



File #: 2015-854, Version: 1

Report to Mayor and City Council

Tuesday, November 17, 2015

Discussion

SUBJECT:

CONSIDER STATUS REPORT ON THE REGIONAL WATER QUALITY CONTROL BOARD ENVIRONMENTAL INVESTIGATION AND CARSON DECLARATION OF THE EXISTENCE OF A LOCAL EMERGENCY WITHIN THE CAROUSEL TRACT (CITY COUNCIL)

I. SUMMARY

This item is on the agenda to provide updates at all regularly scheduled City Council meetings related to the environmental investigation of the Carousel Tract. The remediation project is moving into the implementation phase, and the California Regional Water Quality Control Board (Regional Board) held its first Outreach Committee meeting last month. The committee includes staff members of the Regional Board, the City, the County Supervisor's office, and residents of the community. A new schedule and descriptions of the tasks is included in the attachments (Exhibit No. 1).

II. RECOMMENDATION

CONSIDER and DISCUSS:

III. <u>ALTERNATIVES</u>

TAKE such other action the City Council deems appropriate that is consistent with the requirements of law.

IV. <u>BACKGROUND</u>

History

The California Regional Water Quality Control Board, Los Angeles (Regional Board) is the lead agency overseeing the environmental investigation and cleanup of the

Carousel Tract. The Regional Board issued a Cleanup and Abatement Order No. R4-2011-0046 (CAO) on March 11, 2011 requiring Shell Oil Products US to investigate and clean up discharges of waste in soil and groundwater at the Carousel Tract site.

Recent Events

The activities related to the site investigation and cleanup work performed during the month of September and October 2015 includes the following:

- 1) On October 14, 2015, Regional Board completed the review of a letter titled *Modifications to Groundwater Monitoring Program* in accordance with Amended CAO and issued a response. The Regional Board approved the proposed modification of the groundwater monitoring schedule from quarterly to a semi-annual basis.
- 2) On October 15, 2015, the Regional Board received a document titled Site-Wide Remediation Design and Implementation Plan (RDIP). The RDIP was submitted in response to the July 10, 2015 RAP approval directive. RDIP is the phase in site cleanup where the technical specifications for cleanup remedies and technologies are designed. The RDIP presents:
 - a. The framework and schedule for implementation of the selected remedy that includes tentative project schedule for RAP implementation has been developed and the work is expected to take approximately 5 years. Cleanup will begin in early 2016 and will be completed in clusters of four to ten homes at a time;
 - b. Permitting requirements and regulatory compliance activities such as grading permit, Permit to construct/operate the SVE system, stormwater pollution prevention plan, etc;
 - c. An overview of the Property-Specific Remediation Plans (PSRPs), which will be prepared for each property where remedial work will occur. The work will be conducted on groups of properties referred to as clusters (27 clusters in total). Within each cluster of up to 10 properties work will occur sequentially;

The sequence of remediation activities by cluster has been established to begin construction near the topographic high point of the tract at the southern and southeast part of the tract and move to the low point in the northwest corner to best maintain control of the SVE/bioventing piping grades from high to low (generally south to north) since they must provide for gravity flow of condensate fall-out within the vapor stream.

d. The work that includes removing and replacing soil in front and back yards

and under certain hardscapes, like driveways, walkways, yard walls and patios. In some homes, installation of SVE/bioventing wells and piping, installation of sub-slab depressurization systems, as required or requested, and site restoration;

At least eight weeks prior to the relocation date, a meeting will be held with the homeowners/residents to explain the aspects of the RAP implementation that will be performed at their property, and to provide information about location options for relocation and financial assistance to facilitate relocation, including relocation or boarding of pets and assistance with transportation, if needed

- e. Property owners will be consulted particularly regarding site restoration including any necessary removal and replacement of hardscape and landscaping features to equivalent or better conditions.
- 3) On October 16, 2015, Regional Board staff completed the review of a letter Re: Request for elimination of bucket auger pilot testing at the Site and issued a response. Based on the review of the rationale for not using auger excavation methods for RAP implementation, the Regional Board issued a response letter acknowledging the request.
- 4) On October 26 and 27, Shell conducted group meetings with residents from the first cluster of properties to be remediated. Regional Board staff attended the meeting.
- 5) On October 28, 2015, Regional Board held a Carousel Cleanup Outreach Committee Meeting (Exhibit No. 2).
- 6) On November 21, 2015, Regional Board will host an Open House to share more information about the proposed Remedial Design and Implementation Plan (RDIP), which is currently under Regional Board review.

