



Application of Hydrologic Regions to Geology is to the geologic factor of rock formations is not indicated. Negligent is the omission of the that factor in relationship to petroleum sequestered in those formations, the measurement of pressure, the type of rock formation and absorption quality and the potential for subsidence.

Also, not mentioned, are missing maps from the California Geological Survey for earthquake faults in vulnerable areas.

We see no guidance for monitoring and testing except to reduce the time spent on those processes.

Missing are the qualifications required to test, monitor, review and close the case. We do not see how the public is being protected.

We say this, because of the Total Daily Maximum Loads and lack of Source Point identification cause continuous unidentified pollutants, suspect to petroleum and gas migration and results of fracking practices (not monitored by the California Division of Oil, Gas and Thermal Resources DOGGR.)

Water Quality will never improve.

These tanks appear in Methane Zones or Methane Buffer Zones which increases risk of contaminants and an extreme threat to Public Health and Safety. Again, the practice of fracking to extract oil has surfaced in Southern California which should change your policy to one of extreme precaution for the Public Health and Safety.

We do not see that you have addressed this issue as part of the overall petroleum problem existing in petroleum source point areas.

Though not in your jurisdiction, you should address Air Quality and the California State Implementation Plan in this policy. Hydrogen sulfide is an issue.

Testing and reporting of the air quality should be required before closure. You need to acknowledge density in urban areas and the epidemiological effect.

Affordable Housing, Department of Housing and Urban Development and California Debt Limit Allocation Committee funded, Department of Treasury New Markets Tax Credit and other financial factors are a reality around Major Projects in UST areas.

Low-Threat determinations need exacting substantiation not selective substantiation.

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