STATE WATER RESOURCES CONTROL BOARD
STATE OF CALIFORNIA

In the Matter of the Los Angeles Regional Water Quality Control Board’s February 13, 2015, Report Review Comments and Requirements For Additional Subsurface Investigations, Pursuant to California Water Code Section 13267 Order, Issued to CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY and Requiring Certain Action Related to the Former Texaco Cypress Fee Property, 3000 90th Street, Inglewood, California (SCP No. 0084, Site ID No. 2040200).

PETITION NO.

CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY’S PETITION FOR REVIEW, REQUEST FOR A HEARING, AND REQUEST FOR STAY

I. PETITION FOR REVIEW

Pursuant to California Water Code section 13320 and Title 23 of the California Code Regulations (“CCR”) sections 2050 et seq., Petitioner Chevron Environmental Management Company, a California corporation (“Chevron EMC” or “Petitioner”), hereby petitions the State Water Resources Control Board (“State Board”) for review of the Report Review Comments and Requirements For Additional Subsurface Investigations (“Directive”) issued by the Regional Water Quality Control Board, Los Angeles Region (“Regional Board”) on February 13, 2015, requiring certain actions related to the Former Texaco Cypress Fee Property, 3000 90th Street, Inglewood, California (SCP No. 0084, Site ID No. 2040200) (“the Site”). Petitioner requests that the Directive be rescinded. Petitioner further requests
that the Directive be stayed and requests a hearing in this matter.

As is discussed in greater detail below, the Directive violates State Board Resolution 92-49 because it requires Chevron EMC to perform substantial additional groundwater investigation at the Site despite the fact that the record demonstrates "a substantial likelihood of achieving compliance, within a reasonable time frame, with cleanup goals and objectives." (State Board Resolution No. 92-49 at p. 5.)

The Directive also violates State Board Resolution No. 92-49 because it fails to consider the financial burden of its requirements (estimated to be in excess of $1,590,000) and it has failed to support its conclusion that the costs of the required work bear a reasonable relationship to any benefit that could be obtained.

The Directive requires Chevron EMC to perform additional groundwater assessment, purportedly to "refine [Chevron EMC’s September 2014, Site Conceptual Model submitted by AECOM] and assist in closing the remaining data gaps and determining feasible groundwater remedial actions at the [S]ite.” Specifically, the Directive requires the installation of five multiple-depth groundwater monitoring wells within the deeper aquifer zones at or in the proximity of monitoring wells MW-5, MW-7, MW-14, MW-20, and MW-21 to "confirm the most recent groundwater grab sampling results and monitor changes of groundwater impacts. The wells at MW-5 and MW-7 must include “screened intervals designed and constructed to span . . . present and future anticipated water tables.” The Directive requires a work plan to be submitted by April 15, 2015.

The Directive requires additional investigation based on its improper determination that certain conclusions in the Site Conceptual Model (“SCM”) were not supported by existing data. Specifically, the Directive states that the vertical and horizontal extent of impacts to groundwater have not been adequately defined in the areas at and in the vicinity of MW-16. (Directive at p. 2.) It further states that “TPH and related compounds

1 The Site Conceptual Model can be found on GeoTracker at http://geotracker.waterboards.ca.gov/esi/uploads/geo_report/5311388134/SL204021484.PDF
2 While the Directive refers to MW 2, and not MW-21, it appears this is a result of a typo.
impacted groundwater encountered in well MW-16 . . . is considered a secondary source.”

(Id.) The “presence of elevated concentrations of benzene” in 2011, and “combined soil and groundwater sampling set” is stated to be “evidence of a residual secondary source, between the upper and lower bounds of the smear zone . . . .” (Id.) The Directive additionally states that because groundwater at, and in the vicinity of the Site, “has a designated beneficial use for current and future drinking water supply,” there is a “receptor pathway via groundwater ingestion” that the Regional Board considers to be complete. (Id.)

The requirements imposed by the Directive, and the conclusions upon which the requirements are based, are inappropriate and improper because they are not supported by the record, are arbitrary and capricious, and are in violation of law and policy. As discussed in the SCM, existing data establish that: no ongoing contaminant sources are present at or beneath the Site; the lateral and vertical definition of contaminant plumes has substantially been completed; multiple lines of evidence demonstrate that natural attenuation is occurring for TPH as gasoline (“TPHg”), benzene, toluene, ethylbenzene, total xylenes (“BTEX”), and tertiary butyl alcohol (“TBA”); and no complete receptor pathways were identified in the SCM. (Site Conceptual Model at Section 7.0.) Further, while a low-threat closure has not been requested at the Site, Site data demonstrate that the criteria of the State Board’s Low-Threat Underground Storage Tank Case Closure Policy have been satisfied, and thus there is no basis for the Directive’s requirement that Chevron EMC perform additional site characterization. (Declaration of Tiina Couture, ¶ 5.) While this Site is not a UST site, it is a petroleum release site, and thus the “criteria for closure evaluation . . . should be similar to those in this policy.” (Low-Threat Closure Policy at p. 2.) Here, the SCM concluded that no further Site characterization or remediation was necessary, and proposed only limited semi-annual monitoring mainly to monitor the trends of TBA, to confirm that it was continuing to naturally degrade and attenuate.

In addition, the owner of the property adjacent to the Site, where the new multiple-depth wells MW-5, MW-7, MW-14, MW-20, and MW-21 are required to be located, plans to redevelop its property, potentially as early as the fourth quarter of 2015. The
Directive requires Petitioner to install additional wells at a significant expense, which will need to be abandoned by year end in order to accommodate ground disturbing activities at the new development, and then incur the significant expense to reinstall the wells. Further, sampling of the new wells will also significantly increase Petitioner’s groundwater monitoring costs. Compliance with the Directive will thus cause Petitioner to incur significant and unreasonable expenses.

For the above reasons, the Directive should be rescinded and a stay should be granted.

