

Peterson Environmental Services
Providing Services In
Environmental Processing
and Hydrogeology

TPM 20777
ER 03-21-006

May 1, 2008

Jim Bennett
County Groundwater Geologist
Department of Planning and Land Use
5201 Ruffin Road Suite B-1
San Diego California 92123-1666

Subject: Water Quality Testing for Uranium and Gross Alpha Garza Minor Subdivision
TM 20777

Dear Mr. Bennett:

Following your direction given in the March 20, 2008 letter (Conners to Garza, Attachment A) water quality samples were taken from the existing domestic well for uranium and gross alpha. The samples were collected following your direction and this is summarized below.

Sampling Procedures Handling and Transportation: All sample containers for all samples were provided from the EnviroMatrix Analytical Lab. This lab is a certified by the California Department of Health Services. Sample containers for gross alpha, and uranium, were clean and unpreserved plastic bottles. All samples were collected by me, maintained within an ice cooler at 4°C and transported directly to the lab within the time limits established. Please note that gross alpha and uranium testing was performed at FGL Laboratory located in Santa Paula California, as a subcontractor to EnvironMatrix Analytical Labs. Chain of custody was directly from me to the lab personnel at EnviroMatrix.

Analytical Methods: Analytical processes employed for the testing are given below:

| <u>Analyte</u> | <u>Analytical Methods</u> | <u>MCL</u> |
|----------------|---------------------------|------------|
| Gross Alpha | 900.0 | 15 pCi/L |
| Uranium | 908.0 | 20 pCi/l |

Groundwater Sampling Collection:

A water sample was collected from the existing domestic well on April 11, 2008. This sample was a pumped sample following 30 minutes of production (Figure 1). Following your direction the well was not purged with two full well bore volumes prior to the collection of the sample. This well is a domestic supply well used to provide domestic water to the existing occupied home. Due to this the water within the well is considered "fresh" since the well is in frequent usage.

Sampling Analysis

Water Quality results are given below.

Water Quality Results

Garza Domestic Well sample date of 4/11/08

Gross Alpha¹ = 2.22 +/- 0.941

Uranium² = 0.810 +/- 0.529

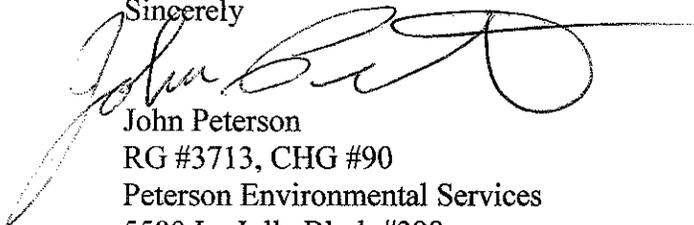
¹ Given in pCi/L and a MCL of 15

² Given in pCi/L and a MCL of 20

In summary the water quality for gross alpha and uranium are well below the maximum contaminant level.

Please contact me if you require any additional information regarding the water sample connection or data results.

Sincerely



John Peterson

RG #3713, CHG #90

Peterson Environmental Services

5580 La Jolla Blvd. #398

La Jolla Ca. 92037

Attachments

Attachment A: Letter Connors to Garza March 20, 2008

Attachment B: Water Quality Results EnviroMatrix

Attachment C: Picture of Production Well

**Attachment A: Letter Connors
To Garza March 20, 2008**

13 pages

GARZA

760-804-5918 (h)

760-688-1736 (w)



County of San Diego

ERIC GIBSON
INTERIM DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

6201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1686
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

March 20, 2008

Michelle Garza
1736 Geranium St
Carlsbad, CA 92009

RE: Garza Minor Subdivision (4 Lots + Rem); TPM 20777; NINTH ITERATION REVIEW OF INITIAL STUDIES/INFORMATION

The Department of Planning and Land Use (DPLU) has completed the review of your Extended Initial Study/Information and determined it to be "incomplete" as defined by the California Environmental Quality Act (CEQA). At this time, additional information or revisions will be required to determine your project's potential impacts on the environment and complete the CEQA Environmental Initial Study. The reason for this determination and the revisions/information required are listed below.

