

Appendix H

Closeout Letter and Closeout Summary

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San Francisco Bay Regional Water Quality Control Board

January 17, 2019
File No. 01-0603 (REL)

Texaco Downstream Properties Inc.
c/o: Chevron Environmental Management Company
Attn.: Ms. Carryl MacLeod
6101 Bollinger Canyon Rd.
San Ramon, CA 94583
Sent via email: CMacLeod@chevron.com

**SUBJECT: Transmittal of Closure Letter and Case Closure Summary for
Texaco Station No. 21-1345, 1998 Whipple Road, Union City,
Alameda County**

Dear Ms. MacLeod:

Attached please find the uniform underground storage tank closure letter and the case closure summary for the subject site. The current record fee title owners were notified of the proposed closure in accordance with Section 25296.20 of Chapter 6.7 of the health and Safety Code. We sent a [public notification](#) of the proposed case closure to all interested parties, which included a 60-day public comment period. No comments were received.

Based on the site specific information and data available in GeoTracker and the Regional Water Board's case file, we conclude that this case meets all the criteria of the State Water Board's [Low-Threat Underground Storage Tank Case Closure Policy](#) and that a No Further Action determination is appropriate.

There may be residual petroleum-contaminated soil and groundwater at this site that could pose an unacceptable risk as a result of future construction/redevelopment activities, such as onsite excavation activities, the installation of water wells at or near the site, or change to a more sensitive land use. Contractors performing subsurface activities at the site should be prepared to encounter soil and groundwater contaminated with petroleum hydrocarbons, and any encountered pollution should be managed properly to avoid threats to human health or the environment. Proper management may include sampling, risk assessment, additional cleanup work, mitigation measures, or some combination of these tasks.

If you have any questions, please contact Mr. Ralph Lambert of my staff at (510) 622-2382 or e-mail: Ralph.Lambert@waterboards.ca.gov.

Sincerely,



Digitally signed by Stephen Hill
Date: 2019.01.17 08:29:23
-08'00'

Thomas Mumley
Interim Executive Officer

Attachments: Case Closure Letter
Case Closure Summary
Site Maps

Copy sent via email with attachments:
State Water Resources Control Board
Underground Storage Tank Cleanup Fund
Attn.: Mr. Pat Cullen
Email: Pat.Cullen@waterboards.ca.gov

Alameda County Water District
Attn: Ms. Michell Myers and Doug Young
Email: Michelle.Myers@acwd.com
Douglas.Young@acwd.com

Property Owner
Attn.: Mr. Stephen Ng
Email: SiewtNg@gmail.com

TRC
Attn.: Mr. Gil Fry
Email: GFry@trcsolutions.com

Chevron
Attn.: Shelby Lathrop
Email: SLathrop@chevron.com

GHD
Attn.: Mr. Brian Silva
Email: Brian.Silva@ghd.com

Case Closure Summary (Page 1 of 5)

Leaking Underground Fuel Tank Program

I. Agency Information

Date: **December 6, 2018**

Agency Name: Alameda County Water District	Address: 43885 South Grimmer Boulevard
City, State, ZIP: Fremont, CA 94538	Phone: (510) 668-4452
Staff Person: Douglas Young	Title: Groundwater Resources Hydrogeologist

II. Site Information

Site Facility Name: Texaco Station No. 21-1345			
Site Facility Address: 1998 Whipple Road, Union City, CA, 94587 (Figure 1)			
Local Case Number: 0113	Regional Board Case No.: 01-0603	GeoTracker ID: T0600100556	
Unauthorized Release Form Filing Date: Not Available		Cleanup Fund Number: 6185	
Responsible Party	Address	Phone Number	E-Mail Address
Chevron Environmental Management Company Contact: Carryl MacLeod	6101 Bollinger Canyon Road San Ramon, CA, 94583	(925) 790-6506	CMacLeod@chevron.com
Property Owner	Address	Phone Number	E-Mail Address
Steven Ng	P.O. Box 281080 San Francisco, CA, 94128	(650) 430-1833	siewtng@gmail.com

Tank Number	Size (gallons)	Contents	Type of Underground Storage Tank	Closed In Place/Removed/Existing	Date
1	8,000	Gasoline	Single-walled, steel	Removed	November 1992
2	8,000	Gasoline	Single-walled, steel	Removed	November 1992
3	8,000	Diesel	Single-walled, steel	Removed	November 1992
4	550	Waste oil	Single-walled, fiberglass	Removed	September 1986
5	550	Waste oil	Double-walled fiberglass	Removed	November 1992

