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## Los Angeles Regional Water Quality Control Board

September 8, 2020

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO.: **7018 1130 0001 5911 2536**

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO.: **7018 1130 0001 5911 2543**

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.: **7018 1130 0001 5911 2550**

### **UNDERGROUND STORAGE TANK PROGRAM – REVIEW OF WELL INSTALLATION WORK PLAN**

**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 and Water Investigation, Corrective Action Plan Implementation, and Verification

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

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 "Well Installation Work Plan, 25808 Narbonne Avenue, Lomita, California 93620, Case No. I-05152C" (Work Plan) dated August 13, 2020, prepared by ETIC, on behalf of ExxonMobil Oil Corporation and Hanukah, Inc. Los Angeles Regional Board staff has reviewed the Work Plan 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. 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  $\mu\text{g/L}$ .

### **Review of Well Installation Work Plan**

To determine the extent of soil and groundwater contamination at the Site, ETIC proposes to advance three soil borings (MW-1, MW-2, and MW-3) to approximately 150 feet below ground surface (bgs). All three soil borings will be advanced using a drill rig equipped with hollow-stem augers. Soil samples will be collected in each boring at five-foot depth intervals for geologic logging, field screening purposes, and for chemical testing. Soil samples collected for chemical testing will be analyzed for TPHg and TPHd by modified EPA Method 8015B and for the full list of volatile organic compounds (VOCs) by EPA Method 8260B. Upon reaching the proposed total depth, each soil boring will be completed as a groundwater monitoring well screened from approximately 130 to 150 feet bgs. The newly installed monitoring wells will be developed no sooner than 72 hours after well installation activities have been completed. Monitoring and sampling activities will be completed at the Site no sooner than 48 hours after the completion of well development activities. Groundwater samples will be submitted to analytical laboratory

and tested for TPHg and TPHd by modified EPA Method 8015B and for VOCs, including MTBE and TBA, by EPA Method 8260B. The top of casing and location of each new monitoring well will be surveyed by a state-licensed surveyor.

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

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.

Los Angeles Regional Board staff concurs with the Work Plan, provided the following conditions are met:

1. Los Angeles Regional Board staff concurs with the locations and advancement of the three proposed soil borings at the Site and completion of those soil borings as groundwater monitoring wells.
2. Soil samples shall be collected in all proposed borings at five-foot intervals beginning at five feet bgs, at changes in soil lithology, and at areas of obvious contamination for lithological logging, field screening, and chemical testing purposes. All soil samples collected must be field screened for petroleum hydrocarbons using either a Photoionization Detector (PID) or a Flame Ionization Detector (FID). Soil samples collected at five-foot intervals in each boring must be collected and preserved in accordance with EPA Method 5035 and submitted to an analytical laboratory for chemical testing.
3. 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 <https://archive.org/details/protectwellst7490calirich/page/n111/mode/2up>). Borings not completed as groundwater monitoring wells must be properly sealed per Section 23 of the California Well Standard.
4. The professional in responsible charge shall review the borings logs and assume responsibility for their accuracy and completeness.
5. All groundwater monitoring wells must be surveyed to a benchmark for known elevation above mean sea level by a California-licensed land surveyor.
6. The Responsible Parties are required to submit a technical report detailing the results of the well installation activities to the Los Angeles Regional Board by **December 7, 2020**. The report must include, at a minimum, a scaled site map, soil boring logs, soil analytical results, a summary of field activities, an evaluation of the data, and recommendations. Based on the data, additional site investigation activities may be required.

### **Groundwater Monitoring Requirement (CCR, Title 23, Chapter 16, §2725)**

Following completion of the installation and development of groundwater monitoring wells at the Site, the Responsible Parties are required to commence a semi-annual groundwater monitoring program at the Site and must meet the following requirements:

7. All new and existing groundwater monitoring wells associated with the Site must be monitored. Groundwater monitoring and submission of semi-annual monitoring reports shall be conducted according to the following schedule:

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

The semi-annual groundwater monitoring report for the reporting period of July 2020 through December 2020 is due to the Los Angeles Regional Board by **January 15, 2021**.

### **General Requirements**

8. Soil and groundwater samples must be analyzed by Cal-LUFT GC/FID or Cal-LUFT GC/MS Method for TPHg and TPHd, and by EPA Method 8260B for benzene, toluene, ethylbenzene, and xylenes (BTEX), naphthalene, and fuel oxygenate compounds including MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and TBA. Sampling for ethanol is also required and shall be analyzed by either method above. If 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](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.
9. Analytical data reported for environmental samples collected during investigations related to the Site must be reported with the lowest possible reporting and method detection limits. If the test result is non-detect above the detection limit, the reporting format of “< MDL number” must be implemented.
10. 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.

11. The Responsible Parties are required to obtain all necessary permits from the appropriate agencies and make all required notifications prior to the start of work.
12. Please provide Los Angeles Regional Board staff a minimum of **10 days** advance notice by email ([jamesw.ryan@waterboards.ca.gov](mailto: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 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](mailto:weixing.tong@waterboards.ca.gov), or Mr. James W. Ryan IV at (213) 576-6711 or at [jamesw.ryan@waterboards.ca.gov](mailto:jamesw.ryan@waterboards.ca.gov).**

Sincerely,

Renee Purdy  
Executive Officer

cc: Ric Roda, State Water Resources Control Board, Division of Drinking Water  
Joe Liles, 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