MAJOR PROJECT ISSUE

The following project issue was identified during the project scoping and is further discussed below. This issue may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by DPLU. This issue discussed below, was identified based upon information presently available to the County and is subject to change upon submittal of further information and studies:

OUTSTANDING GROUNDWATER ISSUE

The Campo/Lake Morena region has been documented to have some wells with the highest detections of naturally-occurring radioactive particles in the County. In some cases, detections of gross alpha in groundwater samples collected from wells in Morena village have been 10 times the primary drinking water standard (MCL). Community water systems in Morena Village and Cameron Corners have remediation systems to bring radioactivity into MCL compliance.

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March 20, 2008

Since the site is in the vicinity of a known area of the County to have some wells with detections of naturally occurring radioactive elements above the MCL (which could pose a threat to human health), the well which was used in the aquifer testing performed in 2004 shall be sampled for:

- Gross alpha particles by Standard Method 7110C
- Uranium by EPA Method 908.0/Standard Method 7500-U B

The County recommends that the sampling for radioactive elements be performed as soon as possible. For Radioactive elements found at levels above the MCL (after four quarters of sampling conclusively demonstrates this), a small water system regulated by the County Department of Environmental Health would be necessary to bring radioactive elements into compliance. This may prove to be economically infeasible for a minor subdivision.

Groundwater Sampling Procedures. Water samples should be collected after at least two well bore volumes have been purged from the well. Please follow standard sampling procedures and collect the samples in laboratory certified bottles, place samples in a cooler with ice which must be maintained at a temperature of 4 degrees C, handle in accordance with standard chain-of-custody procedures, and ensure that samples are within laboratory holding times. It should be noted on the chain-of-custody that the samples are for drinking water. Also, please use a California-certified laboratory. **Important: Samples collected by anyone other than a California Professional Geologist (or staff/subcontractors under the direct supervision of the Professional Geologist) will not be accepted by the County as valid samples.**

Letter Report. A letter report must be submitted to the County by a California Professional Geologist who is responsible for all work performed. The report shall document all sampling procedures as outlined above including the dates/times samples were collected, the methodologies used, whether or not the samples met holding times, what bottles were used, and the chain-of-custody procedures. Please also include all laboratory documentation of the results in an appendix.

Please contact Jim Bennett, County Groundwater Geologist, at 858-694-3820 if you have any questions regarding these comments.

For your reference, I have attached is a copy of the County's CEQA Consultant List for Groundwater, which can also be found on the County of San Diego's website at: <http://www.sdcdplu.org/dplu/Resource/docs/3~pdf/consList.pdf>. The California Professional Geologist responsible for all work performed is not required to be listed on the County's CEQA Consultant List.

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March 20, 2008

PROJECT SCHEDULE: An updated copy of your project schedule is attached showing an estimated hearing/decision date of October 2, 2008.

GP2020: Attached is a GP2020 Frequently Asked Questions about Subdivisions document. Also visit the following website address for more information on GP2020: <http://www.sdcounty.ca.gov/cnty/cntydepts/landuse/planning/GP2020/index.html>.

SUBMITTAL REQUIREMENTS: Unless other agreements have been made with County staff, you must comply with the following submittal requirements in order to make adequate progress and to minimize the time and cost in the processing of your application:

1. Submit a copy of this letter.
2. In addition to the documents requested below, electronic versions of these documents / studies can be e-mailed directly to the Project Manager at Michelle.Conners@sdcounty.ca.gov. This will enable staff to make editorial strikeout/underline changes to electronic documents, ultimately saving time in the process.
6. The following information and/or document(s) with the requested number of copies as specified. **The Project Number and Environmental Log Number must be clearly and visibly labeled on all submitted documents. All changes to the document(s) must be in strikeout/underline format.**

| INFORMATION/DOCUMENT | NO. OF COPIES | LEAD REVIEW DEPT./SECTION |
|--|---------------|---------------------------------|
| Letter Report (Groundwater Sampling) | 3 | M. Conners (1), Jim Bennett (2) |
| The staff turnaround goal for review of the requested information/document is 21 days. | | |

*Please contact me in advance for a Special Handling Form if you wish to submit other documents supporting the Replacement Tentative Map revisions.

RESUBMITTAL DUE DATE: In order to maintain adequate progress and be consistent with the Estimated Processing Schedule (attached), DPLU recommends that all of the revisions/information requested in this letter be submitted by **April 21, 2008**. If you are unable to submit the requested revisions/information by the above date, please contact your DPLU Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension. Be aware if the submittal is deemed to be excessively late (generally six or more months), notifications are not received, or your project is excessively behind schedule

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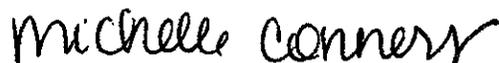
March 20, 2008

the Department may make a recommendation for denial of your project to the appropriate decision-making authority based upon inadequate progress pursuant to CEQA Guidelines Section 15109.

