

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGIONCENTRE PLAZA DRIVE  
MONTREY PARK, CA 91754-2156  
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February 16, 1994

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FEB 17 1994

Mr. Greg Gilroy, District Manager  
The RREEF Funds  
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NO FURTHER ACTION DECISION CONCERNING VOLATILE ORGANIC COMPOUND GUIDED SOIL REMEDIATION FOR FORMER GRAHAM PRINTING AND LITHOGRAPH SITE AT 17475 GALE AVENUE, CITY OF INDUSTRY, CA (FILE NO. 105.0113)

The following documents prepared by ICF Kaiser Engineers, Inc., unless otherwise noted, were received and reviewed by this Regional Board's staff regarding the above referenced matter:

- A. Revised "Soil Gas Survey Work Plan and Historical Chemical Use Audit and Assessment Plan" dated September 1, 1993.
- B. "Summary of Findings for the Soil Gas Survey" dated October 13, 1993.
- C. "Historical Chemical Use Audit and Assessment" dated October 13, 1993.
- D. "Report of Supplemental Site Investigation Work" dated December 13, 1993.
- E. "Quarterly Groundwater Quality Monitoring Report" dated December 17, 1993.
- F. "Phase I--Environmental Site Assessment Report" prepared by ATEC Environmental Consultants, dated April 15, 1993, and labeled "Draft".

SITE HISTORICAL BACKGROUND

Elevated levels of TPH (180,000 mg/kg @ surface, 1,190 mg/kg @ 5 feet below the ground surface-bgs) and lesser concentrations of the volatile organic compound (VOC) 1,1,1-TCA (50 ug/kg) and ketones; acetone (370 ug/kg), MEK (170 ug/kg) and 4-methyl-2-pentanone (240 ug/kg) were detected in soil matrix samples collected at the site by Terra Tech Labs (TTLs) and documented in a report dated December 26, 1988. These results led to the installation of an on-site ground-water monitoring well (MW) by Geological Audit Services (GeoAudit) in September 1989. GeoAudit sampled the MW in October 1989, neither total recoverable petroleum hydrocarbons (TRPH), VOCs or ketones were detected. However, additional groundwater sampling

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(performed by GeoAudit in January and May of 1991) showed low levels of TRPH (4 mg/L maximum) were detected during both sampling events while the analytical results for VOCs (7.5 ug/L 1,1-DCE and 4.4 ug/L 1,1,1-TCA) were only reported for the January 1991 sampling event.

On November 24, 1992, ATEC Environmental Consultants (ATEC) drilled four borings to depths of 30 feet each (groundwater at the site is approximately 32 to 36 feet bgs) and submitted 24 samples for TRPH and VOC analysis. 1,1-DCE (23 ug/kg maximum) and 1,1,1 TCA (44 ug/kg maximum) were present in samples collected from two boreholes at a former drum storage area. VOCs were not detected in samples from the other two boreholes near the former compressor area. TRPHs were not detected above California State Action levels in any of the samples.

Subsequently Board staff required further investigation of subsurface soils (i.e. shallow and deep soil gas sampling) as well as additional groundwater monitoring for TRPH and VOCs to determine whether waste discharge(s) at the referenced facility were further impacting soils and/or polluting groundwater.

Results of an initial soil gas investigation conducted by ICF Kaiser Engineers (ICF KE) and documented in a report dated October 13, 1993, indicated that localized concentrations of 1,1,1-TCA and 1,1-DCE (each <200 ug/L) were present in subsurface soils. 1,1,1-TCA (6 ug/L) and 1,1-DCE (21 ug/L) had been detected in groundwater samples collected by ATEC and included in a report dated January 18, 1993.

In a Board letter dated November 9, 1993, Board staff recommended that although the existing data indicated that VOC driven soil remediation may not be necessary, a limited supplemental soil gas investigation should be conducted at the site to verify that higher concentrations of vapor phase VOCs did not exist at depth in the two areas of concern identified during the previous investigation. As discussed at a meeting attended by Board staff, Mr. Gilroy and representatives of his consultant on November 3, 1993, (and detailed in the Board letter dated November 9, 1993) it was decided that if VOC concentrations at depth were similar or lower than those of the shallow (initial) readings, VOC guided soil remediation at the site would not be required. However, the Board did require that quarterly groundwater monitoring be instituted along with the supplemental soil gas investigation.

