

## CALIFORNIA COASTAL COMMISSION

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W15a



Date Filed:	February 26, 1996
49th Day:	April 15, 1996
Staff:	DR/SF
Staff Report:	March 1, 1996
Hearing Date:	March 13, 1996
Item No.:	15a
Commission Action:	
Commission Vote:	

**STAFF RECOMMENDATION**

**APPLICATION NO.:** E-96-4

**APPLICANT:** Unocal Corporation

**AGENT:** John P. Truschel  
Groundwater Technology, Inc.

**PROJECT LOCATION:** South of intersection and bridge at Front Street and Avila Road, adjacent to San Luis Creek, Avila Beach, San Luis Obispo County. (Exhibits 1 and 2).

**PROJECT DESCRIPTION:** Installation and operation of three groundwater monitoring wells, of permanent construction, to determine the effectiveness of the Phase I West Plume Excavation and Remediation project authorized under Emergency Coastal Development Permit E-95-16-G. Two monitoring wells are proposed on the sandy beach area and a third monitoring well is proposed adjacent to an on-street parking area along Front Street (Exhibits 2, 3, & 4).

**OTHER APPROVALS:**

- San Luis Obispo County Engineering Department, Encroachment Permit 92-99, amended February 27, 1996.
- Port San Luis Harbor District Use License, February 27, 1996.
- Emergency Permit No. E-95-16-G, issued by the Executive Director on November 13, 1995.

**SUBSTANTIVE FILE DOCUMENTS:** See Appendix A

## SYNOPSIS

On November 13, 1995, the Executive Director of the Commission issued Emergency Coastal Development Permit E-95-16-G to Unocal for excavation and remediation of soil and groundwater in the West Plume area of Avila State Beach, San Luis Obispo County. Emergency Permit E-95-16-G was issued in response to the California Regional Water Quality Control Board, Central Coast Region's (RWQCB) Cleanup or Abatement Order No. 95-89 to prevent an "imminent threat" of release into marine waters of illegally discharged crude oil, diesel and gasoline. The underground contamination discharges were reportedly caused by historic leaks from Unocal's pipelines.

Emergency Permit E-95-16-G authorized 1) the installation of a temporary sheetpile cofferdam, 2) excavation of hydrocarbon contaminated sand and removal of contaminated liquid product, 3) installation of temporary High Density Polyethylene (HDPE) containment wall, 4) stabilization of the beach site to its natural state, and 5) other project-related operations, all as specifically described in the Avila Beach Phase I Beach Excavation and Remediation Work Plan (Cannon Associates, October 20, 1995 [as revised on November 1, 1995 and November 6, 1995]).

On January 30, 1996, the RWQCB issued, pursuant to Section 13267 of the California Water Code, a work order to install three groundwater monitoring wells, of permanent construction, to evaluate the effectiveness of the of the HDPE barrier authorized under E-95-16-G. The wells are to be located at either end (beach side) and midway between the ends (Front Street side) of the sheetpile/ HDPE barrier (Exhibit 2).

The Monitoring Well project is located in the West Plume area, south of the intersection and bridge at Front Street and Avila Road, adjacent to San Luis Creek, Avila State Beach, San Luis Obispo County. Avila State Beach, is a public recreational facility operated and maintained by the Port San Luis Harbor District. The Port San Luis Harbor District Board of Commissioners have issued a conceptual approval and a Use License to Unocal for the construction and operation of the groundwater monitoring well project.

The potential coastal resource impacts resulting from construction and operation of the monitoring well project include impacts to the marine environment, archaeological resources, air quality, recreation opportunities, public access and visual resources. An issue summary of potential project-related impacts is contained in Table 1. Potential project-related impacts are partially mitigated by Special Conditions contained in Section 3 on this report. The monitoring well project, as conditioned, is not expected to result in significant impacts to coastal resources.

The staff recommends approval of Unocal's Groundwater Monitoring Well Project.

