September 23, 2019

Messrs. Edward, Don, Scott and Paul Devore
c/o Mr. Michael Lebow
Slaughter, Reagan & Cole, L.L.P.
625 E. Santa Clara Street, Suite 101
Ventura, CA 93001

Ms. Karlen Galstyan (dba as KG Road Services or SBA Recycling Inc.)
9375 Haskell Avenue
North Hills, CA 91343

SUBJECT: **REVIEW OF ENVIRONMENTAL INVESTIGATION REPORT AND SHALLOW SOIL REMOVAL WORKPLAN**

SITE: **206 AND 210 W. SLAUSON AVENUE, LOS ANGELES, CA (SCP FILE NO. 1457, SITE ID NO. 2040589)**

Dear Mr. Lebow and Ms. Galstyan:

On August 9, 2019, the California Regional Water Quality Control Board (Regional Board), Los Angeles Region, received the *Environmental Investigation Report* (Report) submitted by Bowyer Environmental Consulting, Inc. on behalf of Mr. Michael Lebow, Slaughter, Reagan & Cole, L.L.P., as legal advisor to Messrs. Edward, Don, Scott and Paul Devore (collectively referred to as the Devores) for the above-referenced site (Site). Also, the Regional Board received the Shallow Soil Removal Workplan (Workplan) dated September 10, 2019, submitted by Bowyer Environmental Consulting on behalf of Mr. Michael Lebow, as legal advisor to the Devores.

BACKGROUND

In March 2019, a release of hazardous waste resulted from the explosion of a potentially leaking 9,000-gallon gasoline tanker truck parked at the Site. An adjacent residential property (216 W. Slauson Avenue) to the west of the Site was damaged and the house is in the process of being demolished. The current work being done at the Site and adjacent property is under the direction of the United States Environmental Protection Agency Emergency Response Program (USEPA-ERP), which is the lead agency for the

emergency response. These actions are coordinated with the Regional Board and other State and local agencies to require State and local regulation.

Based on an investigation at a former Shell service station located approximately 350 feet west of the Site, as of 2015, the depth to groundwater in the area was approximately 105 feet below ground surface (bgs) and groundwater flowed towards the north. A clay layer at depths between 15 and 28 feet bgs may have limited vertical migration of the release.

INVESTIGATION REPORT SUMMARY

In June 2019, an investigation was conducted to define the horizontal and vertical extent of impacts of volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPHs) in shallow soil and soil-vapor at the Site, with a total of eighty-nine soil samples were analyzed from nineteen soil borings. Results indicated the following maximum concentrations, exceeding US EPA Regional Screening Level (RSL) for commercial use:

1. TPH-gasoline was detected up to 7,300 milligrams per kilogram (mg/kg) at SV-5 at a depth of 2.5 feet bgs.
2. TPH-diesel was detected to a maximum concentration was 2,000 mg/kg at SV-3 at a depth of 0.5 feet bgs.
3. Benzene was detected up to 31 mg/kg at location SV-5 at a depth of 0.5 feet bgs.
4. Ethylbenzene was detected up to 180 mg/kg at SV-5 at 0.5 and 2.5 feet bgs.
5. Naphthalene was detected up to 100 mg/kg at SV-3 at a depth of 0.5 feet bgs.
6. m,p-Xylene was detected to a maximum concentration was 1,100 mg/kg in SV-3 at 0.5 feet bgs.

The concentrations of benzene and TPH-gasoline in soil are the main area of impacts to shallow soil, present along the center portion of the boundary between the 210 and 216 Slauson Avenue properties, and a second smaller area of impact located near where the former storage tanker was present.

Twenty soil-vapor samples were collected at the Site in June 2019, with maximum concentration detected as follows:

1. TPH-gasoline was detected up to a was 111,000 micrograms per liter (µg/L) at SV-1 at a depth of 15 feet bgs.
2. Benzene was detected up to 3,860 µg/L in SV-2 at a depth of 5 feet bgs.
3. Ethylbenzene was detected up to 5,710 µg/L in SV-2 at a depth of 5 feet bgs.
4. Toluene was detected up to 28,000 µg/L in SV-2 at a depth of 5 feet bgs
5. m,p-Xylene was detected up to 11,400 µg/L in SV-2 at a depth of 5 feet bgs.
6. o-Xylene was detected up to 3,510 µg/l in SV-2 at a depth of 5 feet bgs.

WORKPLAN SUMMARY

The Workplan proposes the following work at the Site (206 W. Slauson Avenue) and adjacent residential property (216 W. Slauson Avenue):

1. Excavate and remove off-site the impacted soil within the upper 10 feet bgs where VOCs and TPH concentrations exceed direct exposure risk-screening criteria.

2. Limit the potential for TPH-gasoline compounds in soil from further mobilizing during future stormwater runoff events.

Following the phased excavations, a series of confirmation samples will be collected for analysis within each area of concern for VOCs and TPH.

REGIONAL BOARD COMMENTS

Based on our review, we approve implementation of the Workplan as proposed with the following comments; complete lateral and vertical delineation soil-vapor concentrations of VOCs and TPH is required along the western side of the southern boundary of the Site extending towards the adjacent residential properties, and include a proposal in the Workplan for additional soil-vapor sampling and analysis to fully assess that boundary. An additional workplan is required for complete assessment of the adjacent residential property (216 W. Slauson Avenue), when building demolition is completed.

A technical report of results of implementation of the Workplan is due to the Regional Board by **December 2, 2019**. Please notify Regional Board staff seven days prior to start of field work associated with the Workplan so that we may arrange to be present.

If you have any questions, please contact me at (213) 576-6740 or at robert.ehe@waterboards.ca.gov.

Sincerely,

Robert J. Ehe

Robert J. Ehe, P.E.
Site Cleanup Program, Unit IV

Electronic copy:
Dr. Ben Castellana, USEPA-ERP
Mr. James W. Bates, Attorney
Mr. Brett Bowyer, Bowyer Environmental Consulting