

**STATE WATER RESOURCES CONTROL BOARD
BOARD MEETING SESSION – DIVISION OF WATER QUALITY
APRIL 1, 2014**

ITEM 3

SUBJECT

CONSIDERATION OF A PROPOSED ORDER FOR CLOSURE OF AN UNDERGROUND STORAGE TANK CASE PURSUANT TO HEALTH AND SAFETY CODE SECTION 25296.10 AT THE SITE LOCATED AT 1517 WEST ESTHER STREET, LONG BEACH, CALIFORNIA

DISCUSSION

Underground Storage Tank (UST) site that is the subject of the draft Order:

Eagle Industries (Former), Mr. Norman Dillinger (Responsible Party), 1517 West Esther Street, Long Beach, CA

The responsible party for the above referenced site contends that corrective action performed at their site ensures the protection of human health, safety, and the environment and that case closure is appropriate. Case-specific contentions are contained in the draft Order. Based upon the case data, the State Water Resources Control Board (State Water Board) finds that corrective action performed at the UST release site referenced above ensures protection of human health, safety, and the environment and is consistent with Chapter 6.7 of Division 20 of the Health and Safety Code, implementing regulations, and applicable water quality control plans.

The draft Order directs UST case closure for the above mentioned site.

POLICY ISSUE

Should the State Water Board adopt the proposed Order directing UST case closure?

FISCAL IMPACT

None. However, there are cost savings to the UST Cleanup Fund.

REGIONAL BOARD IMPACT

Yes. Los Angeles Regional Water Quality Control Board.

STAFF RECOMMENDATION

Adopt the Order, directing UST case closure.

<p>State Water Board action on this item will assist the Water Boards in reaching Goal 6 of the Strategic Plan Update: 2008-2012. In particular, approval of this item will assist in fulfilling the Objective to enhance consistency across the Water Boards, on an ongoing basis, to ensure our processes are effective, efficient, and to promote fair and equitable application of laws, regulations, policies, and procedures.</p>

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STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
ORDER WQ 2014-XXXX-UST

**In the Matter of Underground Storage Tank Case Closure
Pursuant to Health and Safety Code Section 25296.10**

BY THE BOARD:

By this order, the State Water Resources Control Board (State Water Board) directs closure of the underground storage tank (UST) case at the site listed below, pursuant to section 25296.10 of the Health and Safety Code¹. The name of the responsible party, the site name, the site address, the Underground Storage Tank Cleanup Fund (Fund) claim number if applicable, current and former lead agencies, and case number are as follows:

Mr. Norman Dillinger (Responsible Party)

Eagle Industries (Former)

1517 West Esther Street, Long Beach, California 90813

Los Angeles Regional Water Quality Control Board, Case No. 908130634

I. STATUTORY AND PROCEDURAL BACKGROUND

Upon review of a UST case, the State Water Board may close or require closure of a UST case where an unauthorized release has occurred, if the State Water Board determines that corrective action at the site is in compliance with all of the requirements of subdivisions (a) and (b) of section 25296.10. The State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure of a UST case. Closure of a UST case is appropriate where the corrective action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with: 1) Chapter 6.7 of division 20 of the Health and Safety Code and implementing regulations; 2) Any applicable waste discharge requirements or other orders issued pursuant to division 7 of the Water Code;

¹ Unless otherwise noted, all references are to the California Health and Safety Code.

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3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

On May 1, 2012, the State Water Board adopted [Resolution No. 2012-0016](#), the Low-Threat Underground Storage Tank Case Closure Policy (Low-Threat Closure Policy or Policy). This Policy, which is a state policy for water quality control, provides standard closure criteria for petroleum UST cases. [Resolution No. 92-49](#) governs all investigations and cleanups under Water Code section 13304. If a petroleum UST case does not meet the closure criteria in the Low-Threat Closure Policy, regulatory agencies are required to consider case closure pursuant to Resolution No. 92-49.

State Water Board staff has completed a review of the UST case identified above, and recommends that the case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Summary has been prepared for the case identified above. The factors considered in determining compliance with the Low-Threat Closure Policy and State Water Board Resolution No. 92-49 are explained in the Case Closure Summary.

