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August 7, 2013

Mr. Pete Mizera
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814
(Sent via E-mail to: USTClosuresComments@waterboards.ca.gov)

Subject: **Comment Letter – Oro Loma Sanitary District Case Closure Summary**, Notice of Opportunity for Public Comment; Underground Storage Tank Cleanup Fund Case Closure Recommendation; Claim Number 10630; Fuel Leak Case No. RO0000288 and GeoTracker Global ID T0600101928, Oro Loma Sanitary District, 2600 Grant Avenue, San Lorenzo, CA 94580

Dear Mr. Mizera:

Alameda County Environmental Health (ACEH) staff has received the Underground Storage Tank Cleanup Fund's (USTCF's or Fund's) *Notice of Opportunity for Public Comment* dated June 5, 2013, for the subject site. The purpose of the Notice is to inform interested parties of 1) the USTCF's intent to recommend closure of the subject site to the California State Water Resources Control Board's (SWRCBs) Executive Director, and 2) the sixty day public comment period on the Fund's *UST Case Closure Review Summary Report* (Case Closure Summary), dated June 5, 2013. According to the Notice, written comments to the SWRCB on the Fund's Case Closure Summary must be received by 12:00 noon on August 7, 2013. This letter herein transmits ACEH's comments.

Requirements for Investigation and Cleanup of Unauthorized Releases from USTs

ACEH reviewed the USTCF's *UST Case Closure Review Summary Report*, dated June 5, 2013, prepared by Pat Cullen , and signed by Lisa Babcock, including *Attachment 1: Compliance with State Water Board Policies and State Law* (i.e., the SWRCB's Low-Threat UST Case Closure Policy Paper Check List), and *Attachment 2: Summary of Basic Site Information (Conceptual Site Model)* in conjunction with the case files for the above-referenced site. A complete record of the case files (i.e., regulatory directives and correspondence, reports, data submitted in electronic deliverable format, etc.) can be obtained through review of both the SWRCB's Geotracker database, and the ACEH website at http://www.acgov.org/aceh/index.htm.

ACEH's review was guided by the requirements for investigation and cleanup of unauthorized releases from underground storage tanks (USTs) contained in the following resolutions, policies, codes, and regulations:

- SWRCB's Low-Threat Underground Storage Tank Case Closure Policy (LTCP), adopted on May 1, 2012; and effective August 17, 2012;
- California Code of Regulations (CCR) Title 23, Article 5 and Article 11, Underground Storage Tank Regulations, as amended and effective July 1, 2011;
- California Health & Safety Code (HS&C) Sections 25280-15299.8, Underground Storage of Hazardous Substances, as amended on January 1, 2011;
- SWRCB Resolution 1992-0049, Policies and Procedures for the Cleanup and Abatement of Discharges under California Water Code Section 13304, as amended on April 21, 1994 and October 2, 1996;

- San Francisco Bay Regional Water Quality Control Board's (RWQCB) San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan).

Application of Case Review Tools

ACEH's case closure evaluation was also guided by the application of the principles and strategies presented in the *Leaking Underground Fuel Tank Guidance Manual* (CA LUFT Manual), dated September 2012, developed by the SWRCB "…[t]o provide guidance for implementing the requirements established by the Case Closure Policy" and associated reference documents including but not limited to:

- *Technical Justification for Vapor Intrusion Media-Specific Criteria*, SWRCB dated March 21, 2012;
- *Technical Justification for Groundwater Media-Specific Criteria*, SWRCB dated April 24, 2012;
- *Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways*, SWRCB dated March 15, 2012;
- *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, Final* DTSC, dated October, 2011;

ACEH also utilized other case review tools developed by the SWRCB to aid in determining compliance of the subject fuel leak site with LTCP criteria, including both the paper *Policy Checklist* (available at www.waterboards.ca.gov/ust/docs/checklist.pdf) and the electronic version of the *Policy Checklist* (available on the SWRCB's GeoTracker website at http://geotracker.waterboards.ca.gov). ACEH's evaluation of the subject site is presented below and in previously submitted documents posted to Geotracker and the ACEH ftp website.

Summary of ACEH's Review of the USTCF's UST Case Closure Summary

ACEH does not agree with the USTCF's Conceptual Site Model (CSM) nor the technical analysis presented in the *UST Case Closure Summary Report*. Our review indicates the site is uncharacterized in a number of elements, including the lateral extent of contamination, the ability of the public owned treatment works (POTW) to treat contaminated groundwater, and the evaluation of site-specific risk to human health and the environment. Details of our analysis are provided below.

