



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

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Edmund G. Brown Jr
Governor

June 8, 2011

Stephen Defibaugh, Senior Specialist – EHS Remediation
SFPP, L.P. – Norwalk Pump Station
1100 Town and Country Road
Orange, CA 92868

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. 7008 1830 0004 3359 2142

Dear Mr. Defibaugh:

TRANSMITTAL OF THE WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT, AND TIME SCHEDULE ORDER (TSO) FOR SFPP, L.P., NORWALK PUMP STATION, NORWALK, CA (NPDES NO. CA0063509, CI NO. 7497)

Our letters dated December 7, 2010, March 11, 2011, and April 13, 2011, transmitted the tentative and revised tentative waste discharge requirements for renewal of your permit for the discharge of wastes under the National Pollutant Discharge Elimination System (NPDES) Program and tentative and revised tentative Time Schedule Order (TSO).

Pursuant to Division 7 of the California Water Code, this Regional Water Board at a public hearing held on June 2, 2011, reviewed the tentative requirements, considered all factors in the case, and adopted Order No. R4-2011-0095 (NPDES permit) and TSO No. R4-2011-0096.

Order R4-2011-0095 serves as an NPDES permit, and it expires on May 10, 2016. Section 13376 of the California Water Code requires that an application/Report of Waste Discharge for a new permit must be filed at least 180 days before the expiration date. The TSO No. R4-2011-0096 expires on December 21, 2013.

You are required to implement the Monitoring and Reporting Program (MRP) on the effective date (July 2, 2011) of Order No. R4-2011-0095. Your first monitoring report for the period of July 2011 through September 2011, is due by November 15, 2011. The first technical and/or progress report required under TSO No. R4-2011-0096 is due by December 31, 2011, as listed on page 5 of the TSO. Submit all monitoring and technical/progress reports to the Regional Water Board, ATTN: Information Technology Unit.

When submitting monitoring or technical reports to the Regional Water Board per these requirements, please include a reference to Compliance File CI-7497 and NPDES No. CA0063509, which will assure that the reports, are directed to the appropriate file and staff. Please do not combine your discharge monitoring reports with other reports, such as technical/progress reports. Submit each type of report as a separate document.

California Environmental Protection Agency



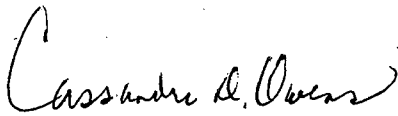
Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

We are sending the paper copy of the Permit and TSO to the Discharger only. For those on the mailing list or other interested parties who would like access to a copy of the Permit, please go to the Regional Water Board's website at:

http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/by_permits_tools.shtml.

If you have any questions, please contact Mazhar Ali at (213) 576-6652.

Sincerely,



Cassandra D. Owens, Chief
Industrial Permitting Unit

Enclosures

cc: Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
U.S. Army Corps of Engineers
NOAA, National Marine Fisheries Service
Department of Interior, U.S. Fish and Wildlife Service
NPDES Wastewater Unit, State Water Resources Control Board, Division of Water Quality
Mr. William Paznokas, Department of Fish and Game, Region 5
Department of Health Services, Sanitary Engineering Section
California State Parks and Recreation
California Coastal Commission, South Coast Region
Water Replenishment District of Southern California
Los Angeles County, Department of Public Works, Waste Management Division
Ms. Leah G. Walker, DPH, Division of Drinking Water and Environmental Management
Dr. Mark Gold, Heal the Bay
Ms. Liz Crosson, Santa Monica BayKeeper
Mr. David Beckman, Natural Resources Defense Council
Ms. Mary Welch, PG Environmental, LLC
Mr. Daniel Jablonski, CH2M Hill
Mr. Jae Kim, TetraTech

State of California

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

TIME SCHEDULE ORDER NO. R4-2011-0096

REQUIRING SFPP, L.P.
(NORWALK PUMP STATION)
TO COMPLY WITH THE REQUIREMENTS PRESCRIBED IN
ORDER NO. R4-2011-0095
(NPDES PERMIT NO. CA0063509)

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter Regional Water Board), finds:

1. SFPP, L.P. (hereinafter SFPP or Discharger) discharges wastewater under Waste Discharge Requirements (WDRs) contained in Order No. R4-2011-0095 adopted by the Regional Water Board on June 2, 2011, which serves as the National Pollutant Discharge Elimination System (NPDES) permit (No. CA0063509) for the facility known as Norwalk Pump Station (hereinafter Facility). Order No. R4-2011-0095 expires on May 10, 2016.
2. SFPP previously operated a fuel pumping station at the Facility, located at 15306 Norwalk Boulevard in the City of Norwalk, on a property owned by the U.S. Air Force. The fuel pump station has been decommissioned, but three pipelines remain in service and continue to convey refined petroleum fuels including gasoline, diesel, and jet fuel. The Discharger has implemented a remedial action plan for on-site soil and ground water cleanup.

SFPP's current remediation system consists of soil vapor extraction (SVE), total fluids extraction (TFE), groundwater extraction (GWE), and treatment of extracted soil vapor and groundwater to address the south-central and southeastern areas of the Site. Since July 2010, SFPP has been extracting groundwater from 10 wells in the south-central area and up to 3 wells in the southeastern area. SFPP's TFE and GWE systems are designed to: contain and reduce the extent of free product; provide hydraulic capture of dissolved chemicals of potential concern (COPCs); and lower the free product surface (where present) and groundwater table, thus exposing more hydrocarbon-impacted soil for SVE.

Free product and groundwater extracted by the TFE and GWE wells are conveyed to the ground water treatment system (GWTS) that currently includes an oil-water separator and liquid-phase granular activated carbon (LGAC). Free product, if any, from the oil-water separator is collected in a storage tank and recycled at an offsite location. Water from the oil-water separator is treated using LGAC to remove adsorbable organic compounds. A maximum 150,000 gallons per day (gpd) of treated wastewater is routed through an on-site 8,000-gallon effluent storage tank prior to discharge from Discharge Point No. 001 to Coyote Creek, a water of the United States, within the San Gabriel River Watershed.

SFPP L.P.
Norwalk Pump Station
Time Schedule Order No. R4-2011-0096

3. The NPDES permit adopted on June 2, 2011, includes a maximum daily effluent limitation (MDEL) of 12 micrograms per liter ($\mu\text{g/L}$) for tertiary butyl alcohol (TBA). This TBA effluent limit is a new regulatory requirement. SFPP's GWTS is not designed to treat TBA, because the previous permit (Order No. R4-2005-0072) did not include an effluent limit for TBA. New or modified control measures are necessary for the Discharger to comply with the final effluent limitation for TBA. Such control measures cannot be designed, installed, and put into operation within 30 calendar days.
4. TBA is present in the southeastern area of the site at concentrations up to 15,000 $\mu\text{g/L}$ in the extraction wells and up to 90,000 $\mu\text{g/L}$ in a nearby monitoring well (PZ-5). TBA is also present in the south-central area at concentrations up to 9,000 $\mu\text{g/L}$ in the extraction wells. The water collected from the wells is mixed prior to discharge.

TBA concentrations in the effluent range between 1,500 and 2,000 $\mu\text{g/L}$ for samples collected from the effluent during January and February 2011, during normal operation of the south central area extraction wells. TBA concentrations in the effluent are anticipated to increase when the southeastern extraction wells are brought on-line because data indicate TBA concentrations are higher in this area. The southeastern area extraction wells were down during January and early February 2011, due to issues with the piping that conveys water from the southeastern area to the remediation system, located in the south-central area. Investigation and repair of the conveyance piping was completed on February 10, 2011.

5. TBA is highly soluble and nonadsorptive. Therefore, separation technologies such as air stripping and carbon adsorption that are effective for many other organic compounds are not effective for TBA. TBA treatment options are limited to destruction via chemical oxidation or biological treatment, either of which can be applied in situ or ex situ. Because hydraulic control is necessary at the Facility, the available treatment options were limited to ex situ chemical oxidation and biological treatment options. For relatively high TBA concentrations such as those at the Facility, chemical oxidation is generally not cost-effective. A further disadvantage of chemical oxidation is the handling requirements for chemical oxidants such as hydrogen peroxide and ozone present additional health and safety risks.

