REVISED
REVIEW SUMMARY REPORT - CONCUR
THIRD REVIEW - NOVEMBER 2015

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Water Board)	Address: 3204 W. 4th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Daniel Pirotton	Case No.: 900160098

Case Information

USTCF Claim No.: 3726	GeoTracker Global ID: T0603700559
Site Name: Aramark Magazine & Book	Site Address: 2340 Fairfax Avenue South Los Angeles, CA 90016
Responsible Party: ARAMARK Corporation Attn: Allan Fernandes	Address: 1717 Arch Street, 43rd Floor, Philadelphia, PA 19103
USTCF Expenditures to Date: $1,490,000	Number of Years Case Open: 28

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=T060370059

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. Highlights of the case follow:

This case involves a warehouse. An unauthorized release was reported in April 1987 followed by the removal of two USTs; one in 1987 and the other in 1998. An unknown amount of impacted soil was reportedly removed and disposed offsite during the removal of the USTs. Dual phase extraction was conducted between July 2010 and July 2014, which reportedly removed 13,734 gallons of total petroleum hydrocarbons as gasoline (TPHg). Since 1987, 20 groundwater monitoring wells have been installed and regularly monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents. There appears to be another significant petroleum hydrocarbon plume migrating onto this property from the north (upgradient). An active UST release site is located upgradient and is suspected to be the source of the petroleum hydrocarbon in the west portion of the Site.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no supply wells or other water supply wells within 1,000 feet of the Site. Ballona Creek, a concrete lined channel, is approximately 325 feet to the northwest (upgradient) of the Site. The unauthorized release is located in an area of public water service, 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. Remaining petroleum hydrocarbon

constituents are limited and stable, and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary. State Water Board staff believes the benzene concentrations identified in monitoring wells MW-5, MW-11, MW-17 and SW-3 are the result of a release associated with the active Los Angeles Water and Power (LAW&P), Palms Distribution Headquarters case (RB # 900160034).
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: This case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from potential exposure to petroleum constituents was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The onsite building is an active warehouse facility fork lifts being operated and multiple rollup doors that would prevent the accumulation of soil vapors in the building. Therefore, the pathway is incomplete. In addition, as an active warehouse facility, there would adequate air exchange provided by the building's ventilation system required to control fork lift exhaust generated during business hours.
- 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 Teleconference

A second level Conflict Resolution call was conducted on November 19, 2015 between the State Water Board staff and Regional Water Board staff after the State's 60-day public notice period had been completed. State Water Board staff believes the Site meets criteria for closure and that the contamination on the west side of the property is from an offsite source; Regional Water Board staff believes the contamination on the west side of the property is due to the release from the Aramark USTs. To allay Regional Board staff concerns regarding data gaps in the site conceptual model, State Water Board staff concurred with the Regional Board staff recommendation for additional work, specifically, preparation of a rose diagram, and preparation of east-west oriented cross sections of the Aramark Site, using existing data.

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