NOTIFICATION OF OPPORTUNITY FOR PUBLIC COMMENT

UNDERGROUND STORAGE TANK (UST) CLEANUP FUND (FUND), MEETING NOTIFICATION FOR CASE CLOSURE RECOMMENDATION, PURSUANT TO HEALTH AND SAFETY CODE SECTION 25299.39.2: CLAIM NUMBER: 15879; SITE ADDRESS: 3264 RAMONA STREET, SACRAMENTO, CA 95826

By this letter, as Fund Manager, I am informing you of the Fund's intent to recommend closure of your UST site cleanup case to the State Water Resources Control Board (State Water Board) at its October 19, 2010, Board meeting.

In the interim, any reasonable, necessary, and eligible costs that you incur and submit in a properly documented reimbursement request will continue to be reimbursed by the Fund, as monies are available.

Meeting Notice

The State Water Board is planning to consider closing your UST case at its meeting that will be held on October 19, 2010, commencing at 9:00 a.m. in the Coastal Hearing Room, Second Floor of the Cal/EPA Building, 1001 I Street, Sacramento, California. Under separate cover at a later date, you will receive an agenda for this meeting.

Legal Authority

Health & Safety Code (H&SC) Section 25299.39.2(a) requires that the Fund Manager notify UST owners or operators who have a Letter of Commitment (LOC) that has been in active status for five or more years and to review the case history of these sites on an annual basis unless otherwise notified by the UST owner or operator. In addition, the H&SC section further states that the Fund Manager, with approval of the UST owner or operator, may recommend regulatory case closure to the State Water Board. This process is called the “5-Year Review.” The State Water Board may close or require the closure of a UST case that is under the jurisdiction of a Regional Water Quality Control Board (Regional Water Board) or a local agency participating in the State Water Board’s local oversight program.
Discussion

Having obtained your approval, and pursuant to H&SC Section 25299.39.2(a), to recommend closure of your UST case to the State Water Board, enclosed is a copy of the UST Case Closure Summary for your UST case. The case closure summary contains information about your UST case and forms the basis for the UST Cleanup Fund manager’s recommendation to the State Water Board for UST case closure. A copy of the Case Closure Summary is also being provided to your environmental consultant and the local agency that has been overseeing corrective action at your site. Other interested persons may obtain a copy of the Case Closure Summary by contacting Ms. Dennise Walker, at (916) 341-5789.

Comments

At the meeting, interested persons will be allowed to comment orally on the case closure recommendation (including the case closure summary), subject to the following time limits. The UST Cleanup Fund claimant and the local agency overseeing corrective action at the site will be allowed five minutes for oral comment, with additional time for questions by the State Water Board members. Other interested persons will be allotted a lesser amount of time to address the State Water Board. At the meeting, the State Water Board may grant UST case closure, deny case closure, or may continue consideration until a later meeting.

Written comments on the case closure summary must be received by the State Water Board by 12:00 p.m. on September 17, 2010. Please provide the following information in the subject line: October 19, 2010 Board Meeting, UST Case Closure, and applicable site address and UST Cleanup Fund claim number. Comments must be addressed to:

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
(tel) 916-341-5600
(fax) 916-341-5620
(email) commentletters@waterboards.ca.gov

If you have any questions regarding this matter, please contact Mr. Robert Trommer at (916) 341-5684.

Sincerely,

John Russell, P.G., Fund Manager
Underground Storage Tank Cleanup Fund

Enclosure
cc:  Thomas J. Knoch  
Apex Envirotech, Inc.  
11244 Pyrite Way  
Gold River, CA 95670

Val Siebal  
Sacramento County Environmental Management Department  
Environmental Compliance Division  
10590 Armstrong Avenue, Suite A  
Mather, CA 95655-4153

Barry Marcus  
Sacramento County Environmental Management Department  
Environmental Compliance Division  
10590 Armstrong Avenue, Suite A  
Mather, CA 95655-4153

Jack Bellan  
Sacramento County Environmental Management Department  
Environmental Compliance Division  
10590 Armstrong Avenue, Suite A  
Mather, CA 95655-4153

Brian Newman  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

City of Sacramento  
Department of Utilities  
1395 35th Avenue  
Sacramento, CA 95822

California State University  
6000 J Street  
Sacramento, CA 95819

City of Sacramento  
915 I Street, #5  
Sacramento, CA 95814

Bale Properties  
1681 Delta Court  
Hayward, CA 94544

Kelbro Corporation  
7675 Lakewood Road  
Sacramento, CA 95828
Geremia Pools, Inc.
Claim No. 15879

cc: C P Chy II

Marlo & John Brush
Current Resident
UST Case Closure Summary

This Underground Storage Tank (UST) Case Closure Summary has been prepared in support of a recommendation by the Petroleum Underground Storage Tank Cleanup Fund (Fund) to the State Water Resources Control Board (State Water Board) for closure of the UST case at 3264 Ramona Avenue in Sacramento, California (Site).

