



Countywide Services Agency

Environmental Management
Department

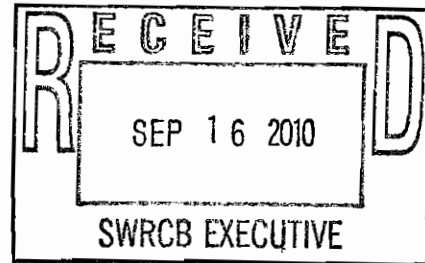
Environmental Compliance Division
Elise Rothschild, Acting Chief

County of Sacramento

Steven C. Szalay, Interim County Executive
Bruce Wagstaff, Agency Administrator
Val F. Siebal, Department Director

September 15, 2010

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
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Sacramento, CA 95812-0100
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Dear Ms. Townsend:

**SUBJECT: October 19, 2010 Board Meeting
UST Case Closure
Sacramento Valley Crane Service
7037 Power Inn Road, Sacramento, CA
USTCF Claim No. 14560**

The Sacramento County Environmental Management Department (EMD) is writing to provide comments on the proposed UST case closure cited above. Our comments are both general and specific and are presented following.

General Comments

Previous State Water Resource Control Board (SWRCB) UST closure petition decisions have relied on the concept, first expressed in the 1998 *Walker* decision that:

"The approximate time period in which the requisite level of water quality for dissolved petroleum hydrocarbons and oxygenate compounds will be met is estimated to be decades to hundreds of years. Though the requisite level of water quality has not been met, water quality objectives will be achieved via natural attenuation in decades to hundreds of years. This is a reasonable period in which to meet the requisite level of water quality because the affected groundwater is not currently being used as a source of drinking water and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the future."

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We interpret "decades to hundreds of years" to mean "less than a thousand years". In the present Sacramento Valley Crane case, monitoring well MW-2 had a pre-remedial increasing MTBE trend. Active remediation ceased approximately three years ago, and the last two years of monitoring suggest that MTBE concentrations may be increasing again in MW-2. Because the post-remedial concentrations in MW-2 are increasing, it is impossible to predict with any certainty that the requisite water quality objectives will be met within decades to hundreds of years. Therefore it would appear to be illegal to close the site.

As noted in the SWRCB staff *Case Closure Summary* for the site, there is Florin Water District water supply well located approximately 300 feet down-gradient of MTBE-impacted well MW-2. The *Summary* notes that "the reported perforated interval for this well is 170 to 290 feet bgs, which is 100 feet deeper than the depth of the impacted groundwater below the site". While this information appears to be correct, the *Summary* fails to mention that the sanitary surface seal on this well extends only to 40 feet bgs, which is 30 feet *above* the depth of impacted groundwater. If MTBE were to migrate laterally to the vicinity of this water supply well, it would encounter a direct conduit to impact groundwater at 170 feet bgs. This agency believes it would be prudent to continue to monitor MTBE concentrations in well MW-2 to evaluate whether or not concentrations continue to increase. If MTBE concentrations continue to increase, beneficial use of water quality in the adjacent supply well faces a substantial likelihood of becoming impaired. Therefore this Agency believes it is not in the best interests of the people of the State of California to close the site at this time.

If you have any questions regarding the above comments, you may contact me by telephone at (916) 875-8506, or by e-mail at marcusb@saccounty.net.

Sincerely,



Barry Marcus, P.G.
Supervising Environmental Specialist
Local Oversight Program

BIM:bm

c: Cori Condon, CVRWQCB
Ben Heningburg, SWRCB
John Russell, SWRCB
Florin Water District