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March 13, 2012

Mr. Charles R. Hoppin, Chairman
State Water Resources Control Board
P.O. Box 100
Sacramento, California 98512-0100

RE: Draft Low-Threat Underground Storage Tank Case Closure Policy

Dear Mr. Hoppin,

I have reviewed the Draft Low-Threat Underground Storage Tank Case Closure Policy (Policy) dated January 31, 2012. I have also reviewed many of the comments regarding the Policy with regards to its pros and cons. Many of the Policy issues have been extensively researched by many in the environmental industry. My additional concerns are how this Policy will affect our already limited sources for drinking water. How the Policy will provide a better alternative to what is in place today to protect and conserve our water source, and how it will do so without increasing the stress on this resource.

I am respectfully requesting further explanation on the following concerns:

- How does adopting a Policy allowing less stringent cleanup goals lower the concentrations of petroleum hydrocarbons in groundwater and how does this relieve stress on a water source that is already limited?

- The Policy does not discuss the pressures of our current state population on our increasingly limited water supply. Population growth is inevitable in California and the Policy does not take into account future population growth and additional needs for more clean water. The Southern California region already over-allocates the amounts of water reserved for use at its present population. Please explain how the Policy will **not** further limit our water supply by allowing increased concentrations of petroleum hydrocarbons to remain in soil and groundwater beneath former UST sites. Please explain how this Policy will help to relieve the stress of the current population on our currently limited water supply. Please also explain how this Policy addresses future increased populations and increased stress on the same water supply.

- Leaving petroleum hydrocarbons in soil or groundwater in an area that is currently not within a groundwater basin with designated beneficial uses does not mean that local agencies and local populations will not require access to those resources in the future. Please explain how **not** properly identifying and removing/remediating these contaminants to the maximum extent practicable will ensure a clean water source for future generations should those resources be necessary for future irrigation and should those areas be used as a future recharge basin.

Sincerely,

Sawyer Jones
Environmental Scientist
FREY Environmental, Inc.