



County of Sacramento

July 8, 2013

Mr. Pete Mizera
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814

Dear Mr. Mizera:

**SUBJECT: COMMENT LETTER - A & A BUILDING SUPPLY CASE CLOSURE SUMMARY
6700 FOLSOM BOULEVARD, SACRAMENTO, CA 95819; RO0000483**

The Sacramento county Environmental Management Department (SCEMD) has reviewed the Public Notice issued by the State Water Resources Control Board (SWRCB) for the closure of 6700 Auburn Boulevard, Sacramento, CA (Geotracker No. T0606700118 and USTCF Claim No. 17716). It is this Department's view that this site does not meet the SWRCB's Low Threat Closure Policy for the following reasons:

1. The extent of the plume has never been adequately defined;

The four wells that SWRCB staff used to determine the extent of the contamination at the site are located almost in a straight line cross-gradient to the predominant groundwater flow direction (south south-west). This flow direction calculation is based on the groundwater elevations from an adjacent site where a sufficient number of wells are installed at locations far enough apart that the inherent inaccuracy of flow direction calculations is minimized. Experience has shown that using four wells that are generally in a straight line, with only approximately 20 feet offset, to define a flow direction can be highly inaccurate.

At times, based on calculations from the adjacent site, the flow direction is to the south south-east. This flow direction is also cross-gradient to the wells located at 6700 Folsom Boulevard. Please see Attachment A and Attachment B, respectively, for the alignment of the wells and the rose diagram showing the flow directions. Attachment C shows the concentrations found in the wells during the last sampling round (2010).

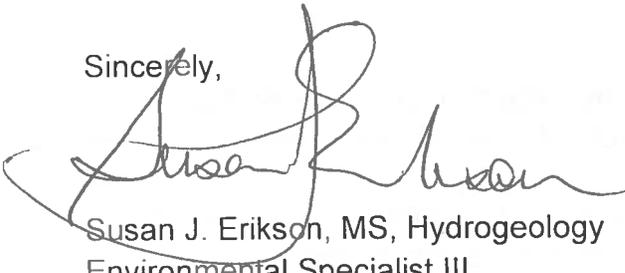
It is our opinion that it is not scientifically realistic to conclude that this site has been adequately defined. Note that we are not including MW-16 (which is also generally in a straight line with the other four wells) as a relevant monitoring well – the source of the contamination in this well may not be related to the tanks that existed on the site.

2. The potential for indoor air intrusion has not been evaluated; and
3. No sensitive receptor survey, notably the existence of either Municipal or domestic water supply wells, of the area has been conducted.

SCEMD approved a workplan on August 26, 2011 to attempt to define the plume using a soil gas survey. The work was never conducted.

We would be glad to discuss this issue further. Please contact Sue Erikson at (916) 875-8433 or via email at eriksons@saccounty.net.

