

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI-9547

for

MR. STANLEY OFSTEIN
FORMER GAS-TO-GO
1353 WESTERN AVENUE NORTH, LOS ANGELES

(AMMONIA INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019 SERIES NO. 105)

I. REPORTING REQUIREMENTS

- A. Mr. Stanley Ofstein (hereinafter Discharger) shall implement this monitoring program on the effective date (September 30, 2009) under Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for October through December 2009, is due by **January 15, 2010**. Subsequent monitoring reports are due according to the following schedule:

<u>Reporting Period</u>	<u>Report Due</u>
January – June	July 15
July – December	January 15

If there is no discharge or injection during any reporting period, the report shall state so. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

- B. By March 1st of each year, beginning **March 1, 2010**, 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).
- C. 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.
- D. The method limits (MLs) for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular limit is not attainable and obtains approval for a higher reporting limit 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 from the Regional Board.

- E. 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.
- F. 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.
- G. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" that 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.
- H. 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.
- I. 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.
- J. 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.
- K. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving the Executive Officer's written approval.

II. AMMONIA INJECTION MONITORING REQUIREMENTS

The semi-annual monitoring reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the ammonia injection.

2. Written and tabular summary defining the quantity of ammonia injected per month to the groundwater and a summary describing the days on which the injection system was in operation.
3. Bi-annual visual inspection at each injection well shall be conducted to evaluate the well casing integrity. The monitoring 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 ammonia injection. Separate sparge points/wells must be used for the injection.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from source area wells MW-1, MW-2, MW-8, and MW-26; cross-gradient wells MW-5 and MW-6; and down-gradient well MW-15 to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Figures 1 through 4). The existing monitoring wells shall not be used as injection points and ammonia 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 (TPH _G) and as diesel (TPH _D)	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), Ethyl tertiary butyl 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, and Nitrogen as nitrate, nitrite, and ammonia	mg/L	Grab	Semi-annually ¹

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Oxidation-reduction potential	millivolts		Semi-annually ¹
Dissolved Oxygen	mg/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
cis-1,2-Dichloroethene (c-1,2-DCE) trans-1,2-Dichloroethene (t-1,2-DCE) cis-1,3-Dichloropropene Carbon tetrachloride Chlorobenzene Methylene chloride (Dichloromethane) Chloroethane 1,1,2,2-Tetrachloroethane Chloroform 1,1,1,2-Tetrachloroethane Chloromethane Tetrachloroethene (PCE) 1,1,1-Trichloroethane (1,1,1-TCA) 1,2-Dichlorobenzene 1,1,2-Trichloroethane (1,1,2-TCA) 1,3-Dichlorobenzene Trichloroethene (TCE) 1,4-Dichlorobenzene 1,1-Dichloroethane (1,1-DCA) 1,2-Dichloroethane (1,2-DCA) Vinyl chloride (VC) 1,1-Dichloroethylene (1,1-DCE)	µg/L	Grab	Semi-annually ³
¹ The first sampling event must be conducted one week before ammonia injection, then semi-annually thereafter. ² The Discharger is required to monitor for total chromium and chromium six during the baseline, second, and fourth semi-annual monitoring events. If detected during any of these sampling events, then total chromium and chromium six must be monitored semi-annually thereafter. ³ The Discharger is required to monitor for these compounds only if they are detected in the first sampling event.			

All groundwater monitoring reports must include, at minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Semi-annual 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 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)"

