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O/F: 707-528-0810
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September 1, 2016
Project #539.0915
Transmitted to:
yoash.tilles@sonoma-county.org

Mr. Yoash Tilles
Sonoma County PRMD
2550 Ventura Avenue
Santa Rosa, CA 95403-2829

RE: REQUEST FOR GRADING PERMIT EXEMPTION
Wescott Site Remediation Compliance
1569 Sebastopol Road, Santa Rosa, CA
PRMD #GRD16-0161

Dear Mr. Tilles,

On August 29, 2016, Environmental Geology Services (EGS) submitted a partial Grading Permit Application to the Sonoma County PRMD, and spoke with Mr. Yoash Tilles, PRMD. The PRMD issued GRD16-0161 reference number, and EGS paid Grading Permit fees based on the estimated cubic yardage to be removed from the site for environmental reasons.

Per our follow-up conversation with Mr. Tilles regarding a possible exemption from Grading Permit for the referenced site, EGS has reviewed the Sonoma County Code of Ordinances, Chapter 11 – Grading, Drainage, and Vineyard and Orchard development, Article 4, Section 11.020.04 – Exemptions from Grading Permit Requirements, Part C (attached for reference) which states:

> "Environmental Remediation. Grading for environmental remediation ordered **OR** approved by a public agency exercising jurisdiction over a site contaminated with hazardous materials, where the ground surface is restored to its previous topographic condition within sixty (60) days after the completion of the work. The permit authority shall be notified in writing at least thirty (30) days prior to commencement of the work."

Based on the above, the subject site meets these criteria as follows:

- EGS completed an environmental investigation that identified residual hazardous concentrations of lead in the upper 0-12 inches of soils at the site (Report dated March 31, 2016).

- EGS notified the local regulatory agencies including the Sonoma County EHD, Sonoma County FESD, City of Santa Rosa FD, and the North Coast RWQCB and provided these agencies a copy of the March 31, 2016 report.

- The fire departments do not oversee site remediation, but refer them to either the Sonoma County EHD or North Coast RWQCB.

- The Sonoma County EHD deferred this case to the North Coast RWQCB per their letter dated April 14, 2016 (attached for your records).

- On May 18, 2016, EGS spoke with Ms. Beth Lamb, North Coast RWQCB, who notified us that the North Coast RWQCB will be entering the subject site into their regulatory oversight program, overseeing/directing the remediation, and entered the site into the State Geotracker Database (Global ID T10000008931).

- On June 16, 2016, the North Coast RWQCB issued their letter responding to the EGS investigation report. The letter (attached for your records with highlights) assigned a case number to the project (NCRWQCB Case #1NSO944), and *issued a directive (order)* to submit a Work Plan for soil remediation under North Coast RWQCB oversight. The directive to prepare a Work Plan in our opinion meets the stated criteria: "Grading for environmental remediation *ordered* or approved by a public agency exercising jurisdiction over a site contaminated with hazardous materials."

- EGS prepared and submitted our Remedial Soil Excavation Work Plan and Health and Safety Plan dated July 25, 2016 to the North Coast RWQCB for their review (attached for your records).

- On August 25, 2016, the North Coast RWQCB issued their letter (attached for your records) *approving* EGS' prepared and submitted our Remedial Soil Excavation Work Plan and Health and Safety Plan dated July 25, 2016. The NCRWQCB approval letter, in our opinion, meets the stated criteria: "Grading for environmental remediation ordered or *approved* by a public agency exercising jurisdiction over a site contaminated with hazardous materials."

- The Scope of Work for the project will include: Excavation of approximately 2000 CY of lead impacted soil, onsite treatment of the impacted material, and off haul to an appropriate facility.

- In accordance with Sonoma County Code of Ordinances, Chapter 11, Article 4, Section 11.04.020, Part C, EGS will coordinate the import of similar clean material (soil/gravel mixture) to the site to achieve the goal of "…[restoring] the ground surface…to its previous topographic condition within sixty (60) days after the completion of the work."

- In accordance with Sonoma County Code of Ordinances, Chapter 11, Article 4, Section 11.04.020, Part C, "the permit authority shall be notified in writing at least thirty (30) days prior to commencement of the work."

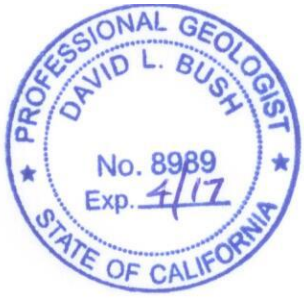
- On August 29, 2016, EGS also applied for an Encroachment Permit with the PRMD (ENC16-0233) since trucks will entering and exiting the subject property during the proposed work onto a County Road (Sebastopol Road).

We trust this provides sufficient information to comply with the Grading Permit Exemption included in Sonoma County Code of Ordinances, Chapter 11, Article 4, Section 11.04.020, Part C.

Should you have questions, or need additional information related to the subject site or the scope of work, please do not hesitate to contact me at 707-528-0810.

Thank you very much for your consideration and time in this matter, I appreciate it.

Sincerely,
Environmental Geology Services



David L. Bush, PG 8989
Principal Geologist

Attachments:

Sonoma County Code of Ordinances, Chapter 11, Article 4, Section 11.04.020, Part C

Sonoma County EHD Letter dated April 14, 2016

North Coast RWQCB Work Plan *Directive* Letter dated June 16, 2016

North Coast RWQCB Work Plan *Approval* Letter dated August 25, 2016

EGS Soil Excavation Work Plan and HASP dated July 15, 2016

cc (via e-mail):

Ms. Liz Wescott, liz@sputtertek.com

Mr. Jack Weaver, jack@weltywelty.com

Ms. Beth Lamb, NCRWQCB, beth.lamb@waterboards.ca.gov

Article 04. Grading Permits.

Sec. 11.04.010. Grading permit requirements.

A. Permit required. A grading permit shall be required prior to commencing any grading or related work, including preparatory site clearing and soil disturbance, except where exempted from permit requirements by section 11.04.020. A separate grading permit shall be required for each site.

B. Grading designation and performance. Grading shall be designated in compliance with table 11-1, and shall be performed as follows:

1. Regular grading. Regular grading shall be performed in compliance with approved plans and specifications prepared by the property owner or a licensed professional acting within the scope of their license.

2. Engineered grading. Engineered grading shall be performed in compliance with approved plans and specifications prepared by a civil engineer.

Table 11-1 Grading Designation

Parameter	Threshold	
	Regular Grading	Engineered Grading
Volume (combined total of cut and fill)	Does not exceed 5,000 cubic yards	Exceeds 5,000 cubic yards
Cut	No greater than 2 feet in depth and does not create a cut slope greater than 5 feet in height	Greater than 2 feet in depth or creates a cut slope greater than 5 feet in height
Fill in the flood-prone urban area or any special flood hazard area	Does not exceed 50 cubic yards	Exceeds 50 cubic yards
Fill outside the flood-prone urban area and any special flood hazard area	No greater than 3 feet in depth	Greater than 3 feet in depth

Natural slope of grading area	No steeper than 15 percent	Steeper than 15 percent
Geologic Hazard Area Combining District	Grading area is not in the Geologic Hazard Area Combining District	Grading area is wholly or partially in the Geologic Hazard Area Combining District[1]
Geologic hazards	Grading area contains no geologic hazards	Grading area contains any geologic hazards[2]

Notes:

1. The engineered grading designation shall apply only to the portion of the grading area that is in the Geologic Hazard Area Combining District.
2. The engineered grading designation shall apply only to the portion of the grading area that is directly affected by the geologic hazards.

(Ord. No. 5988, § I, 5-15-2012)

Sec. 11.04.020. Exemptions from grading permit requirements.

The following activities are exempt from the provisions of section 11.04.010 and may be conducted without obtaining a grading permit, provided that these activities shall still be subject to the standards in article 16.

A. Cemeteries. Routine excavations and fills for graves.

B. Emergency grading. Grading necessary to protect life or property, or to implement erosion prevention measures, where a situation exists that requires immediate action; provided that only the volume of grading necessary to abate an imminent hazard may be performed prior to obtaining a grading permit. The person performing the emergency grading or the property owner shall notify the permit authority and provide evidence acceptable to the permit authority of the scope and necessity of the grading on or before the next business day after the onset of the emergency situation. The person performing the emergency grading or the property owner shall apply for a grading permit within ten (10) days after the commencement of grading. The permit authority may order grading to be stopped or restricted in scope based upon the nature of the emergency.

C. Environmental remediation. Grading for environmental remediation ordered or approved by a public agency exercising regulatory jurisdiction over a site contaminated with hazardous materials, where the ground surface is restored to its previous topographic condition within sixty (60) days after the completion of the work. The permit authority shall be notified in writing at least thirty (30) days prior to the commencement of the work.

D. Excavations subject to valid building permit. Excavations for buildings or structures, where authorized by a valid building permit. This exemption shall not apply to any excavation with an unsupported height greater than five (5) feet after the completion of the structure.

