



# ENVIRONMENTAL HEALTH

## AMADOR COUNTY LAND USE AGENCY

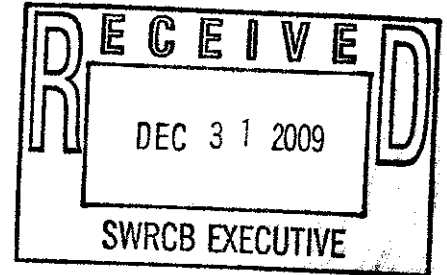
Telephone: (209) 223-6439  
Fax: (209) 223-6228  
Website: www.co.amador.ca.us  
E-mail: ACEH@co.amador.ca.us

County Administration Center • 810 Court Street • Jackson, CA 95642-2132

December 28, 2009

1/19/10 Bd Mtg.  
UST Case Closure (#15471)  
Deadline: 12/31/09 by 12 noon

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor [95814]  
P.O. Box 100  
Sacramento, CA 95812-0100



RE: Case Closure Recommendation - Ione Cardlock, 116 Main Street, Ione; UST Cleanup Fund Claim Number 15471

Dear Ms. Townsend,

Amador County Unified Program would like to comment on the Draft UST Case Closure Summary prepared by the UST Cleanup Fund staff in support of the recommendation for case closure by the UST Cleanup Fund Manager. The summary states that the Amador County Environmental Health Department has the regulatory responsibility to supervise the proper abandonment of monitoring wells. Amador County Environmental Health Department permits and supervises the construction and destruction of wells in Amador County. Amador County does not require the destruction of out of service wells that are maintained in a manner that is protective of water quality.

In view of the presence of an undefined volume and magnitude of impacted soil in the vadose zone, the ability to monitor groundwater quality in future may be of value. If it is the intent of the State Water Resources Control Board to destroy all monitoring wells associated with Claim Number 15471, the wells should be included in the closure requirements for the site. Well destruction has traditionally been considered part of site corrective action and reimbursable by the UST Cleanup Fund.

This site has several offsite wells located on adjacent properties not owned or under the control of the responsible party. If the offsite wells are not destroyed by the responsible party as part of the site closure, the property owners will be responsible for the maintenance or destruction of the wells after the issuance of a No Further Action letter. It does not seem reasonable for an adjacent property owner, whose involvement in the site mitigation activity is solely due to the location of their property, to bear the cost of well destruction.

It is appropriate for the site closure conditions to include the destruction of all monitoring wells and to include the well destructions as a reimbursable cost for the UST Cleanup Fund. Please call me at (209) 223- 6439 if you have any questions.

Very truly yours,

  
Robert Fourt, REHS

UST/UST Cleanup Fund/site closures