Residential Sampling Activity

Testing of property in the Carousel Tract is continuing and the latest reports are posted on the Regional Board's website at:

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000000228

As of March 10, 2015, the completed Residential Sampling Activity is as follows:

- 272 homes have been screened for Methane. (95%)
- 273 homes have had soils sampled and vapor probes installed. (96%)
- 273 homes have had vapor probes sampled. (95%)

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- 261 homes have had indoor air sampled. (91%)
- 244 of 261 homes have had their 2nd round of indoor air sampling. (94%)
- 86% of total homes in the Carousel Community have had second round of Indoor Air conducted

Timeline of Activities

A general timeline that tracks past and current activities of the Carousel Tract environmental investigation is included in the attachments (Exhibit No. 3).

For additional information regarding the Carousel community can be found at the following link:

http://ci.carson.ca.us/department/communitydevelopment/carouseltract.asp.

V. FISCAL IMPACT

None.

VI. EXHIBITS

- 1. KAST Update for City of Carson dated November 9, 2015. (pgs. 5-6)
- 2. Regional Waterboard Meeting Summary. (pgs. 7-10)
- 3. Carousel Tract Environmental Investigation Timeline. (pgs. 11-19)

Prepared by: Zak Gonzalez II, Associate Planner, Planning Division

November 9, 2015:

Regional Board Activities Update for the Former Kast Property Tank Farm (Carousel Tract)

The activities related to the site investigation and cleanup work performed during the month of October 2015 include the following:

- On October 15, 2015, the Regional Board received a document titled Site-Wide Remediation Design and Implementation Plan (RDIP). The RDIP was submitted in response to the July 10, 2015 RAP approval directive. RDIP is the phase in site cleanup where the technical specifications for cleanup remedies and technologies are designed. The RDIP presents:
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 - b. Permitting requirements and regulatory compliance activities such as grading permit, Permit to construct/operate the SVE system, stormwater pollution prevention plan, etc:
 - c. An overview of the Property-Specific Remediation Plans (PSRPs), which will be prepared for each property where remedial work will occur. The work will be conducted on groups of properties referred to as clusters (27 clusters in total). Within each cluster of up to 10 properties work will occur sequentially;
 - The sequence of remediation activities by cluster has been established to begin construction near the topographic high point of the tract at the southern and southeast part of the tract and move to the low point in the northwest corner to best maintain control of the SVE/bioventing piping grades from high to low (generally south to north) since they must provide for gravity flow of condensate fall-out within the vapor stream.
 - d. The work that includes removing and replacing soil in front and back yards and under certain hardscapes, like driveways, walkways, yard walls and patios. In some homes, installation of SVE/bioventing wells and piping, installation of sub-slab depressurization systems, as required or requested, and site restoration;
 - At least eight weeks prior to the relocation date, a meeting will be held with the homeowners/residents to explain the aspects of the RAP implementation that will be performed at their property, and to provide information about location options for relocation and financial assistance to facilitate relocation, including relocation or boarding of pets and assistance with transportation, if needed
 - e. Property owners will be consulted particularly regarding site restoration including any necessary removal and replacement of hardscape and landscaping features to equivalent or better conditions.
- 2) On October 26 and 27, Shell conducted group meetings with residents from the first cluster of properties to be remediated. Regional Board staff attended the meeting.

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LA Regional Water Quality Control Board Carousel Cleanup Outreach Committee Meeting Meeting Summary for Wednesday, October 28, 2015 6:00 pm – 8:00 pm

Desired Results:

- Walk away with a shared understanding of the purpose, roles and responsibilities of the Outreach Committee and its members.
- Identify committee member recruitment process.
- Define cleanup outreach and engagement strategies.

