

APPENDIX D

NFA Letter for Agricultural Repair Shop USTs





California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair



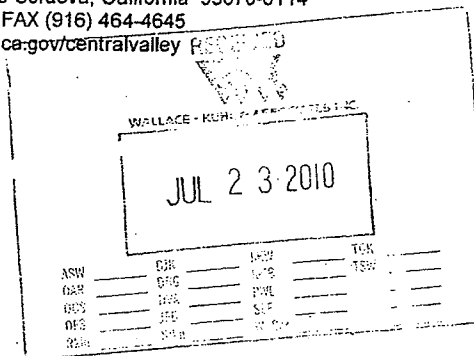
Linda S. Adams
Secretary for
Environmental
Protection

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114
Phone (916) 464-3291 • FAX (916) 464-4645
<http://www.waterboards.ca.gov/centralvalley>

Arnold
Schwarzenegger
Governor

16 July 2010

Mr. Ryan Nakkèn
Clark Pacific
1980 South River Road
West Sacramento, California 95691



NO FURTHER ACTION REQUIRED, FORMER UNDERGROUND STORAGE TANKS, FORMER SPRECKELS AGRICULTURAL REPAIR SHOP, 40600 COUNTY ROAD 18C, WOODLAND, YOLO COUNTY (LUSTIS NO. 570342)

This letter confirms the completion of a site investigation and corrective action for the former underground storage tanks system at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the underground storage tanks are greatly appreciated.

Based on the information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your former underground storage tanks site is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to Section 25299.3 of the Health and Safety Code and that no further action related to the petroleum release(s) at the site is required.

This notice is issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code.

Please contact Mr. David Stavarek at (916) 464-4673, or by e-mail at dstavarek@waterboards.ca.gov if you have any questions regarding this matter.

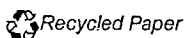
PAMELA C. CREEDON
Executive Officer

Enclosures (Memorandum and NFAR Checklist)

cc w/encs.: Mr. Mark Owens, SWRCB, UST Cleanup Fund, Sacramento
Ms. Barbara Rinker, SWRCB, UST Cleanup Fund, Sacramento
Mr. Jeff Pinnow, Yolo County Environmental Health Services, Woodland
Ms. Mari O'Brien, Wallace-Kuhl & Associates, Inc., West Sacramento

dfslc:\proj\570342\LN FAR

California Environmental Protection Agency





California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair



Linda S. Adams
Secretary for
Environmental
Protection

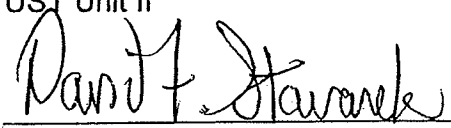
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Arnold
Schwarzenegger
Governor

TO: Jim Munch, P.E.
Senior Engineer
UST Program

FROM: David Stavarek, P.G.
Engineering Geologist
UST Unit II

DATE: 11 January 2010
Updated 7 July 2010

SIGNATURE: 

SUBJECT: **NO FURTHER ACTION REQUIRED, FORMER SPRECKELS SUGAR PLANT
AGRICULTURAL REPAIR SHOP, 40600 COUNTY ROAD 18C, WOODLAND,
YOLO COUNTY (LUSTIS NO. 570342)**

I reviewed our case file and the 29 May 2009 *Subsurface Investigation Report of Findings and No Further Action Request (Report)*, prepared by Wallace-Kuhl & Associates, Inc. (WKA) on behalf of the Responsible Party and current property owner, Reverse Exchange Properties Inc./Clark Pacific. Following is a summary and my comments regarding this case and the criteria for issuing a No Further Action Required (NFAR) letter. See attached copy of WKA's Figures 1, 2, and 3 for location of site, site features, borings, and monitoring wells.

BACKGROUND

The Former Agricultural Repair Shop (FAGRS) area is an approximately 150 by 260 feet area near the center of the Former Spreckels Sugar Plant. The Former Spreckels Sugar Plant operated as a sugar processing facility from 1936 until 1996. In 2002, the property was sold to Sugarland Farms LLC, and then in 2008 to Reverse Exchange Properties Inc. Clark Pacific concrete products currently occupies the Former Spreckels Sugar Plant, but they have shut down operations at this location.

