California Regional Water Quality Control Board
Los Angeles Region

Linda S. Adams
Secretary for Environmental Protection

320 West Fourth 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

June 30, 2009

Mr. Lee Hanley
ExxonMobil Oil Company
1464 Madera Road, Suite N. #265
Simi Valley, CA 93065

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES—FORMER EXXONMOBIL 18KED, 2305 BORCHARD ROAD, NEWBURY PARK (ORDER NO. R4-2007-0019; CI NO. 9519)

Dear Mr. Hanley:

We have completed our review of your application for coverage under the General Waste Discharge Requirements to inject Fenton's Reagent at the site referenced above for groundwater cleanup and remediation.

In 1983, the underground storage tanks were removed and replaced and a total of 44 truckloads of hydrocarbon-containing soil were excavated. Multiple phases of assessment have been conducted at the site since then, which included the installation of 14 soil borings, 13 groundwater monitoring wells. Results of the pre-remediation assessment activities indicated that the maximum TPHg and benzene concentrations in groundwater were 606, and 227 μg/L, respectively as reported in second quarter 2008.

From 1983 to 1984, a total of 435 gallons of NAPL were recovered from beneath the subject site. From August 1996 to May 1997, a soil vapor extraction and groundwater pump was in operation and a total of 958 pounds of hydrocarbons were extracted and oxidized. Groundwater pump-and-treat system was operated from November 1996 to May 1997, extracting a total of 5.5 millions gallons of groundwater.

Due to the persistent dissolved phase benzene concentration measured for well MW01 at one to two orders of magnitude in excess of the MCL, the Discharger's consultant, Environmental Resolutions, Inc. (ERI), proposed in the "Work Plan for Feasibility Testing" (Workplan) dated December 18, 2008, and "Work Plan Addendum for Feasibility Testing" dated March 13, 2009 to inject Fenton's Reagent into groundwater formation through four direct push hydro-punch locations.

A letter dated March 30, 2009, from the Ventura County Division of Environmental Health (VCDEH) approved the Workplan and its addendum.

Regional Board staff has determined that the proposed discharge meets the conditions specified in Order No. R4-2007-0019, "*Revised General Waste Discharge Requirements for Groundwater Remediation At*

Order No. R4-2007-0019 June 30, 2009
Monitoring & Reporting Program No. CI-9519

Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Sites (General WDRs)," adopted by the Los Angeles Regional Water quality Control Board on March 1, 2007.

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019 and Monitoring and Reporting Program No. CI-9516 and Standard Provisions. This Waste Discharge Requirements shall not be terminated without the regulatory oversight agency's prior approval.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2007-0019. 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-9519, 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.

To avoid paying future annual fees, please submit written request for termination of your enrollment under the general permit in a separate letter when your project has been completed and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

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/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf

If you have any questions, please contact Dr. Rebecca Chou at (213) 620-6156 for WDRs administration matters, or Mr. Gregg Kwey at (213) 576-6702 for technical matters.

Sincerely,

Tracy J. Egoscue
Executive Officer

Enclosures: 1. Board Order No. R4-2007-0019
2. Standard Provisions for Reporting and Monitoring
3. Monitoring and Reporting Program No. CI-9519

cc: Mr. David Salter, Ventura County Division of Environmental Health
Mr. James Anderson, ERI

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

MONITORING AND REPORTING PROGRAM NO. CI-9519

FOR

EXXONMOBIL OIL CORPORATION
FORMER EXXONMOBIL 18KED
2305 BORCHARD ROAD, NEWBURY PARK

(FENTON'S REAGENT INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 096)

I. REPORTING REQUIREMENTS

A. ExxonMobil Oil Corporation (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for July to December 2009, shall be received at the Regional Board by January 15, 2010. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due
January – June	July 15
July – December	January 15

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.

B. By March 1st 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).

C. 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.

D. 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.

E. 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.

F. 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.

G. 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.

H. 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.

I. 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.

J. 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.

K. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. FENTON'S REAGENT INJECTION MONITORING REQUIREMENTS

The Semi-Annually reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the Fenton's Reagent injection. Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration. Four injection points are currently proposed to be installed in the center of groundwater plumes that can be referenced in Plate 2. Additional injection points should be reviewed and approved by the County of Ventura, Environmental Health Division (VCEHD) and Regional Board prior to full scale implementation.

