

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 99-095

ADOPTION OF FINAL SITE CLEANUP REQUIREMENTS AND RESCISSION OF  
ORDER NOS. 97-103 and 98-102 FOR:

F.J. FEDERIGHI TRUST B, DOUGLAS T. FEDERIGHI, MICHAEL H. FEDERIGHI,  
EDEN DEVELOPMENT COMPANY, ESTATE OF JOHN B. BECKETT,  
THOMAS J. BECKETT, PAMELA BECKETT SCOTT, JOHN R. BECKETT,  
SHARON LOUISE BOWMAN (deceased, and represented by BRUCE R. BOWMAN),  
RICHARD W. SULLIVAN, CAROLYN RIDING, BEVERLY J. RIDING,  
NANCY RIDING RICE, AND SUSAN KAHL

for the property located at

14883 E. 14TH STREET  
SAN LEANDRO, ALAMEDA COUNTY

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

1. **Site Location:** The Site is located at 14883 East 14<sup>th</sup> Street, San Leandro, Alameda County. The site is bounded on the east and north by East 14<sup>th</sup> Street and Hesperian Boulevard, respectively. Residential properties are present to the south and west of the site. Current site facilities consist of a restaurant, bank, retail outlet, and parking lots.
2. **Site History:** Swiss Cleaners operated a dry cleaning plant on the southeast side of the site from the early 1960's until 1996. Current site facilities consist of a restaurant, bank, retail outlet, and parking lots.
3. **Named Dischargers:** The F.J. Federighi Trust B, Douglas T. Federighi, Michael H. Federighi, and Eden Development Company, comprise one of two groups of former property owners. The Estate of John B. Beckett, Thomas J. Beckett, Pamela Beckett Scott, John R. Beckett, Sharon Louise Bowman (deceased, and represented by Bruce R. Bowman), Richard W. Sullivan, Carolyn Riding, Beverly J. Riding, Nancy Riding Rice, and Susan Kahl comprise the other group of former property owners. These two groups are named as dischargers because they owned the property during the time that unauthorized releases of volatile organic compounds (VOCs) occurred from the dry cleaning facility. Although previous site operators would be considered dischargers by virtue of their business activities and chemical use on Site, the Board has been unable to locate these companies and they no longer appear to be in business.

Although the current property owner, GM San Leandro, would be considered a discharger, in this instance they are not being named as a discharger because they did not own or operate the property at the time of the pollutant release and they have agreed to cooperate with the dischargers in complying with the Board Order. However, if the current owner becomes uncooperative or becomes an impediment to the dischargers complying with the Order, then the Board will name the current owner as a discharger.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the Site where it entered or could have entered waters of the State, the Board will consider adding those parties to this Order.

4. **Regulatory Status:** This site was subject to Site Cleanup Requirements (Order No. 97-103) adopted June 21, 1997, and as amended by Order No. 98-102.
5. **Site Hydrogeology:** The Site is underlain by clayey silts and sandy silts to five feet, which is in turn underlain by silty clays with interbedded sand lenses to twenty feet below ground surface (bgs). The regional shallow groundwater flow is northeast to southwest, from the San Leandro Hills toward San Leandro Creek and San Francisco Bay. Groundwater beneath the site is present at 10 to 11 feet bgs, and flows to the south-southwest toward the residential properties.
6. **Remedial Investigation:** Elevated concentrations of Tetrachloroethylene (PCE) and other volatile organic chemicals are found in soil and groundwater below the former dry cleaning facility. Several soil and groundwater investigations have been performed at the Site and the nearby properties since 1996. PCE was detected in shallow soil only in the vicinity of the former dry cleaner. Seventeen boreholes were advanced and four monitoring wells were installed at the site. Soil collected from these boreholes confirmed that PCE was present in soils only beneath the former dry cleaner and at a maximum concentration of 140 parts per million (ppm). PCE at a maximum concentration of 7,200 ppb was detected in a grab groundwater sample collected beneath the former dry cleaning facility.

