

UNDERGROUND FUEL STORAGE TANKS CLOSURE DOCUMENTATION AND ASSESSMENT REPORT

**RUSS ELLIOT, INC.
2526 WOOD STREET
OAKLAND, CALIFORNIA**

Prepared for:

**ELLIOTT TRUST
C/O VALVA REALTY
OAKLAND, CALIFORNIA**

August 2003

August 20, 2003

Mrs. Jeannette Elliott – Elliott Trust
c/o Mr. Paul Valva
Valva Realty
678 14th Street
Oakland, California 94612

Subject: Underground Fuel Storage Tanks Closure Assessment Report
Russ Elliott, Inc. Facility – 2526 Wood Street, Oakland, California

Dear Mrs. Elliott:

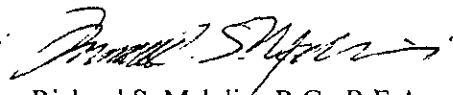
This report documents historical activities associated with the removal of two underground fuel storage tanks (UFSTs) conducted in 1995 and 2002 by other contractors at the referenced property, for which no closure documentation reports were previously prepared. The objective of this report is to organize and provide the UFST removal documentation information made available to Stellar Environmental Solutions (SES) (to satisfy any remaining regulatory agency permit requirements) and to evaluate any residual soil or groundwater contamination in the context of the need for additional work. SES has prepared this report relying wholly on documentation provided to SES by you, your representative, your contractors, and Alameda County Health Department (lead agency).

Trace fuel contamination was detected in soil samples, and concentrations of gasoline, MTBE, and BTEX constituents were detected in the pit water sample at levels above drinking water standards. We recommend herein conducting a Preliminary Site Assessment to further evaluate the extent and magnitude of contamination, as will likely be required by Alameda County Health Department, the lead regulatory agency for petroleum contamination cases. Please contact us at (510) 644-3123 if you have any questions.

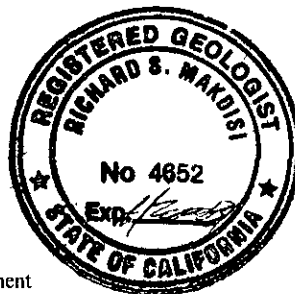
Sincerely,



Bruce Rucker, R.G., R.E.A.
Project Manager



Richard S. Makdisi, R.G., R.E.A.
Principal



cc. Alameda County Environmental Health Department
City of Oakland Fire Department – Office of Emergency Services

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Prepared for:

**ELLIOTT TRUST
C/O VALVA REALTY
678 14TH STREET
OAKLAND, CALIFORNIA 94612**

Prepared by:

**STELLAR ENVIRONMENTAL SOLUTIONS, INC.
2198 SIXTH STREET, SUITE 201
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August 15, 2003

Project No. 2003-41

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1.0 INTRODUCTION

SITE DESCRIPTION

The project site is an active roofing company (Russ Elliot, Inc.) located at 2526 Wood Street, Oakland, Alameda County, California (site). Figure 1 is a site location map. Figure 2 shows the location of the former site underground fuel storage tanks (UFSTs) in relation to the site buildings and adjacent streets. The current owner of the site is the Elliott Trust, which owned the property at the time both UFSTs were removed.

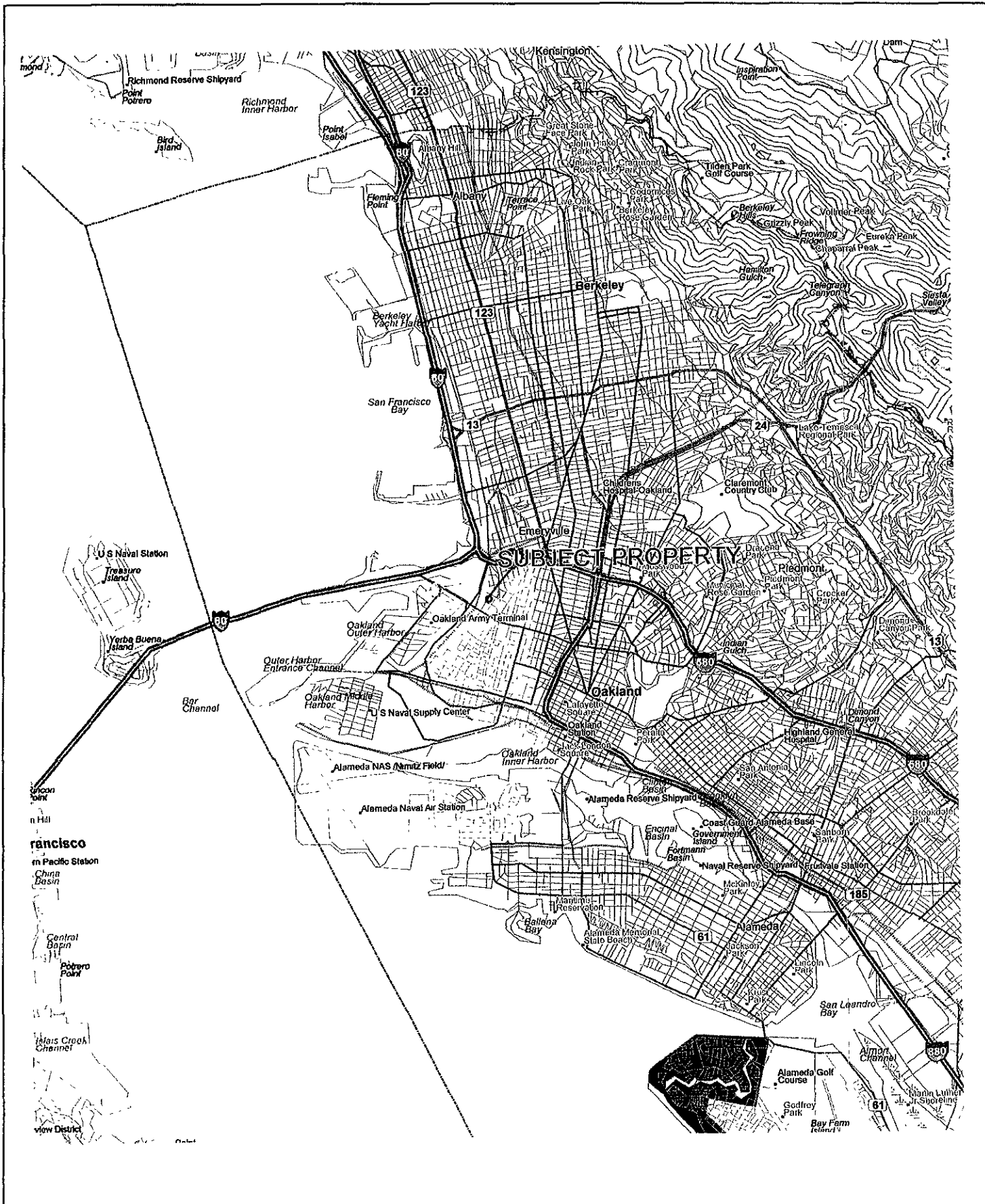
INTRODUCTION AND OBJECTIVES

The property owner is considering selling the property, and is seeking to obtain regulatory agency closure for active UFST site issues. The site formerly utilized two UFSTs—a 550-gallon diesel tank removed in 1995, and a 10,000-gallon gasoline tank removed in 2002 (removal activities were conducted by another contractor). While no formal UFST closure documentation report was prepared for either UFST removal by the firms that conducted the work, technical data were available and the appropriate regulatory agencies participated in the initial removal activities. The lead regulatory agency for UFST contamination issues is the Alameda County Environmental Health Department (ACEH).

This closure assessment is specifically designed to accomplish the following objectives:

- Organize and provide the UFST removal documentation information made available to SES in order to satisfy local regulatory agency (City of Oakland Fire Department) UFST removal permit requirements;
- Evaluate documented residual soil and/or groundwater contamination in the context of regulatory agency criteria; and
- Recommend additional work necessary to move the site toward regulatory closure, including sufficient evaluation to support a Preliminary Site Assessment (PSA) workplan.

We completed a critical review of available investigative data and documentation (from both the property owner and ACEH). No technical documentation reports were available for either of the UFST removal projects.



SITE LOCATION ON U.S.G.S. TOPOGRAPHIC MAP

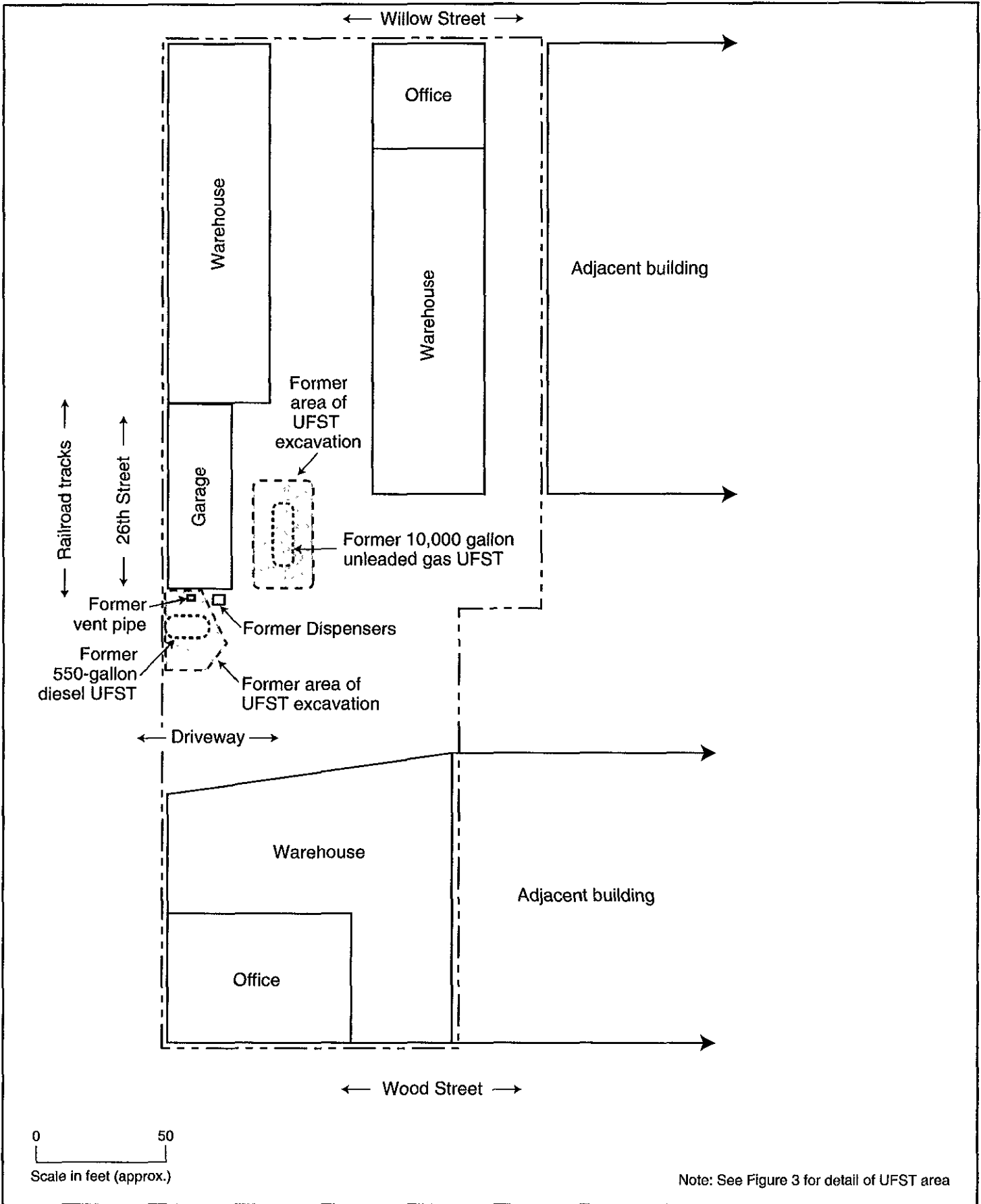
2526 Wood Street
Oakland, CA

By: MJC

JULY 2003

Figure 1

2003-96-01



Note: See Figure 3 for detail of UFST area

SITE PLAN—RUSS ELLIOTT FACILITY, INC.

2526 Wood Street
Oakland, CA

By: MJC

AUGUST 2003

Figure 2

Stellar Environmental Solutions, Inc.
Geoscience & Engineering Consulting

2003-41-02

UFST DESCRIPTIONS AND USAGE HISTORY

The two UFSTs were located on the western edge of the subject property (near 26th Street), approximately 40 feet from each other. Both UFSTs were utilized for fueling company vehicles, sharing a common dispenser island located between them. The following summarizes pertinent details of the two UFSTs. Section 2 discusses UFST removal activities and confirmation sampling.

Gasoline UFST

This UFST was installed in 1982 and removed in 2002. The UFST was cylindrical, single-walled, constructed of fiberglass. It was installed in a sand- and pea gravel-backfilled excavation slightly larger than itself. The top of the UFST had several ports/pipes typical of such UFSTs, including a fill port, turbine, dispenser piping connection, and vent pipe. The underground single-walled fiberglass dispenser piping ran from the UFST to the dispenser located directly adjacent to the UFST excavation. The UFST was not tied down to any concrete anchor slab (a.k.a. deadman), as is sometimes done when shallow groundwater is considered to present a buoyancy problem. The UFST was configured as shown in Figure 2, with the long axis oriented approximately north-south.

Diesel UFST

The diesel UFST was used from at least 1977 (it was in place when the current business moved in) to 1995 (when it was removed). There was no documentation regarding its construction specifications. Based on its size, age, and usage, this UFST was likely cylindrical, single-walled, of fiberglass or steel construction, and installed in a sand- or pea gravel-backfilled excavation slightly larger than itself. The top of the UFST likely had at least two ports/pipes (fill pipe and vent pipe). Dispenser piping (size and type unknown) ran underground approximately 25 feet from the UFST to the dispenser island. The UFST was likely not tied down to any deadman. The UFST was configured as shown in Figure 2, with the long axis oriented approximately northwest-southeast.

2.0 UFST REMOVALS AND FOLLOW-ON WORK

The following section summarizes the pre-field work planning and UFST removal activities. Each sub-section contains a separate discussion for the 2002 gasoline UFST removal and the 1995 diesel UFST removal. Note that little documentation was available to SES on the 1995 diesel UFST removal.