III. Release and Site Characterization Information

Cause and Type of Release: Leaking Underground Fuel Tank System		
Site Characterization Complete? Yes	Investigative Methods Appropriate? Yes	
Monitoring Wells Installed? Yes	Total No.: 13	Proper Screened Interval? Yes
Highest Groundwater Depth Below Ground Surface (bgs): 1.55 feet	Lowest Groundwater Depth Below Ground Surface: 12.15 feet	Flow Direction: North-Northeast
Most Sensitive Current Groundwater Use: Potential drinking water source		
Most Sensitive Potential Groundwater Use: Drinking water source		
Probability of Use: Undetermined		
Summary of Water Wells in Vicinity: No known water supply wells are located within 1,000 feet of the site. The nearest water supply well is located approximately 1,514 feet North of the site.		

Case Closure Summary (Page 2 of 5)
Leaking Underground Fuel Tank Program

III. Release and Site Characterization Information (Continued)

Are Drinking Water Wells Affected? <i>No</i>	Aquifer Name: <i>Shallow Water-Bearing Zone</i>
Is Surface Water Affected? <i>No</i>	Nearest Surface Water Name: <i>An open unlined flood control channel which ties into Zone 3A, Line M, is located approximately 1,491 feet Southwest of the site.</i>
Report(s) on file? <i>Yes</i>	Where is report filed? <i>Alameda County Water District (ACWD) and State Water Resources Control Board's (State Board) Geotracker database: http://geotracker.waterboards.ca.gov Case ID: T0600100556</i>

Treatment and Disposal of Affected Material			
Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Free Product	<i>None</i>	<i>Not Applicable (N/A)</i>	<i>N/A</i>
Soil	<i>200 cubic yards</i>	<i>Soil excavated during UST removal and subsequent over-excavation was transported to BFI Landfill in Livermore for disposal.</i>	<i>November 1992</i>
Soil	<i>1,360 cubic yards</i>	<i>Soil excavated during UST removal and subsequent over-excavation was transported to Forward Landfill in Manteca for disposal.</i>	<i>February and March 2000</i>
Groundwater	<i>112,605 gallons</i>	<i>Excavation dewatering; water was transported to the Equilon Martinez Refinery for disposal.</i>	<i>February and March 2000</i>

Maximum Documented Contaminant Concentrations---Before and After Cleanup									
Contaminant	Soil (mg/kg)		Groundwater (µg/L)		Contaminant	Soil (mg/kg)		Groundwater (µg/L)	
	Before	After	Before	After		Before	After	Before	After
TPH-gasoline	<i>3,200</i>	<i>840</i>	<i>50,000</i>	<i>200</i>	Ethyl benzene	<i>48</i>	<i>48</i>	<i>1,600</i>	<i><0.5</i>
TPH-diesel	<i>2,200</i>	<i>35.9</i>	<i>18,000</i>	<i>120</i>	Xylenes	<i>170</i>	<i>49</i>	<i>11,000</i>	<i><0.5</i>
Benzene	<i>26</i>	<i>3.4</i>	<i>3,200</i>	<i><0.5</i>	MTBE	<i>0.078</i>	<i>0.068</i>	<i>273</i>	<i><5.0</i>
Toluene	<i>100</i>	<i>8.7</i>	<i>6,000</i>	<i><0.5</i>	Naphthalene	<i><0.05</i>	<i><0.05</i>	<i>--</i>	<i>--</i>
Chromium	<i>56</i>	<i>56</i>	<i>--</i>	<i>--</i>	Lead	<i>ND</i>	<i>ND</i>	<i>--</i>	<i>--</i>
Nickel	<i>55</i>	<i>55</i>	<i>--</i>	<i>--</i>	Cadmium	<i>ND</i>	<i>ND</i>	<i>--</i>	<i>--</i>
Zinc	<i>82</i>	<i>82</i>	<i>--</i>	<i>--</i>	PAH	<i>ND</i>	<i>ND</i>	<i>--</i>	<i>--</i>
CVOC	<i>ND</i>	<i>ND</i>	<i>--</i>	<i>--</i>	TBA	<i>--</i>	<i>--</i>	<i>ND</i>	<i>ND</i>

Notes: mg/kg = milligrams per kilogram; µg/L = micrograms per liter; TPH = Total Petroleum Hydrocarbons; MTBE = Methyl Tertiary Butyl Ether; PAH = polycyclic aromatic hydrocarbon; CVOC = chlorinated volatile organic compound; TBA = tertiary-butyl alcohol; -- = Not analyzed; ND = not detected

"Before" concentrations in soil are from samples collected from borings drilled in 1992 and 2000 prior to excavation.

