

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
ORDER WQ 2013-0073-UST

**In the Matter of Underground Storage Tank Case Closure
Pursuant to Health and Safety Code Section 25296.10 and the Low-Threat
Underground Storage Tank Case Closure Policy**

BY THE EXECUTIVE DIRECTOR¹:

By this order, the Executive Director directs closure of the underground storage tank (UST) case at the site listed below, pursuant to section 25296.10 of the Health and Safety Code². The name of the responsible party, the site name, the site address, the Underground Storage Tank Cleanup Fund (Fund) claim number if applicable, the lead agency, and case number are as follows:

**Mr. Marvin Katz, Shell Oil Products US
Texaco
25561 Jeronimo Road, Mission Viejo, Orange County
Fund Claim No. 10193
Orange County Local Oversight Program, Case No. 01UT019**

I. STATUTORY AND PROCEDURAL BACKGROUND

Upon review of a UST case, the State Water Resources Control Board (State Water Board) may close or require closure of a UST case where an unauthorized release has occurred, if the State Water Board determines that corrective action at the site is in compliance with all of the requirements of subdivisions (a) and (b) of section 25296.10. The State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure of a UST case. Closure of a UST case is appropriate where the corrective

¹ State Water Board Resolution No. 2012-0061 delegates to the Executive Director the authority to close or require the closure of any UST case if the case meets the criteria found in the State Water Board's Low Threat Underground Storage Tank Case Closure Policy adopted by State Water Board Resolution No. 2012-0016.

² Unless otherwise noted, all references are to the California Health and Safety Code.

action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with: 1) Chapter 6.7 of division 20 of the Health and Safety Code and implementing regulations; 2) Any applicable waste discharge requirements or other orders issued pursuant to division 7 of the Water Code; 3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

State Water Board staff has completed a review of the UST case identified above, and recommends that this case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Summary has been prepared for the case identified above and the bases for determining compliance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closures (Low-Threat Closure Policy or Policy) are explained in the Case Closure Summary.

Low-Threat Closure Policy

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low-Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low-threat to human health, safety, the environment, and are appropriate for closure under Health and Safety Code section 25296.10. The Policy provides that if a regulatory agency determines that a case meets the general and media-specific criteria of the Policy, then the regulatory agency shall notify responsible parties and other specified interested persons that the case is eligible for case closure. Unless the regulatory agency revises its determination based on comments received on the proposed case closure, the Policy provides that the agency shall issue a uniform closure letter as specified in Health and Safety Code section 25296.10. The uniform closure letter may only be issued after the expiration of the 60-day comment period, proper destruction or maintenance of monitoring wells or borings, and removal of waste associated with investigation and remediation of the site.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a uniform closure letter or a letter of commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied.

II. FINDINGS

Based upon the UST Case Closure Summary prepared for the case attached hereto, the State Water Board finds that corrective action taken to address the unauthorized release of petroleum at the UST release site identified as:

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ensures protection of human health, safety, and the environment and is consistent with Chapter 6.7 of division 20 of the Health and Safety Code and implementing regulations, the Low-Threat Closure Policy and other water quality control policies and applicable water quality control plans.

Pursuant to the Low-Threat Closure Policy, notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60-day comment period has been provided to notified parties, and any comments received have been considered by the State Water Board in determining that the case should be closed.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Water Board (Regional Water Board) pursuant to division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to division 7 of the Water Code, or directives issued by a Local Oversight Program (LOP) agency for this case should be rescinded to the extent they are inconsistent with this Order.

