



California Regional Water Quality Control Board North Coast Region

Bob Anderson, Chairman



Linda S. Adams
Secretary for Environmental
Protection

www.waterboards.ca.gov/northcoast
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone: (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Arnold Schwarzenegger
Governor

FACT SHEET Underground Storage Tank Program Site Closure Process

March 27, 2009

The purpose of this Fact Sheet is to describe the site closure process used by the Regional Water Board (RWB) staff for Underground Storage Tank (UST) cases, and to provide the Responsible Party (RP) the types of information necessary to support a closure request. For UST cases regulated by Local Oversight Program (LOP) Agencies, the closure process may include additional requirements.

Site Closure

If an RP believes an UST case is ready for closure, a No Further Action Request Report should be submitted. The report is to summarize site history, site geology and hydrogeology, chemical data over time, potential receptors, beneficial uses, existing conditions, and include rationale supporting site closure. The rationale must include a finding about future impacts on water quality, human health, and the environment. If it is determined that ground water has not been impacted, evidence supporting this condition must be provided. In accordance with the California Underground Storage Tank Regulations (UST regulations), California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Sections 2725 (g) and 2721 (b), the UST site cleanups must comply with all applicable adopted state policies for water quality control, the applicable water quality control plan (Basin Plan), and all other applicable requirements.

No Further Action (NFA) Request Report

The purpose for a NFA Request Report is two fold: 1) provide a document upon which the regulatory agency may make an informed and objective decision regarding the NFA request and, 2) provide the RP with the site closure parameters which will be reviewed by the regulatory agency.

Closure Documentation

To verify that the site will not adversely impact water quality, human health, the environment, safety or other beneficial uses, the NFA request must be justified with

the information outlined below. Information to support site closure may vary with the complexity of the site, hydrogeologic conditions, the extent of contamination or other site specific conditions. Although the information outlined below is typically necessary for RWB staff evaluation of the NFA request, it is recognized that the less complex sites may not need to provide all of the information listed. The RP should provide justification for the omission of information considered unnecessary to support case closure. The NFA request must include signatures of registered professionals as required by the California Business and Professions Code.

1. Site History and Current Site Conditions:
 - Describe the size, age, condition, use, and type of tank(s) removed, piping, dispenser islands, and history of business operations and ownership;
 - Describe the size of the property in acres.
 - Describe the extent of the contaminant plume, if any;
 - Describe the estimated quantity of product released, if known, and date and evidence of the leakage, or other spills;
 - Describe source removal activities at the time of the tank system removal. Include soil and water samples collected and analytical data associated with evidence of the release;
 - Provide an area location map;
 - Provide a scaled site map showing former and existing tank systems, excavation and sample locations, subsurface utilities, buildings, streets, and any nearby surface waters.
2. Site Investigation and Remediation-Soil and Groundwater:
 - Identify all source areas and constituents of concern (COCs) associated with the releases.

- Report the volume of excavated soil disposed off-site.
 - Provide an estimated volume of total contaminant mass remaining in soil.
 - Provide tabulated results of all soil and groundwater sampling and analyses, including indications of sampling method, sampling dates, and detection limits.
 - Provide a summary of the remedial method(s) used to clean up the site. Include the duration of remedial activities.
 - Provide an estimated volume of contaminant mass remaining in groundwater.
 - Provide isoconcentration contour maps of COCs to define the lateral and vertical extent of contaminants remaining in soil and groundwater. The contour maps should present an estimated “zero line” of contaminant concentrations both on-site and off-site.
3. Site Geology and Hydrogeology-
- Provide a summary of all groundwater elevations and depths to water.
 - Provide the groundwater gradient direction and describe fluctuations over time.
 - Provide scaled site maps showing boring and monitoring well locations, and representative groundwater elevation contours.
 - Provide scaled maps showing potential sensitive receptors, including water supply wells and surface water, utility corridors, and other preferential pathways of exposure, within 1,000 feet of the site in consideration of potential sensitive receptors. The appropriate distance may be modified based on site specific factors.
 - Provide distances to water supply wells.
 - Provide boring logs and cross-sections to show site stratigraphy.
4. Case Closure Justification-
- If “Background” levels of COCs are unattainable for soil, address the criteria outlined in Title 27, Section 20400 (solid waste, criteria for disposal sites; concentration limits).
 - Provide a rationale why the conditions remaining at the site will not adversely impact water quality, human health, the environment and safety, or other current and future beneficial uses of water.
 - Provide an evaluation of the estimated cleanup time until water quality objectives (WQOs) are met, including trend analysis that demonstrates that the plume is decreasing or stable in size, and decreasing in concentration levels of

COCs. Trend analysis may be expressed in log scale or other manner for each COC to exhibit the timeframe for achieving WQOs.

5. Other Information-

- If models for risk assessments, and/or fate and transport are used, provide assumptions, parameters, calculations (Modeling is not required).
- Provide a list of technical reports used to support case closure.
- Provide any additional comments supporting NFA for the site.
- Provide all required information uploads into Geotracker.

UST NFA Letters

All regulatory agencies are required to issue a standard NFA letter when case closure is appropriate. That letter is described in Section 25296.10 of the Health and Safety Code. For the RWB, these letters are signed by the Executive Officer (EO). For UST sites overseen by the LOP Agency, the NFA letter (AKA: Remedial Action Completion Certificate) is signed by the program director.

UST NFA Notifications

For RWB lead sites, prior to issuing a NFA letter to the RP, RWB staff post a “Notice of Proposed No Further Action” on the RWB Website at http://www.waterboards.ca.gov/northcoast/public_notices/ and staff request the RP to distribute the notice to interested parties and contiguous landowners. A thirty day public comment period is provided to meet the public participation requirements of Section 2728, Chapter 16, Title 23, CCR.

UST Case Closure Non-concurrence

The RWB EO will provide written notice to RPs and/or LOP Agency (if applicable), if the EO non-concurs with NFA status. For LOP lead sites, RPs should consult with the LOP for any additional requirements. RPs are allowed to appeal the decision of the RWB staff directly to the State Board under SB 562. The appeal process is published on the State Board website at <http://www.waterboards.ca.gov>