II.  PETITIONER

The name and address of Petitioner is:

Chevron Environmental Management Company
6101 Bollinger Canyon Road
San Ramon, CA 94583

Petitioner should be contacted through its legal counsel:

ROGERS JOSEPH O’DONNELL, PC
ROBERT C. GOODMAN
311 California Street, 10th Floor
San Francisco, CA 94104
Telephone: (415) 956-2828
Facsimile: (415) 956-6457
E-mail: rgoodman@rjo.com

III.  ACTION OF THE REGIONAL BOARD TO BE REVIEWED

Petitioner respectfully requests that the State Board review the Directive, which inappropriately and improperly establishes the requirements described above. (A copy of the Directive is attached to the Declaration of Todd Littleworth as Exhibit A.)

IV.  DATE OF THE REGIONAL BOARD ACTION

The Regional Board issued the Directive on February 13, 2015.

V.  STATEMENT OF REASONS WHY THE REGIONAL BOARD’S ACTION WAS INAPPROPRIATE OR IMPROPER

As set forth more fully below, the action of the Regional Board is not supported by the record, and is arbitrary, capricious, and in violation of law and policy.
A. Background

1. The Site History

As stated in the SCM:

The Site was formerly occupied by the Cypress Fee Oil Field and the Inglewood Gas Plant. The Site was used for crude oil production from the 1920s until about 1984. Operations at the Site consisted of 18 operational oil/natural gas wells, bulk storage facilities consisting of two tank battery locations, and a natural gas pipeline. Four oil sumps were also located on-site. Crude oil was temporarily stored on-site and regularly trucked to an off-site refinery.

The Inglewood Gasoline Company leased approximately 2 acres in the southwestern corner of the Site and operated the Inglewood Gas Plant from 1939 to 1969. Natural gas (also referred to as wet gas or wet methane) that was recovered during crude oil extraction in the oil field was transported to the gas plant via pipelines and processed into a “dry” natural gas that was ready to be sold. The natural gas was shipped through the pipeline to the Southern California Gas Company. The Inglewood Gas Plant was modified in 1956 to manufacture liquefied petroleum gas.

(Site Conceptual Model at p. ES-1.)

2. Site Description and Current and Planned Land Uses

The Site consists of approximately 37 acres and is bordered to the west and south by the former Hollywood Park Race Track, to the east by Darby Memorial Park, and to the north by residential housing across Pincay Drive. (Site Conceptual Model at Section 2.1.) The Site was developed as a residential subdivision in 2004. (Id.) The owner of the former Hollywood Park property, Hollywood Park Land Company, LLC, plans to redevelop the property as a mixed-use development including commercial, entertainment, retail, and residential uses. (Declaration of Alexandra Galovich, ¶ 4.) Depending on which development option is selected, ground disturbing activities could begin as early as the fourth
quarter of 2015. (Galovich Decl., ¶¶ 7, 8.) Wells MW-5, MW-7, MW-14, MW-20, and MW-21 are located on this property. (Site Conceptual Model, Figure 2.) These wells would need to be removed before soil disturbing activities begin on the Hollywood Park property. (Galovich Decl., ¶ 9.)

3. Site Assessment and Remediation
   a. Historical Soil Assessment and Remediation

   In April 2001, the Regional Board issued a letter stating that “no further action is necessary for the soil at the subject site.” (Site Conceptual Model at p. ES-2.) This followed soil remediation activities that consisted of excavation of impacted soil, soil vapor extraction (“SVE”), and soil closure sampling. (Id.) 328,000 cubic yards of impacted soil were excavated from the former sump and tank battery areas. (Id.) The SVE system removed 48,864 pounds of volatile organic compounds (“VOCs”) over a period of 798 days. (Id.) VOC concentrations ranged from 2,000 parts per million by volume (“ppmv”) down to 500 ppmv during the initial 9 months of operation, with a final system inlet concentration of 22 ppmv just prior to shutdown. (Id.) Rebound sampling was performed and no VOCs were detected in any of the 16 soil vapor samples taken. (Id.)

   In December 2002, the Site was investigated for possible residential development. (Id.) A Site-wide soil vapor survey and soil sampling program was conducted by the developer to screen for VOCs, total petroleum hydrocarbons (“TPH”), metals, polychlorinated biphenyls (“PCBs”), and methane. (Id.) A total of 78 soil vapor borings were completed to 30 feet bgs, and 15 soil borings were completed to 20 feet bgs. (Id.) TPHg was detected at 800 micrograms per liter (“µg/L”) in one soil vapor sample. (Id.) Gasoline-related VOCs, including BTEX and TBA, were not detected in other soil vapor samples. (Id.) TPH was detected in soil at concentrations well below the cleanup level of 1,000 milligrams per kilogram (“mg/kg”) that was established for the Site. (Id.) The maximum detected concentration of TPH was 380 mg/kg from a soil sample collected at 5 feet bgs. (Id.) Methane concentrations were detected above the reporting limit (50 ppmv) in four soil vapor samples from three different areas. (Id.) The concentrations detected ranged
b. **Historical Groundwater Assessment and Remediation**

Groundwater monitoring has been performed at the Site since 1988. (Site Conceptual Model at p. ES-3.) Historical analytical data for the period from 1992 to the present is provided in Table 4 of the Site Conceptual Model. (Id.) The current groundwater monitoring network consists of one on-site well (MW-16) and 10 off-site wells (MW-5, MW-7, MW-8, MW-10, MW-13, MW-14, MW-15, MW-19, MW-20, and MW-21). (Id.) A groundwater pump-and-treat system (“GWTS”) was installed in the southwestern portion of the Site in 1994 with wells EW-1 and MW-9 used for extraction. (Id.) Operations continued through 1998 with over one million gallons of groundwater extracted and treated through a liquid-phase carbon filtration system. (Id.) Groundwater was collected from extraction wells EW-1 and MW-9 prior to the startup of the GWTS in September 1994 and benzene concentrations were detected at 12,000 µg/L and 8,400 µg/L, respectively. (Id.) When the pumps were removed and the wells were sampled in September 1999, benzene concentrations had decreased to 739 µg/L and 2,180 µg/L, respectively. (Id.) By the time that the wells were abandoned in May 2004, concentrations of TPhg and BTEX compounds had decreased to non-detect for both EW-1 and MW-9. (Id.) Benzene concentrations have significantly decreased during the period from 1992 to the present. (Id.) Benzene concentrations had been reduced to below detection limits when the on-site wells (EW-1, MW-4, MW-6, MW-9, MW-11, and MW-12) were abandoned in 2004. (Id.) TPhg concentrations have generally had similar trends as benzene concentrations. (Id.)

