



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Los Angeles Regional Water Quality Control Board

January 10, 2014

Mr. Frank Nauman  
Tefferteller-Nauman Properties  
2295 Etting Road  
Oxnard, CA 93033

Certified Mail with Return Receipt  
7012 3460 0000 2166 3652

### **GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER REMEDIATION AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES--TEFFERTELLER-NAUMANN PROPERTIES, 2901 EAST MAIN STREET, VENTURA (ORDER NO. R4-2007-0019-051; CI NO. 9396)**

Dear Mr. Nauman:

Our letter of April 2, 2009 terminated the General Waste Discharge Requirements (WDR), Order No. R4-2007-0019-051, for a pilot test of ozone injection at the subject site (Site). In the same letter, we required you to apply for a WDR for full-scale remediation.

The groundwater monitoring conducted since February 2010 indicated the dissolved hydrocarbon plumes have not been stabilized by natural attenuation, with total petroleum hydrocarbons as gasoline, benzene, toluene, xylenes, methyl tertiary butyl ether and tertiary butyl alcohol detected, in November 2011, up to 321,000 µg/L, 14,700 µg/L, 25,400 µg/L, 20,350 µg/L, 125,000 µg/L and 68,000 µg/L, respectively.

A letter dated July 29, 2013, from your consultant, TRAK Environmental Group, Inc., contained an application for the coverage of the General Waste Discharge Requirements (R4-2007-0019) for your full-scale oxygen-releasing compounds (RegenOx™) injection operation at the Site.

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 WDR)," adopted by the Los Angeles Regional Water Quality Control Board on March 1, 2007.

Enclosed are your Waste Discharge Requirements, consisting of the General WDR R4-2007-0019, including the Revised Monitoring and Reporting Program No. CI-9396 and Standard Provisions. These Waste Discharge Requirements shall not be terminated without Regional Board UST staff's prior approval.

When submitting technical monitoring reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9396, 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.

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0611135205. To comply with the MRP under this WDR, you shall upload the WDRs monitoring reports to the Geotracker under the two Global ID T0611135205 and WDR1000013043. For more information regarding the new Global ID under WDRs, please see ESI training video available at:

<https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>.

To avoid paying future annual fees, please submit a 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.

If you have any questions, please contact Mr. Gregg Kwey at (213) 576-6702 or [kwey@waterboards.ca.gov](mailto:kwey@waterboards.ca.gov) for issues regarding underground storage tanks, or Dr. Eric Wu at (213) 576-6683 or [ewu@waterboards.ca.gov](mailto:ewu@waterboards.ca.gov) for issues regarding the WDR.

Sincerely,

  
Samuel Unger, P.E.  
Executive Officer

Enclosures:

1. General WDRs Order No. R4-2007-0019
2. Revised Monitoring and Reporting Program No. CI-9396

cc: Ms. Kathy Jundt, SWRCB, Underground Tank Cleanup Fund  
Mr. Hari Patel, SWRCB, Underground Tank Cleanup Fund  
Ms. Diane Wahl, Ventura County Division of Environmental Health  
Mr. Paul Salmonsens, TRAK Environmental Group, Inc.

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9396

FOR

TEFFERTELLER-NAUMANN PROPERTIES  
2901 EAST MAIN STREET, VENTURA

(REGENOX™ INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4-2007-0019, SERIES NO. 051)

I. REPORTING REQUIREMENTS

- A. Tefferteller-Naumann Properties (hereinafter Discharger) shall implement this revised monitoring program on the effective date of this Monitoring and Reporting Program (MRP). The first monitoring report under this program, for the period from the effective date of this MRP to June 30, 2014, shall be received at the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) by July 15, 2014. 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. Laboratory analyses—all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health 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.
- C. The method limits (MLs) employed for analytical 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 from the Regional Board.

- D. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 Code of Federal Regulation Part 136. All QA/QC samples must be run on the dates when samples are actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request from the Regional Board.
- E. Each monitoring report must affirm in writing that "All analyses are conducted at a laboratory certified for such analyses by the California Department of Public Health and in accordance with current United States Environmental Protection Agency guideline procedures, or as specified in this MRP." Proper chain of custody procedure must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- F. Each monitoring report shall contain a separate section entitled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that are needed to bring the discharge into full compliance with Waste Discharge Requirements (WDR). This section shall be located at the front of the report and shall clearly list all non-compliance with WDR, as well as all excursions of effluent limitations.
- G. 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.
- H. If the Discharger performs analyses on groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.
- I. 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.
- J. The Discharger should not implement any changes to the MRP prior to receiving the Executive Officer's written approval.
- K. In accordance with regulations adopted by the State Water Resources Control Board regarding electronic submittal of information, Underground Storage Tank Program (UST) monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0611135205. To comply

with the MRP under this WDRs, the Discharger shall upload the WDRs monitoring reports to the Geotracker system under the two Global ID T0611135205 and WDR1000013043.

II. RegenOx™ INJECTION MONITORING REQUIREMENTS

The reports shall contain the following information regarding injection activities:

1. Written and tabular summaries defining the quantity of RegenOx™ injected and a summary describing the days on which the injection system was in operation
2. Location map showing locations for RegenOx™ injection. Three injection locations (see Figure 2) within the treatment area are currently proposed. Additional locations are permitted with Regional Board concurrence. Additional injection locations shall be reviewed and approved by the Regional Board. Please note groundwater wells shall not be used as injection points to avoid reduction of the groundwater monitoring network, data bias, screening clogging and alteration.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from three up-gradient wells, MW-1, -2, and -4, two monitoring wells ,MW-3, and -23, at the center of plume, and two down-gradient monitoring wells, MW-17 and -20, on a semi-annual basis. Groundwater shall be monitored for the duration of the MRP in accordance with the following discharge monitoring program:

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

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Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually
Oxidation-reduction potential	milivolts	Grab	• Semi-Annually
Dissolved Oxygen	µg/L	Grab	• Semi-Annually
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually
Total Chromium and hexavalent chromium <sup>2</sup>	µg/L	Grab	• Semi-Annually
pH	pH units	Grab	• Semi-Annually
Temperature	<sup>0</sup> F/ <sup>0</sup> C	Grab	• Semi-Annually
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually

<sup>1</sup>. One week before injection and semi-annually thereafter.

<sup>2</sup>. The Discharger is required to monitor for total chromium and hexavalent chromium in the baseline, second and fourth semi-annual 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-Annual 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 the Regional Board.

Ordered by: Samuel Unger  
Samuel Unger, P.E.  
Executive Officer

Date: January 10, 2014