



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

August 14, 2008

Mr. Patrick Lacey
Skyview Center, LLC
9911 West Pico Blvd, Suite 1200
Los Angeles, CA 90035

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES - SKYVIEW CENTER, 6053 CENTURY BLVD, LOS ANGELES (ORDER NO. R4-2007-0019, SERIES NO. 076; CI NO. 9442)

Dear Mr. Lacey:

We have completed our review of your application for coverage under the General Waste Discharge Requirements to inject Ozone at the site referenced above in Los Angeles for soil/groundwater cleanup and remediation.

In January 2004, a leak was discovered in the diesel fuel system. The assessment conducted subsequently indicated up to 35,000 mg/Kg TPH_d at 15 feet below ground surface (bgs) with low concentrations of benzene and MTBE (less than 1 mg/Kg) were detected beneath the subject site. The VOC level decreased with depth to 0.025 mg/Kg at 25 feet bgs and non-detected at 30 and 35 feet bgs. The diesel contamination is clearly defined and is limited to the soil only. There are no groundwater monitoring wells installed at the subject site.

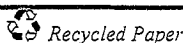
To remediate the diesel contamination to the soil, a "Revised Remedial Action Plan" (RAP) dated January 4, 2007, by Citadel Environmental Services, Inc., proposed to inject ozone into the soil to enhance biodegradation and natural attenuation of diesel (please refer Figure 1). Ozone will be injected through three injection wells OI-1, OI-2 and OI-3, screened from approximately 5-10 to 20 feet bgs.

Since this is soil only case, there is no need for groundwater monitoring requirements in the Monitoring Program No. 9442.

A letter dated January 15, 2008 from Los Angeles City Fire Department approved the Remedial Action Plan. Please note that RegenOx—even though the approved January 4, 2007 RAP mentioned it as a possible injection medium—is not covered under the Order No. R4-2007-0019 and its use is not applied for in your Application of Waste Discharge. As a result, RegenOx should not be used for injection at the subject site.

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

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.

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-9442 and Standard Provisions. This Waste Discharge Requirements shall not be rescinded without the regulatory oversight agency's prior approval.

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.

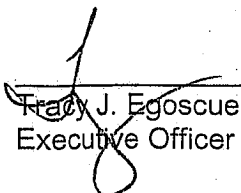
When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9442, which will assure that the reports are directed to the appropriate file and staff. Do not combine other reports with your monitoring reports. Submit 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/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf

If you have any questions, please contact Dr. Rebecca Chou at (213) 620-6156 for WDRs administration matters, and Mr. Gregg Kwey at (213) 576-6702 for technical matters.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosures: 1. Board Order No. R4-2007-0019
2. Standard Provisions for Reporting and Monitoring
3. Monitoring and Reporting Program No. CI-9442

cc: Mr. Frank Comfort, Los Angeles City Fire Department
Mr. Dan Louies, Citadel Environmental

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9442
FOR
SKYVIEW CENTER
6053 CENTURY BLVD, LOS ANGELES
(OZONE INJECTION FOR SOIL CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 076)

I. REPORTING REQUIREMENTS

- A. Skyview Center, LLC (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 October 15, 2008. 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

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. 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).
- C. 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.

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- D. 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.
- E. 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.
- F. 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.
- 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 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.
- 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 Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. OZONE INJECTION MONITORING REQUIREMENTS

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

1. Location map showing injection points used for the ozone injection. Three injection points: OI-1, OI-2 and OI-3; are currently proposed that can be referenced in the Figure 1. Additional injection points, if needed, must be approved by Los Angeles City Fire Department prior to implementation.
2. Written and tabular summary defining the quantity of ozone/hydrogen peroxide injected per month to the soil and a summary describing the days on which the injection system was in operation.
3. Confirmation soil borings must be conducted after a period of injection.

III. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis 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.

