



California Regional Water Quality Control Board

Los Angeles Region



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

February 26, 2010

Mr. Hezghia Es-haghian
Channel Islands Properties, LLC
P.O. Box 260500
Encino, CA 91426

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)

Dear Mr. Es-haghian:

We have received your letter dated January 21, 2010, prepared by your consultant, Applied Environmental Technologies Inc. (AET), for coverage under the General Waste Discharge Requirements (WDRs) to implement a full-scale groundwater remediation project injecting Fenton's Reagent at the site referenced above in Oxnard, California.

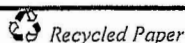
Since April 1988, various subsurface investigations and remediation activities have been conducted at the subject site subsequent to the tank removal and replacement, which consisted of drilling and sampling numeral soil borings, installing nineteen groundwater monitoring wells (seven wells have since 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 Fenton's Reagent injection is proposed.

Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019 and Monitoring and Reporting Program No. CI-9236, were issued on April 3, 2007, for a pilot testing using Fenton's Reagent at the subject site, via seven injection wells IW-1 through IW-7.

In the "Workplan for Additional Fenton's Reagent Injection" dated May 27, 2009, from AET, you proposed to add five additional wells, IW-9 through IW-11 & IW-14R, for injecting Fenton's Reagent. The Workplan was approved by the Ventura County Environmental Health Department on September 8, 2009. We have reviewed your letter and workplan and concur with the proposed addition of 5 injection wells around the center of the groundwater plumes.

California Environmental Protection Agency



Enclosed is your Revised Monitoring and Reporting Program No. CI-9236. The Revised 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.

If you have any questions, please contact Dr. Rebecca Chou at (213) 620-6156 for WDRs administration matters, or Mr. Gregg Kwey at (213) 576-6702 for technical matters.

Sincerely,



Tracy J. Egoscue
Executive Officer

~~Enclosure: Revised 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
REVISED MONITORING AND REPORTING PROGRAM NO. CI-9236
FOR
AMERICAN GAS
877 SOUTH VENTURA BOULEVARD, OXNARD
(FENTON'S REAGENT INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 005)

I. REPORTING REQUIREMENTS

- A. Channel Islands Properties, LLC (hereinafter Discharger) shall implement this revised monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for January to June 2010, shall be received at the Regional Board by July 15, 2010. 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

- 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.
- 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. FENTON'S REAGENT INJECTION MONITORING REQUIREMENTS

The Semi-Annually reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the Fenton's Reagent. 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 twelve injection points, IW-1 through IW-11 & IW-14R (see attached Plate 2), are proposed. Additional injection points should be reviewed and approved by the County of Ventura, Environmental Health Division (VCEHD) and Regional Board prior to implementations.
2. Written and tabular summary defining the quantity of Fenton's Reagent injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from one up-gradient groundwater monitoring well MW-5, two source area wells MW-13 and MW-14 and two down-gradient wells MW-12 and MW-17 on a semi-annual basis to monitor the effectiveness of the in-situ groundwater remediation. Fenton's Reagent 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	• Semi-Annually ¹
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-Annually ¹
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Semi-Annually ¹
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually ¹

Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually ¹
Oxidation-reduction potential	miliivolts		• Semi-Annually ¹
Dissolved Oxygen	µg/L	Grab	• Semi-Annually ¹
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually ¹
Total Chromium and chromium six ²	µg/L	Grab	• Semi-Annually ¹
PH	pH units	Grab	• Semi-Annually ¹
Temperature	⁰ F/ ⁰ C	Grab	• Semi-Annually ¹
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually ¹

¹ One week before injection and Semi-Annually thereafter

² The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth Semi-Annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored Semi-Annually thereafter.

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.

