

# RECEIVED

10:13 am, Apr 13, 2009

Alameda County Environmental Health

December 14, 2007

Mr. Steven Plunkett Alameda County Environmental Health Services Hazardous Materials Specialist 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

#### Re: Soil and Groundwater Investigation Letter Report Fordham Properties, 5515 Doyle Street, Emeryville, California Perjury Statement

Dear Mr. Plunkett:

Regarding the attached report, I make the following statement: I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge.

Very truly yours,

Renald J. hla

Ronald J. Silberman President Fordham Properties, Inc.

Attachment

Fordham Properties Inc. 5835 Doyle St. Suite 101 Emeryville, CA 94608 510 547-7177 FAX 547-8442

# ΕΝΥΙΚΟΝ

April 8, 2009

Ms. Barbara Jakub, P.G. Alameda County Environmental Health Services Hazardous Materials Specialist 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Addendum to Soil and Groundwater Investigation Letter Report Fuel Leak Case No. RO0000376 and Geotracker Global ID T0600101903 Fordham Properties, 5515 Doyle Street, Emeryville, California

On behalf of Fordham Properties, ENVIRON International Corporation (ENVIRON) is pleased to present this addendum to the above-referenced letter report. The addendum provides the signature page of the original report, including signatures. In addition, the addendum provides two additional attachments: Attachment D (Boring Logs) and Attachment E (Boring Permit). This addendum is being provided in response to your January 30, 2009 letter sent to Mr. Ron Silberman of Fordham Properties. The addendum will be uploaded to the Alameda County FTP site as an unsecured PDF document.

Please contact Mr. Ross Russell of ENVIRON if you have any questions or concerns.

Very Truly Yours,

methinal

Ross Russell, P.G. Project Manager



cc: Mr. Ron Silberman, Fordham Properties

Attachments A. Letter Report Addendum

# ATTACHMENT A

# LETTER REPORT ADDENDUM

**Includes:** 

- 1. Signed signature page for the Dec. 14, 2007 Report
- Attachment D: Boring Logs
  Attachment E: Boring Permit

#### Mr. Steven Plunkett, ACEHS

- 5 -

Please contact Mr. Ross Russell at 510-420-2520 should you have any questions.

Norman T. Ozaki, Ph.D., Principal

Ross E. Russell, P.G., Senior Associate

December 14, 2007 Date

December 14, 2007



cc: Mr. Ron Silberman, Fordham Properties

Attachments

- A. Tables
- B. Figures
- C. Laboratory Analytical Report
- D. Boring Logs
- E. Boring Permit

References:

- 1. SOMA, 1995. Soil Remediation Activities: Fordham Property, 5515 Doyle Street, Emeryville, California. Prepared for Mr. Ronald Silberman, Fordham Properties.
- SOMA, 1998. Work Plan for Limited Groundwater Investigation, 5515 Doyle Street Property, Emeryville, California. Prepared for Mr. Ronald Silberman, Fordham Properties.
- 3. ENVIRON, 2007. Work Plan for Soil and Groundwater Investigation, 5515 Doyle Street, Emeryville, California. Prepared for Mr. Ronald Silberman, Fordham Properties.

