

## California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful



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Arıld Schwarzenegger Governor

April 3, 2007

Ms. Stacey Jentzsch P. O. Box 461 Shady Cove, OR 97539

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER REMEDIATION AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND ANI/OR HEXAVALENT CHROMIUM IMPACTED SITES MOTOR DOCTORS - 195 SOUTH ROBERTSON BOULEVARD, BEVERLY HILLS (ID# I-11080) (UST CLEANUP FUND #3508) (CI NO. 9247) (R4-2007-0019; SERIES NO. 012)

Dear Ms. Jentzsch:

We have received your application for coverage under General Waste Discharge Requirements to inject Fenton's Reagent to enhance chemical oxidation and aerobic degradation of dissolved phase petroleum hydrocarbons and fuel oxygenates in the shallow groundwater.

Motor Doctors (hereinafter Discharger) operated an automobile service station at 195 South Robertson Boulevard, Beverly Hills, California (Site) (Figure 1) (Latitude: 34<sup>0</sup> 03' 54", Longltude: 118<sup>0</sup> 23' 02"). The Site consisted of two 8,000-gallon underground storage tanks (USTs) and one 1,000-gallon waste oil UST. The USTs were removed in December 1987.

Subsurface site assessments following the removal of USTs found the soil and groundwater were contaminated with fuel hydrocarbons. A quarterly groundwater monitoring program has been implemented since 1992. A various configurations of soil vapor extraction/ air sparging (SVE/AS) systems have been operating on various schedules since 2000 and have removed approximately 1,007 pounds of gasoline. The most recent monitoring data indicated that maximum total petroleum hydrocarbon as gasoline (TPH<sub>G</sub>) concentration at 26,600  $\mu$ g/L, benzene concentration at 3,370  $\mu$ g/L and methyl tertiary butyl ether (MTBE) concentration at 127  $\mu$ g/L were detected.

A Revised Action Plan (RAP), dated October 9, 2006, prepared by Advanced Environmental Concepts, Inc (AEC), was approved by the Regional Board on November 13, 2006.

AEC proposes a two-phase approach to address the groundwater contamination. The first phase will be to conduct a pilot study on-site. AEC proposes to inject Fenton's Reagent into 23 locations spread across two separate areas. The two areas will be approximately 900 square feet each and centered around GW-2 and GW-3 (Area 1) and GW-4, and GW-5 (Area 2) (Figure 2). Injection spacing depends on site conditions and will be determined in the field. Based on the results of the pilot study, the second phase of the remedial action will address the offsite groundwater contamination.

Existing or future groundwater monitoring wells shall not be used as injection points for application of remediation chemicals, in order to avoid reduction of groundwater monitoring network data bias, well screen clogging and alternation.

Upon completion of the first phase onsite injection, the discharger shall submit a Remedial Action Plan for the second phase in-situ remediation of offsite groundwater contamination. The Executive Officer will review and approve new sampling locations for the second phase injection.

We have reviewed the information provided and have determined that the proposed injection meets the conditions specified in Regional Board Order No. R4-2007-0019, "Revised General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Sites," adopted by this Regional Board on March 1, 2007.

Enclosed are Waste Discharge Requirements consisting of Regional Board Order No. R4-2007-0019, and Monitoring and Reporting Program No. CI-9247 and Standard Provisions. The "Monitoring and Reporting Program" requires you to implement the monitoring program on the effective date of this enrollment (April 3, 2007) under Regional Board Order No. R4-2007-0019. All monitoring reports should be sent to the Regional Board, <u>ATTN: Information Technology Unit.</u>

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to "Compliance File No. CI-9247," which will assure that the reports are directed to the appropriate file and staff. Also, please 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. R4-2007-0019 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/R4-2007-0019/R4-2007-0019.pdf

If you have any questions concerning this matter, please call Mr. Rodney Nelson at (213) 620-6119.

Sincerely,

Jonathan S. Bishop Executive Officer

Enclosures:

- 1. Board Order No. R4-2007-0019
- 2. Monitoring and Reporting Program No. CI-9247

Cc: Ms. Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank Cleanup Fund

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

Mr. John Buck, Advanced Environmental Concepts Inc.

Mr. Lyle Gerber, Beverly Hills Unified School District

Mr. David Akhamzadeh

## California Environmental Protection Agency