

Agency Secretary

California R Jional Water Quality Ontrol Board

Los Angeles Region

Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

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Arnold Schwarzenegger

April 9, 2007

Ms. Shari London ConocoPhillips Company 3611 South Harbor Blvd., Suite 200 Santa Ana, CA 92704

Dear Ms. London:

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND And/OR HEXAVALENT CHROMIUM IMPACTED SITES — 2292 THOMPSON BOULEVARD, VENTURA (ORDER NO. R4-2007-0019, SERIES NO. 004; CI NO. 9235)

We have completed our review of your application for coverage under General Waste Discharge Requirements to inject non-hazardous ozone at the site referenced above in Ventura, California for groundwater cleanup and remediation.

Since February 1989, various subsurface investigations and remediation activities have been conducted at the subject site subsequent to the tank removal and replacement, which consisted of drilling and sampling numerous soil borings, installing ten groundwater monitoring wells, excavating contaminated soil, and conducting a high vacuum dual-phase extraction (HVDPE) pilot test. The analytical data from groundwater monitoring event conducted in third quarter 2005 indicated groundwater beneath the site was still impacted by TPHg (up to 120,000 μ g/L), Benzene (up to 17,000 μ g/L), and MTBE (up to 17,000 μ g/L). The groundwater was present at depths ranging from approximately 21.3 feet to 24.6 feet below the tops of the well casings and the groundwater flow direction was to the southwest with a hydraulic gradient of 0.007 feet/foot.

Four remedial alternatives have been reviewed for clean up the soil and groundwater contaminations beneath the site: 1) Monitored natural attenuation, 2) Soil excavation and monitored natural attenuation, 3) Dual phase extraction, and 4) Vapor extraction and ozone injection. Based on an evaluation of current Site conditions and previous remediation activities and pilot testing, it is concluded that soil vapor extraction and ozone sparging represent a cost-effective method to mitigate the petroleum hydrocarbon impacted soil and groundwater beneath the Site. Therefore, the Discharger proposes to conduct ozone sparging to remediate adsorbed-phase petroleum hydrocarbons submerged beneath the groundwater surface and dissolved-phase petroleum hydrocarbons in groundwater.

A letter dated June 27, 2006 from Ventura County Division of Environmental Health approved Workplan for Remediation Pilot Testing dated April 17, 2006, and its Supplement dated June 19, 2006, for the injection of ozone to remediate impacted groundwater beneath the subject site.

California Environmental Protection Agency

Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration.

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 State Water Resources 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-9235 and Standard Provisions.

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-9235, 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. R4-2007-0019 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/html/permits/gen_orders/R4-2007-0019/R4-2007-0019.pdf

If you have any questions, please contact Mr. Rod Nelson at (213) 576-6119.

Sincerely.

Jonathan S. Bishop **Executive Officer**

Enclosures: 1. Board Order No. R4-2007-0019

2. Monitoring and Reporting Program No. Cl-9235

CC:

Mr. David Salter, Ventura County Division of Environmental Health

Mr. Wayne Mazie, ATC Associates., Inc.