E. Exploratory excavations. Exploratory excavations to investigate subsurface soil conditions and geology, affecting or disturbing an area of less than ten thousand (10,000) square feet and

involving the movement of less than fifty (50) cubic yards, under the direction of a civil engineer, soils engineer, engineering geologist, or registered environmental health specialist, where the ground surface is restored to its previous topographic condition within sixty (60) days after the completion of the work.

F. Fills subject to valid building, agricultural exemption, or demolition permit. Fills for buildings or structures, where authorized by a valid building, agricultural exemption, or demolition permit. Fill that is intended to support structures or surcharges and is greater than one (1) foot in depth shall submit a compaction report as part of the application for the building, agricultural exemption, or demolition permit. This exemption shall not apply to any fill that is engineered grading.

G. Grading subject to valid encroachment permit. Grading within a public right-of-way, where authorized by a valid encroachment permit.

H. Landfills. Grading at landfills regulated by the State Integrated Waste Management Act.

I. Maintenance, repair, or resurfacing of private roads. Maintenance, repair, or resurfacing of existing, lawfully constructed private roads, where the length, width, and design capacity are not changed. This exemption shall not apply to any fill in the flood-prone urban area or any special flood hazard area.

J. Minor cut. A cut that does not exceed fifty (50) cubic yards, and:

1. Is no greater than two (2) feet in depth; or

2. Does not create a cut slope greater than five (5) feet in height and steeper than two (2) units horizontal to one (1) unit vertical (50 percent).

K. Minor fill outside flood-prone urban area and special flood hazard areas. A fill outside the flood-prone urban area and any special flood hazard area that does not exceed fifty (50) cubic yards or alter or obstruct a watercourse, and:

1. Is intended to support structures or surcharges and is no greater than one (1) foot in depth and placed on terrain with a natural slope no steeper than fifteen (15) percent; or

2. Is not intended to support structures or surcharges and is no greater than three (3) feet in depth.

L. Pipelines and utilities. Excavations and fills for pipelines, routine pipeline maintenance practices, or installation, testing, maintenance, or replacement of utility connections, distribution or transmission systems, or telecommunication facilities, on a single site or within a public right-of-way, where the ground surface is restored to its previous topographic condition within sixty (60) days after the completion of the work. This exemption shall not apply to any fill that is used for any purpose other than restoring the ground surface to its previous topographic condition.

M. Public projects. Grading for public projects on public property undertaken by or on behalf of the county or a local agency governed by the board of supervisors.

N. Public trails. Grading for public trails, where a public agency takes full responsibility for the work. The permit authority shall be notified in writing at least thirty (30) days prior to the commencement of the work.

O. Resource conservation, restoration, or enhancement projects. Grading for soil, water, wildlife, or other resource conservation, restoration, or enhancement projects, where a public agency assumes full responsibility for the work. The permit authority shall be notified in writing at least thirty (30) days prior to the commencement of the work.

P. Soil profiling test pits. Excavations for soil profiling test pits, where the ground surface is restored to its previous topographic condition within sixty (60) days after the completion of the work.

Q. Surface mining. Mining, quarrying, excavating, processing, or stockpiling rock, sand, gravel, aggregate, or clay in compliance with chapter 26A of this code.

R. Wells and on-site sewage disposal systems subject to valid well or septic permit. Excavations and fills for wells and on-site sewage disposal systems, where authorized by a valid well or septic permit and the fill material is placed on-site and the placement is shown on the approved well or septic plans.

(Ord. No. 5988, § I, 5-15-2012)

sonoma county
DEPARTMENT OF HEALTH SERVICES
PUBLIC HEALTH DIVISION

Stephan Betz, PhD – Director
Ellen Bauer, PhD, MPP – Division Director

April 14, 2016

Craig Hunt
California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

Re: Environmental Assessment for: 1569 Sebastopol Rd, Santa Rosa, CA 95407
APN: 125-081-030; 125-081-032

Dear Mr. Hunt:

This letter serves as a notice to the North Coast Regional Water Quality Control Board of an environmental assessment conducted at the subject site. Attached is a copy of the report for your review. Based on sample results, oversight by the North Coast Regional Water Quality Control Board may be necessary.

Please contact the undersigned at (707) 565-6523 or Lisa.lamb@sonoma-county.org between 7:30 a.m. to 6:00 p.m. T-F if you have further questions.

Best regards,

Lisa Lamb

Lisa Lamb
Environmental Health Specialist I
Sonoma County Environmental Health & Safety Section

Enclosure

c: David Bush, Environmental Geology Services
Leslye Choate, Program Manager

June 16, 2016

Mr. Robert Wescott
c/o Ms. Liz Wescott
409 Cloverdale Springs Drive
Cloverdale, CA 95425
liz@sputtertek.com

Mr. Rick Barretta
4180 S. Moreland Avenue
Santa Rosa, CA 95407
rbarretta21@gmail.com

Dear Mr. Robert Wescott and Mr. Rick Barretta:

Subject: Phase 2 Environmental Site Assessment and Request for Cost Reimbursement

Site: Wescott's Auto and Truck Parts, 1511 and 1569 Sebastopol Road, Santa Rosa
Case No. 1NSO944

North Coast Regional Water Quality Control Board (Regional Water Board) reviewed the "Phase 2 Environmental Site Assessment (Report)" for the former Wescott's Auto and Truck Parts located at 1511 and 1569 Sebastopol Road, Santa Rosa, California (APN 125-081-030 and 125-081-032). This Report prepared by Environmental Geology Services (EGS) and dated March 31, 2016, presents the results of shallow soil, shallow groundwater and soil vapor sampling conducted at this property.

The Site was a former automotive dismantler which ceased operations in September 1, 2015. Removal of hazardous waste was conducted with oversight of the Sonoma County Fire and Emergency Services Department. Storm water discharges from the facility were regulated in accordance with Water Quality Order 97-03-DWQ NPDES general Permit CA000001.

Regional Water Board staff concurs with the recommendations made by EGS to remediate residual soil impacts at the site. These include:

1) Excavation of impacted soils in the vicinity of the former oil-water separator drop inlet.
2) Shallow excavation of soils in the western portion of the automobile storage yards where residual lead levels exceed human health risk screening levels for lead.

Staff has the following comments on the investigation and cleanup of this property.

- Releases from this property were once suspected of contaminating groundwater from wells on Hampton Way. In August 2010, investigation of this site as a source for this groundwater contamination (Case Number 1NSR285) was closed. No

groundwater samples were collected from this property as part of that investigation. We are now reopening the investigation of releases to the subsurface from activities conducted at this property with a new case number 1NSO944.

- This is an area where groundwater was historically used for water supply and many water supply wells are still in operation in the vicinity of this property. A more complete analysis of potential impacts to groundwater will need to be submitted. Local data on groundwater flow and quality can be obtained from surrounding sites including Frontier Electric, 1599 Hampton Way, Acme Auto Wreckers, 1885 Sebastopol Road, and Bills Texaco, 1980 Sebastopol Road. A sensitive receptor survey which identifies water supply wells (including onsite wells) and potential preferential pathways will need to be submitted for this investigation.

- The California Water Code (Porter-Cologne Water Quality Control Act), Section 13304, allows the Regional Water Board to recover reasonable expenses from a responsible party for overseeing cleanup of unpermitted discharges, contaminated properties, and other unregulated releases adversely affecting the water of the State. Oversight of the investigation and cleanup of this property by Regional Water Board staff will require you to enter into a cost recovery agreement with the Regional Water Board. Attached to this letter we have enclosed a Request for Cost Reimbursement which includes the following attachments: 1) billing cost explanation, 2) explanation of reimbursement process for regulatory oversight, and 3) acknowledgement of receipt form. Please sign the acknowledgement receipt form and return it to this office.

A work plan to perform the recommended remedial measures is now required. The work plan should include a site historical use section which documents past site operations and areas of hazardous waste use. In addition the work plan should include additional information on groundwater impacts including a site receptor survey and conceptual groundwater flow model.

If you have any further question you can contact me at (707) 576-2669 or Beth.Lamb@waterboards.ca.gov.

Sincerely,

Beth Lamb, C.E.G.
Engineering Geologist

160616_BML_er_Wescott ltr1

Enclosure: Request for Cost Reimbursement

August 25, 2016

Mr. Robert Wescott
c/o Ms. Liz Wescott
409 Cloverdale Springs Drive
Cloverdale, CA 95425
liz@sputtertek.com

Mr. Rick Barretta
4180 S. Moreland Avenue
Santa Rosa, CA 95407
rbarretta21@gmail.com

Dear Mr. Robert Wescott and Mr. Rick Barretta:

Subject: Concurrence with Remedial Soil Excavation

Site: Wescott's Auto and Truck Parts, 1511 and 1569 Sebastopol Road, Santa Rosa
Case No. 1NSO944

North Coast Regional Water Quality Control Board (Regional Water Board) reviewed the "Workplan and Health &Safety Plan Remedial Soil Excavation" (Workplan) at the former Wescott's Auto and Truck Parts located at 1511 and 1569 Sebastopol Road, Santa Rosa, California (APN 125-081-030 and 125-081-032). The Workplan dated July 25, 2016 was prepared by Environmental Geology Services. Staff concurs with the proposed scope of work to excavate impacted soils in the vicinity of the drop inlet and former automobile storage yard. In addition, the Workplan proposes to conduct a sensitive receptor survey.

