

# **Final**

**November 23, 2011**

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

### **Merced County Local Oversight Program (LOP) Cases**

**Prepared as in-kind task as part of Cooperative Agreement LS-96934701-1 between  
USEPA Region 9 and the California State Water Resources Control Board**

# Table of Contents

<b>Section</b>	<b>Page</b>
Executive Summary .....	1
Apparent Case Status – Initial Review and After Discussion with Lead Agency.....	2
Updated Aging Non-CUF Case Review Summary Table .....	3
Attachment 1: Draft Report – Including Case Review PowerPoint Slides	
1. T0604700021 (Mid-Franklin Yard)	
2. T0604700045 (Larry’s Shell Service)	
3. T0604700123 (Vic Figueroa Motors)	

## **Executive Summary**

The Draft version of this report was submitted on June 10, 2010, with a request for a follow-up meeting and input from Merced County Local Oversight Program (LOP) into the “Next Steps for Agency” column of the case cleanup status spreadsheet.

Merced County Local Oversight Program (LOP) had a conference call with USEPA Region 9’s contractor, Tetra Tech, Inc., on October 25, 2011 to discuss the draft report and the lead agency’s next steps for each of the 3 cases reviewed. Conclusions from the conference call are:

- One case (Larry’s Shell Service – T0604700045) was closed.
- One case (Mid-Franklin Yard – T0604700021) is near closure; case in 30-days closure process.
- One case that originally appears to be stuck (Vic Figueroa Motors – T0604700123) is now on track.

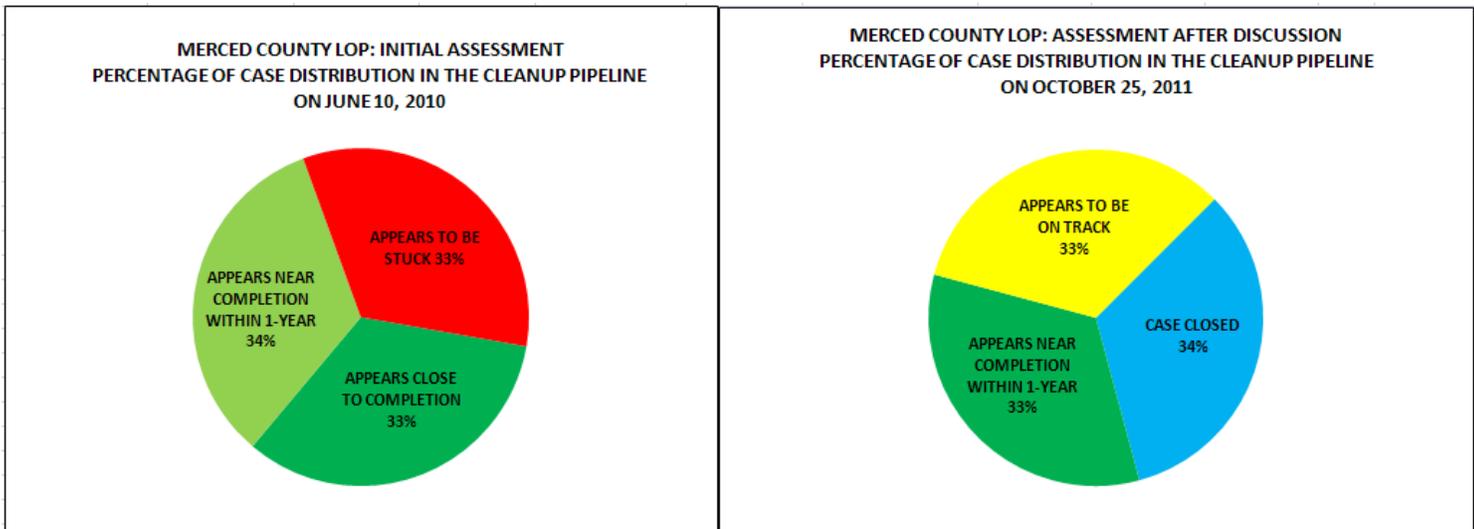
## Merced County Local Oversight Program (LOP)

### Apparent Case Status – Initial Review and After Discussion with Agency

TOTAL NUMBER OF CASES REVIEWED = 3 CASES  
 NUMBER OF ACTIVE LUST CASE ON JUNE 1, 2010 = 63 CASES  
 DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON JUNE 10, 2010  
 CONFERENCE CALL WITH THE AGENCY TO DISCUSS CASES REVIEWED ON OCTOBER 25, 2011

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

Apparent Case Status	Initial Assessment Number of Cases (06-10-2010)	Post Conference Call Assessment Number of Cases (10-25-2011)
CASE CLOSED	0	1
Appears close to completion	1	1
Appears near completion within 1-year	1	0
Appears to be on track	0	1
Appears NOT to be on track	0	0
Appears to be stuck	1	0
Unable to determine (Insufficient information in GeoTracker)	0	0



