

ANANIA GEOLOGIC ENGINEERING

November 13, 1989

Dear Mr. Alex Saschin:

Please find enclosed the following items in our Air Permit Application package for a vapor extraction system at Carnation Dairies, 1310 14th Street, Oakland, California:

Application for Authority to Construct and Permit to Operate

Plant Data P-201

Data Form A

Data Form C

Data Form G

Data Form P

Site History and Vapor Recovery Description

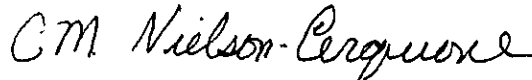
Design Drawing Of Vapor Extraction Unit

Topographic Map with Site Location

Analytical Data of Pilot Test

We trust we have included all the information you require to issue an Air Permit. If you require any additional information or have any questions please do not hesitate to call either myself at (415) 234-4461 or Todd Galati at (916) 631-0154.

Sincerely,



Chris Nielson-Cerquone,
Operations Manager

cc: Mr. Howard Shmuckler, Carnation
Mr. Jim Person, Carnation
Ms. Katherine Chesick, Alameda County
Mr. Lester Feldman, RWQCB

CALIFORNIA REGIONAL WATER

NOV 17 1989

QUALITY CONTROL BOARD

ANANIA GEOLOGIC ENGINEERING

VAPOR EXTRACTION AIR PERMIT APPLICATION
CARNATION DAIRY FACILITY
1310 14TH STREET
OAKLAND, CALIFORNIA

AGE PROJECT NUMBERS 004-88-059, 004-89-093, AND 004-89-096

NOVEMBER 13, 1989

1.0 PROJECT DESCRIPTION AND HISTORY

Anania Geologic Engineering (AGE) is currently investigating and remediating the contaminated soil and groundwater associated with the leaking underground fuel tanks at the Carnation Dairy Facility located at 1310 14th Street in Oakland, California. For years the facility was an ice cream and milk production facility. Current activity at the facility consists of storage and distribution operations.

A large warehouse with several storage and service bays occupies the northwest corner of the facility. Two 10,000 gallon gasoline tanks, two 12,000 gallon diesel tanks and one 1,000 gallon waste oil tank were located south of the service bays. The tanks were removed in early January 1989. Free product was observed in the excavation. With the exception of the waste oil tank, the steel tanks appeared competent and did not have visible holes at the time of their removal. The soil under the product lines was heavily stained and the evidence suggested leaking pipelines as a source of contamination.

Fuel leaks associated with the former gasoline and diesel tanks have resulted in contamination of the soil and groundwater in the northwest portion of the Carnation facility. The predominant soil types at the site are silty sands and fine sands. The depth to groundwater at the site is approximately ten feet below ground surface. A skimming system has been installed at the site to recover free product. Monitoring wells have been installed and sampled to determine the extent of the contaminant plume to monitor progress of the remediation efforts. Groundwater cleanup will be accomplished using groundwater extraction in conjunction with a separator and carbon adsorption system. Volatile hydrocarbons in the vadose zone will be removed with a vapor extraction system.

2.0 VAPOR EXTRACTION

Vapor extraction is the process by which volatile compounds are removed from soil through forced or drawn air currents. Vapor extraction involves the removal of volatile organic compounds from subsurface soils by mechanically drawing air through the soil matrix. The volatile organics are pumped through an internal combustion engine where they are physically destroyed, producing carbon dioxide and water as byproducts. Petroleum products contain hundreds of distinct hydrocarbons with varying chemical and physical properties which make some products more amenable than others to removal by vapor extraction. Generally, compounds with higher vapor pressure and lower solubility in water are more efficiently removed or stripped from the soil matrix. Gasoline contains a high content of volatile organic compounds and therefore vapor extraction is an effective treatment for gasoline contaminated soils.

A pilot test of the vapor extraction system was performed at the site on October 11, 1989. The analytical results are included on the application for a permit. The laboratory report and Chain of Custody are attached as well

BAY AREA

AIR QUALITY MANAGEMENT DISTRICT

939 Ellis Street, San Francisco
California 94109
(415) 771-6000

PLANT DATA P-201

Plant Identification No.

Carnation Dairies
Business Name

N/A
Other Business Name(s) (if any)

(415) 451-8161
Plant Telephone Number

Carnation Companies
Name of Parent Company (if any)

PLANT ADDRESS: 1310 14th Street

MAILING ADDRESS 5045 Wilshire Blvd.

