



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

APR 23 2013

Geniece Higgins
Supervising Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health
Orange County Health Care Agency
1241 E. Dyer Road, Suite 120
Santa Ana, CA 92705

DRAFT UST CASE REVIEW SUMMARY REPORT-- ADDITIONAL WORK, THIRD 5-YEAR REVIEW FOR CLAIM NUMBER 12069; FORMER MERCURY RENTALS, 4664 LINCLON AVENUE, CYPRESS, CA 90630

The UST Cleanup Fund (Fund) has completed our review of Orange County Hazardous Materials Mitigation Section (Orange County) Case No. 95UT024. The Draft Review Summary Report for this case is enclosed for your information and comment. Please note that the Fund's recommendations are based on review of information contained in the Fund's case files, data currently in the GeoTracker database and any other sources of information that were readily available to Fund staff at the time the review was conducted. Consequently, they may not reflect historical information that has not been uploaded to the GeoTracker database or available in the Fund's case files and any data that has been recently submitted to your office.

The Fund requests that Orange County staff notify the Fund within 45 days from the date of this letter as to whether you agree or disagree with our recommendations for this case. If you agree with our recommendation, we request that you provide the Fund with an estimated timeframe to either implement the recommendations for additional corrective action or for closing this case. If you do not agree with our recommendations, we request that you provide the Fund with a summary of the reasons for disagreeing and/or impediments to implementing the recommendations for additional corrective action or closing this case. Responses to the Fund may be provided by e-mail, letter or a copy of correspondence to the RP, if the correspondence addresses all the information requested by the Fund. Please direct your response to:

Ramesh Sundareswaran
Underground Storage Tank Cleanup Fund
State Water Resources Control Board
P.O. Box 944212
Sacramento, CA 94244-2120



Fund staff will be sending copies of the completed Review Summary Report to applicable claimants 45 days from the date of this letter unless Orange County notifies the Fund that they wish to discuss this case prior to transmittal to the claimant. If you or your staff has any questions or concerns on specific reports that you would like to discuss with the Fund prior to transmittal of the report to the claimant, please contact Ramesh Sundareswaran at (916) 341-5670 or by email (RSundareswaran@waterboards.ca.gov) within this period.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Trommer".

Robert Trommer
Senior Engineering Geologist
Chief, Technical Review Unit
Underground Storage Tank Cleanup Fund

cc: Ms. Julie Wozencraft
Orange County Health Care Agency
Hazardous Materials Mitigation Section
1241 E. Dyer Road, Suite 120
Santa Ana, CA 92705

Mr. Ken Williams
Santa Ana RWQCB (Region 8)
3737 Main Street, Suite 500
Riverside, CA 92501-3339



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DRAFT

UST CASE REVIEW SUMMARY REPORT- ADDITIONAL WORK THIRD 5-YEAR REVIEW – APRIL 2013

Agency Information

Agency Name: Orange County Health Care Agency (County)	Address: 1241 East Dyer Road, Suite 120 Santa Ana, CA 92705
Agency Caseworker: Julie Wozencraft	Case No.: 95UT024

Case Information

USTCF Claim No.: 12069	GeoTracker Global ID: T0605901859
Site Name: Former Mercury Rentals, Inc.	Site Address: 4664 Lincoln Avenue Cypress, CA 90630
Responsible Party: Winton G. Kemmis Trust	Address: Private residence
USTCF Expenditures to Date: \$ 831,914	Number of Years Case Open: 18

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0605901859

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 does not meet 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)** and **Attachment 3: Previous Recommendations**. Highlights of the case follow:

This Site is occupied by a retail plaza along with a self-storage facility. An unauthorized leak was reported in March 1995 following the removal of five USTs (two gasoline and three diesel). Since then, the Site has undergone various site assessments, remedial actions to remove free product and a soil vapor survey. The remedial actions to remove free product include use of a French drain and vacuum pumping, hand bailing and both passive and active skimming. Free product continues to be persistent and needs to be removed to the maximum extent practicable. According to groundwater data, water quality objectives have been achieved or nearly achieved for all dissolved constituents except for benzene and methyl tert-butyl ether (MTBE).

