CASE CLOSURE SUMMARY
LOW-THREAT UNDERGROUND STORAGE TANK CASE CLOSURE POLICY
LEAKING UNDERGROUND FUEL STORAGE TANK PROGRAM

I. AGENCY INFORMATION

DATE: 8/20/2024

AGENCY NAME:	**California Regional Water Quality Control Board, Colorado River Basin Region**	
ADDRESS:	**73-720 Fred Waring Drive, Suite 100, Palm Desert, CA 92260**	
STAFF PERSON:	**Monica Aragon G.**	TELEPHONE: (**760) 776 - 8940**

II. CASE INFORMATION

SITE NAME: **COCA-COLA BOTTLING COMPANY (Site)**	
SITE ADDRESS: **126 South Third Street, El Centro, CA 92243**	
RB LUST CASE NO: USTCF CLAIM NO:	LOCAL AGENCY NO:
UNAUTHORIZED RELEASE FORM DATE:	

RESPONSIBLE PARTIES:	ADDRESS	TELEPHONE
The Coca-Cola Company (Alexandra Roy)	**One Coca-Cola Plaza, Atlanta GA 30313**	**(470) 217-3130**

NUMBER of TANK	SIZE (GAL)	CONTENTS	REMOVED/REPLACED/ CLOSED IN PLACE?	DATE
1	**2,000**	**Diesel**	**Removed**	**May 1989**
2	**100**	**Used oil**	**Removed**	**December 1999**

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

CAUSE OF RELEASE: **Unknown**					
TYPE OF RELEASE: **Diesel and used oil**					
CHARACTERIZATION COMPLETE?	**YES**	**[X]**	NO	[ ]	
MONITORING WELLS INSTALLED?	**YES**	**[X]**	NO	[ ]	NUMBER: **5**
GW DEPTH BELOW GROUND SUR. (ft): HIGHEST: **8.75**			LOWEST: **10.13**		
GW FLOW DIRECTION: **North to northeast, predominantly northeast.**					
MOST SENSITIVE CURRENT GW USE:	**Industrial and Municipal / Domestic**				
ARE DRINKING WATER WELLS AFFECTED:			YES	[ ]	**NO [X]**
IS SURFACE WATER AFFECTED:			YES	[ ]	**NO [X]**

NEAREST AFFECTED SW NAME:	**NA**
REPORT (S) ON FILE?	**YES [X]** NO [ ]
LOCATION OF REPORT(S) FILED:	https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000019745

TREATMENT & DISPOSAL OF AFFECTED MATERIAL

MATERIAL	AMOUNT (tons)	ACTION, TREATMENT, OR DISPOSAL DESTINATION	DATE
Soil	**0.09**	**Disposal Crosby & Overton, Inc. Long Beach, CA**	**7/5/2018**
Soil	**0.31**	**Disposal Soil Safe of California, Inc., Adelanto, CA**	**6/28/2019**
Soil	**2.73**	**Disposal Soil Safe of California, Inc., Adelanto, CA**	**3/31/2020**

IV. MAXIMUM CONTAMINANT CONCENTRATIONS BEGINNING AND FINAL

(A) SOIL

Contaminant	SOIL BEGINNING (mg/kg) DATE SAMPLED: **12/27/2017**	DEPTH (ft)	SOIL FINAL (mg/kg) DATE SAMPLED: **3/7/2024**	DEPTH (ft)	LTCP[1] (mg/kg) For Residential/ Commercial Criteria	DEPTH (ft)	PASSED/ FAILED COMPARED TO LTCP
Diesel (DRO)	**2,500 (SB02)**	**2**	**3.8J (SB02-D) 160 (SB02-W1)**	**3 2**			**Passed**
Oil (ORO)	**3,300 (SB02)**	**2**	**5.8 (SB02-D) 1,600 (SB02-W1)**	**3 2**			**Passed**
BENZENE	**<2.4**	**2 - 11.5**	**NA**	**-**	**1.9 – 2.8**	**5 - 10**	**Satisfied[2]**
Ethylbenzene	**6.4 (MW-04)**	**8**	**NA**	**-**	**21-32**	**5 - 10**	**Satisfied[3]**
Naphthalene	**10 (MW-04)**	**8**	**NA**	**-**	**9.7- 45**	**5 - 10**	**Satisfied[4]**

