Shaw Environmental, Inc.

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Shaw Environmental, Inc.

February 15, 2013 Shaw Project No. 146852

Mr. Aaron Costa
Hazardous Materials Specialist II
Local Oversight Program
County of Santa Clara Department of Environmental Health
1555 Berger Drive, Suite 300
San Jose, California 95112-2716

Subject: Work Plan Addendum for Additional Site Assessment and Response to Technical Comments
AT&T Facility
95 South Almaden Avenue
San Jose, California

Dear Mr. Costa:

Please find enclosed the work plan addendum requested in your letter dated January 3, 2013 detailing proposed procedures for additional off-site investigation to delineate the extent of any underlying impact to the east of the AT&T facility. The proposed off-site soil boring investigation will consist of advancing up to four soil borings along San Fernando Street, with soil and groundwater samples collected to assess impact from the December 2010 fuel release from the AT&T facility as well as the extent of the off-site component of the plume.

In addition, a December 12, 2012 letter from CSCDEH requested a full version of the Status Report of Initial Site Assessment (IT Corporation, July 30, 1992) report. Shaw and AT&T have researched available records and were unable to locate a copy of the complete July 1992 report. However, Shaw believes that the results of the investigative activities performed by IT Corporation beginning in February 1992 appear to have been detailed in the May 1993 Site Assessment Report. Shaw has been able to locate a copy of this report and will forward upon request.

If you have any questions regarding the information presented in this work plan addendum, please contact Robert Delnagro with Shaw at (925) 288-2103 or Mr. Mark Smith with AT&T EH&S at (214) 464-8173. Any written correspondence should be directed to:

Mr. Mark Smith
AT&T EH&S
308 South Akard; Room 1700
Dallas, Texas 75202

Thank you for your assistance with this project.

Sincerely,

Shaw Environmental, Inc.

Robert Delnagro
Project Manager

cc: Mr. Mark Smith – AT&T EH&S

Perjury Statement

I declare, under penalty of perjury, that the information and/or recommendations contained in the attached report are true and correct to the best of my knowledge

Mark T Smith

Digitally signed by Mark T Smith
DN: cn=Mark T Smith, o=AT&T EH&S, ou=Remediation, email=ms7848@att.com, c=US
Date: 2013.02.15 07:39:33 -06'00'

2/15/2013

Mr. Mark Smith
AT&T EH&S

Date

WORK PLAN ADDENDUM FOR ADDITIONAL SITE ASSESSMENT
AT&T FACILITY
95 SOUTH ALMADEN AVENUE
SAN JOSE, CALIFORNIA

Prepared for:

AT&T Environment, Health & Safety
308 South Akard, Room 1700
Dallas, Texas 75202

Prepared by:

Shaw Environmental, Inc.
4005 Port Chicago Highway
Concord, California 94520

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February 2013

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1.0 Introduction

Shaw Environmental, Inc. (Shaw) was retained by AT&T Environment, Health & Safety to generate a work plan for further assessment at the AT&T property located at 95 South Almaden Avenue in San Jose, California (Figure 1). This work plan was prepared and submitted to the County of Santa Clara Department of Environmental Health (CSCDEH) in December 2012. On January 3, 2013, CSCDEH requested that a work plan addendum be submitted which included a scope of work to define the extent of contamination in both soil and groundwater near former borings SB-1 through SB-5. Borings SB-1 through SB-5 were installed to address an October 2010 diesel release near San Fernando Street and Almaden Boulevard. Elevated soil contamination was previously reported in the area as well as shallow subsurface utilities. The purpose of the additional borings is to determine if the present utilities have created lateral or preferential pathways for contaminant migration. A copy of the January 3, 2013 CSCDEH letter is included in Appendix A.

This work plan proposes additional activities to include advancing up to five off-site soil borings along the area of San Fernando Street and Almaden Boulevard to delineate the eastern extent of underlying soil and groundwater impact.

1.1 Site Description

The AT&T property is located in downtown San Jose, Santa Clara County, California, and occupies an entire city block. The surrounding area is primarily commercial-office properties. A Greyhound Bus station is located to the east of the AT&T property, across South Almaden Avenue. Guadalupe Creek lies approximately 1,000 feet to the west and flows to the north. Current and former diesel fuel underground storage tank (UST) systems occupy the southwestern margin and western corner of the city-block.

The AT&T property contains an active switching station for telephone services to portions of the southern San Francisco Bay. The above-grade structures consist of a five-story building which contains offices and telephone switching equipment and a one-story building for maintenance personnel. The facility's in-use UST complex consists of three diesel fuel, 20,000-gallon USTs piped into the building to support backup power generation for the site's critical communication infrastructure. Most of the subject property is paved and used for parking of AT&T-owned and private vehicles.

A nine-story secured AT&T building occupies the southern portion of the site. The building dates to approximately 1950 and has been expanded several times. AT&T expanded the facility and around 1950 purchased land from the Greyhound bus lines company. The acquired land expanded the AT&T facility northward towards Post Street and along Almaden Boulevard. At some time in the 1970s, the City of San Jose seized a portion of the AT&T property under eminent domain and widened Almaden Boulevard further northeast. This area included portions of the AT&T facility and a portion of the former Greyhound property. In the early 1990s, AT&T discovered older diesel fuel in the vicinity of a UST complex which was being relocated. The pre-1992 and post-1992 AT&T UST complexes nearly adjoin the City of San Jose's Almaden Boulevard boundary and lie between the AT&T building and Post Street (Figure 2). A search of historic records in the early-to-mid 1990s indicated the former Greyhound ownership and maintenance use of the acquired property.

1.2 Site Background

Previous historical information about the investigations at the subject site was summarized in the December 2012 Work Plan for Soil-Vapor Survey and Off-Site Monitoring Well Installation, submitted under separate cover.

1992 UST Removal

In October 1992, five 10,000-gallon diesel USTs and associated piping were removed from the southwest corner of the site. Soil samples collected during the UST removals were reported to contain elevated concentrations of petroleum hydrocarbons. Three 20,000-gallon diesel USTs were subsequently installed in a new excavation about 90 feet north of the UST removal area (Figure 2).

October 2010 Diesel Fuel Release

On October 2, 2010, AT&T was alerted that a release of diesel fuel had occurred at the 95 South Almaden Avenue facility. Approximately 1,300 gallons of fuel was pumped up to a day tank on the top floor of the building which overflowed through a vent pipe onto the roof of the facility, and then migrated down through a series of drains onto two sub-roofs, continued through the roof drain and pooled along the curb and street area along West San Fernando Street. A portion of the pooled diesel fuel also migrated into the storm drain inlet at the intersection of West San Fernando Street and Almaden Boulevard and traveled through the main storm drain approximately 1,000 feet to the Guadalupe River.

In a letter dated January 11, 2011, the CSCDEH requested submittal of a work plan detailing an investigation into whether all the diesel fuel that had entered into the storm drain system had been discharged into the Guadalupe River and whether diesel fuel that had pooled along the curb of West San Fernando Street had migrated downward through the asphalt pavement. Shaw submitted a work plan detailing the proposed investigation dated March 1, 2011, and approved by the CSCDEH in a letter dated May 16, 2011.

Shaw surveyed the storm drain as part of this investigation. Due to the steep slope of the drain line, high flow rate of water in the pipe, and good condition of the sections surveyed, Shaw determined that it was unlikely any of the diesel fuel had migrated out of the storm drain system. Shaw believed that the bulk of diesel fuel that had entered into the storm drain system was either discharged to the Guadalupe River and any residual fuel was removed during subsequent cleaning activities.