A search of DWR's records indicated that four domestic wells are located immediately downgradient of the site and one former water supply well is located approximately 1,500 feet downgradient of the site. The domestic wells have detected PCE at concentrations up to 350 parts per billion (ppb). These wells are used only for irrigation; not drinking water. The four downgradient backyard wells have been used as sampling points to define and monitor the PCE plume. Three of the wells are placed in the shallow portion of the water-bearing zone (0 to 60 feet bgs). The fourth well, the Jensen Well, located 700 feet downgradient of the site, penetrates the upper water-bearing zone to a depth of 120 feet bgs. Based on information presented in the East Bay Plain study, the Jensen Well does not penetrate the regional aquitard, the Yerba Buena Mud, if it is indeed present in this location. The former water supply well, the Halcyon Well (197 foot deep), was located

approximately 800 feet south (downgradient) of the Jensen Well and is no longer in use. The dischargers were unable to pinpoint the exact location of this well, however, the area it existed in is now all residential properties. Because only 50 ppb of PCE has been detected in the Jensen Well and the Halcyon Well is over 800 feet downgradient of the Jensen Well, the Halcyon Well is not considered to be at risk from PCE originating from the site. The concentrations of VOCs in groundwater are likely to attenuate over distance, and are likely to be below detection limits at the Halcyon Well.

The half-mile well survey conducted by the dischargers found no wells, apart from those mentioned above, that were used for water supply.

All remedial investigations required at the Site have been completed.

7. **Adjacent Sites:** No facility immediately adjacent to the site is known to have a PCE release that has affected groundwater quality at the site.
8. **Interim Remedial Measures:** Soil interim remedial measures were implemented at this site to reduce the threat to water quality, public health, and the environment posed by the discharge of waste and to provide a technical basis for selecting and designing final remedial measures.

Soil vapor extraction was implemented on December 10, 1997, in the source area to reduce VOC concentrations in soil and prevent further leaching of VOCs to groundwater. At the time the SVE system was designed it was calculated that approximately 24.6 pounds of PCE was present in the soil beneath the site. The influent concentrations of PCE have been steadily declining and are approaching zero. The cumulative recovery of PCE for the SVE system is almost 25 pounds, indicating that the PCE source in soil has been removed.

As mentioned in finding 6, four backyard wells downgradient of the site are used for irrigation. One of these wells, the Jensen Well, was also used for drinking water supplies. The discharger contacted the owner of this well and arranged for them to be connected to the East Bay Municipal Utility District water supply system. This backyard well is no longer used for drinking water or irrigation.

Quarterly monitoring has shown a decrease in VOC concentrations in groundwater at the site and at the down gradient properties. Because the PCE in soil has been removed, natural attenuation processes such as dispersion and bio-degradation have combined to reduce the concentration of PCE in groundwater beneath the source area from a high of 1,500 ppb to 27 ppb in the source area.

9. **Feasibility Study:** The dischargers performed a feasibility study, which presented three remedial alternatives:

- **Alternative 1.** Shallow groundwater extraction (pump and treat).
- **Alternative 2.** Injecting a curtain of hydrogen releasing compound.
- **Alternative 3.** Monitored natural attenuation.

Experience at groundwater cleanup sites has shown that MCLs are rarely reached by pump and treat methods. Through the application of the SVE system, the dischargers have remediated the impacted soil at the site so there is no on-going source for the VOC contamination. SVE in the unsaturated soil has removed the source such that the VOC concentrations in groundwater are at levels that are appropriate for natural attenuation. Groundwater monitoring has confirmed the presence of breakdown (daughter) products of the VOCs indicating that natural attenuation is occurring at the site. Natural attenuation will reduce the VOC concentrations to MCLs within a reasonable time frame, 25 to 50 years. There is no anticipated or probable use of groundwater for domestic or municipal purposes foreseen in the site vicinity during this period, although the shallow groundwater may continue to be used for irrigation. Cleanup to these levels will result in acceptable residual risk to humans and the environment. Based on this information, shutting down the interim remedial system is warranted. Alternative 2 may accelerate the natural degradation of the VOCs in groundwater but the logistics of repeated applications of the compound on private properties make this alternative very costly. Additionally, groundwater monitoring indicates that natural attenuation of the VOCs is already occurring in the VOC plume. Therefore, Alternative 3, monitored natural attenuation of the VOCs in groundwater and institutional controls, has been selected for the final remedial action. These actions will be protective of human health and the environment in a cost-effective and timely manner.

