



Humboldt County Department of Health and Human Services Division of Environmental Health

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July 29, 2011

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-2000
(via email)

**Subject: Comment Letter- Tipple Motors, Inc., Jack Tipple (Petitioner)
524 Main St., Ferndale, California LOP # 12052**

Dear Ms. Townsend:

We received the document *Notice Of Opportunity for Public Comment, Tipple Motors*, prepared by State Water Board. Humboldt County LOP presented three main points of objection to case closure during a conference call, a Site Conceptual Model meeting. Yet, the points are not a part of the subject document. There are also several correspondences from our office (see June 2008, September 2008, and February 2009) that provide site specific details to further support these three points. We recommend revising the subject document to include these points.

For the record, our points are:

- 1) Remediation at this site did not occur to the extent practicable;
- 2) The trendline presented is inaccurate; and
- 3) There is a negligible influence from biodegradation at this site.

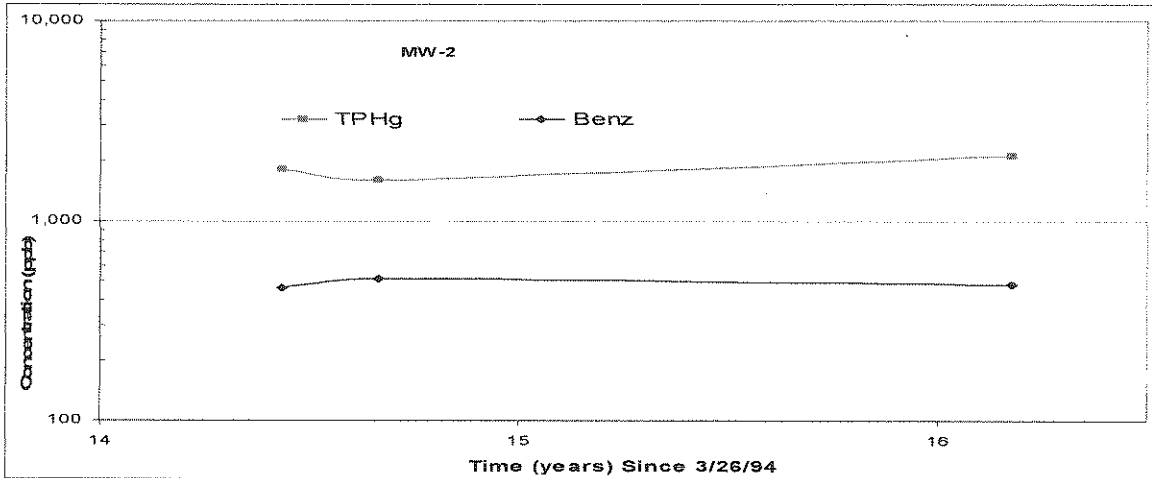
Remediation did not occur to the extent practicable. The vacuum extraction system terminated operation July 2008. Rate of recovery at the time of shutdown was high enough to justify continued operation. The extraction points installed inside the building were effective. There was additional mass that could have been removed effectively. There were other areas of high concentration in soil where extraction points could have been installed.

Previously, we did not concur with the interpretation *the remediation system removed the majority of petroleum hydrocarbon impact* and we did not concur with the interpretation *the vacuum extraction system had reached its feasible limit* (see Sept. 20, 2008 and Feb. 20, 2009).

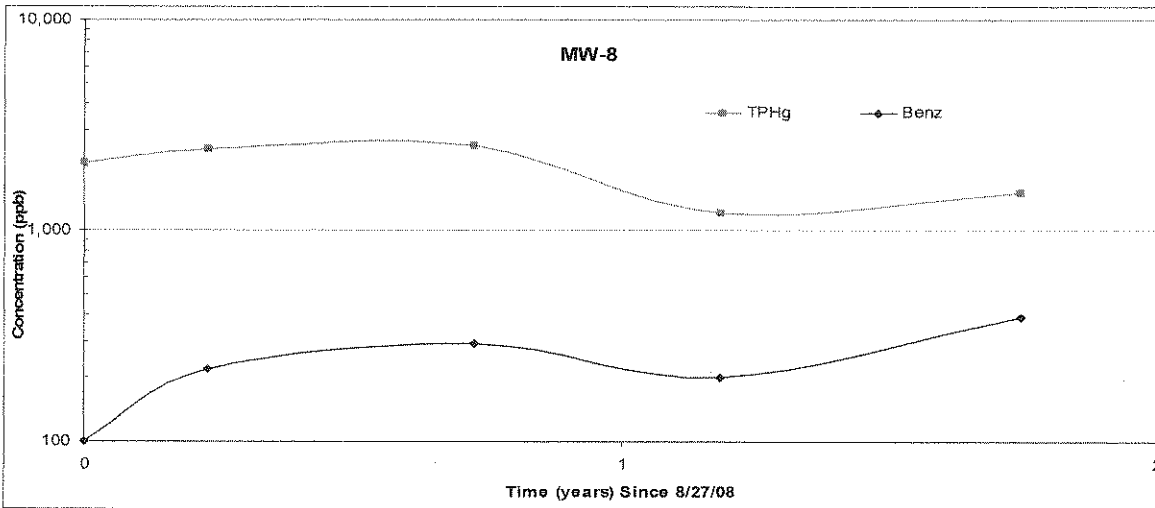
The system was not a high vacuum dual phase extraction system (HVDPE) as reported in the subject document. Removal of water was not a part of this remediation system. Vacuum pressure was relatively low.

The trendline presented is inaccurate. Because significant mass removal occurred, it is inaccurate to place trendlines through plots of concentration versus time for the entire period of investigation. In order to estimate rate of degradation of remaining mass, the data collected after shutdown is pertinent.

There is a negligible influence from biodegradation at this site. The rate of degradation of what is remaining is evaluated by results of water samples collected after shutdown of the remediation system. Based on the measured concentrations since shutdown, and the long term trend, biodegradation has a negligible influence at this site. The graphs below present measured concentrations of TPHg and benzene at selected locations, after shutdown.



Graph One. TPHg and benzene at MW-2, after shutdown



Graph Two. TPHg and benzene at MW-8, after shutdown

We respectfully request that you revise the subject document to reflect the information that has been presented in its totality. Please call Mark Verhey at 707-268-2208 if you have any questions.

Sincerely,

Larry Lancaster, Supervising REHS
Hazardous Materials Unit

Mark Verhey, Professional Geologist 6,729
Local Oversight Program

cc: Russell Hansen, UST Technical Unit
12052.046/158L