

May 3, 2004

Dr. Keith Roberson, Associate Engineering Geologist
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

SUBJECT: Comments on Tentative Order – Revision to Final Site Cleanup Requirements for United Technologies Corporation, Pratt & Whitney Space Propulsion

The Santa Clara Valley Water District appreciates the opportunity to provide comments on the Tentative Order for the UTC Metcalf Road facility. We find that the document overall, and particularly the ordered Prohibitions and Tasks, will bring about a substantial improvement to environmental controls preventing downstream contamination from this facility. While all sites contaminating the waters of the State must be addressed, cleanup at this site is especially important as it is located immediately upstream of Anderson Reservoir, a vital component of the District's drinking water supply infrastructure. Preventing contamination is dependent upon the full cooperation and compliance by the named responsible party. Pratt and Whitney have demonstrated a willingness to take proactive measures to mitigate contamination problems and fully comply with regulatory orders. We look forward to their continued cooperation with RWQCB in fulfilling the revised Site Cleanup Requirements.

The Tentative Order brings about notable improvement in the area of surface water monitoring in both creeks and storm water runoff. The requirement that contaminant discharge to creeks must be eliminated will lead to significant improvements toward protecting the watershed from residual contamination from past industrial activities at this facility. To continue the trend of progress in surface water controls, we recommend that RWQCB and the Santa Clara Valley Water District be routinely copied on all storm water monitoring activities at this facility.

The Order requires several new initiatives to ensure that soil and groundwater contamination from perchlorate are fully addressed. These requirements are the logical next step following a series of investigations conducted under RWQCB's oversight in the past several years, and will lead to the eventual but permanent eradication of threats to water quality from perchlorate.

The Order establishes a cleanup level of 6 µg/L for perchlorate in on-site groundwater. In general, we are philosophically inclined to favor a cleanup level set to background. At this site, however, given the very high concentrations in some locations on the site and the substantial cleanup effort required to reduce concentrations to 6 µg/L, and considering the additional requirements prohibiting off-site discharge of perchlorate in creeks and groundwater, we accept RWQCB's preferred cleanup level of 6 µg/L.

The Order introduces new monitoring requirements to provide meaningful surface water data from which mass discharge estimates can be derived. Together with the requirement for baseline hydrologic studies to develop a dynamic surface water monitoring program, this Order

represents a significant shift toward process-based monitoring. We look forward to viewing site data in a new light as a result of these improvements.

The Santa Clara Valley Water District appreciates the substantial effort invested by RWQCB staff to insure that meaningful progress toward cleanup continues at this site. RWQCB's consideration of stakeholder interests, and the collaborative approach taken by RWQCB with Pratt & Whitney and the District, has led to an unprecedented level of cooperation and progress.

Sincerely,

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Solvents and Toxics Cleanup Liaison
Groundwater Cleanup Oversight Programs Unit

cc: Timothy Marker, Pratt & Whitney Space Propulsion
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Frances Brewster, Jim Crowley, Bruce Cabral, Santa Clara Valley Water District