

## State Water Resources Control Board

February 26, 2015

Mr. Charles Carmel  
Atlantic Richfield Company  
Post Office Box 1257  
San Ramon, CA 94583  
[Via email only] ([Charles.Carmel@bp.com](mailto:Charles.Carmel@bp.com))

Dear Mr. Carmel:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK  
CASE, FORMER ARCO STATION 4944, 614 CUTTING BOULEVARD, RICHMOND,  
CONTRA COSTA 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. T0601394027
- San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board), Case No. 07-0814

The State Water Board reviewed the closure request dated May 6, 2014 and responses from the San Francisco Bay Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the San Francisco Bay Water Board staff determination that all of the General and Media-Specific Criteria have not been met. Based on information in the above-referenced case file, this agency finds that this site does not meet the following General and Media-Specific Criteria:

- General Criteria f – Secondary source has been removed to the extent practicable.
- Petroleum Vapor Intrusion to Indoor Air Scenario 3 (1 of 2) – Where benzene concentrations are less than 100 micrograms per liter ( $\mu\text{g/L}$ ), the bioattenuation zone shall be a continuous zone that provides a separation of at least 5 feet vertically between the dissolved phase benzene and the foundation of existing or potential buildings; and contain total petroleum hydrocarbon (TPH) as gasoline and TPH as diesel less than 100 milligrams per kilogram ( $\text{mg/kg}$ ) throughout the entire depth of the bioattenuation zone.

There is a significant amount of petroleum constituents in soil and groundwater at the site. Following the 2011 vacuum extraction event, benzene concentrations increased to 3,300  $\mu\text{g/L}$  in well MW-1.

Well MW-1 is located near the former dispenser islands and is screened across the groundwater table that is approximately 7 feet below ground surface (bgs). This site is a vacant lot and the petroleum contamination is located in shallow soil and groundwater, therefore, there appears to be no apparent physical or infrastructural constraints that prevent additional secondary source removal.

During August 2014, the concentration of benzene in groundwater monitoring well MW-1 was 860 µg/L. Benzene concentrations in groundwater exceed the required characteristics of a 5 feet bioattenuation zone. Soil samples collected near well MW-1 during 1999, indicate that total TPH concentrations were above 100 mg/kg within 5 feet bgs. There is insufficient post remediation soil data within the 5 feet bioattenuation zone to assess current concentrations of total TPH in soil.

Petroleum constituents in soil and groundwater continue 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 Ben Heningburg at (916) 341-5749 or [Benjamin.Heningburg@waterboards.ca.gov](mailto:Benjamin.Heningburg@waterboards.ca.gov).

Sincerely,



Victoria A. Whitney, Deputy Director  
Division of Water Quality

cc: Mr. Luis Windhurst  
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[Via email only]

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