



Los Angeles Regional Water Quality Control Board

June 26, 2020

Hanukah, Inc.
Attn: Mr. Vahid Vahdat
25808 South Narbonne Avenue
Lomita, CA 90717

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO.: 7019 0700 0001 9921 1676

UNDERGROUND STORAGE TANK PROGRAM – NOTICE OF VIOLATION

**PACIFIC SHELL SERVICE STATION (FORMER SAFAR EXXON-MOBIL AND MOBIL SERVICE STATION #18-MRC)
25808 SOUTH NARBONNE AVENUE, LOMITA
(CASE NO. I-05152C) (GLOBAL ID NO. T10000013273)**

Dear Mr. Vahdat,

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within the Los Angeles and Ventura counties. As such, the Los Angeles Regional Board is the lead regulatory agency for overseeing corrective actions (assessment and/or monitoring activities) and cleanup of releases from leaking underground storage tank (UST) systems at the subject site (Site).

Pursuant to Health and Safety Code Section 25296.10, Hanukah, Inc. (in addition to ExxonMobil Oil Corporation [ExxonMobil] and Petroleum Management & Marketing) is required to take corrective actions (i.e. Preliminary Site Assessment, Soil and Water Investigation, Corrective Action Plan Implementation, and Verification Monitoring) to ensure protection of human health, safety, and the environment. Corrective action requirements are set forth in California Code of Regulations (CCR), Title 23, Chapter 16, Sections 2720 through 2727.

In a directive letter dated December 16, 2019 (copy enclosed), the Los Angeles Regional Board approved two work plans (one submitted by ETIC on behalf of ExxonMobil and the other by Ramtox Corporation on behalf of Hanukah, Inc.) for site investigations and required Hanukah, Inc., ExxonMobil, and Petroleum Management & Marketing to submit a technical report detailing the results of the site investigation by March 16, 2020. ExxonMobil's consultant completed the field activities they proposed and submitted their technical report on March 16, 2020. The Los Angeles Regional Board has not received a technical report from Hanukah, Inc., or their consultant, detailing results of the site investigation they proposed in their work plan.

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

YOU ARE HEREBY NOTIFIED that you are in violation of Health and Safety Code Section 25296.10 and CCR, Title 23, Chapter 16, Section 2723 by failing to provide the technical report detailing results of the site investigation activities by the due date of March 16, 2020.

You are required to submit the required technical report, immediately.

Enforcement

Pursuant to Health and Safety Code section 25299, subdivision (d), any person who violates any corrective action requirement established by, or issued pursuant to, section 25296.10 is liable for a civil penalty of not more than ten thousand dollars (\$10,000) for each underground storage tank for each day of violation. A civil penalty may be imposed by civil action pursuant to Health and Safety Code section 25299, subdivision (d)(2) or imposed administratively by the Los Angeles Regional Board pursuant to California Water Code (CWC) sections 13323 through 13328. The Los Angeles Regional Board may also request that the Attorney General seek judicial civil liabilities or injunctive relief pursuant to CWC sections 13264, 13304, and 13340. The Los Angeles Regional Board reserves its rights to take any further enforcement action authorized by law.

Compliance with the action set forth in the Notice of Violation does not affect the Los Angeles Regional Board's authorization to take enforcement action against you for any of the violations noted herein.

If you have any questions regarding this matter, please contact Dr. Weixing Tong at (213) 576-6715 or at weixing.tong@waterboards.ca.gov, or Mr. James W. Ryan IV at (213) 576-6711 or at jamesw.ryan@waterboards.ca.gov.

Sincerely,

Hugh Marley
Assistant Executive Officer

Enclosure: Los Angeles Regional Board Directive dated December 16, 2019

cc: Ric Roda, State Water Resources Control Board, Division of Drinking Water
Brian Partington, Water Replenishment District of Southern California
Tim Smith, Los Angeles County Department of Public Works,
Environmental Program Division
Carla Dillon, City of Lomita, Department of Public Works
Marla D. Madden, ExxonMobil Oil Corporation
Bharat Bhattarai, Agent for Service of Process for Petroleum Management &
Marketing
Ryan Haughy, ETIC
George Zoumalan, Ramtox Corporation