



California Regional Water Quality Control Board Central Valley Region

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Arnold
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Governor

17 August 2010

Mr. Nathan Ladd
Holt of California
7310 Pacific Avenue
Pleasant Grove, CA 95668

NOTICE OF APPLICABILITY - ORDER R5-2008-0149-007, HOLT OF CALIFORNIA, 7310 PACIFIC AVENUE, PLEASANT GROVE, SUTTER COUNTY

On 21 April 2010, e²M submitted a Notice of Intent (NOI) and supporting technical information in order to obtain coverage under Waste Discharge Requirements General Order R5-2008-0149 (the General Order) on your behalf for your site at 7310 Pacific Avenue in Pleasant Grove. Central Valley Water Board staff determined that the NOI and supporting technical information were complete on 28 May 2010. On 13 August 2010, the 45-day Public Participation was completed with no comments received by this agency.

The NOI describes the discharge of injected ozone into groundwater from an ozone generation and injection system. The treatment system has been designed to remove petroleum hydrocarbon contaminants, including methyl tertiary butyl ether (MTBE), from the extracted groundwater. This Notice of Applicability (NOA) does not modify the existing requirements that regulate the discharge of treated groundwater to land from the existing groundwater pump and treatment system; this activity is regulated separately by Waste Discharge Requirements (WDRs) General Order R5-2003-0044.

The General Order includes a Monitoring and Reporting Program (MRP) that prescribes minimum monitoring requirements. The MRP requires sampling and analytical testing for specific petroleum hydrocarbon and secondary constituents in monitoring wells. Additional and/or modifications to the MRP are included in the Additional Requirement section of this Notice of Applicability (NOA).

Based on our review of the information provided, we have determined this project meets the required conditions to be approved under the General Order. All requirements contained in the General Order and/or modified by this NOA are applicable to your project. You are hereby assigned **General Order R5-2008-0149-007** to regulate the discharge of ozone injection used to treat groundwater insitu at the Holt of California site.

PROJECT LOCATION

The Holt of California site is located at 7310 Pacific Avenue near Pleasant Grove, California. The legal description for the site is: Assessor's Parcel Number 35220008, Latitude 38.7717605°N, Longitude 121.52388929°W, Township/Range/Section 11N, 4E, S 27. The closest surface water body is the Natomas East Main Drainage Canal located approximately 1 mile from the site.

California Environmental Protection Agency

PROJECT DESCRIPTION

The Holt of California site is currently a heavy equipment dealership with rentals, sales and service, and currently dispenses vehicle fuel from above-ground storage tanks. In November 1990, three underground storage tanks (USTs) were removed. Soil samples from beneath the removed USTs were collected and analyzed. Elevated concentrations of petroleum hydrocarbon contamination were found. From September 1994 to the present, 19 groundwater monitoring and one soil vapor extraction wells have been installed and sampled. As a result of the investigative activities, lead regulatory agency San Joaquin County Environmental Health Department (SJCEHD) staff determined that remedial measures were required to clean up the identified contaminant plume. In April 2004, SJCEHD staff approved your corrective action plan for groundwater remediation, utilizing pump and treat technology. In addition, you have requested and SJCEHD approved ozone injection into the aquifer (in-situ chemical oxidation) to supplement the existing groundwater remediation. SJCEHD informed you that injecting ozone into groundwater requires a permit from the Central Valley Water Board, and you complied by submitting the Notice of Intent.

Holt of California will inject ozone from an onsite ozone generator into monitoring wells MW-13, MW-15, MW-31, and MW-32A. The remedial process will remove the petroleum hydrocarbons. Analytical testing will be performed on nearby monitoring wells per the attached Monitoring and Reporting Program (MRP), to determine if ozone injection is effective in destroying petroleum hydrocarbons and to monitor for increases in dissolved levels of specified metals, which may be caused by oxidation of native metals in soil. There are no surface waters associated with this project.

ADDITIONAL REQUIREMENTS

1. For this project, Holt of California is to include total petroleum hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), a full scan of the volatile organic compounds, specific metals and general minerals as listed in the MRP. Samples are to be collected and analyzed in accordance with locations and frequencies directed in the General Order and the associated MRP. Pesticides and poly aromatic hydrocarbons (PAHs) were sampled in groundwater one time in January 2005 for the WDRs permit. Pesticides were not present at detection limits below the Central Valley Water Board's Water Quality Goals (WQGs); hence pesticides analysis is removed from the MRP. In January 2005, the only PAHs reported above method detection limits (MDLs) was naphthalene. At that time, a comparison of USEPA Method 8310 (PAHs) and USEPA Method 8260B (Volatile Organic Compounds) showed no significant difference in naphthalene results for each method. Therefore, the full-scan USEPA Method 8260B will be sufficient as a more cost-effective method for reporting naphthalene.
2. The NOI uses the Primary Maximum Contaminant Levels as the MDLs for each analysis. Since there are additional WQGs based on toxicity and taste and odor below the MDLs, and since the waters are considered a source of drinking water, the MDLs shall be sufficiently low enough to determine compliance with applicable groundwater WQGs, which may be searched online by specific constituent at http://www.waterboards.ca.gov/water_issues/programs/water_quality_goals/.
3. Further reductions in sampling may be directed by Central Valley Water Board staff as appropriate and after two consecutive results show specific constituents do not exceed Water Quality Goals.

4. The required annual fee (as specified in the annual billing invoice to be issued by the State Water Resources Control Board) shall be submitted until this NOA is officially withdrawn.

If you have any questions regarding this NOA, please telephone James Barton at (916) 464-4615, or by e-mail at jbarton@waterboards.ca.gov.

PAMELA CREEDON
Executive Officer

APPROVED

Author _____

Senior _____

Enclosure: General Order R5-2008-0149

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