California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency 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

Cindy

April 3, 2007

Mr. Lou Cohen
19528 Ventura Boulevard, #330
Tarzana, CA 92306

Dear Mr. Cohen:

GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND And/Or HEXAVALENT CHROMIUM IMPACTED SITES – 877 SOUTH VENTURA BOULEVARD, OXNARD (ORDER NO. R4-2007-0019, SERIES NO. 005; CI NO. 9236)

We have completed our review of your application for coverage under General Waste Discharge Requirements to inject non-hazardous hydrogen peroxide at the site referenced above in Oxnard, California for groundwater cleanup and remediation.

Since April 1988, various subsurface investigations and remediation activities have been conducted at the subject site subsequent to the tank removal and replacement, which consisted of drilling and sampling numeral soil borings, installing nineteen groundwater monitoring wells (seven wells have since been abandoned due to site re-construction), excavating contaminated soil (1,545 tons), operating a groundwater pump-and-treat program (40,000 gallons impacted groundwater). The analytical data from groundwater monitoring event conducted in December 2005 indicated groundwater beneath the site was still impacted by TPHg (up to 9,060 µg/L), BTEX (up to 180 µg/L). The Groundwater flow direction underneath the site ranged from west to northwest at a gradient from approximately 0.005 to 0.05 feet/foot.

Despite the fact that past remediation efforts reduced the levels of contaminants in the subsurface, the petroleum hydrocarbon concentrations in the groundwater still exceed Regional Board guidelines for site closure. Therefore, further remediation with hydrogen peroxide injection is proposed.

A letter dated June 27, 2006 from Ventura County Division of Environmental Health approved Workplan for Remediation Pilot Testing dated April 17, 2006, and its Supplement dated June 19, 2006, for the injection of hydrogen peroxide to remediate impacted groundwater beneath the subject site.

Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration.

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 State Water Resources 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-9236 and Standard Provisions.

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-9236, 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/html/permits/gen_orders/R4-2007-0019/R4-2007-0019.pdf

If you have any questions, please contact Mr. Rod Nelson at (213) 576-6119.

Sincerely,

Jonathan S. Bishop
Executive Officer

Enclosures: 1. Board Order No. R4-2007-0019
2. Monitoring and Reporting Program No. CI-9236

cc: Mr. David Salter, Ventura County Division of Environmental Health
Mr. Emanuel Pedram, Applied Environmental Tech., Inc.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9236
FOR
AMERICAN GAS
877 SOUTH VENTURA BOULEVARD, OXNARD
(INORGANICS/NUTRIENTS INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 005)

I. REPORTING REQUIREMENTS

A. Mr. Richard S. Coburn (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 April-June 2007, shall be received at the Regional Board by July 15, 2007. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due
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. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

C. 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).

D. 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.

April 3, 2007

E. 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.

F. 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.

G. 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.

H. 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.

I. 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.

J. 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.

K. 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.

II. INORGANICS/NUTRIENTS INJECTION MONITORING REQUIREMENTS

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

1. Location map showing injection points used for the hydrogen peroxide. Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alternation. Up to seven injection points are proposed that can be referenced in the attached Plate 2. Plates 3 and 4 indicate the groundwater flow direction and TPHg plume, separately.

2. Written and tabular summary defining the quantity of hydrogen peroxide injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total hydrogen peroxide delivered per injection point	grams/day	--	• Quarterly

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from groundwater monitoring wells MW-5 (up-gradient); MW-13 and -14 (source area); MW-12 and -17 (down-gradient); on a quarterly basis to monitor the effectiveness of the in-situ groundwater remediation. Hydrogen peroxide injection points shall not be used as monitoring points. 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	• Bi-weekly/Quarterly[1]
Benzene, Toluene, Ehylbenzene, Xylenes (BTEX)	µg/L	Grab	• Bi-weekly/Quarterly[1]

Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Bi-weekly/Quarterly[1]
Ethanol Formaldehyde Acetone	µg/L	Grab	• Bi-weekly/Quarterly[1]
Total dissolved solids Boron Chloride Sulfate	mg/L	Grab	• Bi-weekly/Quarterly[1]
Oxidation-reduction potential	milivolts		• Bi-weekly/Quarterly[1]
Dissolved Oxygen	µg/L	Grab	• Bi-weekly/Quarterly[1]
Dissolved ferrous iron	µg/L	Grab	• Bi-weekly/Quarterly[1]
Total Chromium and chromium six [2]	µg/L	Grab	• Bi-weekly/Quarterly[1]
PH	pH units	Grab	• Bi-weekly/Quarterly[1]
Temperature	^{0}F/^{0}C	Grab	• Bi-weekly/Quarterly[1]
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Bi-weekly/Quarterly[1]

[1] One week before injection; Bi-weekly for the first month following injection; and Quarterly thereafter

[2] The Discharger is required to monitor for total chromium and chromium six only when they are detected in the baseline test.

