
State Water Resources Control Board

NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), CASE CLOSURE RECOMMENDATION, PURSUANT TO HEALTH AND SAFETY CODE SECTION 25299.39.2: CLAIM NUMBER: 14412; SITE ADDRESS: STANTON MOBIL; 12493 BEACH BOULEVARD, STANTON, CA 90680

NOTICE IS HEREBY GIVEN THAT the State Water Resources Control Board (State Water Board) will accept comments on the proposed underground storage tank (UST) case closure for Orange County Environmental Health Care Agency case number 99UT0302, 12493 Beach Boulevard, Orange County. The State Water Board will be considering this UST case closure summary at a future board meeting. The meeting will be noticed separately.

Health & Safety Code section 25299.39.2 subdivision (a)(1) requires that the Fund Manager notify UST owners or operators who have a Letter of Commitment (LOC) that has been in active status for five or more years and to review the case history of these sites on an annual basis unless otherwise notified by the UST owner or operator. In addition, Health & Safety Code section 25299.39.2 further states that the Fund Manager, with approval of the UST owner or operator, may recommend regulatory case closure to the State Water Board. This process is called the “5-Year Review.” The State Water Board may close or require the closure of any UST case.

Having obtained the owner/operator’s approval, and pursuant to Health & Safety Code section 25299.39.2 subdivision (a)(1), the Fund Manager recommends closure of the UST. Enclosed is a copy of the UST Case Closure Summary for the UST case. The case closure summary contains information about the UST case and forms the basis for the UST Cleanup Fund Manager’s recommendation to the State Water Board for UST case closure. A copy of the Case Closure Summary has been provided to the owner/operator, environmental consultant of record, the local agency that has been overseeing corrective action, the local water purveyor, and the water district specified by Health & Safety Code section 25299.39.2 subdivision (a)(1).

New requirements specified in Health & Safety Code section 25299.39.2 subdivision (a)(2) require that the State Water Board limit reimbursement of any correction action costs incurred after the date of this letter to \$10,000 per year, excepting special circumstances.

SUBMISSION OF WRITTEN COMMENTS

Written comments on the case closure summary to the State Water Board **must be received by 12:00 Noon on November 5, 2012**. After the deadline, staff will not accept additional written comments unless the State Water Board determines that such comments should be accepted. Please provide the following information in the subject line: **“Comment Letter – Stanton Mobil Case Closure Summary.”** Comments must be addressed to:


Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
(tel) 916-341-5600
(fax) 916-341-5620
(email) commentletters@waterboards.ca.gov

Hand and special deliveries should also be addressed to Ms. Townsend at the address above. Couriers delivering comments must check in with lobby security and have them contact Ms. Townsend at (916) 341-5600.

Please direct questions about this notice to Bob Trommer, UST Cleanup Fund, at (916) 341-5684 (btrommer@waterboards.ca.gov) or Nathan Jacobsen, Staff Counsel at (916) 341-5181 (njacobsen@waterboards.ca.gov).

September 4, 2012

Date



Jeanine Townsend
Clerk to the Board



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: Orange County Environmental Health Care Agency (County)	Address: 1241 East Dyer Road, Suite 120, Santa Ana, CA 92705
Agency Caseworker: Shyamala Sundaram	Case No.: 99UT032

Case Information

USTCF Claim No.: 14412	Global ID: T0605902327
Site Name: Farjami Mobil	Site Address: 12493 Beach Blvd., Stanton, CA
Responsible Party (RP): Fred Farjami	Address: 12493 Beach Blvd., Stanton, CA
USTCF Expenditures to Date: \$1,093,173	Number of Years Case Open: 14

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0605902361

Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Low-Threat Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Low-Threat Policy. This case meets all of the required criteria of the Low-Threat Policy. A summary evaluation of compliance with the Low-Threat Policy is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Site Information**. Highlights of the Conceptual Site Model of the case follow:

This is currently an active gas station. A leak was identified in 1992 and the County opened an initial UST case No. 92UT053 at this site. In May 1999 the UST case No. 92UT053 was closed, and a new UST case No. 99UT032 was opened by the County to address MTBE and TBA in groundwater. Since 1993, 20 monitoring wells have been installed. A groundwater extraction and treatment system (GWETS) operated from June 2003 to September 2008, treating approximately 5,882,180 gallons of groundwater removing approximately 278 pounds of TBA. An oxygen infusion was in place from 2008 to 2010; and a scaled-back GWETS operated at the site from November 2010 to November 2011. To date, over \$1 million in corrective action costs have been reimbursed by the Fund.

