



# California Regional Water Quality Control Board Los Angeles Region



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<http://www.waterboards.ca.gov/losangeles>

Linda S. Adams  
*Acting Secretary for  
Environmental Protection*

Edmund G. Brown Jr.  
*Governor*

March 11, 2011

Mr. Will Deits  
Oxnard Community College District  
255 West Stanley Avenue, suite 150  
Ventura, CA 93001

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT  
PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR  
HEXAVALENT CHROMIUM IMPACTED SITES—LIBERAL ARTS BUILDING, OXNARD  
COMMUNITY COLLEGE, 4000 ROSE AVENUE, OXNARD (ORDER NO. R4-2007-0019-140;  
CI NO. 9626)**

Dear Mr. Deits:

We have completed our review of your application for coverage under the General Waste Discharge Requirements to inject Fenton's Reagent at the site referenced above for groundwater cleanup and remediation.

One 8,000-gallon USTs containing diesel was removed from the Liberal Arts Building area in 1997. Upon removal of the tank, free phase diesel fuel was noted in the tank excavation. Prior to backfilling the excavation, a free-phase recovery system was installed and it was successful in removing the free-phase product from the groundwater table before backfilling. Thereafter, multiple phases of soil and groundwater assessments have resulted in the installation of numerous soil borings and 5 groundwater monitoring wells. Free phase diesel was detected in one of the wells: EW-1. The removal of the free phase product from EW-1 was conducted from April 9, 2009 to July 31, 2009. A rebound test was conducted in August 2009 and confirmed the absence of free phase product in EW-1. The analytical test on groundwater sample from EW-1 after the rebound test indicated the detection of dissolved diesel at 13.1 mg/L, while no other fuel hydrocarbons were detected.

To further remediate residual groundwater contamination, your consultant, Rincon Consultants, proposed in the "Free Phase Diesel Removal Report and Fenton's Reagent Treatability Test Workplan" (Workplan) dated January 18, 2010, to conduct an in-situ Fenton's Reagent injection through 12 locations (please reference Figure 4 in the Workplan). A letter dated March 29, 2010, from Ventura County Environmental Health Department (VCEHD) approved the Workplan.

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. 2007-0019-140 and Monitoring and Reporting Program No. CI-9626 and Standard Provisions. This Waste Discharge Requirements shall not be terminated 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-9626, 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.

To avoid paying future annual fees, please submit 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.

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](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 or [rchou@waterboards.ca.gov](mailto:rchou@waterboards.ca.gov) for WDRs administration matters, or Mr. Gregg Kwey at (213) 576-6702 or [gkwey@waterboards.ca.gov](mailto:gkwey@waterboards.ca.gov) for technical matters.

Sincerely,

*for*   
Samuel Unger, P.E.  
Executive Officer

- Enclosures: 1. Board Order No. R4-2007-0019  
2. Standard Provisions for Reporting and Monitoring  
3. Monitoring and Reporting Program No. CI-9626

cc: Ms. Diane Wahl, Ventura County Division of Environmental Health  
Mr. Eric Feldman, Rincon Consultants



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

MONITORING AND REPORTING PROGRAM NO. CI-9626

FOR

LIBERAL ARTS BUILDING  
OXNARD COMMUNITY COLLEGE  
4000 ROSE AVENUE, OXNARD

(FENTON'S REAGENT INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4-2007-0019, SERIES NO. 140)

I. REPORTING REQUIREMENTS

- A. Oxnard Community College District (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 to December 2009, 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
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. The Discharger shall submit all reports required under this monitoring and reporting program, including groundwater monitoring data, to the State Water Resources Control Board GeoTracker database, in addition to submitting hard copies to the Regional Board office. Once the Discharger demonstrate mastery of electronic submittal of reports to GeoTracker for the Site, it may request that the Regional Board waive the requirement of submitting hard copies of reports.
- 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.

- 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. 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.
- F. 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.
- G. 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.
- H. 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.
- I. 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.

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

II. FENTON'S REAGENT INJECTION MONITORING REQUIREMENTS

The Semi-Annually reports shall contain the following information regarding injection activities:

1. Location map showing locations used for the Fenton's Reagent injection. 12 borings (approximate spacing of 10 feet between borings in a staggered pattern within the square area covering EW-1 as identified in Figure 4) within the hydrocarbon impacted soil zone beneath the site are currently proposed to be used as injection points. Groundwater wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias. Additional injection points should be reviewed and approved by the County of Ventura, Environmental Health Division (VCEHD) and Regional Board prior to full scale implementation.
2. Written and tabular summary defining the quantity of Fenton's Reagent injected and a summary describing the days on which the injection system was in operation.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from three down-gradient monitoring wells RW-1, RW-2 and EW-3; one source area monitoring wells EW-1; and one up-gradient monitoring wells RW-3 on a Semi-Annually basis to monitor the effectiveness of the in-situ groundwater remediation. Additional monitoring wells for full scale implementation may be required if VCEHD and Regional Board deemed they are necessary. 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	• Semi-Annually <sup>1</sup>

Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-Annually <sup>1</sup>
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Semi-Annually <sup>1</sup>
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually <sup>1</sup>
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually <sup>1</sup>
Oxidation-reduction potential	millivolts		• Semi-Annually <sup>1</sup>
Dissolved Oxygen	µg/L	Grab	• Semi-Annually <sup>1</sup>
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually <sup>1</sup>
Total Chromium and chromium six <sup>2</sup>	µg/L	Grab	• Semi-Annually <sup>1</sup>
PH	pH units	Grab	• Semi-Annually <sup>1</sup>
Temperature	<sup>0</sup> F/ <sup>0</sup> C	Grab	• Semi-Annually <sup>1</sup>
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually <sup>1</sup>

<sup>1</sup> One week before injection and Semi-Annually thereafter

<sup>2</sup> The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth Semi-Annually 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-Annually 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 \_\_\_\_\_.