Agenda Item	Summary
I. Welcome and	
Agenda Review	 Welcome: Paula provided the welcome and general overview. She thanked everyone for agreeing to participate in the newly-created Carousel Cleanup Outreach Committee and shared that the purpose of this meeting is to launch the committee and to ensure all members walk away with a good understanding about the committee's purpose and member roles. Paula also shared that the Regional Board will chair this committee but will have the support of an external facilitator to move the process and meeting along. Members introduced themselves and the group reviewed the desired results and agenda.
	3. Members reviewed a set of group agreements to guide each of the meetings, including: ✓ Maintain a speaking order ✓ Suspend judgment ✓ Everyone participates ✓ One person speaks at a time. ✓ Respect ✓ No retaliation for speaking honestly
II. Purpose, Roles	A. Context:
& Responsibilities	Members spent time reviewing the Committee, "Welcome" packet which describes the Committee's purpose, and member roles and responsibilities. Members raised the following questions: Q1: Are we going to discuss technical or non-technical issues? A: Members can bring any issues they are hearing from the community without
	having to worry if they are "technical" or "non-technical". If the issues are technical, the committee will ensure that they will be addressed appropriately. Q2: Where will we be meeting and when will meetings be scheduled? A. Members agreed that the next meeting will be held on December 9 th from 6-8

pm in the same venue (City Hall).

Q3: Will Committee members be responsible for distributing Regional Board materials such as the work orders?

A. Committee members will not have to distribute work orders or any other Regional Board materials, that is the charge of the Regional Board.

Q4: How will we ensure that we are telling the same story? Carousel has a number of communications challenges and how will we ensure that we are communicating the same things to people?

A. Next meeting will be dedicated to addressing this question. It will be helpful to debrief some of the activities and events occurring between now and December 9th to determine what worked well and what improvements need to be made so that all members of the committee are speaking with one voice.

Q5: Who will write up questions from residents?

A. TBD

III. Member Recruitment Strategies

A. Context

The membership for this committee consists of up to eight Carousel Community residents. Three slots still remain on the committee. Members brainstormed strategies to recruit other Carousel residents to serve on this committee. The RB team will review the suggested strategies and provide follow-up.

Suggested strategies included:

- Committee member Barbara Post may have some suggestions.
- Committee members can identify folks during the neighborhood meeting on the 7th, the Open House on the 21st, and other events.
- The outreach documents inviting residents to participate needs to clarify the expectations/role for members some might think that they are being asked to do door-to-door outreach and that might be a turn-off.
- A meeting summary/Update can be sent out to all residents with an invitation to blocks still unrepresented to invite residents to participate.
- Provide committee member names/contact information in the update/outreach materials that go out so that interested individuals can call committee members personally to learn more about the committee.
- Committee members need to recruit residents on an on-going basis.
- Committee might want to explore staggering participation to ensure consistent membership.

IV. Outreach & Engagement Strategies

- A. Members spent time brainstorming three topics:
 - 1. Review the Update and discuss outreach to residents and other stakeholders.
 - 2. Brainstorm strategies for gaining 100% participation by homeowners in the cleanup effort.
 - 3. Share information about the RDIP.

1. RB Update and Work Orders

A. The RB designed and mails an Update on a periodic basis to all Carousel residents and interested parties to provide critical information about the cleanup effort. The Updates

provide a timeline, background information, and either key dates or terms Members reviewed examples of the Updates and provided the following feedback:

- Need to design something that stands out a bit more currently it's on a "white" background which doesn't stand out enough and the color of the title needs to stand out more, perhaps with red font.
- Rename the Update as a Newsletter given the length and amount of information.
- There's too much information in the newsletter, it needs to be even simpler.
- The timeline in the Update is good.
- The glossary is still too technical, need to continue simplifying the terms.

Work Order

 Need to emphasize key information like dates and location and make the title stand out more.

Members also discussed how frequently these are needed to engage community residents if there is no "new" news to share.

