
Los Angeles Regional Water Quality Control Board

April 26, 2016

Mr. Wayne Worthington
Defense Logistics Agency – Energy
3171 N. Gaffey Street
San Pedro, CA 90731

GENERAL WASTE DISCHARGE REQUIREMENTS FOR ONSITE TREATMENT OF CONTAMINATED SOIL – DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (FILE NO. 90-60-146, ORDER NO. 90-148, CI-10118, GEOTRACKER GLOBAL ID. SLT43185183)

Dear Mr. Worthington:

On February 6, 2015, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) issued coverage of *General Waste Discharge Requirements for Land Treatment of Petroleum Hydrocarbon Contaminated Soil in Los Angeles and Santa Clara River Basins* (General WDRs, Regional Board Order No. 90-148) to the Defense Logistics Agency - Energy (Discharger) for the bio-remediation and onsite reuse of petroleum hydrocarbons contaminated soils at the Defense Fuel Support Point (DFSP) Norwalk (Site) at 15306 Norwalk Boulevard, Norwalk, California. The General WDRs were issued for a one-time, short term process, that was not anticipated to require in excess of 365 days to complete, at which time coverage of the General WDRs expires.

However, in a letter dated March 30, 2016, your consultant, The Source Group, Inc., informed Regional Board staff that the subject soil treatment operations had not been completed and requested a one-year extension of the General WDRs coverage. On April 19, 2016, the Discharger submitted a Report of Waste Discharge (ROWD) to the Regional Board to apply for continue coverage under the General WDRs for the bio-remediation and onsite reuse of petroleum hydrocarbons contaminated soils at the Site.

The Site is owned by the US Air Force and controlled through the office of March Air Reserve Base and was historically used to receive, store, and distribute military grade jet fuel. Active operations at the site ceased in the 1990s and tanks and other infrastructure were removed in 2012. As a result of past fuel handling operations, soil and groundwater at the Site have been contaminated with petroleum hydrocarbons. Remediation activities at the Site are currently overseen by the Regional Board Site Cleanup Program (SCP). Remediation of soil and groundwater, including removal of light non-aqueous phase liquid (LNAPL), has been on-going at the Site since 1994 and has resulted in the removal of the majority of LNAPL from the shallow aquifer and the removal and destruction of thousands of pounds of hydrocarbons present in the soil and groundwater.

Bio-remediation at the Site under the General WDRs has been carried out in treatment cells constructed in historical tank basins that are completely contained by berms that were originally constructed for secondary containment for tanks. Each treatment cell includes up to six

stockpile rows that are approximately 215 feet long, 20 feet wide, and 8 feet high. The rows are lined with 30-mil high density polyethylene (HDPE) liners and covered with heavy duty plastic sheets that are secured with sand bags. Before being placed in a treatment stockpile, contaminated soil is processed at an Earth Cleaning Machine (ECM) by adding US EPA approved bioremediation agent that contains a proprietary blend of non-pathogenic microbes and a safe surfactant to degrade petroleum hydrocarbons and other organic compounds into carbon dioxide and water. A vapor extraction system consists of PVC pipelines and motor blowers is used to induce fresh, oxygen rich air into the treatment rows and to mitigate the emission of volatile organic compounds (VOCs). Moisture content in the piles is controlled between 40 to 85 percent of field capacity. The stockpile rows are maintained and monitored until all chemicals of concern are reduced to site cleanup goals. Treated soil that meets site cleanup goals is used onsite for excavation backfill.

We have reviewed the ROWD, as well as the quarterly monitoring reports submitted to the Regional Board required under the General WDRs, and determined that the soil treatment operations at the Site should be continued and be regulated under the General WDRs. The cleanup goals for contaminated soil at the Site are included in letters from the Regional Board SCP staff dated July 12, 2012, and July 16, 2015, respectively (copies attached). Monitoring and reporting requirements for the bio-remediation project are included in the attached Monitoring and Reporting Program (MRP CI-10118). The cleanup goals and sampling frequencies may be modified if the Regional Board Executive Officer determines that such modifications are warranted. Enclosed is the WDRs package, including:

1. General Waste Discharge Requirements (Order No. 90-148)
2. Monitoring and Reporting Program (CI-10118)
3. Standard Provisions
4. Regional Board letter date July 12, 2012 (cleanup goals)
5. Regional Board letter dated July 16, 2015 (modification of cleanup goals)

Please note that coverage of the General WDRs is applicable only to bioremediation operations at the Site. The excavation, relocation and storage of contaminated soil, as well as the reuse treated soil, are regulated under SCP. The General WDRs only allow the land treatment of a maximum of 100,000 cubic yards of petroleum hydrocarbons contaminated soil within 365 days from the date of this letter. A separate ROWD must be filed and approved in advance by the Regional Board Executive Officer if either the volume of contaminated soil being treated exceeds 100,000 cubic yards or the treatment period exceeds 365 days.

If you have any questions about this matter, please contact Dr. Wen Yang, Chief of Land Disposal Unit at the Regional Board, at (213) 620-2253 or wen.yang@waterboards.ca.gov. Questions related to the remediation of the Site in general should be directed to Mr. Paul Cho, Case Manager from SCP, at (213)-576-6721 or paul.cho@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosures

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State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

ORDER NO. 90-148

GENERAL WASTE DISCHARGE REQUIREMENTS
FOR
LAND TREATMENT OF PETROLEUM HYDROCARBON CONTAMINATED SOIL
IN LOS ANGELES AND SANTA CLARA RIVER BASINS
(FILE NO. 90-60)

The California Regional Water Quality Control Board, Los Angeles Region, finds:

1. Soils contaminated with high concentrations of petroleum hydrocarbon, where identified and left unmitigated, are considered to be a discharge of waste that could affect the quality of the waters of the State, as defined in Section 13260 of the California Water Code.
2. Land treatment of these soils is proving to be an efficient and economical means of mitigating the effects of such hydrocarbon contamination. The threat to waters of the State is thereby eliminated or reduced to non-significant levels of contamination and the soil rendered suitable for reclamation and reuse. Such land treatment operations involve the discharge to land of petroleum hydrocarbon contaminated soil.
3. Section 2532(b)(5) of Chapter 15, Division 3, Title 23 of the California Code of Regulations, requires that Regional Boards shall specify in Waste Discharge Requirements, the elements of land treatment programs by dischargers who treat or dispose of wastes in land treatment waste management units.
4. Each month this Board receives a large number of Reports of Waste Discharge for the land treatment of hydrocarbon contaminated soils. Such requests far exceed the capacity of staff to review and bring to the Board for adoption, individual waste discharge requirements. These circumstances create the need for an expedited system for processing the numerous requests.

