



California Regional Water Quality Control Board

Los Angeles Region

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Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>

October 24, 2003

Mr. Milton Shapiro
Victory Investment Co., Inc.
7610 Woodrow Wilson Drive
Los Angeles, CA 90046

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7000 0520 0020 1693 5503

Dear Mr. Shapiro:

GENERAL WASTE DISCHARGE REQUIREMENTS FOR HRC INJECTION PILOT TEST AT PETROLEUM HYDROCARBON FUEL AND/OR VOLATILE ORGANIC COMPOUND IMPACTED SITES – MASTER SUN CLEANERS, 2405 W. ROSECRANS AVENUE, GARDENA, CALIFORNIA (FILE NO. 03-085, CI NO. 8606)

We have completed our review of your application for coverage under General Waste Discharge Requirements to inject Hydrogen Release Compound (HRC[®]) at the site to test its effectiveness for the bio-remediation of the volatile organic compounds contaminated groundwater.

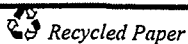
Victory Investment Co., Inc (hereinafter Discharger) owns Master Sun Cleaners (Site) located at 2405 W. Rosecrans Avenue in Gardena, California (Figure 1). Master Sun Cleaners has been operating a dry cleaning business since January 1966. The Site is flanked by the LAX Beauty Center to the east and a vacant shop to the west. The north and south areas of the Site are paved with asphalt and are used for parking and delivery access. Soil assessments conducted at the Site from 1997 to 1999 indicated the presence of volatile organic compounds (VOCs) including tetrachloroethene (PCE) in the soil with concentrations ranging from 7,300,000 micrograms per kilogram ($\mu\text{g}/\text{Kg}$) to non-detected.

Six groundwater monitoring wells were installed on-site (MW-1 through MW-6). PCE was detected in Wells MW-1 and MW-2 (closest wells to the source area) with concentrations of 32,000 $\mu\text{g}/\text{L}$ (1998) and 26,000 $\mu\text{g}/\text{L}$ (1999), respectively. PCE was also detected in Well MW-6 (upgradient well) at 4.4 $\mu\text{g}/\text{L}$ (1999). Additional onsite groundwater assessments conducted from monitoring wells MW-7d, MW-7s, PM-1 and PM-2 in October 2000 indicated the presence of 4,100 $\mu\text{g}/\text{L}$, 4,500 $\mu\text{g}/\text{L}$, 8,100 $\mu\text{g}/\text{L}$ and 7,500 $\mu\text{g}/\text{L}$ of PCE, respectively. Off-site groundwater assessments performed between October 2000 and August 2001 indicated the presence of up to 1,700 $\mu\text{g}/\text{L}$ and 150 $\mu\text{g}/\text{L}$ of PCE in hydropunch borings HP-11 and HP-21, respectively. Both borings are located to the south of the Site indicating the VOC plume has migrated offsite.

On April 28, 2003, the Discharger submitted the "Hydrogen Release Compound Injection Field Pilot Test Execution Plan" (Plan) proposing to inject HRC[®] at the site to test its effectiveness for the bio-remediation of the volatile organic compounds contaminated groundwater. Results of the pilot test will be used for design of a full-scale application of HRC[®] downgradient from the contaminant source area. Regional Water Quality Control Board staff (Mr. Dixon A. Oriola, Well Investigation Program) approved the Plan on July 2, 2003.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

The Site is located in the Los Angeles Coastal Plain - West Coast Basin. The groundwater occurs in Recent and Pleistocene aquifers throughout the West Coast Basin. The perched aquifer, consisting of Zone A (up to 80 feet bgs) and zone B (from 80 to 140 feet bgs) of the Bellflower Aquiclude, and the Gage Aquifers are present beneath the Site. Perched groundwater is encountered at approximately 22 feet bgs. Groundwater flow direction is to the south at a gradient of approximately 0.0023 feet per foot (Figure 2). Groundwater contamination is detected in Zone A (up to 42.5 feet bgs).