c. **2014 Soil and Groundwater Assessment**

In an August 2, 2012, directive, the Regional Board required additional soil and groundwater investigation.³ An additional soil and groundwater assessment was performed and the results presented in the Site Conceptual Model. Six soil borings were

---

advanced from March to May of 2014 using mud rotary drilling. (Site Conceptual Model ES-
3.) The soil borings were advanced in close proximity to existing wells to provide additional
vertical and lateral delineation of petroleum hydrocarbon impacts to soil and groundwater in
the saturated zone. (Id.) Depth-discrete groundwater grab samples were collected to show
that the existing groundwater monitoring wells are screened at depth intervals that are
representative of where the main impacts are detected. (Id.) Sample SB-2 was located to the
south of MW-7, SB-3 to the southwest of MW-13, SB-4 adjacent to MW-15, SB-5 adjacent
to MW-20, SB-6 adjacent to MW-5, and SB-7 adjacent to MW-21. (Id.)

The vertical distributions of benzene, TPHg, and TBA resulting from the 2014
soil boring program are discussed in the Site Conceptual Model which states as follows:

*Benzene:* The highest benzene concentrations were detected in the depth
interval from 170 to 190 feet bgs in both soil and groundwater grab samples. A
benzene isoconcentration contour of 100 µg/L shows the impacts extending
from MW-20/SB-5 to MW-13/SB-3. The wells, MW-20 and MW-13, are
screened in the interval of highest impacts; however, benzene concentrations
have been detected at low concentrations for MW-20 (3.1 µg/L in June 2014)
and not detected for MW-13 during semiannual sampling events. In the zones
both above and below the impacted interval (170 to 190 feet bgs), benzene
cconcentrations ranged from non-detectable to low laboratory-estimated
concentrations. The area below 190 feet bgs generally corresponds to a finer-
grained material.

*TPHg:* The highest TPHg concentrations correspond with the depth intervals
(170 to 190 feet bgs) of the highest benzene concentrations. TPHg was not
detected below 190 feet bgs in soil samples. The deepest TPHg detection in
groundwater was a laboratory-estimated concentration of 0.45 µg/L for SB-6 at
220 feet bgs.

*TBA:* The highest TBA concentrations were detected for SB-3 (located near
MW-13) and SB-7 (located near MW-21) in the interval from 170 to 200 feet
bgs. TBA was not detected below 210 feet bgs for SB-7. The TBA concentration for SB-3 declined to 14 µg/L at 240 feet bgs, which is near the NL of 12 µg/L.

(Site Conceptual Model at pp. ES-3 – ES-4.)

The Site Conceptual Model also addressed the lateral distribution of petroleum hydrocarbons in groundwater beneath the Site using data collected during the most recent groundwater monitoring event in June 2014. The distribution of each of these compounds is discussed below:

**Benzene:** Benzene isoconcentration contours show that the highest benzene concentration is located at well MW-21 (170 µg/L). The benzene plume is well defined with the majority of the perimeter wells, including all downgradient wells, having no detectable concentrations. To the northwest, well MW-20 had a concentration of 3.1 µg/L, which is close to the MCL of 1.0 µg/L. This definition of the benzene plume is further supported in the upgradient direction by the latest available values (shown as shaded boxes), at the abandoned well locations (CHEV-2, MW-1, MW-3 and MW-12) that are upgradient of the former Gas Plant and all had benzene concentrations below the detection limit at the time of their abandonment.

**TPHg:** TPHg isoconcentration contours show that the highest TPHg concentrations are located at well MW-21 (830 µg/L) and MW-16 (750 µg/L). The TPHg plume is well defined with the perimeter wells having either non-detectable or low laboratory-estimated concentrations. This definition of the TPHg plume is further supported in the upgradient direction by the latest available values (shown as shaded boxes), at the abandoned well locations (CHEV-2, MW-1, MW-3 and MW-12) that are upgradient of the former Gas Plant and all had TPHg concentrations below the detection limit at the time of their abandonment.

**TBA:** TBA concentrations are shown for two time intervals: May 2012 is the
first sampling event that included all of the wells in the current well network, and June 2014 is the most recent sampling event. The concentration trends at wells MW-16 and MW-21 from May 2012 to June 2014 indicate that both the plume size and the concentrations have declined over this time period. The current high concentration is located at MW-21 (230 µg/L). The perimeter wells were generally stable from 2012 to 2014, with minor increases for some wells and decreases for others. MW-7 and MW-19 had no detectable concentrations in both 2012 and 2014. Due to the relatively recent installation of wells MW-16 (2011) and MW-21 (2012), additional groundwater monitoring data are required to establish a longer-term trend for the TBA plume.

(Site Conceptual Model at ES-4.)

B. The Regional Board’s Action Was Inappropriate and Improper, and the Directive Should be Rescinded

The SCM, which followed decades of investigation and remediation, demonstrated “a substantial likelihood of achieving compliance, within a reasonable time frame, with cleanup goals and objectives.” (State Board Resolution No. 92-49 at p. 5.) Accordingly, the Directive, by requiring further investigation in the face of such evidence, is contrary to the provisions of State Board Resolution No. 92-49. The Directive is also inconsistent with State Board Resolution No. 92-49 in its failure to consider the financial burden of its requirements and in its conclusion that the costs bear a reasonable relationship to any benefit that could be obtained, a conclusion that is not supported by evidence in the record. (Id.)