The FAGRS is currently a dirt covered area with a beet seed warehouse, a mechanical repair shop building, and a vehicle wash rack. WKA indicated in a 2008 Phase I Environmental Site Assessment report that three underground storage tanks were removed from the site in 1988 under permit from Yolo County Environmental Health Services (YCEHS). The three USTs consisted of an 8,000-gallon regular gasoline tank, 6,000-gallon unleaded gasoline tank, and 1,200-gallon waste oil tank; there were no records of when the USTs were installed nor at the time of their removal.

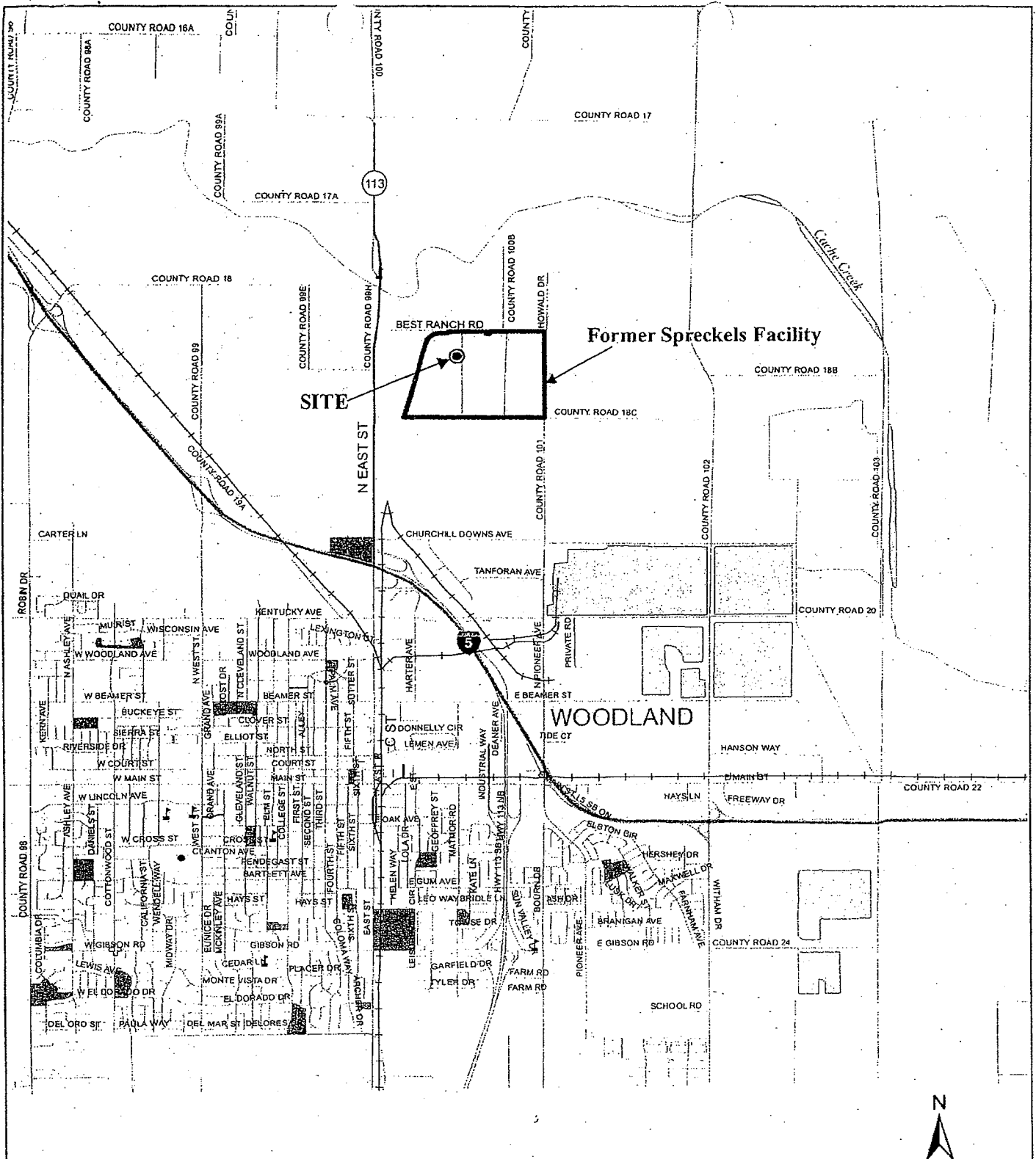
INVESTIGATIONS

A total of 12 borings, monitoring wells were installed in four of the borings, have been used to investigate the soil and groundwater beneath the FAGRS area since December 2007. Soil results indicated 2.1, 1.9, 1.2, 6.5, and 1.2 milligrams per kilogram of total petroleum hydrocarbon as diesel (TPHd) 21, 20.5, 18, 14, and 21 feet below ground surface (bgs), respectively, in soil beneath the FAGRS area. Gasoline hydrocarbons including oxygenates,

