



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 (Regional Water Board)	Address: 11020 Sun Center Drive, #200, Rancho Cordova, CA 95670
Agency Caseworker: Peter Minkel	Case No.: 550155

Case Information

USTCF Claim No.: 16784	GeoTracker Global ID: T0610991409
Site Name: Speaker's Garage	Site Address: 18699 Pine Street, Tuolumne, CA 95379
Responsible Party: Speaker's Garage, Inc., Assignee, Attn: Howard Jack Smith	Address: (Private Residence)
USTCF Expenditures to Date: \$521,502	Number of Years Case Open: 12

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0610991409

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. 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 (Conceptual Site Model)**. Highlights of the case follow:

This case is a former commercial petroleum fueling facility and is currently a vacant lot. An unauthorized release was reported in May 2001 following the removal of three gasoline USTs. Approximately 2,100 cubic yards of impacted soil were excavated, disposed offsite in 2001, and backfilled with clean imported fill. Batch dual phase extraction was conducted between November 2005 and June 2009, which reportedly removed 3,090 gallons of contaminated groundwater. Since 2002, five groundwater monitoring wells were installed and monitored regularly. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except total petroleum hydrocarbons as gasoline (TPHg), benzene, and 1,2 dichloroethane (1,2 DCA) in offsite monitoring well MW-4.

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. Reportedly, two domestic wells are 500 feet and 600 feet south (crossgradient) and southeast (upgradient) of the Site, respectively. No other water supply wells were identified within 1,000 feet of the defined plume boundary in the files reviewed. Water is provided to water users near the Site by the Tuolumne Utilities District. The affected groundwater is not currently being used as a source of drinking

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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 Risk from Residual Petroleum Hydrocarbons:** The case meets Policy Criterion 1 by Class 5. The Site would have met Class 2 had it not been for two domestic wells. The two domestic supply wells are located approximately 500 and 600 feet crossgradient and upgradient, respectively, from the Site. The nearest surface water body is greater than 1,000 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. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The dissolved concentrations of benzene and MTBE are each less than 1,000 µg/L.
- **Vapor Intrusion to Indoor Air:** The case meets Policy Criterion 2a by Scenario 3a. The maximum benzene concentration in groundwater is less than 100 µg/L. The minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 mg/kg of TPH.
- **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 and Responses

By April 5, 2013 personal communications (email), the Regional Water Board objects to UST case closure because:

- There is an increasing benzene concentration in MW-4.
RESPONSE: The extent of groundwater contamination is defined. Concentrations in well MW-4, post-remediation, have stabilized. The case meets Policy Criterion 1 by Class 5.
- Indoor vapor migration risk not adequately assessed.
RESPONSE: The case meets Policy Criterion 2a by Scenario 3a. Onsite affected soil was removed by excavation and replaced with clean imported soil. Properties downgradient of

the source area have more than 5 feet of unaffected soil between groundwater and their foundation. In addition, benzene concentrations are less than 1,000 (µg/L).

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

Lisa Babcock

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

9/22/13

Date

Prepared by: Kirk Larson, 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

<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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" 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?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>

<p>If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4</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

- This Site is a vacant lot and is bounded by businesses across Pine Street to the west, residences across Chestnut Street to the north, a residence to the east, and a business to the south.
- Site map showing the location of the former USTs, monitoring wells, and benzene concentrations are provided at the end of this closure review summary (Condor, 2012).
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: May 2001.
- Status of Release: USTs removed.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/Removed/Active	Date
1	1,000	Gasoline	Removed	April 2001
2	500	Gasoline	Removed	April 2001
3	?	Gasoline	Removed	April 2001

Receptors

- GW Basin: Unnamed basin.
- Watershed: Tuolumne River – Big Oak Flat – Sonora.
- Beneficial Groundwater Uses: Regional Water Board Basin Plan lists agricultural, freshwater replenishment, industrial process and service supply, groundwater recharge, municipal and domestic supply.
- Land Use Designation: Aerial photograph available on GeoTracker indicates land use is mixed residential and commercial in the vicinity of the Site.
- Public Water System: Tuolumne Utilities 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. Reportedly, two domestic wells are 500 feet and 600 feet south (crossgradient) and southeast (upgradient), respectively. 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: There is no identified surface water within 1,000 feet of the defined plume boundary.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by interbedded and intermixed sand, silt, and clay.
- Maximum Sample Depth: 29 feet below ground surface (bgs).
- Minimum Groundwater Depth: 5.11 feet bgs at monitoring well MW-3.
- Maximum Groundwater Depth: 14.41 feet bgs at monitoring well MW-4.
- Current Average Depth to Groundwater: Approximately 13 feet bgs.
- Saturated Zones(s) Studied: Approximately 5 - 29 feet bgs.
- Groundwater Flow Direction: Westerly.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (10/24/12)
MW-1	November 2002	12-23	12.68
MW-2	November 2002	19-29	13.62
MW-3	November 2002	12-23	12.41
MW-4	March 2003	10-25	13.87
MW-5	October 2006	5-20	13.86

Remediation Summary

- Free Product: None reported in GeoTracker.
- Soil Excavation: Approximately 2,100 cubic yards of impacted soil were excavated, disposed offsite in 2001, and replaced with clean fill.
- In-Situ Soil/Groundwater Remediation: Batch dual phase extraction was conducted between November 2005 and June 2009, which reportedly removed approximately 3,090 gallons of contaminated groundwater.

