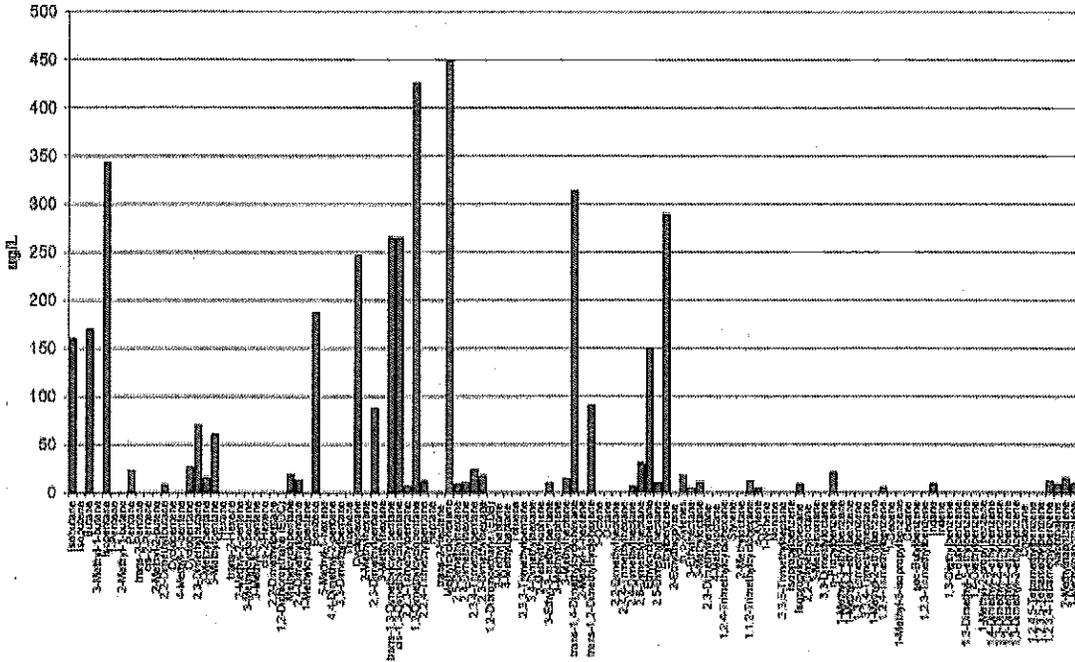
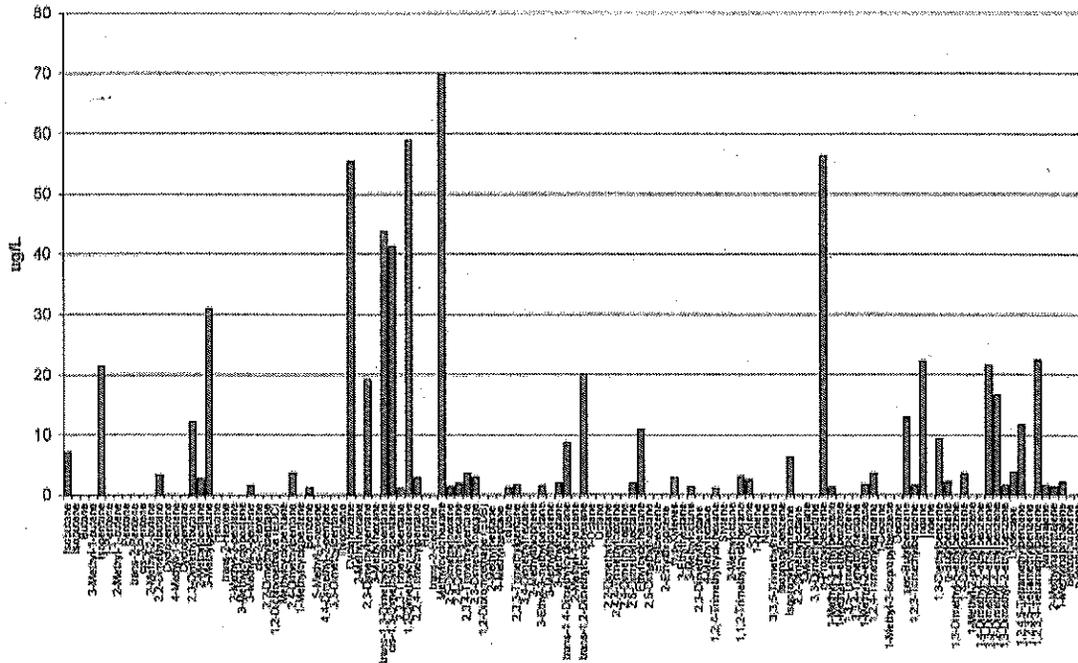


MW-10R

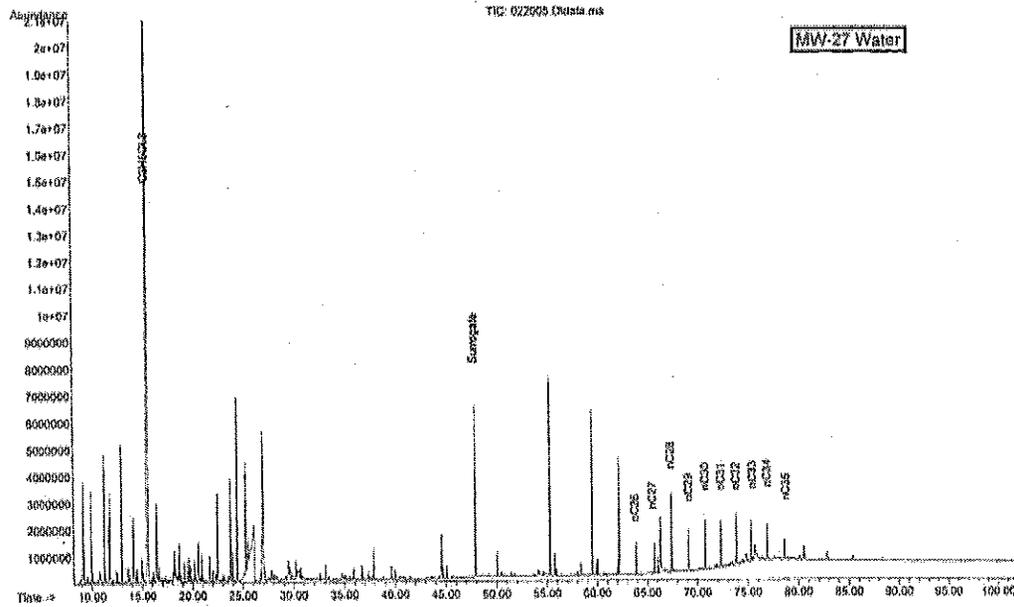
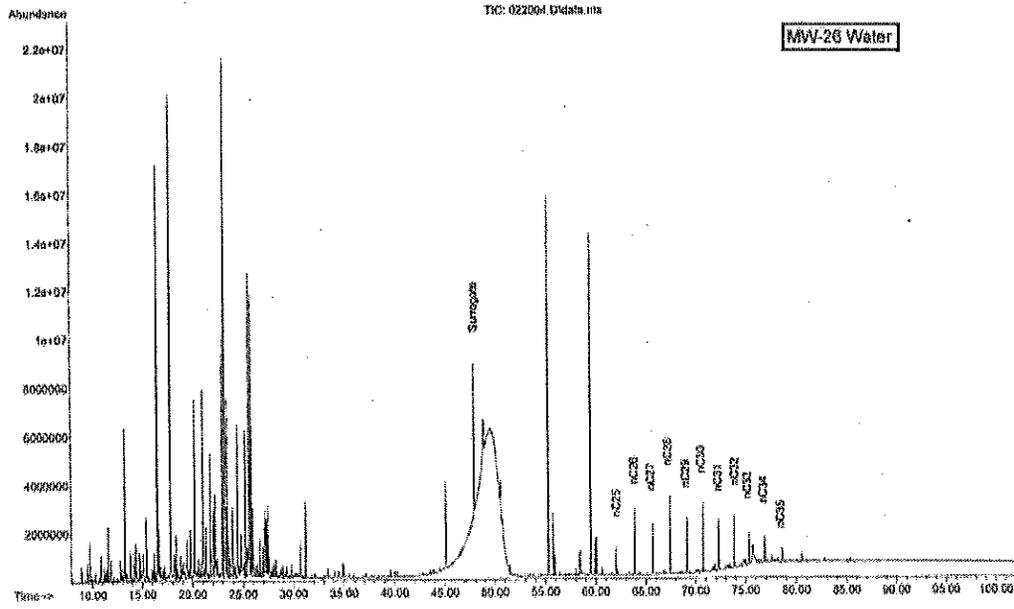


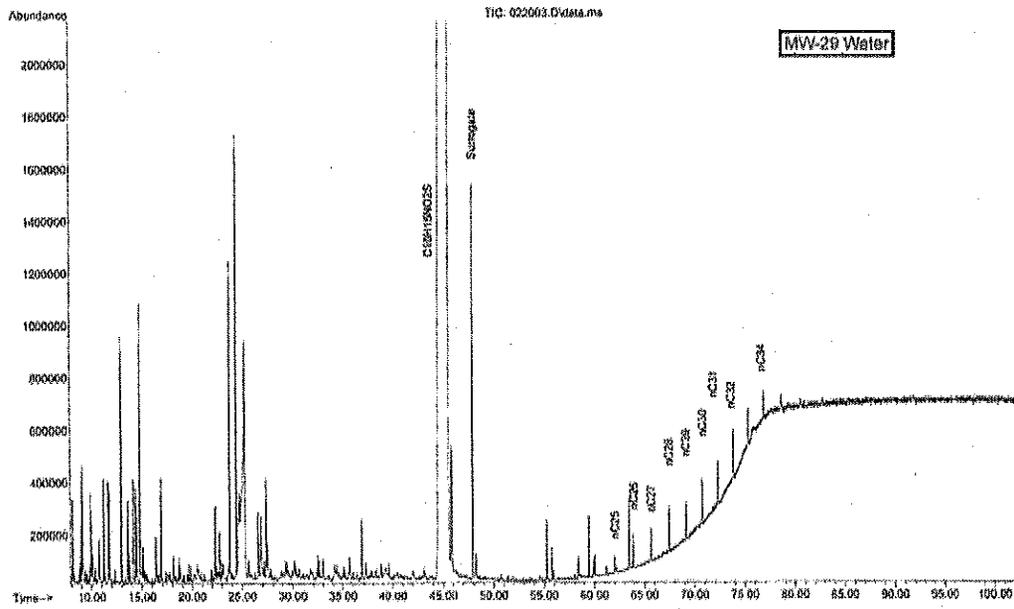
MW-26













AMERICAN SCIENTIFIC LABORATORIES, LLC  
*Environmental Testing Services*

2520 N. San Fernando Rd., Los Angeles, CA 90065 Tel: (323) 223-9700 Fax: (323) 223-9500

Ordered By

SCS Engineers  
3900 Kilroy Airport Way #100  
Long Beach, CA 90806-

Number of Pages 14  
Data Received 02/12/2014  
Date Reported 02/17/2014

Telephone (562)426-9574  
Attn Bob Gutzler

Job Number	Ordered	Client
59849	02/12/2014	SCS-LB

Project ID:  
Project Name: Port DC

Enclosed are the results of analyses on 5 samples analyzed as specified on attached chain of custody.

Wendy Lu  
Organics Supervisor

American Scientific Laboratories, LLC (ASL) accepts sample materials from clients for analysis with the assumption that all of the information provided to ASL verbally or in writing by our clients (and/or their agents), regarding samples being submitted to ASL, is complete and accurate. ASL accepts all samples subject to the following conditions:

- 1) ASL is not responsible for verifying any client-provided information regarding any samples submitted to the laboratory.
- 2) ASL is not responsible for any consequences resulting from any inaccuracies, omissions, or misrepresentations contained in client-provided information regarding samples submitted to the laboratory.



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 Environmental Testing Services

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COC# N° 67674 GLOBAL ID \_\_\_\_\_ E REPORT:  PDF  EDF  EDD ASL JOB# 59849

LAB USE ONLY		SAMPLE DESCRIPTION				CONTAINER(S)		ANALYSIS REQUESTED				REMARKS			
LAB ID	SAMPLE ID	DATE	TIME	#	TYPE	MATRIX	PRESERVATION	TPH-g	TPH-2	TURBIDITY	ALCOHOL	HEXAMINE	ETHANOL	TBA	TAT
311139	MW-10R	2/12/14	933	9	TVWA PL, Ambient	Water	HCL	X	X	X	X	X	X	X	
311138	MW-26		1350					X	X	X	X	X	X	X	
311139	MW-27		1350					X	X	X	X	X	X	X	
311140	MW-28		1130					X	X	X	X	X	X	X	
311141	MW-29		1210					X	X	X	X	X	X	X	
Collected By: Paola GB	Date: 2/12/14	Time: 15:00	Relinquished By: Bob Gutzler			Date: 2/12/14	Time: 15:00	Received For Laboratory: Alex				Date: 2-12-14	Time: 15:00	TAT: <input checked="" type="checkbox"/> Rush 3-day	



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**ANALYTICAL RESULTS**

**Ordered By**

SCS Engineers  
 3900 Kilroy Airport Way #100  
 Long Beach, CA 90806-

Telephone: (562)426-9574

Attn: Bob Gutzler

Page: 2

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8015B, TPH DROs and OROs (Diesel and Oil Range Organics)

QC Batch No: W1P-021314

Our Lab I.D.		311137	311138	311139	311140	311141
Client Sample I.D.		MW-10R	MW-26	MW-27	MW-28	MW-29
Date Sampled		02/12/2014	02/12/2014	02/12/2014	02/12/2014	02/12/2014
Date Prepared		02/13/2014	02/13/2014	02/13/2014	02/13/2014	02/13/2014
Preparation Method						
Date Analyzed		02/13/2014	02/13/2014	02/13/2014	02/13/2014	02/13/2014
Matrix		Water	Water	Water	Water	Water
Units		mg/L	mg/L	mg/L	mg/L	mg/L
Dilution Factor		1	1	1	1	1
Analytes	FQL	Results	Results	Results	Results	Results
TPH DROs (C10 to C28)	0.500	46.3	ND	ND	ND	ND
TPH OROs (C28+)	0.500	ND	ND	ND	ND	ND

*Comment(s):*

311137: High surrogate recovery due to matrix.

Our Lab I.D.		311137	311138	311139	311140	311141
Surrogates	% Rec.Limit	% Rec.				
Surrogate Percent Recovery						
Chlorobenzene	70-120	164	98	103	101	108

**QUALITY CONTROL REPORT**

QC Batch No: W1P-021314

Analytes	MS % REC	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit				
Diesel	110	113	2.7	75-120	<20				



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**ANALYTICAL RESULTS**

**Ordered By**

SCS Engineers  
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 Long Beach, CA 90806-

Telephone: (562)426-9574

Attn: Bob Gutzler

Page: 3

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8015B, TPH GROs (Gasoline Range Organics)

QC Batch No: W1G-021414

Our Lab I.D.		311139	311141			
Client Sample I.D.		MW-27	MW-29			
Date Sampled		02/12/2014	02/12/2014			
Date Prepared		02/14/2014	02/14/2014			
Preparation Method						
Date Analyzed		02/14/2014	02/14/2014			
Matrix		Water	Water			
Units		ug/L	ug/L			
Dilution Factor		1	1			
Analytes	PQL	Results	Results			
TPH GROs (C6 to C10)	50.0	350	2780			

Our Lab I.D.		311139	311141			
Surrogates	% Rec.Limit	% Rec.	% Rec.			
Surrogate Percent Recovery						
Bromofluorobenzene	70-120	96	70			

**QUALITY CONTROL REPORT**

QC Batch No: W1G-021414

Analytes	MS % REC	MS DUP % REC	RPD %						
Benzene	96	94	2.1						
Toluene	91	95	4.3						



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**ANALYTICAL RESULTS**

**Ordered By**

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 3900 Kilroy Airport Way #100  
 Long Beach, CA 90806

Telephone: (562)426-9574

Attn: Bob Gutzler

Page: 4

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LE

Method: 8015B, TPH GROs (Gasoline Range Organics)

QC Batch No: W1G-021414

Our Lab I.D.		311137				
Client Sample I.D.		MW-10R				
Date Sampled		02/12/2014				
Date Prepared		02/14/2014				
Preparation Method						
Date Analyzed		02/14/2014				
Matrix		Water				
Units		ug/L				
Dilution Factor		5				
Analytes	PQL	Results				
TPH GROs (C6 to C10)	250	10600				

Our Lab I.D.		311137				
Surrogates	% Rec. Limit	% Rec.				
Surrogate Percent Recovery						
Bromofluorobenzene	70-120	111				

**QUALITY CONTROL REPORT**

QC Batch No: W1G-021414

Analytes	MS % REC	MS DUP % REC	RPD %						
Benzene	96	94	2.1						
Toluene	91	95	4.3						



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**ANALYTICAL RESULTS**

**Ordered By**

SCS Engineers  
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 Long Beach, CA 90806-

Telephone: (562)426-9574

Attn: Bob Gutzler

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Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8015B, TPH GROs (Gasoline Range Organics)

QC Batch No: W1H-021314

Our Lab I.D.		311138	311140			
Client Sample I.D.		MW-26	MW-28			
Date Sampled		02/12/2014	02/12/2014			
Date Prepared		02/13/2014	02/13/2014			
Preparation Method						
Date Analyzed		02/13/2014	02/13/2014			
Matrix		Water	Water			
Units		ug/L	ug/L			
Dilution Factor		1	1			
Analytes	EQL	Results	Results			
TPH GROs (C6 to C10)	50.0	1730	ND			

Our Lab I.D.		311138	311140			
Surrogates	% Rec.Limit	% Rec.	% Rec.			
Surrogate Percent Recovery						
Bromofluorobenzene	70-120	71	111			

**QUALITY CONTROL REPORT**

QC Batch No: W1H-021314

Analytes	MS % REC	MS DUP % REC	RPD %						
Benzene	100	102	2.0						
Toluene	99	99	<1						



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**ANALYTICAL RESULTS**

**Ordered By**

SCS Engineers  
 3900 Kilroy Airport Way #100  
 Long Beach, CA 90806-

Telephone: (562)426-9574

Attn: Bob Gutzler

Page: 6

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021314

Our Lab I.D.		311138	311140		
Client Sample I.D.		MW-26	MW-28		
Date Sampled		02/12/2014	02/12/2014		
Date Prepared		02/14/2014	02/14/2014		
Preparation Method					
Date Analyzed		02/14/2014	02/14/2014		
Matrix		Water	Water		
Units		ug/L	ug/L		
Dilution Factor		1	1		
<b>Analytes</b>	<b>PQL</b>	<b>Results</b>	<b>Results</b>		
Acetone	5.00	ND	ND		
Benzene	1.00	ND	ND		
Bromobenzene (Phenyl bromide)	1.00	ND	ND		
Bromochloromethane (Chlorobromomethane)	1.00	ND	ND		
Bromodichloromethane (Dichlorobromomethane)	1.00	ND	ND		
Bromoform (Tribromomethane)	5.00	ND	ND		
Bromomethane (Methyl bromide)	3.00	ND	ND		
2-Butanone (MEK, Methyl ethyl ketone)	5.00	ND	ND		
n-Butylbenzene	1.00	3.58	ND		
sec-Butylbenzene	1.00	10.8	ND		
tert-Butylbenzene	1.00	ND	ND		
Carbon disulfide	1.00	ND	ND		
Carbon tetrachloride (Tetrachloromethane)	1.00	ND	ND		
Chlorobenzene	1.00	ND	ND		
Chloroethane	3.00	ND	ND		
2-Chloroethyl vinyl ether	5.00	ND	ND		
Chloroform (Trichloromethane)	1.00	ND	ND		
Chloromethane (Methyl chloride)	3.00	ND	ND		
4-Chlorotoluene (p-Chlorotoluene)	1.00	ND	ND		
DIPE	2.00	ND	ND		
2-Chlorotoluene (o-Chlorotoluene)	1.00	ND	ND		
1,2-Dibromo-3-chloropropane (DBCP)	5.00	ND	ND		
Dibromochloromethane	1.00	ND	ND		
1,2-Dibromoethane (EDB, Ethylene dibromide)	1.00	ND	ND		
Dibromomethane	1.00	ND	ND		
1,2-Dichlorobenzene (o-Dichlorobenzene)	1.00	ND	ND		
1,3-Dichlorobenzene (m-Dichlorobenzene)	1.00	ND	ND		
1,4-Dichlorobenzene (p-Dichlorobenzene)	1.00	ND	ND		
Dichlorodifluoromethane	3.00	ND	ND		



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## ANALYTICAL RESULTS

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Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021314

Our Lab I.D.		311138	311140			
Client Sample I.D.		MW-26	MW-28			
Date Sampled		02/12/2014	02/12/2014			
Date Prepared		02/14/2014	02/14/2014			
Preparation Method						
Date Analyzed		02/14/2014	02/14/2014			
Matrix		Water	Water			
Units		ug/L	ug/L			
Dilution Factor		1	1			
Analytes	FQL	Results	Results			
1,1-Dichloroethane	1.00	ND	ND			
1,2-Dichloroethane	1.00	ND	ND			
1,1-Dichloroethene (1,1-Dichloroethylene)	1.00	ND	ND			
cis-1,2-Dichloroethene	1.00	ND	ND			
trans-1,2-Dichloroethene	1.00	ND	ND			
1,2-Dichloropropane	1.00	44.2	ND			
1,3-Dichloropropane	1.00	ND	ND			
2,2-Dichloropropane	1.00	ND	ND			
1,1-Dichloropropene	1.00	ND	ND			
cis-1,3-Dichloropropene	1.00	ND	ND			
ETBE	2.00	ND	ND			
trans-1,3-Dichloropropene	1.00	ND	ND			
Ethylbenzene	1.00	1.48	ND			
Hexachlorobutadiene (1,3-Hexachlorobutadiene)	3.00	ND	ND			
2-Hexanone	5.00	ND	ND			
Isopropylbenzene	1.00	28.9	ND			
p-Isopropyltoluene (4-Isopropyltoluene)	1.00	1.07	ND			
MTBE	2.00	ND	ND			
4-Methyl-2-pentanone (MIBK, Methyl isobutyl ketone)	5.00	ND	ND			
Methylene chloride (Dichloromethane, DCM)	5.00	ND	ND			
Naphthalene	1.00	1.32	ND			
TAME	2.00	ND	ND			
n-Propylbenzene	1.00	33.2	ND			
TBA	10.0	ND	ND			
Styrene	1.00	ND	ND			
1,1,1,2-Tetrachloroethane	1.00	ND	ND			
1,1,2,2-Tetrachloroethane	1.00	ND	ND			
tert-amyl Alcohol	100	ND	ND			
Tetrachloroethene (Tetrachloroethylene)	1.00	ND	ND			
Toluene (Methyl benzene)	1.00	1.07	ND			
1,2,3-Trichlorobenzene	1.00	ND	ND			
1,2,4-Trichlorobenzene	1.00	ND	ND			
1,1,1-Trichloroethane	1.00	ND	ND			
1,1,2-Trichloroethane	1.00	ND	ND			
Trichloroethene (TCE)	1.00	ND	ND			



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**ANALYTICAL RESULTS**

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Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021314

Our Lab I.D.		311138	311140			
Client Sample I.D.		MW-26	MW-28			
Date Sampled		02/12/2014	02/12/2014			
Date Prepared		02/14/2014	02/14/2014			
Preparation Method						
Date Analyzed		02/14/2014	02/14/2014			
Matrix		Water	Water			
Units		ug/L	ug/L			
Dilution Factor		1	1			
Analytes	PQL	Results	Results			
Trichlorofluoromethane	1.00	ND	ND			
1,2,3-Trichloropropane	1.00	5.03	ND			
1,2,4-Trimethylbenzene	1.00	2.86	ND			
1,3,5-Trimethylbenzene	1.00	ND	ND			
Vinyl acetate	5.00	ND	ND			
Vinyl chloride (Chloroethene)	3.00	ND	ND			
o-Xylene	1.00	3.00	1.05			
m- & p-Xylenes	2.00	3.37	ND			

Our Lab I.D.		311138	311140			
Surrogates	% Rec.Limit	% Rec.	% Rec.			
Surrogate Percent Recovery						
Bromofluorobenzene	70-120	80	101			
Dibromofluoromethane	70-120	103	97			
Toluene-d8	70-120	96	102			

**QUALITY CONTROL REPORT**

QC Batch No: W2B-021314

Analytes	MS % REC	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit					
Benzene	101	98	3.0	75-120	15					
Chlorobenzene	105	103	1.9	75-120	15					
1,1-Dichloroethene (1,1-Dichloroethylene)	105	102	2.9	75-120	15					
MTBE	97	95	2.1	75-120	15					
Toluene (Methyl benzene)	84	83	1.2	75-120	15					
Trichloroethene (TCE)	98	96	2.1	75-120	15					



