





City of Carson Report to Mayor and City Council

December 18, 2012
Unfinished Business

**SUBJECT: UPDATE ON ENVIRONMENTAL INVESTIGATION OF THE CAROUSEL TRACT
(FORMER KAST PROPERTY SITE)**


Submitted by Clifford W. Graves
Director of Community Development


Approved by David C. Biggs
City Manager

I. SUMMARY

This report is an update on the environmental investigation of the Carousel Tract.

II. RECOMMENDATION

RECEIVE and FILE.

III. ALTERNATIVES

TAKE another action the City Council deems appropriate.

IV. BACKGROUND

The City Council was last updated on the status of the environmental investigation on November 20, 2012 (Exhibit No. 1). Below is an update of activities since November 20, 2012.

Excavation Pilot Tests

Excavation pilot tests officially began on November 5, 2012, and are scheduled to be completed for all six properties by early next year depending on access.

Excavation pilot test activities have been completed for one site, and a draft analysis is currently being prepared by URS to submit for Regional Board review. URS began remedial excavation pilot test activities for a second site on December 3, 2012, and is scheduled to complete activities by December 21, 2012. Representatives for the residents have expressed concerns regarding odors and other nuisance conditions associated with the excavation activities. The Regional Board forwarded these concerns and addressed the excavation process in a letter dated November 21, 2012 (Exhibit No. 2). The Regional Board has confirmed excavation activities will not be scheduled during the holiday season.

Through the implementation of the *Pilot Test Work Plan*, URS/Shell is required by the City to mail out notices for all pilot test activities and schedules within 10 days of planned activities. All notices have been mailed out within 10 days of scheduled activities and to property owners/residents within a 300-foot radius and to those who requested notices.

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Expert Panel

Earlier this year, the Regional Board considered establishing an expert panel to assist in the process of identifying remedial actions and clean-up goals for the Carousel neighborhood (Kast property). The Regional Board anticipates having three academic experts and one communication specialist participating in the expert panel.

The Regional Board has not yet completed selection of the expert panel, and the contract is still under review. The City will be advised when the panel is formally established by the Regional Board.

AT&T Trench Excavation Issues

The Regional Board approved the *Work Plan for Delineation of Tar-Like Material in the Vicinity of AT&T Excavations near Intersection of East 244th Street and Marbella Avenue* (Work Plan) for the Carousel Tract on October 18, 2012 (Exhibit No. 3).

Clean-up for the areas where the black tar-like material was observed, during the AT&T excavation work to install new telephone cable, has been completed as directed by the Work Plan. The clean-up included removal and delineating the extent of the tar-like material. The clean-up also included removal of a section of the sidewalk in front of the driveway at 311 East 244th Street to delineate and remove the material.

The delineation did not require URS to cross onto private property. A complete final report detailing the clean-up and extent of material removed will be submitted to the Regional Board in January 2013, according to the Work Plan. The final report will include the laboratory results, interpretations, conclusions, and, if warranted, a plan for additional clean-up or abatement of the waste.

Community Outreach

During the November 20, 2012 (minutes unavailable), City Council meeting, Councilmember Gipson requested that staff research possible methods to enhance community outreach efforts. The Council requested that staff explain current opportunities for the community to obtain information related to the Carousel investigation in addition to additional steps that the City can utilize to provide direct information to the public.

Currently, the Regional Board provides all documents (including studies, reports, and sample analysis) related to the Carousel Tract investigation on the Geotracker website. City staff also provides all City Council Reports, letters to residents, meeting minutes, questions and answers, notices for pilot test activities, status of activities, locations for pilot test activities, etc., on the City's webpage dedicated to

the Carousel Tract investigation. Contact information for City staff and the Regional Board are also made available on the website.

In addition to the information available on the internet, the Regional Board emails all documents to stakeholders and to any interested party/person who has requested to be included on the mailing list.

As stated above, the *Pilot Test Work Plan* states that the City requires URS/Shell to mail out notices to all property owners/residents within a 300-foot radius whenever any work plan activities are conducted at least 10 days prior to the start date.

As noted above, there are significant resources for gaining information if a resident or interested party wishes to look at past or current documents. Staff has explored additional measures that may be beneficial as follows:

Bulletin Board: Place a bulletin board/sign located at the entrance of the Carousel Tract advising of the various opportunities for viewing or receiving public information on the Carousel investigation. Information will be provided regarding websites and contact information.

