

State Water Resources Control Board

REVIEW SUMMARY REPORT – CONCUR FOURTH REVIEW – AUGUST 2016

Agency Information

Agency Name: North Coast Regional Water Quality Control Board (Regional Water Board)	Address: 5550 Skylane Boulevard, Suite A Santa Rosa, CA 95403
Agency Caseworker: Ms. Jo Bentz	Case No.: 1TMC163

Case Information

Cleanup Fund (Fund) Claim No.: 1711	GeoTracker Global ID: T0604500142
Site Name: BP, Philo	Site Address: 8500 Highway 128 Philo, CA 95466 (Site)
Responsible Party: Mr. Arthur Hatcher	Address: P.O. Box 201 Boonville, CA 95415
Fund Expenditures to Date: \$504,863	Number of Years Case Open: 25
Current Fund Budget Category: SC – Site Closure	

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=T0604500142

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; however, the Regional Water Board has determined that the case can be closed pending favorable results of verification monitoring. Highlights of the case follow:

This case is an active commercial petroleum fueling and auto repair facility. An unauthorized release was reported in July 1991. Three gasoline USTs were removed in November 1998. During UST removal activities, between 180 and 270 cubic yards of impacted soil were reportedly excavated, aerated, and used as backfill. Active remediation has not been conducted at the site for the past 17 years. Since 2001, fifteen groundwater monitoring wells have been installed and irregularly monitored. According to groundwater data, water quality objectives have been achieved for all constituents in Site monitoring wells; however, domestic water supply wells located on adjacent properties to the east and south of the site have been impacted by methyl tertiary butyl ether (MTBE). Replacement supply wells have been installed on both properties to mitigate the threat to drinking water on those properties.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there is a shallow drainage channel that has been identified as a creek within 250 feet of the site. There are three domestic supply wells located within 250 feet of the site. A fourth domestic supply well is located between 250 and 1,000 feet of the site. Domestic supply wells are located at 8550 Highway 128, 18051 Rays Road (two wells), and 8600 Highway 128. The

domestic well located at 8550 Highway 128 to the east (downgradient) was replaced in February 2012. The old well was disconnected from the onsite residence, but has not been abandoned. The domestic drinking water supply well located at 18051 Rays Road to the south (crossgradient) was abandoned in 2015 and a replacement supply well installed in February. A second domestic supply well on this property remains, but is not used to supply drinking water. The well at 8600 Highway 128 located farther to the east has not had detections of petroleum constituents above laboratory reporting limits. The unauthorized release is not located within the service area of a public water system, as defined in the Policy. The affected shallow groundwater is currently being used as a source of drinking water. 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 seven of eight Policy general criteria. The unauthorized release is not located within the service area of a public water system.
- **Groundwater Specific Criteria:** The case does not meet the Policy Criterion for groundwater because the nearest water supply well is less than 250 feet from the plume boundary.
- **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.
- **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 evaluation of site-specific risk from potential exposure to residual soil contamination was completed by State Water Board staff. The results of the evaluation found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. During UST removal activities in 1998, between 180 and 270 cubic yards of impacted soil were reportedly excavated, aerated, and used as backfill. Although there is no shallow soil data available in GeoTracker, the lack of detectable dissolved concentrations of benzene and ethylbenzene in groundwater which is encountered at depths between zero and nine feet below ground surface indicates remaining petroleum constituents in soil are sufficiently low to meet this criterion.

Recommendation

Regional Water Board staff issued a pre-closure notification for the case in 2013 in order to initiate the closure process following installation of the replacement drinking water supply well at 8550 Highway 128. The owner of the property at 18051 Rays Road objected to the case closure and requested that water samples be collected from their drinking water supply well. MTBE was detected and the closure process was suspended while the drinking water supply well on that property was replaced. In a teleconference with State Water Board staff on July 28, 2016, Regional Water Board staff indicated their intention to resume the closure process upon favorable results of verification monitoring of the replacement drinking water supply well at 18051 Rays Road. Verification monitoring is scheduled to occur quarterly through the first quarter of 2017. State Water Board staff concur with verification monitoring and Regional Water Board staff's plan to reinitiate the closure process pending favorable results.

BP, Philo
8500 Highway 128, Philo,
Claim No: 1711

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In addition, State Water Board staff recommend that Regional Water Board staff also provide notice to the owners of the properties at 8550 Highway 128 and 18051 Rays Road that wells remaining on their property not be used for drinking water purposes other than the new drinking water wells that have been installed and connected to their residences.

The recommended Fund budget category for this claim is: VM – Verification Monitoring.

 8/10/16

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Date

 8/10/16

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