State Water Resources Control Board

REVIEW SUMMARY REPORT – ADDITIONAL WORK
SECOND REVIEW – FEBRUARY 2016

Agency Information

Agency Name: Alameda County Environmental Health Department (County)	Address: 1131 Harbor Bay Parkway Alameda, CA 94502
Agency Caseworker: Mark Detterman	Case No.: RO0000473

Case Information

USTCF Claim No.: 16793	GeoTracker Global ID: T0600191157
Site Name: ARCO	Site Address: 15101 Freedom Avenue San Leandro, CA 94578
Responsible Party: Mohamed Pazdel	Address: Private Address
Responsible Party: Michale D. Liberty Attn: Hamid Khatirine	Address: Private Address
USTCF Expenditures to Date: $1,316,736	Number of Years Case Open: 16

To view all public documents for this case available on GeoTracker use the following URL:
http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600191157

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 does not meet all of the required criteria of the Policy. Highlights of the case follow:

This case is an active commercial petroleum fueling facility. An unauthorized release was reported in May 1999 following the removal of three gasoline USTs and an unknown volume of contaminated soil was excavated to depths between 16 and 24 feet below ground surface (bgs). Mobile multi-phase extraction has been conducted since November 2007, which removed 3,320 pounds of total petroleum hydrocarbons as gasoline (TPHg) as of September 2014. Groundwater extraction has been conducted since October 2009, which removed 3.7 million gallons of contaminated groundwater as of September 2015. The extraction rate of TPHg was 1.1 pounds per day. Since 2002, 15 groundwater monitoring and four remediation wells have been installed and monitored; two wells have been abandoned. According to groundwater data, water quality objectives have not been achieved.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the defined plume boundary. Reportedly, an impacted domestic well, located at 1573 153rd Road, lies less than 1,000 feet southwest (downgradient) of the Site. The unauthorized release is located within the service area of a public water system, as defined in the Policy.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case does not meet Policy criteria because the contaminant plume that exceeds water quality objectives is greater than 250 feet in length, while the maximum dissolved concentration of benzene is greater than 1,000 micrograms per liter (µg/L).
- Vapor Intrusion to Indoor Air: Onsite, this active fueling facility meets the Active Commercial Petroleum Fueling Facility Exception. Exposure to petroleum vapors associated with historical fuel system releases is comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities. Offsite, a residence lies adjacent to the Site, where no shallow soil samples have been collected.
- Direct Contact and Outdoor Air Exposure: This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from potential exposure to residual soil contamination was completed by Fund staff. The results of the assessment found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. An unknown volume of contaminated soil was excavated to depths between 16 and 24 feet bgs in May 1999. The Site is paved and accidental exposure to site soils is prevented. Therefore, the pathway is incomplete. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.

Objections to Closure and Responses

According to the LTCP Checklist page in GeoTracker dated May 29, 2015, County staff objects to UST case closure because:

- Free product remains.
  RESPONSE: Free product has not been observed since 2014.
- The case does not meet Policy Groundwater criteria.
  RESPONSE: The case does not meet Policy criteria because the contaminant plume that exceeds water quality objectives is greater than 250 feet in length, while the maximum dissolved concentration of benzene is greater than 1,000 µg/L.
- The case does not meet Policy Vapor Intrusion to Indoor Air criteria.
  RESPONSE: Onsite, this active fueling facility meets the Active Commercial Petroleum Fueling Facility Exception. Exposure to petroleum vapors associated with historical fuel system releases is comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities. Offsite, a residence lies adjacent to the Site, where no shallow soil samples have been collected.
- The case does not meet Policy Direct Contact and Outdoor Air Exposure criteria.
  RESPONSE: This case meets Policy Criterion 3b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from potential exposure to residual soil contamination was completed by Fund staff. The results of the assessment found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. An unknown volume of contaminated soil was excavated to depths between 16 and 24 feet bgs in May 1999. The Site is paved and accidental exposure to site soils is prevented. Therefore, the pathway is incomplete. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily

work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.

Recommendation

State Water Board staff recommends that the County direct the responsible party to turn-off the groundwater extraction system and conduct a rebound test. In addition, State Water Board staff concurs with the County that it would be prudent to collect shallow soil samples (5 feet, 10 feet bgs) on the southwest boundary of the site to assess the potential for indoor vapor migration from shallow soil into indoor vapor consistent with the Policy.

State Water Board staff also recommend that this site initiate an Expedited Cleanup Account Program-like process and develop a project execution plan, cost estimate and schedule of tasks necessary to bring this site to closure. The first step will be to update the Low-Threat Closure Policy Checklist and Path to Closure Plan in GeoTracker with the most recent information and the identify specific tasks necessary to address the remaining impediments to closure. To date, $1,316,736 of Cleanup Fund assets have been expended.

2/10/16
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3/10/16
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