

State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Sacramento County Environmental Management Department (County)	Address: 10590 Armstrong Avenue, Suite A, Mather, CA 95655
Agency Caseworker: Sue Erikson	Case No.: G012

Case Information

USTCF Claim No.: 17716	Global ID: T0606700118
Site Name: A&A Building Supply	Site Address: 6700 Folsom Blvd., Sacramento, CA 95819
Responsible Party (RP): Tony Gonzales, Gonzales-Kimmel Enterprises Ltd. LP	Address: 6800 Folsom Blvd., Sacramento, CA 95819
USTCF Expenditures to Date: \$127,757	Number of Years Case Open: 25

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0606700118

Summary

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. 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:

An unauthorized leak was reported in August 1987 following the removal of three underground storage tanks (USTs). Four monitoring wells have been installed and monitored since 2004. An unknown amount of soil was excavated, transported and disposed offsite after the UST removal activities. No active remediation has been conducted. According to groundwater data, water quality objectives have been achieved for all constituents except for total petroleum hydrocarbons as gasoline (TPHg) and benzene.

The petroleum release is limited to the shallow soil and 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 250 feet of the defined plume boundary. No other water supply wells have been identified within 250 feet of the defined plume boundary in files reviewed. Water is provided to water users near the Site by the City of Sacramento Water 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 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 Specific Criteria: The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. No free product is present. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2b. A professional assessment of site-specific risk from exposure through the vapor intrusion pathway shows that maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. Soil data were not available for review, but remaining concentrations in the near-surface after 25 years are not anticipated to be significant. The former source area is outside the existing building in a driveway and loading dock area. The building is a warehouse-style building currently utilized by Red Dog Shred as a document shredding service and drop-off location. The building interior is accessed through a set of glass doors on the west side of the building for public access and a metal door and a roll-up door on the south side of the building in the loading dock area. Ventilation in such a building is usually considerable both to maintain air conditioning/heating as well as to provide ventilation for forklifts and similar equipment used in warehouse operations.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3b. A site-specific assessment of risk demonstrates that constituents in soil will have no significant adverse effects to human health because the Site is paved and accidental access to site soils is prevented. Any construction worker working at the Site will be prepared for exposure in their normal daily work.

Objections to Closure and Responses

According to the GeoTracker Closure Review page, the County objects to UST case closure because the source of contamination has not been identified.

RESPONSE: The source of the contamination is the former UST, which was reported in August 1987. In addition, the case meets all the Policy criteria.

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. Sacramento County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock

Lisa Babcock, P.G. 3939, C.E.G. 1235

5/20/13

Date

Prepared by: Kirk Larson, P.G.

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

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

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

<p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Nuisance as defined by Water Code section 13050 does not exist at the site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria:</p> <p>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:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p> <p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>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.</p> <p>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.</p> <p>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? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>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?</p> <p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>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).</p> <p>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)?</p> <p>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?</p> <p>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?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

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

Site Location/History

- The Site is located at 6700 Folsom Boulevard in Sacramento, California.
- The Site is bounded by an alley to the west, a parking lot to the north, a business to the east, and Q Street to the south. The surrounding land use is commercial.
- In August 1987, soil contamination was identified during the removal of three USTs.
- Four active monitoring wells have been installed and monitored irregularly; no data since 2010.
- A Site map showing the location of the former USTs, monitoring wells, and groundwater level contours is provided at the end of this closure summary.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system.
- Date reported: August 1987.
- Status of Release: USTs removed.
- Free Product: None reported.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	4,000	Gasoline	Removed	August 1987
2	3,000	Gasoline	Removed	August 1987
3	1,000	Gasoline	Removed	August 1987

Receptors

- GW Basin: Sacramento Valley – South American.
- Beneficial Uses: Municipal and Domestic Supply.
- Land Use Designation: None Specified. Aerial photograph available on GeoTracker show the land use is commercial in the vicinity of the Site.
- Public Water System: City of Sacramento Water District.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by CDPH within 250 feet of the defined plume. No other water supply wells were identified within 250 feet of the defined plume in the files reviewed.
- Distance to Nearest Surface Water: There is no identified surface water within 250 feet of the defined plume.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by interbedded and intermixed sand, silt and clay.
- Maximum Sample Depth: 50 feet below ground surface (bgs).
- Minimum Groundwater Depth: 36.25 feet bgs at monitoring well MW-2.
- Maximum Groundwater Depth: 40.20 feet bgs at monitoring well MW-1.
- Current Average Depth to Groundwater: Approximately 38 feet bgs.
- Saturated Zones(s) Studied: Approximately 36 – 49 feet bgs.
- Groundwater Flow Direction: Predominately to the south southeast with an average gradient of 0.002 feet/foot (September 2009).

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (07/14/2010)
MW-1	April 2004	34-49	38.77
MW-2	March 2006	30-45	37.37
MW-3	March 2006	31-46	38.42
MW-4	May 2008	30-45	38.14

Remediation Summary

- Free Product: No free product was documented in GeoTracker.
- Soil Excavation: Unknown volume.
- In-Situ Soil/Groundwater Remediation: No active remediation has been conducted.

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	NA
Ethylbenzene	NA	NA
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

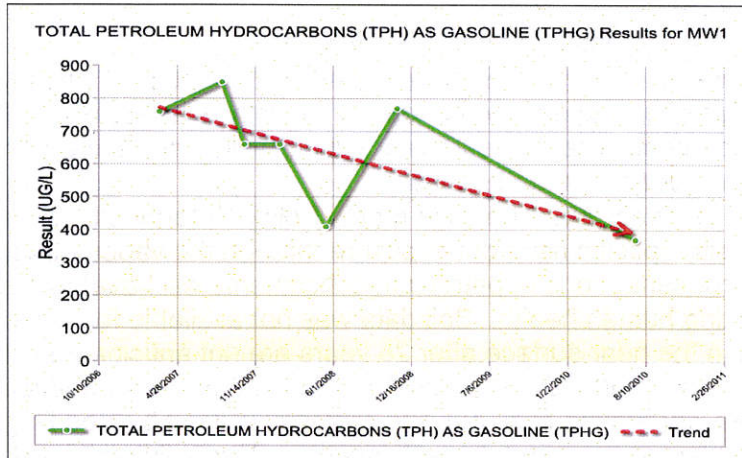
Sample	Sample Date	TPHg (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-Benzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)
MW-1	07/14/2010	370	<0.5	<0.5	<0.5	<1	<0.5	<5
MW-2	07/14/2010	<50	<0.5	<0.5	<0.5	<1	<0.5	<5
MW-3	07/14/2010	1,000	<0.5	<0.5	19	4.9	<0.5	<5
MW-4	07/14/2010	<50	<0.5	<0.5	<0.5	<1	<0.5	<5
WQOs	-	50	0.15	42	29	17	5	1,200^a

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
 MTBE: Methyl tert-butyl ether
 TBA: Tert-butyl alcohol
 WQOs: Water Quality Objectives, Region 5 Basin Plan
^a: California Department of Public Health, Response Level

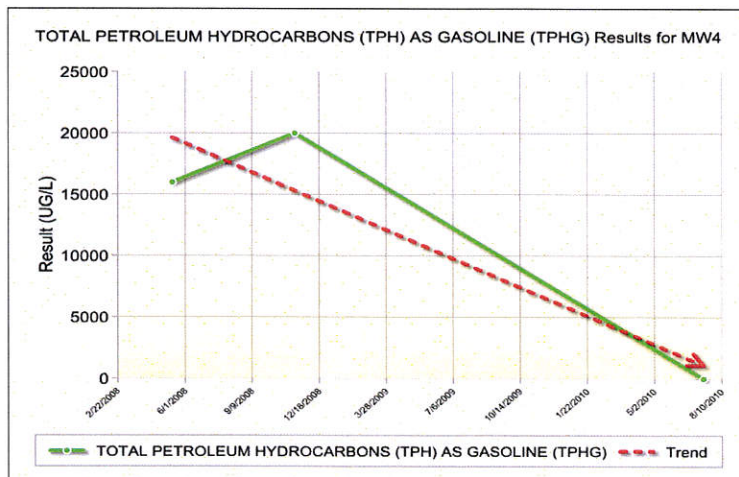
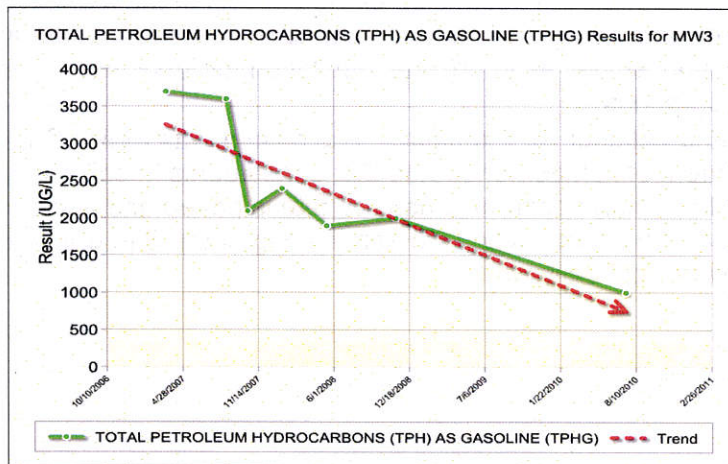
Groundwater Trends

There are more than 6 years of groundwater monitoring data for this Site. TPHg trends are shown below: Source Area (MW-1) and Downgradient (MW-3 and MW-4).

Source Area Well



Downgradient Wells



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: <100 feet long.
- Plume Stable or Degrading: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Specific Criteria: The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. No free product is present. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2b. A professional assessment of site-specific risk from exposure through the vapor intrusion pathway shows that maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. Soil data was not available for review, but remaining concentrations in the near-surface after 25 years are not anticipated to be significant. The former source area is outside the existing building in a driveway and loading dock area. The building is a warehouse-style building currently utilized by Red Dog Shred as a document shredding service and drop-off location. The building interior is accessed through a set of glass doors on the west side of the building for public access and a metal door and a roll-up door on the south side of the building in the loading dock area. Ventilation in such a building is usually considerable both to maintain air conditioning/heating as well as to provide ventilation for forklifts and similar equipment used in warehouse operations.
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