
Central Valley Regional Water Quality Control Board

23 January 2020

Brad Staub
Ed Staub & Sons, Inc.
1301 Esplanade
Klamath, OR 97601

NOTICE OF APPLICABILITY, ORDER R5-2003-0044-035, UST CASE #250013 AND SCP CASE #SLT5R1084, ED STAUB & SONS BULK PLANT, 406 WEST 8TH STREET, ALTURAS, MODOC COUNTY

You have submitted a Notice of Intent (NOI) for the subject site. Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff have determined that the proposed land disposal of treated groundwater generally meets required conditions for authorization under *Order R5-2003-0044, General Order for Land Disposal of Groundwater and Water from Cleanup of Petroleum Fuel Pollution (General Order)*.

Central Valley Water Board staff has concerns regarding the low infiltration rate as indicated by the double ring infiltrometer test. The measured infiltration rate may result in potential flooding or runoff as a result of the discharge of treated groundwater to land. Note the following Discharge Prohibitions from the General Order:

5. *The surfacing of treated/untreated wastewater resulting from subsurface disposal/treatment of petroleum polluted ground or surface water is prohibited.*
6. *Ponding/ponding of treated/untreated effluent on the ground surface in any location other than that approved by Regional Board staff is prohibited.*
7. *Runoff of water from the permitted discharge area is prohibited.*

As a condition of this Notice of Applicability (NOA), Ed Staub & Sons, Inc. (Staub) provided the 18 November 2019 *Remedial Action Contingency Plan* (Contingency Plan) prepared by Apex Envirotech (Apex) to address potential groundwater surfacing, ponds, pools, or discharges from the site as runoff. Apex has indicated that surfacing of groundwater can be prevented by controlling pumping rates on the influent side of the dual phase extraction (DPE) system. The Contingency Plan describes monitoring procedures, a visual observation schedule, sampling protocol, and shutoff triggers as described in the attached Monitoring and Reporting Program. The Contingency Plan

also proposes alternative storage and disposal procedures, as appropriate (i.e., storage and offsite disposal of effluent).

You are hereby assigned **General Order R5-2003-0044-035**. All requirements of the General Order will apply to your project. You can find the General Order on the [State Water Board's Adopted Orders web page](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2003-0044.pdf) (http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2003-0044.pdf).

General Order R5-2003-0044-035 prescribes minimum groundwater monitoring requirements for compliance. The attached Monitoring and Reporting Program sets forth minimum requirements; additional monitoring may be necessary if proposed compliance wells show unanticipated results.

PROJECT LOCATION

The project is at 406 West 8th Street, Alturas, Modoc County.

PROJECT DESCRIPTION

The project generally consists of: extraction wells RW-1, RW-2, RW-3, RW-4, and VW-1; two recovery trenches (Trench-1 and Trench-2); an above-ground DPE system treatment plant that will consist of a 125-gallon air water separator, a Mako Industries 400LR thermal/catalytic oxidizer powered by a 25-horsepower liquid ring pump that supplies up to 28 inches of mercury vacuum to extraction wells for a maximum volumetric flow of 400 actual feet per minute, air stripper, three 1,000-pound liquid-phase granulated activated carbon filters in series, extraction and discharge piping; and an infiltration gallery. Project design assumes unattended, continuous operation for a period of two to five years. The project includes the following site-specific groundwater monitoring schedule:

Groundwater Monitoring Schedule

Laboratory Data

Sampling Frequency	Wells	Chemical Constituents ¹
Quarterly	MW-1A, MW-2, MW-2A, MW-3A, MW-4A, MW-5A, MW-6A, MW-7A, MW-8A, MW-9A, RW-1, RW-2, and VW-1	TPHG, TPHD, BTEX, MTBE, DIPE, TBA, TAME, 1,2-DCA, EDB, Naphthalene

Table Notes:

1. TPHG (total petroleum hydrocarbons as gasoline) and TPHD (total petroleum hydrocarbons as diesel), by EPA Method 8015 modified; BTEX (Benzene, Ethylbenzene, Toluene, and Xylenes); MtBE (Methyl tert Butyl Ether), DIPE (Di-isopropyl Ether), TBA (tert-Butyl Alcohol), and TAME (tert-Amyl Methyl Ether); and 1,2-DCA (1,2-Dichloroethane), EDB (1,2-Dibromomethane) and Naphthalene, all by EPA Method 8260B.

Field Data

Measurement Frequency	Wells	Parameters ²
Monthly	MW-1A, MW-2, MW-2A, MW-3A, MW-4A, MW-5A, MW-6A, MW-7A, MW-8A, MW-9A, RW-1, RW-2, and VW-1	Depth to Water, free phase petroleum product thickness
Quarterly	MW-1A, MW-2, MW-2A, MW-3A, MW-4A, MW-5A, MW-6A, MW-7A, MW-8A, MW-9A, RW-1, RW-2, and VW-1	pH, temperature, ORP, specific conductance

Table Notes:

2. Depth to water, feet and hundredths below surveyed wellhead index marks; pH in standard units, temperature in degrees Centigrade or Fahrenheit, ORP, oxidation-reduction potential, in millivolts, and specific conductance, in micromhos/centimeter.

PUBLIC COMMENT

Interested parties and public agencies had an opportunity to comment on the Tentative NOA from 3 June 2019 to 3 July 2019. No comments were received.

GENERAL INFORMATION

1. Project activities shall be in accordance with requirements in the General Order and information submitted with the NOI.
2. You will receive annual billing of a required annual fee from the State Water Resources Control Board until the NOA is revoked.
3. You must comply with the attached Monitoring and Reporting Program, and submit results electronically and as hard copies, as provided therein.
4. Failure to abide by the conditions of the General Order could result in an enforcement action as authorized by the provisions of the California Water Code.

Contact Kate Burger of my staff at (530) 223-2081, Kate.Burger@waterboards.ca.gov, or 364 Knollcrest Drive, Suite 205, Redding, CA 96002, with questions or comments.

Original signed by Bryan J. Smith, P.E.

(for) Patrick Pulupa
Executive Officer

JS: ch

Enclosures: Monitoring and Reporting Program R5-2003-0044-035
Figures 1 and 2

cc with enclosures:

US Environmental Protection Agency, Region 9, San Francisco
US Fish and Wildlife Service, Sacramento
Department of Fish and Game, Region 1, Redding
Department of Health Services Office of Drinking Water, Redding
Department of Water Resources, Northern District, Red Bluff

cc via email with enclosures:

David Lancaster, Office of Chief Counsel, State Water Resources Control Board, Sacramento
Della Kramer, Central Valley Water Board, Rancho Cordova
Chris Murray, Modoc County Environmental Health, Alturas
Tom Landwehr, Apex Envirotech, Gold River