"After" concentrations in soil are from samples collected from borings drilled in 1987, 1988, 1990, 1992, 2000, and 2017.

"Before" concentrations in groundwater are from grab samples collected from excavation in 1992, except for MTBE collected from a monitoring well in 2001.

"After" concentrations in groundwater are from samples collected from monitoring wells during alternating semi-annual monitoring and sampling events in 2011 and 2012.

Case Closure Summary (Page 3 of 5)

Leaking Underground Fuel Tank Program

III. Release and Site Characterization Information (Continued)

Comments:

Site History: *This site is a former Texaco Service Station operating from the early 1970s to 1988. The service station was transferred to Exxon Company, USA, in 1988 and Exxon continued operation of the site until 1992, after which the station was closed and decommissioned. This site is currently a vacant lot; however, the owner is planning on redeveloping the site for commercial use in the future. In 1986, a single-walled steel waste oil UST was removed and replaced with a double-walled steel waste oil UST. In November 1992, four USTs were excavated and removed from the site. Groundwater contamination was first discovered at the site during a groundwater investigation in 1986. Since that time, several phases of soil and groundwater investigations were conducted, including the installation of 11 groundwater and 2 vapor monitoring wells and the drilling of 80 boreholes on-site and off-site. The locations of all the boreholes and monitoring wells are shown on Figures 2 and 3. As shown above in "Treatment and Disposal of Affected Material," soil and groundwater remedial actions were conducted at the site during 1992 and 2000.*

IV. Low-Threat UST Case Closure Policy Review

In accordance with the State Board's "Low-Threat UST Case Closure Policy" (Policy), ACWD reviewed the case files for this site and determined that the site meets all eight General Criteria and all three Media-Specific Criteria of the Policy and is eligible for closure, as follows:

General Criteria:

- a. *The unauthorized release is located within the service area of a public water system (ACWD);*
- b. *The unauthorized release consists only of petroleum;*
- c. *The unauthorized ("primary") release from the UST system has been stopped;*
- d. *Free Product has been removed to the maximum extent practicable (no free product has ever been observed in the monitoring wells);*
- e. *A conceptual site model that assesses the nature, extent, and mobility of the release has been developed;*
- f. *Secondary source has been removed to the extent practicable;*
- g. *Soil and groundwater has been tested for methyl tert-butyl ether (MTBE) and results reported in accordance with Health and Safety Code section 25296.15; and*
- h. *Nuisance as defined by Water Code section 13050 does not exist at the site.*

Media-Specific Criteria:

1. *Groundwater: The site satisfies the media-specific criteria for groundwater since the contaminant plume that exceeds water quality objectives is stable and decreasing in areal extent, and meets all of the additional characteristics of Class 4, as follows: a) the contaminant plume that exceeds water quality objectives is less than 1,000 feet in length; b) there is no free product; c) nearest sensitive receptor is greater than 1,000 feet from the defined plume boundary; and d) the dissolved concentration of benzene is less than 1,000 micrograms per liter ($\mu\text{g/l}$), and the dissolved concentration of MTBE is less than 1,000 $\mu\text{g/l}$.*
2. *Petroleum Vapor Intrusion to Indoor Air: The site satisfies the petroleum vapor intrusion to indoor air requirements based on Scenario 4, Soil Gas Sampling – With Bioattenuation Zone. The soil vapor samples of 2017 documented benzene ($<4.2 \mu\text{g/m}^3$) which is below the residential soil gas criteria of*

Case Closure Summary (Page 4 of 5)
Leaking Underground Fuel Tank Program

IV. Low-Threat UST Case Closure Policy Review (Continued)

Scenario 4 of $<85 \mu\text{g}/\text{m}^3$ for benzene. Naphthalene was detected at concentrations $<14 \mu\text{g}/\text{m}^3$ which is below the residential soil gas criteria of scenario 4 of $<93 \mu\text{g}/\text{m}^3$ for naphthalene. Ethylbenzene was detected at concentrations $<5.7 \mu\text{g}/\text{m}^3$ which is less than the residential soil gas criteria of scenario 4 of $<1,100 \mu\text{g}/\text{m}^3$ for ethylbenzene.