VI. PUBLIC DOCUMENTS

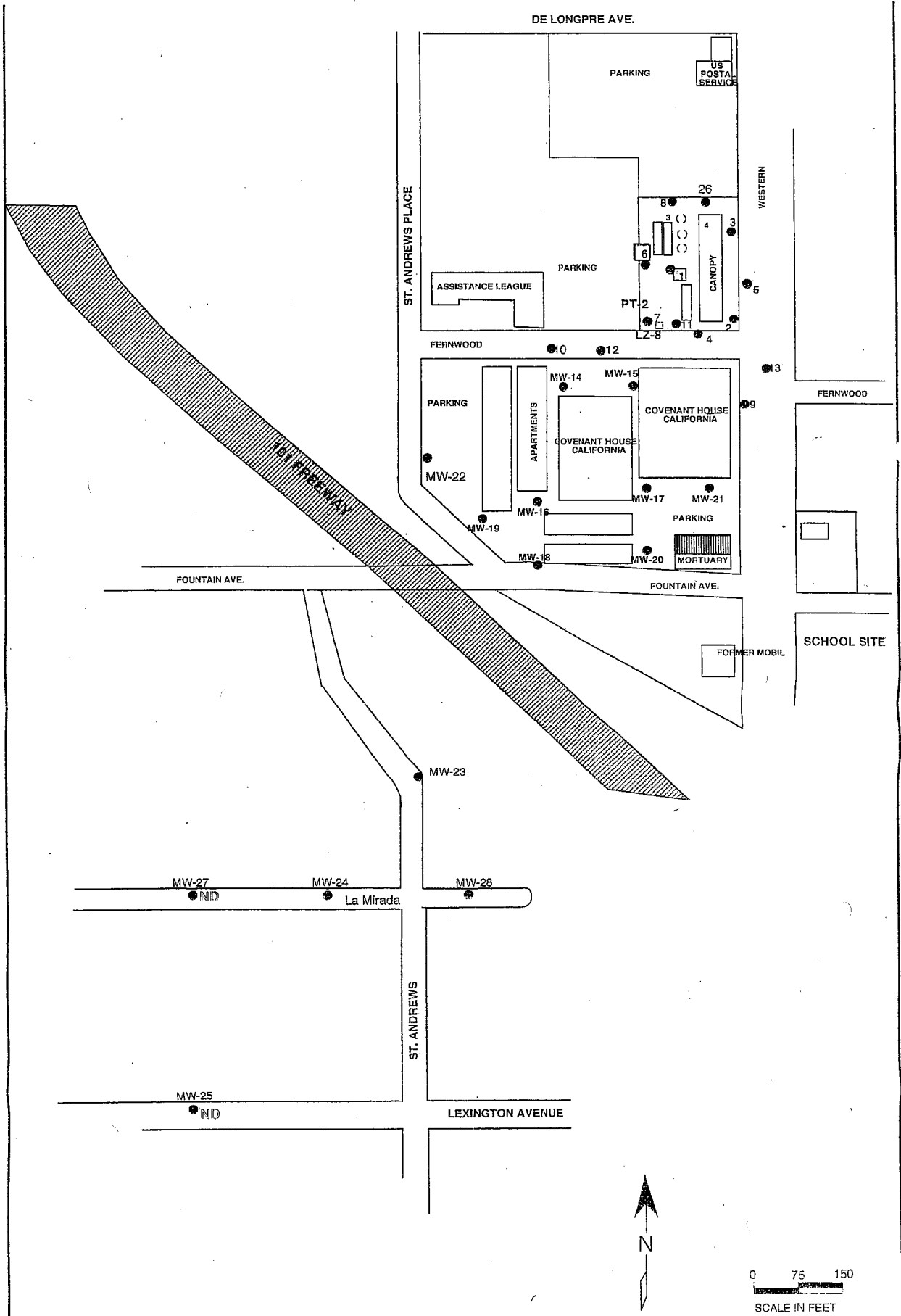
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:



Tracy J. Egoscue
Executive Officer

Date: September 30, 2009



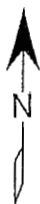
**ENVIRONMENTAL
CONSULTING &
CONSTRUCTION, INC.**

Site Plot Plan
1353 N Western Ave.
Los Angeles, California

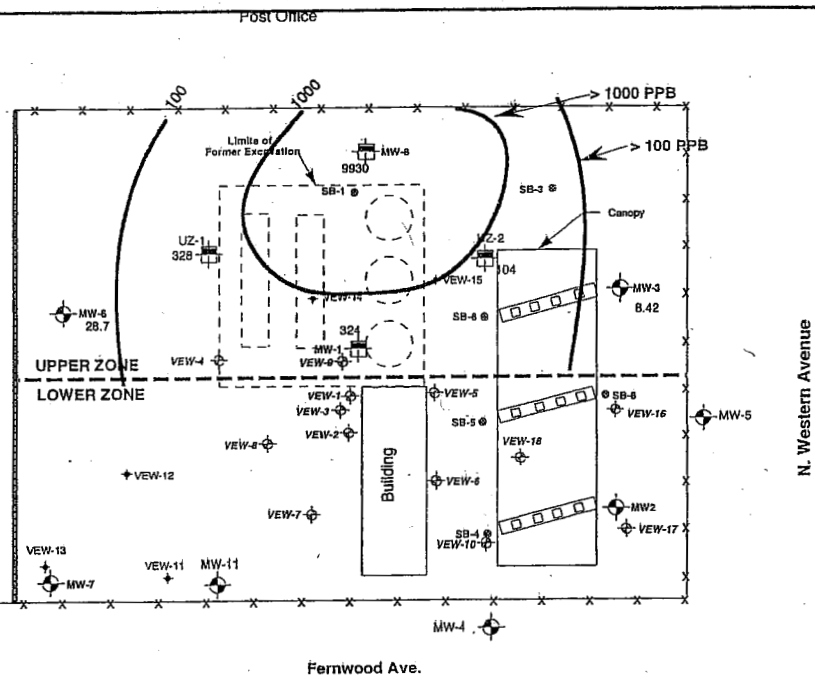
Project Number	Date	PM	Figure
----------------	------	----	--------

LEGEND

- Soil Boring Location
- ⊕ Groundwater Monitoring Well Location
- ⊕ Vapor Extraction Well
- ⊕ Remediation Well-Upper Zone



0 15 30
SCALE IN FEET



APARTMENTS

PARKING

COVENANT HOUSE CALIFORNIA

Fernwood Ave.

