

State Water Resources Control Board

**REVIEW SUMMARY REPORT – ADDITIONAL WORK
FOURTH REVIEW – OCTOBER 2015**

Agency Information

Agency Name: Santa Clara County Environmental Health Department (County)	Address: 1555 Berger Drive, Suite 300 San Jose, CA 95112
Agency Caseworker: Gerald O'Regan	Case No.: 07S1E21K02f

Case Information

USTCF Claim No.: 3567	GeoTracker Global ID: T0608500677
Site Name: George Figone Trust	Site Address: 1970 Monterey Road San Jose, CA 95112
Responsible Party: George Figone Exemption Trust Attn: Diann Ryan	Address: Private Address
USTCF Expenditures to Date: \$1,249,542	Number of Years Case Open: 24

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=T0608500677

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 Site is an active recycling business and commercial warehouse. An unauthorized release was reported in February 1991 following the removal of two gasoline USTs in January 1991. Approximately 50 tons of impacted soil was removed in the UST source area in 1999. Soil vapor extraction was conducted between June 1996 and September 2001, which reportedly removed 6,509 pounds of total petroleum hydrocarbons as gasoline (TPHg). Air sparging was conducted between July 1998 and September 2001. Groundwater extraction was conducted between February 1999 and August 2003, when the system was expanded to dual phase extraction (DPE). At the end of the DPE operation in May 2005, a total of approximately 1.5 million gallons of contaminated groundwater was removed. Batch dual phase extraction was intermittently conducted between March 2015 and June 2015, which removed 977 gallons of hydrocarbons and 72,069 gallons of contaminated groundwater. Since 1992, 16 groundwater monitoring wells have been installed and monitored; one well has been abandoned. According to groundwater data, water quality objectives have not been achieved and free product remains in site wells.

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 1,000 feet of the defined plume boundary. No other water supply wells have been identified within 1,000 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 groundwater is not

currently being used as a source of drinking water, and it is highly unlikely that the affected 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; need to determine that free product has been removed to the maximum extent practicable.
- **Groundwater Specific Criteria:** The case does not meet Policy because whether free product has been removed to the maximum extent practicable needs to be determined.
- **Vapor Intrusion to Indoor Air:** The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The onsite building is a recycling facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building.
- **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. Approximately 50 tons of impacted soil were excavated in 1999. Soil vapor extraction was conducted between June 1996 and September 2001, which reportedly removed 6,509 pounds of TPHg. Air sparging was conducted between July 1998 and September 2001. Groundwater extraction was conducted between February 1999 and August 2003, when the system was expanded to DPE. At the end of the DPE operation in May 2005, a total of approximately 1.5 million gallons of contaminated groundwater was removed. Dual phase extraction was conducted between January 2004 and May 2005. Batch dual phase extraction was intermittently conducted between March 2015 and June 2015, which removed 977 gallons of hydrocarbons and 872,069 gallons of contaminated groundwater. 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 October 1, 2014, the County opposes 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 was removed by excavation and active remediation.
- The case does not meet Policy groundwater criteria.

RESPONSE: We concur. The case does not meet Policy because whether free product has been removed to the maximum extent practicable is yet determined.

- The case does not meet Policy vapor criteria.

RESPONSE: The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The onsite building is a recycling facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building.

- The case does not meet Policy direct contact criteria.

RESPONSE: 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. Approximately 50 cubic yards of impacted soil were excavated in 1999. Soil vapor extraction was conducted between June 1996 and September 2001, which reportedly removed 6,509 pounds of TPHg. Air sparging was conducted between July 1998 and September 2001. Groundwater extraction was conducted between February 1999 and August 2003, when the system was expanded to DPE. At the end of the DPE operation in May 2005, a total of approximately 1.5 million gallons of contaminated groundwater was removed. Batch dual phase extraction was intermittently conducted between March 2015 and June 2015, which removed 977 gallons of hydrocarbons and 872,069 gallons of contaminated groundwater. 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.

Recommendation

Free product was last measured in well MW-1 in March 2015. Dual phase extraction was conducted between March 2015 and June 2015. The State Water Board staff recommends one additional round of groundwater monitoring to determine if free product has been removed to the maximum extent practicable and whether the groundwater plume in the source area continues to decrease.



Kirk Larson, P.G. 10/19/15
Engineering Geologist Date
Technical Review Unit
(916) 341-5663



Pat G. Cullen, P.G. 10/19/15
Senior Engineering Geologist Date
Chief, Technical Review Unit
(916) 341-5684

