

CALIFORNIA COASTAL COMMISSION

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Tu12a

Filed: April 16, 1996
 49th Day: June 3, 1996
 Staff: DR-SF
 Staff Report: April 19, 1996
 Hearing Date: May 7, 1996
 Item No.: 12a
 Commission Action:
 Commission Vote:

STAFF RECOMMENDATION -- CONSENT CALENDAR

APPLICATION NO.: E-96-15

APPLICANTS: SAN LUIS OBISPO COUNTY PLANNING
 DEPARTMENT

CALIFORNIA REGIONAL WATER QUALITY
 CONTROL BOARD -- CENTRAL COAST REGION

AGENT: Steve Radis, Arthur D. Little and Associates

PROJECT LOCATION: Community of Avila Beach, and Avila State Beach, San Luis
 Obispo County (Exhibits 1 & 2).

PROJECT DESCRIPTION: Installation of ten temporary (4 - 6 weeks) groundwater
 monitoring wells (Exhibits 3 & 4).

SUBSTANTIVE FILE DOCUMENTS: Appendix A

SYNOPSIS

The San Luis Obispo County Planning Department (County) and the California Regional Water Quality Control Board, Central Coast Region (RWQCB), acting as co-lead agencies under the California Environmental Quality Act (CEQA), propose to install 10 temporary groundwater monitoring wells to determine the constituent makeup and areal extent of underground petroleum hydrocarbon contamination at Avila Beach, San Luis Obispo County. Data collected from the groundwater monitoring wells will provide the information necessary to assess the extent of free-phase and dissolved-phase petroleum constituents on and in the groundwater. This site assessment information will be used by the County and the RWQCB for the preparation of an environmental impact report (EIR) for the Unocal Avila Beach Remediation Project.

Extensive petroleum hydrocarbon contamination currently underlies the Community of Avila Beach. 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) (Exhibit 2).

The EIR will evaluate various alternative cleanup technologies and alternative soil and groundwater cleanup levels. Groundwater monitoring wells will be sited along the periphery of the underground contamination plume. Four of the wells will be located on the public beach, south of Front Street. All proposed "beach" wells will be placed as close to Front Street as possible. Six wells will be placed within the County road right-of-ways within the community of Avila Beach.

Table 1 (page 3 of this report) summarizes potential project-related environmental impacts.

Recommended Special Conditions include: (1) submittal to the executive director within 30 days of project completion of a final report on the groundwater monitoring and soil sampling program; (2) a requirement that the well head casing include a "safety striping" finish acceptable to the Port San Luis Harbor District; and (3) a requirement that the wells be removed and the site restored to pre-project conditions within 60 days of issuance of this permit.

The monitoring well project, as conditioned, is not expected to result in significant impacts to coastal resources. The staff recommends approval of the monitoring well project as conditioned.

Table 1 Issue Summary: Potential Project-Related Impacts

Potential Impact	Analysis
Marine Environment	<p>The 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. Thus, adverse impacts to marine resources of the coastal zone are not expected as a result of construction and operation of the monitoring wells.</p>
Archaeological Resources	<p>A cultural resource surface investigation was completed for Front Street and much of the roadway system in the community of Avila Beach in 1992 (Parker and Associates, 1992). Additionally, a cultural resource survey was completed along the seawall and beach areas adjacent to the San Luis Creek and estuary. Neither survey identified the presence of cultural resources within the coastal zone. Ground surface disturbance associated with the monitoring well project will be minimal. The size of the well bore will further reduce potential impacts to cultural resources.</p> <p>Thus, activities associated with the monitoring well project are not expected to result in significant impacts to archaeological resources.</p>
Air Quality	<p>The San Luis Obispo County Air Pollution Control District (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 project.</p>
Recreation and Public Access	<p>Four of the 10 temporary (4 - 6 weeks) monitoring wells will be located on Avila State Beach. Construction activities will be completed in 1 to 2 days. Special Condition No. 2 requires the applicant to provide a "safety striping" finish on the well head casing acceptable to the Harbor District. Special Condition No. 3 requires the applicants to remove the monitoring wells and restore the site to pre-project conditions within 60 days of permit issuance.</p> <p>Thus, the monitoring well project is not expected to result in significant impacts to coastal access and public recreational opportunities.</p>
Visual Resources	<p>Avila State Beach is developed with a variety of facilities including fire pits, playground equipment, volleyball standards and two existing groundwater monitoring wells. The well head casings of four additional monitoring wells located on the sandy beach will add to the semi-developed setting of the beach. The monitoring wells will be placed as close as technically possible to the seawall. The 4-inch diameter well head casings from the four beach wells will protrude 2.5 feet above the sand and will be marked with safety striping. The six wells proposed within the street right-of-ways will be installed at grade with the existing streets.</p> <p>The temporary monitoring wells will not significantly impact views to and along the ocean. Special Condition No. 3 requires that all wells be removed within 60 days of issuance of this permit and the site will be restored 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:

APPROVAL WITH CONDITIONS

The Commission hereby grants a coastal development permit, subject to the conditions below, for the California Regional Water Quality Control Board / San Luis Obispo County Monitoring Well project on the grounds that the project, as conditioned, will be in conformity with the coastal resources policies contained in Chapter 3 of the California Coastal Act, 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 (CEQA).

2.0 STANDARD CONDITIONS See Appendix B.

3.0 SPECIAL CONDITIONS

The California Coastal Commission grants this permit subject to the following conditions:

1. Within 30 days of project completion, the applicants shall submit to the executive director of the Commission (hereinafter "executive director") a final report on the groundwater monitoring and soil sampling program.
2. The applicants shall provide a "safety striping" finish on the well head casing acceptable to the Port San Luis Harbor District. Prior to the issuance of this coastal development permit, the applicants shall submit to the executive director written proof of Harbor District approval of the "safety striping" design.
3. Within 60 days of issuance of this permit, the applicants shall install and remove the wells and restore the site to pre-project conditions. The executive director may for good cause grant an extension of this deadline provided that the applicants submit a written request for an extension that includes reasons for the extension and a revised timeline for project completion.
4. In addition to any immunities provided for by law, in exercising this permit, the applicants agree 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

Unocal operates a marine terminal, tank farm and pump station at Avila Beach. Petroleum hydrocarbon storage and transfer activities have been conducted at Avila Beach since 1910. Gasoline, diesel, and crude oil are pumped between Unocal's bluff top tank farm and the Unocal marine terminal through a network of underground pipelines that run beneath Front Street and Avila Beach Drive.

Petroleum hydrocarbon contamination in Avila Beach's soil and groundwater was discovered in 1989, when a private property owner performed routine soil testing for a commercial construction project. The underground contamination includes, but may not be limited to: 1) crude oil; 2) diesel fuel; and 3) gasoline. Unocal believes that leakage from five or six pipelines (that are now repaired or abandoned) caused the contamination. Since that time, under the direction of the RWQCB, Unocal has been conducting environmental assessment and cleanup activities at Avila Beach. Petroleum hydrocarbons are present in soil and groundwater along and near front street, in the developed town area and under the sandy beach. A 1991 assessment prepared by a Unocal consultant (Groundwater Technology, Inc.) estimates that approximately 15,000 gallons of diesel and 7,000 gallons of gasoline contaminate soil and groundwater within the five square block area of Avila Beach. However, recent site characterization activities suggest that the amount and areal extent of the contamination may be greater than estimated in 1991. Unocal has agreed to fund the independent site assessment and site characterization of the petroleum hydrocarbon contamination as the initial stage of an EIR.

On November 13, 1995, the executive director issued Emergency Coastal Development Permit E-95-16-G to Unocal to excavate and remediate soil and groundwater in the West Plume area of Avila State Beach. The executive director issued Emergency Permit E-95-16-G in response to the RWQCB's Cleanup or Abatement Order (CAO) No. 95-89. CAO 95-89 was issued to prevent an "imminent threat" of release into marine waters of illegally discharged crude oil, diesel and gasoline. 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, and 4) stabilization of the beach site to its natural state. Emergency Permit E-95-16-G only addressed that portion of the soil and groundwater contamination which posed an immediate threat of release if exposed by winter weather conditions.

4.2. Project Description

The San Luis Obispo County Planning Department (County) and the California Regional Water Quality Control Board, Central Coast Region (RWQCB), acting as co-lead agencies under the California Environmental Quality Act (CEQA), propose to install 10 temporary groundwater monitoring wells to determine the constituent makeup and areal extent of underground petroleum hydrocarbon contamination at Avila Beach, San Luis Obispo County. Data collected from the groundwater monitoring wells will be used as baseline information for the preparation of an environmental impact report (EIR) for the Unocal Avila Beach Remediation Project.

