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Attention: TSCA § 8(e) FYI Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460



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Contains No CBI

Re: TSCA § 8(e) "FYI" Submission

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95 JUL -3 PM 2:59

Dear Sir or Madam:

We are submitting this information on behalf of our client BP Chemicals (HITCO) Inc., hereinafter referred to as BPCHI.

On June 2, 1995, BPCHI discovered the presence of various chlorinated solvents, including trichloroethylene (CASRN 79-01-6), perchloroethylene (CASRN 127-18-4), 1,2-dichloroethylene (CASRN 540-59-0), and vinyl chloride (CASRN 75-01-4), in soil and groundwater beneath its facility at 1600 West 135th Street, Gardena, California. As further discussed below, BPCHI has considered whether these data should be reported to the Agency under section 8(e) of the Toxic Substances Control Act, and concluded that they are not required to be reported. Nevertheless, BPCHI desires that the Agency be aware of the data, and thus we are submitting this report to your office on an "FYI" basis.

The presence of these chemical substances was discovered as a result of a subsurface soil investigation conducted in anticipation of selling the property. A number of groundwater samples were taken from various locations on the BPCHI site extending into a perched water table twenty-five feet below ground surface. This water table is located, in turn, fifty feet above the uppermost regional aquifer. No off-site samples have been taken, and BPCHI has no analytical data indicating that the contamination has moved off-site at this time. The level of groundwater contamination varies from sample to sample and from contaminant to contaminant. Many of the groundwater samples show contamination above the maximum contaminant level for each chemical detected.

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BPCHI believes that these soil and groundwater data would not reasonably support a conclusion that the contamination presents a substantial risk of injury to human health or the environment. First, as noted above, the contamination appears in a perched water table, and not in the aquifer. (Moreover, the uppermost aquifer itself is not a source of drinking water.) Second, the mere presence of chemical contamination in environmental media does not, by itself, constitute TSCA § 8(e) substantial risk information. *See* 58 Fed. Reg. 37,737. Third, EPA has indicated in various documents, including the March 16, 1978 Statement of Interpretation and Enforcement Policy, informal guidance distributed in connection with the recent TSCA § 8(e) Compliance Audit Program, and the July 13, 1993 TSCA § 8(e) Notice of Clarification and Solicitation of Public Comment, that such information would qualify for reporting only if it showed "widespread and previously unsuspected distribution in environmental media." Because the available data do not indicate that the contamination has migrated off-site, the contamination is not "widespread," as EPA has interpreted the term. Fourth, there is no potential for human exposure to this contamination, because the groundwater does not serve as a source of drinking water for any portion of the surrounding community. Thus, there is no appreciable risk to human health.

Finally, even if the data did qualify for reporting, a report would not be required in this case, because BPCHI is reporting the data (on this date) to several state agencies authorized by EPA to administer federally delegated programs, pursuant to mandatory reporting requirements. *See* 58 Fed. Reg. 37,792 (July 13, 1993). Such state agencies include the Los Angeles Regional Water Quality Control Board (of the State Water Resources Board), which administers the Clean Water Act, and the California Department of Toxic Substances Control ("DTSC") which administers the federal Resource Conservation and Recovery Act ("RCRA") in California.

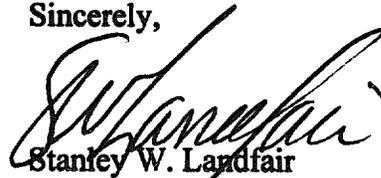
Notwithstanding that this information is not required to be reported, BPCHI is submitting to EPA the Draft Report, dated June 2, 1995, by which BPCHI received this information on approximately June 3, 1995. In this regard, we note that the submission would be timely, if EPA regarded the information as reportable under Section 8(e), under the Agency's July 13, 1993 TSCA § 8(e) Clarification, as a non-emergency report of environmental contamination submitted within thirty days of its receipt.

Aside from the issue whether the data need to be reported, the Agency should be aware that the contamination will be addressed. BPCHI anticipates that the Los Angeles Regional Water Quality Control Board will require remediation of the site and will monitor this remediation activity carefully. BPCHI expects to work closely and cooperatively with RWQCB in this effort.

Please direct any further questions regarding this information either to the undersigned, or
to:

David L. Bell
Managing Counsel
Law Department
BP America, Inc.
200 Public Square 39-5300-B
Cleveland, OH 44114-2375
Tel. 216-586-6390

Sincerely,



Stanley W. Landfair
Counsel for BP Chemicals (HITCO) Inc.

