

WB-USTClosuresComments

From: Bjostad, Dave@Waterboards
Sent: Tuesday, February 04, 2014 6:26 PM
To: WB-USTClosuresComments
Subject: RE: Comment Letter - Mobil #18-LDL Company Case Closure Summary
Attachments: 4830 Las Virgenes UST case GW flow direction concerns (rev 2-4-14).ppt

I revised the Powerpoint slide I previously sent, with revised text in green, to clarify a few items on this busy page

From: Bjostad, Dave@Waterboards
Sent: Friday, January 17, 2014 11:23 AM
To: WB-USTClosuresComments
Subject: FW: Comment Letter - Mobil #18-LDL Company Case Closure Summary

e-mail to: USTClosuresComments@waterboards.ca.gov

To:
Mr. Andrew Cooper
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814

The Regional Water Quality Control Board – Los Angeles Region would like to provide the following comments on the proposed UST case closure by the State Water Resources Control Board for case no. I-00880 at 4830 Las Virgenes Road (USTCF no. 5499) in Calabasas:

- The groundwater flow direction reported by the Responsible Party is toward the northwest, which is different than the groundwater flow direction reported at two UST cases located directly across the street from the Mobil station:
 - Southeast groundwater flow direction consistently reported at the Malibu Canyon Shell (Former ARCO) station at 4831 Las Virgenes Road
 - Southwest groundwater flow direction consistently reported at the Chevron #9-4240 station at 4807 Las Virgenes Road
- The subsurface hydrogeologic conditions, which include bedrock and an apparent steep dip, have not been discussed in detail in the SWRCB UST Case Closure Review Summary Report (11/15/13), although it may affect the groundwater flow direction significantly.
- Well MW09 for the Mobil #18-LDL state, located offsite to the west in Las Virgenes Rd (between the Mobil station and the Shell & Chevron stations across the street to the west), had a TBA concentration most recently of 48,000 µg/L, which (if the groundwater flow direction is actually more southwesterly) could be migrating (or has migrated over the past decade) to beneath the Shell and Chevron station sites, where groundwater remediation (esp. for TBA or TBA & benzene) is ongoing. Well MW09 has shown a recent TBA increase from 6,100 µg/L (Jan 2012) to 20,000 µg/L (July 2012) to 48,000 µg/L (April 2013). There may be a comingled plume amongst the three sites. See attached one-page figure (powerpoint) that tries to show the three adjacent UST cases and differing groundwater flow direction (red arrows).
- The concentration of TBA in groundwater in other Mobil monitoring wells, particularly MW05 and MW06, have shown increasing trends (and MW02 showed an increasing trend thru 2004, then monitoring was stopped). (also increasing trend in MW12, SW property boundary in direction of Shell & Chevron stations, thru early 2012). See attached trend graphs (printout from GeoTracker function).

- The SWRCB UST Case Closure Review Summary Report does not show graphs for MW06 (highest TBA concentration of any monitoring well, clearly increasing TBA trend since 2003) or MW09 (offsite well to the west, between the Mobil station and the Shell & Chevron stations)
- Although the SWRCB UST Case Closure Review Summary Report reports dual phase extraction (DPE) remediation occurred at the site from 1999 to 2003, details about the amount of petroleum hydrocarbons removed, whether it reached asymptotic conditions, its effectiveness, or whether there were post-DPE confirmation soil borings are not mentioned. For soil excavation that reportedly occurred in 1986 and 1987, a corresponding report or other documentation such as waste disposal manifests are not found in our case files.
- The SWRCB UST Case Closure Review Summary Report states that no free product has been reported in GeoTracker, but the monitoring reports show that free product was detected in MW 10, MW11, and MW16 in the 1992-95 time frame, an Oct 1995 report in the case files states: "Volume of Free Product Recovered to Date: 16,195 gallons" and another report (Feb 2000) in the case files states that:
 - The USTs were installed below the water table
 - 6,000 gallons of fuel product/water mixture was pumped from the subsurface in Nov 1991 following a turbine flex line leak
 - 10,000 gallons of fuel product/water mixture was pumped from the UST pit in Feb 1993
 - 7,200 gallons of fuel product/water mixture was pumped from the UST cavity in Apr 1993
 - One of the four USTs ruptured in 1994, and this UST was replaced. 13,779 gallons of product were pumped out of the UST pit, and 170 tons of soil were removed
- The summary of soil data in the SWRCB UST Case Closure Review Summary Report lists soil data as "NA" and we have not seen a recent summary of historical data to support the SWRCB assertion that soil results fall below the Low Threat Underground Storage Tank Case Closure Policy criteria for direct contact. It appears that soil samples have not been collected for possibly 18 years.

In summary, Regional Board staff concerns focus on the high TBA concentrations in groundwater, the differences in groundwater flow direction reported in the vicinity, comingled plume possibly affecting other sites, some wells showing increasing TBA concentrations so lack of plume stability, lack of soil data, and questions about historical remediation and free product information.

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