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Mr. John Goni State Water Resources Quality Control Board 895 Aerovista Place, Suite 101 San Louis Obispo, CA 93401-0397 October 15, 2011 Ref. No.: 4524-02

Ms. Bronwyn Feikert Monterey County Environmental Health 1270 Natividad Road Salinas, CA 93905

WORKPLAN SOIL MITIGATION 1 CORRAL DE TIERRA ROAD SALINAS, CALIFORNIA

1.0 INTRODUCTION

CapRock is pleased to present this work plan to provide soil mitigation services for the property at 1 Corral De Tierra Road, Salinas, California. The site is the location of the former Corral de Tierra Exxon. In late 2002 three Underground Storage Tanks (USTs) were removed from the site and Total Petroleum Hydrocarbons (TPH) were found above Monterey County Department of Environmental Health (MCDEH) action levels for TPH and benzene. In a letter dated July 6, 2011 Ms. Bronwyn Feikert of MCDEH requested an additional investigation to confirm soil contamination as well as define the vertical and lateral extent of the soil contamination and collect a groundwater sample.

CapRock installed three soil borings in the area where the tanks were once located and one boring outside the tank pit area in August 2011. Groundwater samples were also collected from the three groundwater monitoring wells and the drinking water well on site in August 2011. Only the soil and groundwater analyzed in boring B3 was found over the MCDEH and Central Coast Regional Water Quality Control Board (RWQCB) action levels for MTBE at a depth of 16.5 feet bgs, 21.5 feet bgs, as well as in the grab groundwater sample (results were 79.5 ug/kg, 550 ug/kg, and 2550 ug/L respectively). Soil was found less than the practical quantitative limit at 26.5 feet bgs for all analytes of concern. No other analytes of concern were found over the MCDEH action levels for soil or RWQCB action level for water. The groundwater samples from the monitoring and drinking water wells were found nondetect for all chemicals of concern analyzed on August 19, 2011.

In a letter from the MCDEH dated September 15, 2011 a work plan to assess the vertical and horizontal extent of the contamination and to remediate the soil contamination was requested. The RWQCB also requested a work plan to delineate the contaminants in groundwater in a letter dated September 21, 2011. This work plan provides that all impacted soil be excavated, confirmation soil and grab groundwater samples collected, and a report of results prepared.

Contamination is known to include the area in front of the old gas station building (northern side of the building) that is on the property. It is possible that the impacted soils may extend under the building, therefore the gas station building on the site will be demolished and removed in order to make way for the planned excavation.

2.0 BACKGROUND

The site is an approximately 0.7 acre irregularly shaped parcel in a rural area midway between Salinas and Monterey on Highway 68. The property consists of an old gas station building with awning and parking area. Portions of the building are currently being used for a real estate office.

The adjoining property to the west, across Corral de Tierra Road, is a gas station and mini-mart. Properties to the north, south, and east are mostly undeveloped bare ground.

3.0 GEOLOGIC SETTING

The subject property is located at the intersection of Highway 68 and Corral de Tierra Road, approximately midway between Salinas and Monterey in Monterey County. The site is situated in the central section of the larger Coast Range geomorphic and geologic province. Tectonically, Corral de Tierra Canyon lies in a portion of the Coast Range known as the Salinian Block. The Salinian Block consists of Cenozoic age sedimentary rocks overlying older metamorphic and igneous rocks. The overall structural grain of the Salinian Block is oriented northwest-southeast. Corral de Tierra lies in the Sierra de Salinas, which is bounded by the Salinas Valley on the north and Carmel Valley to the south. The Sierra de Salinas itself is fault-controlled, with the orientation of the mountain range paralleling the King City-Reliz/Rinconada fault to the north and the Tularcitos Fault and possibly related smaller faults to the south. Large and small scale faults and folds are characteristic of the Salinian Block.

According to the November 23, 2009 report by Moore Twining Associates, Inc. (Assessment of the potential Impact of the Proposed On-site Stormwater Disposal System on Liquefaction and Seismic Settlement Corral de Tierra Commercial Project), the near surface sediments appear to be recent alluvial deposits of El Toro Creek. The upper native sandy soils in the upper 18 - 40 feet bgs, generally consist of very loose to loose silty sands, clayey sands, poorly graded sands and well graded sands.