Agency Information

| Agency Name: Sacramento County Environmental Management Department (SCEMD) | Address: 10590 Armstrong Avenue, Suite A Mather, CA 95655 |

Case Information

| SCEHD Case No: F543 | Global ID: T0606701132 |
| Site Name: Geremia Pools | Site Address: 3264 Ramona Street, Sacramento, CA 95826 |
| Responsible Party: Geremia Pools, Inc. | Mailing Address: 1327 65th Street, Sacramento CA 95819 |
| USTCF Claim No.: 15879 | USTCF Expenditures to Date: $505,842 |
| Number of Years Open: 11 years |

Tank Information

<table>
<thead>
<tr>
<th>Tank No.</th>
<th>Size in Gallons</th>
<th>Contents</th>
<th>Closed in Place/Removed/Active?</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-1</td>
<td>5,000</td>
<td>Gasoline</td>
<td>Removed</td>
<td>Dec 98</td>
</tr>
<tr>
<td>T-2</td>
<td>10,000</td>
<td>Diesel</td>
<td>Removed</td>
<td>Dec 98</td>
</tr>
</tbody>
</table>

Release Information

- Source of Release: UST System
- Date of Release: December 11, 1998
- Affected Media: Soil and Groundwater

Site Information

- GW Basin: Sacramento Valley Basin
- Beneficial Uses: Municipal and Domestic Water Supply (MUN), Agricultural Supply (AGR), Industrial Service Supply (IND), and Industrial Process Supply (PRO)
- Land Use Designation: The Site is zoned commercial.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells within ½ mile of the Site.
- Minimum Groundwater Depth: The minimum reported depth to groundwater is 44.31 feet below ground surface (bgs) at monitoring well MW-9.
- Maximum Groundwater Depth: The maximum reported depth to groundwater is 50.97 feet bgs at monitoring well MW-4.
- Groundwater Flow Direction: The groundwater flow direction is south/southwest with an average gradient of 0.0077 feet per foot (ft/ft).
- Soil Types: The Site is underlain by interbedded and intermixed sand, silt and clay.

### Monitoring Well Information

<table>
<thead>
<tr>
<th>Well Designation</th>
<th>Date Installed</th>
<th>Screen Interval (feet bgs)</th>
<th>Most Recent Depth to Groundwater (feet bgs) (Oct 09)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MW-1</td>
<td>Sep 00</td>
<td>35-55</td>
<td>47.78</td>
</tr>
<tr>
<td>MW-2</td>
<td>Sep 00</td>
<td>35-55</td>
<td>47.72</td>
</tr>
<tr>
<td>MW-3A</td>
<td>Sep 00</td>
<td>35-55</td>
<td>47.80</td>
</tr>
<tr>
<td>MW-4</td>
<td>Dec 03</td>
<td>35-55</td>
<td>48.34</td>
</tr>
<tr>
<td>MW-5</td>
<td>Oct 01</td>
<td>35-55</td>
<td>47.57</td>
</tr>
<tr>
<td>MW-7</td>
<td>Oct 01</td>
<td>35-55</td>
<td>47.75</td>
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<tr>
<td>MW-8</td>
<td>Oct 01</td>
<td>35-55</td>
<td>48.25</td>
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<tr>
<td>MW-9</td>
<td>Dec 02</td>
<td>45-60</td>
<td>46.63</td>
</tr>
<tr>
<td>EW-9</td>
<td>Oct 01</td>
<td>10-55</td>
<td>48.07</td>
</tr>
<tr>
<td>MW-10</td>
<td>May 06</td>
<td>35-55</td>
<td>48.11</td>
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<tr>
<td>MW-11</td>
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</tr>
<tr>
<td>MW-12</td>
<td>May 06</td>
<td>35-55</td>
<td>46.92</td>
</tr>
<tr>
<td>GEW-13</td>
<td>May 06</td>
<td>41-61</td>
<td>47.86</td>
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</tbody>
</table>

### Petroleum Hydrocarbon Constituent Concentration

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Soil (mg/kg)</th>
<th>Water (ug/L)</th>
<th>WQOs (ug/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Maximum</td>
<td>Latest</td>
<td>Maximum</td>
</tr>
<tr>
<td>TPHg</td>
<td>16</td>
<td>16</td>
<td>24,000</td>
</tr>
<tr>
<td>TPHd</td>
<td>220</td>
<td>220</td>
<td>7,400</td>
</tr>
<tr>
<td>Benzene</td>
<td>150</td>
<td>150</td>
<td>9,800</td>
</tr>
<tr>
<td>Toluene</td>
<td>&lt;5</td>
<td>&lt;5</td>
<td>700</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>400</td>
<td>400</td>
<td>930</td>
</tr>
<tr>
<td>Xylenes</td>
<td>NA</td>
<td>NA</td>
<td>1,900</td>
</tr>
<tr>
<td>MTBE</td>
<td>NA</td>
<td>NA</td>
<td>&lt;5</td>
</tr>
<tr>
<td>TBA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>1,2-DCA</td>
<td>NA</td>
<td>NA</td>
<td>7</td>
</tr>
<tr>
<td>Lead</td>
<td>7.15</td>
<td>7.15</td>
<td>NA</td>
</tr>
</tbody>
</table>

