### CITY OF CARSON



File #: 2016-931, Version: 1

### Report to Mayor and City Council

Tuesday, September 20, 2016
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 the first regularly scheduled City Council meeting of each month related to the environmental investigation of the Carousel Tract. The remediation project has moved into the implementation phase in coordination with the California Regional Water Quality Control Board (Regional Board). On August 29, 2016, a Town Hall meeting was held in the community center. Over 90 residents attended the meeting. Representatives from the Water Quality Board, Shell, AECOM (contractor), Langan (relocation contractor), Cal Water, Gas Company, and Edison were present to address concerns from the residents. More detailed report will be presented during the City Council meeting.

#### II. RECOMMENDATION

CONSIDER and DISCUSS.

#### III. ALTERNATIVES

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

#### IV. BACKGROUND

#### **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**

On August 8, 2016, staff received a letter written to Mr. Douglas J. Weimer of Shell Oil Products US for review of final interim residential sampling report 24808 Panama Avenue (Exhibit No. 1). The letter identified the following:

- The work completed at this time consisted of installing sub-slab soil vapor probes inside the house, reinstalling sub-slab probe in the back yard and collecting sub-slab soil vapor samples from all three probes at the property.
- Methane was not detected in any sub-slab soil vapor probe samples during any sampling event;
- For soil 0 to 5 feet bgs, the non-cancer hazard index is 1.1 and TPH-diesel exceeded their respective site-specific cleanup goal for soil-leaching to groundwater.
- Sub-slab soil vapor data from one indoor and two outdoor sub-slab soil vapor probe samples indicate that the cancer risk index is 6.1 x 10-8 and the non-cancer hazard index is 0.0014.

Since the non-cancer risk is greater than 1 for surface and sub-surface soil samples Shell is directed to advise residents to minimize contact with exposed soil in their yards and minimize disturbance of sub-surface soil as a precautionary measure.

The remedial activities at the Carousel Neighborhood will be conducted in phases, with each phase involving a group of up to ten (10) properties. Each group of properties is referred to as a cluster. The site has been subdivided into twenty-eight (28) clusters that will be remediated over a five (5) year period (Exhibit No. 2). Cluster 1, which commenced in mid-May, is nearing completion and Cluster 2 to begin.

### **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%)

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- 273 homes have had vapor probes sampled. (95%)
- 261 homes have had indoor air sampled. (91%)
- 244 of 261 homes have had their 2<sup>nd</sup> round of indoor air sampling. (94%)
- 86% of total homes in the Carousel Community have had second round of Indoor Air Sampling 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:

<a href="http://ci.carson.ca.us/department/communitydevelopment/carouseltract.asp">http://ci.carson.ca.us/department/communitydevelopment/carouseltract.asp</a>.

### V. FISCAL IMPACT

None.

#### VI. EXHIBITS

- 1. Board letter to Mr. Weimer, Shell Oil Products US, 8-8-16. (pgs. 4-7)
- 2. AECOM Remediation Cluster & Implementation Sequence Map (pg. 8)
- 3. Carousel Tract Environmental Investigation Timeline. (pgs. 9-17)

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





#### Los Angeles Regional Water Quality Control Board

August 8, 2016

Douglas J. Weimer Shell Oil Products US 20945 S. Wilmington Ave. Carson, CA 90810

REVIEW OF FINAL INTERIM RESIDENTIAL SAMPLING REPORT FOR 24808 PANAMA AVENUE 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. Weimer:

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 above referenced site. To accomplish this, the Regional Board issues investigative orders and requirements for submission of technical reports authorized by the Porter-Cologne Water Quality Control Act.

The Regional Board has received and reviewed the document titled *Final Interim Residential Sampling Report* (Report) for the home located at 24808 Panama Avenue, Carson, California, dated July 28, 2016 and prepared by AECOM on behalf of Shell Oil Products US (Shell). This residential property lies within the footprint of the former Kast Property Tank Farm (KPTF). The Report is prepared subsequent to approval of a soil, sub-slab soil vapor, and indoor air sampling work plan dated September 24, 2009, and a human health screening evaluation (HHSE) work plan dated November 19, 2009 pursuant to the California Water Code (CWC) section 13267 Order to investigate the individual residential properties occupying the former KPTF. The Office of the Environmental Health Hazard Assessment (OEHHA) is assisting the Regional Board in the evaluation of the potential risk to human health. Based on the *Interim Soil and Sub-Slab Soil Vapor Residential Sampling Report* dated April 24, 2014, AECOM identified an additional round of sub-slab soil vapor sampling and analysis to be conducted to assess potential seasonal variability. The work completed at this time consisted of installing sub-slab soil vapor probes inside the house, reinstalling sub-slab probe in the back yard, and collecting sub-slab soil vapor samples from all three probes at the property. This letter briefly describes the findings and identifies follow-up actions.