RWQCB and MCDEH

4.0 HYDROGEOLOGIC SETTING

The site is in an area of shallow groundwater (approximately 20 - 30 feet below ground surface).

Generally, groundwater flow direction in this area is to the west and towards the Monterey Bay. This water table may not be a permanent water table, and could represent a perched saturated zone.

Groundwater was encountered during installation of the soil borings at approximately 17 feet bgs. Groundwater gradient was found in the groundwater monitoring wells at the site to flow in a southerly direction at .0047 to .0064 ft/ft in August 2011.

It should be noted that flow directions change due to strong local pumping and variations in recharge.

5.0 SCOPE OF WORK

The scope of the investigation proposed herein is as follows:

- 1. Prepare and submit this work plan, site safety plan and associated fees to the RWQCB and MCDEH.
- 2. Once both regulating agencies have approved the work plan demolition plans will be submitted to secure demolition permits. Once the building has been removed from the site a utility survey will be conducted to determine that the expected excavation site is free of all underground utilities.
- 3. A hazardous materials licensed contractor will be utilized to excavate the site. In order to expedite closure of the site all impacted soils will be excavated, confirmation soil sampling will occur in the excavation pit as well as grab groundwater sampling should groundwater be encountered. Excavation activities are to take place until all impacted soil has been removed down to levels at or below the MCDEH action levels.

Soil Sampling to include two to three samples from each wall of the excavation site as well as two to three samples from the bottom of the excavation area. Actual number of samples collected to be determined in the field based on conditions encountered during excavation. A total of 12 to 18 soil samples are expected to be collected from the excavation area, however the actual number of samples collected will be based on the size of the excavation and input from MCDEH. Groundwater is shallow in the area and may represent a perched zone of limited extent. Consequently, removal of the contaminated soil is likely to remove the source of the impacts to the water. Groundwater was encountered at 17 feet bgs in August 2011 and contaminated soil was found at a depth of 21 feet, therefore it is likely that groundwater will be encountered in the excavation pit. Any perched groundwater

RWQCB and **MCDEH**

encountered during excavation will be removed, sampled and containerized pending laboratory results. All collected water will be properly disposed of based on laboratory analysis.

Once the contaminated soil has been removed a grab groundwater sample will be collected to determine if the source of the water contamination has been removed.

Soil and water will be submitted under proper chain of custody handling to a laboratory certified for testing in California. Analysis to include TPH as gasoline, BTEX and MTBE using method 8260B.

- 4. The soil stockpile of excavated material may be quite large. The stockpile will be split into sections of approximately 20 feet by 20 feet and a composite 4:1 sample will be collected from each section. It is impossible to determine how many sections there will be in the stockpile at this point, however the actual number of sections will be determined in the field based on input from the MCDEH inspector on site.
- 5. CapRock will prepare a soil sampling report analyzing the information found during this investigation. The report will contain tabulated results of all laboratory analysis including historical data, soil classification, a description of methods used, and a discussion of the results of the investigation. In addition the report will include conclusions and recommendations based on the results of this investigation.

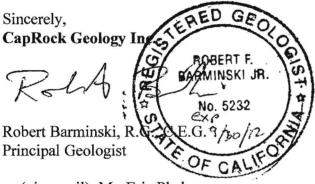
6.0 **REQUIREMENTS**

Project methods will follow guidelines from:

- 1. Leaking Underground Fuel Tank (LUFT) Field Manual: Guidelines for Site Assessment, Cleanup, and Underground Storage Tank Closure (State of California; October, 1989).
- 2. California Department of Water Resources Bulletins 74-81 and 74-90.

