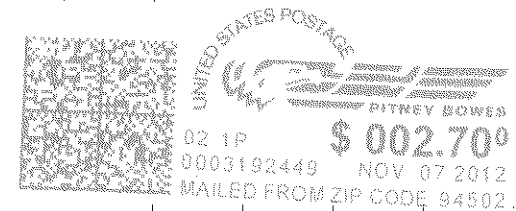


Alameda County CC4530
Environmental Health
1131 Harbor Bay Parkway, Rm.250
Alameda, CA 94502-6577



SUNC601* 900258882 1911 04 11/15/12
FORWARD TIME EXP RTN TO SEND
:SUNCOR HOLDINGS LLC
525 COLORADO AVE
SANTA MONICA CA 90401-2407

RETURN TO SENDER



Suncor Holdings Corp
Att: Keith Marks
11601 Wilshire Blvd #700
Los Angeles, A 90025

D. Roe

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

ALEX BRISCOE, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

November 5, 2012

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor (95814)
P.O. Box 100
Sacramento, CA 95812-0100
(Sent via E-mail to: commentletters@waterboards.ca.gov)

Subject: **Comment Letter - BP 11133 Case Closure Summary**, Revised Notice of Opportunity for Public Comment; Underground Storage Tank Cleanup Fund Case Closure Recommendation; Claim Number 5502; Fuel Leak Case No. RO0000403; Global ID # T0600100210; BP #11133, 2220 98th Avenue, Oakland, CA 94603

Dear Ms. Townsend:

Alameda County Environmental Health (ACEH) staff has received the *Notice of Opportunity for Public Comment* dated August 31, 2012, and the *Revised Notice of Opportunity for Public Comment*, dated September 10, 2012, signed by Lisa Babcock, Fund Manager of the Underground Storage Tank Cleanup Fund (USTCF or Fund). The purpose of these notifications is to inform interested parties of 1) the USTCF's intent to recommend closure of the subject site to the California State Water Resources Control Board (SWRCB) at a future Board meeting, and 2) the sixty day public comment period on the Fund's *UST Case Closure Summary*, dated August 31, 2012, signed by Lisa Babcock. According to the *Revised Notice of Opportunity for Public Comment*, written comments to the SWRCB on the Fund's *UST Case Closure Summary* must be received by 12:00 noon on November 5, 2012. This letter herein transmits ACEH's comments.

Requirements for Investigation and Cleanup of Unauthorized Releases from USTs

ACEH reviewed the USTCF's *UST Case Closure Summary*, including *Attachment 1: Compliance with State Water Board Policies and State Law* (i.e., the SWRCB's Low-Threat UST Case Closure Policy Paper Check List), and *Attachment 2: Summary of Basic Site Information (Conceptual Site Model)* in conjunction with the case files for the above-referenced site. A complete record of the case files (i.e., regulatory directives and correspondence, reports, data submitted in electronic deliverable format, etc.) can be obtained through review of both the SWRCB's Geotracker database, and the ACEH website at <http://www.acgov.org/aceh/index.htm>.

ACEH additionally reviewed the requirements for investigation and cleanup of unauthorized releases from USTs contained in the following resolutions, policies, codes, and regulations:

- SWRCB Draft Resolution 2012-xx, *Additional Actions to Improve the UST Cleanup Program*, to be considered for adoption by the SWRCB at their November 6th, 2012 meeting;
- SWRCB Draft *Plan for Implementation of Low-Threat UST Case Closure Policy and Additional Program Improvements*, to be considered for adoption by the SWRCB at their November 6th, 2012 meeting;
- SWRCB Resolution 2012-0016, *Approve a Substitute Environmental Document and Adopt a Proposed Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closure*, adopted on May 1, 2012; and effective August 17, 2012;