



G&M Oil Company, Inc.
G&M Oil Co., LLC

December 26, 2013

VIA Email: USTClosuresComments@waterboards.ca.gov

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

RE: G&M Oil Company Station #140
8032 Garden Grove Boulevard
Garden Grove, CA 92844
OCHCA Case #11UT001
*Comment Letter - G&M Oil No. 140 Proposed Case Closure
Clarification to OCHCA letter dated December 20, 2013*

RE: Shell Oil, Stanton
12950 Beach Boulevard
Stanton, CA 90680
OCHCA Case #89UT155
Comment Letter - Shell Oil, Stanton Proposed Case Closure

Dear Mr. Heningburg:

G&M Oil Company (G&M) would like to submit the following comments in regards to the referenced proposed case closure notices (G&M Station #140 & Shell Oil, Stanton). It is our opinion that the contaminant plume remaining between the Garden Grove Boulevard, the portion of G&M site and Beach Boulevard is a result of the release from the Shell station. Therefore, any regulatory action required or completed should be consistent for both notices.

Furthermore, in response to the Orange County Health Care Agency (OCHCA) letter dated December 20, 2013, recommending that the State Water Resources Control Board (SWRCB) should reconsider recommendation for case closure for the G&M site, the following comments were generated for clarification:

1. OCHCA letter dated December 20, 2013, indicates that no corrective action was performed by G&M Oil Company (G&M) since the cleanup case was opened in 2011. In a G&M letter dated

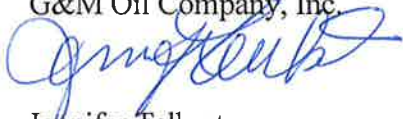
February 21, 2011, G&M issued a response to the "Notice of Responsibility" to OCHCA requesting that G&M be removed from the responsible party (RP) list citing several rational. Please see **Appendix A** for the letter and rational. To date, there has been no determination from OCHCA or the SWRCB on G&M's request to be removed as a responsible party.

2. In July 2012, OCHCA generated a comment letter dated July 13, 2012, to Former Shell Service Station located at 12950 Beach Boulevard, Stanton, CA referencing G&M's response letter and stating that OCHCA had requested the SWRCB to evaluate the petition considering both cases together under the review process. Also, at that time, no additional assessment was anticipated at the former Shell Station and G&M sites until the petition review was resolved and finalized. Please see **Appendix B** for OCHCA letter dated July 13, 2012.

Based on this information, G&M did not negate any OCHCA requests for site assessment at the subject site since the case was opened in 2011. G&M was under the assumption that the SWRCB was reviewing the RP request for reconsideration based on the OCHCA letter dated July 13, 2012 to former Shell Station located at 12950 Beach Boulevard, Stanton, CA. It is still the position that G&M should be removed from the RP list based on the reasoning described in the G&M letter dated February 21, 2011 (**Appendix A**), which also address the shallow soil concentration concern detected during the limited phase II assessment conducted in March 2005 for a property transaction screening at the subject property. To date, no response has been received from either the OCHCA or Santa Ana Regional Water Quality Control Board regarding the G&M petition.

It is G&M's opinion that any further assessment or remedial efforts that may be required for the remaining plume should be completed by Shell and G&M would reiterate our request to be removed as a listed RP. It is also noted that the current groundwater concentrations for wells located on both properties (reported in the *Third quarter 2013 Groundwater Monitoring and Status Report*, dated October 16, 2013 prepared by Wayne Perry for the Shell station) remain favorable for Low Threat Closure Policy (LTCP) and any regulatory action required or completed should be consistent for both notices. If you have any questions, please contact the undersigned at (714) 475-6324.

Sincerely,
G&M Oil Company, Inc.



