

Los Angeles Regional Water Quality Control Board

October 2, 2015

Ms. Laura Fleming, Chief,
Environmental Division
DLA Installation Support for Energy
8725 John J. Kingman Road
Fort Belvoir, Virginia 22060-6222

CHANGE OF REMEDIATION MATERIAL SUPPLIERS – DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (FILE NO. 90-60-145, ORDER NO. 90-148, CI-10118, GEOTRACKER GLOBAL ID. SLT43185183)

Dear Ms. Fleming:

On February 6, 2015, the Executive Office of the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), granted coverage of General Waste Discharge Requirements (General WDRs, Order No. 90-148) to on-site bioremediation of petroleum hydrocarbon contaminated soil at the subject site. The proposed remediation included adding Bio-Reclaim™, an US EPA approved bioremediation agent that contains a proprietary blend of non-pathogenic microbes and a surfactant (Bio-Surf) to degrade petroleum hydrocarbons and other organic compounds into carbon dioxide and water. Both Bio-Reclaim™ and Bio-Surf were provided by F4 Remediation, Inc. (F4), which was subcontracted to conduct the proposed bioremediation. The General WDRs, Provision C.4., require that *“In accordance with Section 13260 of the California Water Code, the discharger shall file a report with this Regional Board of any material change or proposed change in the character, location or volume of the discharge.”*

Reference is made to a letter that you submitted to the Regional Board, dated September 15, 2015, notifying Regional Board staff that a new subcontractor, Bulldog Green Remediation, Inc. (BGR), had been selected to replace F4 and that new suppliers of both the microbes and surfactant had been secured. Specifically, the bioremediation agent Tomadol® microbe and Tomadol 91-6 surfactant from BGR had been used to replace Bio-Reclaim™ and Bio-Surf, respectively. Your letter indicates that, despite of the name change, the active ingredients of the treatment solution had not changed and that the new suppliers were selected to eliminate the need to import the US-made material through Canada and to provide more flexibility in schedule and faster product delivery.

We have reviewed information provided in your letter and concur with you that the reported change in suppliers for the microbes and the surfactant used in the bioremediation does not constitute a “material change” referred in Provision C.4. of the General WDRs.

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If you have any questions regarding the General WDRs, please contact me at (213) 620-2253 or wen.yang@waterboards.ca.gov. Questions related to the remediation of the site in general should be directed to Mr. Paul Cho, Case Manager from the Regional Board Site Cleanup Program, at (213) 576-6721 or paul.cho@waterboards.ca.gov.

Sincerely,



Wen Yang, Ph.D, C.E.G.
Chief, Land Disposal Unit

CC: Adriana Figueroa, City of Norwalk (afigueroa@ci.norwalk.ca.us)
Neil Irish, The Source Group (nirish@thesourcegroup.net)