



# REMEDIATION TESTING AND DESIGN, INC.

*Environmental Investigation Remediation Natural Attenuation Closure*

*A California Corporation*

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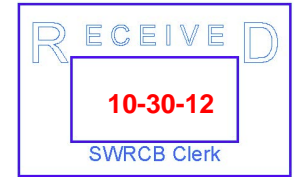
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October 30, 2012



State Water Resources Control Board  
c/o Jeanine Townsend  
Clerk to the Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**SUBJECT** Comment re: Delegation of Authority to the Executive Director for Certain  
Underground Storage Tank Site Closures

Dear Chair and Board Members:

Remediation Testing and Design, Inc. (RTD) is pleased to submit comments on the Draft Resolution for the Delegation of Authority to the Executive Director for Certain Underground Storage Tank Site Closures prepared by staff of the State Water Resources Control Board (SWRCB)

## **EXECUTIVE UST CLOSURE AUTHORITY**

RTD agrees with the proposed resolution granting authority to the Executive Director to close UST sites that meet or exceed the required criteria of the Low-Threat Closure Policy.

- 1) We recommend that this resolution also grant the Executive Director the authority to approve cleanup plans submitted by dischargers and rejected by local regulators that are designed to meet or exceed the criteria of the Low-Threat Closure Policy.
- 2) We recommend that for approving closure or cleanup plans, the Executive Director can only delegate this authority to staff who are Professional Engineers or Geologists in good standing.

## **CONCLUSIONS AND RECOMMENDATIONS**

The draft Delegation of Authority is a much needed improvement for helping to focus UST site closure. .

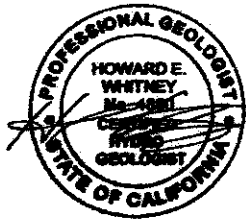
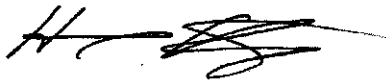
We recommend some focused fine tuning of this draft Resolution to include the authority to review cleanup plan and to ensure that any delegation to staff by the Executive Director is limited to appropriately licensed and experienced professionals.

**REMARKS**

The signature and stamp below of the registered professional attests, under penalty of perjury, that this report is true and accurate to the best of my ability given the standard industry practices currently employed. Please call (831) 458-1612 with any questions or comments.

Sincerely,

**REMEDATION TESTING AND DESIGN, INC.**



Howard E. Whitney, #PG 4860, #CHG 193

Professional Geologist, Certified Hydrogeologist