Low-Threat Closure Policy

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low-Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low-threat to human health, safety, and the environment and are appropriate for closure under Health and Safety Code section 25296.10.

State Water Board Resolution No. 92-49

State Water Board Resolution No. 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code, section 13304* is a state policy for water quality control and applies to UST cases. State Water Board Resolution No. 92-49 directs that water affected by an unauthorized release attain either background water quality or the best water quality that is reasonable if background water quality cannot be restored. (State Water Board Resolution No. 92-49, section III.G.) Any alternative level of water quality less stringent than background must be consistent with the maximum benefit to the people of the state, not unreasonably affect current and anticipated beneficial use of affected water, and not result in

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water quality less than that prescribed in the water quality control plan for the basin within which the site is located. (*Ibid.*) Resolution No. 92-49 does not require, however, that the requisite level of water quality be met at the time of site closure. Resolution No. 92-49 specifies compliance with cleanup goals and objectives within a reasonable time frame (*Id.* at section III.A.). Therefore, even if the requisite level of water quality has not yet been attained, a site may be closed if the level will be attained within a reasonable period.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a uniform closure letter or a letter of commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied.

II. FINDINGS

Based upon the UST Case Closure Summary prepared for this case and attached hereto, the State Water Board finds that corrective action taken to address the unauthorized release at the UST release site identified as:

Mr. Norman Dillinger (Responsible Party)

Eagle Industries (Former)

1517 West Esther Street, Long Beach, California 90813

Los Angeles Regional Water Quality Control Board, Case No. 908130634

ensure protection of human health, safety, and the environment and is consistent with chapter 6.7 of division 20 of the Health and Safety Code, and implementing regulations, and other water quality control policies and applicable water quality control plans.

Notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60 day comment period has been provided to notified parties, and any comments received have been considered by the State Water Board in determining that the case should be closed.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Board (Regional Water Board) pursuant to division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to division 7 of the Water Code, or directives issued by a Local Oversight Program (LOP) agency for the case should be rescinded to the extent they are inconsistent with this Order.

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III. ORDER

IT IS THEREFORE ORDERED that:

- A. The UST case identified in Section II of this Order be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a uniform closure letter, the responsible party is ordered to:
 - 1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;
 - 2. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and
 - 3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in Section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.

- B. The tasks in subparagraphs (1) and (2) of Paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299, subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.

- C. Within 30 days of receipt of proper documentation from the responsible party that requirements in subparagraphs (1) and (2) of Paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.

- D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to Paragraph (C), the Deputy Director of the Division of Water Quality shall issue a uniform closure letter consistent with Health and Safety Code section 25296.10,

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subdivision (g) and upload the uniform closure letter and UST Case Closure Summary to GeoTracker.

- E. Pursuant to section 25299.57, subdivision (l) (1), and except in specified circumstances, all claims for reimbursement of corrective action costs must be received by the Fund within 365 days of issuance of the uniform closure letter in order for the costs to be considered.
- F. Any Regional Water Board or LOP agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case identified in Section II is rescinded, but only to the extent the Regional Water Board order or LOP agency directive is inconsistent with this Order.

CERTIFICATION

The undersigned, Clerk to the Board, does hereby certify that the foregoing is a full, true, and correct copy of an order duly and regularly adopted at a meeting of the State Water Resources Control Board held on April 1, 2014.

AYE:

NO:

ABSENT:

ABSTAIN:

Jeanine Townsend
Clerk to the Board

State Water Resources Control Board

UST CASE CLOSURE SUMMARY (REVISED 1/23/14)

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board (Regional Board)	Address: 320 West 4 th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: David Bjostad	Case No.: 908130634

Case Information

USTCF Claim No.: not applicable	Global ID: T0603792998
Site Name: Eagle Industries (Former)	Site Address: 1517 West Esther Street Long Beach, CA 90813 (Site)
Responsible Party: Mr. Norman Dillinger	Address: Private Residence
USTCF Expenditures to Date: not applicable	Number of Years Case Open: 13

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603792998

Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Low-Threat Policy. This Case does **NOT** satisfy **GENERAL CRITERIA b** of the Policy, which requires the unauthorized release to consist only of petroleum. This Site meets all of the required criteria of the State Water Resources Control Board Resolution 92-49. A summary evaluation of compliance with the Resolution 92-49 is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model (CSM) upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Site Information**. Highlights of the CSM upon which the evaluation of the Case has been made are as follows:

