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**Hookston Station Cleanup Plan
Comment Form
August 10, 2006**

If you would like write comments to submit tonight on the proposed Cleanup Plan, please use this sheet. Before approving the Cleanup Plan, Water Board staff will consider and respond to all verbal comments received tonight and written comments postmarked no later than September 1, 2006.

See attached comment -

*Jane L. Wolff
for Welch family*

CALIFORNIA REGIONAL WATER
SEP 07 2006
QUALITY CONTROL BOARD

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From: Janet L. Wolff

Date: 8/31/06

Hookston Station Cleanup Plan
Comments attached to

Comment Form dated August 10, 2006

Comments from: Janet L. Wolff, on behalf of self and as trustee of the Welch Family Trust.
Residence: 1260 Trafalgar Court Concord, California 94518

} making address

These comments also represent family members: Frances D. Welch, Elaine A. Welch, Richard J. Welch, Charles M. Welch, Jr., and Charles M. Welch, Sr. (deceased)

The Cleanup Plan presented by the Calif. Regional Water Quality Control Board is not agreed to as the final resolution or even short term clean-up remedy to return the property to a condition that provides acceptable health, safety, usability and property value for the following reasons:

- The remedial action proposed in the Feasibility Study only addresses the Hookston Station site and does not address the effects, impacts or other conditions that may be occurring from adjacent identified plumes; e.g., from the Cull property site, or Pitcock Petroleum site. There is not assurance that this treatment may, if done in an isolated manner as proposed, exacerbate the effects of the other plumes. This assurance must be made as well, and assurance that action to resolve these other sites must also be taken.
- The proposal to install a permeable reactive barrier with treatments that would only treat the TCE plume that presently resides under that barrier, and then relying only on the slow process of natural attenuation, does not address the downgradient (northeast) existence of the plume. More aggressive and direct treatment of this area, rather than reliance on a lengthy period of natural attenuation needs to be implemented.
- The February 2006 C.T.E.H. Toxicology Report for the Baseline Risk Assessment, pages 39 and 40, states that there exists a cancer risk exposure for the Colony Park neighborhood and therefore 'needs further study'. The remedial action proposed by the Feasibility Study is not based on this 'further study' and therefore cannot be deemed acceptable as an acceptable specification for the proposed clean-up plan. Simply stated: the proposed Clean-up Plan is based on incomplete information.
- The proposed Clean-up Plan provides for the injection of chemical oxidants into the ground and the health and safety effects of these chemicals, proximity to underground pipes, utilities, Kindermorgan high-pressure pipeline, PG&E distribution center, etc. have not been addressed.
- Finally it has not been sufficiently explained as to why the clean-up site for the Hookston Station site needs to be in Len Hester Park rather than the site of the source of the toxic contamination?

Sincerely, Janet L. Wolff

Janet L. Wolff
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