UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: State Water Resources Control Board (State Water Board)	Address: 1001 I Street, P.O. Box 2231 Sacramento, CA 95812
Agency Caseworker: Matt Cohen	Case No.: N/A

Former Agency Name: Los Angeles Fire Department (LAFD) (Prior to 7/1/2013)	Address: 200 North Main Street, Suite 1780 Los Angeles, CA 90012
Former Agency Caseworker: Eloy Luna	Case No.: TT

Case Information

USTCF Claim No.: None	Global ID: T10000005048
Site Name: Sprouts Market	Site Address: 1751 Westwood Blvd. West Hollywood, CA 90024 (Site)
Responsible Party: KCB Management. LLC Attention: Mr. Peter Knell	Address: 117 East Colorado Boulevard Suite 400 Pasadena, CA 91105
USTCF Expenditures to Date: None	Number of Years Case Open: 2

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000005048

Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This Case does **NOT** satisfy **GENERAL CRITERIA b** of the Policy, which requires the unauthorized release to consist only of petroleum. This Site meets all of the required criteria of the State Water Resources Control Board Resolution 92-49. A summary evaluation of compliance with the Resolution 92-49 is shown in **Attachment 1: Compliance with State Water Board Policies and State Law.** The Conceptual Site Model (CSM) upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Site Information.** Highlights of the CSM upon which the evaluation of the Case has been made are as follows:

The Site currently exists as a grocery store with above-grade and below-grade parking and is surrounded by commercial and residential land use. An automotive fueling facility and repair shop reportedly existed at the Site between 1949 and 1962.

The release at this Site was discovered in June 2012 during a soil and grab groundwater investigation performed near the three former USTs and former waste oil UST. Laboratory analyses for petroleum

constituents and volatile organic compounds (VOCs) indicated that concentrations of benzene and tetrachloroethylene (PCE) in groundwater were slightly above water quality objectives (WQOs). A subsequent grab groundwater investigation was performed in April 2013 in an area inferred to be downgradient of the Site. Neither petroleum constituents nor VOCs were reported in groundwater above WQOs during the April 2013 investigation.

The USTs and surrounding soil were likely removed during the excavation of soil and construction of the subgrade parking garage. Low concentrations of petroleum and PCE in soil and groundwater appear to be limited to the parking area. Corrective actions have been implemented and additional assessment would be unnecessary and will not likely change the CSM. Any remaining petroleum constituents or VOCs do not pose significant risk to human health, safety, or the environment under current conditions.

Objections to Closure

The LAFD did not object to case closure (lead agency prior to July 1, 2013).

Recommendation for Closure

The corrective action performed at this Site ensures the protection of human health, safety, the environment and is consistent with chapter 6.7 of the Health and Safety Code and implementing regulations, applicable state policies for water quality control and the applicable water quality control plan, and case closure is recommended.

Prepared By: _____ 4/14/2014
Benjamin Heningburg, PG No. 8130 Date
Senior Engineering Geologist

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW
The Site complies with State Water Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the Site do not pose significant risk to human health, safety, or the environment.

The Site complies with the requirements of Resolution 92-49 as described below.

Will corrective action performed ensure the protection of human health, safety, and the environment? The information included in this UST Case Closure Summary supports a determination that corrective action performed at this Site will ensure the protection of human health, safety, and the environment.	☒ Yes ☐ No
Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST case closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this Site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this Site meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.	☒ Yes ☐ No
Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this Site?	☐ Yes ☒ No
If so, was the corrective action performed consistent with any order?	☐ Yes ☐ No☒ NA
Are corrective action and UST case closure consistent with State Water Board Resolution 92-49?	☒ Yes ☐ No
Is achieving background water quality feasible? To remove all traces of residual petroleum constituents at the Site would require significant effort and cost. Removal of all traces of residual petroleum hydrocarbon constituents (if present) that contribute to detectable concentrations in shallow groundwater can be accomplished, but would require excavation of additional soil as well as additional remediation of shallow groundwater. If complete removal of all detectable traces of petroleum constituents becomes the standard for UST corrective actions, the statewide technical and economic implications will be enormous. Because of the high costs involved and minimal benefit of attaining further reductions in concentrations of petroleum constituents at this Site, and the fact that beneficial uses are not threatened, attaining background water quality at this Site is not feasible.	☐ Yes ☒ No

