Final
October 6, 2011

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

Santa Barbara County
Local Oversight Program

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
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Executive Summary

The Draft version of this report was submitted on September 30, 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, disputing potential RPs, and complexity of cases. As recommended by USEPA, the agency agreed to talk with their Regional Quality Control Board (RWQCB) to provide interim assistance with the complex sites. Santa Barbara County had three (3) sites that had unresponsive RPs: two of the sites were Caltrans Sites.

One of the sites, Ellis Property (T0608300247), has been closed since the last review. Additionally, there are five sites that are on track to be closed within one-year or less (Mercury Air Center, USCB Bldg 336-Tank 2, Trojan Petroleum, UCSB Bldg 577-Tank 6, and Santa Maria Airport Dist ERA). One of the cases is a duplicate case and the agency is going to work with Hamid Foolad of the State Water Resources Control Board (SWRCB), S.B. City Fire Station #1 – Diesel.
Santa Barbara County LOP

Apparent Case Status – Initial and After

TOTAL NUMBER OF CASES REVIEWED = 18
NUMBER OF ACTIVE LUST CASES ON NOVEMBER 1, 2010 = 214 CASES
DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON September 30, 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 (09-30-2010)</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>2</td>
</tr>
<tr>
<td>Appears near completion within 1-year</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Appears to be on track</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Appears NOT to be on track</td>
<td>7</td>
<td>3</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>7</td>
<td>4</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>1</td>
</tr>
</tbody>
</table>
Initial Assessment Percentage of Cases (09-30-2010)

Post Meeting Assessment Percentage of Cases (08-30-2011)
**CASE REVIEW SUMMARY TABLE**

**SANTA BARBARA COUNTY LOCAL OVERSIGHT PROGRAM**

<table>
<thead>
<tr>
<th>ESTIMATED STATUS IN THE CLEANUP PROCESS</th>
<th>CHANGE IN STATUS IN THE CLEANUP PROCESS ON 08/30/2011</th>
<th>SITE NAME (CASE FROM SANTA BARBARA COUNTY LOP)</th>
<th>GLOBAL ID</th>
<th>CASE WORKER</th>
<th>PRIMARY CPC (Go Geo Today)</th>
<th>APPEARANCE TYPE OF RP</th>
<th>RELEASE DATE</th>
<th>DISCUSSION/NOTES FROM MEETING/CALL (08/30/2011)</th>
<th>NEXT STEP FOR AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appears near completion within 1-year</td>
<td>Appears near completion within 1-year</td>
<td>Mercury Air Center</td>
<td>T61050408</td>
<td>ESN</td>
<td>Multiple</td>
<td>S - Government Entity (include School, Hospital, Utility)</td>
<td>5/9/1988</td>
<td>The caseworker indicated that there are two separate UST sites, a fuel farm area and maintenance hangar. The caseworker recently received info from the consultant on the 2nd hangar area. Last sampling event there was some info needs uploaded to GT. Historical ge impacts, need to review case and discuss with Tom and send to RB for closure approval. Just waiting on the wells in the fuel farm area to be abandoned. Ready for closure within one year.</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
</tr>
<tr>
<td>Appears near completion within 1-year</td>
<td>Appears near completion within 1-year</td>
<td>UCSB Bldg 310, Tank 2</td>
<td>T61050408</td>
<td>ESN</td>
<td>Multiple</td>
<td>S - Government Entity (include School, Hospital, Utility)</td>
<td>6/1/1988</td>
<td>The caseworker indicated that a large excavation was done on campus around the facilities management office; the consultant also did some groundwater monitoring. The results from the last few events were near closure levels. Some residual low levels of EDC and MTBE exist. The caseworker stated that the USTs were pulled and replaced and now a large AST exists over the historical excavation area. The caseworker said that they will go to the Regional Board requesting closure. This case is considered Closeable within one year.</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
</tr>
<tr>
<td>Appears near completion within 1-year</td>
<td>Appears close to completion</td>
<td>Trojan Petroleum Inc</td>
<td>T61050408</td>
<td>ESN</td>
<td>Gasoline</td>
<td>S - Small Private Business</td>
<td>4/8/1990</td>
<td>Caseworker noted that the RP recently uploaded the latest data. Caseworker stated that the only thing that needs to be done is create the closure summary report and provide to RB for concurrence. It is a soils-only case. The case should be &quot;Closed by the end of next week&quot;.</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
</tr>
<tr>
<td>Appears to be on track</td>
<td>Appears NOT to be on track</td>
<td>Mission Ureen Supply</td>
<td>T61050408</td>
<td>NPW</td>
<td>Multiple</td>
<td>1 - Industry (Refined, Steel etc)</td>
<td>9/8/1988</td>
<td>Caseworker indicated that this case is still in the middle of the petition process for closure to the Board but agency does not agree that the case is ready for closure. This case is considered Not on Track.</td>
<td>Push for additional/alternate remediation (current remediation ineffective)</td>
</tr>
<tr>
<td>Appears NOT to be on track</td>
<td>Appears to be on track</td>
<td>Jet Gas Station</td>
<td>T61050408</td>
<td>TAM</td>
<td>Gasoline</td>
<td>2 - Major Oil Company</td>
<td>11/5/1987</td>
<td>The caseworker noted that the lithology in the area is extremely variable and that there historically have been a couple of wells that have contained free product. There was a remediation system in place and that the consultant was going through the permitting process currently and that the remediation system will be reengaged in the 4th quarter of 2011. The caseworker noted that there is still no access to the downgradient site to install a downgradient well and that the CalTrans right-of-way is not large enough to get equipment in to install a well. The downgradient site property owner refused access to their property. The caseworker said that they might consider just inserting a hydropunch in the CalTrans right-of-way instead of a full on well installation. The caseworker said that they don't know what additional measures to take to make the property owner grant access. The caseworker said that they will contact the Regional Board to see if they can assist with the property access issue. Besides the access issue, this case appears to be on track.</td>
<td>Push for new/additional remediation investigation (RIP)(RIP) assessment</td>
</tr>
</tbody>
</table>

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**Final Review of LUST Cases, Not in the CUF and Over 15 Years, Santa Barbara County LOP**

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The caseworker said that Caltrans historically had a bunker fuel tank at the site and that a freeway was built on top of the area. There is an access area to put a drill rig on the site in order to conduct additional assessment. Historically there has been oil contamination in this area. The agency stated that they need to look at this site in further detail to see if it might be closeable. They said that the groundwater plume is probably stable; however, there might be a potential groundwater issue if Caltrans does any future groundwater extraction. The caseworker said that they might consider establishing an agreement that if any waste disposal is done in the future the water must be analyzed by Caltrans before doing so, and thus establish some restrictions on the land. This might be closeable with a deed restriction, any pumped water needs to be tested. This case remains not on Track until next steps for dealing with site are determined.

The caseworker stated that historically this case was in the FUND and that either the RP exhausted the FUND or the RP went out of business. The caseworker said that Manfar associates were the original RP and that Exxon Mobil got involved as the RP recently. Exxon is now doing the work out there. The delay is that there is a list of oil contamination but EXXON does not have access to these other private properties. The caseworker indicated that this is not a high priority site for EXXON. Redevopers want to develop the site but pull off site assessment and remediation is necessary before issuance can be granted. This site is "NOT ON TRACK".

The caseworker noted that site assessment work was conducted on August 22nd. This case is On Track.

The caseworker indicated that the RP submitted another report containing requested cross sections in it. The caseworker needs to review the report. This case is a soils only case and the caseworker will review all files to see if it is closeable. This case is On Track.

The caseworker indicated that this is a complicated site and that they could potentially use some assistance from the Regional Board in terms of strategizing on how to deal with this site and said that they might would meet with the Regional Board to discuss. Work is being conducted currently, consultants recently put in a new air sparging well. This case is On Track.

Site was closed on 03/31/2011.

