STATE OF CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OCTOBER 19, 2007

ITEM NUMBER:

8

SUBJECT:

Low Threat and General Discharge Cases

DISCUSSION

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS (WDR's) for DISCHARGES TO LAND WITH LOW THREAT TO WATER QUALITY

Installation Of Potable Water Supply Test Well Adjacent To Clear Creek, Bureau Of Land Management – Hollister Field Office, San Benito County, [Cecile Demartini 805/542-4782]

Water Board staff enrolled the Bureau of Land Management - Hollister Field Office (BLM-Hollister) potable water supply test well under Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality (Low Threat General Permit) Order No. 2003-0003-DWQ on August 10, 2007. The test well will determine whether sufficient groundwater supply exists to supply potable water to a proposed Clear Creek Management Area asbestos decontamination facility. Groundwater extraction will occur from the Hernandez Valley Groundwater Basin aquifer. Depth to groundwater is expected to be first encountered at approximately 400 to 450 feet below grade surface (bgs). During drilling operations, the BLM-Hollister expects a maximum groundwater extraction flow rate of 600 to 800 gallons per day (GPD) for a period of 10 days. The BLM-Hollister will install in the project area an unlined settling sump (12'w x 5'd x 70'l) capable of containing approximately 40,000 gallons of mud/water mix. The unlined settling sump will be more than 200 feet away from the edge of Clear Creek. BLM-Hollister will cease pumping to the sump when the level of mud/water mix has reached the two-foot freeboard limit. They will provide portable water tanks to the site if additional disposal capacity is required. The BLM-Hollister will install a shallow trench approximately 2-feet deep by 3-feet wide between the potable water supply test well and the unlined settling sump to properly direct drilling fluids and well development water to the sump. The potable water supply test well project will not use chemicals during the installation and development of the water supply test well. The test well and sump area are approximately 200 feet away from Clear Creek. Discharge of wastewater shall cease upon Clear Creek surface waters coming within 75 feet of the project area or unlined settling sump. Discharged wastewater shall not cause ponding, threaten to enter surface waters, nor be discharged to areas not described in the submitted Notice of Intent application. The BLM-Hollister will test the well installation purge and development wastewater for various constituents including total dissolved solids, sodium, chloride, nitrates, pH, alkalinity, asbestos, and various other ion concentrations. The installation of the test well is scheduled to run for approximately 10 days.

The BLM-Hollister will acquire appropriate permits and meet additional requirements as directed from the San Benito County Water District and the California Department of Public Health if they determine the test well capable of being operated as a potable water supply well.

Enrollment under the Low Threat General Permit requires the BLM-Hollister and its authorized project representatives to comply with the modified Monitoring and Reporting Program for Order No. 2003-0003-DWQ and the Discharge Monitoring Plan as submitted by the BLM-Hollister with the Notice of Intent. The BLM-Hollister will submit a start-up report to the Water Board 15 days after receipt of laboratory results and final report to the Water Board 45 days after termination of the one-time discharge.

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR DISCHARGE OF BIOSOLIDS, ORDER 2004-0012-DWQ

Nipomo CSD Wastewater Facilities, San Luis Obispo County [Sorrel Marks 805/549-3695]

On August 15, 2007, Nipomo Community Services District (CSD) submitted a Notice of Intent (NOI) to comply with General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities (Order No. 2004-0012-DWQ), and associated fee. Nipomo CSD plans to land-apply biosolids on the southwesterly 10 acres of the Southland Wastewater Facility. Biosolids to be discharged include up to 450 dry tons per year of domestic/municipal wastewater residues treated at the CSD's Blacklake and Southland Wastewater Facilities.

The proposed biosolids discharge meets criteria specified in the Statewide general order. Enrollment under General Order No. 2004-0012-DWQ requires the District to implement ongoing monitoring and reporting to ensure continued compliance with requirements. Staff enrolled the discharge under Order No. 2004-0012-DWQ on September 24, 2007.

CORRECTIVE ACTION PLAN APPROVALS

Moss Landing Commercial Park (Former National Refractories & Minerals Corp.), Highway 1, Moss Landing, Monterey County [David Schwartzbart (805) 542-4643]

Moss Landing Commercial Park (former National Refractories and Minerals Inc.) is an industrial facility southeast of the intersection of Dolan Road and Highway One in Moss Landing, California. Subsurface investigation over about the last five years reveals hexavalent chromium (among other contaminants) present in groundwater under the facility at up to hundreds of parts per billion (ppb). Drinking water standards, among others, apply to that groundwater. No formal California drinking water standard has yet been promulgated for hexavalent chromium, but a California drinking water standard for less toxic forms of chromium is 50 ppb. A 0.2 ppb hexavalent chromium standard is being considered as a goal that might eventually form a basis for a drinking water standard.

No formal Water Board order has been adopted against Moss Landing Commercial Park (MLCP) largely because they have voluntarily been investigating and monitoring site groundwater contaminant sources and plumes since their purchase of the property in December 2003. In 2006, MLCP conducted a successful pilot test of the remediation technology for groundwater hexavalent chromium that is now approved for full scale implementation.

MLCP is approved to remediate groundwater hexavalent chromium by injecting food grade sodium lactate and an oxygen scavenger into groundwater. The injected food source is intended to promote growth of naturally occurring anaerobic bacteria in groundwater to reduce,

possibly precipitate and possibly metabolize hexavalent chromium. Results of the 2006 pilot test indicated this technology significantly reduced hexavalent and total chromium concentrations in groundwater.

Synthetic organic chemicals are also present in groundwater. Though the approved technology is not intended to treat the organic chemicals, the chemically reducing environment created by the technology might also degrade some of the organics. Sitewide and injection-specific groundwater monitoring will continue during and after injection to monitor injection effects and overall groundwater parameters and contaminant concentrations.

On June 1, 2007, public notice of the proposed remediation was issued to owners of land within 1,000 feet of the project and other interested parties, with a request for comments to be submitted by July 2, 2007. No comments were received. On July 27, 2007, the Executive Officer approved Moss Landing Commercial Park to remediate groundwater hexavalent chromium by lactate injection into groundwater, expected to occur in late September 2007.

Former Norvell Bass Dry Cleaners, 1015 De La Vina, Santa Barbara, Santa Barbara County [Thea Tryon 805/542-4776]

The former Norvell-Bass Dry Cleaners is located at 1015 De La Vina Street in Santa Barbara, on a 1.2-acre commercial lot. The site is currently configured and used as a strip shopping center that includes a restaurant, retail stores, and parking areas (see attached map, Figure 6).

In 1990, the responsible parties installed the first site monitoring wells. The primary contaminant detected in soil and groundwater is tetrachloroethene (PCE). The PCE contamination in soil and groundwater likely occurred from historical spills of dry cleaning solvents to the parking lot in front of the former dry cleaner building. Occupants occasionally pumped water (containing the dry cleaning chemicals) onto the parking lot to prevent flooding from a backed up sewer line inside the building. Additionally, there were spills from delivering PCE to the dry cleaner in the parking lot in front of the former dry cleaning building.

The responsible parties have monitored groundwater, soil, and soil vapor for chlorinated solvents since 1990. In January 2005, the Central Coast Water Board issued Cleanup and Abatement Order No. R3-2005-0033, which requires the responsible parties to cleanup soil and groundwater at and near the site.

On April 25, 2007, DBN Carrillo LLC (DBN) submitted a corrective action plan for removal of PCE-impacted soil and groundwater at the former Norvell-Bass Cleaning facility. DBN plans to redevelop the 1.2-acre commercial lot into a sub-grade parking structure, ground floor commercial space and multi-story residential spaces above the ground floor. DBN will excavate the entire site to approximately 25 feet below grade to build the below-ground parking structure. The environmental excavation contractor will profile and transport the excavated soils to an appropriate disposal facility. Additionally, DBN's consultant will inject a food-grade solution into the groundwater to enhance bioremediation of PCE-impacted groundwater beneath the site.

The site is underlain by a complex series of alluvial soils comprised of mixtures of clay, silt, sand, and gravel, therefore, remediation of PCE in soil using in-situ remediation technologies is very difficult. It is Central Coast Water Board staff's opinion that excavation of the soils is the best available technology for removing the impacted soil beneath and downgradient of the former Norvell-Bass Dry Cleaning facility. Therefore, the proposed redevelopment of this commercial lot

provides a unique opportunity to remove PCE-impacted soil to improve and perhaps restore the groundwater quality beneath and downgradient of the former dry cleaning site.

On May 3, 2007, Central Coast Water Board staff issued a public notice to all landowners and residents/occupants impacted or likely impacted by groundwater contamination within a 500-foot radius of the former Norvell-Bass Dry Cleaner site. The public notice described the site history and provided a summary of the proposed cleanup approach. Central Coast Water Board staff did not receive comments on the proposed cleanup plan within the 30-day comment period. However, several property owners requested that the Central Coast Water Board add them to the interested parties list so that they may receive copies of any correspondence regarding this site in the future.

On July 25, 2007, Central Coast Water Board staff concurred with DBN's proposed corrective action plan. DBN anticipates beginning demolition activities in the fourth quarter of 2007.

Attachment 1: Site Map

STAFF CLOSED CASES

City of Santa Barbara Parking Lot #2, 914 Chapala Street, Santa Barbara, Santa Barbara County [Thea Tryon, (805) 542-4776]

Prior to 1969, the Santa Barbara parking lot #2 location included occupants such as automobile-related services, drapery and upholstery shop, a cabinet shop, an oil supplier, and the California Theatre. The City of Santa Barbara demolished the buildings in 1969 and the site is currently a multi-story paved parking lot. In 1987, the City of Santa Barbara conducted a site assessment to evaluate subsurface soil and groundwater conditions prior to construction of a new multi-story parking lot. The City of Santa Barbara's consultant installed four soil borings and the consultant converted three soil borings into groundwater monitoring wells (B1, C1, and D1). The City of Santa Barbara's site assessment report indicated the presence of low concentrations of fuel hydrocarbons in soil and chlorinated volatile organic compounds (VOCs) in groundwater. During construction of the new parking lot in March 1989, two underground storage tanks (USTs) were removed under permit and confirmation soil sampling verified non-detect conditions in soil, and trace concentrations of 1,1,1-trichloroethane in groundwater. The City of Santa Barbara destroyed the groundwater monitoring wells B1, C1, and D1 during parking lot construction.

In March 1989, one monitoring well was installed upgradient from parking lot #2 to investigate groundwater conditions at another site. Low concentrations of trichloroethene (TCE), tetrachloroethene (PCE), and 1,2-dichloroethane (1,2-DCA) were detected in groundwater in this well. Consultants properly abandoned the upgradient site well in 1990.

In March 1990, consultants for a site downgradient of parking lot #2 conducted groundwater assessment activities. Five groundwater monitoring wells (MW-1 through MW-5) were installed and four of these wells were properly abandoned by March 1992. The City of Santa Barbara assumed ownership of groundwater monitoring well MW-3 in 1996, due to its proximity and downgradient location to parking lot #2. The City of Santa Barbara sampled downgradient well MW-3 in March 2006 and no fuel hydrocarbons were detected in MW-3 but PCE was detected at $3.4 \, \mu g/L$ (below the maximum contaminant level of $5 \, \mu g/L$ for PCE).

Another upgradient site that is currently undergoing corrective action and assessment is Seaside Shell at 101 Carrillo Street. As part of the Seaside investigation and ongoing semiannual

monitoring requirements for this site, well MW-7 is located northwest and upgradient from parking lot #2. Historically MW-7 has had low concentrations of fuel hydrocarbons, PCE, and 1,2-DCA. The City of Santa Barbara sampled well MW-7 in March 2006 to compare the results from this well to their downgradient well MW-3. The City of Santa Barbara reported that upgradient well MW-7 had no fuel hydrocarbons in groundwater, but PCE was detected at 3.1 micrograms per liter (μ g/L) and TCE was detected at 1.4 μ g/L.

Based on the previous and recent groundwater monitoring results, there appears to be an upgradient source of PCE in groundwater. Based on the groundwater monitoring results presented and because all contaminant sources have been removed, Central Coast Water Board staff confirmed the completion of site investigation at the City of Santa Barbara parking lot #2. The City of Santa Barbara submitted a Case Closure Summary for this site on December 28, 2006, and a Well Abandonment Report on April 5, 2007. Central Coast Water Board staff issued a closure letter for this Site Cleanup case on September 12, 2007.

City of Santa Barbara Parking Lot #11, 19 East Haley Street, Santa Barbara, Santa Barbara County [Thea Tryon, (805) 542-4776]

Prior to 1987, the site located at 19 East Haley Street in Santa Barbara was used for automobile related services. Currently, this site is a paved City of Santa Barbara parking lot. In 1986 and 1987, the City of Santa Barbara excavated and properly disposed of contaminated soil and underground storage tanks that were associated with the past automobile related services. Following soil and tank removal activities, the City of Santa Barbara conducted a site assessment to evaluate subsurface soil and groundwater conditions prior to completion of the parking lot. The City of Santa Barbara's consultant drilled twenty-seven borings and the consultant completed three of these borings into groundwater monitoring wells (MW-1, MW-2B, and MW-3). Groundwater monitoring results conducted in October 1987 indicated the presence of fuel hydrocarbons and chlorinated volatile organic compounds (VOCs) in upgradient monitoring well MW-2B. The City of Santa Barbara did not detect fuel hydrocarbons or chlorinated VOCs in the onsite downgradient groundwater monitoring well MW-1 and the upgradient monitoring well MW-3.

In 1992, the City of Santa Barbara conducted additional groundwater sampling at MW-1, MW-2B, and MW-3. Benzene and 1,2-dichloroethane were detected at 68 and 36 micrograms per liter (μ g/L) in downgradient monitoring well MW-1. In 1992, the City of Santa Barbara reported no fuel hydrocarbons or VOCs in groundwater samples from upgradient monitoring wells MW-2B or MW-3.

In March 2006, the City of Santa Barbara collected groundwater samples for the downgradient groundwater monitoring well MW-1. The City of Santa Barbara could not locate monitoring wells MW-2B and MW-3 and it appears that these wells were covered or paved over during parking lot landscaping or repaving events. After several attempts, MW-2B and MW-3 could not be located. The March 2006 groundwater sampling results indicate that downgradient well MW-1 has no detectable concentrations of fuel hydrocarbons or chlorinated VOCs.

Based on the fact that all contaminant sources have been removed and the March 2006 groundwater monitoring results indicate that no contaminants are detected in groundwater, Central Coast Water Board staff confirmed the completion of site investigation. The City of Santa Barbara submitted the Case Closure Summary for this site on January 8, 2007, and a Well Abandonment Report on April 5, 2007. Central Coast Water Board staff issued a closure letter for this Site Cleanup case on September 12, 2007.

Bob's Corner Store, 198 North Ocean Avenue, Cayucos, San Luis Obispo County [Wei Liu 805-542-4648]

The subject site is an active retail gasoline service station on the northeastern corner of North Ocean Avenue and Cayucos Drive in Cayucos. The responsible party discovered a release of gasoline during underground storage tank (UST) system upgrade work in 1991.

The responsible party conducted several phases of investigation and cleanup, and installed a total of three groundwater monitoring wells. Laboratory analytical results indicated maximum concentrations of total petroleum hydrocarbons as gasoline (TPH-g) at 16,000 micrograms per liter (μ g/L), benzene at 470 μ g/L, and methyl tertiary-butyl ether (MTBE) at 16,000 μ g/L in groundwater samples collected on April 12, 1999. After enhanced bio-remediation in 2001 using oxygen releasing compounds, the maximum concentrations were reduced to TPH-g at 470 μ g/L, benzene at 51 μ g/L, and MTBE at 820 μ g/L on April 8, 2005.

The most recent groundwater sampling results from February 2007 indicate TPH-g and MTBE at maximum concentrations of 70 µg/L and 0.7 µg/L, respectively. All other typical petroleum hydrocarbon constituents of concern (e.g., benzene, toluene, ethylbenzene, xylenes, and other fuel oxygenates) were not detected in groundwater samples. Soil samples collected during facility upgrade activities in February 2007 did not contain TPH-g, total petroleum hydrocarbons as diesel, benzene, or fuel oxygenates at detectable levels.

The depth to groundwater has ranged from approximately eight feet to ten feet below ground surface. Groundwater flow directions beneath the site are variable. No municipal or public drinking water production wells are located within 1 mile of the site. The nearest surface water is the Pacific Ocean, located 400 feet southwest of the site.

Based on site cleanup actions, soil sampling results, and groundwater monitoring results, the groundwater is not impacted above cleanup goals and no further investigation or cleanup is necessary. We have notified the San Luis Obispo County Division of Environmental Health Services Agency, the property owner and other interested parties of our plan to close this case. We have not received comments or objections to the planned closure of this case. The responsible party has been directed to destroy all monitoring wells. Staff will close this case, and the Executive Officer will issue a final case closure letter, upon receipt of a well destruction report documenting the proper destruction of all monitoring wells.

CASES RECOMMENDED FOR CLOSURE

City of Santa Barbara Parking Lot #10, 615 Anacapa Street, Santa Barbara, Santa Barbara County [Thea Tryon, (805) 542-4776]

Staff recommends closure of this site cleanup case where groundwater sample results indicate groundwater pollution remains at concentrations greater than the maximum contaminant level for 1,1-dichloroethene (1,1-DCE). A concentration of 14.7 micrograms per liter (µg/L) and 14.4 µg/L remains in two downgradient groundwater monitoring wells (MW-1 and G-1). Attachment 1, Well Location Map, presents groundwater contaminant concentrations for samples collected on March 22, 2006. All other volatile organic compounds (VOCs) detected in groundwater were below the maximum contaminant level.

Prior to 1960, the City of Santa Barbara parking lot #10 location included an automobile dismantling facility, and nearby onsite business included dry cleaning, electronics, brick manufacturing, and warehouse uses. In 1979, the City of Santa Barbara removed several underground storage tanks, associated with these businesses. In 1987, the City of Santa Barbara conducted a site assessment to evaluate subsurface soil and groundwater conditions prior to construction of a parking lot. City of Santa Barbara consultants installed twelve soil borings and the consultants converted ten of the soil borings into groundwater monitoring wells (MWA1, MWB1, MWB2, MWB6, MWB7, MWE1, MWE2, MWF1, MWF2, and MWG1). The site assessment activities indicated that soil and groundwater samples contained fuel hydrocarbons and chlorinated volatile organic compounds (VOCs).

In 1988, the City of Santa Barbara's consultant properly excavated contaminated soil and treated (or properly disposed of) under the direction of Santa Barbara County Environmental Health Services. In 1988 and 1989, the City of Santa Barbara built the current multi-story parking structure. During construction of the parking structure, the City of Santa Barbara destroyed MWA1, MWB1, MWB2, MWB6, MWE1, MWE2, MWF1, and MWF2. The City of Santa Barbara installed additional groundwater monitoring wells in May 1988 (B8 and B9) and in January 1993 (MW-1, MW-2, and MW-3), to evaluate downgradient contaminant distribution.

The City of Santa Barbara conducted groundwater monitoring and sampling on a regular basis from 1989 until 1995. In August 1995, Central Coast Water Board staff revised Monitoring and Reporting Program No. 93-65 to allow annual monitoring. In March 2006, groundwater monitoring results indicated that low levels of tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), 1,1-dichloroethene (1,1-DCE), 1,1,1-trichloroethane (1,1,1-TCA), 1,1-dichloroethane (1,1-DCA), and chloroform were present in groundwater downgradient and crossgradient of parking lot #10. With the exception of 1,1-DCE, all VOC concentrations detected in groundwater (using US EPA Method 8260B) are below the maximum contaminant level for the respective contaminant. Concentrations of 1,1-DCE were detected at up to 14.7 micrograms per liter (μg/L) and the maximum contaminant level for 1,1-DCE is 6 μg/L.

In 1995, the Central Coast Water Board identified a potential source for PCE contamination upgradient from parking lot #10. In March 2002, the Central Coast Water Board closed the Paseo Nuevo Shopping Center located at 651 Paseo Nuevo (immediately upgradient from parking lot #10) because the Central Coast Water Board identified that another upgradient offsite source of PCE was contributing to PCE in groundwater beneath the Paseo Nuevo Shopping Center.

The depth to groundwater beneath parking lot #10 ranges from 13.65 to 18.2 feet below grade. The groundwater flow direction beneath the site is generally to the east and southeast. The nearest water supply well (that is currently not in operation due to hydrogen sulfide issues) is located approximately 500 feet east of the site. Considering this distance, the depth of the contamination, and the low concentration of 1,1-DCE, the residual contamination is not expected to impact this well.

The City of Santa Barbara has adequately characterized the groundwater plume and the remaining VOCs in groundwater are generally decreasing in concentration. The City of Santa Barbara has removed the contaminant mass from the site to the extent practical, and historical monitoring data indicate that VOCs are expected to continue to decrease with time. Therefore, based on the information provided, we have no further requirements for groundwater monitoring, investigation, or cleanup of the site.

Staff's recommendation for closure is based on the following:

- (1) The majority of contaminant mass has been removed,
- (2) Remaining groundwater pollution above maximum contaminant levels is very limited in extent and is generally decreasing in concentration,
- (3) Remaining VOCs in groundwater are unlikely to reach a drinking water supply well,
- (4) The presence of upgradient PCE sources and the upgradient Paseo Nuevo Shopping Center case closure, and
- (5) Closure is consistent with Section III.G. of State Board Resolution No. 92-49, allowing the consideration of cost effective abatement measures for a site where attainment of reasonable objectives less stringent than background water quality does not unreasonably affect present or anticipated beneficial uses of groundwater, and will not result in water quality less than that prescribed by the Basin Plan.

