

State Water Resources Control Board

November 6, 2015

DG Strategic II, LLC
c/o Ms. Kelly Harrison
Dynamic Design Build Inc.
1725 21st Street
Santa Monica, CA 90404
[Via email only] (kharrison@dynamicdevco.com)

Dear Ms. Harrison:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,
DOLLAR GENERAL STORE #13336, 308 SOUTH IMPERIAL AVENUE, IMPERIAL,
IMPERIAL 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 (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T10000005192
- Colorado River Basin Regional Water Quality Control Board (Colorado River Basin Water Board), Case No. 7T2251022

State Water Board staff reviewed the closure request dated April 24, 2015 and the response from the Colorado River Basin Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Colorado River Basin Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, this agency finds that the subject case does not meet the following Policy criteria:

- **General Criterion e.** – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.
- **Petroleum Vapor Intrusion to Indoor Air Media-Specific Criteria**

There is insufficient data to determine the potential risk of petroleum vapor intrusion to indoor air for the planned commercial building. A soil vapor sample collected near the former USTs and within the footprint of the planned commercial building in 2014 exceeded Policy thresholds with a benzene concentration of 4,600 µg/m³ and no oxygen concentration reported. Additionally, the extent of soil contamination in the vicinity of the former USTs has not been adequately characterized.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact Mr. George Lockwood at (916) 341-5752 or George.Lockwood@waterboards.ca.gov.

Sincerely,


Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: [Via email only]

Mr. Robert Perdue, Executive Officer
Colorado River Basin Water Board
(Robert.Perdue@waterboards.ca.gov)

Mr. Jose Angel
Colorado River Basin Water Board
(Jose.Angel@waterboards.ca.gov)

Ms. Mary Serra
Colorado River Basin Water Board
(Mary.Serra@waterboards.ca.gov)

Mr. John Carmona
Colorado River Basin Water Board
(John.Carmona@waterboards.ca.gov)

Ms. Rosalyn Fleming
Colorado River Basin Water Board
(Rosalyn.Fleming@waterboards.ca.gov)

Mr. Tom Vandenberg
State Water Board
(Tom.Vandenberg@waterboards.ca.gov)

Ms. Therese Barakatt
State Water Board
(Therese.Barakatt@waterboards.ca.gov)

Mr. George Lockwood
State Water Board
(George.Lockwood@waterboards.ca.gov)

cc: Continued next page

cc: (Continued)

Mr. Brian Brennan
EEI Geotechnical & Environmental Solutions
(bbrennan@eetiger.com)

Mr. Michael Harris
Redhorse Corporation
(Michael.Harris@redhorsecorp.com)