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## Los Angeles Regional Water Quality Control Board

February 18, 2020

Mr. Andy Bell  
Dudecuzzi LLC  
7 Giralda Walk  
Long Beach, CA 90803

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO: 7016 2710 0000 2564 7604

### **GENERAL WASTE DISCHARGE REQUIREMENTS FOR IN-SITU GROUNDWATER REMEDiation GROUNDWATER RE-INJECTION**

**DUDECUZZI LLC (FORMER PEDRO BRAS AND FORMER TEXACO)  
1365 OBISPO AVENUE, LONG BEACH, CALIFORNIA  
(ORDER NO. R4-2014-0187, SERIES NO. 150, CI NO. 10531, UST CASE NO.  
908040170, GLOBAL ID NO. WDR100046028)**

Dear Mr. Bell:

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 the Los Angeles and Ventura counties. As such, the Los Angeles Regional Board is the lead regulatory agency for overseeing corrective actions (assessment and/or monitoring activities) and cleanup of releases from leaking underground storage tank (UST) systems at the subject site (Site). Pursuant to Health and Safety Code section 25296.10, Dudecuzzi LLC is required to take corrective action (i.e., Preliminary Site Assessment, Soil and Water Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety, and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), title 23, sections 2720 through 2727.

We have received your Remedial Action Plan dated July 24, 2019, prepared by your consultant SCS Engineers to address the elevated level of benzene in groundwater monitoring well MW-6 (Figure-5). Your consultant SCS Engineers is proposing to implement in situ treatment with injection of Oxygen Release Compound (ORC®) along with Sodium Persulfate (PersulfOx), into the upper five feet of the aquifer at 22 locations to promote biological degradation in the area surrounding groundwater monitoring well MW-6. The first round of treatment will consist of two applications, each approximately four weeks apart. In situ treatment during the second round of treatment would include the oxygen releasing substance ORC® advanced along with PersulfOx.

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

To-date, a total of 16 groundwater monitoring wells have been installed onsite and offsite. During the most recent groundwater sampling analysis event conducted on June 26, 2019, depth to groundwater ranged between 33.46 and 35.56 feet below ground surface (bgs) and groundwater gradient was toward the south. Total petroleum hydrocarbons as gasoline (TPH-g) was detected in groundwater at maximum concentrations of 12.1 mg/L (MW-12) and benzene was detected in groundwater at maximum concentrations of 10,600 µg/L (MW-6).

The Site consists of an approximately 1.13-acre paved lot and contains two large warehouse type buildings, one to the east and one to the west, and one small building near the southeast corner. On April 6, 1992, one 12,000-gallon gasoline UST was removed from the site. Sampling following the UST removal indicated elevated levels of petroleum hydrocarbons in soil and groundwater. In addition, free product was detected beneath the Site. Free product removal was conducted on a weekly basis from December 2000 through July 2002. It is estimated that approximately 7,300 gallons of groundwater and free product were removed by these activities. High-vacuum dual phase extraction was intermittently conducted in 2003 and 2004. It is estimated that approximately 40,546 pounds of petroleum hydrocarbons were removed from the subsurface during these activities. Also, groundwater pumping in 2007, removed an estimated 3,500 gallons of petroleum hydrocarbons impacted groundwater. An air sparge/soil vapor extraction system was installed and operated at the Site from December 2005 through October 2007. A total of 5,575 pounds of fuel related volatile organic compounds (VOCs) were removed by the system during this time period. Moreover, between August 2008 and December 2010, approximately 250,000 gallons of groundwater were removed. Previous investigations conducted at the site have included UST system piping and dispenser replacement, site investigations to characterize the extent of petroleum hydrocarbons in soil and groundwater, periodic groundwater monitoring, and SVE feasibility testing.

Enclosed are your Waste Discharge Requirements, consisting of the General WDRs R4-2014-0187 and Monitoring and Reporting Program No. CI-10531, Series No. 150.

