



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

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

Arnold Schwarzenegger  
Governor

March 27, 2009

Ms. Flora Khodadadi  
818 S. Shenandoah Street  
Los Angeles, CA 90035

**AMENDMENT OF GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES (ORDER NO. R4-2007-0019, SERIES NO. 003, CI NO. 9226)  
E&F ARCO (PRIORITY B-2 SITE)  
15922 INGLEWOOD AVENUE, LAWDALE, CALIFORNIA (UST CASE NO. I-16072)**

Dear Ms. Khodadadi:

As a brief background, on March 19, 2007, the Executive Officer of this Regional Board issued a General Waste Discharge Requirements (WDR) Order No. R4-2007-0019-003 to the responsible party (RP, or hereafter Discharger) to allow the discharge of Fenton's Reagent to remediate the groundwater contamination beneath the Site. From September 2007 through September 2008, a total of 2,004 gallons of Fenton's Reagent were injected into the groundwater beneath the site.

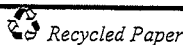
According to the "Workplan for Further Groundwater Remediation" (RAP) dated February 19, 2009, submitted by your consultant, EnviroMonitoring Services (EMS), injection of Fenton's Reagent between 2007 and 2008 did not have a substantial effect in reducing the concentrations of fuel constituents in groundwater. To further remediate the groundwater at the site, EMS in the RAP proposed to inject ozone, instead of the Fenton's Reagent, into the groundwater beneath the site. According to EMS, ozone injection is expected to be more efficient in reducing the contaminant concentrations for the following reasons:

- Ozone is a more potent oxidizing chemical.
- Ozone will be injected into the subsurface continuously as opposed to Fenton's Reagent which was added in separate events.
- Ozone will be injected under pressure which prevents unwanted reactions of the chemical with carbonates/bicarbonates in the formation.

Two additional injection wells (IW-4 and IW-5) will be installed near the existing USTs and dispenser islands for the proposed ozone injection. Each injection well contains an 18-inch sparge tip set from 28.5 to 30.0 feet bgs (approximately six feet below water table, within the sandy soil layer).

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.

*California Environmental Protection Agency*



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

Ms. Khodadadi  
15922 Inglewood Ave., Lawndale

- 2 -

March 27, 2009

Enclosed is your Waste Discharge Requirements, consisting of General WDRs Order No. 2007-0019 and Monitoring and Reporting Program No. CI-9226 and Standard Provisions. This Waste Discharge Requirements shall not be terminated without the regulatory oversight agency's prior approval.

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-9226, which will ensure 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.

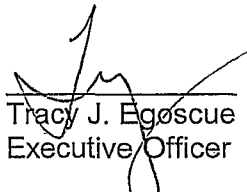
To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general permit in a separate letter, when your project has been completed and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 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 it is available on line at:

[http://www.waterboards.ca.gov/losangeles/board\\_decisions/adopted\\_orders/general\\_orders/r4-2007-0019/r4-2007-0019.pdf](http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf)

If you have any questions, please call Dr. Rebecca Chou at (213) 620-6156 for WDRs administrative matters or Mr. Arman Toumari at (213) 576-6708 for technical matters.

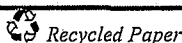
Sincerely,



Tracy J. Egoscue  
Executive Officer

cc: Hari Patel, SWRCB, Underground Storage Tank Cleanup Fund  
Nancy Matsumoto, Water Replenishment District of Southern California  
Tim Smith, Los Angeles County Department of Public Works  
S. Javad Masoudi, EnviroMonitoring Services

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