Oakland, California 94607
City State Zip Code

Los Angeles, California 90036
City State Zip Code

PLANT AREA (Acres) 5.7

NUMBER OF EMPLOYEES 115

PRINCIPAL PRODUCT Dairy products
(ice cream)

OWNERSHIP:

- Private
- Utility
- Local Government
- State Government
- Federal Government

Please submit a name and address to whom
all correspondence regarding air pollution
control can be sent.

Anania Geologic Engineering
Todd Galati, Project Manager
Contact Name & Title

11330 Sunrise Park Drive, Suite C
Street Address

Rancho Cordova, California 95742
City State Zip Code

*Plant Identification
Numbers are assigned
by the BAAQMD. Leave
blank if number is not
known.

Todd Galati, Project Manager
Name & Title of person preparing this form

PERMIT SERVICES DIVISION
BAY AREA AIR QUALITY MANAGEMENT DISTRICT
 939 Ellis Street, San Francisco, CA. 94109
 (415) 771-6000

BAAQMD PLANT NO. _____

APPLICATION NO. _____

APPLICATION FOR AUTHORITY TO CONSTRUCT AND PERMIT TO OPERATE
INDUSTRIAL SOURCES

BUSINESS NAME Carnation Company

MAILING ADDRESS 1310 14th St., Oakland, CA 94607

PLANT ADDRESS Same as above

NAME OF CONTACT Todd Galati PHONE (916) 631-0154

EQUIPMENT DESCRIPTION Vapor Extraction System

NUMBER OF SOURCES [] NEW CONSTRUCTION [] MODIFICATION [] REPLACEMENT []

RELOCATION [] DEMOLITION OR SHUT DOWN [] TRANSFER OF OWNERSHIP []

ABATEMENT EQUIPMENT ONLY [x]

HAS AN ENVIRONMENTAL IMPACT REPORT (EIR) BEEN PREPARED FOR THIS PROJECT? YES _____ NO x

IF YES, BY WHOM? _____

IS THIS APPLICATION A RESULT OF A VIOLATION NOTICE? YES _____ NO x

IF YES, GIVE THE VIOLATION NOTICE NUMBER: _____

TOTAL EMISSIONS FOR THIS APPLICATION: _____ (SEE FORM P-202 FOR DETAILS)

EMISSIONS IN LB/HR				
TSP	NMHC	SOx	NOx	CO
0				

TYPICAL USAGE RATE: HOURS/DAY 10; DAYS/WEEK 5; WEEKS/YEAR 52

ARE OFFSETS OR TRADEOFFS INVOLVED IN THIS APPLICATION? YES _____ NO x

IF YES, GIVE DOCUMENTS AND PAGE NUMBERS ON WHICH THIS INFORMATION IS PROVIDED: _____

(OVER)

HAVE YOU PROVIDED AN AIR QUALITY ANALYSIS? YES X NO

IF YES, GIVE DOCUMENTS AND PAGE NUMBERS ON WHICH THIS INFORMATION IS PROVIDED: 10-14

THE FOLLOWING ITEMS SHOULD ACCOMPANY THIS APPLICATION: (a) Topographical Map showing the location of this facility; (b) Process Flow Diagram (if applicable) and; (c) a description or manufacturer's catalogue of equipment and air pollution abatement equipment. (See AB884-Lists and Criteria for further details.

IMPORTANT: All information that you submit will be considered as public information unless you indicate that it is considered TRADE SECRET and give the reasons.

[] ACKNOWLEDGEMENT

SIGNATURE C. M. Nielson-Cerquone TITLE Operations Manager
NAME (PRINTED) Chris Nielson-Cerquone DATE 11/13/89

NOTE: PERMITS FOR YOUR PROJECT MAY ALSO BE REQUIRED FROM OTHER AGENCIES. FOR FURTHER INFORMATION, YOU SHOULD CONTACT THE LOCAL CITY OR COUNTY OFFICE IN WHICH THE PROPOSED PROJECT WILL BE LOCATED. ALSO, THE OFFICE OF PERMIT ASSISTANCE WITHIN THE OFFICE OF PLANNING AND RESEARCH IN SACRAMENTO IS AVAILABLE TO PROVIDE INFORMATION ON PERMITTING. THE ADDRESS IS AS FOLLOWS:

OFFICE OF PLANNING AND RESEARCH
1400 Tenth Street
Sacramento, California 95814

**BAY AREA
AIR QUALITY MANAGEMENT DISTRICT**

939 Ellis Street, San Francisco, CA
(415) 771-6000 94109

**DATA FORM C
FUEL COMBUSTION SOURCE**

District Use Only	
New	[]
Modified	[]
Retro	[]

Form C is for all operations which burn fuel. If the operation also involves evaporation of any organic solvent, complete Form S and attach to this form. If the operation involves a process which generates any other air pollutants, complete Form G and attach to this form.

Check box if this source has a secondary function as an abatement device for some other source(s); complete Lines 1, 2, & 7-13 on Form A (using the source number below for the Abatement Device No.) and attach to this form.

1. Company Name Carnation Dairies Plant No. _____ Source No. 5
(If Unknown, Leave Blank)

2. Equipment Name and Number, or Description Vapor Extraction System

3. Make, Model Ford CSG-649 6 cyl. engine, 300CID Firing Rate _____ BTU/Hr

4. Date of Modification or Initial Operation October 4, 1989

5. Primary Use (Check One):
 Electrical Generation Space Heat Waste Disposal Testing
 Abatement Device Cogeneration Resource Recovery Other
 Process Heat; Material Heated

6. SIC Number _____
(If Unknown, Leave Blank)

7. Equipment Type (Check One):

<u>Internal Combustion</u>	<input type="checkbox"/> Diesel Engine <input type="checkbox"/> Otto Cycle Engine <input checked="" type="checkbox"/> Gas Turbine <input type="checkbox"/> Other	Displacement <u>300</u> cubic inches <u>126</u> hp at 3600 RPM
<u>Incinerator</u>	<input type="checkbox"/> Salvage Operation <input type="checkbox"/> Liquid Waste <input type="checkbox"/> Pathological Waste <input type="checkbox"/> Other	Temperature _____ °F Residence Time _____ Sec
<u>Others</u>	<input type="checkbox"/> Boiler <input type="checkbox"/> Afterburner <input type="checkbox"/> Flare <input type="checkbox"/> Open Burning <input type="checkbox"/> Other	<input type="checkbox"/> Dryer <input type="checkbox"/> Oven <input type="checkbox"/> Furnace <input type="checkbox"/> Kiln Material dried, baked, or heated

8. Yes No Overfire Air? If Yes, what percent (%) _____

9. Yes No Flue Gas Recirculation? If Yes, what percent (%) _____

10. Yes No Air Preheat? Temperature _____ °F

11. Yes No Low NOx Burners? Make, Model _____

12. Maximum Flame Temperature N/A °F

13. Combustion Products: Wet Gas Flow Rate 225 acfm at 900 °F
 Typical Oxygen Content _____ dry volume % or _____ wet volume %
 or 64 % excess air

14. Typical Use: Hours/Day 10 Days/Week 5 Weeks/Year 52

15. Typical % of Annual Total: Dec-Feb 17.5 % Mar-May 17.5 % Jun-Aug 35 % Sep-Nov 30 %

16. With regard to air pollutant flow, what source(s) or abatement device(s) are immediately upstream?
S cat. smuffler S S S S A A A

17. With regard to air pollutant flow, what source(s), abatement device(s), and/or emission points are immediately downstream?
S S A A P P

FUELS

INSTRUCTIONS: Complete one line in Section A for each fuel. Section B is OPTIONAL. Please use the units at the bottom of each table. N/A means "Not Applicable".

SECTION A: Fuel Data

	Fuel Name	Fuel Code **	Total Annual Usage ***	Maximum Possible Fuel Use Rate	Typical Heat Content	Sulfur Content	Nitrogen Content (OPTIONAL)	Ash Content (OPTIONAL)
1.	Propane	198	620	0.31	N/A	N/A	N/A	N/A
2.								
3.								
4.								
5.								

