
Los Angeles Regional Water Quality Control Board

October 10, 2012

Mr. Michael Dever
Ashland Inc.
5200 Blazer Parkway, DS-4
Dublin, Ohio 43017

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9809 – FORMER ASHLAND FACILITY, 13161 SANDOVAL STREET, SANTA FE SPRINGS, CALIFORNIA (FILE NO. 11-191, ORDER NO. R4-2007-0019, SERIES NO. 186, CI-9809, GLOBAL ID. WDR100001865)

Dear Mr. Dever:

On April 23, 2011, Los Angeles Regional Water Quality Control Board (Regional Board) enrolled you into general Waste Discharge Requirements (WDR Order No. R4-2007-0019) and issued a Monitoring and Reporting Program (MRP) No. CI-9809 for re-injection of treated groundwater into the shallow aquifer as part of an existing groundwater remediation program at the subject site.

On behalf of Ashland Inc., EHS Support Inc. prepared and submitted the *Proposed Monitoring Amendments* (Amendment) dated August 28, 2012 and the *Monitoring Addendum* (Addendum) dated September 19, 2012 to request a modification to the MRP No. CI-9809. Because treated groundwater that exhibits general mineral contents (total dissolved solids, sulfate, and chloride), which may be naturally occurring and not the result of pollution, in concentrations exceeding water quality objectives of groundwater specified in the Basin Plan, the Amendment and Addendum propose to collect a boarder range of groundwater samples from three additional wells (EX-2, EX-4, and EX-6) that will demonstrate more representative background conditions throughout the site.

Based on review of the information submitted, the Regional Board approves the proposed modifications to the MRP No. 9809. The revised MRP, which incorporates the proposed modification, is enclosed. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001865. ESI training video is available at: <https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

For all parties who upload electronic documents to State Database GeoTracker, it is no longer necessary to email a copy of these documents to losangeles@waterboards.ca.gov or submit hard copies to our office. The Regional Board will no longer accept documents (submitted by either hard copy or email) already uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker User dated December 12, 2011 at: <http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20OGT%20Users.pdf>

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general WDR in a separate letter when the project is completed and the WDR is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

If you have any questions, please contact the Project Manager, Dr. Ann Chang at (213) 620-6122 (achang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (ewu@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9809 dated October 1, 2012

cc: Ms. Kristan Avedikian, EHS Support, Inc.

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9809
FOR
FORMER ASHLAND FACILITY
13161 SANDOVAL STREET, SANTA FE SPRINGS, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2007-0019 (SERIES NO. 186)
FILE NO. 11-191

I. MONITORING AND REPORTING REQUIREMENTS

- A. Ashland Inc. (hereinafter Discharger) shall implement this revised Monitoring and Reporting Program (MRP) on the effective date (October 10, 2012) under Regional Board Order No. R4-2007-0019. The next monitoring report under this program, shall be received at the Regional Board by **January 15, 2013**. 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. If there is no discharge or injection, during any reporting period, the report shall so state. 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 discuss 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.
- C. The Discharger shall comply with requirements contained in Section G of Order No. R4-2007-0019 "*Monitoring and Reporting Requirements*" in addition to the aforementioned requirements.

II. DISCHARGE MONITORING PROGRAM

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

1. Location map showing the discharge point used for re-injection of treated groundwater.
2. Written and tabular summary defining depth of the discharge point and quantity of treated groundwater re-injected to the aquifer per day and a summary describing the days on which the system is in operations.
3. The Discharger shall conduct monthly monitoring program on the treated groundwater before re-injecting it to the aquifer. Treated groundwater samples shall be collected from the effluent tank for the following chemical analyses:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Dissolved Solids	mg/L	grab	Monthly
Sulfate	mg/L	grab	Monthly
Chloride	mg/L	grab	Monthly
Boron	mg/L	grab	Monthly
Volatile Organic Compounds	µg/L	grab	Monthly
1,4-Dioxane	µg/L	grab	Monthly

III. GROUNDWATER MONITORING PROGRAM

A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from wells MW-1R, MW-25, EX-1, EX-2, EX-4, and EX-6 (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by monthly for the first six months and quarterly sampling events after the injection from all 6 wells for the following groundwater parameters:

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CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Oxidation-Reduction Potential	millivolts	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
pH	pH units	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Specific Conductivity	mS/cm	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Temperature	°C	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Turbidity	NTU	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Total Organic Carbon	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Total Dissolved Solids	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Sulfate	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Chloride	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Boron	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Nitrate and Nitrite	mg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter
Volatile Organic Compounds	µg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
1,4-Dioxane	µg/L	grab	Baseline, monthly for the first six months after injection, and quarterly thereafter Same as specified above

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 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)"

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VI. PUBLIC DOCUMENTS

All records and reports submitted in compliance with Order No.R4-2007-0019 and Monitoring and Reporting Program No. CI-9809 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.

VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data in Electronic Deliverable Format, discharge location data, and searchable Portable Document Format of monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001865.

Ordered by: 
Samuel Unger, P.E.
Executive Officer

Date: October 10, 2012