The release at this Site was discovered in 2000 after a site investigation was conducted. Three underground storage tanks (USTs) existed on-Site and stored gasoline and dry-cleaning solvents. A Phase I Environmental Site Assessment, completed in 2011, indicates that an additional UST or an above ground storage tank may have also existed on the Site. One 280 gallon UST was removed from the Site in March 1973. The remaining USTs were removed from the Site between 1973 and 1998. The tank pits are reported to be filled with concrete. The Site record contains limited groundwater data, however the Site is upgradient and adjacent to a former UST site (Los Angeles Regional Water Quality Control Board [Regional Water Board] Case No. 908100143, aka Castle Car Wash) that was closed in 1998. Prior to case closure, groundwater monitoring wells installed at the Castle Car Wash provided delineation of the Site plume. The Castle Car Wash groundwater monitoring wells were located directly downgradient of the Site and exhibited decreasing trends from 1993 to case closure in 1998.

Eagle Industries (Former)
1517 West Esther Street, Long Beach

One of the grab groundwater samples collected at the Site in April 2000 contained a low concentration of cis-1,2-Dichloroethene (cis-1,2-DCE). However, this volatile organic compound (VOC) is not a risk driver at the Site for the following reasons:

- The concentration is only slightly above Water Quality Objectives (WQOs). Due to the age of the sample, it is likely that the concentration has reduced to below WQOs;
- The concentration is significantly lower than San Francisco Bay Regional Water Board Environmental Screening Levels (ESL) for Vapor Intrusion to Indoor Air from groundwater;
- This constituent is not present in the grab groundwater samples collected in 2012 south of the facility; and
- All soil data analyzed for VOCs were non-detect for cis-1,2-DCE.

VOC 1,2-dichloroethane (1,2-DCA) was also detected at low concentrations in groundwater in 2000. 1,2-DCA was used as a lead scavenger and is usually associated with petroleum releases. As such, the State Water Board staff considers the primary release at the Site to be petroleum hydrocarbons from the USTs.

The petroleum release is limited to the shallow soil and shallow groundwater. The affected groundwater is not currently being used as a source of drinking water or for any other designated beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or for any other beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals and intake screens that are in deeper more protected aquifers. Remaining petroleum constituents are limited, stable, and declining. Remedial actions have been implemented and further remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the CSM. Any remaining petroleum constituents do not pose significant risk to human health, safety or the environment under current conditions.

Objections to Closure

The Regional Water Board does not object to closure of the Site for the petroleum hydrocarbons or the residual VOCs.

Recommendation for Closure

The corrective action performed at this Site ensures the protection of human health, safety, the environment and is consistent with chapter 6.7 of the Health and Safety Code and implementing regulations, applicable state policies for water quality control and the applicable water quality control plan, and case closure is recommended.

Prepared By:  _____
Steve McMasters, P.G. No. 8054 Date
Engineering Geologist

1/23/14

Reviewed By:  _____
Benjamin Heningburg, P.G. No. 8130 Date
Senior Engineering Geologist

1/23/13

Eagle Industries (Former)
 1517 West Esther Street, Long Beach

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The Site complies with State Water Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the Site do not pose significant risk to human health, safety, or the environment.

The Site complies with the requirements of Resolution 92-49 as described below.

<p>Will corrective action performed ensure the protection of human health, safety, and the environment? The information included in this UST Case Closure Summary supports a determination that corrective action performed at this Site will ensure the protection of human health, safety, and the environment.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST case closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this Site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this Site meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this Site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Are corrective action and UST case closure consistent with State Water Board Resolution 92-49?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Is achieving background water quality feasible? To remove all traces of residual petroleum constituents at the Site would require significant effort and cost. Removal of all traces of residual petroleum hydrocarbon constituents (if present) that contribute to detectable concentrations in shallow groundwater can be accomplished, but would require excavation of additional soil as well as additional remediation of shallow groundwater. If complete removal of all detectable traces of petroleum constituents becomes the standard for UST corrective actions, the statewide technical and economic implications will be enormous. Because of the high costs involved and minimal benefit of attaining further reductions in concentrations of petroleum constituents at this Site, and the fact that beneficial uses are not threatened, attaining background water quality at this Site is not feasible.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

