This plan is acceptable to me for the purpose of addressing the question of copper contamination on parcel 7351-33-9 and whether it impacted groundwater.

Frank and Safouh - is the plan acceptable to DTSC for this purpose as well?

You will need to ask Jeff Dhont about the adequacy of this plan with respect to any other groundwater investigation purpose.

-Dante

Shell proposes to complete a limited groundwater sampling program at the Del Amo site in the near future. The proposed wells, chemical analyses, laboratory methods and rationale are described below.

Water table wells PZL0005 and PZL0010 will be sampled and analyzed for copper (total and dissolved) using EPA Method 6010. The purpose of this analysis is to address concerns expressed by DTSC during a recent Soil and NAPL FS meeting that copper-impacted soil at a former water treatment facility in the butadiene plancor may have impacted groundwater.

MBFC wells SWL0040 and XBF-13 will be sampled and analyzed for VOCs by EPA method 8260. These wells are located in the vicinity of the waste pits and have historically contained elevated concentrations of benzene. The data indicate a trend of decreasing benzene concentrations through time at both wells, but the most recent data for both are from 2000. Given the potential for future pumping-induced migration of benzene, it is important to have current data for this area.

Gage Aquifer well SWL0063 will also be analyzed for VOCs by EPA method 8260. Concerns were expressed by participants in a recent groundwater modeling meeting/teleconference that the benzene at this location may be the result of vertical leakage from the MBFC through the well's annular seal. It was further stated that wells with leaking seals often exhibit an initial trend of increasing concentrations through time. There are currently only limited data over a relatively short period of time for this well, but the benzene concentrations detected to date are relatively consistent: 520 ug/l in July of 2006; 520 in August of 2006; and 550 in October of 2006. The data generated from the proposed sampling will allow additional evaluation of whether benzene concentrations are increasing through time and whether the detected benzene might be due to leakage around the well seal.
Well purging, sample collection, and sample handling for the sampling event will be completed in general accordance with the Standard Operating Procedures outlined in Appendix A of the Field Sampling Plan and Quality Assurance Project Plan, Baseline Groundwater Sampling (URS, January 7, 2004). QA/QC samples will consist of one trip blank sample and as appropriate, one equipment blank sample, which will be analyzed for VOCs.

We are tentatively planning on completing the sampling during the week of October 22, provided access to all wells can be obtained through the various property owners. We will update you if there are any changes to this schedule. A summary of the laboratory analytical results will be compiled upon receipt of the data and provided to EPA, DTSC, and Montrose.

Please contact us to discuss any concerns you may have regarding the proposed sampling program. If the proposed sampling program is acceptable, please acknowledge this with a brief reply to this e-mail.

sincerely,

Erich Weaver
URS Corporation
130 Robin Hill Rd
Santa Barbara CA 93117
805-964-6010
FAX 805-9640259

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