



## Legislation Details (With Text)

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**Title:** CONSIDER STATUS REPORT ON THE REGIONAL WATER QUALITY CONTROL BOARD ENVIRONMENTAL INVESTIGATION AND CARSON DECLARATION OF THE EXISTENCE OF A LOCAL EMERGENCY WITHIN THE CAROUSEL TRACT (CITY COUNCIL)  
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**Attachments:** 1. Exhibit No. 1 - SHELL KAST Laydown Yard Exhibit 052915, 2. Exhibit No. 2-Carousel Tract Environmental Investigation Timeline, 3. Exhibit No. 3 - Water Board Notification of Work

Date	Ver.	Action By	Action	Result
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## Report to Mayor and City Council

Tuesday, August 18, 2015

Discussion

### SUBJECT:

**CONSIDER STATUS REPORT ON THE REGIONAL WATER QUALITY CONTROL BOARD ENVIRONMENTAL INVESTIGATION AND CARSON DECLARATION OF THE EXISTENCE OF A LOCAL EMERGENCY WITHIN THE CAROUSEL TRACT (CITY COUNCIL)**

### I. SUMMARY

This item is on the agenda to provide updates at all regularly scheduled City Council meetings related to the environmental investigation of the Carousel Tract.

### II. RECOMMENDATION

CONSIDER and DISCUSS.

### III. ALTERNATIVES

TAKE such other action the City Council deems appropriate that is consistent with

the requirements of law.

#### **IV. BACKGROUND**

##### **History**

The California Regional Water Quality Control Board, Los Angeles (Regional Board) is the lead agency overseeing the environmental investigation and cleanup of the Carousel Tract. The Regional Board issued a Cleanup and Abatement Order No. R4-2011-0046 (CAO) on March 11, 2011 requiring Shell Oil Products US to investigate and clean up discharges of waste in soil and groundwater at the Carousel Tract site.

##### **Shell Kast Construction Laydown Yard**

To reduce the construction impacts to the community, Shell has secured the property at the northwest corner of Main Street and Lomita Boulevard from the Los Angeles County Sanitation Districts to use as their laydown yard. The Shell Kast Construction Laydown Yard will be used to implement the RAP for the Carousel community which is expected to take approximately 6 years to complete (Exhibit No. 1).

The implementation of the RAP will create noise levels that may exceed the Carson's Noise Ordinance single family residential threshold of 65 dBA exterior noise for the long term operation of twenty-one days or more. The consultant, who is coordinating the implementation of the RAP, Design and Consulting Services Group, Environment, has requested that the City of Carson grant a deviation from the 65 dBA exterior noise threshold to 75 dBA during RAP implementation construction period which is expected to take approximately 6 years to complete. The Draft Environmental Impact Report for the Carousel Tract identified that noise levels in residential zones between 65 dBA and 75 dBA are normally unacceptable. Further, the EIR states that noise level impacts associated with RAP efforts are conservatively assumed to remain significant above the City's Noise Ordinance 65 dBA threshold and unavoidable even with implementation of mitigation measures. Staff has responded that it will not support such deviation that would potentially increase unacceptable noise impacts to residents of the Carousel Tract for an extended period of time.

Staff informed the RAP implementation consultant that the Carson Municipal Code Section 9173.4 (A.) Appeals, identifies that any decisions made by the Director pursuant to this Chapter may be appealed to the Commission and subsequently to the City Council.

##### **Residential Sampling Activity**

Testing of property in the Carousel Tract is continuing and the latest reports are posted on the Regional Board's website at:

As of March 10, 2015, the completed Residential Sampling Activity is as follows:

- 272 homes have been screened for Methane. (95%)
- 273 homes have had soils sampled and vapor probes installed. (96%)
- 273 homes have had vapor probes sampled. (95%)
- 261 homes have had indoor air sampled. (91%)
- 244 of 261 homes have had their 2<sup>nd</sup> round of indoor air sampling. (94%)

### **Timeline of Activities**

A general timeline that tracks past and current activities of the Carousel Tract environmental investigation is included as (Exhibit No. 2).