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. Quarterly 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)

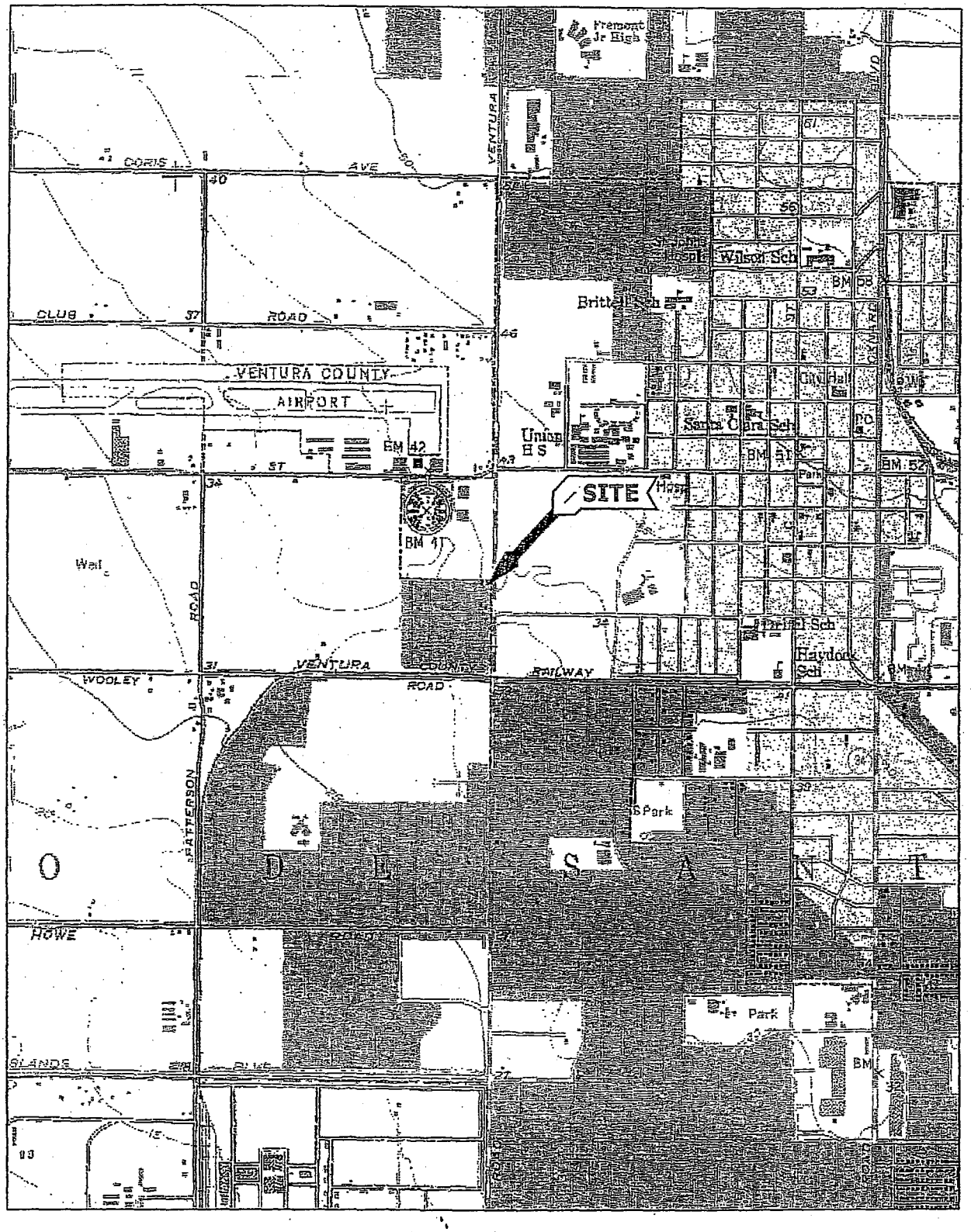
_____(Title)"

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.

