

## State Water Resources Control Board

October 21, 2014

Mr. Robert Saur  
Pacific Gas and Electric Company  
Remediation Project Manager  
3401 Crow Canyon Road  
San Ramon, CA 94583

Dear Mr. Saur:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, PG&E FACILITY, 5555 FLORIN-PERKINS ROAD, SACRAMENTO, SACRAMENTO 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:

- GeoTracker No. T0606797752
- Central Valley Regional Water Quality Control Board (Central Valley Regional Water Board) Case No. 341389
- County of Sacramento Environmental Management Department (County of Sacramento) Case No. G017/RO0001506

The State Water Board reviewed the closure request dated March 6, 2014 and response from the County of Sacramento. After careful consideration of the GeoTracker record, Water Board staff disagrees with the proposed UST case closure because all of the General 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.

There is a significant amount of petroleum constituents in groundwater downgradient of the site. During 2013 and 2014 concentrations of 1,2-dichloroethane (1,2-DCA) in onsite well MW-10-105 ranged between 20 micrograms per liter ( $\mu\text{g/l}$ ) and 14  $\mu\text{g/l}$ . There is insufficient groundwater data to assess the petroleum contaminant plume between 80 and 105 feet below grade surface to the south and southeast of well MW-10-105.

Groundwater monitoring wells 15 and 16, monitored by L and D Landfill Limited Partnership, are located over 1,300 feet downgradient of well MW-10-105. Based on the demonstrated variability of subsurface conditions and groundwater flow direction within 300 feet of the site, it is highly unlikely that groundwater contaminant data collected from these wells are sufficient to characterize the extent of the petroleum contaminant plume downgradient of the site. The extent and mobility of 1,2-DCA in groundwater, downgradient of well MW-10-105, cannot be determined with the existing data.

Petroleum constituents in groundwater 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:

Ms. Kathleen Isaacson  
WAU & Company  
400 Montgomery Street  
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[Via email only]

Ms. Pamela Creedon, Executive Officer  
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