



Los Angeles Regional Water Quality Control Board

February 18, 2020

1353 Western LLC
Attn: Matthew Winefield
1417 Via Anita
Pacific Palisades, CA 90272

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 0700 0001 9921 0211

REVISED MONITORING AND REPORTING PROGRAM

**FORMER GAS-TO-GO FACILITY
1353 NORTH WESTERN AVENUE, LOS ANGELES
(CASE NO. 900270243) (GLOBAL ID NO. T0603742795)
(ORDER NO. R4-2014-0187, SERIES NO. 118, CI NO. 10400)**

Dear Mr. Winefield:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within Los Angeles and Ventura Counties. As such, the Regional Board is the lead regulatory agency for overseeing corrective action (assessment and/or monitoring activities) and cleanup of releases from leaking underground storage tank (UST) systems at the subject site (Site).

The Former Gas-to-Go facility (Site) is located at 1353 North Western Avenue, in Los Angeles, California (Figure 1). On May 15, 2018, the Regional Board enrolled 1353 Western LLC (Discharger) under General Waste Discharge Requirements (WDR) Order No. R4-2014-0187, Series 118, and Monitoring and Reporting Program (MRP) CI-10400. General WDR Order No. R4-2014-0187 was adopted by this Regional Board on September 11, 2014. However, the proposed in-situ chemical oxidation (ISCO) has not been implemented to date.

On December 15, 2019, JAG Consulting Group, Inc. (JAG) submitted the document "Work Plan for ISCO Pilot Test" (Remedial Action Plan [RAP]) on behalf of the Discharger, with the document "Revision to Work Plan for ISCO Pilot Test" (RAP Addendum) dated January 9, 2020 also submitted. The RAP and RAP Addendum proposed injections of stabilized hydrogen peroxide and sodium persulfate into five borings near monitoring wells MW-1R and MW-8U to remediate tertiary butyl alcohol (TBA) in groundwater. The RAP and RAP Addendum proposed the same chemical injectants, at a different location.

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

February 18, 2020

Regional Board staff have determined that the proposed discharge modification meets the conditions specified in General WDR Order No. R4-2014-0187. You shall implement revised MRP No. CI-10400 (attached). Should changes to the discharge be needed, revised engineering calculations and drawings, showing the changes, must be filed with the Regional Board a minimum of 30 days prior to the changes. The Discharger must receive approval from the Regional Board for such changes prior to implementation.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the WDR and MRP, including groundwater monitoring data, discharge location data, portable document format (PDF) copies of monitoring reports, and progress reports on the status of the project to the State Water Resources Control Board GeoTracker database under Global ID WDR100040064.

Please see Electronic Submittal for GeoTracker Users, dated December 12, 2011, at: <https://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%20Users.pdf>.

If you have any questions, please contact Dr. Eric Wu at (213) 576-6683 or by email at eric.wu@waterboards.ca.gov for issues regarding the WDRs and Mr. Dave Bjostad at (213) 576-6712 or by email at dave.bjostad@waterboards.ca.gov for issues regarding the USTs.

Sincerely,



Renee Purdy
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-10400

copy by e-mail:

Brian Partington, Water Replenishment District of Southern California
Eloy Luna, City of Los Angeles Fire Department, Underground Storage Tanks
Royce Long, City of Los Angeles Fire Department, CUPA Manager
Karl Bowers, The Source Group/Apex Companies, LLC

copy by mail (w/o attachments):

Covenant House of California, 1325 N. Western Ave., Los Angeles, CA 90027

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-10400

FOR

**1353 WESTERN LLC
FORMER GAS-TO-GO
1353 WESTERN AVENUE NORTH, LOS ANGELES
(IN-SITU CHEMICAL OXIDATION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2014-0187, SERIES NO. 118)**

I. REPORTING REQUIREMENTS

- A. 1353 Western LLC (hereinafter Discharger) shall implement this monitoring program on the effective date of this Monitoring and Reporting Program (MRP). A pilot test report is due **May 15, 2020**. The first monitoring report under this MRP, for the period from January 2020 to June 2020, shall be received at the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Regional Board) by **July 15, 2020**. Subsequent monitoring reports shall be received at the Los Angeles Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January – June	July 15th
July – December	January 15th

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP to the State Water Resources Control Board (State Board) GeoTracker database, Attention: Information Technology Unit.

