



Central Valley Regional Water Quality Control Board

29 March 2023

Alzghoul Family Trust
c/o Moe Hamdi, COO Synergy Petroleum Inc.
510 Myrtle Ave #209
South San Francisco, CA 94080

NOTICE OF APPLICABILITY – ORDER NO. R5-2015-0012-080, QUICK-N-SAVE #2, 2057 SOUTH EL DORADO STREET, STOCKTON, SAN JOAQUIN COUNTY, LUST CASE #391086, GLOBAL ID #T0607700901

On your behalf, Stratus Engineering Associates. (Stratus) submitted the following documents:

- *Interim Remedial Action Plan (IRAP)*, dated 4 March 2021
- *Notice of Intent (NOI)*, received 3 May 2022
- *Amendment to the Notice of Intent Application, dated 17 August 2022*

On your behalf, Stratus submitted these documents for the Quick-N-Save #2 underground storage tank (UST) petroleum release case located at 2057 South El Dorado Street in Stockton (Site). In these documents, Stratus proposes ozone injection remediation, along with groundwater extraction, ex-situ treatment, and reinjection of groundwater into the subsurface. In the submitted documents, on your behalf, Stratus requested coverage under *Order R5-2015-0012: Waste Discharge Requirements General Order for In-Situ Groundwater Remediation and Discharge of Treated Groundwater to Land* (General Order). Based on information in these documents, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff concluded that this project meets the required conditions of the General Order. As such, you are assigned **Order No. R5-2015-0012-080**. You are currently monitoring groundwater quality in response to the Site’s petroleum hydrocarbon plume in groundwater. This approved remediation project as described herein will require additional groundwater monitoring in accordance with the enclosed *Monitoring and Reporting Program (MRP)*.

Project Location:

Street Address	2057 South El Dorado Street
City, County:	Stockton, San Joaquin County
Assessor’s Parcel Number (APN):	165-153-090
Latitude & Longitude:	North 37.930219, West -121.283669
Township & Range:	Lot 37, T1N, R6E, Mount Diablo Meridian

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

Project Description:

The Site property is located in the southwest corner of the intersection at South El Dorado Street and Delhi Avenue. The Site is currently occupied by a Mobil-branded active petroleum fueling facility. The Site facility consists of a station building and four dispenser islands under a canopy.

In October 1999, former Site owner Mr. Zeb Kahn removed three fuel USTs (one 12,000-gallon, one 10,000-gallon, and one 6,000-gallon), associated dispensers and piping, and 150 cubic yards of impacted soil from the Site. Mr. Kahn removed an additional 372 cubic yards of impacted soil from the UST area in May 2000.

Confirmation soil samples collected beneath the former USTs following removal contained up to 2,100 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as gasoline (TPHg), 1.8 mg/kg benzene, and 190 mg/kg methyl tert butyl ether (MTBE), indicating a release had occurred. Mr. Kahn filed an Unauthorized Release Report with San Joaquin County Environmental Health Department (SJCEHD) in November 1999. In March 2001, Advanced GeoEnvironmental Inc. (AGE) removed a waste oil tank of unknown volume from between the station building and the western property boundary. The soil sample collected beneath the UST pit contained 280 mg/kg TPH as diesel (TPHd), but no volatile organic compounds (VOC) above laboratory reporting limits.

Historically, various consultants have worked on this case on behalf of various Responsible Parties. In order to assess and cleanup the Site petroleum release, between 2004 and 2017 these various entities installed/advanced a total of 8 groundwater monitoring wells, 2 groundwater extraction wells, 4 soil vapor extraction (SVE) wells, and 19 soil and groundwater borings.

In August 2005, AGE performed an 8-hour soil vapor extraction (SVE) pilot test. Between April 2011 and October 2012, Stratus performed full-scale SVE remediation, removing a total of 155 pounds of hydrocarbons from beneath the Site. Stratus stopped remediation due to low mass recovery rates. Between October 2014 and February 2017, Stratus performed groundwater extraction and treatment remediation. However, this remedial effort was performed only periodically due to continuing tertiary butyl alcohol (TBA) concentrations in system effluent in excess of sanitary sewer discharge permit thresholds.

Stratus proposed the remediation course of action to address remaining hydrocarbons in Site soil, soil gas, and groundwater, while accounting for previous remediation difficulty encountered with TBA at the Site. Stratus proposes to implement the remediation in two phases: Phase 1 includes implementation of in-situ ozone injections; and Phase 2 includes implementation of groundwater extraction, ex-situ treatment, and re-injection of treated groundwater into upgradient re-injection wells. Phase 2 is to be implemented, in conjunction with Phase 1, only if Stratus and Central Valley Water Board staff determine that Phase 1 alone is not sufficient to remediate remaining petroleum hydrocarbons.

As detailed in the MRP, you will perform analytical testing on select monitoring wells in accordance with the enclosed MRP. You will assess the effectiveness of the remediation effort and ensure that breakdown products generated or mobilized from the injections do not exceed water quality objectives or groundwater limitations based on naturally occurring background water quality. As detailed in the attached MRP, you will implement a Contingency Plan if groundwater quality is degraded and concentrations of breakdown products (Phase 1) or hydrocarbons (Phase 2 only) in Compliance Zone wells exceed the Site-specific Action Levels established in the MRP due to ozone injections or re-injection of treated groundwater.

A public comment period was completed between 1 and 31 May 2021. During this time, Central Valley Water Board staff did not receive comments in relation to the proposed ozone injection or groundwater extraction/treatment/re-injection remediation at the Site.

General Information:

1. You will operate the project in accordance with the requirements contained in the *General Order*, the information submitted in the *NOI*, the Work Plans and Addendums, and as specified in this Notice of Applicability (NOA).
2. You shall submit the required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) until this NOA is officially rescinded.
3. You are prohibited from injection of materials other than those specified in the *NOI* into the subsurface unless analysis, as specified in the *General Order*, of the injectant is provided and concurred with by Central Valley Water Board staff.
4. Failure to abide by the conditions of the *General Order* in this NOA can result in enforcement actions as authorized by provisions of the California Water Code.
5. You shall comply with the attached MRP and any revisions thereto as ordered by the Executive Officer or directed by Central Valley Water Board staff.
6. Central Valley Water Board staff concurrence with the use of the proposed remedial technology within this NOA does not constitute an endorsement or requirement of its specific use. It is the explicit responsibility of the applicant/discharger to obtain all relevant legal rights of its use.

If you have any questions regarding this NOA, please contact Alan Buehler at (916) 464-4615 or by email at alan.buehler@waterboards.ca.gov.

Original Signed by John J. Baum, Assistant Executive Officer for
PATRICK PULUPA, Executive Officer

Enclosure: General Order and MRP

cc: Gowri Kowtha & Jennifer Pickett, Stratus Engineering Associates, Cameron Park (email)
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