RECEIVED
OCT 20 2011
Division of Water Quality

Draft Comments on California State Water Resources Control Board Low-Threat UST Closure Policy CEQA Scoping Document of September 21, 2011

Mike Vivas, P.E.

**Comment 1) The checklist of environmental factors potentially impacted in Section VI Environmental Impacts of the Scoping Document should include a check in the box for Hydrology/Water Quality.**

The draft policy allows groundwater contaminated with petroleum at concentrations that exceed WQOs, drinking water standards, or other health based standards to stay in place while naturally attenuating. Depending on hydro geologic conditions and local well pumping action, contaminated groundwater may continue to move in the aquifer. This movement may cause the spread of contaminated water horizontally beyond the identified plume boundaries and vertically to deeper aquifers causing potentially significant impacts. Contaminated water can move through production drinking water wells, industrial water wells, and agricultural wells located in the plume area when they are not pumping. For example standby wells and active production wells when not pumping, during periods of low demand, if these wells are constructed with multiple well screens or screens that intersect multiple aquifers.

**Comment 2) In Section VI-9 Hydrology/Water Quality items a) and f) should include a check in the box for Potentially Significant or Less than Significant With Mitigation Incorporated.**

See Comment 1 above.

**Mitigation of potential impacts to water quality from cross contamination though wells when they are not pumping:**

Add to the policy the requirement for identifying all wells both active and inactive located within the plume area where residual contamination is to be left in place. Conduct an assessment of the potential for each identified well to act as a conduit for cross contamination of aquifers when not pumping.

This assessment should include reviewing all available administrative and operating data for the well including, but not limited to the Driller Reports, permits for drilling and operating the well and well performance and maintenance data.

To support the assessment the location for each identified well should be verified in the field and each well inspected. Specific data should be obtained and recorded for each existing well to support the assessment. The specific data should include, but not be limited to: the geographical coordinates (Lat/Lon and elevation using sub meter accuracy Geographic Positioning System (GPS) technology); physical description of the well as built; environmental logs; current static water level in the well; chemical sampling for constituents of concern at discrete intervals in the well; and in well flow direction and velocity under non pumping conditions.

The assessment should be completed based on the data obtained and include conclusions and recommendations for further action if warranted.