



# California Regional Water Quality Control Board

## San Diego Region



**Terry Tamminen**  
Secretary for  
Environmental  
Protection

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<http://www.swrcb.ca.gov/rwqcb9>

**Arnold Schwarzenegger**  
Governor

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For a list of simple ways you can reduce demand and cut your energy costs, visit our website.*

June 17, 2004

**CERTIFIED MAIL**  
**7099 3400 0015 9997 0682**

Mr. Chris Panaitescu  
Thrifty Oil Company  
P.O. Box 2128  
Santa Fe Springs, CA 90670

In Reply Refer to:  
**TSMC:50-586.05:peass**

Dear Mr. Panaitescu:

**RE: ADDENDUM NO. 1 TO CLEANUP AND ABATEMENT ORDER NO. 91-47  
Thrifty Oil Company, Station 112, 1484 East Washington Ave., El Cajon, CA**

On May 29, 1991, the Regional Water Quality Control Board, San Diego Region (RWQCB) issued Cleanup and Abatement Order (CAO) No. 91-47, which directed Thrifty Oil Company to assess the extent of petroleum contamination, implement remedial action, and submit quarterly progress reports. Since 1991, additional specific information must be submitted in the progress reports to assist RWQCB staff with interpretation of the ground water plume.

A comprehensive ground water monitoring program and regular monitoring reports are needed to assess the extent of contamination and the effectiveness of cleanup actions at the site. Without these reports, the Regional Board cannot verify the completion of corrective action. Therefore, the costs of preparing the reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.

Directive 5 of CAO No. 91-47 requires the discharger to conduct ground water monitoring and submit reports quarterly. The directive, however, does not require that the reports contain important elements such as time versus concentration graphs or isoconcentration maps of constituents of concern, updates to the Site Conceptual Model, and other elements of a complete monitoring report. The directive does not require the submission of electronic monitoring data into GeoTracker, nor does it require that the reports be submitted under cover of a transmittal letter signed by the discharger.

**Therefore, Directive 5 of CAO No. 91-47 is rescinded and replaced with the following:**

- 5. GROUNDWATER MONITORING:** The discharger shall measure groundwater elevations quarterly in all monitoring wells, and shall collect and analyze samples of groundwater from all monitoring wells using U.S. Environmental Protection Agency (EPA) analytical method 8015

***California Environmental Protection Agency***

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for quantifying total petroleum hydrocarbons as gasoline and diesel, or an equivalent method approved by the Regional Board, and EPA method 8260b for volatile organic compounds including benzene, toluene, ethylbenzene, xylenes, methyl tertiary butyl ether (MTBE), tertiary butyl alcohol (TBA) and all other fuel oxygenates.

The discharger shall sample any new monitoring or extraction wells quarterly and analyze groundwater samples for the same constituents as shown above. The discharger may propose changes in the above sampling requirements; any proposed changes are subject to Regional Board approval.

The discharger shall submit quarterly groundwater monitoring reports to the Regional Board no later than 30 days following the end of the quarter according to the following schedule:

First Quarter (Jan-Mar)	Due no later than April 30
Second Quarter (Apr-Jun)	Due no later than July 30
Third Quarter (Jul-Sep)	Due no later than October 30
Fourth Quarter (Oct-Dec)	Due no later than January 30

This schedule shall commence with the submission of a quarterly monitoring report due on July 30, 2004.

The quarterly monitoring reports shall include:

- A. **Transmittal Letter:** The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the discharger's principal executive officer or his/her duly authorized representative, and shall include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.
- B. **Groundwater Elevations:** Groundwater elevation data shall be presented in tabular form, with depth to groundwater, top of casing elevations, depths to the top of well screens, length of well screens and total depth for each well included in the monitoring program. For all wells containing floating free petroleum product (light non-aqueous phase liquids or LNAPL) include the measured thickness of LNAPL in a tabular form. A groundwater elevation map should be prepared for each monitored water-bearing zone with the groundwater flow direction and calculated hydrologic gradients(s) clearly indicated in the figures(s). Historical groundwater elevations shall be included in the fourth quarterly report each year.

**C. Reporting Groundwater Results:**

1. Groundwater sampling data shall be presented in tabular form, and an isoconcentration map shall be prepared for constituents of concern for each monitored water-bearing zone, as appropriate. Time versus concentration plots and distance versus concentration plots that include groundwater elevation shall be prepared for constituents of concern for appropriate wells. Constituents of concern are any component of petroleum that is detected as a result of the release from this gas station.
2. Provide a site plot plan which clearly illustrates the locations of monitoring wells, former/current underground storage tank systems (and product piping) and buildings located on site and immediately adjacent to the property lines of the site.
3. Provide a site plot plan with the most recent concentrations of total petroleum hydrocarbons and volatile aromatic hydrocarbons (e.g. benzene, toluene, ethylbenzene, total xylenes, MTBE, TBA and other fuel oxygenates).
4. The report shall provide technical interpretations of the groundwater data, and describe any significant increases in contaminant concentrations since the last report, any measures proposed to address the increases, any changes to the Site Conceptual Model, and conclusions and recommendations for future action with each report.
5. The report shall describe analytical methods used, detection limits obtained for each reported constituent, and a summary of QA/QC data (including laboratory flags/comments).
6. The report shall indicate sample collection protocol, describe how investigation derived wastes are managed at the site, and include documentation of proper disposal of contaminated well purge water and/or soil cuttings removed from the site.
7. Historical groundwater sampling results shall be provided in tabular form and included in the fourth quarterly report each year.
8. Sampling data and groundwater elevation data shall be submitted via the internet to the GeoTracker data warehouse in the appropriate electronic format according to the schedule in item 3 above. The GeoTracker website address is <http://geotracker.swrcb.ca.gov>.

- D. Status Report:** The quarterly report shall describe relevant work completed during the reporting period (e.g. site investigation, interim remedial measures, results of implementation of the Corrective Action Plan) and work planned for the following quarter.

You may contest the issuance of this CAO Addendum by requesting a public hearing on the matter before the Regional Board. In order to schedule a hearing this office must receive a written request no later than 5 PM on July 19, 2004 (30days). Be aware that a request for a hearing does not stay deadlines in the CAO.

Mr. Panaitescu  
Addendum #1 to Order No.91-47

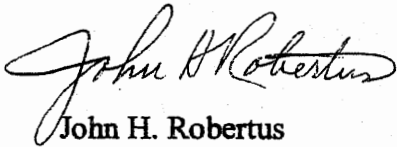
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June 17, 2004

The heading portion of this letter includes a RWQCB code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the RWQCB pertaining to this matter.

If you have any questions, or require additional assistance, please contact Ms. Sue Pease of my staff at (858) 637-5596 or by email at [peass@rb9.swrcb.ca.gov](mailto:peass@rb9.swrcb.ca.gov).

Sincerely,



John H. Robertus  
Executive Officer  
San Diego Regional Water Quality Control Board

JHR:jac:sjp

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