Case Closed
<table>
<thead>
<tr>
<th>ESTIMATED DATE IN THE CLEANUP PREVIEW</th>
<th>CHANGE IN STATUS IN THE CLEANUP PIPELINE ON 08/30/2011</th>
<th>FILLER FOR LOCAL AGENT: SANTA BARBARA COUNTY (LP)</th>
<th>GLOBAL ID</th>
<th>CASE WORKER</th>
<th>PRIMARY LOC (if applicable) APPARENT TYPE OF BP</th>
<th>REFILE DATE</th>
<th>DECISION NOTES FROM MEETING/Call (08/30/2011)</th>
<th>NEXT STEP FOR AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appears to be stuck</td>
<td>Appears close to completion</td>
<td>UCSB Bldg 577; Tank 4</td>
<td>ESNI</td>
<td>Diesel</td>
<td>G - Government Entity (Include School, Hospital, Utility)</td>
<td>6/7/2008</td>
<td>The caseworker indicated that this site historically had a Fuel Tank that the Old Marine Science Lab built for their research boats. The tank was pulled years ago. The site location is out by campus point. During the expansion of the Marine Science Lab building the site was built over and as part of the expansion the ground had been basically scraped down to bedrock. The caseworker assumes that if there is any contamination remaining it is just residues and that all of the contamination went away when the construction contractors put in the footing for the building. The caseworker said that he will prepare a closure summary to submit to the board and that he thinks that it could be closeable within three months. This case is considered “Close to Completion”</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>Appears to be stuck</td>
<td>UCSB Bldg 515; Tank 10</td>
<td>ESNI</td>
<td>Gasoline</td>
<td>G - Government Entity (Include School, Hospital, Utility)</td>
<td>6/17/2008</td>
<td>The caseworker indicated that the site is located in the facilities management area of UCSB, near building 1, and encompasses a large parking lot area. The caseworker said that additional research work needs to be done for this site and might have to gather information from an adjacent site. There has been some overextraction done at the site but currently the agency doesn’t have the report that indicates what impacts were historically there and need to find records that verify that contaminated areas have been removed. The caseworker has contacted the former consultant, who could not present adequate data to confirm excavation and verification sampling. The caseworker will send a letter requesting the data from the RP contact, and will continue to research the agency records. If the records are not found the caseworker shall require several verification borings in the area. This case remains STUCK.</td>
<td>Push for new/additional remedial investigation (R/I) risk assessment</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>Appears to be stuck</td>
<td>Tony’s Body and Fender</td>
<td>NPW</td>
<td>Gasoline</td>
<td>S - Small Private Business</td>
<td>1/24/2009</td>
<td>The caseworker was not sure if this is really a LUST site or not. He will need to research this site and will follow-up with USEPA. This case remains STUCK</td>
<td>Verify if the case is warranted (i.e., is a Federal UST case)</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>Appears near completion within 1-year</td>
<td>Santa Maria Airport Dist ERA</td>
<td>ESNI</td>
<td>Multiple</td>
<td>G - Government Entity (Include School, Hospital, Utility)</td>
<td>1/24/2009</td>
<td>The caseworker stated that there was a waste oil tank at the site and that the airport district leased out hangars to other businesses and the tank at the site was from one of the businesses. There has been no documentation of removing anything so the caseworker assumes that all contamination was left in place until the Airport District had the hangar torn down and at all that time confirmation samples were collected. The caseworker indicated that the concentrations found in the material hauled off during the verification samples looked pretty clean but that he needed to revisit the report and take a look again. The agency will prepare a closure summary report and request closure from the Board. Also, the caseworker said that he will follow-up with the RP regarding uploading necessary documents to GeoTracker. The agency said that this site will be closed within the next quarter by the end of 2011. This case is deemed closeable within one year.</td>
<td>Complete closure process in 1 year (includes well decommission)</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>OTHER--DUPLICATE CASE</td>
<td>SB City Fire Station #1; Diesel</td>
<td>NPW</td>
<td>Diesel</td>
<td>G - Government Entity (Include School, Hospital, Utility)</td>
<td>1/28/2009</td>
<td>Caseworker said that this is a duplicate case with SB City Fire Station #1. This case needs to be deleted in GeoTracker and they need to talk to Hamid Foulad (SWRCB) about deleting this case.</td>
<td>Delete Case</td>
</tr>
</tbody>
</table>

**Final Review of LUST Cases, Not in the CUF and Over 15 Years, Santa Barbara County LOP**
### Final Review of LUST Cases, Not in the CUF and Over 15 Years, Santa Barbara County LOP

<table>
<thead>
<tr>
<th>ESTIMATED STATUS IN THE CLEANUP PIPELINE</th>
<th>CHANGE IN STATUS IN THE CLEANUP PIPELINE ON 08/30/2011</th>
<th>CASE MAKE AND BREAK, SANTA BARBARA COUNTY LOP</th>
<th>GLOBAL ID</th>
<th>CASE WORKER</th>
<th>A PARENT TYPE OF RP</th>
<th>RELEASE DATE</th>
<th>DISCUSSION NOTES FROM MEETING/CALL (08/30/2011)</th>
<th>NEXT STEPS FOR AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appears to be stuck</td>
<td>Appears to be stuck</td>
<td>Ingram Paper</td>
<td></td>
<td>Primary</td>
<td>Gasoline</td>
<td>4/20/1989</td>
<td>The caseworker said that he met with the potential RP recently. He indicated that this was a small site and that the tank was installed in 1956 and was removed in either 1989 or 1990. During the removal there was a small amount of contamination observed. No assessment or work was done on this case for several years and the caseworker is currently trying to get the RP to do some work. The caseworker said that the corporation should be the RP instead of the current property owner and that the agency needs to figure out if they are pegging the correct person as the RP. The caseworker believes that the contamination has had very minimum impact to groundwater. Currently the caseworker will hold onto the work plan and not review it until a final determination is made on who is the RP. This case remains STUCK.</td>
<td>Ensure RP compliance (includes identity RP, enforcement, EAR account etc)</td>
</tr>
<tr>
<td>Appears to be stuck</td>
<td>Appears to be stuck</td>
<td>CalTrans Barston Maintenance Yard</td>
<td></td>
<td>Primary</td>
<td>Diesel</td>
<td>7/3/1992</td>
<td>The caseworker said that they have not received a response from CalTrans District 5 regarding working on this site. There was a small tank at the site and samples that were collected around the tank area were clean but there were some runs that led to dispenser and around the dispenser area there was some hits of contamination. The agency would like some verification geoprobe samples taken or even some grab samples from backhoe in that area to confirm that significant contamination does not remain. Agency will speak again to the CalTrans district office because further assessment is still needed. CalTrans is considered a recalcitrant RP and this case remains STUCK.</td>
<td>Ensure RP compliance (includes identity RP, enforcement, EAR account etc)</td>
</tr>
</tbody>
</table>
Attachment 1:

Case Review Power Point Slides from Draft Report

The contents of this attachment are provided in electronic format only.
MERCURY AIR CENTER (T0608300082)
404 MOFFETT PL, GOLETA, CA 93117

Case Age: 22 years
RP Identified by Regulator: CITY OF S.B/ S.B. MUNICIPAL AIRPORT
Primary COC: AVIATION
Current Land Use: Not changed

Possible Reasons Why This Case Is So Old
• Leak reported in 1988, USTs stored aviation gasoline and jet A fuel until 12/1998 and later system removed in 2002.
• Free product historically detected, manually removed from 1996 to 2002 – thickest layer measured in 1997 was 4.02 ft.
• Elevated levels of MTEB and TBA still detected in 2002 and these plumes not yet defined at that point.

NOTE: Data queried from GeoTracker and reviewed in September 2010

Activities Conducted to Date Based on GeoTracker Info T0608300082

Assessment last 5 years
• Additional MWs installed 2005 and continued groundwater monitoring

Assessment older than 5 years
• Soil sampling, vapor survey, and 3 monitoring wells installed 1988
• Five vapor wells installed 1990
• Add. MWs installed 1991 and 1992, 1995
• Soil/GW investigation 6/2002

Remediation last 5 years
• None

Remediation older than 5 years
• UST system removed in 2002
• Manual removal of free product from 1996-2002
• Remedial dewatering, additional excavation, stockpile removed.
Review Conclusions  T0608300082


• Closure review dated 7/2010 indicates site is ready for closure, need to complete a case closure summary to RB, but that MWs need to be properly abandoned prior to case closure.


• **Discussion: Next step – case is ready for closure.** Agency is responsible for enforcing proper abandonment of MWs. It is now possible to close cases without proper well abandonment.
**UCSB BLDG 336, TANK 2 (T0608300568)**
2 UCSB BLDG 336, SANTA BARBARA, CA 93106

**Case Age:** 22 years  
**RP Identified by Regulator:** UCSB ENVIRONMENTAL HEALTH & SAFETY  
**Primary COC:** DIESEL, GASOLINE  
**Current Land Use:** Vehicle maintenance facility

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### Possible Reasons Why This Case Is So Old
- Two areas of soil contamination discovered during construction activities in 2000.
- No activities since 2006, awaiting well abandonment and preparation of case closure summary.
- Appears limited oversight, ongoing monitoring and sporadic investigations.

