

Final

May 11, 2011

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

San Diego Regional Water Quality Control Board

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

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Executive Summary

The Draft version of this report was submitted on May 26, 2010, with a request for a follow-up meeting and input from San Diego Regional Water Quality Control Board (RWQCB) into the “Next Steps for Agency” column of the case cleanup status spreadsheet. The initial report detailed five leaking underground storage tank (LUFT) cases under the oversight of the San Diego RWQCB which were older than 15 years old, and were not enrolled in the Cleanup Fund (CUF). Since the report was issued, San Diego RWQCB has closed 1 case, updated 2 cases with (CUF) data, removing them from the scope of this report, and corrected one case so that it correctly shows up as part of the Cleanup Program. Because only one San Diego RWQCB case remains that is not in the CUF and older than 15 years from the original report, a follow up meeting was not held.

San Diego RWQCB

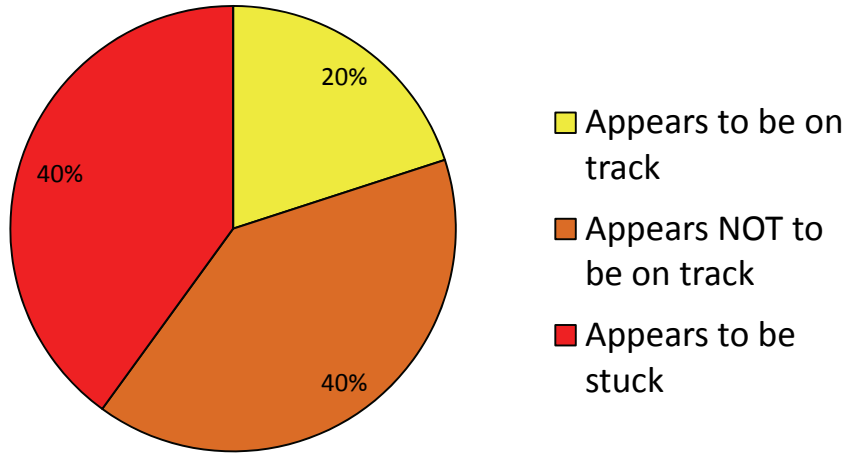
Apparent Case Status: Initial and After

TOTAL NUMBER OF CASES REVIEWED = 5
 NUMBER OF ACTIVE LUST CASES ON NOVEMBER 1, 2010 = 54 CASES
 DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON May 26, 2010
 Follow Up Review May 4, 2011

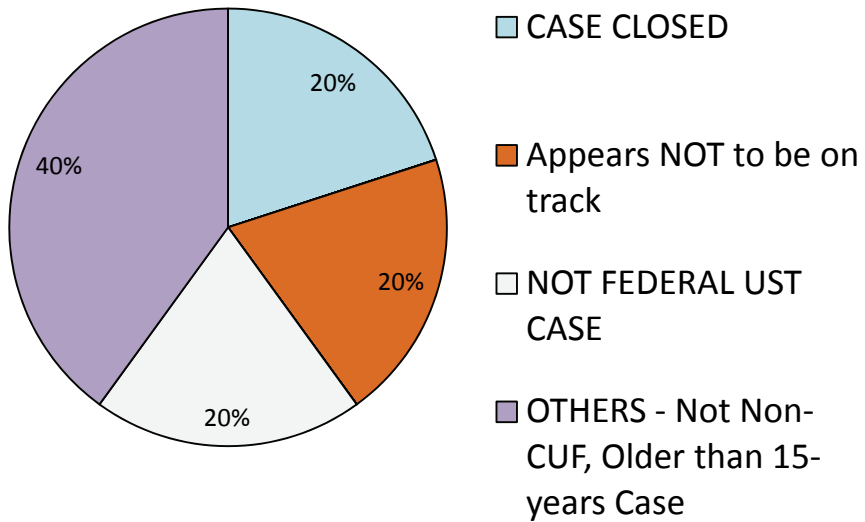
APPARENT STATUS OF CASES REVIEWED – INITIAL REVIEW AND AFTER MEETING TO DISCUSS CASES

