REVIEW SUMMARY REPORT – CONCUR
FOURTH REVIEW – FEBRUARY 2014

Agency Information

Agency Name: Central Valley Regional Water Quality Control Board (Regional Water Board)	Address: 11010 Sun Center Drive, #200 Rancho Cordova, CA 95670
Agency Caseworker: David Stavarek	Case No.: 570301

Case Information

USTCF Claim No.: 14748	GeoTracker Global ID: T0611300247
Site Name: M&M Mini Mart	Site Address: 1085 East Street Woodland, CA 95695
Responsible Party: DiepenBrock Attn: Catalino Antonio	Address: 400 Capitol Mall, Suite 800 Sacramento, CA 95814
USTCF Expenditures to Date: $1,267,360	Number of Years Case Open: 14

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0611300247

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).** Previous Recommendations are included in **Attachment 3: Previous Recommendations.** Highlights of the case follow:

This case is a vacant former commercial petroleum fueling facility. An unauthorized release was reported in August 1999 following the removal of three gasoline USTs in March 1999. An unknown volume of impacted soil was excavated to a depth of 10 feet and disposed offsite in 1999. Ozone sparging was conducted between October 2007 and January 2008. Since 2000, 37 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).

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 Site. No other water supply wells have been identified within 1,000 feet of the Site in files reviewed. Water is provided to water users near the Site by the City of Woodland. The affected groundwater is not currently being used as a source of drinking 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.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case does not meet Policy criteria because the extent of groundwater contamination is not defined.
- 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. Excavation was conducted to a depth of 10 feet. The maximum benzene concentration in groundwater is less than 100 micrograms per liter (µg/L). The minimum depth to groundwater is greater than 5 feet.
- 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.

Objections to Closure and Responses

According to the Path to Closure page in GeoTracker, the Regional Water Board opposes closure because:

- Secondary source remains.
  RESPONSE: Secondary source as defined by the Policy was removed by excavation in 1999.
- The case does not meet the Policy vapor criteria.
  RESPONSE: The case meets Policy Criterion 2b.

Recommendation

The Fund concurs with the Regional Water Board that post remediation monitoring should continue to establish plume stability.

Original signed by James Young for 2/14/14
_____
Kirk Larson, P.G. Date
Engineering Geologist
Technical Review Unit
(916) 341-5663

Original signed by 2/14/14
_____
Robert Trommer, C.H.G. Date
Senior Engineering Geologist
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]

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.	☒ Yes ☐ No
Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?	☐ Yes ☒ No
If so, was the corrective action performed consistent with any order?	☐ Yes ☐ No ☒ NA
<u>General Criteria</u> General criteria that must be satisfied by all candidate sites:	
Is the unauthorized release located within the service area of a public water system?	☒ Yes ☐ No
Does the unauthorized release consist only of petroleum?	☒ Yes ☐ No
Has the unauthorized ("primary") release from the UST system been stopped?	☒ Yes ☐ No
Has free product been removed to the maximum extent practicable?	☒ Yes ☐ No ☐ NA
Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?	☒ Yes ☐ No

[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

Has secondary source been removed to the extent practicable?	☒ Yes ☐ No
Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?	☒ Yes ☐ No
Nuisance as defined by Water Code section 13050 does not exist at the Site?	☒ Yes ☐ No
Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?	☐ Yes ☒ No
<u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria: **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:	
Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?	☐ Yes ☒ No ☐ NA
Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites? If YES, check applicable class: ☐ **1** ☐ **2** ☐ **3** ☐ **4** ☐ **5**	☐ Yes ☒ No ☐ NA
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?	☐ Yes ☐ No ☒ NA
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.	
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.	☐ Yes ☒ No
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? If YES, check applicable scenarios: ☐ **1** ☐ **2** ☐ **3** ☐ **4**	☐Yes ☐ No ☒ NA

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?	☒ Yes ☐ No ☐ NA
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?	☐ Yes ☐ No ☒ NA
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).	
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)?	☒ Yes ☐ No ☐ NA
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?	☐ Yes ☐ No ☒ NA
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?	☐ Yes ☐ No ☒ NA

ATTACHMENT 2: SUMMARY OF BASIC CASE INFORMATION (Conceptual Site Model)

Site Location/History

- This case is a vacant former commercial petroleum fueling facility.
- The Site is bounded by residences across East Street to the west, businesses to the north, residences to the east, and the Yolo County Fairgrounds to the south.
- A Site map showing the location of the former USTs, monitoring wells, groundwater level directions, and contaminant concentrations is provided at the end of this review summary (GeoCon, 2013).
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: August 1999.
- Status of Release: USTs removed.

