



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

June 8, 2011

Ms. Marilyn Kraft, Supervisor
San Bernardino County Fire Department
Hazardous Materials Division
Local Oversight Program
620 South "E" Street
San Bernardino, CA 92415-0153

Subject: Submission of Final Report – Review of Leaking Underground Storage Tank (LUST) Cases, Non Clean-up Fund, Open > 15 Years, Not Ready for Closure

Dear Ms. Kraft:

We are sending you the enclosed copy of the Final Report – *Review of Leaking Underground Storage Tank (LUST) Cases, Non-Clean-up Fund, Open > 15 years*, for your agency files. This final report includes revisions to the draft final report based on comments received from you. A copy of the final version of this report has also been sent to the State Water Resources Control Board (SWRCB). This report was prepared as an "In-Kind" task and part of a cooperative agreement between USEPA Region 9 and the State Water Resources Control Board (SWRCB).

We appreciate the timeliness and professionalism you and your agency afforded us in the interview and draft report review process.

If you have any questions related to this matter, you can contact me at: (415) 972-3530 or via email at Coffman.Joel@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Joel Coffman".

Joel Coffman, P.G.
Environmental Scientist
Underground Storage Tanks Program

Attachments: Final Report

Cc: Kevin Graves, California State Water Resources Control Board
Steven Linder, US EPA Region 9

Final

June 8, 2011

Review of Leaking Underground Storage Tank Cases Not in Cleanup Fund and Open Over 15 Years

**San Bernardino County
Local Oversight Program**

**Prepared as in-kind task as part of Cooperative Agreement LS-
96934701-1 between USEPA Region 9 and the California State Water
Resources Control Board**

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Executive Summary

The Draft version of this report was submitted on November 17, 2010, with a request for a follow-up meeting and input from San Bernardino County Local Oversight Program (LOP) into the “Next Steps for Agency” column of the case cleanup status spreadsheet.

U.S. Environmental Protection Agency (USEPA) Region 9 contractor, Sullivan International Group, Inc., contacted the agency via telephone on February 15, 2011 to discuss the draft report and their next steps for each case. The agency responded on February 16, 2011 and indicated one case has been transferred to the Regional Board on November 5, 2010 and for their other case, closure was in progress and the agency was awaiting well deconstruction. The “Next Steps for Agency” were submitted and approved by the agency via email on February 23, 2011.

The Draft Final version of this report was submitted for agency approval on May 12, 2011 via email and agency comments were received on June 2, 2011. The well deconstruction report was submitted to GeoTracker on May 13, 2011 for the case where closure was in progress and closed on May 19, 2011. Therefore, the agency does not have any cases not in the Cleanup Fund and over 15 years old. San Bernardino County will cease to be an LOP effective July 1, 2011 and their remaining open cases will be transferred to another agency.

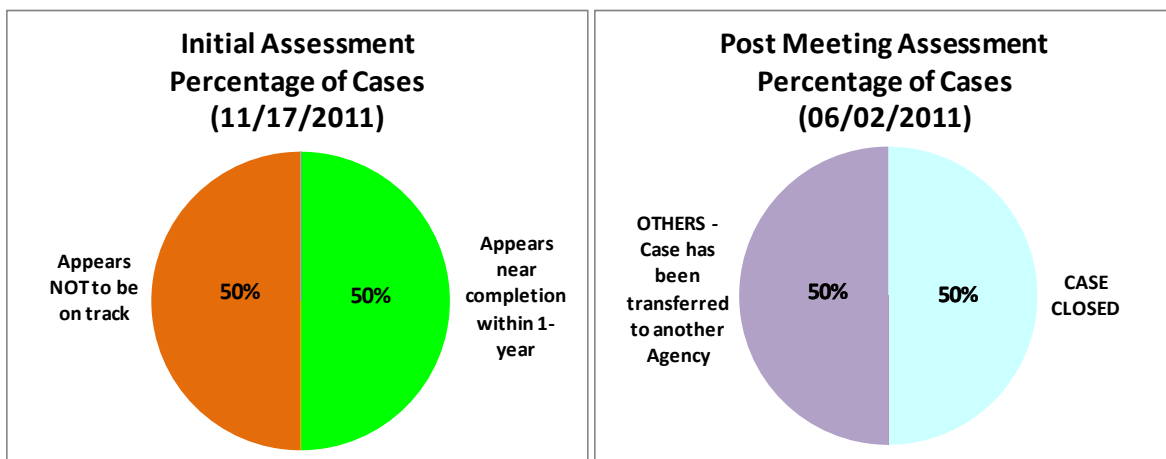
San Bernardino County LOP:

Apparent Case Status – Initial and After

TOTAL NUMBER OF CASES REVIEWED = 2
 NUMBER OF ACTIVE LUST CASES ON NOVEMBER 1, 2010 = 33 CASES
 DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON NOVEMBER 17, 2010
 RESPONSE/MEETING WITH AGENCY ON FEBRUARY 16, 2011
 AGENCY COMMENTS ON DRAFT FINAL VERSION RECEIVED ON JUNE 2, 2011

APPARENT STATUS OF CASES REVIEWED – INITIAL REVIEW AND AFTER MEETING TO DISCUSS CASES

Apparent Case Status	Initial Assessment Number of Cases (11-17-2010)	Post Meeting Assessment Number of Cases (06-02-2011)
CASE CLOSED	0	1
Appears close to completion	0	0
Appears near completion within 1-year	1	0
Appears to be on track	0	0
Appears NOT to be on track	1	0
Appears to be stuck	0	0
Unable to determine (Insufficient information in GeoTracker)	0	0
NOT FEDERAL UST CASE	0	0
OTHERS - Case has been transferred to another Agency	0	1



NOTE: The meeting was conducted on February 16, 2011 and the updated case status is based on agency comments/updates received on June 2, 2011 on the Draft Final report submitted on May 12, 2011.

Aging Non-CUF Case Summary Review Table

ESTIMATED STATUS IN THE CLEANUP PIPELINE? (11-16-2010)	CHANGE IN STATUS IN THE CLEANUP PIPELINE (BASED ON AGENCY COMMENTS OF DRAFT FINAL) ON 06-02-2011	SITE NAME (CASE LEAD AGENCY: SAN BERNARDINO COUNTY LOP)	GLOBAL ID	CASE WORKER	PRIMARY COC (In GeoTracker)	APPARENT TYPE OF RP	RELEASE DATE	DISCUSSION NOTES FROM MEETING/CALL (02-16-2011)	AGENCY COMMENTS (06-02-2011)	NEXT STEP FOR AGENCY
Appears near completion within 1-year	CASE CLOSED	MOBIL #18-HVF	T0607100246	Catherine Richards (CR2)	Gasoline	Z - Major Oil Company	4/1/1992	<ul style="list-style-type: none"> • Closure in Progress • Awaiting well deconstruction 	<ul style="list-style-type: none"> • Well deconstruction report was submitted to GeoTracker on 5/13/2011 • Case was closed by the agency on 5/19/2011 with Remedial Action Completion Certificate dated and uploaded to GeoTracker on 5/19/2011 	Not Applicable
Appears NOT to be on track	Case has been or will be transferred to another Agency	CALTRANS DRY CREEK MAINTENANCE	T0607100751	Jackson Crutsinger (JC3)	Gasoline	G - Government Entity (include School, Hospital, Utility)	7/20/1995	<ul style="list-style-type: none"> • Case has been transferred to Region 6; not applicable to this report as of 11/5/2010 	<ul style="list-style-type: none"> • None 	Not Applicable

Attachment 1:

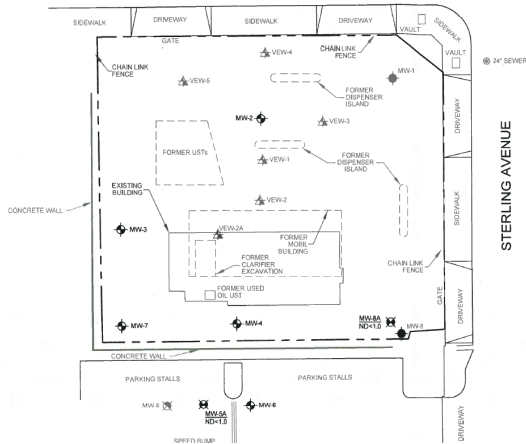
Case Review Power Point Slides from Draft Report

The Power Point slides from the draft report have not been updated and are not intended to reflect the current status of the cases at the time the final report was produced. They are to be used solely for reference.