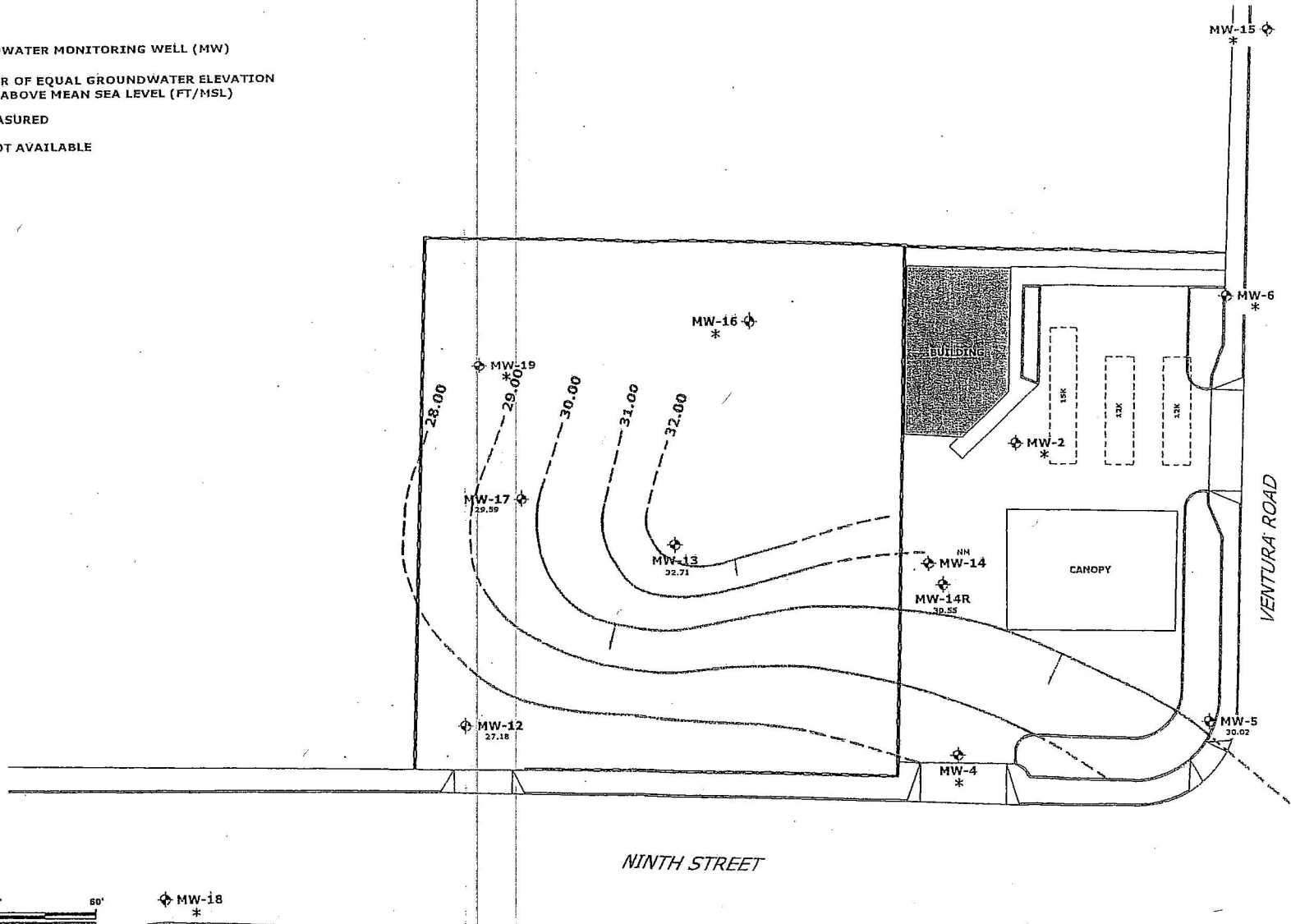
Ordered by:



Tracy J. Egoscue
Executive Officer

Date: February 26, 2010

- LEGEND**
- ◆ GROUNDWATER MONITORING WELL (MW)
 - CONTOUR OF EQUAL GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (FT/MSL)
 - NM NOT MEASURED
 - * DATA NOT AVAILABLE