On August 16, 2011, Shaw personnel performed five soil borings, labeled SB-1 through SB-5, every 20 feet along the area of West San Fernando Street where diesel fuel had pooled. Due to the presence of electrical and telecommunication lines and CSJDPW permit requirements, the borings had to be performed 3 feet from the curb, in between the utility lines. During boring advancement, concrete slurry was encountered immediately underlying the pavement in borings SB-1 and SB-2 which precluded sample collection. Based on the proximity to neighboring utilities, Shaw believed this slurry material was part of the seal around one or both of the adjacent utility lines. Soil borings SB-3, SB-4 and SB-5 were completed to depths of 2 to 3 feet below surface grade (bsg), with underlying material consisting of a sand and gravel fill material. Refusal was encountered in each of these borings by underlying concrete slurry. During boring advancement, a diesel odor was noted in the fill material retrieved from borings SB-4 and SB-5.

Results of the sample analysis detected TPH-D in sample SB-3 at a concentration of 1.9 milligrams per kilogram (mg/kg), in sample SB-4 at a concentration of 12,000 mg/kg, and in sample SB-5 at a concentration of 650 mg/kg. Ethylbenzene was detected in sample SB-5 at a concentration of 0.096 mg/kg, and xylenes in samples SB-4 and SB-5 at concentrations of 2.1 mg/kg and 0.38 mg/kg, respectively. No other analytes were detected.

2012 Soil Boring Investigation

In June 2012, Shaw oversaw the advancement of 19 Cone Penetration Test (CPT) and UVOST® borings and two direct-push soil borings at the site and along Almaden Boulevard and Post Street. Results of the investigation found that underlying petroleum hydrocarbons were generally found at depths of 15 feet to 23 feet bsg, and extended as deep as 28 feet bsg. The hydrocarbon plume also appeared to extend off-site, to the east, underneath Almaden Boulevard. In addition, some shallow contamination was found along Almaden Boulevard in an area where diesel fuel had pooled following the December 2010 release. Based on the results, Shaw determined that excavation was no longer feasible due to depth constraints and any excavation activities would leave a significant portion of impact remaining under the active UST complex and under Almaden Boulevard.

Due to the overall low permeability of underlying soils, heavy-end nature of the residual petroleum hydrocarbons, low overall groundwater gradient, and results of over 17 years of groundwater monitoring, Shaw determined that the plume underneath the AT&T property appeared to be stable and the most feasible remedial alternative was continuance of groundwater monitoring until property usage and street configuration changed. The stability of the off-site portion of the plume had not been confirmed but as soil types were not anticipated to vary greatly in the area of the plume, if no utilities are present at depths that could intercept impacted soils or groundwater (approximately 15 feet bsg), migration of this portion of the plume was also considered unlikely.

At the request of the CSCDEH, following review of this report, a work plan was prepared to detail completion of a soil-vapor survey to determine if there is any risk to workers at the facility, as well as completion of a off-site soil boring investigation and installation of monitoring wells to evaluate the extent of the off-site plume and monitor plume stability. The location of this work was primarily on the south and western portions of the subject site. This work plan was submitted to CSCDEH in December 2012. On January 3, 2013, CSCDEH requested that a work plan addendum be submitted which included a scope of work to define the extent of contamination in both soil and groundwater near former borings SB-1 through SB-5.

2.0 Scope of Work

This work plan addendum addresses proposed procedures for evaluating off-site soil and groundwater conditions at the eastern portion of the property in the location of former investigation borings SB-1 through SB-5. Planned activities include advancing up to four off-site direct-push borings and collection of soil and groundwater samples.

3.0 Proposed Field Activities

Soil boring activities in this addendum will consist of drilling up to four off-site soil borings along San Fernando Street. Proposed soil boring are depicted in Figure 3, but may be adjusted according to field conditions. All field activities will be conducted under the permits required by the appropriate regulatory agencies.

It should be noted that based on prior investigations in this area, electrical and tele-communications lines were discovered along the west side of San Fernando Street in addition to the adjacent sidewalk. As such, no borings are anticipated to be able to be installed along the sidewalk or first 5-10 feet of the western side of San Fernando Street. A road encroachment permit application and a traffic control plan will be prepared and submitted to the City of San Jose's Department of Public Works prior to any in-street work activities.

3.1 Underground Utility Location and Health and Safety

Prior to initiation of field activities, a site-specific health and safety plan will be developed to outline safety measures to be implemented during field activities. The proposed boring locations will be marked and Underground Service Alert (USA) will be contacted and notified of the anticipated locations and date of drilling. An independent utility locating service will be subcontracted to further assist in locating utilities near the anticipated drilling locations.

3.2 Soil Borings

Up to four direct-push borings will be advanced at select off-site locations along San Fernando Street by a C-57 licensed driller. Drilling equipment will be steam-cleaned to reduce the potential for contaminant introduction and sample cross-contamination. During the drilling, soil cores will be collected continuously from surface grade to the bottom of each boring, and logged using the ASTM's Visual-Manual Method of Soil Classification by a Shaw field geologist working under the supervision of a California-registered geologist. Intact soil samples will be evaluated for relative hydrocarbon content using a photoionization detector (PID). Samples

collected for laboratory analysis will be sealed with plastic caps over Teflon film, taped, labeled, placed on ice and sent to a state-certified laboratory under legal chain of custody.

Based on field observations, select soil samples from each borehole will be submitted to an ELAP-certified laboratory for analysis under chain-of-custody protocol. The samples will be analyzed for total petroleum hydrocarbons as diesel (TPH-D) and TPH-gasoline (TPH-G) under EPA method 8015 (modified), and for benzene, toluene, ethylbenzene and xylenes (BTEX) constituents and the fuel oxygenates MTBE, tert-butanol (TBA), di-isopropyl ether (DIPE), tert-amylmethyl ether (TAME), and ethyl tert-butyl ether (ETBE) under EPA method 8260B.

It is anticipated that two soil samples will be analyzed from each borehole: the sample with the greatest PID reading and a sample from the capillary fringe. All sampling equipment will be cleaned with non-phosphate detergent and rinsed with tap and deionized water before and after each sampling drive. Each borehole will be completed to a depth of up to approximately 28 feet bsg, although this depth may be adjusted in accordance with field conditions.

3.3 Groundwater Sample Collection

Following completion of direct-push soil borings, each borehole will be equipped with a temporary well screen in order to attempt collection of discreet groundwater samples from each location.

Groundwater has been encountered in the ongoing groundwater monitoring events at depths ranging from approximately 15 feet below top of casing (TOC) to 22 feet below TOC (Table 1). During previous investigations at the site, groundwater was initially encountered in a clayey silt and sand layer at depths ranging from approximately 15 feet to 23 feet bsg, and extending up to 28 feet bsg.

Groundwater samples from each borehole will be submitted to an ELAP-certified laboratory for analysis under chain-of-custody protocol. The samples will be analyzed for TPH-D and TPH-G under EPA method 8015 (modified), and for BTEX constituents and the fuel oxygenates MTBE, TBA, DIPE, TAME, and ETBE under EPA method 8260B.

3.4 Boring Surveying

The latitude and longitude data of the borings will be collected. The resultant data will be employed for submittal to the State of California's Geotracker database.

3.5 Boring Abandonment

After the collection of soil and groundwater samples, each boring will be backfilled with concrete grout and finished at surface grade in accordance with City of San Jose encroachment permit requirements.

