State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
PRELIMINARY REVIEW – SEPTEMBER 2014

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: Nhan Bao	Case No.: I-10618

Case Information

USTCF Claim No.: 17632	GeoTracker Global ID: T0603703636
Site Name: ARCO #5308	Site Address: 15025 Downey Avenue Paramount, CA 90723
Responsible Party: ARCO Attn: Janet Wager	Address: 201 Helios Way, 6th Floor Houston, TX 77079
USTCF Expenditures to Date: $0	Number of Years Case Open: 21

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=T0603703636

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 does not meet all of the required criteria of the Policy. Highlights of the case follow:

This Site is an active commercial petroleum fueling facility. Three gasoline USTs were removed in October 1986. An unauthorized release was reported in April 1993. Reportedly, 500 cubic yards of impacted soil was excavated in October 1986. Groundwater extraction was conducted between August 2000 and January 2002, which removed 15,010 gallons of contaminated groundwater. Soil vapor extraction and air sparging were conducted between 2004 and June 2012, which removed 3,572 pounds of total petroleum hydrocarbons as gasoline (TPHg). The rate of removal in June 2012 was 0.169 pounds of TPHg per day. Active remediation has not been conducted at the Site for the past 2 years. Since 1993, 11 groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved except methyl tert-butyl ether (MTBE) and tert-butyl alcohol (TBA).

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.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case does not meet Policy criteria because the MTBE and TBA contaminant plume that exceeds water quality objectives is not adequately defined downgradient (northwest and southwest) of the source area.
- Vapor Intrusion to Indoor Air: The case meets the Policy Exclusion for an Active Commercial Petroleum Fueling Facility. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk.
- 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.

Objections to Closure and Responses

According to the Path to Closure page in GeoTracker, finalized on May 19, 2014, the Regional Water Board objects to UST case closure because:

- Inadequate conceptual site model.
  RESPONSE: Adequate data is available in GeoTracker to develop a conceptual site model as defined by the Policy.
- Secondary source remains.
  RESPONSE: Secondary source as defined by the Policy was removed by excavation and active remediation.
- The case does not meet Policy groundwater criteria.
  RESPONSE: We concur.

Recommendation

The Fund concurs with the Regional Water Board September 5, 2014 letter approving additional groundwater investigation.

9/30/14

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