



December 18, 2015

VIA EMAIL to [USTClosuresComments@waterboards.ca.gov](mailto:USTClosuresComments@waterboards.ca.gov)

Ms. Vivian Gomez-Latino  
State Water Resources Control Board  
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### **Comment Letter – Madison Industries Proposed UST Case Closure**

Golden State Water Company (GSWC) has received the State Water Resources Control Board's (SWRCB) "Notice of Opportunity for Public Comment, Proposed Underground Storage Tank Case Closure, Madison Industries (Case No. R-14732)" letter dated October 12, 2015. Based on review of publically available documents related to the subject underground storage tank (UST) site (e.g., see [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T10000003669](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000003669)) GSWC respectfully offers the following comments:

- The subject UST site resides within the boundaries of GSWC's Florence-Graham water system. However, the GeoTracker website incorrectly designates the Metropolitan Water District of Southern California as the primary water system operator.
- GSWC owns and operates six public water-supply wells (not including destroyed wells formerly owned by GSWC) within a one-mile radius of the subject UST site. Two wells (Converse 1 and 2) are located approximately 1,550 feet west, three wells (Miramonte 1, 2, and 3) are located approximately 5,100 feet south-southwest, one well (Nadeau 3) is located approximately 4,800 feet south of the subject UST site. The Converse 1 and 2 wells are located generally downgradient of the subject UST site based on Fall 2014 groundwater elevation contours in the deeper principal aquifers of the Central Basin, which were obtained from the Water Replenishment District of Southern California.
- The uppermost perforations in these wells occur at 296 and 600 feet below ground surface (bgs) for GSWC's Converse 1 and 2 wells, 1,332, 550, and 580 feet bgs for GSWC's Miramonte 1, 2, and 3 wells, respectively, and 575 feet bgs for GSWC's Nadeau 3 well, or approximately 130, 433, 1,188, 406, 437, and 432 feet below mean sea level, respectively.

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- Regular sampling of GSWC's Converse 1 well since 1987 (DDW Source ID = 1910077-009), Converse 2 well since 1985 (DDW Source ID = 1910077-010), Miramonte 1 well since 1988 (CDPH Source ID = 1910077-003), Miramonte 2 well since 1985 (DDW Source ID = 1910077-004), Miramonte 3 well since 1988 (DDW Source = 1910077-005), and the Nadeau 3 well since 1988 (DDW Source = 1910077-007) suggests that, with the exception of the detection of chlorinated solvents such as perchloroethene or trichloroethene in most of the wells, fuel-related organic compounds have not been detected in groundwater produced by the wells.
- Based on data obtained from Water Replenishment District of Southern California (WRD), a downward vertical hydraulic gradient between the shallow unconfined aquifer and deeper drinking water aquifers exists in the area, which increases the threat to drinking water aquifers posed by contaminants at the subject UST site.
- Based on data obtained from WRD, a few aquitards appear to exist between the shallow unconfined aquifer and deeper drinking water aquifers in the area, which may impede downward migration of contaminants detected at the subject UST site.
- Based on limited groundwater elevation data from monitoring wells at the subject UST site, as well as data collected between 2007 and 2011 from monitoring wells located approximately 300 to 400 feet to the east, at the adjacent Lonza, Inc. site (i.e., see [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=SL2042T1544](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL2042T1544)), groundwater flow in the shallow unconfined aquifer in the area ranges from the north-northwest to north-northeast. However, no monitoring wells appear to have been installed close to the intersection of Wilmington Avenue and East 64<sup>th</sup> Street, or directly downgradient of the former USTs and documented soil contamination. In addition, it is unclear whether polycyclic aromatic hydrocarbons (PAHs) detected in soil beneath the former USTs (e.g., naphthalene), which appear to suggest a release consisting of petroleum, as defined in Low Threat Closure Policy (LTCP) General Criterion b, were targeted for analysis in groundwater samples collected from monitoring wells at the subject UST site. Therefore, it is unclear whether the nature and extent of groundwater contamination have been completely assessed and General Criterion e of the LTCP has been satisfied, consistent with the 6/18/15 LTCP checklist.
- Based on the publically available information, it is not clear whether contaminated soil associated with the USTs was excavated and removed from the subject UST site. So, it is unclear whether General Criterion f of the LTCP has been satisfied, consistent with the 6/18/15 LTCP checklist.

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- Because the downgradient extent of groundwater contamination does not appear to have been delineated, the length of any contaminant plume likewise does not appear to have been assessed. In addition, contaminant concentrations over longer time periods at sites like the subject UST site can increase with increasing groundwater elevation and decrease with decreasing groundwater elevation. This behavior suggests that, in the absence of other factors, contaminant concentrations may only be stable in so much as groundwater levels do not fluctuate and/or remain below any possible residual vadose zone soil contamination. In other words, contaminant concentrations associated with the subject UST site could increase in the future if groundwater elevations increase significantly. Furthermore, based on the limited number of groundwater sampling events (i.e., 2 events in two wells over roughly 1/2 year and 3 events in one well over roughly 1-1/2 years), it is unclear whether statistically meaningful conclusions can be drawn with respect to trends in the extent, or concentrations, of contaminants over time. Thus, it is unclear whether the Groundwater-Specific Criterion of the 6/18/15 LTCP checklist has been satisfied.
- Because it is unclear whether all of the General and Groundwater-Specific Criteria have been satisfied, as described in the 10/5/15 UST Case Closure Summary, GSWC is unable to comment on potential impacts to drinking water aquifers in the area from contamination at the subject UST site.

Should you have any questions, please contact me at (714) 535-7711, extension 355.

Sincerely,



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Senior Hydrogeologist

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