1. The Site Conceptual Model Demonstrated That There Was a Substantial Likelihood of Petitioner Achieving Compliance, Within a Reasonable Time Frame, With Cleanup Goals and Objectives of the Site Without Further Investigation or Remediation

As discussed in the SCM, Site data demonstrate that no further investigation or remediation is necessary at the Site because: no ongoing contaminant sources are present at or beneath the Site; the lateral and vertical definition of contaminant plumes has
substantially been completed; multiple lines of evidence indicate that natural attenuation is occurring for TPHg, BTEX, and TBA; and no complete receptor pathways were identified in the SCM. (Site Conceptual Model at Section 7.0.) Further, while a low-threat closure has not been requested at the Site, Site data demonstrate that the criteria of the State Board’s Low-Threat Underground Storage Tank Case Policy have been satisfied. (Couture Decl. at ¶¶ 5-6.) As discussed above, while the Site is not a UST site, it is a petroleum release site, and thus the “criteria for closure evaluation . . . should be similar to those in this policy.” (Low-Threat Closure Policy at p. 2.) Accordingly, the requirements imposed by the Directive, and the statements that serve as a basis for those requirements, are inappropriate and improper because they are not supported by the record, are arbitrary, and capricious, and are in violation of law and policy.

a. There is no ongoing contaminant sources present at or beneath the Site

The Directive states “TPH and related compounds impacted groundwater encountered in well MW-16 . . . is considered a secondary source.” (Directive at p. 2.) The “presence of elevated concentrations of benzene” measured in 2011 when groundwater elevations were stated to be six feet lower, and the “combined soil and groundwater sampling set” is stated to be “evidence of a residual secondary source, between the upper and lower bounds of the smear zone . . . .” (Id.) As discussed in the SCM in Section 4.2, there was a “spike in the benzene concentration detected for MW-16, located in the previous source area, when the well was initially installed in 2011.” However, the detected concentration “was reduced by two orders of magnitude in the next two monitoring events.” (Site Conceptual Model at Section 4.2.) While this suggests “that residual hydrocarbon impacts may be trapped in the soil at the interface between the vadose zone and groundwater and also below the groundwater level . . . , they do not significantly migrate into the groundwater unless disturbed.” (Id.) Further, “groundwater from wells downgradient from MW-16 has not shown a significant increase in benzene concentrations either before or after the installation of MW-16, suggesting that the benzene plume is attenuating with distance from the source area.” (Id.) Further, while “groundwater elevations measured in the 10 monitoring
wells at and near the Site have increased several feet since monitoring started, groundwater concentrations have decreased over the same timeframe.” This “strongly indicates that there is no significant source mass remaining in the capillary fringe beneath the Site.” (Site Conceptual Model at Section 6.4.3.) The Directive’s conclusion that impacted groundwater in this area is acting as a secondary source is thus unsupported by Site data.

b. The lateral and vertical definition of contaminant plumes has substantially been completed

As stated in the Site Conceptual Model:

- Residual hydrocarbon concentrations in soil below the former source area are mainly present between depths of 170-190 feet bgs in the saturated zone. Concentrations are low and not expected to represent a significant secondary source of groundwater contamination.

- The vertical extents of TPHg, benzene and TBA in groundwater have adequately been defined via the groundwater grab sampling described in this report. Main impacts for TPHg and benzene are encountered between depths of 170-190 feet bgs. TBA attenuation is less pronounced with depth compared to TPHg and benzene, but the vertical extent of TBA has been fully defined at the maximum depth explored in all but one location (SB-3) where TBA was detected at 14 µg/L or slightly above the NL of 12 µg/L.

- The lateral extent of TPHg and benzene plumes in groundwater have been adequately defined with generally low estimated values or non-detectable concentrations at the downgradient perimeter of the plume.

- The lateral extent of the TBA plume in groundwater has been adequately defined down to a level of approximately 110 µg/L in downgradient well MW-13. Due to the diffuse nature of the TBA plume, the lack of an ongoing TBA source to groundwater and the absence of a complete pathway, further definition of TBA is not
considered necessary or practical. In addition, comparison of the
groundwater plumes between May 2012 and June 2014 indicates that
the plume may be decreasing in size, but additional semiannual
groundwater monitoring is required to confirm this trend.

(Site Conceptual Mode at Section 7.0.)

c. **Multiple lines of evidence indicate that natural attenuation is occurring**

As stated in the Site Conceptual Model,

- Petroleum hydrocarbon impacts, including benzene in groundwater
  have consistently declined since monitoring began and the most
downgradient concentrations of the TPHg and benzene plumes are
currently either very low estimated values or nondetectable.
- Depletion of terminal electron acceptor parameters ("TEAPs"),
  including sulfate reduction is more prevalent along the centerline of the
  TPHg, benzene and TBA plume compared to the cross-gradient wells
  indicating that biodegradation is the most prevalent mechanism
  responsible for the decreases in TPHg and benzene plumes.
- TBA concentrations in groundwater have fluctuated over the years, but
  as described above, a comparison of the TBA plumes between May
  2012 and June 2014 indicates that the plume may be decreasing in size.
  Additional semi-annual groundwater monitoring is required to confirm
  this trend.

(Site Conceptual Mode at Section 7.0.)

d. **No complete receptor pathways were identified in the SCM**

As stated in the SCM, a receptor pathway is only considered to be complete if
all of the following elements are met: "(1) a mechanism of contaminant release from a
source, (2) a transport medium if potential receptors are not located at the source, and (3) a
point of potential contact of receptors with the contaminated medium." (Site Conceptual
Model at 6.0.) The Directive improperly concludes that because groundwater at, and in the vicinity of the Site, “has a designated beneficial use for current and future drinking water supply,” there is a “receptor pathway via groundwater ingestion” that the Regional Board considers to be complete. (Directive at p. 2.) This groundwater is not, however, used as a drinking water supply. (Site Conceptual Model at Section 6.4.3.) Nor is it used for irrigation or industrial supply. (Id. at Section 7.0.) Accordingly, there is not a complete receptor pathway.

e. The criteria of the State Board’s Low-Threat Underground Storage Tank Case Policy have been satisfied

In sum, the criteria of the State Board’s Low-Threat Underground Storage Tank Case Policy have been satisfied at the Site. (Exhibit 1 [Low-Threat Closure Policy Checklist for the Site] to the Couture Decl.) Satisfying the criteria of the Low-Threat Closure Policy demonstrates that the Site poses a low risk and that there is “a substantial likelihood of achieving compliance, within a reasonable time frame, with cleanup goals and objectives.” (State Board Resolution No. 92-49 at p. 5.) There thus is no basis for the Directive’s requirement that additional assessment of the Site be performed.