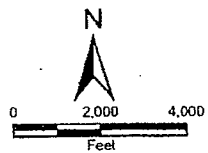
California Environmental Protection Agency

groundwater monitoring wells surrounding the grab sample locations were non-detect for all constituents. As indicated above, the laboratory indicated that diesel hydrocarbons detected (in the grab samples) were higher boiling point than typical diesel. Further, the grab groundwater samples were also subject to a result of mixed media (soil and water) interference and were not as representative of actual groundwater conditions, as were the installed monitoring wells. As such, the heavier hydrocarbons present in groundwater do not pose a threat to water quality and human health. All groundwater monitoring wells were properly abandoned on 13 and 14 May 2010. It was estimated that approximately three pounds of TPH remain in soil and 0.13 pounds in groundwater, and this TPH will continue to degrade over time.

All appropriate documents have been submitted to Geotracker, and the Yolo County Environmental Health Service and the current property owner have no concerns regarding case closure. As such, I concur with WKA's and Reverse Exchange Properties Inc./Clark Pacific's request for closure, and recommend that a NFAR letter be issued for closure of this case.

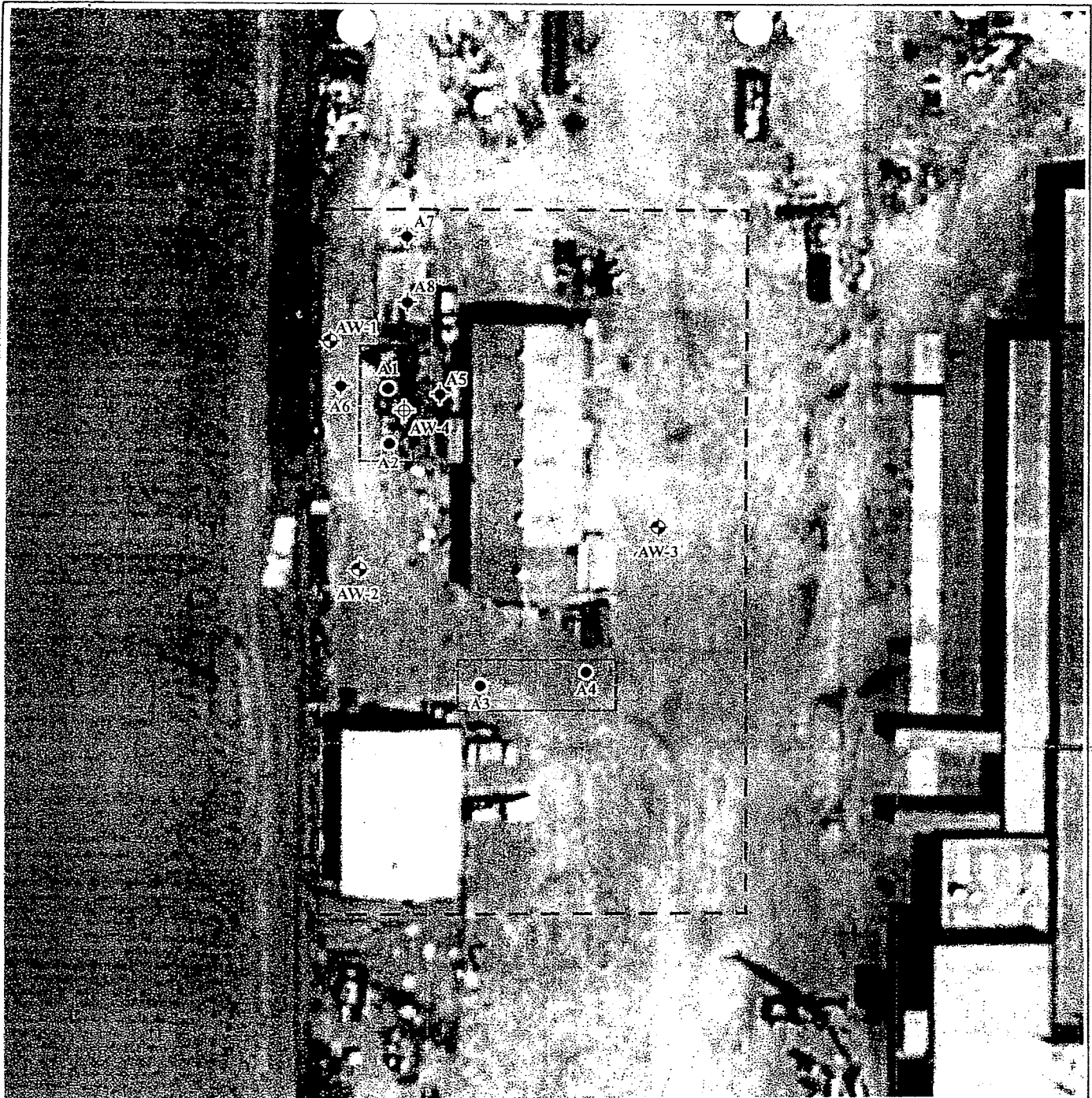


Adapted from Data Provided By Yolo County, 2007
 Projection: NAD 83, California State Plane, Zone 11



VICINITY MAP
FORMER SPRECKELS SUGAR FACILITY
AGRICULTURAL REPAIR SHOP AREA
 Woodland, California

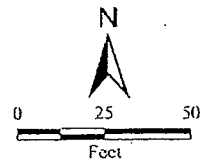
FIGURE 1	
DRAWN BY	TJC
CHECKED BY	MOB
PROJECT MGR	SA
DATE	5/09
WKA NO. 7864.13	



Projection: NAD 83, California State Plane, Zone II

LEGEND

- ⊕ Deep monitoring well
- ⊙ Shallow monitoring well
- Approximate soil boring location (December 14, 2007)
