

State Water Resources Control Board

UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: North Coast Regional Water Quality Control Board (Regional Water Board)	Address: 5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403
Agency Caseworker: Kasey Ashley	Case No.: 1TMC054

Case Information

USTCF Claim No.: 445	Global ID: T0604500046
Site Name: Former Food & Liquor No. 166	Site Address: 180 North Main Street, Willits, CA 95490 (Site)
Petitioner: Tower Energy Group Attention: Mark Vasey	Address: 1983 West 190 th Street Torrance, CA 90504
USTCF Expenditures to Date: \$342,561	Number of Years Case Open: 23

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0604500046

Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This Site meets all of the required criteria of the Policy. A summary evaluation of compliance with the Policy is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Site Information**. Highlights of the Conceptual Site Model of the Site follow:

The release at this Site was discovered when the underground storage tanks (USTs) were removed and replaced in 1989. During the USTs removal, approximately 100 cubic yards (cy) of impacted soil were excavated. There is currently an active fueling facility on Site.

Based on the historical groundwater data, groundwater concentration trends for total petroleum hydrocarbons as gasoline (TPHg), benzene, methyl tert-butyl ether (MTBE), and tert-butyl alcohol (TBA) have been either stable or decreasing in all groundwater monitoring wells. Petroleum constituents have been monitored in Mill Creek since 2003. Historical data indicate that MTBE was only detected two times in Mill Creek. These detections were below the water quality objective (WQO). TBA was detected once at 16 µg/L in the creek. Petroleum constituents have not been detected in Mill Creek since 2004.

The petroleum release is limited to the shallow soil and groundwater. The affected groundwater is not currently being used as a source of drinking water or any other designated beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or any other

beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals. Production intervals are in deeper protected aquifers. Remaining petroleum constituents are limited, stable, and declining. Remedial actions have been implemented and further remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the conceptual model. Remaining petroleum constituents do not pose significant risk to human health, safety, or the environment.

Rationale for Closure under the Policy

- General Criteria – Site meets all eight general criteria under the Policy.
- Groundwater – Site meets Policy Groundwater-Specific Class “5”. Based on an analysis of site-specific conditions, under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health, safety, and the environment and WQOs will be achieved within a reasonable time frame.

Site conditions only pose a low threat to groundwater and Mill Creek because:

- The plume is stable.
 - Natural attenuation appears to be established as evidenced by stable or decreasing groundwater concentration trends for TPHg, benzene, MTBE, and TBA in all groundwater monitoring wells and MTBE and TBA have not been detected in Mill Creek since 2004.
 - USEPA National Recommended Water Quality criteria for the protection of freshwater aquatic life for MTBE are 51,000 µg/L (4-day average) and 151,000 µg/L (one-hour average). USEPA National Recommended Water Quality criteria for the protection of freshwater aquatic life for TBA have not been established. The most current groundwater sampling event in August 2012 indicated that MTBE was detected at 8.7 µg/L in well MW-4, which is significantly lower than the criteria for the protection of freshwater aquatic life. Therefore, even in the worst case that MTBE plume could migrate to Mill Creek, it is highly unlikely that the residual MTBE would impair the beneficial uses of the creek.
- Petroleum Vapor Intrusion to Indoor Air – Site meets the exception for vapor intrusion to indoor air. The Site is an active petroleum fueling facility and has no release characteristics that can be reasonably believed to pose an unacceptable health risk.
 - Direct Contact and Outdoor Air Exposure – Site meets the Policy Class “a”. Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 of the Policy. The estimated naphthalene concentrations in soil meet the thresholds in Table 1 for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Objections to Closure

Regional Water Board staff objected to UST case closure because:

1. The groundwater plume is not fully defined to the south of well MW-4.

Response: Dissolved concentrations of benzene and MTBE are at or near the WQOs. The concentration trend for TPHg in the groundwater has been decreasing in well MW-4. Historical data indicate that MTBE was only detected two times in Mill Creek. These detections were below