



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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

July 10, 2007

Mr. Gad K. Emein and Mr. Saied Aminpour
Ventura Shoup Car Wash, Inc.
22517 Ventura Boulevard
Woodland Hills, CA 91364

**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)
VENTURA WEST CAR WASH, 22517 VENTURA BOULEVARD, WOODLAND HILLS,
CALIFORNIA (CI-9282, SERIES NO. 020); (UST FILE NO. 913640498)**

Dear Mr. Emein and Mr. Aminpour:

We have completed our review of your application for coverage under General Waste Discharge Requirements to inject oxidizing/colloid agents into groundwater at the subject site (the Site). The purpose of the oxidizing/colloid agents injection is to mitigate fuel constituents present in the groundwater beneath the Site in order to minimize the threat to the underlying aquifers.

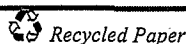
The Site is located within the southwestern portion of the San Fernando Basin and is at an elevation of approximately 875 feet above mean sea level. The local topography slopes to the northwest. The Site is underlain by sand, silt and clay to a depth of approximately 25 feet below ground surface (bgs).

Currently, there are 24 groundwater monitoring wells (seven onsite and seventeen offsite) related to the site. Quarterly monitoring has been conducted at the Site since June 1999. Historically, up to 260,000 µg/L of TPHg, 18,000 µg/L of benzene and 1,300 µg/L of MTBE were detected in the groundwater beneath the Site. In March 2007, up to 14,000 µg/L of TPHg, 600 µg/L of benzene and 26 µg/L of MTBE were detected in the groundwater. Historically, up to 20 feet of free product were detected in well MW-3. Free product was not detected in any monitoring wells related to the Site in March 2007. Depth to groundwater was measured at about 18 feet bgs and the groundwater flow direction was toward the northwest.

Since May 2005, a soil vapor extraction and air sparging (SVE/AS) system has been operated at the Site. In addition, several episodes of high vacuum dual phase extraction (HVDPE) have been conducted at the Site using a mobile HVDPE unit.

In an amended remedial action plan (RAP) dated October 27, 2006, your consultant, Soil Pacific, Inc. (SPI), proposed to inject oxygen release material (ORM) into the groundwater to mitigate the residual groundwater contamination plume. On February 15, 2007, Regional Board staff approved the amended RAP. In a letter dated July 5, 2007, SPI indicated that the

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.

Mr. Gad K. Emein
Mr. Saied Aminpour
Ventura Shoup Car Wash, Inc.

- 2 -

July 10, 2007

proposed ORM is a solution consists of 95-parts 15% hydrogen peroxide and 5-parts Super C colloidal agent.

Approximately 200 injection points will be installed and concentrated within the delineated groundwater plume. These injection points will be lined up in four rows, two along the Clarendon Street approximately between MW-12 and MW-10, and the other two along the alley bordering the northern edge of the Site approximately between MW-4 and MW-9, respectively. On February 15, 2007, Regional Board staff approved the amended RAP.

Based on our review, 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*" adopted by the Regional Board on March 1, 2007.

Enclosed are your Waste Discharge Requirements, consisting of Regional Board Order No. R4-2007-0019, Monitoring and Reporting Program No. CI-9264, and Standard Provisions.

The WDRs issued shall not be rescinded until Regional Board staff determine the WRDs are no-longer needed for the site cleanup.

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, please reference Compliance File No. CI-9264 to assure that the reports are directed to the appropriate staff. Do not combine other reports with your monitoring reports complying with Order No. R4-2007-0019. Submit each type of report as a separate document.

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. A copy of the Order can also be found online at: http://www.waterboards.ca.gov/losangeles/html/permits/gen_orders/R4-2007-0019/R4-2007-0019.pdf


If you have any questions, please contact Mr. Rodney Nelson at (213) 620-6119. Questions regarding the underground storage tank issues should be forwarded to Ms. Chandra Cansler at (213) 576-6701.

Sincerely,



Deborah J. Smith
Interim Executive Officer

California Environmental Protection Agency

 Recycled Paper.

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

Mr. Gad K. Emein
Mr. Saied Aminpour
Ventura Shoup Car Wash, Inc.


- 3 -

July 10, 2007

Enclosures: 1. Board Order No. R4-2007-0019
2. Monitoring and Reporting Program No. CI-9264
3. Standard Provisions

Cc: Julia Erickson, State Water Resources Control Board, UST Cleanup Fund
Captain Frank Comfort, Los Angeles City Fire Department, Underground Tanks
Valerie Toney, Los Angeles City Fire Department, Underground Tanks
Khajehbagli Khojasteh (Alias: Kay Bagli), offsite property owner, 5224 Woodlake
Avenue, Woodland Hills, CA 91367
Yones Kabir, Soil Pacific, Inc.
Sohila Rezai, Attorney at Law
Dan Hoffman, Attorney at Law

California Environmental Protection Agency

 Recycled Paper

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

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9282
FOR
VENTURA WEST CAR WASH
ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2007-0019
SERIES NO. 020

I. REPORTING REQUIREMENTS

- A. Ventura West Car Wash (hereinafter Discharger) shall implement this monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2007-0019.