The Site at this time does not satisfy all of the eight general criteria and the the media-specific criteria for groundwater of the Policy as presented in the synopsis below.

Rationale for Closure under the Policy

- **General Criteria:** The case meets only seven of the eight Policy general criteria. Free product is still persistent and needs to be removed to the maximum extent practicable in accordance with the Policy.
- **Groundwater Risk from Residual Petroleum Hydrocarbons:** The case does not meet the groundwater plume class criteria as free product is still persistent at the Site and its migration is still being abated.
- **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. Firstly, benzene which is the primary driver for vapor intrusion from groundwater is below its water quality objectives at the Site. Secondly, though elevated levels of benzene and ethylbenzene were reported in the recent soil gas survey, those concentrations were directly measured in locations outside of the building slab/foundation footprint. Consequently, those locations do not pose any vapor intrusion risks as they are not beneath the retail plaza or the self-storage building. Thirdly, the low permeable nature of the soils underlying the Site (i.e., clayey silt, silty sand and sandy silt) preclude the creation of any preferential pathways extending from those elevated soil gas locations to either the retail plaza or self-storage building.
- **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 land 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.

Recommendation

Based on available information, the Fund recommends that the County direct the Responsible Party conduct necessary remediation to recover the free product to the maximum extent practicable in a timely manner.



Ramesh Sundareswaran Date 4/18/13
Water Resource Control Engineer
Technical Review Unit
(916) 341-5670



Robert Trommer, C.H.G. Date 4/12/13
Chief
Technical Review Unit
(916) 341- 5684

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><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 <input type="checkbox"/> NA</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 a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p> <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 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 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input checked="" 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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>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: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input 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 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>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 case is located on the south side of Lincoln Avenue and presently contains a retail plaza and a self-storage facility. The retail plaza building is located in the northern portion of the Site while the storage building is in the southern portion.
- The Site is bounded by Lincoln Avenue to the north, a small restaurant, grocery store and residential housing to the east, a recreational vehicle storage lot to the south and an auto tow service facility to the west. Across Lincoln Avenue to the north is a mortuary and cemetery.
- A site map showing the location of the former USTs, monitoring wells and free product extent is provided at the end of this closure review summary (Arthcon, 2012).
- Nature of Contaminants of Concern: Petroleum hydrocarbons only. It has been determined that the levels of chlorinated solvents in the underlying groundwater were not released from the UST system and were not released at the Site.
- Source: UST system.
- Date reported: March 1995.
- Status of Release: USTs removed.
- Free Product: Noted in site wells in 2012.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1-2	12,000	Gasoline	Removed	1985
3-5	10,000	Diesel	Removed	1985

Receptors

- GW Basin: Coastal Plain of Orange County.
- Beneficial Uses According to California Regional Water Quality Control Board, Santa Ana Region (Regional Water Board) Basin Plan: Municipal and domestic supply.
- Land Use Designation: Commercial.
- Public Water System: Golden State Water Company and Metropolitan Water District of Southern California.
- 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 Site. No other water supply wells were identified within 1,000 feet of the Site in the files reviewed.
- Distance to Nearest Surface Water: There is no identified surface water within 1,000 feet of the Site.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by clayey silt, silty fine sand and sandy silt.
- Maximum Sample Depth: 20 feet below ground surface (bgs).
- Minimum Groundwater Depth: 4.96 feet bgs at monitoring well HMW-9A.
- Maximum Groundwater Depth: 11.99 feet bgs at monitoring well HMW-9A.
- Current Average Depth to Groundwater: Approximately 8 feet bgs.
- Saturated Zones(s) Studied: Approximately 3 - 20 feet bgs.

- Appropriate Screen Interval: Yes.
- Groundwater Flow Direction: North by northwest with an average gradient of 0.004 feet/foot (December 2012).