The results of the investigation are reported as follows:

- Methane was not detected in any sub-slab soil vapor probe samples during any sampling event at this home.
- Data from 20 previous surface and sub-surface soil samples (0 to 10 feet below ground surface (bgs), collected from 5 soil borings in the front and back yards, indicate that the cancer risk index is  $8.3 \times 10^{-7}$  and the non-cancer hazard index is 0.18.

THINA MUNOZ, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

• For soil 0 to 5 feet bgs, the non-cancer hazard index is 1.1 and TPH-diesel exceeded their respective site-specific cleanup goal for soil-leaching-to groundwater.

- 2 -

• Sub-slab soil vapor data from one indoor and two outdoor sub-slab soil vapor probe samples indicate that the cancer risk index is  $6.1 \times 10^{-8}$  and the non-cancer hazard index is 0.0014.

Based on the information submitted in the Report, you are required to provide the following additional information and/or perform the activities listed below at this home:

- 1. Since the non-cancer hazard index is greater than 1 for surface and sub-surface soil samples, you are directed to advise residents to minimize contact with exposed soil in their yards and minimize disturbance of sub-surface soil as a precautionary measure.
- 2. Since the cancer risk index is below threshold level for indoor and outdoor sub-slab soil vapor samples, the data do not warrant additional sampling and interim actions at this time.

Please note that the Regional Board concurs with the comments provided by OEHHA (copy attached).

Therefore, based on the information submitted in the Report, you are authorized to implement the recommended shallow soil excavation to 5 feet bgs and installation of soil vapor extraction (SVE)/bioventing wells in accordance with the approved Revised Remedial Action Plan (RAP) and Addendum to the Revised RAP.

The implementation of the above recommended remediation activities as per the Regional Board's approved Remedial Design Implementation Plan (RDIP) dated December 3, 2015.

The due date of the required technical reports constitute an amendment to the requirements of the Order All other aspects of Order originally dated March 11, 2011, and amendments thereto, remain in full force and effect. Pursuant to section 13350 of the California Water Code, failure to comply with the requirements of the Order, by the specified due date, including dates in this amendment, may result in civil liability administratively imposed by the Regional Board in an amount up to five thousand dollars (\$5000) for each day of failure to comply.

The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker database. You are required not only to submit hard copy reports required in this Order but also to comply by uploading all reports and correspondence prepared to date and additional required data formats to the GeoTracker system. Information about GeoTracker submittals, including links to text of the governing regulations, can be found on the Internet at the following link:

http://www.waterboards.ca.gov/water\_issues/programs/ust/electronic\_submittal

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 the project manager, Dr. Teklewold Ayalew at (213) 576-6739 (teklewold.ayalew@waterboards.ca.gov), or Ms. Thizar Tintut-Williams, Site Cleanup Unit III Chief, at (213) 576-6723 (thizar.williams@waterboards.ca.gov).

Sincerely,

Samuel Unger, PE
Executive Officer

Attachment:

OEHHA Memorandum dated August 1, 2016

cc:

Janice Hahn, Honorable Congresswoman, US House of Representatives,

California's 44th District

Mark Ridley-Thomas, Supervisor, Second District County of Los Angeles

Isadore Hall, III, Assembly member, 64th Assembly District

Jim Dear, Mayor of Carson

Jackie Acosta, Carson Acting City Manager

Ky Truong, City of Carson

Michael Lauffer, Chief Counsel, State Water Resources Control Board

Frances McChesney, Senior Staff Counsel, State Water Resources Control Board

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 Kim Clark, Los Angeles County Fire Department Hoang Ly, Los Angeles County Fire Department

