

AND WHEN RECORDED MAIL TO:

Clerk of the Board
Courthouse, Lakeport, Cal.

Clerk of the Board

Jan 29 12 20 PM 1976

790

LAKE COUNTY

COUNTY RECORDER

No 12 12

GRANT DEED

For value received, Patrick Molloy and Virginia M. Molloy, his wife as Joint Tenants, grant to the County of Lake, a Political Subdivision of the State of California, all that real property situate in the County of Lake, State of California, and being a portion of Parcel "B", as the same is shown on that certain Parcel Map, as the same was filed in the office of the Lake County Recorder on December 24, 1975 in Book 10 of Parcel Maps at page 11, and being within the Northeast one-quarter of the Southeast one-quarter of Section 7, Township 13 North, Range 9 West, Mount Diablo Base and Meridian, and being more particularly described as follows;

COMMENCING at the Southeast corner of said Section 7 and running thence North 01° 07' 30" East 1453.78 feet along the East line of said Section 7 to the Northeast corner of that certain tract as conveyed by the County of Lake to Aero Acres, Inc., a California Corporation, by deed recorded on August 6, 1975 in Volume 803 of Official Records of Lake County at page 217; thence along the Northeasterly line of said land so conveyed to Aero Acres, Inc., North 88° 52' 30" West 310.68 feet (West 311.51 feet of record), to the Westerly line of that certain parcel of land as conveyed to the County of Lake by deed recorded March 29, 1963 in Volume 395 of Official Records of Lake County at page 429; thence along the Westerly line of said land so conveyed to the County of Lake, North 32° 49' 42" West (North 36° 45' West of record), a distance of 85.46 feet to the TRUE POINT OF BEGINNING of this description; and running thence, from said TRUE POINT OF BEGINNING South 87° 45' 04" West, a distance of 70.00 feet; thence North 60° 19' 00" West a distance of 496.33 feet; thence South 87° 45' 04" West, a distance of 140.00 feet to the Westerly line of said Parcel "B", as shown in Book 10 of Parcel Maps at page 11; and thence along the Westerly, Northwesterly and Northeasterly lines of said Parcel "B" the following four courses and distances;

- (1) North 02° 07' 22" West a distance of 291.65 feet;
- (2) North 75° 07' 30" East, a distance of 170.00 feet;
- (3) South 60° 19' 00" East, a distance of 215.00 feet; and
- (4) South 32° 49' 42" East, a distance of 554.77 feet to the TRUE POINT OF BEGINNING, and containing 3.860 Acres of land, more or less.

IN WITNESS WHEREOF, the Grantors have hereunto set their hands and signatures this 12th day of JANUARY 1976.

WITNESS:

John E. Dollinger

Patrick Molloy

Virginia M. Molloy

STATE OF CALIFORNIA, COUNTY OF LAKE;

On this 12th day of January 1976, before me, the County Clerk of Lake County, personally appeared John E. Dollinger, personally known to me to be the person whose name is subscribed to the within instrument as a subscribing witness thereto, who, being by me duly sworn deposed and said: that he resides in the County of Lake, State of California; that he was present and saw Patrick Molloy and Virginia M. Molloy

personally known to him to be the persons described in and whose names are subscribed to the within instrument, executed the same; that he, the affiant, subscribed his name as a witness thereto.

LOIS R. HESTERBERG
County Clerk, County of Lake
State of California

BY: [Signature] Deputy Clerk

CERTIFICATION OF ACCEPTANCE

This is to certify that the interest in real property conveyed by the GRANT DEED dated January 21, 1976 from PATRICK MOLLOY and VIRGINIA M. MOLLOY to the County of Lake, a political subdivision, is hereby accepted by order of the Board of Supervisors on JAN 19 1976 and the grantee consents to recordation thereof by its duly authorized officer.