Please submit a report of findings by December 1, 2016. Staff would like to observe the remedial excavation work please inform me when you have scheduled this work so I can plan a site inspection. If you have any further question you can contact me at (707) 576-2669 or Beth.Lamb@waterboards.ca.gov.

Sincerely,

Beth Lamb, C.E.G.
Engineering Geologist

160825_BML_er_Wescott ltr2

cc: David Bush, Environmental Geology Services, dbush@egsconsultants.com

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July 25, 2016
Project 539.0915
beth.lamb@waterboards.ca.gov

Ms. Beth Lamb
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

RE: WORK PLAN AND HEALTH & SAFETY PLAN
REMEDIAL SOIL EXCAVATION
Former Wescott's Auto and Truck Parts
1511 & 1569 Sebastopol Road, Santa Rosa, CA
NC-RWQCB Case No. 1NSO944

Dear Ms. Lamb:

INTRODUCTION

Environmental Geology Services (EGS) has prepared this Work Plan to perform a remedial soil excavation at the referenced site, and in response to the North Coast Regional Water Quality Control Board's (NC-RWQCB) directive letter dated June 16, 2016. EGS completed a Phase 2 Investigation at the subject property located at 1511 and 1569 Sebastopol Road, Santa Rosa, CA (Plate 1, Site Location Map) which resulted in the finding that shallow soils in specific areas of the property have been impacted with residual contaminants related to previous site use activities as an automotive dismantling operation.

The following sections of this Work Plan describes the protocols that will be implemented to remove and dispose of targeted impacted shallow soils, and includes the attached Health & Safety Plan (HASP).

BACKGROUND

The subject site is located at 1511 and 1569 Sebastopol Road, and consists of that real property referred to as Sonoma County APN's 025-081-030 and 032, respectively (Plate 1, Site Location Map). Each parcel is approximately 1.95 +/- acres. The property is accessed on its southern end along Sebastopol Road.

Surrounding site use is mixed use commercial, light industrial and residential as follows:

North - The site is bounded on the north end by the Joe Rodota Trail (operated by the Sonoma County Regional Parks), with vacant land separating the site and trail from US Highway 12 located approximately 375 feet north of the property;

East – Mini-Storage facility adjacent east, mobile home park further east;

South – Mixed use commercial adjacent south along Sebastopol Road, residential further south;

West – Mixed use commercial and light industrial

The western portion of the property (1569 Sebastopol Road, APN 025-081-032) has been historically used as an automotive dismantler and parts sales dating back to at least the 1940's. In 1965, the western parcel was purchased by Mr. Robert Wescott, who began Wescott's Auto and Truck Parts, which consisted of automotive dismantling and parts salvage and sales.

The western portion of the property consists of a 4800+/- SF main site building located on the southwest portion of the site that had been used as the primary office, customer service area and inventory storage building for the Wescott business operation. Adjacent north of this main building is an attached, enclosed 2000+/- SF building that had been used for engine/inventory storage. To the east and north of the main buildings are approximately 3000+/- SF of additional overhead cover with open sides. The remaining area to the north of the structures on the western portion of the subject property was used for the storage of automobiles.

The eastern portion of the overhead covered area of the main building was used for the dismantling of auto parts for salvage, has an aboveground hydraulic lift, had been used for the storage of hazardous materials, and also has an enclosed wash area. In the central portion of the eastern overhang area is the primary drop inlet for the property which collects storm water runoff water from the concrete and asphalt areas of the site. This drop inlet drains to an oil-water separator system located north of the primary structures of the former parts business. After water was processed through the oil-water separator system the water was then discharged to the ground surface to an area approximately 100 feet north of the drop inlet.

The eastern portion of the property (1511 Sebastopol Road, APN 125-081-030) has historically been used as rural residential and walnut orchard and a minor automotive repair business until Mr. Wescott purchased that parcel in the early 1990's. At that time, Mr. Wescott incorporated the northern portion of that property into his dismantling operation for automobile storage, and leased the existing residence. There is currently an existing 1400+/- SF residence, with a two-car garage and additional associated outbuilding located north of the residence. The northern portion of parcel at 1511

Sebastopol Road was historically used as a walnut orchard, and then was incorporated into the Wescott business, used for automobile storage.

In 2010, Mr. Wescott retained George Goobanoff Associates (GGA) to complete a Phase 1 Environmental Site Assessment on the property (GGA Report dated June 14, 2010). Based on GGA's site observations and conclusions, GGA reported no Recognized Environmental Conditions (REC's) on the property. A copy of the GGA Phase 1 ESA will be submitted electronically to the NC-RWQCB, if requested.

On April 1, 2014, the SWRCB adopted Order 2014-0057-DWQ. This General permit became effective on July 1, 2015. Therefore, in accordance with the SRWCB, Mr. Wescott completed a Stormwater Pollution Prevention Plan (SWPPP) prepared by AMEC Foster Wheeler. The SWPPP documents that the subject site's former industrial operations were operated to contain storm water onsite, as referenced by the onsite drop inlet which feeds into the oil-water separator system and discharges on site. Additionally, there are two large areas in the northern portion of the property designated as "ponding areas". Storm water does not runoff the subject site with the exception of a small area on the southern end of the site, where a parking lot is located. A copy of the SWPPP will be submitted electronically to the NC-RWQCB, if requested.

In August/September 2015, Mr. Wescott sold the property to Messrs. Rick and Jason Barretta. As part of the sale agreement, it was understood by involved parties that the buyers (Barretta) would be purchasing the "Real Property and all inventory and equipment thereon," and the seller (Wescott) "retains certain remediation and indemnification obligations with respect to potential contamination issues affecting the Property." Since the time of the sale, the Barretta's have been working to remove the remaining automotive inventory.

As part of their agreement, the Wescott's retained EGS to assist them with identification of residual contamination on the site, as well as assistance with remaining waste disposal and with termination of the SCFESD and NC-RWQCB operating permits. EGS completed an initial inspection of the subject site and identified the following areas of potential suspected contamination:

- A suspected former UST, the location of which was indicated by the former property owner Mr. Wescott on the southern portion of 1511 Sebastopol Road (addressed by soil probe P-1, Plates 2 and 3);
- A former underground hydraulic lift located in the north portion of the main building (addressed by soil probe P-2, Plates 2 and 3);
- The area of the dismantling operation, adjacent to the primary drop inlet (addressed by soil probe P-3, Plates 2 and 3);
- The area of the oil-water separators (addressed by soil probe P-4, Plates 2 and 3);

- The discharge area from the oil-water separators (addressed by soil probe P-5, Plates 2 and 3), and;
- The approximately 3.0+/- acre area where automobiles had been stored (addressed by numerous soil samples collected, Plates 2 and 4).

EGS implemented a Phase 2 Investigation which identified residual contamination related to petroleum hydrocarbons in shallow soils adjacent to the drop inlet, and related to lead in shallow soil associated with the former auto storage yard on the western parcel. EGS submitted the Phase 2 Investigation Report dated March 31, 2016 to the NC-RWQCB for their review, recommending remediation of targeted shallow soil adjacent to the drop inlet and the western portion of the former automobile storage area of the site. Refer to Plates 2 through 4 of this Work Plan for exploratory locations and analytical results, as well as proposed remediation areas. The NC-RWQCB reviewed the Phase 2 Report and responded with a request for a Work Plan to remediate these targeted areas, as well as to complete a Sensitive Receptor Survey for the property.

In conjunction with the Phase 2 work, EGS coordinated the disposal of remaining waste on the property (including the drummed soil cuttings produced during the Phase 2 Investigation) and met with the SCFESD, Mr. Bob Borges on site for his inspection and directives. EGS completed and submitted documentation of waste disposal dated February 29, 2016 to the SCFESD to remove the seller from the CUPA permit #0567. Mr. Borges concurred with deactivating the Wescott's CUPA permit in his e-mail correspondence dated March 18, 2016. The waste disposal documentation is attached to the Phase 2 ESA Report dated March 31, 2016 for reference.

EGS also assisted the Client with the NC-RWQCB Notice of Termination in their storm water program. We coordinated with Mr. Paul Kieran of the NC-RWQCB, and met with him on site to complete his final directives for deactivation from the storm water program. On December 22, 2015, Mr. Kieran, NC-RWQCB, issued their Notice of Termination for site WDID #1491000306.

The following sections of this Work Plan describe the proposed scope of work to remediate shallow soils near the drop inlet area, as well as shallow soils on the western portion of the former automobile storage.

SCOPE OF WORK

The scope of work described in this Work Plan consists of the following:

Task 1: Project management, planning, permitting, and utility clearance;

Task 2: Remedial soil excavation, treatment, and confirmation soil sampling;

Task 3: Laboratory Analysis and review;

Task 4: Waste Disposal;

Task 5: Sensitive Receptor Survey;

Task 6: Geotracker Compliance;

Task 7: Report preparation including our conclusions and recommendations

The following sections present a summary of the above tasks.

