

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ORDER NO. R2-2020-XXXX

RESCISSION OF SITE CLEANUP REQUIREMENTS ORDER NO. 00-053 for:

SHORE TERMINALS, LLC RICHMOND TERMINAL

for the property located at:

**488 WRIGHT AVENUE, RICHMOND,
CONTRA COSTA COUNTY, CALIFORNIA**

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

SITE DESCRIPTION AND DISCHARGERS

1. TransMontaigne Operating Partnership, LLC, (hereinafter called the Discharger) presently owns and operates the Richmond Terminal Facility (Facility). The Facility has been used as a bulk fuel storage facility since approximately 1951. The 9-acre Facility is located at 488 Wright Avenue at the City of Richmond's inner harbor (Figure 1). Wright Avenue is to the north, Santa Fe Channel and Lauritzen Channel adjoins the property on the west, Harbor Channel abuts to the south, and Parr-Rich Canal is directly to the east.
2. Pursuant to the Agreement and Purchase of Sale on January 1, 2018, TransMontaigne became the responsible party as defined in California Code of Regulations Title 23, Division 3, Chapter 16, Article 11. Plains Products Terminals, LLC owned and operated the Facility from 2005 through December 2017. Prior to Plains' ownership, Shore Terminals owned and operated the Facility from 1998 to 2005; Time Oil Company from 1986 to 1998. Shore Terminals, LLC was named as the Discharger on Order No. 00-053 because they owned and operated the facility at the time the Order was adopted in 2000.

SITE CONTAMINATION

3. Soil and groundwater at the Facility have been impacted by releases of petroleum hydrocarbons associated with petroleum product storage and dispensing. The contaminants of primary concern (COPCs) for the Facility are total petroleum hydrocarbons in the diesel (TPH-d) and gasoline (TPH-g) ranges; benzene, toluene, ethylbenzene, and xylenes (BTEX); and methyl tert butyl ether (MTBE). The primary releases that impacted the soil and groundwater beneath the Facility were from a leaking underground storage tank (UST) system that was replaced more than 30 years ago. The most recent release occurred in 1998 from a kerosene spill near the UST system. Steps taken to stop the release included using adsorbent to capture product on the asphalt, followed by investigation and subsequent excavation of the impacted area.

SITE INVESTIGATIONS AND CLEANUP ORDER

4. Numerous site investigations have been performed at the Facility since 1986. In March 1986, five borings were advanced after a petroleum sheen was observed on groundwater during the removal of two underground storage tanks on the southern end of the property. The borings were subsequently converted to monitoring wells along with two additional wells. The wells are approximately 15 feet in depth and monitor shallow groundwater for petroleum constituents.
5. In August 1989, 4 soil samples were collected beneath the loading dock of the former warehouse. The samples had elevated concentrations of hydrocarbons and the pesticide dichlorodiphenyltrichloroethane (DDT). Between September 1991 and February 1992, the warehouse was demolished. During a cleanup conducted concurrent with the demolition, soil with high concentrations of DDT was excavated and transported offsite for disposal.
6. In September 1990, 20 additional monitoring wells were constructed to depths ranging from 7 to 35 feet, and aquifer testing was conducted in 11 of the new wells. Groundwater monitoring was conducted on the 20 new wells and existing Facility wells. Groundwater was reported to be contaminated in 27 of the Facility wells and separate-phase hydrocarbons (SPH) were detected in eight wells.
7. Surface soil sampling was conducted across the Facility in 1991. Samples were analyzed for total petroleum hydrocarbons as motor oil (TPH-mo), polychlorinated biphenyls (PCBs), pesticides, and lead. Elevated concentrations of TPH-mo were present in the soil samples.
8. In May 1992, a total fluids recovery (TFR) system was installed at the Facility to remove SPH from the subsurface. Pneumatic pumps were installed in eight wells that had free-floating product greater than 3 inches in thickness. The pumps extracted SPH and groundwater at a rate of approximately 1 gallon per minute per well. A total of 121,000 gallons of SPH and groundwater were extracted. The extracted fluids were piped to the Facility oil/water separator. Separated water was treated with other wastewater from the Facility. This work was required under Site Cleanup Requirements Order (SCR) No. 92-056.
9. Groundwater monitoring of existing wells was increased from semi-annual to quarterly following installation of the TFR system. Concurrent with installation of the TFR system, a detailed soil investigation was performed by Time Oil Company to determine the vertical and horizontal extent of soil impacts. Soil samples were analyzed for TPH-d, TPH-g, total petroleum hydrocarbons as oil and grease (TPH-og), volatile organic compounds (VOCs), semi-volatile organic compounds, organochlorine pesticides, PCBs, and total metals. Petroleum hydrocarbons were detected throughout the Facility, but concentrations were below relevant soil screening levels, no remedial actions were proposed, and no additional soil sampling was performed at that time. The remaining constituents were below action levels.
10. In October 1998, an investigation was conducted to assess the extent of contamination following the release of an unknown quantity of kerosene in the northern portion of the Facility. Two additional groundwater monitoring wells were installed and were found to contain SPH. The

wells were connected to the TFR system for continued product removal. Additionally, 12 soil samples were collected from the area of the kerosene release and analyzed for TPH-g, TPH-d, TPH-kerosene, BTEX, and MTBE. To enhance the natural biodegradation of petroleum hydrocarbons in the release area, an electron acceptor compound was applied to the ground surface and watered in during two events in November 1998 and February 1999. Four thousand pounds of electron acceptor were applied to the ground surface during each event. The treatment reduced the mass and concentrations of petroleum hydrocarbons significantly.

