

Los Angeles Regional Water Quality Control Board

June 9, 2022

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7021 0950 0000 2489 9312

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7021 0950 0000 2489 9329

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.: 7021 0950 0000 2489 9336

UNDERGROUND STORAGE TANK PROGRAM – SITE ASSESSMENT 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 (Regional Water Board), is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within Los Angeles and Ventura Counties. As such, the Regional Water 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 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.

Regional Water Board staff has reviewed the document titled "Semiannual Groundwater Monitoring Report, Third and Fourth Quarter 2021 (1 July 2021 through 31 December 2021)" dated January 13, 2022, prepared by ETIC, on behalf of ExxonMobil Oil Corporation. Regional Water Board staff has also reviewed other information in our case file for the Site.

Review of Site Assessment Report

In December 2021, ETIC completed groundwater monitoring activities at the Site. Groundwater levels during the event ranged between 133.15 and 135.84 feet below top of casing and groundwater flow was to the east-northeast. Laboratory data for the groundwater samples collected during the event indicated maximum concentrations of total petroleum hydrocarbons (TPH) as gasoline (TPHg) of 9,900 micrograms per liter ($\mu\text{g/L}$), TPH as diesel (TPHd) of 1,000 $\mu\text{g/L}$, benzene of 700 $\mu\text{g/L}$, toluene of 160 $\mu\text{g/L}$, ethylbenzene of 1,100 $\mu\text{g/L}$, total xylenes of 3,000 $\mu\text{g/L}$, methyl tertiary butyl ether (MTBE) of 340 $\mu\text{g/L}$, tertiary butyl alcohol (TBA) of 620 $\mu\text{g/L}$, naphthalene of 140 $\mu\text{g/L}$, 1,2-dichloroethane of 1.5 $\mu\text{g/L}$, isopropylbenzene of 38 $\mu\text{g/L}$, n-butylbenzene of 52 $\mu\text{g/L}$, n-propylbenzene of 110 $\mu\text{g/L}$, p-isopropyltoluene of 13 $\mu\text{g/L}$, tetrachloroethene (PCE) of 4.5 $\mu\text{g/L}$, trichloroethene (TCE) of 3.7 $\mu\text{g/L}$, cis-1,2-dichloroethene of 6.4 $\mu\text{g/L}$, 1,2,4-trimethylbenzene of 1,200 $\mu\text{g/L}$, and 1,3,5-trimethylbenzene of 370 $\mu\text{g/L}$. Groundwater samples collected from well MW-2, which is the current downgradient well at the Site, has the highest concentrations of TPHg, TPHd, benzene, toluene, ethylbenzene, total xylene, MTBE, and TBA out of the three wells monitored at the Site.

Work Plan Requirement (per CCR, Title 23, Chapter 16, §2724)

To evaluate the extent of contamination from releases originating at the Site, the Responsible Parties are required to submit a site assessment work plan to the Regional Water Board. The work plan shall propose soil borings and monitoring well installations sufficient to delineate and assess the extent of soil and groundwater impacts. The work plan is due to the Regional Water Board by **July 15, 2022**.

Continuous Groundwater Monitoring (per CCR, Title 23, Chapter 16, §2725)

The Responsible Parties are required to continue a semiannual groundwater monitoring program at the Site and must meet the following requirements:

1. All existing groundwater monitoring wells associated with the Site must be monitored.
2. Groundwater monitoring and submission of semiannual 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

3. The semiannual groundwater monitoring report for the reporting period of January 2022 through June 2022 is due to the Regional Water Board by **July 15, 2022.**

General Requirements

4. Groundwater samples must be analyzed for TPHg, TPHd when diesel is identified at the Site, and for benzene, toluene, ethylbenzene, and xylenes (BTEX), naphthalene, fuel oxygenate compounds including MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), TBA, and ethanol. For a waste oil tank, the full suite of aromatic and chlorinated analytes must be tested per Environmental Protection Agency (EPA) Method 8260B, and polynuclear aromatic hydrocarbons (PAHs) must also be tested per EPA Method 8270C. The analytical methods and respective detection limits must conform to the Regional Water Board General Laboratory Testing Guidance (3/2021) (https://www.waterboards.ca.gov/losangeles/publications_forms/forms/ust/lab_forms/USTLabupdate3-2021_ADA.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.
5. 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.
6. Prior to consideration of case closure, the Responsible Parties must analyze at least one round of groundwater samples including the full suite of aromatic and chlorinated volatile organic compounds per EPA Method 8260B.
7. 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.

8. 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.
9. Please provide Regional Water 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 Water 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 Water 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 Regional Water 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 Regional Water Board pursuant to California Water Code (CWC) sections 13323 through 13328. The Regional Water Board may also request that the Attorney General seek judicial civil liabilities or injunctive relief pursuant to CWC sections 13264, 13304, and 13340. The Regional Water Board reserves its rights to take any further enforcement action authorized by law.

Exxon Mobil Corporation, Hanukah, Inc., - 5 -
Petroleum Management & Marketing
25808 S. Narbonne Ave., Lomita

June 9, 2022

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: Milagros Alora, State Water Resources Control Board, Division of Drinking Water
Dmitriy Ginzburg, State Water Resources Control Board, Division of Drinking Water
Tim Smith, Los Angeles County Department of Public Works, Environmental
Program Division
Carla Dillon, City of Lomita, Department of Public Works
Joe Liles, Water Replenishment District of Southern California
Zachary Spahn, ETIC