

RESPONSE TO CITY OF SAN JOSE COMMENTS

NGUYEN PROPERTY CLOSURE CLAIM 6653

Comment 1: The City is concerned with the potential migration of groundwater contamination beneath the park, specifically the relatively high concentrations of MTBE and benzene found in groundwater monitoring wells sampled at 960 South King in May 2011 and other monitoring events.

Response: The only two petroleum constituents that remains in the groundwater at this site that exceeds the water quality objectives a MTBE in source area well MW -1 at 53 µg/L and downgradient well STMW-3 at 6.5 µg/L and benzene in MW-1 at 16 µg/L, STMW-3 at 7.1 µg/L and STMW-4 at 2.9µg/L. Based on the rapid decrease in the concentration of MTBE between these two wells, the residual dissolved plume of MTBE and benzene is projected to not extend beyond sidewalk of the subject site before meeting the water quality objective for MTBE of 5 and benzene of 1 µg/L. Therefore, migration of the dissolved petroleum hydrocarbons is highly unlikely. In addition, the rose diagram included with the 2011 sampling data and comments indicates predominate groundwater flow direction of northwest (more than 70% of sampling events). This flow direction puts the Park in a crossgradient location.

Comment 2: The agricultural production well located in the Park was connected to a windmill in 2007, with the intent of using it to irrigate the orchards and gardens. Although this connection has not been implemented, it is possible that the City may want to activate the well in the future to use for irrigation.

Response: Based on published data regarding the expected water production from windmills (~1 gallon per minute or ~1,500 gallon per day), would not have a hydraulic effect on the dissolved plume approximately 290 feet from the well.