

**From:** [Mary Rose Cassa](#)  
**To:** [George Lockwood](#)  
**Cc:** [Levi Ariu, Env. Health](#); [Drogos, Donna, Env. Health](#); [Ben R. Wright](#); [Chuck Headlee](#); [Kevin Graves](#); [Stephen Hill](#); [frank goldman](#)  
**Subject:** Re: RO382 - Petition - letter from SWRCB - - Bill Chun  
**Date:** Tuesday, October 06, 2009 12:53:30 PM

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George,

It's our view that a large, substantial source still remains, and this source should be addressed. We apply the low-risk closure guidelines, which stress that sites should be left to natural attenuation processes as a remedial action only after a complete site characterization and adequate source removal.

I think it might be beneficial for us (State Board staff and RB2 staff) to schedule a meeting to further explore our mutual approaches to case closure, including how we determine "acceptable time frame" on a case-by-case basis.

Mary Rose

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State furlough 1st, 2nd, and 3rd Fridays of the month August 1, 2009-June 30, 2010

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Mary Rose Cassa, PG  
Senior Engineering Geologist  
Toxics Cleanup Division  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612  
510-622-2447

>>> George Lockwood 9/29/2009 8:15 AM >>>  
Mary Rose,

I see that the Regional Board has determined that "Several elements for low-risk closure appear to exist (the site is characterized, the dissolve plume appears to be stable or decreasing, no sensitive receptors, no risk to human health or the environment)." I understand those determinations.

I'm confused and want to fully understand the Regional Board Response on one last determination. If I may paraphrase, the Regional Board indicated that the time frame to complete the biodegradation process before the resource is to be used was unacceptable. Since the City of Alameda sits on top of this site with sewers, storm drains, roads, lawns, and other contaminant sources, are these waste generators going stop and their degradation/pollution and clean it up in the foreseeable future?

I am curious, the Regional Board must have determined what a reasonable time frame to reach WQOs would be. Can the Regional Board share that determination with me?

George

George W. Lockwood, MSCE, PE-Civil #59556  
Chief, UST Cleanup Unit 15-17  
State Water Resources Control Board  
Division of Water Quality  
1001 "I" Street  
PO Box 2231  
Sacramento, CA 95812

Email: [glockwood@waterboards.ca.gov](mailto:glockwood@waterboards.ca.gov)

Web: <http://www.waterboards.ca.gov/ust/cleanup/index.html>

(916) 341-5752 Desk  
(916) 341-5808 Fax

>>> Mary Rose Cassa 9/28/2009 10:04 AM >>>  
Rb2 comments attached.

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State furlough 1st, 2nd, and 3rd Fridays of the month August 1, 2009-June 30, 2010  
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>>> George Lockwood 9/2/2009 3:04 PM >>>  
Mary Rose,

FYI

>>> Mary Rose Cassa 8/31/2009 2:35 PM >>>  
George,

I'd appreciate receiving copies of the documents Donna has requested.

mary Rose

>>> "Drogos, Donna, Env. Health" <donna.drogos@acgov.org> 8/31/2009 1:52 PM >>>  
George,

On 08/26/09 ACEH received a letter from you regarding a petition for case closure for RO382, Bill Chun Service Station. The letter requires ACEH to submit documents with 10 or 12 days "of the date of this letter," however your letter is undated. Please clarify the date of this letter so that response timeframes can be determined.

Additionally, your letter requests that we prepare a response to the petition you received however, a copy of the petition was not included with the letter. Also, the letter indicates an unidentified "Enclosure" is included with the letter, however no enclosure was included with the original letter sent to the Health Care Agency Director (ACEH's cc: copy was w/o enclosure). Please provide us with a copy of the petition and the enclosure that was included with the letter.

Lastly, your letter is addressed to the Director of the Health Care Agency for the entire County of Alameda (hospitals, MediCal, welfare, etc.) rather than the Director of Environmental Health (ACEH, the department with the LOP contract) and sent to an address different from Environmental Health. Can you adjust your department contact for petitions to Ariu Levi, Director Environmental Health at ACEH? This will ensure that correspondence & attachments requiring response from ACEH is received by us directly and without delays in mail forwarding.

Thanks, Donna

Donna L. Drogos, PE  
LOP Program Manager

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502

510-567-6721

donna.drogos@acgov.org<BLOCKED::blocked::mailto:donna.drogos@acgov.org>

Online case files are available at the website below

<http://www.acgov.org/aceh/index.htm><blocked::blocked::http://www.acgov.org/aceh/index.htm>

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