

# County of Santa Clara

Department of Environmental Health

1555 Berger Drive, Suite 300  
San Jose, California 95112-2716  
(408) 918-3400  
www.EHinfo.org



November 8, 2013

Vivian Gomez-Latino  
State Water Resources Control Board  
1001 I Street  
P.O. Box 2231  
Sacramento, California 95812  
USTClosuresComments@waterboards.ca.gov

Subject: Proposed Low-Threat Underground Storage Tank Case Closure of Underground Storage Tank Site at Sabek Gas Station, 16270 Monterey Rd., Morgan Hill, Case No. 12-053, SCVWDID No. 09S3E28Q01f, CCRWQCB No. 3399, Global ID No. T060858682, CUF Claim No. 7291 and 7329

Dear Ms. Gomez-Latino:

The Department of Environmental Health (DEH) received your correspondence dated October 18, 2013, regarding notice of opportunity to comment and proposed case closure. This notice did not include a case closure summary or responses to our previous comments submitted for this case.

Therefore, the DEH is re-submitting our comments on why this case should not be closed.

- Please note that a Cleanup and Abatement Order 90-120 was issued to Andy Saberi/Sabek, Inc. on October 12, 1990 by the Central Coast, Regional Water Quality Control Board. For ease of reference and location, this document has been uploaded to Geotracker.
- This site is located in a groundwater recharge zone or sensitive groundwater area. Groundwater is known to fluctuate seasonally up to 20 feet due to seasonal groundwater pumping. Groundwater is actively used to supply drinking water and for agricultural irrigation. While registered water supply wells have not been identified during our reviews, it is still possible that un-registered water supply wells are located on private properties in the vicinity of the site. Private water supply wells were common in this area prior to having access to a public water system. A door to door canvass would be required to confirm the location of un-registered water supply wells on private properties.

In AEI's December 6, 2012 Low Threat Closure Request Report, it states:

- "Water levels at the site were a minimum of 25 feet lower than current levels, when the release occurred in the mid- to late- 1980s. This would have allowed horizontal migration of gasoline from the former UST hold to the MW-5 area in the currently saturated "intermediate zone"."
- "Water levels since rose "trapping" petroleum hydrocarbons in the intermediate zone between source area and MW-5."

This equates to there being secondary source still in place that is trapped beneath the upper surface of the groundwater. Note: Well MW-5 is located approximately 100 feet away from the former UST area on the adjacent property at the property line with a residence.

- The highest concentrations of contaminants in groundwater are currently reported for wells screened across the intermediate zone in wells located on the 16290 parcel (offsite restaurant property). The ozone sparging that was conducted was concentrated along the northern property boundary of the 16270 parcel with the restaurant property and on the southern portion of the restaurant property. The majority of the sparging was done into the shallow zone at depths of 33-38 ft bgs. Two deeper sparge wells were installed onsite near well MW2R (46.5-60 ft bgs) in November 2007, but were not connected to the system. Efforts to remediate the intermediate zone on the restaurant property have not been attempted.

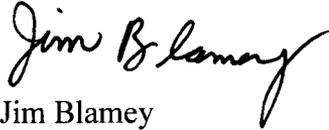
The groundwater contamination plume is oriented northeasterly from the former tank excavation towards well MW-5. Well MW-5 is located along the northeasterly property boundary with residential properties. The groundwater flow in the shallow zone is reported to be northwesterly and in the intermediate zone to the west-southwest and in the deeper zone to the southeast. It should be noted that the groundwater contamination plume orientation is not consistent with any of the groundwater flow directions and migration may have been based on preferential pathways when groundwater was deeper at the site.

- The ozone sparge system at the site was shut down on March 28, 2011. In January 2013, we reviewed this case against the LTCP and found that it still did not meet the criteria even after completing the verification monitoring of groundwater following cessation of remediation. Groundwater was most recently sampled in March 2013. At that time maximum concentrations in groundwater were reported of 130,000 parts per billion (ppb) Total Petroleum Hydrocarbons (TPH) as Gasoline (TPHg) and 17,000 ppb Benzene in well MW21, which is an intermediate zone well. Note that other constituents were detected and are not listed here.
- Well MW21 was installed in 2011 and has been sampled five times. Concentrations of contaminants in this well have increased since 2011. This well is located on the restaurant property near the property line with a residential structure. And again, based on plume morphology, there are no wells further northeast of well MW21 in the direction of the residence. The concentrations of contaminants remaining in this well are significant and the intermediate zone of groundwater has not been remediated.

Ms. Gomez-Latino  
November 8, 2013  
Page 3 of 3

If you have any questions, please contact our caseworker Ms. Lani Lee at (408) 918-1977.

Sincerely,



Jim Blamey  
Director

cc: Chris Adair, Central Coast Regional Water Quality Control Board  
([Cadair@waterboards.ca.gov](mailto:Cadair@waterboards.ca.gov))  
Wei Liu, Central Coast Regional Water Quality Control Board  
([Wei.Liu@waterboards.ca.gov](mailto:Wei.Liu@waterboards.ca.gov))  
George Cook, Groundwater Monitoring and Analysis Unit, Santa Clara Valley Water  
District ([gcook@valleywater.org](mailto:gcook@valleywater.org))  
File