

Santa Ana Regional Water Quality Control Board

UNDERGROUND STORAGE TANK (UST) CASE CLOSURE SUMMARY

Agency Information

Agency Name: Santa Ana Regional Water Quality Control Board (Santa Ana Water Board)	Address: 3737 Main Street, Suite 500 Riverside, CA 92501
Agency Caseworker: Miguel Oviedo	Case No.: 083003821T

Case Information

UST Cleanup Fund (Fund) Claim No.: 21253	Global ID: T0601993712
Site Name: Former Texaco/Burger King	Site Address: 2751 W. Orangethorpe Avenue Fullerton, CA 92833 (Site)
Responsible Party: Chevron Environmental Management Company Attention: James Beacom	Address: 5001 Executive Parkway BR2600 L3W San Ramon, CA 94583
Fund Expenditures to Date: \$0	Number of Years Case Open: 21

GeoTracker Case Record: <https://geotracker.waterboards.ca.gov/?gid=T0601993712>

Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy because they pose a low threat to human health, safety, and the environment. The Site meets all of the required criteria of the Policy and therefore, is subject to closure.

The Site operated as a commercial fueling facility between 1956 and 1978. In 1975, an unauthorized release from a UST was discovered, and the tank was removed and replaced. In 1978, a total of five USTs of unknown sizes were removed from the Site and fueling operations ceased. On May 23, 2000, Ramazan Construction and Environmental Company submitted the *Assessment of Underground Sampling report*, summarizing a Phase II Environmental Site Assessment (ESA). As part of the Phase II ESA, soil samples were collected and analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and

xylenes (collectively, BTEX), and methyl tert-butyl ether (MTBE). Soil sample analytical results confirmed petroleum hydrocarbon impacts to subsurface soils in close proximity to groundwater.

The primary chemicals of concern (COCs) in the soil and groundwater are TPHg, TPH as diesel (TPHd), BTEX, and naphthalene. The highest measured soil concentrations for COCs were found in soil boring SB-9/MW-1 at 16 feet below ground surface (bgs). Subsequent samples analyzed at 18 feet bgs had low or non-detect levels of the same COCs. Other volatile organic compounds (VOCs) measured in soil were below the environmental screening levels published in the San Francisco Bay Regional Water Quality Control Board's *Environmental Screening Levels* (ESLs) for Commercial/Industrial: Shallow Soil Exposure (Rev 3, 2025).

From July 2016 through September 2017, groundwater monitoring and sampling were performed using wells MW-1 and MW-2. Well MW-3 was installed with MW-1 and MW-2, but it could not be sampled because it was dry. In December 2023, MW-3A and MW-4 were installed, and groundwater monitoring and sampling resumed through August 2024, utilizing wells MW-1, MW-2, MW-3A, and MW-4.

The contaminant plume is calculated to measure less than 250 feet long. Concentrations of COCs have historically decreased or remained stable. Concentrations of TPHg have decreased over time from a historical high of 1,200,000 micrograms per liter ($\mu\text{g/L}$) to 7,450 $\mu\text{g/L}$, benzene from 278 $\mu\text{g/L}$ to 234 $\mu\text{g/L}$, ethylbenzene from 6,200 to 742 $\mu\text{g/L}$, and naphthalene from 410 $\mu\text{g/L}$ to 71.4 $\mu\text{g/L}$. The closest active public drinking water supply well is 2,900 ft southwest and cross-gradient of the Site. It is improbable that remaining COC concentrations will impact the drinking water supply and therefore, poses a low risk to human health and the environment.

Remaining petroleum constituents are limited, stable, and decreasing. Additional assessment would be unnecessary and will not likely change the conceptual model. Any remaining petroleum constituents do not pose significant risk to human health, safety, or the environment under current conditions.

Rationale for Closure Under the Policy

- **General Criteria** – Site **MEETS ALL EIGHT GENERAL CRITERIA** under the Policy.
- **Groundwater Media-Specific Criteria** – Site meets **Criteria 5**. The regulatory agency determines, based on an analysis of site-specific conditions that 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.
 - BIOSCREEN Modeling was used to calculate the length of the benzene contaminant plume in the downgradient direction beyond well MW-3A. The model calculation applied a 30-year period with low and high hydraulic conductivity scenarios and soil data from Site assessment/characterization work. The result estimated plume lengths range between 40 and 225 feet from the source area with no further plume migration.
 - The contaminant plume is not defined in the downgradient direction, and the plume length may exceed the 100-foot length to satisfy Class 1. The highest

concentrations of TPHg and benzene were measured in the most downgradient well, MW-3A. However, the plume that exceeds water quality objectives is not expected to be greater than 1,000 feet in length and remain stable due to the concentrations observed.

- The Site was evaluated against Criteria 4 due to the estimated plume length being less than 1,000 feet, benzene concentrations have consistently measured less than 1,000 µg/L, and MTBE concentrations have historically not been measured above laboratory detection limits. Free product has never been measured in the Site's groundwater monitoring wells. However, there is a concrete-lined channel located approximately 450 feet upgradient of the Site, which disqualifies it from satisfying Criteria 4. Additionally, upgradient wells MW-1 and MW-2 have shown very low or non-detect concentrations of COCs and define the plume boundary in the upgradient and cross gradient directions. The contaminant plume is believed to not pose a threat to the upgradient concrete-lined stormwater channel Site.
 - Considering the Site conditions described above, and the contaminant plume not posing a threat to the upgradient concrete-lined channel, the Santa Ana Water Board determines the case meets Criteria 5.
- **Petroleum Vapor Intrusion to Indoor Air – Site meets Criteria 2 (a), Scenario 4.** The concentrations of benzene, ethylbenzene, and naphthalene in soil gas are less than the Policy limits as it applies to the bioattenuation zone, land use, and existing or planned future building structures at the Site.
 - Direct measurement of soil vapor concentrations showed benzene, ethylbenzene, and naphthalene concentrations were below those listed in Scenario 4 tables with or without a bioattenuation zone. Oxygen concentrations in soil vapor samples were measured at 15% or higher. TPH concentrations in the top 5 feet of soil measured less than 100 milligrams per kilogram (mg/kg) throughout the Site.
 - **Direct Contact and Outdoor Air Exposure – Site meets Criteria 3 (a).** Maximum concentrations of petroleum constituents in soil from confirmation soil samples are less than or equal to those listed in Table 1 of the Policy.
 - Soil concentrations of benzene, ethylbenzene, naphthalene, and poly-aromatic hydrocarbons between 0 to 5 feet bgs and 5 to 10 feet bgs were measured below those listed in Table 1 for Commercial/Industrial use.

Recommendation for Closure

The corrective action performed at this Site ensures the protection of human health, safety, and the environment. The corrective action performed at this Site is consistent with chapter 6.7 of division 20 of the Health and Safety Code, implementing regulations, applicable state policies for water quality control and applicable water quality control plans. Case closure is recommended.

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