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SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Central Valley Regional Water Quality Control Board

18 June 2013

Jaswinder Shergill  
Hardip Singh Sandhu  
420 Alamo Avenue  
Weed, CA 96094

### REQUEST FOR WORK PLAN AS DIRECTED BY STATE WATER RESOURCES CONTROL BOARD RESOLUTION 2012-0016, UST CASE #450240, PAYLESS GAS & FOOD MART, 3440 SOUTH MARKET STREET, REDDING, SHASTA COUNTY

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has reviewed your UST case for potential closure as directed by:

1. State Water Resources Control Board (State Board) Resolution No. 2012-0016, Approve a Substitute Environmental Document and Adopt a Proposed Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closure, adopted 1 May 2012.  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2012/rs2012\\_0016.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016.pdf)
2. State Board Resolution No. 2012-0062, Directing Additional Actions to Improve the Underground Storage Tank Cleanup Program, adopted 6 November 2012.  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2012/rs2012\\_0062.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0062.pdf)

And in accordance with:

1. Low-Threat Underground Storage Tank Case Closure Policy (Low-Threat Closure Policy)  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2012/rs2012\\_0016atta.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf)
2. Plan for Implementation of Low-Threat Underground Storage Tank Case Closure Policy and Additional Program Improvements  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2012/110612\\_6\\_final\\_cp%20imp%20plan.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/110612_6_final_cp%20imp%20plan.pdf)

These Resolutions, in part, direct the Central Valley Water Board to review all cases in the petroleum UST Cleanup Program using the framework provided in the Low-Threat Closure Policy no later than 16 August 2013. These case reviews shall, at a minimum, include the following for each UST case:

- a. Determination of whether or not each UST case meets the criteria in the Low-Threat Closure Policy or is otherwise appropriate for closure based on a site-specific analysis. Documentation of this determination in GeoTracker is required if the case is not closed by 16 August 2013; and

- b. If the case does not satisfy the criteria in the Low-Threat Closure Policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified using the "Online Checklist" in GeoTracker, which is publically available on the State Water Board's web site.

Central Valley Water Board staff has reviewed your UST case for potential closure in accordance with the above-mentioned Resolutions and Policies. Based on this review, staff has determined that your case does not meet closure criteria as provided in the Low-Threat Closure Policy. The following issues, *those indicated by checkmarks*, impede case closure:

**General Criteria:**

- ✓ You have not removed the secondary source to the extent practicable. Secondary source means petroleum-impacted soil or groundwater directly under the point of release.

**Media-Specific Criteria: Groundwater**

- ✓ The portion of your contaminant plume that exceeds water quality objectives appears to be stable or decreasing in areal extent, and is less than (<) 250 feet in length. However, the plume either includes free product, is less than (<) 1,000 feet from the nearest water supply well or surface water body, or has dissolved Benzene >3,000 micrograms/Liter ( $\mu\text{g/L}$ ) or MtBE >1,000  $\mu\text{g/L}$ .
- ✓ We cannot determine based on site-specific conditions whether or not under current and reasonably anticipated near term future land uses that the contaminant plume would pose low threat to human health and safety and the environment, and groundwater would meet water quality objectives in a reasonable timeframe.

**Media-Specific Criteria: Outdoor Air and Direct Contact**

- ✓ Petroleum in shallow soils potentially threatens human health. Your site could adversely affect commercial/industrial human health due to direct exposure to newly exposed soils less than (<) 5 feet below grade surface with either Benzene greater than (>) 8.2 milligrams/Kilogram (mg/Kg), Ethylbenzene >89 mg/Kg, Naphthalene >45 mg/Kg, or poly-aromatic hydrocarbons >0.63 mg/Kg. You have not demonstrated either with a case-specific risk assessment or appropriate mitigation measures that petroleum does not pose a potential human health risk.

Therefore, we request a single work plan to address all of the above identified issues be submitted to this office **no later than 5 July 2013**. This work plan will serve as the Path to Closure and shall contain milestone dates by calendar quarter, which will achieve site cleanup as required by State Water Board Resolution No. 2012-0062 and the Low Threat Closure Policy.

Jaswinder Shergill  
Hardip Singh Sandhu

- 3 -

18 June 2013

A qualified, California Professional Engineer or Geologist should sign and stamp the plan. Please contact me at (530) 224-4854, mbuciak@waterboards.ca.gov, or the footer address with questions or comments.



Melissa Buciak  
Engineering Geologist  
Groundwater Unit

MAB:lmw

cc: Mr. Kevin Westlake, Shasta County Environmental Health Division, Redding  
Mr. Mark Chaney, SHN Consulting Engineers & Geologists, Inc., Redding

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