General Criteria a: The unauthorized release is located within the service area of a public water system.
The site meets this General Criteria.
General Criteria b: The unauthorized release consists only of petroleum.
The site meets this General Criteria.
General Criteria c: The unauthorized ("primary") release from the UST system has been stopped.
The site meets this General Criteria.
General Criteria d: Free product has been removed to the maximum extent practicable.
The site meets this General Criteria.
General Criteria e: A conceptual site model has been developed.
The site does not meet this General Criteria. While the LTCP does not require a unifying CSM, ACEH notes that as a result site data is spread across numerous reports and within report sections rather than in tables of available documents. This may be

the source of many data errors identified in ACEH's review of the *Case Closure Review Summary Report* and the *Summary of Basic Site Information (Conceptual Site Model)* and resulting conclusions made by the USTCF based on this data.

A review of site data indicates that the lateral extent of groundwater contamination may not be adequately defined to the east beneath the Oro Loma Sanitary Engineering Building footprint. The extent to which this building is exposed to soil, groundwater, and potential vapor intrusion to indoor air has not been evaluated. Concentrations of 21 milligrams per kilogram (mg/kg) benzene are documented in soil between 5 and 7 feet below ground surface (bgs) immediately adjacent (west) of this building at EP-2. A concentration of 34 mg/kg benzene was detected in the soil sample collected from well MW-6 at a depth of 6 feet bgs; and installed downgradient of and after the remedial excavation. These benzene concentrations also exceed the LTCP Media Specific Criteria for Direct Contact and Outdoor Air Exposure screening levels for commercial / industrial and utility workers.

Benzene concentrations up to 23,000 micrograms per liter (ug/l) and 24,000 ug/l were documented in grab groundwater samples collected in borings EP-2 and EP-8, respectively, located immediately adjacent (west) of the Engineering Building, and east of the area of the remedial excavation.

The most recent (June 2011) groundwater concentration of benzene in MW-5 (installed downgradient of boring EP-2) contained 2,500 µg/l. Prior to June 2011, the concentration of benzene in this well was consistently above 3,000 µg/l, with the exception of one event. Supporting documents for the LTCP (*Technical Justification for Vapor Intrusion Media-Specific Criteria,* March 21, 2012) state that concentrations greater than 3,000 µg/l benzene provide indirect evidence of Light Non-Aqueous Phase Liquids (LNAPL).

In regards to the downgradient extent of the dissolved-phase plume, the USTCF CSM states that should the groundwater contaminant plume reach the main interceptor trench that delivers waste water to the treatment plant, it would be captured and treated by the plant. ACEH's review of available data indicates that the dissolved-phase plume does not extend to the main sewer trunk line rather likely migrates along an abandoned sewer line beneath either the sidewalk or street offsite from the release (groundwater concentrations up to 12,000 µg/l benzene are documented). Should the plume reach the POTW, ACEH's experience indicates that it is very unlikely that the POTW has the capacity to treat this volume of groundwater.

Soil vapor at the site remains essentially unevaluated. Because elevated soil contamination remains within the upper 10 feet of soil after the remedial excavation was conducted and because the depth to groundwater ranges between approximately 4 and 6 feet bgs, a significant vapor source is documented to remain beneath the site. The USTCF's CSM states that the average depth to groundwater at the site is 7 feet bgs. This appears to be in error as the average in June 2011 was 4.91 feet bgs. Limited degradation / attenuation of petroleum vapor concentrations are a concern at the site. Further details are provided below in the Media-Specific Criteria for Vapor Intrusion to Indoor Air section.

General Criteria f: Secondary source removal has been addressed. The secondary source is the petroleum-impacted soil, free product, or groundwater that acts as a long-term source releasing contamination to the surrounding area. Unless site conditions prevent secondary source removal (e.g. physical or infrastructural constraints exist whose removal or relocation would be technically or economically infeasible), petroleum-release sites are required to undergo secondary source removal to the extent practicable.

