



Golden State
Water Company
A Subsidiary of American States Water Company

March 19, 2015

VIA EMAIL to USTClosuresComments@waterboards.ca.gov

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

Comment Letter – J.D. Fields Lumber 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 J.D. Fields Lumber Proposed UST Case Closure" letter dated December 26, 2014. Based on review of the 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=T0603793085)

GSWC respectfully offers the following comments:

- GSWC, as opposed to the Metropolitan Water District of Southern California, which is incorrectly identified in association with General Criterion a of the 11/30/14 Low Threat Closure Policy checklist, owns and operates five public water-supply wells within a one-mile radius of the site (not including destroyed wells owned by GSWC). Two of these wells (Ballona 4 and 5) are located about 3,300 feet east (generally downgradient at times) of the subject UST site, two wells (Southern 5 and 6) are located about 4,900 feet southeast (generally downgradient at times) of the subject UST site, and one well (129th Street 2) is located about 5,200 feet west (generally upgradient) of the subject UST site, based on Fall 2013 groundwater elevation contours for the principal aquifers in the basin, which were obtained from the Water Replenishment District of Southern California (WRDSC).
- The uppermost perforations in these wells occur at 300 and 290 feet below ground surface (bgs) for GSWC's Ballona 4 and 5 wells, at 420 and 400 feet bgs for GSWC's Southern 5 and 6 wells, and at 620 feet bgs for GSWC's 129th Street 2 well, or approximately 163, 153, 332, 502, and 572 feet below mean sea level, respectively.
- Based on data obtained from WRDSC, and for the BP HITCO site at 1600 West 135th Street

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(http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL204791669), which is located about 2,800 feet south of the subject site, a downward vertical hydraulic gradient between the shallow unconfined aquifer and deeper drinking water aquifers likely exists in the area. This increases the potential threat to drinking water aquifers posed by contaminants that have been released at the site.

- Based on data obtained from WRDSC, at least one aquitard appears to exist between the shallow unconfined aquifer and deeper drinking water aquifers in the area, which may impede downward migration of contaminants that have been released at the site.
- Regular sampling of downgradient GSWC wells Ballona 4 (CDPH Source ID = 1910155-043), Ballona 5 (CDPH Source ID = 1910155-069), Southern 5 (CDPH Source ID = 1910155-039), and Southern 6 (CDPH Source ID = 1910155-045), since these wells were installed between 1988 and 2005 suggests that fuel-related volatile organic compounds (VOCs) have not been detected in groundwater produced by the wells.
- Depth to groundwater at the site in 1999 is estimated to have been about 45 feet bgs based on data from the BP HITCO site. And, soil contamination was found at depths of 10 and 18 feet bgs beneath Tank 1, or at most about 35 to 27 feet above the water table, respectively, based on the estimated depth to groundwater. Evidence of gasoline contamination in soil beneath Tank 1 included Total Petroleum Hydrocarbons [as gasoline] measured at a concentration of 852,000 ug/kg about 35 feet above the water table, Xylene at 119,000 ug/kg about 27 feet above the water table, and Methyl-tert butyl-ether (MTBE) at 22 ug/kg about 27 feet above the water table. In addition, because of the 2,000 ug/kg laboratory detection limit for soil collected at about 35 feet above the water table beneath the north end of Tank 1, it is likely that the concentration of MTBE at this depth could have been significantly higher than the 22 ug/kg found about 27 feet above the water table.
- The Los Angeles County Department of Public Works (LACDPW) approved of a 10/15/00 site investigation work plan on 2/20/02 to, in part, define the vertical and lateral extent of contamination at the site via drilling and sampling of three 50-foot-deep borings near Tank 1. However, it is unclear if this work plan was ever implemented because there is no documentation of this investigation available on the SWRCB's GeoTracker web page for this site. The 11/22/13 UST Path to Closure Plan also identifies impediments to site closure and indicates that a work plan be developed to define the extent of the contaminant release documented at the site. However, it is not clear from the limited publically available information whether any further site investigation activities have been performed. Thus, it is not clear if the extent

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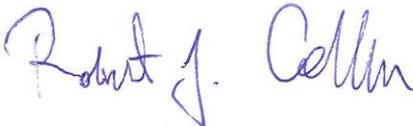
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of gasoline contamination documented beneath Tank 1 has been determined and whether General Criterion e of the 11/30/14 Low Threat Closure Policy checklist has been met.

- It is not clear whether contaminated soil beneath Tank 1 was excavated and removed from the site, so it is unclear whether General Criterion f of the 11/30/14 Low Threat Closure Policy checklist has been met.
- Given the elevated concentrations of gasoline contaminants in soil, the relatively short distance between soil contamination and groundwater, and the highly mobile nature of MTBE, it is reasonable to suspect that groundwater might have been affected by MTBE. However, it is unclear whether the Groundwater-Specific Criterion of the 11/30/14 Low Threat Closure Policy checklist has been satisfied. This is because no data are available, such as sampling results from the proposed 50-foot-deep borings, to preclude the presence of groundwater contamination at the site. Thus, GSWC is unable to comment on potential impacts to drinking water aquifers in the area from operation of USTs at the subject site.

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

Sincerely,

A handwritten signature in blue ink that reads "Robert J. Collar". The signature is written in a cursive, flowing style.

Robert J. Collar, PG, CHG
Senior Hydrogeologist

cc: George Lockwood, State Water Resources Control Board
Matthew Cohen, State Water Resources Control Board
Yue Rong, Los Angeles Regional Water Quality Control Board
John Awujo, Los Angeles County Department of Public Works
Phuong Ly, Water Replenishment District of Southern California
David Chang, GSWC
Toby Moore, GSWC
Alex Chakmak, GSWC