California Regional Water Quality Control Board
Santa Ana Region

Terry Tamminen
Secretary for Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
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Arnold Schwarzenegger
Governor

December 22, 2004

Charles S. Troy, Corporate Vice President
Bell Industries, Inc.
1960 E. Grand Avenue, Suite #560
El Segundo, CA 90245

REVISED WASTE DISCHARGE REQUIREMENTS, ORDER NO. R8-2002-0007, NPDES NO. CAG918001, GROUNDWATER CLEANUP PROJECT, BELL INDUSTRIES INC., 1831 RITCHEY STREET, SANTA ANA, ORANGE COUNTY-- DISCHARGE AUTHORIZATION NO. R8-2002-0007-096

Dear Mr. Troy:

On August 2, 2002, you were issued an authorized to discharge treated groundwater from the above-referenced site to a storm drain under the terms and conditions of Order No. R8-2002-0007. On December 6, 2004, your consultant, URS Corporation, requested a revision of the Monitoring and Reporting Program No. R8-2002-0096. Based on our review, we find that a change of sampling frequency for a number of constituents is appropriate. As requested, we are also granting approval to perform permit reporting on a quarterly basis. **Please note that additional constituents besides volatile organic substances are required to be monitored by the monitoring and reporting program.**

Order No. R8-2002-0007 will expire on January 1, 2007. However, if you wish to terminate coverage under this general permit prior to that time, please notify us as soon as possible so that we can rescind this authorization and avoid billing you. Orange County Public Facilities and Resources Department, Flood Control, has requested that we have dischargers in Orange County call Doug Witherspoon at (714) 834-2366 regarding local agency requirements for this discharge.

If you have any questions regarding the Order or the Monitoring and Reporting Program, please contact Valerie Jahn at (951) 782-4903.

Sincerely,

Gerard J. Thibeault
Executive Officer

Enclosure: REVISED MRP No. R8-2002-0007-096

cc w/encl: URS Corporation, Santa Ana – Gary Hann

cc w/o encl: US EPA Permits Issuance Section (WTR-5) – Terry Oda
State Water Resources Control Board, Division of Water Quality – Jim Maughan
Orange County Facilities and Resources Dept., Flood Control – Herb Nakasone
City of Santa Ana Resources Division – Steve Worrall

VJB/REV096GWCleanupBellSA-Letter

California Regional Water Quality Control Board
Santa Ana Region
REVISED
Monitoring and Reporting Program No. R8-2002-0007-096
NPDES No. CAG918001
for

Bell Industries, Inc.
Former Bell Industries Site
Groundwater Cleanup Project
1831 Ritchey Street
Santa Ana, Orange County

A. MONITORING GUIDELINES

Monitoring shall be in accordance with the following:

1. All sampling and sample preservation shall be in accordance with the current edition of "*Standard Methods for the Examination of Water and Wastewater*" (American Public Health Association).

2. All laboratory analyses shall be performed in accordance with test procedures under 40 CFR 136 (revised as of May 14, 1999) "Guidelines Establishing Test Procedures for the Analysis of Pollutants," promulgated by the United States Environmental Protection Agency (EPA), unless otherwise specified in this monitoring and reporting program (M&RP). In addition, the Regional Board and/or EPA, at their discretion, may specify test methods that are more sensitive than those specified in 40 CFR 136. Unless otherwise specified herein, organic pollutants shall be analyzed using EPA method 8260, as appropriate, and results shall be reported with ML or PQL and MDL.

3. Chemical, bacteriological, and bioassay analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services or EPA or at laboratories approved by the Executive Officer of the Regional Board.

4. In conformance with federal regulations (40 CFR 122.45(c)), analyses to determine compliance with the effluent limitations for metals shall be conducted using the total recoverable method. However, in the event that individual concentration levels for lead show detectable amounts, the discharger shall also determine the individual dissolved metal concentration.

5. The discharger shall conduct acute toxicity testing as specified in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms (EPA/600/4-90/027F, August 1993). Using a control and 100% effluent, static non-renewal survival (pass/fail) tests for 96 hours shall be conducted using the two test species specified in the table below corresponding to the onsite groundwater salinity, for the first required annual test under this permit. Based on the results, the discharger shall determine the most sensitive test species. For the required succeeding toxicity monitoring, the discharger shall use the most sensitive species with prior approval from the Regional Board Executive Officer. The discharger shall submit documentation supporting the discharger's determination of the most sensitive test species. The effluent tests must be conducted concurrent with reference toxicant tests. The effluent and reference toxicant tests must meet all test acceptability criteria as specified in the acute manual[1]. If the test acceptability criteria are not achieved, then the discharger must re-sample and re-test within 14 days. The test results must be reported according to the acute manual chapter on Report Preparation, and shall be attached to the monitoring reports. The use of alternative methods for measuring acute toxicity may be considered by the Executive Officer on a case-by-case basis.

a. Test species:

IF THE EFFLUENT OR RECEIVING WATER SALINITY IS:	TEST SPECIES	TEST
Less than 1,000 mg/l salinity	Fathead minnow, *Pimphales promelas*	Larval survival test
	Water flea, *Ceriodaphnia dubia*	Survival test
Equal to or greater than 1,000 mg/l salinity	Silverside, *Menedia beryllina*	Survival Test
	Pacific mysid, *Holmesimysis costata*	Survival Test

b. In the event that the required annual toxicity test fails, the discharger shall stop any discharge of wastewater to waters of the U.S. and shall retest within 14 days of receiving the notice of failure and shall determine the cause of the failure. The discharger shall stop any discharge of wastewater to waters of the U.S. until such time that the cause of toxicity is determined and appropriately addressed. Commencement of any discharge shall be with prior approval by the Executive Officer.

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[1] *"Acute manual" refers to protocols described in "Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms" (EPA) 600/4-90-027, September 1991 or subsequent editions).*

6. The discharger shall multiply each measured or estimated congener concentration by its respective toxic equivalency factor (TEF) as shown below and report the sum of these values. The discharger shall use the U.S. EPA approved test method 1613 for dioxins and furans.

Toxic Equivalency Factors for 2,3,7, 8-TCDD Equivalents	
Congener	TEF
2,3,7,8-TetraCDD	1
1,2,3,7,8-PentaCDD	1.0
1,2,3,4,7,8-HexaCDD	0.1
1,2,3,6,7,8-HexaCDD	0.1
1,2,3,7,8,9-HexaCDD	0.1
1,2,3,4,6,7,8-HeptaCDD	0.01
OctaCDD	0.0001
2,3,7,8-TetraCDF	0.1
1,2,3,7,8-PentaCDF	0.05
2,3,4,7,8-PentaCDF	0.5
1,2,3,4,7,8-HexaCDF	0.1
1,2,3,6,7,8-HexaCDF	0.1
1,2,3,7,8,9-HexaCDF	0.1
2,3,4,6,7,8-HexaCDF	0.1
1,2,3,4,6,7,8-HeptaCDF	0.01
1,2,3,4,7,8,9-HeptaCDF	0.01
OctaCDF	0.0001

7. All analytical data shall be reported with method detection limits (MDLs) and with identification of either practical quantitation levels (PQLs) or limits of quantitation (LOQs).

8. Laboratory data must quantify each constituent down to the Practical Quantitation Levels specified in Attachment "A". Any internal quality control data associated with the sample must be reported when requested by the Executive Officer. The Regional Board will reject the quantified laboratory data if quality control data is unavailable or unacceptable.

9. The discharger shall have, and implement, an acceptable written quality assurance (QA) plan for laboratory analyses. Duplicate chemical analyses must be conducted on a minimum of ten percent (10%) of the samples, or at least one sample per month, whichever is greater. A similar frequency shall be maintained for analyzing spiked samples. When requested by the Board or EPA, the discharger shall participate in the NPDES discharge monitoring report QA performance study. The permittee must have a success rate equal to or greater than 80%.

10. All monitoring instruments and devices used by the discharger to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary to ensure their continued accuracy.

11. The flow measurement system shall be calibrated at least once per year or more frequently, to ensure continued accuracy.

12. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Influent samples shall be taken at each point of inflow to the treatment system and shall be representative of the influent to the treatment system. Effluent samples shall be taken downstream of the last addition of waste to the treatment or discharge works where a representative sample may be obtained prior to mixing with the receiving waters.

13. Whenever the discharger monitors any pollutant more frequently than is required by this Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the discharge monitoring report specified by the Executive Officer.

14. The discharger may request a reduction in the constituents to be monitored and/or a reduction in monitoring frequency for a specific constituent(s) subject to the approval of the Executive Officer when the conditions stipulated in Provisions E.13. of this Order are met.

15. The discharger shall monitor weekly those constituents that are detected at levels of concern[2] in the required priority pollutant scan or in the required organic scan using EPA Method 8260.

16. The discharger shall assure that records of all monitoring information are maintained and accessible for a period of at least five years from the date of the sample, report, or application. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge or by the request of the Board at any time. Records of monitoring information shall include:

    a. The date, exact place, and time of sampling or measurements;

    b. The individual(s) who performed the sampling, and/or measurements;

    c. The date(s) analyses were performed;

    d. The individual(s) who performed the analyses;

    e. The analytical techniques or methods used;

    f. All sampling and analytical results;

    g. All monitoring equipment calibration and maintenance records;

    h. All original strip charts from continuous monitoring devices;

    i. All data used to complete the application for this Order; and,

    j. Copies of all reports required by this Order.

