



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

January 16, 2009

Mr. Vern Larsen
Culver Motor Clinic
10707 Jefferson Boulevard
Culver City, CA 90230

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT
PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR
HEXAVALENT CHROMIUM IMPACTED SITES
CULVER MOTOR CLINIC
10707 JEFFERSON BOULEVARD, CULVER CITY
(ORDER NO. R4-2007-0019, SERIES NO. 058; CI NO. 9411)
(ID# R-07049) (USTCF CLAIM NO. 810)**

Dear Mr. Larsen:

Our letter dated May 16, 2008, transmitted the General Waste Discharge Requirements to inject ozone and hydrogen peroxide at the site referenced above in Los Angeles, California, for groundwater remediation.

On your behalf, Stratus Environmental, Inc. (Stratus) submitted the "Ozone and Hydrogen Peroxide Injection Pilot Test Report (Report)," dated August 22, 2008. The results of the pilot test indicated that in-situ ozone and hydrogen peroxide injection is effective to clean up the groundwater contamination beneath the site. Stratus proposed to install two additional nested injection wells IW-2A/B and IW-3A/B south of the former underground storage tank area for the full scale in-situ remediation project. Your proposal was approved by Regional Board staff on January 15, 2009.

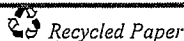
We have revised the groundwater monitoring program CI-9411 to reflect the full scale in-situ remediation. Groundwater monitoring will be performed in wells MW-1B, MW-5A/B, MW-6, MW-9, MW-11A/B, MW-13A/B, P-1 and MW-8, to monitor the effectiveness of the in-situ groundwater remediation. Each of these wells will be monitored prior to the initiation of the remediation activities and periodically during and after the injection activities.

The WDRs issued shall not be rescinded until Regional Board staff determine the WDRs are no longer needed for the subject site.

The Monitoring and Reporting Program requires you to implement the monitoring program 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-9411, 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.

California Environmental Protection Agency



Mr. Vern Larsen
Culver Motor Clinic

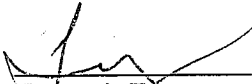
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A copy of the Order will be furnished to anyone who requests it, or on line at:
[http://www.waterboards.ca.gov/losangeles/board decisions/adopted orders/general orders/r4-2007-0019/r4-2007-0019.pdf](http://www.waterboards.ca.gov/losangeles/board%20decisions/adopted%20orders/general%20orders/r4-2007-0019/r4-2007-0019.pdf).

If you have any questions, please contact. Dr. Rebecca Chou at (213) 620-6156 or Mrs. Mercedes Hsu at (213) 576-6712.


Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9411

cc: Ms. Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank
Cleanup Fund
Mr. Tim Smith, Los Angeles Department of Public Works, Environmental Program Division
Ms. Nancy Matsumoto, Water Replenishment District of Southern California
Mr. Ronald Bailey, Stratus Environmental, Inc.

California Environmental Protection Agency

 Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
REVISED MONITORING AND REPORTING PROGRAM NO. CI-9411
for
CULVER MOTOR CLINIC
10707 JEFFERSON BOULEVARD, CULVER CITY
(OZONE/HYDROGEN PEROXIDE INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 058)

I. REPORTING REQUIREMENTS

- A. Culver Motor Clinic Company (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 July - September 2008, shall be received at the Regional Board by **July 15, 2009**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

Monitoring reports must be addressed to the regional Board, Attention: Information Technology Unit.

- B. If there is no discharge or injection during any reporting period, the report shall so state.
- C. By January 30 of each year, beginning January 30, 2009, 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 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.

January 16, 2009

- 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. OZONE/HYDROGEN PEROXIDE INJECTION MONITORING REQUIREMENTS

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

1. Location map showing injection points used for the ozone hydrogen peroxide injection.
2. Written and tabular summary defining the quantity of ozone/hydrogen peroxide injected per month to the groundwater and a summary describing the days on which the injection system was in operation.
3. Quarterly visual inspection at each injection point shall be conducted to evaluate the well casing

integrity for a period of three month after each injection. The quarterly report shall include a summary of the visual inspection.

4. To avoid groundwater monitoring network reduction, data bias, and well screen clogging or alteration, no groundwater monitoring wells shall be used as injection points during the proposed ozone/hydrogen peroxide injection. Separate injection points/wells must be installed at the site for the injection.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site.

Groundwater samples shall be collected from up-gradient groundwater monitoring well MW-1B, source wells MW-5A/B, MW-6, MW-9, MW-11A/B and MW-13A/B and down-gradient wells P-1 and MW-8 to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Figure 2).

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 ¹
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	• Quarterly
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Quarterly
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Quarterly
Ethanol Formaldehyde Acetone	µg/L	Grab	• Quarterly
Total dissolved solids, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Quarterly
Oxidation-reduction potential	millivolts		• Quarterly
Dissolved Oxygen	mg/L	Grab	• Quarterly

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS ¹
Dissolved ferrous iron Arsenic	µg/L	Grab	• Quarterly
Total Chromium and chromium six ³	µg/L	Grab	• Quarterly
PH	pH units	Grab	• Quarterly
Temperature	⁰ F/ ⁰ C	Grab	• Quarterly
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Quarterly
¹ The first sampling event must be conducted one week following the ozone/hydrogen peroxide injection. ² The Discharger is required to monitor for these compounds only if they are detected in the first sampling event. ³ The Discharger is required to monitor for total chromium and chromium six only if they are detected in the first sampling event.			