DATED: JAN 20 1976

COUNTY OF LAKE

LOIS R. HESTERBERG
County Clerk

BY: [Signature]

Gov. Code 27281

EXHIBIT B

NOTIFICATION OF PRESENCE OF HAZARDOUS MATERIALS

NOTICE of CONTAMINATION

The groundwater beneath a portion of 600 Sky Park Drive (formally known as 4745 Highland Springs Road), in Lakeport, California, identified by Lake County Assessor's Parcel Number 008-032-62, has been contaminated by pollutants known or suspected to affect human health. The portion of affected land is described in a grant deed recorded in Book 819, Page 476 of Official Records of the County of Lake. **Notice is hereby given that the groundwater at this property cannot be used to provide potable drinking water. The groundwater can only be used for non-consumptive purposes such as irrigation and dust control.** This notice is being provided pursuant to a deed notification covenant and environmental restriction on property recorded in the official records of the County of Lake.

DRAFT CLOSURE EVALUATION REPORT

**Air Power Inc. / Lampson Field
4745 Highland Springs Road
Lakeport, Lake County, California**

PREPARED FOR:

**LAKE COUNTY DEPARTMENT OF PUBLIC WORKS
255 N. FORBES STREET, ROOM 309
LAKEPORT, CALIFORNIA 95453**

PREPARED BY:

**GEOCON CONSULTANTS, INC.
3160 GOLD VALLEY DRIVE, SUITE 800
RANCHO CORDOVA, CALIFORNIA 95742**



GEOCON

GEOCON PROJECT NO. S1787-03-01

AUGUST 2019



Project No. S1787-03-01
August, 2019

VIA ELECTRONIC MAIL

Geoffrey Rader, PE
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670

Subject: DRAFT CLOSURE EVALUATION REPORT
AIR POWER INC./LAMPSON FIELD
4745 HIGHLAND SPRINGS ROAD
LAKEPORT, LAKE COUNTY, CALIFORNIA
CVRWQCB CASE #SL185392911

Mr. Rader:

As requested by the Central Valley Regional Water Quality Control Board (CVRWQCB) and in accordance with our agreement with the County of Lake, dated May 24, 2019, we have prepared this Draft Closure Evaluation Report for Air Power Inc./Lampson Field (the Site) located at 4745 Highland Springs Road in Lakeport, California.

This Draft Closure Evaluation Report summarizes the cumulative soil and groundwater data generated to date and provides information to evaluate the Site for no-further-action status in accordance with State Water Resources Control Board requirements.

We appreciate the opportunity to assist you on this project. Please contact us if you have any questions concerning this report or if we may be of further service.

Sincerely,

GEOCON CONSULTANTS, INC.

Trevor Hartwell, PG
Senior Project Geologist

Jim Brake, PG
Senior Geologist

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FIGURES

1. Vicinity Map
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4. Summary of Laboratory Analysis Results – Soil, TPHg, TPHd, TPHmo, BTEXs, and FOCs
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APPENDICES

- A. Historical Reports
- B. Concentration v. Time Graphs

DRAFT CLOSURE EVALUATION REPORT

1.0 INTRODUCTION

In accordance with the Central Valley Regional Water Quality Control Board's (CVRWQCB's) December 17, 2018, letter, we have prepared this Draft Closure Evaluation Report for the Air Power Inc./Lampson Air Field facility (the Site) located at 4745 Highland Springs Road in Lakeport, Lake County, California (Figure 1). The purpose of this Draft Closure Evaluation Report is to present a cumulative summary of environmental assessment and remedial activities conducted at the Site and based on this summary, present a comparison of site characteristics to the State Water Resources Control Board's (SWRCB) low-threat closure criteria for chlorinated solvent sites.

2.0 SITE DESCRIPTION

2.1 Site Location and Description

The Site is in an area of light industrial and agricultural land uses. The approximate 0.9-acre southeastern portion of Lampson Air Field comprises a machine shop, hangar, offices and workrooms, and an airplane parking area. A former septic system holding tank and leach field are west of the hangar area. A capped sump pit and oil/water separator are located within the hangar area as shown on Figure 2. A drainage ditch is present near the eastern boundary of the Site. Five groundwater monitoring wells (MW-1 through MW-5) are present at the Site.