1. T0607100246 (MOBIL #18-HVF)
2. T0607100751 (CALTRANS DRY CREEK MAINTENANCE)

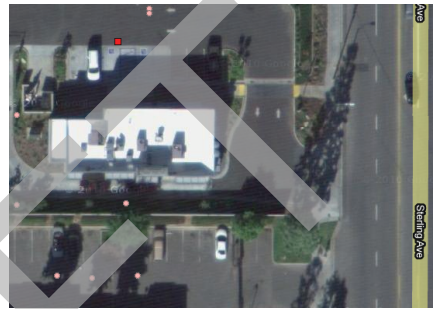
MOBIL #18-HVF (T0607100246)

25699 E Baseline Street, Highland, CA 92410



Case Age: 18
 Primary COC: Gasoline
 RP Identified by Regulator: MOBIL OIL CORPORATION
 Current Land Use: Commercial, nearby residential

OPEN - REMEDIATION
CLEANUP OVERSIGHT AGENCIES
 SAN BERNARDINO COUNTY LOP (LEAD) - CASE #: 92015
 CASEWORKER: CATHERINE RICHARDS - SUPERVISOR: MARILYN KRAFT
 SANTA ANA RWQCB (REGION 8) - CASE #: 083602018T
 CASEWORKER: ROSE SCOTT - SUPERVISOR: Ken Williams



NOTE: Data queried from GeoTracker and reviewed in November 2010

Possible Reasons Why This Case Is So Old

- Inconsistent monitoring prior to 2001
- Elevated levels of MTBE concentrations previously in one monitoring well
- Monitored natural attenuation began in 4/2002
- Agency is transitioning its site remediation program to an LIA effective 7/1/2011-closing sites and transferring sites to Regional Board

Activities Conducted to Date Based on GeoTracker Info T0607100246

Assessment last 5 years

- 4/2007 soil sampling and installation of MW-2, MW-3, & MW-4
- 4/7/2007 Soil samples collected from MW-2, MW-3, MW-4
- 4/17/2007 groundwater samples collected from MW-2, MW-3, MW-4
- 12/8-9/2008 Assessment of confirmation borings, CB-1 through CB-4
- 4/2009 Installation of MW-8A
- 6/2009 Installation of MW-5A
- Quarterly groundwater monitoring since 2001
- Current quarterly groundwater monitoring through MW-2, MW-3, MW-4, MW-5A, MW-6, MW-7, MW-8A

Remediation last 5 years

- 6/5/2006 ORC socks changed
- 4/2007 Installation of temporary above-ground remedial piping and soil vapor extraction system
- 4/19 – 5/21/2007 Cycle 1 of SVE rebound test
- 6/18 – 7/2/2007 Cycle 2 of SVE rebound test
- 7/16 – 7/23/2007 Cycle 3 of SVE rebound test
- Monitored natural attenuation since 2002

Assessment older than 5 years

- 2-3/1992 Drilling and sampling of fifteen soil borings (B-1 through B-15)
- 2-3/1992 Installation of MW-1
- 10/1992 further assessment using soil borings B-16 through B-20
- 10/1997 Drilling and sampling of B-21
- 11/1998 Installation of MW-2 through MW-4
- 4-5/2001 Installation of offsite MW-5 & MW-6

Remediation older than 5 years

- 2-3/1992 Installation of VEW-1, VEW-2 in B-5 & B-14
- 7/1992 Demolition and removal of USTs and station facilities
- 10/1992 installation of VEW-3 through VEW-5
- 1/1993 Vapor extraction pilot test
- 4/1996 VEW-2A installed, VEW-2 & MW-1 abandoned
- 11/1999-1/2000 operation of dual phase vacuum extraction system
- 8/20/2001 Initiation of soil vapor extraction
- 2/6/2003 ORC injected into MW-4
- 11/5/2004 ORC injected into MW-2

IMPEDIMENTS TO CLOSURE T0607100246

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 2/11/2010

IMPEDIMENTS TO CLOSURE**INADEQUATE SOURCE CONTROL**

Remaining Source Poses Threat to Groundwater - *There is elevated concentrations of MtBE in one monitoring well.*

GROUNDWATER IMPACTS

Other - *There is elevated concentrations of MtBE in one monitoring well.*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *If concentrations of MtBe in groundwater do not diminish, groundwater remediation may be necessary.* Restore Blighted Property to Productive Use - *A restaurant is proposed to be built at the site.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

Groundwater, Already Impacted, Elevated MtBE in one well.