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### Activities Conducted to Date Based on GeoTracker Info T0608300568

#### Assessment last 5 years
- Ongoing monitoring until 2006

#### Remediation last 5 years
- None documented

#### Assessment older than 5 years
- Ongoing groundwater monitoring since 3/1989, several wells removed at time of UST excavation in 1993
- Ongoing monitoring and investigation in 2004

#### Remediation older than 5 years
- USTs removed in 10/1993 and over-excavated
- Additional soil excavation during area construction in 1995
- ORC injected in 2/2000 and socks removed in 2000
- Impacted soil excavated in 2000 and groundwater removed

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**NOTE:** Data queried from GeoTracker and reviewed in September 2010
IMPEDEMENTS TO CLOSURE  T0608300568
as reported by regulatory agency
CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 6/30/2010

IMPEDEMENTS TO CLOSURE
PROCEDURAL IMPEDEMENTS
Site Data And Reports Not Uploaded to Geotracker - A GeoMap needs to be uploaded as well as some other data.
Monitoring Wells Not Yet Abandoned - MWs need to be properly abandoned prior to case closure
Other Impediments
FPD needs to submit a case closure summary packet to the CC-RWQCB for concurrence.

BENEFITS OF ADDITIONAL WORK
Protect Designated Beneficial Uses - MWs need to be properly abandoned prior to case closure

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>Other</td>
<td>Undetermined</td>
<td>MWs need to be properly abandoned prior to case closure</td>
</tr>
</tbody>
</table>

NOTES / COMMENTS FPD shall prepare a case closure summary and send it to the CC-RWQCB before 9/30/2010. Upon concurrence approval FPD shall direct the proper abandonment of all MWs.

Review Conclusions  T0608300568

• Closure review dated 6/2010 indicates some information needed to be uploaded to GeoTracker and monitoring wells needed to be properly abandoned. Appears required data was uploaded.

• Agency indicated they will prepare a case closure summary for RB approval before 9/30/2010.

• Discussion: Next step – how to move this case toward closure? Agency is responsible for enforcing proper abandonment of MWs. It is now possible to close cases without proper well abandonment.
Possible Reasons Why This Case Is So Old

• Case not claimed and limited information uploaded by regulator.
• Historical LUSTIS Cleanup Action: Original case was UST removal and URF for diesel and gasoline spill in 4/1990.
• A drive-off spill occurred in 11/1996 and impacted surface soils were placed in existing bioremediation bin for treatment. After several years of bioremediation, the soil was spread on the parking lot, but no verification sample was collected prior to spreading on the ground.
• Appears no regulator involvement until 2002 correspondence with RP and then not again until 2009 site walk.

Activities Conducted to Date Based on GeoTracker Info

<table>
<thead>
<tr>
<th>Assessment last 5 years</th>
<th>Remediation last 5 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confirmation soil sample collected in 2010</td>
<td>None</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>Samples collected after UST removal and throughout the excavation process to delineate contamination in 1991</td>
<td>USTs removed in 4/1990 and soils excavated in 1991</td>
</tr>
<tr>
<td>1997 sampling after drive-off spill</td>
<td>Surface diesel spill in 1996, excavated soils, placed in bioremediation bin for several years</td>
</tr>
</tbody>
</table>
IMPEDEMENTS TO CLOSURE  T0608300727

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 6/24/2010

BENEFITS OF ADDITIONAL WORK
Verify Remedial Action Effectiveness - FPD has directed the responsible party to collect one verification sample to be able to close this site.

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>Storm drain (Runoff of contaminated soil)</td>
<td>Undetermined</td>
<td>Potential if contaminated soil was placed on the ground. This is why FPD would like one sample to be collected and analyzed before closing the site.</td>
</tr>
</tbody>
</table>

NOTES / COMMENTS
A drive off occurred and impacted surface soils that were excavated and placed in a bin for treatment. After several years of bioremediation, the soils were spread on the parking lot. No verification sample was collected prior to spreading on the ground. FPD has required one verification sample to be collected and analyzed. Upon acceptable results, FPD will close the site.

Review Conclusions  T0608300727

• USTs removed in 1990, site assessment activities conducted, and soil placed in bioremediation bins for several years. Appears sporadic regulatory oversight.

• Timeline from regulator indicated that on 6/22/1993, “LUFT: UST pit area called complete by Don Nelson on 6/13/1990” and regulator requested copies of lab results. In 12/1995, Regional Board directive to agency required sampling for VOCs at GW sites in LUFT, but appears only soil samples were historically collected. In 4/1996, regulator requested one soil sample in the north bin for TPHd and BTEX.

• Then, drive-off diesel spill occurred in 11/1996, estimated 100-150 gal released. Contaminated soils placed in the existing bioremediation bin(s) and timeline indicates “drive-off event – continue as same site #50647.” Appears no activities after 1997 sampling and meeting to discuss bio-treatment bin.

• Appears no regulator involvement until regulator corresponded with RP in 2002 and then not again until site visit in 12/2009.

• Closure review dated 6/2010 indicated one verification soil sample was requested and GeoTracker notes indicate a verification sample was collected on 7/7/2010 and regulator will prepare a case closure summary.

• Discussion: Next step – how to move this case toward closure? Appears closure summary is in progress and case is ready for closure.
MISSION LINEN SUPPLY (T0608300525)
619 MONTECITO ST E, SANTA BARBARA, CA

Case Age: 22 years
RP Identified by Regulator: MISSION LINEN SUPPLY
Primary COC: GASOLINE
Current Land Use: Warehouse and supply building located on site

Possible Reasons Why This Case Is So Old
• A 10,000 gal gasoline UST removed in 1988, elevated levels of contamination (including benzene and fuel oxygenates like MTBE, etc.) detected.
• Elevated levels of chlorinated compounds also detected and determined to be from off-site source.
• Many years of investigation and appears remedial activities began in 2002.

NOTE: Data queried from GeoTracker and reviewed in September 2010

Activities Conducted to Date Based on GeoTracker Info
T0608300525

Assessment last 5 years
• Ongoing monitoring and investigations
• 4Q’s of post-remediation GW sampling conducted

Remediation last 5 years
• Pump test conducted 2002 and remedial feasibility continued
• AS/SVE conducted from 2004 to 2006

Assessment older than 5 years
• Groundwater monitoring and investigations ongoing since 1988
• Phase II and III in 1991

Remediation older than 5 years
• UST removed in 1988 and contaminated soil/GW removed from UST pit in 1990
**IMPEDEMENTS TO CLOSURE T0608300525**

as reported by regulatory agency

**CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 5/19/2010**

**IMPEDEMENTS TO CLOSURE**

**SITE ASSESSMENT INCOMPLETE**

Pollutant Sources Have Not Been Adequately Identified or Evaluated - Preliminary site assessment failed to vertically define the extent of contamination beneath UST. Extent of Contamination Has Not Been Determined - isopropylbenzene, naphthalene, n-propylbenzene, 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were historically detected in groundwater, but the extent to which these compounds are currently present in soil and groundwater has not been assessed. Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - Human health/environmental risk assessment not conducted Sensitive Receptor Survey Has Not Been Completed - Sensitive Receptor Survey Has Not Been Completed

**INADEQUATE SOURCE CONTROL**

Feasible Source Control Not Performed - Remediation was conducted via AS/SVE; but remediation reports were limited to air district compliance and lack substantive data evaluation. The extent to which the system removed contaminant source(s) is unknown. Remaining Source Poses Threat to Groundwater - Groundwater already impacted above MCLs.

**PLUME INSTABILITY**

Verification Monitoring Not Complete - Confirmation assessment data questionable because several borings were advanced into excavation backfill, and because confirmation borings addressed only a portion of the area of known contamination.

**GROUNDWATER IMPACTS**

Groundwater Impacted Above Background - 1,2-dichloroethane exceeds MCL, benzene exceeds MCL, isopropylbenzene, naphthalene, n-propylbenzene, 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were historically detected in groundwater, but the extent to which these compounds are currently present in soil and groundwater has not been assessed. Groundwater Impacted Above Other Cleanup Goal - 1,2-dichloroethane exceeds MCL, benzene exceeds MCL, isopropylbenzene, naphthalene, n-propylbenzene, 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were historically detected in groundwater, but the extent to which these compounds are currently present in soil and groundwater has not been assessed.

**UNACCEPTABLE RISK**

Unacceptable Risks to Human Health from Soil - Construction worker direct exposure not evaluated, but possible on-site.

**PROCEDURAL IMPEDIMENTS**

Site Data And Reports Not Uploaded to Geotracker - Remediation data and reports not uploaded to Geotracker. Monitoring Wells Not Yet Abandoned - When no longer necessary for monitoring/remediation, proper destruction of monitoring wells and remediation piping would be required prior to closure. Local Agency Objects to Case Closure - LOP denied closure request in correspondence dated February 16, 2010.

**BENEFITS OF ADDITIONAL WORK**

Verify Remedial Action Effectiveness - Verify Remedial Action Effectiveness Remove / Reduce Source Mass - if remedial action was not effective Protect Designated Beneficial Uses - Protect Designated Beneficial Uses Protect Human Health - Protect Human Health

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

SENSITIVE RECEPTOR TIME; FRAME FOR IMPACT; COMMENTS: Groundwater Already; Impacted; 1,2-dichloroethane exceeds MCL, benzene exceeds MCL, isopropylbenzene, naphthalene, n-propylbenzene, 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were historically detected in groundwater, but the extent to which these compounds are currently present in soil and groundwater has not been assessed.