2.2 Site Geology

Boring logs prepared by Advanced GeoEnvironmental, Inc. (AGE) indicate that soil encountered in the upper 10 feet beneath the Site is uniformly silt. Underlying the silt they encountered thickly interbedded clay, silt, sand, and gravel to approximately 40 feet.

2.3 Site Hydrogeology

AGE installed groundwater monitoring wells MW-1 through MW-5 from 1998 to 2005 at the Site. Depth to groundwater measured in these monitoring wells ranged from approximately 2.85 to 18.05 feet below top of casing from 1998 to 2017. Groundwater flow direction beneath the Site has been variable ranging from toward the northwest to northeast.

On August 16, 2017, CVRWQCB staff measured depth to groundwater in MW-1 through MW-5. Depth to groundwater in these monitoring wells ranged from 10.36 to 10.98 feet with groundwater flow direction calculated toward the northwest. Monitoring well construction details and a summary of groundwater elevation data are in Tables 1 and 2.

3.0 BACKGROUND

Air Power, Inc. (Air Power) operated an aircraft and engine repair facility at the Site from 1977 to 2009. Prior to Air Power's use of the Site, the Site was reportedly used as a hangar for crop-dusting aircraft and storage of pesticides and herbicides applied to nearby agricultural fields. According to Air Power representatives, a disposal system for aircraft engine repair rinseate was installed in the late 1970s. The system consisted of an oil/water separator, a septic system holding tank, and a leach field. In December 1994, the Lake County Environmental Health Division directed Air Power to discontinue operation of the disposal system. The Department of Toxic Substances Control collected surface or near-surface soil samples in the vicinity of the septic system holding tank and the leach field. Water samples were collected from the septic system holding tank, oil/water sumps, and drainage ditch. Laboratory analysis of the samples detected total petroleum hydrocarbons and volatile organic compounds (VOCs) in soil and sludge/water samples collected adjacent to and inside the septic system holding tank and oil/water separator sumps.

On May 26, 1995, Air Power removed the septic system holding tank and capped the associated sump and oil/water separator. In a letter dated May, 26 1995, the CVRWQCB stated that additional soil and groundwater investigation would be required to determine the lateral and vertical extent of hydrocarbon contamination.

On October 24, 1995, AGE began investigating the potential presence of VOCs and petroleum hydrocarbons in soil and groundwater at the Site by advancing borings B1 through B4 to depths ranging from 15 to 20 feet. AGE advanced B1 and B2 inside the building adjacent to the leach field and septic system holding tank, B3 at the former holding tank location, and B4 at the leach field. As shown on Table 3, chlorobenzene was detected in soil sample B3-10 at a concentration of 8.1 milligrams per kilogram (mg/kg). The VOCs 1,2-dichlorobenzene (1,2-DCB) and 1,4-dichlorobenzene (1,4-DCB) were detected in soil samples collected from various depths in B3 and B4 at concentrations ranging from 15 to 31 mg/kg and 5.5 to 35 mg/kg, respectively. VOCs were not detected in soil from B1 or B2. As shown on Table 4, total petroleum hydrocarbons as gasoline (TPHg), diesel (TPHd), and motor oil (TPHmo), benzene, toluene, ethylbenzene, and total xylenes (BTEX) were not detected in any of the soil samples.

As shown on Table 5, 1,2-DCB and 1,4-DCB were detected at concentrations of 31 and 16 micrograms per liter ($\mu\text{g/l}$), respectively, in a grab groundwater sample collected from B1 and at 700 and 300 $\mu\text{g/l}$ in the grab groundwater sample from B2. Methylene chloride, 1,2-DCB, and 1,4-DCB were detected at concentrations of 130, 440, and 220 $\mu\text{g/l}$ in a grab groundwater sample collected from B4.

