



Los Angeles Regional Water Quality Control Board

September 17, 2019

Ms. Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, CA 90012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7018 1130 0001 5911 3564

Attn: Mr. Lester Miyoshi, Facilities Project Manager

UNDERGROUND STORAGE TANK PROGRAM – REVIEW OF SITE ASSESSMENT WORK PLAN

**LOMITA SHERIFF'S STATION
26123 NARBONNE AVENUE, LOMITA
(CASE NO. R-05421) (GLOBAL ID NO.: T10000013029)**

Dear Ms. Jue:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within the Los Angeles and Ventura counties. As such, the Los Angeles Regional Board is the lead regulatory agency for overseeing corrective actions (assessment and/or monitoring activities) and cleanup of releases from leaking underground storage tank (UST) systems at the subject site (Site).

Pursuant to Health and Safety Code Section 25296.10, Los Angeles County Sheriff's Department (Department) is required to take corrective actions (i.e. Preliminary Site Assessment, Soil and Water Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety, and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), Title 23, Chapter 16, Sections 2720 through 2727.

Los Angeles Regional Board staff has received your "Site Assessment Work Plan" (Work Plan) dated August 30, 2019, prepared by Alta Environmental (Alta), on behalf of the Department. Los Angeles Regional Board staff has reviewed the Work Plan and information in our case file for the Site.

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

Site Background

In August 1987, four USTs (one 12,000-gallon unleaded gasoline UST, one 8,000-gallon leaded gasoline UST, one 2,000-gallon diesel UST, and one 550-gallon waste oil UST) were removed from the Site. Laboratory data for soil samples collected beneath each UST for analytical testing indicated no detections of total petroleum hydrocarbons (TPH) above the reporting limit. One soil boring was advanced to 40 feet below ground surface (bgs) in the area of apparent hydrocarbon contamination north of the former gasoline USTs. Soil samples collected from the soil boring at five-foot intervals were composited prior to submitting for chemical testing. Laboratory results for the composite soil sample indicated concentrations of xylenes at 1.3 mg/kg and TPH as gasoline (TPHg) at 8.3 mg/kg.

The second generation of USTs (one 12,000-gallon unleaded gasoline UST and one 1,000-gallon diesel UST) were installed at the Site in the same general area as the first. In February 1999, both USTs were removed from the Site. Soil samples were collected beneath the former USTs and from the excavated soil stockpiles and submitted for chemical testing. Laboratory results for the soil samples collected from the soil stockpiles indicated concentrations of TPHg up to 800 mg/kg, TPH as diesel (TPHd) up to 270 mg/kg, benzene at 0.070 mg/kg, toluene at 2.3 mg/kg, ethylbenzene at 6.4 mg/kg, and xylenes at 42 mg/kg. Laboratory results for soil samples collected beneath the former USTs did not detect TPHg, TPHd, and benzene, toluene, ethylbenzene, and xylenes (BTEX) above the reporting limit. Methyl tertiary butyl ether (MTBE) was not detected above the reporting limit in all soil samples tested. Following removal UST removal activities, a new 12,000-gallon dual-compartment UST, used to store gasoline and diesel fuel, was installed in the same location as the previous 12,000-gallon unleaded gasoline UST. The dual-compartment UST is currently in active service at the Site.

The Los Angeles Regional Board received notification of benzene detection in the City of Lomita Well No. 5 located at the south end of Cypress Street in the City of Lomita, approximately 450 feet west of the Site. Analytical testing data from City of Lomita Well No. 5 reported concentrations of benzene at 0.54 microgram per liter ($\mu\text{g/L}$) in May 2018, 3.2 $\mu\text{g/L}$ in April 2019, and 3.7 $\mu\text{g/L}$ in May 2019, and the well was subsequently taken off-line because these concentrations are above the Maximum Contaminant Level (MCL) of 1 $\mu\text{g/L}$ for benzene. The Los Angeles Regional Board initiated an investigation to identify the source(s) of benzene impacting City of Lomita Well No. 5. As USTs were used at the Site to store gasoline and the Site may be hydrologically upgradient from Lomita Well No. 5, the Site was identified as a potential source.