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**Review Conclusions T0608300525**

- Closure review dated 5/2010 indicates site assessment is incomplete and air sparge/vapor extraction conducted, but “reports were limited to air district compliance and lack substantive data evaluation. The extent to which the system removed contaminant source(s) is unknown.”

- Closure review also states that remediation data and reports not uploaded to GeoTracker. Closure request denied in correspondence dated 2/2010 and RP petitioned.

- Regional board responded to petition on 9/12/2010 and also does not support closure until 1,2-dichloroethane is delineated.

- **Discussion:** Next step – how to move this case toward closure? Aggressively enforce ESI compliance? Determine timeline and enforce deadlines? Site is pending petition for closure with SWRCB, closure may be granted as a ruling on the petition for closure.
JET GAS STATION (T0608300693)
5661 CALLE REAL, SANTA BARBARA, CA 93111

Case Age: 23 years
RP Identified by Regulator: ULTRAMAR INC.
Primary COC: GASOLINE
Current Land Use: Active service station

Possible Reasons Why This Case Is So Old
• Ongoing investigations, monitoring, and remedial actions since release. Free product still detected. Multiple phases work performed at site over the years.
• Corrective action required in 2009 not yet implemented.
• Offsite access issues

Activities Conducted to Date Based on GeoTracker Info
T0608300693

Assessment last 5 years
• Ongoing investigation and monitoring

Remediation last 5 years
• Ongoing bioventing system
• Additional DPE requested, but not yet implemented

Assessment older than 5 years
• Soil sampling after removal in 1987
• Ongoing investigations and monitoring, multiple phases

Remediation older than 5 years
• USTs removed in 1987 and station remodeled, replaced USTs in 1988
**IMPEDEMENTS TO CLOSURE** T0608300693

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 4/30/2010

**IMPEDEMENTS TO CLOSURE**

**SITE ASSESSMENT INCOMPLETE**
Incomplete Conceptual Site Model (CSM) - not completed Extent of Contamination Has Not Been Determined - free product found in MW-5 in 1q10 Sensitive Receptor Survey Has Not Been Completed - not completed

**INADEQUATE SOURCE CONTROL**
Feasible Source Control Not Performed - corrective action required in 2009 not implemented Remaining Source Poses Threat to Groundwater - free product found in MW-5 in 1q10

**PLUME INSTABILITY**
Significant Rebound In Concentrations After Remediation - free product found in MW-5 in 1q10

**GROUNDWATER IMPACTS**
Groundwater Impacted Above Background - TPHg, BTEX, Oxygenates Groundwater Impacted Above Other Cleanup Goal - TPHg, BTEX, Oxygenates

**UNACCEPTABLE RISK**
Unacceptable Risks to Human Health from Vapor Intrusion - free product found in MW-5 in 1q10

**PROCEDURAL IMPEDEMENTS**
Non-Responsive and / or Recalcitrant Responsible Party - RP has not implemented corrective action outline in 2009

**BENEFITS OF ADDITIONAL WORK**
Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - still needed Verify Remedial Action Effectiveness - need to implement corrective action Remove / Reduce Source Mass - free product in MW-5 Restore Beneficial Uses - potential beneficial uses

**SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**
SENSITIVE RECEPTOR TIME FRAME FOR IMPACT COMMENTS Groundwater Already Impacted free product, TPHg, BTEX, Oxygenates Other Already Impacted soil, TPHg, BTEX, Oxygenates

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**Review Conclusions** T0608300693

- Closure review dated 4/2010 indicates site assessment is incomplete and inadequate source control. Free product in one well and soil/groundwater impacted with TPHg, BTEX, and oxygenates.

- RP has not implemented corrective action requested in 2009.

- **Discussion:** Next step – how to move this case toward closure? Request site conceptual model to identify any data gaps and to support the decision making process for moving case along.
HWY 101/SALSIPEDES (T0608300647)
42 CALLE CESAR CHAVEZ N, SANTA BARBARA , CA 93103

Case Age: 23 years
RP Identified by Regulator: CALIFORNIA DEPARTMENT OF TRANSPORTATION
Primary COC: DIESEL, LEAD, WASTE OIL / MOTOR / HYDRAULIC / LUBRICATING
Current Land Use: Freeway and ditch

Possible Reasons Why This Case Is So Old
• In 1986, a waste oil and a redwood bunker fuel USTs were discovered prior to the construction of the Santa Barbara Crosstown freeway.
• Appears to have had little to no regulatory oversight or enforcement for 16 years after three monitoring wells were installed and sampled in 7/1988 until an additional assessment was requested in 2004.
• Delayed responses and activities from RP and past problems with non-compliance due to financial hardship.

Activities Conducted to Date Based on GeoTracker Info T0608300647

Assessment last 5 years
• Eight soil borings sampled in 9/2008
• Twenty soil and 5 grab samples in 4/2009

Assessment older than 5 years
• Soil sampling at time of first removal
• Three MWs installed in 7/1988; soil/GW samples collected (wells not located in subsequent investigation)
• Soil/GW assessment in 5/2004

Remediation last 5 years
• None documented

Remediation older than 5 years
• WO UST removed in 10/1987 and some over-excavation
• Redwood bunker fuel UST discovered, removed, and soil over-excavated 11/1987

NOTE: Data queried from GeoTracker and reviewed in September 2010
**IMPEDEMENTS TO CLOSURE T0608300647**

**as reported by regulatory agency**

**CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 4/9/2010**

**IMPEDEMENTS TO CLOSURE**

**SITE ASSESSMENT INCOMPLETE**
- Incomplete Conceptual Site Model (CSM) - due may 28, 2010
- Extent of Contamination Has Not Been Determined - workplan implementation by May 28, 2010
- Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - due May 28, 2010
- Sensitive Receptor Survey Has Not Been Completed - due may 28, 2010

**INADEQUATE SOURCE CONTROL**
- Feasible Source Control Not Performed - in site assessment phase
- Remaining Source Poses Threat to Groundwater - bunker fuel, diesel, naphthalene

**PLUME INSTABILITY**
- Groundwater Contamination Plume Not Stable or Decreasing - groundwater assessment not complete

**GROUNDWATER IMPACTS**
- Groundwater Impacted Above Background - bunker fuel, diesel, naphthalene

**PROCEDURAL IMPEDIMENTS**
- Non-Responsive and / or Recalcitrant Responsible Party - caltrans- constantly claims no budget for work, will ignore directives
- RP Says They Do Not Have Adequate Funds to Initiate or Continue Work at the Site - caltrans- constantly claims no budget for work

**BENEFITS OF ADDITIONAL WORK**
- Fill-in RI Data Gaps - fieldwork due by may 28, 2010
- Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - due by May 28, 2010
- Restore Beneficial Uses - potential beneficial uses

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

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<tbody>
<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>bunker fuel, diesel, naphthalene</td>
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</table>

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**Review Conclusions T0608300647**

- **Closure review dated 4/2010 indicates site assessment is incomplete and recalcitrant RP; Caltrans “claims no budget for work, will ignore directives.”**

- **Work plan was approved in 2/2009 and site conceptual model was requested, but delay in response from RP. Multiple notice to comply letters sent and work was completed in 4/2009.**

- **Multiple corrections and comments to site assessment report dated 5/2010 was requested by 9/30/2010. Also, limited ESI data in GT and site conceptual model has not been completed as requested by regulator.**

- **Highly elevated levels of bunker fuel and elevated levels of TPH as motor fuel and diesel also detected in soil and groundwater. TPH as bunker fuel was detected up to 8,100 mg/kg in soil. TPH as bunker fuel has been detected up to 160 mg/L and TPH as motor fuel and diesel have been detected above 1 mg/L in groundwater. Also, groundwater should be given as µg/L. Agency denied closure and requested further assessment to evaluate contaminant trends.**

- **Discussion: Next step – how to move this case toward closure? How to resolve funding issue for gov’t RP to avoid further delays in work? Aggressively enforce ESI compliance? Enforce site conceptual model requirement, identify all sensitive receptors, and data gaps to effectively evaluate risk, contaminant trends, and possible remedial actions (if needed).**

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HWY 101/SALSPUEDES (T0608300647)
42 CALLE CESAR CHAVEZ N, SANTA BARBARA, CA 93103

Case Age: 23 years
RP Identified by Regulator: CALIFORNIA DEPARTMENT OF TRANSPORTATION
Primary COC: DIESEL, LEAD, WASTE OIL / MOTOR / HYDRAULIC / LUBRICATING
Current Land Use: Freeway and ditch

Possible Reasons Why This Case Is So Old
• In 1986, a waste oil and a redwood bunker fuel USTs were discovered prior to the construction of the Santa Barbara Crosstown freeway.
• Appears to have had little to no regulatory oversight or enforcement for 16 years after three monitoring wells were installed and sampled in 7/1988 until an additional assessment was requested in 2004.
• Delayed responses and activities from RP and past problems with non-compliance due to financial hardship.

