



Los Angeles Regional Water Quality Control Board

August 30, 2021

H.K. Town LLC and 124 Western LLC
Attn: Dale Kim
1025 South Berendo Street, #100
Los Angeles, CA 90006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO: 7021 0350 0001 7987 3157

GENERAL WASTE DISCHARGE REQUIREMENTS FOR IN-SITU GROUNDWATER REMEDICATION AND GROUNDWATER RE-INJECTION

**HK MARKET
124 NORTH WESTERN AVENUE
(CASE NO. 900040452, GLOBAL ID NO. T1000000748, WDR100053934)**

Dear Mr. Kim:

We are in receipt of your application for coverage under General Waste Discharge Requirements (WDRs) to inject catalyzed persulfate for in-situ chemical oxidation (ISCO) groundwater remediation.

The HK Market facility (Site), currently a commercial grocery store, is located at 124 North Western Avenue, at the northeastern corner of the intersection of North Western Avenue and West First Street, in Los Angeles, California (Figures 1 and 2). The most recent groundwater monitoring data (December 2020) reported maximum concentrations of 23,000 micrograms per liter ($\mu\text{g/L}$) of total petroleum hydrocarbons as gasoline (TPHg), 4,200 $\mu\text{g/L}$ of TPH as diesel (TPHd), 4,900 $\mu\text{g/L}$ of benzene, and 51 $\mu\text{g/L}$ of tertiary butyl alcohol (TBA), while methyl tertiary butyl ether (MTBE) was not detected. A petroleum sheen was reported in monitoring wells MW-3 and MW-4. The depth to groundwater is approximately 10 feet below ground surface (bgs).

On January 25, 2021, California Environmental (CE) submitted the document "Supplemental Remedial Action Plan Treatment of Residual Benzene in Groundwater by In-Situ Chemical Oxidation" (RAP) on behalf of 124 Western LLC (Discharger). The RAP proposed injecting catalyzed persulfate (sodium persulfate, with sodium silicate and silicic acid activator, and sodium salt as a buffer solution and pH adjuster) at depths of 15 to 20 feet bgs at seven locations, two of which are in the former underground storage tank (UST) excavation pit location and five of which are 5 to 15 feet south (downgradient). On

LAWRENCE YEE, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

February 22, 2021, the Regional Water Quality Control Board - Los Angeles (Regional Water Board) approved the RAP.

Regional Water Board staff has completed our review of your application and determined that the proposed injection activities meet the conditions specified in Order No. R4-2014-0187, "*General Waste Discharge Requirements for In-Situ Groundwater Remediation and Groundwater Re-Injection*" adopted by the Regional Water Board on September 11, 2014.

Sodium persulfate is permitted as a chemical oxidant, sodium silicate and silicic acid as activator compounds, and sodium salt as a buffer solution and pH adjuster in the General WDRs, Order No. R4-2014-0187. To avoid material surfacing, refer to:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/Subsurface_injection_of_ISRR.pdf.

Enclosed are your WDRs, consisting of Regional Board Order No. R4-2014-0187 (available online at:

http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/docs/GeneralWDRR4-2014-0187.pdf), the Monitoring and Reporting Program (MRP) No. CI-10606 (attached), and Standard Provisions. Enrollment in the WDRs shall not be terminated until Regional Water Board staff determines the WDRs are no longer needed for the site cleanup.

When submitting technical monitoring reports per the WDRs to the Regional Board, you are required to reference Compliance File No. CI-10606 to ensure that the reports are directed to the appropriate file and staff. Do not combine other reports with your technical WDR monitoring reports. Submit each type of report as a separate document.

In accordance with regulations adopted by the State Water Resources Control Board (State Water Board) regarding electronic submittal of information, UST Program monitoring reports have been electronically submitted to the State Water Board GeoTracker database under the UST Global ID No. T1000000748. To comply with the MRP under the WDR, you shall upload the WDR monitoring reports to the State Water Board GeoTracker database under both Global ID Nos. T1000000748 (existing) and WDR100053934 (new).

Please see Electronic Submittal for GeoTracker Users, dated December 12, 2011, at: <https://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%20Users.pdf>.

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 1st and ending June 30th, 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 1st.

August 30, 2021

If you have any questions, please contact Dr. Ann Chang at (213) 620-6122 or by email at ann.chang@waterboards.ca.gov for issues regarding the WDRs and Mr. Dave Bjostad at (213) 576-6712 or by email at dave.bjostad@waterboards.ca.gov for issues regarding the USTs.

