

## State Water Resources Control Board

March 3, 2015

Ms. Andrea Wing  
Shell Oil Products US  
209 S. Wilmington Ave.  
Carson, CA 90810  
[Via email only] ([Andrea.Wing@Shell.com](mailto:Andrea.Wing@Shell.com))

Dear Ms. Wing:

**CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, FORMER SHELL STATION, 1129 MISSION STREET, SANTA CRUZ, SANTA CRUZ 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:

- State Water Board, GeoTracker No. T0608700147
- Santa Cruz Environmental Health Department (County of Santa Cruz), Case No. RO0000225
- Central Coast Regional Water Quality Control Board (Central Coast Water Board), Case No. 2876

The State Water Board reviewed the closure request dated August 1, 2013. A closure denial review and subsequent draft denial letter was prepared by the UST Cleanup Fund. The case was transferred to the Division of Water Quality during December of 2014 based on a claim rejection.

After careful consideration of the GeoTracker record, State Water Board staff agrees with County of Santa Cruz staff and Central Coast Water Board staff determinations that all of the General and Media-Specific Criteria have not been met. Based on information in the above-referenced case file, this agency finds 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.
- Vapor Intrusion Media-Specific Criteria, Scenario 4 (2 of 2) - Where there is a minimum of five vertical feet of soil between the soil vapor measurement and the foundation of an existing building or ground surface of future construction, total petroleum hydrocarbons (TPH) as gasoline and TPH as diesel (total TPH) is less than 100 milligrams per kilogram (mg/kg) measured in at least two depths of the five foot zone, and oxygen is greater than or equal to four percent measured at the bottom of the five foot zone.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

During 2011, concentrations of benzene in soil vapor samples SVW-5A and SVW-5B ranged between 130,000 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) and 60,000  $\mu\text{g}/\text{m}^3$ . There is insufficient soil data to determine concentrations of total TPH in the bioattenuation zone near the commercial building and samples SVW-5A and SVW-5B. The percentage of oxygen in soil vapor samples SVW-5A and SVW-5B ranged between 1.5 percent and 1.0 percent. Oxygen in shallow soil measured in this area does not satisfy the requirements for a five foot bioattenuation zone. The extent and mobility of petroleum hydrocarbons in soil near the bottom of the commercial building foundation cannot be determined with the existing data.

Petroleum constituents in soil vapor 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](mailto:Benjamin.Heningburg@waterboards.ca.gov).

Sincerely,



Victoria A. Whitney, Deputy Director  
Division of Water Quality

cc: [Via email only]

Mr. Kenneth A. Harris, Jr., Executive Officer  
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Mr. Michael Thomas, Assistant Executive Officer  
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