



# California Regional Water Quality Control Board

## Los Angeles Region



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

**Linda S. Adams**  
Agency Secretary

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**Arnold Schwarzenegger**  
Governor

November 7, 2006

Mr. Tim Strawn  
ExxonMobil Oil Corporation  
Remedial Engineering  
3700 West 190<sup>th</sup> Street, TPT-2  
Torrance, CA 90509

**GENERAL WASTE DISCHARGE REQUIREMENTS COVERAGE FOR PROPOSED INJECTION OF FENTON'S REAGENT TO GROUNDWATER (ORDER NO. R4-2005-0030) (SERIES NO. 062)  
FORMER MOBIL STATION #18-LDM, 12054 WILSHIRE BOULEVARD, LOS ANGELES (File No. #900250070) (CI NO. 9200)**

Dear Mr. Strawn:

We have received the document entitled "Application for General Waste Discharge Requirements Permit", dated August 9, 2006, submitted by Worley Parsons Komex (Komex), on behalf of ExxonMobil Oil Corporation (ExxonMobil) at the site.

A Shallow Aquifer pump-and-treat system has been in operation at the site from October 1997 until November 2005 and removed approximately 180 pounds of methyl tertiary butyl ether (MTBE) from the Shallow Aquifer. The Lower Aquifer Remediation System was operated from March 2000 until December 2004 and removed approximately 50 pounds of MTBE from the Lower Aquifer. The Production Aquifer Remediation System operated from May 2000 through April 2004 and removed approximately 0.51 pounds of MTBE. The current maximum MTBE concentrations in the Shallow Aquifers are less than 6.5 ug/L. MTBE was not detected in all wells from the Production and Lower Aquifers.

Based on the groundwater monitoring data of August 2006, benzene was not detected in both Shallow and Production Aquifers. Total petroleum hydrocarbons as gasoline (TPHg) and benzene were detected up to 690 ug/L and 3.13 ug/L, respectively, in well MW-25B1 of the Lower Aquifer.

On August 8, 2006, Komex submitted a Workplan for In-Situ Chemical Oxidation and proposes to inject Fenton's reagent (10% by weight) into well MW-25B to reduce the TPHg and benzene concentrations detected in well MW-25B1. Well MW-25B is screened from 65 to 85 feet below ground surface (bgs) and well MW-25B1 is screened from 89 to 94 feet bgs. Groundwater level was at approximately 79 feet bgs. Well MW-25B will be used as an injection well and well MW-25B1 will be used to monitor the results of injection. Because the well is situated south of a fault, no upgradient well will be needed for monitoring the progress of injection. The Workplan was approved by the Regional Board staff on September 12, 2006.

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Mr. Tim Strawn  
ExxonMobil Oil Corporation

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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.

The "Monitoring and Reporting Program" requires ExxonMobil to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2005-0030. ExxonMobil' 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-9200" 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,

***Original Signed by***  
Jonathan A. Bishop  
Executive Officer

Enclosures

Board Order No. R4-2005-0030  
Monitoring and Reporting Program No. CI-9200

cc: Steven Linder, United States Environmental Protection Agency Region IX  
Chi Diep, Drinking Water Field Operations, State Department of Health Services  
Frank Comfort, Los Angeles City Fire Department, Underground Tank Unit  
Joseph Lawrence, Assistant City Attorney, City of Santa Monica  
Barry Groveman, Special Environmental Counsel for City of Santa Monica  
Craig Perkins, Environmental & Public Works, City of Santa Monica  
Gil Balboa, Utilities Engineer, City of Santa Monica  
Lisette Bauersachs, Utilities Division, City of Santa Monica  
Robert Harvey, City of Santa Monica, Arcadia Water Treatment Plant  
Andy Gray, WorleyParsons Komex

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