



To: Jeanine Townsend, Clerk to the Board

Re: **March 15, 2011, Board Meeting, UST Case Closure**
3999 Douglas Blvd., Roseville, CA
USTCF Claim No. 4967

I disagree with the recommendation for case closure, at least based on the Case Closure Summary (CCS) and the rationale given.

- 1) When the CCS mentions that there are no "DPH water supply wells" within a ½ mi. does that include any private wells that could be there?
- 2) Under the Remediation Summary the CCS states that "1.09 pounds of TPHg... and 11.8 pounds of MTBE" were removed by one of the remedial methods. Since MTBE is a component of gasoline, and as expected the concentrations listed are much higher for TPHg than MTBE the numbers and/or compounds seem wrong. What else may be wrong?
- 3) The statement on page 8 of the CCS "According to calculations, based on groundwater data from MW-1, WQOs for all petroleum constituents will likely be achieved within 80 years". No calculations are provided and this does not match the data graphs shown on page 6. Maybe you are trying to omit concern for TPHg when you say "constituents" and only refer to benzene. Fluctuations in concentrations of TPHg vary about 500% over the last several years, and over all show an upward trend. This goes against your obviously misleading statement made on page 11 where it says "...TPHg concentrations on (sic) MW-1 are not suggesting an increasing trend. The data indicates the trend is relatively stable with minor fluctuations due to seasonal changes in the in the (sic) water level elevation." 500% fluctuations are not relatively stable. Also, no water level elevations are plotted. Can more treatment be done around MW-1?

Also, the plot for TPHg concentration from well MW-23 show a clearly upward trend except for the last data point. One data point does not make a trend!

Also, trends are supposed to be an indicator of natural attenuation. Therefore, only the time period after all remediation stopped should be used.
- 4) For Sensitive Receptor Survey you only mention supply wells and surface water bodies. Sensitive receptors should also include residences, schools, day care, hospitals or elder care facilities, basements, and perhaps utility corridors.
- 5) Several times the CCS mentions there is no anticipated future beneficial use of this water. What is that statement based on? Could the shallow water be used for landscaping?
- 6) The CCS states that there will be no adverse effect on the deeper aquifers due to unspecified hydrogeologic and other characteristics. All aquitards leak and deep impacts take place. As an example look at the San Gabriel Valley where many deeper wells were impacted by MTBE.