

The report concluded that the leak/spill site was classified as a “low-threat” site; that it conformed to the State Water Board’s “ Low Threat UnderGround Storage Tank Case Closure Policy. (<< http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf >>).

However, it did not conduct the investigation as required of the Policy.

(1. The Policy criteria requires that a conceptual model of the site conditions and environment be made. This was not done in any meaningful fashion. A significantly flawed interpretation of the site hydrogeology was submitted as part of the report’s discussion.

The conceptual model, so-called in the report, states that it assumes that groundwater is greater than 120 feet below ground surface. The report explains that this assumption is made because another investigation made a similar report. The other investigation was located at a gas station to the north of this facility, was 60 feet higher elevation, and is a half mile distant. Because the terrain is irregular, the two facilities separated by a creek and canyon, the comparison is erroneous.

The conceptual model is in the report flawed, because it assumes a depth to groundwater of 120 feet below ground surface or greater. However, the elevation of the Aptos leak site is at 110 feet above mean sea level (msl); the bottom of the excavation approximately 90 feet msl, and the 2 creeks on either side of the of the site are perennial streams (USGS solid blue line) and therefore recharged by groundwater year-around. The beds of those creeks between 40 and 60 feet above mean sea level. The site is about midway between the two creeks, consequently the standing water level of groundwater will be significantly above the level of the constant streams levels.

Given that the subsurface material are silt and sand, as described in the report, it means the subsurface materials are highly to moderately conductive of groundwater flow. Therefore, the threat to groundwater is greater than erroneously concluded in the report.

At the very least, the report deficiencies must be addressed and all the requirements of the Policy be met before the site can be closed.

Please consider re-opening the Aptos Village Project UST contamination case, issuing an order that developer Barry Swenson Builder be required to sample the true UST location soils under direct supervision of Santa Cruz County Environmental Health Hazardous Materials / UST Specialist Mr. John Gerbrandt, and that punch tests of area groundwater be conducted to ensure the contamination is fully remediated. I ask this for the health and safety of the Aptos Community and local environment.

Please feel free to contact me for further information.

Sincerely,
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