On August 5, 2015, staff attended an open house discussion for Carson residents hosted by the Los Angeles Water Quality Control Board at the Congresswoman Juanita Millender-McDonald Community Center. Water Board staff identified the status of remediation work at the Carousel Tract including the geotechnical investigation that began on July 27, 2015 in the front yards of properties identified for excavation. The work involved using a track-mounted drilling rig to collect soil samples to either 10 or 20 feet below the ground surface at each location (Exhibit No. 3).

At the August 5 open house, residents were encouraged to ask questions related to the duration of the project, how the “move out” would work while work was being performed, how the Board would handle uncooperative owners, whether residents would have access to their property during construction, traffic impacts during construction, noise mitigation and monitoring during construction, what type of backyard hardscape would remain in place and what would be removed, how specific landscaping elements (i.e. very mature trees) could be “saved” during the remediation, site security during construction (i.e. level of security of their vacant homes), the type of temporary housing arrangements Shell is considering, and many others.

In addition to Board and city staff, the Shell project manager participated and was asked questions directly. Input received at this meeting will assist Shell in preparing the Remediation Design Implementation Plan (RDIP), which is the property-by-property plan for excavation, remediation and replacement/restoration of the properties. That plan will be submitted to the Board this fall. Construction work is anticipated to commence in early 2016 in a phased manner.

## **V. FISCAL IMPACT**

None.

**VI. EXHIBITS**

1. Shell Kast Laydown Yard Exhibit 5-29-15. (pg. 4)
2. Carousel Tract Environmental Investigation Timeline. (pgs. 5-13)
3. Water Board Notification on Work (pgs. 14-16)

Prepared by: Zak Gonzalez II, Associate Planner, Planning Division



## Carousel Tract Environmental Investigation Timeline

Date	Significant Actions/Reports	Notes
March 11, 2008	DTSC informed LARWQCB about former Shell Oil Company Tank Farm	
May 2008	LAWRQCB initiated an environmental investigation	
December 2008	LAWRQCB approved proposed work plan submitted by Shell to investigate contaminates of concern	
December 31, 2008	LARWQCB issued California Water Code § 13267 Investigative Order	
October 15, 2009	Shell submitted Final Phase I Site Characterization Report	
March 2011	LARWQCB issued Cleanup and Abatement Order No. R4-201100046	
February 22, 2013	Shell submitted <i>Site-Specific Cleanup Goal Report</i>	
May 2013	LAWRQCB issued a fact sheet providing information and advising of comment period for <i>Site-Specific Cleanup Goal Report</i>	30-day comment period ending June 24, 2013
June 24, 2013	City submitted comments to <i>Site-Specific Cleanup Goal Report</i>	Forwarded reports by Everett & Associates and Soil/Water/Air Protection Enterprise
July 18, 2013	City Council conducted workshop to allow presentation by Mr. Sam Unger, Executive Director of LARWQCB	Presentation by Dr. Lorene Everett and James T. Wells PhD raising concerns related to environmental conditions
July 29, 2013	City Council adopted Resolution No. 13-081 declaring the existence of an emergency in the Carousel Tract	
July 30, 2013	Letters sent to the Governor, Attorney General, Los Angeles County Board of Supervisors and Mr. Unger	Requested immediate assistance due to emergency conditions in Carousel Tract
July 31, 2013	City staff, Mr. Bob Bowcock, Dr. Everett and Mr. Wells met with representatives of Los Angeles County Fire Department and Los Angeles County Department of Public Health	City Council declaration of emergency conditions discussed and copies of Everett & Associates reports transmitted for review