Members brainstormed the following suggestions:

- Ideally, there is communication with residents at least once a month so that community residents don't feel anxious about the lack of consistent communication.
- The layout for communication tools needs to be consistent so that residents can easily distinguish/associate the purpose of each document.
- Need to include a pitch for the committee.
- If sending something out monthly, and there is no "new" news, then the Newsletter/Update can simply say that there is no new information.
- The reality is that given the next steps in the cleanup effort, it is likely that there will be something to report each month.
- B. Members brainstormed how each of them will conduct outreach to communicate key information about the cleanup and identified the following:
 - Each "block" is different so block representatives and the committee will need to use different approaches depending on the "block".
 - As a follow-up to the work notices, it would be helpful to make calls that are capable of leaving brief messages.
 - Door-to-door could be a strategy depending on the block.
 - Mailing out meeting summaries to all residents.
 - Put questions asked by residents, committee members, etc. in FAQ documents that go out to residents.
 - Hosting events in homes.
 - Need a centralized place to put information online that is easy to use.
 - Need to distribute paper forms because not all residents have computers or email.
 - Shell will set up an office in one of the homes in the community that will be staffed
 and will have paper copies of all the reports. The home can also be used to host
 meetings if necessary.
 - All members agreed that they are comfortable sharing their contact information

with the larger community.

• All members also agreed that they are comfortable with an announcement about your participation in this committee in an Update/Newsletter.

2. 100% Participation

Members worked together to identify strategies to engage those homeowners who are a bit hesitant to provide access to the cleanup crew. The implication is that their hesitation may delay the overall cleanup effort both in the short-term as well as the long-term timeline.

Members suggested the following strategies to address this challenge.

- Need to determine if the properties are empty, renters, homeowners, or unrepresented.
- Need to share addresses with committee members, particularly resident members, and ask if the representative for the block can reach out to reluctant homeowners.
- Need to be delicate and considerate about how these residents are engaged. It is
 important to spend time with these homeowners and delicately ask why they are
 reluctant to allow access. Need to reinforce that this is not their fault and that the
 cleanup crew understands the inconvenience this is causing to homeowners.
- Need to identify a "special person" who can really engage and listen to these homeowners.
- Some residents are sharing that they will not allow access in the future. It will be
 important for this committee to maintain engagement strategies and "listen" to
 residents so that the list can go down over time. This will be accomplished if
 residents have a positive experience with the cleanup effort and come out of each
 stage feeling like "satisfied customers".

3. Remediation Design Implementation Plan (RDIP)

Thizar provided a general overview on the RDIP and shared that there will be an Open House to explain the RDIP and meet one-on-one with residents to address their individual questions. The Open House will be held on November 21st. Residents will be invited to attend one of three time slots organized according to a set of blocks.

Committee members were asked to support outreach to their fellow residents to encourage them to attend the Open House.

Date	Significant Actions/Reports	Notes
March 11, 2008	DTSC informed LARWQCB about	
	former Shell Oil Company Tank	
	Farm	
May 2008	LAWRQCB initiated an	<u> </u>
,	environmental investigation	
December 2008	LAWRQCB approved proposed	
	work plan submitted by Shell to	
j	investigate contaminates of	
	concern	
December 31, 2008	LARWQCB issued California	
December 31, 2000	Water Code § 13267	
	Investigative Order	
October 15, 2009	Shell submitted Final Phase I Site	
000000113, 2003	Characterization Report	
March 2011	LARWQCB issued Cleanup and	
Walch 2011	Abatement Order No. R4-	
	201100046	
February 22, 2013		
February 22, 2013	Shell submitted Site-Specific	
May 2013	Cleanup Goal Report LAWRQCB issued a fact sheet	20 1
Widy 2013		30-day comment period ending
	providing information and	June 24, 2013
,	advising of comment period for	
luma 24, 2012	Site-Specific Cleanup Goal Report	
June 24, 2013	City submitted comments to	Forwarded reports by Everett &
	Site-Specific Cleanup Goal Report	Associates and Soil/Water/Air
h.h. 10, 2012	6: 6	Protection Enterprise
July 18, 2013	City Council conducted	Presentation by Dr. Lorene
	workshop to allow presentation	Everett and James T. Wells PhD
	by Mr. Sam Unger, Executive	raising concerns related to
	Director of LARWQCB	environmental conditions
July 29, 2013	City Council adopted Resolution	
	No. 13-081 declaring the	
	existence of an emergency in the	
	Carousel Tract	
July 30, 2013	Letters sent to the Governor,	Requested immediate
	Attorney General, Los Angeles	assistance due to emergency
	County Board of Supervisors and	conditions in Carousel Tract
1.1. 24 2042	Mr. Unger	
July 31, 2013	City staff, Mr. Bob Bowcock, Dr.	City Council declaration of
	Everett and Mr. Wells met with	emergency conditions
	representatives of Los Angeles	discussed and copies of Everett
	County Fire Department and Los	& Associates reports
	Angeles County Department of	transmitted for review
	Public Health	