Online Subscription: Create a subscription service on the City's Carousel Tract webpage where letters or documents sent to City staff from the Regional Board will be directly forwarded to those who subscribe.

Staff is currently working with the Information Services Division to determine the capability and timing of providing a subscription service. Staff will advise the City Council of the status during the next update. Staff has also requested that the Executive Director of the Regional Board, Mr. Sam Unger, provide a presentation to the City Council in early 2013. Mr. Unger has expressed an interest in providing such an update.

V. FISCAL IMPACT

None.

VI. EXHIBITS

1. City Council Staff Report: September 18, 2012, and November 20, 2012, without exhibits. (pgs. 5-13)
2. RWQCB Excavation Activities Letter: November 21, 2012. (pgs. 14-17)
3. RWQCB Approval of Work Plan letter: October 18, 2012. (pgs. 18-21)

Prepared by: Sharon Song, AICP Associate Planner

Reviewed by:

City Clerk	City Treasurer
Administrative Services	Public Works
Community Development	Community Services

Action taken by City Council	
Date _____	Action _____

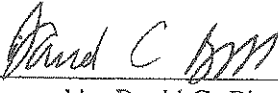


City of Carson Report to Mayor and City Council

November 20, 2012
Unfinished Business

**SUBJECT: UPDATE ON ENVIRONMENTAL INVESTIGATION OF THE CAROUSEL TRACT
(FORMER KAST PROPERTY SITE) AND MONTEREY PINES**


Submitted by Clifford W. Graves
Director of Community Development


Approved by David C. Biggs
City Manager

I. SUMMARY

This report is an update on the environmental investigation of the Carousel Tract and the recently initiated United States Environmental Protection Agency (US EPA) investigation at Monterey Pines.

II. RECOMMENDATION

RECEIVE and FILE.

III. ALTERNATIVES

TAKE another action the City Council deems appropriate.

IV. BACKGROUND

Carousel Tract

The City Council was last updated on the status of the environmental investigation on September 18, 2012 (Exhibit No. 1). To date, indoor air testing of residences in the Carousel Tract shows no intrusion from vapors in the soil into the residences. Hydrocarbon vapors and methane are present below the surface. Shell Oil is conducting pilot tests of several remediation technologies including oxidation, bioventing and excavation. Below is an update of activities since September 18, 2012.

Bioventing Pilot Tests/Excavation Pilot Tests

The bioventing pilot tests have been completed for all six properties. Results of the pilot test have been submitted to the Regional Water Quality Control Board (Regional Board) and are under review.

The excavation pilot tests officially began on November 5, 2012, and are scheduled to be completed for all six properties by early next year, depending on access. Currently, one out of the six chosen properties is undergoing the excavation pilot test. One out of the original six chosen properties will be replaced with an alternate location due to access issues.

EXHIBIT NO. 1-



Once the excavation pilot tests are completed early next year, Shell Oil will be required to submit a pilot testing report, Remedial Action Plan (RAP), and clean-up goals. The RAP will refer to the results of the pilot tests to propose the types of remedial action that will be appropriate for the Carousel Tract. The RAP will be made available for public comments for residents and property owners to provide input on the proposed clean-up methods. The Regional Board will also consider input from an expert panel, currently in process of formation, in addition to comments from the City and other community stakeholders.

Expert Panel

Earlier this year, the Regional Board considered establishing an expert panel to assist in the process of identifying remedial actions and clean-up goals for the Carousel neighborhood (Kast Property). Working with the Center for Sustainable Cities, and Sol Price School of Public Policy at the University of Southern California, efforts are progressing on the selection of the expert panel. The Center for Sustainable Cities will coordinate the activities of the expert panel. At the request of the Regional Board, Shell Oil is voluntarily providing funding for the expert panel. A contract with the Center for Sustainable Cities should be executed in the near future.

There will be three academic experts and one communication specialist participating in the expert panel. Regional Board staff indicates that three of the panelists have been identified and that the fourth expert will have expertise in human health impacts. The panelists are identified as follows:

Arturo A. Keller, Ph.D., Bren School of Environmental Science and Management, University of California at Santa Barbara.

