



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

September 16, 2013

Mr. Robert Brager, Public Works Director
City of Malibu
23825 Stuart Ranch Road
Malibu, CA 90265-4861

REVISION OF MONITORING AND REPORTING PROGRAM FOR CITY OF MALIBU – AQUIFER STORAGE AND RECOVERY (AST) PROJECT (FILE NO. 13-068, ORDER NO. 2012-0010-DWQ, CI-9949, GEOTRACKER GLOBAL ID NO. 100011894)

Dear Mr. Brager:

On June 20, 2013, the California Regional Water Quality Control Board, Los Angeles Region, (Regional Board) enrolled you under general Waste Discharge Requirements for Aquifer Storage and Recovery (AST) projects that inject drinking water into groundwater (WDR Order No. 2012-0010-DWQ, adopted September 19, 2012) for injection of potable water into Malibu Groundwater Basin at Malibu Civic Center area.

On August 23, 2013, RMC Water and Environment, on behalf of the City of Malibu (City) submitted a request for (1) elimination of the sampling of the potable water hydrant for injection at well MCWP-MW02; and (2) reduction of the number and types of analyses at monitoring wells before and after injection.

Based on data provided in your August 20, 2013 email, potable water used for injection at MCWP-MW03 and MCWP-MW01 has met all drinking water standards, therefore it is unnecessary to analyze the same potable water for Injection at MCWP-MW02. The analytical results collected at monitoring wells during previous injections indicated that there were no detections of radioactivity, organic chemicals, disinfection byproducts, and any other constituents of concerns exceeding maximum contaminant levels except chromium. Groundwater samples collected from shallow well MCWP-MW07s showed chromium at concentrations of 200 micrograms per liter ($\mu\text{g}/\text{l}$) before injection and 62 $\mu\text{g}/\text{l}$ after injection.

After reviewing the data, Regional Board staff agree that the sampling requirements for potable water for future injection can cease. The City of Malibu shall continue to collect groundwater samples from monitoring wells MCWP-MW06 and LY-MW04, and analyze for metals and nutrients for the injection at MCWP-MW02. Because the City uses potable water for injection and the groundwater impact resulting from the use of potable water is minimal, the requirements of other analysis including radioactivity, organic chemicals and disinfection byproducts are therefore removed.

The revised monitoring and reporting program (MRP) is enclosed. The next monitoring report is due on **October 15, 2013** as required in the revised MRP.

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

Mr. Robert Brager
Public Works Director
City of Malibu

September 16, 2013

The City 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 format monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100011894. ESI training video is available at:

<https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

To avoid paying future annual fees, please submit a written request for termination of our 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 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 concerning this letter, please contact Dr. Don Tsai at (213) 620-2264 (dtsai@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

Enclosures: Revised Monitoring and Reporting Program CI No. 9949

cc (via email): Mr. Patrick Nejadian, County of Los Angeles Department of Public Health
Ms. Leslie Dumas, RMC Water and Environment

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

320 West 4th Street, Suite 200, Los Angeles, California 90013
(213) 576-6660 • Fax (213) 576-6640
<http://www.waterboards.ca.gov/losangeles/>

**MONITORING AND REPORTING PROGRAM NO. CI-9949
FOR
CITY OF MALIBU
AQUIFER STORAGE AND RECOVERY PILOT INJECTION TESTING PROJECT
ENROLLMENT UNDER GENERAL WASTE DISCHARGE REQUIREMENTS
FOR
AQUIFER STORAGE AND RECOVERY PROJECTS THAT INJECT DRINKING WATER INTO
GROUNDWATER
ORDER NO. 2012-0010-DWQ
(FILE NO. 13-068)**

I. REPORTING REQUIREMENTS

- A. The effective date of this Monitoring and Reporting Program (MRP) No. CI-9949 is June 20, 2013. The City of Malibu (hereafter City or Discharger) shall implement this MRP immediately for the Aquifer Storage and Recovery (ASR) Pilot Injection Testing Project. The first monitoring report is due July 15, 2013.

Monitoring reports shall to be received by the dates, specified in Table 1:

Table 1. Reporting Period and Due Dates

Reporting Period	Report Due
January ~ March	April 15
April ~ June	July 15
July ~ September	October 15
October ~ December	January 15

- B. If there is no injection during reporting periods, the report shall so state.
- C. The City shall submit a final summary report to the Regional Water Quality Control Board (Regional Board) after the testing project completed. The final report shall contain both tabular and graphical summaries of the monitoring data obtained during the pilot injection testing period. In addition, the City shall explain the compliance record and the corrective actions taken or planned, which may be needed to bring the injection into full compliance with the Waste Discharge Requirements (WDRs).
- D. Laboratory analyses – all chemical and bacteriological analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health Environmental Laboratory Accreditation Program (ELAP). The laboratory must meet the United States Environmental Protection Agency (USEPA) Quality

