REVIEW SUMMARY REPORT – ADDITIONAL WORK
PRELIMINARY REVIEW – JULY 2015

Agency Information

Agency Name: Santa Clara County Environmental Health Department (County)	Address: 1555 Berger Drive, Suite 300 San Jose, CA 95112
Agency Caseworker: Lani Lee	Case No.: 09S3E28Q01f

Case Information

USTCF Claim No.: 7329	GeoTracker Global ID: T0608578682
Site Name: Sabek Gas Station	Site Address: 16270 Monterey Road Morgan Hill, CA 95037
Responsible Party: Robert & Frances Cava	Address: Private Address
Responsible Party: Sabek, Inc. Attn: Andy Saberi	Address: 1045 Airport Boulevard South San Francisco, CA 94080
USTCF Expenditures to Date: $130,690	Number of Years Case Open: 27

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=T0608578682

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 currently an office building and paved parking area and a former commercial petroleum fueling facility. An unauthorized release was reported in January 1988 following an environmental investigation. Two gasoline USTs were removed in May 1991 and approximately 440 cubic yards of contaminated soil was excavated to a depth of 13 feet below ground surface (bgs). Approximately 274 tons of contaminated soil was excavated in 2003. Ozone sparging was conducted between September 2006 and March 2011. Soil vapor extraction was conducted between October 2014 and January 2015, which removed approximately 1,410 pounds of total petroleum hydrocarbons as gasoline (TPHg). Reportedly, 125 pound of oxygen releasing compound (ORC) was placed in EW-1 and 10 pounds of ORC was placed in MW-5 in 1998. Since 1998, 33 groundwater monitoring wells have been installed and monitored; 12 wells have been abandoned. According to groundwater data, water quality objectives have been achieved or nearly achieved except at an offsite location north northwest (downgradient) of the Site.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells within 1,000 feet of the projected plume boundary. No other water supply wells have been identified within 1,000 feet of the projected plume boundary in files reviewed. There is a creek located 500 feet southwest and upgradient of the Site. 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 the affected shallow 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 criteria because the contaminant plume that exceeds water quality objectives is greater than 100 feet in length, while the maximum dissolved concentration of benzene is greater than 3,000 micrograms per liter (µg/L). In addition, there is a creek located 500 feet southwest and upgradient of the Site.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2a by Scenario 1. There are high concentrations of petroleum hydrocarbons in the groundwater. The minimum depth to groundwater beneath the foundation of existing or potential buildings is greater than 30 feet, overlain by soil containing less than 100 milligrams per kilogram (mg/kg) of 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, 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 440 cubic yards of contaminated soil was excavated to a depth of 13 feet bgs in 1991. Approximately 274 tons of contaminated soil was excavated in 2003. 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 Path to Closure page in GeoTracker dated August 29, 2014, the County staff objects to UST case closure because:

- 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 criteria because the contaminant plume that exceeds water quality objectives is greater than 100 feet in length, while the maximum dissolved concentration of benzene is greater than 3,000 µg/L. In addition, there is a creek located 500 feet southwest and upgradient of the Site.

Sabek Gas Station
16270 Monterey Road, Morgan Hill
Claim No: 7329

Recommendation
In a meeting dated March 27, 2015, it was proposed that soil confirmation sampling to be conducted to determine if the soil vapor extraction has reduced remaining subsurface contamination to meet the Policy criteria. Due to the decreasing level of the groundwater, several monitoring wells have been dry, and the soil confirmation sampling results may be used to evaluate whether the case may be closed. The State Water Board staff agrees with the proposed work.

7/7/15

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7/7/15

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