

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ORDER NO. 93-087

AMENDING ORDER NO. 92-041, SITE CLEANUP REQUIREMENTS FOR:

REDDING PETROLEUM, INC.; GEORGE E. REDDING and RUTH T. REDDING;
PHILLIPS PETROLEUM COMPANY; WENWEST, INC.; and SUSAN MAY ROSE
1551 MONUMENT BOULEVARD
CONCORD, CONTRA COSTA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region
(hereinafter Regional Board) finds that:

1. On April 15, 1992, the Regional Board adopted Order No. 92-041, prescribing site cleanup requirements for Redding Petroleum, Inc.; George E. Redding and Ruth T. Redding; Phillips Petroleum Company; Wendy's International, Inc.; Wenwest, Inc.; and Susan May Rose.
2. Wenwest, Inc., Susan Rose, Wendy's International, Inc., and Phillips Petroleum Company petitioned the State Water Resources Control Board (hereinafter State Board) for review of Order No. 92-041.
3. On October 22, 1992 the State Board adopted Order No. WQ 92-13, which required that Order No. 92-041 "be amended to remove Wendy's International, Inc. from the list of dischargers and to state that Wenwest, Inc, and Susan Rose are only to be held responsible for the performance of the listed tasks in the event that Redding and Phillips fail to fulfill their obligations."
4. On February 18, 1993, Redding Petroleum, Inc., George E. Redding and Ruth T. Redding (hereinafter Redding) submitted to the Regional Board a request that, based on "previously unavailable information", the Regional and State Board Orders be modified to name both Wendy's International, Inc. and Wenwest, Inc. as primarily responsible parties.
5. Five documents were submitted by Redding as being "new" information. These documents were; (1) an undated form signed by George Redding giving Wendy's International, Inc. permission to apply for all necessary permits and licenses necessary to construct and operate its proposed restaurant on his property, (2) staff recommendations from a Planning Commission meeting dated March 28, 1984 regarding a Wendy's International, Inc. application for use permit, (3) a letter from the Contra Costa County Fire Department to the City of Concord Planning Department dated March 30, 1984 listing as conditions for approval of the development plan for the site that "Existing underground fuel tanks shall be removed

prior to construction. (79.113)UFC" and "Necessary permits shall be obtained from this office prior to removal. (4.101)UFC", (4) a Use Permit issued to Wendy's International, Inc. on April 11, 1984, and (5) a building permit from the City of Concord dated November 21, 1984, giving Wendy's International, Inc. permission to "demolish existing gas station".

6. Redding contends that these five documents prove that "Wendy's and/or Wenwest, by their conduct related to the removal of the tanks and construction of the restaurant, caused materials to be deposited where they created a condition of pollution or nuisance". Redding further contends that "by their disregard for and violation of underground tank closure laws and regulations, Wendy's and Wenwest exacerbated the problems at the subject site so as to greatly increase the complexity and the costs of any required clean-up."
7. The information listed in Findings 5 through 7 above either was or could have been obtained by Redding and presented to the Regional Board and/or to the State Board during its review of the Regional Board Order. Thus, the submittal does not constitute "new evidence."
8. Even if Redding's submittal constituted new evidence, upon detailed review of the submittal, and in light of the list of considerations which lead to the State Board decision, this Board finds that no substantial evidence has been presented to indicate that Wendy's International, Inc. should be a discharger, in that Wendy's International did not cause the discharge to occur, nor did they engage in activities on the site that may have exacerbated the problem. In addition, no substantial evidence has been presented to indicate that Wenwest, Inc. or Susan Rose should be primary dischargers in that they did not cause or permit the activity which led to the discharge.
9. Therefore, in accordance with State Board Order No. WQ 92-13, the Regional Board finds that, for the purposes of this Order, Redding Petroleum, Inc., George E. and Ruth T. Redding, Phillips Petroleum Company, Wenwest, Inc., and Susan Rose are hereinafter "Dischargers". Redding Petroleum, Inc., George E. and Ruth T. Redding, and Phillips Petroleum Company are primarily responsible for this discharge and are hereinafter "Redding and Phillips". Wenwest, Inc., and Susan Rose are secondarily responsible for this discharge, and are hereinafter called the Secondarily Responsible Dischargers. The Secondarily Responsible Dischargers are to be held responsible for the performance of the listed tasks in the event that Redding and Phillips fail to fulfill their obligations.
10. PROVISION C.2.a of Order No. 92-041 required the submittal, by July 1, 1992, of an acceptable technical report containing a proposal to define the horizontal and vertical extent of soil and groundwater pollution (Site Characterization Workplan). A draft workplan was received on July 1, 1992. An addendum was received on August

