

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER 95-223

AMENDING ORDERS 92-037 AND 92-086 FOR:

EAST PALO ALTO INDUSTRIAL AREA  
MULTIPLE LANDOWNERS  
EAST PALO ALTO, SAN MATEO COUNTY

DISCHARGER: Dennis Sibbert

2524 PULGAS AVENUE OPERABLE UNIT (Parcel No. 063-132-210)

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board), finds that:

**BACKGROUND**

1. **SITE DESCRIPTION:** The Ravenswood Industrial Area (herein after called the Site) in the City of East Palo Alto, consists of numerous privately owned parcels or properties which are located adjacent to wetlands along the western margin of San Francisco Bay (Figure 1). These properties consist generally of agricultural, manufacturing, auto wreckers, and storage facilities. The site area has been used for agricultural and industrial purposes for at least the past 60 years.
- 1.1 **OPERABLE UNIT DESIGNATION:** The Site has been divided into Operable Units (OUs) in order to expedite investigation and cleanup and to more accurately determine responsible parties. OUs may consist of single parcels, groups of parcels or portions of parcels which have similar uses, ownership or pollution.
- 1.2 **OPERABLE UNIT DESCRIPTION AND HISTORY:** The 2524 Pulgas Avenue addressed by this Order is located on the east side of Pulgas Avenue about a half block north of Bay Road (Figure 2). The property was used for agricultural purposes prior to construction of an approximate 20,000 square foot tilt-up concrete building in the early 1960s. The interior of the building is currently divided into 5 units. The development of the property has been utilized for several light industrial purposes. The history of chemical use and disposal practices for many of the earlier tenants is unknown. The information available does indicate that heavy metals, cyanide

petroleum and solvents have been used to some degree on the property. No known releases of these chemicals have been reported.

## **REGULATORY HISTORY**

2. On April 15, 1992, the California Regional Water Quality Control Board, San Francisco Bay Region, adopted SCR Order 92-037 for several parcels in the Ravenswood Industrial Area. These parcels comprise about 70 percent of the total acreage. SCR Order 92-037 was later amended by SCR Order 92-086 to include all other properties located in the Ravenswood Industrial Area. The SCR Orders contain tasks required to evaluate if soil and/or groundwater pollution has occurred by past or present Site use activities. The Orders named each of the individual property owners as dischargers because of their current ownership of the Site properties and required they comply with all requirements for their individual parcels. Sibbert, the owner of the 2524 Pulgas Avenue OU property was named as a discharger and was required to submit a Site and Chemical Use History and Workplan for Investigation. Sibbert submitted both of these reports and implemented the approved Workplan.

## **RESULTS OF INVESTIGATION**

3. The investigation proposed in the Workplan consisted of 5 soil borings (B-1 through B-5) with samples being collected at 3 and 5 feet below surface. The samples were analyzed for TPH-D and TPH-G by EPA Method 8015 Modified and BTEX by EPA Method 8020. A portion of the samples were also analyzed for pesticides by EPA Method 8140, PCBs by EPA Method 8080, VOCs by EPA Method 8010, Cyanide by EPA Method 335.2 and LUFT metals by EPA method 6010. No detectable concentrations of petroleum hydrocarbons, PCBs, VOCs or cyanide were found in any of the soil samples. In addition, metals appear to be within the background ranges in the area.
4. Two of the borings (B-2 and B-4) were continued down to first groundwater and grab groundwater samples collected. The groundwater samples were analyzed for TPH-D and TPH-G by EPA method 8015 Modified, BTEX compounds by EPA Method 602 and VOCs by EPA Method 601. Groundwater analyzed from B-2 detected 140 ug/l of TPH in the diesel range and .9 ug/l of xylenes. No other compounds were detected in B-2. Groundwater analyzed from B-4 detected 1.6 ug/l 1,1-dichloroethane, 1.9 ug/l 1,1,1-trichloroethene and .63 ug/l trichloroethene.

## **RECOMMENDATION FOR FINAL ACTION**

5. The discharger submitted the results of the investigation performed pursuant to the

approved Workplan. No detectable concentrations of any pollutants analyzed for were detected in the five soil borings. There is no evidence of an onsite source for any of the pollutants found in groundwater at the property. The low concentrations of solvents and petroleum detected in groundwater are believed to originate from an offsite source. No further action is required for this property and the case should be closed.

