



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 19, 2013

Mr. James E. Diel
Manager of Environmental Site Remediation
Union Pacific Railroad Company
9451 Atkinson Street, Suite 100
Roseville, CA 95747
Sent via E-mail to: jedi@up.com

Mr. John W. Bacon, Jr.
c/o Economy Lumber Company
750 High Street.
Oakland, CA 94601-4402
Sent via E-mail to: jbacon@economylumberco.com

Subject: Modified Work Plan Approval, Fuel Leak Case No. RO1135 and GeoTracker Global ID
T0600101305, 744 and 758 High Street, Oakland, CA 94601

Dear Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Site Conceptual Model Report and Data Gap Work Plan* (Work Plan) dated March 29, 2013 prepared by CH2MHill for the subject site on your behalf. Thank you for submitting the report. The Work Plan proposes the installation of twenty direct-push borings to collect soil and groundwater samples.

At this juncture, ACEH has also evaluated available data including the Work Plan with respect to the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted August 17, 2012. Based on ACEH staff review, we have determined that because insufficient information has been collected at the site, the site does not appear to meet any of the LTCP Criteria. Specifically, the site appears not to meet LTCP General Criteria b (Unauthorized release consists only of petroleum), e (Site Conceptual Model), f (Secondary Source Removal), g (MTBE analysis of soil & groundwater), Media-Specific Criteria: Groundwater, Media-Specific Criteria: Petroleum Vapor Intrusion to Indoor Air, and Media-Specific Criteria: Direct Contact and Outdoor Air Exposure. ACEH's evaluation of the LTCP may be found in Attachment A.

Based on ACEH staff review of the Work Plan the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed field investigation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the Work Plan or technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **LTCP Compliance:** As noted above, the site does not meet the LTCP based on the following summary and further investigation, which the proposed Work Plan will partially address, appears warranted.
 - a. **General Criteria b - Petroleum Release Only:** ACEH's review of the case file indicates that non-petroleum contaminants have been detected in soil and groundwater at the site. Specifically, 2,500 mg/kg polychlorinated biphenyls (PCBs) and 1,110 mg/kg lead were detected in soil.
 - b. **General Criteria e - Site Conceptual Model:** Due to the absence of any site groundwater monitoring wells and groundwater volatile organic compound (VOC) analytical data, the areal and vertical extent of groundwater contamination, if any, is unknown. Additionally, vertical contaminant extent in soil and soil vapor extent is unknown.
 - c. **General Criteria f - Secondary Source:** Secondary source(s) are unidentified and not defined laterally and vertically.
 - d. **General Criteria g - (Methyl Tertiary-Butyl Ether-MTBE):** Due to the lack of VOC analytical data, this criteria is not satisfied.
 - e. **LTCP Media-Specific Groundwater Criteria -** Due to the absence of site groundwater monitoring wells, unknown groundwater flow direction, and gradient, and the lack of sufficient groundwater VOC analytical data, the areal extent of the plume (if any) is unknown. Therefore ACEH cannot classify the site into any of the five classes LTCP classes.
 - f. **LTCP Media-Specific Vapor Intrusion to Indoor Air Criteria –** Due to the absence of soil gas, soil, and groundwater VOC analytical data, ACEH cannot evaluate this site for vapor intrusion.
 - g. **LTCP Media-Specific Direct Contact and Outdoor Air Criteria –** Due to the lack of analytical data, specifically benzene, ethylbenzene, naphthalene, and polycyclic aromatic hydrocarbons (PAHs) in soil at the depth intervals of 0 to 5 feet and 5 to 10 feet below grade, ACEH cannot evaluate this site for direct contact and outdoor air exposure.
2. **Work Plan Modifications –** The referenced Work Plan proposes a series of actions with which ACEH is in general agreement with; however, ACEH requests several modifications to the approach. Based on the Site Conceptual Model (SCM)'s description of operations, source areas, and release mechanisms and uncertain historical site usage, ACEH requests the following revisions to the Work Plan be addressed while conducting the field work. Please submit an updated SCM and soil and groundwater investigation report by the date specified below.