- 5, 1992, and the workplan was approved by the Executive Officer on August 11, 1992.
11. PROVISION C.2.b of Order No. 92-041 required the submittal, by November 18, 1992, of an acceptable technical report documenting completion of the necessary tasks identified in the Site Characterization Workplan (Site Characterization Report). The report received on November 18, 1992 was found to be unacceptable to the Executive Officer. A new Site Characterization Report was submitted on June 14, 1993, and is currently being reviewed by staff.
 12. PROVISION C.2.c of Order No. 92-041 required the submittal, by November 18, 1992, of an acceptable technical report containing an evaluation of interim remedial alternatives, a recommended plan for interim remediation, and an implementation time schedule (Interim Remedial Action Plan). The report received on November 18, 1992 was found to be unacceptable to the Executive Officer. A new Interim Remedial Action Plan was received on March 17, 1993, and was approved by the Executive Officer on June 14, 1993.
 13. PROVISION C.2.d of Order No. 92-041 required the submittal, by March 18, 1993, of an acceptable technical report documenting completion of the necessary tasks to initiate the proposed Interim Remedial Actions. In March, 1993 the Regional Board was notified that floating product monitoring and removal, as proposed in the Interim Remedial Action Plan, was being initiated. This Order includes new provisions for documenting initiation of additional proposed Interim Remedial Actions.
 14. This action is an Order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of the Resources Agency Guidelines.
 15. The Board has notified the Dischargers and interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.
 16. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code and regulations adopted thereunder, that the dischargers, their successors and assigns, shall comply with the following:

Prohibitions

PROHIBITIONS A.1., A.2., and A.3. remain unchanged.

Specifications

SPECIFICATION B.1. remains unchanged.

SPECIFICATIONS B.2. through B.5. are renumbered B.3. through B.6., and a new SPECIFICATION B.2. is inserted and reads as follows:

2. The last sentence in Finding 2 of Order No. 92-041 is deleted and the following is added:
Redding Petroleum, Inc., George E. and Ruth T. Redding, Phillips Petroleum Company, Wenwest, Inc., and Susan Rose are hereinafter Dischargers. Redding Petroleum, Inc., George E. and Ruth T. Redding, and Phillips Petroleum Company are primarily responsible for this discharge and are hereinafter "Redding and Phillips". Redding and Phillips are responsible for compliance with all Prohibitions, Specifications and Provisions of this Order, the Self-Monitoring Program, and their subsequent amendments. Wenwest, Inc., and Susan Rose are secondarily responsible for this discharge, and are hereinafter "Secondarily Responsible Dischargers". The Secondarily Responsible Dischargers are to be held responsible for compliance with the Prohibitions, Specifications and Provisions of this Order, the Self-Monitoring Program, and their subsequent amendments, only in the event that Redding and Phillips fail to fulfill their obligations.

SPECIFICATION B.7. is added and reads as follows:

7. Pursuant to Section 13304 of the Water Code, the Dischargers are hereby notified that the Regional Board is entitled to, and may, seek reimbursement for all reasonable costs actually incurred by the Regional Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. Upon receipt of a billing statement for such costs Redding and Phillips shall reimburse the Board. The Secondarily Responsible Dischargers will be held responsible for such oversight costs only in the event that Redding and Phillips fail to fulfill their obligations.

Provisions

PROVISION C.1. remains unchanged.

PROVISION C.2. is revised to read as follows:

2. Redding and Phillips shall comply with all Prohibitions, Specifications and Provisions of this Order and the Self-Monitoring Program, and shall meet the following compliance task and time schedule. Within sixty (60) days of the Executive Officer's determination and actual notice to the Secondarily Responsible Dischargers that Redding and Phillips have failed to comply with this Order, the Secondarily Responsible Dischargers shall themselves then be responsible for complying with this Order under a time schedule revised by the Executive Officer to reflect the status of the cleanup at the time of default.

