CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER No. R2-2015-0012

ADOPTION OF SITE CLEANUP REQUIREMENTS for:

531-535 OAK, LLC, and
GOSS-JEWETT COMPANY OF NORTHERN CALIFORNIA

for the property located at:

416 BROWNING WAY
SOUTH SAN FRANCISCO, SAN MATEO COUNTY

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

1. **Site Location**: The former Goss-Jewett Company of Northern California (Goss-Jewett) facility is located at 416 Browning Way in the City of South San Francisco (the Site). The Site is located approximately 0.75 mile northwest of the intersection of highways 101 and 380 and is adjacent to the South San Francisco Centennial Trail where BART runs underground (Figure 1).

   The Site occupies approximately 0.67 acre at the northwest end of a cul-de sac in an industrial/commercial area. The nearest residences are located approximately 0.25 mile to the northwest. The onsite building is currently a single story office that was previously a warehouse used as a dry cleaning supply distribution business. The office building is surrounded to the southeast and northeast by parking areas paved with asphalt.

2. **Site History**: Goss-Jewett owned the Site from 1957 to 2011 and operated a dry cleaning supply distribution business from 1957 to 2000 at the Site. The company provided laundry chemicals, including detergents and spotting chemicals, packaging products such as hangers and polyethylene bags, and bulk deliveries of tetrachloroethene (PCE). The PCE was stored in a 4,100 gallon aboveground storage tank (AST) that was in the southwestern corner of the building. In 2000, the Site was leased to Pain Therapeutics, which converted the warehouse into office space. The Site is currently operated as B.I.A. Cordon Bleu, a wholesale manufacturer and distributor of porcelain and stoneware, bakeware, and dinnerware.

   There were no reported spills or releases from the Site during Goss-Jewett's operations. There has been no known use of chlorinated solvents at the Site since Goss-Jewett ceased operations in 2000.

   The initial investigation of the Site was conducted by Geomatrix on behalf of Goss-Jewett in response to a directive from the Regional Water Board dated May 14, 2007. The Regional Water Board was overseeing the investigation of the release of volatile organic compounds (VOCs) in the vicinity of the neighboring property located at 290 South Maple Avenue, which is adjacent and east of the Site. Since the Site was previously a dry cleaning supply distribution business, and it is located up-gradient and cross-gradient of 290 South Maple Avenue, the Regional Water Board directed Goss-Jewett to investigate the Site for the presence of VOCs.

The results of the initial investigation conducted in 2007 confirmed the presence of highly-elevated concentrations of VOCs, including PCE and its breakdown products, at the Site. The results of additional investigations have confirmed the presence of highly-elevated concentrations of VOCs in soil and groundwater samples collected in the southwestern portion (former AST area) and the northeastern portion of the Site.

3. **Named Dischargers**: Goss-Jewett is named as a discharger because of substantial evidence that it discharged pollutants to soil and groundwater at the Site. Goss-Jewett stored and handled PCE during its operations at the Site. No other uses of chlorinated solvents occurred at the Site after Goss-Jewett ceased operations. PCE is found in soil and groundwater in the immediate vicinity and down-gradient of the former AST. Goss-Jewett is also named as a discharger because it owned the Site during the period when the discharge occurred, had knowledge of the activities that caused the discharge, and had the legal ability to control the discharge.

   531-535 OAK, LLC, is named as a discharger because it is the current owner of the Site on which there is an ongoing discharge of pollutants, it has knowledge of the discharge, and it has the legal ability to control the discharge.

   Goss-Jewett and 531-535 OAK, LLC, are collectively referred to as "Dischargers" in this Order.

   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 Regional Water Board will consider adding those parties' names to this order.

4. **Regulatory Status**: This Site is currently not subject to any Regional Water Board order under California Water Code (CWC) section 13304; however, the Site has been subject to multiple CWC section 13267 directives since May 2007.

5. **Site Hydrogeology**: The Site is within the Colma Creek watershed and the South Westside Groundwater Basin of the San Francisco Bay Hydrologic Region. Soils encountered in the upper 20 to 25 feet below ground surface (bgs) consist of sand and silty sand with thin clayey, sandy silt, and gravelly lenses (Zone A). A finer-grained unit of predominantly clayey silt, sandy silt, and silty sand extends to approximately 50 feet bgs. Between approximately 50 feet bgs to approximately 82 feet bgs, the soils are described as coarse-grained interbedded sands, gravels, and silty sands (Zone B).