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**ANALYTICAL RESULTS**

**Ordered By**

SCS Engineers  
 3900 Kilroy Airport Way #100  
 Long Beach, CA 90806

Telephone: (562)426-9574

Attn: Bob Gutzler

Page: 9

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021414

Our Lab I.D.		311137	311141		
Client Sample I.D.		MW-10R	MW-29		
Date Sampled		02/12/2014	02/12/2014		
Date Prepared		02/15/2014	02/15/2014		
Preparation Method					
Date Analyzed		02/15/2014	02/15/2014		
Matrix		Water	Water		
Units		ug/L	ug/L		
Dilution Factor		5	5		
Analytes	PQL	Results	Results		
Acetone	25.0	ND	ND		
Benzene	5.00	239	555		
Bromobenzene (Phenyl bromide)	5.00	ND	ND		
Bromochloromethane (Chlorobromomethane)	5.00	ND	ND		
Bromodichloromethane (Dichlorobromomethane)	5.00	ND	ND		
Bromoform (Tribromomethane)	25.0	ND	ND		
Bromomethane (Methyl bromide)	15.0	ND	ND		
2-Butanone (MEK, Methyl ethyl ketone)	25.0	ND	ND		
n-Butylbenzene	5.00	ND	ND		
sec-Butylbenzene	5.00	ND	ND		
tert-Butylbenzene	5.00	ND	ND		
Carbon disulfide	5.00	ND	ND		
Carbon tetrachloride (Tetrachloromethane)	5.00	ND	ND		
Chlorobenzene	5.00	ND	123		
Chloroethane	15.0	ND	ND		
2-Chloroethyl vinyl ether	25.0	ND	ND		
Chloroform (Trichloromethane)	5.00	ND	ND		
Chloromethane (Methyl chloride)	15.0	ND	ND		
4-Chlorotoluene (p-Chlorotoluene)	5.00	ND	ND		
DIPE	10.0	ND	ND		
2-Chlorotoluene (o-Chlorotoluene)	5.00	ND	ND		
1,2-Dibromo-3-chloropropane (DBCP)	25.0	ND	ND		
Dibromochloromethane	5.00	ND	ND		
1,2-Dibromoethane (EDB, Ethylene dibromide)	5.00	ND	ND		
Dibromomethane	5.00	ND	ND		
1,2-Dichlorobenzene (o-Dichlorobenzene)	5.00	ND	ND		
1,3-Dichlorobenzene (m-Dichlorobenzene)	5.00	ND	ND		
1,4-Dichlorobenzene (p-Dichlorobenzene)	5.00	ND	ND		
Dichlorodifluoromethane	15.0	ND	ND		



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ANALYTICAL RESULTS

Page: 10

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021414

Our Lab I.D.		311137	311141		
Client Sample I.D.		MW-10R	MW-29		
Date Sampled		02/12/2014	02/12/2014		
Date Prepared		02/15/2014	02/15/2014		
Preparation Method					
Date Analyzed		02/15/2014	02/15/2014		
Matrix		Water	Water		
Units		ug/L	ug/L		
Dilution Factor		5	5		
Analytes	FQL	Results	Results		
1,1-Dichloroethane	5.00	ND	39.0		
1,2-Dichloroethane	5.00	ND	ND		
1,1-Dichloroethene (1,1-Dichloroethylene)	5.00	ND	ND		
cis-1,2-Dichloroethene	5.00	ND	ND		
trans-1,2-Dichloroethene	5.00	ND	ND		
1,2-Dichloropropane	5.00	ND	10.3		
1,3-Dichloropropane	5.00	ND	21.9		
2,2-Dichloropropane	5.00	ND	ND		
1,1-Dichloropropene	5.00	ND	10.5		
cis-1,3-Dichloropropene	5.00	ND	ND		
ETBE	10.0	ND	ND		
trans-1,3-Dichloropropene	5.00	ND	ND		
Ethylbenzene	5.00	517	13.3		
Hexachlorobutadiene (1,3-Hexachlorobutadiene)	15.0	ND	ND		
2-Hexanone	25.0	ND	ND		
Isopropylbenzene	5.00	24.4	ND		
p-Isopropyltoluene (4-Isopropyltoluene)	5.00	ND	ND		
MTBE	10.0	ND	ND		
4-Methyl-2-pentanone (MIBK, Methyl isobutyl ketone)	25.0	ND	ND		
Methylene chloride (Dichloromethane, DCM)	25.0	ND	ND		
Naphthalene	5.00	7.10	ND		
TAME	10.0	ND	ND		
n-Propylbenzene	5.00	12.9	ND		
TBA	50.0	545	ND		
Styrene	5.00	ND	ND		
1,1,1,2-Tetrachloroethane	5.00	ND	ND		
1,1,2,2-Tetrachloroethane	5.00	ND	ND		
tert-amyl Alcohol	500	ND	ND		
Tetrachloroethene (Tetrachloroethylene)	5.00	ND	ND		
Toluene (Methyl benzene)	5.00	ND	27.4		
1,2,3-Trichlorobenzene	5.00	ND	ND		
1,2,4-Trichlorobenzene	5.00	ND	ND		
1,1,1-Trichloroethane	5.00	ND	ND		
1,1,2-Trichloroethane	5.00	ND	ND		
Trichloroethene (TCE)	5.00	ND	ND		



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**ANALYTICAL RESULTS**

Page: 11

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021414

Our Lab I.D.		311137	311141		
Client Sample I.D.		MW-10R	MW-29		
Date Sampled		02/12/2014	02/12/2014		
Date Prepared		02/15/2014	02/15/2014		
Preparation Method					
Date Analyzed		02/15/2014	02/15/2014		
Matrix		Water	Water		
Units		ug/L	ug/L		
Dilution Factor		5	5		
Analytes	FQL	Results	Results		
Trichlorofluoromethane	5.00	ND	ND		
1,2,3-Trichloropropane	5.00	ND	ND		
1,2,4-Trimethylbenzene	5.00	ND	ND		
1,3,5-Trimethylbenzene	5.00	ND	ND		
Vinyl acetate	25.0	ND	ND		
Vinyl chloride (Chloroethene)	15.0	ND	ND		
o-Xylene	5.00	ND	14.8		
m- & p-Xylenes	10.0	25.3	21.3		

Our Lab I.D.		311137	311141		
Surrogates	% Rec.Limit	% Rec.	% Rec.		
Surrogate Percent Recovery					
Bromofluorobenzene	70-120	85	96		
Dibromofluoromethane	70-120	114	95		
Toluene-d8	70-120	103	108		

**QUALITY CONTROL REPORT**

QC Batch No: W2B-021414

Analytes	MS % REC	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit				
Benzene	103	99	4.0	75-120	15				
Chlorobenzene	109	105	3.7	75-120	15				
1,1-Dichloroethene (1,1-Dichloroethylene)	107	104	2.8	75-120	15				
MTBE	106	98	7.8	75-120	15				
Toluene (Methyl benzene)	84	84	<1	75-120	15				
Trichloroethene (TCE)	100	98	2.0	75-120	15				



**AMERICAN SCIENTIFIC LABORATORIES, LLC**  
*Environmental Testing Services*

2520 N. Sun Fernando Rd., Los Angeles, CA 90065 Tel: (323) 223-9700 Fax: (323) 223-9500

**ANALYTICAL RESULTS**

**Ordered By**

SCS Engineers  
 3900 Killroy Airport Way #100  
 Long Beach, CA 90806-

Telephone: (562)426-9574

Attn: Bob Gutzler

Page: 12

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LE

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021414

Our Lab I.D.		311139			
Client Sample I.D.		MW-27			
Date Sampled		02/12/2014			
Date Prepared		02/15/2014			
Preparation Method					
Date Analyzed		02/15/2014			
Matrix		Water			
Units		ug/L			
Dilution Factor		20			
Analytes	FQL	Results			
Acetone	100	ND			
Benzene	20.0	57.2			
Bromobenzene (Phenyl bromide)	20.0	ND			
Bromochloromethane (Chlorobromomethane)	20.0	ND			
Bromodichloromethane (Dichlorobromomethane)	20.0	ND			
Bromoform (Tribromomethane)	100	ND			
Bromomethane (Methyl bromide)	60.0	ND			
2-Butanone (MEK, Methyl ethyl ketone)	100	ND			
n-Butylbenzene	20.0	ND			
sec-Butylbenzene	20.0	ND			
tert-Butylbenzene	20.0	ND			
Carbon disulfide	20.0	ND			
Carbon tetrachloride (Tetrachloromethane)	20.0	ND			
Chlorobenzene	20.0	ND			
Chloroethane	60.0	ND			
2-Chloroethyl vinyl ether	100	ND			
Chloroform (Trichloromethane)	20.0	ND			
Chloromethane (Methyl chloride)	60.0	ND			
4-Chlorotoluene (p-Chlorotoluene)	20.0	ND			
DIPE	40.0	ND			
2-Chlorotoluene (o-Chlorotoluene)	20.0	ND			
1,2-Dibromo-3-chloropropane (DBCP)	100	ND			
Dibromochloromethane	20.0	ND			
1,2-Dibromoethane (EDB, Ethylene dibromide)	20.0	ND			
Dibromomethane	20.0	ND			
1,2-Dichlorobenzene (o-Dichlorobenzene)	20.0	ND			
1,3-Dichlorobenzene (m-Dichlorobenzene)	20.0	ND			
1,4-Dichlorobenzene (p-Dichlorobenzene)	20.0	ND			
Dichlorodifluoromethane	60.0	ND			



AMERICAN SCIENTIFIC LABORATORIES, LLC  
 Environmental Testing Services

2520 N. San Fernando Rd., Los Angeles, CA 90065 Tel: (323) 223-9700 Fax: (323) 223-9500

ANALYTICAL RESULTS

Page: 13

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-IB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021414

Our Lab I.D.		311139			
Client Sample I.D.		MW-27			
Date Sampled		02/12/2014			
Date Prepared		02/15/2014			
Preparation Method					
Date Analyzed		02/15/2014			
Matrix		Water			
Units		ug/L			
Dilution Factor		20			
Analytes	PQL	Results			
1,1-Dichloroethane	20.0	ND			
1,2-Dichloroethane	20.0	ND			
1,1-Dichloroethene (1,1-Dichloroethylene)	20.0	ND			
cis-1,2-Dichloroethene	20.0	ND			
trans-1,2-Dichloroethene	20.0	ND			
1,2-Dichloropropane	20.0	3870			
1,3-Dichloropropane	20.0	ND			
2,2-Dichloropropane	20.0	ND			
1,1-Dichloropropene	20.0	ND			
cis-1,3-Dichloropropene	20.0	ND			
ETBE	40.0	ND			
trans-1,3-Dichloropropene	20.0	ND			
Ethylbenzene	20.0	ND			
Hexachlorobutadiene (1,3-Hexachlorobutadiene)	60.0	ND			
2-Hexanone	100	ND			
Isopropylbenzene	20.0	ND			
p-Isopropyltoluene (4-Isopropyltoluene)	20.0	ND			
MTBE	40.0	ND			
4-Methyl-2-pentanone (MIBK, Methyl isobutyl ketone)	100	ND			
Methylene chloride (Dichloromethane, DCM)	100	ND			
Naphthalene	20.0	ND			
TAME	40.0	ND			
n-Propylbenzene	20.0	ND			
TBA	200	ND			
Styrene	20.0	ND			
1,1,1,2-Tetrachloroethane	20.0	ND			
1,1,2,2-Tetrachloroethane	20.0	ND			
tert-amyl Alcohol	2000	ND			
Tetrachloroethene (Tetrachloroethylene)	20.0	ND			
Toluene (Methyl benzene)	20.0	ND			
1,2,3-Trichlorobenzene	20.0	ND			
1,2,4-Trichlorobenzene	20.0	ND			
1,1,1-Trichloroethane	20.0	ND			
1,1,2-Trichloroethane	20.0	ND			
Trichloroethene (TCE)	20.0	ND			



**AMERICAN SCIENTIFIC LABORATORIES, LLC**  
*Environmental Testing Services*

2520 N. San Fernando Rd., Los Angeles, CA 90065 Tel: (323) 223-9700 Fax: (323) 223-9500

**ANALYTICAL RESULTS**

Page: 14

Project Name: Port DC

ASL Job Number	Submitted	Client
59849	02/12/2014	SCS-LB

Method: 8260B, Volatile Organic Compounds and 6 oxygenates

QC Batch No: W2B-021414

Our Lab I.D.		311139			
Client Sample I.D.		MW-27			
Date Sampled		02/12/2014			
Date Prepared		02/15/2014			
Preparation Method					
Date Analyzed		02/15/2014			
Matrix		Water			
Units		ug/L			
Dilution Factor		20			
Analytes	PQL	Results			
Trichloro fluoromethane	20.0	ND			
1,2,3-Trichloropropane	20.0	241			
1,2,4-Trimethylbenzene	20.0	ND			
1,3,5-Trimethylbenzene	20.0	ND			
Vinyl acetate	100	ND			
Vinyl chloride (Chloroethene)	60.0	ND			
o-Xylene	20.0	ND			
m- & p-Xylenes	40.0	ND			

Our Lab I.D.		311139			
Surrogates	% Rec.Limit	% Rec.			
Surrogate Percent Recovery					
Bromofluorobenzene	70-120	97			
Dibromofluoromethane	70-120	94			
Toluene-d8	70-120	102			

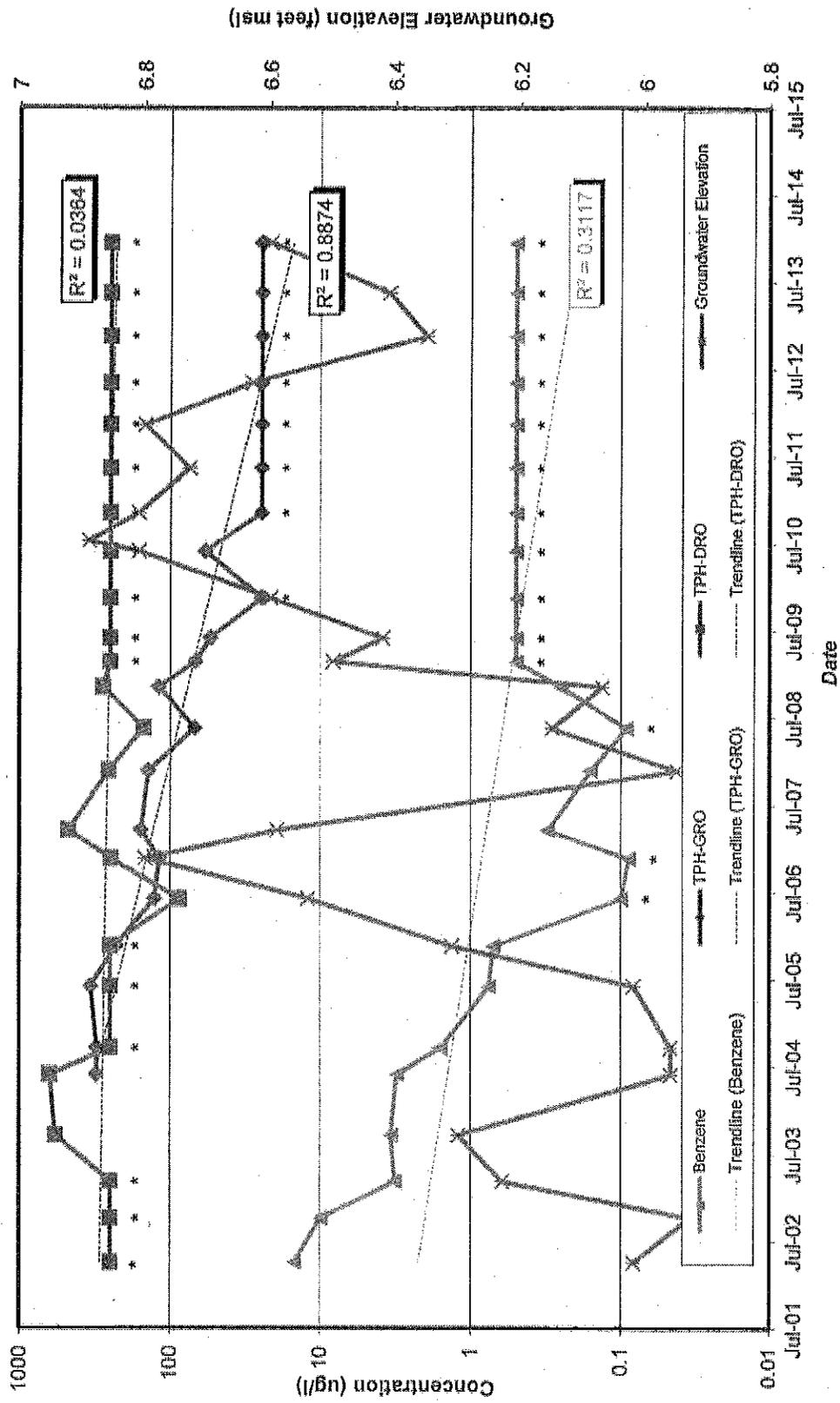
**QUALITY CONTROL REPORT**

QC Batch No: W2B-021414

Analytes	MS % REC	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit					
Benzene	103	99	4.0	75-120	15					
Chlorobenzene	109	105	3.7	75-120	15					
1,1-Dichloroethene (1,1-Dichloroethylene)	107	104	2.8	75-120	15					
MTBE	106	98	7.8	75-120	15					
Toluene (Methyl benzene)	84	84	<1	75-120	15					
Trichloroethene (TCE)	100	98	2.0	75-120	15					

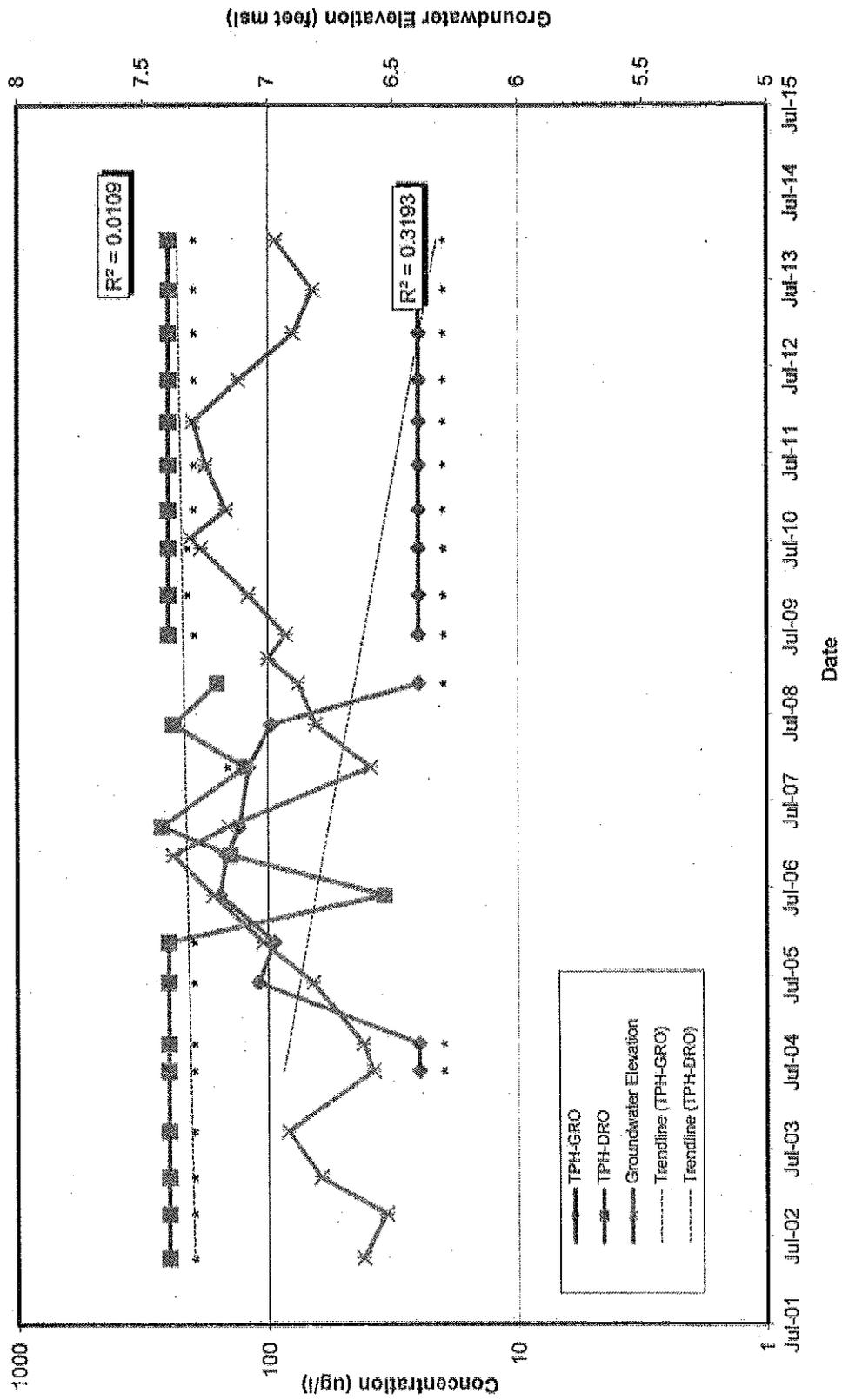
Appendix D  
Groundwater Concentration Graphs  
January 2014

Figure F-1. MW-5R Concentrations Over Time, San Pedro Business Center



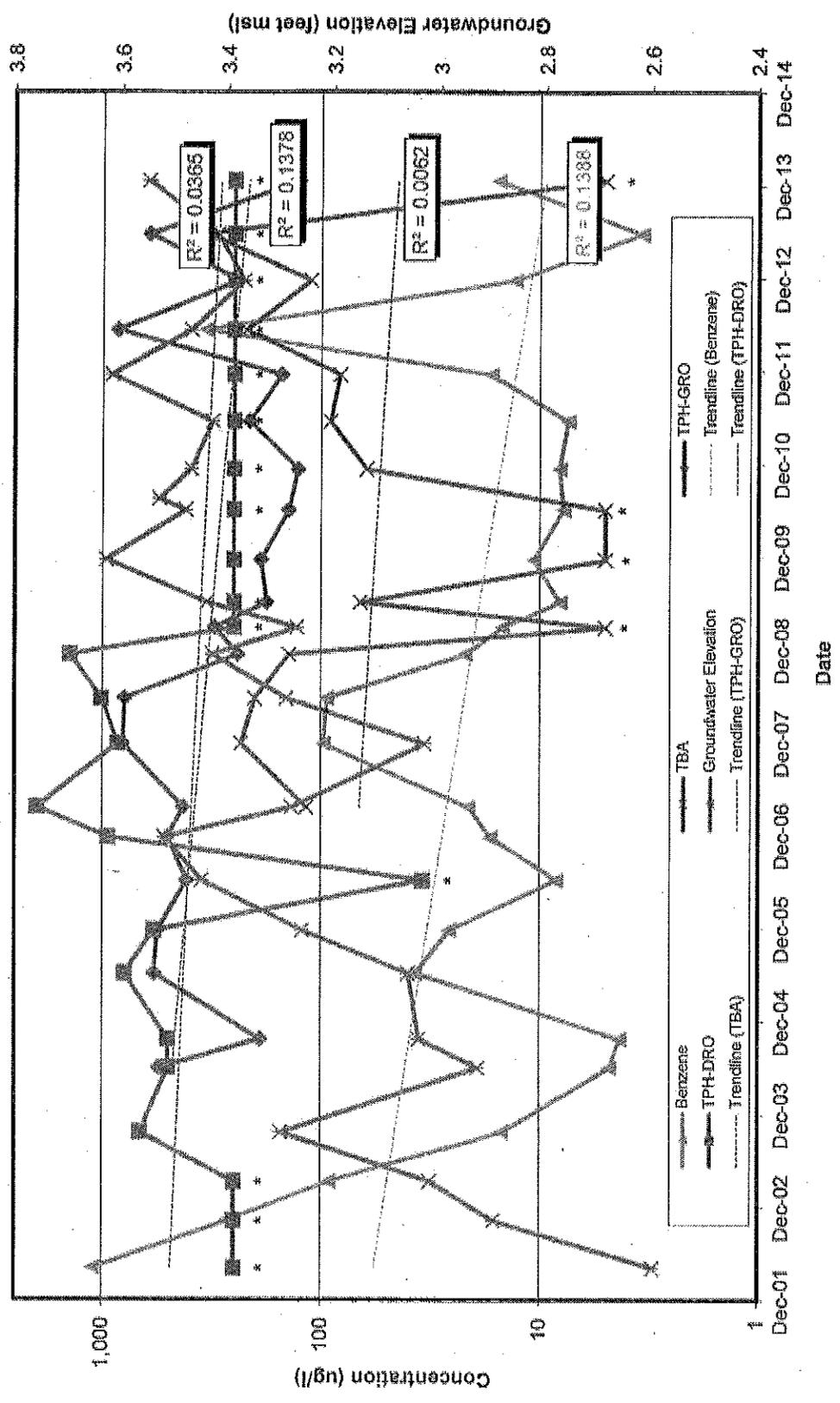
\* indicates data point is 1/2 detection limit, contaminant was not detected

