State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Water Board)	Address: 320 West 4th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Noman Chowdhury	Case No.: I-11530

Case Information

USTCF Claim No.: 7276	GeoTracker Global ID: T0603703811
Site Name: American Medical Enterprises	Site Address: 12508 East Lambert Road Whittier, CA 90606
Responsible Party: AME, Inc. Attn: Joan Woehrmann	Address: Private Address
Responsible Party: Encon Attn: Joe Scatoloni	Address: 12145 Mora Drive, #7 Santa Fe Springs, CA 90670
USTCF Expenditures to Date: $707,166	Number of Years Case Open: 24

To view all public documents for this case available on GeoTracker use the following URL:
http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603703811

Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case meets all of the required criteria of the Policy. Highlights of the case follow:

This case is a medical building and former commercial petroleum fueling facility. An unauthorized release was reported in July 1990 following the removal of one gasoline UST. An unknown volume of contaminated soil was excavated in 1990. Soil vapor extraction (SVE) was conducted between February 2011 and October 2012, which removed 8,364 pounds of total petroleum hydrocarbons as gasoline (TPHg). By the end of the SVE operation, the extracted soil vapor concentrations had reduced significantly; it was determined continued operation would not be cost effective. Active remediation has not been conducted for the past four years. Since 1992, eight groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the projected plume boundary. No other water supply wells have been identified within 1,000 feet of the projected plume boundary in files reviewed. The unauthorized release is located within the service area of a public water system, as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected shallow groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of the affected shallow groundwater are

not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting. Remaining petroleum hydrocarbon constituents are limited and stable, and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 micrograms per liter (µg/L) and the dissolved concentration of methyl tert-butyl ether (MTBE) is less than 1,000 µg/L.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. An unknown volume of contaminated soil was excavated in 1990. SVE was conducted between February 2011 and October 2012, which removed 8,364 pounds of TPHg. By the end of the SVE operation, the extracted soil vapor concentrations had reduced significantly; it was determined continued operation would not be cost effective.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Determination
Based on the review performed in accordance with Health & Safety Code Section 25299.39.2 subdivision (a), the Fund Manager has determined that closure of the case is appropriate.

Recommendation for Closure
Based on available information, residual petroleum hydrocarbons at the Site do not pose a significant risk to human health, safety, or the environment, and the case meets the requirements of the Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board staff is conducting public notification as required by the Policy. Los Angeles County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock — 7/6/15

Lisa Babcock, P.G. 3939, C.E.G. 1235 — **Date**

Prepared by: Kirk Larson, P.G.

Objections to Closure and Responses for
American Medical Enterprises Located at 12508 East Lambert Road, Whittier
Claim 7276

On May 15, 2015 the Review Summary Report was sent to the Los Angeles Regonal Water Board for their review along with an invitation to discuss any concerns they have regarding the Closure Recommendation. No comments were received or an acceptance to discuss the recommendation. However, according to the Low Threat Closure Policy Checklist in GeoTracker, finalized on May 27, 2015, the Regional Water Board staff objects to UST case closure because:

Comment: No soil vapor samples have been collected. There is no oxygen data.
Response: There is no detectable benzene (or any petroleum hydrocarbons) in groundwater beneath the Site; therefore there is no risk of benzene vapor intrusion.

In addition, depth to groundwater is 50+ feet bgs and only one out of 34 soil samples collected in 2010 indicated concentrations of TPHg above 100 milligrams per kilogram g/kg, therefore, the data indicate that there is an approximately 50 foot bioattenuation zone between ground water and the surface. Therefore, this case meets the Petroleum Vapor to Indoor Air Intrusion Criteria, Dissolved Phase Benzene Concentrations in Groundwater, using Scenario 3a. The maximum benzene concentration in groundwater is less than 100 micrograms per liter (µg/L). The minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons (TPH).