
Los Angeles Regional Water Quality Control Board

May 6, 2015

Mr. Alex Liftis
Caruso Affiliated Holdings
101 The Grove Drive
Los Angeles, California 90036

SUBJECT: REVIEW OF SITE REMEDIATION REPORT

SITE/CASE: MARINA WATERSIDE CENTER (FORMER BON MARCHE ONE HOUR DRY CLEANERS) 4704 ADMIRALTY WAY, MARINA DEL REY, CALIFORNIA (SCP NO. 0923B, SITE ID NO. 204AK00)

Dear Mr. Liftis:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency responsible for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced site (Site).

Regional Board staff reviewed the "Report of Site Remediation" (Report), dated March 2, 2006, prepared by Kleinfelder on behalf of Caruso Affiliated Holdings. The Report documents the remediation and confirmation sampling activities performed at the Site. The Report recommends a no further action with respect to soil and groundwater.

BACKGROUND

The former dry cleaner is located within the Marina Waterside Shopping Center from approximately 1970 to 1987 and is now part of the Ralphs supermarket. Site assessments conducted in 2003 and 2004 identified volatile organic compounds (VOCs) impacted soil, soil vapor, and groundwater beneath the Site. Groundwater was encountered at a depth of 9 to 10 feet below ground surface (bgs). Tetrachloroethene (PCE) and trichloroethene (TCE) were detected in soil at maximum concentrations of 33 milligrams per kilogram (mg/kg) and 24 mg/kg, respectively, at a depth of 5 feet bgs. PCE and TCE in soil vapor were detected at a maximum concentration of 23,777 micrograms per liter ($\mu\text{g/L}$) and 457 $\mu\text{g/L}$, respectively. PCE and TCE were detected in groundwater at a maximum concentration of 250 $\mu\text{g/L}$ and 80 $\mu\text{g/L}$, respectively.

SUMMARY OF TECHNICAL REPORT

The scope of work in the Report includes soil remediation by excavation, followed by confirmation soil, soil vapor and grab groundwater sampling.

The major findings of the Report are:

1. Three soil excavation activities were conducted in two phases due to utilities conflict and site improvement logistics to expand the Site as part of the Ralphs supermarket. The soil excavation was focused on mitigating the area of most significant soil impact. During the first phase, two areas northeast and southwest of the high voltage lines at the Site were excavated. The southwest area was excavated to a maximum depth of approximately 11 feet bgs. The northeast area was excavated to a maximum depth of approximately 14 feet bgs. An estimated 1,400 gallons of groundwater was removed during the excavation activities. An estimated 1,800 tons of soil was removed, of which approximately 482 tons of VOC-impacted soil was transported offsite for disposal.
2. During the second phase, the western and central areas of the Ralphs receiving area were excavated to a maximum depth of 10 feet bgs. An estimated 300 tons of soil was removed, of which approximately 43 tons of VOC-impacted soil was transported offsite for disposal.
3. Horizontal perforated piping (for soil vapor extraction) was installed in several areas during the excavations for future soil remediation, if necessary.
4. Site constraints required leaving a limited amount of soil with PCE and TCE concentrations exceeding their USEPA Preliminary Remediation Goals for industrial soil in place. The maximum concentration of PCE (2.74 mg/kg) was detected in sample KA-RCV-3@6' at a depth of 6 feet bgs from the northwest wall of the Ralphs receiving area excavation. The maximum concentration of TCE (4.79 mg/kg) was detected in sample KA-RCV-1@8' at a depth of 8 feet bgs from the southwest wall of the Ralphs receiving area excavation.
5. Analytical results from a grab groundwater sample collected in the northeast excavation indicated PCE and TCE concentrations of 137 µg/L and 159 µg/L, respectively.
6. The maximum soil vapor PCE (281 µg/L) and TCE (55 µg/L) concentrations were detected in vapor probe RV9 located south of the Ralphs receiving area and exceed their respective Residential and Commercial/Industrial California Human Health Screening Levels (CHHSLs). The results of the Johnson and Ettinger model for subsurface vapor intrusion into buildings indicate a cancer risk of 4×10^{-5} , based on the sum of the cancer risk for the 95 percentile upper confidence limits for PCE and TCE concentrations and sand as a soil type.

The conclusions and recommendations of the Report are:

1. The Report concluded that no further remedial action or mitigation is necessary with respect to soil based on the relatively low cancer risk and lack of noncancer hazard result from the health risk assessment.
2. The Report also concluded that based on the age of the release, source removal activities, groundwater confirmation results, known brackish groundwater conditions beneath the Site, and the distance to the nearest drinking water supply well, the level of impacted groundwater concentration do not pose a threat to human health; therefore, the Report recommended no further action with respect to groundwater.

REGIONAL BOARD COMMENTS

Based on the review of the Report, VOCs concentrations in soil and groundwater at the Site still exceed their corresponding screening levels for the protection of human health and the environment even after the limited soil excavation activities. Therefore, Regional Board staff can not recommend the Site for a no further action at this time and have the following comments:

For Soil:

1. Residual concentrations of PCE in soil vapor ranged from 5.2 µg/L to 281 µg/L and residual concentrations of TCE in soil vapor ranged from non-detect (<0.5) to 55 µg/L. The CHHSL for commercial/industrial land use for PCE and TCE is 0.603 µg/L and 1.77 µg/L, respectively. The maximum cancer risk of 4×10^{-5} at 5 feet bgs exceeded the de minimis risk threshold of 1×10^{-6} and is within the risk management range of 1×10^{-6} to 1×10^{-4} and the maximum non-carcinogenic hazard quotient from vapor intrusion is less than one.
2. Residual concentration of PCE and TCE remain in the vadose zone that exceeds the Regional Screening Levels for the protection of groundwater.

The Regional Board does not have a toxicologist on staff and cannot fully evaluate the adequacy of the health risk assessment; therefore, the Report has been submitted to the Office of Environmental Health Hazard Assessment (OEHHA) for review and comment. Once OEHHA has completed their evaluation and provide their comments, a separate correspondence for the next steps with respect to soil will be issued for the Site.

For Groundwater:

1. Complete groundwater assessment and monitoring has not been conducted at the Site. The maximum historical PCE concentration detected was 250 µg/L prior to remediation, and 137 µg/L following the soil excavation activities. The maximum historical TCE concentration detected was 80 µg/L prior to remediation, and 159 µg/L following the soil excavation activities.

2. PCE and TCE were detected at concentrations in groundwater that exceed their respective maximum contaminant levels. In addition, only one confirmation grab groundwater sample was collected following the soil excavation activities which is not adequate to assess the Site groundwater conditions. The lateral and vertical extents of groundwater contamination has not been fully assessed.

Submit a work plan to fully evaluate the groundwater conditions on and offsite by **June 30, 2015**.

If you have any questions, please contact Ms. Jillian Ly, at (213) 576-6664 (jillian.ly@waterboards.ca.gov).

Sincerely,



Jillian Ly, P.E.
Water Resources Control Engineer
Site Cleanup Unit III