Apparent Case Status	Initial Assessment Number of Cases (5-26-2010)	Follow Up Assessment Number of Cases (05-04-2011)
CASE CLOSED	0	1
Appears close to completion	0	0
Appears near completion within 1-year	0	0
Appears to be on track	1	0
Appears NOT to be on track	2	1
Appears to be stuck	2	0
Unable to determine (Insufficient information in GeoTracker)	0	0
NOT FEDERAL UST CASE	0	1
OTHERS - Not Non-CUF, Older than 15-years Case	0	2

Initial Assessment Percentage of Cases (5-26-2010)



Follow Up Assessment Percentage of Cases (05-04-2011)



CASE REVIEW SUMMARY TABLE
(REGION 9 - SAN DIEGO RWQCB)

<i>ESTIMATED STATUS IN THE CLEANUP PIPELINE?</i>	<i>CHANGE IN STATUS IN THE CLEANUP PIPELINE (BASED ON A REVIEW OF CASES 05-04-2011)</i>	<i>SITE NAME (CASE LEAD AGENCY: SAN DIEGO RWQCB - REGION 9)</i>	<i>GLOBAL ID</i>	<i>CASE WORKER</i>	<i>APPARENT TYPE OF RP</i>	<i>RELEASE DATE</i>	<i>NEXT STEPS FOR AGENCY</i>
Appears to be on track	OTHER - Case is now entered as a Cleanup Program Site	TEXACO USA (TERMINAL)	T0607302833	SM	Z - Major Oil Company	7/1/1986	No next steps Under the LUST program.
Appears NOT to be on track	OTHER - Case is now entered in Cleanup Fund	WESTERN FLIGHT INC.	T0607300994	MT	I - Industry (Railroad, Steel etc)	2/26/1992	Not Applicable
Appears NOT to be on track	Appears NOT to be on track	PARSLEY-KENNEDY INC	T0607301327	SJP	O - Other (Individual, Homes etc)	11/10/1993	Push for additional/alternate remediation (current remediation ineffective)
Appears to be stuck	OTHER - Case is now entered in Cleanup Fund	CUNOCAR ACCOUNTING SERVICE	T0607300836	KK	O - Other (Individual, Homes etc)	10/1/1991	Not Applicable
Appears to be stuck	CASE CLOSED as of 3/24/2011	SAN DIEGO EQUIPMENT RENTALS	T0607301751	SM	O - Other (Individual, Homes etc)	1/24/1995	Not Applicable

Attachment 1:

Case Review Power Point Slides from Draft Report

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

1. T0607302833 (TEXACO USA (TERMINAL))
2. T0607300994 (WESTERN FLIGHT INC.)
3. T0607301327 (PARSLEY-KENNEDY INC)
4. T0607300836 (CUNOCAR ACCOUNTING SERVICE)
5. T0607301751 (SAN DIEGO EQUIPMENT RENTALS)

TEXACO USA (TERMINAL) (T0607302833)

9966 SAN DIEGO MISSION RD, SAN DIEGO, CA 92108-1721



Case Age: 24 Years

Primary CoC: GASOLINE

RP Identified by Regulator: Texaco Refining & Marketing, and Southern Pacific Pipeline Prtn.

Current Land Use: Bulk Fuel Terminal

CLEANUP OVERSIGHT AGENCIES

SAN DIEGO RWQCB (REGION 9) (LEAD) - CASE #: 9UT542

CASEWORKER: SEAN MCCLAIN - SUPERVISOR: CRAIG L. CARLISLE

SAN DIEGO COUNTY LOP - CASE #: H04507-001

CASEWORKER: JON SENAHA - SUPERVISOR: MICHAEL VERNETTI



TEXACO USA (TERMINAL) (T0607302833)
9966 SAN DIEGO MISSION RD
SAN DIEGO, CA 921081721

LUST Cleanup Site

Cleanup Status: Open - Remediation
RB Case #: 9UT542
Loc Case #: H04507-001



Possible Reasons Why This Case Is So Old

- Case is managed in conjunction with Mission Valley Terminal Site. Closure will not be granted until both sites are ready.
- Case transferred to RB only in 2007. Only document uploaded to Geotracker is the Case Transfer Letter and no ESI submittals or documents.