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June 2, 1995

Mr. K. E. Blower
Director, HS&E
BP America Inc.
200 Public Square
Mail Drop 7-1
Cleveland, Ohio 44114

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**SUBJECT: Preliminary Findings
Phase 2 Investigation
BP Chemicals (Hitco) Inc.
Gardena, California**

This letter presents and discusses the preliminary results of the recent field investigation program that Pilko & Associates, Inc. (Pilko) has conducted under contract to BP America as part of a Phase 2 Site Investigation at the BP Chemicals (Hitco) Inc. (hereinafter "BPCHI") manufacturing site at 1600 West 135th Street in Gardena, California. BP Chemicals is currently considering the potential divestiture of the businesses located at Gardena along with the sale of the site and improvements. In anticipation of the potential sale, BP Chemicals is performing a Phase 2 Site Investigation to identify areas where previous operations may have impacted soil or groundwater quality, assess the extent of those impacts and, if needed, facilitate the development of remediation strategies and preparation of cost estimates. Pilko is performing this Phase 2 Site Investigation in accordance with a Workplan contained in a May 19, 1995 Letter Agreement with BP America.

SCOPE OF INVESTIGATION

The Investigation included sampling of soil and/or groundwater at 25 locations across BPCHI's Gardena facility. The sampling locations are shown on Figure 1. Samples were collected using geoprobe sampling techniques by TEG of Solano Beach, California, and were analyzed by ATI, a California-certified laboratory from Phoenix, Arizona. Soil samples were obtained at 5-foot depth intervals from the surface to 20 feet below land surface. Where feasible, groundwater samples were obtained at each location. Depth to water at the site ranged from approximately 22 to 28 feet at the sampling locations.

Soil and groundwater samples were analyzed for VOCs and TPH using EPA Methods 8240 and 8015 (modified), respectively. Selected soil samples (up to two per sampling

location) have been prepared and shipped to an offsite California-certified laboratory (i.e. ATI) for analysis of SVOCs using EPA Method 8270. Results of these analyses are expected from the laboratory within one week to ten days. The sampling locations yielded insufficient volumes of water (i.e. less than one liter) for SVOC analyses. Three soil samples will be analyzed for metals by the outside laboratory. If feasible, groundwater samples from sample points P-5 and P-7 will also be analyzed by the outside laboratory for metals.

PRELIMINARY RESULTS OF SOIL AND GROUNDWATER SAMPLING

A summary of the results of laboratory analyses of soil and groundwater samples for VOCs using EPA Methods 8240 and 8015 (modified), respectively, are contained in Table 1. This table presents the reported concentrations of the four VOCs (of the 34 VOCs covered by Method 8240) that were most often detected in soil and groundwater samples at the site. The most commonly detected VOCs at the site were:

- Trichloroethene (TCE)
- 1,2-Dichloroethene (1,2-DCE)
- Tetrachloroethene (PCE)
- Vinyl Chloride

Other VOCs were reported as detected, but occurred at a much lower frequency. These additional VOCs included: 1,1,1-trichloroethane (TCA); 1,1-dichloroethane (1,1-DCA); 1,2-dichloroethane (1,2-DCA); 1,1-dichloroethene (1,1-DCE); benzene; toluene; xylenes; ethylbenzene; chloroform; and methylene chloride.

A review of the results of soil sampling indicate the presence of VOCs at concentrations generally less than 1 microgram per kilogram (mg/kg) throughout the soil column at sampling locations across much of the site. VOCs are present in concentrations generally less than 1 mg/kg at sampling locations where elevated concentrations of VOCs were also detected in groundwater samples. It is possible that the presence of VOCs in soil in these cases is caused by redistribution of VOCs onto soil from soil vapor rising off the underlying shallow groundwater. Elevated levels of VOCs were detected in shallow soil samples taken at sampling points P-1 (and confirmed by sampling at P-22) and P-4 (and confirmed by sampling at P-24 and P-25). Vinyl chloride was detected in soil samples at a 5-foot depth at concentrations of 1 to 2 mg/kg at sampling point P-4.

Figures 2 through 4, respectively, show the reported concentrations of PCE, TCE, and TCA in groundwater samples taken during the Phase 2 investigation. A review of the results of groundwater sampling indicate the presence of VOCs above regulatory limits in shallow groundwater across much of the site. For example, the California Maximum Contaminant Levels for PCE, TCE, and vinyl chloride are 5 ppb, 5 ppb and 0.5 ppb, respectively.

In general, shallow groundwater samples collected throughout the southern and northeastern portions of the site have concentrations of TCE and PCE between 200 and

Mr. K. E. Blower
June 2, 1995
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10,000 micrograms per liter (ug/l). Vinyl chloride was also detected above regulatory limits in groundwater samples from locations P-4 and P-5.

