

## State Water Resources Control Board

**DRAFT**  
**REVIEW SUMMARY REPORT – ADDITIONAL WORK**  
**PRELIMINARY REVIEW – SEPTEMBER 2014**

### Agency Information

Agency Name: San Francisco Bay Regional Water Quality Control Board (Regional Water Board)	Address: 1515 Clay Street Oakland, CA 94612
Agency Caseworker: Martin Musonge	Case No.: 07-0039

### Case Information

USTCF Claim No.: 5746	GeoTracker Global ID: T0601300038
Site Name: BP #11153	Site Address: 2298 Appian Way Pinole, CA 94564
Responsible Party: Atlantic Richfield Company Attn: Charles Carneo	Address: PO Box 94583 San Ramon, CA 94583
USTCF Expenditures to Date: \$198,164	Number of Years Case Open: 28

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=T0601300038](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0601300038)

### 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 July 1986. Reportedly, 23 gallons of free product were removed from the subsurface between April 1993 and December 2006. No additional active remediation has been conducted. Since 1987, seven groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have not been 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 impacted 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 does not meet all eight Policy general criteria because free product remains in site wells.
- Groundwater Specific Criteria: The case does not meet Policy criteria because the free product remains in site wells.
- Vapor Intrusion to Indoor Air: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk.
- 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 used as a surrogate 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

According to the Path to Closure page in GeoTracker, finalized on June 26, 2014, the Regional Water Board objects to UST case closure because:

- Free product remains.  
RESPONSE: We concur
- Inadequate conceptual site model.  
RESPONSE: Adequate data is available in GeoTracker to develop a conceptual site model as defined by the Policy.
- The case does not meet Policy groundwater criteria.  
RESPONSE: We concur.

### Recommendation

The Fund concurs with the Regional Water Board August 13, 2014 letter approval of the proposed free product bail-down and vacuum extraction tests.

  
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9/18/14  
Date

  
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9/19/14  
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