Revised October 22, 1990

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5. The adoption of general waste discharge requirements would 1) simplify the application process for dischargers, 2) free up staff for higher priority work, and 3) reduce Board time involved by enabling the Executive Officer to notify the discharger, in appropriate cases, of the applicability of the general requirements adopted by the Regional Board. The vast majority of these discharges is characterized by low volume, short term discharges to land primarily for the purpose of allowing reuse of the soil during site cleanup and development.
6. These general waste discharge requirements for land treatment of up to 100,000 cubic yards of petroleum hydrocarbon contaminated soil for durations not exceeding 365 days under the direction of the Executive Officer, would benefit the public, staff and the Board through a streamlined process without loss of significant regulatory oversight.
7. The Board adopted revised Water Quality Control Plans for Santa Clara River Basin and Los Angeles River Basin on April 27, 1978 and November 27, 1978, respectively. These Water Quality Control Plans contain water quality objectives for ground water for all Hydrologic Subareas within the Region. The requirements contained in this Order, as they are met, will be in conformance with the goals of these Water Quality Control Plans.
8. All ground waters in both the Los Angeles and Santa Clara River Basins have beneficial uses which include municipal and domestic supply, agricultural supply, industrial process supply, and groundwater recharge.
9. The waste discharge requirements contained in this order would regulate such land treatment programs in accordance with Title 23, Division 3, Chapter 15, of the California Code of Regulations.
10. The issuance of Waste Discharge Requirements for the discharges subject to these general requirements is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code pursuant to one or more of the following provisions:
 - (1) The lead agency has prepared a negative declaration

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based on findings pursuant to California Code of Regulations, Title 14, Chapter 3, Section 15070 which show that there will be no significant impact on water quality; or (3) The project would effect a minor alteration to the condition of land, and is exempt in accordance with Title 14, Chapter 3, Section 15304 of the California Code of Regulation.

11. This land treatment operation is a one time, short term process, and is not anticipated to require in excess of 365 days to complete at which time these requirements will expire.
12. These general waste discharge requirements are not intended to alter any existing working arrangements relating to cleanup cases with local governmental agencies.

The Board has notified the interested agencies and persons of its intent to adopt general waste discharge requirements for land treatment projects and has provided them with an opportunity to submit their written views and recommendations.

The Board in a public meeting heard and considered all comments pertaining to the tentative requirements.

IT IS HEREBY ORDERED THAT:

- A. This Order shall serve as General Waste Discharge Requirements for the temporary discharge of petroleum hydrocarbon contaminated soil to an on-site land treatment facility for land treatment processing of the soil. Upon receipt of a Report of Waste Discharge describing such a discharge, the Executive Officer shall determine if such discharge 1) involves 100,000 cubic yards or less of contaminated soil to be land treated, 2) involves a process that will bioremediate the contaminated soil to acceptable levels as determined by the Executive Officer, but not exceeding 1000 ppm, 3) will be completed within 365 days, and 4) is covered by adequate site assessment which characterizes the nature and extent of the soil contamination including sufficient water quality data, collected under the direction of an appropriate regulatory

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agency, to determine the impact on ground water resulting from such soil contamination. In the event the Executive Officer so finds, he shall notify the applicant (hereinafter called the Discharger) in writing that the proposed land treatment operation is subject to this Order.

Notwithstanding the provisions of the above paragraph, appropriate cases may be brought to the Board for adoption of individual requirements when the Executive Officer deems it desirable or necessary to do so.

- B. The operation of any temporary land treatment facility shall be in conformance with Title 23, Division 3, Chapter 15, of the California Code of Regulations, "Discharge of Waste To Land", including but not limited to Sections 2510; 2532(b-5); 2549; 2550; 2580; 2584; 2590 and the following special provisions:
1. Wastes discharged on-site for biodegradation by a land treatment process shall be limited to hydrocarbon contaminated soil found on site. No other waste material shall be imported for land treatment on-site. The land treatment process, which includes water, nutrients and bacterial addition to soil along with soil aeration in the treatment zone, shall be conducted in such a way that no contaminants are added to surface water or ground waters.
 2. For any proposed development on-site during the land treatment, closure and post-closure period, as defined in Title 23, Division 3, Chapter 15 of the California Code of Regulations, the discharger shall submit to this Board, written notification of such development.
 3. During the land treatment operations, surface runoff from the drainage area tributary to this site shall be prevented from passing over or percolating through the treatment zone. Adequate facilities shall be provided to divert all surface runoff from storms away from the treatment area.
 4. The treatment zone shall be bermed in such a way that storm water falling directly on the treatment zone will be contained. Standing water within the contained treatment zone shall be pumped down immediately and

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removed to treatment facilities on site or disposed of at a legal disposal site. For the purpose of this requirement, a legal point of disposal is defined as one for which waste discharge requirements have been established by a California Regional Water Quality Control Board, and which is in full compliance therewith.