The reported concentrations of VOCs in groundwater samples should be considered as estimates of actual groundwater conditions because these were "grab samples" of very turbid groundwater collected from temporary, undeveloped wells. Nevertheless, because these concentrations exceed MCLs, there may be an obligation to report these findings to the California Regional Water Quality Control Board or other regulatory agencies.

Pilko will issue a final report concerning the Phase 2 Site Investigation around June 23, 1995. If you have any questions, please do not hesitate to call me at (713) 861-1417 or Dave Dunbar at (707) 833-5699.

FOR PILKO & ASSOCIATES, INC.

Michael D. Henke

MDH:dlk (105334.00)
Attachments

Preliminary Results of Soil and Groundwater Sampling - BP (Hico) Gardens

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-1	5	10	0.15	0.09	<0.05	<0.05	33
	10	1.1	0.06	<0.05	<0.05	<0.05	<10
	15	0.11	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	NS	NS	NS	NS	NS	NS
P-22 (5 ft. W of P-1)	5	15 (05)	0.15	0.11	<0.05	<0.05	21
	10	1.4	0.06	<0.05	<0.05	<0.05	14
	15	0.38	0.07	<0.05	<0.05	<0.05	<10
	20	0.19	<0.05	<0.05	<0.05	<0.05	<10
	25	0.17	<0.05	<0.05	<0.05	<0.05	<10
	30	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	35	0.09	<0.05	<0.05	<0.05	<0.05	<10
	GW	1,200	93	110	<10	<10	<1
P-2	5	<0.05	<0.05	0.09	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	<1	19	2	<1	TCA (7), 1,1-DCA (4)	<1
P-50	GW	3	<1	1	<1	TCA (4), 1,1-DCA (2)	<1

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Preliminary Results of Soil and Groundwater Sampling - BP (Hitco) Gardena

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-3	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	19	1	<1	<1	<1	<1
P-4	5	<0.05	0.19	<0.05	2.4	<0.05	13
	10	0.22	0.91	0.14	<0.05	<0.05	<10
	15	0.39	0.56	0.15	<0.05	<0.05	<10
	20	0.11	0.08	<0.05	<0.05	<0.05	<10
P-24 (5 ft. N)	5	0.42	16 (d5)	<0.05	1.3	<0.05	<1
	10	0.08	0.38	0.08	<0.05	<0.05	<1
P-25 (5 ft. S)	5	<0.05	2.2	<0.05	1.6	<0.05	<10
	10	<0.05	0.6	0.17	<0.05	<0.05	<10
P-4	GW	8,600 (d50)	2,700 (d50)	3,100 (d50)	770	1,1-DCA (17)	<1
	GW (B)	1,200	5,800	1,900	2,000	<100	<1

Preliminary Results of Soil and Groundwater Sampling - BP (Hitco) Gardena

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-5	5	0.98	0.09	0.09	<0.05	<0.05	<10
	10	0.86	<0.05	0.06	<0.05	<0.05	<10
	15	1.6	<0.05	0.12	<0.05	<0.05	<10
	20	0.86	<0.05	0.06	<0.05	<0.05	<10
P-6	GW	70,000 (d50)	2,500 (d100)	5,100 (d100)	220	TCA (27) 1,2-DCA (2) Others	<1
	GW (B)	40,000	1,600	2,100	<500	<500	<1
P-7	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	0.17	<0.05	<0.05	<10
	20	<0.05	<0.05	0.5	<0.05	<0.05	<10
P-8	GW	230	840	4,000 (d50)	<10	BTEX (30)	<1
	GW (B)	200	550	4,500	<50	<50	<1
P-8	5	0.08	<0.05	<0.05	<0.05	<0.05	<10
	10	0.08	<0.05	<0.05	<0.05	<0.05	<10
	15	0.12	<0.05	<0.05	<0.05	<0.05	<10
	20	0.19	<0.05	0.05	<0.05	<0.05	<10
P-8	GW	2,900 (d50)	100	1,100	<10	<10	<1
	GW (B)	420	400	460	<10	<10	<1
P-8	5	<0.05	<0.05	0.06	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
P-8	GW	420	400	460	<10	<10	<1
	GW (B)	420	400	460	<10	<10	<1

Preliminary Results of Soil and Groundwater Sampling - BP (Hilco) Gardena

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-9	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	92	2	120 (d5)	<1	<1	<1
P-10	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	0.68	<0.05	0.09	<0.05	<0.05	<10
	15	0.48	<0.05	0.05	<0.05	<0.05	<10
	20	0.88	<0.05	0.22	<0.05	<0.05	<10
	GW	16	<1	23	<1	1,1-DCE (B)	<1
P-11	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	100	51	27	<5	Chloroform (G)	<1
P-12	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	490	120	170	<5	<5	<1

