

EDMUND G. BROWN JR.  
GOVERNORMATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

### UST CASE CLOSURE SUMMARY

#### Agency Information

Current Agency Name: State Water Resources Control Board (State Water Board)	Address: 1001 I Street, P.O. Box 2231 Sacramento, CA 95812
Current Agency Caseworker: Mr. Matthew Cohen	Case No.: N/A

Former Agency Name: City of Santa Monica (Prior to 7/1/2013)	Address: 333 Olympic Drive, 2nd Floor Santa Monica, CA 90401
Former Agency Caseworker: Ms. Monica Hanley	Case No.: N/A

#### Case Information

USTCF Claim No.: None	Global ID: T0603701404
Site Name: Livingston Graham	Site Address: 1637 19 <sup>th</sup> Street Santa Monica, CA 90404 (Site)
Responsible Party: Lehigh Hanson Attention: Mr. Steve Zacks	Address: 681 Aspen Circle Oxnard, CA 93030
USTCF Expenditures to Date: N/A	Number of Years Case Open: 21

URL: [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0603701404](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603701404)

#### Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case meets all of the required criteria of the Policy.

The release at the Site was discovered when four USTs, previously abandoned in place, were removed in March 1993 and confirmation soil sampling indicated residual petroleum constituents. In March 1993 a bioremediation bacteria and nutrients were placed into the excavation. Approximately 900 cubic yards of previously excavated soil were treated with bacteria and nutrient solutions and placed back into the excavation. Remediation confirmation soil samples were collected and indicated lower levels of petroleum constituents. Residual petroleum constituents were still present in soil down to 60 feet below ground surface (bgs). A 2001 investigation showed petroleum constituents present in soil from 10 to 70 feet bgs. Soil from 70 to 114 feet bgs was not impacted. A Limited Soil Gas Survey and Human Health Risk Assessment were performed at the Site in January 2012. Petroleum constituents in soil gas were below Policy criteria for commercial property use.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

Livingston Graham  
1637 19<sup>th</sup> Street, Santa Monica, Los Angeles County

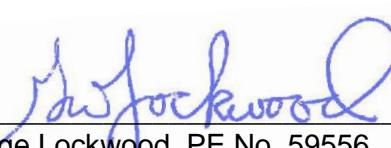
The depth to groundwater is approximately 114 feet bgs. The nearest public supply well and surface water body are greater than 1,000 feet from the Site. Additional corrective action will not likely change the conceptual site model. Any remaining petroleum constituents pose low risk to human health, safety, and the environment.

### Rationale for Closure under the Policy

- General Criteria – Site **MEETS ALL EIGHT GENERAL CRITERIA** under the Policy.
- Groundwater Media-Specific Criteria – Site releases **HAVE NOT LIKELY AFFECTED GROUNDWATER**. Soil impact does not contain sufficient mobile constituents (leachate, vapors, or light non-aqueous liquids) to cause groundwater to exceed the groundwater criteria.
- Petroleum Vapor Intrusion to Indoor Air Criteria – Site meets **CRITERION 2 (b)**. A Site-specific risk assessment of the vapor intrusion pathway was conducted. The assessment found that there is low risk of petroleum vapors adversely affecting human health, safety, or the environment. A Limited Soil Gas Survey and Human Health Risk Assessment performed by Brown and Caldwell on January 21, 2012, demonstrated that human health is protected.
- Direct Contact and Outdoor Air Exposure Criteria – Site meets **CRITERION 3 (a)**. Maximum concentrations in soil are less than those in Policy Table 1 for residential use, and the concentration limits for a Utility Worker are not exceeded. The estimated naphthalene concentrations are less than the thresholds in Table 1 of the Policy for direct contact. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2% benzene and 0.25% naphthalene. Therefore, benzene concentrations can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Table 1 of the Policy. Therefore, estimated naphthalene concentrations meet the thresholds in Table 1 of the Policy criteria for direct contact with a safety factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

### Recommendation for Closure

The corrective action performed at this Site ensures the protection of human health, safety, and the environment, and is consistent with chapter 6.7 of the Health and Safety Code and implementing regulations, applicable state policies for water quality control, and the applicable water quality control plan, and case closure is recommended.

  
George Lockwood, PE No. 59556  
Senior Water Resource Control Engineer

4/18/14

Date

