

**Environmental Management
Department**

Val F. Siebal, Director



County of Sacramento

Divisions
Environmental Compliance
Environmental Health

12814

September 3, 2013

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

Dear Mr. Mizera:

**RE: COMMENT LETTER – AUTOMATIC MERCHANDISING CASE CLOSURE SUMMARY
935 ARDEN WAY, SACRAMENTO, CA 95815
RO184**

In response to the July 3, 2013, *Notice of Opportunity for Public Comment* for the subject property, it is the opinion of the Environmental Compliance Division (ECD) that the site does not meet the Low Threat Closure Criteria due to the following reasons.

1. The contaminant plume is greater than 100 feet in length and its distance to the nearest municipal well is approximately 565 feet. The municipal well owner should be notified of the pending closure since the municipality plans to reactivate the well.
2. A seasonal trend analysis should be performed to show if increasing trends in post remedial source area wells MW-105 and MW-106 are due to groundwater fluctuations.
3. At the time of the tank removal, TPH-g was detected at concentrations as high as 5,900 mg/Kg at a depth of 13 feet, but only 4 feet from the building. No samples were ever collected in this region at a depth of less than 10 feet. Without shallow soil and vapor samples, vapor intrusion to indoor air and direct contact exposure cannot be evaluated.

If you have any questions, please contact me at (916) 876-7560.

Sincerely,


Jack Bellan
Environmental Specialist III
Site Assessment and Mitigation

JJB:tk

c: Vera Fischer, CVRWQCB
Brian Busch, Closure Solutions, Inc.
Mr. Tom Lahey, Parina Enterprises, and Bosley Family Trust c/o Roger Hoffmore, P.G.

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