

## Response to Alameda County's Comments to the USTCF's Closure Summary for Claim 6001

Alameda County comments have been consolidated:

### 1. **Potential impacts to the public safety, the environment and wells in the area.**

RESPONSE: Concentrations of petroleum hydrocarbons that remain in the source area (on-site) are very limited in nature, stable and not migrating as evidenced by down gradient well MW-6 (~60 feet downgradient of the source area) which has been at or below WQO's since 2002.

### 2. **Other sources of petroleum hydrocarbons**

RESPONSE: The City of Piedmont has only recently started (2012) to investigate their former gasoline and diesel UST's (upgradient and crossgradient) that a release was reported in 1988, according to GeoTracker both TPHg & TPHd were identified in shallow soil and groundwater.

### 3. **Lack of characterization of secondary sources**

RESPONSE: According to the Low Threat Closure Policy (LTCP) the "secondary Source" is defined as that soil immediately adjacent to and beneath the underground storage tank(s). Impacted soil (secondary source) was removed at the time of the UST replacement. Additionally, the site is underlain by very shallow bedrock which limits the extent of any remaining residual petroleum hydrocarbons to a very small basin constructed to install the USTs. Further assessment is not warranted. A geophysical survey was recently completed (early 2012) confirming additional UST cavity(s) were not present at the Site beneath the pavement.

### 4. **Notification Process Lacking**

RESPONSE: The Fund Manager believes the level of notification was adequate with the exception of the fee title owner not being notified. It was misunderstood that Chevron owned the property. The notification list was corrected and has been re-noticed.

### 5. **Application of the Low Threat Closure Policy Checklist Incomplete**

RESPONSE: The checklist included in the summary is being used statewide to evaluate sites under the LTCP. The checklist was approved for use by the Division of Financial Assistance, Division of Water Quality and Office of Chief Counsel. Reviews by multiple professionally registered staff occurred during the preparation of the Closure Summary Review and was deemed to be complete.