UNDERGROUND FUEL STORAGE TANK REMOVALS

2002 Gasoline UFST Removal

Participants

The following companies or agencies participated in the 2002 gasoline UFST removal:

- ***Bernabe & Brinker, Inc.*** (California Contractor's License No. 610617): Owner's prime contractor for the UFST removal and site restoration project.
- ***Speelman Excavation*** (California Contractor's License No. 734167; Hazardous Substances Removal Action Certification No. A7301): Bernabe & Brinker's second-tier subcontractor responsible for UFST removal.
- ***Ecology Control Industries*** (USEPA Transporter ID No. CAD982030173): UFST offsite transport.
- ***Ecology Control Industries*** (USEPA ID No. CAD009466392): UFST scrapping/decommissioning.
- ***McCampbell Analytical, Inc.*** (ELAP #1644): Soil and water sample chemical analyses.
- ***City of Oakland Fire Department, Office of Emergency Services (OFD-OES)***: Permitting agency for tank removal and initial lead agency with regard to any tank-related environmental issues.
- ***Stellar Environmental Solutions, Inc. (Berkeley, California)***: Property owner's consultant responsible for preparing this closure report.

1995 Diesel UFST Removal

Participants

The following companies or agencies participated in the 1995 diesel UFST removal:

- ***Tank Protect Engineering, Inc.*** (California Contractor's License No. 575837): Owner's prime contractor for the UFST removal and site restoration project.
- ***H&H Environmental Services*** (USEPA Transporter ID No. CAD004771168): UFST offsite transport and scrapping/decommissioning.
- ***Trace Analysis Laboratory*** (ELAP #1199): Site sample chemical analyses.
- ***Hull Development Labs, Inc.*** (ELAP #1369): Site sample chemical analyses.
- ***Alameda County Environmental Health Department (ACEH)***: Permitting agency for tank removal and lead agency with regard to any tank-related environmental issues.
- ***Stellar Environmental Solutions, Inc. (Berkeley, California)***: Property owner's consultant responsible for preparing this report.

PRE-FIELD WORK PLANNING

2002 Gasoline UFST Removal

Prior to UFST removals, appropriate permits and regulatory agency notifications were completed by Bernabe & Brinker on behalf of Russ Elliot, Inc., including:

- City of Oakland Fire Department, Office of Emergency Services: UFST removal permit application, and coordinating City of Oakland Fire Department onsite inspection of UFST removals.
- Bay Area Air Quality Management District: Regulation 8 Rule 40 Notification.

Copies of these documents are included in Appendix B.

Prior to work, Bernabe & Brinker prepared a site-specific Health and Safety Plan in accordance with State of California requirements.

1995 Diesel UFST Removal

The UFST was removed under permit from ACEH, a representative of which was present during the UST removal. There was no available documentation regarding notification to BAAQMD (although the UFST permit (closure plan) indicated that this notification would be made.

UFST AND PIPING REMOVAL AND CONFIRMATION SAMPLING

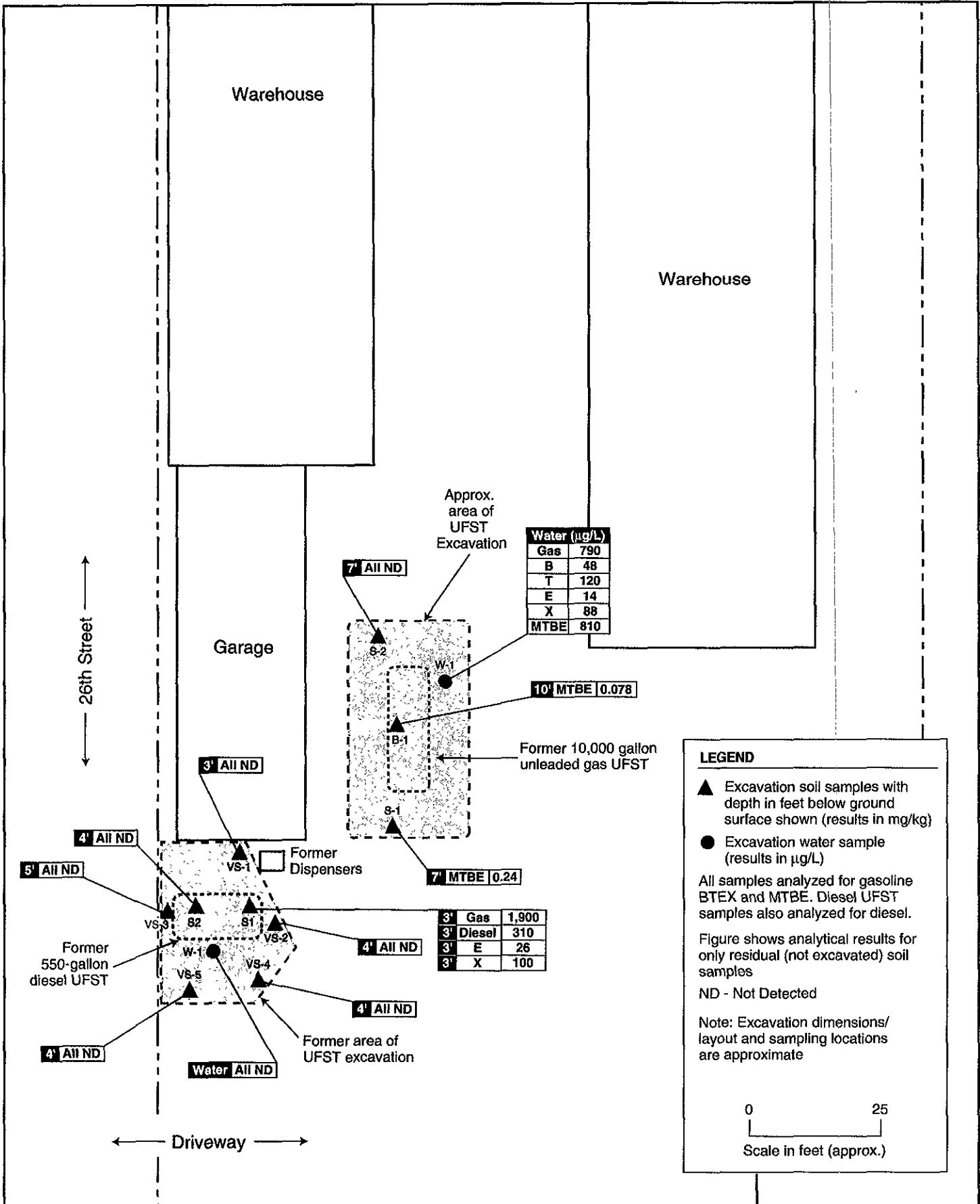
This sub-section discusses UFST removal, confirmation sampling, and remediation activities for each UFST. A subsequent section discusses waste disposal issues. Figure 3 is a detailed layout of the two UFST excavations, showing sample locations.

2002 Gasoline UFST Removal

According to a Bernabe & Brinker, Inc. April 23, 2002 invoice, approximately 78 gallons of residual gasoline was pumped from the UFST (likely prior to its removal) and placed in 55-gallon drums. On April 22, 2002, the approximately 8-inch-thick concrete surface cover over the UFST was broken up and removed. Sufficient backfill material was removed to expose the top and sides of the UFST. Approximately 400 pounds of dry ice (solid carbon dioxide) was added to the UFST, followed by 600 cubic feet of nitrogen, to render its interior atmosphere inert (non-flammable). The UFST was subsequently removed from the excavation at approximately 3:30 p.m. in the presence of Mr. Leroy Griffin of the Oakland Fire Department. The UFST appeared to be structurally sound with no obvious holes or cracks. The UFST was visually inspected by all parties. Following the visual inspection, the UFST was loaded for offsite transport and disposal (see the following section for discussion). Appendix B contains documentation of the City of Oakland Fire Department inspection of field activities.

An unspecified quantity of backfill material was removed in exposing the UFST and removing obviously contaminated soil. This material was temporarily stockpiled onsite near the UFST, underlain, and covered by plastic sheeting. One 4-point composite soil sample ("STK1A-1D") was collected for laboratory analysis for soil disposal profiling purposes.

According to a Bernabe & Brinker, Inc. invoice (dated April 23, 2002), approximately 78 gallons of residual gasoline was pumped from the UFST (likely prior to its removal) and placed in 55-gallon drums. On April 22, 2002, the approximately 8-inch-thick concrete surface cover over the UFST was broken up and removed. Sufficient backfill material was removed to expose the top and sides of the UFST. Approximately 400 pounds of dry ice (solid carbon dioxide) was added to the UFST, followed by 600 cubic feet of nitrogen, to render its interior atmosphere inert (non-flammable). The UFST was subsequently removed from the excavation at approximately 3:30 p.m. in the presence of Mr. Leroy Griffin of the Oakland Fire Department. The UFST appeared to be structurally sound with no obvious holes or cracks. The UFST was visually inspected by all parties. Following the visual inspection, the UFST was loaded for offsite transport and disposal (see the following section for discussion). Appendix B contains documentation of the City of Oakland Fire Department inspection of field activities.



DETAIL OF FORMER UFSTs SHOWING SAMPLING LOCATIONS AND ANALYTICAL RESULTS

2526 Wood Street
Oakland, CA

By: MJC

AUGUST 2003

Figure 3

Stellar Environmental Solutions, Inc.
Geoscience & Engineering Consulting

2003-41-03

An unspecified quantity of backfill material was removed in exposing the UFST and in removing obviously contaminated soil. This material was temporarily stockpiled onsite near the UFST, underlain, and covered by plastic sheeting.

UFST Excavation Confirmation Sampling

Excavation confirmation sampling was conducted immediately following the UFST removal, witnessed by Mr. Griffin. The following soil samples were collected:

- Fill end of excavation, sidewall at 8 feet (sample "S-2")
- West end of excavation, sidewall at 8 feet (sample "S-1")
- Center bottom of excavation at 10 feet (sample "B-1")
- Below the dispenser at 3.5 feet (sample "D1")

The soil samples were collected by digging into native soil with the backhoe bucket, then removing the sample and placing it in 6-inch brass sleeves with plastic caps.

Water slowly infiltrated the excavation and equilibrated at a depth of approximately 7 feet bgs. One "grab" groundwater sample (sample "W-1") was collected immediately following UFST removal.

Evidence of contamination during UFST removal included discolored soil and petroleum odor from the excavation, as noted on the City of Oakland Fire Department Field Inspection Report (see Appendix B). No sheen or free-phase petroleum product was evident on the pit water surface.

Waste Soil Disposal Sampling and Analyses

Soil sampling to characterize contaminated backfill material stockpiled onsite was conducted the same day as the UFST removal. One 4-point composite sample ("STK1A-1D") was collected from the material and analyzed for TVHg; benzene, toluene, ethylbenzene, and total xylenes (BTEX); methyl *tertiary*-butyl ether (MTBE); and total lead. The methodology for the sampling consisted of removing the upper 6 to 12 inches of soil at four locations in the pile, collecting one discrete soil sample per location, and instructing the laboratory to composite the four samples into one, before analysis.

1995 Diesel UFST Removal

The UFST was removed on July 27, 1995 in the presence of the ACEH inspector. No obvious holes were noted in the UFST. Confirmation sampling was conducted immediately following the UFST

6,116?

removal, witnessed by an ACEH inspector. Two sidewall samples (one from each of the north and south ends of the UFST) were collected (designated "S1" and "S2") at depths of 3 and 4 feet, respectively. As discussed later in this report, the sample to the south (S-1) showed contamination, while the sample to the north (S-2) did not. The ACEH inspector record indicates that no dispenser island sample was collected because the dispenser was not removed (still being used by the 10,000-gallon gasoline UFST). The UFST pit was excavated to a depth of 8 feet. The ACEH notes indicate that the intention was to have the pit fill with water, then pump it out, then sample the groundwater. The excavated soil (quantity unspecified) was stockpiled onsite for profiling (discussed later).

On October 4, 1995 a "grab" groundwater sample (designated "WS-1") was collected from the UFST pit, witnessed by an ACEH inspector. Depth to groundwater in the pit at that time was 4.5 feet. Available records indicate that the groundwater in the pit was to have been pumped out, allowed to recharge, and then a post-pumping sample taken. A pit water sample (designated "WS-1") was collected on October 4, 1994 in the presence of an ACEH inspector (no documentation available as to whether or not the pit had been pumped out).

An ACEH letter (dated January 3, 1996) requested that either: 1) documented contaminated soil in the UFST excavation be removed; or 2) a technical workplan be submitted for a Soil and Water Investigation, to address the documented contamination.

The ACEH case file indicates that additional soil removal was conducted on June 6, 1996, witnessed by an ACEH inspector. Approximately 50 to 60 cubic yards of soil was removed and stockpiled. The available information does not document the dimensions/layout of the overexcavation, although an ACEH hand-drawn figure suggests that overexcavation was conducted to the south (beyond the contaminated location S-1), to the east and to the west, but no further to the north (limited by property line). One 4-point composite soil sample (designated "STK A to D") was collected for soil disposal profiling purposes. Hydrocarbon staining and odor was evident beneath the former dispenser. Five soil samples were collected (designated "VS-1" through "VS-5"), all from the excavation sidewalls at depths of 3 to 5 feet. Sampling protocols were not documented. ACEH inspector notes indicate that the sampled material was primarily sand, with the deepest sample (5 feet) consisting of clay. As discussed later, no contamination was detected in any of the samples, suggesting that all residual above the water table had been removed.

An ACEH letter (dated February 3, 1997) indicates that the required UFST closure documentation report had not been received. Internal ACEH case file notes from 1996 indicate that ACEH was considering requiring additional work to characterize potential groundwater impacts, but that it would consider forgoing immediate assessment until the removal of the other onsite gasoline UFST.

An ACEH letter (dated April 17, 2001) requests that a groundwater sample be collected and analyzed for MTBE before considering the site for regulatory closure.

WASTE DISPOSAL AND SITE RESTORATION

2002 Gasoline UFST Removal

The one 10,000-gallon UFST and associated piping was transported offsite for scrapping on April 22, 2002. Prior to transport, a Uniform Hazardous Waste manifest was completed, and then signed by Mr. Tom Seidman (of Russ Elliot, Inc.). The hazardous waste generator I.D. number assigned by the State of California to Russ Elliot, Inc. for this UFST removal was CAC002366167. The UFST was transported offsite by Ecology Control Industries (EPA Transporter I.D. No. CAD982030173). The U.S. Department of Transportation proper shipping name and hazard class assigned to the UFST on the manifest were "Waste Empty Storage Tank" and "Non-RCRA Hazardous Waste Solid," respectively. The State of California waste code assigned to the UFST was "512" (for containers larger than 30 gallons). A copy of the hazardous waste manifest is included in Appendix C.