**CASE REVIEW SUMMARY TABLE  
(MERCED COUNTY LOCAL OVERSIGHT PROGRAM)**

ESTIMATED STATUS IN THE CLEANUP PIPELINE? (June 10, 2010)	ESTIMATED STATUS IN THE CLEANUP PIPELINE? (October 25, 2011)	SITE NAME (CASE LEAD AGENCY: MERCED COUNTY LOP)	GLOBAL ID	CASEWORKER	PRIMARY COC (In GeoTracker)	APPARENT TYPE OF RP	RELEASE DATE	DISCUSSION NOTES FROM CONFERENCE CALL (OCTOBER 25, 2011)	NEXT STEP FOR AGENCY
Appears close to completion	Appears close to completion	MID-FRANKLIN YARD	<a href="#">T0604700021</a>	ERIC SWENSON	Gasoline	G - Government Entity (include School, Hospital, Utility)	7/30/1986	* Case is near closure (in 30-days closure process)	Complete closure process in 1-year (includes well decommission)
Appears near completion within 1-year	CLOSED (12/9/2010)	LARRY'S SHELL SERVICE	<a href="#">T0604700045</a>	ERIC SWENSON	Gasoline	Z - Major Oil Company	10/20/1987	CLOSED (12/9/2010)	CLOSED (12/9/2010)
Appears to be stuck	Appears to be on track	VIC FIGUEROA MOTORS	<a href="#">T0604700123</a>	ERIC SWENSON	Gasoline	S - Small Private Business	9/1/1988	<ul style="list-style-type: none"> <li>* Site located in a low income community</li> <li>* Accepted to the 2011/12 EAR Program Funding</li> <li>* Site assessment activities started on October 13, 2011 (RP funded the task)</li> <li>* RP is responsive</li> <li>* No current petroleum usage</li> </ul>	Push for new/additional remedial investigation (RI)/risk assessment <b>(Submittal of site assessment report)</b>

# **Attachment 1**

**Draft Report (June 10, 2010)**

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

**The contents of this attachment are provided in electronic format only**

# **Draft**

**June 10, 2010**

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

**Merced County  
Local Oversight Program  
(LOP) Cases**

**Prepared as in-kind task as part of  
Cooperative Agreement LS-96934701-1 between  
USEPA Region 9 and  
the California State Water Resources Control Board**

# CONTENTS

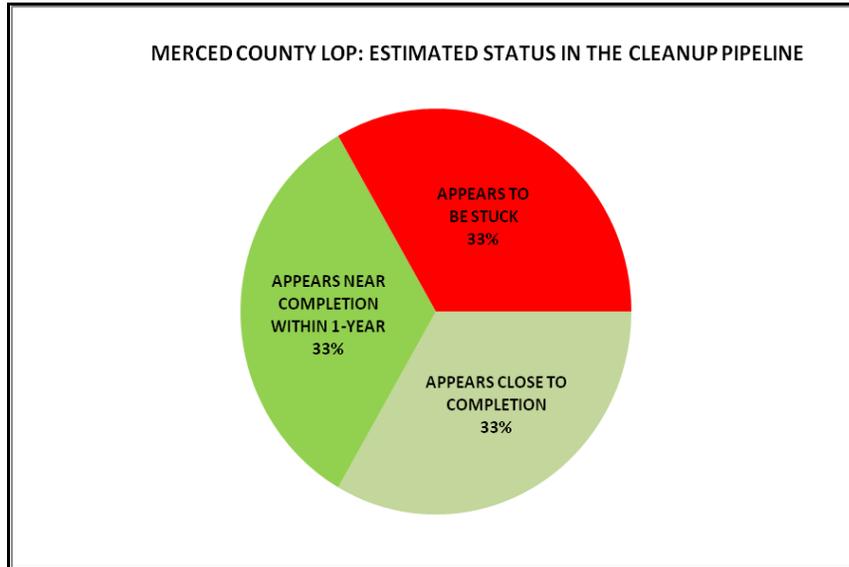
<b>Section</b>	<b>Page</b>
<b>Case Review Analysis .....</b>	<b>1</b>
<b>Case Review Summary Table .....</b>	<b>3</b>
<b>Case Location Map .....</b>	<b>4</b>
<b>Case Review Power Point Slides – Site List</b>	
1. T0604700021 (Mid-Franklin Yard)	
2. T0604700045 (Larry’s Shell Service)	
3. T0604700123 (Vic Figueroa Motors)	

**MERCED COUNTY LOCAL OVERSIGHT PROGRAM (LOP) OPEN LEAKING UST: NON-CUF, OLDER (OPEN>15 YEARS), AND DEEMED “NOT READY FOR CLOSURE – FINAL” CASES IN GEOTRACKER (DATA IN GEOTRACKER, JUNE 2010)**

