

State Water Resources Control Board

AUG 11 2016

Circle K Stores Inc.
Attention: Mr. Rex Abacan
255 East Rincon, Suite 100
Corona, CA 92879
(rabacan@circlek.com)

Dear Mr. Abacan:

**CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,
MOBIL #18-HCN, 1351 EAST DYER ROAD, SANTA ANA, ORANGE COUNTY**

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T0605900215
- Santa Ana Regional Water Quality Control Board (Santa Ana Water Board), Case No. 083000277T

State Water Board staff reviewed the closure request dated February 12, 2016, and the response from the Santa Ana Water Board dated April 18, 2016. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Santa Ana Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, State Water Board staff finds that the subject case does not meet the following Policy criterion:

- **General Criterion e.** → A conceptual site model that assesses the nature, extent, and mobility of the release has been developed.

Verification sampling identified a flat layer of tertiary butyl alcohol (TBA) across the subject site which has not been delineated. The planned one-day groundwater extraction event is expected to provide the data necessary to determine the extent of the TBA plume beneath the subject site.

Contaminants remaining at the subject site continue to pose a potential threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact Mr. George Lockwood at (916) 341-5752 or George.Lockwood@waterboards.ca.gov.

Sincerely,



Karen Larsen, Deputy Director
Division of Water Quality

cc:

Mr. Kurt Berchtold, Executive Officer
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