Tank Information

Tank no.	Size in gallons	Contents	Closed in place/ Removed/Active	Date
1	8,000	Gasoline	Removed	March 1999
2	10,000	Gasoline	Removed	March 1999
3	12,000	Gasoline	Removed	March 1999

Receptors

- GW Basin: Sacramento Valley - Yolo.
- Beneficial Uses: Regional Water Board Basin Plan lists agricultural, municipal, domestic, industrial service and process supply.
- Land Use Designation: Aerial photograph available on GeoTracker indicates mixed residential and commercial land use in the vicinity of the Site.
- Public Water System: City of Woodland.
- 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 interbedded and intermixed sand, silt, and clay.
- Maximum Sample Depth: 113 feet below ground surface (bgs).
- Minimum Groundwater Depth: 13.74 feet bgs at monitoring well MW-7.
- Maximum Groundwater Depth: 30.58 feet bgs at monitoring well MW-13D.
- Current Average Depth to Groundwater: Approximately 30 feet bgs.
- Saturated Zones(s) Studied: Approximately 14 - 102 feet bgs.
- Appropriate Screen Interval: Yes.
- Groundwater Flow Direction: East southeast at a gradient between 0.009 and 0.001 feet per foot (August 2013).

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (08/27/13)
MW-1	April 2002	?-30	Abandoned in 9/12
MW-2	April 2002	?-30	29.73
MW-3	April 2002	?-29	29.84
MW-4	April 2002	?-29	Abandoned in 9/12
MW-5	January 2004	?-32	29.54
MW-6S	January 2004	?-50	30.40
MW-6D	January 2004	?-60	30.45
MW-7	January 2004	?-26	Abandoned in 9/12
MW-8S	January 2004	?-40	Abandoned in 9/12
MW-8D	January 2004	?-58	Abandoned in 9/12
MW-9	January 2004	?-30	28.56
MW-10S	January 2004	?-42	Abandoned in 9/12
MW-10D	January 2004	?-60	Abandoned in 9/12
MW-11	July 2004	?-30	29.28
MW-12S	March 2006	?-30	Abandoned in 9/12
MW-12I	March 2006	?-62	Abandoned in 9/12
MW-12D	March 2006	?-76	Abandoned in 9/12
MW-13S	March 2006	?-30	Well Dry
MW-13I	March 2006	?-62	30.27
MW-13D	March 2006	?-75	30.58
MW-14S	March 2006	?-30	29.67
MW-14I	March 2006	?-48	30.39
MW-14D	March 2006	?-78	30.70
MW-15S	March 2006	?-30	28.99
MW-15I	March 2006	?-53	29.49
MW-15D	March 2006	?-76	30.02
MW-15S	March 2006	?-30	28.99
MW-16I	March 2006	?-58	Abandoned in 9/12
MW-16D	March 2006	?-80	Abandoned in 9/12
MW-17S	September 2007	15-30	Abandoned in 9/12
MW-17I	October 2007	54-59	Abandoned in 9/12
MW-17D	October 2007	70-75	Abandoned in 9/12
MW-18D	October 2007	80-85	29.73
MW-18DR	October 2007	96-102	30.24
MW-19S	October 2008	15-30	28.33
MW-19I	October 2008	54-60	30.01
MW-19D	October 2008	74-79	29.93

Remediation Summary

- Free Product: None noted in GeoTracker.
- Soil Excavation: Unknown volume of impacted soil was excavated to a depth of 10 feet and disposed offsite in 1999.
- In-Situ Soil Remediation: None conducted.
- Groundwater Remediation: Ozone sparging pilot test was conducted between October 2007 and January 2008.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs [mg/kg (date) sample-depth]	Maximum 5-10 feet bgs [mg/kg (date) sample-depth]
Benzene	<5.0 (04/02/02) MW-2-5'	<5.0 (04/02/02) MW-2-10'
Ethylbenzene	<5.0 (04/02/02) MW-2-5'	<5.0 (04/02/02) MW-2-10'
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

