CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 94-082

SITE CLEANUP REQUIREMENTS FOR:

SOUTHERN PACIFIC TRANSPORTATION COMPANY
PENINSULA CORRIDOR JOINT POWERS BOARD:
CITY AND COUNTY OF SAN FRANCISCO
SAN MATEO COUNTY TRANSIT AUTHORITY
SANTA CLARA COUNTY TRANSIT AUTHORITY

FOR THE PROPERTY AT: 1001 EL CAMINO REAL, BELMONT, SAN MATEO COUNTY

FINDINGS

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

1. **SITE DESCRIPTION**

   a. The site is located on 1001 El Camino Real, Belmont, San Mateo County, California (see Figure 1). The Southern Pacific Transportation Company (hereinafter, Southern Pacific) owned the property since the 1920s until 1994. The Peninsula Corridor Joint Powers Board, consisting of the City and County of San Francisco, the San Mateo County Transit Authority, and the Santa Clara County Transit Authority, purchased the property in 1994 for the Ralston Grade Separation Project.

   b. The property is located in a commercial area. The site is bounded to the north by railroad tracks, to the south by El Camino Real, to the west by Ralston Avenue, and to the east by Belmont Car Wash (1051 El Camino Real).

2. **SITE HISTORY**

   a. In 1986 four underground fuel tanks were tested at the facility. On February 18, 1986, it was discovered that Tank #3 had a leak rate of 2.16 gallon per hour and on March 8, 1986, Tank #4 had a leak rate of 1.77 gallon per hour. Riedel Environmental Services (RES) installed an observation well, OW-2. On March 6, 1986, Converse Environmental Consultant installed one well MW-1 (See Figure 2). The groundwater sample contained 100,000 ppb of gasoline and 10,000 ppb benzene.

b. On September 17, 1986, Southern Pacific removed the four underground fuel tanks. Upon removal, the tanks were inspected. Three of the four tanks had problems in the fill lines. Soil samples collected in the backfill material contained TPH-gasoline ranging from 240 to 12,900 ppm.

c. On December 11, 1986, groundwater samples collected from MW-1 and OW-2 had 507,000 and 573,000 ppb of TPH-gasoline, respectively.

d. In a letter dated June 23, 1989, San Mateo County Environmental Health Services Division identified Southern Pacific as a responsible party and requested a meeting to discuss the status of the site. On August 4, 1989, the County issued another letter due to lack of response. Southern Pacific phoned San Mateo County on August 11, 1989. In a follow up letter dated August 11, 1989, San Mateo County requested Southern Pacific to install monitoring wells and requested information with regard to soil remediation following the July 1986 tank removal. No reports were submitted.

e. Again, due to lack of response from Southern Pacific, San Mateo County issued another request on October 13, 1989. On December 21, 1989, Southern Pacific submitted a report dated February 5, 1987 to San Mateo County. Southern Pacific stated that the dissolved petroleum constituents in groundwater were solely attributable to the spill which had occurred at the Unocal station located on 699 Ralston Avenue. However, nine soil samples collected from the bottom of the tank pit showed TPH-gasoline concentrations ranging from 240 to 12,900 ppm. On December 28, 1989, San Mateo County again requested Southern Pacific to install monitoring wells at the site. On January 16, 1990, Southern Pacific responded that the spill from the former underground tanks at the site were minimal, the grab ground water samples were invalid, and that it should be UNOCAL's responsibility to further define the extent of contamination.

f. A meeting was held at San Mateo County on February 6, 1990. The morning session was attended by Regional Board staff, Southern Pacific, and Southern Pacific-Environmental Systems. In the afternoon session, Unocal representatives, as well as Mr. Richard Rosing, and Mr. Paul Goorjian Esq. (both representing Belmont Car Wash) joined the participants who attended the morning session. Southern Pacific stated that a Scoping Document would be submitted which would organize and summarize the information collected to date. Southern Pacific also intended to use the Scoping Document to present the argument that a subsurface investigation was not necessary.

g. The Scoping Document was submitted on April 19, 1990. After reviewing the Scoping Document, on July 10, 1990, San Mateo County staff informed Southern Pacific that a subsurface soil and groundwater investigation was still required. Southern Pacific responded in a lengthy letter dated August 10, 1990.

h. On August 15, 1990, San Mateo County staff requested the Regional Board to initiate enforcement action. The Regional Board issued a 13267 Letter on September 13, 1990 to Southern Pacific requesting a subsurface investigation work plan be submitted by October 15, 1990. Southern Pacific responded to the Regional Board's request with the same letter submitted to the County on August 10, 1990.

i. Southern Pacific submitted a remedial investigation work plan. On November 16, 1990, Regional Board staff provided written comments on the workplan and requested that a groundwater investigation be included as part of this phase of investigation.

j. The phase II remedial investigation commenced on February 13, 1991. A shallow trench was dug from beneath the former pump island and extended to the former underground tank pit. Eight soil borings were drilled and one monitoring well was installed.

