



Public Comment
Thrifty Oil #383 Case Closure Summary
Deadline: 11/5/12 by 12 noon

COUNTY OF ORANGE
HEALTH CARE AGENCY
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September 28, 2012

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



Subject: Comment Letter – Thrifty Oil #383 - UST Case Closure Summary

RE: Thrifty Oil Co. Station #383
18520 Brookhurst Street
Fountain Valley, CA
OCHCA Case #87UT050

Dear Ms. Townsend:

The Orange County Local Oversight Program (OCLOP) has reviewed the UST Case Closure Summary prepared by the State Water Resources Control Board (SWRCB) and signed by Ms. Lisa Babcock. The OCLOP would like to address/clarify several errors contained within the report that must be addressed prior to consideration for site closure:

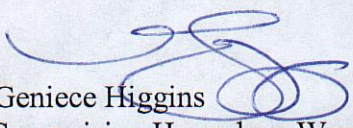
1. In the subject document Ms. Babcock indicates that only two wells are located within ½ mile of the site. This statement is incorrect. According to maps provided by the Orange County Water District well GKAW-FV2 (State Well No. 05S/10W/31H03) is located approximately 650 feet northwest of the site and is identified as a domestic supply well.
2. Further, the above referenced well is reportedly screened from 120-125 feet below ground surface and does not have a sanitary seal making the well a potential conduit for vertical contaminant migration and should be identified as a unique site attribute that increases the risk associated with residual site contamination which is in conflict with the “no” in checkbox associated with this field in the UST Case Closure Summary.

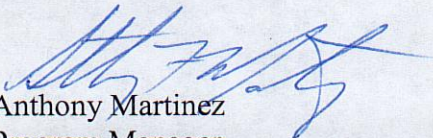
3. In the document Ms. Babcock also states that the plume length meets the Low Threat Closure Policy media specific criterion #1 for groundwater, indicating that the plume length that exceeds water quality objectives is less than 100 feet. At best the plume length can be measured at 165 feet (the distance from BW-1 to BW-3); however, this measurement likely underestimates the plume length, as the tertiary butyl alcohol (TBA) contaminant plume is not defined to the north or west of the site beyond 1,000 micrograms per liter ($\mu\text{g/L}$). The relevant water quality objective for TBA is 12 $\mu\text{g/L}$, the health-based Notification Level promulgated by the California Department of Public Health.

The OCLOP, respectfully requests that the SWRCB deny the recommendation for case closure because the site does not meet the standards of the Low Threat Closure Policy related to plume length, or potential risk of residual contamination impacting useable groundwater resources in this area.

If you have any questions, please call Geniece Higgins at (714) 433-6260.

Sincerely,


Geniece Higgins
Supervising Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health


Anthony Martinez
Program Manager
Hazardous Materials Mitigation Section
Environmental Health

cc: Valerie Jahn-Bull, Santa Ana Regional Water Quality Control Board (electronic copy)
Lisa Babcock, SWRCB (electronic copy)
David Bolin, Orange County Water District (electronic copy)