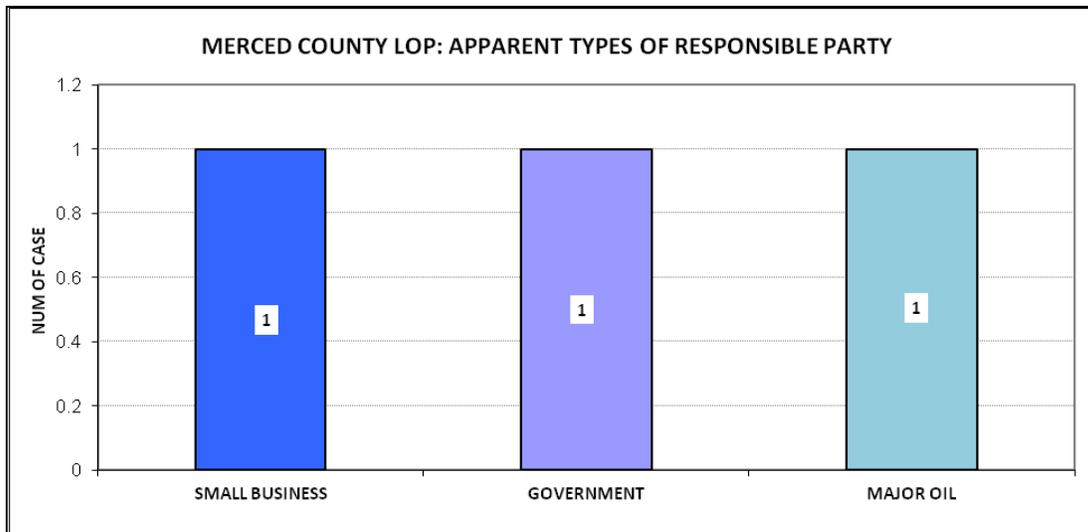
**SUMMARY OF CASE REVIEW**

TOTAL NUMBER OF CASES REVIEWED = 3 CASES  
 NUMBER OF ACTIVE LUST CASE ON JUNE 1, 2010 = 63 CASES

1) APPARENT STATUS OF CASES REVIEWED



2) RESPONSIBLE PARTY TYPES

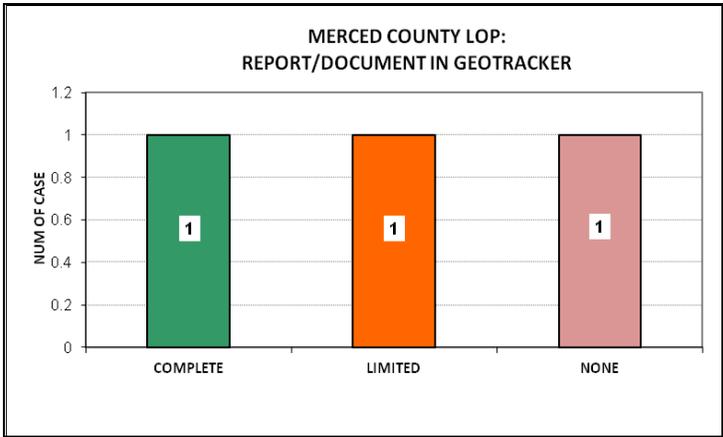
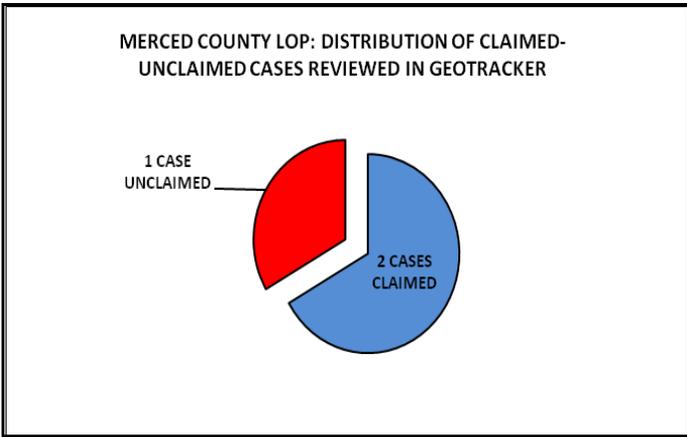


