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Arnold Schwarzenegger
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Statement of Basis

Proposed Groundwater Corrective Action Completion Determination

At

**Britannia East Grand
(Slough SSF, LLC, formerly O'Brien/Cherokee Facility)
450 - 660 East Grand Avenue
South San Francisco, CA
San Mateo County**

Prepared by

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June 2007

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Statement of Basis for Soil Remedies at the O'Brien Corporation's Facility located at 450 East Grand Avenue, South San Francisco, CA, (EPA ID# CAD 005 130 455), July 1999, prepared by the U.S. Environmental Protection Agency, Region 9

1.0 INTRODUCTION

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has prepared this Statement of Basis to discuss the proposed completion of groundwater contamination investigation and termination of groundwater corrective action at the former O'Brien Corporation Property (O'Brien or Site or Property), located at 450- 660 East Grand Avenue, South San Francisco, California.

Cherokee San Francisco, LLC (Cherokee) purchased the former O'Brien site on June 30, 1999 and sold it to Slough SSF, LLC (Slough) on December 11, 2000. U.S. Environmental Protection Agency (U.S. EPA) approved the soil remedy on April 26, 2000 (See Appendix 1 for details). The U.S. EPA remedy included a Covenant to Restrict Use of Property (Deed Restriction or Land Use Covenant), which restricts the land use to commercial and industrial use and prohibits using groundwater from beneath the Property. Slough has been responsible for site redevelopment and soil management. Cherokee has been responsible for groundwater contamination investigation and identifying site-specific groundwater cleanup objectives through the Corrective Action process under Resource Conservation and Recovery Act (RCRA) including RCRA Facility Groundwater Investigation (RFI).

In November 2006, DTSC approved Slough's revised soil remedies, which include amending the Land Use Covenant and installing a methane gas mitigation system.

Cherokee's groundwater investigations summarized in the Phase III RFI Report dated August 14, 2005, and Pore Water Report, dated August 29, 2006, have demonstrated that only low concentrations of organic compounds (including hydrocarbons) exist in groundwater beneath the Property, and that these concentrations are below the ecological screening level objectives developed in concert with DTSC (see Section 5.3 for more detail).

This Statement of Basis (SB) also summarizes groundwater investigations completed for this facility. DTSC will finalize completion of groundwater corrective action for the Site only after the public comment period has ended and any information submitted during this time has been reviewed and considered.

DTSC is issuing this SB as part of its public participation responsibilities under the California Health and Safety Code, Chapter 6.5, Hazardous Wastes Control Act. The corrective action process conducted at the Site addressed releases of hazardous waste and hazardous constituents at this Site. The Corrective Action Consent Agreement (Consent Agreement) between Cherokee and DTSC defines the steps and corresponding scope of work for federal RCRA corrective action with respect to the 27-acre paint manufacturing facility formerly owned and/or operated by O'Brien. This SB summarizes information that can be found in greater detail in the Phase III RFI Report, dated August 14, 2005, and the Pore Water Report, dated August 29, 2006. Additional detail can be found in other documents contained in the administrative record for this

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facility. DTSC encourages the public to review these documents in order to gain a more comprehensive understanding of the Site and corrective action activities that have been conducted there.

In addition to this SB, DTSC has prepared a Fact Sheet that summarizes the completion of groundwater corrective action for the Site and provides a notice of public comment period.

DTSC will evaluate public comments regarding the completion of groundwater corrective action and may modify the proposed groundwater corrective action completion designation based on new information or public comments. Therefore, the public is encouraged to review and comment on the proposed completion determination. The public can be involved in the remedy selection process by reviewing the documents during the 45-day public comment period that begins June 5, 2007 and ends July 20, 2007. Groundwater corrective action completion represents the potential endpoint of the groundwater correction action program at the Site.

2.0 PROPOSED ACTION

DTSC is proposing to determine that groundwater correction action is complete with controls at the Site. The Land Use Covenant is an institutional control that remains at the Site, which restricts the land use, soil management, and use of groundwater.

