STATE OF CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2014-0074 - UST

In the Matter of Underground Storage Tank Case Closure

Pursuant to Health and Safety Code Section 25299.39.2 and the Low Threat Underground Storage Tank Case Closure Policy

BY THE EXECUTIVE DIRECTOR1:

Pursuant to Health and Safety Code section 25299.39.2, the Manager of the Underground Storage Tank Cleanup Fund (Fund) recommends closure of the underground storage tank (UST) case at the site listed below.² The name of the Fund claimant, the Fund claim number, the site name and the applicable site address are as follows:

Seven Resorts, Inc. Claim No. 12577 Digger Bay Marina 15090 Digger Bay Road, Shasta Lake

Central Valley Regional Water Quality Control Board-Redding

I. STATUTORY AND PROCEDURAL BACKGROUND

Section 25299.39.2 directs the Fund manager to review the case history of claims that have been active for five years or more (five-year review), unless there is an objection from the UST owner or operator. This section further authorizes the Fund Manager to make recommendations to the State Water Resources Control Board (State Water Board) for closure of a five-year-review case if the UST owner or operator approves. In response to a recommendation by the Fund Manager, 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 action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with:

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 Health and Safety Code.

- 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.

The Fund Manager has completed a five-year 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 Review Summary Report 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 Review Summary Report.

A. 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 and 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 closure letter as specified in Health and Safety Code section 25296.10. The 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 (I)(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 closure letter or a Letter of Commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied. A Letter of Commitment has already been issued on the claim subject to this order and the respective Fund claimant, so the 365-day timeframe for the submittal of claims for corrective action costs will start upon the issuance of the closure letter.

II. FINDINGS

Based upon the UST Case Closure Review Summary Report 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:

Claim No. 12577 Digger Bay Marina

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.

The unauthorized release from the UST consisted only of petroleum. This order directs closure for the petroleum UST case at the site.

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 Board in determining that the case should be closed.

Pursuant to section 21080.5 of the Public Resources Code, environmental impacts associated with the adoption of this Order were analyzed in the substitute environmental document (SED) the State Water Board approved on May 1, 2012. The SED concludes that all environmental effects of adopting and implementing the Low threat Closure Policy are less than significant, and environmental impacts as a result of complying with the Policy are no different from the impacts that are reasonably foreseen as a result of the Policy itself. A Notice of Decision was filed August 17, 2012. No new environmental impacts or any additional reasonably foreseeable impacts beyond those that were not addressed in the SED will result from adopting this Order.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control 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 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 mediaspecific 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 closure letter, the Fund claimant 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 on page 1 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 Fund claimant 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 Financial Assistance shall issue a closure letter consistent with Health and Safety Code section 25296.10,

subdivision (g) and upload the closure letter and UST Case Closure Review Summary Report 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 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, subdivisions (a) and (b). Pursuant to section 25299.57, subdivision (I) (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 closure letter in order for the costs to be considered.
- F. Any Regional Water Board or Local Oversight Program 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 Local Oversight Program Agency directive is inconsistent with this Order.

Executive Director





State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name:	Central Valley Regional Water Quality Control Board-Redding (Regional Water Board)	Address: 364 Knollcrest Drive, Suite 200 Redding, CA 96002
Agency Casewo	orker: Melissa Buciak	Case No.: 450197

Case Information

USTCF Claim No.: 12577	GeoTracker Global ID: T0608900192
Site Name: Digger Bay Marina	Site Address: 15090 Digger Bay Road
	Shasta Lake, CA 96019`
Responsible Party: Seven Resorts, Inc.	Address: 10300 Bridge Bay Road
Attn: Bob Rollins	Redding, CA 96003
USTCF Expenditures to Date: \$320,509	Number of Years Case Open: 17

URL: http://geotracker.waterboards.ca.gov/profile report.asp?global id=T0608900192

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 meets all of the required criteria of the Policy. A summary evaluation of compliance with the 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 Case Information (Conceptual Site Model)**. Highlights of the case follow:

This case is a boat marina located on Shasta Lake. An unauthorized release was reported in March 1996 following the removal of nine USTs. Extensive excavation was performed removing an unspecified amount of contaminated soil. Pilot testing (ozone sparging) was conducted from September to November 2005 and in August 2006. Ozone sparging was again conducted from May 2008 to July 2008. Since 1999, seven groundwater monitoring wells have been installed and irregularly monitored along with three piezometers. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents except methyl tert butyl ether (MTBE) in monitoring well MW-1, and total petroleum hydrocarbons as gasoline (TPHg), benzene and MTBE in piezometer P-1.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there is one public supply well (labeled as "domestic well" on Site map) regulated by the California Department of Public Health located approximately 100 feet south and upgradient of the defined plume boundary. Water quality data in GeoTracker show that the well has not been impacted by petroleum hydrocarbons. Shasta Lake is within approximately 20 feet of the defined plume boundary. No other water supply wells have been identified within 1,000 feet of the defined

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plume boundary in files reviewed. Water is provided to water users near the Site by Digger Bay Marina. The affected groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the foreseeable future. Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting. Remaining petroleum hydrocarbon constituents are limited and stable and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

• General Criteria: The case meets all eight Policy general criteria.

