Rolls-Royce

Rolls-Royce Engine Services-Oakland Inc.
7200 Earhart Road
Oakland, California 94621-4504

Tel: (510) 613-1000

April 4, 2012

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Attention: Mr. Keith Nowell

Re: Proposed Reduction of Groundwater Monitoring and Reporting Program
Rolls-Royce Engine Services - Oakland, Inc.
Test Cell Facility
6701 Old Earhart Road
Oakland, California

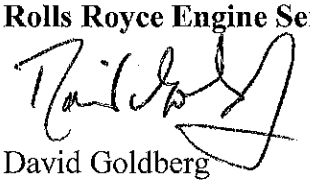
Dear Mr. Nowell:

Submitted herewith for your review is a letter entitled Proposed Reduction of Groundwater Monitoring and Reporting Program for the Rolls-Royce Engine Services – Oakland, Inc. Test Cell Facility in Oakland, California prepared by PES Environmental, Inc.

I declare, under penalty of perjury, that the information and recommendations contained in the attached document are true and correct to the best of my knowledge.

Very truly yours,

Rolls Royce Engine Services - Oakland, Inc.



David Goldberg
Facilities HS&E Specialist

cc: David Cooke, Esq. – Allen Matkins
Diane Heinze – Port of Oakland
Yane Nordhav – BASELINE
Michele Heffes, Esq. - Port of Oakland
Christine Noma, Esq., - Wendel Rosen Black and Dean LLP
Kyle Flory – PES Environmental

PES Environmental, Inc.
Engineering & Environmental Services

March 29, 2012

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Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Attention: Mr. Keith Nowell

Re: Proposed Reduction of Groundwater Monitoring and Reporting Program
Rolls-Royce Engine Services - Oakland, Inc.
Test Cell Facility
6701 Old Earhart Road
Oakland, California

Dear Mr. Nowell:

PES Environmental, Inc. (PES) has prepared this letter on behalf of Rolls-Royce Engine Services - Oakland, Inc. (RRESO) regarding the Test Cell facility located at 6701 Old Earhart Road, Oakland, California. This letter proposes a reduction in groundwater sampling frequency, a reduction in the analytical program and a reduction in reporting frequency. RRESO has coordinated this proposal with the Port of Oakland (Port), and the Port concurs. RRESO currently conducts groundwater monitoring and reporting on 18 groundwater monitoring wells located on and in the vicinity of the Test Cell facility. The groundwater monitoring and reporting has been conducted by RRESO at the Test Cell facility since 2007.

The current groundwater monitoring and reporting program includes sampling the 18 groundwater monitoring wells on a semi-annual basis. The current analytical program includes total petroleum hydrocarbons quantified as gasoline (TPHg), diesel (TPHd), jet fuel (TPHjf), motor oil (TPHmo); benzene, toluene, ethylbenzene and xylenes (BTEX); methyl tert-butyl ether (MTBE); and naphthalene. The reporting is also conducted on a semi-annual basis.

The attached table presents a summary of the current sampling and analytical program, as well as the proposed reduction in sampling frequency and analytical program. Also included in the table is the rationale for the proposed actions. At the majority of the wells, concentrations of analytes have been demonstrated, over time, to be stable or decreasing, or not identified at or above their respective laboratory reporting limits. Under these circumstances, groundwater conditions can be monitored effectively with less frequent sampling events. Accordingly, the majority of the wells are proposed to be sampled on an annual basis with three wells proposed

for continued semi-annual sampling. The annual sampling event is proposed to be conducted in the first half of each year with the semi-annual event to be conducted in the second half of each year. The reporting frequency is proposed to be reduced to annual.

On behalf of RRESO, PES respectfully requests that Alameda County Environmental Health approve the request for reductions in groundwater monitoring frequency, analytical program and reporting frequency. Should you require additional information or have questions concerning this letter please contact me at (415) 899-1600.

Very truly yours,

PES ENVIRONMENTAL, INC.

Kyle S. Flory, P.G.
Principal Geologist

Attachment: Table – Proposed Groundwater Monitoring Frequency 2012 Initiation

cc: Dave Goldberg – RRESO
David Cooke, Esq. – Allen Matkins
Diane Heinze – Port of Oakland
Yane Nordhav – BASELINE
Michele Heffes, Esq. - Port of Oakland
Christine Noma, Esq., - Wendel Rosen Black and Dean LLP

ATTACHMENT

Rolls Royce Engine Services – Oakland
Test Cell Facility
6701 Old Earhart Road
Oakland, California

Proposed Groundwater Monitoring Frequency 2012 Initiation

Well ID	Current Sampling Frequency/ Analytical Program	Proposed Sampling Frequency/ Analytical Program	Rationale
MW-1	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	All analytes ND
MW-2	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	All analytes ND, except TPHjf in 2008
MW-3	Semi-Annual/TPH[1]/BTEX/MTBE/N	Semi-Annual/TPHd,jf,mo	TPHg/BTEX/N ND; increasing TPHd,jf,mo; MTBE below ESL
MW-4	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo
MW-5	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo
MW-6	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo
MW-7	Semi-Annual/TPH[1]/BTEX/MTBE/N	Semi-Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; increasing TPHd,jf,mo
MW-8	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo
MW-9	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo
MW-10	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND or well below ESLs; decreasing TPHd,jf,mo
MW-11	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo
MW-12	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	All analytes ND
MW-13	Semi-Annual/TPH[1]/BTEX/MTBE/N	Semi-Annual/TPHg,d,jf,mo/BTEX	Stable TPHg,jf; increasing TPHd & mo; benzene present; MTBE and N below ESLs
MW-14	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND or below ESLs, decreasing TPHd,jf, stable TPHmo
MW-15	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	All analytes ND, except TPHjf in March 2011
MW-17	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	All analytes ND, except TPHjf in January 2010
MW-18	Not Sampled	Not Sampled	Separate phase hydrocarbons present. SPH removed on a weekly basis.
NPORD MW-3	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	All analytes ND
NPORD MW-4	Semi-Annual/TPH[1]/BTEX/MTBE/N	Annual/TPHd,jf,mo	TPHg/BTEX/MTBE/N all ND; decreasing TPHd,jf,mo

Notes:
[1] – Total petroleum hydrocarbons quantified as gasoline (TPHg), diesel (TPHd), jet fuel (TPHjf) and motor oil (TPHmo)
BTEX – Benzene, toluene, ethylbenzene and xylenes
MTBE – Methyl tert-butyl ether
N – Naphthalene
ND – Not detected at or above respective laboratory reporting limit
ESL – Environmental Screening Level, California Regional Water Quality Control Board – San Francisco Bay Region, May 2008, Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Table F-1b, Groundwater Screening Levels (groundwater is not a current or potential drinking water resource), Final Groundwater Screening Level; Interim Final.