Arturo A. Keller is Professor of Environmental Biogeochemistry at the graduate-level Bren School of Environmental Science & Management, University of California, Santa Barbara. His research and teaching interests focus on water quality management at the watershed level and the fate and transport of pollutants in the environment.

J.R. DeShazo, Ph.D., Luskin Center Director, Professor of Public Policy and Urban Planning, University of California at Los Angeles.

J.R. DeShazo is the Director of the Luskin Center for Innovation at the University of California at Los Angeles. He also is a Professor and Vice-Chair of the Department of Public Policy in the Luskin School of Public Affairs at UCLA, where he is an expert in economics, public finance, and organizational governance.



Maria Elena Kennedy, Kennedy Communications, Inc.

Ms. Kennedy is President of Kennedy Communications, a public relations firm which specializes in water resources, transportation and environmental consulting.

The expert panel will develop a final report with recommendations to the Regional Board regarding the proposed Remedial Action Plan, including proposed clean-up goals. The expert panel will submit to the Regional Board monthly statements documenting activities and progress, quarterly progress reports for the first year, a final report, and will also make a presentation to the public and the Regional Board. The expert panel is expected to complete the process within a 12- to 24- month period.

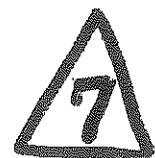
AT&T Trench Excavation Issues

The Regional Board approved the *Work Plan for Delineation of Tar-like material in the Vicinity of AT&T Excavations near Intersection of East 244th Street and Marbella Avenue* (Work Plan) for the Carousel tract on October 18, 2012 (Exhibit No. 2). The Regional Board staff reviewed the results of the samples of the black tarry material found during the AT&T excavation work to install new telephone cable and concluded that the material is of petroleum hydrocarbon compounds; however, the material did not contain harmful vapors/volatile organic compounds (VOCs).

The clean-up for the areas where the black tar-like material was observed will begin mid-November and will take approximately three (3) days, depending on the boundaries/extent of the tar-like material. After a full clean-up is completed, Shell Oil will be required to submit a final report, including laboratory results, interpretations, conclusions, and if warranted, a plan for additional clean-up or abatement of the waste.

Monterey Pines

Prior to the development of the Monterey Pines neighborhood, the property had completed remedial activates and obtained a "no further action" determination from the Regional Board. During the Carousel tract investigation in 2010, Shell Oil was asked to provide an assessment of plume delineation for the Carousel Tract to determine potential impacts to properties outside the Carousel Tract and identified the need to conduct further investigation of Monterey Pines. During the investigation, Shell Oil identified contaminants within the private streets of Monterey Pines that were inconsistent and unrelated to those found in the Carousel Tract.



As a result of the findings, the Department of Toxic Substances Control (DTSC) was designated the lead agency to begin investigations for the Monterey Pines neighborhood. Since then, DTSC and the Regional Board have been unsuccessful in identifying a responsible party and have been unable to provide the resources to continue testing the site to fully delineate the source and definition of contamination beyond the private streets.

Due to their limited resources and absent a responsible party, on October 3, 2012, DTSC submitted a formal request to the US EPA to take over as lead agency for the investigation of the Monterey Pines neighborhood (Exhibit No. 3).

The request was immediately approved by US EPA and a *Sampling and Analysis Plan* has been approved to begin testing to delineate the contamination beneath Monterey Pines. Testing began on November 5, 2012. An informational fact sheet was mailed to Monterey Pine residents and property owners in October explaining their involvement and expected activities (Exhibit No. 4). Additional testing is expected in the neighboring area and at the Wilmington Middle School over the winter break.

Since only a few limited samples were conducted prior to US EPA's involvement, no determination on the source, level of contamination or need for remediation has been made. US EPA utilizes an expedited process and will have a determination regarding potential remediation activities by early next year. Additional information will be provided as the sampling plan is implemented and can be found at www.epaossc.org/montereypines.

V. FISCAL IMPACT

None.