NOTE: Data queried from GeoTracker and reviewed in May 2010

Activities Conducted to Date Based on Geotracker Info

T0607302833

Assessment last 5 years

- NONE DOCUMENTED

Remediation last 5 years

- NONE DOCUMENTED

Assessment older than 5 years

- NONE DOCUMENTED

Remediation older than 5 years

- NONE DOCUMENTED

IMPEDIMENTS TO CLOSURE T0607302833

as reported by regulatory agency

PROCEDURAL IMPEDIMENTS

Regional Water Board Objects to Closure - *Regional Board objects to closure until the groundwater pollution has been cleaned up from the MVT and Texaco sites.*

Other - *The MISSION VALLEY TERMINAL (SL607392800) is the responsible party for the Texaco case.*

BENEFITS OF ADDITIONAL WORK

Remove / Reduce Source Mass - *Source mass is currently being remediated.*

Restore Beneficial Uses - *City of San Diego has proposed to use groundwater from this aquifer when the cleanup is complete. BNU must be restored.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	Diesel/gasoline has impacted groundwater.

Review Conclusions T0607302833

- This site overlays a very large LNAPL plume from the adjacent Cleanup Program Site (Mission Valley Terminal), which is in the assessment and remedial action phase in GT. That site involves hundreds of monitoring wells and wells extending to one and a half miles down gradient. The Regional Board has denied closure until such time as the Mission Valley site has been closed.
- No documents or site history regarding this site are present in GeoTracker, and no details are presented in the documents for Mission Valley Terminal regarding this site specifically.
- Activities report indicates, "Responsible Party Information Kinder Morgan Energy Partners is responsible for the cleanup of this site. All documents can be viewed on the Mission Valley Terminal Site."
- *Discussion: Next step – insert site history in GT for public to easily understand site status?*

WESTERN FLIGHT INC. (T0607300994)

2210 PALOMAR AIRPORT RD., CARLSBAD, CA 92008-4816



Case Age: 18 years
Primary COC: AVIATION
RP Identified: Western Flight International
Current Land Use: Air port fueling pad

Possible Reasons Why This Case Is So Old

- No activities or enforcement documented between 1989 to 2005.
- No remedial activities.
- At least 2 releases, the first was in 1987, the second in 1992.
- Slow progress.

CLEANUP OVERSIGHT AGENCIES

SAN DIEGO RWQCB (REGION 9) (LEAD) - CASE #: 9UT2227
 CASEWORKER: [SEAN MCCLAIN](#) - SUPERVISOR: CRAIG L. CARLISLE
 SAN DIEGO COUNTY LOP - CASE #: H13987-003
 CASEWORKER: [JAMES CLAY](#) - SUPERVISOR: MICHAEL VERNETTI

NOTE: Data queried from GeoTracker and reviewed in May 2010

Activities Conducted to Date Based on Geotracker Info T0607300994

Assessment last 5 years

- MWs sampled in 8/2005
- Subsurface investigation conducted in 2006
- Groundwater monitoring wells were installed and a soil boring advanced in 2007
- Last GWMR submitted 7/2009

Remediation last 5 years

- NONE DOCUMENTED

Assessment older than 5 years

- Investigations conducted in 1987, 1988, and 1989
- WP assessment prepared in 1997 not implemented

Remediation older than 5 years

- NONE DOCUMENTED

IMPEDIMENTS TO CLOSURE T0607300994

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Extent of Contamination Has Not Been Determined - *Delineation is not complete.*
 Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *Delineation is not complete or adequately assessed*

PROCEDURAL IMPEDIMENTS

Regional Water Board Objects to Closure - *Regional Board objects to closure. Free product must be removed from groundwater.*

BENEFITS OF ADDITIONAL WORK Fill-in RI Data Gaps - *Delineate plume, remove free product from groundwater.*

Remove / Reduce Source Mass - *Remove free product.*

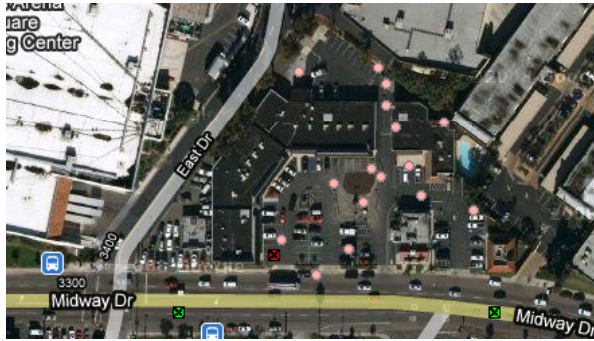
SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	Free product remains near former UST.