Figure F-2. MW-8 Concentrations Over Time, San Pedro Business Center



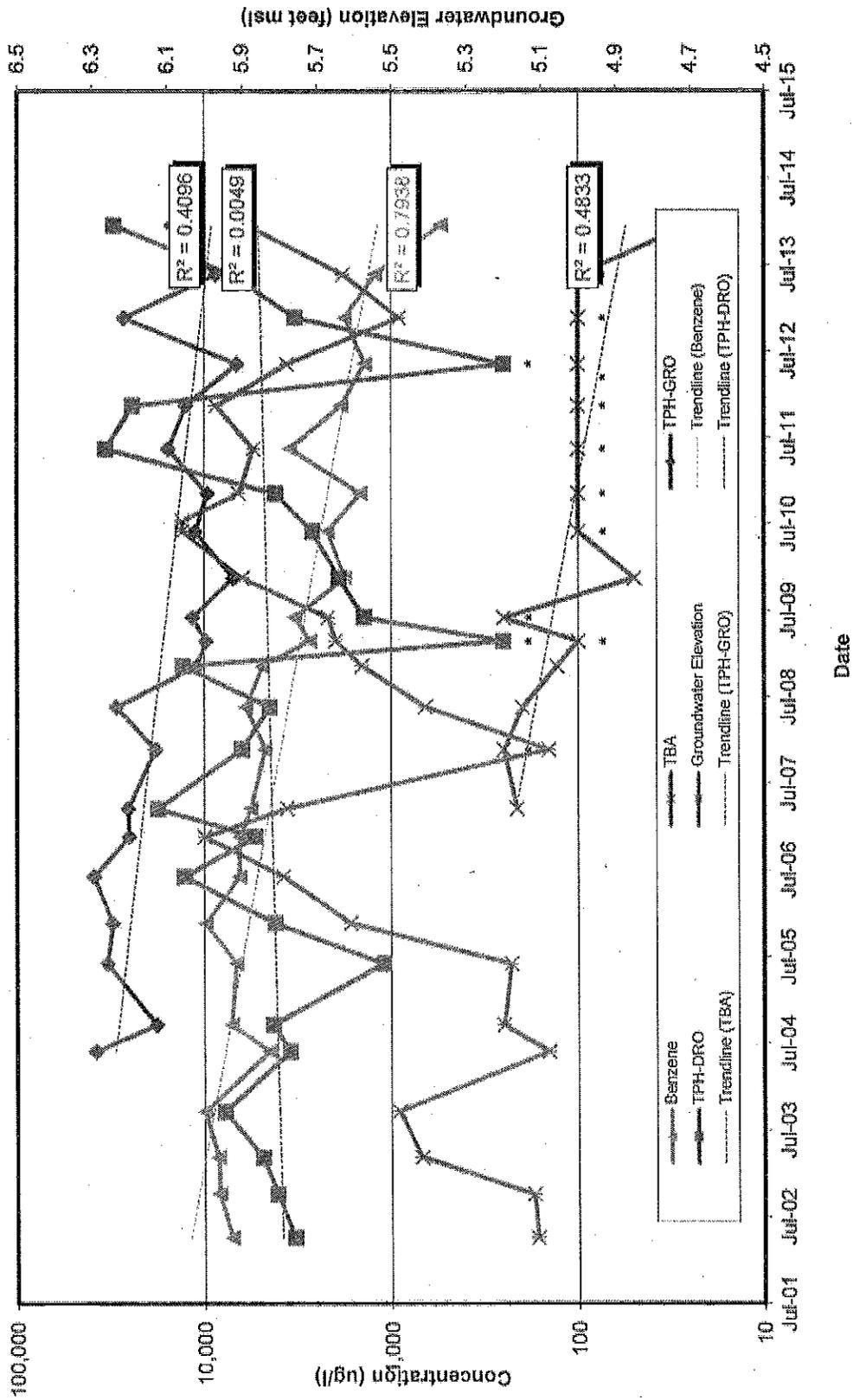
\* indicates data point is 1/2 detection limit, contaminant was not detected

Figure F-3. MW-9R Concentrations Over Time, San Pedro Business Center



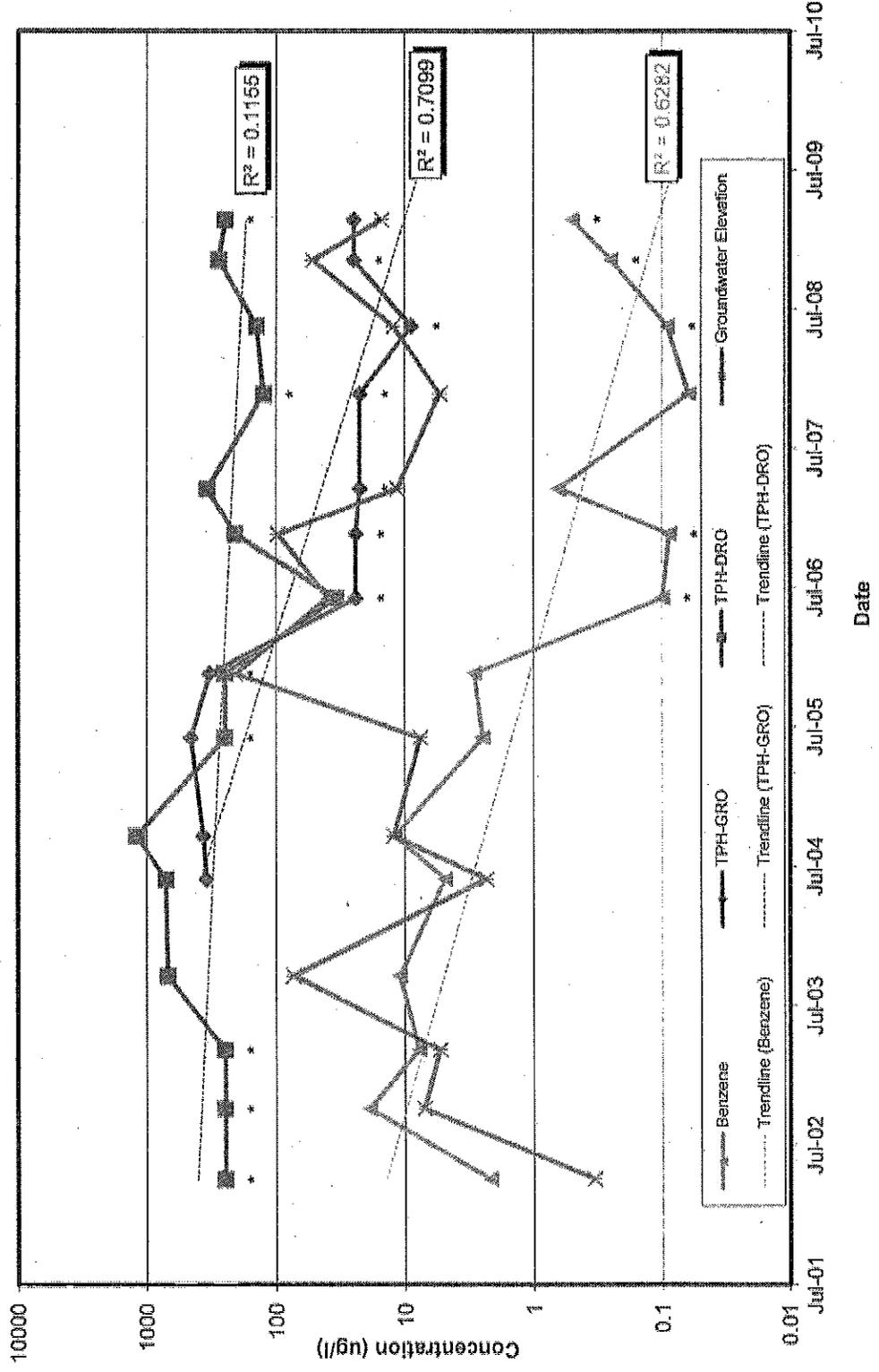
\* indicates data point is 1/2 detection limit, containment was not detected

Figure F-4. MW-10R Concentrations Over Time, San Pedro Business Center



\* indicates data point is 1/2 detection limit, contaminant was not detected

Figure F-5. MW-12 Concentrations Over Time, San Pedro Business Center  
Abandoned June 2009



\* indicates data point is 1/2 detection limit, contaminant was not detected

# **EXHIBIT 3**



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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Los Angeles Regional Water Quality Control Board

Western Fuel Oil San Pedro Site Meeting  
May 15, 2014

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AGENDA

- Introduction
- Status of Investigation
  - Presence of Sources for Groundwater Impact
  - Unstable Groundwater Plume
  - Incomplete Groundwater Delineation
- Status of Cleanup
  - Soil
  - Sources for Groundwater Impact and Dissolved Plume
- Discussion
  - Paths to Closure

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CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

380 West 4th St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)

## Site History

The Site is comprised of approximately 88 acres and was operated as an oil refinery from approximately 1923 to 1948. Its capacity was in the range of 8,000 to 10,000 barrels per day. The property was then operated as a storage terminal and transfer facility from approximately 1950 to 1995 for residual and heavy fuel oils, automotive fuels and basic chemical stocks. The Site also includes a former 20-acre scrap metal facility that operated from 1986 to 1995.

## Status of Investigation

### Presence of Sources for Groundwater Impact

Based on the laser-induced fluorescence rapid optical scanning tool (LIF-ROST) investigation performed in 2011 within the limited areas of the Site, discharged waste are still present in the subsurface as sources for groundwater contamination. Currently, free product is present in groundwater monitoring wells that are located about 750 feet apart (MW-19R, MW-6R and MW-14R). Presence of free product means that the discharged waste, light non-aqueous phase liquid (LNAPL), is mobile. For these wells, groundwater samples were collected beneath the free product to characterize LNAPL. In addition to the typical petroleum hydrocarbon compounds, fuel oxygenates are present as below indicating remaining LNAPL beneath the Site is a source for groundwater contamination with fuel oxygenates:

Groundwater Monitoring Well	Date Sampled	MTBE ( $\mu\text{g/L}$ )	TBA ( $\mu\text{g/L}$ )	TAA ( $\mu\text{g/L}$ )
MW-6R Shallow	8/9/2007	289	11,900	31,500
MW-6R Deep	8/9/2007	283	13,200	37,900
MW-14R Shallow	8/9/2007	ND <250	18,400	11,200
MW-14R Deep	8/9/2007	ND <250	15,000	9,220
MW-19R Shallow	8/9/2007	ND <500	ND <1,000	1,260

$\mu\text{g/L}$  = Microgram per Liter  
MTBE = Methyl tertiary-butyl ether  
TBA = Tertiary-butyl alcohol  
TAA = Tertiary-amyl alcohol  
ND = Non detect

Fuel oxygenates are highly soluble and migrate rapidly following preferential groundwater flow paths. Since the 2011 LIF-ROST investigation covered only the limited areas of the Site and confirmed the presence of LNAPL, further investigation for a site-wide assessment and remedy of the impacted groundwater are warranted.

### Unstable Groundwater Plume

Concentrations of total petroleum hydrocarbons (TPH) ranging from C10-C28 in the groundwater monitoring well MW-24, located in the internal part of the current groundwater monitoring network, have an increasing trend since 2012 as follows:

Date Sampled MW-24	TPH C10-C28 Concentration ( $\mu\text{g/L}$ )
June 2011	<500
December 2011	<500
May 2012	45,100
December 2012	74,800
June 2013	79,900

A groundwater sample beneath free product was collected in November 2013 from the groundwater monitoring well MW-6R, located about 15 feet away from MW-24, and tested for TPH C10-C28. The data showed that TPH C10-C28 concentration was 2,050,000  $\mu\text{g/L}$ , indicating LNAPL remaining beneath the Site is a source for TPH C10-C28. Since June 2013, a deep groundwater monitoring well MW-20D (screen interval from -83 to -98 feet mean sea level; top of well casing 102 feet above mean sea level), located 120 feet upgradient of MW-6R, was detected with TPH C10-C28 ranging from 642 to 2,710  $\mu\text{g/L}$ , suggesting that the dissolved plume is expanding and continuing impact to groundwater from free product.

Work conducted for MW-24 is as follows:

9/11/2013	Workplan for MW-24 source evaluation was approved
10/30/2013	To monitor MW-24 quarterly
11/14/2013	Well head modification plan for MW-24 was approved

### Incomplete Groundwater Delineation

In January 2014, offsite groundwater monitoring wells MW-26 to MW-29 were monitored for the first time after installation. The results showed elevated concentration of TPH C6-C10 and benzene. Based on recent data and the shallow groundwater flow direction, contaminated plume remains mobile and continues to move offsite. Additional offsite groundwater monitoring wells are warranted in the area directly east of groundwater monitoring wells with free product (MW-6R, MW-14R and MW-19R) to further assess and monitor the extent of the groundwater quality down gradient offsite.

The groundwater monitoring well, MW-19R, is located near the southeastern boundary of the site representing the most upgradient groundwater quality. As noted, free product is present in MW-19R. Additional onsite groundwater monitoring wells are warranted to delineate and monitor both free product and dissolved plumes in areas upgradient and cross-gradient of MW-19R.

California Water Code Section 13267 Order that was issued on February 4, 2010 states... "You have not yet completed site contamination characterization and have not organized site investigation data into a conceptual site model to assess the full extent of the groundwater contamination. The Regional Board needs the required reports in order to complete the vertical and lateral delineation of the groundwater contamination plume and properly implement remedial measures." In compliance with the Order BlackRock installed four offsite downgradient groundwater monitoring wells in December 2013.

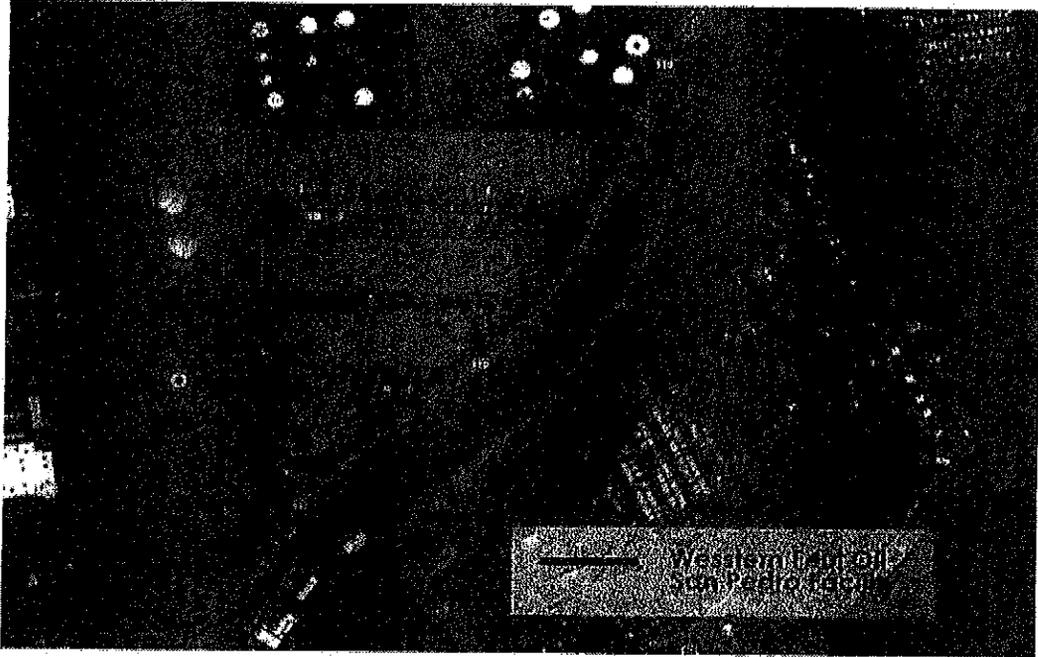
8/21/2012	Workplan for installation of offsite downgradient monitoring wells submitted
12/11/2012	Installation workplan approved
7/11/2013	2 <sup>nd</sup> time extension approved
12/11/2013	Installation report submitted
3/26/2014	Quarterly groundwater monitoring to be performed

Groundwater delineation for dissolved plumes should be completed in order to review adequately the submitted corrective action plan and feasibility study in September 2011.

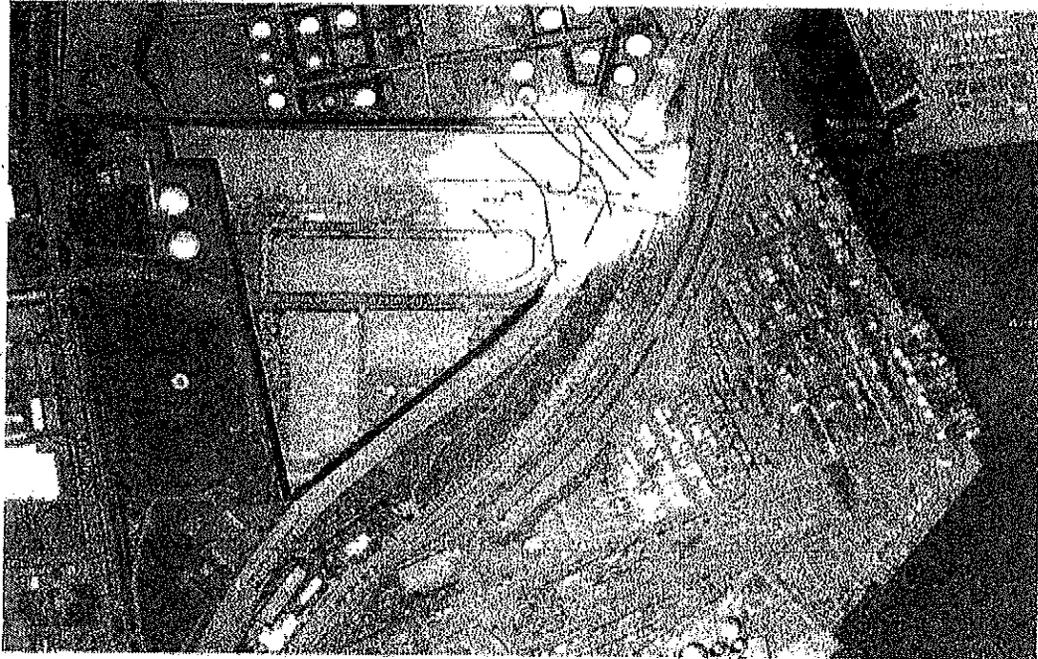
#### **Paths to Closure**

1. A complete delineation of impacted groundwater on and offsite.
2. Set cleanup goals and remediate the impacted groundwater plume.
3. Collect confirmation samples to document that the cleanup is complete.

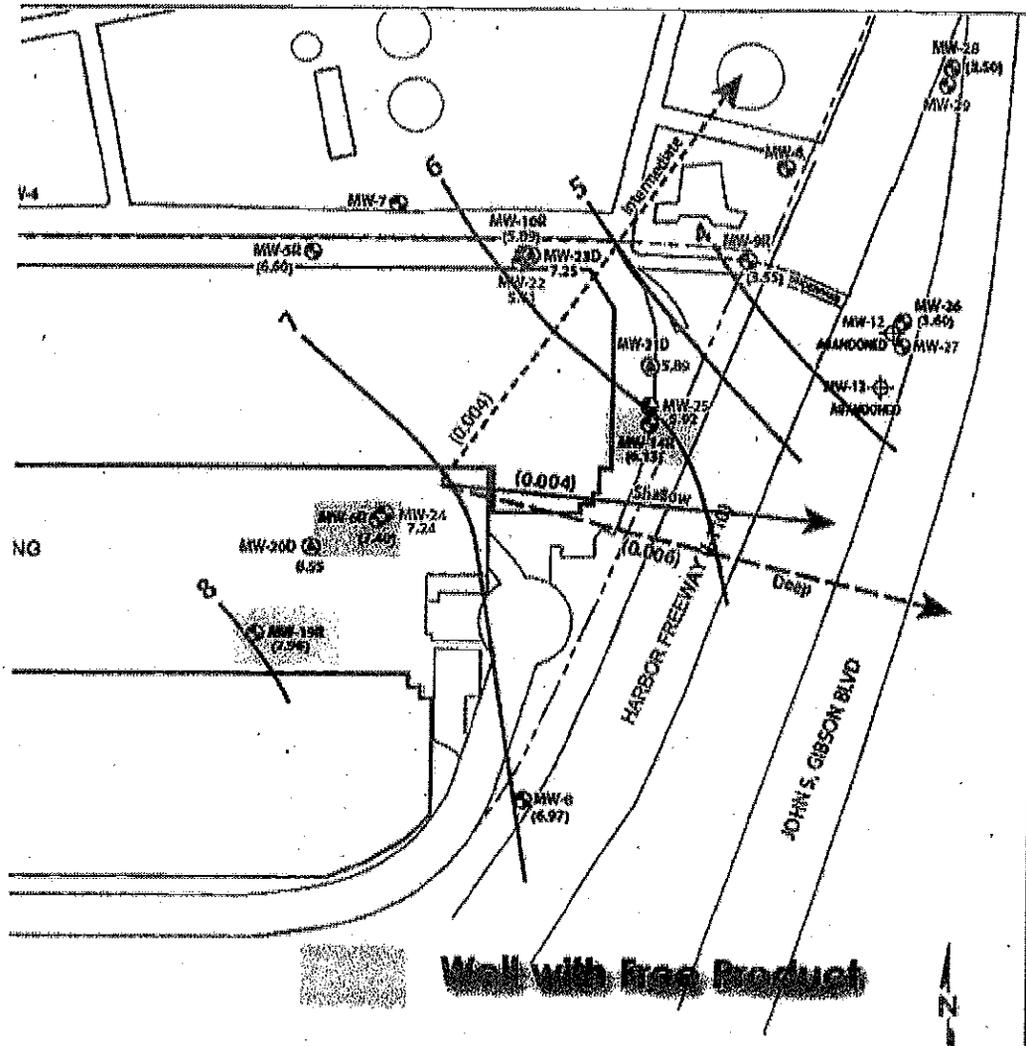
Site Map



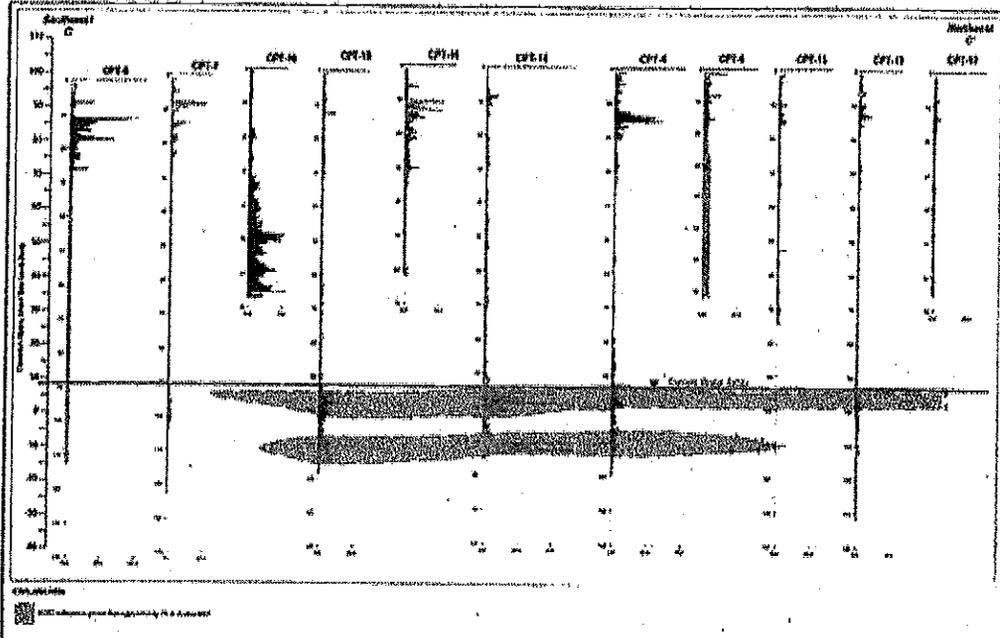
Groundwater Monitoring Wells



# Groundwater Monitoring Wells with Free Product



# Sources for Groundwater Impact



# **EXHIBIT 4**

# SCS ENGINEERS



## Response to Comments on Site Closure Status

**Port LA Distribution Center  
(CAO 85-17, SLIC No. 352,  
Site ID 2040069)  
300 Westmont Drive  
San Pedro, California 90733**

**Presented to:**

Mr. Sam Unger  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, California 90013

**Prepared for:**

Mr. Leland Nakaoka  
BlackRock Realty Advisors  
4400 MacArthur Boulevard, Suite 700  
Newport Beach, California 92660

**Presented by:**

SCS Engineers  
8799 Balboa Avenue, Suite 290  
San Diego, California 92123  
(858) 571-5500

June 11, 2014  
Project Number: 01205525.08

Offices Nationwide  
[www.scsengineers.com](http://www.scsengineers.com)

June 11, 2014

Mr. Sam Unger  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, California 90013

**Subject: Response to Comments on Site Closure Status  
(CAO 85-17, SLIC No. 352, Site ID 2040069)**

**Site: Port LA Distribution Center  
300 Westmont Drive  
San Pedro, California 90733  
Cleanup Abatement Order No. 85-17  
Site Cleanup Program No. 352**

Dear Mr. Unger:

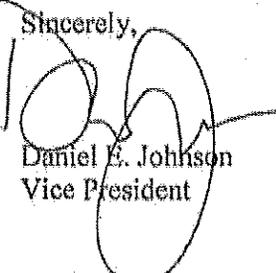
SCS Engineers (SCS) is pleased to present this Response to Comments on Site Closure Status on behalf of our client BlackRock Realty Advisors (BlackRock).

This response concerns the comments received from the Los Angeles Regional Water Quality Control Board (RWQCB) regarding discussion of closure of the Port LA Distribution Center, as presented by the RWQCB in the meeting agenda and during our meeting on May 15, 2014.

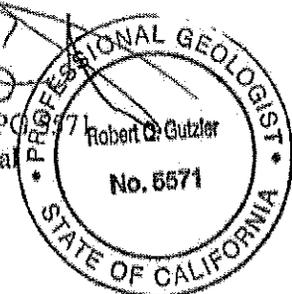
BlackRock has submitted documents that demonstrate that releases of petroleum hydrocarbons at the Site have been sufficiently mitigated to be protective of human health and the beneficial uses of water resources. The Site data not only meet and are consistent with prior investigations and remediation directives provided, but the Site also meets the criteria of the State Water Resource Control Board's Low-Threat Underground Storage Tank Case Closure Policy and Resolution No. 92-49. On the basis of meeting these criteria, SCS has requested and reiterates, on behalf of our client BlackRock, that the RWQCB issue a "no further action" letter and close the Cleanup Abatement Order No. 85-17 and associated release case, Site Cleanup Program No. 352.

If you have any questions, please contact us at (858) 571-5500.

Sincerely,

  
Daniel E. Johnson  
Vice President

  
Robert Q. Gutzler, PhD, PC  
Senior Project Professional



cc: Mr. Leland Nakaoka (w/encls.)

## 1.0 BACKGROUND

On May 15, 2014, a meeting was held at the Los Angeles Regional Water Quality Control Board (RWQCB) offices to discuss the *Technical Report in Support of Request for Closure* (Technical Report), of the *Port LA Distribution Center*, located at 300 Westmont Drive, San Pedro, California 90733 (Site) (CAO 85-17, SLIC No. 352, Site ID 2040069), submitted by SCS Engineers (SCS) to the RWQCB on March 18, 2014. The meeting was attended by representatives of the RWQCB, the State Water Resources Control Board (SWRCB), BlackRock Realty Advisors (BlackRock), Nossaman LLC, Aqui-Ver, Inc. (AVI), and SCS. The agenda and supporting documents provided by the RWQCB for this meeting are attached (Exhibit A).