VI. EXHIBITS

1. City Council Staff Report, September 18, 2012, without exhibits. (pgs. 6-9)
2. Approval of Work Plan letter, October 18, 2012. (pgs. 10-13)
3. Request from DTSC letter, October 3, 2012. (pgs. 14-16)
4. Fact Sheet. (pgs. 17-18)

Prepared by: Sharon Song, AICP Associate Planner

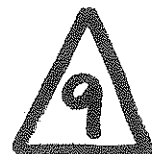


TO: Rev09-04-2012

Reviewed by:

City Clerk	City Treasurer
Administrative Services	Public Works
Community Development	Community Services

Action taken by City Council	
Date _____	Action _____






City of Carson Report to Mayor and City Council

September 18, 2012
Unfinished Business

**SUBJECT: UPDATE ON ENVIRONMENTAL INVESTIGATION OF THE CAROUSEL TRACT
(FORMER KAST PROPERTY SITE)**


Submitted by Clifford W. Graves
Director of Community Development


Approved by David C. Biggs
City Manager

I. SUMMARY

This report is an update on the environmental investigation of the Carousel Tract.

II. RECOMMENDATION

RECEIVE and FILE.

III. ALTERNATIVES

TAKE another action the City Council deems appropriate.

IV. BACKGROUND

City Council was last updated on the status of the environmental investigation on July 17, 2012 (Exhibit No. 1). Below is an update of activities since July 17, 2012:

Bioventing Pilot Tests

Access was obtained to conduct bioventing pilot tests as described in the approved Pilot Test Work Plan (Work Plan) at six selected residential properties through the property owner's counsel. Bioventing pilot tests at five properties were completed, and the one remaining property is scheduled to complete tests within the next few weeks. So far, two reports analyzing the test results have been submitted to the Regional Water Quality Control Board (Regional Board) for review. The reports determined that the results of the bioventing pilot tests were inconclusive. The Regional Board is waiting to review and evaluate all six reports in its entirety prior to making a determination.

On June 20, 2012, an informal meeting at 24512 Marbella Avenue was held by the Regional Board at the request of Carousel residents to discuss details of the bioventing equipment and generator. The bioventing test began the following Friday, June 22, 2012. During the initial bioventing test on July 6, 2012, and July 9, 2012, the Regional Board received several complaints from residents in regards to odors and fumes associated with the bioventing activities. The

September 18, 2012

Regional Board staff and the South Coast Air Quality Management District (AQMD) investigated the complaint and conducted a site inspection immediately after receiving the complaints. AQMD provided an inspection report and stated the bioventing equipment and/or generator were not causing odors or fumes and no violations were observed (Exhibit No. 2).

On July 12, 2012, Carousel residents attended a Regional Board meeting to provide testimony during oral communication. In response to the testimony provided, three Board members, including the Chair, visited the Carousel site to observe the ongoing investigation and bioventing equipment for noise and odor issues.

Methane Mitigation Plan

One property located at 378 149th Street will be subject to a *Methane Mitigation System Plan and Design* that was approved by the Los Angeles County Department of Public Works and Regional Board. The results of the sub-slab surface probe within the garage of the property exceeded threshold levels, requiring methane mitigation. No other probes within the property exceeded threshold levels, including indoors. Starting dates for methane mitigation are unknown at this time. The attorneys and homeowners were unable to schedule a time for mitigation and are currently in discussion.

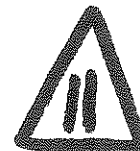
Excavation Pilot Tests

In accordance with the approved Work Plan, excavation pilot tests will be implemented for six properties. Grading permits for the excavation pilot tests have been reviewed and approved by the Planning Division and the Building and Safety Division. Depending on the time needed to obtain access authorization, excavation work is scheduled to begin in October, 2012.

Shell Oil submitted a request for a schedule extension to the Regional Board for the excavation pilot test portion of the Work Plan on July 5, 2012; however, the Regional Board denied the request but allowed for a temporary extension, pending the issuance of grading permits (Exhibit No. 3).

Seismic Refraction Survey Feasibility Test

Shell will be conducting a one-day seismic refraction survey feasibility test at four locations on the streets in the Carousel neighborhood on September 26, 2012. The purpose of the test is to evaluate whether the seismic refraction method can be used to detect and map buried concrete reservoir bases. The test will evaluate applicability of the method for larger scale implementation within the neighborhood.