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Preliminary Results of Soil and Groundwater Sampling - BP (Hitco) Gardena

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-13	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	0.35	<0.05	<0.05	<0.05	<0.05	<10
	15	0.29	<0.05	<0.05	<0.05	<0.05	<10
	20	0.28	<0.05	0.07	<0.05	<0.05	<10
	GW	<1	<1	<1	<1	Ethylbenzene (3)	3
P-14	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	44	<0.05	2	<0.05	<0.05	<1
P-15	5	0.07	<0.05	<0.05	<0.05	1,1-DCE (09) BTEX (14)	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	8	<1	<1	<1	BTEX (3)	<1
P-16	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	0.07	<0.05	<0.05	<10
	20	<0.05	<0.05	0.06	<0.05	<0.05	<10
	GW	13	1	58	<1	1,2-DCA (1), BTEX (3)	<1

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Preliminary Results of Soil and Groundwater Sampling - BP (Hitco) Gardena

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-17	5	1.6	<0.05	0.19	<0.05	<0.05	<10
	10	1.1	<0.05	0.17	<0.05	<0.05	<10
	15	5.4	<0.05	1.4	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	2,000	550	2,200	<0.05	<0.05	<1
P-18	5	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	GW	2	<0.05	<0.05	<0.05	1,1-DCE (8)	<1
P-19	5	<0.05	<0.05	0.21	<0.05	<0.05	<10
	10	<0.05	<0.05	0.34	<0.05	<0.05	<10
	15	<0.05	<0.05	0.55	<0.05	<0.05	<10
	20	<0.05	<0.05	0.09	<0.05	<0.05	<10
	GW	540	87	5,500 (d50)	<25	1,1-DCE (28)	<1
P-20	5	0.11	<0.05	1.5	<0.05	<0.05	<10
	10	<0.05	<0.05	0.14	<0.05	<0.05	<10
	15	<0.05	<0.05	1.1	<0.05	<0.05	<10
	20	<0.05	<0.05	0.94	<0.05	<0.05	<10
	GW	230	250	7,300	<100	TCA (300) 1,1-DCE (390)	<1

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Preliminary Results of Soil and Groundwater Sampling - BP (Hitco) Gardena

BORING	DEPTH (feet)	TCE (mg/kg) (ug/l)	1,2-DCE (mg/kg) (ug/l)	PCE (mg/kg) (ug/l)	VINYL CHLORIDE (mg/kg) (ug/l)	OTHER VOCs (mg/kg) (ug/l)	TPH (mg/kg)
P-21	5(a)	<0.05	<0.05	0.22	<0.05	<0.05	240
	5(b)	<0.05	<0.05	0.29	<0.05	<0.05	<10
	10	<0.05	<0.05	<0.05	<0.05	<0.05	11
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	<0.05	<0.05	<0.05	<0.05	<0.05	<10
P-52	GW	56	9.9	110	<2	<2	<1
	GW	62	12	110	<2	<2	<1
P-23	5	0.01	<0.05	<0.05	<0.05	<0.05	<10
	10	0.07	<0.05	<0.05	<0.05	<0.05	<10
	15	<0.05	<0.05	<0.05	<0.05	<0.05	<10
	20	0.43	<0.05	0.06	<0.05	<0.05	<10
Sump	GW	1,100	30	41	<10	<10	<1
	WATER	<0.05	10	0.05	<0.05	BTEX (36), TCA (20)	18

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**Preliminary Results of Soil and Groundwater Sampling
BP (Hitco) Gardena
Notes**

(1) Abbreviations used

TCE	Trichloroethene
1,2-DCE	1,2-Dichloroethene
PCE	Tetrachloroethene or Perchloroethylene
VOCs	Volatile Organic Compounds
mg/kg	Milligrams per kilogram
ug/l	Micrograms per liter
TPH	Total petroleum hydrocarbons
NS	Not Sampled
GW	Groundwater
1,1,1-TCA	1,1,1-Trichloroethane
1,1-DCA	1,1-Dichloroethane
1,2-DCA	1,2-Dichloroethane
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes
1,1-DCE	1,1-Dichloroethene

(2) Analytical testing

<0.05" Indicates that the compound was not detected at the reported detection limit, in this example, 0.05 mg/kg.