In September 1996, AGE performed additional investigation of the Site by advancing B5 through B13 at the Site. B10 through B12 were completed as piezometers to monitor first-encountered groundwater beneath the Site. As shown on Table 3, 1,2-DCB was detected at concentrations ranging from 0.39 to 6.6 mg/kg in soil samples collected from B6, B7, B10, and B12. TPHg, TPHd, TPHmo,

and BTEX were not detected in any of the soil samples collected, but were detected in groundwater samples. Chlorobenzene was detected at concentrations ranging from 0.72 to 87 µg/l, 1,2-DCB at concentrations ranging from 1.7 to 2,000 µg/l, 1,3-dichlorobenzene (1,3-DCB) at concentrations ranging from 1 to 110 µg/l, and 1,4-DCB at concentrations ranging from 0.67 to 990 µg/l in grab groundwater samples collected from B5 through B13.

In January 1998, AGE installed groundwater monitoring wells MW-1 and MW-2 to a depth of approximately 20 feet and MW-3 to 40 feet. As shown on Table 3, 1,2-DCB was detected at 0.18 mg/kg, 1,3-DCB at 0.011 mg/kg, and 1,4-DCB at 0.090 mg/kg in a soil sample collected from the boring for MW-3. TPHg, TPHd, TPHmo, and BTEX were not detected in any of the soil samples collected. TPHg, TPHd, TPHmo, and toluene were detected in a groundwater sample collected from MW-3. Chlorobenzene was detected at 2.7 µg/l, 1,2-DCB at 70 µg/l, 1,3-DCB at 3 µg/l, and 1,4-DCB at 34 µg/l in a groundwater sample collected from MW-3.

On June 12, 1998, AGE submitted an *Interim Remediation Work Plan* to the CVRWQCB for hydrogen peroxide injection in selected site wells. In June 1998 and February 1999, approximately 6 gallons of 1% hydrogen peroxide was added to MW-1 through MW-3. In June and July 1998 and February 1999, approximately 2 gallons of 1% hydrogen peroxide was added to piezometers B10 through B12.

In July 2005, AGE advanced B14 to a depth of 20 feet offsite (approximately 15 feet west of the drainage ditch and approximately 50 feet west-northwest of the former holding tank) to assess the lateral extent of TPH and VOC impacted soil and groundwater west of the Site. VOCs (Table 3) and TPHg, TPHd, TPHmo, and BTEX (Table 4) were not detected in any of the soil samples collected. Ethanol was detected at 11 µg/l (Table 5) and TPHg, TPHd, TPHmo, and BTEX were not detected in the groundwater sample collected from B14 (Table 6). AGE destroyed piezometers B10, B11, and B12 by over-drilling the piezometers, and utilized boreholes B10 and B12 to install wells MW-4 and MW-5 to depths of 20.5 and 20 feet, respectively. Monitoring well construction details for MW-1 through MW-5 are in Table 1 and historical groundwater elevation data is in Table 2.

Air Power ceased business operations in 2008 and liquidated its assets in 2009. The Site is currently owned by Lake County and managed by Lake County Department of Public Works. No further investigation or groundwater monitoring was performed at the Site from 2005 until 2017.

On August 16, 2017 and September 18, 2018, the CVRWQCB conducted groundwater monitoring events at the Site. Results from the 2017 and 2018 groundwater monitoring events indicate that chlorobenzene, 1,2-DCB, and 1,4-DCB are still present in groundwater at the Site at elevated concentrations. Results from these groundwater monitoring events are further discussed in Section 5.0.

Historical reports from site investigations are in Appendix A.

4.0 NEARBY WELLS AND SURFACE WATER BODIES

In July 2018, the Lake County Public Works Department conducted a sensitive receptor survey and prepared a map depicting domestic and agricultural supply wells and surface water bodies within a 2,000-foot radius of the Site. The sensitive receptor survey map and tabulated well information were uploaded to the SWRCB's GeoTracker database (<https://geotracker.waterboards.ca.gov>). The map depicts 15 wells, three unnamed drainage ditches, and a pond within a 2,000-foot radius of the Site. Thompson Creek is located outside the 2,000-foot radius at approximately 2,100 feet northeast of the Site. The nearest supply well to the Site is located approximately 600 feet southeast.