When submitting technical monitoring reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-10531, Series No. 150, which will assure that the reports are directed to the appropriate file and staff. Do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

In accordance with regulations adopted by the State Board in September 2004, regarding electronic submittal of information, UST monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0603701750. To comply with the modified Monitoring and Reporting Program under this WDRs, you shall upload the WDRs monitoring reports to the Geotracker under the two Global ID T0603701750 (continuing) and WDR10046028 (new).

Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You are responsible for the full annual fee if your

request for termination is made after the beginning of the new fiscal year beginning July 1. When your project has been completed and the permit is no longer needed, please submit a written request for termination of your enrollment under the general permit in a separate letter to avoid paying future annual fees.

If you have any questions, please contact the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 ([eric.wu@waterboards.ca.gov](mailto:eric.wu@waterboards.ca.gov)). Questions regarding underground storage tank issues should be forwarded to Mr. Ahmad Lamaa at (213) 576-6716, or email at [alamaa@waterboards.ca.gov](mailto:alamaa@waterboards.ca.gov).

Sincerely,



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Renee Purdy  
Executive Officer

Enclosures: General Waste Discharge Requirements Order No. R4-2014-0187  
Standard Provisions, Applicable to Waste Discharge Requirements  
Monitoring and Reporting Program No CI-10531

CC: Brian Partington, Water Replenishment District of Southern California  
Lusi Mkhitarian, Los Angeles County Department of Health Services  
Thomas Dong, SCS Engineers

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

**MONITORING AND REPORTING PROGRAM NO. CI-10531**

**FOR**

**DUDECUZZI LLC (PEDRO BRAS, FORMER TEXACO)  
1365 OBISPO AVENUE, LONG BEACH  
(ORC ALONG WITH PERSULFOX INJECTION FOR GROUNDWATER CLEANUP)**

**ENROLLMENT UNDER REGIONAL BOARD  
(ORDER NO. R4-2014-0187, SERIES NO. 150)**

**I. REPORTING REQUIREMENTS**

- A. Dudecuzzi LLC (hereinafter Discharger) shall implement this monitoring program on the effective date of this Monitoring and Reporting Program (MRP). The first monitoring report under this program shall be received at the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) by July 15, 2020. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

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

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 (SWRCB) GeoTracker database.

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 Water Quality Control Board (State Board) 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.

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 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 Regional Board.

- C. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 Code of Federal Regulation Part 136. All QA/QC samples must be run on the dates when samples are actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request from the Regional Board staff.
- D. Each monitoring report must affirm in writing that "All analyses are conducted at a laboratory certified for such analyses by the State Board ELAP, and in accordance with current United States Environmental Protection Agency guideline procedures, or as specified in this MRP." Proper chain of custody procedure must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- E. Each monitoring report shall contain a separate section entitled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that are needed to bring the discharge into full compliance with Waste Discharge Requirements (WDRs). This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.
- F. 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 Regional Board.
- G. If the Discharger performs analyses on groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.

- H. 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.
- I. The Discharger should not implement any changes to the MRP prior to receiving the Executive Officer's written approval.
- J. In accordance with regulations adopted by the State Board in September 2004 regarding electronic submittal of information, Underground Storage Tank Program (UST) monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0603701750. To comply with the MRP under this WDRs, the Discharger shall upload the WDRs monitoring reports to the Geotracker under the two Global ID T0603701750 (continuing) and WDR100046028 (new).