k. On June 3, 1991, Southern Pacific submitted the Phase II Investigation report summarizing the field investigation conducted in February 1991. Two monitoring wells (OW-2 and MW-1) which located adjacent to the former underground tanks contained free product (See Figure 2). The newly installed monitoring well MW-2 located upgradient from the former tank pit contained 4700 ppb of TPH-gasoline. The highest soil contamination was detected from boring B2 at 15 feet below grade surface (hereinafter, bgs). This sample contained 3400 ppm of TPH-gasoline. Boring B2 was located at the former underground tank pit. Boring B4 which was located downgradient from the former tank pit contained 1400 ppm of TPH-gasoline at 16 feet bgs.

l. After reviewing the Phase II Investigation report, the County requested a interim remedial measure work plan be submitted to address the free product issue, and a work plan to conduct further investigation by September 27, 1991.

m. On September 27, 1991, Southern Pacific submitted an Interim Remedial Measure work plan which proposed to perform only monthly hand bailing of the free product.

n. San Mateo County deemed the proposed interim remedial measure to be inadequate. In a letter dated October 7, 1991, San Mateo County requested that a revised Interim Remedial Measure work plan be submitted by November 15, 1991. Upon Southern Pacific's request, San Mateo County extended the deadline for the submittal of a revised Interim Remedial Measure Work Plan to October 25, 1991.

o. On October 30, 1991, San Mateo County representative met with Southern Pacific. Southern Pacific proposed to excavate the contaminated soil to groundwater table as an interim remedial measure.

p. In a letter dated November 1, 1991, Southern Pacific stated a revised site work plan would be submitted to incorporate both the intent of Interim Remedial Measure and soil excavation/remediation. This work plan has never been submitted.

q. San Mateo County issued an Order to Southern Pacific pursuant to the California Underground Storage Tank Regulations, Health and Safety Code Article 4, Section 25299.37, and the Porter-Cologne Water Quality Control Act Sections 13267-13268. The Order requested a detailed remedial investigation work plan be submitted and that necessary remediation be conducted.

r. On February 23, 1994, the Regional Water Board issued a 13267 Letters to Southern Pacific requesting delineation of soil and groundwater contamination and initiate necessary remediation activities.

s. On March 29, 1994, Southern Pacific submitted a Site Investigation /Preliminary Soil Remediation Workplan. This work plan proposed the excavation of impacted soil and the installation of one up/crossgradient monitoring well. The workplan was deemed to be inadequate by San Mateo County and Regional Board staff.

t. On April 11, 1994, San Mateo County issued Southern Pacific a Notice of Violation.

u. On April 15, 1994, the Executive Officer of the Regional Board concurrently issued Southern Pacific a Notice of Violation.

v. On April 18, 1994, Southern Pacific submitted a Revised Work Plan. In a letter dated May 4, 1994, San Mateo County notified Southern Pacific that the Revised Work Plan was still unacceptable as it failed to delineate the extent of soil contamination and still proposed only one well.

w. A meeting was held on April 28, 1994 in San Mateo County Department of Health Services. The attending parties including Regional Board staff, San Mateo County staff, officials from the City of Belmont, Southern Pacific, Mr. Rosing (the owner of the adjacent site, the Belmont Car Wash), and his attorney. Also present was Mr. Rory Campbell, the attorney for the Joint Power Board, the current property owner. Southern Pacific agreed to conduct additional on and off-site investigation.

x. On May 3, 1994, Regional Board and San Mateo County staff, Southern Pacific representatives and representatives from Belmont Car Wash met on site to discuss the scope for the next phase of investigation. Following the meeting, Southern Pacific prepared and implemented a revised workplan, and the work pursuant to this plan was completed on June 3, 1994.

3. REGULATORY STATUS

Previous studies indicated that both the soil and groundwater at the Site have been contaminated by total petroleum hydrocarbons as gasoline, benzene, toluene, xylene, and ethyl-benzene. Numerous requests were made by both Regional Board and San Mateo County staff for Southern Pacific to delineate both soil and groundwater contamination. To date, the extent of soil and groundwater contamination has not been defined. Southern Pacific, has however, completed the field work to assess the extent of contamination from the subject site. The results of this investigation are to be submitted as part of the requirements of this Order.

a. Southern Pacific Transportation Company

Southern Pacific is a discharger because it was the owner of the property at the time of release.

b. Peninsula Corridor Joint Powers Board

The Peninsula Corridor Joint Powers Board is comprised of the City and County of San Francisco, the San Mateo County Transit Authority, and the Santa Clara County Transit Authority. The Peninsula Corridor Joint Powers Board is considered a discharger because it is the current property owner. However, since the release occurred prior to the Peninsula Corridor Joint Powers Board ownership of the subject property, they are considered secondarily responsible for the soil and groundwater contamination emanating from the site.

