CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING ORDER NO. R5-2015-0810
CALIFORNIA WATER CODE SECTION 13267

FOR
GLENN SPRINGS HOLDING, Inc.
FORMER OCCIDENTAL CHEMICAL CORPORATION
LATHROP FACILITY, SAN JOAQUIN COUNTY

This Order is issued to Glenn Springs Holding, Inc. (GSH), former Occidental Chemical Corporation (hereafter Discharger) pursuant to California Water Code section 13267, which authorizes the Executive Officer of the California Regional Water Quality Control Board, Central Valley Region (hereafter Central Valley Water Board) to issue a Monitoring and Reporting (MRP) Order (Order).

The Executive Officer finds:

INTRODUCTION

1. The former Occidental Chemical Corporation (OCC) facility (Site) is located at 16777 South Howland on 341 acres of land, in the town of Lathrop, San Joaquin County, Section 35, Township1S, Range 6E (Figure 1).

2. The Best Fertilizers Company (Best) developed the Site initially and began manufacturing fertilizers at this location in 1952 OCC acquired Best in 1963 and transferred its assets including the Site to OCC Oxychem Division. OCC operated the Site as a pesticide and fertilizer manufacturing facility from 1953 until the end of 1982. In 1983 the Site and certain assets were conveyed to the J.R. Simplot Company (Simplot). Simplot continues to manufacture fertilizers at the Site and OCC retains responsibility for implementing environmental remediation of groundwater at the Site pursuant to the 1982 Stipulation and Judgment Approving Settlement (No. CIV S-79-989 MLS) with the United States and the State of California. Glenn Springs Holdings, Inc. now manages the groundwater cleanup on behalf of OCC.

3. At the Site, soil and groundwater have been impacted with various chemicals, identified below, due to past industrial activities and waste disposal practices. This pollution has impaired the beneficial use of the underlying aquifers.

4. Site investigation and cleanup activities have been ongoing since the early 1980s. Source removal (soil excavations) has been completed at some areas of the Site. Groundwater remediation (extraction and treatment) system operation commenced in 1982 and is ongoing. The groundwater treatment system is permitted to process up to 750 gallons per minute (gpm) and typically processes approximately 350 to 500 gpm. Groundwater is currently being extracted from eighteen (18) wells and treated using granular activated carbon (GAC).

5. The treated water is primarily reinjected into a deeper aquifer through two (2) injection wells under the Waste Discharge Requirements (WDRs) No. R5-2012-0106 issued by the Central Valley Water Board on 4 October 2012. The majority of treated water is discharged into a confined aquifer beneath a thick confining layer of blue clay, the Concoran Clay, approximately 230 to 300 feet below ground surface (bgs). The remaining treated water is injected into the upper aquifer. The confined aquifer is isolated from useable groundwaters. Flow distribution of the treated groundwater is not controlled by any means other than the natural receptivity of the injection wells and hydrogeologic characteristics of the confined aquifer. The injection system operation must comply with the WDRs issued for the Site.

6. The unconfined aquifer system below the Site is generally classified as a four-production zone system: water table zone (approximately 15 to 50 feet below bgs), shallow zone (approximately 50 to 100 feet bgs), intermediate zone (approximately 100 to 150 ft bgs), and deep zone (approximately 151 feet and 218 ft bgs). A fifth hydrogeologic unit at the Site is the confined injection zone, which is located below the Corcoran Clay layer, at a depth greater than approximately 300 feet bgs.

7. The groundwater monitoring network includes one ninety seven (97) monitoring wells, one multi-level monitoring well with seven (7) sampling ports, eighteen (18) extraction wells, four (4) injection wells, and six (6) municipal supply wells.

8. Existing data and information about the site show the presence of pesticides and fumigants, including 1,2-dibromo-3-chloropropane (DBCP), ethylene dibromide (EDB) and sulfolane resulting from the Discharger's past operations. Groundwater beneath the Site is also contaminated with chloride, nitrate, and sulfate.

9. This Order replaces the requirements listed in MRP No. R5-2004-0800.

10. Prior to construction of any new groundwater monitoring or extraction wells, and prior to abandonment of any groundwater monitoring or extraction wells, the Discharger shall submit plans and specifications to the Central Valley Water Board for review and approval. All well installation and abandonment permits shall be obtained from San Joaquin County Environmental Health Department. Once installed, all new wells shall be added to the monitoring program and shall be sampled and analyzed quarterly per Table 1 and Table 2. The sampling frequency for these new wells may be re-evaluated after one year.

