

May 22, 2012

Dilan Roe
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

RECEIVED

1:39 pm, May 23, 2012

Alameda County
Environmental Health

Project No.
7828.000.001

Subject: Jordan Ranch Property (Case # R00002918)
Dublin, California

ADDENDUM TO SOIL AND GROUNDWATER REMEDIATION STATUS REPORT

References: ENGEO, Soil and Groundwater Remediation Status Report, Jordan Ranch, Dublin, California, ACEH Case No. R00002918, January 27, 2012.

Alameda County Environmental Health email correspondence, April 13, 2012.

Dear Ms. Roe:

On behalf of BJP-ROF Jordan Ranch, LLC, we are providing this addendum to the referenced remediation status report. The purpose of this addendum is to address comments received from Alameda County Environmental Health (ACEH) regarding the data presented in the remediation status report.

SOIL EXCAVATION DOCUMENTATION

We have revised the Figures (attached) to provide additional excavation details and photo documentation. Figure 2 lists the latitude and longitude of the lateral excavation limits, depicts the distance from the excavation to the site boundaries, and shows the location of product lines encountered during the excavation. Figure 3 provides a vertical profile of the excavation, and depicts the locations of excavation confirmation samples, soil staining, and the depth to the water table. A detailed discussion of the excavation observations and activities is provided in the remediation status report.

SOIL AND GROUNDWATER DATA

As discussed in the remediation status report, soil samples were collected from the sidewalls and base of the excavation, the non-impacted soil stockpile, the ex-situ treatment cell (pre-remediation) and ex-situ cell (post remediation). Table 1 (attached) provides a summary of the soil sample analytical data. Additionally, Table 2 (attached) provides a summary of all groundwater analytical data collected from the monitoring wells through January 2012. Grab groundwater analytical data from all previous investigations is summarized in the corrective action plan (CAP).

SOIL REMEDIATION AND REUSE

Soil generated during the remedial excavation was characterized and remediated in accordance with the *Region 2 Technical Reference Document, Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste, October 20, 2006* and the approved CAP.

As discussed in the remediation status report, the initial soil removed from the upper 5 feet of the excavation was screened with a photo ionization detector (PID). This soil exhibited no signs of impact and is believed to consist of topsoil that was used as backfill after the UST excavation. Therefore, this soil was segregated into a separate stockpile. We collected eight discrete samples from the 200 cubic yard (yd³) stockpile and submitted two 4 to 1 composite (SP 1-4/SP 5-8) for analysis of total petroleum hydrocarbons as gasoline (TPHg), diesel (TPHd) by EPA Test Method 8015M, and volatile organic compounds (VOCs) by EPA Test Method 8260B. As shown in Table 1, the samples exhibited trace detections of TPHd well below the established cleanup goal.

Soil that was excavated between 5 feet below ground surface (bgs) and the base of the excavation was spread in the ex-situ treatment cell to undergo bioaugmentation. Following completion of the bioaugmentation treatment, we collected 18 discrete samples (DS1-18) from the 450 yd³ stockpile, based on the frequency of one sample per 25 yd³ required by EPA SW-846 (Figure 2). The 18 discrete samples were submitted for analysis of TPHg, TPHd, benzene, toluene, ethylbenzene, xylenes, and methyl tert butyl ether. As shown in Table 1, two samples locations (DS2/DS12) exhibited TPHd concentrations above the established cleanup goal. Approximately 12 yd³ and 18 yd³ were subsequently removed from locations DS2 and DS12; based on real-time monitoring with a PID. Approximately 42 tons of soil from these two locations was disposed at Hay Road Landfill. The remaining 16 sample locations exhibited concentrations less than the cleanup goals established in the CAP and the *Tier 1 limits* in Table 2 of the *Technical Reference Document*. The remaining 420 yd³ is proposed for unrestricted reuse.

In accordance with *Section 6.0 Reporting Requirements*, items 1-9, and 11 are included in the remediation status report and this addendum, and will be provided to the RWQCB-Region 2 upon request. Items 10 and 12 are included in the signed owner's soil reuse statement (Appendix A).