Review of Site Assessment Work Plan

In order to evaluate the presence of petroleum hydrocarbons in soil and groundwater at the Site, Alta proposes to advance four soil borings in the vicinity of the UST area and one soil boring along the western property boundary using a drill rig equipped with hollow-stem augers. Each boring will be advanced at least 20 feet below the depth of the uppermost groundwater encountered, which is anticipated to be encountered at 100 feet bgs. Soil samples will be collected at five-foot intervals in each boring for

lithological logging purposes, field screening using a photo-ionization detector (PID), and for submission to an analytical laboratory for chemical testing. Soil samples will be analyzed for TPHd and TPH oil range (TPHo) by modified Environmental Protection Agency (EPA) Method 8015B and for TPHg and volatile organic compounds (VOCs) including BTEX, fuel oxygenates, and ethanol by EPA Method 8260B. In addition, Alta recommends that soil samples collected between 5 and 40 feet bgs in the soil boring near the UST area be analyzed for total lead by EPA Method 6010B.

Upon advancing the soil borings at least 20 feet into groundwater, the soil borings will be completed as groundwater monitoring wells with a screen interval that extends approximately 10 feet above and 20 feet below the groundwater surface. Each well will be developed using a surge block and stainless-steel bailer. All wells will be surveyed by a California-licensed land surveyor. Approximately one week following well development activities, all five wells will be monitored and sampled. Groundwater samples will be submitted to an analytical laboratory to be tested for TPHg and VOCs including BTEX, fuel oxygenates, and ethanol by EPA Method 8260B. TPHd and TPHo may also be analyzed depending on laboratory results for the soil samples collected at the Site. Alta proposes to complete three additional groundwater monitoring events at the Site on a quarterly basis.

Los Angeles Regional Board Comments (per CCR, Title 23, Chapter 16, §2724)

Los Angeles Regional Board staff has the following comments regarding the proposed activities contained in the Work Plan:

1. Los Angeles Regional Board staff concur with the advancement of the proposed five soil borings and the completion of those borings as groundwater monitoring wells.
2. Soil samples shall be collected in the proposed soil borings at five-foot intervals beginning at five feet bgs, at changes in soil lithology, and at areas of obvious contamination for geologic logging. All soil samples collected must be preserved in accordance with EPA Method 5035 for chemical testing.
3. In addition to the proposed analytical testing suite, soil samples collected at 5 and 10 feet bgs in soil boring MW-3 shall also be analyzed for poly-aromatic hydrocarbons (PAHs) by EPA Method 8270.
4. The construction and development of groundwater monitoring wells must comply with requirements prescribed in the California Well Standards (Bulletin 74-90), published by the California Department of Water Resources (can be viewed at http://wdl.water.ca.gov/waterdatalibrary/docs/historic/Bulletins/Bulletin_74/Bulletin_74-90_1991.pdf). The professional in responsible charge shall review the borings and assume responsibility for the accuracy and completeness of the logs.
5. Soil borings not completed as monitoring wells must be properly sealed per Section 23 of the California Well Standard.

6. All groundwater monitoring wells must be surveyed to a benchmark for known elevation above mean sea level by a California-licensed land surveyor.
7. The Department is required to submit a technical report detailing the results of the site investigation and well installation activities to the Los Angeles Regional Board by **December 16, 2019**. The report must include, at a minimum, a scaled site map, soil boring log(s), soil analytical results, a summary of field activities, an evaluation of the data, and recommendations. Based on the data, additional site investigation and monitoring well installation activities may be required.

Groundwater Monitoring Requirement (CCR, Title 23, Chapter 16, §2724)

Following the installation and development of the monitoring wells, the Department is required to commence a quarterly groundwater monitoring program at the Site and must meet the following requirements:

8. All groundwater monitoring wells associated with the Site must be monitored.
9. Groundwater monitoring and submission of quarterly monitoring reports shall be conducted according to the following schedule:

<u>Reporting Period</u>	<u>Report Due Date</u>
January – March	April 15th
April – June	July 15th
July – September	October 15th
October – December	January 15th

The quarterly groundwater monitoring report for the reporting period of October 2019 through December 2019 is due to the Los Angeles Regional Board by **January 15, 2020**.

