



Los Angeles Regional Water Quality Control Board

March 12, 2013

Mr. Neil Sparks  
RSC Equipment Rental  
6929 East Greenway Parkway, Suite 200  
Scottsdale, AZ 85254

Certified Mail with Return Receipt  
7012 1640 0000 6294 5229

**UNDERGROUND STORAGE TANK PROGRAM—DIRECTIVE TO TAKE CORRECTIVE ACTION AND GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER CLEANUP AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND AND/OR HEXAVALENT CHROMIUM IMPACTED SITES  
FORMER CONTRACTORS EQUIPMENT RENTAL  
2020 WEST PACIFIC COAST HIGHWAY, LONG BEACH  
(FILE NO. 97440225; ORDER NO. R4-2007-0019-211; CI NO 9010)**

Dear Mr. Sparks:

We have received the letter dated March 19, 2010, from your consultant, AECOM, containing the application for the coverage of the General Waste Discharge Requirements (R4-2007-0019) for your oxygen-releasing compounds (ORC) injection operations.

The subject site is a former gasoline retail station. All USTs have been removed from the site and currently there is a rental shop and an equipment maintenance building.

On-site assessment started in August 1996. To date, a total of 41 soil borings have been advanced and nine of the borings were completed as groundwater monitoring wells (MW-1 through -9). The assessment results indicated that the soil and groundwater beneath the site were impacted.

Remedial actions at the site included free product removal and soil vapor extraction with air sparging. The groundwater data from the second semi-annual monitoring event in 2011 indicated that TRPH was detected up to 92,700 µg/L, benzene 12,600 µg/L, and MTBE 17,600 µg/L.

To further remediate the residual contamination, in the "Supplemental Remedial Action Plan and Well Installation Workplan," (RAP) dated October, 2009, AECOM recommended the following remedial technologies: 1) in situ chemical oxidation (ISCO) followed by enhanced aerobic bioremediation (EAB) in the source area using sodium persulfate applied by injecting a solution activated with calcium peroxide into the hydrocarbon-affected interval of soil; 2) EAB in the area of the dissolved-phase groundwater plume using magnesium peroxide applied by injecting a solution into the hydrocarbon-affected interval of the plume; and 3) EAB along a treatment curtain located to intercept the dissolved-phase plume near the property line.

We have completed our review of the RAP and concur with the proposed supplemental remediation provided all the conditions required to implement the Remedial Action Plan contained in our letter of September 8, 2004, continue to be met.

We also completed review of your application and 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.

Enclosed are your Waste Discharge Requirements, consisting of the General WDRs R4-2007-0019, Monitoring and Reporting Program No. CI-9910 and Standard Provisions. These Waste Discharge Requirements shall not be terminated without Regional Board UST staff's prior approval.

When submitting technical monitoring reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9010, 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.

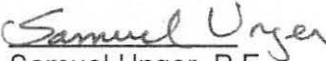
In accordance with regulations adopted by the State Board in September 2004 regarding electronic submittal of information, Underground Storage Tank Program (UST) monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0603701667. To comply with the MRP under this WDRs, you shall upload the WDRs monitoring reports to the Geotracker under the two Global ID T0603701667 (continuing) and WDR100000970 (new). For more information regarding the new Global ID under WDRs, please see ESI training video available at:

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

To avoid paying future annual fees, please submit a 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.

If you have any questions, please contact Mr. Gregg Kwey at (213) 576-6702 or [kwey@waterboards.ca.gov](mailto:kwey@waterboards.ca.gov) for issues regarding underground storage tanks, or Dr. Eric Wu at (213) 576-6683 or [ewu@waterboards.ca.gov](mailto:ewu@waterboards.ca.gov) for issues regarding the WDRs.

Sincerely,

  
Samuel Unger, P.E.  
Executive Officer

Enclosures:

1. General WDRs Order No. R4-2007-0019
2. Monitoring and Reporting Program No. CI-9910

cc: Ms. Kathy Jundt, SWRCB, Underground Tank Cleanup Fund  
Ms. Carmen Piro, City of Long Beach, Department of Health and Human  
Services  
Ms. Phuong Ly, Water Replenishment Distruct of Southern California  
Mr. Assaf Rees, AECOM

Los Angeles Regional Water Quality Control Board

**TO:** ORDER NO. R4-2007-0019, SERIES NO. 211

**FROM:** Gregg Kwey

**DATE:** March 12, 2013

**SUBJECT:** EVALUATION OF INFORMATION SUPPORTING GENERAL WASTE DISCHARGE REQUIREMENTS FOR GROUNDWATER REMEDIATION AT PETROLEUM HYDROCARBON FUEL, VOLATILE ORGANIC COMPOUND And/Or HEXAVALENT CHROMIUM IMPACTED SITES—FORMER CONTRACTORS EQUIPMENT RENTAL, 2020 WEST PACIFIC COAST HIGHWAY, LONG BEACH, (FILE NO. 908150107; ORDER NO. R4-2007-0019-211; CI NO. 9910)

RSC Equipment Rental (hereinafter Discharger) is responsible for the corrective activities at the subject site. All USTs have been removed from the site and currently there are a rental shop and equipment maintenance building.

On-site assessment started in August 1996. To date, a total of 41 soil borings have been advanced and nine of the borings were completed as groundwater monitoring wells (MW-1 through -9). The assessment results indicated that the soil and groundwater beneath the site were impacted.

Remedial actions at the site included free product removal, soil vapor extraction with air sparging. The groundwater data of second semi-annual monitoring event in 2011 indicated that TRPH was detected up to 92,700 µg/L, benzene 12,600 µg/L, and MTBE 17,600 µg/L.