NA = Not Analyzed, Not Applicable or Data Not Available
WQO = Water Quality Objectives
mg/kg = milligrams per kilogram, parts per million
ug/L = micrograms per liter, parts per billion

### Site Description

The Site is located on northwest corner of Ramona Avenue and Cucamonga Avenue in Sacramento, California. The Site is a construction yard used to store pool installation materials and equipment.
Site History/Assessments
In December 1998, petroleum hydrocarbons were detected in soil and groundwater during UST removal. Several investigations have been conducted since 2000, resulting in the installation of 15 monitoring wells and the subsequent abandonment of two wells. In addition, a sensitive receptor survey was conducted in 2001. Soil vapor extraction conducted from March 2004 through November 2008, removed 7,255 pounds of TPHg. A Site map showing the location of the former USTs, monitoring wells and the benzene concentrations in Site wells is provided at end of this case closure summary.

Remediation Summary
- Free Product: No free product was documented throughout the life of this case.
- Soil Excavation: Unknown volume
- In-Situ Soil Remediation:
  - Method: Soil Vapor Extraction
  - Duration: March 2004 through November 2008
  - Mass Removed: 7,255 pounds of TPHg
  - Rate of TPHg Removal: 0.79 pounds/day in November 2008
- Groundwater Remediation: None identified

General Site Conditions
- Geology and Hydrogeology: The Site is underlain by interbedded and intermixed sand, silt and clay. The depth to groundwater varies seasonally between 40 and 51 feet bgs. The groundwater gradient has varied from south to southwest, at approximately 0.0077 (ft/ft).
- Groundwater Trends: Benzene and TPHg concentrations in groundwater rapidly declined after soil vapor extraction began.

![Benzene Results for EW-9](image-url)
Time to Meet Water Quality Objectives: Estimated to be 5 to 10 years for benzene and TPHg. All other water quality objectives have been attained.

Sensitive Receptor Survey
A Sensitive Receptor Survey (SRS) was conducted by Apex in July 2001. A records search at the Department of Water Resources and an on-the-ground survey in the area identified no domestic or public water supply wells within 1,000 feet of the Site. (Apex; Workplan Addendum for Limited Subsurface Investigation and Sensitive Receptor Survey, 30 July 2001.) Water in the area is provided to water users by the City of Sacramento, Department of Utilities.

Risk Evaluation
Soil vapor extraction (SVE) removed a significant mass of residual hydrocarbons from the shallow subsurface and was terminated only after the rate of extraction significantly decreased. As a result of SVE, only small amounts of residual petroleum hydrocarbons remain in soil beneath the Site. The residual petroleum hydrocarbons do not pose a threat to groundwater resources, human health, or the environment. The contaminants of concern (TPHg and benzene) that remain above laboratory detection limits in the onsite monitoring wells were on a downward trend before SVE commenced and dropped rapidly during SVE. Water quality objectives are likely to be achieved through natural attenuation before shallow water resources will be utilized. In addition, residual soil contamination is not located beneath Site buildings and hydrocarbon vapors are unlikely to accumulate in the structures.

Closure
Will corrective action performed ensure the protection of human health, safety and the environment? Yes.

Is corrective action and UST case closure consistent with State Water Board Resolution 92-49? Yes.
Is achieving background water quality feasible? No.
To remove all traces of residual petroleum constituents at the Site would require significant
effort and cost. Removal of all traces of residual petroleum hydrocarbon constituents that
contribute to detectable concentrations in shallow groundwater can be accomplished, but would
require excavation of additional soil as well as additional remediation of shallow groundwater.
The soil excavation could also entail relocation of existing utilities, demolition of existing
buildings, temporary closure of existing businesses and road closures. If complete removal of
detectable traces of petroleum constituents becomes the standard for UST corrective actions,
the statewide technical and economic implications will be enormous. Because of the high costs
involved and minimal benefit of attaining further reductions in concentrations of TPHg and
benzene at this Site, and the fact that beneficial uses are not threatened, attaining background
water quality at this Site is not feasible.

