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April 13, 2010 Project No. 183402024

Mr. Gerard Martorano
The Wine Country Gateway Recreational Vehicle Park, LLC,
6040 S. Durango Drive
Las Vegas, NV 89113

Subject: **Evaluation of Remedial Progress and Environmental Risk Reduction San-Paso Truck and Auto, 81 Wellsona Road, Paso Robles**

Reference: **Response to Comments: 81 Wellsona Road, Paso Robles, San Luis Obispo County; Underground Storage Tank Case #830, Letter by Regional Water Quality Control Board dated March 17, 2010**

Dear Mr. Martorano:

Stantec Consulting Corporation (Stantec) has reviewed the above-referenced letter from the California Regional Water Quality Control Board (RWQCB) and provides the following comments regarding remedial progress at the site and rationale for classifying the site as a low risk candidate for regulatory closure.

Site Characterization and Ranking

According to reports reviewed by Stantec, soil and groundwater contamination were first discovered at the site during the removal of underground storage tanks (UST) in 1990. Contaminated soil was removed from beneath the USTs to the extent practicable in 1990 and subsequent investigations included advancement of soil borings and installation of groundwater monitoring wells to evaluate the extent of impacts and characterize groundwater conditions beneath the site. An early investigation described a perched water-bearing zone at a depth of approximately 25 feet bgs in the area of the former USTs. Several of the borings drilled to evaluate the lateral extent of soil and groundwater impacts were reportedly dry. From these findings, previous geologic consultants concluded that the saturated zone may be discontinuous and limited in lateral extent. If correct, these hydrogeologic conditions could limit the potential threat of the identified contamination to surrounding properties and nearby domestic water wells, if present.

Stantec assumed primary consultant responsibilities for the site in 2007 and after evaluating the residual hydrocarbon concentrations in groundwater, proposed a treatability study using hydrogen peroxide. Groundwater samples collected from the five original monitoring wells by Stantec in January 2009, prior to initiation of the treatability study, indicated a maximum benzene concentration of 4.6 parts per billion and no detectable methyl-tert-butyl-ether (MTBE). These low concentrations suggested that only a modest treatment effort would be needed to reduce hydrocarbon concentrations to levels conducive to regulatory closure.

Groundwater Treatment and Post-Treatment Monitoring

The initial treatability study commenced in March 2009 and was followed by an expanded phase of treatment performed between July and October 2009. Post-treatment monitoring conducted in November 2009 indicated that total petroleum hydrocarbon (TPH) concentrations were below cleanup goals in all wells at the site and that benzene was not detected in 5 of the 8 wells. The maximum benzene reading in November 2009 was 3.6 parts per billion (ppb), only slightly greater than the cleanup goal of 1.0 ppb for benzene. The most recent post-treatment monitoring data obtained in February 2010 indicated diesel hydrocarbons (TPHd) exceeding the cleanup goal in one well and a maximum reported benzene concentration of 2.1 ppb. MTBE has not been detected in any of the post-treatment monitoring samples.

The following considerations support the conclusion that current post-treatment monitoring data are reliable indicators of remedial progress at the site:

- Initial pre-treatment hydrocarbon concentrations were relatively low, suggesting that short-term treatment would be capable of reducing concentrations to acceptable levels. Given the relatively low starting concentrations, significant rebound in current post-treatment hydrocarbon concentrations is not expected.
- Winter rains commenced as early as October 2009 and significant rainfall occurred between the completion of treatment activities in late October 2009 and the most recent monitoring event in February 2009. Despite the seasonal precipitation received, post-treatment contaminant levels remained low, suggesting that a complete hydrologic cycle (one year of post-treatment monitoring) may not be necessary to evaluate treatment effectiveness at this site.
- Because hydrogen peroxide is a strong oxidizer, monitoring dissolved oxygen concentrations in groundwater is used to evaluate the persistence of oxidizing conditions following treatment. Background levels of dissolved oxygen (DO) measured prior to the treatability study ranged from 0.2 to 2.0 parts per million (ppm) in the monitoring wells. In response to hydrogen peroxide infiltration, DO concentrations increased to greater than 20 ppm and remained elevated for up to two weeks following treatment. During the most recent post-treatment monitoring event conducted in February 2009, DO readings averaged 2.4 ppm in groundwater. The return of DO levels to near background readings in the wells suggests that no residual effects of hydrogen peroxide are influencing the current post-treatment hydrocarbon results. Thus, the current analytical results are considered representative of actual aquifer conditions.

Potential Threat to Drinking Water Wells

The nearest drinking water or domestic supply well is located onsite, to the west of the former USTs. This well serves the café on the property. Stantec collected a sample from the supply well on February 19, 2010 as part of the first quarter 2010 monitoring event. The results confirmed that no hydrocarbon constituents, including benzene and MTBE, were detected in the sample.

Need for Confirmation Soil Borings or Additional Assessment

During a source area assessment conducted in August 2008, Stantec advanced three soil borings in the location of the former USTs removed in 1990. Hydrocarbon concentrations in the soil samples analyzed from the borings were either below detection limits or where reported, were below cleanup goals. No further confirmation soil borings in the former UST area at the site appear to be warranted.

Hydrocarbon concentrations measured during groundwater monitoring events prior to groundwater treatment in 2009 indicated that the lateral extent of groundwater contamination was not fully defined. However, previous site assessment activities found that several of the borings drilled to evaluate the lateral extent of groundwater impacts were dry; leading previous consultants to conclude that groundwater beneath the site represented a perched zone of limited lateral extent. Regardless of the actual subsurface conditions, current groundwater monitoring results indicate that hydrocarbon concentrations in groundwater are mostly below, or only slightly above RWQCB cleanup levels. Given the current post-treatment hydrocarbon levels in the wells, additional groundwater assessment is not considered a significant data gap with respect to site cleanup.

In summary, review of the data obtained to date indicates that the subject site is a low risk UST site and that current soil and groundwater conditions are conducive to regulatory closure.

It is hoped that this additional information will be of assistance. Thank you for this opportunity to be of service. Should you have any questions, please do not hesitate to contact me at (805) 546-0455.

Sincerely,

Stantec Consulting Corporation

Steve Little, PG, CHG.
Senior Hydrogeologist