Following completion determination the following groundwater related elements will pertain at the Site:

- Investigation and monitoring of Site groundwater will cease;
- Any remaining groundwater monitoring wells on the Site will be decommissioned according to applicable state and local requirements;
- No groundwater shall be extracted at the Property for purposes other than site remediation or construction; and
- The Corrective Action Consent Agreement between the DTSC and Cherokee will be terminated upon execution of an Operation and Maintenance Agreement or new Corrective Action Consent Agreement with the current Property owner, Slough LLC.

A more detailed discussion of the proposed completion of groundwater corrective action is included in the following sections.

3.0 FACILITY BACKGROUND

3.1 Facility Location and Description

The Site is located at 450-660 East Grand Avenue, South San Francisco, County of San Mateo, and is comprised of approximately 27 acres. The Site is located on the shores of San Francisco Bay in South San Francisco, California, at the east end of East Grand Avenue approximately one mile east of Highway 101 (Figure 1). The Site was the location of manufacturing activities for over 100 years, beginning with the Steiger Terra Cotta Pottery Works (circa 1894) and W.P. Fuller (circa 1898). O'Brien owned the Property from 1968 to 1999, and received RCRA authorization in November 1980 to operate hazardous waste management units. Manufacturing activities at the Site included production of ceramic products and oil and latex paint products. Cherokee purchased the Property in 1999. Slough in 2000 purchased the Property from Cherokee and is redeveloping the Site into a biotechnology research and development business park, including a day-care center. All original manufacturing buildings and offices have been removed and industrial operations ended in 2002.

During the paint manufacturing period, O'Brien generated hazardous waste and managed its hazardous wastes under RCRA in three surface impoundments (ponds), one storage area, and two storage tanks. All of the waste management units were operated under an interim status.

In a September 23, 1987 letter, DHS (DTSC's predecessor) and the U.S. EPA approved a closure plan for the three ponds and two waste storage tanks. DHS approved the certification of closure for the ponds and storage tanks on July 18, 1988. Due to the contamination found in the groundwater onsite, DHS required and the facility submitted a post-closure plan that included a seven year post-closure monitoring period, not the thirty year period described in state and federal regulations. On May 27, 1994, DTSC approved the closure plan of the storage area. On June 30, 1994, DTSC approved the closure certification for the storage area. On August 25, 1999, DTSC determined that post-closure monitoring was no longer required for the ponds based upon the data collected during the closure activities and DTSC granted clean closure for the ponds.

U.S. EPA issued a 3008(h) Administrative Order (Order) to O'Brien on February 24, 1989. The Order required O'Brien to conduct RCRA corrective action to address hazardous constituent releases, including lead and semi-volatile organic compounds from the manufacturing activities into soil and groundwater.

Based on the results of the RFI (Phase I and II) for the Site, U.S. EPA issued a Statement of Basis for Soil Remediation at the O'Brien Corporation's Facility in July 1999 (Appendix 1). U.S. EPA approved the remedy for soil media on April 26, 2000. U.S. EPA's corrective measures for soil included additional site investigation, soil removal, construction of a concrete and asphalt cap, and entering into a deed restriction. U.S. EPA approved the corrective measures implementation for soil, as well

as the Phase II RFI (with conditions) on September 18, 2000. The conditions of approval required further investigation and review of shallow groundwater quality. The approval letter also requested that DTSC assume the role as lead agency for the continuing shallow groundwater investigation.

Cherokee entered into a Deed Restriction on October 4, 2000, and also entered into a Corrective Action and Consent Agreement (CACA) on March 29, 2001 with DTSC. Cherokee has since been conducting shallow groundwater investigation and monitoring. On August 14, 2005, Cherokee submitted the Phase III RCRA Facility Investigation Groundwater Report (Phase III RFI Report) to the DTSC. The Phase III RFI Report summarizes groundwater investigation activities that have occurred at the Site.

After reviewing the Phase III RFI Report, DTSC determined that the only remaining risk was the potential exposure of benthic receptors to undiluted concentrations of nickel in shallow groundwater. In a technical memorandum dated October 24, 2005, DTSC required Cherokee to conduct pore water sampling and evaluate the risks to benthic receptors posed by actual contaminant concentrations in the pore water. On May 24, 2006, DTSC approved the Pore Water Investigation Work Plan. Cherokee completed pore water sampling and submitted the "Pore Water Investigation Summary" (Pore Water Report), dated August 29, 2006, to DTSC.

