

## CASE CLOSURE SUMMARY

### I. AGENCY INFORMATION

**Preparation Date:**

Agency Name: SF Regional Water Quality Control Board	Address: 1515 Clay Street, Suite 1400
Responsible Staff Person: Jeffrey D. White	Title: Water Resource Control Engineer
Telephone: (510) 622-2375	Email: jeff.white@waterboards.ca.gov

### II. SOURCE PROPERTY INFORMATION

Source Property Facility Name: FDS Section BR11-1				
Source Property Facility Address: 127A, 127B, and 128A Riley Avenue, Presidio of San Francisco, San Francisco, CA 94129				
Regional Water Board Case No.: 38D9327	Local Oversight Program Agency Case No.: N/A	Unauthorized Release Form Filing Date: 11/14/2017		
Underground Storage Tank (UST) Cleanup Fund Expenditure to Date: N/A	UST Cleanup Fund Claim No.: N/A	Number of Years Case Open: 4		
Discharger(s): Presidio Trust representing the U.S. Army (responsible party)				
Attn: Nina Larssen Address: 1750 Lincoln Boulevard, San Francisco, CA 94129 Telephone: (415) 246-3650 Email: nlarssen@presidiotrust.gov				
Tank No.	Size in Gallons	Contents	Closed In—Place/Removed?	Date
127	1,500	Fuel Oil	Removed and disposed offsite	1978

**III. RELEASE AND SOURCE PROPERTY CHARACTERIZATION INFORMATION**

Cause and Type of Release: <u>Leaking fuel distribution lines</u>						
Source Property characterization complete: <u>Yes</u>			Date Closure Approved by Oversight Agency:			
Monitoring wells installed: <u>Yes</u>		Number: <u>3</u>		Proper screened interval? <u>Yes</u>		
Highest Groundwater (GW) Depth Below Ground Surface (bgs) in feet (ft): <u>59.27 feet</u>		Lowest Depth: <u>21.30 feet</u>		Flow Direction: <u>North/Northeast</u>		
Most Sensitive Current GW Use: <u>Groundwater is not used</u>						
Most Sensitive Potential GW Use: <u>N/A</u> Probability of Use: <u>None</u>						
Summary of water wells in vicinity: <u>No water wells in the vicinity of the Site</u>						
Drinking water wells affected: <u>None</u>			Aquifer Name: <u>Colma</u>			
Surface water affected: <u>No</u>			Nearest surface water name: <u>Crissy Field Marsh</u>			
Offsite Beneficial Use Impacts (Addresses/ and GPS Coordinates): <u>None</u>						
Report(s) on file: <u>Yes</u>			Location of report(s) filed: GeoTracker URL: <u>T10000001505</u>			
<b>TREATMENT AND DISPOSAL OF AFFECTED MATERIAL</b>						
<b>Material</b>	<b>Amount (Include Units)</b>	<b>Action (Treatment or Disposal w/Destination)</b>		<b>Date</b>		
Tanks	1 unit	Offsite Disposal by US Army		1978		
Piping	~410 feet	Offsite Disposal by US Army and Presidio Trust		1998 and 2017		
Petroleum Free Product	None	None		N/A		
Soil	~98 cubic yards	Offsite Disposal		1998 and 2017		
Groundwater	None	None		N/A		
Barrels	None	None		N/A		
<b>MAXIMUM DOCUMENTED POLLUTANT CONCENTRATIONS BEFORE AND AFTER</b>						
<b>Pollutant</b>	<b>Soil (mg/kg)</b>		<b>Water (µg/L)</b>		<b>Soil Vapor (µg/m<sup>3</sup>)</b>	
	<b>Before</b>	<b>After</b>	<b>Before</b>	<b>After</b>	<b>Before</b>	<b>After</b>
TPH-diesel	18,000	18,000	460		39,000	
TPH-gasoline	180	180	83		190,000	

TPH-motor oil	1,600	1,600	300		--	--
TPH-bunker C	--	--	960		--	--
Benzene	<0.001	<0.001	<0.5		21	
Ethylbenzene	0.0054	0.0054	<0.5		37	
Toluene	<0.001	<0.001	0.26		47	
Xylenes	<0.001	<0.001	<0.5		81	
Naphthalene	1.1	1.1	0.07		<130	
Methane	--	--	--	--	2.01%	
<p>Comments: Indoor air assessment were conducted for each of the residential units (127A&amp;B, 128A&amp;B, 129A&amp;B) with results indicating detection of benzene, TPH-d, and TPH-g in indoor were due to ambient air intrusion and/or within typical, 50<sup>th</sup> percentile, background indoor air concentrations per regulatory data (EPA/OSWER, 2011)</p> <p>U.S. Environmental Protection Agency Office of Solid Waste and Emergency Response (EPA/OSWER). 2011. <i>Background Indoor Air Concentrations of Volatile Organic Compounds in North American Residences (1990-2005): A Compilation of Statistics for Assessing Vapor Intrusion</i>. June.</p>						

#### IV. CASE CLOSURE

*This section should explain why the Source Property qualifies for closure or low-threat closure. The Transmittal Letter will indicate whether we've used the low-threat closure criteria from the 2012 SWRCB UST policy or the 1996 R2 supplemental instructions at a particular Source Property. Both sets of criteria are listed below; you should delete the set that doesn't apply at the Source Property including the box around it. You should either (i) list the criteria as is or (ii) use them as section headings and add explanatory text below each header.)*

*(low threat closure criteria from 2012 SWRCB UST policy)*

This case meets the State Water Board's [Low-Threat Underground Storage Tank Case Closure Policy](#) (LTCP) as shown below.