5. No condition of pollution or nuisance shall be caused by the handling, treatment or reuse of the wastes or from any excavation operation conducted in association with this land treatment operation.
6. Odors from the handling, treatment or reuse of these wastes shall not be perceivable beyond the limits of the property owned or controlled by the discharger. The discharger shall demonstrate, to the satisfaction of the Executive Officer, a positive method for odor control, prior to beginning a full-scale land treatment operation.
7. All required state and local health department permits and/or variances and air quality permits and/or variances shall be obtained by the discharger prior to commencing the land treatment operation.
8. During full-scale operation of the land treatment operation, a sampling and analysis program shall be implemented, in accordance with a Monitoring and Reporting program prescribed by the Executive Officer, to verify that complete degradation and transformation of the petroleum hydrocarbon is occurring to levels approved by the Executive Officer. Reporting of this data shall comply with the Monitoring and Reporting Section of this Order.
9. Maximum land treatment zone thickness shall not exceed 18 inches or the maximum depth of penetration of the aeration equipment, whichever is less, except with prior written approval of the Executive Officer.

C. The following General Provisions Shall Apply:

1. A copy of these requirements shall be maintained at the discharge facility and be available at all times to operating personnel.

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2. In the event of any change in name, ownership, or control of these land treatment facilities, the discharger shall notify this Board in writing and shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be forwarded to the Board.
3. In the event the discharger is unable to comply with any of the conditions of this Order due to:
 - (a) Breakdown of waste treatment equipment,
 - (b) Accidents caused by human error or negligence,
 - (c) Other causes such as acts of nature,
 - (d) Facility operations,

The discharger must notify this Board by telephone within 24 hours of the incident and confirm it in writing within one week of the telephone notification.

4. In accordance with Section 13260 of the California Water Code, the discharger shall file a report with this Regional Board of any material change or proposed change in the character, location or volume of the discharge.
5. In accordance with Section 13267 of the California Water Code, the discharger shall furnish, under penalty of perjury, technical monitoring program reports; such reports shall be submitted in accordance with specifications prepared by the Executive Officer, which specifications are subject to periodic revisions as may be warranted.
6. Wastes discharged or reclaimed for reuse as soil backfill shall not contain any substance in concentrations toxic to human, animal, plant, or aquatic life.
7. Any off-site disposal of wastes shall be to a legal point of disposal and in accordance with the provisions of Division 7.5 of the Water Code. A legal point of disposal is defined in item A4 above.

8. The Regional Board and other authorized representative shall be allowed:
 - (a) Entry upon premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order;
 - (b) Access to copy any records that are kept under the conditions of this Order;
 - (c) To inspect any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
 - (d) To photograph, sample, and monitor for the purpose of assuring compliance with this Order, or as otherwise authorized by the California Water Code.

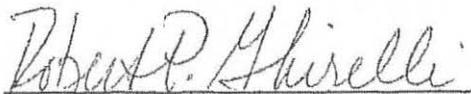
9. Following completion of the land treatment program on site, the discharger shall, implement a land treatment facility closure plan, which complies with the requirements of Article 8, Chapter 15, Division 3, Title 23, of the California Code of Regulations. As a minimum the plan shall include but not be limited to the following:
 - (a) continue all operations necessary to maximize degradation of waste constituents within the treatment zone,
 - (b) continue all ground water and unsaturated zone monitoring,
 - (c) continue all operations in the treatment zone to prevent runoff from the site containing waste constituents, and
 - (d) maintain the precipitation and drainage control systems.

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10. In accordance with Section 13263 of the Water Code, these waste discharge requirements are subject to periodic review and revision by this Regional Board.
 11. These requirements do not exempt the discharger from compliance with any other laws, regulations, or ordinances which may be applicable, they do not legalize these land treatment and disposal facilities and they leave unaffected any further restraints on those facilities which may be contained in other statutes or required by other regulatory agencies.
 12. An appropriate Health and Safety Plan for all assessment and mitigation activities at the site shall be filed with this Board prior to commencing any land treatment activities.
- E. The attached Monitoring and Reporting Program is made a requirement of the order.
- F. The Waste Discharge Requirements regulating a specific short term land treatment expire 365 days after the Executive Officer has determined the applicability of this Order to the specific project.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region on October 22, 1990.



ROBERT P. GHIRELLI, D.Env.
Executive Officer

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-10118
FOR
LAND TREATMENT OF PETROLEUM HYDROCARBON CONTAMINATED SOIL
DEFENSE FUEL SUPPORT POINT NORWALK
15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA
(FILE NO. 90-60-146)**

Defense Logistics Agency – Energy (Discharger) shall implement this Monitoring and Reporting Program (MRP), No. CI-10118, at the Defense Fuel Support Point Norwalk (Site) pursuant to Order No. 90-148 (Order) adopted by the Regional Water Quality Control Board, Los Angeles Region (Regional Board), on October 22, 1990.

I. REPORTING REQUIREMENTS

- A. The Discharger shall submit monitoring reports to the Regional Board in a quarterly basis. The first monitoring report under this MRP is due on July 15, 2016. Thereafter, monitoring reports shall be submitted by the date in the following schedule:

<u>Reporting Period</u>	<u>Report Due</u>
January - March	April 15
April - June	July 15
July - September	October 15
October - December	January 15

- B. Within 30 days of completing all post treatment sampling, a "Final Project Completion Report" shall be submitted to the Regional Board verifying that all bioremediation operations at the Site are complete. The report shall include all data collected to date, the quantity and the final disposition of all treated soil, and verify that all cleanup goals have been met. A statement shall be included stating that the land treatment was completed in accordance with the Order. All other signed statements required by under the Order shall also be included.