Activities Conducted to Date Based on GeoTracker Info
T0608300647

Assessment last 5 years
• Eight soil borings sampled in 9/2008
• Twenty soil and 5 grab samples in 4/2009

Assessment older than 5 years
• Soil sampling at time of first removal
• Three MWs installed in 7/1988; soil/GW samples collected (wells not located in subsequent investigation)
• Soil/GW assessment in 5/2004

Remediation last 5 years
• None documented

Remediation older than 5 years
• Waste oil UST removed in 10/1987 and some over-excavation
• Redwood bunker fuel UST discovered, removed, and soil over-excavated 11/1987

NOTE: Data queried from GeoTracker and reviewed in September 2010
IMPEDEMENTS TO CLOSURE T06083000647

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 4/9/2010

IMPEDEMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE
Incomplete Conceptual Site Model (CSM) - due may 28, 2010
Extent of Contamination Has Not Been Determined - workplan implementation by May 28, 2010
Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - due May 28, 2010
Sensitive Receptor Survey Has Not Been Completed - due may 28, 2010

INADEQUATE SOURCE CONTROL
Feasible Source Control Not Performed - in site assessment phase
Remaining Source Poses Threat to Groundwater - bunker fuel, diesel, naphthalene

PLUME INSTABILITY
Groundwater Contamination Plume Not Stable or Decreasing - groundwater assessment not complete

GROUNDWATER IMPACTS
Groundwater Impacted Above Background - bunker fuel, diesel, naphthalene

PROCEDURAL IMPEDIMENTS
Non-Responsive and / or Recalcitrant Responsible Party - caltrans- constantly claims no budget for work, will ignore directives
RP Says They Do Not Have Adequate Funds to Initiate or Continue Work at the Site - caltrans- constantly claims no budget for work

BENEFITS OF ADDITIONAL WORK
Fill-in RI Data Gaps - fieldwork due by may 28, 2010
Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - due by may 28, 2010
Restore Beneficial Uses - potential beneficial uses

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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</table>

Review Conclusions T06083000647

- Closure review dated 4/2010 indicates site assessment is incomplete and recalcitrant RP; Caltrans “claims no budget for work, will ignore directives.”
- Work plan was approved in 2/2009 and site conceptual model was requested, but delay in response from RP. Multiple notice to comply letters sent and work was completed in 4/2009.
- Multiple corrections and comments to site assessment report dated 5/2010 was requested by 9/30/2010. Also, limited ESI data in GT and site conceptual model has not been completed as requested by regulator.
- Highly elevated levels of bunker fuel and elevated levels of TPH as motor fuel and diesel also detected in soil and groundwater. TPH as bunker fuel was detected up to 8,100 mg/kg in soil. TPH as bunker fuel has been detected up to 160 mg/L and TPH as motor fuel and diesel have been detected above 1 mg/L in groundwater. Also, groundwater should be given as µg/L. Agency denied closure and requested further assessment to evaluate contaminant trends.
- **Discussion:** Next step – how to move this case toward closure? How to resolve funding issue for gov’t RP to avoid further delays in work? Aggressively enforce ESI compliance? Enforce site conceptual model requirement, identify all sensitive receptors, and data gaps to effectively evaluate risk, contaminant trends, and possible remedial actions (if needed).
MOBIL OIL SS#18-000 (T0608300085)
151 FAIRVIEW AVE S, SANTA BARBARA, CA 93117

Case Age: 21 years
RP Identified by Regulator: EXXONMOBIL OIL CORPORATION, PROPERTY OWNER (Individual)
Primary COC: GASOLINE, WASTE OIL / MOTOR / HYDRAULIC / LUBRICATING
Current Land Use: Vacant Lot, reportedly planned for redevelopment for commercial use

Possible Reasons Why This Case Is So Old
• Ongoing groundwater monitoring, but limited investigations during the first half of case history.
• Vapor extraction and pump and treat systems operated from 9/1991-3/1992, then 12,000 cubic tons of soil was excavated from 8/1992-2/1994. Verification monitoring detected elevated levels only along site boundaries.
• Appears limited effort to delineate off-site migration.

Activities Conducted to Date Based on GeoTracker Info T0608300085

Assessment last 5 years
• Ongoing groundwater monitoring since 1990
• Site assessment 11/2009

Assessment older than 5 years
• Eleven MWs installed
• Three wells abandoned as part of 1992-1994 excavation, verification sampling conducted.
• Soil sampling in 1999

Remediation last 5 years
• None documented

Remediation older than 5 years
• UST system removed and station abandoned in 1989
• Vapor extraction and pump/treat operated 9/1991-3/1992
• Excavation to 15 fbg from 8/1992-2/1994

NOTE: Data queried from GeoTracker and reviewed in September 2010
IMPEDEMENTS TO CLOSURE T0608300085

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 6/2/2010

IMPEDEMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE
Incomplete Conceptual Site Model (CSM) - CSM has not been prepared. Extent of Contamination Has Not Been Determined - Lateral extent of soil contamination is not defined east of the site. Downgradient extent of groundwater contamination is not defined. Sensitive Receptor Survey Has Not Been Completed - Sensitive receptor survey has not been completed.

INADEQUATE SOURCE CONTROL
Feasible Source Control Not Performed - Remedial action appears necessary to mitigate on-site impacts to soil and groundwater. Remaining Source Poses Threat to Groundwater - Ethylbenzene, TPH, MTBE, toluene, xylenes concentrations exceed background. Benzene, TBA concentrations exceed MCL.

PLUME INSTABILITY
Groundwater Contamination Plume Not Stable or Decreasing - Although the downgradient extent of groundwater contamination is not known, analytical results from existing monitoring points indicate offsite migration of dissolved-phase contaminants.

GROUNDWATER IMPACTS
Groundwater Impacted Above Background - Ethylbenzene, TPH, MTBE, toluene, xylenes concentrations exceed background. Groundwater Impacted Above Other Cleanup Goal - Benzene, TBA concentrations exceed MCL.

UNACCEPTABLE RISK
Unacceptable Risks to Human Health from Soil - On site, contamination has generally been remediated to the extent feasible. Little remediation has been attempted off site. Direct exposure risks may exist south of the site in the event of ground disturbance. Risks from exposure to contaminated soil have not been evaluated as part of a human health risk assessment. Unacceptable Risks to Human Health from Vapor Intrusion - On site, the results of human health vapor intrusion risk modeling indicate an incremental cancer risk of 5.781E-6, and a noncancer risk index of 1.251E-1. (The probability that an individual will develop cancer within his or her lifetime as the result of exposure to carcinogens present in soil vapor is 5.78 in 1,000,000. This risk exceeds the 1 in 1,000,000 acceptable risk for residential land use, but does not exceed the 1 in 100,000 acceptable risk for commercial land use.)

PROCEDURAL IMPEDIMENTS
Monitoring Wells Not Yet Abandoned - When no longer necessary for monitoring/remediation, proper destruction of wells would be required prior to closure.

BENEFITS OF ADDITIONAL WORK
Fill-in RI Data Gaps - Delineation of the downgradient extent of groundwater contamination will aid in determining the method and scope of remediation necessary. Remove / Reduce Source Mass - Remedial action appears necessary to mitigate offsite impacts to soil and groundwater. Protect Designated Beneficial Uses - Reduction in groundwater contaminant concentrations would protect designated beneficial uses. Protect Human Health - Reduction in the mass and volume of contaminants off site would mitigate potential direct-exposure and vapor intrusion risks.

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

<table>
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</tr>
</thead>
<tbody>
<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>Ethylbenzene, TPH, MTBE, toluene, xylenes concentrations exceed background. Benzene, TBA concentrations exceed MCL.</td>
</tr>
</tbody>
</table>

Review Conclusions T0608300085

• Closure review dated 6/2010 indicates site assessment is incomplete and inadequate source control. Remediation to extent feasible on-site, but little remediation attempted off-site. Off-site impacts to soil and groundwater not delineated.


• **Discussion:** Next step – how to move this case toward closure? Establish timeline, request site conceptual model to examine risk, delineate off-site migration, and determine further remedial actions?
SANTA BARBARA CITY SITE (T0608300218)
101 STATE ST, SANTA BARBARA, CA 93101

Case Age: 19 years
RP Identified by Regulator: CITY OF SANTA BARBARA, LA ARCADA INVESTMENT
Primary COC: DIESEL
Current Land Use: Not verified, appears to be a parking lot

Possible Reasons Why This Case Is So Old
• Limited regulatory oversight and enforcement.
• Elevated contamination levels in soil and groundwater detected in 1991, appears one enforcement letter sent in 1993 and next one sent in 5/2009 (according to GeoTracker).
• Gov’t RP, possible funding issues?
• Limited site history, no ESI submittals from RP.

