



Golden State
Water Company
A Subsidiary of American States Water Company

December 29, 2014

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 – LA CO DPW Road MD4 Hollydale 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 LA CO DPW Road MD4 Hollydale Proposed UST Case Closure" letter dated October 14, 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=T10000002819) GSWC respectfully offers the following comments:

- GSWC owns and operates two public water-supply wells within a one-mile radius of the site (not including destroyed wells owned by GSWC). One of these wells (Century 1) is located about 3,360 feet downgradient (southwest) of the subject UST site, based on Fall 2012 groundwater elevation contours for the principal aquifers in the basin, which were obtained from the Water Replenishment District of Southern California, and July 2014 groundwater elevation contours associated with the chlorinated solvent-impacted Former Anadite South Gate Facility to the north (http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL2041C1504). The other well (McKinley 3) is located about 5,160 feet southeast of the subject UST site.
- The uppermost perforations in these wells occur at 232 (downgradient well) and 602 feet below ground surface (bgs), or approximately 150 and 515 feet below mean sea level, respectively.
- Based on data obtained from Water Replenishment District of Southern California, a downward vertical hydraulic gradient between the shallow unconfined aquifer and deeper drinking water aquifers exists in the area,

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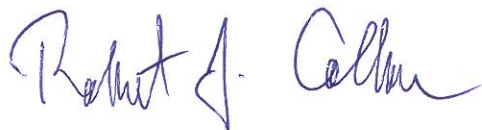
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which increases the threat to drinking water aquifers posed by contaminants that may have been released at the site.

- 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 may have been released at the site.
- Regular sampling of GSWC's Century 1 well (CDPH Source ID = 1910195-001) and McKinley 3 (CDPH Source ID = 1910195-004), since the mid-to late-1980s suggests that, with the exception of chlorinated solvents such as perchloroethene or trichloroethene, fuel-related volatile organic compounds (VOCs) have not been detected in groundwater produced by the wells.
- It appears as though USTs containing automobile fuel have been present at the site for at least 63 years (i.e., since 1951). In addition, a 4/19/2007 memo requests a work plan to define the lateral and vertical extent of reported soil contamination associated with the USTs. However, no documents describing site investigation activities conducted subsequent to this memo are available via the GeoTracker web page for this site. In addition, the 12/16/13 Low-Threat UST Case Closure Policy (LTCP) checklist available via the link for the subject UST site (above) suggests that LTCP general criterion e has not been satisfied (i.e., a conceptual site model has not been developed). This contrasts with the 10/1/14 UST Case Closure Summary, which seems to imply that a conceptual site model exists. Thus, due to the scarcity of site assessment information available, GSWC is unable to comment on potential impacts to drinking water aquifers in the area from operation of USTs at the subject site.

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

Sincerely,

A handwritten signature in blue ink that reads "Robert J. Collar". The signature is fluid and cursive, with the first name being the most prominent.

Robert J. Collar, PG, CHG
Senior Hydrogeologist

cc: George Lockwood, State Water Resources Control Board
Matthew Cohen, State Water Resources Control Board
Yue Rong, Los Angeles Regional Water Quality Control Board
John Awujo, Los Angeles County Department of Public Works

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Phuong Ly, Water Replenishment District of Southern California
David Chang, GSWC
Toby Moore, GSWC
Lisa Miller, GSWC