



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

**Los Angeles Regional Water Quality Control Board**

April 22, 2014

Mr. Allan Fernandes  
Aramark Corporation  
1101 Market Street, 28<sup>TH</sup> Floor  
Philadelphia, PA 19107 – 2988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO.: **7008 1830 0004 3359 1008**

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER REMEDIATION AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND / OR HEXAVALENT CHROMIUM IMPACTED SITES  
ARAMARK MAGAZINE AND BOOK SERVICES FACILITY (FORMER)  
2340 SOUTH FAIRFAX AVENUE, LOS ANGELES; CASE NO. 900160098; PRIORITY A – 1;  
CLEANUP FUND ID. 3726; GLOBAL ID. T0603700559;  
ORDER NO. R4 – 2007 – 0019; SERIES NO. 251; CI NO. 10043**

Dear Mr. Fernandes:

We are in receipt of your application for coverage under the General Waste Discharge Requirements (WDR) utilizing persulfate for groundwater remediation.

The site is the former Aramark Magazine And Book Services facility located at the southwest corner of South Fairfax Avenue and Electric Drive at 2340 South Fairfax Avenue in Los Angeles, California. Between 1987 and 1988, one 6,000-gallon diesel and one 10,000-gallon gasoline underground storage tanks, dispenser, and associated piping were removed. The site is currently occupied by a manufacturer of electric automobiles.

The data from the most recent groundwater sampling event indicated elevated total petroleum hydrocarbon as gasoline (TPH<sub>G</sub>) and benzene concentrations. The maximum reported TPH<sub>G</sub> and benzene concentrations were 110,000 µg/L (TPH<sub>G</sub>) and 23,000 µg/L (benzene).

Our December 11, 2013, letter approved with conditions the "Results Of Rebound Testing And Work Plan For In-Situ Treatment" (Workplan), dated October 31, 2013, submitted by Environmental Engineering & Contracting. The Workplan proposed drilling direct-push injection wells and injecting approximately 8,000 pounds of persulfate and 300 pounds of total dissolve (FE [III]).

We have completed our review of your application and 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 Control Board on March 1, 2007.

April 22, 2014

Persulfate is permitted as an oxidation/aerobic degradation enhancement compound in the General WDRs, Order No. R4-2007-0019. To avoid material surfacing, you can go to [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/ust/guidelines/Subsurface\\_injection\\_of\\_ISRR.pdf](http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/Subsurface_injection_of_ISRR.pdf) for guidance.

Enclosed is Monitoring and Reporting Program No. CI – 10043 (MRP) which allows the use of persulfate for in-situ groundwater remediation at the site. This MRP and the General WDRs constitute the WDRs for the proposed feasibility study and full-scale implementation, if necessary.

Please include a reference to MRP No. CI – 10043 when submitting technical monitoring reports to the Regional Board. This 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.

In accordance with regulations adopted by the State Water Resources Control Board regarding electronic submittal of information, Underground Storage Tank Program (UST) monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0603700559. To comply with the MRP under the WDR, you shall upload the WDR monitoring reports to the State Database GeoTracker under the two Global ID T0603700559 and WDR100016054. For more information regarding the new Global ID for WDR, please see the ESI training video available at:

<https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

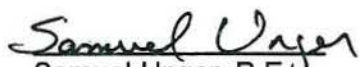
For all parties who upload electronic documents to the State GeoTracker Database, the Regional Board will no longer accept documents (submitted by either hard copy or email) that already have been uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker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

If you have any questions, please contact Mr. Daniel P. Piroton at (213) 576 – 6714 or at [dpirotton@waterboards.ca.gov](mailto:dpirotton@waterboards.ca.gov) for issues regarding the underground storage tank program or Dr. Eric Wu at (213) 576 – 6683 or at [ewu@waterboards.ca.gov](mailto:ewu@waterboards.ca.gov) for issues regarding the WDR.

Sincerely,

  
Samuel Unger, P.E.  
Executive Officer



Mr. Allan Fernandes  
Aramark Magazine And Book Services Facility  
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Enclosure: Monitoring and Reporting Program CI – 10043

cc: Ms. Kathy Jundt, State Water Resources Control Board,  
Underground Storage Tank Cleanup Fund  
Ms. Phuong Ly, Water Replenishment District of Southern California  
Mr. Hani Malki, Los Angeles City CUPA Manager  
Mr. Eloy Luna, Los Angeles City Fire Department,  
Underground Storage Tank Program  
Ms. Lara Malatesta, Aramark Corporation  
Mr. Dave Bernier, Environmental Engineering & Contracting  
Ms. Annette Lemo, The Ezralow Company

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

MONITORING AND REPORTING PROGRAM NO. CI – 10043

FOR

FORMER ARAMARK MAGAZINE AND BOOK SERVICES FACILITY  
2340 SOUTH FAIRFAX BOULEVARD, LOS ANGELES

(PERSULFATE INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4 – 2007 – 0019, SERIES NO. 251)

I. REPORTING REQUIREMENTS

- A. Aramark Corporation (hereinafter Discharger) shall implement this monitoring program on the effective date of this Monitoring and Reporting Program (MRP). The first monitoring report under this MRP, for the period from January to June 2014, shall be received at the Regional Board by July 15, 2014. 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
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. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health 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.
- C. 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.
- D. 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.

- E. Each monitoring report must affirm in writing "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.
- F. 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.
- G. 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.
- H. 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.
- I. 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.
- J. The Discharger should not implement any changes to the MRP prior to receiving Executive Officer's written approval.
- K. In accordance with regulations adopted by the State Water Resources Control Board regarding electronic submittal of information, Underground Storage Tank Program (UST) monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0603700559. To comply with the MRP under this WDR, the Discharger shall upload the WDRs monitoring reports to the Geotracker system under the two Global ID T0603700559 (continuing) and WDR100016054 (new).



II. PERSULFATE INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

1. A location map showing injection points used for the persulfate injection feasibility study. Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration. Eleven injection wells (three up-gradient to well MW-11; four up-gradient to well MW-5; and four up-gradient to well MW-17) are proposed (Figure 1). Additional injection points for full scale application should be reviewed and approved by the Regional Board prior to full scale implementation.
2. Written and tabular summary defining the quantity of persulfate 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 one up-gradient groundwater monitoring well (SW-2); three source area groundwater monitoring wells (MW-5, MW-11, and MW-17); and two down-gradient groundwater monitoring wells (MW-14 and MW-15). Additional monitoring wells for full scale implementation may be required by the Regional Board. During the feasibility study, groundwater samples will be collected approximately forty-five and ninety days after the initial injection. Groundwater shall be monitored for the duration of the remediation in accordance with the following monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS <sup>1</sup>
Total petroleum hydrocarbons as gasoline (TPH <sub>G</sub> ) and as diesel (TPH <sub>D</sub> )	µg/L <sup>3</sup>	Grab	• Semi-Annually
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-Annually
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
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 <sup>4</sup>	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 <sup>2</sup>	µg/L	Grab	• Semi-Annually
pH	pH units	Grab	• Semi-Annually
Temperature	<sup>o</sup> F/ <sup>o</sup> 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-annual sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored semi-annually thereafter.
3. µg/L = microgram per liter.
4. mg/L = milligram per liter.

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-Annual 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