Sincerely,



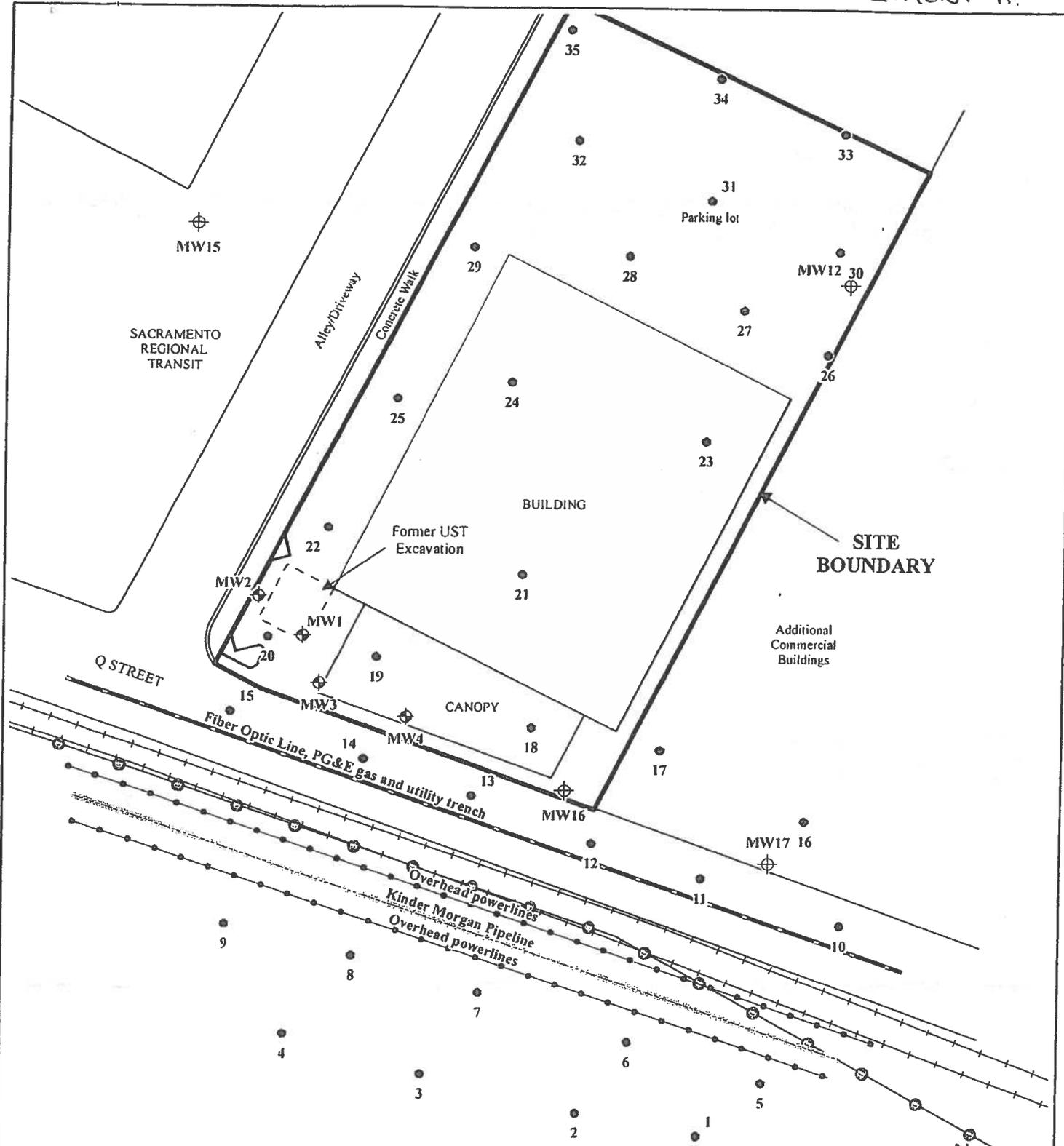
Susan J. Erikson, MS, Hydrogeology
Environmental Specialist III



Cheryl A. Hawkins, REHS
Supervising Environmental Specialist
Site Assessment/Mitigation Group

