STATE WATER RESOURCES CONTROL BOARD (STATE WATER BOARD)
DIVISION OF WATER QUALITY RESPONSE TO COMMENTS ON THE PROPOSED UST CASE CLOSURE OF RANCHO LOS AMIGOS HOSPITAL (NORTH CAMPUS), 7601 EAST IMPERIAL HIGHWAY, DOWNEY (SITE)

We received one comment letter during the public comment period, which ended on May 15, 2015, at noon. The comments and our responses are presented here.

Comment letter received:

Mr. Robert J. Collar, represents the Golden State Water Company (GSWC)

COMMENT 1: The subject UST site resides outside of the boundaries of GSWC's Hollydale system (state Division of Drinking Water [DDW] No. 1910195), and may possibly fall within the boundaries of the Rancho Los Amigos Medical Center (No. 1900679), City of Downey (No. 1910034), or another public water system. However, the Geo Tracker website incorrectly identifies Golden State Water Company in association with General criterion a of the 8/5/14 Low- Threat Closure Policy (LTCP) checklist.

RESPONSE: Thank you for your comment. GeoTracker has been corrected to reflect your comment.

COMMENT 2: GSWC owns and operates one public water-supply well within a one-mile radius of the site (not including destroyed wells owed by GSWC). GSWC's McKinley 3 well is located about 4,960 feet south-southeast (nearly downgradient) of the subject UST site, based on Fall 2014 groundwater elevation contours for the principal aquifers in the basin, which were obtained from the Water Replenishment District of Southern California.

RESPONSE: Thank you for this information. State Water Board believes that drinking water wells just under a mile away will not be threatened by the remaining petroleum constituents at this Site.

COMMENT 3: The uppermost perforations in this well occur at 602 feet below ground surface (bgs), or approximately 515 feet below mean sea level.

RESPONSE: Thank you for this information. The producing aquifer is at 602 feet bgs.

COMMENT 4: Based on data obtained from Water Replenishment District of Southern California and for the nearby Anadite, Inc. Site (see http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL2041C1504), a downward vertical hydraulic gradient between the shallow unconfined aquifer and deeper drinking water aquifers exists in the area, which increases the threat to drinking water aquifers posed by contaminants that have been released at the site.

RESPONSE: State Water Board agrees that downward hydraulic gradients exist in the LA Basin.

COMMENT 5: Based on data obtained from Water Replenishment District of Southern California, a few aquitards appear to exist between the shallow unconfined aquifer and deeper drinking water aquifers in the area, which may impede downward migration of contaminants that have been released at the site.

RESPONSE: Comment noted.

COMMENT 6: Regular sampling of GSWC's Mckinley 3 well (DDW Source ID = 1910195004), since the late-1980's suggests that, with the exception of chlorinated solvents such as perchloroethene of trichloroethene, fuel-related volatile organic compounds (VOCs) have not been detected in groundwater produced by the well.

RESPONSE: Comment noted.

COMMENT 7: The 8/5/14 LTCP checklist suggests that a groundwater contamination plume exists at the site (see media-specific criterion 1). This contrasts with the 2/27/15 UST Case Closure Summary, which indicates that site releases have likely not affected groundwater. Thus, it is unclear whether former USTs at the site affected groundwater. In addition, direct-push rig grab samples GW-1, GW-2, and GW-3 collected in 2013 near former USTs 8, 12, and 13 might not be representative of groundwater based on detection of drinking water disinfection by-products (i.e., chloroform, bomoform, bromodichloromethane, and dibromochlormethane) potentially related to potable water (e.g., from leaking water system or landscape irrigation pipes). Because of this, and the limited number of groundwater samples in close proximity to former USTs at the site, GSWC is unable to comment on potential impacts to drinking water aquifers in the area from operation of USTs at the subject site.

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RESPONSE: Thank you for your observations. There have been 14 groundwater samples collected from 48 to 100 feet bgs in five different areas. None of the samples detected petroleum constituents. However potable water by-products were detected. This would indicate that surface watering had migrated to groundwater, but petroleum constituents had not. GeoTracker has been updated to reflect that petroleum constituents have not affected groundwater and no groundwater plume exists.

6/03/2015

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Senior Water Resource Control Engineer

Date