PROVISION C.2.a., C.2.b. and C.2.c. are unchanged.

PROVISIONS C.2.c.(1) is added as follows:

(1) COMPLIANCE DATE: November 30, 1993

TASK: Submit a technical report acceptable to the Executive Officer, documenting completion of tasks necessary to implement the interim remedial activities proposed in the workplan submitted for PROVISION C.2.c. as approved by the Executive Officer. This report shall include, but will not be limited to, documentation of:

1. installation of all proposed ground water and vapor extraction wells, pumps, conveyance and treatment systems;
2. unexpected or unusual conditions encountered during the installation;
3. any soil removal; and
4. any variations from, or modifications to the approved workplan or time schedule determined technically necessary.

Existing PROVISION C.2.d. is deleted and the following PROVISIONS C.2.d. and C.2.d.(1) are added:

d. COMPLIANCE DATE: March 31, 1994

TASK: Submit a technical report, acceptable to the Executive Officer which evaluates the effectiveness of all interim remedial actions taken in achieving the interim goals defined in Finding 14 of Order No. 92-041. If the original interim remedial action alternatives being

implemented are not proving to be effective in achieving the interim goals defined in Finding 14 of Order No. 92-041, then this report shall include a SUPPLEMENTAL workplan for specific modifications to, or an alternative to, the original interim remedial system, and an implementation time schedule.

- (1) **COMPLIANCE DATE:** Within 90 days of executive officer approval of the supplemental workplan submitted for PROVISION 2.d:

TASK: Submit a technical report acceptable to the Executive Officer, documenting completion of tasks necessary to implement the interim remedial activities proposed in the SUPPLEMENTAL workplan submitted for PROVISION C.2.d. This report shall include, but will not be limited to, documentation of:

1. installation of all proposed ground water and vapor extraction wells, pumps, conveyance and treatment systems;
2. unexpected or unusual conditions encountered during the installation;
3. any soil removal; and
4. any variations from, or modifications to the approved SUPPLEMENTAL workplan or time schedule determined technically necessary.

Existing PROVISION C.2.e. is deleted and the following PROVISION C.2.e. is added:

- e. **COMPLIANCE DATE:** October 31, 1994

TASK: Submit a technical report acceptable to the Executive Officer evaluating the effectiveness of all interim remedial actions in achieving the interim goals defined in Finding 14 of Order No. 92-041. This report shall include, but will not be limited to:

1. quantification of the amount, to date, of petroleum hydrocarbons removed from the soil and ground water by the interim remediation methods;
2. an estimation of the volume and extent of pollution remaining in the soil and groundwater;
3. the measured zone of influence, or capture zone, of ground water and vapor extraction wells;
4. a summary and interpretation of pertinent data collected; and

5. an explanation of how the collected data are being utilized in evaluating the effectiveness of the interim remedial actions and designing the final cleanup alternatives.

Existing PROVISION C.2.f. is deleted, and the following PROVISIONS C.2.f. and C.2.f.(1) are added:

f. **COMPLIANCE DATE: February 28, 1995**

TASK: Submit a technical report acceptable to Executive Officer containing a final remedial action plan and time schedule. Such report shall include, but will not be limited to:

1. a feasibility study developed in accordance with subsection (f) of Section 2725 (Underground Tank Regulations, Article 11) and PROVISION 3 of this Order, to evaluate the alternatives for final remediation;
2. cleanup objectives and levels to be attained and the rationale which shows these cleanup objectives and levels comply with (a) subsection (g) of Section 2725 (Underground Tank Regulations, Article 11), and (b) the Basin Plan;
3. the recommended measures necessary to achieve final cleanup levels and objectives;
4. a proposal for treatment and/or disposal of all extracted vapor, ground water and soil;
5. a workplan and implementation time schedule for the proposed final remediation alternatives, including an estimation of the time needed to complete all remediation; and
6. a proposed monitoring and project review plan.