According to groundwater monitoring data, water quality objectives for petroleum hydrocarbons have been achieved, except for TBA. Impacted groundwater is not currently being used as a source of drinking water or for other beneficial uses. Water in the vicinity of the site is provided by the City of Golden State Water Company and one mobile home park, Villa Capri Mobile Estates (cross-gradient). No petroleum hydrocarbon constituents have been/were detected in either of the public supply wells according to GeoTracker data. No domestic wells were

identified. Based on the available information, the residual petroleum hydrocarbon at the site does not pose a significant risk to human health, safety, or the environment.

Rationale for Closure under the Low-Threat Policy

- General Criteria – The case meets all eight Policy General Criteria.
- Groundwater – The case meets Groundwater-Specific Criterion 1.
- Vapor Intrusion to Indoor Air – Soil vapor evaluation is not required because site is an active commercial petroleum fueling facility.
- Direct Contact and Outdoor Air Exposure – This case meets Policy Criterion 3.B. A professional assessment of site-specific risk from exposure shows that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health. The Site is paved and accidental access to site soils is prevented. As an active gas station, any construction worker working at the Site or adjacent to the Site will be prepared for exposure in their normal daily work.

Objections to Closure

The County initially objected to UST case closure for this case because:

- TBA concentration increased to 4,500 µg/L in one well during post-remedial monitoring, and the RP was conducting targeted remediation on-site.

Water Purveyor Golden State Water Company objected to UST case closure for this case because:

- A downward vertical groundwater gradient exists at the site and it is unclear if potential downward migration of petroleum hydrocarbons and fuel oxygenates has been adequately evaluated.
- Based on available information, additional remediation (groundwater extraction from monitoring well MW-13) was conducted in late 2011 and early 2012.
- Post-remediation groundwater monitoring is commonly conducted for one year after all active and passive remedial efforts are terminated.

Response to Objections to Closure

- County has agreed to close the Site. The petroleum hydrocarbon concentrations in all monitoring wells are below the laboratory detection limits with the exception of TBA in one monitoring well, which is now near or below the CDPH Response Level as the result of the recent focused remedial actions.
- Groundwater contamination has been delineated by the deeper screened wells (MW-8B, MW-9B, MW-10B, MW-8C, MW-9C, and MW-10C), which all report non-detect concentrations of the constituents of concern. The nearest Golden State Water Company well is approximately 952 feet upgradient to the north. The nearest downgradient Golden State Water Company well is located approximately 2,304 feet to the southeast.
- MW-13 was purged of three casing volumes prior to sampling; this is a common practice prior to collection of a groundwater sample and is not considered groundwater remediation.
- Concentrations of constituents of concern continue to decline post-remediation; no rebound in contaminant concentrations was observed.

Fund Manager Recommendation for Closure

Based on available information, residual petroleum hydrocarbons at the Site do not pose significant risks to human health, safety, or the environment, and the case meets the requirements of the Low-Threat Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board is conducting public notification. The County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock

Lisa Babcock, P.G. 3939, C.E.G. 1235

8/31/12

Date

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The site complies with the State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the site do not pose significant risk to human health, safety, or the environment.

The site complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<p>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST case closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If so, was the corrective action performed consistent with any order? There was an order issued for this site. The corrective action performed in the past is consistent with that order. Since this case meets applicable case-closure requirements, further corrective action under the order that is not necessary, unless the activity is necessary for case closure.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>General Criteria General criteria that must be satisfied by all candidate sites:</p> <p>Is the unauthorized release located within the service area of a public water system?</p> <p>Does the unauthorized release consist only of petroleum?</p> <p>Has the unauthorized (“primary”) release from the UST system been stopped?</p> <p>Has free product been removed to the maximum extent practicable?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

<p>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p> <p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Nuisance as defined by Water Code section 13050 does not exist at the site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Media-Specific Criteria Candidate sites must satisfy all three of these media-specific criteria:</p> <p>1. Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p> <p>Do site soils contain insufficient mobile constituents (leachate, vapors, or light non-aqueous phase liquids) to threaten groundwater?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>2. Petroleum Vapor Intrusion to Indoor Air: The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p>Is the site an active commercial petroleum fueling facility? Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>3. Direct Contact and Outdoor Air Exposure: The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p> <p>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?</p> <p>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

ATTACHMENT 2: SUMMARY OF BASIC SITE INFORMATION (Conceptual Site Model)

Site Location/ History

- The site is an active gasoline service station on the northwestern corner of the intersection of Beach Boulevard and Lampson Avenue in Stanton, California. The area is of mixed land use, with commercial establishments next to the major intersections, and residential areas on the opposite side of the blocks.
- The site was operated as an Exxon service station until November 1992. An unauthorized release was reported in March 1992. The site is currently operated as an active 76 service station.
- Twenty monitoring wells have been installed and monitored.
- Site map showing the location of the current USTs, monitoring wells and groundwater level contours, is provided at the end of this closure review summary.