## Carousel Tract Environmental Investigation Timeline

Date	Significant Actions/Reports	Notes
August 21, 2013	LARWQCB sent detailed letter to Shell denying proposed site-specific cleanup goals and requiring revisions to be submitted by October 21, 2013	LARWQCB incorporated OEHHA Memorandum dated July 22, 2013 and UCLA Expert Panel Interim Report dated July 24, 2013
September 11, 2013	City letter to Mr. Sam Unger	Expressing appreciation from City Council and community for response to <i>Site-Specific Cleanup Goal Report</i>
September 24, 2013	LARWQCB community open house CEQA scoping meeting	Request for input from community and public agencies related to evaluation of environmental impacts; comment period ends on October 8, 2013
September 30 – October 10, 2013	LARWQCB Public Participation Specialist to conduct office hours at Carson City Hall	Opportunity for LARWQCB to meet with residents and community stakeholders
October 8, 2013	CEQA scoping comments due to LARWQCB from September 9 through October 8, 2013	Comment letters sent by City of Carson and Bob Bowcock/Barbara Post
October 10, 2013	City staff arranging for a meeting with LARWQCB, LACoFD, Los Angeles County Department of Public Health, OEHHA, Mr. Bowcock, Dr. Everett and Mr. Wells PhD	Review of technical reports and discussion of public agencies responses and actions
October 21, 2013	Shell submitted a <i>Revised Site-Specific Cleanup Goal Report</i> to LARWQCB	Shell proposed to evaluate options that provide excavation in specific areas and does not include any further evaluation associated with the removal of homes
October 24, 2013	Los Angeles County Department of Public Health Letter to City of Carson	Letter states there is not an immediate health threat from site conditions

## Carousel Tract Environmental Investigation Timeline

Date	Significant Actions/Reports	Notes
October 30, 2013	LARWQCB letter to Shell for review of <i>Community Outdoor Air Sampling and Analysis Report</i>	Based on statistical tests, LARWQCB concludes that outdoor air concentrations do not differ between the site and surrounding area. Shell is required to address OEHHA comments and to develop a work plan for an additional soil-vapor survey by November 29, 2013. LARWQCB determined on January 13, 2014 that no further evaluation required
October 31, 2013	LARWQCB notice on <i>Proposed Draft Revised Cleanup and Abatement Order No. R4-2011-0046</i>	The proposed draft order names Dole Food Company, Inc. as an additional responsible party. Comments and evidence must be submitted by 12:00 p.m. on December 6, 2013. Dole Food Company has requested an extension to January 2014 to provide comments. LARWQCB approved extension to January 13, 2014. On January 7, 2014, Regional Board approved extension to January 21, 2014
November 12, 2013	Letter to Carousel Tract Owners and Occupants advising of November 19, 2013 City Council Workshop	
November 19, 2013	City Council conducted workshop with Los Angeles County Department of Public Health and Los Angeles County Fire Department	
January 8, 2014	LARWQCB response to <i>Assessment of Environmental Impact and Feasibility of Removal of Residual Concrete Reservoir Slabs</i>	Directs Shell to either remove the residential concrete slabs as appropriate or isolate the residual concrete slabs beneath the foundation of the homes and paved areas using engineering techniques to the extent necessary to address long term health risks or nuisance concerns

