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California Regional Water Quality Control Board Central Valley Region

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Edmund G. Brown Jr.
Governor

28 March 2011

Mr. Rick Nelinson
J.C. Penney Corporation, Inc.
6501 Legacy Drive
Plano, TX 75024
Mail Stop 2107

NOTICE OF APPLICABILITY OF GENERAL ORDER NO. R5-2008-0149 – J.C. Penney Corporation, and URS Corporation, Former J.C. Penney Store #1374, 6939 65th Street, Sacramento, In-Situ Remediation of Petroleum Hydrocarbons, Sacramento County

The Responsible Party (RP) J.C. Penney Corporation (J.C. Penney), and the project operator URS Corporation (URS) (collectively Dischargers) submitted a Notice of Intent dated 28 May 2010 and supplemental information dated 31 August 2010, requesting coverage under General Order No. R5-2008-0149, *General Waste Discharge Requirements for In-situ Groundwater Remediation at Sites with Volatile Organic Compounds, Nitrogen Compounds, Perchlorate, Pesticides, Semi-Volatile Compounds and/or Petroleum Compounds*. Based on information in your submittal, it is our determination that this project meets the required conditions to operate under Order No. 2008-0149. All of the requirements contained in the general order are applicable to your project. You are assigned Order No. R5-2008-0149-023.

Project Location:

The project is at 6939 65th Street in the City of Sacramento in Sacramento County, T8N, R5E, S99 M. Assessor's Parcel Nos. 042-0011-017.

Project Description:

Former operations of an underground tank system at the Former J.C. Penney Store in Sacramento caused pollution of the soil and groundwater. The primary pollutants of concern are petroleum hydrocarbon compounds, including total petroleum hydrocarbons as gasoline (TPH-G), and benzene, toluene, ethylbenzene and total xylenes (collectively BTEX). The site is currently occupied by a Wal-Mart store. In 2008, after more than 10 years of monitoring for natural attenuation, groundwater pollution remained at unacceptable levels.

California Environmental Protection Agency



Soil vapor extraction (SVE) began on 15 October 2008 under a permit from the Sacramento Metropolitan Air Quality Management District. Ozone injection pilot testing has been conducted since 30 September 2009. Pilot testing and bench scale testing were conducted to determine if ozone injection could be effectively applied to the groundwater to destroy hydrocarbons without causing deleterious effects (i.e. metals mobilization). Results of ozone injection bench scale and pilot testing showed that TPH-G and BTEX could be destroyed by ozone. No deleterious compounds were observed during either test.

For this project, the Dischargers submitted the following documents:

- *Final Remediation Plan (FRP)* dated 28 April 2005;
- *Addendum to Final Remediation Plan* dated 16 August 2005;
- *Evaluation of Ozone for the Destruction of Petroleum Hydrocarbons*, dated 16 November 2008;
- *Amended Contingency Plan, Ozone Sparge Test (Contingency Plan)* dated 14 August 2009;
- *December 2009 – Month 3 Ozone Pilot Test Monitoring Report (O&M Report)* dated 5 February 2010;
- *First Quarter 2010 Groundwater and Remediation Monitoring Report (1Q2010 Report)* dated 29 April 2010; and
- *Notice of Intent to Initiate Full-Scale Ozone Treatment (NOI)* dated 31 August 2010, which include copies of the above documents.

The NOI and FRP call for injection of ozone into 10 sparge wells, OZ-1 through OZ-10. About 38 grams per day (gm/day), but no more than 48 gm/day, of ozone will be injected. The 38 gm/day will be divided among the 10 sparge wells. Ozone sparge pilot testing was initiated on 30 September 2009 and has been shown to effectively reduce contaminant concentrations. No additional groundwater monitoring wells are needed or anticipated at this time. It is estimated that the project may last up to 5 years.

The Dischargers submitted a Contingency Plan, which commits to the following actions:

1. Cease ozone sparging in all ozone wells if an increase in hexavalent chromium (Cr^{+6}) concentrations of greater than 20% of baseline is observed in any treatment, transition, or compliance well. The Cr^{+6} sampling frequency will be increased to monthly in the affected wells.
2. Treatment area wells MW-2 and MW-22b are trigger wells. If the concentration of Cr^{+6} in either of these wells increases by greater than 20% of baseline and remain at those elevated levels for more than 75 days, then either well MW-2 or MW-22b will be used for low-flow extraction of groundwater to a Baker™ tank. Groundwater extraction will continue until Cr^{+6} concentrations return to baseline levels. URS will maintain pumps either pre-installed or available for installation into wells MW-2 and MW-22b while the ozone sparge system remains operational.

