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**Via Email and First Class Mail**

October 15, 2015

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board –  
Los Angeles Region  
320 W. Fourth Street, Suite 200  
Los Angeles, California 90013

Re: *Former Kast Property, Case No. SCP 1230 – Submission of Remedial Design and Implementation Plan*

Dear Executive Officer Unger:

On behalf of Shell Oil Company and Shell Oil Products US (collectively “Shell”), enclosed please find the Remedial Design and Implementation Plan (RDIP) for the former Kast Property (Site), which is being submitted pursuant to the Amended Cleanup and Abatement Order (CAO) issued by the Regional Water Quality Control Board – Los Angeles Region (Regional Board) for the Site. The Amended CAO directs Shell and Barclay Hollander Corporation (BHC), a wholly-owned subsidiary of Dole Food Company Inc., to implement the approved Revised Remedial Action Plan (RAP), and, as part of that directive, to prepare and submit the RDIP. The enclosed RDIP was prepared by Shell Oil Products US and its consultants to meet Shell Oil Company’s responsibilities under the Amended CAO. BHC did not participate in any way in the preparation of the RDIP; nor has it paid any of the expenses associated with the RDIP, the investigation of the Carousel neighborhood, preparation of the RAP and the other activities required under the Amended CAO and the Revised RAP. This RDIP is being submitted solely on behalf of Shell.

The RDIP provides the overall technical details for implementing a remedial strategy that fully addresses the environmental conditions in the Carousel neighborhood. This document was

prepared using well-accepted and established scientific guidance and protocols, including the guidance documents specified by the Regional Board in the Amended CAO for this site.

The RDIP provides a detailed plan for implementing the scope of remedial actions described in the approved RAP to address impacts to soil, soil vapor, and groundwater at the Site. The primary components of the remedial actions include:

- Excavation of shallow soils from both landscaped and hardscaped areas of residential yards at identified residential properties. Excavation will be conducted to a depth of 5 feet below ground surface (bgs) throughout the accessible areas of front and back yards at approximately 208 properties identified based on Site characterization data and findings of the Human Health Risk Assessment (HHRA), subject to setbacks to protect structures and sensitive utilities. The excavation will also remove residual concrete slabs, to the extent practicable, if encountered within the depth excavated.
- Excavation of deeper soils between 5 and approximately 10 feet bgs at approximately 85 properties where significant hydrocarbon mass can be reduced based on the distribution and concentration of hydrocarbons detected. This targeted deeper excavation will be conducted only where a 5-foot excavation is already scheduled, where equipment access is feasible and excavation can be achieved safely, subject to allowable setbacks from structures and sensitive utilities.
- Following excavation, a combination of soil vapor extraction (SVE) and bioventing will be used to address residual petroleum hydrocarbons and volatile organic compounds (VOCs) in soils below the depth of excavation and in areas not excavated. Soil vapor, including methane, will be addressed by active extraction using SVE and hydrocarbons will be treated by promoting degradation of residual hydrocarbon concentrations via bioventing. SVE wells will be installed in City streets and on approximately 224 residential properties.
- Sub-slab depressurization (SSD) systems will be installed at 29 properties. In addition, while the data do not indicate that vapor intrusion is an issue at any of the residences, Shell has offered installation of SSD systems to any of the homeowners in the Carousel neighborhood that request one to alleviate concerns about potential impacts to their indoor air from the Site.
- LNAPL will continue to be recovered where it has accumulated in monitoring wells MW-3 and MW-12, and will be recovered in additional wells if it accumulates at a measurable thickness.
- COCs in groundwater will be reduced to the extent technologically and economically feasible via source reduction and monitored natural attenuation (MNA).

The RDIP includes discussion of specific tasks necessary to implement the RAP. It also includes detailed design drawings and specifications for the SVE/bioventing and SSD systems. The Site cleanup work will be implemented by a team of contractors licensed in their area of specialty who will be working under the technical direction of licensed engineers and geologists. The work will be done under applicable permits issued by state and local agencies.

This RDIP also provides an overview of the Property-Specific Remediation Plans (PSRPs), which will be prepared for each property where remedial work will occur. PSRPs will contain detailed plans for remedial activities on a property-by-property basis, including site restoration. As the PSRP for a residence is being prepared, representatives of Shell will meet with the property owners and residents to explain the work that will be done at the property, discuss scheduling, temporary accommodations and logistics, as well as site restoration, including any necessary removal and replacement of hardscape and landscaping features. The PSRPs will then be submitted to the Regional Board for review.

The Amended CAO and the Final Certified EIR directed Shell and BHC to implement the Project Design Features (PDFs) and Mitigation Measures (MMs) and comply with the MMRP set forth in the Amended CAO. The RDIP identifies these PDFs and MMs and specifies how they will be addressed. Appendix O of the RDIP contains a cross-reference table that identifies where the PDFs and MMs are addressed within the document.

As Appendices to this RDIP, Shell is submitting required supporting plans for implementing the work, including a project-specific Health and Safety Plan, Site-specific Rule 1166 Soil Mitigation Plan, Relocation Plan and Optional Real Estate Program, Stormwater Pollution Prevention Plan (SWPPP) and Rain Event Action Plan (REAP) which satisfies the requirement for the Wet Weather Erosion Control Plan (WWECP), Emergency Response Plan, Construction Traffic Management and Haul Route Plans, Post-Excavation Documentary Sampling and Post-Construction Long-Term Sampling and Monitoring Plan, SVE System Operations and Maintenance (O&M) Plan, and Surface Containment and Soil Management Plan.

A tentative project schedule for RAP implementation is also discussed in this RDIP. The construction phase of Site remediation, including installation of the SVE/bioventing system is expected to take approximately 5 years. Following the active construction phase, operations and maintenance of the SVE/bioventing system will occur for approximately 30 to 40 years.

Shell plans to begin meeting right away with the homeowners and residents at individual properties (and their legal representative) where work first will be performed, to explain the PSRPs, answer questions, gather information that will be used in arranging alternative accommodations during the work, and schedule the work.

The next step is for the Regional Board and the other involved agencies to review and approve the RDIP. Once the RDIP is approved by the Regional Board, the first set of PSRPs will be prepared and submitted for review by the applicable deadline as required by the Amended CAO.

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Once the first set of PSRPs is reviewed, the necessary permits for the work have been issued, and all access is granted, remedial work in the Carousel neighborhood will begin.

Shell looks forward to continuing to work with the Regional Board and is committed to moving forward with implementing this Remedial Design and Implementation Plan as soon as possible.

Sincerely,

A handwritten signature in blue ink that reads "Douglas Weimer". The signature is written in a cursive style with a large initial 'D'.

Douglas Weimer  
Sr. Principle Program Manager  
Shell Oil Products US

Enclosure