

Los Angeles Regional Water Quality Control Board

January 22, 2016

Mr. Richard Schoebel
Retail Opportunity Investments Corporation
8905 Towne Centre Drive, Suite 108
San Diego, California 92122

**TERMINATION OF COVERAGE UNDER GENERAL WASTE DISCHARGE REQUIREMENTS
– FORMER PARAMOUNT PLAZA DRY CLEANERS, 15729 DOWNEY AVENUE,
PARAMOUNT, CALIFORNIA (FILE NO. 14-136, ORDER NO. R4-2014-0187, SERIES NO.
012, CI-10108, GLOBAL ID. WDR 100020352)**

Dear Mr. Schoebel,

On December 19, 2014, this Regional Water Quality Control Board (Regional Board) informed you that the subject discharge is regulated under Regional Board Order No. R4-2014-0187, which specifies your Waste Discharge Requirements (WDR). In a letter June 19, 2015, you notified the Regional Board that you ceased injection of emulsified vegetable oil and bioaugmentation organisms at the subject site and requested termination of the WDR.

At this time, Retail Opportunity Investments Corporation is no longer injecting emulsified vegetable oil and bioaugmentation organisms. In addition, the WDR monitoring requirements are incorporated into the groundwater remediation progress monitoring program and overseen by the Site Cleanup Program as indicated in the Regional Board letter dated January 19, 2016 (enclosed). Therefore, the coverage for the subject facility under Regional Board Order No. R4-2014-0187 is no longer necessary and hereby terminated, with the exception of enforcement under the terms of the permit. If you have any questions, please contact the Project Manager, Dr. Ann Chang at (213) 620-6122 (ann.chang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (eric.wu@waterboards.ca.gov).

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosure: Regional Board letter dated January 19, 2016

cc: Mr. Peter Ton, Wactor & Wick LLP
Mr. Jay Jones, Environmental Navigation Services, Inc.



EDMUNDO G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

January 19, 2016

Mr. Richard Schoebel
Retail Opportunity Investments Corporation
8905 Towne Centre Drive, Suite 108
San Diego, California 92122

SUBJECT: REVISED GROUNDWATER MONITORING

SITE: FORMER PARAMOUNT PLAZA DRY CLEANERS LOCATED AT 15729 DOWNEY AVENUE, PARAMOUNT, CALIFORNIA 90723 (SITE CLEANUP PROGRAM NO. 0902, SITE ID NO. 2048W00, GLOBAL IDS SL2048W1709 AND WDR100020352)

Dear Mr. Schoebel:

On behalf of Retail Opportunity Investments Corporation (ROIC), Environmental Navigation Services, Inc. submitted a *Remedial Action Plan* (RAP), dated June 28, 2013 to propose enhanced in-situ bioremediation for the cleanup of groundwater at the subject site. On December 19, 2014, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff approved the RAP. ROIC was enrolled under the General Waste Discharge Requirements (WDR Order No. R4-2014-0187) with a Monitoring and Reporting Program No. CI-10108 for the injection of emulsified vegetable oil and bioaugmentation organisms. ROIC conducted the injection activities in January 2015 and submitted a WDR termination request in June 2015. To date, Groundwater Permitting Unit (GPU) staff have held several conference calls with the representatives of ROIC to clarify the requirements and processes for the WDR termination.

Based on review of the *Third Quarter 2015 WDR Groundwater Injection and Monitoring Report* dated October 12, 2015, GPU staff concluded that the concentrations of the injected bioaugmentation organisms and volatile organic compounds have not stabilized and determined that the WDR monitoring requirements shall continue at this time. Therefore, the WDR monitoring requirements should be incorporated into the current groundwater remediation progress monitoring program at the site in lieu of a separate groundwater monitoring under the WDR Order No. R4-2014-0187. To ensure that the injection will not cause adverse impacts to the groundwater quality, the groundwater remediation progress monitoring is modified with the following conditions:

CHARLES STROUDER, CHAIR | SAMUEL UNDER, EXECUTIVE OFFICER

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

1. Groundwater samples shall be collected from monitoring wells MW-2, MW-4, MW-6, and MW-7 for analyses of volatile organic compounds, dissolved gases (methane, ethane, and ethene), and *Dehalococcoides* species on a quarterly schedule.
2. Groundwater samples shall be collected from monitoring wells MW-1 and MW-8 for analyses of volatile organic compounds, dissolved gases (methane, ethane, and ethene), and *Dehalococcoides* species on a semi-annual schedule.