III. ORDER

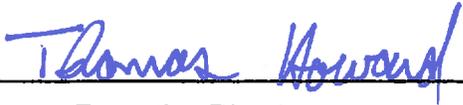
IT IS THEREFORE ORDERED that:

- A. The UST case identified in Section II of this Order, meeting the general and media-specific criteria established in the Low-Threat Closure Policy, be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a uniform closure letter, the responsible party is ordered to:

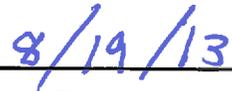
1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;
 2. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and
 3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in Section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.
- B. The tasks in subparagraphs (1) and (2) of Paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299, subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.
- C. Within 30 days of receipt of proper documentation from the responsible party that requirements in subparagraphs (1) and (2) of Paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.
- D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to Paragraph (C), the Deputy Director of the Division of Water Quality shall issue a uniform closure letter consistent with Health and Safety Code section 25296.10, subdivision (g) and upload the uniform closure letter and UST Case Closure Summary to GeoTracker.
- E. As specified in Health and Safety Code section 25299.39.2, subdivision (a) (2), corrective action costs incurred after a recommendation of closure shall be limited to \$10,000 per year unless the State Water Board or its delegated representative agrees that corrective action in excess of that amount is necessary to meet closure requirements, or additional corrective actions are necessary pursuant to section

25296.10, subdivision (a) and (b). Pursuant to section 25299.57, subdivision (l) (1), and except in specified circumstances, all claims for reimbursement of corrective action costs must be received by the Fund within 365 days of issuance of the uniform closure letter in order for the costs to be considered.

- F. Any Regional Water Board or LOP agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case identified in Section II is rescinded, but only to the extent the Regional Water Board order or LOP agency directive is inconsistent with this Order.



Executive Director



Date



State Water Resources Control Board

UST CASE CLOSURE SUMMARY

Agency Information

Table with 2 columns: Agency Name, Address, Agency Caseworker, Case No.

Case Information

Table with 2 columns: USTCF Claim No., Global ID, Site Name, Site Address, Responsible Party, Address, USTCF Expenditures to Date, Number of Years Case Open

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0605971490

Summary

The Low-Threat Underground Storage Tank 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 meets all of the required criteria of the 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 are as follows:

The unauthorized release was discovered during dispenser and product line upgrades in December 2000. Between 2000 and 2008, 9 monitoring wells were installed and 18 soil borings were drilled and sampled. The residual contaminate mass is well defined horizontally and vertically. Soil and groundwater analytical data demonstrate that residual contamination is stable and remains in a localized area within 200 feet of the source area. Wayne Perry Inc. conducted an extraction/air sparge pilot study in 2008, and concluded that extraction technologies were ineffective due to Site lithology with low permeability resulting in limited contaminant and groundwater mobility in the subsurface. The Site is currently an active petroleum fueling facility surrounded by commercial and residential developments.

The petroleum release is limited to the shallow soil and groundwater. The affected groundwater is not currently being used as a source of drinking water or for any other designated beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or for any other beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals and screens that are in deeper more protected aquifers. Remaining petroleum constituents are limited, stable and declining. Remedial actions have been implemented and further remediation would be ineffective and expensive. Additional assessment/monitoring will not likely

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE OFFICER

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change the conceptual model. Any remaining petroleum constituents do not pose significant risk to human health, safety, or the environment.

Rationale for Closure under the Policy

- General Criteria – Site **MEETS ALL EIGHT GENERAL CRITERIA** under the Policy.
- Groundwater Media-Specific Criteria – Site meets the criterion in **CLASS 2**. Based on an analysis of Site-specific conditions the plume length that exceeds water quality objectives is less than 250'. There is no free product. The nearest existing water supply well or surface water body is greater than 1,000 feet from the estimated plume boundary. The dissolved concentration of benzene is less than 3,000 micrograms per liter ($\mu\text{g/l}$), and the dissolved concentration of MTBE is less than 1,000 $\mu\text{g/l}$.
- Petroleum Vapor Intrusion to Indoor Air – Site meets the **ACTIVE FUELING FACILITY** exception for vapor intrusion to indoor air, and has no release characteristics that can be reasonably believed to pose an unacceptable health risk.
- Direct Contact and Outdoor Air Exposure – Site meets **CRITERIA (3) a**. Maximum concentrations of benzene and ethylbenzene in soil are less than or equal to those listed in Table 1. The estimated naphthalene concentrations in soil meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of ten. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Objections to Closure

Orange County Local Oversight Program (Orange County LOP) staff objects to UST case closure because:

1. The elevated concentrations dissolved phase Tert-Butyl Alcohol (TBA) indicate that the secondary source has not been removed to the maximum extent practicable.
RESPONSE: The 2008 extraction/air sparge pilot test conceded that the underlying siltstone and fine-grained silty sandstone would be not well suited for extraction or injection remedial alternatives.

