

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

**MONITORING AND REPORTING PROGRAM NO. CI-8694
FOR
ITT CANNON INTERNATIONAL, INC.
(HUMBOLDT STREET PROPERTY)**

**ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2002-0030 (Series No. 044)
FILE NO. 03-166**

I. MONITORING AND REPORTING REQUIREMENTS

- A. ITT Cannon International, Inc. (hereinafter Discharger) shall implement this monitoring program on the effective date of this enrollment (February 5, 2004) under Regional Board Order No. R4-2002-0030. The first monitoring report under this program for the monitoring period January to March 2004 shall be received at the Regional Board by April 15, 2004. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule :

<u>Monitoring Period</u>	<u>Report Due</u>
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

- B. Monitoring reports shall include technical information on total quantities of injected chemicals/fluids, composition of injected chemicals/fluids, and injection points/locations. If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.
- C. By March 1 of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall explain the compliance record and the corrective actions taken or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements (WDRs).
- D. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with the WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with the WDRs, as well as all excursions of effluent limitations.

- E. The Discharger shall comply with requirements contained in Section G. of Order No. R4-2002-0030 “*Monitoring and Reporting Requirements*” in addition to the aforementioned requirements.

II. MOLASSES INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

1. Location Map showing the injection points for the molasses, and
2. Written summary defining:
 - Depth of injection points;
 - Quantity of molasses injected per injection point and per vertical spacing at each point; and
 - Total amount of molasses injected.

III. GROUNDWATER MONITORING

The Discharger shall monitor the groundwater conditions to determine the efficacy of the carbohydrate injection and to confirm that the In-situ Reactive Zone (IRZ) is hydraulically contained. Groundwater monitoring data will be collected and reviewed over the duration of the pilot test to determine the need to adjust the strength, frequency, volume and makeup of the reagent solution.

Groundwater monitoring shall be completed in the following wells during the IRZ pilot test events:

- Injection well INJ-1
- Proximal monitoring wells M-1 through M3 and
- Downgradient monitoring wells MW-10S/D, MW-11S/D and MW 12S/D.
- MW-10S/D and MW-11S/D will serve as compliance points.

The locations of the monitoring wells are shown in Figure 1, which is attached.

<u>CONSTITUENT</u>	<u>UNITS*</u>	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u>
Chlorinated Volatile Organic Compounds (EPA Method 8260B)	µg/l	grab	Quarterly
Dissolved Organic Carbon (EPA Method 415.1)	mg/l	grab	Quarterly
Total dissolved solids and Total suspended solids	mg/l	grab	Quarterly
pH	pH units	grab	Quarterly

Oxidation-reduction potential	millivolts	grab	Quarterly
Groundwater Elevation	Feet, bgs	In situ	Quarterly
Total Petroleum Hydrocarbons (TPH) (EPA Method 418.1 and EPA Method 8015M)	µg/l	grab	Quarterly
Benzene, Toluene, Ethylbenzene and Xylene (BTEX)	µg/l	grab	Quarterly
Dissolved Oxygen	mg/l	grab	Quarterly
Chemical Oxygen Demand	µg/l	grab	Quarterly
Major Anions (bromide, chloride, sulfate, nitrate, nitrite, phosphate, carbonate and sulfide)	µg/l	grab	Quarterly
Major Cations (calcium, magnesium, potassium and sodium)	µg/l	grab	Quarterly
Methane, Ethene, Ethane, Carbon Dioxide	µg/l	grab	Quarterly

*µg/l – micrograms per liter
 mg/l – milligrams per liter
 bgs – below ground surface

In the event of additional groundwater monitoring, the Discharger must submit the results of the monitoring according to the reporting schedule specified in section I.A.

All groundwater monitoring reports must include, at minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

IV. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Regional Board Executive Officer (Executive Officer) if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. REMEDIATION PROGRESS REPORT

The Discharger shall submit quarterly remediation progress reports according to the following schedule:

January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

VI. CERTIFICATION STATEMENT

Each report shall contain the following completed declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the ____ day of _____

at _____

_____(Signature)

_____(Title)"

All records and reports submitted in compliance with this Order are public documents and will be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region, upon request by interested parties. Only proprietary information, and only at the request of the Discharger, will be treated as confidential.

Ordered by: _____
Dennis A. Dickerson
Executive Officer

Date: February 5, 2004