3) APPARENT MAIN BARRIERS (ENVIRONMENTAL AND NON-ENVIRONMENTAL) TO CLOSURE

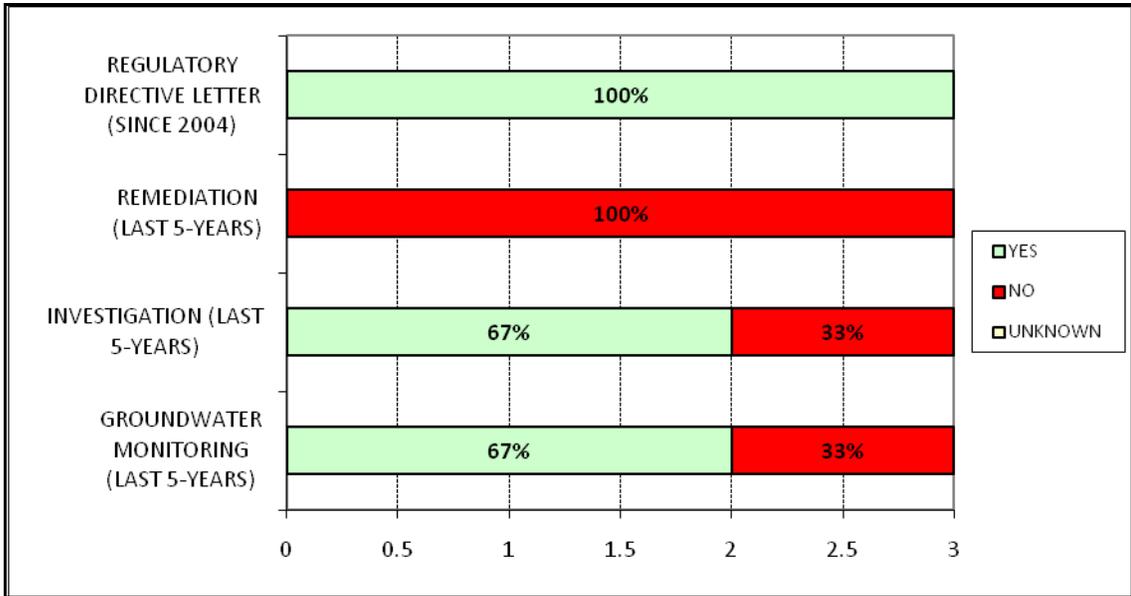
RANK	ENVIRONMENTAL	NUM OF CASE	% OF CASE REVIEWED
-	INCOMPLETE ASSESSMENT	1	33%
-	REMEDIAL CONFIRMATION	1	33%
-	OTHER	1	33%

RANK	NON-ENVIRONMENTAL	NUM OF CASE	% OF CASE REVIEWED
-	NON-RESPONSIVE RP	1	33%
-	NONE	1	33%
-	OTHER	1	33%

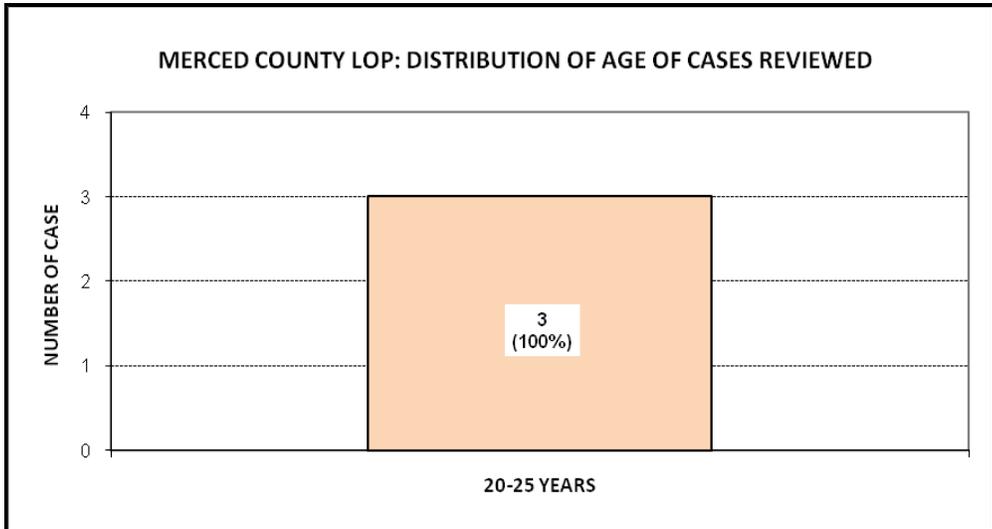
4) DATA IN GEOTRACKER



5) CASE ACTIVITIES IN GEOTRACKER (2004-2009)