NOTE: Data queried from GeoTracker and reviewed in September 2010

Activities Conducted to Date Based on GeoTracker Info
T0608300218

Assessment last 5 years
• Eight soil borings sampled in 9/2010
• 1/2010 well installation WP

Remediation last 5 years
• None documented

Assessment older than 5 years
• Investigation after removal activities in 1991, eight soil samples and one GW sample – highly elevated levels detected

Remediation older than 5 years
• UST removed 1991
**IMPEDEMENTS TO CLOSURE**

**T0608300218**

as reported by regulatory agency

**CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 4/27/2010**

**IMPEDEMENTS TO CLOSURE**

**SITE ASSESSMENT INCOMPLETE**

Incomplete Conceptual Site Model (CSM) - The results of preliminary site assessment conducted in March 2010 are pending. Pollutant Sources Have Not Been Adequately Identified or Evaluated - The results of preliminary site assessment conducted in March 2010 are pending. Extent of Contamination Has Not Been Determined - The results of preliminary site assessment conducted in March 2010 are pending. Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - The results of preliminary site assessment conducted in March 2010 are pending. Sensitive Receptor Survey Has Not Been Completed - The results of preliminary site assessment conducted in March 2010 are pending.

**GROUNDWATER IMPACTS**

Groundwater Impacted Above Background - Based upon the observation of free product at or below the capillary fringe during March 2010 assessment activities, groundwater is likely impacted above background. Groundwater Impacted Above Other Cleanup Goal - Based upon the observation of free product at or below the capillary fringe during March 2010 assessment activities, groundwater is likely impacted above MCLs.

**UNACCEPTABLE RISK**

Unacceptable Risks to Human Health from Soil - Potential risks to construction (including utility) workers have not been evaluated, but may warrant mitigative measures to protect human health. Unacceptable Risk from Contaminated Groundwater Day Lighting to Surface Water - The extent of groundwater contamination has not been evaluated, but based upon the shallow depth to groundwater and the proximity of Mission Creek, potential exists for groundwater contamination to migrate into surface water.

**PROCEDURAL IMPEDIMENTS**

Site Data And Reports Not Uploaded to Geotracker - Site has not been claimed on Geotracker. Consequently, no information has been uploaded.

**BENEFITS OF ADDITIONAL WORK**

Fill-in RI Data Gaps - The results of preliminary site assessment conducted in March 2010 are pending. Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - The results of preliminary site assessment conducted in March 2010 are pending. Restore Beneficial Uses - Groundwater impacts will be evaluated as site assessment data become available. Protect Human Health - Potential risks posed to construction workers will be evaluated based upon data from the March 2010 site assessment (pending). Protect Ecological Receptors - Impacts to Mission Creek will be evaluated as site assessment data become available.

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<tbody>
<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>Based upon the observation of free product at or below the capillary fringe during March 2010 assessment activities, groundwater is likely impacted above background.</td>
</tr>
<tr>
<td>Surface Water (Bay, Estuary, Stream, Lake)</td>
<td>Undetermined</td>
<td>Mission Creek is less than one block from site.</td>
</tr>
</tbody>
</table>

**Review Conclusions**

T0608300218

- Case claimed in GeoTracker ESI report, but no ESI submittals from RP.
- **Discussion:** Next step – how to move this case toward closure? How to resolve possible funding issue for gov’t RP to avoid further delays? Aggressively enforce ESI compliance? Establish timeline and request site conceptual model?
RAYNE WATER SERVICE (T0608300648)
5336 OVERPASS RD, SANTA BARBARA, CA 93111

Case Age: 17 years
RP Identified by Regulator: NANCO ENTERPRISES
Primary COC: GASOLINE
Current Land Use: Not verified

Possible Reasons Why This Case Is So Old
• Sporadic regulatory oversight and enforcement. Initial assessment ended after sampling in 1996 and then confirmation sampling in 1999 (report completed 4/2000).
• Regulator met with consultant and RP attorney in 6/2003 to discuss site and summarized items discussed in letter dated 5/2010.

Activities Conducted to Date Based on GeoTracker Info T0608300648

Assessment last 5 years
• WP received, approved on 9/23/2010. Site work to commence by 11/5/2010

Remediation last 5 years
• None documented

Assessment older than 5 years
• Soil sampling after removal in 1993
• Additional soil borings in 1994, 1995, 1996
• Verification soil sampling in 9/1999

Remediation older than 5 years
• UST removed in 3/1993
• Vapor extraction wells installed in 1994

NOTE: Data queried from GeoTracker and reviewed in September 2010
IMPEDEMENTS TO CLOSURE T0608300648

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 5/7/2010

IMPEDEMENTS TO CLOSURE
INADEQUATE SOURCE CONTROL
Feasible Source Control Not Performed - high levels of TPH and BTEX in soil

PROCEDURAL IMPEDEMENTS
Site Data And Reports Not Uploaded to GeoTracker - site not claimed in GeoTracker Monitoring Wells Not Yet Abandoned - may be one vapor well in existence at site Landowner Objects to Case Closure - Landowner did not want deed notice in 2000. Adjacent landowner wants their site cleaned up.

BENEFITS OF ADDITIONAL WORK Verify Remedial Action Effectiveness - No recent verification sampling Remove / Reduce Source Mass - TPH and BTEX soil Plume, no data since 1999

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<tbody>
<tr>
<td>Other</td>
<td>Already Impacted</td>
<td>Soil- TPHg, BTEX</td>
</tr>
</tbody>
</table>

Review Conclusions T0608300648

• Closure review dated 5/2010 indicates inadequate source control, no documentation of proper vapor extraction well abandonment, landowner objected to case closure (landowner did not want deed notice in 2000 and adjacent landowner wants their site cleaned.) No data since 1999, no recent verification sampling.

• Site is claimed according to ESI compliance report, but no ESI submittals from RP.


• Discussion: Next step – how to move this case toward closure? Aggressively enforce ESI compliance? Enforce timeline and request site conceptual model? Identify sensitive receptors and current risk?
Possible Reasons Why This Case Is So Old

- Free product still detected (now in MW-6, off-site well.)
- Many directive letters sent, but appears limited regulatory enforcement in past years.

Activities Conducted to Date Based on GeoTracker Info

**Assessment last 5 years**
- 23 MWs previously sampled quarterly, now semi-annual

**Remediation last 5 years**
- Air sparging/vapor extraction began 9/2000, additional wells installed 7/2007 and presently operating

**Assessment older than 5 years**
- Soil and GW samples after failed leak test
- Limited additional investigation and GW sampling activities conducted since 1993

**Remediation older than 5 years**
- USTs removed/replaced in 1986 and 1987
- Multi-phase extraction event 10/2000
IMPEDEMENTS TO CLOSURE T0608300587
as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 1/6/2010

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

INADEQUATE SOURCE CONTROL
Remaining Source Poses Threat to Groundwater - TPH BTEX, EDC, Oxys

GROUNDWATER IMPACTS
Groundwater Impacted Above Background - TPH BTEX, EDC, oxys free product noted in MW-06 in 2009

BENEFITS OF ADDITIONAL WORK
Remove / Reduce Source Mass - TPH BTEX, EDC, oxys Protect Designated Beneficial Uses - potential beneficial use

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<tr>
<td>Groundwater</td>
<td>Already Impacted</td>
<td>TPH BTEX, EDC, Oxys</td>
</tr>
</tbody>
</table>

Review Conclusions T0608300587

• Closure review dated 1/2010 indicates site assessment is incomplete (no sensitive receptor survey) and inadequate source control (free product detected in 2009, along with BTEX, EDC, and oxygenates).


• Hydrocarbon concentrations detected in equipment blanks during 12/2009 groundwater sampling event and consultant responded to 4/9/2010 letter from regulator in correspondence on 5/21/2010. Letter also reminded the consultant to comply to submittals deadlines.

• Discussion: Next step – how to move this case toward closure? Aggressively enforce ESI compliance requirements? Free product still detected. Request a site conceptual model again to assess risk, identify data gaps, and support the remedial decision making process.
ELLIS PROPERTY (T0608300247)
12 MONTECITO ST E, SANTA BARBARA, CA

Case Age: 16 years
RP Identified by Regulator: PROPERTY OWNER, Individual
Not Claimed in GeoTracker
Primary COC: GASOLINE
Current Land Use: Underdevelopment as a youth hostel

Possible Reasons Why This Case Is So Old
• Case closed and NFA issued for former Unocal service station portion of the property in 7/1994.
• Case reopened in 5/2009 because “naphthalene was detected at 4.1 mg/kg in soil sample collected from hand auger boring at the former location of fueling facilities and current property owner named responsible. RP petitioned to state board in 7/2009 and subsequent investigation concluded that a total of nine USTs were associated with this property.