The pilot test will be conducted in an 6 feet wide by 15 feet long area located approximately 400 feet to the south of the subject site (Figure 3). The HRC[®] will be applied to the saturated zone using a single stroke R.E. RUPE Company Model ORC/HRC 9-1500 injection pump. The injection rate of HRC[®] will be 12 to 15 pounds of HRC[®] per vertical foot per injection point. HRC[®] will be injected into the perched zone (Zone A) which is divided into four injection intervals per probe (37 to 42 feet bgs, 32 to 37 feet bgs, 27 to 32 feet bgs, and 22 to 27 feet bgs). A total of 240 to 300 pounds of HRC[®] per injection point will be injected resulting in a total of 1,200 to 1,500 pounds of HRC[®] for the entire injection field. The anticipated duration of the entire injection process, is not more than 12 hours. Baseline groundwater sampling for VOCs and biological parameters will be conducted on the pilot study monitoring wells MW-9 (upgradient), MW-10 (downgradient), and MW-14 (treatment area) (Figure 3). A six-month monitoring program will be conducted after the injection using monitoring wells MW-9, MW-10, and MW-14 to evaluate the applicability of HRC[®] to increase chlorinated hydrocarbon biodegradation rates.

If the pilot or feasibility test is determined to be successful and a full-scale treatment system is proposed for site cleanup, then the following is required:

- a. A final Remedial Action Plan (RAP) is to be submitted to the Regional Board for review and approval prior to its implementation; and
- b. A revised Report of Waste Discharge (ROWD) is to be submitted for the full-scale treatment system.

Regional Board staff will review the revised ROWD to determine if it is complete or if additional information is needed. In addition, upon receipt of a complete ROWD, the Monitoring and Reporting Program will be revised to incorporate the approved full-scale treatment plan.

Any potential adverse water quality impacts that may result shall be localized, of short-term duration, and shall not impact any existing or prospective uses of groundwater. Groundwater quality shall be monitored to verify no long-term adverse impact to water quality. There may be small increases associated with soluble gases such as methane, ethane, ethene, and carbon dioxide. The Site is located in the City of Gardena at Latitude: 33° 54' 7" and Longitude: 118° 19' 8". The quantities of HRC[®] injected shall be documented per the Monitoring and Reporting Program No. CI-8606.

Regional Board staff have reviewed the information provided and have determined that the proposed discharge meets the conditions specified in Order No. R4-2002-0030, "General

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Mr. Milton Shapiro
Victory Investment Co., Inc.

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October 24, 2003

Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel and/or Volatile Organic Compound Impacted Sites," adopted by this Regional Board on January 24, 2002.

Enclosed are your Waste Discharge Requirements, consisting of Regional Board Order No. R4-2002-0030 (Series No. 028) and Monitoring and Reporting Program No. CI-8606 and Standard Provisions. Please note that the discharge limits in Attachment A (Los Angeles Coastal Plain - West Coast Basin) of Order No. R4-2002-0030 are applicable to your discharge.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment (October 24, 2003) under Regional Board Order No. R4-2002-0030. 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-8606, 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. R4-2002-0030 only to the applicant. A copy of the Order will be furnished to anyone who requests it.

If you have any additional questions, please contact Mr. David Koo at (213) 620-6155.

Sincerely,



Dennis A. Dickerson
Executive Officer

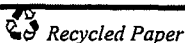
Enclosures:

1. Board Order No. R4-2002-0030
2. Monitoring and Reporting Program No. CI-8606
3. Standard Provisions Applicable to Waste Discharge Requirements (addressee only)