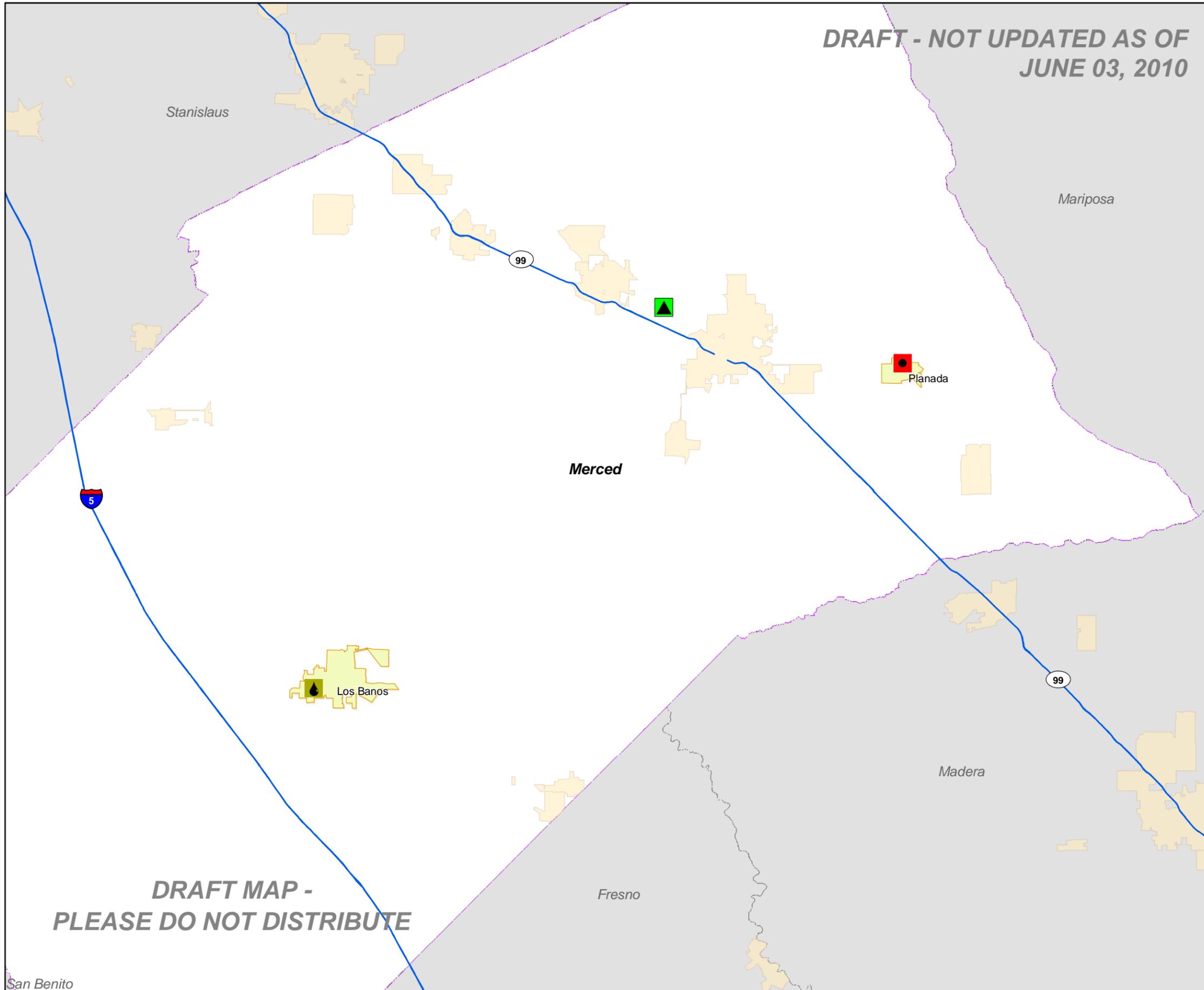


6) AGE OF CASES



ESTIMATED STATUS IN THE CLEANUP PIPELINE?	SITE NAME (CASE LEAD AGENCY: MERCED COUNTY LOP)	CITY	GLOBAL ID	LOCAL CASE NUMBER	CASEWORKER	CURRENT CASE STATUS	APPARENT PRIMARY ENVIRONMENTAL BARRIER TO CLOSURE (Identified by Regulatory Agency in GT)	APPARENT NON-ENVIRONMENTAL BARRIER TO CLOSURE (Identified by Regulatory Agency in GT)	PRIMARY COC (In GeoTracker)	APPARENT TYPE OF RP	DOES SITE APPEAR TO HAVE BEEN REDEVELOPED? (LAND USE CHANGED)	DOES SITE APPEAR TO HAVE CURRENT PETROLEUM USAGE?	CLAIMED IN GEOTRACKER?	GROUNDWATER MONITORING (LAST 5-YEARS)	INVESTIGATION (LAST 5-YEARS)	REMEDIATION (LAST 5-YEARS)	LAST REGULATORY DIRECTIVE LETTER (ANY ISSUED SINCE 2004?)	PERCEPTION OF NEED FOR INCREASED ENFORCEMENT?	DATA IN GEOTRACKER	RELEASE DATE	AGE	NEXT STEP FOR AGENCY
Appears close to completion	MID-FRANKLIN YARD	MERCED	<a href="#">TD604700021</a>	2461	ERIC SWENSON	Open - Verification Monitoring	O - Other	O - Other	Gasoline	G - Government Entity (include School, Hospital, Utility)	Unknown	Unknown	Yes	Yes	Yes	No	Yes	Yes	Limited	7/30/1986	23	
Appears near completion within 1-year	LARRY'S SHELL SERVICE	LOS BANOS	<a href="#">TD604700045</a>	2417	ERIC SWENSON	Open - Site Assessment	R - Remedial Confirmation	N - None	Gasoline	Z - Major Oil Company	No	Yes	Yes	Yes	Yes	No	Yes	Yes	Partially Complete (Missing some data) Complete	10/20/1987	22	
Appears to be stuck	VIC FIGUEROA MOTORS	PLANADA	<a href="#">TD604700123</a>	2490	ERIC SWENSON	Open - Inactive	I - Incomplete Assessment	RP - Non-Responsive RP	Gasoline	S - Small Private Business	No	Yes	No	No	No	No	Yes	Yes	None	9/1/1988	20	

