STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2013-0028-UST

In the Matter of Underground Storage Tank Case Closure Pursuant to Health and Safety Code Section 25296.40 and the Low-Threat Underground Storage Tank Case Closure Policy

---

BY THE EXECUTIVE DIRECTOR:[1]

By this order, the Executive Director directs closure of the underground storage tank (UST) case at the site listed below, pursuant to subdivision (a) of section 25296.40 of the Health and Safety Code.[2] The name of the petitioner, the site name, the site address, the Underground Storage Tank Cleanup Fund (Fund) claim number if applicable, the lead agency, and case number are as follows:

Tower Energy Group
Former Food & Liquor No. 166
180 North Main Street, Willits, Mendocino County
Fund Claim No. 445
North Coast Regional Water Quality Control Board, Case No. 1TMC054

I. STATUTORY AND PROCEDURAL BACKGROUND

Upon receipt of a petition from a UST owner, operator, or other responsible party, section 25296.40 authorizes the State Water Resources Control Board (State Water Board) to close or require closure of a UST case where an unauthorized release has occurred, if the State Water Board determines that corrective action at the site is in compliance with all of the requirements of subdivisions (a) and (b) of section 25296.10. The State Water Board, or in

---

[1] State Water Board Resolution No. 2012-0061 delegates to the Executive Director the authority to close or require the closure of any UST case if the case meets the criteria found in the State Water Board's Low-Threat Underground Storage Tank Case Closure Policy adopted by State Water Board Resolution No. 2012-0016.

[2] Unless otherwise noted, all references are to the California Health and Safety Code.

certain cases the State Water Board Executive Director, may close a case or require the closure of a UST case. Closure of a UST case is appropriate where the corrective action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with: 1) Chapter 6.7 of division 20 of the Health and Safety Code and implementing regulations; 2) Any applicable waste discharge requirements or other orders issued pursuant to division 7 of the Water Code; 3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

State Water Board staff has completed a review of the UST case identified above, and recommends that this case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Summary has been prepared for the case identified above and the bases for determining compliance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closures (Low-Threat Closure Policy or Policy) are explained in the Case Closure Summary.

Low-Threat Closure Policy

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low-Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low-threat to human health, safety, and the environment and are appropriate for closure under Health and Safety Code section 25296.10. The Policy provides that if a regulatory agency determines that a case meets the general and media-specific criteria of the Policy, then the regulatory agency shall notify responsible parties and other specified interested persons that the case is eligible for case closure. Unless the regulatory agency revises its determination based on comments received on the proposed case closure, the Policy provides that the agency shall issue a uniform closure letter as specified in Health and Safety Code section 25296.10. The uniform closure letter may only be issued after the expiration of the 60-day comment period, proper destruction or maintenance of monitoring wells or borings, and removal of waste associated with investigation and remediation of the site.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a uniform closure letter or a letter of commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied.

II. FINDINGS

Based upon the UST Case Closure Summary prepared for the case attached hereto, the State Water Board finds that corrective action taken to address the unauthorized release of petroleum at the UST release site identified as:

Tower Energy Group
Former Food & Liquor No. 166
180 North Main Street, Willits, Mendocino County
Fund Claim No. 445
North Coast Regional Water Quality Control Board, Case No. 1TMC054

ensures protection of human health, safety, and the environment and is consistent with Chapter 6.7 of division 20 of the Health and Safety Code, and implementing regulations, the Low-Threat Closure Policy and other water quality control policies and applicable water quality control plans.

Pursuant to the Low-Threat Closure Policy, notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60-day comment period has been provided to notified parties, and any comments received have been considered by the State Water Board in determining that the case should be closed.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Water Board (Regional Water Board) pursuant to division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to division 7 of the Water Code, or directives issued by a Local Oversight Program (LOP) agency for this case should be rescinded to the extent they are inconsistent with this Order.

III. ORDER

IT IS THEREFORE ORDERED that:

A. The UST case identified in Section II of this Order, meeting the general and media-specific criteria established in the Low-Threat Closure Policy, be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a uniform closure letter, the Petitioner is ordered to:

1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;

2. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and

3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in Section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.