- a. **Soil Sample Collection Protocol** - The Work Plan indicates proposed sample collection depths but states that final depths of the boring will be based on field observations and measurements. Since the goal of this investigation is to meet LTPC criteria by determination of the lateral, down gradient, and vertical extent of total petroleum hydrocarbon (TPH) contamination in soil and groundwater beneath the site, ACEH recommends that soil samples should be collected and analyzed at areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical and horizontal extent of TPH impacts at the site. ACEH requests soil sample collection below or at first encountered groundwater based on indications of contamination (PID detections, odor, staining, or etc.). If visual indications are not encountered, please collect soil samples at or just above the soil – water interface and the bottom of the boring. Please ensure that the analytical results determine the vertical and horizontal extent of TPH impacts at the site.
 - b. **Soil and Groundwater Analyses** – In addition to the proposed analyses, please analyze all selected soil and groundwater samples by Method 8270 for semi volatile organic compound (SVOCs) and by Method 8260 for TPH-Gasoline, benzene, toluene, ethyl benzene, and xylenes (BTEX), ethylene dibromide (EDB), ethylene dichloride (EDC), Methyl Tertiary-Butyl Ether (MTBE), Tert-amyl-methyl ether (TAME), Ethyl tert-butyl ether (ETBE), Di-isopropyl ether (DIPE), and t-Butyl alcohol (TBA).
 - c. **Additional Soil Borings:** Soil borings are proposed to be located adjacent to missing monitoring wells MW-A-1, MW-C-2, and MW-C-5, but no borings are proposed adjacent to MW- A-5, MW-B-2, and MW-C-6. Because of the lack of groundwater quality data, ACEH requests placement of soil borings adjacent to MW-A-5, MW-B-2, and MW-C-6 and collection of soil and groundwater samples as proposed in the Work Plan and requested in Technical Comment 2b.
 - d. **Investigation of Identified Data Gap:** Additional investigation of the three severed steel risers adjacent to the railroad tracks along the northeastern site boundary appears warranted as these three risers may indicate a primary source.
3. **Basin Plan Groundwater Classification and Environmental Screening Levels:** The Constituents of Potential Concern (COPCs) are compared to Table B, Environmental Screening Levels (ESLs) Shallow Soil (<3m bgs), Groundwater not a Current or Potential Source of Drinking Water, from the San Francisco Regional Water Quality Control Board (SFRWQCB) May 2008 *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater* Guidance. The ESLs were updated in February and May 2013. Please use the most recent edition of the ESLs.

Additionally, all groundwater in the East Bay Plain Groundwater Basin is classified as 'MUN' (potentially suitable for municipal or domestic water supply). According to the SFRWQCB's Water Quality Control Plan (Basin Plan), dated January 18, 2007, for the San Francisco Bay

Basin, "the term 'groundwater' includes all subsurface waters, whether or not these waters meet the classic definition of an aquifer or occurs within identified groundwater basins." The Basin Plan also states that "all groundwaters are considered suitable, or potentially suitable, for municipal or domestic water supply (MUN)." Therefore, the groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan. Please use Summary Table A ESLs Shallow Soil (<3m bgs), Groundwater is a Current of Potential Source of Drinking Water as a basis for comparison of COPCs in all future site documents.

- 4. Location of Six Missing Groundwater Monitoring Wells** - Wells MW-A-1, MW-A-5, MW-B-2, MW-C-2, MW-C-5, and MW-C-6 were last sampled on September 8, 1993 and have not been located since then due to site redevelopment and/or site repaving. A footnote on Figure 2-5 indicates that on August 19, 1993 each monitoring well was found to be missing as much as 12 inches of the upper casing. The Work Plan indicated that despite performing a visual inspection and a subsurface geophysical survey on February 13, 2013, none of the wells were located, so the Work Plan did not include further attempts for well location, rehabilitation, survey, or sampling of the six wells. As a part of the case closure process, ACEH will require relocating and decommissioning of the wells, but because of the critical need to obtain grab groundwater analytical data from direct push borings, this activity can be completed at a later date.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to ACEH (Attention: Karel Detterman), according to the following schedule:

- **September 20, 2013 – SCM Update and Soil and Groundwater Investigation**
File to be named: RO1135_SCM_SWI_R_yyyy-mm-dd

This report is being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH requests you provide your email address so that we can correspond with you quickly and efficiently regarding your case. As noted in Attachment 1, ACEH no longer accepts paper copies.

Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6708 or send me an e-mail message at karel.detterman@acgov.org

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

Gentlemen
July 19, 2013
RO1135, Page 5

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

Attachment A – Geotracker LTCP Checklist

cc: David Hobson, CH2MHill (Sent via E-mail to: David.Hodson@CH2M.com)
Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
Leroy Griffin, Oakland Fire Department, (Sent via E-mail to: lgriffin@oaklandnet.com)

GeoTracker, Electronic Case File

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 7835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) require submission of all reports in electronic form to the county's FTP site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single Portable Document Format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to .loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses,** and the **Case Numbers (RO# available in Geotracker) you will be posting for.**

- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to .loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload.** (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

ATTACHMENT A

Geotracker LTCP Checklist

744 HIGH STREET
OAKLAND, CA 94601
ALAMEDA COUNTY

[ACTIVITIES REPORT](#)
[PUBLIC WEBPAGE](#)

CLEANUP OVERSIGHT AGENCIES
ALAMEDA COUNTY LOP (**LEAD**) - CASE #: R00001135
CASEWORKER: [KAREL DETTERMAN](#) - **SUPERVISOR:** DONNA DROGOS
SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: 01-1413
CASEWORKER: [Cherie McCaulou](#) - **SUPERVISOR:** MARY ROSE CASSA

[VIEW PRINTABLE CASE SUMMARY FOR THIS SITE](#)

THIS PROJECT WAS LAST MODIFIED BY [KAREL DETTERMAN](#) ON 12/3/2012 2:25:44 PM - [HISTORY](#)

CLOSURE POLICY

THIS VERSION IS IN PROGRESS AS OF 12/3/2012

[CLOSURE POLICY HISTORY](#)

General Criteria - The site satisfies the policy general criteria - [CLEAR SECTION ANSWERS](#)

NO

- a. Is the unauthorized release located within the service area of a public water system?
 YES NO
- b. The unauthorized release consists only of petroleum ([info](#)).
 Chlorobenzene PCE TCE Chloroform Vinyl Chloride Bromoform
 Other: YES NO
- c. The unauthorized ("primary") release from the UST system has been stopped. YES NO
- d. Free product has been removed to the maximum extent practicable ([info](#)). FP Not Encountered YES NO
- e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed ([info](#)).

Description (Check all that Apply):

 GW Not Evaluated
 Groundwater Assessment Incomplete - Aerial Extent of Contamination Not Defined
 Groundwater Assessment Incomplete - Depth of Contamination Not Defined
 Hydrogeology Not Adequately Defined
 Potential Receptors Not Identified
 Soil Assessment Incomplete - Aerial Extent Not Defined
 Soil Assessment Incomplete - Depth Unknown
 Soil Vapor Not Evaluated
 Other -

 YES NO
- f. Secondary source has been removed to the extent practicable ([info](#)).

Impediment to Removing Secondary Source (Check all that Apply):

 Remediation Has Not Been Attempted
 Remediation Was Designed Incorrectly
 Remediation Was Shut Off Prematurely
 Poor Remediation O&M
 Other -

 YES NO
- g. Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15. Not Required YES NO
- h. Does a nuisance exist, as defined by [Water Code section 13050](#). YES NO

1. Media-Specific Criteria: Groundwater - The contaminant plume that exceeds water quality objectives is stable or decreasing in areal extent, and meets all of the additional characteristics of one of the five classes of sites listed below. - [CLEAR SECTION ANSWERS](#)

NO

EXEMPTION - Soil Only Case (Release has not Affected Groundwater - [Info](#)) YES NO

Does the site meet any of the Groundwater specific criteria scenarios? YES NO

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

- Plume Length (That Exceeds Water Quality Objectives) :**
 ≥ 100 Feet and < 250 Feet ≥ 250 Feet and < 1,000 Feet ≥ 1,000 Feet Unknown
- Free Product in Groundwater :**
 Yes No Unknown
- Free Product Has Been Removed to the Maximum Extent Practicable :**
 No Unknown
- For sites with free product, the Plume Has Been Stable or Decreasing for 5-Years (info) :**
 No Unknown
- For sites with free product, owner Willing to Accept a Land Use Restriction (if required) :**
 No Unknown
- Free Product Extends Offsite :**
 Yes Unknown
- Benzene Concentration :**
 ≥ 1,000 µg/l and < 3,000 µg/l ≥ 3,000 µg/l Unknown
- MTBE Concentration :**
 ≥ 1,000 µg/l Unknown

Nearest Supply Well (From Plume Boundary) :

- ≤ 250 Feet > 250 Feet and ≤ 1,000 Feet Unknown

Nearest Surface Water Body (From Plume Boundary) :

- ≤ 250 Feet > 250 Feet and ≤ 1,000 Feet Unknown

2. Media Specific Criteria: Petroleum Vapor Intrusion to Indoor Air - The site is considered low-threat for the vapor-intrusion-to-air pathway if site-specific conditions satisfy items 2a, 2b, or 2c - [CLEAR SECTION ANSWERS](#)

NO

EXEMPTION - Active Commercial Petroleum Fueling Facility

YES NO

Does the site meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios?