10. **Cleanup Plan:** The cleanup plan, Alternative 3 of finding 9, as presented in the Proposed Final Remedial Action Plan, dated June 30, 1999, by Hageman-Aguilar, Inc., includes 1) properly abandoning one backyard domestic well, 2) installing one additional monitoring well, 3) implementing institutional controls, 4) implementing a monitored natural attenuation program, and 5) a two year status review.

11. **Risk Assessment:** The risk assessment (RA) evaluated the potential risks associated with exposure to VOC-impacted groundwater at the Site and Site vicinity. The RA evaluates potential exposure scenarios and potential receptors. Based on current land use and information obtained from the City of San Leandro Planning Department it is apparent that this site and the surrounding sites will remain zoned for mixed residential and commercial use for at least the next 25 years. There are four down gradient

backyard wells that have been impacted by the VOC plume originating at the Site. Fate and transport modelling performed for the RA show that San Leandro creek is not a potential receptor for the VOC plume.

Because the VOC-impacted soils have been essentially remediated at the site, the shallow groundwater is considered the primary source for the chemicals of concern (COCs). Additionally, because the highest concentrations of the COCs occur down gradient of the Site, the RA addressed exposure to the residents at that site. The downgradient sites are residential properties, four of which have backyard wells used for irrigation. All four wells are used only for irrigation; drinking water for residences is supplied by a public utility. The only potential mechanism for exposure to the COCs by these residents is through volatilization from the shallow ground water to indoor and outdoor air. The results of the risk calculations for current and future residents downgradient of the site show that the combined non-cancer risk (hazard quotient) is less than 1, and the excess cancer risk does not exceed  $1 \times 10^{-5}$ . Based on these calculations, and as long as the backyard wells are not used for drinking water, the VOCs in the shallow groundwater do not pose a threat to human health or the environment. For comparison, the Board considers the following risks to be acceptable at remediation sites: a hazard index of 1.0 or less for non-carcinogens, and an excess cancer risk of  $10^{-4}$  or less for carcinogens.

Due to excessive risk (potential future use of the shallow groundwater for drinking water purposes) that will be present at the site pending full remediation, institutional constraints are appropriate to limit on-site exposure to acceptable levels. Institutional constraints should include a deed restriction that notifies future owners of sub-surface contamination and prohibits the use of shallow groundwater beneath the site as a source of drinking water until cleanup standards are met. Additionally, the institutional controls should include periodic notification to the down-gradient property owners regarding the VOC-impacted groundwater originating from the Site.

## 12. Basis for Cleanup Standards

- a. **General:** State Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to this discharge and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Cleanup levels other than background must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives. This order and its requirements are consistent with Resolution No. 68-16.

State Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304," applies to this discharge. This order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

- b. **Beneficial Uses:** The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on June 21, 1995. This updated and consolidated plan represents the Board's master water quality control planning document. The revised Basin Plan was approved by the State Water Resources Control Board and the Office of Administrative Law on July 20, 1995, and November 13, 1995, respectively. A summary of regulatory provisions is contained in Title 23, California Code of Regulations, Section 3912. The Basin Plan defines beneficial uses and water quality objectives for waters of the State, including surface waters and groundwaters.

Board Resolution No. 89-39, "Sources of Drinking Water," defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high TDS, low yield, or naturally high contaminant levels. Groundwater underlying and adjacent to the site qualifies as a potential source of drinking water.

The Basin Plan designates the following potential beneficial uses of groundwater underlying and adjacent to the site:

- o Municipal and domestic water supply
- o Industrial process water supply
- o Industrial service water supply
- o Agricultural water supply

At present, there is no known use of groundwater underlying the site, other than irrigation of landscaping, for the above purposes.