**Table 1. Issue Summary: Potential Project-Related Impacts**

<b>Potential Impact</b>	<b>Analysis</b>
<b>Marine Environment</b>	<p>Implementation of the monitoring well project will not cause significant adverse impacts to marine resources. All project related work will occur above the mean high tide line in areas where no unique, rare or endangered species are present. The proposed project is designed to monitor the presence of post excavation/remediation hydrocarbon contamination within the soil and groundwater in the West Plume area. Construction and operation of the monitoring wells will assure quantitative evaluation of the effectiveness of remediation activities authorized under Emergency CDP E-95-16-G.</p> <p>Thus, adverse impacts to marine resources of the coastal zone are not expected as a result of construction and operation of the monitoring well project.</p>
<b>Archaeological Resources</b>	<p>An archaeological monitoring report was prepared by Gibson's Archaeological Consulting for the project site. Archaeological field work was conducted between November 14, 1995 and December 14, 1995; supplemental field work was conducted on January 8, 1996. Based on the archaeological field monitoring, no significant historic, prehistoric or paleontological resources are present at the project site.</p> <p>Thus, activities associated with the monitoring well project are not expected to result in significant impacts to archaeological resources.</p>
<b>Air Quality</b>	<p>The San Luis Obispo County Air Pollution Control District (APCD) has reviewed Unocal's monitoring well project proposal. The APCD has determined that the monitoring well project will not result in significant increased air emissions. Air quality permits will not be required for the wells and ancillary equipment. The APCD will continue to monitor project equipment and emissions that may require air quality permits.</p> <p>Thus, adverse impacts to air quality are not expected as a result of construction and operation of the monitoring well project.</p>
<b>Recreation and Public Access</b>	<p>Significant underground petroleum hydrocarbon contamination currently exist at Avila Beach. As such, there is a need to insure that coastal resources including public access and recreation opportunities are protected from the release of these contaminants onto the beach area or into marine environment. The monitoring well program is intended to prevent another declaration of "imminent threat" to public health and safety and to the marine environment by providing the necessary data to ensure proper remediation efforts are employed. Special Conditions have been included in Section 3 of this Report to reduce impacts to public access and recreation opportunities.</p> <p>Thus, the monitoring well project is not expected to result in significant impacts to coastal access and public recreational opportunities.</p>
<b>Visual Resources</b>	<p>Avila State Beach is developed with a variety of facilities including fire pits, playground equipment and volleyball standards. The well head casings for the two monitoring wells located on the sandy beach will add to the semi-developed setting of the beach. The 4 inch diameter well head casings will protrude 3-5 feet above the sand and will be marked with safety striping.</p> <p>The monitoring well project is not proposed in a highly scenic area, as designated in the California Coastline Preservation and Recreation Plan, nor will the project significantly impact views to and along the ocean. Once project construction is complete, the well head casings will be subordinate to the character of the semi-developed beach setting. Special Condition No. 3 limits the permit term to three years and requires Unocal to remove the wells and restore the site to pre-project conditions.</p> <p>Thus, the monitoring well project, as conditioned, is not expected to result in significant impacts to visual resources.</p>

## **1.0 STAFF RECOMMENDATION**

The staff recommends that the Commission adopt the following resolution for Unocal's groundwater monitoring well project, Coastal Development Permit Application E-96-4:

### **APPROVAL WITH CONDITIONS**

The Commission hereby grants a permit, subject to the conditions below, for the proposed development on the grounds that the development, as conditioned, will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program (LCP) conforming with the provisions of Chapter 3 of the Coastal Act, and as conditioned will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

## **2.0 STANDARD CONDITIONS**      See Appendix B.

## **3.0 SPECIAL CONDITIONS**

This permit is granted subject to the following special conditions:

1. Unocal shall submit quarterly monitoring reports to the Executive Director by the twentieth day after the end of the quarter.
2. Unocal shall provide a "safety striping" finish on the well head casing acceptable to the Port San Luis Harbor District. Unocal shall submit written proof of Harbor District approval of the "safety striping" design prior to the issuance of the coastal development permit.
3. Upon completion of the soil and groundwater monitoring program required in the Regional Water Quality Control Board's January 30, 1996 work order, Unocal shall remove the wells and restore the site to pre-project conditions. The term of the permit shall be limited to three years from the date of project approval, with a possible extension of a maximum of two additional years, subject to the review and approval of the Executive Director.
4. In addition to any immunities provided for by law, in exercising this permit, Unocal agrees to hold harmless and indemnify the California Coastal Commission, its officers, employees, agents, successors and assigns from any claims, demands, costs, expenses and liabilities for any damage to public or private property or personnel injury that may result directly or indirectly from the project.

## **4.0 FINDINGS AND DECLARATIONS**

The Commission finds and declares as follows:

#### **4.1 Background**

Petroleum hydrocarbon storage and transfer activities have been conducted in the Avila Beach community since 1910. Gasoline, diesel, gas oil and crude oil are pumped between Unocal's bluff top tank farm and the Unocal pier through a network of underground pipelines that run beneath Front Street and Avila Beach Drive in the community of Avila Beach (Exhibit 1).

In 1990, after the discovery of petroleum hydrocarbon contamination in soil and groundwater during a routine geotechnical survey for a commercial building permit, Unocal conducted a subsurface investigation and found petroleum contamination underlying five square blocks of Avila Beach. The petroleum hydrocarbon contamination was reportedly caused by historic leaks from Unocal's pipelines. Traces of hydrocarbons were found in soils ranging from 6.5 feet to 22.5 feet below the surface. The Western portion of this petroleum hydrocarbon contamination plume lies within the Commission's retained permit jurisdiction, while the eastern portion lies within the County of San Luis Obispo's permit jurisdiction under its certified Local Coastal Program (LCP) (also within the Commission's appeal jurisdiction).

The underground petroleum hydrocarbon contamination area was originally thought to have formed two distinct plumes; a smaller plume which underlies the western portion of the beach, a portion of Front Street and some undeveloped properties (West Plume) and a larger plume which underlies numerous improved properties and roadways (Main Plume). The hydrocarbon contamination was subsequently discovered to form a single plume.

On October 19, 1995, the California Regional Water Quality Control Board, Central Coast Region (RWQCB) issued Cleanup or Abatement (CAO) Order No. 95-89. CAO No. 95-89 was issued to prevent an imminent release into marine waters of crude oil, diesel and gasoline from the "west plume" area.