3.6 Waste Disposal

Soil cuttings and decontamination water generated during field activities will be temporarily stored on-site in labeled, DOT-approved 55-gallon drums pending transport to an approved disposal facility. The soil and water will be disposed of following the completion of field activities.

3.7 Investigative Report

Shaw anticipates completing borings in conjunction with the scope of work outlined in the December 2012 Work Plan for Soil-Vapor Survey and Off-Site Monitoring Well Installation submitted under separate cover. Results of the activities proposed in this work plan will be presented in a summary report upon conclusion of field activities, receipt of laboratory analytical results, and data evaluation.

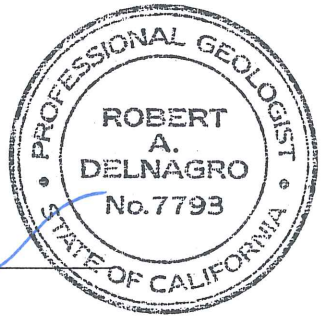
4.0 Signatures

The interpretations and conclusions contained in this report represent our professional opinions. These opinions are based on currently accepted engineering practices at this time and for this specific site. No additional warranty is implied or intended.

Prepared by:

Joe Pickard
Project Scientist
Shaw Environmental, Inc.

Reviewed by:



Rob Delnagro, P.G.
Project Manager
Shaw Environmental, Inc.

TABLE

Table 1
Summary of Groundwater Measurements
AT&T Facility
95 South Almaden Avenue
San Jose, California

Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-1	07/07/95	NA	95.44	16.05	79.39
MW-1	10/30/95	NA	95.44	17.15	78.29
MW-1	01/15/96	NA	95.44	NM	NA
MW-1	10/18/96	NA	95.44	16.7	78.74
MW-1	01/30/97	NA	95.44	14.14	81.30
MW-1	04/30/97	NA	95.44	15.81	79.63
MW-1	07/25/97	NA	95.44	15.59	79.85
MW-1	10/30/97	NA	95.44	NM	NA
MW-1	04/28/98	NA	95.44	12.77	82.67
MW-1	07/10/98	NA	95.44	13.71	81.73
MW-1	10/26/98	NA	95.44	14.81	80.63
MW-1	01/28/99	NA	95.44	15.04	80.40
MW-1	07/22/99	NA	95.44	14.57	80.87
MW-1	01/20/00	NA	95.44	NM	NA
MW-1	09/11/00	0.38	95.44	16.90	78.54
MW-1	01/29/01	0.79	95.44	16.68	78.76
MW-1	03/08/01	1.20	95.44	15.81	79.63
MW-1	06/21/01	0.85	95.44	15.65	79.79
MW-1	10/03/01	1.00	95.44	16.85	78.59
MW-1	12/21/01	1.66	95.44	17.00	78.44
MW-1	03/15/02	1.50	95.44	16.98	78.46
MW-1	04/16/02	1.05	95.44	16.96	78.48
MW-1	07/08/02	1.04	95.44	17.17	78.27
MW-1	10/08/02	0.05	95.44	17.60	77.84
MW-1	01/13/03	0.16	95.44	16.25	79.19
MW-1	04/15/03	0.10	95.44	16.21	79.23
MW-1	07/01/03	0.10	95.44	14.94	80.50
MW-1	10/14/03	0.39	95.44	16.64	78.80
MW-1	01/21/04	0.07	95.44	16.31	79.13
MW-1	04/07/04	NA	95.44	15.66	79.78
MW-1	07/07/04	1.68	95.44	15.84	79.60
MW-1	10/05/04	0.09	95.44	17.10	78.34
MW-1	03/10/05	NA	95.44	15.60	79.84
MW-1	06/07/05	NA	95.44	15.40	80.04
MW-1	08/09/05	NA	95.44	15.75	79.69
MW-1	11/09/05	NA	95.44	16.10	79.34
MW-1	02/01/06	NA	95.44	14.90	80.54
MW-1	05/03/06	NA	95.44	13.83	81.61
MW-1	07/25/06	NA	95.44	16.60	78.84
MW-1	11/06/06	NA	95.44	19.42	76.02
MW-1	02/21/07	1.68	95.44	20.62	74.82
MW-1	05/14/07	NA	95.44	18.85	76.59
MW-1	09/19/07	NA	95.44	15.99	79.45

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MW-1	12/03/07	NA	95.44	17.09	78.35
MW-1	03/27/08	0.66	95.44	15.80	79.64
MW-1	06/12/08	NA	95.44	17.08	78.36
MW-1	09/18/08	NA	95.44	17.77	77.67
MW-1	12/31/08	NA	95.44	17.99	77.45
MW-1	03/25/09	NA	95.44	17.17	78.27
MW-1	06/16/09	NA	95.44	17.39	78.05
MW-1	09/09/09	NM	95.44	NM	NM
MW-1	03/05/10	3.40	95.44	15.67	79.77
MW-1	09/17/10	NM	95.44	16.21	79.23
MW-1	03/23/11	2.20	95.44	15.03	80.41
MW-1	09/27/11	3.10	95.44	15.50	79.94
MW-1	03/21/12	NM	95.44	15.37	80.07
MW-1	09/28/12	4.00	95.44	16.70	78.74
MW-2	07/07/95	NA	97.20	18.85	78.35
MW-2	10/30/95	NA	97.20	19.68	77.52
MW-2	01/15/96	NA	97.20	19.90	77.30
MW-2	10/18/96	NA	97.20	20.09	77.11
MW-2	01/30/97	NA	97.20	18.46	78.74
MW-2	04/30/97	NA	97.20	18.12	79.08
MW-2	07/25/97	NA	97.20	18.64	78.56
MW-2	10/30/97	NA	97.20	19.63	77.57
MW-2	04/28/98	NA	97.20	16.34	80.86
MW-2	07/10/98	NA	97.20	17.31	79.89
MW-2	10/26/98	NA	97.20	18.58	78.62
MW-2	01/28/99	NA	97.20	19.03	78.17
MW-2	07/22/99	NA	97.20	18.72	78.48
MW-2	01/20/00	NA	97.20	19.52	77.68
MW-2	09/11/00	0.49	97.20	19.60	77.60
MW-2	01/29/01	0.63	97.20	20.17	77.03
MW-2	03/08/01	1.09	97.20	19.83	77.37
MW-2	06/21/01	0.60	97.20	19.80	77.40
MW-2	10/03/01	1.08	97.20	20.89	76.31
MW-2	12/21/01	1.18	97.20	21.00	76.20
MW-2	03/15/02	1.28	97.20	20.60	76.60
MW-2	04/16/02	1.03	97.20	20.50	76.70
MW-2	07/08/02	1.08	97.20	20.53	76.67
MW-2	10/08/02	0.07	97.20	20.97	76.23
MW-2	01/13/03	0.28	97.20	20.06	77.14
MW-2	04/15/03	0.39	97.20	19.57	77.63
MW-2	07/01/03	0.30	97.20	19.60	77.60
MW-2	10/14/03	0.48	97.20	20.27	76.93
MW-2	01/21/04	0.10	97.20	19.85	77.35
MW-2	04/07/04	NA	97.20	19.27	77.93
MW-2	07/07/04	3.54	97.20	19.40	77.80

