

## State Water Resources Control Board

### UNDERGROUND STORAGE TANK (UST) CASE CLOSURE SUMMARY

#### Agency Information

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| Agency Name:<br>San Francisco Bay Regional Water Quality<br>Control Board<br>(San Francisco Bay Water Board) | Address:<br>1515 Clay Street, Suite 1400<br>Oakland, CA 94612 |
| Agency Caseworker: Laurent Meillier  | Case No.: 21-0030   |

#### Case Information

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| UST Cleanup Fund (Fund) Claim No.:<br>21119                            | Global ID: T0604100029  |
| Site Name:<br>Chevron  | Site Address:<br>5810 Nave Drive<br>Novato, CA 94947 (Site)   |
| Responsible Party<br>Chevron U.S.A., Inc.<br>Attention: Bradley Rogers | Address:<br>6001 Bollinger Canyon Road<br>San Ramon, CA 94583 |
| Fund Expenditures to Date: \$0   | Number of Years Case Open: 40                                 |

**GeoTracker Case Record:** <http://geotracker.waterboards.ca.gov/?gid=T0604100029>

#### Summary

**This case has been proposed for closure by the State Water Resources Control Board at the request of the San Francisco Bay Water Board, which concurs with closure.**

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 because they pose a low threat to human health, safety, and the environment. The Site meets all of the required criteria of the Policy and therefore, is subject to closure.

The Site is a vacant lot and public street that formerly operated as a commercial petroleum fueling facility. An unauthorized release was discovered in 1983 during a tank tightness test and in 1984 the facility was demolished. Four USTs, two dispenser

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islands, and associated piping were removed. The public right of way was expanded after station demolition and much of the former fueling facility was paved over as Nave Street. No active remediation has been conducted at this Site. Ten groundwater monitoring wells have been installed since 1998 and one has been destroyed. Monitoring wells were monitored regularly through 2022 and water quality objectives have been achieved for all constituents except benzene in MW-1, MW-2, MW-5, and MW-7. However, the remaining benzene plume is less than 250 feet in length and concentrations are below Policy criteria and are low risk to human health and the environment.

The residual petroleum constituents remaining in groundwater are limited in areal extent and the plume of impacted groundwater is stable. Soil vapor samples indicate non-detectable concentrations of benzene, ethylbenzene, and naphthalene. Remaining petroleum constituent concentrations in shallow soil are below Policy criteria.

Remaining petroleum constituents are limited, stable, and decreasing. Additional assessment would be unnecessary and will not likely change the conceptual model. Any remaining petroleum constituents do not pose significant risk to human health, safety, or the environment under current conditions.

#### **Rationale for Closure Under the Policy**

- General Criteria – Site **MEETS ALL EIGHT GENERAL CRITERIA** under the Policy.
- Groundwater Media-Specific Criteria – Site meets the criteria in **Class 2**. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest existing 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 micrograms per liter ( $\mu\text{g/L}$ ), and the dissolved concentration of MTBE is less than 1,000  $\mu\text{g/L}$ .
- Petroleum Vapor Intrusion to Indoor Air – Site meets **Criteria 2 (a), Scenario 4**. The concentrations of benzene, ethylbenzene, and naphthalene in soil gas are less than the Policy limits as it applies to the bioattenuation zone, land use, and existing or planned future building structures at the Site.
- Direct Contact and Outdoor Air Exposure – Site meets **Criteria 3 (a)**. Maximum concentrations of petroleum constituents in soil from confirmation soil samples are less than or equal to those listed in Table 1 of the Policy.

## Response to Public Comments

In a September 27, 2023, teleconference, North Marin Water District (NMWD) provided public comments to the State Water Board and the San Francisco Bay Water Board (collectively, the Water Boards) regarding a drinking water conveyance pipeline located immediately adjacent to the Site. NMWD additionally provided their comments in writing to the Water Boards in an October 2, 2023, letter. Following discussion with NMWD, the Water Boards finds that case closure is still warranted at this Site. NMWD's comments and the State Water Board's response are provided below:

1. The existing potable distribution system could be a possible sensitive receptor to residual contamination in the subsurface if the pipeline becomes depressurized. This scenario may create conditions that could draw the contaminated groundwater to NMWD's pipeline.

