MEMORANDUM

Date: April 24, 2025

To: File

From: Kent Huth
Engineering Geologist
North Coast Regional Water Quality Control Board

Subject: CASE STATUS,
MOUNTAIN VALLEY COMPANY, UST CASE 1TMC562,
76325 COVELO ROAD, COVELO, MENDOCINO COUNTY

The North Coast Regional Water Quality Control Board (Regional Water Board) oversees the subject Underground Storage Tank (UST) site.

The site formerly operated as an automotive service business that utilized a waste oil tank. Although no documentation is available, it is understood that the UST was removed in 2004 without permit or regulatory oversight. All structures were removed at approximately this time and the property is currently vacant. Two drinking water wells are present at the property but not currently in use.

In 2004, Harris & Lee oversaw an excavation in the area of the former UST cavity, collecting soil samples and analyzing for TRPH and metals. Groundwater was encountered at a depth of approximately 6 to 7 feet below ground surface (bgs). Following this, the Regional Water Board requested a work plan for additional investigation of soil and groundwater under direction of a licensed professional geologist or engineer.

The case was stalled until July 30, 2020 when a Phase I Environmental Site Assessment was submitted which compiled a history of on-site impacts but the document was not submitted by environmental professional and did not contain recommendations for further action.

An Order to Submit Work Plan Pursuant to Health and Safety Code Section 25296.10 Corrective Action Requirements (Order) was issued to Mr. Craig Christensen (Responsible Party) on January 23, 2023. Following this Order, a Work Plan for Site

Investigation was submitted by Trans Tech Consultants. The Work Plan proposed to advance 6 test pits to depths ranging from 3 feet bgs (along the former product line) to 7 feet bgs (former UST cavity area) with soil samples collected from the backhoe bucket. Soil samples were to be collected within each test pit at maximum depth intervals of 2 feet with additional samples collected as needed with changes in lithology, evidence of impacted soil, and just above the soil-groundwater interface. In addition, the Work Plan also proposed to install 3 groundwater monitoring wells to a depth of 20 feet bgs.

Soil samples were to be analyzed for total petroleum hydrocarbons – carbon chain (TPH-cc) by 8015M. The most impacted samples were to be analyzed for volatile organic compounds (VOCs) by 8260B and LUFT 5 metals (Cd, Cr, Pb, Ni, Zn). Groundwater samples were to be analyzed for TPH-cc, VOCs, semi-volatile organic compounds SVOCs, and LUFT 5 Metals.

The Work Plan was approved with the conditions that SVOCs be included within the soil sample suite of analyses and for the southeasterly-proposed well to be installed 20 feet to the northwest of the former UST cavity.

The Summary Report for Site Investigation was submitted on January 20, 2024 and detailed the activities from the approved Work Plan. While the five test pits along the footprint of the former product line were advanced in accordance with the Work Plan, the two UST test pits only extended to 2 and 3.5 feet bgs.

On March 5, 2024, the Regional Water Board issued a Report Response Letter requesting that the wells be professionally surveyed and that four quarterly groundwater monitoring events take place with the three groundwater monitoring wells and two domestic water wells sampled. A Conceptual Site Model (CSM), compiling all site activities, outlining data gaps, and providing conclusions and recommendations for further action, was also required to be submitted to the Regional Water Board by August 15, 2024.

No work has been performed since this time. Mr. Christensen (RP) has indicated that he would like to sell the property to an interested buyer but that has not taken place to date.

The site has been referred to the Emergency, Abandoned, and Recalcitrant (EAR) Fund with a signed Delegation Authority submitted to MyLinh Dunn on February 6, 2025.