<p>If achieving background water quality is not feasible: Is the alternative cleanup level consistent with the maximum benefit to the people of the State?</p> <p>It is impossible to determine the precise level of water quality that will be attained given the uncertainties about the rates of dissolution and degradation. In light of all the factors discussed above and the fact that the residual petroleum constituents will not unreasonably affect present and anticipated beneficial uses of groundwater, an acceptable level of water quality will be attained that is consistent with the maximum benefit to the people of the state.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Will the alternative cleanup level unreasonably affect present and anticipated beneficial uses of water?</p> <p>The aquifer beneath the Site will reach WQOs within a reasonable period of time and the surrounding aquifer is below WQOs. Groundwater concentrations will continue to reduce through natural attenuation.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Will the alternative level of water quality result in water quality less than that prescribed in applicable Basin Plan?</p> <p>The final step in determining whether cleanup to a level of water quality less stringent than background is appropriate for this Site requires a determination that the alternative level of water quality will not result in water quality less than that prescribed in the relevant basin plan. Pursuant to State Water Board Resolution 92-49, a site may be closed if the basin plan requirements will be met within a reasonable time frame. Natural attenuation will continue to reduce groundwater concentrations.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Have factors contained in title 23 of the California Code of Regulations, section 2550.4 been considered?</p> <p>In approving an alternative level of water quality less stringent than background, the State Water Board considers the factors contained in California Code of Regulations, title 23, section 2550.4, subdivision (d).</p> <p>The adverse effect on shallow groundwater will be minimal and localized, and there will be little adverse effect on the groundwater contained in deeper aquifers, given the physical and chemical characteristics of petroleum constituents, the hydrogeological characteristics of the Site and surrounding land. In addition, the potential for adverse effects on beneficial uses of groundwater is low, in light of the proximity of the groundwater supply wells, the current and potential future uses of groundwater in the area, the existing quality of groundwater, the potential for health risks caused by human exposure, the potential damage to wildlife, crops, vegetation, and physical structures, and the persistence and permanence of potential effects.</p> <p>Finally, a level of water quality less stringent than background is unlikely to have any impact on surface water quality, in light of the volume and physical and chemical characteristics of petroleum constituents; the hydrogeological characteristics of the Site and surrounding land; the quantity and quality of groundwater and direction of groundwater flow, the patterns of precipitation in the region, and the proximity of residual petroleum to surface waters.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

Eagle Industries (Former)
1517 West Esther Street, Long Beach

<p>Will the requisite level of water quality be met within a reasonable time? Although WQOs may not have been met at the Site, the approximate time period in which the requisite level of water quality will be met for constituents of concern is decades to hundreds of years. This is a reasonable period in which to meet the requisite level of water quality because current and future beneficial uses are not impaired. Impacted groundwater is not currently being used as a source of drinking water and it is highly unlikely that impacted groundwater will be used as a source of drinking water in the future. Residential and commercial water users are currently connected to the municipal drinking water supply. Public supply wells are constructed with competent sanitary seals and intake screens that are in deeper more protected aquifers. The site conditions do not represent a substantial threat to human health, safety, or the environment, and case closure is appropriate.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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ATTACHMENT 2: SUMMARY OF BASIC INFORMATION (Conceptual Site Model)

Site Location/ History

- Location: The Site is located approximately 100 feet west of the intersection of Caspian Avenue and West Esther Street in Long Beach, California. The Site is currently used as an artist’s studio and small engine repair and storage. The Site was formally used as a dry cleaning facility, a fiberglass boat manufacturing facility, and an industrial tube cleaning facility. The USTs were removed prior to the current use of the Site.
- The Site is bounded by commercial businesses to the west, east, north, and south.
- Nature of Contaminants of Concern: Petroleum constituents and chlorinated solvents.
- Primary Source of Release: UST system.
- Discovery Date: 2000.
- Release Type: Petroleum¹; potential minor chlorinated solvents.
- Free Product: Not reported.

