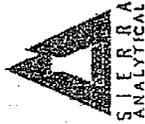


Product Characteristics



Los Angeles County Dept. of Public Works
900 S. Fremont Ave.
Alhambra CA, 91803

Project: Dominguez Channel
Project Number: PCA:F06060278
Project Manager: Gregory Sena

Total Petroleum Hydrocarbons Carbon Range Analy

Sierra Analytical Labs, Inc.

Analyte	Result	Reporting Limit	Units	Dilution	Batch
---------	--------	-----------------	-------	----------	-------

DC-1 (1102183-01) Liquid Sampled: 02/11/11 12:30 Received: 02/11/11 15:30

HC < C8	400	400	mg/L	400	B1B0906	02/14/11	02/14/11 17:37	EEA 8015B
C8 <= HC < C9	6400	400	"	"	"	"	"	"
C9 <= HC < C10	6100	400	"	"	"	"	"	"
C10 <= HC < C11	4900	400	"	"	"	"	"	"
C11 <= HC < C12	2800	400	"	"	"	"	"	"
C12 <= HC < C14	2200	400	"	"	"	"	"	"
C14 <= HC < C16	400	400	"	"	"	"	"	"
C16 <= HC < C18	ND	400	"	"	"	"	"	"
C18 <= HC < C20	ND	400	"	"	"	"	"	"
C20 <= HC < C24	ND	400	"	"	"	"	"	"
C24 <= HC < C28	ND	400	"	"	"	"	"	"
C28 <= HC < C32	ND	400	"	"	"	"	"	"
HC >= C32	ND	400	"	"	"	"	"	"
Total Petroleum Hydrocarbons (C7-C36)	23000	2000	"	"	"	"	"	"

Primarily gasoline- and jet fuel-range hydrocarbons in channel sample DC-1.

Surrogate: o-Terphenyl

% 60

Hydrocarbon Ranges

Gasoline C₄-C₁₂

Jet Fuel C₇-C₁₆

Diesel C₁₃-C₂₅





Product Characteristics

United States Coast Guard
Marine Safety Laboratory
Oil Spill Identification Report
11-125

Requestor: U. S. EPA Region IX

Unit Case/Activity Number: E11908

Received: 15-Feb-11

Via: Federal Express 8710 1056 5463

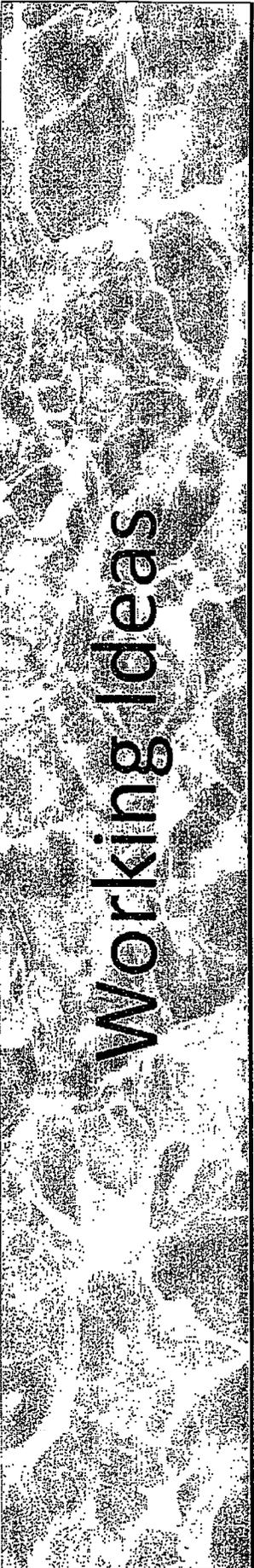
RESULTS:

1. Sample 11-125-1 was specified to be representative of spilled oil. Analysis indicates this sample contains gasoline mixed with traces of heavier petroleum oil. It is not possible based on the analysis conducted to determine if the heavier petroleum product is lubricating oil or a degraded fuel oil due to the limited quantity of product in the sample.



