

RESPONSE TO ORANGE COUNTY COMMENTS
HUNTINGTON CENTER CAR WASH CLOSURE CLAIM 2215

Comment 1: In the checklist the site is listed as exempt from vapor intrusion due to the status as an operating gas station. Please note a daycare facility is immediately adjacent to the Site.

Response: As the Review Summary Report notes, the adjacent properties meet the Petroleum Intrusion to Indoor Air media-specific criteria. Specifically, the adjacent properties meet Policy Criteria 2a by Scenario 3a because the maximum benzene concentration in groundwater is less than 100 µg/L and the minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 mg/kg of TPH (using off-Site post-remediation data, including wells located on the daycare property).

Comment 2: The boring at the daycare facility contained benzene at 5.9 mg/kg and ethylbenzene at 54 mg/kg, respectively, at 7.5 feet bgs, both of which exceed the 0-10 foot criteria for residential use (the LTCP does not give guidance for other sensitive uses). While recognizing this data is from 2001, the sensitive nature of the offsite receptor warrants collections of confirmation soil samples to verify 1) the existing levels and extent of soil contamination and 2) if current levels exceed those in Table 1 of the LTCP.

Response: The referenced soil sample collected from the Montessori School site was collected over 12 years ago and before remediation was implemented at the Site. As a result of soil excavation, soil vapor extraction and removal of more than 1,200,000 gallons of impacted groundwater, only the water quality objectives for benzene and MTBE are slightly exceeded in three of 12 monitoring wells at this Site. As the playground is unpaved, season rainfall over the years would have continuously flushed any residual petroleum hydrocarbons from the soil and into the groundwater. Review of the latest ground water results for MW-7 and MW-8 located adjacent to the unpaved school playground found that the only detectable volatile petroleum constituent remaining in groundwater above the water quality objective of 1.0 µg/L was benzene at 2.1 µg/L and 3.2 µg/L, respectively. This demonstrates that there is not a sufficient mass of petroleum hydrocarbon remaining in the soil to impact either the groundwater or volatilize to outdoor air.