

Los Angeles Regional Water Quality Control Board

April 26, 2012

Mr. James Velez-Conway
Office of Sustainability and the Environment
City of Santa Monica
200 Santa Monica Pier
Santa Monica, CA 90401

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT
PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR
HEXAVALENT CHROMIUM IMPACTED SITES
SANTA MONICA BUS MAINTENANCE YARD
1620 SIXTH STREET, SANTA MONICA (ID NO. 904010043) (D1 Priority)
(ORDER NO. R4-2007-0019, SERIES NO. 187; CI NO. 9811)
(File No. 12-020, Global ID# WDR100000842)**

Dear Mr. Velez-Conway:

We have completed our review of the application for coverage under the General Waste Discharge Requirements to apply chemical oxidant at the site referenced above in Santa Monica, California, for groundwater cleanup and remediation.

Since 1987, City of Santa Monica (CSM) has been conducting soil and groundwater investigations and cleanup at the site. Thirty-one groundwater monitoring wells have been installed. The remedial systems include a free-product and groundwater extraction system, an air/ozone-sparging system, and a mobile dual-phase extraction. Approximately 154 gallons of free product were removed. Confirmation soil sampling in 2006 indicated that the vadose zone contamination has been mitigated. In 2009, twenty groundwater wells were abandoned because of site development. Due to the persistent presence of sheen of free product in well MW-28B, CSM was required to continue groundwater cleanup.

In January 2012, ICF International (ICF) submitted a remedial action plan (RAP) to address the presence of free product observed in the area where a former stormwater clarifier and two oil-water separators were located. ICF proposes to use in-situ chemical oxidation technology to eliminate the remaining sheen of free product. ICF proposes to conduct two rounds of chemical oxidant (RegenOx®) injection through five injection points in the former oil-water separator area using direct-push technology. The RAP was approved in our letter dated February 1, 2012.

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 (General WDRs)," adopted by the Los Angeles Regional Water Quality Control Board on March 1, 2007. This Waste Discharge Requirements shall not be terminated without the regulatory oversight agency's prior approval.

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

Enclosed are your Waste Discharge Requirements, consisting of General WDRs Board Order No. 2007-0019, and Monitoring and Reporting Program (MRP) No. CI-9811 and Standard Provisions.

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 per these requirements, please include a reference to Compliance File No. CI-9811, 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.

In accordance with regulations adopted by the State Water Resource Control Board (State Board) in September 2004 regarding electronic submittal of information (ESI), the Discharger has been electronically submitting Underground Storage Program (UST) technical reports to the State Board Geotracker under the UST ID# 904010043 (continuing). To comply with this MRP, the Discharger shall upload the MRP reports to the Geotracker under the ID# WDR100000842. For more information regarding the new Global ID under WDRs, please see ESI training video at:

<https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>.

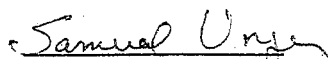
To avoid paying future annual fees, please submit written request for termination of your enrollment under the general permit in a separate letter when your project has been completed and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 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.

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, or on line 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 Dr. Eric Wu at (213) 576-6119 or send him an email at ewu@waterboards.ca.gov for administrative issues and Mr. Jay C. Huang at (213) 576-6711 or send him an email at jhuang@waterboards.ca.gov for technical issues.

Sincerely,


Samuel Unger, P.E.
Executive Officer

- Enclosures:
1. Board Order No. R4-2007-0019
 2. Monitoring and Reporting Program No. CI-9811
 3. Standard Provisions Applicable to WDRs

Mr. James Velez-Conway
City of Santa Monica

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cc: Kathy Jundt, State Water Resources Control Board, Underground Storage Tank
Cleanup Fund
Phuong Ly, Water replenishment District of Southern California
Monica Hanley, City of Santa Monica, Fire Department
Gary Glendenin, ICF International

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9811
FOR
SANTA MONICA MUNICIPAL BUS MAINTENANCE YARD
1620 SIXTH STREET, SANTA MONICA
(ORDER NO. R4-2007-0019, SERIES NO. 187)

I. REPORTING REQUIREMENTS

- A. City of Santa Monica (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for January-June 2012, shall be received at the Regional Board by July 15, 2012. 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

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.

- B. By January 30 of each year, beginning January 30, 2013, 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 Public Health 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) 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

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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.

- 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 Public Health, 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" 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.
- 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 Executive Officer's written approval.
- L. In accordance with regulations adopted by the State Board in September 2004

regarding electronic submittal of information (ESI), the Discharger has been electronically submitting UST monitoring reports to the State Board GeoTracker system under the UST ID 904010043. To comply with the (MRP) under this WDRs, the Discharger shall upload the WDRs monitoring reports to the Geotracker under the two ID 904010043 (continuing) and WDR100003995 (new).

II. Chemical Oxidant (RegenOx®) MONITORING REQUIREMENTS

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

1. Location map showing placement locations, used for the chemical oxidant (RegenOx®) (refer to attached Figure 1 for site map).
2. Written and tabular summary defining the quantity of chemical oxidant injected to the groundwater and a summary describing the days on which the injection system was in operation.

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total RegenOx® delivered per location	grams	--	• Semi-annually

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from up-gradient area groundwater monitoring wells MW-29; source area groundwater monitoring wells MW-28B; and down-gradient area groundwater monitoring wells MW-15, MW-22B, and MW-30 (Figure 1) on a semi-annual schedule to monitor the effectiveness of the in-situ groundwater remediation. Groundwater shall be monitored for the duration of the remediation before and after the injection of chemical oxidant in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS ¹	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg)	µg/L	Grab	• Semi-annual
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-annual

Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Semi-annual
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-annual ¹
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-annual
Oxidation-reduction potential	millivolts		• Semi-annual
Dissolved Oxygen	µg/L	Grab	• Semi-annual
Dissolved ferrous iron	µg/L	Grab	• Semi-annual
Total Chromium and chromium six ²	µg/L	Grab	• Semi-annual
PH	pH units	Grab	• Semi-annual
Temperature	F/ C	Grab	• Semi-annual
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-annual

- 1 µg/L=microgram per liter; mg/L=milligrams per liter.
- 2 The Discharger is required to monitor for these compounds only if they are detected in the first sampling event.
- 3 The Discharger is required to monitor for total chromium and chromium six only if they are detected in the first and third semi-annual sampling events.

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. 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 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.





VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall submit all reports under this MRP to the State Water Resources Control Board's Geotracker database under the Global ID WDR 100000842.

Ordered by: Samuel Unger
Samuel Unger, P.E.
Executive Officer

Date: April 26, 2012

Legend

-  Monitoring Well
-  Former Oil-water Separator
-  Area of Over Excavation
-  Proposed ISCO Injection Point

MW-29

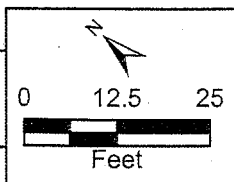
MW-28B

MW-15

MW-22B

MW-30

5th St



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Figure 1
Location of Proposed Injection Points in MW-28 Area