Table A: USTs

Tank	Size in Gallons	Contents	Status	Date
1 UST	1,000	Gasoline or Solvent	Removed	1973 to 1998
1 UST	550	Gasoline or Solvent	Removed	1973 to 1998
1 UST	280	Gasoline or Solvent	Removed	1973 to 1998
1 UST	280	Gasoline or Solvent	Removed	1973

Receptors

- Groundwater Basin: Coastal Plain of Los Angeles Groundwater Basin (West Coast subbasin).
- Groundwater Beneficial Uses: Municipal and domestic supply (MUN), agricultural supply (AGR), industrial supply (IND), and industrial process supply (PRO).
- Designated Land Use: Commercial.
- Public Water System: City of Long Beach.
- Distance to Nearest Supply Wells: No supply wells exist within 1,000 feet of the Site.
- Distance to Nearest Surface Waters: Los Angeles River is located greater than 1,000 feet to the east.

Geology/ Hydrogeology

- Average Groundwater Depth: ~ 14 to 25 feet bgs.
- Minimum Groundwater Depth: ~ 14 feet.
- Geology: The Site overlies alluvial deposits consisting primarily of sand, silty sand, and silt from surface to between 18 and 25 feet bgs. Silty clay underlies the sand and silty sand deposits to a maximum depth explored of 35 feet bgs.
- Hydrogeology: Groundwater beneath the Site is unconfined between 25 and 30 feet bgs. Perched groundwater may also exist at the Site at approximately 14 feet bgs. Groundwater flows to the southeast.

¹ "Petroleum" means crude oil, or any fraction thereof, which is liquid at standard conditions of temperature and pressure, which means at 60 degrees Fahrenheit and 14.7 pounds per square inch absolute. (Health & Safety Code, § 25299.2)

Corrective Actions

- Three to four USTs removed from the Site between 1973 and 1998. Tank pits were reported to be back filled with concrete.

Table B: Concentrations of Petroleum Constituents in Soil

Sample ID	Date	Depth (ft)	TPHd (mg/kg)	TPHg (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	MTBE (mg/kg)
Screening Levels									
LA Region 4 Screening Levels			100	100	0.011	0.45	2.0	5.3	0.013
Policy (Direct Contact) (0 to 5')					1.9		21		
Policy (Direct Contact) (5 to 10')					2.8		32		
Soil Sample Results									
GB1-5'	4/10/2000	5	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
GB1-10'	4/10/2000	10	<1.0	<1.0	0.035	<0.005	0.0081	0.017	<5.0
GB1-15'	4/10/2000	15	<1.0	60	0.124	0.158	0.856	0.866	<5.0
GB1-20'	4/10/2000	20	<1.0	830	5.23	27.9	9.5	55	<5.0
GB1-25'	4/10/2000	25	<1.0	18	0.811	0.466	0.205	0.693	<5.0
GB1-30'	4/10/2000	30	<1.0	<1.0	0.196	0.093	0.038	0.124	<5.0
GB2-5'	4/10/2000	5	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
GB2-10'	4/10/2000	10	<1.0	237	0.523	2.04	1.39	6.07	<5.0
GB2-15'	4/10/2000	15	<1.0	525	5.6	13.1	5.07	26.4	<5.0
GB2-20'	4/10/2000	20	<1.0	18	0.294	0.0363	0.175	0.616	<5.0
GB2-25'	4/10/2000	25	<1.0	<1.0	0.098	<0.005	0.0069	0.0161	<5.0
GB2-30'	4/10/2000	30	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
GB2-35'	4/10/2000	35	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
GB3-5'	4/10/2000	5	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
GB3-10'	4/10/2000	10	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
GB3-15'	4/10/2000	15	<1.0	16	0.334	0.0577	0.101	1.05	<5.0
GB3-20'	4/10/2000	20	<1.0	35	0.712	0.162	0.35	1.71	<5.0
GB3-25'	4/10/2000	25	<1.0	<1.0	0.24	<0.005	0.029	0.016	<5.0
GB3-30'	4/10/2000	30	<1.0	<1.0	<0.005	<0.005	<0.005	<0.015	<5.0
E11-S1	6/13/2012	13	<15	14	<0.0016	0.00054	<0.0016	<0.0031	<0.0023
E11-S2	6/13/2012	19	<15	8.2	1.9	0.25	0.39	0.68	<0.083
E12-S1	6/13/2012	11	<5.0	<0.29	<0.0015	<0.0015	<0.0015	<0.003	<0.0022
E12-S2	6/13/2012	19	<15	190	3.2	5.3	5.9	22.8	<0.0022
E13-S1	6/13/2012	13	<5.0	0.64	<0.0015	<0.0015	<0.0015	<0.0029	<0.0022
E13-S2	6/13/2012	18	<15	27	0.074	<0.079	2.0	3.57	<0.079
E14-S1	6/14/2012	6	<5.0	<0.31	<0.0016	<0.0016	<0.0016	<0.0032	<0.0024
E14-S2	6/14/2012	9	<5.0	<0.27	<0.0014	<0.0014	<0.0016	<0.0028	<0.0021
E14-S3	6/14/2012	13	<5.0	<0.29	<0.0015	<0.0015	<0.0015	<0.0029	<0.0022
E15-S1	6/14/2012	3	<5.0	<0.33	<0.0015	<0.0015	<0.0015	<0.003	<0.0023
E15-S2	6/14/2012	7	<5.0	<0.28	<0.0014	<0.0014	<0.0014	<0.0028	<0.0021
E15-S3	6/14/2012	11	<5.0	<0.29	<0.0016	<0.0016	<0.0016	<0.0031	<0.0023

