

Environmental Protection

California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair

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14 December 2011

Mike Bauer Chevron Environmental Management Company Marketing Business Unit 145 South State College Boulevard, Room 408 Brea, CA 92821

NOTICE OF APPLICABILITY OF GENERAL ORDER NO. R5-2008-0149 - 036 CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY, FORMER UNOCAL BULK TERMINAL 30-6465, 13941 RIVER ROAD, WALNUT GROVE, IN-SITU REMEDIATION OF PETROLEUM HYDROCARBONS, SACRAMENTO COUNTY

The Chevron Environmental Management Company (Discharger) submitted a Notice of Intent, dated 19 August 2011, requesting coverage under General Order No. R5-2008-0149, General Waste Discharge Requirements for In-situ Groundwater Remediation at Sites with Volatile Organic Compounds, Nitrogen Compounds, Perchlorate, Pesticides, Semi-Volatile Compounds and/or Petroleum Compounds. Based on information in your submittal, it is our determination that this project meets the required conditions to be approved under Order No. 2008-0149. All of the requirements contained in the general order are applicable to your project. You are assigned Order No. R5-2008-0149-036

Project Location:

The project is in the City of Walnut Grove in Sacramento County, Latitude 38.249, Longitude (-)121.5094 (NAD 83 Coordinate System). Assessor's Parcel No. 146-0160-002-0000.

Project Description:

Operations at the Former Unocal Bulk Fuel Facility at 13941 River Road in Walnut Grove caused pollution of the soil and groundwater. The principal pollutants of concern are total petroleum hydrocarbons in the diesel and motor oil range. The facility was in operation until 1980 when all 11 above ground storage tanks were removed. Minimal active remediation has taken place at the site and currently the concentration of total petroleum hydrocarbon is up to 160 mg/L with a corresponding Water Quality Objective of 100 μ g/L. One monitor well periodically contains slight levels of free phase product on the order of 0.1-inch.

The goal of this project is to attempt to liberate the high concentrations of total petroleum hydrocarbons in and around the monitor well containing periodic measurable levels of free product and remove the residual free product. To do so, the Discharger is proposing to inject 3 gallons of surfactant mixed with 72 gallons of potable water into monitor well MW-2. One day later the Discharger will commence extracting from MW-2

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and extract at a rate of 5 -12 gallons per minute until at least 300 gallons have been removed. An aquifer test conducted at MW-2 demonstrated that adequate capture of the injectant will occur during extraction at MW-2. The Discharger may apply subsequent doses of the surfactant at the same rate until residual product is no longer present. Extracted water is contained and will be discharged to an appropriate facility to handle the waste. A sufficient number of monitor wells already exist at the site to monitor this project. The Discharger will also be conducting sampling and reporting the results as described in the attached Groundwater Monitoring and Reporting Program.

No comments were received on the draft Notice of Applicability and Monitoring and Reporting Program during the 30-day public comment period ending 8 December 2011.

General Information:

- 1. The project will be operated in accordance with the requirements contained in the General Order and in accordance with the information submitted in the Notice of Intent.
- The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this Notice of Applicability is officially revoked.
- 3. Injection of materials other than a 4% solution of Ivey-Sol 106 surfactant and water into the subsurface is prohibited.
- 4. Failure to abide by the conditions of the General Order could result in an enforcement action as authorized by provisions of the California Water Code.
- 5. The project will implement the final contingency plan included as part of the Notice of Intent within 30-days of it being triggered.
- The Discharger shall comply with the attached Monitoring and Reporting Program, Order No. R5-2008-0149-036, and any revisions thereto as ordered by the Executive Officer.

If you have any questions regarding this matter, please call Alexander MacDonald at (916) 464-4625 or contact him at amacdonald@waterboards.ca.gov.

Original signed by:

PAMELA C. CREEDON Executive Officer

Attachments

cc: Della Kramer, Regional Water Quality Control Board, Sacramento Brian Silva, Consetoga-Rovers and Associates, Rancho Cordova Sue Erickson, Sacramento County Environmental Management, Sacramento

