

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD  
**ORDER WQ 2013-0074-UST**

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**In the Matter of Underground Storage Tank Case Closure  
Pursuant to Health and Safety Code Section 25296.40 and the Low-Threat  
Underground Storage Tank Case Closure Policy**

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**BY THE EXECUTIVE DIRECTOR<sup>1</sup>:**

By this order, the Executive Director directs closure of the underground storage tank (UST) case at the site listed below, pursuant to subdivision (a) of section 25296.40 of the Health and Safety Code.<sup>2</sup> The name of the petitioner, the site name, the site address, the Underground Storage Tank Cleanup Fund (Fund) claim number if applicable, and the lead agency name and case number are as follows:

**Mr. Lee Nelson  
Burgess Transportation  
20825 Currier Road, Walnut, California 91789  
Fund Claim No. 15629  
Los Angeles Regional Water Quality Control Board, Case No. R-20497**

**I. STATUTORY AND PROCEDURAL BACKGROUND**

Upon receipt of a petition from a UST owner, operator, or other responsible party, section 25296.40 authorizes the State Water Resources Control Board (State Water Board) to close or require closure of a UST case where an unauthorized release has occurred, if the State Water Board determines that corrective action at the site is in compliance with all of the requirements of subdivisions (a) and (b) of section 25296.10. The State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure

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<sup>1</sup> State Water Board Resolution No. 2012-0061 delegates to the Executive Director the authority to close or require the closure of any UST case if the case meets the criteria found in the State Water Board's Low-Threat Underground Storage Tank Case Closure Policy adopted by State Water Board Resolution No. 2012-0016.

<sup>2</sup> Unless otherwise noted, all references are to the California Health and Safety Code.

of a UST case. Closure of a UST case is appropriate where the corrective action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with: 1) Chapter 6.7 of division 20 of the Health and Safety Code and implementing regulations; 2) Any applicable waste discharge requirements or other orders issued pursuant to division 7 of the Water Code; 3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

State Water Board staff has completed a review of the UST case identified above, and recommends that this case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Summary has been prepared for the case identified above and the basis for determining compliance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closures (Low-Threat Closure Policy or Policy) are explained in the Case Closure Summary.

### **Low-Threat Closure Policy**

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low-Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low-threat to human health, safety, and the environment and are appropriate for closure under Health and Safety Code section 25296.10. The Policy provides that if a regulatory agency determines that a case meets the general and media-specific criteria of the Policy, then the regulatory agency shall notify responsible parties and other specified interested persons that the case is eligible for case closure. Unless the regulatory agency revises its determination based on comments received on the proposed case closure, the Policy provides that the agency shall issue a uniform closure letter as specified in Health and Safety Code section 25296.10. The uniform closure letter may only be issued after the expiration of the 60-day comment period, proper destruction or maintenance of monitoring wells or borings, and removal of waste associated with investigation and remediation of the site.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a uniform closure letter or a letter of commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied.

## II. FINDINGS

Based upon the UST Case Closure Summary prepared for the case attached hereto, the State Water Board finds that corrective action taken to address the unauthorized release of petroleum at the UST release site identified as:

**Mr. Lee Nelson**

**Burgess Transportation**

**20825 Currier Road, Walnut, California 91789**

**Fund Claim No. 15629**

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ensures protection of human health, safety, and the environment and is consistent with Chapter 6.7 of division 20 of the Health and Safety Code and implementing regulations, the Low-Threat Closure Policy and other water quality control policies and applicable water quality control plans.

Pursuant to the Low-Threat Closure Policy, notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60-day comment period has been provided to notified parties, and any comments received have been considered by the State Water Board in determining that the case should be closed.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Water Board (Regional Water Board) pursuant to division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to division 7 of the Water Code, or directives issued by a Local Oversight Program (LOP) agency for this case should be rescinded to the extent they are inconsistent with this Order.

## III. ORDER

**IT IS THEREFORE ORDERED** that:

- A. The UST case identified in Section II of this Order, meeting the general and media-specific criteria established in the Low-Threat Closure Policy, be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a uniform closure letter, the Petitioner is ordered to:

1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;

2. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and

3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in Section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.