Four of the wells are proposed on the sandy beach at Avila State Beach. Six wells are proposed within existing street right-of-ways in the community of Avila Beach. The monitoring wells will be constructed using 2-inch-diameter, Schedule 40, polyvinyl chloride (PVC) pipe (Exhibits 3 & 4). The monitoring wells will be used to gather geologic and chemical information at specific areas of concern in relation to the underground petroleum hydrocarbon contamination plume. The wells will be constructed using a 6.25-inch, inner diameter hollow stem auger mounted on an all-terrain vehicle. All project-related work will occur within existing street right-of-ways or on the sandy beach area where sensitive species and habitat areas will not be disturbed.

Wells located on the beach area will be completed with a 4-inch diameter protective steel casing to approximately 2.5 feet above grade. Wells to be located within the street right-of-ways will be completed with a flush-mounted, traffic-rated vault set into concrete. The groundwater monitoring wells will remain in place for approximately 4 - 6 weeks. This 4 - 6 week time frame will allow the applicants to acquire information needed to assess the extent of free-phase and dissolved-phase petroleum constituents on and in the groundwater.

Waste produced during field activities will include soil cuttings from the drilling operation, ground water from well development and well purging, solvents associated with equipment decontamination, and laboratory wastes. Drilling spoils will be collected on, and covered with plastic to prevent potential cross-contamination of the sandy beach and street right-of-ways. Materials deemed to be potentially hazardous will be shoveled directly into DOT approved 55-gallon steel drums. Project-related fluids will be pumped into DOT approved 55-gallon steel drums. Waste materials generated as a part of this operation will be transferred to Unocal for proper disposal or treatment at an upland facility.

4.3. Local Approvals

On March 27, 1996, the Port San Luis Harbor District Board of Commissioners issued a Use License for the installation and operation of the four groundwater monitoring wells ("beach wells") proposed at Avila State Beach. The Use License is limited to those activities associated with the monitoring well installation and operation.

4.4. Coastal Act Issues

4.4.1. Marine Environment

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 organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

The installation of 10 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 Commission therefore finds the project consistent with Coastal Act Sections 30230.

4.4.2 Recreation and Public Access

Coastal Act Section 30220 states:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Monitoring wells on the beach may affect beach use in the vicinity of the well structures. The four "beach wells" will be placed as close to the seawall as technically possible. The exact location of the "beach wells" will be determined in consultation of the Port San Luis Harbor District to minimize potential beach use conflicts.

Monitoring well construction activities will take 1-2 days to complete. Special Condition No. 2 requires the applicant to provide a "safety striping" finish on the well head casing acceptable to the Harbor District. Special Condition No. 3 requires the applicants to remove the monitoring wells and restore the site to pre-project conditions within 60 days of permit issuance.

Since the project is short-term in duration, it is not expected to result in significant impacts to recreational beach use. Thus, the Commission finds the project, as conditioned, consistent with Coastal Act Section 30220.

4.4.3 Visual Resources

Coastal Act Section 30251 states in part:

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.

Avila State Beach is developed with a variety of facilities including fire pits, playground equipment, volleyball standards and two existing groundwater monitoring wells. Installation of the monitoring wells will not significantly impact views to and along the ocean. Well construction should be completed within one day and will occur in April and May of 1996. Therefore, construction-related visual resource impacts will be short-term and are not considered significant.

The four monitoring wells located on the beach area will be visible to beach users and pedestrians along Front street. The monitoring wells within the street right-of-ways will be constructed at grade

with the street and thus will not be visually intrusive (Exhibit 3). Each well located on the sandy beach will include a well head casing. The 4-inch diameter well head casing will protrude 2.5 feet above the sand surface, and have a safety striping approved by the Port San Luis Harbor District (Exhibit 4).

The monitoring wells will be temporary. Special Condition No. 3 requires the applicants to remove the wells within 60 days of permit issuance and restore the site to pre-project conditions.

Thus, the Commission finds the project, as conditioned, consistent with Coastal Act Section 30251.

4.4.4 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.

A cultural resource surface investigation was completed for Front Street and much of the roadway system in the community of Avila Beach in 1992 (Parker and Associates, 1992) for a previous Unocal pipeline trenching project. No archaeological resources were found during the Parker field investigation. An archaeological monitoring report was also prepared by Gibson's Archaeological Consulting at the west end of Avila Beach for the West Plume Remediation project. Monitoring of this site was recommended due the site's proximity to the mouth of San Luis Creek, and the resulting possibility of encountering resources deposited from upstream locations. 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 grading, pit excavation or excavation of the seawall.