Product Characteristics

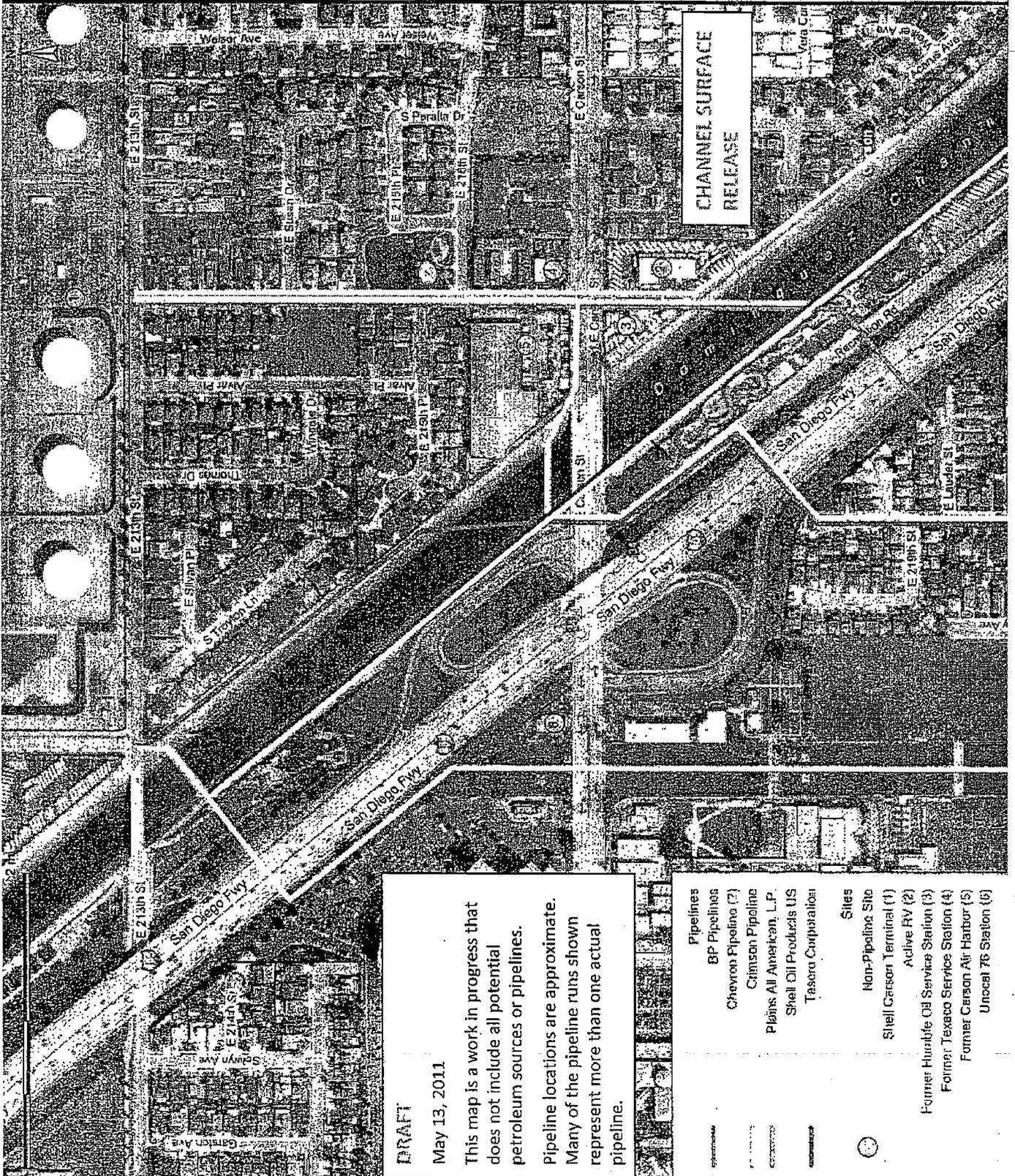
- Summary
 - Gasoline;
 - Jet Fuel or Diesel (?); and/or
 - Heavier Oil (?).



Working Ideas

- LNAPL flowing through pipeline trench on east side of channel (Active RV side)
 - Proven negative by excavation at Active RV site
- LNAPL entering subdrains and getting under channel
 - Mechanism unknown
- Groundwater plume
 - Groundwater elevation rise exposed LNAPL to channel bottom and subdrains
 - One or more petroleum release sources

Dominguez Channel Release Vicinity Facilities



DRAFT

May 13, 2011

This map is a work in progress that does not include all potential petroleum sources or pipelines.

Pipeline locations are approximate. Many of the pipeline runs shown represent more than one actual pipeline.

