

State Water Resources Control Board

October 14, 2016

55 Howe Road Investors, LLC
Attention: Mr. Edward Pike
3470 Mount Diablo Boulevard, Suite A-205
Lafayette, CA 94549
[Via email only] (NPike@npike.com)

Dear Mr. Pike:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,
55 HOWE ROAD INVESTORS, 55 HOWE ROAD, MARTINEZ, CONTRA COSTA COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T10000007220
- San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board), Case No. 07-0902

State Water Board staff reviewed the closure request dated March 23, 2016, and the response from the San Francisco Bay Water Board dated May 23, 2016. After careful consideration of the GeoTracker record, State Water Board staff agrees with the San Francisco Bay Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criteria:

- **Groundwater Media-Specific Criteria**
- **Direct Contact and Outdoor Air Exposure Criteria**

There are significant amounts of petroleum constituents in groundwater at the site. Petroleum constituents, specifically benzene, have been detected in monitoring well MW-4 at high concentrations. Monitoring well MW-4 is located in the suspected source area of the site. During the most recent groundwater sampling event in June 2016, benzene was detected at 20,000 micrograms per liter ($\mu\text{g/L}$), which increased from 6,200 $\mu\text{g/L}$ as reported in the December 2015 groundwater sampling event. The contaminant plume that exceeds water quality objectives is estimated to be 350 feet in length. The nearest surface water body, Peyton Creek, is located approximately 20 feet from the site boundary and a few feet from the defined plume

boundary. Peyton Creek flows towards the north and runs along the east side of the property boundary. The groundwater flow direction at the site is toward the northeast. Given the high concentration of benzene in groundwater, the contaminant plume length, and the proximity of Peyton Creek, site conditions do not meet any of the Groundwater Media-Specific Criteria specified in the Policy.

During the sampling event in January 2016, ethylbenzene and naphthalene were detected at 130 milligrams per kilogram (mg/kg) and 89 mg/kg, respectively, in a soil sample collected at two feet below ground surface. These detections exceeded the Commercial/Industrial thresholds of 89 mg/kg and 45 mg/kg, respectively, for Direct Contact and Outdoor Air Exposure Media-Specific Criteria specified in Table 1 of the Policy.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact Mr. George Lockwood at (916) 341-5752 or George.Lockwood@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Karen Larsen". The signature is fluid and cursive, with the first name "Karen" and last name "Larsen" clearly legible.

Karen Larsen, Deputy Director
Division of Water Quality

cc: [Via email only]

Mr. Bruce H. Wolfe, Executive Officer
San Francisco Bay Water Board
(Bruce.Wolfe@waterboards.ca.gov)

Ms. Dyan Whyte
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(Dyan.Whyte@waterboards.ca.gov)

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Ms. Laurent Meillier
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cc: Continued next page

cc: (Continued)

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Ms. Therese Barakatt
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Ms. Kristen Duey
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