General Requirements

10. Soil and groundwater samples must be analyzed by Cal-LUFT GC/FID or Cal-LUFT GC/MS Method for TPHg and TPHd, when diesel is identified at the Site, and by EPA Method 8260B for BTEX, naphthalene, and fuel oxygenate compounds including MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). Ethanol is also required and shall be analyzed by either method above. As a waste oil UST was used at the Site, the full suite of aromatic and chlorinated analytes must also be tested and reported per EPA Method 8260B. The analytical detection limits must conform to the Los Angeles Regional Board General Laboratory Testing Requirements (9/06) (http://www.waterboards.ca.gov/losangeles/publications_forms/forms/ust/lab_forms/labreq9-06.pdf). All respective analytical methods must be certified by the California Environmental Laboratory Accreditation Program (ELAP). All analytical data must be reported by a California-certified laboratory.

11. The contractor who conducts the environmental work as required in this directive shall, at all times, comply with all applicable State laws, rules, regulations, and local ordinances specifically including, but not limited to, environmental, procurement, and safety laws, rules, regulations, and ordinances. The contractor shall obtain the services of a Professional Geologist or Engineer, Civil (PG/PE-Civil) to comply with the applicable requirements of the Business and Professions Code, sections 6700 et seq. and/or 7800 et seq. implementing regulations for engineering or geological analysis and interpretation for this case. All documents prepared by the contractor that reflect or rely upon engineering or geological interpretations by the contractor shall be signed and stamped by the PE-Civil/PG indicating her/his responsibility for them, as required by the Business and Professions Code.
12. The Department is required to obtain all necessary permits from the appropriate agencies and make all required notifications prior to the start of work.
13. Please provide Los Angeles Regional Board staff a minimum of **10 days** advance notice by email (jamesw.ryan@waterboards.ca.gov) prior to commencing any field work.

Regulatory Requirement for Electronic Submission of Laboratory Data to the State GeoTracker Internet Database

On September 30, 2004, the State Water Resources Control Board (State Board) adopted the resolution to revise regulations in Chapter 30, Division 3 of Title 23 of CCR, which requires persons to ensure electronic submission of laboratory analytical data (i.e., soil or water chemical analysis) and locational data (i.e., location and elevation of groundwater monitoring wells) via the Internet to the State Board's GeoTracker database. The regulations and other background information are available at <http://geotracker.waterboards.ca.gov>.

In accordance with the regulations, the Department must upload the following information to the State Board's GeoTracker database: reports and work plans (in PDF format), laboratory analytical data (in electronic data format [EDF]), monitoring event information in GEO_WELL format, an updated site map (GEO_MAP) showing any monitoring well locations, boring logs in PDF (GEO_BORE) to be used to link to well locations, monitoring well latitude and longitude (GEO_XY) survey data, and monitoring well elevation data (GEO_Z). Hard copy paper reports, which have already been electronically uploaded to the GeoTracker data base, are no longer required to be submitted to the Los Angeles Regional Board.

Enforcement

Pursuant to Health and Safety Code section 25299, subdivision (d), any person who violates any corrective action requirement established by, or issued pursuant to, section 25296.10 is liable for a civil penalty of not more than ten thousand dollars (\$10,000) for each underground storage tank for each day of violation. A civil penalty may be imposed by civil action pursuant to Health and Safety Code section 25299, subdivision (d)(2) or imposed administratively by the Los Angeles Regional Board pursuant to California Water Code (CWC) sections 13323 through 13328. The Los Angeles Regional Board may also

request that the Attorney General seek judicial civil liabilities or injunctive relief pursuant to CWC sections 13264, 13304, and 13340. The Los Angeles Regional Board reserves its rights to take any further enforcement action authorized by law.

If you have any questions regarding this matter, please contact Dr. Weixing Tong at (213) 576-6715 or at weixing.tong@waterboards.ca.gov, or Mr. James W. Ryan IV at (213) 576-6711 or at jamesw.ryan@waterboards.ca.gov.

Sincerely,



Renee Purdy
Executive Officer

cc: Ric Roda, State Water Resources Control Board, Division of Drinking Water
Brian Partington, Water Replenishment District of Southern California
Tim Smith, Los Angeles County Department of Public Works,
Environmental Program Division
Carla Dillon, City of Lomita, Department of Public Works
Kelly Chiu, Los Angeles County Sheriff's Department, Facilities Planning Bureau
Jennifer Fang, Los Angeles County Sheriff's Department,
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