



March 5, 2015

VIA EMAIL to USTClosuresComments@waterboards.ca.gov

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

Comment Letter – Tamco Interprises Proposed UST Case Closure

Golden State Water Company (GSWC) has received the State Water Resources Control Board's (SWRB) "Notice of Opportunity for Public Comment Tamco Interprises Proposed UST Case Closure" letter dated December 19, 2014. Based on review of the publically available documents related to the subject underground storage tank (UST) site (e.g., see http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603729356) GSWC respectfully offers the following comments:

- GSWC, as opposed to the Metropolitan Water District of Southern California, which is incorrectly identified in association with General Criterion a of the 11/30/14 Low Threat Closure Policy checklist, owns and operates four public water-supply wells within a one-mile radius of the site (not including destroyed wells owned by GSWC). Two of these wells (Ballona 4 and 5) are located about 3,000 feet northeast (generally downgradient at times) of the subject UST site, and the other two wells (Southern 5 and 6) are located about 3,000 feet east (generally downgradient at times), based on Fall 2013 groundwater elevation contours for the principal aquifers in the area, which were obtained from the Water Replenishment District of Southern California (WRD).
- The uppermost perforations in these wells occur at 300 and 290 feet below ground surface (bgs) for GSWC's Ballona 4 and 5 wells, and at 420 and 400 feet bgs for GSWC's Southern 5 and 6 wells, or approximately 163, 153, 332, and 502 feet below mean sea level, respectively.
- Based on data obtained from WRD and for the BP HITCO site at 1600 West 135th Street (http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL204791669), a downward vertical hydraulic gradient between the shallow unconfined

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aquifer and deeper drinking water aquifers exists in the area, which increases the threat to drinking water aquifers posed by contaminants released at the site.

- As described in the 12/12/2014 UST Case Closure Summary, and based on data for the BP HITCO site at 1600 West 135th Street and data obtained from WRD, at least one aquitard appears to exist between the shallow unconfined aquifer and deeper drinking water aquifers in the area, which may impede downward migration of contaminants that may have been released at the site.
- Regular sampling of GSWC's Ballona 4 well (CDPH Source ID = 1910155-043), Ballona 5 (CDPH Source ID = 1910155-069), Southern 5 well (CDPH Source ID = 1910155-039), and Southern 6 well (CDPH Source ID = 1910155-045) since they were installed between 1988 and 2005, suggests that fuel-related organic compounds have not been detected in groundwater produced by the wells.
- The 12/12/14 UST Case Closure Summary indicates that the site was operated as a vehicle maintenance facility, which is consistent with the presence of an oil interceptor and sump, as shown in the 1/29/99 Underground Storage Tank Removal Report. Because solvents have sometimes been used during vehicle maintenance operations and because of the limited publically available information, it is not clear if soil or groundwater samples have been collected and analyzed for chlorinated volatile organic compounds (VOCs), which have been detected in shallow groundwater near the southern edge of the site, at 1600 West 135th Street. Thus, it is unclear whether General Criterion b of the 11/30/14 Low Threat Closure Policy checklist has been met for the site.
- According to the 1/29/99 Underground Storage Tank Removal Report, which may constitute the only contamination assessment-like documentation for the site, soil samples were collected from 4 feet beneath the former USTs (potentially about 14 feet bgs). However, it is unclear whether any additional vadose zone samples were subsequently collected below the USTs and nearer to the water table, which was likely at a depth of about 30 feet bgs at the time based on data from the BP HITCO site at 1600 West 135th Street. In addition, it is unclear whether samples were collected beneath the fuel dispensers or piping, as indicated in Appendix B of the 1/29/99 Underground Storage Tank Removal Report. Thus, it is not clear if the extent of contamination documented beneath the former USTs has been determined and whether General Criterion e of the 11/30/14 Low Threat Closure Policy checklist has been met.
- Because of the limited amount of publically available information, it is not clear whether contaminated soil was excavated and removed from the site, so

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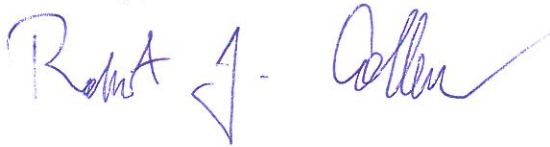
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it is unclear whether General Criterion f of the 11/30/14 Low Threat Closure Policy checklist has been met.

- The 11/21/13 UST Path to Closure Plan identifies impediments to site closure and indicates that a work plan be developed to define the extent of the release documented at the site. However, it is not clear from the limited publically available information whether site assessment activities have been performed. In particular, it is unclear whether potential impacts to groundwater from fuel contamination in soil have been evaluated at the site. Thus, GSWC is unable to comment on potential impacts to drinking water aquifers in the area from operations at the subject site.

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

Sincerely,



Robert J. Collar, PG, CHG
Senior Hydrogeologist

cc: George Lockwood, State Water Resources Control Board
Matthew Cohen, State Water Resources Control Board
Kattya Batres Rinze, Los Angeles County Department of Public Works
Phuong Ly, Water Replenishment District of Southern California
David Chang, GSWC
Toby Moore, GSWC
Alex Chakmak, GSWC