

State Water Resources Control Board

July 22, 2014

Ms. Jennifer Sedlachek
ExxonMobil Oil Corporation
3700 West 190th Street, building TPT2
Torrance, CA 90509-2929

Dear Ms. Sedlachek:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, MOBIL BULK PLANT, 30995 UNION CITY BOULEVARD, ALAMEDA, ALAMEDA COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy.

The subject site has the following identification numbers:

- GeoTracker No. T0600100918
- San Francisco Bay Regional Water Quality Control Board (Regional Water Board) Case No. 01-0995
- Alameda County Water District (ACWD) Case No. TT0322

The State Water Board reviewed the closure request dated January 14, 2014, the response from Regional Water Board in the GeoTracker record. The Regional Water Board disagrees with the proposed UST case closure because the secondary source has not been removed to the extent practicable and Petroleum Vapor Intrusion to Indoor Air Media-Specific Criteria has not been met.

After careful consideration of the GeoTracker record, I have determined that this site does not meet the following General and Media-Specific Criteria: General Criteria f - the secondary source has been removed to the extent practicable; or Vapor Intrusion to Indoor Air Media-Specific Criteria a, Scenario 4 (existing residential building) - Where no bioattenuation zone exists, the concentrations of benzene, and naphthalene in soil gas shall be less than 85 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), and 93 $\mu\text{g}/\text{m}^3$, respectively.

There is a significant amount of petroleum in groundwater near the secondary source. Although the plume is delineated, a secondary source of elevated petroleum contaminant concentrations exists in shallow soil near the existing residential building. During March 2013, benzene concentrations in groundwater were 220 micrograms per liter.

Between 2012 and 2014, concentrations of benzene in groundwater monitoring wells MW-1 and MW-7A have increased by an order of magnitude.

On October 11, 2013, concentrations of total petroleum hydrocarbons at soil sample location SVS1 were detected above 110 mg/kg at 5 feet below ground surface (bgs). On April 9, 2014, soil vapor samples from location SVS1 detected concentrations of total petroleum hydrocarbons, in the gasoline range, and benzene up to 2,700,000 $\mu\text{g}/\text{m}^3$, and 160 $\mu\text{g}/\text{m}^3$, respectively at 5 feet bgs.

The secondary source continues to pose a threat to human health, safety and the environment. Criteria for low-threat UST case closure have not been met at this time, and therefore, closure of the UST case is not appropriate.

If you have any questions, please contact Mr. Benjamin Heningburg at (916) 341-5749 or benjamin.heningburg@waterboards.ca.gov

Sincerely,


Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: [Via -email only]

Mr. Bruce Wolfe, Executive Officer
San Francisco Bay Regional Water Quality Control Board
(bruce.wolfe@waterboards.ca.gov)

Mr. Laurent Meillier
San Francisco Bay Regional Water Quality Control Board
(laurent.meillier@waterboards.ca.gov)

Ms. Barbara Sieminski
San Francisco Bay Regional Water Quality Control Board
(bsieminski@waterboards.ca.gov)

Mr. Benjamin Heningburg
State Water Resources Control Board
(benjamin.heningburg@waterboards.ca.gov)

Mr. Steven Inn
Alameda County Water District
(steven.inn@acwd.com)

Mr. Greg Gruss,
Cardno ERI
(greg.gurss@cardno.com)