Therefore, the Peninsula Corridor Joint Powers Board is secondarily liable and

have responsibility for the soil and groundwater cleanup only in the event that Southern Pacific fails to comply with the prohibitions, specifications, and provisions of this Board Order.

c. Southern Pacific and the Joint Power Board are hereinafter referred to as the "Dischargers".

4. HYDROGEOLOGY The first water bearing zone occurs at 17 to 19 feet below grade surface. The first three to five feet below grade consists of a gravelly clay fill. A silty clay underlies the gravel fill to a depth varying from 10 to 20 feet. Beneath this silty clay there is a horizontally discontinuous clayey gravel lens which varies from 1.5 to 3 feet in thickness. The clayey gravel lens may serve as a preferential pathway for the contamination to travel off-site.

5. ADJACENT PROPERTIES Land uses in the area are mainly commercial. Several other dischargers have been identified in the area, mainly with leaking underground storage tanks. On 3/1/84, the Unocal station located on 699 Ralston Avenue lost 14,000 gallons of gasoline. This Unocal station is approximately 350 linear feet downgradient from Belmont Car Wash site. During the period from 3/6/84 to 9/27/84, Unocal Corporation installed 41 monitoring wells and numerous groundwater extraction wells.

Southern Pacific owned the adjacent property, 1051 El Camino Real, Belmont, from 1920s until 1994. This property has been used as a gasoline station, car wash and auto detailing facility since late 1970s. The super unleaded tank failed a tank tightness test in 1986. However, no repair record nor tank re-testing report was ever submitted. In an investigation conducted by Southern Pacific it was confirmed that unauthorized release had occurred from the tank system. In addition, the unleaded tank failed a tank tightness test in April of 1994. Belmont Car Wash has never conducted any corrective action. Regional Board staff is recommending that separate Site Cleanup Requirements be issued simultaneously to Belmont Car Wash. Should investigation by the named dischargers determine that probable contribution of pollution exists from an adjacent site, and is hindering the remediation efforts set forth by the requirements herein, further Board action (issuance of separate Site Cleanup Requirements) may be necessary to include these off-site sources.

6. SUBSURFACE INVESTIGATIONS Two site investigations (Converse Environmental Consultant in 1986, and SP Environmental Systems, Inc. in 1991) have been performed to determine the extent of petroleum contamination in the soil and groundwater due to the continuing unauthorized release from the underground fuel tanks. Soil and groundwater in the first aquifer has been impacted with petroleum hydrocarbons, benzene, toluene, xylene, and ethyl-benzene. The contamination has migrated off-site and has

impacted other properties within the vicinity.

Currently an investigation is under way to determine the extent of soil contamination on and off-site, and to delineate the vertical and horizontal extent of the groundwater contamination.

7. GROUNDWATER CONTAMINATION The first groundwater bearing zone has been impacted with petroleum hydrocarbons, benzene, toluene, xylene, ethylbenzene. Free product has been documented in one of the on-site wells. Groundwater contamination has been detected approximately 600 feet north (downgradient) of the Site. The down gradient extent of the plume emanating from the site has not yet been determined.

   Two other dischargers have been identified within the immediate area that have leaking underground storage tanks. These sites will require further remedial actions. The primary constituents from these tanks are total petroleum hydrocarbons as gasoline. The owner or responsible party for each site has been notified about the upcoming remedial activities for the subject site. Each discharger has been asked for its full cooperation in the cleanup of the groundwater within the region. Regulation of the dischargers under separate Site Cleanup Requirements is presently being pursued.

8. INTERIM REMEDIAL ACTIONS No interim remedial action has been performed to date.

9. SCOPE OF THIS ORDER This Order contains tasks for the completion of soils and groundwater characterization at the Site; evaluation of remedial actions for on-Site soil contamination; completion of groundwater characterization off-Site; evaluation and implementation of off-Site groundwater controls to arrest the migration of contamination emanating from the Site; implementation of final cleanup actions for soils on-Site and groundwater both on-Site and off-Site caused by the contamination emanating from the Site. These tasks are necessary to alleviate the threat to surface and groundwater posed by further migration of chemicals originating from the Site, and to provide a substantive technical basis for designing and evaluating the effectiveness of final cleanup alternatives.

10. The Regional Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986. The Board amended its Basin Plan on September 16, 1992, and the State Board approved it on April 27, 1993, with approval from the State Office of Administrative Law pending. Section 1 of the 1992 Basin Plan amendments, "Implementation of Statewide Plans," was remanded by the State Board on June 23, 1994, due to reference

to two Statewide Plans that are no longer legally in affect. The Basin Plan identifies beneficial uses and water quality objectives for the surface and ground waters in the region, as well as discharge prohibitions intended to protect beneficial uses.

