California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Ste A
Santa Rosa, CA 95403
(707) 576-2220

May 16, 2007

NOTICE OF INTENT

GENERAL WASTE DISCHARGE REQUIREMENTS

FOR

ADDITION OF OXYGEN RELEASING COMPOUNDS TO GROUNDWATER

Pepsi Bottling Group Facility
2433 Second Street
Eureka, California
Humboldt County

The Pepsi Bottling Group Facility (Site) located at 2433 Second Street in Eureka, California is used as a product distribution plant and warehouse facility. This Site is bounded by Second Street to the west and a drainage ditch to the north. An unnamed slough is adjacent to the south and east of the Site and this unnamed slough drains into Eureka Slough as part of Humboldt Bay.

In 1991, the California Regional Water Quality Control Board (CRWQCB), North Coast Region requested an investigation at the Site and Total Petroleum Hydrocarbons (TPH) as gasoline and gasoline-constituents (benzene, toluene, ethylbenzene, xylenes [BTEX]) were identified in soil and groundwater beneath the Site. A buried product line associated with an unleaded gasoline aboveground storage tank was identified as the source of the release that resulted in soil and groundwater contamination. From January through August 1992, contaminated soil was excavated from the Site to a depth of approximately 6.5 below ground surface. A groundwater remediation system composed of extraction wells, extraction pumps, and blower operated between 1995 and 1997. Groundwater sample results in September 2004 indicated that TPH as gasoline and BTEX contamination had been significantly reduced. Additional Site investigation in 2006 detected residual TPH as gasoline and BTEX contaminants in soil and groundwater along the unnamed slough bank at the southeastern side of the Site. This remaining residual contamination is the focus of this Notice.

In June 2006, a revised Remedial Action Plan (RAP) was submitted to and approved by the CRWQCB. This revised RAP proposed excavation of contaminated soils and replacement with clean backfill material, the addition of Oxygen Release Compounds (ORC®) to the backfill material, and continued water quality monitoring of groundwater and slough waters. The ORC® is a proprietary formulation of phosphate-intercalated magnesium peroxides that, when hydrated; produce a controlled release of oxygen. The addition of ORC® is intended to remediate residual contaminated soils and groundwater that were not removed during excavation efforts. This treatment effort is consistent with

the intent to comply with General Waste Discharge Requirement (GWDR) Order No. R1-2000-51. The treatment effort is scheduled to begin in early July 2007 and is expected to be completed within three weeks of implementation. Post treatment groundwater and slough water monitoring and reporting to the CRWQCB shall continue for at least four quarters following treatment implementation to determine the effectiveness of treatment.

Any interested party may contact David W. Parson with the California Regional Water Quality Control Board (CRWQCB), North Coast Region at (707) 576-2556 or submit comments to his attention to the CRWQCB office at 5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403. General WDRs Order No. R1-2000-51, related documents, and comments received are on file and may be inspected or copied at the CRWQCB office Monday through Friday from 8:00 a.m. to 5:00 p.m. Appointments are recommended for file review and can be made by calling (707) 576-2220. The public comment period will be completed 30-days from the issuance of this notice.

Catherine E. Kuhlman
Executive Officer

May 2006

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