

State Water Resources Control Board

August 25, 2014

Mr. Marvin Katz
Shell Oil Products US
20945 South Wilmington Avenue
Carson, CA 90810
(via email Marvin.Katz@shell.com)

Dear Mr. Katz:

**CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK
CASE, FORMER SHELL STATION, 4695 THORNTON AVENUE, FREMONT,
ALAMEDA 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.

The subject site has the following identification numbers:

- GeoTracker No. T0600101264
- San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board) Case No. 01-1369
- Alameda County Water District (ACWD) Case No. TT0100

The State Water Board reviewed the closure request dated January 7, 2013 and responses from the San Francisco Bay Water Board and the ACWD in the GeoTracker record. Water Board and ACWD staff disagrees with the proposed UST case closure because General and Media-Specific Criteria have not been met.

After careful consideration of the GeoTracker record, I have determined that this site does not meet the following General and Media-Specific Criteria: General Criteria e - A conceptual site model that assesses the nature, extent, and mobility of the release has been developed; Groundwater Media-Specific Criteria 4.d - The dissolved concentration of methyl tertiary butyl ether (MTBE) is less than 1,000 micrograms per liter ($\mu\text{g/l}$); or Petroleum Vapor Intrusion to Indoor Air Media-Specific Criteria Scenario 3.a - Where a continuous bioattenuation zone that provides a separation of at least 5 feet vertically between the dissolved phase benzene and the foundation of an existing building exists, concentrations of Total Petroleum Hydrocarbons (TPH) as gasoline and TPH as diesel combined are less than 100 milligram per kilogram throughout the entire depth of the bioattenuation zone.

There is a significant amount of petroleum constituents in groundwater near the secondary source. During October 2003, MTBE concentrations in groundwater monitoring wells S-1 and S-2 were reported at 7,300 µg/L, and 4,000 µg/L, respectively. Monitoring wells S-1 and S-2 were destroyed in January 2004 during limited over-excavation activities. The nature, extent, and mobility of dissolved concentrations of MTBE beneath the site cannot be characterized at this time. Shallow soil near the existing commercial building has not been assessed.

Petroleum constituents in soil and groundwater continue to pose a threat to human health, safety and the environment. Criteria for low-threat UST case closure have not been met at this time, and therefore, closure of the UST case is not appropriate.

If you have any questions, please contact Mr. Benjamin Heningburg at (916) 341-5749 or benjamin.heningburg@waterboards.ca.gov

Sincerely,


Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: [via email only]

Mr. Bruce H. Wolfe, Executive Officer
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