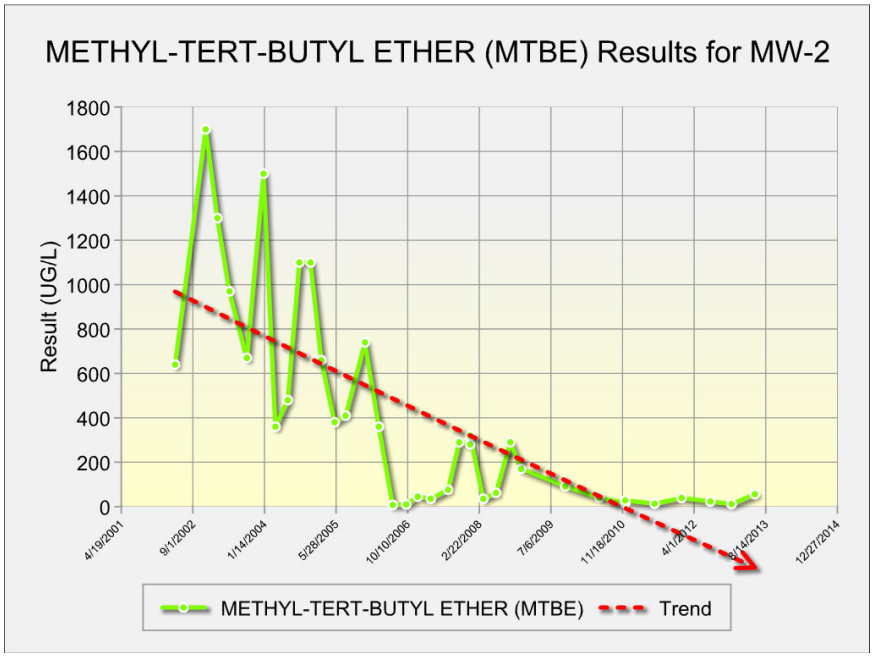
Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)
MW-1	12/10/08	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-2	05/28/13	**50**	**<0.5**	<0.5	<0.5	<1.5	**56**	<10
MW-3	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-4	12/10/08	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-5	12/10/08	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-6S	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	2.0	<10
MW-6D	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	**7.9**	<10
MW-7	06/10/10	**<50**	**<0.5**	<0.5	0.32	<1.5	<0.5	<10
MW-8S	10/14/09	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-8D	10/14/09	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-9	05/30/13	**70**	**<0.5**	<0.5	<0.5	<1.5	**90**	<10
MW-10S	12/10/08	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<5.0
MW-10D	12/10/08	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<5.0
MW-11	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	0.92	12
MW-12S	07/23/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-12I	07/23/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-12D	07/23/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-13S	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-13I	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-13D	08/27/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-14S	05/28/13	**50**	**<0.5**	<0.5	<0.5	<1.5	**180**	<10
MW-14I	05/28/13	**500**	**<0.5**	<0.5	<0.5	<1.5	**810**	<10
MW-14D	08/27/13	**100**	**<0.5**	<0.5	<0.5	<1.5	**150**	<10
MW-15I	05/28/13	**60**	**<0.5**	<0.5	<0.5	<1.5	**88**	<10
MW-15D	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	**130**	<10
MW-15S	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	**13**	<10
MW-16I	05/31/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-16D	05/31/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<5.0
MW-17S	05/31/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-17I	07/23/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-17D	07/23/12	**<50**	**<0.5**	<0.5	<0.5	<1.5	<0.5	<10
MW-18D	08/27/13	**140**	**<0.5**	<0.5	<0.5	<1.5	**210**	<10
MW-18DR	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	3.6	<10
MW-19S	05/28/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	7.9	<10
MW-19I	08/27/13	**<50**	**<0.5**	<0.5	<0.5	<1.5	**49**	<10
MW-19D	08/27/13	**80**	**<0.5**	<0.5	<0.5	<1.5	**140**	<10
WQO	**-**	**5**	**0.15**	**42**	**29**	**17**	**5**	**1,200[a]**

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
[a]: California Department of Public Health, Response Level

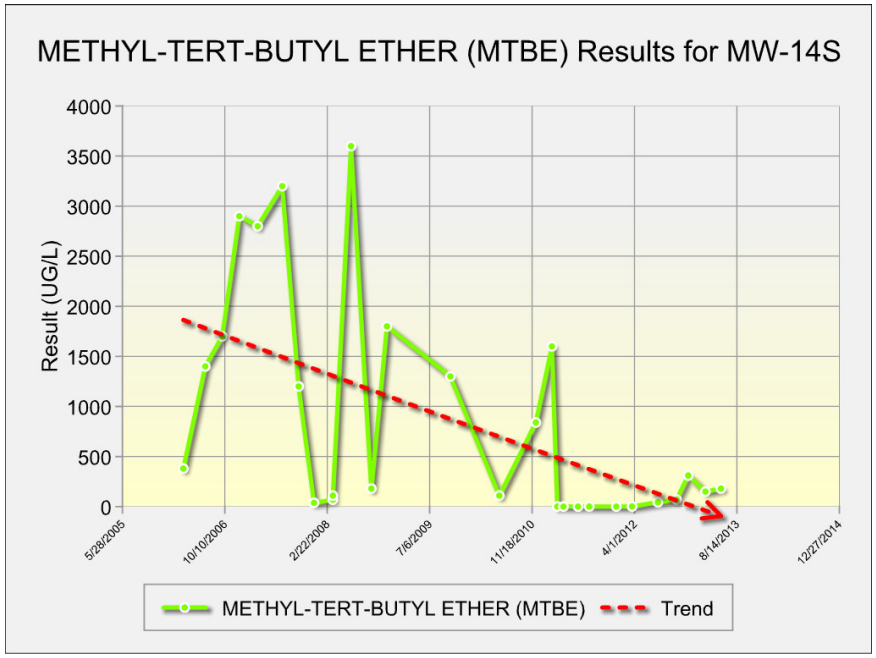
Groundwater Trends

- Since 2000, 37 groundwater monitoring wells have been installed and monitored. MTBE trends are shown below: Source Area (MW-2) and Downgradient (MW-14S).

Source Area Well



Downgradient Well



Evaluation of Current Risk

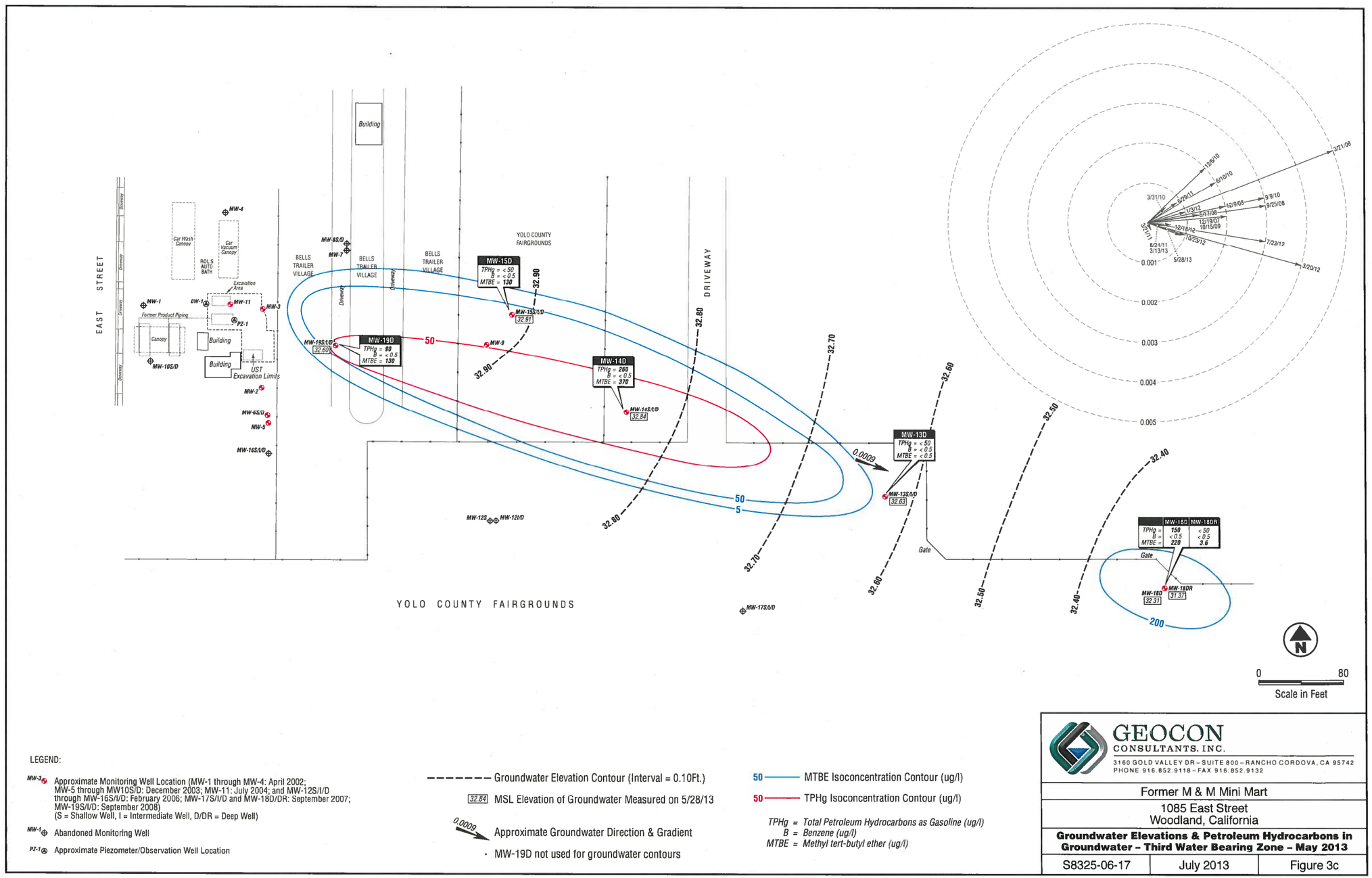
- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for MTBE: Yes.
- Oxygen Concentrations in Soil Vapor: None reported.
- Plume Length: Undefined.
- Plume Stable or Decreasing: No.
- Contaminated Zone(s) Used for Drinking Water: No.
  Groundwater Risk from Residual Petroleum Hydrocarbons: The case does not meet Policy criteria because the extent of groundwater contamination is not defined.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: 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. Excavation was conducted to a depth of 10 feet. The maximum benzene concentration in groundwater is less than 100 µg/L. The minimum depth to groundwater is greater than 5 feet.
- 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/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.