Biological treatment for TBA is typically accomplished aerobically by means of fluidized bed bio reactors (FBBRs). FBBRs consist of aboveground tanks containing microorganisms, primarily bacteria, which attach to the surfaces of sand grains or granular activated carbon (GAC) granules. These particles are distributed or fluidized in the tank by the upward flow of the water in the tank. The microorganisms consume TBA and other dissolved gasoline components (such as MTBE and total petroleum hydrocarbons quantified as gasoline [TPH-g]) as food, using oxygen supplied from ambient air and/or oxygen boosters. The Discharger proposes to use FBBRs as TBA treatment technology for the Facility.

6. The Discharger plans to install permanent FBBRs to treat TBA. Two FBBRs are proposed in conjunction with SFPP's existing GWTS. The combined maximum capacity for two FBBR systems is estimated at 60 gallons per minute (gpm) or 86,400 gallons per day (gpd). The FBBRs would be added after the existing oil-water

separator and three of the existing LGAC vessels in series (assuming LGAC is the selected pretreatment option). This would provide pretreatment ahead of the FBBRs to remove the majority of the organic constituents other than TBA. If low concentrations of organic constituents were to pass through the GAC units, they would be consumed in the FBBRs. The effluent from the existing LGAC vessels will flow to a surge tank, which will serve as a feed tank to the FBBRs. This will help provide a constant flow rate to the FBBRs. Additional LGAC treatment (two vessels in series) will be added after the FBBR treatment to serve as a backup should there be a sudden increase in influent contaminant concentrations or an upset in the bioreactor. It will take 30 months for treatment system design (including review, modifications, and finalization), applying and obtaining other permits (from the City and other regulatory agencies), procurement of contractors (include preparation of General Contractor Bid Package and Contractor selection), equipment installation, testing, and start-up. The Discharger plans to meet the final effluent limit of 12 µg/L when the permanent FBBR system becomes operational.

7. The Discharger was not required to monitor for TBA in its previous permit (Order No. R4-2005-0072). Hence, there is a very limited data set to determine the upper and lower trends of the influent concentrations of TBA. The small data set available yielded a maximum concentration of 90,000 µg/L.

The Discharger plans to install a portable FBBR supplied by Cardno Environmental Resolutions, Inc. (ERI). The portable unit will operate for 30 months until the permanent FBBR systems are installed. Based on the uncertainties associated with the performance of the portable treatment unit and the concentrations of TBA in the influent, the Discharger requested a Time Schedule Order (TSO) establishing an interim effluent limit for TBA of 150 µg/L for the 30 month period following adoption of the permit on June 2, 2011.

8. Water Code section 13300 states:

"Whenever a Regional Board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements."

9. Since SFPP's current GWTS is not designed to treat TBA, the Discharger cannot achieve immediate compliance with the final effluent limit for TBA in Order No. R4-2011-0095. Accordingly, pursuant to Water Code section 13300, a discharge of waste is taking place and/or threatens to take place that violates requirements prescribed by the Regional Water Board. Therefore, this TSO establishes an interim effluent limit for TBA and requires the Discharger to undertake specific actions to put the Discharger on the path towards compliance with the final effluent limit for TBA in as short amount of time as possible, taking into account the technological, operational, and economic factors that affect the design, development, and implementation of the

control measures that are necessary to comply with the final effluent limit for TBA.