Pollutant Source

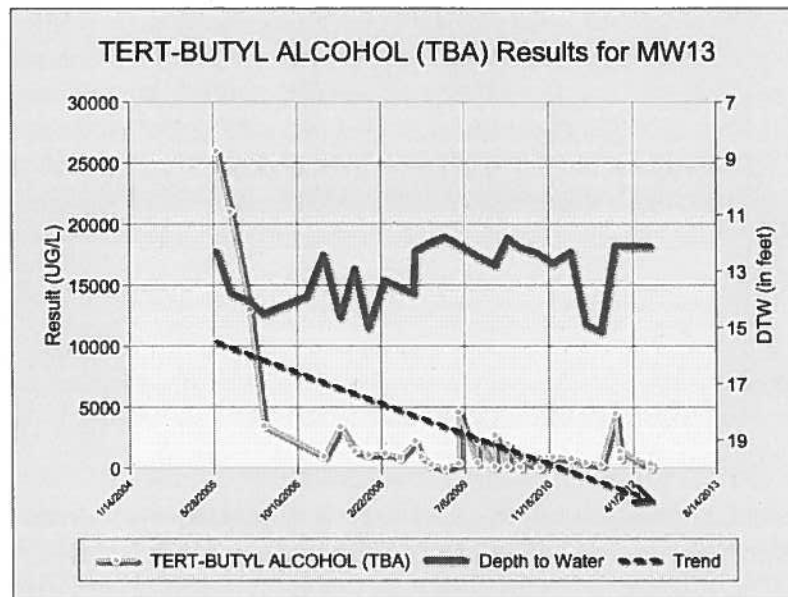
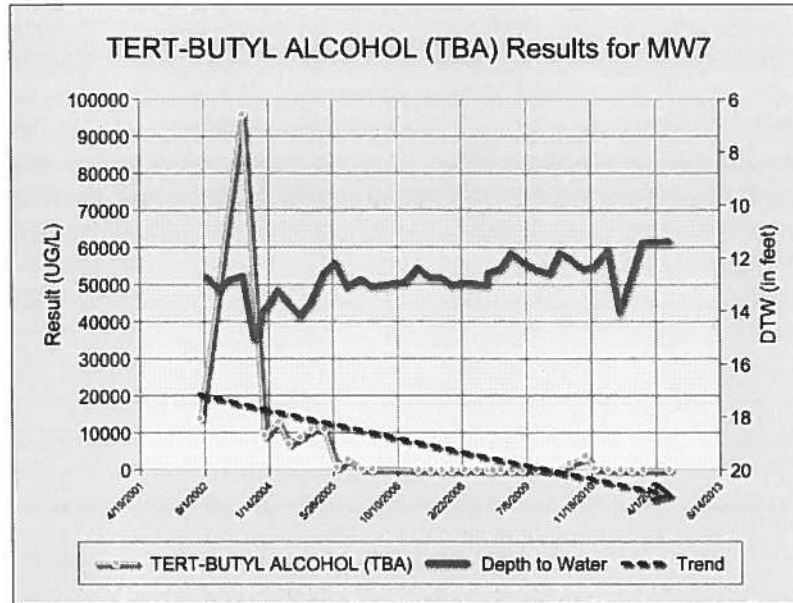
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source, Date reported and Status of Release: UST system, June 8, 1998, USTs replaced.
- Free Phase Hydrocarbons: None reported.

Geology/ Hydrogeology

- Stratigraphy: The site is underlain by sands, clayey silts and silty clays.
- Maximum Sample Depth: 75 feet below ground surface (bgs).
- Minimum Groundwater Depth: 11.37 feet bgs at monitoring well MW-7.
- Maximum Groundwater Depth: 23.27 feet bgs at monitoring well MW-9C.
- Current Average Depth to Groundwater: 14 feet bgs.
- Appropriate Screen Interval: Yes.
- Saturated Zones(s) Studied: 10 to 75 bgs.
- Groundwater Flow Direction: Predominately southwest for the shallow and intermediate zones, and southeast in the deeper zone.

Groundwater Trends:

The graphs below represent groundwater TBA trends in well MW-13 (source area) and downgradient well MW-7, which is located within the site boundaries. The reduction appears to be unrelated to variations in depth to water.



