



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 W. Ocean Boulevard Long Beach, CA 90802 (562) 570-6194 FAX (562) 570-6068

May 6, 2010

CHAIR AND PLANNING COMMISSIONERS
City of Long Beach
California

RECOMMENDATION:

Adopt Resolution certifying Mitigated Negative Declaration 15-09 and approve a Local Coastal Development Permit to remove five above-ground storage tanks and associated above-ground pipelines at 400 Studebaker Road. (District 3)

APPLICANT: Studebaker LB, LLC
c/o Tom Dean
3626 Long Beach Boulevard
Long Beach, CA 90807
(Application No. 0911-04 MND No. 15-09)

DISCUSSION

This project was continued from the Planning Commission meeting of February 18, 2010. After a lengthy discussion relating to environmental concerns regarding removal of the tanks, the Planning Commission voted three to two to continue the item. The purpose of the continuance was to allow the applicant to obtain a certified work plan from the California Department of Toxic Substances Control (DTSC) and an engineering analysis to determine the location of the interlocking Plains Petroleum pipeline system running through the site. The applicant has submitted an approved work plan from the Department of Toxic Substances Control (Exhibit A – DTSC letter of March 30, 2010, Waterstone Environmental, Inc. revised work plan dated March 26, 2010 and Plains Petroleum tank map). Soil sampling and analysis will take place after the tanks have been removed.

The project site is a rectangular shaped 17.8-acre parcel located on the east side of Studebaker Road at the Loynes Drive and Studebaker Road intersection (Exhibit B - Location Map). Adjacent land uses include the Alamitos Generating Station to the north and east, a water channel and industrial uses to the south, and the Los Cerritos Wetlands and residential neighborhood to the west across Studebaker Road.

The project site contains six above-ground storage tanks (ASTs), conveyance pipelines, and containment berms. The four large ASTs, Tank Nos. 1,2,3, and 4, originally stored Fuel Oil No. 6, which formerly fueled the adjacent power plant. The capacity of these tanks is between 5,888,000 and 9,400,000 gallons. The four large tanks are approximately 40 feet high and 160 to 200 feet in diameter. The remaining smaller ASTs, Cutter Tanks A and B,

have been used to store distilled oil. The smaller tanks have a capacity of 840,000 to 1,220,000 gallons with a diameter of approximately 60 feet. All tanks have a berm system to contain any tank spills. At present, the only operating facilities on the project are Cutter Tank A, an operations shed, and conveyance pipelines, all of which are maintained by Plains Petroleum. The remainder of the project site lies dormant (Exhibit C - Plans and Photographs).

The applicant, Studebaker LB, LLC, intends to remove the four large ASTs (Tank Nos. 1-4), Cutter Tank B, and above-ground pipelines associated with these five ASTs. Cutter Tank A is still in use and will remain.

Prior to issuance of a demolition permit the applicant is required to obtain approval from a number of city, state and regional government agencies to ensure the safe removal and disposal of any hazardous materials. Additionally, these agencies will ensure adequate safeguards are in place to prevent adverse effects to the surrounding area during the demolition process such as dust control and proper disposal of materials. Approval of the following plans shall be required from these agencies:

- Regional Water Quality Control Board (RWQCB) - File a Notice for Stormwater Discharges and prepare a Stormwater Pollution Prevention Plan (SWPPP).
- South Coast Air Quality Management District (SCAQMD) - Notification of demolition and asbestos abatement pursuant to SCAQMD Rule 1403 and follow fugitive dust requirements pursuant to SCAQMD Rule 403.
- Long Beach Certified Unified Program Agency (CUPA) - Long Beach Health Department (LBHD) and the Long Beach Fire Department (LBFD) - Above-ground storage tank (AST) demolition work plan.
- Department of Toxic Substances and Control (DTSC) - Corrective Actions Consent Agreement between the applicant and DTSC.

A letter from Rincon Consultants, Inc. with a list of agency permits and approvals is attached (Exhibit D - Letter and Permit Matrix).

Demolition of the five tanks will take approximately six weeks to complete. Two tanks and associated piping will be demolished at one time before moving on to the other tanks. The tanks will be demolished and stockpiled in bins until taken to a landfill. For the entire project, hauling the tank panels will use approximately 18 trucks for up to two days, while hauling the scrap metal will use up to 40 trucks over a three day period. Hauling will occur when all of the bins are loaded and will not occur during tank demolition. Pick-up of demolished materials will be phased during non-peak hours to reduce potential traffic impacts. Trucks will enter and exit the project site through an access gate near the intersection of Loynes Drive and Studebaker Road.

A Local Coastal Development Permit is required for any development in the coastal zone. Development includes demolition; thus, the project is subject to a Local Coastal Development Permit. The proposed project is consistent with the goals, objectives and provisions of the Local Coastal Development Plan (Exhibit E - Findings and Conditions of Approval). This parcel was also part of a lot line adjustment approved on July 7, 1997, by the City's Zoning

Administrator. There is a dispute with the California Coastal Commission regarding the legality of the Lot Line Adjustment, as there was not a Local Coastal Development Permit processed concurrently with the request. A discussion with the California Coastal Commission staff indicates that this is not an issue for the tank demolition. However, any future development of the site will require approval of a Local Coastal Development Permit and Lot Line Adjustment.

The revised Initial Study/Mitigated Negative Declaration 15-09 (MND 15-09) has determined that no significant impacts would occur as a result of this project. Although project impacts would be less than significant, MND 15-09 identifies two mitigation measures that would further reduce the level of potential impacts: (1) advance notice is required to local schools at least seven days prior to commencement of demolition activities, and (2) traffic safety measures during truck hauling to reduce potential impacts to traffic on Studebaker Road. These two conditions are found in the Mitigation Monitoring Plan (Exhibit F - Mitigated Negative Declaration 15-09).

PUBLIC HEARING NOTICE

Notices of public hearing were distributed on April 16, 2010, in accordance with Chapter 21.21 (Administrative Procedures) of the Zoning Regulations. In addition, a public notice was mailed to College Park Estates, Bixby Village Community Association, University Park Estates Neighborhood Association, Belmont Shore Mobile Estates, and Island Village Homeowners Association. As of the date of preparation of this report, no responses to the public hearing notice were received.

ENVIRONMENTAL REVIEW

The original MND 15-09 public comment period was from December 1 to 31, 2009. The project proposal at that time included a dry vehicle storage lot land use for the project site after completion of demolition activities. The applicant has since withdrawn the dry vehicle storage lot proposal. A revised MND 15-09 was then prepared for the tank demolition proposal only, and a public comment period from January 14 to February 16, 2010, was provided for this revised MND 15-09. The Mitigated Negative Declaration was mailed to all applicable government agencies, including the Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB), for their review and comment.

In accordance with the guidelines for implementation of the California Environmental Quality Act (CEQA), MND No. 15-09 was prepared and is attached for your review. In addition, comment letters received from both public comment periods on the Mitigated Negative Declaration are attached for your review (Exhibit G - Comment letters).

Respectfully submitted,


REGINALD I. HARRISON *for*
INTERIM DIRECTOR OF DEVELOPMENT SERVICES

Chair and Planning Commissioners

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RH:DB:lf

Exhibit A - DTSC Letter, Waterhouse Revised Work Plan, Plains Petroleum Tank Map

Exhibit B - Location Map

Exhibit C - Plans & Photographs

Exhibit D - Rincon Letter and Permit Matrix

Exhibit E - Findings and Conditions of Approval

Exhibit F - Mitigated Negative Declaration No. 15-09 and Notice of Intent

Exhibit G - Comment Letters on MND No. 15-09

Resolution



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311



Arnold Schwarzenegger
Governor

March 30, 2010

Mr. Kenneth A. Ehrlich of
JMBM | Jeffer, Mangels, Butler & Marmaro LLP
1900 Avenue of the Stars,
7th Floor Los Angeles, California 90067

RE: Final (Revised) Workplan for Soil and Groundwater Sampling Post Removal of Five Aboveground Storage Tanks (ASTs) and Associated Piping [Adjacent] Alamitos Generating Station, 400 Studebaker Road, Long Beach, CA

Mr. Ehrlich,

The Department of Toxic Substances Control (DTSC) has reviewed the referenced work plan. Initial comments to the draft workplan were provided to the consultant via email (03-25-10) and appear to have been addressed and/or adequately discussed in the revised document. As such, **the current scope of work is approvable as an initial phase of the RCRA Facility Investigation for the site.** DTSC will arrange a post AGT removal meeting with the landowner and/or representative to discuss an adequate time frame toward continued environmental investigation for the remainder of the site.

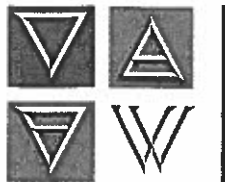
If you have any further questions, please contact me directly at (818) 717-6599 or cbucklin@dtsc.ca.gov.

Sincerely,

Christine Bucklin, P.G.
Senior Engineering Geologist
Brownfields & Environmental Restoration Program

Electronic CC:

Nancy Beresky, Waterstone Environmental Inc.
Carmen Piro, City of Long Beach
Timothy Buzbee, City of Long Beach Fire Department
Derek Burnham, City of Long Beach
Jill Griffiths, City of Long Beach
Steve Maghy, AES (Generating Station)



WATERSTONE ENVIRONMENTAL, INC.

2936 East Coronado Street * Anaheim, CA 92806
714-414-1122 * Fax: 714-414-1166
E-Mail: nberesky@waterstone-env.com

April 22, 2010

FINAL via eMAIL TO ALL PARTIES

Carmen Piro
Haz Mat Specialist
City of Long Beach
Department of Health and Human Services
Environmental Health, Hazardous Materials Division
CUPA (Certified Unified Program Agency)
2525 Grand Avenue, Room 222
Long Beach, CA 90815

Tim Buzbee
Plans Reviewer/Inspector
Long Beach Fire Department
3205 Lakewood Blvd.
Long Beach, CA 90808

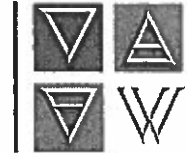
Christine Bucklin, P.G.
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, CA 91311

RE: Revised Workplan for Soil and Groundwater Sampling Post Removal of Five Aboveground Storage Tanks (ASTs) and Associated Piping; Alamitos Generating Station, 400 Studebaker Road, Long Beach, CA

Dear Ms. Piro, Mr. Buzbee and Ms. Bucklin:

This Revised Workplan for Soil and Groundwater Sampling Post Removal of Aboveground Storage Tanks (Revised Workplan) is a revision and update of the workplan of the same name dated March 26, 2010 incorporating email comments provided to Nancy Beresky from Tim Buzbee of the LBFD dated April 19, 2010. This Revised Workplan incorporates comments received from the following agencies:

- City of Long Beach Department of Health and Human Services (LBDHHS). Comments were provided in an email to Nancy Beresky from Carmen Piro dated March 19, 2010 and to Tim Buzbee from Carmen Piro dated March 17, 2010.
- City of Long Beach Fire Department (LBFD) an email from Ms. Piro dated March 19, 2010. Comments provided in an email to Nancy Beresky from Carmen Piro dated March 19, 2010. Email comments provided to Nancy Beresky from Tim Buzbee of the LBFD dated April 19, 2010.



- State of California Department of Toxic Substances Control (DTSC). Comments were provided in an email to Nancy Beresky from Christine Bucklin dated March 25, 2010.

Attachment A provides a copy of the emails with the Oversight Agency comments and Waterstone's replies.

Introduction

Waterstone Environmental, Inc. (Waterstone) has been retained by Studebaker-LB, LLC to prepare this Revised Workplan describing the collection and analysis of soil and groundwater samples at the Alamitos Generating Station located at 400 Studebaker Road, Long Beach, CA (Subject Property, see Figure 1). The proposed scope of work includes sample collection from beneath five unused aboveground storage tanks (ASTs) and associated piping after these features are removed from the Subject Property as required by the LBDHHS and the LBFD (City Oversight Agencies). The protocols to be followed are specifically as outlined in the City of Long Beach "Post Tank Removal Guidelines" (August 4, 2008) and are paraphrased in this Revised Workplan where applicable.

Planned Tank Removal Activities

Post tank removal sampling work is to be performed after tank removal activities. Analysis results are to be included as part of the Tank Removal Report required by the City Oversight Agencies.

The tank removal contractor contact information is as follows:

General Contractor (GC):

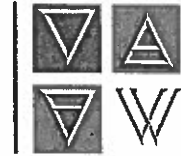
Eric Keller
President
Kelty Co.
2780 Dawson Avenue
Signal Hill CA 90755
Phone: (562) 989-3200
Fax: (562) 989-5506
E-mail: ekeller@keltyco.com

Demolition subcontractor to GC:

Rob Shaffer and Gregg Miller
Miller Environmental, Inc.
2210 South Dupont Drive
Anaheim, CA 92806
Phone: (714) 385-0099
Cell: (949) 338-5754 (R.Shaffer)
www.millerenvironmental.com

Waterstone will work in conjunction with the demolition contractor to ensure that all procedures and tasks of this Revised Workplan are completed as approved by the oversight agencies. The schedule for the demolition activities is as follows:

- The demolition start date is to be determined.
- Tanks 3 and 4 and associated piping: 5 days
- Tanks 1 and 2 and associated piping: 5 days
- Cutter stock tank and associated piping: 5 days.



The duration of tank removal activities described above is taken from the October 12, 2009 Tank Demolition Workplan prepared by Miller Environmental, Inc.

RCRA Facility Investigation Workplan

This workplan is prepared to comply with the City Oversight Agencies' requirements and also comprise a portion of the first phase of the full site assessment that is required for the Subject Property by the DTSC. Studebaker-LB, LLC has previously submitted to DTSC a "RCRA Facility Investigation Workplan" dated May 11, 2007 prepared by ENVIRON International Corporation (RFI Workplan). The RFI Workplan was subsequently approved by the DTSC.

Although the planned future site use has changed since the time the RFI Workplan was prepared and approved by DTSC, sections of the RFI Workplan are still applicable to any sampling that may be performed on the Subject Property. Where appropriate and applicable, this Post AST Removal Workplan incorporates by reference sections from the RFI workplan to avoid redundancy in preparation and review time for all involved parties.

This Revised Workplan addresses sampling that will be performed in the portion of the Subject Property referenced as Area of Concern #5 (AOC 5) in the RFI Workplan as shown on Figure 2. This is the area of the five ASTs and associated piping that will be removed.