## STATE BOARD RESOLUTIONS

6. State Board Resolution 68-16

On October 28, 1968, the State Board adopted Resolution No. 68-16, "Statement of Policy with Respect to Maintaining high Quality Waters in California". This policy calls for maintaining the existing high quality of State waters unless it is demonstrated that any change would be consistent with the maximum public benefit and not unreasonably affected beneficial uses. This is based on a Legislative finding, contained in section 13000, California Water Code, which states in part that it is State policy that "waters of the State shall be regulated to attain the highest water quality which is reasonable". The original discharge of wastes to the groundwater at this site is in violation of this policy.

6.1 State Board Resolution 88-63

On May 19, 1988, the State Board adopted Resolution 88-63, "Sources of Drinking Water". This resolution states that, with certain exceptions, surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic water supply.

## REGIONAL BOARD RESOLUTIONS

7. Resolution 89-39, "Incorporation of 'Sources of Drinking Water' Policy into the Water Quality Control Plan" was adopted on March 15, 1989. This policy defines groundwater as suitable or potentially suitable for municipal or domestic supply if it:

- a. has a total dissolved solids content of less than 3,000 mg/l, and
- b. is capable of producing sufficient water to supply a single well with at least 200 gallons per day.

For purposes of establishing cleanup objectives, the water bearing zones at this site qualify as potential sources of drinking water.

## **BASIN PLAN**

8. The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) on December 16, 1986 and amendments thereafter. The Basin Plan contains water quality objectives for Los Gatos Creek and South San Francisco Bay and contiguous surface waters and groundwater.
9. The existing and potential beneficial uses of the groundwater underlying and adjacent to the property include:
  - a. Industrial process water supply
  - b. Industrial service supply
  - c. Municipal and domestic supply
  - d. Agricultural supply

## **BASIS FOR AMENDMENT OF ORDER**

The Board establishes the overall cleanup level for a water body based upon the most sensitive beneficial use identified. In all cases, the Board first considers high quality or naturally occurring "background" concentration objectives as the cleanup levels for polluted groundwater with a beneficial use of municipal and domestic supply, such as at this site.

1. Based on the above findings and in consideration of the reasonable protection of beneficial uses and maximum benefit to the people of the State pursuant to State Board Resolution 68-16, remediation and groundwater monitoring are not necessary.

## **CEQA**

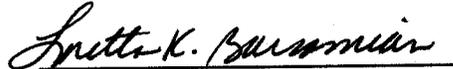
2. This action is categorically exempt from the provisions of CEQA pursuant to Section 15321 of the Resources Agency Guidelines.

## **NOTICE**

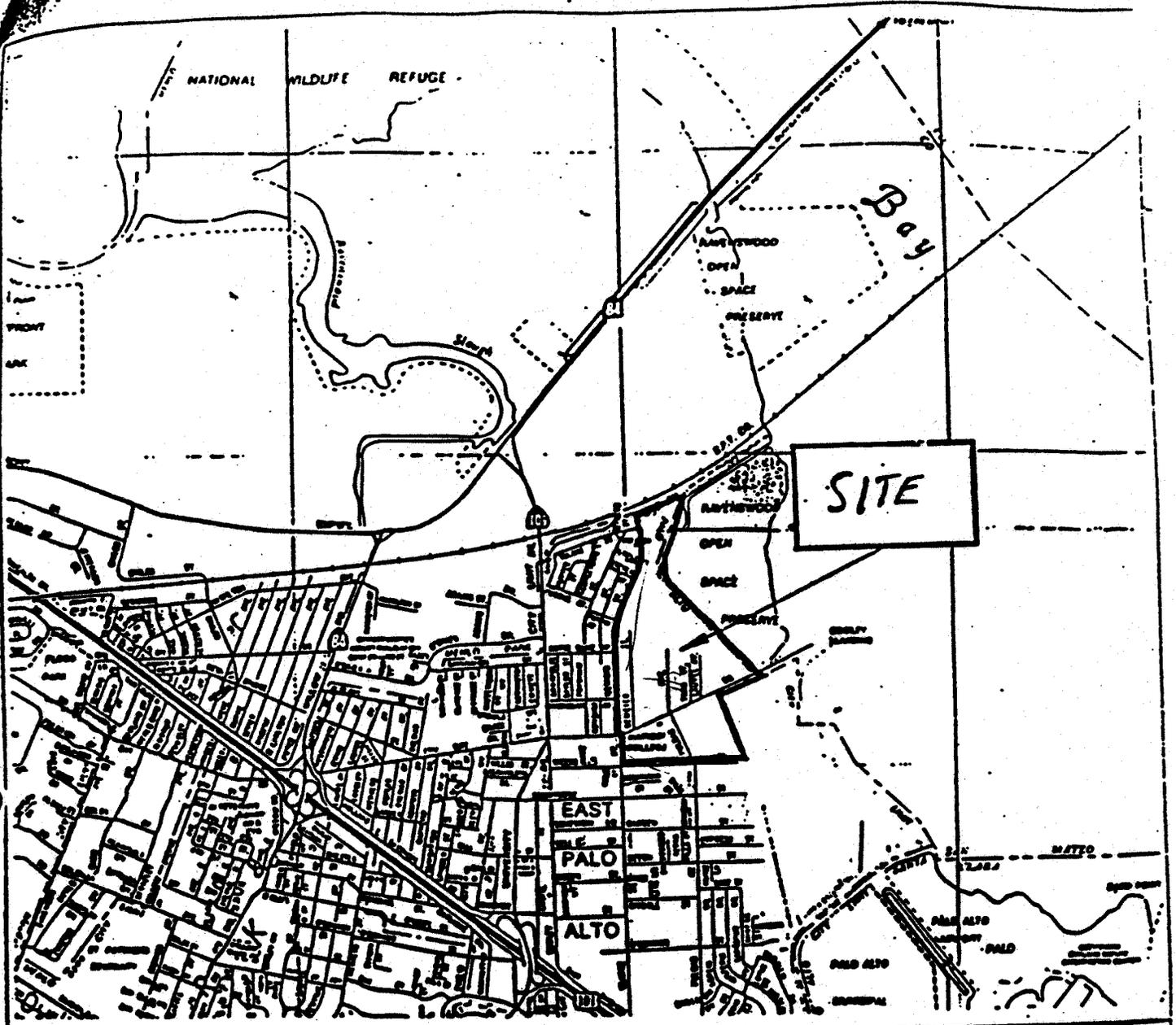
3. The Board has notified the discharger and interested agencies and persons of its intent to amend Site Cleanup Requirements for this property and has provided them with the opportunity for a public hearing and opportunity to submit their written views and recommendations.
4. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that Site Cleanup Requirements Orders 92-037 and 92-086 be amended to remove the 2524 Pulgas Avenue Operable Unit (Parcel No. 063-132-210).

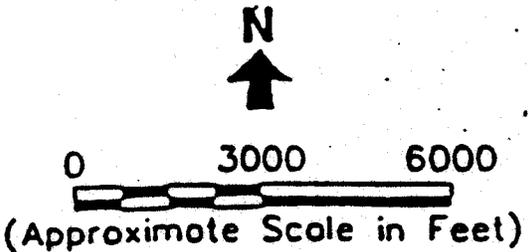
I, Loretta K. Barsamian, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on November 15, 1995.



Loretta K. Barsamian  
Executive Officer



Source: California State Automobile Association (1991)



**Erler & Kalinowski, Inc.**

Project Location Map

Notes:

- 1. All locations are approximate.

IDEA  
 East Palo Alto, CA  
 March 1993  
 EKI 920050.00  
 Figure 1



**LEGEND**

- Property Boundary
- X- Fence
- ▲ Proposed Soil Sampling Location
- ⊕ Proposed Hydropunch Sampling Location

Notes:  
1. All locations are approximate.

**Erler & Kalinowski, Inc.**

Denny Sibberl

APN 063-123-210

IDEA

East Palo Alto, CA

March 1993

EKI 920050.00

Figure 2

Pulgas Ave.

