



**San Francisco Bay Regional Water Quality Control Board**

**TO:** Tom Howard  
Executive Director  
State Water Resources Control Board



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**FROM:** Bruce H. Wolfe  
Executive Officer  
San Francisco Bay Regional Water Quality Control Board

**DATE:** March 16, 2012

**SUBJECT:** Comments on Low-Threat UST Closure Policy

San Francisco Bay Regional Water Board staff appreciate the opportunity to comment on the January 31, 2012 draft of the Low-Threat Underground Storage Tank Case Closure Policy (draft policy). As explained below, we support adoption of the draft policy and have only one comment.

We agree with the basic premise of the draft policy that natural biodegradation is a powerful tool for cleaning up residual petroleum contamination from underground storage tank (UST) releases once the "source" of the release has been removed and support the specific provisions of the draft policy. We have closed low-threat UST cases in the San Francisco Bay Region for many years. However, we understand that oversight agencies across the State view this topic differently. Having a statewide policy on low-threat case closure will foster consistency and hasten timely cleanup and closure of UST cases while ensuring water quality protection.

As noted, we have one comment on the draft policy, which regards its applicability to non-UST petroleum releases, such as pipeline spills and releases from bulk-fuel storage facilities. While most elements of the draft policy can be applied to non-UST petroleum releases, the direct-contact screening levels proposed in Table 1 will often be inappropriate for these non-UST sites. This is because the proposed Table 1 screening levels are based on relatively small releases typical at corner gas stations. Specifically, they incorporate assumptions about a finite source and a small soil-pollution "footprint". Those assumptions would not apply to significantly larger petroleum releases, and the proposed Table 1 screening levels would not be protective at such sites. We are concerned that parties responsible for these larger petroleum release sites will attempt to apply the Table 1 screening levels, lacking any direction otherwise in the draft policy.

We suggest a simple fix: adding a footnote to Table 1 that explains the "small release" assumption that went into the screening levels. Below is suggested language (in italics):

(Table 1) Notes:

1. *This table was derived using assumptions about the release scenario and the resulting source size of petroleum hydrocarbon releases that are commonly found at typical UST sites (i.e., petroleum releases result in a relatively small finite source that degrades to non-detect within a reasonable time frame). This table is appropriate to use only for sites that exhibit those characteristics.*

2. Based on the seven carcinogenic poly-aromatic hydrocarbons (PAHs) as benzo(a)pyrene toxicity equivalent [BaPe]. Sampling and analysis for PAH is only necessary where soil was affected by either waste oil or Bunker C fuel.

Please contact me at (510) 622-2314 or [bwolfe@waterboards.ca.gov](mailto:bwolfe@waterboards.ca.gov) if you have any questions.

cc: Chuck Headlee, R2 UST program manager