B. The tasks in subparagraphs (1) and (2) of Paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299, subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.

C. Within 30 days of receipt of proper documentation from the Petitioner that requirements in subparagraphs (1) and (2) of Paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.

D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to Paragraph (C), the Deputy Director of the Division of Water Quality shall issue a uniform closure letter consistent with Health and Safety Code section 25296.10, subdivision (g) and upload the uniform closure letter and UST Case Closure Summary to GeoTracker.

E. Pursuant to section 25299.57, subdivision (l) (1), and except in specified circumstances, all claims for reimbursement of corrective action costs must be received by the Fund within 365 days of issuance of the uniform closure letter in order for the costs to be considered.

F. Any Regional Water Board or LOP agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case identified in Section II is rescinded, but only to the extent the Regional Water Board order or LOP agency directive is inconsistent with this Order.

Executive Director

8/20/13
Date

UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: North Coast Regional Water Quality Control Board (Regional Water Board)	Address: 5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403
Agency Caseworker: Kasey Ashley	Case No.: 1TMC054

Case Information

USTCF Claim No.: 445	Global ID: T0604500046
Site Name: Former Food & Liquor No. 166	Site Address: 180 North Main Street, Willits, CA 95490 (Site)
Petitioner: Tower Energy Group Attention: Mark Vasey	Address: 1983 West 190th Street Torrance, CA 90504
USTCF Expenditures to Date: $342,561	Number of Years Case Open: 23

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0604500046

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 Site 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 Site Information.** Highlights of the Conceptual Site Model of the Site follow:

The release at this Site was discovered when the underground storage tanks (USTs) were removed and replaced in 1989. During the USTs removal, approximately 100 cubic yards (cy) of impacted soil were excavated. There is currently an active fueling facility on Site.

Based on the historical groundwater data, groundwater concentration trends for total petroleum hydrocarbons as gasoline (TPHg), benzene, methyl tert-butyl ether (MTBE), and tert-butyl alcohol (TBA) have been either stable or decreasing in all groundwater monitoring wells. Petroleum constituents have been monitored in Mill Creek since 2003. Historical data indicate that MTBE was only detected two times in Mill Creek. These detections were below the water quality objective (WQO). TBA was detected once at 16 µg/L in the creek. Petroleum constituents have not been detected in Mill Creek since 2004.

The petroleum release is limited to the shallow soil and groundwater. The affected groundwater is not currently being used as a source of drinking water or any other designated beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or any other

beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals. Production intervals are in deeper protected aquifers. Remaining petroleum constituents are limited, stable, and declining. Remedial actions have been implemented and further remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the conceptual model. Remaining petroleum constituents do not pose significant risk to human health, safety, or the environment.

Rationale for Closure under the Policy

- General Criteria – Site meets all eight general criteria under the Policy.

- Groundwater – Site meets Policy Groundwater-Specific Class "5". Based on an analysis of site-specific conditions, under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health, safety, and the environment and WQOs will be achieved within a reasonable time frame.

  Site conditions only pose a low threat to groundwater and Mill Creek because:
  - The plume is stable.
  - Natural attenuation appears to be established as evidenced by stable or decreasing groundwater concentration trends for TPHg, benzene, MTBE, and TBA in all groundwater monitoring wells and MTBE and TBA have not been detected in Mill Creek since 2004.
  - USEPA National Recommended Water Quality criteria for the protection of freshwater aquatic life for MTBE are 51,000 µg/L (4-day average) and 151,000 µg/L (one-hour average). USEPA National Recommended Water Quality criteria for the protection of freshwater aquatic life for TBA have not been established. The most current groundwater sampling event in August 2012 indicated that MTBE was detected at 8.7 µg/L in well MW-4, which is significantly lower than the criteria for the protection of freshwater aquatic life. Therefore, even in the worst case that MTBE plume could migrate to Mill Creek, it is highly unlikely that the residual MTBE would impair the beneficial uses of the creek.

