STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2013-0077-UST

In the Matter of Underground Storage Tank Case Closure

Pursuant to Health and Safety Code Section 25299.39.2 and the Low Threat Underground Storage Tank Case Closure Policy

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BY THE EXECUTIVE DIRECTOR[1]:

Pursuant to Health and Safety Code section 25299.39.2, the Manager of the Underground Storage Tank Cleanup Fund (Fund) recommends closure of the underground storage tank (UST) case at the site listed below.[2] The name of the Fund claimant, the Fund claim number, the site name and the applicable site address are as follows:

Jason Warner
Claim No. 8694
Oro Loma Sanitary District
2600 Grant Avenue, San Lorenzo
Alameda County Environmental Health Department

I. STATUTORY AND PROCEDURAL BACKGROUND

Section 25299.39.2 directs the Fund manager to review the case history of claims that have been active for five years or more (five-year review), unless there is an objection from the UST owner or operator. This section further authorizes the Fund Manager to make recommendations to the State Water Resources Control Board (State Water Board) for closure of a five-year-review case if the UST owner or operator approves. In response to a recommendation by the Fund Manager, 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:

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[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.

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.

The Fund Manager has completed a five-year 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 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 closure letter or a Letter of Commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied. A Letter of Commitment has already been issued on the claim subject to this order and the respective Fund claimant, so the 365-day timeframe for the submittal of claims for corrective action costs will start upon the issuance of the closure letter.

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. 8694
Oro Loma Sanitary District

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 water quality control policies and applicable water quality control plans.

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.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Water 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 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 closure letter, the Fund claimant is ordered to:

1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;

2. 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

3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in Section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.

B. The tasks in subparagraphs (1) and (2) 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 subparagraphs (1) and (2) of paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case 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. As specified in Health and Safety Code section 25299.39.2, subdivision (a) (2), corrective action costs incurred after a recommendation of closure shall be limited to $10,000 per year unless the Board or its delegated representative agrees that corrective action in excess of that amount is necessary to meet closure requirements, or additional corrective actions are necessary pursuant to section 25296.10, subdivisions (a) and (b). 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 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 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.

Thomas Howard

Executive Director

8/28/13

Date

State Water Resources Control Board

CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Alameda County Environmental Health Department (County)	Address: 1131 Harbor Bay Parkway, Alameda, CA 94501-6577
Agency Caseworker: Mark Detterman	Case No.: RO0000288

Case Information

USTCF Claim No.: 8694	Global ID: T0600101928
Site Name: Oro Loma Sanitary District	Site Address: 2600 Grant Avenue, San Lorenzo, CA 94580
Responsible Party: Jason Warner	Address: 2600 Grant Avenue, San Lorenzo, CA 94580
USTCF Expenditures to Date: $631,133	Number of Years Case Open: 20

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600101928

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 Low-Threat Policy. This case meets all of the required criteria of the Policy. A summary evaluation of compliance with the Policy is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Case Information.** Highlights of the Conceptual Site Model of the case follow:

The Site is an operating Publicly Owned Treatment Works (Waste Water Treatment Plant) that is operated adjacent to the San Francisco Bay and has a substantial buffer zone around it. The area of the former USTs beneath an employee parking lot that is covered by asphalt. An unauthorized release was reported in November 1992 followed by the removal of two gasoline USTs in 1995. A groundwater extraction and treatment system was tested but proved ineffective due to low groundwater flow. Since 1992, six monitoring wells have been installed and contaminated soil excavated. According to groundwater data, water quality objectives have been achieved for all constituents except total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, and methyl tert-butyl ether (MTBE) in three wells. When any residual petroleum hydrocarbons in groundwater migrate as far as the main plant interceptor; that groundwater will be captured and processed through the on-site treatment works.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no supply wells regulated by the California Department of Public Health or surface water bodies within 1,000 feet of the defined plume boundary. No other water supply wells have been identified within 1,000 feet of the defined plume boundary in files reviewed. Water is provided to water users near the Site by the City of Alameda Water District.

