



**Golden State**

Water Company

A Subsidiary of American States Water Company

January 9, 2014

VIA EMAIL to [USTClosuresComments@waterboards.ca.gov](mailto:USTClosuresComments@waterboards.ca.gov)

Ms. Vivian Gomez-Latino  
State Water Resources Control Board  
1001 I Street  
P.O. Box 2231  
Sacramento, CA 95812

**Re: Comment Letter – Shell Oil, Stanton (89UT155) and G&M Oil No. 140 (11UT001) Proposed Case Closures**

On December 20, 2013 we learned of an opportunity for public comment solicited by your agency on November 17, 2013 for the subject underground storage tank (UST) sites. We were granted an extension of the December 27, 2013 comment period deadline by the Chief Deputy Director of your agency, Mr. Jonathan Bishop, until January 10, 2014.

Based on review of some of the publically available documents related to the two sites (e.g., see

[http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T10000002773](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000002773) and [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0605900387](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0605900387))

Golden State Water Company (GSWC) respectfully offers the following comments:

- GSWC owns and operates two public water-supply wells within approximately a one-mile radius of the UST sites (not including a destroyed well formerly owned by GSWC).
- The uppermost perforations in these wells are 200 and 500 feet below ground surface (approximately 145 and 445 feet below mean sea level).

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- Methyl-tert-butyl ether, a contaminant with relatively high mobility in groundwater, has historically been detected in shallow groundwater at the UST sites exceeding drinking water standards.
- A downward vertical groundwater gradient appears to exist at the UST sites from the shallowest aquifer to the deeper principal water-supply aquifers in the area.
- The deepest characterization of shallow groundwater seems to be only approximately 40 feet below ground surface, based on the depth of the bottom of the screen interval for one or more monitoring wells installed at the UST sites. And, it is unclear whether a conceptual site model has been developed, including the location and depth of water-supply wells, and if potential downward migration of petroleum hydrocarbons and fuel oxygenates from the shallow aquifer has been adequately evaluated.

Should you have any questions, please contact me at (714) 535-7711, extension 314.

Sincerely,



Toby B. Moore, PhD  
Water Resources Manager and Chief Hydrogeologist

cc: Robert Hanford, GSWC  
Mark Johnson, GSWC  
Ben Heningburg, State Water Resources Control Board  
Roy Herndon, Orange County Water District  
Shyamala K. Sundaram, Orange County Health Care Agency