

**Response to the Comments Received from Golden State Water Company,
dated August 25, 2014, Regarding the Closure of California Shipping,
Located at 8151 Electric, Stanton, Claim 3563**

Comment 1: It is not clear whether all contaminants at the Site, such as acetone, tetrachloroethylene, and trichloroethylene, 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 1: Acetone, tetrachloroethylene, and trichloroethylene were not stored in and released from the UST's therefore, these compounds are not addressed in this closure order. If the Orange County Environmental Health Department wants to open a Clean Up case to further pursue these compounds they can do so.

Comment 2: The May 21, 2014, Case Closure Review Summary Report (RSR) indicates that petroleum hydrocarbon concentrations are decreasing under natural attenuation, but it is not clear whether natural attenuation has been documented, such as through the measurement of natural attenuation parameters in groundwater.

Response 2: The Site has been an active Orange County Environmental Health Department UST case for 23 years and no active remediation has been directed nor proposed. However, the monitoring wells show a significant decline in petroleum hydrocarbon concentrations (as presented in the RSR) except for in the source area well MW-9 which fluctuates with groundwater elevation changes. The general decrease in petroleum hydrocarbon concentrations demonstrates that natural attenuation is occurring.

Comment 3: The RSR indicates that benzene concentrations in the source area well MW-9 are stable but, the graph presents an increasing trend in well MW-9.

Response 3: The plume is stable as defined by the Policy, "A plume is stable or decreasing when a contaminant mass has expanded to its maximum extent, the distance from the release where attenuation exceeds migration.

Comment 4: 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 4: 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 that of water,
- No mechanism to draw water downward is present, and
- The depths of the screened intervals in the nearest public water supply production well (1,800 feet upgradient) are at 300 feet and deeper.

Comment 5: 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 5: 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) because well MW-7 across the street is associated with a separate UST release case.