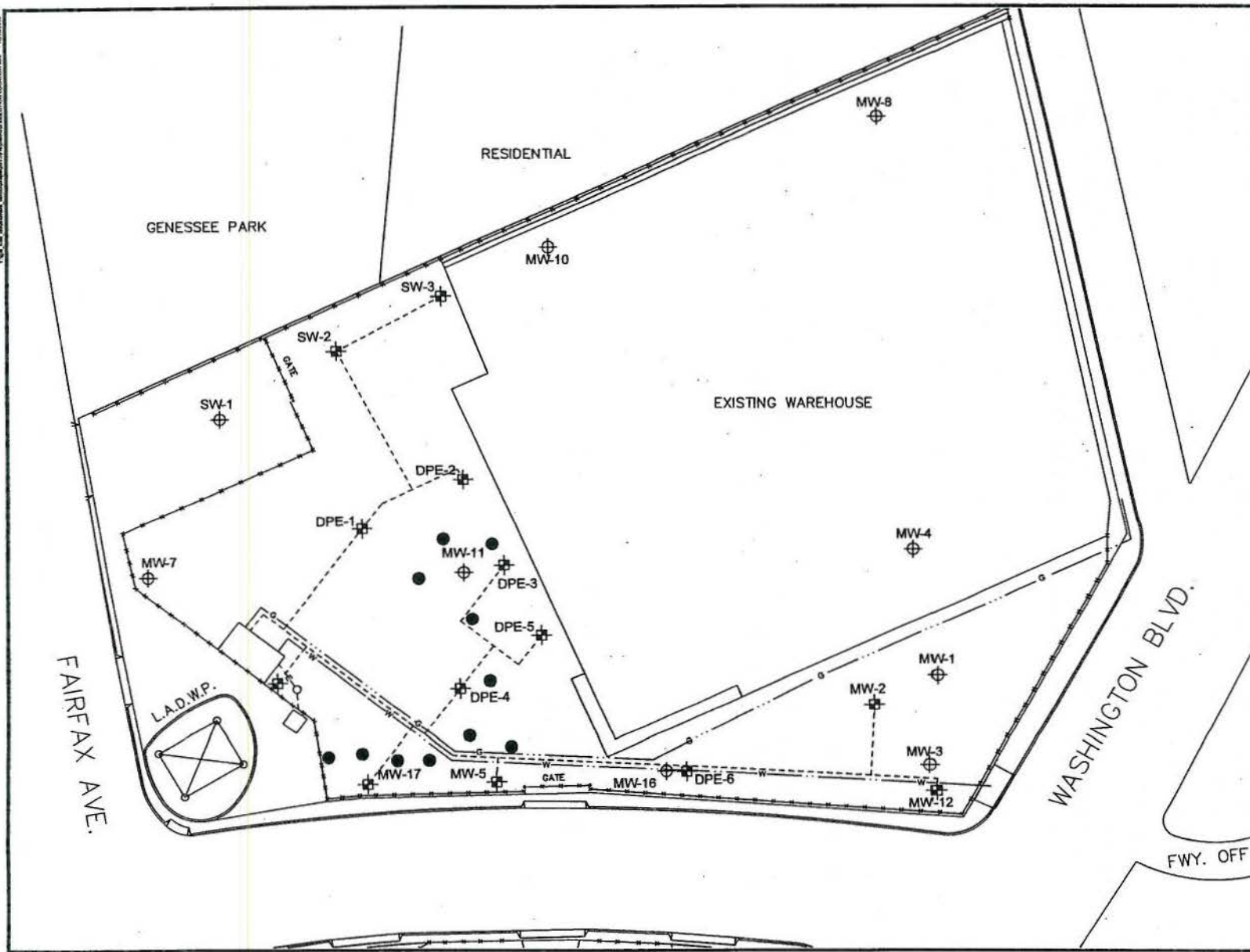
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the Regional Board.

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

Date: April 22, 2014



T:\GIS\mxd\mxd\_011713\PROJECT\AR\INJECTION\LOCATIONS\MAP - 11/19/2013



**LEGEND**

-  MW-10 Groundwater Monitoring Well
-  SW-3 Dual Phase Extraction Well
-  Percolate Injection Locations

  
  
 APPROXIMATE SCALE

Project  
 Former ARAMARK Magazine and Book Services  
 2340 South Fairfax Avenue  
 Los Angeles, California

**INJECTION LOCATION MAP**

Project Number S-1353.16		File Number S1353.16-1S13-09	
Date December 19, 2013			Figure <b>1</b>
PE/PG MZ	FM DB	Drafter AN	