Supplemental soil gas work was conducted by ICF KE on November 24, 1993, at the two areas (former drum storage area and printing equipment pads) where VOC vapor phase contamination had been previously detected. Soil gas samples were collected at 18, 23 and 25 feet bgs (groundwater was measured at 32.42 feet bgs in the on-

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site MW well). The only VOC detected was 1,1-DCE (1.9 ug/L) at a depth of 23 feet bgs. Three groundwater samples were collected (one before purging, one after purging and a post-purging duplicate) from the on-site MW on November 22, 1993, by ICF KE. TRPHs above the detection limit of 1 mg/L were not detected in any of the samples. The highest concentration of VOCs, 1,1-DCE (120 ug/L) and 1,1,1-TCA (21 ug/L) were detected in the post-purging duplicate groundwater sample. It should be noted that releases of 1,1-DCE and 1,1,1-TCA to groundwater have been documented at other facilities nearby.

Based upon the existing data and since analytical results of the (most recent, generally deeper) supplementary soil gas investigation showed that vapor phase concentrations for 1,1-DCE and 1,1,1-TCA are lower or were not detected above applicable detection limits as compared with the initial (generally shallower) soil vapor concentrations this Board will not require VOC guided soil remediation at the referenced property.

However, since shallow soils at one (or more) areas within the property have been impacted by waste discharge(s) resulting in elevated levels of TPH in the soil(s), the site is being referred to the Los Angeles County Fire Department for oversight of appropriate remedial activities/soil cleanup.

The TPH cleanup level of 100 mg/kg agreed upon in a soil remediation plan submitted earlier by Graham Printing and Lithograph will apply unless your consultant proposes and substantiates another level. Additionally, a representative number of samples must be analyzed for VOCs as part of the confirmatory sampling associated with the soil remediation/closure process. This Board would also appreciate being copied on any future correspondence between you and the LACFD including the final closure report.

Although Board staff is not requiring VOC guided cleanup you are still required to collect groundwater samples on a quarterly schedule (as discussed at the November 3, 1993 meeting and detailed in the November 9, 1993, Board letter) during the TPH guided remediation process and for a period of two quarters following completion of remediation activities (as acknowledged in a closure letter from LACFD). Three copies of the results/report of each monitoring episode must be submitted to this regional Board on a timely basis. Results for the next sampling event must be received by this Board on or before April 29, 1994. If the referenced property is sold the groundwater monitoring requirements, and any other Board requirements set forth in this letter must still be fulfilled unless more recent Board correspondence states otherwise. Also, before transferring responsibility for any outstanding requirement(s) the party assuming responsibility and the party

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relinquishing responsibility must submit written documentation to this Board detailing such transfer(s).

The above no further action determination regarding VOC guided soil cleanup is based upon data and information developed by ICF Kaiser Engineers and The RREEF Funds to date. In accordance with its legal authority if contrary information arises in the future, this Regional Board has the option of ordering additional investigation or taking other actions as deemed appropriate.

Additionally, the jurisdictional requirements of other agencies, such as the U. S. Environmental Protection Agency and the California-EPA, Department of Toxic Substance Control are in no way affected by this determination. Such agencies may choose to evaluate the situation and make their own determinations.

Please contact Rick Kaumeyer at (213) 266-7529 if you have any questions concerning this matter and address all correspondence to his attention.



HANK H. YACOUB  
Supervising Water Resource  
Control Engineer

HHY:rsk

cc: Mr. Phillip Ramsey, USEPA, Region 9  
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Mr. Don Howard, Howard Engineers, Puente Basin Watermaster  
Mr. John Maulding, San Gabriel Valley Watermaster  
Mr. Alejandro Fernandez, ICF Kaiser Engineers, Inc. (with  
Enclosure)

Enclosure (1)