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GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

December 13, 2013

Chuck Headlee
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

PRELIMINARY REVIEW SUMMARY REPORT FOR CLAIM NUMBER 15588; SITE ADDRESS: 1998 TICE VALLEY RD, WALNUT CREEK

The UST Cleanup Fund (Fund) has completed our review of RWQCB, Region 2 (Regional Board) case number 07-0789. The Preliminary Review Summary Report for this case is enclosed for your information and comment. Please note that the Fund's recommendations are based on review of information contained in the Fund's case files, data currently in the Geotracker database and any other sources of information that were readily available to Fund staff at the time the review was conducted. Consequently, they may not reflect historical information that has not been uploaded to the Geotracker database or available in the Fund's case files and any data that has been recently submitted to your office.

The Fund requests that the Regional Board staff notify the Fund within 45 days from the date of this letter as to whether you agree or disagree with our recommendations for this case. If you agree with our recommendation, we request that you provide the Fund with an estimated timeframe to either implement the recommendations for additional corrective action or for closing this case. If you do not agree with our recommendations, we request that you provide the Fund with a summary of the reasons for disagreeing and/or impediments to implementing the recommendations for additional corrective action or closing this case. Responses to the Fund may be provided by e-mail, letter or a copy of correspondence to the RP, if the correspondence addresses all the information requested by the Fund.

Fund staff will be sending copies of all completed Review Summary Reports to claimants 45 days from the date of this letter unless the Regional Board notifies the Fund that they wish to discuss this case prior to transmittal to the claimant. If you or your staff has any questions or concerns on specific reports that you would like to discuss with the Fund prior to transmittal of the report to the claimant, please contact us within this period. The Fund reviewer name and telephone number are included on the last page of the summary Report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Trommer".

Robert Trommer
Senior Engineering Geologist
Chief, Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc by email: Kevin Brown/Regional Water Board

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK PRELIMINARY REVIEW – DECEMBER 2013

Agency Information

Agency Name: San Francisco Bay Regional Water Quality Control Board (Regional Water Board)	Address: 1515 Clay Street, Suite 1400 Oakland, CA 94612
Agency Caseworker: Kevin Brown	Case No.: 07-0789

Case Information

USTCF Claim No.: 15588	GeoTracker Global ID: T0601300733
Site Name: Chevron	Site Address: 1998 Tice Valley Boulevard Walnut Creek, CA 94598
Responsible Party: Chevron Products Company Attn: Joe Watterson	Address: 6101 Bollinger Canyon Road Bld BR1X #5339 San Ramon, CA 94583
USTCF Expenditures to Date: \$0	Number of Years Case Open: 15

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0601300733

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. A summary evaluation of compliance with the Policy is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Case Information (Conceptual Site Model)**. Highlights of the case follow:

This case is an active commercial petroleum fueling facility. An unauthorized release was reported in April 1998 following the removal of one waste oil UST and over-excavation of the tank cavity to approximately 8.5 feet below surface. Approximately 40 cubic yards of impacted soil were removed and disposed offsite. In January 2009 during vapor recovery system upgrade, a product line was damaged and released four gallons of gasoline. Impacted soil at the release was removed. Since 2005 six groundwater monitoring wells have been installed and irregularly monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all major petroleum constituents except for methyl tert-butyl ether (MTBE) and 1,2-dichloroethane (1,2-DCA).

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no supply wells regulated by the California Department of Public Health within 1,000 feet of the projected plume boundary. No other water supply wells have been

identified within 1,000 feet of the projected plume boundary in files reviewed. Tice Creek is located approximately 300 feet southeast from the projected plume boundary. Water is provided to water users near the Site by East Bay Municipal Utility District. The affected groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the foreseeable future.

Rationale for Closure under the Policy

- **General Criteria:** The case does not meet all eight Policy general criteria. It is not clear whether the unauthorized release consists only of petroleum because chlorinated organic compounds are also found in the contaminant plume.
- **Groundwater Specific Criteria:** The case meets Policy Criterion 1 by Class 5. Although Tice Creek is located approximately 300 feet southeast from the projected MTBE plume boundary, the concentrations are low and decreasing. Monitoring well MW-3 located between the source of release and the creek has consistently shown low MTBE concentrations, with other petroleum constituents below laboratory detection limits. The nearest water supply well is greater than 1,000 feet from the projected plume boundary. The regulatory agency determines, based on an analysis of site specific conditions, which under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable time frame.
- **Vapor Intrusion to Indoor Air:** This case meets Policy Criterion 2b. A site-specific risk assessment of potential exposure to petroleum constituents as a result of vapor intrusion [Additional Soil Vapor Assessment Report, Arcadis, March 2013] found that maximum concentrations of petroleum constituents remaining in soil and groundwater will have no significant risk of adversely affecting human health.
- **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 directly substituted 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