## Carousel Tract Environmental Investigation Timeline

Date	Significant Actions/Reports	Notes
January 13, 2014	LARWQCB response to <i>Revised Community Outdoor Air Sampling and Analysis Report</i>	LARWQCB concludes that outdoor air concentrations do not differ between the site and surrounding area. No further evaluation required
January 21, 2014	Dole response to <i>Proposed Draft Revised Cleanup and Abatement Order No. R4-2011-0046</i>	Dole requested to not be included in the Draft Order since their subsidiary, Barclay Hollander Corporation, did not discharge any of the contaminants of concern
January 23, 2014	Community meeting organized by Congresswoman Hahn	Meeting to hear from residents and discuss options for obtaining improved levels of response from the Regional Board
January 23, 2014	LARWQCB response to <i>Revised Site-Specific Cleanup Goal Report</i>	LARWQCB identified deficiencies in the Shell Revised Report and directed a remedial action plan, Human Health Risk Assessment and other environmental documents be submitted by March 10, 2014
February 10, 2014	LARWQCB clarification and revision to their January 8, 2014 letter (effective date of January 13, 2014) regarding the Residential Concrete Slab Report	LARWQCB removed reference to regulations for underground storage tanks
February 23, 2014	Shell submitted a Petition for Review and Request for Hearing to the State Water Resources Control Board in the matter of Cleanup and Abatement Order R4-2011-0046 (CAO)	The State Water Resources Control Board has not responded to Shell's petition
March 10, 2014	Shell submitted Remedial Action Plan (RAP), Human Health Risk Assessment (HHRA), and draft environmental documents to LARWQCB	LARWQCB set a tentative period of 30 day to review the documents and provide opportunity for public viewing
March 19, 2014	LARWQCB filed Notice of Preparation (NOP)	Preparation of a draft Environmental Impact Report in accordance to the California Environmental Quality Act (CEQA)
March 25, 2014	LARWQCB and PCR Service Corporation met with City's staff	As part of the draft Environmental Impact Report, staff discussed transportation, noise, and odor concerns with LARWQCB and PCR

## Carousel Tract Environmental Investigation Timeline

April 18, 2014	LARWQCB received comments from LAUSD regarding the NOP	LARWQCB is reviewing LAUSD comments and will provide response
April 30, 2014	LARWQCB responded to Shell's RAP, FS, and HHRA	LARWQCB rejected Shell's proposed cleanup plan and revised RAP to be submitted by Shell by June 16, 2014 by 5 p.m.
April 30, 2014	LARWQCB issued notice of violation (NOV) to Shell for failure to submit a RAP based on approved site-specific cleanup goals	LARWQCB directed Shell to comply by June 16, 2014
May 23, 2014	LARWQCB met with Shell regarding the RAP	LARWQCB discussed deficiencies and revisions with Shell
June 3, 2014	LARWQCB issued notice of opportunity for additional public comment	The deadline to submit public comments is 5 p.m. on June 16, 2014
June 4, 2014	LARWQCB granted Shell a two-week extension to submit the revised RAP, FS, and HHRA	The revised documents are due on June 30, 2014
June 16, 2014	Shell submitted additional comments regarding the Proposed Revised Draft Cleanup and Abatement Order No. RB4-2011-0046	The Regional Board is reviewing Shell's comments
June 30, 2014	Shell submitted the revised RAP, FS, and HHRA to the Regional Board	The Regional Board is reviewing the revised documents
July 7, 2014	The City of Carson sent a letter notifying the Carousel Tract residents of the availability of the RAP, FS, and HHRA via the Regional Board	The documents are part of the draft EIR process

## Carousel Tract Environmental Investigation Timeline

	website	
July 22, 2014	The Regional Board is reviewing the RAP, FS, HHRA and preparing the draft EIR. Testing of property in the Carousel Tract is ongoing	Testing result and the Regional Board latest activities are available at: <a href="http://geotracker.waterboards.ca.gov/">http://geotracker.waterboards.ca.gov/</a>
August 25, 2014	The Regional Board is reviewing the RAP, FS, HHRA and preparing the draft EIR.	No new dates set for meeting with the Carousel Tract residents
August 27, 2014	The Regional Board released August 2014 community update for the Carousel Tract	Tentative release of proposed RAP and Draft EIR in mid October 2014
September 19, 2014	Shell submitted the RAP Relocation Plan to the Regional Board	Tentative release of proposed RAP and Draft EIR at end of October 2014, and meeting with the Carousel Tract resident is projected to begin on November 2014
October 8, 2014	The Regional Board continues preparation of Draft EIR and review of the RAP	The Regional Board required the RAP addendums to be submitted by Shell on October 20, 2014. Meeting with the Carousel Tract residents is projected to occur in the middle of November 2014
October 15, 2014	The Regional Board scheduled community meetings	The Regional Board mailed invitations of community meetings to the Carousel Tract residents
October 15, 2014	Shell submitted addendums to the RAP, FS, and HHRA	The documents are posted on the Regional Board website
November 5, 2014	The Regional Board released the draft EIR proposed RAP for public review and comment	The draft EIR, proposed RAP and support documents are available at the Carson Library, the Los Angeles Regional Board Office and website