On November 13, 1995, the Executive Director issued Emergency Coastal Development Permit E-95-16-G to Unocal for excavation and remediation of soil and groundwater on the sandy beach area in the community of Avila Beach, San Luis Obispo County. Emergency Permit E-95-16-G authorized 1) the installation of a temporary sheetpile cofferdam, 2) excavation of hydrocarbon contaminated sand and removal of contaminated liquid product, 3) installation of a temporary High Density Polyethylene (HDPE) containment wall, 4) stabilization of the beach site to its natural state, and 5) other project-related operations, all as specifically described in the Avila Beach Phase I Beach Excavation and Remediation Work Plan (Cannon Associates, October 20, 1995 [as revised on November 1, 1995 and November 6, 1995]).

On January 30, 1996, the RWQCB issued a work order to Unocal for the installation of three groundwater monitoring wells, of permanent construction, to evaluate the effectiveness of the of the HDPE barrier authorized under E-95-16-G, pursuant to Section 13267 of the California Water Code. The wells are to be located at either end (beach side) and midway between the ends (Front Street side) of the sheetpile/ HDPE barrier (Exhibit B).

## **4.2 Project Description**

Unocal proposes to conduct a soil and groundwater monitoring program to gather the data necessary to evaluate the effectiveness of soil and groundwater remediation efforts authorized under Emergency Coastal Development Permit E-95-16-G.

Pursuant to Section 13267 of the California Water Code, the RWQCB has directed Unocal to install three groundwater monitoring wells, of permanent construction, at the Avila Beach West Plume site. The wells are to be located at either end (beach side) and midway between the ends (Front Street side) of the sheetpile/ High Density Polyethylene (HDPE) barrier (Exhibit 2, 3 & 4). The four inch diameter wells shall be screened from two feet above mean sea level (MSL) to ten feet below MSL. Continuous coring will be conducted at one foot intervals through the whole length of the boring (street well only). Soil and groundwater samples will be analyzed as described in the following paragraph.

Groundwater samples will be collected and analyzed from these wells on a quarterly basis. Prior to sampling, groundwater elevations will be recorded and then the wells will be purged. Samples collected will be analyzed for: total petroleum hydrocarbons using EPA method 8015 California Modified (or equivalent) and results compared to gasoline, diesel and crude oil standards. Benzene, ethylbenzene, toluene and xylene using EPA Method 8020; and polynuclear aromatic hydrocarbons using EPA Method 8100. Quarterly monitoring reports will be submitted to the Regional Water Quality Control Board and to the executive director of the Commission within 20 days of the end of the quarter (April, July, October and January) following the month of sample collection.

A hollow stem auger rig with a ten inch auger will be used to install the wells. The drilling rig, a little larger than a pickup truck, will have all terrain capability and will access the site through a maintenance right-of-way. The monitoring well project construction is expected to take one day to complete and will be implemented in early April 1996.

The wells located on the beach will be drilled to a depth of 15 feet. Schedule 40 PVC pipe will be used for casing and screen (screen slot size = 0.020"). The casing interval is from roughly 3 feet above the surface to approximately 3 feet below grade, and the screen interval from approximately 3 feet below grade to 15 feet below grade. A coarse-grain sand pack will fill the annulus from 2 feet to 15 feet. A 1 foot bentonite seal will be placed above the sand, followed by cement grout to the surface. The well head casing will protrude 3 -5 feet above the surface of the sand, be anchored by a concrete foundation (2 feet square on each side) and have a safety striping finish. The top six inches of the concrete foundation and 3-5 feet of the well head casing will normally be exposed above the surface of the sand (Exhibit 3).

The well located on the street will be drilled to a depth of 21 feet. Schedule 40 PVC will be used for the casing and screen (screen slot size = 0.020"). The casing interval is roughly from 0 to 9 feet below grade, and the screen interval from approximately 9 feet to 21 feet. A coarse grain sand pack will fill the annulus from 8 feet to 20 feet below grade. A one foot bentonite seal will be placed above the sand, followed by a cement grout from the surface to 7 feet. A traffic rated well box will be used to cover the well. The well box will be installed flush with the existing grade.

#### **4.3 Local Approvals**

On February 27, 1996, the Port San Luis Harbor District Board of Commissioners issued a Use License for the installation and operation of the groundwater monitoring wells. Unocal's Use License is limited to those activities necessary to comply with the Regional Water Quality Control Board's January 30, 1996 Work Order for the monitoring well project.

#### **4.4 Coastal Act Issues**

##### **4.4.1 Marine Resources**

Coastal Act Section 30230 states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in such a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organism adequate for long-term commercial, recreational, scientific, and educational purposes.

Coastal Act Section 30231 states in part:

The biological productivity of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible restored through, among other means, minimizing adverse effects of waste water discharges...

The installation of groundwater monitoring wells will not cause significant adverse impacts to marine resources. All project related work will occur above the mean high tide line in areas where no unique, rare or endangered species are present. The proposed project is designed to monitor the presence of post excavation/remediation hydrocarbon contamination within the soil and groundwater in the West Plume area. Installation of the monitoring wells will thus assure quantitative evaluation of the effectiveness of remediation activities authorized under Emergency Permit E-95-16-G.