Based on the results of the two previous archaeological investigations it is unlikely that any significant archaeological resources would be encountered during project-related activities. Also, the ground surface disturbance associated with the monitoring well project will be minimal. Each well will be drilled using a 6.25-inch diameter hollow stem auger. The size of the well bore will further reduce the potential for significant impacts to cultural resources.

Additionally, a consultant geologist will be on-site to observe the composition of the materials as the drilling proceeds, and any cultural materials would be noticed immediately. In the unlikely event that cultural resources are encountered during drilling operations, the drilling spoils will be retained and work will stop until a qualified archaeologist can evaluate the materials.

Thus, the Commission finds the project consistent with Coastal Act Section 30244.

4.4.5 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 determined that the monitoring well project will not result in significant increased air emissions. Air quality permits will not be required for the proposed project.

The Commission thus finds the project consistent with Coastal Act Section 30253(3).

4.4.6. California Environmental Quality Act (CEQA)

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.

The “no project” alternative would not allow for the collection of field data necessary to fully and adequately describe the areal extent of, and constituent makeup of the underground petroleum hydrocarbon contamination plume at Avila Beach. The “no project” alternative would inhibit the site assessment and characterization and subsequent soil and groundwater remediation, to prevent the contamination from further impacting upon land, marine and groundwater resources. Therefore the “no project” alternative is not a less environmentally damaging alternative.

The applicants also considered installing monitoring wells for only one day. However, this project alternative would not provide the breadth of data collection as compared to the proposed project. The “1-day” project alternative may not provide enough information to fully characterize the volume and extent of the contamination. Therefore, the “1-day” alternative is not a less environmentally damaging alternative.

Section 3 of this report contains Special Conditions that are recommended to mitigate potential impacts associated with project implementation. Special Condition No. 1 requires the applicants to submit monitoring reports to the executive director within 30 days of project completion. Special Condition 2 requires the applicants to provide a “safety striping” finish on the well head casing. Special Condition 3 requires the applicants to remove the wells and restore the site to pre-project conditions within 60 days of issuance of this permit.

The project, as conditioned, meets the mitigatory requirements of Section 21080.5 (d)(2)(i) of the CEQA. The Commission finds no feasible less environmentally damaging alternatives or additional feasible mitigation measures, other than those identified herein, that would substantially lessen any significant adverse impact which the activity may have on the environment.