- c. **Basis for Groundwater Cleanup Standards:** The groundwater cleanup standards for the site are based on applicable water quality objectives and are the more stringent of EPA and California primary maximum contaminant levels (MCLs).
13. **Future Changes to Cleanup Standards:** The goal of this remedial action is to restore the beneficial uses of groundwater underlying and adjacent to the site. Results from other sites suggest that full restoration of beneficial uses to groundwater as a result of active remediation at this site may not be possible. If full restoration of beneficial uses is not technologically nor economically achievable within a reasonable period of time,

then the dischargers may request modification to the cleanup standards or establishment of a containment zone, a limited groundwater pollution zone where water quality objectives are exceeded. Conversely, if new technical information indicates that cleanup standards can be surpassed, the Board may decide that further cleanup actions should be taken.

14. **Reuse or Disposal of Extracted Groundwater:** Board Resolution No. 88-160 allows discharges of extracted, treated groundwater from site cleanups to surface waters only if it has been demonstrated that neither reclamation nor discharge to the sanitary sewer is technically and economically feasible. The dischargers have complied with Board Resolution No. 88-160.
15. **Basis for 13304 Order:** The dischargers have caused or permitted waste to be discharged or deposited where it is or probably will be discharged into waters of the State and creates or threatens to create a condition of pollution or nuisance.
16. **Cost Recovery:** Pursuant to California Water Code Section 13304, the dischargers are hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the 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.
17. **CEQA:** This action is an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
18. **Notification:** The Board has notified the dischargers and all 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 an opportunity to submit their written comments.
19. **Public Hearing:** The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

**IT IS HEREBY ORDERED**, pursuant to Section 13304 of the California Water Code, that the dischargers (or their agents, successors, or assigns) shall cleanup and abate the effects described in the above findings as follows:

## A. PROHIBITIONS

1. The discharge of wastes or hazardous substances in a manner which will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.
2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.
3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of wastes or hazardous substances are prohibited.

## B. CLEANUP PLAN AND CLEANUP STANDARDS

1. **Implement Cleanup Plan:** The dischargers shall implement the cleanup plan described in finding 10.
2. **Groundwater Cleanup Standards:** The following groundwater cleanup standards shall be met in all wells identified in the Self-Monitoring Program:

Constituent	Standard (ug/l)	Basis
PCE	5	California MCL
TCE	5	California MCL
Cis-1,2-DCE	6	California MCL
Vinyl Chloride	0.5	California MCL

## C. TASKS

1. **ABANDON JENSEN WELL AND INSTALL MONITORING WELL**

COMPLIANCE DATE                      February 29, 2000

Submit a technical report to the Executive Officer documenting the abandonment of the backyard well on the Jensen property and the installation of a monitoring well nearby to monitor the shallow groundwater.

2. **PROPOSED INSTITUTIONAL CONSTRAINTS**

COMPLIANCE DATE: February 29, 2000

Submit a technical report acceptable to the Executive Officer documenting procedures to be used by the dischargers to prevent or minimize human exposure to soil and groundwater contamination prior to meeting cleanup standards. Such procedures shall include ensuring that the current owner record a deed restriction for the Site prohibiting the use of on-site shallow groundwater as a source of drinking water, and periodic notification to the affected down-gradient property owners regarding VOC contaminated groundwater originating from the Site.

3. **IMPLEMENTATION OF INSTITUTIONAL CONSTRAINTS**

COMPLIANCE DATE: 60 days after Executive Officer approval

Submit a technical report acceptable to the Executive Officer documenting that the proposed institutional constraints have been implemented.

4. **TWO-YEAR STATUS REPORT**

COMPLIANCE DATE: November 30, 2001

Submit a technical report acceptable to the Executive Officer evaluating the effectiveness of the approved cleanup plan. The report should include:

- a. Summary of effectiveness in controlling contaminant migration and protecting human health and the environment
- b. Comparison of contaminant concentration trends with cleanup standards
- c. Comparison of anticipated versus actual costs of cleanup activities
- d. Performance data (e.g. groundwater volume extracted, chemical mass removed, mass removed per million gallons extracted)
- e. Cost effectiveness data (e.g. cost per pound of contaminant removed)
- f. Summary of additional investigations (including results) and significant modifications to remediation systems
- g. Additional remedial actions proposed to meet cleanup standards (if applicable) including time schedule

If cleanup standards have not been met and are not projected to be met within a reasonable time, the report should assess the technical practicability of meeting cleanup standards and may propose an alternative cleanup strategy.