No documentation was available to SES regarding the fate of the 78 gallons of residual fuel. The site UFST Closure Plan submitted to the City of Oakland Fire Department indicated that residual UFST liquids would be transported and disposed of by ECI (a licensed hazardous waste liquid hauler and treatment facility). A Bernabe & Brinker invoice indicates that the disposal task was conducted, but no documentation by way of manifests or disposal certificates were provided.

SES was provided no documentation regarding the ultimate disposal of the contaminated soil that was excavated and stockpiled by Bernabe & Brinker before they backfilled the excavation with clean fill material. We reviewed a letter from Bernabe & Brinker, Inc. to the property owner (dated April 16, 2002) proposing a unit price to transport and dispose of an unspecified quantity of contaminated soil; this letter suggests that such activities were carried out. Because the excavation was backfilled with clean imported fill on the same day, it is apparent that the excavated soil was not reused in the excavation but disposed of offsite. *no!* *where?*

As stated above, according to Bernabe & Brinker, Inc., the excavation was backfilled on the same day as the UFST removal. The backfill consisted of clean, imported fill material (Class 2 base rock material provided by EBI Aggregates of Oakland, California). Backfill material was emplaced in approximately 1-foot lifts, and each lift was compacted with a vibratory plate attachment on the excavator.

1995 Diesel UFST Removal

The one 550-gallon UFST (and associated piping) was transported offsite on July 27, 1995 (the same day as its removal) by H&H Environmental. According to ACEH records, a Uniform Hazardous Waste manifest (No. 95208560) was completed for legal transport of the UFST (no copy of the manifest was available to SES).

There are several UFST removal subcontractor and ACEH references to onsite treatment of the excavated, stockpiled soil (quantity unspecified). The soil was reportedly treated with hydrogen peroxide spraying of the stockpile and spreading (for aeration). A contractor invoice (dated May 1997) indicates that contaminated soil (quantity unspecified) was profiled and disposed of at a landfill (unspecified).

According to ACEH records (and corroborated by an invoice from the UFST removal contractor), the excavation was backfilled with clean imported fill in July 1996.

3.0 ANALYTICAL RESULTS, REGULATORY CONSIDERATIONS, AND CONTAMINANT CONCEPTUAL MODEL

RESULTS OF LABORATORY ANALYSES

For both UFST removals, project soil and groundwater samples were submitted under chain-of-custody control to California-certified (ELAP) hazardous waste analytical laboratories. Based on available documentation, it appears that samples were analyzed in accordance with the City of Oakland Fire Department-approved UFST closure plans. The following presents the lab results for each of the two UFST removals.

Soil and groundwater samples from the UFST removals were analyzed for the following (not all analyses were conducted for both UFST removal samples):

- Total petroleum hydrocarbons, gasoline (TPHg) and diesel (TPHd) ranges, by Environmental Protection Agency (EPA) Method 8015;
- BTEX and MTBE, by EPA Method 8020; and
- Total lead, by EPA Method 6010B (the pit water sample was analyzed for dissolved lead, after filtration).

For both projects, laboratory quality control samples (e.g., method blanks, matrix spikes, surrogate spikes, etc.) were analyzed by the laboratory in accordance with requirements of each analytical method. All laboratory QC sample results and sample holding times were within the acceptance limits of the methods (Appendix D). Appendix D contains the available analytical laboratory reports and chain-of-custody records. The following presents the analytical results for each of the UFST removal projects.

2002 Gasoline UFST Removal

Table 1 summarizes the analytical results for the 2002 gasoline UFST removal activities. The only contaminant detected in residual (excavation sidewall or dispenser base) or stockpiled soil samples

Table 1
April 2002 Gasoline UFST Removal Sampling Analytical Results
2526 Wood Street, Oakland, California

Sample I.D.	Sample Depth (feet)	TPHg	TPHd	Benzene	Toluene	Ethyl benzene	Total Xylenes	MTBE	Total Lead
Excavation Confirmation Soil Samples (concentrations in mg/kg)									
S-1 (west sidewall)	7'	<1.0	NA	<0.005	<0.005	<0.005	<0.005	0.24	8.5
S-2 (east sidewall)	7'	<1.0	NA	<0.005	<0.005	<0.005	<0.005	<0.05	<3.0
B-1 (UFST base)	10'	<1.0	NA	<0.005	<0.005	<0.005	<0.005	0.078	3.1
D-1 (below dispenser)	3.5'	<1.0	NA	<0.005	<0.005	<0.005	<0.005	<0.05	11
Soil ESLs ^(a)		100	—	0.045	2.6	2.5	1.0	0.028	750
Stockpiled Soil Sample (concentrations in mg/kg)									
STK 1A-1D	—	<1.0	NA	<0.005	<0.005	<0.005	<0.005	0.15	9.9
Pit Water Sample (concentration in µg/L)									
W-1	7'	790	NA	48	120	14	88	810	ND ^(c)
Groundwater ESLs ^(b)		100	—	1.0	40	30	13	5.0	3.2

Notes:

^(a) Applicable to subsurface soils (<10 feet deep) at sites where groundwater is a potential drinking water source.

^(b) Applicable to sites where a potential drinking water source is threatened.

^(c) Not Detected – method reporting limit not specified in lab report.

ESLs = Regional Water Quality Control Board, San Francisco Bay Region "Environmental Screening Levels" for commercial/industrial sites.

TPHg = Total petroleum hydrocarbons- gasoline range.

TPHd = Total petroleum hydrocarbons- diesel range.

was MTBE. The maximum MTBE concentration was 0.24 mg/kg in one of the excavation sidewall samples. Lead was at background concentrations (11 mg/kg or less).

Gasoline, BTEX, and MTBE were all detected in the pit water sample at elevated concentrations. Dissolved lead was not detected in that water sample.

The available data suggest an historical leak in the UFST and/or piping. While MTBE was detected in two of the four confirmation soil samples, the absence of gasoline and BTEX soil contamination (and detected contamination in the stockpile sample) indicates that the majority of residual soil contamination was removed; however, groundwater was impacted before soil corrective action was implemented.

1995 Diesel UFST Removal

Table 2 summarizes the analytical results for the 1995 through 1996 diesel UFST removal activities. Elevated concentrations (above current regulatory agency screening levels) of gasoline, diesel, ethylbenzene, and xylenes were detected in the south sidewall sample. Following over-excavation, there was no residual soil contamination detected at this location (including MTBE). No contamination was detected in the October 1995 pit water sample.

The available data suggest an historical leak in the UFST and/or piping. The absence of contamination in the overexcavation (final) confirmation samples suggests that all unsaturated zone soil contamination was removed, and the absence of concurrent groundwater contamination suggests that groundwater had not been impacted by the release. However, MTBE analysis was not conducted and will likely be required to obtain regulatory closure.

REGULATORY STATUS

The UFSTs have been under regulatory oversight through permitting and other mechanisms. The 1995 removal of the diesel UFST established the regulatory record of ACEH oversight of the site as a UFST-related site; therefore, the discussion of the diesel UFST below precedes the 2002 gasoline UFST removal.

Diesel UFST

When the diesel UFST was removed in 1995, the ACEH was the lead regulatory agency for UFST removal permitting, onsite inspection, and directing the collection of UFST-related soil/groundwater samples, as well as the agency responsible for continuing regulatory oversight of petroleum contamination cases. We have reviewed all available information at ACEH for that diesel UFST removal.

The ACEH considers the 1995 diesel UFST case an active fuel leak case (ACEH case No. 4073), and the ACEH file contains full documentation of UFST closure and subsequent investigations and corrective actions (with the exception of a comprehensive documentation report). A 1996 ACEH internal note (available in the case file) indicated ACEH's intention to request an additional groundwater sample associated with the 1995 diesel UFST removal, to be pursued by ACEH in conjunction with future removal of the onsite 10,000-gallon UFST (at that time, the 10,000-gallon UFST was anticipated to be removed in 1998). The latest information in the file was a 2001 ACEH letter requesting analysis of a groundwater sample for MTBE. As discussed previously, the water sampling task was conducted in April 2002.

Table 2
1995-1996 Diesel UFST Removal Sampling Analytical Results
2526 Wood Street, Oakland, California

Sample I.D.	Sample Depth (feet)	TPHg	TPHd	Benzene	Toluene	Ethyl benzene	Total Xylenes	MTBE	Total Lead
July 1995 Excavation Confirmation Soil Samples (concentrations in mg/kg)									
S-1 (south sidewall)	3	1,900	310	26	<1.4	26	100	NA	NA
S-2 (north sidewall)	4	<0.5	<1	<0.005	<0.005	<0.005	0.0054	NA	NA
June 1996 Excavation Confirmation Soil Samples (concentrations in mg/kg)									
VS-1	3	<1	<1	<0.005	<0.005	<0.005	<0.005	<0.05	NA
VS-2	4	<1	<1	<0.005	<0.005	<0.005	<0.005	<0.05	NA
VS-3	5	<1	<1	<0.005	<0.005	<0.005	<0.005	<0.05	NA
VS-4	4	<1	<1	<0.005	<0.005	<0.005	<0.005	<0.05	NA
VS-5	4	<1	<1	<0.005	<0.005	<0.005	<0.005	<0.05	NA
Soil ESLs ^(a)		100	100	0.045	2.6	2.5	1.0	0.028	—
July 1995 Stockpiled Soil Sample (concentrations in mg/kg)									
SP1 (A-D) ^(b)	—	960	340	<0.005	<0.005	<0.005	<0.015	NA	NA
June 1996 Stockpiled Soil Sample (concentrations in mg/kg)									
STK (A-D)	—	340	<25	0.80	1.2	0.71	<0.005	<0.05	NA
October 1995 Pit Water Sample (concentration in µg/L)									
W-1	4.5	<50	<50	<0.5	<0.5	<0.5	<0.5	NA	NA
Groundwater ESLs ^(c)		100	100	1.0	40	30	13	5.0	—

Notes

^(a) Applicable to subsurface soils (<10 feet deep) at sites where groundwater is a potential drinking water source.

^(b) 4-point composite sample.

^(c) Applicable to sites where a potential drinking water source is threatened.

ESLs = Regional Water Quality Control Board, San Francisco Bay Region "Environmental Screening Levels" for commercial/industrial sites.

TPHg = Total petroleum hydrocarbons- gasoline range.

TPHd = Total petroleum hydrocarbons- diesel range

NA = Sample not analyzed for this constituent.

The site is listed in the RWQCB's GeoTracker database of reported releases from petroleum USTs (RWQCB case No. 01-2294). Based on the date of the database entry (1995), that case citation is likely for the 1995 removal of the diesel UFST rather than the gasoline UFST.

Gasoline UFST

When the gasoline UFST was removed in 2002, the City of Oakland Fire Department, Office of Emergency Services (OFD-OES) had become the lead agency for permitting and overseeing the removal of UFSTs. While we did not review the OFD-OES file for the gasoline UFST removal, we infer that it would only contain the UFST Closure Plan, permit, and technical data (sampling results), which we were provided by the property owner. It is OFD-OES policy that, when UFST-sourced residual soil and/or groundwater contamination is discovered, the case is transferred to the ACEH. The ACEH is a Local Oversight Program (LOP) to the RWQCB, which has ultimate decision-making authority regarding contamination issues affecting groundwater.

There was no information available at the ACEH regarding the 10,000-gallon gasoline UFST, other than 1996-1997 references in internal case tracking notes regarding its presence and likely future removal. This is likely because the previous lead agency for the UFST removal, the City of Oakland Fire Department, has not yet transferred the case to ACEH because the Fire Department has not yet received a closure documentation report. The property owner provided SES with documentation and technical data on UFST removal and subsequent investigation/corrective actions, which reportedly have not been used previously to prepare a closure documentation report.

The site is listed in the RWQCB's GeoTracker database of reported releases from petroleum USTs (RWQCB case No. 01-2294). Based on the date of the database entry (1995), that case citation is likely for the 1995 removal of the diesel UFST rather than the gasoline UFST. It is unlikely that ACEH or the RWQCB would create a separate fuel leak case number for the recent gasoline UFST removal. Rather, the two sub-sites would be addressed together in a comprehensive investigation.

State of California UST Cleanup Fund Status

Costs incurred in contaminant investigation (or remediation conducted after the UFSTs were removed) are potentially reimbursable from the State of California Underground Storage Tank Cleanup Fund (Fund). That process requires the submission of an application to determine eligibility, followed by formal requests for reimbursement. To our knowledge, there has been no communication with the Fund regarding this site.

REGULATORY CONSIDERATIONS REGARDING RESIDUAL CONTAMINATION

There are no published soil cleanup standards for MTBE, the only detected contaminant in residual soils. The RWQCB evaluates soil contamination in the context of potential impacts to groundwater and other sensitive receptors (such as surface water) on a case-specific basis. While the RWQCB adheres to the State of California's policy of non-degradation of groundwater specified in the Porter

Cologne Water Quality Act, it recognizes that some degradation is unlikely to be irreversible, and therefore will grant case closures where it can be demonstrated that no public health or ecological risks will occur as a result of the residual contamination.

The RWQCB has historically utilized a Designated Level Methodology (DLM) as a guide in determining if a waste at a given site poses unacceptable impacts, and if so, what cleanup level is needed. The DLM calculations are site-specific and consider the depth to groundwater, type of soil, total pollutant load, amount of rainfall, and attenuation factors. Relevant criteria for soil contamination by the regulatory environment for TPH contamination are generally evaluated on a case-by-case basis, most often using some form of the RWQCB's DLM discussed above. The LUFT manual uses the DLM approach which is recommended to evaluate the likelihood of impacts to groundwater from contaminated soil.

More recently, the RWQCB (San Francisco Bay Region) published "Environmental Screening Levels" (ESLs). The ESLs are conservative screening-level concentrations for soil and groundwater that incorporate both environmental and human health risk considerations, and are used as a preliminary guide in determining whether additional remediation and/or investigation are warranted. The ESLs are not cleanup goals, although in most cases contaminant concentrations less than ESLs result in "no further action" status being granted by the RWQCB. Likewise, contamination in excess of ESLs does not necessarily mean that additional work is required, only that site-specific data may need to be incorporated into the risk decision process. The only documented residual soil contamination above current ESLs is MTBE (detected at the gasoline UFST location at 0.24 mg/kg, 1 order of magnitude above the 0.028 mg/kg ESL).