c: Cori Condon, CV-RWQCB
Vera Fischer, CV-RWQCB

SJE:jm



Projection: NAD 83, California State Plane, Zone 11

Legend

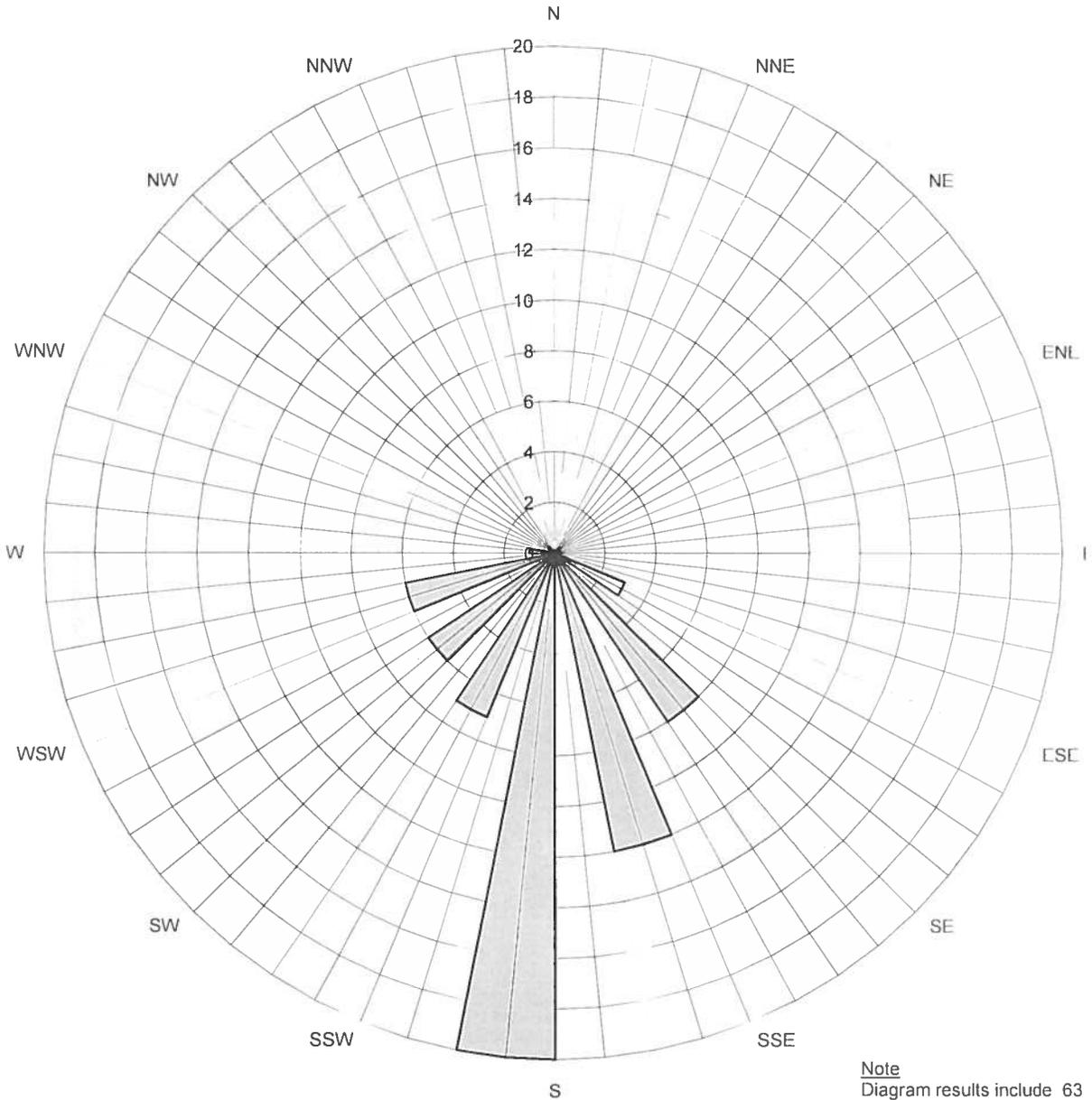
- Proposed Gore Sorber sample location
- ⊕ Monitoring well location (Secor)
- ⊕ Monitoring well location (Onsite)
- UST Underground storage tank