If there is no discharge or injection during any reporting period, the report shall so state.

- B. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Board Division of Drinking Water - Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.
- C. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Los Angeles Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed

for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Los Angeles Regional Board.

- D. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Los Angeles Regional Board staff.
- E. Each monitoring report must affirm in writing “All analyses were conducted at a laboratory certified for such analyses by the State Board ELAP and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program.” Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- F. Each monitoring report shall contain a separate section titled “Summary of Non-Compliance” which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with Waste Discharge Requirements (WDR). This section shall be located at the front of the report and shall clearly list all non-compliance with WDR, as well as all excursions of effluent limitations.
- G. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Los Angeles Regional Board.
- H. If the Discharger performs analyses on any groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.
- I. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.
- J. The Discharger should not implement any changes to the MRP prior to receiving Executive Officer's written approval.
- K. In accordance with regulations adopted by the State Board regarding electronic submittal of information, UST monitoring reports have been electronically submitted to the State Board GeoTracker database under the UST Global ID T0603742795. To comply with the MRP under this WDR, the Discharger shall

upload the WDRs monitoring reports to the GeoTracker database under both Global ID Nos. T0603742795 and WDR100040064.

II. IN-SITU CHEMICAL OXIDATION (ISCO) INJECTION MONITORING REQUIREMENTS

The semi-annual reports shall contain the following information regarding injection activities:

1. Groundwater monitoring wells shall not be used as injection points to avoid reduction of the groundwater monitoring network, data bias, well screen clogging and alteration. Separate injection points must be installed for the proposed chemical oxidation injections.
2. A location map showing placement locations used for the chemical oxidation injections (refer to attached Figure 1 for site map).
3. Written and tabular summary defining the quantity of hydrogen peroxide, sodium persulfate, and sodium citrate injected to the groundwater and a summary describing the days on which the injection system was in operation.

Constituent	Units	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS ¹
Hydrogen peroxide, sodium persulfate, and sodium citrate delivered per location	Gallons and Concentration	--	Semi-Annually

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. The Executive Officer may change the monitoring program at any time during remediation. Groundwater samples shall be collected, at a minimum, from MW-1R and MW-8U in the injection area (Figure 1), UZ-1 (approximately 20 feet west), UZ-2 (approximately 30 feet east), and LZ-8 (approximately 75 feet southwest downgradient, in the lower groundwater zone) (Figure 2) on a semi-annual schedule to monitor the effectiveness of the in-situ groundwater remediation. Groundwater monitoring parameters for the pilot test were proposed in the RAP, which the Regional Board approved January 30, 2020. Groundwater shall be monitored for the duration of the remediation in accordance with the following monitoring program:

Constituent	Units	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS ¹
Total petroleum hydrocarbons as gasoline (TPHg)	µg/L ³	Grab	Semi-Annually
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	Semi-Annually
Naphthalene, Ethanol Formaldehyde, Acetone	µg/L	Grab	Semi-Annually
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), Ethyl tertiary butyl ether (ETBE)	µg/L	Grab	Semi-Annually
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L ⁴	Grab	Semi-Annually
Oxidation-reduction potential (ORP)	Millivolts	Grab	Semi-Annually
Dissolved Oxygen	µg/L	Grab	Semi-Annually
Dissolved Ferrous Iron	µg/L	Grab	Semi-Annually
Total Chromium and Hexavalent Chromium ²	µg/L	Grab	Semi-Annually
pH	pH units	Grab	Semi-Annually
Temperature	°F/°C	Grab	Semi-Annually
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	Semi-Annually

¹ One week before injection and semi-annually thereafter.

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

³ µg/L = microgram per liter.

⁴ mg/L = milligram per liter.

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

- a. Well identification, date and time of sampling.
- b. Sampler identification, and laboratory identification.
- c. Semi-annual observation of groundwater levels, recorded to 0.01 feet mean sea level, and calculated groundwater flow direction.

IV. MONITORING FREQUENCIES

Specifications in the MRP are subject to periodic revisions. Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Executive Officer if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the _____ day of _____ at _____

_____ (Signature) _____ (Title)"

VI. PUBLIC DOCUMENTS

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the Los Angeles Regional Board, upon request by interested parties.

Ordered by:



Renee Purdy
Executive Officer

Date: February 18, 2020