(1) **COMPLIANCE DATE: Within 180 days of executive officer approval of the final remedial action plan submitted for PROVISION C.2.f:**

TASK: Submit a technical report acceptable to the Executive Officer, documenting completion of tasks necessary to implement the selected final remediation activities proposed in the workplan submitted for PROVISION C.2.f. This report shall include, but will not be limited to, documentation of:

1. installation of all proposed ground water and vapor extraction wells, pumps, conveyance and treatment systems;
2. unexpected or unusual conditions encountered during the installation;

3. any soil removal; and
4. any variations from, or modifications to the approved remediation workplan or time schedule determined technically necessary.

PROVISION C.2.g. is deleted.

PROVISION C.3. is revised as follows:

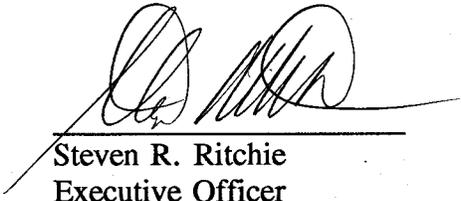
3. The submittal of technical reports evaluating all interim and final remedial measures will include a projection of the cost, effectiveness, benefits and impact on public health and welfare, and the environment, of each alternative measure. The reports shall be consistent with the guidance provided by:
 - a. Section 25356.1 of the California Health and Safety Code;
 - b. State Water Resources Control Board's Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality Waters in California."
 - c. Section 2725 of the Underground Storage Tank Regulations Corrective Action Requirements (CCR 2725); and the
 - d. Basin Plan for the San Francisco Bay Region.

PROVISIONS 4, 5, 6, 7, 8 are unchanged.

PROVISION 9 is added and reads as follows:

9. Pursuant to California Water Code Sections 13304, 13305, 13350, 13385, 13386, and 13387, if the Dischargers fail to comply with the provisions of Order No. 92-041, or this Order, or any subsequent amendments, the Executive Officer may request the Attorney General to take appropriate enforcement action against the Dischargers, including injunctive relief; or the Board may schedule a hearing to consider requesting the Attorney General to take appropriate enforcement action against the Dischargers, including injunctive and civil monetary remedies; or the Board may schedule a hearing to administratively impose civil liability not to exceed five thousand dollars (\$5,000) for each day this Order is violated.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on July 21, 1993.



Steven R. Ritchie
Executive Officer

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

REDDING PETROLEUM, INC.; GEORGE E. REDDING AND RUTH T. REDDING;
PHILLIPS PETROLEUM COMPANY;
WENWEST, INC.; and SUSAN MAY ROSE

1551 MONUMENT BOULEVARD
CONCORD, CONTRA COSTA COUNTY

TENTATIVE ORDER NO. 93-087

A. GENERAL

1. Reporting responsibilities of waste dischargers are specified in Sections 13225(a), 13267(b), 13268, 13383 and 13387(b) of the California Water Code and this Regional Board's Resolution No. 73-16.
2. The principal purposes of a waste discharger's monitoring program, also referred to as a self-monitoring program, are: 1) To document compliance with site cleanup requirements and prohibitions established by this Regional Board; 2) To facilitate self-policing by the waste dischargers in the prevention and abatement of pollution arising from waste discharge; 3) To develop or assist in the development of discharger prohibitions, regional and national standards of performance, and other standards; and 4) To prepare water and wastewater quality inventories.
3. The Dischargers shall permit the Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code:
 - a. Entry upon premises at which any pollution sources exist, or may potentially exist, or at which any required records are kept, which are relevant to the Order.
 - b. Access to copy any records required to be kept under the terms and conditions of the Order.
 - c. Inspection of any monitoring equipment or methodology implemented in response to the Order.
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the Dischargers.

B. SELF-MONITORING SAMPLING AND ANALYSIS REQUIREMENTS

1. Sampling and Analytical Methods
 - a. Sample collection, storage and analyses shall be performed according to the EPA Method 8000 series described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," revised November 1990, or other methods approved and specified by the Executive Officer of the Regional Board.
 - b. All water samples shall be analyzed by State certified laboratories using approved EPA methods for the type of analysis performed. All

laboratories shall maintain quality assurance/quality control records for Board review.