Ordered by: _____
Jonathan S. Bishop
Executive Officer

Date: April 3, 2007



SCALE - 1" = 2000' AT 8.5" x 11"

Applied Environmental Technologies, Inc.
4561 Market Street, Suite B • Ventura, California 93003
Phone (805)650-1400 Fax (805)650-1576

SITE LOCATION MAP

877 SOUTH VENTURA ROAD
OXNARD, CALIFORNIA

PLATE REFERENCE 139901A1A | PROJECT NUMBER 1399-01

PLATE 1

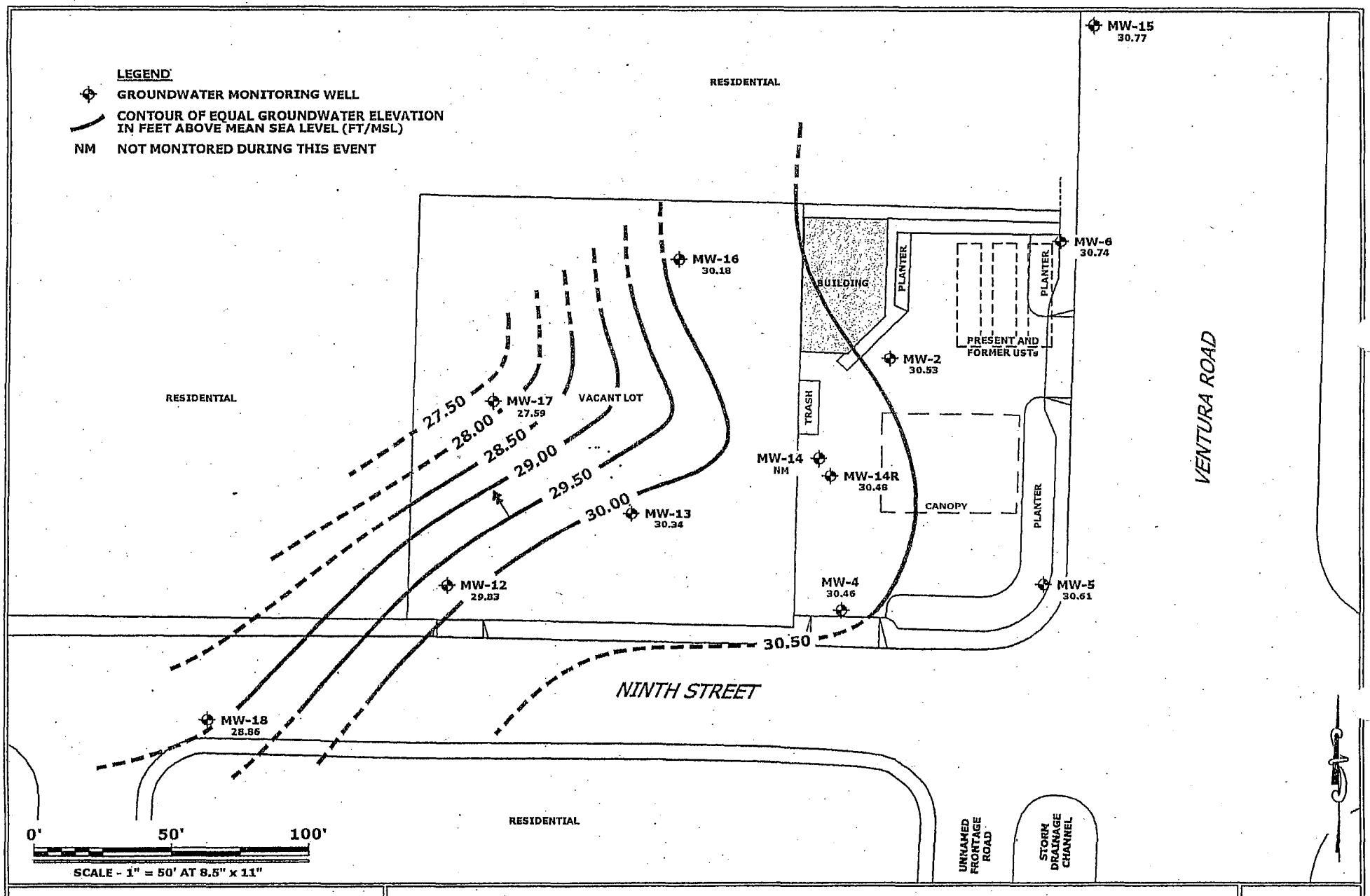
Applied Environmental Technologies, Inc.
4561 Market Street, Suite B • Ventura, California 93003
Phone (805)650-1400 Fax (805)650-1576