2. Written and tabular summary defining the quantity of Fenton's Reagent injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from two source area monitoring wells MW01 and DM10, and two down-gradient monitoring wells MW04 and MW05 on a Semi-Annually basis to monitor the effectiveness of the in-situ groundwater remediation. Additional monitoring wells for full scale implementation may be required if VCEHD and Regional Board deemed they are necessary. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	• Semi-Annually[1]
Benzene, Toluene, Ehylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-Annually[1]
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Semi-Annually[1]
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually[1]
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate,	mg/L	Grab	• Semi-Annually[1]

Lead, Nickel, Cadmium, Manganese			
Oxidation-reduction potential	milivolts		• Semi-Annually[1]
Dissolved Oxygen	µg/L	Grab	• Semi-Annually[1]
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually[1]
Total Chromium and chromium six [2]	µg/L	Grab	• Semi-Annually[1]
PH	pH units	Grab	• Semi-Annually[1]
Temperature	$^0F/^0C$	Grab	• Semi-Annually[1]
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually[1]

[1] One week before injection and Semi-Annually thereafter

[2] The Discharger is required to monitor for total chromium and chromium six 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-Annually 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)

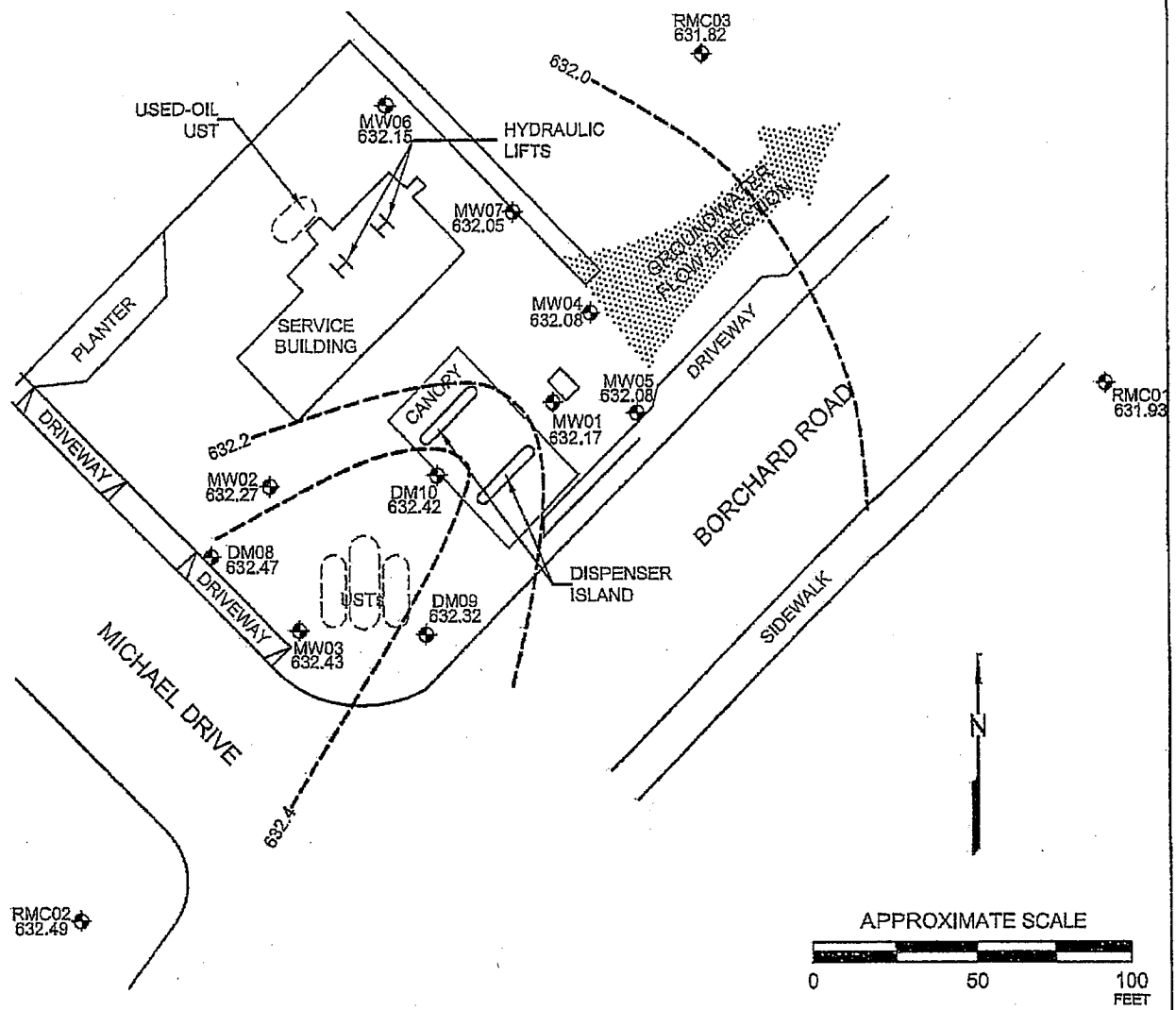
_____(Title)"

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: _____
Tracy J. Egoscue
Executive Officer