The Commission finds that the monitoring well project, as proposed, will help to sustain the biological productivity of coastal waters by providing ongoing field data on the effectiveness of the HDPE containment wall installed under the authorization of Emergency Permit E-95-16-G, and is therefore consistent with Coastal Act Sections 30230 and 30231.

#### **4.4.2 Archaeological Resources**

Coastal Act Section 30244 states:

Section 30244

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

An archaeological monitoring report was prepared by Gibson's Archaeological Consulting for the project site. Archaeological field work was conducted between November 14, 1995 and December 14, 1995; supplemental field work was conducted on January 8, 1996. No Prehistoric cultural materials or paleontological specimens were observed during the preliminary grading, pit excavation or excavation of the seawall.

Based on the archaeological field monitoring, no significant historic, prehistoric or paleontological resources are present at the project site. Thus, the Commission finds that the monitoring well project, as proposed, is consistent with section 30244 of the Coastal Act.

#### **4.4.4 Air Quality**

Coastal Act Section 30253 (3) states:

New development shall be consistent with requirements imposed by the air pollution control district or the State Air Resources Control Board as to each particular development.

The San Luis Obispo County Air Pollution Control District (APCD) has reviewed Unocal's monitoring well project which is intended to evaluate the effectiveness of the emergency excavation and remediation work conducted at the Avila Beach West Plume site. The monitoring well project will not result in significant increased air emissions. Air quality permits will not be required for the wells and ancillary equipment. The APCD will continue to monitor project equipment and emissions that may require air quality permits.

The Commission thus finds that the project, as proposed, is consistent with Section 30253(3) of the Coastal Act.

#### **4.4.5 Public Access and Recreation**

Coastal Act Section 30210 states:

In carrying out the requirements of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.



Avila State Beach is a coastal recreational facility, operated and maintained by the Port San Luis Harbor District. The Port San Luis Harbor District Board of Commissioners have issued a conceptual approval and granted a Use license to Unocal for the monitoring well project

The project is located at the Avila State Beach West Plume area, adjacent to San Luis Creek. Public access to the shoreline and along the coast is available at the site. Coastal access and recreational use of the beach is a major consideration in evaluating the monitoring well project. The project's relative proximity to the coastline and high beach use area increases concerns for public safety associated both with the underground contamination and operation of the monitoring well facilities.

Each well located on the sandy beach will include a 5 to 8 foot well head casing. The well head casing will protrude 3 to 5 feet above the surface, be anchored by a concrete foundation (2 feet square on each side) and have a safety striping approved by the Port San Luis Harbor District. The top six inches of the concrete foundation and 3 - 5 feet of the well head casing will normally be exposed above the sand surface. The well located adjacent to the parking area along Front Street will be level with the street surface. A traffic rated well box will be used to cover the well.

An all-terrain auger rig, approximately the size of an large pickup truck, will be used for well construction. Well construction should be completed within one days time and will occur in early to mid-April. Construction-related public access impacts are not expected to be significant.

The monitoring well project is required by a Regional Water Quality Control Board mandate<sup>1</sup> to evaluate the status of remediation efforts authorized under Emergency Coastal Development Permit E-95-16-G. The monitoring well project will consist of construction and operation of three groundwater monitoring wells. Two of the wells will be placed on the sandy beach; a third well will be placed adjacent to the on-street parking area along Front Street (Exhibit B).

To insure that health and safety concerns for beach users are addressed, Special conditions have been included in Section 3 of this report. Special Condition 2 requires Unocal to include "safety striping" on the well head casing, acceptable to the Port San Luis Harbor District. Special Condition 3 limits the permit term to three years and requires Unocal to remove the wells upon project completion and restore the site to pre-project conditions.

Significant underground petroleum hydrocarbon contamination currently exist at Avila Beach. As such, there is a need to insure that coastal resources including public access and recreation opportunities are protected from the release of these contaminants onto the beach area or into marine environment. The monitoring well program is intended to prevent another declaration of "imminent threat" to public health and safety and to the marine environment by providing the necessary data to ensure proper remediation efforts are employed. Special Conditions have been included in Section 3 of this Report to reduce impacts to public access and recreation opportunities. The Commission thus finds the monitoring well project, as conditioned, is consistent with Coastal Act Section 30210.

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<sup>1</sup> Letter to Mr. Bill Sharrer, Unocal Corporation, from Roger Briggs, Executive Officer, California Regional Water Quality Control Board -- Central Coastal Region, January 30, 1996.

#### **4.4.6 Visual Resources**

Coastal Act Section 30251 states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Avila State Beach is developed with a variety of facilities including fire pits, playground equipment and volleyball standards. The monitoring well project will add to the semi-developed setting of the beach. The monitoring well project is intended to protect public health and safety and the marine environment by providing the necessary data to ensure proper remediation efforts to address the underground petroleum hydrocarbon plume are employed. Well construction should be completed within one days time and will occur in early April, 1996. Construction-related visual resource impacts will be short-term and are not considered significant.

