



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

April 27, 2017

Mr. Marvin Kalin
c/o: Ms. Lisa Kalin
SPCW, LLC
1532 Comstock Avenue
Los Angeles, CA 90024

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7014 2870 0001 4538 1283

MODIFICATION OF GENERAL WASTE DISCHARGE REQUIREMENTS FOR IN-SITU GROUNDWATER REMEDIATION AND GROUNDWATER RE-INJECTION

SANTA PALM CAR WASH

8787 WEST SANTA MONICA BOULEVARD, WEST HOLLYWOOD
CASE NO. 900690052A; GLOBAL ID. T0603743956; CUF NO. 18883; PRIORITY B-2
ORDER NO. R4-2014-0187; SERIES NO. 240; MRP CI NO. 1007

Dear Ms. Kalin:

On January 7, 2014, the Executive Officer of the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Regional Board) issued Waste Discharge Requirements (WDR) Order No. R4-2007-0019, Series No. 240, to Santa Palm Car Wash (herein Discharger) to inject activated sodium persulfate (two percent sodium silicate activator) to remediate groundwater contamination beneath the subject site.

On February 14, 2017, on behalf of the Discharger, JHA Environmental (JHA) submitted a "WDR Permit Revision Request" to modify the existing WDR to reflect sodium hydroxide activated persulfate injection instead of activated sodium persulfate.

In December 2016, wells MW-1 through MW-8 were gauged and sampled. Depth to groundwater ranged between 17.15 feet and 21.43 feet below ground surface (bgs) with groundwater flowing south, southwest at a gradient of 0.010 foot/foot. Maximum groundwater concentrations were 82,500 micrograms per liter ($\mu\text{g/L}$) total petroleum hydrocarbon as gasoline (TPH_G), 2,590 $\mu\text{g/L}$ benzene, 3,530 $\mu\text{g/L}$ ethylbenzene, and 440 $\mu\text{g/L}$ naphthalene and non-detect for methyl tertiary butyl ether (MTBE) and tertiary butyl alcohol (TBA).

On November 9, 2016, the Los Angeles Regional Board approved the Persulfate Injection Workplan (RAP) dated September 23, 2016.

Los Angeles Regional Board staff has completed reviewing your application and determined that the proposed injections meet the conditions specified in General WDR Order No. R4-2014-0187, "General Waste Discharge Requirements for In-Situ Groundwater Remediation and Groundwater Re-Injection" adopted by the Los Angeles Regional Board on September 11, 2014. Your February 14, 2017, request for modification of WDR is approved and you are hereby enrolled under General

April 27, 2017

WDR Order No. R4-2014-0187. Your previous enrollment under General WDR R4-2007-019 is hereby terminated with the exception of enforcement under the terms of the permit.

Enclosed are Los Angeles Regional Board Order No. R4-2014-0187 (Series No. 240) and Standard Provisions Applicable to Waste Discharge Requirements and Revised Monitoring and Report Program (MRP) CI No. 1007. The proposed discharge shall not cause the mineral constituents of the receiving groundwater at the compliance point, down-gradient outside the application area, to exceed applicable limits (West Coast Basin of the Los Angeles Coastal Plain Groundwater Basin) given in Attachment B of General WDR Order No. R4-2014-0187. The WDR issued shall not be terminated until Los Angeles Regional Board staff determines the WDR is no longer needed for site cleanup.

The revised MRP No. 1007 requires you to implement the monitoring program on the effective date of this enrollment under Los Angeles Regional Board Order No. R4-2014-0187. When submitting monitoring or technical reports to the Los Angeles Regional Board per these requirements, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

In accordance with regulations adopted by the State Water Resources Control Board (State Board) in September 2004 regarding electronic submittal of information, the Discharger has been electronically submitting monitoring reports to the State Board GeoTracker system under the Underground Storage Tank Global ID T0603743956. To comply with the MRP under the WDR, the Discharger shall upload the WDR monitoring reports to the State Database GeoTracker under both Global IDs T0603743956 and WDR100014438.


For all parties who upload electronic documents to the State GeoTracker Database, the Los Angeles Regional Board will no longer accept documents (submitted by either hard copy or email) that already have been uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker Users dated December 12, 2011 at:

<http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20OGT%20Users.pdf>.

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the General WDR in a separate letter when the project is completed and the WDR 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.