II. OXYGEN RELEASE COMPOUND (ORC) ADVANCED AND SODIUM PERSULFATE (PERSULFOX) INJECTION MONITORING REQUIREMENTS

The reports shall contain the following information regarding injection activities:

- 1. Location map showing application area.
- 2. Written summary defining:
  - Location of injection points and depth to groundwater;
  - Quantity of ORC and Persulfox per area; and
  - Total amount of ORC and Persulfox applied at site.
- 3. Groundwater monitoring wells shall not be used as ORC and Persulfox injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging, and alteration.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site to monitor the effectiveness and ensure no adverse impacts associated with the ORC and Persulfox application at treatment area. Groundwater samples shall be collected from groundwater monitoring wells MW-1, MW-4, MW-6 and MW-8 through MW-13 (See Figures 3, 4 and 5). A baseline monitoring and sampling shall be

Monitoring and Reporting Program CI-10531

conducted prior to the proposed ORC and Persulfox application. Baseline monitoring will establish the initial conditions with respect to the contaminant levels. The Discharger shall conduct baseline sampling one or two weeks prior to ORC and Persulfox application and regular sampling with the required frequencies from the monitoring wells for the following constituents:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS <sup>1</sup>
Total petroleum hydrocarbons as gasoline (TPH-g) and as diesel (TPH-d)	µg/L	Grab	• Semi-Annually
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	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), Naphthalene	µg/L	Grab	• Semi-Annually
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually
Oxidation-reduction potential	milivolts	Grab	• Semi-Annually
Dissolved Oxygen	µg/L	Grab	• Semi-Annually
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually
Total Chromium and hexavalent chromium <sup>2</sup>	µg/L	Grab	• Semi-Annually
pH	pH units	Grab	• Semi-Annually
Temperature	<sup>0</sup> F/ <sup>0</sup> C	Grab	• Semi-Annually

Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually
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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-annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored semi-annually thereafter.

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 groundwater flow direction.

#### IV. MONITORING FREQUENCIES

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

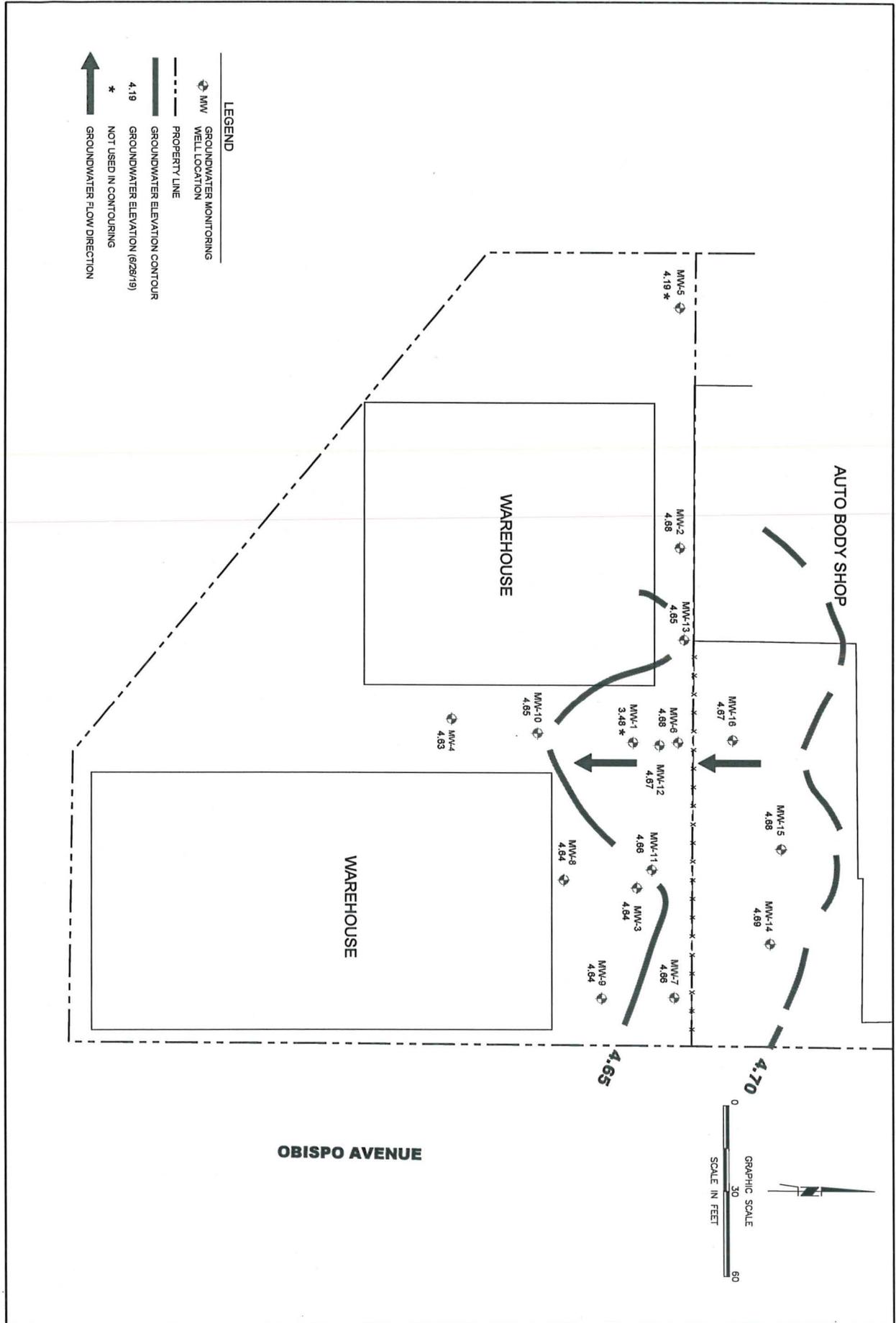
These records and reports are public documents and shall be made available for inspection during normal business hours at the Regional Board.

