

State Water Resources Control Board

UNDERGROUND STORAGE TANK (UST) CASE CLOSURE SUMMARY

Agency Information

Agency Name: Orange County Health Care Agency, Division of Environmental Health (Orange County)	Address: 1241 East Dyer Road, Suite 120 Santa Ana, CA 92705-5611
Agency Caseworker: Dan Weerasekera	Case No.: 95UT024

Case Information

UST Cleanup Fund (Fund) Claim No.: 12069	Global ID: T0605901859
Site Name: Former Mercury Rentals, Inc.	Site Address: 4664 Lincoln Avenue Cypress, CA 90630-2650 (Site)
Responsible Party (RP): Winton G. Kemmis Trust (Kemmis Trust) Attention: Ms. Lucinda A. Kemmis, Trustee	Address: 241 Via Sarasan Encinitas, CA 92024-5323
Fund Expenditures to Date: \$1,270,335	Number of Years Case Open: 24

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0605901859

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.

The Site contains a rental self-storage facility and a retail plaza in a mixed-use area consisting of commercial and residential properties. The existing self-storage and retail plaza were constructed in 1985 soon after the heavy equipment rental facility (Former Mercury Rentals, Inc. [Mercury]) relocated. The RP (i.e. Kemmis Trust) operated the storage facility until 1997. Fuel for the heavy equipment operations at Mercury was supplied from two diesel USTs, one gasoline UST, a motor oil UST, and a waste oil UST. Individual tank capacities are unknown, but the total capacity of the five tanks was reported to be 37,500 gallons (gal). The USTs were removed and taken off-site for disposal along with 16 cubic yards (cy) of contaminated soil.

The former Hansen Auto Towing (Hansen) facility, at 4620 Lincoln Avenue, is due west of the Site, separated by an alley. In the 1990s, corrective action of releases from two,

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2,000-gallon gasoline USTs was conducted on the Hansen property. An above ground storage tank (AST) was reported to have been formerly located about 300 feet south of Lincoln Avenue along the eastern boundary of the property, across the alley from the future location of the Mercury USTs. Previous owners of the former Hansen property and an adjacent lot included an oil refiner, multiple trucking companies, and a diesel engine service that operated for at least 25 years. The AST may have been used in all or some of these legacy operations. Soil data, the fingerprint analyses, the location and thicknesses of measurable free product, and recent photographic evidence of soil staining suggest the former AST and/or other unauthorized releases on the former Hansen property are sources for free product that mobilized and commingled with releases from the Site. The secondary soil source in the area of the former AST has not been remediated, whereas free product from Mercury releases have been removed to the extent practicable in the alley and at the Site.

Free product removal was conducted at the Site and in the alley from 1996 through March 2016 using skimmers, a vacuum truck, hand bailers, and absorbent socks. In 1999, a French drain system was installed in the alley immediately northwest of the former Mercury USTs to enhance free product recovery. A 5-day dual phase extraction pilot test was conducted in May 2007 that removed 37 gal of free product. Mobile dual-phase extraction (DPE) was conducted at the Site and in the alley using seven monitoring wells, where three of the wells were within or adjacent to the Mercury UST excavation. Mobile DPE was conducted intermittently from November 2008 through August 2010 and removed 152 gal of free product. During the last six months of DPE operation, less than 5 gallons of free product was recovered. A total of 986 gal of free product was recovered from the Site and the alley through Third Quarter 2016. In February 2011, a large-diameter auger was used to excavate 80 cy of contaminated soil from the alley. DPE and the auger excavation were conducted in the area between the former Mercury USTs, former Hansen USTs and former AST.

The contaminant plume that exceeds water quality objectives is less than 250 feet in length. Concentrations of benzene and methyl tert-butyl ether are far below the 1000 milligram per kilogram threshold in the Groundwater Media-Specific Criteria in the Policy in all monitoring wells. There are no groundwater or surface water receptors within 1000 feet of the Site.

Subslab soil gas measurements demonstrate that vapor intrusion does not pose a significant health risk to occupants of the retail plaza. The storage facility office building is estimated to be more than 100 feet from the plume indicating that there is no significant vapor intrusion threat. The use of the storage units at the site is the same as the use of storage sheds described in the U.S. Environmental Protection Agency's Vapor Intrusion Guidance¹ where both types of buildings are not intended for human

¹ *OSWER Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air*, OSWER Publication 9200.2-154, Office
(footnote continued on next page)

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occupancy. Accordingly, the vapor intrusion pathway for the storage units is incomplete.

All soil samples were below the commercial/industrial levels for benzene, ethylbenzene, and naphthalene in Table 1 of the Policy. The human health risks for current and future occupants posed by vapor releases from the former AST and/or other unauthorized releases on the Hansen property were evaluated using soil gas surveys in June and November 2018. The results² were provided to the Santa Ana Regional Water Quality Control Board that has oversight for cleanup activities at the former Hansen property.

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 at the Site do not pose significant risk to human health, safety, or the environment under current conditions. Further investigation and monitoring of the suspected off-Site releases by the current owner of the former Hansen property is in progress.

Rationale for Closure Under the Policy

- General Criteria – Site **MEETS ALL EIGHT GENERAL CRITERIA** under the Policy.
- Groundwater Media-Specific Criteria – Groundwater Media-Specific Criteria – Site meets the criteria in **Class 5**. The regulatory agency determines, based on an analysis of Site-specific conditions that under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health, safety, and to the environment and water quality objectives will be achieved within a reasonable time frame.
- Petroleum Vapor Intrusion to Indoor Air – Petroleum Vapor Intrusion to Indoor Air – Site meets **Criteria 2 (b)**. A Site-specific risk assessment for the vapor intrusion pathway was conducted under the policy and demonstrates that human health is protected to the satisfaction of the regulatory agency.
- 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.

Recommendation for Closure

of Solid Waste and Emergency Response, U.S. Environmental Protection Agency, June 2015.

² *Soil Vapor Survey and Well Destruction Report and Request for Case Closure, Former Hansen Auto Tow, 4620 Lincoln Avenue, Cypress, California, Paloma Environmental Services, Inc., December 10, 2018*

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The corrective action performed at this Site ensures the protection of human health, safety, 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.



Matthew Cohen, PG No. 9077
Senior Engineering Geologist



July 2, 2019
Date