IV. 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)"

V. PUBLIC DOCUMENTS

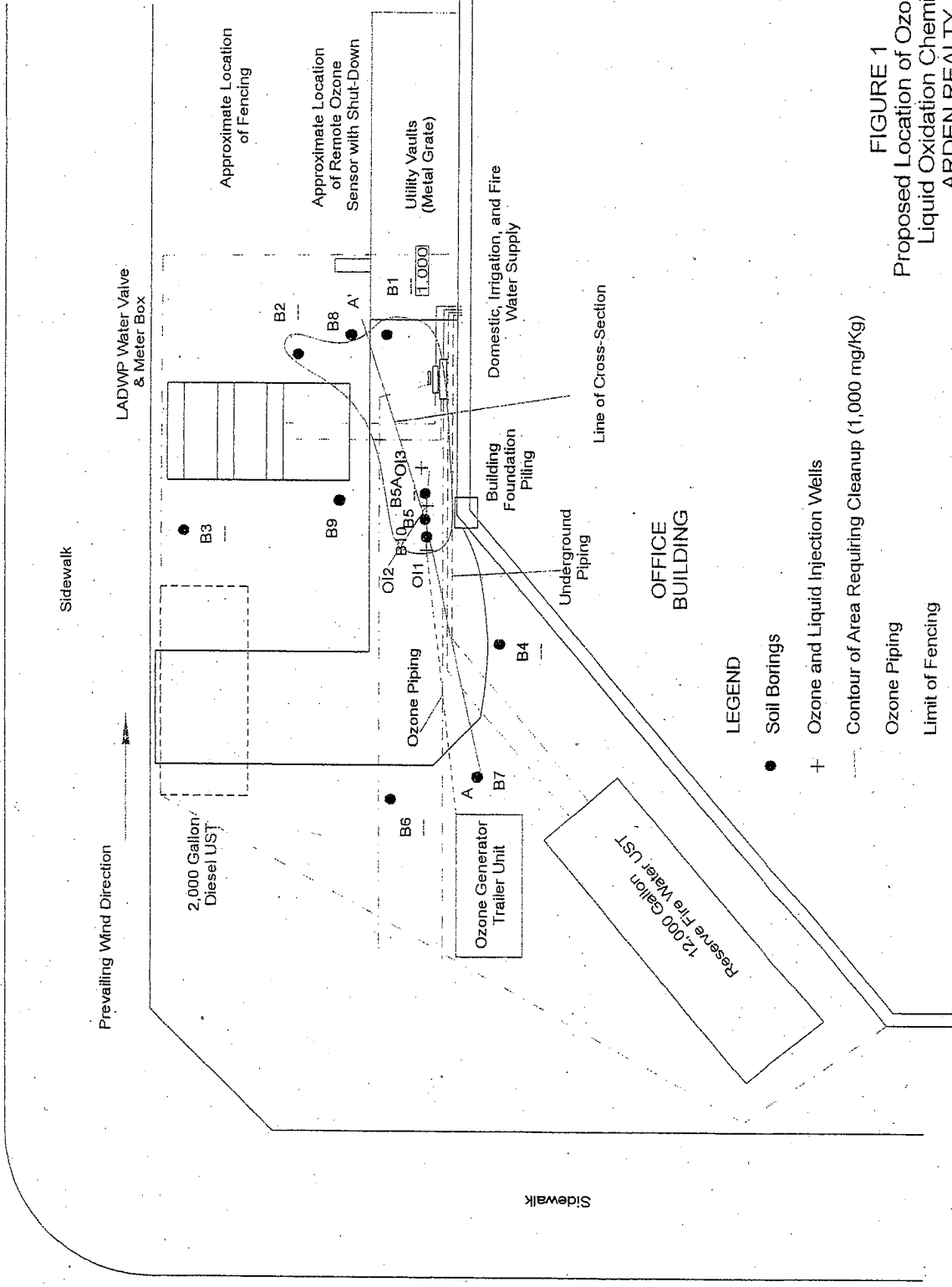
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:


Tracy J. Egoscue
Executive Officer

Date: August 14, 2008

98th Street

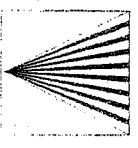


LEGEND

- Soil Borings
- + Ozone and Liquid Injection Wells
- Contour of Area Requiring Cleanup (1,000 mg/Kg)
- Ozone Piping
- Limit of Fencing

FIGURE 1
 Proposed Location of Ozone and
 Liquid Oxidation Chemicals
 ARDEN REALTY
 SKYVIEW CENTER
 6053 West Century Boulevard
 Los Angeles, California

SCALE			NORTH	
DRAWN BY	J. NICOLICH		1/18/06	
CHECKED BY	D. LOUKS		1/20/06	
REVISED BY	D. LOUKS		11/27/06	



CITADEL
 ENVIRONMENTAL SERVICES, INC.