   Depth to unconfined groundwater in the Zone A varies from 5 to 11 feet bgs, and the flow direction has been reported to range from northwest to east with the prevailing direction to north-northeast with a hydraulic gradient of approximately 0.006 ft/ft. Similarly, offsite to the north and east, the groundwater flow direction has been reported to range from north-northwest to east with a hydraulic gradient ranging from 0.0015 to 0.007 ft/ft. The Zone B is semi-confined or confined. Groundwater recharge in the area occurs by surface infiltration in unpaved areas, and groundwater flows northeastward beneath the Site toward the San Francisco Bay.

6. **Remedial Investigation**: The investigation at the Site began in November 2007 when an investigation of a separate release of VOCs at a neighboring site at 290 South Maple Avenue identified the Site as a possible source or a contributor to the neighbor's contamination. Several onsite and offsite investigations have occurred since VOCs were first detected at the Site. The results of the onsite investigations have confirmed the presence of PCE, and its breakdown products trichloroethene (TCE) and cis-1,2-dichloroethene (DCE), in groundwater, soil, and soil gas, with the highest concentrations in the former AST area and along the northeast side of the building.

The maximum detected concentrations of contaminants of potential concern are listed by medium in the table below:

Analytes	Groundwater (µg/L)	Soil (mg/kg)	Soil Gas (µg/m^3)
PCE	220,000	15,000	25,000,000
TCE	1,740	0.30	1,600,000
DCE	1,100	0.31	450,000
Vinyl chloride (VC)	ND < 0.5	ND < 0.005	ND < 36,000

ND = not detected at concentrations above the reporting limit shown

Groundwater investigation: Six shallow monitoring wells have been installed onsite and four wells offsite. The data collected from these wells has shown that the lateral extent of the groundwater VOC contamination has expanded northeast to the eastern corner of the 245 Spruce Avenue property and east to the 290 and 272 South Maple Avenue properties. Currently, the lateral extent of VOC contamination in shallow groundwater (Zone A) has not been delineated.

The results of the 2010 Site investigation, which included the advancement of Cone Penetrometer Testing and Membrane Interface Probe (CPT/MIP) borings, confirmed the presence of PCE in deeper groundwater (Zone B) up to 52 µg/L at 82 feet bgs (Source Group, Inc., September 2010). The vertical extent of VOC contamination in groundwater has not been delineated.

Soil and soil gas investigation: Soils samples collected during the initial investigation conducted in 2007 contained highly elevated concentrations of VOCs, including PCE at concentrations up to 49 mg/kg. Soils samples have been collected during the installation of the monitoring wells installed at the Site. Concentrations exceeding the Regional Water Board's Environmental Screening Level (ESL) of 0.7 mg/kg were detected in soil samples from all of the monitoring wells installed in 2009 by the Source Group, Inc., and in 2014 by KCE Matrix. The results of the additional investigation conducted in March 2014 have confirmed that highly-elevated concentrations of PCE are still present in soils at the Site. The maximum concentration of PCE at15,000 mg/kg was detected in a soil sample collected from 2 feet bgs from boring EB-3 located downgradient of the former AST. Soil gas samples collected during the 2007 investigation contained elevated concentrations of VOCs, including PCE and TCE at concentrations exceeding the commercial ESL of 2,100 µg/m^3 and 3,000 µg/m^3, respectively. Currently, the lateral extent of VOC contamination in shallow soil and soil gas has not been delineated.

7. **Interim Remedial Measures**: No remedial action to reduce the threat to water quality, public health, and the environment posed by the discharge of waste has been implemented at the Site. Interim remedial measures need to be implemented at the 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.

8. **Adjacent Sites**: There are three regulated sites located near the Site:

   a. 290 South Maple Avenue site: This site is located east and adjacent to the Site. A commercial laundry facility has been operating at this site since 1958. PCE was used at the site until 1993. Current laundry cleaning operations involve water-based cleaning. Two underground storage tanks (USTs), one diesel and one fuel oil, were located outside the southeast and northeast corners of the site's building, respectively, until their removal in 1987. However, the primary chemicals of concern for the site are VOCs due to past dry-cleaning operations onsite as well as contaminants that may have migrated downgradient in groundwater from the 416 Browning Way site. The groundwater flow direction has ranged from northwest to east, with the predominant flow direction to the northeast. The release of VOCs at 290 South Maple Avenue may be commingled with the release from the 416 Browning Way site.

