



Huntin

March 19, 2012

Mr. Charles R. Hoppin, Chairman  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 98512-0100

Sent via facsimile (2 pgs) to: (916) 341-5620

**RE: DRAFT LOW-THREAT UNDERGROUND STORAGE TANK CASE CLOSURE  
POLICY**

Dear Mr. Hoppin,

I am a registered professional engineer with over 15 years of experience as an environmental consultant with an emphasis in soil and groundwater remediation. I have reviewed the Draft Low-Threat Underground Storage Tank Case Closure Policy (Policy) dated January 31, 2012, and have concerns with the proposed Policy, as do many others in the environmental industry. I would urge you to reconsider the following issues that would potentially impact shallow groundwater, and in the long term, the public:

- The Policy allows for relatively high levels of benzene and MTBE to remain in soil and groundwater under certain conditions. The threat that these and other chemicals pose to groundwater and the public can increase substantially if there are changes in property use, installation of additional production wells near the property, or there is an increase in the pumping of beneficial groundwater from a public water system in which the affected property is located.
- Population increases and the subsequent increase in demand for drinking water will likely force municipalities to explore utilization of groundwater in areas that are currently not used. Expansion of groundwater production, be it through the installation of additional wells, or through increased extraction, may draw groundwater that has been impacted by petroleum hydrocarbons that was allowed to remain untreated due to this Policy. The risk to public health, and/or the reduction of useable water has not been adequately discussed in the Policy.
- The Policy does not account for the diminished value of the property with respect to relatively high concentrations of contaminant left in place. It is likely that though the property will be closed by a regulatory agency under the proposed Policy, a deed restriction will most likely be imposed on the property limiting its use and reducing its value. The very nature of the such a deed restriction underscores the fact that a potential human health risk exists, which defeats the purpose of the Policy!

- Only benzene and MTBE are addressed in the Policy. Tert-Butyl Ether (TBA) is not addressed in the Policy. A discussion and guidance for evaluation and threat reduction of TBA should be included. There is a wide variation in opinions within the regulatory community on the human health risks associated with TBA.

I appreciate your time and consideration in this matter. I truly believe that this proposed policy will cause more harm and confusion than good.

Sincerely,



Ed Rands, P.E.  
Senior Project Engineer  
PE #58183