

State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK SECOND REVIEW – AUGUST 2015

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Water Board)	Address: 320 West 4 th Street, Suite 400 Los Angeles, CA 90013
Agency Caseworker: Maryam Taidy	Case No.: 900330407

Case Information

USTCF Claim No.: 14609	GeoTracker Global ID: T06703783818
Site Name: Al Sal Oil #25	Site Address: 1800 4 th Street Los Angeles, CA 90033
Responsible Party: Al Sal Oil Company Attn: Jeff Anenberg	Address: 6465 Wilshire Boulevard, #300 Beverly Hills, CA 90212
USTCF Expenditures to Date: \$256,800	Number of Years Case Open: 16

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=T0603783818

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 January 1999 following the removal of three gasoline USTs, one bunker oil UST, and approximately 2,284 of contaminated soil in March 1998. No other active remediation has been conducted. Since 2007, 14 groundwater monitoring and eight remediation wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved except in the source area.

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 250 feet of the defined plume boundary. No other water supply wells have been identified within 250 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 all eight Policy general criteria.
- Groundwater Specific Criteria: The case does not meet Policy criteria because concentrations of TBA are increasing in the source area and the groundwater plume may not be stable.
- Vapor Intrusion to Indoor Air: This active fueling facility meets the Active Commercial Petroleum Fueling Facility Exception. Exposure to petroleum vapors associated with historical fuel system releases is comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities.
- 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.

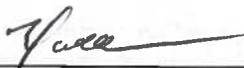
Objections to Closure and Responses

According to the LTCP Checklist page in GeoTracker dated July 3, 2015, Regional Water Board staff objects to UST case closure because:

- Inadequate conceptual site model.
RESPONSE: Adequate data is available in GeoTracker to develop a conceptual site model as defined by the Policy.

Recommendation

In a letter dated June 4, 2015, Regional Water Board staff directed the responsible party to conduct remediation of source area well MW-1B to reduce the TBA concentration. We agree focused remediation is warranted to reduce the groundwater plume in the source area.



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