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## Central Valley Regional Water Quality Control Board

24 April 2026

Al Zghoul Family Trust  
c/o Moe Hamdi, COO Synergy Petroleum Inc.  
510 Myrtle Ave #209  
South San Francisco, CA 94080

**NOTICE OF TERMINATION OF ORDER NO. R5-2015-0012-080  
QUICK-N-SAVE #2, 2057 S. EL DORADO STREET, STOCKTON, SAN JOAQUIN  
COUNTY, LUST CASE# 391086, GLOBAL ID #T0607700901**

On 2 June 2017 Central Valley Water Board staff (Staff) issued a *Notice of Applicability (NOA)* under General Order R5-2015-0012, *Waste Discharge Requirements General Order for In-situ Groundwater Remediation and Discharge of Treated Groundwater to Land*. The NOA allowed for two phases of remediation at the Quick-N-Save #2 property at 2057 S. El Dorado Street in Stockton (Site). Phase 1 remediation consisted of ozone injection. Phase 2 was included as a contingency in the event Phase 1 alone was ineffective, and it consisted of groundwater extraction, ex-situ treatment, and re-injection. In the NOA, Central Valley Water Board staff assigned the project Order No. R5-2015-0012-080. In a 10 August 2023 directive letter, Staff established Action Levels for remediation parameter concentrations in groundwater.

Stratus Engineering Associates LLC (Stratus) implemented only Phase 1 remediation, because Site conditions did not warrant the implementation of Phase 2. Between August 2023 and March 2025, Stratus injected ozone for a total of 8,611 hours, with an average flow rate of 10 standard cubic feet per minute (scfm). Upon review of remediation-related sampling performed under the NOA, Central Valley Water Board staff determined that you complied with the requirements of the associated *Monitoring and Reporting Program (MRP)*. You collected samples from a total of 13 background, treatment, transition, and compliance zones wells monthly for three months then quarterly thereafter, and you analyzed collected samples for Suite A and Suite B parameters per the MRP.

In their 14 March 2026 *Closure Evaluation Report*, Stratus concludes that you did not degrade water quality. Total chromium concentrations were above established Action Levels observed in compliance zone wells during three separate sampling events, including the most recent event in December 2025. Stratus concludes that these concentrations were not a result of ozone remediation at the Site. Staff concurs. If the increases in total chromium concentrations were a result of the ozone remediation,

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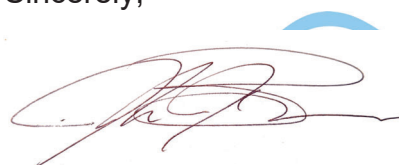
NICHOLAS AVDIS, CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

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similar increases would have been observed in treatment zone wells. Total chromium concentrations in treatment zone wells did not exceed the Action Level. Additionally, total chromium concentrations did not exceed the San Francisco Bay Water Board's Environmental Screening Levels in remediation monitoring wells. Therefore, the *NOA* for **Order No. R5-2015-0012-080 is hereby terminated** as of the date of this letter, and Staff will modify invoicing accordingly.

If you have any questions or concerns regarding comments in this letter, please contact Alan M. Buehler at (916) 464-4615 or by email at [alan.buehler@waterboards.ca.gov](mailto:alan.buehler@waterboards.ca.gov).

Sincerely,



Digitally signed by John

J. Baum

Date: 2026.04.24 11:26:54

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water Boards

for PATRICK PULUPA  
Executive Officer

cc: Gowri Kowtha & Jennifer Pickett, Stratus Engineering Associates Inc. (email)  
CIWQS Program Support Staff (email)