AT&T Trench Excavation Issues

On August 28, 2012, AT&T's contractor, HCI, began excavation work at Marbella Avenue and East 244th Street to install new telephone cable. Regional Board staff and URS personnel (Shell Oil's consultant) were on site and observed the work as required by the Work Plan.

AT&T excavated four trenches that were approximately 2 feet by 4 feet in plain dimension and 3 feet deep. During this time, one of the trenches uncovered oozing tarry material that was highly viscous and coming out from the trench walls. The other three trenches had variably stained and odorous soil; however, the oozing tarry material was not present in the other trenches.

Air monitoring tests were completed by URS, and readings did not warrant immediate health concerns or exceed threshold levels. AT&T continued to complete their work, and URS documented the soil/tar material, took samples for analysis and pictures of the incident. The Regional Board required Shell to file an incident report and subsequently issued an order in accordance to the approved Clean-Up and Abatement Order (COA) to delineate the extent of the waste in the soil, develop a work plan to completely delineate the extent of the black and viscous material, and to propose a plan for cleanup or abatement of the waste. The Regional Board is requiring the work plan to be completed by October 12, 2012 (Exhibit No. 5).

Results of the samples taken of the black tarry material have been submitted for analysis and will be available in a few weeks. At this time, the Regional Board cannot confirm the nature of the material.

The incident above received media attention, and several local news stations reported the incident. In addition, on August 31, 2012, a group of residents and Robert Bowcock, an environmental consultant working on behalf of the residents, temporary halted AT&T from completing work due to concerns regarding the waste and potential safety issues. Both the Los Angeles County Sheriff and the Los Angeles County Fire Department were called to investigate. The Battalion Chief advised that testing and site observations confirmed that there was no immediate threat to public safety, and AT&T was able to perform appropriate activities to fill the trench. The Regional Board staff was present and instructed that activities were to continue to be performed pursuant to approved protocol. Additional information can be reviewed on the City's website and through a link to the Regional Water Quality Control Board website.

V. FISCAL IMPACT

None.



VI. EXHIBITS

- 1. City Council Staff Report dated July 17, 2012. (pgs. 5-7)
- 2. AQMD Report. (pgs. 8-9)
- 3. Extension letter from Regional Board dated July 6, 2012. (pgs. 10-16)
- 4. Seismic Refraction Notice. (pg. 17)
- 5. Directive letter for Clean-up dated September 10, 2012 (pgs. 18-20)

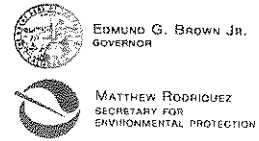
Prepared by: Sharon Song, AICP Associate Planner

TD:Rev09-01-2012

Reviewed by:

City Clerk	City Treasurer
Administrative Services	Public Works
Community Development	Community Services

Action taken by City Council	
Date _____	Action _____



Los Angeles Regional Water Quality Control Board

November 21, 2012

Mr. Eugene Freed
Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810

Subject: EXCAVATION PILOT TESTING AT THE CAROUSEL TRACT PURSUANT TO CALIFORNIA WATER CODE SECTION 13304 ORDER - FORMER KAST PROPERTY TANK FARM LOCATED SOUTHEAST OF THE INTERSECTION OF MARBELLA AVENUE AND EAST 244TH STREET, CARSON, CALIFORNIA (SCP NO. 1230, SITE ID 2040330, CAO NO. R4-2011-0046)

Dear Mr. Freed:

The Regional Water Quality Control Board, Los Angeles Region (Regional Board) understands that the field work for the first pilot excavation test at the Carousel Tract site has been completed and the second test is planned for early December 2012. These tests are being conducted to comply with the requirements of Cleanup and Abatement Order No. R4-2011-0046, issued by the Regional Board.

The purpose of the excavation pilot test is to remove petroleum hydrocarbon impacted soil and evaluate the effectiveness of various mitigation methods, including various applications of odor suppressants used to reduce and minimize objectionable odors to the best practical level. The goal of mitigation measures identified in the Mitigated Negative Declaration approved by the Regional Board under the California Environmental Quality Act is to assure mitigation of odors and other potential nuisance conditions in compliance with regulatory requirements.

Attached please find a copy of correspondence sent to the Regional Board from Mr. Robert Bowcock of Integrated Resource Management, Inc. (IRM) regarding the first pilot test conducted at 24612 Neptune Avenue. Mr. Bowcock made some assertions regarding odors and other nuisance issues.