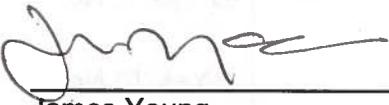
The Regional Water Board objects to UST case closure (October 4, 2013 letter) because:

- The unauthorized release consists not only of petroleum but chlorinated volatile organic compounds (CVOCs).
RESPONSE: Whether the unauthorized release consists of CVOCs is not conclusive because analyses of CVOCs in groundwater have not been required in the past.
- The current conceptual site model (CSM) is incomplete.
RESPONSE: The Policy does not require that a CSM must be complete, as long as sufficient data exist to determine the CSM is developed. Additional data may be necessary to complete the CSM before the case may be closed.

- Secondary source has not been removed to the extent practicable.
RESPONSE: In April 1998 during the waste oil UST removal, although side wall samples contained high levels of petroleum hydrocarbons down to seven feet below surface, the waste oil UST cavity was over-excavated to 8.5 feet below surface. Due to the low concentrations of petroleum constituents in shallow groundwater at the Site, the Cleanup Fund determines that the secondary source was removed to the extent practicable. Likewise, secondary source was removed to the extent practicable during the January 2009 product line release.
- The lateral and vertical extent of groundwater contamination has not been adequately defined, particularly in the deep water zone, and groundwater grab samples from past soil borings revealed much higher concentrations than those in the monitoring wells.
RESPONSE: The single deep monitoring well has consistently shown MTBE and TBA concentrations below or near the water quality objectives, while the shallow monitoring well at the same location contained much higher MTBE and TBA concentrations. Additional deep water zone assessment may run the risk of cross contamination, and the Cleanup Fund does not consider such assessment necessary. In addition, grab water samples do not accurately define groundwater conditions, and regular groundwater monitoring events using the appropriately constructed monitoring wells have shown a decreasing groundwater plume. Based on such data, the Cleanup Fund projects the plume is less than 1,000 feet in length, and will achieve water quality objectives within a reasonable time frame.
- A bioattenuation zone is not present and soil vapor sampling exemption does not apply for this active fueling facility.
RESPONSE: A site-specific risk assessment of potential exposure to petroleum constituents as a result of vapor intrusion [Additional Soil Vapor Assessment Report, Arcadis, March 2013] found that maximum concentrations of petroleum constituents remaining in soil and groundwater will have no significant risk of adversely affecting human health. The soil vapor sampling results also showed oxygen levels ranged from 2.3% to 13% in soil vapor samples collected from 5.5 feet below surface, therefore a bioattenuation zone is likely present.

Recommendation

A full EPA 8260 analysis be performed on groundwater samples collected from all groundwater monitoring wells in the next groundwater monitoring event to evaluate the source of the chlorinated solvents at this Site.



James Young
Water Resources Control Engineer
Technical Review Unit
(916) 341-7373
12/13/13
Date



Robert Trommer, C.H.G.
Senior Engineering Geologist
Chief, Technical Review Unit
(916) 341-5684
12/13/13
Date

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The case complies with the State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the Site do not pose significant risk to human health, safety, or the environment.

The case complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<p>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST site closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If so, was the corrective action performed consistent with any order?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p><u>General Criteria</u> General criteria that must be satisfied by all candidate sites:</p> <p>Is the unauthorized release located within the service area of a public water system?</p> <p>Does the unauthorized release consist only of petroleum?</p> <p>Has the unauthorized (“primary”) release from the UST system been stopped?</p> <p>Has free product been removed to the maximum extent practicable?</p> <p>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.
http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

<p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Nuisance as defined by Water Code section 13050 does not exist at the Site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria:</p> <p>1. Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5</p> <p>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>2. Petroleum Vapor Intrusion to Indoor Air: The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p>Is the Site an active commercial petroleum fueling facility? Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>3. Direct Contact and Outdoor Air Exposure: The Site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p> <p>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?</p> <p>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

ATTACHMENT 2: SUMMARY OF BASIC CASE INFORMATION (Conceptual Site Model)

Site Location/History

- This case is located on the northwest corner of Rossmoor Parkway and Tice Valley Boulevard and is an active commercial petroleum fueling facility.
- The Site is bounded on the north and west by the Rossmoor Shopping Center parking lot, on the south by Tice Valley Boulevard and a retail store parking lot, on the southeast by the Tice Valley Boulevard and Rossmoor Parkway intersection and Tice Valley Park, and on the east by Rossmoor Parkway and a bank.
- Site map showing the location of the former UST, monitoring wells and groundwater level contours is provided at the end of this review summary report (Arcadis, September 2013).
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: April 1998.
- Status of Release: UST removed.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/Removed/Active	Date
1	1,000	Waste Oil	Removed	April 1998
2	10,000	Gasoline	Active	--
3	10,000	Gasoline	Active	--
4	10,000	Gasoline	Active	--
5	10,000	Diesel	Active	--

Receptors

- GW Basin: Ygnacio Valley Groundwater Basin.
- Beneficial Uses: Regional Water Board Basin Plan lists groundwater recharge, municipal and domestic supply.
- Land Use Designation: Aerial photograph available on GeoTracker indicates commercial land use in the vicinity of the Site.
- Public Water System: East Bay Municipal Utility District.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by the California Department of Public Health within 1,000 feet of the projected plume boundary. No other water supply wells were identified within 1,000 feet of the projected plume boundary in the files reviewed.
- Distance to Nearest Surface Water: Tice Creek is located approximately 300 feet southeast from the projected plume boundary.

Geology/Hydrogeology

- Stratigraphy: Hard, dry clayey silt or silty clay that may be representative of weathered bedrock is generally encountered beneath the surface material to the total depth explored of 70 feet below ground surface (bgs) (Arcadis, 2013).
- Maximum Sample Depth: 70 feet bgs.
- Minimum Groundwater Depth: 1.61 feet bgs at monitoring well MW-7.
- Maximum Groundwater Depth: 54.49 feet bgs at monitoring well MW-5.
- Current Average Depth to Groundwater: Approximately 5 feet bgs in the shallow zone.
- Saturated Zones(s) Studied: Approximately 2 - 60 feet bgs.

- Appropriate Screen Interval: Yes.
- Groundwater Flow Direction: South-southeast with a gradient of 0.011 feet/foot (September 2013).

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (9/24/2013)
MW-2	November 2005	4 - 20	4.03
MW-3	November 2005	4 - 20	4.83
MW-4	November 2005	4 - 20	5.53
MW-5	November 2005	50 - 60	50.13
MW-6	July 2007	5 - 20	7.25
MW-7	July 2007	4 - 15	4.76

Remediation Summary

- Free Product: None reported.
- Soil Excavation: Approximately 40 cubic yards of impacted soil were excavated and disposed offsite in 1998. Excavation was conducted to a total depth of 8.5 feet.
- In-Situ Soil/Groundwater Remediation: None reported.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs [mg/kg (date)]	Maximum 5-10 feet bgs [mg/kg (date)]
Benzene	0.48 (2/4/2008)	2.1 (1/2/2001)
Ethylbenzene	4.7 (2/4/2008)	5.6 (1/2/2001)
Naphthalene	NA	NA
PAHs	NA	NA

NA: Not Analyzed, Not Applicable or Data Not Available
 mg/kg: Milligrams per kilogram, parts per million
 PAHs: Polycyclic aromatic hydrocarbons