- B. The tasks in subparagraphs (1) and (2) of Paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299, subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.
- C. Within 30 days of receipt of proper documentation from the Petitioner that requirements in subparagraphs (1) and (2) of Paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.
- D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to Paragraph (C), the Deputy Director of the Division of Water Quality shall issue a uniform closure letter consistent with Health and Safety Code section 25296.10, subdivision (g) and upload the uniform closure letter and UST Case Closure Review Summary Report to GeoTracker.
- E. As specified in Health and Safety Code section 25299.39.2, subdivision (a) (2), corrective action costs incurred after a recommendation of closure shall be limited to \$10,000 per year unless the State Water Board or its delegated representative agrees that corrective action in excess of that amount is necessary to meet closure requirements, or additional corrective actions are necessary pursuant to section 25296.10, subdivision (a) and (b). Pursuant to section 25299.57, subdivision (l) (1), and except in specified circumstances, all claims for reimbursement of corrective action costs

must be received by the Fund within 365 days of issuance of the uniform closure letter in order for the costs to be considered.

- F. Any Regional Water Board or LOP agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case identified in Section II is rescinded, but only to the extent the Regional Water Board order or LOP agency directive is inconsistent with this Order.

Thomas Howard  
Executive Director

8/19/13  
Date

State Water Resources Control Board

UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: Los Angeles Regional Water Quality Control Board	Address: 320 West 4th Street, Suite 200 Los Angeles, CA 90013
Agency Caseworker: Noman Chowdhury	Case No.: R-20497

Case Information

USTCF Claim No.: 15629	Global ID: T0603705309
Site Name: Burgess Transportation	Site Address: 20825 Currier Rd Walnut, CA 91789 (Site)
Petitioner: Lee Nelson	Address: Po Box 10067 Fullerton, CA 92838
USTCF Expenditures to Date: \$720,320	Number of Years Case Open: 18

URL: [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0603705309](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603705309)

Summary

The Low-Threat Underground Storage Tank 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 Site meets all of the required criteria of the policy. A summary evaluation of compliance with the policy is shown in **Attachment 1: Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Site Information**. Highlights of the Conceptual Site Model of the case follow:

The unauthorized release was discovered following the removal of four Underground Storage Tanks (USTs) in August of 1994. No known USTs remain at the site. Three remedial pilot studies were conducted and a full scale High Vacuum Dual Phase Extraction (HVDPE) was selected and implemented. Results of the HVDPE indicated that extraction technologies were ineffective due to lithology with low permeability resulting in limited contaminant and groundwater mobility in the subsurface. The soil and groundwater plumes are located within the Site boundaries and are well defined horizontally and vertically by samples identified below detection limits. Soil and groundwater analytical data demonstrate that residual contamination is stable and remains in a very localized area within 100 feet of the release.

The petroleum release is limited to the shallow soil and groundwater. The affected groundwater is not currently being used as a source of drinking water or for any other designated beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or for any other beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals and screens that are in deeper more protected aquifers. Remaining petroleum constituents are limited, stable and declining. Remedial actions have been implemented and further

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE OFFICER

remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the conceptual model. Any remaining petroleum constituents do not pose significant risk to human health, safety, or the environment.

### Rationale for Closure under the Policy

- General Criteria – Site **MEETS ALL EIGHT GENERAL CRITERIA** under the Policy.
- Groundwater Media-Specific Criteria. Site meets the criterion in **CLASS 5**. – Based on an analysis of Site-specific conditions, under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low-threat to human health and safety and to the environment and water quality objectives (WQOs) will be achieved within a reasonable period of time.
- Petroleum vapor Intrusion to Indoor Air –Site meets **CRITERIA (2) a. SCENARIO 4**. Site-specific conditions satisfy Scenario 4. Direct soil gas measurements oxygen data were collected and are less than or equal to those listed in the Scenario 4 Table.
- Direct Contact and Outdoor Air Exposure – Site meets **CRITERIA (3) a**. Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1. The estimated naphthalene concentrations in soil meet the thresholds in Table1 and the policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

### Objections to Closure

Los Angeles Regional Water Quality Control Board (Regional Water Board) staff objected to UST case closure because:

1. 0.29 feet of free product was observed on January 14, 2011.  
**RESPONSE:** Free product has been observed five times in eleven years and only twice has the thickness of the free product been identified greater than a sheen. Given that geology at the site is not conducive to extraction technologies, and the intermittent nature of the free product observances, further free product removal would not be practical.
2. Dissolved hydrocarbon concentrations in three of the groundwater monitoring wells have shown increasing trends.  
**RESPONSE:** Recently, dissolved petroleum hydrocarbons increased in the source area wells. The increase was likely a result of remobilization of petroleum hydrocarbons trapped in soil driven by the unusually high precipitation and the associated increased groundwater table observed during the winter of 2009/2010. Therefore, excluding the recent increase, dissolved hydrocarbon trends observed in source area wells appear to be stable/decreasing. The wells on the outer edge of the plume (non-detect ring) were unaffected by the recent increase indicating the plume laterally stable.
3. The dissolved hydrocarbon fluctuations are too large to identify a stable/decreasing trend.  
**RESPONSE:** The release was identified 18 years ago and the plume is ringed by non-detect monitoring wells therefore, the historic data for the outer wells indicates that the contaminant mass has expanded to its maximum extent where attenuation exceeds migration and is laterally stable. Given that the plume has been laterally stable, the very localized concentration fluctuations do not threaten human health and do not warrant further concern.

4. The Regional Water Board contends that the above information indicates the potential source contributing to the identified groundwater contamination has not been successfully removed.

**RESPONSE:** The primary source has been removed. No other sources are on the site.


Remediation utilizing extraction technologies has proven ineffective. The recommended remedial option included deep soil excavation (35 feet bgs) and groundwater extraction via 45 foot deep extensive subsurface drains. However, this option would require significant effort and cost and may compromise structures on the Site to remediate the plume. There are no significant human health, safety, or environment threats from this plume.

#### Recommendation for Closure

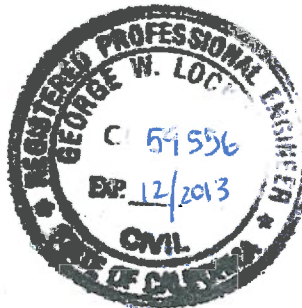
The corrective action performed at this Site ensures the protection of human health, safety, the environment and is consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations, applicable state policies for water quality control and the applicable water quality control plan, and case closure is recommended.

Prepared By:   
Matthew Cohen  
Engineering Geologist

4-15-2013  
Date

Reviewed By:   
George Lockwood, PE No. 59556  
Senior Water Resource Control Engineer

4/15/2013  
Date





**ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW**

The site complies with State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the site do not pose significant risk to human health, safety, or the environment.

The site complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.<sup>1</sup>

<p><b>Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations?</b>          The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST case closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this site?</b></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b>If so, was the corrective action performed consistent with any order?</b></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p><b><u>General Criteria</u></b>          General criteria that must be satisfied by all candidate sites:</p> <p><b>Is the unauthorized release located within the service area of a public water system?</b></p> <p><b>Does the unauthorized release consist only of petroleum?</b></p> <p><b>Has the unauthorized ("primary") release from the UST system been stopped?</b></p> <p><b>Has free product been removed to the maximum extent practicable?</b></p> <p><b>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

<sup>1</sup> Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

<p><b>Has secondary source been removed to the extent practicable?</b></p> <p><b>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</b></p> <p><b>Nuisance as defined by Water Code section 13050 does not exist at the site?</b></p> <p><b>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b><u>Media-Specific Criteria</u></b>        Candidate sites must satisfy all three of these media-specific criteria:</p> <p><b>1. Groundwater:</b>        To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives (WQOs) must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p><b>Is the contaminant plume that exceeds WQOs stable or decreasing in areal extent?</b></p> <p><b>Does the contaminant plume that exceeds WQOs meet all of the additional characteristics of one of the five classes of sites?</b>        If YES, check applicable class: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5</p> <p><b>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p><b>2. Petroleum Vapor Intrusion to Indoor Air:</b>        The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p><b>Is the site an active commercial petroleum fueling facility?</b>        Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p><b>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4?</b>        If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 4</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p>

<p><b>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</b></p> <p><b>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</b></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p><b>3. Direct Contact and Outdoor Air Exposure:</b>          The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p> <p><b>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 of the Policy for the specified depth below ground surface (bgs)?</b></p> <p><b>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</b></p> <p><b>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