## Carousel Tract Environmental Investigation Timeline

November 12,15,18,20, 2014	The Regional Board held community group meetings with Carousel Tract residents	The discussion was centered on the draft EIR and proposed RAP
November 22, 2014	The Regional Board hosted a public meeting at the Carson Community Center	The discussion centered on the draft EIR and proposed RAP
December 3, 2014	City of Carson Environmental Commission received the draft EIR and proposed RAP for review	City staff will submit the Commission's comments to the Regional Board
December 8, 2014	The Regional Board notified Dole Food Company Inc. (Dole) of its intention to revise the Cleanup and Abatement Order No. R4-2011-0046 CAO)	Barclay Hollander Corporation (Barclay), a wholly-owned subsidiary of Dole, to be named as responsible parties to the Carousel Tract contamination
December 24, 2014	Barclay sent a written request to the Regional Board	Barclay submitted additional written evidence, and schedule a formal evidentiary hearing with the Regional Board
January 6, 2015	Barclay sent a follow up letter to its December 24, 2014 Letter to the Regional Board	Barclay submitted additional documentary evidence to the Regional Board
January 6, 2015	Shell sent a letter to the Regional Board	Shell is opposed to Barclay's requests to submit additional evidence and for a formal evidentiary hearing
January 7, 2015	Integrated Resource Management, Inc. (IRM) responded to Barclay's December 24, 2014 Letter	IRM requested appropriate notice and opportunity to be heard for Carousel Tract residents. IRM also commented on the substance of the revised CAO and attached documentary evidence
January 9, 2015	The Regional Board sent an electronic letter to all interest parties	The Regional Board will consider additional comments on pending procedural request by 5 p.m., January 16, 2015

## Carousel Tract Environmental Investigation Timeline

January 15, 2015	Site Cleanup Program Staff (SCP Staff) of the regional Board sent a response letter objecting inclusion of additional evidence into the record as requested by Barclay Hollander Corporation (Barclay)	SPC Staff is requesting opportunity to respond if a hearing for additional evidence is granted by the Chief Deputy Executive Officer of the Regional Board
January 16, 2015	Barclay sent a letter to the Regional Board	Barclay clarified its scope to submit additional evidence, seek clarification from the Regional Board, and request timing of evidential hearing.
February 20, 2015	The Regional Board released a "Notification of Work" to the public	Land (public streets) and aerial photographic survey activities are tentatively scheduled from March 2, 2015 to March 20, 2015 for the Carousel Tract and surrounding area
February 27, 2015	The Regional Board replied to parties and interested persons	The Regional Board accepted Mr. George Bach deposition dated November 19, 2014 into administrative record
March 11, 2015	The SCP Staff provided explanations to assumptions and copies of graphic results	The explanation addressed the three assumptions in memo dated March 20, 2014 from Dr. C.P. Lai to SCP Staff
April 2, 2015	SCP Staff, Barclay, and Shell submitted comments to the Regional Board regarding the revised CAO	Barclay is requesting inclusion of Mr. George Bach deposition dated November 19, 2014 into administrative record. SCP Staff and Shell opposed its inclusion
April 17, 2015	The Regional Board sent letter to all parties and interested persons	Informing all parties and interest persons of the separation of functions between the Advising Team and SCP Staff. The Regional Board intends to issued final action regarding Tentative Revised CAO on or after April 24, 2015
April 22, 2015	Barclay sent a letter to the Regional Board	Barclay is requesting delay of final action regarding the Tentative Revised CAO until depositions of the SCP Staff are completed

