



# California Regional Water Quality Control Board

## Los Angeles Region



Alan C. Lloyd, Ph.D.  
Agency Secretary

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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)**

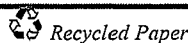
We have completed our review of your application for coverage under General Waste Discharge Requirements to inject non-hazardous Oxygen Release Compound (ORC) at the site referenced above in Norwalk, California for groundwater cleanup and remediation.

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 µg/L; 8,300 µg/L and 1,000 µg/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 bioremediation 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

**California Environmental Protection Agency**



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

Ms. Angelita Delago  
Wells Fargo Bank-Private Banking

- 2 -

April 14, 2006

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. R4-2005-0030. All monitoring reports shall be sent to the Regional Board, ATTN: Information 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](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.

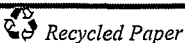
Sincerely,

*fw* *Daniel A. Bachauski, AEO*  
Jonathan S. Bishop  
Executive Officer

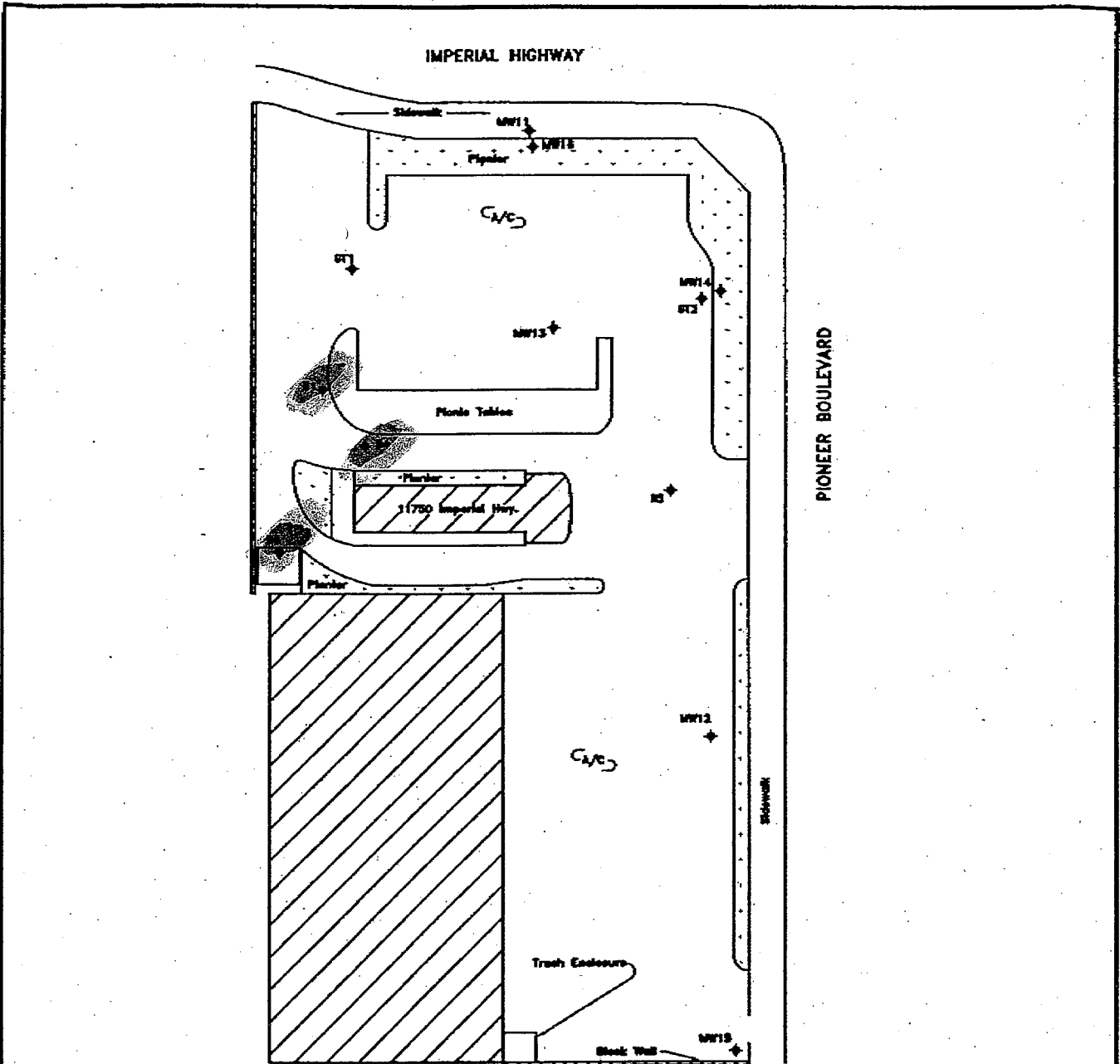
Enclosures: 1. Board Order No. 2005-0030  
2. Monitoring and Reporting Program No. CI-9056