PROJECT MANAGEMENT, PLANNING, AND COORDINATION

EGS will coordinate with licensed excavation and remediation subcontractors to determine site access and scheduling to excavate shallow soil in the area of the drop inlet and the northwestern portion of the property (Plates 3 and 4). We will also coordinate the schedule with the NC-RWQCB, the PRMD, our subcontractors, and the current and former property owners.

In this task EGS will obtain a grading permit, if necessary, from the Sonoma County PRMD. We will also coordinate with our subcontracted on site treatment contractor, Soli-Bond, to obtain DTSC permitting for the use of a Transportable Treatment Unit (TTU) for the onsite treatment of residual lead impacted shallow soils. Additionally, we will coordinate with our subcontract excavation company, John's Excavating, to remove soil adjacent to the onsite drop inlet area. We will schedule our subcontractors and notify the involved parties (former and current owner and their attorneys) as well as involved agencies.

Based on the analytical results of the confirmation sampling we perform during the remediation work (described in a following section of this Work Plan) we will consult with various disposal facilities to plan for soil disposal options and gain acceptance. We will also coordinate with our subcontract analytical laboratory to obtain necessary sampling containers and discuss expedited analysis schedules.

Upon final approval of this Work Plan by the NC-RWQCB, EGS will then schedule our licensed contractors to conduct the remedial excavation of shallow soil containing contamination identified in our March 31, 2016 Phase 2 Investigation. The approximate area of proposed remedial excavation is indicated on Plates 3 and 4.

We will advise the Client, current Owner and the regulatory agencies as needed to update them as to the status of the project and the work schedule date and time. We will request the current Owner clear the proposed work area prior to commencing the excavation activities.

At least 48 hours prior to the start of work, EGS will travel to the site to delineate the proposed excavation areas in white paint, and mark the property boundaries. We will notify USA to obtain utility clearance.

REMEDIAL SOIL EXCAVATION

Drop Inlet Soil Excavation and Confirmation Soil Sampling

Once site preparations have been completed, excavation of shallow soils containing residual contamination will proceed. The initial portion of the work will consist of excavating shallow soils near the drop inlet located adjacent to the northeastern portion of the main site building at 1569 Sebastopol Road. This drop inlet collects storm water runoff and drains to the site's oil-water separator system located on the northeast corner of the main building.

Our proposed excavation area is approximately 15 ft x 15 ft, to a maximum depth of 12-15 feet, with an estimated volume of approximately 125 CY (although this is only an estimate). We will remove soils to the extent feasible (based on site constraints) and will only remove soils that are visibly (visually, odors, PID screening, etc) impacted with residual contamination. Where the excavation wall impinges on any structure our Geologist will direct that the excavation wall be sloped to maintain stability of nearby structures. If it is evident that residual contamination is located beneath structural supports, shoring will be used to stabilize existing structures. The volume of soil removed may be less or more depending on field observations of soils / contamination encountered. The proposed drop inlet excavation area, and analytical results of the site Phase 2 soil probes (soil probe P-3 targeted the drop inlet area), is presented on Plate 3 of this Work Plan.

Our subcontract licensed excavation contractor (John's Excavating) will remove the overlying concrete, followed by careful excavation near the drop inlet to identify the subsurface drainage piping. It is likely that the drop inlet and associated piping will be removed during the excavation, and replaced upon completion unless the soil excavation can simply work around these features. Soils will then be excavated, and field soil samples will be collected and screened using a PID instrument. The soils will be placed on visqueen sheeting, stockpiled and covered with visqueen to await proper disposal (described further in a following section of the Work Plan).

Field screening for organic vapors will be performed using a photo-ionization detector (PID), or an equivalent instrument, calibrated to benzene. An approximately 2-inch section of soil will be placed into a zip locked baggie, fractured and agitated, and allowed at least 5 minutes to off-gas prior to screening with the PID. The zip-locked baggie will be labeled as to the date, sample location, and depth. Open only an amount needed to insert the filtered tip of the PID into the zip-locked baggie and immediately re-

seal the baggie. PID measurements will be recorded on field notes and reported in the final report.

Once field screening identifies soils which appear not to be impacted, the excavation will cease, and confirmation soil samples will be collected. EGS will collect confirmation soil samples from each sidewall at two depths, as well as two confirmation samples collected from the bottom of the excavation. Soil samples will be collected with the assistance of the excavation contractor.

Soil samples that require analysis of volatile components (TPH-G/BTEX/MTBE) will be preserved in the field in accordance with EPA Method 5035. Sample containers will be certified clean, 40 mL VOA vials containing dissolved bisulphate solution and a mixing bar, and will be supplied by a State Certified analytical laboratory.

The laboratory provided soil sample vials will include a label with a pre-sample weight measured by the laboratory. Upon collecting a discrete undisturbed soil sample, approximately 5 g of soil will be extracted from the sample using a new laboratory provided disposable plastic syringe with a barrel smaller than the neck of the sample vial to collect the sample. The syringe end of the barrel is cut off prior to sampling. One syringe is needed for each sample aliquot to be collected. The retained portion of the soil sample will be immediately placed into the preservative contained in the vial, and the vial will be sealed. A total of three (3) 5 g preserved soil samples will be collected at each confirmation soils sample location. Additional non-preserved soil will be retained for the analysis of non-volatile constituents (TPH-D/MO).

The confirmation soil samples will be labeled, logged onto a chain of custody form and placed in a chilled, insulated cooler with frozen "blue ice" for delivery to our subcontracted California State Certified analytical laboratory for analysis.

The excavation will remain open, and will be equipped with safety fencing pending the results of the confirmation soil samples. The confirmation soil samples will be submitted to our State Certified analytical laboratory, Analytical Sciences in Petaluma, CAS for expedited analysis (laboratory analysis is further described in a following section of this Work Plan). If the soil analysis identifies residual contamination that exceeds the cleanup goal for this site, additional excavation will occur to the extent feasible in that area followed by further confirmation soil sampling and analysis.

If analytical results are favorable (below the site clean-up goals, refer to a following section of this Work Plan), and the NC-RWQCB verbally authorizes excavation backfilling, EGS and John's Excavating will return to the site to complete the drop inlet area excavation. The drop inlet area will be re-constructed in a manner consistent with pre-excavation activities. The current property owner is planning redevelopment of the property. However, until redevelopment occurs, the site's drainage should function as it currently does (closed system, no off-site storm water runoff).

Clean imported fill will be placed into the excavation pit in 12-inch lifts, and compacted to approximately 90% (no density testing will be performed, and some minor settling may occur). The excavation will be backfilled to within approximately one foot of the ground surface. The surface of the excavation area will be completed with concrete to match the adjacent surface.

Former Auto Storage Yard Soil Excavation and Confirmation Soil Sampling

Based on elevated lead detections in shallow soils (6 to 18 inches bgs) in the area of the site formerly used for automobile storage, EGS proposes to complete a surface scrap excavation to remove these upper soils. The area of the excavation is limited to the western portion of the property (the 1569 Sebastopol Road side), north of the existing structures, and will primarily be to a depth of 6 inches bgs based on the analytical results of the Phase 2 Investigation (Plate 4). There is an area in the northwest portion of the property where EGS identified lead impacts to a depth of 18 inches bgs, and soils will be removed to that depth in that area. We estimate that approximately 2000 CY of material will be removed from the western portion of the former automotive storage area. The proposed excavation limits, sample locations, and lead analytical results are presented on Plate 4 of this Work Plan.

We will remove soils to the extent feasible (based on site constraints) and will only remove soils that are impacted with residual contamination (field screening and confirmation soil samples will be collected as described in a following section). Where the excavation impinges on any structure (i.e. the boundary fence on the western and northern property limits) our Geologist will direct that the excavation wall be sloped to maintain stability of nearby structures, slabs, fencing, etc. The volume removed may be less or more depending on field soils / contamination encountered.

Soils will be removed and stockpiled on site. After the excavation of soil has been completed, EGS will collect confirmation soil samples from both the bottom of the shallow excavation (one sample for every 8,000 SF, or approximately 10 discrete confirmation soil samples) for expedited laboratory analysis. If the soil analysis identifies residual lead contamination that exceeds the cleanup goal for this site, additional excavation will occur to the extent feasible in that area(s) followed by further confirmation soil sampling and analysis. If analytical results are favorable, excavation will cease.

EGS will also collect at least 16 discrete samples (for analysis of four 4:1 composite samples) from the generated soil excavation stockpile for two purposes: 1) to determine the suitability of the excavated material to be disposed of as non-hazardous waste without additional onsite treatment, and 2) if it is determined (based on STLC results of lead) that the waste will need to be treated as Non-RCRA hazardous waste, then the stockpile sampling will establish a baseline of the residual contaminant prior to on site soil treatment.

If it is determined that soils are non-hazardous and do not require onsite treatment, then the soils will simply be profiled for acceptance from a Class 2 landfill facility and removed from the site and disposed of. However, if it is determined that the soil stockpile generated contains residual lead contamination that exceeds the STLC threshold of 5.0 mg/L, then the excavated material (including the material removed from the drop inlet area excavation) will be treated on site using a DTSC permitted Transportable Treatment Unit (TTU).

