Final
October 6, 2011

Review of
Leaking Underground Storage Tank Cases
Not in Cleanup Fund and Open Over 15 Years

Sacramento County
Local Oversight Program

Prepared as in-kind task as part of Cooperative Agreement
LS-97952501-3 between USEPA Region 9 and the California State Water Resources Control Board
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</tbody>
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2. T0606700055 (KRAFT/KNUDSEN DISTRIBUTING DEPOT)
3. T0606700266 (1000 DEL PASO BOULEVARD)
4. T0606745099 (CALTRANS EQUIPMENT SHOP)
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8. T0606700205 (CREST DISTRIBUTORS)
9. T0606700580 (BEE KEEPER SUPPLY)
Executive Summary

The Draft version of this report was submitted on August 31, 2010 and U.S. EPA Region 9 (USEPA) and Sullivan International Group, Inc. (Sullivan) scheduled a meeting to be held on August 30, 2011 to discuss the draft report and the agency’s next steps for each case. During the August 2011 meeting barriers to moving cases to closure were discussed. Primary barriers discussed by the agency were recalcitrant RPs and lack of funding because of economical hardships.

One of the sites, LUM BUNN SONS (T0606700855), has been closed since the last review and another site is on track to be closed within one-year or less (Beacon #3603—T0606700329). Two cases have been identified by the agency as potential candidates for the Emergency, Abandoned, & Recalcitrant (EAR) account: Abandoned Gas Station (T0606700087) and Crest Distributors (T0606700205). The remaining cases have the same status as they did during the 2010 Draft Report.
Sacramento County LOP

Apparent Case Status – Initial and After

TOTAL NUMBER OF CASES REVIEWED = 9
NUMBER OF ACTIVE LUST CASES ON NOVEMBER 1, 2010 = 309 CASES
DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON AUGUST 31, 2010
RESPONSE/MEETING WITH AGENCY ON August 30, 2011

APPARENT STATUS OF CASES REVIEWED – INITIAL REVIEW AND AFTER MEETING TO DISCUSS CASES

<table>
<thead>
<tr>
<th>Apparent Case Status</th>
<th>Initial Assessment Number of Cases (08-31-2010)</th>
<th>Post Meeting Assessment Number of Cases (08-30-2011)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CASE CLOSED</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Appears close to completion</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Appears near completion within 1-year</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Appears to be on track</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>Appears NOT to be on track</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Unable to determine (Insufficient information in GeoTracker)</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>NOT FEDERAL UST CASE</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>OTHERS – Considered a Duplicate Case</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Initial Assessment Percentage of Cases (08-31-2010)

- Appears near completion within 1-year: 11%
- Appears to be on track: 33%
- Appears NOT to be on track: 11%
- Appears to be stuck: 45%

Post Meeting Assessment Percentage of Cases (08-30-2011)