Ordered by:



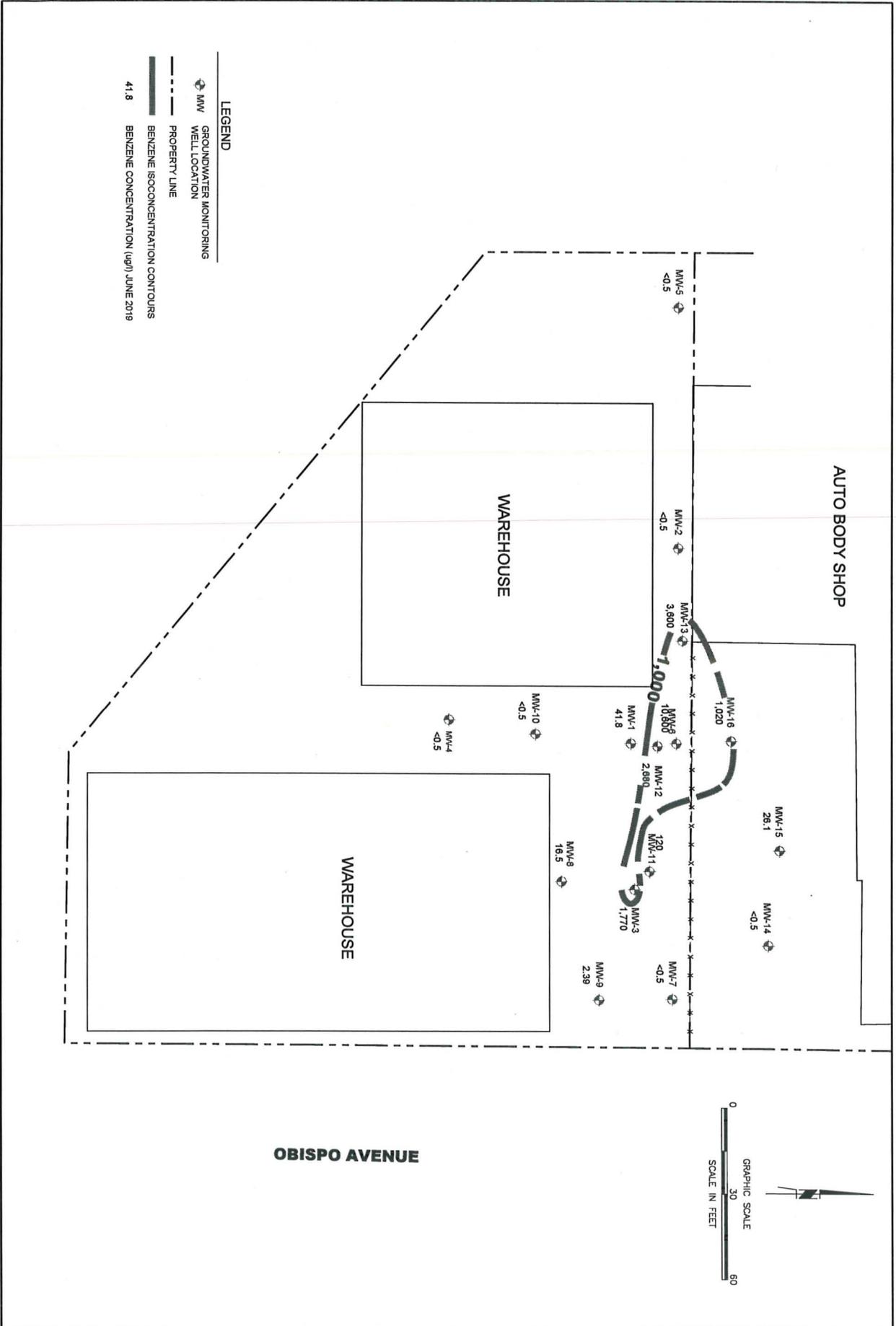
\_\_\_\_\_  
Renee Purdy  
Executive Officer

