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

MONITORING AND REPORTING PROGRAM NO. CI-9714

FOR

FORMER YELLOW FREIGHT TERMINAL
2350 DOMINGUEZ STREET, CARSON

(HYDROGEN RELEASE COMPOUND INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 163)

I. REPORTING REQUIREMENTS

1. YRC Enterprise Services, Inc. (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) effective on June 22, 2011. The first monitoring report under this program, for July - December 2011, shall be received at the Regional Board by February 15, 2012. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due
January – June	August 15
July – December	February 15

   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.

2. The Discharger shall include an annual summary to the second half semi-annual monitoring report which is due by February 15 each year. The summary 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).

3. 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.

4. 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.

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

6. 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 MRP." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.

7. 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.

8. 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.

9. 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.

10. 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.

11. The Discharger should not implement any changes to the MRP prior to receiving Executive Officer's written approval.

12. The Discharger shall submit all reports required under this MRP, including groundwater monitoring data, to the State Water Resources Control Board GeoTracker database, in

addition to submitting hard copies to the Regional Board office. Once the Discharger demonstrates mastery of electronic submittal of reports to GeoTracker for the Site, it may request that the Regional Board waive the requirement of submitting hard copies of reports.

II. HYDROGEN RELEASE COMPOUND INJECTION MONITORING REQUIREMENTS

The Semi-Annual reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the hydrogen release compound.

2. Written and tabular summary defining the quantity of hydrogen release compound injected per month to the groundwater and a summary describing the days on which the injection system has been operating.

3. Monthly visual inspection at each injection well shall be conducted to evaluate the well casing integrity for a period of three months after each injection. The semi-annual report shall include a summary of the visual inspection.

4. Once the pilot test has been performed, a report documenting the results of the pilot test shall be submitted to the Regional Board including evaluation of the proposed injection specified in the December 15, 2009, *Remedial Action Plan Enhanced In-Situ Bioremediation* and August 11, 2010, *Remedial Action Plan Addendum, Response to Comments by Regional Water Quality Control Board* for approval by the Executive Officer. You must obtain approval of this report by the Executive Officer prior to any subsequent hydrogen release compound injection after completion the pilot test.

III. GROUNDWATER MONITORING PROGRAM

1. During the pilot test period, the Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from three downgradient monitoring wells (MW-106, MW-107 and MW-108) on a quarterly basis to monitor the effectiveness of the in-situ groundwater remediation for a period of six months in accordance with the discharge monitoring program specified in Provision III.2 except the semi-annual groundwater monitoring frequency.

2. The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from seven cross/down-gradient monitoring wells (MW-101, MW-102, MW-103, MW-104, MW-106, MW-107, and MW-108), and one up-gradient monitoring well (MW-105) on a semi-annual basis to monitor the effectiveness of the in-situ groundwater remediation. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
All chemical compounds listed in the US EPA Test Method 8260B	µg/L	Grab	• Semi-Annually[1]
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually[1]
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually[1]
Oxidation-reduction potential	milivolts		• Semi-Annually[1]
Dissolved Oxygen	µg/L	Grab	• Semi-Annually[1]
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually[1]
Total Chromium and chromium six [2]	µg/L	Grab	• Semi-Annually[1]
pH	pH units	Grab	• Semi-Annually[1]
Temperature	$^0F/^0C$	Grab	• Semi-Annually[1]
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually[1]

[1] One week before injection, one month after injection for first three months and Semi-Annually thereafter.

[2] The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth Semi-Annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored Semi-Annually thereafter.

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

   a. Well identification, date and time of sampling;
   b. Sampler identification, and laboratory identification;
   c. Semi-Annually 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 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. 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: Samuel Unger

Samuel Unger, PE
Executive Officer

Date: June 22, 2011