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.

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

Culver Motor Clinic
Monitoring & Reporting Program No. CI-9411

Order No. R4-2007-0019

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

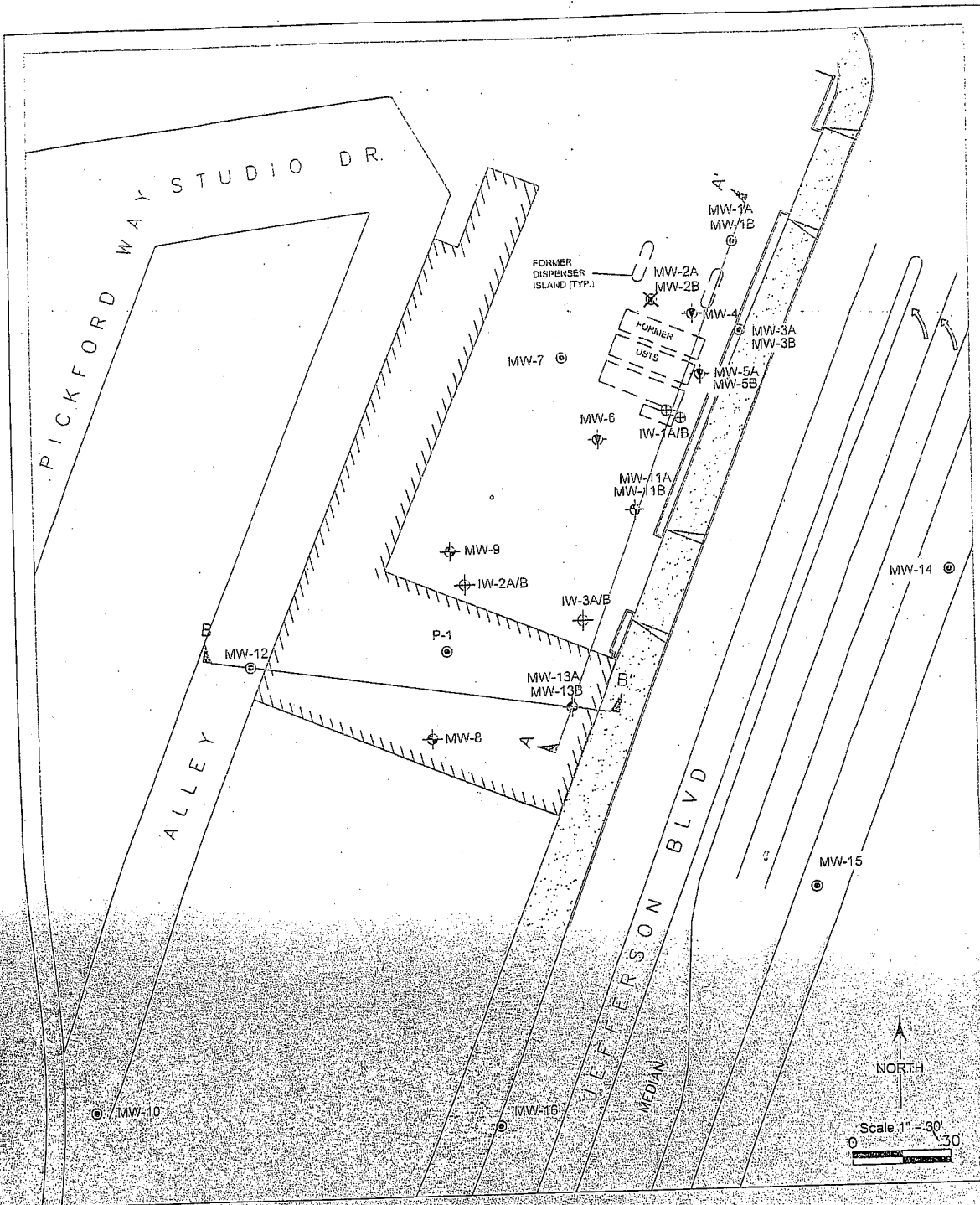
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:



Tracy J. Egoscue
Executive Officer

Date: January 16, 2009



LEGEND

- MW-1 MONITORING WELL
- ⊕ MW-8 VAPOR EXTRACTION WELL
- ⊕ MW-6 GROUNDWATER/VAPOR EXTRACTION WELL
- ⊕ IW-1A/B OZONE/H₂O₂ INJECTION WELL
- ⊕ IW-2A/B PROPOSED OZONE/H₂O₂ INJECTION WELL
- A A' GEOLOGIC CROSS SECTION LINE; SEE FIGURE 4
- ⊗ MW-2A/2B ABANDONED MONITORING WELL

FIGURE 2
SITE MAP
CULVER MOTOR CLINIC
10707 JEFFERSON BLVD.
CULVER CITY, CALIFORNIA

DATE 8/20/2008	PROJECT NO. 1008-10707
PREPARED BY R. CROWDER	
DRAWN BY R. CROWDER	
REVIEWED BY R. BAILEY	