



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

April 5 2007

Mr. Preston W. Brooks
Cox, Castle & Nicholson, LLP
2049 Century Park East, 28th Floor
Los Angeles, California 90067

APPROVAL TO ABANDON WELLS – GREENPARK RUNKLE CANYON DEVELOPMENT, VENTURA COUNTY, CALIFORNIA (SLIC NO. 1111, SITE ID NO. 2040109)

Dear Mr. Brooks:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the May 25, 2006 *Groundwater Sampling Activities* (Report), prepared by Miller Brooks Environmental, Inc. The Report was received on May 26, 2006. The Report provides information on the results of two groundwater sampling events at groundwater monitoring wells MW-1 and MW-2, at the referenced site. The results of prior sampling and analyses were provided to the Regional Board in earlier reports. The wells were installed in May 2004, at the request of the Regional Board, to permit groundwater sampling with correct field techniques, to determine if perchlorate was present in groundwater beneath the site.

The wells were first sampled in May 2004, and then in June 2004, May 2005, June 2005, and March 2006. Perchlorate was not conclusively detected in any validated sample. One duplicate groundwater sample from MW-2, collected in June 2004, contained an estimated 0.33 micrograms per liter perchlorate. However, data validation conducted for this sample indicated that the detection was consistent with laboratory error.

In addition to perchlorate, all samples were analyzed for n-nitrosodimethylamine (n-NDMA). Initial groundwater samples were also analyzed for volatile organic compounds (VOCs). One groundwater sample collected from MW-2 in March of 2006 contained 2.8 nanograms per liter (ng/L) n-NDMA. Traces of VOCs were detected in several groundwater samples; however they were at concentrations well below maximum contaminant levels (MCLs).

Perchlorate has not been detected in groundwater samples collected from wells MW-1 and MW-2, installed specifically to evaluate groundwater for perchlorate, and VOCs were not detected in any of the groundwater samples collected in Runkle Canyon above trace concentrations (well below MCLs). Therefore, the Regional Board does not consider perchlorate or VOCs potential risks to human health or the groundwater resource in Runkle Canyon.

Federal and state drinking water maximum contaminant levels have not been established for n-NDMA and the concentration of 2.8 ng/L n-NDMA is much less than the California Department of Health Services (DHS) response level (200 ng/L) at which the water should be removed from the drinking water supply. The detected concentration is also below the DHS Notification Level (10 ng/L) and the California Office of Environmental Health Hazard Assessment's Draft Public Health Goal (3 ng/L).

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Preston Brooks
Cox, Castle & Nicholson LLP

- 2 -

April 5, 2007

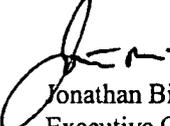
Based on groundwater sample analytical results for perchlorate, VOCs, and n-NDMA, the Regional Board has no further requirements for this site, monitoring wells may be abandoned in accordance with the California Department of Water Resources Bulletins 74-81 and 74-90, California Well Standards. However, prior to abandoning groundwater monitoring wells please provide a copy of the Report to Ventura County Public Works at the following address, for their review and concurrence:

David Penaro, Manager
Water Resources Division
County of Ventura
Public Works Agency
800 South Victoria Avenue
Ventura, CA 93009-1600

Please provide the Regional Board with a well abandonment report within 30 days of well abandonment. The report must include, at a minimum, a site map, a description of the well abandonment process, and copies of all signed permits related to the well abandonment.

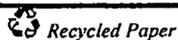
Thank you for your continuing cooperation. **Should you have any questions regarding this letter, please contact Mr. David Bacharowski, AEO at (213) 576-6607, or Mr. Peter Raftery at (213) 576-6724.**

Sincerely,


Jonathan Bishop
Executive Officer

cc David Penaro, Ventura County Public Works Agency

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.