   b. Pellegrini Bros Wines Inc. site: This site at 272 South Maple Avenue is a leaking UST case regulated by the San Mateo County Environmental Health Department. The site operates as a wine distribution facility and a storage facility for a laundry supply business. During the removal of three USTs in 1995, petroleum hydrocarbon contamination was detected in soil and groundwater at the site. Soil excavation was conducted as part of the remedial action in 1999. The primary chemicals of concern for the site were total petroleum hydrocarbons as gasoline, benzene, toluene, ethylbenzene, and xylenes. Groundwater in the western part of the site is also impacted by VOCs potentially originating from two up-gradient offsite sources: the sites at 290 South Maple Avenue and 416 Browning Way.

   c. Zellerbach Paper Co. site: This site at 245 Spruce Avenue is a leaking UST case regulated by the San Mateo County Environmental Health Department. Petroleum hydrocarbon contamination was detected during the removal of three USTs at the site in 1986. Soil excavation was conducted at the site in 1991. The UST case was closed in October 2001. Groundwater in the southern part of the site has been impacted by VOCs originating from the sites at 290 South Maple Avenue and 416 Browning Way.

9. **Basin Plan**: The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law, and U.S. EPA, where required.

   The potential beneficial uses of groundwater underlying and adjacent to the Site include:

a. Municipal and domestic water supply
b. Industrial process water supply
c. Industrial service water supply

Three groundwater production well facilities in the South Westside Groundwater Basin, owned by the San Francisco Public Utilities Commission's Regional Groundwater Storage and Recovery Project, are located near the Site. One well is located approximately 0.2 mile northwest of the Site, and two additional wells are located approximately 0.4 and 0.6 mile southwest of the Site.

Colma Creek is located approximately 0.5 mile north of the Site. The existing and potential beneficial uses of Colma Creek include:

a. Water contact recreation
b. Water non-contact recreation
c. Wildlife habitat
d. Warm freshwater habitat

10. **Other Regional Water Board Policies**: Regional Water 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.

Regional Water 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.

11. **State Water Board Policies**: State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to this discharge. It requires maintenance of background levels of water quality unless a lesser water quality is consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses, and will not result in exceedance of applicable water quality objectives This Order and its requirements are consistent with Resolution No. 68-16.

State Water 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. It directs the Regional Water Boards to set cleanup levels equal to background water quality or the best water quality which is reasonable, if background levels 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. The remedial action plan will assess the feasibility of attaining background levels of water quality. This Order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

12. **Preliminary Cleanup Goals**: Pending the establishment of site-specific cleanup levels, preliminary cleanup goals are needed for the purpose of conducting remedial investigation and

interim remedial actions. These goals are required to address all relevant media (e.g., groundwater, soil, and soil gas) and all relevant exposure pathways and concerns (e.g., groundwater ingestion, migration of groundwater to surface waters, and vapor intrusion).

13. **Basis for 13304 Order**: CWC section 13304 authorizes the Regional Water Board to issue orders requiring the Dischargers to cleanup and abate waste where 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.

14. **Cost Recovery**: Pursuant to CWC section 13304, the Dischargers are hereby notified that the Regional Water Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Regional Water 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.

15. **California Safe Drinking Water Policy:** It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This Order promotes that policy by requiring discharges to be remediated such that maximum contaminant levels (designed to protect human health and ensure that water is safe for domestic use) are met in existing and future supply wells.

16. **CEQA**: This action is an order to enforce the laws and regulations administered by the Regional Water 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.

17. **Notification**: The Regional Water Board has notified the Dischargers and all interested agencies and persons of its intent under CWC section 13304 to prescribe site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

18. **Public Hearing**: The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to CWC sections 13304 and 13267, 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 that 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 that will cause significant adverse migration of wastes or hazardous substances are prohibited.

B. **PRELIMINARY CLEANUP GOALS**

The following preliminary cleanup goals shall be used to guide remedial investigation and interim remedial actions, pending establishment of site-specific cleanup levels:

1. Groundwater: Applicable screening levels such as the Regional Water Board's ESLs. Groundwater screening levels shall be protective of receptors for the following exposure pathways: groundwater ingestion and vapor intrusion to indoor air. For groundwater ingestion, use applicable water quality objectives [e.g., lower of primary and secondary maximum contaminant levels (MCLs)]: in the absence of a chemical-specific objective, use equivalent drinking water levels based on toxicity and taste and odor concerns.

2. Soil: Applicable screening levels such as the Regional Water Board's ESLs. Soil screening levels shall be protective of receptors for a full range of exposure pathways, including direct exposure, nuisance, and leaching to groundwater. For purposes of this subsection, the Dischargers shall assume that groundwater is a potential source of drinking water.

3. Soil gas: Applicable screening levels such as the Regional Water Board's ESLs. Soil gas screening levels shall be protective of receptors for the vapor intrusion to indoor air pathway.

C. **TASKS**

1. **INTERIM REMEDIAL ACTION WORKPLAN**

COMPLIANCE DATE: May 31, 2015

Submit a workplan acceptable to the Executive Officer to evaluate interim remedial action alternatives and to recommend one or more alternatives for implementation to prevent further contaminant migration from the source area in the vicinity of the former AST and in the northeastern portion of the Site. The workplan shall specify a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently.

2. **COMPLETION OF INTERIM REMEDIAL ACTIONS**

COMPLIANCE DATE: 150 days after Executive Officer approval of Task 1 workplan

The Dischargers shall complete interim remedial actions and submit a technical report documenting compliance by the compliance date above. Specifically, the Dischargers shall submit a technical report acceptable to the Executive Officer documenting completion of the tasks identified in the Task 1 workplan. For ongoing actions, such as soil vapor extraction or groundwater extraction, the report shall document startup as opposed to completion.

3. **REMEDIAL INVESTIGATION WORKPLAN**

COMPLIANCE DATE: June 30, 2015

Submit a workplan acceptable to the Executive Officer to define the vertical and lateral extent of soil and groundwater pollution. The workplan shall specify investigation methods and a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently, provided that this does not delay compliance.

4. **COMPLETION OF REMEDIAL INVESTIGATION**

COMPLIANCE DATE: 90 days after Executive Officer approval of Task 3 workplan

The Dischargers shall complete the remedial investigation and submit a technical report documenting compliance by the compliance date above. Specifically, the Dischargers shall submit a technical report acceptable to the Executive Officer documenting completion of the tasks identified in the Task 3 workplan. The technical report shall define the vertical and lateral extent of pollution down to concentrations at or below typical cleanup levels for soil and groundwater. The report shall document the extent of the offsite groundwater plume that originates at the Site.

5. **RISK ASSESSMENT WORKPLAN**

COMPLIANCE DATE: 90 days after Executive Officer approval of Task 3 workplan

Submit a workplan acceptable to the Executive Officer for preparation of either a screening level evaluation or a site-specific risk assessment. The workplan shall include a conceptual site model (i.e., identify pathways and receptors where Site contaminants pose a potential threat to human health or the environment). If a screening level evaluation is selected, the workplan shall identify which screening levels will be used and demonstrate that they address all relevant pathways and receptors for the Site.

6. **COMPLETION OF RISK ASSESSMENT**

COMPLIANCE DATE: 60 days after Executive Officer approval of Task 5 workplan

The Dischargers shall complete the risk assessment and submit a technical report documenting compliance by the compliance date above. Specifically, the Dischargers shall submit a technical report acceptable to the Executive Officer documenting completion of the tasks identified in the Task 5 workplan. The report shall include either a screening level evaluation or a site-specific risk assessment. The results of this report will help establish acceptable exposure levels, to be used in developing remedial alternatives required by Task 7 below.

7. **REMEDIAL ACTION PLAN INCLUDING DRAFT CLEANUP LEVELS**

COMPLIANCE DATE: 60 days after Executive Officer approval of Task 6 technical report

Submit a remedial action plan acceptable to the Executive Officer containing:

a. Summary of remedial investigation
b. Summary of risk assessment
c. Evaluation of the installed interim remedial actions
d. Feasibility study evaluating alternative final remedial actions
e. Recommended final remedial actions and cleanup levels
f. Implementation tasks and time schedule

The remedial action plan shall propose remedial work that has a high probability of eliminating unacceptable threats to human health and restoring beneficial uses of water in a reasonable time, with “reasonable time” based on the severity of impact to the beneficial use (for current impacts) or the time before the beneficial use will occur (for potential future impacts). The Dischargers are encouraged to coordinate groundwater remediation action plans with parties at the down-gradient 290 South Maple Avenue site, given the commingling of the groundwater contamination plumes from the two sites.

Task 7’s item d shall include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Task 7’s items a through d shall be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 C.F.R. § 300), CERCLA guidance documents with respect to remedial investigations and feasibility studies, Health and Safety Code section 25356.1(c), and State Water Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304").

Task 7's item e shall consider the preliminary cleanup goals for soil and groundwater identified in finding 12 and shall address the attainability of background levels of water quality (see finding 11).

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 Regional Water Board or Executive Officer 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 CWC section 13050(m).

2. **Good Operation and Maintenance**: 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 CWC section 13304, to the Regional Water Board for all reasonable costs actually incurred by the Regional Water 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 is enrolled in a State Water 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 CWC section 13267(c), the Dischargers shall permit the Regional Water 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 Regional Water Board using approved U.S. EPA methods for the type of analysis to be performed. Quality assurance/quality control (QA/QC) records shall be maintained for Regional Water Board review. This provision does not apply to analyses that can only reasonably be performed onsite (e.g., temperature).

8. **Document Distribution**: An electronic and paper version of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the Regional Water Board, and electronic copies shall be provided to the following agencies:

   a. San Francisco Public Utilities Commission
   b. San Mateo County Environmental Health Department

   The Executive Officer may modify this distribution list as needed.

   Electronic copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be uploaded to the State Water Board's GeoTracker database within five business days after submittal to the Regional Water Board. Guidance for electronic information submittal is available at: http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

9. **Reporting of Changed Owner or Operator**: The Dischargers shall file a technical report on any changes in contact information, site occupancy, or ownership associated with the Site 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 Water Board by calling (510) 622-2369.

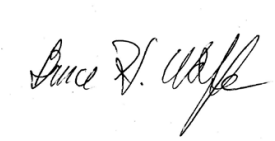
    A written report shall be filed with the Regional Water Board within five working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or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

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

11. **Periodic SCR Review**: The Regional Water Board will review this Order periodically and may revise it when necessary. The Dischargers may request revisions and upon

review the Executive Officer may recommend that the Regional Water Board revise these requirements.

I, Bruce H. Wolfe, 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 February 11, 2015.



Digitally signed by Bruce H. Wolfe
DN: cn=Bruce H. Wolfe, o=SWRCB, ou=Region 2, email=bwolfe@waterboards.ca.gov, c=US
Date: 2015.02.18 14:46:18 -08'00'

