



G&M Oil Company, Inc.
G&M Oil Co., LLC

March 14, 2012



State Water Resources Control Board Members:

Chair, Charlie Hoppin
Vice Chair, Frances Spivy-Weber
Board Member, Tam Doduc

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Via E-mail c/o Jeanie Townsend, Clerk of the Board (commentletters@waterboards.ca.gov)

Subject: **Strong Support** for the Proposed Low-Threat UST Closure Policy

Honorable Water Board Members:

G&M Oil Company is submitting this letter in strong support for the adoption of the Low-Threat UST Closure Policy.

G&M Oil Company was started in 1969 by George A. Pearson with one station in Seal Beach. With Mr. Pearson at the lead, G&M has grown into a family operated company with 170 stations throughout Southern California, employing more than 900 people. Our company strives to provide clean, well-maintained service stations and offer competitively priced products to the communities we serve.

With the advent of the UST Cleanup Fund, many of G&M sites were incorporated in the established program. The UST Cleanup Fund has been utilized by G&M Oil Company to aid in the cleanup many properties. G&M also has sites that are not part of the UST Cleanup Fund, and are remediated with out of pocket funds.

Over the years, there has been an inconsistent approach when it comes to site closure criterion with the regulatory community. The adoption of the Low-Threat UST Closure Policy would provide a valuable tool for expediting sites out of the cleanup program and freeing resources for those that really need them or that could be reinvested into growing our business. A few examples are provided below with regard to the urgent need for adopting this Closure Policy.

G&M Oil Company Station #14, Westminster: An environmental release was documented at this station in September 1995. By mid 2006, remedial efforts had been completed and the consultant on the project requested closure of the environmental case file due to a stable

March 15, 2012

pg. 2

plume condition and best available technology being utilized to remediate the hydrocarbons. From June 2006 until June 2010, only groundwater monitoring continued and the site remained an open case. In August 2010, the existing site wells were finally abandoned and the site case file considered closed. Had G&M Oil Company had access to the Low-Threat Closure Policy, a significant amount of resources could have been redirected to sites that were in greater need.

G&M Oil Company Station #02, Seal Beach: An environmental release was documented at this station in September 1998. Following investigation by boring and well installation, remedial efforts initially consisted of completing dual phase extraction (DPE) events in 2001 and again in 2002. In August 2005, remediation of the soil source area was accomplished using soil excavation and off-site disposal/treatment. Following the remedial efforts, additional wells were installed and monitoring continued. Generally, with the exception of an active gas survey in 2010, groundwater monitoring has been the only environmental activity at the site. Again, if a policy was in place to for Low-Threat Closure, resources could be directed to other sites and this site could be removed from the case load.

G&M Oil Company Station #58, Pico Rivera: An environmental release was documented at this station in October 1998. Investigation of the hydrocarbon impacts on both soil and groundwater beneath the site were accomplished and a remediation system was installed and operational from December 2006 to July 2008. The remediation system was shut down as the hydrocarbon source was reduced to levels that were no longer economically feasible to remove. While minor concentrations remained in the groundwater, there was very little change based on the quarterly monitoring events conducted. The concentrations either remained low or reduced to non-detectable. Nevertheless, continued monitoring was conducted and closure has not yet been obtained. This site should have no further environmental expenditures but with the lack of a Low-Threat Closure policy, the unnecessary spending continues.

G&M Oil Company Station #32, Westminster: This has been an open case for more than 25 years. Remedial efforts at the site were completed in 2006. The site has more than 20 years of groundwater monitoring data. In August 2010, G&M requested closure of the site. In January 2011, the Orange County Health Care Agency began a "file review" to close the site. In March 2011, The Cleanup Fund staff recommended low risk closure of the site in their 5 Year Case Review. To date, a closure letter has not been issued. With a Low-Threat Closure policy, the regulating agency could have closed this site after confirmation monitoring had been completed.

Other G&M properties: G&M currently operates 37 stations that are in various stages of remedial action by other parties, former owners or operators, or major oil companies. Closure of these any of these sites with a Low-Threat Closure policy would benefit our business by allowing easier insuring and financing or the freedom to develop with properties without the concern of an open case.

March 15, 2012

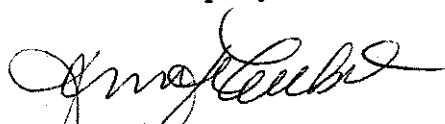
pg. 3

The above cases are just a sampling of the total number of G&M Oil Company stations that have potential to be expedited to closure status resulting in significant case load reduction, the freeing up of needed resources for other sites and allowing G&M Oil Company to focus on its business and community. G&M Oil Company agrees with the other operators, consultants and regulators in the industry and would request that this Low-Threat Policy be approved since:

- The absence of a clearly-stated policy on low risk has created a significant backlog of sites that need no further action, but continue to drain limited remediation revenues. The Policy will help clear that backlog.
- The Policy represents a method where the most up-to-date science and knowledge about petroleum site risks can be evaluated, judging each site on its own particular characteristics.
- The policy recognizes that very little impact has occurred from petroleum contamination, and that resources should be applied to locations in most need of assistance.
- The policy allows oversight agencies to keep sites open if they pose a demonstrable risk.
- The policy takes into account all possible pathways to exposure.
- It is a central cog in the modernization of both the State UST Cleanup and UST Fund program - without its adoption, these important programs risk elimination.

G&M Oil Company asks that the Board adopt the proposed policy as submitted for public comment (January 31, 2012 version) as quickly as possible. Consistent and practical policies are what California needs to continue the preservation of our environmental programs.

Sincerely,
G&M Oil Company, Inc.



Jennifer Talbert
Vice President

cc: CIOMA