



Los Angeles Regional Water Quality Control Board

February 19, 2026

LBB Development
Attn: Mr. Ritesh Sonea
818 Sandwood Place
San Pedro, CA 90731

Via Email Only

SUBJECT: REVIEW OF ADDITIONAL SITE ASSESSMENT REPORT

SITE: LBB DEVELOPMENT, 3061 LONG BEACH BLVD., LONG BEACH, CALIFORNIA (SCP NO. 1649, GLOBAL ID NO. T10000023381)

Dear Mr. Sonea:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board), is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the above-referenced site (Site).

On September 15, 2025, Los Angeles Water Board staff approved a workplan proposing additional Site investigation for the subsurface soil, soil vapor, and groundwater. Los Angeles Water Board staff also requested that the identified subsurface anomaly inside the auto service station suspected to be a hydraulic lift be excavated and removed. The results of the excavation and confirmational sampling were due to the Los Angeles Water Board on December 15, 2025, along with the technical report detailing the results of the additional Site investigation. The Los Angeles Water Board staff has reviewed the following document:

- Soil, Soil Vapor, and Groundwater Investigation Report, LBB Development, 3061 Long Beach Blvd. (Technical Report) dated January 2, 2026, prepared by FREY Environmental, Inc. (FREY).

SUMMARY OF TECHNICAL REPORT

On November 24, 2025, six soil borings (SV1 through SV6) were drilled to a maximum depth of 25 feet bgs, except SV1 and SV4. Due to refusal, soil samples were collected at 5 feet bgs in SV1 and SV4, and at 15 feet bgs in SV1. In an email correspondence dated January 21, 2026, FREY staff explained that SV4 had soil samples collected only at 5 feet bgs, and that due to the dense soils and crushed tips of the acetate lines, there was

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

not an adequate volume of soil for sample collection at 15 feet bgs. Soil samples were collected from each soil boring at 5-foot intervals and were analyzed for gasoline range organics (GRO) and volatile organic compounds (VOCs). Soil samples had maximum detections of GRO at 1,150 milligrams per kilogram (mg/kg), naphthalene at 57.4 mg/kg, 1,2,4-trimethylbenzene at 47.8 mg/kg, total xylenes at 0.849 mg/kg, and more.

On November 24, 2025, soil vapor probes were installed in each soil boring at depths of 5, 15, and 25 feet bgs, except for SV1 and SV4, which were installed at 5, 15, and 20 feet bgs. Soil vapor samples were collected from each soil vapor probe and were analyzed for GRO and VOCs, including fuel oxygenates, and naphthalene. Soil vapor samples had maximum detections of GRO at 14,998,892 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), tetrachloroethene (PCE) at 412 $\mu\text{g}/\text{m}^3$, total xylenes at 884,955 $\mu\text{g}/\text{m}^3$, toluene at 28,974 $\mu\text{g}/\text{m}^3$, naphthalene at 2,509 $\mu\text{g}/\text{m}^3$, and more.

On November 24, 2025, one soil boring (GW1) was drilled at the Site and was meant to be drilled to 45 feet bgs but met refusal at 25 feet bgs due to tight soils. On December 2, 2025, GW1 was attempted again and was drilled to a depth of 43 feet bgs. Soil samples were collected at 5-foot intervals to a depth of 35 feet bgs. A temporary well was installed in the soil boring, and a grab groundwater sample was collected at a depth of approximately 38 feet bgs. The grab groundwater sample was analyzed for GRO and VOCs, including fuel oxygenates and naphthalene. The grab groundwater sample was not detected for GRO or VOCs.

Frey proposes that petroleum constituents detected in soil, soil vapor, and groundwater meet the Low Threat Closure Policy, and that the detected PCE in soil vapor is from an off-Site source. Furthermore, Frey recommends installing a vapor barrier below a newly installed concrete slab, submitting a soil management plan prior to the redevelopment of the Site, and implementing a Land Use Covenant (LUC) to prohibit the use of groundwater and require agency approval for soil disturbance below a certain depth.

LOS ANGELES WATER BOARD COMMENTS AND REQUESTS

Based upon the review of the Technical Report and available information in the case files, Los Angeles Water Board staff have the following comments and requests:

1. Further Site assessment is needed to delineate the extent of contamination present off-Site. Based on the soil vapor data collected to date, PCE has not been fully characterized. All soil vapor samples collected in SV1 through SV6 had detections of PCE above its respective regulatory screening level. PCE concentrations in soil vapor samples ranged between 89 $\mu\text{g}/\text{m}^3$ and 412 $\mu\text{g}/\text{m}^3$ at depths of 5, 15, 20, and/or 25 feet bgs. Additional investigation(s) are warranted to fully delineate the lateral extent of chlorinated VOCs, such as PCE, in soil vapor at the Site. A workplan for additional Site investigation(s) for the subsurface soil vapor should be submitted to the Los Angeles Water Board via GeoTracker by **April 20, 2026**.