- c. All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurements.
- d. Groundwater samples shall be analyzed for total petroleum hydrocarbons as gasoline using modified EPA Method 8015 and sample preparation method 5030, and for aromatics using EPA Method 8020, or other methods approved by Regional Board's Executive Officer .

2. Description of Sampling Stations

Monitoring and extraction wells installed at the time of the adoption of this Self-Monitoring Program are shown in the attached Figure 1. All existing and future monitoring and extraction wells, and any other sampling stations specified, shall be monitored in accordance with the schedule in Section B.3 below.

3. Schedule of Sampling and Analysis

- a. Sampling and analysis of groundwater for all wells shall be conducted according to the attached Monitoring Schedule (Table 1). Groundwater elevation in each well shall be measured and recorded before each sampling event.
- b. Depths of all wells shall be determined on an annual basis and compared to the depth of the well as constructed. The results of this comparison shall be reported in the annual report specified in Section C.4. below.

C. SELF-MONITORING REPORTING REQUIREMENTS

1. Letter of Transmittal

- a. A letter transmitting self-monitoring reports shall accompany each report.
- b. This letter shall include a discussion of any violations which occurred during the reporting period and actions taken or planned for the purpose of correcting any requirement violation.
- c. Monitoring reports and the letter transmitting reports shall be signed by either a principal executive officer or a duly authorized employee (authorization must be on file at the Regional Board office).
- d. The letter shall contain the following certification:

"I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

2. Data Reporting Requirements

- a. Results from each required analysis and observation shall be submitted in the quarterly self-monitoring reports. Results for any additional chemical analyses performed by the Dischargers shall also be submitted.
- b. Soil data presented in all text, maps and tables should be reported in the following units:

	<u>preferred unit</u>	<u>acceptable unit</u>
TPH-g or -d	ppm	mg/kg
BTEX	ppb	µg/kg

Groundwater data presented in all text, maps and tables should be reported in the following units:

	<u>preferred unit</u>	<u>acceptable unit</u>
TPH-g or -d	ppb	µg/l, ml/l
BTEX	ppb	µg/l, ml/l

The unit chosen for each constituent must be used consistently throughout all reports.

- c. If a previously unreported compound or peak is detected in a sample from any well, a second sample shall be taken within a week after the results from the first sample are available. All chromatographic peaks detected in two consecutive samples shall be identified and quantified in the self-monitoring report.
- d. If floating petroleum product is observed during any monitoring event, the thickness of the floating layer will be measured using an oil/water interface probe or other suitable device, and reported to the nearest 0.01 foot. The occurrence of floating product or visible petroleum sheen at a station during a monitoring event will be noted on all data summary tables.
- e. Analytical procedures used for the required analyses shall be identified either directly in the report or by reference to a standard plan accepted

by the Executive Officer. Any special methods used for the required analyses shall be identified and shall have prior written approval of the Executive Officer. Any special methods necessary to comply with Section 2.c. above must be identified, but need not have prior written approval from the Executive Officer.

- f. Laboratory reports shall be copied as an appendix to the regular report. These reports shall include all laboratory quality assurance/quality control data and results, such as blanks, trip blanks, duplicates, etc.
- g. Original laboratory results shall be retained and shall be made available for inspection for at least six years after origination and until after all continuing or impending legal or administrative actions are resolved.

3. Quarterly Reports

Written technical reports shall be filed quarterly due one month after the end of each calendar quarter (by October 30, January 30, April 30, and July 30). The quarterly self-monitoring reports shall include, but will not be limited to:

- a. a detailed summary of work completed in the previous quarter, including construction data on new wells constructed, as well as work projected to be completed in the next quarter;
- b. appropriately scaled and labeled maps showing the location of all monitoring wells, extraction wells, utilities and existing structures;
- c. water quality data for all monitoring and extraction wells, including laboratory reports, as described in Section C.2. above;
- d. isoconcentration maps for TPH-g and Benzene in groundwater based on the current quarters analytical data (trends and inferences based on the isoconcentration maps shall be discussed);
- e. cross sections depicting subsurface geologic information and corresponding correlations based on boring data, with all assumptions and inferences stated and discussed;
- f. updated water table and piezometric surface maps for all affected water bearing zones for all onsite and offsite wells;
- g. groundwater extraction rates for all extraction wells;
- h. a cumulative tabulation of groundwater levels and analytical data for all on-site and off-site monitoring wells; and
- i. identification of potential problems which will cause or threaten to cause violation of the Order and what actions are being taken or planned to prevent these obstacles from resulting in violation of the Order.

