

State Water Resources Control Board

DRAFT
REVIEW SUMMARY REPORT – ADDITIONAL WORK
THIRD REVIEW – NOVEMBER 2014

Agency Information

Agency Name: Central Coast Regional Water Quality Control Board (Regional Water Board)	Address: 895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401
Agency Caseworker: Wei Liu	Case No.: 3557

Case Information

USTCF Claim No.: 1296	GeoTracker Global ID: T0607900001
Site Name: Chevron/Former BP	Site Address: 701 Las Tablas Road Templeton, CA 93465
Responsible Party: Sukhbir Singh	Address: Private Address
USTCF Expenditures to Date: \$1,130,430	Number of Years Case Open: 26

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=T0607900001

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 December 1987. Four gasoline USTs were removed and approximately 304 tons of impacted soil were excavated and disposed offsite in November 1998. Soil vapor extraction and air sparging were conducted intermittently between December 1997 and September 2003, which reportedly removed 18,508 pounds of total petroleum hydrocarbons as gasoline (TPHg). Groundwater extraction was conducted intermittently between 2007 through December 2009. Active remediation has not been conducted at the Site for the past four years. Since 1989, 18 groundwater monitoring and 14 recovery wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except in the source area.

The petroleum release is limited to the soil and shallow groundwater. 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 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

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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 250 feet in length and the maximum dissolved concentration of methyl tert-butyl ether (MTBE) is greater than 1,000 micrograms per liter ($\mu\text{g/L}$).
- **Vapor Intrusion to Indoor Air:** Onsite, the case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk. Offsite, The case meets Policy Criterion 2a by Scenario 3b. The maximum benzene concentration in groundwater is less than 1,000 $\mu\text{g/L}$. The minimum depth to groundwater is greater than 10 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. The Site is paved and accidental exposure to site soils is prevented. Any construction crew performing subsurface work will, per the requirements of Title 8 of the California Code of Regulations, 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. The local building permitting agency has been informed of the existence of this environmental case.

Objections to Closure and Responses

According to the LTCP Checklist page in GeoTracker, finalized on May 16, 2014, the Regional Water Board objects to UST case closure because:

- Free product remains.
RESPONSE: No free product currently observed in site wells.
- Inadequate conceptual site model because soil vapor has not been evaluated.
RESPONSE: Soil vapor sampling has been conducted.
- The case does not meet Policy groundwater criteria.
RESPONSE: We concur.
- The case does not meet Policy direct contact criteria.
RESPONSE: This case meets Policy Criterion 3b.

In an email dated September 8, 2014, the Regional Water Board stated regarding June 30, 2014, Soil Vapor Assessment Report, that benzene in soil vapor did not meet the Policy Criteria.
RESPONSE: Although one offsite soil vapor sample (one of fifteen samples analyzed historically) contained an elevated benzene vapor concentration, the results cannot be attributed to the release at the Site.