Background information for the Subject Property has been previously presented in the RFI Workplan in Section 1.0 and Section 4.0. Previous site investigations performed at the Subject Property are presented in the RFI Workplan in Sections 4.7, 4.8 and Appendix D. Environmental Setting information is provided in Section 5.0 of the RFI Workplan. A conceptual site model for the Subject Property is provided in Section 6.0 of the RFI Workplan.

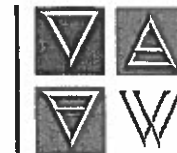
It is Waterstone's intention to use the DTSC-approved Health and Safety Plan and applicable components of the Quality Assurance Project Plan (QAPP) provided in the RFI Workplan.

Purpose

The purpose of the proposed investigation is to provide information regarding the nature and extent of possible impact to the soil and groundwater that may have been caused by the historical storage of chemical compounds in the ASTs. The primary purpose of this investigation is the following:

- To comply with the Oversight Agencies' "Post Tank Removal Guidelines" (August 4, 2008).

Additional purposes are as follows:



- To preliminarily determine the extent of soil removal that may be required beneath the ASTs and the likely disposition of that removed material.
- To provide sampling procedures, laboratory analysis and results reporting and quality assurance/quality control protocols that are compliant with the existing Corrective Action Consent Agreement (Docket HWCA P3-06/07-002) dated September 1, 2006 between the DTSC and Studebaker-LB, LLC.
- To adopt all the procedures that are appropriate for and applicable to the sampling proposed herein that were previously approved by the DTSC in the RFI Workplan. Applicable sections of the RFI Workplan will be referenced in the appropriate portions of the scope of work described below.

Chemicals of Potential Concern

Chemicals of Potential Concern (COPC) are discussed in Section 6.2 of the RFI Workplan. COPCs are summarized here to facilitate agency review of the proposed chemical analysis for the Post AST Sampling Workplan scope of work.

Figure 2 shows the five ASTs that are the subject of this Post AST Removal Workplan. The larger tanks, Tanks 1 through 4, were all the subject of earlier investigations between 1990 and 1995. These earlier investigations served to identify COPCs for the Subject Property. It is reported in the RFI Workplan that heavy-range hydrocarbons such as Bunker C or Fuel Oil No. 6 were stored in Tanks 1 through 4 and diesel-range hydrocarbons were stored in the smaller Cutter Stock Tank (CST) located in the middle of Tanks 1 through 4.

Scope of Work

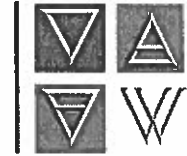
For brevity's sake, the applicable sections of the RFI Workplan will be included as part of this workplan by reference rather than paraphrased. Waterstone has developed the following tasks to achieve the stated project objectives:

- Task 1.0 - Prefield Activities
- Task 2.0 – Soil and Groundwater Sample Collection and Analysis
- Task 3.0 – Data Validation and Report Preparation.

Each of these tasks is described in detail below.

Task 1 - Prefield Activities

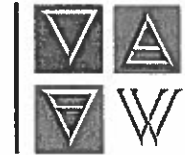
Prior to implementation of field work a number of activities will be performed. These include:



- Prior to demolition work, discuss with the demolition subcontractor schedule, timing, and situations where Waterstone should be called out during demo.
- Perform a job startup meeting with project team to discuss:
 - scope of work
 - Health and Safety Plan to be used (from RFI Workplan, Appendix C)
 - Quality Assurance Project Plan to be used (from RFI Workplan, Appendix A)
 - notification of appropriate personnel prior to sampling
 - designate subcontractors and discuss subcontracts needed
 - copies of boring permits onsite
 - health and safety issues and personal protective equipment (PPE)
 - field monitoring issues
 - need to set up staging area for sampling, decontamination
 - decontamination procedures
 - onsite communication
 - hospital route and first aid.
- Upon authorization to perform the work, procure permits for soil borings from the City of Long Beach Department of Public Works. Permits must be issued prior to performing field work and permit copies must be in the field with the field scientist.
- Arrange site access with Studebaker-LB, LLC.
- Prepare subcontracts for designated subcontractors.
- Confirm with Studebaker-LB, LLC that there are no utilities present beneath the ASTs and obtain written confirmation that a subcontracted utility clearance is not needed

OR

- Perform a utility clearance using a subcontracted geophysical survey contractor including:
 - evaluating site drawings for underground lines and/or
 - interviewing knowledgeable personnel re: underground lines
 - use underground sensing equipment to detect potential underground lines or other obstructions and adjust boring locations accordingly.
- Perform a field visit to mark boring locations.
- As per the Post Tank Removal Guidelines, at least 7 calendar days before sampling, notify the City of Long Beach Fire Department to have a Fire Inspector witness soil sampling activities. Inspections are scheduled based on the Inspector's availability. Requests must be made a minimum of 72 hours in advance. The LBFD will pursue every opportunity to honor requests in a timely fashion.
- At least 7 calendar days before sampling, notify Ms. Chris Bucklin, DTSC of the schedule for soil sampling activities.



- Contact Underground Service Alert 48 hours prior to sampling.
- Per the soil boring permit requirements, contact a City of Long Beach Public Works Inspector 48 hours prior to drilling so inspection can be performed prior to sealing the locations.
- Calibrate and prepare field equipment necessary to comply with the Health and Safety Plan and Workplan. Per LBFD requirements, continuous air monitoring will be conducted during soil sampling and similar operations. Air monitoring equipment will have a current calibration sticker affixed that shows the instrument have been calibrated within the last 90 days.

Task 2 – Soil and Groundwater Sample Collection and Analysis

Beneath the removed tanks, nine (9) soil boring locations are proposed as shown on Figure 2 and described as follows:

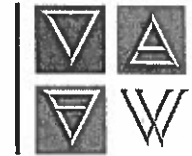
- Two locations (8 total) each under former ASTs 1, 2, 3, and 4.
- One location (1 total) beneath the former cutter stock tank, the much smaller tank located in the center of the four large tanks (see Figure 2, the tank is marked “CST”).

Additional boring locations (2 more beneath each of the 5 tanks) was requested by DTSC and will be performed at a later date as part of the site-wide RFI Site Investigation. In addition, DTSC requested that samples be collected from 6 inches below the gravel base (if present). Because additional work in these areas will be required to complete the RFI workplan, the proposed sampling will comply with the requirement that sample collection be performed 2' and 4' below pipe or grade as required by the Guidance and sample collection at 6" will be performed at a later date as part of the RFI if required. Part of the reason to perform the 4' instead of the 6" sampling is it is likely that the topmost soil will eventually be excavated and disposed of, therefore data from this 6" horizon is not as useful as the data from 4'.

Beneath the removed pipelines, samples will be collected from 2 and 4 feet at locations spaced 20 feet apart as measured in the field and at all fittings locations. Soil Sampling locations (23 are estimated) are shown on Figures 3, 4, and 5.

At this time, there is no plan to remove, disturb, or sample within AOCs 1 through 4 as shown on Figure 2. Access to the tanks that are to be removed will be performed via existing ramps as shown on Figure 6.

There is no existing ramp into the Cutter Stock Tank area. The plan for accessing the Cutter Stock Tank is to use an all terrain vehicle-mounted manlift to access the tank for demolition activities. If necessary, the berm may be slightly ramped to facilitate machinery entry. Based on previous sampling performed, the south side of the berm is the preferred ramping area. Soil samples from 5-feet and 10-feet in depth were collected from the berm soils, analyzed by GeoSoils, Inc., and reported in a document dated December 8, 2009. Samples from this location (AOC 5- Berm B11) indicate that no volatile organic compounds or total petroleum



hydrocarbons were detected. Metals analysis for three samples collected at AOC 5-Berm 11 indicate that all are within background concentrations and the 0.5-foot sample is slightly elevated at 16 parts per million (ppm) compared to the 5 and 10 foot samples which are less than 8 ppm.

Boring locations may be adjusted in the field during the staking of the locations performed in the pre-field activities described above. Locations will be placed in the most visibly contaminated areas at each former AST location. Given the nature of the COPCs, soil or gravel from beneath the former ASTs that is impacted by formerly-stored heavy oils should be immediately observable based on staining and odor observations. Each boring location will be advanced to groundwater depth which is estimated to be 15 feet below ground surface (bgs).

To satisfy the Oversight Agency Post Tank Removal Guidelines, undisturbed soil samples will be collected from each location at depths of 2 feet and 4 feet beneath the soil surface and will be witnessed by a Long Beach Fire Department Inspector.

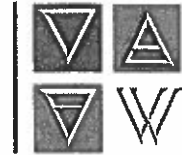
Five groundwater samples will be collected. A hydropunch tool or equivalent will be used to draw a groundwater sample from the first 3-5 feet of encountered groundwater at the northernmost (upgradient) locations sampled at Tanks 1 and 3 and at the southernmost (downgradient) locations sampled at Tanks 2 and 4. The fifth groundwater sample will be collected from beneath the Cutter Stock Tank as requested by DTSC.

All sampling protocols are detailed in Attachment B and will be compliant with the City Oversight Agencies' requirements. To comply with the LBFD comments on the initial Post AST Removal Sampling Workplan, soil sampling shall be witnessed in person by a California Professional Geologist, with a current license. In addition, soil samples will be sealed by the LBFD Inspector at the time they are taken, prior to placing them in the ice chest.

Soil samples will be collected in brass or stainless tubes or acetate sleeves and sub-sampled, as requested by DTSC, with ESS Lock N' Load Handle and Syringe or equivalent samplers for volatile organic compound (VOC) analysis using EPA Method 5035 specified in USEPA SW-846, version (April 1998) or the updated version if one becomes available prior to sampling. These samplers obtain core samples using a volumetric sampling system designed to collect, store and deliver a soil sample and provide sample preservation and minimization of organic losses.

All collected soil samples will be analyzed on a minimum 1-week turnaround time basis by the following methods required by the LBDHHS Post Tank Removal Guidelines for Aboveground Petroleum Tanks:

- Diesel and heavy range total petroleum hydrocarbons (TPH) using carbon chain identification for C6-C32 by EPA 8015M
- VOCs by EPA Method 5035/8260B (from Encore™ sub samplers)
- CAM Metals



The laboratory that will perform the analysis is Test America Laboratories of Irvine, CA, a State-certified hazardous waste-testing laboratory.

Per the LBDHHS Post Tank Removal Guidelines, the following are required method detection limits (MDL) for the listed analyses:

REQUIRED MDL

ANALYTE	ANALYTICAL METHOD	SOIL (µg/kg)	WATER (µg/L)
BTEX	EPA Method 8260B (8021B)	1	0.5
TPH-C6 to C40	EPA Method 8015M (2 CC Increments)	1,000	500

Per DTSC request, the LUST GC/FID method will not be used and EPA Method 8015M will be used in its place. EPA Method 8015M is considered a more precise and accurate method and will be necessary for the data to be usable in a future risk assessment to be performed as part of the DTSC-required RFI. To facilitate future risk assessment calculations, detected compounds will be reported in 2 carbon chain increments (C6-C7, C8-C-C10, etc.) as discussed earlier with DTSC.

The Guidelines also require the reporting of any concentration detected between the method detection limit (MDL) and estimated quantification limit (EQL) or reporting limit (RL) in a numerical value with a "J" flag indicator. All "Non-Detect" (ND) shall be reported in a format with "< (numerical MDL)."

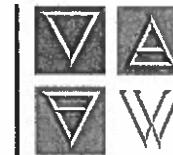
Quality Assurance/Quality Control Samples will be collected according to the QAPP provided in Appendix A of the RFI Workplan. Nine (9) borings will be sampled at 2 depths for a total of 18 samples plus 23 piping locations at two depths for a grand total of 64 samples. One duplicate sample will be collected for every 10 samples collected, therefore, 6 duplicate samples will be collected.

Trip blanks will be placed in every cooler. An equipment blank will be collected one time per day to verify decontamination procedures. In addition, a trip and equipment blank will be analyzed to evaluate the water sampling shipment and decontamination procedure.

Soil Removal Procedures

Because the removal activities are for ASTs, it is not anticipated that soil excavation will occur as is the case with removal of underground storage tanks. However, the City Oversight Agencies have specific protocols for soil handling if excavation does occur. If soil removal is required the Post Tank Removal Guidelines will be followed as paraphrased below:

- All excavated soil must be retained on site until the LBDHHS has reviewed the Soil Sampling Report. Excavated contaminated soil must be handled in compliance with the South Coast Air Quality Management District's Rule 1166 regarding volatile organic compound (VOC) emissions from contaminated soil.



- All soil excavated during removal of an underground storage tank is considered contaminated until proven otherwise by laboratory analysis performed by a California certified environmental laboratory. Leaking underground fuel tank (LUFT) contaminated soil, once it has been excavated, becomes waste. The contaminated site and the excavated soil must be treated under the authority of the Porter Cologne Water Quality Control Act (Water Code). The soil to be placed into a tank excavation must be either the excavated soil that has been deemed acceptable or remediated to the satisfaction of the LBDHHS, or clean imported soil, as proven by laboratory analysis by a California certified environmental laboratory. The LBDHHS does not stipulate how long an excavation can remain open as long as precautions have been taken by the responsible party to assure the avoidance of any potential public danger.
- All stockpiles shall be placed on heavy duty plastic and covered with heavy duty, continuous plastic sheet(s), joined at the seams and securely anchored to prevent any exposure of soil to the atmosphere.
- The site shall be temporarily fenced to a height of six feet.
- If an excavation is left in an unsafe condition, the property will be returned to a safe condition by the City of Long Beach and all costs incurred will be charged to the owner/permittee.

Task 3 – Data Validation and Report Preparation

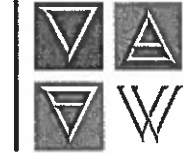
Waterstone will prepare a report compliant with LBDHHS reporting requirements summarizing the following project information:

- Project Objectives and Background
- A Summary of the Scope of Work Implemented
- Sampling Methodologies
- Analytical Test Results for Collected Soil Samples
- Data Validation per the applicable components of the RFI Workplan QAPP
- Discussion Of Soil Sample Test Results
- Conclusions.

The report will also contain tables and figures summarizing analytical test data and sampling locations, respectively. Laboratory reports will be provided as an appendix to the report.

