
Central Valley Regional Water Quality Control Board

28 June 2023

Mr. Charles Miller
Moller Investment Group, Inc.
6591 Collins Drive, Suite
E-11 Moorpark, CA 93012

***NOTICE OF TERMINATION, USA GASOLINE CORPORATION (T0601300676),
1915 AUTO CENTER DRIVE, ANTIOCH, CONTRA COSTA COUNTY***

Dear Mr. Miller,

On 20 November 2017, the Executive Officer of the Central Valley Regional Water Quality Control Board issued to Moller Investment Group, Inc. (Moller) a Notice of Applicability (NOA) under Order No. R5-2015-0012, Waste Discharge Requirements General Order for In-Situ Groundwater Remediation and Discharge of Treated Groundwater to Land. In the NOA, the Monitoring and Reporting Program (MRP) was assigned site specific Order No. R5-2015-0012-018.

The in-situ groundwater remediation project consisted of injection of ozone into groundwater to treat petroleum hydrocarbon impacts to groundwater. Prior to application and issuance of the NOA, Stratus Environmental, Inc. (Stratus) initiated ozone injection on 3 February 2011.

In January 2012, Moller retained Environ Strategy Consultants, Inc., now Montrose Environmental (Montrose), as its environmental consultant. Between 23 March 2015 and 31 December 2020, Montrose ran the ozone injection system intermittently in either ozone injection or oxygen injection mode. The system operated intermittently due to repair requirements. Montrose restarted the system, operating with oxygen injection only, on 28 December 2015.

In a letter dated 8 January 2016, Central Valley Water Board staff requested submission of a Notice of Intent (NOI) to continue ozone injection or a proposal for an alternative remedial method. Ozone injection was terminated due to detections of hexavalent chromium and bromate, and Montrose again operated the system in oxygen injection mode starting on 31 December 2018. Montrose permanently shut down the system on 4 September 2020 to begin post remedial monitoring. Montrose is not planning further ozone or oxygen injection.

In a letter dated 8 March 2023, Montrose concluded that the remediation did not degrade water quality. On behalf of Moller, Montrose requested termination of the NOA and MRP.

Based on staff review of Site data, the action levels were based on pre-pilot test samples. Montrose performed five monitoring events after injection, and hexavalent chromium and bromate were not detected in compliance wells, however the reporting limit was elevated due to the laboratory method. While the reporting limit of samples collected after remediation were elevated, treatment zone wells did not exceed background concentrations or action levels for bromate or hexavalent chromium for many years during the treatment period. Since the formation of bromate and hexavalent chromium through the means of oxidation are typically immediate reactions, we believe that the water quality results reported during the treatment period are accurate in representing the post treatment period water quality results as well. Thus, Central Valley Water Board staff concurs that termination of the NOA is appropriate.

The Notice of Applicability under General Order R5-2015-0012 and the MRP requirements under R5-2015-0012-018 are hereby terminated as of the date of this letter. If you have any questions, please contact Vera Fischer at (916) 464-4792 or vera.fischer@waterboards.ca.gov.

Sincerely,

For Patrick Pulupa
Executive Officer

cc: Mr. Chris Guesnon, Montrose Environmental Solutions, LLC, Santa Ana (email)
CIWQS Program Support Staff (email)