On site TTU's process soils containing residual contaminants by first removing large particles and debris that exceed 2 inches (typically larger gravels and site debris). Then finer soils containing the residual contaminant enter the TTU where a reagent is added to chemically stabilize the residual contaminant using a cementitiuos type of reaction (essentially coating the soil particles in cement to prevent leaching). After the soil has been treated, it will be stockpiled on site and samples will be collected to verify the soil as non-hazardous for transport to a Class 2 facility.

Field screening for residual lead may include the use of an XRF instrument, although confirmation laboratory analysis would still be required. An approximately 2-inch section of soil will be placed into a zip locked baggie and screened with the XRF. The zip-locked baggie will be labeled as to the date, sample location, and depth. XRF measurements (if used) will be recorded on field notes and reported in the final report.

Confirmation soil samples and soil stockpile samples will be labeled, logged onto a chain of custody form and placed in a chilled, insulated cooler with frozen "blue ice" for delivery to our subcontracted California State Certified analytical laboratory for analysis.

The excavation will remain open until confirmation soil sample analytical results are favorable (below the site clean-up goals, refer to a following section of this Work Plan), and the NC-RWQCB verbally authorizes completion of the excavation backfilling. EGS will then instruct Soli-Bond to backfill the deeper (18 inches) portion of the excavation and then grade the site so that there remains no off site drainage in accordance with the previously developed SWPPP for the site. Once the current owner establishes their redevelopment intentions for the site, a new site drainage and grading plan will be completed. Until that time however, the site should continue to drain and manage storm water runoff as designed (i.e. by use of the drop inlet and oil-water separates system and by having water pond in the northern portion of the property (described in the previously prepared, site specific SWPPP).

Clean-Up Goals and QC

The remedial excavation efforts will include removal of contaminated soil that exceeds the following proposed Cleanup Goals, based on the SFB-RWQCB Tier 1 Soil Environmental Screening Levels (ESL's, February 2016) for the following contaminants of concern (COCs):

TPH-Gasoline	1.0E+02 mg/kg or 100 parts per million
TPH-Diesel	2.3E+02 mg/kg or 230 parts per million
TPH-Motor Oil	5.1E+03 mg/kg or 5100 parts per million
Benzene	4.4E-02 mg/kg or 0.044 parts per million
Toluene	2.9E+00 mg/kg or 2.9 parts per million
Ethyl-benzene	1.4E+00 mg/kg or 1.4 parts per million
Xylenes	2.3E+00 mg/kg or 2.3 parts per million
Lead	8.0E+01 mg/kg or 80 parts per million

These ESLs are proposed recognizing that the NC-RWQCB does not have published ESLs, but uses established ESLs on a site by site basis. The NC-RWQCB might determine different cleanup goals for this site.

Field and laboratory quality control (QC) procedures will include the following:

- Sampling equipment will be decontaminated by steam cleaning and/or washing with phosphate-free detergent and rinsing with potable water;
- Dust control measures will be implemented during the soil excavation activities by wetting the soils during the work;
- A traffic control flag man will be present during the disposal transportation for ingress and egress onto the property;
- Confirmation soil samples will be collected from each sidewall and bottom of the drop inlet excavation, and from approximately every 8,000 SF (10 samples) from the automobile storage area excavation;
- Soil samples from the excavations will be collected using the hand tools (e. g., drive sampler with clean stainless steel tubes, hand driven clean stainless steel tubes, or laboratory supplied glass jars), and with the assistance of the excavation company when needed;
- New gloves will be worn during confirmation sample collection;
- All site personnel will follow the attached Health & Safety Plan, or subcontractors will have their own Health & Safety Plan;

- Soil samples collected from the drop inlet excavation will be preserved in the field in accordance with EPA Method 5035;

- After soil preservation, soil sample containers will be covered with teflon sheets and sealed with plastic caps, labeled, and placed in a chilled, insulated cooler with frozen "blue ice" for delivery to the California State Certified analytical laboratory;

- Samples will be labeled, logged on a Chain-of-Custody Form (CoC) and submitted to the laboratory accompanied by the CoC documentation;

- Laboratory QC will be performed pursuant to the procedures inherent with the specific methods used for analysis;

- Analysis will be performed by a laboratory certified by the State of California for each method of analysis used during the project.

It is not anticipated that groundwater will seep into the excavation. However, if groundwater seeps into and accumulates in the excavation, samples will be collected and analyzed for site COC's.

LABORATORY ANALYSIS AND REVIEW

Since the analytical results of the Phase 2 Investigation resulted in low concentrations of residual contamination limited to contaminants associated with petroleum hydrocarbons (primarily residual gasoline, with *no solvents or PCB's detected*), and limited to shallow soil (<10 feet bgs) near the drop inlet area, the confirmation soil samples collected from the drop inlet area remedial excavation will be analyzed for the following COC's:

- TPH-G/BTEX/MTBE by EPA 8021;
- TPH-D/MO by EPA 8015.

The Phase 2 Investigation primarily resulted in detections of lead and motor oil in the former automobile storage area. However, *all detections* of residual motor oil were well below the recently revised February 2016 ESL of 5100 ppm for this compound, and only the western portion of the former auto storage area resulted in elevated lead above the ESL of 80 ppm. Therefore, the confirmation soil samples collected from the former automobile storage area remedial excavation will be analyzed for the following COC's:

- Lead by EPA 6010.

Confirmation soil samples and waste disposal samples collected as described above will be transported to our subcontract State Certified analytical laboratory for analysis of

the identified Contaminants of Concern. The results of the confirmation and waste disposal soil samples collected from the remedial excavations will be reviewed by our California State Professional Geologist to be incorporated in the final report.

WASTE DISPOSAL

The excavated material produced during the drop inlet area remedial excavation will be placed onto visqueen sheeting and covered with the same. This material (approximately 125 CY) will be disposed of concurrently with the soil produced during the former automobile storage area excavation.

Upon completion of the former auto storage remedial excavation, EGS will collect both confirmation soil samples from the bottom of the excavation to determine if additional excavation is needed, but will also collect waste disposal samples from the excavated material. The preliminary waste disposal stockpile samples will be analyzed for acceptance into a Class 2 landfill. If analytical results indicate residual concentrations of lead are below 50 ppm, or if greater than 50 ppm are less than 5.0 mg/L by STLC, then the excavated material will be profiled and transported to a Class 2 landfill. If concentrations exceed the STLC threshold, then the excavated material will be treated onsite by Soli-Bond using the DTSC permitted TTU. Upon completion of the onsite soil treatment, additional samples will be collected from the treated material to verify that the residual leaching potential of the lead has been stabilized so that the excavated / treated material can be accepted into a Class 2 landfill as non-hazardous waste.

All soil stockpiles will be placed on visqueen sheeting, covered with the same and secured pending analytical results for disposal. In accordance with regulatory requirements, hazardous wastes can be stored on the site a maximum of 90 days, at which time they must be treated or disposed of properly by the owner. If these are "non-hazardous wastes" they may be stored for a longer period. Disposal of such material is a part of this scope of work, and will be coordinated by EGS.

SENSITIVE RECEPTOR SURVEY

As directed by the NC-RWQCB, a Sensitive Receptor Survey (SRS) will be completed as part of this work. The sensitive receptor survey will include reviewing existing SRS reports associated with nearby sites, identifying (verifying) the location of water supply wells within a 1000-foot radius from the site, public and/or municipal wells within a ½ mile radius around the site, identifying surface waters and preferential water pathways, identifying sensitive environmental habitats, and identifying relevant public health and safety issues. This would be accomplished through:

- A site / area reconnaissance and well canvas to visually identify wells or probable wells (1000-foot radius),

- Determination of the local water supply source (private wells, community wells, municipal water supply, etc.)(½ mile radius),

- Preparation of a map showing identified wells and prepare a listing of addresses and owners names,

- Contacting suspected well owners to verify wells existence, use, and alternative water supply,

- Contacting the Department of Water Resources to request a list of documented water supply wells within a ½ mile radius of the subject site,

- Preparation of a map showing surface waters and preferential water pathways (drainage ditches, culverts, storm drains, buried utilities, etc.),

- Preparation of a report documenting the above items and describing relevant public health and safety issues. The report would be prepared by a California Professional Geologist.

GEOTRACKER COMPLIANCE

In accordance with County and State requirements, all data is required to be uploaded to the California State Geotracker database. EGS will be designated as the authorized representative for the site, and EGS will certify that the applicable state regulatory requirements pursuant to Title 23, Division 3, Chapter 30 of the California Code of Regulations, will be complied with for this project. As part of this compliance, EGS will format and upload all required site data including, but not limited to correspondence, analytical data, maps, as well as Work Plans and Reports to the State Geotracker database.

REPORT PREPARATION

Upon NC-RWQCB approval and implementation of this Work Plan, completion of field activities, and receipt of the waste manifests for remedial excavation soil disposal, we will review the results and include the information in our final report. The report will include a description of field procedures, results of analytical testing, a site map showing features relevant to the excavation areas, the SRS, and our conclusions and recommendations for this site. A copy of the report will be provided to the RP (Mr. Wescott), the current owner (Baretta), their respective attorneys, and the NC-RWQCB.