Use the appropriate units for each fuel

Natural Gas	Therms*	BTU/Hr	N/A	N/A	N/A	N/A
Other Gas	MSCF*	MSCF/Hr	BTU/MSCF	ppm	N/A	N/A
Liquid	MGAL*	MGAL/Hr	BTU/MGAL	wt %	wt %	wt %
Solid	TONS	Ton/Hr	BTU/Ton	wt %	wt %	wt %

SECTION B: Emission Factors (OPTIONAL)

	Fuel Name	Particulates		NOx		CO		Other _____		Other _____	
		Emission Factor	**Basis	Emission Factor	**Basis	Emission Factor	**Basis	Emission Factor	**Basis	Emission Factor	**Basis
1.											
2.											
3.											
4.											
5.											

Use the appropriate units for each fuel

Natural Gas	lb/Therm
Other Gas	lb/MSCF
Liquid	lb/MGAL
Solid	lb/Ton

NOTES:

* MSCF = thousand standard cubic feet

* MGAL = thousand gallons

* Therm = 100,000 BTU

** See tables below for Fuel and Basis Codes

*** Total Annual Usage is: Projected usage over next 12 months if equipment is new or modified.

: Actual usage for last 12 months if equipment is existing and unchanged.

FUEL CODES

CODE	FUEL	CODE	FUEL
25	Anthracite Coal	189	Natural Gas
33	Bagasse	234	Process Gas - Blast Furnace
35	Bark	235	Process Gas - CO
43	Bituminous Coal	236	Process Gas - Coke Oven Gas
47	Brown Coal	238	Process Gas - RMG
242	Bunker C Fuel Oil	237	Process Gas - Other
80	Coke	242	Residual Oil
89	Crude Oil	495	RDF
98	Diesel Oil	493	Sludge Gas
493	Digester Gas	256	Solid Propellant
100	Distillate Oil	257	Solid Waste
128	Gasoline	304	Wood - Hogged
158	Jet Fuel	305	Wood - Other
160	LPG	198	Other - Gaseous Fuels
165	Lignite	200	Other - Liquid Fuels
167	Liquid Waste	203	Other - Solid Fuels
494	Municipal Solid Waste		

BASIS CODES

CODE	METHOD
0	Not applicable for this pollutant
1	Source testing or other measurement <u>by plant</u> (attach copy)
2	Source testing or other measurement <u>by BAAQMD</u> (give date)
3	Specifications from vendor (attach copy)
4	Material balance <u>by plant</u> using engineering expertise and knowledge of process
5	Material balance by BAAQMD
6	Taken from AP-42 (Compilation of Air Pollutant Emission Factors, EPA)
7	Taken from literature, other than AP-42 (attach copy)
8	Guess

BAY AREA
AIR QUALITY MANAGEMENT DISTRICT
 939 Ellis Street, San Francisco, CA 94109 (415) 771-6000

DATA FORM G
General Air Pollution Source

If in addition to the general process described hereon this source burns fuel, then complete Form C also.
 Use specific forms if applicable: Form T (organic tankage, loading), Form S (surface coating, solvent use).

1 Business Name: Carnation Dairies Plant No: _____
 (If unknown, leave blank)

2 SIC Number: _____ Date of Initial Operation: _____

3 Name or Description: Vapor Extraction System Source No.: S

4 Make, Model, and Rated Capacity of Equipment: Ford CSG-649 6 cyl. engine, 300 CID

5 Process Code* (Column A): Incineration Materials Code* (Column B): _____ Usage Unit* (Column C): _____

6 Total throughput, last 12 months: 61,920ft³ Usage Units* Max operating rate: 7200ft³/hr Usage Units*/hr

7 Typical % of total throughput: Dec-Feb 17.5 % Mar-May 17.5 % Jun-Aug 35 % Sep-Nov 30 %

8 Typical operating times: 10 hrs/day 5 days/week 52 weeks/year

9 For batch or cyclic processes: N/A min/cycle N/A min. between cycles

10 Exhaust gases from source: Wet gas flow rate 225 cfm at 900 °F
 (at max. operation) Approximate water vapor content 3% vol %

EMISSION FACTORS (at maximum operating rate)

If this form is being submitted as part of an application for an AUTHORITY TO CONSTRUCT, completion of the following table is mandatory. If not, and the Source is already in operation, completion of table is requested but not required.

If this source also burns fuel, do not include those combustion products in the emission factors below; they are accounted for on Form C. If source test or other data are available for composite emissions only, estimate from those data the emissions attributable to just the general process and show below.

