



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

October 22, 2014

Mr. Bob Zaman
Matrix Collision Repair Facility
1016 South La Cienega Boulevard
Los Angeles, CA 90035

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7008 1830 0004 3359 0216

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR IN-SITU GROUNDWATER
REMEDICATION AND GROUNDWATER RE-INJECTION
PICASSO AUTO BODY
8355 WEST 3RD STREET, LOS ANGELES; CASE NO. 900480134; PRIORITY D-1;
UST CLEANUP FUND ID. 17582; GLOBAL ID. T0603780422;
ORDER NO. R4-2014-0187; SERIES NO. 006; CI NO. 10097**

Dear Mr. Zaman:

We are in receipt of your application for coverage under the General Waste Discharge Requirements (WDRs) utilizing sodium persulfate with a silica-based catalyst for groundwater remediation.

The site is the Picasso Auto Body located at the northwest corner of West 3rd Street and South Kings Road in Los Angeles, California. In July of 1998, one 500-gallon waste-oil underground storage tank (UST), one 1,000-gallon gasoline UST, and two 2,500-gallon gasoline USTs were removed from the site.

Groundwater was first identified as impacted in 2003. Free product has been detected in 5 wells at a maximum apparent thickness of 5.75 feet in 2004, while data from the most recent groundwater sampling event indicated free product in one well (GW4) at an apparent thickness of 0.01 foot. The maximum concentrations of total petroleum hydrocarbon as gasoline (TPH_G) and benzene in groundwater during the most recent monitoring event in January 2014 were 123,000 micrograms per liter (µg/L) (TPH_G) and 15,500 µg/L (benzene).

The Regional Board December 10, 2013, letter approved with conditions the "Revised Remedial Action Plan Amendment" (Workplan), dated October 10, 2013, submitted by Ami Adini & Associates, Inc. The Workplan proposed to advance four soil borings to analyze fuel constituents in the soil. These samples will provide baseline data for the proposed in-situ remediation method. The Workplan also proposes to advance five injection wells into the groundwater plume in the vicinity of monitoring well GW4 to perform a preliminary pilot test.

We have completed our review of your application and determined that the proposed discharge meets the conditions specified in Order No. R4-2014-0187, "General Waste Discharge Requirements for In-Situ Groundwater Remediation and Groundwater Re-Injection" adopted by the Los Angeles Regional Water Quality Control Board on September 11, 2014.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

Sodium persulfate is permitted as a chemical oxidant and silica-based catalysts are permitted as a chemical oxidant activator in the General WDRs, Order No. R4-2014-0187. To avoid material surfacing, you can go to http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/Subsurface_injection_of_ISRR.pdf for guidance.

Enclosed are your WDRs, consisting of Regional Board Order No. R4-2014-0187 (available online at http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/docs/GeneralWDRR4-2014-0187.pdf), Monitoring and Reporting Program (MRP) No. CI – 10097, and Standard Provisions. These allow 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.

The WDRs issued shall not be terminated until Regional Board staff determines the WDRs are no longer needed for the site cleanup.

The MRP requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2014-0187. All monitoring reports shall be sent to the Regional Board, ATTN: Information Technology Unit. Please include a reference to MRP No. CI – 10097 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 T0603780422. To comply with the MRP under the WDR, you shall upload the WDR monitoring reports to the State Database GeoTracker under both Global IDs T0603780422 (continuing) and WDR100017414 (new). 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.

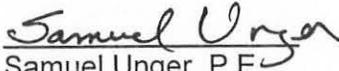
Mr. Bob Zaman
Picasso Auto Body, 8355 W. 3rd St.

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October 22, 2014

If you have any questions, please contact Mr. Dave Bjostad at (213) 576-6712 or dave.bjostad@waterboards.ca.gov for issues regarding the underground storage tank program or Dr. Eric Wu at (213) 576-6683 or at eric.wu@waterboards.ca.gov for issues regarding the WDR.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure: 1. Regional Board Order No. R4-2014-0187
 2. Monitoring and Reporting Program CI – 10097
 3. Standard Provisions

copy by e-mail:

Kathy Jundt, State Water Resources Control Board, UST Cleanup Fund
Hari Patel, State Water Resources Control Board, UST Cleanup Fund
Eloy Luna, Los Angeles City Fire Department, Underground Storage Tanks
Captain Matthew Gatewood, Los Angeles City Fire Department, Underground Storage Tanks
Phuong Ly, Water Replenishment District of Southern California
Ami Adini, Ami Adini & Associates

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

MONITORING AND REPORTING PROGRAM NO. CI – 10097

FOR

PICASSO AUTO BODY
8355 WEST 3RD STREET, LOS ANGELES, CA.

(SODIUM PERSULFATE WITH SILICA-BASED ACTIVATOR INJECTION FOR
GROUNDWATER CLEANUP)
(ORDER NO. R4-2014-0187, SERIES NO. 006)

I. REPORTING REQUIREMENTS

- A. Matrix Collision Repair Facility (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 July to December 2014, shall be received at the Regional Board by January 15, 2015. 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

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 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.
- 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

reports to the GeoTracker system under both Global IDs T0603780422 (continuing) and WDR100017414 (new).

II. SODIUM PERSULFATE AND SILICA-BASED ACTIVATOR INJECTION MONITORING REQUIREMENTS

The reports shall contain the following information regarding injection activities:

1. A location map showing injection points.
2. Written and tabular summary defining the quantity of sodium persulfate and activator injected on each injection date, the cumulative quantity injected at each location, and the total cumulative amount injected at the site.

Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration. Five injection wells (encircling GW4) are proposed (Figure 1). Additional injection points for full scale application must be reviewed and approved by the Regional Board prior to full-scale implementation.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site to monitor the effectiveness and ensure no adverse impacts from the injections. Groundwater samples shall be collected from one up-gradient groundwater monitoring well (GW1); three source area groundwater monitoring wells (GW2, GW3 and GW4); and two downgradient groundwater monitoring wells (GW6A and GW7A). Additional monitoring wells for full-scale implementation may be required by the Regional Board. During the feasibility study, groundwater samples shall be collected approximately forty-five and ninety days after the initial injection; constituents analyzed shall be the same as in the table below. Groundwater shall be monitored for the duration of the full-scale 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
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE),	µg/L	Grab	Semi-Annually

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)

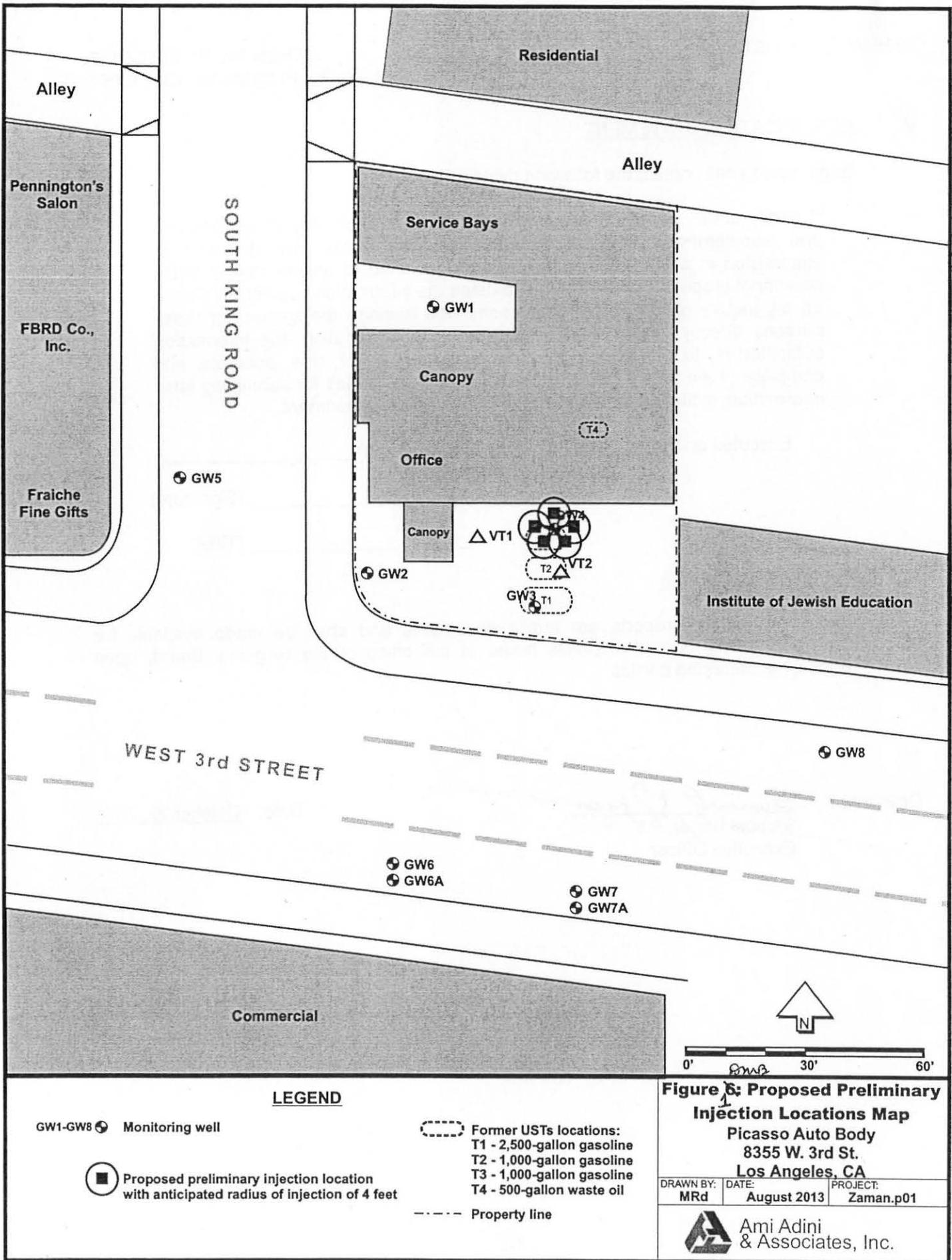
_____ (Title)"