August 21, 2013 LARWQCB sent detailed letter to Shell denying proposed sistespecific cleanup goals and requiring revisions to be submitted by October 21, 2013 September 11, 2013 City letter to Mr. Sam Unger City Council and community for response to Site-Specific Cleanup Goal Report LARWQCB community open house CEQA scoping meeting LARWQCB community open house CEQA scoping meeting LARWQCB Public Participation Specialist to conduct office hours at Carson City Hall October 8, 2013 CEQA scoping comments due to LARWQCB from September 9 through October 8, 2013 City staff arranging for a meeting with LARWQCB, LACoFD, Los Angeles County Department of Public Health, OEHHA, Mr. Bowcock, Dr. Everett and Mr. Wells PhD October 21, 2013 Cotober 21, 2013 Los Angeles County Department to LARWQCB and does not include any further evaluation associated with the removal of homes October 24, 2013 Los Angeles County Department Letter states there is not an		Pote Control of the c		
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associated with the removal of homes			include any further evaluation	
homes			associated with the removal of	
	• =			
October 24, 2013 Los Angeles County Department Letter states there is not an				
	October 24, 2013	Los Angeles County Department	Letter states there is not an	
of Public Health Letter to City of immediate health threat from		of Public Health Letter to City of		
Carson site conditions				

Date	Significant Actions/Reports	Notes
October 30, 2013	LARWQCB letter to Shell for review of Community Outdoor Air Sampling and Analysis Report	Based on statistical tests, LARWQCB concludes that outdoor air concentrations do not differ between the site and surrounding area. Shell is required to address OEHHA comments and to develop a work plan for an additional soil- vapor survey by November 29, 2013.LARWQCB determined on January 13, 2014 that no further evaluation required
October 31, 2013	LARWQCB notice on Proposed Draft Revised Cleanup and Abatement Order No. R4-2011- 0046	The proposed draft order names Dole Food Company, Inc. as an additional responsible party. Comments and evidence must be submitted by 12:00 p.m. on December 6, 2013. Dole Food Company has requested an extension to January 2014 to provide comments.LARWQCB approved extension to January 13, 2014. On January 7, 2014, Regional Board approved extension to January 21, 2014
November 12, 2013	Letter to Carousel Tract Owners and Occupants advising of November 19, 2013 City Council Workshop	
November 19, 2013	City Council conducted workshop with Los Angeles County Department of Public Health and Los Angeles County Fire Department	
January 8, 2014		Directs Shell to either remove the residential concrete slabs as appropriate or isolate the residual concrete slabs beneath the foundation of the homes and paved areas using engineering techniques to the extent necessary to address long term health risks or nuisance concerns

Date	Significant Actions/Repo	orts Notes
January 13, 2014	LARWQCB response to Revised	
,,	Community Outdoor Air	concentrations do not differ between
	Sampling and Analysis Report	the site and surrounding area. No
	and many significant	further evaluation required
January 21, 2014	Dole response to Proposed	Dole requested to not be included in
,,	Draft Revised Cleanup and	the Draft Order since their subsidiary,
	Abatement Order No. R4-	Barclay Hollander Corporation, did not
	2011-0046	discharge any of the contaminants of
		concern
January 23, 2014	Community meeting	Meeting to hear from residents and
	organized by Congresswoman	discuss options for obtaining improved
	Hahn	levels of response from the Regional
	1	Board
January 23, 2014	LARWQCB response to Revised	
	Site-Specific Cleanup Goal	the Shell Revised Report and directed
	Report Report	a remedial action plan, Human Health
	, icport	Risk Assessment and other
		environmental documents be
		submitted by March 10, 2014
February 10, 2014	LARWQCB clarification and	LARWQCB removed reference to
	revision to their January 8,	regulations for underground storage
	2014 letter (effective date of	tanks
	January 13, 2014) regarding	taliks
	the Residential Concrete Slab	
	Report	
February 23, 2014	Shell submitted a Petition for	The State Water Resources Control
,,,	Review and Request for	Board has not responded to Shell's
	Hearing to the State Water	petition
	Resources Control Board in	petition
	the matter of Cleanup and	
	Abatement Order R4-2011-	
	0046 (CAO)	
March 10, 2014	Shell submitted Remedial	LARWQCB set a tentative period of 30
	Action Plan (RAP), Human	day to review the documents and
	Health Risk Assessment	provide opportunity for public viewing
	(HHRA), and draft	broade obboutduity for babile MeMIUB
	environmental documents to	
	LARWQCB	
March 19, 2014	LARWQCB filed Notice of	Preparation of a draft Environmental
,	Preparation (NOP)	Impact Report in accordance to the
	1.000.00.00.00.00	California Environmental Quality Act
		(CEQA)
March 25, 2014	LARWQCB and PCR Service	As part of the draft Environmental
	Corporation met with City's	Impact Report, staff discussed
	staff	transportation, noise, and odor
		concerns with LARWQCB and PCR