Response: Historic depth to groundwater data were generally 6 feet below ground surface (bgs) or deeper and the bottom of the NMWD's pipeline is located at approximately 5 feet bgs. Therefore, it is expected that any interaction between the pipeline and the water table are minimal. Additionally, the groundwater contaminant plume is stable and within the property boundary. The highest total petroleum gasoline and benzene concentrations in groundwater were reported in 2022 at MW-7 at 11,000 micrograms per liter ( $\mu\text{g/L}$ ) and 2,200  $\mu\text{g/L}$ , respectively. The groundwater gradient is to the northeast and MW-7 is located approximately 100 feet down- to crossgradient of NMWD's pipeline. Since groundwater flows away from the potable water distribution pipeline, it is unlikely that contaminants will impact NMWD's pipeline. In addition, groundwater data collected at MW-1 and MW-2 indicate a precipitous decline in concentrations in the direct downgradient vicinity of the pipeline. Any residual contamination in soil and groundwater will continue to attenuate over time due to natural biodegradation processes.

2. Additional soil and groundwater characterization is needed within NMWD's pipeline alignment to gauge if additional protective provisions are necessary in the Soil and Groundwater Management Plan (SGMP) ahead of an excavation.

Response: Shallow soil samples taken near the NMWD pipeline (MW-1, MW-5, B-3, C-2, and C-3) indicate that concentrations of petroleum-related constituents are below the criteria outlined in Table 1 of the Policy. The concentration criteria in Table 1 protect from ingestion, direct contact, and inhalation of volatile soil emissions. Since existing soil conditions do not currently pose a threat to workers, additional characterization of subsurface conditions is not warranted. However, to ensure the safety of site workers, it is a condition of closure that a designated authorized representative (including a consultant) of Chevron Environmental Management Company (CEMC) be onsite for any excavation activities to monitor for potential exposure and to ensure safe handling of excavated soil, as outlined in the September 2022 *Soil and Groundwater Management Plan*. NMWD should contact both the San Francisco Bay Water Board and CEMC prior to any planned or unplanned excavation activities on or near the Site to ensure a CEMC representative can be present.

3. Future excavation of the NMWD's facilities near the Site may encounter contamination. Please clarify that CEMC is responsible for profiling the contaminated soil or groundwater within the trench excavation.

Response: CEMC is responsible for addressing any additional work if contaminated soil or groundwater is encountered during future excavation on or near the Site. NMWD should contact CEMC, the City of Novato, and the San Francisco Bay Water Board if any petroleum-impacted soil and groundwater is found.

4. Please clarify that CEMC or another entity will be responsible for handling and disposal of any contaminated soil or groundwater encountered during NMWD's excavation activities near the Site.

Response: CEMC will be responsible for handling and disposing of petroleum-impacted soil and groundwater if encountered during excavation activities on or near the Site. NMWD is not responsible for cleanup work associated with San Francisco Bay Water Boards case #21-0030 (Global ID T0604100029). CEMC must be notified as early as possible to provide consultation on the profiling and eventual disposal or reuse of any Covered Soil and discharge or disposal of any Covered Groundwater. CEMC may be reached at (925) 842-1000.

5. In addition to notifying the City of Novato, please notify NMWD if CEMC is replaced by another entity.

Response: CEMC will notify the City of Novato, or the current property owner(s), if it is replaced by a successor in interest or some other entity. The San Francisco Bay Water Board will also notify NMWD if the responsible party contact information changes from that provided in the SGMP.

### **Recommendation for Closure**

The corrective action performed at this Site ensures the protection of human health, safety, and the environment. The corrective action performed at this Site 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 applicable water quality control plans. Case closure is recommended.

Reviewed By:



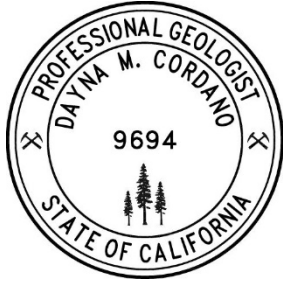
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Dayna Cordano, PG No. 9694  
Senior Engineering Geologist

Revised: 11/22/2023

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Date



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