3. Resumption of ozone sparging will be evaluated after Cr⁺⁶ concentrations decrease to baseline levels.
4. The ozone injection program will be modified when/if concentrations of Cr⁺⁶ return to baseline levels. An example post contingency implementation ozone injection program modification would be to alternate month-long periods of ozone sparging and air-only sparging.

The Dischargers will also conduct groundwater sampling and report the results in accordance with the attached Groundwater Monitoring and Reporting Program Order. If the Discharger desires to modify the injectants, a revised Notice of Intent must be submitted and a new Notice of Applicability received prior to proceeding with any addition or modification to the proposed injection project.

No comments were received on the draft Notice of Applicability and Monitoring and Reporting Program during the 30-day public comment period ending 17 March 2011.

General Information:

1. The project will be operated in accordance with the requirements contained in the General Order and in accordance with the information submitted in the Notice of Intent.
2. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this Notice of Applicability is officially revoked.
3. The Dischargers shall comply with the attached General Order No. R5-2008-0149, *General Waste Discharge Requirements for In-situ Groundwater Remediation at Sites with Volatile Organic Compounds, Nitrogen Compounds, Perchlorate, Pesticides, Semi-Volatile Compounds and/or Petroleum Compounds*.
4. Injection of materials other than ozone into the subsurface is prohibited, unless, as specified in Order No. R5-2008-0149, analysis of the injectant is provided and approval is given by Board staff.
5. Failure to abide by the conditions of the General Order could result in an enforcement action as authorized by provisions of the California Water Code.
6. The Dischargers will implement the contingency plan included as part of the Notice of Intent within 30 days of it being triggered.
7. The Dischargers shall comply with the attached Monitoring and Reporting Program, Order No. R5-2008-0149-023, and any revisions thereto as ordered by the Executive Officer.

Notice of Applicability
Former JCPenney Store #1374
6939 65th Street
Sacramento, Sacramento County

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28 March 2011

If you have any questions regarding this matter, please call Vera Fischer at (916) 464-4792 or contact her at vfischer@waterboards.ca.gov.

original signed by Frederick Moss for

PAMELA C. CREEDON
Executive Officer

Attachment: General Order No. R5-2008-0149

cc: Della Kramer, Regional Water Quality Control Board, Sacramento
Charley Langer, Sacramento County Environmental Management, Sacramento
Tony Mindling, URS Corporation, Sacramento

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM R5-2008-0149-023-R (Revised)

FORMER JCPENNEY STORE #5380
6939 65TH STREET, SACRAMENTO
SACRAMENTO COUNTY

This revised Monitoring and Reporting Program (MRP) imposes requirements for monitoring the groundwater impacts from the unauthorized release of fuels from former underground storage tanks as well as the operation of an in-situ groundwater treatment system at 6939 65th Street, Sacramento, Sacramento County (the "Site"). This MRP is issued pursuant to Water Code section 13267. No changes shall be implemented to this MRP unless and until a revised MRP is issued by the Assistant Executive Officer. As appropriate, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff shall approve specific sample station locations prior to the implementation of sampling activities.

The Assistant Executive Officer of the Central Valley Water Board hereby finds:

1. In 1992, sampling results collected as part of a separate investigation into contamination that had been discharged at the former Chevron Station at 6900 65th Street indicated that past operations of an underground storage tank (UST) system at the Site had resulted in petroleum hydrocarbon pollution in soil and groundwater.
2. Sacramento County opened an environmental case in 1991 and named JCPenney Corporation, Inc. (JCPenney) as a primary responsible party, and named Bridgestone/Firestone, Inc. (a prior owner of the Site) and the General Electric Pension Trust (which owned the Site at the time) as secondary responsible parties. The property was subsequently sold to Skysan Limited Partnership, Oates Florin Mall LLC, and finally Wal-Mart Stores, Inc. (the current property owner).
3. The Board issued MRP Order R5-2009-0816 on 29 April 2009 to JCPenney, Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, and Wal-Mart Stores, Inc. All of these entities were identified as responsible parties for cleanup of the Site due to their past ownership of the Site. MRP Order R5-2009-0816 was issued to compel the responsible parties to delineate groundwater pollutant plumes and determine whether remediation efforts were effective.
4. The Central Valley Water Board issued General Waste Discharge Requirements Order R5-2008-0149 (the "General In-Situ Order") on 11 September 2008 to provide regulatory coverage for the in-situ remediation of volatile organic compounds (VOCs), petroleum hydrocarbons, perchlorate and fumigants by biological, chemical, and/or physical treatment processes.
5. On 28 March 2011, the Board issued JCPenney a Notice of Applicability (NOA), which granted regulatory coverage for JCPenney's groundwater remediation under the General In-Situ Order. The NOA allows for the injection of ozone into 10 sparge wells, OZ-1 through OZ-10, at approximately 38 grams per day (gm per day) but no more than 48 gm/day.
6. The Board issued MRP Order R5-2008-0149-023 to monitor the effects of ozone injection conducted pursuant to the General In-Situ Order, including the potential mobilization of breakdown products.
7. There are currently two MRPs that impose monitoring requirements at the Site. To reduce this redundancy, and to simplify compliance, MRP Order R5-2009-0816 is rescinded by this revision to to MRP Order R5-2008-0149-023, which replaces previous requirements.

8. As shown on **Figure 1** (attached to this MRP and hereby incorporated by reference), there are 25 groundwater monitoring wells, 2 soil vapor extraction (SVE) wells, 18 soil gas piezometers, and 10 ozone injection wells associated with the Site.
9. Site wells monitor groundwater at three different zones within the aquifer underlying the Site: "A", "B", and "C". "A" zone wells monitor the current water table and are screened above 60 feet below ground surface (bgs). "B" zone wells are screened between 60 and 90 feet bgs. "C" zone wells are screened deeper than 90 feet bgs down to 116 feet bgs.
10. Monitoring wells are grouped as follows:

Table 1: Well Numbers and Monitoring Objectives

Well Number ¹	Monitoring Objective
MW-18, MW-20A/B/C and MW-26A/B/C	Compliance ²
MW-1, MW-2, MW-25A/B, and MW-22B/C	Treatment Zone ³
MW-23	Transition Zone ⁴
MW-4, MW-11	Background ⁵
MW-21A/B/C MW-24A/B/C MW-27A/B/C	Perimeter ⁶

- ¹ Well numbers as shown on **Figure 1**.
- ² Wells used to determine compliance with groundwater limitations.
- ³ Wells sampled to evaluate remedy effectiveness inside the treatment zone.
- ⁴ Wells sampled to evaluate migration of pollutants and by-products within the transition zone.
- ⁵ Wells used to establish natural background water quality.
- ⁶ Wells used to monitor down-gradient or cross-gradient extent of pollution.

ESTABLISHMENT OF BACKGROUND CONCENTRATION VALUES

11. Based on available Site data, the responsible parties have concluded that dissolved chromium in the form of hexavalent chromium (Cr⁺⁶) is naturally-occurring in groundwater. The highest background detection of hexavalent chromium in groundwater to date is 16 ug/L. The contingency plan detailed in the NOI, if concentrations of Cr⁺⁶ greater than 20% of background are observed in any treatment, transition, or compliance well, is to cease ozone sparging in all wells, and the Cr⁺⁶ sampling frequency will be increased to monthly in the affected wells. Treatment area wells MW-2 and MW-22B are trigger wells; if the concentration of Cr⁺⁶ in either of these wells increases by greater than 20% of background and remain at those elevated levels for more than 75 days, then either well MW-2 or MW-22B will be used for low-flow extraction of groundwater to a Baker™ tank. Groundwater extraction will continue until Cr⁺⁶ concentrations return to background levels.

LEGAL PROVISIONS

12. The Central Valley Water Board's *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins*, Fourth Edition, revised October 2011 ("Basin Plan") designates beneficial uses of the waters of the State, establishes water quality objectives (WQOs) to protect these uses, and establishes implementation policies to implement WQOs. The Basin Plan designates groundwater beneath the Site as supporting the municipal and domestic water supply (MUN), agricultural supply (AGR), industrial supply (IND), and industrial process supply (PRO) beneficial uses.
13. The Basin Plan contains a narrative water quality objective for chemical constituents which requires, in part, that groundwater not contain chemical constituents in concentrations that adversely affect any beneficial use. For groundwater that is designated as supporting the MUN beneficial use, the Basin Plan incorporates by reference drinking water maximum contaminant levels ("MCLs") promulgated in Chapter 15 of Title 22 of the California Code of Regulations ("Title 22").
14. The Basin Plan also establishes narrative water quality objectives for tastes and odors and toxicity. The tastes and odors water quality objective requires, in part, that groundwater not contain substances in concentrations that cause nuisance, adversely affect beneficial uses, or impart undesirable tastes and odors to municipal and domestic water supplies. The toxicity water quality objective requires, in part, that groundwater be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, and aquatic life.
15. Waste constituents associated with the release from the Site threaten to impart objectionable tastes and odors on groundwater, and threaten to produce detrimental physiological responses in human, plant, animal, and aquatic life, and thereby represents a threat to the beneficial uses of the groundwater.
16. Water Code 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.

