California Regional Water Quality Control Board

Los Angeles Region

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Linda S. Adams

Agency Secretary

Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful
320 W. 4th Street, Suite 200, Los Angeles, California 90013

Arnold Schwarzenegger

October 10, 2007

Mr. George Tash Somis Supply 5777 Balcom Canyon Road Somis. CA 93066

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES SOMIS SUPPLY 5394 LOS ANGELES AVENUE, SOMIS (ORDER NO. R4-2007-0019, SERIES NO. 035; CI NO. 9319)

Dear Mr. Tash:

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

Since March 2000, various subsurface investigations have been conducted at the subject site subsequent to the tank removal, which consisted of drilling and sampling numeral soil borings, installing eleven groundwater monitoring wells (MW-1 to MW-11). The analytical data from groundwater monitoring event conducted in February 2007 indicated groundwater beneath the site was still impacted by TPHg (up to 26,700 μ g/L) and BTEX (up to 6,197 μ g/L). The Groundwater flow direction underneath the site was to the south at a gradient from approximately 0.004 to 0.008 feet/foot.

To remediate groundwater contaminations, you have proposed in the Corrective Action Plan for Remediation of Gasoline-Impacted Soil and Groundwater dated January 23, 2007, to pump-and-treat the contaminated groundwater and re-inject the treated groundwater back into groundwater formation. Contaminated groundwater is to be extracted through 5 new groundwater extraction wells (DW-1 through DW-5) and pumped through beds of activated carbon. The treated groundwater will then be routed to 2 up-gradient wells (GRW-1 and GRW-2) for reinjection (please refer to Monitoring & Reporting Program No. CI-9319, Plate 2). If further treatment is needed, Fenton's Reagent, which is composed of hydrogen peroxide with trace amount of hydrochloric acid and ferrous sulfate, will be injected into groundwater aquifer via eight injection locations (IW-1 to IW-8) on-site (please refer to Monitoring & Reporting Program No. CI-9319, Plate 6).

California Environmental Protection Agency

A letter dated April 10, 2007 from Ventura County Division of Environmental Health approved the Corrective Action Plan.

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-9319 and Standard Provisions.

The WDRs issued shall not be rescinded until Ventura County Division of Environmental Health staff determine the WRDs are no longer needed for the site cleanup.

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-9319, 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 or Mr. Gregg Kwey at (213) 576-6702.

Sincerely,

Tracy J. Egósque Executive Officer

- Enclosures: 1. Board Order No. R4-2007-0019
 - 2. Monitoring and Reporting Program No. CI-9319

CC:

Mr. David Salter, Ventura County Division of Environmental Health

Mr. Emanuel Pedram, AET, Inc.

STATE OF CALIFORNIA CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION MONITORING AND REPORTING PROGRAM NO. CI-9319 FOR

SOMIS SUPPLY

5394 LOS ANGELES AVENUE, SOMIS (TREATED GROUNDWATER RE-INJECTION) (ORDER NO. R4-2007-0019, SERIES NO. 035)

I. REPORTING REQUIREMENTS

A. Somis Supply (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 October-December 2007, shall be received at the Regional Board by January 15, 2008. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

| Monitoring Period | Report Due |
|-----------------------------------------------------|-----------------------------------|
| January – March April – June July – September | April 15 July 15 October 15 |
| October – December | January 15 |

- B. 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.
- C. By March 1st 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).
- D. 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

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copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.

- E. 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.
- F. 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.
- G. 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.
- H. 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.
- I. 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.
- J. 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.
- K. 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.

II. TREATED GROUNDWATER RE-INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding re-injection activities:

- 1. Location map showing re-injection points used for the treated groundwater. Groundwater monitoring wells shall not be used as re-injection points to avoid reduction of groundwater monitoring network, data bias. Up to two injection points, GRW-1 and GRW-2, are proposed that can be referenced in the attached Plate 2.
- 2. Written and tabular summary defining the quantity treated groundwater injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

| CONSTITUENT | CONSTITUENT UNITS TYPE OF SAMPLE | | MINIMUM FREQUENCY OF ANALYSIS |
|---------------------|----------------------------------|--|----------------------------------|
| Treated groundwater | gallons/day | | Quarterly |

III. FENTON'S REAGENT INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

- 1. Location map showing injection points, IW-1 to IW-8, used for the Fenton's Reagent (refer to attached Plate 6 for proposed injection locations). Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alternation.
- 2. Written and tabular summary defining the quantity of Fenton's Reagent injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

| CONSTITUENT | UNITS | TYPE OF SAMPLE | MINIMUM FREQUENCY OF ANALYSIS | |
|------------------------------------------------------|-----------|----------------|----------------------------------|--|
| Total Fenton's Reagent delivered per injection point | grams/day | | Quarterly | |

IV. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from groundwater monitoring wells MW-11 (up-gradient), MW-1 and MW-3R (source area), MW-5 and MW-8 (down-gradient) on a quarterly basis to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Plate 4). 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 | Baseline/Quarterly ¹ | |
| Benzene, Toluene, Ehylbenzene, Xylenes (BTEX) | µg/L | Grab | Baseline/Quarterly ¹ | |
| Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE) | μg/L | Grab | Baseline/Quarterly ¹ | |
| Ethanol Formaldehyde Acetone | μg/L | Grab | Baseline/Quarterly ¹ | |
| Total dissolved solids Boron Chloride Sulfate | mg/L | Grab | Baseline/Quarterly ¹ | |
| Oxidation-reduction potential | milivolts | | Baseline/Quarterly ¹ | |
| Dissolved Oxygen | μg/L | Grab | Baseline/Quarterly ¹ | |
| Dissolved ferrous iron | μg/L | Grab | Baseline/Quarterly ¹ | |
| Total Chromium and chromium six and Priority Pollutants ² | μg/L | Grab | Baseline/Quarterly ¹ | |
| PH . | pH units | Grab | Baseline/Quarterly ¹ | |
| Temperature | °F/°C | Grab | Baseline/Quarterly ¹ | |

Baseline analysis should be conducted prior to the start of treated groundwater reinjection; and Quarterly thereafter

The Discharger is required to monitor for total chromium and chromium six and any priority pollutants identified in Attachment I only when they are detected in the baseline test

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. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

V. 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.

VI. 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)" |

VII. 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

Order No. R4-2007-0019

Quality Control Board, Los Angeles Region.

Ordered by:

Tracy J. Egoscue Executive Officer Date: October 10, 2007