POST-REMEDIATION GROUNDWATER MONITORING

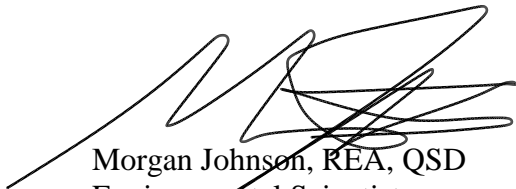
A post-remediation groundwater monitoring event was conducted during the first quarter 2012. The groundwater first quarter analytical results are shown in comparison to the cleanup goals in Table 2 (attached). Subsequently, we cleared the obstruction from MW-4 and the well was sampled during the second quarter 2012. The first quarter and second quarter groundwater monitoring events will be summarized in separate quarterly monitoring reports. We contacted Zone 7 Water Agency to discuss the missing well MW-3. Zone 7 agreed that all possible methods for locating the well have been attempted. Zone 7 stated that when submitting the well

abandonment permit application for the other monitoring wells, it should be noted on the application that MW-3 cannot be located. At this time, we propose to not replace MW-3. Review of the historical groundwater data for MW-3 shows that detectable concentrations of TPHg and benzene were exhibited during only one of the four quarterly events. During the most recent sampling event, no detections were reported. Based on the analytical data, the groundwater plume appears to be located to the east of MW-3, and is adequately delineated by MW-1, MW-2, MW-4, and MW-5.

If you have any questions regarding this addendum, please do not hesitate to contact us.

Sincerely,

ENGEO Incorporated



Morgan Johnson, REA, QSD
Environmental Scientist



Shawn Munger, CHG
Principal



Attachments: Figure 1 – Site Vicinity Map
Figure 2 – Site Plan
Figure 3 – Excavation Vertical Profile
Figure 4 – Excavation Photograph
Table 1 – Soil Remediation Analytical Data
Table 2 – Cumulative Monitoring Well Analytical Data
Appendix A – Owners’ Signed Soil Reuse Statement
Appendix B – Perjury Statement

Copies: Mr. Ravi Nandwana, BJP-ROF Jordan Ranch, LLC
Mr. Kevin Fryer, BJP-ROF Jordan Ranch, LLC

FIGURES

Figure 1 – Site Vicinity Map

Figure 2 – Site Plan

Figure 3 – Excavation Vertical Profile

Figure 4 – Excavation Photograph

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BASE MAP SOURCE: GOOGLE EARTH



VICINITY MAP
 JORDAN RANCH
 DUBLIN, CALIFORNIA

PROJECT NO.: 7828.000.001

DATE: AS SHOWN

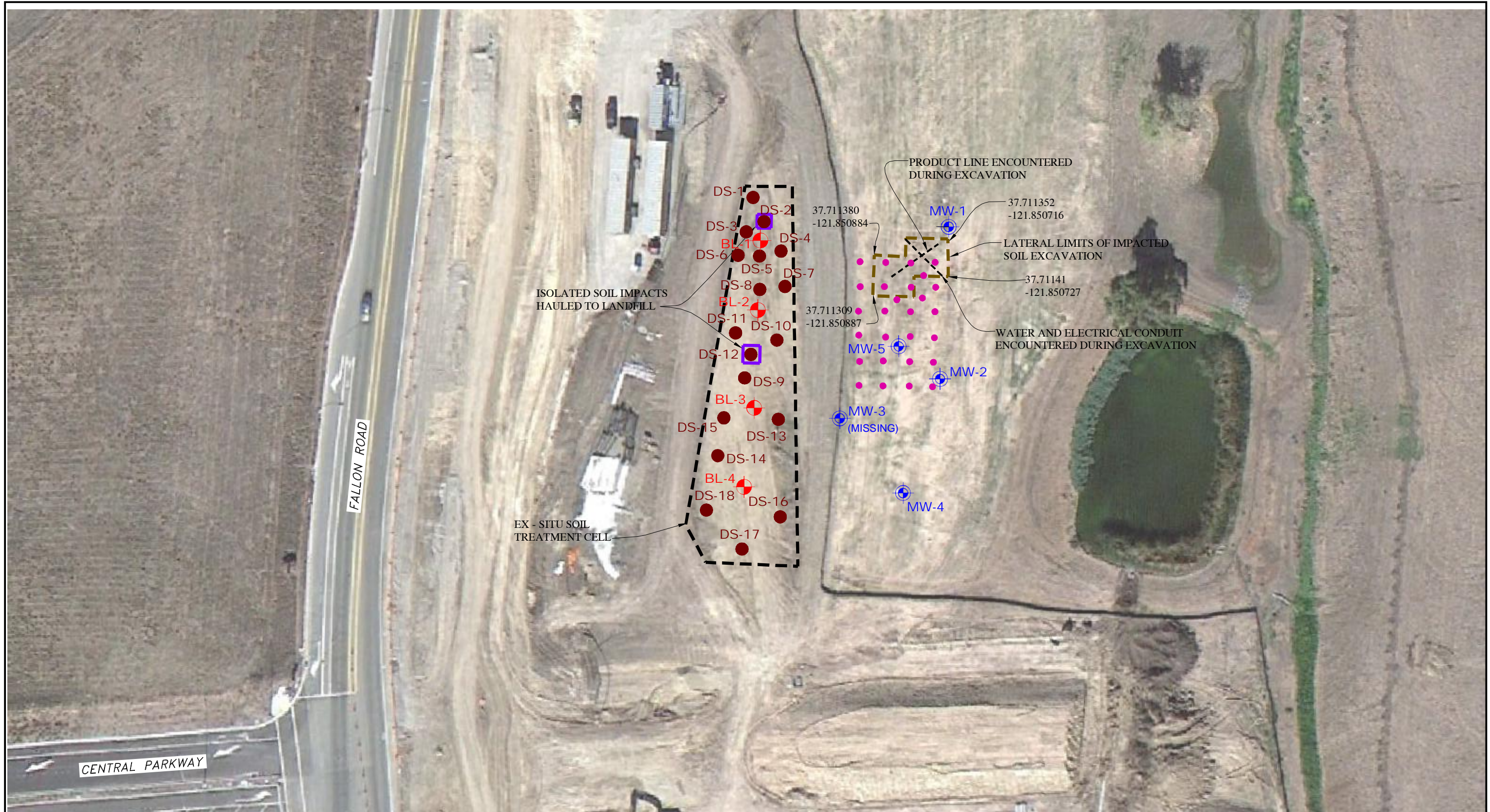
DRAWN BY: SRP

CHECKED BY: SM

FIGURE NO.

1

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EXPLANATION

- MW-5 APPROXIMATE LOCATION OF MONITORING WELL
- DS-18 APPROXIMATE LOCATION OF CONFIRMATION SOIL SAMPLE
- APPROXIMATE LOCATION OF INJECTION POINT
- BL-4 APPROXIMATE LOCATION OF PRE-BIOAUGMENTATION SAMPLE



BASE MAP SOURCE: GOOGLE EARTH, 2011



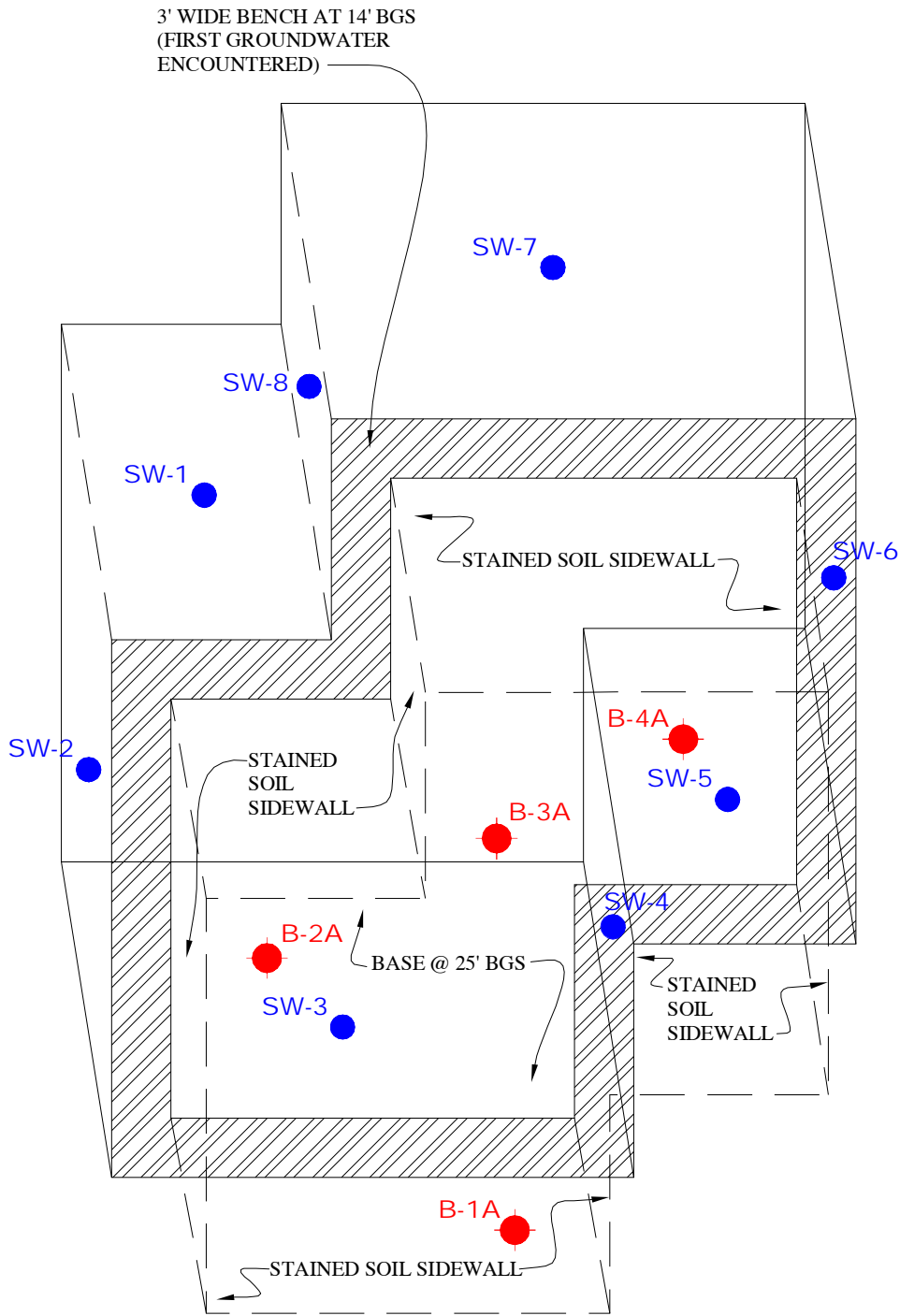
SITE PLAN
 JORDAN RANCH
 DUBLIN, CALIFORNIA

PROJECT NO.: 7828.000.001	
SCALE: AS SHOWN	
DRAWN BY: SRP	CHECKED BY: SM

FIGURE NO.

2

ORIGINAL FIGURE PRINTED IN COLOR



EXPLANATION

- **B-4A** APPROXIMATE LOCATION OF BASE SAMPLE COLLECTED AT 25' BGS
- **SW-8** APPROXIMATE LOCATION OF SIDEWALL SAMPLE COLLECTED AT 8' BGS



EXCAVATION VERTICAL PROFILE
 JORDAN RANCH
 DUBLIN, CALIFORNIA

PROJECT NO.: 7828.000.001

SCALE: AS SHOWN

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FIGURE NO.

3

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EXCAVATION PHOTOGRAPH
JORDAN RANCH
DUBLIN, CALIFORNIA

PROJECT NO.: 7828.000.001

SCALE: AS SHOWN

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FIGURE NO.

4

TABLES

- Table 1 – Soil Remediation Analytical Data**
- Table 2 – Cumulative Monitoring Well Analytical Data**

TABLE 1
Soil Remediation Analytical Data
Jordan Ranch

Sample ID	Date Sampled	Depth (ft bgs)	Location	TPHg (mg/kg)	TPHd (mg/kg)	TPHmo (mg/kg)	Bnz (mg/kg)	Tol (mg/kg)	EB (mg/kg)	Xyl (mg/kg)	n-B (mg/kg)	sec-B (mg/kg)	4-Iso (mg/kg)	Iso (mg/kg)	1,2,4-TMB (mg/kg)	1,3,5-TMB (mg/kg)	Nap (mg/kg)	MTBE (mg/kg)	n-Pro (mg/kg)
SW-1	9/2/2011	8	NW Sidewall	4.8	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-2	9/2/2011	8	WS Sidewall	5.2	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-3	9/2/2011	8	SW Sidewall	4.6	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-4	9/2/2011	8	ES Sidewall	4.5	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-5	9/2/2011	8	SE Sidewall	4.1	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-6	9/2/2011	8	EN Sidewall	4.2	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-7	9/2/2011	8	NE Sidewall	4.2	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SW-8	9/2/2011	8	WN Sidewall	5.1	<0.5	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
B-1A	9/6/2011	25	South Base	3,700	790	NA	<1	12	21	110	10	<1	<1	8.2	68	25	9.4	<1	15
B-2A	9/6/2011	25	South Base	1,800	65	NA	<1	15	25	140	8.6	<1	1.3	5	33	23	13	<1	11
B-3A	9/6/2011	25	North Base	480	47	NA	<1	3	9.4	49	3.1	<1	<1	<1	31	12	6.8	<1	4.7
B-4A	9/6/2011	25	North Base	480	110	NA	<1	3	4.6	27	3.8	<1	<1	<1	18	10	4.1	<1	4
SP 1-4	9/6/2011	0-0.5	Non Imp Stockpile	<0.5	4.9	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
SP 5-8	9/6/2011	0-0.5	Non Imp Stockpile	<0.5	4.6	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
BL-1	9/16/2011	0-0.5	Ex-Situ Cell-Baseline	32	0.11	0.066	<0.0047	<0.0047	<0.0047	0.062	0.16	0.018	0.018	<0.0047	0.39	0.3	0.2	<0.0047	0.02
BL-2	9/16/2011	0-0.5	Ex-Situ Cell-Baseline	0.019	0.034	<49	<0.0047	<0.0049	0.0073	<0.00025	0.22	0.031	0.027	0.012	<0.00013	0.00029	0.27	<0.0049	0.036
BL-3	9/16/2011	0-0.5	Ex-Situ Cell-Baseline	30	0.063	<50	<0.0049	<0.0049	0.033	0.45	0.32	0.054	0.045	0.024	0.42	0.73	1.1	<0.0047	0.08
BL-4	9/16/2011	0-0.5	Ex-Situ Cell-Baseline	12	15	<49	<0.023	<0.023	0.17	0.12	<0.023	<0.023	<0.023	0.098	0.28	0.28	<0.023	<0.023	0.023
DS-1	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.24	32	NA	<0.0047	<0.0047	<0.0047	<0.0094	NA	NA	NA	NA	NA	NA	NA	<0.0047	NA
DS-2*	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.25	170	NA	<0.005	<0.0005	<0.0005	<0.01	NA	NA	NA	NA	NA	NA	NA	<0.0005	NA
DS-3	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.24	92	NA	<0.0048	<0.0048	<0.0048	<0.0096	NA	NA	NA	NA	NA	NA	NA	<0.0048	NA
DS-4	11/29/2011	0.5-1	Ex-Situ Cell-Post	<0.23	2.1	NA	<0.0047	<0.0047	<0.0047	<0.0094	NA	NA	NA	NA	NA	NA	NA	<0.0047	NA
DS-5	11/29/2011	0.5-1	Ex-Situ Cell-Post	<0.24	92	NA	<0.0048	<0.0048	<0.0048	<0.0096	NA	NA	NA	NA	NA	NA	NA	<0.0048	NA
DS-6	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.23	1.6	NA	<0.0046	<0.0046	<0.0046	<0.0091	NA	NA	NA	NA	NA	NA	NA	<0.0046	NA
DS-7	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.24	92	NA	<0.0047	<0.0047	<0.0047	<0.0095	NA	NA	NA	NA	NA	NA	NA	<0.0047	NA
DS-8	11/29/2011	0.5-1	Ex-Situ Cell-Post	<0.23	<0.99	NA	<0.0046	<0.0046	<0.0046	<0.0093	NA	NA	NA	NA	NA	NA	NA	<0.0046	NA
DS-9	11/29/2011	0.5-1	Ex-Situ Cell-Post	1.6	13	NA	<0.0048	<0.0048	<0.0048	0.012	NA	NA	NA	NA	NA	NA	NA	<0.0048	NA
DS-10	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.24	1.4	NA	<0.0047	<0.0047	<0.0047	<0.0094	NA	NA	NA	NA	NA	NA	NA	<0.0047	NA
DS-11	11/29/2011	0-0.5	Ex-Situ Cell-Post	<1.1	41	NA	<0.0049	0.22	<0.0049	<0.0098	NA	NA	NA	NA	NA	NA	NA	<0.0049	NA
DS-12*	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.24	300	NA	<0.0049	<0.0049	<0.0049	<0.0097	NA	NA	NA	NA	NA	NA	NA	<0.0049	NA
DS-13	11/29/2011	0-0.5	Ex-Situ Cell-Post	0.4	14	NA	<0.0049	<0.0049	<0.0049	<0.0097	NA	NA	NA	NA	NA	NA	NA	<0.0049	NA
DS-14	11/29/2011	0.5-1	Ex-Situ Cell-Post	<0.24	3.1	NA	<0.0047	<0.0049	<0.0049	<0.0095	NA	NA	NA	NA	NA	NA	NA	<0.0049	NA
DS-15	11/29/2011	1-1.5	Ex-Situ Cell-Post	<0.23	<0.98	NA	<0.0046	<0.0046	<0.0046	<0.0092	NA	NA	NA	NA	NA	NA	NA	<0.0046	NA
DS-16	11/29/2011	0.5-1	Ex-Situ Cell-Post	<0.25	4.8	NA	<0.0049	<0.0049	<0.0049	<0.0099	NA	NA	NA	NA	NA	NA	NA	<0.0049	NA
DS-17	11/29/2011	1.5-2	Ex-Situ Cell-Post	<0.23	1.7	NA	<0.0046	<0.0046	<0.0046	<0.0092	NA	NA	NA	NA	NA	NA	NA	<0.0046	NA
DS-18	11/29/2011	0-0.5	Ex-Situ Cell-Post	<0.24	4.5	NA	<0.0048	<0.0048	<0.0048	<0.0097	NA	NA	NA	NA	NA	NA	NA	<0.0048	NA
Cleanup Goal				100 ¹	100 ¹	100 ¹	0.044 ¹	2.9 ¹	3.3 ¹	1.5 ¹	2.5 ²	2.5 ²	0.044 ¹	0.64 ²	0.0021 ²	0.0012 ²	3.4 ³	0.023 ¹	0.99 ²

