

**Response to Alameda County LOP Email Concerns dated November 3, 2014  
Regarding the Proposed Closure of Unocal #5484, Claim 6627**

**Concerns 1, 3 & 4.** Data available to ACEH suggests that an open channel of Chabot Creek may be within 200 feet of the site in the cross- to down gradient direction.

**Response:** According to the USGS 7.5 minute map and Google Maps the distal end of the defined plume boundary is in excess of 500 feet from Cabot Creek, which meets the Groundwater Specific Criterion Class 1 distance of 250 feet.

**Concern 2.** Total petroleum hydrocarbons as gasoline (TPHg), tertiary butyl alcohol (TBA) and 2-methylnaphthalene at 1,900 micrograms per liter ( $\mu\text{g/L}$ ), 480  $\mu\text{g/L}$ , and 20  $\mu\text{g/L}$ , respectively, in the down gradient monitoring well MW-7. These concentrations are at least an order of magnitude above the Environmental Screening Levels (ESLs)

**Response 2:**

a. The Policy uses the Water Quality Objectives (WQO's) from the Regional Water Board Basin Plan in which each site is located.

b. ESL's developed by the Regional Water Board (Region 2) are not regulatory numbers and the Regional Water Board has not adopted numeric water quality objectives for TPHg.

c. The Regional Water Board, Basin Plan does not have a numeric water quality objective value for TBA. The 12  $\mu\text{g/L}$  for TBA is a Notification Level, and the Response Level of 1,200  $\mu\text{g/L}$  is the concentration at which water purveyors have to treat the water prior to delivery. It is unreasonable to remediate water to a 100 times cleaner than can be delivered to a drinking water customer's tap.

d. The 2-methylnaphthalene concentrations detected in Site well MW-7 is below the USEPA MCL for 28  $\mu\text{g/L}$  as listed in Marshack's "*Compilation of Water Quality Goals*" prepared by Regional Water Board (Region 5) and therefore meet the Policy criterion for closure.