JCPenney, Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, and Wal-Mart Stores, Inc. are subject to this MRP because they owned the Site following an unauthorized release of a hazardous substance, and therefore are considered a "person who has discharged . . . waste" within the meaning of Water Code section 13267. The monitoring reports required by this MRP are needed to ensure protection of waters of the State and to protect public health.
17. The burden of complying with this MRP bears a reasonable relationship to the Board's need for the reporting and the benefits to be obtained from the reports. The requested information is necessary to obtain information to ascertain the effectiveness of the in-situ remediation and to protect human health and the environment.
18. Although JCPenney, Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, and Wal-Mart Stores, Inc. are all legally responsible for the pollution at the Property, the Board has the discretion to name a party that has taken the lead at a

cleanup site as the “primary responsible party” and the remaining parties as “secondarily responsible parties” as long as the cleanup is progressing well. Because JCPenney has assumed the lead for the purposes of cleaning up the Site, including applying for and operating under the General In-Situ Order, the Board chooses to exercise its discretion to name JCPenney as the primary responsible party and all remaining parties as secondarily responsible parties. The Board will therefore look to JCPenney first to comply with the provisions of this MRP.

IT IS HEREBY ORDERED that, pursuant to Water Code section 13267, MRP Order R5-2009-0816 is hereby rescinded and MRP Order R5-2008-0149-023 hereby replaced with the following requirements, which direct JCPenney, Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, and Wal-Mart Stores, Inc. to comply with Monitoring and Reporting Provisions 1 through 15 of this Order below, pursuant to the following protocol:

PRIMARY/SECONDARY RESPONSIBILITY PROTOCOL

- a. At the time of this Order, JCPenney, has taken the lead and shall continue to take the lead to comply with this MRP and the General In-Situ Order, and has committed to complying with Monitoring and Reporting Provisions 1 through 15, below.
- b. Should the Central Valley Water Board determine that JCPenney has failed to timely comply with any requirements(s) of the MRP, then the Central Valley Water Board may notify and require Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, and Wal-Mart Stores, Inc. to perform these requirements in place of JCPenney.
- c. If the Central Valley Water Board determines that Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, or Wal-Mart Stores, Inc. should comply with the monitoring requirements(s) of the MRP in place of JCPenney, the Board will provide those responsible parties with notice of JCPenney’s non-compliance and shall grant and notify those responsible parties in writing of a reasonable period of time (a “Cure Period”) to implement the monitoring requirements. The Central Valley Water Board shall determine an appropriate Cure Period on a case-by-case basis, depending upon the nature of the required monitoring, however, in no event shall the Cure Period be less than thirty or more than ninety days.
- d. During the Cure period, the Central Valley Water Board shall not take enforcement actions against Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, or Wal-Mart Stores, Inc..
- e. In the event that the Central Valley Water Board requires Bridgestone/Firestone Inc., General Electric Pension Trust, Skysan Limited Partnership, Oates Florin Mall LLC, or Wal-Mart Stores, Inc. to implement the monitoring requirements as set forth in this section above, then the submittal of the required report by the last date of the Cure Period shall constitute compliance with the applicable MRP requirement.

GROUNDWATER MONITORING REQUIREMENTS

Monitoring and reporting shall be conducted in compliance with the following specifications:

1. All samples should be representative of the volume and nature of the discharge or matrix of material sampled.

2. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form.
3. Monitoring wells with free phase petroleum product or visible sheen shall be monitored, at a minimum, for product thickness and depth to water.
4. Sample collection and analysis shall follow standard EPA protocol. The volume of extracted groundwater, if applicable, shall also be provided in quarterly monitoring reports.
5. Groundwater monitoring wells are grouped based on monitoring objectives described in Table 1 (see Finding No. 10), sampling frequency is outlined in Table 2, and the analytical methods are described in Table 3, below:

Table 2: Sampling Frequency

	Quarterly	Semi-Annually	Annually
Well ID	MW-1 MW-2 MW-22B MW-23 MW-25B	MW-20B MW-21B MW-24B MW-26B MW-27B	MW-4 MW-11 MW-18 MW-20A MW-20C MW-21A MW-21C MW-22C MW-24A MW-24C MW-25A MW-26A MW-26C MW-27A MW-27C

Table 3: Analytical Methods

Constituent	Method ¹	Maximum Practical Quantitation Limit (ug/L) ²
TPH-Gasoline ³	EPA 8260B or 8020 or SW8015	50
TPH-Diesel	EPA 8015M	50
TPH-Motor Oil	EPA 8015M	50
Benzene	EPA 8260B	0.50
Toluene	EPA 8260B	0.50
Ethylbenzene	EPA 8260B	0.50
Total Xylenes	EPA 8260B	0.50
Hexavalent Chromium ⁴	EPA 7199	1.0

¹ Or an equivalent EPA Method that achieves the same or lower Practical Quantitation Limit.

² All concentrations between the Method Detection Limit and the Practical Quantitation Limit shall be reported as a trace value.

³ Report all discrete peaks identified during the normal course of analysis for chemicals of concern.

⁴ Analysis required only when ozone inject is occurring and for one year following the end of injection, or as requested by of staff.

FIELD SAMPLING

6. In addition to the above sampling and analysis, field sampling and analysis shall be conducted each time a monitoring well is sampled. The sampling and analysis of field parameters shall be as specified in Table 4.

Table 4: Field Sampling Requirements

Parameters	Units	Type of Sample
Groundwater Elevation	Feet, Mean Sea Level	Measurement +/-0.01 feet
Oxidation-Reduction Potential	Millivolts	Grab
Electrical Conductivity	uhmos/cm	Grab
Dissolved Oxygen	mg/L	Grab
pH	pH Units (to 0.1 units)	Grab

7. Field test instruments (such as those used to test pH and dissolved oxygen) may be used provided that:
 - a. The operator is trained in proper use and maintenance of the instruments.
 - b. The instruments are calibrated prior to each monitoring event.
 - c. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency.
 - d. Field calibration reports are submitted as described in item (10b) of the "Reporting" section of this MRP.

DISCHARGE MONITORING

8. The discharge of water and amendments that are injected into the groundwater shall be monitored daily according to the requirements specified in Table 5. Each amendment addition shall be recorded individually, along with information regarding the time period over which the amendment was injected into the aquifer.

Table 5: Discharge Monitoring Requirements

Parameters	Units	Type of Sample
Injected Volume of Ozone	grams per hour	Meter

REPORTING

9. When reporting the data, the information it shall be arranged 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.
10. Central Valley Water Board staff shall be notified within 48 hours of any unscheduled shutdown of any SVE and/or ozone injection systems. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall also be reported to the Central Valley Water Board staff.
11. 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.
12. Quarterly electronic data reports shall conform to the requirements of the California Code of Regulations, Title 23, Division 3, Chapter 30. The quarterly reports shall be submitted electronically over the internet to the Geotracker database system by the **1st day of the second month following the end of each calendar quarter (i.e., by 1 February, 1 May, 1 August and 1 November)** until such time as the Assistant Executive Officer determines that the reports are no longer necessary. Each quarterly 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(s) 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.
 - d. Pollutant concentration maps for all groundwater zones.

- 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. Cumulative data tables containing the water quality analytical results and depth to groundwater.
 - h. A copy of the laboratory analytical data report, which may be submitted in an electronic format.
 - i. The status of any ongoing remediation, including an estimate of the cumulative 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.
13. An Annual Report shall be submitted to the Central Valley Water Board, electronically over the internet to the Geotracker database system, 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 fourth quarterly monitoring report. The Annual Report shall contain the following minimum information:
- a. Both tabular and graphical summaries of all data obtained during the year.
 - b. Groundwater contour maps and pollutant concentration maps containing all data obtained during the previous year.
 - c. A discussion of the long-term trends in the concentrations of the pollutants in the groundwater monitoring wells.
 - d. An analysis of whether the pollutant plume is being effectively treated.
 - e. 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.
 - f. An identification of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
 - g. If desired, a proposal and rationale for any revisions to the groundwater sampling plan frequency and/or list of analytes.
14. A letter transmitting the monitoring reports shall accompany each report. Such a letter shall include a discussion of requirement violations found during the reporting period, and actions taken or planned for correcting noted violations, such as operation or facility modifications. If the Discharger has previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

The above monitoring program shall be implemented on the first day of the month following the issuance of this Order.