LITHOLOGY AND GROUNDWATER HYDROLOGY

Native soil evident in the gasoline UFST excavation sidewalls was predominantly low permeability, fine-grained clay/silt, and in the diesel UFST excavation was sand with some clay. In the 1995 and 2002 UFST removal excavations, groundwater infiltrated the diesel UFST excavation and equilibrated at depths of approximately 5 feet and 7 feet, respectively. The regional groundwater flow direction in the area is likely to the west (following topography, toward San Francisco Bay), although groundwater flow direction may vary locally based on lithology. A quarterly groundwater monitoring report (dated May 2002) for a vicinity site (Pacific Supply Company, 1735 24th Street, located approximately two blocks away) available at ACDEH indicates that groundwater flow is to the northwest.

RESIDUAL CONTAMINATION AND POTENTIAL MIGRATION

Gasoline UFST

No gasoline or BTEX were detected in residual site soils in any of the confirmation soil samples collected. MTBE was present in two of the three UFST excavation soil samples, with a maximum concentration approximately 1 order of magnitude above the ESL. The presence of gasoline, BTEX, and MTBE contamination in the pit-water sample confirm that groundwater has been impacted by the former UFST release. While there is no apparent residual soil contamination by gasoline or BTEX, residual MTBE in soils in contact with high groundwater could result in continued desorption from soil into groundwater. Dissolved contamination in groundwater likely migrates primarily by advection in the direction of groundwater flow, likely to the west. The lateral extent of the groundwater contamination is likely limited by the low-permeability soils, the inferred slight hydraulic gradient, and the low groundwater contaminant concentrations. In the apparent absence of a continuing contaminant source, it is likely that the residual groundwater contamination will naturally attenuate given sufficient distance and/or time. The limited data available are insufficient for an evaluation of the extent of groundwater contamination, or the stability of contaminant concentrations (i.e., determining whether the “plume” stable or reducing).

Diesel UFST

Elevated levels of gasoline, diesel, ethylbenzene, and xylenes were initially detected beneath the diesel UFST in 1995; however, subsequent overexcavation and confirmation sampling suggest that residual soil contamination was removed. No fuel contamination was detected in a “grab” groundwater sample from that excavation. The available data suggest no residual impacts associated with the gasoline UFST. The source of the gasoline-related contamination is either: 1) historical, undocumented usage and release of gasoline from that UFST; or 2) migration of contamination from the nearby gasoline UFST that was removed later. The latter scenario is less likely given that the diesel UFST excavation confirmation samples located between the diesel and the gasoline UFSTs contained no gasoline contamination.

GROUNDWATER IMPACTS AND BENEFICIAL USES

In general, impacts of contamination on the environment by fuel contaminants are evaluated on a case-by-case basis, with consideration given to drinking water standards when appropriate. Because no water-bearing zone or aquifer in this area is in use for drinking or other types of water use, application of the drinking water standard does not appear to be appropriate. However, for consideration of the ESLs, the RWQCB generally rules by the assumption that site groundwater is a known or potential source of drinking water, unless a site-specific variance is granted. The likelihood of groundwater impacts to beneficial use in this area appears to be negligible.

4.0 SUMMARY, CONCLUSIONS, OPINION, AND RECOMMENDATIONS

SUMMARY AND CONCLUSIONS

The summary and conclusions presented in this section are based wholly on the data delineated in the body of this report.

- One 550-gallon diesel UFST and one 10,000-gallon gasoline UFST were removed from the facility in 1995 and 2002, respectively. The UFSTs were located approximately 50 feet apart. All UFST removal and confirmation sampling activities were conducted in accordance with local agency requirements, and both UFST removal excavations have been backfilled and resurfaced. Contaminated soil removed from the excavations was ultimately transported offsite for disposal.
- While petroleum contamination was initially detected beneath the diesel UFST in 1995, subsequent over-excavation appears to have removed all residual soil contamination. No groundwater contamination was detected in a concurrent pit water sample. No UFST closure documentation report was submitted, and the case is considered by the lead agency (Alameda County Environmental Health Department) to be an active fuel leak case. The available data suggest that no further investigation associated with this release is warranted.
- At the nearby 2002 gasoline UFST removal excavation, only MTBE was detected in residual soil samples above regulatory agency screening level criteria. A pit water sample contained gasoline, BTEX, and MTBE above regulatory agency screening level criteria. There was no information in ACEH files regarding this UFST closure, and no UFST closure documentation report has been submitted to the City of Oakland Fire Department (which permitted the UFST removal).
- Residual MTBE soil contamination at the gasoline UFST location is in contact with and/or just above shallow groundwater, which has been encountered between 5 and 7 feet deep. Native soils have been described as clays, silts, and sand.
- The available data suggest that the majority of contaminated soil has been removed, but residual groundwater contamination remains. Groundwater impacts can be confirmed and general magnitude/extent determined by conducting a Preliminary Site Assessment (PSA),

which would entail advancing temporary soil boreholes in the immediate vicinity of the former UFST and collecting soil and/or “grab” groundwater samples for laboratory analysis. It is likely that regulatory agencies will require such confirmation prior to considering the case for regulatory closure. At your request, we are submitting concurrently with this report a technical workplan for a PSA. These documents have also been submitted to the City of Oakland Fire Department to satisfy any remaining UFST-related permit requirements.

OPINION AND RECOMMENDATIONS

- The available data suggest that further investigation of the diesel UFST case is not warranted, although the proposed PSA for the gasoline UFST will also provide data supporting the absence of impacts at the diesel UFST location.
- We recommend contacting the City of Oakland Fire Department to confirm its receipt of these reports, and to formally request its concurrence that no further action is needed with regard to agency requirements.
- We recommend following up with ACEH to confirm its receipt of these reports, and to discuss the timeframe for its approval of the PSA workplan.

5.0 LIMITATIONS

This report has been prepared for the exclusive use of the property owners, Russ Elliott, Inc., their authorized representatives, and the regulators. No reliance on this report shall be made by anyone other than the client and regulators for whom it was prepared.

The findings and conclusions presented in this report are based wholly on documentation provided to SES by the property owner and property owner's contractors conducting the work, and from Alameda County Health Department case files. SES did not participate in the planning or implementation of the discussed field activities. This report provides neither a certification nor guarantee that the property is free of hazardous substance contamination. This report has been prepared in accordance with generally accepted methodologies and standards of practice of the area. The SES personnel who prepared this report are qualified to conduct such work, and have accurately reported the information available but cannot attest to the validity of that information. No warranty, expressed or implied, is made as to the findings, conclusions, and recommendations included in the report.

The findings of this report are valid as of the date of this report. Site conditions may change with the passage of time, natural processes, or human intervention, which can invalidate the findings and conclusions presented in this report. As such, this report should be considered a reflection of the current site conditions as based on the investigation and remediation completed.

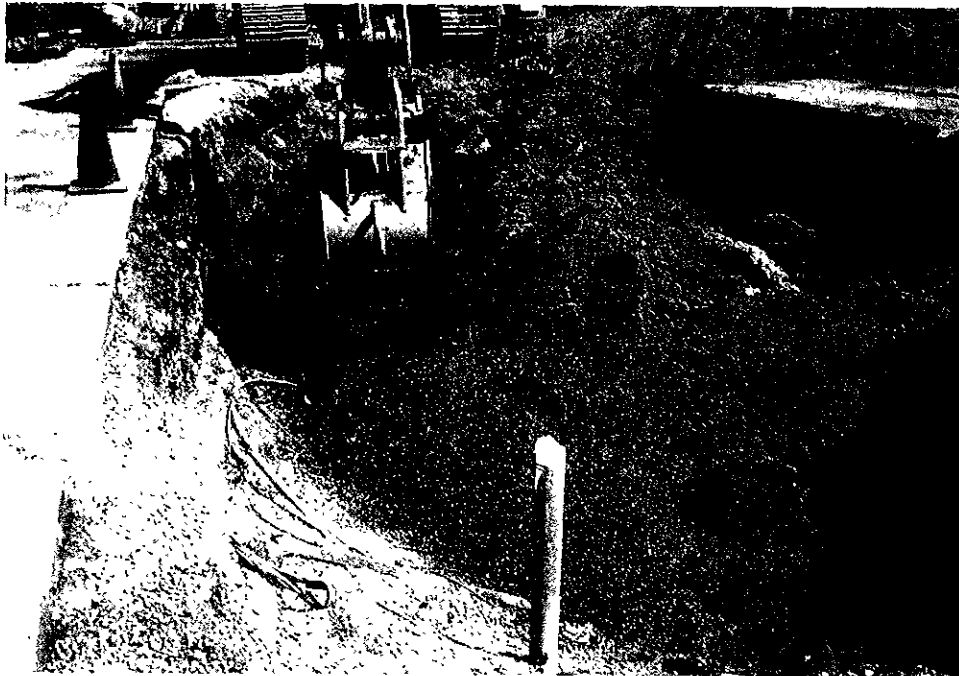


Subject: Breaking concrete cover over UFST.

Site: Russ Elliott, Inc. 2526 Wood Street, Oakland, Alameda County, California

Date: April 22, 2002

Photo No.: 01

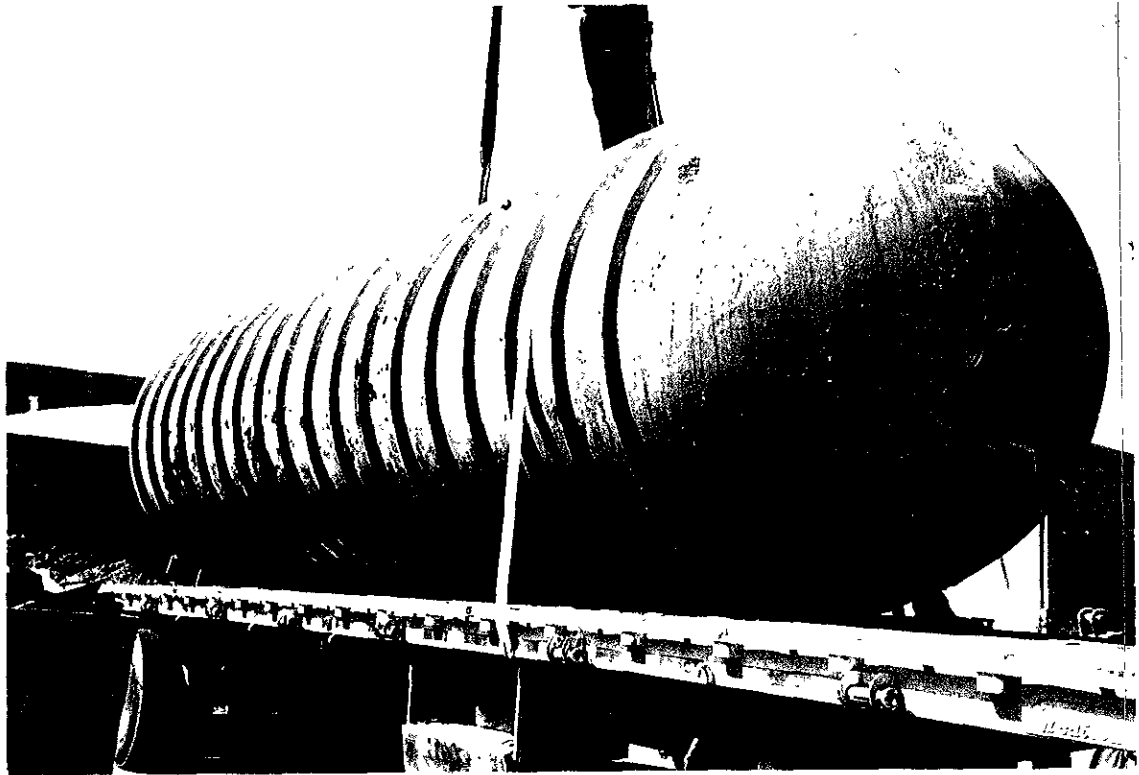


Subject: Removing original UFST excavation backfill.

Site: Russ Elliott, Inc. 2526 Wood Street, Oakland, Alameda County, California

Date: April 22, 2002

Photo No.: 02



Subject: Loading UFST for offsite transport.

Site: Russ Elliott, Inc. 2526 Wood Street, Oakland, Alameda County, California

Date: April 22, 2002

Photo No.: 03



Subject: Compacting backfilled UFST excavation.

Site: Russ Elliott, Inc. 2526 Wood Street, Oakland, Alameda County, California

Date: April 22, 2002

Photo No.: 04



Subject: Former excavation after backfilling and compaction.

Site: Russ Elliott, Inc. 2526 Wood Street, Oakland, Alameda County, California

Date: April 22, 2002

Photo No.: 05

1995-1996 Diesel UFST Removal

Site Summary STID 4073
Russ Elliott
2526 Wood St.
Oakland CA 94607

- 7/27/95 Removal of 550-gal diesel UST. Strong HC odors, stained soil. See field report. No visible holes in UST.
- 8/9/95 Reviewed faxed results; **up to 340 ppm Tphd (SP), and 310 ppm TPHd in pit (S1). 960 ppm TPHg (SP) and 1,900 ppm TPHg in pit (S1). ND benzene in SP and 2.6 ppm benzene in pit (S1).** spoke w/TPE. We still have to take a pit water sample. Is there a sheen or FP on gw? Louis will try to get out to site this week. Sampling should be next week. They want to purge it first.
- 8/10/95 Site visit. GW in pit, but no sheen
- 8/16/95 Im Louis
- 8/18/95 Im Louis re gw sample
- 10/4/95 Call to TPE (from DK?). Need schedule date for sampling. 10/5.
Site visit by DK. See field report. Water sample taken from pit. No sheen.
- 12/11/95 Results? JE phoned TPE: spoke w/Lee Huckins. He will look and fax.
- 12/12/95 Received/reviewed fax. Water results are all ND for TPHg, TPHd, and BTEX. **Did they backfill the pit? Phoned TPE**: spoke w/Louis: pit was NOT backfilled. Phoned Cathy Wolton at Russ Elliott: 763-1300 (Louis gave me her name as his contact.) Told her my strong suggestion to overex the pit, or define the extent of soil contam w/SBs. She thought TPE was going to submit a plan to us. She will contact them, then get back to me. Told her I'd wait 3 wks, and if I don't hear from her, I will write a letter to RP Tom Seidman.
- 1/3/96 **Wrote letter**
- 1/22/96 mess fm Louis: wants to overex tomorrow pm. Mess to Louis: 1/23 is no good; how about 1/24?
- 2/6/96 phoned TPE: spoke w/Lee Huckins. Louis is out sick. He will check status and get back to me. Told him to contact Tom Peacock while I'm out: 2/9 thru 2/23.

3/11/96 phoned TPE: spoke w/Lee Huckins. Been waiting for good weather. Rained out. Don't know if it's scheduled.

