



June 8, 2012

VIA EMAIL to commentletters@waterboards.ca.gov

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Re: Comment Letter – June 19, 2012 Board Meeting, Farjami Mobil Case Closure Summary

Golden State Water Company (GSWC) has received and reviewed the State Water Resource Control Board's (SWRCB) "Notice of Opportunity for Public Comment – Underground Storage Tank Cleanup Fund (Fund), Case Closure Recommendation, Pursuant Health and Safety Code Section 25299.39.2: Claim Number 14412; Site Address: Farjami Mobil; 12493 Beach Boulevard, Station, CA, 90680" letter and "UST Case Closure Summary" dated May 10, 2012.

GSWC has the following comments:

- The UST Case Closure Summary incorrectly states "Water in the vicinity of the site is provided by the City of Station Public Works..." GSWC provides water in the vicinity of the site, not the City of Stanton Public Works.
- GSWC owns a total of five public water supply wells within a one-mile radius of the site.
- GSWC owns and operates a public water supply well located approximately 900 feet north of the site. The uppermost perforations of this well are approximately 200 feet below ground surface (approximately 145 feet below mean sea level).

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- Attachment 1 of the UST Case Closure Summary states “It is highly unlikely that any groundwater that may be impacted will be used as a source of drinking water”. However, a downward vertical groundwater gradient exists at the site and it is unclear if potential downward migration of petroleum hydrocarbons and fuel oxygenates has been adequately evaluated.
- Groundwater remedial efforts at the site were terminated in November 2011. Based on available information, additional remediation (groundwater extraction from monitoring well MW-13) was conducted in late 2011 and early 2012.
- Post-remediation groundwater monitoring is commonly conducted for one year after all active and passive remedial efforts are terminated. Post-remediation monitoring observes potential rebound of constituents of concern. It appears that the SWRCB proposes UST case closure without a reasonable period of post-remediation monitoring.

Should you have any questions, please contact me or Alex Chakmak at (714) 535-7711.

Sincerely,



Toby B. Moore, PhD
Water Resource Manager and Chief Hydrogeologist

cc: Robert Hanford, GSWC
Roy Herndon, Orange County Water District
Shyamala K. Sundaram, Orange County Health Care Agency