Response to Public Comments received from
Environmental & Geologic Solutions on September 30, 2015
Regarding the Closure Recommendation for Dan's Service Center,
Located at 1120 Whitley Avenue, Corcoran,
Claim 254

A comment letter prepared by Environmental & Geologic Solutions dated September 30, 2015, was submitted to the State Water Board. The reasons presented for not closing the site are summarized briefly below, with this response dated November 30, 2015 from State Water Board staff.

Comment 1: Groundwater monitoring was not performed on a regular basis, and groundwater monitoring data is incomplete, i.e., groundwater samples were collected but depth to water at the time of sampling was not recorded. Therefore, neither historical groundwater flow direction nor the historical distribution of contaminants in groundwater can be determined.

Comment 2: The direction of groundwater flow has been variable, and data for the west side of the property is lacking. It is the opinion of EGS that the previous consultant did not go deep enough to define the soil or groundwater plumes.

Response 1 and 2:
State Water Board staff agrees that the environmental compliance, reporting and oversight for the Site are very poor; however, lack of groundwater data from the past does not warrant continued groundwater monitoring in the present and future. There is sufficient data from two other cases within 200 feet of the Site that support the historical flow direction and flat gradient reported more than once at the Site.

The Policy defines a plume as the extent of constituent concentrations that exceed Water Quality Objectives (WQOs). The existing Site data sufficiently defines the historical distribution of constituent concentrations. The only Site constituent that exceeds its WQO is total petroleum hydrocarbons as diesel (TPHd). There is no historical record of a diesel underground storage tank (UST) at the Site; and there is no indication in GeoTracker that TPHd analyses were requested or performed in the 16 years prior to 2014. Based on the Site age and history, and lacking silica gel cleanup results, the petroleum hydrocarbons reported as TPHd may be weathered total petroleum hydrocarbons as gasoline (TPHg), motor oil, non-polar compounds or a combination of the three. The *Technical Justification for Groundwater Plume Lengths, Indicator Constituents, Concentrations and Buffer Distances* states that TPHd was not included as an indicator constituent for plume length due to its low solubility; and also that total petroleum hydrocarbons as gasoline (TPHg) should be sufficient to represent the extent of a dissolved hydrocarbon release. TPHg has not been detected in groundwater at the site since 1998; therefore there is no TPHg plume. To be conservative, State Water Board staff evaluated the TPHd plume in lieu of the TPHg plume. The extent of the TPHd plume is stable, defined and less than 250 feet in length.

The available soil and groundwater data indicate that the lateral and vertical extent of affected soil has been sufficiently delineated, and the lateral extent of affected groundwater has been defined. The current groundwater data do not warrant additional vertical soil or groundwater investigation.

Comment 3: Central Valley Regional Water Quality Control Board (CVRWQCB) requires a Sensitive Receptor Survey (SRS). EGS was in the process of preparing an SRS but were told to postpone further work pending the State Board staff's final decision regarding case closure.

Response 3: As stated in the Objections and Response to Comments posted on GeoTracker, the groundwater data for the Site indicate that groundwater is unlikely to pose a risk to potential receptors within 1,000 feet of the Site. With the exception of TPHd and tertiary butyl alcohol (TBA), the Site groundwater wells indicate no detectable petroleum hydrocarbon constituents. In addition, drinking water is supplied to the Site by the City of Corcoran and there are no public water supply wells or surface water bodies within 1,000 feet of the Site. Due to the lack of significant detections, limited plume length and public water supply, the identification of additional sensitive receptors beyond those listed will not change the closure determination.

Comment 4: The site does not meet parts E and F under the General Criteria section of the LTCP.

Response 4: The referenced parts are as follows:

e. A conceptual model that assesses the nature, extent and mobility of the release has been developed.

f. Secondary source has been removed to the extent practicable.

The Site data is poor, but sufficient information is available to prepare a Conceptual Site Model. The nature of the release (gasoline from a UST) has been documented. The extent of the release to soil and groundwater has been sufficiently delineated, and the limited mobility of the released petroleum hydrocarbons has been documented. The supporting data and analysis used to develop the CSM are not required to be contained in a single report and may be contained in multiple reports submitted to the regulatory agency over a period of time. It is neither reasonable nor necessary to spend additional money to assess or remediate soil and groundwater that does not pose a risk to human health.

The soil and groundwater data indicate that the bulk of the release to soil was removed during the removal of the USTs, despite the lack of documentation of overexcavation. The groundwater data clearly demonstrate that secondary source, such as remaining mass in soil, does not contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria in the Policy. The Policy states that active remedial actions shall not be required by regulatory agencies unless (1) it is necessary to abate a demonstrated threat to human health, or (2) the groundwater plume does not meet the definition of low threat as described in the Policy. Site groundwater conditions are not a threat to human health and meet the definition of low threat, therefore no remediation is required.