

**Objections to Closure and Responses for
Sunset Property Services Located at 16251 Construction Circle, Irvine
Claim 18714**

The Review Summary Report recommending closure was emailed to the Orange County Health Care Agency (County) on May 18, 2015, with a request for comments or a teleconference. The email requested a response by June 2, 2015. On May 28, 2015, the County requested a copy of the Objections to Closure and Response for review (included below), which State Water Board emailed to the County on May 29, 2015. No further communication or a request for teleconference was received by June 2, 2015. State Water Board staff determined that the lack of response indicated the County had no objections to closure.

According to the closure denial letter dated, October 24, 2014, the County objected to UST case closure for the following reasons:

Comment 1: The case does not meet Policy groundwater criteria because total petroleum hydrocarbons as gasoline (TPHg) and tert-butyl alcohol (TBA) concentrations increased since 2012.

Response 1: There are no water quality objectives for either TPHg or TBA. Minor fluctuations in source area wells MW2 and MW3 are not indicative of an unstable or mobile groundwater plume. The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives (WQOs) is less than 100 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary.

Comment 2: Secondary source removal has not been completed at the Site. The 2005 tank removal report states that the excavated material was used as backfill.

Response 2: The Policy requires secondary source removal and/or active remediation only if these actions are warranted. The historical and current groundwater data for the Site indicate that no significant source remains and that natural attenuation has, and will continue to reduce residual concentrations to below the WQO.