11. The present and potential beneficial uses for groundwater are listed in Section II of the Water Quality Control Plan. The shallow groundwater zone underlying the site currently has no existing use. The potential beneficial uses as outlined in Section II for the groundwater zone underlying and adjacent to the facility include:

    a. Industrial process water supply
    b. Industrial service water supply
    c. Municipal and Domestic water supply
    d. Agricultural water supply

12. The nearest surface water body to the Site, approximately 3/4 of a mile away, is Belmont Creek. Belmont Creek is a tributary to Belmont Slough. The existing and potential beneficial uses of Belmont Slough include:

    a. Water Contact Recreation
    b. Non-Contact Water Recreation
    c. Preservation of Rare and Endangered Species
    d. Estuarine Habitat
    e. Wildlife habitat
    f. Fish spawning
    g. Saltwater Species Habitat

13. The Dischargers have caused or permitted, and threaten to cause or permit waste to be discharged or deposited where it is or probably will be discharged to waters of the State and create or threaten to create a condition of pollution or nuisance.

14. This action is an Order to enforce the laws and regulations administered by the Regional Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of Title 14 of the California Administrative Code, Enforcement Actions by Regulatory Agencies.

15. The Regional Board has notified the Dischargers, responsible parties and interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the discharge and provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.

16. The Regional 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, that the Dischargers shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous materials in a manner which will degrade water quality or adversely affect the beneficial uses of the waters of the State is prohibited.

2. Further significant migration of pollutants through subsurface transport to waters of the State is prohibited.

3. Activities associated with subsurface investigation and cleanup which will cause significant adverse migration of pollutants are prohibited.

B. SPECIFICATIONS

1. Remediation Activities: The Dischargers shall conduct Site investigation, monitoring and remediation activities as needed to define the current hydrogeologic conditions, to define the lateral and vertical extent of soil contamination on-Site, to define the lateral and vertical extent of groundwater pollution on or emanating from the Site, remediate as may be required any soil contamination on-Site, and remediate as may be required any groundwater pollution on or emanating from the Site. Should monitoring results show evidence of pollutant migration, the source of which is the Site, additional characterization and remediation may be required.

2. Nuisance Clause: The storage, handling, treatment or disposal of soil or groundwater containing pollutants shall not create a nuisance as defined in Section 13050(m) of the California Water Code.

3. Clean-up Levels - Soils: The cleanup goals for on-Site contaminated soils are as follows. For total petroleum hydrocarbons as gasoline (TPH-g) the residual soil concentration shall be equal or less than 10 ppm and for total petroleum hydrocarbons as diesel (TPH-d) the residual soil concentration shall be equal to or less than 100 ppm. For benzene, toluene, ethylbenzene, and xylene (BTEX) the residual concentrations shall be non-detect using appropriate method detection limits. All samples shall be analyzed using applicable EPA analytical methods or

methods shown through State or peer review approval to be equivalent to EPA methods.

The soil cleanup levels can be appropriately modified by the Executive Officer if the Dischargers are able to demonstrate, with site-specific data, that higher levels of contaminants in the soil will not threaten the waters of the State and that human health and the environment are protected. If any contaminants are left in the soil in concentrations in excess of the cleanup levels, follow up groundwater monitoring will be required.

4. Clean-up Levels - Groundwater: With respect to any polluted groundwater to which the source of contaminants is the Site, final cleanup levels and goals for polluted groundwater, including sources of drinking water, on-Site and off-Site, shall be in accordance with the State Water Resources Control Board's Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California", and other applicable standards. Final cleanup standards shall be based on an evaluation of the cost, effectiveness of the proposed remedy, and a risk assessment to determine any affects on human health and the environment, and shall be approved by the Executive Officer. These levels shall not exceed adopted primary or secondary maximum contaminant levels for benzene (1 ppb), toluene (1,000 ppb), ethylbenzene (680), and xylene (1,750 ppb) and have a goal of reducing the mobility, toxicity, and volume of pollutants.

5. Reclamation: If groundwater extraction and treatment is considered as an alternative, the feasibility of water reuse, re-injection, and disposal to the sanitary sewer must be evaluated. Based on the Regional Board Resolution 88-160, the Dischargers shall optimize, with a goal of 100%, the reclamation or reuse of groundwater extracted as a result of cleanup activities. The Dischargers shall not be found in violation of this Order if documented factors beyond the Dischargers' control prevent the Dischargers from attaining this goal, provided the Dischargers have made a good faith effort to attain this goal. If reuse or re-injection is part of a proposed alternative, an application for Waste Discharge Requirements may be required. If discharge to waters of the State is part of a proposed alternative, an application for an NPDES permit must be completed and submitted, and must include the evaluation of the feasibility of the water reuse, re-injection, and disposal to the sanitary sewer.

C. PROVISIONS

1. The Dischargers shall comply with the Prohibitions and Specifications above, in accordance with the following time schedule and tasks. In performing the tasks, should the Dischargers experience difficulty with obtaining access to other properties, the Regional Board, shall require uncooperative landowners and tenant of property affected by the discharge to cooperate or, if necessary, to participate in investigation, cleanup, and abatement.