In addition, Water Board staff has evaluated remaining groundwater concentrations with respect to possible indoor air impacts. Comparison of the groundwater concentrations with corresponding environmental screening levels for commercial land use indicate no significant threat to human health or the environment.

Unless the Water Board objects, and pending monitoring well destruction, the Executive Officer will issue a case closure letter for this site cleanup case.

Attachment 2: Site Map

C & A Auto Service, 480/482 East Market Street, Salinas, Monterey County, [John Goni 805-542-4628]

Staff recommends closure of this leaking underground storage tank (UST) case where concentrations of petroleum hydrocarbons constituents have attenuated to near water quality objectives. Analyses of groundwater samples obtained August 9, 2007 determined a maximum benzene concentration in monitoring well MW-2 of 1.3 micrograms per liter (μ g/L). The water quality objective for benzene is 1μ g/L. Other petroleum hydrocarbons and fuel oxygenates were not detected or were detected at concentrations less than cleanup goals.

The site is an automobile repair shop. An onsite UST, not used since 1970, was removed in 1994. Investigations revealed residual gasoline hydrocarbons in soil and groundwater immediately adjacent to the former tank. August 1995 sampling detected total petroleum hydrocarbons (TPH) at a concentration of 4,200 milligrams per kilogram (mg/kg) in soil and 4,200 microgram per liter (μ g/L) in groundwater, and benzene was found at 37 mg/kg in soil and 390 μ g/L in groundwater.

The groundwater contaminants have attenuated to concentrations below or near the water quality objectives. Monterey County Health Department (MCHD) is granting closure of the soil cleanup, conditioning closure on paving the site to prevent vapor emissions and leaching of residual contaminants, a property notification of the soil contaminants, and a requirement of a risk assessment and/or soil remediation if the land use changes or the property is redeveloped. Staff is now proceeding with recommended closure since MCHD conditions for soil closure have been met. MCHD has concurred with the recommended closure by the Central Coast Water Board.

Depth to groundwater varies from 13 to 27 feet below ground surface and flow direction varies. The nearest domestic supply well is approximately 1,200 feet southwest of the former UST. The remaining residual petroleum hydrocarbons are unlikely to impact these wells considering the distance, groundwater flow direction, well construction details, and chemical characteristics (including concentrations) of the contaminants.

The site is within the Chualar Hydrologic Area of the Salinas River Hydrologic Unit (309.20), for which the "Water Quality Control Plan, Central Coast Region" (Basin Plan) designates groundwater as having beneficial uses of domestic and municipal supply, agricultural supply, and industrial supply.

The groundwater plume extent has been adequately characterized and is limited to an area immediately adjacent to the former UST. Contaminant concentration is declining, and concentrations are expected to continue to decrease with time. Therefore, based on the information provided, we have no further requirements for groundwater monitoring, investigation or cleanup of the site.

Our recommendation for closure is based on the following:

- (6) The majority of contaminant mass was removed by excavation of contaminated soil at the time of tank removal,
- (7) Remaining groundwater pollution above cleanup goals is limited in extent and decreasing in size and concentration,
- (8) Remaining hydrocarbon constituents are unlikely to reach a drinking water supply well,
- (9) Benzene concentrations above the cleanup goal of 1.0 μg/L are limited to an area on the site.
- (10) Closure is consistent with Section III.G. of State Water Resources Control Board Resolution No. 92-49, allowing the consideration of cost effective abatement measures for a site where attainment of reasonable objectives less stringent than background water quality does not unreasonably affect present or anticipated beneficial uses of groundwater, and will not result in water quality less than that prescribed by the Basin Plan.

In addition, Central Coast Water Board staff has evaluated remaining groundwater concentrations with respect to possible indoor air impacts, and soil concentrations with respect to direct human exposure, indoor air impacts, and potential leachability to groundwater. Comparison of these soil and groundwater concentrations with corresponding environmental screening levels for residential land use and construction worker direct exposure scenarios indicate no significant threat to human health or the environment given the conditions of closure by MCHD.

Based on the soil and groundwater cleanup actions and groundwater monitoring results, there is no threat to groundwater resources and no further soil or groundwater investigation or cleanup is necessary. In addition, MCHD, as the lead agency for soil investigation and cleanup activities, has concurred with case closure. The property owner/fee title owner, and nearby property owners have been notified of the proposed case closure and have not objected.

Unless the Central Coast Water Board objects and pending monitoring well destruction, the Executive Officer will issue a case closure letter pursuant to California Underground Storage Tank Regulations.