[1] Low-Threat Underground Storage Tank Case Closure Policy (LTCP), Table 1, Commercial Criteria. Concentrations of Petroleum Constituents in Soil That Will Have No Significant Risk of Adversely Affecting Human Health.
[2] [2]The case meets LTCP Criterion 3a; maximum concentrations of petroleum constituents in soil are less than those listed in Table 1 of the LTCP for residential criteria.
[3] The case meets LTCP Criterion 3a; maximum concentrations of petroleum constituents in soil are less than those listed in Table 1 of the LTCP for residential criteria.
[4] The case meets LTCP Criterion 3a; maximum concentrations of petroleum constituents in soil are less than those listed in Table 1 of the LTCP for commercial criteria.

(B) SOIL GAS

CONTAMINANT	SOIL VAPOR BEGINNING ($\mu g/m^3$) DATE SAMPLED: **SB-02 (12/27/2017)**	SOIL VAPOR FINAL ($\mu g/m^3$) DATE SAMPLED: **SB02-D (3/7/2024) RSV-01[5] (3/11/2024)**	DEPTH (ft)	Oxygen (%)	LTCP[1] Oxygen>4% ($\mu g/m^3$)	PASSED/FAILED COMPARED TO LTCP[6]
TPH(g) gasoline in soil	**Not Analyzed (NA)**	**Not Analyzed**	**5**	**NA**	**<100 mg/kg**	**Satisfied [7]**
TPH(d) diesel in soil	**2,500 (at 2 feet in SB02)[4]**	**3.8J (at 3 feet bgs) 160 SB02-W1 at 2 feet**	**5**	**NA**	**<100 mg/kg**	**Satisfied[8]**
BENZENE	**NA**	**<3.1**	**5**	**16.5**	**<85**	**Satisfied**
ETHYLBENZENE	**NA**	**<6.5**	**5**	**16.5**	**<1,100**	**Satisfied**
NAPTHALENE	**NA**	**<3.3**	**5**	**16.5**	**<93**	**Satisfied**
OVERALL						**Satisfied**

[5] RSV-01 is the nearest soil vapor probe to soil boring SB-02 and SB02 confirmation samples
[6] Low-Threat Underground Storage Tank Case Closure Policy (LTCP), Appendix 4, Scenario 4 – Direct Measurement of Soil Gas Concentrations (1 of 2), Soil Gas Sampling – No Bioattenuation Zone: Oxygen is greater than four percent measured at the bottom of the five-foot zone, but TPH (TPHg + TPHd) are above 100 mg/kg (TPHd is 160 mg/kg measured within the five-foot zone.)
[7] Satisfied as release did not include gasoline only diesel and used oil were previously stored onsite.
[8] 4 Satisfied Residential levels as soil vapor concentrations for benzene, ethylbenzene and naphthalene were not reported above the reporting limits although a bioattenuation zone is not present due to the concentration of TPHd at 160 mg/kg.

(C) GROUNDWATER

CONTAMINANT	BEGINNING (µg/L) DATE SAMPLED **MW-04** **06/03/2020**[19]	FINAL (µg/L) DATE SAMPLED **MW-04** **08/03/2021**	LTCP Groundwater-Specific Criteria (1 - 5)
GRO	**11,000**	**3.000**	**Criteria (5)** The regulatory agency determines, based on analysis of site-specific conditions that 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 will be achieved within a reasonable frame. These conditions are: a. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. b. While light non-aqueous phase hydrocarbons (LNAPL) are intermittently present in well MW-4, the LNAPL in the well has not exceeded a thickness of 0.06 feet in thickness. The plume does not extend off-site and is stable. c. The nearest existing water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. d. The dissolved concentration of benzene is less than 1,000 and MTBE has not been reported above laboratory detection limits.
DRO	**890**	**480**	
BENZENE	**47**	**8.2**	
TOLUENE	**860**	**200**	
ETHYLBENZENE	**660**	**200**	
TOTAL XYLENES	**m,p-xylenes: 1.600** **o-xylene: 920**	**800**	
MTBE	**<2.5**[102]	**<0.34**	
TBA	**NA**	**NA**	
HEAVY METALS	**NA**	**NA**	
OTHER	**NA**	**NA**	

