

State Water Resources Control Board

Division of Financial Assistance 1001 I Street • Sacramento, California 95814 P.O. Box 944212 • Sacramento, California • 94244-2120 (800) 813-FUND (3863) • FAX (916) 341-5806• www.waterboards.ca.gov/water_issues/programs/ustcf/



Linda S. Adams Secretary for Environmental Protection Arnold Schwarzenegger Governor

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: 11469; SITE ADDRESS: WALNUT GROVE ELEMENTARY SCHOOL, 14181 GROVE STREET, WALNUT GROVE, CA 95690

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.

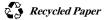
In the interim, any reasonable, necessary, and eligible costs that you incur and submit in a properly documented reimbursement request will continue to be reimbursed by the Fund, as monies are available.

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

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

Enclosure



cc: River Delta Unified School District 14193 Grove St. Walnut Grove, CA 95690

> Joseph D. Zilles BSK Associates 3140 Gold Camp Dr., Suite 160 Rancho Cordova, CA 95670

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

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

Sacramento County Water Agency Facilities, Operations & Administration 3847 Branch Center Road, Trailer #1 Sacramento, CA 95827

Sacramento County Water Agency Water Supply Office 3847 Branch Center Road, Trailer #5 Sacramento, CA 95827

County of Sacramento 10545 Armstrong Avenue, #201C Mather, CA 95655 -3-



Mercy Properties California 3120 Freeboard Drive West Sacramento, CA 95691

Walnut Grove Fire Protection District P.O. Box 41 Walnut Grove, CA 95690

Housing Authority of Sacramento P.O. Box 1834 Sacramento, CA 95812

L & L Investment Company P.O. Box 101 Walnut Grove, CA 95690

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Valentin Manzo Jr. P.O. Box 612 Walnut Grove, CA 95690

Walnut Grove Homeowners Association Merchants P.O. Box 844 Walnut Grove, CA 95690

Francisco J Jimenez, Gloria U Jimenez & Steve S Jimenez P.O. Box 534 Walnut Grove, CA 95690

Artemio T & Teresa B Gutierrez P.O. Box 687 Walnut Grove, CA 95690 -4-



cc: Teotima M Ramos P.O. Box 382 Walnut Grove, CA 95690

> Maximino C & Elena Manzo P.O. Box 1186 Walnut Grove, CA 95690

Graciela M Perez & Wendy J Montano P.O. Box 344 Courtland, CA 95615

Tiburcio & Eloisa Flores P.O. Box 685 Walnut Grove, CA 95690

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Jesus & Irene Rosa Maria Cano P.O. Box 328 Walnut Grove, CA 95690

Noe & Fidelina Jaimes P.O. Box 724 Walnut Grove, CA 95690

Michael Clyde Vest P.O. Box 1097 Walnut Grove, CA 95690

Martin D Bern

Flores & Eloisa Tiburcio

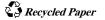
Jose & Rafaela Ledesma

Uribe Gabriela Jimenez

Zosima R & Miguel B Ramos

Elizabeth Lopez Manzo

Hugo & Linda Vargas



cc: Antonio Jaimes

Maria Magana & Manuel Jose Asuncion

Augustin V Boado

Jason Steve Medlock

Miroslav & Mila Hodzic

Hector Becerra

Current Residents



State Water Resources Control Board



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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 14181 Grove Street in Walnut Grove (Site).

Agency Information

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

Case Information

County Case No: C583	Global ID: T0606700651	
Site Name: Walnut Grove Elementary	Site Address: 14181 Grove St	
School	Walnut Grove, CA 95690	
Responsible Party: River Delta Unified	Mailing Address: 445 Montezuma St	
School District	Rio Vista, CA 94571	
USTCF Claim No.: 11469	USTCF Expenditures to Date: \$24,840	
	Number of Years Open: 23 years	

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active?	Date
1	2,000	heating oil or diesel*	Removed	2/87

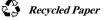
*Sacramento County correspondence dated March 11, 1998 referred to the removed tank as a diesel tank whereas the July 31, 1998, correspondence indicated that the tank contained heating oil. The March 17, 1987, Unauthorized Release Form listed diesel as the substance stored.

Release Information

- Source of Release: UST System
- Date of Release: March 17, 1987
- 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: Commercial and Residential
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are six active or inactive supply wells within ½ mile of the site. The closest supply well is an inactive backup well located 75 feet southeast of the site.
- Minimum Groundwater Depth: 2.99 feet below ground surface (bgs) at monitoring well MW-1
- Maximum Groundwater Depth: 5.78 feet bgs at monitoring well MW-2



- Groundwater Flow Direction: Because there is only one monitoring well at the site, there is insufficient information to determine groundwater flow direction.
- Soil Types: Soil underneath the Site consists of interbedded and intermixed sand, silt and clay.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Most Recent Depth to Groundwater (feet bgs) (1/15/2010)
MW-1	late 1987	?-8	3.88
MW-2	late 1987	*	*

*Well was properly abandoned on May 29, 2008.

