

**Objections to Closure and Responses for  
Shell Oil Station Located at 15501 Beach Blvd, Westminster  
Claim 4557**

February 3, 2015 a telephone conference call was postponed by the County to discuss their objections to closure if the State Water Board posted a response to their concerns. Their concerns are addressed as presented in their June 16, 2015 email.

Comments:

- Inadequate conceptual site model;
- the vertical and lateral extent is not defined, based on historical and variable groundwater flow (reported as west, northeast, northwest, south, southeast, southwest),
- groundwater contamination plume is not defined to the south and southwest of MW-1S. In addition, detected concentration of MTBE in CPT-18 (southwest of MW-1S) at 55 feet bgs indicates the vertical extent of the plume is not defined.

Response:

- Adequate data is available in GeoTracker to develop a conceptual site model as defined by the Policy.
- The existing monitoring well network, including MW-1S, defines the lateral extent of MTBE in groundwater.
- Additionally, the CPT-18 detection of MTBE at 55 feet bgs at a concentration of 3.8 µg/L, defines the vertical extent to below the secondary WQL.