- Petroleum Vapor Intrusion to Indoor Air – Site meets the exception for vapor intrusion to indoor air. The Site is an active petroleum fueling facility and has no release characteristics that can be reasonably believed to pose an unacceptable health risk.

- Direct Contact and Outdoor Air Exposure – Site meets the Policy Class "a". Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 of the Policy. The estimated naphthalene concentrations in soil meet the thresholds in Table 1 for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Objections to Closure

Regional Water Board staff objected to UST case closure because:

1. The groundwater plume is not fully defined to the south of well MW-4.

   Response: Dissolved concentrations of benzene and MTBE are at or near the WQOs. The concentration trend for TPHg in the groundwater has been decreasing in well MW-4. Historical data indicate that MTBE was only detected two times in Mill Creek. These detections were below

the WQO. TBA was detected once at 16 µg/L in the creek. Petroleum constituents have never been detected in Mill Creek since 2004. Also, to the south-southwest of well MW-4, petroleum constituents have never been detected in well MW-7. Therefore, the plume is adequately defined to the south of well MW-4.

2. A threatened discharge to Mill Creek remained unabated.

   Response: Petroleum constituents have been monitored in Mill Creek since 2003. Historical data indicate that MTBE was only detected two times in Mill Creek. These detections were below the WQO. TBA was detected once at 16 µg/L in the creek. Petroleum constituents have never been detected in Mill Creek since 2004.

   USEPA National Recommended Water Quality criteria for the protection of freshwater aquatic life for MTBE are 51,000 µg/L (4-day average) and 151,000 µg/L (one-hour average). USEPA National Recommended Water Quality criteria for the protection of freshwater aquatic life for TBA have not been established. The most current groundwater sampling event in August 2012 indicated that MTBE was detected at 8.7 µg/L in well MW-4, which is significantly lower than the criteria for the protection of freshwater aquatic life. Therefore, even in the worst case that MTBE plume could migrate to Mill Creek, it is highly unlikely that the residual MTBE would impair the beneficial uses of the creek.

   Based on the above information, the residual petroleum constituents that remain only pose a low threat to human health, safety, or the environment and are not likely to impair the beneficial uses of Mill Creek.

3. Natural attenuation has not been established between well MW-4 and Mill Creek.

   Response: Historical groundwater data have demonstrated that groundwater concentration trends for TPHg, benzene, MTBE, and TBA have been either stable or decreasing in all wells. Also, since no MTBE or TBA has been detected since 2004, natural attenuation appears to be established.

4. In the absence of a well-defined groundwater plume, decreasing trends may be primarily attributed to mixing, dispersion, and dilution.

   Response: Based on the most current groundwater data in August 2012, the plume is adequately defined as evidenced by the non-detect wells on the north (well MW-2a), west (well MW-1a), east (well MW-6), and south (well MW-7).

   Historical data indicate that MTBE was only detected two times in Mill Creek. These detections were below the WQO. TBA was detected once at 16 µg/L in the creek. Petroleum constituents have never been detected in Mill Creek since 2004.

Recommendation for Closure

The corrective action performed at this Site ensures the protection of human health, safety, the environment and is consistent with chapter 6.7 of the Health and Safety Code and implementing regulations, applicable state policies for water quality control and the applicable water quality control plan, and case closure is recommended.

Prepared By: Trinh Pham
Trinh Pham
Water Resource Control Engineer

4/3/2013
Date

Reviewed By: George Lockwood
George Lockwood, PE#59556
Senior Water Resource Control Engineer

4/3/2013
Date

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The Site 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 site complies with the requirements of the Low-Threat UST Case Closure Policy as described below.[1]

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

[1] Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

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

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?**	☐ Yes ☐ No ☒ NA
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).	
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)?**	☒ Yes ☐ No ☐ NA
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?**	☐ Yes ☐ No ☒ NA
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?**	☐ Yes ☐ No ☒ NA

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

Site Location/History

- The Site is located on the northwest corner of North Main Street (Highway 101) and Bittenbender Lane in Willits. The Site is an operating petroleum fueling facility.
- The Site is bounded by commercial facilities to the north, south, and east along North Main Street and to the west by a steep hill bodering a residential neighborhood. The Site is located approximately 30 feet north of Mill Creek.
- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Primary Source of Release: UST system.
- Discovery Date: April 1989.
- Release Type: Petroleum[2].
- Eight monitoring wells have been installed at the Site.
- Free Product: None reported.