- | | |
|---------------------------|---------------------------------------|
| Pipelines | Sites |
| BP Pipelines | Non-Pipeline Site |
| Chevron Pipeline (?) | Shell Carson Terminal (1) |
| Crimson Pipeline | Active RV (2) |
| Plains All American, L.P. | Former Humble Oil Service Station (3) |
| Shell Oil Products US | Former Texaco Service Station (4) |
| Tasora Corporation | Former Carson Air Harbor (5) |
| | Unocal 76 Station (6) |



Assessment Goals

1. Physical subsurface sampling to fully delineate soil, **groundwater**, and soil gas impact around petroleum infrastructure and the Dominguez Channel.

- LNAPL
- Other petroleum (dissolved phase, soil gas, etc.)
- Other contaminants (?)
- Full lateral and vertical extents
- Connection to bottom of channel
- Connection to subdrains
 - Transport along subdrains



Assessment Goals

2. Gain an understanding of the subsurface conditions delivering LNAPL to the channel bottom and the levee subdrains.
3. Determine whether individual petroleum infrastructures are contributing to the Dominguez Channel release.



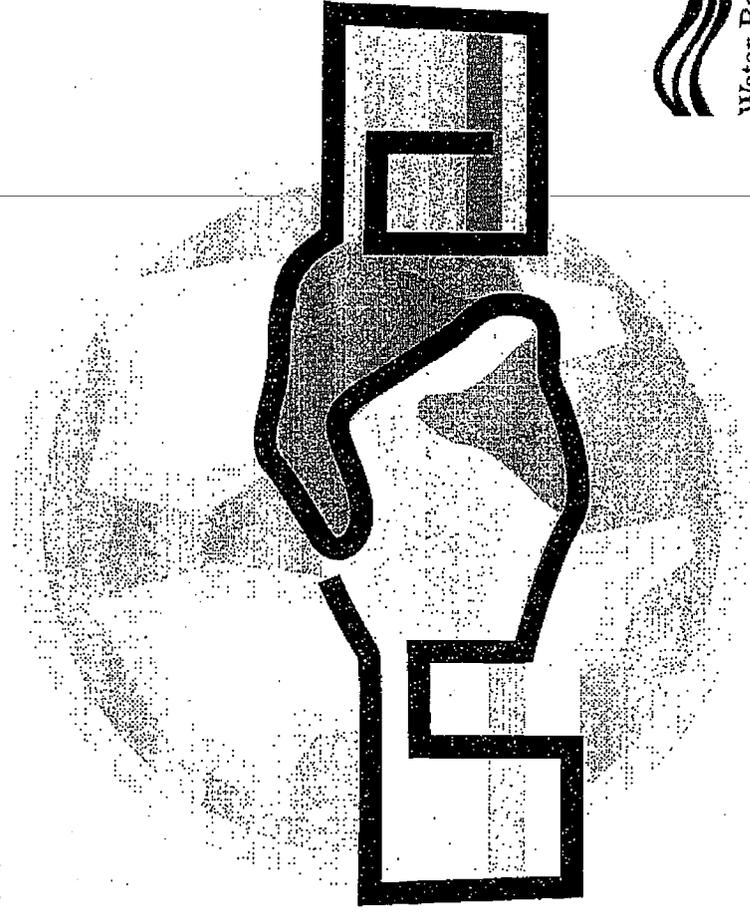
Assessment Goals

4. Complete sufficient assessment to design a remediation approach.

Assessment Goals

5. Collaborate to improve efficiency to achieve Goals 1 to 4.

- Faster results
- Better results
- Lower costs



Regional Board Contact

Greg Bishop, P.G.
Engineering Geologist

LARWQCB
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

(213) 576-6727
gbishop@waterboards.ca.gov

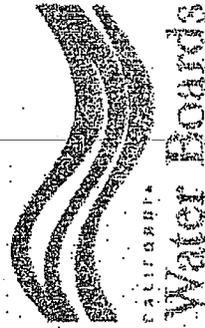


EXHIBIT 4



California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

320 West Fourth Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

May 17, 2011

Mr. Gary Hildebrand
Assistant Deputy Director
Los Angeles County Department of Public Works
900 S. Fremont Avenue
Alhambra, CA 91803

**SUBJECT: CLEANUP AND ABATEMENT ORDER NO. R4-2011-0065
PURSUANT TO CALIFORNIA WATER CODE SECTION 13304**

**SITE/CASE: DOMINGUEZ CHANNEL, SOUTH OF CARSON STREET
CARSON, CALIFORNIA (SCP NO. 1058; FILE NO. 11-061)**

Dear Mr. Hildebrand:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles County and Ventura County, including the above-referenced site. I am in receipt of your letter dated April 28, 2011, which replies to the Regional Board's directive under the Municipal Separate Storm Sewer System Permit dated April 15, 2011, to develop a plan to remove hydrocarbons from County of Los Angeles Flood Control District's (LAFCD) subdrain systems that have been observed to be discharging waste into Dominguez Channel. Your letter notes that you will not develop a plan until you gain further understanding to determine "if there is a connection between LNAPL found in the subdrains and the LNAPL found in the submerged channel sediment release area".