Notes:

TPHd - total petroleum hydrocarbons as diesel

TPHg - total petroleum hydrocarbons as gasoline

TPH - total petroleum hydrocarbons

Xylenes - total xylenes

MTBE - methyl tert-butyl ether

mg/kg - milligrams per kilogram

bold - indicates result exceeds LA Region 4 Screening Levels

<' - identifies result is below laboratory reporting limit

LA Region 4 Screening Levels - Los Angeles Regional Water Quality Control Board UST Closure Criteria, dated 2006.

(Silt Soil & GW <20 feet)

Policy - State Water Resources Control Board Low-Threat Underground Storage Tank Case Closure Policy

(Resolution No. 2012-0016)

Table C. Concentrations of Selected Volatile Organic Compounds in Soil

Sample ID	Date	Depth (ft)	Isopropylbenzene (mg/kg)	Napthalene (mg/kg)	1,2-Dichloroethane (mg/kg)	cis-1,2-Dichloroethene (mg/kg)	N-Propylbenzene (mg/kg)	1,2,4-Trimethylbenzene (mg/kg)	1,3,5-Trimethylbenzene (mg/kg)
Screening Levels									
LA Region 4 Screening Levels			--	3.6	0.0045 ¹	0.19 ¹	3,400	62	780
Policy (Direct Contact) (0 to 5')				9.7					
Policy (Direct Contact) (5 to 10')				9.7					
Soil Sample Results									
GB1-5'	4/10/2000	5	--	--	--	--	--	--	--
GB1-10'	4/10/2000	10	--	--	--	--	--	--	--
GB1-15'	4/10/2000	15	--	--	--	--	--	--	--
GB1-20'	4/10/2000	20	<0.005	2.22	<0.05	<0.05	27.1	31.5	9.75
GB1-25'	4/10/2000	25	--	--	--	--	--	--	--
GB1-30'	4/10/2000	30	--	--	--	--	--	--	--
GB2-5'	4/10/2000	5	--	--	--	--	--	--	--
GB2-10'	4/10/2000	10	--	--	--	--	--	--	--
GB2-15'	4/10/2000	15	<0.005	0.824	<0.05	<0.05	6.5	11.6	3.78
GB2-20'	4/10/2000	20	--	--	--	--	--	--	--
GB2-25'	4/10/2000	25	--	--	--	--	--	--	--
GB2-30'	4/10/2000	30	--	--	--	--	--	--	--
GB2-35'	4/10/2000	35	--	--	--	--	--	--	--
GB3-5'	4/10/2000	5	--	--	--	--	--	--	--
GB3-10'	4/10/2000	10	--	--	--	--	--	--	--
GB3-15'	4/10/2000	15	--	--	--	--	--	--	--
GB3-20'	4/10/2000	20	--	--	--	--	--	--	--
GB3-25'	4/10/2000	25	--	--	--	--	--	--	--
GB3-30'	4/10/2000	30	--	--	--	--	--	--	--
E11-S1	6/13/2012	13	0.0028	0.0098	<0.0016	<0.0016	0.016	<0.0039	<0.0016
E11-S2	6/13/2012	19	0.035	0.14	<0.083	<0.083	0.13	0.41	0.094
E12-S1	6/13/2012	11	0.0012	<0.0037	<0.0015	<0.0015	<0.0015	<0.0037	<0.0015
E12-S2	6/13/2012	19	0.4	0.8	<0.083	<0.083	1.8	13	4.0
E13-S1	6/13/2012	13	0.0011	<0.0037	<0.0015	<0.0015	<0.0015	<0.0037	<0.0015
E13-S2	6/13/2012	18	0.13	0.67	<0.079	<0.079	0.51	4.3	0.98
E14-S1	6/14/2012	6	<0.0016	<0.004	<0.0016	<0.0016	<0.0016	<0.004	<0.0016
E14-S2	6/14/2012	9	<0.0014	<0.0034	<0.0014	<0.0014	<0.0014	<0.0034	<0.0014
E14-S3	6/14/2012	13	<0.0015	<0.0037	<0.0015	<0.0015	<0.0015	<0.0037	<0.0015
E15-S1	6/14/2012	3	<0.0015	<0.004	<0.0015	<0.0015	<0.0015	<0.0038	<0.0015
E15-S2	6/14/2012	7	<0.0014	<0.0035	<0.0014	<0.0014	<0.0014	<0.0035	<0.0014
E15-S3	6/14/2012	11	<0.0016	<0.0039	<0.002	<0.002	<0.0016	<0.0039	<0.0016

