

State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK PRELIMINARY REVIEW – AUGUST 2015

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Water Board)	Address: 320 West 4 th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Jimmie Woo	Case No.: I-12083A

Case Information

USTCF Claim No.: 10706	GeoTracker Global ID: T0603766494
Site Name: ARCO #6087	Site Address: 828 Silver Spur Rd. Rolling Hills Estates, CA 90274
Responsible Party: BP America, Inc. Attn: Chris Winsor	Address: 6 Centerpointe Dr La Palma, CA 90623
USTCF Expenditures to Date: \$0	Number of Years Case Open: 23

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=T0603766494

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 a former commercial petroleum fueling facility that has been redeveloped into a commercial bank. An unauthorized release was reported in February 2004 following the removal of five USTs in 2003. Previously, five USTs were excavated in 1990. Associated with the removal of the Site's UST contaminated soil was excavated in four areas of the Site to the depths of ten to 20 feet below ground surface (bgs) in 1990 and as late as 2006. A total of 2,000 yards of impacted soil was excavated from the four excavations. No other active remediation has been reported. Since 2004, 27 groundwater monitoring have been installed and monitored; 18 well have been abandoned. According to groundwater data, water quality objectives have been achieved or nearly achieved except in the eastern most portion of the Site.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells within 1,000 feet of the defined plume boundary. No other water supply wells or surface water bodies have been identified within 1,000 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 the criteria. The benzene plume is undefined in the second saturated zone in a down gradient direction beneath shallow screened dry well AMW-6.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2b. A site-specific risk assessment of potential exposure to petroleum constituents as a result of vapor intrusion "Baseline Human Health Risk Assessment", by Terrax Environmental, Inc. dated January 20, 2012, found that maximum concentrations of petroleum constituents remaining in soil and groundwater will have no significant risk of adversely affecting human health.
- 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 Closure Denial Letter, dated June 16, 2015, the Regional Water Board staff objects to UST case closure because:

Comment 1: The conceptual site model (CSM) is incomplete; the plume has not been fully defined.

Response 1: The CSM is complete as defined by the Policy. It clearly demonstrates the plume needs definition in the downgradient direction. The lack of downgradient plume definition fails the case in the Groundwater specific criterion which fail this case for closure under the Policy at this time.

Comment 2: Secondary source has NOT been removed to the extent practicable

Response 2: The USTs were removed and more than 2,000 cubic yards of contaminated soil excavated and removed from the Site. The remaining dissolved phase contamination is limited to perched water zones with limited mass. Therefore, the secondary source has been removed to the extent practicable as defined by the Policy.

Comment 3: The case does not meet Policy Groundwater criteria. The extent of groundwater contamination has not been adequately delineated downgradient of groundwater monitoring well AMW-8D.

Response 3: The State Water Board staff agrees the benzene plume is not defined in the deeper saturated zone in the downgradient direction.

Comment 4: Groundwater monitoring must continue.

Response 4: We agree with continued groundwater monitoring, however, question the technical need for quarterly sampling.

Recommendation

The State Board staff recommends the following:

- Concur with Regional Water Board directive that requires additional assessment in the area of monitoring well MW-6;
- Agree with continued groundwater monitoring, however, the technical value is questioned in requiring quarterly monitoring. State Board Resolution 2009-42 requires semiannual sampling unless conditions exist that warrant quarterly sampling; and
- An evaluation of technologies to focus remediation in areas of high benzene concentrations.



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