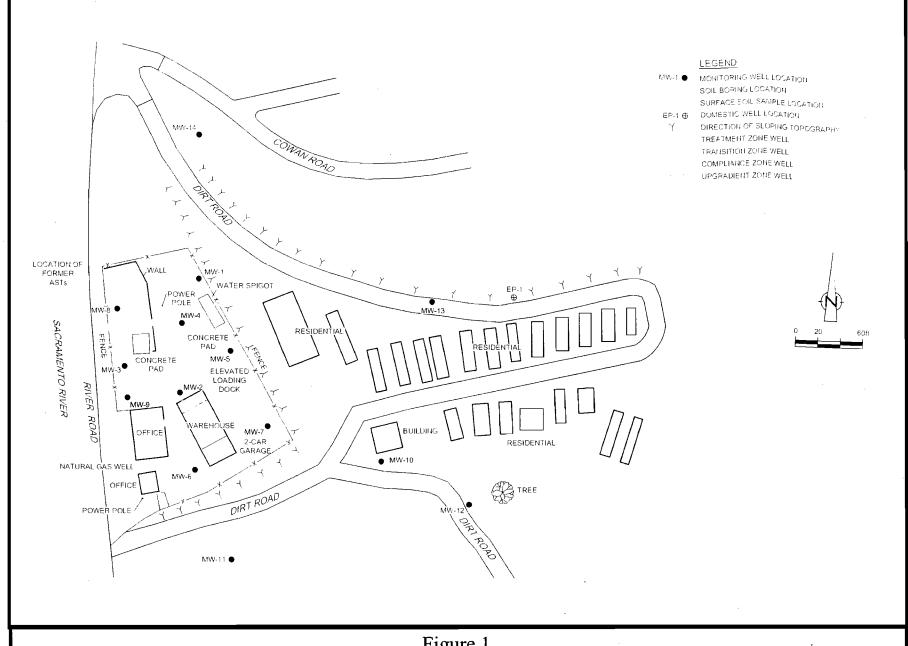


Figure 1
Former Unocal Bulk Terminal 30-645
Monitor Well Locations

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. R5-2008-0149-036

FOR

CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY, FORMER UNOCAL BULK TERMINAL 30-6465, WALNUT GROVE IN-SITU REMEDIATION OF PETROLEUM HYDROCARBONS SACRAMENTO COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a groundwater extraction and treatment system. This MRP is issued pursuant to Water Code Section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer. As appropriate, Regional Board staff shall approve specific sample station locations prior to implementation of sampling activities.

All samples should be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form.

GROUNDWATER MONITORING

As shown on Figure 1, there are 14 monitor wells associated with this site, not all of which will be monitored under this program. The groundwater monitoring program for these wells and any treatment system wells installed subsequent to the issuance of this MRP, shall follow the schedule below. Monitor wells with free phase petroleum product or visible sheen shall be monitored, at a minimum, for product thickness and depth to water. The volume of extracted groundwater, if applicable, shall also be provided in quarterly monitoring reports. Sample collection and analysis shall follow standard EPA protocol.

The monitor wells, extraction wells and/or injection wells shall be sampled according to the schedule in Table 1 and the samples analyzed by the methods in Table 2, as follows:

Table 1: Sampling Frequency and Constituent Suite

Well Number ¹	Frequency ²	Constituent Suite(s) ³	Monitoring Objective
MW-13, MW-10	Quarterly	Suites A, B and C	Compliance ⁴
MW-2	Quarterly	Suites A, B and C	Treatment Zone⁵
MW-4, MW-5, MW-7	Quarterly	Suites A, B and C	Transition Zone

- Well numbers as shown on Figure 1.
- Prior to startup and stated frequency thereafter.
- Constituent suite components listed in Table 2.
- Wells used to determine compliance with water groundwater limitations.
- Wells sampled to evaluate progress inside the treatment zone.

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Table 2: Analytical Methods

Constituent	Method ¹	Maximum Practical Quantitation Limit (μg/L) ²
Suite A		
Total Petroleum Hydrocarbons	EPA Method 8015M	50
Suite B		
Iron, Total and Dissolved	EPA Method 200.7	100
Manganese, Total and	EPA Method 200.7	25
Dissolved		
Suite C		
Total Dissolved Solids	EPA 160.1	10,000

Or an equivalent EPA Method that achieves the maximum Practical Quantitation Limit.

FIELD SAMPLING

In addition to the above sampling and analysis, field sampling and analysis shall be conducted each time a monitor well or extraction well is sampled. The sampling and analysis of field parameters shall be as specified in Table 3.

Table 3: Field Sampling Requirements

Parameters	Units	Type of Sample
Groundwater Elevation	Feet, Mean Sea Level	Measurement
Oxidation-Reduction Potential	millivolts	Grab
Electrical Conductivity	µhmos/cm	Grab
Dissolved Oxygen	mg/L	Grab
pH	pH Units (to 0.1 units)	Grab

Field test instruments (such as those used to test pH and dissolved oxygen) may be used provided that:

- 1. The operator is trained in proper use and maintenance of the instruments;
- 2. The instruments are calibrated prior to each monitoring event;
- 3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
- 4. Field calibration reports are submitted as described in item (b) of the "Reporting" section of this MRP.

DISCHARGE MONITORING

The Discharger shall monitor daily the discharge of water and amendments that are injected into the groundwater according to the requirements specified in Table 4. Each amendment

All concentrations between the Method Detection Limit and the Practical Quantitation Limit shall be reported as an estimated value.

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addition shall be recorded individually, along with information regarding the time period over which the amendment was injected into the aquifer.

Table 4: Discharge Monitoring Requirements

Parameters	Units	Type of Sample
Injected Volume	gallons per day	Meter
Amendment(s) Added	kilograms per day	Measured

AMENDMENT ANALYSIS

Amendments shall be analyzed for the constituents listed in Table 5. The analysis should be done on the pure amendment and on a mixture of the amendment and deionized water at the estimated concentration that would be injected during the pilot project.