2. If Southern Pacific fails to comply with any of the provisions of this Order, and the Executive Officer has issued his written determination specifying in what respects Southern Pacific has failed to comply, the obligation of the Peninsula Corridor Joint Powers Board to comply with the provisions of this Order shall commence sixty (60) days after its receipt from the Regional Board of actual notice of the nature of default and a copy of the Executive Officer's determination thereof.

   a. **TASK**: SUBMIT RESULTS OF PHASE III ENVIRONMENTAL INVESTIGATION

      DUE DATE: July 22, 1994

      Description: The Dischargers shall submit a technical report acceptable to the Executive Officer containing the results of the investigation as specified in the 5/13/94 Addendum to the April 18, 1994 Revised Site Investigation Workplan prepared by Industrial Compliance and approved by San Mateo County on May 27, 1994.

   b. **TASK**: SUBMIT A GROUNDWATER MONITORING PLAN

      DUE DATE: July 22, 1994

      Description: Submit a groundwater monitoring plan, acceptable to the Executive Officer, that addresses monitoring the groundwater wells representative of the conditions found in the First groundwater bearing zones on and off the site. The plan shall include monitoring of the groundwater in the areas where total petroleum hydrocarbons, benzene, toluene, xylene, and ethyl-benzene that originated from the subject site and have thus far been detected. The monitoring plan may be modified based upon the results obtained from the current investigation and subsequent investigations with concurrence from the Regional Board staff.

c. **TASK**: SUBMIT A WORKPLAN FOR ADDITIONAL GROUNDWATER INVESTIGATION AND CHARACTERIZATION

DUE DATE: August 22, 1994

Description: The Dischargers shall submit a workplan acceptable to the Executive Officer for additional investigation necessary to fully characterize and define the extent of the groundwater contamination emanating from the Site.

d. **TASK**: SUBMIT A WORKPLAN FOR INTERIM REMEDIATION OF CONTAMINATED SOILS AND GROUNDWATER WITHIN THE BELMONT GRADE SEPARATION PROJECT AREA

DUE DATE: August 22, 1994

Description: The Dischargers shall submit a workplan acceptable to the Executive Officer for the remediation of contaminated soils, and free product as specified in Sections B-3 and B-4.

e. **TASK**: IMPLEMENTATION OF GROUNDWATER MONITORING PLAN

DUE DATE: September 15, 1994

Description: The Discharger shall implement a quarterly monitoring program as outlined in TASK (b).

f. **TASK**: SUBMIT THE RESULTS OF THE ADDITIONAL INVESTIGATION AS OUTLINED IN TASK (c).

DUE DATE: October 21, 1994

Description: The Dischargers shall submit a technical report acceptable to the Executive Officer containing the results of the investigation as specified in the workplan outlined in TASK (c).

g. **TASK**: SUBMIT A REPORT OF THE INTERIM REMEDIATION IN ACCORDANCE WITH TASK (d).

DUE DATE: January 16, 1995

Description: The Dischargers shall submit a technical report acceptable to the Executive Officer containing the results of the interim remediation as described in Task (d).

h. **TASK:** SUBMIT A FINAL SITE REMEDIATION PLAN ADDRESSING SOIL AND ALL GROUNDWATER POLLUTION FOUND AS A RESULT OF TASKS (a) and (b), ON AND OFF THE PROPERTY THAT ORIGINATED FROM THE SUBJECT SITE THAT HAS NOT BEEN REMEDIATED AS PART OF THE INTERIM MEASURES AS OUTLINED IN TASK (d).

DUE DATE: February 16, 1995

Description: Submit a Site Remediation Plan, acceptable to the Executive Officer, that fully describes any remedial actions to be taken to control, abate and/or remove pollution (the source of which is the Site) found in the soils on Site and the groundwater on and off-Site in the shallow aquifer. The plan shall include: a discussion of all existing data, a review of the effectiveness of the interim remedial measures from the previous investigations, preliminary plans for interim groundwater remedial action as deemed necessary, preliminary plans of proposed extraction and treatment systems, and a comprehensive schedule for implementation of such remedial action(s).

i. **TASK:** COMMENCE IMPLEMENTATION OF THE FINAL REMEDIAL ACTION PLAN FOR SOILS AND GROUNDWATER ON AND OFF SITE

DUE DATE: Forty-five days after approval of the final remediation action plan

j. **TASK:** SUBMIT A REPORT ON THE EFFECTIVENESS OF THE FINAL REMEDIAL ACTION FOR BOTH SOILS AND GROUNDWATER

DUE DATE: June 30, 1995

Description: Submit a technical report, acceptable to the Executive Officer, which evaluates the effectiveness of any required remedial actions for the soil and groundwater emanating from the subject property. This report should include implementation and/or modifications of additional measures

necessary to fully remediate or contain the groundwater.