The Unocal monitoring well project includes the construction and operation of three groundwater monitoring wells. Two wells will be constructed on the sandy beach area and a third well will be located adjacent to the on-street parking area along Front Street. The monitoring wells located on the beach area will be visible to beach users and pedestrians along Front street. The monitoring well adjacent to the on-street parking area along front Street will be constructed at grade with the parking area and will not affect the visual resources (Exhibit 4). Each well located on the sandy beach will include a well head casing. The four inch diameter well head casing will protrude 3 to 5 feet above the surface, be anchored by a concrete foundation (2 feet square on each side) and have a safety striping approved by the Port San Luis Harbor District. The top six inches of the concrete foundation and 3 - 5 feet of the well head casing will normally be exposed above the sand surface (Exhibit 3).

The monitoring well project is not proposed in a highly scenic area, as designated in the California Coastline Preservation and Recreation Plan, nor will the project significantly impact views to and along the ocean. Once project construction is complete, the well head casings will be subordinate to the character of the semi-developed beach setting. Special Condition No. 3 limits the permit term limit to three years and requires Unocal to remove the wells and restore the site to pre-project conditions, upon project completion.

Thus the Commission finds that the monitoring well project, as proposed, is consistent with the visual resource policy contained in Section 30251 of the Coastal Act.

#### **4.4.7 California Environmental Quality Act**

California Public Resources Code. Section 21080.5(d)(2)(i) states:

The rules and regulations adopted by the administering agency shall require that an activity will not be approved or adopted as proposed if there are feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

Thus, CEQA requires the consideration of feasible alternatives and mitigation measures to lessen any environmental impacts of the project to a level of insignificance.

Avila Beach soils and groundwater are contaminated with petroleum products and the West Plume section of the beach that was recently remediated. The Unocal Monitoring Well project is required by the RWQCB to evaluate the effectiveness of the remediation efforts conducted by Unocal authorized by Emergency CDP E-95-16-G.

The "no project" alternative would result in no follow up evaluation of the West Plume remediation efforts. The "no project" alternative would inhibit the assessment and subsequent remediation, if necessary, to prevent the contamination from further encroaching upon land, marine and groundwater resources. Therefore the "no project" alternative is not a less environmentally damaging alternative.

Monitoring wells of temporary construction, as a project alternative, has also been evaluated. However, the installation of temporary monitoring wells would not provide the same data consistency over time as wells with fixed locations. The "temporary monitoring well" alternative would also inhibit the assessment, and subsequent remediation, if necessary, to prevent the contamination from further encroaching upon land, marine and groundwater resources. Therefore, the "temporary monitoring well" alternative is not a less environmentally damaging alternative.

Section 3 of this report contains Special Conditions that are recommended in to mitigate potential impacts associated with project implementation. Special Condition No. 1, requires that Unocal submit quarterly monitoring reports to the executive director. Special Condition 2 requires Unocal to provide a "safety striping" finish on the well head casing. Special Condition 3 limits the permit term and requires Unocal to remove the wells and restore the site to pre-project conditions upon completion of the monitoring program.

The project, as proposed and conditioned, meets the mitigatory requirements of Section 21080.5(d)(2)(i) of the CEQA. Although the Commission believes that implementation of the monitoring well project has the potential to result in adverse impacts to coastal resources, the Commission finds no feasible less environmentally damaging alternatives or additional feasible mitigation measures that would substantially lessen any significant adverse impact which the activity may have on the environment, other than those identified herein. The Commission thus finds the project is consistent with the provisions of the CEQA.