2

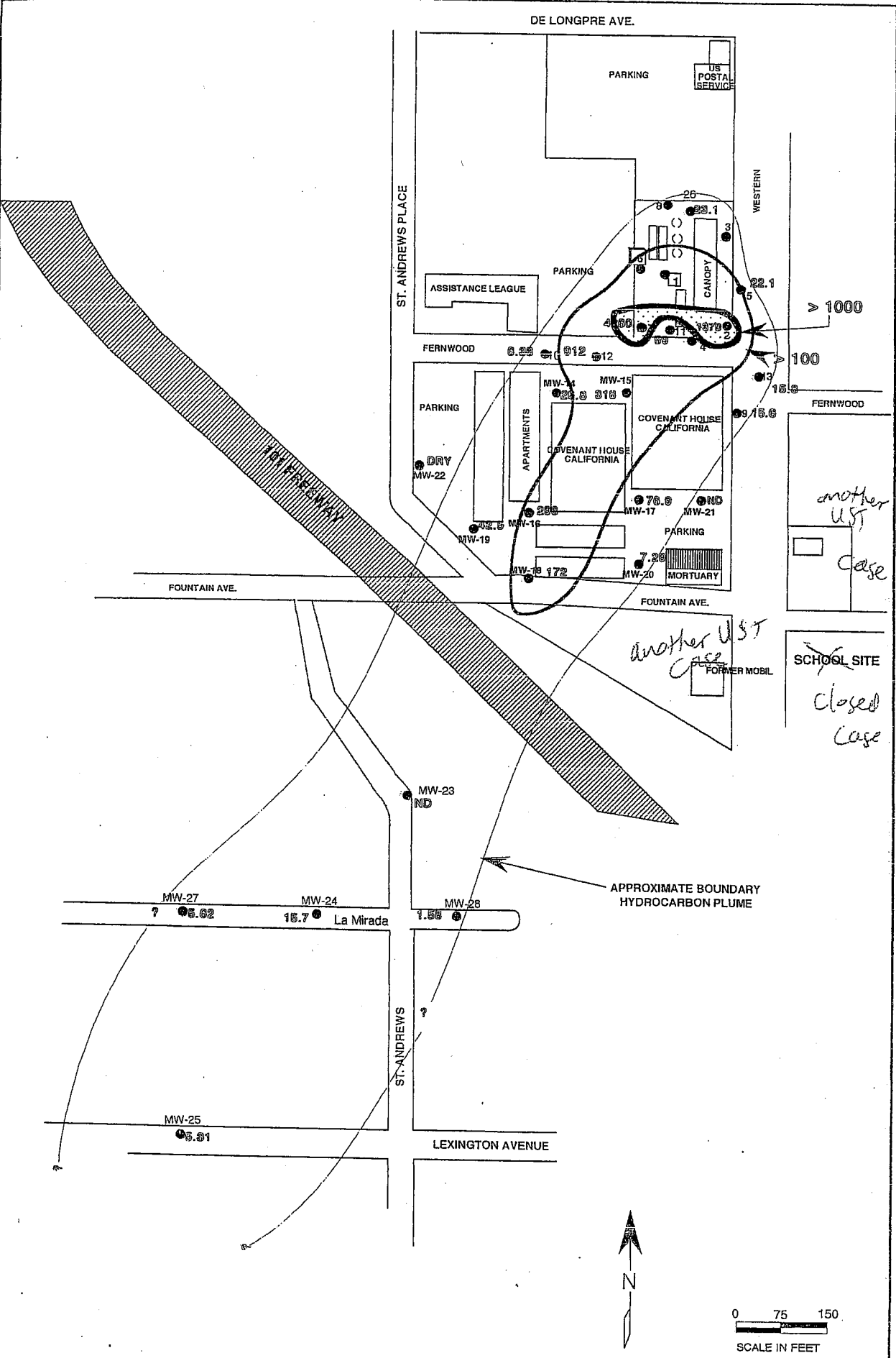
**ENVIRONMENTAL
CONSULTING &
CONSTRUCTION, INC.**

**BENZENE IN GROUNDWATER-
UPPER ZONE**
Former Gas-To-Go
Los Angeles, California

Project Number 1353	Date 3/09	PM	Figure 29
------------------------	--------------	----	--------------