PROJECT ISSUE RESOLUTION PROCESS: If you have disagreements with the requirements within this letter you may, after trying to resolve issues with project staff, have these issues referred to the Project Issue Resolution process to provide you with an opportunity to quickly and inexpensively have issues considered by senior County management. Issues considered under this procedure can include disagreements with staff interpretations of codes or ordinances, requests for additional information or studies, or disagreements regarding project related processing requirements. This process does not replace any other appeal mechanisms such as those for CEQA determinations or administrative appeals. Please contact me to learn more about this process, the limitations, or to request an application form.

If you have any questions or need additional information, please contact me at (858) 694-2636 at Michelle.Conners@sdcounty.ca.gov.

Sincerely,



Michelle Connors, Project Manager
Regulatory Planning Division

RG:MC:lm

Attachments:

Revised Estimated Project Schedule
GP2020 Frequently Asked Questions About Subdivisions
Consultant List

cc: Larry Walsh, Walsh Engineering, 1870 Cordell Court, Ste 102, El Cajon, CA 92020
Edwin M. Sinsay, Project Manager, Department of Public Works, M.S. 0336
Richard Grunow, Planning Manager, Department of Planning and Land Use, M.S. 0650

Attachment B: Water Quality Results
EnviroMatrix



30 April 2008

Peterson Environmental Services
Attn: John Peterson
5580 La Jolla Blvd, Suite 398
La Jolla, CA 92037

EMA Log #: 0804230

Project Name: Garza

Enclosed with this letter are the test results performed by subcontract laboratory for the following analyses:

- Uranium
- Gross Alpha

The samples were received by EnviroMatrix Analytical, Inc. intact and with chain-of-custody documentation. The test results and pertinent quality assurance/quality control data are listed on the attached tables.

I certify that this data report is in compliance both technically and for completeness. Release of the data contained in this hard copy data report has been authorized by the following signature.

Dan Verdon
Laboratory Director



ANALYTICAL CHEMISTS

April 29, 2008

Lab ID : SP 804070
Customer : 2019971

Enviro Matrix Analytical, Inc.
4340 Viewridge Avenue
Suite A
San Diego, CA 92123

Laboratory Report

Introduction: This report package contains total of 4 pages divided into three sections:

- Case Narrative (2 Pages): An overview of the work performed at FGL.
Chemical Results (1 Page): Results for each sample submitted.
Quality Control (1 Page): Supporting Quality Control (QC) results.

This report package pertains to the following sample:

Table with 5 columns: Sample Description, Date Sampled, Date Received, FGL Lab Sample ID #, Matrix. Row 1: Garza, 04/11/2008, 04/15/2008, SP 804070-01, DW

Sampling and Receipt Information: The sample was received, prepared and analyzed within the method specified holding times. All samples arrived at 4 °C. All samples were checked for pH if acid or base preservation required (except for VOAs). For details of sample receipt information, please see the attached Chain of Custody and Condition Upon Receipt Forms.

Quality Control: All samples were prepared and analyzed according to the following tables:

Radio Chemistry QC

Table with 2 columns: Sample ID, Description. Rows include 900.0 (04/16/2008:A207, 04/21/2008:A - GP213) and 908.0 (04/21/2008:A218, 04/23/2008:A - GP216).

Case narrative continued on next page...

April 29, 2008

Lab ID : SP 804070
Customer : 2019971

Enviro Matrix Analytical, Inc.

Certification: I certify that this data package is in compliance with NELAC Standards, both technically and for completeness, except for any conditions listed above. Release of the data contained in this data package is authorized by the Laboratory Director or his designee, as verified by the following signature.

FGL ENVIRONMENTAL



KAD:cea

Kelly A. Dunnahoo, B.S.
Laboratory Director



ANALYTICAL CHEMISTS

April 29, 2008

Enviro Matrix Analytical, Inc.
4340 Viewridge Avenue
Suite A
San Diego, CA 92123

Description : Garza
Project : 0804230

Lab ID : SP 804070-01
Customer ID: 2-19971

Sampled On : April 11, 2008-09:00
Sampled By : Not Available
Received On : April 15, 2008-14:30
Matrix : Drinking Water

Sample Results - Radio

Table with 7 columns: Constituents, Result ± Error, MDA, Units, MCL, Preparation Method Date/ID, Analysis Method Date/ID. Rows include Radio Chemistry P:1, Gross Alpha, and Uranium.

