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## State Water Resources Control Board

December 17, 2014

Ms. Deborah Pryor  
Shell Oil Products US  
20945 South Wilmington Avenue  
Carson, CA 90810

Dear Ms. Pryor:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, ARGO REALTY PROPERTY, 1661 LINCOLN BOULEVARD, 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 site has the following identification numbers:

- GeoTracker No. T0603701383
- Los Angeles Regional Water Quality Control Board (Los Angeles Water Board)

The State Water Board reviewed the closure request dated February 25, 2014 and response from the Los Angeles Water Board. After careful consideration of the GeoTracker record, Water Board staff agrees with the Los Angeles Water Board staff determination that all of the General and Media-Specific Criteria have not been met. Based on information in the above-referenced case file, this agency finds that this site does not meet the following General and Media-Specific Criteria:

- General Criteria e – A conceptual site model that assesses the nature, extent and mobility of the release has been developed; and
- Groundwater Media-Specific Criteria Class (4) d – The dissolved concentration of benzene is less than 1,000 micrograms per liter ( $\mu\text{g/l}$ ).

There is a significant amount of benzene, total xylenes, and ethylbenzene in groundwater beneath the site. The extent and mobility of benzene, total xylenes, and ethylbenzene in groundwater, downgradient of offsite well MW-13, have not been delineated. Between 2005 and 2013, concentrations of benzene in onsite well ARMW-7 ranged between 2,260  $\mu\text{g/l}$  and 1,200  $\mu\text{g/l}$ . The concentration of benzene exceeds the value shown in Groundwater Media-Specific Criteria Class (4) d in the Policy.

Petroleum constituents in groundwater continue to pose a threat to human health, safety and the environment. Criteria for low-threat UST case closure have not been met at this time, and therefore, closure of the UST case is not appropriate.

If you have any questions, please contact Mr. Benjamin Heningburg at (916) 341-5749 or [Benjamin.Heningburg@waterboards.ca.gov](mailto:Benjamin.Heningburg@waterboards.ca.gov)

Sincerely,



Victoria A. Whitney, Deputy Director  
Division of Water Quality

cc: [Via email only]

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