4. Annual Reports

A summary report shall be filed annually and be due January 31 of each year. The annual report may be combined with the fourth-quarter Self-Monitoring Report described in Section C.3 above. The annual report shall include, but will not be limited to:

- a. a summary of the progress made toward compliance with the tasks and schedules of Provision C.2. of the Order for the past year and a projection of the progress to be made in the upcoming year;
- b. tabular and graphical summaries of data for each chemical present above detectable concentrations including minimum, maximum, median and average concentrations for the year, and summary iso-concentration maps showing any migration of each chemical over the year;
- c. cumulative water level data and a summary presentation of ground water flow direction over the year;
- d. cumulative data showing the volumes of TPH-g, BTEX and other chemicals of concern that have been removed through corrective action; and
- e. a comprehensive discussion of the compliance record during the previous year, and the corrective actions taken or planned which may be needed to bring the discharger into full compliance with this Order.

5. Distribution of Reports

- a. Copies of all reports, documents, and correspondence pertaining to compliance with the Prohibitions, Specifications, Provisions and Self-Monitoring Program of the Order shall be provided to the following agencies:
 - (1) Executive Officer
Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612
 - (2) Contra Costa County Health Services Department
Environmental Health Division
4333 Pacheco Boulevard
Martinez, CA 94553-2295
- b. It is requested that copies of Corrective Action Plans, Remedial Action Plans, Annual Self-Monitoring Reports, Site Characterization Reports

and Notices of Violation be sent to the following individuals and agencies:

- (1) City of Concord, Neighborhood Preservation Division
195 Parkside Drive, MS 26
Concord, CA 94519

I, Steven R. Ritchie, Regional Board Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

1. Has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in order to obtain data to determine compliance with Regional Board Order No. 93-087.
2. Is effective on the date shown below.
3. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the Dischargers and revisions will be ordered by the Executive Officer.



