

Objections to Closure and Response

Regarding Yorba Country Car Wash, 17581 Yorba Linda Blvd., Yorba Linda

Claim #14283

The Draft Review Summary Report was emailed to Orange County Health Care Agency (County) on April 28, 2015 with a request for a teleconference to discuss closure of the site. In an email dated May 8, 2015, the County staff stated that they would not close the case, but would not object to the State Water Board staff closing the site as long as the County's objections, as presented on the Low Threat Closure Checklist dated May 4, 2015, were made public. The objections are presented below:

- Comment 1: Inadequate conceptual site model. The groundwater plume is not defined.
Response 1: Adequate data are available in GeoTracker to develop a conceptual site model as defined by the Policy. Downgradient offsite groundwater monitoring well MW-21S has been monitored since 2009 and has indicated primarily nondetectable petroleum hydrocarbon concentrations.
- Comment 2: Secondary source was not removed to the extent practicable. Remediation was designed and implemented incorrectly.
Response 2: Secondary source removal activities include excavation of 665 tons of contaminated soil and active remediation. Dual phase extraction conducted between March 2001 and August 2005, removed 2.6 million gallons of contaminated groundwater including an estimated 13,163 pounds of total petroleum hydrocarbons as gasoline (TPHg). The volume of recovered petroleum hydrocarbons combined with a dissolved constituent plume that is stable and decreasing in areal extent indicate that the remediation method was effective in removing secondary source.
- Comment 3: The site does not meet any of the Groundwater specific criteria scenarios.
Response 3: Although a concrete lined storm drainage canal is located approximately 400 feet west and crossgradient from the defined plume boundary, there is no hydraulic connection between the canal and groundwater beneath the Site. Due to the presence of the canal within 1,000 feet of the defined plume boundary, the case meets Policy Criterion 1 by Class 5. If not for the canal, the case meets Policy Criterion 1 by Class 4. The contaminant plume that exceeds water quality objectives is less than 1,000 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 concentrations of benzene and MTBE are each less than 1,000 micrograms per liter ($\mu\text{g/L}$).

- Comment 4: The case does not meet any of the Petroleum Vapor Intrusion to Indoor Air specific criteria scenarios. No soil gas samples have been collected.

Response 4: The case meets Policy Criterion 2b. Although no document titled "Risk Assessment" was found in the files reviewed, a professional assessment of site-specific risk from exposure through the vapor intrusion pathway was performed by Fund staff. The assessment found that there is no significant risk of petroleum vapors adversely affecting human health. The onsite building is a car wash facility with multiple rollup doors that would prevent the accumulation of soil vapors in the building. In addition, as a car wash there would adequate air exchange provided by the building's ventilation system required to control vehicle exhaust generated during car wash activities.

- Comment 5: The case does not meet any of the Direct Contact and outdoor Air Exposure criteria scenarios.

Response 5: The 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 was completed by Fund staff. The results of the assessment found that maximum concentrations of petroleum constituents remaining in soil will have no significant risk of adversely affecting human health. Approximately 665 tons of soil was excavated and transported offsite in 2003 following the removal of three gasoline USTs. The Site is paved and accidental exposure to site soils is prevented. Therefore, the pathway is incomplete. Any construction crew performing subsurface work will be prepared to deal appropriately with environmental hazards anticipated or encountered in their normal daily work. The presence of residual contamination should be taken into account when issuing and executing excavation or building or other permits at the Site, including but not limited to the inclusion of a Competent Person in the work crew.