Table A: USTs

Tank	Size in Gallons	Contents	Status	Date
2 USTs	10,000	Gasoline	Removed	April 1989
1 UST	500	Waste Oil	Removed	April 1989

Receptors

- Groundwater Basin: North Coastal.
- Groundwater Beneficial Uses: Municipal and domestic water supply (MUN).
- Designated Land Use: Commercial.
- Public Water System: City of Willits Water Department.
- Distance to Nearest Supply Wells: Greater than 1,000 feet.
- Distance to the Nearest Surface Waters: Mill Creek is ~ 30 feet south of the Site.

Geology/Hydrogeology

- Average Groundwater Depth: ~ 13 feet bgs.
- Geology: Soil types vary significantly across the Site. On the western portion of the Site, the lithology consists of bedded chert. On the eastern portion of the Site, a light gray clayey soil is present.
- Hydrology: Groundwater flows to the southeast.

Corrective Actions

- Three USTs and approximately 100 cy of impacted soil were removed in April 1989.
- A dual phase extraction test was performed in April 2008.

[2] "Petroleum" means crude oil, or any fraction thereof, which is liquid at standard conditions of temperature and pressure, which means at 60 degrees Fahrenheit and 14.7 pounds per square inch absolute. (Health & Saf. Code, § 25299.2.)

Table B: Concentrations of Petroleum Constituents in Soil

Constituent	Maximum 0-5 feet bgs (mg/kg)	Maximum 5-10 feet bgs (mg/kg)
Benzene	<0.005	<0.005
Ethylbenzene	<0.005	<0.005
Naphthalene	Not Analyzed	Not Analyzed
PAH*	Not Analyzed	Not Analyzed

* Poly-aromatic hydrocarbons as benzo(a)pyrene toxicity equivalent

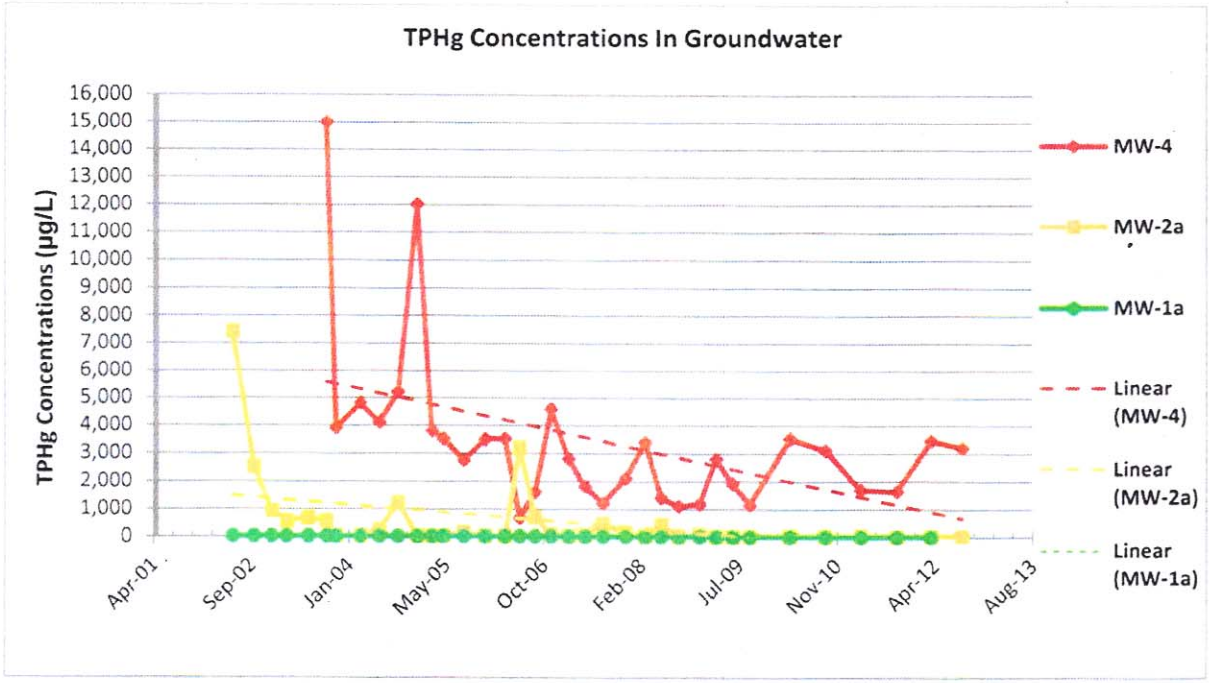
Table C: August 2012 Groundwater Sampling Results