The Regional Board is seeking information regarding the effectiveness of odor suppressants. Prior to the field activities of the upcoming excavation pilot test you are required to provide the following information:

1. Inspection reports of the South Coast Air Quality Management District (SCAQMD) from the first excavation pilot test;
2. The results of the evaluation of the alternate odor suppressants and methodologies to ensure that odors will be mitigated to the maximum extent practicable; and
3. An evaluation of the effectiveness of the relocation of residents of, and control of access to, the pilot test property. Note that persons who do not have HAZWOPER training and certification

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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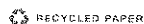


EXHIBIT NO. 2 -



must be excluded from the control zone, including the entire pilot test property for the duration of the pilot test.

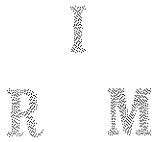
Thank you for your attention to these details. Please call Ms. Paula Rasmussen at (213) 576 6607, Assistant Executive Officer, if you have questions.

Sincerely,


Samuel Unger, PE
Executive Officer

Attachment: Integrated Resource Management, Inc., letter dated November 13, 2012

cc: Laura Richardson, Honorable Congresswoman, US House of Representatives,
California's 37th District
Mr. Mark Ridley-Thomas, Supervisor, Second District County of Los Angeles
Warren T. Furtani, Assembly member, 55th Assembly District
Jim Dear, Mayor of Carson
Sheri Repp-Loadsman, City of Carson
Ky Truong, City of Carson
Jennifer Fordyce, Office of Chief Counsel, State Water Resources Control Board
David Biggs, Carson City Manager
James Carlisle, Office of Environmental Health Hazard Assessment
Bill Jones, Los Angeles County Fire Department
Barry Nugent, Los Angeles County Fire Department
Shahin Nourishad, Los Angeles County Fire Department
Miguel Garcia, Los Angeles County Fire Department
Alfonso Medina, Los Angeles County Department of Health
Cole Landowski, Los Angeles County Department of Health
Angelo Bellomo, Los Angeles County Department of Health
Karen A. Lyons, Shell Oil Products US
Alison Abbott Chassin, Shell Oil Products US
Thomas V. Girardi, Girardi and Keese Lawyers
Robert W. Bowcock, Integrated Resources Management, LLC
Josie Guevara, Carousel Homes



Integrated Resource Management, Inc.

November 13, 2012

Sam Unger, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street; Suite 200
Los Angeles, California 90013

RE: SCP No. 1230, Site ID No. 2040330, CAO No. R4-2011-046
Pilot Excavation 24612 Neptune Avenue, Carson, California

Dear Mr. Unger,

Last week, three separate excavations were made at the above referenced property in the Carousel Tract neighborhood. All three excavations clearly demonstrate ubiquitous petroleum staining from approximately 3' below grade to greater than 10' below grade. All three revealed concrete slabs at approximately 8' below grade. After demolition and removal of the concrete slabs, all three excavations were completed to 10' revealing saturation with petroleum and other chemicals of concern to an unknown depth beyond minimal requirement. All three excavations were perfectly vertical and no horizontal digging under structures was attempted.

This correspondence serves two purposes: 1. To advise you many residents, as well as my employees and subcontractors, became ill from inhalation of the off gasses from the pilot excavations as well as neighbors throughout the surrounding area. Extremely strong odors were present inside the subject home as well as the three adjacent homes; 2. To advise you of our conclusions.

The community, I and our expert consultants have concluded the Pilot Excavation at 24612 Neptune Avenue, Carson, California demonstrate the following:

- At a minimum, excavation to >10' will be required for the entire 50+/- acre site. Inasmuch as the site is greater than 50% covered by structures, removal of all of the structures is the only logical option.
• Excavation of heavily petroleum saturated soils in a residential neighborhood cannot be permitted while residents remain in their homes. Soil gas migration and explosive conditions cannot be properly monitored to insure safety.
• All regulatory agencies have completely conceded to your leadership role for this project and will not intervene so long as YOU are directing activities. What this means is, no matter how sick the people become, no matter how much danger they are in... not a single regulatory agency in the State of California will do anything but defer to your leadership.