YES NO

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

Soil Gas Samples :

- No Soil Gas Samples Taken Incorrectly Not Taken at Two Depths Within 5ft Zone

Exposure Type :

- Residential Commercial

Free Product :

- In Groundwater In Soil Unknown

TPH in the Bioattenuation Zone :

- ≥ 100 mg/kg Unknown

Bioattenuation Zone Thickness :

- < 5 Feet (No BioZone) ≥ 5 Feet and < 10 Feet ≥ 10 Feet and < 30 Feet ≥ 30 Feet 30ft BioZone Compromised TPH > 100mg/kg Unknown

O2 Data in Bioattenuation Zone :

- No O₂ Data O₂ < 4% O₂ ≥ 4%

Benzene in Groundwater :

- ≥ 100 µg/l and < 1,000 µg/l ≥ 1,000 µg/l Unknown

Soil Gas Benzene :

- ≥ 85 µg/m³ and < 280 µg/m³ ≥ 280 µg/m³ and < 85,000 µg/m³ ≥ 85,000 µg/m³ and < 280,000 µg/m³ ≥ 280,000 µg/m³ Unknown

Soil Gas EthylBenzene :

- ≥ 1,100 µg/m³ and < 3,600 µg/m³ ≥ 3,600 µg/m³ and < 1,100,000 µg/m³ ≥ 1,100,000 µg/m³ and < 3,600,000 µg/m³ ≥ 3,600,000 µg/m³ Unknown

Soil Gas Naphthalene :

- ≥ 93 µg/m³ and < 310 µg/m³ ≥ 310 µg/m³ and < 93,000 µg/m³ ≥ 93,000 µg/m³ and < 310,000 µg/m³ ≥ 310,000 µg/m³ Unknown

3. Media Specific Criteria: Direct Contact and Outdoor Air Exposure - The site is considered low-threat for direct contact and outdoor air exposure if it meets 1, 2, or 3 below. - [CLEAR SECTION ANSWERS](#)

NO

EXEMPTION - The upper 10 feet of soil is free of petroleum contamination

YES NO

Does the site meet any of the Direct Contact and Outdoor Air Exposure criteria scenarios?

YES NO

ADDITIONAL QUESTIONS - Please indicate only those conditions that do not meet the policy criteria:

Exposure Type :

- Residential Commercial Utility Worker

Petroleum Constituents in Soil :

- ≤ 5 Feet bgs >5 Feet bgs and ≤10 Feet bgs Unknown

Soil Concentrations of Benzene :

- > 1.9 mg/kg and ≤ 2.8 mg/kg > 2.8 mg/kg and ≤ 8.2 mg/kg > 8.2 mg/kg and ≤ 12 mg/kg > 12 mg/kg and ≤ 14 mg/kg > 14 mg/kg Unknown

Soil Concentrations of EthylBenzene :

- > 21 mg/kg and ≤ 32 mg/kg > 32 mg/kg and ≤ 89 mg/kg > 89 mg/kg and ≤ 134 mg/kg > 134 mg/kg and ≤ 314 mg/kg > 314 mg/kg Unknown

Soil Concentrations of Naphthalene :

- > 9.7 mg/kg and ≤ 45 mg/kg > 45 mg/kg and ≤ 219 mg/kg > 219 mg/kg Unknown

Soil Concentrations of PAH :

- > 0.063 mg/kg and ≤ 0,68 mg/kg > 0.68 mg/kg and ≤ 4.5 mg/kg > 4.5 mg/kg Unknown

Area of Impacted Soil :

- Area of Impacted Soil > 82 by 82 Feet Unknown

Additional Information

This case should be closed in spite of NOT meeting policy criteria.

YES NO

[SPELL CHECK](#)

Save in Progress

Save as Final