LEGAL PROVISIONS

1. CWC section 13267 states, in part:

> (b)(1) In conducting an investigation, the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region . . . shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

The reports required herein are necessary for the reasons described in this Order, to assure protection of waters of the state, and to protect public health and the environment.

2. CWC section 13268 states, in part:

> (a)(1) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267 . . . or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).
>
> (b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with Section 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars ($1,000) for each day in which the violation occurs.

Failure to submit the required reports to the Central Valley Water Board according to the schedule detailed herein may result in enforcement action(s) being taken against you, which may include the imposition of administrative civil liability pursuant to CWC section 13268. Administrative civil liability of up to $1,000 per violation per day may be imposed for non-compliance with the directives contained herein.

REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to California Water Code section 13267, Occidental Chemical Company shall:

1. Conduct monitoring and reporting in compliance with the following specifications.

2. As shown on Table 1 and on Figure 2, there are 97 monitoring wells, 1 multi-level monitoring well with 7 ports, 18 extraction wells, 6 municipal supply wells, and 4

injection wells currently included in the Site monitoring program. Groundwater samples shall be collected and analyzed semi-annually or annually for all existing wells (with the exception of the wells noted in Table 1), and all new wells shall be sampled quarterly for a minimum of four quarters. The sampling frequency for these new wells may be re-evaluated after four quarters. Table 1 lists the wells and sampling frequency. Table 2 shows the constituents of concern and the analytical methods and reporting limits for the constituents of concern.

3. Field parameters shall be measured and recorded for each monitoring point as shown in the table below.

FIELD PARAMETERS

Parameter	Units
Depth to Groundwater	±0.01 ft
Electrical Conductivity	50 µS/cm^2
pH	0.01 units
Temperature	0.1 $^{\circ}$ Celsius
Turbidity	± 1 NTU
Purge Rate	GPM
Total Gallons Purged	Gallons
Water Level	Ft MSL

ft = foot or feet
µS/cm^2 = micro siemens per centimeter squared
GPM = gallons per minute
NTU = nephelometric turbidity unit
Ft MSL = feet below mean sea level

4. Sample collection and analysis shall follow standard EPA protocol. If necessary, equivalent analytical methods may be used with Central Valley Water Board staff concurrence.

REPORTING

5. When reporting the data, the Discharger shall arrange the information in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized in such a manner as to illustrate clearly the compliance with this Order.

6. As required by the California Business and Professions Code sections 6735, 7835, and 7835.1, all reports shall be prepared by a registered professional or their subordinate and signed by the registered professional.

7. Semi-annual electronic reports, which conform to the requirements of the California Code of Regulations, title 23, division 3, chapter 30, shall be submitted electronically over the internet to the State Water Board Geotracker database system by **the 1st day of the second month following the end of each semi-annual period (i.e., by 1 February and 1 August**), until such time as the Executive Officer determines that the reports are no longer necessary. Each semi-annual report shall include the following minimum information:

   (a) A description and discussion of the groundwater sampling event and results, including trends in the concentrations of pollutants and groundwater elevations in the wells, how and when samples were collected, and whether the pollutant plume is delineated.

   (b) Field logs that contain, at a minimum, water quality parameters measured before, during, and after purging, method of purging, depth of water, volume of water purged, etc.

   (c) Groundwater contour maps for all groundwater zones, if applicable.

   (d) Isocontour pollutant concentration maps for all groundwater zones and all major constituents of concern, if applicable.

   (e) A table showing well construction details such as well number, groundwater zone being monitored, coordinates (longitude and latitude), ground surface elevation, reference elevation, elevation of screen, elevation of bentonite, elevation of filter pack, and elevation of well bottom.

   (f) A table showing historical lateral and vertical (if applicable) flow directions and gradients.

(g) Raw laboratory data shall be provided in electronic files within the report. The Central Valley Water Board may request additional data as necessary.

(h) A copy of the laboratory analytical data report.

(i) If applicable, the status of any ongoing remediation, including cumulative information on the mass of pollutant removed from the subsurface, system operating time, the effectiveness of the remediation system, and any field notes pertaining to the operation and maintenance of the system.

