



To: Jeanine Townsend, Clerk to the Board

Re: **March 15, 2011, Board Meeting, UST Case Closure**
5851 Fair Oaks Blvd., Carmichael, CA
USTCF Claim No. 7199

Concern over rationale provided for case closure based on the Case Closure Summary (CCS).

On pg. 3 it states that there are nine years of groundwater data for the site, then presents a graph from a well having a 60 foot long screen, which shows 6 sample points for benzene over the last 13 years. It looks like data was only collected from 1998, 1999, and 2006. What about TPHg data?

On page 6 it states "There is little residual petroleum hydrocarbon in soil at the Site." According to the data presented on pg. 2 there is no basis for that statement. The summary data indicates that only TPHg was analyzed- with high concentrations. Apparently there is no subsequent data! Maybe that is why the SCEMD wants additional soil data.

This same paragraph also says that it is highly unlikely that the groundwater will be used in the foreseeable future – based on what/whom?

The final paragraph states that standard construction practices and requirements would prevent impacts from the contaminated area. How? Even for community supply wells only the top 50 feet are required to be sealed. At this site the monitoring wells are up to 75 feet deep and the static water level in 2008 is reported at ~61 to 75 feet deep. This rationale does not pertain to the site and should not be used.

The apparently false statements need to be removed/revised.