**DRAFT - NOT UPDATED AS OF  
JUNE 03, 2010**



-  G - Government Entity (Utility etc.)
-  Z - Major Oil Company
-  S - Small Private Business
-  Appears close to completion
-  Appears near completion within 1-year
-  Appears to be stuck
-  City Containing Featured UST
-  Other City
-  Merced County
-  Other County
-  Highway



**DRAFT MAP -  
PLEASE DO NOT DISTRIBUTE**

**GeoTracker Data Visualization**  
**MERCED COUNTY LOP**  
**GEOTRACKER LOCATIONS OF NON-CUF CASES**  
**OLDER THAN 15 YEARS DEEMED**  
**"NOT READY FOR CLOSURE - FINAL"**  
Draft Merced County LOP Non-CUF Report

# MID-FRANKLIN YARD (T0604700021)

## 3321 FRANKLIN ROAD, MERCED, CA 95340



**Case Age:** 23 years  
**Primary COC:** Gasoline  
**RP Identified:** Merced Irrigation District  
**Potential Media Affected:** Aquifer used for drinking water supply  
**Current Land Use:** Construction Yard for Irrigation District

**CLEANUP OVERSIGHT AGENCIES**  
 MERCED COUNTY LOP (LEAD) - CASE #: 2461  
 CASEWORKER: [ERIC SWENSON](#) - SUPERVISOR: Bill Peeler, Supervising EHS  
 CENTRAL VALLEY RWQCB (REGION 5F) - CASE #: 5T24000095  
 CASEWORKER: [WARREN GROSS](#) - SUPERVISOR: John Noonan

### Possible Reasons Why This Case Is So Old (Based on Agency's Feedback)

- Decision by regulatory agency to not require active cleanup at site following release of Lawrence Livermore study
- Slow response by RP to regulatory directives
- Site part of concurrent non-LOP investigation cleanup relating to surface spillage and discharge, burial of waste, and other issues

NOTE: Data queried from GeoTracker and reviewed in May 2010

ACTIVITIES REPORT		ACTIVITY TYPE FILTER: <input type="button" value="Show All Activities"/>
ACTION TYPE	ACTION	ACTION DATE
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	7/23/2009
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	8/13/2007
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	3/1/2007
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	5/3/2005
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	10/21/2003
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	7/23/2003
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	7/3/2003
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	11/6/2002
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	8/8/2002
CLEANUP ACTION	<a href="#">Excavate and Treat</a>	6/2/1993
LEAK ACTION	<a href="#">Leak Stopped</a>	8/12/1986
LEAK ACTION	<a href="#">Leak Reported</a>	8/10/1986
LEAK ACTION	<a href="#">Leak Discovery</a>	7/30/1986

## Activities Conducted to Date Based on GeoTracker

T0604700021

### Assessment last 5 years

- 2008: Soil-gas investigation
- 2006: Monitoring
- 2005: Soil and GW site assessment

### Remediation last 5 years

- None

### Assessment older than 5 years

- None

### Remediation older than 5 years

- 1993: Excavate and Treat

# IMPEDIMENTS TO CLOSURE T0604700021

as reported by regulatory agency

MID-FRANKLIN YARD (T0604700021) - (MAP)		
3321 FRANKLIN RD MERCED, CA 95340 MERCED COUNTY LUST CLEANUP SITE	CLEANUP OVERSIGHT AGENCIES MERCED COUNTY LOP (LEAD) - CASE #: 2461 CASEWORKER: ERIC SWENSON CENTRAL VALLEY RWQCB (REGION 5F) - CASE #: 5T24000095 CASEWORKER: WARREN GROSS	
Summary	Closure Review	Cleanup Status History
Regulatory Activities	Environmental Data (ES)	Site Maps / Documents
Community Involvement		
CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 8/11/2009 <a href="#">VIEW ALL POSSIBLE CLOSURE REVIEW VALUES</a>		
IMPEDIMENTS TO CLOSURE		
PROCEDURAL IMPEDIMENTS		
• Non-Responsive and / or Recalcitrant Responsible Party - Awaiting closure request summary report from Responsible Party.		
BENEFITS OF ADDITIONAL WORK		
• Other - Additional work may not be required. Awaiting closure request summary report from Responsible Party.		
SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT		
SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Domestic Wells	Undetermined	Awaiting closure request summary report from Responsible Party.