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MW-2	10/05/04	0.08	97.20	20.49	76.71
MW-2	03/10/05	NA	97.20	19.59	77.61
MW-2	06/07/05	NA	97.20	19.10	78.10
MW-2	08/09/05	NA	97.20	19.10	78.10
MW-2	11/09/05	NA	97.20	19.89	77.31
MW-2	11/09/05	NA	97.20	19.89	77.31
MW-2	02/01/06	NA	97.20	18.88	78.32
MW-2	05/03/06	NA	97.20	17.91	79.29
MW-2	07/25/06	NA	97.20	20.03	77.17
MW-2	11/06/06	NA	97.20	22.21	74.99
MW-2	02/21/07	4.60	97.20	22.24	74.96
MW-2	05/14/07	NA	97.20	20.96	76.24
MW-2	09/19/07	NA	97.20	20.26	76.94
MW-2	12/03/07	NA	97.20	20.75	76.45
MW-2	03/27/08	0.33	97.20	20.08	77.12
MW-2	06/12/08	NA	97.20	20.54	76.66
MW-2	09/18/08	NA	97.20	21.49	75.71
MW-2	12/31/08	1.14	97.20	22.08	75.12
MW-2	03/25/09	1.62	97.20	21.38	75.82
MW-2	06/16/09	1.78	97.20	21.40	75.80
MW-2	09/09/09	2.40	97.20	21.70	75.50
MW-2	03/05/10	2.60	97.20	19.50	77.70
MW-2	09/17/10	1.82	97.20	19.87	77.33
MW-2	03/23/11	2.60	97.20	18.60	78.60
MW-2	09/27/11	2.80	97.20	19.05	78.15
MW-2	03/21/12	2.40	97.20	18.17	79.03
MW-2	09/28/12	2.80	97.20	18.84	78.36
MW-3	07/07/95	NA	96.75	18.10	78.65
MW-3	10/31/95	NA	96.75	19.19	77.56
MW-3	01/15/96	NA	96.75	19.10	77.65
MW-3	10/18/96	NA	96.75	19.22	77.53
MW-3	01/30/97	NA	96.75	17.07	79.68
MW-3	04/30/97	NA	96.75	17.46	79.29
MW-3	07/25/97	NA	96.75	17.91	78.84
MW-3	10/30/97	NA	96.75	18.19	78.56
MW-3	04/28/98	NA	96.75	15.69	81.06
MW-3	07/10/98	NA	96.75	16.64	80.11
MW-3	10/26/98	NA	96.75	17.70	79.05
MW-3	01/28/99	NA	96.75	17.87	78.88
MW-3	07/22/99	NA	96.75	17.63	79.12
MW-3	01/20/00	NA	96.75	19.41	77.34
MW-3	09/11/00	0.26	96.75	19.46	77.29
MW-3	01/29/01	0.29	96.75	19.45	77.30
MW-3	03/08/01	1.38	96.75	19.91	76.84
MW-3	06/21/01	0.31	96.75	18.73	78.02

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Summary of Groundwater Measurements
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Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-3	10/03/01	1.35	96.75	19.92	76.83
MW-3	12/21/01	1.21	96.75	20.03	76.72
MW-3	03/15/02	1.15	96.75	19.65	77.10
MW-3	04/16/02	1.03	96.75	19.53	77.22
MW-3	07/08/02	1.02	96.75	19.72	77.03
MW-3	10/08/02	0.06	96.75	20.15	76.60
MW-3	01/13/03	0.09	96.75	19.4	77.35
MW-3	04/15/03	0.23	96.75	18.82	77.93
MW-3	07/01/03	0.17	96.75	18.96	77.79
MW-3	10/14/03	0.39	96.75	19.65	77.10
MW-3	01/21/04	0.07	96.75	19.11	77.64
MW-3	04/07/04	NA	96.75	18.3	78.45
MW-3	07/07/04	1.09	96.75	18.65	78.10
MW-3	10/05/04	0.08	96.75	19.62	77.13
MW-3	03/10/05	NA	96.75	18.55	78.20
MW-3	06/07/05	NA	96.75	17.95	78.80
MW-3	08/09/05	NA	96.75	18.21	78.54
MW-3	11/09/05	NA	96.75	18.71	78.04
MW-3	02/01/06	NA	96.75	17.7	79.05
MW-3	05/03/06	NA	96.75	16.44	80.31
MW-3	07/25/06	NA	96.75	18.93	77.82
MW-3	11/06/06	NA	96.75	21.54	75.21
MW-3	02/21/07	3.27	96.75	22.17	74.58
MW-3	05/14/07	NA	96.75	20.93	75.82
MW-3	09/19/07	NA	96.75	19.14	77.61
MW-3	12/03/07	NA	96.75	19.72	77.03
MW-3	03/27/08	0.31	96.75	18.22	78.53
MW-3	06/12/08	NA	96.75	19.51	77.24
MW-3	09/18/08	NA	96.75	20.41	76.34
MW-3	12/31/08	1.23	96.75	20.77	75.98
MW-3	03/25/09	3.93	96.75	19.89	76.86
MW-3	06/16/09	1.92	96.75	20.20	76.55
MW-3	09/09/09	2.80	96.75	20.80	75.95
MW-3	03/05/10	3.00	96.75	18.88	77.87
MW-3	09/17/10	1.70	96.75	19.24	77.51
MW-3	03/23/11	2.00	96.75	18.60	78.15
MW-3	09/27/11	2.20	96.75	18.47	78.28
MW-3	03/21/12	2.80	96.75	17.88	78.87
MW-3	09/28/12	2.40	96.75	18.31	78.44
MW-4	07/07/95	NA	96.71	17.20	79.51
MW-4	10/31/95	NA	96.71	18.16	78.55
MW-4	01/15/96	NA	96.71	18.15	78.56
MW-4	10/18/96	NA	96.71	18.28	78.43
MW-4	01/30/97	NA	96.71	16.31	80.40
MW-4	04/30/97	NA	96.71	16.61	80.10

Table 1
Summary of Groundwater Measurements
AT&T Facility
95 South Almaden Avenue
San Jose, California

Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-4	07/25/97	NA	96.71	17.17	79.54
MW-4	10/30/97	NA	96.71	17.65	79.06
MW-4	04/28/98	NA	96.71	14.39	82.32
MW-4	07/10/98	NA	96.71	15.29	81.42
MW-4	10/26/98	NA	96.71	16.36	80.35
MW-4	01/28/99	NA	96.71	16.76	79.95
MW-4	07/22/99	NA	96.71	16.22	80.49
MW-4	01/20/00	NA	96.71	17.41	79.30
MW-4	09/11/00	0.39	96.71	17.73	78.98
MW-4	01/29/01	0.48	96.71	18.00	78.71
MW-4	03/08/01	1.71	96.71	17.58	79.13
MW-4	06/21/01	0.51	96.71	17.52	79.19
MW-4	10/03/01	0.90	96.71	18.66	78.05
MW-4	12/21/01	1.08	96.71	18.97	77.74
MW-4	03/15/02	1.17	96.71	18.85	77.86
MW-4	04/16/02	1.03	96.71	18.80	77.91
MW-4	07/08/02	1.06	96.71	18.87	77.84
MW-4	10/08/02	0.07	96.71	19.11	77.60
MW-4	01/13/03	0.32	96.71	17.54	79.17
MW-4	04/15/03	0.03	96.71	17.81	78.90
MW-4	07/01/03	0.25	96.71	17.25	79.46
MW-4	10/14/03	0.31	96.71	18.29	78.42
MW-4	01/21/04	0.08	96.71	18.00	78.71
MW-4	04/07/04	NA	96.71	17.45	79.26
MW-4	07/07/04	0.13	96.71	17.45	79.26
MW-4	10/05/04	0.04	96.71	18.65	78.06
MW-4	03/10/05	NA	96.71	17.68	79.03
MW-4	06/07/05	NA	96.71	17.15	79.56
MW-4	08/09/05	NA	96.71	17.28	79.43
MW-4	11/09/05	NA	96.71	18.00	78.71
MW-4	02/01/06	NA	96.71	16.84	79.87
MW-4	05/03/06	NA	96.71	15.53	81.18
MW-4	07/25/06	NA	96.71	18.10	78.61
MW-4	11/06/06	NA	96.71	20.28	76.43
MW-4	02/21/07	17.30	96.71	20.95	75.76
MW-4	05/14/07	NA	96.71	19.92	76.79
MW-4	09/19/07	NA	96.71	18.12	78.59
MW-4	12/03/07	NA	96.71	18.88	77.83
MW-4	03/27/08	0.30	96.71	18.09	78.62
MW-4	06/12/08	NA	96.71	18.71	78.00
MW-4	09/18/08	NA	96.71	19.66	77.05
MW-4	12/31/08	1.96	96.71	20.23	76.48
MW-4	03/25/09	0.82	96.71	19.22	77.49
MW-4	06/16/09	1.36	96.71	19.44	77.27
MW-4	09/09/09	2.80	96.71	19.80	76.91