5. **IMPLEMENTATION OF ACTIVE GROUNDWATER REMEDIATION**

COMPLIANCE DATE: 180 days after requested  
by Executive Officer

Submit a technical report acceptable to the Executive Officer documenting the resumption of active groundwater remediation. Such a request by the Executive Officer would be based on evidence of significant VOC migration or significant increases in VOC concentrations in groundwater.

6. **EVALUATION OF NEW HEALTH CRITERIA**

COMPLIANCE DATE: 90 days after requested  
by Executive Officer

Submit a technical report acceptable to the Executive Officer evaluating the effect on the approved cleanup plan of revising one or more cleanup standards in response to revision of drinking water standards, maximum contaminant levels, or other health-based criteria.

7. **EVALUATION OF NEW TECHNICAL INFORMATION**

COMPLIANCE DATE: 90 days after requested  
by Executive Officer

Submit a technical report acceptable to the Executive Officer evaluating new technical information which bears on the approved cleanup plan and cleanup standards for this site. In the case of a new cleanup technology, the report should evaluate the technology using the same criteria used in the feasibility study. Such technical reports shall not be requested unless the Executive Officer determines that the new information is reasonably likely to warrant a revision in the approved cleanup plan or cleanup standards.

8. **Delayed Compliance:** If the dischargers are delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the dischargers shall promptly notify the Executive Officer and the Board may consider revision to this Order.

## D. PROVISIONS

1. **No Nuisance:** The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in California Water Code Section 13050(m).
2. **Good O&M:** The dischargers shall maintain in good working order and operate as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this Order.
3. **Cost Recovery:** The dischargers shall be liable, pursuant to California Water Code Section 13304, to the Board for all reasonable costs actually incurred by the 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. If the site addressed by this Order is enrolled in a State Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the dischargers over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.
4. **Access to Site and Records:** In accordance with California Water Code Section 13267(c), the dischargers shall permit the Board or its authorized representative:
  - a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
  - b. Access to copy any records required to be kept under the requirements of this Order.
  - c. Inspection of any monitoring or remediation facilities installed 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 dischargers.
5. **Self-Monitoring Program:** The dischargers shall comply with the Self-Monitoring Program as attached to this Order and as may be amended by the Executive Officer.

6. **Contractor / Consultant Qualifications:** All technical documents shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.
7. **Lab Qualifications:** All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).
8. **Document Distribution:** Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:
  - a. City of San Leandro, Fire Department, Hazardous Materials Section

The Executive Officer may modify this distribution list as needed.

9. **Reporting of Changed Owner or Operator:** The dischargers shall file a technical report on any changes in site operations from its current commercial use, or changes in ownership of the property described in this Order.
10. **Reporting of Hazardous Substance Release:** If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the dischargers shall report such discharge to the Regional Board by calling (510) 622-2300 during regular office hours (Monday through Friday, 8:00 to 5:00).

A written report shall be filed with the Board within five working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.

This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

12. **Rescission of Existing Order:** This Order supercedes and rescinds Order No. 97-103 and Order No. 98-102.

13. **Periodic SCR Review:** The Board will review this Order periodically and may revise it when necessary.

I, Lawrence P. Kolb, Assistant 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 November 18, 1999.



Lawrence P. Kolb  
Assistant Executive Officer

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FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT  
YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO:  
IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE  
SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR  
INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY  
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Attachments: Site Map  
Self-Monitoring Program