ATTACHMENT 3: PREVIOUS RECOMMENDATIONS

In November 2007, the Fund made the following recommendation: Over $567,441 has been spent investigating this site yet no remedial actions have been taken, while the groundwater plume has been migrating east. The Fund recommends the Responsible Party assess the most cost effective remedial option and implement that technology without further delay. The Fund will review this site next year to track progress.

UPDATED, November 2008, the Fund recommends that the Regional Board continue to require that the Responsible Party implement active remediation without further delay and to consider formal enforcement action if necessary to expedite active remediation. The Fund will review this site next year to track progress.

UPDATED, November 2009, this investigation has been underway for 10 years and active remediation is overdue. The delay in treating the plume in 2002 when the degree of contamination in the source area was known has allowed this plume to migrate down gradient impacting a larger area. The Fund recommends that the Regional Board require that the Responsible Party implement active remediation without further delay. The Fund will review this site next year to track progress.



LEGEND:

- MW-3 — Approximate Monitoring Well Location (MW-1 through MW-4: April 2002; MW-5 through MW10S/D: December 2003; MW-11: July 2004; and MW-12S/I/D through MW-16S/I/D: February 2006; MW-17S/I/D and MW-18D/DR: September 2007; MW-19S/I/D: September 2008) (S = Shallow Well, I = Intermediate Well, D/DR = Deep Well)
- MW-1 — Abandoned Monitoring Well
- PZ-1 — Approximate Piezometer/Observation Well Location
- Groundwater Elevation Contour (Interval = 0.10Ft.)
- 32.84 — MSL Elevation of Groundwater Measured on 5/28/13
- 0.0009 — Approximate Groundwater Direction & Gradient
- MW-19D not used for groundwater contours
- 50 — MTBE Isoconcentration Contour (ug/l)
- 50 — TPHg Isoconcentration Contour (ug/l)

TPHg = Total Petroleum Hydrocarbons as Gasoline (ug/l)
B = Benzene (ug/l)
MTBE = Methyl tert-butyl ether (ug/l)

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Former M & M Mini Mart
1085 East Street
Woodland, California

Groundwater Elevations & Petroleum Hydrocarbons in Groundwater – Third Water Bearing Zone – May 2013

S8325-06-17	July 2013	Figure 3c