Appendix A

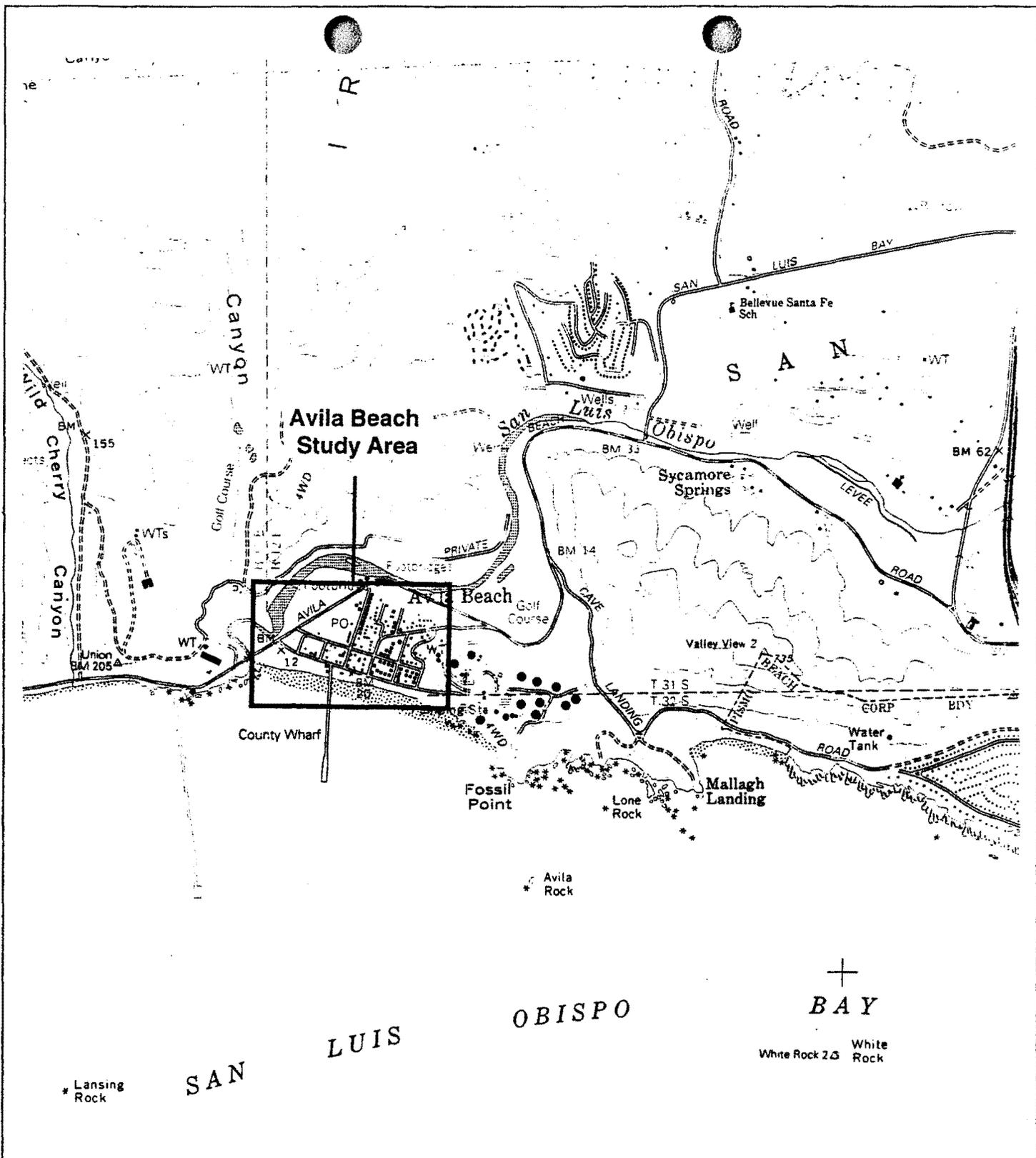
Substantive File Documents

- 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, April 18, 1996.
- Draft Use License For Monitoring Wells, Port San Luis Harbor District, March 27, 1996
- Draft Work Plan -- Assessment of Contamination at Avila Beach, California, Arthur D. Little, March 11, 1996
- Fax Memorandum to Mr. Darryl Rance, Analyst, California Coastal Commission, from David Church, San Luis Obispo County Planning Department, April 15, 1996.
- Fax Memorandum to Mr. Darryl Rance, Analyst, California Coastal Commission, from Steven Mc Masters, San Luis Obispo County Planning Department, Environmental Review Section, April 16, 1996.
- Fax Memorandum to Mr. Darryl Rance, Analyst, California Coastal Commission, from David Church, San Luis Obispo County Planning Department, Energy Section, March 15, 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.

