
Los Angeles Regional Water Quality Control Board

April 7, 2020

Ms. Laura A. Fleming
Chief, Environmental Division
DLA Installation Management for Energy
8725 John J. Kingman Road, Rm 2828
Fort Belvoir, VA 22060-6222
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WASTE DISCHARGE REQUIREMENTS FOR ONSITE TREATMENT OF CONTAMINATED SOIL – DEFENSE FUEL SUPPORT POINT SAN PEDRO, 3171 NORTH GAFFEY STREET, SAN PEDRO, CALIFORNIA (ORDER NO. 90-148, Series No. 151, CI-10314, GEOTRACKER GLOBAL ID. T10000010232)

Dear Ms. Fleming:

The Los Angeles Regional Water Quality Control Board (Regional Water Board), has received your letter dated March 9, 2020, transmitting an *Application/Report of Waste Discharge* (ROWD), dated March 3, 2020, prepared by the Source Group, Inc. (SGI) for the Defense Logistics Agency – Energy (Discharger). The ROWD was submitted to apply for waste discharge requirements (WDRs) to continue bio-remediation of petroleum hydrocarbon contaminated soils at the Defense Fuel Support Point San Pedro (Site) at 3171 North Gaffey Street, San Pedro, California.

The Site is owned by the United States Department of the Navy (US Navy) and was historically used to receive, store, and distribute military fuel. Active operations at the Site ceased in 2012 and the tanks and above ground infrastructure have been decommissioned. As a result of past operations, soil and groundwater at the Site have been contaminated with petroleum hydrocarbons. Remediation of soil and groundwater at the Site, including removal of light non-aqueous phase liquid (LNAPL), has been on-going since 1996 and has been overseen by the Regional Water Board Site Cleanup Program (SCP). However, the remediation system overseen by the SCP has not significantly reduced hydrocarbon levels in soil at the vadose-zone and shallow saturated-zone.

The bioremediation, referred to as the Bulldog Green Remediation (BGR) technology, includes excavating and processing contaminated soil by adding a surfactant and bacteria solution and placing the soil into biotreatment piles (bio-piles) to provide adequate time for bacteria to destroy the hydrocarbons. Each bio-pile is approximately 20 feet wide, 8 feet tall and 210 feet long. The bio-piles are lined with high-density polyethylene (HDPE) plastic liners. A vapor extraction system consists of an electric motor and blower to extract soil vapors from the subsurface. A pilot study conducted at the Site in 2015, followed by a laboratory study conducted in association with the California State University at Chico, indicates that the proposed bioremediation is an effective technology to remediate petroleum hydrocarbon contamination in soil at the Site. The proposed cleanup goals of the bioremediation were included in an Interim Remediation Action Plan (IRAP) that was conditionally approved by the Regional Water Board SCP staff in a letter dated February

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21, 2017. A copy of the letter, as well as the proposed cleanup goals, are included herein as references.

On April 7, 2017, April 6, 2018, and April 8, 2019, the Regional Water Board issued coverage for the project under Order No. 90-148, *General Waste Discharge Requirements for Land Treatment of Petroleum Hydrocarbon Contaminated Soil in Los Angeles and Santa Clara River Basins* (General WDRs). However, due to unexpected delays, the project is not expected to be completed before coverage under the General WDRs expires on April 7, 2020. The ROWD was submitted to extend coverage under the General WDRs so that the bioremediation project at the Site may continue. The ROWD indicates that 38,536 cubic yards of petroleum hydrocarbon-impacted soil have been treated to date, of which 12,945 cubic yards of soil are currently under treatment. SGI estimates the project to be completed in December 2020 pending the renewal of General WDRs coverage and a variance issued by the South Coast Air Quality Management District (SCAQMD).

Regional Board staff has completed review of the ROWD and determined that it is appropriate to continue the General WDRs coverage for the bioremediation project. Enclosed is the WDRs package, including:

1. General Waste Discharge Requirements (Order No. 90-148);
2. Monitoring and Reporting Program No. CI-10314;
3. Regional Board SCP staff letter dated February 21, 2017; and
4. Cleanup goals.

Please note that coverage under the General WDRs is applicable only to the proposed bioremediation operations. The excavation, relocation, and storage of contaminated soil, as well as the reuse of treated soil, are still regulated by the SCP.

Please further note that the General WDRs only allow the land treatment of a maximum of 100,000 cubic yards of petroleum hydrocarbon contaminated soil and that the permitted treatment operations must be completed within 365 days of the date of this letter. A separate ROWD must be filed and approved in advance by the Regional Water Board Executive Officer if either the volume of contaminated soil being treated exceeds 100,000 cubic yards or the treatment period exceeds 365 days.

If you have any questions regarding the General WDRs, please contact Dr. Wen Yang, Chief of the Land Disposal Unit at the Regional Board, at (213) 620-2253 or wen.yang@waterboards.ca.gov. Questions related to the remediation of the Site in general should be directed to Mr. Robert Ehe, Case Manager from the SCP, at (213)-576-6740 or robert.ehe@waterboards.ca.gov.

Sincerely,

Renee Purdy
Executive Officer

Enclosures

CC: Walter Morales, The Source Group (walter.morales@apexcos.com)
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