Date: June 30, 2009



FN 10230002

EXPLANATION

⊕ MW07	Groundwater monitoring well
632.49	Groundwater elevation (feet, relative to mean sea level)
------	Line of equal groundwater elevation

ERI
EARTH QUALITY RESOURCES

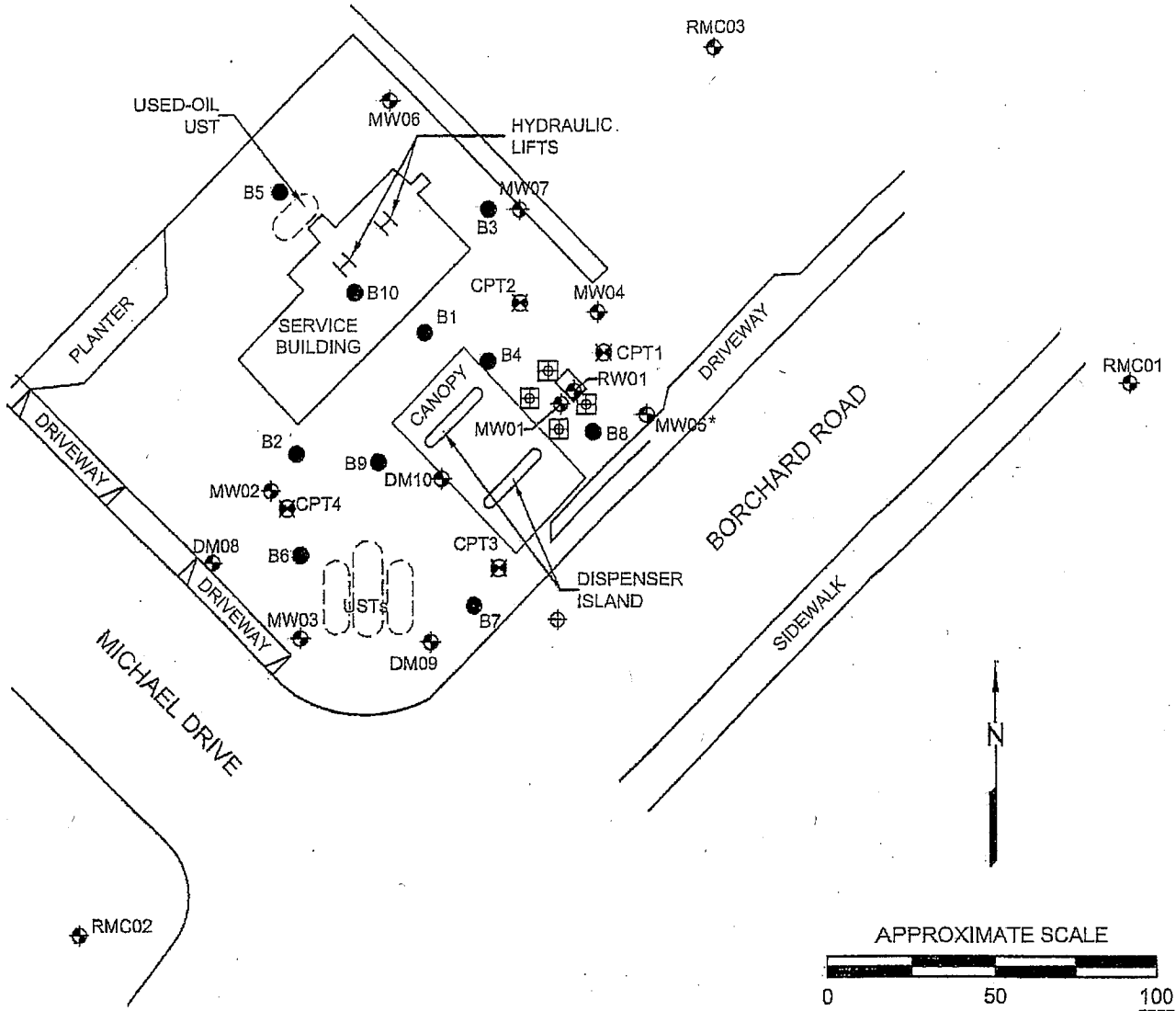
GROUNDWATER ELEVATION CONTOUR MAP – 06/19–20/08

FORMER EXXONMOBIL STATION 18KED
2305 Borchard Road
Newbury Park, California

PROJECT NO.
1023

PLATE
3

DATE: 08/28/08



SOURCE:
Modified from a map
provided by
Holguin, Fahan & Associates, Inc.