Review Conclusions T0607100246

- Prior to 2001, GeoTracker site documents show inconsistency in monitoring and assessment.
- Site was recently redeveloped into a fast food restaurant.
- 1Q2010 report indicates concentrations of benzene and MtBE are below MCLs.
- Closure request report extension granted by regulator and scheduled to be submitted by 11/15/2010.
- Agency is transitioning its site remediation program to an LIA effective 7/1/2011; they are closing sites and transferring sites to Regional Board.
- *Discussion: Closure report expected by consultant, may need to enforce deadlines if additional work is warranted.*

CALTRANS DRY CREEK MAINTENANCE (T0607100751)

32821 HILLTOP DR./HWY 18, ARROWBEAR , CA 92382



Case Age: 15
 Primary COC: Gasoline
 RP Identified by Regulator: CALTRANS DISTRICT 8
 Current Land Use: Appears commercial

OPEN - REMEDIATION

CLEANUP OVERSIGHT AGENCIES
 SAN BERNARDINO COUNTY LOP (LEAD) - CASE #: 95037
 CASEWORKER: JACKSON CRUTSINGER - SUPERVISOR: MARILYN KRAFT
 LAHONTAN RWQCB (REGION 6V) - CASE #: 6B3600353T
 CASEWORKER: Jan M. Zimmeman - SUPERVISOR: PATRICE COPELAND

Possible Reasons Why This Case Is So Old

- No activities from initial investigation for 7 years, from 1995 to 2002, and no activities since. Appears one notice to comply letter sent in 2009
- Appears case was previously managed by San Bernardino County Environmental Services and in 2010, consultant review was addressed to San Bernardino County Fire Department
- This agency is transitioning their site remediation program to an LIA, effective 4/2011
- No data in GeoTracker
- Caltrans Funding issue?



NOTE: Data queried from GeoTracker and reviewed in November 2010

Activities Conducted to Date Based on GeoTracker Info

T0607100751

Assessment last 5 years

- None

Remediation last 5 years

- None

Assessment older than 5 years

- Soil and grab groundwater samples collected 7/1995
- Soil and grab groundwater samples collected 6/2002

Remediation older than 5 years

- Two USTs removed (three additional discovered and removed) and extensive soil over excavated in 7/1995

IMPEDIMENTS TO CLOSURE T0607100751

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 11/3/2010**IMPEDIMENTS TO CLOSURE****SITE ASSESSMENT INCOMPLETE***Other - Further assessment and additional groundwater sampling is necessary to substantiate plume stability.***PLUME INSTABILITY***Groundwater Contamination Plume Not Stable or Decreasing - Further assessment and additional groundwater sampling is necessary to substantiate plume stability.***PROCEDURAL IMPEDIMENTS***RP Says They Do Not Have Adequate Funds to Initiate or Continue Work at the Site - Caltrans is not able to fund additional assessment at this time.***BENEFITS OF ADDITIONAL WORK***Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - Further assessment and additional groundwater sampling is necessary to substantiate plume stability.***SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**

Municipal Well, Undetermined, No known impacts

Domestic Wells, Undetermined, No known impacts

Groundwater, Already Impacted

Surface Water (Bay, Estuary, Stream, Lake), Undetermined, No known impacts

Storm drain (Runoff of contaminated soil), Undetermined, No known impacts

Indoor Air (Residential or Commercial), Undetermined, No known impacts

Irrigation / Industrial Well, Undetermined, No known impacts

Other, Undetermined, No known impacts

Review Conclusions T0607100751

- Limited regulatory oversight and enforcement, no activities for seven years after initial investigation until 2002 and notice to comply letter from LOP sent 12/2009.
- Consultant review in 2010 indicated grab groundwater samples were collected from the open excavation and an open borehole in 2002, not necessarily representative of groundwater and indicated these concentrations, particularly of benzene, were detected above current MCLs. Also, residual contamination below the gas/oil house was not delineated.
- Agency is transitioning its site remediation program to an LIA effective 7/1/2011; they are closing sites that are ready for closure and transferring open sites to Regional Board.
- *Discussion: How to move case toward closure? Additional assessment appears necessary. Sensitive receptor survey? Closure review indicates Caltrans funding issues.*