



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

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Arnold Schwarzenegger
Governor

November 21, 2008

Mr. Chris Panaitescu
Thrifty Oil Co.
13116 Imperial Highway
Santa Fe Springs, CA 90670

**UNDERGROUND TANKS PROGRAM – REVISION OF WASTE DISCHARGE REQUIREMENTS
FROM PILOT TEST TO FULL SCALE OZONE SPARGE SYSTEM
(ORDER # R4-2007-0019, CI # CI-9280)
THRIFTY STATION # 003
2330 E. 7TH STREET, LONG BEACH (FILE # 908040098) (D1)**

Dear Mr. Panaitescu:

Pursuant to Health and Safety Code section 25296.10, you are required to take corrective action (i.e. Preliminary Site Assessment, Soil and Water Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety, and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), title 23, sections 2720 through 2727.

Site Assessment and/or Corrective Action Update

In February 1988, three steel 10,000-gallon USTs were removed and replaced with three 10,000-gallon fiberglass USTs. A total of 636 tons of impacted soil were excavated and disposed of off-site. Prior to and subsequent to the tank replacement, seven groundwater monitoring wells and ten soil borings were installed to characterize soil and groundwater beneath the site. The investigations indicated that the impacted groundwater was mostly concentrated within the property. Historically, TPH, benzene, and MTBE were detected up to 16,220, 127, and 12 mg/kg, respectively, in soil; and up to 2,640,000, 41,200, and 39,000 µg/L, respectively, in groundwater.

In addition to the excavation of 636 tons of the petroleum-impacted soil, the site was remediated with a vapor extraction/air sparge system from December 2002 to May 2005. After 16,087 hours of operation and recovered 33,932 lbs of hydrocarbons as vapor, the system was shut down as the influent vapor reached asymptotic concentrations. Confirmation soil borings confirmed the result and on September 1, 2006, a request for no further action for soil assessment and remediation was granted.

Groundwater monitoring indicated that dissolved phase petroleum hydrocarbons in the groundwater beneath the site are at significantly high concentrations. Since February 2004, over-purging was initiated as an interim remedial action to reduce the concentrations of hydrocarbons and MTBE in groundwater. Overpurging was conducted on a weekly basis and will continue until a permanent remedial measure is started up.

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During August-October 2007, a pilot study was conducted to evaluate the effectiveness of the ozone sparge technology. The test indicated a positive result. A full-scale ozone sparge system with 5 additional ozone sparge points was therefore proposed to remediate the impacted groundwater beneath the site. The Regional Board approved the work plan "Remedial Action Plan for Ozone Sparge System" dated June 11, 2008, on July 10, 2008.

Ozone Sparge – Waste Discharge Requirements (CCR, Section 2726)

As part of the implementation of the approved "Remedial Action Plan for Ozone Sparge System", by a letter dated August 12, 2008, you submitted an application for modification of waste discharge requirements (Order # R4-2007-0019, CI # 9280). The modification is to allow up to 3 lbs/day of ozone injected through 10 injection points as proposed in the remedial action plan.

We have reviewed the "Application/Report of Waste Discharge" dated August 20, 2008, prepared by your consultant, Environ Strategy Consultants, Inc. (ESCI), for the subject site. Following is our comments:

General waste discharge requirements were issued for the site on June 25, 2007. The requirements were for injection of ozone into groundwater through 5 injection points during a pilot study from August to October 2007. Except for an addition of 5 injection points to cope with a higher ozone injection rate (up to 3 lbs/day), other conditions such as groundwater monitoring well network and sampling program remained unchanged.

We determined that general waste discharge requirements issued for the ozone sparge pilot study on June 25, 2007, are applicable for the full scale ozone sparge system as proposed. You are required to comply with all terms and conditions set forth in:

1. The Regional Board's Order No. R4-2007-0019, "General Waste Discharge Requirements for Groundwater remediation at Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Volatile Organic Compound Impacted Sites" and Monitoring and Reporting Program No. CI-9280 issued to the subject site on June 25, 2007.
2. The Regional Board's July 10, 2008, letter which approved the June 11, 2008, work plan "Remedial Action Plan for Ozone-Sparge System".

Failure to submit the required technical reports, by the specified due dates, may result in an appropriate enforcement action by this Regional Board.

Please note that effective on August 15, 2007, Los Angeles Regional Water Quality Control Board Underground Storage Tank Program no longer requires hard copy reports. Please refer the attached guidance for submittal of the electronic reports. The guidance is also available at http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/e-gmr_guideline.pdf


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If you have any questions concerning this matter, please contact Harry Nguyen at (213) 576-6658 or hnguyen@waterboards.ca.gov. Please always update the Regional Board with the names, addresses, telephone numbers, and e-mail addresses of the contact persons for the responsible party as well as the consultant for the site.

Sincerely,



Tracy J. Egoscue
Executive Officer

cc: Ms. Yvonne Shanks, SWRCB, Underground Storage Tank Cleanup Fund
Mr. Jeff Bennedict, City of Long Beach, Department of Health and Human Services
Ms. Nancy Matsumoto, Water Replenishment District of Southern California
Mr. Dane Nygaard, Environ Strategy Consultants, Inc.
Ms. Rebecca Chow, Los Angeles Regional Water Quality Control Board