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HEALTH CARE AGENCY**

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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 Shell Oil, Stanton Proposed UST Case Closure Petition

**Re: Underground Storage Tank (UST) Case
Shell Oil Station
12950 Beach Boulevard
Stanton, CA 90680
OCHCA Case #89UT155**

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, the OCHCA respectfully submits the following comments for consideration by the SWRCB and clarify following issues contained within the report:

1. The subject notification states that the closure request in June 2009 was effectively denied by OCHCA based on a requirement for four consecutive quarters of verification monitoring prior to evaluating the site for closure. However, it should be noted that the OCHCA letter dated July 2009 was in response to the SWRCB Resolution No. 2009-0042 regarding groundwater monitoring and sampling requirements for the site at that time. The letter was not intended as a response to the closure request as stated in the petition notification.
2. The OCHCA had issued a response to Shell Oil in November 2009 denying the closure request and requiring additional data to support a closure evaluation. However the OCHCA letter dated November 13, 2009 has not been cited or identified in the objections to closure section of the subject document. Please refer to the OCHCA letter in Geotracker.

3. Please note that this site was petitioned by Shell Oil in January 2011 after a meeting with Shell Oil and their consultant (Wayne Perry, Inc.) and the OCHCA to discuss future course of action and additional off-site assessment. At that time, the groundwater contaminant plume was not stable or decreasing in extent as elevated TBA was detected off-site under Garden Grove Boulevard while the site petition review was in progress.
4. Drinking water is provided to the surrounding community by the 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 in the pressure zone of the Orange County Groundwater Basin which has several large system production wells screened below 200 feet below grade and are used as the 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. Finally, there are other leaking UST sites in the pressure zone with fuel oxygenate plumes that have migrated over 1,000 feet from the source area and/or demonstrated diving plumes of fuel oxygenates below water table that have migrated off-site toward large system production wells.

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

Sincerely,



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



Geniece Higgins
Supervising Hazardous Waste Specialist
Hazardous Materials Mitigation Section
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cc: Ken Williams, Santa Ana Regional Water Quality Control Board (electronic copy)
David Bolin, Orange County Water District, Fountain Valley, CA (electronic copy)
Roy Herndon, Orange County Water District, Fountain Valley, CA (electronic copy)
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Andrea Wing, Shell Oil Products US (electronic copy)
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