Table 1
Summary of Groundwater Measurements
AT&T Facility
95 South Almaden Avenue
San Jose, California

Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-4	03/05/10	3.00	96.71	17.55	79.16
MW-4	09/17/10	1.81	96.71	18.10	78.61
MW-4	03/23/11	2.60	96.71	17.00	79.71
MW-4	09/27/11	2.60	96.71	17.47	79.24
MW-4	03/21/12	2.80	96.71	16.90	79.81
MW-4	09/28/12	2.20	96.71	17.10	79.61
MW-5	07/07/95	NA	96.01	16.20	79.81
MW-5	10/30/95	NA	96.01	17.30	78.71
MW-5	01/15/96	NA	96.01	17.25	78.76
MW-5	10/18/96	NA	96.01	17.28	78.73
MW-5	01/30/97	NA	96.01	14.93	81.08
MW-5	04/30/97	NA	96.01	15.78	80.23
MW-5	07/25/97	NA	96.01	16.20	79.81
MW-5	10/30/97	NA	96.01	16.59	79.42
MW-5	04/28/98	NA	96.01	13.39	82.62
MW-5	07/10/98	NA	96.01	14.32	81.69
MW-5	10/26/98	NA	96.01	16.11	79.90
MW-5	01/28/99	NA	96.01	15.69	80.32
MW-5	07/22/99	NA	96.01	15.45	80.56
MW-5	01/20/00	NA	96.01	16.85	79.16
MW-5	09/11/00	0.40	96.01	17.21	78.80
MW-5	01/29/01	0.42	96.01	17.16	78.85
MW-5	03/08/01	1.35	96.01	16.46	79.55
MW-5	06/21/01	0.41	96.01	16.35	79.66
MW-5	10/03/01	0.90	96.01	18.66	77.35
MW-5	12/21/01	1.01	96.01	17.82	78.19
MW-5	03/15/02	1.10	96.01	17.68	78.33
MW-5	04/16/02	1.01	96.01	17.63	78.38
MW-5	07/08/02	1.03	96.01	17.82	78.19
MW-5	10/08/02	0.05	96.01	18.00	78.01
MW-5	01/13/03	0.21	96.01	16.67	79.34
MW-5	04/15/03	0.09	96.01	16.79	79.22
MW-5	07/01/03	0.13	96.01	15.55	80.46
MW-5	10/14/03	0.51	96.01	17.30	78.71
MW-5	01/21/04	0.35	96.01	16.90	79.11
MW-5	04/07/04	NA	96.01	16.30	79.71
MW-5	07/07/04	0.76	96.01	16.37	79.64
MW-5	10/05/04	0.05	96.01	17.50	78.51
MW-5	03/10/05	NA	96.01	16.38	79.63
MW-5	06/07/05	NA	96.01	15.97	80.04
MW-5	08/09/05	NA	96.01	16.24	79.77
MW-5	11/09/05	NA	96.01	16.65	79.36
MW-5	02/01/06	NA	96.01	15.42	80.59
MW-5	05/03/06	NA	96.01	14.25	81.76
MW-5	07/25/06	NA	96.01	17.00	79.01

Table 1
Summary of Groundwater Measurements
AT&T Facility
95 South Almaden Avenue
San Jose, California

Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-5	11/06/06	NA	96.01	NM	NA
MW-5	02/21/07	18.50	96.01	20.40	75.61
MW-5	05/14/07	NA	96.01	19.24	76.77
MW-5	09/19/07	NA	96.01	16.55	79.46
MW-5	12/03/07	NA	96.01	17.68	78.33
MW-5	03/27/08	0.25	96.01	16.52	79.49
MW-5	06/12/08	NA	96.01	17.48	78.53
MW-5	09/18/08	NA	96.01	18.41	77.60
MW-5	12/31/08	2.09	96.01	18.85	77.16
MW-5	03/25/09	1.34	96.01	17.90	78.11
MW-5	06/16/09	1.04	96.01	18.24	77.77
MW-5	09/09/09	2.80	96.01	18.65	77.36
MW-5	03/05/10	2.90	96.01	16.20	79.81
MW-5	09/17/10	1.47	96.01	16.99	79.02
MW-5	03/23/11	2.50	96.01	15.95	80.06
MW-5	09/27/11	2.80	96.01	16.40	79.61
MW-5	03/21/12	2.40	96.01	16.10	79.91
MW-5	09/28/12	2.60	96.01	15.95	80.06
MW-6	07/07/95	NA	95.83	15.90	79.93
MW-6	10/30/95	NA	95.83	17.05	78.78
MW-6	01/15/96	NA	95.83	16.75	79.08
MW-6	10/18/96	NA	95.83	16.88	78.95
MW-6	01/30/97	NA	95.83	14.52	81.31
MW-6	04/30/97	NA	95.83	15.43	80.40
MW-6	07/25/97	NA	95.83	15.91	79.92
MW-6	10/30/97	NA	95.83	NM	NA
MW-6	04/28/98	NA	95.83	13.42	82.41
MW-6	07/10/98	NA	95.83	14.12	81.71
MW-6	10/26/98	NA	95.83	15.23	80.60
MW-6	01/29/99	NA	95.83	15.42	80.41
MW-6	07/22/99	NA	95.83	15.09	80.74
MW-6	01/20/00	NA	95.83	NM	NA
MW-6	09/11/00	0.37	95.83	17.10	78.73
MW-6	01/29/01	0.39	95.83	17.08	78.75
MW-6	03/08/01	1.51	95.83	16.31	79.52
MW-6	06/21/01	0.29	95.83	15.84	79.99
MW-6	10/03/01	0.98	95.83	17.15	78.68
MW-6	12/21/01	0.97	95.83	17.38	78.45
MW-6	03/15/02	1.05	95.83	17.30	78.53
MW-6	04/16/02	1.03	95.83	17.30	78.53
MW-6	07/08/02	1.20	95.83	17.45	78.38
MW-6	10/08/02	0.01	95.83	17.69	78.14
MW-6	01/13/03	0.21	95.83	16.43	79.40
MW-6	04/15/03	0.04	95.83	16.48	79.35
MW-6	07/01/03	0.14	95.83	15.58	80.25

