State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
PRELIMINARY REVIEW – SEPTEMBER 2014

Agency Information

Agency Name: Santa Clara County Environmental Health Department (County)	Address: 1555 Berger Drive, Suite 300 San Jose, CA 95112
Agency Caseworker: Aaron Costa	Case No.: 07S1W22J02f

Case Information

USTCF Claim No.: 5107	GeoTracker Global ID: T0608501240
Site Name: Shell	Site Address: 1025 Winchester Blvd. San Jose, CA 95128
Responsible Party: Shell Oil Products Attn: Sam Brenneke	Address: 20945 South Wilmington Ave. Carson, CA 90810
USTCF Expenditures to Date: $0	Number of Years Case Open: 20

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=T0608501240

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. Highlights of the case follow:

This case is an active commercial petroleum fueling facility. An unauthorized release was reported in July 1994. One waste oil UST was removed and an unknown amount of impacted soil was excavated and disposed offsite in 2006. Soil vapor extraction was conducted between April 2002 and October 2006, which reportedly removed 2,302 pounds of total petroleum hydrocarbons as gasoline (TPHg). Since 2001, six 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 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 within 1,000 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 the affect shallow 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 Criterion because there is a lack of current groundwater data to assess plume stability.
- Vapor Intrusion to Indoor Air: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk
- 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, finalized on June 18, 2014, the County objects to UST case closure because:

- Inadequate conceptual site model.
  RESPONSE: Adequate data has been collected to develop a conceptual site model as defined by the Policy.
- The case does not meet Policy groundwater criteria.
  RESPONSE: We concur.
- The case does not meet Policy direct contact criteria.
  RESPONSE: The case meets Policy Criterion 3a.

Recommendation

There is a lack of current groundwater monitoring data due to low groundwater levels and the last complete groundwater monitoring event occurred in 2011. The Fund concurs with the County that the responsible party conduct additional groundwater monitoring and collect samples from all available monitoring wells to access plume stability.

Several monitoring wells have been dry. The Fund recommends installing replacement wells if necessary, and installing additional well(s) in the downgradient direction west of S-1B.

9/30/14

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