cc: Mr. Tim Smith, Los Angeles County Department of Public Works, Environmental Programs Division  
Mr. Joshua Ong, Advanved GeoEnvironmental, Inc.

**California Environmental Protection Agency**

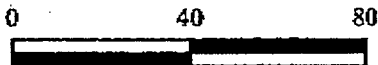


*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*



**LEGEND:**

-  Existing Building
-  MW14 Ground Water Monitoring Well Location



SCALE IN FEET

**Advanced**  
  
**GeoEnvironmental, Inc.**

**ORC INJECTION POINTS**  
**Franciosi Trust**  
 11750 Imperial Highway  
 Norwalk, California

Project No.:  
 LA 736H1.327  
 Date:  
 13 April 2006

MICHAEL BERRY, P.E., A.C.E.  
 5/22/87 8:00 PM

**STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
MONITORING AND REPORTING PROGRAM NO. CI- 9056  
FOR  
POWER RATED/FRANCIOSI TRUST  
(OXYGEN RELEASE COMPOUND INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4-2005-0030, SERIES NO. 039, FILE NO. 906500025, USTCF NO. 14217)**

**I. REPORTING REQUIREMENTS**

- A. Power Rated/Francioci Trust (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2005-0030. The first monitoring report under this program, for April -June 2006, shall be received at the Regional Board by July 15, 2006. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

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

- B. If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.
- C. By March 1<sup>st</sup> of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall explain the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements (WDRs).
- D. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services 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.

April 14, 2006

- E. 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.
- F. 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 Regional Board staff.
- G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, 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.
- H. 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 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.
- I. 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.
- J. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.
- K. 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.

II. OXYGEN RELEASE COMPOUND (ORC) INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the ORC.
2. Written and tabular summary defining the quantity of ORC injected per month 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
Total ORC delivered per injection point	grams/day	--	<ul style="list-style-type: none"> <li>• Quarterly</li> </ul>

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall continue to conduct quarterly groundwater monitoring at the site. Groundwater samples shall be collected from existing up-gradient groundwater monitoring wells MW-13, MW14 and MW-16, and down-gradient groundwater monitoring well MW-15 on a quarterly basis to monitor the effectiveness of the ORC remediation. ORC injection points shall not be used as monitoring points. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS <sup>1</sup>	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>

Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), Formaldehyde, Acetates, Ethyl tertiary butyl ether (ETBE)	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Ethanol Formaldehyde Acetone	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Total dissolved solids Chloride Sulfate	mg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Oxidation-reduction potential	millivolts		<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Dissolved Oxygen	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Dissolved ferrous iron	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Total Chromium and chromium six <sup>2</sup>	µg/L	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>

PH	pH units	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Temperature	<sup>0</sup> F/ <sup>0</sup> C	Grab	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	<ul style="list-style-type: none"> <li>• 1 week before injection</li> <li>• Bi-weekly for the first month following injection</li> <li>• Monthly for the next 3 months</li> <li>• Quarterly thereafter</li> </ul>

<sup>1</sup> µg/l - micrograms per liter

<sup>2</sup> The Discharger is required to monitor for total chromium and chromium six only when they are detected in the baseline test.

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. Quarterly 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

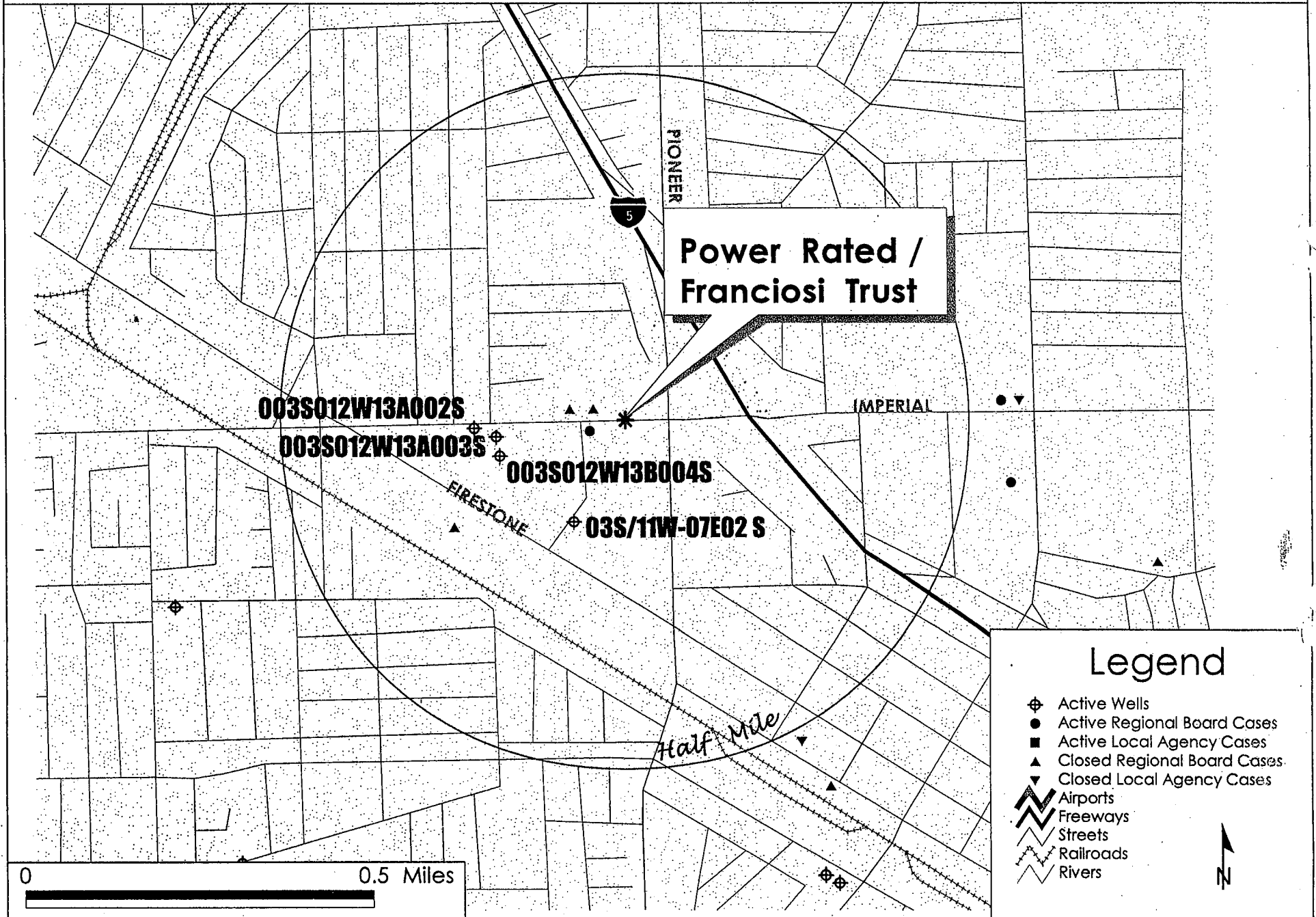
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