## Review Conclusions T0604700021

- Review indicates:
  - Closure report indicates “Awaiting closure request summary report from RP” → UST petroleum site can be closed when site closure report is submitted
  - Remaining degraded gasoline under building is not likely adding significant vapor intrusion from TCE contamination
- Discussion:
  - Complete the closure
- Potential closure candidate

# LARRY'S SHELL SERVICE (T0604700045)

## 849 PACHECO BLVD, LOS BANOS, CA 93635



**Case Age:** 22 years  
**Primary COC:** Gasoline  
**RP Identified:** Shell Oil  
**Potential Media Affected:** Aquifer used for drinking water supply  
**Current Land Use:** Gas Station

**CLEANUP OVERSIGHT AGENCIES**  
 MERCED COUNTY LOP (LEAD) - CASE # 2417  
 CASEWORKER: [ERIC SWENSON](#) - SUPERVISOR: Bill Peeler, Supervising EHS  
 CENTRAL VALLEY RWQCB (REGION 5F) - CASE #: 5T24000177  
 CASEWORKER: [WARREN GROSS](#) - SUPERVISOR: John Noonan



**CASE CLOSED ON  
 DEC 9, 2010**

### Possible Reasons Why This Case Is So Old

- 10 years passed before remediation was undertaken
- High benzene in soil vapor
- Proximity to municipal well (>10 years to impact)

NOTE: Data queried from GeoTracker and reviewed in May 2010

ACTIVITIES REPORT		ACTIVITY TYPE FILTER: <input type="button" value="Show All"/>
ACTION TYPE	ACTION	ACTION DATE
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	8/6/2009
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	7/20/2009
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	3/24/2009
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	2/5/2009
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	12/18/2008
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	7/29/2008
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	8/17/2006
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	7/14/2005
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	1/3/2005
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	3/5/2004
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	6/7/2002
LEAK ACTION	<a href="#">Leak Reported</a>	10/20/1987
LEAK ACTION	<a href="#">Leak Stopped</a>	2/5/1987
LEAK ACTION	<a href="#">Leak Discovery</a>	2/4/1987

## Activities Conducted to Date Based on GeoTracker (T0604700045)

### Assessment last 5 years

- 2009: Site investigation and Feasibility study
- Since 2005: Many assessments and monitoring activities

### Remediation last 5 years

- NONE
- (MNA recommended in 2009)

### Assessment older than 5 years

- Since 2001: Monitoring

### Remediation older than 5 years

- 1988: Remediation

# IMPEDIMENTS TO CLOSURE (T0604700045)

as reported by regulatory agency

<b>LARRY'S SHELL SERVICE (T0604700045) - [MAP]</b>						
849 PACHECO BLVD LOS BANOS, CA 93835 MERCED COUNTY LUST CLEANUP SITE	<b>CASE CLOSED ON DEC 9, 2010</b>	<b>CLEANUP OVERSIGHT AGENCIES</b> MERCED COUNTY LOP (LEAD) - CASE #: 2417 CASEWORKER: FRIC SWENSON CENTRAL VALLEY RWQCB (REGION 5F) - CASE #: 5724000177 CASEWORKER: WARREN GROSS				
Summary	Closure Review	Cleanup Status History	Regulatory Activities	Environmental Data (ESI)	Site Maps / Documents	Community Involvement
CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 7/27/2009 <a href="#">VIEW ALL POSSIBLE CLOSURE REVIEW VALUES</a>						
<b>IMPEDIMENTS TO CLOSURE</b>						
<b>UNACCEPTABLE RISK</b>						
• Unacceptable Risks to Human Health from Vapor Intrusion - <i>High benzene concentration in soil vapor.</i>						
<b>BENEFITS OF ADDITIONAL WORK</b>						
• Remove / Reduce Source Mass - <i>High benzene concentration in soil vapor.</i>						
<b>SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT</b>						
<b>SENSITIVE RECEPTOR</b>	<b>TIME FRAME FOR IMPACT</b>	<b>COMMENTS</b>				
Municipal Well	> 10 Years	No impacts identified.				

## GROUNDWATER MONITORING FREQUENCY

# OF WELLS MONITORED - SEMI-ANNUALLY : 6

## Review Conclusions T0604700045

- Review indicates:
  - Consultant recommended monitored natural attenuation
  - Closure review indicates unacceptable risk from vapor intrusion (benzene)
  - Subsurface investigation on Sept 2009 indicated no benzene or fuel oxygenates detected in soil samples collected and no TPH-g detected in majority of the soil samples (maximum at 130-ppm)
- Discussion:
  - Cleanup closure timeline (site is currently an active gas station)
- Potential closure consideration