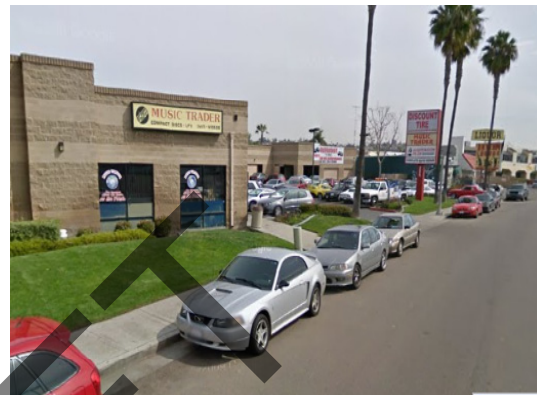
Review Conclusions T0607300994

- Per 1/2009 report, elevated soil and GW samples detected, but “no separate phase hydrocarbons has been observed in any of the wells during the current and previous groundwater sampling events;” however, the closure review indicates, “free product remains near former UST.”
- Site overlays Land Disposal Case **PALOMAR AIRPORT LANDFILL (L10003501496)**. This is an actively managed former landfill site. 1/2009 report also indicated that additional monitoring wells and soil borings west of the site may put the integrity of the landfill cover system at risk and create a preferential pathway for the migration of water within the landfill. Site is located in a groundwater basin that has been determined to have no potential or existing beneficial uses.
- Per GT activities report, regulator conducted site visit on 3/12/2009 and met with consultant to discuss CAP. Also, internal meeting to discuss “County LEA referral letter to RWQCB” dated 2/15/2010.
- Discussion: Next step – how to move this case towards cleanup closure?

PARSLEY-KENNEDY, INC. (T0607301327)
 3148 MIDWAY DRIVE, SAN DIEGO , CA 92110



Case Age: 17 years
 RP Identified by Regulator: Michael
 Liberatore of Pacifica Companies
 Primary COC: Gasoline
 Current Land Use: Shopping mall



Possible Reasons Why This Case Is So Old

- Free product remains in 4 of the 15 GW monitoring wells, and dissolved benzene up to 12,000 ppb in MW-4 in May 2009.
- Other than free product removal from 4 wells (62 gallons total), no active remediation has occurred.

CLEANUP OVERSIGHT AGENCIES
 SAN DIEGO RWQCB (REGION 9) (LEAD) - CASE #: 9UT2579
 CASEWORKER: SUE J. PEASE - SUPERVISOR: BOB MORRIS
 SAN DIEGO COUNTY LOP - CASE #: H21161-002

NOTE: Data queried from GeoTracker and reviewed in May 2010

**Activities Conducted to Date Based on Geotracker Info
 T0607301327**

Assessment last 5 years

- Quarterly GWM, now semi-annual.
- Vapor survey 7/2009
- Three MWs were installed in approx. 2008.
- Risk assessment and SRS submitted 10/2009

Remediation last 5 years

- USTs removed in 2007 (installed after initial removal but never put into service)
- LPH removal during GWM events

Assessment older than 5 years

- 1991-2003 site assessment; MWs installed and ongoing monitoring

Remediation older than 5 years

- Soil excavation after UST removals in 1984.
- Free product removal from 4 wells during 1996-2003
- Vacuum truck used to remove LPH in 6/2003

IMPEDIMENTS TO CLOSURE T0607301327

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Incomplete Conceptual Site Model (CSM) - *Needs additional site assessment, health risk assessment.*
 Extent of Contamination Has Not Been Determined - *Groundwater plume not delineated.*

INADEQUATE SOURCE CONTROL

Feasible Source Control Not Performed - *Only remove free product; no other remediation performed.*

GROUNDWATER IMPACTS

Groundwater Impacted Above Other Cleanup Goal - *Site in non-beneficial use area for groundwater, but free product still exists after 16 years.*

PROCEDURAL IMPEDIMENTS

Regional Water Board Objects to Closure - *Free product in 4 monitoring wells. Need to implement workplan for Health Risk Assessment. Need evaluate gw gradient and delineate plume.*

BENEFITS OF ADDITIONAL WORK

Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - *Need confirm groundwater gradient, define GW plume.*

Remove / Reduce Source Mass - *Remove free product, other remediation.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Already Impacted	Free product.

