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**REGULATORY/ MEDICAL HEALTH SERVICES
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November 10, 2016

Erling Rockwell
State Water Resources Control Board
P.O. Box 2231
Sacramento, CA 95812

Subject: Comment Letter – Chevron #9-1202, Proposed UST Case Closure

Re: Former Chevron Service Station 9-1202
9491 Edinger Avenue
Westminster, California 92027
OCHCA Case #94UT039

Dear Mr. Rockwell:

The Orange County Local Oversight Program (OCLOP) received the State Water Resources Control Board (SWRCB) Notice of Opportunity for Public Comment correspondence dated October 27, 2016, recommending case closure of the above referenced site. As the local agency overseeing corrective action, the OCLOP is writing to reiterate our objections regarding the proposed site closure. The OCLOP has the following objections to the closing of the Former Chevron Service Station 9-1202:

1. The OCLOP does not agree that the site meets the SWRCB Low Threat Closure Policy (LTCP) General Criteria assertion that a site conceptual model that assess the nature, extent, and mobility of the release has been developed. The OCLOP does not agree that the downgradient extent of the tert-butyl alcohol (TBA) plume has been defined in the area to the south and southwest of groundwater monitoring well MW-02.
2. The SWRCB states that “although contamination likely extends off-site into the street, the data does not support plume migration or a mobile source. There is no sensitive receptor to either the southeast or southwest.” Groundwater flow at the site has historically been reported to the southeast, and since January 28, 2013 to the southwest and south. In the last groundwater sampling event conducted August 2016, the groundwater flow was reported to the west. Based on the shift of the groundwater to the southwest-south-west, the OCLOP is concerned that the TBA contaminant plume has migrated off-site downgradient of well MW-02 which most recently showed TBA concentration of 3,000 µg/L and that the extent of the plume is not captured by the current monitoring well network and potentially extends under residential homes.

3. The SWRCB states that “TBA follows the classic MTBE degradation to TBA, which indicates contamination has been stable and degrading in place for 17 years. On August 5, 2016, MTBE concentrations were ND in all monitoring wells. On August 5, 2016, the maximum TBA indicated was 3,000 µg/L in monitoring well MW-02.” The OCLOP does not believe that TBA concentration in monitoring well MW-02 are stable. Concentrations of TBA in MW-02 increased from 2,000 µg/L (July 7, 2015) to 3,000 µg/L (August 4, 2016). Historically, TBA has consistently decreased in MW-02 and was reported as <2 µg/L in March 1, 2011 at which time MTBE was reported at <0.5 µg/L. Since that time, the concentration of TBA has been trending upwards while concentrations of MTBE have been reported as <1 µg/L since 2013.
4. The OCLOP does not agree that geoprobe borings GPB-11 through GPB-14 provide adequate delineation of current groundwater conditions. In 2003, concentrations of TBA in monitoring well MW-02 were reported at 22,000 µg/L (11/3/2003). Since that time, TBA has gradually decreased and was reported during the last annual sampling event (8/5/2016) at 3,000 µg/L. The observed decrease of TBA concentrations in the groundwater monitoring well MW-02 may be indicative of the TBA plume migrating offsite toward the residential area. In 2003 TBA contaminants may have not reached the location of the geoprobe borings.
5. During the annual groundwater monitoring sampling event (8/5/2016), monitoring wells MW-01, MW-02, MW-03, and MW-05 were all purged to dryness and therefore samples may not be representative of the formation.
6. The SWRCB’s Revised Review Summary Report from January 15, 2015 concurred with the OCLOP that the TBA plume was not assessed downgradient of groundwater monitoring MW-02 and that sampling southwest of groundwater monitoring well MW-02 should be conducted.

Given the issues described above, the OCLOP respectfully disagrees with the SWRCB’s recommendation that the site be closed. The OCLOP proposes that a work plan be prepared to assess the TBA plume south-southwest of groundwater monitoring well MW-02. In addition, additional groundwater sampling should be conducted with evaluation of the groundwater purge rate to ensure that wells are not purged to dryness prior to sampling.

If you have any questions, please contact me Julie Wozencraft at (714) 433-6252.

Sincerely,



Julie Wozencraft
Hazardous Materials Specialist
Hazardous Materials Mitigation Section
Environmental Health



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

cc: Tom Mbeke-Ekanem, Regional Water Quality Control Board—Santa Ana Region (electronic copy)
Eugene Francisco, Chevron EMC (electronic copy)
Judy Gilbert, GHD Services, Inc. (electronic copy)
Tim Nguyen, Property Owner, (electronic copy)