DIVISION OF WATER QUALITY RESPONSE TO COMMENTS ON THE PROPOSED UST CASE CLOSURE OF CONOCOPHILLIPS COMPANY NO. 256150, 2330 EAST SLAUSON AVENUE, HUNTINGTON PARK (SITE)

We received one comment letter during the public comment period, which ended on May 23, 2014 at noon. The comments and our responses are presented here.

Comment letter received:

1. Mr. Toby B. Moore (Mr. Moore) of the Golden State Water Company (GSWC)

   Note: These comments were discussed with Mr. Moore during a telephone conversation on May 28, 2014.

COMMENT 1: Mr. Moore states that several reports documenting investigation/remediation activities at the Site between 1993 and 2009 were not available on the State Water Resources Control Board (State Water Board)'s GeoTracker related to the Site.

RESPONSE: On the telephone conversation with Mr. Moore on May 28, 2014, the State Water Board staff explained to Mr. Moore that an old environmental case for the Site was opened in 1993 when petroleum constituents were discovered during the underground storage tanks (USTs), fuel dispenser, and product piping excavation. Remedial activities including soil vapor extraction and excavation had been conducted at the Site. Mr. Moore was correct that several reports for this case were not available on GeoTracker since this case was closed in 1996 by the Los Angeles Regional Water Quality Control Board. It was determined that no further corrective action was required; therefore, these reports were never needed or considered relevant.

COMMENT 2: Mr. Moore states that the GSWC owns and operates two public water supply wells within approximately one-mile radius of the Site. Mr. Moore states that the information available on the vertical extent of the contamination from the Site appears to be limited to the vadose zone. Mr. Moore states that it is not clear whether impacts to the groundwater have been evaluated at the Site, for example via collection of groundwater samples, and that it is unclear as whether the UST release at the Site may have potentially impacted the aquifers used as a source of drinking water.

RESPONSE: Historical soil data indicate that petroleum constituents have mostly been non-detect. The most recent soil data obtained from the subsurface investigation in 2010 indicates that insignificant concentrations of petroleum constituents were detected in the low permeable soil between 51 to 66 feet below ground surface (bgs) directly beneath the tank pit and dispenser islands. Petroleum constituents were non-detect in soil between 71 feet bgs to the maximum explored depth of approximately 101 feet bgs.

Groundwater has not been encountered at the Site to a maximum explored depth of approximately 101 feet bgs. Estimated depth to the groundwater is approximately 130 feet bgs near the Site.

Mr. Moore was correct that groundwater samples were not collected at the Site. However, as discussed above, residual petroleum constituents are limited, localized, and not considered leachable to the groundwater. Even in the unlikely case that the groundwater was impacted, petroleum constituents in the groundwater will naturally attenuate through processes of

adsorption, dispersion, dilution, volatilization, and biological degradation. The likelihood of petroleum constituents affecting any sensitive receptors is very low. The GSWC wells are located greater than 4,000 feet from the Site. The uppermost perforations in GSWC wells occur at 296 and 600 feet bgs. Due to a great distance from GSWC wells to the Site, it is highly unlikely that residual petroleum constituents would impact GSWC wells.

Site conditions satisfy all eight general criteria, groundwater-specific criteria, vapor intrusion to indoor air criteria, and direct contact and outdoor air exposure criteria set forth in the Low-Threat UST Case Closure Policy. Therefore, case closure is appropriate.

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