STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2014-0092 – UST

In the Matter of Underground Storage Tank Case Closure

Pursuant to Health and Safety Code Section 25296.10 and the Low Threat Underground Storage Tank Case Closure Policy

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BY THE EXECUTIVE DIRECTOR[1]:

By this order, the Executive Director directs closure of the underground storage tank (UST) case at the site listed below, pursuant to section 25296.10 of the Health and Safety Code[2]. The name of the Underground Storage Tank Cleanup Fund (Fund) claimant, the site name, the site address, the Fund claim number, the lead agency, and case number are as follows:

Ravi and Mandeep Sekhon Zaroon, Inc.
Foothill Mini Mart
6600 Foothill, Oakland
Fund Claim No. 14095

Alameda County Environmental Health Department
Agency Case Number 01-2481

I. STATUTORY AND PROCEDURAL BACKGROUND

Upon review of a UST case, the State Water Resources Control Board (State Water Board) may close of require closure of a UST case where 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

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[1] 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.

[2] Unless otherwise noted, all references are to the Health and Safety Code.

The State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure 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 Review Summary Report has been prepared for the case identified above and the bases 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 Review Summary Report.

A. 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 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 Review Summary Report 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:

Claim No. 14095

Foothill Mini Mart

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.

The unauthorized release from the UST consisted only of petroleum. This order directs closure for the petroleum UST case at the site.[3]

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 Board in determining that the case should be closed.

Pursuant to section 21080.5 of the Public Resources Code, environmental impacts associated with the adoption of this Order were analyzed in the substitute environmental document (SED) the State Water Board approved on May 1, 2012. The SED concludes that all environmental effects of adopting and implementing the Low threat Closure Policy are less than significant, and environmental impacts as a result of complying with the Policy are no different from the impacts that are reasonably foreseen as a result of the Policy itself. A Notice of Decision was filed August 17, 2012. No new environmental impacts or any additional reasonably foreseeable impacts beyond those that were not addressed in the SED will result from adopting this Order.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control 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 agency for this case should be rescinded to the extent they are inconsistent with this Order.

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[3] This order addresses only the petroleum UST case for the site. This order does not affect an existing order or directive requiring corrective action for non-petroleum contamination, if non-petroleum contamination is present.

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 Fund claimant 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 on page 1 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 Fund claimant 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 Financial Assistance shall issue a closure letter consistent with Health and Safety Code section 25296.10,

subdivision (g) and upload the closure letter and UST Case Closure Review Summary Report to GeoTracker.

E. 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 Local Oversight Program 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 Local Oversight Program Agency directive is inconsistent with this Order.

Executive Director

6/6/14
Date

State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Alameda County Environmental Health Department (LOP)	Address: 1131 Harbor Bay Parkway Alameda, CA 94502
Agency Caseworker: Keith Nowell	Case No.: R00000175

Case Information

USTCF Claim No.: 14095	GeoTracker Global ID: T0600102286
Site Name: Foothill Mini Mart	Site Address: 6600 Foothill Boulevard, Oakland, CA 94605
Responsible Party 1: Ravi Sekhon & Mandeep Sekhon	Address: 21696 Knuppe Place, Castro Valley, CA 94552;
Responsible Party 2: Zaroon, Inc. Att: Abdul Ghaffar	Address: 40092 Davis Street, Freemont, CA 94538-2605
USTCF Expenditures to Date: $418,488	Number of Years Case Open: 15

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600102286

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 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 Case Information (Conceptual Site Model).** Highlights of the case follow:

This case is an active commercial petroleum fueling facility. An unauthorized release was reported in December 1998. Following the release, one 8,000-gallon UST was removed from the Site. In 1998 and an unknown quantity of soil and groundwater was removed and disposed during the UST removal activities and removal of free product. During the summer of 2011 the injection of ozone and peroxide were tested at the site. A separate parallel plume is originating from an unregulated property next door to the east. A total of 13 groundwater monitoring wells have been installed and monitored since 2001. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents at subject site monitoring wells.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no supply wells regulated by the California Department of Public Health or surface water bodies within 1,000 feet of the defined plume boundary. No other water supply wells have been identified within 1,000 feet of the defined plume boundary in files reviewed. Water is provided to water users near the Site by the East Bay Municipal Utility District. The affected groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the foreseeable future.

Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context of the site setting. Remaining petroleum hydrocarbon constituents are limited, stable and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 µg/L (micrograms per Liter), and the dissolved concentration of MTBE is less than 1,000 µg/L. A second petroleum hydrocarbon plume is originating from an unregulated property next door to the east based on analytical data, historical groundwater flow directions, and aerial photography review.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: 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 found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. The Site is paved and accidental access to site soils is prevented. As an active fueling facility, any construction worker working at the Site will be prepared for exposure in their normal daily work.

Objections to Closure and Responses

The Alameda County Department of Environmental Health disagrees with the closure of the Site, (phone conversation of April 19, 2013), stating the plume is not defined, and additional corrective action is required.
RESPONSE: Review of the existing groundwater data demonstrates that the plume is defined using the existing groundwater well network. Additional corrective action is not necessary.

Determination

Based on the review performed in accordance with Health & Safety Code Section 25299.39.2 subdivision (a), the Fund Manager has determined that closure of the case is appropriate.

Recommendation for Closure
Based on available information, residual petroleum hydrocarbons at the Site do not pose a significant risk to human health, safety, or the environment, and the case meets the requirements of the Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board is conducting public notification as required by the Policy. Alameda County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock — 10/3/13

Lisa Babcock, P.G. 3939, C.E.G. 1235 — **Date**

Prepared by: Abdul Karim Yusufzai

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

The case complies with the 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 case complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.[1]

Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? 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 site 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.	☒ Yes ☐ No
Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this case?	☐ Yes ☒ No
If so, was the corrective action performed consistent with any order?	☐ Yes ☐ No ☒ NA
General Criteria General criteria that must be satisfied by all candidate sites:	
Is the unauthorized release located within the service area of a public water system?	☒ Yes ☐ No
Does the unauthorized release consist only of petroleum?	☒ Yes ☐ No
Has the unauthorized ("primary") release from the UST system been stopped?	☒ Yes ☐ No
Has free product been removed to the maximum extent practicable?	☒ Yes ☐ No ☐ NA
Has a conceptual site model that assesses the nature, extent, and mobility	☒ Yes ☐ No

[1] Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.
http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

of the release been developed?	
Has secondary source been removed to the extent practicable?	☒ Yes ☐ No
Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?	☒ Yes ☐ No
Nuisance as defined by Water Code section 13050 does not exist at the Site?	☒ Yes ☐ No
Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?	☐ Yes ☒ No
<u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria: **1. Groundwater:** To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:	
Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?	☒ Yes ☐ No ☐ NA
Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?	☒ Yes ☐ No ☐ NA
If YES, check applicable class: ☐ **1** ☒ **2** ☐ **3** ☐ **4** ☐ **5** **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?**	☐ Yes ☐ No ☒ NA
2. Petroleum Vapor Intrusion to Indoor Air: 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.	
Is the Site an active commercial petroleum fueling facility? 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.	☒ Yes ☐ No
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?	☐Yes ☐ No ☒ NA

If YES, check applicable scenarios: ☐ **1** ☐ **2** ☐ **3** ☐ **4**	
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?	☐ Yes ☐ No ☒ NA
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?	☐ Yes ☐ No ☒ NA
3. Direct Contact and Outdoor Air Exposure: 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).	
a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?	☐ Yes ☐ No ☒ NA
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?	☒ Yes ☐ No ☐ NA
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?	☐ Yes ☐ No ☒ NA

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

Site Location/History

- The Site is an active gasoline service station located at 6600 Foothill Boulevard, Oakland, California. The Site is a corner lot bounded on south-southeast by the Foothill Boulevard and on the west and southwest by Havenscourt Boulevard (Figure 1). To the east and on the opposite side of Foothill Boulevard, south of the Site, there are vacant lots formerly used as gas stations.
- The Site is located in an area with mixed commercial and residential uses, and has been a retail gas station since 1959.
- A second parallel plume appears to be associated with an unregulated property next door to the east. This parcel appears to be a former service station that is not documented in GeoTracker or being actively regulated.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: December 1998.
- Status of Release: USTs
- Free Product: None reported.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	8,000	Gasoline	Removed	December 1998
2	10,000	Gasoline	Active	Current
3	10,000	Gasoline	Active	Current