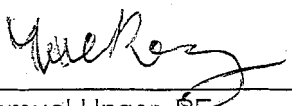
\_\_\_\_\_(Signature)

\_\_\_\_\_(Title)"

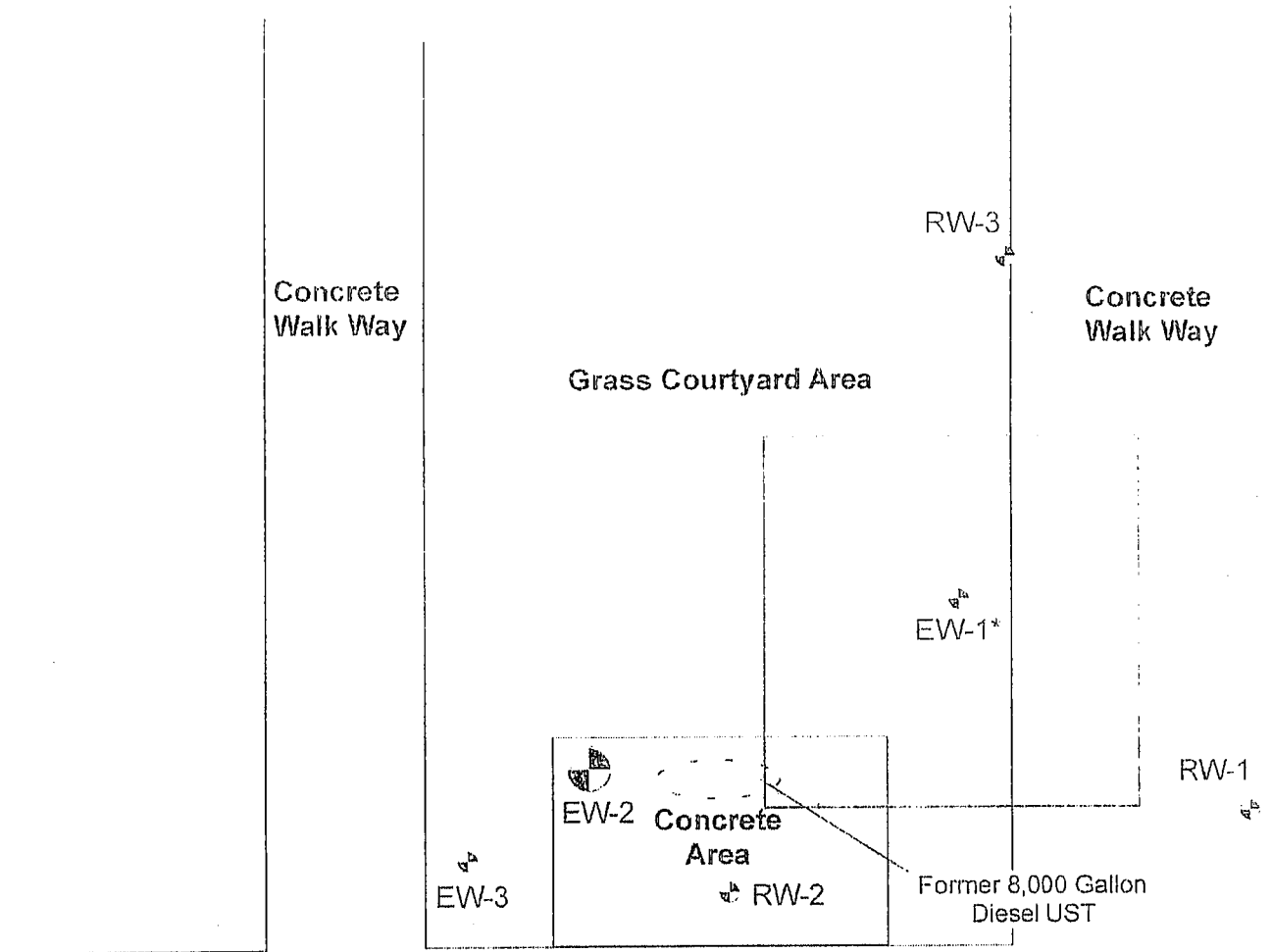
VI. PUBLIC DOCUMENTS

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





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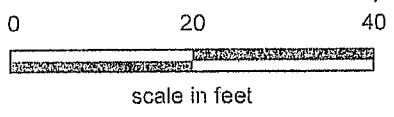
  
for Samuel Unger, PE  
Executive Officer


Date: March 11, 2011



Liberal Arts Building

- \* Contains Free-Phase Product
-  EW-2 4-Inch Diameter Groundwater Monitoring Well (no historical record)
-  EW-1 2-Inch Diameter Groundwater Monitoring Well (no historical record)
-  RW-1 Rincon 2-Inch Diameter Groundwater Monitoring Well
-  Injection Area



 Proposed Injection Area	
Liberal Arts Building 4000 South Rose Avenue Oxnard, California	Figure 4