V. FREE PRODUCT

WAS FREE PRODUCT ENCOUNTERED?	**YES [X]**	NO [ ]
HAS FREE PRODUCT BEEN ADEQUATELY RECOVERED?	**NA**[11]	

[9] **Date of highest concentration values collected during the second sampling of the well.**
[10] **MTBE not reported above the detection limits.**
[11] **LNAPL has been only reported in well MW-04 between 0.06 AND 0.02 Feet thick and is not recoverable due to the intermittent thickness of the LNAPL in the well.**

VI. CLOSURE

DOES COMPLETED CORRECTIVE ACTION PROTECT EXISTING BENEFICIAL USES PER THE REGIONAL BOARD BASIN PLAN? **YES [X]** NO [ ]
DOES COMPLETED CORRECTIVE ACTION PROTECT POTENTIAL BENEFICIAL USES PER THE REGIONAL BOARD BASIN PLAN? **YES [X]** NO [ ]
DOES THE CORRECTIVE ACTION PROTECT PUBLIC HEALTH FOR CURRENT LAND USE? **YES [X]** NO [ ] IF NO: WAS QUANTITATIVE OR QUALITATIVE RISK EVALUATION PERFORMED? YES [ ] NO [ ] (briefly describe below) IF LAND USE CHANGES SHOULD RISK BE RE-EVALUATED? YES [ ] NO [X] (briefly describe below)
SITE MANAGEMENT REQUIREMENTS? YES [ ] **NO [X]**
SHOULD CORRECTIVE ACTION BE REVIEWED IF LAND USE CHANGES? YES [ ] **NO [X]**
MONITORING WELLS DECOMMISSIONED: YES [ ] NO [X] NUMBER DECOMMISSIONED: 0 NUMBER WILL BE DECOMMISSIONED: 5 NUMBER RETAINED: **0**
LIST ENFORCEMENT ACTIONS TAKEN: **NA**
LIST ENFORCEMENT ACTIONS RESCINDED: **NA**

VII. REMEDIATION SUMMARY, CLOSURE RATIONALE, AND RECOMMENDATION FOR CLOSURE

Site History

The approximately 1.2-acre facility is located at 126 South Third Street in El Centro, California. The site consists of two parcels and according to the Assessor's Office, the assessor's parcel numbers (APNs) for the site are 053-120-007 and 053-120-019. The site is developed with an approximately 21,000-square-foot building, which is located on the southern portion of the site. The single-story building houses storage and office operations (Figure 1). The site is accessed from South Third Street at the eastern site boundary. The access drive leads to an asphalt-paved parking and loading dock area present on the northern portion of the site. There are no landscaped areas and no on-site surface water bodies. The facility is located in a primarily industrial land use area. The nearest residential area is located approximately 550 feet east of the site. Surrounding properties consist of vehicle repair shops, a veterinarian office, a car rental office and a welding and mechanical facility and a paint supply shop.

The site has been developed since at least 1910, when Soda Water Works (a predecessor of the Company) acquired the center portion of the site for use in beverage production. The northern, southern, and southwestern portions of the site were developed for residential, commercial, and industrial uses between the 1910s and the 1970s or 1980s; the facility's beverage manufacturing operations expanded to the southern and southwestern portions of the site by the 1930s, and the northern portion of the site was acquired for parking and loading dock use in the 1970s or 1980s. Coca-Cola Bottling Company acquired Soda Water Works sometime between 1922 and 1949, and continued to operate at the site. Beverage manufacturing operations were ceased in the 1960s or 1970s, and operations were limited to warehousing and distribution of beverage products. The operations were further limited to distribution only in 2012. In 2018, the facility was acquired by Reyes Coca-Cola Bottling, L.L.C., which continues to own and operate the site for beverage distribution operations. Two USTs were identified as having been at the Site. A 2,000-

gallon diesel UST was located since at least the 1980s north of the Site building and was removed in May 1989. A 100-gallon used oil UST was discovered in December 1999 during construction of a loading dock north of the building. The used oil UST was removed at that time and was found to be leaking and 12 cubic yards of contaminated soil were excavated in January 2000. Regulatory closure for the used oil UST was issued by the Imperial County Planning Department.