Table 5: Amendment Analytical Requirements

Constituent	Method ¹	Maximum Practical Quantitation Limit (µg/L) ²
Volatile Organic Compounds	EPA 8020 or 8260B	0.5
General Minerals ³		
Metals, Total and Dissolved ⁴	EPA 200.7, 200.8	Various
Semi-Volatile Organic Compounds	EPA Method 8270	5.0
Total Dissolved Solids	EPA 160.1	10,000
pH	meter	NA
Electrical Conductivity	meter	NA

Or an equivalent EPA Method that achieves the maximum Practical Quantitation Limit.

ESTABLISHEMENT OF BACKGROUND CONCENTRATION VALUES

The Discharger submitted sufficient information to develop proposed background concentrations in its NOI for concentrations of dissolved iron, dissolved manganese and total dissolved solids in groundwater. Given the short duration of the project and content of the injectant, no additional background sampling is required.

REPORTING

When reporting the data, the Discharger shall arrange the information in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized in such a manner as to illustrate clearly the compliance with this Order. In addition, the Discharger shall notify the Regional Board within 48 hours of any unscheduled shutdown of any soil vapor and/or groundwater extraction system. The results of any

All concentrations between the Method Detection Limit and the Practical Quantitation Limit shall be reported, and reported as an estimated value.

³ Alkalinity, bicarbonate, potassium, chloride, sulfate, total hardness, nitrate, nitrite, ammonia.

Metals include arsenic, barium, cadmium, calcium, total chromium, copper, iron, lead, manganese, magnesium, mercury, molybdenum, nickel, selenium and silica.

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monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall also be reported to the Regional Board.

As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, all reports shall be prepared by a registered professional or their subordinate and signed by the registered professional.

The Discharger shall submit quarterly electronic data reports, which conform to the requirements of the California Code of Regulations, Title 23, Division 3, Chapter 30. The quarterly reports shall be submitted electronically over the internet to the Geotracker database system by the 1st day of the second month following the end of each calendar quarter by 1 February, 1 May, 1 August, and 1 November until such time as the Executive Officer determines that the reports are no longer necessary.

Hard copies of quarterly reports shall be submitted to the Regional Board by the 1st day of the second month following the end of each calendar quarter (i.e., by 1 February, 1 May, 1 August, and 1 November). Each quarterly report shall include the following minimum information:

- (a) a description and discussion of the groundwater sampling event and results, including trends in the concentrations of pollutants and groundwater elevations in the wells, how and when samples were collected, and whether the pollutant plume(s) is delineated;
- (b) field logs that contain, at a minimum, water quality parameters measured before, during, and after purging, method of purging, depth of water, volume of water purged, etc.;
- (c) groundwater contour maps for all groundwater zones, if applicable;
- (d) pollutant concentration maps for all groundwater zones, if applicable;
- (e) a table showing well construction details such as well number, groundwater zone being monitored, coordinates (longitude and latitude), ground surface elevation, reference elevation, elevation of screen, elevation of bentonite, elevation of filter pack, and elevation of well bottom;
- (f) a table showing historical lateral and vertical (if applicable) flow directions and gradients;
- (g) cumulative data tables containing the water quality analytical results and depth to groundwater;
- (h) a copy of the laboratory analytical data report, which may be submitted in an electronic format;

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- (i) the status of any ongoing remediation, including an estimate of the cumulative mass of pollutant removed from the subsurface, system operating time, the effectiveness of the remediation system, and any field notes pertaining to the operation and maintenance of the system; and
- (j) if applicable, the reasons for and duration of all interruptions in the operation of any remediation system, and actions planned or taken to correct and prevent interruptions.

If requested, an Annual Report shall be submitted to the Regional Board by 1 February of each year. This report shall contain an evaluation of the effectiveness and progress of the investigation and remediation, and may be substituted for the fourth quarter (or second semiannual) monitoring report. The Annual Report shall contain the following minimum information:

- (a) both tabular and graphical summaries of all data obtained during the year;
- (b) groundwater contour maps and pollutant concentration maps containing all data obtained during the previous year:
- (c) a discussion of the long-term trends in the concentrations of the pollutants in the groundwater monitoring wells:
- (d) an analysis of whether the pollutant plume is being effectively treated;
- (e) a description of all remedial activities conducted during the year, an analysis of their effectiveness in removing the pollutants, and plans to improve remediation system effectiveness:
- (f) an identification of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program; and
- (g) if desired, a proposal and rationale for any revisions to the groundwater sampling plan frequency and/or list of analytes.

A letter transmitting the monitoring reports shall accompany each report. Such a letter shall include a discussion of requirement violations found during the reporting period, and actions taken or planned for correcting noted violations, such as operation or facility modifications. If the Discharger has previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the penalty of perjury statement by the Discharger, or the Discharger's authorized agent, as described in the Standard Provisions General Reporting Requirements Section B.3.

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The Discharger shall implement the above monitoring program on the first day of the month following adoption of this Order.

	Original signed by:
Ordered by:	PAMELA C. CREEDON Executive Officer
	13 December 2011 (Date)
	Ordered by:

09/02/2011:AMM