**ATTACHMENT 2: SUMMARY OF BASIC INFORMATION (Conceptual Site Model)**

**Site Location/ History**

- The Site is located at 20825 Currier Road, Walnut. The Site is an operating Commercial trucking facility.
- The Site is bounded by commercial properties.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Primary Source of Release: UST system.
- Discovery Date: 1994.
- Release Type: Petroleum<sup>2</sup>.
- Twelve monitoring wells have been installed.
- Free Product: Periodically reported (five times in eleven years) and has only been thicker than a sheen twice.

**Table A: USTs**

Tank No.	Size	Contents	Status	Date
1	12,000	Diesel	Removed	1994
2	12,000	Diesel	Removed	1994
3	10,000	Gasoline	Removed	1994
4	280	Waste Oil	Removed	1994

**Receptors**

- Groundwater Basin: San Gabriel Valley.
- Groundwater Beneficial Uses: Municipal (MUN), Industrial (IND), Industrial Process Supply (PROC), and Agricultural Supply (AGR).
- Designated Land Use: Industrial.
- Public Water System: Walnut Valley Water District.
- Distance to Nearest Supply Wells: Greater than 1,000 feet.
- Distance to Nearest Surface Waters: Concrete lined San Jose Creek ~ 400 feet northwest.

**Geology/ Hydrogeology**

- Average Groundwater Depth: ~23 feet.
- Minimum Groundwater Depth: ~15.5 feet.
- Groundwater Flow Direction: Southwesterly.
- Geology: Low permeability silts and clays to approximately 19 ft. bgs over siltstone/sandstone bedrock.
- Hydrology: Regional groundwater flow is largely controlled by engineered recharge along the San Gabriel, the Rio Hondo, and the Santa Ana Rivers, and by ground water pumping from the wells in the area.

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<sup>2</sup> "Petroleum" means crude oil, or any fraction thereof, which is liquid at standard conditions of temperature and pressure, which means at 60 degrees Fahrenheit and 14.7 pounds per square inch absolute.  
(Health & Safety Code, § 25299.2)

**Corrective Actions**

- 1994 August – Removal of four USTs and adjacent soil.
- 2003 May – Soil vapor extraction / air sparging pilot study.
- 2004 June/July– Soil vapor extraction pilot study.
- 2005 June/July – High vacuum dual phase extraction (HVDPE) pilot study.
- 2006 July through 2007 February – Full Scale HVDPE.

**Table B: Concentrations of Petroleum Constituents in Soil**

Constituent	Maximum 0-5 ft. bgs (mg/kg)	Maximum 5-10 ft. bgs (mg/kg)
Benzene	<0.005	<0.005
Ethylbenzene	<0.005	<0.005
Naphthalene	NA	NA
PAHs	NA	NA