Cyrus Rangan, Los Angeles County Department of Health Angelo Bellomo, Los Angeles County Department of Health

Karen A. Lyons, Shell Oil Products US

Thomas V. Girardi, Girardi and Keese Lawyers

Robert W. Bowcock, Integrated Resources Management, LLC

Craig Gordon, Carousel Homes

### Office of Environmental Health Hazard Assessment

Matthew Rodriquez Secretary for Environmental Protection

Lauren Zeise, Ph.D., Acting Director
Headquarters • 1001 I Street • Sacramento, California 95814
Mailing Address: P.O. Box 4010 • Sacramento, California 95812-4010
Oakland Office • Mailing Address: 1515 Clay Street, 16<sup>th</sup> Floor • Oakland, California 94612



#### MEMORANDUM

TO:

Teklewold Ayalew, PhD, PG

Engineering Geologist

Regional Water Quality Control Board

320 West 4th Street, Suite 200

Los Angeles, CA 90013

FROM:

James C. Carlisle, D.V.M., M.Sc.,

Staff Toxicologist

Integrated Risk Assessment Branch

DATE:

August 1, 2016

SUBJECT:

FINAL INTERIM RESIDENTIAL SAMPLING REPORT FOR 24808

PANAMA AVENUE, CARSON, CALIFORNIA, (R4-15-011)

OEHHA #880212-06

#### **Document reviewed**

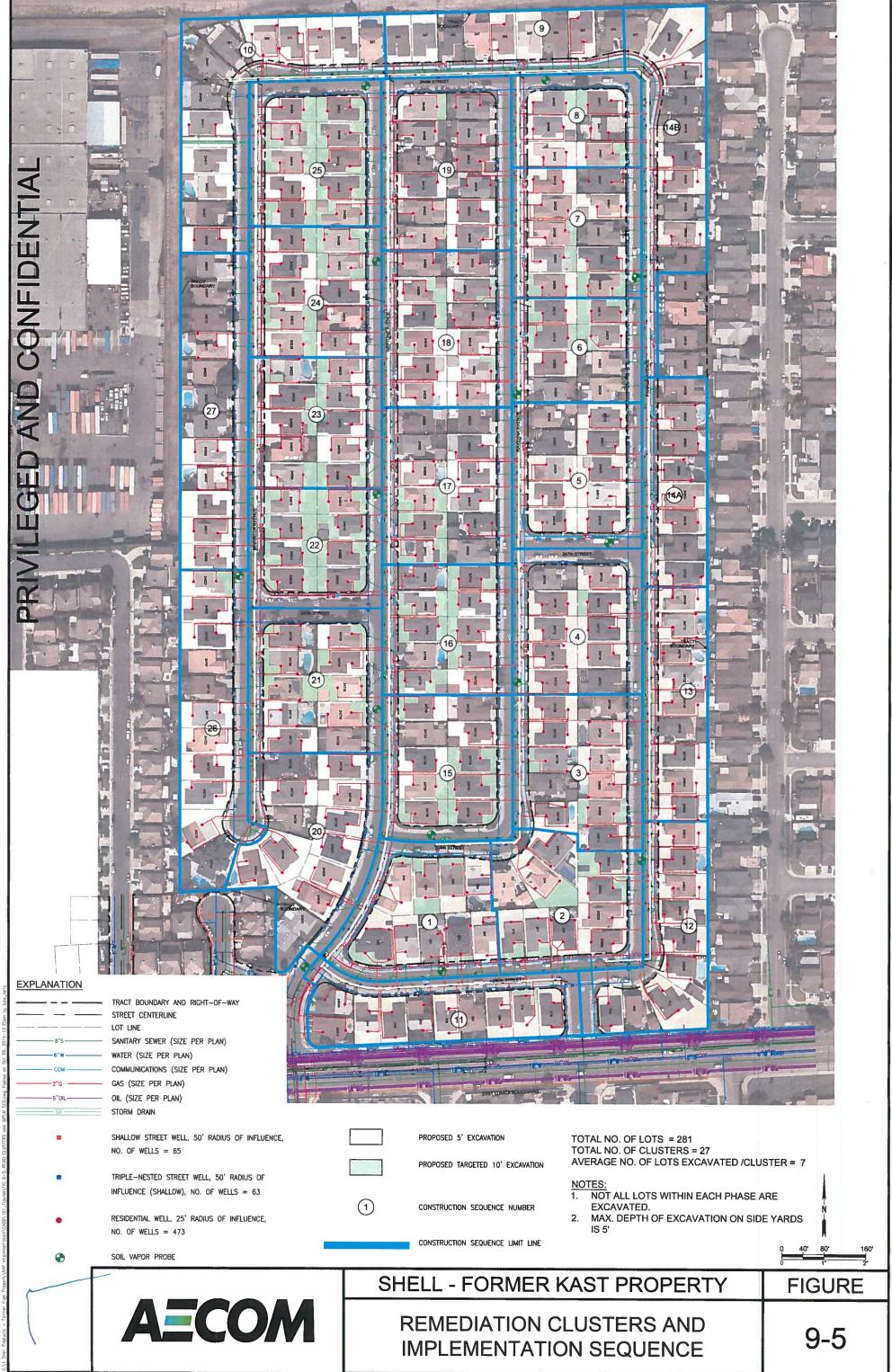
 Final Interim Residential Sampling Report for 24808 Panama Avenue, Carson, California, dated July 28, 2016