This response pertains to the RWQCB's analysis of the Site status (as outlined in the "Status of Investigation" portion of their agenda). This response both provides a summary of the discussion and commentary from participants at the May 15, 2014, meeting and a rebuttal to the RWQCB's position.

The Technical Report notes that the Site conditions are consistent with closure under the SWRCB's Low-Threat Underground Storage Tank Case Closure Policy (Policy) and recommends closure of the release case associated with the Site. Such conditions reflect the 25-plus years of extensive investigation, characterization, remediation, and monitoring, including an estimated \$40 million remediation program, approved and overseen by the RWQCB. These efforts resulted in an aged and stable light non-aqueous phase liquid (LNAPL) and dissolved-phase plume, which is located in an area with poor groundwater quality (high salinity and total dissolved solids) that is unlikely to be developed in the future. In short, the Site does not pose a threat to or impair the beneficial use to the waters of the State and does not pose a threat to other sensitive receptors.

Despite this body of work, and rather than responding to the technical arguments in support of closure presented in the Technical Report, the RWQCB responded that it does not have sufficient information to evaluate the Site, and stated that closure would require more investigation. SCS disagrees with the RWQCB's assessment.

### 1.1 BASIS FOR CLOSURE

Based on SCS' analysis, as described in detail in the Technical Report, SCS believes the petroleum release at the Site exhibits attributes consistent with petroleum UST releases and the Site should be considered for closure under the Policy. The Technical Report notes that the on-Site release is old and well-characterized, and that, as a result of the successful long-term cleanup efforts, the LNAPL and dissolved-phase plumes are stable. The evaluations of Site conditions presented in the Technical Report demonstrate that additional cleanup is unwarranted in that it would have no meaningful impact on the residual mass of LNAPL.

The Technical Report provides a detailed discussion of the Site's consistency with cleanup goals:

- “Soil remediation at the Site is complete and the RWQCB has granted closure for Site soils. In addition, a soil vapor investigation and vapor intrusion risk assessment were completed and accepted by OEHHA, which has not been questioned by the RWQCB. Soil vapor does not pose a significant human health risk.
- “Based on the fate and transport modeling conducted by both AVI and SCS, and our review of historical as well as current groundwater monitoring data, SCS concludes that the dissolved-phase plume is stable or contained, both laterally and vertically and is unlikely to migrate to or impact sensitive receptors.
- “Given the extremely poor intrinsic water quality at the Site, and that the Site and dissolved phase plume are immediately adjacent to and upgradient of a groundwater basin without beneficial uses, the presence of CoCs in groundwater is highly unlikely to impair the beneficial uses of groundwater and the downgradient migration of CoCs will not result in exceedance of water quality objectives in the de-designated sub-area. Multiple lines of evidence have indicated that it is highly unlikely that the CoCs in groundwater from the Site will migrate to or impact surface waters present in the Northwest Slip, some 800 feet from the Site.
- “As has been previously indicated, extensive prior remediation efforts have been directed at LNAPL removal, including air sparging and soil vapor extraction (AS/SVE) as well as vacuum track purging and recovery. Literally millions of pounds of petroleum hydrocarbons have been removed from the subsurface of the Site as a result of remediation efforts. However, some LNAPL has been measured in Site wells subsequent to remediation and case closure of the soil at the Site.
- “Based on the work conducted by AVI, it is apparent that, while LNAPL is present in wells in two areas at the Site,
  - LNAPL conductivity is very low, as is LNAPL velocity, which is estimated at less than 1 foot per year, and possibly less;
  - Multiple other lines of evidence point to plume and LNAPL stability, including the age of plume and the plume morphology; and
  - LNAPL recovery using conventional methods such as hydraulic recovery or even AS/SVE, which was at one time successful in removing mass, are unlikely to induce any significant recovery using conventional designs and well spacings.
- “Under SWRCB guidance, further LNAPL recovery and remediation is not necessary nor would it be “practicable.” Indeed, considering the cost, cost per pound removed, or “net benefit” as put forward by AVI, further remediation would be an imprudent use of scarce resources to protect what should, in reality, be classified as non-beneficial use groundwater.

- “AVI concluded: ‘Given that the site has all risk pathways contained and managed (low-risk), and given that additional cleanup would have no net benefit to the waters of the State, and a high impact to site operations that would need to cease to complete that effort, it is our opinion that no further action is warranted beyond monitoring plume stability and ongoing natural attenuation. There simply is no additional action that might be taken in the face of these beneficial site commercial operations that would have any benefit, and in a variety of scenarios would have negative net benefits.’”

## 1.2 SITE HISTORY

The RWQCB summary noted the Site’s history as an oil refinery (1923 to 1948) and storage terminal and transfer facility for fuels and chemical (1950 to 1995), and also noted that the 88-acre Western Fuel Oil (WFO) site included a 20-acre scrap metal facility that operated at its southern tip from 1986 to 1995 (the former Hiuka America property [Hiuka property]).

The Site is located in the northern portion of San Pedro within the City of Los Angeles and part of the San Pedro Business Center, a 1.8-million-square-foot warehousing and distribution complex that services hundreds of millions of dollars of goods that flow through the Port of Los Angeles. The remediation and subsequent redevelopment of the Site is one of the most notable early success stories of brownfields redevelopment in the City of Los Angeles.

The Site has been extensively studied and remediated over the nearly 30 years since the RWQCB issued Cleanup Abatement Order (CAO) 85-17, and only a minor fraction of the original hydrocarbon plume remains beneath the Site. An estimated \$40 million Site-wide remediation program was implemented from May 1998 to October 2000, via AS/SVE, soil treatment, and soil excavation for off-Site disposal. That program removed an estimated 12,000,000 pounds of petroleum hydrocarbons; additionally, an estimated 40,000,000 pounds (approximately 350,000 cubic feet) of contaminated soil were removed from the Site during construction of the Port of LA Distribution Center. This substantial cleanup effort stabilized contaminant impacts and vastly reduced the presence of free phase hydrocarbons.

The Site occupies most of the former WFO property where petroleum refinery, then terminal, storage, and transfer, operations, were conducted from 1923 to 1995. The Hiuka property is now occupied by two warehouse buildings at 301 and 401 Westmont Drive, also a part of the San Pedro Business Center. In the late 1990s, the Site was purchased by a firm specializing in brownfields redevelopment and, as discussed above, the Site was extensively remediated and then successfully redeveloped as a commercial distribution facility. Current facilities at the Site include two large warehouse buildings, a central truck parking area, and access roads around the perimeter of the Site. With the exception of very limited areas of irrigated landscaping around the perimeter of the new development, the entire area surrounding the buildings at the Site has been covered with concrete pavement, limiting surface water infiltration, and on-Site sources of groundwater recharge.

During the long history of remediation efforts at the Site, a number of consultants have performed subsurface investigations and remedial actions. Documented work began in 1985 in response to CAO 85-17 and has continued since, including the Site-wide remediation work

leading to a “no further action” letter for soil at the Site. As the investigation progressed, the RWQCB concurred with the actions taken to complete the Site characterization prior to cleanup.

The approximately 20-acre Hiuka property was used for storage and consolidation of scrap metals between 1986 and 1995. The RWQCB issued a soil closure letter for the Hiuka property on January 7, 2000. Based on the results of groundwater sampling at two monitoring wells (MW-2 and MW-8) installed north of the Hiuka property, there are no recognized groundwater contamination issues associated with the Hiuka property, which was the basis for soil closure of the Hiuka property.

In addition to the groundwater remediation described above, groundwater assessment and remediation included installation and monitoring of wells before and after the Site redevelopment, along with removal of free product from several wells since 2002. Recent assessments in response to RWQCB requirements have included evaluations of soil vapor and human health risk, possible intermediate and deeper water-bearing zone (WBZ) impacts, extensive investigations of the Site using cone-penetration testing (CPT) and rapid optical scanning technique (ROST) technologies to better define the occurrence and extent of LNAPL, ongoing assessment of the possible migration of CoCs in the shallow WBZ, and the ongoing remediation comprising free product removal from wells.

## 2.0 STATUS OF INVESTIGATION

The RWQCB presented their comments in the “Status of Investigation” portion of the May 15, 2014, meeting agenda under three general topics, as discussed below. The RWQCB comments have been summarized for each topic, followed by the SCS response. In each instance, SCS disagrees with the RWQCB’s assessment.

### 2.1 PRESENCE OF SOURCES FOR GROUNDWATER IMPACT

The RWQCB noted that, based on the results of Site assessment, particularly the 2011 LASER-induced fluorescence (LIF) ROST investigation, LNAPL is known to be present beneath the Site. Laboratory analysis of the LNAPL samples collected in 2007 from three groundwater monitoring wells located in the northeastern portion of the Site indicated that, along with petroleum hydrocarbons, fuel oxygenates were present. The fuel oxygenates included methyl tertiary-butyl ether (MTBE), tertiary-butyl alcohol (TBA), and tertiary-amyl alcohol (TAA), all of which were noted to be highly soluble and capable of relatively rapid migration in groundwater. Because of the presence of LNAPL, as confirmed by the LIF-ROST investigation of the northeast portion of the Site, the RWQCB recommended further investigation of the LNAPL distribution and evaluation of a remedy of the impacted groundwater.

The investigation and remediation of LNAPL and fuel oxygenates was discussed in the Technical Report, portions of which are presented below:

The Site has been extensively studied and remediated over the nearly 30 years since the RWQCB issued CAO 85-17, and only a minor fraction of the original hydrocarbon plume remains beneath the Site. An estimated \$40 million site-wide remediation program was implemented from May

1998 to October 2000, via AS/SVE, soil treatment, and soil excavation for off-site disposal. That program removed an estimated 12,000,000 pounds of petroleum hydrocarbons; additionally, an estimated 40,000,000 pounds (approximately 350,000 cubic feet) of contaminated soil were removed from the site during construction of the Distribution Center.

During the long history of remediation efforts at the Site, a number of consultants have performed subsurface investigations and remedial actions. Documented work began in 1985 in response to CAO 85-17 and has continued since, including the Site-wide remediation work leading to a "no further action" letter for soil at the Site.

In addition to the groundwater remediation described above, groundwater assessment and remediation included installation and monitoring of wells before and after Site redevelopment, along with removal of free product from several wells since 2002. Recent assessments in response to RWQCB requirements have included evaluation of soil vapor and human health risk, possible intermediate and deeper WBZ impacts, extensive investigations of the Site using CPT and ROST technologies to better define the occurrence and extent of LNAPL, ongoing assessment of the possible migration of CoCs in the shallow WBZ, and ongoing remediation comprising free product removal from wells. Dissolved and phase-separated hydrocarbons have been detected in groundwater wells at the Site. However, the lateral extent of both the dissolved phase and areas where LNAPL accumulates in wells are bounded or can be inferred and appear to be remarkably stable, based on a comparison of historical and current groundwater quality data, as well as significant statistical analyses.

The RWQCB asserts in their analysis attached to their meeting agenda:

"Based on the laser-induced fluorescence rapid optical scanning tool (LIF-ROST) investigation performed in 2011 within the limited areas of the Site, discharged waste[s] are still present in the subsurface as sources for groundwater contamination. Currently, free product is present in groundwater monitoring wells that are located about 750 feet apart (MW-19R, MW-6R, and MW-14R). Presence of free product means that the discharged waste, light non-aqueous phase liquid (LNAPL), is mobile."

SCS disputes, in particular, the RWQCB assertion that the presence of free product in a well means it is mobile. This interpretation is inconsistent with SWRCB guidance developed for the Policy.

LNAPL mobility, stability, and recovery were extensively evaluated in the Technical Report. This evaluation confirmed that the LNAPL plume is stable and confined. A weight of evidence approach, wherein multiple lines of evidence are considered in their totality, was used to assess LNAPL plume stability. These lines of evidence are stated below:

- Confirmation that the LNAPL releases are finite and not ongoing at the Site;
- Evaluation of the relative age of the LNAPL plumes; the older the plume, the more probable it has reached field static equilibrium;
- Evaluation of LNAPL gradients;
- Comparisons of estimated LNAPL to water conductivity values;

- Evaluation of LNAPL flow;
- Review of petrophysical properties, including expectations for an entry pressure threshold; and
- Inspection of LNAPL plume distribution to consider whether the morphology is consistent with the form of a stable plume.

In their 2011 report, AVI concluded:

“In summary, for this particular site, all the factors above point to LNAPL plume stability. While there may be small-scale movement in response to localized gradients, the plume is old enough and displays all the other features of a stable plume relative to site management objectives.”

In 2014, AVI reviewed current information for the Site and concluded:

“Site LNAPL transmissivity values (determined with site specific data) are much lower than the 0.1 to 0.8 ft<sup>2</sup>/day range that the Interstate Technology & Regulatory Council (ITRC) has recommended as a practical endpoint to effective hydraulic LNAPL recovery. Our detailed analysis, using site specific parameters collected by SCS, demonstrates that additional free product recovery will have no measurable beneficial effect. Other remedial options are not viable with the footprint of the Port LA Distribution Center business operations, and are not warranted given the negligible expected benefit, as detailed in our 2011 work. At this late plume stage, natural mass losses likely exceed the failingly small remaining recovery possible through hydraulic recovery.”

As part of the Technical Report’s analysis of the applicability of the Policy to the Site, SCS noted that LNAPL is present in wells in two areas at the Site with the following characteristics:

- “LNAPL conductivity is very low, as is LNAPL velocity, which is estimated at less than 1 foot per year, and possibly less;
- Multiple other lines of evidence point to plume and LNAPL stability, including the age of plume and the plume morphology;
- LNAPL recovery using conventional methods such as hydraulic recovery or even AS/SVE, which were at one time successful in removing mass, are unlikely to induce any significant recovery using conventional designs and well spacings; and
- Existing buildings and current tenant operations constrain the effective implementation of additional remediation measures.”

The RWQCB asserts in their meeting agenda that:

“Fuel oxygenates are highly soluble and migrate rapidly following preferential groundwater flow paths. Since the 2011 LIF-ROST investigation covered only the limited areas of the Site and confirmed the presence of LNAPL, further investigation for a site-wide assessment and remedy of the impacted groundwater are warranted.”

The dissolved-phase plume conditions were extensively discussed in the Technical Report.

Although fuel oxygenates have been identified in the free product samples and in dissolved-phase groundwater samples collected from the free product wells, the results of analysis of groundwater samples collected from the on-Site well network during recent sampling events have indicated that fuel oxygenates (TAA and TBA) were present in only two wells (MW-9R and MW-24). Thus, there is no evidence that fuel oxygenates are widely distributed in dissolved-phase groundwater at the Site or that preferential pathways exist for the migration of fuel oxygenates.

AVI conducted an evaluation of the dissolved and LNAPL plumes with respect to their stability, status, and threat to the waters of the State (AVI, 2011). AVI stated that the purposes of the work regarding the dissolved-phase plume were to:

- “Evaluate the stability, potential longevity, potential impacts to groundwater utilization, and the potential fate and transport of the TBA groundwater plume; and
- Evaluate the stability of the benzene groundwater plume at the Site to assist in evaluating the LNAPL plume stability.”

AVI further indicated:

“The evaluations conducted herein utilize historic groundwater concentration data, in context with other site characterization information, as a key indicator of the historical and future probable plume state. This focus was developed because groundwater is in contact with residual petroleum hydrocarbons, and understanding the stability, potential plume longevity, potential impacts to groundwater utilization, and potential fate and transport of the TBA plume and the stability of the benzene plume in relation to the LNAPL plume directly affect the long-term care requirements and closure.”

AVI provided a summary of key observations with respect to the dissolved phase plume:

- The geospatial mass distributions illustrate plume stability for benzene.
- No wells were observed to exhibit increasing TBA trends, and the wells with sufficient data for a trend analysis exhibited a decreasing trend and reach the regulatory criteria by at the latest 2024 in the wells that are located along the leading edge of the plume. Thus the center of mass of the TBA plume is likely stable and is not moving downgradient.
- Worst-case scenario predictions using the mass flux from the Site to estimate maximum concentrations of TBA at a hypothetical drinking water well result in no impacts above regulatory criteria for TBA. Furthermore, utilization of groundwater from the Gage Aquifer would require treatment to remove naturally occurring dissolved phase constituents. During this treatment process TBA would most certainly be removed from the produced groundwater.
- TBA has not been detected in off-site Phillips 66 well MW-8 and has not been detected above the NL [notification level] (12 µg/L) in off-site well MW-12, both of which are

located directly downgradient of the source area. MW-8 (Phillips 66) and MW-12 have generally been monitored for TBA since it was first detected at the Site (2007); although MW-12 was abandoned in 2009.

- The plume trends and fate and transport analysis suggest that the TBA plume is stable laterally and is attenuating, which is further supported by the absence of detections in downgradient well MW-8 located on the Phillips 66 site.
- As discussed in the main body of the [CAP] report, the TBA plume is also contained vertically by predominantly upward vertical gradients in the Gage Aquifer beneath the site.
- In summary, these various layers of conservatism mirror USEPA risk assessment practices and those of ASTM to provide a direct analysis based on data, rather than models, to assess the safety of site closures under Resolution 92-49. It is estimated that the safety factors involved generate more than 3 orders of conservatism over actual expected conditions.

AVI concluded that:

“Based on the summary of findings above, the TBA plume appears to be stable and contained by natural attenuation processes. This, coupled with the marginal quality groundwater beneath the site suggest that this plume meets State standards for presenting no risk, and no threat to future groundwater use.”

AVI's analysis is consistent with SCS' modeling and previous interpretation of data and lines of evidence.

## 2.2 UNSTABLE GROUNDWATER PLUME

The RWQCB presented total petroleum hydrocarbons (TPH) data from groundwater samples collected from monitoring wells MW-24, MW-20D, and MW-6R, and asserted that the chemical distribution indicates dissolved-phase petroleum hydrocarbons are expanding from the source free product plume.

The vertical extent of CoCs at the Site has been assessed based on sampling data from monitoring wells installed in the intermediate and deeper WBZs. The lack of impacts to the deeper WBZ is consistent with an upward vertical hydraulic gradient that has been calculated between the deep and shallow wells.

It is not clear that the presence of CoCs in MW-24 is conclusive evidence for instability of the dissolved-phase plume. AVI (2014) reviewed the MW-24 data and concluded:

“MW-24 is an intermediate depth well, located in the truck loading area of the PDC (Figure 1, site plan). As seen by the chemical hydrograph for well MW-24 (Figure 2), benzene has been generally decreasing in concentration over time, while there has been a distinct more recent rise in diesel range organics (DRO) concentrations. Benzene is a

compound of concern, DRO itself is not, so the key takeaway is the ongoing expected decline in benzene concentrations is consistent with the expectations of our 2011 work. It is noteworthy that these recent DRO concentrations are well above the solubility limits of diesel fuels (typically less than 6 - 15 mg/l solubility, API 2004), meaning that the results are emulsified and invalid as a quantitative dissolved-phase measure. Therefore the apparent dissolved-phase DRO increases may not in fact be present at levels reported by the lab. However, the increasing concentrations do indicate a change in conditions, and this is of potential concern given the location of MW-24 within the trucking operations area of the PDC. The most obvious source for a new occurrence of diesel at an intermediate groundwater depth at this location is the surface trucking operations. Given the historic nature of the subject plume beneath the PDC, and the absence of significantly changed hydraulics or other conditions, there is no expectation that this DRO increase is a result of natural fate and transport processes, but rather a new and presumably short-term pulse from surface runoff infiltrating the well box. It is always problematic to have direct conduits to the aquifer under conditions where there are surface sources that can add contaminants, which are fundamentally low mass artifacts imprinted on the broader historic plume."

In summary, the diesel-range TPH concentration is not a representative indicator of dissolved-phase migration. Benzene and other CoCs are more appropriate indicators of migration.

The approved repairs to MW-24 have been completed. Continued quarterly sampling of the well will help in evaluation of the CoCs identified in the recent groundwater samples collected from the well.

### 2.3 INCOMPLETE GROUNDWATER DELINEATION

The RWQCB noted that the results of analysis of groundwater samples collected from the new off-Site downgradient monitoring wells MW-26, MW-27, MW-28, and MW-29 indicated the presence of elevated concentrations of TPH and benzene. SCS understands that these results have been interpreted by the RWQCB as evidence that the Site dissolved plume remains mobile and has migrated off-Site. As a result of this interpretation, RWQCB has stated that additional off-Site monitoring wells are needed in the area east of the Site wells with free product. These additional wells are considered necessary to complete the delineation of the dissolved-phase plume.

During the May 15, 2014, meeting, the RWQCB also noted that additional delineation of the free product and dissolved-phase plumes is also needed to the south and west of the known free-product wells.

As noted above, the free product and dissolved-phase plumes have been extensively evaluated and their extent is well-documented. Previous assessments have indicated that the free product plume is limited to the northeast portion of the Site. The generally northeast to east flow direction of the dissolved-phase plume has been consistent throughout the years of groundwater monitoring, both on- and off-Site, and control was provided for much of this period by downgradient wells MW-12 and MW-13.

The southern boundary of the plume was provided by former monitoring well MW-2, which was installed south of 400 Westmont Drive (Building "B" of the Port Distribution Center) in May 1988, and was sampled during 27 groundwater monitoring events. Well MW-2 was abandoned in February 2000. No free product was identified in MW-2, and, with very few exceptions, no CoCs were identified in analyses of groundwater samples collected from the well.

The presence of CoCs in the new downgradient wells was evaluated in the Technical Report. Forensic geochemistry was completed on targeted groundwater monitoring wells to assess possible on- and off-Site sources and impacts to groundwater downgradient of the Site. Zymax, a laboratory specializing in forensic geochemistry, was retained to perform the analysis and interpret the data. Groundwater from an on-Site well (MW-10R) was compared to groundwater downgradient of the Site, and downgradient wells were also compared. The 2014 Zymax report (included as an appendix to the Technical Report) draws the following conclusions:

- "Water sample MW-10R contains dissolved hydrocarbons that most likely represent degraded gasoline.
- MW-26 contains a similar gasoline, and some heavier aromatic hydrocarbons, probably from another source.
- MW-29 contains a different gasoline with the fuel oxygenate DIPE. This gasoline is from a different source than MW-10R.
- The dissolved gasoline in MW-27 appears to be more similar to MW-29, and is probably from the same source as MW29.
- MW-10R also contains degraded diesel or #2 fuel oil that was not detected in MW-26, MW-27, or MW-29."

These data and conclusions suggest that while the gasoline-range TPH in MW-26 is consistent with MW-10R and an on-Site source, the CoCs detected in other wells are, in general, not, and are consistent with a distinct or separate source of release. Furthermore, the results from the intermediate WBZ wells, while consistent with one another, are not consistent with the detected CoCs in the shallow WBZ wells and suggests another source or sources of release, unrelated to the CoCs detected in on-Site wells.

## 2.4 CONCLUSIONS AND RECOMMENDATIONS

In summary, SCS concludes that:

- There is no ongoing source of release and the LNAPL plume is stable.
- The dissolved-phase plume is stable.
- The dissolved-phase plume and extent of LNAPL have been adequately delineated.

Based on the existing record of work conducted at the Site and the discussions subsequent to the submittal of the Technical Report, SCS concludes that the following recommendations from the Technical Report remain valid:

“The Site conditions are consistent with both the Policy and Cleanup Goals. Given the demonstrated plume stability, the absence of risk presented by the immobile LNAPL, and demonstrated absence of health impacts or impacts to beneficial uses or sensitive receptors, SCS requests on behalf of our Client, that the RWQCB close the release case associated with the Site.”

“As was previously stated, even if implementation of active remediation were feasible, the net benefit to water quality and the environment is likely to be minimal given the likely limitations on recovery, the very poor water quality at the Site, and limitations on beneficial uses.”

Exhibit A

RWQCB Meeting Agenda and Supporting Documents



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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**Los Angeles Regional Water Quality Control Board**

**Western Fuel Oil San Pedro Site Meeting  
May 15, 2014**

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**AGENDA**

- Introduction
- Status of Investigation
  - Presence of Sources for Groundwater Impact
  - Unstable Groundwater Plume
  - Incomplete Groundwater Delineation
- Status of Cleanup
  - Soil
  - Sources for Groundwater Impact and Dissolved Plume
- Discussion
  - Paths to Closure

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CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)

## Site History

The Site is comprised of approximately 88 acres and was operated as an oil refinery from approximately 1923 to 1948. Its capacity was in the range of 8,000 to 10,000 barrels per day. The property was then operated as a storage terminal and transfer facility from approximately 1950 to 1995 for residual and heavy fuel oils, automotive fuels and basic chemical stocks. The Site also includes a former 20-acre scrap metal facility that operated from 1986 to 1995.

## Status of Investigation

### Presence of Sources for Groundwater Impact

Based on the laser-induced fluorescence rapid optical scanning tool (LIF-ROST) investigation performed in 2011 within the limited areas of the Site, discharged waste are still present in the subsurface as sources for groundwater contamination. Currently, free product is present in groundwater monitoring wells that are located about 750 feet apart (MW-19R, MW-6R and MW-14R). Presence of free product means that the discharged waste, light non-aqueous phase liquid (LNAPL), is mobile. For these wells, groundwater samples were collected beneath the free product to characterize LNAPL. In addition to the typical petroleum hydrocarbon compounds, fuel oxygenates are present as below indicating remaining LNAPL beneath the Site is a source for groundwater contamination with fuel oxygenates:

Groundwater Monitoring Well	Date Sampled	MTBE ( $\mu\text{g/L}$ )	TBA ( $\mu\text{g/L}$ )	TAA ( $\mu\text{g/L}$ )
MW-6R Shallow	8/9/2007	289	11,900	31,500
MW-6R Deep	8/9/2007	283	13,200	37,900
MW-14R Shallow	8/9/2007	ND <250	18,400	11,200
MW-14R Deep	8/9/2007	ND <250	15,000	9,220
MW-19R Shallow	8/9/2007	ND <500	ND <1,000	1,260

$\mu\text{g/L}$  = Microgram per Liter  
MTBE = Methyl tertiary-butyl ether  
TBA = Tertiary-butyl alcohol  
TAA = Tertiary-amyl alcohol  
ND = Non detect

Fuel oxygenates are highly soluble and migrate rapidly following preferential groundwater flow paths. Since the 2011 LIF-ROST investigation covered only the limited areas of the Site and confirmed the presence of LNAPL, further investigation for a site-wide assessment and remedy of the impacted groundwater are warranted.