Jennifer Talbert
Vice President

cc: Ms. Shyamala K. Sundaram, OCHCA (w/1 enclosure)

*Clarification to OCHCA Letter dated Dec. 20, 2013
G&M Oil Company Station #140
Garden Grove, California*

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December 26, 2013*

Mr. Ken Williams, SARWQCB (w/1 enclosure)
Mr. David Bolin, OC Water District (w/1 enclosure)
Mr. Roy Herndon, OC Water District (w/1 enclosure)
Mr. Toby Moore, Golden State Water Company (w/1 enclosure)

APPENDIX A

Jennifer L. Talbert
Vice President



G&M Oil Company, Inc.
G&M Oil Co., Inc., LLC

February 21, 2011

Ms. Shyamala K. Sundaram
Orange County Health Care Agency
Environmental Health Division
1241 East Dyer Road, Suite 120
Santa Ana, California 92705

RE: G&M Oil Co., LLC Station #140
8032 Garden Grove Boulevard
Garden Grove, CA 92844
Response to Notice of Responsibility
OCHCA Case #11UT001

Dear Ms. Sundaram:

As requested in the Orange County Health Care Agency's *Notice of Responsibility*, dated January 20, 2011, G&M Oil Co., LLC (G&M) retained Atlas Environmental Engineering, Inc. (ATLAS) to submit the current record owner of fee title for the subject site. This was sent to your office under separate cover dated February 17, 2011. OCHCA has indicated that G&M is partially responsible for the TBA present in the groundwater beneath the G&M Chevron and in the area of Garden Grove Blvd. This letter requests that OCHCA remove G&M from the responsible party list and offers the following in consideration of this request.

The subject site (G&M Chevron) located south of the Former Shell Service Station (Shell Station) completed installation and startup activities in September 2000. Prior to that date no underground storage tanks were present on the property. Therefore, the initial installation met the more stringent standards for underground storage tank installations. Further, no records reviewed by our office indicated a release occurring or a failed system test that would constitute a discharge into the environment.

On the other hand, the Former Shell Station to the north across Garden Grove Blvd. has a documented discharge that occurred in August 1989. This discharge was apparently significant as separate phase hydrocarbons (SPH) or free product was noted on the water table. A total of 29 gallons of SPH was reportedly recovered from 1989 to 1993. In addition, soil and groundwater treatment was accomplished from March 1994 to May 1996 followed by oxygen injection from August 2006 through 2009. No remedial efforts were accomplished from 1996 to 2006 and it is unclear if the groundwater extraction wells (GWE-1 to GWE-6) installed in 2005 in Garden Grove Blvd. (GWE-1 to GWE-6) were ever utilized for groundwater recovery.

Significant assessment has been accomplished at and south of the Former Shell Station. The groundwater

flow has been reported historically as south to southwest from the Former Shell Station. G&M reviewed data from monitoring wells that were installed prior to 2001 in order to establish the concentration trends prior to the G&M Chevron operations. Specifically, MTBE and TBA concentrations were reviewed from wells located in Garden Grove Blvd. Groundwater from well B-13 exhibited 21 ug/L MTBE in April 2001. In September 2001, groundwater from the well exhibited 49,000 ug/L MTBE and 22,000 ug/L TBA. This well is centrally located between the two sites in Garden Grove Blvd. It seems unlikely at best that within less than a year of installation that a double-walled tank system meeting all current regulatory standards could have a discharge that would travel over 120 feet. A more likely scenario would be the detectable presence of MTBE and TBA reaching well B-13 from a significant documented release in 1989 traveling in the direction of groundwater flow approximately 80 feet from the established source.


By November 2003, two additional wells, B-15 and B-16, were also installed in Garden Grove Blvd. The initial sample collected from B-15 indicated 42 ug/L MTBE and 13,000 ug/L TBA. The initial sample from B-16 indicated 11 ug/L MTBE and 530 ug/L TBA. Again, it is unlikely at best to consider that the newly installed tank system (by then approximately 3 years old) would produce concentrations of MTBE and TBA about 80 feet from the tank pit and further from any piping runs. A more likely scenario would be a continuation of the contaminant plume already established in B-13 and originating from the Former Shell Station. Please note that during this period no remedial efforts were conducted at the Former Shell Station.