5.0 CONFIRMATION GROUNDWATER SAMPLING

In August 2017, CVRWQCB staff collected groundwater samples from MW-1 through MW-5 at the Site. As shown on Table 5, chlorobenzene was detected at concentrations ranging from 50 to 250 µg/l, 1,2-DCB at concentrations ranging from 370 to 1,300 µg/l, 1,3-DCB at concentrations ranging from 49 to 100 µg/l, and 1,4-DCB at concentrations ranging from 160 to 880 µg/l in groundwater samples collected from MW-4 and MW-5. Benzene and bromobenzene were detected at concentrations of 0.9 and 1.9 µg/l in a groundwater sample collected from MW-4. Methyl tert-butyl ether was detected at concentrations of 1.1 µg/l in a groundwater sample collected from MW-2. VOCs were not detected in groundwater samples collected from MW-1 and MW-3.

In September 2018, CVRWQCB staff collected groundwater samples from MW-1, MW-4, MW-5, and the water supply well DW-1. Chlorobenzene was detected at concentrations ranging from 72 to 348 µg/l, 2-chlorotoluene from 1.5 to 7.7 µg/l, 1,2-DCB from 222 to 2,150 µg/l, 1,3-DCB from 35 to 127 µg/l, and 1,4-DCB from 147 to 1,450 µg/l in groundwater samples collected from MW-4 and MW-5. Benzene, bromobenzene, and tert-butylbenzene were detected at concentrations of 1.1, 7.9, and 1.1 µg/l in the groundwater sample collected from MW-4. VOCs were not detected in groundwater samples collected from MW-1 and DW-1 (Table 5).

These results from recent groundwater monitoring indicate that chlorobenzene, 1,2-DCB, and 1,4-DCB remain in groundwater at concentrations exceeding San Francisco Bay Regional Water Quality Control Board's (SFBRWQCB's) Environmental Screening Levels (ESLs) and are considered the primary constituents of concern (COCs). Further discussion and evaluation of these COCs in comparison to regulatory screen levels are discussed in the following section.

6.0 REGULATORY SCREENING LEVELS AND COMPARISON

We compared historical COC concentrations in groundwater and soil to the January 2019 SFBRWQCB's Environmental Screening Levels (ESLs). Vapor sampling has not been conducted at the Site and therefore, no comparisons to ESLs were made.

6.1 Groundwater

The SFBRWQCB's ESLs used for groundwater were derived from SWRCB Maximum Contaminant Levels (MCLs) or Human Health Risk screening levels if no MCL has been established. The MCLs are drinking water standards adopted by the SWRCB, Division of Drinking Water pursuant to the California Safe Drinking Water Act. Primary and secondary MCLs, whichever is less, were used for comparison to the most recent (September 2018) COC concentrations in groundwater. Primary MCLs are derived from health-based criteria while secondary MCLs address aesthetic concerns such as taste and odor. Primary MCLs take into consideration not only health-based criteria, but also technologic and economic constraints.

As shown in the following table, we compared COC concentrations from the most recent groundwater monitoring event (September 2018) to drinking water ESLs (MCLs) and for groundwater vapor intrusion (VI). We used the following assumptions/inputs about the Site when determining which ESLs to use:

- A commercial or industrial land use scenario;
- Minimal vegetation;
- Groundwater as a drinking water source; and
- Shallow and deep soil contamination.

