

State Water Resources Control Board

UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board	Address: 320 West 4th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Noman Chowdhury	Case No.: R-20497

Case Information

USTCF Claim No.: 15629	Global ID: T0603705309
Site Name: Burgess Transportation	Site Address: 20825 Currier Rd Walnut, CA 91789 (Site)
Petitioner: Lee Nelson	Address: Po Box 10067 Fullerton, CA 92838
USTCF Expenditures to Date: \$720,320	Number of Years Case Open: 18

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603705309

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 case follow:

The unauthorized release was discovered following the removal of four Underground Storage Tanks (USTs) in August of 1994. No known USTs remain at the site. Three remedial pilot studies were conducted and a full scale High Vacuum Dual Phase Extraction (HVDPE) was selected and implemented. Results of the HVDPE indicated that extraction technologies were ineffective due to lithology with low permeability resulting in limited contaminant and groundwater mobility in the subsurface. The soil and groundwater plumes are located within the Site boundaries and are well defined horizontally and vertically by samples identified below detection limits. Soil and groundwater analytical data demonstrate that residual contamination is stable and remains in a very localized area within 100 feet of the release.

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 for any other designated beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or for any other beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals and screens that are in deeper more protected aquifers. Remaining petroleum constituents are limited, stable and declining. Remedial actions have been implemented and further

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remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the conceptual model. Any 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 Media-Specific Criteria. Site meets the criterion in **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 and safety and to the environment and water quality objectives (WQOs) will be achieved within a reasonable period of time.
- Petroleum vapor Intrusion to Indoor Air –Site meets **CRITERIA (2) a. SCENARIO 4**. Site-specific conditions satisfy Scenario 4. Direct soil gas measurements oxygen data were collected and are less than or equal to those listed in the Scenario 4 Table.
- Direct Contact and Outdoor Air Exposure – Site meets **CRITERIA (3) a**. Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1. The estimated naphthalene concentrations in soil meet the thresholds in Table1 and the policy criteria 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

Los Angeles Regional Water Quality Control Board (Regional Water Board) staff objected to UST case closure because:

1. 0.29 feet of free product was observed on January 14, 2011.
RESPONSE: Free product has been observed five times in eleven years and only twice has the thickness of the free product been identified greater than a sheen. Given that geology at the site is not conducive to extraction technologies, and the intermittent nature of the free product observances, further free product removal would not be practical.
2. Dissolved hydrocarbon concentrations in three of the groundwater monitoring wells have shown increasing trends.
RESPONSE: Recently, dissolved petroleum hydrocarbons increased in the source area wells. The increase was likely a result of remobilization of petroleum hydrocarbons trapped in soil driven by the unusually high precipitation and the associated increased groundwater table observed during the winter of 2009/2010. Therefore, excluding the recent increase, dissolved hydrocarbon trends observed in source area wells appear to be stable/decreasing. The wells on the outer edge of the plume (non-detect ring) were unaffected by the recent increase indicating the plume laterally stable.
3. The dissolved hydrocarbon fluctuations are too large to identify a stable/decreasing trend.
RESPONSE: The release was identified 18 years ago and the plume is ringed by non-detect monitoring wells therefore, the historic data for the outer wells indicates that the contaminant mass has expanded to its maximum extent where attenuation exceeds migration and is laterally stable. Given that the plume has been laterally stable, the very localized concentration fluctuations do not threaten human health and do not warrant further concern.