NA = Not analyzed

PAH = Poly-aromatic hydrocarbons as benzo(a)pyrene toxicity equivalent

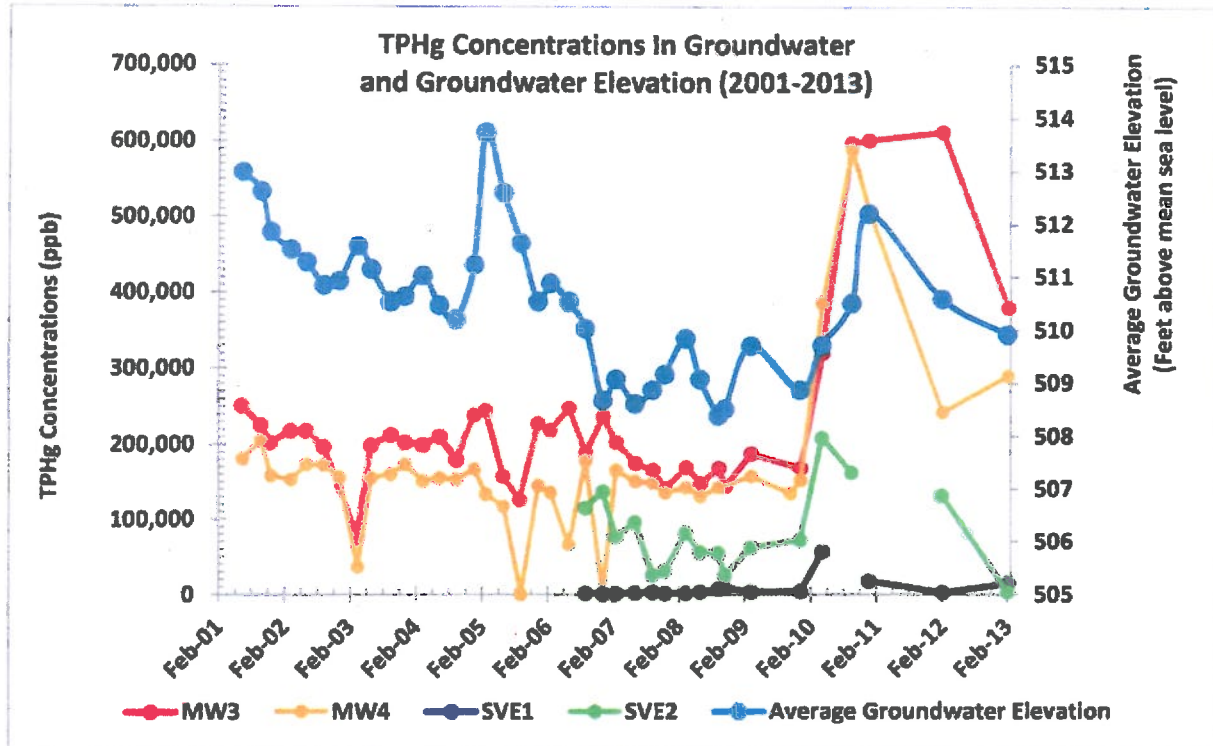
**Table C: Concentrations of Petroleum Constituents of Concern in Groundwater**

Sample	Sample Date	TPHg (ppb)	Benzene (ppb)	Toluene (ppb)	Ethylbenzene (ppb)	Xylenes (ppb)	MTBE (ppb)
MW1	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
MW2	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
MW3	2/27/2013	379,961	55,672	71,785	3,466	22,737	<50
MW4	2/27/2013	289,683	41,643	66,605	3,569	16,375	<50
MW5	2/27/2012	<100	<0.5	<0.5	<0.5	<0.5	<1.0
MW6	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
MW7	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
MW8	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
MW9	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
MW10	2/27/2013	<100	<0.5	<0.5	<0.5	<0.5	<1
SVE1	2/27/2013	14,467	1,569	87	99	57	<5
SVE2	2/27/2013	3,182	1,111	8.3	<0.5	74	<1
WQOs	-	-	1	150	300	1750	5