Check box if factors apply to emissions after Abatement Device(s).

		EMISSION FACTORS lbs/Usage Unit*	Basis Code (see reverse)
11	Particulate	0ppm	1
12	Organics	0ppm	1
13	Nitrogen Oxides (as NO ₂). .	0	1
14	Sulfur Dioxide	0	1
15	Carbon Monoxide	1ppm	1
16	Other: _____		
17	Other: _____		

18 With regard to air pollutant flow from this source, what source(s), abatement device(s) and/or emission points(s) are immediately downstream? S cat.conv S muffler S

A cat.conv A muffler A P stack P P P P

*From Tables G-1 through G-7 (See listing on reverse side)

BAY AREA
AIR QUALITY MANAGEMENT DISTRICT
 939 Ellis Street, San Francisco, CA 94109 (415) 771-6000

DATA FORM A
ABATEMENT DEVICE

Abatement Device: Equipment/process whose primary purpose is to reduce the quantity of pollutant(s) emitted to the atmosphere.

1. Business Name: Carnation Dairies Plant No.: _____
(If unknown, leave blank)

2. Name or Description: Vapor Extraction System Abatement Device No.: A

3. Make, Model and Rated Capacity: _____

4. Abatement Device Code (Table on reverse side): 64 Internal Combustion Date of Initial Operation: 10/4/89

5. With regard to air pollutant flow into this abatement device, what source(s) and/or abatement device(s) are immediately upstream?

S S S A A A A A

6. Typical Gas Stream Temperature at Inlet: Ambient °F

If this form is being submitted as part of an application for an AUTHORITY TO CONSTRUCT, completion of the following table is mandatory. If not, and the Abatement Device is already in operation, completion of table is requested but not required.

	POLLUTANT	WEIGHT PERCENT REDUCTION (at typical operation)	BASIS CODE (Codes on reverse side)
7.	Particulate	0 %	
8.	Organics	99.87 %	
9.	Nitrogen Oxides (as NO ₂)	0 %	
10.	Sulfur Dioxide	0 %	
11.	Carbon Monoxide	0 %	
12.	Other: _____	%	
13.	Other: _____	%	

14. Check box if this Abatement Device burns fuel; complete lines 1, 2 and 15-36 on Form C (using the Abatement Device No. above for the Source No.) and attach to this form.

15. With regard to air pollutant flow from this abatement device, what source(s), abatement device(s) and/or emission point(s) are immediately downstream?

S A A P P P P P

BAY AREA
 AIR QUALITY MANAGEMENT DISTRICT
 939 Ellis Street, San Francisco, CA 94109 (415) 771-6000

DATA FORM P
 Emission Point



Form P is for well-defined emission points such as stacks or chimneys only; do not use for windows, room vents, etc.

Business Name: Carnation Dairies Plant No.: _____

Emission Point No.: P

With regard to air pollutant flow into this emission point, what source(s) and/or abatement device(s) are immediately upstream?

S S S A S S S
S S S A A A A

Exit Cross-section Area: .013 Square feet Height above grade: 6 Feet

Effluent Flow from Stack:

	Typical Operating Condition		Maximum Operating Condition	
Actual Wet Gas Flow Rate	225	cfm	350	cfm
Percent Water Vapor	3	Vol %	3	Vol %
Temperature	900	°F	1000	°F

If this stack is equipped to measure (monitor) the emission of any air pollutants,

-is monitoring continuous? No

-what pollutants are monitored? Total petroleum hydrocarbons

Person Completing this Form Todd Galati Date 11/13/89



Revised, edited, and published by the Geologic Institute
 of the USGS USCGS and USACE
 10. - graphs from aerial photos and a topographic map, revised
 a 1947 photogrammetric survey. Revised from 1947 edition and
 taken 1956. Final check 1959
 Hydrography compiled from USCGS charts 8517 and 5535, 1957
 Projection 1927 North American datum
 15,700 feet above datum on California, or, north system, zone 1
 The more detailed features are also plotted.
 15. - 10' contour interval
 16. - 10' contour interval