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, stable and concentrations 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 5. The nearest water supply well is greater than 1,000 feet from the defined plume boundary. The nearest surface water body is is approximately 500 feet from the defined plume boundary. The regulatory agency determines, based on an analysis of site specific conditions, which under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable time frame. During the UST removal activities the excavation (40 feet by 45 feet by 8 feet deep) was open for several weeks, and less than 100 gallons of groundwater were collected in the excavation. Based on this evidence the proposed and partially constructed groundwater extraction system was never started. This provides significant evidence the soil beneath the Site (Bay Mud) has minimal effective porosity to transmit water and soil vapor. Contamination left in place will stay in place and naturally degrade over time.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2b. A professional assessment of site-specific risk from exposure through the vapor intrusion pathway shows that maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. The area where the former USTs were located is now an asphalt parking lot.
- 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 directly substituted 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

The County objects to UST case closure for this case because:

- Insufficient soil sampling has been conducted to adequately assess contamination.
  RESPONSE: Soil sampling has been completed to assess the Site where possible. It is suspected that an unknown volume of affected soil underlies the facility. It is highly unlikely that the land use will change or the operation move to a different location.

- No conceptual site model has been completed.
  RESPONSE: There is enough information contained in multiple reports submitted to the regulatory agency over a period of time that support a conceptual site model that meets the Policy criteria.
- High concentratons of benzene remain in soil (12 mg/kg).
  RESPONSE: The concentrations of petroleum hydrocarbons that remain in the soil meet Table 1 of the Policy. Table 1 presents concentrations of petroleum constituents in Soil that will have no significant risk of adversely affecting human health.

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.

Fund Manager Recommendation for Closure
Based on available information, residual petroleum hydrocarbons at the Site do not pose significant risks 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. Alameda County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock 6/5/13

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

Prepared by: Pat G. Cullen P.G.

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]

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 case 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.	☒ Yes ☐ No
Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this site?	☐ Yes ☒ No
If so, was the corrective action performed consistent with any order?	☐ Yes ☐ No ☒ NA
<u>**General Criteria**</u> General criteria that must be satisfied by all candidate sites:	
Is the unauthorized release located within the service area of a public water system?	☒ Yes ☐ No
Does the unauthorized release consist only of petroleum?	☒ Yes ☐ No
Has the unauthorized ("primary") release from the UST system been stopped?	☒ Yes ☐ No
Has free product been removed to the maximum extent practicable?	☐ Yes ☐ No ☒ NA
Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?	☒ Yes ☐ No

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

Has secondary source been removed to the extent practicable?	☒ Yes ☐ No
Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?	☒ Yes ☐ No
Nuisance as defined by Water Code section 13050 does not exist at the site?	☒ Yes ☐ No
Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?	☐ Yes ☒ No
<u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria: **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:	
Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?	☒ Yes ☐ No ☐ NA
Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?	☒ Yes ☐ No ☐ NA
If YES, check applicable class: ☐ **1** ☐ **2** ☐ **3** ☐ **4** ☒ **5** **Do site soils contain insufficient mobile constituents (leachate, vapors, or light non-aqueous phase liquids) to threaten groundwater?**	☐ Yes ☐ No ☒ NA
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.	
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.	☐ Yes ☒ No
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: ☐ **1** ☐ **2** ☐ **3** ☐ **4**	☐Yes ☐ No ☒ NA

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?	☒ Yes ☐ No ☐ NA
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?	☐ Yes ☐ No ☒ NA
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).	
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)?	☒ Yes ☐ No ☐ NA
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?	☐ Yes ☐ No ☒ NA
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?	☐ Yes ☐ No ☒ NA