If achieving background water quality is not feasible: **Is the alternative cleanup level consistent with the maximum benefit to the people of the State?** It is impossible to determine the precise level of water quality that will be attained given the uncertainties about the rates of dissolution and degradation. In light of all the factors discussed above and the fact that the residual petroleum constituents will not unreasonably affect present and anticipated beneficial uses of groundwater, an acceptable level of water quality will be attained that is consistent with the maximum benefit to the people of the state.	☒ Yes ☐ No
Will the alternative cleanup level unreasonably affect present and anticipated beneficial uses of water? Remaining concentrations in shallow groundwater beneath the Site are near WQOs.	☐ Yes ☒ No
Will the alternative level of water quality result in water quality less than that prescribed in applicable Basin Plan? The final step in determining whether cleanup to a level of water quality less stringent than background is appropriate for this Site requires a determination that the alternative level of water quality will not result in water quality less than that prescribed in the relevant basin plan. Pursuant to State Water Board Resolution 92-49, a site may be closed if the basin plan requirements will be met within a reasonable time frame.	☐ Yes ☒ No
Have factors contained in title 23 of the California Code of Regulations, section 2550.4 been considered? In approving an alternative level of water quality less stringent than background, the State Water Board considers the factors contained in California Code of Regulations, title 23, section 2550.4, subdivision (d). The adverse effect on shallow groundwater will be minimal and localized, and there will be little adverse effect on the groundwater contained in deeper aquifers, given the physical and chemical characteristics of petroleum constituents, the hydrogeological characteristics of the Site and surrounding land. In addition, the potential for adverse effects on beneficial uses of groundwater is low, in light of the proximity of the groundwater supply wells, the current and potential future uses of groundwater in the area, the existing quality of groundwater, the potential for health risks caused by human exposure, the potential damage to wildlife, crops, vegetation, and physical structures, and the persistence and permanence of potential effects. Finally, a level of water quality less stringent than background is unlikely to have any impact on surface water quality, in light of the volume and physical and chemical characteristics of petroleum constituents; the hydrogeological characteristics of the Site and surrounding land; the quantity and quality of groundwater and direction of groundwater flow, the patterns of precipitation in the region, and the proximity of residual petroleum to surface waters.	☒ Yes ☐ No

Will the requisite level of water quality be met within a reasonable time? Although WQOs may not have been met at the Site, the approximate time period in which the requisite level of water quality will be met for constituents of concern is decades to hundreds of years. This is a reasonable period in which to meet the requisite level of water quality because current and future beneficial uses are not impaired. Impacted groundwater is not currently being used as a source of drinking water and it is highly unlikely that impacted groundwater will be used as a source of drinking water in the future. Residential and commercial water users are currently connected to public supply wells. Public supply wells are constructed with competent sanitary seals and intake screens that are in deeper more protected aquifers. The site conditions do not represent a substantial threat to human health, safety, or the environment, and case closure is appropriate.	☒ Yes ☐ No

ATTACHMENT 2: SUMMARY OF BASIC INFORMATION (Conceptual Site Model)

Site Location/ History

- Location: The Site is located on the southern corner of the intersection of Westwood Boulevard and Massachusetts Avenue in West Hollywood. The Site currently exists as a grocery store with above-grade and below-grade parking and is surrounded by commercial and residential land use. An automotive fueling facility and repair shop reportedly existed at the Site between 1949 and 1962. No known USTs are currently on-Site.
- Nature of Contaminants of Concern: Petroleum constituents and PCE.
- Primary Source of Release: UST system.
- Discovery Date: July 2012.
- Release Type: Petroleum[1] and chlorinated solvents.
- Free Product: Not reported.

Table A: USTs

Tank	Size in Gallons	Contents	Status	Date
1	Unknown	Gasoline	Removed	Unknown
2	Unknown	Gasoline	Removed	Unknown
3	Unknown	Gasoline	Removed	Unknown
4	Unknown	Waste Oil	Removed	Unknown

Receptors

- Groundwater Basin: Coastal Plain of Los Angeles – Santa Monica (4-11.01).
- Groundwater Beneficial Uses: Municipal (MUN), Agricultural Supply (AGR), Industrial Supply (IND), and Industrial Process Supply (PRO).
- Designated Land Use: Commercial, Residential.
- Public Water System: Los Angeles Department of Water and Power.
- Distance to Nearest Supply Wells: Approximately 8,800 feet west-southwest of the Site..
- Distance to Nearest Surface Waters: Approximately 4.5 miles west of the Site.