As defined by the LTCP the secondary source is limited to the immediate vicinity of the point of release. It appears that overexcavation of secondary source(s) in the tank pit has been conducted to the extent practicable due to limitations imposed by site buildings; however, elevated residual petroleum contamination is documented to remain in soil at the source. At a depth of 3.5 feet bgs soil sample SB-2 contained with 14 mg/kg benzene and 130 mg/kg ethylbenzene. Site documents indicate the location of SB-2 was proposed to be outside the area of excavation and the removal of this soil during remedial excavation was not confirmed as confirmation sampling was limited to the four corners of the excavation. One of the four excavation confirmation samples collected in May 2008 detected a concentration of 15 mg/kg benzene in soil at a depth of 8 feet bgs. Additional areas of elevated benzene concentrations are present further from the secondary source and include location EP-2 with 21 mg/kg benzene at 5 to 7 feet. Based on site excavation figures removal of this soil does not appear to have occurred. Well MW-6

contained a benzene concentration of 34 mg/kg in April 2008, and was installed after the remedial excavation. Each of these concentrations exceed or equal the LTCP Media Specific Criteria for Direct Contact and Outdoor Air Exposure screening levels for commercial / industrial or utility worker receptors for the appropriate depth range.

General Criteria g: Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code section 25296.15.

Soil and groundwater has been tested for MTBE. The site meets this General Criteria.

General Criteria h: Nuisance as defined by Water Code section 13050 does not exist at the site.

The site meets this General Criteria.

Media-Specific Criteria 1. Groundwater: If groundwater with a designated beneficial use is affected by an unauthorized release, to satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal (sic) extent, and meet all of the additional characteristics of one of the five classes of sites listed in the Policy. A plume that is "stable or decreasing" is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration.

The *Case Closure Review Summary Report* indicates that the Underground Storage Tank Cleanup Fund (USTCF) has determined the site meets Category 5 of the Groundwater Media-Specific Criteria. This consists of an agency determination that an analysis of site specific conditions that the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved in a reasonable time period. The USTCF cites the remedial excavation report that states that less than 100 gallons of groundwater infiltrated the large (40 by 45 by 8 foot) excavation to support that the site has minimal effective porosity to transmit water and soil vapor, and that contamination will stay in place and naturally degrade with time. ACEH notes that the data generated at the site indicate effective migration of concentrations of petroleum hydrocarbons in groundwater to on- and off-site locations that constitute indirect evidence of the presence of Light Non-Aqueous Phase Liquids (LNAPL) per documents released by the SWRCB in support of the LTCP (*Technical Justification for Vapor Intrusion Media-Specific Criteria,* March 21, 2012). ACEH also notes that numerous soil samples also document significant residual contamination downgradient or otherwise outside of the remedial excavation (concentrations up to 34 mg/kg benzene at 6 feet as previously cited above).

ACEH's review indicates that the site does not appear to meet scenarios 1, 2, 3, or 4 of the groundwater media-specific criteria for closure under the LTCP based on the following analysis:

1. There is insufficient data to demonstrate that dissolved concentrations of benzene are consistently less than 3,000 ppb (however limited additional data may establish this trend),
2. San Francisco Bay is less than 1,000 feet from the edge of the hydrocarbon plume, and
3. The dissolved phase plume is apparently captured by an abandoned sanitary sewer utility trench that terminates at the Oro Loma Sanitary District; however, despite multiple requests, the District has not been able to provided data that the abandoned trench backfill water is captured and treated at the POTW.

In regards to the dissolved-phase benzene concentrations, remedial excavation was conducted in May 2008, and post excavation groundwater monitoring occurred until June 2011. Thus contaminant trends three years after the remedial excavation were documented to be fluctuating within previously existing pre-excavation ranges. This suggests that insufficient source removal was achieved; however, ACEH notes that longer term benzene contaminant trends appear to be declining (22,000 ug/l [with TPH concentrations indicative of free product], down to 1,300 to 3,400 ug/l benzene [and also with TPH concentrations slightly below free product concentration ranges]). Because significant soil contamination is documented to remain at the site (up to 34 mg/kg benzene in soil in the water-bearing zone), the capability of the site to naturally attenuate benzene concentrations below 3,000 ug/l at the site remains undetermined.

Media-Specific Criteria 2. Petroleum Vapor Intrusion to Indoor Air: The low-threat vapor-intrusion criteria in the Policy apply to release sites and impacted or potentially impacted adjacent parcels when: (1) existing buildings are occupied or may be reasonably expected to be occupied in the future, or (2) buildings for human occupancy are reasonably expected to be constructed in the near future.

The USTCF's *Case Closure Review Summary Report* indicates that a professional assessment of site-specific risk from vapor intrusion has been conducted and shows that the maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. ACEH notes that the maximum soil concentrations cited in the *Case Closure Review Summary Report* are in error.