Well ID	Chemical	Concentration	ESL (MCL)	ESL (VI)
		(µg/l)		
MW-4	Chlorobenzene	348	70	1,700
	1,2-DCB	2,150	100	11,000
	1,4-DCB	1,450	5.0	11
MW-5	Chlorobenzene	72	70	1,700
	1,2-DCB	222	100	11,000
	1,4-DCB	147	5.0	11

As shown in the previous table, COC concentrations in groundwater samples from MW-4 and MW-5 exceed ESLs for drinking water (MCL). 1,4-DCB concentrations in both MW-4 and MW-5 exceed the ESL for VI.

6.2 Soil

We compared historical COC concentrations in soil to ESLs for direct contact for any land use, construction worker, using a shallow (≤ 10 feet) and deep (> 10 feet) soil exposure scenario. In addition, we compared COC concentrations in soil to ESLs for commercial or industrial land use using a shallow soil scenario. Using these parameters, 1,4-DCB was the only COC that exceeded an ESL for direct exposure. 1,4-DCB was detected at a concentration of 35 mg/kg in B3-10 (Table 3), which exceeds the commercial or industrial shallow soil ESL of 12 mg/kg.

We also compared historical COC concentrations in soil to ESLs for soil leaching to a groundwater resource. Chlorobenzene, 1,2-DCB, and 1,4-DCB concentrations in soil (Table 3) exceed their respective ESLs for leaching of 1.4, 1.0, and 0.2 mg/kg.

7.0 CONCENTRATION VS TIME TRENDS

We analyzed trends in COC concentrations in groundwater over time by plotting chlorobenzene, 1,2-DCB, and 1,4-DCB concentrations versus time for groundwater samples from MW-4 and MW-5 to estimate when COCs at the Site would meet ESLs. MW-4 and MW-5 are located in the center of the groundwater contaminant plume at the Site.

The graphs also show straight (“best fit”) trendlines that predict when the concentrations will meet each COC’s respective ESL. For concentrations reported as less than the laboratory reporting limit, a value equal to one-half of the reporting limit was used in the plot. Copies of the time versus COC concentration plots are in Appendix B.

Trend analysis results for COCs in groundwater samples from MW-4 are summarized in the following table:

Chemical	Most Recent Concentration (9/18/18)	ESL	Year Expected to Meet ESL
	(µg/l)		
Chlorobenzene	348	70	2021
1,2-DCB	2,150	100	Indeterminate
1,4-DCB	1,450	5.0	2021

1,2-DCB concentrations in MW-4 have exhibited an overall increasing trend since MW-4 was installed in 2005. However, MW-5 is located approximately 30 feet downgradient of MW-4 and 1,2-DCB concentrations in that well have exhibited an overall decreasing trend, indicating that 1,2-DCB is not migrating and is stable in extent. Chlorobenzene and 1,4-DCB concentrations in MW-4 both exhibit decreasing trends.

Chlorobenzene and 1,4-DCB concentrations in MW-4 are expected to meet ESLs in 2021. 1,2-DCB concentrations in MW-4 exhibit an overall increasing trend and therefore, a timeframe to meet ESLs cannot be calculated at this time.

Trend analysis results for COCs in groundwater samples from MW-5 are shown on the following table:

Chemical	Most Recent Concentration (9/18/18)	ESL	Year Expected to Meet ESL
	(µg/l)		
Chlorobenzene	72	70	2018
1,2-DCB	222	100	2019
1,4-DCB	147	5.0	2019

COC concentrations in MW-5 exhibit decreasing trends and are expected to meet or have been met between 2018 and 2019.

8.0 LOW-THREAT CLOSURE CRITERIA EVALUATION

We referenced the SFRWQCB's *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites*, dated July 31, 2009, in addition to SWRCB's Resolution No. 92-49 to evaluate the Site for low-threat closure. Criteria pertinent to Site is outlined in the following sections.

The primary release has been stopped and secondary sources have been addressed to the extent practicable

The source of the release at the Site has been identified as the former septic system holding tank, associated sump pit and oil/water separator. In December 1994, the septic system holding tank was removed and the associated sump pit and oil/water separator were capped. In 1998 and 1999, hydrogen peroxide injections were conducted using MW-1 through MW-3 and piezometers B-10 through B-12. No further remediation has been conducted at the Site since the hydrogen peroxide injections.