We have been waiting many months since the announcement of an "expert panel", yet have heard nothing at all about its status, its assemblage, its plans, its goals or objectives.

Sincerely,

[Handwritten signature of Robert W. Bowcock]

Mr. Robert W. Bowcock
Integrated Resource Management, Inc.

405 North Indian Hill Boulevard
Claremont, CA 91711-4600

(909) 621-1266
(909) 621-1196 Fax



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EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

October 18, 2012

Edward E. Freed
Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810

APPROVAL OF WORK PLAN FOR DELINEATION OF TAR-LIKE MATERIAL IN THE VICINITY OF AT&T EXCAVATIONS NEAR INTERSECTION OF EAST 244TH STREET AND MARBELLA AVENUE PURSUANT TO CLEANUP AND ABATEMENT ORDER - FORMER KAST PROPERTY TANK FARM LOCATED SOUTHEAST OF THE INTERSECTION OF MARBELLA AVENUE AND EAST 244TH STREET, CARSON, CALIFORNIA (SCP NO. 1230, SITE ID NO. 2040330, CAO NO. R4-2011-0046)

Dear Mr. Freed:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the state regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties, including the former Kast Tank Farm Property (Site). Under the oversight of the Regional Board, Shell Oil Products US on behalf of Shell Oil Company (collectively, Shell) is investigating and remediating soil and groundwater impacts at the Site.

The Regional Board has received the document titled *Work Plan for Delineation of Tar-like material in the Vicinity of AT&T Excavations near Intersection of East 244th Street and Marbella Avenue* (work plan) for the former Kast Property Tank Farm dated October 12, 2012 and prepared by URS Corporation (URS) on behalf of Shell Oil Products US (Shell). The work plan is submitted in response to the Regional Board directive to develop a work plan to completely delineate the extent of the black and viscous material encountered in the AT&T excavations and to propose a plan for cleanup or abatement of the waste. AT&T performed an excavation of a total of 6 trenches, each excavation was approximately 2 feet by 4 feet in plan dimension and 3 feet deep. In two of the most easterly of the excavation trenches, a black tar-like viscous material oozed out of the wall of the excavation.

Per the Regional Board directive, URS collected samples of stained soil and soft black tar-like material from the walls of the excavations designated as A244305 East and A244305 West, and submitted the laboratory data. The Regional Board staff reviewed the results and concluded that the samples constitute petroleum hydrocarbon compounds. Volatile organic compounds (VOCs) such as BTEX (benzene, toluene, ethylbenzene and xylene) and a volatile polycyclic aromatic hydrocarbons (PAH) compounds such as naphthalene were undetected. Overall the samples do not contain volatile fractions of petroleum hydrocarbon compounds and primarily consist of medium and heavier portions of the petroleum hydrocarbon ranges.

The work plan documents the support provided by URS when AT&T conducted underground telephone communications line repairs within the Carousel Tract. Field support activities include monitoring for volatile organic compounds (VOCs), collection and analysis of soil and hydrocarbon-impacted samples

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

♻️ RECYCLED PAPER

EXHIBIT NO. 3 -



when impacts are identified in excavations opened by AT&T, and coordination for proper disposal of the excavated soils.

The proposed scope of work included advancing a series of hand-auger borings adjacent to the three areas where black tar-like materials were identified, specifically adjacent to AT&T excavations A244305ES East and A244305ES West. Borings will be hand augered to a depth of approximately 5 feet bgs. Hand auger borings will be placed directly adjacent to each of the excavations and at approximately 5 feet from the excavations. Samples of tar-like materials and apparently impacted soils will be collected from selected locations and analyzed based on field judgment.

The proposed work plan is as follows:

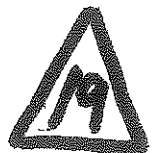
1. At locations designated as A244305ES East and A244305EY1, advance borings in the street directly adjacent to three sides of the excavation and approximately 5 feet from the excavation to the east, west and south as follows:
 - a. Advance three borings in the lawn area north of the sidewalk adjacent to previous excavation A244305EY1;
 - b. Advance a boring in the southwest corner of the front yard at 311 E. 244th Street; step out borings will be advanced if tar-like materials are found in the initial boring on the property;
 - c. Remove a section of the sidewalk in front of the driveway at 311 E. 244th Street to assess the source and remove the tar-like material; and
 - d. Advance three additional borings in the lawn area along the eastern edge of the property located at 305 E. 244th Street north of the sidewalk and adjacent to former AT&T excavation A244305EY1.