2. Additional grab groundwater samples are needed to fully assess the Site. Due to the wide distribution of chlorinated VOCs, such as PCE, in soil vapor throughout the Site, there is insufficient data to make a determination whether groundwater is impacted near SV5, SV6, and west of SV1. Additional investigation(s) are warranted to fully characterize the groundwater beneath the PCE soil vapor plume. A workplan for additional Site investigation for groundwater should be submitted to the Los Angeles Water Board via GeoTracker by **April 20, 2026**. The workplan for additional Site investigation(s) for soil vapor and groundwater may be combined into a single document.
3. Based on the soil and soil vapor data collected to-date, detections of chlorinated VOCs, such as PCE, are more evenly distributed across the Site, while petroleum VOCs are centered in the vicinity of the former gasoline underground storage tank (UST). Soil samples collected from SV2, near the former gasoline UST, had detections of GRO at 1,150 mg/kg, toluene at 0.002 mg/kg, ethylbenzene at 0.0527 mg/kg, total xylenes at 0.849 mg/kg, and naphthalene at 57.4 mg/kg. Soil vapor samples collected from SV2, near the former gasoline UST, had detections of GRO at 14,998,892 $\mu\text{g}/\text{m}^3$, toluene at 28,974 $\mu\text{g}/\text{m}^3$, ethylbenzene at 189,314 $\mu\text{g}/\text{m}^3$, total xylenes at 884,955 $\mu\text{g}/\text{m}^3$, and naphthalene at 2,509 $\mu\text{g}/\text{m}^3$. Due to the elevated petroleum VOCs detected near the former gasoline UST, the Site Cleanup Program has referred the petroleum portion of the Site associated with the former gasoline UST to the Los Angeles Water Board's UST Program. **If you have any questions regarding the UST portion of the Site, please contact Ms. Ann Lin, San Gabriel Watershed and the Port of Long Beach Supervisor in the UST Program at (213) 576-6702 or via email at ann.linn@waterboards.ca.gov.**
4. The results of the subsurface anomaly removal and confirmational sampling were due to the Los Angeles Water Board by December 15, 2025. No submittals of the subsurface anomaly removal have been submitted to the Los Angeles Water Board to date. Los Angeles Water Board staff noticed the anomaly removal was missing from the Technical Report and inquired further about the matter to FREY via email correspondence. In response on January 5, 2026, FREY proposed to postpone the subsurface anomaly removal until redevelopment commences as there are already plans to remove the existing asphalt/concrete. The purpose of postponing the removal is to save costs associated with the task. Los Angeles Water Board staff concur with postponing the subsurface anomaly removal until redevelopment commences.
 - a. Please provide Los Angeles Water Board staff a minimum of 10 days advance notice by email (Amanda.Davatolhagh@waterboards.ca.gov) prior to commencing any field work.
 - b. As stated in the regulatory letter dated September 15, 2025, if the hydraulic lift is confirmed to be present, it must be excavated and removed. Furthermore, confirmational sampling should be conducted beneath the anomaly after its removal, and the analysis should include the full suite of

VOCs per EPA Method 8260B. A technical report detailing the subsurface anomaly investigation is due to Los Angeles Water Board staff **60 days** after earthwork activities have begun at the Site.

5. As presented in State Water Resources Control Board Resolution 92-49, professionals should be qualified, licensed where applicable, and competent and proficient in the fields pertinent to the required activities. Moreover, the final report submitted to the Los Angeles Water Board should be reviewed, signed, and stamped by a California-registered geologist, or a California-registered civil engineer with at least five years of hydrogeologic experience. Furthermore, the California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Therefore, all future work should be performed by or under the direction of a registered geologist or registered civil engineer. A statement is requested in the final report that the registered professional in responsible charge actually supervised or personally conducted all the work associated with the final report.

REGULATORY REQUIREMENT FOR ELECTRONIC SUBMISSION OF LABORATORY DATA TO THE STATE GEOTRACKER DATABASE

Chapter 30, Division 3 of Title 23 of California Code of Regulations (CCR) requires persons responsible for submitting reports to ensure the electronic submission of laboratory analytical data (i.e., soil or water chemical analysis) and locational data (i.e., location and elevation of groundwater monitoring wells) via the Internet to the State Water Resources Control Board's GeoTracker database. The regulations and other background information regarding GeoTracker, and electronic submission of data are available at https://www.waterboards.ca.gov/ust/electronic_submission/.

In accordance with the regulations, the following information must be uploaded to the State Water Resources Control Board's GeoTracker database: reports and work plans (in PDF format), laboratory analytical data (in electronic data format [EDF]), monitoring event information in GEO_WELL format, an updated site map (GEO_MAP) showing any monitoring well locations, boring logs in PDF (GEO_BORE) to be used to link to well locations, monitoring well latitude and longitude (GEO_XY) survey data, and well elevation data (GEO_Z). EDF files shall be formatted in accordance with current EDF guidance letters available at <https://geotracker.waterboards.ca.gov/edfletters/>.

If you have any questions regarding this letter, please contact Ms. Amanda Davatolhagh, Engineering Geologist at (213) 576-6748 or via email at Amanda.Davatolhagh@waterboards.ca.gov or contact Ms. Anita Fang, Unit VI Supervisor, at (213) 576-6730 or via email at Xiao-Xue.Fang@waterboards.ca.gov.

Sincerely,

Amanda Davatolhagh
Engineering Geologist
Site Cleanup Program Unit VI

cc (via email):

Jack Frey, FREY