

Los Angeles Regional Water Quality Control Board

July 17, 2012

Mr. Jan Takata
Senior Manager
Chief Executive Office, Room 754
Capital Projects/Debt Management
County of Los Angeles
500 West Temple Street
Los Angeles, CA 90012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7005 0390 0000 4138 7065

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT
PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR
HEXAVALENT CHROMIUM IMPACTED SITES
MARINA DEL REY SHERIFF'S STATION
13851 FIJI WAY, MARINA DEL REY
(ORDER NO. R4-2007-0019, CI NO. 9838, SERIES NO. 193)
(UST FILE NO. R-09811, GLOBAL ID NO. WDR100006205)**

Dear Mr. Takata:

We have completed our review of the application for coverage under the General Waste Discharge Requirements (WDR) to inject Klozur™ (sodium persulfate that is activated by sodium hydroxide) into groundwater at the subject site (Site). The purpose of the injection is to mitigate fuel constituents present in groundwater beneath the Site in order to minimize the threat to the underlying aquifers and the nearby Marina del Rey Harbor.

The Site is currently a Los Angeles County Sheriff's Station facility located at 13851 Fiji Way in Marina del Rey. The facility contains Sheriff's station buildings, a dock, and six patrol boats. The Site does not currently contain any underground storage tanks (USTs), but does contain one 1,000-gallon diesel aboveground storage tank. The facility owner and the responsible party (Discharger) is the Los Angeles County Executive Office.

Site investigations conducted at the Site in 2001, 2002, 2008, and 2009 included drilling soil borings and installing groundwater monitoring wells. Site investigations conducted to date indicate that the soil and groundwater beneath the Site have been impacted by fuel constituents. Maximum concentrations of total petroleum hydrocarbons (TPH_G), benzene, methyl tertiary butyl ether (MTBE), and tertiary butyl alcohol (TBA) in the soil were 3,000 milligrams per kilogram (mg/kg) (TPH_G), 6.1 mg/kg (benzene), 20 mg/kg (MTBE), and 13 mg/kg (TBA), respectively.

A total of eight groundwater monitoring wells (MW-1 through MW-8) have been installed at the Site. Groundwater monitoring was conducted once in 2002, two times in 2008, three times in 2009, four times in 2010, once in 2011, and once in 2012. The most recent monitoring data (March 2012) indicated up to 10,000 micrograms per liter (µg/L) TPH_G, 360 µg/L (benzene), 10,000 µg/L MTBE, and 6,100 µg/L TBA, respectively. Groundwater was measured in March 2012 at a depth between 4 and 9 feet bgs and the groundwater flow direction has typically been

reported to be toward the west, although the Site's proximity adjacent to Marina del Rey Harbor to the west suggests that the groundwater flow direction is likely tidally influenced.

In a remedial action plan addendum (RAP Addendum) dated April 15, 2011, along with e-mail correspondence from Strategic Engineering and Science Inc. (SES) on May 3, 2012, the Discharger's consultant proposed to perform in-situ chemical oxidation (ISCO) using Klozur™ (sodium persulfate that is activated by sodium hydroxide) to mitigate the contaminated groundwater beneath the Site. On May 25, 2012, SES submitted a WDR application on behalf of the Discharger. In a directive letter dated May 17, 2012, Regional Board staff approved the RAP Addendum.

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 Site (General WDRs)*" adopted by the Los Angeles Regional Water Quality Control Board on March 1, 2007.

Enclosed are the Waste Discharge Requirements, consisting of Regional Board Order No. R4-2007-0019, Monitoring and Reporting Program (MRP) No. CI-9838, and Standard Provisions.

The WDRs issued shall not be terminated until Regional Board staff determines the WDRs are no longer needed for the site cleanup.

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, please include a reference to Compliance File No. CI-9838 to assure that the reports are directed to the appropriate staff. Do not combine other reports with your monitoring reports complying with Order No. R4-2007-0019. Submit each type of report as a separate document.

In accordance with regulations adopted by the State Board in September 2004 regarding electronic submittal of information (ESI), the Discharger has been electronically submitting monitoring reports to the State Board GeoTracker system under UST Global ID T0603704864. To comply with the Monitoring and Reporting Program (MRP) under this WDR, the Discharger shall upload the WDR monitoring reports to GeoTracker under the two Global IDs: Global ID T0603704864 (continuing) and Global ID WDR100006205 (new). For more information regarding the new Global ID under WDR, please see the ESI training video available at: <https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>.

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. A copy of the Order can also be found online at: http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf.

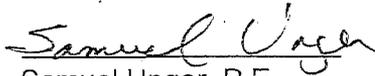
To avoid paying future annual fees, please submit written request for termination of your enrollment under the general permit in a separate letter, when your project has been completed and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing

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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 Dr. Eric Wu at (213) 576-6683 or ewu@waterboards.ca.gov. Questions regarding the underground storage tank issues should be forwarded to Mr. Dave Bjostad at (213) 576-6712 or dbjostad@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

- Enclosures: 1. Board Order No. R4-2007-0019
2. Monitoring and Reporting Program No. CI-9838
3. Standard Provisions

cc: Kathy Jundt, State Water Resources Control Board, UST Cleanup Fund
Tim Smith, Los Angeles County DPW, Environmental Program Division
Richard Lavin, County of Los Angeles, Department of Public Health, Drinking Water Programs
Phuong Ly, Water Replenishment District of Southern California
Al Tizani, Los Angeles County Chief Executive Office
John Bennett, Strategic Engineering and Science, Inc.