

RESPONSE TO ALAMEDA COUNTY LOP COMMENTS DATED 8/7/2013
Claim 8694, Oro Loma Sanitary District, San Lorenzo CA

1. COMMENT: The Site does not have a Conceptual Site Model.
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.*” These documents are available in the GeoTracker database and adequately define the nature, extent and mobility of the petroleum release.

2. COMMENT: The County noted that numerous soil samples that documented significant residual contamination downgradient or otherwise outside the remedial excavation. Because significant soil contamination is documented to remain at the site (up to 34 mg/kg benzene in soil in the water-bearing zone), the capability of the site to naturally attenuate benzene at the site remains undetermined.
RESPONSE: It is a well-documented the petroleum hydrocarbons degrade in nature. The RP excavated approximately 533 cubic yards of impacted soil in 2008. Some impacted soil was left in place in order to protect infrastructure and the foundation of buildings. While the 40-foot by 45-foot by 8-foot excavation was open (several weeks) only 100 gallons of water collected in the excavation. This documents that the soils are very tight and will not allow contaminants to migrate. The exposure to future construction workers is significantly reduced due to the Sites current operations (a publically owned wastewater treatment works (POTW)) because they will be trained and prepared to encounter far more toxic substances than gasoline.

3. COMMENT: The USTCF’s *Case Closure Review Summary Report* indicates that a professional assessment of site specific risk from vapor intrusion has been conducted and shows that the maximum concentrations of petroleum constituents will have no significant risk of adversely affecting human health. ACEH notes that the maximum soil concentrations cited in the *Case Closure Review Summary Report* are in error.
RESPONSE: The building in question is constructed using beam and pillar type construction. This allows outside air to ventilate the crawl space beneath the structure, therefore, indoor air is not an issue. The soil sample concentrations cited in the Review Summary Report were the most recent data collected as stated in the report not maximum values reported throughout the life of the case.

4. COMMENT: The County notes that the maximum soil concentrations for benzene and ethylbenzene cited in the *Case Closure Review Summary Report* are in error.
RESPONSE: The *Case Closure Review Summary Report* did not report maximum soil concentrations. It reported most recent concentrations. This is stated as such in the report.