SCALE 1:24,000
 HORIZONTAL SCALE
 0 100 200 300 400 500 600 700 800 900 1000
 FEET
 0 100 200 300 400 500 600 700 800 900 1000
 METERS
 CONTOUR INTERVAL: 20 FEET
 DOTTED LINES REPRESENT 5 FOOT CONTOURS
 NATIONAL GEOLOGIC VERTICAL DATUM OF 1929
 DEPTH CURVES IN FEET—DATUM IS MEAN LOWER LOW WATER
 (METAL SHOWS REPRESENT THE APPROXIMATE LIFE OF MEAN LOW WATER
 THE HIGH RANGE OF TIDE IS APPROXIMATELY 8 FEET)

ROAD CLASSIFICATION
 ———— Main-duty
 - - - - - Light-duty
 - - - - - Unimproved
 () Interstate Route
 () State Route



OAKLAND WEST, CALIF
 83745—W12215/7 5
 1959

Chilton Environmental Consultants, Inc.

P.O. Box 9019 • 1252 Quarry Lane • Pleasanton, CA 94566 • (415) 426-2600

October 13, 1989

Ms. Mary Scruggs
ANANIA GEOLOGIC ENGINEERING
11330 Sunrise Drive
Rancho Cordova, CA 95742-6542

Client Ref. No.
Work Order No. 8910124
Client Code No. 77665

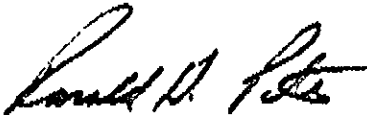
Dear Ms. Scruggs:

Attached is our analytical report for the samples received on October 11, 1989. Results were sent by facsimile to Todd Galati on October 13, 1989. A copy of the Chain-of-Custody form acknowledging receipt of these samples is attached.

Please note that any unused portion of the samples will be disposed of 30 days after the date of this report, unless you have requested otherwise.

We appreciate the opportunity to be of assistance to you. If you have any questions, please contact Maryann Gambino, Client Services Representative, at (415) 426-2657.

Sincerely,



Ronald H. Peters, CIH
Manager, Laboratory Services
Western Operations

RHP/tb
Attachment

BTXE/TPH
THERMAL DESORPTION GC/MS
MODIFIED EPA TO1

Sample I.D.:	3473	Client:	ANANIA
Sample Received:	10/11/89	Client Ref. No.:	
Sample Analyzed:	10/12/89	Lab Client Code:	77665
Sample Matrix:	Tedlar Bag	Lab No.:	8910124-01
Volume Analyzed:	1000 mL		

Compound	Amount (ng)	Concentration (mg/m ³)	Concentration (ppm)	Limit of Detection (ng)
Benzene	40	0.04	0.01	10
Toluene	20	0.02	0.005	10
Ethylbenzene	10	0.01	0.002	10
o-Xylene	<10	<0.01	<0.002	10
m & p- Xylenes	<10	<0.01	<0.002	10
Total Petroleum Hydrocarbons as gasoline	900	<0.9	0.3*	100

ND = Not detected at or above limit of detection

* = Average molecular weight of 72.5 used for calculation

BTXE/TPH
THERMAL DESORPTION GC/MS
MODIFIED EPA TO1

Sample I.D.:	3475	Client:	ANANIA
Sample Received:	10/11/89	Client Ref. No.:	
Sample Analyzed:	10/12/89	Lab Client Code:	77665
Sample Matrix:	Tedlar Bag	Lab No.:	8910124-02
Volume Analyzed:	1 mL		

Compound	Amount (ng)	Concentration (mg/m ³)	Concentration (ppm)	Limit of Detection (ng)
Benzene	470	470	150	10
Toluene	720	720	190	10
Ethylbenzene	40	40	9	10
o-Xylene	30	30	7	10
m & p- Xylenes	110	110	30	10
Total Petroleum Hydrocarbons as gasoline	68,000	68,000	23,000*	100