MDA = Minimum Detectable Activity; Data utilized by the DHS to determine matrix interference. MCL = Maximum Contaminat Level.
Containers: (P) Plastic Preservatives: (1) Cool 4°C

* Including Radium but excluding Uranium. (Ref. Title 22 sec. 64442.)

CCR Section 64442: Compliance Note: If Gross Alpha (Result + (0.84 x error)) exceeds 5 pCi/L run Uranium. If Gross Alpha minus Uranium exceeds 5 pCi/L run Radium 226. Samples that exceed 5 pCi/L are held for 6 months at FGL.

Compliance:

- Gross Alpha - Uranium ≤ 15 pCi/L
Uranium ≤ 20 pCi/L
Radium 226 + Radium 228 ≤ 5 pCi/L



ANALYTICAL CHEMISTS
 April 29, 2008
 Enviro Matrix Analytical, Inc.

Lab ID : SP 804070
 Customer : 2-19971

Quality Control - Radio

| Constituent | Method | Date/ID | Type | Units | Conc. | QC Data | DQO | Note |
|-------------|--------|---------------------------------------|------------------------------------|---|-------------------------|---|---|------|
| Gross Alpha | 900.0 | 04/16/2008:A207 (STK833742-01) | Blank LCS MSD MSRPD | pCi/L pCi/L pCi/L pCi/L | 146.5 146.5 146.5 | ND 75.1% 62.5% 64.9% 3.7% | <1 75-125 60-140 60-140 ≤30 | |
| Alpha-α | 900.0 | 04/21/2008:A | 00-CCB 00-CCV | cpm cpm | 19760 | 0.10 46.2% | .05 ± .079 41.0 ± 10 | |
| Uranium | 908.0 | 04/21/2008:A218 | RgBlk LRS BS BSD BSRPD | pCi/L pCi/L pCi/L pCi/L pCi/L | 20.27 20.27 20.27 | 0.00 83.4% 89.6% 86.6% 3.3% | 1 46-100 75-125 75-125 ≤20 | |
| Alpha-α | 908.0 | 04/23/2008:A | 00-CCB 00-CCV | cpm cpm | 19760 | 0.10 46.6% | .0647 ± .089 42.0 ± 10 | |

Definitions

- Blank : Method Blank - Prepared to verify that the preparation process is not contributing contamination to the samples.
- RgBlk : Method Reagent Blank - Prepared to correct for any reagent contributions to sample result.
- LCS : Laboratory Control Standard/Sample - Prepared to verify that the preparation process is not affecting analyte recovery.
- LRS : Laboratory Recovery Standard
- MS/MSD : Matrix Spikes - A random sample is spiked with a known amount of analyte. The recoveries are an indication of how that sample matrix affects analyte recovery.
- BS/BSD : Blank Spikes - A blank is spiked with a known amount of analyte. It is prepared to verify that the preparation process is not affecting analyte recovery.
- CCB : Continuing Calibration Blank - Analyzed to verify the instrument baseline is within criteria.
- CCV : Continuing Calibration Verification - Analyzed to verify the instrument calibration is within criteria.
- ND : Non-detect - Result was below the DQO listed for the analyte.
- DQO : Data Quality Objective - This is the criteria against which the quality control data is compared.

SUBCONTRACT ORDER

EnviroMatrix Analytical, Inc.

0804230

804070.

SENDING LABORATORY:

EnviroMatrix Analytical, Inc.
4340 Viewridge Ave., Ste. A
San Diego, CA 92123
Phone: (858) 560-7717
Fax: (858) 560-7763
Project Manager: Jamey A. Cote

RECEIVING LABORATORY:

FGL (Fruit Growers Lab) [S]
853 Corporation Street
Santa Paula, CA 93060
Phone: (805) 392-2000
Fax: (805) 525-4172

Standard T.A.T

| Analysis | Due | Expires | Laboratory ID | Comments |
|-----------------------------|---------------------------|-------------------------|---------------|----------|
| Sample ID: Garza | Water | Sampled: 04/11/08 09:00 | | |
| Uranium | 04/08/08 16:00 | 10/08/08 09:00 | | |
| Gross alpha | 04/08/08 16:00 | 10/08/08 09:00 | | |
| <i>Containers Supplied:</i> | | | | |
| 1L Poly - Unpres (A) | 1L Poly - Unpres (B) | | | |

