

State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Alameda County Environmental Health (County)	Address: 1131 Harbor Bay Parkway, Alameda, CA 94502-6577
Agency Caseworker: Keith Nowell	Case No.: RO0000514

Case Information

USTCF Claim No: 2343	Global ID: T0600101039
Site Name: Pacific Supply	Site Address: 1735 24 th Street, Oakland, CA 94604
Responsible Party (RP): PCBP Properties, Inc.	Address: 1735 24 th Street, Oakland, CA 94604
USTCF Expenditures to Date: \$554,536	Number of Years Case Open: 24

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600101039

Summary

The Low-Threat Underground Storage Tank (UST) 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 case 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 Case Information (Conceptual Site Model)**. Highlights of the case follow:

An unauthorized leak was reported in January 1988 following the removal of one UST. Soil vapor extraction was conducted between December 1993 and June 1996, which removed 6,550 pounds of total petroleum hydrocarbons as gasoline (TPHg). Approximately 151,089 gallons of contaminated groundwater were removed from the subsurface. According to groundwater data, water quality objectives have been achieved or have nearly been achieved for all constituents except for benzene.

The petroleum release is limited to the shallow soil and groundwater. No public supply wells regulated by the California Department of Public Health or surface water bodies are located within 1,000 feet of projected plume boundary. No other water supply wells were identified within 1,000 feet of the projected plume boundary in files reviewed. Water is provided to water users near the Site by the East Bay Municipal Utilities Department. The affected groundwater is not currently being used as a source of drinking water and it is highly unlikely that the affected groundwater will be used as a source of drinking water or in the foreseeable future. Other designated beneficial uses of impacted groundwater are not threatened and it is highly unlikely that they will be considering these factors in the context of the site setting. Remaining petroleum hydrocarbon constituents are limited, stable and concentrations declining.

Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

- **General Criteria:** The case meets all eight Policy general criteria.
- **Groundwater:** The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 µg/L and the dissolved concentration of methyl tert-butyl ether (MTBE) is less than 1,000 µg/L. The strong downward trend in downgradient well MW-2 suggest this plume is degrading.
- **Vapor Intrusion to Indoor Air:** The case meets Policy Criterion 2a by Scenario 3a. The maximum benzene groundwater concentration is less than 100 µg/L. The minimum depth to groundwater is greater than 5 feet, which is overlain by soil containing less than 100 mg/kg of TPHg. There are no structures above either the groundwater plume or residual soil contamination.
- **Direct Contact and Outdoor Air Exposure:** The case meets Policy Criterion 3b. A professional assessment of site-specific risk from exposure shows exposure shows that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health. The Site is paved preventing direct exposure. Confirmation soil samples collected in 2004 between 6.5 and 8 feet below ground surface (bgs) were below Policy Table 1 commercial/industrial thresholds. Soil vapor extraction was conducted for 2.5 years and was discontinued when extraction rates dropped precipitously, evidence all significant shallow residual hydrocarbons have been removed.

Objections to Closure and Responses

The County objects to UST case closure because:

- The extent of contamination has not been adequately defined.
RESPONSE: Further investigation is unlikely to alter the current conceptual site model.
- Indoor vapor migration threat must be assessed.
RESPONSE: The case meets Policy Criterion 2a by Scenario 3a. The maximum benzene groundwater concentration is less than 100 µg/L. The minimum depth to groundwater is greater than 5 feet. No site structures exist where vapors could concentrate or threaten public health.
- Active remediation is necessary to control plume migration.
RESPONSE: No active remediation has been required by Alameda County since 1996. Groundwater trends suggest water quality objectives will be achieved without further remediation. This case meets the Policy, including the requirement that the plume must be stable or decreasing in areal extent. The Policy does not require that requisite level of water quality be met at the time of case closure; it specifies compliance with cleanup goals and objectives within a reasonable time frame.

Recommendation for Closure

Based on available information, residual petroleum hydrocarbons at the Site do not pose a significant risk to human health, safety, or the environment, and the case meets the requirements of the Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board is conducting public notification as required by the Policy. Alameda County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock

Lisa Babcock, P.G. 3939, C.E.G. 1235

3/29/13

Date

PREPARED BY: Kirk Larson, P.G.

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The case complies with the State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the site do not pose significant risk to human health, safety, or the environment.

The case complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<p>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST site closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If so, was the corrective action performed consistent with any order?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p><u>General Criteria</u> General criteria that must be satisfied by all candidate sites:</p> <p>Is the unauthorized release located within the service area of a public water system?</p> <p>Does the unauthorized release consist only of petroleum?</p> <p>Has the unauthorized (“primary”) release from the UST system been stopped?</p> <p>Has free product been removed to the maximum extent practicable?</p> <p>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

<p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Nuisance as defined by Water Code section 13050 does not exist at the site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Media-Specific Criteria Candidate sites must satisfy all three of these media-specific criteria:</p> <p>1. Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p> <p>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>2. Petroleum Vapor Intrusion to Indoor Air: The case is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p>Is the site an active commercial petroleum fueling facility? Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>