The Pore Water Report describes the results of pore water sampling and concludes that the nickel concentration does not pose an ecological risk to surface water and benthic receptors. DTSC has reviewed and approved the Pore Water Report, as well as the decommissioning of all remaining monitoring wells at the Site in accordance with all appropriate regulations.

3.2. Environmental Conditions and Land Use

3.2.1 Site Hydrogeology

Three water-bearing, or hydrostratigraphic, units have been identified at the Site on the basis of differences in general stratigraphy, differences in potentiometric levels, and in response to tidal influence. The two uppermost zones occur within the artificial fill, and the Bay Mud and Colluvial Deposits. The third water-bearing zone is the Franciscan Complex Bedrock. Investigation of the Bay Mud and Colluvial Deposits, and the Franciscan Complex Bedrock was completed prior to issuance of the U.S. EPA selected remedy. Investigation of the fill material was conducted under the DTSC CACA, and is further discussed herein. The depth to groundwater is 4–12 feet below ground surface (bgs), varying seasonally. The groundwater flow is in a southeasterly direction towards the San Francisco Bay and the former San Bruno channel. Groundwater usage at the Property is prohibited.

A large portion of the Property was artificially filled with material from unknown sources from 1900 through the 1920's. Although the sources of the fill are unclear, fill materials are believed to have derived from demolition debris from the 1906 San Francisco earthquake, the Steiger Terra Cotta Pottery Works, and other industrial sources. These assumptions were corroborated when large quantities of pottery, glass shards, and other industrial type fill materials were encountered during soil corrective measures in 2000.

The uppermost water-bearing zone occurs within the 10 to 15 feet of artificial fill present over the southern half of the site. The fill zone consists primarily of a heterogeneous mix of silty clays, with sand and gravel in varying proportions. Groundwater in the zone appears to be unconfined. The fill zone is separated from the underlying Bay Mud/Colluvium zone by the relatively impermeable Bay Mud silty clay. This separation is reflected in local differences in water quality, potentiometric level, and reported degree of tidal influence. As observed during excavation of impacted materials during Corrective Measures conducted in 2000, the fill contact with underlying sediments can undulate several feet within very limited areas. The fill material zone pinches out along the northern half of the site, and terminates at the bay margin on the east, but may extend across portions of the drainage channel bordering the Property on the south.

3.2.2 Topography and Surface Drainage

The Property topography ranges from approximately 76 feet above mean sea level on the bedrock outcrop in the northern portion of the Property, to sea level along the southeastern portion of the Property. Surface water flow is towards the Bay on the east and southeast and towards the former San Bruno Channel to the south. Currently, the topography of the Property is in flux as significant changes required by the development plan are implemented.

