Final

July 11, 2011

Review of
Leaking Underground Storage Tank Cases
Not in Cleanup Fund and Open Over 15 Years

San Joaquin County
Local Oversight Program

Prepared as in-kind task as part of Cooperative Agreement LS-96934701-1 between USEPA Region 9 and the California State Water Resources Control Board

Table of Contents

Executive Summary

The Draft version of this report was submitted on August 3, 2010 and on June 21, 2011 the U.S. Environmental Protection Agency (USEPA) Region 9 contractor, Sullivan International Group, Inc., contacted the agency via telephone on June 21, 2011 to discuss the draft report and their next steps for each case. During the meeting, barriers to moving cases to closure were discussed. The agency discussed how the cities and counties are encountering budget cuts and there is a lack of overall funding which makes cleanup progress for county and city sites a bit slower than other sites. As recommend by USEPA, the agency agreed to request that the Regional Quality Control Board (RWQCB) provide interim assistance with the county and city sites. Another barrier mentioned by the agency is recalcitrant RPs; three of the sites had unresponsive RPs. The agency also acknowledges that uploading documentation to GeoTracker is a problem for a few of their sites and they will continue to work to ensure that the Responsible Parties (RPs) and their consultants do a better job of uploading the necessary documentation.

One of the sites, STOCKTON MAINT STN (SHOP 10) (T0607700371), has been closed since the last review. Additionally, there are four sites that are on track to be closed within one-year (RMC Pacific Materials, Beacon #419, Beacon #641, and Holly Sugar). The agency was having difficulty getting one RP to complete the last few tasks to close a site, STOCKTON TRUCK TERMINAL, so they transferred the case over to the RWQCB.

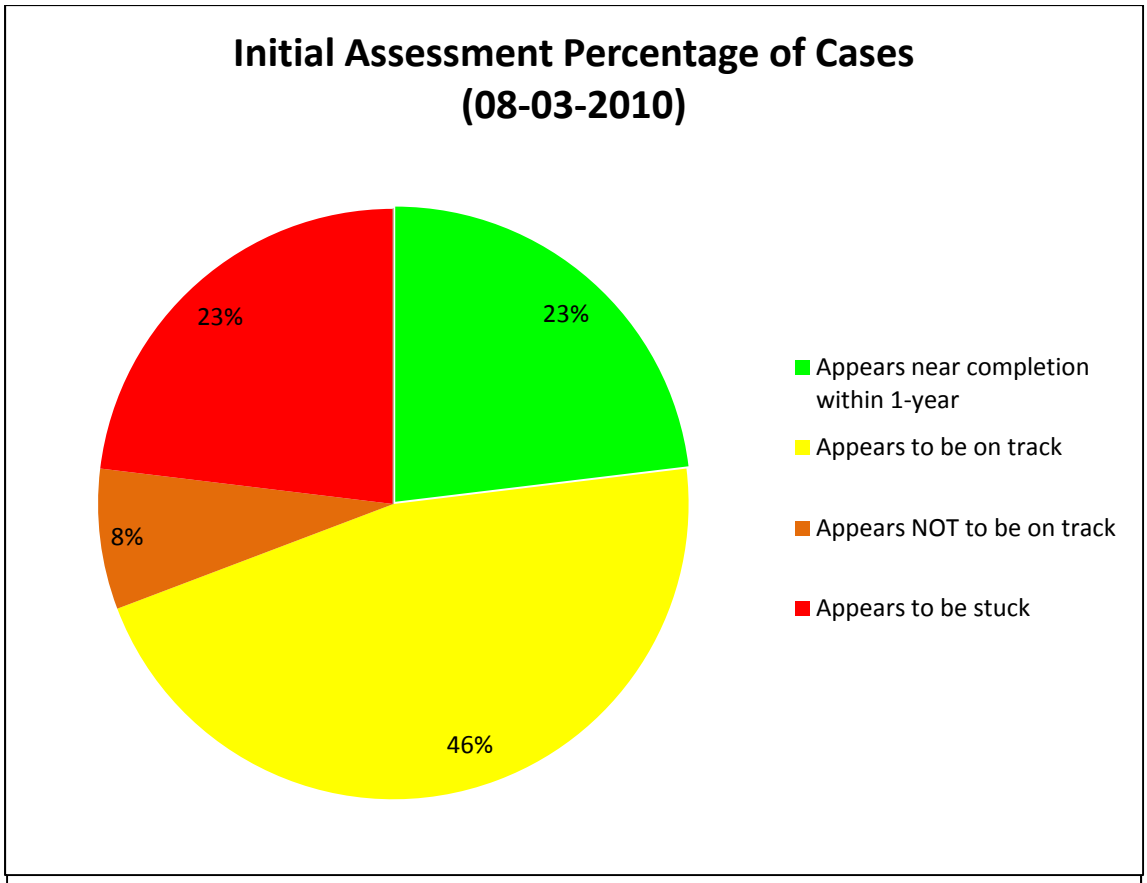
San Joaquin County LOP

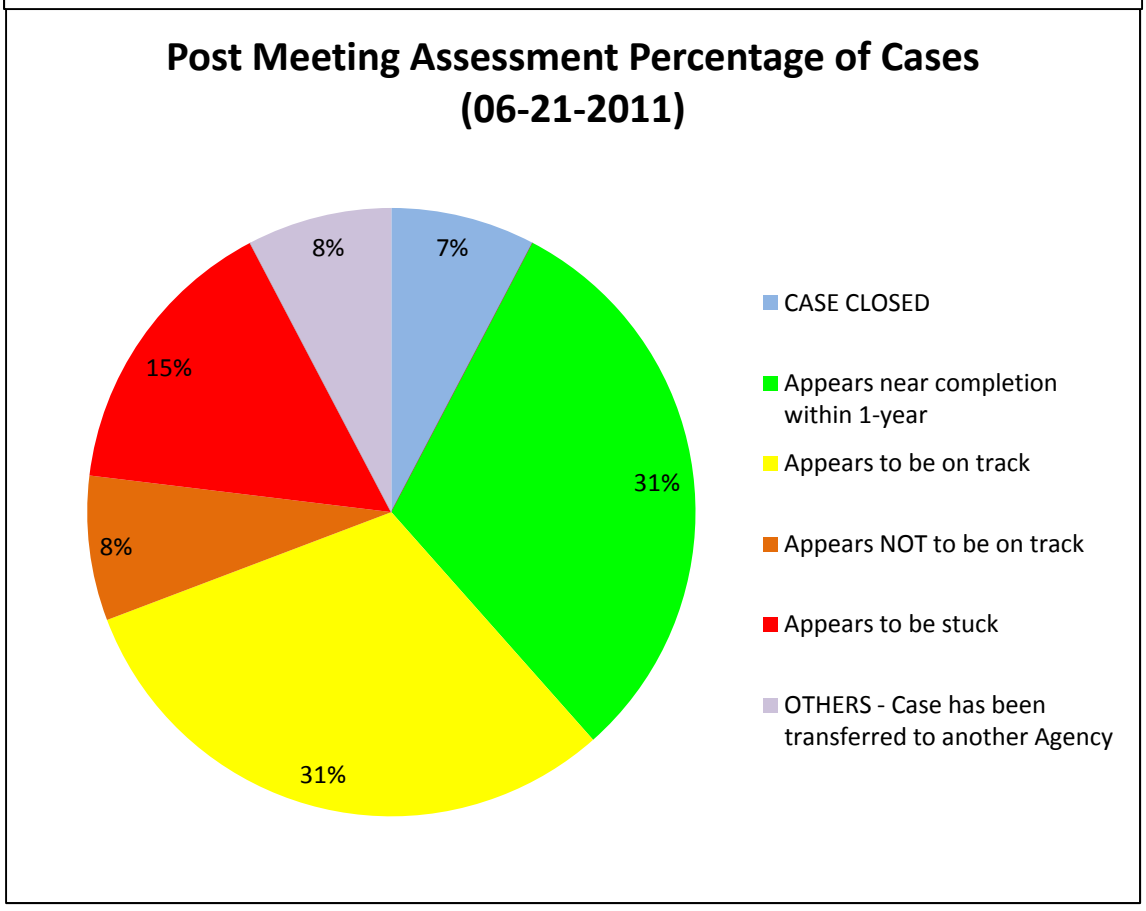
Apparent Case Status – Initial and After

TOTAL NUMBER OF CASES REVIEWED = 13
NUMBER OF ACTIVE LUST CASES ON NOVEMBER 1, 2010 = 190 CASES
DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON AUGUST 3, 2010
RESPONSE/MEETING WITH AGENCY ON JUNE 21, 2011

APPARENT STATUS OF CASES REVIEWED – INITIAL REVIEW AND AFTER MEETING TO DISCUSS CASES

Apparent Case Status	Initial Assessment Number of Cases (08-03-2010)	Post Meeting Assessment Number of Cases (06-21-2011)
CASE CLOSED	0	1
Appears close to completion	0	0
Appears near completion within 1-year	3	4
Appears to be on track	6	4
Appears NOT to be on track	1	1
Appears to be stuck	3	2
Unable to determine (Insufficient information in GeoTracker)	0	0
NOT FEDERAL UST CASE	0	0
OTHERS - Case has been transferred to Regional Board	0	1


Initial Assessment Percentage of Cases
(08-03-2010)
23%
23%
8%
46%
Appears near completion within 1-year
Appears to be on track
Appears NOT to be on track
Appears to be stuck


Post Meeting Assessment Percentage of Cases
(06-21-2011)
8%
7%
15%
31%
8%
31%
CASE CLOSED
Appears near completion within 1-year
Appears to be on track
Appears NOT to be on track
Appears to be stuck
OTHERS - Case has been transferred to another Agency

CASE REVIEW SUMMARY TABLE
SAN JOAQUIN COUNTY LOCAL OVERSIGHT PROGRAM

ESTIMATED STATUS IN THE CLEANUP PIPELINE?	CHANGE IN STATUS IN THE CLEANUP PIPELINE (BASED ON TELECONFERENCE MEETING) ON 06-21-2011	SITE NAME (CASE LEAD AGENCY: SAN JOAQUIN COUNTY LOP)	GLOBAL ID	CASE WORKER	PRIMARY COC (In GeoTracker)	APPARENT TYPE OF RP	RELEASE DATE	DISCUSSION NOTES FROM MEETING/CALL (06-21-2011)	AGENCY COMMENTS (06-21-2011)	NEXT STEPS FOR AGENCY
Appears near completion within 1-year	Closed on 09/24/2010	STOCKTON MAINT STN (SHOP 10)	T0607700099	LOR	Gasoline	G - Government Entity (include School, Hospital, Utility)	10/5/1988	This Site was closed on 09/24/2010	Site Closed	Complete closure process in 1-year (includes well decommission)
Appears near completion within 1-year	Appears near completion within 1-year	RMC PACIFIC MATERIALS	T0607700371	HAR	Multiple	I - Industry (Railroad, Steel etc)	1/11/1990	The consultant should be preparing a closure report soon. Caseworker will talk to consultant about uploading their documents to GeoTracker. This case will be closed after closure report is complete, caseworker reviews the closure report, and the wells are decomissioned. The caseworker does believe this case will be closed within one year.	Closure rpt in prep	Complete closure process in 1-year (includes well decommission)
Appears near completion within 1-year	Appears to be stuck	TRACY DISPOSAL SERVICE	T0607700398	LOR	Gasoline	G - Government Entity (include School, Hospital, Utility)	6/4/1990	The caseworker said that he believes this is a city site and not a county site and that the underlying problem is that the city and county are having budget problems and they are focused on other higher priority items. In response to Joel Coffman's question regarding if the agency ever take cases to the District Attorney (DA) or refer the cases to Regional Board (RB): the caseworker replied that they haven't actively involved the DA for re-enforcement. The caseworker did say that the agency would look into utilizing the RB for interim assistance by having them write letters to the RP.	No response to directives	Ensure RP compliance (includes identify RP, enforcement, EAR account etc)
Appears to be on track	Appears to be on track	NOMELLINI PROPERTY	T0607700221	MIC	Gasoline	I - Industry (Railroad, Steel etc)	9/29/1988	The Dual Phase Extraction Remediation System is still running and it has been successfully remediating contaminants. This case is Still on Track.	--	Continue current remediation until low-risk criteria is met
Appears to be on track	Appears to be on track	U-HAUL STORE #70950	T0607700249	MIC	Gasoline	S - Small Private Business	1/13/1989	The caseworker believes that they are approaching the end of the soil vapor extraction phase and that additional assessment is warranted at the site. He agrees that this case is on Track.	Some additional assessment required and recently directed	Continue current remediation until low-risk criteria is met
Appears to be on track	Appears to be on track	CAL TRANS MAINTENANCE YARD	T0607700546	LOR	Gasoline	G - Government Entity (include School, Hospital, Utility)	1/24/1990	The caseworker said that the agency conditionally approved the remedial action plan and that there was a recent gw monitoring event in March 2011. The consultants have not done any work yet as far as getting the remediation system in place. The caseworker said that work is progressing but it is just at a slow pace.	WP for SVE and IAS recently approved, awaiting implementation.	Continue current remediation until low-risk criteria is met

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Appears to be on track	Appears near completion within 1-year	BEACON #419	T0607700481	MIC	Gasoline	Z - Major Oil Company	5/29/1991	The caseworker indicated that he believes that the site might be closeable within one year, but it depends on the RP and the consultant in terms of how fast they provide necessary documents and conduct the work. He mentioned that he will be meeting with the RP of the site on Monday, June 27, 2011 in which he will remind the RP that his consultants need to upload all the documents to GeoTracker.	Site in rebound testing and a soil gas investigation for risk assessment has been proposed and will be approved. Process may take more than a year depending on how rapidly work and evaluation is implemented.	Complete closure process in 1-year (includes well decommission)
Appears to be on track	Appears to be on track	BEACON #474	T0607700482	MIC	Gasoline	Z - Major Oil Company	5/29/1991	The caseworker indicated that the RP for Beacon #474 is a major oil company and that additional characterization is necessary. Additional vapor intrusion evaluation is necessary and the agency wants to make sure that the plume is not migrating at depth. The caseworker noted that the site is located close to a school. In regards to the SCM for the site, the caseworker noted that the consultant did cover all essential elements of SCM in their risk assessment that they provided in April 2011. The caseworker said that he would talk to the RP again about having their consultant upload all necessary documentation into GeoTracker.	Site in rebound testing and a soil gas investigation for risk assessment has been proposed and will be approved. Process may take more than a year depending on how rapidly work and evaluation is implemented.	Push for additional/alternate remediation (current remediation ineffective)
Appears to be on track	Appears near completion within 1-year	BEACON #641	T0607700492	MIC	Gasoline	Z - Major Oil Company	7/16/1991	The NFAR letter that the consultant submitted on 05/20/2011 was preliminary reviewed by one caseworker and the assigned caseworker will review within a month. The agency believes that this case is closeable within one year.	NFAR received, review pending	Complete closure process in 1-year (includes well decommission)
Appears NOT to be on track	Appears NOT to be on track	HUMAN SERVICES AGENCY	T0607700218	LOR	Multiple	G - Government Entity (include School, Hospital, Utility)	9/8/1988	The caseworker indicated that recent work has occurred at the site such as two groundwater monitoring events in January and in May 2011. However, there has been no documents uploaded to GeoTracker. The caseworker does admit that the RP needs to improve on getting reports into GeoTracker. The Status will remain as "Appears NOT to be on track" until documents are uploaded to GeoTracker.	Add'l UST removed in 10/10, gw monitored in 1/11 and 5/11, reports not on GeoTracker. Gov agency with limited funds available.	Update missing GT information (data, report, unassigned caseworker etc.)
Appears to be stuck	Appears near completion within 1-year	HOLLY SUGAR	T0607700096	HAR	Gasoline	I - Industry (Railroad, Steel etc)	11/18/1985	A low-risk closure summary was submitted by the consultant on 06/09/2011. The caseworker believes this case is closeable within one year.	30-day closure notification letter to Regional Board is in preparation.	Complete closure process in 1-year (includes well decommission)

CASE REVIEW SUMMARY TABLE
SAN JOAQUIN COUNTY LOCAL OVERSIGHT PROGRAM

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Appears to be stuck	OTHER--Transferred to Regional Board	STOCKTON TRUCK TERMINAL	T0607700510	HAR	Other	U - Unknown	5/4/1987	This case was transferred to the Regional Board (RB) as the case was close to closure but the RP wouldn't do the last few items recommended by the agency so the agency requested that the Regional Board get involved to enforce that the last few requested items be implemented.	Site Transferred to Regional Board	Ensure RP compliance (includes identify RP, enforcement, EAR account etc)
Appears to be stuck	Appears to be stuck	BOYD SERVICE CENTER	T0607700728	LOR	Gasoline	G - Government Entity (include School, Hospital, Utility)	12/13/1995	The caseworker agrees that this case is stuck. The site has been poorly characterized and the RP and consultants are non-responsive. The agency is considering transferring the case over to the Regional Board (RB) and will discuss this with them. There are nine municipal wells located near the site.	Progress is slow, but is moving; gov agency has limited funds.	Push for additional/alternate remediation (current remediation ineffective)

Attachment 1:

Case Review Power Point Slides from Draft Report

The contents of this attachment are provided in electronic format only.

STOCKTON MAINT STN (SHOP 10) (T0607700099)

1603 B ST S., STOCKTON, CA 95206

Case Age: 22 Years

RP Identified by Regulator: California Dept. of Trans.

Primary COC: Gasoline

Current Land Use: Administrative offices and storage/maintenance of state vehicles/HWY maintenance equipment.

OPEN - VERIFICATION MONITORING

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - *CASE #: 1018*
CASEWORKER: LORI DUNCAN - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - *CASE #: 390135*
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

•MWs were installed in different phases of work and the GW elevation has fluctuated greatly rendering the first set of wells unable to provide groundwater to sample.
•Site initially started with high levels of contamination, but now ready for closure after 4 years of soil vapor extraction and closure approved by agency.
•Closure is pending MW decommissioning.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700099

Assessment last 5 years

- Groundwater monitoring ongoing as of 2Q2009
- Confirmation borings advanced in 9/2009

Remediation last 5 years

- AS/SVETS system installed in 12/2005, and operated through 6/2009
- Air sparge component of system began 6/2006

Assessment older than 5 years

- Monitoring wells installed in 1987 & 1994. Monitoring has been ongoing since 1987.
- Soil gas survey conducted in 1988
- Site investigation conducted 1994
- SVE test conducted 1996
- Human Health Risk Assessment conducted 1999
- Groundwater study conducted 2000

Remediation older than 5 years

- USTs removed in 1989

IMPEDIMENTS TO CLOSURE T0607700099

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *Monitoring wells cannot be abandoned until there is a determination that no further action is required at this site.*

BENEFITS OF ADDITIONAL WORK

Other - *Removal of potential conduits by destruction of onsite wells.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

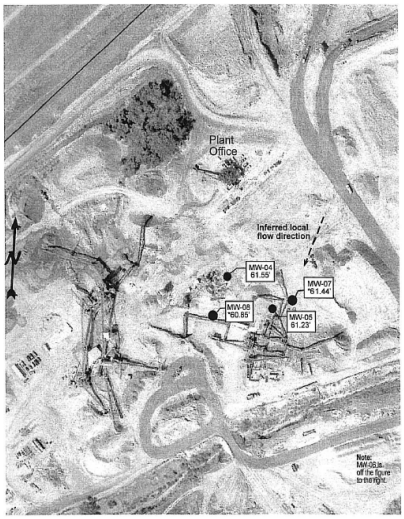
SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	see data and reports submitted to geotracker

Review Conclusions T0607700099

- Levels in groundwater are now down to ND for most contaminants in most wells and are below action levels where detected. EDF data in GeoTracker since 2002.
- Soil is still impacted with TPHd at up to 640 mg/kg, but the site is capped with asphalt and concrete, and this is generally a less mobile contaminant.
- Case closure summary submitted by the LOP to the Regional Board in 3/2010 and given 30 days to respond if they did not concur with closure.
- Agency requested statement of property ownership and permit for application for destruction of all groundwater monitoring wells, but no due date was specified.
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines? Impediment to closure is MW decommissioning; close case? Case seems near closure now!*

RMC PACIFIC MATERIALS (T0607700371)

30350 TRACY BLVD S, TRACY , CA 95376



Case Age: 20 years

Primary COC: Diesel, Other Solvent or Non-Petroleum Hydrocarbon

RP Identified: RMC Lonestar

Current land use: Commercial – Kerlinger Aggregate Facility

OPEN - REMEDIATION

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1737
CASEWORKER: HARLIN KNOLL - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390476
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

- Site history not documented in limited reports found on GT.
- Per regulator, site ready for closure, but RP has not responded to 8/2009 inquiry.
- Associated Land Disposal Site in GT also with no documents or history, **KERLINGER PLANT - LANDFILL (L10008312863).**

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700371

Assessment last 5 years

- Quarterly GWM Reports submitted in GT from 2004-2005
- Data for 3Q2009 in GT, no other submittals for this quarter
- Site history not documented in reports found on GT

Remediation last 5 years

- Site history not documented in reports found on GT

Assessment older than 5 years

- Remedial Soil/GW investigation WP dated 2/2004 in GT (references Preliminary Site Assessment Report dated 4/2002)

Remediation older than 5 years

- Site history not documented in reports found on GT

IMPEDIMENTS TO CLOSURE T0607700371

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Incomplete Conceptual Site Model (CSM) - *needs to be completed*

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *ESL comparisons need to be completed*

GROUNDWATER IMPACTS

Groundwater Impacted Above Background - *yes, diesel impact* Groundwater Impacted Above Other Cleanup Goal - *diesel above objective*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *MWs active and will be decommissioned when site closure is granted*

BENEFITS OF ADDITIONAL WORK

Restore Beneficial Uses - *return ground water to its natural state before use* **SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT**

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	concentrations declining

Review Conclusions T0607700371

- Site History section in GT indicates soil/GW investigation is complete, concentrations ND, and a closure report is pending. Only EDF (no report) for Q3-2009 in GT – confirms NDs for all concentrations. Wells are not mapped in GeoTracker.
- Closure review dated 7/2009 indicates ESL comparisons need to be completed and incomplete site conceptual model as impediments to closure.
- Email request from regulator for GW sampling status dated 8/26/2009. No response from RP.
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines? Aggressively enforce ESI compliance and closure report? Close with monitoring wells in place? Site looks closeable within 1 year.*

TRACY DISPOSAL SERVICE (T0607700398)

99 6TH ST W, TRACY , CA 95376

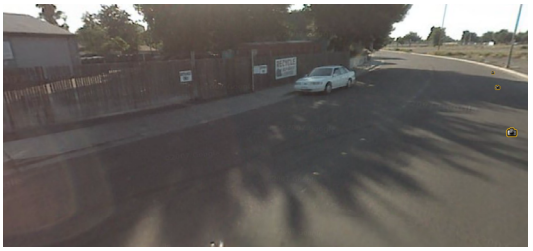
Case Age: 20 years (actually 25 years old)
Primary COC: Gasoline
RP Identified: City of Tracy
Current land use: Commercial

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 2183
CASEWORKER: LORI DUNCAN - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390510
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

- USTs removed in 1985 and locations over-excavated in 5/1990. Limited regulatory oversight and enforcement.
- Former UST location later became a portion of 6th Street.
- Limited regulatory oversight and no activities from 1990 to 2003 and from 2003 to 2008 – quarterly sampling began 12/2008.
- No remedial activities.
- Closure report requested, but non-responsive RP.
- Government RP; funding issue?



NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700398

Assessment last 5 years

- MWs installed 12/2008 and quarterly sampling required until trends established
- Limited Phase II 4/2009

Remediation last 5 years

- None

Assessment older than 5 years

- Soil samples collected 5/1990
- Site Investigation: soil and grab GW samples collected 2/2003

Remediation older than 5 years

- USTs removed 1985
- Soil excavation of former UST area 5/1990

IMPEDIMENTS TO CLOSURE T0607700398

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *Potential risk from soil vapor intrusion has not been addressed.*

GROUNDWATER IMPACTS

Other - *The monitoring wells are new at this site, contaminant trends have not been established.*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *Monitoring wells cannot be abandoned until there is a determination that no further action is required at the site.*

BENEFITS OF ADDITIONAL WORK

Protect Designated Beneficial Uses - *The Basin Plan designates all waters of the State to be potentially beneficial.*

Restore Beneficial Uses - *Per the Basin Plan, the groundwater at this site must be restored to its natural state.*

Protect Human Health - *Future risks to human health must be determined*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	See data and reports submitted to geotracker.
Indoor Air (Residential or Commercial)	Undetermined	see above

Review Conclusions T0607700398

- Limited regulatory oversight and enforcement. Many years between activities:
  - USTs removed in 1985 and over-excavated in 1990.
  - Site investigation in 2003 (13 years after over-ex).
  - Ongoing GW sampling began 12/2008.
  - No remedial activities conducted.
- Regulator submitted a request for a closure summary report in correspondence dated 9/24/2009 due to ND for all constituents. Second notice sent 3/3/2010 with due date of 3/10/2010. Non-responsive RP; government entity RP, possible funding issues?
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines? Government RP, funding issue? Site appears ready for closure within 1 year.*

NOMELLINI PROPERTY (T0607700221)

1045 CHARTER WAY W, STOCKTON , CA 95205

Case Age: 22 years
Primary COC: Gasoline
RP Identified by Regulator: Ultramar
Current land use: Commercial - Construction

Possible Reasons Why This Case Is So Old

- Periodic soil investigations and quarterly sampling since 1993, now semi-annual. EDF data on GeoTracker since 2003.
- Remediation feasibility tested in 1995, installation completed 11/1998, remediation began 2000 to 2005 (determined effective and operated to maximum potential.)
- Residual contamination still present and further remediation approved 2009 and now ongoing.

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1779124
CASEWORKER: MICHAEL INFURNA - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390301
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700221

Assessment last 5 years

- Soil/GW investigation 2/2004
- Soil/GW investigation 6/2006 following remediation
- Assessment and ongoing quarterly GW monitoring since 1993; recently changed to semi-annual
- Additional wells installed 11/2008 and soil samples collected
- Site conceptual model dated 12/2008
- Initial remedial report 4/2010

Remediation last 5 years

- Based on 7/2009 GW report, dual-phase extraction approved 5/2009
- DPE operated from 10/2009-1/2010 at approximately 46.5% of potential due to malfunctions and sediment infiltration

Assessment older than 5 years

- Soil/GW sampling from 1989-1994
- GW sampling since 1991

Remediation older than 5 years

- UST removal and over-excavation 1988
- Remedial pilot test 1995 and regulator concurred in 6/1996 - SVE/air sparging began 2/2000 to 2005, hand-bailed free product

IMPEDIMENTS TO CLOSURE T0607700221

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *soil vapor intrusion evaluation not completed yet*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *needed to verify effectiveness of remediation*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *to continue to reduce gw contam*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	elevated concentrations of dissolved petro remain

Review Conclusions T0607700221

- Ongoing sampling since 1989 and remediation occurred 2000 to 2005 – elevated levels still detected and additional remedial actions taken:
  - Corrective Action Plan approved 5/12/2009 for further remediation and regulator requested additional site characterization.
  - Remediation system installation, start-up, and initial operations report submitted 4/2010. DPE operated from 10/2009-01/2010 at 46.5% potential, but quantity of mass (water and vapor) removed justifies the continuation of the DPE system.
  - System malfunction due to sediment infiltration of one well. Consultant recommended modifications and indicated will include the installation of additional DPE well construction in the required work plan to continue the lateral and vertical delineation of impacted soil and groundwater.
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines for continued site assessment and updating of conceptual site model? Case appears to be on track with chosen remedial action.*

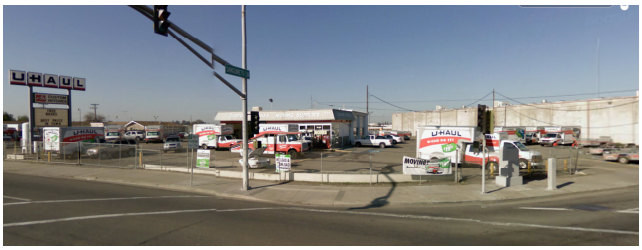
U-HAUL STORE #70950 (T0607700249)

2701 WILSON WAY N, STOCKTON , CA 95205

Case Age: 21 years
RP Identified by Regulator: Americo Real Estate Company
Primary COC: Gasoline
Current Land Use: U-Haul Store

Possible Reasons Why This Case Is So Old

- No remedial activities until 2002 and ongoing remediation began 9/2008.
- Drinking water well impacted and properly destroyed 9/2005.



NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700249

Assessment last 5 years

- Quarterly GW sampling since 2005; now semi-annual
- Soil/GW Investigation 3/2006
- Preliminary SCM dated 12/2006
- SCM updated 1/2010

Remediation last 5 years

- Remedial feasibility testing began 11/2002
- RAP dated 4/2007
- Approved SVE and in situ air sparging in 2007 and began 11/2008

Assessment older than 5 years

- Preliminary Soil/GW Site Investigation 1991
- Quarterly GW monitoring 5/1992
- Soil/GW assessment in 1993
- Further soil/GW assessment in 1995
- GW monitoring from 11/1994-9/1997
- Soil Investigation 1/2000
- Soil/GW Investigation 2003

Remediation older than 5 years

- USTs removed 08/1990

IMPEDIMENTS TO CLOSURE T0607700249

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *soil vapor intrusion evaluation not completed.*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *needed for evaluation of remedial effectiveness.*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *needed to reduce mass*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	elevated levels remain.

Review Conclusions T0607700249

- Many Soil/GW investigations conducted since 1991 and EDF data in GeoTracker since 2001. Ongoing sampling of 33 MWs; now semi-annual.
- No remedial activities until feasibility testing began in 2002 and RAP submitted in 2007; soil vapor extraction and air sparge remediation began 11/2008 to present.
- Updated conceptual site model submitted 1/2010: vapor extraction removed approximately 35,000 pounds of petroleum hydrocarbons and the effectiveness of the air sparge system is demonstrated by the observed reduction of dissolved phase hydrocarbons in the shallow GW over the remedial period. Consultant recommended continuing remediation, vapor sampling, and groundwater monitoring.
- Closure review dated 7/2009 indicates that soil vapor intrusion evaluation has not been completed and elevated levels remain in groundwater. An evaluation of risk to sensitive receptors may need to be expanded. For example, it was not stated that a residential neighborhood is located 300-ft east and southeast , with an average groundwater flow direction to the north, and how this relates to the risk of vapor intrusion.
- Activity in GeoTracker shows the regulator is actively managing site. No technical response by regulator in GeoTracker since 7/2009 groundwater monitoring reduction requirement, but all ESI submittals "received" in GeoTracker indicating that the regulator is manually approving submittals and not "auto-receiving."
- *Discussion: Next step – how to move this case toward closure? Does updated conceptual site model include sufficient vapor intrusion assessment? Current system appears to be effectively reducing the contaminates from the subsurface.*

CAL TRANS MAINTENANCE YARD (T0607700546)

1604 B ST S, STOCKTON , CA 95206

Case Age: 20 years
Primary COC: Gasoline
RP Identified: CA DEPT OF TRANSPORTATION
Current land use: Not changed

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP *(LEAD)* - *CASE #: 10193*
CASEWORKER: LORI DUNCAN - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - *CASE #: 390708*
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

•No activities from 1989 to 1993 site investigation and quarterly sampling since 1993. EDF data in GeoTracker since 2002.
•GW level rose and submerged well screens in three wells. Four new wells installed 6/2009.
•MNA analyzed in 2007-2008, but no other remedial activities.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700546

Assessment last 5 years

- Ongoing sampling
- GW level risen and well screens submerged; 3 wells destroyed and 3 new wells installed 7/2008
- CSM dated 1/28/2009

Remediation last 5 years

- GW analyzed for MNA between 3/2007-5/2008

Assessment older than 5 years

- Soil samples collected 1989
- Soil/GW Site Investigation began 1992, MWs installed 1992-1996
- Quarterly sampling since 1992

Remediation older than 5 years

- USTs removed 1989
- Another UST removed 1993
- SVE wells installed 1992, but no documentation of extraction activities

IMPEDIMENTS TO CLOSURE T0607700546

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Extent of Contamination Has Not Been Determined - *Groundwater contamination is still being defined. All site wells had become flooded, new wells have been installed to appropriately monitor the shallow groundwater; a report of the installation and first sampling analyses is pending.*

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *The potential impact from vapor intrusion has not been addressed.*

GROUNDWATER IMPACTS

Groundwater Impacted Above Other Cleanup Goal - *TPHg =5,100 ppb, benzene =11 ppb, MtBE =290 ppb, 1,2-DCA =67 ppb*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *Monitoring wells cannot be abandonded until there is a determination that no further action is required at the site.*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *Remediation is pending final definition.*

Protect Designated Beneficial Uses - *The Basin Plan designates all waters of the State to be potentially beneficial.*

Restore Beneficial Uses - *Per the Basin Plan the groundwater must be restored to its natural state.*

Protect Human Health - *Future risks to human health must be determined.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	see data and reports submitted to geotracker
Indoor Air (Residential or Commercial)	Undetermined	see above

Review Conclusions T0607700546

- The groundwater level rose and submerged three well screens and as a result, the wells were destroyed and four new wells were installed 6/2009 to accurately evaluate shallow GW.
- No active remediation (discussion of two SVE wells installed, but no mention of operation) other than MNA data from 3/2007-5/2008 suggesting active biodegradation of petroleum hydrocarbons through MNA is occurring.
- Closure review dated 3/2010 indicates remediation is pending final (contaminant) definition.
- Agency approved site investigation and air sparging pilot test work plan submitted 3/2010 with correspondence dated 4/2010.
- *Discussion: Next step – how to move this case toward closure? Where are the nearest sensitive receptors relative to this site? Is low risk closure an option for this site?*

BEACON #419 (T0607700481)

2350 WATERLOO RD E, STOCKTON , CA 95205

Case Age: 19 years
Primary COC: Gasoline
RP Identified: Ultramar
Current land use: Active fueling station

OPEN - REMEDIATION

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1756
CASEWORKER: MICHAEL INFURNA - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390615
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

- Limited regulatory oversight and enforcement in the early years of the case. Groundwater sampling since 1998 and remediation began 7/2005.
- The blower failed in SVE system in 12/2009 and remains shutdown to evaluate non-operating groundwater conditions. Anomalous analytical data in following sampling event; may not be caused by rebound and further assessment is warranted.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700481

Assessment last 5 years

- Ongoing sampling since 1994, currently semi-annual of 11 MWs

Remediation last 5 years

- SVE and in situ air sparge system ongoing since 7/2005

Assessment older than 5 years

- Site assessment 1991
- MW wells installed 1994-1998

Remediation older than 5 years

- USTs removed and over-excavation 10/1993

IMPEDIMENTS TO CLOSURE T0607700481

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *soil vapor intrusion evaluation not completed*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *wells needed to verfiy effectiveness of remediation*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *additional mass needs to be removed*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	elevated levels of petroleum, but declining trend.

Review Conclusions T0607700481

- Limited regulatory oversight and enforcement in the early years of the case. Groundwater sampling since 1998 and remediation began 7/2005. Data in GeoTracker since 2002 and now submittals are regularly reviewed and received in GeoTracker.
- Closure Review indicates vapor intrusion assessment needed and additional source mass needs to be removed.
- Currently, there are two soil vapor extraction wells and three air sparging wells. As of 10/2009, general decreasing trend, but elevated contamination still present in one well. However, as of 4/2010 report, the blower bearings failed in 12/2009 and the SVE system was shutdown and remained shutdown to evaluate non-operating groundwater conditions.
- During this sampling event, concentrations increased, but the consultant believes this is “anomalous data” because the distribution and pattern of the anomalous data are “not consistent with rebound and are thought to be unrelated.” The consultant further recommended to sample in 2Q2010 , the site conceptual model should be updated, and to conduct a risk assessment. Concentrations are up to 19,000 µg/L TPHg in AS-1 (near former tank pit, which is also in the location of the active tank pit.)
- *Discussion: Next step – how to move this case toward closure? Enforce timeline and establish goals? Site conceptual model? Risk assessment? Additional assessment may be warranted to address anomalous data, especially since this is an active gas station and the possibility of a current leak or undiscovered source (like in the pipeline) has not been ruled out yet?*

BEACON #474 (T0607700482)

3440 MAIN ST E, STOCKTON , CA 95205

Case Age: 19 years
Primary COC: Gasoline
RP Identified by Regulator: Ultramar
Current land use: Active Service Station

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1173
CASEWORKER: MICHAEL INFURNA - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390616
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

•Limited regulatory oversight. Quarterly sampling since 1993 and remediation began 3/2005.
•SVE shutdown in 9/2009 because it appeared to operate to maximum potential and rebound evaluation was suggested. Concentrations of TPHg and benzene still elevated near source area.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700482

Assessment last 5 years

- Assessment and ongoing quarterly monitoring since 1993; recently changed to 24 MWs sampled semi-annually

Remediation last 5 years

- Ongoing SVE and air sparging since 3/2005
- SVE shutdown 1/2010 to assess rebound

Assessment older than 5 years

- Site Assessment 3/1991
- MWs installed 12/1993-9/1997
- MWs installed 10/1999-11/2005

Remediation older than 5 years

- UST removal and over-excavation 9/1993
- SVE wells and air sparge wells installed 9/1997-10/1999, remediation began 3/2005

IMPEDIMENTS TO CLOSURE T0607700482

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *soil vapor intrusion evaluation not completed.*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *needed to eval remedial effectiveness*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *SVE & IAS needed to reduce mass even further.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	petroleum levels high, but decreasing with remediation

Review Conclusions T0607700482

- Closure Review dated 7/2009 indicates vapor intrusion assessment is needed and "SVE & IAS needed to reduce mass even further."
- Ongoing remediation began 3/2005; appears there are decreasing trends in concentrations (many below detection limits now) except in wells near the dispenser islands (MW-12 and MW-6). EDF data in GeoTracker since 2005.
- 1Q-2010 results indicate a stable hydrocarbon plume, but elevated levels still detected in two wells near dispenser islands of up to 18,000 µg/L TPHg and 1,400 µg/L benzene in 2/2010. The report indicated that the SVE was shut down to "check for groundwater concentration rebound" on 1/2010.
- Consultant recommended to monitor selected wells in the 2Q-2010 to provide timely data to update site conceptual model and develop a risk assessment. Furthermore, except for isolated instances, hydrocarbon recovery by the SVE has been less than 1 lb/day since 2Q2008 and recommended the SVE remain shutdown to evaluate rebound.
- *Discussion: Next step – how to move this case toward closure? Establish timeline and goals? How long will rebound effect be monitored? Update site conceptual model and request a risk assessment and closure evaluation? Change monitoring frequency for selected wells as recommended to evaluate remedial effectiveness and potential remaining source of leak? Appears to be on track.*

BEACON #641 (T0607700492)

1210 HAMMER LN E, STOCKTON , CA 95209

Case Age: 19 years
RP Identified by Regulator: Ultramar-Beacon
Primary COC: Gasoline
Current Land Use: Active Service Station

OPEN - REMEDIATION

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1125
CASEWORKER: MICHAEL INFURNA - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390632
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

•Limited regulatory oversight in the early years of the case. No activities from time of release in 1991 until 1996. EDF data in GeoTracker since 2002. No remedial activities until 2005.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700492

Assessment last 5 years

- Ongoing sampling since 1996
- Justification for no vapor sampling submitted to regulator 12/31/2009

Remediation last 5 years

- Full remediation (SVE/Air Sparge System) from 3/2005-8/2009

Assessment older than 5 years

- 1991 subsurface investigation
- 22 MWs installed between 7/1996-8/2006 – quarterly GW sampling from 3Q1996 to 4Q2009

Remediation older than 5 years

- USTs removed and over-excavation 6/1996

IMPEDIMENTS TO CLOSURE T0607700492

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *EHD denies request NOT to collect soil samples for vapor intrusion Feb 2, 2010 and requires work plan.*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *13 mw still being monitored pending completion of Soil vapor eval and NFAR submittal*

BENEFITS OF ADDITIONAL WORK

Verify Remedial Action Effectiveness - *Active remediation (SVE/IAS) d/c ok in 8-21-08 letter.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

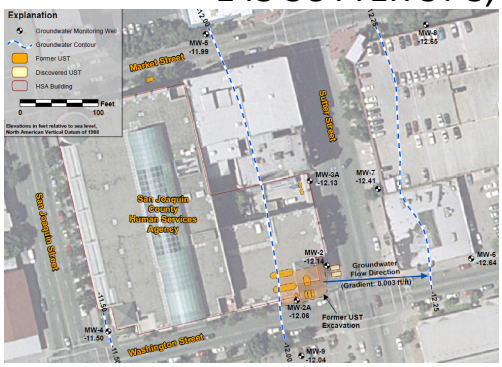
SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	trending down

Review Conclusions T0607700492

- SVE and air sparge remediation conducted since 3/2005 to 8/2009, when the system was shutdown for evaluation of non-remediation groundwater concentration trends. Sampling event in 11/2009 indicated elevated detections of TPHg and benzene in two wells (MW-1 and VW-7) between the existing UST pits of up to 1,700 µg/L TPHg and 14 µg/L benzene. Consultant recommended continued groundwater monitoring to evaluate further rebound evaluation.
- Agency requested vapor intrusion assessment 8/2008 and the consultant submitted a "Technical Justification for No Soil Gas Investigation" 12/31/2009 based on SVE performance/influent and ESLs.
- Agency denied rational for NO soil gas investigation because the residual soil contamination is not defined near MW-1/VW-1&2. Required work plan to install five soil gas probes to 5 fbg for mobile lab analysis in letter dated 2/2010, debated plan forward in emails. Approved work in letter dated 5/2010.
- *Discussion: Next step – how to move this case toward closure? See results of soils gas probe investigation and make determination? Active gas station; will additional soil borings to characterize residual soil contamination be feasible before soil gas samples? Site appears to be nearing closure, possibly within 1 year.*

HUMAN SERVICES AGENCY (T0607700218)

145 SUTTER ST S, STOCKTON, CA 95202



Case Age: 22 years
Primary COC: Benzene, Gasoline
RP Identified: San Joaquin County
Current Use: County of San Joaquin Human Services Administration

Possible Reasons Why This Case Is So Old

- Nine tanks were removed from the site in 1988.
- No activities from 1998 to 2006 (why?).
- In 6/2008, two additional tanks were discovered. A tank removal plan and additional site investigation are pending (for 2 years?). Removal work plan not uploaded to GT.
- As of 4Q-2008, TPHg and benzene still present at up to 12,000 µg/L and 5400 µg/L respectively in MW-2 (in the vicinity of the newly discovered USTs.)
- County regulating County-owned site, Gov't entity site could have funding issues. Potential conflict of interest.

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1257
CASEWORKER: LORI DUNCAN - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390296
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700218

Assessment last 5 years

- Ongoing groundwater monitoring: 5 semi-annual and 3 annual
- Soil and groundwater investigation conducted in 2008
- Geophysical survey conducted in 2008

Remediation last 5 years

- Corrective action plan reviewed 6/2006

Assessment older than 5 years

- Monitoring wells installed in 1988, 1991, 1995, and 1996
- Phase I in 12/1988 and Phase II in 8/1991
- Soils investigation conducted in 1996

Remediation older than 5 years

- Soil excavation and disposal conducted in 1988 at time of nine UST removals
- Corrective action plan submitted 1/1998 for natural attenuation

IMPEDIMENTS TO CLOSURE T0607700218

IMPEDIMENTS TO CLOSURE as reported by regulatory agency

SITE ASSESSMENT INCOMPLETE

Pollutant Sources Have Not Been Adequately Identified or Evaluated - *Two additional tanks were recently discovered, which may be contributing to the groundwater contamination.* Extent of Contamination Has Not Been Determined - *The site is not vertically defined.* Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *A Johnson & Ettinger model has been performed for this site and predicted no risk from vapor intrusion; since that time, however, two additional tanks have been discovered. Once these tanks are removed and the investigation continues, the risk of vapor intrusion should be re-assessed.*

PLUME INSTABILITY

Groundwater Contamination Plume Not Stable or Decreasing - *Concentrations of contaminant in the dirtiest well have remained consistently high over 12 years of monitoring and sampling.*

GROUNDWATER IMPACTS

Groundwater Impacted Above Other Cleanup Goal - *TPHg concentrations have ranged from 10,000-30,000 ppb for the life of the project; benzene 5,000-13,000 ppb.*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *Monitoring wells cannot be abandoned until a determination is made that no further action is required at the site.*

BENEFITS OF ADDITIONAL WORK

Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - *Newly discovered tanks change the SCM and previous knowledge of the extent of the soil contamination.* Protect Designated Beneficial Uses - *The Basin Plan designates all waters of the State to be potentially beneficial.* Restore Beneficial Uses - *Per the Basin Plan, the groundwater at this site must be restored to its natural state.* Protect Human Health - *Future risks to human health must be determined.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	see data and reports submitted to GeoTracker
Indoor Air (Residential or Commercial)	Undetermined	see above

Review Conclusions T0607700218

- Two USTs were discovered in 2008 and removal is pending, which are adjacent to original former UST excavation and appear to be contributing to the groundwater contamination.
- Contaminant concentrations are still orders of magnitude above cleanup goals and groundwater concentrations do not appear to be stable or declining in wells near the former excavation pit and newly discovered UST area.
- Last groundwater sampling event in 4Q-2008 Why?.
- GEO-WELL data not uploaded.
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines? Refer this case to RWQCB for oversight and enforcement to prevent conflict of interest from County Agency not aggressively regulating own County-owned site in same manner as other non-County sites?*

HOLLY SUGAR (T0607700096)

20500 HOLLY DR, TRACY, CA 95376

Case Age: 25 years
Primary COC: Gasoline
RP Identified by Regulator: Holly Sugar Corporation
Current Land Use: Industrial (closed sugar beet factory)

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 2124
CASEWORKER: HARLIN KNOLL - **SUPERVISOR:** NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390132

Regulatory Activities

	ACTION TYPE	ACTION DATE	ACTION
	OTHER REGULATORY ACTIONS	3/8/2010	File review
[VIEW DOCS]	OTHER REGULATORY ACTIONS	7/22/2009	Technical Correspondence
	OTHER REGULATORY ACTIONS	2/13/2009	File review
	CLEANUP ACTION	5/12/1993	Excavate and Treat
	NOTICES	2/24/1993	Notice of Reimbursement
	LEAK ACTION	11/18/1985	Leak Stopped
	LEAK ACTION	11/18/1985	Leak Reported
	LEAK ACTION	10/18/1985	Leak Discovery

Possible Reasons Why This Case Is So Old

- Large, complex site with 4 open cases in GeoTracker. 2 Cleanup Program sites and a Land Disposal Site also at location.
- RP has not adhered to ESI compliance; lab results are uploaded as PDFs. MW locations not mapped.
- Sporadic regulatory oversight.
- An additional tank was discovered underneath a building on site in 2009 and will be evaluated in the near future for closure.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700096

Assessment last 5 years

- Ongoing groundwater monitoring since 6/2008

Remediation last 5 years

- None documented

Assessment older than 5 years

- Soil and water sampling from tank pits in 1985
- Groundwater Monitoring has been sporadic since 1985
- GW and soil gas sampling in 6/1994
- Two MWs installed in 10/1994 and sampled.
- MWs sampled 1999 to 2003

Remediation older than 5 years

- Two USTs (one w/ leaded gasoline) removed in 1985
- Soil over-excavated at Site A (unleaded tank)

IMPEDIMENTS TO CLOSURE T0607700096

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Incomplete Conceptual Site Model (CSM) - *needs to be completed*

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *ESL comparisons need to be completed*

GROUNDWATER IMPACTS

Groundwater Impacted Above Background - *yes, Gasoline impact*

Groundwater Impacted Above Other Cleanup Goal - *yes, TPH-g, BTEX, MTBE above*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *MWs active and will be decommissioned when site closure is granted*

BENEFITS OF ADDITIONAL WORK

Restore Beneficial Uses - *must be restored to it natural state before use*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	concentrations declining

Review Conclusions T0607700096

- Per 2010 groundwater sampling report, groundwater at site is not considered of beneficial use due to high concentration of TDS, brackish nature, and conductivity (Ec) is typically unaffected by hydrocarbon contamination and levels detected at the site are not suitable for either drinking or agricultural.
- If site is redeveloped it most likely will not be residential development due to the adjacent sewage treatment facility. Closure requested in 02/2010 Report, no record of reply by Agency (now 7 months later).
- While monitoring has been sporadic the contamination trend for the site is declining. However, TPHg, BTEX and MTBE are all above cleanup goals. Concentrations are reported in mg/L and data is reported in PDF format; no ESI submittals as data or MW locations.
- An additional UST has been discovered in 2009 and appears to have been added to this case rather than having a new case opened for it in GeoTracker.
- Per closure review, site assessment is incomplete and comparison to ESLs are needed.
- *Discussion: Next step – how to move this case toward closure? Since groundwater has shown to be of no beneficial use, can site be closed? Request site conceptual model?*

STOCKTON TRUCK TERMINAL (T0607700510)

2005 NAVY DR., STOCKTON, CA 95206

Case Age: 23 years
Primary COC: CHLORINATED HYDROCARBONS
RP Identified: Maxuim, Paloma, Anderson; Not Claimed in GeoTracker
Current Land Use: School Bus Parking and Maintenance

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP *(LEAD)* - *CASE #: 2546*
CASEWORKER: HARLIN KNOLL - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - *CASE #: 390659*
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

ACTION TYPE	ACTION DATE	ACTION
OTHER REGULATORY ACTIONS	3/2/2010	File review
OTHER REGULATORY ACTIONS	8/5/2009	Technical Correspondence / Assistance / Other
OTHER REGULATORY ACTIONS	7/27/2009	Technical Correspondence / Assistance / Other
OTHER REGULATORY ACTIONS	6/15/2009	Site Visit / Inspection / Sampling
OTHER REGULATORY ACTIONS	12/19/2008	File review
ENFORCEMENT/ORDERS	7/30/2008	Staff Letter - #07/30/2008
NOTICES	7/23/1996	Notice of Responsibility
LEAK ACTION	5/4/1987	Leak Reported
LEAK ACTION	5/4/1987	Leak Began
LEAK ACTION	5/4/1987	Leak Discovery
LEAK ACTION	5/4/1987	Leak Stopped

Possible Reasons Why This Case Is So Old

- No documents or ESI submittals uploaded.
- Site assessment has not been completed.
- Recalcitrant RP due to funding issue.
- Years of not being regulated by agency, based on review of data in GeoTracker.

NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700510

Assessment last 5 years

- NONE DOCUMENTED, however GeoTracker lists four monitoring wells on site and sampled semi-annually

Remediation last 5 years

- NONE DOCUMENTED

Assessment older than 5 years

- Site history indicates soil borings and 4 MWs have been completed and no current data is available

Remediation older than 5 years

- NONE DOCUMENTED

IMPEDIMENTS TO CLOSURE T0607700510

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *ESL comparisons need to be completed*

Sensitive Receptor Survey Has Not Been Completed - *needs to be completed*

PROCEDURAL IMPEDIMENTS

RP Says They Do Not Have Adequate Funds to Initiate or Continue Work at the Site - *attorney for RP claims money for work is short*

Site Data And Reports Not Uploaded to Geotracker - *RP has not claimed the site in GeoTracker*

Monitoring Wells Not Yet Abandoned - *4 MWs need to be decommissioned when site closed*

BENEFITS OF ADDITIONAL WORK

Restore Beneficial Uses - *ground water quality must be restored by the time of use*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	Chlorinated solvent

Review Conclusions T0607700510

- RP has not complied with agency directives regarding site characterization, claiming the site in GeoTracker, and uploading documents or data to GeoTracker.
- No information on the subsurface conditions is available in GeoTracker.
- The main impediment to closure is incomplete site assessment and recalcitrant RP; *attorney for RP claims money for work is short*.
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines? Aggressively enforce ESI compliance? Recommend to the DA, or transfer case to RWQCB for oversight and enforcement?*

BOYD SERVICE CENTER (T0607700728)

560 TRACY BLVD, TRACY , CA 95376

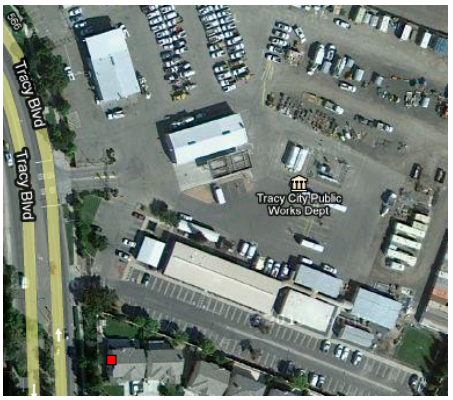
Case Age: 15 years
RP Identified by Regulator: City of Tracy
Primary COC: Gasoline
Current Land Use: Corporation Yard

OPEN - SITE ASSESSMENT

CLEANUP OVERSIGHT AGENCIES
SAN JOAQUIN COUNTY LOP (LEAD) - CASE #: 1421
CASEWORKER: LORI DUNCAN - SUPERVISOR: NONE SPECIFIED
CENTRAL VALLEY RWQCB (REGION 5S) - CASE #: 390904
CASEWORKER: JAMES BARTON - SUPERVISOR: JAMES MUNCH

Possible Reasons Why This Case Is So Old

- Limited regulatory oversight and enforcement.
- Multiple years between activities: no activities from time of release in 1998 until 2003 (five years), then 2003 until 2008 (another five years).
- Separate phase product discovered in three soil borings drilled in 2003. Appears enforcement letters sent, 1/1999, 1/2007, and 10/2007.
- MWs installed in 2/2009 and regulator requested routine groundwater monitoring, but still no response from RP.
- Delayed responses from RP slows progress. Gov't RP, possible funding issue? Conflict?



NOTE: Data queried from GeoTracker and reviewed in July 2010

Activities Conducted to Date Based on GeoTracker Info

T0607700728

Assessment last 5 years

- Additional soil borings and grab GW sampling 10/2008
- Limited Phase II and MWs installed/sampled 2/2009

Remediation last 5 years

- None

Assessment older than 5 years

- Site assessment began with soil and grab GW samples in 2/2003
- Well survey and sensitive receptor survey in 2003

Remediation older than 5 years

- Three USTs removed 12/1998

IMPEDIMENTS TO CLOSURE T0607700728

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Pollutant Sources Have Not Been Adequately Identified or Evaluated - *Site investigation is not complete.*

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *Potential risk from vapor intrusion has not been addressed.*

INADEQUATE SOURCE CONTROL

Feasible Source Control Not Performed - *No site remediation has been conducted.*

Remaining Source Poses Threat to Groundwater - *Remaining soil contamination threatens the shallow groundwater.*

PLUME INSTABILITY

Groundwater Contamination Plume Not Stable or Decreasing - *Monitoring wells were just recently installed; first reported 2,000 ppb TPHd. Contaminant trends are not yet established.*

PROCEDURAL IMPEDIMENTS

Monitoring Wells Not Yet Abandoned - *Groundwater monitoring wells cannot be abandoned until there is a determination that no further action is required at the site.*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *Remediation would reduce/remove contaminant mass in the former UST area.* Protect Designated Beneficial Uses - *The Basin Plan designates all waters of the State to be potentially beneficial.* Restore Beneficial Uses - *Per the Basin Plan the groundwater must be restored to its natural state.* Protect Human Health - *Future risks to human health must be determined.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	see data and reports submitted to geotracker
Indoor Air (Residential or Commercial)	Undetermined	see above

Review Conclusions T0607700728

- Limited site assessment activities and first MWs installed in 2/2009. GEO_XY EDF for wells pending in GeoTracker.
- Gasoline is indicated as primary COC in GT, but from the last sampling event in 7/2009 detected 79 µg/L TPHg (in MW-1). Elevated concentrations detected were up to 3,200 µg/L for TPHd (in MW-1). Also, separate phase product discovered in three soil borings drilled in 2003, described as bunker oil, and thought to be attributed to historic railroad use of the property.
- Non-responsive RP: the agency requested routine groundwater monitoring and multiple enforcement letters sent, 9/2009 and 3/2010.
- Closure review indicates impediments to closure as "*site investigation not complete*" and "*remaining soil contamination threatens the shallow groundwater.*"
- Government entity site (City of Tracy), which may indicate RP funding issues and potential conflicts with County Agency attempting to regulate a City within that County.
- *Discussion: Next step – how to move this case toward closure? Enforce deadlines and establish timeline/goals? Better response by RP may occur if site is transferred to RWQCB, or, if Agency elects to retain oversight, refer to local DA for enforcement. Government RP; funding issue? Recommend site conceptual model? What are sensitive receptors and risk? Next steps and plan of action?*