Given that the site meets all of the Policy criteria and the fact that the geology is not conducive to extraction or injection, further remediation is not practicable.

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Recommendation for Closure

The corrective action performed at this Site ensures the protection of human health, safety, the environment and is consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations, applicable state policies for water quality control and the applicable water quality control plan, and case closure is recommended.

Prepared By: *Matthew Cohen*
Matthew Cohen
Engineering Geologist

5/10/2013
Date

Reviewed By: *George Lockwood*
George Lockwood, PE No. 59556
Senior Water Resource Control Engineer

5/10/2013
Date



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

The site complies with 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?</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>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</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 type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

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

<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>Does nuisance as defined by Water Code section 13050 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><u>Media-Specific Criteria</u> 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? If YES, check applicable class: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p> <p>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</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>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><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><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</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>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 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><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

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

Site Location/ History

- The Site is located at the east corner of the intersection of Jeronimo Road and Los Alisos Boulevard in Mission Viejo, California.
- The Site is an active petroleum fueling facility.
- The Site is bounded by residential to the north; commercial to the east and south, and a park to the west.
- The contaminants of concern are petroleum hydrocarbons only.
- The primary source of the release was the UST system.
- The leak discovery date was December 2000.
- The release type was petroleum².
- No free product has ever been detected at the Site.

Table A. USTs:

Tank No.	Size	Contents	Status	Date
1	10,000 gallon	Gasoline	Active	-
2	10,000 gallon	Gasoline	Active	-
3	10,000 gallon	Gasoline	Active	-
4	10,000 gallon	Diesel	Active	-

Receptors

- Groundwater Basin: San Juan Valley(9-1).
- Groundwater Beneficial Uses: Municipal and domestic supply (MUN); agricultural supply (AGR); Contact Water Recreation (REC-1); Non-contact Water Recreation (REC-2); Warm Freshwater Habitat (WARM); and Wildlife Habitat (WILD).
- Designated Land Use: Commercial Neighborhood.
- Public Water System: Moulton Niguel Water District.
- Distance to Nearest Surface Waters: Aliso Creek, located 1,200 feet upgradient.
- Distance to Nearest Supply Wells: Grater than one mile.

Geology/ Hydrogeology

- Average Groundwater Depth: ~12 feet bgs
- Minimum Groundwater Depth: ~4.5 feet bgs
- Groundwater Flow Direction: Southwest
- Geology: Siltstone and fine-grained silty sandstone of the Niguel Formation underlay the Site to the total explored depth of approximately 40 feet
- Hydrogeology: Hydraulic conductivity is very low.

² "Petroleum" means crude oil, or any fraction thereof, which is liquid at standard conditions of temperature and pressure, which means at 60 degrees Fahrenheit and 14.7 pounds per square inch absolute.
(Health & Saf. Code, § 25299.2.)

Texaco
25561 Jeronimo, Mission Viejo

Corrective Actions

- 2000 – 2008 Site assessment
- 2008 Extraction/Injection Pilot Study

Table B: Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 ft. bgs (mg/kg)	Maximum 5-10 ft. bgs (mg/kg)
Benzene	0.008	ND
Ethylbenzene	0.011	ND
Naphthalene	NA	NA
PAHs	NA	NA