## Carousel Tract Environmental Investigation Timeline

April 30, 2015	Regional Board sent a letter to Dole and Barclay aka (BHC)	The Regional Board issued the Revised CAO adding Dole and Barclay as responsible parties
May 21, 2015	Barclay sent a letter to the Regional Board	Barclay requests stay and reconsideration of the Revised CAO
June 1, 2015	The Regional Board reported that Barclay filed a petition with State Water Board	Barclay is requesting the State Water Board to Review, petition for stay, and petition to submit supplemental evidence and to conduct a hearing
June 22, 2015	The Regional Board provided a copy of Barclay petition to the State Water Board	The Regional Board and Shell are proceeding with their work in the Carousel Tract regardless of the outcome of Barclay's petition

## Los Angeles Regional Water Quality Control Board

*Si necesita información en español, por favor llame a Susana Lagudis, Participación Pública: 213-576-6694*

### NOTIFICATION OF WORK (July 2015) Geotechnical Investigation Carousel Tract and Surrounding Area

Under the direction of the Regional Water Quality Control Board, consultants hired by Shell Oil Products US will be performing geotechnical investigations in the Carousel neighborhood as part of the initial activities to support implementation of the approved Remedial Action Plan (RAP). Shell Oil Products US and its contractors will be contacting the owners and residents of the properties where the work will take place to answer questions and schedule this work.

**WHERE:** In the front yards of properties identified for excavation. A Table is attached showing the addresses where this work will be performed.

**WHEN:** Beginning on or about July 27, 2015

**WHAT:** The work involves using a track-mounted drilling rig to collect soil samples to either 10 or 20 feet below the ground surface at each location. A plug of grass from the lawn will be removed from the boring areas and set aside. After drilling is complete and the boreholes have been backfilled, the grass will be replaced to restore the lawn. As a safety measure and to protect against encountering underground utilities, Underground Services Alert will be contacted prior to starting the work.

A photo of a typical drilling rig is included. The drilling rig has a drive hammer that is used to drive the sampler into the ground and recover soil samples for testing. During short-term periods of up to approximately 5 minutes, elevated sound levels may occur in the vicinity of the rig.

For more information, please contact:  
Dr. Teklewold Ayalew, Regional Board Project Manager  
(213) 576-6739 [Teklewold.Ayalew@waterboards.ca.gov](mailto:Teklewold.Ayalew@waterboards.ca.gov)

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Roy Patterson, VP and Sr. Principal Geologist  
AECOM: 714-433-7699 or 714-227-5924  
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For project-related documents please visit:  
<http://bit.do/kast>



Thank you for your patience and cooperation.

## Los Angeles Regional Water Quality Control Board

*Si necesita información en español, por favor llame a Susana Lagudis, Participación Pública: 213-576-6694*

### AVISO DE TRABAJO (Julio 2015) Estudio de Mecánica de Suelos Comunidad Carousel y Alrededores

Bajo la dirección de la Junta Regional de Control de Calidad de Agua de Los Angeles, los consultores contratados por Shell Oil Products U.S. realizarán una serie de estudios de mecánica de suelos (estudios geotécnicos) en la Comunidad Carousel como parte de las actividades preliminares para implementar el Plan de Acción de Remediación (RAP). Shell Oil Products U.S. y sus contratistas contactarán a los dueños y residentes de las propiedades donde se llevará a cabo el trabajo para proporcionar información, contestar sus preguntas y programar las obras.

**DONDE:** En los jardines delanteros de las propiedades identificadas para la excavación. Se anexa una Lista indicando las direcciones de las propiedades en donde se realizarán estas obras.

**CUANDO:** Iniciando el 27 de Julio de 2015 aproximadamente

**QUE:** Las obras consiste en usar una perforadora para obtener muestras del suelo a una profundidad a 10 o 20 pies en cada punto de muestreo. El hueco dejado por la perforación será rellenado, y el pasto será colocado nuevamente. Como medida de seguridad y protección de los servicios públicos ubicados bajo el suelo, la compañía Underground Services Alert será avisado antes de iniciar la obra.