If achieving background water quality is not feasible:

Is the alternative cleanup level consistent with the maximum benefit to the people of the
State? Yes.
It is impossible to determine the precise level of water quality that will be attained given the
limited residual petroleum hydrocarbons that remain at the Site. In light of all the factors
discussed above, and the fact that the residual petroleum constituents will not unreasonably
affect present and anticipated beneficial uses of groundwater, a level of water quality will be
attained that is consistent with the maximum benefit to the people of the state.

Will the alternative cleanup level unreasonably affect present and anticipated beneficial
uses of water? No.
Impacted groundwater is not used as a source of drinking water or for any other current
beneficial use. It is highly unlikely that the impacted groundwater will be used as a source of
drinking water or any other beneficial use in the foreseeable future.

Will the alternative level of water quality exceed water quality prescribed in applicable
Basin Plan? No.
The final step in determining whether cleanup to a level of water quality less stringent than
background is appropriate for this Site requires a determination that the alternative level of
water quality will not result in water quality less than that prescribed in the relevant basin plan.
Pursuant to State Water Board Resolution 92-49, the alternate level of water quality for this Site
will not exceed basin plan requirements.

Have factors contained in Title 23 of the California Code of Regulations, Section 2550.4
been considered? Yes.
In approving an alternative level of water quality less stringent than background, the State Water
Board has considered the factors contained in California Code of Regulations, title 23, section
2550.4, subdivision (d). As discussed earlier, the adverse effect on shallow groundwater will be
minimal and localized, and there will be no adverse effect on the groundwater contained in
deeper aquifers, given the physical and chemical characteristics of petroleum constituents, the
hydrogeological characteristics of the Site and surrounding land, and the quantity of the
groundwater and direction of the groundwater flow. In addition, the potential for adverse effects
on beneficial uses of groundwater is low, in light of the proximity of the groundwater supply
wells, the current and potential future uses of groundwater in the area, the existing quality of
groundwater, the potential for health risks caused by human exposure, the potential damage to
wildlife, crops, vegetation, and physical structures, and the persistence and permanence of
potential effects.
Finally, a level of water quality less stringent than background is unlikely to have any impact on surface water quality, in light of the volume and physical and chemical characteristics of petroleum constituents; the hydrogeological characteristics of the Site and surrounding land; the quantity and quality of groundwater and direction of groundwater flow, the patterns of precipitation in the region, and the proximity of residual petroleum to surface waters.

**Has the requisite level of water quality been met?** No.

Though the requisite water quality objectives have not yet been met, the approximate time period in which the requisite level of water quality will be met is 5 to 10 years. This is a reasonable period in which to meet the requisite level of water quality because the impacted groundwater is not currently being used as a source of drinking water and it is highly unlikely that impacted groundwater will be used as a source of drinking water during the period of impairment. Residential and commercial water users are currently connected to the municipal drinking water supply. Other designated beneficial uses of the impacted groundwater are not threatened and it is unlikely they will be. Considering these factors in the context of the Site setting and the concentrations of the residual petroleum constituents at the Site, Site conditions do not represent a threat to human health and safety and the environment and case closure is appropriate.

**Objections to Closure and Response**

The SCEMD objects to UST case closure because water quality objectives have not yet been achieved and it contends that there is not a declining trend for benzene and TPHg.

The Fund Manager disagrees that additional work is necessary at this Site. As a result of four years of SVE, there are minimal residual petroleum hydrocarbons in Site soils. Any residual petroleum hydrocarbons present in the groundwater will continue to attenuate. In addition, there are no domestic or public water supply wells within 1,000 feet of the Site and water in the area is provided to water users by the City of Sacramento, Department of Utilities.

The Fund is conducting public notification and the SCEMD has the regulatory responsibility to supervise the abandonment of monitoring wells.
Summary and Conclusion
In December 1998, petroleum hydrocarbons were detected in soil and groundwater during removal of two USTs. Several investigations have been conducted since 2000, resulting in the installation of 15 monitoring wells and the subsequent abandonment of two wells. In addition, a sensitive receptor survey was conducted in 2001 and soil vapor extraction from March 2004 through November 2008 has removed 7,255 pounds of TPHg. To date, the Fund has reimbursed $505,842 in corrective action costs.

The Water Quality Objectives for the residual petroleum constituents will likely be achieved in 5 to 10 years and before shallow water resources will be utilized. The nearest sensitive receptors are more than 1,000 feet from the Site. The impacted groundwater is not currently being used as a source of drinking water or other beneficial uses, and water in the area is provided to users by the Sacramento County Water District. It is highly unlikely that the impacted groundwater will be used as a source of drinking water or other beneficial use in the foreseeable future. Based on available information, the residual petroleum hydrocarbons at the Site do not pose significant risks to human health, safety, and the environment, and the Fund Manager recommends that the case be closed.

John Russell PG No. 8396
August 2, 2010
Date