(j) If applicable, the reasons for and duration of all interruptions in the operation of any remediation system, and actions planned or taken to correct and prevent interruptions.

8. An Annual Report shall be submitted to the Central Valley Water Board by **1 February** of each year. This report shall contain an evaluation of the effectiveness and progress of the investigation and remediation, and may be substituted for the second semi-annual monitoring report, provided that all information that must be submitted in the semi-annual report is included along with the following minimum information:

(a) Both tabular and graphical summaries of all data obtained during the year.

(b) Cumulative data tables Excel files for all major constituents of concern containing the water quality analytical results and depth to groundwater for all monitoring wells for the past five years, if applicable.

(c) Groundwater contour maps and pollutant concentration maps containing all data obtained during the previous year.

(d) A discussion of the long-term trends in the concentrations of the pollutants in the groundwater monitoring wells.

(e) If active removal system is in place, an analysis of whether the pollutant plume is being captured by an extraction system or is continuing to spread.

(f) A description of all remedial activities conducted during the year, an analysis of their effectiveness in removing the pollutants, and plans to improve remediation system effectiveness.

(g) An identification of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.

(h) If applicable, a proposal and rationale for any revisions to the groundwater sampling plan frequency and/or list of analytes.

9. The results of any monitoring done more frequently than required at the locations specified in this Order also shall be reported to the Central Valley Water Board.

The Discharger shall implement the above monitoring program as of the effective date of the Order. This Order is effective upon the date of signature.

Ordered by:

for PAMELA C. CREEDON, Executive Officer

6/29/2015
(Date)

MONITORING AND REPORTING PROGRAM NO. R5-2015-0810
FORMER OCCIDENTAL CHEMICAL CORPORATION FACILITY, LATHROP
SAN JOAQUIN COUNTY

Table 1
Sampling Locations, Analytes, and Sampling Frequency[1,2,3]

Sampling Location	EDB	DBCP	Sulfolane	OC & OP Pesticides	Total Volume Injected, Rate Injected, Injection Pressure	BHC Isomers	Herbicides	Total Dissolved Solids	Nitrate, Chloride, Sulfate
EXTRACTION WELLS									
EW-1	A	A	A	--	--	--	--	--	--
EW-2	A	A	A	--	--	--	--	--	--
EW-4	A[4]	A[4]	A[4]	--	--	--	--	--	--
EW-4A	A	A	A	--	--	--	--	--	--
EW-5	A	A	A	--	--	--	--	--	--
EW-6	A	A	A	--	--	--	--	--	--
EW-7	A	A	A	--	--	--	--	--	--
EW-08A	S	S	S	--	--	--	--	--	--
EW-08B	S	S	S	--	--	--	--	--	--
EW-9	S	S	S	--	--	--	--	--	--
EW-10	S	S	S	--	--	--	--	--	--
EW-11	S	S	S	--	--	--	--	--	--
EW-12A	S	S	S	--	--	--	--	--	--
EW-12B	S	S	S	--	--	--	--	--	--
EW-13	S	S	S	--	--	--	--	--	--
EW-14A	S	S	S	--	--	--	--	--	--
EW-14B	S	S	S	--	--	--	--	--	--
EW-15A	S	S	S	--	--	--	--	--	--
EW-15B	S	S	S	--	--	--	--	--	--
EW-17	S	S	S	--	--	--	--	--	--
New Well (s)	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
INJECTION WELLS *									
IW-1	M[9]	M[9]	M[9]	M[9]	Continuous	--	--	--	--
IW-2	M[9]	M[9]	M[9]	--	Continuous	--	--	M[9]	Q
INJ-13	M[9]	M[9]	M[9]	--	Continuous	--	--	M[9]	Q
INJ-14	M[9]	M[9]	M[9]	--	Continuous	--	--	M[9]	Q
GROUNDWATER MONITORING WELLS									
Water Table Zone									
PW01-048	S	S	S	--	--	A	--	A	A
PW02-040	S	S	S	--	--	A	--	A	A
PW03-049	A	A	A	--	--	A	--	A	A
PW07-038	A	A	A	--	--	A	--	A	A
PW11-031	S	S	S	--	--	A	--	A	A
PW13-046	S	S	S	--	--	A	--	A	A
PW23-045	S	S	S	--	--	A	--	A	A
PW27-040	--	--	--	--	--	--	--	--	--
PW28-040	S	S	S	--	--	A	--	A	A
PW29-040	--	--	--	--	--	--	--	--	--
PW30-030	S	S	S	--	--	A	--	A	A
PW31-030	S	S	S	--	--	A	--	A	A
New Well(s)	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[6,7]	Q[6,7]

