RESPONSE: August 15, 2013, Alameda County Water District Comment Letter

Comments and Responses:

1. This Site does not meet the Policy's General Criteria (e): there is no conceptual site model.
   RESPONSE: As specified by the Policy, the supporting data and analysis used to develop the conceptual site model are not required to be contained in a single report and may be contained in multiple reports submitted to the regulatory agency over a period of time. Adequate data is available in GeoTracker to construct a conceptual site model consistent with Policy criteria. Adequate data assembled from GeoTracker have been presented in the Review Summary Report for this case.
2. This Site does not meet the Policy's General Criteria (f): Secondary source remains.
   RESPONSE: Residual hydrocarbons from the former gasoline underground storage tank were removed either by excavation, groundwater extraction, or by enhanced or natural attenuation conducted at this Site. This fact is supported by years of analytical groundwater data that show the groundwater plume is decreasing in aerial extent and concentration.
3. This Site does not meet the Policy's Media-Specific Criteria for Groundwater because the contaminant plume that exceeds water quality objectives must be stable and or decreasing in aerial extent.
   RESPONSE: The extent of the groundwater plume in defined by monitoring wells on the northeast by W-2, the west southwest by P-3, and the south by P-11. The plume is approximately 40 feet in length and has been decreasing in aerial extent since at least 2003. Specifically, the case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary. In addition, only concentrations of benzene exceed water quality objectives. Residual benzene concentrations remain in source area wells W-1, W-3, and W-4 at concentrations 87, 33 and 210 µg/L, respectively, all below historic highs, and fluctuating in response to seasonal groundwater levels.