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
Samuel Unger, P.E.
Executive Officer

Date: October 22, 2014



LEGEND

- GW1-GW8 Monitoring well
- Proposed preliminary injection location with anticipated radius of injection of 4 feet
- Former USTs locations:
 T1 - 2,500-gallon gasoline
 T2 - 1,000-gallon gasoline
 T3 - 1,000-gallon gasoline
 T4 - 500-gallon waste oil
- Property line

Figure 6: Proposed Preliminary Injection Locations Map

Picasso Auto Body
 8355 W. 3rd St.
 Los Angeles, CA

DRAWN BY:	DATE:	PROJECT:
MRd	August 2013	Zaman.p01

Ami Adini & Associates, Inc.

Figure 1

Los Angeles Regional Water Quality Control Board

TO: Order No. R4-2014-0187; Series No. 006; UST Case No. 900480134

FROM: Dave Bjostad *DMB*

DATE: October 17, 2014

SUBJECT: EVALUATION OF INFORMATION SUPPORTING GENERAL WASTE DISCHARGE REQUIREMENTS FOR IN-SITU GROUNDWATER REMEDIATION AND GROUNDWATER RE-INJECTION

PICASSO AUTO BODY

8355 WEST 3RD STREET, LOS ANGELES; CASE NO. 900480134; PRIORITY D-1;

UST CLEANUP FUND ID. 17582; GLOBAL ID. T0603780422;

ORDER NO. R4-2014-0187; SERIES NO. 006; CI NO. 10097

Site Background

- The subject site, Picasso Auto Body Shop operated by Matrix Collision Repair Facility (hereinafter Discharger) operates at the northeast intersection of West 3rd Street and South King Road in Los Angeles, California (Figure 1). The site is located in a mixed use residential and commercial area.
- The site is located within the Coastal Plain of the Los Angeles Groundwater Basin. The subsurface lithology of the site consists primarily of clay from the ground surface to approximately 30 feet below ground surface (bgs).
- The nearest production well (CBH-2) is located approximately 6,226 feet from the site.
- In July 1998, one 500-gallon waste-oil underground storage tank (UST), one 1,000-gallon gasoline UST, and two 2,500-gallon gasoline USTs were removed from the site. Several phases of site investigations conducted since then have indicated that the soil and groundwater beneath the site have been impacted by fuel constituents and volatile organic compounds (VOCs).
- Eighteen groundwater monitoring or remediation wells (GW1 through GW5, GW6A, GW7A, GW8, MW9 through MW-16, VT1, VT2 – see Figure 2) have been installed at the site. The most recent groundwater monitoring data (January 2014) reported free product in one well (GW4, 0.01 foot apparent thickness) and a maximum total petroleum hydrocarbons as gasoline (TPH_G) concentration of 123,000 micrograms per liter (µg/L) and benzene concentration of 15,500 µg/L. The depth to groundwater ranges from approximately 15.68 feet to 17.4 feet bgs and groundwater flow direction is to the south and southwest.
- A Revised Remedial Action Plan Amendment (RAP Amendment) dated October 10, 2013, proposed to inject sodium persulfate with a silica-based catalyst (Persulfox™) to remediate groundwater and control offsite plume migration.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles



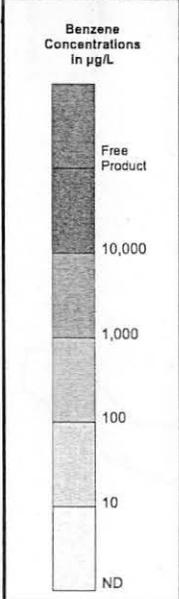
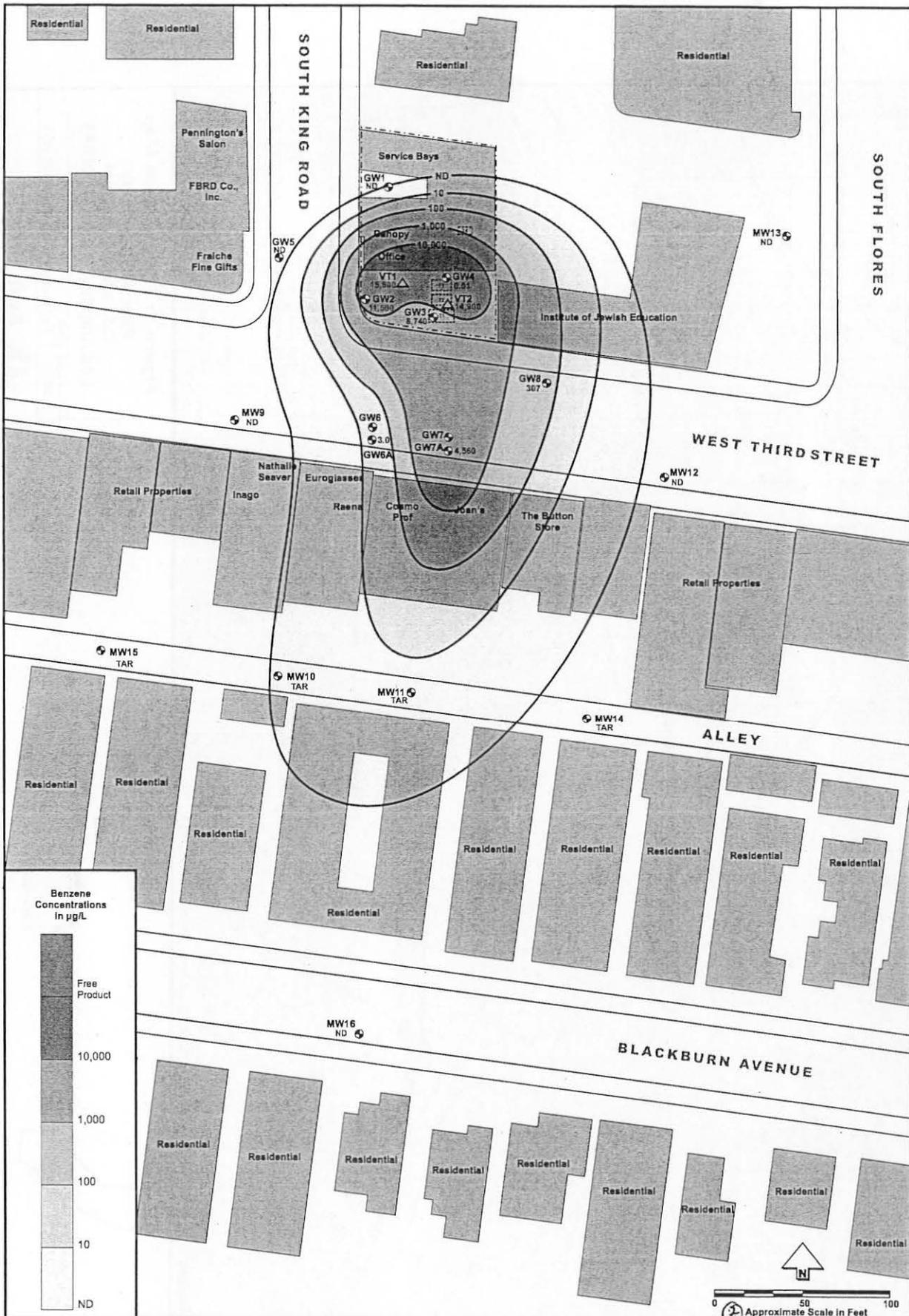
Approximate Scale in Miles

Figure 1: Site Location Map
Picasso Auto Body
8355 West 3rd Street
Los Angeles, California 90048

DRAWN BY: MRd	DATE: February 2014	PROJECT: Zaman.p01
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Ami Adini
& Associates, Inc.



GW1 - GW8 Groundwater monitoring wells (CWR, 2003)
 GW6A, GW7A, MW9 - MW16 Groundwater monitoring wells (AA&A, 2008 & 2009)
 VT1-VT2 Soil vapor extraction wells (CWR, 2004)
 Benzene isoconcentration contour
 Apparent benzene isoconcentration contour
 11,500 Benzene concentration in micrograms per liter
 ND Not detected at or above laboratory detection limits
 0.09 Free product thickness in feet

LEGEND
 Former UST locations:
 T1 - 2,500-gallon gasoline
 T2 - 1,000-gallon gasoline
 T3 - 1,000-gallon gasoline
 T4 - 500-gallon waste oil
 Property line
 GW6 and GW7 not used due to high traffic

Figure 2: Concentrations of Benzene in Groundwater 1Q14
 Picasso Auto Body
 8355 West 3rd Street
 Los Angeles, California 90048
 DRAWN BY: DATE OF EVENT: PROJECT:
 AP 01/21/2014 Zaman.p01
Ami Adini & Associates, Inc.

Fig. 2