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Division of Water Quality

November 1, 2011

Jennifer Scholte
State Water Resources Control Board
1001 I Street, 15th Floor, Sacramento, CA 95814

Re: Comments to Low-Threat UST Closure Scoping Document

Dear Ms. Scholte:

In response to the Low Threat Closure Scoping document, Land Science Technologies (LST), a division of Regenes Inc., has the following comment:

With respect to the bio-attenuation zones defined in Appendices 3 and 4, specifications of dissolved O₂ concentrations greater than 4% in vadose zone soils are designated for sites with existing buildings as well as vacant sites with future construction planned. It is unrealistic to assume that concentrations greater of O₂ greater than 4% will be maintained once the vacant property is developed. Placement of overlying building structures, future hardscaping of surfaces (i.e., asphalt, concrete parking cover, sidewalks), will most certainly decrease the O₂ in the proposed bioattenuation zone following development. Subsequently, we recommend not applying this Low-Threat Closure policy to undeveloped properties.

Please do not hesitate to contact us should you need clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Grant", written over a light blue horizontal line.

Peter Grant
Division Manager
Land Science Technologies.

A handwritten signature in black ink, appearing to read "Suzi Rosen", written over a light blue horizontal line.

Suzi Rosen, P.G.
Southwest District Manager
Regenes Inc.