Bruce H. Wolfe
Executive Officer

==========

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

==========

Attachments: Figure 1 - Site Map
Self-Monitoring Program

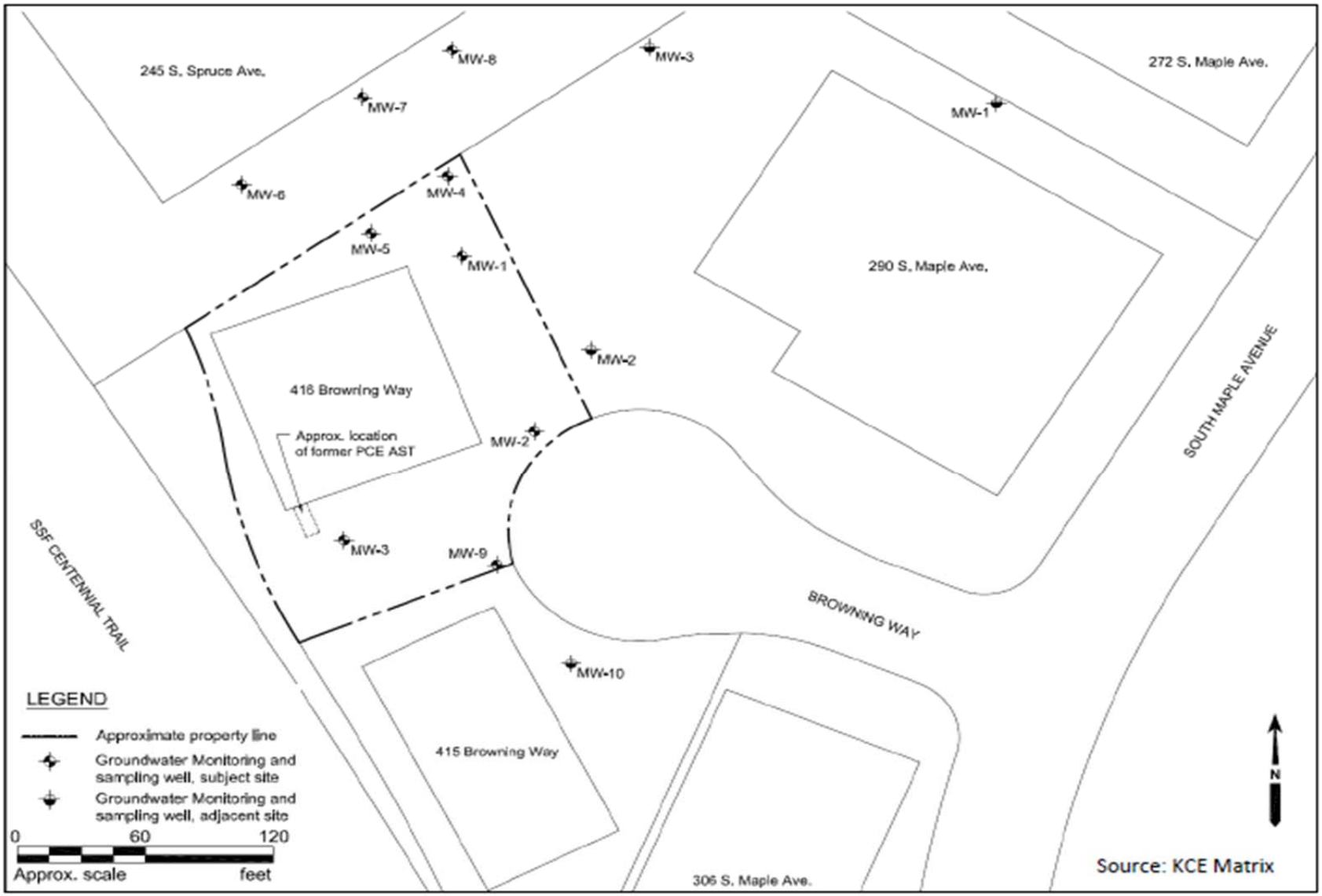


Figure 1 – Site Map

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM for:

531-535 OAK, LLC, and
GOSS-JEWETT COMPANY OF NORTHERN CALIFORNIA

for the property located at:

416 BROWNING WAY
SOUTH SAN FRANCISCO, SAN MATEO COUNTY

1. **Authority and Purpose**: The Regional Water Board requests the technical reports required in this Self-Monitoring Program pursuant to CWC sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Regional Water Board Order No. R2-2015-0012 (site cleanup requirements).

2. **Monitoring**: The Dischargers shall measure groundwater elevations quarterly in all monitoring wells, and shall collect and analyze representative samples of groundwater according to the following schedule:

Well #	Sampling Frequency	Analyses	Well #	Sampling Frequency	Analyses
MW-1	SA/Q[1]	8260B	MW-6	SA	8260B
MW-2	SA/Q[1]	8260B	MW-7	SA	8260B
MW-3	SA/Q[1]	8260B	MW-8	SA	8260B
MW-4	SA/Q[1]	8260B	MW-9	SA	8260B
MW-5	SA/Q[1]	8260B	MW-10	A	8260B

Key: Q[1] = Quarterly after completion of Task 2, SA = Semi-Annually, A = Annually
8260B = U.S. EPA Method 8260B or equivalent

The Dischargers shall sample any new monitoring or extraction wells quarterly 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. **Quarterly Monitoring Reports**: The Dischargers shall submit quarterly monitoring reports to the Regional Water Board no later than 30 days following the end of the quarter (e.g., report for first quarter of the year due April 30). The first quarterly monitoring report shall be due on April 30, 2015. 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 Dischargers' 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 shall be prepared for each monitored water-bearing zone. Historical groundwater elevations shall be included in the fourth quarterly report each year.

c. Groundwater Analyses: Groundwater sampling data shall be presented in tabular form, and an isoconcentration map shall 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 fourth quarterly 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, shall be included in electronic format only.

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 fourth quarterly report each year.

e. Status Report: The quarterly report shall describe relevant work completed during the reporting period (e.g., Site investigation, interim remedial measures) and work planned for the following quarter.

4. **Violation Reports**: If the Dischargers violate requirements in this Order, then the Dischargers shall notify the Regional Water Board office by telephone as soon as practicable once the Dischargers have knowledge of the violation. Regional Water 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.

5. **Other Reports**: The Dischargers shall notify the Regional Water 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.

6. **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 Regional Water Board upon request.

7. **SMP Revisions**: Revisions to the Self-Monitoring Program (SMP) 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.