

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.: 04UT027

Case Information

USTCF Claim No.: 18714	GeoTracker Global ID: T0605903017
Site Name: Sunset Property Services	Site Address: 16251 Construction Circle West, Irvine, CA 92606
Responsible Party: Sunset Property Services Attn: Tracy Gould	Address: 16251 Construction Circle West Irvine, CA 92606
USTCF Expenditures to Date: \$128,023	Number of Years Case Open: 10

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=T0605903017

Summary

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

This Site is a former commercial petroleum fueling facility currently developed as a multi-use commercial property. An unauthorized release was reported in November 2004 following the removal of one gasoline UST. No additional active remediation has been conducted. Since 2006, seven groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except methyl tert-butyl ether (MTBE) in MW-5.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 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. 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 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 Policy Criterion 2a by Scenario 3a. The maximum benzene concentration in groundwater is less than 100 micrograms per liter ($\mu\text{g/L}$). The minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 milligrams per kilogram (mg/kg) of TPH.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

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

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

7/6/15
Date

Prepared by: Kirk Larson, P.G.

**Objections to Closure and Responses for
Sunset Property Services Located at 16251 Construction Circle, Irvine
Claim 18714**

The Review Summary Report recommending closure was emailed to the Orange County Health Care Agency (County) on May 18, 2015, with a request for comments or a teleconference. The email requested a response by June 2, 2015. On May 28, 2015, the County requested a copy of the Objections to Closure and Response for review (included below), which State Water Board emailed to the County on May 29, 2015. No further communication or a request for teleconference was received by June 2, 2015. State Water Board staff determined that the lack of response indicated the County had no objections to closure.

According to the closure denial letter dated, October 24, 2014, the County objected to UST case closure for the following reasons:

Comment 1: The case does not meet Policy groundwater criteria because total petroleum hydrocarbons as gasoline (TPHg) and tert-butyl alcohol (TBA) concentrations increased since 2012.

Response 1: There are no water quality objectives for either TPHg or TBA. Minor fluctuations in source area wells MW2 and MW3 are not indicative of an unstable or mobile groundwater plume. The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives (WQOs) 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.

Comment 2: Secondary source removal has not been completed at the Site. The 2005 tank removal report states that the excavated material was used as backfill.

Response 2: The Policy requires secondary source removal and/or active remediation only if these actions are warranted. The historical and current groundwater data for the Site indicate that no significant source remains and that natural attenuation has, and will continue to reduce residual concentrations to below the WQO.