Geology/ Hydrogeology

- Average Groundwater Depth: Approximately 5 feet.
- Minimum Groundwater Depth: Approximately 3 feet.
- Geology: Clay from the surface to approximately 7.5 feet, sand from approximately 7.5 to 10 feet below ground surface, the maximum depth explored..
- Hydrogeology: Unconfined. No monitoring wells have been installed on-Site. The inferred direction of groundwater flow is to the south-southeast based on hydrogeologic data from the former LUFT case (Mobil 18-FID, Global ID T0603700686) located approximately 500 feet southeast of the Site.

[1] "Petroleum" means crude oil, or any fraction thereof, which is liquid at standard conditions of temperature and pressure, which means at 60 degrees Fahrenheit and 14.7 pounds per square inch absolute.
(Health & Safety Code, § 25299.22.)

Corrective Actions

- All USTs were reportedly removed prior to the construction of the subgrade parking garage. Soil surrounding the USTs was likely over-excavated during construction.

Table B: Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 ft. bgs (mg/kg)	Maximum 5-10 ft. bgs (mg/kg)
Benzene	<0.001	Not Analyzed
Ethylbenzene	<0.001	Not Analyzed
Naphthalene*	Not Analyzed	Not Analyzed
PAHs**	Not Analyzed	Not Analyzed

* There are no soil samples results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2% benzene and 0.25% naphthalene. Therefore, benzene concentrations can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Table 1 of the Policy. Therefore, estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact with a safety factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

**Poly-aromatic hydrocarbons as benzo(a)pyrene toxicity equivalent.

Table C: Grab Groundwater Sampling Results

Well No.	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Total Xylenes (µg/L)	MTBE (µg/L)	PCE (µg/L)	Naphthalene (µg/L)
SB-3	<200	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
SB-4	1,600	0.8	<0.5	43	30	<0.5	3.4	9.6
SB-5	5,000	**4.6**	<0.5	165	27	<0.5	<0.5	12
SB-6	200	**1.9**	4.6	1.1	<0.5	<0.5	**7.4**	8.7
SB-7	<200	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
SB-8	<200	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
HP-1	Not Analyzed	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
HP-2	Not Analyzed	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
HP-3	Not Analyzed	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
HP-4	Not Analyzed	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
WQOs		**1.0**	**150**	**300**	**1,750**	**5.0**	**5.0**	