7.0 SCHEDULE

Field work activities as outlined in this work plan are contingent upon regulatory approval. In order to ensure efficient excavation of all impacted soil at the site the old gas station building, which has been converted to an office for the Corral de Tierra Realty company, should be removed. The client has requested that the time line for implementation of the excavation work be sufficient to allow for moving of the realty office, permitting for demolition, and demolition and debris removal prior to the excavation. It is expected that CapRock will be ready to proceed with the excavation activities by October 2012. If you have any questions regarding this work plan or the attached Site Health and Safety Plan please call me at (831) 484-5053.



cc (via email): Mr. Eric Phelps

Attachments: Site Health and Safety Plan Figure 1: Location Map Figure 2: Potential Excavation Location Map Figure 3: Route to Hospital



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SITE HEALTH AND SAFETY PLAN

SOIL AND GROUNDWATER INVESTIGATION 7 CORRAL DE TIERRA ROAD SALINAS, CALIFORNIA APN 161-571-002-000

OCTOBER, 2011

1.0 Introduction

This Health and Safety Plan (HSP) is intended to prescribe minimum procedural and equipment requirements for worker protection during implementation of the subject project. All CapRock employees and subcontractors will read and sign this HSP and comply with the practices and procedures outlined in this document. Where a subcontractor has prepared a HSP for this specific project, this CapRock Plan shall be signed by either the preparer of the subcontractor HSP or the subcontractor Project Manager acknowledging that the appropriate provisions of this Plan are included in the subcontractor HSP.

Description of Project

CapRock Geology proposes the excavation of impacted soil in the area where the old USTs were. Soil and groundwater confirmation sampling to occur.

2.0 Authority for Site Safety

The CapRock personnel responsible for project safety are the Project Manager and the Staff Geologist or Engineer. The Project Manager is responsible for implementing the provisions of this Plan, for providing a copy of this Plan to the Staff Geologist or Engineer, and for advising the Staff Geologist or Engineer on health and safety matters. The Project Manager and Staff Geologist have the authority to audit site activities for compliance with the provisions of this Plan. They may suspend or modify work practices or dismiss subcontractors whose conduct does not meet the requirements specified in this Plan.

The Staff Geologist is responsible for communicating the information contained in this Plan to the CapRock personnel assigned to the project and to the responsible representative of each subcontractor working for CapRock on the project.

The Staff Geologist will also act as the Site Safety Officer. As such, the Staff Geologist is responsible for addressing the following items:

- Implementing the site safety plan, company policy, and procedures.
- Requiring and maintaining adequate safety supplies and equipment inventory onsite.
- Conducting daily safety meetings and advising workers regarding hazards.
- Site control, decontamination, and contamination-reduction procedures.
- Reporting accidents or incidents.

The Staff Geologist has the authority to suspend work any time he or she finds that the provisions of the Plan are inadequate for worker safety. The Staff Geologist will inform the Project Manager and the Health and Safety Coordinator promptly of deficiencies within the Plan or individuals or subcontractors whose conduct is not consistent with the requirements of this Plan.

3.0 Safety and Orientation Meeting

Field personnel from CapRock and its subcontractors will attend a project-specific training meeting for safety issues and review the project tasks before beginning work. The meeting will be led by the Project Manager or Staff Geologist . In addition, fit-testing of respiratory protective devices will be conducted as part of the safety orientation meeting when the use of a respirator may be required.

4.0 Hazard Analysis and Risk Assessment

Only workers who need to be in the vicinity of the drilling equipment will be allowed in the work area. The safety equipment specified in Section 8.0, Personnel Protective Equipment, must be worn.

Potential Chemical Hazards

The contaminants likely to be encountered at the site during excavation and remediation activities include gasoline, diesel, benzene, toluene, ethylbenzene, xylenes (BTEX) and lead. Applicable exposure data for these substances are presented in Table 1, HAZARDOUS SUBSTANCE DATA. Potential routes of exposure include: dermal contact by touching contaminated soil, inhalation of dust, and ingestion of the contaminated soil.

Chemical Name	PEL	EL	ED	TWA	CL	STEL
Benzene	1*	-	-	10*	_	5*
Toluene	100*	200*	10 min per 8 hrs	100*	500*	150*
Ethylbenzene	100*	-	-	100*	_	125*
Xylene	100*	200*	30 min per 8 hrs	100*	300*	150*

TABLE 1 - HAZARDOUS SUBSTANCE DATA

Notes: 1. Federal OSHA benzene limits given for PEL and STEL; STEL has a 50 minute duration limit.

2. Federal OSHA gasoline limit given for PEL;STEL is the same for FED-OSHA and ACGIH

3. * - Parts of gas or vapor per million parts air.

Exposure Limits of Anticipated Chemical Contaminants

- (a) PEL Permissible Exposure Limit: 8 hour, time weighted average, California Occupational Safety and Health Administration Standard (CAL-OSHA)
- (b) EL Excursion Limit: maximum concentration of an airborne contaminant to which an employee may be exposed without regard to duration provided the 8 hour time -weighted average for PEL is not exceeded (CAL-OSHA).
- (c) ED Excursion Duration: maximum time period permitted for an exposure above the excursion limit but not exceeding the ceiling limit (CAL-OSHA).
- (d) CL Ceiling Limit: maximum concentration of airborne contaminant which employees may be exposed permitted (CAL-OSHA

- (e) TWA Threshold Limit Value Time Weighted Average is a standard used to regulate work place exposure to hazardous chemicals. It is the concentration of a substance that a worker may be repeatedly exposed, day after day for 8 hours per day, which will not produce an adverse affect.
- (f) STEL Short-Term Exposure Limit: 15 min. time weighted average (ACGIH)

All personnel working in the work area will be instructed to avoid physical contact with the soil to minimize the dermal and ingestion routes of chemical contamination and will be instructed to remove and wash their work garments each day. Also, work at the site will be conducted in a fashion designed to minimize dust generation and workers will be instructed to work upwind of dust or fumes whenever possible minimizing possible inhalation exposure. Dust levels will be maintained below the TLV-TWA (OSHA Standard) of 10 mg/m³ at all times.

Physical Hazards

Physical hazards include falling objects, tripping over equipment, overhead power lines, moving extremities of excavator, flying dirt and debris from excavator, and earthquakes. Prior to the start of work, an area clear of power lines and buildings will be established as the safe zone during an earthquake.

Heat Stress

During conditions of extreme heat, workers will be monitored for heat stress. Adequate liquids and, if necessary, salt will be maintained on-site and will be consumed as needed.

Visitor Safety

No unauthorized personnel may be permitted in the work area at any time. If visitors, etc. enter the area, they should be informed that health and safety procedures have been established to protect both the workers and the public. In the event unauthorized entry occurs, Client should be contacted.

5.0 Employee Training and Information

All CapRock site personnel shall have completed the Basic Hazards Awareness Course provided by the Health and Safety Department. All personnel dealing directly with decontamination activities shall have completed 40 hours of training in accordance with the Code of Federal Regulations (CFR) Title 29, Part 1910.120. In addition, workers shall have completed an annual 8 hour refresher course and 24 hours of on-the-job training. All subcontractor personnel will be similarly trained and required to attend all crew briefings.

6.0 General Safe Work Procedures

- (1) Eating, drinking, chewing gum or tobacco, smoking or any practice that increases the probability of hand to mouth transfer and ingestion of material is prohibited in any area where the possibility of contamination exists.
- (2) Hands must be thoroughly washed upon leaving the area before eating, drinking, or as any other activities transpire. A hand wash station will be setup onsite outside of the general work area.
- (3) Contaminated protective equipment shall not be removed from the area until it has been cleaned or properly packaged and labeled.
- (4) All equipment used in the contaminated work area (including shovels, etc.) will be cleaned with detergent, followed by multiple potable water rinses before leaving the work area. The drilling contractor shall be responsible for supplying a steam generator and for cleaning the drilling equipment.
- (5) Removal of materials from protective clothing or equipment by blowing, shaking, or any other means which may disperse material into the air is prohibited.
- (6) Personnel on-site must use the "buddy" system when wearing any respiratory protective equipment. Communication between members must be maintained at all times. Emergency communication should be prearranged in case of radio breakdown or lack of radios. Visual contact must be maintained between "pairs" on-site and each team should remain in close proximity to assist each other in case of an emergency.
- (7) Personnel should be cautioned to inform each other of subjective symptoms of chemical exposure such as headache, dizziness, nausea, and irritation of the respiratory tract, eyes, or skin.
- (8) No excessive facial hair which interferes with a satisfactory fit of the mask-to-face seal, will be allowed on personnel required to wear respiratory protective equipment.
- (9) All respiratory protection selection, use, and maintenance shall meet the requirements of established CapRock procedures, 29 CFR 1910.134, 8 CAC 5144, and recognized consensus standards [American Industrial Hygiene Association, American National Standard Institute (ANSI), and National Institute for Occupational Safety and Health (NIOSH)].
- (10) Appropriate work areas for support, contamination reduction and exclusion will be established.

- (11) CapRock personnel on-site are to be thoroughly briefed on the anticipated hazards, equipment requirements, safety practices, emergency procedures, and communication methods initially and in daily briefings.
- (12) Steel toe and steel shank work boots, eye protection, gloves, and hard hats will be worn on-site during site investigation and remediation activities.
- (13) No employee or subcontractor will be allowed on-site without the prior knowledge and consent of the Site Safety Officer. All personnel at the site shall be advised on the site safety requirements as discussed in this Plan.
- (14) All contractor or subcontractor personnel shall bring to the attention of the Site Safety Officer or Project Manager any unsafe condition or practice associated with the work activities that they are unable to correct themselves.
- (15) Team members must avoid unnecessary contamination (i.e., walking through known or suspected "hot" zones or contaminated puddles, kneeling or sitting on the ground, leaning against potentially contaminated barrels or equipment.

7.0 Medical Surveillance

Examination Requirements

All CapRock personnel on-site have successfully completed a preplacement or annual periodic/update medical examination in accordance with established CapRock policies and procedures. This examination includes a complete medical and occupational history, physical examination, and selected biological sampling.

Emergency Medical Treatment

In the event of an employee injury or illness requiring emergency medical care beyond the capabilities of on-site CPR (cardiopulmonary resuscitation) and first-aid trained personnel, the following resources will be utilized as appropriate:

- (1) For ambulance, fire, or police phone 911
- (2) Local emergency hospital (24 hour):

Salinas Valley Memorial Hospital 450 East Romie Lane Salinas, CA Telephone: (831) 757-4333 Route: 1-Start out going east on Highway 68 2-Continue straight where Highway 68 turns into South Main Street 3-Turn Right onto E Romie Lane 4-Salinas Valley Memorial is on the Right

The following information must be recorded on the attached form by the Site Safety Officer or Project Manager for any emergency situation as soon as possible:

- (1) Notifier's name;
- (2) Date, time, and location of the incident;
- (3) Nature of emergency (describe what happened);
- (4) Type and amount of materials involved;
- (5) Extent of injuries, if any;
- (6) Agencies and/or organizations notified, names of people notified; and
- (7) Actions taken.

8.0 Personnel Protective Equipment

It is important that personnel protective equipment and safety requirements be appropriate to protect against the potential hazards at the site. Protective equipment will be selected based on the contaminant type(s), concentrations(s), and routes of entry. In situations where the type of materials and possibilities of contact are unknown or hazards are not clearly identifiable, a more subjective determination must be made of the personnel protective equipment.

Levels of Protection*

Level A:	Should be worn when the highest level of respiratory, skin, and eye protection is needed.
Level B:	Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection.
Level C:	Should be selected when the type(s) of airborne substance(s) is known, the concentration(s) is measured, and the criteria for using air-purifying respirators are met.
Level D:	Should not be worn on any site with respiratory or skin hazards. It is primarily a work uniform providing minimal protection.

* As defined by US EPA Interim Standard Operating Safety Guide, Revised September 1982.

It is CapRock's opinion that site investigation/remediation work can be completed in Level "D" protection. This opinion is based on the types of contaminants and the level of concentration in the soils. As necessary, other levels of protection may be selected to ensure healthy, safe work. Level "D" equipment includes:

- Hard hats
- Safety glasses or goggles
- Standard work gloves or rubber type when handling soil
- Steel toed boots or shoes

9.0 Field Operation Work Area

The site must be controlled to reduce accidents and the possibility of exposure to any contaminants present and their transport by personnel or equipment from the site. A controlled system is required to assure that personnel and equipment working at the site are subjected to appropriate health and safety surveillance.

To prevent unnecessary accidents and promote efficient, effective operations within the work area, several measures can be implemented which include:

• Setting up security or physical barriers to exclude unnecessary personnel from the general work area.

- Minimizing the number of personnel and equipment on-site consistent with effective operations.
- Establishing work zones within the site.
- Establishing control points to regulate access to the work area.
- Conducting operations in a manner to reduce the potential for accidents.
- Minimizing the airborne dispersion of dust and/or contaminant(s).
- Implementing appropriate decontamination procedures where necessary.