¹Site specific cleanup level approved in the Corrective Action Plan

²EPA IV Regional Screening Level for groundwater protection

³Regional Water Quality Control Board Region 2 Environmental Screening Level for leaching to groundwater

*Soil surrounding sample was excavated and transported to a landfill. NA-Not Analyzed

TABLE 2
Cumulative Monitoring Well Analytical Data
Jordan Ranch Monitoring Wells

Well ID	Date	TPHd (ug/L)	TPHg (ug/L)	Benzene (ug/L)	Toluene (ug/L)	Ethyl-Benzene (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)
MW-1	12/6/2005	NA	64	2	<0.5	<0.5	<0.5	<0.5
	7/26/2006	<50	<50	<0.5	<0.5	<0.5	<0.5	<5.0
	4/10/2008	NA	<50	<0.5	<0.5	<0.5	<0.5	<50
	8/24/2010	<50	<50	<0.5	<0.5	<0.5	<1.0	<0.5
	1/10/2012	<50	<50	<0.5	1.1	1.1	2.4	<0.5
MW-2	12/6/2005	NA	3,400	470	<25	55	120	800
	7/26/2006	150	650	130	<0.5	<0.5	<0.5	510
	4/10/2008	NA	8,700	1,600	350	370	790	810
	8/24/2010	<50	15,000	780	93	1,200	2,600	170
	1/10/2012	1.1	4,200	32	10	210	337	<4
MW-3	12/6/2005	NA	<50	<0.5	<0.5	<0.5	<0.5	<0.5
	7/26/2006	<50	<50	<0.5	<0.5	<0.5	<0.5	<5.0
	4/10/2008	NA	430	45	34	22	90	<0.5
	8/24/2010	<50	<50	<0.5	<0.5	<0.5	<1.0	<0.5
	1/10/2012	Well inadvertently covered by grading operations						
MW-4	12/6/2005	NA	70	<0.5	<0.5	<0.5	<0.5	<0.5
	7/26/2006	<50	<50	<0.5	<0.5	<0.5	<0.5	<5
	4/10/2008	NA	830	29	19	16	54	1,200
	8/24/2010	<50	<50	<0.5	<0.5	<0.5	<1.0	80
	1/10/2012	Obstruction in well casing						
MW-5	12/6/2005	NA	53,000	13,000	1,300	930	4,400	7,000
	7/26/2006	560	15,000	4,100	580	200	870	2,200
	4/10/2008	NA	66,000	24,000	7,600	2,200	9,200	<130
	8/24/2010	<50	74,000	7,500	11,000	2,700	13,000	100
	1/10/2012	2.1	60,000	1,600	3,700	1,800	5,400	<4
Cleanup Goal		210 ¹	100 ²	1 ²	150 ²	300 ²	1,750 ²	13 ³

NOTES:

TPHg = Total petroleum hydrocarbons as gasoline

TPHd = Total petroleum hydrocarbons as diesel

MTBE = Methyl tert-butyl ether

(ug/L) = micrograms per liter or parts per billion

¹Regional Water Quality Control Board R2 Environmental Screening Level for Drinking Water Table F-3

²Cleanup goal approved in Corrective Action Plan

³California Department of Public Health Maximum Contaminant Level

APPENDIX A

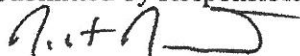
Owners' Signed Soil Reuse Statement

May 21, 2012

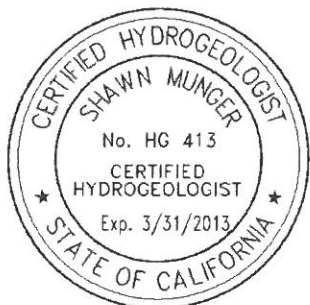
Owner's Soil Reuse Statement

The 420 cubic yards of petroleum impacted hydrocarbon soil (PHIS) proposed for reuse meets the definition of inert waste based on characterization and comparison to Tier 1 limits in accordance with the Region 2 Technical Reference Document, Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil and Inert Waste, October 20, 2006. The PHIS will be buried at least three feet beneath the ground surface, at least five feet above the groundwater table, at least 100 feet from a surface water body, not within a floodplain, and will be protected against erosion.

Submitted by Responsible Party:



ROBERT RADANOVICH
BJP-ROF Jordan Ranch, LLC
5000 Hopyard Road, #170
Pleasanton, CA 94588



APPENDIX B

Perjury Statement

May 21, 2012

Subject: Jordan Ranch Property – Former Leaking Underground Storage Tank
Dublin, California

PERJURY STATEMENT

“I declare, that to the best of my knowledge at the present time, the information and/or recommendations contained in the attached document are true and correct.”

Submitted by Responsible Party:



ROBERT RADANOVICH
BJP-ROF Jordan Ranch, LLC
5000 Hopyard Road, #170
Pleasanton, CA 94588