ND = Not detected at or above limit of detection

* = Average molecular weight of 72.5 used for calculation

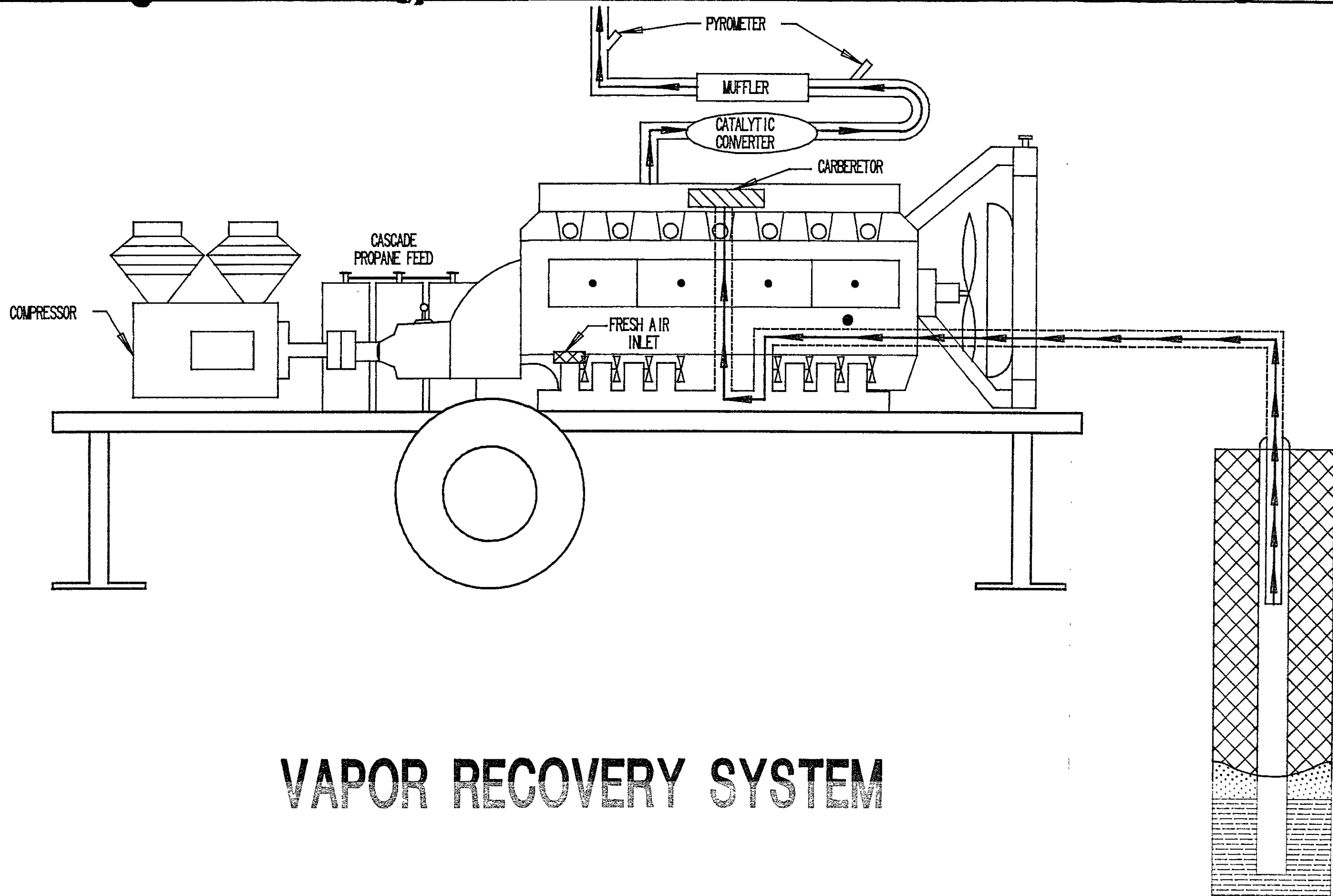
BTXE/TPH
THERMAL DESORPTION GC/MS
MODIFIED EPA TO1

Sample I.D.:	Method Blank	Client:	ANANIA
Sample Received:		Client Ref. No.:	
Sample Analyzed:	10/12/89	Lab Client Code:	77665
Sample Matrix:	Tedlar Bag	Lab No.:	8910124-MB
Volume Analyzed:	1 mL		

Compound	Amount (ng)	Concentration (mg/m ³)	Concentration (ppm)	Limit of Detection (ng)
Benzene	<10	<10	<3	<10
Toluene	<10	<10	<3	<10
Ethylbenzene	<10	<10	<3	<10
o-Xylene	<10	<10	<3	<10
m & p- Xylenes	<10	<10	<3	<10
Total Petroleum Hydrocarbons as gasoline	<100	<100	<30*	<100

ND = Not detected at or above limit of detection

* = Average molecular weight of 72.5 used for calculation



VAPOR RECOVERY SYSTEM