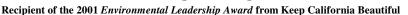


California Regional Water Quality Control Board

Los Angeles Region





Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger Governor

August 1, 2006

Mr. Randy Eastman Margaret Gail Eastman Trust 2001 Donner Bay Lake Havasu City, AZ 86406

GENERAL WASTE DISCHARGE REQUIREMENTS FOR HYDROGEN PEROXIDE SOLUTION INJECTION AT PETROLEUM HYDROCARBON FUEL AND/OR VOLATILE ORGANIC COMPOUND IMPACTED SITES – BUG CITY/STUDIO EXPRESS, 300 SOUTH LA CIENEGA BOULEVARD, LOS ANGELES, CALIFORNIA (FILE NO. 900480143, CI-9134, ORDER NO. R4-2005-0030, SERIES NUMBER NO. 051)

Dear Mr. Eastman:

We have completed our review of your application for coverage under the General Waste Discharge Requirements for the injection of hydrogen peroxide solution at the site referenced above in Los Angeles, California.

Margaret Gail Eastman Trust (hereinafter Discharger) is conducting the soil and groundwater cleanup activities at a facility commonly known as Bug City/Studio Express site (Site) located at 300 South La Cienega Boulevard, Los Angeles, California. Margaret Gail Eastman Trust owns the property. The Site contains a paved yard area and a building formerly used for automotive rental and service. Site investigations indicate that soil and groundwater have been contaminated with petroleum hydrocarbons. The maximum concentrations of total petroleum hydrocarbon as gasoline (TPHg), benzene, and methyl tertiary butyl ether (MTBE) were detected in soil at 10,500 mg/kg, 71.8 mg/kg, and 2.32 mg/kg, respectively. The maximum concentrations of TPHg, benzene, MTBE, and TBA were recently detected in groundwater at 36,900 μg/L, 2,980 μg/L, 330 μg/L, and 794 μg/L, respectively.

The site is located within the west-central portion of the Los Angeles Basin. The Los Angeles Basin lies between the Pacific Ocean to the southwest, the Santa Monica Mountains to the west, and the San Gabriel Mountains to the north. Los Angeles Basin contains a thick sequence of marine sedimentary deposits of Pliocene and Miocene age. The Site is situated on an area adjacent to the Hollywood Basin, Santa Monica Basin, and the northwestern portion of the Los Angeles Forebay Area. Known aquicludes and aquifers below the Site include Holocene alluvial materials underlain by the San Pedro Formation. The Ballona aquifer (a perched aquifer) that extends to a maximum depth of 70 feet below ground surface consists of 30-50 feet of gravel and coarse sand. Groundwater used for drinking water in the Central Basin comes from the Silverado Aquifer, located approximately 550 to 600 feet below ground surface (bgs). Base upon groundwater monitoring results for the First Quarter 2006, the depth to groundwater ranges from approximately 21 ft to 26 ft bgs. The groundwater flow direction was measured towards the southwest. There is one production well (CBH-2) located 5,215 ft from the Site.

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On February 2, 2006, Padre submitted a "Addendum to Remedial Action Plan (ARAP)" to this Regional Board and approved by this Regional Board on February 24, 2006. In the ARAP, Padre proposed to conduct additional remediation by using combination of the HVDPE and injection of hydrogen peroxide (<10% solution). Hydrogen peroxide solution will be added to wells MW-1R, MW-2R, EW-5, EW-6 and MW-9 during the completion of HVDPE activities. Upon completion of each 15-day HVDPE event, hydrogen peroxide solution will be added to each of the four groundwater extraction wells (MW-3R, EW-4, EW-7 and MW-8). Padre proposed to use four existing wells (MW-10 through MW-13) as the monitoring wells.

Any potential adverse water quality impacts that may result shall be localized, of short-term duration, and shall not impact any existing or prospective uses of groundwater.

Regional Board staff have determined that the proposed discharge meets the conditions specified in 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 your Waste Discharge Requirements, consisting of Regional Board Order No. R4-2005-0030 (Series No. 051) and Monitoring and Reporting Program No. CI-9134 and Standard Provisions.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment (August 1, 2006) under Regional Board Order No. R4-2005-0030. You are required to utilize five hydropunch points (one between MW-3R and EW-4, one between EW-5 and MW-9, one between EW-5 and EW-6, one near EW-7, and one near MW-8) as injection points dedicated to the introduction of the hydrogen peroxide in order to meet the conditions specified in Order No. R-4-2005-0030 for the proposed project. The existing monitoring wells shall not be used as injection points. All monitoring reports shall be sent to the Regional Board, <u>ATTN: Information Technology Unit.</u>

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9134, which will assure that the reports are directed to the appropriate file and staff. 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,

ORIGINAL SIGNED BY

Jonathan S. Bishop Executive Officer

Enclosures: 1. Board Order No. R4-2005-0030

California Environmental Protection Agency

Margaret Gail Eastman Trust

2. Monitoring and Reporting Program No. CI-9134

cc: Ms. Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank Cleanup Fund

Ms. Nancy Mastumoto, Water Replenishment District of Southern California Captain Frank Comfort, Los Angeles City Fire Department, Underground Tanks Ms. Valerie Toney, Los Angeles City Fire Department, Underground Tanks

Mr. Philip Barbaro, Jr., Palemo, Barbaro, Chinen & Pitzer

Mr. Joseph P. Schaaf, Padre Associates, Inc.