Steven R. Ritchie
Executive Officer

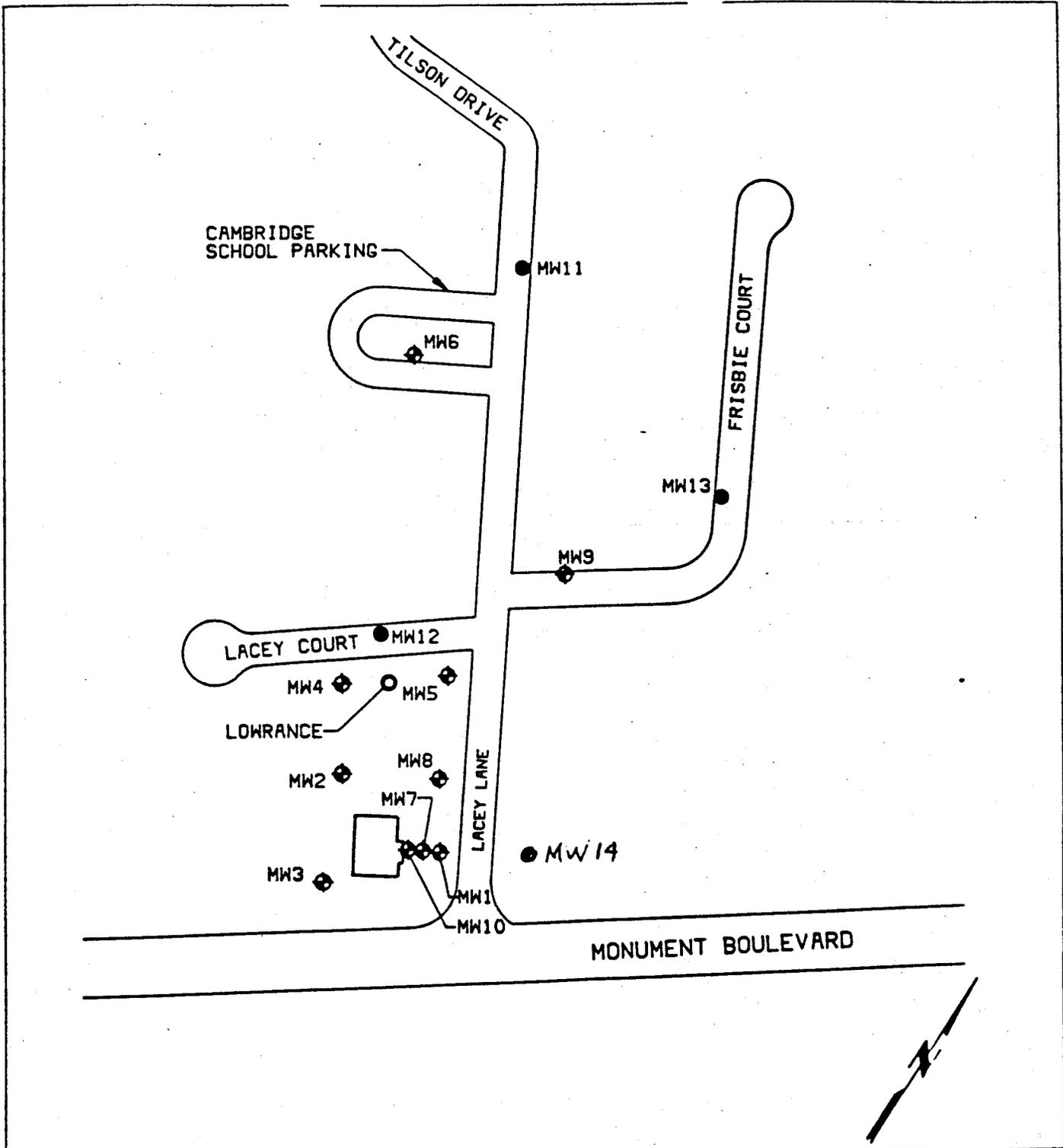
Effective Date: 7/21/93

Attachments: Table 1 — Monitoring Schedule for 1551 Monument Blvd.
Figure 1 — Facility and vicinity map including well locations

TABLE 1

MONITORING SCHEDULE FOR
1551 MONUMENT BLVD.

Sampling Station	Const. By (date)	Screened Interval (ft bgs)	ANALYSIS TO BE PERFORMED		
			Quarterly	Semi-Annually	Annually
SHALLOW ZONE					
MW1	D&M(1985)	13-23'	TPH-g, BTEX		
MW2	"	15-25'	TPH-g, BTEX		
MW3	"	10-20'	TPH-g, BTEX		
MW4	D&M(1990)	13.5-23.5	TPH-g, BTEX		
MW5	"	14-24'	TPH-g, BTEX		
MW6	"	12-22'	TPH-g, BTEX		
MW7	D&M(1991)	11(16?) -31'	DESTROYED SEPTEMBER 1992		
MW8	"	11(16?) -31'	TPH-g, BTEX		
MW9	"	14-24'	TPH-g, BTEX		
MW10	"	14-24'	TPH-g, BTEX		
MW11	B&V(1992)	12.5-32.5'	TPH-g, BTEX		
MW12	"	10-30'	TPH-g, BTEX		
MW13	"	10-30'	TPH-g, BTEX		
MW14	B&V(1993)	9-24'	TPH-g, BTEX		
Lowrance	unknown	unknown			TPH-g, BTEX
Future Wells	-	-	TPH-g, BTEX		
INTERMEDIATE ZONE					
DEEP ZONE					



LEGEND

Source: Base Map:
 Pacific Aerial Surveys
 No. AV-3845-18-11
 8-30-90

- ⊕ PREVIOUS MONITORING WELL
- NEW MONITORING WELL
- IRRIGATION WELL



**MONITORING WELL LOCATIONS
 1551 MONUMENT BOULEVARD
 CONCORD, CALIFORNIA**

FIGURE

DESIGNED JLD

APPROVED GRM

DATE NOV. 1992