

State Water Resources Control Board

August 30, 2016

COC Real Estate II, LLC
c/o Sah Enterprises
205 Hill Street
Santa Monica, CA 90405

Dear Sir or Madam:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,
COMMERCIAL PARKING LOT, 3016 MAIN STREET, SANTA MONICA,
LOS ANGELES COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T10000008335
- Los Angeles Regional Water Quality Control Board (Los Angeles Water Board), Case No. 904050252

State Water Board staff reviewed the closure request dated May 4, 2016, and the response from the Los Angeles Water Board dated June 24, 2016. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Los Angeles Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criteria:

- **General Criterion b.** – The unauthorized release consists only of petroleum.
- **General Criterion e.** – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.
- **Groundwater Media-Specific Criteria**

The unauthorized release consists of lead. Groundwater grab samples indicate elevated lead concentrations in groundwater of up to 160 micrograms per liter ($\mu\text{g/L}$), approximately one order of magnitude above the water quality objective of 15 $\mu\text{g/L}$. The turbidity of these groundwater grab samples is not known. Additional samples from groundwater monitoring wells are necessary to determine the mobility of lead between soil and groundwater and the areal extent of lead in

groundwater. Groundwater Media-Specific Criteria are not met because the plume length is unknown. Also unknown is if the plume is stable or decreasing in areal extent.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact George Lockwood at (916) 341-5752 or George.Lockwood@waterboards.ca.gov.

Sincerely,



Karen Larsen, Deputy Director
Division of Water Quality

cc: [Via email only]

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