## **Appendix A**

### **Substantive File Documents**

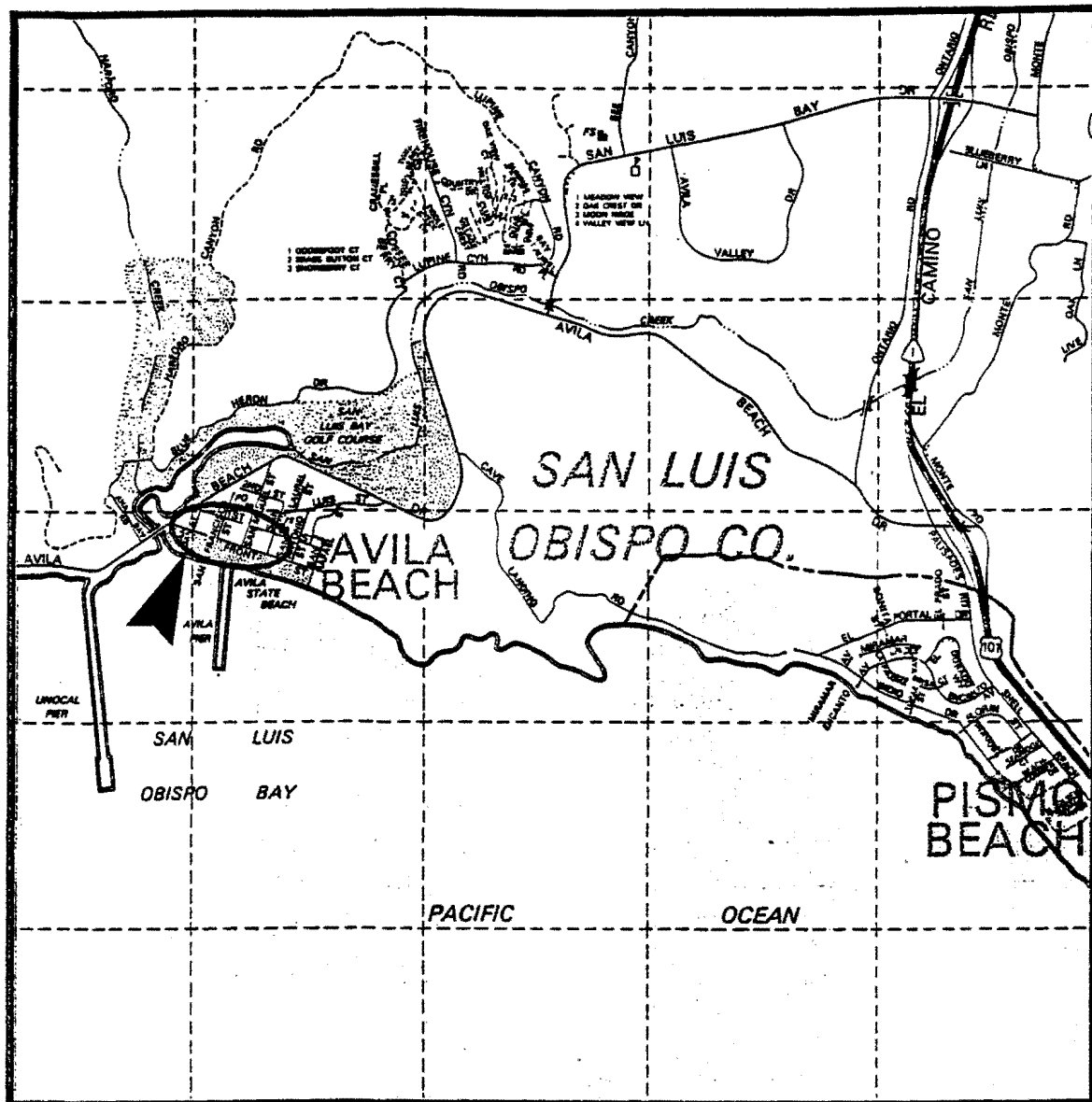
- Letter to Mr. Bill Sharrer, Unocal Corporation, from Roger Briggs, Executive Officer, California Regional Water Quality Control Board -- Central Coast Region, January 30, 1996.
- Letter to Mr. Darryl Rance, Analyst, California Coastal Commission, from Karen L. Brooks, Senior Air Quality Specialist, San Luis Obispo County Air Pollution Control District, February 26, 1996.
- Letter to Mr. Darryl Rance, Analyst, California Coastal Commission, from Jay K. Elder, Harbor Manager, Port San Luis Harbor District, February 21, 1996.
- Letter to Mr. Darryl Rance, Analyst, California Coastal Commission, from Jay K. Elder, Harbor Manager, Port San Luis Harbor District, February 22, 1996.
- Letter to Mr. Darryl Rance, Analyst, California Coastal Commission, from John P. Truschel, Staff Geologist, Groundwater Technology, Inc., February 23, 1996.
- Letter to Unocal Corporation, Permit # 96-MW-051, 052, 053, from Michael J. Doherty, R.E.H.S., Supervising Environmental Health Specialist, San Luis Obispo County Health Agency, February 22, 1996.
- Letter to Mr. Bill Sharrer, Unocal Corporation, Cleanup or Abatement Order No. 95-89, from Roger Briggs, Executive Officer, California Regional Water Quality Control Board -- Central Coast Region, October 19, 1995.
- Emergency Coastal Development Permit E-95-16-G, issued to Unocal Corporation, November 13, 1995.
- License for Monitoring Wells, issued to Unocal Corporation, from the Port of San Luis Harbor District Board of Commissioners, February 27, 1996.
- San Luis Obispo County Engineering Department, Encroachment Permit 92-99, amended February 27, 1996.

## Appendix B

### Standard Conditions

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If Development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions as set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any question of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.





SOURCE: THOMAS BROS. MAPS.  
SAN LUIS OBISPO  
PAGE 248

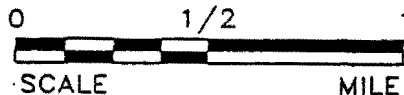


QUAD  
LOCATION



SITE LOCATION

SCALE: 1:31,680



GROUNDWATER  
TECHNOLOGY

## SITE LOCATION MAP

CLIENT:

UNOCAL CORPORATION  
LOS ANGELES, CALIFORNIA

FILE:

1308-SL (1:1)

PROJECT NO.:

02230 000

REV.

LOCATION:

AVILA BEACH, CALIFORNIA

DES.

SC

DET.