<p>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>3. Direct Contact and Outdoor Air Exposure: The case is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p> <p>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?</p> <p>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

ATTACHMENT 2: SUMMARY OF BASIC CASE INFORMATION (Conceptual Site Model)

Site Location/History

- This Site is located at 1735 24th Street in Oakland and is a paved parking lot.
- The Site is bound by 24th Street to the northeast, a warehouse to the northwest and southwest and Willow Street to the southeast.
- A Site map showing the location of the former USTs, monitoring wells, and site features is provided at the end of this closure review summary.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: January 1988.
- Status of Release: UST removed.
- Free Product: None reported.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	1,000	Gasoline	Removed	May 87

Receptors

- GW Basin: Santa Clara Valley – East Bay Plain.
- Beneficial Uses: Municipal and Domestic Supply.
- Land Use Designation: Aerial photograph available on GeoTracker suggests commercial land use in the vicinity of the Site.
- Public Water System: East Bay Municipal Utilities District.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by California Department of Public Health or other supply wells within 1,000 feet of the projected plume boundary. No other water supply wells were identified within 1,000 feet of the projected plume boundary in files reviewed.
- Distance to Nearest Surface Water: There is no identified surface water within 1,000 feet of the projected plume boundary.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by interbedded and intermixed gravel, sand, silt and clay.
- Maximum Sample Depth: 10 feet bgs.
- Minimum Groundwater Depth: 5.83 feet bgs at monitoring well VRW-2.
- Maximum Groundwater Depth: 8.01 feet bgs at monitoring well VRW-9.
- Current Average Depth to Groundwater: Approximately 8 feet bgs.
- Saturated Zones(s) Studied: Approximately 6 - 20 feet bgs.
- Groundwater Flow Direction: North northwest with an average gradient of 0.004 feet/foot (January 2012).

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (07/16/12)
MW-1	Oct 88	10-20	7.52
MW-2	Oct 88	10-20	7.05
MW-3	Oct 88	10-20	7.71
VRW-1	Aug 93	4-19	7.40
VRW-2	Aug 93	4-19	7.00
VRW-3	Aug 93	4-19	7.60
VRW-4	Aug 93	4-19	7.17
VRW-5	Aug 93	4-19	-
VRW-6	Aug 93	4-19	7.35
VRW-7	Aug 93	4-19	7.57
VRW-8	Aug 93	4-19	7.56
VRW-9	Aug 93	4-19	-

Remediation Summary

- Free Product: Free product has not been documented in GeoTracker.
- Soil Excavation: Unknown.
- In-Situ Soil/Groundwater Remediation: Soil vapor extraction was conducted between December 1993 and June 1996, which removed 6,550 pounds of TPHg. Approximately 151,089 gallons of contaminated groundwater were removed.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs* [mg/kg and (Date)]	Maximum 5-10 feet bgs [mg/kg and (Date)]
Benzene	NA	<2.5 (07/21/04)
Ethylbenzene	NA	25 (07/21/04)
Naphthalene	NA	NA
PAHs	NA	NA

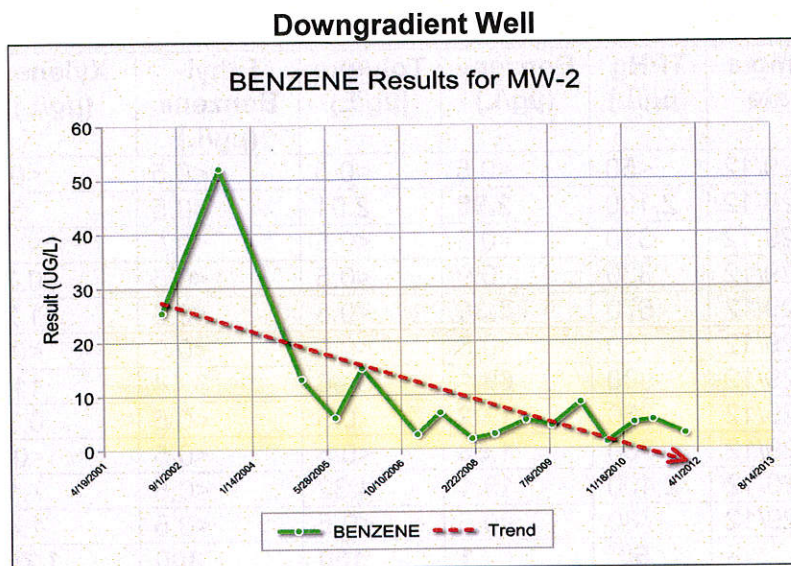
NA: Not Analyzed, Not Applicable or Data Not Available