If you have any questions, please contact Mr. Adnan Siddiqui (project manager) at (213) 576-6812 (asiddiqui@waterboards.ca.gov) or Dr. Arthur Heath, Section Chief at (213) 576-6725(aheath@waterboards.ca.gov).

Sincerely,



Adnan Siddiqui, CHG
Senior Engineering Geologist

cc: Peter Ton, Wactor & Wick LLP (via e-mail)
Jay Jones, Environmental Navigation Services, Inc. (via e-mail)

WDR Termination Request

June 19, 2015

Former Paramount Plaza Dry Cleaner, Paramount Plaza, Paramount, CA

WDR 100020352

Dr. Ann Chang

California Regional Water Quality Control Board- Los Angeles Region

320 West 4th Street, Suite 200

Los Angeles, CA 90013

June 19, 2015

By E-mail

**RE: WDR Termination Request:
Former Paramount Plaza Dry Cleaner Site
Paramount Plaza Shopping Center,
15729 Downey Avenue, Paramount, CA 90723
FILE NO. 14-136, ORDER NO. R4-2014-0187,
SERIES NO. 012, CI-10108, GLOBAL ID. WDR 100020352**

Dear Ms. Chang,

This letter is a formal request to terminate WDR 100020352 on the behalf of Retail Opportunity Investments Corporation Paramount Plaza LLC, the WDR permittee.

A report was submitted to the RWQCB dated April 30, 2015 that summarized the results of activities conducted in compliance with WDR 100020352. It was prepared in response to the RWQCB-approved Waste Discharge Requirements (WDR) dated December 19, 2014 and documented the groundwater remediation and WDR-required groundwater monitoring and reporting program (MRP).

As described in the report submitted to you on April 30, 2015, the injection work was conducted January 19 to 21, 2015 and has been completed in accordance with General WDR Order No. R4-2014-0187, General Waste Discharge Requirements for In-Situ Groundwater Remediation and Groundwater Re-Injection, adopted by the RWQCB on September 11, 2014.

The results of the MRP conducted in accordance with the WDR demonstrate that the groundwater injection ("discharge") did not cause the mineral constituents of the receiving groundwater at the compliance point to be in excess of applicable limits (Central Basin of the Los Angeles Coastal Plain Groundwater Basin) given in Attachment B of General WDRs Order No. R4-2014-0187. This finding is based on the results of four groundwater sampling events as described and documented in the report submitted to the RWQCB dated April 30, 2015.

Further, based on review of historical groundwater data, recent groundwater observations, and no plans for additional injections, no exceedances of WQOs are expected to occur. No additional sampling for MRP analytes is necessary or recommended to support that the injection had no significant or deleterious impacts on groundwater quality.

WDR Termination Request

June 19, 2015

Former Paramount Plaza Dry Cleaner, Paramount Plaza, Paramount, CA

WDR 100020352

The WDR permit requires an annual fee that covers the fiscal year billing period beginning July 1 and ending June 30, the following year. It is requested that the WDR be terminated on or before June 30, 2015 prior to the new fiscal year beginning July 1, 2015.

Separate quarterly groundwater monitoring for HVOCs will continue under the 13267 Order to assess the continued performance of the groundwater remedy.

Please contact the undersigned should you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay W. Jones", with a horizontal line extending to the right from the end of the signature.

Jay W. Jones, PG#4106, Ph.D.
Environmental Navigation Services, Inc.