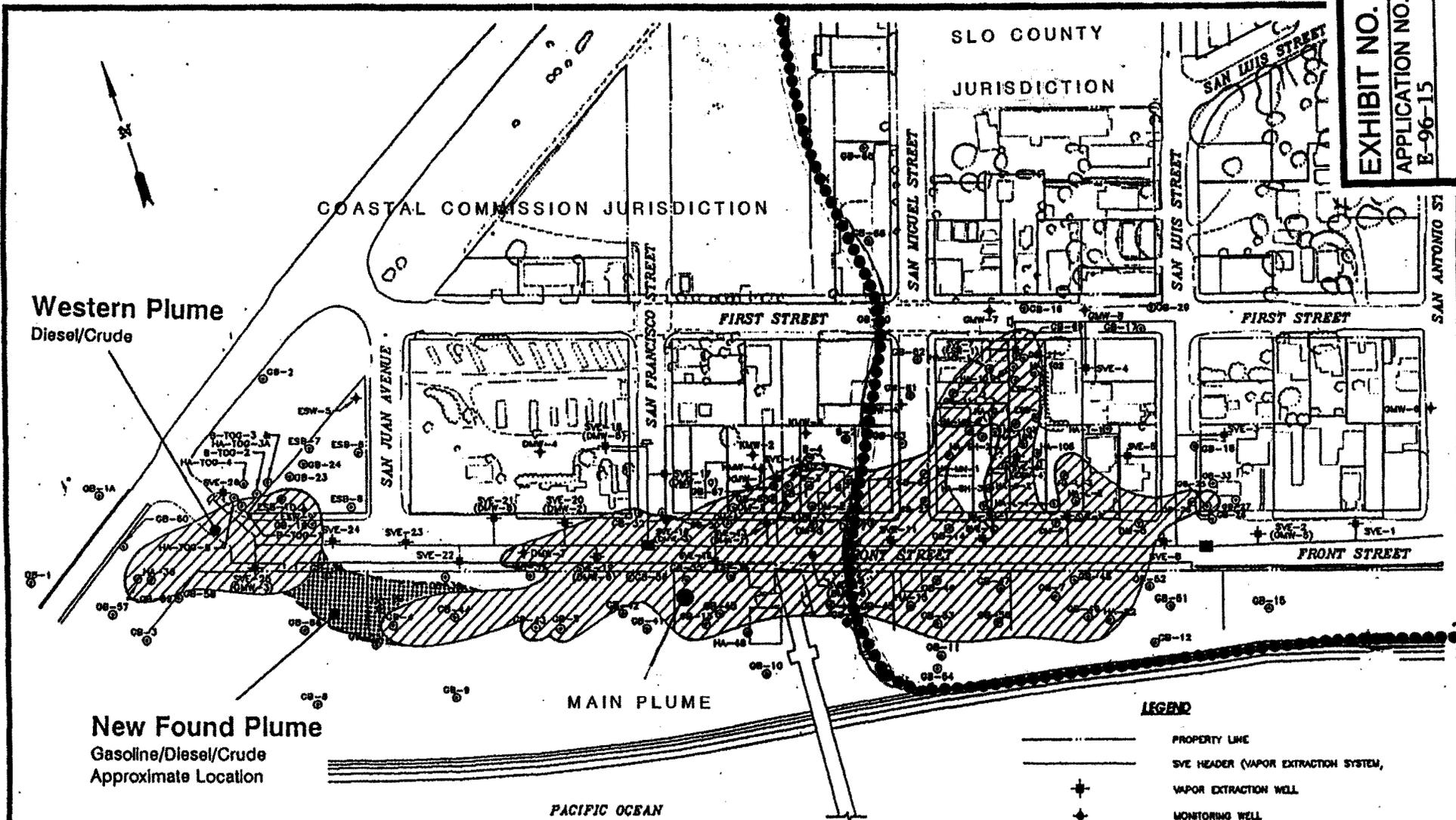


Arthur D Little		TITLE	
		Figure 2-1 Site Location Map	
APPROVALS	DATE	PREPARED FOR Central Coast RWQCB San Luis Obispo County	SCALE
DRAWN			DATE March 1996
CHECKED		SOURCE U.S.G.S., 1994	
QA/CONTROL			
TECH REVIEW			
PROJ MGR			

EXHIBIT NO. 1
APPLICATION NO.
E-96-15
Location Map
 California Coastal Commission



EXHIBIT NO. 2
APPLICATION NO.
E-96-15
Plume Map/
Jurisdiction Map
 California Coastal Commission