3/15/96 spoke w/Lee Huckins: he's waiting for better weather. Told him I'd be gone bet 3/22 and 3/26. OK

3/29/96 I got a complaint form from Kevin Tinsley

phoned Kathy Walton of Russ Elliott: She said they (Southern Pacific) were dumping (not digging) a lot of soil next to them. Across Wood St. There were a lot of fumes. She also called SP, but they knew nothing. They are where the new freeway is going. Now have piles of soil w/plastic on top. It smelled like HC (gasoline). No longer is a nuisance, for the most part. But there may be some that's not covered. She will call back if there is another problem. Also gave her AQMD's complaint number: 800-334-6367 or 415-749-4900.

Re THEIR site, they have been waiting for good weather to continue the digging. Is the pit still open?

5/17/96 Phoned Russ Elliott; spoke w/Kathy Wolton: She never heard from Louis. Is he ok? Last thing she heard he was going in for surgery for tonsils. I told her it's her responsibility to obtain a contractor; if one contractor is not responding, it's her responsibility to find another. Told her I don't want to have to write her a NOV. She'll find a contractor and get back to me.

5/23/96 Louis phoned: Do overex on 5/30. We'll sample both ends, since we're confused w/the samples.

5/30/96 spoke w/Louis: **He cancelled the field work**; backhoe broke down. He concurs that S1 is near dispenser island, and S2 is near the street. They have to temporarily remove the dispenser island to do overex. So that it doesn't fall into the pit and create more contam. They're only gonna break half the dispenser island. It's about 8' long. If contam continues beyond dispenser, they will replace dispenser anyway and probably do borings to delineate it. They're breaking dispenser island. Scheduled it for 6/6 Thursday; Mark Varney will be onsite.

6/6/96 Site visit for overex of 550-gal diesel UST pit.

7/11/96 Site visit (brief); noted that they were in the process of paving over the 550-gal diesel UST pit. phoned Lee Huckins and left message: I did not receive results fm 6/6/96 sampling. Mess fm Lee: 5:24 pm: he hopes I got results; he just faxed them. Doing soil aeration starting 7/12 8 am.

7/12/96 Brief site visit. Met Louis Travis onsite. Spraying hydrogen peroxide and water onto the soil pile, then will spread soil out. It had TPHd and Tphg. The pit has been closed (finally).

Reviewed 7/11 fax fm TPE: Tank pit is completely ND for TPHg, TPHd, and BTEX. The stockpile has 340 ppm TPHg, ND TPHd, 0.80 ppm benzene, some TE, and ND xylenes.

10/17/96 phoned TPE: spoke w/Jeff. (Louis is out). They haven't issued report yet because client hasn't paid fully. They just pay weekly, in increments.

WROTE LETTER--did not send it.

Discussed w/ALL: Assuming existing 10K diesel UST needs to be removed by 98, we can hold off on asking for more work until then. It would be nice to get another gw sample, but we will likely encounter gw in that other UST pit, esp bec that UST is buried deeper. As long as RP doesn't push for closure for the 500 gal UST (removed in 7/95), we can put this one on hold until the 10K UST comes out and we get gw sample ("gw invest.").

Lm for Pam: can she check the UST file and tell me if that 10K UST needs to be removed by 98? I looked, but the file is checked out to her.

10/21/96 mess fm KT: he thinks he issued permit after they removed waste oil UST. Thinks the 10K UST is single walled bec he asked them to do SIR. He doesn't have the file. Lm for KT: Is he 100% SURE that the 10K UST is single walled? Did he look through his desk for the file? Or does he just think it is not there?

1/31/97 Found UST file. Lm Kevin T: write a joint letter? Upgrade or close UST?

2/3/97 **REVISED AND SENT LETTER.**

9/29/97 Steve Bittman of International Geologic phoned (530-8751). He is doing a SI (!) And wants to know status. Lm for Steve: does he have my latest letter, dated 2/3/97? No progress since then.

10-3 fax

10-15 l m S. Bittman

10-21 l m " "

10-28 " "

He finished a report. back
bet 11-10 + 11-14. 3

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 510/271-4320

ACCEPTED

Underground Storage Tank Closure Permit
 Alameda County Health Care Services Agency
 80 Swan Way, Room 200
 Oakland, CA 94621
 Telephone: (510) 271-4320

These closure/removal plans have been reviewed and found to be acceptable and will comply with the requirements of State and Local Health Laws. Changes to your plans must be approved by this Department prior to construction. The project proposed herein is subject to the requirements of any required building permits for structural modifications. One copy of the accepted plans must be on file on the job site available to all contractors and craftsmen involved with the project. Any change in plan or location of the tank must be submitted to this Department and to the Building Inspector's Department to determine if such changes meet the requirements of State and local laws.

Notify this Department at least 72 hours prior to the following required inspections:

- Removal of Tank(s) and Piping
- Sampling
- Final Inspection

Issuance of a permit to proceed to permanent site closure is dependent on compliance with accepted plans and all applicable laws and regulations.

ATTENTION: PERMITS ARE NOT VALID WITHOUT INSPECTIONS

Control Specialist

J. Berke 5-16-95

UNDERGROUND TANK CLOSURE PLAN

*** Complete according to attached instructions ***

1. Business Name RUSS ELLIOTT, INC.
 Business Owner RUSS ELLIOTT, INC.
 2. Site Address 2526 WOOD STREET
 City OAKLAND Zip 94607 Phone (510) 763-1300
 3. Mailing Address 2526 WOOD STREET
 City OAKLAND Zip 94607 Phone (510) 763-1300
 4. Land Owner RUSS ELLIOTT, INC.
 Address 2526 WOOD ST. City, State OAKLAND, CA zip 94607
 5. Generator name under which tank will be manifested RUSS ELLIOTT, INC.
- EPA I.D. No. under which tank will be manifested CAC000728952

Tom Seidman 763-1300 l.f.
 3 partners
 Craig Elliott
 Russ Elliott CEO
 Attn: Tom Seidman

6. Contractor TANK PROTECT ENGINEERING OF NORTHERN CA., INC.
Address 2821 WHIPPLE ROAD
City UNION CITY, CA 94587 Phone (510)429-8088
License Type* A-HAZ ID# 575837

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant TANK PROTECT ENGINEERING OF NORTHERN CA., INC.
Address 2821 WHIPPLE ROAD
City UNION CITY Phone (510)429-8088

8. Contact Person for Investigation
Name THOMAS C. SEIDMAN Title VICE PRESIDENT
Phone (510)763-1300

9. Number of tanks being closed under this plan 1
Length of piping being removed under this plan _____
Total number of tanks at facility 2

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

** Underground tanks are hazardous waste and must be handled **
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter

Name N/A EPA I.D. No. _____
Hauler License No. _____ License Exp. Date _____
Address _____
City _____ State _____ Zip _____

b) Product/Residual Sludge/Rinsate Disposal Site

Name N/A EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank and Piping Transporter

Name H H ENVIRONMENTAL SERVICES EPA I.D. No. CAD00A771168
Hauler License No. 0334 License Exp. Date 1/31/96
Address 220 CHINA BASIN
city SAN FRANCISCO State CA zip 94107

d) Tank and Piping Disposal Site

Name H H SHIPYARD EPA I.D. No. CAD00A771168
Address 220 CHINA BASIN
city SAN FRANCISCO State CA zip 94107

11. Experienced Sample Collector

Name MARK VARNEY
Company TANK PROTECT ENGINEERING OF NORTHERN CA., INC.
Address 2821 WHIPPLE ROAD
city UNION CITY State CA zip 94587 Phone (510)429-8088

12. Laboratory

Name TRACE ANALYSIS LABORATORY
Address 3423 INVESTMENT BLVD
city HAYWARD state CA zip 94545
State Certification No. 1199

13. Have tanks or pipes leaked in the past? Yes [] No

If yes, describe. _____

14. Describe methods to be used for rendering tank inert

15 1,000

USE 25 LBS. OF DRY ICE PER EACH 1,000-GALLON CAPACITY
FOR EACH TANK. VERIFY WITH ONSITE LEL METER. *ok*

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
500 GALLON	DIESEL UST was onsite in ~1977 when Russ Elliott moved in.	SOIL	ONE SAMPLE AT THE FILL OR PUMP END OF THE TANK, MAX. 2 FT. BELOW TANK PIT IN NATIVE SOIL <i>ok</i>
	PIPING	SOIL	ONE SAMPLE EVERY 20 LINEAL FEET, OR UNDER SWING JOINT DISPENSER. <i>ok</i>
IF WATER	PRESENT IN TANK PIT	WATER	ONE SAMPLE FROM WALL NEXT TO TANK END AT SOIL/WATER INTERFACE. <i>ok</i>

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan
4 CYDS.	ONE SAMPLE FOR EVERY 20 CUBIC YARDS FOR REUSE, MAXIMUM OR 1 SAMPLE EVERY 50 CUBIC YARDS MINIMUM FOR DISPOSAL

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
DIESEL TPHD BTEX	EPA 3550 ✓ EPA 5030.	GCFID ✓ 8020/8240 ✓	1 PPM .005 PPM
IF GROUNDWATER ENCOUNTERED:			
	TPHD 3510 / ECFID ✓ BTEX 5030 / 602 OR 624 ✓		

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer STATE COMPENSATION INSURANCE FUND

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) JEFF FARHODMAND

Signature Jeff Farhodmand

Date 4/27/95

Signature of Site Owner or Operator

Name (please type) THOMAS C. SEIDMAN

Signature Tom Seidman

Date 5-2-95

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name Russ Elliott Today's Date 7/27/95
Site Address 2526 Wood St.
City Oakland Zip 94607 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?
Inspection Categories:
 I. Haz. Mat/Waste GENERATOR/TRANSPORTER
 II. Hazardous Materials Business Plan, Acutely Hazardous Materials
 III. Under ground Storage Tanks

Removal of 550-gal diesel UST.

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

12:15 arrived onsite. Strong HC odor.
Comments: Louis of TPE onsite. OFD not present 0% LEL, 0%
12:24 Removal of UST: tar wrapped, no visible holes.
UST transported by H+H (manifest #95208560).
12:27 Cathy from Russ Elliott Co. onsite at tank removal
Depth to tank invert is ~5' bgs. GW is entering pit at ~5' bgs, as seen on sidewall. Took 2 wall samples on N + S ends (see attached map). Analyze soil+gw for TPH, BTEX + TPHg. We suspect gasoline (by the odor). No dispenser sample bec. it's nested next to another dispenser that's being used w/the 10K UST (diesel).
1:10 Louis excavated the pit to 8' bgs. We'll let gw recharge, pump it out, recharge again + then sample gw.
Louis said the initial soil removed from over + around UST appeared contaminated, so he'll composite it w/the soil from below UST, which is obviously dirty. Please notify me when you sample gw.
1:32 left site

Contact Tank Protect Eng.
Title Civil Engineer / Project Eng.
Signature [Signature]
Louis Travis III

Inspector Jennifer Eberle
Signature [Signature]

II, III

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

white -env.health
yellow -facility
pink -files

II, III

Site ID # 4073 Site Name RUSS ELLIOTT Today's Date 10/4/95

Site Address 2526 WOOD ST

City OAKLAND Zip 94607 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

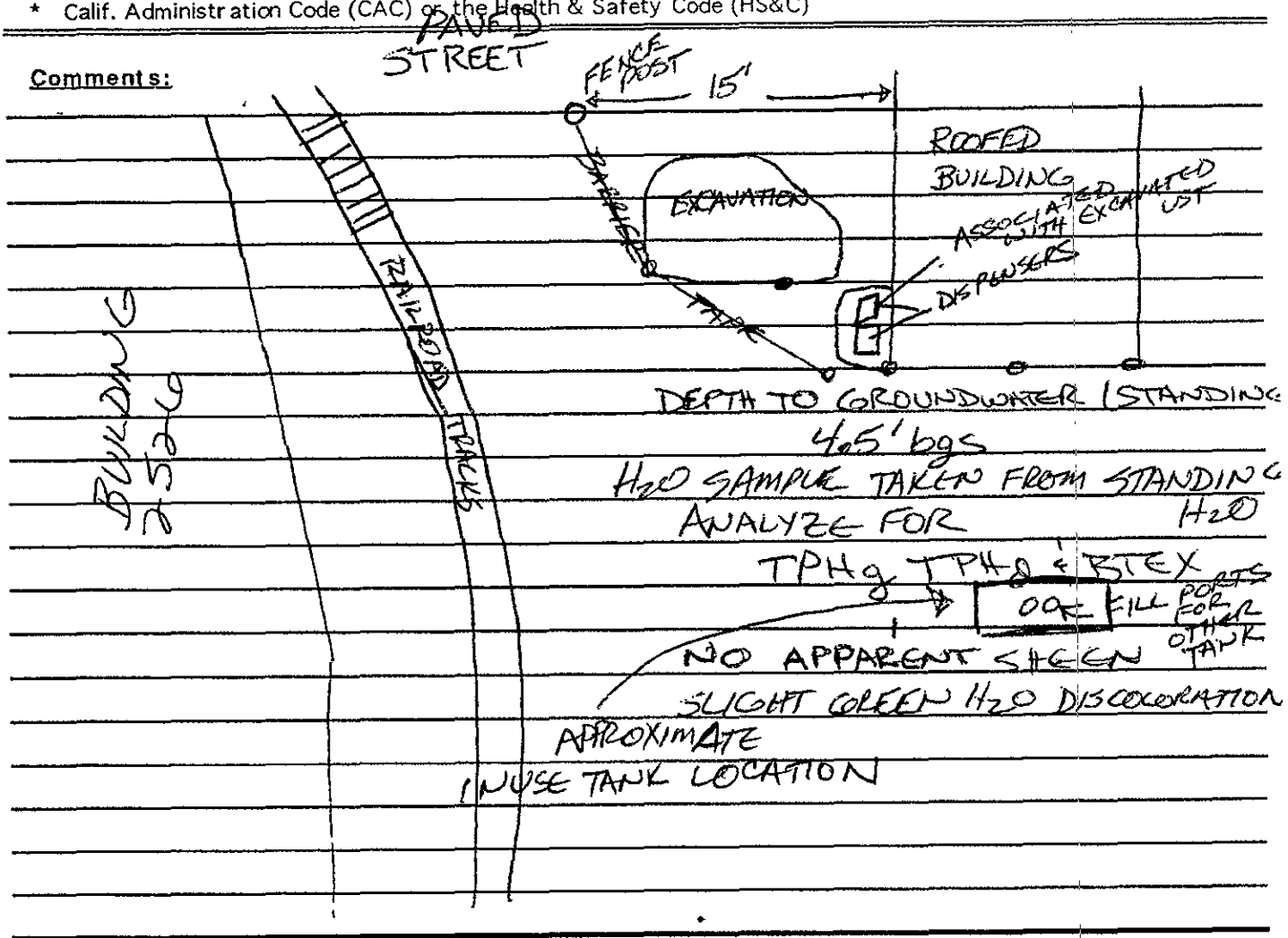
Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Hazardous Materials Business Plan, Acutely Hazardous Materials
- III. Under ground Storage Tanks