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Sampling Location	EDB	DBCP	Sulfolane	OC & OP Pesticides	Total Volume Injected, Rate Injected, Injection Pressure	BHC Isomers	Herbicides	Total Dissolved Solids	Nitrate, Chloride, Sulfate
Shallow Zone									
PW02-080A	S	S	S	--	--	A	--	A	A
PW04-058A	S	S	S	--	--	A	--	A	A
PW05-063	S	S	S	--	--	A	--	A	A
PW06-080	A	A	A	--	--	A	--	A	A
PW08-076	A	A	A	--	--	A	--	A	A
PW09-080	A	A	A	--	--	A	--	A	A
PW10-084	A	A	A	--	--	A	--	A	A
PW12-078	A	A	A	--	--	A	--	A	A
PW13-090	S	S	S	--	--	A	--	A	A
PW16-083	S	S	S	--	--	A	--	A	A
PW19-092	A	A	A	--	--	A	--	A	A
PW21-087	S	S	S	--	--	A	--	A	A
PW22-071	A	A	A	--	--	A	--	A	A
PW24-051	S	S	S	--	--	A	--	A	A
PW26-086	S	S	A	--	--	A	--	A	A
PW30-080	S	S	S	--	--	A	--	A	A
PW31-080	S	S	S	--	--	A	--	A	A
PW33-085	S	S	S	--	--	A	--	A	A
WS-1-1	A	A	A	--	--	A	--	A	A
WS-1-2	A	A	A	--	--	A	--	A	A
New Well(s)	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
Intermediate Zone									
PW01-129	S	S	S	--	--	A	--	A	A
PW02-155	S	S	S	--	--	A	--	A	A
PW03-142	A	A	A	--	--	A	--	A	A
PW04-113	S	S	S	--	--	A	--	A	A
PW05-125	S	S	S	--	--	A	--	A	A
PW06-149	A	A	A	--	--	A	--	A	A
PW07-101	A	A	A	--	--	A	--	A	A
PW09-123	A	A	A	--	--	A	--	A	A
PW10-147	A	A	A	--	--	A	--	A	A
PW11-108	S	S	S	--	--	A	--	A	A
PW12-139	A	A	A	--	--	A	--	A	A
PW16-146	S	S	S	--	--	A	--	A	A
PW19-149	A	A	A	--	--	A	--	A	A
PW21-155	S	S	S	--	--	A	--	A	A
PW23-110	S	S	S	--	--	A	--	A	A
PW24-146	S	S	S	--	--	A	--	A	A
PW25-120	S	S	S	--	--	A	--	A	A
PW26-154	S	S	S		--	A	--	A	A
PW30-130	S	S	S	--	--	A	--	A	A
PW31-130	S	S	S	--	--	A	--	A	A
PW32-130	S	S	S	--	--	A	--	A	A
PW33-125	S	S	S	--	--	A	--	A	A
PW34-160	S	S	S	--	--	A	--	A	A
PW35-140	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
WS-1-3	A	A	A	--	--	A	--	A	A
WS-1-4	A	A	A	--	--	A	--	A	A
New Wells	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]

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FORMER OCCIDENTAL CHEMICAL CORPORATION FACILITY, LATHROP
SAN JOAQUIN COUNTY

Table 1
Sampling Locations, Analytes, and Sampling Frequency[1,2,3]