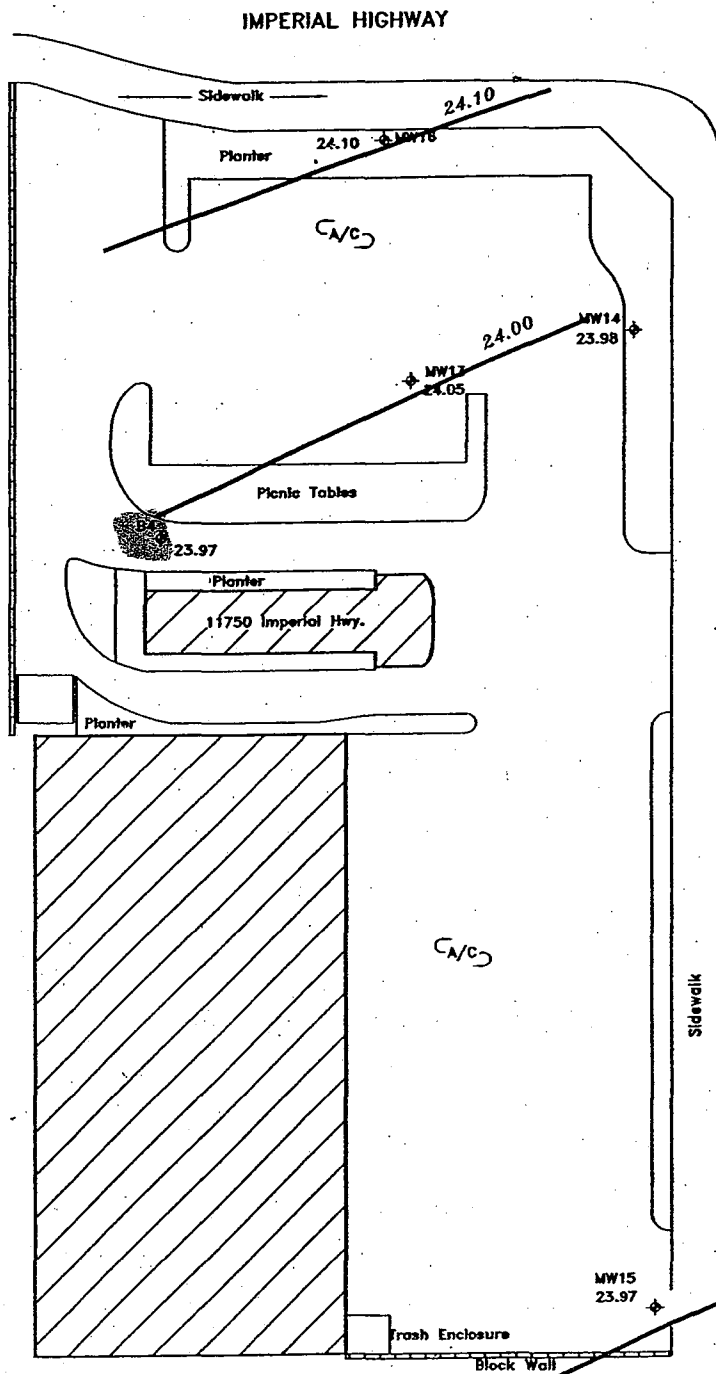
Ordered by: Jonathan S. Bishop, AEO  
Jonathan S. Bishop  
Executive Officer

Date: April 14, 2006

11750 E Imperial Hwy

Norwalk, CA 90650





**LEGEND:**



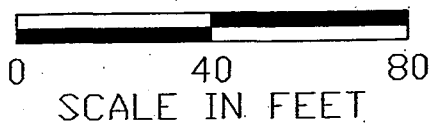
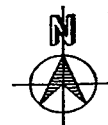
Existing Building



MW14  
23.98  
Ground Water Monitoring Well Location  
With Ground Water Elevation in Feet



-24.00-  
Ground Water Contour (Feet)



*Advanced*  
GeoEnvironmental, Inc.



**- SITE PLAN WITH  
GROUND WATER CONTOURS**

Franciosi Trust  
11750 Imperial Hwy.  
Norwalk, California

Project No.:

LA736H1.327

Date:

11 August 2005