2. The Directive Imposes an Unreasonable and Unnecessary Financial Burden on Petitioner

The Directive failed to consider the financial burden of its requirements and failed to support its conclusion that that the costs bear a reasonable relationship to any benefit that could be obtained. (State Board Resolution No. 92-49 at p. 5.) The State Board has found that proper planning is needed to ensure cleanup activities are cost-effective and avoid unintended consequences. (State Board Resolution No. 92-49, Whereas 14-15.) Proper planning requires that conditions on the ground be considered. (Id.)

As an initial matter, the costs that would be incurred installing five multiple-depth groundwater monitoring wells are unreasonable and unnecessary because Site data shows that no further investigation or remediation is necessary. The cost of installing these wells is estimated to be $615,000. (Couture Decl., ¶ 8.) The owner of the Hollywood Park property, where the required multiple-depth wells MW-5, MW-7, MW-14, MW-20, and
MW-21 are required to be located, plans to redevelop the property. (Galovich Decl., ¶¶ 4-10.) Ground disturbing activities for could begin as early the fourth quarter of 2015. (Littleworth Decl. at ¶¶ 5-7.) Thus, the new wells would need to be abandoned, possibly by the end of 2015, to accommodate development at a cost of approximately $180,000. (Couture Decl., ¶ 9.) The wells would then need to be re-installed at a cost that is estimated to be $615,000. (Couture Decl., ¶ 8.) And the new wells would ultimately need to be abandoned at the point that the Regional Board determines they are no longer necessary at a cost of approximately $180,000. (Couture Decl., ¶ 9.) Petitioner would further incur approximately $45,000 per year in additional unreasonable and unnecessary costs associated with conducting groundwater sampling from these new wells. (Couture Decl., ¶ 10.) The costs associated with the requirements of the Directive will thus exceed $1,590,000.

VI. THE MANNER IN WHICH PETITIONER HAS BEEN AGGRIEVED

Petitioner has been aggrieved by the Regional Board’s actions because they will be subjected to provisions of an arbitrary and capricious finding unsupported by evidence in the record. Further, Petitioner will be forced to unnecessarily incur substantial costs.

VII. STATE BOARD ACTION REQUESTED BY PETITIONER

As discussed above, Petitioner requests that the State Board determine that it was inappropriate and improper to issue the Directive for the reasons stated above.

VIII. STAY REQUEST

Petitioner requests a stay of the requirements set forth in the Directive pending resolution of the issues raised in this Petition. This stay request is based on the attached Declarations of Todd Littleworth and Tiina Couture, which demonstrate (1) substantial harm to the Petitioner if a stay is not granted; (2) a lack of substantial harm to other interested persons and to the public interest if a stay is granted; and (3) substantial questions of fact or law regarding the disputed action.

A. LEGAL GROUNDS FOR A STAY

Under section 2053 of the State Board's regulations (23 CCR § 2053), a stay of the effect of an order shall be granted if the petitioner shows:
(1) Substantial harm to petitioner or to the public interest if a stay is not granted;

(2) A lack of substantial harm to other interested parties and to the public if a stay is granted; and

(3) Substantial questions of fact or law regarding the disputed action exist. These requirements are met in this case.

B. Petitioner will Suffer Substantial Harm if a Stay is not Granted

As discussed above, Petitioner will suffer substantial financial harm if a stay is not granted. If Petitioner complies with the Directive, it will likely incur over $1,590,000 to install, abandon, and reinstall the additional required wells. It will also incur an additional $45,000 per year in monitoring costs. If Petitioner were not to comply with the directive, it would be subject to substantial penalties, including misdemeanor liability. A stay until a determination is made as to the issues raised in the Petition would solve this problem and save Petitioner from significant and substantial monetary harm. (Littleworth Decl. at ¶ 10.)

C. The Public Will Not Be Substantially Harmed if a Stay Is Granted

As discussed above, the Site poses a low risk to the public. The granting of the stay will not change that fact. Thus, the public will not be substantially harmed if a stay is granted.

D. The Petition Raises Substantial Questions of Law and Fact

As discussed above, there are significant questions being posed in this case as to whether it would be proper and appropriate to impose work required by the Directive on Petitioner. As is discussed above, there are significant issues of fact and law that are sufficient to warrant the granting of a stay.

IX. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL ISSUES RAISED IN THE PETITION

For purposes of this filing, the Statement of Points and Authorities is subsumed in section V of the Petition. Petitioner reserves the right to supplement its Statement of Points and Authorities, and file additional points and authorities at a future date upon
receipt and review of the administrative record and as additional information and evidence is developed.

X. STATEMENT REGARDING SERVICE OF THE PETITION ON THE REGIONAL BOARD

A copy of this Petition is being sent to the Regional Board, to the attention of Samuel Unger, Executive Officer. Copies are also being sent to the interested parties identified on the attached proof of service. By copy of this Petition, Petitioner is also notifying the Regional Board and identified parties of the Petitioner’s request for a hearing and that the State Board issue a stay.

XI. STATEMENT REGARDING ISSUES PRESENTED TO THE REGIONAL BOARD

To the extent it had an opportunity to do so, Petitioner raised the substantive issues and objections raised in this Petition before the Regional Board prior to the filing of the Petition.

For all of the foregoing reasons, Petitioner respectfully requests that the State Board review the requirements set forth in the Directive and grant the relief as set forth above.

Dated: March 16, 2015

ROGERS JOSEPH O’DONNELL, PC

By: ROBERT C. GOODMAN
Attorneys for Petitioner
Chevron Environmental Management Company
I, Todd Littleworth, declare and state as follows:

1. I am Senior Counsel in the Environmental and Safety Law Group of the Chevron Corporation Law Department. Except as otherwise stated, I have personal knowledge of the matters stated herein and could testify to these facts if called upon to testify as a witness in this action.