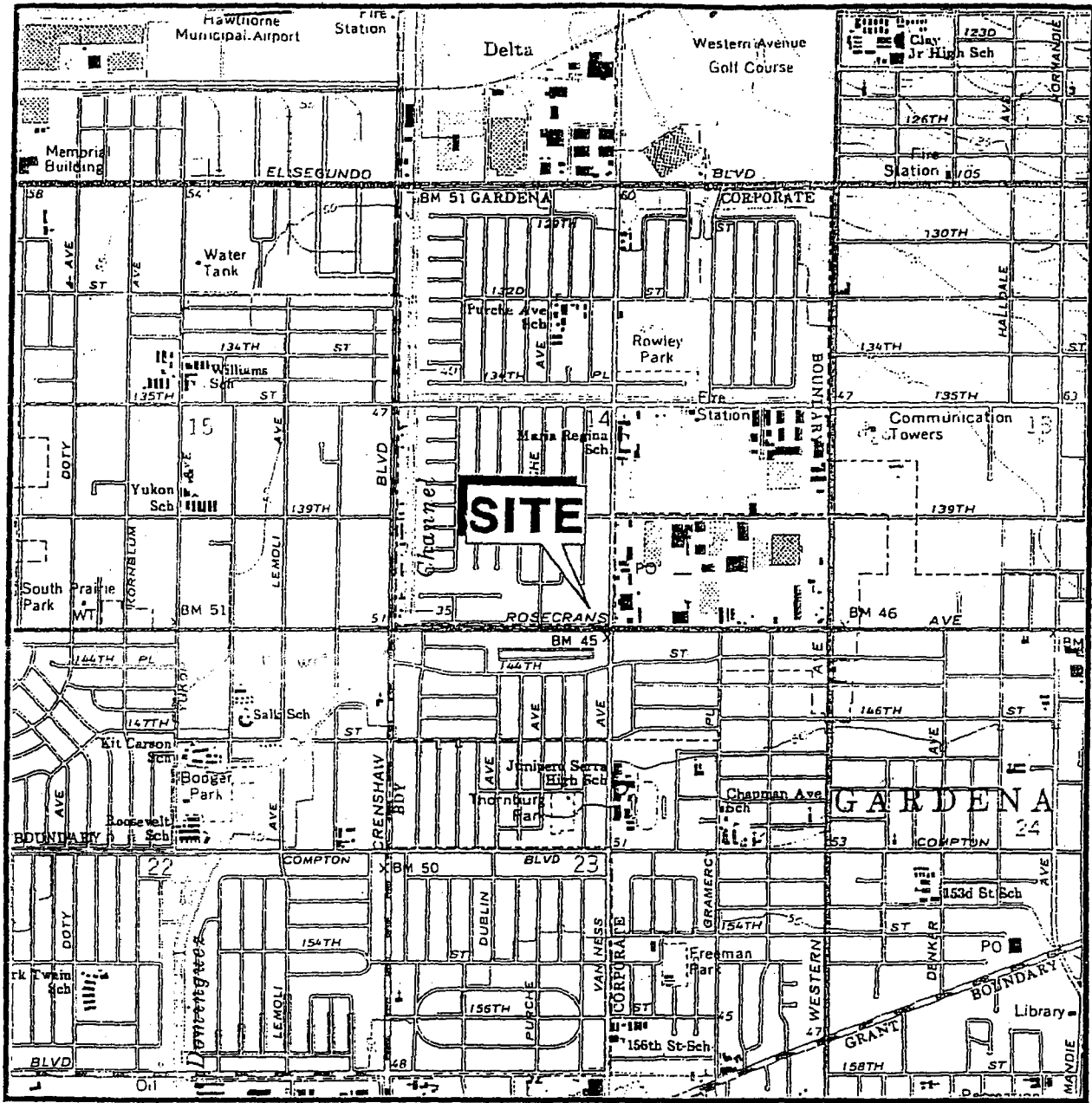
cc: Mr. Robert Sams, Office of Chief Counsel, State Water Resources Control Board
Mr. Michael Lauffer, Office of Chief Counsel, State Water Resources Control Board
Mr. John J. Moura, Esq., Sinnott, Dito, Moura, & Puebla
Mr. Albert M. Cohen, Smiland & Khachigian
Mr. Adrienne D. Cohen, Esq., Law Offices of Adrienne D. Cohen
Mr. Robert H. Black, Esq., Black, Compean & Hall
Mr. Robert Ehe, Los Angeles Regional Water Quality Control Board –
Well Investigation Program
Mr. Fred Clark, The Source Group, Inc.

California Environmental Protection Agency

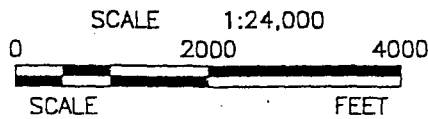
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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



