State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
THIRD REVIEW – JANUARY 2015

Agency Information

Agency Name: Humboldt County Environmental Health Department (County)	Address: 100 H Street, Suite 100 Eureka, CA 95501
Agency Caseworker: Mark Verhey	Case No.: 12266

Case Information

USTCF Claim No.: 3711	GeoTracker Global ID: T0602300198
Site Name: Northwood Chevrolet	Site Address: 212 Seventh Street Eureka, CA 95501
Responsible Party: Mark Dias Northwood Chevrolet	Address: 212 Seventh Street Eureka, CA 95501
USTCF Expenditures to Date: $941,538	Number of Years Case Open: 24

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=T0602300198

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 automobile dealership and repair shop. Two gasoline USTs were closed in place. An unauthorized release was reported in June 1990 following the removal of three additional USTs (gasoline, diesel, and waste oil). In 1994, approximately 12 cubic yards of impacted soil was removed from the former waste oil UST cavity. A dual phase extraction (DPE) system operated from September 2010 to July 2014 and removed approximately 8,408 pounds of petroleum hydrocarbons in vapor phase. Since 1996, thirteen groundwater monitoring and extraction wells have been installed and irregularly monitored until 2010, when the DPE operation began. A higher vacuum DPE test has been completed recently. Post remediation groundwater monitoring is underway. According to groundwater data, water quality objectives have not been achieved.

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 Site. No other water supply wells have been identified within 1,000 feet of the Site 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 affected 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 Criteria. Free product remains in the source area, and post remediation groundwater monitoring is still necessary to evaluate the current plume conditions.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2a by Scenario 3b. The maximum benzene concentration in groundwater is less than 1,000 µg/L. The minimum depth to groundwater is greater than 10 feet, overlain by soil containing less than 100 mg/kg of TPH.
- 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

Based on a phone conversation dated January 13, 2015, the County suggested additional free product removal before the case may be evaluated for closure. Based on another phone conversation with the current consultant (West & Associates) on January 14, 2015, a higher vacuum extraction test was conducted recently. It is speculated the remaining free product in the source area consists mainly weathered diesel. Additional free product removal may not be practical or necessary.

RESPONSE: Post remediation groundwater monitoring should resume to evaluate the current plume conditions.

Recommendation

The State Water Board recommends resume post remediation groundwater monitoring to determine the current plume conditions.

Original signed by James Young for

01/15/15

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