- Groundwater Specific Criteria: Due to an existing water supply well and surface water body less than 250 feet of the defined plume boundary, this case does not meet Policy Criterion 1 by Class 1 through 4. However, this case meets Policy Criterion 1 by Class 5. Extensive excavation of contaminated soil has been conducted at the Site. Ozone injection also further reduced the groundwater plume. Water quality data for the upgradient public water supply well show that the well has not been impacted by the residual petroleum contamination and the residual benzene, and MTBE concentrations are below the water quality objectives for freshwater aquatic life and do not pose significant risk for recreational use. The regulatory agency determines, based on an analysis of site specific conditions, which under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment, and water quality objectives will be achieved within a reasonable time frame.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2a by Scenario 3a. The
 maximum benzene concentration in groundwater is less than 100 μg/L. The minimum depth to
 groundwater is greater than 5 feet, overlain by soil containing less than 100 mg/kg of TPH.
- Direct Contact and Outdoor Air Exposure: This case meets Policy Criterion 3b. 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.
 Extensive excavation and removal of the contaminated soil in the source area have minimized
 the direct contact and outdoor air exposure risk.

Objections to Closure and Responses

In their January 2010 case review, the Regional Water Board objects to UST case closure because:

 Closure does not fulfill the requirement of protecting the beneficial uses of the waters of the State.

RESPONSE: The case meets all Policy criteria and does not pose a significant risk to human health and the environment.

Determination

Based on the review performed in accordance with Health & Safety Code Section 25299.39.2 subdivision (a), the Fund Manager has determined that closure of the case is appropriate.

Recommendation for Closure

Based on available information, residual petroleum hydrocarbons at the Site do not pose a significant risk to human health, safety, or the environment, and the case meets the requirements of the Policy. Accordingly, the Fund Manager recommends that the case be closed. The State

Water Board is conducting public notification as required by the Policy. Shasta County has the regulatory responsibility to supervise the abandonment of monitoring wells.

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

Date

Prepared by: Mark Owens, P.E. C66804

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

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

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 site 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.	☑ Yes □ No
Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?	□ Yes ଅ No
If so, was the corrective action performed consistent with any order?	□ Yes □ No ☒ NA
General Criteria General criteria that must be satisfied by all candidate sites:	
Is the unauthorized release located within the service area of a public water system?	☑ Yes □ No
Does the unauthorized release consist only of petroleum?	☑ Yes □ No
Has the unauthorized ("primary") release from the UST system been stopped?	☑ Yes □ No
Has free product been removed to the maximum extent practicable?	□ Yes □ No ℤ NA
Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?	☑ Yes □ No

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites. http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

Has secondary source been removed to the extent practicable?	☑ Yes □ No
Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?	☑ Yes □ No
Nuisance as defined by Water Code section 13050 does not exist at the Site?	☑ Yes □ No
Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?	□ Yes ☑ No
Media-Specific Criteria Candidate sites must satisfy all three of these media-specific criteria:	9
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:	* **
Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?	☑ Yes □ No □ NA
Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?	☑ Yes □ No □ NA
If YES, check applicable class: □ 1 □ 2 □ 3 □ 4 ☑ 5 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?	□ Yes □ No ☒ NA
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.	e de la constant de l
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.	□ Yes ℤ No
 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: □ 1 □ 2 ☑ 3 □ 4 	☑Yes □ No □ NA

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?	□ Yes □ No ☒ NA
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?	□ Yes □ No ☒ NA
Th	Direct Contact and Outdoor Air Exposure: e Site is considered low-threat for direct contact and outdoor air exposure ite-specific conditions satisfy one of the three classes of sites (a through	
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)?	□ Yes □ No ☒ NA
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?	☑ Yes □ No □ NA
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?	□ Yes □ No ☒ NA

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

Site Location/History

- This case is a boat marina located on Shasta Lake at 15090 Digger Bay Road, approximately three miles north of Shasta Lake City.
- The Site has used nine USTs since operation began in the 1950's. The USTs were located in a lower parking lot above the existing boat docks.
- Site map showing the location of the former USTs, excavation areas, monitoring wells, piezometers, and MTBE concentrations is provided at the end of this closure review summary (Lawrence & Associates, May 2012).
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: March 1996.
- Status of Release: USTs removed.
- Free Product: None reported.

