ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
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January 13, 2014

Mr. Andrew Cooper
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814
(sent via email to USTClosuresComments@waterboards.ca.gov)

Subject: **Comment Letter – ExxonMobil Corp. Case Closure Summary**
Fuel Leak Case No. RO0000362 and GeoTracker Global ID No. T0600100537,
Valero #3823, 2991 Hopyard Road, Pleasanton, CA 94566

To State Water Resources Control Board:

Zone 7 Water Agency (Zone 7) strongly opposes the closure of the fuel leak case at 2991 Hopyard Road, Pleasanton, CA 94566 based on the significant threat that this degradation of groundwater quality at the site poses to beneficial uses and the fact that this site does not meet the SWRCB's Low-Threat UST Case Closure Policy criteria.

Zone 7 has actively managed the Livermore Valley Groundwater Basin for over 50 years, employing conjunctive use methods (artificial recharge with water imported from the State Water Project). This site is at the heart of the Main Basin and groundwater quality degradation severely hampers the ability to achieve maximum beneficial uses of the Basin. In the last decade, a Salt Management Plan (SMP) was adopted by Zone 7 and approved by the San Francisco RWQCB; the SMP builds on the conjunctive use practice and expands Basin management to include demineralization facilities. The SMP was incorporated into Zone 7's Groundwater Management Plan (GWMP) in 2005. The GWMP also has a strong Groundwater Resource Protection element to focus on various pollution threats to the Basin.

Groundwater typically makes up 15-25% of the water supplied by Zone 7 to its retail water supply agencies. In addition, some of these retail supply agencies operate their own supply wells located in the Basin, as do some independent domestic and agricultural well owners. These additional wells increase the total groundwater usage in the region to approximately 20-40% of the total water use. To continue to meet our reliability goals into the future, Zone 7 has identified the need for additional municipal supply wells to be installed in the Pleasanton area during the next 15 years. Closing cases with significant contamination onsite further limits the already scarce potential well sites available within the urban setting.

In addition, during periods of limited surface water supplies as we have been experiencing the past few years, the need to pump groundwater to meet demands increases. As a result, there may be a need to operate our Hopyard Wellfield wells more and to reactive Pleasanton's Municipal

Well No. 7. Since a connection between the zones of the aquifer impacted by the contamination and the zones of the aquifer being pumped for drinking water has already been established as a part of the investigation of this case, when these wells are operated on a more regular basis, the dynamics could change such that migration of even a previously stable plume could be induced.

Furthermore, according to the Local Oversight Program agency for this case, Alameda County Environmental Health (ACEH), the plume is over 100 feet in length and therefore does not meet the criteria for Scenario 1. The plume is located within the Livermore Valley Groundwater Basin, and is less than 1,000 feet south of Zone 7's Hopyard wellfield and within 250 feet of the City of Pleasanton's Municipal Well No. 7, albeit currently idled, therefore the case does not meet the criteria for any of the scenarios until the plume decreases in length and the City of Pleasanton permanently abandons their supply well No. 7. ACEH has also objected to the closure of this case based on it not meeting the criteria for low-threat closure, adding that the plume has not yet proven to be stable or decreasing which is a criterion for all scenarios.

We feel that case closure is premature and could put the public's water supply at risk. We recommend that the case remain open and that ACEH be allowed to continue providing regulatory oversight until groundwater quality meets the State's MCLs or until conditions change such that the case actually qualifies as one of the SWRCB's Low-threat UST Case Closure scenarios.

We appreciate the opportunity to comment on this proposed case closure. If you have any questions or comments, please feel free to contact Colleen Winey at 925-454-5063 or via e-mail at cwiney@zone7water.com.

Sincerely,

Matt Katen

Matt Katen, CHg,
Groundwater Protection Section Manager
Zone 7 Water Agency

cc: Jerry Wickham, ACEH
Cleet Carlton, SF Bay RWQCB
Daniel Smith, City of Pleasanton
Jill Duerig, Zone 7 Water Agency