HESPERIAN BOULEVARD

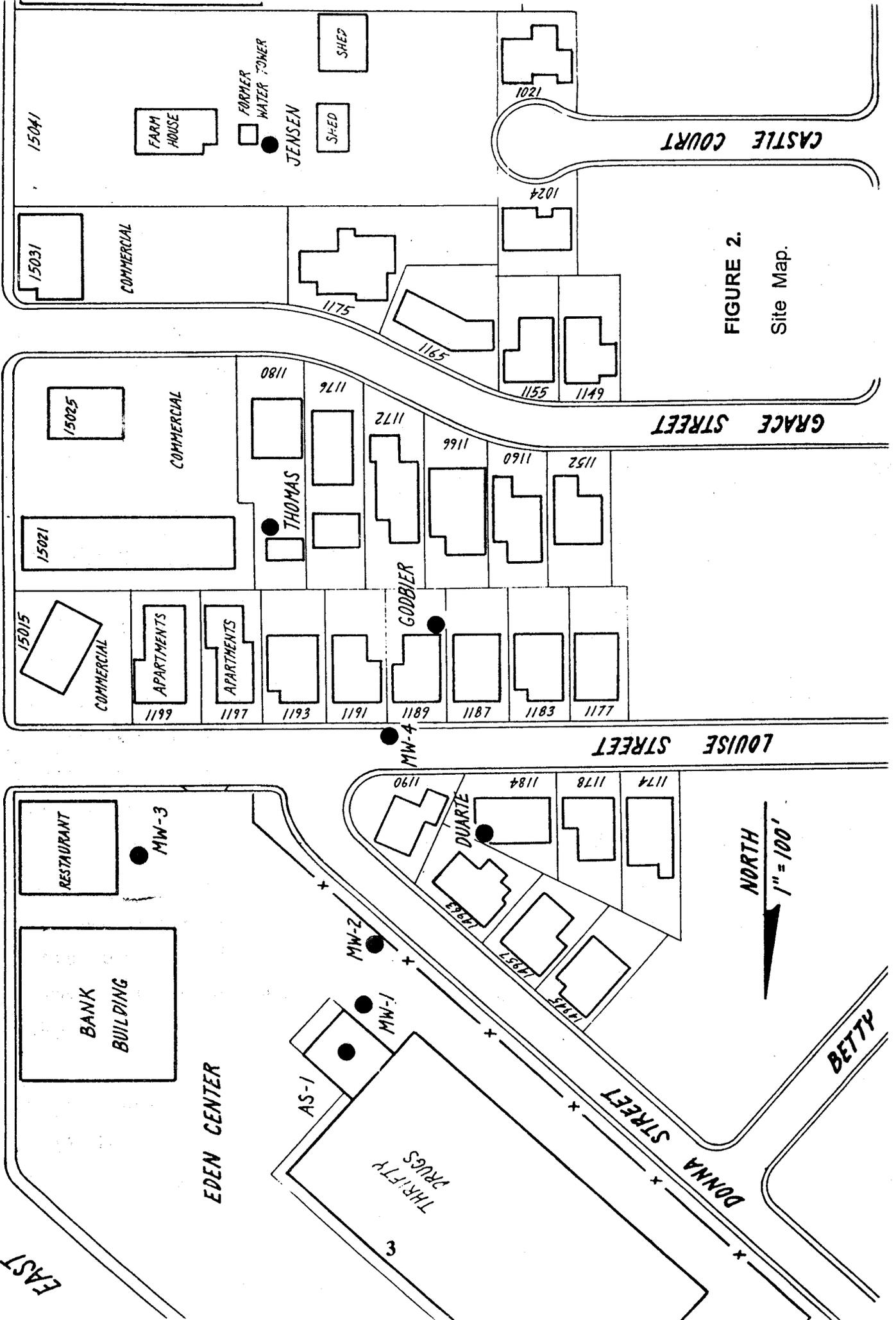


FIGURE 2.  
Site Map.

EAST 14th ST.

BANK BUILDING

RESTAURANT

MW-3

EDEN CENTER

AS-1

MW-1

MW-2

THRIFTY DRUGS

MW-4

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM FOR:

F.J. FEDERIGHI TRUST B, DOUGLAS T. FEDERIGHI, MICHAEL H. FEDERIGHI,  
EDEN DEVELOPMENT COMPANY, ESTATE OF JOHN B. BECKETT,  
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NANCY RIDING RICE, AND SUSAN KAHL

for the property located at

14883 E. 14TH STREET  
SAN LEANDRO, ALAMEDA COUNTY

1. **Authority and Purpose:** The Board requests the technical reports required in this Self-Monitoring Program pursuant to Water Code Sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Board Order No. 99-095 (site cleanup requirements).
2. **Monitoring:** The dischargers shall measure groundwater elevations semi-annually in all monitoring wells, and shall collect and analyze representative samples of groundwater according to the table in Appendix I.