Date: February 18, 2020

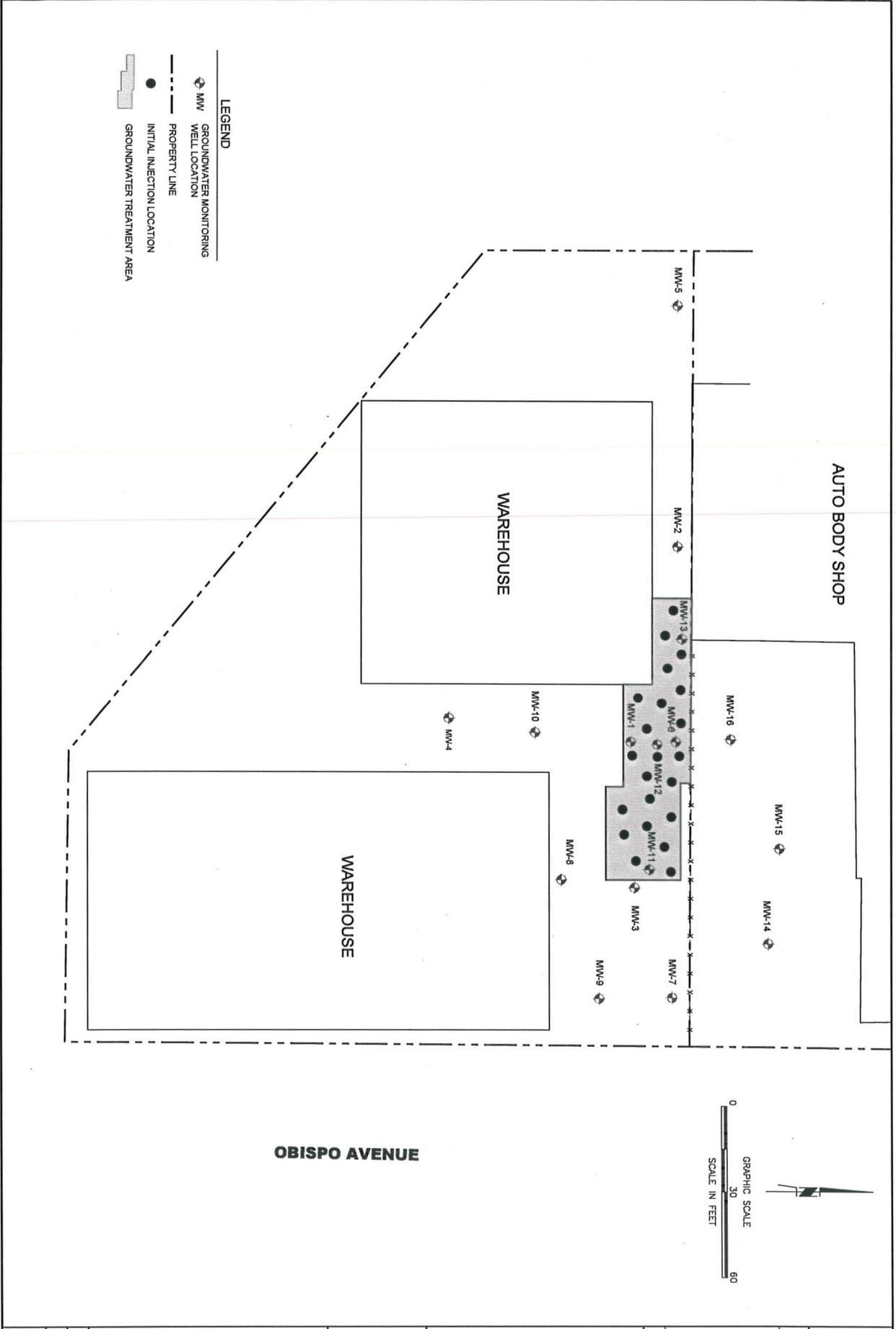


<b>SCS ENGINEERS</b> <b>ENVIRONMENTAL CONSULTANTS</b> 3252 KELBOY AIRPORT WAY, SUITE 100 LONG BEACH, CA 90802 PH: (562) 428-9244 FAX: (562) 427-0805	SHEET TITLE GROUNDWATER ELEVATION CONTOURS, JUNE 2019	NO.	REVISION	DATE
	PROJECT TITLE 1365 OBISPO AVENUE LONG BEACH, CA 90804	NO.	REVISION	DATE
PROJECT NO. 01219150.00 DRAWN BY R. RAMIREZ CHECKED BY K. LISTER DATE 07-18-19 SCALE 1"=30'	SCALE	SCALE	SCALE	SCALE

FIGURE 3



<b>SCS ENGINEERS</b> ENVIRONMENTAL CONSULTANTS 3500 KILGORY AIRPORT WAY, SUITE 100 LONG BEACH, CA 90805 PH (562) 438-3544 FAX (562) 437-0805	SHEET TITLE: GROUNDWATER BENZENE CONCENTRATIONS, JUNE 2019		NO.	REVISION	DATE
	PROJECT TITLE: 1365 OBISPO AVENUE LONG BEACH, CA 90804		▲		
PROJ NO: 01219150.00 DATE: 07-18-19 SCALE: 1"=50' DRAWING NO: FIGURE 4	DESIGNED BY: R. RAMIREZ CHECKED BY: K. LISTER	DRAWN BY: K. LISTER CHECKED BY: K. LISTER	▲		



<b>SCS ENGINEERS</b> <b>ENVIRONMENTAL CONSULTANTS</b> 3500 KILROY AIRPORT WAY, SUITE 100 LONG BEACH, CA 90802 PH: (562) 428-2544 FAX: (562) 427-0805	PROJECT NO: 01219150.00	DATE: 07-18-19	SCALE: 1"=30'	DRAWING NO: FIGURE 5	SHEET TITLE: SITE MAP WITH PROPOSED GROUNDWATER TREATMENT AREA	PROJECT TITLE: 1365 OBISPO AVENUE LONG BEACH, CA 90804	<table border="1"> <thead> <tr> <th>NO.</th> <th>REVISION</th> <th>DATE</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	NO.	REVISION	DATE																											
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