SITE PLAN SHOWING FENTON'S REAGENT INJECTION AND MONITORING WELLS
877 SOUTH VENTURA ROAD
OXNARD, CALIFORNIA

FILE NUMBER 1399001AQX | MARCH 20, 2007

PROJECT 1399-01

PLATE 2



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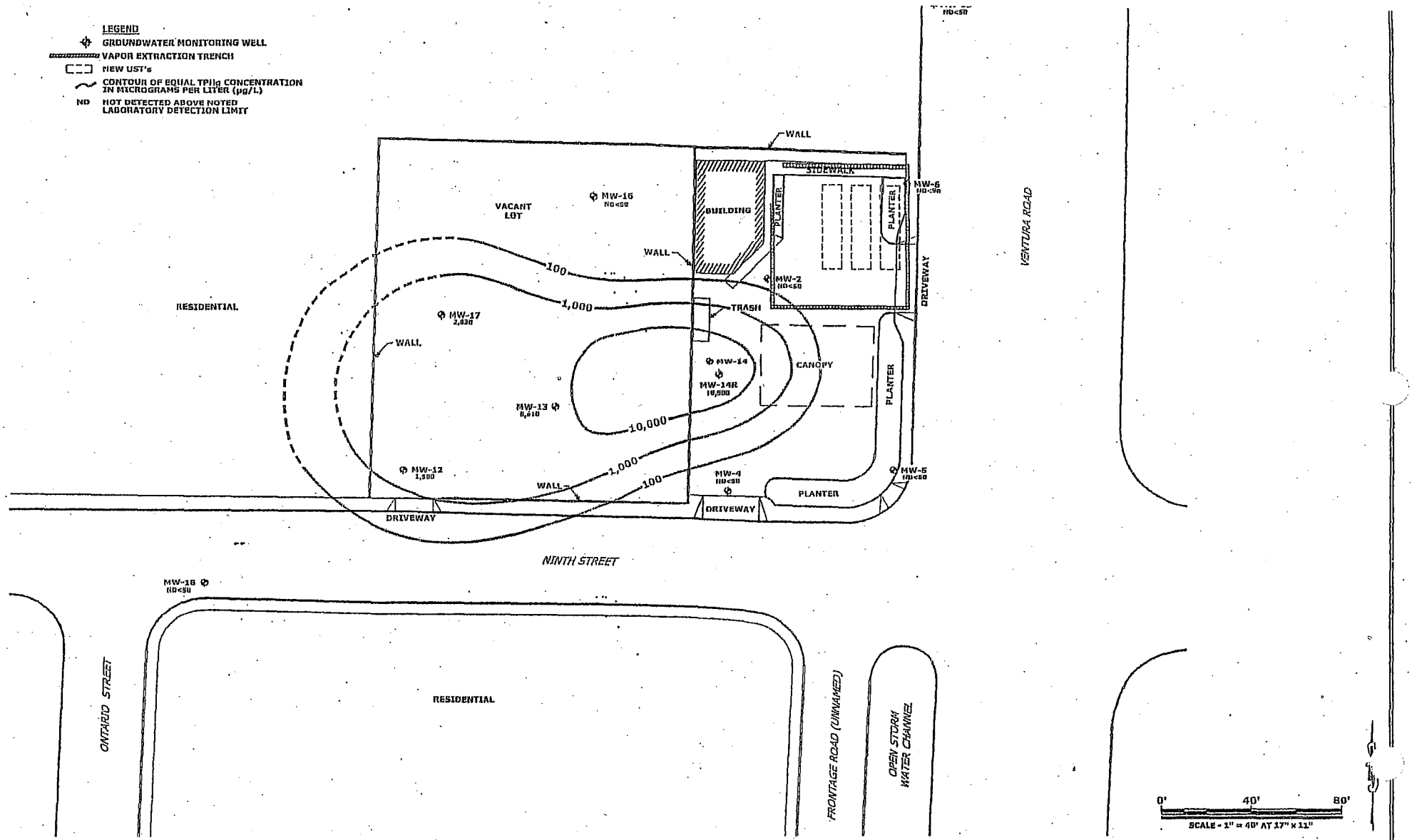
Phone (805)650-1400 Fax (805)650-1576

GROUNDWATER ELEVATION CONTOUR MAP
MARCH, 2006
877 SOUTH VENTURA ROAD
OXNARD, CALIFORNIA

PLATE REFERENCE 139901Q1B	MAY 22, 2006	PROJECT NUMBER 1399-01

PLATE 3



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ISO-CONCENTRATION CONTOUR MAP OF TPHg IN GROUNDWATER (µg/L) - SEPTEMBER, 2005
FORMER PUNJAB
877 SOUTH VENTURA ROAD
OXNARD, CALIFORNIA

PLATE REFERENCE 139901A2C | NOVEMBER 3, 2005 | PROJECT NUMBER 1399-01

PLATE 4