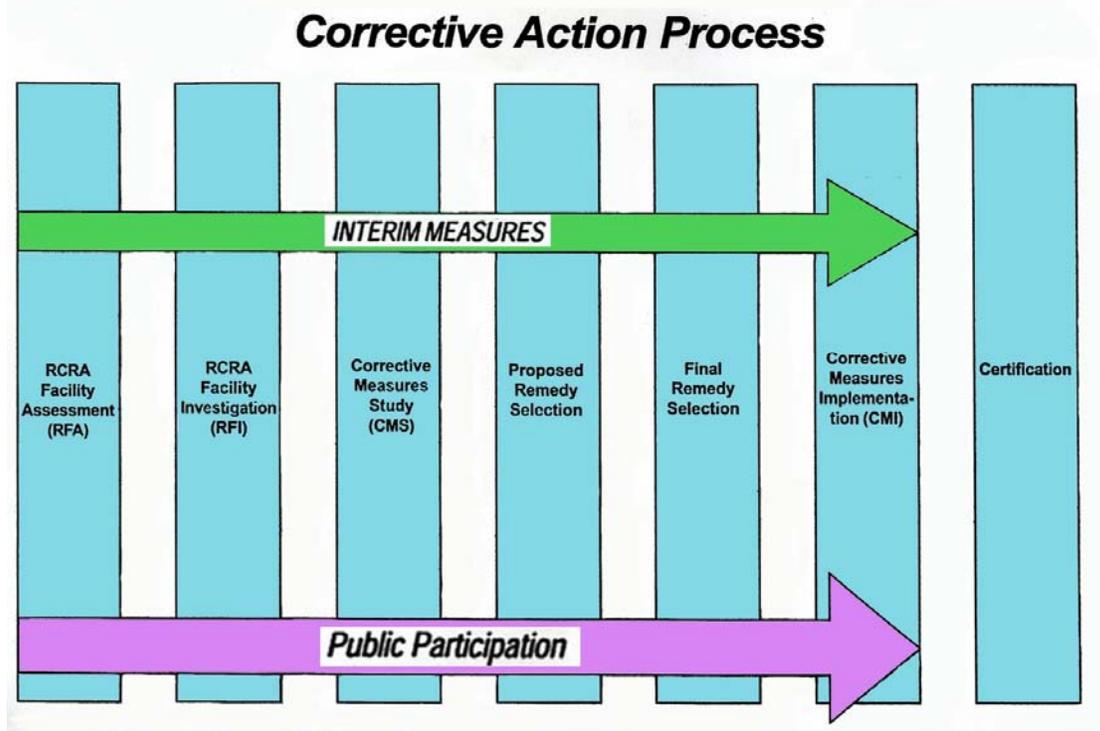
3.2.3 Land Use

A Final Environmental Impact Report (FEIR) was prepared in April 2002 by the City of South San Francisco to assess the environmental impact of the construction of the proposed Britannia East Grand Business Park development at 450 East Grand Avenue. The project was approved, subject to the mitigation measures described in the FEIR (such as implementing a Transportation Demand Management Program and preparing a Soil Management Plan), by the South San Francisco City Council on April 24, 2002.

4.0 RCRA FACILITY ASSESSMENT

In the RCRA Corrective Action program, the initial site assessment is called the RCRA Facility Assessment (RFA) (see diagram of typical corrective action process below). During the RFA, an overseeing agency typically compiles existing information on environmental conditions at a given facility and, as necessary, gathers additional facility-specific information on Solid Waste Management Units and other Areas of Concern, releases, potential releases, release pathways, and receptors. Information gathered during an RFA usually forms the basis for initiating full scale site investigation (RCRA Facility Investigation). A Solid Waste Management Unit means “Any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous wastes. Such units include any area at a facility at which solid wastes have been routinely and systematically released.” An Area of Concern means “any area of a facility under the control or ownership of an owner or operator where a release to the environment of hazardous wastes or hazardous constituents has occurred, is suspected to have occurred, or may occur, regardless of the frequency or duration.” If the facility poses a threat to human health or the environment, DTSC may require corrective action either by a corrective action order, corrective action consent agreement, or through the facility’s permit conditions.

In December 1987, U.S. EPA’s contractor A.T. Kearney completed an RFA and identified 19 Solid Waste Management Units and 6 Areas of Concern. They were described in Table 1 of the U.S. EPA Statement of Basis (Appendix 1).



5.0 RCRA FACILITY INVESTIGATION

The general objective of the RCRA Facility Investigation (RFI) is to thoroughly evaluate the nature and extent of releases of hazardous waste and its constituents. The RFI must include characterization of the facility (process, waste management, etc.), environmental setting, source areas, nature and extent of contamination, migration pathways (transport mechanisms) and all potential receptors. The RFI characterizes the nature and extent of any contamination in and around the facility with soil and groundwater samples. The investigation evaluates whether hazardous wastes or hazardous waste constituents have migrated or may migrate from the facility into the environment through the following pathways: soil, groundwater, and air. Under the U.S. EPA 3008 (h) Administrative Order issued on February 24, 1989, O'Brien conducted an RFI. Investigations completed prior to 1999 were summarized in the U.S. EPA Statement of Basis (Appendix 1). The main contaminant of concern at this site is lead, although arsenic, semi-volatile organic compounds, and total petroleum hydrocarbons (TPH) are also present in lesser concentrations.

