



# GREGORY VILLAGE PARTNERS, L.P.

940 Emmett Avenue Suite 200 Belmont, CA 94002

---

9 September 2014

Mr. Bruce Wolfe  
Executive Officer  
San Francisco Bay Region -  
Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 940612

Re: Request for Reduction in Groundwater Monitoring Frequency  
and Tentative Order - Initial Site Clean Up  
1601-1699 Contra Costa Boulevard, Pleasant Hill, California  
(Former P&K Cleaners) Regional Board File No. 07S0132

Dear Mr. Wolfe:

Gregory Village Partners, L.P. ("Gregory Village") submits this request for approval of a reduction in the frequency of sample collection at seven existing groundwater monitoring wells that are part of ongoing groundwater monitoring activities performed at the property located at 1601-1699 Contra Costa Boulevard, Pleasant Hill, California (the "Site"). This request is also a comment on the monitoring requirements set forth in the tentative order for the site.

## **Current Groundwater Monitoring Program**

Groundwater monitoring at the Site began in 1999 with construction and sampling of groundwater at wells MW-1, MW-2, and MW-3. Additional monitoring wells were constructed in 2004 (MW-4, MW-5, and MW-6), 2006 (MW-7 and MW-8), and 2007 (MW-9, MW-10, and MW-11) for a total of eleven wells that have been routinely monitored since they were constructed. Groundwater samples were collected quarterly from monitoring wells MW-3, MW-4, and MW-7 through MW-11 until 2013, since which time they have been sampled semi-annually. At wells MW-1, MW-2, MW-5, and MW-6, samples are collected annually during the third quarter (samples were collected quarterly before 2008). The depth of groundwater was measured quarterly at all wells until 2013, since which time such measurements have been taken semi-annually. Groundwater samples are analyzed for volatile organic compounds ("VOCs") by U.S. EPA Method 8260B. In addition, once a year during the third quarter, groundwater samples have been analyzed for nitrate and sulfate by U.S. EPA Method 300.0, total alkalinity by SM2320B, ferrous iron by SM3500Fe-B, carbon dioxide, methane, ethane, and ethene by U.S. EPA Methods RSK-175, chloride by U.S. EPA Method 300.0, sulfide by SM4500S2-D, and total organic carbon by SM5310C (collectively, "Water Chemistry Constituents").



September 9, 2014  
Bruce Wolfe  
RWQCB - San Francisco Bay Region  
Page 2

### Request for Modification

Gregory Village proposes to reduce the frequency of sample collection and analysis from semi-annual. As summarized in Table 3 of EKI's Groundwater Monitoring Report - First Half 2014, dated 30 April 2014, samples have been collected from these wells and analyzed for VOC's since they were constructed. During that time, the concentrations of VOC's generally have been stable or declined. Based on these data, we believe that a reduction to annual sample collection is warranted in all wells that are currently being sampled semi-annually.

We request that the Regional Water Quality Control Board approve the following modifications to the groundwater monitoring program for the site:

- Modify the frequency for sample collection at the seven monitoring wells currently being monitored semi-annually to annually during the third quarter.
- Modify the constituents being sampled in all eleven wells to eliminate Water Chemistry Constituents.
- Modify the frequency for measurement of depth to groundwater at all eleven wells from semi-annual to annual.
- Modify the frequency for submission of monitoring reports from semi-annual to annual, with reports due one month after the end of the third quarters.

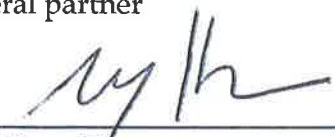
No other changes are proposed to the groundwater monitoring program for the Site.

We appreciate your consideration of this request. Please call if you have any questions.

Sincerely,

GREGORY VILLAGE PARTNERS, L.P.,  
a California limited partnership

By: VPI, Inc., a California corporation  
its general partner

By:   
Mary Haber, General Counsel

cc: Steve Miller (EKI)  
Ed Firestone, Esq.  
Kevin Brown (RWQCB)