



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH SERVICES  
ENVIRONMENTAL HEALTH**



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August 16, 2013

Vivian Gomez-Latino  
Office Technician  
State Water Resources Control Board  
1001 I Street, P.O. Box 2231  
Sacramento, CA 95812

**Subject: Comment Letter - Santiago Texaco UST Case Closure Summary**

**Re:** Texaco Station  
2640 Santiago Boulevard  
Orange, CA  
OCHCA Case #98UT083

Dear Ms. Gomez-Latino:

The Orange County Local Oversight Program (OCLOP) has reviewed the case file and the UST Case Closure Summary prepared by the State Water Resources Control Board (SWRCB) dated July 2013. The OCLOP would like to address/clarify following issues prior to consideration for site closure under the SWRCB low-threat closure policy (LTCP):

1. Case closure was denied by the OCLOP due to incomplete development of the site conceptual model. Soil delineation has not been completed in the vicinity of boring B-21 and vapor well VW-3 (located under the dispenser area).
2. Elevated vapor concentrations were detected in a few individual extraction wells prior to soil vapor extraction (SVE) remediation system shut-down in July 2005. In addition, results of rebound testing from August/September 2010 showed that vapor concentrations remained elevated in system influent and select individual extraction wells.
3. This site is located in the Forebay Area of the Orange County Groundwater Basin that is the primary source of drinking water for Orange County residents. Based on the incomplete assessment under the canopy, the highly permeable soils at the site, and the hydrogeologically sensitive nature of the area, it is OCLOP's position that the existing SVE system should be restarted with wells that showed elevated vapor concentrations during the 2010 rebound test and should continue to operate until vapor concentrations decline to asymptotic conditions.

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This Agency also provided a petition response letter dated July 22, 2011. Please refer to the OCHCA letter in Geotracker.

If you have any questions, please call me at (714) 433-6262.

Sincerely,



Shyamala K. Sundaram  
Hazardous Waste Specialist  
Hazardous Materials Mitigation Section  
Environmental Health

cc: Ken Williams, Santa Ana Regional Water Quality Control Board (electronic copy)  
Carl Bernhardt, Santa Ana Regional Water Quality Control Board (electronic copy)  
Ben Heningburg, SWRCB - UST Cleanup Unit III, Sacramento, CA (electronic copy)  
Nathan Jacobsen, SWRCB Staff Counsel (electronic copy)  
Deborah Pryor, Shell Oil Products US (electronic copy)  
John Huff, Wayne Perry, Inc. (electronic copy)  
Roy Herndon, Orange County Water District (electronic copy)  
David Bolin, Orange County Water District (electronic copy)  
Janette Pichay, City of Orange – Public Works Department, Water Division (electronic copy)