Sampling Location	EDB	DBCP	Sulfolane	OC & OP Pesticides	Total Volume Injected, Rate Injected, Injection Pressure	BHC Isomers	Herbicides	Total Dissolved Solids	Nitrate, Chloride, Sulfate
DEEP/INJECTION ZONE									
Deep Zone Wells									
PW01-180	S	S	S	--	--	A	--	A	A
PW01-236	S	S	S	--	--	A	--	A	A
PW03-218	A	A	A	--	--	A	--	A	A
PW04-199	S	S	S	--	--	A	--	A	A
PW05-196	S	S	S	--	--	A	--	A	A
PW06-197	A	A	A	--	--	A	--	A	A
PW07-203	A	A	A	--	--	A	--	A	A
PW08-155	A	A	A	--	--	A	--	A	A
PW08-180	A	A	A	--	--	A	--	A	A
PW09-198	A	A	A	--	--	A	--	A	A
PW10-195	A	A	A	--	--	A	--	A	A
PW11-195	S	S	S	--	--	A	--	A	A
PW12-193	A	A	A	--	--	A	--	A	A
PW13-165	S	S	S	--	--	A	--	A	A
PW16-216	S	S	S	--	--	A	--	A	A
PW18-199	A	A	A	--	--	A	--	A	A
PW19-196	A	A	A	--	--	A	--	A	A
PW21-190	S	S	S	--	--	A	--	A	A
PW21-270	S	S	S	--	--	A	--	A	A
PW22-164	A	A	A	--	--	A	--	A	A
PW22-196	A	A	A	--	--	A	--	A	A
PW23-185	S	S	S	--	--	A	--	A	A
PW24-201	S	S	S	--	--	A	--	A	A
PW25-170	S	S	S	--	--	A	--	A	A
PW25-208	S	S	S	--	--	A	--	A	A
PW25-250	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
PW26-199	S	S	S	--	--	A	--	A	A
PW30-180	S	S	S	--	--	A	--	A	A
PW30-240	S	S	S	--	--	A	--	A	A
PW31-180	S	S	S	--	--	A	--	A	A
PW32-180	S	S	S	--	--	A	--	A	A
PW33-175	S	S	S	--	--	A	--	A	A
PW33-207	S	S	S	--	--	A	--	A	A
PW34-200	S	S	S	--	--	A	--	A	A
PW34-250	S	S	S	--	--	A	--	A	A
PW35-200	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
PW35-250	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
PW36-170	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
PW36-250	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
WS-1-5	A	A	A	--	--	A	--	A	A
WS-1-6	A	A	A	--	--	A	--	A	A
WS-1-7	A	A	A	--	--	A	--	A	A
Injection Zone Wells									
PW09-338	A	A	A	--	--	A	--	A	A
PW12-315	A	A	A	--	--	A	--	A	A
PW16-329**	A	A	A	--	--	A	--	A	A
PW20-500**	A	A	A	--	--	A	--	A	A
New Well(s)	Q[5]	Q[5]	Q[5]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]
CITY OF LATHROP WELLS									
LWD-6	S	S	S	S	--	S	S	A	A
LWD-7	S	S	S	S	--	S	S	A	A
LWD-8	S	S	S	S	--	S	S	A	A
LWD-9	S	S	S	S	--	S	S	A	A
LWD-10	S	S	S	S	--	S	S	A	A
LWD-21	S	S	S	S	--	S	S	A	A
New Well (s)	Q[5]	Q[5]	Q[6,7]	Q[6,7]	--	Q[6,7]	Q[6,7]	Q[8]	Q[8]

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FORMER OCCIDENTAL CHEMICAL CORPORATION FACILITY, LATHROP
SAN JOAQUIN COUNTY

Table 1
Sampling Locations, Analytes, and Sampling Frequency[1,2,3]

Sampling Location	EDB	DBCP	Sulfolane	OC & OP Pesticides	Total Volume Injected, Rate Injected, Injection Pressure	BHC Isomers	Herbicides	Total Dissolved Solids	Nitrate, Chloride, Sulfate

[1] All wells shall be monitored semi-annually for water levels.

[2] Wells that are sampled semi-annually shall be sampled during the first and third quarters.

[3] Wells that are sampled annually shall be sampled during the third quarter.

[4] In the event the Discharger begins injecting into the INJ-14, EW-04 shall be sampled quarterly. If sulfolane, EDB, and DBCP concentrations show stable to decreasing trends, the sampling frequency for these analytical suites may be reduced to annual sampling with Central Valley Water Board staff concurrence.

[5] If sulfolane, EDB, and/or DBCP are not detected in the monitoring wells above the reporting limit for four consecutive routine quarterly sampling events, or the concentrations show stable to decreasing trends, the sampling frequency for these analytical suites may be reduced to semi-annual sampling for that well with Central Valley Water Board staff concurrence.