Receptors

- GW Basin: Coastal Plain of Orange County.
- Beneficial Uses: Municipal and domestic supply.
- Land Use Designation: Commercial.
- Public Water System: Golden State Water Company, Villa Capri Mobile Estates, and Magic Lamp Mobile Estates (inactive).
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are five CDPH regulated water supply wells within 1/2 mile of the site. These wells range in distance from 949 feet to 2,295 feet from the site. The water purveyor, Golden State Water Company (GSWC), reports that their company has a total of five public water supply wells within a one-mile radius of the Site (GSWC, June 8, 2012). GSWC reports that the uppermost perforations of the well located approximately 900 feet north of the Site are located approximately 200 feet bgs. In addition, two mobile home parks had

been supplying water to their residents, Magic Lamp Mobile Estates (well listed as inactive) and Villa Capri Mobile Estates downgradient and cross-gradient of the Site, respectively. No domestic supply wells were identified.

Risk Criteria

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for MTBE: Yes, see table below.
- Plume Length, Extent and Mobility: TBA is detected in one monitoring well (source area). Downgradient on-Site monitoring wells have no detectable TBA, and the plume is less than 100 feet, defined, and decreasing in size and concentration.
- Contaminated Zone(s) Used for Drinking Water: No.
- Risk from Residual Petroleum Hydrocarbons: According to the Low Threat Closure Policy, soil vapor assessments are not necessary at active gas stations. The Site is paved and accidental access to site soils is prevented. Any construction worker working at the Site or adjacent to the Site will be prepared for exposure in their normal daily work.

Remediation Summary (Secondary Source Removal)

- Free Product: None reported.
- Soil Excavation: An unknown volume of impacted soil was removed and disposed.
- In-Situ Soil Remediation: An air sparging/soil vapor extraction system operated at the site from June 1994 to September 1995.
- Groundwater Remediation: A groundwater extraction and treatment system (GWETS) was started during the second quarter of 2003, until it was shut down when it reached the point of diminishing return on September 4, 2008. During the operation of the GWETS, approximately 5,882,180 gallons of affected groundwater were extracted, treated and discharged. It was estimated that approximately 278 pounds of TBA was removed during the operation of the GWETS.

Remediation continued with the infusion of oxygen into well MW-13, starting in early 2009. The infuser however was later removed from MW-13 when TBA passed by MW-13 and appeared in the down-gradient well MW-7. Wells MW-13 and MW-7 were reconnected to a scaled-back GWETS in November 2010. As groundwater TBA in the wells continued to decline, the system was discontinued in November 2011.

Supporting Site Data

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	Not available	Gasoline	Removed	1993
2	Not available	Gasoline	Removed	1993
3	Not available	Gasoline	Removed	1993
4	Not available	Waste Oil	Removed	1993

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (07/2012)
MW-1	1992	5-25	12.23
MW-2	1992	10-30	13.50
MW-3	1992	10-30	12.75
MW-4	1992	10-30	13.79
MW-5	1993	5-35	11.99
MW-6	1993	5-35	12.69
MW-7	1993	4-24	11.37
MW-8A	2001	4-24	11.98
MW-8B	2001	45-50	12.41
MW-8C	2001	70-75	13.57
MW-9A	2001	5-25	13.64
MW-9B	2001	45-50	14.34
MW-9C	2001	70-75	15.85
MW-10A	2001	5-25	13.84
MW-10B	2001	45-50	14.85
MW-10C	2001	70-75	16.89
MW-11	2005	10-25	12.31
MW-12	2005	10-25	12.74
MW-13	2005	10-25	12.11

Petroleum Hydrocarbon Constituent Concentration

Contaminant	Water (µg/L)		WQOs (µg/L) MCL/Low Risk
	Maximum ^a	Latest (7/10/2012)	
TPHg	4,000	<50	NL
Benzene	8.4	<0.5	1/250
Toluene	17	<1.0	150/300
Ethylbenzene	3.5	<1.0	300/680
Xylenes	17.4	<1.0	1,750/1,750
MTBE	47,000	2.1	13 primary/5 secondary
TBA	1,500,000	420	12/1,200 ^b
Naphthalene	NA	NA	170 ^c

