

State Water Resources Control Board

UST CASE CLOSURE REVIEW SUMMARY REPORT

Agency Information

Agency Name: Ventura County Environmental Health Division (County)	Address: 800 South Victoria Avenue, Ventura, CA 93009
Agency Caseworker: Diane B. Wahl	Case No.: 98019

Case Information

USTCF Claim No.: 13768	Global ID: T0611101177
Site Name: J. E. Clark II Corp. – Telegraph	Site Address: 18115 E. Telegraph Road, Santa Paula, CA 93060
Responsible Party (RP): Jim Clark	Address: P. O. Box 72, Santa Paula, CA 93061
USTCF Expenditures to Date: \$186,359	Number of Years Case Open: 14

URL: https://geotracker.waterboards.ca.gov/regulators/screens/menu.asp?global_id=T0611101177

Summary

The Low-Threat Underground Storage Tank (UST) 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:

The Site is currently a bulk fuel facility with six active petroleum underground storage tanks (USTs) and has been used to dispense petroleum since the 1920's. An unauthorized leak was reported in April 1998 as part of investigation related to a request to abandon seven USTs in-place, which was granted. Since August 2006, four groundwater monitoring wells have been installed.

Approximately three cubic yards of contaminated soil has been excavated and disposed off-site.

According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents.

The petroleum release is limited to the shallow soil and groundwater. No public supply well regulated by the California Department of Public Health or surface water body is located within 250 feet of the defined plume boundary. No other water supply wells were 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 Santa Paula. 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 declining. Corrective actions have been implemented and additional corrective actions will not likely change the conceptual site model.

Any remaining petroleum hydrocarbon constituents do not pose 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: The case meets Policy Groundwater-Specific Criterion 1 by Class 1. The 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 is greater than 250 feet from the defined plume boundary.
- Vapor Intrusion to Indoor Air: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because Site is an active commercial petroleum fueling facility.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Residential/Commercial and the concentration limits for Utility Worker are satisfied. Site is paved and anticipated use is as a commercial gas station. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Objection to Closure and Response

The County objects to closure until soil borings are installed and soil samples collected to assess site conditions.

RESPONSE: The case meets the Policy criteria and does not pose a significant risk to human health, safety, or the environment.

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



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



Date

PREPARED BY: Hari Patel

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>Has secondary source been removed to the extent practicable?</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> <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.

<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 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 type="checkbox"/> 3 <input type="checkbox"/> 4</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>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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 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><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

- This Site is located at 18115 East Telegraph Road in Santa Paula and is an active commercial petroleum fueling facility.
- The Site is bounded by East Telegraph Road to the south, train tracks and an orchard to the north, commercial facilities to the east, and residences to the west.
- Site map showing the location of the former USTs, monitoring wells and groundwater level contours is provided at the end of this closure review summary.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source: UST system, under dispenser.
- Date reported: April 1998.
- Status of Release: USTs closed in place; replaced by USTs.
- Free Product: Not reported.

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/Removed/Active	Date
USTs				
1	20,000	Unknown	Temporary Closed	December 1998
2	6,000	Diesel	Removed	December 2012
3	6,000	Mineral Spirits	Removed	December 2012
4	6,000	Kerosene	Removed	December 2012
5	12,000	Gasoline	Removed	December 2012
6	12,000	Gasoline	Removed	December 2012
7	12,000	Gasoline	Removed	December 2012
8	15,000	Gasoline	Active	--
9	15,000	Gasoline	Active	--
10	15,000	Gasoline	Active	--
11	12,000	Diesel	Active	--
12	12,000	Diesel	Active	--
13	12,000	Diesel	Active	--
ASTs				
A1	Unknown	Unknown	Removed after fire	2007
A2	Unknown	Unknown	Removed after fire	2007
A3	Unknown	Unknown	Removed after fire	2007
A4	Unknown	Unknown	Removed after fire	2007
A5	Unknown	Unknown	Removed after fire	2007
A6	Unknown	Unknown	Removed after fire	2007
A7	Unknown	Unknown	Removed after fire	2007
A8	Unknown	Unknown	Removed after fire	2007
H1	Unknown	Unknown	Removed	Unknown
H2	Unknown	Unknown	Removed	Unknown
H3	Unknown	Unknown	Removed	Unknown

Receptors

- GW Basin: Santa Clara River Valley – Santa Paula.
- Beneficial Uses: Agricultural, Industrial Service and Process, Municipal, and Domestic Supply.
- Land Use Designation: Commercial.
- Public Water System: City of Santa Paula.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by California Department of Public Health within 250 feet of the defined plume boundary. No other water supply wells were identified within 250 feet of the defined plume boundary in files reviewed.
- Distance to Nearest Surface Water: There is no surface water body within 250 feet of the defined plume boundary.

Geology/Hydrogeology

- Stratigraphy: The Site is underlain by sand to 5 feet below ground surface (bgs) underlain by sandy gravels and cobbles to 50 feet bgs.
- Maximum Sample Depth: 80 feet bgs.
- Minimum Groundwater Depth: 52.30 feet bgs at monitoring well MW-4.
- Maximum Groundwater Depth: 63.60 feet bgs at monitoring well MW-2.
- Current Average Depth to Groundwater: Approximately 60 feet bgs.
- Saturated Zones(s) Studied: Approximately 55 to 80 feet bgs.
- Appropriate Screen Interval: Yes.
- Groundwater Flow Direction: Variable, westerly, with an average gradient of 0.007 feet/foot.

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (6/24/2012)
MW-1	August 2006	40-80	59.96
MW-2	February 2007	40-80	62.28
MW-3	February 2007	40-80	NA
MW-4	March 2008	35-75	58.70

Remediation Summary

- Free Product: None reported in GeoTracker.
- Soil Excavation: About 3 cubic yards of impacted soil were removed and disposed offsite.
- In-Situ Soil/Groundwater Remediation: None conducted according to GeoTracker.

Most Recent Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs [mg/kg (Date)]	Maximum 5-10 feet bgs [mg/kg (Date)]
Benzene	<0.005 (09/08/09)	<0.005 (09/08/09)
Ethylbenzene	0.08 (09/08/09)	0.0079 (09/08/09)
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	6/24/2012	<50	<1	<1	<1	<2	<2	<10
MW-2	6/24/2012	<50	<1	<1	<1	<2	<2	<10
MW-3	6/29/2010	294	<1	<1	<1	<2	<2	<10
MW-4	6/24/2012	<50	<1	<1	<1	<2	<2	<10
WQOs	-	--	1	150	300	1,750	5	1200^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, Regional Water Board Basin Plan

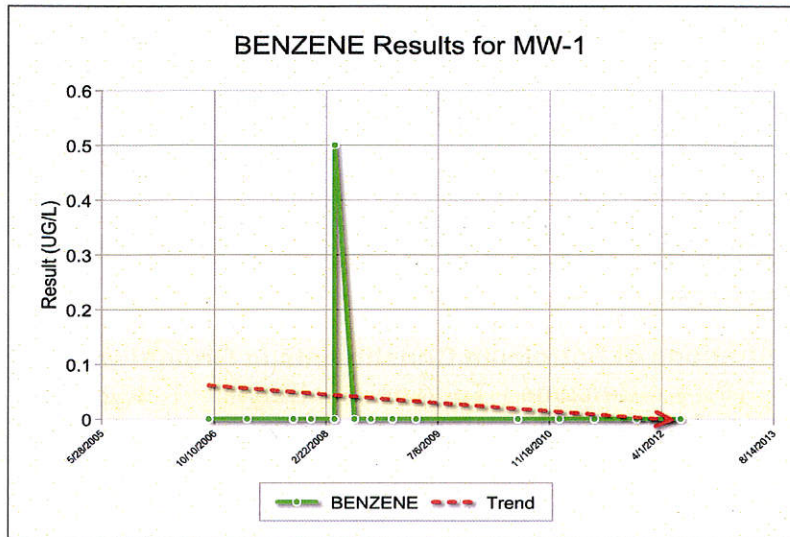
--: Regional Water Board Basin Plan has no numeric WQO for TPHg

^a: California Department of Public Health, Response Level

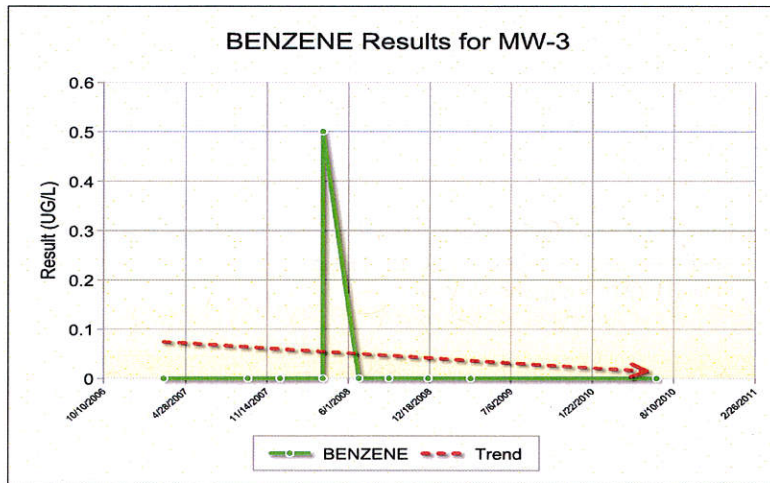
Groundwater Trends

Groundwater has been monitored regularly since 2006. Benzene trends are shown below: Source Area (MW-1 and MW-3) and Downgradient (MW-4).

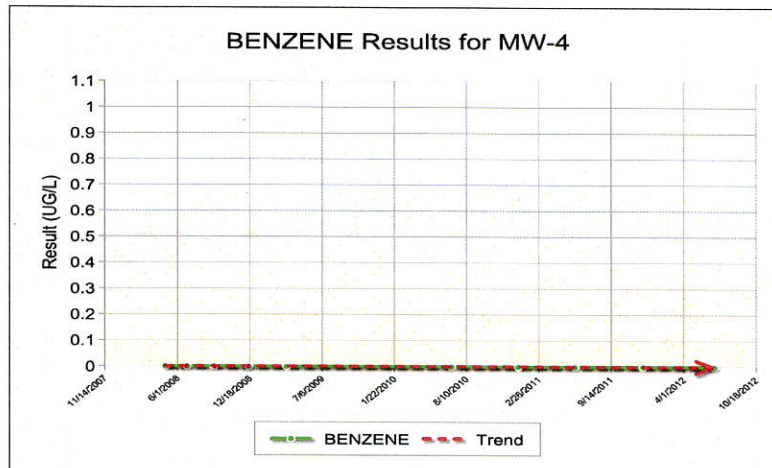
Source Area Well



Source Area Well

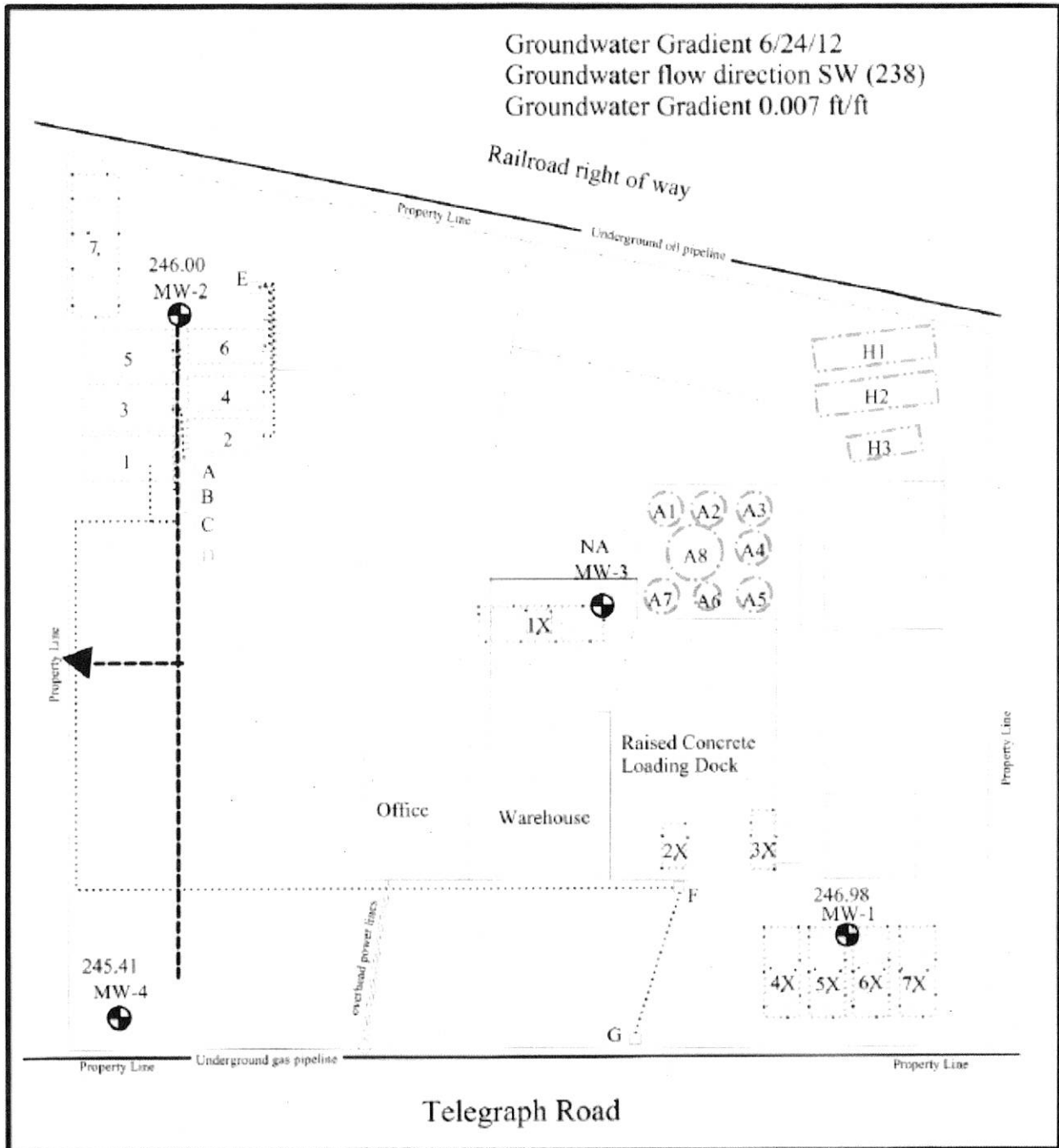


Downgradient Well



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, water quality objectives achieved in all wells.
- Plume Stable or Degrading: Yes.
- Contaminated Zone(s) Used for Drinking Water: No.
- Groundwater Risk from Residual Petroleum Hydrocarbons: The case meets Policy Groundwater-Specific Criterion 1 by Class 1. The 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 is greater than 250 feet from the defined plume boundary.
- Indoor Vapor Risk from Residual Petroleum Hydrocarbons: The case meets the Policy Exclusion for Active Station. Soil vapor evaluation is not required because Site is an active commercial petroleum fueling facility.
- Direct Contact Risk from Residual Petroleum Hydrocarbons: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Residential/Commercial and the concentration limits for Utility Worker are satisfied. Site is paved and anticipated use is as a commercial gas station. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.



MW-1 monitoring well
 Former UST abandoned in place
 Former AST, horizontal, removed
 Former AST, vertical, removed
 Current UST, active

Scale 1" = 30'

0 15 30

Groundwater Gradient Map Figure 2

J.E. Clark II Corp., Pacific Pride Petroleum
 18115 East Telegraph Road
 Santa Paula, California
 VCEHD-LUFT #C98019
 Geotracker # T0611101177

[REGULATORS HOME](#) | [LINK TO THIS MAP](#)