Various soil borings have been advanced at the Site. Two soil vapor probes (RSV-1 and RSV-2) were installed at the Site near the site building to evaluate soil vapor intrusion. Five groundwater monitoring wells (MW-1 through MW-5) were installed at the Site to evaluate groundwater (Figures 2 and 3).

Remediation Summary

Remediation activities have not been conducted at the Site as chemical concentrations have met low threat closure policy criteria.

Closure Rationale

Under current site conditions, remaining petroleum contaminants in groundwater do not pose significant risk to human health, safety, or the environment, and will naturally attenuate.

Rationale for Closure under the Low Threat UST Closure Policy (LTCP)

Any remaining concentrations of petroleum hydrocarbons present in soil vapor, soil and/or groundwater are not likely to pose a threat to any sensitive receptors due to their concentrations. Based on the results of the site investigations, the Site meets the requirements of the California State Water Resources Control Board (SWRCB) LTCP (SWRCB, 2012) for low threat case closure based on the following criteria:

General Criteria

Site satisfies the following eight general listed as follows:

a. The unauthorized release is located within the service area of a public water system. The area of the Site is serviced by the El Centro Public Works Department.
b. The unauthorized release consists only of petroleum. The unauthorized release consisted of TPH (gasoline, diesel and oil) and petroleum-related products.
c. The unauthorized ("primary") release from the UST system has been stopped. Leaking USTs were removed from the Site in 1989 and 2000.
d. Free product has been removed to the maximum extent practicable. Removal of remaining free product in well MW-4 with thicknesses less than 0.06 feet is not practicable.
e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed. The conceptual site model was submitted on March 8, 2022 with an addendum dated November 28, 2022.
f. Secondary source has been removed to the extent practicable. Removal of remaining free product, soil and groundwater impacts and free product is not practicable.
g. Soil or groundwater has been tested for methyl tert-butyl ether (MTBE) and results reported in accordance with Health and Safety Code section 25296.15. MTBE has been tested for and was not reported above the laboratory reporting limits.
h. Nuisance as defined by Water Code section 13050 does not exist at the site.

Media-Specific Criteria

1. **Groundwater**

The case meets Policy Criterion (5).

The regulatory agency determines, based on analysis of site-specific conditions that 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 will be achieved within a reasonable frame.
These conditions are:

a. The contaminant plume that exceeds water quality objectives is less than 100 feet in length.
b. While there is LNAPL in well MW-4. The presence of LNAPL in the well is intermittent and has not exceeded a thickness of 0.06 feet in thickness. The plume does not extend off-site.
c. The nearest existing water supply well or surface water body is greater than 1,000 feet from the defined plume boundary.
d. The dissolved concentration of benzene is less than 1,000 and MTBE has not been reported above laboratory detection limits.

2. Petroleum Vapor Intrusion to Indoor Air

The case meets Policy Criterion_2a - Scenario 4: Direct Measurement of Soil Gas Concentrations (2 of 2), Soil Gas Sampling – With No Bioattenuation Zone: Oxygen is greater than four percent measured at the bottom of the five-foot zone but remaining TPH (TPHg + TPHd) is 160 mg/kg (measured within the five-foot zone) and the soil gas concentrations for benzene, ethylbenzene, and naphthalene meet the residential soil gas criteria and have not been reported above the laboratory detection limits.

3. Direct Contact and Outdoor Air Exposure

The case meets Policy Criterion 3a; maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 of the Policy for the specified depth below ground surface.

Recommendation for Closure

Current concentrations at the Site show that the protection of human health, safety, and the environment has been assured, and is consistent with chapter 6.7 of division 20 of the Health and Safety Code, implementing regulations, applicable state policies for water quality control and water quality control plans. Case closure is recommended.