3. The Dischargers shall submit to the Regional Board acceptable reports on the compliance with the requirements of this Order, and acceptable activity monitoring reports that contain descriptions and results of work and analysis performed. These reports are to be submitted according to a program prescribed by the Regional Board and as outlined below.

   a. **ON A QUARTERLY BASIS,** the Dischargers shall submit status reports, which may be prepared in a business letter format, documenting compliance with this Order commencing on **November 1, 1994.** Thereafter, reports shall be due **quarterly** on the 15 of each ensuing February, May, August, and November. Each quarterly report shall cover the previous calendar quarter and include at least the following information:

      i. Summary of the work completed since submittal of the previous report, and work projected to be completed before the submittal of the next report.

      ii. Identification of any identified obstacles which may threaten compliance with the schedule set forth by this Order, and what actions are being taken to overcome these obstacles.

   b. **ADDITIONALLY ON A QUARTERLY BASIS,** technical reports documenting quarterly groundwater monitoring shall be submitted by the Dischargers to the Regional Board commencing **November 1, 1994,** and covering the previous calendar quarter. Each quarterly monitoring report shall include, but not be limited to, the following information:

      i. Cumulative tabulated results of free product measurements and water quality sampling analyses for all monitoring wells both on and off-Site. This data shall be accompanied by contamination isoconcentration plume maps for each chemical constituent of concern for the first water bearing formations based upon the results of the recent sampling event.

      ii. A cumulative tabulation of all well construction details and quarterly water level measurements.

      iii. Quarterly updated water table and piezometric surface

maps, based upon the most recent water level measurements for all affected water bearing zones for all on-Site and off-Site wells.

iv. A cumulative tabulation of volume of extracted groundwater, quarterly chemical analyses results for all extraction wells, and a report indicating the pounds of pollutants removed during the quarter and total pounds of pollutants removed to date.

v. Reference diagrams and maps including the hydrogeologic conditions of the Site, and appropriately scaled and detailed base maps showing the location of all monitoring wells and extraction wells, and identifying facilities and structures.

c. **ON AN ANNUAL BASIS**, technical reports on the progress of compliance with all requirements of this Order and any proposed modifications which could increase the effectiveness of final cleanup actions shall be submitted to the Regional Board by the Dischargers. The first annual compliance report is due **December 31, 1994**, and would cover the previous calendar years activities. Annual reports may include quarterly reports due concurrently. The annual progress reports shall include, but not necessarily be limited to, progress on site investigation and remediation activities, operation and implementation of interim and final remediation systems, effectiveness of remediation actions and systems, and an evaluation of the feasibility of meeting the groundwater and soil cleanup goals established by this Order.

4. The dischargers may, by written request, seek modifications or revisions, or termination of this Order or any program, plan, or schedule submitted pursuant to this Order at any time. This Order and any applicable program, plan, or schedule may be modified, terminated, or revised by the Regional Board.

5. If the Dischargers are delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the Dischargers shall promptly notify the Executive Officer. If, for any reason, the Dischargers are unable to perform any activity or submit any document within the time required under this Order, the Dischargers may make a written request for a specified extension of time. The extension request shall include justification for the delay, and shall be submitted to the Regional Board in advance of the date on which the activity is to be performed or the document is due. The Regional Board staff may

propose an amendment to the Order and bring the matter to the Board for consideration.

6. Nothing in this Order is intended or shall be construed to limit or preclude any right the dischargers have to seek administrative and/or judicial review of any orders and determinations of the Board and/or its staff.

7. All hydrogeological plans, specifications, technical reports and documents shall be signed by or stamped with the seal of a State registered geologist, registered civil engineer, or certified engineering geologist.

8. All samples shall be analyzed by a State certified laboratory or laboratory accepted by the Regional Board using approved EPA methods for the type of analysis to be performed. All laboratories or the consultant shall be required to maintain quality assurance/quality control records for Regional Board review for a period of six years.

9. The Dischargers shall maintain in good working order, and operate in the normal standard of care, any facility or control system installed to achieve compliance with the requirements of this Order.

10. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order shall be provided to the following agencies:

    a. San Francisco Bay Regional Water Quality Control Board
    b. San Mateo County Health Department
    c. City of Belmont

11. The Dischargers shall permit, within the scope of each of their authorities, the Regional Board or its authorized representative, in accordance with Section 13267 (c) of the California Water Code:

    a. Entry upon dischargers' premises in which any pollution sources exist, or are suspected to exist, or inspection of any required records, which are relevant to this Order.

    b. Access to copy any records required to be kept under the terms or conditions of this Order.

    c. Inspection of any monitoring equipment or methodology implemented in response to this 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 Discharger.

12. To the extent a Discharger has any ownership or present possessory interest in or to the Site, such Discharger shall file a report in a timely manner on any changes in Site occupancy and ownership associated with this facility/property described in this Order.