Notes:

mg/kg - milligrams per kilogram

<' - identifies result is below laboratory reporting limit

--' not analyzed

bold - identifies result is above LA Region 4 Screening Levels

LA Region 4 Screening Levels - Los Angeles Regional Water Quality Control Board UST Closure Criteria, dated 2006. (Silt Soil & GW <20 feet)

1 - San Francisco Bay Regional Water Quality Control Board Environmental Screening Level for soil.

Policy - State Water Resources Control Board Low-Threat Underground Storage Tank Case Closure Policy (Resolution No. 2012-0016)

Table D. Concentrations of Constituents in Groundwater

Sample ID	Date	DTW ¹ (ft)	TPHd (µg/L)	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	1,2-Dichloroethane (µg/L)	cis-1,2-DCE (µg/L)	Naphthalene (µg/L)	1,2,4-TMB (µg/L)	1,3,5-TMB (µg/L)
Groundwater grab sample results														
GB1-GW	4/10/2000	27 (15)	<200	58,000	19,400	6,760	1,330	5,510	<1.0	57	<0.4	170	1,150	370
GB2-GW	4/10/2000	27 (10)	<200	8,800	4,000	<0.8	241	<1.0	<1.0	14	14	<1.4	<0.9	<0.7
GB3-GW	4/10/2000	25 (15)	<200	17,300	2,030	47	335	128	<1.0	--	--	--	--	--
EI4-GW	6/14/2012	14	96	200	<0.50	<0.50	<0.50	<2.0	<0.50	<2.0	<2.0	<5.0	<2.0	<2.0
EI5-GW	6/14/2012	14	<470	<50	<0.50	<0.50	<0.50	<2.0	<5.0	<2.0	<2.0	<5.0	<5.0	<2.0
WQO			--	--	1.0	150	300	1,750	13.0	0.5	6.0	0.14	330[*]	330[*]

Castle Car Wash Groundwater Sample Results (Adjacent Property)

