State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
PRELIMINARY REVIEW – AUGUST 2015

Agency Information

Agency Name: Alameda County Water District (ACWD)	Address: 43885 South Grimmer Blvd. Fremont, CA 94538
Agency Caseworker: Doug Young	Case No.: TT0005

Agency Name: San Francisco Bay Regional Water Quality Control Board (Regional Water Board)	Address: 1515 Clay Street, Suite 1400 Oakland, CA 94612
Agency Caseworker: Barbara Sieminski	Case No.: 01-0592

Case Information

USTCF Claim No.: 1292	GeoTracker Global ID: T0600100545
Site Name: Exxon #7-3599	Site Address: 39990 Fremont Boulevard Fremont, CA 94539
Responsible Party: Exxon Mobil Corp. Attn: Tina Ferrera	Address: PNC Bank, Lock Box 676443 Dallas, TX 75267
USTCF Expenditures to Date: $0	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=T0600100545

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 release was reported in June 1985 following an inventory loss report. Four USTs (three gasoline, one waste oil) were removed in May 1986 and approximately 400 cubic yards of contaminated soil were excavated. Groundwater extraction began in 1994, soil vapor extraction began in 1995, and in 2004 the systems were converted to dual phase extraction (DPE). DPE was conducted intermittently between April 2004 and January 2013. In all, 14,825 pounds of total petroleum hydrocarbons as gasoline (TPHg) and 9.8 million gallons of groundwater were removed by the remediation systems. Active remediation has not been conducted for the past two years. Since 1985, 12 groundwater and nine remediation monitoring wells have been installed and monitored; one well has been abandoned. According to groundwater data, water quality objectives have been achieved or nearly 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 250 feet of the defined plume boundary. No other water supply wells have been identified within 250 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 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 because the stability of the groundwater plume is unknown.
- Vapor Intrusion to Indoor Air: This active fueling facility meets the Active Commercial Petroleum Fueling Facility Exception. Exposure to petroleum vapors associated with historical fuel system releases is comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities.
- Direct Contact and Outdoor Air Exposure: This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from potential exposure to residual soil contamination was completed by Fund staff. The results of the assessment found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. The Site is paved and accidental exposure to site soils is prevented. Therefore, the pathway is incomplete. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.

Objections to Closure and Responses

According to the LTCP Checklist page in GeoTracker dated June 12, 2015, ACWD staff objects to UST case closure because:

- Inadequate conceptual site model.
  RESPONSE: Adequate data is available in GeoTracker to develop a conceptual site model as defined by the Policy.
- Secondary source remains.
  RESPONSE: Secondary source as defined by the Policy has been removed by active remediation.
- The case does not meet Policy Groundwater criteria.
  RESPONSE: We concur; the case does not meet Policy criteria because the stability of the groundwater plume is unknown.

Exxon #7-3599
39990 Fremont Boulevard, Fremont
Claim No: 1292

Recommendation
In an email dated June 28, 2015, ACWD staff requested additional groundwater monitoring with an emphasis on well MW-9 to establish post remediation groundwater trends. We concur with the County staff to conduct post remediation monitoring.

8/6/15
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