

**Response to Comments Received for Claim 17716
from Sacramento County LOP**

Comment 1. The extent of the Plume has never been defined;

The four wells that SWRCB staff used to determine the extent of the contamination at the site are located almost in a straight line cross-gradient to the predominant groundwater flow direction (south south-west). This flow direction calculation is based on the groundwater elevations from an adjacent site where a sufficient number of wells are installed at locations far enough apart that the inherent inaccuracy of flow direction calculations is minimized. Experience has shown that using four wells that are generally in a straight line, with only approximately 20 feet offset, to define a flow direction can be highly inaccurate.

At times, based on calculations from the adjacent site, the flow direction is to the south south-east. This flow direction is also cross gradient to the wells located at 6700 Folsom Boulevard. Please see Attachment A and Attachment B, respectively, for the alignment of the wells and the rose diagram showing flow directions. Attachment C shows the concentrations found in the wells during the last sampling round (2010).

In our opinion that it is not scientifically realistic to conclude that this Site has been adequately defined. Note that we are not including MW-16 (which is also generally in a straight line with the other four wells) as a relevant monitoring well – the source of the contamination in this well may not be related to the tanks that existed on the Site.

RESPONSE: Using the wells that are present (Site wells and adjacent site wells) and the *Technical Justification for Groundwater Media-Specific Criteria, 2012*, the plume boundary can be projected. The Technical Justification was used in the development of the Low Threat Closure Policy and presents a peer-reviewed study of plume lengths for TPH-g plumes in California (Shih, 2004). Using the TPH-g plume length at the 90th percentile, the plume length is projected to be 413 feet long. Looking at the receptors that overlie that projected plume there are Q Street, two rail lines (UP and Light Rail), two above ground power lines, a 36" sewer main, a Kinder Morgan high pressure petroleum transmission pipeline with a vacant paved parcel adjacent to the Hwy 50 right-of-way.

Comment 2. The potential for indoor air has not been evaluated; and

RESPONSE: The case meets Policy Criterion 2b. A professional assessment of site-specific risk from exposure through the vapor intrusion pathway shows that maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. Soil data were not available for review, but remaining concentrations in the near-surface after 26 years are not anticipated to be significant. The former source area is outside the existing building in a driveway and loading dock area. The building is a warehouse-style building currently utilized by Red Dog Shred as a document shredding service and drop-off location. The building interior is accessed through a set of glass doors on the west side of the building for

public access and a metal door and a roll-up door on the south side of the building in the loading dock area. Ventilation in such a building is usually considerable both to maintain air conditioning/heating as well as to provide ventilation for forklifts and similar equipment used in warehouse operations.

Comment 3. No sensitive receptor survey, notably the existence of either municipal or domestic supply wells, of the area has been conducted.

RESPONSE: This assessment is not necessary. Looking at the receptors that overlie that projected plume there are Q Street, two rail lines (UP and Light Rail), two above ground power lines, a 36" sewer main, a Kinder Morgan high pressure petroleum transmission pipeline with a vacant paved parcel adjacent to the Hwy 50 right-of-way.