Review Conclusions T0607301327

- Site assessment occurred from 1991 to 2008 with the installation of a total of 17 GW monitoring wells, and quarterly GW monitoring.
- Free product removal from 4 of the MWs has yielded only 62 gallons total for all collection years.
- GW beneath the site (shopping mall) is NOT considered beneficial for any uses -“exempt from beneficial uses” (GW is 7-11 feet bgs).
- Risk assessment and SVS submitted 10/2009 – concluded there is a potentially a health threat posed by the migration of benzene vapors from the site subsurface into the shopping center buildings. CAP and additional site assessment recommended.
- Only GW monitoring and free product recovery has occurred in the 16 years since the USTs were removed.
- *Discussion: Next step – how to move this case towards cleanup closure?*

CUNOCAR ACCOUNTING SERVICE (T0607300836)

425 25TH ST., SAN DIEGO, CA 92102



Case Age: 19 years
Primary COC: GASOLINE
RP Identified by Regulator: DONALD AND MARLENE SWALL (Tank Owners)
Current Land Use: Commercial

Possible Reasons Why This Case Is So Old

- Recalcitrant RP: No enforcement activities between 1993 and 2006. Case transferred to RB in 2006 and several enforcement actions issued in GT.
- 2008 assessment resulted in a request for an additional assessment. Multiple enforcement letters sent, but appears work has not resumed.
- No ESI submittals in GT.

CLEANUP OVERSIGHT AGENCIES
 SAN DIEGO RWQCB (REGION 9) (LEAD) - CASE #: 9UT2068
 CASEWORKER: [BARRY S. FULVER](#) - SUPERVISOR: JOHN P. ANDERSON
 SAN DIEGO COUNTY LOP - CASE #: H05597-001
 CASEWORKER: [KEITH KEZER](#) - SUPERVISOR: MICHAEL VERNETTI



NOTE: Data queried from GeoTracker and reviewed in May 2010

Activities Conducted to Date Based on Geotracker Info T0607300836

Assessment last 5 years

- Subsurface assessment conducted in 2008

Remediation last 5 years

- NONE DOCUMENTED

Assessment older than 5 years

- Soil samples collected at time of removal in 1991
- Soil samples collected after over-excavation in 1993

Remediation older than 5 years

- UST removed in 1991
- Soil excavation in 11/1993

IMPEDIMENTS TO CLOSURE T0607300836

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Extent of Contamination Has Not Been Determined - *Site assessment has not been completed.*

Other Impediments

Recalcitrant RP.

BENEFITS OF ADDITIONAL WORK

Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - *Assessment needs to be completed prior to completing CSM and determining risks to human health and the environment.*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

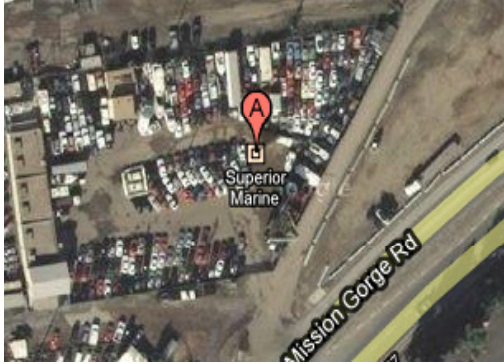
SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Storm drain (Runoff of contaminated soil)	Undetermined	Need to complete assessment to determine potential impact.
Indoor Air (Residential or Commercial)	Undetermined	Need to complete assessment to determine potential impact.