Tank Information

Tank No.	Size in Contents Gallons		Closed in Place/ Removed/Active	Date	
1,2	10,000	NA	Removed	03/1996	
3,4 6,000		NA	Removed	06/1999	
5 3,000		NA	Removed	03/1996	
6,7,8 2,000		NA	Removed	03/1996	
9	500	NA	Removed	03/1996	

NA: Data not available

Receptors

- GW Basin: Sacramento River.
- Beneficial Uses: The Regional Water Board Basin Plan lists Industrial, Agricultural, Municipal and Domestic Supply.
- Land Use Designation: Aerial photograph available on GeoTracker indicates recreational land use in the vicinity of the Site.
- Public Water System: Digger Bay Marina.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there is one
 public supply well regulated by the California Department of Public Health located
 approximately 100 feet south and upgradient of the defined plume boundary. No other water
 supply wells were identified within 250 feet of the defined plume boundary in the files reviewed.
- Distance to Nearest Surface Water: Shasta Lake is within approximately 20 feet of the defined plume boundary.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by fractured metavolcanic bedrock.
- Maximum Sample Depth: 92 feet below ground surface (bgs).
- Minimum Groundwater Depth: 13.64 feet bgs at monitoring well MW-3.
- Maximum Groundwater Depth: 91.95 feet bgs at monitoring well MW-5.
- Current Average Depth to Groundwater: Approximately 16 feet bgs in the shallow zone.
- Saturated Zones(s) Studied: 16 feet bgs to 100 feet bgs.
- Appropriate Screen Interval: Submerged well screens.

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Groundwater Flow Direction: Towards Shasta Lake with a gradient of 0.0051 feet/foot to 0.016 feet/foot (May 2012).

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (5/8/2012)	
MW-1	May 1999	57-72	41.09	
MW-2	November 2001	100-140	39.85	
MW-3	November 2001	60-100	15.18	
MW-4	November 2001	80-120	38.24	
MW-5	November 2001	95-135	39.98	
P-1	May 1999	35-50	17.00	
P-2	May 1999	55-70	38.43	
P-3	May 1999	58-78	40.82	

Remediation Summary

- Free Product: None reported.
- Soil Excavation: Extensive excavation of contaminated soil in the source areas, quantity unknown.
- In-Situ Soil Remediation: None reported.
- Groundwater Remediation: Pilot testing (ozone sparging) was conducted from September to November 2005 and in August 2006. Ozone sparging was conducted from May 2008 to July 2008.

Most Recent Concentrations of Petroleum Constituents in Soil *

Constituent	Maximum 0-5 feet bgs [mg/kg and (date)]	Maximum 5-10 feet bgs [mg/kg and (date)]		
Benzene	NA	NA		
Ethylbenzene	NA	NA		
Naphthalene	NA	NA		
PAHs	NA	NA		

NA: Not Analyzed, Not Applicable or Data Not Available

mg/kg: Milligrams per kilogram, parts per million

PAHs: Polycyclic aromatic hydrocarbons

^{*:} Extensive excavation and removal of contaminated soil occurred at the Site.

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Most Recent Concentrations of Petroleum Constituents in Groundwater

Sample	Sample	TPHg	Benzene	Toluene	Ethyl-	Xylenes	MTBE	TBA
	Date	(µg/L)	(µg/L)	(µg/L)	Benzene (µg/L)	(µg/L)	(µg/L)	(µg/L)
MVV-1	5/8/12	<50	<0.5	<0.5	<0.5	<1	390	<10
MVV-2	5/8/12	<50	<0.5	<0.5	<0.5	<1	<5	<10
MW-3	5/8/12	<50	<0.5	<0.5	<0.5	<1	<5	<10
MW-4	5/8/12	<50	<0.5	<0.5	<0.5	<1	<5	<10
MW-5	5/8/12	<50	<0.5	<0.5	<0.5	<1	<5	<10
P-1	5/8/12	2,000	43	<2.5	26	11	180	110
P-2	5/8/12	<50	<0.5	<0.5	<0.5	<1	<5	<10
P-3	5/8/12	<50	<0.5	<0.5	<0.5	<1	<5	<10
WQOs	N 19	5	0.15	42	29	17	5 ^a	1,200 ^b

µg/L: Micrograms per liter, parts per billion

Not detected at or above stated reporting limit TPHg: Total petroleum hydrocarbons as gasoline

MTBE: Methyl tert-butyl ether

TBA: Tert-butyl alcohol

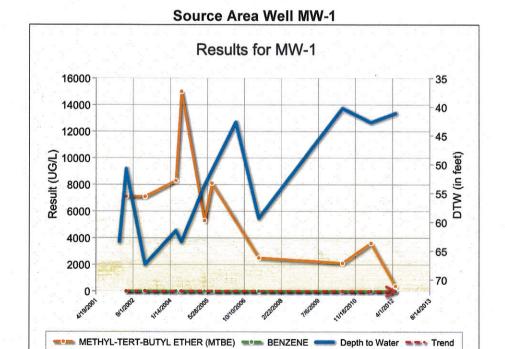
WQOs: Water Quality Objectives, Regional Water Board Basin Plan

a: Secondary maximum contaminant level (MCL)