ND = Not detected

NA = Not analyzed

PAH = poly-aromatic hydrocarbons

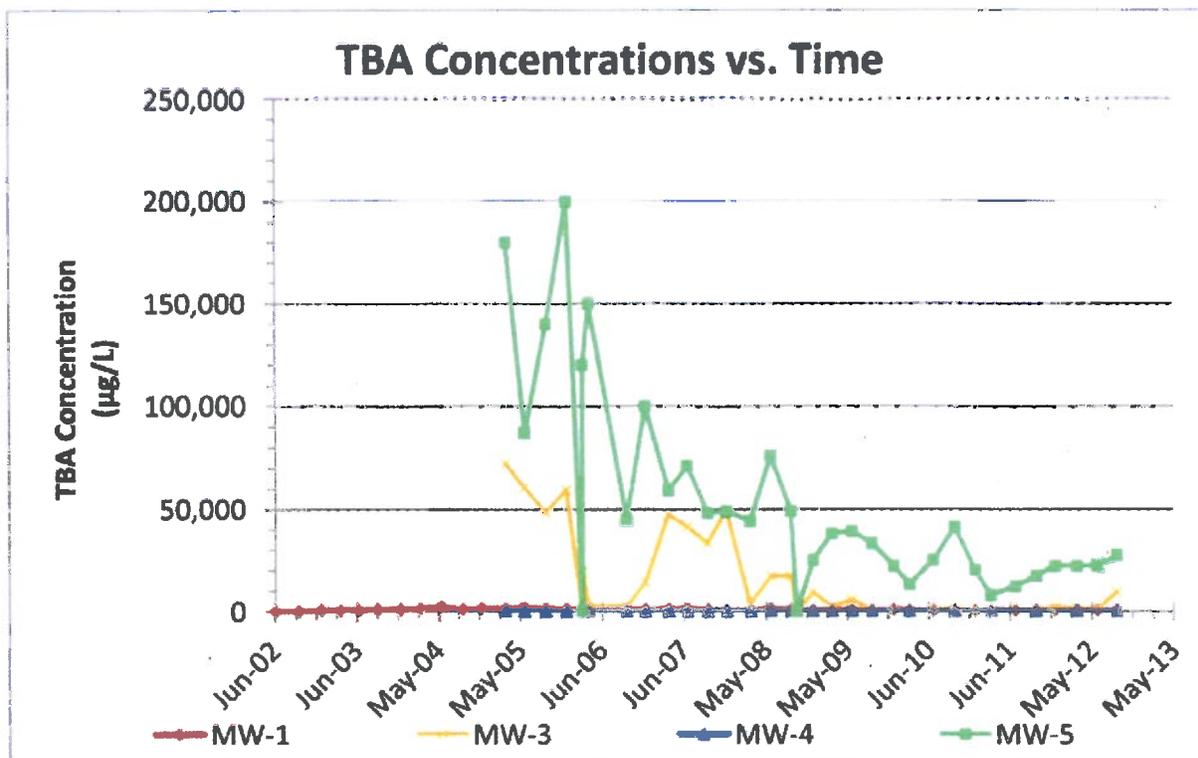
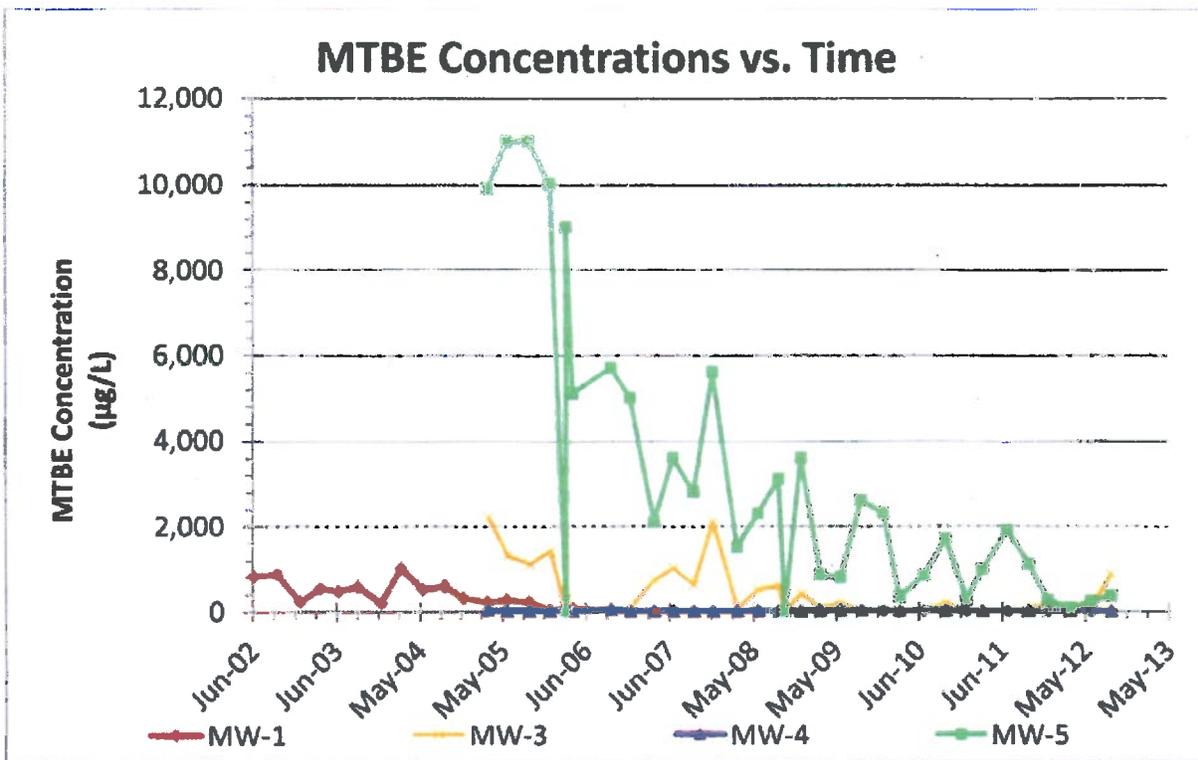
Table C: Concentrations of Petroleum Constituents of Concern in Groundwater