I understand and share your concerns regarding potential light non-aqueous phase liquid (LNAPL) sources from groundwater and the Regional Board has issued eight investigative orders to responsible parties in the vicinity of the LNAPL discharge. The Regional Board will certainly share the work plans and results from the groundwater investigations with you. However, I am surprised that your response did not provide a plan to remove LNAPL from the subdrain systems. I met with you prior to issuing the directive and you informed me that the LAFCD understood the necessity of addressing LNAPL in the subdrain, which LAFCD owns and operates. The Regional Board continues to find that LNAPL removal from the subdrain and groundwater investigation should proceed independently and simultaneously to address the issues of LNAPL discharge to Dominguez Channel.

Consequently, enclosed is Cleanup and Abatement Order No. R4-2011-0065 (CAO), directing the LAFCD to assess, monitor, cleanup the waste, and abate the effects of the ongoing discharge of LNAPL and any other wastes within the Dominguez Channel, approximately 400 feet south of Carson Street in Carson, California. More specifically, the CAO requires a work plan for initial extraction of petroleum hydrocarbons from the subdrain system; a work plan to perform the evaluation proposed by LAFCD; a

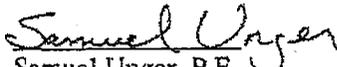
California Environmental Protection Agency

May 17, 2011

work plan to revise the subdrain extraction techniques based upon the evaluation results; if appropriate, a work plan to implement remedial action on contaminants that may have migrated within the subdrain system, possibly onto other properties; and reporting for existing and other future sampling work performed by LAFCD. This Order is issued pursuant to section 13304 of the California Water Code.

Should you have any questions, please contact Mr. Greg Bishop at (213) 576-6727 or gbishop@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Cc: Mr. Lalo Bakhoun, South Coast Air Quality Management District
Mr. Christian Corbo, California Department of Fish and Game
Mr. Mario Benjamin, Los Angeles County Fire Department
Mr. Hector Bordas, Los Angeles County Department of Public Works
Mr. James Flynn, The Carson Companies
Mr. Bob Gorham, Cal Fire
Ms. Sheri Repp Loadsman, City of Carson
Mr. Martin Powell, United States Environmental Protection Agency
Ms. Diane Wachi, City of Carson

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

CLEANUP AND ABATEMENT ORDER NO. R4-2011-0065
REQUIRING

COUNTY OF LOS ANGELES

FLOOD CONTROL DISTRICT

TO CLEANUP WASTE AND ABATE THE EFFECTS OF WASTE
DISCHARGED TO WATERS OF THE STATE
PURSUANT TO CALIFORNIA WATER CODE SECTION 13304
AT THE DOMINGUEZ CHANNEL
CARSON, CALIFORNIA

(CASE NO. 1258; FILE NO. 11-061)

This Cleanup and Abatement Order No. R4-2011-0065 (Order) is issued to the County of Los Angeles Flood Control District (LAFCD, hereinafter, the "Discharger") based on provisions of California Water Code sections 13304 and 13267, which authorizes the Regional Water Quality Control Board, Los Angeles Region (Regional Board) to issue a Cleanup and Abatement Order and require the submittal of technical and monitoring reports. This Order requires LADPW to cleanup and abate the discharges of petroleum hydrocarbons to the Dominguez Channel and observed within the sub-drain pipe system located in the Dominguez Channel levees (hereinafter, the "Site") located southeast of East Carson Street in Carson, California.