II. GROUNDWATER MONITORING

The Discharger is currently implementing a Remediation Action Plan (RAP) at the Site that includes soil vapor extraction, groundwater extraction, biosparging, LNAPL removal, and groundwater monitoring under the Regional Board Site Cleanup Program (SCP). Since the proposed bioremediation cells will be lined with high density polyethylene (HDPE) liners and covered with heavy duty plastic sheets, they are not expected to release additional pollutants to groundwater. As such, groundwater monitoring dedicated to the bioremediation cells is not required. Nevertheless, the Discharger may be required to conduct additional groundwater monitoring for the bioremediation project if the Regional Board Executive Officer (Executive Officer) determines that such requirements are warranted.

III. LAND TREATMENT MONITORING

- A. Progress monitoring – Progress samples shall be collected at least monthly following the initiation of bioremediation operations to evaluate the effectiveness of soil treatment. Soil samples shall be collected at a rate of at least one sample per 500 cubic yards (CY) of

soil being treated. Sampling locations shall be determined by subdividing each batch into approximately equal grad cells. One sample shall be collected at a randomly selected location from each grid cell during each successive sampling event. Progress monitoring samples shall be analyzed for the following constituents:

<u>Parameter</u>	<u>Units</u>	<u>Frequency</u>
Bacteria Plate Count	Colonies/gm	Monthly
Soil Moisture Content	%	Monthly
Total Petroleum Hydrocarbons (TPH) (EPA Method 8015)	mg/kg	Monthly

- B. Acceptance sampling – At the end of each treatment cycle, prior to removal from the treatment stockpile, acceptance samples shall be taken at a rate of 35 samples per each treatment stockpile of approximately 750 CY, or at an alternative rate determined under SCP. Sampling locations shall be evenly distributed along the length, width, and depth of each treatment stock pile. All acceptance samples shall be analyzed for the following constituents:

<u>Parameter</u>	<u>Units</u>
Total Petroleum Hydrocarbons (EPA Method 8015)	mg/kg
Volatile Organic Compounds (VOCs, EPA Method 8260B)	µg/kg

The Discharger shall verify that concentrations of all contaminants are below their respective cleanup goals prior removal and reuse treated soil. Treated soil that exceeds cleanup goals shall either be retreated until the cleanup goals are achieved or be properly disposed of offsite. No treated soil shall be reused or backfilled unless all cleanup goals are met.

- C. Post treatment sampling – Following the completion of bioremediation operations, the Discharger shall inspect all liners for any damages that may have resulted in the release of pollutants from the treatment rows to the underline soil. A minimum of three surface samples shall be taken at each treatment row and analyzed for TPH (EPA Method 8015) and VOCs (EPA Method 8260B). Any soil that exceeds cleanup goals shall be excavated and properly disposed of offsite or treated onsite if a treatment cell is still active.
- D. Inspections - Throughout the duration of bioremediation operations, the Discharger shall conduct visual inspections at least weekly at the treatment cells to ensure that all liners, covers, and vapor and moisture control systems are properly maintained. Any damages shall be repaired immediately. Records of such inspections shall be included in the quarterly reports submitted to the Regional Board.

IV. GENERAL PROVISIONS FOR SAMPLING AND ANALYSIS

- A. All sampling, sample preservation, and analysis, shall be performed in accordance with the latest editions of "Guidelines Establishing Test Procedure for Analysis of Pollutants," promulgated by the United States Environmental Protection Agency (U.S. EPA) and U.S. EPA SW-846 Methods (dated December 1996).
- B. All chemical, bacteriological, and bioassay analyses, shall be conducted at a laboratory certified for such analyses by the California Department of Health Services, or approved

by the Executive Officer. No changes shall be made in sampling points without prior approval of the Executive Officer.

- C. Written and verbal notice must be made to the Regional Board a minimum of seven days in advance of the sampling event so that staff may participate, if they choose.
- D. The Discharger shall maintain all sampling and analytical results, including strip charts, date, exact location, and time of sampling, date analysis were performed, name of analyst, analytical techniques used, and results of all analysis. Such results 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.

V. GENERAL PROVISIONS FOR REPORTING

- A. When applicable, all reports shall contain the following minimum information:
 - 1. Quantity of waste material treated during the reporting period;
 - 2. Analytical results from all soil sampling and any groundwater monitoring, if required;
 - 3. Quantity of water and nutrients added to the land treatment units during the report period;
 - 4. Records of bioremediation operations and facility inspections conducted during the report period;
 - 4. A statement certifying that storm water runoff was prevented from entering the land treatment area, other than rainfall directly on the land treatment units, and that no waste material was carried away from the land treatment area by stormwater runoff; and
 - 5. Color photographs of the bioremediation operations shall be taken at least monthly and be included in the quarterly and final reports.
- B. All technical reports prepared for submittal to the Regional Board shall be signed by a California registered Professional Engineer or Professional Geologist.
- C. For every item where requirements in the Order are not met, the Discharger shall submit a statement of the actions undertaken or proposed, together with a timetable, to bring the Discharger back into full compliance with the requirements at the earliest time.
- D. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the data, the constituents, and the concentrations, are readily discernible. The data shall be summarized to determine compliance with waste discharge requirements, and where applicable, shall include receiving groundwater analytical data.
- E. Reports submitted to the Regional Board shall be signed by:
 - 1. In the case of a corporation, the principal executive officer of at least the level of vice president or his duly authorized representative, if such representative is responsible for the overall operation of the facility from which discharge originates;
 - 2. In the case of a partnership, a general partner;
 - 3. In the case of a sole proprietorship, the proprietor;
 - 4. In the case of a municipal, state or public facility, either a principal executive officer, ranking elected officer, or other duly authorized employee.

F. Each report shall contain the following completed declaration:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 fine and imprisonment for knowing violations."

G. Unless it is otherwise required by the Executive Officer, all reports required under this MRP shall be submitted to the State Water Resources Control Board (State Board) Geotracker database system, under Global ID **SLT43185183**, in the form of searchable Portable Document Format (PDF) files. In addition, any groundwater monitoring data shall also be submitted to Geotracker in Electronic Deliverable Format (EDF). A hard copy of the report, including all original laboratory reports and field records that are used in preparation of the reports, shall be retained by the Discharger and be available for review by Regional Board staff.