### Unstable Groundwater Plume

Concentrations of total petroleum hydrocarbons (TPH) ranging from C10-C28 in the groundwater monitoring well MW-24, located in the internal part of the current groundwater monitoring network, have an increasing trend since 2012 as follows:

Date Sampled MW-24	TPH C10-C28 Concentration ( $\mu\text{g/L}$ )
June 2011	<500
December 2011	<500
May 2012	45,100
December 2012	74,800
June 2013	79,900

A groundwater sample beneath free product was collected in November 2013 from the groundwater monitoring well MW-6R, located about 15 feet away from MW-24, and tested for TPH C10-C28. The data showed that TPH C10-C28 concentration was 2,050,000  $\mu\text{g/L}$ , indicating LNAPL remaining beneath the Site is a source for TPH C10-C28. Since June 2013, a deep groundwater monitoring well MW-20D (screen interval from -83 to -98 feet mean sea level; top of well casing 102 feet above mean sea level), located 120 feet upgradient of MW-6R, was detected with TPH C10-C28 ranging from 642 to 2,710  $\mu\text{g/L}$ , suggesting that the dissolved plume is expanding and continuing impact to groundwater from free product.

Work conducted for MW-24 is as follows:

- 9/11/2013 Workplan for MW-24 source evaluation was approved
- 10/30/2013 To monitor MW-24 quarterly
- 11/14/2013 Well head modification plan for MW-24 was approved

### Incomplete Groundwater Delineation

In January 2014, offsite groundwater monitoring wells MW-26 to MW-29 were monitored for the first time after installation. The results showed elevated concentration of TPH C6-C10 and benzene. Based on recent data and the shallow groundwater flow direction, contaminated plume remains mobile and continues to move offsite. Additional offsite groundwater monitoring wells are warranted in the area directly east of groundwater monitoring wells with free product (MW-6R, MW-14R and MW-19R) to further assess and monitor the extent of the groundwater quality down gradient offsite.

The groundwater monitoring well, MW-19R, is located near the southeastern boundary of the site representing the most upgradient groundwater quality. As noted, free product is present in MW-19R. Additional onsite groundwater monitoring wells are warranted to delineate and monitor both free product and dissolved plumes in areas upgradient and cross-gradient of MW-19R.

California Water Code Section 13267 Order that was issued on February 4, 2010 states... "You have not yet completed site contamination characterization and have not organized site investigation data into a conceptual site model to assess the full extent of the groundwater contamination. The Regional Board needs the required reports in order to complete the vertical and lateral delineation of the groundwater contamination plume and properly implement remedial measures." In compliance with the Order BlackRock installed four offsite downgradient groundwater monitoring wells in December 2013.

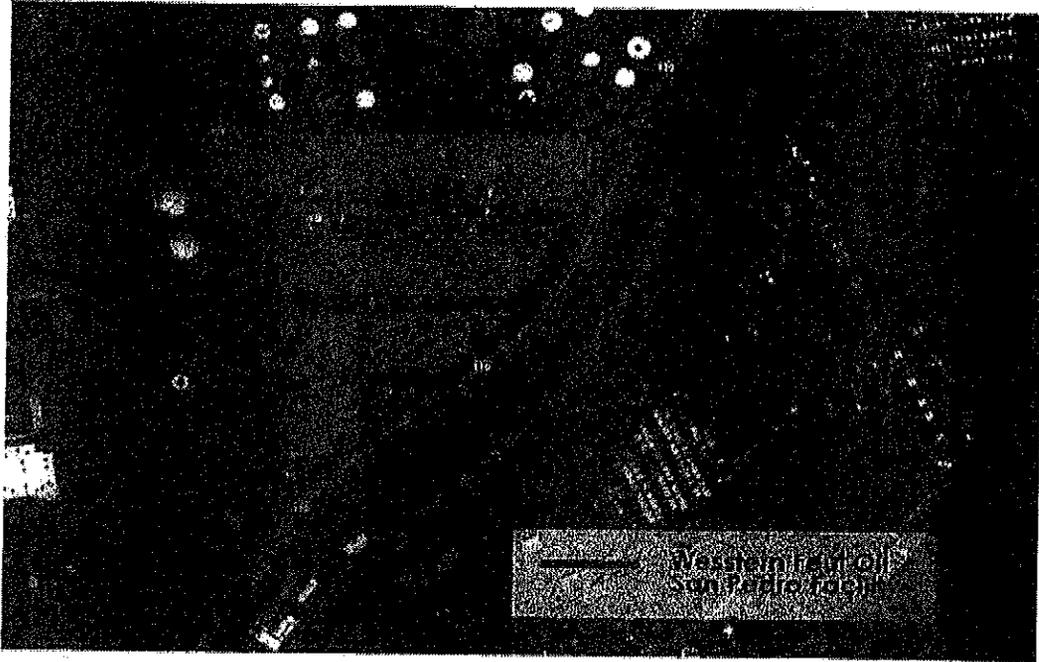
8/21/2012	Workplan for installation of offsite downgradient monitoring wells submitted
12/11/2012	Installation workplan approved
7/11/2013	2 <sup>nd</sup> time extension approved
12/11/2013	Installation report submitted
3/26/2014	Quarterly groundwater monitoring to be performed

Groundwater delineation for dissolved plumes should be completed in order to review adequately the submitted corrective action plan and feasibility study in September 2011.

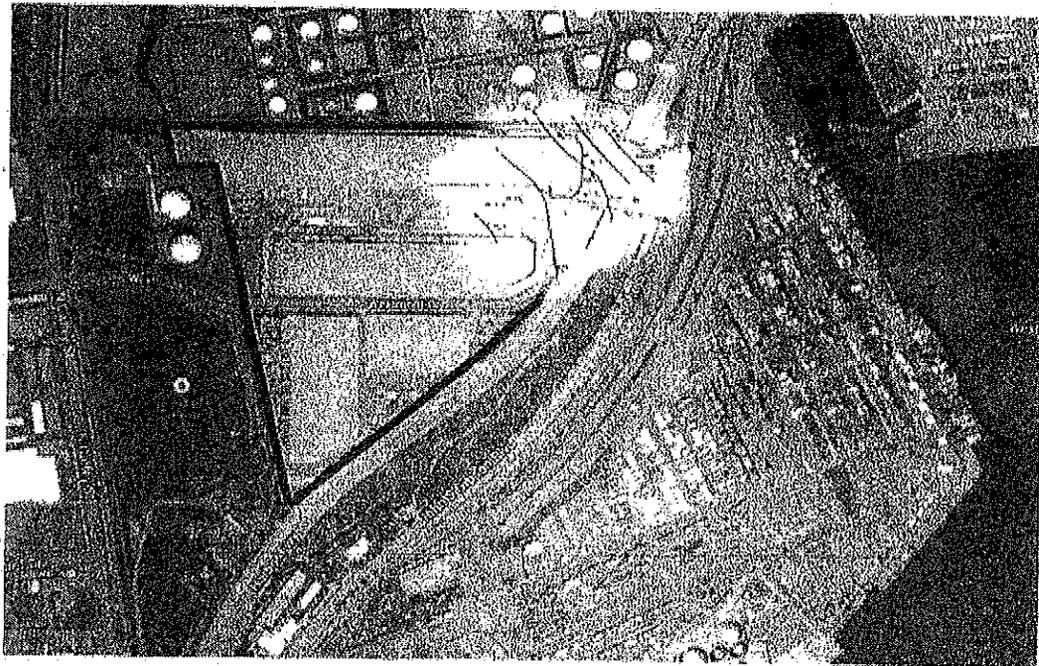
#### **Paths to Closure**

1. A complete delineation of impacted groundwater on and offsite.
2. Set cleanup goals and remediate the impacted groundwater plume.
3. Collect confirmation samples to document that the cleanup is complete.

Site Map

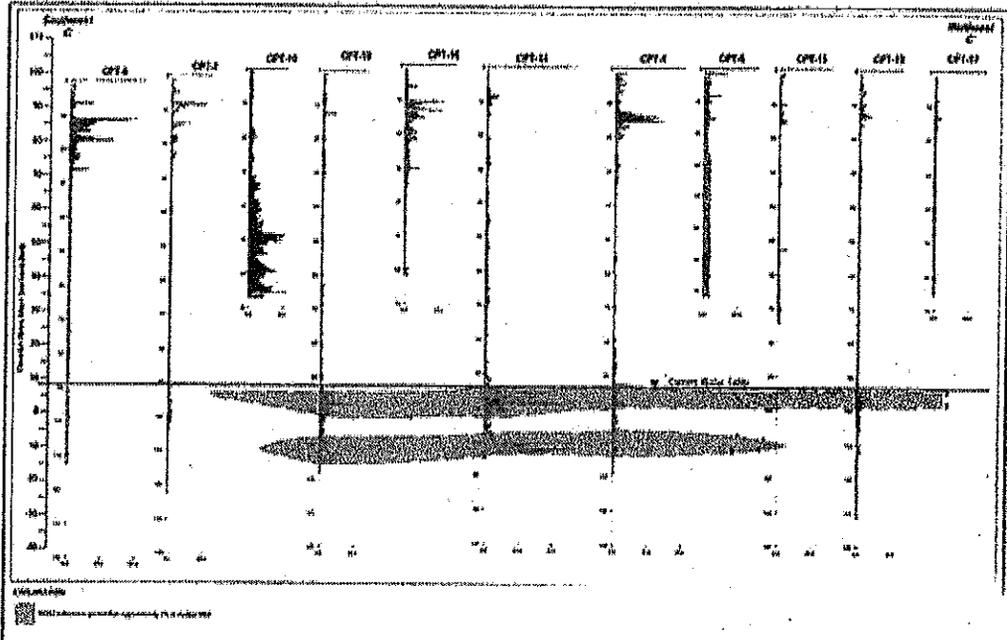


Groundwater Monitoring Wells





# Sources for Groundwater Impact



# **EXHIBIT 5**

11/21/00

16:37

LANDEBANK → 15624257343

NO.587 685



# California Regional Water Quality Control Board

## Los Angeles Region



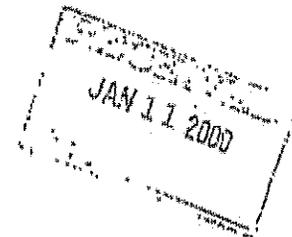
Winston H. Hitecox  
Secretary for  
Environmental  
Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640  
Internet Address: <http://www.cwrqcb.ca.gov/~wrqcb4>

Gray Davis  
Governor

January 7, 2000

Ms. Mary B. Hashem, Project Manager  
LandBank  
141 Union Boulevard, Suite 330  
Lakewood, Colorado 80228



**NO FURTHER ACTION FOR SOIL - FORMER HIUKA AMERICA FACILITY - 2000 NORTH GAFFY STREET, SAN PEDRO (FILE NO. 85-21); SLIC # 352**

Dear Ms. Hashem:

The Los Angeles Regional Water Quality Control Board (Board) staff has received and reviewed the soil remediation report for the Hiuka America Parcel, dated September 16, 1999, prepared by SCS Engineers for the above referenced site. The report provides a summary of the soil remediation that has been completed at the subject portion of the Western Fuel Oil Company facility (WFO).

The site was operated as an oil refinery from approximately 1923 to 1948. Westoil Terminal Company (Westoil) acquired the property in 1950 and operated as a petroleum terminal, storage, and transfer facility. In 1974, WFO leased the site from Westoil and continued to operate the site as a terminal facility until 1995. In 1997, WFO demolished and removed all above and below ground structures to prepare the land for industrial development. To facilitate the restoration and development process, LandBank (the current developer) divided the site into several parcels. The subject parcel is comprised of approximately 20 acres of irregularly shaped land. Between 1986 to 1995, WFO used this parcel for storage and consolidation of scrap metals.

The site is located in a heavily industrialized area near the Port of Los Angeles and is adjacent to the Gaffey Street Sanitation Landfill and the City of LA, Street Maintenance Yard. TOSCO refinery is operating on an adjacent property. Site assessment and remedial investigation activities began at WFO site in 1985 pursuant to the Regional Board's Order No. 85-17. WFO performed numerous site investigations since 1985. In June 1998, SCS Engineers conducted additional soil investigations to characterize the site as a part of a real estate sale transaction for Gaffey Street Venture Company. In 1998, Gaffey Street Venture purchased the WFO site and contracted LandBank for the development of the site. Regional Board staff has concluded that an adequate number of samples were taken and analyzed for PAHs, PCBs, metals, TRPH and VOCs and the soil contamination was adequately characterized. Elevated levels of metals, mostly chromium, lead, and arsenic were found in the soil.

In June 1999, excavation and removal of contaminated soil was conducted in accordance with a workplan approved by the Board staff in May 7, 1999. Approximately 2,200 tons of contaminated soils were removed from the subject parcel. Following removal of the contaminated soils, confirmatory samples were analyzed for TTLC, STLC, and TCLP metals, as well as PCBs, TRPH, and VOCs. All remaining concentrations of these contaminants, except

Ms. Mary Hashem

- 2 -

01/07/00

arsenic, met this Regional Board's soil screening criteria established in the "Interim Site Assessment and Cleanup Guidebook", dated May 1996. Extraction tests, performed by SCS Engineers for the arsenic present in the soil at the site, indicate that it will not leach into the groundwater.

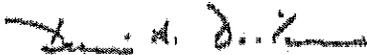
LandBank performed a risk-based corrective action evaluation to assess the impact of residual arsenic contamination in the soil on human health and the environment. The evaluation report was sent to the Office of Environmental Health Hazard Assessment (OEHHA), Hazardous Waste Toxicology Section, for review on December 15, 1999. Dr. David Siegel of the OEHHA office reviewed the evaluation report and concluded in his letter, dated December 22, 1999, that health risks from exposure to arsenic in the soil exposed at the surface were shown to be very low (one in one-million). Dr. Siegel further concluded that if the site is covered with asphalt or concrete, health risks from exposure to residual arsenic are even lower or non-existent.

WFO implemented a semiannual groundwater monitoring and reporting program in 1988 per Regional Board Order No. 85-17. The program consists of fluid-level monitoring and laboratory analyses of groundwater samples for VOCs, VFHC, MTBE, and metals. Arsenic has not been detected in the groundwater beneath the site.

It was stated in your letter, dated December 1, 1999, that this property would be developed for industrial use only, consistent with zoning and surrounding property use. Following development, the graded site will be entirely covered with impervious material, including building footprints and asphalt paved parking areas and driveways.

Based on the information provided, past work completed, and with the provision that the information provided to this agency was accurate and representative of site conditions, we have determined that no further action is necessary for the soil at the subject site. Please note that LandBank will continue the groundwater remediation and monitoring and reporting program until a cleanup goal is achieved. If you have any questions regarding this matter, please contact Manjulika Chakrabarti at (213) 576-6722.

Sincerely,



Dennis A. Dickerson  
Executive Officer

Dennis Dasker, Chief  
Groundwater Protection Division

cc: Julio Nuno -- SCS Engineers  
Doug Carlton -- Construction Consulting Services  
Dr. Siegel - OEHHA

# **EXHIBIT 6**

Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters.

WATERSHED*	WBD No.	MUN	IND	PROC	AG	FR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	ESTUAR	MIL	DIOL	RARE	MIG	SP	W	SH	HELL	WET	
<b>VENTURA COUNTY COASTAL STREAMS</b>																									
Los Salobres Creek	180701010202	P*																							
Poverly Canyon	180701010202	P*																							
Madrano Canyon	180701010202	P*																							
Lavon Canyon	180701010202	P*																							
Palmer Jean Canyon	180701010202	P*																							
McGrath Lake	180701010202	P*																							
Big Sycamore Canyon Creek	180701040201	P*																							
Little Sycamore Canyon Creek	180701040202	P*																							
<b>VENTURA RIVER WATERSHED</b>																									
Ventura River Estuary	180701010105																								
Ventura River Reach 1 (Ventura River Eschey to Main St.)	180701010105	P*																							
Ventura River Reach 2 (Main St. to Webber Canyon)	180701010105	P*																							
Castaña Larga	180701010105	P*																							
Lake Castitas	180701010105	E																							
Lake Castitas tributaries	180701010105	E*																							
Ventura River Reach 3 (Weldon Canyon to Castitas Vista Rd.)	180701010105	P*																							
Ventura River Reach 4 (Castitas Vista Rd. to San Antonio Creek)	180701010105	P*																							
Ventura River Reach 4 (San Antonio Creek to Camino Chabo Rd.)	180701010104	E																							
Coyote Creek	180701010105	P*																							
San Antonio Creek (Ventura River Reach 4 to Lion Creek)	180701010103	E																							
San Antonio Creek (above Lion Creek)	180701010103	E																							
Lion Creek	180701010103	F																							
Reeves Creek	180701010103	F																							
Minor Lake	180701010104	P*																							
Ojai Wetland	180701010104	P*																							
Ventura River Reach 5 (above Camino Chabo Rd.)	180701010104	E																							
Mallija Creek Reach 1 (Ventura River Reach 5 to Mallija Reservoir)	180701010101	P*																							
Mallija Creek Reach 2 (above Mallija Reservoir)	180701010101	P*																							
Munifeta Canyon Creek	180701010101	P*																							
North Fork Mallija Creek	180701010102	E*																							
Mallija Reservoir	180701010101	E																							

Footnotes are consistent for all beneficial use tables.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.

c: Coastal waterbodies which are also listed in Inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).

e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.

f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.

g: Condor refuge.



Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	WBD No.	MUN	IND	PRO	CA	GR	FR	SH	NAV	PO	CO	MM	AQ	MA	CO	LD	SA	ES	MA	ML	BI	OL	RA	RE	MI	GR	SP	MS	HE	LI	WE	†			
<b>SANTA CLARA RIVER WATERSHED (Cont.)</b>																																			
Sespe Creek (Santa Clara River R3 to gauging station below Little Sespe Creek)	180701020706	P	E	E	E	E	E																												
Timber Creek	180701020703	P*																																	
Bear Canyon	180701020703	P*																																	
Timi Creek	180701020703	P*																																	
Piedra Blanca Creek	180701020703	P*																																	
Lion Canyon	180701020702	P*																																	
Rose Valley Creek	180701020702	P*																																	
Howard Creek	180701020702	P*																																	
Tule Creek	180701020702	P*																																	
Portero John Creek	180701020701	P*																																	
Hopper Creek	180701020691	P	E	E	E	E	E																												
Piru Creek (Santa Clara River R4A to Santa Paula Water Works Diverston Dam)	180701020504	P	E	E	E	E	E																												
Lake Piru	180701020503	P	E	E	E	E	E																												
Lake Piru	180701020503	P	E	E	E	E	E																												
Pyramid Lake	180701020506	E																																	
Gorman Creek	180701020507	F																																	
Canada de los Alamos	180701020506	F																																	
Lockwood Creek	180701020504	F																																	
Lockwood Creek	180701020504	F																																	
Tapo Canyon	180701020403	P*																																	
Castaic Creek (Santa Clara River R5 to Castaic Lake)	180701020306	I	I	I	I	I	I																												
Castaic Creek (Castaic Lake to Fish Canyon)	180701020305	I	I	I	I	I	I																												
Castaic Creek (above Fish Canyon)	180701020304	E*																																	
Castaic Lagoon	180701020306	E*																																	
Castaic Lake	180701020304	E	E	E	E	E	E																												
Castaic Lake	180701020304	E	E	E	E	E	E																												
Elizabeth Forebay	180701020305	E	E	E	E	E	E																												
Elizabeth Lake Canyon	180701020304	I	I	I	I	I	I																												
San Francisco Canyon	180701020402	P*																																	
San Francisco Canyon	180701020402	P*																																	
Drinkwater Reservoir	180701020401	E	E	E	E	E	E																												
South Fork Santa Clara River	180701020401	E	E	E	E	E	E																												
Bouquet Canyon (Santa Clara River R6 to Vasquez Canyon)	180701020401	P	P	P	P	P	P																												
Bouquet Canyon (above Vasquez Canyon)	180701020401	P	P	P	P	P	P																												
Dry Canyon Reservoir	180701020202	I	I	I	I	I	I																												
Dry Canyon Reservoir	180701020201	E	E	E	E	E	E																												
Bouquet Reservoir	180701020201	E	E	E	E	E	E																												
Mini Canyon Creek Reach 1 (Santa Clara River R7 to Rowler Canyon)	180701020106	F																																	
Mini Canyon Creek Reach 2 (above Rowler Canyon)	180701020105	F																																	
Agua Dulce Canyon Creek (Santa Clara River R8 to Escondido Canyon Rd.)	180701020104	F																																	
Agua Dulce Canyon Creek (above Escondido Canyon Rd.)	180701020104	F																																	
Also Canyon Creek	180701020101	F																																	
Lake Hughes	180701020301	P	P	P	P	P	P																												
Munz Lake	180701020301	P	P	P	P	P	P																												
Lake Elizabeth	180701020301	P	P	P	P	P	P																												

Footnotes are consistent for all beneficial use tables.

- E: Existing beneficial use
- P: Potential beneficial use
- I: Intermittent beneficial use
- E, P, and I: shall be protected as required.
- \* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details).
- †: Out of service.



Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	MUN.	IND.	PROC.	AGR.	W/FRSH	NAV.	FOW.	COMM.	AQUA.	WAR.	WCOLT.	SAL.	EST.	MAR.	WIL.	ESICL.	RARE	BIRGS.	P/MSH.	WET	
MED. No.																					
LOS ANGELES COUNTY COASTAL STREAMS																					
Arroyo Seguit	180701040202	P																			
San Nicholas Canyon Creek	180701040202	P																			
Los Altos Canyon Creek	180701040202	P																			
Ladnusa Canyon Creek	180701040202	P																			
Encinal Canyon Creek	180701040203	E																			
Francis Canyon Creek	180701040203	E																			
Duane Lagoon	180701040204	F																			
Duane Creek (Zuma Canyon)	180701040204	F																			
Ramirez Canyon Creek	180701040204	F																			
Escorrido Canyon Creek	180701040204	F																			
Laligo Canyon Creek	180701040204	F																			
Solsitca Canyon Creek	180701040204	F																			
Puerto Canyon Creek	180701040204	F																			
Corral Canyon Creek	180701040204	F																			
Carlin Canyon Creek	180701040403	P																			
Las Flores Canyon Creek	180701040403	P																			
Piedra Concha Canyon Creek	180701040403	P																			
Pena Canyon Creek	180701040403	P																			
Tuna Canyon Creek	180701040403	P																			
Tocanga Lagoon	180701040401	P																			
Tonpanca Canyon Creek	180701040401	P																			
Santa Ynez Canyons	180701040403	P																			
Santa Ynez Lake (Lake Shrine)	180701040403	P																			
Santa Monica Canyon Channel	180701040402	P																			
Rustic Canyon Creek	180701040402	P																			
Sullivan Canyon Creek	180701040402	P																			
Mendocino Canyon Creek	180701040402	P																			
Coastal Streams of Palos Verdes	180701040300	P																			
Canyon Stream of Palos Verdes	180701040701	P																			
Bobby Slough	180701040701	P																			
Mechabo Lake	180701040701	P																			
Madrona Marsh	180701040701	P																			
Stone Canyon Reservoir	180701040300	E																			
Hollywood Reservoir	180701040300	E																			
Franklin Canyon Reservoir	180701040300	E																			
Upper Franklin Canyon Reservoir	180701040300	E																			

Footnotes are consistent for all beneficial use tables.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Interim beneficial use  
 E, P, and I: shall be protected as required.

\* A risked MUN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details).

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.

c: Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).

d: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.

e: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.

f: Rare applies only to Agua Magna canyon and Sepulveda Canyon areas.

u: This reservoir is covered and thus inaccessible.

Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	WBD No.	MLN	IND	PROCK	GRW	FRESH	NAV	POND	COMM	AQUA	WARM	COLD	SAL	EST	MAP	WIL	DEB	OL	PAR	MG	SF	PH	SHELL	WET	
<b>MALIBU CREEK WATERSHED</b>																									
Malibu Lagoon	180701040104																								
Malibu Creek	180701040104	P					E																		
Cold Creek	180701040104	P																							
Las Virgenes Creek	180701040104	P																							
Century Reservoir	180701040104	P																							
Malibu Lake	180701040102	P																							
Medea Creek Reach 1 (Malibu Lake to Lindero Creek Reach 1)	180701040102	P																							
Medea Creek Reach 2 (above Lindero Creek Reach 1)	180701040104	P																							
Lindero Creek Reach 1 to Lake Lindero	180701040102	P																							
Lindero Creek Reach 2 (above Lake Lindero)	180701040102	P																							
Turmito Creek Reach 1 (Malibu Lake to Lobo Canyon)	180701040101	P																							
Turmito Creek Reach 2 (Lobo Canyon to Westlake Lake)	180701040101	P																							
Westlake Lake	180701040101	P																							
Potters Valley Creek	180701040101	P																							
Lake Eleanor Creek	180701040101	P																							
Lake Eleanor	180701040101	P																							
Las Virgenes (Westlake) Reservoir	180701040101	P																							
Hobson Valley Creek	180701040101	P																							
Lake Sherwood	180701040101	P																							
<b>BALLONA CREEK WATERSHED</b>																									
Ballona Creek Estuary (ends at Carifinda Creek)	180701040300																								
Ballona Lagoon/Venture Canals	180701040303																								
Ballona Wetlands	180701040300																								
Del Rey Lagoon	180701040500																								
Ballona Creek Reach 2 (Estuary to National Blvd.)	180701040300	P																							
Ballona Creek Reach 1 (above National Blvd.)	180701040300	P																							
<b>LOS CERRITOS CHANNEL WATERSHED</b>																									
Los Cerritos Wetlands	180701040702																								
Los Cerritos Channel Estuary (Ends at Anaheim Rd.)	180701040702	P																							
Sims Pond	180701040702	P																							
Los Cerritos Channel	180701040702	P																							
Coloade Lagoon	180701040702	P																							

Footnotes are consistent for all beneficial use tables.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

b. Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.

c. Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).

e. One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.

f. Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.

w. These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.

av. The High Flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. Water quality objectives set to protect (1) either recreational uses associated with the fishable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.

