

California R Jional Water Quality (Introl Board

Los Angeles Region



Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

Agency Secretary 320 W. 4th Stree

320 W. 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles Arnold Schwarzenegger Governor

April 14, 2006

Ms. Angelita Delago Wells Fargo Bank-Private Banking 444 South Flower Street, Suite # 1360 Los Angeles, CA 90017

Dear Ms. Delago:

GENERAL WASTE DISCHARGE REQUIREMENTS FOR OXYGEN RELEASE COMPOUND (ORC) INJECTION FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL AND/OR VOLATILE ORGANIC COMPOUND IMPACTED SITES – POWER RATED/FRANCIOSI TRUST, 11750 EAST IMPERIAL HIGHWAY, NORWALK (FILE NO. 906500025, USTCF NO. 14217) (ORDER NO. R4-2005-0030, SERIES NO. 039; CI NO. 9056)

We have completed our review of your application for coverage under General Waste Discharge Requirements to inject non-hazardous Oxygen Release Compound (ORC) at the site referenced above in Norwalk, California for groundwater cleanup and remediation.

In 1987, three 10,000-gallon gasoline underground storage tanks (USTs) were removed from the subject site. Various subsurface investigations and remediation activities have been conducted at the subject site following the USTs removal, which consisted of drilling and sampling fourteen soil borings, operating a soil vapor extraction unit, and installing three vadose zone extraction wells. A total of twelve groundwater monitoring wells have been installed at the site between 1993 and 2001 to fully characterize the groundwater contaminant plume. Groundwater monitoring conducted had indicated high levels of TPH-gasoline, benzene and MTBE (historically up to 62,000 μ g/L; 8,300 μ g/L and 1,000 μ g/L respectively).

Between December 1993 and November 1996, soil vapor extraction was operated at the site. Analytical results for monthly vapor monitoring samples indicated that concentrations of hydrocarbon vapor in soil had been reduced to a point of diminishing returns. A letter dated January 17, 1997 from this Regional Water Quality Control Board granted closure with regard to the hydrocarbon-impacted soil beneath the site. However, in light of the results of groundwater monitoring and sampling results, groundwater closure could not be granted. In addition, quarterly groundwater monitoring and sampling was initiated in the first quarter of 1997, and have been performed on a quarterly basis since then.

A letter dated January 14, 2003, from this Regional Water Quality Control Board approved an Interim Remedial Action Plan to inject Oxygen Release Compound (ORC) in the up-gradient wells to remediate groundwater beneath the subject site. ORC is used to enhance intrinsic bioremediaition involving the addition of oxygen to the subsurface environment to accelerate the natural degradation process. The remedial objectives for the site are to reduce BTEX and MTBE concentrations in groundwater. Your consultant, Advanced GeoEnvironmental Inc., has

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evaluated the use of ORC for remediation of groundwater at the site and plans the injection of ORC in the up-gradient monitoring wells MW-13, MW-14, and MW-16.

Regional Board staff has determined that the proposed discharge meets the conditions specified in Order No. R4-2005-0030, "Revised General Waste Discharge Requirements for Groundwater Remediation At Petroleum Hydrocarbon Fuel and/or Volatile Organic Compound Impacted Sites (General WDRs)," adopted by the State Water Resources Control Board on April 19, 2005.

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2005-0030 and Monitoring and Reporting Program No. CI-9056 and Standard Provisions.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment (April 14, 2006) under Regional Board Order No. R4-2005-All monitoring reports shall be sent to the Regional Board, ATTN: Information 0030. Technology Unit.

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9056, 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.

We are sending a copy of Order No. R4-2005-0030 only to the applicant. A copy of the Order will be furnished to anyone who requests it, or on line at : http://www.waterboards.ca.gov/losangeles/html/permits/gen orders/R4-2005-0030/R4-2005-0030.pdf

If you have any questions, please contact Mr. Rod Nelson at (213) 576-6119.

Sincerely,

Bachnaushi, AEO Jonathan S. Bishop

Executive Officer

Enclosures: 1. Board Order No. 2005-0030

2. Monitoring and Reporting Program No. CI-9056

cc:

Mr. Tim Smith, Los Angeles County Department of Public Works, Environmental Programs Division

Mr. Joshua Ong, Advanved GeoEnvironmental, Inc.

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