Per the LBDHHS guidelines, the following are required:

- The required Soil Sampling Report must be submitted to LBDHHS within 14 days of sampling. This Soil Sampling Report must have the ORIGINAL copies of the chain of custody and laboratory data.



- The Soil Sampling Report is a required component of the Tank Removal Report. Within 30 days of tank removal, a Tank Removal Report and a fee of \$239 for review must be mailed to the LBDHHS on Grand Avenue in Long Beach.
- At the same time, a copy of the report must be mailed to the LBFD, 3205 Lakewood Boulevard, Long Beach, CA 90808.

Waterstone will work in conjunction with the tank demolition contractor to ensure that the reporting deadlines are met and that the specific report requirements as outlined in detail in the Post Tank Removal Guidelines are followed. If a variance to this schedule becomes necessary, Waterstone will discuss this with the City Oversight Agencies and determine another deadline that can be arranged.

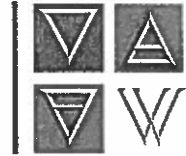
The final report will be submitted as described herein and will also be submitted to Christine Bucklin at DTSC.

POST TANK REMOVAL SOIL SAMPLING SCHEDULE

In its review of the original Post AST Removal Workplan, LBFD made the following comment: *“Contractor doing the demolition of the tanks shall be required to gain approvals that have already been begun with L.B.F.D. Their documents shall reference the soil sampling protocol, so that it will be clearly understood.”* This requirement has been communicated to Mr. Eric Keller of Kelty Co. as the General Contractor to pass to his demolition subcontractor.

LBFD comments requested that a statement be included here stating the following: *“Demolition plan review shall continue once a re-submittal occurs to LBFD which includes the approved version of this Revised Workplan. All items previously noted as corrections shall be addressed per standard protocol of LBFD Tank Section. All responses on the tank removal permit file (FTNK 3395) shall be addressed in writing as specified on prior corrections. Failure to follow this may delay project start date.”*

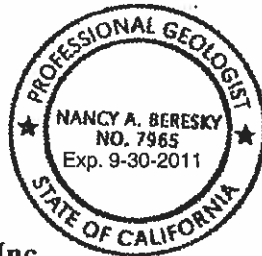
Waterstone will be in the field to perform soil sampling within 3-5 business days of the completion of tank removal activities. Soil and groundwater sampling is expected to take 1 -2 days. Laboratory analysis will take 5-7 days. The final report will take 5-7 days to complete. Report submittal will occur within 14 days of the completion of soil sampling activities.



Please call Nancy Beresky at 714-414-1122 if you have any questions.

Sincerely,

Nancy A. Beresky, P.G. 7965
Principal Hydrogeologist
Waterstone Environmental, Inc.



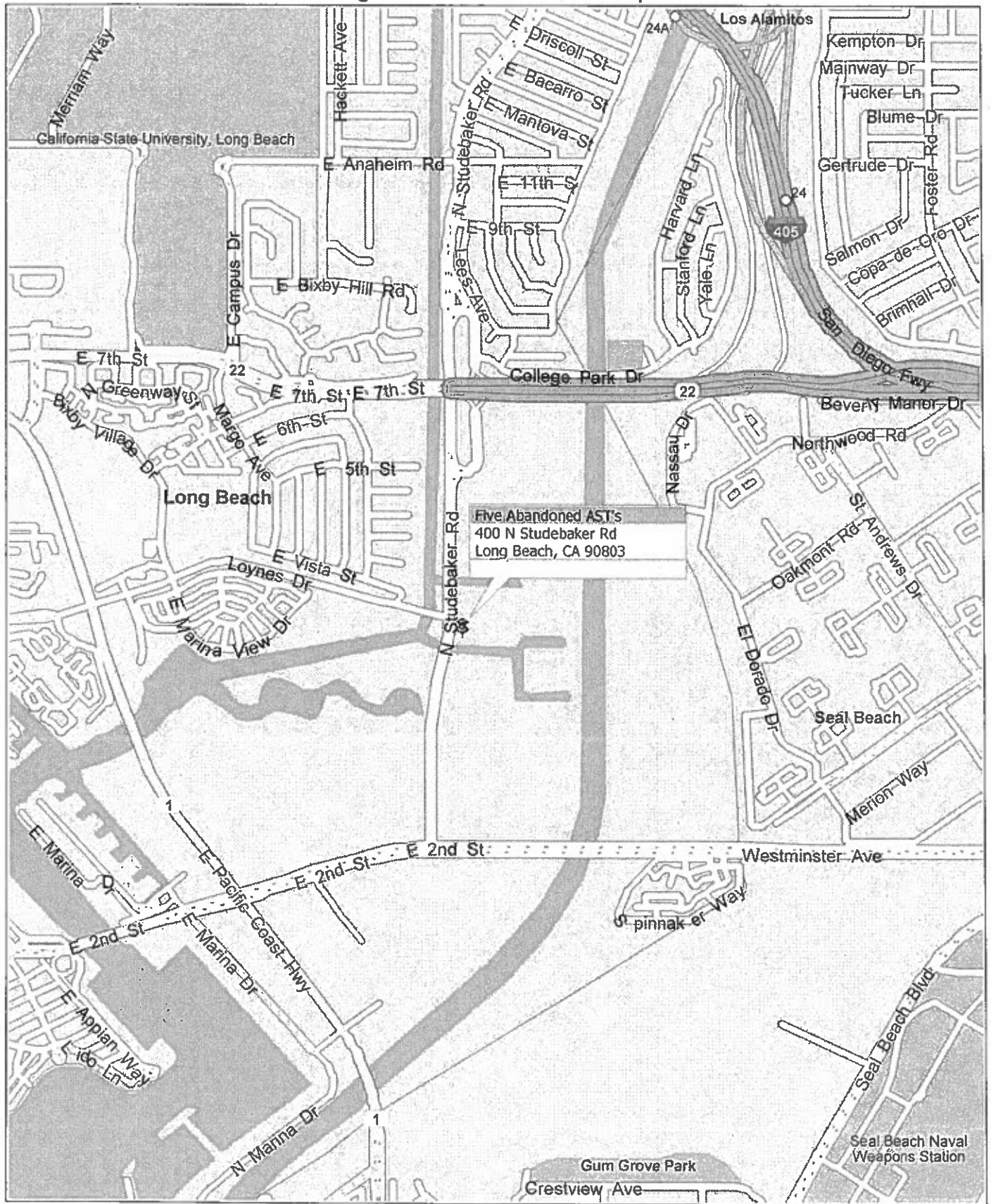
Everett Ferguson, Jr., PG, CHG
Supervising Hydrogeologist
Waterstone Environmental, Inc.

- Attachments: Figure 1-Site Location Map
Figure 2 – Proposed Aboveground Storage Tank Sampling Locations
Figures 3, 4, 5 – Proposed Piping Sampling Locations
Figure 6 – Access Routes to Tanks

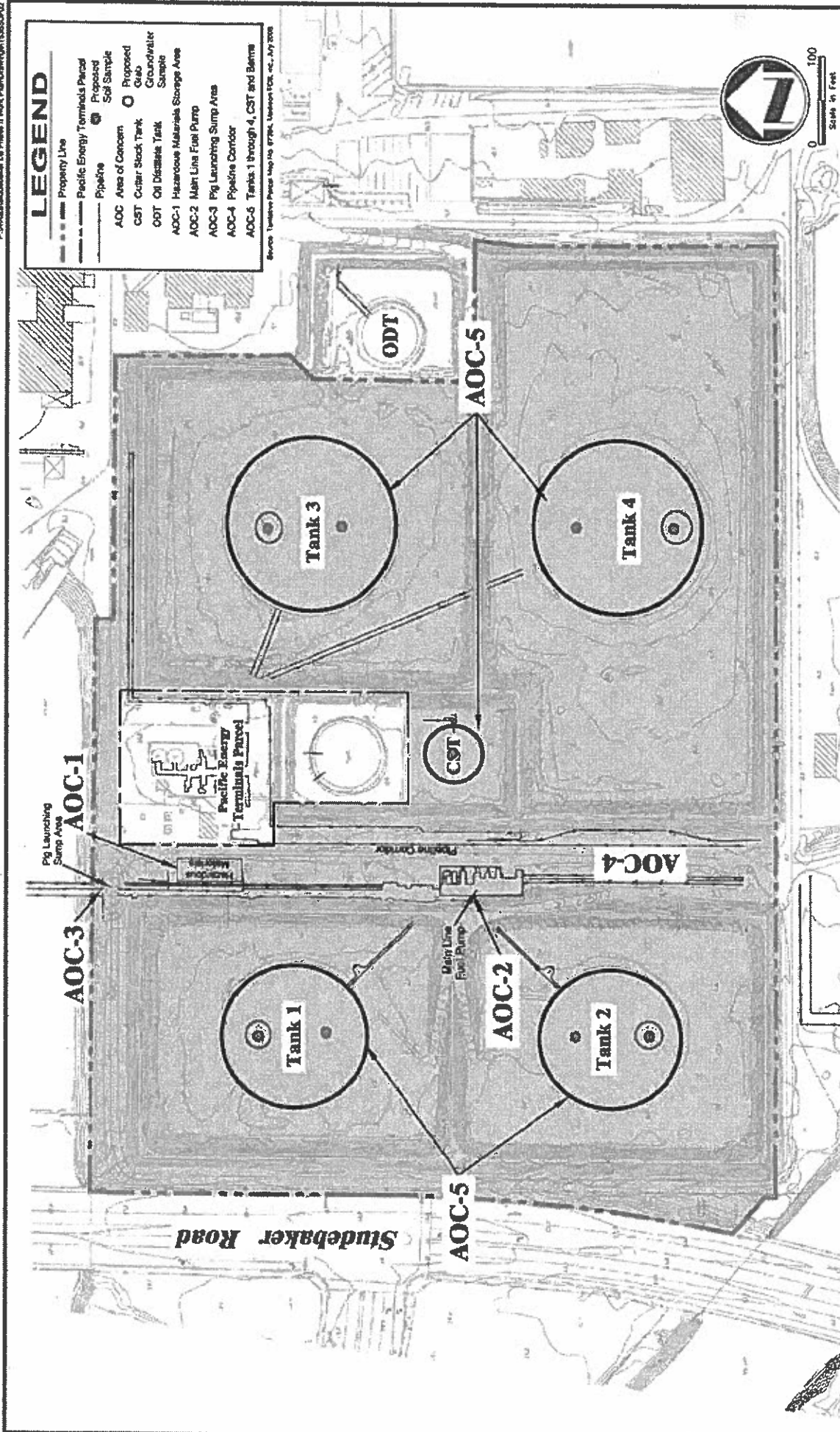
- Attachment A –Agency Comments and Replies
Attachment B - Sampling Protocols

cc: Kenneth Erlich, Esq.; Jeffer, Mangels, Butler & Marmaro, LLP
Derek Burnham: City of Long Beach
Jill Griffiths: City of Long Beach

Figure 1 - Site Location Map



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PROPOSED ABOVEGROUND STORAGE TANK SAMPLING LOCATIONS

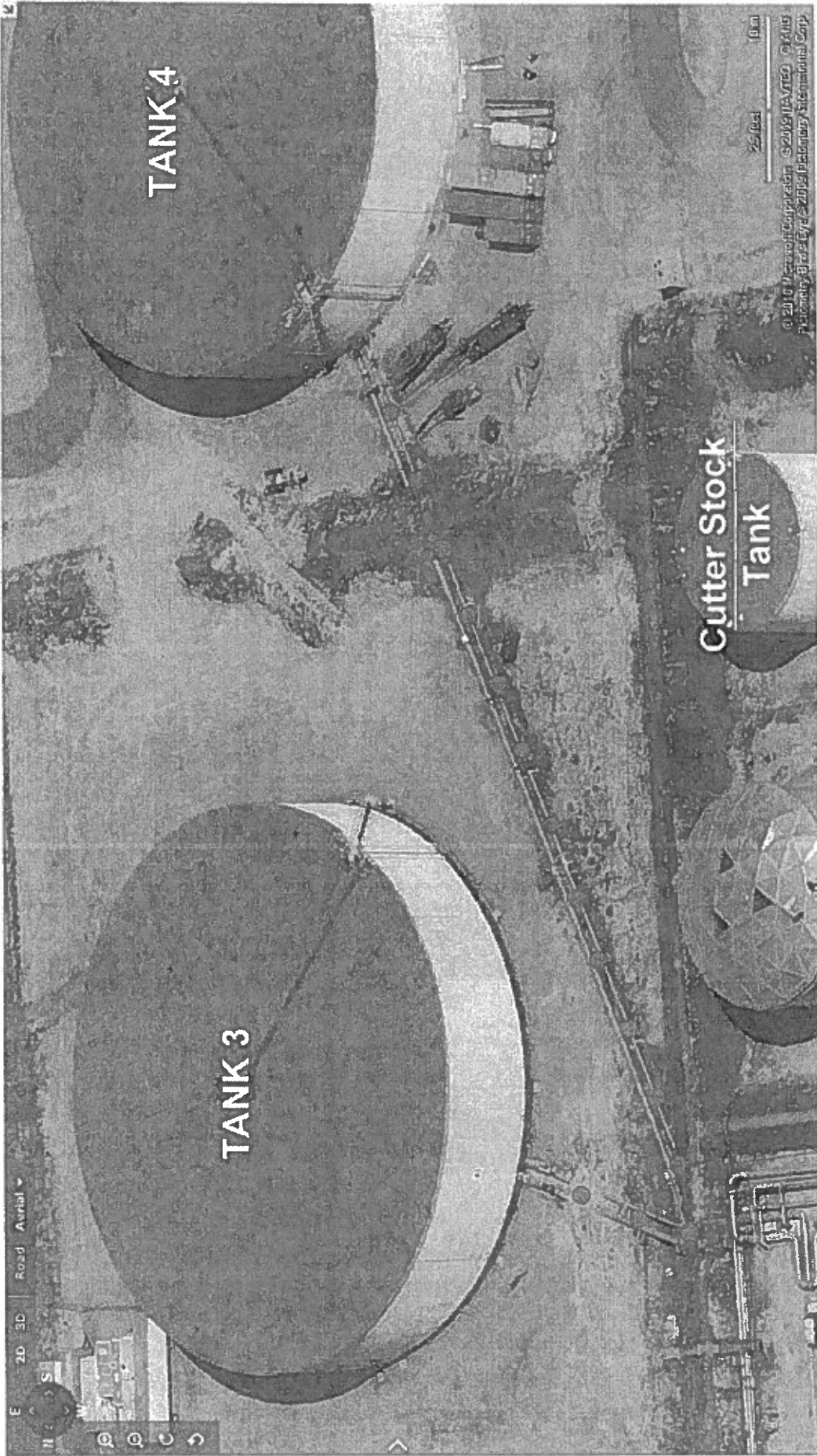
400 Studebaker Road
 Long Beach, California

Base map from Figure 2
 ENVIRO, May 11, 2007,
 "RCRA Facility Investigation Workplan"



- Approximate location and number of sampling locations. Locations will be measured in the field at 20-foot intervals as required by the City of Long Beach Post Tank Removal Guidelines.

