

# 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/iosangeles

Arnold Schwarzenegger
Governor

June 21, 2010

Mr. Fred Hancz Power Gas Company 12000 Culver Boulevard Culver City, CA 90066

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES POWER GAS SERVICE STATION 12000 CULVER BOULEVARD, LOS ANGELES, CALIFORNIA (I.D. 900660189)(CUFID #16331) (ORDER NO. R4-2007-0019, SERIES NO. 130; CI NO. 9610)

Dear Mr. Hancz:

We have completed our review of the application for coverage under the General Waste Discharge Requirements to sparge ozone at the site referenced above in Los Angeles, California, for groundwater cleanup and remediation.

Power Gas service station is an active facility for dispensing gasoline in Los Angeles, California (Site). The site currently maintains four underground storage tanks (USTs), a dispenser island and associated product lines.

Your consultant, the Reynolds Group (TRG) performed soil and groundwater cleanup at the site by operating a dual vapor extraction system (DPE) and removed approximately 52,148 pounds of petroleum hydrocarbons from 2007 to October 2009. The analytical data from the latest groundwater monitoring event conducted in April 2010 indicated groundwater beneath the site was impacted by TPHg (up to 991,463 µg/L), benzene (up to 17,623 µg/L), methyl tertiary butyl ether (MTBE) (up to 304,146 µg/L) and TBA (up to 75,169 µg/L). In addition to the DPE cleanup, TRG proposed to enhance cleanup by adding ozone-sparging technique. TRG submitted a Remedial Action Plan (RAP) addendum to clean up the groundwater contamination on April 21, 2010. An ozone-sparing pilot testing will be performed for three months to obtain parameters for a full scale system to reduce the contaminant concentrations in groundwater. One additional monitoring well GP-1 will be installed between sparging wells AS1 and AS2. A full-scale ozone-sparging system will be installed after pilot testing. The RAP was approved by Regional Board staff on June 7, 2010.

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 Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Sites (General WDRs)," adopted by the Los Angeles Regional Water Quality

California Environmental Protection Agency

Mr. Fred Hancz Power Gas Company

Control Board on March 1, 2007. This Waste Discharge Requirements shall not be terminated without the regulatory oversight agency's prior approval.

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019 and Monitoring and Reporting Program No. CI-9610 and Standard Provisions.

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, <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-9610, 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.

You are required to submit all laboratory data from groundwater monitoring over the Internet in the Electronic Deliverable Format to the State Water Resources Control Board's GeoTracker database.

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: <a href="http://www.waterboards.ca.gov/losangeles/html/permits/gen\_orders/R4-2007-0019/R4-2007-0019.pdf">http://www.waterboards.ca.gov/losangeles/html/permits/gen\_orders/R4-2007-0019/R4-2007-0019.pdf</a>

If you have any questions, please contact Dr. Rebecca Chou at (213) 576-6119 or send her an email at <a href="mailto:rchou@waterboards.ca.gov">rchou@waterboards.ca.gov</a> for administrative issues and Mr. Jay C. Huang at (213) 576-6711 or send him an email at <a href="mailto:jhuang@waterboards.ca.gov">jhuang@waterboards.ca.gov</a> for technical issues.

Sincerely,

Samuel Unger, P.E.

Interim Executive Officer

Enclosures: 1. Board Order No. R4-2007-0019

2. Monitoring and Reporting Program No. CI-9610

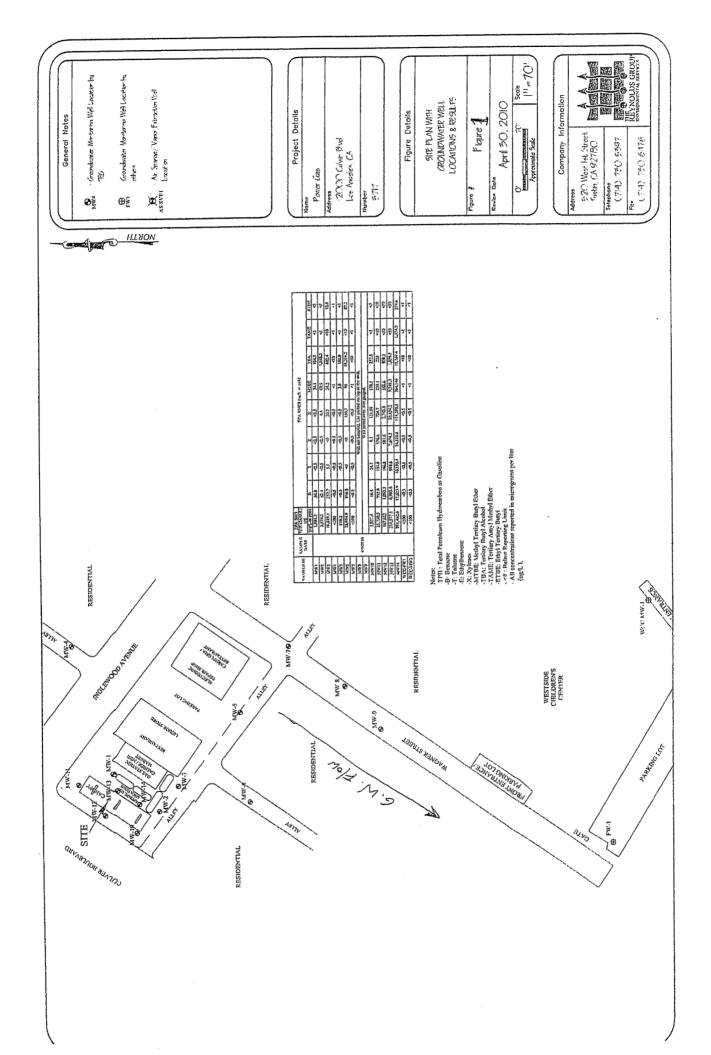
cc: Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank
Cleanup Fund

