

# REDDING OIL COMPANY

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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

Subject: Request for approval – proposed low-threat UST Closure Policy.

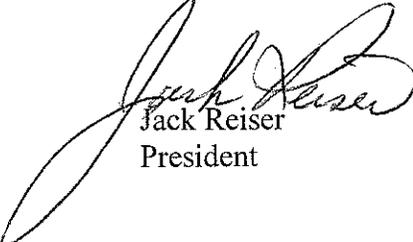
Dear Members:

Our company is a small petroleum jobbership which has served the Shasta, Trinity, Tehama, and Butte counties for over seventy years. Over those years we have purchased properties which were marketing petroleum products, three of which later were found to have underground contamination which required remediation. With the assistance of the Underground Spill Fund we were able to close two of them. We still are in the process of closing the third site, which is not covered by the Fund due to a leak involving underground piping from an above ground storage tank. The latter has been a tremendous drain on our profitability, but after aggressively acting to clean the property, we should be finished in two more years.

If it were not for the Fund, we quite possibly would not have survived to write this letter, though over the years we have paid and continue to pay gallonage fees back into the Fund for up to nine facilities having underground petroleum storage tanks.

Due to our experience with two contaminated site closures, we strongly recommend the proposed low-threat UST Closure Policy be adopted so science can be used to show that sites which are stabilized and pose no additional risk to the environment can be allowed to degrade over time with existing soil organisms.

Regards,



Jack Reiser  
President