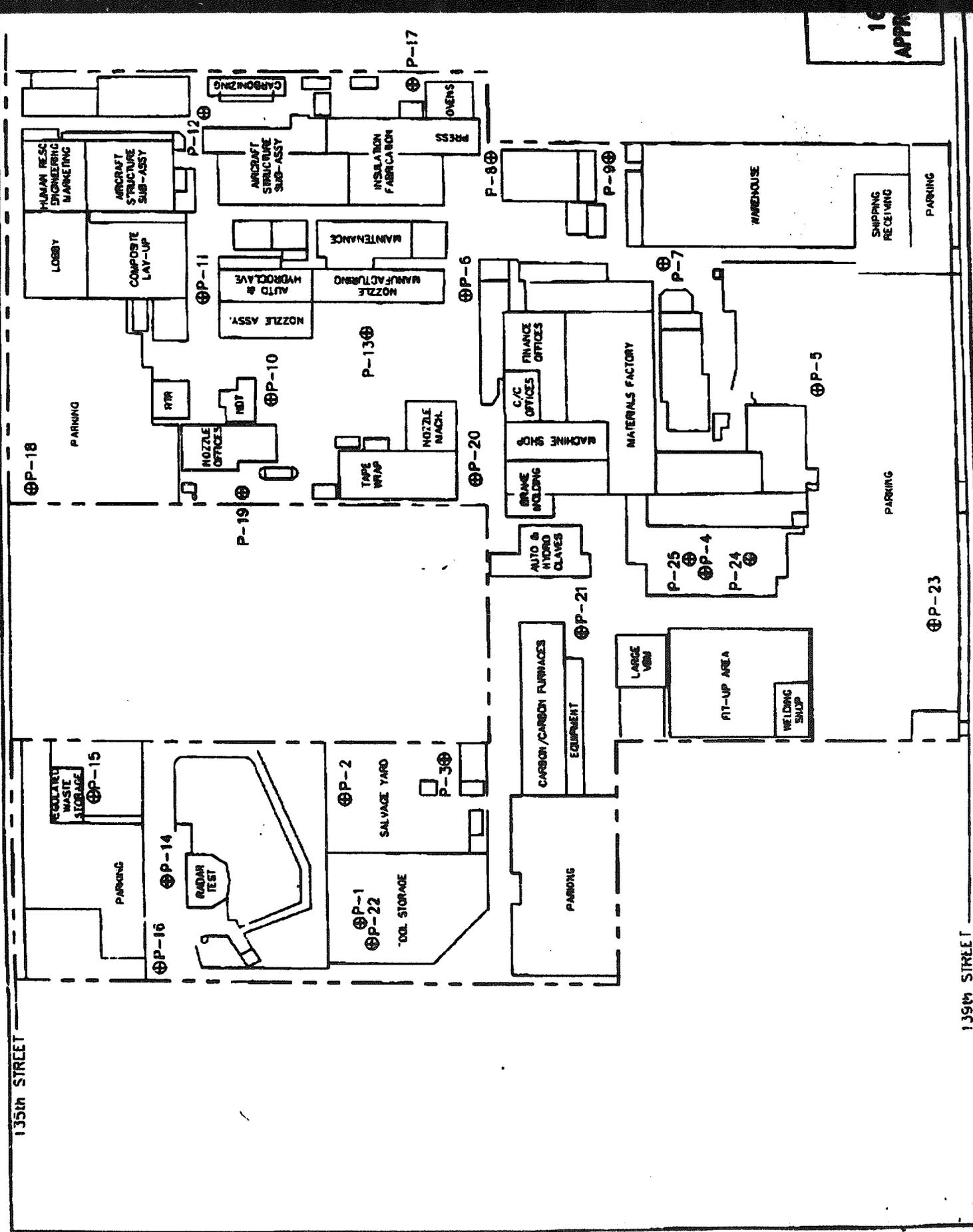
15(d5) Indicates that the concentration reported for this specific compound came from an analytical run performed using an extract with a greater dilution than was used for the rest of the 8240 compounds. In this case, the sample was diluted at a 5:1 ration prior to analysis and quantitation.

Others Indicates that additional VOCs were detected by the analytical laboratory beyond those listed in the table, but at lower concentrations.

(3) The results of soil and groundwater sampling contained in the table are preliminary. A final report will be issued by the analytical laboratory, ATI, by approximately June 10, 1995.

DRAFT

SENT BY: 6-9-95 12:33PM : PILKO & ASSOC. - 202 769 7756:#19/17 08-02-95



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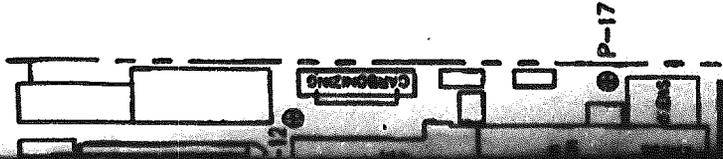
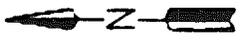
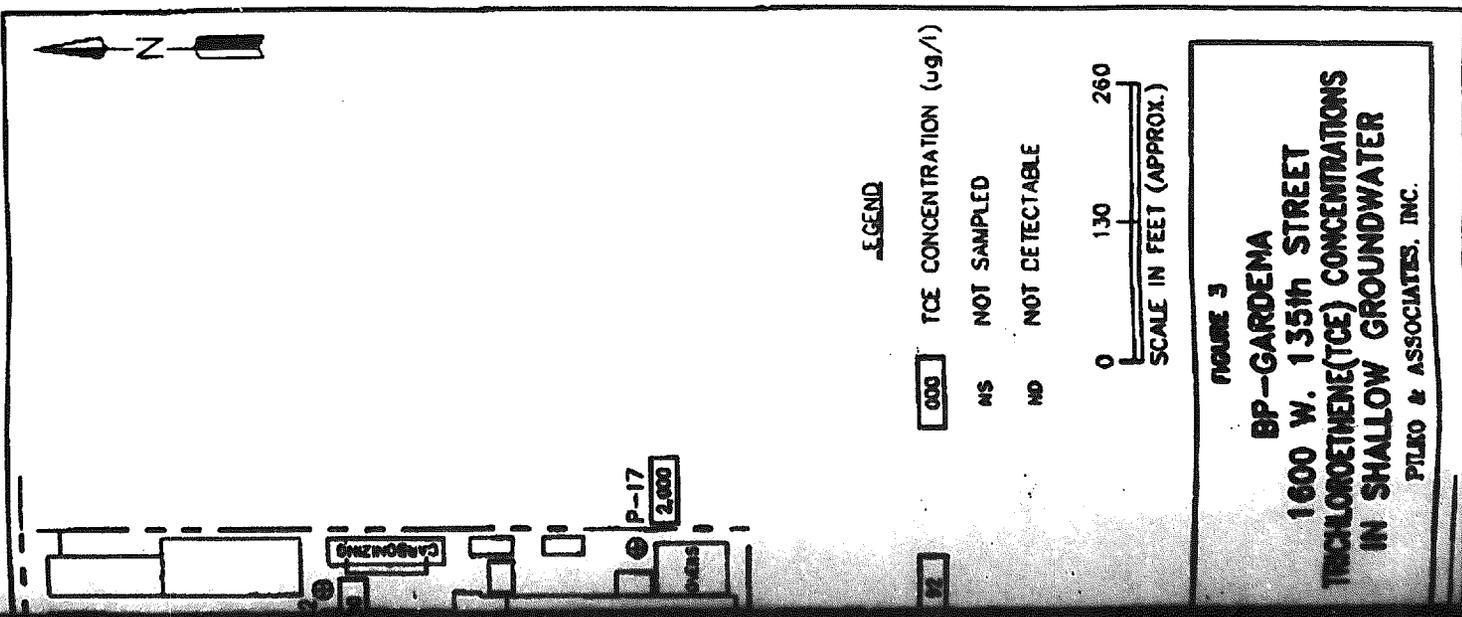


FIGURE 1
BP-GARDENA
1600 W. 135th STREET
APPROXIMATE SAMPLING LOCATIONS
FILKO & ASSOCIATES, INC.