Additional groundwater investigations have been conducted between March 2001 and August 2006, under DTSC oversight, and in accordance with the Corrective Action Consent Agreement between DTSC and Cherokee. The investigations are summarized below. Well locations are shown in Figure 2.

5.1 Geomatrix (2001-present)

Geomatrix, a consultant, conducted an investigation of groundwater quality along the southern boundary of the 450 East Grand Avenue property on behalf of Slough during March 2001. The work included cone penetrometer testing (CPT) boreholes and collecting grab groundwater samples at six locations along the southern (downgradient) property boundary. Samples were analyzed for total petroleum hydrocarbon (TPH), volatile organic compounds (VOCs), and metals. Sample results indicated concentrations protective of the environment, with the exception of elevated TPH concentrations next to the former aboveground storage tank (AST) farm. These elevated TPH concentrations suggested that free product might exist in shallow groundwater beneath the former AST farm. Geomatrix presented the findings of this investigation in a letter report titled *Additional Groundwater Analytical Results*, May 18, 2001.

5.2 The Source Group (2002)

The Source Group, a consultant, investigated the former AST farm vicinity at the Site after the decommissioning of the AST farm in early 2002. Seven soil borings were advanced and six groundwater samples were collected. Review of these sampling results indicated that areas of hydrocarbons and naphthalene existed in groundwater

beneath the former AST farm area. The findings of this investigation were documented in the *Soil And Groundwater Sampling Report*, May 23, 2002.

5.3 EnviroAssets, Inc. (2001-2006)

EnviroAssets, Inc., a consultant, assumed groundwater monitoring duties in September 2001. From September 2001 through June 2002, shallow groundwater monitoring wells MW-11, MW-21, MW-21, MW-30, MW-31, MW-32, PM-09, and PM-14 were monitored on a quarterly basis. Following the June 2002 monitoring event, the DTSC approved terminating monitoring of wells MW-11, MW-21, MW-21, 32, PM-09, and PM-14. Per DTSC request, monitoring of groundwater quality in wells MW-30, MW-31, and MW-32 was continued for two additional quarters.

On July 26, 2002, EnviroAssets submitted a *Groundwater Quality and Appropriate Groundwater Standards Evaluation*. Based upon this report and subsequent correspondence, concentration based ecological screening values (ESVs) for surface water were approved by DTSC as a "mechanism to evaluate groundwater quality" (DTSC, May 28, 2004). The decision to use ecological screening values for surface water as site-specific media cleanup objectives for evaluation of shallow groundwater quality at the Property was based upon the following key elements:

- The executed Deed Restrictions for the Property that include prohibitions on beneficial use of groundwater beneath the Property; and
- The absence of chemicals of concern in groundwater at concentrations that present a significant threat to human health.

In November 2002, EnviroAssets continued investigation of the former AST farm in the southwestern portion of the Property. EnviroAssets performed field observation and head-space screening of soil during removal of the concrete slab beneath the former AST farm, followed by excavation of four test pits to the depth of the first encountered groundwater in order to directly observe subsurface conditions at the former AST farm. Although no significant free product was observed, oily sheen and organic matter were observed on the surface of the water in three of the test pits, and a naphthalene-like odor was noted. Results of this screening investigation were presented in *Screening Summary for Former Southwestern Above Ground Storage Tank Farm* (EnviroAssets, December 20, 2002).

Following review of the screening summary for the former southwestern aboveground storage tank farm, DTSC required installation of two wells in the vicinity of the former AST farm (wells MW-40 and MW-41, installed August 18, 2003), collection of grab groundwater samples from a portion of the eastern property between wells MW-31 and MW-32 (temporary sample points WG-1, WG-2, and WG-3, August 18, 2003), and methyl mercury sampling from well PM-09 (August 21, 2003). EnviroAssets' revised *Work Plan For Additional Groundwater Investigation* (EnviroAssets, June 10, 2003) was approved by DTSC on June 13, 2003. The *Additional Groundwater Investigation*

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Summary Report documenting the investigatory activities was submitted to DTSC on November 7, 2003. Based upon these new data, DTSC approved termination of monitoring from all but the two newest shallow groundwater monitoring wells, MW-40 and MW-41.