- CASE CLOSED: 11%
- Appears close to completion: 33%
- Appears near completion within 1-year: 11%
- Appears to be on track: 34%
- Appears NOT to be on track: 11%
- Appears to be stuck: 11%
<table>
<thead>
<tr>
<th>SITE NAME</th>
<th>CASLLEAD AGENCY</th>
<th>PRIMARY OCC (GEO/2010)</th>
<th>PRIMARY TYPE OF RP</th>
<th>DD: OTHER (Individual, Homes etc)</th>
<th>GLOBAL ID</th>
<th>SITE ID</th>
<th>CHANGE IN STATUS IN THE CLEANUP PIPELINE (BASED ON MEETING/CALL WITH AGENCY ON 08/30/11)</th>
<th>DISCUSSION/NOTES FROM MEETING/CALL (08-30-2011)</th>
<th>NEXT STEPS FOR AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>BEACON #9003 (FORMER) T0606700329 SJE</td>
<td>G - Government Entity (include School, Hospital, Utility)</td>
<td>SJE</td>
<td>Gasoline</td>
<td>5/20/1989</td>
<td>The caseworker said that the consultant is preparing NFAR and that the agency will review once it is submitted. If the data looks good then the case could be closeable within one year.</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CALTRANS EQUIPMENT SHOP T0606745099 SJE</td>
<td>G - Government Entity (include School, Hospital, Utility)</td>
<td>SJE</td>
<td>Gasoline</td>
<td>2/7/1989</td>
<td>The caseworker said the consultant is currently pulsing the SVE system, which is reaching the end of its useful life. This case appears to be ON TRACK for closure and is potentially closeable within one year.</td>
<td>Continue current remediation until low-risk criteria is met</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1000 DEL PASO BOULEVARD T0606700266 SIE</td>
<td>D - Other (Individual, Homes etc)</td>
<td>SIE</td>
<td>Gasoline</td>
<td>1/18/1989</td>
<td>The caseworker said that the consultant is preparing NFAR and that the agency will review once it is submitted. If the data looks good then the case could be closeable within one year.</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>KRAFT/KNUDSEN DISTRIBUTING DEPOT T0606700055 CLA</td>
<td>I - Industry (Railroad, Steel etc)</td>
<td>CLA</td>
<td>Gasoline</td>
<td>5/6/1987</td>
<td>The caseworker said that a lot of remediation work has been conducted on this site such as In Situ Chemical Oxidation. On-going monitoring occurs at the site. This case is ON TRACK.</td>
<td>Continue current remediation until low-risk criteria is met</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SJE Gasoline</td>
<td>O - Other (Individual, Homes etc)</td>
<td>SJE</td>
<td>Gasoline</td>
<td>5/1/1995</td>
<td>The case was closed on 04/25/2011.</td>
<td>Case Closed</td>
<td></td>
<td></td>
<td></td>
</tr>
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<td>Case Closed</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### CASE REVIEW SUMMARY TABLE

**SACRAMENTO COUNTY LOCAL OVERSIGHT PROGRAM**

<table>
<thead>
<tr>
<th>NOx</th>
<th>INCIDENT SUMMARY</th>
<th>RESPONSE</th>
<th>LOCAL COUNTY PROGRAM</th>
<th>LOCAL ENTITY</th>
<th>RESPONSE DATE</th>
<th>NEXT DPT FOR AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>NORTHERN RECEPTION CENTER</td>
<td>Appear</td>
<td>Gasoline</td>
<td>Government</td>
<td>11/7/1986</td>
<td>Push for new/additional remedial investigation (RI)/risk assessment</td>
</tr>
<tr>
<td>2</td>
<td>ABANDONED GAS STATION</td>
<td>Appears to be stuck</td>
<td>Gasoline</td>
<td>D - Other (Individual, Homes etc)</td>
<td>10/7/1986</td>
<td>Ensure RP compliance (includes siteRP, enforcement, EAR account etc)</td>
</tr>
<tr>
<td>3</td>
<td>CREST DISTRIBUTORS</td>
<td>Appears to be stuck</td>
<td>Gasoline</td>
<td>S - Small Private Businesses</td>
<td>10/7/1987</td>
<td>Ensure RP compliance (includes siteRP, enforcement, EAR account etc)</td>
</tr>
<tr>
<td>4</td>
<td>REE KEEPER SUPPLY</td>
<td>Appears to be stuck</td>
<td>Gasoline</td>
<td>D - Other (Individual, Homes etc)</td>
<td>12/3/1992</td>
<td>Ensure RP compliance (includes siteRP, enforcement, EAR account etc)</td>
</tr>
</tbody>
</table>

The caseworker noted that this site is owned by Sacramento State University and that the University was planning to put student housing there. There was contamination found in a sidewalk of a pit right next to a building and the university asked the agency to wait to finish delineation until they are ready to know what is going on with the building because that building is in the way of the assessment work. The caseworker said that when the economy declined then the development project was put on hold and thus far there is only one wall that has been installed at the site and monitoring has historically been done. The caseworker said that there is not a history of clean groundwater samples. No indoor air samples have been collected and agency says it is not necessary. The caseworker said that this could be considered for closure but assessment is not complete but maybe fate and transport modeling could be conducted to suffice for closure. The caseworker said that the RP is Not recalcitrant and this site is on the agency radar but just haven't made progress on it in a while. This case remains Not on Track until figure out next steps.

