

Fund response to Tulare County LOP's comments regarding the Public Notice of Claim# 8575,
Gas & Goodies
1076 E. Ranking Road Tulare, CA

- Secondary Source has not been removed to the extent practicable.

Response: The file does indicate the impacted excavated soil was used as backfill in the UST excavation in 1995. Subsequent soil sampling in the area indicated minor residual concentrations of petroleum hydrocarbons were present at depths greater than 15 feet below ground surface (bgs) to a depth of 38 feet bgs. This indicates that 15 feet of import soil was used to completely fill the excavation. This allows for a 15 foot bioattenuation zone well within Policy criteria.

- Soil and Groundwater Remediation Pilot testing results reported incorrectly in the Closure Summary.

Response: Yes, the rate of recovery was incorrectly stated at 3.5 pounds per day instead of 3.4 pounds per hour in 2007. No further remedial actions were taken until 2012 when a vapor extraction system was installed but not operated. Since that time the Low Threat Closure Policy has been adopted and the Site now meets the Policy criteria.

- Groundwater Specific Criteria: Plume length underestimated and the distance to the nearest production well misrepresented.

Response: The plume length even using historic monitoring data from well MW-4 would still provide a projected plume of less than 100 feet in length. Groundwater flow beneath the Site is and has been historically to the northwest, the production well that is 643 feet southeast of the Site in an upgradient location. The Policy Class 1 specifies a distance of 250 feet from the leading edge (defined plume boundary) to a production well or surface water body.

- Vapor intrusion to Indoor Air Criteria: During the installation of the vapor extraction system in late 2011, old piping was found. Discolored and soil with petroleum odors were observed indicating that additional investigation of this old piping configuration is necessary.

Response: The Site is commercial petroleum fueling facility therefore, exempt.

- Because the excavated soil was used to backfill the excavation the Direct Contact Criteria was not met.

Response: Based on the soil data presented in your response letter regarding residual hydrocarbon concentration in the former UST location, soil samples that contained any detections of petroleum hydrocarbons were below 15 feet bgs indicating imported material was brought in to complete the filling of the excavation. Shallow soil sample results (0 – 5 and 5 - 10 feet bgs) meet the criteria presented in Table 1 of the Policy.