Western Plume
 Diesel/Crude

New Found Plume
 Gasoline/Diesel/Crude
 Approximate Location

GENERAL NOTES

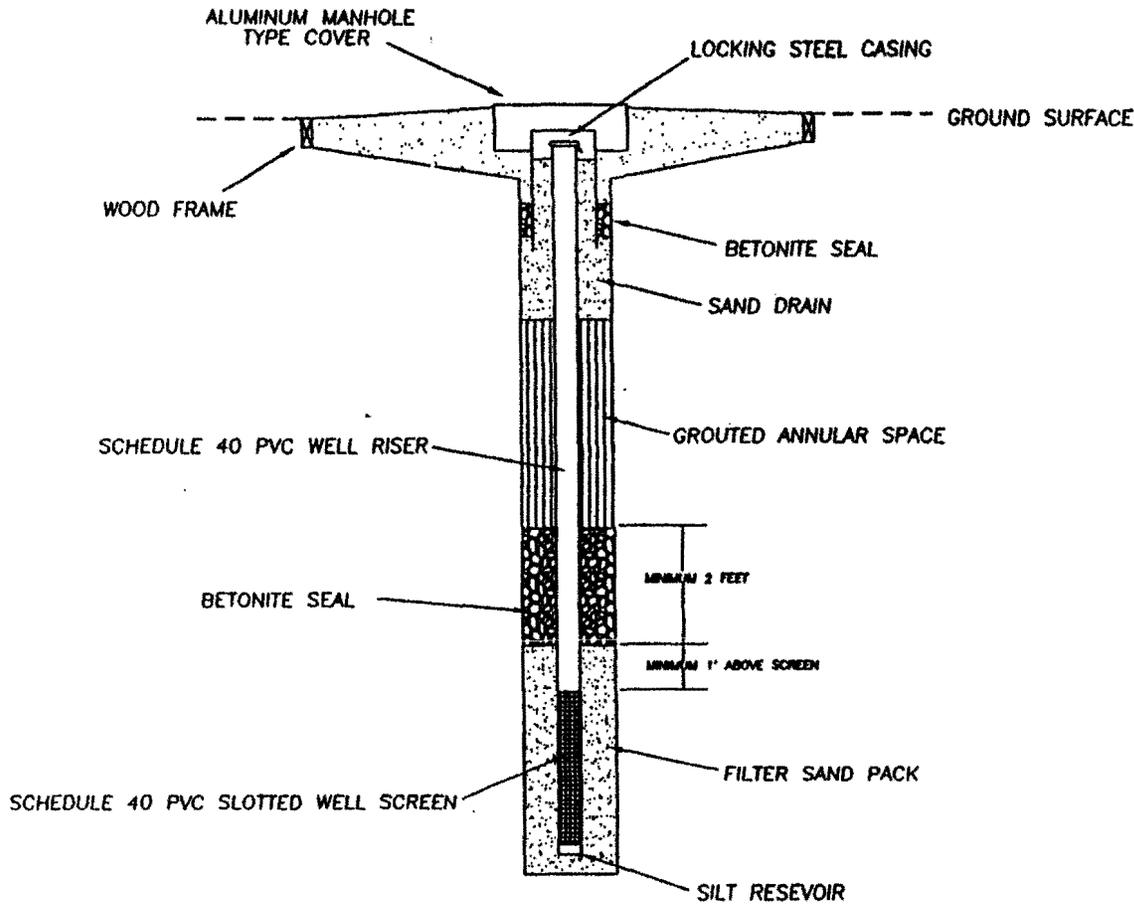
- ALL BUILDING LOCATIONS, SITE FEATURES, AND PROPERTY BOUNDARIES SHOWN ON THIS DRAWING HAVE BEEN PRODUCED FROM INFORMATION PROVIDED BY UNOCAL CORPORATION AND ENGINEERING DEVELOPMENT ASSOCIATES.
- SVE-6 NOT TIED INTO VAPOR EXTRACTION SYSTEM.

LEGEND

- — — — — PROPERTY LINE
- — — — — SVE HEADER (VAPOR EXTRACTION SYSTEM,
- ⊕ VAPOR EXTRACTION WELL
- ⊕ MONITORING WELL
- BORING
- — — — — APPROXIMATE AREAL EXTENT OF HYDROCARBONS
 (GASOLINE >100 ppm, DIESEL >100 ppm,
 CRUDE OIL >1000 ppm)

	0 FEET 200 SCALE	CLIENT: UNOCAL CORPORATION SAN LUIS OBISPO, CALIFORNIA	SITE PLAN SHOWING AREAL EXTENT OF HYDROCARBONS IN SOIL MARCH 1994		
		LOCATION: AVILA BEACH PROJECT	PM:	PE/RG:	FIGURE: 4
FILE: 1308SMA (1:200)	PROJECT NO.: 02230-5512	DES.: SAC	DET.: AJK	DATE: 6/10/94	
REV.:					

CROSS SECTION



LEGEND:

-  CONCRETE GROUT
-  FILTER SAND PACK
-  BETONITE GROUT SLURRY
-  BETONITE PELLETS (HYDRATED)
-  SCHEDULE 40 PVC SLOTTED WELL SCREEN

EXHIBIT NO. 3

APPLICATION NO.
E-96-15

"Street Well"

Arthur D Little

TITLE
FIGURE 2
GROUND WATER MONITORING WELL
STANDARD FLUSH MOUNT SURFACE FINISH

APPROVALS		DATE	PREPARED FOR		SCALE
DRAWN	<i>MSB</i>	<i>12/6/95</i>	ADL, INC.	NOT TO SCALE	
CHECKED	<i>YMC</i>	<i>12/07/95</i>	DATE	DEC. 1995	DWG. NO.
QA/CONTROL	<i>AS</i>	<i>12/07/95</i>	SOURCE	ADL, INC.	FLUSH.DWG
TECH REVIEW	<i>LML</i>	<i>12/06/95</i>	SHEET <u>1</u> OF <u>1</u>		
PROJ MGR					

