February 1, 1993

Mr. Ravi Arulanantham
Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, California 94621

Subject: **Response to Comments Regarding a Proposed Soil Placement Plan at the General Electric Company Vallecitos Nuclear Center (GE-Vallecitos), Pleasanton, California.**

Dear Mr. Arulanantham:

Science & Engineering Analysis Corporation (SEACOR) on behalf of GE-Vallecitos submitted a status report on November 30, 1992, detailing the treatment of approximately 10 cubic yards of diesel contaminated soil with concentrations measured initially ranging from 61 to 13,000 mg/kg. The soil was generated during removal of diesel fuel tank piping at the "300 Area", GE-Vallecitos. The status report included a proposed plan for on-site disposal of the soil at a location which is at least 30 feet above first encountered groundwater. SEACOR understands that you expressed to GE personnel a concern about protecting natural resources, specifically, drinking water resources in the Livermore Valley (Pleasanton). In response to these concerns, the following sections detail the location of the proposed placement site relative to usable groundwater resources and the existing groundwater monitoring program at the GE-Vallecitos site.

Groundwater Resources

The GE-Vallecitos site is located in the Vallecitos Subbasin within the Vallecitos Valley. Groundwater within this valley and subbasin occurs in the Livermore Gravel of Clark deposits and Vallecitos Creek alluvial deposits which are naturally drained only by outflow through Vallecitos Creek. Vallecitos Creek becomes part of the Sunol Valley groundwater basin which is in turn naturally drained by Alameda Creek. There is no direct pathway for surface or groundwater flow between the Vallecitos Subbasin and the Livermore Valley to the North. Groundwater within the Vallecitos subbasin flows in a southwesterly direction at the GE-Vallecitos site and is reportedly used primarily for agriculture and ranching. The following key reference documents contain detailed discussions of the Vallecitos Subbasin and the entire Alameda Creek watershed.

U.S.G.S. Water Resources Investigations 80-59, October, 1980, A Water Quality Monitoring Network For Vallecitos Valley, Alameda County California, 22 p.

California Department of Water Resources, 1974, Evaluation of Ground Water Resources, Livermore and Sunol Valleys, Bulletin 118-2, 79 p.
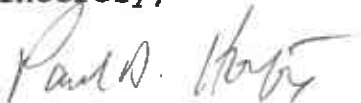
<u>Monitoring Network</u>

A groundwater monitoring network consisting of 9 monitoring wells exists at the GE-Vallecitos site. These monitoring wells are currently on an annual monitoring program which includes analysis for volatile organic compounds by EPA method 8240 (includes benzene, toluene, ethylbenzene, and xylenes). Five of these eight groundwater monitoring wells are located down-gradient of the proposed placement area. The location of these wells allows early detection of any potential groundwater impact. The results of the latest groundwater monitoring and sampling were documented in SEACOR's "REPORT ON ENVIRONMENTAL CONSULTING AND FIELD SERVICES, VALLECITOS NUCLEAR CENTER FACILITY, VALLECITOS ROAD, PLEASANTON, CALIFORNIA, JUNE 11, 1992", a copy of the groundwater gradient map from this latest report is attached.

In summary, SEACOR believes that the proposed soil placement plan provides adequate protection of the Vallecitos subbasin groundwater and also includes the added benefit of an existing groundwater monitoring network which will provide competent monitoring of groundwater quality at the GE-Vallecitos site. SEACOR on behalf of GE-Vallecitos requests approval of the previously proposed soil placement plan as documented in the SEACOR November, 30, 1992 correspondence.

If you have any questions, or require more information regarding the proposed soil disposal, please call myself at (510) 686-9780 or Sue Dahlin of GE at (510) 862-4345.
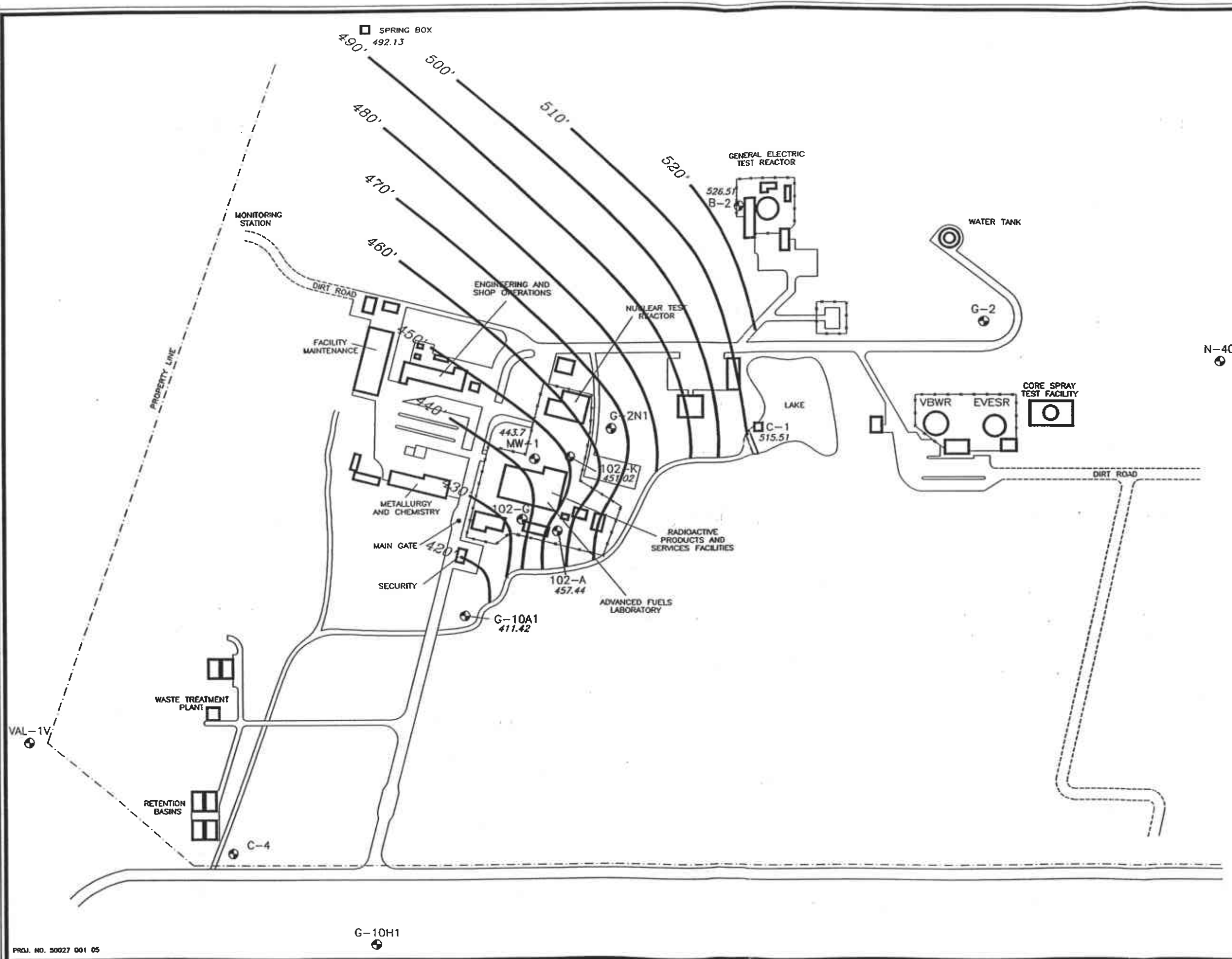
Sincerely,

Paul D. Horton   R.G.
Principal Hydrogeologist

Attachments: Groundwater Gradient Map

cc: John Lambie
      Sue Dahlin
gecom.let

FIGURE 2

WATER ELEVATIONS
JULY 26, 1991

SEACOR