The Site has been adequately characterized

As described in Section 3.0, the Site has an extensive history of investigation beginning in 1994. The lateral and vertical extent of COCs in soil have been delineated to concentrations less than their respective direct-exposure ESLs; however, the vertical extent to concentrations less than ESLs for leaching has not been delineated. The lateral extent of COCs in groundwater has been delineated by COC concentrations in groundwater samples from wells MW-1 and MW-2 and the vertical extent has been delineated by COC concentrations in groundwater samples from well MW-3, near the center of the plume.

Soil vapor sampling to assess the potential threat via vapor intrusion to indoor air has not been conducted. However, soil data indicate that minimal contamination in soil beneath the site building and any vapor intrusion to indoor air would likely be a result of COCs in groundwater and not soil. The most recent 1,4-DCB concentrations for MW-4 (located inside the site building) of 1,450 µg/l which exceeds the ESL (VI) of 11 µg/l. AGE boring logs show that low-permeability soil (silt/clay) extends to a depth of at least 10 feet. The use of the site building as an open hangar and the low-permeability of the soil likely mitigate the risks of vapor intrusion to indoor air.

Potential threats to water supply wells, surface water bodies, and other sensitive receptors are mitigated
COCs detected in site groundwater were not present in water supply well DW-1, which is located approximately 600 feet hydraulically upgradient from the Site. The nearest residential wells are approximately 925 and 1,000 feet northeast and southeast of the Site. Due to the horizontal distance, up-gradient locations, and the plume being delineated, it is unlikely that the plume would have a measurable impact on groundwater quality of either Thompson Creek or nearby water supply wells. No other sensitive receptors such as childcare facilities, schools, or hospitals are located near the Site.

In addition, Lake County plans on preparing a deed notification covenant to reduce exposure to residual contamination in soil and groundwater at the Site.

COC plumes in groundwater are decreasing and cleanup standards can be met within a reasonable timeframe

The chlorobenzene, and 1,4-DCB plumes appear to be stable and decreasing. As discussed in Section 7.0, 1,2-DCB concentrations for MW-4 exhibit an overall increasing trend; however, COC concentrations for MW-5, downgradient of MW-4, exhibit an overall decreasing trend. In addition, the vertical extent of COCs in groundwater is delineated by MW-3. This suggests that the plume is stable and not migrating. The increase in 1,2-DCB concentrations for MW-2 are likely due to leaching of residual contaminants from soil to groundwater.

COCs in groundwater are expected to meet ESLs between 2018 and 2021 with the exception of 1,2-DCB in MW-4.

9.0 CONCLUSIONS AND RECOMMENDATIONS

The Site meets most of the criteria for low-threat closure with the exception of the increasing 1,2-DCB concentration trend for MW-4 and the potential exposure to residual contamination in soil and groundwater. Despite an increasing 1,2-DCB concentration trend for MW-4, the COC plumes are decreasing in size. It is our understanding that Lake County intends to prepare a deed notification covenant, which will reduce the risk of exposure to residual contamination at the Site by restricting certain site uses.

Based on the localized extent of soil and groundwater contamination no further investigation, groundwater monitoring, or remediation appears to be warranted. We recommend the Site be issued regulatory *No Further Action* closure status as a low-threat groundwater case provided that a deed notification covenant is in place.

10.0 LIMITATIONS

This report has been prepared exclusively for the CVRWQCB and Lake County. The information obtained is only relevant as of the date of this report. The CVRWQCB and Lake County should recognize that this report is not a comprehensive site characterization and should not be construed as such. The findings presented in this report are predicated on the results of the limited sampling and laboratory analyses described herein.

Therefore, the report should only be deemed conclusive with respect to the information obtained. No guarantee of the results of the study is implied within the intent of this report. The services performed were conducted in accordance with the local standard of care in the geographic region at the time the services were rendered.

