



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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Arnold Schwarzenegger
Governor

February 6, 2007

Mr. Jeffrey R. Becker
Becker Group
P. O. Box 23277
Ventura, CA 93002

UNDERGROUND STORAGE TANK PROGRAM - WORKPLAN FOR INJECTION OF MODIFIED FENTON'S REAGENT AND MODIFICATION TO WASTE DISCHARGE REQUIREMENTS MONITORING AND REPORTING PROGRAM NO. C1-8144 FORMER DIXIE DIESEL FACILITY, 6417 VENTURA BOULEVARD, VENTURA, CALIFORNIA (C-95139) (USTCF No. 4309) (B-1)

Dear Mr. Becker:

We have received the documents entitled "Groundwater Monitoring and Sampling Report," dated December 1, 2006 and "Workplan to Conduct Installation of Temporary Fenton's Reagent Injection Wells," (Workplan) dated January 8, 2007, prepared by your consultant, Applied Environmental Technologies Inc. (AET), for the above-referenced site.

AET has been injecting Fenton's Reagent into existing wells GW-1 through GW-3, MW-4, MW-5, NW-7 H-2 and H5 since June 2006. In order to further reduce the concentrations of groundwater contaminants effectively, AET proposes to inject Fenton's Reagent into 20 proposed shallow injection wells at the site. The total depth of the wells are approximately 4.5 feet below ground surface. AET will perform the injection on a daily basis for a period of approximately one week. We concur with AET's Workplan, provided the following conditions are met:

1. AET is required to comply with the General Waste Discharge Requirements (R4-2002-0030, Series No. 54) permit issued to you on February 1, 2005.
2. Well installation permits must be obtained from City of Ventura prior to starting the work.
3. AET proposes to inject 10% solution of modified Fenton's Reagent into the wells. AET is required to monitor field parameters such as temperature and groundwater elevation during the injection.
4. Due to the new proposed injection, the groundwater monitoring network of the Monitoring and Reporting Program No. CI-8814 shall be modified. A revised Monitoring and Reporting Program No. CI-8814 is enclosed. The following shall constitute the monitoring program for wells: upgradient well MW-3, downgradient well MW-7, and cross-gradient wells MW-4 and MW-5. Wells that are used for groundwater monitoring purpose shall not be used as injection wells for Fenton's Reagent.

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5. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to subsurface investigation including well installation must be conducted by, or under the direct responsible supervision of, a licensed California Professional Geologist (PG) or Civil Engineer (PE). All technical documents submitted to this Regional Board must be reviewed and signed and/or stamped by a licensed California PG or PE with at least five years subsurface hydrogeologic experience.
6. All reports submitted to this office must conform to the "Guidelines for Report Submittals," (June 1993) published by the Los Angeles County Department of Public Works.
7. Groundwater samples must be analyzed by Cal-LUFT GC/FID or Cal-LUFT GC/MS Method for total petroleum hydrocarbons as gasoline (TPH_G), and by EPA Method 8260B for the full suite of VOCs, benzene, toluene, ethylbenzene, total xylenes (BTEX), and fuel oxygenate compounds including MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and TBA. Ethanol is also required and shall be analyzed by either method above. The analytical detection limits must conform to the Regional Board General Laboratory Testing Requirements (9/06) (www.waterboards.ca.gov/losangeles/html/lab_report.html). If the site has a waste oil tank, all aromatic and chlorinated volatile organic compounds must also be analyzed and reported per EPA Method 8260B. All respective analytical methods must be certified by the California Environmental Laboratory Accreditation Program (ELAP). All analytical data must be reported by a California-certified laboratory.
8. During field work, field personnel must follow the site-specific Health and Safety plan previously submitted for the site.
9. Please notify us at least five working days so that we may schedule a staff to be present during field work.

You are required to submit a technical report documenting the field activities and results of Fenton's Reagent injection by **May 1, 2007**. Your next groundwater monitoring report is due by **April 15, 2007**.

If you have any questions, please contact Mr. Jay C. Huang at (213) 576-6711 or send him an email at jhuang@waterboards.ca.gov.

Sincerely,

Original Signed by
Jonathan S. Bishop
Executive Officer

Enclosure: Revised Monitoring and Report Program CI-8814

California Environmental Protection Agency



Mr. Jeffrey Becker
Former Dixie Diesel Site

-3-

February 6, 2007

cc: Yvonne Shanks, State Water Resources Control Board, Underground
Storage Tank Cleanup Fund
Doug Beach, Ventura County Environmental Health Division
Scott Sankey, Applied Environmental Technologies

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