Well No.	TPHg (µg/L)	Benzene (µg/L)	MTBE (µg/L)	TBA (µg/L)
MW-1a	<20	<0.2	<0.2	<2.4
MW-2a	<20	<0.2	0.36	<2.4
MW-3a	<20	<0.2	<0.2	<2.4
MW-4	3,200	1.2	8.7	9.5
MW-5	<20	<0.2	6.8	<2.4
MW-6	<20	<0.2	<0.2	<2.4
MW-7	NA	NA	NA	NA
MW-8	NA	NA	NA	NA
WQO	**5[1]**	**1[2]**	**5[3]**	**12[4]**

1	Taste and odor threshold (McKee and Wolf)
2	California Primary Maximum Contaminant Level (MCL)
3	California Secondary MCL
4	California Department of Public Health Notification Level for Drinking Water
NA	Not available

Groundwater Trends

Reported TPHg in groundwater has demonstrated stable or decreasing trends over time in all wells.

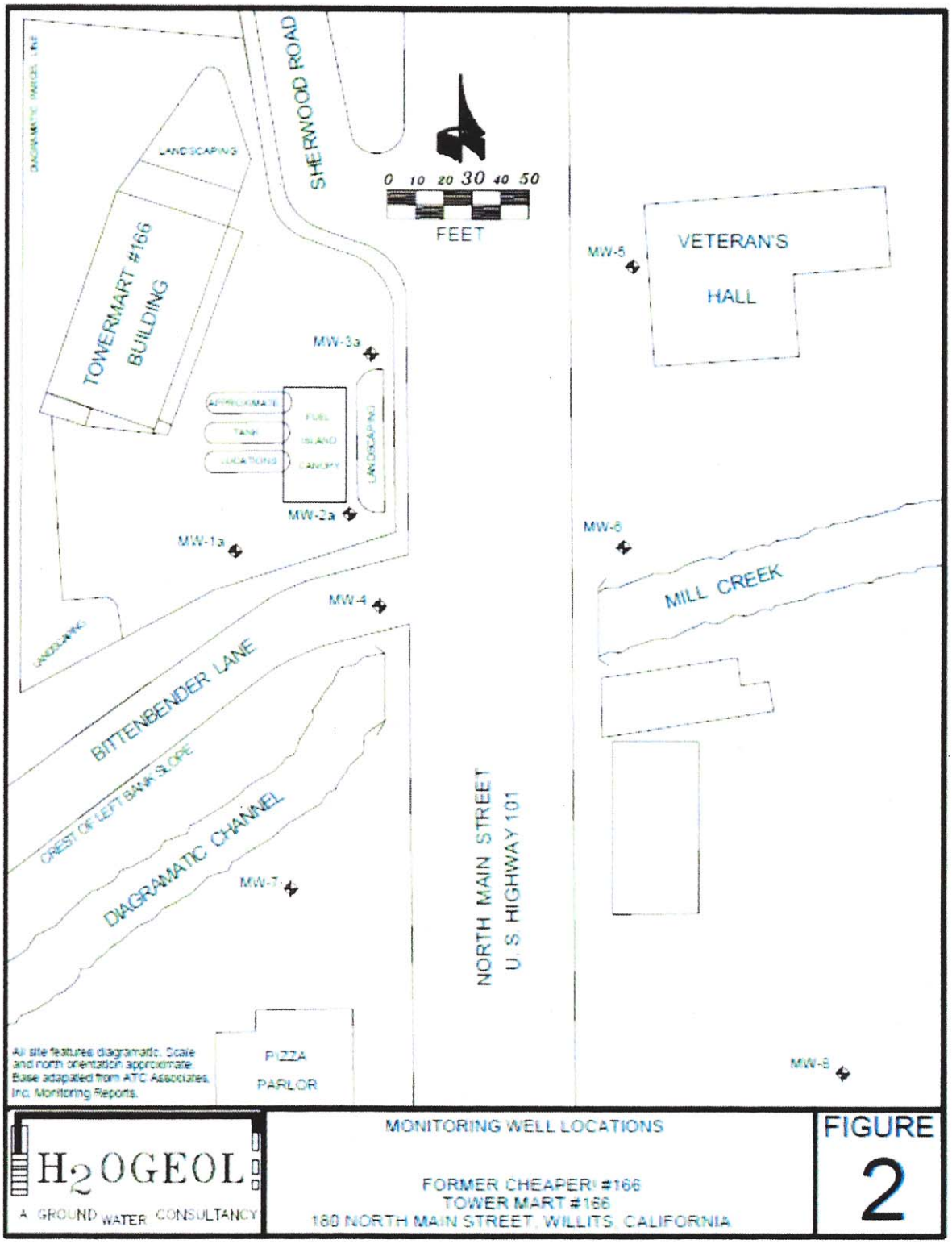


Evaluation of Risk Criteria

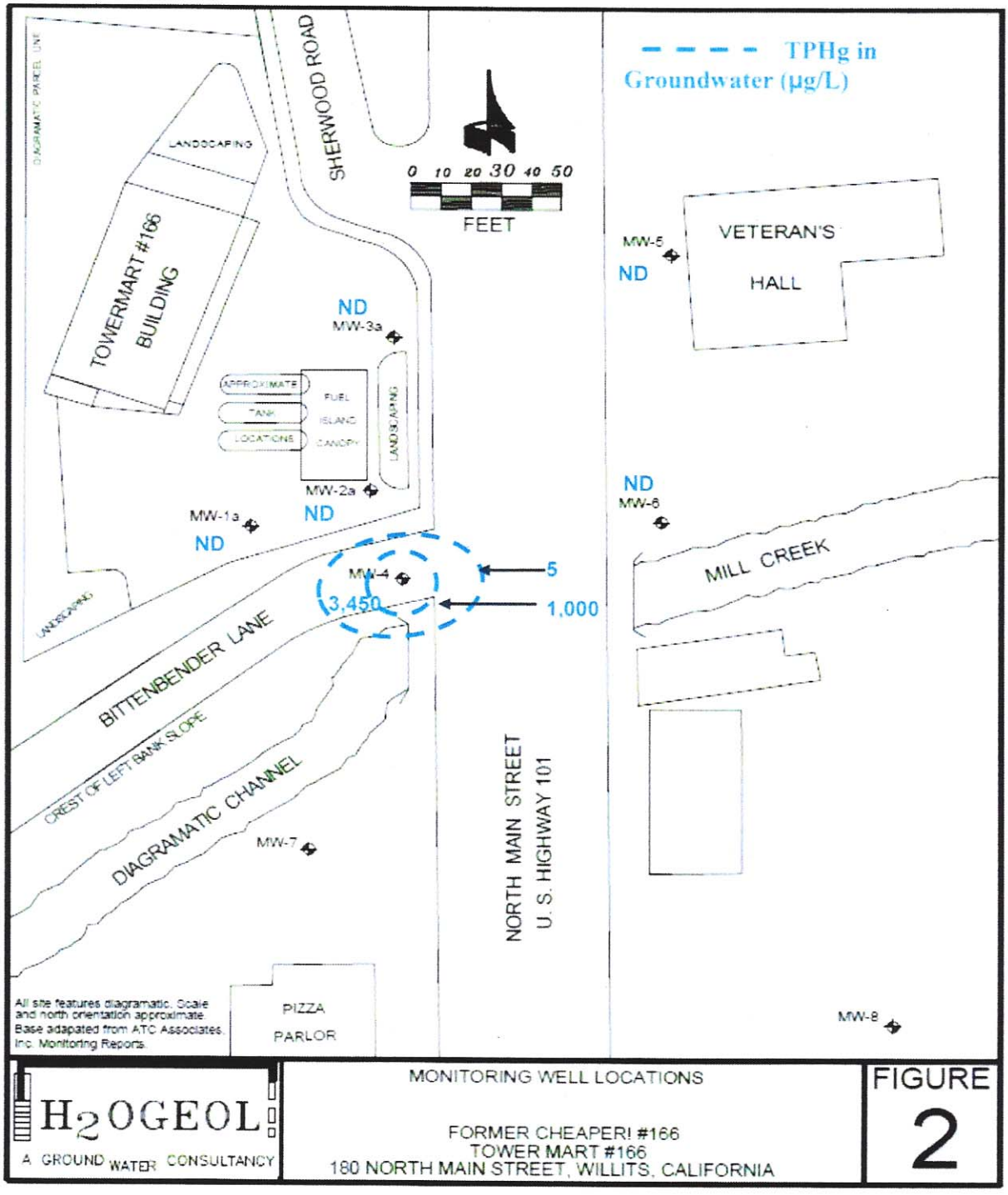