H. These records and reports are public documents and shall be made available for inspection during 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: April 26, 2016

STANDARD PROVISIONS
APPLICABLE TO WASTE DISCHARGE REQUIREMENTS

1. DUTY TO COMPLY

The discharger must comply with all conditions of these waste discharge requirements. A responsible party has been designated in the Order for this project, and is legally bound to maintain the monitoring program and permit. Violations may result in enforcement actions, including Regional Board orders or court orders requiring corrective action or imposing civil monetary liability, or in modification or revocation of these waste discharge requirements by the Regional Board. (Water Code, Sections 13261, 13263, 13265, 13268, 13300, 13301, 13304, 13340, and 13350). Failure to comply with any waste discharge requirement, monitoring and reporting requirement, or other order or prohibition issued, reissued or amended by the Los Angeles Water Board or State Water Resources Control Board is a violation of these waste discharge requirements and the Water Code, which can result in the imposition of civil liability. (Water Code, Section 13350, subdivision (a).)

2. GENERAL PROHIBITION

Neither the treatment nor the discharge of waste shall create a pollution, contamination or nuisance, as defined by California Water Code section 13050. In addition, the discharge of waste classified as hazardous, as defined in California Code of Regulations, Title 23, Section 2521, subdivision (a) is also prohibited.

3. AVAILABILITY

A copy of these waste discharge requirements shall be maintained at the discharge facility and be available at all times to operating personnel. (Water Code, Section 13263)

4. CHANGE IN OWNERSHIP

The discharger must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this Order's responsibility and coverage to a new discharger containing a specific date for the transfer of this Order's responsibility and coverage between the current discharger and the new discharger. This agreement shall include an acknowledgement that the existing discharger is liable for violations up to the transfer date and that the new discharger is liable from the transfer date forward. (Water Code, Sections 13267 and 13263)

5. CHANGE IN DISCHARGE

In the event of a material change in the character, location, or volume of a discharge, the discharger shall file with this Regional Board a new Report of Waste Discharge. (Water Code, Section 13260, subdivision (c)). A material change includes, but is not limited to, the following:

- (a) Addition of a major industrial waste discharge to a discharge of essentially domestic sewage, or the addition of a new process or product by an industrial facility resulting in a change in the character of the waste.

Standard Provisions Applicable to
Waste Discharge Requirements

- (b) Significant change in disposal method, e.g., change from a land disposal to a direct discharge to water, or change in the method of treatment which would significantly alter the characteristics of the waste.
- (c) Significant change in the disposal area, e.g., moving the discharge to another drainage area, to a different water body, or to a disposal area significantly removed from the original area potentially causing different water quality or nuisance problems.
- (d) Increase in flow beyond that specified in the waste discharge requirements.
- (e) Increase in the area or depth to be used for solid waste disposal beyond that specified in the waste discharge requirements. (California Code of Regulations, Title 23, Section 2210)

6. REVISION

These waste discharge requirements are subject to review and revision by the Regional Board. (Water Code, Sections 13263)

7. NOTIFICATION

Where the discharger becomes aware that it failed to submit any relevant facts in a Report of Waste Discharge or submitted incorrect information in a Report of Waste Discharge or in any report to the Regional Board, it shall promptly submit such facts or information. (Water Code, Sections 13260 and 13267)

8. VESTED RIGHTS

This Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, do not protect the discharger from his liability under Federal, State or local laws, nor do they create a vested right for the discharger to continue the waste discharge. (Water Code, Section 13263, subdivision (g).)

9. SEVERABILITY

Provisions of these waste discharge requirements are severable. If any provisions of these requirements are found invalid, the remainder of the requirements shall not be affected.

10. OPERATION AND MAINTENANCE

The discharger shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the discharger to achieve compliance with conditions of this Order. Proper operation and maintenance includes effective performance, adequate funding, adequate operator

Standard Provisions Applicable to
Waste Discharge Requirements

staffing and training, and adequate laboratory and process controls including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Order. (Water Code, Section 13263, subdivision (f).)

11. NOTIFICATION REQUIREMENT

Except for a discharge which is in compliance with these waste discharge requirements, any person who, without regard to intent or negligence, causes or permits any hazardous substance or sewage to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) that person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State toxic disaster contingency plan adopted pursuant to Article 3.7 (commencing with Section 8574.7) of Chapter 7 of Division 1 of Title 2 of the Government Code, and immediately notify the State Board or the appropriate Regional Board of the discharge. This provision does not require reporting of any discharge of less than a reportable quantity as provided for under subdivisions (f) and (g) of Section 13271 of the Water Code unless the discharger is in violation of a prohibition in the applicable Water Quality Control plan. (Water Code, Section 13271, subdivision (a).)

12. OIL OR PETROLEUM RELEASES

Except for a discharge which is in compliance with these waste discharge requirements, any person who without regard to intent or negligence, causes or permits any oil or petroleum product to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) such person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State oil spill contingency plan adopted pursuant to Article 3.5 (commencing with Section 8574.1) of Chapter 7 of Division 1 of Title 2 of the Government Code. This provision does not require reporting of any discharge of less than 42 gallons unless the discharge is also required to be reported pursuant to Section 311 of the Clean Water Act or the discharge is in violation of a prohibition in the applicable Water Quality Control Plan. (Water Code, Section 13272)

13. INVESTIGATIONS AND INSPECTIONS

The discharger shall allow the Regional Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:

- (a) Enter upon the discharger's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;

Standard Provisions Applicable to
Waste Discharge Requirements

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order, or as otherwise authorized by the California Water Code, any substances or parameters at any location. (Water Code, Section 13267)
- (e) Except for material determined to be confidential in accordance with applicable law, all reports prepared in accordance with the terms of this Order shall be available for public inspection at the office of the Los Angeles Water Board. Data on waste discharges, water quality, geology, and hydrogeology shall not be considered confidential.

14. MONITORING PROGRAM AND DEVICES

The discharger shall furnish, under penalty of perjury, technical monitoring program reports; such reports shall be submitted in accordance with specifications prepared by the Executive Officer, which specifications are subject to periodic revisions as may be warranted. (Water Code, Section 13267)

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. All flow measurement devices shall be calibrated at least once per year, or more frequently, to ensure continued accuracy of the devices. Annually, the discharger shall submit to the Executive Office a written statement, signed by a registered professional engineer, certifying that all flow measurement devices have been calibrated and will reliably achieve the accuracy required.

The analysis of any material required pursuant to Division 7 of the Water Code shall be performed by a laboratory that has accreditation or certification pursuant to Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code. However, this requirement does not apply to field tests, such as test for color, odor, turbidity, pH, temperature, dissolved oxygen, conductivity, and disinfectant residual chlorine. (Water Code, Section 13176). Unless otherwise permitted by the Regional Board Executive officer, all analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board's Division of Drinking Water. All analyses shall be required to be conducted in accordance with the latest edition of "Guidelines Establishing Test Procedures for Analysis of Pollutants" (40CFR Part 136) promulgated by the United States, Environmental Protection Agency (USEPA). (California Code of Regulation, Title 23, Section 2230)

Standard Provisions Applicable to Waste Discharge Requirements

The Quality Assurance-Quality Control Program must conform to the USEPA Guidelines "Laboratory Documentation Requirements for Data Validation", January 1990, USEPA Region 9) or procedures approved by the Los Angeles Regional Water Quality Control Board.

All quality assurance and quality control (QA/QC) analyses must be run on the same dates when samples were actually analyzed. All QA/QC data shall be reported, along with the sample results to which they apply, including the method, equipment, analytical detection and quantitation limits, the percent recovery, and explanation for any recovery that falls outside the QC limits, the results of equipment and method blanks, the results of spiked and surrogate samples, the frequency of quality control analysis, and the name and qualifications of the person(s) performing the analyses. Sample results shall be reported unadjusted for blank results or spike recoveries. In cases where contaminants are detected in QA/QC samples (e.g., field, trip, or lab blanks); the accompanying sample results shall be appropriately flagged.

The Discharger shall make all QA/QC data available for inspection by Regional Board staff and submit the QA/QC documentation with its respective quarterly report. Proper chain of custody procedures must be followed and a copy of that documentation shall be submitted with the quarterly report.

15. TREATMENT FAILURE

In an enforcement action, it shall not be a defense for the discharger that it would have been necessary to halt or to reduce the permitted activity in order to maintain compliance with this Order. Upon reduction, loss, or failure of the treatment facility, the discharger shall, to the extent necessary to maintain compliance with this Order, control production or all discharges, or both, until the facility is restored or an alternative method of treatment is provided. This provision applies, for example, when the primary source of power of the treatment facility fails, is reduced, or is lost. (Water Code, Section 13263, subdivision (f).)

16. DISCHARGE TO NAVIGABLE WATERS

A person who discharges pollutants or proposes to discharge pollutants or proposes to discharge pollutants to the navigable waters of the United States within the jurisdiction of this state or a person who discharges dredged or fill material or proposes to discharge dredged or fill material into the navigable waters of the United States within the jurisdiction of this state shall file a report of waste discharge in compliance with the procedures set forth in Water Code section 13260. (Water Code, Section 13376)

17. ENDANGERMENT TO HEALTH AND ENVIRONMENT

The discharger shall report any noncompliance which may endanger health or the environment. Any such information shall be provided verbally to the Executive Officer within 24 hours from the time the discharger becomes aware of the circumstances. A written submission shall also be provided within five days of the time the discharger becomes aware of the circumstances. The written submission shall contain a

Standard Provisions Applicable to
Waste Discharge Requirements

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 recurrence of the noncompliance. The Executive officer, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours. The following occurrence(s) must be reported to the Executive Office within 24 hours:

- (a) Any bypass from any portion of the treatment facility.
- (b) Any discharge of treated or untreated wastewater resulting from sewer line breaks, obstruction, surcharge or any other circumstances.
- (c) Any treatment plan upset which causes the effluent limitation of this Order to be exceeded. (Water Code, Sections 13263 and 13267)

18. MAINTENANCE OF RECORDS

The discharger shall retain records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies off all reports required by this Order, and record of all data used to complete the application for this Order. Records shall be maintained for a minimum of three years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Board Executive Officer.

Records of monitoring information shall include:

- (a) The date, exact place, and time of sampling or measurement;
 - (b) The individual(s) who performed the sampling or measurement;
 - (c) The date(s) analyses were performed;
 - (d) The individual(s) who performed the analyses;
 - (e) The analytical techniques or method used; and
 - (f) The results of such analyses.
19. (a) All application reports or information to be submitted to the Executive Office shall be signed and certified as follows:
- (1) For a corporation – by a principal executive officer or at least the level of vice president.
 - (2) For a partnership or sole proprietorship – by a general partner or the proprietor, respectively.

Standard Provisions Applicable to
Waste Discharge Requirements

- (3) For a municipality, state, federal, or other public agency – by either a principal executive officer or ranking elected official.
- (b) A duly authorized representative of a person designated in paragraph (a) of this provision may sign documents if:
 - (1) The authorization is made in writing by a person described in paragraph (a) of this provision.
 - (2) The authorization specifies either an individual or position having responsibility for the overall operation of the regulated facility or activity; and
 - (3) The written authorization is submitted to the Executive Officer.

Any person signing a document under this Section shall make the following certification:

“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 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. (Water Code Sections 13263, 13267, and 13268)”

20. OPERATOR CERTIFICATION

Supervisors and operators of municipal wastewater treatment plants and privately owned facilities regulated by the Public Utilities Commission, used in the treatment or reclamation of sewage and industrial waste shall possess a certificate of appropriate grade in accordance with California Code of Regulations, title 23, section 3680. State Boards may accept experience in lieu of qualification training. (California Code of Regulations, Title, 23, Sections 3680 and 3680.2.) In lieu of a properly certified wastewater treatment plant operator, the State Board may approve use of a water treatment plant operator of appropriate grade certified by the State Department of Public Health where reclamation is involved. (California Code of Regulations, Title, 23, Section 3670.1, subdivision (b).)

ADDITIONAL PROVISIONS APPLICABLE TO
PUBLICLY OWNED TREATMENT WORKS' ADEQUATE CAPACITY

21. Whenever a regional board finds that a publicly owned wastewater treatment plant will reach capacity within four years, the board shall notify the discharger. Such notification shall inform the discharger that the regional board will consider adopting a time schedule order pursuant to Section 13300 of the Water Code or other enforcement order unless

Standard Provisions Applicable to Waste Discharge Requirements

the discharger can demonstrate that adequate steps are being taken to address the capacity problem. The notification shall require the discharger to submit a technical report to the regional board within 120 days showing how flow volumes will be prevented from exceeding existing capacity or how capacity will be increased. A copy of such notification shall be sent to appropriate local elected officials, local permitting agencies and the press. The time for filing the required technical report may be extended by the regional board. An extension of 30 days may be granted by the executive officer. Longer extensions may be granted by the regional board itself. (California Code of Regulations, Title, 23, Section 2232.)

Los Angeles Regional Water Quality Control Board

July 12, 2012

Mr. Matthew Young
Defense Logistics Agency Energy
8725 John J. Klingman Road, Suite 2941
Fort Belvoir, VA 22060-6222

SUBJECT: REVIEW OF PROPOSED SOIL CLEANUP GOALS

SITE: DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (SCP NO. 0286A, SITE ID NO. 16638)

Dear Mr. Young:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) has received and reviewed your March 14, 2012, *Justification for Calculations of the Proposed Soil Cleanup Goals and Revised Tables*, prepared by Parsons on your behalf for the above referenced site (site).

Proposed soil cleanup goals for chemicals of concern (COCs) were calculated using the procedures prescribed in the Regional Board's May 1996, *Interim Site Assessment & Cleanup Guidebook* (Guidebook). Petroleum fuel hydrocarbons and BTEX (benzene, toluene, ethylbenzene and xylenes) compounds were calculated in compliance with Table 4-1 of the Guidebook. The following table lists the proposed soil cleanup goals for COCs:

Proposed Soil Cleanup Goals

Depth Below Ground Surface	(feet below ground surface)					
	0.5	5	10	15	20	25
Depth to Groundwater	25.5	21	16	11	6	1
Constituent	Proposed Soil Cleanup Goal (mg/kg)					
TPH as Gasoline (C4-C12)	500	500	100	100	100	100
TPH as JP-5 (C8-C17)	500	500	100	100	100	100
TPH as Diesel (C5-C25)	1,000	1,000	100	100	100	100
Benzene	0.015	0.013	0.012	0.013	0.011	0.012
Toluene	0.614	0.440	0.391	0.423	0.356	0.367
Ethylbenzene	2.07	1.44	1.19	1.33	1.07	1.10
Xylenes	5.55	3.77	3.09	3.47	2.76	2.84
1,1,2,2-Tetrachloroethane	0.0023	0.0020	0.0015	0.0012	0.0006	0.0002
1,1,2-Trichloroethane	0.0032	0.0029	0.0023	0.0020	0.0012	0.0008
1,2,3-Trichlorobenzene	0.0740	0.0634	0.0467	0.0356	0.0162	0.0034

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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

Depth Below Ground Surface	(feet below ground surface)					
	0.5	5	10	15	20	25
Depth to Groundwater	25.5	21	16	11	6	1
Constituent	Proposed Soil Cleanup Goal (mg/kg)					
1,2,3-Trichloropropane	8.74E-07	7.66E-07	5.87E-07	4.79E-07	2.56E-07	1.23E-07
1,2,4-Trimethylbenzene	2.10	1.80	1.34	1.03	0.478	0.120
1,2-Dibromo-3-chloropropane	2.50E-04	2.19E-04	1.68E-04	1.37E-04	7.31E-05	3.52E-05
1,2-Dibromoethane	3.05E-06	2.78E-06	2.27E-06	2.04E-06	1.30E-06	9.60E-07
1,2-Dichloroethane	1.06E-04	1.04E-04	9.37E-05	9.60E-05	7.29E-05	6.92E-05
1,3,5-Trimethylbenzene	2.06	1.77	1.31	1.01	0.470	0.118
2-Butanone	0.557	0.607	0.617	0.713	0.612	0.661
2-Chlorotoluene	0.558	0.481	0.358	0.278	0.132	0.039
2-Hexanone	0.0073	0.0072	0.0065	0.0066	0.0050	0.0047
4-Chlorotoluene	0.547	0.472	0.351	0.273	0.130	0.038
Acetone	0.994	1.17	1.28	1.57	1.42	1.60
Bromomethane	0.0015	0.0014	0.0013	0.0013	0.0010	0.0010
Carbon disulfide	0.049	0.046	0.039	0.038	0.026	0.023
Chlorobenzene	0.119	0.104	0.079	0.063	0.032	0.013
Chloroethane (Ethyl Chloride)	2.23	2.47	2.55	2.98	2.59	2.83
Chloroform	7.38E-05	6.82E-05	5.67E-05	5.25E-05	3.48E-05	2.75E-05
Dichlorodifluoromethane	0.984	0.868	0.672	0.559	0.309	0.167
Diisopropyl Ether (DIPE)	0.449	0.424	0.364	0.350	0.246	0.212
Isopropylbenzene	5.56	4.78	3.53	2.71	1.26	0.303
Methylene Chloride	7.78E-04	7.99E-04	7.61E-04	8.27E-04	6.69E-04	6.82E-04
Methyl-t-Butyl Ether (MTBE)	9.07E-04	9.10E-04	8.43E-04	8.89E-04	6.97E-04	6.86E-04
Naphthalene	0.270	0.231	0.170	0.130	0.059	0.012
n-Butylbenzene	3.97	3.40	2.50	1.91	0.867	0.179
n-Propylbenzene	2.18	1.87	1.39	1.06	0.489	0.114
p-Isopropyltoluene	2.82	2.42	1.79	1.37	0.636	0.154
sec-Butylbenzene	2.59	2.22	1.64	1.26	0.576	0.129
Styrene	0.463	0.399	0.296	0.229	0.108	0.030
Tert-Butyl Alcohol (TBA)	0.0010	0.0012	0.0013	0.0016	0.0014	0.0016
tert-Butylbenzene	2.07	1.78	1.32	1.01	0.465	0.110
Trichloroethene	0.0070	0.0061	0.0047	0.0038	0.0020	0.0009

mg/kg = milligram per kilogram

The Guidebook specifies that the soil cleanup goals are calculated by the same general formula as the US EPA Soil Screening Levels, which is as follows:

$$\text{soil cleanup goal} = \text{total attenuation factor} \times \text{water quality standards}$$

The proposed water quality standards used to calculate the soil cleanup goals were most conservative of sources from 1) California drinking water Maximum Contaminant Levels, 2) California drinking water

Notification Levels, and 3) US EPA Tapwater Regional Screening Levels. Site-specific soil parameters including thickness of the clay, sand, and silt layers were used to calculate for specific depth.

We have reviewed the proposed soil cleanup goals and concur with the goals for COCs at the site, based on information provided in your March 14, 2012 report.

If you have any questions, please contact Mr. Paul Cho at (213) 576-6721 (pcho@waterboards.ca.gov).

Sincerely,



Paul Cho, P.G.
Engineering Geologist
Site Cleanup Unit III

cc: Congresswoman Grace Napolitano, 1609 Longworth Building, Washington, D.C. 20515
Mr. Benjamin Cardenas (benjamin.cardenas@mail.house.gov)
Ms. Evelyn Herrera (evelyn.herrera@mail.house.gov)
Mr. Mike Egan, City of Norwalk (megan@ci.norwalk.ca.us)
Mr. Thomas Lynch, City of Norwalk (tlynch@ci.norwalk.ca.us)
Ms. Adriana Figueroa, City of Norwalk (afigueroa@ci.norwalk.ca.us)
Mr. Steve Harari, Department of Toxic Substances Control (shariri@dtsc.ca.gov)
Mr. Redwan Hassan, Parsons (Redwan.hassan@parsons.com)
Ms. Mary Lucas, Parsons (mary.lucas@parsons.com)
Ms. Mary McIntosh, Norwalk Restoration Advisory Board (Maryjanemc13@aol.com)
Mr. Steve Defibaugh, Kinder Morgan Energy Partners (Steve_Defibaugh@kindermorgan.com)
Mr. Daniel Jablonski, CH2MHILL (Daniel.Jablonski@CH2M.com)
Mr. Norman Dupont, Richards Watson Gershon (ndupont@rwglaw.com)

Los Angeles Regional Water Quality Control Board

July 16, 2015

Mr. Nicholas Carros
DLA Installation Support – Energy
8725 John J. Klingman Road
Fort Belvoir, VA 22060

SUBJECT: APPROVAL OF MODIFICATION TO THE SOIL CLEANUP GOALS

CASE/SITE: DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (SCP NO. 0286A, SITE ID NO. 16638)

Dear Mr. Carros:

On July 9, 2015, the California Regional Water Quality Control Board (Regional Board) received a technical document titled *Proposed Addendum to the Soil Cleanup Goals* (Addendum), prepared by The Source Group, Inc. (SGI), on behalf of Defense Logistics Agency (DLA), for the above referenced site (Site). This Addendum proposes a modification of soil cleanup goals for total petroleum hydrocarbons (TPH).

On July 12, 2012, Regional Board approved soil cleanup goals for chemicals of concern, including TPH as gasoline (C₄-C₁₂), TPH as JP-5 (C₈-C₁₇), and TPH as diesel (C₅-C₂₅), after review of the technical document titled *Justification for Calculations of the Proposed Soil Cleanup Goals and Revised Tables*, dated March 14, 2012 and prepared by Parsons. However, DLA and SGI proposes TPH soil cleanup goal modification to include longer chain hydrocarbons (C₂₅ and greater). The modified goals are based on this Regional Board's 1996 *Interim Site Assessment and Cleanup Guidebook*. The following table lists the modified soil cleanup goals for TPH:

Depth Below Ground Surface	(feet below ground surface)					
	0.5	5	10	15	20	25
Depth to Groundwater	25.5	21	16	11	6	1
TPH	Modified Soil Cleanup Goal (milligram per kilogram)					
Carbon Range C ₄ -C ₁₂	500	500	100	100	100	100
Carbon Range C ₁₃ -C ₂₂	1,000	1,000	100	100	100	100
Carbon Range C ₂₃ -C ₄₄	10,000	10,000	1,000	1,000	1,000	1,000

Mr. Nicholas Carros
Defense Logistics Agency Energy

- 2 -

July 16, 2015

Based on our review, we concur with the modified soil cleanup goals for TPH. If you have any questions, please contact me at (213) 576-6721 (paul.cho@waterboards.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Paul Cho".

Paul Cho, P.G.
Engineering Geologist
Site Cleanup Unit V

cc: See Mail List

Mail List

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