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (12/19/12, 12/20/12 & 1/8/13)
HMW-2	1996 - 1998	3 - 18	6.69
HMW-3A	2011	5 - 20	7.37*
HMW-4	1996 - 1998	3 - 18	7.01
HMW-5	November 2004	3 - 18	7.61
HMW-7	November 2004	3 - 18	7.20
HMW-8	November 2004	3 - 18	7.26
MMW-1	May 1996	3 - 18	7.42
MMW-2	July 1996	4 - 20	7.55
MMW-3	July 1996	4 - 20	8.25
MMW-4	July 1996	4 - 20	8.61
MMW-5	June 1996	4 - 20	8.26
MMW-6	November 1996	4 - 20	8.29
MMW-7	November 1996	5 - 20	7.74
MMW-8	July 1998	5 - 20	9.00
MMW-9A	November 2004	3 - 18	6.79
MMW-9B	2011	5 - 20	7.32
RW	Not available	Not available	FP (0.13 feet)

FP: Free product, *Free product sheen

Remediation Summary

- Free Product: Was first observed in 1996 continues to be persistent at the Site as evidenced by amounts measured in well RW on 1/8/2013. RW is located in a French drain.
- Soil Excavation: Large diameter auger excavation of the source area was undertaken in 2011.
- In-Situ Soil Remediation: None reported in Geotracker.
- Groundwater Remediation: French drain system with vacuum pumping from 1999 - 2002; hand bailing of free product from 2001 till now; active skimmers from 2004 to present. At least 960 gallons of free product and 70,000 gallons of contaminated groundwater have reportedly been removed since free product recovery was initiated in 1999.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs [mg/kg and (date)]	Maximum 5-10 feet bgs [mg/kg and (date)]
Benzene	<0.005 (07/18/96)	7.4 (07/18/96)
Ethylbenzene	<0.005 (07/18/96)	66 (07/18/96)
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)	TPHd (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl- Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)
MMW-1	12/19/12	95	1,900	1.3	<0.5	<0.5	<2	<1.0	<10
MMW-4	12/19/12	50	<500	3.7	1.9	22	46	<1.0	<10
MMW-5	12/19/12	50	<500	<0.5	<0.5	<0.5	<2	<1.0	<10
MMW-8	12/19/12	<50	<500	<0.5	<0.5	<0.5	<2	<1.0	<10
MMW9A	12/19/12	81	2,200	<0.5	<0.5	3.4	8.9	<1.0	<10
HMW-2	12/19/12	<50	4,400	<0.5	<0.5	<0.5	<2	1.6	<10
HMW-8	12/19/12	<50	1,500	<0.5	<0.5	<0.5	<2	13	<10
WQOs		--	--	1	150	300	1,750	5 ^a	1,200 ^b

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

TPHd: Total petroleum hydrocarbons as diesel

MTBE: Methyl tert-butyl ether

TBA: Tert-butyl alcohol

WQOs: Water Quality Objectives, Regional Water Board Basin Plan

--: Regional Water Board does not have a numeric water quality objective for TPHg or TPHd

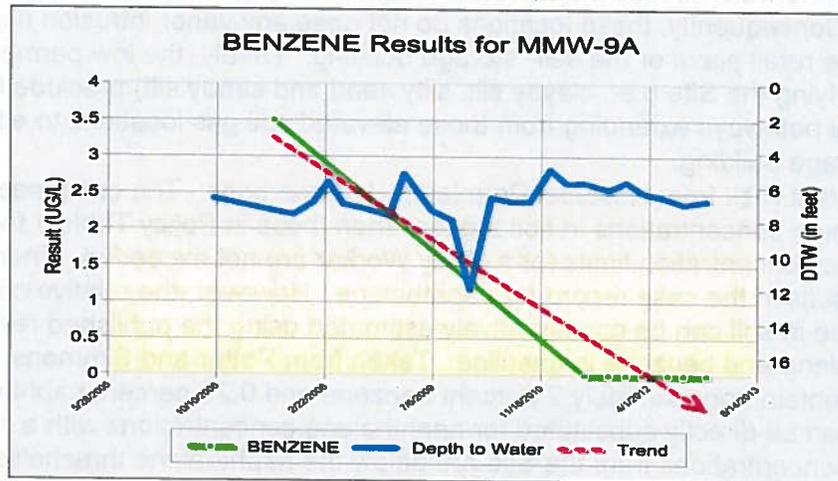
^a: Secondary maximum contaminant level (MCL)