10. Water Code section 13385, subdivisions (h) and (i), require the Regional Water Board to impose mandatory minimum penalties upon dischargers that violate certain effluent limits. Section 13385(j)(3) exempts violations of an effluent limit from mandatory minimum penalties "where the waste discharge is in compliance with either a cease and desist order issued pursuant to Section 13301 or a time schedule order issued pursuant to Section 13300 or 13308, if all of the [specified] requirements are met."
11. Full compliance with the requirements of this TSO exempts the Discharger from mandatory minimum penalties for violations of the final effluent limitation for TBA only in Order No. R4-2011-0095 pursuant to Water Code section 13385(j)(3). Water Code section 13385(j)(3) also requires the Discharger to prepare and implement a pollution prevention plan pursuant to Water Code section 13263.3. Therefore, a pollution prevention plan will be necessary for TBA.
12. This TSO specifies the actions that the Discharger is required to take in order to correct the violations that would otherwise be subject to mandatory minimum penalties pursuant to Water Code section 13385 subdivisions (h) and (i). This TSO requires the Discharger to install treatment units that will allow the Discharger to achieve full compliance with the final effluent limitation for TBA prescribed in Order No. R4-2011-0095, and prescribes an interim effluent limitation for TBA for the Discharger to comply with until the final compliance date.
13. Since the time schedule for completion of the actions necessary to bring the waste discharge into compliance exceeds one year from the effective date of this TSO, this TSO includes interim requirements and the dates for their achievement. The interim requirements include both an interim effluent limitation for TBA and actions and milestones leading to compliance with the final effluent limitation for TBA. This TSO does not exceed five years.
14. A TSO is appropriate in these circumstances in order to accommodate the Discharger's design and installation of the permanent FBBR systems at the Facility. Further, the temporary TBA exceedances allowed by this TSO are in the public interest given the significant environmental benefits associated with promptly achieving compliance with the final effluent limitation.
15. The Regional Water Board has notified the Discharger, interested agencies, and interested persons of its intent to issue this TSO concerning compliance with waste discharge requirements. The Regional Water Board heard and considered all testimony pertinent to this matter in a public hearing.
16. The Regional Board may reopen this TSO at its discretion or, at the request of the Discharger, if warranted.
17. Issuance of this TSO is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et seq.) in accordance with Section 15321(a)(2), Title 14 of the California Code of Regulations.

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18. Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the Regional Water Board action, except that if the thirtieth day following the action falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

IT IS HEREBY ORDERED that, pursuant to California Water Code Section 13300, SFPP, L.P. shall comply with the requirements listed below to ensure compliance with the final effluent limitation for TBA contained in Order No. R4-2011-0095:

1. Comply with the following interim effluent limit for tertiary butyl alcohol (TBA), which shall be deemed effective from July 2, 2011, to December 31, 2013.

Constituent	Units	Interim Daily Maximum Effluent Limitation
Tertiary butyl alcohol	µg/L	150

2. Achieve full compliance with the final effluent limit for TBA as specified in Order No. R4-2011-0095 no later than January 1, 2014.
3. Comply with the following schedule as proposed in the Discharger's Work Plan for installation of a treatment system for TBA removal with an implementation period of 2.5 years:

Task	Deadline
Install Portable TBA Treatment System	June 2, 2011
Design Preliminary TBA Treatment System	June 10, 2012
Obtain Necessary Permitting for TBA Treatment System	June 26, 2012
Design Final TBA Treatment System	September 4, 2012
Procure Contractors	February 19, 2013
Construction to Containment Pad	March 14, 2013
Install Equipment for TBA Treatment System	August 6, 2013
Startup and Shakedown	December 31, 2013
Achieve Compliance with Final Effluent Limit for TBA	January 1, 2014

4. Submit to the Executive Officer at the end of every six months (by December 31, 2011, June 30, 2012, December 31, 2012, June 30, 2013, and December 31, 2013) a progress report summarizing the progress and milestones to date for installation of the permanent treatment system (FBBRs) for removal of TBA.
5. Submit a Pollution Prevention Plan (PPP) workplan, with the time schedule for

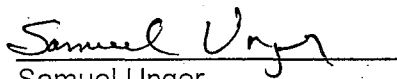
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implementation, for approval of the Executive Officer within 180 days after the adoption of this TSO, pursuant to California Water Code section 13263.3.

6. All technical and monitoring reports required under this TSO are required pursuant to California Water Code sections 13267 and 13383. The Regional Water Board needs the required information in order to determine compliance with this TSO and Order No. R4-2011-0095. The Regional Water Board believes that the burdens, including costs, of these reports bear a reasonable relationship to the needs for the reports and the benefits to be obtained from the reports.
7. If SFPP fails to comply with any provisions of this TSO, the Regional Water Board may take any further action authorized by law. The Executive Officer, or his/her delegee, is authorized to take appropriate administrative enforcement action pursuant, but not limited to, California Water Code sections 13323, 13350, and 13385. The Regional Water Board may also refer any violations to the Attorney General for judicial enforcement, including injunction and civil monetary remedies.
8. Any person signing a document submitted under this TSO shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 fine and imprisonment for knowing violations."
9. All other provisions of NPDES Order No. R4-2011-0095 not in conflict with this TSO are in full force and effect.
10. This TSO expires on December 31, 2013.

I, Samuel Unger, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on June 2, 2011.


Samuel Unger
Executive Officer