



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Secretary for  
Environmental Protection

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<http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

February 16, 2010

Mr. Steve Lippman  
Lippman Realty Partners  
1021 Hilts Avenue  
Los Angeles, CA 90024

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES— FORMER WENDY ARCO, 2750 CAMINO DOS RIOS, NEWBURY PARK (ORDER NO. R4-2007-0019; CI NO. 9219)**

Dear Mr. Lippman:

We have completed our review of your application for coverage under the General Waste Discharge Requirements to inject Sodium Persulfate at the site referenced above for groundwater cleanup and remediation.

Multiple phases of assessment have been conducted since 1992, which included the advancement of twenty five soil borings and the installation of fifteen groundwater monitoring wells. Since the USTs removal in 1992, four different phases of remediation have occurred, including a high-vacuum, dual-phase extraction system from 2006 to 2008, which was shut off after vapor-removal curves had reached the asymptotic levels.

In July/August 2009, a Hydraulic Conductivity Probe/Membrane Interface Probe (HPT/MIP) was conducted to assess the residual contamination. It appears the majority of the contamination lies below the groundwater surface in the vicinity and down-gradient of the former location of the USTs, extending from 26 to 43 feet below ground surface. Dissolved hydrocarbon components TPHg, BETX and DIPE were detected up to 9,600, 11,764 and 440 µg/L respectively in November 2009. To remediate the residual contaminants in the groundwater beneath the site, your consultant, Winfield & Associates, Inc., proposes, through the "Remedial Action Plan Addendum" dated November 9, 2009, to conduct a pilot study using Sodium Persulfate to evaluate the feasibility of the technology to remediate the residual subsurface hydrocarbons in groundwater. Two injection locations using a direct push rig (P-1 & P-2, see Figure 7) are currently proposed for a pilot study.

Regional Board staff has determined that the proposed discharge meets the conditions specified in Order No. R4-2007-0019, "Revised General Waste Discharge Requirements for Groundwater Remediation At Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Sites (General WDRs)," adopted by the Los Angeles Regional Water quality Control Board on March 1, 2007.

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019 and Monitoring and Reporting Program No. CI-9219 and Standard Provisions. This Waste Discharge Requirements shall not be terminated without the regulatory oversight agency's prior approval.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2007-0019. All monitoring reports shall 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-9219, 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.

To avoid paying future annual fees, please submit written request for termination of your enrollment under the general permit in a separate letter when your project has been completed and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

We are sending a copy of Order No. R4-2007-0019 only to the applicant. A copy of the Order will be furnished to anyone who requests it, or on line at:  
[http://www.waterboards.ca.gov/losangeles/board\\_decisions/adopted\\_orders/general\\_orders/r4-2007-0019/r4-2007-0019.pdf](http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf)

If you have any questions, please contact Dr. Rebecca Chou at (213) 620-6156 for WDRs administration matters, or Mr. Gregg Kwey at (213) 576-6702 for technical matters.

Sincerely,

  
Tracy J. Egoscue  
Executive Officer

Enclosures:    1.    Board Order No. R4-2007-0019  
                  2.    Standard Provisions for Reporting and Monitoring  
                  3.    Monitoring and Reporting Program No. CI-9219

cc:                Mr. David Salter, Ventura County Division of Environmental Health  
                      Mr. Mike Cassidy, Winfield & Associates, Inc.

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI—9219

FOR

FORMER WENDY ARCO  
2750 CAMINO DOS RIOS, NEWBURY PARK

(SODIUM PERSULFATE INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4-2007-0019, SERIES NO. 118)

I. REPORTING REQUIREMENTS

- A. Lippman Realty Partners (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for January to June 2010, shall be received at the Regional Board by July 15, 2010. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 15
July – December	January 15

If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

- B. By March 1<sup>st</sup> of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall explain the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements (WDRs).
- C. Laboratory analyses—all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.
- D. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can

demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.