The dischargers shall sample any new monitoring or extraction wells semi-annually and analyze groundwater samples for the same constituents as shown in the above table. The dischargers may propose changes in the above table; any proposed changes are subject to Executive Officer approval.

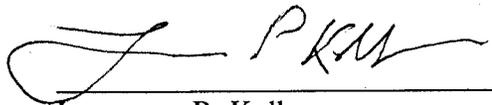
3. **Semi-Annual Monitoring Reports:** The dischargers shall submit semi-annual monitoring reports to the Board no later than 30 days following the end of the half year (e.g. report for first half of the year due July 30). The first semi-annual monitoring report shall be due on January 30, 2000. The reports shall include:
  - a. **Transmittal Letter:** The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the discharger's principal executive officer or his/her duly authorized representative, and shall include a statement by the official, under

penalty of perjury, that the report is true and correct to the best of the official's knowledge.

- b. **Groundwater Elevations:** Groundwater elevation data shall be presented in tabular form, and a groundwater elevation map should be prepared for each monitored water-bearing zone. Historical groundwater elevations shall be included in the second report each year.
  - c. **Groundwater Analyses:** Groundwater sampling data shall be presented in tabular form, and an isoconcentration map should be prepared for one or more key contaminants for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical groundwater sampling results shall be included in the second report each year. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases. Supporting data, such as lab data sheets, need not be included (however, see record keeping - below).
  - d. **Groundwater Extraction:** If applicable, the report shall include groundwater extraction results in tabular form, for each extraction well and for the site as a whole, expressed in gallons per minute and total groundwater volume for the quarter. The report shall also include contaminant removal results, from groundwater extraction wells and from other remediation systems (e.g. soil vapor extraction), expressed in units of chemical mass per day and mass for the quarter. Historical mass removal results shall be included in the second report each year.
  - e. **Status Report:** The semi-annual report shall describe relevant work completed during the reporting period (e.g. site investigation, interim remedial measures) and work planned for the following half year.
5. **Violation Reports:** If the dischargers violate requirements in the Site Cleanup Requirements, then the dischargers shall notify the Board office by telephone as soon as practicable once the dischargers have knowledge of the violation. Board staff may, depending on violation severity, require the dischargers to submit a separate technical report on the violation within five working days of telephone notification.
6. **Other Reports:** The dischargers shall notify the Board in writing prior to any site activities, such as construction or underground tank removal, which have the potential to cause further migration of contaminants or which would provide new opportunities for site investigation.

7. **Record Keeping:** The dischargers or their agent shall retain data generated for the above reports, including lab results and QA/QC data, for a minimum of six years after origination and shall make them available to the Board upon request.
8. **SMP Revisions:** Revisions to the Self-Monitoring Program may be ordered by the Executive Officer, either on his/her own initiative or at the request of the dischargers. Prior to making SMP revisions, the Executive Officer will consider the burden, including costs, of associated self-monitoring reports relative to the benefits to be obtained from these reports.

I, Lawrence P. Kolb, Assistant Executive Officer, hereby certify that this Self-Monitoring Program was adopted by the Board on November 18, 1999.

A handwritten signature in cursive script, appearing to read 'L P Kolb', written over a horizontal line.

Lawrence P. Kolb  
Assistant Executive Officer

Attachment: Appendix I

## APPENDIX I

### Self-Monitoring Schedule for Eden Center

Well #	Sampling Frequency	Analyses
MW-1	SA	8010
MW-3	SA	8010
MW-4	SA	8010
GODBIER	SA	8010
THOMAS	SA	8010
DUARTE	SA	8010
JENSEN/REPLACEMENT(MW-5)	SA	8010

Key: SA = Semi-Annually

8010 = EPA Method 8010 or equivalent