# ATTACHMENT D

# **BORING LOGS**

		Site ID: SGW-1	Date(s): 11/14/07
<u>EN</u>	IVIRON	Location: 5515 Doyle Street, I	Emeryville, CA
6001 Shellmound	Street, Suite 700, Emeryville, CA	Logged By: <b>D. Clark</b> C	Checked By: R. Russell
Contractor: RSI		/	
Drilling Method: Direct	Push	GS Elevation: n/a T	FOC Elevation: n/a
Sampling Method: Contin	uous core	North: n/a E	East: <b>n/a</b>
Well Construction:		Borehole Dia.: 2.25 inches T	Fotal Depth: 20.0 feet
Blank Casing: Temporary	PVC 0-10 ft 10-20 ft	Project Number: 03-18392A	
	10 20 11	Project Name: Fordham Properties	
Annular Fill: None	N/A	Remarks: Groundwater sample casing screened 10-2	collected from temporary PVC 0 ft.
Elevation (ft) Depth (ft) Sample Interval Sample No.	Time PID (ppm) Graphic Log USCS Code	Material Description	Well Construction
5	ND CL ND CL ND CL	No recovery.      CLAY with sand (CL), VERY DARK GRAYISH BROWN 3/2); stiff, damp, low plasticity, low toughness, trace gravel, tan mottling (5% gravel, 25% sand, 70% fines).      No recovery.      GRAVELLY CLAY (CL), GRAYISH BROWN (2.5Y 5/2); s moist, medium plasticity, medium toughness (20% gravel, 70% fines).      At 8 ft: color becomes dark gray (10YR 4/1).      SILTY CLAY (CL), GRAYISH BROWN (10YR 5/2); mediu moist to wet, medium plasticity, medium toughness (0% grasand, 100% fines).      At 11.5 ft: 2-inch interval of wet gravelly clay with trace dark rusty mottling.      At 14.5 ft: becomes moist.      At 15 ft: color becomes light yellowish brown (2.5Y 6/4).      SANDY CLAY (CL), LIGHT YELLOWISH BROWN (2.5Y 6/4).	I (10YR trace    stiff, 10% sand,    um stiff, avel, 0%    s gray and    Y 6/4); gravel,
20 30 1-19.5 - - - - - - - - - - - - - - - - - - -		Boring completed at a depth of 20.0 ft below ground surface 11/14/07. Groundwater encountered at a depth of 10 ft bgs on 11/14/0 Measured groundwater parameters: pH: 7.21, conductivity: 0.506 mS/cm, and temperature: 26.4 C Borehole grouted to surface on 11/14/07.	e (bgs) on 07. 4 degrees
Sample Core Graphics No R	e Interval Recovery	∑ Firs gro	st encountered ound water Page 1 of 1

					Site ID: SGW-2	Date(s): 1	1/14/0	)7
	ENV	IRO	Ν		Location: 5515 Doyle Str	eet, Emeryville,	СА	
6001 St	nellmound Street, St	uite 700, Eme	eryville, CA 9	94608	Logged By: <b>D. Clark</b>	Checked By	/: F	R. Russell
Contractor:	RSI							
Drilling Method:	Direct Push				GS Elevation: n/a	TOC Elevat	ion:	n/a
Sampling Method	: Contiuous cor	e			North: <b>n/a</b>	East: n/a		
Well Construction	<u>:</u>				Borehole Dia.: 2.25 inches	Total Depth	: 2	0.0 feet
Blank Casing: Te	emporary PVC	0-1 10-	10 ft -20 ft		Project Number: 03-18392A			
		10	20 11		Project Name: Fordham Prope	rties		
Annular Fill: No	one	N/A	4		Remarks: Former UST pit. Groundwater sa casing screened	Low recovery - nple collected 1 10-20 ft.	debr from	is in fill. temporary PVC
Elevation (ft) Depth (ft) Sample Interval	Sample No. Time	PID (ppm) Granhic I od	USCS Code		Material Description		Water Level	Well Construction
	SG2-11.5 1415 SG2-19.5 1430	ND ND ND 3.5 2.1 	GC GC GC GC GC CL	No recovery.      FILL (GC), san fragments.      No recovery.      FILL (GC), san fragments.      No recovery.      FILL (GC), san fragments.      No recovery.      FILL (GC), san fragments, mois No recovery.      FILL (GC), san fragments.      No recovery.      SANDY CLAY medium plastic 65% fines).      At 19.5 ft: becom Boring complete 11/14/07.      Groundwater en Measured grou ms/em and ter en Measured grou ms/em and te	d and clay mixed with gravel, brick, an d and clay mixed with gravel, brick, an d and clay mixed with gravel, brick, an d and clay mixed with gravel, brick, an st to wet. d and clay mixed with gravel, brick, an <b>(CL), GRAYISH BROWN (2.5Y 5/3)</b> ; ity, very fine sand (0% gravel, 30% sa <b>(CL), GRAYISH BROWN (2.5Y 5/3)</b> ; ity, very fine sand, trace gravel (5% gr mes wet ed at a depth of 20.0 ft below ground s ncountered at a depth of 11 ft bgs on 1 ndwater parameters: pH: 7.19, conduc	d concrete d concrete d concrete d concrete d concrete stiff, moist, nd, 70% fines). stiff, moist, avel, 30% sand, urface (bgs) on 1/14/07. ttivity: 0.585	· · · · · · · · · · · · · · · · · · ·	
Sample Graphics	Core Interval			Borehole groute	ed to surface on 11/14/07. 	First encountered	ed	Page 1 of 1

