

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2014-0171 – UST

In the Matter of Underground Storage Tank Case Closure

**Pursuant to Health and Safety Code Section 25296.10 and the Low Threat
Underground Storage Tank Case Closure Policy**

BY THE EXECUTIVE DIRECTOR¹:

By this order, the Executive Director directs closure of the underground storage tank (UST) case at the site listed below, pursuant to section 25296.10 of the Health and Safety Code². The name of the Underground Storage Tank Cleanup Fund (Fund) claimant, the site name, the site address, the Fund claim number, the lead agency, and case number are as follows:

**Moller Investment Group, Inc.
USA Petroleum #218
807 Cecil Avenue, Delano
Fund Claim No. 11856**

**Central Valley Regional Water Quality Control Board
Agency Case Number 5T15000654**

I. STATUTORY AND PROCEDURAL BACKGROUND

Upon review of a UST case, the State Water Resources Control Board (State Water Board) may close or require closure of a UST case where unauthorized release has occurred, if the State Water Board determines that corrective action at the site is in compliance with all of the requirements of subdivisions (a) and (b) of section 25296.10

¹ State Water Board Resolution No. 2012-0061 delegates to the Executive Director the authority to close or require the closure of any UST case if the case meets the criteria found in the State Water Board's Low Threat Underground Storage Tank Case Closure Policy adopted by State Water Board Resolution No. 2012-0016.

² Unless otherwise noted, all references are to the Health and Safety Code.

The State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure of a UST case. Closure of a UST case is appropriate where the corrective action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with: 1) Chapter 6.7 of Division 20 of the Health and Safety Code and implementing regulations; 2) Any applicable waste discharge requirements or other orders issued pursuant to Division 7 of the Water Code; 3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

State Water Board staff has completed a review of the UST case identified above, and recommends that this case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Review Summary Report has been prepared for the case identified above and the bases for determining compliance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closures (Low-Threat Closure Policy or Policy) are explained in the Case Closure Review Summary Report.

A. Low-Threat Closure Policy

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low threat to human health, safety and the environment and are appropriate for closure under Health and Safety Code section 25296.10. The Policy provides that if a regulatory agency determines that a case meets the general and media-specific criteria of the Policy, then the regulatory agency shall notify responsible parties and other specified interested persons that the case is eligible for case closure. Unless the regulatory agency revises its determination based on comments received on the proposed case closure, the Policy provides that the agency shall issue a closure letter as specified in Health and Safety Code section 25296.10. The uniform closure letter may only be issued after the expiration of the 60-day comment period, proper destruction or maintenance of monitoring wells or borings, and removal of waste associated with investigation and remediation of the site.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a uniform closure letter or a Letter of Commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied.

II. FINDINGS

Based upon the UST Case Closure Review Summary Report prepared for the case attached hereto, the State Water Board finds that corrective action taken to address the unauthorized release of petroleum at the UST release site identified as:

Claim No. 11856

USA Petroleum #218

ensures protection of human health, safety and the environment and is consistent with Chapter 6.7 of Division 20 of the Health and Safety Code and implementing regulations, the Low-Threat Closure Policy and other applicable water quality control policies and applicable water quality control plans.

The unauthorized release from the UST consisted only of petroleum. This order directs closure for the petroleum UST case at the site.³

Pursuant to the Low-Threat Closure Policy, notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60-day comment period has been provided to notified parties, and any comments received have been considered by the Board in determining that the case should be closed.

Pursuant to section 21080.5 of the Public Resources Code, environmental impacts associated with the adoption of this Order were analyzed in the substitute environmental document (SED) the State Water Board approved on May 1, 2012. The SED concludes that all environmental effects of adopting and implementing the Low threat Closure Policy are less than significant, and environmental impacts as a result of complying with the Policy are no different from the impacts that are reasonably foreseen as a result of the Policy itself. A Notice of Decision was filed August 17, 2012. No new environmental impacts or any additional reasonably foreseeable impacts beyond those that were not addressed in the SED will result from adopting this Order.