[6] If BHC isomers, OC and OP pesticides, and herbicides are not detected in the monitoring wells above their respective reporting limits for four consecutive routine quarterly sampling events, these analytical suites may be removed from the schedule for the well(s) with Central Valley Board staff concurrence. However, the City of Lathrop or any other municipal well(s) shall be sampled semi-annually.

[7] After four consecutive routine quarterly sampling events, if concentrations of these constituents show stable trends, then these analytical suites may be reduced to annual sampling with Central Valley Water Board staff concurrence.

[8] After four consecutive routine quarterly sampling events, if nitrate, chloride, sulfate, or total dissolved solids (TDS) concentrations show stable to decreasing trends then these analytical suites may be reduced to annual sampling with Central Valley Water Board staff concurrence.

[9] The treatment system effluent sampling results may be used to satisfy this requirement as all treated water is discharged through injection wells.

* All current and future injection wells may be removed from this Site-wide MRP and added to a revised WDR MRP for the Site's groundwater remediation system upon concurrence from staff at the Central Valley Water Board.

** New injection wells screened below the corcoran clay will be used to continuously monitor total volume, injection rate, and injection pressure. New injection wells screened above the corcoran clay will be used to continuously monitor total volume and injection rate, and injection pressure.

pH, Temperature and Conductivity shall be measured whenever a sample is submitted for laboratory analysis
EDB = Ethylene Dibromide
DBCP = 1,2-Dibromo-3-chloropropane
OC Pesticides = Organochlorine Pesticides
OP Pesticides = Organophosphorus Pesticides
Organochlorine Pesticides = Aldrin, Chlordane, DDD, DDE, DDT, Dieldrin, Heptachlor, Toxaphene
Organophosphorus Pesticides = DEF, Delnav, Dimethoate, Ethyl Parathion, Methly Parathion, Disyston
BHC Isomers = Benzene Hexachloride (alpha, beta, delta, and gamma isomers)
Herbicides = 2,4-D (Dichlorophenoxyacetic acid) and 2,4,5-T (Trichlorophenoxyacetic acid)
-- = Not Required or Not applicable
M = monthly sampling frequency
Q = quarterly sampling frequency
S = semi-annual sampling frequency
A = annual sampling frequency

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FORMER OCCIDENTAL CHEMICAL CORPORATION FACILITY, LATHROP
SAN JOAQUIN COUNTY

Table 2 ANALYTICAL METHODS

Sampling Parameter	Analytical Method[1]	Practical Quantitation Limit[2] (micrograms/liter)[3]
Fumigants	APPL Department of Health	
1,2-Dibromo-3chloropane (DBCP)	Services (DOHS) Method	0.01
Ethylene Dibromide (EDB)		0.01
Organochlorine Pesticides	EPA Method 8081A	
Aldrin		0.05
alpha-BHC		0.05
beta-BHC		0.05
delta-BHC		0.05
gamma-BHC		0.05
Chlordane		0.05
Dichlorodiphenyldichloroethane (DDD)		0.05
Dichlorodiphenyldichloroethylene (DDE)		0.05
Dichlorodiphenyltrichloroethane (DDT)		0.05
Dieldrin		0.05
Heptachlor		0.05
Toxaphene		5.0
Organophosphorus Pesticides	EPA 8141A	
DEF(S,S,S - Tributyltrithio-phosphate)		1.0
Delnav		1.0
Dimethoate		1.0
Ethyl Parathion		1.0
Mathyl parathion		1.0
Disyston		1.0
Herbicides	EPA Method 8151A	
2,4-D (Dichlorophenoxyacetic acid)		0.5
2,4,5-T (Trichlorophenoxyacetic acid)		0.1
Sulfolane	APPL SOP ANASULF or equivalent [4]	10
Inorganics	EPA Method 300	
Chloride		1 mg/L
Nitrate		0.1 mg/L
Sulfate		1 mg/L
Total Dissolved Solids	EPA Method 160.1	10 mg/L

