

**Response to Comments Received from Golden State Water Company,  
Regarding the Closure of CA Comfort Vans,  
Located at 8130 Electric Ave, Stanton, Claim 3562**

**Comment 1:** Based on data obtained from Orange County Water District, a downward vertical hydraulic gradient between the shallow unconfined aquifer and deeper drinking water aquifers exist in the area, which increase the threat to drinking water aquifers posed by contaminants at the Site.

**Response 1:** Drinking water is being pumped from depths of 300 plus feet deep in the area. The nearest public water supply well is 1,800 feet upgradient and operated by Golden State Water Company, (Well Clair 04). That distance is far farther than the required 1,000 foot separation as defined in the Low Threat Closure Policy (Policy).

**Comment 2:** Neither a summary evaluation of compliance with State Water Board policies and state law nor a summary of basic case information (Conceptual Site Model) was available for review as part of the June 2014 UST Case Closure Review Summary Report (RSR).

**Response 2:** All data reviewed to prepare the RSR was acquired from GeoTracker. The Conceptual Site Model (CSM) is defined in the Policy which provides that: "The supporting data and analysis used to develop the CSM are not required to be contained in a single report and may be contained in multiple reports submitted to the regulatory agency over a period of time".

**Comment 3:** The RSR states that the closure summary only addresses the 500-gallon petroleum UST that was removed in March 1990. However, it is unclear how the eight other USTs removed from the Site, and any associated contamination, are being addressed.

**Response 3:** Correct, the State Board is proposing to close only the case for the former petroleum hydrocarbon containing UST. The Orange County Environmental Health Department has the authority to open a Site Cleanup case for the other USTs and associated contaminants.

**Comment 4:** The RSR indicates the petroleum hydrocarbon concentrations at the Site are decreasing, but review of available data suggests that concentrations of benzene in groundwater at MW-7 have generally been increasing since 2005.

**Response 4:** The plume is stable as defined by the Policy, "A plume that is stable or decreasing is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration. The petroleum hydrocarbon plume at this Site meets the Policy criteria.

**Comment 5:** It is not clear whether all contaminants at the Site, such as acetone, tetrachlorethene, and trichlorethene, meet General Criterion b for Low-Threat UST Case Closure Policy sites (i.e. that the site contaminants consist of only petroleum, including petroleum solvents.)

**Response 5:** The proposed closure for this case relates only to the UST that contained petroleum hydrocarbons; Orange County Environmental Health Department has the authority to open a Site Cleanup case for the other USTs and associated contaminants.

**Comment 6:** The RSR indicates the petroleum hydrocarbon release is limited to shallow soil and groundwater, there are no monitoring wells screened below 36 feet bgs that could be used to preclude the presence of deeper groundwater contamination at the Site.

**Response 6:** The State Board does not see the need for deeper assessment for the following reasons:

- The petroleum hydrocarbon contaminants at the site have a specific gravity less than water,
- There is no mechanism to draw water downward present within 1,800 feet upgradient (Golden State Water Company well Clair 04) of the site, and
- The depths of the screened intervals in the nearest public water supply production wells is at 300 plus feet deep.

**Comment 7:** Because it is not clear whether the plume boundary has been unequivocally delineated, any groundwater contaminant plume at the Site is subject to significant interpretation; for example, the distance from the tank cavity formerly containing four USTs to downgradient monitoring well MW-7 is approximately 300 feet, which could be interpreted to mean groundwater contamination is associated with a Class 5 Site, as opposed to Class 2 Site, as indicated in the RSR.

**Response 7:** To meet the criterion for Class 2 the Policy states; “The contaminant plume that exceeds water quality objectives is less than 250 feet in length.” Downgradient well MW-6 was used to determine the plume extent (at approximately 120 feet from the UST excavation cavity).