California Environmental Protection Agency

Mr. Fred Hancz Power Gas Company

Tim Smith, Los Angeles County Department of Public Works, Environmental Programs Nancy Matsumoto, Water replenishment District of Southern California Danny Nunuz, The Reynolds Group

California Environmental Protection Agency



# STATE OF CALIFORNIA CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION MONITORING AND REPORTING PROGRAM NO. CI-9610

POWER GAS COMPANY 12000 CULVER BOULEVARD, LOS ANGELES (OZONE INJECTION FOR GROUNDWATER CLEANUP) (ORDER NO. R4-2007-0019, SERIES NO. 130)

#### REPORTING REQUIREMENTS

A. Power Gas Company (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-December 2010, shall be received at the Regional Board by January 15, 2011. 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

Monitoring reports must be addressed to the regional Board, Attention: Information Technology Unit.

- B. If there is no discharge or injection during any reporting period, the report shall so state.
- C. By January 30 of each year, beginning January 30, 2012, 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.
- 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. OZONE INJECTION MONITORING REQUIREMENTS

The semi-annual reports shall contain the following information regarding injection activities:

- 1. Location map showing injection points used for the ozone injection.
- 2. Written and tabular summary defining the quantity of ozone injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

- 3. Semi-annual visual inspection at each injection point shall be conducted to evaluate the well casing integrity for a period of three month after each injection. The quarterly report shall include a summary of the visual inspection.
- 4. To avoid groundwater monitoring network reduction, data bias, and well screen clogging or alteration, no groundwater monitoring wells shall be used as injection points during the proposed ozone injection. Separate injection points/wells must be installed at the site for the injection.

## III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from up-gradient groundwater monitoring well MW-11; source wells MW-2 and MW-14, and down-gradient wells MW-6, and MW-9 to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Figure 1).

You are required to submit all laboratory data from groundwater monitoring over the Internet in the Electronic Deliverable Format to the State Water Resources Control Board's GeoTracker database. 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 <sup>1</sup>
Total petroleum hydrocarbons as gasoline (TPHg)	μg/L	Grab	Semi-annual
Benzene, Toluene, Ehylbenzene, Xylenes (BTEX)	μg/L	Grab	Semi-annual
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di- isopropyl ether (DIPE), ether tertiary butyl ether (ETBE)	µg/L	Grab	Semi-annual
Ethanol Formaldehyde Acetone	µg/L	Grab	Semi-annual <sup>2</sup>
Total dissolved solids Boron Chloride Bromide Sulfate	mg/L	Grab	Semi-annual
Oxidation-reduction potential	milivolts		Semi-annual

Power Gas Company Monitoring & Reporting Program No. CI-9610

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS <sup>1</sup>	
Dissolved Oxygen	mg/L	Grab	Semi-annual	
Dissolved ferrous iron Arsenic	μg/L	Grab	Semi-annual	
Total Chromium and chromium six <sup>3</sup>	μg/L	Grab	Semi-annual	
PH	pH units	Grab	Semi-annual	
Temperature	F/C	Grab	Semi-annual	
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	Semi-annual	

The first sampling event must be conducted one week following the ozone injection.

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

<sup>&</sup>lt;sup>2</sup> The Discharger is required to monitor for these compounds only if they are detected in the first sampling event.

The Discharger is required to monitor for total chromium and chromium six only if they are detected in the first sampling event.

Order No. R4-2007-0019

Power Gas Company Monitoring & Reporting Program No. CI-9610

Interim Executive Officer

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:

Date: <u>June 21, 2010</u>