Se incluye una fotografía de una típica perforadora. La perforadora tiene un martillo hidráulico que se usa para perforar el suelo y obtener muestras de suelo para analizar. Durante periodos de hasta 5 minutos, niveles elevados de ruido pueden ocurrir en el área alrededor de la perforadora.

Para mayor información, llame a:  
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(213) 576-6739 [Teklewold.Ayalew@waterboards.ca.gov](mailto:Teklewold.Ayalew@waterboards.ca.gov)

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Roy Patterson, VP and Sr. Principal Geologist  
AECOM: 714-433-7699 o 714-227-5924  
[roy.patterson@aecom.com](mailto:roy.patterson@aecom.com)

Para documentos relacionados con el Proyecto:  
<http://bit.do/kast>



Gracias por su paciencia y cooperación

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)

Planned addresses for Geotechnical work

Address	Street	Proposed Boring Depth
305	E. 244th Street	10 FT
321	E. 244th Street	10 FT
337	E. 244th Street	10 FT
357	E. 244th Street	10 FT
348	E. 248th Street	20 FT
360	E. 248th Street	20 FT
345	E. 249th Street	10 FT
348	E. 249th Street	10 FT
363	E. 249th Street	20 FT
377	E. 249th Street	20 FT
378	E. 249th Street	10 FT
412	E. 249th Street	10 FT
24406	MARBELLA	20 FT
24411	MARBELLA	10 FT
24512	MARBELLA	20 FT
24517	MARBELLA	10 FT
24606	MARBELLA	20 FT
24613	MARBELLA	10 FT
24616	MARBELLA	20 FT
24628	MARBELLA	20 FT
24703	MARBELLA	10 FT
24706	MARBELLA	20 FT
24716	MARBELLA	20 FT
24717	MARBELLA	10 FT
24733	MARBELLA	10 FT
24744	MARBELLA	10 FT
24402	NEPTUNE	20 FT
24409	NEPTUNE	20 FT
24503	NEPTUNE	20 FT
24508	NEPTUNE	20 FT
24518	NEPTUNE	20 FT
24522	NEPTUNE	20 FT
24523	NEPTUNE	20 FT
24603	NEPTUNE	20 FT
24613	NEPTUNE	20 FT
24622	NEPTUNE	20 FT
24629	NEPTUNE	20 FT
24703	NEPTUNE	20 FT

Address	Street	Proposed Boring Depth
24712	NEPTUNE	20 FT
24729	NEPTUNE	10 FT
24732	NEPTUNE	20 FT
24803	NEPTUNE	10 FT
24402	PANAMA	10 FT
24411	PANAMA	20 FT
24421	PANAMA	20 FT
24426	PANAMA	10 FT
24503	PANAMA	20 FT
24533	PANAMA	10 FT
24608	PANAMA	10 FT
24618	PANAMA	10 FT
24708	PANAMA	10 FT
24709	PANAMA	20 FT
24719	PANAMA	10 FT
24722	PANAMA	10 FT
24738	PANAMA	10 FT
24803	PANAMA	20 FT
24812	PANAMA	10 FT
24819	PANAMA	20 FT
24833	PANAMA	10 FT
24412	RAVENNA	20 FT
24416	RAVENNA	10 FT
24423	RAVENNA	10 FT
24426	RAVENNA	20 FT
24508	RAVENNA	20 FT
24509	RAVENNA	20 FT
24522	RAVENNA	20 FT
24609	RAVENNA	10 FT
24612	RAVENNA	10 FT
24706	RAVENNA	10 FT
24709	RAVENNA	20 FT
24719	RAVENNA	20 FT
24732	RAVENNA	10 FT
24739	RAVENNA	20 FT
24749	RAVENNA	20 FT
24752	RAVENNA	20 FT