



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**PUBLIC HEALTH SERVICES
ENVIRONMENTAL HEALTH**



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December 20, 2013

Ben Heningburg
State Water Resources Control Board
1001 I Street, P.O. Box 2231
Sacramento, CA 95812

Subject: Comment Letter to State Water Resources Control Board's Public Notification of G&M Oil No. 140 Proposed UST Case Closure Petition

**Re: Underground Storage Tank (UST) Case
G&M Oil Station #140
8032 Garden Grove Boulevard
Garden Grove, CA 92844
OCHCA Case #11UT001**

Dear Mr. Heningburg:

The Orange County Health Care Agency (OCHCA) has reviewed the UST case summary prepared by State Water Resources Control Board (SWRCB) dated October 2013 recommending case closure. Based on the review of the case file, the OCHCA respectfully submits the following comments for consideration by the SWRCB prior to consideration for site closure under the SWRCB low-threat closure policy (LTCP):

1. The referenced site does not meet the general criteria presented in the LTCP as the groundwater assessment is incomplete, site conceptual model is incomplete, and remediation has not been attempted to date by G&M Oil Company who is the current responsible party for the site. In the subject document, SWRCB staff states that G&M Oil conducted groundwater assessment and remediation during the investigation at the Shell Oil site located at 12950 Beach Boulevard, Stanton (upgradient to the G&M site). This statement is incorrect and contradicts the case summary presented in Attachment 2 of the subject document that no corrective actions were performed at the site. It should be noted that monitoring wells MW-1 through MW-5 currently located at G&M site were installed and sampled by Shell Oil. There

has been no site assessment, remediation, or groundwater monitoring conducted by G&M Oil at the referenced site since the cleanup case was opened in 2011.

2. Historic groundwater data shows TBA in wells MW-1 and MW-2 at a maximum concentrations of 73,000 µg/L and 100,000 µg/L, respectively, during well installation in April 2008. Records also show groundwater flow direction at the G&M site is northwest to west, towards Garden Grove Boulevard and Beach Boulevard. As no active remediation was attempted on-site at the G&M station property, it remains unclear if the TBA plume detected in the source area (USTs and dispensers) has migrated off-site. Additional assessment is necessary to address the elevated TBA in groundwater at the G&M site.
3. In a SWRCB e-mail addressed to OCHCA in September 2013, the SWRCB indicated that their staff's rationale for meeting the LTCF was that it appears an unauthorized release from a UST did not occur at the G&M site. During a telephone conference call meeting with SWRCB staff held in September 2013, results of a *Limited Phase II Environmental Site Assessment Report dated March 2005* prepared by a 3rd party as part of a real estate transaction was discussed. A copy of the report was also submitted to the SWRCB for review. The findings presented in the assessment report do not appear to have been considered in the subject document. Results showed elevated MTBE in soil at shallow depths of 5 feet below grade up to a maximum of 48 mg/kg and elevated TBA in groundwater at a maximum of 101,000 µg/L in the vicinity of suspected source area. These results indicate an authorized release did occur at the G&M site along with groundwater plume migration likely from the Shell Station located to the north of G&M site across Garden Grove Boulevard. Soil and groundwater delineation is not complete in the vicinity of the source area and off-site to the west on Beach Boulevard.
4. Drinking water is provided to the surrounding community by Golden State Water Company. The subject document states that it is unlikely that groundwater will be used as a source of drinking water or any other beneficial use currently and in the foreseeable future. It should be noted that this site is located in the pressure zone of the Orange County Groundwater Basin that has several groundwater production wells used as source of drinking water for Orange County residents. It is important to note that water in this area is also produced from a number of small system wells that are screened less than 200 feet below grade. There are several active supply wells installed decades ago that have shallow well seal depth or no documented sanitary seal. Other leaking UST sites in this area have demonstrated diving plumes of fuel oxygenates below water table that have migrated off-site toward large system wells.

The OCHCA concludes that case closure without additional assessment is premature due to lack of sufficient data to determine if the current groundwater concentrations are increasing or stable. Attachment 2 to the UST case summary does not provide any technical basis to show that the remaining petroleum constituents in soil and groundwater do not pose a risk to human health, safety, or the environment. As such, the OCHCA respectfully requests that the SWRCB reconsider the recommendation for case closure at this time, until additional assessment is conducted by G&M Oil and a stable or decreasing trend can be confirmed.

Ben Heningburg
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If you have any questions, please contact Shyamala K. Sundaram at (714) 433-6262 or Geniece Higgins at (714) 433-6260.

Sincerely,



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Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health



Geniece Higgins
Supervising Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health

cc: Ken Williams, Santa Ana Regional Water Quality Control Board (electronic copy)
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Roy Herndon, Orange County Water District, Fountain Valley, CA (electronic copy)
Toby Moore, Golden State Water Company (electronic copy)
UST Cleanup Fund Manager, State Water Resources Control Board (electronic copy)
Jennifer Talbert, G&M Oil Company, LLC (electronic copy)
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