List of Acronyms:

TPH – total petroleum hydrocarbons
TPHg – total petroleum hydrocarbons as gasoline
TPHd – total petroleum hydrocarbons as diesel
GRO – gasoline-range organics
DRO – diesel-range organics
MTBE – methyl *tert*-butyl ether
TBA – tert-butyl alcohol
UST – underground storage tank
ND – non-detectable
NA – not applicable or not analyzed
NS – not sampled
mg/kg – milligrams per kilogram
µg/L – micrograms per liter
ppm – parts per million
ppb – parts per billion

Figure 1. Summary of Nearby Properties and Features

Figure 2 Step Out Soil Sampling Results

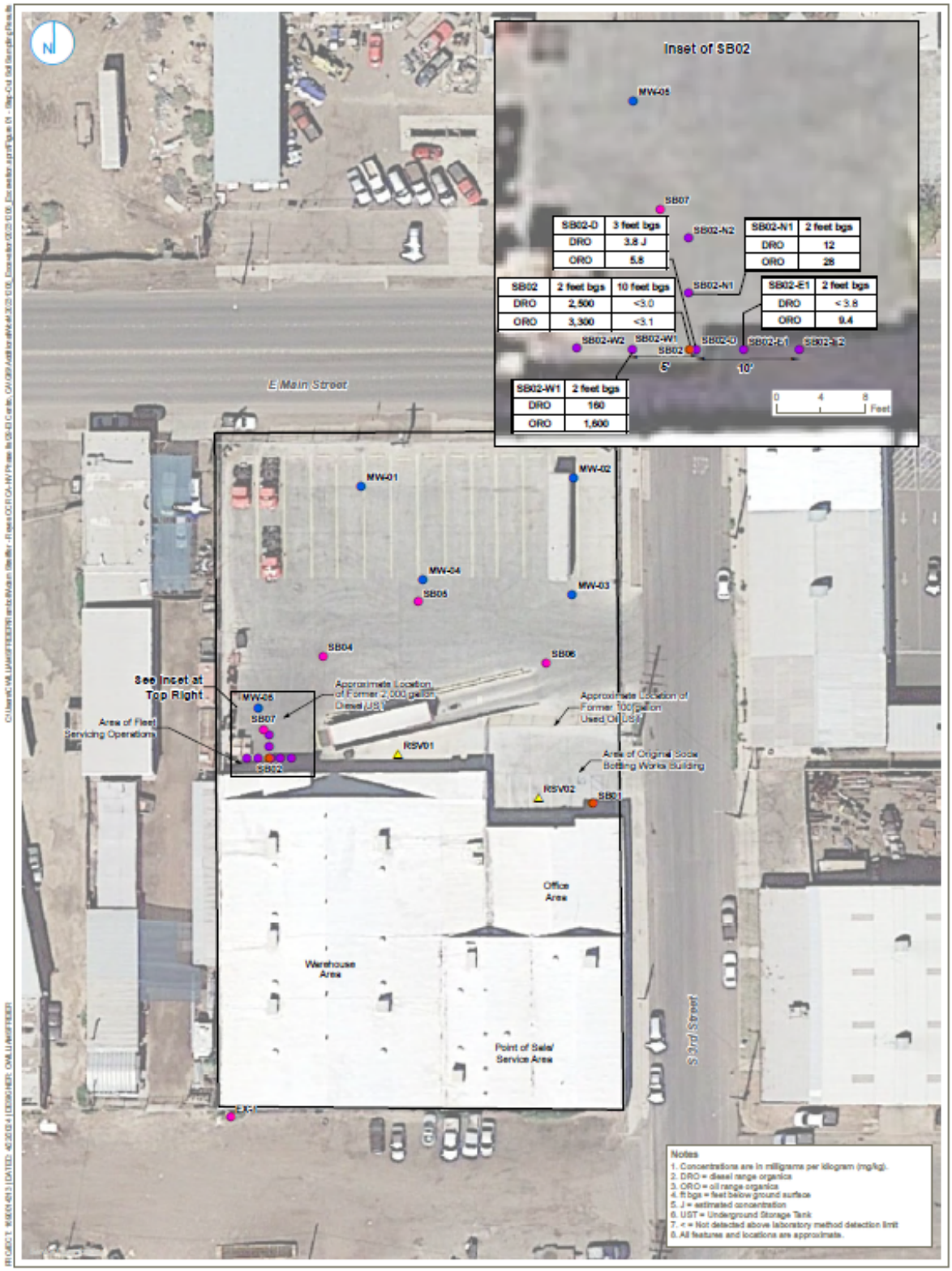