Table 1
Summary of Groundwater Measurements
AT&T Facility
95 South Almaden Avenue
San Jose, California

Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-6	10/14/03	0.54	95.83	16.95	78.88
MW-6	01/21/04	0.12	95.83	16.53	79.30
MW-6	04/07/04	NA	95.83	15.89	79.94
MW-6	07/07/04	1.45	95.83	16.04	79.79
MW-6	10/05/04	0.12	95.83	17.26	78.57
MW-6	03/10/05	NA	95.83	15.92	79.91
MW-6	06/07/05	NA	95.83	15.69	80.14
MW-6	08/09/05	NA	95.83	15.96	79.87
MW-6	11/09/05	NA	95.83	16.22	79.61
MW-6	02/01/06	NA	95.83	15.12	80.71
MW-6	05/03/06	NA	95.83	14.10	81.73
MW-6	07/25/06	NA	95.83	16.98	78.85
MW-6	11/06/06	NA	95.83	19.41	76.42
MW-6	02/21/07	18.20	95.83	20.48	75.35
MW-6	05/14/07	NA	95.83	19.11	76.72
MW-6	09/19/07	NA	95.83	16.11	79.72
MW-6	12/03/07	NA	95.83	17.47	78.36
MW-6	03/27/08	0.33	95.83	16.25	79.58
MW-6	06/12/08	NA	95.83	17.14	78.69
MW-6	09/18/08	NA	95.83	18.06	77.77
MW-6	12/31/08	NA	95.83	18.35	77.48
MW-6	03/25/09	NA	95.83	17.51	78.32
MW-6	06/16/09	NA	95.83	17.90	77.93
MW-6	09/09/09	NM	95.83	NM	NA
MW-6	03/05/10	3.60	95.83	16.31	79.52
MW-6	09/17/10	NM	95.83	16.56	79.27
MW-6	03/23/11	2.80	95.83	15.60	80.23
MW-6	09/27/11	3.20	95.83	16.05	79.78
MW-6	03/21/12	NM	95.83	15.86	79.97
MW-6	09/28/12	3.80	95.83	16.10	79.73
MW-7	03/27/08	0.28	96.21	16.53	79.68
MW-7	06/12/08	NA	96.21	17.97	78.24
MW-7	09/18/08	NA	96.21	18.51	77.70
MW-7	12/31/08	2.05	96.21	18.88	77.33
MW-7	03/25/09	0.60	96.21	17.88	78.33
MW-7	06/16/09	1.27	96.21	18.40	77.81
MW-7	09/09/09	3.20	96.21	18.86	77.35
MW-7	03/05/10	3.40	96.21	16.78	79.43
MW-7	09/17/10	1.80	96.21	17.19	79.02
MW-7	03/23/11	3.20	96.21	16.10	80.11
MW-7	09/27/11	2.20	96.21	16.45	79.76
MW-7	03/21/12	2.80	96.21	16.15	80.06
MW-7	09/28/12	2.10	96.21	16.34	79.87
MW-8	03/27/08	0.20	95.20	17.36	77.84
MW-8	06/12/08	NA	95.20	17.85	77.35

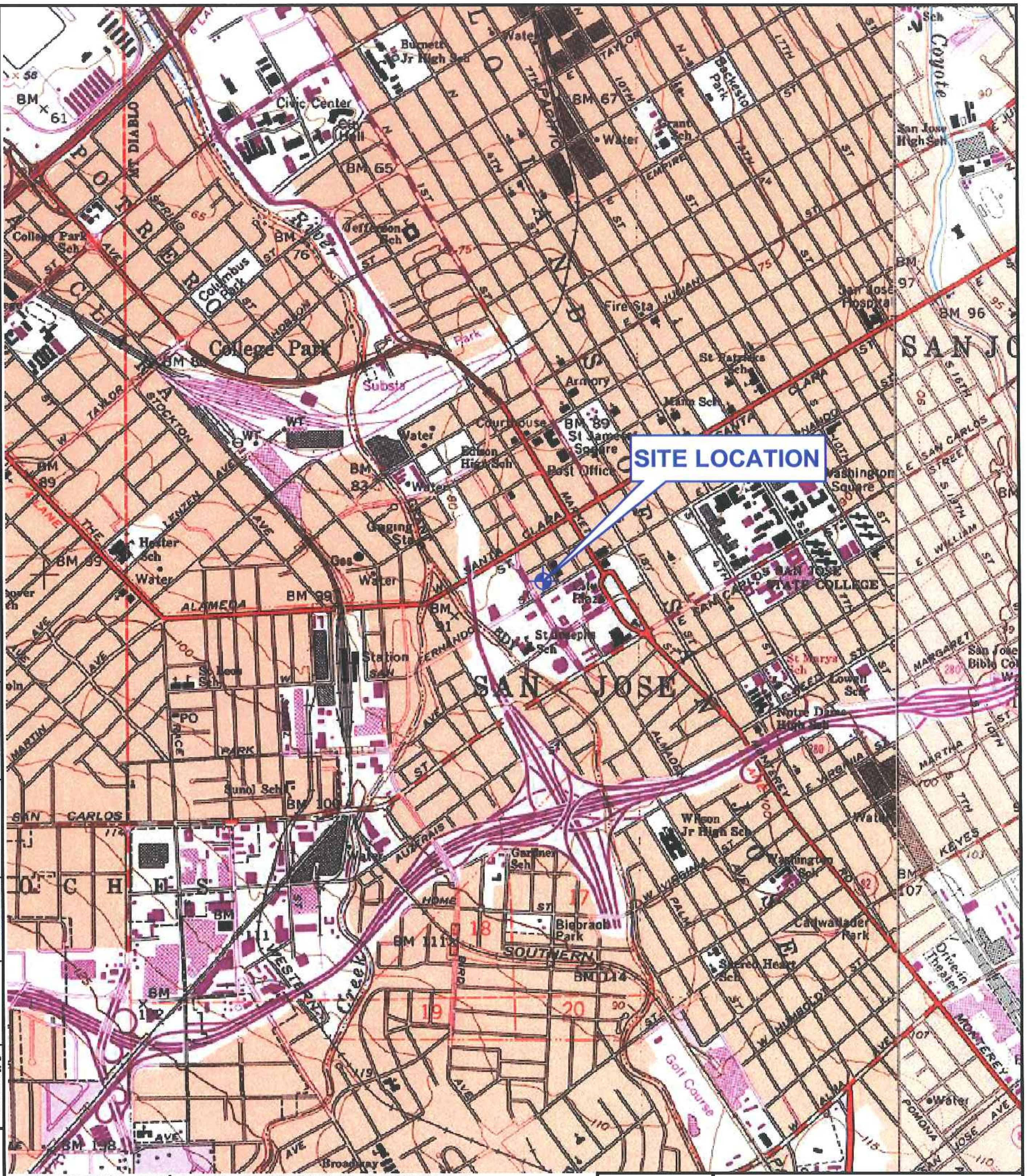
Table 1
Summary of Groundwater Measurements
AT&T Facility
95 South Almaden Avenue
San Jose, California