This case was considered for closure but assessment is not complete but maybe fate and transport modeling could be conducted to suffice for closure. The caseworker said that the RP is Not recalcitrant and this site is on the agency radar but just haven't made progress on it in a while. This case remains Not on Track until figure out next steps.

This case remains Stuck because of a Recalcitrant RP.

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*Final Review of LUST Cases, Not in the CLF and Over 15 Years, Sacramento County LOP*
Attachment 1:

Case Review Power Point Slides from Draft Report

The contents of this attachment are provided in electronic format only.
LUM BUNN SONS (T0606700855)
14395 RACE TRACK RD, WALNUT GROVE, CA 95690

Case Age: 15 years
RP Identified by Regulator: FONG PROPERTY
Not claimed in GeoTracker
Primary COC: GASOLINE
Current Land Use: Not verified

Possible Reasons Why This Case Is So Old
• Appears limited regulatory enforcement and deadlines not aggressively enforced; 14 years before an enforcement action was issued.
• No documents, limited site history.
• Waiting for closure documentation since 2004.

Activities Conducted to Date Based on GeoTracker Info
T0606700855

Assessment last 5 years
• None documented
• 1/2010 well installation WP

Remediation last 5 years
• None documented

Assessment older than 5 years
• None documented

Remediation older than 5 years
• None documented
**IMPEDEMENTS TO CLOSURE**

**PROCEDURAL IMPEDEMENTS**

Non-Responsive and/or Recalcitrant Responsible Party - A notice to comply was necessary to get the RP to submit information required for closure.

Monitoring Wells Not Yet Abandoned - *Groundwater meets WQOs. However, potential conduit remains until monitoring wells destroyed.*

**BENEFITS OF ADDITIONAL WORK**

Protect Designated Beneficial Uses - *Groundwater meets WQOs. However, potential conduit remains until monitoring wells destroyed.*

**SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**

<table>
<thead>
<tr>
<th>SENSITIVE RECEPTOR</th>
<th>TIME FRAME FOR IMPACT</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Undetermined</td>
<td>Groundwater meets WQOs. However, potential conduit remains until monitoring wells destroyed.</td>
</tr>
</tbody>
</table>

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**Review Conclusions**

- No ESI submittals, recalcitrant RP. Limited regulatory enforcement and historically, deadlines were not aggressively enforced.

- From activities report, in 2005, consensus for closure was based on Groundwater Monitoring, Well Sampling, and Intrinsic Biodegradation report dated 2/2004. Regulator followed-up four years later in 2008 and when the consultant was contacted, they indicated that the RP would not authorize consultant to compile closure documentation. Regulator made efforts to enforce the

- 2nd notice to comply sent 3/2009 (only document uploaded to GeoTracker): regulator requested report of the additional GW sampling (and estimate of remaining contaminant mass) event to be submitted by 12/2008 required for closure.

- Closure review dated 8/2009 indicates that GW meets WQOs, “however, potential conduit remains until monitoring wells destroyed.”

- **Discussion:** Next step – how to move this case toward closure? Well destruction no longer required to issue NFA, case appears ready for closure. Aggressively enforce MW destruction?
**Possible Reasons Why This Case Is So Old**

- Appears to have limited regulatory guidance and sporadic actions: assessment/remediation carried out and consultant requested closure in 1996. Appears regulators did not consider case for closure until three years later in 9/1999 and requested a supplemental GWM event, which was conducted in 12/1999 and free product was discovered.
- Many monitoring events since 1999 and additional remediation was not considered until 2009, aside from manual removal of the free product that was frequently measured.
- Off-site source of PCE, TCE, and cis-1,2-DCA contamination presumed from 2004 groundwater data and now they are continuing to determine its location.
- Free product frequently present.