Review Conclusions T0607300836

- RP performed no work at the site from 1993 to 2008.
- An assessment was conducted in 2008 that resulted in the recommendation for further site characterization. Shallow soil impacted, deep soil not impacted, and groundwater not encountered. Multiple enforcement actions in GT, but appears work has not resumed.
- Closure summary page lists indoor air as a potential sensitive receptor, but after 18 years the volatile components of gasoline have most likely attenuated or degraded.
- *Discussion: Next step – how to move this case towards cleanup closure? Enhanced enforcement? EAR or refer to the District Attorney? No ESI submittals, enforce ESI compliance? Evaluate if vapor is feasible issue?*

SAN DIEGO EQUIPMENT RENTALS (T0607301751)

6990 MISSION GORGE ROAD, SAN DIEGO , CA 92120



Case Age: 15 years
RP Identified by Regulator: DOUGLAS R. PRICE
Primary COC: DIESEL
Current Land Use: Light industry (i.e., Superior Marine)

CLEANUP OVERSIGHT AGENCIES
SAN DIEGO RWQCB (REGION 9) (LEAD) - CASE #: 9UT2984
CASEWORKER: SEAN MCCLAIN - SUPERVISOR: CRAIG L. CARLISLE
SAN DIEGO COUNTY LOP - CASE #: H04907-001

Possible Reasons Why This Case Is So Old

- No site assessment has occurred since TPH-diesel was detected at 14,000 PPM during the UST removals in 1995. No ESI submittals, site history is limited.
- The case was transferred from the LOP to the RWQCB in January 2007.
- The RP's September 2007 application to the State Fund is still pending.



NOTE: Data queried from GeoTracker and reviewed in May 2010

Activities Conducted to Date Based on Geotracker Info T0607301751

<p><u>Assessment last 5 years</u></p> <ul style="list-style-type: none"> • None 	<p><u>Remediation last 5 years</u></p> <ul style="list-style-type: none"> • None
<p><u>Assessment older than 5 years</u></p> <ul style="list-style-type: none"> • Soil sampling during the UST removals in 1995 showed a maximum of 14,000 PPM TPH as diesel. 	<p><u>Remediation older than 5 years</u></p> <ul style="list-style-type: none"> • None

IMPEDIMENTS TO CLOSURE T0607301751

as reported by regulatory agency

IMPEDIMENTS TO CLOSURE

SITE ASSESSMENT INCOMPLETE

Incomplete Conceptual Site Model (CSM) - *No CSM submitted. No assessment has been conducted. Pollutant Sources Have Not Been Adequately Identified or Evaluated - TPH up to 14,000 mg/kg was identified in soil during tank removal in 1995. No assessment has been conducted.*

Extent of Contamination Has Not Been Determined - *TPH up to 14,000 mg/kg was identified in soil during tank removal in 1995. No assessment has been conducted.*

Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *TPH up to 14,000 mg/kg was identified in soil during tank removal in 1995. No assessment has been conducted.*

Sensitive Receptor Survey Has Not Been Completed - *TPH up to 14,000 mg/kg was identified in soil during tank removal in 1995. No assessment has been conducted.*

PROCEDURAL IMPEDIMENTS

RP Says They Do Not Have Adequate Funds to Initiate or Continue Work at the Site - *RP submitted a request to the Cleanup Fund in September 2007 and has not yet been approved by the Fund.*

BENEFITS OF ADDITIONAL WORK

Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants - *No CSM has been submitted. Need to document how contaminants are expected to migrate in space and time.*

Protect Designated Beneficial Uses - *Aquifer used for drinking water supply*

SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTOR	TIME FRAME FOR IMPACT	COMMENTS
Groundwater	Undetermined	TPH at concentrations up to 14,000 mg/kg may be able to leach to Groundwater

Review Conclusions T0607301751

- During the removals of 5 USTs in 1995, TPH-diesel was detected at up to 14,000 PPM in 4 of 10 soil samples. Enforcement letters sent 1995, No follow-up sampling or site assessment has occurred.
- The RP's September 2007 application to the State Fund is still pending.
- According to the GeoTracker entries, the underlying GW is a potential drinking water source. Follow-up sampling needs to occur to determine the extent of any remaining hydrocarbon contamination.
- Site walk conducted on 2/2010 and consultant is bidding for site assessment (regulator recommended soil/GW sampling near former USTs.) Incremental progress being made.
- Discussion: Next step – how to move this case towards cleanup closure?