3. *Direct Contact and Outdoor Air Exposure: The site satisfies the media-specific criteria 3.a. for direct contact and outdoor air since the maximum concentrations of benzene, ethyl benzene, naphthalene, and PAH in soil are less than those listed in Table 1 of the Policy for residential use for 0 to 5 feet bgs.*

Comments:

Residual Contamination

Although this Site satisfies the media-specific criteria of the Policy (i.e., groundwater, vapor intrusion to indoor air, and direct contact and outdoor air exposure), the Policy allows elevated concentrations of petroleum hydrocarbons to remain at the site provided that the criteria in the Policy are satisfied at the time of closure. The following is a summary of the contaminants remaining at the site, which may require the implementation of the "Site Management Requirements" outlined in Section V, Closure:

Soil: *Although the concentrations of all petroleum hydrocarbons detected in soil are less than the criteria in the Policy for direct contact and outdoor air exposure, elevated concentrations of TPH-gasoline (840 mg/kg) still remain at a depth of 9.5 feet bgs in well MW-9(see Figure 2). Because the wells surrounding MW-9 have relatively low concentrations of TPH-g, it can be concluded that the elevated concentrations are localized to MW-9. Additionally, there are plans to redevelop this site for commercial use in the future. The residual contamination does not pose a threat to human health for this type of land use. However, if there is a proposal to redevelop the site for residential use, additional soil sampling should be conducted.*

Groundwater: *As shown on Figure 3, despite meeting the Low-Threat Closure Policy's criteria for groundwater, the most recent groundwater samples collected from the monitoring wells on July 15, 2011, and January 11, 2012, documented elevated concentrations of TPH-gasoline (200 $\mu\text{g}/\text{l}$) and TPH-diesel (120 $\mu\text{g}/\text{l}$), respectively. Therefore, prior to any proposed use of groundwater (e.g., use of a water well) in the vicinity of the site, groundwater samples should be collected to confirm that groundwater is not impacted by petroleum hydrocarbons, which could impact its intended use.*

V. Closure

Does the completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? **Yes**

Does the completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? **Yes**

Site Management Requirements: *Residual contamination in both soil and groundwater remains at the Site that could pose an unacceptable risk under certain development activities such as grading, excavation, or installation of water wells. Therefore, the impact of the disturbance of any residual contamination or the installation of water well near the residual contamination shall be assessed and appropriate action taken so that there is no significant impact to human health, safety, or the environment. This could necessitate additional sampling, health risk assessment, and mitigation measures. The Alameda County Water District, and the appropriate planning and building department must be notified prior to any changes in land use, grading activities, excavation, and installation of water wells. This notification must include a statement that residual contamination exists on the property and list all mitigation actions, if any, necessary to ensure compliance with this site management requirement. The levels of residual contamination and any associated site risks are*

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Leaking Underground Fuel Tank Program

V. Closure (Continued)

expected to reduce with time.


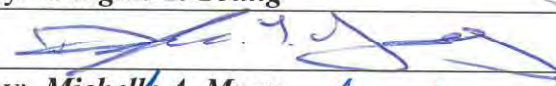
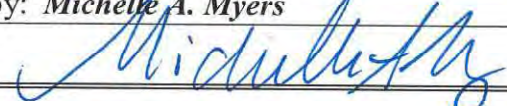
Should corrective action be reviewed if land use changes? <i>Yes</i>			
Monitoring wells destroyed?	<i>Yes</i>	Number destroyed: <i>13</i>	Number remaining: <i>0</i>
List enforcement actions taken:	<i>None</i>	List Enforcement Actions Rescinded : <i>Not Applicable</i>	

Were all of the record fee title owners notified of the proposed closure in accordance with Section 25297.15 (a) of Chapter 6.7 of the health and Safety Code? *Yes. In addition, on April 26, 2018, a public notification of the proposed case closure was distributed to all interested parties in accordance with the requirements of the Low-Threat Closure Policy, which included a 60-day public comment period. The 60-day public comment period was from April 26, 2018, through June 25, 2018, no comments were received. All of the remaining monitoring wells were destroyed between October 1 and 3, 2018, and all waste piles, drums, debris, and other investigation derived or remediation derived materials were removed from the site on November 1, 2018.*

VI. Technical Reports and Other Documents That This Closure Recommendation Was Based Upon

Report/Document Title	Issuance Date
Second Annual 2011 Monitoring Report	09/02/2011
SCM and Low-Threat Closure Request	09/23/2014
MW-3 Analytical Results	05/09/2016
Updated Review Summary Report	07/26/2016
SCM Data Gap and LTC Request for Closure	10/13/2017