---

**Activities Conducted to Date Based on GeoTracker Info T0606700055**

**Assessment last 5 years**
- Ongoing quarterly GWM since 2000

**Assessment older than 5 years**
- Subsurface investigation in 1987 and 1988; 10 MWs installed
- Quarterly GWM from 2/1991 to 1995
- MWs abandoned due to lowering of the water table and damage; six MWs replacements installed 6/1993
- Quarterly GWM from 7/2000, additional six MWs installed and three MWs installed 1/2004

**Remediation last 5 years**
- WP submitted 1/2010 for subsurface investigation, treatability study, and additional well installation

**Remediation older than 5 years**
- 10,000 ga UST removed 1987, which stored gasoline until 1985 and diesel from 1985-10/1986
- Low permeability composite concrete/synthetic liner cover installed 2-4/1991
IMPEDEMENTS TO CLOSURE  T0606700055
as reported by regulatory agency

BENEFITS OF ADDITIONAL WORK
Fill-in RI Data Gaps - Additional investigation needed - workplan submitted
Other - Monitoring wells not destroyed

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

<table>
<thead>
<tr>
<th>SENSITIVE RECEPTOR</th>
<th>TIME FRAME FOR IMPACT</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipal Well</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Domestic Wells</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Groundwater</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Surface Water (Bay, Estuary, Stream, Lake)</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Storm drain (Runoff of contaminated soil)</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Indoor Air (Residential or Commercial)</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Irrigation / Industrial Well</td>
<td>Undetermined</td>
<td>None</td>
</tr>
<tr>
<td>Other</td>
<td>Undetermined</td>
<td>None</td>
</tr>
</tbody>
</table>

Review Conclusions  T0606700055

• Limited regulatory oversight and guidance: Assessment conducted, remedial action taken, and consultant requested closure in 1996. Regulators did not consider closure until 1999 and site was recommended for closure in 12/1999 pending a supplemental GWM event, which was conducted and free product was discovered in a source area well and detections of 1,2-DCA.

• Most recent GWMR indicates no detections of TPHg and COC in GeoTracker should be corrected. TPHd detected in one well and unknown petroleum hydrocarbons atypical of petroleum hydrocarbons in the gas range (TPHg-UH) and unknown petroleum hydrocarbons in the diesel range (TPHd-UH) are detected in most wells. 1,2-DCA still detected above MCLs.

• Closure review dated 2/2010 indicates that an additional investigation is needed and a work plan has been submitted for subsurface investigation, treatability study, and additional well installation (approved 3/15/2010).

• Discussion: Next step – how to move this case toward closure? Enforce deadlines and continue to provide timely oversight. Appears case is on track. Request a conceptual site model to assist in identifying off-site source and sensitive receptors?
1000 DEL PASO BOULEVARD (T0606700266)
1000 DEL PASO BLVD, SACRAMENTO, CA 95815

Case Age: 21 years
RP Identified by Regulator: STEVE & ERICA RODRIGUEZ
Primary COC: GASOLINE
Current Land Use: Vacant lot, former service station

Possible Reasons Why This Case Is So Old
• Regulatory action in 10/1989 indicated that the original RP filed for bankruptcy after her bank went under as a result of the savings and load debacle. Another action 12 years later dated 12/2001 indicates that the new owner bought the site for $5,000 (taxes owed) and regulator was in communication with them regarding their responsibilities to cleanup up the site.

NOTE: Data queried from GeoTracker and reviewed in August 2010

Activities Conducted to Date Based on GeoTracker Info
T0606700266

Assessment last 5 years
• Ongoing monitoring. MWs sampled semi-annually and 1 MW sampled quarterly to assess remedial progress
• Preliminary investigation in 9/2006
• HHRA in 4/2010

Remediation last 5 years
• WO UST removed 10/2007
• Over-excavation in 2007
• SVE system began 4Q09

Assessment older than 5 years
• Soil samples after removal in 1989

Remediation older than 5 years
• Three USTs removed 1/1989
**IMPEDEMENTS TO CLOSURE T0606700266**

**IMPEDEMENTS TO CLOSURE**

**SITE ASSESSMENT INCOMPLETE**
Sensitive Receptor Survey Has Not Been Completed - *Not done yet*

**PLUME INSTABILITY**
Groundwater Contamination Plume Not Stable or Decreasing - *Remediation system will be operating*

**GROUNDWATER IMPACTS**
Groundwater Impacted Above Other Cleanup Goal - *Remediation system will be operating*

**BENEFITS OF ADDITIONAL WORK**
Verify Remedial Action Effectiveness - *Remediation system will be operating*
Protect Human Health - *VI and HHRA need to be done*

**SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**

<table>
<thead>
<tr>
<th>SENSITIVE RECEPTOR</th>
<th>TIME FRAME FOR IMPACT</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>Remediation system being installed mainly to remove remaining soil contamination Indoor</td>
</tr>
<tr>
<td>Air (Residential or Commercial)</td>
<td>Undetermined</td>
<td>needs to be assessed</td>
</tr>
</tbody>
</table>

**NOTES / COMMENTS**
OSCA site

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**Review Conclusions T0606700266**

- Initial soil samples in 1989 detected elevated concentrations of BTEX and up to 2,100 mg/kg TPHg. RP filed for bankruptcy and her bank, then went under in the savings and loan crisis.

- No activity until 2001 when the regulator corresponded with the new RP. The new owner claimed they bought the site for $5,000 (taxes owed on property) and the regulator notified the owner of their responsibilities. Site assessment began and it was subsequently entered into the Orphan fund in 2006.

- Closure review dated 10/22/2009 indicated that the remediation system will be operating to remove remaining soil contamination and a VI and HHRA need to be completed. HHRA completed 4/2010 and SVE in continued operation.

- *Discussion: Site is in the Orphan fund and appears to be on track.*
CALTRANS EQUIPMENT SHOP (T0606745099)
34TH & STOCKTON BL, SACRAMENTO, CA

Case Age: 21 years
RP Identified by Regulator: CALTRANS
Primary COC: GASOLINE
Current Land Use: Not changed

Possible Reasons Why This Case Is So Old

• Assessment ongoing since inception of case.
• Groundwater remediation since 2005 and recently shutdown to assess rebound.
• Elevated concentrations of petroleum and chlorinated compounds still detected.
• TCE plume not completely defined and in the process of determining source.

Activities Conducted to Date Based on GeoTracker Info T0606745099

Assessment last 5 years
• Ongoing GW monitoring

Remediation last 5 years
• Ongoing treatment system, SVE/AS since 2005; shutdown on 8/3/2010 to assess rebound

Assessment older than 5 years
• Soil sampling after removal and subsequent investigations included installation of 18 MWs and seven vapor wells.

Remediation older than 5 years
• USTs removed 2/1989
• Remediation pilot test 1999
• Soil/GW treatment system installed and started 2/2005 and currently operating

NOTE: Data queried from GeoTracker and reviewed in August 2010
IMPEDEMENTS TO CLOSURE  T0606745099
as reported by regulatory agency

IMPEDEMENTS TO CLOSURE
SITE ASSESSMENT INCOMPLETE
Other - Remediation underway - high concentrations of petroleum and chlorinated compounds

GROUNDWATER IMPACTS
Groundwater Will Not Meet Relevant WQOs Before the Beneficial Use of the Groundwater is Needed
- Remediation of groundwater underway

UNACCEPTABLE RISK
Other - HHRA not yet performed - VI not yet done

BENEFITS OF ADDITIONAL WORK
Verify Remedial Action Effectiveness - Remediation underway
Remove / Reduce Source Mass - Remediation underway
Protect Human Health - VI not yet done

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>concentrations - remediation underway</td>
</tr>
<tr>
<td>Indoor Air (Residential or Commercial)</td>
<td>Undetermined</td>
<td>VI not yet done</td>
</tr>
</tbody>
</table>

Review Conclusions  T0606745099

• Closure review dated 10/2/2010 indicated that high concentrations of petroleum and chlorinated compounds are still detected and off-site source has yet to be located.

• TCE plume not completely defined and the consultant is working in conjunction with the adjacent site owners to determine if their property is the source.

• They are assessing best move forward, including ways to improve onsite groundwater remediation and quickest way to move toward site closure.

• Discussion: Next step – how to move this case toward closure? Request site risk assessment and site conceptual model? Site appears to be on track.
BEACON #3603 (FORMER) (T0606700329)
10299 FOLSOM BLVD, RANCHO CORDOVA, CA 95670

Case Age: 21 years
RP Identified by Regulator: TESORO PETROLEUM COMPANIES, INC
Primary COC: GASOLINE
Current Land Use: Not changed, service station

Possible Reasons Why This Case Is So Old
• A 350 gal waste oil UST removed in 1987 and no soil samples were collected, assume because it was stated that there was no evidence of impact observed.
• Leak detected and USTs removed ten years later in 1997.