The Regional Board herein finds:

BACKGROUND

1. **Location:** Petroleum hydrocarbons have discharged, and continue to discharge, into a segment of the Dominguez Channel in Carson, California, approximately 400 feet south of East Carson Street, east of Recreation Road (that is adjacent to the former Go Kart World business at 21830 Recreation Road), and west of the former Active RV business (located at 1152 East Carson Street).
2. **Discharger:** LAFCD is operated under the authority and responsibility of the County of Los Angeles Department of Public Works. LAFCD owns the infrastructure of the Dominguez Channel, through which wastes are discharging, and operates the Channel pursuant to a long-term lease with the property owners. As the owner and operator of this infrastructure, LAFCD is a Responsible Party and is required to contain and clean up the petroleum hydrocarbons in the channel and channel infrastructure (including the sub-drain piping) and prevent further discharges of the petroleum hydrocarbons. LAFCD is also a permittee under Waste Discharge Requirements Order No. 01-182, the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit. Section 4.G of the MS4 permit, Illicit Connections and Illicit Discharges

Elimination Program, requires the LAFCD to respond to the discovery of an illicit discharge with activities to clean up all illicit discharges.

3. **Water Quality Control Plan:** The Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) designates beneficial uses, establishes water quality objectives to protect those uses, and includes implementation programs to attain the water quality objectives.
4. **Groundwater Basin:** The Site is located on the Torrance Plain of the West Coast Groundwater Basin (Basin), in the southwestern part of the Coastal Plain of Los Angeles County. Beneath the Site, the first encountered groundwater is approximately at 5 feet below ground surface (bgs). As described in the Basin Plan, the Basin is underlain by a series of aquifers, the deeper of which are used for drinking water production. These aquifers are with increasing depth, the Gage aquifer, Lynwood aquifer, and Silverado aquifer. The designated beneficial uses set forth in the Basin Plan include municipal, industrial, process, and agricultural supply uses.
5. **Surface Water Basin:** This Site is located in the Dominguez Channel, which is a surface water of the state and of the United States that flows to the Estuary. The designated beneficial uses of the Dominguez Channel as set forth in the Basin Plan include contact and non-contact recreation and estuarine, marine, wildlife, and rare and endangered species habitat.
6. As detailed in the findings below, the Discharger's activities at the Site have caused or permitted the discharge of waste resulting in pollution and nuisance or threat of pollution or nuisance in Dominguez Channel, including discharges of waste to the waters of the state.

SITE HISTORY

7. Since January 2011, light non-aqueous phase liquid (LNAPL) has been appearing within the Dominguez Channel in Carson, California, approximately 400 feet south of East Carson Street. The product has been observed (1) entering into channel waters from sediments within the bottom of the channel and (2) within horizontal, perforated sub-drain pipe systems installed within both the west and east channel levees. The LNAPL within the sub-drain pipe systems has been observed discharging into the channel waters.
8. This Regional Board has been working under United States Environmental Protection Agency (USEPA) lead to facilitate the assessment and remedy to the discharges of waste. As the channel owner and operator, the LAFCD has been performing containment operations using booms and absorbent pads in the channel. In addition to the recovery of petroleum hydrocarbons discharged to channel waters, this Regional Board has requested that LADPW extract LNAPL from the sub-drain piping systems on both sides of the channel. The Regional Board's initial request was made verbally to LAFCD personnel on March 3, 2011. The Regional Board sent a written request to the LAFCD on April 15, 2011.

AUTHORITY - LEGAL REQUIREMENTS

9. Section 13304(a) of the California Water Code provides that:

"Any person who has discharged or discharges waste into waters of the state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including but not limited to, overseeing cleanup and abatement efforts. Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the regional board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant."

10. Section 13267(b)(1) of the California Water Code provides that:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

11. Section 13304(c)(1) of the California Water Code provides that:

". . . the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), are liable to that government agency to the extent of the reasonable costs actually incurred in cleaning up the waste, abating the effects of the waste, supervising cleanup or abatement activities, or taking other remedial actions. . ."

12. The State Water Resources Control Board (hereafter State Water Board) has adopted Resolution No. 92-49, the Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304. This Policy sets forth the policies and procedures to be used during an investigation or cleanup of a polluted site. Resolution 92-49 and the Basin Plan establish the cleanup levels to be achieved. Resolution 92-49 requires the waste to be cleaned up to background, or if that is not reasonable, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with Title 23, California Code of Regulations (CCR) Section 2550.4. Any alternative cleanup level to background must: (1) be consistent with the maximum

benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Water Board. Resolution 92-49 directs that investigation proceed in a progressive sequence. To the extent practical, it directs the Regional Water Board to require and review for adequacy written work plans for each element and phase, and the written reports that describe the results of each phase, of the investigation and cleanup.

EVIDENCE OF DISCHARGES OF WASTE AND BASIS FOR ORDER

13. Samples of petroleum hydrocarbons entering channel waters from sediments in the bottom of the channel have been analyzed by USEPA and determined to contain primarily gasoline-range hydrocarbons, with smaller fractions of heavier-end (diesel- and oil-range) hydrocarbons. Petroleum hydrocarbons examined from the western sub-drain system was observed to be approximately 0.25 inch thick on one occasion with a clear and colorless appearance. Petroleum hydrocarbons examined from the eastern sub-drain system was observed to be dark brown to black and translucent.
14. The constituents found at the Site as described in Finding 5 constitute "waste" as defined in Water Code section 13050(d). The discharge of waste has resulted in pollution, as defined in Water Code section 13050(i). The presence of petroleum hydrocarbons in the Dominguez Channel exceeds Water Quality Objectives for Inland Surface Waters in the Basin Plan, including the prohibition on discharge of oil and grease and taste and odor. The concentration of waste constituents in soil and groundwater exceed water quality objectives contained in the Basin Plan, including maximum contaminant levels (MCLs). The presence of petroleum hydrocarbons is harmful to aquatic life and human health, resulting in impacts to the designated beneficial uses and pollution. The presence of waste at the Site constitutes a "nuisance" as defined in Water Code section 13050(m). The waste is present at concentrations and locations that *"is injurious to health, or is indecent, or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property . . . and [affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal."* Individuals in the vicinity of the Dominguez Channel have observed odors and other impacts due to the discharge of waste.
15. **Need for Technical Reports:** This Order requires the submittal of technical or monitoring reports pursuant to Water Code section 13267². The Discharger is required to submit the reports because, as described in the Findings in this Order, the Discharger is responsible for the discharge of waste that has caused, or threatens to cause, pollution and nuisance. The reports are necessary to evaluate the extent of the impacts on water quality and public health and to determine the scope of the remedy. As noted in Finding 8, LAFCD has been conducting containment operations and has the information identifying the nature of the discharges of waste. The Regional Board's records contain additional information concerning the ownership and operation of the infrastructure under the control of the LADPW.

² Water Code section 13267 authorized the Regional Board to require any person who has discharged, discharges, or is suspect of having discharged or discharging, waste to submit technical or monitoring program reports.

CONCLUSION

16. **Pollution of Waters of the State:** The Discharger has caused or permitted waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance. As described in this Order and the record of the Regional Board, the Discharger owned and/or operated the Site in a manner that resulted in the discharges of waste.
17. Although requested by the Discharger, the Regional Board is declining to name additional potentially responsible parties (PRPs) in this Order at this time. Substantial evidence indicates that the Discharger caused or permitted waste to be discharged into waters of the state and is therefore appropriately named as a responsible party in this Order. The Regional Board will continue to investigate whether additional PRPs (including, but not limited to, Chevron Pipeline (former Union Oil Pipeline), Chevron Environmental Management Company (former Texaco gasoline station), ConocoPhillips, Crimson Pipeline, Shell Oil Products US, Tesoro, Prowell Family Trust, and BP Pipelines) caused or permitted the discharge of waste at the Site and whether these or other persons should be named as additional responsible parties to this Order. The Regional Board has issued orders pursuant to Water Code 13267 to the owners of pipelines and other petroleum facilities in the vicinity of the Dominquez Channel that may be contributing to the discharges of petroleum hydrocarbons at the Site. The Regional Board may amend this Order or issue a separate order or orders in the future as a result of this investigation. Although investigation concerning additional PRPs is ongoing, the Regional Board desires to issue this Order as waiting will only delay remediation of the Site.
18. Issuance of this Order is being taken for the protection of the environment and as such is exempt from provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, title 14, sections 15061(b)(3), 15306, 15307, 15308, and 15321. This Order generally requires the Discharger to submit plans for approval prior to implementation of cleanup activities at the Site. Mere submittal of plans is exempt from CEQA as submittal will not cause a direct or indirect physical change in the environment and/or is an activity that cannot possibly have a significant effect on the environment. CEQA review at this time would be premature and speculative, as there is simply not enough information concerning the Discharger's proposed remedial activities and possible associated environmental impacts. If the Regional Board determines that implementation of any plan required by this Order will have a significant effect on the environment, the Regional Board will conduct the necessary and appropriate environmental review prior to Executive Officer approval of the applicable plan.
19. Pursuant to section 13304 of the California Water Code, the Regional Board may seek reimbursement for all reasonable costs to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action.
20. Any person aggrieved by this action of the Regional Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a

Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

This Order is issued by the Executive Officer pursuant to authority delegated by the Regional Board. The Discharger may seek reconsideration by the Regional Board. Note, however, that if the Discharger fails to file a petition within 30 days, in accordance with the State Water Board regulations, the Discharger will lose its right to review of this Order by the State Water Board.

