



State Water Resources Control Board

**DRAFT
REVIEW SUMMARY REPORT – ADDITIONAL WORK
PRELIMINARY REVIEW – SEPTEMBER 2014**

Agency Information

Agency Name: Los Angeles Water Quality Control Board (Regional Water Board)	Address: 320 W. 4 th Street Suite 200 Los Angeles, CA 90013
Agency Caseworker: David Bjostad	Case No.: R-24976

Case Information

USTCF Claim No.: 16606	GeoTracker Global ID: T0603705478
Site Name: 76 Station#5836	Site Address: 11305 Culver Blvd Culver City, CA 90066
Responsible Party 1: Conoco Phillips Company Attn: Shari London	Address: 3611 S. Harbor Blvd Suite 200 Santa Ana, CA 92704
Responsible Party 2: Chevron EMC Attn: James Kiernan	6101 Bollinger Canyon Rd., Room 5507 San Ramon, CA 94583
USTCF Expenditures to Date: \$0	Number of Years Case Open: 19

To view all public documents for this case available on GeoTracker use the following URL.
URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603705478

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 case is an active commercial petroleum fueling facility. An unauthorized release was reported in September 1994 followed by the removal of three USTs (two gasoline and one waste oil) in January 1998. Approximately 800 tons of impacted soil were removed and disposed offsite in 1998. Soil vapor extraction (SVE) was pilot tested in September 2002 reportedly removing approximately 80 pounds of hydrocarbons. Full scale SVE remediation, conducted between February 2006 and January 2011, reportedly removed an additional 11,490 pounds of hydrocarbons. Ozone injection of groundwater was conducted from February to June 2009, followed by air injection from June 2009 to January 2011. Active remediation has not been conducted at the Site for the past five years. Since 1999, nineteen groundwater monitoring wells have been installed and regularly monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except for benzene and tertiary butyl alcohol.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no supply wells or surface water bodies within 250 feet of the defined plume boundary. No other water supply wells have been identified within 250 feet of the defined 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 impacted 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 this criteria because the Tertiary Butyl Alcohol (TBA) plume is not stable or decreasing. TBA concentrations continue to remain elevated and fluctuate with time.
- Vapor Intrusion to Indoor Air: The case meets the Policy Exclusion for Active Station. 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

The Regional Water Board objects to UST case closure (May 2, 2013 letter) because:

- The TBA plume is not stable or decreasing.

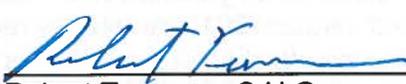
RESPONSE: The Fund concurs.

Recommendation

The Fund recommends that the Regional Board direct the Responsible Party to institute focused groundwater remediation to reduce or stabilize dissolved TBA levels.



Ramesh Sundareswaran Date
Water Resource Control Engineer
Technical Review Unit
(916) 341-5670



Robert Trommer, C.H.G. Date
Senior Engineering Geologist
Chief, Technical Review Unit
(916) 341-5684