Figure 3
Product Pipeline Sampling Plan
Tanks 1 and 2
400 Studebaker Rd.
Long Beach, CA



Approximate location and number of sampling locations. Locations will be measured in the field at 20-foot intervals as required by the City of Long Beach Post Tank Removal Guidelines

Figure 4
 Product Pipeline Sampling Plan
 Tanks 3 and 4
 400 Studebaker Rd.
 Long Beach, CA

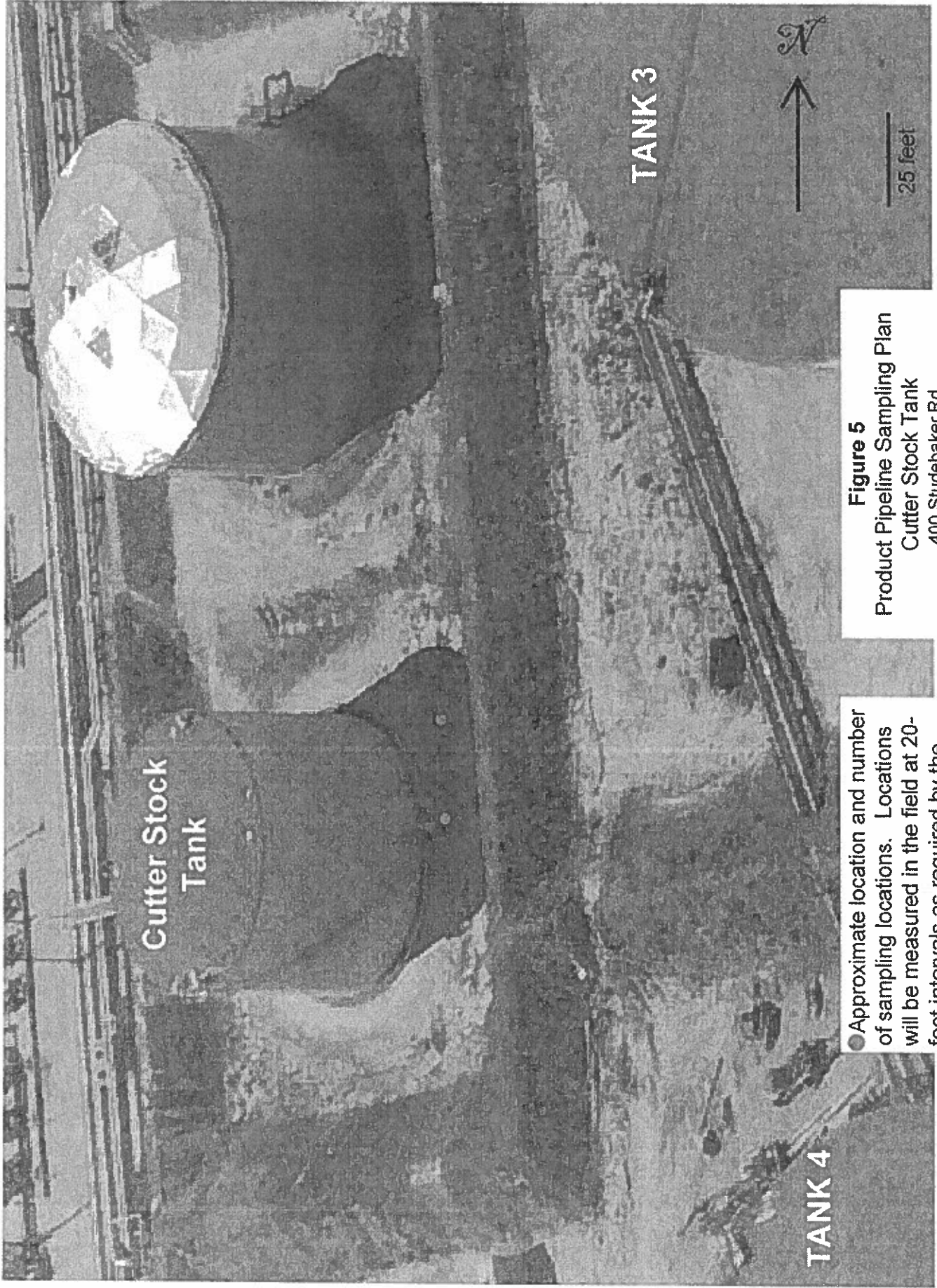


Figure 5
Product Pipeline Sampling Plan
Cutter Stock Tank
400 Studebaker Rd.
Long Beach, CA

● Approximate location and number of sampling locations. Locations will be measured in the field at 20-foot intervals as required by the City of Long Beach Post Tank Removal Guidelines

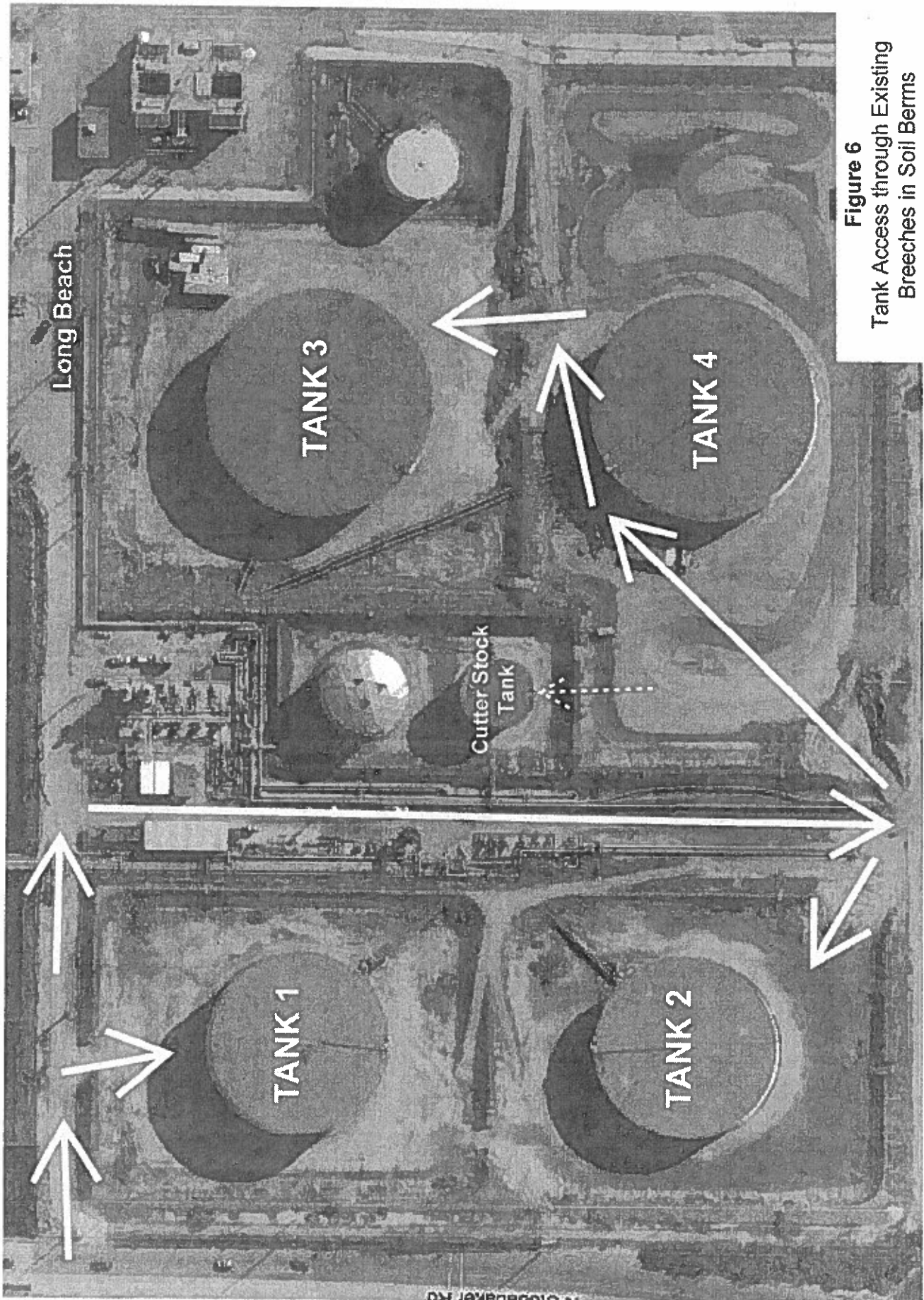


Figure 6

Tank Access through Existing Breaches in Soil Berms

400 Studebaker Rd.
Long Beach, CA

NOTE: Dashed line shows access to Cutter Stock Tank Across Area of Soil Berm Previously Sampled (see Appendix A for Soil Berm Sampling Report).

ATTACHMENT A

Nancy Beresky

From: Carmen Piro [Carmen.Piro@longbeach.gov]
Sent: Friday, March 19, 2010 1:56 PM
To: Timothy Buzbee
Cc: Nancy Beresky
Subject: Re: Fw: Transmittal of Post Tank Removal Sampling Workplan-Alamitos Generating Station, 400 Studebaker, Long Beach, CA

Waterstone's answers to these comments (yellow shade) are provided in red font.

Tim,

On 03-17-10 I talked to Nancy Beresky who was one of the consultants at Waterstone that signed the workplan dated 03-12-10. I informed her that she needed to talk to you before she re-submitted a corrected workplan.

One of the items I discussed with her was the fact that the workplan does not have information about the demolition contractor nor the estimated schedule for demolition activities.

I will be out on Monday and Tuesday, but, you may contact me at my cell if you have questions: (562)254-6085.

Carmen Piro, Haz Mat Spc
City of Long Beach CUPA/Health & Human Svcs Dept
(562)570-4137

Demo contacts and estimated schedule has been included in the introduction. A verbal comment by Ms. Piro asked to indicate that the workplan is being prepared pursuant to LBDHHS AND Lbfd requirements. References to the Lbfd are included where applicable.

Timothy Buzbee/FR/CLB

03/18/2010 08:08 PM

To Carmen Piro/HE/CLB@CLB

cc

Subject Re: Fw: Transmittal of Post Tank Removal Sampling Workplan-Alamitos Generating Station, 400 Studebaker, Long Beach, CA [Link](#)

Carmen,

Good Evening,

Sorry that this is so late in getting back to you. I have been in the field all day tying up loose ends. I do have some comments and have tried to identify them by the pages and paragraphs. My comments are as follows:

Page #2. Paragraph #2 There is a statement that refers to Figure 2. It states that there are no plans to remove, disturb or sample within AOC's 1 through 4 as shown on Figure 2. Isn't this where the work is shown to be done? AOC #5 are the 5 tanks, piping, and berms. Other AOCs are not going to be addressed at this time.

Page #4. bullet point #'s 3 and 4 after OR. Who will Fire be witnessing soil sampling for? Also, please confirm that our protocol will be followed and clearly specified. Fire is witnessing soil sampling for Studebaker-LB, LLC and the City of Long Beach DHHS as far as

Waterstone is aware. Language regarding protocol included in Introduction.

Page#5. Paragraph #2, please confirm that this is our protocol and what will be followed when the sampling occurs. Also, if L.B.F.D. is witnessing the soil sampling then two additional items are required per our protocol:

#1. Soil sampling shall be witnessed in person by a California Professional Geologist, with a current license or a California Registered Geologist. **Added to Revised Workplan.**

#2. Soil samples will be sealed by L.B.F.D. Inspector at the time they are taken, prior to placing them in ice chest. **Added to Revised Workplan.**

Page #7. bullet point #3 shall provide our entire address: 3205 Lakewood Boulevard, Long Beach, CA 90808. **Added to Revised Workplan.**

Page #8. Paragraph #1 under Schedule, Contractor doing the demolition of the tanks shall be required to gain approvals that have already been begun with L.B.F.D. Their documents shall reference the soil sampling protocol, so that it will be clearly understood. **Added to Revised Workplan. Communicated to GC to**

Page #13. Protocol for using Encores: Triple rinsing shall be specifically stated, so that no questions exist on what is expected. Also, all samples are sealed with approved seal tape by L.B.F.D. prior to placing on ice in ice chest. **send FD comment to demo contractor. Added to Revised Workplan.**

Hopefully, this will be of some help in regard to my review of this document. Feel free to contact me on Friday 3-19-10, after that I will be out of the office and may be difficult to reach until mid April.

Tim Buzbee
L.B.F.D. Plans Reviewer/Inspector
3205 Lakewood Blvd.
Long Beach, CA 90808
562.570.2542 (office)
562.499.1070 (fax)

From: Carmen Piro/HE/CLB
To: Timothy Buzbee/FR/CLB@CLB
Cc: Cheryl Sandel/HE/CLB@CLB
Date: 03/17/2010 05:21 PM
Subject: Re: Fw: Transmittal of Post Tank Removal Sampling Workplan-Alamitos Generating Station, 400 Sluddebaker, Long Beach, CA

Tim:

Find attached the sampling workplan for the site by Waterstone Environmental, dated March 12, 2010.

Please review to let me know what additional information should be included. For example, I noted that in page 4 it is mentioned that, at least, 7 calendar days are necessary for notification prior to having a LBFD inspector witness soil sampling activities.

Soon I will give the consultant a list with our requests. One of them is to provide the name of contractor who would do the demolition. In addition, I want her to send copies of the final workplan to all City's departments who are directly or indirectly involved in the project.

The Revised Workplan will also be sent to Derrick Burnham and Jill Griffiths of the City of Long Beach.

Carmen Piro, Haz Mat Spc
City of Long Beach Health & Human Svcs Dept
(562)570-4137

It's the only one we have.

