

>>> On 11/8/2011 at 11:55 AM, in message
<1320782137.60729.YahooMailNeo@web161405.mail.bf1.yahoo.com>, Joyce Dillard
<dillardjoyce@yahoo.com> wrote:

Comment Letter–Low-Threat UST Closure Scoping Document due 11.8.2011 Noon

You are underestimating the threat and danger of LUST identified locations and have not tied in CEQA Monitoring and Mitigation practices by responsible agencies. You have not addressed Public Services such as fire.

Part of the challenges in a statewide document is the identification on a geographical, regional basis.

You have a significant problem in the South Coast region because oilfield conditions exist in highly populated areas.

There are impacts, not listed, on:

Mineral Resources Geology and Soils Public Services Air Quality Hydrology and Water Quality Utilities/Service Systems

Any leakage combined with other underground issues, such as leaking sewer pipes with methane risks and liquefaction, would effect groundwater and water quality. There is no consideration of overweight trucks traveling over surfaces of LUSTs.

Here, you should address Total Daily Maximum Loads and its impact on water. You have not addressed the Clean Air Act and the air quality issues of leakage.

You have not addressed the need for Public Services in cases of explosions.

The South Coast Air Quality District SCAQMD is not in compliance with criteria of the Clean Air Act. You need to recognize your limitations, as a Water Board, and consider the Public Health and Safety of the public.

Where is the responsible monitoring and testing. Who sets the criteria and who executes the process. Is information being disclosed to the public.

Health issues need to be mapped and monitored. Are there cancer clusters because of contamination.

Are earthquake faults mapped. Is subsidence being addressed.

Are there contributions to TMDL issues and how do Best Management Practices eradicate the contamination problems. Is Low Impact Development being addressed as a solution or a problem.

You state:

This policy relies on the regulatory agency's use of the conceptual site model to identify the special attributes that would require specific attention prior to the application of low-threat criteria.

So how is LOW THREAT become NO THREAT. What collateral damage allowances are you addressing. Can the State cover the liability.

Southern California Bight is being addressed by NOAA and State scientists as well as the military as a threat to National Security with Climate Change. How is that being addressed in this closure issue Scenarios do not address the threat to the life of a child. Be realistic.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031