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	0.3 (11/05/07)	<0.5 (11/05/07)
Ethylbenzene	1.3 (11/05/07)	0.4 (11/05/07)
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

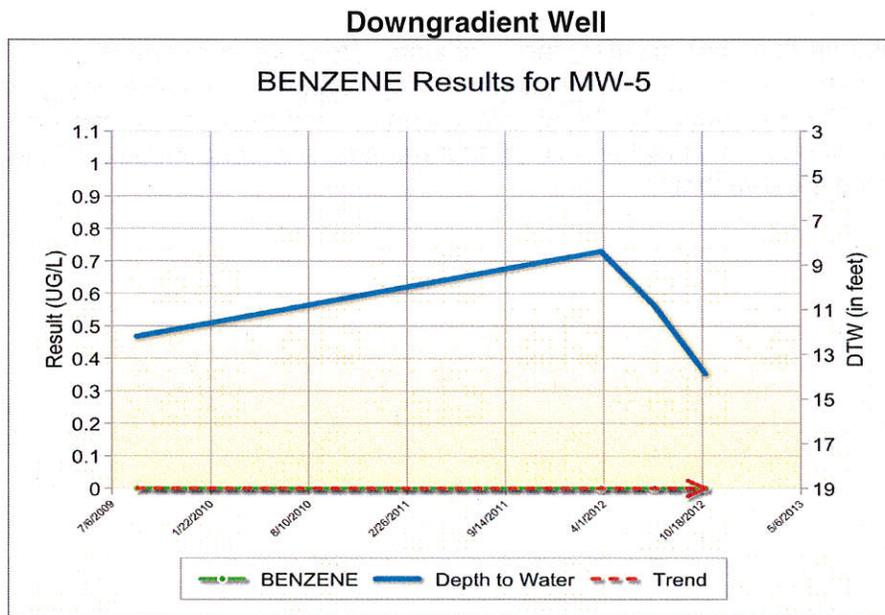
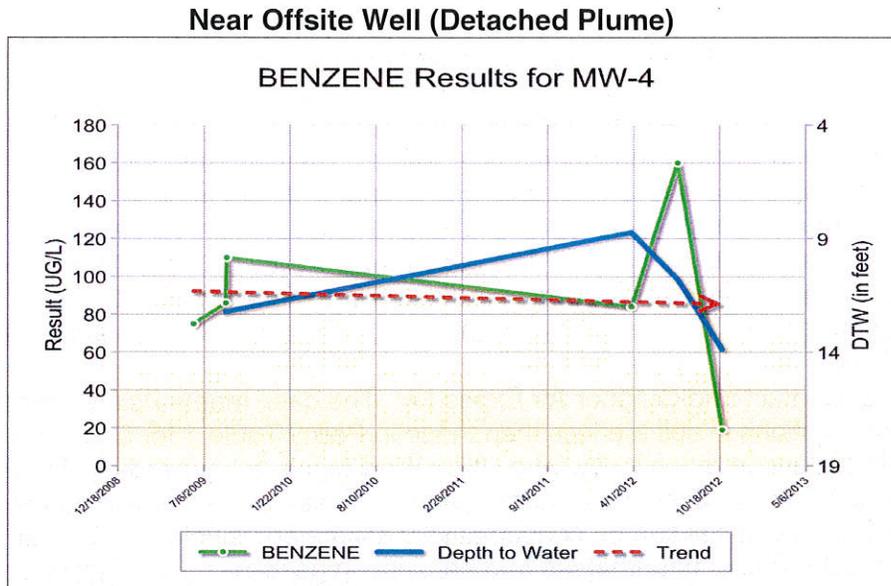
Most Recent Concentrations of Petroleum Constituents in Groundwater

Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	1,2 DCA (µg/L)
MW-1	10/24/12	<50	<0.5	<0.5	<0.5	<1	<0.5	<0.5
MW-2	10/24/12	<50	<0.5	<0.5	<0.5	<1	<0.5	<0.5
MW-3	10/24/12	<50	<0.5	<0.5	<0.5	<1	<0.5	<0.5
MW-4	10/24/12	220	19	2.6	1.2	2.9	<0.5	12
MW-5	10/24/12	<50	<0.5	<0.5	<0.5	<1	<0.5	<0.5
WQOs	-	5	0.15	42	29	17	5	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
 WQOs: Water Quality Objectives, Regional Water Board Basin Plan

Groundwater Trends

- There are 10 years of regular groundwater monitoring data for this case. Benzene and depth to groundwater trends are shown below.



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: <120 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 Site would have met Class 2 had it not been for two domestic wells. The two domestic supply wells are located approximately 500 and 600 feet crossgradient and upgradient, respectively, from the Site. The nearest surface water body is greater than 1,000 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. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The dissolved concentrations of benzene and MTBE are each less than 1,000 µg/L.
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