13. If in performing any work pursuant to this Order, any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the Dischargers shall report such a discharge to this Board, at (510) 286-1255 on weekdays during office hours from 8:00 a.m. to 5:00 p.m., and the Office of Emergency Services at (800) 852-7550 during non-office hours. A written report shall be filed with the Board within five (5) working days and shall contain information relative to: the nature of the waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control and Countermeasure Plan in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons notified.

14. Any provisions of this Order substantially identical to provisions which the State Water Board or a court of law determines to be in excess of the Board's legal authority shall have no force or effect in this Order.

15. This Order is intended to be the primary regulating document by which Site cleanup shall proceed for the Dischargers and properties identified herein, with the Regional Board as lead agency. The Dischargers shall establish a primary contact representing the name of the designated Dischargers and submit the named representative to the Regional Board.

16. If the Executive Officer finds that the Discharger(s) have failed to comply with the Provisions of this Order, he is authorized to issue a complaint for Board consideration of Administrative Civil Liabilities, or after approval of the Board Chairperson, to request the Attorney General to take appropriate action against the Discharger(s), including injunctive and civil remedies, if appropriate.

17. Pursuant to Section 13304 of the California Water Code, the Discharger(s) is (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 discharge of

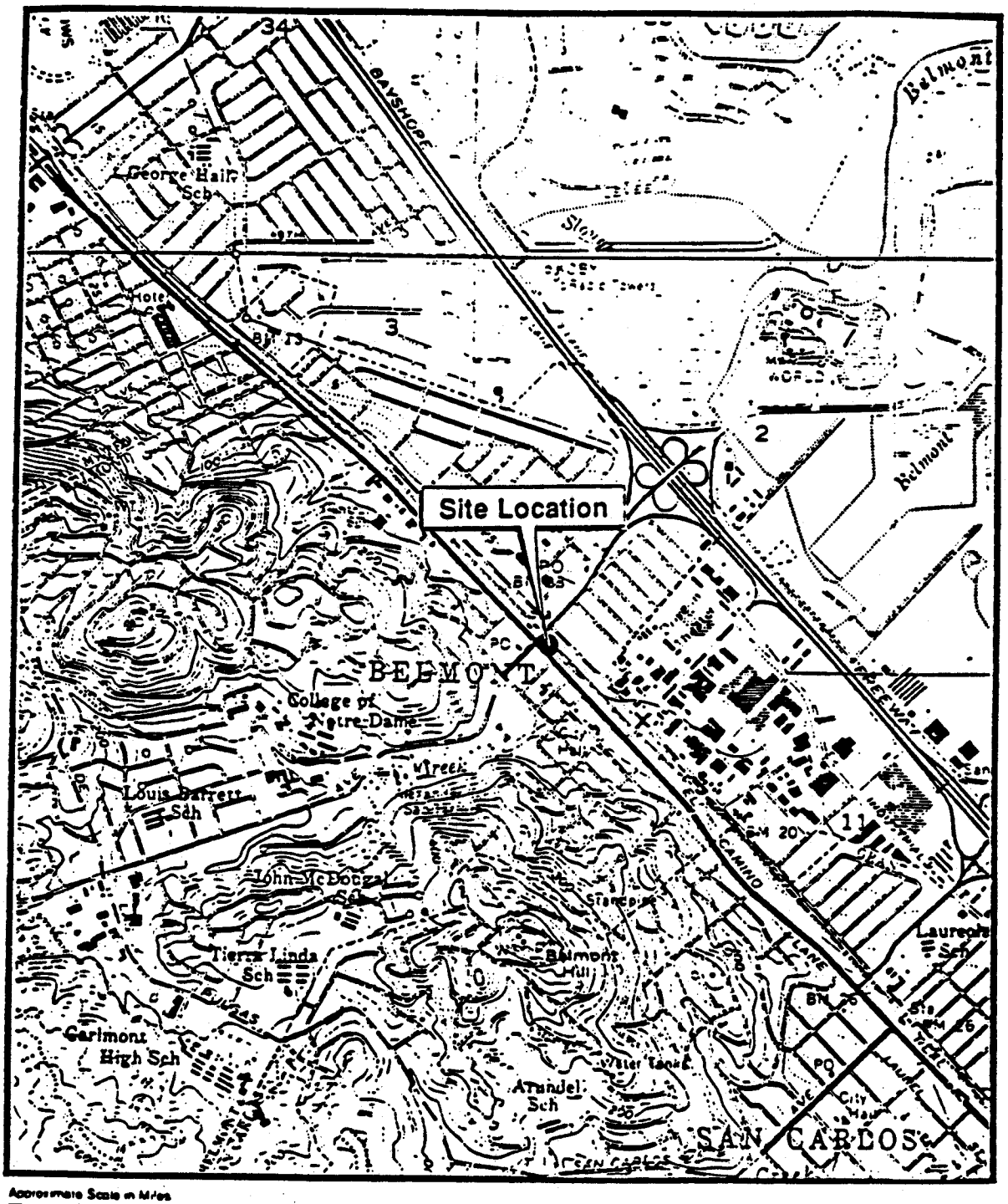
waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial actions. Upon receipt of a billing statement for such costs, the Discharger(s) shall reimburse the Regional Board.