SOURCE: U.S.G.S. 7.5 MINUTE SERIES TOPOGRAPHIC MAPS
 INGLEWOOD QUADRANGLE
 DATED 1964, PHOTOREVISED 1981



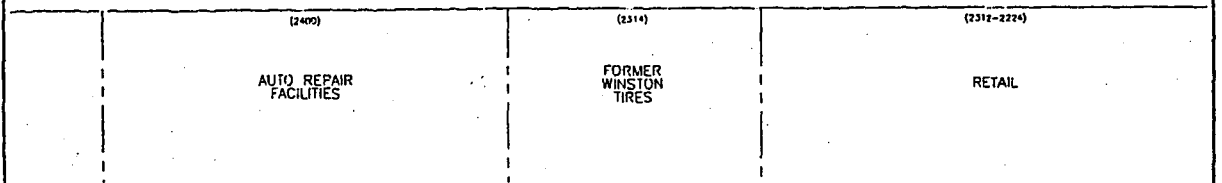
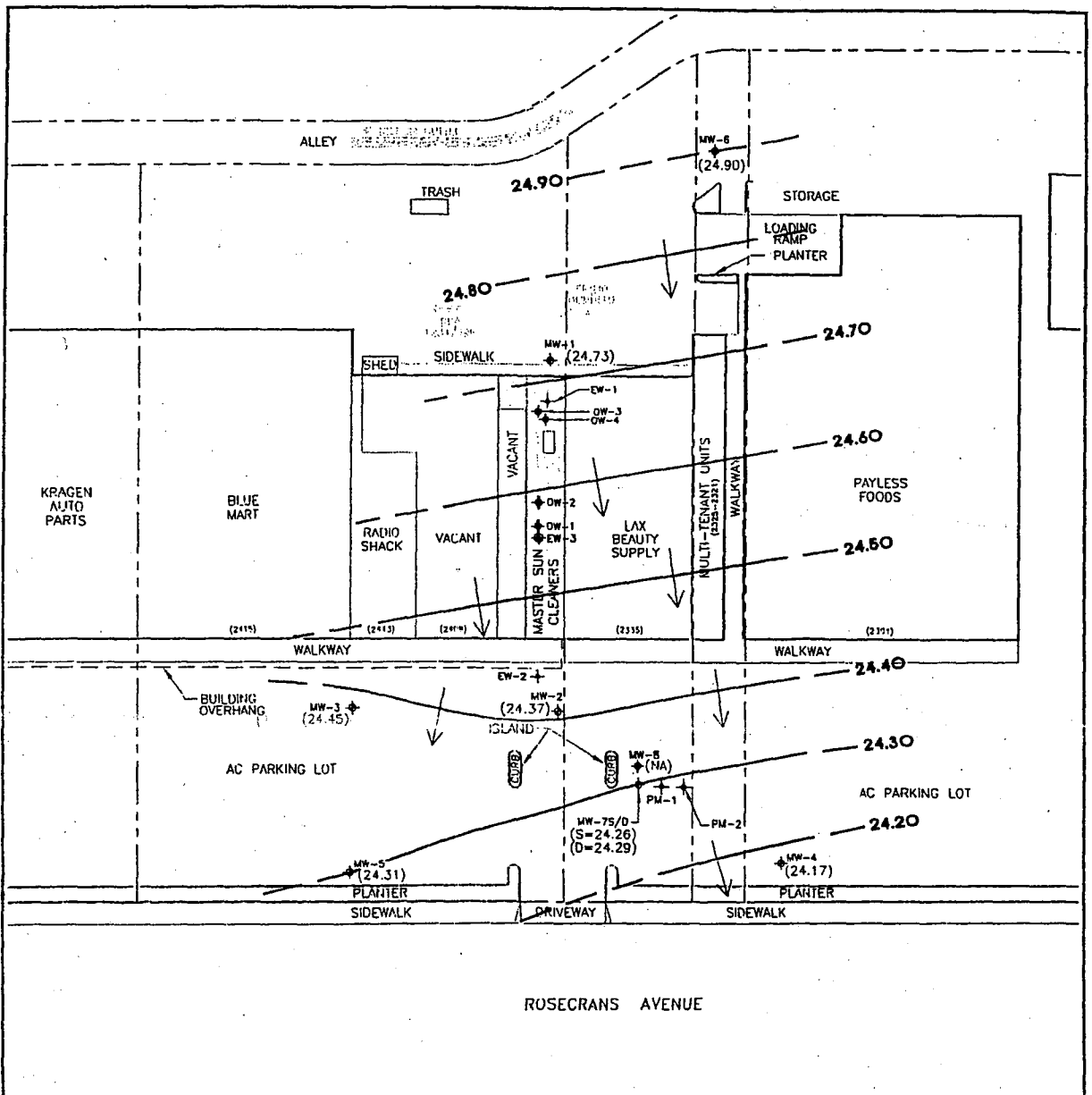
The Source Group, Inc.
 501 MARIN STREET, SUITE 112B
 THOUSAND OAKS, CA 91360