Petroleum Hydrocarbon Constituent Concentration

Contaminant	Soil (mg/kg)		Water ug/L		WQOs
	Maximum	Latest	Maximum	Latest	(ug/L)
		5/29/2008		(1/15/2010)	
TPHg	1.6	1.6	4,800*	<50	5
TPHd	2,500	2,500	27,000*	87	56
Benzene	0.008	0.008	0.56	<5	0.15
Toluene	0.011	0.011	6.8	<5	42
Ethylbenzene	0.009	0.009	0.78*	<5	29
Xylenes	0.032	0.032	7.3*	<5	17
MTBE	<5-<25	<5-<25	<5	<5	5
				(4/30/2008)	
TBA	<50-<250	<50-<250	<5	NA	12
1,2-DCA	NA	NA	NA	NA	0.4
Lead	NA	NA	NA	NA	2
Napthalene	0.33	0.33	<5	<5	21

* Results from the grab groundwater sample collected from B-4 during the Geoprobe sampling event conducted in May 2001.

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

ug/L: micrograms per mer, pans per billion

Site Description

The Site is located on the southeast corner of Grove Street and Whyse Lane in Walnut Grove, California. The Site is currently an elementary school with residences located in surrounding areas north and west of the site. Agricultural land is located east and south of the school property.

Site History/Assessments:

One 2,000-gallon heating oil/ diesel UST was removed in February 1987. During tank removal, petroleum hydrocarbon contamination was found in soil and groundwater. According to reports and a SCEMD letter dated March 11, 1998, two groundwater monitoring wells (MW-1 and MW-2) were installed in late 1987. MW-2 became blocked with debris in 2002, and was subsequently destroyed in 2008. A total of nine soil borings were installed between 2001 and 2008, and soil and grab groundwater samples were collected. The results of the sampling found that petroleum contamination was limited to the immediate vicinity of the former UST.

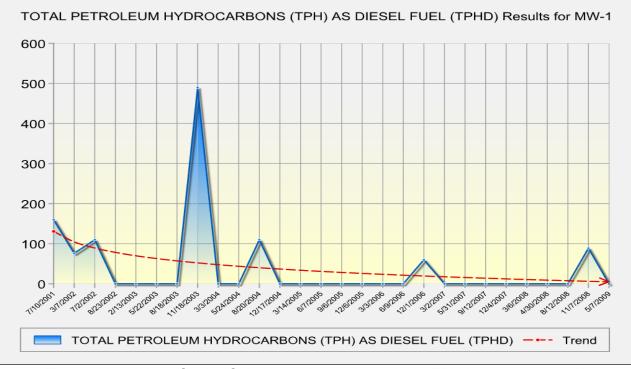


Remediation Summary

- Free Product Removal: No free product was documented throughout the life of this case.
- Soil Excavation: No documentation of soil excavation was found.
- In-Situ Soil Remediation: No in-situ soil remediation has been conducted at the site.
- Groundwater Remediation: No groundwater remediation has been conducted at the site.

General Site Conditions

- Geology and Hydrogeology: The Site is underlain by interbedded and intermixed gravel, sand, silt, and clay. The depth to groundwater varies seasonally between 3 and 5 feet bgs.
- Groundwater Trends: The concentrations of TPHd in groundwater show an overall decreasing trend as shown on the graph.



• Time to Meet Water Quality Objectives: It is estimated that TPHd concentration will take approximately five years to meet water quality objectives. All other water quality objectives have already been attained.

Sensitive Receptor Survey

According to data available in GeoTracker, there are six active or inactive supply wells within ¹/₂ mile of the Site. The closest supply well is located approximately 280 feet north of the Site. Water Well Driller's Reports obtained from the Department of Water Resources by the consultant for the Site indicated five domestic water wells within 1,000 feet of the Site. During a field reconnaissance conducted by the consultant in 2008, two of the five domestic wells appeared inactive or abandoned while another two could not be located. The location of the remaining well was visually verified by the consultant. This well is located approximately 850 feet northeast of the former UST location. This well is screened from 230 to 245 feet bgs.



Risk Evaluation

In April 2008, soil vapor samples were collected at 5 feet bgs from three different locations. Results were below the reporting limit or detected below the residential soil-gas screening levels established by the California Office of Environmental Health and Hazard Assessment for volatile chemicals beneath buildings constructed without a layer of engineered fill below the sub-slab gravel layer.

Although TPHd in shallow groundwater may occasionally exceed 56 ppb and thus violate the WQO, the residual concentration of TPHd in groundwater beneath the Site is unlikely to impact the aquifer downgradient from the source area because of the low mobility of this contaminant. Furthermore, the impacted groundwater is not currently being used as a source of drinking water or other beneficial uses. 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.