After completing two additional monitoring rounds of groundwater from wells MW-40 and MW-41, EnviroAssets submitted a *Semiannual Groundwater Monitoring Summary and Request For Termination of Groundwater Monitoring Program* on March 17, 2005. The request for termination was approved by DTSC as concentrations of detected chemicals in samples collected from MW-40 and MW-41 were considerably below approved environmental screening values since the inception of monitoring of water within the wells. With this approval, termination of the shallow groundwater monitoring well program was completed. All groundwater monitoring wells were abandoned under San Mateo County Health Services (SMCHS) oversight.

DTSC required submittal of a comprehensive final RFI Report that incorporated all groundwater data collected at the site and all data associated with previous groundwater characterization activities.

On August 14, 2005, EnviroAssets submitted the Phase III RFI Report to DTSC. After reviewing the Phase III RFI Report, DTSC determined that the only remaining risk was the potential exposure of benthic receptors to undiluted concentrations of nickel in shallow groundwater. In a technical memorandum dated October 24, 2005, DTSC required Cherokee to conduct pore water sampling and evaluate the risks to benthic receptors posed by actual contaminant concentrations in the pore water. EnviroAssets completed pore water sampling and submitted to DTSC the "Pore Water Investigation Summary" (Pore Water Report), dated August 29, 2006.

The Pore Water Report describes the results of pore water sampling and concludes that the nickel concentration does not pose an ecological risk to surface water and benthic receptors. DTSC approved the Pore Water Report on December 7, 2006.

6.0 SUMMARY OF FACILITY RISKS

During the RFI, groundwater data were reviewed against established risk based standards, i.e. ecological screening values. The decision to use ecological screening values for surface water as site-specific media cleanup objectives for evaluation of shallow groundwater quality at the Property was based upon the following key elements:

- The executed Deed Restrictions for the Property that include prohibitions on beneficial use of groundwater beneath the Property; and
- The absence of chemicals of concern in groundwater at concentrations that present a significant threat to human health.

Analytical results from the shallow groundwater investigation, including sampling of pore water at the interface between the Property and San Francisco Bay were evaluated against ecological screening values. The evaluation indicates that the shallow groundwater at the Property does not present a risk to ecological receptors in San Francisco Bay.

7.0 SCOPE OF CORRECTIVE ACTION

Based upon results of the RFI, the site-specific media cleanup objectives have been met, and the shallow groundwater at the Property does not require any additional corrective action or measures. Additionally, the amended Land Use Covenant continues to prohibit using groundwater from beneath the Property. Therefore, the shallow groundwater investigation results at the Property indicate that corrective action at the Site has been completed. The corrective action process will be terminated at the RFI stage. Further steps, such as the Corrective Measures Study, are not necessary since cleanup objectives for shallow groundwater have been met.

8.0 PUBLIC PARTICIPATION

DTSC is now formally soliciting public comments on these documents during a 45-day comment period. DTSC is proposing to issue a determination that groundwater corrective action at the Site is complete. The public comment period begins June 5, 2007 and ends July 20, 2007.

Public input on the proposed determination, and on the information that supports this determination, is an important contribution to the selection process. DTSC will consider all public comments received before determining if corrective action for groundwater at the Site should be deemed complete.

The Phase III RFI Report and Pore Water Report are available for review at:

Grand Avenue Branch Library
603 Walnut Avenue
South San Francisco, CA 94080

The complete administrative records will be available for public review at:

Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710
(510) 540-3800

In addition, this Statement of Basis and other Site documents are available on the DTSC website at: <http://www.dtsc.ca.gov/HazardousWaste/Projects/Britannia.cfm>

All written comments on the proposed remedy selection should be received at the following address by July 20, 2007:

Mr. John Bystra
Hazardous Substances Engineer
Standardized Permitting and Corrective Action Branch
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

To obtain additional information or if you have questions regarding the former O'Brien Facility (the Site), please contact Mr. John Bystra of DTSC at (916) 255-3669 or JBystra@dtsc.ca.gov.