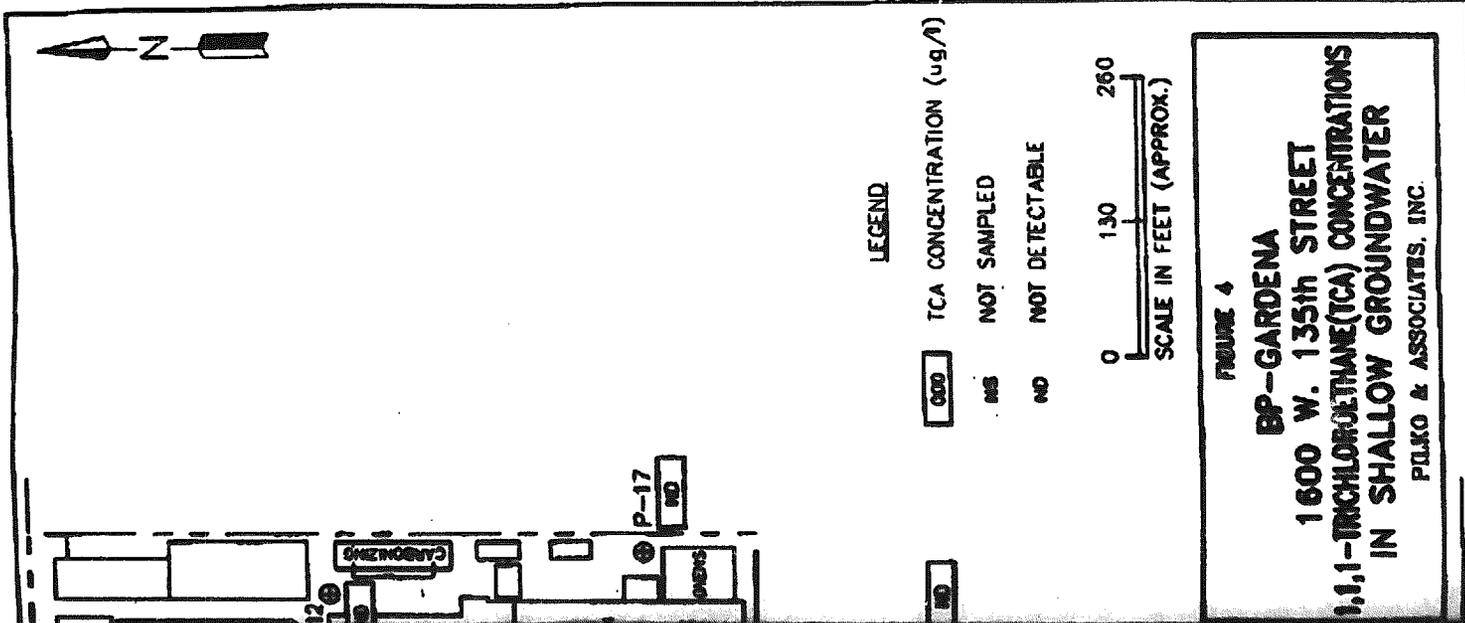
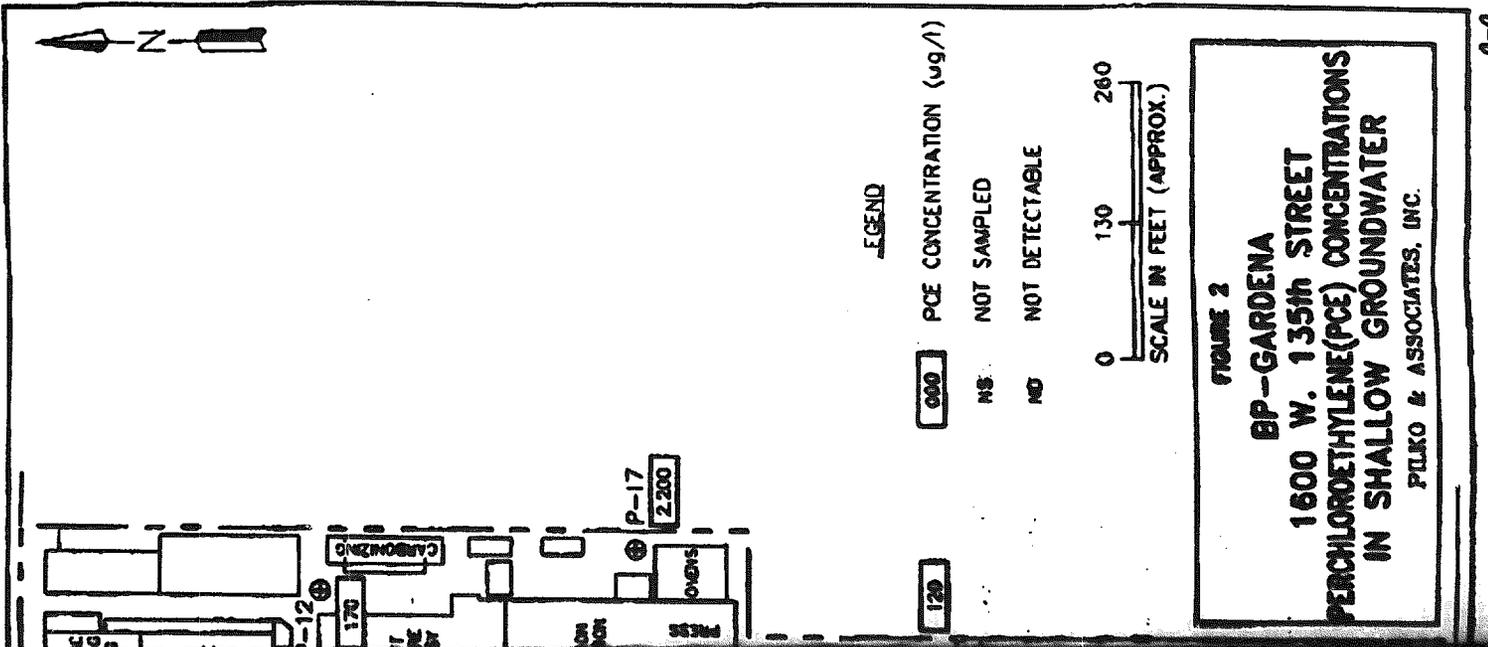


FIGURE 4
BP-GARDENA
1600 W. 135th STREET
1,1,1-TRICHLOROETHANE(TCA) CONCENTRATIONS
IN SHALLOW GROUNDWATER
PELKO & ASSOCIATES, INC.