Activities Conducted to Date Based on GeoTracker Info
T0606700329

Assessment last 5 years
• Ongoing monitoring: 8 MWS semi-annually and 2 MWs annually
• FS conducted 10/2007

Remediation last 5 years
• SVE pilot test in 3/2006
• Oxygen injection operated since 9/2008, recently shutdown to assess rebound

Assessment older than 5 years
• Leak detected in product lines in 4/1996 and soil samples collected
• Soil samples collected after UST removal in 1997
• Soil sampling in 9/1997, wells installed 1998, and ongoing monitoring since then

Remediation older than 5 years
• WO UST removed 2/1987
• Three USTs removed 9/1997 and soil over-excavated

NOTE: Data queried from GeoTracker and reviewed in August 2010
IMPEDEMENTS TO CLOSURE  T0606700329
as reported by regulatory agency

IMPEDEMENTS TO CLOSURE
SITE ASSESSMENT INCOMPLETE
Sensitive Receptor Survey Has Not Been Completed - Not done yet

UNACCEPTABLE RISK
Other - HHRA and VI evaluation not yet done

BENEFITS OF ADDITIONAL WORK
Other - Remediation of the site occurring

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

<table>
<thead>
<tr>
<th>SENSITIVE RECEPTOR</th>
<th>TIME FRAME FOR IMPACT</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>Remediation system operating</td>
</tr>
</tbody>
</table>

Review Conclusions  T0606700329

• A 350 ga waste oil UST removed in 1987 and no soil samples were collected, assume because it was stated that there was no evidence of impact observed.

• Monitoring groundwater to evaluate if rebound in concentrations is occurring with the shutdown of the oxygen injection system. Status should be verification monitoring instead of site assessment.

• Closure review dated 10/2009 indicates sensitive receptor survey, HHRA, and VI evaluation has not been done yet.

• Discussion: Next step – Request risk assessment and enforce deadlines? Appears to be on track.
NORTHERN RECEPTION CENTER (T0606700029)
3001 RAMONA AVE, SACRAMENTO, CA 95826

Case Age: 24 years
RP Identified by Regulator: CA YOUTH AUTHORITY
Primary COC: GASOLINE
Current Land Use: Not changed, now called Department of Juvenile Justice

Possible Reasons Why This Case Is So Old
• Appears to have limited enforcement and oversight.
• State School site, funding issues?
• No activities for 15 years, after 1990 to 2005.
• Soil contamination extends below adjacent building and agency agreed to postpone assessment until redevelopment construction began.
• RP is CA State University, Sacramento.

NOTE: Data queried from GeoTracker and reviewed in August 2010

Activities Conducted to Date Based on GeoTracker Info
T0606700029

Assessment last 5 years
• Soil and grab GW sampling 12/2005
• MW-1 installed and sampled 12/2006-1/2007
• MW-1 now sampled annually

Remediation last 5 years
• None documented

Assessment older than 5 years
• Six soil borings advanced 4/1989

Remediation older than 5 years
• 550 ga UST removed 6/1988
• 1,700 cubic yds soil excavated to 36 fbg in 4/1990
**IMPEDEMENTS TO CLOSURE**  
**TO6067000029**  
as reported by regulatory agency

**IMPEDEMENTS TO CLOSURE**  
**INADEQUATE SOURCE CONTROL**
Remaining Source Poses Threat to Groundwater - *Contaminated soil to be excavated following demolition of adjacent building.*

**BENEFITS OF ADDITIONAL WORK**
Remove / Reduce Source Mass - *Get rid of contaminated soil posing GW threat*
Protect Designated Beneficial Uses - *GW*

**SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**

<table>
<thead>
<tr>
<th>SENSITIVE RECEPTOR</th>
<th>TIME FRAME FOR IMPACT</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Municipal Well</td>
<td>&gt; 10 Years</td>
<td>not likely</td>
</tr>
<tr>
<td>Domestic Wells</td>
<td>&gt; 10 Years</td>
<td>not likely</td>
</tr>
<tr>
<td>Groundwater</td>
<td>&gt; 10 Years</td>
<td>not likely</td>
</tr>
</tbody>
</table>

**Review Conclusions**  
**TO6067000029**

- Soil excavated in 1990 and further excavation stopped 5-ft from maintenance building. In 11/1996 letter, regulator denied NFA status “due to the need for an evaluation of potential impact to GW and the need for a timeline for reaching cleanup goals by natural attenuation.” No activities until 2005 request for a scope of work for additional assessment.