Additional borings may be advanced depending on findings from the initial borings.

2. At locations designated as A244305ES, advance three borings directly adjacent to AT&T excavation A244305ES east, west and south of the excavation location. Three additional borings are recommended approximately 5 feet from the excavation.
3. Document boring logs including odor, staining, photoionization detector (PID) readings from the boreholes and sample headspace, and other relevant observations as appropriate.
4. Samples of tar-like materials and apparently impacted soils will be analyzed for TPH as gasoline (TPHg), diesel (TPHd) and motor oil (TPHmo) by EPA Method 8015B (M); Volatile organic compounds (VOCs) by EPA Method 8260B (Method 5035 sample preservation may not be possible for tar-like samples); Semi-volatile organic compounds (SVOCs) by EPA Method 8270C; polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270 SIM, and California Code of Regulations Title 22 total Metals by EPA Method 6010B/7471A.

Based on the review of the work plan and documents in our file, you are authorized to implement the work with the following additions:

1. Prior to the start of the field-scale proposed activity, all necessary permits shall be obtained from appropriate agencies. Copies of the agency approved permits must be included in the final report submitted to the Regional Board.
2. Notify Regional Board staff at least 72 hours before you start the proposed fieldwork.



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3. Properly manifest and dispose all wastes generated during the field activities in compliance with State and Federal regulations. Copies of the manifest(s) for waste disposal shall be included in the final report submitted to the Regional Board.
4. A final report must include the laboratory results, interpretations, conclusions and, if warranted, a plan for additional cleanup or abatement of the waste. The implementation of the proposed fieldwork is subject to all appropriate agencies issuing the required permits. The report is due within 45 days of receipt of the analytical data.

All technical reports are required to be submitted by the due dates specified above are in accordance with the existing CAO dated March 11, 2011. Pursuant to section 13350 of the California Water Code, failure to submit the required reports by the due dates above may result in monetary civil liability administratively imposed upon you by the Regional Board in an amount up to five thousand dollars (\$5,000) for each day the report is not received.

Please note that, the Regional Board requires you to include a perjury statement in all reports submitted under the 13304 order. The perjury statement shall be signed by a senior authorized Shell Oil Products US representative (and not by a consultant). The statement shall be in the following format:

" I, [NAME], do hereby declare, under penalty of perjury under the laws of State of California, that I am [JOB TITLE] for Shell Oil Company that I am authorized to attest to the veracity of the information contained in [NAME AND DATE OF REPORT] is true and correct, and that this declaration was executed at [PLACE], [STATE], on [DATE]."

If you have any questions, please contact, Dr. Teklewold Ayalew, project manager, at (213) 576-6739 (tayalew@waterboards.ca.gov), or Ms. Thizar Tintut-Williams, Site Cleanup Unit III Chief, at (213) 576-6723 (twilliams@waterboards.ca.gov).

Sincerely,


Samuel Unger, PE
Executive Officer

cc: Mailing List



Mailing List

Laura Richardson, Honorable Congresswoman, US House of Representatives, California's 37th District
Mark Ridley-Thomas, Supervisor, Second District, County of Los Angeles
Warren T. Furtani, Assembly member, 55th Assembly District
Jim Dear, Mayor of Carson
Sheri Repp-Loadsman, City of Carson
Ky Truong, City of Carson
Jennifer Fordyce, Office of Chief Counsel, State Water Resources Control Board
Alexander Morelam, Los Angeles Unified School District (LAUSD)
Patrick Schanen, LAUSD
David Biggs, Carson's City Manager
James Carlisle, Office of Environmental Health Hazard Assessment
Robert Romero, Department of Toxic Substances Control
Bill Jones, Los Angeles County Fire Department
Barry Nugent, Los Angeles County Fire Department
Shahin Nourishad, Los Angeles County Fire Department
Miguel Garcia, Los Angeles County Fire Department
Alfonso Medina, Los Angeles County Department of Health
Cole Landowski, Los Angeles County Department of Health
Angelo Bellomo, Los Angeles County Department of Health
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