



July 10, 2014

VIA EMAIL to USTClosuresComments@waterboards.ca.gov

Ms. Vivian Gomez-Latino
State Water Resources Control Board
1001 I Street, P.O. Box 2231
Sacramento, CA 95812

Comment Letter – Nadeem Raza Proposed UST Case Closure

Golden State Water Company (GSWC) has received the State Water Resources Control Board's (SWRCB) "Nadeem Raza 1358 East Firestone Boulevard, Los Angeles - Notice of Opportunity for Public Comment" letter dated May 8, 2014.

Based on review of a limited number of publically available documents (i.e., possible reports documenting investigation/remediation activities at the site, subsequent to a request in 2001 for additional closure requirements, were not available on the SWRCB's GeoTracker sites) related to the subject underground storage tank (UST) site (e.g., see

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603707618)

GSWC respectfully offers the following comments:

- The subject UST site resides within the boundaries of GSWC's Florence Graham customer service area. However, the GeoTracker website incorrectly designates the Metropolitan Water District of Southern California as the primary water system operator.
- GSWC owns and operates 4 public water-supply wells within a one-mile radius (not including destroyed wells formerly owned by GSWC). These wells are located up gradient of the UST site based on Fall 2012 groundwater elevation contours in the deeper principal aquifers of the Central Basin, which were obtained from the Water Replenishment District of Southern California.
- The uppermost perforations in these wells occur at 1,332, 550, 580, and 576 feet below ground surface (bgs), respectively (approximately 1,188, 406, 436, and 433 feet below mean sea level, respectively).

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- According to the “Hazardous Material Underground Storage Closure/Site Assessment Report” correspondence dated December 4th, 2001, additional closure requirements were requested for the site, including a request to: “Define the vertical and lateral extent of contamination.” The response(s) to this request is/are not available on the GeoTracker website for the subject UST site. Because it’s not clear whether impacts to groundwater have been evaluated at the site, it is unclear as to whether USTs at the site may have potentially impacted aquifers used as a source for drinking water.

Should you have any questions, please contact me at (714) 535-7711, extension 314.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Toby B. Moore', with a long horizontal flourish extending to the right.

Toby B. Moore, PhD
Water Resources Manager and Chief Hydrogeologist

cc: George Lockwood, State Water Resources Control Board
Yue Rong, State Water Resources Control Board – Los Angeles
Matthew Cohen, State Water Resources Control Board – Los Angeles
John Awujo, Los Angeles County Department of Public Works
David Chang, GSWC
Kate Nutting, GSWC
Lisa Miller, GSWC
Phuong Ly, Water Replenishment District of Southern California