Monitoring Well Number	Date Measured	Dissolved Oxygen (in mg/L)	Well Casing Elevation (in feet above msl)	Depth to Groundwater (in feet)	Groundwater Elevation (in feet above msl)
MW-8	09/18/08	NA	95.20	18.72	76.48
MW-8	12/31/08	1.71	95.20	19.13	76.07
MW-8	03/25/09	0.72	95.20	18.16	77.04
MW-8	06/16/09	0.76	95.20	18.59	76.61
MW-8	09/09/09	2.60	95.20	19.13	76.07
MW-8	03/05/10	3.20	95.20	16.95	78.25
MW-8	09/17/10	1.32	95.20	17.49	77.71
MW-8	03/23/11	2.80	95.20	16.70	78.50
MW-8	09/27/11	2.10	95.20	16.82	78.38
MW-8	03/21/12	2.80	95.20	16.35	78.85
MW-8	09/28/12	2.40	95.20	16.43	78.77
MW-9	03/27/08	0.17	96.67	17.83	78.84
MW-9	06/12/08	NA	96.67	18.56	78.11
MW-9	09/18/08	NA	96.67	19.54	77.13
MW-9	12/31/08	2.34	96.67	20.07	76.60
MW-9	03/25/09	2.80	96.67	19.04	77.63
MW-9	06/16/09	1.21	96.67	19.28	77.39
MW-9	09/09/09	2.40	96.67	19.65	77.02
MW-9	03/05/10	3.10	96.67	17.45	79.22
MW-9	09/17/10	1.26	96.67	17.96	78.71
MW-9	03/23/11	3.20	96.67	16.70	79.97
MW-9	09/27/11	2.40	96.67	17.35	79.32
MW-9	03/21/12	2.60	96.67	16.80	79.87
MW-9	09/28/12	2.30	96.67	17.00	79.67

Notes:
msl - mean sea level
NA - not available
NM - not measured

FIGURES

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
almaden.jpg	---	Concord	SCHAEFFER	8/16/11	MS	8/16/11	RD	8/16/11	141450-A16



REFERENCE: 7.5' USGS TOPOGRAPHIC QUADRANGLE
OF: SAN JOSE WEST, CA., PHOTOREVISED: 1980;
SCALE = 1:24000

SCALE
0 2000 4000 FEET

Shaw

PREPARED FOR
AT&T
DALLAS, TEXAS

FIGURE 1
SITE VICINITY MAP
AT&T FACILITY
95 SOUTH ALMADEN AVENUE
SAN JOSE, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	Concord	SJZ 2/12/13	JP 2/12/13		146852-B7

S. ALMADEN AVE

POST STREET

WEST SAN FERNANDO STREET

MW-3

MW-2

MW-8

MW-7

MW-5

MW-9

MW-4

MW-1

MW-6

FUEL UST

FUEL UST

FUEL UST

"BLOCKHOUSE" SUPERVISOR'S BLDG. (1-STORY)

MAIN SITE BUILDING (9 STORIES)

LOADING DOCK

FORMER AT&T USTs (REMOVED 1992)

WORK PLAN ADDENDUM AREA

ALMADEN BOULEVARD

TRAFFIC ISLAND

LEGEND

MW-5 ● GROUNDWATER MONITORING WELL

TRUE NORTH

SITE NORTH

APPROXIMATE SCALE (FEET)

0 40 80

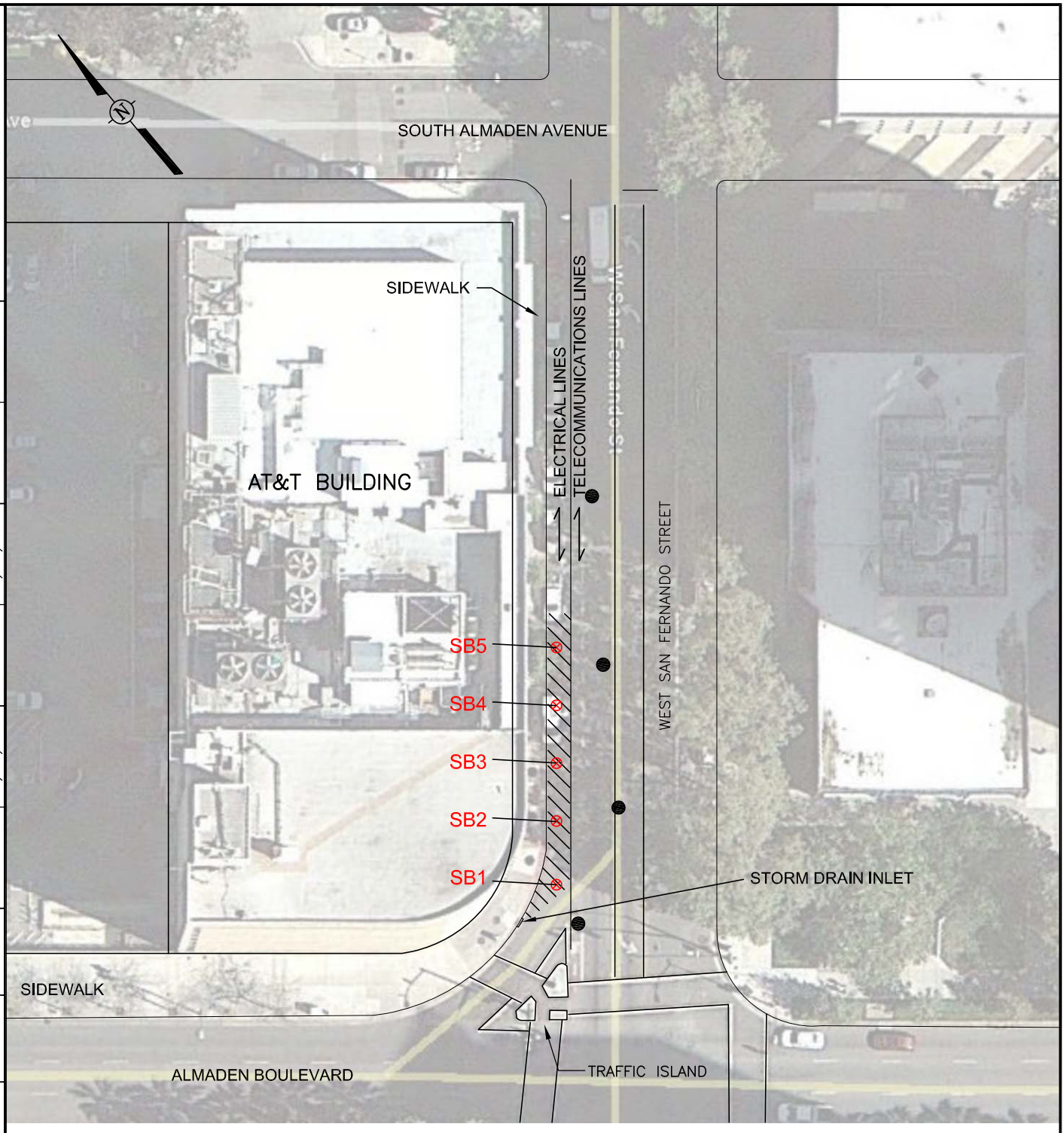
Shaw®

PREPARED FOR
AT&T
DALLAS, TEXAS

FIGURE 2
SITE PLAN

AT&T FACILITY
95 SOUTH ALMADEN AVENUE
SAN JOSE, CALIFORNIA

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY	DRAWING NUMBER
---	---	Concord	SJZ	2/12/13	JP	2/12/13		146852-A10



LEGEND

- PROPOSED SOIL BORING LOCATION
- FORMER SOIL BORING LOCATION
- UTILITY LOCATION
- POOLED DIESEL FUEL OCTOBER 2010

APPROXIMATE SCALE

0 50 100 FEET

Shaw®

PREPARED FOR
AT&T
DALLAS, TEXAS

FIGURE 3
PROPOSED SOIL BORING LOCATIONS

AT&T FACILITY
95 SOUTH ALMADEN AVENUE
SAN JOSE, CALIFORNIA

APPENDIX A

Letters from the CSCDEH

County of Santa Clara

Department of Environmental Health

1555 Berger Drive, Suite 300
San Jose, California 95112-2716
(408) 918-3400
www.EHinfo.org

January 3, 2013

Mr. Mark Smith
AT&T Services, Inc.
308 South Akard Street, Room 1700
Dallas, Texas 75202-5399

Subject: Fuel Leak Investigation, Pacific Bell, 95 South Almaden Avenue, San Jose, CA;
Case No. 14-281, SCVWDID No. 07S1E08N03f

Dear Mr. Smith:

The Department of Environmental Health (DEH) has reviewed the *Work Plan for Soil-Vapor Survey and Off-Site Monitoring Well Installation* submitted by Shaw Environmental Inc. (Shaw) and dated December 19, 2012.

