

**State Water Resources Control Board**

**UST CASE CLOSURE REVIEW SUMMARY REPORT**

**Agency Information**

Agency Name: Orange County Environmental Health Department (County)	Address: 1241 East Dyer Road, Suite 120 Santa Ana, CA 92705
Agency Caseworker: Julie Wozencraft	Case No.: 98UT056

**Case Information**

USTCF Claim No.: 14283	GeoTracker Global ID: T0605902212
Site Name: Yorba Country Car Wash	Site Address: 17581 Yorba Linda Yorba Linda, CA 92886
Responsible Party: Yorba Country Car Wash Attn: Marie Bidondo	Address: 17581 Yorba Linda Yorba Linda, CA 92886
USTCF Expenditures to Date: \$1,495,000	Number of Years Case Open: 16

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=T0605902212](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0605902212)

**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 case is a former commercial petroleum fueling facility and currently a car wash. An unauthorized release was reported in August 1998 following the removal and replacement of three gasoline USTs. Approximately 665 tons of soil was excavated and transported offsite. In August 2003, three gasoline USTs were removed. Dual phase extraction was conducted between March 2001 and August 2005, which removed 2.6 million gallons of contaminated groundwater including an estimated 13,163 pounds of total petroleum hydrocarbons as gasoline (TPHg). Active remediation has not been conducted for the past nine years. Since 1999, 28 groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved except methyl tertiary-butyl ether (MTBE).

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells 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. A concrete lined storm drainage canal is located approximately 400 feet west and crossgradient from the defined plume boundary. 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 the affected shallow 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 5. A concrete lined storm drainage canal is located approximately 400 feet west and crossgradient from the defined plume boundary. There is no hydraulic connection between the defined plume boundary and the canal because the groundwater depth is approximately 25 feet below ground surface (bgs). The plume does not pose a significant risk to the canal. Otherwise, the case meets Policy Criterion 1 by Class 4. The contaminant plume that exceeds water quality objectives is less than 1,000 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 defined plume boundary. The dissolved concentrations of benzene and MTBE are each less than 1,000 micrograms per liter ( $\mu\text{g/L}$ ).
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The onsite building is a car wash facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building. In addition, as a car wash there would adequate air exchange provided by the building's ventilation system required to control vehicle exhaust generated during car wash activities.
- Direct Contact and Outdoor Air Exposure: This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from potential exposure to residual soil contamination was completed by Fund staff. The results of the assessment found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. Approximately 665 tons of soil was excavated and transported offsite in 2003 following the removal of three gasoline USTs. The Site is paved and accidental exposure to site soils is prevented. Therefore, the pathway is incomplete. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.

Yorba Country Car Wash  
17581 Yorba Linda, Yorba Linda  
Claim No: 14283

**Determination**

The Fund Manager has determined that corrective action performed at the Site is consistent with the requirements of Health and Safety code section 25296.10, subdivision (a), and 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 staff is conducting public notification as required by the Policy. Orange County has the regulatory responsibility to supervise the abandonment of monitoring wells.

*Lisa Babcock*

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

*7/6/15*

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Date

Prepared by: Kirk Larson, P.G.

**Objections to Closure and Response**  
**Regarding Yorba Country Car Wash, 17581 Yorba Linda Blvd., Yorba Linda**  
**Claim #14283**

The Draft Review Summary Report was emailed to Orange County Health Care Agency (County) on April 28, 2015 with a request for a teleconference to discuss closure of the site. In an email dated May 8, 2015, the County staff stated that they would not close the case, but would not object to the State Water Board staff closing the site as long as the County's objections, as presented on the Low Threat Closure Checklist dated May 4, 2015, were made public. The objections are presented below:

- Comment 1: Inadequate conceptual site model. The groundwater plume is not defined.  
Response 1: Adequate data are available in GeoTracker to develop a conceptual site model as defined by the Policy. Downgradient offsite groundwater monitoring well MW-21S has been monitored since 2009 and has indicated primarily nondetectable petroleum hydrocarbon concentrations.
- Comment 2: Secondary source was not removed to the extent practicable. Remediation was designed and implemented incorrectly.  
Response 2: Secondary source removal activities include excavation of 665 tons of contaminated soil and active remediation. Dual phase extraction conducted between March 2001 and August 2005, removed 2.6 million gallons of contaminated groundwater including an estimated 13,163 pounds of total petroleum hydrocarbons as gasoline (TPHg). The volume of recovered petroleum hydrocarbons combined with a dissolved constituent plume that is stable and decreasing in areal extent indicate that the remediation method was effective in removing secondary source.
- Comment 3: The site does not meet any of the Groundwater specific criteria scenarios.  
Response 3: Although a concrete lined storm drainage canal is located approximately 400 feet west and crossgradient from the defined plume boundary, there is no hydraulic connection between the canal and groundwater beneath the Site. Due to the presence of the canal within 1,000 feet of the defined plume boundary, the case meets Policy Criterion 1 by Class 5. If not for the canal, the case meets Policy Criterion 1 by Class 4. The contaminant plume that exceeds water quality objectives is less than 1,000 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 defined plume boundary. The dissolved concentrations of benzene and MTBE are each less than 1,000 micrograms per liter ( $\mu\text{g/L}$ ).
- Comment 4: The case does not meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios. No soil gas samples have been collected.  
Response 4: The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The onsite building is a car wash facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building. In addition, as a car wash there would adequate air exchange provided by the building's ventilation system required to control vehicle exhaust generated during car wash activities.

- Comment 5: The case does not meet any of the Direct Contact and outdoor Air Exposure criteria scenarios.  
Response 5: The case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from potential exposure to residual soil contamination was completed by Fund staff. The results of the assessment found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. Approximately 665 tons of soil was excavated and transported offsite in 2003 following the removal of three gasoline USTs. The Site is paved and accidental exposure to site soils is prevented. Therefore, the pathway is incomplete. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.