SCHEDULE

Upon approval of this Work Plan by the NC-RWQCB, we will proceed with implementing this Remedial Soil Excavation Work Plan. EGS recommends the NC-RWQCB expedite the approval of this Work Plan so that the impacted soils may be remediated promptly.

LIMITATIONS

This Work Plan has been prepared in accordance with generally accepted plans for environmental soil remediation conducted at this time and in this geographic area. No other guarantees or warranties, express or implied are provided.

Our scope of work does not include a determination of the environmental and public health impact, of known or suspected contamination. This scope does not include providing a risk assessment. Assumptions made about apparent public health risk are based on limited data and will not constitute a formal assessment of risk. If the Client desires a formal risk assessment, such assessment should be requested as a separate scope of work.

The excavation, soil sampling and testing program is intended to provide an assessment of potential soil contamination for specific compounds, at specific locations, and depths, and at specific times. The proposed remediation is not exhaustive, and may not reveal or remediate contamination that may be present at locations (horizontal or vertical) other than those explored, sampled and analyzed. Impacted soils may remain in place after implementation of this Work Plan due to constraints on excavation or other factors. Also, this remediation is not intended to predict future on-site or off-site conditions.

It is understood by the parties hereto that the Client who has requested this Work Plan for remediation will use the results for the stated purpose and no other purpose. No other use or disclosure is intended by Consultant. Client agrees to hold Consultant harmless for any inverse condemnation or devaluation of said property that may result if the Consultant's report or information generated is used for other purposes.

The Work Plan is based on results provided in the March 31, 2016 Phase 2 Investigation, as reviewed by the NC-RWQCB, and in accordance with the NC-RWQCB directive letter dated June 16, 2016. As additional information is discovered during excavation, the scope of work may need to change. Finally, this Work Plan is issued with the understanding that it will be used in its entirety.

We trust this Work Plan is responsive to the NC-RWQCB directives, and provides the level of detail needed for approval. Please contact us with any questions you may have at 707-528-0810.

Sincerely,
Environmental Geology Services

David L. Bush, PG 8989
Principal Geologist

Attachments:
Plate 1 - Site Location Map
Plate 2 – Site Map with Final Sampling Locations
Plate 3 – Soil Probe Analytical Results and Proposed Remediation Area
Plate 4 – Shallow Soil lead Results and Proposed Remediation Area

