

## State Water Resources Control Board

### UST CASE CLOSURE REVIEW SUMMARY REPORT

#### Agency Information

Agency Name: Stanislaus County Environmental Health Department (County)	Address: 3800 Cornucopia Way, Suite C Modesto, CA 95358
Agency Caseworker: Amber Minami	Case No.: 4

#### Case Information

USTCF Claim No.: 8214	GeoTracker Global ID: T0609900034
Site Name: Bill's Repair, Short Property	Site Address: 1825 Spokane Street Modesto, CA 95358
Responsible Party: Short Family Investment Co. Attn: Elva Jane Peeler	Address: P.O. Box 36 Loyalton, CA 96118
USTCF Expenditures to Date: \$516,262	Number of Years Case Open: 28

To view all public documents for this case available on GeoTracker use the following URL.  
[http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0609900034](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0609900034)

#### Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case meets all of the required criteria of the Policy. Highlights of the case follow:

This Site is a vacant lot. An unauthorized release was reported in September 1986 following the removal of four USTs (three gasoline and one waste oil) and an unknown volume of impacted soil was excavated to a depth of 10 feet below ground surface (bgs) and disposed offsite. Soil vapor extraction and air sparging were conducted intermittently between October 2012 and August 2014, which reportedly removed 11,389 pounds of total petroleum hydrocarbons as gasoline (TPHg). Since 1989, six groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the projected plume boundary. No other water supply wells have been identified within 1,000 feet of the projected plume boundary in files reviewed. The unauthorized release is located within the service area of a public water system, as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected shallow groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting. Remaining petroleum hydrocarbon constituents are limited and stable, and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

### Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the projected plume boundary. The dissolved concentration of benzene is less than 3,000 micrograms per liter ( $\mu\text{g/L}$ ) and the dissolved concentration of methyl tert-butyl ether (MTBE) is less than 1,000  $\mu\text{g/L}$ .
- Vapor Intrusion to Indoor Air: Onsite, the case meets Policy Criterion 2a by Scenario 3a. The maximum benzene concentration in groundwater is less than 100  $\mu\text{g/L}$ . The minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 milligrams per kilogram (mg/kg) of TPH. The plume extends offsite to the north; offsite land use to the north is residential. Offsite, the case also meets Policy Criterion 2a by Scenario 3a
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

### Objections to Closure and Responses

According to the Path to Closure page in GeoTracker, finalized on May 29, 2014, the County staff identified the following impediments to closure:

- Comment: Free product has not been removed to the maximum extent practicable.  
Response: Groundwater monitoring reports have never reported the presence of measurable amounts of free product. The historic and recent dissolved petroleum hydrocarbon concentrations in groundwater do not support its presence either.
- Comment: Secondary source has not been removed to the extent practicable.  
Response: Secondary source is defined by the Policy as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Contaminated soil was excavated to 10 feet bgs during the UST removal activities in 1986. Additionally, active soil vapor extraction/air sparging removed a reported 11,389 pounds of TPHg. The recent groundwater monitoring data do not support the presence of a significant mass of petroleum hydrocarbons remaining in the soil.
- Comment: The case does not meet Policy vapor criteria.  
Response: Both onsite and offsite the case meets Policy Criterion 2a by Scenario 3a, which requires the benzene concentration in groundwater to be less than 100  $\mu\text{g/l}$ , a minimum depth to groundwater of 5 feet, and the presence of at least 5 feet of soil with TPHg concentrations less than 100 mg/kg. Ten feet of clean fill was brought in to replace the affected soil removed from the UST excavation. In addition, there are no fixed structures onsite into which vapors could intrude. Offsite shallow soil has not been

Bill's Repair, Short Property  
1825 Spokane Street, Modesto  
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affected, the depth to groundwater is approximately 40 feet, and benzene concentrations offsite are well below 100 µg/l, therefore offsite conditions also meet Policy Criterion 2a by Scenario 3a.

- Comment: A nuisance exists.  
Response: For a nuisance to exist it has to meet all three of the following requirements:
  - Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of the property, so as to interfere with comfortable enjoyment of life or property.
  - Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
  - Occurs during, or as the result of, the treatment or disposal of wastes.This case does not meet any of these three conditions therefore a nuisance does not exist as defined in the Policy.

#### **Determination**

Based on the review performed in accordance with Health & Safety Code Section 25299.39.2 subdivision (a), the Fund Manager has determined that closure of the case is appropriate.

#### **Recommendation for Closure**

Based on available information, residual petroleum hydrocarbons at the Site do not pose a significant risk to human health, safety, or the environment, and the case meets the requirements of the Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board is conducting public notification as required by the Policy. Stanislaus County has the regulatory responsibility to supervise the abandonment of monitoring wells.



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Lisa Babcock, P.G. 3939, C.E.G. 1235



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Date

Prepared by: Kirk Larson, P.G.