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[2] *Levels of concern are detected values 50% or greater than the criteria values specified for Priority Pollutants in the California Toxics Rule (see Federal Register/Vol. 65, No. 97 / Thursday, May 18, 2000/ Rules and Regulations) and the national; recommended water quality criteria for non-priority pollutants (see Federal Register / Vol. 63, No. 237 / Thursday, December 10, 1998/ Notices, Pages 68360 & 68361) or Maximum Contaminant Level (MCL) and Action Levels (AL) adopted by the Department of Health Services.*

17. Discharge monitoring data shall be submitted in a format acceptable to the Regional Board. Specific reporting format may include preprinted forms and/or electronic media. Unless otherwise specified, discharge flows shall be reported in terms of daily average discharge flows. The results of all monitoring required by this Order shall be reported to the Board, and shall be submitted in such a format as to allow direct comparison with the limitations and requirements of this Order.

18. The discharger shall deliver a copy of each monitoring report in the appropriate format to:

California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

19. Weekly samples shall be collected on a representative day of each week.

20. Monthly and quarterly samples shall be collected on a representative day of the month/quarter.

21. Annual samples shall be collected on the month the discharge authorization letter was issued.

B. INFLUENT MONITORING:

A grab sample of the influent to the treatment system shall be monitored on a monthly basis for total petroleum hydrocarbons and benzene, toluene, xylenes, ethylbenzene, 1,4 dioxane, methyl tertiary butyl ether (MTBE), tert butyl alcohol (TBA), tert-amyl methyl ether (TAME), ethyl tert butyl ether (ETBE), isopropyl ether (DIPE), tetrachlorethylene (PCE), trichloroethylene (TCE), 1,1-dichloroethane (1,1-DCA), and 1,1,1-trichloroethane (1,1,1-TCA), 1,1-dichloroethylene (1,1-DCE), 1,2-dichloroethylene (1,2-DCE), chloroform, methyl ethyl ketone, and methyl isobutyl ketone by EPA Method 8260, full scan.

C. EFFLUENT MONITORING:

1. The following shall constitute the effluent monitoring program:

CONSTITUENT[3]	TYPE OF SAMPLE	UNITS	MINIMUM FREQUENCY OF SAMPLING & ANALYSIS
Flow	------	GPD	Daily for one week and weekly thereafter
Total Petroleum Hydrocarbons[4]	Grab	µg/l	Quarterly

[3] *For testing organic volatile compounds use EPA Method 8260 and report entire suite of detected constituents at level of concern (see footnote 2, above).*

[4] *Total Petroleum Hydrocarbons with gasoline distinction. TPH-G (Modified 8015) must include analysis for carbon range C4 through C12.*

CONSTITUENT[3]	TYPE OF SAMPLE	UNITS	MINIMUM FREQUENCY OF SAMPLING & ANALYSIS
Benzene	Grab	µg/l	Quarterly
Toluene	"	"	"
Xylene	"	"	"
Ethylbenzene	"	"	"
Methyl Tertiary Butyl Ether (MTBE)	"	"	"
Tert Butyl Alcohol (TBA)	"	"	"
Tert-Amyl Methyl Ether (TAME)	"	"	"
Ethyl Tert Butyl Ether (ETBE)	"	"	"
Isopropyl ether (DIPE)	"	"	"
Chloroform	"	"	"
Carbon Tetrachloride	"	"	"
1,1-Dichloroethane (1,1-DCA)	"	"	"
1,1-Dichloroethylene (1,1-DCE)	"	"	"
1,2-Dichloroethylene (1,2-DCE)	"	"	"
Dichlorobromomethane	"	"	"
1,1,1-Trichloroethane (1,1,1-TCA)	"	"	"
Tetratchloroethylene (PCE)	"	"	"
Trichloroethylene (TCE)	"	"	"
Methyl Ethyl Ketone	"	"	"
Methyl Isobutyl Ketone	"	"	"
Naphthalene	"	"	"
1,4-dioxane	"	"	"
Total Suspended Solids	"	mg/l	Quarterly
Total Residual Chlorine[5]	"	"	"
Total Dissolved Solids	"	"	"
Total Inorganic Nitrogen (TIN)	"	"	"
Ethylene Dibromide (EDB)	"	µg/l	Annually
Total Phenols	"	"	"
Perchlorate	"	"	"
Selenium	"	"	"
Sulfide	"	"	"
Total Recoverable Lead	"	"	"
Hardness	"	mg/l	"
2,3,7,8-TetraCDD	"	µg/l	Annually (See A.6. & A.21.)
1,2,3,7,8-PentaCDD	"	"	"
1,2,3,4,7,8-HexaCDD	"	"	"
1,2,3,6,7,8-HexaCDD	"	"	"
1,2,3,7,8,9-HexaCDD	"	"	"
1,2,3,4,6,7,8-HeptaCDD	"	"	"
OctaCDD	"	"	"
2,3,7,8-TetraCDF	"	"	"
1,2,3,7,8-PentaCDF	"	"	"
2,3,4,7,8-PentaCDF	"	"	"
1,2,3,4,7,8-HexaCDF	"	"	"

[5] *If chlorine is used for treatment or disinfection of wastes.*

CONSTITUENT[3]	TYPE OF SAMPLE	UNITS	MINIMUM FREQUENCY OF SAMPLING & ANALYSIS
1,2,3,6,7,8-HexaCDF	"	"	"
1,2,3,7,8,9-HexaCDF	Grab	µg/l	Annually (See A.6. & A.21.)
2,3,4,6,7,8-HexaCDF	"	"	"
1,2,3,4,6,7,8-HeptaCDF	"	"	"
1,2,3,4,7,8,9-HeptaCDF	"	"	"
OctaCDF	"	"	"
Priority Pollutant (see Attachment "B")	"	"	Annually
Toxicity Testing (see paragraph A.5., above.)	Grab	Pass/Fail	At the initiation of the project and annually thereafter (see paragraph A.21., above)

2. The monitoring frequency for those priority pollutants that are detected during the required annual monitoring at a concentration greater than fifty percent of the most stringent applicable receiving water objective (freshwater or human health (consumption of organisms only) as specified for that pollutant in 40 CFR 131.38[6]) shall be accelerated to quarterly for one year following detection. To return to the annual monitoring frequency, the discharger shall request and receive approval from the Regional Board's Executive Officer or designee.

3. The discharger may request a reduction in the monitoring frequency when appropriate in accordance with Section E.14 of the Order.

D. REPORTING:

Reporting shall be in accordance with the following:

1. All monitoring reports, or information submitted to the Regional Board shall be signed and certified in accordance with 40 CFR 122.22 and shall be submitted under penalty of perjury.

2. All reports shall be arranged in a tabular format to clearly show compliance or noncompliance with each discharge limitation.

3. One week before groundwater extraction, treatment, and discharge is commenced, the discharger shall notify the Regional Board or its designated compliance officer by email and/or orally by telephone.

4. If no discharge occurs during the previous monitoring period, a letter to that effect shall be submitted in lieu of a monitoring report.

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6 *See Federal Register / Vol. 65, No. 97 / Thursday, May 18, 2000 / Rules and Regulations.*

5. The discharger shall notify the Regional Board in writing when groundwater treatment and discharge is stopped for more than a week. The report shall include a discussion as to why groundwater remediation is stopped and when treatment will commence.

6. For every item of monitoring data where the requirements are not met, the monitoring report shall include a statement discussing the reasons for noncompliance, and of the actions undertaken or proposed which will bring the discharger into full compliance with requirements at the earliest time, and an estimate of the date when the discharger will be in compliance. The discharger shall notify the Regional Board by letter when compliance with the time schedule has been achieved.

7. Noncompliance Reporting

   a. The discharger shall report any noncompliance that may endanger health or the environment. Any information shall be provided to the Executive Officer (909-782-4130) and the Office of Emergency Services (1-800-852-7550) orally within 24 hours from the time the discharger becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause, the period of noncompliance, including exact dates and times and, if the noncompliance has not been corrected, the anticipated time it is expected to continue, and, steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

   b. Any violation of a maximum daily discharge limitation for any of the pollutants listed in this Order shall be included as information that must be reported within 24 hours.

   c. The Regional Board may waive the above required written report on a case-by-case basis.

8. Except for data determined to be confidential under Section 308 of the Clean Water Act (CWA), all reports prepared in accordance with the terms of this Order shall be available for public inspection at the offices of the Regional Water Quality Control Board and the Regional Administrator of EPA. As required by the CWA, effluent data shall not be considered confidential.

9. Monitoring reports shall be submitted by the 30th day of each month following the monitoring period and shall include:

   a. The results of all chemical analyses for the previous period, and annual samples whenever applicable,

   b. The daily flow data,

   c. A summary of the period's activities including a report detailing compliance or noncompliance with the task for the specific schedule date, and

d. For every item where the requirements are not met, the discharger shall submit a statement of the actions undertaken or proposed which will bring the discharge into full compliance with requirements at the earliest time and submit a timetable for correction.

Ordered by _____
Gerard J. Thibeault
Executive Officer

December 22, 2004