

State Water Resources Control Board

December 17, 2014

Mr. David E. Murray
PCC Flow Technologies Holdings, Inc.
4600 SE Harney Drive
Portland, OR 97206-0898

Dear Mr. Murray:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE, PACO PUMPS INC, 9201 SAN LEANDRO STREET, OAKLAND, ALAMEDA COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject site has the following identification numbers:

- GeoTracker No. T0600101592
- San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board) Case No. 01-1721
- Alameda County Health Care Services (Alameda County) Case No. RO0000320

The State Water Board reviewed the closure request dated January 8, 2014 and responses from Alameda County. After careful consideration of the GeoTracker record, Water Board staff agrees with the Alameda County staff determination that all of the Media-Specific Criteria have not been met. Based on information in the above-referenced case file, this agency finds that this site does not meet the following Media-Specific Criteria:

- Groundwater-Specific Criteria (2) d – The dissolved concentration of benzene is less than 3,000 micrograms per liter ($\mu\text{g/L}$).
- Petroleum Vapor Intrusion to Indoor Air Criteria Scenario 4 – Site-specific conditions at the release site satisfy all of the characteristics and criteria of Scenario 4 (1 of 2).
- Direct Contact and Outdoor Air Exposure Criteria a – Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs). Both the 0 to 5 feet bgs concentration limits and the 5 to 10 feet bgs concentration limits for the appropriate site classification (Residential or Commercial/Industrial) shall be satisfied. In addition, if exposure to construction workers or utility trench workers is reasonably anticipated, the concentration limits for Utility Worker shall also be satisfied. Sampling and analysis for poly-aromatic hydrocarbons (PAHs) is only necessary where soil is affected by either waste oil or Bunker C fuel.

There is a significant amount of benzene in shallow groundwater west of the former UST in Area 4. During 2011 and 2012, benzene concentrations in well E-10 were 4,350 µg/L and 3,090 µg/L, respectively. The soil gas concentration for benzene, near sampling point SV-1, was above the threshold indicated in Scenario 4 when oxygen is less than 4 percent. During April 2013, concentrations of total petroleum hydrocarbons in as motor oil (TPHmo) in groundwater ranged between 357,000 µg/L and 323 µg/L. Elevated concentrations of TPHmo indicate the presence of a secondary source of waste oil in shallow soil and groundwater beneath the south end of Building 3. Soil sampling and analysis of naphthalene and PAHs have not been conducted beneath Building 3.

Petroleum constituents in soil and groundwater continue to pose a threat to human health, safety and the environment. Criteria for low-threat UST case closure have not been met at this time, and therefore, closure of the UST case is not appropriate.

If you have any questions, please contact Mr. Benjamin Heningburg at (916) 341-5749 or Benjamin.Heningburg@waterboards.ca.gov.

Sincerely,



Victoria A. Whitney, Deputy Director
Division of Water Quality

cc: Mr. Dallas Nelson
GP Holdings LLC
5977 Keith Avenue
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[Via email only]

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