##### General Criteria

- a. The unauthorized release is located within the service area of a public water system: Yes, area is serviced by the Presidio Trust Water Distribution System
- b. The unauthorized release consists only of petroleum: Yes
- c. The unauthorized ("primary") release from the UST system has been stopped: Yes
- d. Free product has been removed to the maximum extent practicable: Yes
- e. A conceptual site model that assesses the nature, extent, and mobility of the release has been developed: Yes
- f. Secondary source has been removed to the extent practicable: Yes
- g. Soil or groundwater has been tested for methyl tert-butyl ether (MtBE) and results reported in accordance with Health and Safety Code section 25296.15: No, fuel oil/diesel only release
- h. Nuisance as defined by Water Code section 13050 does not exist at the Site: No

**Media-Specific Criteria**

**Groundwater.** *Has a stable or decreasing contaminant plume and fits into at least one of the five classes of Source Properties for groundwater plume length.*

Yes meets Groundwater-Specific Criteria (2) with the exception of the MTBE analysis which was not necessary due to the fuel oil/diesel release:

- (2) a. The contaminant plume that exceeds water quality objectives is less than 250 feet in length.
- b. There is no free product.
- c. The nearest existing water supply well or surface water body is greater than 1,000 feet from the defined plume boundary.
- d. The dissolved concentration of benzene is less than 3,000 micrograms per liter ( $\mu\text{g/l}$ ), and the dissolved concentration of MTBE is less than 1,000  $\mu\text{g/l}$ .


**Petroleum Vapor Intrusion to Indoor Air.** *The Source Property is considered low-threat for vapor intrusion to indoor air if Source Property-specific conditions satisfy all of the characteristics of one of the three classes of Source Properties (a through c) or if the exception for active commercial fueling facilities applies.*

Vapor intrusion is mitigated by the Vapor Mitigation System (VMS) installed beneath Building 127B, existing concrete slabs at Buildings 127A and 128A, and implementation of institutional controls including the establishment of Land Use Control areas and annual site inspections.

**Direct Contact and Outdoor Air Exposure.** *Meets at least one of the specific criteria (a through c).*

Satisfies Criteria C

Direct Contact and Outdoor Air Exposure are mitigated by engineering controls including a cap consisting of minimum 2-feet non-impacted soil on landscaped area and hardscape consisting of concrete walkways and patios. Institutional controls include Land Use Control areas and annual site inspections

This case qualifies for closure pursuant to the State Water Board's [Low-Threat Underground Storage Tank Case Closure Policy](#) (Policy). 

## V. SOURCE PROPERTY MANAGEMENT

<p><b>General:</b> There may be residual petroleum-contaminated soil and groundwater at this Source Property 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 Source Property or change to a more sensitive land use. Contractors performing subsurface activities at the Source Property 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.</p>	
<p>Should corrective action be reviewed if land use changes?: Yes, the Presidio Trust has implemented land use controls (LUCs) at Buildings 127A, 127B and 128A to ensure the protection of public health, safety and the environment. Land use changes and projects in Area B of the Presidio are screened for compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA), collectively referred to as N<sup>2</sup>. The N<sup>2</sup> review is an interdisciplinary review process ensuring that rehabilitation efforts comply with NEPA and NHPA and considers potential impacts to environmental, historic, and archeological resources during project planning. The N<sup>2</sup> process is a first step of making project proponents aware of known contamination and associated LUCs at a project site. Another mechanism for notifying and ensuring compliance with LUCs and LUNs is the Presidio Trust building and dig permit process. Any project involving construction, excavation, or subsurface work in Area B of the Presidio requires a permit. Dig Permits are tracked and reported annually via the Annual O&amp;M Reports.</p>	
List Enforcement Actions Taken: None	List Enforcement Actions Rescinded: N/A
Number of Wells Destroyed: None. The three on-site groundwater monitoring wells shall be properly decommissioned and documentation of well decommissioning submitted to the Regional Water Quality Control Board	Number Retained: No groundwater monitoring wells are scheduled for retention.

## VI. TECHNICAL REPORTS AND OTHER DOCUMENTS THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Report/Document Title	Issuance Date
October 2021 Semi-Annual Groundwater Monitoring Report and Request for Site Closure	TRC, December 2021
Site-Specific Land Use Control Addendum to the Presidio Trust Land Use Controls Master Reference Report, Fuel Distribution System   Section BR11-1, Buildings 127A, 127B, and 128A	TRC, April 2020
Revised Feasibility Study and Corrective Action Plan, Fuel Distribution System   Section BR11-1, Buildings 127A, 127B, and 128A	TRC, January 2020

Building 127B Second Post-Construction Sampling Report and No Soil Vapor Intrusion Risk Determination Request	TRC, November 2019
Construction Completion Report, Vapor Mitigation System, Building 127B Riley Avenue, Section BR11-1 Fuel Distribution System	TRC, August 2019
Revised Section BR11-1 Supplemental Site Investigation Report, Fuel Distribution System	TRC, August 2019
Revised Request for Final Concurrence – No Soil Vapor Intrusion Risk and No Further Action Determination, Building Unit 127A Riley Avenue	TRC, September 2018
Request for Final Concurrence – No Soil Vapor Intrusion Risk and No Further Action Determination, Buildings 128A and 129B Riley Avenue	TRC, August 2018
Request for Final Concurrence – No Soil Vapor Intrusion Risk and No Further Action Determination, Buildings 128B and 129A Riley Avenue	TRC, June 2018

This document and the related CASE CLOSURE LETTER shall be retained by the lead agency as part of the official Source Property file