LEGEND

120 PCE CONCENTRATION ($\mu\text{g/l}$)

NS NOT SAMPLED

ND NOT DETECTABLE

0 130 260
SCALE IN FEET (APPROX.)

FIGURE 2
BP-GARDENA
1600 W. 135th STREET
PERCHLOROETHYLENE(PCE) CONCENTRATIONS
IN SHALLOW GROUNDWATER
 PELKO & ASSOCIATES, INC.

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AVENUE LOUISE 267, BOX 7
B-1050 BRUSSELS
BELGIUM
011 (322) 648-4810

July 3, 1995

CHARLES H. POMEROY
DIRECT DIAL (213) 243-6256

Contains No CBI

Los Angeles Regional Water Quality Control Board
101 Center Plaza Drive
Monterey Park, California 91754-2156

**RE: Notification Pursuant to Water Code § 13271,
Health & Safety Code § 25359.4**

Dear Sir or Madam:

On approximately June 3, 1995, B.P. Chemicals (Hitco), Inc. ("BPCHI") discovered the presence of various chlorinated solvents including trichloroethylene, perchloroethylene, dichloroethylene, vinyl chloride and 1.1 and 1.2 dichloroethane in soil and groundwater beneath its facility at 1600 W. 135th St., Gardena, California. As further discussed below, BPCHI has considered whether these data should be reported to various state agencies under applicable state statutes and as a precautionary measure is filing this notice.

The presence of these chemical substances was discovered as a result of a subsurface soil investigation conducted by Pilko & Associates, Inc. ("Pilko"), our consultants, in anticipation of selling the property. A number of soil and groundwater samples were taken at various locations on the BPCHI site. No offsite samples have been taken and BPCHI has no analytical data indicating that the contamination has moved offsite at this time. The groundwater question appears to be a perched zone of unknown sites and continuity at approximately twenty-five feet which is at least fifty feet from the primary regional aquifer. Groundwater contamination results vary from sample to sample and from contaminant to contaminant. Several groundwater samples, however, show contamination above the maximum contaminant level for one or more of the chemicals detected.

In order to ensure that its legal reporting obligations are met, BPCHI believes it is prudent to notify your agency, as well as the California Department of Toxic Substances Control, the California Office of Emergency Services and the Los Angeles County Department of Public Works. BPCHI has no knowledge to determine whether a "reportable quantity" has been released into the environment at

Los Angeles Regional Water Quality Control Board
July 3, 1995
Page 2

the facility, nor any information identifying a specific source or a period during which the release occurred. As a precaution, however, we are disclosing this information to all of the above agencies under the assumption that in fact a "reportable quantity," as defined under Health & Safety Code § 25359.4(c)(2) and under Water Code § 13271, has been released at the facility. We have included the Los Angeles County Department of Public Works in this disclosure, since BPCHI has been actively investigating contamination from a previously removed underground storage tank and has previously disclosed to this agency the presence of chlorinated hydrocarbons in the facility's underlying groundwater.

Since BPCHI is presently unaware of the actual release site at the facility or volume released of each constituent, BPCHI contemplates immediately conducting a more thorough site assessment. BPCHI and its consultants are in the process of developing a plan for a more thorough site assessment. We would like to meet with your agency at your convenience in order to outline the next step of the assessment process. Please contact the undersigned in order to arrange a time for this meeting. We will forward the report as soon as it is available from BPCHI's consultant.

Sincerely,



Charles H. Pomeroy
Counsel for B.P. Chemicals (HITCO), Inc.

CHP/ma
Enclosure

cc: Dept. of Toxic Substances Control
Region IV
Site Mitigation Program
245 W. Broadway, Suite 425
Long Beach, CA 90802
(w/o enclosure)

Office of Emergency Services
2800 Meadowview Road
Sacramento, CA 95832
(w/o enclosure)

L. A. County Dept. of Public Works
Underground Storage Tank Program
Closure Permit No. 9243B
P.O. Box 1460
Alhambra, CA 91802-1460
(w/o enclosure)

Best Available Copy