- MW-1 was installed 12/2006 30-ft down-gradient of former UST, which is sampled annually. Petroleum hydrocarbons not detected above reporting limits except the fuel additive 1,2-DCA below 4 µg/L since initial sampling. Location data of MW not entered in GT.

- Closure review dated 3/5/2010 indicates contaminated soil is scheduled to be excavated following demolition of adjacent building. From GWMRs, appears they are waiting to conduct risk assessment and potential soil contamination once the building is removed, but it appears the buildings have been removed based on aerial photographs and 8/19/2010 note in activities page indicated that the building may have recently burned down. Regulator is awaiting response from RP regarding their plans and cannot consider closure until the site until the site is assessed.

- **Discussion:** Next step – how to move this case toward closure? Has the maintenance building been demolished; if not, is it necessary to wait to assess risk? Sample soil adjacent to the building? Assess risk, sensitive receptors, and determine if the case is ready for closure?
ABANDONED GAS STATION (T0606700087)
3 MAIN ST, ISLETON, CA 95641

Case Age: 24 years
RP Identified by Regulator: PRIVATE CITIZEN
(KATHRYN M. DORSEY REVOCABLE TRUST)
Primary COC: GASOLINE
Current Land Use: Yes, commercial/retail building

Possible Reasons Why This Case Is So Old

• USTs discovered during construction effort and removed in 1986.
• Appears no site activities for 19 years, after 1986 to 2005. Limited regulatory oversight and enforcement.
• Shell disputed ownership of the site or station in 2005. No activities since due to RP financial hardship.

Activities Conducted to Date Based on GeoTracker Info
T0606700087

Assessment last 5 years
• None documented

Remediation last 5 years
• None documented

Assessment older than 5 years
• Construction on 9/1986 uncovered soil and GW containing gasoline odors at 7 fbg.
• Soil and grab GW sampling in 10/1986

Remediation older than 5 years
• Two 550 ga USTs removed 11/1986
**IMPEDEMENTS TO CLOSURE**

**TO606700087**

as reported by regulatory agency

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**IMPEDEMENTS TO CLOSURE**
**SITE ASSESSMENT INCOMPLETE**

Extent of Contamination Has Not Been Determined - *i. Extent of groundwater contamination has not been determined.*

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *i. Risk assessment not completed*

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**BENEFITS OF ADDITIONAL WORK**

Protect Human Health - *i. Risk assessment not completed.*

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**SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**

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</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Undetermined</td>
<td>not yet assessed</td>
</tr>
</tbody>
</table>

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**Review Conclusions**

- Documents from file uploaded by regulator. Case is claimed, but no ESI submittals. 2005 soil/GW work plan includes site history, which indicated construction on 9/1986 uncovered soil and GW containing gasoline odors at 7 fbg and two 550 ga USTs removed 10/1986.
- 2005 WP was approved in letter dated 2/2005, but appears no work was conducted. Shell responded and claimed they never owned the site or the station.
- 12/2008 action indicates RP claims to have no money and regulator “needs potent enforcement tool.”
- Commercial/retail zone and Sacramento River is adjacent to the site.
- *Discussion: Next step – how to move this case toward closure? Aggressively enforce ESI compliance? Refer to the DA, EAR, or Regional Board? Identify sensitive receptors and evaluate risk?*
CREST DISTRIBUTORS (T0606700205)
470 16TH ST N (AKA: 1506 SPROULE), SACRAMENTO, CA 95814

Case Age: 23 years
RP Identified by Regulator: E.D. PROPERTIES
Not Claimed in GeoTracker
Primary COC: GASOLINE
Current Land Use: Not changed

Possible Reasons Why This Case Is So Old
• Limited regulatory oversight and enforcement.
• No activities conducted for 8 years from 1989 until 1997, for 3 years from 1997 to 2000, and for another 5 years from 2000 to 2005.