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

Site Location/ History

- The Site is located at the west end of Grant Avenue in San Lorenzo. The Site is an operating Publicly Owned Treatment Works (Waste Water Treatment Plant) that is operated adjacent to the San Francisco Bay and has a substantial buffer zone around it.
- The Site is bounded by San Francisco Bay to the west, open land to the north, three commercial warehouse structures the east, and open land to the south. Another UST site is located in the warehouse complex to the east.
- Since 1999, six monitoring wells have been installed and five are actively monitored.
- A Site map showing the location monitoring wells and site features is provided at the end of this closure review summary.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system
- Date reported: 11/2/1992.
- Status of Release: USTs removed.
- Free-Phase Hydrocarbons: None reported.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	?	Gasoline	Removed	May 1995
2	1,000	Gasoline	Removed	May 1995

Receptors

- GW Basin: Santa Clara Valley - East Bay Plain.
- Beneficial Uses: Municipal and Domestic Supply.
- Land Use Designation: Commercial/Industrial.
- Public Water System: East Bay Municipal Utility District.
- 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 1,000 feet of the defined plume boundary. No other water supply wells were identified within 1,000 feet of the defined plume boundary in the files reviewed.
- Distance to Nearest Surface Water: The San Francisco Bay wetlands lies 500 feet northwest of the Site.

Geology/ Hydrogeology

- Stratigraphy: The Site is underlain by clays interbedded with fine sands, silts and occasional peat.
- Maximum Sample Depth: 51 feet below ground surface (bgs).
- Minimum Groundwater Depth: 2.08 bgs at monitoring well MW-D-1.
- Maximum Groundwater Depth: 8.73 feet bgs at monitoring well MW-1.
- Current Average Depth to Groundwater: Approximately 7 feet bgs.
- Saturated Zones(s) Studied: Approximately 2 - 15 bgs.
- Appropriate Screen Interval: Yes.

- Groundwater Flow Direction: Generally southerly towards the main interceptor that delivers all wastewater to the plant. If groundwater were to reach the trench of the main interceptor, it would be captured and treated as part of the POTW.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (12/27/2010)
MW1	1999	5-15	6.21
MW2	1999	5-15	5.01
MW3	1999	5-15	4.51
MW4	2002	4-14	Abandoned 2008
MW5	2002	4-14	3.85
MW6	2002	3-13	3.89

Remedial Action

- Free Product: None reported.
- Soil Excavation: In 2008, approximately 574 tons of impacted soil were removed and disposed. The limits of the excavation were 40-foot by 45-foot by 8-foot deep. Less than 100 gallons of formation water entered the open excavation over a two week period.
- In-Situ Soil Remediation: None reported.
- Groundwater Remediation: Groundwater extraction system was installed but never utilized due to tight soil conditions identified during the tank removal.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs (mg/kg [Date])	Maximum 5-10 feet bgs (mg/kg [Date])
Benzene	<0.005 @ 4 feet (4/16/2008)	12 @ 7 feet (4/16/2008)
Ethylbenzene	0.01 @4 feet (4/16/2008)	60 @ 7 feet (4/16/2008)
Naphthalene	NA	NA
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
NA: Not Analyzed

Oro Loma Sanitation District
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Most Recent Concentrations of Petroleum Constituents in Groundwater

