

State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK PRELIMINARY REVIEW – NOVEMBER 2014

Agency Information

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| Agency Name: Santa Clara County LOP | Address: 1555 Berger Drive, Suite 300 San Jose, CA 95112-2716 |
| Agency Caseworker: Gerald O'Regan | Case No: 07S1E10J01f |

Case Information

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| USTCF Claim No.: 6593 | Global ID: T0608500119 |
| Site Name: All Star Gas | Site Address: 1620 Story Road San Jose, CA 95122 |
| Responsible Party: Bhula M. Patel | Address: 1620 Story Road San Jose, CA 95122 |
| USTCF Expenditures to Date: \$1,479,072 | Number of Years Case Open: 29 |

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=T0608500119

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 leak was reported in September 1985 followed by the removal of four gasoline USTs. Monitoring wells have been installed and contaminated soil excavated. Soil excavation and vapor extraction/air sparging has been conducted. The periodic groundwater sampling of twelve previously installed monitoring wells occurred until 2008. Since 2009, 21 additional groundwater monitoring wells have been installed and monitored. Recent data suggests significant petroleum fuel contaminant concentrations remain.

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 impacted 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 does not meet all eight Policy general criteria. Additional data are needed to develop a conceptual site model that assesses the nature, extent, and mobility of the release.
- Groundwater Specific Criteria: The case does not meet Policy criteria because the maximum benzene concentrations are greater than 3,000 ug/L, and the contaminant plume is not fully defined to the north in the downgradient direction.
- 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

The County objects to UST case closure (July 11, 2014 letter) because:

- A conceptual model that assesses the nature, extent and mobility of the release has not been completed, in particular, the downgradient extent of the plume has not been defined.

RESPONSE: The Fund concurs.

Recommendation

The Fund concurs with the County directives for further characterization and suggests that the responsible party institute focused groundwater remediation to reduce the benzene concentrations.



Walter Bahm, P.E. 11/3/14
Date
Water Resources Control Engineer
Technical Review Unit
(916) 341-5735



Robert Trommer, CHG 11/3/14
Date
Senior Engineering Geologist
Chief, Technical Review Unit
(916) 341-5684