JC

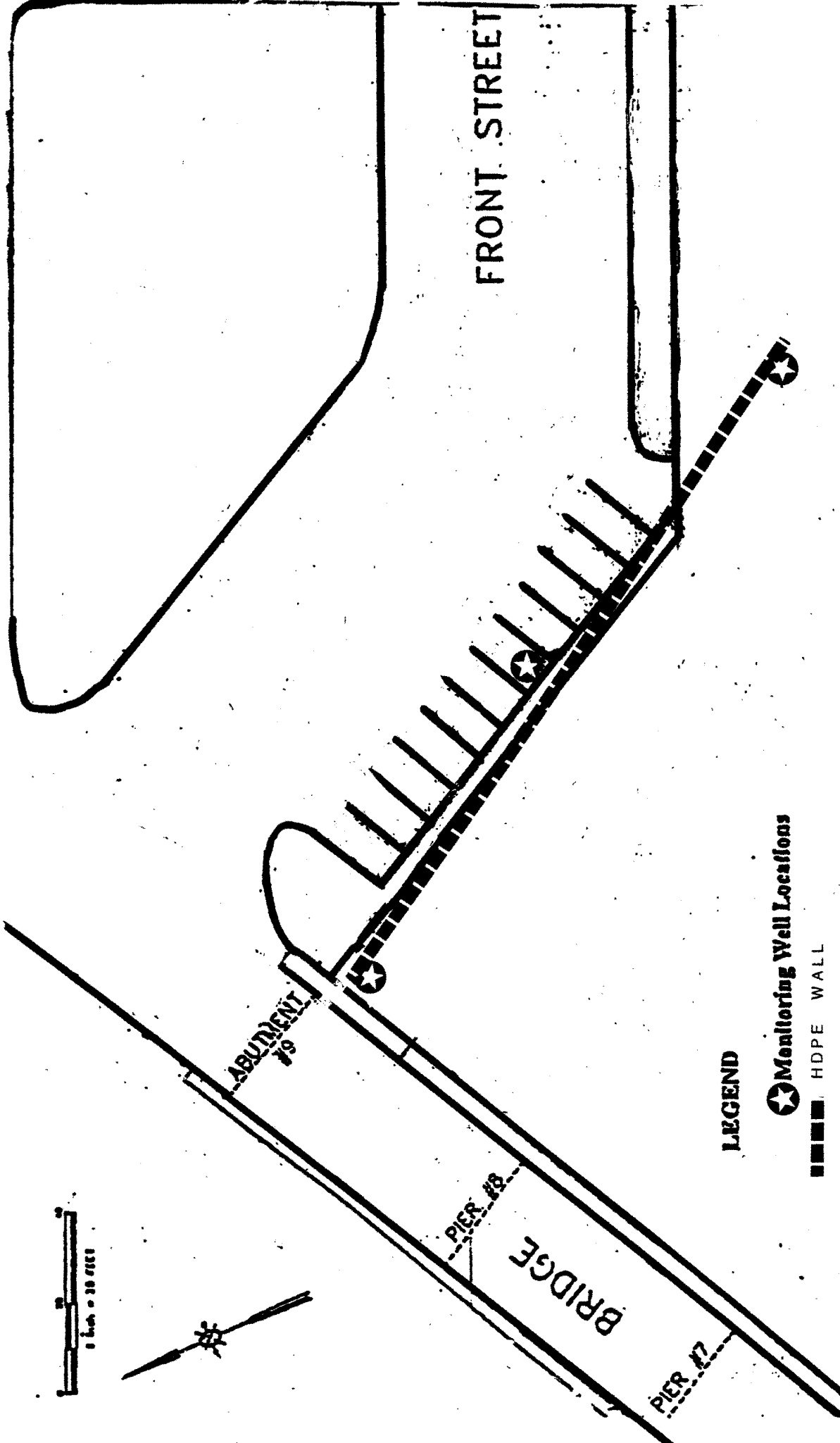
DATE:

11/17/94

EXHIBIT NO. 1

APPLICATION NO.  
E-96-04

Location Map



# Monitoring Well Location Map

Unocal Aylla Beach

January 28 1996

LEGEND  
★ Monitoring Well Locations  
--- HDPE WALL

EXHIBIT NO. 2

APPLICATION NO.  
E-96-04

Monitoring Well  
Location



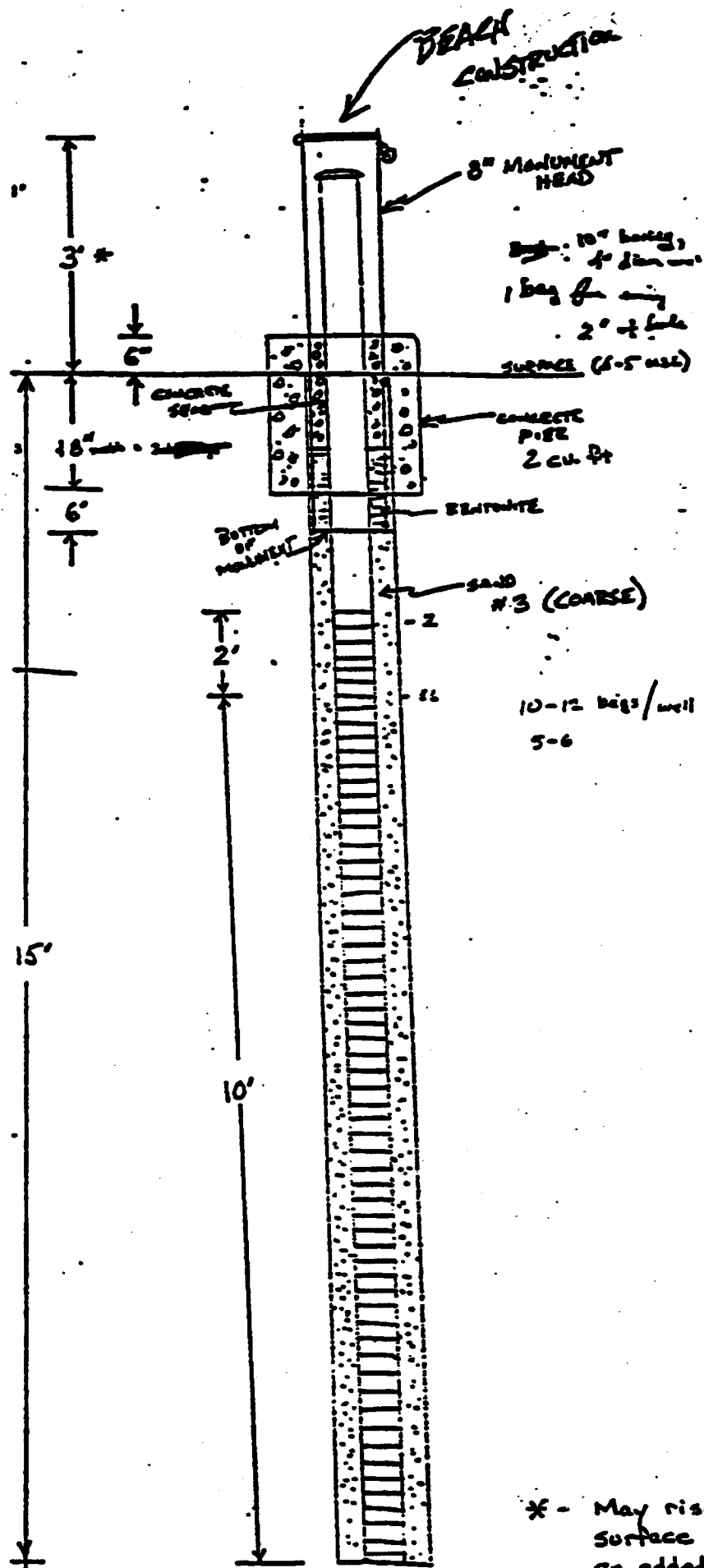



FIGURE 2.

<b>EXHIBIT NO. 3</b>
<b>APPLICATION NO. E-96-04</b>
<b>Beach Well Elevation</b>
 <b>California Coastal Commission</b>

\* - May rise 5 feet above surface instead of 3 feet, as an added safety measure.

STREET  
CONSTRUCTION

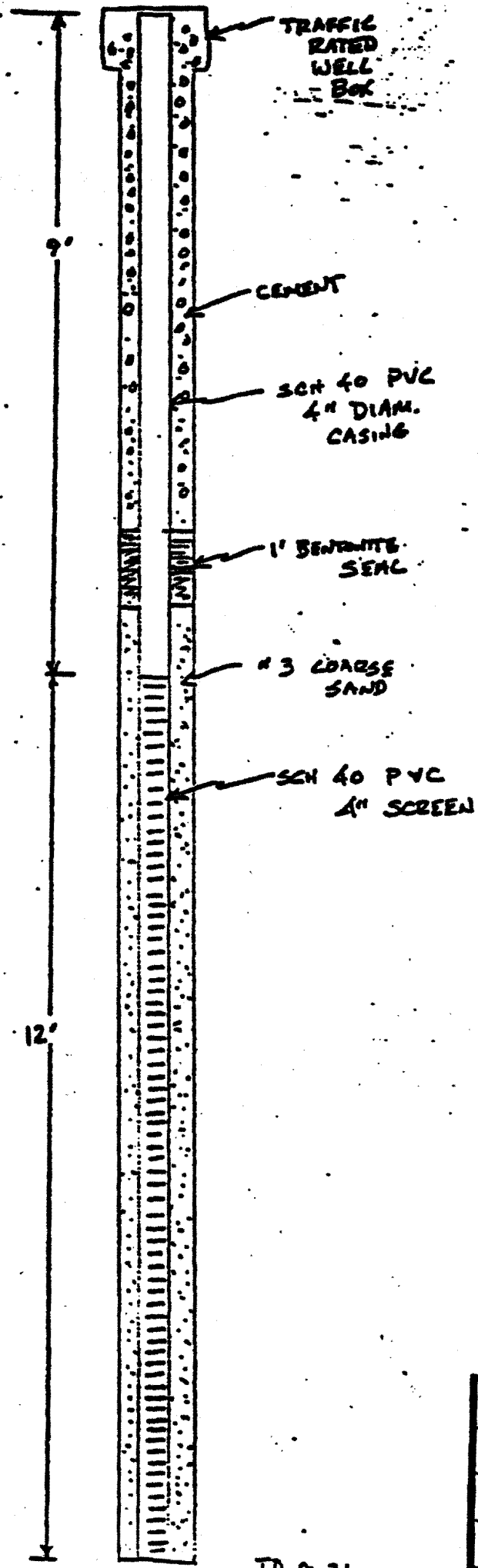



FIGURE 3.

TD 2 21

EXHIBIT NO. 4
APPLICATION NO. E-96-04
Street Well Elevation
 California Coastal Commission