



October 11, 2013

Ms. Vivian Gomez-Latino  
  
State Water Resources Control Board  
1001 I Street, P.O. Box 2231  
Sacramento CA 95814

Mr. Ben Heningburg  
Division of Water Quality  
State Water Resources Control Board  
1001 I Street, P.O. Box 2231  
Sacramento CA 95814

**COMMENT LETTER – ARCO 6185 Proposed Case Closure**

Subject: Objection to Intent to Close Case  
5898 Mission Street, San Francisco,  
ARCO 6185, LOP 10056

Dear Mr. Heningburg:

The San Francisco Local Oversight Program (LOP) reviewed the file for 5898 Mission San Francisco, ARCO station 6185, and the most recent submittal by Arcadis on behalf of ARCO, Amended Request for Low-Threat Closure, dated August 23, 2013. DPH LOP objects to the closure of the case based on the Low Threat Closure Policy Checklist reviews by both the State Water Resources Control Board (SWRCB) and the DPH LOP which conclude that the site does not meet the criteria of the Low Threat Closure Policy adopted as SWRCB Resolution 2012-0016, effective August 17, 2012 (LTCP). The case LTCP Checklist validation completed by SWRCB contractor also concluded that the site is not eligible for closure and that the project is not progressing based on a lack of responsiveness by Arcadis/ARCO to repeated specific requests from the LOP.

Summary of Data to April 2013

Groundwater monitoring results indicate that dissolved petroleum hydrocarbons continue to be found in monitoring wells A-1R, A-2R and S-15. Dissolved petroleum hydrocarbons were additionally measured in wells A-3 and A-4 this quarter. Total Petroleum Hydrocarbons as gasoline (GRO) concentrations ranged from 62 micrograms per liter (ug/L) (S-15) to 7100 ug/L in A-1R; an increase over the previous maximum of 3500 ug/L in A-1R.

Benzene ranged from below detection limits (ND) (A-3, A-4) to 2600 ug/L (A-1R). Well S-16 contained 1700 ug/L benzene. The maximum benzene concentrations increased over the previous maximum benzene value of 792 ug/L (A1-R).

Methyl tert butyl ether (MTBE) concentrations ranged from ND as <1.0 ug/L in most wells, except the ND as <25 ug/L in well A1-R, which contained 7100 ug/L GRO. The highest reported MTBE concentration was 8 ug/L a decrease from the previous maximum of 11.6 ug/L (A-2R).

Summary of Data from June 2013

An additional subsurface investigation was performed in June 2013 in an effort to further evaluate petroleum hydrocarbon impacts in groundwater at the site. The objectives were to collect additional data to evaluate the extent of contamination in a shallow groundwater zone (15-23 feet below ground

surface (ft bgs)), and “further substantiate/confirm the conceptual site model . . . in support of closure by providing additional data for the deeper water bearing zone (approximately 40 feet bgs). Four borings were installed and sampled; two to 25 ft bgs and two to 40 ft bgs. Shallow and deep borings were co-located at the northeast of the site, in the downgradient direction, and by the former pump island closer to Sickles Avenue. The shallow borings were dry, the shallow water zoned observed by Mission Street was not observed in these more westerly locations. Soil samples were collected from the deeper borings at 2 or 5 and 10 ft bgs only. Soil samples were not collected from the co-located shallow borings.

Analyses of the June 2013 samples showed low levels of contamination in shallow soils and elevated concentrations in one groundwater location. The deep boring near the former pump island (HP-2) has the maximum groundwater concentration found on the site this year at GRO 110,000 ug/L and benzene 19,000 ug/L.

#### Discussion

DPH LOP opposes the closure of the LOP case for the ARCO 6185 site, 5898 Mission Street. San Francisco. The site does not meet the groundwater specific criteria of the LTCP per the analysis of the LOP and the SWRCB. The general criteria have not been met in that an additional secondary source may have been identified and the plume has not been defined towards Sickles Avenue. The secondary source identified in June 2013 in the HP-2 area appears to be located along Sickles Avenue with elevated concentrations in Wells A1-R (GRO 7100 ug/L, benzene 2600 ug/L) and well S-16 (GRO 2700 ug/L, benzene 1700 ug/L). Data for the April 2013 shows that benzene concentration in some wells is increasing.

The Shell Station across Mission Street at 5897 Mission, contains free product on the groundwater and is being assessed under the LOP program. It is possible that some of the measured contamination on 5898 Mission may originate at 5897 Mission. However, the high groundwater concentrations around HP-2 suggest an onsite source is also contributing to the observed concentrations.

DPH LOP respectfully requests that the case not be closed at this time and that SWRCB support additional investigation in Sickles Avenue to define the plume. DPH LOP again requests that the consultant/RP re-assess the previous remediation system design in light of the new subsurface information. Alternative methods of remediation may be proposed.

Should you have any questions, please contact me at (415) 252-3885 or by email at [elyse.heilshorn@sfdph.org](mailto:elyse.heilshorn@sfdph.org).

Thank you for your consideration in this matter.

Sincerely,



Elyse D. Heilshorn, PE, REA  
Senior Environmental Health Inspector

cc: Megan Smoley, David Evans Arcadis  
Cheryl Prowell, RWQCB Oakland