LEFT OFFICE 12:10
ON-SITE 12:30
LEAVE SITE 1:15

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:



Contact Louis Truitt III
 Title Project Engineer
 Signature [Signature]

Inspector DALE KLETTE
 Signature [Signature]

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KILMER, Agency Director

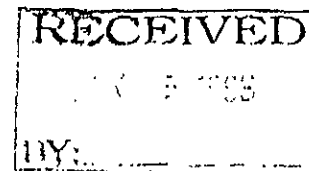
January 3, 1996
STID 4073

Attn: Tom Seidman
Russ Elliott Inc.
2526 Wood St.
Oakland CA 94607

RE: Russ Elliott Inc., 2526 Wood St., Oakland CA 94607

RAFAEL A. SHARRO Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #110
Alameda, CA 94602 (510)
(510) 567-6700



Dear Mr. Seidman,

A 550-gallon underground storage tank (UST) last containing diesel fuel was removed from this site on 7/27/95. I was present during the tank removal. Soils were sampled from the excavation. Maximum concentrations reported were 310 parts per million (ppm) Total Petroleum Hydrocarbons (TPH) as diesel and 2.6 ppm benzene, and 1,900 ppm TPH as gasoline in the excavation (sample S-1). The stockpiled soils were also sampled and found to contain 340 ppm TPH as diesel, Non-Detect (ND) benzene, and 960 ppm TPH as gasoline. *Unfortunately, there is some confusion as to the location of sample S-1. My field notes indicate S-1 was the sample away from 25th St. (with the railroad tracks), but Tank Protect Engineering's (TPE's) site map indicate S-1 was closer to 25th St.*

Dale Klettke of this office was present onsite during the sampling of the (ground)water in the excavation on 10/4/95. His notes indicate there was "no apparent sheen" on the water. I received the lab results for this sampling on 12/12/95 via fax from TPE. Results indicated ND for TPH-gasoline, TPH-diesel, and BTEX.

Due to the elevated concentrations of contaminants at this site, you are requested to submit a workplan within 45 days, or by February 18, 1996, for a Soil and Water Investigation (SWI), as per Sect. 2724 of Chapter 16, Division 3, Title 23, California Code of Regulations. Rapid site assessment methods (i.e. cone penetrometer testing, geoprobe, hydropunch, etc.) are suggested to qualitatively assess impacts and to define the extent of the contaminant plume, as a first step of the SWI. Since there is a potential for migration of soil contaminants to shallow groundwater, a groundwater investigation should be included. You may choose to overexcavate the tank excavation to the limits of soil contamination and resample, instead of installing soil borings to define the extent of the soil contamination. However, this may take several attempts of overexcavating and resampling. If you choose to do this, a formal SWI workplan is not required.

January 3, 1996
STID 4073
Attn: Tom Seidman
page 2 of 2


There are state funds available for remediation of UST sites. These funds reimburse responsible parties, such as yourselves, for the costs associated with remediation. I have enclosed a brochure outlining this program. Included are phone numbers for people to help you with this process. Please note that the UST CleanUp Fund specifies bidding requirements and deductibles. **Please direct questions re the Fund to Christopher Stevens (916-227-4519) or Jim Munch (916-227-4430) of the State Water Resources Control Board, UST CleanUp Fund.**

If you have any other types of questions, please contact me at 510-567-6761.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Louis Travis, Tank Protect Engineering, 2821 Whipple Rd., Union City CA 94587
 Acting Chief/file

je.4073

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Pkwy
 Alameda CA 94502
 510/567-6700

Hazardous Materials Inspection Form

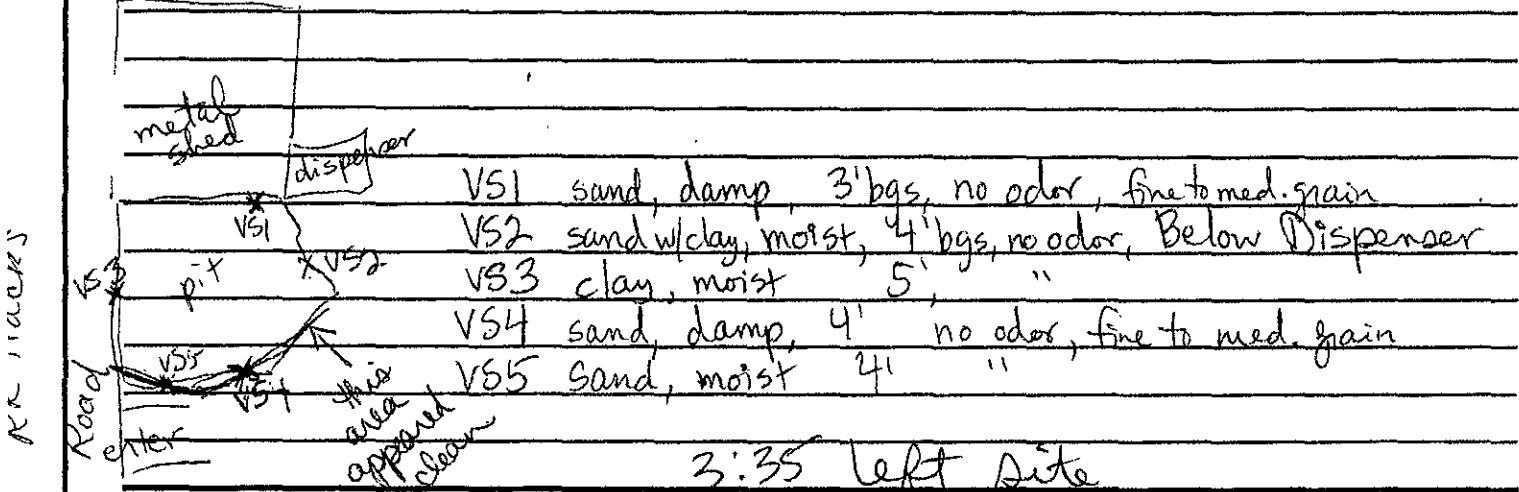
II, III

Site ID # _____ Site Name Russ Elliott Today's Date 6/6/96
 Site Address 2526 Wood St
 City Oak Zip 94607 Phone _____

_____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.? overex of 550-gal diesel UST pit
Inspection Categories:
 _____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
 _____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
 _____ III. Under ground Storage Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

2:05 arrived onsite
Comments: Met Lee Huckins of TPE - Pit has been excavated; ~50-60 yd³ soil removed - Lee said the soil below dispenser had a HC odor. GW is entering pit ~4-5' bgs. Pit should be stabilized w/pea gravel to prevent cave in, asap. Analyze the 5 soil samples for TPHd, TPHg, & BTEX. Lee will take a sample of stockpile also. A small area appears to have brown diesel "sheen" on the water entering pit.



Contact Lee Huckins
 Title Geologist
 Signature Lee Huckins

Inspector Jennifer Eberle
 Signature Jennifer Eberle

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 3, 1997
STID 4073
page 1 of 2

Attn: Tom Seidman
Russ Elliott Inc.
2526 Wood St.
Oakland CA 94607

RE: Russ Elliott Inc., 2526 Wood St., Oakland CA 94607

Dear Mr. Seidman,

Since my last letter to you, dated 1/3/96, the underground storage tank (UST) pit was overexcavated on 6/6/96, in my presence. Verification soil samples were collected. On 7/11/96, the laboratory report was faxed to me. Results indicate non-detectable (ND) concentrations of the contaminants sought (TPH-diesel, TPH-gasoline, and BTEX) for all 5 verification soil samples. An additional soil sample was collected from the stockpiled soil (four point composite). Results included ND TPHd, 340 ppm TPHg, and 0.80 ppm benzene.

A final report of these activities has not been received in this office. The "Underground Tank Closure Plan," which both Tank Protect and yourself signed on page 6, specifies that you shall "submit a closure report to this office within 60 days of the tank removal" (page 6). The UST was removed on July 27, 1995. The report was therefore due by September 27, 1995. This project has taken an unusually long time. *The report is long overdue. Please submit the tank removal report immediately.* This report should contain all of the information listed in item #22 of the instructions (copy attached). **This case shall remain open until your reporting requirements have been met.**

I believe our mutual goal is the closure of this case, at which point a closure letter will be issued from this office, and signed by the Director of this Department. As you probably know, the closure letter is usually paramount in importance when doing a property transfer or refinancing a property loan.

If you have any questions, please contact me at 510-567-6761.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

10-3-97

Post-It™ brand fax transmittal memo 7671		# of pages ▶	2
To	Steve Bittman	From	J. Eberle
Co.		Co.	
Dept.	I was out	Phone #	on 10-1 + 10-2
Fax #	Sorry it took	Fax #	so long

February 3, 1997
STID 4073
page 2 of 2
Attn: Tom Seidman

cc: Jeff Fahrhoomand, Tank Protect Engineering, 2821 Whipple Rd., Union City CA 94587
J. Eberle/file

je.4073-A
attachment

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 17, 2001
StID # 4073

Mr. Thomas Seidman c/o
Russ Elliot, Inc.
2526 Wood St.
Oakland CA 94607

Re: Request for MTBE Analysis in Groundwater at 2526 Wood St., Oakland CA 94607

Dear Mr. Seidman:

Please be advised that prior to closure of the above referenced site's investigation of the former 500 gallon underground tank, you will be required to analyze a groundwater sample for the analyte, methyl tertiary butyl ether (MTBE) per State Water Resources Control Board guidelines. This sample should be taken in a location within the former tank pit or down-gradient of the former diesel/gasoline tank. Alternatively, should existing analytical data exist where the analytical laboratory can determine the presence of MTBE (ie a MTBE standard was run during the BTEX analysis even though MTBE was not reported), this can be done in lieu of additional analysis. Please provide a work plan or analytical lab interpretation for MTBE quantification as soon as possible.

You are also advised that I am the new contact for the oversight of this project. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Handwritten signature of Barney M. Chan in cursive.

Barney M. Chan
Hazardous Materials Specialist

✓ C: B. Chan, files

MTBErq2526Wood

2002 Gasoline UFST Removal

CITY OF OAKLAND
FIRE PREVENTION BUREAU
250 Frank Ogawa Plaza, Ste. 3341
OAKLAND, CALIFORNIA 94612-2032
(510) 238-3851

APPLICATION for PERMIT to INSTALL, REMOVE or REPAIR TANKS
In the CITY OF OAKLAND

Request Submittal Date: _____

CIRCLE APPROPRIATE ACTIONS: Application is hereby made for permit to:

(a) Install (e) Repair (d) Modify (e) Abandon/Close in Place **A**

(a) Fuel oil (e) Diesel (d) _____ tank(s) and excavate, commencing:

(a) inside the curb line*; (b) inside the property line; (c) aboveground; (d) underground tank(s)
*Curb line, please attach copy of sidewalk/excavation permit from PLANNING AND BUILDING

_____ side of _____ St./Ave. _____ feet _____ of _____ St./Ave.

Address: 2526 Wood Street Present storage Unleaded

Jan Elliot Address 2526 Wood Street Phone 510 223-2805

Bernabe & Brinker, Inc. Address 2240 Wood Street Phone 510-451-3482

Surface to be disturbed Number of Tanks 1 Capacity 10 000 Gallons ea.

Inside the property

Jan Elliot

ATTACH/SUBMIT: (All applicants must have a City Business License Permit)

- (1) Copies of Closure Plans for underground tank removal(s)
- (2) Sets of plans and (1) copy of specifications for above ground tank removal
- (2) Sets of plans and (2) sets of application packets for underground tank installation/modifications
- (2) Sets of plans for aboveground tank installation and specifications
- copy or prepare to show Planning and Building approval for aboveground tank removal and tank repair

FOR TANK INSTALLATION PLEASE SUBMIT THIS APPLICATION FORM ALONG WITH A
APPLICATION FOR PERMIT TO OPERATE, MAINTAIN OR STORE

FOR OFFICE USE ONLY



17-02
Electrical Inspection

Amt. Recv'd \$540
Ck# 4939
Receipt# 834510

Date Issued: _____

Cash _____
Recv'd by: DF
FILE TR

Contact 238-7759 NO LATER
48 hrs to conduct removal.

UNDERGROUND STORAGE TANKS - FACILITY

(one page per site) Page ____ of ____

1. NEW SITE PERMIT
 3. RENEWAL PERMIT
 5. CHANGE OF INFORMATION
 7. PERMANENTLY CLOSED SITE
 4. AMENDED PERMIT
 specify change local use only _____
 8. TANK REMOVED
 6. TEMPORARY SITE CLOSURE

I. FACILITY / SITE INFORMATION

(name as FACILITY NAME or DBA - Doing Business As) 3 FACILITY ID# _____
 LOT ROOFING _____
 STREET 26th Street 401 FACILITY OWNER TYPE
 1. CORPORATION 4. LOCAL AGENCY/DISTRICT*
 2. INDIVIDUAL 5. COUNTY AGENCY*
 3. PARTNERSHIP 6. STATE AGENCY*
 7. FEDERAL AGENCY* 402
 GAS STATION 3. FARM 5. COMMERCIAL
 DISTRIBUTOR 4. PROCESSOR 6. OTHER 403
 NO. OF TANKS _____
 SITE _____
 Is facility on Indian Reservation or
 Husbands? 404 Yes No 405
 *If owner of UST is a public agency: name of supervisor of division, section or office which
 operates the UST (This is the contact person for the tank records.)