# VIC FIGUEROA MOTORS (T0604700123)

9075 HWY 140 E, PLANADA, CA 95365



**Case Age:** 20 years

**Primary COC:** Gasoline

**RP Identified:** Jose Rodriguez – **Unclaimed in GeoTracker**

**Potential Media Affected:** Aquifer used for drinking water supply

**Current Land Use:** ~~Gas Station~~ Automotive and tire repair facility

**CLEANUP OVERSIGHT AGENCIES**

MERCED COUNTY LOP (LEAD) - CASE #: 2490

CASEWORKER: [ERIC SWENSON](#) - SUPERVISOR: Bill Peeler, Supervising EHS

CENTRAL VALLEY RWQCB (REGION 5F) - CASE #: 5T24000261

CASEWORKER: [WARREN GROSS](#) - SUPERVISOR: John Noonan

**Possible Reasons Why This Case Is So Old**

- Tanks removed in 1988 and no follow up to suspected release conducted
- Non-responsive party

ACTIVITIES REPORT		ACTIVITY TYPE FILTER: Show All Activities		* INDICATES A REVISED DUE DATE	
ACTION TYPE	ACTION	ACTION DATE	RECEIVED / ISSUE DATE	ACTION DESCRIPTION	
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	1/6/2009	1/6/2009	Need for Corrective Action	
ENFORCEMENT/ORDERS	<a href="#">* Historical Enforcement</a>	4/19/2005	4/19/2005	Notice of Responsibility-New Property Owner	
ENFORCEMENT/ORDERS	<a href="#">Staff Letter</a>	3/10/1998	3/10/1998		
LEAK ACTION	<a href="#">Leak Reported</a>	7/26/1989			
OTHER REGULATORY ACTIONS	<a href="#">Technical Correspondence / Assistance / Other</a>	10/2/1988	10/2/1988	Tank Removal Report	
LEAK ACTION	<a href="#">Leak Discovery</a>	9/1/1988			
LEAK ACTION	<a href="#">Leak Stopped</a>	9/1/1988			

NOTE: Data queried from GeoTracker and reviewed in May 2010

## Activities Conducted to Date Based on GeoTracker (T0604700123)

**Assessment last 5 years**

- 2011: On-going assessment
- 2009: Agency letter requesting need for corrective action

**Remediation last 5 years**

- NONE

**Assessment older than 5 years**

- 1988: Tanks removal – soil and water sample taken

**Remediation older than 5 years**

- NONE

# IMPEDIMENTS TO CLOSURE T0604700123

as reported by regulatory agency

## VIC FIGUEROA MOTORS (T0604700123) - (MAP)

9075 HWY 140 E  
PLANADA, CA 95365  
MERCED COUNTY  
LUST CLEANUP SITE

CLEANUP OVERSIGHT AGENCIES  
MERCED COUNTY LOP (LEAD) - CASE #: 2490  
CASEWORKER: ERIC SWENSON  
CENTRAL VALLEY RWQCB (REGION 5F) - CASE #: 5T24000261  
CASEWORKER: WARREN GROSS

Summary Closure Review Cleanup Status History Regulatory Activities Environmental Data (ESI) Site Maps / Documents Community Involvement

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 7/27/2009

[VIEW ALL POSSIBLE CLOSURE REVIEW VALUES](#)

### IMPEDIMENTS TO CLOSURE

#### SITE ASSESSMENT INCOMPLETE

- Incomplete Conceptual Site Model (CSM) - *No site assessment.*
- Pollutant Sources Have Not Been Adequately Identified or Evaluated - *No site assessment.*
- Extent of Contamination Has Not Been Determined - *No site assessment.*
- Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *No site assessment.*
- Sensitive Receptor Survey Has Not Been Completed - *No site assessment.*

#### PROCEDURAL IMPEDIMENTS

- Non-Responsive and / or Recalcitrant Responsible Party - *Responsible party has completed no directed action.*

#### BENEFITS OF ADDITIONAL WORK

- Fill-in RI Data Gaps - *No site assessment.*

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

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Domestic Wells	Undetermined	No site assessment.

## Review Conclusions T0604700123

- Review indicates:
  - Limited document/report available in GeoTracker
  - Tank removal report in 1988 indicated (1) NDs for soil samples, and (2) groundwater collected from tank pit detected TPH-g (630-ppb), benzene (25-ppb), toluene (71-ppb) and xylenes (140-ppb)
  - Letter from Merced County in Jan 2009 to RP requesting “Need for Corrective Action”
  - Agency letter in 2011 proposing nomination into Emergency Abandoned and Recalcitrant Program
  - Agency indicated: (i) no fuel has been dispensed at this facility for some time, and (ii) site assessment is currently on-going
  - Agency indicated: *“During site assessment work on October 13, 2011, a previously unknown leak from the former fuel dispenser island was found. This leak likely contributed to groundwater contamination found during tank removal in 1988. Groundwater sampling scheduled for week of November 7, 2011.”*
- Discussion:
  - RP compliance and possible closure (tank removal results, age of case, current land use)
- Possible closure candidate pending confirmation sampling