napthalene (commercial scenario, hazard quotient). To extrapolate TPH-d, we multiply 8,800 ppm x 0.0013 (since diesel fuel is 0.13% napthalene). The result is 11.44 ppm napthalene, which is clearly less than the RBSL of 107 ppm. The "soil to building" pathway is a more conservative pathway to use anyway, because the building lies approximately 5' away from the tank pit.

There is a rationale for leaving the "contaminated" soils in place in the tank pit, based on the Tier 1 analysis. However, due to a) the elevated TPH-d concentrations, and b) the proximity to groundwater, which lies approximatley 20 to 25'bgs, a groundwater investigation is warranted, as per Sect. 2724 of Chapter 16, Division 3, Title 23, California Code of Regulations. **You are requested to submit a workplan for a Soil and Water Investigation (SWI) within 45 days, or by July 29, 1996.** Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

A traditional groundwater investigation consists of a minimum of three monitoring wells in an equilateral triangular configuration to determine groundwater flow direction and to assess groundwater quality. However, based on the nature of the contaminant (diesel has relatively little benzene, as opposed to gasoline), it would be acceptable to use rapid site assessment methods (i.e. cone penetrometer testing, geoprobe, hydropunch, etc.) to qualitatively assess impacts and to define the extent of the possible groundwater contaminant plume, at least as a first step of the SWI. If groundwater is heavily impacted, the results of the SWI will be used to later implement corrective action, as per a Corrective Action Plan, as defined in Sect. 2726 of Chapter 16, Division 3, Title 23, California Code of Regulations. If groundwater is not impacted, or relatively clean, no further work will be required.

You may opt to keep the tank pit open while doing the soil and groundwater investigation. If groundwater is relatively impacted by hydrocarbons, you may want to remove the diesel-impacted soil from the tank pit. Another option is tofirst remove the diesel-impacted soil from the tank pit in the hope of limiting the impact to groundwater, then fill in the tank cavity to grade, and then implement the SWI.

I believe our mutual goal is the closure of this case, at which point a closure letter will be issued from this office, and signed by the Director of this Department. As you probably know, the closure letter is usually paramount in importance when doing a property transfer or refinancing a property loan.