^b: California Department of Public Health, Response Level

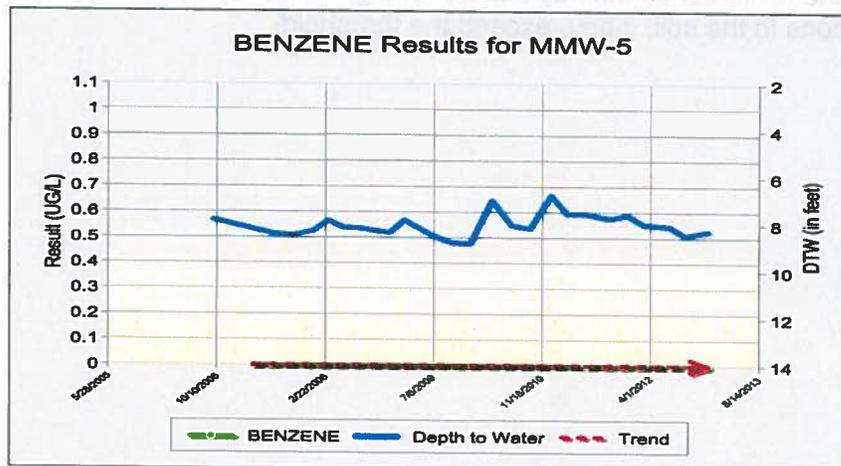
Groundwater Trends

- There are 17 years of groundwater monitoring data for this case. Though free product is still persistent at the Site, water quality objectives have been attained for most for the dissolved contaminants in most wells except for benzene in MMW-1 and MMW-4 and MTBE in HMW-8. Benzene trends are shown below: Source Area (MMW-9A) and Downgradient (MMW-5).

Source Area Well



Downgradient 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: <250 feet long.
- Plume Stable or Degrading: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case does not meet the groundwater plume class criteria as free product is still persistent at the Site and its migration is still being abated.

- **Indoor Vapor Risk 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. Firstly, benzene which is the primary driver for vapor intrusion from groundwater is below its water quality objectives at the Site. Secondly, though elevated levels of benzene and ethylbenzene were reported in the recent soil gas survey, those concentrations were directly measured in locations outside of the building slab/foundation footprint. Consequently, those locations do not pose any vapor intrusion risks as they are not beneath the retail plaza or the self-storage building. Thirdly, the low permeable nature of the soils underlying the Site (i.e., clayey silt, silty sand and sandy silt) preclude the creation of any preferential pathways extending from those elevated soil gas locations to either the retail plaza or self-storage building.
- **Direct Contact Risk from Residual Petroleum Hydrocarbons:** The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial land 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.

ATTACHMENT 3: PREVIOUS RECOMMENDATIONS

- **December 2009:** The Fund staff completed the Preliminary 5-Year Review, and provided the following comments:

SPH still remain at this site. The Fund recommends evaluating the effectiveness of the current SPH recovery methods, and to consider modifying current methods, or utilizing different remedial/recovery technologies to obtain more timely and cost efficient site closure.

- **February 2011:** The Fund staff has completed the Second 5-Year Review. While SPH remain at the site, the long history of the groundwater monitoring demonstrates that the SPH plume is limited to the site and stable. The low BTEX and MTBE concentrations in groundwater also demonstrate the SPH are weathered and have degraded over time. The remaining SPH are unlikely to pose risk to health and the environment.

On December 15, 2011, the LOP ordered a soil vapor survey at the site. The Fund staff suggests that if the results of the soil vapor survey demonstrate low to no risk to the occupants at the site, the site be considered for a low-risk closure.