

State Water Resources Control Board

REVIEW SUMMARY REPORT – CONCUR
THIRD REVIEW – AUGUST 2016

Agency Information

Agency Name: San Diego County Department of Environmental Health (County)	Address: P.O. Box 129261 San Diego, CA 92112-9261
Agency Caseworker: Laurie Apecechea	Case No.: H13477-001

Case Information

USTCF Claim No.: 14693	GeoTracker Global ID: T0607302693
Site Name: Epoch Corp-Linda Vista#166	Site Address: 7611 Linda Vista Road San Diego, CA 92111
Responsible Party#1: Gordon Frost G.T.F. Properties	Address #1: P.O. Box 919 Carson, CA 90810
Responsible Party#2: Henry Armor NACS	Address # 2: 1600 Duke Street Alexandria, VA 22314
USTCF Expenditures to Date: \$330,702	Number of Years Case Open: 17
Fund Budget Category: Currently designated as Remedy Selection/Interim Remedial Action -- RS/IRA	

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=T0607302693

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 an active commercial petroleum fueling facility with an auto repair shop and a convenience store. An unauthorized release was reported in June 1999 following the removal and replacement of four gasoline USTs. Approximately 1,535 cubic yards of impacted soil were removed and disposed offsite in 1999. In 2012, two Dual Phase Extraction (DPE) pilot tests were conducted at the Site removing approximately 10 pounds of hydrocarbons and 450 gallons of contaminated groundwater. Another DPE pilot test was conducted in 2015, removing approximately 5 pounds of hydrocarbons and 170 gallons of contaminated groundwater. Active remediation has not been conducted at the Site since 2015. Since 2000, eleven groundwater monitoring wells have been installed and regularly monitored. Water quality objectives are not

relevant for this case because the Site is located in a hydrologic basin which is not only exempted from municipal use designation but has no other designated beneficial uses.

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 1,000 feet of the Site. No other water supply wells have been identified within 1,000 feet of the Site 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 impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting.

Rationale for Closure under the Policy

- **General Criteria:** The case meets all eight Policy general criteria.
- **Groundwater Specific Criteria:** The criteria do not apply because the groundwater underlying the Site is exempt from municipal use designation under the terms and conditions of State Water Board Resolution No. 88-63, "Sources of Drinking Water Policy". Also, the groundwater is not designated for agricultural supply, industrial service supply, industrial process supply, freshwater replenishment and groundwater recharge. There are also no water supply wells or surface water bodies within 1,000 feet of the Site.
- **Vapor Intrusion to Indoor Air:** This active fueling facility meets the Active Commercial Petroleum Fueling Facility Exception. Exposure to petroleum vapors associated with historical fuel system releases is comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities. Additionally, the onsite building includes an active automotive repair facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building. Therefore, the pathway is incomplete. In addition, as an active automotive repair facility, there would adequate air exchange provided by the building's ventilation system required to control vehicle exhaust generated during automotive repair. The off-site properties associated with the case meet 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:** This case meets Policy Criterion 3b. A site-specific risk assessment of potential exposure to residual soil contamination [SECOR, 2004 and AEI, 2009] found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. Additionally, approximately 1,535 cubic yards of impacted soils have been excavated and disposed offsite. And, most of the documented impacted soils are at depths greater than 15 feet below ground surface (bgs). Moreover, the Site is paved and accidental exposure to site soils is prevented. 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

Epoch Corporation-Linda Vista#166
7611 Linda Vista Road, San Diego
Claim No: 14693

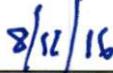
August 2016

building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.

Recommendation

According to a June 2, 2016 letter on GeoTracker, County staff has determined the Site to be a low-threat based upon a site specific analysis and has initiated steps to close the case. State Water Board staff concurs with the proposed closure of the case.

The recommended Fund budget category for this claim is:
SC – Site Closure

			
_____ Ramesh Sundareswaran Date Water Resource Control Engineer Technical Review Unit (916) 341-5670		_____ Pat G. Cullen Senior Engineering Geologist Chief, Technical Review Unit (916) 341-5684	_____ Date