[attachment "Post AST Removal Sampling Workplan-400 Studebaker LB.pdf" deleted by Timothy Buzbee/FR/CLB]

IMPORTANT WARNING: This e-mail (and any attachment) is only intended for the use of the person or entity to which it is addressed, and may contain information that is privileged and confidential. All recipients, including employees, are obligated and directed to maintain it in a safe, secure and confidential manner. Unauthorized redisclosure or failure to maintain confidentiality is strictly prohibited and may subject you to disciplinary action and/or be a violation of state and/or federal law(s) and carry criminal and/or civil penalties. If you are not the intended recipient, please immediately notify the sender by return e-mail and delete this message from your computer without making a copy or distribution.

Nancy Beresky

From: Christine Bucklin [CBucklin@dtsc.ca.gov]
Sent: Thursday, March 25, 2010 4:23 PM
To: Nancy Beresky
Cc: David Mackenbach; Kenneth A. Ehrlich
Subject: Post Tank Removal Sampling Work Plan - Studebaker LLC site, 400 Studebaker Rd, Long Beach, CA
Attachments: Christine Bucklin.vcf

Re: Post Tank Removal Sampling Work Plan - Studebaker LLC site, 400 Studebaker Road, Long Beach, CA

DTSC has completed a technical review of the referenced document. In general, the work plan does not satisfy the corrective action requirements necessary under RCRA and as agreed to in the RCRA Facility Investigation approved by the DTSC in 2007. However, the document may adequately meet the City of Long Beach's Tank Removal Guidelines.

As written, the work plan may not necessarily demonstrate complete characterization beneath the aboveground storage tanks (AGTs) and associated appurtenances. With the tanks removed, infiltration would be unbounded, thus potentially mobilizing contaminants to groundwater. Therefore, DTSC recommends complete characterization at the location of the AGTs (i.e. AOC #5). In order to meet a minimal standard, DTSC would require the following issues and/or items to be addressed in a revised Post Tank Removal Sampling Work Plan:

- 1) **BERMS:** It is likely that the berms will be disturbed during tank demolition activities. As such, it appears necessary to include a discussion regarding the bermed soils associated with the AGTs: protection during tank demolition, sampling efforts, final use, etc. Existing ramps will be used. There may be a need to ramp the south side of the Cutter Stock Tank Berm (sampled in Berm Sampling Report). No soil excavation is planned - will use Guidance if needed to manage soil.
- 2) **GRAVEL BASE:** It has been acknowledged in previous documents associated with the property, that the base of Tanks 1,2,3, and 4 is likely 12 inches of gravel that was periodically sprayed to inhibit corrosion. In addition, the heavy range fuel oils laid upon this gravel and likely penetrated to some degree over the years. It was therefore understood that the gravels represented a contaminated media that would be handled during tank demolition. Please identify how the gravel beds are to be addressed. Further, please note, that any soil sampling should begin directly beneath the gravels (i.e. gravel should not be sampled as part of the subsurface investigation). There is currently no plan to remove gravels during this phase of work. The gravels provide a barrier with the sprayed material intact that will reduce rainwater infiltration. Samples will be taken below gravel but removal of gravel will be limited to less than 1 foot square.
- 3) **ASSOCIATED PIPING:** It is not clear from the work plan how the connected transfer piping will be handled. Please clarify, and if necessary, include the appropriate sampling requirements (see below). The Revised Workplan now includes over 20 sampling locations at the piping in compliance with the City's Post Tank Removal Guidelines.
- 4) **SOIL SAMPLING:** In addition to the sampling requirements documented in the Long Beach Tank Regulations, DTSC will require an additional sampling interval at 6 inches below ground surface (below gravel base). Further, based on the size of the AGTs, DTSC will also require at least 2 additional sampling locations (for a total of 4) beneath each tank, and two additional samples beneath the Cutter tank (for a total of 3). Lastly, rather than a prescribed 10 foot bgs depth, DTSC recommends a preliminary boring be advanced to groundwater to identify the observed water table at AOC#5; then base the deepest borings on that depth.
Both parts of this DTSC comment are directly addressed in Task 2 of the Revised Workplan.
- 5) **GROUNDWATER SAMPLING:** DTSC will require a groundwater sample beneath the Cutter tank.
This additional groundwater sample has been added in the Revised Workplan.

- 6) ANALYTICAL METHODS: CAL-LUFT is considered a screening methodology for the purposes of DTSC site investigations. It is more appropriate to utilize 8015M methodology. Further, DTSC recommends that at least one sample (from the highest mid range hydrocarbon detections) from beneath each AGT be sampled for semivolatle organic compounds for future risk assessment needs. The use of 8015M has been added in the Revised Workplan. Semi-volatile analysis will be performed during the site wide RFI assessment.
- 7) 5035 METHOD: It is highly recommended that the soils are preserved in the field using the "VOA Kit" versus the Encore method. DTSC has found this to be a more reliable collection method than other 5035 collection methods. The contract lab can supply you with the pre-filled preservative voas. This soil preservative methodology has been added in the Revised Workplan.
- 8) The contract lab should be identified in the work plan. The contract lab has been identified in the Revised Workplan.

It is clear that the document is focused to meet the base requirements of the City of Long Beach. However, in order to demonstrate that the area beneath the tanks is adequately characterized, the above recommendations should be addressed.

If you have any questions, feel free to contact me. As always, we appreciate DTSC's review and comments especially in such a short timeframe. We do understand that the scope that is provided in the Revised Workplan meets the City's requirements and that additional work will be required by DTSC at a later date for AOC 5 addressing these DTSC comments.

Sincerely,

Christine Bucklin, P.G.
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, CA 91311
818-717- 6599 work #
818-717- 6587 fax #
email: cbucklin@dtsc.ca.gov

Please note that the Governor has ordered that I take three compulsory furlough days off per month. Depending on when you contact me, there may be a delay in my ability to respond to you in a timely manner.

Nancy Beresky

From: Timothy Buzbee [Timothy.Buzbee@longbeach.gov]
Sent: Monday, April 19, 2010 11:46 AM
To: Nancy Beresky
Cc: Carmen Piro; Christine Bucklin; KAE@JMBM.com; Derek Burnham; Lynette Ferenczy; Kenneth Ayala; Frank Hayes
Subject: Re: Fw: SUBMITTAL: Revised Post AST Removal Sampling Workplan for 400 Studebaker, Long Beach, CA (L.B.F.D. Comments of 4-19-10).

Nancy,

Good Morning,
I have gone through the 28 page soil sampling workplan developed by you and your company (Waterstone Environmental, Inc.), and have the following comments:

Yes, this change was made.

Page #5, Section outlining Task 1, last point before OR- it references UST's? Shouldn't this be AST's?

Page #6, first bullet item in regard to scheduling- incorporate the statement that inspections are scheduled by the inspector's availability. Requests shall be received a minimum of 72 hours in advance. Every attempt to fill this request will be perused by L.B.F.D.

Language added.

Page #6, last bullet before Task 2- items speaks of calibration of field equipment. Please provide a note/statement that continuous air monitoring will be conducted during soil sampling and similar operations. Air monitoring equipment shall have current calibration sticker affixed that shows it has been calibrated within the last 90 days. Language added.

Page #6, Section outlining Task 2, second bullet which speaks of cutter stock tank (CST), please reference figure where this identifier is used. Language added.

Page #6, Section outlining Task 2, paragraph below second bullet- this speaks of 2' to 4' intervals required by Guidance. Is this meant to state 2' to 4' below grade or pipe as outlined in City of Long Beach (Health and Fire) Guidelines for Aboveground and Underground Storage Tanks? Language revised for clarity.

Page #6, Section outlining Task 2, second paragraph below the two bullets- please include reference to fittings. Per our requirements these are also soil sampling points. Language added to include sampling beneath fittings.

Page #6, Section outlining Task 2, last paragraph on the page speaks of torch cutting activities? Please clarify purpose of referencing hot work activities. From where I stand, hot work procedures are not related to soil sampling and shall be addressed as part of the on going plan review (FTNK 33958), that was under review last Fall 2009. We have issued corrections on this topic as related to the demolition activities of the five tanks. "Hot work" language was replaced with "demolition".

Page #9, Section outlining Soil Removal Procedures, bullet #2 speaks of underground storage tank? Also Leaking Underground Storage Tank (LUFT). Isn't the entire scope of this work dealing with Aboveground Storage Tanks?

This section merely paraphrases the exact language of the guidance so no change was made.

Page #9, Section outlining Soil Removal Procedures, bullet #3 speaks of stockpiles. We specified that stockpiles were to be placed on heavy duty plastic sheeting. For some reason this was not picked up. Please specify it here so that there is no questions in the field, as to what is expected. Language added.

Page #10, Section outlining Task 3 (from previous page), paragraph after bullet #5 on this page- this section speaks of removal contractor. Shouldn't this be demolition contractor? Changed "removal" to "demolition."

Page #10, Section outlining Post Tank Removal Soil Sampling Schedule- please add a statement that demolition plan review shall continue once a re submittal occurs to L.B.F.D. which includes the approved version of this document. All items previously noted as corrections shall be addressed per standard protocol of L.B.F.D. Tank Section. All responses on FTKN 33958, shall be addressed in writing as specified on prior corrections. Failure to follow this may delay project start date. Language added.

It is recommended that tank outlines on "figures" be darker to clearly show them as a reference point, should questions come up in the field. Hopefully, we are almost there. Please address these items and incorporate them into the next submittal. We will then review for the items specified above. Feel free to contact me with any questions. Have a GREAT Day.

Figure 2 has been changed.

Tim Buzbee

L.B.F.D. Plans Reviewer/Inspector
3205 Lakewood Blvd.
Long Beach, CA 90808
562.570.2542 (office)
562.499.1070 (fax)

-----Carmen Piro/HE/CLB wrote: -----

To: Timothy Buzbee/FR/CLB@CLB
From: Carmen Piro/HE/CLB
Date: 03/30/2010 12:14PM
Subject: Fw: SUBMITTAL: Revised Post AST Removal Sampling Workplan for 400 Studebaker, Long Beach, CA

Tim:

I have not reviewed this plan yet. Nancy B. did not have you e-mail so she has asked to mail it to you. Please let me know about your comments.
Carmen Piro, Haz Mat Spc

----- Forwarded by Carmen Piro/HE/CLB on 03/30/2010 12:06 PM -----

"Nancy Beresky"
<nberesky@waterstone-
To "Carmen Piro" <Carmen.Piro@longbeach.gov>, "Christine Bucklin" <CBucklin@dtsc.ca.gov>
cc "Ehrlich, Kenneth A." <KAE@JMBM.com>, <Derek_Burnham@longbeach.gov>,"

env.com>

<jill_griffiths@longbeach.gov>

Subject:SUBMITTAL: Revised Post AST Removal Sampling Workplan for 400 Studebaker, Long Beach, CA

03/29/2010 12:41 PM

Many thanks to the City of Long Beach and DTSC for their quick turnaround on comments to the original workplan. Attached is the revised workplan that now incorporates all agency comments.

This email copy is the only copy you will receive unless you request a hard copy from me via return email. It will also be uploaded to the DTSC ftp site.

Derek Burnham and Jill Griffiths: Mike Murchison requested I send this to you and you could distribute it to other parties that need it. The City of Long Beach DHHS (Carmen Piro) asked us to make sure that it was distributed to "all City's departments who are directly or indirectly involved in the project." Thank you!

Carmen: could you please forward this email to Tim Buzbee at LBFD. I do not have his email address. Thank you!

Please call if you have any questions.

Nancy Beresky; PG, CEM

Principal Hydrogeologist

Cell: 714-310-4188

nberesky@waterstone-env.com

Waterstone Environmental, Inc.
2936 East Coronado Street
Anaheim, CA 92806
Office: 714-414-1122 Fax: 714-414-1166
www.waterstone-env.com



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ATTACHMENT B

WATERSTONE ENVIRONMENTAL, INC.
STANDARD PROTOCOL
FOR
SOIL SAMPLING USING A GEOPROBE

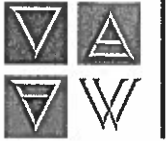
Undisturbed soil samples are collected using a modified piston drive sampler. The soil sampling device is deployed by a Geoprobe rig at all locations. The Geoprobe is a rig with a hydraulic system that is used to push hollow steel rods with a sampling device at the end of the rods through the subsurface. The Geoprobe rig pushes the sampling device to the targeted depth for sample retrieval.

Once the soil sampling device is positioned at the appropriate depth, the tip of the device is retracted inside the soil sampling probe and the probe is advanced 2.0 feet to allow soil to enter the sampling device. The sampling device is lined with four 6-inch long and 1.25-inch diameter brass tube. Upon retrieval of the soil sampling device, the brass tube at the lower end of the sampler is covered with Teflon tape and plastic end caps, labeled identifying the date the sample is collected and an identification designation, and placed in a cooler to be shipped to a certified analytical laboratory.

The material in the remaining brass tubes are placed in a ziplock bag to conduct headspace testing on the material after sufficient volatilization had occurred (approximately 5 minutes). The probe of a Hnu photoionization detector (PID) calibrated to isobutylene is placed inside the bag to monitor for volatile organic vapors. Following headspace measurements the sample is visually inspected by the site hydrogeologist and classified using the Unified Soil Classification System. The soil is inspected for color, texture, grain size distribution, moisture content, odor, and any other distinguishing characteristics. Lithologic data, PID readings and other pertinent data are recorded on a boring log.

Prior to sampling, all reusable sampling equipment is decontaminated by washing in a solution of non-phosphate soap and water. The equipment is then double rinsed in distilled water. The sample push rods are steam cleaned on-site between each sample location. The rinsate water is placed in Department of Transportation approved 55 gallon drums and centralized to an on-site location.

All soil sample locations are backfilled with bentonite chips and hydrated and then capped with asphalt patch or concrete to grade.



WATERSTONE ENVIRONMENTAL, INC.
STANDARD PROTOCOL FOR COLLECTION OF SOIL SAMPLES
USING EPA Method 5035
Volumetric Sampling Cores

ESS Lock N' Load Handle and Syringe or equivalent sample tubes come in bags of 50-count. A separate sampling tube (or syringe) is loaded into the handle and set for a volume of 5 grams or 10 grams depending on the required analyses.