									Site ID:	SGW-3	Date(s): 1	1/14/0	)7
			€N	V	IR	ON	Ī		Location:	5515 Doyle Stre	et, Emeryville,	CA	
		6001 S	hellmound	Street, S	Suite 70	0, Emeryvil	le, CA 9	4608	Logged By:	D. Clark	Checked B	/: I	R. Russell
Contra	actor:		RSI										
Drillin	g Met	hod:	Direct F	Push					GS Elevation:	n/a	TOC Elevat	ion:	n/a
Samp	ling N	lethoo	: Continu	Jous c	ore				North: n/a		East: n/a		
Well (	Consti	ructior	<u>ı:</u>						Borehole Dia.	2.25 inches	Total Depth	: 2	0.0 feet
Blank	Casir	ng: Te	emporary l	PVC		0-10 ft	4		Project Numb	oer: 03-18392A			
Sciee		0.	010 Inch			10-201	L		Project Name	: Fordham Proper	ties		
Annul	ar Fill:	: N	one			N/A			Remarks: C	Groundwater sam casing screened	ple collected t 10-20 ft.	from	temporary PVC
Elevation (ft)	Depth (ft)	Sample Interval	Sample No.	Time	PID (ppm)	Graphic Log	USCS Code		Material I	Description		Water Level	Well Construction
	- - - - - - - - - - - - - - - - - - -		SG3-9 SG3-12 SG3-19.5	1235 1246 1300	ND 653 1251 1376 13.2 ND ND		CL	SILTY CLAY ( plasticity, trace No recovery. SILTY CLAY ( plasticity, trace At 6 ft: trace gra At 7 ft: color be staining and hy At 10.5 ft: no st At 12 ft: color b At 13.5 ft: color At 13.5 ft: color At 15.5 ft: trace At 16 ft: becom At 17.5 ft: incre At 18.5 ft: beco	CL), BLACK (10Y sand, tan mottling CL), BLACK (10Y sand, tan mottling avel and sand. comes dark greeni drocarbon odor, st taining or hydrocart ecomes brown (10 becomes grayish l e gravel. es very stiff. casing fine sand. mes soft and wet.	<b>R 2/1)</b> ; stiff, damp, m (0% gravel, 10% sar <b>R 2/1)</b> ; very stiff, dam (0% gravel, 10% sar sh gray (Gley 1 4/1), iff. boon odor, 100% fines YR4/3), moist to wet. brown (2.5Y 5/3), mo	edium Id, 90% fines). Ip, medium Id, 90% fines). with dark		
	20- - - 25- - - - -							Boring complet 11/14/07. Groundwater e Measured grou mS/cm, and ter Borehole grout	ted at a depth of 20 incountered at a de undwater paramete mperature: 22.0 de ed to surface on 11	9.0 ft below ground su opth of 12 ft bgs on 11 rs: pH: 7.10, conduct grees C. 1/14/07.	rface (bgs) on /14/07. ivity: 0.649		
9	Sampl	le	Core	Interval						$\overline{\Delta}$	First encountered ground water	ed	Page 1 of 1
(	Graph	ics	No R	ecovery	,								

									Site ID:	SGW-4	Date(s): 1	1/14/0	07
	ENVIRON								Location: 5515 Doyle Street, Emeryville, CA				
		6001 S	hellmound	Street, S	Suite 70	0, Emeryvil	le, CA 9	4608	Logged By:	D. Clark	Checked B	y: I	R. Russell
Contr	actor:		RSI										
Drillin	g Metl	hod:	Direct F	Push					GS Elevation:	GS Elevation: <b>n/a</b> TOC Elevation: <b>n/a</b>			
Samp	ling N	lethoo	: Continu	Jous c	ore				North: <b>n/a</b>		East: n/a		
<u>Well</u> (	Constr	ructior	<u>ı:</u>						Borehole Dia.	: <b>2.25 inch</b>	es Total Depth	: 2	20.0 feet
Blank	Casir	ng: Te	emporary l 010 inch	PVC		0-10 ft 10-20 f	ť		Project Numb	er: 03-18392	Α		
		0.					-		Project Name	: Fordham Proj	perties		
Annul	ar Fill:	: N	one			N/A			Remarks: C	Groundwater s asing screene	ample collected t ed 10-20 ft.	from	temporary PVC
Elevation (ft)	Depth (ft)	Sample Interval	Sample No.	Time	PID (ppm)	Graphic Log	USCS Code		Material I	Description		Water Level	Well Construction
	- - - - - - - - - - - - - - - - - - -		SG4-9 SG4-12.5 SG8-12.5 (dup) SG4-19.5	1330 1340 / 1345 1400	1465 1592 0.6 ND		CL	No recovery. SILTY CLAY (0 sand, tan mottli No recovery. SILTY CLAY (0 damp, medium staining (0% gr At 7.5 ft: trace g At 7.5 ft: trace g At 11.5 ft: color At 12.5 ft: becon At 13.5 ft: wet. At 15.5 ft: soft. At 16 ft: becom At 16.5 ft: color At 18.5 ft: mois At 19.5 ft: wet, 1 Boring complet	CL), BLACK (10YI ing (0% gravel, 10% CL), DARK GREE plasticity, trace sat avel, 10% sand, 90 gravel. becomes brown (1 mes moist to wet. es stiff and moist. becomes grayish I trace fine sand. t. trace gravel. ed to a depth of 20	R 2/1); medium s % sand, 90% fine ENISH GRAY (5 nd, hydrocarbon o 0% fines). 10YR 4/3). brown (2.5Y 5/3).	tiff, damp, trace s). GY 4/1); very stiff, odor, with dark		
	- - - 25- - - - -							Boring complet 11/14/07. Groundwater e Measured grou mS/cm, and ter Borehole grout	ed to a depth of 20 ncountered at a de indwater parameter mperature: 20.8 de ed to surface on 11	.0 ft below ground pth of 12.5 ft bgs rs: pH: 7.33, cond grees C. /14/07.	d surface (bgs) on on 11/14/07. luctivity: 0.650		
	Sampl Graph	le ics	Core	Interval ecovery	l ,						First encounter ground water	ed	Page 1 of 1

									Site ID:	SGW-5	Date(s): 1	1/14/0	)7
								Location: 5515 Doyle Street, Emeryville, CA					
		6001 S	hellmound	Street, S	Suite 70	0, Emeryvi	lle, CA 9	4608	Logged By:	D. Clark	Checked By	/: <b>I</b>	R. Russell
Contr	actor:		RSI										
Drillin	g Met	hod:	Direct F	Push					GS Elevation:	n/a	TOC Elevati	ion:	n/a
Samp	oling N	1ethoc	: Continu	lous c	ore				North: <b>n/a</b>		East: <b>n/a</b>		
Well (	Consti	ructior	<u>ı:</u>						Borehole Dia.	2.25 inches	Total Depth	: 2	4.0 feet
Blank	Casir	ng: Te	emporary l	PVC		0-14 ft 14-24 f	fi		Project Numb	er: 03-18392A			
		0.							Project Name	: Fordham Properti	es		
Annul	lar Fill:	: N	one			N/A			Remarks: G	Groundwater samp asing screened 14	ble collected f 1-24 ft.	rom	temporary PVC
Elevation (ft)	Depth (ft)	Sample Interval	Sample No.	Time	PID (ppm)	Graphic Log	USCS Code		Material [	Description		Water Level	Well Construction
	_							No recovery.					
	-		SG5-3	1055	ND		CL	SILTY CLAY (6 medium plastic sand, 95% fine	CL), BLACK(10YI ity, trace sand, with s).	<b>R 2/1)</b> ; soft, damp to m a brown mottling (0% g	ioist, ravel, 5%		
	5 -		SG5-6	1100	ND 344			At 5.5 ft: color b	becomes brown (10 comes dark greenis	YR 4/3), becomes sar sh gray (Gley 1 4/1) w	idy. th dark		
	- - 10-		SG5-9	1130	790 782			staining, hydrod At 8.5 ft: gravel	carbon odor. ly, moist, strong hy	drocarbon odor.			
	-		SG5-11.5	1135	581 1.4		At 11.5 ft: color becomes brown (10YR 4/3), moist to wet. At 12 ft: wet.	<u>.</u>	¥				
	- 15-				ND			At 14 ft: color b	ecomes light olive l	orown (2.5Y 5/3).			
	-				ND			At 16 ft: very st	iff, moist.				
	-				ND				II SUII, IFACE COAFSE	sanu ano gravel.			
	<b>20</b>				ND			At 19.5 ft: beco	mes sandy, wet.				
	-							At 22 ft: gravelly	y, damp.				
	-		SG5-23.5	1205	ND	FXX/	1	At 23 ft: soft, we	et.	Off bolow ground and	and (bas) as		
601/	25-	-						11/14/07.	eu al a ueptri 0124	.o it below ground Sun	ace (bys) on		
J; 3/2	-	-						Groundwater e	ncountered at a de	pth of 11.5 ft bgs on 1	1/14/07.		
Э.	-	]						Measured grou mS/cm, and ter	ndwater parameter nperature: 22.2 dec	rs: pH: 7.19, conductiv grees C.	ity: 0.587		
	-							Borehole groute	ed to surface on 11	/14/07.			
File: 5515 DUYLt	Sample Graphics  Core Interval  First encountered ground water  First encountered ground water  Page 1 of 1												

						Site ID:	SGW-6	Date(s): 11	/14/0	)7
	ENV		Location: 5515 Doyle Street, Emeryville, CA							
6001 St	hellmound Street, S	Suite 700	), Emeryvill	le, CA 94	4608	Logged By:	D. Clark	Checked By	: <b>I</b>	R. Russell
Contractor:	RSI									
Drilling Method:	Direct Push					GS Elevation:	n/a	TOC Elevati	on:	n/a
Sampling Method	: Continuous co	ore				North: <b>n/a</b>		East: <b>n/a</b>		
Well Construction	<u>ı:</u>					Borehole Dia.:	2.25 inches	Total Depth:	2	0.0 feet
Blank Casing: Te	emporary PVC		0-10 ft 10-20 f	t		Project Numb	er: 03-18392A			
				•		Project Name	: Fordham Propertie	es		
Annular Fill: No	one		N/A			Remarks: G	Groundwater samp asing screened 10	le collected f )-20 ft.	rom	temporary PVC
Elevation (ft) Depth (ft) Sample Interval	Sample No. Time	PID (ppm)	Graphic Log	USCS Code		Material [	Description		Water Level	Well Construction
					No recovery.					
	SG6-10 0955 SG6-19.5 1040	ND ND 4.6 9.8 1046 43.5 1.2 ND ND		CL CL GC CL	SILTY CLAY (C medium plastici At 3 ft: very stiff No recovery. SILTY CLAY (C plasticity, trace At 8 ft: color bee staining, very sl CLAYEY GRA (5GY 4/1); dens dark staining, h CLAY with sar medium stiff, m staining, hydroc	CL), BLACK (10YF ity, trace sand (0% ; damp, low plastici CL), GRAYISH BR sand and gravel (5 comes dark greenis tiff to hard, hydroca VEL with sand (GG se, moist to wet, an ydrocarbon odor (5 doist to wet, medium carbon odor (0% gr D with gravel (SC) ense, damp to mois 6 fines).	R 2/1); soft, damp to m gravel, 10% sand, 90 <sup>6</sup> ity, trace sand and grav ity, trace sand and grav ity, trace sand and grav cOWN (2.5Y 5/2); stiff, % gravel, 10% sand, 8 sh gray (Gley 1 4/1) wi rbon odor. C), DARK GREENISI gular gravel to 1/2 inch 5% gravel, 20% sand, REENISH GRAY (5G m plasticity, very fine si ravel, 15% sand, 85% to back the same same same same same same same sam	oist, % fines). vel. damp, low %5% fines). %5% fines). %6 dark 1 GRAY 1, dense, 25% fines). %7 4/1); and, dark fines).	Ā	
20 - - - - - - - - - - - - -					Boring complete 11/14/07. Groundwater en Measured grou mS/cm, and ter	ncountered at a depth of 20. ncountered at a dep ndwater parameter nperature: 21.0 deç	.0 ft below ground surfa pth of 9 ft bgs on 11/14 rs: pH: 7.29, conductivi grees C.	ace (bgs) on /07. ty: 0.671		
Sample Graphics	Core Interval	,					∑ F	First encountere ground water	d	Page 1 of 1

# ATTACHMENT E

# **BORING PERMIT**

#### Alameda County Public Works Agency - Water Resources Well Permit



399 Elmhurst Street Hayward, CA 94544-1395 Telephone: (510)670-6633 Fax:(510)782-1939

Application Approved	d on: 11/05/2007 By jamesy	Permit Numbers: W2007-1127 Permits Valid from 11/14/2007 to 11/15/2007			
Application Id:	1194027205009 5515 Davida St. Emorravilla, CA 04608	City of Project Site: Emeryville			
Project Start Date:	11/14/2007	Completion Date:11/15/2007			
Applicant:	Environmental International Corporation - Daniel	<b>Phone:</b> 510-420-2563			
Property Owner: Client:	C Clark 6001 Shellmound St #700, Emeryville, CA 94608 Fordham Properties c/o Ron Silberman 5835 Doyle St #101, Emeryville, CA 94608 ** same as Property Owner **	Phone:			
	T Receipt Number: WR2007-0490 T Payer Name : Environ InternationalF	Total Due:\$200.00Total Amount Paid:\$200.00Paid By: CHECKPAID IN FULL			
	Corporation				
Works Requesting Pe	ermits:				

Borehole(s) for Investigation-Contamination Study - 6 Boreholes Driller: RSI Drilling - Lic #: 802334 - Method: DP

Permit Number	Issued Dt	Expire Dt	# Boreholes	Hole Diam	Max Depth
W2007-	11/05/2007	02/12/2008	6	3.00 in.	20.00 ft
1127					

#### **Specific Work Permit Conditions**

1. Backfill bore hole by tremie with cement grout or cement grout/sand mixture. Upper two-three feet replaced in kind or with compacted cuttings. All cuttings remaining or unused shall be containerized and hauled off site. The containers shall be clearly labeled to the ownership of the container and labeled hazardous or non-hazardous.

2. Boreholes shall not be left open for a period of more than 24 hours. All boreholes left open more than 24 hours will need approval from Alameda County Public Works Agency, Water Resources Section. All boreholes shall be backfilled according to permit destruction requirements and all concrete material and asphalt material shall be to Caltrans Spec or County/City Codes. No borehole(s) shall be left in a manner to act as a conduit at any time.

3. Permittee shall assume entire responsibility for all activities and uses under this permit and shall indemnify, defend and save the Alameda County Public Works Agency, its officers, agents, and employees free and harmless from any and all expense, cost, liability in connection with or resulting from the exercise of this Permit including, but not limited to, properly damage, personal injury and wrongful death.

4. Prior to any drilling activities, it shall be the applicant's responsibility to contact and coordinate an Underground Service Alert (USA), obtain encroachment permit(s), excavation permit(s) or any other permits or agreements required for that Federal, State, County or City, and follow all City or County Ordinances. No work shall begin until all the permits and requirements have been approved or obtained. It shall also be the applicants responsibilities to provide to the Cities or to Alameda County an Traffic Safety Plan for any lane closures or detours planned. No work shall begin until all the permits and requirements have been approved or obtained.

Work Total: \$200.00

### Alameda County Public Works Agency - Water Resources Well Permit

5. Applicant shall contact Vicky Hamlin for an inspection time at 510-670-5443 or email to vickyh@acpwa.org at least five (5) working days prior to starting, once the permit has been approved. Confirm the scheduled date(s) at least 24 hours prior to drilling.

6. Copy of approved drilling permit must be on site at all times. Failure to present or show proof of the approved permit application on site shall result in a fine of \$500.00.

7. Prior to any drilling activities onto any public right-of-ways, it shall be the applicants responsibilities to contact and coordinate a Underground Service Alert (USA), obtain encroachment permit(s), excavation permit(s) or any other permits required for that City or to the County and follow all City or County Ordinances. It shall also be the applicants responsibilities to provide to the Cities or to Alameda County a Traffic Safety Plan for any lane closures or detours planned. No work shall begin until all the permits and requirements have been approved or obtained.

8. Permit is valid only for the purpose specified herein. No changes in construction procedures, as described on this permit application. Boreholes shall not be converted to monitoring wells, without a permit application process.