SITE PLAN
6700 FOLSOM BOULEVARD
Sacramento, California

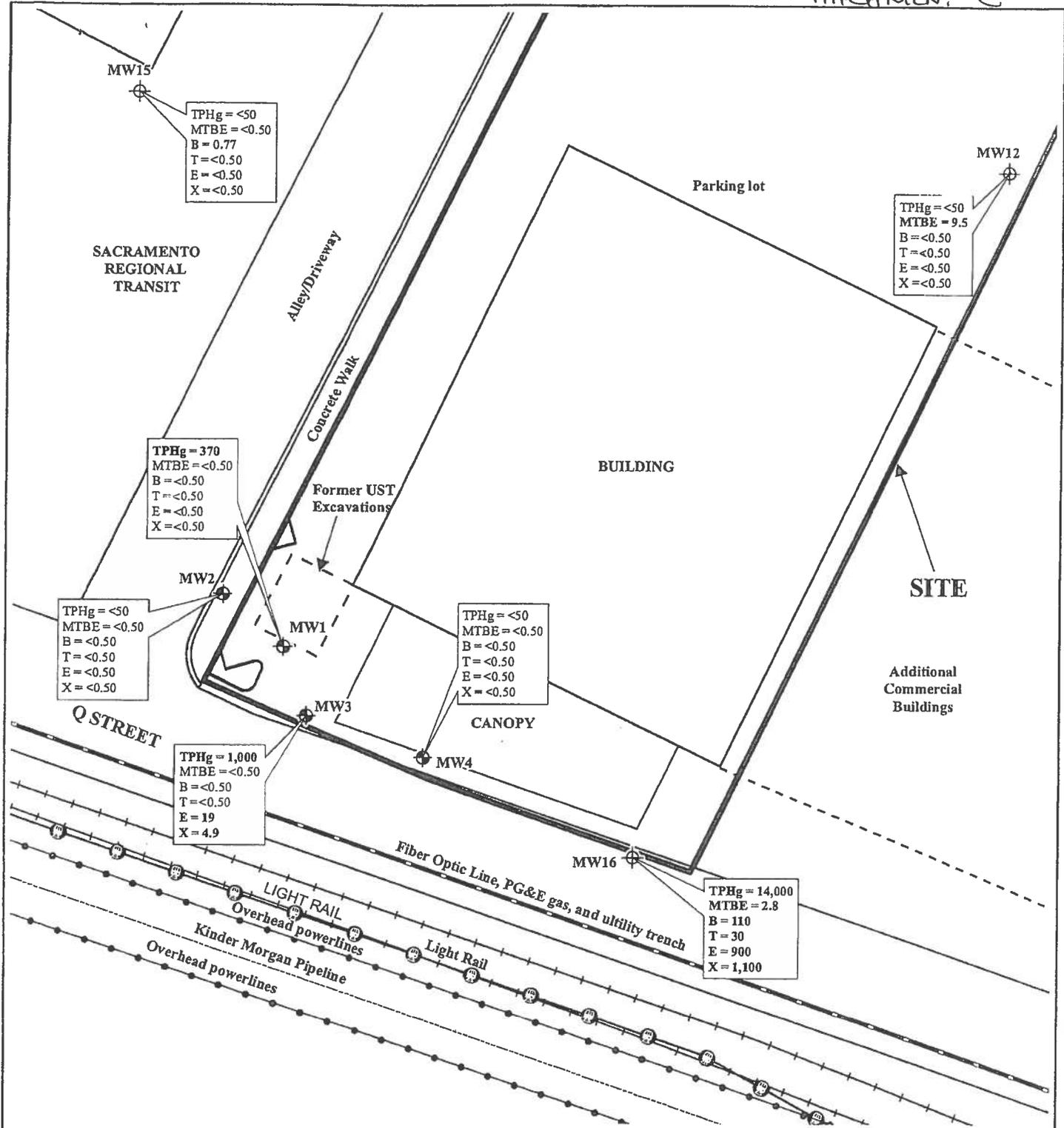
| | |
|------------------------|------|
| FIGURE 1 | |
| DRAWN BY | TJC |
| CHECKED BY | MLC |
| PROJECT MGR | MAT |
| DATE | 5/11 |
| WKA NO. 5223.10 | |

FIGURE 5
Groundwater Flow Direction Rose Diagram
Former Eagle
6661 Folsom Blvd
Sacramento, California



Note
Diagram results include 63 significant directional components from first quarter 2005 to third quarter 2010.

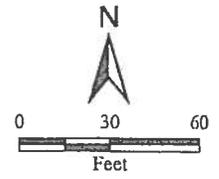




Adapted from data provided by the Sacramento Area Council of Governments, 2008 and a CAD drawing prepared by Morrow Surveying. Projection: NAD 83, California State Plane, Zone II

TPHg Total petroleum hydrocarbons-as-gasoline
 MTBE Methyl-tert-butyl-ether
 B Benzene
 T Toluene
 E Ethylbenzene
 X Total xylene
 Concentrations in micrograms per liter (µg/L)

Legend
 ⊕ Monitoring well location (Wallace-Kuhl & Associates)
 ⊕ Monitoring well location (Secor)



| | | |
|--|---|---|
| | DETECTED CONCENTRATIONS MAP 6700 FOLSOM BOULEVARD Sacramento, California | FIGURE 4 |
| | | DRAWN BY: TJC CHECKED BY: MOB PROJECT MGR: DBN DATE: 9/10 WKA NO. 5223.09 |