Each soil sample is collected by hand driving the tube, attached to and locked into the end of the T-bar sample collection handle, into the undisturbed soil at each sampling depth. Samples may be taken out of the end of a secondary undisturbed sample sleeve or directly out of the soil if desired depth is safely accessible. To collect the sample, the syringe is pushed into the soil until the plunger portion of the syringe makes contact with the base of the handle. Soil is then transferred from the sampler into a 40 ml vial with appropriate preservative as provided by the laboratory by turning the handle 1/4 turn left (back to the fitted track) and pushing down. At this point, the soil is delivered into the 40 ml vial which is capped and stored at 4° C during shipment to the laboratory.

A sample label is attached to each individual VOA vial, identifying the date and time the sample was collected, the identification number, and other identifying information.

Soil samples are placed in a thermally insulated container with ice and shipped or couriered to a State-certified hazardous waste-testing laboratory or delivered immediately to an on-site mobile laboratory using the appropriate chain-of-custody procedures.

Prior to and between the sampling intervals, all reusable equipment (T-bar handle) is decontaminated by washing in a non-phosphate detergent (Liquinox) solution. The equipment is then rinsed in tap water, and then rinsed in distilled water. This is a triple rinse decontamination procedure.

**WATERSTONE ENVIRONMENTAL, INC.,
STANDARD PROTOCOL
FOR
GEOPROBE GROUNDWATER SAMPLING (HYDROPUNCH)**

Groundwater samples were collected using a Hydropunch deployed using Geoprobe. The Strataprobe is a rig with a hydraulic system that is used to push hollow steel rods with a sampling device at the end of the rods through the subsurface. The Geoprobe rig pushes the sampling device to the targeted depth for sample retrieval.

Once the groundwater sampling device (Hydropunch) is positioned at the appropriate depth, the tip of the device is retracted inside the Hydropunch and the probe is advanced 4.0 feet to allow groundwater to enter the sampling device. When the desired interval is reached, the Hydropunch is opened by pulling back on the body of the tool. Groundwater flows through the intake screen, past a lower check valve and into the sample chamber. Because the sample chamber fills from the bottom there is no aeration and minimal agitation of the sample. A second, upper check valve keeps water in the sample chamber as the tool is pulled back up to the surface. The water sample is then decanted into a sample container through a discharge valve and tubing.

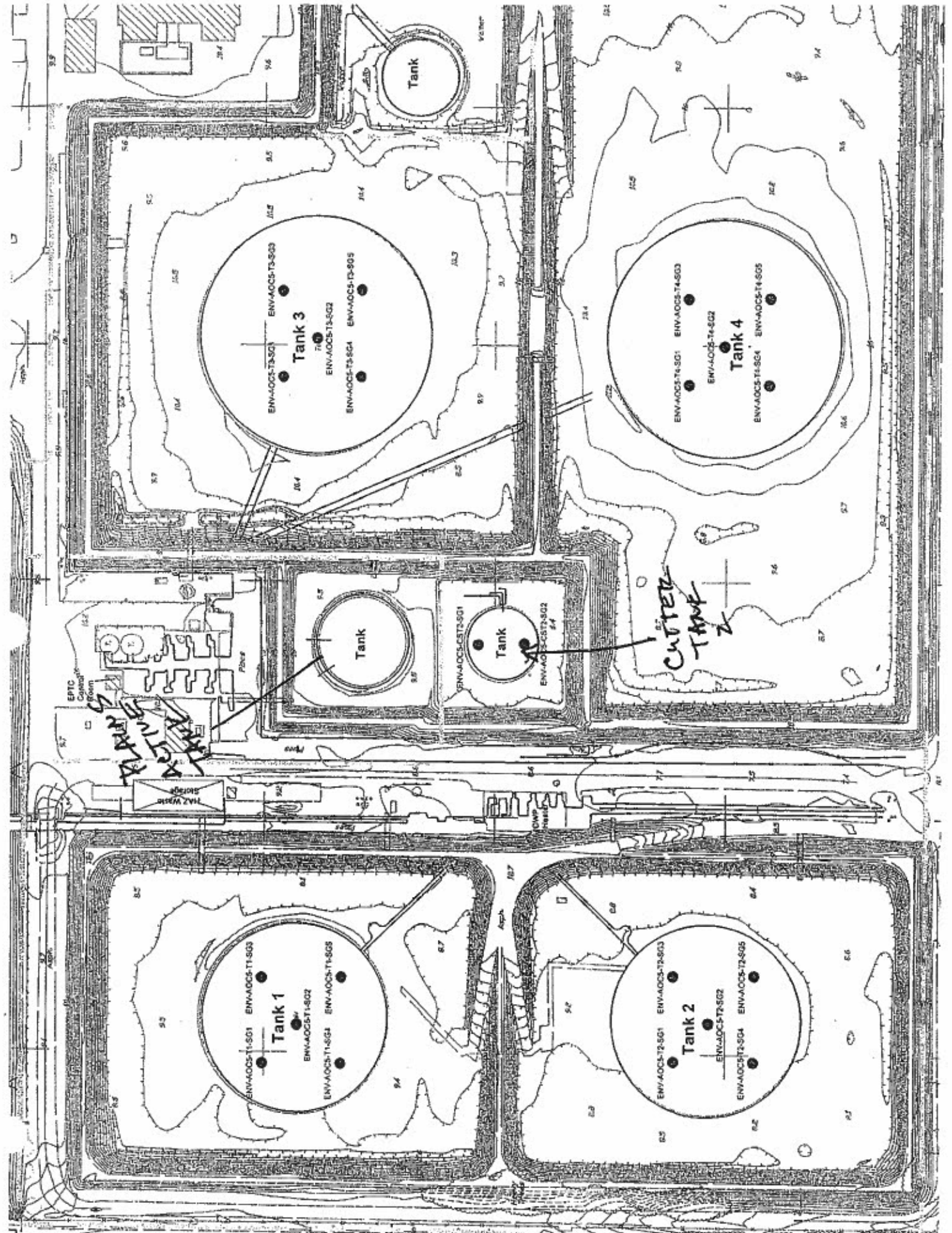
All sampling equipment is decontaminated prior to each use by washing in detergent solution and rinsing with fresh water and distilled water.

At the completion of each groundwater sampling the borehole is pressure grouted with bentonite grout. Hollow grout rods, with a sacrificial tip attached to the bottom rod, is reinserted into the borehole and driven to the termination depth of the Geoprobe. After the rods are set in place, bentonite grout is pumped under pressure which knocks out the sacrificial tip. Bentonite grout is pumped through rods until the hole is filled. After the grout rods are removed, the top of the hole is filled with bentonite chips and/or capped with asphalt or concrete to match existing grade if needed.

STUDEBAKER ROAD

WATER TANKS
EPTC Control Room

CUTTER TANK



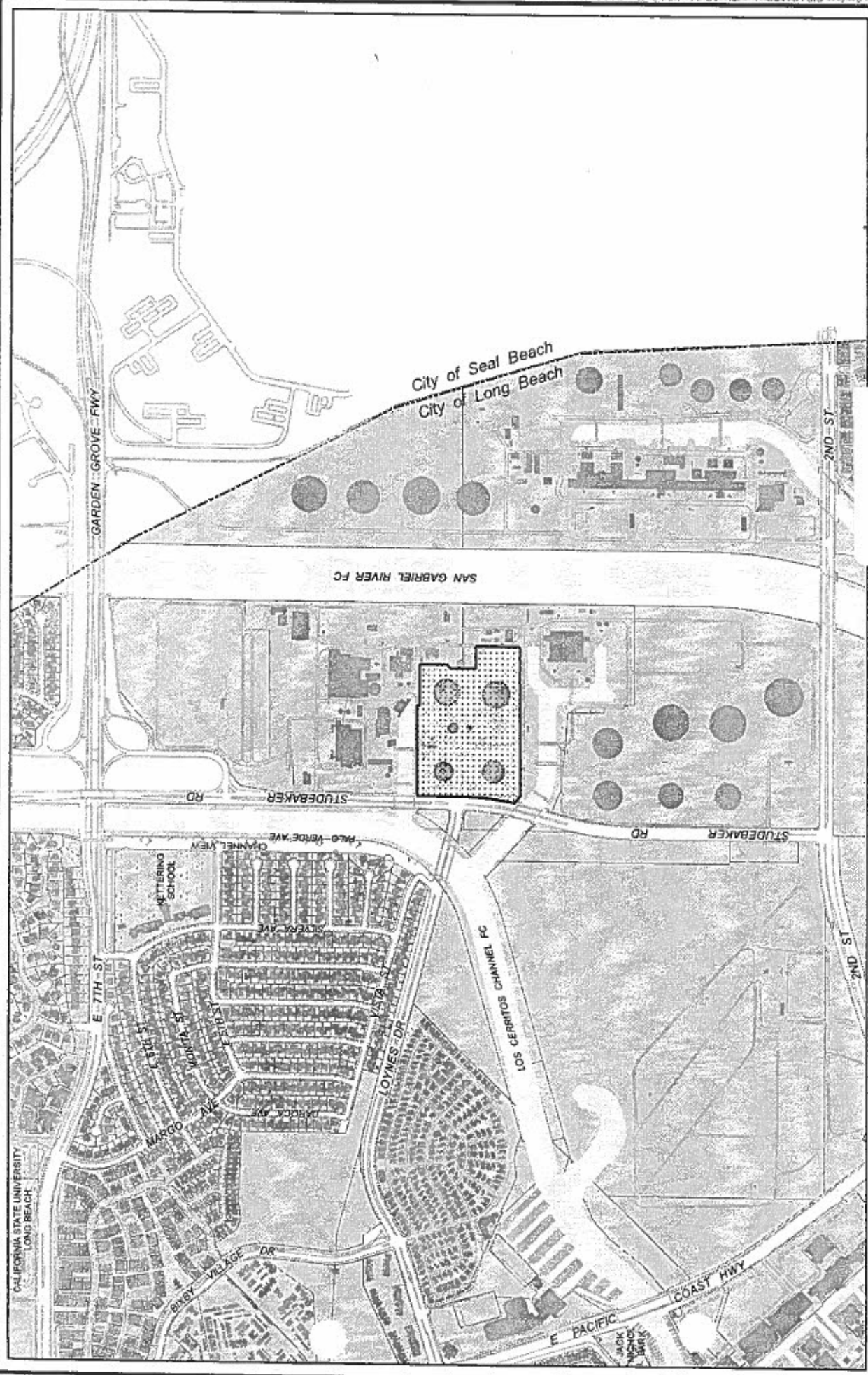
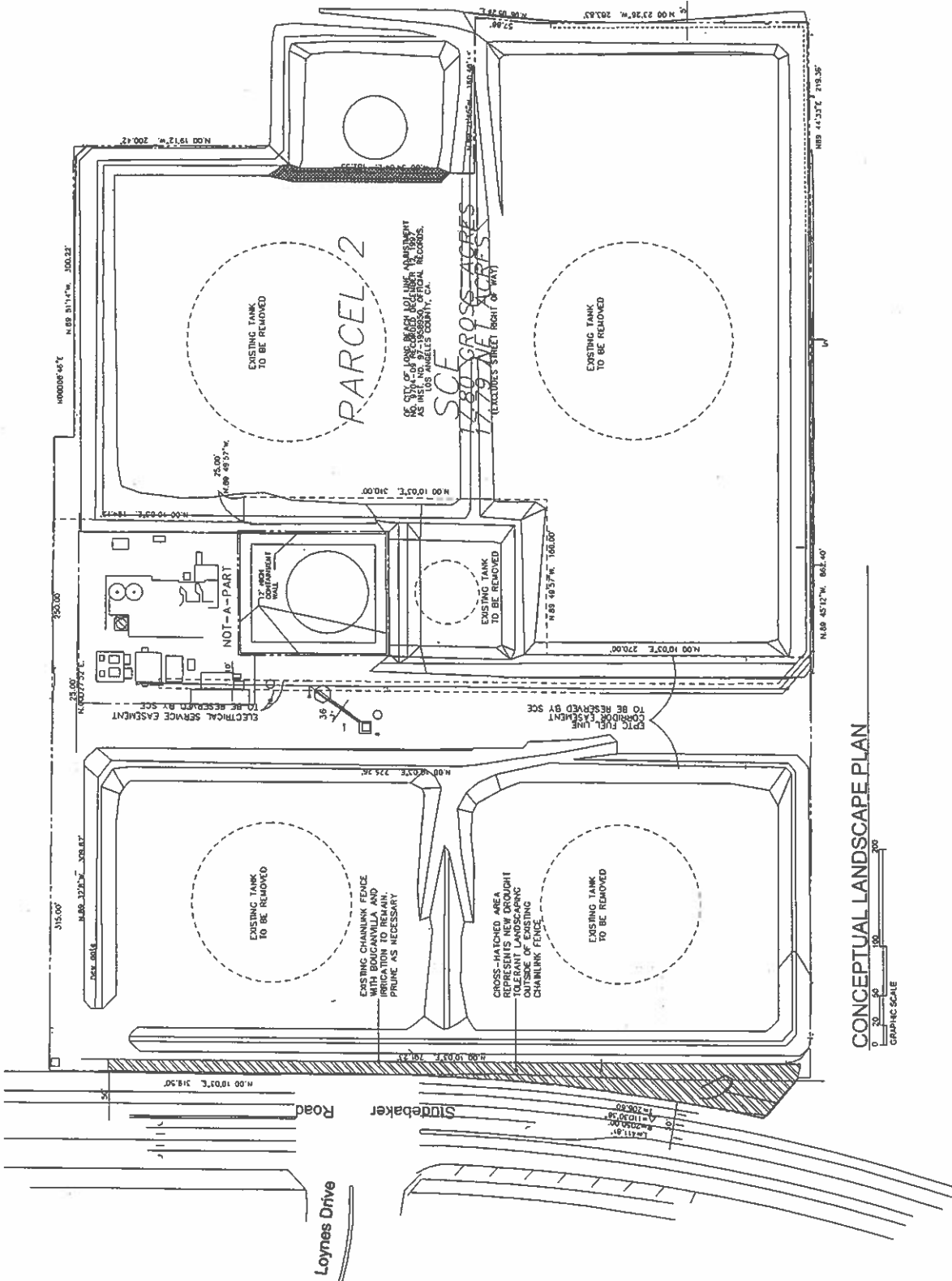


Exhibit B



Subject Property:
400 Studebaker Rd
Application No. 0911-04
Council District 3
Zoning Code : PD-1 (SubArea 19)