As noted above, ACEH's review of site data indicates a significant vapor source remains beneath the site as documented by elevated soil contamination within the upper 10 feet of soil and the shallow depth of contaminated groundwater (between approximately 4 and 7 feet bgs). Therefore, a potential exists for vapor intrusion into indoor air.

Although an investigation was conducted in 1998 to collect soil, groundwater and air sample data (i.e. crawl space air samples discussed below) for use in a RBCA Tier 2 Assessment to support site closure, ACEH's analysis indicates that the data does not satisfy the LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air based as follows:

- An indoor air sampling program conducted in 1998 for the site was done in accordance with vapor intrusion evaluation protocols applicable at that time. However, the scientific and regulatory communities understanding of vapor intrusion has advanced significantly in recent years. The SWRCB's LUFT Manual recognizes this and states that additional data may be required to be collected by the LTCP policy (the "…LTCP contains several areas for which data must be generated during site assessment, and some reflect a new way of thinking about characterizing petroleum release sites. Therefore, it is important to consider the specific data requirements of the Case Closure Policy during development of the work plan/sampling plan.").
- The LUFT Manual refers to the DTSC's vapor intrusion guidance documents for the most appropriate protocols for evaluating vapor intrusion into buildings. According to the document entitled "*Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*" (DTSC, October 2011): "Air within a crawl space can be sampled as a method to evaluate vapor intrusion." However, DTSC further states: "To use contaminant concentrations in crawl space air for evaluating vapor intrusion, an attenuation factor of 1.0 should be used, which is consistent with USEPA guidance [*Draft Guidance for Evaluation the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)*, November 2002]. Thus, for evaluation purposes, the contaminant concentration in indoor air is assumed to be equal to the concentration in crawl space air."
- The two air samples were collected from the crawl space beneath the Engineering Office Building at the site; however the list of analytes was limited to benzene and toluene. Although the air samples were analyzed in accordance with EPA Method TO14 (a current standard), the analytical method reporting limit (MRL) for benzene used in the analysis of the air samples was significantly higher than the current California Human Health Screening Levels (CHHSLs) for benzene (the MRL of 3.19 micrograms per cubic meter [ug/m^3] is two orders of magnitude greater than the current benzene CHHSL of 0.14 ug/m^3). Thus the 1998 report conclusion that the levels present no measurable impact to occupants of the building is invalid based on DTSCs more recent understanding of benzene risk.
- The LTCP allows for the evaluation of the potential for vapor intrusion to indoor using three different methods. The first method allows a determination to be made based on site-specific conditions satisfying four different scenarios. The second method allows for a human health protectiveness determination to be made based on a site-specific risk assessment. The third method allows for the use of institutional or engineering controls to mitigate exposure to vapors.
    - ACEH's review of crawl space air data indicates that the site does not meet the requisite characteristics of Scenarios 1 through 4 of the vapor intrusion media specific criteria contained in the first method described above. According to the LTCP, when applying the criteria for Scenario 4 – Direct Measurement of Soil Gas Concentrations, the soil gas sample must be obtained beneath or adjacent to an existing building at a depth of at least

five feet below the bottom of the building foundation. However, as previously noted, the existing air data was collected from the crawl space of the building and therefore the soil gas concentration screening numbers presented in the policy are not applicable. Assuming an attenuation factor of 1.0 in accordance with the DTSC guidance, the crawl space vapor samples should be evaluated against the CHHSLs for indoor air for the constituents previously analyzed (0.14 ug/m^3 for benzene and 438 ug/m^3 for toluene), and per the LTCP, for ethylbenzene and naphthalene CHHSLs (1.6 ug/m^3 for ethylbenzene, and 0.120 ug/m^3 for naphthalene). ACEH notes that DTSC guidance and California Human Health-Based Screening Levels (CHHSLs) are fully integrated into the LTCP.

