CALIFORNIA
Water Boards

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MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

JUN 27 2014

Ms. Janet Wager
Contracts Manager/Remediation Management/BP America, Inc.
Helios Plaza – 201 Helios Way, 6.370A
Houston, TX 77079

Dear Ms. Wager:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, FORMER ARCO STATION NO. 0166, 105 AVENUE 52 N, LOS ANGELES, CA 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. T0603701007
- Los Angeles Regional Water Quality Control Board (Regional Water Board) Case No. 900420089

The State Water Board reviewed the closure request dated September 19, 2013 and the response from the Regional Water Board in the GeoTracker record. The Regional Water Board disagrees with the proposed UST case closure because Groundwater-Specific Criteria have not been met.

After careful consideration of the GeoTracker record, I have determined 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; Groundwater-Specific Criteria (4) d – The dissolved concentration of benzene is less than 1,000 micrograms per liter (µg/L), and the dissolved concentration of methyl tertiary butyl ether (MTBE) is less than 1,000 µg/L.

The petroleum constituent plume appears to have co-mingled with the petroleum plume beneath the adjacent open UST case known as Shell #204-4531-5409 located at 5137 North Figueroa Street (Shell). Active groundwater remedial activities being conducted at Shell limit characterization of the co-mingled plumes.

There is a significant amount of petroleum in groundwater near the secondary source area. During the most recent groundwater sampling event in November 2013, the maximum benzene and MTBE concentrations in groundwater were reported at 2,000 µg/L and 1,100 µg/L, respectively.

The secondary source continues 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.

Sincerely,

Phillis Cash FOR

Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: [Via -email only]

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