CONCEPTUAL LANDSCAPE PLAN

GRAPHIC SCALE

HMR ARCHITECTS
 221 MAIN STREET
 HUNTINGTON BEACH, CA. 92648
 714-835-6300 email: hmr@hmrllc.com



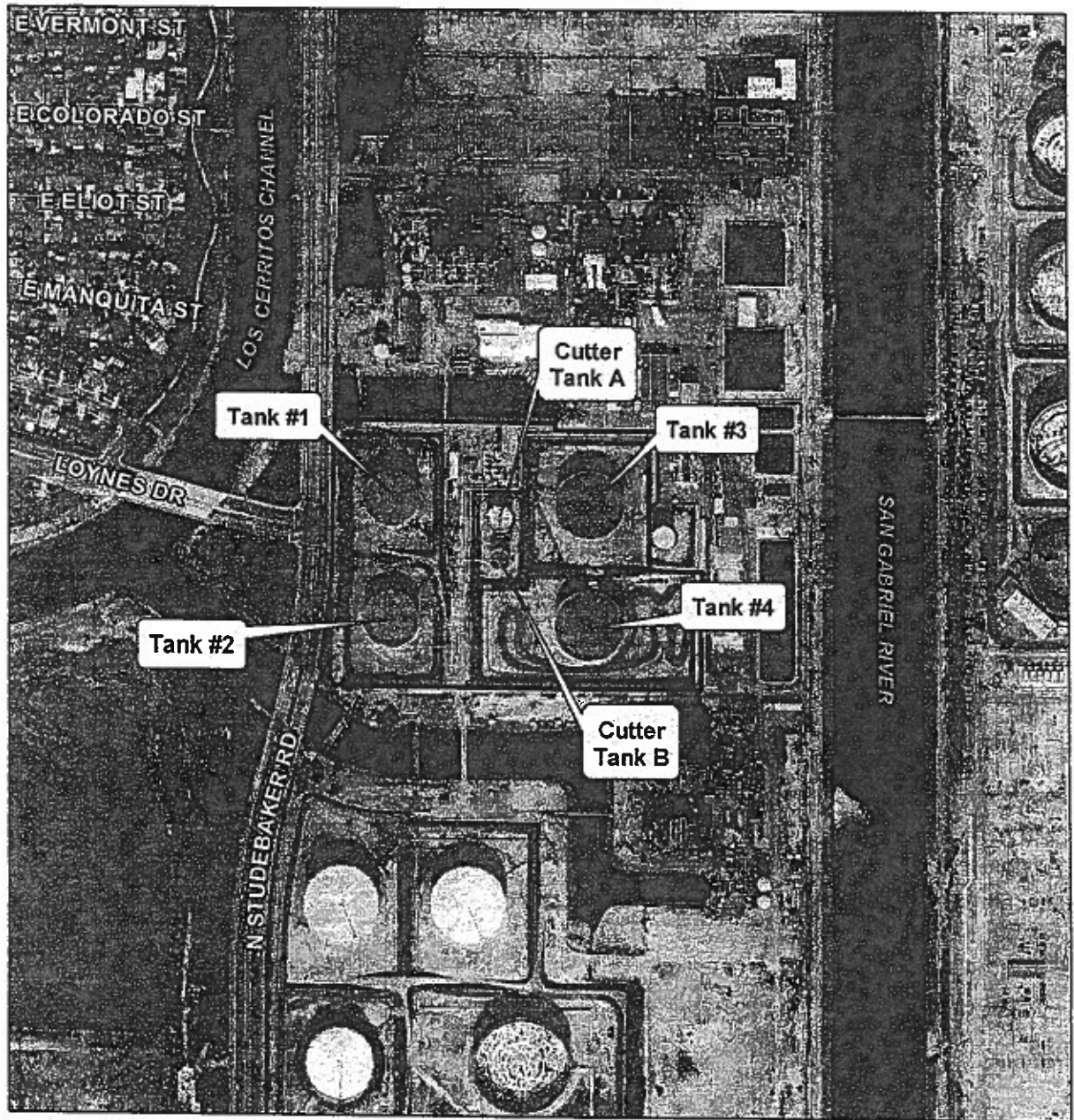


Image Source: TerraServer, 2009.



Project Site and Vicinity

Figure 2
City of Long Beach



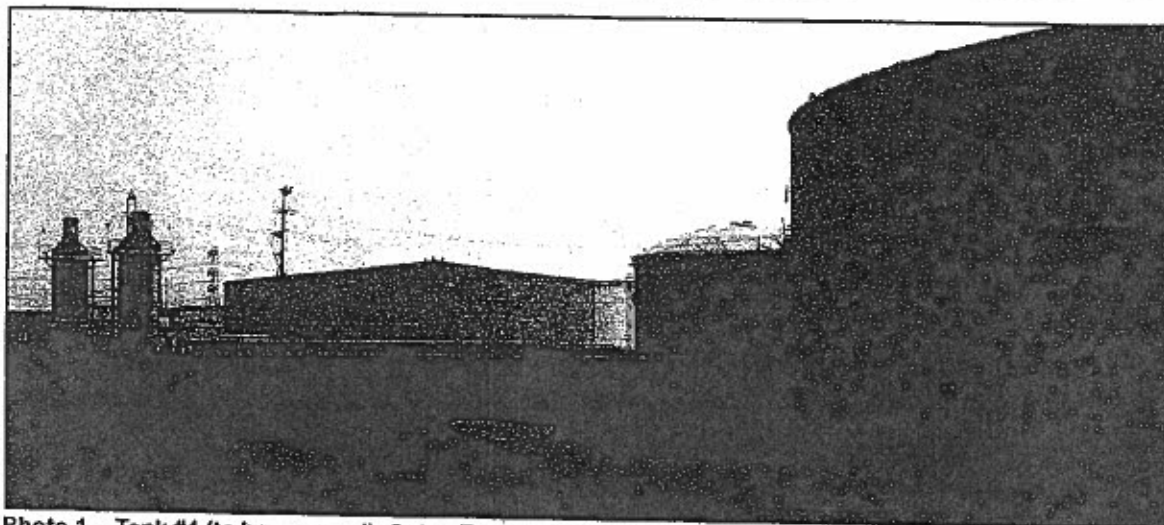


Photo 1 - Tank #4 (to be removed), Cutter Tank #1 (tank stays), and Tank #1 (to be removed). (From left to right)

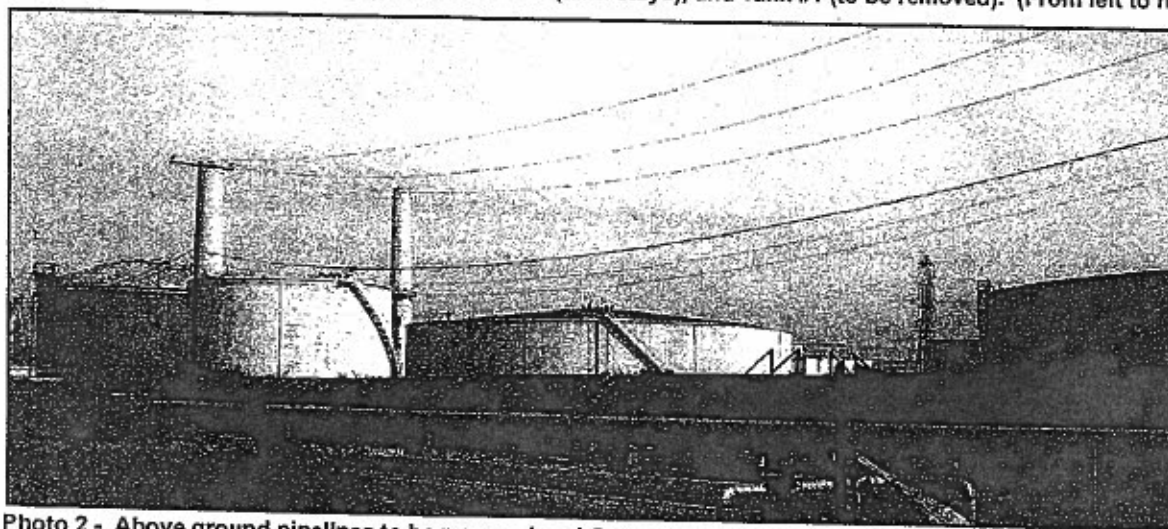


Photo 2 - Above ground pipelines to be removed and Cutter Tanks #1 and #2, Tank #4, and Tank #3.

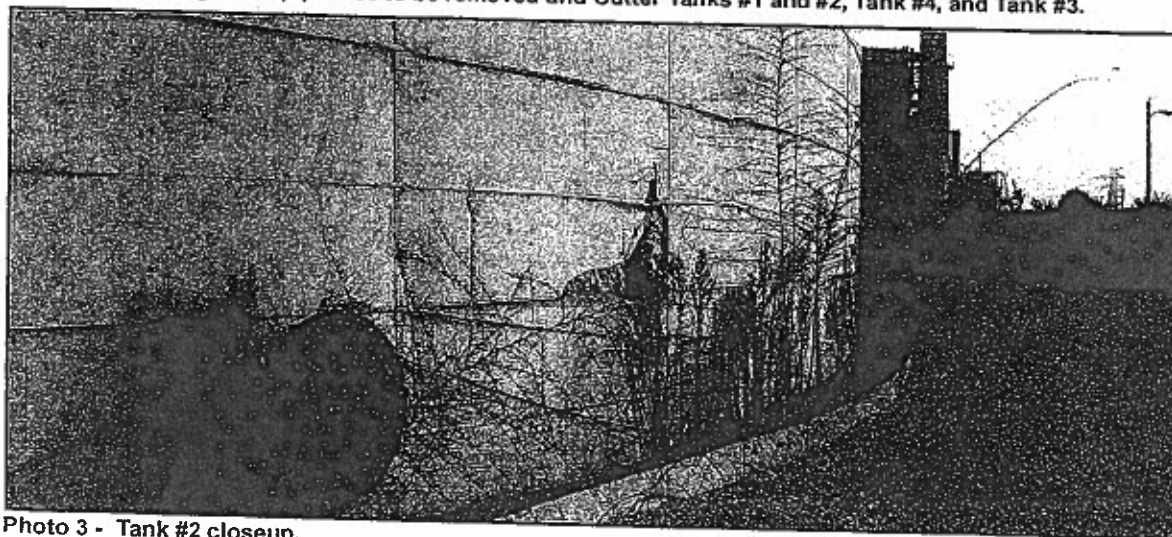


Photo 3 - Tank #2 closeup.

Interior Site Photographs



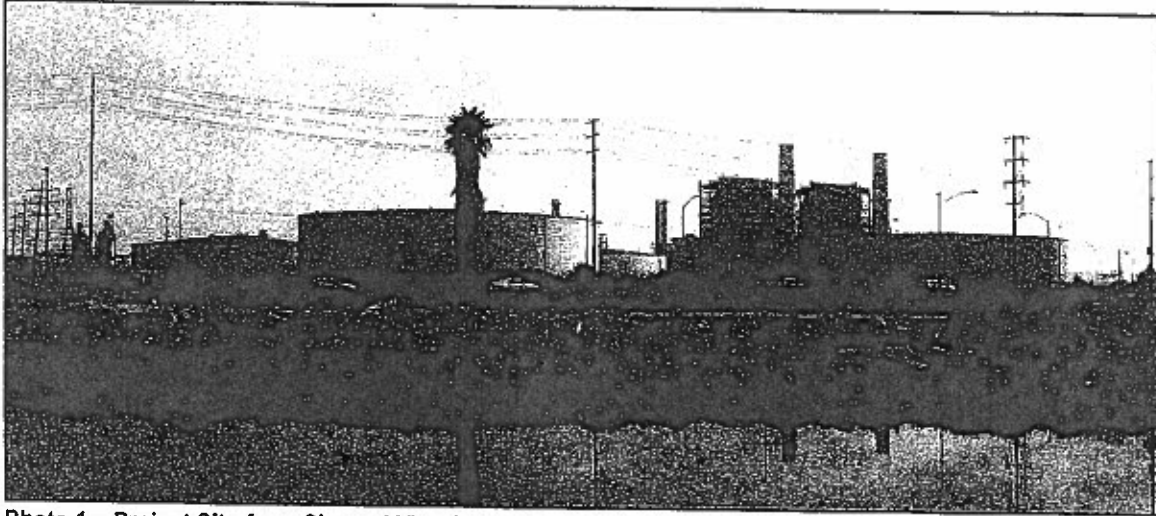


Photo 1 - Project Site from Channel View Park adjacent to single family residential neighborhood to west of project site.

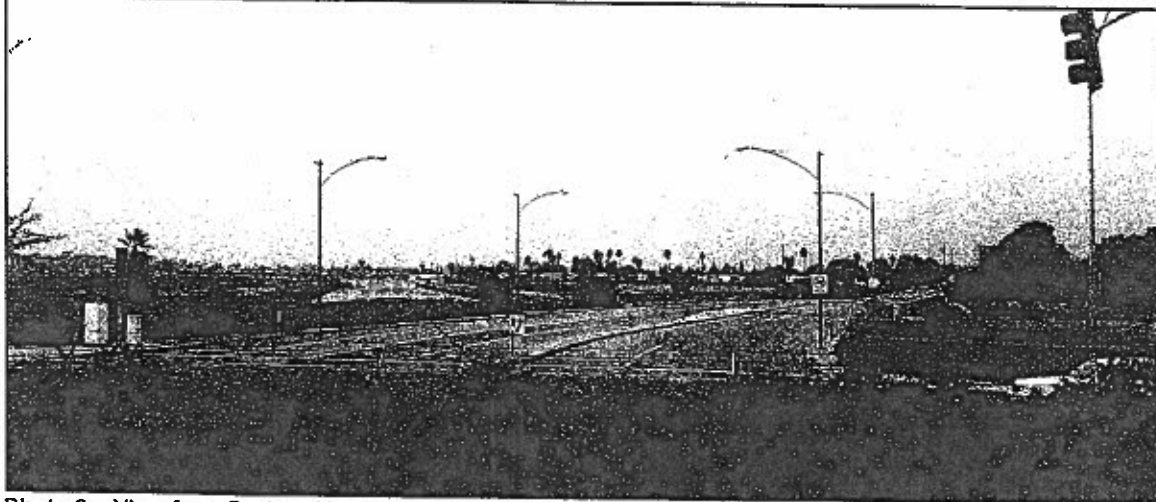


Photo 2 - View from Project Site looking west towards Loynes Drive and Los Cerritos Channel and residential neighborhood.