FN 10230002

EXPLANATION

⊕	MW07 Groundwater monitoring well	⊕	Proposed groundwater monitoring well
⊠	CPT4 Cone penetration test boring	*	Proposed reincorporation into groundwater sampling program
●	B10 Soil boring location	⊞	Proposed direct-push injection location

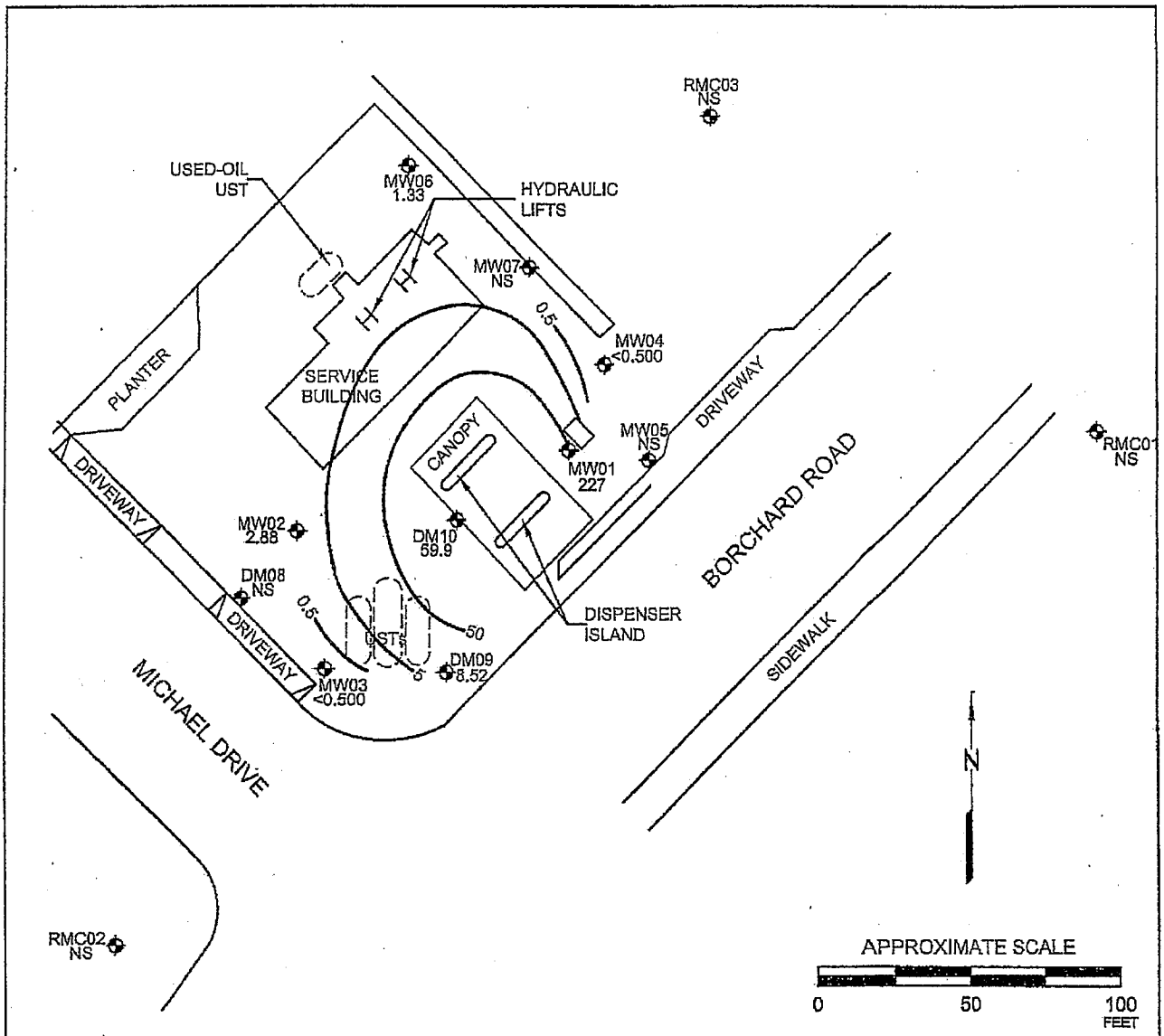
GENERALIZED SITE PLAN

FORMER EXXONMOBIL STATION 18KED
2305 Borchard Road
Newbury Park, California

PROJECT NO. 1023

PLATE 2

DATE: 12/12/08



FN 10230002

EXPLANATION

◆ MW07	Groundwater monitoring well
227	Benzene concentration in micrograms per liter
<0.500	Less than the stated laboratory reporting limit
NS	Not sampled
———	Line of equal benzene concentration

ERI

BENZENE GROUNDWATER ISOPLETH CONCENTRATION MAP – 06/19–20/08

FORMER EXXONMOBIL STATION 18KED
2305 Borchard Road
Newbury Park, California

PROJECT NO.
1023

PLATE
9

DATE: 08/28/08