- An ASTM-RBCA (Risk Based Corrective Action) Tier-1 evaluation of risk to human health was prepared in 1998 in accordance with ASTM E1739-95e1 *Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*. The objective of the screening was to identify chemicals and exposure pathways that have a potential to cause adverse affects to human health. The analysis found that volatilization of benzene and toluene into enclosed spaces and volatilization of benzene into outdoor were the only chemical / exposure pathway combinations that have the potential to cause an unacceptable health impact. The screening was completed for benzene, toluene, ethylbenzene, and total xylenes; however, per the LTCP a screening for naphthalene was not conducted. Additionally, ASTM E1739-95e1 has been superseded by ASTM E1739-95(2010)e.1, and thus the Default Input Values to Site and Worker Characteristics and RBSLs used in the evaluation are obsolete due to the evolving understanding of vapor intrusion risks as acknowledged by DTSC document revisions.
- To evaluate the exposure pathway scenario that benzene or toluene vapors from the groundwater plume beneath the Engineering Office Building could rise and potentially impact the health of workers in the offices above, passive air sampling was performed. The crawl space was identified as the space in which vapors would collect immediately before permeating into the work space. However, based on the levels of toluene reported in the air samples it was concluded that toluene cannot be considered an impact upon office workers, and therefore a RBCA Tier 2 Assessment was not, and has not, been conducted.
- If a risk assessment is to be conducted to fill this apparent data gap, the LUFT Manual indicates that it should follow current DTSC guidelines. Current DTSC vapor intrusion guidance recommends use of the California version of USEPA's Johnson and Ettinger (J&E) model (USEPA, 2004a). DTSC created the California version of the USEPA Vapor Intrusion Model by including Cal/EPA OEHHA toxicity factors and California-specific building properties.

Media-Specific Criteria 3. Direct Contact and Outdoor Air Exposure. Release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if they meet any of the following:

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). The concentration limits for 0 to 5 feet bgs protect from ingestion of soil, dermal contact with soil, inhalation of volatile soil emissions and inhalation of particulate emissions, and the 5 to 10 feet bgs concentration limits protect from inhalation of volatile soil emissions. 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 are reasonably anticipated, the concentration limits for Utility Worker shall also be satisfied; or

b. Maximum concentrations of petroleum constituents in soil are less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health; or

c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that the concentrations of

petroleum constituents in soil will have no significant risk of adversely affecting human health.

The USTCF's *Case Closure Review Summary Report* indicates that the site meets Class 3a of the Direct Contact and Outdoor Air Exposure Media-Specific Criteria and states that maximum concentrations in soil are less than those in Table 1 for Commercial / Industrial and Utility Worker exposures. The Summary Report also states that naphthalene has not been analyzed at the site and concludes naphthalene concentrations are de minimus based on an analysis of naphthalene concentrations in gasoline. ACEH is in agreement with the USTCF naphthalene analysis; however, ACEH notes that the maximum concentrations for benzene cited in the *Case Closure Review Summary Report* are in error.

As noted above in previous sections of this document, ACEH's review found multiple sample locations documenting benzene and ethylbenzene concentrations above the LTCP screening levels for commercial / industrial and utility worker exposure concentrations including the following:

- 39 mg/kg benzene at 3 feet bgs in MW-5 (October 16, 2002); not <0.005 mg/kg at 4 feet (April 16, 2008) as reported in the USTCF's *Case Closure Review Summary Report*.
- 34 mg/kg benzene at 6 feet bgs in MW-6 (June 27, 2008); not 12 mg/kg at 7 feet bgs (April 16, 2008) as reported in the USTCF's *Case Closure Review Summary Report*.
- 130 mg/kg ethylbenzene at 3.5 feet bgs in SB-2 (August 9, 1993); not 0.01 mg/kg at 4 feet bgs (April 16, 2008) as reported in the USTCF's *Case Closure Review Summary Report*.
- 56 mg/kg ethylbenzene at 6 feet bgs in MW-6 (June 27, 2008) and 60 mg/kg ethylbenzene at 7 feet bgs in SB-10 (April 16, 2008).

Conclusions

ACEH is in disagreement that the site can currently be closed under the selected LTCP Criterias, notes multiple errors in the *Case Closure Review Summary Report* and *Summary of Basic Case Information (CSM)* sections (including multiple errors not directly mentioned in this response letter. At present a low-threat exposure to Groundwater, Vapor Intrusion to Indoor Air, and Direct Contact and Outdoor Air exposure criterions are not documented. As such the LTCP considers these exposures to be unprotective of human health and the environment.

To address these issues ACEH recommends additional groundwater sampling to verify continued contaminant trends in groundwater, determine groundwater concentrations in the abandoned sewer line and the POTW's ability to capture and handle the contaminants, investigate vapor risk using current DTSC protocols recommended and incorporated into the LTCP and LUFT Manual, and either conduct a site-specific risk assessment to address direct contact and outdoor air exposures, or otherwise manage direct contact exposures beneath the site.

Thank you for providing ACEH with the opportunity to comment on the subject site. Should you have any questions regarding the responses above, please contact Mark Detterman at (510) 567-6876 or send him an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Digitally signed by Dilan Roe
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Dilan Roe, P.E.
LOP Program Manager

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Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

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