Sincerely,

R Purdy  Digitally signed by R Purdy
Date: 2021.08.29 15:15:17
-07'00'
Water Boards

Renee Purdy
Executive Officer

Enclosures:

1. Figure 1, Vicinity Map
2. Figure 2, Plot Plan
3. Regional Board General WDR Order No. R4-2014-0187, including standard provisions
4. Monitoring and Reporting Program CI No. 10606

copy by e-mail:

Eloy Luna, Los Angeles City Fire Department, Underground Storage Tanks
Royce Long, Los Angeles City Fire Department, CUPA Manager
Charles Buckley, California Environmental

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

MONITORING AND REPORTING PROGRAM NO. CI-10606

FOR

HK MARKET

**124 NORTH WESTERN AVENUE, LOS ANGELES, CA
(IN-SITU CHEMICAL OXIDANT COMPOUNDS INJECTIONS FOR GROUNDWATER
CLEANUP)
(ORDER NO. R4-2014-0187, SERIES NO. 164)**

I. REPORTING REQUIREMENTS

- A. H.K. Town LLC and 124 Western LLC (hereinafter Discharger) shall implement this monitoring program on the effective date of this Monitoring and Reporting Program (MRP). The first monitoring report under this MRP, for the period from July 2021 to December 2021, shall be received at the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) by **January 15, 2022**. Subsequent monitoring reports shall be received at the Regional Water Board according to the following schedule:

| <u>Monitoring Period</u> | <u>Report Due Date</u> |
|--------------------------|------------------------|
| January – June | July 15th |
| July – December | January 15th |

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP to the State Water Resources Control Board (State Water Board) GeoTracker database, Attention: Information Technology Unit.

If there is no discharge or injection during any reporting period, the report shall so state.

- B. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Board Division of Drinking Water - 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.
- C. 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 Water 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 Water Board.

- D. 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 Water Board staff.
- E. Each monitoring report must affirm in writing "All analyses were conducted at a laboratory certified for such analyses by the State Water Board ELAP 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.
- F. 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 Waste Discharge Requirements (WDR). This section shall be located at the front of the report and shall clearly list all non-compliance with WDR, as well as all excursions of effluent limitations.
- G. 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 Water Board.
- H. If the Discharger performs analyses on any groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.
- I. 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.
- J. The Discharger should not implement any changes to the MRP prior to receiving Executive Officer's written approval.
- K. In accordance with regulations adopted by the State Water Board regarding electronic submittal of information, UST monitoring reports have been electronically submitted to the State Water Board GeoTracker database under the UST Global ID T1000000748. To comply with the MRP under this WDR, the Discharger shall upload the WDRs monitoring reports to the GeoTracker database under both Global ID Nos. T1000000748 (existing) and WDR100053934 (new).

II. INJECTION MONITORING REQUIREMENTS

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

1. Groundwater monitoring wells shall not be used as injection points to avoid reduction of the groundwater monitoring network, data bias, well screen clogging and alteration. Separate injection points must be installed for the permanent fill borings with proposed anaerobic degradation enhancement compounds.
2. A location map showing placement locations used for the chemical oxidant compound injections (refer to attached Figure 1 for site map).
3. Written and tabular summary defining the quantity of sodium persulfate, sodium silicate, silicic acid, and sodium salt injected to the groundwater and a summary describing the day(s) on which the permeable fill borings were installed.

| Constituent | Units | TYPE OF SAMPLE | MINIMUM FREQUENCY OF ANALYSIS¹ |
|--|--------------------------------------|-----------------------|--|
| Sodium persulfate, sodium silicate and silicic acid activator, and sodium salt | Gallons or weight, and Concentration | -- | Semi-Annually |

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected, at a minimum, from MW-4 and MW-5 in the injection area, MW-2 (cross-gradient), and MW-3 offsite to the south-southwest (Figure 1, In-Situ Injection Plan) 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 in accordance with the following monitoring program:

| Constituent | Units | TYPE OF SAMPLE | MINIMUM FREQUENCY OF ANALYSIS¹ |
|---|-------------------|-----------------------|--|
| Total petroleum hydrocarbons as gasoline (TPHg) | µg/L ³ | Grab | Semi-Annually |
| Benzene, Toluene, Ethylbenzene, Xylenes (BTEX) | µg/L | Grab | Semi-Annually |

| | | | |
|--|--|---------|---------------|
| Naphthalene, Ethanol Formaldehyde, Acetone | µg/L | Grab | Semi-Annually |
| Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), Ethyl tertiary butyl ether (ETBE) | µg/L | Grab | Semi-Annually |
| Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese | mg/L ⁴ | Grab | Semi-Annually |
| Oxidation-reduction potential (ORP) | Millivolts | Grab | Semi-Annually |
| Dissolved Oxygen | µg/L | Grab | Semi-Annually |
| Dissolved Ferrous Iron | µg/L | Grab | Semi-Annually |
| Total Chromium and Hexavalent Chromium ² | µg/L | Grab | Semi-Annually |
| pH | pH units | Grab | Semi-Annually |
| Temperature | °F/°C | Grab | Semi-Annually |
| Groundwater Elevation | Feet, mean sea level and below ground surface | In situ | Semi-Annually |

1. One week before injection and semi-annually thereafter.
2. The Discharger is required to monitor for total chromium and hexavalent chromium in the baseline, second and fourth semi-annual sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored semi-annually thereafter.
3. µg/L = microgram per liter.
4. mg/L = milligram per liter.

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 calculated groundwater flow direction.

IV. MONITORING FREQUENCIES

Specifications in the MRP are subject to periodic revisions. 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 Regional Water Board, upon request by interested parties.

Ordered by: 
Renee Purdy
Executive Officer

Date: August 30, 2021