VII. Local Agency Representative Data

Prepared by: <i>Kaylee Glenney</i>	Title: <i>Groundwater Resources Intern</i>
Signature: 	
Reviewed by: <i>Douglas T. Young</i>	Title: <i>Groundwater Resources Hydrogeologist</i>
Signature: 	
Reviewed by: <i>Michelle A. Myers</i>	Title: <i>Groundwater Resources Manager</i>
Signature: 	

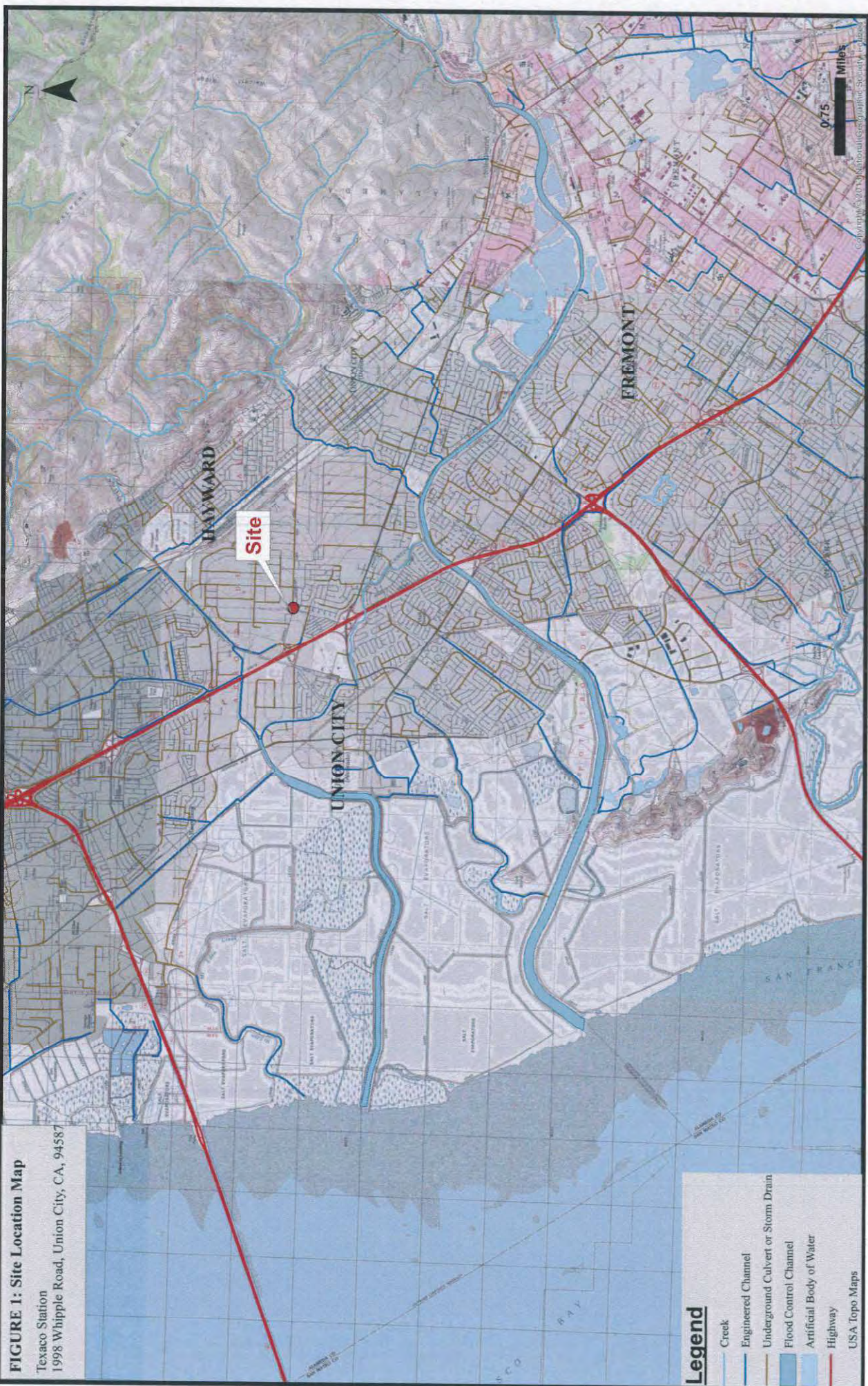


FIGURE 1: Site Location Map

Texaco Station
1998 Whipple Road, Union City, CA, 94587

Legend

- Creek
- Engineered Channel
- Underground Culvert or Storm Drain
- Flood Control Channel
- Artificial Body of Water
- Highway
- USA Topo Maps