II. PROPERTY OWNER INFORMATION

OWNER NAME 407 Jan Elliot PHONE 510-223-2805
 STREET ADDRESS 2526 Wood Street
 CITY 410 STATE CA 411 ZIP CODE 94607 412
 OWNER TYPE 1. CORPORATION 2. INDIVIDUAL 4. LOCAL AGENCY / DISTRICT 6. STATE AGENCY
 3. PARTNERSHIP 5. COUNTY AGENCY 7. FEDERAL AGENCY 413

III. TANK OWNER INFORMATION

NAME 414 Jan Elliot PHONE 510-223-2805
 STREET ADDRESS 2526 Wood Street
 CITY 417 STATE CA 418 ZIP CODE 94607
 TYPE 1. CORPORATION 2. INDIVIDUAL 4. LOCAL AGENCY / DISTRICT 6. STATE AGENCY
 3. PARTNERSHIP 5. COUNTY AGENCY 7. FEDERAL AGENCY 420

IV. BOARD OF EQUALIZATION UST STORAGE FEE ACCOUNT NUMBER

44- 0 0 0 2 0 0 Call (916) 322-9669 if questions arise 44

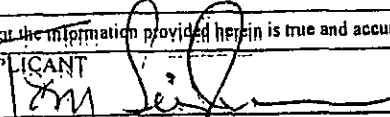
V. PETROLEUM UST FINANCIAL RESPONSIBILITY

METHOD(S) 1. SELF-INSURED 4. SURETY BOND 7. STATE FUND 10. LOCAL GOVT MECHANISM
 2. GUARANTEE 5. LETTER OF CREDIT 8. STATE FUND & CFO LETTER 99. OTHER: _____
 3. INSURANCE 6. EXEMPTION 9. STATE FUND & CD 47

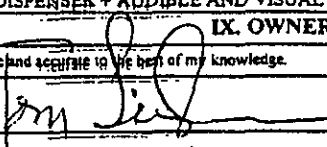
VI. LEGAL NOTIFICATION AND MAILING ADDRESS

Indicate which address should be used for legal notifications and mailing.
 and mailings will be sent to the tank owner unless box 1 or 2 is checked.
 1. FACILITY 2. PROPERTY OWNER 3. TANK OWNER 46

VII. APPLICANT SIGNATURE

I certify the information provided herein is true and accurate to the best of my knowledge.
 APPLICANT  DATE 12/7/01 424 PHONE 510-223-2805
 APPLICANT (PRINT) Jan Elliot 425 TITLE OF APPLICANT Property Owner
 FACILITY NUMBER (For local use only) 423 1998 UPGRADE CERTIFICATE NUMBER (For local use only)

UNDERGROUND STORAGE TANKS - TANK PAGE 2

VI. PIPING CONSTRUCTION (Check all that apply)				Page <u> </u> of <u> </u>
UNDERGROUND PIPING		ABOVEGROUND PIPING		
<input type="checkbox"/> 1. PRESSURE <input type="checkbox"/> 2. SUCTION <input type="checkbox"/> 3. GRAVITY	<input type="checkbox"/> 458 <input type="checkbox"/> 460 <input type="checkbox"/> 461	<input type="checkbox"/> 1. PRESSURE <input type="checkbox"/> 2. SUCTION <input type="checkbox"/> 3. GRAVITY	<input type="checkbox"/> 459 <input type="checkbox"/> 462 <input type="checkbox"/> 463	
<input type="checkbox"/> 4. SINGLE WALL <input type="checkbox"/> 5. LINED TRENCH <input type="checkbox"/> 99. OTHER	<input type="checkbox"/> 460 <input type="checkbox"/> 461	<input type="checkbox"/> 1. SINGLE WALL <input type="checkbox"/> 2. DOUBLE WALL <input type="checkbox"/> 95. UNKNOWN <input type="checkbox"/> 99. OTHER	<input type="checkbox"/> 462 <input type="checkbox"/> 463	
<input type="checkbox"/> 6. FRP COMPATIBLE W/100% METHANOL <input type="checkbox"/> 7. GALVANIZED STEEL <input type="checkbox"/> 8. FLEXIBLE (HDPE) <input type="checkbox"/> 9. CATHODIC PROTECTION	<input type="checkbox"/> Unknown <input type="checkbox"/> 99. Other <input type="checkbox"/> 464	<input type="checkbox"/> 1. BARE STEEL <input type="checkbox"/> 2. STAINLESS STEEL <input type="checkbox"/> 3. PLASTIC COMPATIBLE W/ CONTENTS <input type="checkbox"/> 4. FIBERGLASS <input type="checkbox"/> 5. STEEL W/COATING	<input type="checkbox"/> 6. FRP COMPATIBLE W/100% METHANOL <input type="checkbox"/> 7. GALVANIZED STEEL <input type="checkbox"/> 8. FLEXIBLE (HDPE) <input type="checkbox"/> 9. CATHODIC PROTECTION <input type="checkbox"/> 99. OTHER <input type="checkbox"/> 95. UNKNOWN	<input type="checkbox"/> 464 <input type="checkbox"/> 465
VII. PIPING LEAK DETECTION (Check all that apply) (A description of the monitoring program shall be submitted to the local agency.)				
UNDERGROUND PIPING		ABOVEGROUND PIPING		
SINGLE WALL PIPING		SINGLE WALL PIPING		
(Check all that apply): <input type="checkbox"/> 1. LEAK DETECTOR 3.0 GPH TEST WITH AUTO PUMP SHUT OFF FOR LEAK, SYSTEM FAILURE, AND SYSTEM DISCONNECTION + AUDIBLE AND VISUAL ALARMS. <input type="checkbox"/> 2. ANNUAL INTEGRITY TEST (0.1 GPH) <input type="checkbox"/> 3. DAILY VISUAL CHECK <input type="checkbox"/> 4. MONITORING OF PUMPING SYSTEM + TRIENNIAL PIPING INTEGRITY TEST (0.1 GPH) ALARMS (NO VALUES IN BELOW GROUND PIPING): <input type="checkbox"/> 5. ANNUAL INTEGRITY TEST (0.1 GPH)		(Check all that apply): <input type="checkbox"/> 1. ELECTRONIC LINE LEAK DETECTOR 3.0 GPH TEST WITH AUTO PUMP SHUT OFF FOR LEAK, SYSTEM FAILURE, AND SYSTEM DISCONNECTION + AUDIBLE AND VISUAL ALARMS. <input type="checkbox"/> 2. MONTHLY 0.2 GPH TEST <input type="checkbox"/> 3. ANNUAL INTEGRITY TEST (0.1 GPH) <input type="checkbox"/> 4. DAILY VISUAL CHECK CONVENTIONAL SUCTION SYSTEMS (Check all that apply): <input type="checkbox"/> 5. DAILY VISUAL MONITORING OF PIPING AND PUMPING SYSTEM <input type="checkbox"/> 6. TRIENNIAL INTEGRITY TEST (0.1 GPH) SAFE SUCTION SYSTEMS (NO VALVES IN BELOW GROUND PIPING): <input type="checkbox"/> 7. SELF MONITORING GRAVITY FLOW (Check all that apply): <input type="checkbox"/> 8. DAILY VISUAL MONITORING <input type="checkbox"/> 9. BIENNIAL INTEGRITY TEST (0.1 GPH)		
SECONDARILY CONTAINED PIPING		SECONDARILY CONTAINED PIPING		
(Check all that apply): <input type="checkbox"/> 1. CONTINUOUS SUMP SENSOR WITH AUDIBLE AND VISUAL ALARMS AND (Check one) <input type="checkbox"/> a. AUTO PUMP SHUT OFF WHEN A LEAK OCCURS <input type="checkbox"/> b. AUTO PUMP SHUT OFF FOR LEAKS, SYSTEM FAILURE AND SYSTEM DISCONNECTION <input type="checkbox"/> c. NO AUTO PUMP SHUT OFF <input type="checkbox"/> 2. ANNUAL INTEGRITY TEST (0.1 GPH) <input type="checkbox"/> 3. DAILY VISUAL CHECK <input type="checkbox"/> 4. MONITORING OF PUMPING SYSTEM + TRIENNIAL PIPING INTEGRITY TEST (0.1 GPH) ALARMS (NO VALUES IN BELOW GROUND PIPING): <input type="checkbox"/> 5. ANNUAL INTEGRITY TEST (0.1 GPH)		(Check all that apply): <input type="checkbox"/> 10. CONTINUOUS TURBINE SUMP SENSOR WITH AUDIBLE AND VISUAL ALARMS AND (Check one) <input type="checkbox"/> a. AUTO PUMP SHUT OFF WHEN A LEAK OCCURS <input type="checkbox"/> b. AUTO PUMP SHUT OFF FOR LEAKS, SYSTEM FAILURE AND SYSTEM DISCONNECTION <input type="checkbox"/> c. NO AUTO PUMP SHUT OFF <input type="checkbox"/> 11. AUTOMATIC LEAK DETECTOR <input type="checkbox"/> 12. ANNUAL INTEGRITY TEST (0.1 GPH) SUCTION/GRAVITY SYSTEM <input type="checkbox"/> 13. CONTINUOUS SUMP SENSOR + AUDIBLE AND VISUAL ALARMS EMERGENCY GENERATORS ONLY (Check all that apply) <input type="checkbox"/> 14. CONTINUOUS SUMP SENSOR WITHOUT AUTO PUMP SHUT OFF + AUDIBLE AND VISUAL ALARMS <input type="checkbox"/> 15. AUTOMATIC LINE LEAK DETECTOR (3.0 GPH TEST) <input type="checkbox"/> 16. ANNUAL INTEGRITY TEST (0.1 GPH) <input type="checkbox"/> 17. DAILY VISUAL CHECK		
VIII. DISPENSER CONTAINMENT				
<input type="checkbox"/> 1. FLOAT MECHANISM THAT SHUTS OFF SHEAR VALVE <input type="checkbox"/> 2. CONTINUOUS DISPENSER PAN SENSOR + AUDIBLE AND VISUAL ALARMS <input type="checkbox"/> 3. CONTINUOUS DISPENSER PAN SENSOR WITH AUTO SHUT OFF FOR DISPENSER + AUDIBLE AND VISUAL ALARMS	<input type="checkbox"/> 4. DAILY VISUAL CHECK <input type="checkbox"/> 5. TRENCH LINER / MONITORING <input type="checkbox"/> 6. NONE			
IX. OWNER/OPERATOR SIGNATURE				
Provided herein is true and accurate to the best of my knowledge.				
OWNER/OPERATOR 	DATE 12/7/01			
OPERATOR (print) Ben Seidman	TITLE OF OWNER/OPERATOR VP			
Permit Approved (For local use only)	Permit Expiration Date (For local use only)			

CITY OF OAKLAND
Fire Department
Fire Prevention Bureau
Hazardous Materials Program
250 Frank H. Ogawa Plaza, Ste. 3341
Oakland, CA 94612-2032

UNDERGROUND TANK CLOSURE PLAN
(Complete according to instructions)

- 1) Name of Business RUSS ELLIOT INC.
Business Owner or Contact Person (PRINT) THOMAS C. SEIDMAN
- 2) Site Address 2526 Wood Street
City Oakland Zip 94607 Phone 510-763-1300
- 3) Mailing Address 1744 Skyview Drive
City San Leandro Zip 94577 Phone 510-351-3338
- 4) Property Owner Jeannette Elliot
Business Name (if applicable) Russ Elliot Inc.
Address 1744 Skyview Drive
City, State San Leandro Zip 94577
- 5) Generator name under which tank will be manifested
Jeannette Elliot
- EPA ID Under which tank will be manifested CAC 002366167

PE
3/21/82

6) Contractor Bernabe and Brinker Inc.
Address 2240 Wood Street
City Oakland, CA 94607-1713 Phone 510-451-3482
License Type A - HAZ IDS 610617

Effective January 1, 1992, Business and Professional Code Section 7058.7 require contractors to also hold Hazardous Waste certification issued by the State Contractor License Board

7) Consultant (if applicable) none
Address _____
City, State _____ Phone _____

8) Main Contact Person for Investigation (if applicable)
Name Thomas C. Seidman Title Vice President
Company Russ Elliot Inc.
Phone 510-763-1300

9) Number of underground tanks being closed with this plan 1 (Confirmed with owner operator)

10) State Registered Hazardous Waste Transporters/Facilities (see instructions)

****Underground storage tanks must be handled as hazardous waste ****

a) Product/Residual Sludge/Rinsate Transporter
Name ECI EPA I.D. NO. CAD982030173
Hauler License No. 1533 License Exp. Date 3/13/03
Address 255 Parr Blvd
City Richmond State CA Zip 94801

b) Product/Residual Sludge/Rinsate Disposal Site
Name ECI EPA ID No. CAD009466392
Address 255 Parr Blvd.
City Richmond State CA Zip 94801

c) Tank and Piping Transporter

Name ECI EPA I.D. No. CAD082030173

c) Hauler License No. 1533 License Exp. Date 3/13/03

Address 255 Parr Blvd.

City Richmond State CA Zip 94801

d) Tank and Piping Disposal Site

Name ECI EPA I.D. No. CAD009466392

Address 255 Parr Blvd.,

City Richmond State CA Zip 94801

11) Sample Collector

Name CAL COAST Analytical Laboratory Technician

Company Calcoast Analytical Laboratory

Address 472 Watt Street

City Emeryville State CA Zip 94608

Phone 510-

12) Laboratory

Name Calcoast Laboratory

Address 472 Watt Street

City Emeryville State CA Zip 94608

State Certification No. 2421

13) Have tanks or pipes leaked in the past Yes No Unknown

If yes, describe _____

14) Describe methods to be used for rendering tank (s): inert:

CO2, dry ice at 30 lbs per 1000 gallons.

Before tanks are pumped out and inserted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be permanently plugged.

The Bay Area Air Quality Management District, 415/771-6000 must also be contacted for tank removal permit. The use of a combustible gas indicator to verify tank inertness is required. It is the contractor's responsibility to bring a working combustible gas indicator on-site to verify that the tank is inert. **Note: you may be required to recalibrate the combustible gas indicator on site, to show that it is working properly.**

15) Tank History and Sampling Information *** (see instructions) ***

Tank		Material to be sampled (tank contents, soil, groundwater)	Location and Depth of Samples
Capacity	Use History include date last used (estimated)		
10,000	unleaded 12-23-98	Soil Ground water	2 feet below UST per Fire Inspector

One soil sample must be collected for every 20 linear feet or piping that is removed. A ground water sample must be collected if any ground water is present in the excavation.

EXCAVATED/STOCKPILED SOIL

Stockpiled Soil volume (estimated)	Sampling Plan

Stockpiled soil must be placed on beamed plastic and must be completely covered by plastic sheeting

Will the excavated soil be returned to the excavation immediately after tank removal?

yes
 No
 unknown

If yes, explain reasoning _____

If unknown at this point in time, please be aware that excavated soil may no be returned to the excavation without prior approval from Fire Services Agency, Office of Emergency Services. This means that the contractor, consultant, or responsible party must communicate with the Hazardous Materials Inspector **IN ADVANCE** of backfilling operations.

16. Chemical methods and associated detection limits to be used for analyzing samples:

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed.
See attached Table 2.