#### Results of Review

- The assessment followed the September 21, 2009 Work Plan for Phase II Site Characterization and the Addendum Work Plan for Phase II Site Characterization dated April 19, 2010 (URS, 2010), approved by the LARWQCB on September 24, 2009 and April 28, 2010, respectively.
- Based on random checking, OEHHA did not identify any data or calculation errors.

#### Conclusions

OEHHA agrees with the conclusions in the report.



Date	Significant Actions/Reports	Notes
March 11, 2008	DTSC informed LARWQCB about	
, , , , , , , , , , , , , , , , , , , ,	former Shell Oil Company Tank	
	Farm	
May 2008	LAWRQCB initiated an	
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	environmental investigation	
December 2008	LAWRQCB approved proposed	
December 2000	work plan submitted by Shell to	
	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	
Jetober 13, 2003	Characterization Report	
March 2011	LARWQCB issued Cleanup and	
Widi Cit ZOII	Abatement Order No. R4-	
	201100046	
February 22, 2013	Shell submitted Site-Specific	
rebluary 22, 2013	,	
May 2013	Cleanup Goal Report  LAWRQCB issued a fact sheet	20 day as seement region and and and
Way 2013	providing information and	30-day comment period ending
	advising of comment period for	June 24, 2013
,	Site-Specific Cleanup Goal Report	
June 24, 2013	City submitted comments to	Forwarded reports by Everett 9
Julie 24, 2013	Site-Specific Cleanup Goal Report	Forwarded reports by Everett & Associates and Soil/Water/Air
	Site-specific cleanup dour Report	Protection Enterprise
July 18, 2013	City Council conducted	Presentation by Dr. Lorene
July 18, 2013	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	environmental conditions
July 29, 2013	No. 13-081 declaring the	
	existence of an emergency in the	
	Carousel Tract	
July 30, 2013	<u> </u>	Paguastad immediate
July 30, 2013	Letters sent to the Governor, Attorney General, Los Angeles	Requested immediate assistance due to emergency
	County Board of Supervisors and	conditions in Carousel Tract
	Mr. Unger	conditions in Carouser Tract
July 31, 2013	City staff, Mr. Bob Bowcock, Dr.	City Council declaration of
July 31, 2013	Everett and Mr. Wells met with	City Council declaration of 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	transmitted for review
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Date	Significant Actions/Reports	Notes
August 21, 2013	LARWQCB sent detailed letter to	LARWQCB incorporated OEHHA
	Shell denying proposed site-	Memorandum dated July 22,
	specific cleanup goals and	2013 and UCLA Expert Panel
	requiring revisions to be	Interim Report dated July 24,
	submitted by October 21, 2013	2013
September 11, 2013	City letter to Mr. Sam Unger	Expressing appreciation from
		City Council and community for
		response to Site-Specific
		Cleanup Goal Report
September 24, 2013	LARWQCB community open	Request for input from
	house CEQA scoping meeting	community and public agencies
		related to evaluation of
		environmental impacts;
		comment period ends on
		October 8, 2013
September 30 – October 10,	LARWQCB Public Participation	Opportunity for LARWQCB to
2013	Specialist to conduct office hours	meet with residents and
	at Carson City Hall	community stakeholders
October 8, 2013	CEQA scoping comments due to	Comment letters sent by City of
	LARWQCB from September 9	Carson and Bob
	through October 8, 2013	Bowcock/Barbara Post
October 10, 2013	City staff arranging for a meeting	Review of technical reports and
	with LARWQCB, LACoFD, Los	discussion of public agencies
	Angeles County Department of	responses and actions
	Public Health, OEHHA, Mr.	,
	Bowcock, Dr. Everett and Mr.	
	Wells PhD	
October 21, 2013	Shell submitted a Revised Site-	Shell proposed to evaluate
	Specific Cleanup Goal Report to	options that provide excavation
	LARWQCB	in specific areas 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
	of Public Health Letter to City of	immediate health threat from
	Carson	site conditions
	<u> </u>	

