

State Water Resources Control Board

FUND REVIEW SUMMARY REPORT – CONCUR FOURTH REVIEW – OCTOBER 2016

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: Maryam Taidy	Case No.: 900170116

Case Information

USTCF Claim No.: 4514	GeoTracker Global ID: T0603700591
Site Name: Shell #204-4532-0102	Site Address: 1551 West 7 th (Site) Los Angeles, CA 90017
Responsible Party: Equilon Enterprises, LLC C/O Shell Oil Products US- HSE-S&E Attn: Deborah Pryor	Address: 20945 South Wilmington Avenue Carson, CA 90810
USTCF Expenditures to Date: \$1,282,203	Number of Years Case Open: 27

To view all public documents for this case available on GeoTracker us the following URL:
http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603700591

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. However, concentrations of tert-butyl alcohol (TBA) in two onsite monitoring wells have exceeded 15,000 parts per billion (ppb) within the past twelve months. It is unknown if TBA will cause the contaminant plume to become unstable. Highlights of the case follow:

This case is a former commercial petroleum fueling facility that is currently developed as a retail shopping center. An unauthorized release was reported in May 1989 following a site assessment and the removal of a 550 gallon waste oil tank in 1987. Four gasoline USTs were removed in 1990 and 2 additional gasoline USTs were removed in 2002. Approximately 890 tons of impacted soil were excavated and disposed of offsite in 2002. Approximately 30 gallons of free product were removed between July 1994 and May 2003. Soil vapor extraction (SVE) was conducted from November 2004 until December 2005 followed by dual phase extraction (DPE) from May 2008 through May 2012. Together SVE and DPE activities have removed approximately 269,381 pounds of total petroleum hydrocarbons (TPH) and 14,023 gallons of contaminated groundwater. Remediation has not been conducted at the site for the past 4 years. Since 1991, 15 groundwater monitoring wells have been installed and monitored and 19 remediation wells have been installed. Twenty one of these wells have been destroyed. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except for the immediate source area.

The petroleum release is limited to the soil and shallow groundwater. According to data available on GeoTracker, there are no public supply wells or surface water bodies within 1,000 feet of the projected plume boundary. No other water supply wells or surface water bodies have been identified within 1,000 feet of the projected plume boundary. According to GeoTracker there are no nearby or impacted wells. 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 of the eight Policy general criteria. This is based on the projection of the plume boundary above water quality objectives to extend no farther than 250 feet beyond MW-14.
- **Groundwater Specific Criteria:** The case meets the Policy criteria for groundwater by Class 4. The benzene and MTBE plumes above water quality objectives are less than 1,000 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 projected plume boundary, and the dissolved benzene and MTBE concentrations are less than 1,000 micrograms per liter ($\mu\text{g/L}$).
- **Vapor Intrusion to Indoor Air:** The case meets Policy Criterion 2a by Scenario 3b. The maximum benzene concentration in groundwater is less than 1,000 $\mu\text{g/L}$. The minimum depth to groundwater is greater than 10 feet, overlain by soil containing less than 100 milligrams per kilogram (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.

Outcome of Conference Call

During a teleconference on October 24, 2016 between Regional Water Board staff and State Water Board staff, it was agreed that the Remedial Action Plan Addendum (RAP) proposing two batch groundwater extraction events should be implemented for the purposes of reducing dissolved concentrations of TBA in the source area.

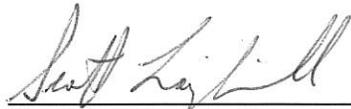
Recommendation

State Water Board Staff concur with implementation of the RAP intended to reduce dissolved concentrations of TBA in the source area along with two semiannual groundwater monitoring events. The volume of groundwater pumped during the extraction events should be recorded and groundwater samples should be collected from the pumping wells midway through each extraction.

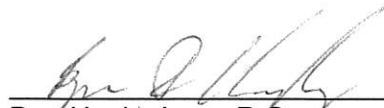
Shell #204-4532-0102
1551 West 7th Street, Los Angeles
Claim No: 4514

October 2016

The case should be reevaluated for closure following the submittal of semi-annual groundwater monitoring report due on July 15, 2017.

 10/25/16

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 10/25/16

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