10.0 Emergency Response Plan

Verbal instructions with or without assistance are used to deal with specific incidents. Horn signals are used to signify an emergency warning. One long blast is used on-site to signify emergency evacuation of the immediate work area to a predetermined location upwind, where a head count will be taken and further instructions given.

In case of an emergency or hazardous situation, the team member that observes this condition shall immediately perform the following:

- (1) Upon hearing of an alarm, all extraneous communications will cease and the member giving the alarm will proceed to give the Project Manager all pertinent information.
- (2) Actions to be taken will be dictated by the emergency.
- (3) Power equipment will be shut down and operators will stand by for instructions.
- (4) First Aid will be administered to stabilize injured personnel and medical attention will be provided as necessary.

The following equipment shall be available at the work site:

- (1) Fire extinguisher dry chemicals
- (2) First aid kit

11.0 Acceptance and Changes to the Site Health and Safety Plan

All personnel involved with site investigation/remediation activities are required to read this Plan and sign in the space provided that they have read this Plan and understand its requirements. Prior to beginning work on the first day of the project, the Site Safety Officer will conduct a site safety meeting to explain the requirement of this Plan and ensure that all personnel are familiar with it. Site safety meetings will be held at the beginning of each work day of the project.

Operating conditions can be expected to change as the work progresses, requiring some modification of this Plan. As appropriate, addenda will be provided by the CapRock Health and Safety Officer with the concurrence of the Project Manager. Such changes will be communicated to all site personnel. The Plan is designed to comply with established CapRock policies and procedures, and applicable Federal and state regulations. Therefore, no changes to the Plan will be authorized without prior approval by the Health and Safety Officer. All CapRock site personnel, site visitors, and subcontractor personnel are subject to the provisions of this directive.

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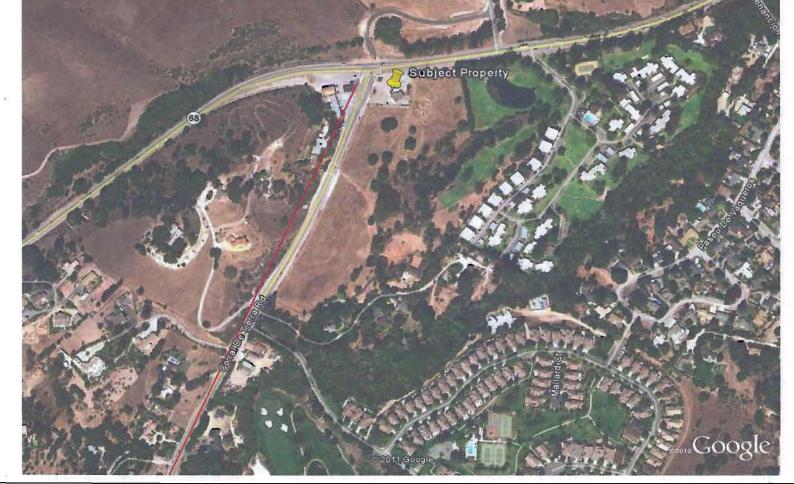
SIGNATURE PAGE

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INCIDENT RESPONSE FORM

1.	DATE/TIME OF INCIDENT:						
2.	LOCATION OF INCIDENT:						
	NAME OF INJURED PARTY	:					
4.	NOTIFIERS NAME:	ERS NAME:					
5.	5. PLEASE LIST DETAILS OF THE INCIDENT (type of injury, equipment involved):						
6.	WERE ANY HAZARDOUS SUBSTANCES INVOLVED? PLEASE LIST TYPES AND AMOUNTS.						
	SUBSTANCE:		AMOUNT:				
_							
7.	EXTENT OF INJURIES:						
8.	PLEASE LIST ANY ACTION	S TAKEN:					
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9.	IF ANY AGENCIES OR O DEPARTMENT, ENVIRONM		DTIFIED, PLEASE LIST (FIRE				





CAPROCK



Environmental, Engineering & Marine Geology

SITE LOCATION MAP 1 Corral de Tierra Road Salinas , CA Reference # 4524

FIGURE