NOTE: Data queried from GeoTracker and reviewed in August 2010

Activities Conducted to Date Based on GeoTracker Info T0606700205

<table>
<thead>
<tr>
<th>Assessment last 5 years</th>
<th>Remediation last 5 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>MWs sampled 8/2005</td>
<td>None documented</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assessment older than 5 years</th>
<th>Remediation older than 5 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil after UST removals in 1987</td>
<td>Two USTs removed 10/1987</td>
</tr>
<tr>
<td>Soil borings and 3 MWs installed 1988</td>
<td>Third UST removed 11/1989</td>
</tr>
<tr>
<td>MWs not sampled until 8/1997</td>
<td>Forth UST removed 10/1997</td>
</tr>
<tr>
<td>MWs redeveloped and sampled 12/1999, 4/2000</td>
<td></td>
</tr>
</tbody>
</table>
IMPEDIMENTS TO CLOSURE T0606700205
as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE
Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - i. Risk assessment not completed

GROUNDWATER IMPACTS
Groundwater Impacted Above Other Cleanup Goal - above WQO

BENEFITS OF ADDITIONAL WORK
Protect Human Health - i. Risk assessment not completed

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>above WQO</td>
</tr>
</tbody>
</table>

Review Conclusions T0606700205

- Documents uploaded by regulator and no submittals by RP.
- Recalcitrant RP and limited enforcement. Not claimed in GeoTracker and site investigation not completed. Very sporadic groundwater sampling events.
- Consultant requested closure after 4/2000 sampling, GW concentrations were below reporting limits. In 10/2001, regulator said they can “consider” closure once they received a letter certifying that all owners of the title have been notified of the request for closure AND required one final round of sampling because “both state statute and county ordinance require that wells be used at least once per year.” No follow-up in GeoTracker.
- Last action by consultant, who provided the requested GWMR dated 8/2005 and closure requested. Appears there was no response from the regulator.
- Discussion: Next step – how to move this case toward closure? Provide oversight? Close case? Aggressively enforce ESI compliance and set deadlines? Recommend to the DA, EAR, Regional Board?
**BEE KEEPER SUPPLY (T0606700580)**
2417 21ST ST, SACRAMENTO, CA 95818

**Case Age:** 18 years  
**RP Identified by Regulator:** GHIDINELLI, GIOVITO  
**Not Claimed in GeoTracker**  
**Primary COC:** GASOLINE  
**Current Land Use:** Address is for Aikido Center

**Possible Reasons Why This Case Is So Old**
- No regulatory enforcement.  
- Site history is unknown, there are no documents uploaded.

**Activities Conducted to Date Based on GeoTracker Info**
**T0606700580**

**Assessment last 5 years**
- None documented

**Remediation last 5 years**
- None documented

**Assessment older than 5 years**
- None documented

**Remediation older than 5 years**
- None documented

*NOTE: Data queried from GeoTracker and reviewed in August 2010*
IMPEDEMENTS TO CLOSURE  T0606700580

as reported by regulatory agency

IMPEDEMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE
Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified
And Assessed - i. Risk assessment not completed

PLUME INSTABILITY
Groundwater Contamination Plume Not Stable or Decreasing - no declining trend

BENEFITS OF ADDITIONAL WORK
Protect Human Health - i. Risk assessment not completed

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<td>Already Impacted</td>
<td>above WQO</td>
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</table>

Review Conclusions  T0606700580

• Closure review dated 6/23/2010 indicates groundwater is impacted, there is no declining trend, and a risk assessment has not been completed. No documents in GeoTracker and a determination about the site could not be made.

• Activities report indicate that in 9/2009 the case was “transferred from CWI to CLA, nothing in GeoTracker, need to review file.”

• Staff notes indicate that the site was a historical LUSTIS cleanup action.

• Discussion: Next step – how to move this case toward closure? Aggressively enforce ESI compliance? Recommend to the DA or EAR? Review file?