Well ID	Date ²	DTW (ft)	TPHd (µg/L)	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)
MW-1 (B4)	Dec-1993	--	--	7,840	620	210	<50	680	--
	Oct-1996	--	--	13,000	1,700	1,200	240	640	130
	Jan-1998	31.0	--	740	45.1	ND	ND	ND	ND
MW-2 (B2)	Dec-1993	--	--	5,670	400	1,090	<50	570	--
	Oct-1996	--	--	400	76	1.1	2.6	0.6	5.2
	Jan-1998	30.9	--	350	22.1	ND	ND	ND	ND
MW-3 (B3)	Dec-1993	--	--	32,670	3,050	5,460	<50	6,070	--
	Oct-1996	--	--	1,400	82	4.2	4.5	3.7	9.9
	1/29/1998	29.7	--	1,050	228	ND	ND	ND	ND
MW-4 (B1)	Dec-1993	--	--	11,330	410	800	<50	630	--
	Oct-1996	--	--	1,400	200	15	5.3	7.5	11
	Jan-1998	30.8	--	220	38.5	ND	ND	ND	ND
WQO			--	--	1.0	150	300	1,750	13.0

Notes:

DTW - depth to water	<' - identifies result is below laboratory reporting limit
TPHd - total petroleum hydrocarbons as diesel	ND - sample result reported as non-detect; laboratory reporting limit unknown
TPHg - total petroleum hydrocarbons as gasoline	bold - identifies that result exceeds WQO
Xylenes - total xylenes	1 - DTW for GB1 through GB3 show first water (15) in addition to static water level observed during drilling
MTBE - methyl tert-butyl ether	WQO - Water Quality Objective - Los Angeles Regional Water Quality Control Board.
DCE - dichloroethane	2 - exact sampling date unknown
TMB - Trimethylbenzene	Only selected volatile organic compounds that exceed WQO are shown.
µg/L - micrograms per liter	* - Department of Public Health Notification Level
'--' - not available/not analyzed	ft - feet

Groundwater Trends

Table D above shows groundwater concentrations for both the Site and for the adjacent off-site Castle Car Wash facility. Groundwater data is limited for the Site; however, groundwater concentration trends for the Site's plume can be inferred with the Castle Car Wash data. Table D show decreasing concentrations for all groundwater monitoring wells located at the Castle Car Wash facility.

Evaluation of Risk Criteria

- Maximum Petroleum Constituent Plume Length above WQOs: The groundwater plume is less than 250 feet in length.
- Petroleum Constituent Plume Determined Stable or Decreasing: Yes
- Soil/Groundwater Sampled for MTBE: Yes, see Table D above
- Residual Petroleum Constituents Pose Significant Risk to the Environment: No
- Residual Petroleum Constituents Pose Significant Vapor Intrusion Risk to Human Health: No – Petroleum constituents most likely to pose a threat for vapor intrusion were removed during tank removal. Recent petroleum constituent concentrations in soil are significantly lower than 2000 samples. Additionally, petroleum constituents in the upper ten feet of soil are minimal to non-detect. Shallow groundwater appears to be approximately 25 to 30 feet bgs, thus volatiles in groundwater will have little chance to get to surface through the large bioattenuation

zone. Site conditions demonstrate that the residual petroleum constituents in soil and groundwater are protective of human health.

- Residual Petroleum Constituents Pose a Nuisance² at the Site: No
- Residual Petroleum Constituents in Soil Pose Significant Risk of Adversely Affecting Human Health: No – The shallow soil has minimal residual contamination.
- Residual Petroleum Constituents Pose Significant Direct Contact and Outdoor Air Exposure to Human Health: No – Petroleum constituents appear to be only present between 15 and 25 feet bgs and concentrations for recent samples are below the Commercial/Industrial limits provided in Table 1 of the Policy. There are limited soil samples 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% benzene and 0.25% naphthalene. Therefore, benzene concentrations 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 Table 1 of the Policy. Therefore, estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact with a safety factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.
- Residual Chlorinated Solvents in Soil Pose Significant Direct Contact and Outdoor Air Exposure to Human Health: No – Soil data does not indicate chlorinated solvent constituents in soil at concentration that may indicate a health concern.
- Chlorinated Solvents in Groundwater Pose Risk to Human Health: No – Only one grab groundwater sample contained cis-1,2-DCE at a concentration that slightly exceeded WQOs. This sample was collected in 2000; it is likely this concentration has reduced through natural attenuation at the Site.
- Chlorinated Solvents Pose Significant Vapor Intrusion Risk to Human Health: No – The concentration of cis-1,2-DCE is two orders of magnitude lower than San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels for Vapor Intrusion to Indoor Air from groundwater and soil.

² Nuisance as defined in California Water Code, section 13050, subdivision (m).

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