Please send reports to Jcote @ enviomatrix inc. com and reports @ enviomatrixinc.com

[Signature]
Released By _____ Date *4/14/08*

[Signature]
Received By _____ Date *4/15/08 1430*

[Signature]
Released By _____ Date _____

[Signature]
Received By _____ Date _____
4°C

CHAIN-OF-CUSTODY FORM

EnviroMatrix

Analytical, Inc.

page _____ of _____

EMMA LOG #: 0804730
 Client: Garza
 Attn: John Peterson
 Sampler(s): John Peterson
 Address: 5432 Telford Ave
La Jolla Ca. 92037
 Phone: 619-451-9204
 Email: petersonenv@hdfused.com
 Billing Address:

4340 Viewridge Ave., Ste. A - San Diego, CA 92123 - Phone (619) 560-7717 - Fax (619) 560-7763

Project ID: _____
 Project #: Garza
 PO#: _____
 Client Sample ID: Garza
 Sample Date/Time: 4/11/08
 Sample Matrix: DW
 Container(s) # of / Type: _____

| # | Client Sample ID | Sample Date/Time | Sample Matrix | Container(s) # of / Type |
|----|------------------|------------------|---------------|--------------------------|
| 01 | Garza | 4/11/08 | DW | |
| 02 | | | | |
| 03 | | | | |
| 04 | | | | |
| 05 | | | | |
| 06 | | | | |
| 07 | | | | |
| 08 | | | | |
| 09 | | | | |
| 10 | | | | |

| Sample Matrix Codes: GW=ground water, WW=waste water, DW=drinking water, SW=storm water | DATE/TIME STAMP |
|---|---|
| A=air, SED=sediment, O=oil, T=tissue, S=solid other (specify), L=liquid other (specify) | 4/11/08 16:38 |
| Shipped By: <input type="checkbox"/> Courier <input type="checkbox"/> UPS <input type="checkbox"/> FedEx <input type="checkbox"/> USPS <input type="checkbox"/> Client drop off <input type="checkbox"/> Other | RECEIVED BY: <u>[Signature]</u> |
| Turnaround Time: <input type="checkbox"/> Same day <input type="checkbox"/> 24 hr <input type="checkbox"/> 48 hr <input type="checkbox"/> 3 day <input type="checkbox"/> 5 day <input type="checkbox"/> 7 day <input type="checkbox"/> 10 day | Signature: <u>[Signature]</u> |
| Reporting Requirements: <input type="checkbox"/> Fax <input type="checkbox"/> PDF <input type="checkbox"/> Excel <input type="checkbox"/> Geotracker RDF <input type="checkbox"/> Other | Print: <u>John Peterson</u> |
| Sample Disposal: <input type="checkbox"/> By Laboratory <input type="checkbox"/> Return to client <input type="checkbox"/> P/U or Delivery <input type="checkbox"/> Archive until _____ | Company: <u>EnviroMatrix Analytical, Inc.</u> |
| Correct Containers: Yes No N/A | Signature: _____ |
| Containers Properly Preserved: Yes No N/A | Print: _____ |
| Custody Seals Intact: Yes No N/A | Company: _____ |
| Temperature @ Receipt: _____ | Signature: _____ |
| COC/Labels Agree: Yes No N/A | Print: _____ |
| Sampled By: <input type="checkbox"/> Client <input type="checkbox"/> EMMA <input type="checkbox"/> Autosampler | Company: _____ |
| Project Comments: _____ | Signature: _____ |
| | Print: _____ |
| | Company: _____ |

White - EMA
 Canary - Accounting
 Pink - Client (w/Report)
 Goldened - Client (Relinquish Samples)

*Additional costs may apply, consult a project manager for details.
 *EMMA reserves the right to return any samples that do not match our waste profile.
 Note: By relinquishing samples to EnviroMatrix Analytical, Inc., client agrees to pay for the services requested on this chain of custody form and any additional analyses performed on this project. Payment for services is due within 30 days from the date of the invoice. Sample(s) will be disposed of after 30 days unless otherwise noted. All work is subject to EMMA's terms and conditions.

T-60c on file

**Attachment C: Picture of
Production Well**