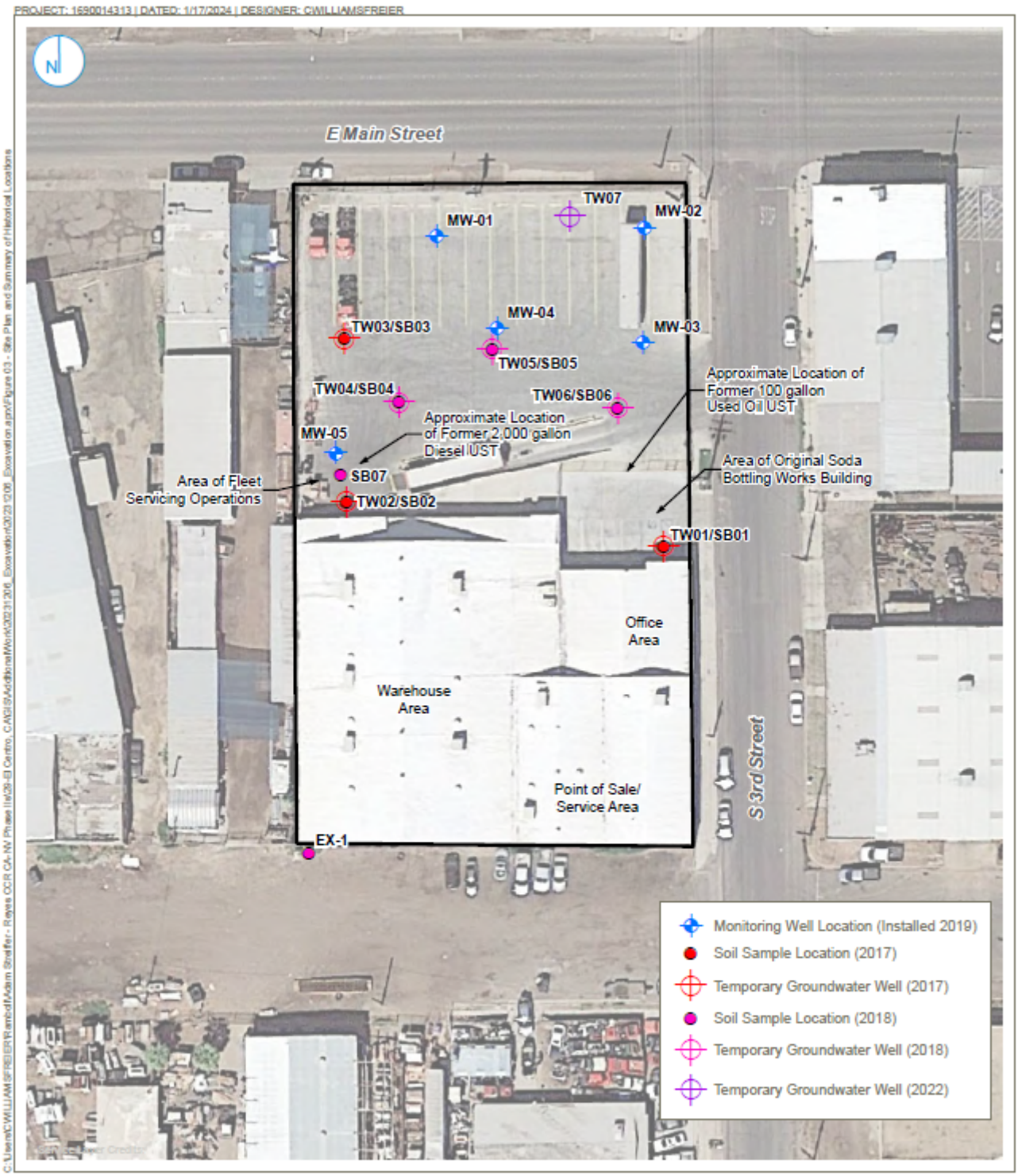


Figure 3. Site Plan and Summary of Historical Sampling Locations



Note:
1. Monitoring well locations were surveyed by a California licensed surveyor. All other sampling locations and features are approximate.
2. Former Underground Storage Tank (UST) locations are based on not-to scale drawings, and are estimated locations only.

0 30 60 Feet

SITE PLAN AND SUMMARY OF HISTORICAL SAMPLING LOCATIONS

BCI Coca-Cola Bottling Company of Los Angeles
126 South Third Street
El Centro, California

FIGURE 03

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL