



FILE 0388

California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

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

March 5, 2009

Ms. Lanita Stevens
USG Corporation
125 South Franklin Street
Chicago, IL 60606-4678

APPROVAL OF CHANGE IN INJECTION APPROACH PURSUANT TO GENERAL WASTE DISCHARGE REQUIREMENTS PERMIT NO. R4-2005-0030 – US GYPSUM FACILITY, 14370 GANNET STREET, LA MIRADA, CALIFORNIA (FILE NO. 2041700, SCP NO. 0388, MONITORING AND REPORTING PROGRAM NO. CI-9176)

Dear Ms. Stevens:

We approved your proposal to pump potassium permanganate-laden groundwater from wells KMN-1, GTI-1, BH-21, and EW-13 and re-injecting the pumped material into wells OS-4, GTI-2, GTI-4, and MW-2 in a letter dated February 17, 2009. We have reviewed a March 3, 2009, e-mailed request (Work Plan) from your consultant, Mr. Gary Cronk of JAG Consulting Group, Inc. to modify the injection approach.

PROPOSED WORK

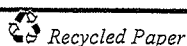
According to your new request, no material will be pumped from wells KMN-1, GTI-1, BH-1, and EW-13. Instead, it was proposed that fresh batches of 3 percent potassium permanganate solution would be injected into wells OS-4, GTI-2, GTI-4, and MW-2. The injection wells, along with notable recently-detected volatile organic compound (VOC) concentrations in groundwater from those wells, are provided in the following table:

Proposed Injection Well	Notable VOC Concentration at Injection Well
OS-4	310 µg/L TCE
GTI-2	91 µg/L TCE
GTI-4	220 µg/L 1,1-DCE
MW-2	250 µg/L TCE

Each well would receive approximately 300 to 500 pounds of potassium permanganate solution. The rationale for this new approach is summarized as:

1. The new approach is cheaper and less labor intensive than the pump-and-re-inject approach that was previously proposed and approved, resulting in fewer site visits being required; and

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.

2. The use of fresh potassium permanganate injectant should provide greater assurance that effective treatment will be achieved compared to re-injecting permanganate from a previous injection event that has been partially consumed and which is of an unknown concentration.

COMMENTS AND REQUIREMENTS

Based upon a review of the Work Plan and other documents in our file, you are authorized to implement the proposed work with the following comments and conditions:

1. This Work Plan approval is an amendment to General WDR Permit no. R4-2005-0030.
2. Prepare a report documenting the injection of fresh potassium permanganate. Include a description of the methodology used for injection and the actual volume injected into each well. This report is due by **June 30, 2009**, as per the original February 17, 2009 Order.
3. This approval assumes that the previously-approved pumping and re-injection of permanganate-laden groundwater will not be performed. You are not authorized to perform both the pumping and re-injection of permanganate-laden groundwater and the injection of fresh potassium permanganate solution into wells OS-4, GTI-2, GTI-4, and MW-2.
4. Notify Regional Board staff at least five working days prior to performing the injection work.

Should you have any questions related to this project, please contact Mr. Greg Bishop at (213) 576-6727, or the undersigned at (213) 576-6803, or you can send us e-mails to: gbishop@waterboards.ca.gov or doriola@waterboards.ca.gov.

Sincerely,



Dixon A. Oriola, Unit Chief
Site Cleanup Program Unit II

cc: Mr. Gary Cronk, JAG Consulting Group, Inc.