- E. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.
- F. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- G. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.
- H. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- I. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.
- J. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.
- K. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. SODIUM PERSULFATE INJECTION MONITORING REQUIREMENTS

The Semi-Annually reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the Sodium Persulfate injection. Two injection locations using a direct push rig (P-1 & P-2, see Figure 7) are currently proposed for a pilot study. Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration. Additional injection points should be reviewed and approved by the County of Ventura, Environmental Health Division (VCEHD) and Regional Board prior to implementations.
2. Written and tabular summary defining the quantity of Sodium Persulfate injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from one down-gradient monitoring wells GW-8; three source area monitoring well GW-6, -9, -13; and one up-gradient monitoring wells GW-14 on a semi-annual basis to monitor the effectiveness of the in-situ groundwater remediation. Additional monitoring wells for full scale implementation may be required if VCEHD and Regional Board deemed they are necessary. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	• Semi-Annually <sup>1</sup>
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-Annually <sup>1</sup>
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Semi-Annually <sup>1</sup>

Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually <sup>1</sup>
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually <sup>1</sup>
Oxidation-reduction potential	milivolts		• Semi-Annually <sup>1</sup>
Dissolved Oxygen	µg/L	Grab	• Semi-Annually <sup>1</sup>
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually <sup>1</sup>
Total Chromium and chromium six <sup>2</sup>	µg/L	Grab	• Semi-Annually <sup>1</sup>
PH	pH units	Grab	• Semi-Annually <sup>1</sup>
Temperature	°F/°C	Grab	• Semi-Annually <sup>1</sup>
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually <sup>1</sup>

<sup>1</sup> One week before injection and Semi-Annually thereafter

<sup>2</sup> The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth Semi-Annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored Semi-Annually thereafter.

All groundwater monitoring reports must include, at a minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Semi-Annually observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

IV. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Executive Officer if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 a fine and imprisonment.

Executed on the \_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_.

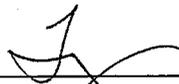
\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Title)"

VI. PUBLIC DOCUMENTS

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:

  
\_\_\_\_\_  
Tracy J. Egoscue  
Executive Officer

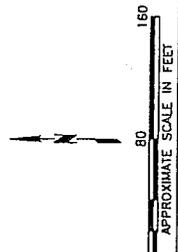
Date: February 16, 2010

**LEGEND**

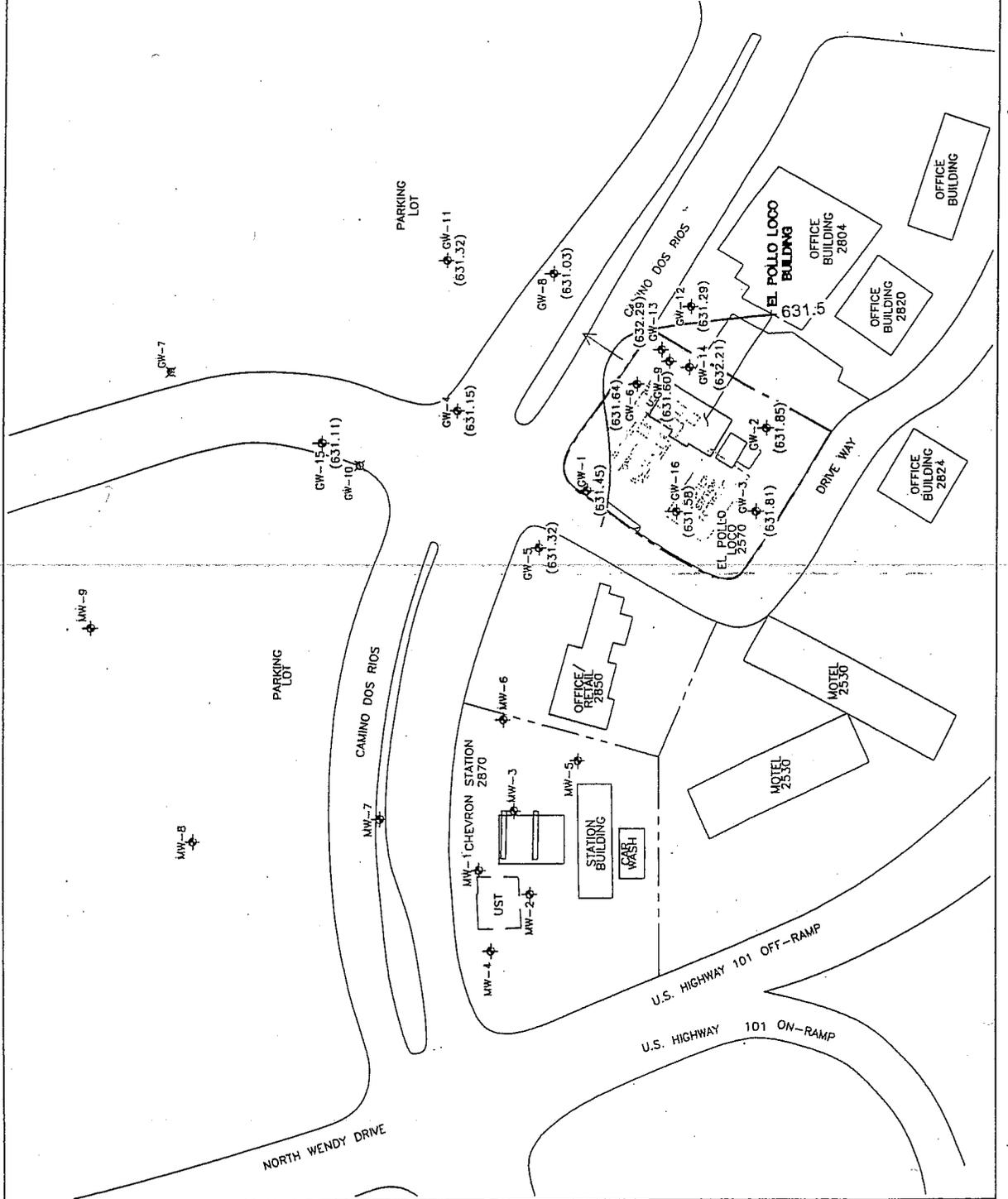
- APPROXIMATE SITE PROPERTY LINE
- GW-15  GROUNDWATER MONITORING WELL LOCATION
- GW-10  ABANDONED MONITORING WELL LOCATION
- (632.29)  GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (MSL)
- GROUNDWATER ELEVATION CONTOUR (MSL)
- GROUNDWATER CONTOUR INTERVAL = 0.50
- GROUNDWATER FLOW DIRECTION

**NOTES:**

1. SOURCE OF MAP: BASED FROM HOLGUIN, FAHAN AND ASSOC., INC. MAP DATED JUNE 16, 2001. SITE FEATURES ADDED USING GEOREFERENCED SATELLITE IMAGERY FROM GOOGLE EARTH, COPYRIGHT 2007. NOT A SURVEYED MAP.
2. GROUNDWATER MONITORING WELL LOCATIONS SURVEYED BY WM HOLDINGS INC. ON FEBRUARY 13, 2003, SEPTEMBER 24, 2007 AND OCTOBER 22, 2009.
3. FORMER SITE FEATURE LOCATIONS ARE APPROXIMATE.
4. COORDINATED GROUNDWATER MONITORING IS NO LONGER REQUIRED WITH NEARBY CHEVRON SITE.



	
<b>WINEFIELD &amp; ASSOCIATES, INC.</b> ENVIRONMENTAL AND SAFETY CONSULTANTS	
DESCRIPTION	GROUNDWATER ELEVATION CONTOUR MAP
PROJECT	LIPPMAN NEWBURY PARK EL POLLO LOCO RESTAURANT
LOCATION	2750 CAMINO DOS RIOS NEWBURY PARK, CALIFORNIA
DRAWN BY	LRP-09-098
DATE	12/09
FIGURE NO. 2	