WQOs - Water Quality Objectives

\* California Notification Level

**Groundwater Trends:**

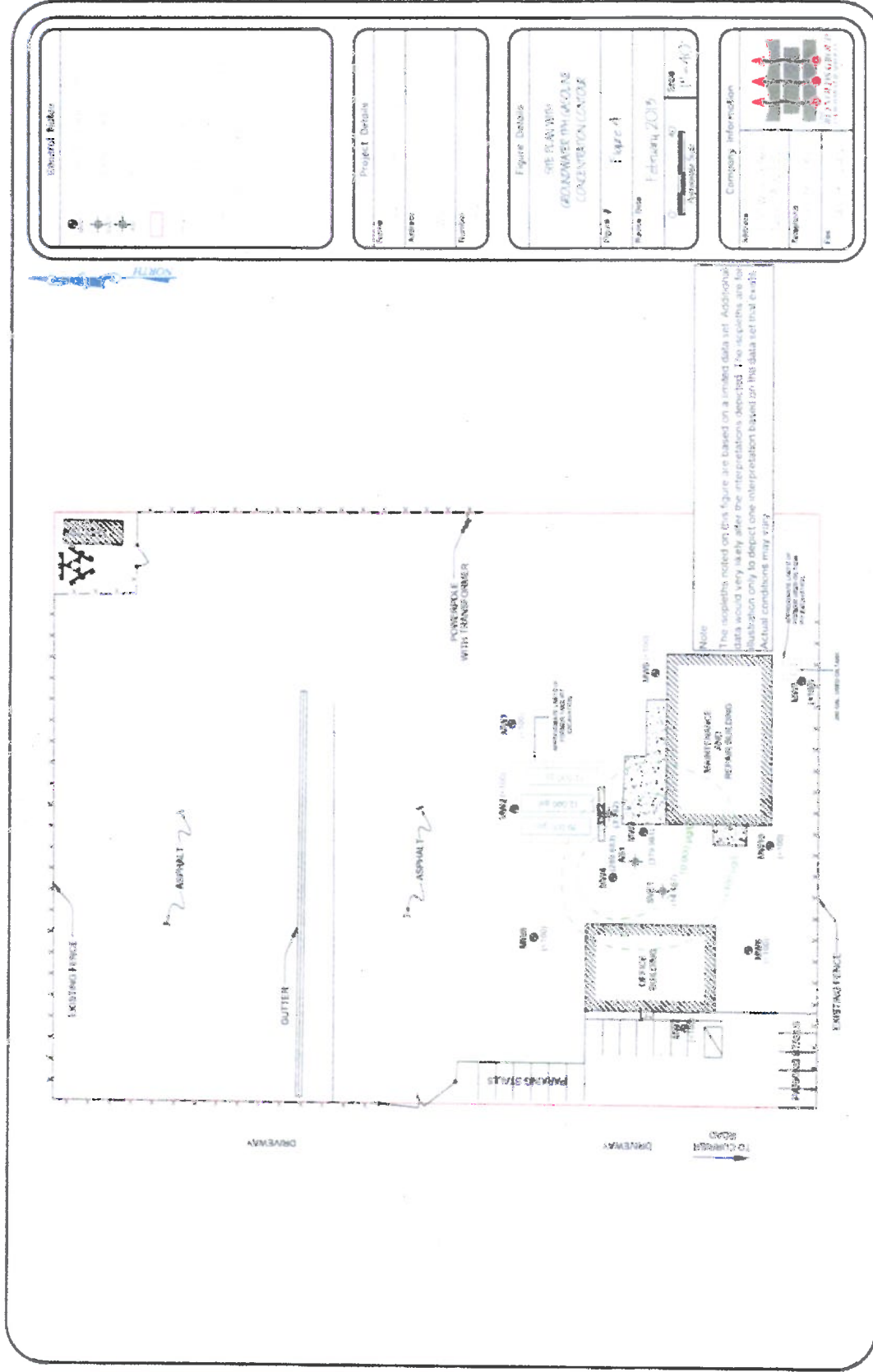


**Evaluation of Risk Criteria**

- Maximum Petroleum Constituent Plume Length above WQOs: TPHg plume is less than 100 feet in length from the source.
- Petroleum Constituent Plume Determined Stable or Decreasing: Yes.
- Soil/Groundwater Sampled for MTBE: Yes, see Table C above.
- Residual Petroleum Constituents Pose Significant Risk to the Environment: No.
- Residual Petroleum Constituents Pose Significant Vapor Intrusion Risk to Human Health: No – soil vapor samples demonstrate that there is no significant risk form vapor intrusion.
- Residual Petroleum Constituents Pose a Nuisance<sup>3</sup> at the Site: No.
- Residual Petroleum Constituents in Soil Pose Significant Risk of Adversely Affecting Human Health: No – the site meets the Low-Threat Closure Policy Criteria.
- Residual Petroleum Constituents Pose Significant Direct Contact and Outdoor Air Exposure to Human Health: No – There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2% benzene and 0.25% naphthalene. Therefore, benzene concentrations can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Table 1 of the policy. Therefore, estimated naphthalene concentrations meet the thresholds in Table1 of the policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

<sup>3</sup> Nuisance as defined in California Water Code, section 13050, subdivision (m).

**Burgess Transportation**  
**20825 Currier Road, Walnut, Los Angeles County**



<b>Site Plan</b> 20825 Currier Road Walnut, CA 91790	
<b>Project Details</b> Name: _____ Address: _____ Number: _____	<b>Figure Details</b> SHEET NO. 10 CONVENTION CENTER DATE: February 2015 SCALE: 1" = 40'
<b>Company Information</b> Name: _____ Address: _____ Phone: _____	