

**RESPONSE TO SACRAMENTO COUNTY COMMENTS
AUTOMATIC MERCHANDISING CLOSURE CLAIM 12814**

Comment 1:

- a) The contaminant plume is greater than 100 feet in length,
- b) Its distance to the nearest municipal well is approximately 565 feet, and
- c) The municipal well owner should be notified of the pending closure since the municipality plans to reactivate the well.

Response:

The contaminant plume satisfies groundwater media-specific criterion 1.1 except that the plume may be about 130 feet long and 1.1 requires the plume be less than 100 feet and the contaminant plume satisfies criterion 1.2 except the distance from the plume to the nearest water supply well, the inactive municipal well City Well 112, is 565 feet and is required to be greater than 1,000 feet. Instead, the case satisfies Policy groundwater media-specific criterion 1.5, which allows the regulatory agency to determine, based on an analysis of site specific conditions that the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable time frame.

- a) Concur that plume that exceeds water quality objectives for petroleum constituents is between 100 feet and 130 feet long.
- b) Concur that the nearest municipal well is approximately 565 feet from the plume. Any potential impact from petroleum on the municipal well (City Well 112), would have occurred before now – especially since the petroleum release occurred over 24 years ago and significant source material has been removed through remediation. City Well 112 has not operated in eight years due to the presence of a PCE plume 300 feet away (which has not been detected in the municipal well).
- c) Notification was conducted in compliance with the Policy, including notification of the owner of the municipal well, the City of Sacramento. No comment was received from the City during the Public Notice period. The municipal well owner has stated that future plans for this well have not been determined (email from Mark Elliott, P.E., Sacramento Department of Utilities, 10/1/13).

Comment 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.

Response: A spike in contaminant concentrations immediately after the air sparge/soil vapor extraction remedial test conducted in April 2010 was noted in well MW-105; however, concentrations have since returned to levels consistent with pre-remedial test concentrations. Analysis of existing data indicates no clear seasonal trend. The plume is stable and decreasing.

Comment 3: At the time of the tank removal, TPHg 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.

Response: Excavation activities conducted during tank removal were extended next to the building to the extent practicable. It has been nearly 20 years since the excavation. The north side of the building where the tanks were located is a warehouse space with three rollup doors. Ventilation in such a building is usually considerable to maintain air conditioning/heating as well

as due to natural ventilation associated with the doors (both open and closed). The surface is paved, both inside and outside the building. Exposure to petroleum hydrocarbon vapors, though likely due to nearby automobile operation, is unlikely to occur as a result of the residual soil contamination. Direct contact with the residual soil contamination is unlikely due to the pavement as well as the site use.