3

Benzene



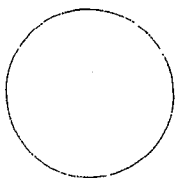
**ENVIRONMENTAL
CONSULTING &
CONSTRUCTION, INC.**

BENZENE IN GROUNDWATER (PPB)-LOWER ZONE
1353 N Western Ave.
Los Angeles, California
Fig 30

LEGEND

Groundwater Monitoring Well Location

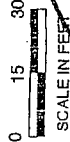
Treatment Well-LZ



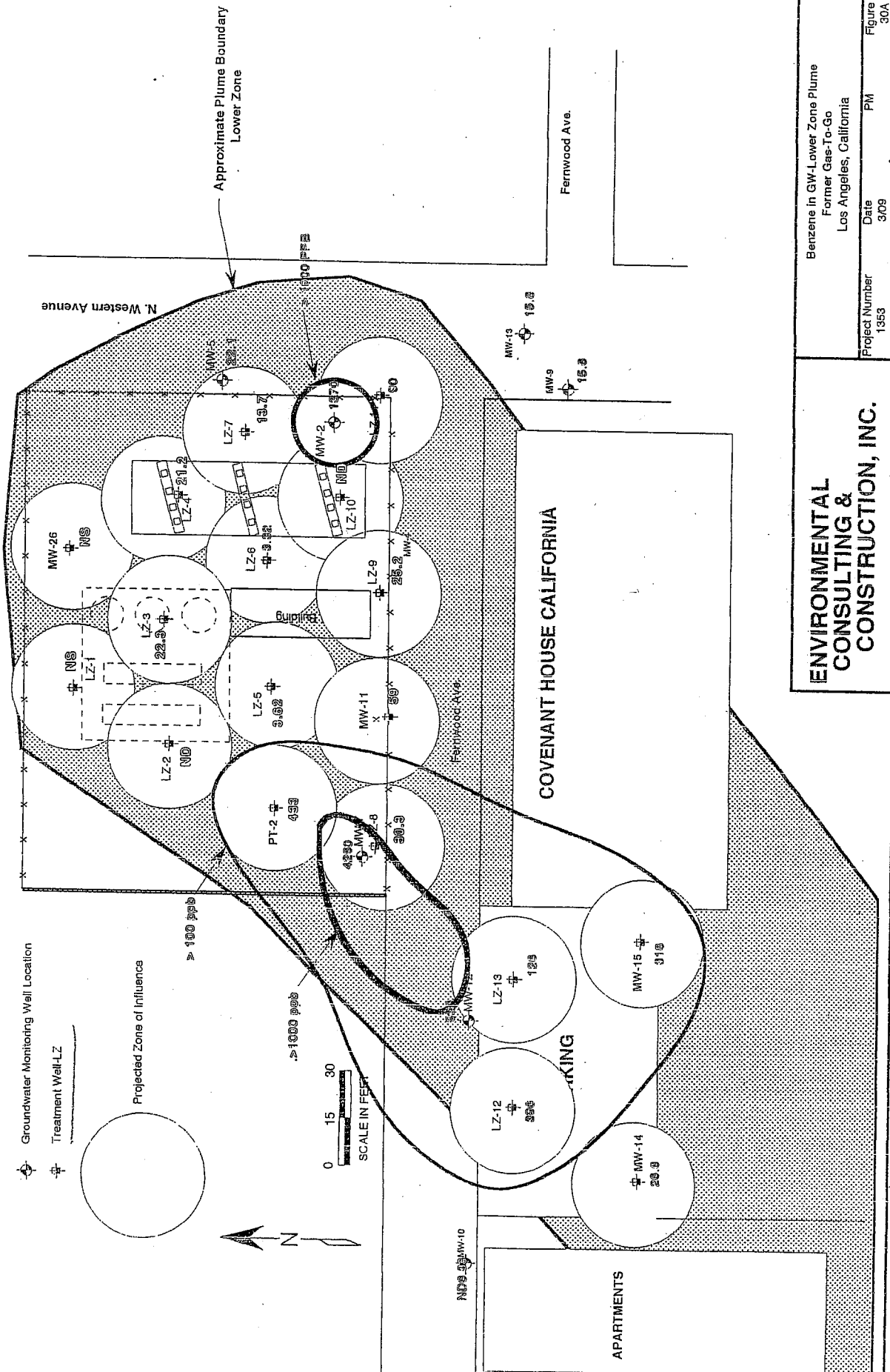
Projected Zone of Influence

> 100 PPFZ

> 1000 PPFZ



SCALE IN FEET



Benzene in GW-Lower Zone Plume
Former Gas-To-Go
Los Angeles, California

Project Number 1553
Date 3/09
PM
Figure 30A

**ENVIRONMENTAL
CONSULTING &
CONSTRUCTION, INC.**

4