SITE LOCATION MAP

MASTER SUN CLEANERS
 2405 WEST ROSECRANS AVENUE
 GARDENIA, CALIFORNIA

FIGURE

1



GENERAL SITE LEGEND

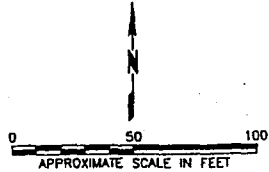
- SITE PROPERTY/PARCEL LINE
- (2400) PROPERTY STREET ADDRESS
- ◆ MONITORING WELL LOCATION AND NUMBER
- + PIEZOMETER LOCATION AND NUMBER
- ◆ OBSERVATION WELL LOCATION AND NUMBER
- ◆ ANGLED EXTRACTION WELL LOCATION AND NUMBER
- + EXTRACTION WELL LOCATION AND NUMBER

GROUNDWATER MONITORING LEGEND

- (24.73) GROUNDWATER ELEVATION FOR PERCHED ZONE IN FEET ABOVE MEAN SEA LEVEL (DATA COLLECTED 6/19/02)
- GROUNDWATER CONTOUR ARROWS INDICATE DIRECTION OF GROUNDWATER FLOW (GROUNDWATER CONTOUR INTERVAL = 0.10' (DASHED WHERE INFERRERD))
- (NA) NOT APPLICABLE, SHALLOW AQUIFER MONITORING WELL LOCATION
- MW-75/D S=SHALLOW (TOTAL DEPTH 33.1') D=DEEP (TOTAL DEPTH 42.9')
- (NS) NOT SAMPLED

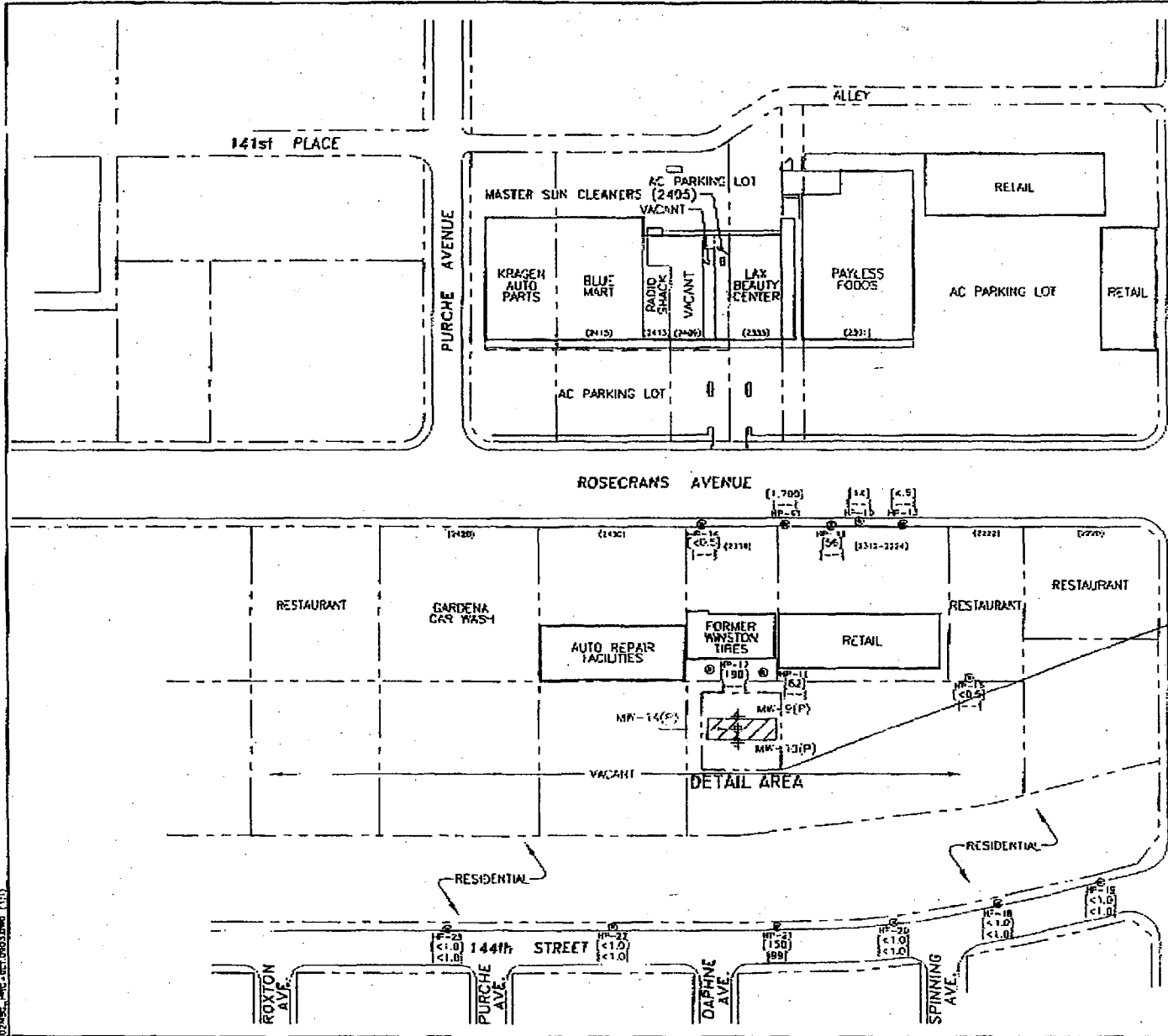
GENERAL SITE NOTES:

1. SOURCE: LOS ANGELES COUNTY ASSESSORS PARCEL MAP, POR. S.W. 1/4 SEC. 14, DETAIL SITE FEATURES SURVEYED BY AZIMUTH GROUP, ON FEBRUARY 19, 2001.

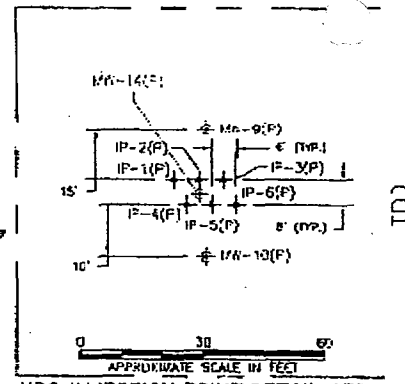


DATE: 09/02	FILE NAME: 02MSC_GW02-3	PROJECT NO.: 02-MSC-002
GROUNDWATER GRADIENT MAP FOR PERCHED ZONE MASTER SUN CLEANERS 2405 WEST ROSECRANS AVENUE GARDENA, CALIFORNIA		
The Source Group, Inc.		FIGURE: 2

02MSC_GW02-3 (11)



- GENERAL SITE LEGEND**
- SITE PROPERTY/PARCEL LINE
 - - - - APPROXIMATE FENCE LOCATION
 - (2405) PROPERTY STREET ADDRESS
 - ⊙ HYDROPUNCH BORING LOCATIONS
 - (14) PCE CONCENTRATIONS IN GROUNDWATER SHOWN IN MICROGRAMS PER LITER (µg/l)
 - (150) PCE CONCENTRATIONS FOR [SHALLOW AND [DEEPER] SAMPLES IN PERCHLORATE GROUNDWATER ZONES
 - DATA NOT AVAILABLE
 - ⊕ PROPOSED GROUNDWATER MONITORING WELL LOCATION
 - + PROPOSED HRC INJECTION POINT LOCATION
 - ▨ PROPOSED HRC TREATMENT AREA



- GENERAL SITE NOTES:**
- SOURCE: LOS ANGELES COUNTY ASSESSORS PARY MAP, PDR, S.W. 1/4 SEC. 14 DETAIL SITE FEATURE SURVEYED BY AZIMUTH GROUP, ON FEBRUARY 19, 2003
 - INTERNAL BUILDING FEATURES AND LOCATIONS ARE APPROXIMATE. FEATURES AND LOCATIONS BASED ON FIELD RECONNAISSANCE BY THE SOURCE GROUP.

