

RESPONSE TO SANTA CLARA VALLEY WATER DISTRICT COMMENTS

NGUYEN PROPERTY CLOSURE CLAIM 6653

Comment 1: The extent of the contamination has not been defined. Based on the First Quarter 2010 Groundwater Monitoring Report the groundwater flow direction is generally toward the northwest. Well STMW-3, located approximately 25 feet northwest of the existing tanks, is the most downgradient monitoring point, and 1,000 micrograms per liter ($\mu\text{g/L}$) of TBA was detected in the last sample collected from this well in May 2011.

Response: Although the 2011 groundwater monitoring results have not been uploaded to GeoTracker, a copy of the results were included with the County of Santa Clara comment letter. The results show that TBA was detected at 1,000 $\mu\text{g/L}$ in monitoring well STMW-3. However, the San Francisco Regional Water Quality Control Board Basin Plan does not have a water quality objective for TBA. In addition, the California Department of Public Health Response Level for TBA is 1,200 $\mu\text{g/L}$. This is the concentration where water providers must either treat the water before supplying the water to their customers or take the supply well out of service. The highest concentration of TBA currently in the groundwater where is less than 1,200 $\mu\text{g/L}$. Consequently, the only two petroleum constituents that remain in the groundwater at this site that exceeds the water quality objectives are MTBE in source area well MW -1 at 53 $\mu\text{g/L}$ and downgradient well STMW-3 at 6.5 $\mu\text{g/L}$ and benzene in MW-1 at 16 $\mu\text{g/L}$, STMW-3 at 7.1 $\mu\text{g/L}$ and STMW-4 at 2.9 $\mu\text{g/L}$. Based on the rapid decrease in the concentration of MTBE between these two wells, the residual dissolved plume of MTBE and benzene is projected to not extend beyond sidewalk of the subject site before meeting the water quality objective for MTBE of 5 and benzene of 1 $\mu\text{g/L}$.

Comment 2: Our records indicate there is an active water supply well and potentially two abandoned wells in the site vicinity. The active water supply well is located approximately 320 feet southwest of the fuel islands. The abandoned wells are located approximately 50 feet southwest and 800 feet north-northwest of the fuel islands.

Response: 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. According to data available in GeoTracker, there are no California Department of Public Health regulated supply wells within 250 feet of this site. No other water supply wells were identified within 250 feet of the site in the files reviewed. Furthermore, the rose diagram included with the County's comments indicates predominate groundwater flow direction of northwest (more than 70% of sampling events). Fund staff also noted that the referenced groundwater production well is actually an agricultural irrigation well located in Emma Prusch Park and is not intended to provide drinking water. According to the City of San Jose, this well is only used for demonstration purposes a few times a year. It was the intent of the City Park's Recreation and Neighborhood Services Department to connect the well to a waterline to provide

irrigation to the orchards and gardens in the park. However, this connection has not been implemented.

Additionally, the suspected abandoned well located 50 feet northwest of the pump islands would be located beneath South King Road. As the City of San Jose widened/improved South King Road the well would have been properly destroyed. The suspected abandoned well 800 feet north-north west of the pump islands is outside the radius to meet the Low Threat Closure Policy criteria.

Comment 3: The District supports the States Board's effort to pursue closure of sites that no longer pose a threat to human health and the environment. Prior to considering this case for closure, the District believes the following actions at a minimum, are required:

- The lateral and vertical extent of contamination must be defined.
- An effort should be made to locate and properly destroy the nearest abandoned well, if necessary.
- A sample should be collected from the nearby water supply well and have it analyzed for fuel constituents and oxygenates.

Additional actions, such as remediation, may or may not be required depending upon the findings of the investigation of the extent of contamination.

Response:

- The plume has been defined to water quality objectives or in the case of TBA to the California Department of Public Health standards discussed above.
- The term abandoned well means the wells has been abandoned/destroyed properly. In addition the well 50 feet northwest of the pump island would be located in South King Road which the City Street Department would have properly abandoned during street work.
- The City Park irrigation well is outside the distance specified in the Low Threat Closure Policy criteria therefore unnecessary.