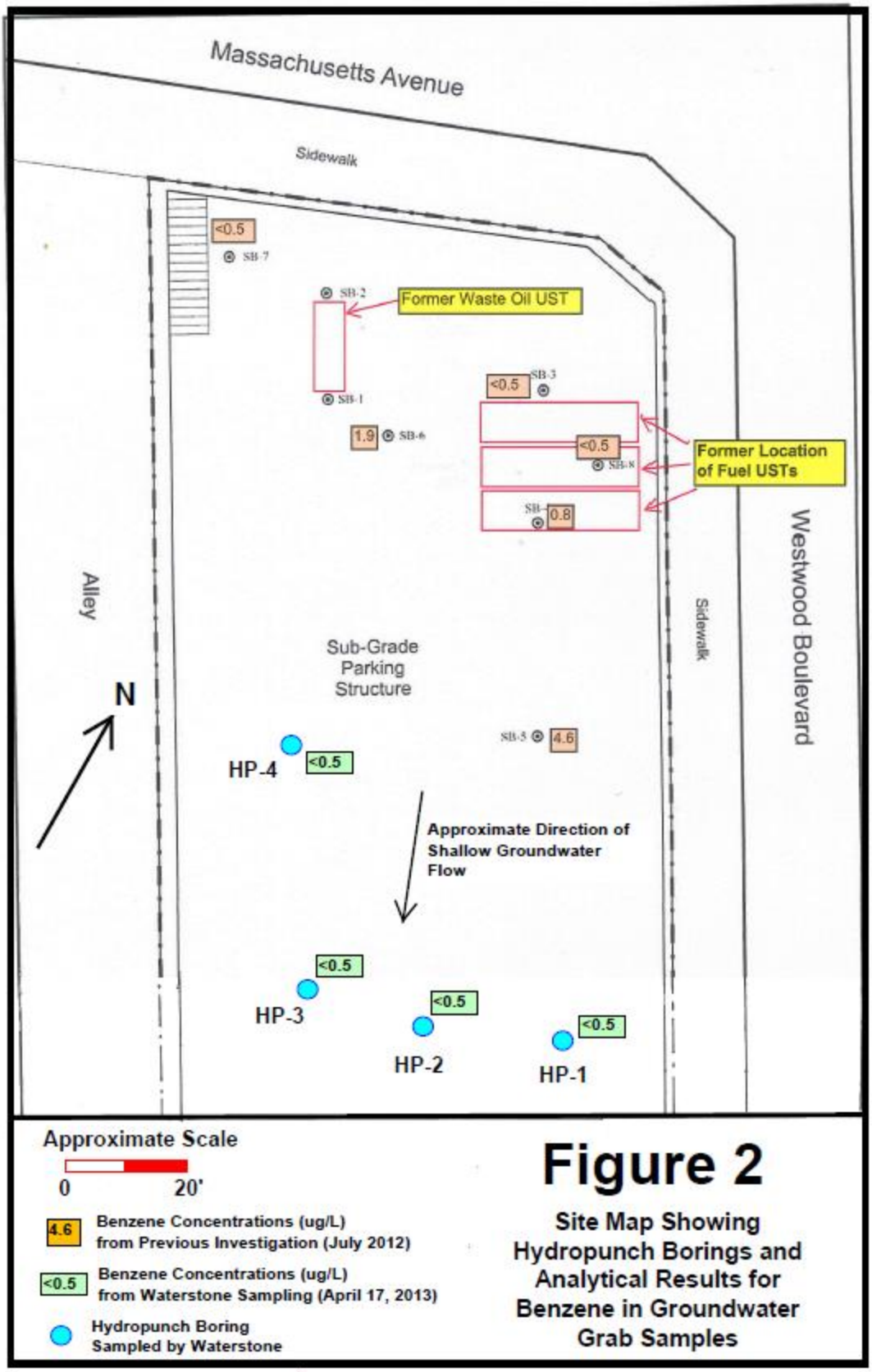
Notes
Chemical constituents listed above consist of Total Petroleum Hydrocarbons (TPH) quantified as gasoline (TPHg), benzene, toluene, ethylbenzene, total xylenes, methyl tert-Butyl ether (MTBE), tetrachloroethylene (PCE), and naphthalene. Reported concentrations that exceed WQOs are shown in bold.
"<" = Less than the laboratory method reporting limit.

Groundwater Trends
Due to the removal of the primary and secondary source removal, age of the release, and low residual concentrations of petroleum and chlorinated solvent contamination remaining in soil and groundwater, groundwater concentration trends are likely stable to decreasing with time.

Evaluation of Risk Criteria

- Maximum Petroleum Constituent Plume Length above WQOs: The groundwater plume is approximately 75 feet in length.
- Petroleum Constituent Plume Determined Stable or Decreasing: Yes
- Soil/Groundwater Sampled for MTBE: Yes, see Table C above
- Residual Petroleum Constituents Pose Significant Risk to the Environment: No
- Residual Petroleum Constituents Pose Significant Vapor Intrusion Risk to Human Health: No – Petroleum constituents most likely to pose a threat for vapor intrusion were removed during soil excavation and over-excavation. Site conditions demonstrate that the residual petroleum constituents in soil and groundwater are protective of human health.
- Residual Petroleum Constituents Pose a Nuisance[2] at the Site: No
- Residual Petroleum Constituents in Soil Pose Significant Direct Contact and Outdoor Air Exposure to Human Health Risk of Adversely Affecting Human Health: No.
- Residual Chlorinated Solvents in Soil Pose Significant Direct Contact and Outdoor Air Exposure to Human Health: No – Soil data does not indicate chlorinated solvent constituents in soil at concentration that may indicate a health concern.
- Chlorinated Solvents in Groundwater Pose Risk to Human Health: No – Only one grab groundwater sample contained PCE at a concentration that slightly exceeded WQOs. This sample was collected in 2012; it is likely this concentration has reduced through natural attenuation at the Site.
- Chlorinated Solvents Pose Significant Vapor Intrusion Risk to Human Health: No – The concentration of PCE is two orders of magnitude lower than the San Francisco Bay Regional Water Quality Control Board 2013 Tier 1 Environmental Screening Levels for Vapor Intrusion to Indoor Air from groundwater criteria of 210 µg/L.

[2] Nuisance as defined in California Water Code, section 13050, subdivision (m).



Source: Excerpted from "Site Assessment Report and Request for No Further Action at Property Located at 1751 Westwood Boulevard, Los Angeles, CA", by Waterstone Environmental, Inc. dated May 1, 2013.