



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Los Angeles Regional Water Quality Control Board

December 4, 2013

Ms. Vivian Gomez-Latino  
State Water Resources Control Board  
1001 I Street, P.O. Box 2231  
Sacramento, CA 95812

**COMMENTS ON PROPOSED UNDERGROUND STORAGE TANK CASE CLOSURE -  
CONOCOPHILLIPS COMPANY #254000, 2551 W. MAIN STREET, ALHAMBRA, LOS  
ANGELES COUNTY  
(LOS ANGELES WATER BOARD CASE NO. R-38261) (GLOBAL ID NO. T0603704889)**

Dear Ms. Gomez-Latino:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) received the State Water Resources Control Board's (State Water Board) "Notice of Opportunity for Public Comment" (Notice) dated October 2, 2013, regarding the proposed underground storage tank (UST) case closure of the above-referenced site. The Notice indicates that the State Water Board UST Cleanup staff has determined that the case meets the general and media-specific criteria of the "Low-Threat UST Case Closure Policy" (Policy) and has made a recommendation to the State Water Board's Executive Director for UST case closure. Upon reviewing the draft Order and "UST Case Closure Summary," the Los Angeles Water Board has the following comments on the proposed case closure.

### General Criteria

The UST Case Closure Summary states that the site "meets all eight general criteria under the Policy." The Los Angeles Water Board disagrees that the site meets General Criteria "f" (secondary source has been removed to the extent practicable). Recent groundwater monitoring data continues to indicate that the groundwater at the site remains impacted by petroleum. In fact, the Semi-Annual Status Report, First and Second Quarters 2013, clearly demonstrate that the groundwater concentrations of total petroleum hydrocarbons as gasoline (TPH<sub>G</sub>), benzene, toluene, ethylbenzene, xylenes, and methyl tertiary butyl ether (MTBE) have increased over time, rather than decrease as stated in the UST Case Closure Summary. During sampling events in May 2013 and December 2012, TPH<sub>G</sub> increased to 7,000 micrograms per liter (µg/L) from 1,900 µg/L, benzene increased to 250 µg/L from 68 µg/L, toluene increased to 1,100 µg/L from 460 µg/L, ethylbenzene increased to 460 µg/L from 70 µg/L, xylenes increased to 2,600 µg/L from 320 µg/L, and MTBE increased to 1,600 µg/L from 530 µg/L, respectively, at groundwater monitoring well MW-4. During the same sampling events, tertiary butyl alcohol (TBA) also increased at groundwater monitoring well MW-2 to 1,600 µg/L from 850 µg/L, as well as at groundwater monitoring well MW-12 to 1,500 µg/L from 1,000 µg/L. Groundwater monitoring wells MW-4, MW-2, and MW-12 are located on-site near the USTs area (point of release from the primary source) and off-site cross-gradient to the USTs area, respectively.

MARIA MEHRANIAN, CHAIR | SAM UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)

Given that the sampling events occurred approximately five months apart, this data clearly indicates that the petroleum-impacted groundwater plume is not currently stable and may continue to be a secondary source of pollution at the site. Moreover, the State Water Board has not presented any information suggesting or determining that secondary source removal would be technically or economically feasible at the site. Accordingly, the site has not met General Criteria "f".

#### Groundwater Media-Specific Criteria

Pursuant to the Policy, "[i]f groundwater with a designated beneficial use is affected by an unauthorized release, to satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites..." in the Policy. The UST Case Closure Summary states that the site meets the criterion in Class 5 of the Policy. The Los Angeles Water Board disagrees that the site meets the media-specific criteria for groundwater. As shown above, recent groundwater monitoring samples taken only approximately five months apart indicate that the contaminant plume is not currently stable or decreasing in areal extent. Rather than decreasing, as determined in the UST Case Closure Summary, this data suggests that the groundwater concentrations of TPH<sub>G</sub>, benzene, toluene, ethylbenzene, xylenes, and MTBE are increasing. Because the plume is not currently stabilized, it continues to pose a threat to groundwater quality. In addition, the current instability of the plume does not provide the necessary assurance to either the Los Angeles Water Board or the State Water Board that water quality objectives will be achieved within a reasonable time frame.

#### Requested Action

Given the information presented above, the Los Angeles Water Board requests that the State Water Board not close the site at this time. Groundwater monitoring should continue until data indicates that the plume is stable.

If you have any questions, please contact Mr. Noman Chowdhury at (213) 576-6704 or [nchowdhury@waterboards.ca.gov](mailto:nchowdhury@waterboards.ca.gov), Mr. Gregg Kwey at (213) 576-6702 or [gkwey@waterboards.ca.gov](mailto:gkwey@waterboards.ca.gov), or Dr. Yue Rong at (213) 576-6710 or [yrong@waterboards.ca.gov](mailto:yrong@waterboards.ca.gov).

Sincerely,

*Sw*   
Samuel Unger, P.E.  
Executive Officer

Cc: Ms. Kathy Jundt, State Water Resources Control Board, UST Cleanup Fund  
Mr. Ben Heningburg, State Water Resources Control Board  
Ms. Jennifer Fordyce, State Water Resources Control Board  
Mr. Tim Smith, Los Angeles County Department of Public Works, Environmental  
Programs Division, Underground Tanks  
Ms. Debbie Meager, City of Alhambra  
Ms. Phuong Ly, Water Replenishment District of Southern California  
Mr. Richard Lavin, Los Angeles County, Department of Public Health, Environmental  
Health Division-Water & Sewage  
Mr. Tim Bishop, Chevron Environmental Management Company  
Mr. Timothy Limbers, Arcadis