NA: Not Analyzed, Not Applicable or Data Not Available

NL: Not listed

mg/kg: milligrams per kilogram, parts per million

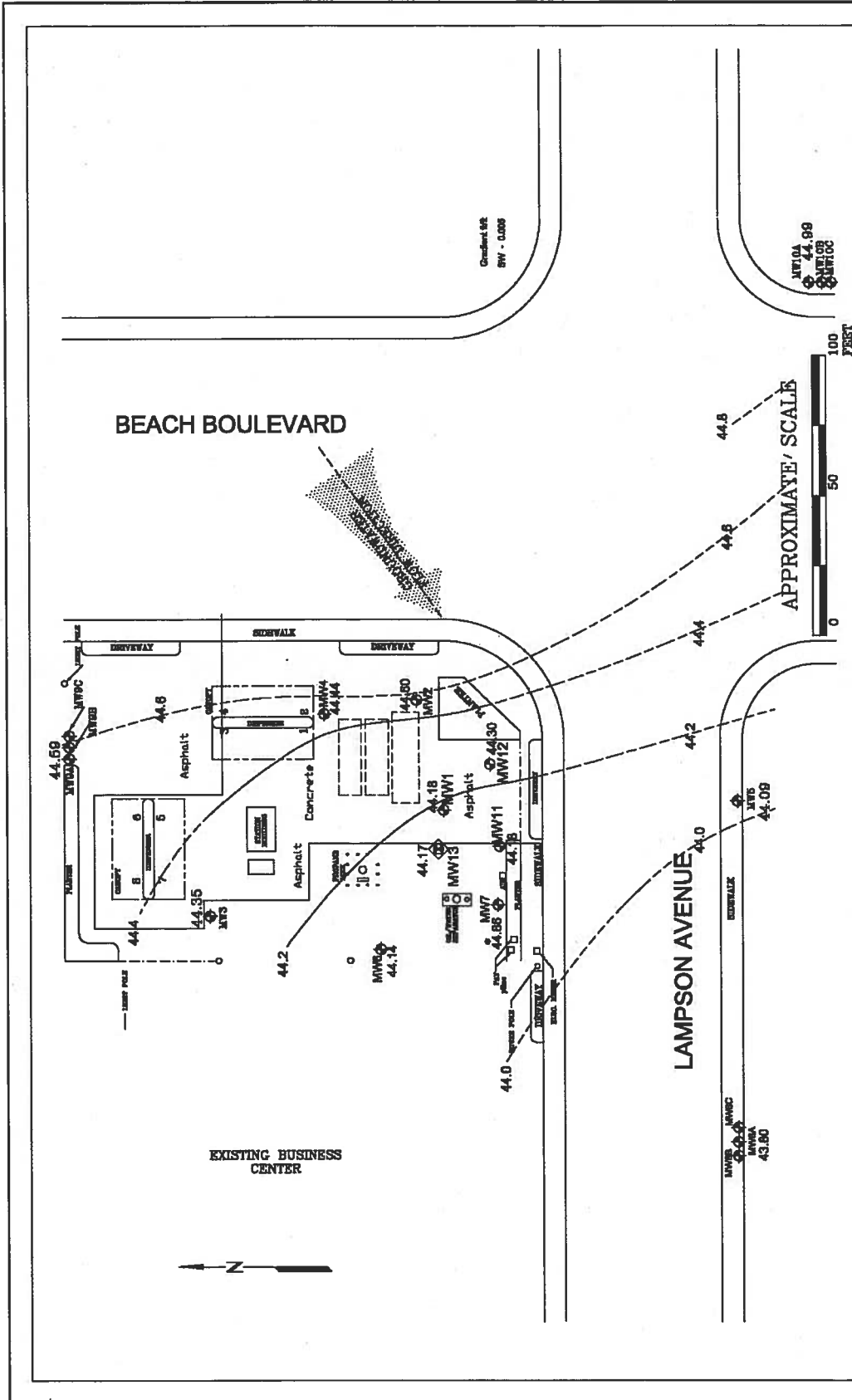
µg/L: micrograms per liter, parts per billion

WQOs: Water Quality Objectives, Region 8 RWQCB Basin Plan

^a According to GeoTracker Data for monitoring well groundwater data only

^b California Department of Public Health Notification Level/ Response Level

^c California Department of Public Health Action Level



PROJECT NO.	3148
PLATE	2
	07/20/12

EXPLANATION	
MW10A Groundwater monitoring well	
MW13 Recovery well	
44.44 Groundwater elevation	
44.86 Line of equal groundwater elevation (A Level Wells)	
Not used for contouring	
Underground storage tank	

GROUNDWATER CONTOUR
MAP-07/10/12

STANTON MOBIL
12493 Beach Boulevard
Stanton, California



Cardno
ERI

Shaping the Future

3148-2011-QM2-P2