Texaco Cypress Fee Property, 3000 90th Street, Inglewood, California (SCP No. 0084, Site ID No. 2040200) ("the Site") is attached here to as Exhibit A.

3. Chevron Environmental Management Company, a California corporation ("Chevron EMC"), is a company that manages site investigation and remediation on behalf of the Chevron Corporation family of companies.

4. Petitioner Chevron EMC will suffer substantial harm during the time that the Petition is subject to review by the State Water Resources Control Board if it is required to adhere to the arbitrary schedule for completion of the mandated tasks.

5. The Directive requires that additional monitoring wells be installed on the Hollywood Park property, which is south and west of the Site. As discussed in the Declaration of Alexandra Galovich, the owner of the Hollywood Park property plans to redevelop the property for residential use. Ground disturbing activities for the residential development could begin as soon as December 2015.

6. If Petitioner was required to install new wells on the Hollywood Park property before construction activities begin, the wells would then have to be abandoned and then reinstalled after ground distributing activities are completed. As stated in the Declaration of Tiina Courture, the cost of installing the wells, abandoning them to accommodate development, reinstalling the wells following development, and then abandoning them once the Regional Board is satisfied that no further monitoring is required, would exceed $1,590,000.

7. Under the terms of the Directive, this would either potentially subject Petitioner to unreasonable costs in installing, abandoning, then reinstalling the required wells, or being subject to substantial penalties, including misdemeanor liability.

///
///
///
8. A stay until a determination is made as to the issues raised in the Petition would solve this problem and save Petitioner from significant and substantial monetary harm.

I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct.

Dated this 16 day of March, 2015 in San Ramon, California.

[Signature]

Todd Littleworth
Exhibit 1
Los Angeles Regional Water Quality Control Board

February 13, 2015

Mr. Chris Penza  
Chevron Environmental Management Company  
9525 Camino Media  
Bakersfield, California 93311

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO. 7012 3460 0002 9486 3186

SUBJECT: REPORT REVIEW COMMENTS AND REQUIREMENTS FOR ADDITIONAL SUBSURFACE INVESTIGATIONS, PURSUANT TO CALIFORNIA WATER CODE (CWC) SECTION 13267 ORDER

SITE/CASE: FORMER TEXACO CYPRESS FEE PROPERTY, 3000 90TH STREET, INGLEWOOD, CALIFORNIA (SCP NO. 0084, SITE ID NO. 2040200)

Dear Mr. Penza:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the September 2014, Site Conceptual Model Report (SCM Report), submitted by AECOM on behalf of Chevron Environmental Management Company (CEMC), for the referenced site. The SCM Report includes a summary of the most recent phase of soil and groundwater assessment, consisting of the collection of depth-discrete soil and groundwater grab samples from six (6) soil borings during March to May of 2014; a Site Conceptual Model (SCM), and a work plan for continued semi-annual groundwater monitoring.

Based on our review of the information provided in the SCM Report, and previously submitted information, the Regional Board provides the following comments and requirements:

I. Additional Groundwater Investigation

A. Laboratory analytical results from groundwater grab samples collected during the most recent phase of investigation indicate the need to install multiple-depth groundwater monitoring wells within the deeper aquifer zones to confirm the most recent groundwater grab sampling results and monitor the changes of groundwater impacts.

B. In order to adequately define the vertical extent of the impacts to groundwater emanating from the site, and to compensate for the inability to collect adequate groundwater data from within the former site boundaries, additional multiple-depth groundwater monitoring wells are necessary at or in the proximity of monitoring wells MW-5, MW-7, MW-14, MW-20, and MW-2. An adequate network of monitoring wells in the down-gradient and cross-gradient directions from the former source area(s) is also necessary. The final screened interval of the additional multiple-depth wells should be completed at a depth immediately below the greater of the following:
i. the maximum depth at which any constituent of concern was historically detected at a concentration exceeding its respective California Maximum Contaminant Level (MCL), or, where total petroleum hydrocarbons as gasoline (TPHg) was detected at a concentration equal to or greater than 100 micrograms per liter (μg/L);

ii. the maximum depth equal to the historic low groundwater elevation measured within any of the three most proximal existing or abandoned monitoring wells at the site.

C. Due to the recent increases in groundwater elevation, the screened intervals for monitoring wells MW-5 and MW-7 are now submerged below the water table. Because the uppermost screened interval of a monitoring well in an unconfined aquifer must be constructed to span the water table, additional shallow monitoring wells must be installed at wells MW-5 and MW-7 with screened intervals designed and constructed to span both the present and future anticipated water tables.

2. Site Conceptual Model

A. Section 7.0 states that there are no ongoing contaminant sources present at or beneath the site. The Regional Board considers that the existing data set does not support this conclusion:

i. The vertical and horizontal extent of impacts to groundwater (including the smear zone above and below the present water table) have not been adequately defined in the areas at and in the vicinity of well MW-16, located in proximity to the former primary source area. TPH and related compounds impacted groundwater encountered in well MW-16 and other wells is considered a secondary source, which has impacted and will continue to impact more groundwater resource until adequately remediated.

ii. Previous groundwater sampling data from MW-16 document the presence of elevated concentrations of benzene in groundwater. Specifically, benzene was detected at concentrations up to 6,400 μg/L and 4,500 μg/L, respectively, during February and June 2011, when the measured groundwater elevation was approximately 6 feet lower than during the most recent sampling events. The combined soil and groundwater sampling data set (from both source area monitoring wells and step-out soil borings and monitoring wells) provides evidence of a residual secondary source, between the upper and lower bounds of the smear zone, which extends both above and below the current water table beneath the site.

B. Contrary to the statement included in Section 7.0 that no complete receptor pathways were identified, per the Water Quality Control Plan for the Los Angeles Region, groundwater at the site and in the vicinity has a designated beneficial use for current and future drinking water supply. Consequently, the receptor pathway via groundwater ingestion is considered to be complete for requiring cleanup and water resource protection purposes.