Closure

Has corrective action ensured 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 contributing 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 and road closures. If complete removal of detectable traces of petroleum constituents becomes the standard for UST corrective actions, however, 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 TPHd 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 any other beneficial use currently. 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, a Site may be closed if the basin plan requirements will be met within a reasonable time frame.

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 considers 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 level of water quality has not been met, the approximate time period in which the requisite level of water quality will be met is approximately five 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 in the foreseeable future. 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 highly unlikely that they will be. Considering these factors in the context of the Site setting, Site conditions do not represent a substantial threat to human health and safety and the environment and case closure is appropriate.

Objections to Closure and Response

In their response to the 5-year review recommendation for case closure, Sacramento County states that the remaining diesel impacted soil identified at eight to ten feet bgs threatens to degrade groundwater quality and must be removed before closure. On March 27, 2009, the County approved a work plan proposing to excavate petroleum hydrocarbon impacted soil at the location of the former UST. To date, the work plan has not been implemented.

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The Fund Manager disagrees that the residual diesel impacted soil poses significant threat to groundwater quality. Available groundwater level measurements between June 1998 and January 2010 showed that groundwater levels were between 3 and 6 feet bgs. These levels were consistently above eight to ten feet bgs where the highest petroleum hydrocarbon contamination in soil was detected. Except for TPHd, petroleum hydrocarbon constituents in groundwater were either below the Water Quality Objective (WQO) or below the reporting limit. During the twelve years of groundwater monitoring, the WQO for TPHd was only exceeded 8 times in monitoring well MW-1 which is located in the source area.

Although TPHd in shallow groundwater in contact with the limited residual petroleum hydrocarbons may occasionally exceed 56 ug/l and thus violates the WQO, the residual concentration does not pose significant risks to human health or the environment. The residual concentration of TPHd in groundwater beneath the Site is unlikely to impact groundwater downgradient from the source area because of its low mobility. Therefore, removal of the remaining petroleum hydrocarbon impacted soil is not necessary.

The California Department of Toxic Substances Control's Sacramento Schools Unit reviewed the Site data and does not object to case closure.

The Fund is conducting public notification and the SCEMD has the regulatory responsibility to supervise the abandonment of monitoring wells.

Summary and Conclusion

The Site is located on the southeast corner of Grove Street and Whyse Lane in Walnut Grove, California. The Walnut Grove Elementary School currently occupies the Site, with residences and agricultural land surrounding the area. The nearest water supply well is located 280 feet north of the Site. To date, \$24,840 in corrective action costs have been reimbursed. Although the localized residual TPHd in soil may cause the shallow groundwater to occasionally exceed the WQO, it is estimated that the WQO will be met in approximately five years. The shallow groundwater is not currently being used as a source of drinking water and it is unlikely that the shallow 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 public health, safety, and the environment, and the Fund Manager recommends that the case be closed.

John Russell

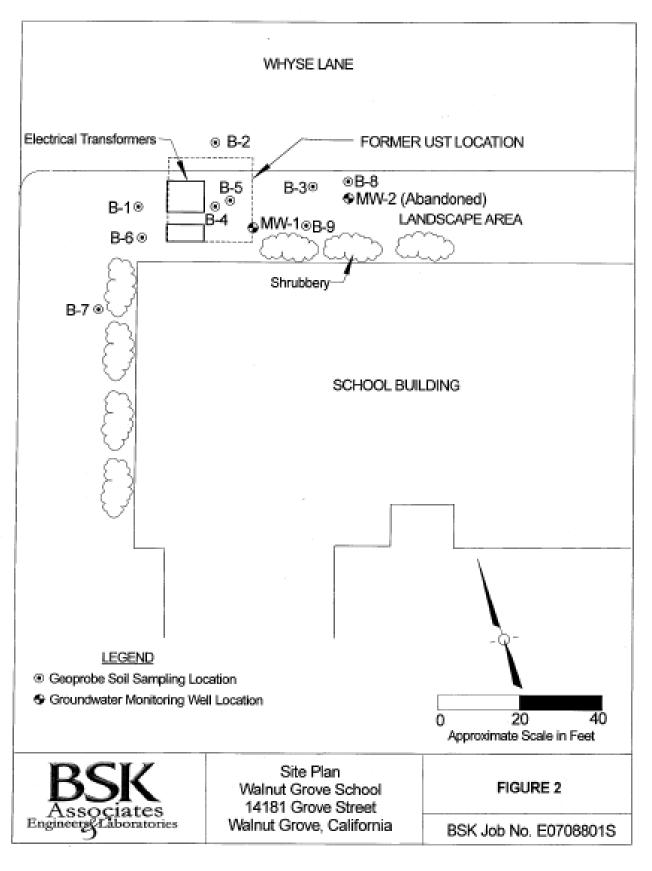
John Russell PG No. 8396

August 2, 2010

Date



Walnut Grove Elementary School Claim No. 11469



California Environmental Protection Agency

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