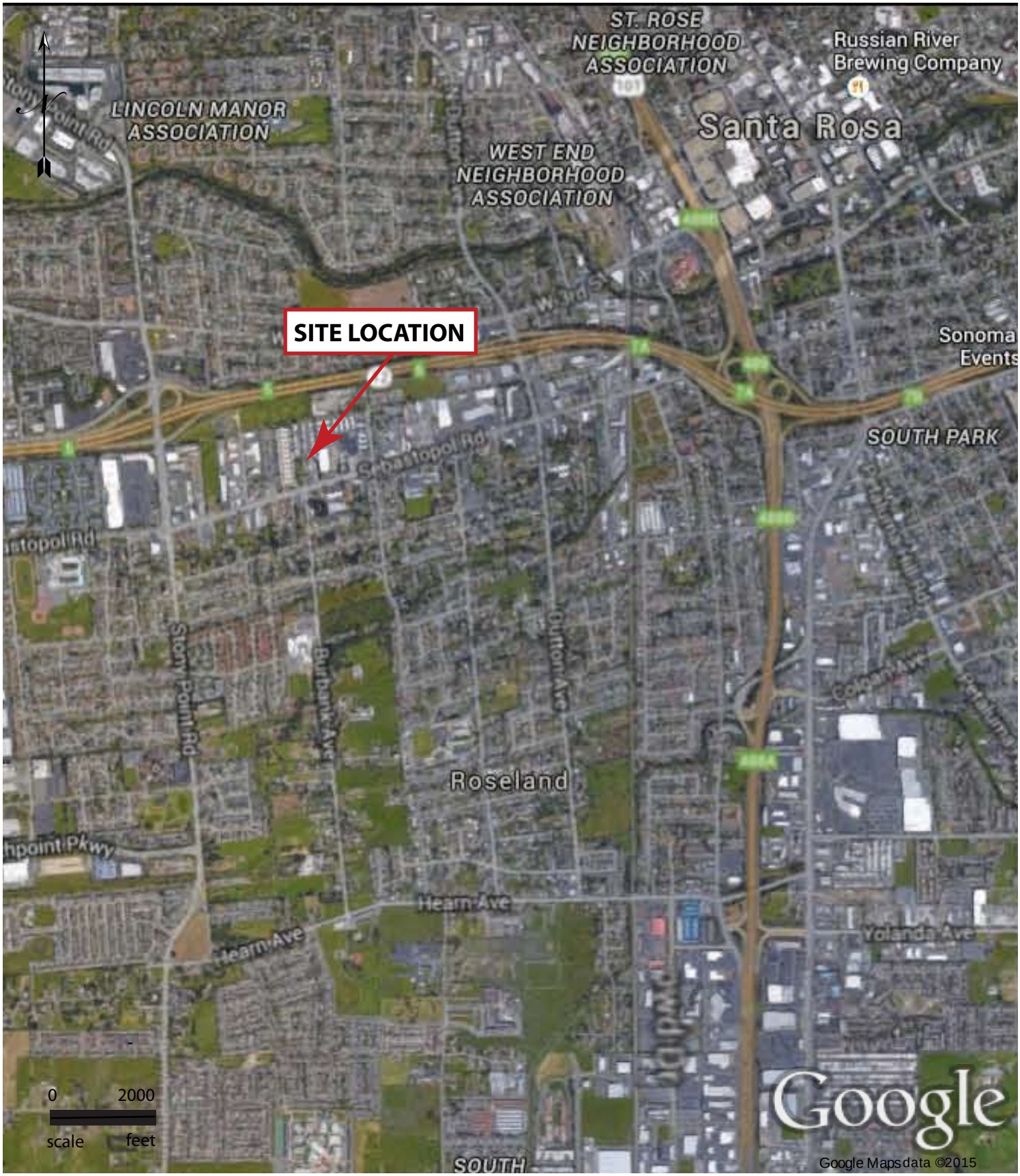
Site Health & Safety Plan

Cc (via PDF):
Mr. Robert Wescott
c/o Ms. Liz Wescott, liz@sputtertek.com

Mr. Jack Weaver (Wescott Attorney)
jack@weltywelty.com

Mr. Lewis Warren (Barretta attorney)
lwarren@abbeylaw.com

Geotracker Database



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M: 707-953-102C

CLIENT: Wescott
PROJECT: 539.0915
DRAFTED BY: DLB
DATE: JUL 2016

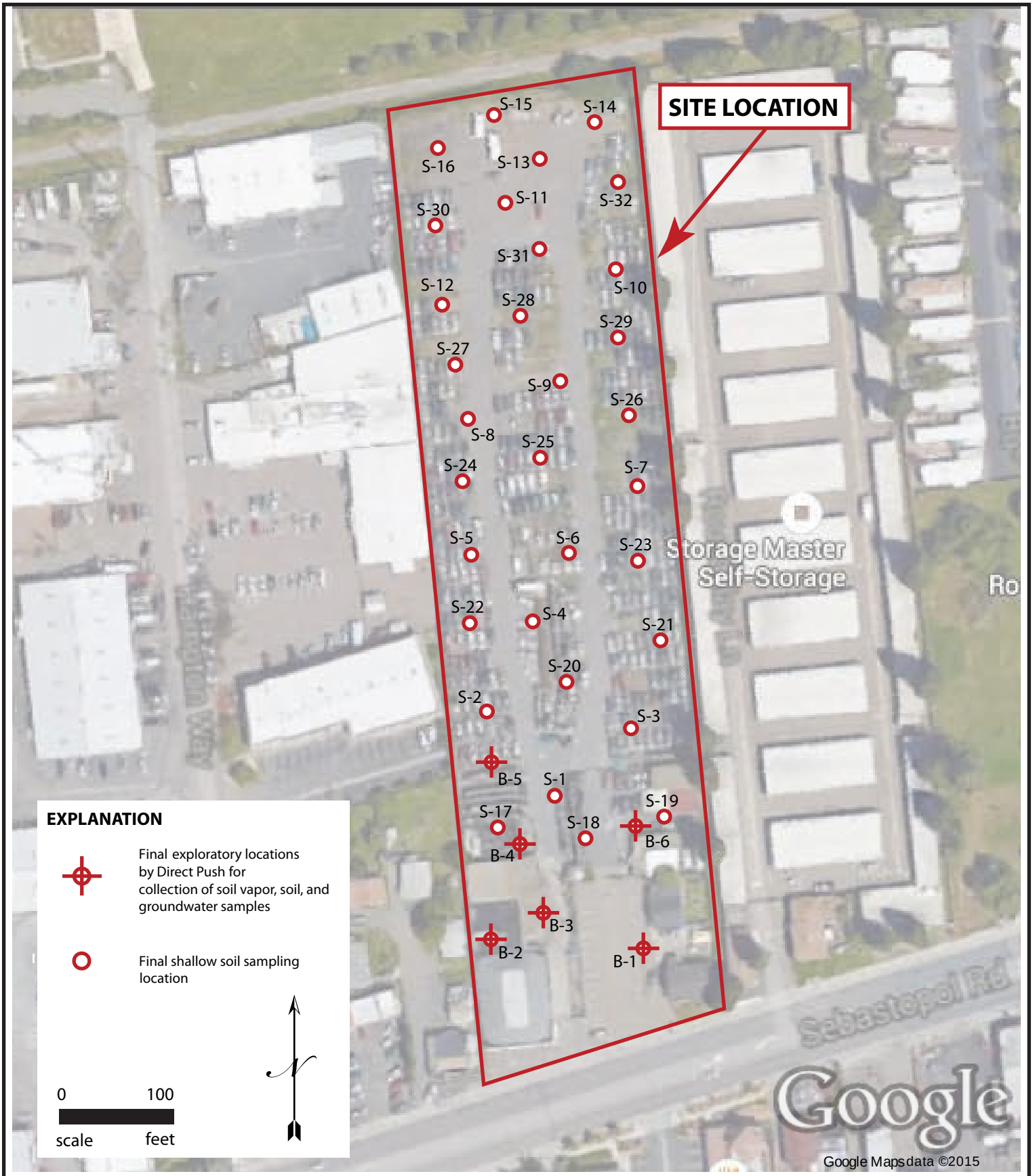
SITE LOCATION MAP

WORK PLAN:
Remedial Soil Excavation

1511 & 1569 Sebastopol Road, Santa Rosa, CA
Sonoma County APNs 125-081-030 & 032

PLATE

1



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SITE MAP with FINAL SAMPLING LOCATIONS

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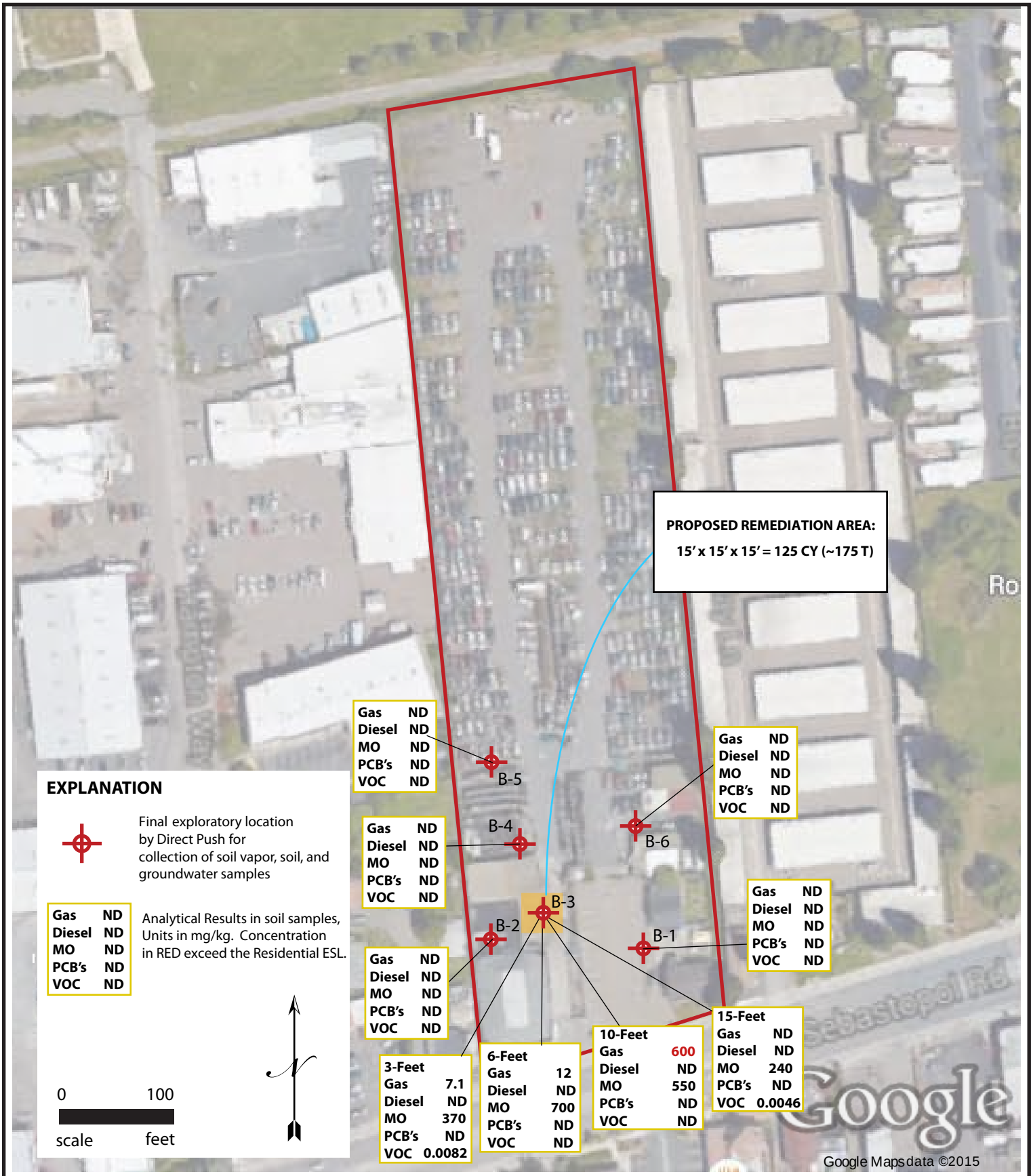
PLATE

2



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SOIL PROBE ANALYTICAL RESULTS and PROPOSED REMEDIATION AREA

WORK PLAN:
Remedial Soil Excavation

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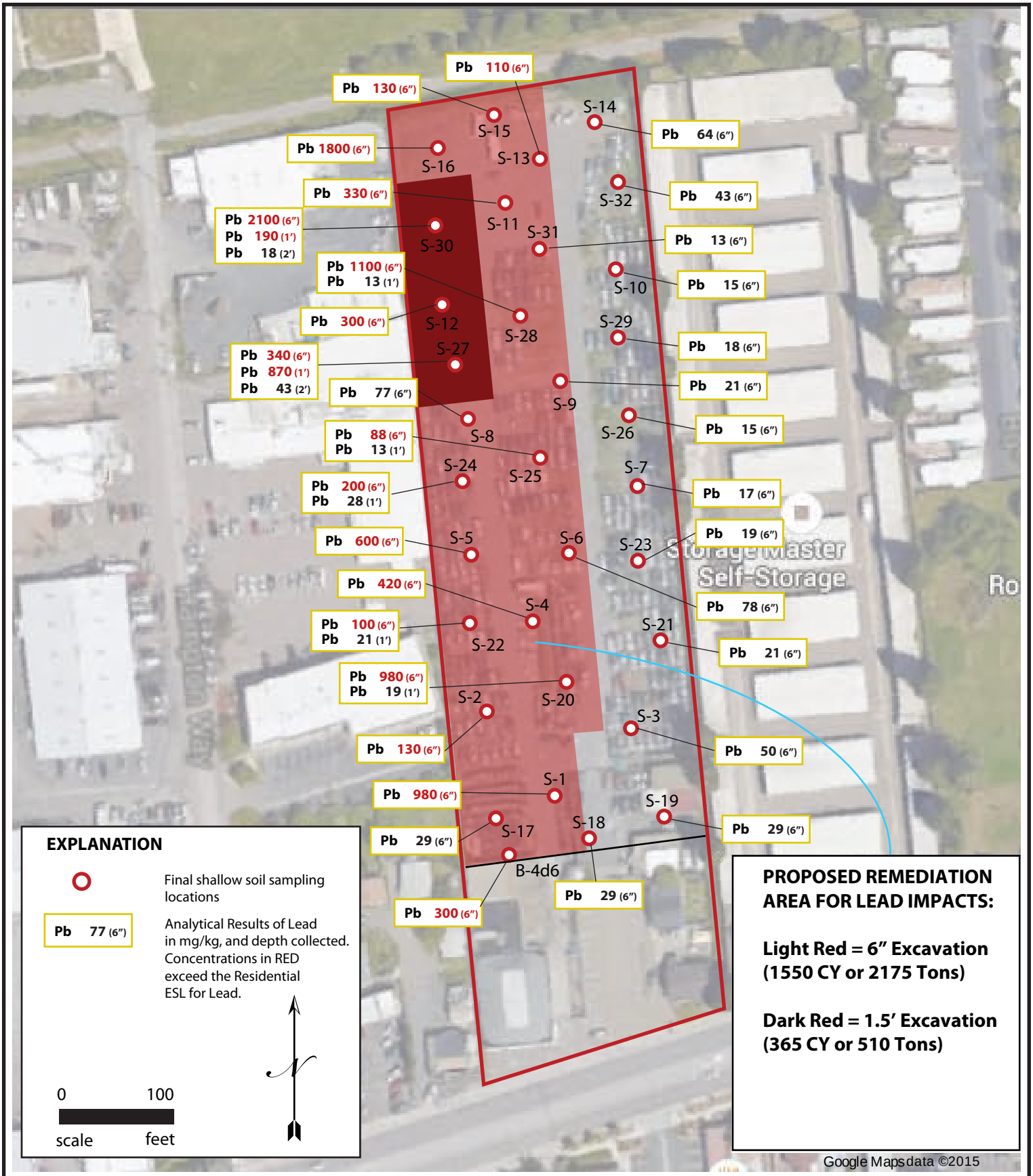
Sonoma County APNs 125-081-030 & 032

PLATE
3



EXPLANATION

Final shallow soil sampling locations

Pb 77 (6″)

Analytical Results of Lead in mg/kg, and depth collected. Concentrations in RED exceed the Residential ESL for Lead.