Activities Conducted to Date Based on GeoTracker Info
T0608300247

Assessment last 5 years
• Site assessment work plan extension approved, expected 6/2010

Remediation last 5 years
• None documented

Assessment older than 5 years
• 1/1988 site assessment (former Unocal station)
• 6/1988 supplemental investigation
• 7/1994 additional assessment and request for closure, abandonment of MWs

Remediation older than 5 years
• 1988 four USTs removed from Unocal station and over-excavation
• Site remediation report dated 6/1994
Review Conclusions T0608300247

- Closure review dated 4/2010 indicates site assessment is incomplete and recalcitrant RP; “only initial assessment complete” to date, “site undergoing development”, and “RP has petition with state board”. Sensitive receptors indicated as municipal well and indoor air (time frame for impact undetermined) and groundwater (already impacted with naphthalene.)

- Former locations of USTs on properties and who the RPs are for fuel releases was brought into question by lawyer on behalf of current property owner (The Rodney James Shull Memorial Foundation) in letter dated 7/9/2009. In report dated 10/2009, consultants on behalf of the City of SB Redevelopment Agency concluded that releases existed on this property.

- Work plan extension for site assessment (naphthalene not fully assessed) was approved in 5/2010.

- **Discussion:** Next step – how to move this case toward closure? Aggressively enforce ESI compliance? Enforce timeline and request site conceptual model to identify any data gaps and current/future sensitive receptors (site in process of being redeveloped as youth hostel). Site appears to not be on track.
Case Age: 22 years
RP Identified by Regulator: UCSB
Not Claimed in GeoTracker
Primary COC: DIESEL
Current Land Use: Not verified

Possible Reasons Why This Case Is So Old
• The location of this former UST has been overbuilt by the expansion of the Marine Science building and appears that the previously impacted area was excavated for the new building foundation.
• No documents or ESI submittals.
• Appears no regulatory oversight or enforcement has occurred.
• Possible gov’t funding issues?

Activities Conducted to Date Based on GeoTracker Info

T0608300581

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 September 2010
**IMPEDEMENTS TO CLOSURE** T0608300581

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 6/30/2010

**BENEFITS OF ADDITIONAL WORK**
Other - FPD shall review data in the files and develop a case closure summary.

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

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<tr>
<td>Other</td>
<td>Undetermined</td>
<td>FPD will develop a case closure summary for this site and process it for closure by 9/30/2010.</td>
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</table>

**NOTES / COMMENTS**
The location of this former UST has been overbuilt by the expansion of the Marine Science building. There were minimal shallow impacts in the weathered Monterey or Sisquoc bedrock that daylighted a few dozen feet away. Perched water has been found in the area, but it is extremely limited and appears to be resultant from either rain or irrigation sources. The previously existing residual impacts appear to have been limited to bedrock. Based upon the new structure it appears that the previously impacted area was excavated for the new building foundation. FPD will develop a case closure summary for this site and process it for closure by 9/30/2010.

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**Review Conclusions** T0608300581

- Closure review dated 6/2010 indicates that the regulator needs to conduct a review of the file and “previously existing residual impacts appear to have been limited to bedrock. Based upon the new structure, it appears that previously impacted area was excavated for the new building foundation.”

- Regulator plans to develop a case closure summary by 9/30/2010.

- **Discussion:** Next step – how to move this case toward closure? Depends on what is found by the regulator in the case file. How to resolve any funding issue for gov’t RP? Enforce ESI compliance? Refer to Regional Board? Appears to be stuck.
UCSB BLDG 510, TANK 10 (T0608300145)
10 UCSB BLDG 510, SANTA BARBARA, CA 93106

Case Age: 22 years
RP Identified by Regulator: RP Contact not entered in GeoTracker
Not Claimed in GeoTracker
Primary COC: GASOLINE
Current Land Use: Not verified

Possible Reasons Why This Case Is So Old
• Notes indicate that the UST appears to have been in the area of the former vehicle maintenance building between Bldg 437 and 595. Agency believes documentation does exist, shall review file, and expected to complete a closure summary by 9/30/2010 if documentation is found.
• No apparent regulatory oversight or enforcement, file not reviewed and indicated as a historical LUSTIS cleanup action.
• UCSB site, possible funding issues?

Activities Conducted to Date Based on GeoTracker Info T0608300145

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 September 2010.
**Review Conclusions** T0608300145

- Closure review dated 6/2010 indicates “this UST appears to have been in the area of the former vehicle maintenance building” and the agency “shall review our files and if able to complete a case closure summary for this site by 9/30/2010.”

- No documentation, not ESI compliant, and historical LUSTIS case; possible government funding issue in the past and no action or regulator enforcement indicated in GeoTracker.

- **Discussion:** Next step – how to move this case toward closure? Enforce ESI compliance? Case review expected by 9/30. Case appears to be stuck.
TONY’S BODY AND FENDER (T0608375544)
18 COTA ST W, SANTA BARBARA, CA 93101

Case Age: 21 years
RP Identified by Regulator: PROPERTY OWNER
Not Claimed in GeoTracker
Primary COC: GASOLINE
Current Land Use: Auto body garage, appears to be in commercial, retail zone

Possible Reasons Why This Case Is So Old
• No documents or ESI data uploaded to GeoTracker.
• USTs removed under city sidewalk in 1989. Assessment completed by the city beneath the city sidewalk, but no action taken on the property due to recalcitrant RP.
• No regulatory oversight or enforcement for 16 years after removal of USTs beneath the sidewalk in 1989 until a groundwater and soil investigation was requested in 2005.
• Closed case on 3/17/2009 with same site name and Global ID No. T0608307642, but no enforcement in GeoTracker for an investigation on the property.

Activities Conducted to Date Based on GeoTracker Info
T0608375544

**Assessment last 5 years**
• None documented for delineating the contamination under the property
• Soil/GW investigation in 2006 for under sidewalk

**Remediation last 5 years**
• None documented

**Assessment older than 5 years**
• None documented for delineating contamination under the property

**Remediation older than 5 years**
• Two USTs removed in 1989 under sidewalk and over-excavated to ~10 fbg

NOTE: Data queried from GeoTracker and reviewed in September 2010
Review Conclusions T0608375544

- Closure review dated 5/2010 indicates site assessment is incomplete and calcitrant RP; “assessment and remediation has been completed by the city of Santa Barbara beneath the city sidewalk, but no action has been taken on the property itself due to the refusal of the responsible party to acknowledge the LUFT investigation or take any action.”

- After 500 gal waste oil and 500 gal gasoline USTs removed, the county designated site as low risk groundwater site. No activities after 16 years until 2005 assessment was requested.

- Appears only remediation was over-excavation to ~10 fbg after UST removal in 1989. Soil sample results reported generally low concentrations of BTEX and concentrations of TPHg from 1.5 mg/kg to 15 mg/kg.

- Closure report dated 8/10/2007 for other GeoTracker site indicates it was closed with all ND’s except lead at 21.5 mg/kg in soil and all grab groundwater concentrations were ND (no wells installed). GW flow direction reportedly to the south/southeast, in the direction of off-site, across the street.

- Discussion: Next step – how to move this case toward closure? Enforce ESI compliance? Identify sensitive receptors; GW was at 4 fbg, possible indoor air risk (excavation was directly adjacent to building)? In regards to reported GW flow direction, possible off-site contamination in the 16 years of no activity, but original soil concentrations were fairly low after over-excavation of soil. Not on track.
SANTA MARIA AIRPORT DIST ERA (T0608300552)
3217 SKYWAY DR, SANTA MARIA, CA 93455

Case Age: 21 years
RP Identified by Regulator: Contact information not entered in GeoTracker
Not Claimed in GeoTracker
Primary COC: WASTE OIL / MOTOR / HYDRAULIC / LUBRICATING
Current Land Use: Not verified

Possible Reasons Why This Case Is So Old
• Indicated as Historical LUSTIS Cleanup Action and not enough information in GeoTracker to make a determination.
• Possible Gov’t RP, possible funding issues?

NOTE: Data queried from GeoTracker and reviewed in September 2010

Activities Conducted to Date Based on GeoTracker Info
T0608300552

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
IMPEDEMENTS TO CLOSURE T0608300552

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 6/30/2010

IMPEDEMENTS TO CLOSURE
SITE ASSESSMENT INCOMPLETE
Incomplete Conceptual Site Model (CSM) - FPD shall complete a file review and determine if more work is warranted.

PROCEDURAL IMPEDEMENTS
Site Data And Reports Not Uploaded to Geotracker - FPD shall ensure that file is scanned and uploaded to GT
Other - FPD shall upload reports to GT and compile a case closure summary as part of its review.