- Maximum Petroleum Constituent Plume Length above WQOs: TPHg groundwater plume is ~ 60 feet, benzene groundwater plume is ~ 60 feet, MTBE groundwater plume is ~ 60 feet.
- Petroleum Constituent Plume Determined Stable or Decreasing: Yes.
- Soil/Groundwater Sampled for MTBE: Yes, see Table C above.
- Residual Petroleum Constituents Pose Significant Risk to the Environment: No.
- Residual Petroleum Constituents Pose Significant Vapor Intrusion Risk to Human Health: No. Site meets exception for active petroleum fueling facility. Petroleum constituents most likely to pose a threat for vapor intrusion were removed during soil excavation. The residual petroleum constituents in soil and groundwater are acceptable because site conditions are protective of human health.
- Residual Petroleum Constituents Pose a Nuisance[3] at the Site: No.
- Residual Petroleum Constituents in Soil Pose Significant Risk of Adversely Affecting Human Health: No.
- Residual Petroleum Constituents Pose Significant Direct Contact and Outdoor Air Exposure to Human Health: No. Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 of the Policy. 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 concentrations can be directly substituted for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Table 1. Therefore, estimated naphthalene concentrations meet the thresholds in Table 1 for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

[3] Nuisance as defined in California Water Code, section 13050, subdivision (m).

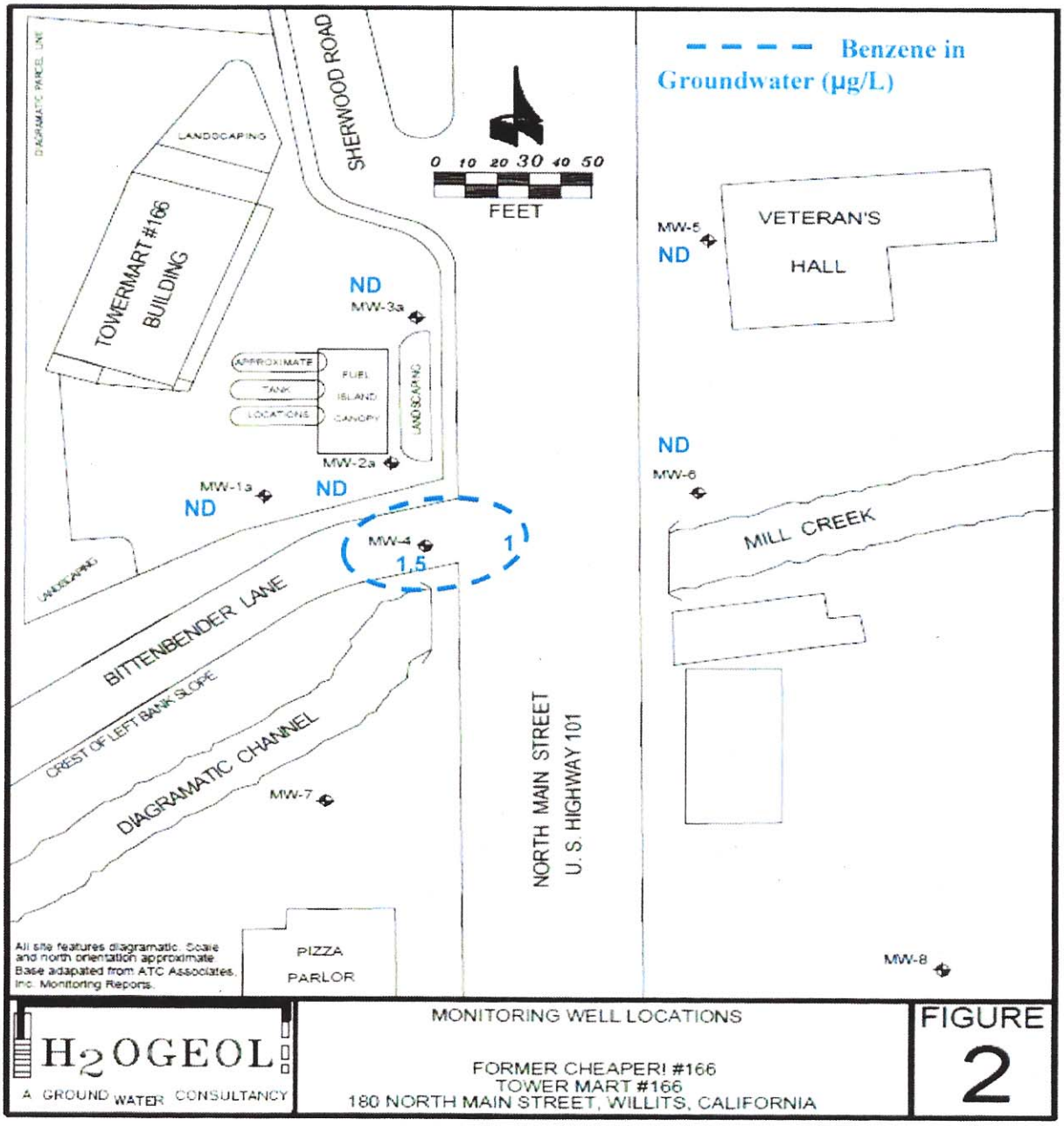
SITE MAP


SHERWOOD ROAD
LANDSCAPING
TOWERMART #166 BUILDING
0 10 20 30 40 50
FEET
VETERAN'S HALL
MW-5
MW-3a
APPROXIMATE TANK LOCATIONS
FUEL ISLAND CANOPY
LANDSCAPING
MW-2a
MW-1a
MW-6
MILL CREEK
MW-4
LANDSCAPING
BITTENBENDER LANE
CREST OF LEFT BANK SLOPE
DIAGRAMATIC CHANNEL
MW-7
NORTH MAIN STREET
U.S. HIGHWAY 101
PIZZA PARLOR
MW-8
All site features diagramatic. Scale and north orientation approximate. Base adapted from ATC Associates, Inc. Monitoring Reports.
H2OGEOL
A GROUND WATER CONSULTANCY
MONITORING WELL LOCATIONS
FORMER CHEAPER! #166
TOWER MART #166
180 NORTH MAIN STREET, WILLITS, CALIFORNIA
FIGURE
2

TPHg IN GROUNDWATER (µg/L) – MARCH 2012



BENZENE IN GROUNDWATER (µg/L) – MARCH 2012



MTBE IN GROUNDWATER- MARCH 2012