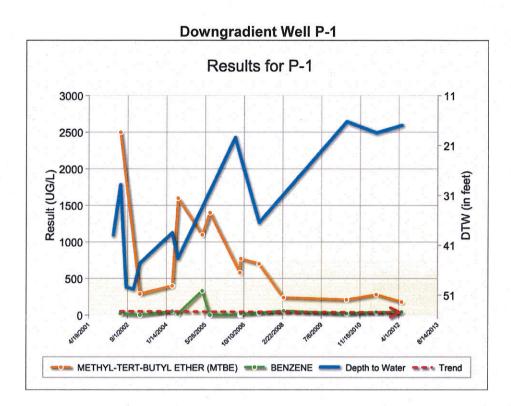
b: California Department of Public Health, Response Level

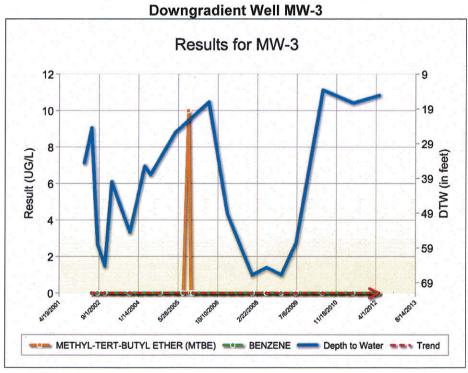
Groundwater Trends

Since 1999, five groundwater monitoring wells (along with three piezometers) have been
installed and irregularly monitored. Groundwater level exhibits large seasonal variations due to
varying lake levels and has been above the monitoring well screened intervals. Benzene and
MTBE trends are shown below in the source area well MW-1 and downgradient well MW-3:



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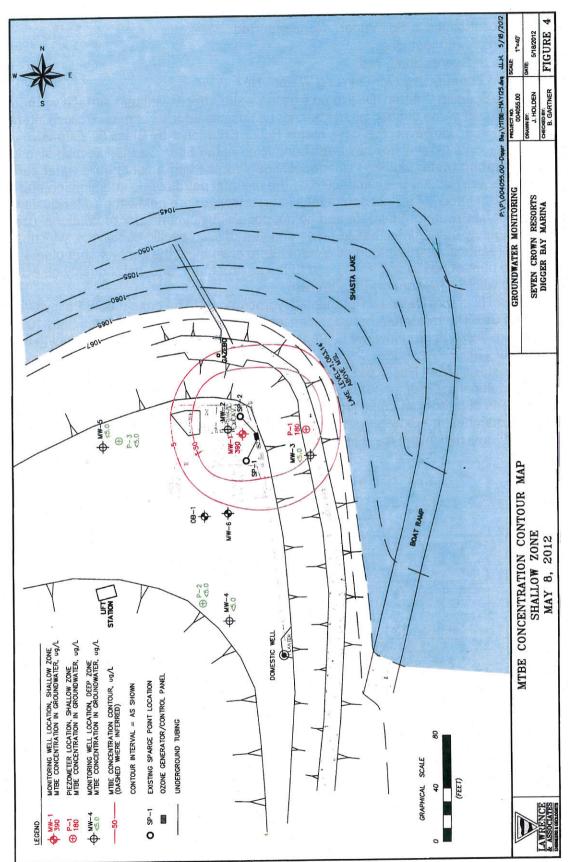


Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for methyl tert-butyl ether (MTBE): Yes, see table above.

- Oxygen Concentrations in Soil Vapor: None reported.
- Plume Length: < 250 feet long.
- Plume Stable or Decreasing: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Specific Criteria: Due to an existing water supply well and surface water body less than 250 feet of the defined plume boundary, this case does not meet Policy Criterion 1 by Class 1 through 4. However, this case meets Policy Criterion 1 by Class 5. Extensive excavation of contaminated soil has been conducted at the Site. Ozone injection also further reduced the groundwater plume. Water quality data for the upgradient public water supply well show that the well has not been impacted by the residual petroleum contamination and the residual benzene and MTBE concentrations in groundwater are below the water quality objectives for freshwater aquatic life and do not pose significant risk for recreational use. The regulatory agency determines, based on an analysis of site specific conditions, which under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment, and water quality objectives will be achieved within a reasonable time frame.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 2a by Scenario 3a. The maximum benzene concentration in groundwater is less than 100 μg/L. The minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 mg/kg of TPH.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: This case meets Policy Criterion 3b. 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. Extensive excavation and removal of the contaminated soil in the source area have minimized the direct contact and outdoor air exposure risk.

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