APPROXIMATE SCALE IN FEET

DATE:	FILE NAME:	PROJECT NO.:
09/03	02MSC_HRC-DET	02-MSC-007

PROPOSED HRC TREATMENT AREA AND INJECTION POINT DETAIL
 MASTER SUN CLEANERS
 2405 WEST ROSECRANS AVENUE
 GARDENA, CALIFORNIA

The Source Group, Inc. FIGURE: 3

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

**MONITORING AND REPORTING PROGRAM NO. CI-8606
FOR
VICTORY INVESTMENTS CO., INC.
(MASTER SUN CLEANERS)**

**ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2002-0030 (Series No. 028)
FILE NO. 02-189**

I. REPORTING REQUIREMENTS

- A. The Discharger shall implement this monitoring program on the effective date of this enrollment (October 24, 2003) under Regional Board Order No. R4-2002-0030. The first monitoring report under this Program is due by January 15, 2004.

Monitoring reports shall be received by the dates in the following schedule:

<u>Reporting 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. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.
- C. 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.
- D. 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. This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements, as well as all excursions of effluent limitations.
- E. The Discharger shall comply with requirements contained in Section G of Order No. R4-2002-0030 "*Monitoring and Reporting Requirements*" in addition to the aforementioned requirements.

II. HYDROGEN RELEASE COMPOUND (HRC®) INJECTION MONITORING REQUIREMENTS

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

1. Location Map showing the injection points for the HRC®;
2. Written summary defining:
 - Depth of injection points;
 - Quantity of HRC® injected per injection point and per vertical spacing at each point; and
 - Total amount of HRC® injected.

III. GROUNDWATER MONITORING PROGRAM

A groundwater monitoring program shall be designed to detect and evaluate impacts associated with the HRC® injection activities. The following shall constitute the monitoring program for Monitoring Well Nos. MW-9, MW-10, and MW-14. These sampling stations shall not be changed and any proposed change of monitoring locations shall be identified and approved by the Executive Officer prior to their use. The Discharger shall conduct baseline sampling prior to HRC® injection and regular sampling with the required frequencies of the monitoring wells mentioned above for the following groundwater parameters:

<u>CONSTITUENT</u>	<u>UNITS</u> ¹	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u>
pH	pH units	grab	Weekly ² /Bi-monthly ³ /Quarterly ⁴
Temperature	°F	grab	Weekly ² /Bi-monthly ³ /Quarterly ⁴
Oxidation-reduction potential	millivolts	grab	Weekly ² /Bi-monthly ³ /Quarterly ⁴
Specific conductivity	µmhos/cm	grab	Weekly ² /Bi-monthly ³ /Quarterly ⁴
Ferrous iron	µg/L	grab	Weekly ² /Bi-monthly ³ /Quarterly ⁴
Dissolved Oxygen	µg/L	grab	Weekly ² /Bi-monthly ³ /Quarterly ⁴
Acetone	µg/L	grab	Bi-monthly ³ /Quarterly ⁴

¹ mg/L: milligrams per liter; µg/L: micrograms per liter; µmhos/cm: microohms per centimeter; °F: degree Fahrenheit

² The first two sampling events are required within fifteen days from the injection date. The constituents can be monitored using a field test instrument.

³ Bi-monthly sampling events are required after the first two sampling events for a period of six months.

⁴ Quarterly sampling events are required after the bi-monthly sampling events have been completed.

Tetrachloroethene	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Trichloroethene	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Cis-1,2-dichloroethene	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Trans-1,2-dichloroethene	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
1,1-dichloroethene	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
1,2-dichloroethane	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
1,1,1-trichloroethane	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Carbon tetrachloride	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
1,2,4-trimethylbenzene	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
1,1,1,2-trichloroethane	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Acetic acid	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Propionic acid	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Lactic acid	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Butyric acid	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Sulfide	µg/l	grab	Bi-monthly ³ /Quarterly ⁴
Total dissolved solids	mg/L	grab	Bi-monthly ³ /Quarterly ⁴
Sulfate	mg/l	grab	Bi-monthly ³ /Quarterly ⁴
Chloride	mg/L	grab	Bi-monthly ³ /Quarterly ⁴
Boron	mg/L	grab	Bi-monthly ³ /Quarterly ⁴
Manganese	m/L	grab	Bi-monthly ³ /Quarterly ⁴
Nitrate	mg/L	grab	Bi-monthly ³ /Quarterly ⁴
Carbon dioxide	mg/L	grab	Bi-monthly ³ /Quarterly ⁴
Total iron	µg/L	grab	Bi-monthly ³ /Quarterly ⁴
Priority pollutants ⁵	µg/L	grab	Two-time ⁶

⁵ A complete list of priority pollutants (Attachment A) is attached, but the Discharger is required to test only for volatile organic compounds (VOCs) on the priority pollutant list.