18. The Regional Board will review this Order periodically and may revise the requirements when necessary.

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 20, 1994.

Lawrence P. Kolb

for Steven R. Ritchie
Executive Officer



Approximate Scale in Miles

0 .38

Reference:
U.S.G.S. 7.5 Minute Series (Topographic)
Sand Mateo Quadrangle
California - San Mateo County

Industrial Compliance A Subsidiary of SP Environmental Systems, Inc.	SITE LOCATION MAP SOUTHERN PACIFIC TRANSPORTATION COMPANY 1001 EL CAMINO REAL BELMONT, CALIFORNIA	Figure 1	
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Drawn Patti Decker	Checked By Ron Derrick	Scale as shown	

Bw445/WP 0084/F 01 8100

Figure 1: Site Location Map

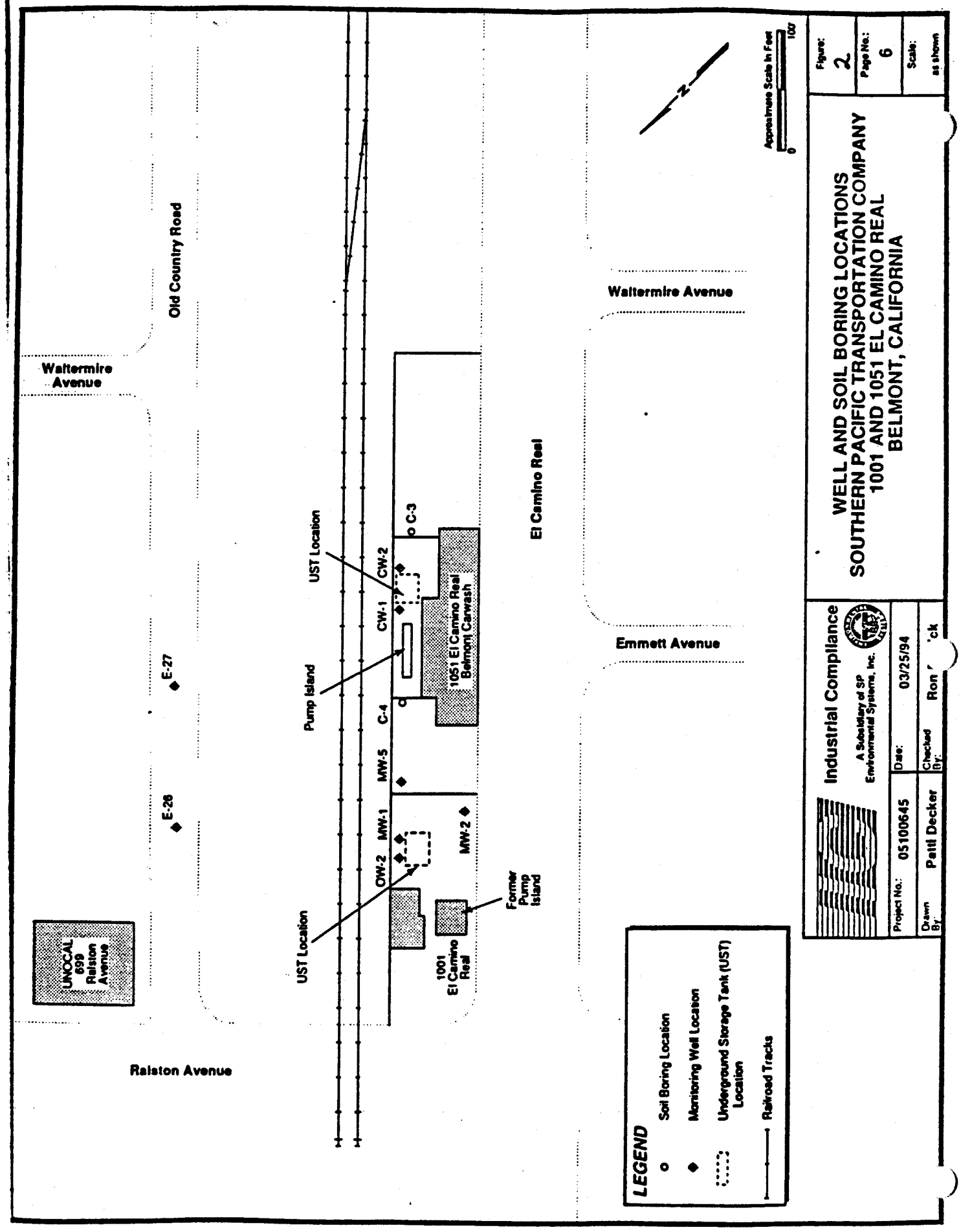

Figure 2: Site Plan