Corrective action for the site did not require the installation of wells or borings, or the regulatory agency that is responsible for oversight of the UST case has notified the State Water Board that wells and borings at the site have been properly destroyed or the owner of the real property on which the well or boring is located has certified that the wells and borings will be maintained in accordance with local or state requirements.

³ This order addresses only the petroleum UST case for the site. This order does not affect any order or directive requiring corrective action for non-petroleum contamination, if non-petroleum contamination is present.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Board (Regional Water Board) pursuant to Division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to Division 7 of the Water Code, or directives issued by a Local Oversight Program agency for this case should be rescinded to the extent they are inconsistent with this Order.

III. ORDER

IT IS THEREFORE ORDERED that:

- A. The UST case for the site identified in Section II of this Order, meeting the general and media-specific criteria established in the Low-Threat Closure Policy, be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a uniform closure letter, the Fund claimant is ordered to:
 - 1. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and
 - 2. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case for the site identified in Section II of this Order that the tasks in subparagraph (1) have been completed.

- B. The tasks in subparagraph (1) of paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299, subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.

- C. Within 30 days of receipt of proper documentation from the Fund claimant that requirements in subparagraph (1) of paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case for the site identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.

- D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to paragraph (C), the Deputy Director of the Division of Financial Assistance shall issue a closure letter consistent with Health and Safety Code section 25296.10, subdivision (g) and upload the closure letter and UST Case Closure Review Summary Report to GeoTracker.

- E. Pursuant to section 25299.57, subdivision (l)(1), and except in specified circumstances, all claims for reimbursement of corrective action costs must be received by the Fund within 365 days of issuance of the uniform closure letter in order for the costs to be considered.

- F. Any Regional Water Board or Local Oversight Program Agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case for the site identified in Section II is rescinded, but only to the extent the Regional Water Board order or Local Oversight Program Agency directive is inconsistent with this Order.



Executive Director

10/15/2014

Date



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Central Valley Regional Water Quality Control Board, Fresno (Regional Water Board)	Address: 1685 E Street, Fresno, CA 93706
Agency Caseworker: John Whiting	Case No.: 5T15000654

Case Information

USTCF Claim No.: 11856	Global ID: T0602900625
Site Name: USA Petroleum #218	Site Address: 807 Cecil Avenue, Delano, CA 93215
Responsible Party: Moller Investment Group, Inc. Attn: Charles Miller	Address: 6591 Collins Dr., #E-11 Moorpark, CA 93021
USTCF Expenditures to Date: \$307,945	Number of Years Case Open: 17

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0602900625

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:

An unauthorized release was reported in April 1995. In December 2006, three 12,000-gallon USTs were removed, and 500 cubic yards of impacted soil were excavated and disposed offsite. No active remediation has been conducted at the Site. According to groundwater data, water quality objectives have nearly been achieved.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public supply wells or surface water bodies within 250 feet of the defined plume boundary. No other water supply wells have been identified within 250 feet of the defined plume boundary in files reviewed. Water is provided to water users near the Site by the City of Delano. The affected groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected 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 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary
- Vapor Intrusion to Indoor Air: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk.
- 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.

Objections to Closure and Responses

By June 6, 2013, letter, the Regional Water Board stated it opposed closure of this case because:

- An adequate conceptual site model has not been completed.
RESPONSE: Adequate information is available in GeoTracker to prepare a conceptual site model sufficient to determine whether the case meets the Policy criteria.
- Secondary source has not been removed to the extent practical.
RESPONSE: As defined by the Policy, "Secondary source" is defined as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Soil Excavation conducted in 2006 removed the secondary source to the extent practicable.

Determination

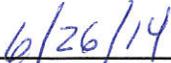
Based on the review performed in accordance with Health & Safety Code Section 25296.10 subdivision (a), the Fund Manager has determined that closure of the case is appropriate.

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. Kern County has the regulatory responsibility to supervise the abandonment of monitoring wells.



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



Date

Prepared by: Abdul Karim Yusufzai

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The case complies with the State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the site do not pose significant risk to human health, safety, or the environment.

The case complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<p>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST site closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If so, was the corrective action performed consistent with any order?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p><u>General Criteria</u> General criteria that must be satisfied by all candidate sites:</p> <p>Is the unauthorized release located within the service area of a public water system?</p> <p>Does the unauthorized release consist only of petroleum?</p> <p>Has the unauthorized (“primary”) release from the UST system been stopped?</p> <p>Has free product been removed to the maximum extent practicable?</p> <p>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

<p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Nuisance as defined by Water Code section 13050 does not exist at the site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria:</p> <p>1. Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p> <p>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>2. Petroleum Vapor Intrusion to Indoor Air: The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p>Is the site an active commercial petroleum fueling facility? Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>3. Direct Contact and Outdoor Air Exposure: The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p> <p>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?</p> <p>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

ATTACHMENT 2: SUMMARY OF BASIC CASE INFORMATION (Conceptual Site Model)

Site Location/History

- The Site is a convenience store, carwash, and commercial petroleum fueling facility.
- The Site is bounded by businesses across Inyo Street to the west, businesses to the north and east, and businesses across Cecil Avenue to the south. The local land use is commercial.
- Site maps showing the location of the former USTs, monitoring wells, groundwater level contours, and contaminant concentrations are provide at the end of this closure review (Stratus Environmental, Inc., 2008).
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: April 1995.
- Status of Release: USTs replaced.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1-3	12,000	Gasoline	Removed	December 2006
4-6	?	Gasoline	Active	-

Receptors

- GW Basin: San Joaquin Valley – Kern County.
- Beneficial Uses: Regional Water Board Basin Plan lists irrigation, municipal and domestic supply.
- Land Use Designation: Commercial.
- Public Water System: City of Delano.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by the California Department of Public Health within 250 feet of the defined plume boundary. No other water supply wells were identified within 250 feet of the defined plume boundary in the files reviewed.
- Distance to Nearest Surface Water: There is no identified surface water within 250 feet of the defined plume boundary.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by interbedded and intermixed sand, silt, and clay.
- Maximum Sample Depth: 80 feet bgs.
- Minimum Groundwater Depth: 61.23 feet bgs at monitoring well MW-4.
- Maximum Groundwater Depth: >80 feet bgs.
- Current Average Depth to Groundwater: >80 feet bgs.
- Saturated Zones(s) Studied: Approximately 60 to 80 feet bgs.
- Appropriate Screen Interval: Yes.
- Groundwater Flow Direction: Historically, west with an average gradient of 0.04 feet/foot.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (06/15/12)
MW-1	December 1996	30-80	Dry
MW-2	December 1996	60-80	Dry
MW-3	October 1998	60-80	Dry
MW-4	July 2001	30-80	Dry
MW-5	July 2001	60-80	Dry
MW-6	July 2001	60-80	Dry
MW-7	July 2001	60-80	Dry
MW-8	July 2001	60-80	Dry
MW-9	July 2001	60-80	Dry
MW-10	November 2003	60-80	79.77

Remediation Summary

- Free Product: None reported in GeoTracker.
- Soil Excavation: An estimated 500 cubic yards of impacted soil were removed and disposed offsite in 2006.
- In-Situ Soil Remediation: Soil vapor extraction pilot tests were conducted in April 2009. The removal rate was estimated to be 116 pounds of TPHg per day.
- Groundwater Remediation: No groundwater remediation has been conducted.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs [mg/kg (date) sample ID]	Maximum 5-10 feet bgs [mg/kg (date) sample ID]
Benzene	<0.007 (03/21/13) B-3-5	<0.0083 (03/21/13) B-3-10
Ethylbenzene	<0.007 (03/21/13) B-3-5	<0.0083 (03/21/13) B-3-10
Naphthalene	<0.056 (03/21/13) B-3-5	<0.066 (03/21/13) B-3-10
PAHs	NA	NA

NA: Not Analyzed, Not Applicable or Data Not Available

mg/kg: Milligrams per kilogram, parts per million

<: Not detected at or above stated reporting limit

PAHs: Polycyclic aromatic hydrocarbons

Only one of fourteen soil samples collected from a depth between 0 and 5 feet bgs slightly exceeded the Table 1 Commercial threshold for ethylbenzene while 13 samples were either below the Table 1 threshold or below detection limits.

Most Recent Concentrations of Petroleum Constituents in Groundwater

Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	1,2 DCA (µg/L)
MW-1	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5	<1
MW-2	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	8.82	<5	<1
MW-3	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	3.96	<5	1.37
MW-4	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	3.89	<5	1.03
MW-5	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5	<1
MW-6	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5	<1
MW-7	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	3.60	<5	<1
MW-8	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5	<1
MW-9	08/26/08	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5	<1
MW-10	08/26/08	369	11.3	11	8.19	79.8	68.2	<5	81.3
WQOs	-	5	0.15	42	29	17	5	1,200^a	0.5

NA: Not Analyzed, Not Applicable or Data Not Available

µg/L: micrograms per liter, parts per billion

<: Not detected at or above stated reporting limit

TPHg: Total petroleum hydrocarbons as gasoline

MTBE: Methyl tert-butyl ether

TBA: Tert-butyl alcohol

1,2 DCA: 1,2 Dichloroethane

WQOs: Water Quality Objectives, Regional Water Board Basin Plan

^a: California Department of Public Health, Response Level

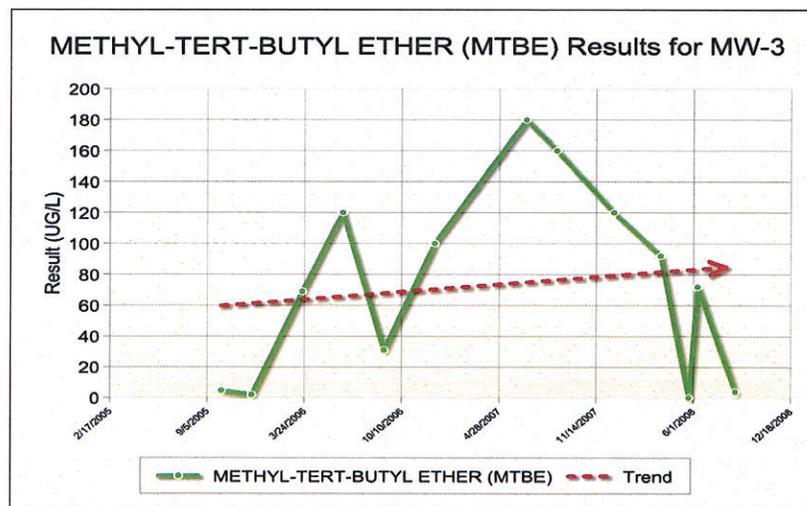
*All wells were dry during the reporting period

Groundwater Trends

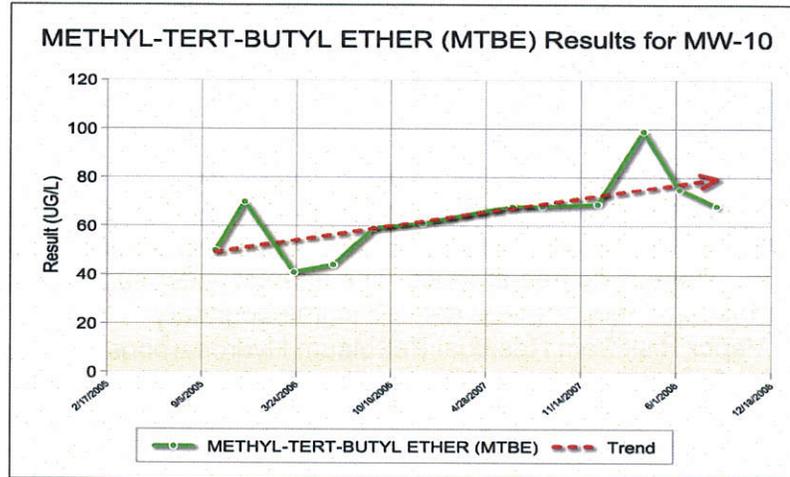
There are 12 years of groundwater monitoring data for this case, no groundwater data since 2008.

Methyl tert-butyl ether (MTBE) trends are shown below: Source Area (MW-3 and MW-10), Near Downgradient Area (MW-4), and Far Downgradient Area (MW-7).

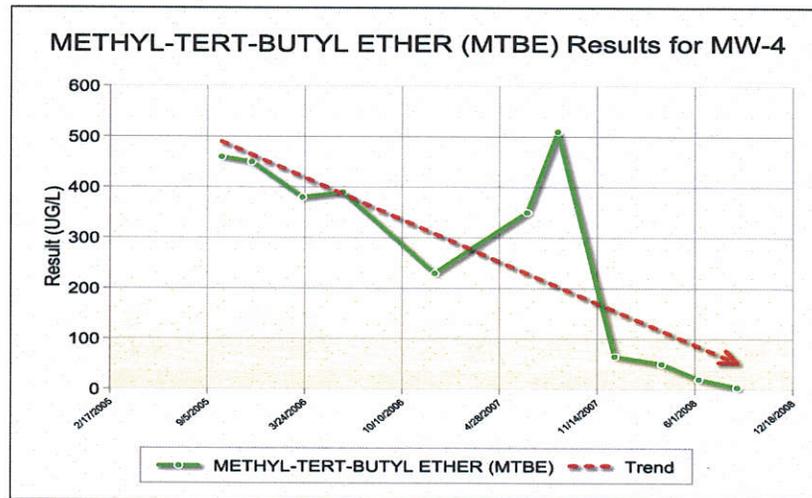
Source Area



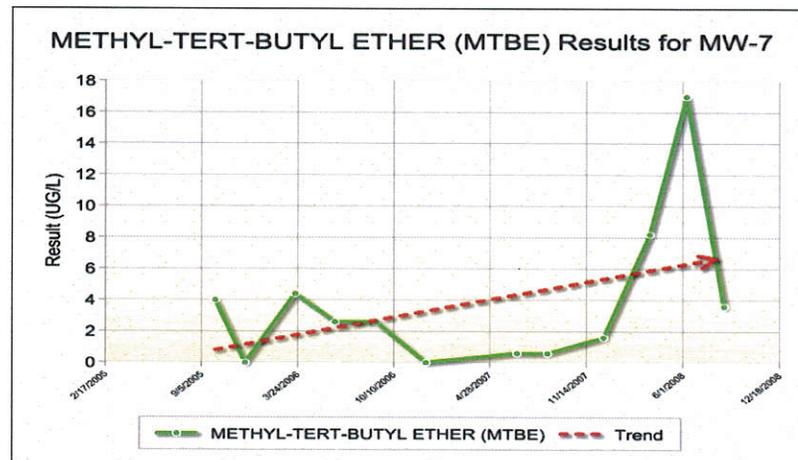
Source Area



Near Downgradient Area

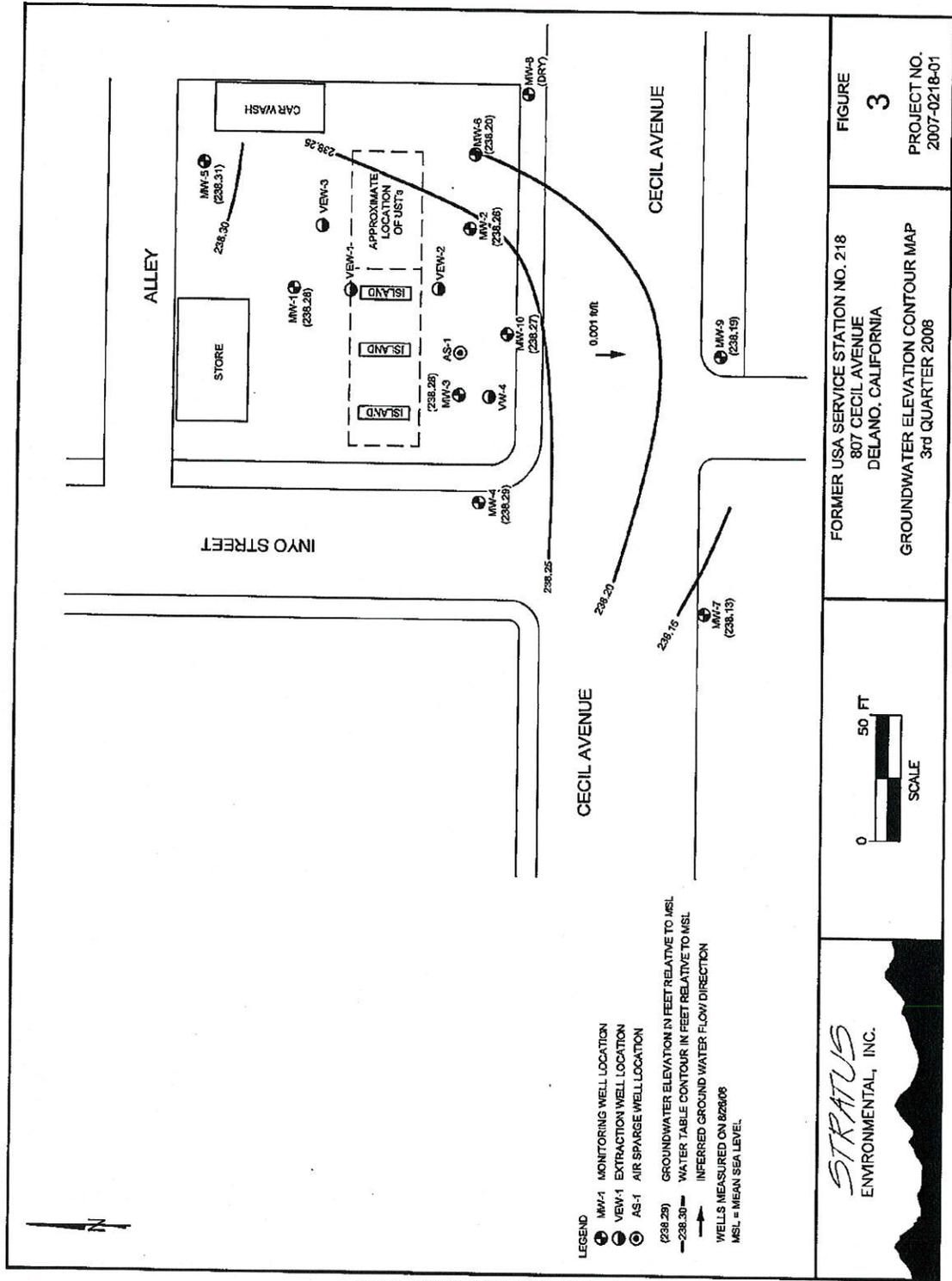


Far Downgradient Area



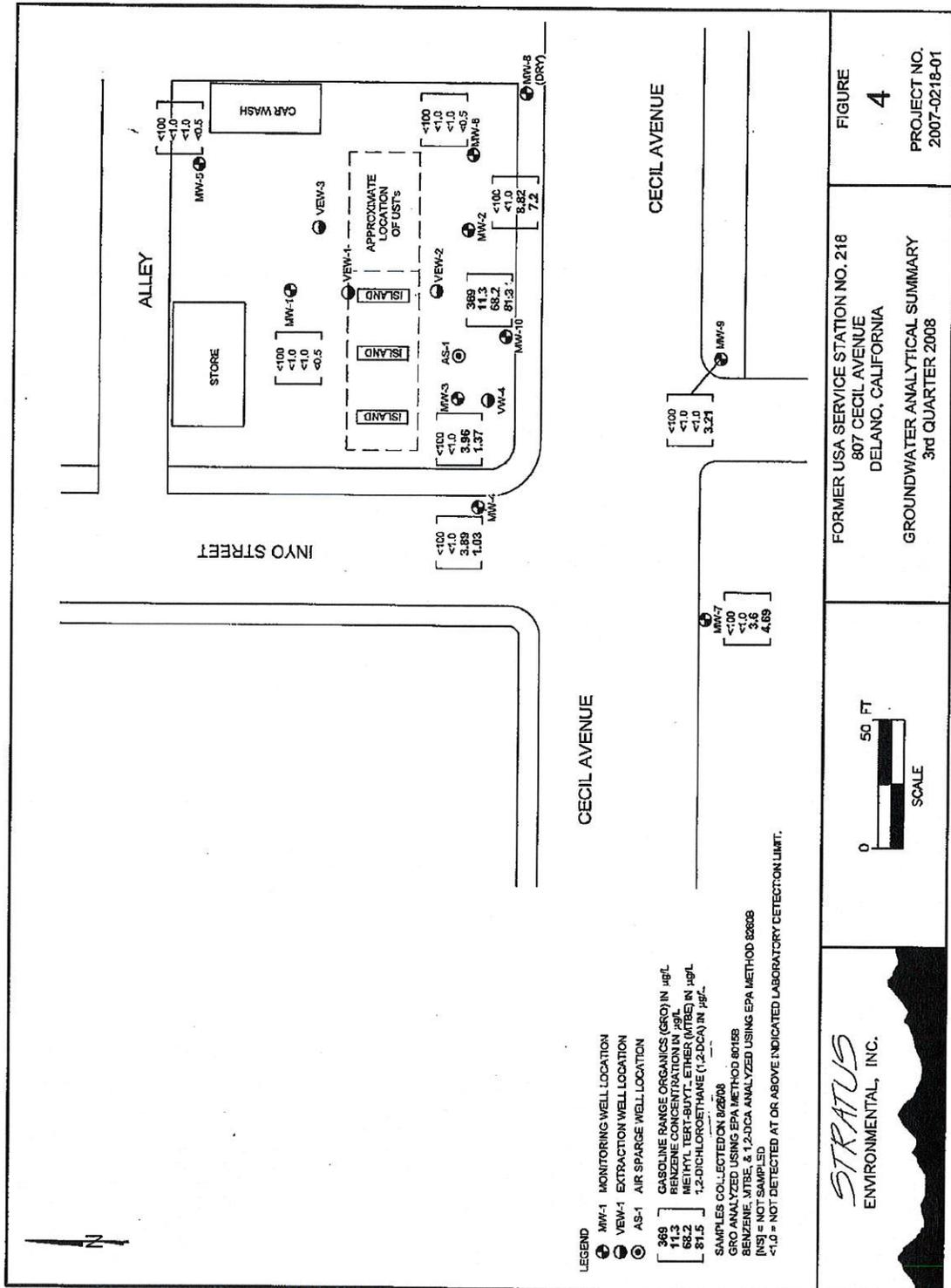
Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/ Groundwater tested for MTBE: Yes.
- Oxygen Concentrations in Soil Vapor: None reported.
- Plume Length: <100 feet.
- Plume Stable or Decreasing: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: 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.



F:\Jobs\Stratus Environmental\USA 218\USA 218 Site Plan Q3.dwg [w] 9/17/08 3:33pm brolialie XREFS:

	<p>FORMER USA SERVICE STATION NO. 218 807 CECIL AVENUE DELANO, CALIFORNIA</p>	<p>GROUNDWATER ELEVATION CONTOUR MAP 3rd QUARTER 2008</p>	<p>FIGURE 3 PROJECT NO. 2007-021B-01</p>
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F:\Jobs\Stratus Environmental\USA 218\USA 218 Site Plan 03.dwg [ANALYTICAL] 9/17/08 3:33pm brekhalle XREFS: