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## State Water Resources Control Board

April 11, 2016

Ms. E. Kelly Harrison  
DG Strategic II, LLC  
Dynamic Development Company, LLC  
1725 21<sup>st</sup> Street  
Santa Monica, CA 90404

Dear Ms. Harrison:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,  
DOLLAR GENERAL STORE # 13336, 308 SOUTH IMPERIAL AVENUE, IMPERIAL,  
IMPERIAL 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. T10000005192
- Colorado River Basin Regional Water Quality Control Board (Colorado River Basin Water Board), Case No. 7T2251022

State Water Board staff reviewed the closure request dated December 23, 2015 and the response from the Colorado River Basin Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Colorado River Basin Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, the State Water Board finds that the subject case does not meet the following Policy criteria:

- **Groundwater Media-Specific Criteria**
- **Petroleum Vapor Intrusion to Indoor Air Media-Specific Criteria**

The projected groundwater plume length is greater than 100 feet and the plume has not been demonstrated to be stable or decreasing. Grab groundwater samples collected in the source area in September 2015 indicate benzene is present in groundwater at a maximum concentration of 5,700 µg/L. One soil vapor sample collected in December 2015 exceeded Policy limits with a benzene concentration of 3,400 µg/m<sup>3</sup> and oxygen measured at 3.2%.

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](mailto:George.Lockwood@waterboards.ca.gov).

Sincerely,



Karen Larsen, Deputy Director  
Division of Water Quality

cc: [Via email only]

Mr. Jose Angel  
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Ms. Rosalyn Fleming  
Colorado River Basin Regional Water Quality Control Board  
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Mr. Tom Vandenberg  
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