ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
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January 29, 2014

Mr. Jerry Wickham
Alameda County Environmental Health Services Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(sent via email to jerry.wickham@acgov.org)

Subject: **Comment Letter - Potential Case Closure of Fuel Leak Case RO0000278 Desert Petroleum #795, 2008 First Street, Livermore, CA**

Dear Mr. Wickham,

Zone 7 Water Agency (Zone 7) opposes the closure of the fuel leak case RO0000278 at 2008 First Street, Livermore, CA because the plume has not been proven to be stable or decreasing which is a required criterion for all closure scenarios set forth in the State Water Resources Control Board's (SWRCB's) Low-Threat Underground Storage Tank (UST) Case Closure Policy. The justification for closure is based on one round of groundwater sampling, which in our opinion does not substantiate the plume to be stable or decreasing.

MTBE was non-detect in monitoring well MW13 during the most recent groundwater quality data available in GeoTracker (Quarterly Groundwater Monitoirng and Remediation Report, First Quarter 2013). However, MTBE was detected in this well for five consecutive sampling rounds prior to this. Two of these detections were above the primary maximum contaminant level (MCL) of 13 micrograms per liter (ug/L) and all detections were above the secondary MCL of 5 ug/L. The most recent sampling event was not the first time MW13 has tested non-detect for MTBE. In the fourth quarter 2008 sampling event MTBE was not detected in MW13 but in the next sampling round (first quarter 2009) MTBE was detected at 19 ug/L. This shows that MTBE concentrations have fluctuated in this well in the past, therefore in absence of verification monitoring results, the most recent non-detect does not indicate that the plume is stable and decreasing.

Additionally, monitoring well MW13 is being used as the defining edge of the plume. The MTBE groundwater plume begins at some point between MW4 and MW3 and, with exception of the most recent sampling round, extends past MW13. This would make the plume over 1,000 feet long. None of the low-risk case closure scenarios allow for closure with a plume over 1,000 feet long. Scenario 4 does allow for low-risk closure with a plume length of less than 1,000 feet long. So, the case can only meet this criterion based on the most recent groundwater sampling data and if the assumption is made that MW13 would remain non-detect for MTBE in the future. If these assumptions are made then the length of the plume could be calculated as somewhere between 600 and 1,000 feet in length and would meet the plume length criterion for Scenario 4.

Zone 7 does not agree that there is enough data to support that the plume has stabilized at less than 1,000 feet in length given the uncertainty of monitoring well MW13's results remaining non-detect.

Furthermore, there is an active municipal supply well directly downgradient from the plume. If MW13 is outside the plume, as is the case for the First Quarter 2013, then this supply well is over 1,000 feet from the plume and the case would qualify for low-risk closure under Scenario 4. If MTBE is once again detected in MW13, as it has been in the past following a round of non-detect, it would be within 1,000 feet of the active downgradient municipal supply well, depending on how far the plume extends beyond MW13. This would be a third criterion that the case would fail to meet for low-risk closure under Scenario 4. Therefore, closing the case based on one round of data seems unreasonable.

We feel that case closure is premature and could put the public's water supply at risk. We recommend that the case remain open and that additional groundwater sampling be conducted to verify that the plume is truly stable and decreasing and meets the length criterion for Scenario 4.

We appreciate the opportunity to comment on this proposed case closure. If you have any questions or comments, please feel free to contact me at 925-454-5063 or via e-mail at cwiney@zone7water.com.

Sincerely,

Colleen Winey
Assistant Geologist - Groundwater Section
Zone 7 Water Agency

cc: Matt Katen, Zone 7
Jill Duerig, Zone 7