It is noted that low concentrations of TBA were noted in soil samples collected from the G&M Chevron at depths as shallow of 5 feet. Review of recent groundwater data indicates that groundwater has been as shallow as 8 feet below ground surface at the site. It is not unreasonable to associate these shallow detections to the impacted groundwater plume.

Lastly, G&M understands that Shell has requested closure of the environmental file associated with their release. G&M would request that OCHCA deny this closure request until review of the information submitted and any gaps in the data are addressed. If you have any questions, please contact the undersigned at (714) 375-4700.

Sincerely,

G&M Oil Co., LLC


Jennifer Talbert

Vice President

cc: Mr. Ken Williams, SARWQCB
✓Mr. Karl Kerner, ATLAS

APPENDIX B



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**PUBLIC HEALTH SERVICES
ENVIRONMENTAL HEALTH**

MARK A. REFOWITZ
INTERIM DIRECTOR

DAVID M. SOULELES, MPH
DEPUTY AGENCY DIRECTOR

RICHARD SANCHEZ, REHS, MPH
DIRECTOR
ENVIRONMENTAL HEALTH

MAILING ADDRESS:
1241 E. DYER RD., #120
SANTA ANA, CA 92705-5611

TELEPHONE: (714) 433-6000
FAX: (714) 754-1732
E-MAIL: ehhealth@ochca.com



July 13, 2012

Andrea Wing
Shell Oil Products US
HSE/Science and Engineering
20945 S. Wilmington Ave.
Carson, CA 90810-1039

Subject: First Quarter 2012 Groundwater Monitoring and Status Report dated May 9, 2012 prepared by Wayne Perry, Inc.

Re: Former Shell Service Station
12950 Beach Boulevard
Stanton, California
OCHCA Case #89UT155

Dear Ms. Wing:

The Orange County Local Oversight Program (OCLOP) has reviewed the subject report that documents groundwater monitoring and sampling activities conducted at the referenced site during 1st quarter 2012 reporting period. The report states additional groundwater monitoring is not warranted and should be discontinued at the site. Based on the review, the OCLOP has the following comments:

1. Shell Oil Products US (Shell) had petitioned this case to the State Water Resources Control Board (SWRCB) in November 2010 which was subsequently filed by the SWRCB in January 2011. The OCLOP's petition response letter to the SWRCB in March 2011 stated the reasons for denying the Shell case closure request. A conference call meeting was held at this Agency with all interested parties including SWRCB staff in October 2011 to discuss the conceptual site model and petition. The OCLOP is now awaiting a formal decision by the SWRCB regarding the petition. Based on the SWRCB decision regarding the Shell petition, the OCLOP will determine the scope of work and whether to implement additional assessment activities at the G&M Oil located down gradient of the former Shell Station.
2. Although no additional assessment has been conducted at the G&M Oil site in the past year, it should be noted that this Agency received a letter from G&M Oil Company on February 17, 2011 which stated their intent to petition the Agency's decision to open a case and identify G&M Oil as a responsible party. Please note that it is the position of G&M Oil Company that the groundwater contamination at their site is the result of petroleum hydrocarbon release at the former Shell Station and plume migration south towards Garden Grove Boulevard and the G&M Station. This Agency

Andrea Wing
July 13, 2012
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had requested SWRCB to evaluate the petition considering both cases together under the review process.

At this time, no additional assessment is anticipated at the former Shell Station and G&M Station sites until the petition review is resolved and finalized.

If you have any questions, please contact me at (714) 433-6262.

Sincerely,



Shyamala K. Sundaram
Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health

cc: Carl Bernhardt, Santa Ana Regional Water Quality Control Board (electronic copy)
Erica J. Rodriguez, Wayne Perry, Inc. (electronic copy)
Jennifer Talbert, G&M Oil Company, LLC (electronic copy)
Karl Kerner, Atlas Environmental (electronic copy)
Russell Hanson, State Water Resources Control Board, Sacramento, CA (electronic copy)