mg/kg: milligrams per kilogram, parts per million

<: Not detected at or above stated reporting limit

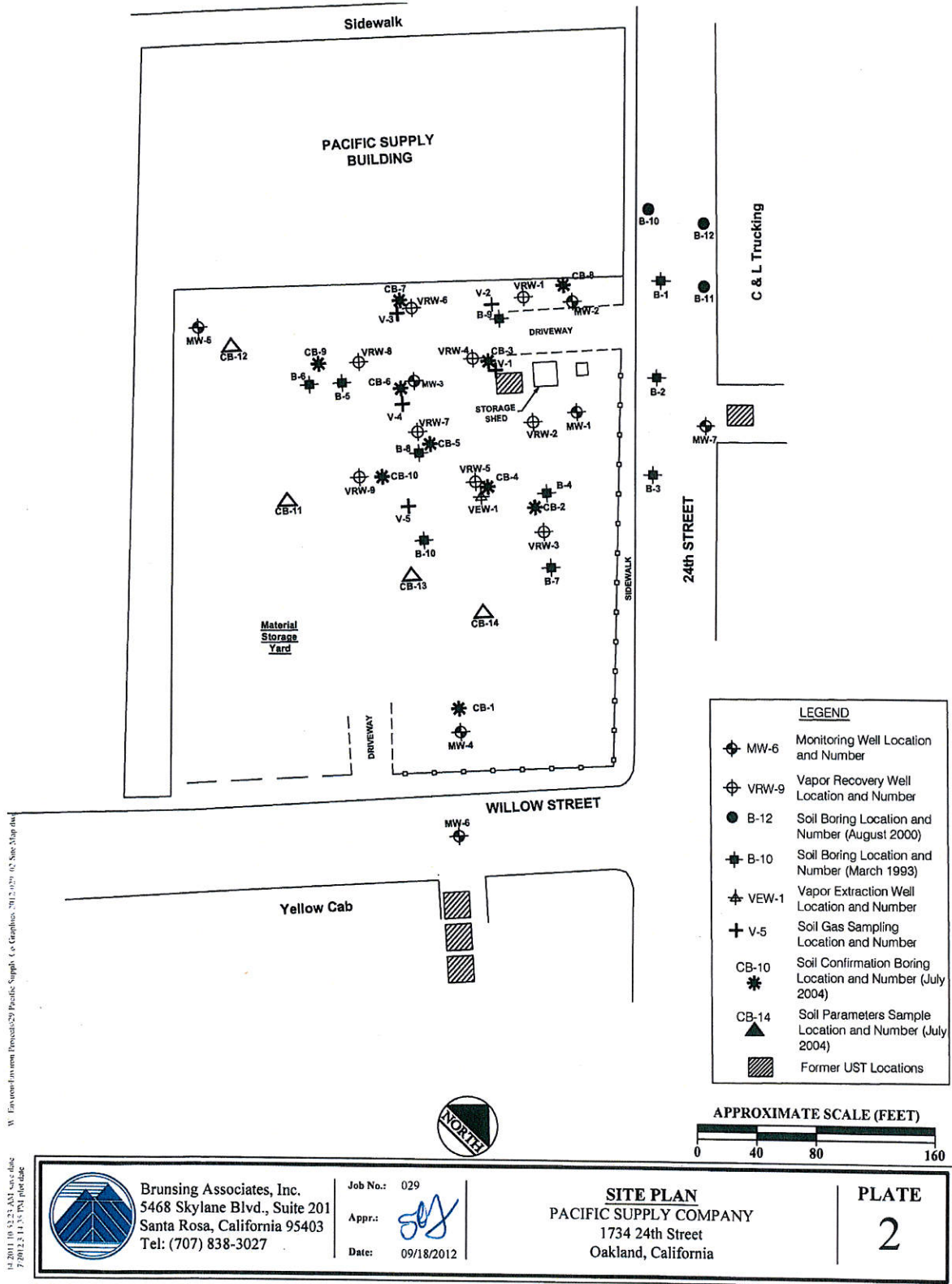
PAHs: Polycyclic aromatic hydrocarbons

*Post remediation samples not collected



Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/ Groundwater tested for methyl tert-butyl ether (MTBE): Yes, see table above.
- Oxygen Concentrations in Soil Vapor: None reported.
- Plume Length: <250 feet, projected plume boundary.
- Plume Stable or Degrading: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets the Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the projected plume boundary. The dissolved concentration of benzene is less than 3,000 µg/L and the dissolved concentration of MTBE is less than 1,000 µg/L. The strong downward trend in downgradient well MW-2 suggest this plume is degrading.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 2a by Scenario 3a. The maximum benzene groundwater concentration is less than 100 µg/L. The minimum depth to groundwater is greater than 5 feet, which is overlain by soil containing less than 100 mg/kg of TPHg. No structures above either the groundwater plume or residual soil contamination.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 3b. A professional assessment of site-specific risk from exposure shows exposure shows that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health. The Site is paved preventing direct exposure. Confirmation soil samples collected in 2004 between 6.5 and 8 feet bgs were below Table 1 thresholds. Soil vapor extraction was conducted for 2.5 years and was discontinued when extraction rates dropped precipitously, evidence that all significant shallow residual hydrocarbons have been removed.



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	Brusing Associates, Inc. 5468 Skylane Blvd., Suite 201 Santa Rosa, California 95403 Tel: (707) 838-3027	Job No.: 029 Appr.:  Date: 09/18/2012	SITE PLAN PACIFIC SUPPLY COMPANY 1734 24th Street Oakland, California	PLATE 2
	APPROXIMATE SCALE (FEET) 			

1