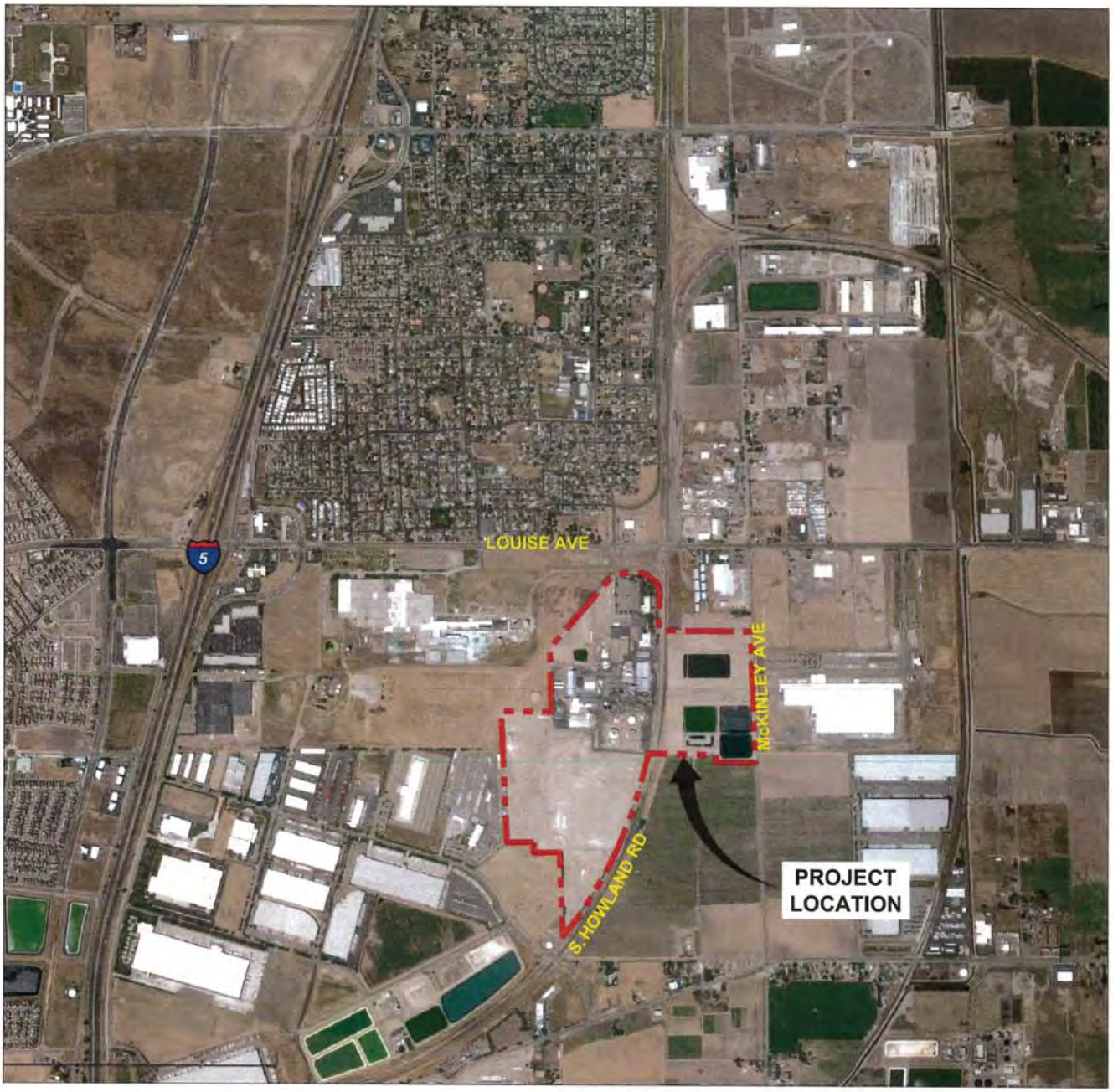
1 If necessary, equivalent analytical methods may be used with Central Valley Water Board staff concurrence. The Discharger shall provide written justification.

2 For non-detectable results at the practical quantitation limit.

3 Except where indicated.

4 In accordance with APPL laboratory provided information.

mg/L = milligram/liter.



MAP SOURCE: Google Earth Pro™ 2009, 37°48'25.10"N, 121°16'31.19"W

0 2000' 4000'

Approximate Scale: 1 in. = 2000 ft.