Monitoring reports shall be received by the due 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

The first monitoring report under this monitoring program is due by October 15, 2007.

- 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 January 30 of each year, beginning January 30, 2008, 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 (WDR).
- 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 the WDR. 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. In addition to the aforementioned requirements, the Discharger shall comply with requirements contained in Section G of Order No. R4-2007-0019 "Monitoring and Reporting Requirements".

II. DISCHARGE MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding the injection activities. If there is no injection during any reporting period, the report shall so state:

1. Location map showing injection points.
2. Written summary defining:
 - Depth of injection points;
 - Quantity of the oxygen release material (ORM) injected at each injection point; and
 - Total amount of the ORM injected at the site.
3. Monthly visual inspection at each injection well shall be conducted to evaluate the well casing integrity for a period of three months after each injection. The quarterly report shall include a summary of the visual inspection.
4. To avoid groundwater monitoring network reduction, data bias, and well screen clogging or alteration, no groundwater monitoring wells shall be used as injection points during the proposed ORM injection. Separate injection points/wells must be installed at the Site for the proposed ORM injection.

III. GROUNDWATER MONITORING PROGRAM

A groundwater-monitoring program shall be designed to detect and evaluate impacts associated with the injection activities. The monitoring well network must include MW-13 and MW-19 as background wells; MW-5, MW-9, and MW-11 as source wells; and MW-16, MW-17, and MW-23 as downgradient wells. These sampling stations shall not be changed and any proposed change of monitoring locations shall be identified and approved by the Regional Board Executive Officer (Executive Officer) prior to their use. The Discharger shall conduct baseline sampling from the downgradient wells (MW-16, MW-17, and MW-23) one or two weeks prior to the proposed ORM injection and regular sampling with the required frequencies from all the monitoring wells in the monitoring network for the following constituents:

<u>CONSTITUENT</u>	<u>UNITS¹</u>	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u>
pH ⁴	PH units	Grab	Monthly ² /Quarterly ³
Temperature ⁴	⁰ F	grab	Monthly ² /Quarterly ³
Oxidation-reduction potential ⁴	Milivolts	grab	Monthly ² /Quarterly ³

Specific conductivity ⁴	µmhos/cm	grab	Monthly ² /Quarterly ³
Ferrous iron	µg/L	grab	Monthly ² /Quarterly ³
Dissolved Oxygen ⁴	µg/L	grab	Monthly ² /Quarterly ³
MTBE	µg/L	grab	Monthly ² /Quarterly ³
Tert-Butyl Alcohol (TBA)	µg/L	grab	Monthly ² /Quarterly ³
Di-isopropyl Ether (DIPE)	µg/L	grab	Monthly ² /Quarterly ³
Ethyl-t-Butyl Ether (ETBE)	µg/L	grab	Monthly ² /Quarterly ³
Tert-Amyl-Methyl Ether (TAME)	µg/L	grab	Monthly ² /Quarterly ³
Acetone	µg/L	grab	Monthly ² /Quarterly ³
Formaldehyde	µg/L	grab	Monthly ² /Quarterly ³
Total Petroleum Hydrocarbons as gasoline (TPHg)	µg/L	grab	Monthly ² /Quarterly ³
Carbon tetrachloride	µg/L	grab	Monthly ² /Quarterly ³
Benzene	µg/L	grab	Monthly ² /Quarterly ³
Ethylbenzene	µg/L	grab	Monthly ² /Quarterly ³
Toluene	µg/L	grab	Monthly ² /Quarterly ³
Total xylenes	µg/L	grab	Monthly ² /Quarterly ³
Methane	µg/L	grab	Monthly ² /Quarterly ³
Total organic carbon	µg/L	grab	Monthly ² /Quarterly ³
Total dissolved solids	mg/L	grab	Quarterly ³
Sulfate	mg/l	grab	Quarterly ³
Chloride	mg/L	grab	Quarterly ³
Boron	mg/L	grab	Quarterly ³
Carbon dioxide	mg/L	grab	Quarterly ³
Manganese	µg/L	grab	Quarterly ³
Total iron	µg/L	grab	Quarterly ³
Alkalinity	µg/L	grab	Quarterly ³
Chromium (VI)	mg/L	grab	Quarterly ⁵
Total Chromium	mg/L	grab	Quarterly ⁵

- ¹ mg/L: milligrams per liter; µg/L: micrograms per liter; µmhos/cm: microohms per centimeter; °F: degree Fahrenheit.
- ² Monthly sampling events are required for the first month after the injection date
- ³ Quarterly sampling events are required after the first month.
- ⁴ Field instrument will be used to test for this constituent.
- ⁵ One time sampling event is required for this constituent. If detected, quarterly monitoring is required from the same monitoring wells.

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

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)"

Ventura West Car Wash
Monitoring and Reporting Program No. CI-9282

UST File No. 913640498
Order No. R4-2007-0019

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:



Deborah J. Smith
Interim Executive Officer

Date: July 10, 2007