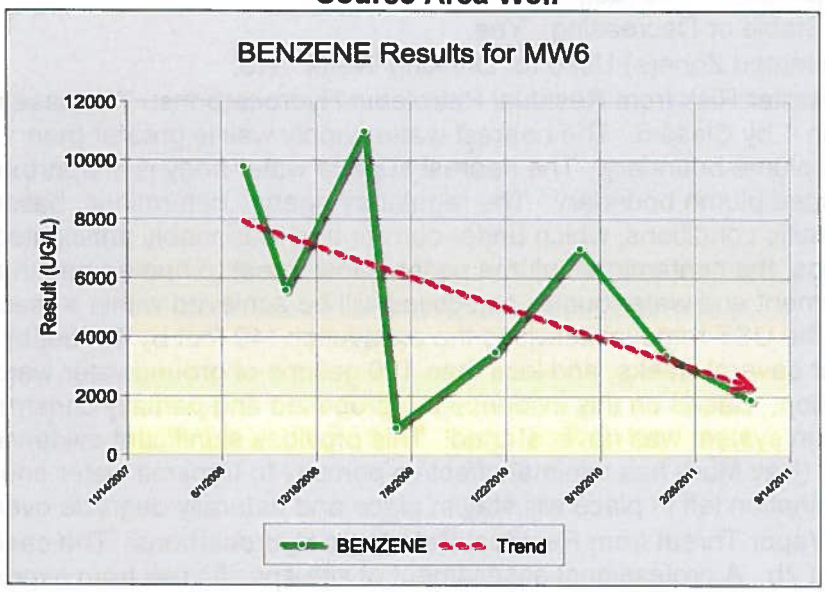
Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)
MW1	06/29/11	<50	<0.5	<0.5	<0.5	<1.0	<0.5
MW2	06/29/11	<50	<0.5	<0.5	<0.5	<1.0	0.76
MW3	06/29/11	<50	<0.5	<0.5	<0.5	<1.0	**26**
MW4	NS	NS	NS	NS	NS	NS	NS
MW5	06/29/11	**6,000**	**2,500**	**76**	220	720	**8**
MW6	06/29/11	**6,000**	**1,900**	**150**	30	940	**32**
RW1	06/29/11	<50	<0.5	<0.5	<0.5	<1.0	<0.5
WQOs	-	--	**1**	**150**	**700**	**1,750**	**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
WQOs: Water Quality Objectives, Regional Water Board Basin Plan
--: Regional Water Board Basin Plan does not have a numeric water quality objective for TPHg

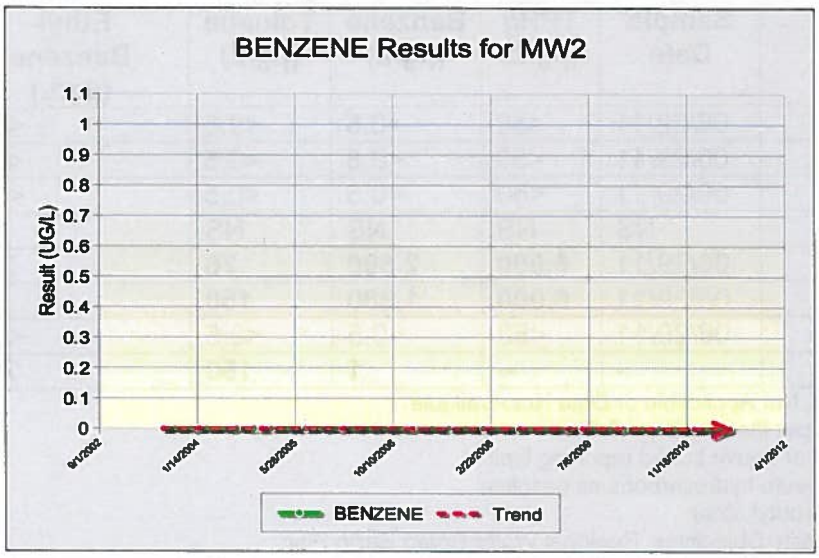
Groundwater Trends:

- There are nine years of groundwater monitoring data for this Site. Benzene trends are shown below: Source Area (MW6) and Downgradient (MW2).