To further remediate the residual contaminations, in the "Supplemental Remedial Action Plan and Well Installation Workplan," dated October 2009, the Discharger recommended the following remedial technologies: 1) in situ chemical oxidation (ISCO) followed by enhanced aerobic bioremediation (EAB) in the source area using sodium persulfate applied by injecting a solution activated with calcium peroxide into the hydrocarbon-affected interval of soil; 2) EAB in the area of the dissolved-phase groundwater plume using magnesium peroxide applied by injecting a solution into the hydrocarbon-affected interval of the plume; and 3) EAB along a treatment curtain located to intercept the dissolved-phase plume near the property line.

**Justification for General Waste Discharge Requirements**

The proposed injection satisfies all the criteria for enrollment under Board Order No. R4-2007-0019, "General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/Or Hexavalent Chromium Impacted Sites," adopted by this Regional Board on March 1, 2007, including:

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

MONITORING AND REPORTING PROGRAM NO. CI-9910

FOR

FORMER CONTRACTORS EQUIPMENT RENTAL  
2020 WEST PACIFIC COAST HIGHWAY, LONG BEACH  
(ORC INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4-2007-0019, SERIES NO. 211)

I. REPORTING REQUIREMENTS

- A. RSC Equipment Rental (hereinafter Discharger) shall implement this monitoring program on the effective date of this Monitoring and Reporting Program (MRP). The first monitoring report under this program, for the period from the effective date of this MRP to June 30, 2013, shall be received at the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) by July 15, 2013. 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. 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.
- C. The method limits (MLs) employed for analytical 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 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.

- D. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 Code of Federal Regulation Part 136. All QA/QC samples must be run on the dates when samples are actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request from the Regional Board.
- E. Each monitoring report must affirm in writing that "All analyses are 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 guideline procedures, or as specified in this MRP." Proper chain of custody procedure must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- F. Each monitoring report shall contain a separate section entitled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that are needed to bring the discharge into full compliance with Waste Discharge Requirements (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.
- G. 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.
- H. If the Discharger performs analyses on groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.
- I. 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.
- J. The Discharger should not implement any changes to the MRP prior to receiving Executive Officer's written approval.
- K. In accordance with regulations adopted by the State Board in September 2004 regarding electronic submittal of information, Underground Storage Tank Program (UST) monitoring reports have been electronically submitted to the State Board GeoTracker system under the UST Global ID T0603701667. To comply with the MRP under this WDRs, the Discharger shall upload the WDRs monitoring reports



to the Geotracker under the two Global ID T0603701667 (continuing) and WDR100000970 (new).

II. ORC INJECTION MONITORING REQUIREMENTS

The reports shall contain the following information regarding injection activities:

1. Written and tabular summary defining the quantity of ORC injected and a summary describing the days on which the injection system was in operation
2. Location map showing locations for ORC injection. Sixty four injection locations (see Figure 11) within the treatment area are currently proposed. Additional locations are permitted with Regional Board staff concurrence. Additional injection locations shall be reviewed and approved by the Regional Board. Please note groundwater wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, screening clogging and alteration.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from four up-gradient wells, MW-1, -2, -3 and -10, and four down-gradient monitoring wells (MW-6, -7, -8 and -11) on a semi-annual basis (see Figure 3 for groundwater flow direction and Figure 6 for representative groundwater benzene plume). Groundwater shall be monitored for the duration of the MRP in accordance with the following discharge monitoring program:

| CONSTITUENT   | UNITS | TYPE OF SAMPLE | MINIMUM FREQUENCY OF ANALYSIS <sup>1</sup> |
|---|-------|----------------|--|
| Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)  | µg/L  | Grab           | • Semi-Annually                            |
| Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)  | µg/L  | Grab           | • Semi-Annually                            |
| Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE), Naphthalene | µg/L  | Grab           | • Semi-Annually                            |

Monitoring and Reporting Program CI-9910

|   |   |         |                 |
|---|---|---------|-----------------|
| Ethanol<br>Formaldehyde<br>Acetone  | µg/L  | Grab    | • Semi-Annually |
| Total dissolved solids, Arsenic,<br>Boron, Chloride, Bromide,<br>Sulfate, Lead, Nickel, Cadmium,<br>Manganese | mg/L  | Grab    | • Semi-Annually |
| Oxidation-reduction potential   | millivolts  | Grab    | • Semi-Annually |
| Dissolved Oxygen  | µg/L  | Grab    | • Semi-Annually |
| Dissolved ferrous iron  | µg/L  | Grab    | • Semi-Annually |
| Total Chromium and hexavalent<br>chromium <sup>2</sup>  | µg/L  | Grab    | • Semi-Annually |
| pH  | pH units  | Grab    | • Semi-Annually |
| Temperature   | <sup>0</sup> F/ <sup>0</sup> C                      | Grab    | • Semi-Annually |
| Groundwater Elevation   | Feet, mean sea<br>level and below<br>ground surface | In situ | • Semi-Annually |

<sup>1.</sup> One week before injection and semi-annually thereafter.

<sup>2.</sup> The Discharger is required to monitor for total chromium and hexavalent chromium in the baseline, second and fourth semi-annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored semi-annually thereafter.

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-Annually 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 \_\_\_\_\_.

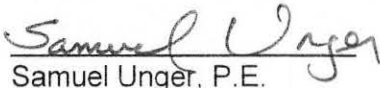
\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)"

VI. PUBLIC DOCUMENTS

These records and reports are public documents and shall be made available for inspection during normal business hours at the the Regional Board.

Ordered by:

  
Samuel Unger, P.E.  
Executive Officer

Date: March 12, 2013