

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

January 7, 2014

Mr. Marvin Kalin
3800 Encino Hills Place
Encino, CA 91436

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7012 1640 0000 6228 4618

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT
PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR
HEXAVALENT CHROMIUM IMPACTED SITES
SANTA PALM CAR WASH
8787 WEST SANTA MONICA BOULEVARD, WEST HOLLYWOOD
(I.D. NO. 900690052A)(USTCF #18883)(Priority B-2)**

Dear Mr. Kalin:

We have completed our review of the application for coverage under the General Waste Discharge Requirements to apply chemical oxidant at the site referenced above in West Hollywood, California, for groundwater cleanup and remediation. The application was prepared by your consultant JHA Environmental, Inc. (JHA).

In 2003, the gasoline underground storage tanks (USTs), dispenser islands and associated piping were removed. Between 2003 and 2010, eight groundwater monitoring wells were installed in the onsite and offsite area. In March 2010 and May 2011, JHA conducted mobile dual-phase extraction (DPE) to clean up the residual soil and groundwater contamination. In April 2013, JHA conducted enhanced groundwater purging from wells MW-3 and MW-4. Based on the latest groundwater monitoring data collected in June 2013, the maximum benzene and methyl tertiary butyl ether (MTBE) concentrations of 4,400 ug/L and 110 ug/L were detected, respectively.

JHA proposes to conduct in-situ chemical oxidation to further reduce the benzene concentrations in groundwater. JHA originally proposed to inject catalyzed hydrogen peroxide (CHP) to clean up the residual petroleum hydrocarbons. The remedial action plan was approved by the Regional Board on September 30, 2013. JHA has subsequently changed the proposed chemical from CHP to PersulfOX (activated sodium persulfate). Two percent of sodium silicate will be the activator. JHA's modification of the injected chemical from CHP to PersulfOX is hereby approved.

JHA proposes to conduct two-to-four rounds of pilot tests of PersulfOX injection through injection points in area wells MW3 and MW4. PersulfOX will be injected into 25 boreholes using direct-push technology. Within each borehole, PersulfOX will be injected between 16 and 24 feet below ground surface (bgs) to target regions of the vadose zone contaminated area. Approximately 10% solution (from a mixture of 8,000 pounds of PersulfOX) will be injected.

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. These Waste Discharge Requirements shall not be terminated without Regional Board's prior approval.

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019, and Monitoring and Reporting Program (MRP) No. CI-10007 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-10007, 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.

In accordance with regulations adopted by the State Water Resource Control Board (State Board) in September 2004 regarding electronic submittal of information (ESI), Santa Palm Carwash has been electronically submitting Underground Storage Program (UST) technical reports to the State Board Geotracker under the UST ID# T0603743956. To comply with this MRP, the Discharger shall upload the MRP reports to the Geotracker under the ID# WDR100014438. For more information regarding the new Global ID under WDRs, please see ESI training video at:

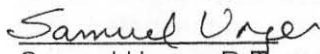
<https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>.

To avoid paying future annual fees, please submit a 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/html/permits/gen_orders/R4-2007-0019/R4-2007-0019.pdf.

If you have any questions, please contact Dr. Eric Wu at (213) 576-6119 or send him an email at ewu@waterboards.ca.gov for administrative issues and Mr. Jay C. Huang at (213) 576-6711 or send him an email at jhuang@waterboards.ca.gov for technical issues.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures: 1. Board Order No. R4-2007-0019
2. Monitoring and Reporting Program No. CI-10007
3. Standard Provisions Applicable to WDRs

Cc Kathy Jundt, State Water Resources Control Board, Underground Storage Tank
Cleanup Fund
Phuong Ly, Water Replenishment District of Southern California
Tim Smith, Los Angeles County Department of Public Works, Environmental Program
Division
Richard Lavin, Los Angeles County Department of Public Health, Environmental Health
Drinking Water Program
Wally Jensky, JHA Environmental, Inc.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-10007
FOR
SANTA PALM CAR WASH
8787 WEST SANTA MONICA BOULEVARD, WEST HOLLYWOOD
(I.D. NO. 900690052A)(USTCF #18883)
(ORDER NO. R4-2007-0019, SERIES NO. 240)

I. REPORTING REQUIREMENTS

- A. Santa Palm Car Wash (hereinafter Discharger) shall implement this monitoring program on the effective date of of this Monitoring and Reporting Program (MRP). The first monitoring report under this program, for January-June 2014, shall be received at the Regional Board by July 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 – 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. By January 30 of each year, beginning January 30, 2015, 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).
- C. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health 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

January 7, 2014

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 Public Health, 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 the Executive Officer's written approval.

- L. In accordance with regulations adopted by the State Board regarding electronic submittal of information (ESI), the Discharger has been electronically submitting UST monitoring reports to the State Board GeoTracker system under the UST ID T0603743956. To comply with the (MRP) under this WDRs, the Discharger shall upload the WDRs monitoring reports to the Geotracker under the two ID T0603743956 (continuing) and WDR100014438 (new).

II. Chemical Oxidant (PulsulfOx®) MONITORING REQUIREMENTS

The semi-annual reports shall contain the following information regarding injection activities:

1. Location map showing placement locations, used for the chemical oxidant (PulsulfOx®) (refer to attached Figure 1 for site map).
2. Written and tabular summary defining the quantity of chemical oxidant injected 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 PersulfOx® delivered per location	grams	--	• Semi-annually

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from up-gradient area groundwater monitoring wells MW-2 and MW-6; source area groundwater monitoring wells MW-3 and MW-4; and down-gradient area groundwater monitoring wells MW-5, and MW-7 (Figure 1) on a semi-annual schedule to monitor the effectiveness of the in-situ groundwater remediation. Groundwater shall be monitored for the duration of the remediation before and after the injection of chemical oxidant in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS ¹	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg)	µg/L	Grab	• Semi-annual

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

- 1 µg/L=microgram per liter; mg/L=milligrams per liter.
- 2 The Discharger is required to monitor for these compounds only if they are detected in the first sampling event.
- 3 The Discharger is required to monitor for total chromium and chromium six only if they are detected in the first and third semi-annual sampling events.

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-annual 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.

VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall submit all reports under this MRP to the State Water Resources Control Board's Geotracker database under the Global ID WDR 100000842.

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

Date: January 7, 2014