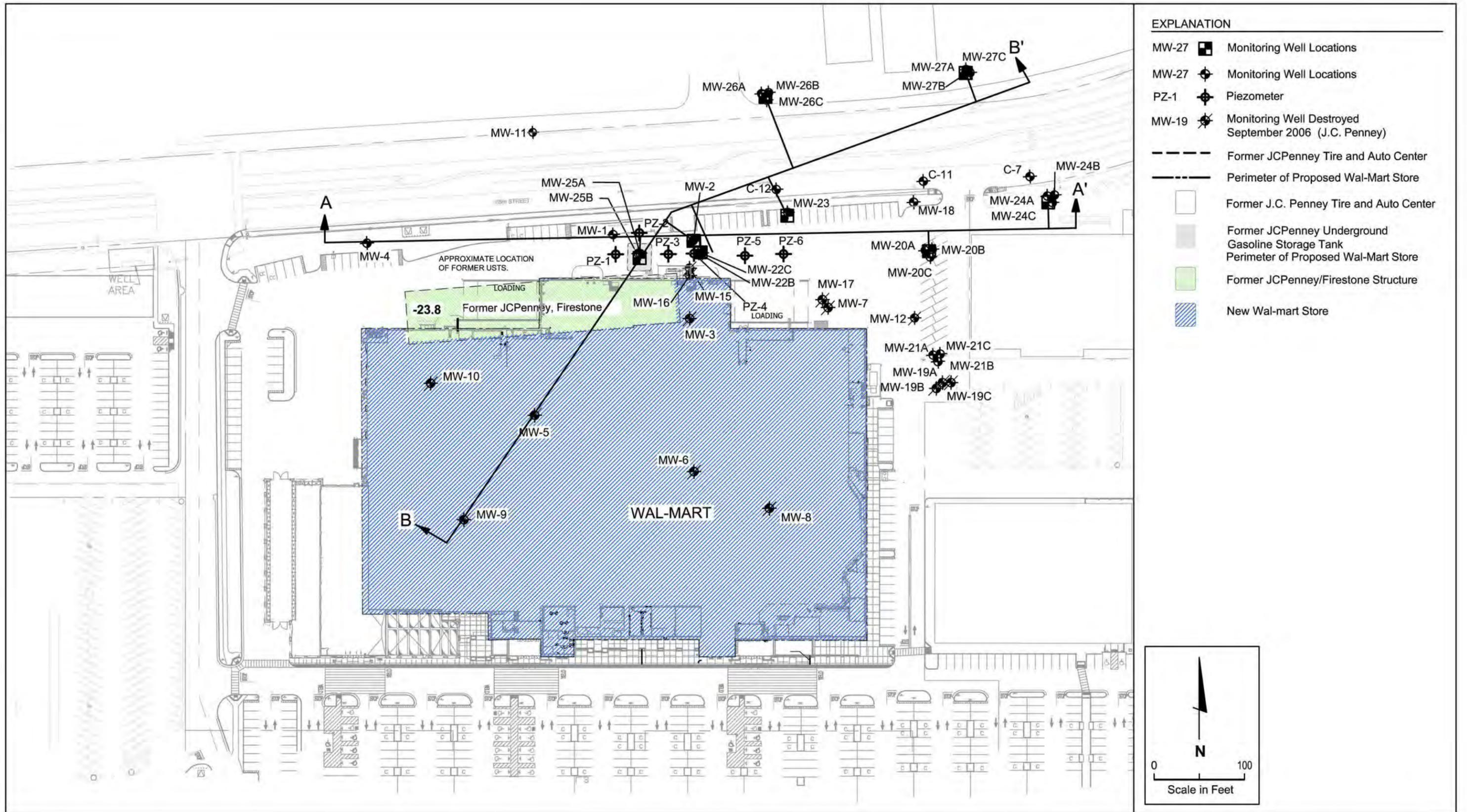
Ordered by:



ANDREW ALTEVOGT
Assistant Executive Officer

4/1/15

(Date)



SITE MAP WITH CROSS-SECTION LOCATIONS

Groundwater and Remediation Monitoring Report

JCPenney Store # 5380

6939 65th Street

Sacramento, California

FIGURE 2