Sample	Sample Date	TPHg (ppb)	Benzene (ppb)	Toluene (ppb)	Ethylbenzene (ppb)	Xylenes (ppb)	MTBE (ppb)	TBA (ppb)
MW-1	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	1	190
MW-2	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	0.69	<10
MW-3	9/24/2012	1,600	<10	<10	<10	<20	850	9,000
MW-4	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	5.2	<10
MW-5	9/24/2012	<2,000	<20	<20	<20	<40	360	27,000
MW-6	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<10
MW-7	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<10
MW-8	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<10
MW-9	9/24/2012	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<10
WQOs	-	50	1	150	300	1750	5	12*

WQOs - Water Quality Objectives

* California Notification Level

Groundwater Trends



Evaluation of Risk Criteria

- **Maximum Petroleum Constituent Plume Length above WQOs:** The dissolved MTBE plume is approximately 200 feet in length.
- **Petroleum Constituent Plume Determined Stable or Decreasing:** Yes.
- **Soil/Groundwater Sampled for MTBE:** Yes, see Table C above.
- **Residual Petroleum Constituents Pose Significant Risk to the Environment:** No .
- **Residual Petroleum Constituents Pose Significant Vapor Intrusion Risk to Human Health:** Site meets exception for active petroleum fueling facility. Site conditions demonstrate that the residual petroleum constituents in soil and groundwater are protective of human health.
- **Residual Petroleum Constituents Pose a Nuisance³ at the Site:** No.
- **Residual Petroleum Constituents in Soil Pose Significant Risk of Adversely Affecting Human Health:** No.
- **Residual Petroleum Constituents Pose Significant Direct Contact and Outdoor Air Exposure to Human Health:** No – There are no soil samples results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2% benzene and 0.25% naphthalene. Therefore, benzene concentrations can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Table 1 of the Policy. Therefore, estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

³ Nuisance as defined in California Water Code, section 13050, subdivision (m).