9.0 KEY REFERENCES

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- Resource Conservation And Recovery Act (RCRA). March 8, 1989. RCRA 3008(h) Administrative Order ("Order"). USEPA Docket No. RCRA-09-89-0016.
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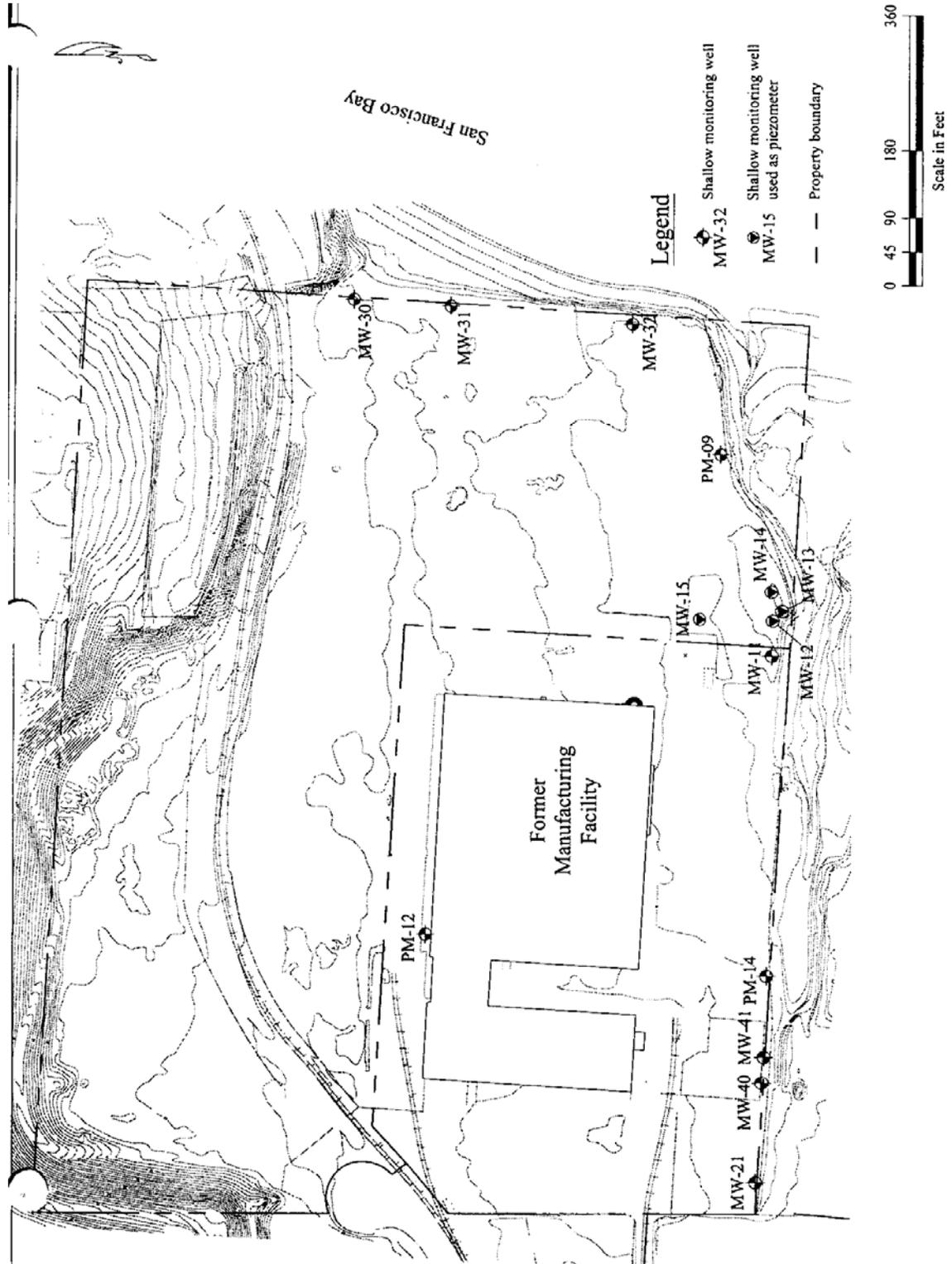
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The Source Group. May 23, 2002. *Soil And Groundwater Sampling Report*

Figure 1: Site Location



Figure 2: Monitoring Well Locations



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Appendix 1 – Statement of Basis, U.S. EPA July 1999