

**RESPONSE TO ALAMEDA COUNTY LOP COMMENTS DATED 8/7/2013**  
**CLAIM 3000, CALIFORNIA LINEN**

1. COMMENT: Soil at the site contains elevated arsenic and lead concentrations, related to fill material, rather than a UST release.  
RESPONSE: The State Board is only closing the petroleum hydrocarbon UST related portion of the Site. The County can open a separate case for the lead and arsenic cleanup as necessary.
2. COMMENT: A review of the case files indicates that the site had a former maintenance shop, and therefore, solvents are a potential chemical of concern.  
RESPONSE: The State Board is only closing the petroleum hydrocarbon UST related portion of the Site. The County can open a separate case for the solvents cleanup as necessary.
3. COMMENT: It appears that utility conduits in Linden Street may act as preferential pathways for shallow LNAPL downgradient of bores B5 and B6.  
RESPONSE: Borehole logs for boreholes B-5a, B5-b and B-6 do not identify LNAPL.
4. COMMENT: The CSM has not been updated in over 5 years and an appreciable amount of data has been collected in that time period, and is highly scattered in site documents.  
RESPONSE: As defined in the Policy "*The supporting data and analysis used to develop the CSM 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.*"
5. COMMENT: The case fails the nuisance criteria because offsite soil bores and soil vapor wells have been installed adjacent to downgradient residential homes, including low-income units. This is presumed to be in the depth interval of a full basement, and may be a groundwater infiltration or vapor intrusion hazard. These basements cannot be evaluated against the May 2013 revised RWQCB ESLs for soil vapor as the document assumes a separation distance between interior air and groundwater. It appears appropriate to resample the vapor wells.  
RESPONSE: This case does not fail the nuisance criteria as defined in the Policy because soil vapor does not meet the definition of nuisance. Vapor in the policy is handled in the Vapor Intrusion Media Specific Criteria. The residences do not overlie petroleum hydrocarbon contaminated groundwater these residences are crossgradient, and soil vapor concentrations measured in June 2012 do not exceed the Policy criteria. The San Francisco Bay RWQCB ESL's are screening tables not regulatory cleanup standards.
6. COMMENT: The Case Closure Review Summary Report indicates that the USTCF has determined the site meets Category 1 of the Groundwater Media-Specific Criteria. This category requires that the groundwater plume is less than 100 feet in length, there is no free product, and that the nearest water supply well and surface water body is over 250 feet in distance. As noted above, soil and groundwater contamination at soil bore B90 (770 mg/kg TPHg, 4.4 mg/kg ethylbenzene, and 13 mg/kg total xylenes in soil; and 30,000 µg/l TPHg, 420 µg/l ethylbenzene, and 2,200 µg/l total xylenes in groundwater) located between approximately 180 to 230 feet downgradient from one of the three onsite source areas, documents that the downgradient extent of the soil or groundwater plume has not been defined.

RESPONSE: The length of the plume defined by constituents having water quality objectives is less than 100 feet.

7. COMMENT: The case fails the Media Specific Criteria for Vapor Intrusion to Indoor Air.  
RESPONSE: The case meets the Policy criteria. A soil gas risk hazard evaluation presented in *Subsurface Investigation Report* dated October 23, 2012 reported no appreciable risks exist downgradient of the Site. One of the findings is that the residences adjacent to and downgradient of the Site are all built using beam and pillar type construction. This type of construction allows fresh air to circulate beneath the home; therefore, vapor intrusion is not an issue.
8. COMMENT: The *Case Closure Review Summary Report* indicates that the site meets Class 3a of the Direct Contact and Outdoor Air Exposure Media-Specific Criteria and states that maximum concentrations in soil are less than those in Table 1 for Commercial / Industrial and Utility Worker exposures. The County believes the future land use is planned to be residential and therefore the case fails the Policy.  
RESPONSE: The case was evaluated based on the Policy Criteria for current land use. Should a change in land use be proposed and approved by the local agency, presumably the developer will be required to meet various requirements that apply at that point in time.