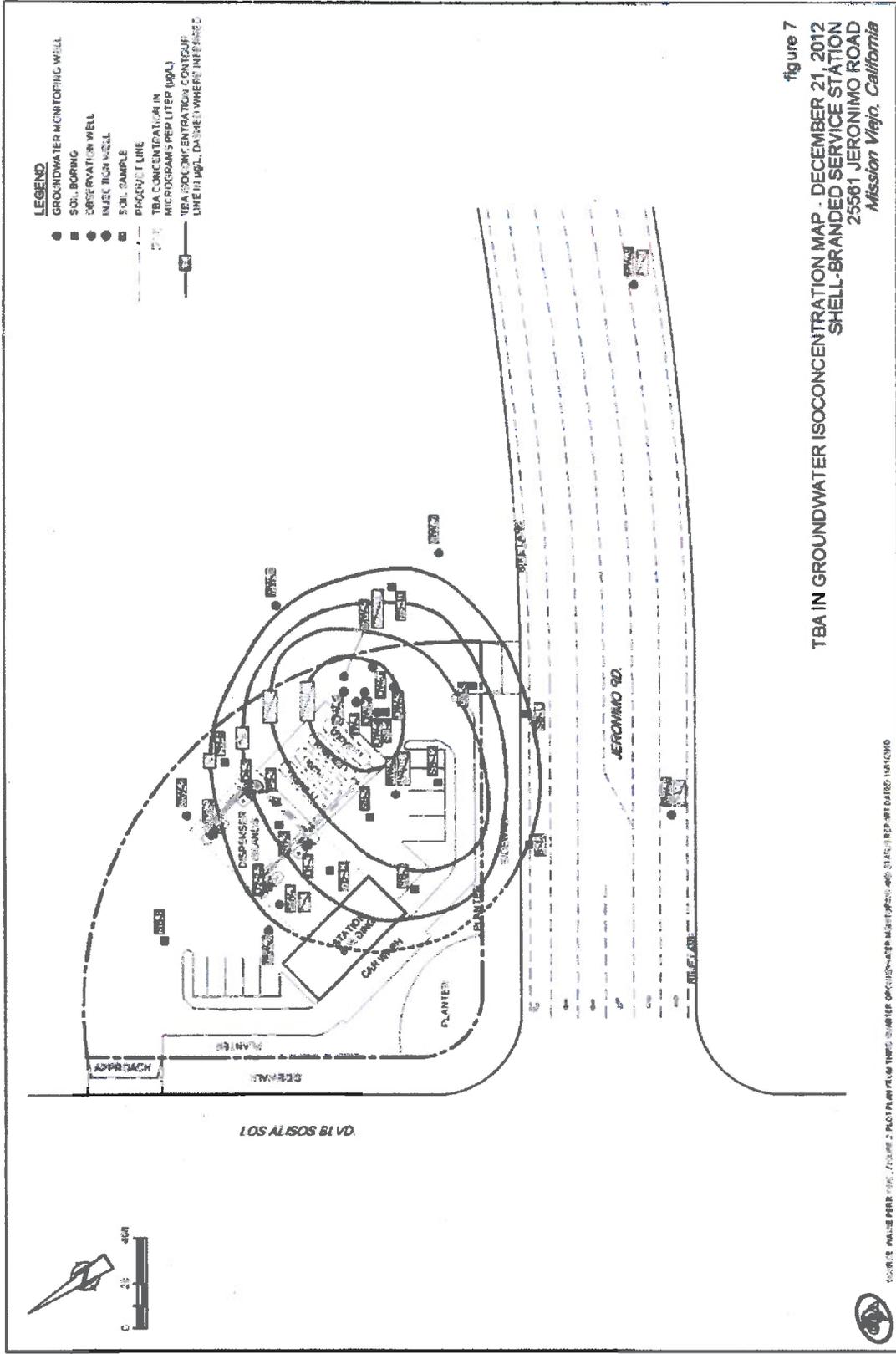


figure 7
TBA IN GROUNDWATER ISOCONCENTRATION MAP - DECEMBER 21, 2012
SHELL-BRANDED SERVICE STATION
25561 JERONIMO ROAD
Mission Viejo, California

Source: VALUE PER TEST, JERONIMO 2. PLOT IN UWL IN MICROGRAMS PER LITER (UWL) AND TBA IN UWL DASHED WHERE INFERRING
GESP-30011308-01-NACT FEB 1, 2013