\*\* The dividing line between "Ballona Creek" and "Ballona Creek to Estuary" is the point at which the vertical channel walls transition to sloping walls.

Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	WSD No.	MUN	IND	PROC	AG	FRESH	NAV	FOUR	CO	AQUA	WARM	COLD	SALES	WATER	DE	OL	RARE	BI	GR	SP	SH	HELL	WET
<b>DOMINGUEZ CHANNEL WATERSHED</b>																							
Dominguez Channel Estuary (Ends at Vermont Ave.)	180701060102	P*																					
Dominguez Channel (Estuary to 139th St.)	180701060102	P*																					
Dominguez Channel (above 139th St.)	180701060101	P*																					
<b>LOS ANGELES RIVER WATERSHED</b>																							
Los Angeles River Estuary (Ends at Wilcox St.)	180701050402	P*																					
Los Angeles River Reach 1 (Estuary to Carson St.)	180701050402	P*																					
Compton Creek	180701050402	P*																					
Los Angeles River Reach 2 (Carson St. to Rio Hondo Reach 1)	180701050402	P*																					
Los Angeles River Reach 2 (Rio Hondo Reach 1 to Plummer St.)	180701050401	P*																					
Rio Hondo Reach 1 (Los Angeles River Reach 1 to Plummer St.)	180701050303	P*																					
Rio Hondo Reach 2 (Santa Ana Freeway to Whittier Narrows Dam)	180701050303	P*																					
Rio Hondo Reach 3 (above Whittier Narrows Dam)	180701050302	P*																					
Alhambra Wash	180701050303	P*																					
Rubio Wash	180701050303	P*																					
Rabbit Canyon	180701050301	P*																					
Eaton Wash	180701050301	P*																					
Eaton Wash (below dam) (Rio Hondo Reach 3 to Eaton Dam)	180701050301	P*																					
Eaton Wash (above dam) (Eaton Dam to Mount Wilson Toll Rd.)	180701050301	P*																					
Eaton Reservoir	180701050301	P*																					
Eaton Canyon Creek (above Mount Wilson Toll Rd.)	180701050301	P*																					
Arcadia Wash	180701050302	P*																					
Arcadia Wash	180701050302	P*																					
Santa Anita Wash (lower) (Rio Hondo Reach 3 to Elkins Ave.)	180701050302	P*																					
Santa Anita Wash (upper) (Elkins Ave. to Big Santa Anita Reservoir)	180701050302	P*																					
Little Santa Anita Canyon Creek	180701050302	P*																					
Big Santa Anita Reservoir	180701050302	P*																					
Santa Anita Canyon Creek	180701050302	P*																					
Winter Creek	180701050302	P*																					
East Fork Santa Anita Canyon	180701050302	P*																					
Sawpit Wash	180701050302	P*																					
Sawpit Canyon Creek	180701050302	P*																					
Sawpit Reservoir	180701050302	P*																					
Mojave Canyon Creek	180701050302	P*																					
Arroyo Seco Reach 1 (Los Angeles River Reach 2 to Holly St.)	180701050209	P*																					
Arroyo Seco Reach 2 (Holly St. to Devils Gate Dam)	180701050209	P*																					
Devils Gate Reservoir (lower)	180701050209	P*																					
Devils Gate Reservoir (upper)	180701050209	P*																					
Arroyo Seco Reach 3 (above Devils Gate Dam)	180701050209	P*																					
Alhambra Canyon Creek	180701050209	P*																					
El Prado Canyon Creek	180701050209	P*																					
Little Bear Canyon Creek	180701050209	P*																					
Los Angeles River Reach 3 (Plummer St. to Riverside Dr.)	180701050207	P*																					
Vesadego Wash Reach 1 (Los Angeles River Reach 3 to Vesadego Rd./Towers St.)	180701050207	P*																					
Vesadego Wash Reach 2 (above Vesadego Rd. @ Tower St.)	180701050207	P*																					
Stover Canyon	180701050207	P*																					
Pickens Canyon	180701050207	P*																					
Shields Canyon	180701050207	P*																					

Footnotes are consistent for all beneficial use tables.

- a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b. Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
- c. Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).
- d. One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- e. Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- f. Access prohibited by Los Angeles County Department of Public Works.
- g. These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.

Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	WED No.	MUN	IND	PRO	AGR	W/FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SALES	RECRE	MIL	BIO	RAVEN	IGS	SP	W/SH	NET
<b>LOS ANGELES RIVER WATERSHED (cont.)</b>																					
Dunsmore Canyon Creek	180701050207	I	I	I	I	I															
Burbank-Western Channel	180701050208	P*																			
La Tuna Canyon Lateral and Creek	180701050208	P*																			
Tujunga Wash	180701050208	P*																			
Hansen Flood Control Basin & Lakes	180701050105	P*																			
Lopez Canyon Creek	180701050105	P*																			
Little Tujunga Canyon Creek	180701050104	P*																			
Kagel Canyon Creek	180701050104	P*																			
Big Tujunga Canyon Creek (Hansen Flood Control Basin to Big Tujunga Reservoir)	180701050105	P*																			
Big Tujunga Canyon Creek (above Big Tujunga Reservoir)	180701050103	P*																			
Upper Big Tujunga Canyon Creek	180701050103	P*																			
Haines Canyon Creek	180701050105	P*																			
Vaquero Creek	180701050105	P*																			
Clear Creek	180701050105	P*																			
Big Tujunga Reservoir	180701050105	P*																			
Mill Creek	180701050102	P*																			
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	180701050208	P*																			
Pacoima Wash	180701050206	P*																			
Pacoima Reservoir	180701050205	P*																			
Pacoima Canyon Creek	180701050205	P*																			
May Canyon Creek	180701050205	P*																			
Wilson Canyon Creek	180701050204	P*																			
Stanton Canyon Creek	180701050206	P*																			
Los Angeles River Reach 5 (Sepulveda Dam to Balboa Blvd.)	180701050208	P*																			
Sepulveda Flood Control Basin	180701050208	P*																			
Bull Creek	180701050204	P*																			
Los Angeles Reservoir	180701050204	E																			
Lower Van Norman Reservoir	180701050204	E																			
Upper Van Norman Reservoir	180701050204	E																			
Los Angeles River Reach 6 (above Balboa Blvd.)	180701050206	E*																			
Caballero Creek	180701050208	P*																			
Aliso Canyon Wash (Los Angeles River Reach 6 to State Hwy 118)	180701050203	P*																			
Aliso Canyon Creek (above State Hwy 118)	180701050203	P*																			
Linnet Canyon Wash	180701050203	P*																			
Browns Canyon Wash (Los Angeles River Reach 6 to State Hwy 118)	180701050202	P*																			
Browns Canyon Creek (above State Hwy 118)	180701050202	P*																			
Arroyo Calabasas	180701050201	P*																			
Dry Canyon Creek	180701050201	P*																			
McCoy Canyon Creek	180701050201	P*																			
Bell Creek	180701050201	P*																			
Chatsworth Reservoir*	180701050201	E																			
Dayton Canyon Creek	180701050201	P*																			

Footnotes are consistent for all beneficial use tables.  
 a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.  
 b. Waterbodies designated as WEI may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.  
 c. This reservoir is covered and thus inaccessible.  
 y. Currently dry and no plans for restoration.

Los Angeles Regional Water Quality Control Board

Table 2-1. Beneficial Uses of Inland Surface Waters (Continued)

WATERSHED*	WED No.	MUN IND PROG AGR SW FRESH NAV POW COMM AQUA WARM COOL SAL EST MAR WIL DES CO RARE MIG RES P WASH SHELL WET
<b>LOS ANGELES RIVER WATERSHED (cont)</b>		
<b>ISOLATED LAKES AND RESERVOIRS:</b>		
Engle Rock Reservoir	180701050402	
Edisto Lake	180701050200	P
El Dorado Lakes	180701050600	P
Elysian Reservoir	180701050403	E
Erchemo Reservoir	180701050208	E
Jewett Reservoir	180701050209	E
Lincold Park Lake Silver Reservoir	180701050403	E
Silver Lake Reservoir	180701050200	E
Toluca Lake	180701050208	E
<b>SAN GABRIEL RIVER WATERSHED</b>		
San Gabriel River Estuary (Leads to Willow Slough)	180701050805	E
Coyote Creek (San Gabriel River Estuary to La Canada Versus Creek)	180701050805	E
Coyote Creek (Above La Canada Versus Creek)	180701050803	E
San Gabriel River Reach 1 (San Gabriel River Estuary to Firestone Blvd.)	180701050803	E
San Gabriel River Reach 2 (Firestone Blvd. to Whittier Narrows Dam)	180701050802	E
Whittier Narrows Flood Control Basin	180701050803	E
Legg Lake	180701050803	E
San Gabriel River Reach 3 (Whittier Narrows Dam to San Jose Creek)	180701050801	E
San Gabriel River Reach 3 (San Jose Creek to Ramona Blvd.)	180701050801	E
San Jose Creek Reach 1 (San Gabriel River Reach 3 to Temple Ave.)	180701050502	E
San Jose Creek Reach 2 (Temple Ave. to Thompson Wash)	180701050502	E
Puente Creek	180701050501	E
Thompson Wash (San Jose Creek Reach 2 to Web Canyon)	180701050501	E
Thompson Creek (above Web Canyon)	180701050501	E
Thompson Creek Reservoir	180701050402	E
Walnut Creek Wash	180701050402	E
Big Dalton Wash	180701050402	E
Big Dalton Canyon Creek	180701050402	E
Mysac Canyon	180701050402	E
Big Dalton Reservoir	180701050402	E
Bell Canyon Creek	180701050402	E
Little Dalton Wash	180701050402	E
Little Dalton Canyon Creek	180701050402	E
San Dimas Wash (lower) (Big Dalton Wash to Ham Canyon)	180701050401	E
San Dimas Wash (upper) (above Ham Canyon)	180701050401	E
San Dimas Reservoir	180701050401	E
San Dimas Canyon Creek	180701050401	E
West Fork San Dimas Canyon	180701050401	E
Wicks Hill Canyon	180701050401	E
Puddingstone Reservoir	180701050402	E
Live Oak Wash	180701050402	E
Live Oak Creek	180701050402	E
Live Oak Reservoir	180701050402	E
Puddingstone Wash	180701050402	E
Marshall Creek and Wash (Puddingstone Reservoir to Via Arroyo)	180701050402	E

Footnotes are consistent for all beneficial use tables.

- a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b. Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
- c. Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).
- e. One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- f. Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- w: These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.
- at: This reservoir is covered and thus inaccessible.



Los Angeles Regional Water Quality Control Board

Table 2-1a. Beneficial Uses of Inland Surface Waters.

WATERSHED*	WBD No.	REC1	REC2	REC3	REC4	High Flow Suspension
<b>VENTURA COUNTY COASTAL STREAMS</b>						
Los Sauces Creek	180701010202	I				
Powery Canyon	180701010202	I				
Madriano Canyon	180701010202	I				
Jacon Canyon	180701010202	I				
Pierre Jean Canyon	180701010202	I				
McGrath Lake	180701010202	Ed				
Big Sycamore Canyon Creek	180701040201	I				
Little Sycamore Canyon Creek	180701040202	I				
<b>VENTURA RIVER WATERSHED</b>						
Ventura River Estuary	180701010106	E				
Ventura River Reach 1 (Ventura River Estuary to Main St.)	180701010108	E				
Ventura River Reach 2 (Main St. to Weldon Canyon)	180701010106	E				
Catada Larga	180701010106	I				
Lake Casillas	180701010105	PL				
Lake Casillas tributaries	180701010105	E				
Ventura River Reach 3 (Weldon Canyon to Casitas Vista Rd.)	180701010106	E				
Ventura River Reach 4 (Casitas Vista Rd. to San Antonio Creek)	180701010105	E				
Ventura River Reach 4 (San Antonio Creek to Camino Cielo Rd.)	180701010104	E				
Coyote Creek	180701010105	P				
San Antonio Creek (Ventura River Reach 4 to Lion Creek)	180701010106	E				
San Antonio Creek (above Lion Creek)	180701010103	E				
Lion Creek	180701010103	I				
Reeves Creek	180701010103	I				
Minor Lake	180701010104	P				
Ojai Wetland	180701010104	P				
Ventura River Reach 5 (above Camino Cielo Rd.)	180701010104	E				
Matilija Creek Reach 1 (Ventura River Reach 5 to Matilija Reservoir)	180701010101	E				
Matilija Creek Reach 2 (above Matilija Reservoir)	180701010104	E				
Murieta Canyon Creek	180701010101	E				
North Fork Matilija Creek	180701010101	E				
Matilija Reservoir	180701010101	E				

Footnotes are consistent for all beneficial use tables.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

c. Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).

d. Limited public access precludes full utilization.

h. Water contact recreational activities prohibited by Casitas MWD.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Intermittent beneficial use  
 E, P, and I: shall be protected as required.  
 \* Asterisked MIN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details).

Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	WBD No.	REC1	REC-1	REC2	High Flow Suspension
<b>SANTA CLARA RIVER WATERSHED</b>					
Santa Clara River Estuary (Ends at Harbor Blvd.)	180701020994	E			
Santa Clara River Reach 1	180701020994	E			
Santa Clara River (Estuary to Highway 101 bridge)	180701020994	E			
Santa Clara River Reach 2	180701020993	E			
Santa Clara River (Elsworth Barranca to Freeman Diversion)	180701020993	E			
Santa Clara River Reach 3	180701020993	E			
Santa Clara River (Freeman Diversion Dam to Santa Paula Creek)	180701020992	E			
Santa Clara River (Santa Paula Creek to Sespe Creek)	180701020992	E			
Santa Clara River (Sespe Creek to A Street, Fillmore)	180701020992	E			
Santa Clara River Reach 4A	180701020992	E			
Santa Clara River (A Street, Fillmore to Pisu Creek)	180701020992	E			
Santa Clara River Reach 4B	180701020403	E			
Santa Clara River (Pisu Creek to Blake Cut gaging station)	180701020403	E			
Santa Clara River Reach 5	180701020403	E			
Santa Clara River (Blake Cut gaging station to West Pier Highway 99)	180701020403	E			
Santa Clara River Reach 6	180701020107	E			
Santa Clara River (West Pier Highway 99 to Bouquet Canyon Rd.)	180701020107	E			
Santa Clara River Reach 7	180701020107	E			
Santa Clara River (Bouquet Canyon Rd. to Lang gaging station)	180701020107	E			
Santa Clara River Reach 8	180701020105	E			
Solaced Canyon (Lang gaging station to Agua Dulce Canyon Creek)	180701020105	E			
Solaced Canyon (Agua Dulce Canyon Creek to Alfiso Canyon Creek)	180701020102	E			
Solaced Canyon (above Alfiso Canyon Creek)	180701020102	E			
Santa Clara River Reach 9	180701020901	E			
Santa Paula Creek (above Santa Paula Water Works Diversion Dam)	180701020901	E			
Santa Clara River Reach 10	180701020705	E			
Sespe Creek (gaging station below Little Sespe Creek to Hot Springs Canyon)	180701020705	E			
Sespe Creek (Hot Springs Canyon to Piedad Blanca Creek)	180701020702	E			
Sespe Creek (Piedad Blanca Creek to Patreano John Creek)	180701020701	E			
Sespe Creek (above Patreano John Creek)	180701020503	E			
Santa Clara River Reach 11	180701020602	E			
Pisu Creek (gaging station below Santa Felicia Dam to Agua Blanca Creek)	180701020602	E			
Pisu Creek (Agua Blanca Creek to Pyramid Lake)	180701020508	E			
Pisu Creek (Pyramid Lake to Snowy Creek)	180701020505	E			
Pisu Creek (Snowy Creek to Lockwood Creek)	180701020502	E			
Pisu Creek (above Lockwood Creek)	180701020901	E			
Santa Paula Creek (Santa Clara River R44 to Santa Paula Water Works Diversion Dam)	180701020901	E			
Sespe Creek					

E: Existing beneficial use

P: Potential beneficial use

I: Intermittent beneficial use

E, P, and I: shall be protected as required.

Footnotes are consistent for all beneficial use tables.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

c. Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).

d. Limited public access precludes full utilization.

Los Angeles Regional Water Quality Control Board

Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued)

WATERSHED <sup>a</sup>	WBD No.	RECT	REC-1	REC-2	High Flow Suspension
<b>SANTA CLARA RIVER WATERSHED (Cont'd)</b>					
Sespe Creek (Santa Clara River R3 to gauging station below Little Sespe Creek)	180701020706	E		E	
Timber Creek	180701020703	E		E	
Bear Canyon	180701020703	E		E	
Troul Creek	180701020703	E		E	
Piedra Blanca Creek	180701020702	E		E	
Lion Canyon	180701020702	E		E	
Rose Valley Creek	180701020702	E		E	
Howard Creek	180701020702	E		E	
Tule Creek	180701020701	E		E	
Potrero John Creek	180701020801	E		E	
Popper Creek	180701020801	E		E	
Prun Creek (Santa Clara River R4A to Santa Paula Water Works Diversion Dam)	180701020804	E		E	
Lake Pisu	180701020803	E		E	
Lake Pisu	180701020803	E		E	
Pyramit Lake	180701020809	E		E	
Gorman Creek	180701020807	I		I	
Canada de los Alamos	180701020806	I		I	
Lockwood Creek	180701020804	I		I	
Lockwood Creek	180701020804	I		I	
Tapo Canyon	180701020403	P		E	
Castaic Creek (Santa Clara River R5 to Castaic Lake)	180701020306	I		E	
Castaic Creek (Castaic Lake to Fish Canyon)	180701020305	I		E	
Castaic Creek (above Fish Canyon)	180701020304	I		E	
Castaic Lagoon	180701020308	E		E	
Castaic Lake	180701020305	E		E	
Castaic Lake	180701020304	E		E	
Elizabeth Forebay	180701020304	EK		E	
San Francisco Canyon I	180701020402	I		E	
Drakwater Reservoir	180701020402	I		E	
South Fork Santa Clara River	180701020401	PK		E	
Bouquet Canyon (Santa Clara River R6 to Vasquez Canyon)	180701020401	Em		E	
Bouquet Canyon (above Vasquez Canyon)	180701020401	Em		E	
Dry Canyon Creek	180701020202	I		E	
Dry Canyon Reservoir	180701020201	PK		E	
Bouquet Reservoir	180701020201	PK		E	
West Canyon Creek Reach 1 (Santa Clara River R7 to Rowher Canyon)	180701020106	Im		E	
West Canyon Creek Reach 2 (above Rowher Canyon)	180701020106	Im		E	
Agua Dulce Canyon Creek (Santa Clara River R8 to Esccondido Canyon Rd.)	180701020104	I		E	
Agua Dulce Canyon Creek (above Esccondido Canyon Rd.)	180701020104	I		E	
Agua Dulce Canyon Creek	180701020103	E		E	
Lake Hughes	180701020901	E		E	
Munz Lake	180701020801	E		E	
Lake Elizabeth	180701020301	E		E	

Footnotes are consistent for all beneficial use tables.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

k. Public access to reservoir and its surrounding watershed is prohibited by Los Angeles County Department of Public Works.

l. The majority of the reach is intermittent, there is a small area of rising ground water creating perennial flow.

m. Access prohibited by Los Angeles Department in the concrete-channelized areas.

j. Out of service.

E: Existing beneficial use

P: Potential beneficial use

I: Intermittent beneficial use

E, P, and I: shall be protected as required

\* Asterisked MDN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details).

Los Angeles Regional Water Quality Control Board

Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>3</sup>	WBD No.	REC1	REC2	REC3	High Flow Suspension
<b>CALLEGUAS-CONEJO CREEK WATERSHED</b>					
Calleguas Creek Estuary*	180701030107	Pn			E
Calleguas Creek Reach 1 Migu Lagoon	180701030102	Pn			E
Calleguas Creek Reach 2 Calleguas Creek (Estuary to Potrero Rd.)	180701030107	E			E
Calleguas Creek Reach 3 Calleguas Creek (Potrero Rd. to Conejo Creek)	180701030107	Eq			E
Calleguas Creek Reach 4 Revolon Slough (Calleguas Creek Rch 2 to Pleasant Valley Rd.)	180701030107	Eq			E
Calleguas Creek Reach 5 Revolon Slough (Pleasant Valley Rd. to Central Ave.)	180701030106	Eq			E
Calleguas Creek Reach 6 Beardsley Channel (above Central Ave.)	180701030106	E			E
Calleguas Creek Reach 8 Arroyo Las Posas (Calleguas Creek Rch 3 to Long Canyon)	180701030103	E			E
Calleguas Creek Reach 7 Arroyo Las Posas (Long Canyon to Hitch Rd.)	180701030103	E			E
Calleguas Creek Reach 9 Arroyo Simi (Hitch Rd. to Happy Camp Canyon)	180701030103	I			I
Calleguas Creek Reach 10 Arroyo Simi (Happy Camp Canyon to Alamos Canyon)	180701030102	I			I
Calleguas Creek Reach 11 Arroyo Simi (Alamos Canyon to Tapo Canyon Creek)	180701030102	I			I
Calleguas Creek Reach 12 Arroyo Simi (above Tapo Canyon Creek)	180701030101	I			I
Calleguas Creek Reach 13 Tapo Canyon Creek (above Arroyo Simi)	180701030101	I			I
Calleguas Creek Reach 9A Conejo Creek (Caminosa Diversion to Camanillo Rd.)	180701030105	Eq			E
Calleguas Creek Reach 9B Conejo Creek (Camanillo Rd. to Arroyo Santa Rosa)	180701030105	I			I
Calleguas Creek Reach 10 Conejo Creek (Calleguas Creek Rch 3 to Caminosa Diversion)	180701030105	Eq			E
Calleguas Creek Reach 11 Arroyo Conejo (Conejo Creeks North Fork Arroyo Conejo)	180701030105	I			I
Calleguas Creek Reach 12 Arroyo Santa Rosa (above conit. with Conejo Creek)	180701030105	I			I
Calleguas Creek Reach 13 North Fork Arroyo Conejo (above conit. with Arroyo Conejo)	180701030104	E			E
Calleguas Creek Reach 14 Arroyo Conejo (above conit. with North Fork Arroyo Conejo)	180701030104	I			I
Calleguas Creek Reach 15 Gillbrand Canyon Creek (Tapo Canyon Creek to Windmill Canyon)	180701030101	I			I
Calleguas Creek Reach 16 Gillbrand Canyon Creek (above Windmill Canyon)	180701030101	I			I
Calleguas Creek Reach 17 Lake Bard (Wood Ranch Reservoir)	180701030102	Pr			Er

Footnotes are consistent for all beneficial use tables.

- a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- c. Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands table (2-4)
- n. Area is currently under control of the Navy; swimming is prohibited.
- q. Wherever flow conditions are suitable.
- r. Public access prohibited by Calleguas MWD.

Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>a</sup>	WBD No.	REC1	REC-1	REC2	High Flow Suspension
<b>LOS ANGELES COUNTY COASTAL STREAMS</b>					
Ameyo Slough	180701040202	E			
San Nicholas Canyon Creek	180701040202	I			
Los Miras Canyon Creek	180701040202	I			
Lachusa Canyon Creek	180701040202	I			
Erincipal Canyon Creek	180701040202	I			
Trancas Canyon Creek	180701040203	Em			
Dume Lagoon	180701040203	E			
Dume Creek (Zuma Canyon)	180701040203	E			
Ramirez Canyon Creek	180701040204	I			
Escomido Canyon Creek	180701040204	I			
Ladigo Canyon Creek	180701040204	I			
Solstice Canyon Creek	180701040204	E			
Puerto Canyon Creek	180701040204	I			
Corral Canyon Creek	180701040204	I			
Carbon Canyon Creek	180701040403	I			
Las Flores Canyon Creek	180701040403	I			
Piedra Gorda Canyon Creek	180701040403	I			
Pena Canyon Creek	180701040403	I			
Tuna Canyon Creek	180701040403	I			
Tropanga Lagoon <sup>c</sup>	180701040404	E			
Topanga Canyon Creek	180701040404	I			
Santa Ynez Canyon	180701040403	I			
Santa Ynez Lake (Lake Shrine)	180701040403	Pk			
Santa Monica Canyon Channel	180701040402	Ps			
Rustic Canyon Creek	180701040402	I			
Sullivan Canyon Creek	180701040402	I			
Mendocino Canyon Creek	180701040500	I			
Coastal Streams of Palos Verdes Canyon	180701040701	I			
Coastal Streams of Palos Verdes	180701040701	E			
Baby Slough	180701040701	P			
Marchado Lake	180701040300	Pk			
Madona Marsh	180701040300	Pk			
Stone Canyon Reservoir	180701040300	Pk			
Hollywood Reservoir	180701040300	Pk			
Franklin Canyon Reservoir	180701040300	Pk			
Upper Franklin Canyon Reservoir	180701040300	P			

Footnotes are consistent for all beneficial use tables.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

c: Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands table (2-4).

k: Public access to reservoir and its surrounding watershed is prohibited by Los Angeles County Department of Public Works.

m: Access prohibited by Los Angeles County Department in the concrete-channelized areas.

s: Access prohibited by Los Angeles County Department of Public Works.

t: This reservoir is covered and thus inaccessible.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Intermittent beneficial use  
 E, P, and I: shall be protected as required.  
 \* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details)

Los Angeles Regional Water Quality Control Board

Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>a</sup>	WBD No.	REC1	REC2	High Flow Suspension
<b>MALIBU CREEK WATERSHED</b>				
Malibu Lagoon <sup>b</sup>	180701040104	E		
Malibu Creek	180701040104	E		
Cold Creek	180701040104	E		
Las Virgenes Creek	180701040103	Em		
Century Reservoir	180701040104	E		
Malibu Lake	180701040104	Em		
Medea Creek Reach 1 (Malibu Lake to Lindero Creek Reach 1)	180701040102	Em		
Medea Creek Reach 2 (above Lindero Creek Reach 1)	180701040102	Em		
Lindero Creek Reach 1 (Medea Creek Reach 1 to Lake Lindero)	180701040102	I		
Lindero Creek Reach 2 (above Lake Lindero)	180701040102	I		
Trilunfo Creek Reach 1 (Malibu Lake to Loba Canyon)	180701040101	Im		
Trilunfo Creek Reach 2 (Loba Canyon to Westlake Lake)	180701040104	Im		
Westlake Lake	180701040101	E		
Pottro Valley Creek	180701040101	E		
Lake Eleanor Creek	180701040101	I		
Lake Eleanor	180701040101	I		
Las Virgenes (Westlake) Reservoir	180701040101	PKV		
Harden Valley Creek	180701040101	I		
Lake Sherwood	180701040101	E		
<b>BALONA CREEK WATERSHED</b>				
Balona Creek Estuary (ends at Cerritos Creek) <sup>c, **</sup>	180701040200	E		
Balona Lagoon/Venice Canals <sup>c</sup>	180701040203	E		
Balona Wetlands <sup>c</sup>	180701040300	E		
Del Rey Lagoon <sup>c</sup>	180701040500	Es au		
Balona Creek Reach 2 (Estuary to National Blvd.)	180701040300	Ps au		Yav
Balona Creek Reach 1 (above National Blvd.)	180701040300	Ps au		Yav
<b>LOS CERRITOS CHANNEL WATERSHED</b>				
Los Cerritos Wetlands <sup>c</sup>	180701040702	E		
Los Cerritos Channel Estuary (Ends at Anaheim Rd.) <sup>c</sup>	180701040702	Es		
Sims Point	180701040702	P		
Los Cerritos Channel	180701040702	P		
Colorado Lagoon <sup>c</sup>	180701040702	E		

E: Existing beneficial use

P: Potential beneficial use

I: Intermittent beneficial use

E, P, and I: shall be protected as required.

\* Asterisked MIN designations are designated under SB 38-63 and RB 89-03. Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details).

au: The REC-1 use designation does not apply to recreational activities associated with the swimmable goal as expressed in the Federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use in the Basin Plan, or the associated bacteriological objectives set to protect those activities. However, water quality objectives set to protect other REC-1 uses associated with the fishable goal as expressed in the Federal Clean Water Act section 101(a)(2) shall remain in effect for waters where the (au) footnote appears.

av: The High Flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect (f) other recreational uses associated with the fishable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.

\*\* The dividing line between "Balona Creek" and "Balona Creek to Estuary" is the point at which the vertical channel walls transition to sloping walls.

Footnotes are consistent for all beneficial use tables.  
 a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

c: Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands table (2-4)

k: Public access to reservoir and its surrounding watershed is prohibited by Los Angeles County Department of Public Works.

m: Access prohibited by Los Angeles County Department of Public Works in the concrete-channelized areas.

s: Access prohibited by Los Angeles County Department of Public Works.

v: Public water supply reservoir. Owner prohibits public entry.

w: These areas are engineered channels. All references in Regional Board documents are functionally equivalent to estuaries.



Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>2</sup>	WSD No.	REC1	REC2	REC3	REC4	REC5	High Flow Suspension
LOS ANGELES RIVER WATERSHED (cont.)							
Duesnane Canyon Creek	180701050207	I					
Shubank Wash (above)	180701050208	I					Yav
La Tuza Canyon Lateral and Creek	180701050209	I					
Tujunga Wash	180701050210	I					Yav
Hansen Flood Control Basin & Lakes	180701050211	I					
Lopez Canyon Creek	180701050212	I					
Little Tujunga Canyon Creek	180701050213	I					
Kapel Canyon Creek	180701050214	I					
Big Tujunga Canyon Creek (Hansen Flood Control Basin to Big Tujunga Reservoir)	180701050215	E					
Big Tujunga Canyon Creek (above Big Tujunga Reservoir)	180701050216	E					
Upper Big Tujunga Canyon Creek	180701050217	E					
Palmer Canyon Creek	180701050218	I					Yav
Vasquez Creek	180701050219	E					
Clear Creek	180701050220	E					
Big Tujunga Reservoir	180701050221	E					
MB Creek	180701050222	E					
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	180701050223	E					Yav
Pacoima Wash	180701050224	E					
Pacoima Reservoir	180701050225	E					
Pacoima Canyon Creek	180701050226	E					
May Canyon Creek	180701050227	E					
Wilson Canyon Creek	180701050228	E					
Stetson Canyon Creek	180701050229	E					Yav
Los Angeles River Reach 5 (Sepulveda Dam to Balboa Blvd.)	180701050230	E					Yav
Sepulveda Flood Control Basin	180701050231	E					
Bluff Creek	180701050232	I					
Los Angeles Reservoir	180701050233	E					
Lower Van Norman Reservoir	180701050234	E					
Upper Van Norman Reservoir	180701050235	E					
Cabelero Creek	180701050236	E					Yav
Aliso Canyon Wash (Los Angeles River Reach 6 to State Hwy 118)	180701050237	I					Yav
Aliso Canyon Creek (above State Hwy 118)	180701050238	I					Yav
Limekiln Canyon Wash	180701050239	I					Yav
Browns Canyon Wash (Los Angeles River Reach 6 to State Hwy 118)	180701050240	I					
Browns Canyon Creek (above State Hwy 118)	180701050241	I					Yav
Aroyo Calabasas	180701050242	I					
Elly Canyon Creek	180701050243	I					
McCoy Canyon Creek	180701050244	I					Yav
Reiff Creek	180701050245	I					
Chatsworth Reservoir <sup>3</sup>	180701050246	P					
Chatsworth Canyon Creek	180701050247	I					

E: Existing beneficial use

P: Potential beneficial use

I: Intermittent beneficial use

E, P, and I: shall be protected as required.

\* Asterisked MUN designations are designated under SB 88-63 and RB 89-03.

Some designations may be considered for exemption at a later date (See pages 2-3, 4 for more details).

av. The High Flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. Water quality objectives set to protect (1) other recreational uses associated with the fishable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.

Footnote are consistent for all beneficial use tables.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

k. Public access to reservoir and its surrounding watershed is prohibited by Los Angeles County Department of Public Works.

m. Access prohibited by Los Angeles County Department in the Concrete-channelized areas.

n. This reservoir is covered and thus inaccessible.

y. Currently dry and no plans for restoration.

Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>1</sup>	WBD No.	REC1	REC-1	REC2	High Flow Suspension
<b>LOS ANGELES RIVER WATERSHED (cont.)</b>					
<b>ISOLATED LAKES AND RESERVOIRS:</b>					
Eagle Rock Reservoir	180701050402				
Echo Lake	180701050200				
El Dorado Lake	180701050506				
Elgin Reservoir	180701050403				
Enclave Reservoir	180701050208				
Manitou Reservoir	180701040200				
Lincoln Park Lake Silver Reservoir	180701050403				
Silver Lake Reservoir	180701050208				
Toluca Lake	180701050208				
<b>SAN GABRIEL RIVER WATERSHED</b>					
San Gabriel River Estuary (Ends at Wilbow St.)	180701050506				
Coyote Creek (San Gabriel River Estuary to La Canada Verde Creek)	180701050506				
Coyote Creek (above La Canada Verde Creek)	180701050506				
San Gabriel River Reach 1 (San Gabriel River Estuary to Firestone Blvd.)	180701050506				
San Gabriel River Reach 2 (Firestone Blvd. to Whittier Narrows Dam)	180701050506				
Whittier Narrows Flood Control Basin	180701050303				
Legg Lake	180701050303				
San Gabriel River Reach 3 (Whittier Narrows Dam to San Jose Creek)	180701050501				
San Gabriel River Reach 3 (San Jose Creek to Ramona Blvd.)	180701050501				
San Jose Creek Reach 1 (San Gabriel River Reach 3 to Temple Ave.)	180701050502				
San Jose Creek Reach 2 (Temple Ave. to Thompson Wash)	180701050501				
Puente Creek	180701050501				
Thompson Wash (San Jose Creek Reach 2 to Web Canyon)	180701050501				
Thompson Creek (above Web Canyon)	180701050501				
Thompson Creek Reservoir	180701050501				
Wasatch Creek Wash	180701050402				
Big Dalton Wash	180701050402				
Big Dalton Canyon Creek	180701050402				
Myrtle Canyon	180701050402				
Big Dalton Reservoir	180701050402				
Ball Canyon Creek	180701050402				
Little Dalton Wash	180701050402				
Elkins Dash Canyon Creek	180701050402				
San Dimas Wash (lower) (Big Dalton Wash to Han Canyon)	180701050402				
San Dimas Wash (upper) (above Han Canyon)	180701050401				
San Dimas Reservoir	180701050401				
San Dimas Canyon Creek	180701050401				
West Fork San Dimas Canyon	180701050401				
Waltzell Canyon	180701050402				
Puddingstone Reservoir	180701050402				
Live Oak Creek	180701050402				
Live Oak Reservoir	180701050402				
Puddingstone Wash	180701050402				
Marshall Creek and Wash (Puddingstone Reservoir to Web Canyon)	180701050402				

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Intermittent beneficial use  
 E, P, and I: shall be protected as required.  
 av: The High Flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the Federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. Water quality objectives set to protect (1) other recreational uses associated with the fishable goal as expressed in the Federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.  
 Footnotes are consistent for all beneficial use tables.  
 m: Access prohibited by Los Angeles County Department in the Concrete-channelized areas.  
 n: This reservoir is covered and thus inaccessible.  
 x: Owner prohibits entry.  
 w: These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.  
 k: Public access to reservoir and its surrounding watershed is prohibited by Los Angeles County Department of Public Works.

Los Angeles Regional Water Quality Control Board

Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>3</sup>	WBD No.	REC1	REC-1	REC2	High Flow Suspension
<b>SAN GABRIEL RIVER WATERSHED (cont.)</b>					
Marshall Creek and Wash (above Via Arroyo)	180701060402		kn		
Edwards Creek And Wash	180701060402		kn		Yav
San Gabriel River Reach 4 (Ramona Blvd. to Santa Fe Dam)	180701060501		kn		Yav
Santa Fe Flood Control Basin	180701060501		P		
<b>DEPER-SAN GABRIEL RIVER TRIBUTARIES</b>					
San Gabriel River Reach 5 (Santa Fe Dam to Huntington Dr.)	180701060501		kn		Yav
San Gabriel River Reach 5 (Huntington Dr. to Van Tassel Canyon)	180701060501		E		
San Gabriel River Reach 5 (Van Tassel Canyon to San Gabriel Reservoir)	180701060501		E		
Beauby Canyon Creek	180701060501		I		
Sprinkles Canyon Creek	180701060501		I		
Madlock Canyon Creek	180701060501		I		
Van Tassel Canyon	180701060501		I		
Fish Canyon Creek	180701060501		E		
Roberts Canyon Creek	180701060501		E		
Morris Reservoir	180701060501		P		
San Gabriel Reservoir	180701060501		E		
East Fork San Gabriel River (San Gabriel Reservoir to Fish Fork)	180701060501		E		
East Fork San Gabriel River (above Fish Fork)	180701060501		E		
Cable Canyon Creek	180701060502		E		
Coldwater Canyon Creek	180701060502		E		
Cow Canyon Creek	180701060503		E		
Alison Gulch	180701060501		E		
Fish Fork	180701060501		E		
West Fork San Gabriel River (San Gabriel Reservoir to Bear Creek)	180701060502		E		
West Fork San Gabriel River (above Bear Creek)	180701060502		E		
North Fork San Gabriel River	180701060502		E		
Richita Canyon	180701060504		E		
Coldbrook Creek	180701060504		E		
Soldier Creek	180701060504		I		
Cedar Creek	180701060504		I		
Crystal Lake	180701060504		E		
Bear/Gatek	180701060504		E		
Cogswell Reservoir	180701060505		E		
Devils Canyon Creek	180701060502		E		
<b>ISLAND WATERCOURSES</b>					
Anacapa Island	180600140203		P		
San Nicolas Island	180701070001		P		
Santa Barbara Island	180701070003		E		
Santa Catalina Island	180701070002		E		
Melita Ranch System	180701070003		E		
San Clemente Island	180701070004		E		
<b>SAN ANTONIO CREEK WATERSHED<sup>3</sup></b>					
San Antonio Dam And Reservoir			E		
San Antonio Canyon Creek			E		

Footnotes are consistent for all beneficial use tables.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

m. Access prohibited by Los Angeles County Department in the Concrete-channelized areas.

ab. This watershed is also in Region 8 (801.23).

av. The High Flow Suspension only applies to water contact recreational activities associated with the swimmable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use, non-contact water recreation involving incidental water contact regulated under the REC-2 use, and the associated bacteriological objectives set to protect those activities. Water quality objectives set to protect (1) other recreational uses associated with the fishable goal as expressed in the federal Clean Water Act section 101(a)(2) and regulated under the REC-1 use and (2) other REC-2 uses (e.g., uses involving the aesthetic aspects of water) shall remain in effect at all times for waters where the (av) footnote appears.

E. Existing beneficial use  
 P. Potential beneficial use  
 I. Intermittent beneficial use  
 E, P, and I: shall be protected as required.

Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED*	WSD No.	REC1	REC2	REC3	High Flow Suspension
<b>VENTURA COUNTY COASTAL FEATURE*</b>					
Nearshore <sup>a</sup>					
Offshore Zone					
Rincon Beach	180701010201	E	E	E	
Ventura River Estuary <sup>c</sup>	180701010206	E	E	E	
Ventura Keys (Marina)	180701010202	E	E	E	
Ventura Marina	180701010904	E	E	E	
Santa Clara River Estuary <sup>c</sup>	180701010201	E	E	E	
Mandeville Beach	180701010201	Ed	Ed	Ed	
McGrath Lake <sup>c</sup>	180701010201	E	E	E	
Edison Canal Estuary	180701010201	E	E	E	
Channel Islands Harbor	180701010201	E	E	E	
Mandeville Bay (Marina)	180701010201	E	E	E	
Port Huemene (Harbor)	180701010201	E	E	E	
Ormond Beach	180701010201	E	E	E	
Ormond Beach Wetlands <sup>c</sup>	180701010202	Pn	Pn	Pn	
Mixon Lagoon <sup>c</sup>	180701010202	Pn	Pn	Pn	
Calleguas Creek Estuary <sup>c</sup>	180701010202	Pn	Pn	Pn	
<b>LOS ANGELES COUNTY COASTAL FEATURE*</b>					
Nearshore Zone <sup>a</sup>					
Offshore Zone <sup>a</sup>					
Nicholas Canyon Beach	180701040402	E	E	E	
Francis Beach	180701040403	E	E	E	
Zuma County (Westward) Beach	180701040403	E	E	E	
Dume State Beach	180701040404	E	E	E	
Dume Lagoon <sup>c</sup>	180701040403	E	E	E	
Escalante Beach	180701040404	E	E	E	
Dean Stocker Memorial (Central) Beach	180701040404	E	E	E	

Footnotes are consistent for all beneficial use tables.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Intermittent beneficial use  
 E.P. and I. shall be protected as required.  
<sup>a</sup>: Nearshore is defined as the zone bounded by the shoreline and a line 1000 feet from the shoreline or the 30-foot depth contours, whichever is further from the shore line. Longshore extent is from Rincon Creek to the San Gabriel River estuary.

a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.  
 b. Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.  
 c. Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).  
 d. Limited public access precludes full utilization.  
 e. One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.  
 f. Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.  
 n. Area is currently under control of the Navy; swimming is prohibited.  
 o. Marine Habitats of the Channel Islands and Mugu Lagoon serve as pinned haul-out areas for one or more species (i.e., sea lions).  
 p. Habitat of the Clapper Rail.  
 an. Areas of Special Biological Significance (along coast from Fatigo Point to Laguna Point) and Big Sycamore Canyon and Abalone Cove Ecological Reserves and Point Fermin Marine Life Refuge.  
 ar. Areas exhibiting large shellfish populations include Malibu, Point Dume, Point Fermin, White Point and Zuma Beach.  
 ap. Water contact recreational activities are limited to the beach area at the harbor by Marina Authorities.  
 aq. Water contact recreational activities are limited by City of Oxnard to within the easement area of each home.

Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED	WBD No.	REC 1	REC 2	REC 3	High Flow Suspension
<b>LOS ANGELES COUNTY COASTAL FEATURE (CONT.)</b>					
Puerto Beach	180701040404	E	E		
Amanito Beach	180701040404	E	E		
Malibu Beach	180701040404	E	E		
Malibu Lagoon c	180701040502	E	E		
Carbon Beach	180701040502	E	E		
La Costa Beach	180701040502	E	E		
Las Flores Beach	180701040502	E	E		
Las Tijeras Beach	180701040502	E	E		
Topanga Beach	180701040502	E	E		
Topanga Lagoon c	180701040502	E	E		
Will Rogers State Beach	180701040502	E	E		
Santa Monica Beach	180701040502	E	E		
Venice Beach	180701040502	E	E		
Manana Del Rey Harbor	180701040502	E	E		
Public Beach Areas	180701040502	E	E		
All other Areas	180701040502	P	E		
Entrance Channel	180701040502	E	E		
Ballona Creek Estuary c, w	180701040200	E	E		
Ballona Lagoon/Venice Canals c	180701040502	E	E		
Ballona Wetlands c	180701040200	E	E		
Del Rey Lagoon c	180701040501	E	E		
Dockweiler Beach	180701040501	E	E		
Marlinton Beach	180701040501	E	E		
Hermosa Beach	180701040501	E	E		
King Harbor	180701040501	E	E		
Redondo Beach	180701040501	E	E		
Torrance Beach	180701040501	E	E		
Port Vicente Beach	180701040501	E	E		
Royal Palms Beach	180701040501	E	E		

Footnotes are consistent for all beneficial use tables.

- a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
- c: Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).
- e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- ar: Areas exhibiting large shellfish populations include Malibu, Point Dume, Point Fermin, White Point and Zuma Beach.
- as: Most frequently used grunion spawning beaches. Other beaches may be used as well.
- vr: These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.

Los Angeles Regional Water Quality Control Board  
 Schedule of Inland Surface Waters (Continued)

WATERSHED*	WBD No.	REC1	REC2	REC3	REC4	REC5	High Flow Suspension
LOS ANGELES COUNTY COASTAL AREAS	180701040601	E					
Whites Point County Beach	180701040602	E					
Cabrillo Beach	180701040602	E					
Los Angeles - Long Beach Marina	180701040602	E					
Outer Harbor	180701040602	E					
Marinas	180701040602	P					
Public Beach Areas	180701040602	E					
All Other Inner Areas	180701040604	E					
Domiguez Channel	180701040600	E					
Los Angeles River, Est	180701040600	E					
Alamitos Bay	180701040600	E					
Los Cerritos Wetlands	180701040606	E					
Los Cerritos Channel	180701040600	E					
San Gabriel Estuary	180701040600	P					
Long Beach Marina	180701040600	E					
Public Beach	180701040600	P					
All other Areas	180701040600	E					
Maine Stadium	180600100203	E					
Long Beach	180701070001	E					
ISLANDS NEAR SHORE ZONE	180701070001	E					
Anacapa Island	180701070003	E					
San Nicolas Island	180701070003	E					
Begg Rock	180701070003	E					
Santa Barbara Island	180701070003	E					
Santa Catalina Island	180701070002	E					
Santa Catalina Island	180701070004	E					
San Clemente Island							

Footnotes are consistent for all beneficial use tables.

- a: Watersheds are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
- c: Coastal waterbodies which are also listed in Coastal Features Table (2-3) or in Wetlands Table (2-4).
- e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- n: Area is currently under control of the Navy; swimming is prohibited.
- p: Habitat of the Clapper Rail.
- an: Areas of Special Biological Significance (along coast from Latigo Point to Laguna Point) and Big Sycamore Canyon and Abalone Cove Ecological Reserves and Point Fermin Marine Life Refuge.
- ar: Areas exhibiting large shellfish populations include Malibu, Point Duran, Point Fermin, White Point and Zuma Beach.
- ap: Water contact recreational activities are limited to the beach area at the harbor by Marina Authorities.

Table 2-1a. Beneficial

Use

Designations

for

Waterbodies

in

Los Angeles

County

Watersheds

(Continued)

E: Existing beneficial use

P: Potential beneficial use

I: Interim beneficial use

E, P, and I: shall be protected

\* Asterisked MUN designations may be considered more details.

N: Nearshore is defined as the shoreline or the 30-foot d

Los Angeles Regional Water Quality Control Board  
 Table 2-1a. Beneficial Uses of Inland Surface Waters (Continued).

WATERSHED <sup>a</sup>	WBD No.	REC1	REC2	REC3	High Flow Suspension
<b>WETLAND<sup>b</sup></b>	<b>WBD No.</b>				
Ventura River Estuary c	180701010105	E	E		
Santa Clara River Estuary c	180701020804	E	E		
McGrath Lake c	180701030201	Ed	Ed		
Oxnard Beach Wetlands c	180701030202	E	E		
Magu Lagoon c	180701030202	Ph	E		
Dume Lagoon c	180701040403	E	E		
Malibu Lagoon c	180701040704	E	E		
Topanga Lagoon c	180701040501	E	E		
Balboa Lagoon/Venice Canals c	180701040502	E	E		
Balboa Wetlands c	180701040200	E	E		
Del Rey Lagoon c	180701040601	E	E		
Los Cerritos Wetlands c	180701060600	E	E		

<sup>a</sup> This list may not be all inclusive. More areas may be added as information becomes available.

E: Existing beneficial use

P: Potential beneficial use

Ed: Intermittent beneficial use

E, P, and F: shall be protected as required.

Footnotes are consistent for all beneficial use tables.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

c: Coastal waterbodies which are also listed in Inland Surface Waters Table (2-1) or in Wetlands Table (2-4).

d: Limited public access precludes full utilization.

n: Area is currently under control of the Navy; swimming is prohibited.

Los Angeles Regional Water Quality Control Board

Table 2-2 Beneficial Uses of Ground Waters.<sup>2c</sup>

DWR# Basin No.	BASIN AREA	MUN	IND	PROC	AGR	ACQUA
4-1	PITAS POINT AREA	E	E	P	E	E
4-1	UPPER OJAI VALLEY	E	E	E	E	E
4-2	LOWER OJAI VALLEY	E	E	E	E	E
4-3	VENTURA RIVER VALLEY	E	E	E	E	E
4-3.01	Upper Ventura	E	E	E	E	E
4-3.02	Lower Ventura	P	E	P	E	E
4-4	SANTA CLARA RIVER VALLEY					
4-1.02	Oxnard	E	E	E	E	E
4-1.02	Oxnard Forebay	E	E	E	E	E
4-1.02	Confined aquifers	E	E	E	E	E
4-1.02	Unconfined and perched aquifers	E	E	E	E	E
4-1.03	Mound	E	E	E	E	E
4-1.03	Confined aquifers	E	E	E	E	E
4-1.03	Unconfined and perched aquifers	E	E	E	E	E
4-1.04	Santa Paula	E	E	E	E	E
4-1.04	East of Peck Road	E	E	E	E	E
4-1.04	West of Peck Road	E	E	E	E	E
4-1.05	Fillmore	E	E	E	E	E
4-1.05	Pole Creek Fan area	E	E	E	E	E
4-1.05	South side of Santa Clara River	E	E	E	E	E
4-1.05	Remaining Fillmore area	E	E	E	E	E
4-1.05	Topa Topa (upper Suspe) area	E	E	E	E	E
4-1.05	Plant	E	E	E	E	E
4-1.06	Upper area (above Lake Piru)	E	E	E	E	E
4-1.06	Lower area east of Piru Creek	E	E	E	E	E
4-1.06	Lower area west of Piru Creek	E	E	E	E	E
4-1.07	Santa Clara River Valley East	E	E	E	E	E
4-1.07	Mint Canyon	E	E	E	E	E
4-1.07	South Fork	E	E	E	E	E
4-1.07	Flacanita Canyon	E	E	E	E	E
4-1.07	Bocquet and San Francisco Canyons	E	E	E	E	E
4-1.07	Castaic Valley	E	E	E	E	E
4-1.07	Saugus Aquifer	E	E	E	E	E
4-5	ACTON VALLEY					
4-5	Acton Valley	E	E	E	E	E
4-5	Sierra Pelona Valley (Agua Dulce)	E	E	E	E	E
4-5	Upper Mint Canyon	E	E	E	E	E
4-5	Upper Bouquet Canyon	E	E	E	E	E
4-5	Green Valley	E	E	E	E	E
4-5	Lake Elizabeth - Lake Hughes area	E	E	E	E	E
4-5	PLEASANT VALLEY					
4-5	Confined aquifers	E	E	E	E	E
4-5	Unconfined and perched aquifers	P	E	E	E	E

E: Existing beneficial use

P: Potential beneficial use

See pages 2-1 to 2-3 for description of beneficial use

2c: Basins are numbered according to DWR Bulletin No. 118-Update 2003 (DWR, 2003).