Receptors

- GW Basin: Santa Clara Valley – East Bay Plain.
- Beneficial Uses: The San Francisco Regional Water Quality Control Board (Regional Water Board) Basin Plan Lists: Municipal and Domestic Supply
- Land Use Designation: A review of aerial photography indicates the Site is located in a commercial and residential land use.
- Public Water System: East Bay Municipal Utility District.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by the California Department of Public Health within 1,000 feet of the defined plume boundary. No other water supply wells were identified within 1,000 feet of the defined plume boundary in the files reviewed.
- Distance to Nearest Surface Water: There is no identified surface water within 1,000 feet of the defined plume boundary.

Geology/Hydrogeology

- Stratigraphy: Soil conditions beneath the Site consist of heterogeneous mixture of fine grained soils (silt/clay mixtures) and coarser grained soils (silty sand, sand, clayey gravel, sandy gravel, and gravel) from surface grade to approximately 50 feet bgs.
- Maximum Sample Depth: 50 feet below ground surface (bgs).
- Minimum Groundwater Depth: 4.26 feet bgs at monitoring well MW-6.
- Maximum Groundwater Depth: 40.48 feet bgs at monitoring well MW-12B.

- Current Average Depth to Groundwater: Approximately 7 feet bgs.
- Saturated Zones(s) Studied: Approximately 10-40 feet bgs.
- Appropriate Screen Interval: Yes.
- Groundwater Flow Direction: Southwest a 0.03 ft/ft.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (1/2/2013)
MW-1	June 2001	10-25	6.15
MW-2	June 2001	10-25	6.23
MW-3	June 2001	10-25	8.47
MW-4	June 2002	7.5-20	4.64
MW-5	June 2002	7.5-20	6.24
MW-5B	June 2002	35-45	11.01
MW-6	June 2002	7.5-20	4.26
MW-6B	September 2009	33-50	39.22
MW-7	September 2009	9-25	8.46
MW-10	September 2009	15-25	9.16
MW-11	September 2009	10-25	8.41
MW-12A	September 2009	10-25	6.71
MW-12B	September 2009	33-43	39.76
MW-13A	September 2009	5-25	4.81

NM: Not measured

Remediation Summary

- Free Product: Sheen was observed in the tank pit during the 8,000-gallon UST removal. No sheen has been reported since 1998.
- Soil Excavation: An unknown amount of soil was excavated, characterized and transported to the Vasco Road landfill after UST removal activities in 1998.
- In-Situ Soil Remediation: None reported.
- Groundwater Remediation: An unknown amount of water was pumped from the UST excavation in 1998; this water was treated and released to the local storm sewer under permit by the East Bay Municipal Utility District. In May and June 2011, ISCO pilot test was performed by injecting ozone and hydrogen peroxide in the shallow saturated interval.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs [mg/kg and (date)]	Maximum 5-10 feet bgs [mg/kg and (date)]
Benzene	NA	0.025 (2009)
Ethylbenzene	NA	<0.005 (4/6/2011)
Naphthalene	NA	NA
PAHs	NA	NA

NA: Not Analyzed, Not Applicable or Data Not Available
mg/kg: Milligrams per kilogram, parts per million
<: Not detected at or above stated reporting limit
PAHs: Polycyclic aromatic hydrocarbons

Most Recent Concentrations of Petroleum Constituents in Groundwater

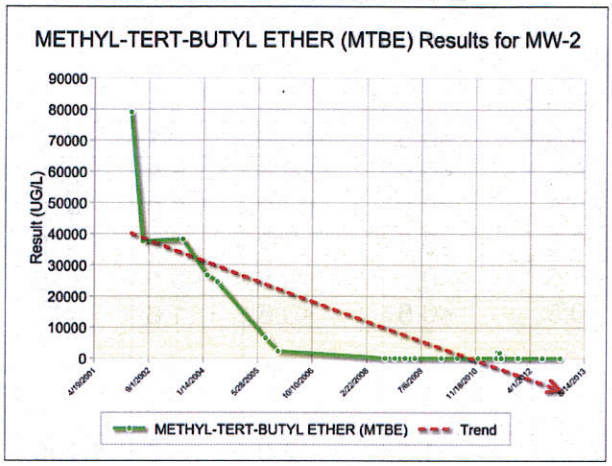
Sample	Sample Date	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)
Foothill Mini Mart Wells								
MW-1	01/02/2013	<50	<0.5	<0.5	<0.5	0.58	**11**	<10
MW-2	01/02/2013	150	<0.5	<0.5	<0.5	<0.5	**5.9**	950
MW-3	01/02/2013	<100	<0.5	<0.5	<0.5	0.52	3.0	440
MW-7	01/02/2013	<50	<0.5	<0.5	<0.5	1.2	**5.0**	<10
MW-10	01/02/2013	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<10
MW-11	01/02/2013	<50	<0.5	<0.5	<0.5	<0.5	1.6	<10
Parallel Plume Site Wells								
MW-4*	01/02/2013	1,200	<0.5	0.51	1.5	3.0	2	**1,200**
MW-5*	01/02/2013	<200	<1.0	<1.0	<1.0	1.3	3.0	**3,900**
MW-5B*	01/02/2013	<50	<0.5	<0.5	<0.5	1.4	**22**	<10
MW-6*	01/02/2013	3,500	**61**	<2.5	29	32.6	**360**	**1,300**
MW-6B*	01/02/2013	<50	<0.5	<0.5	<0.5	0.65	<0.5	<10
MW-12A*	01/02/2013	72	<0.5	<0.5	<0.5	0.69	**140**	<10
MW-12B*	01/02/2013	<50	<0.5	<0.5	<0.5	1.2	**5.0**	<10
MW-13A*	01/02/2013	970	<1.0	<1.0	<1.0	0.89	3.7	26
WQOs	--	--	**1**	**150**	**300**	**1,750**	**5**[a]	**1,200**[b]

NA: Not Analyzed, Not Applicable or Data Not Available
µg/L: Micrograms per liter, parts per billion
<: Not detected at or above stated reporting limit
TPHg: Total petroleum hydrocarbons as gasoline
TPHd: Total petroleum hydrocarbons as diesel
MTBE: Methyl tert-butyl ether
TBA: Tert-butyl alcohol
WQOs: Water Quality Objectives, San Francisco Regional Water Quality Control Board (Region Water Board) Basin Plan.
--: Regional Water Board Basin Plan does not have a numeric water quality objective for TPHg
*: Wells related to the up/side gradient parallel plume from adjacent property.
a.: Secondary maximum contaminant level (MCL)
b.: California Department of Public Health, Response Level

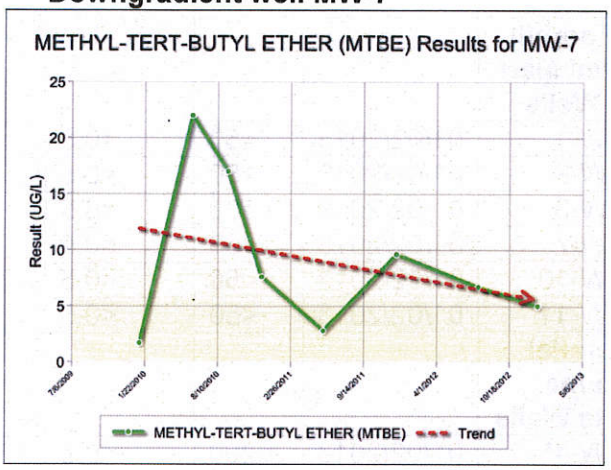
Groundwater Trends

- There are 12 years of irregular groundwater monitoring data for this case. MTBE trends are shown below.

