



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

October 1, 2010

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

**AMENDMENT OF GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL AND/OR 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)
(UST FILE NO. 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 Culver City, California for groundwater remediation.

On January 16, 2009, the Executive Officer of the Regional Board issued Order No. R4-2007-0019 to the subject site revising the groundwater monitoring program CI-9411 to reflect the full scale in-situ remediation.

On your behalf, Stratus submitted a "Request to Modify the Sampling Frequency" dated August 3, 2010, for the existing General Waste Discharge Requirements (Order No. R4-2007-0019) Monitoring Program (CI No. 9411) issued to the subject site on January 16, 2009. Your request is granted.

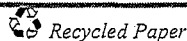
We have revised the groundwater monitoring program CI-9411 to reflect the full scale in-situ remediation and reduction of groundwater sampling frequency. Groundwater monitoring will be performed in wells MW-1B, MW-5A/B, MW-6, MW-9, MW-11/A/B, MW-13A/B, P-1, and MW-8.

The WDRs issued shall not be terminated 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 reference Compliance File No. CI-9411 to 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



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

Mr. Vern Larsen
Culver Motor Clinic

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October 1, 2010

A copy of the Order will be furnished to anyone who requests its, 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 Ms. Rebecca Chou at (213) 576-6618. Questions regarding the underground storage tank issues should be forwarded to Ms. Chandra Cansler-Tyler at (213) 576-6782 or email her at ccansler@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosures: Amended Monitoring and Reporting Program No. CI-9411

Cc: Kathy Jundt, State Water Resources Control Board, Underground Storage Tank
Cleanup Fund
Nancy Matsumoto, Water Replenishment District of Southern California
Tim Smith, Los Angeles County Department of Public Works
Richard Lavin, Los Angeles County Department of Public Health, Envr. Programs
Ronald Bailey, Stratus Environmental, Inc.

California Environmental Protection Agency



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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, CA

(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 – December 2010, shall be received at the Regional Board by **January 15, 2011**. 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 th
July - December	January 15 th

- 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 1 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 (WDR).
- 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.

- 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.
- L. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. OZONE/HYDROGEN PEROXIDE INJECTION MONITORING REQUIREMENTS

The semi-annual reports shall contain the following information regarding the injection activities.

1. Location map showing injection points used for the ozone hydrogen peroxide injection.

2. Written and tabular summary defining:
 - Depth of injection points;
 - Quantity of ozone/hydrogen peroxide injected at each injection point per month to the groundwater;
 - Days on which the injection system was in operation; and
3. Semi-annual visual inspection at each injection well shall be conducted to evaluate the well casing integrity after each injection. The semi-annual 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 injection. Separate injection points/wells must be installed at the Site for the proposed injection.

III. GROUNDWATER MONITORING PROGRAM

A groundwater-monitoring program shall be designed to detect and evaluate impacts associated with the injection activities. The monitoring well network must include MW-1B as upgradient well; MW-5A/B, MW-6, MW-9, MW-11A/B and MW-13A/B as source wells; and P-1 and MW-8 as downgradient wells (refer to attached Figure 2).

Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

<u>CONSTITUENT</u>	<u>UNITS</u> ¹	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u>
pH ²	pH units	grab	Semi-annually
Temperature ²	°F	grab	Semi-annually
Oxidation-reduction potential ²	Milivolts	grab	Semi-annually
Specific conductivity ²	µmhos/cm	grab	Semi-annually
Ferrous iron	µg/L	grab	Semi-annually
Dissolved Oxygen ²	µg/L	grab	Semi-annually
Total Petroleum Hydrocarbons (as gasoline)	µg/L	grab	Semi-annually
Benzene	µg/L	grab	Semi-annually
Ethylbenzene	µg/L	grab	Semi-annually
Toluene	µg/L	grab	Semi-annually
Total xylenes	µg/L	grab	Semi-annually
MTBE	µg/L	grab	Semi-annually

TBA	µg/L	grab	Semi-annually
TAME	µg/L	grab	Semi-annually
DIPE	µg/L	grab	Semi-annually
ETBE	µg/L	grab	Semi-annually
Ethanol	µg/L	grab	Semi-annually
Methane	µg/L	grab	Semi-annually
Formaldehyde	µg/L	grab	Semi-annually
Acetates	µg/L	grab	Semi-annually
Total organic carbon	µg/L	grab	Semi-annually
Total dissolved solids	mg/l	grab	Semi-annually
Arsenic	mg/L	grab	Semi-annually
Bromide	mg/L	grab	Semi-annually
Sulfate	mg/L	grab	Semi-annually
Chloride	mg/L	grab	Semi-annually
Boron	mg/L	grab	Semi-annually
Sodium	mg/L	grab	Semi-annually
Carbon dioxide	mg/L	grab	Semi-annually
Manganese	µg/L	grab	Semi-annually
Total iron	µg/L	grab	Semi-annually
Alkalinity	µg/L	grab	Semi-annually
Total chromium ³	µg/L	grab	Semi-annually
Chromium six ³	µg/L	grab	Semi-annually

mg/L: milligrams per liter; µg/L: micrograms per liter; µmhos/cm: microohms per centimeter; °F: degree Fahrenheit.

² Field instrument may be used to measure this parameter.

³ The Discharger is required to monitor for total chromium and chromium six 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

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations dropped by the Executive Officer if the Discharger makes a request and the request is backed by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following completed 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 _____.

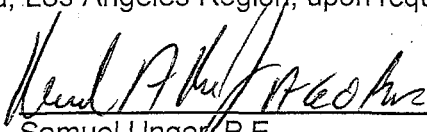
(Signature)

(Title)"

VI. PUBLIC DOCUMENTS

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

Ordered by:



Samuel Unge, P.E.
Executive Officer

Date: October 1, 2010