As mentioned in the DEH's October 18 and December 12, 2012 letters, you are required to perform additional investigation to fully delineate the nature and extent of contamination associated with the October 2010 diesel spill near San Fernando Street and Almaden Boulevard. Elevated soil contamination was previously reported in this area as well as shallow subsurface utilities. In order to be protective of utility workers and determine if these utilities have created a lateral conduit for migration, you are required to define contamination in this area. No scope of work was included in this work plan to address this requirement. Please submit an addendum to this work plan which includes a scope of work to define the extent of contamination in both soil and groundwater near borings SB-1 through SB-5.

TECHNICAL REPORT REQUEST

Please submit the following document to the DEH (Attention: Mr. Aaron Costa), according to the following schedule:

Work Plan Addendum for Additional Site Assessment **February 15, 2013**

This technical report is requested pursuant to our authority under Sections 25289 and 25296.10 of the California Health and Safety Code. Each report, including Quarterly Groundwater Monitoring Reports, shall include conclusions and recommendations for the next phases of work required to protect water resources, human health and safety, and the environment at the site. We request that all required work be performed in a prompt and timely manner. Revisions to the

proposed schedule shall be requested at least two weeks prior to the due date in writing with appropriate justification for the anticipated delays.

The California Business and Professions Code (Sections 6735, 7835, and 7835.1) require that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments must be performed under the direction of an appropriately registered or certified professional.

PERJURY STATEMENT

All proposals and reports submitted to this office must be accompanied by a cover letter from the responsible party which states, at a minimum, the following:

> "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge."

This letter must be signed by an officer or legally authorized representative of your company. Future submittals made without the perjury statement may be returned as insufficient, which could affect your eligibility for reimbursement from the State Cleanup Fund. Please note that further delays in investigation, late reports, or enforcement actions may also result in your becoming ineligible to receive grant money from the California State Cleanup Fund (SB2004) to reimburse you for the cost of the cleanup.

If you have any questions, please feel free to contact me at (408) 918-1954 or via email.

Sincerely,

Aaron Costa
Hazardous Materials Specialist II
Local Oversight Program
aaron.costa@deh.sccgov.org

cc: Rob Delnagro, Project Manager, Shaw Environmental, Inc. (Rob.Delnagro@shawgrp.com)
File

County of Santa Clara

Department of Environmental Health

1555 Berger Drive, Suite 300
San Jose, California 95112-2716
(408) 918-3400
www.EHinfo.org

December 12, 2012

Mr. Mark Smith
AT&T Services, Inc.
308 South Akard Street, Room 1700
Dallas, Texas 75202-5399

Subject: Fuel Leak Investigation, Pacific Bell, 95 South Almaden Avenue, San Jose, CA; Case No. 14-281, SCVWDID No. 07S1E08N03f

Dear Mr. Smith:

The Department of Environmental Health (DEH) has reviewed the *Technical Response to DEH Letter of October 18, 2012* (letter) submitted by Shaw Environmental Inc. (Shaw) and dated November 30, 2012. This letter provided technical justification for not implementing a remedial excavation as proposed in the 2008 Corrective Action Plan (CAP). The letter also requests to defer remediation and only perform semi-annual groundwater monitoring until the existing underground storage tank (UST) system is removed and the City of San Jose reconfigures the adjacent streets. The DEH does not approve of these requests and requires you to perform additional work in order to move your case towards closure.

TECHNICAL COMMENTS

- Shaw provided information based on the most recent investigation that showed contamination was deeper and more widespread than previously thought in 2008. Due to the broader extent of contamination discovered, remedial excavation is much less feasible. Although the DEH agrees that the feasibility of excavation is limited based on the new data collected, you have not proposed a remedial alternative to remove contamination and clean-up your site to acceptable levels.
- Significant free product remains at your site and is required to be removed prior to evaluating your case for closure. You will be required to submit a revised CAP once contamination is fully defined.
- As outlined in the DEH's October 18, 2012 directive letter, the extent of contamination across your site, not only in the area of the October 2010 diesel spill, remains undefined. Additional monitoring wells are required to define the extent of contamination which extends off-site.
- A work plan is required to define the extent of contamination across the site as a whole, and is currently due on December 21, 2012.
- Although Shaw has provided some technical evidence that some of the contamination

may have originated from operations not associated with AT&T, they have been unable to locate any definitive data showing that there was a separate release from USTs in operation prior to AT&T's operations. Without this definitive data, the DEH cannot pursue additional responsible parties in this case. You are responsible for investigating and cleaning up all contamination emanating from your site.

- Based on a report entitled *Status Report of Initial Site Assessment* submitted by IT Corporation dated July 30, 1992, a geotechnical boring associated with the installation of new USTs led to the initial discovery of a leak. Soil sampling performed in 1991 showed that soil was impacted with diesel fuel at depths between 15 and 20 feet below ground surface (bgs) in an area directly north of the five former 10,000 gallon diesel tanks operated by AT&T. This report was submitted with incomplete information as there appears to be both text and figures missing from the document. The DEH is requesting that the full version of this report be re-submitted for our records.
- Based on information provided to the DEH, the AT&T USTs began operation in the mid-1960's. Since the leak was not discovered through UST monitoring equipment or inventory loss, it is possible that the former AT&T USTs could have been leaking for many years prior to the discovery of contamination in 1991.
- Shaw states that they do not believe that the underlying, heavy-end hydrocarbons located at depth pose a significant risk to human health; however a formal risk assessment has not been presented to the DEH.

TECHNICAL REPORT REQUEST

Please submit the following documents to the DEH (Attention: Mr. Aaron Costa), according to the following schedule:

Complete Status Report of Initial Site Assessment **February 15, 2013**

This technical report is requested pursuant to our authority under Sections 25289 and 25296.10 of the California Health and Safety Code. Each report, including Quarterly Groundwater Monitoring Reports, shall include conclusions and recommendations for the next phases of work required to protect water resources, human health and safety, and the environment at the site. We request that all required work be performed in a prompt and timely manner. Revisions to the proposed schedule shall be requested at least two weeks prior to the due date in writing with appropriate justification for the anticipated delays.

The California Business and Professions Code (Sections 6735, 7835, and 7835.1) require that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments must be performed under the direction of an appropriately registered or certified professional.

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If you have any questions, please feel free to contact me at (408) 918-1954 or via email.

Sincerely,

Aaron Costa
Hazardous Materials Specialist II
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aaron.costa@deh.sccgov.org

cc: Rob Delnagro, Project Manager, Shaw Environmental, Inc. (Rob.Delnagro@shawgrp.com)
File