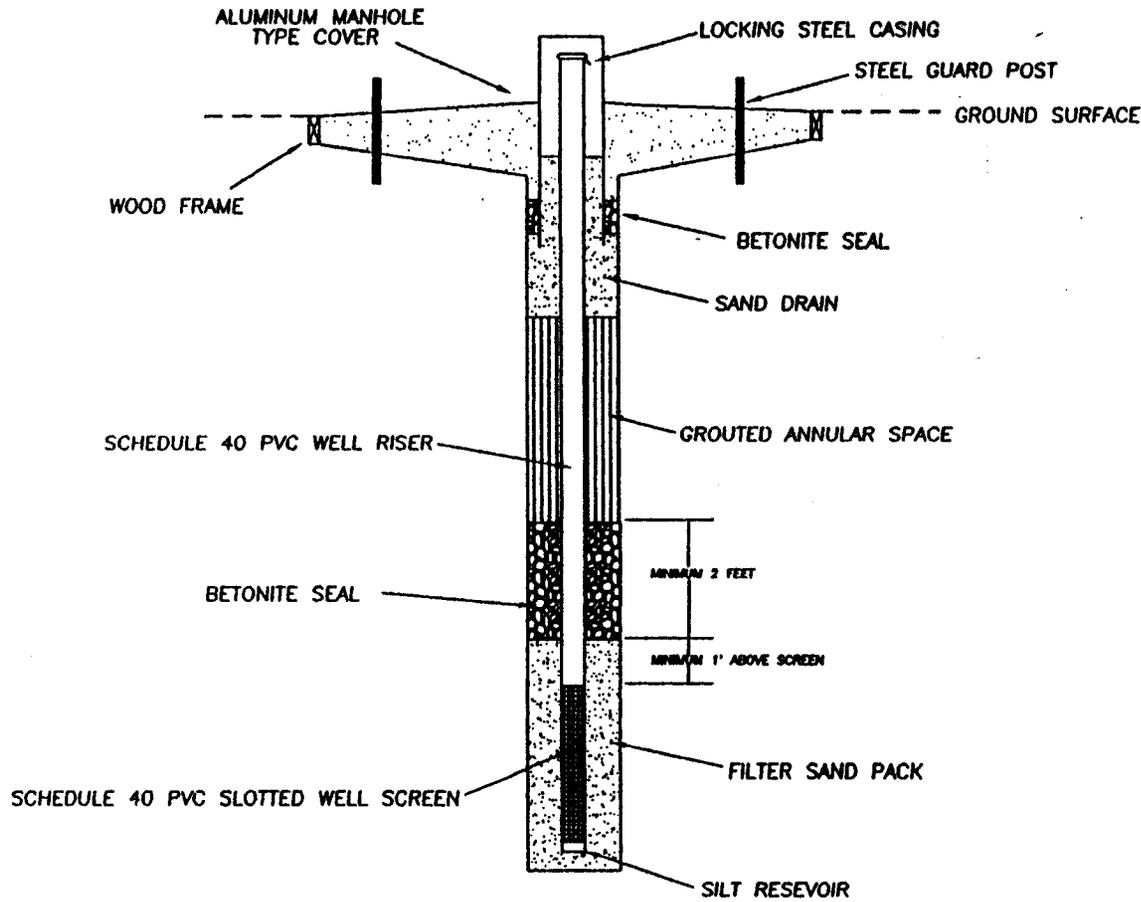
EXHIBIT NO. 4

APPLICATION NO.
E-96-15

"Beach Well"

California Coastal Commission

CROSS SECTION



LEGEND:

-  CONCRETE GR
-  FILTER SAND PACK
-  BETONITE GROUT SLURRY
-  BETONITE PELLETS (HYDRATED)
-  SCHEDULE 40 PVC SLOTTED WELL SCREEN

		TITLE	
		FIGURE 3 GROUND WATER MONITORING WELL STANDARD STAND PIPE SURFACE FINISH	
APPROVALS	DATE	PREPARED FOR	SCALE
DRAWN <i>MSB</i>	12/6/95	ADL, INC.	NOT TO SCALE
CHECKED <i>[Signature]</i>	12/07/95	DATE	DWG. NO.
QA/CONTROL <i>[Signature]</i>	12/07/95	DEC. 1995	STAND.DWG
TECH REVIEW <i>LMK</i>	12/06/95	SOURCE	SHEET 1 OF 1
PROJ MGR		ADL, INC.	