0 100

scale feet

PROPOSED REMEDIATION AREA FOR LEAD IMPACTS:

Light Red = 6″ Excavation (1550 CY or 2175 Tons)

Dark Red = 1.5′ Excavation (365 CY or 510 Tons)

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DATE: JUL 2016

SHALLOW SOIL LEAD RESULTS and PROPOSED REMEDIATION AREA

WORK PLAN:

Remedial Soil Excavation

1511 & 1569 Sebastopol Road, Santa Rosa, CA
Sonoma County APNs 125-081-030 & 032

PLATE

4

SITE HEALTH & SAFETY PLAN

1511 & 1569 Sebastopol Road, Santa Rosa, CA
NC-RWQCB Case No. 1NSO944

GENERAL INFORMATION:

SITE: 1511 & 1569 Sebastopol Road, Santa Rosa CA

RESPONSIBLE PARTY: Mr. Robert Wescott
409 Clover Springs Drive
Cloverdale, CA 95425

CURRENT OWNER: Jason and Rick Barretta

PLAN PREPARED BY: Environmental Geology Services
6169 Amie Drive, Windsor, CA 95492
707-528-0810

OBJECTIVES: To provide a safety plan for the safe completion of shallow soil remediation by excavation.

PROPOSED DATE OF SITE WORK: Estimated: Aug/Sept 2016

DOCUMENTATION/SUMMARY: Potential petroleum hydrocarbons and fuel related VOCs, as well as possible metals (lead) associated with former auto dismantling operation at low. Site work includes soil excavation to an estimated depth of 15 feet bgs in one area (drop inlet) and to a depth of 18 inches in another area (former auto storage yard).

SITE/WASTE CHARACTERISTICS:

POSSIBLE WASTE TYPES: Solid, fuels and related fuel VOC's (BTEX/MTBE) and motor oil and lead at low concentrations

CHARACTERISTICS: Possible slight to moderate odors and soil staining

FACILITY DESCRIPTION: Former automotive dismantling operation

HAZARDOUS EVALUATION:

PARAMETER: Low hazard / low risk, periodic low to moderate vapors

HEALTH: Ingestion, do not ingest soils, wash hands before eating.

SPECIAL PRECAUTIONS AND COMMENTS

Correct safety procedures must be followed per Health and Safety Plan. Excavation equipment, dust control, and traffic safety are primary concerns. There will be no entry into un-shored excavations exceeding 3 feet deep.

SITE SAFETY WORK PLAN:

PERIMETER ESTABLISHMENT: Use orange traffic cones to secure work area. Identify work area as needed, and site access to be secured to eliminate access by those not associated with the remediation work.

PERSONAL PROTECTION:

Level of Protection:	EPA Level D
Modifications:	Hard Hats, respirator on site
Surveillance Equipment:	PID

SITE ENTRY PROCEDURES: Cone as necessary around equipment and workers as needed. Barricades, portable fencing, and Caution Tape will be used if needed to keep pedestrian traffic at safe distance from storage bin(s), equipment and excavation. A flag man will be present during waste transportation for ingress and egress from site.

DECONTAMINATION PROCEDURES:

Personal:	Wash with detergent and water
Equipment:	Triple wash and rinse and contain wash water in 55-gallon drums

FIRST AID: First aid kit on site

WORK LIMITATIONS: Utilities to be identified & marked per RP consultation. USA notified at least 48 hours in advance.

TEAM COMPOSITION: David L. Bush, PG – Project Geologist, Site Safety Officer.

EMERGENCY INFORMATION:

LOCAL RESOURCES:

Ambulance/Hospital	Dial 911
Police/Sheriff/Highway Patrol	Dial 911
Fire Department	Dial 911

SITE RESOURCES: Fire Extinguisher, First Aid Kit, Telephone and Water.

EMERGENCY CONTACT:

David Bush	(707) 528-0810
On site mobile phone	(707) 953-1020

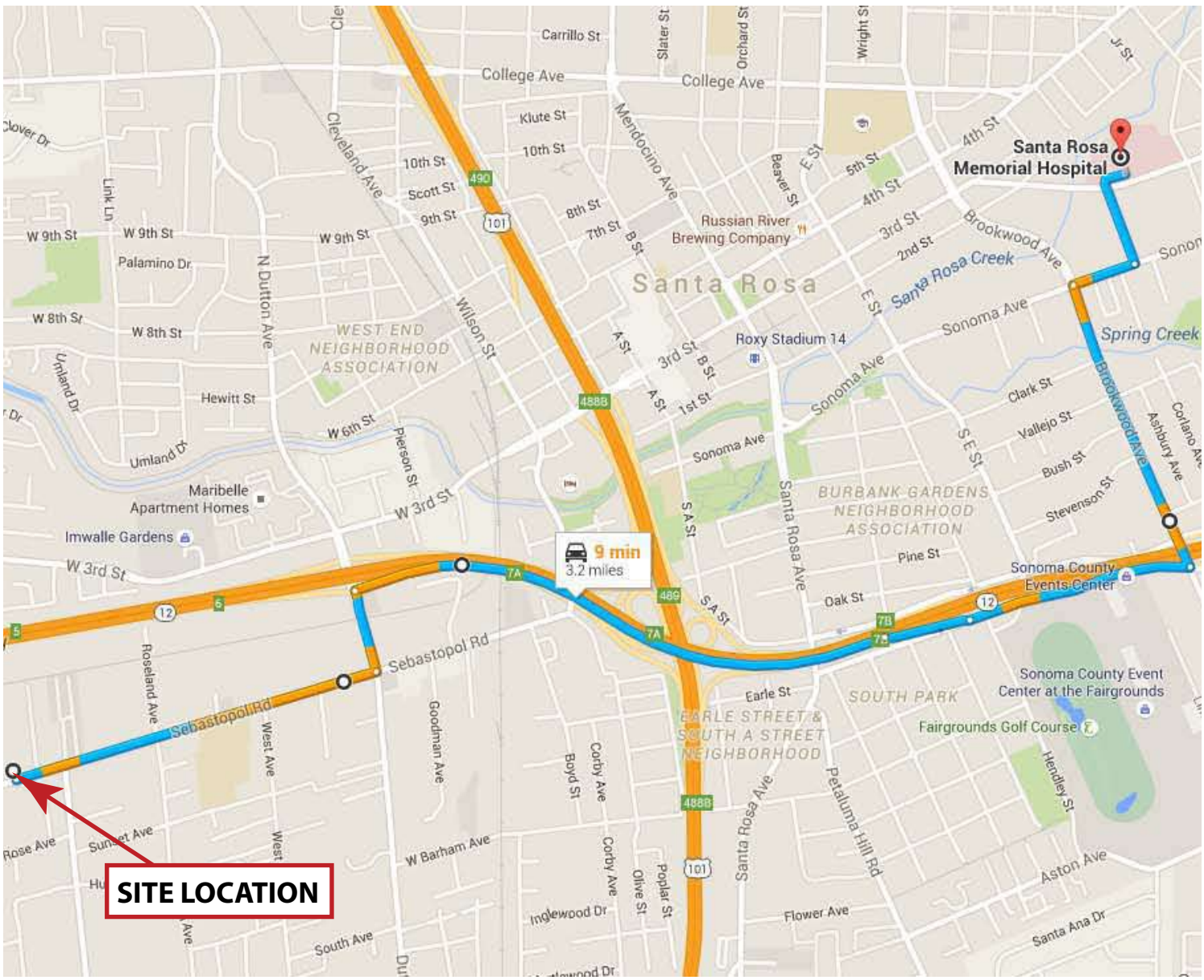
MEDICAL FACILITY - East on Sebastopol Road. Turn left (north) on Dutton Avenue. Enter eastbound on ramp to Highway 12 toward Sonoma. Exit Brookwood Avenue, turn left (north). Turn right on Montgomery Drive. Santa Rosa Memorial Hospital on left at 1165Montgomery Drive. Follow signs to emergency entrance.

Map Attached.

SIGN OFF SHEET

All personnel on site have read and understand the Health & Safety Plan. All personnel will comply with safety procedures:

NAME (Please Print)	RESPONSIBILITY	SIGNATURE



0 2000

scale feet

Google

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HOSPITAL LOCATION MAP

WORK PLAN:
Remedial Soil Excavation

1511 & 1569 Sebastopol Road, Santa Rosa, CA
Sonoma County APNs 125-081-030 & 032

PLATE

HASP