- ◆ Approximate soil boring location (February 11, 2008)
- Potential former tank location
- - - Site boundary



SITE PLAN
FORMER SPRECKELS SUGAR FACILITY
AGRICULTURAL REPAIR SHOP UST AREA
 Woodland, California

FIGURE 3	
DRAWN BY	TJC
CHECKED BY	MOB
PROJECT MGR	SAA
DATE	5/09
WKA NO. 7864.13	

TABLE 2
 Summary of Hydrocarbon Analytical Results for Grab Groundwater Samples collected on December 13, 14, & 17, 2007
 Concentrations reported in micrograms per liter (ug/L)

Sample Designation	Sample Date	EPA 8015V				EPA 8260B					
		TPHd		TPHmo		TPHg	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE
		w/o silica gel	w/ silica gel	w/o silica gel	w/ silica gel						
A-1	12/17/2007	960	440	2200	2100	<50	<0.50	<0.50	<0.50	<0.50	<0.50
A-2	12/17/2007	76	<50	<100	n.a.	<50	<0.50	<0.50	<0.50	0.61	<0.50
A-3	12/14/2007	62	<50	160	<100	<50	<0.50	<0.50	<0.50	<0.50	<0.50
A-4	12/13/2007	68	<50	<100	n.a.	<50	<0.50	1.5	<0.50	<0.50	<0.50
A5	2/11/2008	210	110	590	320	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
A6	2/11/2008	2300	1200	12000	10000	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
A7	2/11/2008	110	<50	<100	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
A8	2/11/2008	110	<50	<100	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
ESL		640	640	640	640	26	0.0362	63	420	150	4

Notes:

- TPHd = Total Petroleum Hydrocarbons-as-Diesel
- TPHmo = Total Petroleum Hydrocarbons-as-motor-oil
- TPHg = Total Petroleum Hydrocarbons-as-gasoline
- MTBE = Methyl-tert-Butyl Ether
- ESL = Environmental Screening Level as set by San Francisco Bay Regional Water Quality Control Board
- n.a. = not analyzed

**TABLE 4
GROUNDWATER ANALYTICAL RESULTS
HYDROCARBONS AND ADDITIVES
Former Spreckels Agricultural Repair Shop UST Area
40600 County Road 18C
Woodland, California
WKA No. 7864.13**