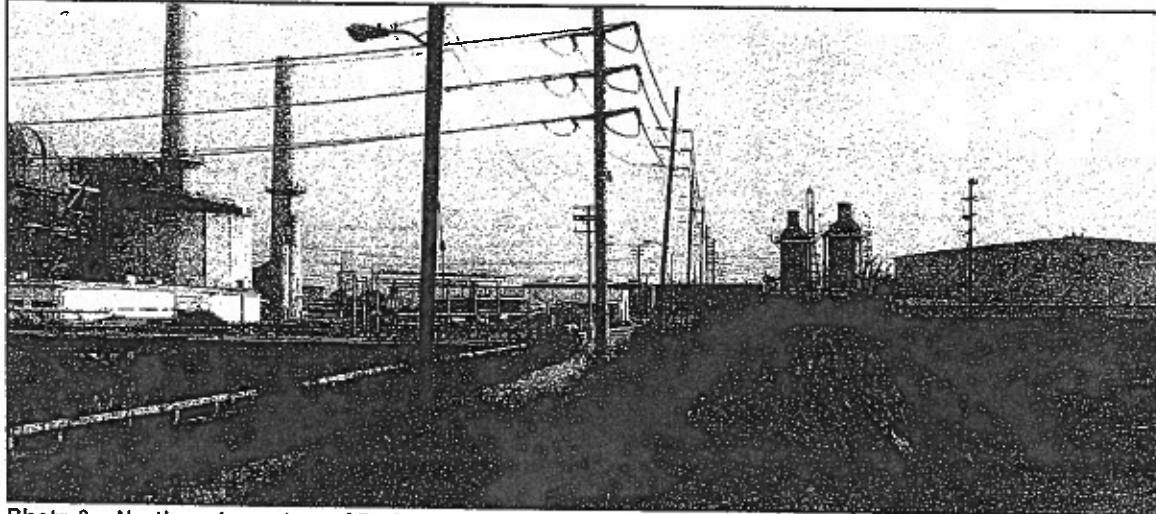


Photo 3 - Northern boundary of Project Site indicating proximity to arm of Los Cerritos Channel.

Adjacent Uses





Rincon Consultants, Inc.
790 East Santa Clara Street
Ventura, California 93001

805 641 1000
FAX 641 1072

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January 21, 2010

Craig Chalfant
Long Beach Development Services
333 West Ocean Blvd, 5th Floor
Long Beach, CA 90802

Subject: Agency Permits and Approvals for the proposed Studebaker LB Tank Removal Project

Dear Mr. Chalfant:

Below is the requested list of required agency permits and approvals for the proposed Studebaker LB Tank Removal Project. This list assumes that the project would be completed as identified in the Draft Mitigated Negative Declaration (January 2010).

- City of Long Beach Planning Commission
 - Adoption of the MND (appealable to the City Council)
 - Granting of a Local Coastal Development Permit (appealable to the City Council and Coastal Commission)
- Regional Water Quality Control Board
 - File a notice for stormwater discharges from large and small construction activities
 - Prepare a Stormwater Pollution Prevention Plan (SWPPP)
- South Coast Air Quality Management District (SCAQMD)
 - File notification of demolition and asbestos abatement - pursuant to SCAQMD Rule 1403
 - Fugitive Dust Requirements - pursuant to SCAQMD Rule 403
- Long Beach Certified Unified Program Agency (CUPA)
 - Long Beach Health Department (LBHD) approves aboveground storage tank (AST) demolition work plan
 - Long Beach Fire Department (LBFD) approves AST demolition work plan

Studebaker LB, LLC Tank Removal Project
Agency Approval and Permit Matrix

Approving/Issuing Agent	Action Required	When Action is to occur	Monitoring Frequency	Responsible Agency or Party
City of Long Beach Planning Commission	Adoption of the Mitigated Negative Declaration (appealable to the Long Beach City Council)	Prior to the commencement of demolition	Once	Planning Commission and, if needed, City Council
	Granting of a Local Coastal Development Permit (appealable to the City Council and Coastal Commission)	Prior to the commencement of demolition	Once	Planning Commission and, if needed, City Council and Coastal Commission
Regional Water Quality Control Board (RWQCB)	Applicant must file a notice for stormwater discharges from large and small construction activities	Prior to commencement of demolition	Once	Applicant and RWQCB
	Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP)	Prior to commencement, and during demolition	As needed	Applicant and RWQCB
South Coast Air Quality Management District (SCAQMD)	File notification of demolition and asbestos abatement – pursuant to SCAQMD Rule 1403	Prior to commencement of demolition	Once	Applicant and SCAQMD
	Follow fugitive dust requirements pursuant to SCAQMD Rule 403	During demolition	As needed	Applicant and SCAQMD
Long Beach Certified Unified Program Agency (CUPA) – Long Beach Health Department (LBHD) and the Long Beach Fire Department (LBFD)	LBHD approves aboveground storage tank (AST) demolition work plan	Prior to commencement of demolition	Once	LBHD
	LBFD approves AST demolition work plan and provides oversight	Prior to commencement and during demolition	As needed	LBFD
Department of Toxic Substances and Control (DTSC)	Corrective Actions Consent Agreement between Applicant and DTSC	Already in place	As needed	DTSC
	Approval of work plan and submittal to LBHD	Prior to commencement of demolition	Once	DTSC and LBHD
Long Beach Development Services Department	Issue Demolition Permit	Prior to commencement of demolition	As needed	Long Beach Development Services Department

LOCAL COASTAL DEVELOPMENT PERMIT FINDINGS

1. THE PROPOSED DEVELOPMENT CONFORMS TO THE CERTIFIED LOCAL COASTAL PROGRAM INCLUDING BUT NOT LIMITED TO ALL REQUIREMENTS FOR REPLACEMENT OF LOW AND MODERATE-INCOME HOUSING; AND

A positive finding can be made for this item.

The proposed project conforms to the Local Coastal Program (LCP). The project, removal of the four large AST's (Tank Nos. 1-4), Cutter Tank B (Cutter Tank A is still in use and will remain), along with above ground pipelines associated with these five AST's, is consistent with the Local Coastal Program (LCP). The site is located in the South East Area Development and Improvement Plan (SEADIP) also known as Planned Development Area 1 (PD-1), subarea 19. Subarea 19 allows industrial use in accordance with the General Industrial (IG) development standards. The site is currently dormant and has no occupants or use. No future land uses is proposed.

The four large AST's (Tank Nos. 1,2,3,4) originally stored Fuel Oil No. 6, which formerly fueled the adjacent power plant. The capacity of these tanks is between 5,888,000 and 9,400,000 gallons. The four large tanks are approximately 40 feet high and 160 to 200 feet in diameter. The remaining smaller AST's (Cutter Tanks A and B) have been used to store distilled oil. The smaller tanks have a capacity of 840,000 to 1,220,000 gallons with a diameter of approximately 60 feet. All tanks have a berm system to contain any tank spills. At present, the only operating facilities on the project are Cutter Tank A, an operations shed, and conveyance pipelines, all of which are maintained by Plains Petroleum

Demolition of the five tanks would take approximately six weeks to complete. Two tanks and associated piping would be demolished at one time before moving on to the other tanks. The tanks would be demolished and stockpiled in bins until taken to a landfill. The proposed demolition activities are consistent with the LCP.

2. THE PROPOSED DEVELOPMENT CONFORMS TO THE PUBLIC ACCESS AND RECREATION POLICIES OF CHAPTER 3 OF THE COASTAL ACT. THE SECOND FINDING APPLIES ONLY TO DEVELOPMENT LOCATED SEAWARD OF THE NEAREST PUBLIC HIGHWAY TO THE SHORELINE.

A positive finding can be made for this item.

Chapter 3 of the Coastal Act deals with the public's right to use of beach and water resources for recreational purposes. The chapter provides the basis for state and local governments to require beach access dedication and to prohibit development, which restricts public access to the beach and/or water resources.

The subject site is located north of Second Street, the nearest public highway.

**LOCAL COASTAL DEVELOPMENT PERMIT
CONDITIONS OF APPROVAL (400 Studebaker Road)
Case No. 0911-04
Date: May 6, 2010**

1. This permit and all development rights hereunder shall **terminate one year** from the effective date (final action date or, if in the appealable area of the Coastal Zone, 21 days after the local final action date) of this permit unless construction is commenced, a business license establishing the use is obtained or a time extension is granted, based on a written and approved request submitted prior to the expiration of the one year period as provided in Section 21.21.406 of the Long Beach Municipal Code.
2. This permit shall be invalid if the owner(s) and applicant(s) have failed to return **written acknowledgment** of their acceptance of the conditions of approval on the *Conditions of Approval Acknowledgment Form* supplied by the Planning Bureau. This acknowledgment must be submitted within 30 days form the effective date of approval (final action date or, if in the appealable area of the Coastal Zone, 21 days after the local final action date).
3. If, for any reason, there is a **violation of any of the conditions** of this permit or if the use/operation is found to be detrimental to the surrounding community, including public health, safety or general welfare, environmental quality or quality of life, such shall cause the City to initiate revocation and termination procedures of all rights granted herewith.
4. All conditions of approval **must be printed** verbatim on all plans submitted for plan review to the Director of Development Services. These conditions must be printed on the site plan or a subsequent reference page.
5. The Director of Development Services is authorized to make **minor modifications** to the approved design plans or to any of the conditions of approval if such modifications shall not significantly change/alter the approved design/project and if no detrimental effects to neighboring properties are caused by said modifications. Any major modifications shall be reviewed by the Zoning Administrator or Planning Commission, respectively.
6. Site development, including landscaping, shall conform to the approved plans on file in the Director of Development Services. At least **one set of approved plans** containing Planning, Building, Fire, and, if applicable, Redevelopment and Health Department stamps **shall be maintained at the job site**, at all times for reference purposes during construction and final inspection.
7. Where feasible, all landscaped areas shall be planted with **drought tolerant plant materials**. All landscaped areas shall be provided with water conserving automatic irrigation systems designed to provide complete and adequate coverage to sustain and promote healthy plant life. The irrigation system shall not cause water to spray or flow across a public sidewalk.

8. All landscaped areas must be maintained in a neat and healthy condition, including public parkways and street trees. Any dying or dead plant materials must be replaced with the minimum size and height plant(s) required by Chapter 21.42 (Landscaping) of the Zoning Regulations. At the discretion of city officials, a yearly inspection shall be conducted to verify that all irrigation systems are working properly and that the landscaping is in good healthy condition. The property owner shall reimburse the City for the inspection cost as per the special building inspection specifications established by City Council.
9. The property shall be developed and maintained in a neat, quiet, and orderly condition and operated in a manner so as not to be detrimental to adjacent properties and occupants. This shall encompass the maintenance of fences and the perimeter of the site (including all public parkways).
10. Any graffiti found on site must be removed within 24 hours of its appearance.
11. The applicant shall submit a demolition plan to the satisfaction of the Long Beach Building Department. Notwithstanding this subject permit, all other required permits from the Building Bureau must be secured.
12. If a gas line is located on-site approval from the Long Beach Gas Department is required. Please call (562) 570-2000 for assistance.
13. Prior to issuance of a demolition permit, the applicant shall provide proof of compliance with all local, state and government agency requirements to the satisfaction of the Director of Development Services. These agencies include the Regional Water Quality Control Board (RWQCB), the South Coast Air Quality Management District (SCAQMD), Long Beach Certified Unified Program Agency (CUPA) - Long Beach Health Department (LBHD) and the Long Beach Fire Department (LBFD), and the Department of Toxic Substances and Control (DTSC).
14. Prior to the issuance of the demolition permit the applicant shall file a separate plan check submittal to the Long Beach Fire Department for review and approval. The Long Beach Fire Department shall approve the above-ground storage tank (AST) demolition work plan. Please see contact Tim Buzbee at (562) 570-2560 for assistance.
15. Prior to issuance of a demolition permit the applicant shall submit an above-ground storage tank (AST) demolition work plan to the Long Beach Health Department for review and approval. Please call (562) 570-4000 for assistance
16. Grading and construction activities shall conform to Rule 403 of the South Coast Air Quality Management District and shall include the following:
 - a. Use water trucks and hoses to wet exposed and graded areas at least twice daily with complete coverage on all active areas and periodic wash-downs of public streets in the vicinity of all entrances and exits to the project site. Increase frequency of watering to three or more times per day whenever winds

exceed 15 miles per hour, and cease grading activities during period of winds greater than 30 miles per hour.

- b. Water material being excavated and stockpiled.
- c. Water grading and cover materials being transported.
- d. Maintain grading and construction equipment in proper tune.
- e. Schedule truck trips to avoid peak hours (7-9 a.m. and 4-6 p.m., weekdays).
- f. Discontinue construction during stage II smog alerts (ozone more than or equal to 0.35 ppm.)

17. Demolition, site preparation, and construction activities are limited to the following (except for the pouring of concrete which may occur as needed):

- a. Weekdays and federal holidays: 7:00 a.m. to 7:00 p.m.;
- b. Saturday: 9:00 a.m. - 6:00 p.m.; and
- c. Sundays: not allowed

18. Please contact the Water Department for sewer and water line information at (562) 570-2382.

19. The applicant shall obtain a permit from the California Coastal Commission for any development within the State permit jurisdiction area.

20. The berm facing Studebaker Road shall be landscaped with drought tolerant plants to the satisfaction of the Director of Development Services. Prior to the issuance of a building permit, the applicant must submit landscape plans for the discretionary approval of the Director of Development Services.

21. The developer must comply with all the mitigation measures of the applicable Environmental Review (MND 15-09). These mitigation measures, if applicable, must be printed on all plans submitted for plan review.

Mitigation and Monitoring Reporting Program

HAZARDS AND HAZARDOUS MATERIALS

HAZ-1 The applicant shall notify the LBUSD, the Rosie the Riveter School, and Kettering Elementary School of demolition activities in writing at least 7 days prior to commencement of demolition.

TRAFFIC AND CIRCULATION

T-1 The applicant shall implement traffic safety measures during truck hauling so as to reduce potential impacts to other vehicles traveling on Studebaker Road. Standard measures, including, but not limited to flag men, warning signs, and phased truck scheduling outside of peak traffic hours shall be implemented to the satisfaction of the City of Long Beach.