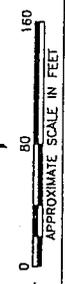


**LEGEND**

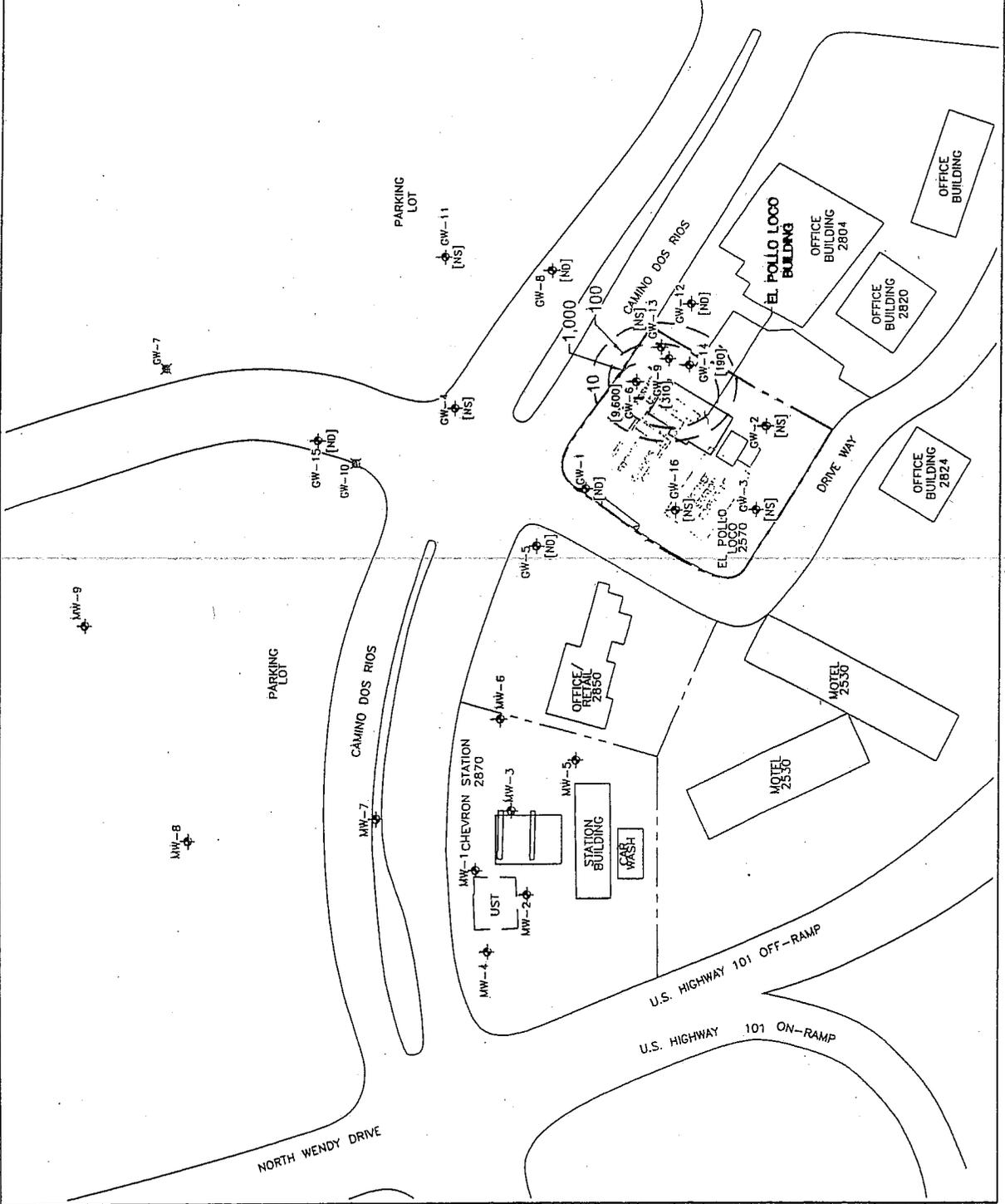
- APPROXIMATE SITE PROPERTY LINE
- ◆ GROUNDWATER MONITORING WELL LOCATION
- ⊗ ABANDONED MONITORING WELL LOCATION
- [9,600] TOTAL PETROLEUM HYDROCARBONS AS GASOLINE CONCENTRATION (ug/L) (8015M)
- [NS] TOTAL PETROLEUM HYDROCARBONS AS GASOLINE ISOCONCENTRATION CONTOUR WITH 195/L (DASHED WHERE INFERRED)
- - - NOT DETECTED
- [NS] NOT SAMPLED

