

**Response to the County of Santa Clara,
Department of Environmental Health Department (DEH)
Comments Received January 24, 2014
Claim 4002**

Comment 1: General Criteria: The State Board's review of the site indicates that the unauthorized release is located within the service area of the City of Santa Rosa's public water system. This is in error.

Response 1: Correct, The Closure Summary has been corrected to read; the site is located within the City of Milpitas Community Service Water System.

Comment 2: General Criteria: The State Board's review indicates that the unauthorized release consists only of petroleum. It should be noted that the unauthorized release includes petroleum compounds and non-petroleum compounds including Stoddard solvents, trichloroethene (TCE), tetrachloroethene (PCE), and cis-1,2-dichloroethene (cis-1,2-DCE). The DEH recommends that the State Board include the compounds listed above in their evaluation of the site and exempt the site from the LTCP or clearly state the closure is only for the fuel leak contamination at the site and specifically does not address the presence of solvents.

Response 2: Only petroleum hydrocarbons were stored and subsequently released from the underground storage tanks. The chlorinated solvent contamination is regulated by the Cleanup Program for the Site. The State Water Board's recommendation for closure only covers the UST case.

Groundwater at the Site has reached Regional Water Board Basin Plan water quality objectives (WQO's) for petroleum hydrocarbon constituents listed in the plan in all Site wells. Therefore, the potential for migration of petroleum hydrocarbon compounds is very limited.

In addition, the property west of the Site across the railroad right-of-way was operated as a Class III sludge treatment and disposal facility through July 1989. Sludge generated by the Santa Clara Valley Water District was treated and disposed at the facility. During the cleanup activities, hundreds of 55-gallon drums were discovered. The drums contained the contents of several napalm bombs, liquid solvent (methyl ethyl ketone, acetone, benzene, toluene, ethylbenzene, xylene. In September 1989, approximately 54,000 cubic yards of affected soil was excavated and transported to an off-site disposal facility. The property has been developed as single family residences.

Comment 3: a. General Criteria: The extent of the groundwater has not been defined. All investigative work was completed up to the property line. Beyond the property line is a railroad line and residential developments. Grab groundwater samples collected past the interceptor trench in a utility trench was reported to contain 3,400,000 parts per billion (ppb) Stoddard solvent in 1986. Additional grab groundwater samples collected in 1996 outside of the interceptor trench were reported to have up to 2,4000 ppb cis-1,2-DCE, 100 ppb TCE, 42 trans 1,2-dichloroethene, and 81 ppb Vinyl Chloride. These samples were all collected in the downgradient of the interceptor trench. Therefore, the extent of groundwater contamination in

the downgradient direction has not been defined and residences are present in the downgradient direction.

Response 3a: The petroleum hydrocarbon contamination in groundwater has been defined and as stated in Comment 2 the State Board's recommendation for closure only pertains to the petroleum hydrocarbon contamination. The other contaminants identified historically west of the Site are likely to have been from land use as a Class III sludge treatment and disposal facility. The facility was not licensed prior to 1974. During the cleanup activities over 500 improperly disposed Class 1, 55-gallon waste drums were found on that property. The drums contained the contents of several napalm bombs, liquid solvent (methyl ethyl ketone, acetone, benzene, toluene, ethylbenzene, xylene. In September 1989, approximately 54,000 cubic yards of affected soil was excavated and transported to an off-site disposal facility. The property has been developed as single family residences. The chlorinated solvent contamination is regulated and overseen by the Cleanup Program for the Site.

Comment 3b: The interceptor trench is currently extracting and treating groundwater at the Site. The groundwater conditions at the Site with the interceptor trench not in operation are not known. When groundwater remediation ceases it is common for concentrations of contaminants to increase due to rebound into untreated contaminated soil. If the Site is closed and the groundwater extraction from the trench terminated, groundwater contamination could increase and off-site contaminant migration may increase.

Response 3b: Groundwater at the Site has reached Regional Water Board Basin Plan water quality objectives (WQO's) for petroleum hydrocarbon constituents listed in the plan in all Site wells. Therefore, the potential for migration of petroleum hydrocarbon compounds is very limited.

In addition, the property west of the Site across the railroad right-of-way was operated as a Class III sludge treatment and disposal facility through July 1989.

Comment 3c: The isoconcentration maps in the most recent groundwater monitoring report (Cardno ERI, May 29, 2013) for PCE, TCE, TPH-Stoddard Solvent, and TPH-gasoline indicate that their respective groundwater plumes are not defined. Several of the isoconcentration maps indicate that the concentrations increase with distance from the source. For example, the highest PCE concentrations were detected in groundwater monitoring well OBN2 and EW1 at 120 and 29 ppb, respectively. There are no downgradient sampling points from these two wells. Consequently the plume is not defined.

Response 3c: Chlorinated solvents are regulated under Cleanup Program not the UST Program. TPH gasoline and Stoddard solvents have no WQO in the Regional Water Board's Basin Plan. The petroleum hydrocarbon contaminants of concern are defined and/or reached their perspective WQO.

Comment 3d: Without knowing the extent of the plume, it cannot be determined the proximity of potential sensitive receptors to the plume boundary.

Response 3d: The petroleum hydrocarbon contaminants of concern are defined and/or reached their perspective WQO. Chlorinated solvents are regulated under Cleanup Program not the UST Program.

Comment 4: Media Specific: Petroleum Vapor Intrusion to Indoor Air; The State Board indicated that a site-specific risk assessment for the vapor intrusion pathway has been prepared that demonstrates human health is protected to their satisfaction. There is no mention in this assessment of the presence and the potential threat of vapor intrusion from solvents nor does it state that they were specifically excluded. We find this to be misleading since groundwater is present between 1-9 feet below ground surface, which increases the threat of vapor intrusion of the solvents. The potential threat of vapor intrusion has not been adequately assessed at this site.

Response 4: The site-specific assessment of risk was conducted on the contaminants of concern as described in the LTCP. Chlorinated solvents are regulated under Cleanup Program not the UST Program

Lisa Babcock, Fund Manager Date