GLENN SPRINGS HOLDINGS, INC.
FORMER OCC - LATHROP FACILITY
LATHROP, CALIFORNIA

SITE LOCATION MAP

FIGURE
1

CITY: PETALUMA, CA DIV/GROUP: ENV DB: J. HARRIS LD:— PIC:— PM: D. EVANS TM: D. CATLIN-WRIGHT LYR:(Opt)ON=*;OFF=*REF*
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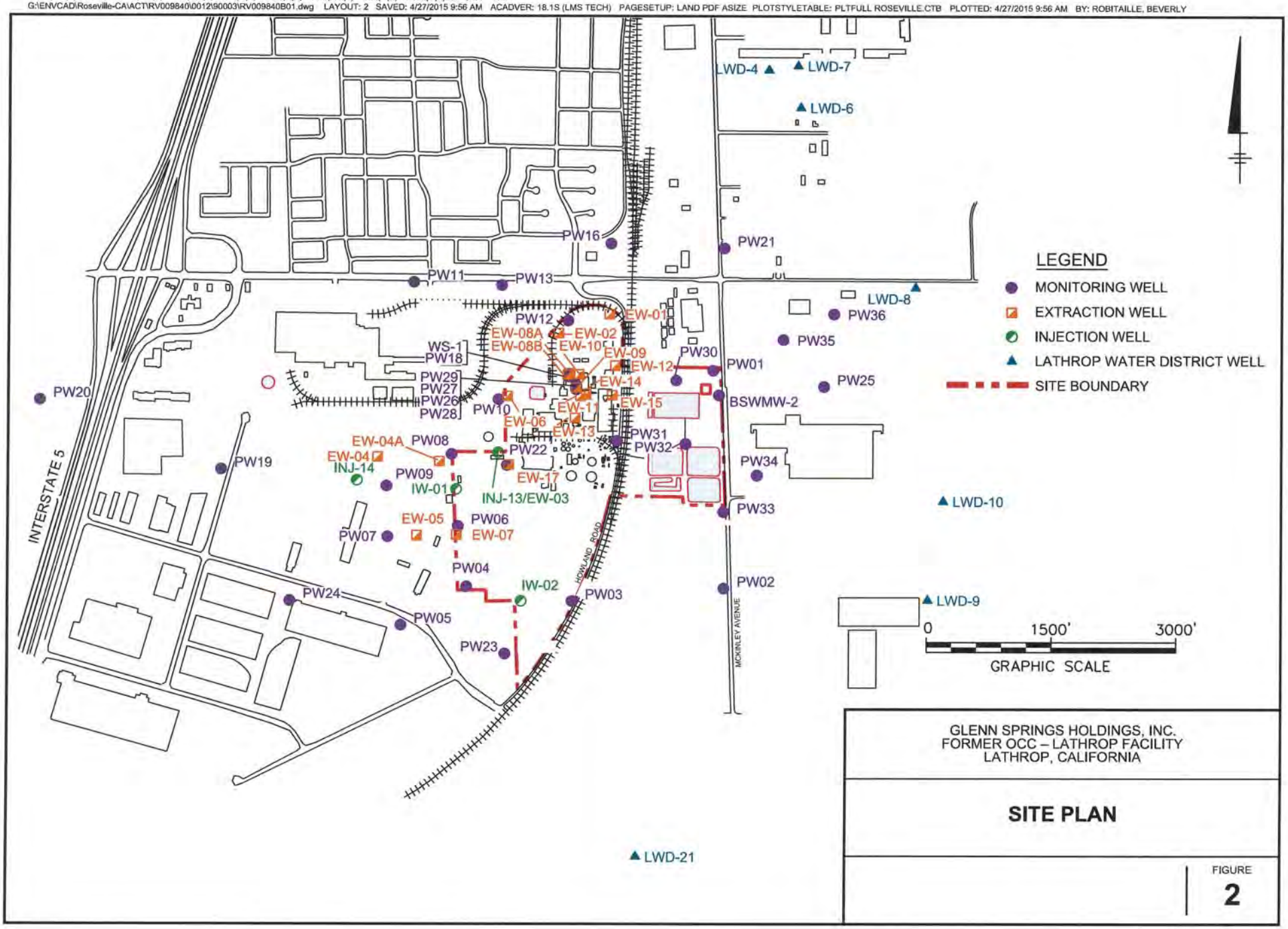

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SITE PLAN

FIGURE
2