
San Francisco Bay Regional Water Quality Control Board

December 6, 2013
File No. 38-0025 (CLP)

Vivian Gomez-Latino
State Water Resources Control Board
1001 I Street, PO Box 2231
Sacramento, CA 95812
USTClosuresComments@waterboards.ca.gov

SUBJECT: Comment Letter – ARCO Station No. 6185 Proposed Case Closure,
5898 Mission Street, San Francisco

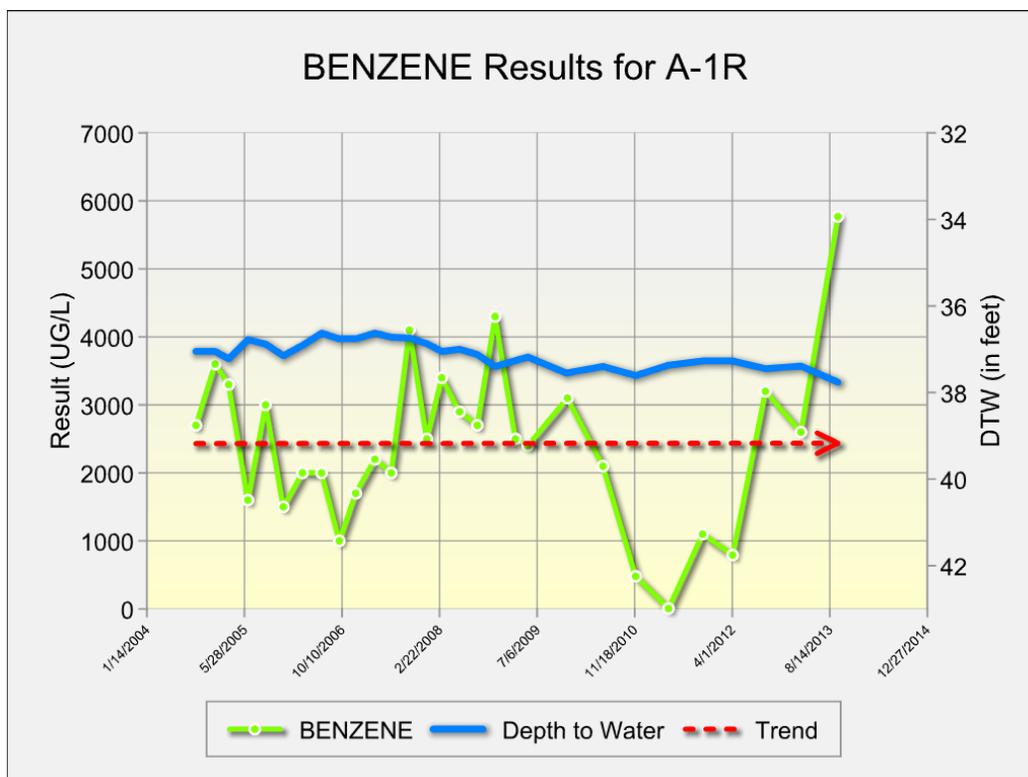
Dear Ms. Gomez-Latino:

The San Francisco Bay Regional Water Board objects to the proposed closure of the underground storage tank (UST) case at 5898 Mission Street, San Francisco (GeoTracker Global ID T0607500024). We support the concerns raised by Ms. Elyse Heilshorn with the City and County of San Francisco Department of Public Health, Environmental Health Section. Additional investigation and corrective action at this site should be conducted under the oversight of the San Francisco Local Oversight Program (LOP).

This case does not meet the criteria of the Low Threat Closure Policy and should not be closed for the following reasons:

- 1. General Criterion E has not been met** (A conceptual site model that addresses the nature, extent, and mobility of the release has been developed.): The conceptual site model for this site is not complete. The *extent* of contamination in groundwater has not been delineated to the southwest of the site in the direction of Sickles Avenue. The maximum concentrations of benzene and total petroleum hydrocarbons as gasoline (TPH-g) at the site were detected in the sample collected from hydropunch boring HP-2 from 33 to 43 feet bgs (19,000 µg/L and 110,000 µg/L respectively). There is no delineation of the extent of this contamination to the southwest.
- 2. General Criterion F has not been met** (Secondary Source has been removed to the extent practicable): As discussed by the LOP in their comment letter dated November 14, 2013 objecting to the closure of this case, the elevated concentrations of benzene and TPH-g detected in the sample from hydropunch boring HP-2 indicates a newly identified secondary source. No secondary source removal has been attempted since this data was received. As discussed below, the groundwater plume does not meet the definition of low threat as described in the low threat closure policy; therefore, additional mass removal or remedial action is warranted.

3. Groundwater Specific Criteria have not been met: Based on all available data, none of the groundwater specific criteria are met. The length of the benzene plume exceeding water quality objectives is approximately 200 feet (as drawn on Figure 10 of the *Amended Request for Low-Threat Closure*, dated August 23, 2013). Since the plume length is over 100 feet, Class 1 is not met. The plume is not delineated; consequently, the total extent of the plume may exceed 250 feet, which could rule out Class 2 and 3 as well. The maximum concentration of benzene at the site is 5,770 $\mu\text{g/L}$, which exceeds the thresholds in Classes 2 and 4. The remaining criteria, Criteria 3 and 5, require a demonstration that the plume has been stable or decreasing or that water quality objectives will be met in a reasonable timeframe, respectively. As demonstrated in the graph below, concentrations in source area well A-1R have been steadily *increasing*, with seasonal variation, since May 2011, and now exceed the previous maximum concentration observed in this well. A regression analysis indicating an overall decreasing trend was provided in the August 2013 *Amended Report for Low-Threat Closure*; however, concentrations of benzene have continued to increase since the linear regression analysis was completed. A decreasing trend is no longer present in this source area well, and it is not demonstrated that the water quality objective for benzene (1 $\mu\text{g/L}$) will be met in a reasonable timeframe without additional corrective action. Therefore, none of the Groundwater-specific criteria are met.



If you have any questions, please contact Ms. Cheryl Prowell of my staff at (510) 622-2408 [e-mail cheryl.prowell@waterboards.ca.gov].

Sincerely,

Bruce H. Wolfe
Executive Officer

cc:

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