Caroast	er fract Environmental my	restigation Timeline
April 18, 2014	LARWQCB received comments from LAUSD regarding the NOP	LARWQCB is reviewing LAUSD comments and will provide response
April 30. 2014	LARWQCB responded to Shell's RAP, FS, and HHRA	LARWQCB rejected Shell's proposed cleanup plan and revised RAP to be submitted by Shell by June 16, 2014 by 5 p.m.
April 30, 2014	LARWQCB issued notice of violation (NOV) to Shell for failure to submit a RAP based on approved site-specific cleanup goals	LARWQCB directed Shell to comply by June 16, 2014
May 23, 2014	LARWQCB met with Shell regarding the RAP	LARWQCB discussed deficiencies and revisions with Shell
June 3, 2014	LARWQCB issued notice of opportunity for additional public comment	The deadline to submit public comments is 5 p.m. on June 16,2014
June 4, 2014	LARWQCB granted Shell a two-week extension to submit the revised RAP, FS, and HHRA	The revised documents are due on June 30, 2014
June 16, 2014	Shell submitted additional comments regarding the Proposed Revised Draft Cleanup and Abatement Order No. RB4-2011-0046	The Regional Board is reviewing Shell's comments
June 30, 2014	Shell submitted the revised RAP, FS, and HHRA to the Regional Board	The Regional Board is reviewing the revised documents
July 7, 2014		The documents are part of the draft EIR process

	website	
	website	
	3 5 77	
July 22, 2014	The Regional Board is	Testing result and the Regional Board
	reviewing the RAP, FS, HHRA	latest activities are available at:
	and preparing the draft EIR.	http://geotracker.waterboards.ca.gov/
	Testing of property in the	
	Carousel Tract is ongoing	
August 25, 2014	The Regional Board is	No new dates set for meeting with the
	reviewing the RAP, FS, HHRA	Carousel Tract residents
	and preparing the draft EIR.	
August 27, 2014		
August 27, 2014	The Regional Board released	Tentative release of proposed RAP and
	August 2014 community	Draft EIR in mid October 2014
	update for the Carousel Tract	
September 19, 2014	Shell submitted the RAP	Tentative release of proposed RAP and
	Relocation Plan to the	Draft EIR at end of October 2014, and
	Regional Board	meeting with the Carousel Tract
		resident is projected to begin on
		November 2014
October 8, 2014	The Regional Board continues	The Regional Board required the RAP
	preparation of Draft EIR and	addendums to be submitted by Shell
	review of the RAP	on October 20, 2014. Meeting with
		the Carousel Tract residents is
		projected to occur in the middle of
<u>, , , , , , , , , , , , , , , , , , , </u>		November 2014
October 15, 2014	The Regional Board scheduled	The Regional Board mailed invitations
	community meetings	of community meetings to the
		Carousel Tract residents
October 15, 2014	Shell submitted addendums to	The decomposition is a second
	the RAP, FS, and HHRA	The documents are posted on the
	the NAF, 13, and HIRA	Regional Board website
	•	
November 5, 2014	The Regional Board released	The draft EIR, proposed RAP and
	the draft EIR proposed RAP for	support documents are available at
	public review and comment	the Carson Library, the Los Angeles
		Regional Board Office and website