◆ MW-18
*

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

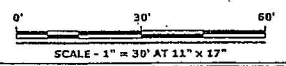
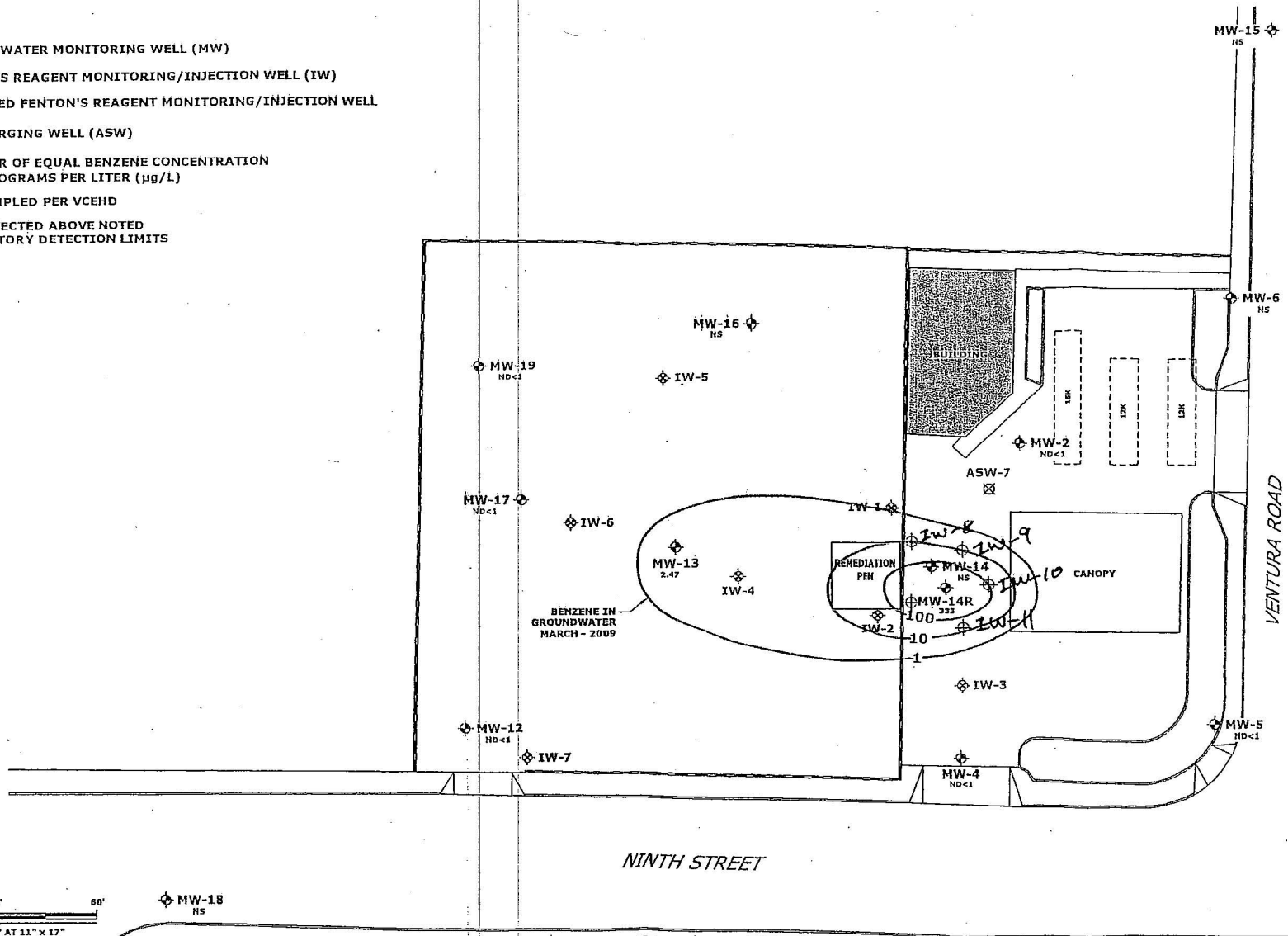
GROUNDWATER ELEVATION CONTOUR MAP
 MARCH - 2009
 877 SOUTH VENTURA ROAD
 OXNARD, CALIFORNIA
 MAY 12, 2009

PLATE REFERENCE 1520-01_Q3

PROJECT NUMBER 1520-01

PLATE
10

- LEGEND**
- ◆ GROUNDWATER MONITORING WELL (MW)
 - ◆ FENTON'S REAGENT MONITORING/INJECTION WELL (IW)
 - ◆ PROPOSED FENTON'S REAGENT MONITORING/INJECTION WELL
 - ⊠ AIR SPARGING WELL (ASW)
 - CONTOUR OF EQUAL BENZENE CONCENTRATION IN MICROGRAMS PER LITER (µg/L)
 - NS NOT SAMPLED PER VCEHD
 - ND NOT DETECTED ABOVE NOTED LABORATORY DETECTION LIMITS



◆ MW-18
NS

**SITE PLAN SHOWING PROPOSED ADDITIONAL
FENTON'S REAGENT INJECTION WELLS**
877 SOUTH VENTURA ROAD
OXNARD, CALIFORNIA

**PLATE
14**

Applied Environmental Technologies, Inc.
4561 Market Street, Suite B • Ventura, California 93003
Phone (805)650-1400 Fax (805)650-1574

PLATE REFERENCE 1520-01_Q14

MAY 28, 2009

PROJECT NUMBER 1520-01