

**State Water Resources Control Board**

**REVIEW SUMMARY REPORT – ADDITIONAL WORK  
THIRD REVIEW – APRIL 2016**

**Agency Information**

Agency Name: North Coast Regional Water Quality Control Board (Regional Water Board)	Address: 5550 Skylane Blvd, Suite A Santa Rosa, CA 95403
Agency Caseworker: Dave Parson	Case No.: 1TSO224

**Case Information**

Cleanup Fund (Fund) Claim No.: 726	GeoTracker Global ID: T0609700169
Site Name: Dave’s Texaco (Former)	Site Address: 7200 Healdsburg Avenue Sebastopol, CA 95472
Responsible Party: David & Susan Zedrick	Address: P.O. Box 7010 Santa Rosa, CA 95407
Fund Expenditures to Date: \$1,495,000	Number of Years Case Open: 27
Current Fund Budget Category: Claim Closed	

To view all public documents for this case available on GeoTracker use the following URL:  
[https://geotracker.waterboards.ca.gov/regulators/screens/menu.asp?global\\_id=T0609700169](https://geotracker.waterboards.ca.gov/regulators/screens/menu.asp?global_id=T0609700169)

**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 November 1988. In December 1988, five (three gasoline, one diesel, and one kerosene) USTs were removed and replaced with five new USTs in different locations on the site. There is no record of excavation of fuel-impacted soils at the time of the UST replacement activities. A soil vapor extraction (SVE) system operated at the site from 1992 to 1993, removing 18,709 pounds of petroleum hydrocarbons. A reported mass of 100 pounds of free product was hand-bailed from groundwater monitoring well MW-4S between 1995 and 1999. An air sparging-enhanced SVE (AS/SVE) system operated from 2002 to 2011, removing an additional 41,909 pounds. Active remediation has not been conducted at the Site for the past five years. Since 1988, 15 monitoring or remediation wells have been installed and irregularly monitored. According to groundwater data, water quality objectives (WQOs) have been achieved or nearly achieved for all constituents except for methyl tertiary butyl ether (MTBE) in wells located offsite.

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 meets all eight Policy general criteria.
- **Groundwater Specific Criteria:** The case does not meet Policy Criterion 1. The contaminant plume that exceeds water quality objectives is greater than 100 feet in length, the dissolved concentration of MTBE is greater than 1,000 µg/L, and the plume has not been fully defined to the east (downgradient).
- **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. The off-site properties associated with the case meet Policy Criterion 2a by Scenario 3b. The maximum benzene concentration in groundwater is less than 1,000 micrograms per liter (µg/L). The minimum depth to groundwater is greater than 10 feet, overlain by soil containing less than 100 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons (TPH).
- **Direct Contact and Outdoor Air Exposure:** This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, an evaluation of site-specific risk from potential exposure to residual soil contamination was completed by State Water Board 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. A soil vapor extraction system operated between 1992 and 1993, and an AS/SVE operated between 2002 and 2011, removing a combined mass of 59,988 pounds of petroleum hydrocarbons before reaching the practical extent of soil remediation. Additionally, because the site is an active commercial fueling facility, any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The local Building Department would be notified as part of the closure process and the potential presence of residual contamination should be taken into account when issuing and executing excavation, 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 in GeoTracker, last updated on February 22, 2016 by Sonoma County Environmental Health (County) staff, objects to UST case closure because:

- **Comment:** A conceptual site model (CSM) that assesses the nature, extent, and mobility of the release has not been developed.  
**Response:** There is sufficient site-specific information to evaluate the threat to human health, safety, and the environment, therefore a CSM that assesses the nature, extent, and mobility of the release has been developed. The goal of a CSM is to provide sufficient site-specific information to evaluate the threat to human health, safety, and the environment. The supporting data and analysis used to develop the CSM are not required to be contained in a single report. The information may be contained in multiple reports submitted to the regulatory agency over a period of time.
- **Comment:** The case does not meet the Policy groundwater criterion.  
**Response:** State Water Board staff agree. The dissolved MTBE plume needs to be defined to WQOs to the east (downgradient) of monitoring well MW-13.

**Outcome of Agency Communication**

In a teleconference on March 22, 2016 between County staff and State Water Board staff, it was agreed that the County would direct the Responsible Party (RP) to:

1. Update and submit a revised monitoring plan to address only the wells with detections of MTBE.
2. Provide a work plan to destroy monitoring wells and associated remedial infrastructure not associated with MTBE delineation/characterization.
3. Prepare a work plan to delineate MTBE offsite, proposing a minimum of two monitoring wells, set at least 500 feet in the anticipated downgradient direction. Locations and depths of wells shall be determined by reviewing historic groundwater flow direction and data from other investigations in the vicinity.

Subsequent to the teleconference, the County transferred the case to the Regional Water Board. Regional Water Board staff issued a directive letter on April 13, 2016 in which they directed the RP only to complete Item No. 3 above. State Water Board staff recommend Regional Water Board staff further direct the RP to complete Items No. 1 and 2 above. State Water Board staff also recommend that, once the MTBE plume is defined to WQOs, Regional Water Board staff reevaluate the case with respect to Policy criteria.

  
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