- Assurance/Quality Control (QA/QC) criteria. Pollutants shall be analyzed using the methods described in 40 CFR 136.3, 136.4, and 136.5; or where no methods are specified for a given pollutant, methods approved by the Regional Board shall be utilized.
- E. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the City 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 City shall submit a list of the analytical methods employed for each test and the associated laboratory QA/QC procedures upon the request of the Regional Board.
 - F. All QA/QC samples must be run on the same dates when samples were actually analyzed. The City shall make available for inspection and/or submit the QA/QC documentation upon request by Regional board staff.
- Proper chain of custody procedures must be followed and a copy of the chain of custody documentation shall be submitted with the report.
- 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 Public Health and in accordance with current USEPA guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the chain of custody shall be submitted with the report.
 - H. For every item where the requirements are not met, the City shall submit a statement of the cause(s), and actions undertaken or proposed which will bring the discharge into full compliance with WDRs at the earliest possible time, including a timetable for implementation of those actions.
 - I. The City shall maintain all sampling and analytical results, including strip charts; 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. In reporting the monitoring data, the City 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.
 - K. Any mitigation/remedial activity including any pre-discharge treatment conducted at the site must be reported in the final report.
 - L. The final monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses any items where the injection limitations were not met, per numerical limitations of the Maximum Contaminant Levels. The City shall include a statement about the cause(s) of non-compliance and the corrective actions taken or planned that may be needed to bring the injection into full compliance with

WDRs. This section shall be located at the front of the report and shall clearly list all items non-compliant with the WDR, as well as any excursion of effluent and receiving water limitations.

II. MONITORING REQUIREMENTS

The monitoring report shall contain the following information for each injection:

- A. Average, minimum, maximum, and total daily injection flow in gallons per day at each location;
- B. Results of at least daily observations in the injection area for any overflow during injection; and,
- C. The groundwater elevation shall be measured at 16 wells listed in Table 2, at a minimum, once before injection, daily during injection, and weekly for the next 3 consecutive weeks after injection is completed.

Table 2. Locations of Groundwater Elevation Monitoring

Groundwater Elevation Monitoring Well	Latitude	Longitude
For Injection Well MCWP-MW01		
M7-1	34° 2' 11.8" N	118° 41' 25.1" W
M6-1	34° 2' 9.6" N	118° 41' 29.4" W
MBCMW-7	34° 2' 8.2" N	118° 41' 26.5" W
MBCMW-8	34° 2' 8.2" N	118° 41' 26.5" W
MCWP-MW04s	34° 2' 7.1" N	118° 41' 28.1" W
MCWP-MW04d	34° 2' 7.0" N	118° 41' 27.9" W
For Injection Well MCWP-MW02		
MCWP-MW06	34° 2' 4.7" N	118° 41' 11.5" W
LY-MW01	34° 2' 4.6" N	118° 41' 16.1" W
LY-MW02	34° 2' 7.1" N	118° 41' 16.1" W
LY-MW03	34° 2' 7.1" N	118° 41' 16.1" W
LY-MW04	34° 2' 4.6" N	118° 41' 11.4" W
LY-MW05	34° 2' 5.3" N	118° 41' 13.2" W
For Injection Well MCWP-MW03		
TY-MW5	34° 2' 0.6" N	118° 41' 48.1" W
SMBRP-11	34° 1' 59.2" N	118° 41' 46.0" W
MCWP-MW07s	34° 2' 0.7" N	118° 41' 41.0" W
MCWP-MW07d	34° 2' 0.7" N	118° 41' 40.7" W

- D. Potable water quality samples shall be conducted once prior to being injected into MCWP-MW01 and MCWP-MW03.
- E. Groundwater samples shall be collected at MCWP-MW04s and MCWP-MW04d for injection at MCWP-MW01, and at MCWP-MW07s and MCWP-MW07d for injection at MCWP-MW03 once before injection and once after the injection is completed for the parameters and frequency specified in Table 3.

Table 3. Potable Water and Groundwater Quality Monitoring

Constituent	Units	Type of Sample	Frequency
pH	pH unit	Grab	Once before injection and once after injection completed
Attachment A-1	varies		
Attachment A-2	pCi/L		
Attachment A-3	mg/L		
Attachment A-4	µg/L		
Attachment A-5	varies		

- F. Groundwater samples shall be collected from MCWP-MW06 and LY-MW04 once before injection and once after injection at MCWP-MW02, and shall be analyzed for pH, nutrients including nitrate and nitrite, and metals as specified in Attachment A-1 and A-5.
- E. In addition, the City shall submit an operation and maintenance report on the injection as well as groundwater monitoring wells. The information to be contained in the report shall include, at a minimum, the following:
 1. The name and address of the person or company responsible for the operation and maintenance of the wells;
 2. Maintenance records of all wells; and,
 3. Frequency of maintenance, if preventive.

III. ELECTRONIC SUBMITTAL OF INFORMATION

The City shall comply with the Electronic submittal of Information (ESI) requirements by submitting all reports required under the MRP, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100011894.

IV. 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)"

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

Date: September 16, 2013