REVIEW SUMMARY REPORT – CLOSURE
FOURTH REVIEW – JULY 2015

Agency Information

Agency Name: Santa Anna Regional Water Quality Control Board (Regional Water Board)	Address: 3737 Main Street, Suite 500, Riverside, CA 92501-3316
Agency Caseworker: Nancy Olson-Martin	Case No.: 083001166T

Case Information

USTCF Claim No.: 3077	GeoTracker Global ID: T0605900921
Site Name: Isacc, Inc. (Village Paint & Body)	Site Address: 1734 W. 1st Street Santa Ana, CA 92703
Responsible Party: BBR Banker. LLC. Assignee C/O Frey Environmental, Inc.	Address: 2817 A-Lafayette Ave Newport Beach, CA 92663
Responsible Party: Isacc, Inc.	Address: 2201 Dupont Drive, Suite 850 Irvine, CA 92715-1515
USTCF Expenditures to Date: $1,456,394	Number of Years Case Open: 26

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=T0605900921

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 a former Coca-Cola bottling plant that had petroleum fueling capabilities. Currently is as a strip retail center with multiple merchants. An unauthorized release was reported in January 1989 following the removal of three USTs (two gasoline, one waste oil). An unknown volume of affected groundwater was removed during the UST removal. Approximately 2,059 tons of impacted soil were removed and disposed offsite in 2000. Between October 2008 and april 2014 a combination of air sparging, dual phase extraction and soil vapor extraction has resulted in the removal of 5,577 pounds of TPHg and 1,068,020 gallons of groundwater treated and disposed. No active remediation has been conducted at the Site for the past year. Since 1996, thirty-nine groundwater monitoring and various remediation wells have been installed with only sixteen being regularly monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except for benzene in wells EW-4A and EW-10.

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 defined plume boundary. No other water supply wells have been identified within1,000 feet of the defined plume boundary 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 Remaining petroleum hydrocarbon constituents are limited and stable, and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

- General Criteria: This case meets all eight Policy General Criteria.
- Groundwater Specific Criteria: The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 micrograms per liter (µg/L), and the dissolved concentration of methyl tertiary butyl ether (MTBE) is less than 1,000 µg/L.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2a by Scenario 4 with no bioattenuation zone. The maximum benzene, ethylbenzene, and naphthalene concentrations in soil gas are less than, respectively, 280 micrograms per cubic meter (µg/m^3), 3,600 µg/m^3, and 310 µg/m^{3}at a depth of five feet. These levels meet the Commercial soil gas criteria.
- 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.

Determination

The Fund Manager has prepared this review summary report summarizing the reasons for this determination, provided the Review Summary Report to the applicable Regional Water Board and Local Oversight Agency Program, as appropriate, with an opportunity for comment on the Review Summary Report.

Pursuant to Health and Safety Code as of the date of the signature of the Fund Manager below, neither the Regional Water Board or the Local Oversight Program shall issue a corrective action directive or enforce an existing corrective action directive for the tank case until the board issues a decision on the closure of the tank case, unless one of the following applies:

(A) The Regional Water Board or Local Oversight Program agency demonstrates to the satisfaction of the Fund Manager that there is an imminent threat to human health, safety, or the environment;

(B) The Regional Water Board or Local Oversight Program agency demonstrates to the satisfaction of the Fund Manager that other site-specific needs warrant additional directives during the period that the State Board is considering case closure;

(C) After considering responses to the Review Summary Report and other relevant information, the Fund Manager determines that case closure is not appropriate; or

Isacc, Inc.
1734 W. 1st Street, Santa Ana,
Claim No: 3077

(D) The Regional Water Board or Local Oversight Program agency closes the tank case but the directives are necessary to carry out case-closure activities.

Pat G. Cullen 6/26/15

Pat G. Cullen, P.G. Date
Engineering Geologist
Technical Review Unit
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Robert Trommer 6/26/15

Robert Trommer, C.H.G. Date
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Lisa Babcock, P.G. 3939, C.E.G. 1235 Date
Fund Manager

Objections to Closure and Response
Regarding Isaac, Inc. (Village Paint & Body), 1734 W. 1st Street, Santa Ana
Claim 3077

Based on an email in GeoTracker from the County to the RP consultants, dated Tuesday, January 6, 2015, the County objects to closure for the following reasons:

Concern 1: We required that confirmation soil borings be drilled down to 50 feet or until a 20-foot clean zone (see attached letter) was established. Confirmation soil borings PR2, PR3, and PR4 only went down to 7 feet, 5 feet, and 13 feet bgs, respectively. This requirement was discussed in the attached letter. Also, I requested that the sample analysis also include TRPH. It is our understanding that the TPPH analysis was left off the analytical methods included in the Chain of Custody (COC) along with the 8250 full scan analysis. In order to reduce costs, we agreed to this rather than 8015 for TPH-g.
Response 1: Adequate soil sampling is available in the files reviewed; no additional soil sampling is necessary to meet the Policy criterion.

Concern 2: We also question why proposed soil confirmation boring PR1 (in the southern area) could not be drilled while a previous consultant was able to install nearby wells MW1 and MW18. Would a difference in the drilling rig or equipment been more successful?
Response 2: As stated in Response 1 no additional soil sampling is necessary to meet the Policy closure criterion.

Concern 3: The LTCP requires confirmation samples at the 5 and 10-foot depths. No 10-foot depth samples were collected and analyzed.
Response 3: Sufficient soil samples have been collected to meet closure criterion.

Concern 4: Benzene [in groundwater} is still up to 1,900 ppb (EW10).
Response 4: The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 micrograms per liter (µg/L), and the dissolved concentration of methyl tertiary butyl ether (MTBE) is less than 1,000 µg/L.

Concern 5: So, we have real concerns about these soil confirmation borings; lack of deeper borings and deeper samples (no 20-foot clean zone was established), no 10-foot samples as required by the LTCP were collected and analyzed, the lack of TPPH or TPH-g sample results, etc.
Response 5: Adequate soil samples have been collected and are in the record to satisfy the Policy criterion for closure.