BENEFITS OF ADDITIONAL WORK
Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - FPD shall review file and determine if more work is warranted.

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<td>Undetermined</td>
<td></td>
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</table>

This is a soil only case. FPD shall complete its file review and compile a case closure summary.

NOTES / COMMENTS FPD shall complete its file review and determine if enough data exists for a CSM to be completed. If so FPD shall compile a case closure summary if warranted.

Review Conclusions T0608300552

• Closure review dated 4/2010 indicates site assessment is incomplete and regulator plans to complete a file review, but did not provide a date when that will be completed. Also, indicated that this is a soil-only case.

• Notes indicate this case as a historical LUSTIS cleanup action.

• No additional information in GeoTracker to make a determination.

S.B. CITY FIRE STATION #1 - DIESEL (T0608344522)
121 CARRILLO ST W, SANTA BARBARA, CA 93101

Case Age: 21 years
RP Identified by Regulator: CITY OF SANTA BARBARA
Not Claimed in GeoTracker
Primary COC: DIESEL
Current Land Use: Exact location not verified, appears to be a commercial, retail zone

Possible Reasons Why This Case Is So Old
• Regulator uploaded correspondences, but limited site history and no submittals from the RP.
• Gov't RP, possible funding issues?
• Limited regulatory oversight or enforcement, many years between activities.

NOTE: Data queried from GeoTracker and reviewed in September 2010

Activities Conducted to Date Based on GeoTracker Info
T0608344522

Assessment last 5 years
• Soil/GW assessment sometime after work plan approved in 2000 until when it was described in 2006 report

Assessment older than 5 years
• Soil sampling at time of first removal
• One MW installed, possibly in 1997. Letter indicates MTBE was “sampled since 1997”

Remediation last 5 years
• None documented

Remediation older than 5 years
• GT indicates diesel UST release discovered 3/28/1989 from tank Closure and date stopped on 8/2/1989 by stop method indicated as “Close and Remove Tank”
IMPEDEMENTS TO CLOSURE 

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 4/30/2010

IMPEDEMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE
Extent of Contamination Has Not Been Determined - Results of verification assessment indicate that the extent of contamination is greater than previously known. Additional site assessment is necessary to delineate the lateral extent.

INADEQUATE SOURCE CONTROL
Remaining Source Poses Threat to Groundwater - Remaining source poses threat to groundwater, but the extent to which this site degrades groundwater is likely negligible when compared to the contaminant contributions of neighboring LUFT sites.

GROUNDWATER IMPACTS
Groundwater Impacted Above Background - MTBE, DPIE, PCE exceed background. None of these contaminants are believed to be related to the release at this site.
Groundwater Impacted Above Other Cleanup Goal - MTBE, PCE exceed MCL; DIPE exceeds taste/odor threshold. None of these contaminants are believed to be related to the release at this site.

BENEFITS OF ADDITIONAL WORK
Fill-in RI Data Gaps - Adequate delineation of impacts at this site will determine whether contamination from this site impacts neighboring properties.

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<td>Already Impacted</td>
<td>MTBE, PCE exceed MCL; DIPE exceeds taste/odor threshold. None of these contaminants are believed to be related to the release at this site.</td>
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</table>

Review Conclusions T0608344522

• In 3/2000 correspondence, the regulator indicated that the City needed to submit a work plan for replacement of the on-site monitoring well (submerged well screen) and assessment of diesel impacted soil. Well sampled for MTBE since 12/1997 and elevated levels detected, but believed it migrated from the nearby Santa Barbara Hand Car Wash.


• Closure review dated 4/2010 indicates site assessment is incomplete and results of verification assessment indicate extent of contamination is greater than previously known. Elevated levels of MTBE, DPIE, and PCE; none believed to be related to the release at the site.

• Discussion: Next step – how to move this case toward closure? How to resolve possible funding issue for gov’t RP to avoid delaying further assessment/remediation? Enforce ESI compliance? Consider referring to local DA or Regional Water Board for enforcement/oversight? Case appears to be stuck.
Case Age: 21 years
RP Identified by Regulator: CITY OF SANTA BARBARA, EARL HAYWARD FAMILY TRUST ESTATE OF ROLAND HAYWARD
Not Claimed in GeoTracker
Primary COC: GASOLINE
Current Land Use: Microbrewery, Telegraph Brewing Company

Possible Reasons Why This Case Is So Old
• Tank installed in city right-of-way in 1956, the city and tank operator (deceased, now family trust) were named as responsible parties.
• No site activities for 21 years since soil sampling after tank removal in 1989.
• Limited regulatory oversight and no apparent enforcement. Appears attempts made to contact RP, Mr. Hayward, were unsuccessful.

Activities Conducted to Date Based on GeoTracker Info T0608300216

Assessment last 5 years
• None documented

Assessment older than 5 years
• Soil sampling after removal contained up to 1,100 mg/kg TPHg in 1989.

Remediation last 5 years
• None documented

Remediation older than 5 years
• 550 gallon UST removed in 3/1989
Review Conclusions T0608300216

• Limited enforcement after elevated levels detected after UST removal in 3/1989 until regulator requested documentation of excavation and disposal of contaminated soil in 11/2002. RP (Mr. Hayward) stated that the site was "signed off by the State of California." Proof of this and requested documentation was required by 2/2003, but not submitted to the regulator and therefore, a site assessment work plan was requested.


• Closure review dated 4/2010 indicates no investigation since 1989 and no correspondence with RP since 2002. Levels in soil detected up to 1,100 mg/kg TPHg.

• Discussion: Next step – how to move this case toward closure? How to resolve possible funding issues for RP? What is the City’s involvement as an RP, no correspondence from them either? Enforce ESI compliance? Refer to the Regional Board? Groundwater is shallow, analyze risk and assess priority? Case appears to be stuck.
Case Age: 19 years
RP Identified by Regulator: CALTRANS
Not Claimed in GeoTracker
Primary COC: DIESEL
Current Land Use: Not verified, location for this address not found

Possible Reasons Why This Case Is So Old
• Historical LUSTIS Cleanup Action.
• No documents, limited site history.
• Closure review indicates that only one sample (date unknown) under piping had elevated concentrations and no further site assessment was conducted.
• Gov’t RP, possible funding issue.

NOTE: Data queried from GeoTracker and reviewed in September 2010

Activities Conducted to Date Based on GeoTracker Info
T0608300219

Assessment last 5 years
• None documented

Remediation last 5 years
• None documented

Assessment older than 5 years
• None documented

Remediation older than 5 years
• GT indicates date discovered 2/3/1992 by tank closure and stop method as “close and remove tank”
IMPEDEMENTS TO CLOSURE  T0608300219

as reported by regulatory agency

CLOSURE REVIEW - THIS CASE IS NOT READY FOR CLOSURE AS OF 6/25/2010

IMPEDEMENTS TO CLOSURE
SITE ASSESSMENT INCOMPLETE
Extent of Contamination Has Not Been Determined - Only one sample under piping had detection of TPH= 1900 Pb= 160 mg/kg. Benzene assumed at DL= 1.3 mg/kg - No further SA has occurred.
Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - Unknown since site assessment has not been performed.

BENEFITS OF ADDITIONAL WORK
Fill-in RI Data Gaps - Assessment could be 1 direct push boring under former dispenser island location to identify if there are still any concerns - recommend sampling at 3, 5, 7, 10 & 15 ft bgs. Analyze for TPH BTEX & Fuel oxygenates, recalcitrant compounds and Pb.
Verify Remedial Action Effectiveness - If sampled and found to be "clean:" then close site. Alternative assessment approach - use CalTrans backhoe to excavate to 3 ft collect a sample and then to 6 ft and collect a verification sample and analyze for TPH, BTEX, fuel oxygenates and recalcitrant compounds and Pb.

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

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<td>Undetermined</td>
<td>TPHg</td>
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</table>

NOTES / COMMENTS
This site has been considered a low risk site. Collecting one sample via a backhoe could utilize equipment onsite and then have then backfill and repave to minimize costs. - Alternative is close site as low risk as no residence will be placed here. This site is a likely candidate for low risk closure.

Review Conclusions  T0608300219

- Closure review dated 6/2010 indicates site assessment is incomplete and only one sample under piping was elevated (1,900 mg/kg TPHg and 160 mg/kg lead). Regulator recommended one direct push sample or to use CalTrans backhoe to excavate and sample.

- Note in closure review indicated that the site has been considered low-risk and a candidate for low-risk closure “as no residence will be placed there.”

- **Discussion:** Next step – how to move this case toward closure? How to resolve possible funding issue for gov’t RP (appears using on-site backhoe onsite is cost effective alternative suggested by regulator)? Aggressively enforce ESI compliance? Enforce timeline and cleanup goals? Site appears to be stuck at present.