



Los Angeles Regional Water Quality Control Board

July 14, 2020

ExxonMobil Oil Corporation
Attn: Ms. Marla D. Madden
8941 Atlanta Avenue, #384
Huntington Beach, CA 92646

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 0700 0001 9921 1645

Hanukah, Inc.
Attn: Mr. Vahid Vahdat
25808 South Narbonne Avenue
Lomita, CA 90717

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 0700 0001 9921 1652

Mr. Bharat Bhattarai
Agent for Service of Process for
Petroleum Management & Marketing
28441 Highridge Road, Suite 101
Rolling Hills Estate, CA 90274

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 0700 0001 9921 1669

UNDERGROUND STORAGE TANK PROGRAM – WORK PLAN REQUIREMENT

**PACIFIC SHELL SERVICE STATION (FORMER SAFAR EXXON-MOBIL AND MOBIL SERVICE STATION #18-MRC)
25808 SOUTH NARBONNE AVENUE, LOMITA
(CASE NO. I-05152C) (GLOBAL ID NO. T10000013273)**

Dear Ms. Madden, Mr. Vahdat, and Mr. Bhattarai,

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 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, ExxonMobil Oil Corporation, Hanukah, Inc., and Petroleum Management & Marketing (collectively “Responsible Parties”) are required to take corrective actions (i.e. Preliminary Site Assessment, Soil

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

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 the document titled "Site Assessment Report" (Report) dated March 16, 2020, prepared by ETIC, on behalf of ExxonMobil Oil Corporation. Los Angeles Regional Board staff has reviewed the Report and other information in our case file for the Site.

Review of Site Assessment Report

In February 2020, ETIC oversaw the advancement of one soil boring at the Site to 140 feet below ground surface (bgs). Groundwater was encountered in the soil boring at approximately 138 feet bgs. Soil samples were collected in the soil boring at five-foot intervals beginning at five feet bgs. A grab groundwater sample was also collected in the soil boring. Soil and grab groundwater samples were submitted to an analytical laboratory to be tested for total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd) by modified Environmental Protection Agency (EPA) Method 8015B and for the full list of volatile organic compounds (VOCs), including fuel oxygenates, by EPA Method 8260B. Soil samples collected at 5 and 10 feet bgs were also tested for polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270C. Laboratory results for the soil samples indicated maximum concentrations of TPHg of 4,700 milligrams per kilogram (mg/kg), TPHd of 66 mg/kg, benzene of 130 mg/kg, toluene of 2,200 mg/kg, ethylbenzene of 410 mg/kg, xylenes of 2,400 mg/kg, naphthalene of 73 mg/kg, methyl tertiary butyl ether (MTBE) of 0.062 mg/kg, and tertiary butyl alcohol (TBA) of 0.034 mg/kg. Laboratory results for the grab groundwater sample indicated concentrations of TPHg of 3,900 micrograms per liter ($\mu\text{g/L}$), TPHd of 710 $\mu\text{g/L}$, benzene of 62 $\mu\text{g/L}$, toluene of 260 $\mu\text{g/L}$, ethylbenzene of 240 $\mu\text{g/L}$, xylenes of 1,000 $\mu\text{g/L}$, naphthalene of 210 $\mu\text{g/L}$, MTBE of 74 $\mu\text{g/L}$, and TBA of 78 $\mu\text{g/L}$.

Work Plan Requirement (per CCR, Title 23, Chapter 16, §2726)

Based on site investigation data, the extent of soil and groundwater contamination at the Site has not been delineated. The Responsible Parties are required to submit a work plan for the advancement of soil borings at the Site and the completion of those soil borings as groundwater monitoring wells. Enough soil borings and monitoring wells to delineate soil and groundwater impacts and determine groundwater flow direction must be proposed in the work plan. The work plan is due to the Los Angeles Regional Water Board by **August 13, 2020**.

The Responsible Parties must jointly comply with Los Angeles Regional Board requirements. Los Angeles Regional Board staff encourages the Responsible Parties to work together to meet Los Angeles Regional Board requirements.

General Requirements

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 PG/PE-Civil indicating her/his responsibility for them, as required by the Business and Professions Code.

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 Responsible Parties 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

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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
Ryan Haughey, ETIC
George Zoumalan, Ramtox Corporation