



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

April 4, 2014

Mr. Richard Solomon
Phillips 66 Company
3900 Kilroy Airport Way, Suite 210
Long Beach, California 90806

Certified Mail
Return Receipt Required
Claim No. 7010 3090 0002 1022 1523

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9928 – LOS ANGELES EAST TERMINAL, 13500 SOUTH BROADWAY, LOS ANGELES, CALIFORNIA (FILE NO. 13-009, ORDER NO. R4-2007-0019, SERIES NO. 217, CI-9928, GLOBAL ID. WDR100009975)

Dear Mr. Solomon:

On April 8, 2013, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) enrolled you under general Waste Discharge Requirements (WDR Order No. R4-2007-0019) with a Monitoring and Reporting Program (MRP) No. CI-9928 for injection of 5% activated persulfate for groundwater remediation of volatile organic compounds and total petroleum hydrocarbons.

On behalf of Phillips 66 Company, Environmental Resources Management submitted the *Initial Oxidant Injection Pilot Test Report and Supplemental Injection Work Plan* (Work Plan), dated October 10, 2013. The Work Plan proposed supplemental injections using three different materials due to the apparent limited effectiveness of the 5% activated persulfate injection over the monitoring period. It is estimated that 1,100 gallons of 3% sodium permanganate solution, 1,100 gallons of 5% RegenOx solution, and 1,100 gallons of 10% activated persulfate solution will be injected into 6 injection points at depths ranging from 40 to 65 feet below ground surface. On February 14, 2014, Regional Board approved the Work Plan.

The proposed supplemental injections shall not exceed 1,100 gallons of 3% sodium permanganate solution, 1,100 gallons of 5% RegenOx solution, and 1,100 gallons of 10% activated persulfate solution at 6 injection points as indicated in the Figure 1 of the revised MRP. The injection activities are expected to take approximately 4 weeks.

The revised MRP, which incorporates supplemental injections of sodium permanganate solution, RegenOx solution, and activated persulfate solution, is enclosed, and shall supersede the previously revised MRP dated March 17, 2014. The next monitoring report is due on **April 15, 2014** as required in the revised MRP. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100009975. ESI training video is available at: <https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

For all parties who upload electronic documents to State Database GeoTracker, it is no longer necessary to email a copy of these documents to losangeles@waterboards.ca.gov or submit hard copies to our office. The Regional Board will no longer accept documents (submitted by either hard copy or email) already uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker Users dated December 12, 2011 at: <http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20OGT%20Users.pdf>

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general WDR in a separate letter when the project is completed and the WDR 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.

If you have any questions, please contact the Project Manager, Dr. Ann Chang at (213) 620-6122 (achang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (ewu@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9928 dated April 4, 2014

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9928
FOR
LOS ANGELES EAST TERMINAL
13500 SOUTH BROADWAY, LOS ANGELES, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2007-0019 (SERIES NO. 217)
FILE NO. 13-009

I. MONITORING AND REPORTING REQUIREMENTS

- A. Phillips 66 Company (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (April 4, 2014) under Regional Board Order No. R4-2007-0019. The next monitoring report under this program shall be received at the Regional Board by **April 15, 2014**. 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

- B. If there is no discharge or injection, during any reporting period, the report shall so state. 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 discuss 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.
- C. The Discharger shall comply with requirements contained in Section G of Order No. R4-2007-0019 "*Monitoring and Reporting Requirements*".

II. DISCHARGE MONITORING PROGRAM

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

1. Location map showing injection points used for the sodium permanganate solution, RegenOx solution, and activated persulfate solution.
2. Written and tabular summary defining depth of injection points, quantity of the sodium permanganate solution, RegenOx solution, and activated persulfate solution injected at each injection point, and total amount of the sodium permanganate solution, RegenOx solution, and activated persulfate solution injected at the Site.
3. Visual inspection at each injection point shall be conducted and recorded during the injection.

III. GROUNDWATER MONITORING PROGRAM

A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from monitoring wells MW-41, MW-47, MW-48, MW-58, and PS-1 (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by specified schedules from all 5 monitoring wells for the following groundwater parameters:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline and quarterly after injection
Oxidation-Reduction Potential	millivolts	grab	Baseline and quarterly after injection
pH	pH units	grab	Baseline and quarterly after injection
Specific Conductivity	mS/cm	grab	Baseline and quarterly after injection
Temperature	°C	grab	Baseline and quarterly after injection
Turbidity	NTU	grab	Baseline and quarterly after injection

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Organic Carbon	mg/L	grab	Baseline and quarterly after injection
Total Dissolved Solids	mg/L	grab	Baseline and quarterly after injection
Sulfate	mg/L	grab	Baseline and quarterly after injection
Chloride	mg/L	grab	Baseline and quarterly after injection
Boron	mg/L	grab	Baseline and quarterly after injection
Nitrate and Nitrite	mg/L	grab	Baseline and quarterly after injection
Manganese	mg/L	grab	Baseline and quarterly after injection
Volatile Organic Compounds	µg/L	grab	Baseline and quarterly after injection
Total Petroleum Hydrocarbons	µg/L	grab	Baseline and quarterly after injection

All groundwater monitoring reports must include, at 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

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

All records and reports submitted in compliance with Order No.R4-2007-0019 and Monitoring and Reporting Program No. CI-9928 are public documents and will 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. Only proprietary information, and only at the request of the Discharger will be treated as confidential.

VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data in Electronic Deliverable Format, discharge location data, and searchable Portable Document Format of monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100009975.

Ordered by: Samuel Unger
Samuel Unger, P.E.
Executive Officer

Date: April 4, 2014