State Water Resources Control Board

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 4th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Daniel Pirotton	Case No.: 900360052

Case Information

USTCF Claim No.: 4877	GeoTracker Global ID: T0603700886
Site Name: Chevron #9-0726	Site Address: 7020 Beverly Boulevard Los Angeles, CA 90036
Responsible Party: Shelby Lathrop Chevron Environmental Management Company	Address: 6101 Bollinger Canyon Road San Ramon, CA 94583
USTCF Expenditures to Date: $0	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=T0603700886

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 April 1990 following the removal of four USTs (three fuel and one waste oil). Unspecified amount of soil was excavated during UST removal and replacement activities in 1989. One 24-hour and two 5-day high vacuum multi-phase extraction events (MPE) were conducted in 2002 and 2003. 9,360 pounds of petroleum hydrocarbon vapors and 45,200 gallons of groundwater were removed. In 2007, a 72-hour MPE event was conducted and removed 368 pounds of petroleum hydrocarbon vapor. A soil vapor extraction system was operated periodically between April 2010 and August 2012, for a total of 517 days, and reportedly removed approximately 9,483 pounds of TPHg. Active remediation has not been conducted at the Site for the past two years. Since 1990, sixteen groundwater monitoring wells have been installed and regularly monitored.

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 defined plume boundary. No other water supply wells have been identified within 1,000 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 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 seven of the eight Policy general criteria (free product has not been removed to the maximum extent practicable).
- Groundwater Specific Criteria: The case does not meet Policy Criteria. The benzene plume that exceeds water quality objectives is not stable or decreasing.
- 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 (September 17, 2014 letter) because:

- Free product present in off-site MW-6 has not been removed to the maximum extent practicable.
  RESPONSE: We concur.

Recommendation

The Fund recommends that the Regional Water Board direct the Responsible Party to:

- Monitor and remove free product as necessary in MW-6.
- Define the benzene in the downgradient direction.
- Continue groundwater monitoring to demonstrate plume stability.

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