Onsite source area well MW-2



Downgradient well MW-7

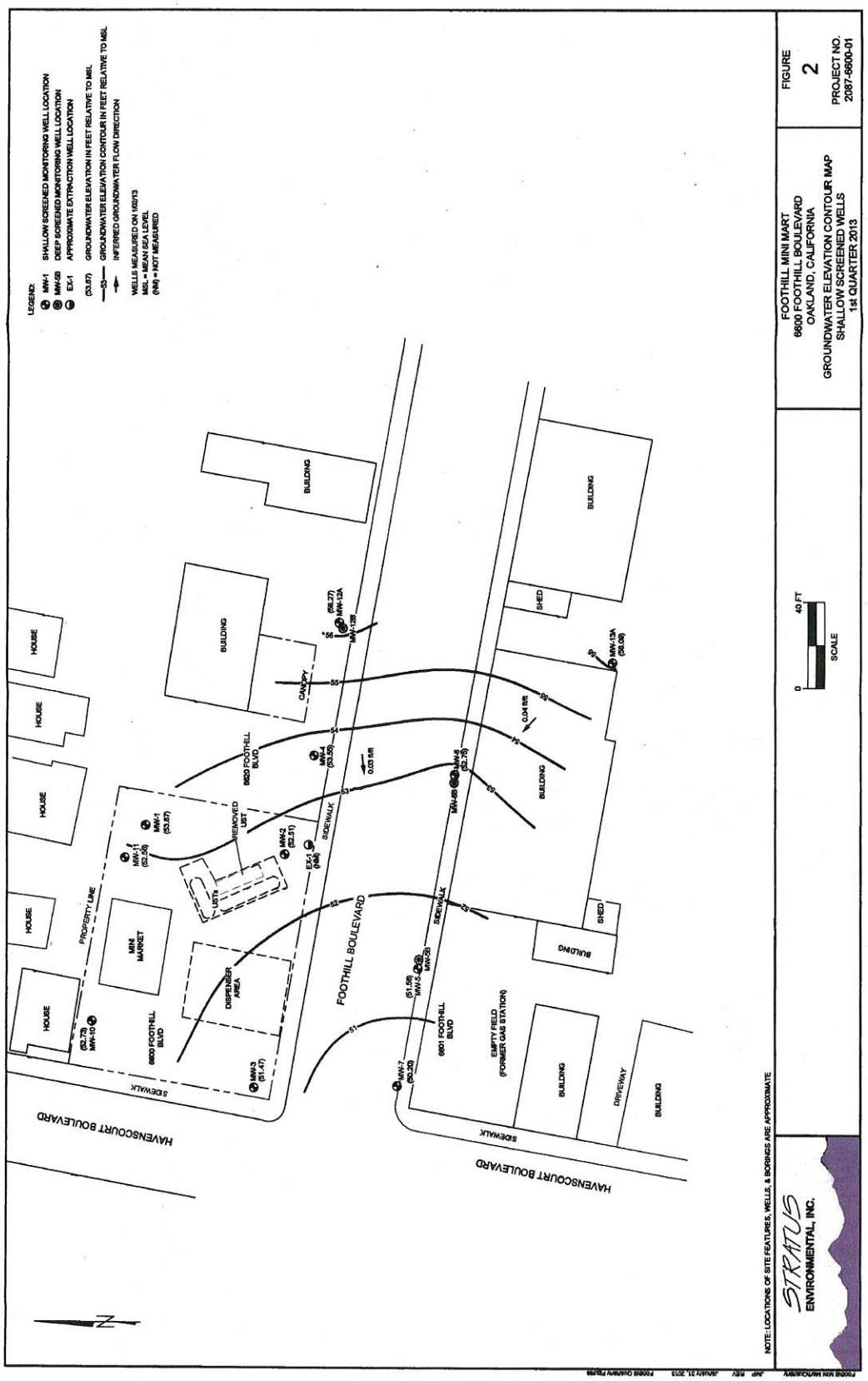


Evaluation of Current Risk

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for methyl tert-butyl ether (MTBE): Yes, see table above.
- Oxygen Concentrations in Soil Vapor: None reported.
- Plume Length: <250 feet long.
- Plume Stable or Decreasing: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 µg/L, and the dissolved concentration of MTBE is less than 1,000 µg/L. A second petroleum hydrocarbon plume is originating from an unregulated property next door to the east based on analytical data, historical groundwater flow directions, and aerial photography review.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 3b. A professional assessment of site-specific risk from exposure shows that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health. Furthermore, the Site is paved and accidental access to site soils is prevented. As an active gas station, any construction worker working at the Site will be prepared for exposure in their normal daily work.

Foothill Mini Mart
6600 Foothill, Oakland, CA 94605
Claim No. 14095

September 2013



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