	ace Environmental mv	
November 12,15,18,20, 2014	The Regional Board held community group meetings with Carousel Tract residents	The discussion was centered on the draft EIR and proposed RAP
November 22, 2014	The Regional Board hosted a public meeting at the Carson Community Center	The discussion centered on the draft EIR and proposed RAP
December 3, 2014	City of Carson Environmental Commission received the draft EIR and proposed RAP for review	City staff will submit the Commission's comments to the Regional Board
December 8, 2014	The Regional Board notified Dole Food Company Inc. (Dole) of its intention to revise the Cleanup and Abatement Order No. R4-2011-0046 CAO)	Barclay Hollander Corporation (Barclay), a wholly-owned subsidiary of Dole, to be named as responsible parties to the Carousel Tract contamination
December 24, 2014	Barclay sent a written request to the Regional Board	Barclay submitted additional written evidence, and schedule a formal evidentiary hearing with the Regional Board
January 6, 2015	Barclay sent a follow up letter to its December 24, 2014 Letter to the Regional Board	Barclay submitted additional documentary evidence to the Regional Board
January 6, 2015	Shell sent a letter to the Regional Board	Shell is opposed to Barclay's requests to submit additional evidence and for a formal evidentiary hearing
January 7, 2015	Integrated Resource Management, Inc. (IRM) responded to Barclay's December 24, 2014 Letter	IRM requested appropriate notice and opportunity to be heard for Carousel Tract residents. IRM also commented on the substance of the revised CAO and attached documentary evidence
January 9, 2015	The Regional Board sent an electronic letter to all interest parties	The Regional Board will consider additional comments on pending procedural request by 5 p.m., January 16, 2015

Carouser Tract Environmental investigation Timeline			
January 15, 2015	Site Cleanup Program Staff (SCP Staff) of the regional Board sent a response letter objecting inclusion of additional evidence into the record as requested by Barclay Hollander Corporation (Barclay)	SPC Staff is requesting opportunity to respond if a hearing for additional evidence is granted by the Chief Deputy Executive Officer of the Regional Board	
January 16, 2015	Barclay sent a letter to the Regional Board	Barclay clarified its scope to submit additional evidence, seek clarification from the Regional Board, and request timing of evidential hearing.	
February 20, 2015	The Regional Board released a "Notification of Work" to the public	Land (public streets) and aerial photographic survey activities are tentatively scheduled from March 2, 2015 to March 20, 2015 for the Carousel Tract and surrounding area	
February 27, 2015	The Regional Board replied to parties and interested persons	The Regional Board accepted Mr. George Bach deposition dated November 19, 2014 into administrative record	
March 11, 2015	The SCP Staff provided explanations to assumptions and copies of graphic results	The explanation addressed the three assumptions in memo dated March 20, 2014 from Dr. C.P. Lai to SCP Staff	
April 2, 2015	SCP Staff, Barclay, and Shell submitted comments to the Regional Board regarding the revised CAO	Barclay is requesting inclusion of Mr. George Bach deposition dated November 19, 2014 into administrative record. SCP Staff and Shell opposed its inclusion	
April 17, 2015	The Regional Board sent letter to all parties and interested persons	Informing all parties and interest persons of the separation of functions between the Advising Team and SCP Staff. The Regional Board intends to issued final action regarding Tentative Revised CAO on or after April 24, 2015	
April 22, 2015	Barclay sent a letter to the Regional Board	Barclay is requesting delay of final action regarding the Tentative Revised CAO until depositions of the SCP Staff are completed	

April 30, 2015	Regional Board sent a letter to Dole and Barclay aka (BHC)	The Regional Board issued the Revised CAO adding Dole and Barclay as responsible parties
May 21, 2015	Barclay sent a letter to the Regional Board	Barclay requests stay and reconsideration of the Revised CAO
June 1, 2015	The Regional Board reported that Barclay filed a petition with State Water Board	Barclay is requesting the State Water Board to Review, petition for stay, and petition to submit supplemental evidence and to conduct a hearing
June 22, 2015	The Regional Board provided a copy of Barclay petition to the State Water Board	The Regional Board and Shell are proceeding with their work in the Carousel Tract regardless of the outcome of Barclay's petition