Source Area Well



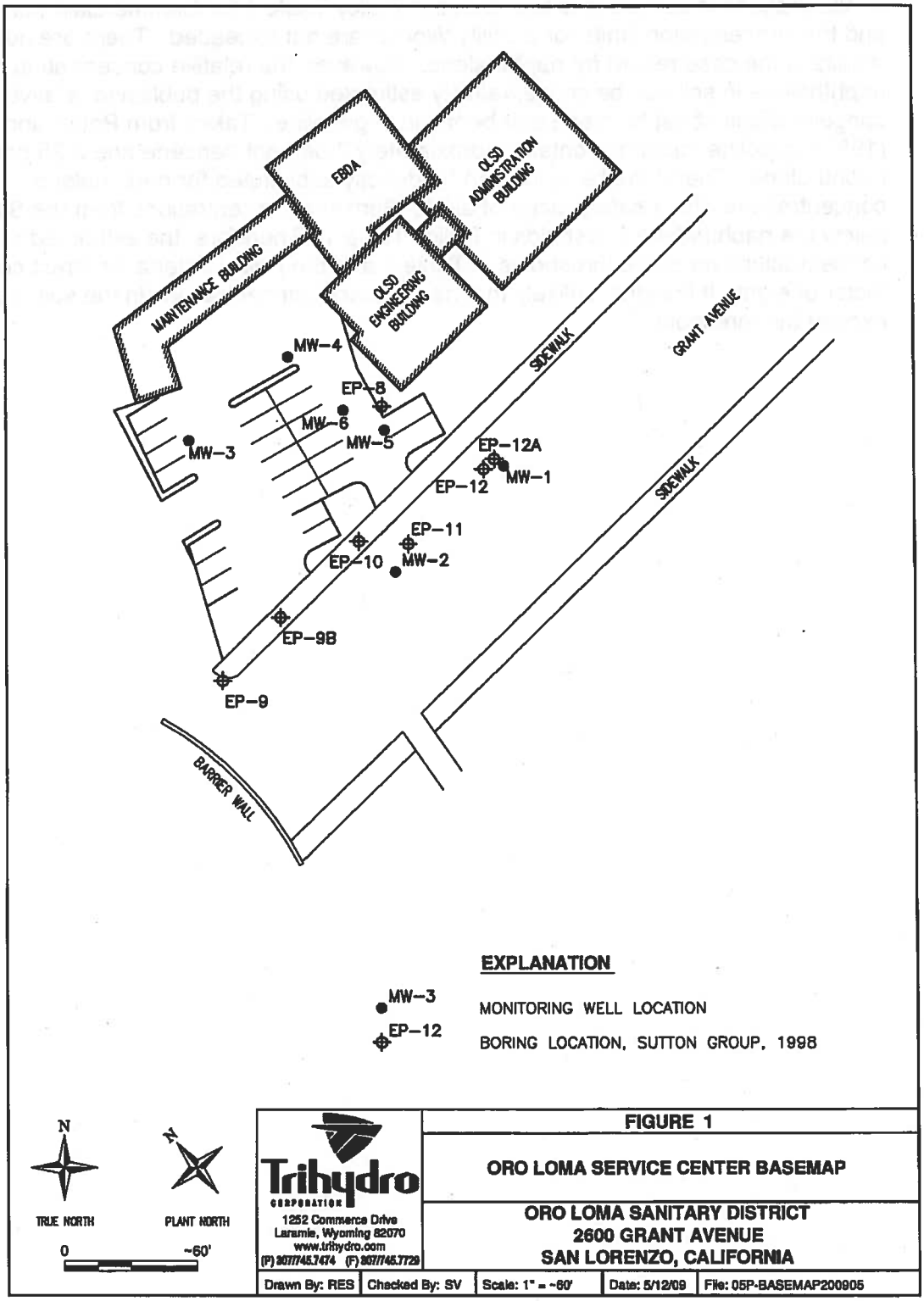
Downgradient (50 feet) well



Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for MTBE: Yes, see table above.
- 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 5. The nearest water supply well is greater than 1,000 feet from the defined plume boundary. The nearest surface water body is is approximately 500 feet from the defined plume boundary. The regulatory agency determines, based on an analysis of site specific conditions, which under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable time frame. During the UST removal activities the excavation (40 feet by 45 feet by 8 feet deep) was open for several weeks, and less than 100 gallons of groundwater were collected in the excavation. Based on this evidence the proposed and partially constructed groundwater extraction system was never started. This provides significant evidence the soil beneath the Site (Bay Mud) has minimal effective porosity to transmit water and soil vapor. Contamination left in place will stay in place and naturally degrade over time.
- Indoor Vapor Threat from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 2b. A professional assessment of site-specific risk from exposure through the vapor intrusion pathway shows that maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. The area where the former USTs were located is now an asphalt parking lot.

- 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 directly substituted 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.

2600 Grant Avenue, San Lorenzo June 2013

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