THEREFORE, IT IS HEREBY ORDERED, pursuant to California Water Code sections 13304 and 13267, that the County of Los Angeles Flood Control District shall cleanup the waste and abate the effects of the discharge of waste, including, but not limited to, petroleum hydrocarbons and other wastes discharged to waters of Dominguez Channel in accordance with the following requirements:

1. Continue containment and recovery operations within the channel of petroleum hydrocarbons discharging into the channel. Adjustments to the recovery system may be made in coordination with Regional Board staff, provided that such adjustments are deemed to be effective in achieving containment goals.
2. By **May 31, 2011**, develop an interim remedial action plan (IRAP), including a proposed schedule, to remove and legally dispose of petroleum hydrocarbons within both channel sub-drain systems. The IRAP shall be prepared with the goals of (a) preventing petroleum hydrocarbons within the sub-drain piping from entering the channel and (b) preventing migration of product within the sub-drain piping to other locations. The plan shall include:
 - a. a map indicating where petroleum hydrocarbons have been detected within the sub-drains;
 - b. a map showing planned extraction locations;
 - c. a description of how extraction will be performed; and
 - d. a proposed schedule for periodic status report submittals to this Regional Board describing the sub-drain extraction activities.

After approval by the Regional Board Executive Officer, implement the work plan and report results in accordance with the approved work plan schedule.

3. By **June 8, 2011**, you are required to submit a work plan to accomplish an evaluation of the subdrain system. Specifically, the work plan shall:
 - a. propose techniques to evaluate whether the subdrains are providing a conduit for LNAPL from offsite sources or if the subdrains are recirculating LNAPL originating from the submerged channel sediments;
 - b. propose a technique to determine the lateral extent of the LNAPL-impacted subdrains;
 - c. propose a technique to determine the extent of soil, groundwater, and soil vapor impact from LNAPL and other waste constituents transported within the subdrain system;
 - d. include a provision to modify the IRAP for petroleum hydrocarbon recovery efforts within the subdrain system based upon investigation results;

- e. include a provision to prepare an additional work plan to remediate soil, groundwater, and soil vapor that may have been impacted due to petroleum hydrocarbon transport within the subdrain systems; and
- f. include a proposed schedule for implementation of the proposed tasks and for submittal of reports for these tasks to the Regional Board.

After approval by the Regional Board Executive Officer, implement the work plan and report results in accordance with the approved work plan schedule.

4. The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker data management system. You are required not only to submit hard copy reports required in this Order, but also to comply by uploading all reports and correspondence prepared to date and additional required data formats to the GeoTracker system. Information about GeoTracker submittals, including links to text of the governing regulations, can be found on the Internet at the following link:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

5. The Regional Board's authorized representative(s) shall be allowed:
 - a. Entry upon premises where a regulated facility or activity is located, conducted, or where records are stored, under the conditions of this Order;
 - b. Access to copy any records that are maintained under the conditions of this Order;
 - c. Access to inspect any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
 - d. The right to photograph, sample, and monitor the Site for the purpose of ensuring compliance with this Order, or as otherwise authorized by the California Water Code.
6. **Contractor/Consultant Qualification:** A California licensed professional civil engineer or geologist, or a certified engineering geologist or hydrogeologist shall conduct or direct the subsurface investigation and cleanup program. All technical documents required by this Order shall be signed by and stamped with the seal of the above-mentioned qualified professionals.
7. This Order is not intended to permit or allow the Discharger to cease any work required by any other Order issued by this Regional Board, nor shall it be used as a reason to stop or redirect any investigation or cleanup or remediation programs ordered by this Regional Board or any other agency. Furthermore, this Order does not exempt the Discharger from compliance with any other laws, regulations, or ordinances which may be applicable, nor does it legalize these waste treatment and disposal facilities, and it leaves unaffected any further restrictions on those facilities which may be contained in other statutes or required by other agencies.
8. The Regional Board, through its Executive Officer or other delegate, may revise this Order as additional information becomes available. Upon request by the Discharger, and for good cause shown, the Executive Officer may defer, delete or extend the date of compliance for any action required of the Discharger under this Order. The authority of the Regional Board, as contained in the California Water Code, to order investigation and cleanup, in addition to that described herein, is in no way limited by this Order.