11. On June 21, 2000, SCR Order No. 00-0053 was adopted. The purpose of that Order was to: 1) require remedial action of soil and groundwater; (2) provide a schedule for completion of remedial actions at the site; 3) rescind the previous SCR's (Order No. 92-056).
12. In January 2007, after the volume of SPH had been reduced to a sheen, the TFR system was shut off, with approval from the Water Board, for a one-year trial curtailment period. Using data from the one-year trial period, the Discharger proposed permanent curtailment of the system; however, in June 2008, the Water Board requested that the trial curtailment period be extended another two years to fully evaluate permanent shut down of the TFR system. Monitoring data from the additional two years of the extended trial curtailment period showed no rebound of SPH. Based on these results, the Water Board approved permanent curtailment and removal of the TFR system and modification of the SMP in October 2013. The TFR system has not been operated since January 2007.
13. In September 2010, the oil/water separator system servicing the Facility was replaced. During replacement of the submersible pump, four soil samples were taken from the excavation sidewalls at approximately 10 feet bgs. The samples were analyzed for TPH-d, TPH-g, TPH-mo, VOCs, and metals. The results from this investigation indicated low levels of TPH-mo.

RECENT INVESTIGATIONS AND REMEDIAL ACTIONS

14. In November 2013, monitoring well CS-11 was abandoned due because SPH had smeared inside the well casing, likely causing the higher concentrations of TPH-d in groundwater in this well as compared to the rest of the Facility. Monitoring well CS-11R was installed to replace CS-11, and levels of TPH-d in the replacement well were significantly lower than in Well CS-11.
15. In March 2016, a push-probe investigation was performed to delineate the extent of residual SPH in the vicinity of well CS-11R. Residual SPH was observed to extend approximately 80 feet south of CS-11R. Residual SPH was also observed to the north and west of CS-11R, consistent with previous investigations. A new well (CS-21) was installed downgradient, just outside the identified area of the residual SPH to monitor for evidence of hydrocarbon migration, and well CS-11R was abandoned. Well CS-21 has shown no evidence of significant plume migration into the downgradient area.
16. In December 2018 the Discharger submitted a closure request in accordance with the Water Board's Low Threat Closure Policy (Policy). This request evaluated Facility conditions against each of the General and Media-Specific Criteria outlined in the Policy. The Conceptual Site

Model and associated monitoring data presented in the request demonstrated that the residual dissolved and separate-phase petroleum constituents in the subsurface beneath the Facility do not present unacceptable risks to human or ecological receptors because groundwater isn't a considered a drinking water source (because of naturally high TDS) and because there are no vapor intrusion (VI) concerns.

17. In December 2019, a Contaminated Media Management Plan (CMMP) was submitted to summarize procedures for appropriate management of soil at the Facility that is found to contain petroleum hydrocarbons at concentrations above applicable screening levels. The CMMP describes how petroleum-impacted soil will be managed during future Facility activities and provides instructions regarding certain activity restrictions and/or handling requirements at the Facility. The CMMP was filed with the Facility Terminal Manager and will be followed prior to and during any intrusive work.
18. On April 6, 2020, a Deed restriction was recorded with the Contra Costa County Recorder's Office to prohibit residential development at the site.
19. Water Board staff conclude that there is a minimal risk to human health or the environment from residual contamination at the Facility. The Facility meets all eight Policy General criteria for closure. All soil and groundwater sources have been removed to the extent practicable, and the remaining contaminant concentrations in soil pose no threat to groundwater quality. The Dischargers have therefore successfully met the cleanup objectives of Order No. 00-053 and the Water Board considers Facility remediation complete and the site suitable for restricted use as detailed in the deed restriction for the Facility. Thus, Order No. 00-053 is no longer necessary and should be rescinded.

CEQA, NOTIFICATION, AND PUBLIC HEARING

20. The rescission of the Site Cleanup Requirements will have no potential for causing a significant effect to the environment and is therefore not subject to the California Environmental Quality Act (Public Resources Code § 21000 et seq.) pursuant to Title 14, Cal. Code Regs., § 15061(b)(3).
21. The Water Board has notified the Dischargers and interested agencies and persons of its intent to rescind site cleanup requirements contained in Order No. 00-053 and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.

IT IS HEREBY ORDERED that Site Cleanup Requirements Order No. 00-053 is rescinded.

I, Michael Montgomery do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Region on XX, 2020.

Order No. R2-2020-XXXX
Rescission of Cleanup and Abatement Order No. 00-053
Shore Terminals, LLC Richmond Terminal, Richmond, CA

Michael Montgomery
Executive Officer

Attachments:

Figure 1, Site Location Map

