Response to Comments by Los Angeles Regional Water Quality Control Board (Regional Water Board) for Mobil Station #18-LDL, Located at 4830 Las Virgenes Road, Calabasas, Claim 5499:

Objections To Closure:

Comment 1: Regional Board staff concerns focus on the high TBA (tert butyl alcohol) concentrations in groundwater, the differences in groundwater flow direction reported in the vicinity, comingled plume possibly affecting other sites, some wells showing increasing TBA concentrations so lack of plume stability, lack of soil data, and questions about historical remediation and free product information.

Comment 1a: high TBA concentrations in groundwater

Response 1a: Concentrations of TBA exceed water quality objectives, but the plume is defined and stable and decreasing, and remaining concentrations do not pose a significant risk to human health.

Comment 1b: the differences in groundwater flow direction reported in the vicinity,

Response 1b: Groundwater flow on-Site has been reported consistently to the northwest, consistent with nearby topography.

Comment 1c: comingled plume possibly affecting other sites,

Response 1c: Downgradient wells MW08, MW13 and MW15 report stable and decreasing concentrations of TBA. Far downgradient well MW14 reports nondetect levels of TBA. There is no clear indication that the TBA plume is commingled with the off-site plumes. Well MW09, noted by the Regional Board as a possible indicator of plume commingling, is immediately northwest (downgradient) of the area of historical free product (wells MW10, MW11 and MW16) and is within the plume core. The detection of concentrations of TBA in MW09 is not an indication of a groundwater flow direction other than the northwesterly flow that has been measured at the Site.

Comment 1d: some wells showing increasing TBA concentrations so lack of plume stability,

Response 1d: Wells within the core of the plume (wells MW05, MW06, MW09, and former well MW02) reporting increasing or variable concentrations of TBA does not indicate that the plume is not stable. TBA concentrations in perimeter wells are all stable or decreasing. TBA is a byproduct of biodegradation of MTBE and can build up temporarily in the core anaerobic portion of a plume. TBA concentrations in well MW12 as well as downgradient wells MW08, MW13, MW15, and MW14 are stable or decreasing.

Comment 1e: lack of soil data

Response 1e:

1) The case satisfies the Policy Criterion 2 for Indoor Vapor Risk as the case meets the Policy Exclusion for an Active Station. Soil vapor evaluation is not required because Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable risk.

2) The case meets Policy Criterion 3 for Direct Contact and Outdoor Vapor Risk through Criterion 3b. The Site is paved and accidental exposure to potentially impacted soils is prevented. As an active petroleum fueling facility, any construction worker working at the Site will be prepared for exposure in their normal daily work.

Comment 1f: questions about historical remediation and free product information

Response 1f: Free product was reported in wells MW10, MW11, and MW16 during the 1992 to 1995 time frame (ERI, 2009). The maximum free product thickness reported was 2.63 feet in well MW11 in February 1994. Various removal events of free product/water mixtures as well as the removal of 13,779 gallons of free product and 170 tons of soil in 1994 are noted by the Regional Board. No free product has been reported since 1995.