9. Failure to comply with the terms or conditions of this Order may result in imposition of civil liabilities, imposed either administratively by the Regional Board or judicially by the Superior Court in accordance with Sections 13268, 13308, and/or 13350, of the California Water Code, and/or referral to the Attorney General of the State of California.
10. None of the obligations imposed by this Order on the Discharger are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of California intended to protect the public health, safety, welfare, and environment.

Ordered by: Samuel Unger
Samuel Unger, P.E.
Executive Officer

Date: May 17, 2011

1 AMY E. GAYLORD (SBN 217553)
PILLSBURY WINTHROP SHAW PITTMAN LLP
2 50 Fremont Street
San Francisco, CA 94105
3 Telephone: (415) 983-1000
Facsimile: (415) 983-1200
4 E-mail: amy.gaylord@pillsburylaw.com

5 Attorneys for Petitioner,
CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY
6
7

8 STATE WATER RESOURCES CONTROL BOARD
9

10 In the Matter of the California Regional
Water Quality Control Board – Los Angeles
11 Region Requirement to Provide a Technical
Report on Soil and Groundwater
12 Investigation (California Water Code Section
13 13267 Order) Directed to “ConocoPhillips
Company”; 76 Service Station, 1025 E.
14 Carson Street, Carson, California (UST Case
No. I 02903)

PROOF OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I am employed in the City of San Francisco, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of 18 years, and not a party to the within action. My business address is Pillsbury Winthrop Shaw Pittman LLP, 50 Fremont Street, San Francisco, CA 94105-2228. My mailing address is 50 Fremont Street, P.O. Box 7880, San Francisco, CA 94120-7880. On May 26, 2011, I served the document(s) titled:

- **CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY'S PETITION FOR REVIEW, REQUEST FOR HEARING, AND REQUEST FOR STAY**
- **DECLARATION OF AMY E. GAYLORD IN SUPPORT OF CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY'S PETITION FOR REVIEW, REQUEST FOR HEARING, AND REQUEST FOR STAY**
- **DECLARATION OF IAN ROBB IN SUPPORT OF CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY'S PETITION FOR REVIEW, REQUEST FOR HEARING, AND REQUEST FOR STAY**

on the parties in this action as follows:

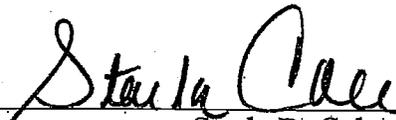
[See Attached Service List]

- (BY MAIL)** I caused each envelope, with postage thereon fully prepaid, to be placed in the United States mail at San Francisco, CA. I am readily familiar with the practice of Pillsbury Winthrop Shaw Pittman LLP for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.
- (BY FACSIMILE)** The above-referenced document(s) was transmitted by facsimile transmission and the transmission was reported as complete and without error to the number(s) listed below.
- (BY EMAIL TRANSMISSION)** The above-referenced document(s) was transmitted via electronic transmission to the person(s) at the electronic-email address(es) indicated below.
- (BY PERSONAL SERVICE)** I delivered to an authorized courier or driver authorized by _____ to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed forthwith.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(BY OVERNIGHT COURIER) I am readily familiar with the practice of Pillsbury
Winthrop Shaw Pittman LLP for collection and processing of correspondence for
overnight delivery and know that the document(s) described above will be deposited in
a box or other facility regularly maintained by _____ for overnight delivery.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on May 26, 2011, at San Francisco, California.


Starla D. Cole

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SERVICE LIST

Sam Unger Greg Bishop California Regional Water Quality Control Board – Los Angeles Region 320 West Fourth Street, Suite 200 Los Angeles, CA 90013 Ph: (213) 576-6600 Fax: (213) 576-6640	Mike Romley Crimson Pipeline 2459 Redondo Avenue Long Beach, CA 90755 Ph: (562) 595-9463 E-mail: mjromley@crimsonpl.com
Eugene Freed Shell Oil Products U.S. 20945 S. Wilmington Avenue Carson, CA 90810-1039 Ph: (818) 991-5356 E-mail: eugene.freed@shell.com	Daniel Gabel Tesoro Corporation 1930 E. Pacific Coast Highway Wilmington, CA 90744 Ph: (310) 522-8602
Courtland Prowell 3997 Mistral Road Huntington Beach, CA 92649 E-mail: rcprowell@gmail.com	Donna Diracho BP Pipelines 1300 Pier B Street Long Beach, CA 90813 E-mail: donna.dirocco@bp.com