

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9596
for
CONOCOPHILLIPS COMPANY
1625 WEST WILLOW STREET, LONG BEACH, CA
(OZONE INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 123)

I. REPORTING REQUIREMENTS

- A. ConocoPhillips Company (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019 (April 30, 2010). The first monitoring report under this program shall be received at the Regional Board by **July 15, 2010**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 15 th
July – December	January 15 th

Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

- B. If there is no discharge or injection during any reporting period, the report shall so state.
- C. By March 1st 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. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.
- E. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.
- F. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually

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analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.

- G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- H. 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 WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.
- I. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- J. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.
- K. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.
- L. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. OZONE INJECTION MONITORING REQUIREMENTS

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

1. Location map showing injection points used for the ozone injection.
2. Written and tabular summary defining the quantity of ozone injected at each injection point per month to the groundwater and a summary describing the days on which the injection system was in operation and depth of injection points.

3. Quarterly visual inspection at each injection point shall be conducted to evaluate the well casing integrity for a period of three month after each injection. The quarterly report shall include a summary of the visual inspection.
4. To avoid groundwater monitoring network reduction, data bias, and well screen clogging or alteration, no groundwater monitoring wells shall be used as injection points during the proposed ozone injection. Separate injection points/wells must be installed at the site for the injection.

III. GROUNDWATER MONITORING PROGRAM

A groundwater-monitoring program shall be designed to detect and evaluate impacts associated with the injection activities. The monitoring program shall include all monitoring wells associated with the site including MW-1 through MW-7. A baseline monitoring and sampling shall be conducted prior to the proposed ozone injections. Baseline monitoring will establish the initial conditions with respect to the contaminant levels. These sampling stations shall not be changed and any proposed change of monitoring locations shall be identified and approved by the Executive Office. The Discharger shall conduct baseline sampling one or two weeks prior to ozone injection and regular sampling with the required frequencies from the up-gradient, down-gradient, and source monitoring wells for the following constituents:

<u>CONSTITUENT</u>	<u>UNITS</u> ¹	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u>
pH ²	PH units	Grab	Semi-Annually
Temperature ²	°F	grab	Semi-Annually
Oxidation-reduction potential ²	Millivolts	grab	Semi-Annually
Specific conductivity ²	µmhos/cm	grab	Semi-Annually
Ferrous iron	µg/L	grab	Semi-Annually
Dissolved Oxygen ²	µg/L	grab	Semi-Annually
MTBE	µg/L	grab	Semi-Annually
Tert-Butyl Alcohol (TBA)	µg/L	grab	Semi-Annually
Di-isopropyl Ether (DIPE)	µg/L	grab	Semi-Annually
Ethyl-t-Butyl Ether (ETBE)	µg/L	grab	Semi-Annually
Tert-Amyl-Methyl Ether (TAME)	µg/L	grab	Semi-Annually
Acetone	µg/L	grab	Semi-Annually
Formaldehyde	µg/L	grab	Semi-Annually
Total Petroleum Hydrocarbons as gasoline (TPHg)	µg/L	grab	Semi-Annually

Carbon tetrachloride	µg/L	grab	Semi-Annually
Benzene	µg/L	grab	Semi-Annually
Ethylbenzene	µg/L	grab	Semi-Annually
Toluene	µg/L	grab	Semi-Annually
Total xylenes	µg/L	grab	Semi-Annually
Methane	µg/L	grab	Semi-Annually
Total organic carbon	µg/L	grab	Semi-Annually
Total dissolved solids	mg/L	grab	Semi-Annually
Sulfate	mg/l	grab	Semi-Annually
Chloride	mg/L	grab	Semi-Annually
Boron	mg/L	grab	Semi-Annually
Carbon dioxide	mg/L	grab	Semi-Annually
Manganese	µg/L	grab	Semi-Annually
Total iron	µg/L	grab	Semi-Annually
Alkalinity	µg/L	grab	Semi-Annually
Chromium (VI) ³	mg/L	grab	Semi-Annually ³
Total Chromium ³	mg/L	grab	Semi-Annually ³

¹ mg/L: milligrams per liter; µg/L: micrograms per liter; µmhos/cm: microohms per centimeter; °F: degree Fahrenheit.

² Field instrument will be used to test for this constituent.

³ The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth semi-annual sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored semi-annually thereafter.

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

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations dropped by the Executive Officer if the Discharger makes a request and the request is backed by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following 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 _____.

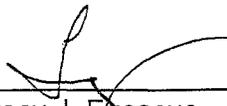
(Signature)

(Title)

VI. PUBLIC DOCUMENTS

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:



Tracy J. Egoscue
Executive Officer

Date: May 3, 2010