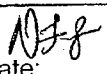
Concentrations reported in micrograms per liter (µg/L)

SAMPLE DATA		EPA 8015M	EPA 8260B																		
Sample Designation	Date Sampled	TPHd	TPHg	Benzene	n-Butylbenzene	sec-Butylbenzene	tert-Butylbenzene	Isopropyl benzene	Toluene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Ethylbenzene	Total Xylenes	MTBE	DIPE	ETBE	TAME	tert-Butanol	1,2-Dibromoethane	1,2-Dichloroethane	
AW1	2/25/2009	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
AW2	2/25/2009	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
AW3	2/25/2009	<50	<50	<0.50	na	na	na	na	<0.50	na	na	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	na	na
AW4	2/25/2009	<50	<50	<0.50	na	na	na	na	<0.50	na	na	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	na	na
Water Quality Numerical Limits																					
California Primary MCL				1.0					150			300	1750	0.4					1000	0.5	
California Public Health Goal (OEHHA)				0.15					150	330	330	300	1800	0.13					100	0.04	0.4
Amore and Hantala Applied Tox Vol 3, No. 6, 1983				170				0.8		15	15				0.8			290,000		7,000	
California Drinking Water Action Level					260	260	260														
Federal Register, Vol 54, No. 97, pp. 22138-22139									42			29	70								
USEPA IRIS Reference Dose								700													
USEPA Superfund Provisional Reference Dose		56-140																			
Taste and Odor Threshold from USEPA Health Advisory		100																			
USEPA Superfund Provisional Cancer Slope Factor			2																		
McKee & Wolf Water Quality Criteria SWRCB # 230																					
California Secondary MCL																					

Notes:
 USEPA or EPA = United States Environmental Protection Agency
 TPHd = Total petroleum hydrocarbons-as-diesel
 TPHg = Total petroleum hydrocarbons-as-gasoline
 MTBE = Methyl-tert-butyl ether
 DIPE = Diisopropyl ether
 ETBE = Ethyl-tert-butyl ether
 TAME = Tert-amyl methyl ether

Water Quality Numerical Limits per the Tri-Regional Appendix A
 MCL = Maximum Contaminant Level
 OEHHA = Office of Environmental Health Hazard Assessment
 IRIS = Integrated Risk Information System
 SWRCB = State Water Resources Control Board
 na = not analyzed

**TABLE 1 - CHECKLIST OF REQUIRED DATA
FOR NO FURTHER ACTION REQUESTS AT UNDERGROUND STORAGE TANK SITES**

Site Name and Location:		Former Spreckels Sugar Ag Shop, 40600 Co. Rd. 18C, Woodland, Yolo County	
<input checked="" type="checkbox"/>	1. Distance to production wells for municipal, domestic, agriculture, industry and other uses within 2000 feet of the site;	Five water supply wells within 2,000 feet of site, but petroleum hydrocarbons are largely non-detect beneath the site, therefore, no threat to supply wells.	
<input checked="" type="checkbox"/>	2. Site maps, to scale, of area impacted showing locations of former and existing tank systems, excavation contours and sample locations, borings and monitoring wells elevation contours, gradients, and nearby surface waters, buildings, streets, and subsurface utilities;	Yes, see reports; 24 Jan 2008, 28 Feb 2008, and 29 May 09.	
<input checked="" type="checkbox"/>	3. Figures depicting lithology (cross section), treatment system diagrams;	Yes, see Reports listed in item 2.	
<input checked="" type="checkbox"/>	4. Stockpiled soil remaining on-site or off-site disposal (quantity);	No, no Soil from UST work onsite.	
<input checked="" type="checkbox"/>	5. Monitoring wells remaining on-site, fate;	No, all 4 groundwater monitoring wells destroyed by 13 and 14 May 2010.	
<input checked="" type="checkbox"/>	6. Tabulated results of all groundwater elevations and depths to water;	Yes, see 29 May 2009 Report.	
<input checked="" type="checkbox"/>	7. Tabulated results of all sampling and analyses:	See 29 May 09 report and others listed in item 2.	
<input checked="" type="checkbox"/>	Detection limits for confirmation sampling		
<input checked="" type="checkbox"/>	Lead analyses		
<input checked="" type="checkbox"/>	8. Concentration contours of contaminants found and those remaining in soil and groundwater, and both on-site and off-site:	See reports listed in item 2.	
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Lateral and <input checked="" type="checkbox"/> Vertical extent of soil contamination		
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Lateral and <input checked="" type="checkbox"/> Vertical extent of groundwater contamination		
<input type="checkbox"/>	9. Zone of influence calculated and assumptions used for subsurface remediation system and the zone of capture attained for the soil and groundwater remediation system;	No active remediation.	
<input checked="" type="checkbox"/>	10. Reports / information	<input checked="" type="checkbox"/> Unauthorized Release Form	<input checked="" type="checkbox"/> QMRs see reports 1989 through 2009
	<input checked="" type="checkbox"/> Well and boring logs	<input type="checkbox"/> PAR	<input type="checkbox"/> FRP <input checked="" type="checkbox"/> Other
<input checked="" type="checkbox"/>	11. Best Available Technology (BAT) used or an explanation for not using BAT;	UST removal and natural attenuation.	
<input checked="" type="checkbox"/>	12. Reasons why background was/is unattainable using BAT;	Petroleum hydrocarbons largely non-detect in soil and groundwater, natural attenuation has degraded residual hydrocarbons.	
<input type="checkbox"/>	13. Mass balance calculation of substance treated versus that remaining;	Concentrations detected indicates no mass remaining in subsurface see report 29 May 09.	
<input type="checkbox"/>	14. Assumptions, parameters, calculations and model used in risk assessments, and fate and transport modeling;	See 29 May 2009 Report for Site Closure.	
<input checked="" type="checkbox"/>	15. Rationale why conditions remaining at site will not adversely impact water quality, health, or other beneficial uses.	Petroleum hydrocarbons left are largely non-detect	
<input type="checkbox"/>	16. WET or TCLP results	See reports	
By: DFS	Comments: In 1988 a 1,200-gal waste oil, 8,000-gal and 6,000-gal gasoline USTs were removed. Initial investigations in December 2007 and February 2008 indicated low concentrations of petroleum hydrocarbons. Subsequent soil and groundwater investigations indicated no apparent threat to groundwater or human health. Therefore, all monitoring wells were destroyed on 13 and 14 May 2010, and documents entered into Geotracker, therefore, closure is warranted.		
Date:  8 July 2010			

YOLO COUNTY ENVIRONMENTAL HEALTH
 UNDERGROUND STORAGE TANK
 PERMIT TO OPERATE APPLICATION

DEC 2 - 1988

Owner: Amstar Corporation, Spreckels Sugar Division

Mailing Address: P.O. Box 2240

City: Woodland State: California Zip: 95695

Facility Name: Spreckels Sugar Factory 3

Address: County Road 18C

City: Woodland

Number of Tanks Active: 6 inactive: 0

Please indicate which monitoring alternative (1-7) will be used for each tank:

Container No.	Capacity	Location	Contents	Monitoring Alternative
201Q-1	5,000 gal.	Farm	diesel	exempt status ¹⁷ REMOVED 8- 27 87
201Q-2	1,000 gal.	Farm	diesel	exempt status REMOVED 8-14-87
542Q-1	1,000 gal.	Maint.	reg. gas	#5 REMOVED 8-17-87
417Q-1	8,000 gal.	Ag shop	reg. gas	#5 - Abandoned 10/21/88 (Removed)
417Q-2	6,000 gal.	Ag shop	unleaded gas	#5 - Abandoned 10/21/88 (Removed)
417Q-3	1,200 gal.	Ag shop	waste oil	request closure permit - Abandoned 10/21/88 (Removed)

"This information is true to the best of my knowledge."

"These tanks have been registered with the State Water Resources Control Board."

Signature: Joan F. Woerner

Date: 11-27-85

Print Name: Joan F. Woerner

Title: Industrial Relations Mgr.

Phone: (916)662-3261

NOTE: TANK NO 7 WAS FOUND DURING AUG 1987 REMOVALS
 THIS TANK WAS FULL OF WASTE OIL. THE OIL WAS
 REMOVED BY A LICENSED RECYCLER AND THE TANK
 REMOVED. NO EVIDENCE OF CONTAMINATION OBSERVED

JWA
 9/24/87