If you have any questions, please contact Dr. Eric Wu at (213) 576-6683 or ewu@waterboards.ca.gov for issues regarding the WDR and Mr. Daniel P. Piroton at (213) 576-6714 or daniel.piroton@waterboards.ca.gov for issues regarding the underground storage tank case.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Ms. Lisa Kalin
Santa Palm Car Wash (SPCW)
Page 3

April 27, 2017

Enclosures: 1. General WDR Order No. R4-2014-0187
2. Revised Monitoring and Reporting Program No. CI-1007

cc: Micah Reich, State Water Resources Control Board, UST Cleanup Fund
Brian Partington, Water Replenishment District of Southern California
Tim Smith, Los Angeles County Department of Public Works
Trent Henderson, JHA Environmental

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-1007
FOR
SANTA PALM CAR WASH
8787 WEST SANTA MONICA BOULEVARD, WEST HOLLYWOOD, CALIFORNIA
(SODIUM HYDROXIDE ACTIVATED PERSULFATE FOR GROUNDWATER CLEANUP)

ENROLLMENT UNDER REGIONAL BOARD
(ORDER NO. R4-2014-0187, SERIES NO. 240)

I. REPORTING REQUIREMENTS

- A. Santa Palm Car Wash, LLC (hereinafter Discharger) shall implement this monitoring program on the effective date of this revised Monitoring and Reporting Program (MRP). The first monitoring report under this program shall be received at the Regional Board by **July 15, 2017**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 15 th
July – December	January 15 th

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP to the State Water Resources Control Board (SWRCB) GeoTracker database, Attention: Information Technology Unit.

If there is no discharge or injection during any reporting period, the report shall so state.

- B. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board (the State Board) Division of Drinking Water - 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.

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.

- C. 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.

April 27, 2017

- D. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the State Board ELAP and in accordance with current United States Environmental Protection Agency 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.
- E. 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.
- F. 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.
- G. If the Discharger performs analyses on any groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.
- H. 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.
- I. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving the Executive Officer's written approval.
- J. In accordance with regulations adopted by the SWRCB regarding ESI, Underground Storage Tank Program monitoring reports have been electronically submitted to the State Board GeoTracker system under UST Global ID T0603743956. To comply with the MRP under this WDR, the Discharger shall upload the WDR monitoring reports to GeoTracker under both Global ID T0603743956 and Global ID WDR100014438.

II. DISCHARGE MONITORING REQUIREMENTS

The reports shall contain the following information regarding injection activities:

1. Location map showing application area.
2. Written summary defining:
 - Depth of insertion and depth to groundwater;
 - Quantity of sodium hydroxide activated persulfate per area; and

- Total amount of sodium hydroxide activated persulfate applied at site.
3. Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging, and alteration.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall continue to conduct groundwater monitoring at the site. Groundwater samples shall be collected from all onsite and offsite wells associated with the site. Baseline sampling shall be conducted prior to the proposed sodium hydroxide activated persulfate application. The Discharger shall conduct groundwater monitor for the duration of the remediation in accordance with the following monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS ¹
Total petroleum hydrocarbons as gasoline (TPH _G) and as diesel (TPH _D)	µg/L ³	Grab	Semi-Annually
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	Semi-Annually
MTBE, TBA, TAME, DIPE, ETBE, Naphthalene	µg/L	Grab	Semi-Annually
Ethanol Formaldehyde Acetone	µg/L	Grab	Semi-Annually
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L ⁴	Grab	Semi-Annually
Oxidation-reduction potential	millivolts	Grab	Semi-Annually
Dissolved Oxygen	µg/L	Grab	Semi-Annually
Dissolved ferrous iron	µg/L	Grab	Semi-Annually
Total Chromium and hexavalent chromium ²	µg/L	Grab	Semi-Annually
pH	pH units	Grab	Semi-Annually
Temperature	°F/°C	Grab	Semi-Annually
Groundwater Elevation	Feet, mean sea level, and below ground surface	In situ	Semi-Annually

1. One week before injection and semi-annually thereafter.
2. The Discharger is required to monitor for total chromium and hexavalent chromium 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.
3. $\mu\text{g/L}$ = microgram per liter.
4. mg/L = milligram per liter.

All groundwater monitoring reports must include, at minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Semi-annual observation of groundwater levels, recorded to 0.01 feet mean sea level, and groundwater flow direction.

IV. MONITORING FREQUENCIES

Specifications in the MRP are subject to periodic revisions. 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.

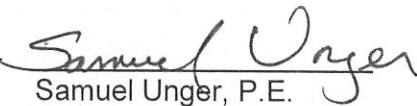
Executed on the _____ day of _____ at _____.

_____ (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 Regional Board, upon request by interested parties.

Ordered by: 
Samuel Unger, P.E.
Executive Officer

Date: April 27, 2017