2d: Ground waters in the Pitas Point area (between the lower Ventura River and Rincon Point) are not considered to comprise a major basin and, accordingly, have not been designated a basin number by the DWR or outlined on Fig. 1-9.

2e: Santa Clara River Valley Basin was formerly Ventura Central Basin and Acton Valley Basin was formerly Upper Santa Clara Basin (DWR, 1980).

2f: Pleasant Valley, Arroyo Santa Rosa Valley, and Las Posas Valley Basins were formerly subbasins of Ventura Central (DWR, 1980).

2g: Nitrate pollution in the groundwater of the Sanland-Tujunga area currently precludes direct MUN uses. Since the ground water in this area can be reused or bled off for both, it retains the MUN designation.

2h: Raymond Basin was formerly a subbasin of San Gabriel Valley and is now a separate basin. The Main San Gabriel Basin was formerly separated into Eastern and Western areas. Since these areas had the same beneficial uses as Puente Basin all three areas have been combined into San Gabriel Valley. Any ground water upgradient of these areas is subject to downgradient beneficial uses and objectives, as explained in Footnote 2c.

2i: These areas were formerly part of the Russell Valley Basin (DWR, 1980).

2j: Groundwater in the Conejo-Tierra Rejada Volcanic Area occurs primarily in fractured volcanic rocks in the western Santa Monica Mountains and Conejo Mountain areas. These areas have not been delineated on Fig. 1-9.

2k: With the exception of ground water in Malibu Valley (DWR Basin No. 4-22) ground waters along the southern slopes of the Santa Monica Mountains are not considered to comprise a major basin and accordingly have not been designated a basin number by DWR.

2l: DWR has not designated basins for groundwater on the San Pedro Channel Islands.

2m: Beneficial uses for ground waters outside of the major basins are, in many cases, significant sources of water. Furthermore, ground waters outside of the major basins are either potential or existing sources of water for downgradient basins, and as such, beneficial uses in the downgradient basins shall apply to these areas.

DWR# Basin No.	BASIN	MUN	IND	PROC	AGR	ACQUA
4-7	ARROYO SANTA ROSA VALLEY	E	E	E	E	E
4-8	LAS POSAS VALLEY	E	E	E	E	E
4-9	SIMI VALLEY	E	E	E	E	E
	Simi Valley Basin	E	E	E	E	E
	Confined aquifers	E	E	E	E	E
	Unconfined aquifers	E	E	E	E	E
	Gilbert Road Basin	E	E	E	E	E
4-10	CONEJO VALLEY	E	E	E	E	E
4-11	COASTAL PLAIN OF LOS ANGELES	E	E	E	E	E
4-11.01	Santa Monica	E	E	E	E	E
4-11.02	Hollywood	E	E	E	E	E
4-11.03	West Coast	E	E	E	E	E
4-11.03	Underlying Ports of Los Angeles & Long Beach	E	E	E	E	E
4-11.03	Underlying El Segundo, Seaward of Blanter	E	E	E	E	E
4-11.03	Remainder of Basin	E	E	E	E	E
4-11.04	Central	E	E	E	E	E
4-12	SAN FERNANDO VALLEY	E	E	E	E	E
4-13	SAN GABRIEL VALLEY	E	E	E	E	E
4-15	TIERRA REJADA	E	E	E	E	E
4-16	HIDDEN VALLEY	E	E	E	E	E
4-17	LOKWOOD VALLEY	E	E	E	E	E
4-18	HUNGRY VALLEY	E	E	E	E	E
4-19	THOUSAND OAKS AREA	E	E	E	E	E
4-19	Trunfo Canyon area	P	P	P	E	E
4-19	Ladero Canyon area	P	P	P	E	E
4-19	Las Virgenes Canyon area	P	P	P	E	E
4-20	RUSSELL VALLEY	E	E	E	E	E
4-21	CONCHO-TIERRA REJADA VOLCANIC	E	E	E	E	E
4-22	MALIBU VALLEY	E	E	E	E	E
4-22	Camanillo area	E	E	E	E	E
4-22	Point Dume area	E	E	E	E	E
4-22	Malibu Valley	E	E	E	E	E
4-22	Topanga Canyon area	P	P	P	E	E
4-23	SAN PEDRO CHANNEL ISLANDS	E	E	E	E	E
	Anacapa Island	P	P	P	E	E
	San Nicolas Island	E	E	E	E	E
	Santa Catalina Island	E	E	E	E	E
	San Clemente Island	P	P	P	E	E
	Santa Barbara Island	P	P	P	E	E

Footnotes are consistent for all beneficial use tables

2c: Beneficial uses for ground waters outside of the major basins are, in many cases, significant sources of water. Furthermore, ground waters outside of the major basins are either potential or existing sources of water for downgradient basins, and as such, beneficial uses in the downgradient basins shall apply to these areas.

2d: Basins are numbered according to DWR Bulletin No. 118-Update 2003 (DWR, 2003).

2e: Ground waters in the Pitas Point area (between the lower Ventura River and Rincon Point) are not considered to comprise a major basin and, accordingly, have not been designated a basin number by the DWR or outlined on Fig. 1-9.

2f: Santa Clara River Valley Basin was formerly Ventura Central Basin and Acton Valley Basin was formerly Upper Santa Clara Basin (DWR, 1980).

2g: Pleasant Valley, Arroyo Santa Rosa Valley, and Las Posas Valley Basins were formerly subbasins of Ventura Central (DWR, 1980).

2h: Nitrate pollution in the groundwater of the Sanland-Tujunga area currently precludes direct MUN uses. Since the ground water in this area can be reused or bled off for both, it retains the MUN designation.

2i: Raymond Basin was formerly a subbasin of San Gabriel Valley and is now a separate basin. The Main San Gabriel Basin was formerly separated into Eastern and Western areas. Since these areas had the same beneficial uses as Puente Basin all three areas have been combined into San Gabriel Valley. Any ground water upgradient of these areas is subject to downgradient beneficial uses and objectives, as explained in Footnote 2c.

2j: These areas were formerly part of the Russell Valley Basin (DWR, 1980).

2k: Groundwater in the Conejo-Tierra Rejada Volcanic Area occurs primarily in fractured volcanic rocks in the western Santa Monica Mountains and Conejo Mountain areas. These areas have not been delineated on Fig. 1-9.

2l: With the exception of ground water in Malibu Valley (DWR Basin No. 4-22) ground waters along the southern slopes of the Santa Monica Mountains are not considered to comprise a major basin and accordingly have not been designated a basin number by DWR.

2m: DWR has not designated basins for groundwater on the San Pedro Channel Islands.

2n: Beneficial uses for ground waters outside of the major basins are, in many cases, significant sources of water. Furthermore, ground waters outside of the major basins are either potential or existing sources of water for downgradient basins, and as such, beneficial uses in the downgradient basins shall apply to these areas.

Los Angeles Regional Water Quality Control Board

COASTAL FEATURE*	WBD No.	MUN	IND	PROC	NAV	POWCOMM	WARM	COLD	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WETB
<b>VENTURA COUNTY COASTAL</b>																	
Nearshore <sup>a</sup>																	
Offshore Zone			E														
Rincon Beach	180701010201				E							Ean	Ee	Ef	Ef	E	
Ventura River Estuary c	180701010106				E								Ee	Ef	Ef	E	
Ventura Keys (Maine)	180701010202				E								Ee	Ef	Ef	E	
Ventura Marina	180701010904				E								Ee	Ef	Ef	E	
Santa Clara River Estuary c	180701010904				E								Ee	Ef	Ef	E	
Mandakay Beach	180701010201				E								Ee	Ef	Ef	E	
McGrath Lake c	180701010201				E								Ee	Ef	Ef	E	
Edison Canal Estuary	180701010201				E								Ee	Ef	Ef	E	
Channel Islands Harbor	180701010201				E								Ee	Ef	Ef	E	
Mandakay Bay (Maine)	180701010201				E								Ee	Ef	Ef	E	
Port Huerneme (Harbor)	180701010201				E								Ee	Ef	Ef	E	
Omitond Beach	180701010201				E								Ee	Ef	Ef	E	
Ormond Beach Wetlands c	180701010202				E								Ee	Ef	Ef	E	
Mugu Lagoon c	180701010202				E								Ee	Ef	Ef	E	
Calleguas Creek Estuary c	180701010202				E								Ee	Ef	Ef	E	
<b>LOS ANGELES COUNTY COASTAL</b>																	
Nearshore Zone <sup>a</sup>																	
Offshore Zone																	
Nicholas Canyon Beach	180701040402				E								Ee	Ef	Ef	E	
Trancas Beach	180701040403				E								Ee	Ef	Ef	E	
Zuma County (Westward) Beach	180701040403				E								Ee	Ef	Ef	E	
Dume State Beach	180701040404				E								Ee	Ef	Ef	E	
Dume Lagoon c	180701040403				E								Ee	Ef	Ef	E	
Escondido Beach	180701040404				E								Ee	Ef	Ef	E	
Den Blocker Memorial (Corral) Beach	180701040404				E								Ee	Ef	Ef	E	

\*. This list may not be all inclusive. More areas may be added as information becomes available.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Interim beneficial use

<sup>a</sup>: Nearshore is defined as the zone bounded by the shoreline and a line 1000 feet from the shoreline or the 30-foot depth contours, whichever is further from the shoreline. Longshore extent is from Rincon Creek to the San Gabriel River Estuary.

Footnotes are consistent for all beneficial use tables.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.

b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.

c: Coastal waterbodies which are also listed in Inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).

d: Limited public access precludes full utilization.

e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.

f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.

g: Marine Habitats of the Channel Islands and Mugu Lagoon serve as primary haul-out areas for one or more species (i.e. sea lions)

p: Habitat of the Clapper Rail.

am: Areas of Special Biological Significance (along coast from Laigo Point to Laguna Point) and Big Sycamore Canyon and Abalone Cove Ecological Reserves and Point Fermin Marine Life Refuge.

ar: Areas exhibiting large shellfish populations include Malibu, Point Dume, Point Fermin, White Point and Zuma Beach.

Table 2-3. Beneficial Uses of Coastal Features (Continued).

Los Angeles Regional Water Quality Control Board

COASTAL FEATURE*	WBD No.	MUN	IND	PROC	NAV	POW	COMM	WARM	COLD	EST	MAR	WLD	BIOL	RARE	MIGR	SPAWN	SHELL	WETB
LOS ANGELES COUNTY COASTAL (CONT.)																		
Puerto Beach	180701040404				E						E	E				P	E	
Amanito Beach	180701040404				E						E	E				P	E	
Malibu Beach	180701040404				E						E	E			E	Eas	Ear	
Malibu Lagoon c	180701040404				E					E	E	E		Ea	Ef	Ef	E	E
Carbon Beach	180701040502				E						E	E				P	E	
La Costa Beach	180701040502				E						E	E				P	E	
Las Flores Beach	180701040502				E						E	E				P	E	
Las Tunas Beach	180701040502				E						E	E				P	E	
Topanga Beach	180701040502				E						E	E				P	E	
Topanga Lagoon c	180701040501				E					E	E	E		Ea	Ef	Ef	E	E
Will Rogers State Beach	180701040502				E						E	E				P	E	
Sanja Monica Beach	180701040502				E						E	E				Eas	E	
Venice Beach	180701040502				E						E	E				Eas	E	
Marina Del Rey Harbor	180701040502				E						E	E						
Public Beach Areas	180701040502				E						E	E						
All other Areas	180701040502				E						E	E						
Entrance Channel	180701040502				E						E	E						
Ballona Creek Estuary c, w	180701040200				E						E	E						
Ballona Lagoon Venice Canals c	180701040502				E						E	E						
Ballona Wetlands c	180701040200				E						E	E						
Del Rey Lagoon c	180701040501				E						E	E						
Dockweiler Beach	180701040501		E		E						E	E						
Manhattan Beach	180701040501				E						E	E						
Hermosa Beach	180701040501				E						E	E						
King Harbor	180701040501				E						E	E						
Redondo Beach	180701040501				E						E	E						
Torrance Beach	180701040501				E						E	E						
Port Vicente Beach	180701040501				E						E	E						
Royal Palms Beach	180701040501				E						E	E						

\* This list may not be all inclusive. More areas may be added as information becomes available.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Intermittent beneficial use  
 E, P, and I: shall be protected as required.

Footnotes are consistent for all beneficial use tables.

- a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
- c: Coastal waterbodies which are also listed in Inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).
- e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- ar: Areas exhibiting large shellfish populations include Malibu, Point Dume, Point Fermin, White Point and Zuma Beach.
- as: Most frequently used grunion spawning beaches. Other beaches may be used as well.
- w: These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.

Table 2-3. Beneficial Uses of Coastal Features (Continued).

Los Angeles Regional Water Quality Control Board

COASTAL FEATURE*	WBD No.	MUN	IND	PROC	NAV	POW	COMM	WARM	COLD	EST	MAR	WILD	BIOL	RARE	MGR	SPWN	SHELL	WETB
LOS ANGELES COUNTY COASTAL (Cont.)																		
Whites Point County Beach	180701040601																	
Cabrillo Beach	180701040302																	
Los Angeles - Long Beach Harbor	180701040602																	
Outer Harbor	180701040602																	
Mannings	180701040602																	
Public Beach Areas	180701040602																	
All Other Inlet Areas	180701040602																	
Dominguez Channel Estuary c,w	180701040302																	
Los Angeles River Estuary c,w	180701040404																	
Mamitos Bay	180701040600																	
Los Cerritos Wetlands c	180701040600																	
Los Cerritos Channel Estuary c	180701040600																	
San Gabriel Estuary c, w	180701040606																	
Long Beach Marina	180701040600																	
Public Beach Areas	180701040600																	
All other Areas	180701040600																	
Marine Stadium	180701040600																	
Long Beach	180701040600																	
ISLANDS: NEAR-SHORE ZONES*																		
Atacapa Island	180701070003																	
San Nicolas Island	180701070001																	
Beag Rock Nearshore Zone	180701070001																	
Santa Barbara Island	180701070003																	
Santa Catalina Island	180701070003																	
Santa Catalina Island	180701070002																	
Santa Clemente Island	180701070004																	

\* This list may not be all inclusive. More areas may be added as information becomes available.

- E: Existing beneficial use
- P: Potential beneficial use
- F: Intermittent beneficial use
- E, P, and F: shall be protected as required

\*Asterisked MUN designations are designated under SB 88-63 and RB-03. Some designations may be considered for exemptions at a later date (See pages 2-3 and 2-4 for more details).

c: Nearshore is defined as the zone bounded by the shoreline and a line 1000 feet from the shoreline or the 30-foot depth contours, whichever is further from the shoreline.

Footnotes are consistent for all beneficial use tables.

- a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
- c: Coastal waterbodies which are also listed in Inland Surface Waters Tables (2-1) or in Wetlands Tables (2-4).
- e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- o: Marine Habitats of the Channel Islands and Mugu Lagoon serve as pinniped haul-out areas for one or more species (i.e., sea lions), estuaries.
- u: These areas are engineered channels. All references to Tidal Prisms in Regional Board documents are functionally equivalent to estuaries.
- as: Most frequently used grunion spawning beaches. Other beaches may be used as well.
- at: Areas of Special Biological Significance or ecological reserves.

Table 2-4. Beneficial Uses of Significant Coastal Wetlands.\*

Los Angeles Regional Water Quality Control Board

WETLAND	WEB No.	MON	IND	PROC	AGE	CWR	FRSH	NAV	POW	COM	WARM	COOL	SAL	EST	MAR	WILD	BIOL	RARE	MGR	SPWN	SHELL	NET
Verdugo River Estuary c	18070101006							E		E				E	E	E	E	Ea	Ef	Ef	E	E
Santa Clara River Estuary c	18070102004							E		E				E	E	E	E	Ee	Ef	Ef	E	E
McGuire Lake c	18070103001									P				E	E	E	E	Ee	Ef	Ef	E	E
Orange Beach Wetlands c	18070104002							E		Eg				E	E	E	E	Eap	Ef	Ef	Ea	E
Duna Lagoon c	18070104003							E		E				E	E	E	E	Es	Pf	Pf	E	E
Muga Lagoon c	18070104004							E		E				E	E	E	E	Ea	Ef	Ef	E	E
Tecunga Lagoon c	18070104001							E		E				E	E	E	E	Ea	Ef	Ef	E	E
Bakana Lagoon Wetlands-Carnas c	18070104002							E		E				E	E	E	E	Eg	Ef	Ef	E	E
Bakana Wetlands c	18070104000							E		E				E	E	E	E	Eg	Ef	Ef	E	E
Del Rey Lagoon c	18070104001							E		E				E	E	E	E	Eg	Ef	Ef	E	E
Los Carnas Wetlands c	18070104000							E		E				E	E	E	E	Ea	Pf	Pf	E	E

\*. This list may not be all inclusive. More areas may be added as information becomes available.

Footnotes are consistent for all beneficial use tables.

- a. Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
- b. Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area
- c. Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).
- d. Limited public access precludes full utilization.
- e. One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
- f. Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
- g. Marine Habitats of the Channel Islands and Muga Lagoon serve as pinupped haul-out areas for one or more species (e. sea lions)
- p. Habitat of the Clapper Rail.

E: Existing beneficial use  
 P: Potential beneficial use  
 I: Intermittent beneficial use  
 E, P, and I: shall be protected as required

1 BYRON P. GEE (SBN 190919)  
bgce@nossaman.com  
2 JILL JAFFE (SBN 286625)  
jjaffe@nossaman.com  
3 NOSSAMAN LLP  
4 777 South Figueroa Street, 34<sup>th</sup> Floor  
Los Angeles, California 90017  
5 Telephone: (213) 612-7800  
Facsimile: (213) 612-7801

6 Attorneys for Petitioner  
7 BlackRock Realty Advisors, Inc.  
8

9  
10 **BEFORE THE CALIFORNIA**  
**STATE WATER RESOURCES CONTROL BOARD**

11  
12 In the Matter of the Petition of:  
13 **BLACKROCK REALTY ADVISORS, INC.**  
14 **FOR REVIEW OF THE CALIFORNIA**  
15 **REGIONAL WATER QUALITY CONTROL**  
16 **BOARD, LOS ANGELES REGION'S**  
**FAILURE TO ACT ON PETITIONER'S**  
**REQUEST FOR SITE CLOSURE**

**DECLARATION OF ROBERT Q.**  
**GUTZLER IN SUPPORT OF PETITION**  
**FOR REVIEW**

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1 I, Robert Q. Gutzler, declare as follows:

2 1. I am a Senior Project Professional for SCS Engineers. I am a Professional  
3 Geologist and hold a law degree from the University of San Diego, School of Law. I have  
4 extensive experience preparing environmental assessments and conducting construction  
5 remediation activities, including exploratory excavations, and soil sampling plans for soil, soil  
6 vapor, and groundwater contamination. In connection with these activities, I also often analyze  
7 data to delineate the extent of contamination on affected properties. I have personal knowledge  
8 of the matters set forth herein and, if called upon to do so, I could and would competently testify  
9 as to them.

10 2. SCS Engineers provides environmental consulting services to BlackRock Realty  
11 Advisors, Inc. ("BlackRock") regarding the PortLA site at 300 Westmont Drive, San Pedro,  
12 California (Site ID 2040069) (the "Site"). In this capacity, SCS Engineers prepared the  
13 Technical Report in Support of Request for Closure, which is Exhibit 2 to the Petition.

14 3. Phillips 66 owns the property located on the northern border of the Site. Because  
15 the groundwater beneath the Site flows to the East-Northeast, the groundwater located below the  
16 Phillips 66 property is down-gradient and cross-gradient to the groundwater beneath the Site. I  
17 reviewed public domain reports containing lab data of samples taken from groundwater  
18 monitoring wells that are located on the southern portion of the property owned by Phillips 66.  
19 According to the lab data, Phillips 66 has not detected any contamination that is linked to the free  
20 product or dissolved plumes beneath the Site. Because there is no evidence that the plume has  
21 spread beyond the Site, additional monitoring wells on the northern portion of the Site are  
22 unnecessary.

23 4. I reviewed the agenda for the May 15, 2014 meeting between representatives of  
24 the Regional Board, the State Board, and BlackRock, which is Exhibit 3. The contamination in  
25 groundwater monitoring well MW-24 that was recorded in May 2012, December 2012, and June  
26 2013, referenced in the agenda, does not match the free product that is found at the Site. This  
27 contamination likely occurred because that well was damaged. SCS Engineers has recommended  
28 that well MW-24 be destroyed because it may be acting as a conduit for contamination. Because

1 the contamination in well MW-24 is not consistent with that found at the Site and because of the  
2 damage to well MW-24, these contamination detections are not evidence that the groundwater  
3 plume is unstable or expanding. Similarly, it is unlikely that the dissolved diesel range petroleum  
4 hydrocarbon detections at well MW-20D since June 2013, referenced in the agenda, are from the  
5 free product that still exists at the Site. Well MW-20D is located upgradient from the plume,  
6 meaning that if the plume were to spread, it would move away from well MW-20D.

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

9 Executed on this 12th day of June, 2014 at San Diego, California.

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12 **Robert Q. Gutzler**

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1 BYRON P. GEE (SBN 190919)  
bgee@nossaman.com  
2 JILL JAFFE (SBN 286625)  
jjaffe@nossaman.com  
3 NOSSAMAN LLP  
4 777 South Figueroa Street, 34<sup>th</sup> Floor  
Los Angeles, California 90017  
5 Telephone: (213) 612-7800  
Facsimile: (213) 612-7801

6 Attorneys for Petitioner  
7 BlackRock Realty Advisors, Inc.

8  
9  
10 **BEFORE THE CALIFORNIA**  
**STATE WATER RESOURCES CONTROL BOARD**

11  
12 In the Matter of the Petition of:  
13 **BLACKROCK REALTY ADVISORS, INC.**  
14 **FOR REVIEW OF THE CALIFORNIA**  
15 **REGIONAL WATER QUALITY CONTROL**  
16 **BOARD, LOS ANGELES REGION'S**  
**FAILURE TO ACT ON PETITIONER'S**  
**REQUEST FOR SITE CLOSURE**

**DECLARATION OF DANIEL E.**  
**JOHNSON IN SUPPORT OF PETITION**  
**FOR REVIEW**

1 I, Daniel E. Johnson, declare as follows:

2 1. I am the Vice President, Southwest Environmental Services Director, for SCS  
3 Engineers. I have managed or been involved with well over 1,000 site assessments and over 100  
4 site closures. Projects have ranged from construction/remediation projects to site assessments,  
5 including subsurface investigations of chemicals in the vadose and groundwater zones and  
6 remediation efforts using bioremediation and vapor extraction technologies. I have also worked  
7 on a diverse array of projects relating to regulatory compliance, and water quality and supply,  
8 including with the State Water Resources Control Board and the Regional Water Quality Control  
9 Board for the Los Angeles Region. I have personal knowledge of the matters set forth herein  
10 and, if called upon to do so, I could and would competently testify as to them.

11 2. SCS Engineers provides environmental consulting services to BlackRock Realty  
12 Advisors, Inc. ("BlackRock") regarding the PortLA site at 300 Westmont Drive, San Pedro,  
13 California (Site ID 2040069) (the "Site"). In this capacity, SCS Engineers prepared the  
14 Technical Report in Support of Request for Closure, which is Exhibit 2 to the Petition.

15 3. The Site is located above the West Coast Groundwater Basin ("basin"), which is  
16 an adjudicated water basin managed by a watermaster – the California Department of Water  
17 Resources. The Water Replenishment District ("WRD") maintains and manages the groundwater  
18 to ensure that a reliable supply is available through its water projects and water supply programs.  
19 I spoke with Mr. Ted Johnson at WRD about the beneficial uses, if any, that are anticipated for  
20 the shallow groundwater below the Site on or about June 10, 2014. He reiterated what has been  
21 relayed to SCS staff previously, told me that because the groundwater below the Site is located  
22 seaward of the Dominguez Gap Barrier Project, the shallow groundwater in the portion of the  
23 basin beneath the Site is of poor quality and beneficial uses are not probable. While in theory it  
24 is possible the groundwater could be used, it would require extensive treatment to address high  
25 dissolved solids or salt content and is therefore unlikely. Moreover, I understand that WRD does  
26 not anticipate that this water will be slated for any beneficial use in the future. Mr. Ted Johnson  
27 encouraged me to contact the Watermaster for Basin, the Department of Water Resources, to  
28 further understand the potential uses of groundwater at the Site and in the vicinity.

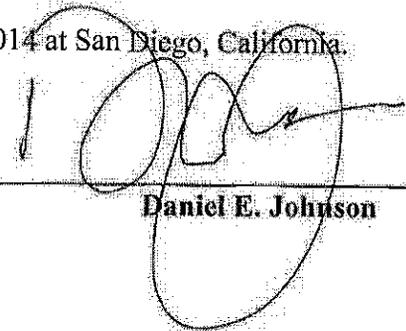
Declaration of Daniel E. Johnson

1           4.       Mr. Bob Pierotti, Deputy Watermaster, was contacted by me on June 11, 2014, to  
2 discuss possible beneficial uses of groundwater at the Site and in the Site vicinity. Mr. Pierotti  
3 indicated that the groundwater basin is adjudicated and water use rights have previously been  
4 established. Based on my conversation with Mr. Pierotti, it is my understanding that in order for  
5 someone to install and use a well in the West Coast Basin, which comprises the Site, they would  
6 have to have an existing right to use the groundwater. SCS is unaware of any groundwater pump  
7 installation or person claiming it has water rights on the Site or downgradient of the Site.  
8 Furthermore, if an entity does not have such a right, it would have to be obtained through  
9 purchase or lease, which seems unlikely given the poor water quality that would be the result.

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

12           Executed on this 11 th day of June, 2014 at San Diego, California.

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**Daniel E. Johnson**