



California Regional Water Quality Control Board

Los Angeles Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losAngeles>

Arnold Schwarzenegger
Governor

September 26, 2005

Mr. Brian Johnson
City of Santa Monica
Environmental Programs Division
200 Santa Monica Pier, Suite C
Santa Monica, CA 90401-3126

**GENERAL WASTE DISCHARGE REQUIREMENTS COVERAGE FOR PROPOSED OZONE SPARGING TO GROUNDWATER (ORDER NO. R4-2005-0030) (SERIES NO. 027)
SANTA MONICA MUNICIPAL BUS MAINTENANCE FACILITY, 1620 SIXTH STREET, SANTA MONICA, CA (ID# 904010043) (CI NO. 8960)**

Dear Mr. Johnson:

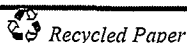
We have received documents entitled "Remedial Action Plan Addendum", and "Application for General Waste Discharge Requirements Permit", dated July 21, 2005, submitted by ICF Consulting, on behalf of City of Santa Monica (CSM), to clean up the hydrocarbons and methyl tertiary butyl ether (MTBE) contamination at the subject site.

The site is currently used as a Santa Monica Municipal Bus Line (SMMBL) maintenance yard for the City of Santa Monica (CSM). Four 20,000-gallon diesel and one 10,000-gallon gasoline tanks were located onsite at the northwest of the property. As a result of leaks from former underground storage tanks (USTs), the groundwater is impacted with petroleum hydrocarbons, primarily diesel fuel, and MTBE. Free product is also present in two groundwater monitoring wells (MW-2 and MW-28). The MTBE plume is located in the area south of the former UST area.

A total of 27 groundwater monitoring wells have been installed. Laboratory analytical results of groundwater samples collected from the onsite wells in the Second Quarter 2005 indicated that maximum concentrations of benzene, MTBE, tertiary butyl alcohol (TBA) were 1,800 µg/L, 39 µg/L and 1.4 µg/L, respectively.

Since 1999, CSM's consultant, ICF consulting (ICF), has installed and operated a groundwater extraction system and treated approximately 23,210,623 gallons of groundwater from four extraction wells (MW04, MW05, MW17B and MW18B). Since 2000, ICF has operated a bioventing system, injecting up to five cubic feet per minute of air into the wells and injection galleries at the site. The bioventing process provides oxygen to stimulate the aerobic degradation of petroleum hydrocarbons in subsurface. On May 11, 2004, CSM applied and received a permit for General Waste Discharge Requirements (Order No. R4-2002-0030, Series No. 49) to inject Oxygen Release Compound (ORC) into the groundwater for in-situ bioremediation to contain the offsite migration of MTBE plume from the subject site to the south.

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In July, 2005, ICF submitted a Remedial Action Plan Addendum (RAPA) and a Waste Discharge Requirement Permit Application to the Regional Board. ICF proposed to install an ozone sparging system. The proposed ozone sparging system will include approximately 20 1-inch diameter injection wells (AS1 through AS20) installed approximately 75 feet below ground surface (bgs). Regional Board staff have reviewed and approved the RAPA and the installation of the ozone-sparging system with the condition that ozone sparging shall not be conducted at wells AS4, AS5, AS8, AS9 until the free product from well MW2 is completely removed.

Regional Board staff have determined that the proposed discharge meets the conditions specified in Regional Board Order No. R4-2005-0030, "*General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel and/or Volatile Organic Compound Impacted Sites*," adopted by this Regional Board on May 5, 2005.

Enclosed are Waste Discharge Requirements, Order No. R4-2005-0030, and Monitoring and Reporting Program No. CI-8960.

The "Monitoring and Reporting Program" requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2005-0030. Your first monitoring report is due to this Board two months after the injection. All monitoring reports should be sent to the Regional Board, ATTN: Information Technology Unit.

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to "Compliance File No. CI-8960," which will assure that the reports are directed to the appropriate file and staff. Also, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

We are sending a copy of Order No. R4-2005-0030 only to the applicant. A copy of the Order will be furnished to anyone who requests it.

If you have any questions, please contact Mr. Rodney Nelson at (213) 620-6119.

Sincerely,



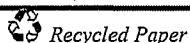
Jonathan A. Bishop
Executive Officer

Enclosures

Board Order No. R4-2005-0030
Monitoring and Reporting Program No. CI-8960

Cc: Yvonne Shanks, State Water Resources Control Board, Underground
Storage Tank Cleanup Fund(w/o Board Order No. R4-2005-0030)
Scott Broten, ICF Consulting

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