

State Water Resources Control Board

MAR 13 2017

Equilon Enterprises LLC dba Shell Oil Products US
Attention: Ms. Deborah Pryor
20945 S. Wilmington Avenue
Carson, CA 90810-1039
[Via email only] (Deborah.Pryor@shell.com)

C and J Cox Corporation
Attention: Mr. Carl Cox
4431 Stoneridge Drive, Suite 100
Pleasanton, CA 94588-8412

Dear Ms. Pryor and Mr. Cox:

**CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,
SHELL #13-5244, 8999 SAN RAMON ROAD, DUBLIN, 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 case has the following identification numbers:

- State Water Board, GeoTracker No. T0600159797
- Alameda County Department of Environmental Health (Alameda County), Case No. RO0002744

State Water Board staff reviewed the closure request dated June 10, 2016, and the response from the Alameda County dated August 9, 2016. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Alameda County staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criterion:

- **General Criterion e.** – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.

The methyl tert-butyl ether (MTBE) plume migrated at least 200 feet laterally and 70 feet vertically as either an attached or detached diving plume prior to the commencement of groundwater monitoring in 2005. Contaminants remaining in the source area were significantly weathered at the time of discovery, indicating an older release. The plume boundary is not defined beyond

monitoring wells MW-13C and MW-14C, so the distance from the plume boundary to the nearest existing water supply well cannot be determined.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact George Lockwood at (916) 341-5752 or George.Lockwood@waterboards.ca.gov.

Sincerely,



Karen Larsen, Deputy Director
Division of Water Quality

cc: [Via email only]

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Mr. George Lockwood
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Mr. Ronald Browder
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