



California Regional Water Quality Control Board

Los Angeles Region

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



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

September 30, 2009

Mr. Stanley Ofstein
5646 Lexington Avenue
Los Angeles, CA 90038-2206

General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel, and/or Volatile Organic Compound, and/or Hexavalent Chromium Impacted Sites (Order No. R4-2007-0019) - Ammonia Injection Former Gas-to-Go Facility, at 1353 Western Avenue North, Los Angeles, California UST File No. 900270243, Priority B-D (Series No. 105, CI-9547)

Dear Mr. Ofstein:

We have completed our review of your application for coverage under the General Waste Discharge Requirements (WDR) for the injection of ammonia at the site referenced above for groundwater remediation in Los Angeles, which we received on July 22, 2009.

You (hereinafter referred to as "Discharger") are conducting groundwater cleanup activities at the Former Gas-to-Go facility (Site) located at 1353 Western Avenue North, Los Angeles, California. The Site formerly contained a gasoline fueling station with two 12,000-gallon gasoline underground storage tanks (USTs) and three vertical 12,000-gallon gasoline USTs. The Site currently contains a thrift store and a large canopy covering three fueling islands. Surrounding property includes the Covenant House California for housing homeless youths adjacent to the south, residential properties on both sides of the 101 freeway, a U.S. post office to the north, and other commercial properties in the vicinity.

Site investigations in 1999 and from 2003 to 2007 indicated that the maximum concentrations of total petroleum hydrocarbons as gasoline (TPH_G), TPH as diesel (TPH_D), total recoverable petroleum hydrocarbons (TRPH), benzene, methyl tertiary butyl ether (MTBE), and tertiary butyl alcohol (TBA) were 6,820 milligrams per kilogram (mg/kg) (TPH_G), 4,500 mg/kg (TPH_D), 200,000 mg/kg (TRPH), 254 mg/kg (benzene), 0.145 mg/kg (MTBE), and 81.3 mg/kg (TBA), respectively. Groundwater monitoring from 2004 to 2009 indicated that groundwater has been contaminated with petroleum hydrocarbons, MTBE, and TBA. Historical maximum groundwater concentrations for TPH_G, TPH_D, benzene, MTBE, and TBA have been 168,000 micrograms per liter (µg/L) (TPH_G), 27,300 µg/L (TPH_D), 48,400 µg/L (benzene), 4,800 µg/L (MTBE), and 215,000 µg/L (TBA), respectively. Groundwater contamination has extended offsite to the southwest. Based on the most recent groundwater data from June 2009, TPH_G, TPH_D, benzene, MTBE, and TBA were detected at maximum concentrations of 81,000 µg/L (TPH_G), 5,700 µg/L (TPH_D), 25,900 µg/L (benzene), 2,490 µg/L (MTBE), and 59,600 µg/L (TBA), respectively.

The site is located within the Hollywood Groundwater Sub-Basin of the Coastal Plain Basin. Soil beneath the site generally consists of clay, with some sand, silt, and gravel. The depth to groundwater is approximately 35 feet below ground surface (bgs) and flows toward the north in

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the upper groundwater zone (northern half of site), while the depth to groundwater in the lower zone is approximately 45 feet bgs and flows to the south-southwest. The closest production well (01S13W04P02S) is located over 17,000 feet from the Site.

In-situ groundwater bioremediation using electrolysis to generate dissolved oxygen (DO) to promote degradation of contaminants by bacteria has occurred since May 2008.

On July 22, 2009, Environmental Consulting & Construction Corp. (ECC) submitted a WDR Permit Application on behalf of the Discharger to conduct cleanup of petroleum hydrocarbons in groundwater at the subject site using ammonia injection as a nitrogen nutrient addition to support in-situ biodegradation. Ammonia mixed with water will be injected into several remediation wells. A Remedial Action Plan (RAP) was submitted on May 15, 2009, and the Regional Board approved the RAP on July 14, 2009.

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.

Regional Board staff have 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 this Regional Board on March 1, 2007.

Enclosed are your Waste Discharge Requirements, consisting of Regional Board Order No. R4-2007-0019 (Series No. 105), Monitoring and Reporting Program No. CI-9547, and Standard Provisions. The WDRs issued shall not be terminated without the regulatory oversight agency's approval.

You are required to utilize remediation wells as injection points dedicated to the introduction of the ammonia in order to meet the conditions specified in Order No. R-4-2007-0019 for the proposed project. The existing monitoring wells shall not be used as injection points.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment (September 30, 2009) 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-9547, 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.

To avoid paying future annual fees, please submit written request for termination of your enrollment under the general permit in a separate letter when your remediation work 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.

Mr. Stanley Ofstein
1353 Western Ave. N.

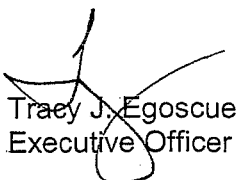
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We are sending a copy of Order No. R4-2007-0019 only to the applicant. A copy of the Order will be furnished to anyone who requests it. A copy of the order can also be found online at http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf.

If you have any questions, please contact Dr. Rebecca Chou at (213) 620-6156 for WDR administration matters, or Mr. Dave Bjostad at (213) 576-6713 or dbjostad@waterboards.ca.gov for technical matters.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosures: 1. Monitoring and Reporting Program No. CI-9547
2. Board Order No. R4-2007-0019
3. Standard Provisions

cc: Ms. Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank Cleanup Fund
Ms. Nancy Mastumoto, Water Replenishment District of Southern California
Captain Matthew Gatewood, Los Angeles City Fire Department, Underground Storage Tanks
Mr. Eloy Luna, Los Angeles City Fire Department, Underground Storage Tanks
Mr. Scott Fagan, Environmental Consulting & Construction Corp.

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