**NOTES:**

1. SOURCE OF MAP: BASED FROM HOLGUIN, FAHAN AND ASSOC., INC. MAP DATED JUNE 16, 2001. SITE FEATURES ADDED USING GEOREFERENCED SATELLITE IMAGERY FROM GOOGLE EARTH, COPYRIGHT 2007. NOT A SURVEYED MAP.
2. GROUNDWATER MONITORING WELL LOCATIONS SURVEYED BY WIA HOLDINGS, INC. ON FEBRUARY 13, 2003, SEPTEMBER 24, 2007 AND OCTOBER 22, 2009.
3. FORMER SITE FEATURE LOCATIONS ARE APPROXIMATE.
4. COORDINATED GROUNDWATER MONITORING IS NO LONGER REQUIRED WITH NEARBY CHEVRON SITE.



	<b>WINEFIELD &amp; ASSOCIATES, INC.</b> ENVIRONMENTAL AND SAFETY CONSULTANTS
	DESCRIPTION TPHg ISOCONCENTRATION MAP (NO PURGE SAMPLES)
	PROJECT LIPPMAN NEWBURY PARK EL POLLO LOCO RESTAURANT
	LOCATION 2750 CAMINO DOS RIOS NEWBURY PARK, CALIFORNIA
JOB NO. LRP-09-098	DATE 12/09
FIGURE NO. 3	

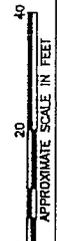


**Legend**

- APPROXIMATE SITE PROPERTY LINE
- GROUNDWATER MONITORING WELL LOCATION BY LINDMARK ENGINEERING (1989, 1990, 1992)
- AIR SPARGE/SOIL VAPOR EXTRACTION WELL LOCATION
- HYDROPUNCH SOIL BORING LOCATION
- GROUNDWATER SAMPLING LOCATION USING A GEOPROBE
- VADOSE ZONE MONITORING WELL LOCATION BY LINDMARK ENGINEERING (1986)
- RISK ASSESSMENT SOIL BORING LOCATION BY WINEFIELD AND ASSOCIATES (8/98)
- SOIL BORING LOCATION BY LINDMARK ENGINEERING (5/89 AND 12/92)
- MONITORING PROBE BY LINDMARK ENGINEERING (5/95)
- SOIL SAMPLE COLLECTED BY LINDMARK ENGINEERING FROM BENEATH FORMER UNDERGROUND STORAGE TANK (7/92)
- SOIL SAMPLE COLLECTED BY LINDMARK ENGINEERING FROM BENEATH FORMER FUEL DISPENSER (7/92)
- AIR SPARGE WELL LOCATION BY LINDMARK ENGINEERING (5/95)
- VAPOR EXTRACTION/AQUIFER TEST WELL LOCATION BY LINDMARK ENGINEERING (5/95)
- MIP BORING LOCATION
- HPT BORING LOCATION
- PROPOSED PIEZOMETER LOCATION
- PROPOSED ACTIVATED SODIUM PERSULFATE INJECTION LOCATION
- PROPOSED BOD SAMPLE LOCATION

**Notes:**

1. SOURCE OF MAP: BASED ON HOLCUI, FAHAN AND ASSOCIATES, INC. MAP DATED JUNE 15, 2007. DATA ADDED USING GEOREFERENCED SATELLITE IMAGES FROM GOOGLE EARTH. COPYRIGHT 2008. NOT A SURVEYED MAP.
2. GROUNDWATER MONITORING WELL LOCATIONS SURVEYED BY WM HOLDINGS INC., ON FEBRUARY 13, 2003 AND SEPTEMBER 24, 2007.
3. FORMER SITE FEATURE LOCATIONS ARE APPROXIMATE.



<b>WINEFIELD &amp; ASSOCIATES, INC.</b> ENVIRONMENTAL AND SAFETY CONSULTANTS	
OPERATION	DETAIL SITE MAP SHOWING PROPOSED INJECTION LOCATIONS
PROJECT	LIPPMAN NEWBURY PARK EL FOLLO LOCO RESTAURANT
LOCATION	2750 CAMINO DOS RIOS NEWBURY PARK, CALIFORNIA
DATE	11/09
PROJECT NO.	LRP-09-100
DRAWING NO.	7