⁶ The first sampling event is required within the first year from the effective day of this permit and the second is required one year after the date of first sampling event.

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)"

Victory Investments Co., Inc.
Monitoring and Reporting Program No. CI-8606

File No. 03-085
Order No. R4-2002-0030

All records and reports submitted in compliance with this Order 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.

Ordered by:


Dennis A. Dickerson
Executive Officer

Date: October 24, 2003

PRIORITY POLLUTANTS**Metals**

Antimony
Arsenic
Beryllium
Cadmium
Chromium
Copper
Lead
Mercury
Nickel
Selenium
Silver
Thallium
Zinc

Miscellaneous

Cyanide
Asbestos (only if
specifically
required)

Pesticides & PCBs

Aldrin
Chlordane
Dieldrin
4,4'-DDT
4,4'-DDE
4,4'-DDD
Alpha-endosulfan
Beta-endosulfan
Endosulfan sulfate
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide
Alpha-BHC
Beta-BHC
Gamma-BHC
Delta-BHC
Toxaphene
PCB 1016
PCB 1221
PCB 1232
PCB 1242
PCB 1248
PCB 1254
PCB 1260

Base/Neutral Extractibles

Acenaphthene
Benzidine
1,2,4-trichlorobenzene
Hexachlorobenzene
Hexachloroethane
Bis(2-chloroethyl) ether
2-chloronaphthalene
1,2-dichlorobenzene
1,3-dichlorobenzene
1,4-dichlorobenzene
3,3'-dichlorobenzidine
2,4-dinitrotoluene
2,6-dinitrotoluene
1,2-diphenylhydrazine
Fluoranthene
4-chlorophenyl phenyl ether
4-bromophenyl phenyl ether
Bis(2-chloroisopropyl) ether
Bis(2-chloroethoxy) methane
Hexachlorobutadiene
Hexachlorocyclopentadiene
Isophorone
Naphthalene
Nitrobenzene
N-nitrosodimethylamine
N-nitrosodi-n-propylamine
N-nitrosodiphenylamine
Bis (2-ethylhexyl) phthalate
Butyl benzyl phthalate
Di-n-butyl phthalate
Di-n-octyl phthalate
Diethyl phthalate
Dimethyl phthalate
Benzo(a) anthracene
Benzo(a) pyrene
Benzo(b) fluoranthene
Benzo(k) fluoranthene
Chrysene
Acenaphthylene
Anthracene
1,12-benzoperylene
Fluorene
Phenanthrene
1,2,5,6-dibenzanthracene
Indeno (1,2,3-cd) pyrene
Pyrene
TCDD

Acid Extractibles

2,4,6-trichlorophenol
P-chloro-m-cresol
2-chlorophenol
2,4-dichlorophenol
2,4-dimethylphenol
2-nitrophenol
4-nitrophenol
2,4-dinitrophenol
4,6-dinitro-o-cresol
Pentachlorophenol
Phenol

Volatile Organics

Acrolein
Acrylonitrile
Benzene
Carbon tetrachloride
Chlorobenzene
1,2-dichloroethane
1,1,1-trichloroethane
1,1-dichloroethane
1,1,2-trichloroethane
1,1,2,2-tetrachloroethane
Chloroethane
Chloroform
1,1-dichloroethylene
1,2-trans-dichloroethylene
1,2-dichloropropane
1,3-dichloropropylene
Ethylbenzene
Methylene chloride
Methyl chloride
Methyl bromide
Bromoform
Dichlorobromomethane
Chlorodibromomethane
Tetrachloroethylene
Toluene
Trichloroethylene
Vinyl chloride
2-chloroethyl vinyl ether
Xylene