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	2011
November 19, 2013	City Council conducted workshop with Los Angeles County Department of Public Health and Los Angeles County Fire Department	
January 8, 2014	LARWQCB response to Assessment of Environmental Impact and Feasibility of Removal of Residual Concrete Reservoir Slabs	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	rts Notes
January 13, 2014	LARWQCB response to Revised Community Outdoor Air Sampling and Analysis Report	LARWQCB concludes that outdoor air concentrations do not differ between the site and surrounding area. No further evaluation required
January 21, 2014	Dole response to <i>Proposed</i> Draft Revised Cleanup and  Abatement Order No. R4- 2011-0046	Dole requested to not be included in the Draft Order since their subsidiary, Barclay Hollander Corporation, did not discharge any of the contaminants of concern
January 23, 2014	Community meeting organized by Congresswoman Hahn	Meeting to hear from residents and discuss options for obtaining improved levels of response from the Regional Board
January 23, 2014	LARWQCB response to Revised Site-Specific Cleanup Goal Report	LARWQCB identified deficiencies in the Shell Revised Report and directed a remedial action plan, Human Health Risk Assessment and other environmental documents be submitted by March 10, 2014
February 10, 2014	LARWQCB clarification and revision to their January 8, 2014 letter (effective date of January 13, 2014) regarding the Residential Concrete Slab Report	LARWQCB removed reference to regulations for underground storage tanks
February 23, 2014	Shell submitted a Petition for Review and Request for Hearing to the State Water Resources Control Board in the matter of Cleanup and Abatement Order R4-2011- 0046 (CAO)	The State Water Resources Control Board has not responded to Shell's petition
March 10, 2014	Shell submitted Remedial Action Plan (RAP), Human Health Risk Assessment (HHRA), and draft environmental documents to LARWQCB	LARWQCB set a tentative period of 30 day to review the documents and provide opportunity for public viewing
March 19, 2014	LARWQCB filed Notice of Preparation (NOP)	Preparation of a draft Environmental Impact Report in accordance to the California Environmental Quality Act (CEQA)
March 25, 2014	LARWQCB and PCR Service Corporation met with City's staff	As part of the draft Environmental Impact Report, staff discussed transportation, noise, and odor concerns with LARWQCB and PCR

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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 City of Carson sent a letter notifying the Carousel Tract residents of the availability of the RAP, FS, and HHRA via the Regional Board	The documents are part of the draft EIR process

	website	
	Website	
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	nttp://geotracker.waterboards.ca.gov/
August 25, 2014	Carousel Tract is ongoing	No.
August 23, 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	The Regional Board released	Tentative release of proposed RAP and
	August 2014 community	Draft EIR in mid October 2014
	update for the Carousel Tract	Draft Elk III IIIId October 2014
	update for the Carouser fract	
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
	Teview of the Ital	the Carousel Tract residents is
		1
		projected to occur in the middle of
October 15, 2014	The Regional Board scheduled	November 2014 The Regional Board mailed invitations
000000113, 2014	community meetings	The Regional Board mailed invitations
	community meetings	of community meetings to the
		Carousel Tract residents
October 15, 2014	Shell submitted addendums to	The documents are posted on the
	the RAP, FS, and HHRA	Regional Board website
Newsphere C 2011	71 0 1	
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
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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

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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