



State Water Resources Control Board

**REVISED DRAFT
REVIEW SUMMARY REPORT – ADDITIONAL WORK
PRELIMINARY REVIEW – NOVEMBER 2014**

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Water Board)	Address: 320 West 4 th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: David Bjostad	Case No.: 900270134

Case Information

USTCF Claim No.: 15178	GeoTracker Global ID: T0603700743
Site Name: Arco #5025	Site Address: 1630 Vermont Ave. N. Los Feliz, CA 90027
Responsible Party: BP Products North America, Inc., Assignee Attn: Chris Winsor	Address: 6 Centerpointe Drive La Palma, CA 90623
USTCF Expenditures to Date: \$0	Number of Years Case Open: 25

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=T0603700743

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 August 1989 following the removal of three gasoline USTs. Between 1989 and 2001, approximately 700 tons of impacted soil was excavated during UST and product piping removal. A 63-hour dual phase extraction pilot test was completed in July 2003 and reportedly removed 4,156 gallons of impacted groundwater. Reportedly, 163 gallons of impacted water were removed during quarterly free product hand bailing events. An air sparge/soil vapor extraction pilot test was completed in March 2011, which removed 113 pounds of gasoline, 0.31 pounds of benzene, and 0.02 pounds of methyl tert-butyl ether (MTBE). Active remediation has not been conducted at the Site for the past three years. Since 1990, ten groundwater monitoring wells have been installed and regularly monitored. According to groundwater data, water quality objectives have not been achieved for all constituents.

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 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 Policy criteria because the contaminant plume is greater than 250 feet and benzene concentrations remain elevated. Also, the contaminant plume is not fully defined to the east - southeast.
- Vapor Intrusion to Indoor Air: The on-Site property associated with 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. The off-site properties associated with the case meets the Policy Criterion 2a by Scenario 3b. The maximum benzene concentration in groundwater is less than 1,000 µg/L. The minimum depth to groundwater is greater than 10 feet, overlain by soil containing less than 100 mg/kg of TPH.
- 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 (July 24, 2014 telephone call) because:

- The TBA and benzene plumes require further off-site delineation.

RESPONSE: We concur.

Recommendation

The Fund recommends further plume delineation to the east - southeast.

 11-13-14

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 11/13/14

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