3. Proposed Work Plan

A. The Regional Board agrees that groundwater monitoring should continue at the site; however, additional groundwater investigation, as indicated above, is also necessary to further refine the SCM and assist in closing the remaining data gaps and determining feasible groundwater remedial actions at the site.
B. By **April 15, 2015**, a revised work plan shall be submitted for our review and approval to install additional groundwater monitoring wells as specified in items 1A, 1B, and 1C above.

The new due date for submittal of technical report (revised work plan) each constitutes an amendment to the requirements of the California Water Code section 13267 Order originally dated December 12, 2008 and subsequent amendment dated October 31, 2012. All other aspects of the Order originally dated December 12, 2008, and amendments thereto, remain in full force and effect. The required technical reports are necessary to investigate the characteristics of and extent of the discharges of waste at the site and to evaluate cleanup alternatives. Therefore, the burden, including costs, of the reports bears a reasonable relationship to the need for the reports and benefits to be obtained. Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due dates may result in civil liability penalties administratively imposed by the Regional Board in an amount up to one thousand dollars ($1,000) for each day the technical report is not received.

If you have any questions, please contact Mr. Gregg Crandall (project manager) at (213) 576-6701 or gregg.crandall@waterboards.ca.gov.

Sincerely,

[Signature]

Samuel Unger, PE
Executive Officer

cc: Matthew Grode, Renaissance Home Owners Association (mgrode@gglts.com)
    Tiina Couture, PE, AECOM (Tiina.Couture@aecom.com)
    Chris Holmquist, Hollywood Park Land Company, LLC (holmquist@wilsonmeany.com)
    Jami Striegel Orloff, P.E., Erler & Kalinowski, Inc. (jstriegel@ekiconsult.com)
I, Tiina Couture, declare and state as follows:

1. I am Senior Project Manager for AECOM. Except as otherwise stated, I have personal knowledge of the matters stated herein and could testify to these facts if called upon to testify as a witness in this action.

2. Chevron Environmental Management Company, a California corporation ("Chevron EMC") retained AECOM to perform environmental work related to the Former Texaco Cypress Fee Property, 3000 90th Street, Inglewood, California (SCP No. 0084, Site ID No. 2040200) (the "Site").

3. I have been involved in the environmental work at the Site since May
2010, and am familiar with the historical and current environmental conditions at and in the vicinity of the Site.

4. I have evaluated the environmental data collected in and around the Site, as well as technical reports which have analyzed that data to determine if the Site would qualify for a low-threat closure under the State Water Resources Control Board’s Low-Threat Underground Storage Tank Case Closure Policy.

5. Site data demonstrate that the criteria of the State Board’s Low-Threat Underground Storage Tank Case Closure Policy have been satisfied, and thus there is no basis for the additional Site characterization or remediation.

6. Attached as Exhibit 1 is a true and correct copy of the Low-Threat Closure Policy Checklist I prepared for the Site showing that all criteria have been satisfied.


8. I estimate the cost to install the additional multi-depth wells to be $615,000.

9. I estimate the costs to abandon the additional multi-depth wells to be $180,000.

10. I estimate the cost to conduct semi-annual groundwater monitoring events for the additional multi-depth wells to be $45,000 per year.

I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct.

Dated this 16 day of March, 2015 in Camarillo, California.

Tiina Couture
EXHIBIT 1
Site Name: Former Texaco Cypress Fee  
Site Address: 3000 90th Street, Inglewood, California

Site meets the criteria of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<table>
<thead>
<tr>
<th>General Criteria</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>General criteria that must be satisfied by all candidate sites:</td>
<td></td>
</tr>
<tr>
<td>Is the unauthorized release located within the service area of a public water system?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Does the unauthorized release consist only of petroleum?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Has the unauthorized (“primary”) release from the UST system been stopped?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Has free product been removed to the maximum extent practicable?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Has secondary source been removed to the extent practicable?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</td>
<td>☒ Yes ☐ No</td>
</tr>
<tr>
<td>Does nuisance as defined by Water Code section 13050 exist at the site?</td>
<td>☐ Yes ☒ No</td>
</tr>
<tr>
<td>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</td>
<td>☐ Yes ☒ No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Media-Specific Criteria</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Candidate sites must satisfy all three of these media-specific criteria:</td>
<td></td>
</tr>
<tr>
<td>1. Groundwater:</td>
<td></td>
</tr>
<tr>
<td>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:</td>
<td></td>
</tr>
<tr>
<td>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</td>
<td>☒ Yes ☐ No ☐ NA</td>
</tr>
<tr>
<td>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</td>
<td>☒ Yes ☐ No ☐ NA</td>
</tr>
<tr>
<td>If YES, check applicable class: ☐ 1 ☐ 2 ☐ 3 ☒ 4 ☐ 5</td>
<td></td>
</tr>
</tbody>
</table>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.
For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?

| ☐ Yes | ☐ No | ☒ NA |

### 2. Petroleum Vapor Intrusion to Indoor Air:
The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.

**Is the site an active commercial petroleum fueling facility?**
Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.

- a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4?
  - If YES, check applicable scenarios: ☐ 1 ☐ 2 ☒ 3 ☐ 4

- b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?
  - ☒ Yes ☐ No ☒ NA

- c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?
  - ☐ Yes ☐ No ☒ NA

### 3. Direct Contact and Outdoor Air Exposure:
The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).

- a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?
  - ☒ Yes ☐ No ☐ NA

- b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?
  - ☐ Yes ☐ No ☒ NA

- c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?
  - ☐ Yes ☐ No ☒ NA
STATE WATER RESOURCES CONTROL BOARD
STATE OF CALIFORNIA

In the Matter of the Los Angeles Regional Water Quality Control Board’s February 13, 2015, Report Review Comments and For Additional Subsurface Investigations, Pursuant to California Water Code Section 13267 Order, Issued to CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY and Requiring Certain Action Related to the Former Texaco Cypress Fee Property, 3000 90th Street, Inglewood, California (SCP No. 0084, Site ID No. 2040200).

PETITION NO.

DECLARATION OF ALEXANDRA GALOVICH SUBMITTED WITH CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY’S PETITION FOR REVIEW, REQUEST FOR A HEARING, AND REQUEST FOR STAY

I, Alexandra Galovich, declare and state as follows:

1. I am a Senior Project Manager for Wilson Meany. Except as otherwise stated, I have personal knowledge of the matters stated herein and could testify to these facts if called upon to testify as a witness in this action.

2. I am informed and believe that on February 13, 2015, the Los Angeles Regional Water Quality Control Board issued a Report Review Comments and Requirements For Additional Subsurface Investigations, Pursuant to California Water Code Section 13267 Order, to Chevron Environmental Management Company (“Chevron EMC”) requiring the installation of additional groundwater wells on the Hollywood Park property.
3. Wilson Meany is the development manager and authorized agent for Hollywood Park Land Company, LLC (HPLC), which owns the Hollywood Park property. 

4. HPLC plans to redevelop the Hollywood Park property as a mixed-use development that includes commercial, entertainment, retail, and residential uses. I am informed and believe that the Regional Board is aware of Hollywood Park Land Company’s plans for a residential development of the Hollywood Park property. 

5. HPLC has an approved grading permit from the City of Inglewood for the entire Hollywood Park property, and has already commenced initial grading activities under that permit. 

6. HPLC and Chevron EMC have previously entered into an access agreement, which allowed Chevron EMC to install and sample groundwater wells on a portion of the Hollywood Park property. The access agreement also requires those wells to be removed and replaced when necessary to permit the Hollywood Park property to be redeveloped. 

7. There are two options for the redevelopment of the Hollywood Park property. Under either option, however, HPLC intends to redevelop the portion of the Hollywood Park property where Chevron EMC previously installed monitoring wells. I am informed and believe that the new wells required by the Regional Board would be in this area. 

8. Grading and soil excavation for the residential development to be constructed in the portion of the Hollywood Park property where the new wells are required to be installed could begin as early as the fourth quarter of 2015, depending on which development option is selected. 

9. All wells installed by Chevron EMC on this portion of the Hollywood Park property would need to be removed before soil disturbing activities could begin. 

10. It will be necessary for Chevron EMC and Hollywood Park Land Company to coordinate and reach an agreement as to the location of any wells that would need to be reinstalled at the Hollywood Park property after ground disturbing activities.
and potentially other construction activities have been completed.

I declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct.

Dated this 16th day of March, 2015 in San Francisco, California.

[signature]

Alexandra Galovich
ROGERS JOSEPH O'DONNELL, PC
ROBERT C. GOODMAN (State Bar No. 111554)
rgoodman@rjo.com
NICHOLAS T. NIIRIO (State Bar No. 281762)
niiro@rjo.com
311 California Street
San Francisco, California 94104
Telephone: 415.956.2828
Facsimile: 415.956.6457

Attorneys for Petitioner
CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY

STATE WATER RESOURCES CONTROL BOARD
STATE OF CALIFORNIA

In the Matter of the Los Angeles Regional Water Quality Control Board's February 13, 2015, Report Review Comments and Requirements For Additional Subsurface Investigations, Pursuant to California Water Code Section 13267 Order, Issued to CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY and Requiring Certain Action Related to the Former Texaco Cypress Fee Property, 3000 90th Street, Inglewood, California (SCP No. 0084, Site ID No. 2040200).

PETITION NO.

PROOF OF SERVICE

I, Clara Chun, declare that I am over 18 years of age and not a party to the within action. I am employed in San Francisco County at 311 California Street, 10th Floor, San Francisco, CA 94104.

On March 16, 2015, I served the following documents:

CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY'S PETITION FOR REVIEW, REQUEST FOR A HEARING, AND REQUEST FOR STAY

DECLARATION OF TIINA COUTURE IN SUPPORT OF CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY'S PETITION FOR REVIEW, REQUEST FOR A HEARING, AND REQUEST FOR STAY

DECLARATION OF TODD LITTLEWORTH IN SUPPORT OF CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY’S PETITION FOR REVIEW, REQUEST FOR A HEARING, AND REQUEST FOR STAY
DECLARATION OF ALEXANDRA GALOVICH SUBMITTED WITH CHEVRON
ENVIRONMENTAL MANAGEMENT COMPANY’S PETITION FOR REVIEW, REQUEST FOR A HEARING, AND REQUEST FOR STAY

Samuel Unger, PE
Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013
sunger@waterboards.ca.gov

Gregg Crandall
Project Manager
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013
gregg.crandall@waterboards.ca.gov

Matthew Grode
Renaissance Home Owners Assn.
Gibs Giden
7450 Arroyo Crossing Parkway, Suite 270
Las Vegas, NV 89113
mgrode@gglts.com

Tiina Couture
AECOM Technology Corporation
1220 Avenida Acaso
Camarillo, CA 93012
tiina.couture@aecom.com

Alexandra Galovich
Wilson Meany
Four Embarcadero Center, Suite 3330
San Francisco, CA 94111
agalovich@wilsonmeany.com

Chris Holmquist
Hollywood Park Land Company, LLC
Wilson Meany
6100 Center Drive, Suite 1020
Los Angeles, CA 90045
holmquist@wilsonmeany.com

Jami Striegel Orloff, PE
Erler & Calinowski, Inc.
1870 Ogden Drive
Burlingame, CA 94010
jstriegel@ekiconsult.com

Christopher J. Penza
Project Manager
Chevron Environmental Management Company
9525 Camino Media
Bakersfield, CA 93311
cpenza@chevron.com

BY FIRST CLASS MAIL: I am readily familiar with my firm’s practice for collection and processing of correspondence for mailing with the United States Postal Service, to-wit, that correspondence will be deposited with the United States Postal Service this same day in the ordinary course of business. I sealed said envelope and placed it for collection and mailing on March 16, 2015, following ordinary business practices.

BY ELECTRONIC SERVICE: I caused the documents to be sent to the person(s) at the electronic notification address(es) listed above. Within a reasonable time, the transmission was reported as complete and without error.

PROOF OF SERVICE
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed this date at San Francisco, California.

Dated: March 16, 2015

Clara Chun