REMEDIATION TESTING AND DESIGN, INC.

Environmental

Investigation

Remediation

Natural Attenuation

Closure

A California Corporation

P.O. Box 1356, Santa Cruz, California 95061-1356

E-mail: RTDInc@rtd-environmental.com

Ph: (831) 458-1612 Fax: (831) 458-1509

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Mobile: (831) 246-1819

October 30, 2012



State Water Resources Control Board c/o Jeanine Townsend Clerk to the Board 1001 I Street, 24th Floor Sacramento, CA 95814

SUBJECT

Comment re: Directing Additional Actions to Improve the Underground Storage

Tank Cleanup Program

Dear Chair and Board Members:

Remediation Testing and Design, Inc. (RTD) is pleased to submit comments on the Draft Resolution Directing Additional Actions to Improve the Underground Storage Tank Cleanup Program prepared by staff of the State Water Resources Control Board (SWRCB

RTD is in *full agreement* with the proposed resolution presenting the Low-Threat Closure Policy Implementation Plan.

The recently published LUFT Manual indicates that the only recourse for overturning decisions by a CUPA Agency is via the courts. Do AB 1701 and AB 1715 grant authority to the SWRCB over CUPA regulated sites?

Sincerely,

REMEDIATION TESTING AND DESIGN, INC.

Howard E. Whitney, #PG 4860, #CHG 193

Professional Geologist, Certified Hydrogeologist