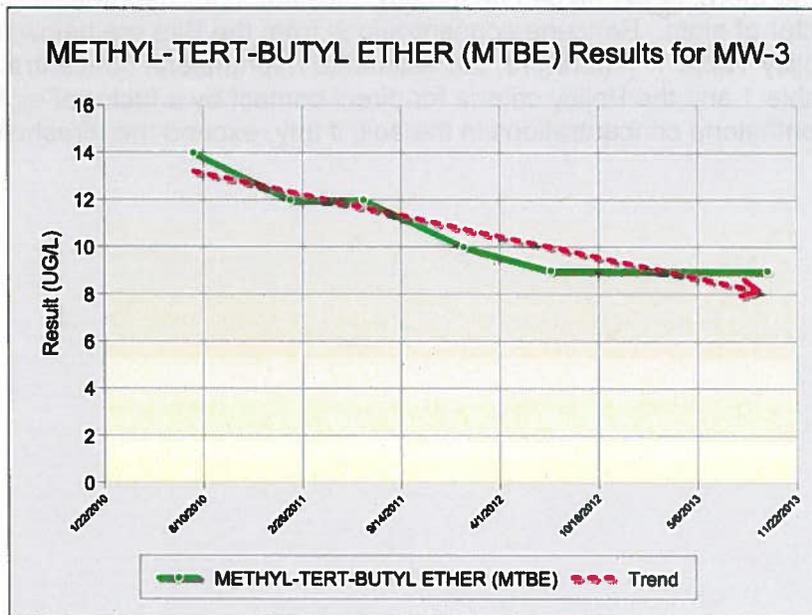
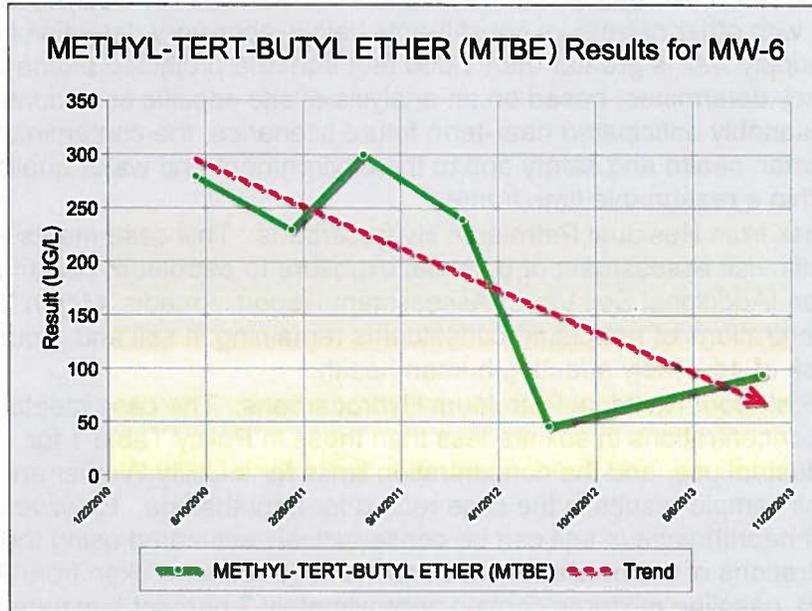
Most Recent Concentrations of Petroleum Constituents in Groundwater

Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	1,2-DCA (µg/L)
MW-2	9/24/2013	170	1	<0.5	3	<0.5	14	150	<0.5
MW-3	9/24/2013	<50	<0.5	<0.5	<0.5	<0.5	9	<2	<0.5
MW-4	9/24/2013	<50	<0.5	<0.5	<0.5	<0.5	14	26	9
MW-5	9/24/2013	<50	<0.5	<0.5	<0.5	<0.5	1	<2	<0.5
MW-6	9/24/2013	<50	<0.5	<0.5	<0.5	<0.5	95	8	<0.5
MW-7	9/24/2013	<50	<0.5	<0.5	<0.5	<0.5	0.5	<2	<0.5
WQOs		--	1	150	700	1,750	5	1,200 ^a	0.5

µg/L: Micrograms per liter, parts per billion; <: Not detected at or above stated reporting limit
 TPHg: Total petroleum hydrocarbons as gasoline; MTBE: Methyl tert-butyl ether; TBA: Tert-butyl alcohol
 WQOs: Water Quality Objectives, San Francisco Bay Regional Water Quality Control Board, Region 2 (Regional Water Board) Basin Plan
 --: Regional Water Board Basin Plan does not have a numeric water quality objective for TPHg
^a: California Department of Public Health, Response Level

Groundwater Trends

- Since 2005, six groundwater monitoring wells have been installed and irregularly monitored. MTBE trends in the downgradient wells MW-6 and MW-3 are shown below:



Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for methyl tert-butyl ether (MTBE): Yes, see table above.
- Oxygen Concentrations in Soil Vapor: None reported.
- Plume Length: Projected to be less than 1,000 feet long.
- Plume Stable or Decreasing: Yes.

- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 1 by Class 5. Although Tice Creek is located approximately 300 feet southeast from the projected MTBE plume boundary, the concentrations are low and decreasing. Monitoring well MW-3 located between the source of release and the creek has consistently shown low MTBE concentrations, with other petroleum constituents below laboratory detection limits. The nearest water supply well is greater than 1,000 feet from the projected plume boundary. The regulatory agency determines, based on an analysis of site specific conditions, which under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable time frame.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: This case meets Policy Criterion 2b. A site-specific risk assessment of potential exposure to petroleum constituents as a result of vapor intrusion [Additional Soil Vapor Assessment Report, Arcadis, March 2013] found that maximum concentrations of petroleum constituents remaining in soil and groundwater will have no significant risk of adversely affecting human health.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: 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 directly substituted 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.