17. Submit Site Health and Safety Plan (see Instructions)

Contaminant Sought	EPA or Other Sample Preparation Method Number	EPA or Other Analysis Method Number	Method Detection Limit
TPH GAS			
BTEX			
MTBE			

- 18. Submit Workers Compensation Certificate copy
 Name of Insurer State Compensation Insurance Fund (Policy No. 1305773)
- 19. Submit Plot Plan ***** (Be Instructions) *****
- 20. Enclose Permit fee (See Instructions)
- 21. Report any leaks or contamination to this office within 5 days of discovery.
 The written report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report, (ULR) form.
- 22. Submit a closure report to this office within 60 days of the tank removal. The report must contain all information listed in item 22 of the instructions.
- 23. Submit State (Underground storage Tank Permit Application) Forms A and B (one B form for each UST to be removed) (mark box 8 for tank removed in the upper right hand corner)

I declare that to, the best of my knowledge and belief that the statements and information provided above are correct and true.

I understand that information, in addition to that proved above, may be needed in order to obtain approval from the Hazardous Materials Division and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA. (Occupational Safety and health Administration) requirements concerning; personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his age and that this responsibility is not shared nor assumed by the City of Oakland.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Inspector at least three working days in advance of site-work, to schedule the required inspections.

CONTRACTOR INFORMATION

Name of Business Bernabe and Brinker Inc.

Name of Individual Gloria F. Brinker

Signature *Gloria F. Brinker* Date 03-18-02

PROPERTY OWNER OR MOST RECENT TANK OPERATOR (Circle one)

Name of Business Russ Elliot Inc.

Name of Individual _____

Signature [Signature] (FOR OWNER) Date 03-18-02

General Instructions

- Three (3) copies of this plan plus attachments and permit must be submitted to this Department.
- Any cutting into tanks requires Fire Services Agency approval.
- One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.
- State of California Permit Application Forms A and B are to submit to this office One Form A per site, one Form B for each removed tank.

Line Item Specific Instructions

2. SITE ADDRESS

Address at which closure is taking place.

5. EPA I.D. NO. - under which the tanks will be manifested
EPA I.D. numbers may be obtained from the State Department of Toxic Substances Control, 916/324-1781

6. CONTRACTOR

Prime contractor for the project.

10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES

- a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
- c) Tanks must be hauled as hazardous waste.
- d) This is the place where tanks will be taken for cleaning.

15) TANK HISTORY AND SAMPLING INFORMATION

Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the trig} water mark, etc.

16) CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS

See attached Table 2.

17) SITE HEALTH AND SAFETY PLAN

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer.
- b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;

INDICATE THE RESPONSIBLE PARTY TO BE BILLED FOR ADDITIONAL FSA/OES STAFF TIME EXPENDED BEYOND THE HOURS COVERED BY THE INITIAL DEPOSIT AMOUNT. THE PARTY MUST ACKNOWLEDGE THIS RESPONSIBILITY FOR THE ADDITIONAL BILLING BY SIGNATURE AND DATE BELOW.

NAME Jeannette Elliot

MAILING ADDRESS 1744 Skyview Drive San Leandro CA 94577
STREET CITY, STATE, ZIP

DAY PHONE NUMBER 510-763-1300
area code phone #

SIGNATURE *Jeannette Elliot* (FOR OWNER)

DATE 03-18-02

City Of Oakland
FIRE PREVENTION BUREAU
250 Frank Ogawa Plaza, Ste. 3341
Oakland California 94612-2032
510-238-3851



*Permit To Excavate And Install, Repair,
Or Remove Inflammable Liquid Tanks*

Oakland, California March 25, 2002

Tank Permit Number: 17-02

Permission Is Hereby Granted To:

Remove gasoline Tank And Excavate Commencing: Feet Inside: property Line.

On The:

Site Address: 2526 Wood Street Present Storage: gasoline

Owner: Jan Elliot Address: 2526 Wood St., Oakland, 94607 Phone: (510) 223-2805

Applicant: Bernabe & Brinker, Inc. Address: 2240 Wood St., Oakland, 94607 Phone: (510) 451-3482

Dimensions Of Street (sidewalk) Surface To Be Disturbed : X No. Of Tanks 1 Capacity 10,000 Gallons, Each

Remarks

This Permit Is Granted In Accordance With Existing City Ordinances. Owner Hereby Agrees To Remove Tanks On Discontinuance Of Use Or When Notified By The City Authorities When Installing, Removing Or Repairing Tanks, No Open Flame To Be On Or Near Premises.

CERTIFICATE OF TANK AND EQUIPMENT INSPECTION

Type Of Inspection: Removal

Inspected And Passed On: 4/22/02

By: [Signature]

UST/AST Installations/modifications:

Pressure Test: Inspected By: _____ Date: _____

Primary Piping Test: Inspected By: _____ Date: _____

Secondary Containment & Sump Testing: _____

Inspected By: _____ Date: _____

Final: Inspected By: _____ Date: _____

Approved: [Signature]
Fire Marshal

Inspection Fee Paid: \$ 540.00

Received By: [Signature]

Before Covering Tanks, Above Certification Must Be Signed When Ready For Inspection Notify Fire Prevention Bureau 238-3851

THIS PERMIT MUST BE LEFT ON THE WORK SITE AS AUTHORITY THEREFOR

OAKLAND FIRE DEPARTMENT, OES UNDERGROUND STORAGE TANK CLOSURE/REMOVAL FIELD INSPECTION REPORT

Site Address: <u>5526 VILLOSI ST</u>	Name of Facility: <u>RUSS ELLIOT</u>
Inspector: <u>GRIFIN</u>	Contact on site: <u>JIM BRINK</u>
Date and Time of Arrival: <u>7/22/02 1:10</u>	Contractor/Consultant: <u>BRUNOBE + PARTNER</u>

General Requirements	Yes	No	N/A
Approved closure plan on site.	✓		
Changes to approved plan noted.	✓		
Residuals properly stored/transported.	✓		
Receipt for adequate dry ice noted.	✓		

General Requirements	Yes	No	N/A
Site Safety Plan properly signed.	✓		
40B:C fire extinguisher on site.	✓		
"No Smoking" signs posted.	✓		
Gas detector challenged by inspector.	✓		

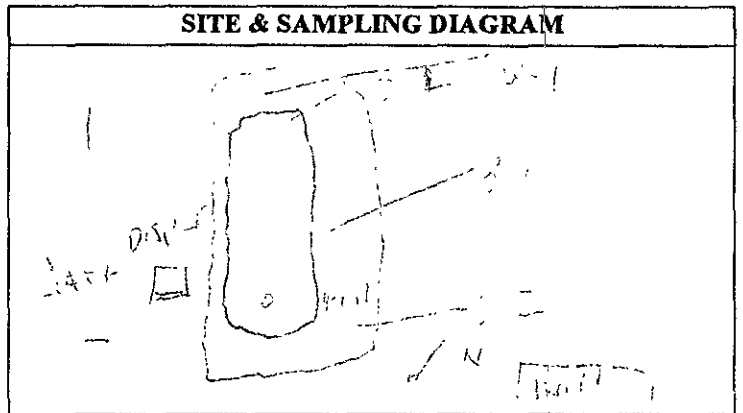
Tank Observations	T #1	T #2	T #3	T #4
Tank Capacity (gallons)	10000	/	/	/
Material last stored	GAS	/	/	/
Dry ice used (pounds)	400	/	/	/
Combustible gas concentration as %LEL. (Note time & sampling point)				
(1)	23	/	/	/
(2)	9	/	/	/
(3)		/	/	/
Oxygen concentration as % volume. (Note time & sampling point.)				
(1)	0	/	/	/
(2)	8	/	/	/
(3)		/	/	/
Tank Material	120	/	/	/
Wrapping/Coating, if any	x 10	/	/	/
Obvious holes?	JD	/	/	/

Tank Observations	T #1	T #2	T #3	T #4
Obvious corrosion?	L/L	/	/	/
Obvious odors from tank?	L/L	/	/	/
Seams intact?	Y/S	/	/	/
Tank bed backfill material	F/S	/	/	/
Obvious discoloration?	Y/S	/	/	/
Obvious odors ex tank bed?	V/S	/	/	/
Water in excavation?	Y/S	/	/	/
Sheen/product on water?	N/D	/	/	/
Tank tagged by transporter?	Y/S	/	/	/
Tank wrapped for transport?	N/D	/	/	/
Tank plugged w/ vent cap?	Y/S	/	/	/
Date/time tank hauled off?	7/22	/	/	/
No. of soil samples taken?	2	/	/	/
Depth of soil samples (ft. bgs)		/	/	/

Piping Removal	Yes	No	N/A
All piping removed hauled off w/ tanks?			
Obvious holes on pipes?		✓	
Obvious odors from pipes?		✓	
Obvious soil discoloration in piping trench?		✓	
Obvious odors from piping trench?		✓	
Water in piping trench?		✓	
Number & depth of soil samples from piping trench?			
Number & depth of water samples from piping trench?			

General Observations	Yes	No	N/A
Leak from any tank suspected?		✓	
"Leak Report" form given to the operator?			✓
Obviously contaminated soil excavated?	✓		
Soil stockpile sampled?	✓		
Stockpile lined AND covered?	✓		
Water in excavation sampled?	✓		✓
Number/depth of water samples taken?			1, 70 ft bgs
All samples properly preserved for transport?			

Additional Observations	Yes	No	N/A
Soil/water sampling protocols acceptable?	✓		
Sampling "chain of custody" noted?	✓		
Tank pit filled in or covered?	✓		
Tank pit fenced or barricaded?	✓		
Transporter a registered HW hauler?	✓		
Uniform HW Manifest completed?	✓		
Contractor/Consultant reminded of complete UST Removal Report due within 30 days?	✓		
Date/Time removal/closure operations completed?			
OT hours or additional charges due from contractor?			



Notes/Comments: did not see any signs of leaks or odors. all tanks empty.



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

133 ELLIS STREET
SAN FRANCISCO, CALIFORNIA 94109
415. 771-6000

REGULATION 8, RULE 40
Aeration of Contaminated Soil and
Removal of Underground Storage Tanks

NOTIFICATION FORM

- Removal ~~or~~ Replacement of Tanks
- Excavation of Contaminated Soil

SITE INFORMATION

SITE ADDRESS 2526 Wood Street
 CITY, STATE, ZIP Oakland, CA 94607
 OWNER NAME Jeannette Elliot
 SPECIFIC LOCATION OF PROJECT 2526 Wood St., Oakland, CA 94607

TANK REMOVAL

SCHEDULED STARTUP DATE 04-22-02

VAPORS REMOVED BY:

- WATER WASH
- VAPOR FREEING (CO²)
- VENTILATION

CONTAMINATED SOIL EXCAVATION

SCHEDULED STARTUP DATE 04-22-02

STOCKPILES WILL BE COVERED? YES X NO

ALTERNATIVE METHOD OF AERATION (DESCRIBE BELOW):

DISPOSAL

(MAY REQUIRE PERMIT)

CONTRACTOR INFORMATION

NAME Bernabe and Brinker Inc. CONTACT Ernesto F. Bernabe, Jr.
 ADDRESS 2240 Wood Street PHONE (510) 451-3482
 CITY, STATE, ZIP Oakland, CA 94607

CONSULTANT INFORMATION (IF APPLICABLE)

NAME _____ CONTACT _____
 ADDRESS _____ PHONE () _____
 CITY, STATE, ZIP _____

FOR OFFICE USE ONLY

DATE RECEIVED _____ BY _____ (INIT.)
 CC: INSPECTOR NO. _____ DATE _____ BY _____ (INIT.)
 TELEPHONE UPDATE: CALLER _____ CHANGE MADE _____
 BAAQMD N # _____

BERNABE AND BRINKER INC.
2240 Wood St., Oakland, CA 94607
Tel: 510-451-3482
Fax: 510-836-2635
E-mail: bebrinc@pacbell.net

FAX TRANSMISSION INFORMATION

DATE: 04-16-02
SEND TO: Enforcement Division
COMPANY: Bay Area Air Quality Management District
FAX NO: 415-928-0338
FROM: Gloria Brinker
COMPANY: Bernabe and Brinker Inc.
FAX: 510-836-2635
NO. OF PAGES: 3

If you do not receive the pages transmitted, please call us at 510-451-3482.

MESSAGE:

This is to inform you that the storage tank removal located at 2526 Wood Street, Oakland will be on April 22/02 at 1:PM.


Thanks,

I, am sending the permit to remove the UST dated 03-25-02.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802. WITHIN CALIFORNIA, CALL 916-835-8800.

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No <i>CA121012316161167</i>	Manifest Document No <i>115 117</i>	2 Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <i>ROSS ELLIOTT, INC. 2520 WOOD ST. OAKLAND CA 94607</i>			A. State Manifest Document Number 21080311			
4. Generator's Phone <i>916 763-1300</i>			B. State Generator's ID			
5. Transporter 1 Company Name <i>Ecology Control Industries</i>		6. US EPA ID Number <i>CA0982030173</i>		C. State Transporter's ID [Reserved.]		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone <i>(510) 235-1391</i>		
9. Designated Facility Name and Site Address <i>Ecology Control Industries 255 Pitt Blvd Pittsburg CA 94801</i>		10. US EPA ID Number <i>CA099406382</i>		E. State Transporter's ID [Reserved.]		
				F. Transporter's Phone		
				G. State Facility's ID <i>CA1010746631921</i>		
				H. Facility's Phone <i>510-235-1393</i>		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number	
Non-RCRA hazardous waste, solid (waste empty storage tank)		<i>2101</i>	<i>TP-15000</i>	<i>P</i>	State EPA/Other	
b.					State EPA/Other	
c.					State EPA/Other	
d.					State EPA/Other	
J. Additional Description for Materials Listed Above <i>EMPTY STORAGE TANK # 21 99</i>			K. Handling Codes for Wastes Listed Above			
TANKS HAVE BEEN DELETED WITH 15 LBS DRY ICE PER 100 GALLONS OF ACETONE			a. <i>99</i>			
			b.			
			c.			
			d.			
15. Special Handling Instructions and Additional Information Wear proper protective equipment while handling. Weights or volumes are approximate. 24 Hour emergency contact: <i>ERNE BERWASE</i> 24 Hour emergency telephone number: <i>510-451-3082</i> DOT ERG 11.1/12						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good-faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name <i>James Wilcox</i>		Signature <i>James Wilcox</i>		Month <i>04</i>	Day <i>13</i>	Year <i>01</i>
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Mike Fisher</i>		Month <i>04</i>	Day <i>15</i>	Year <i>01</i>
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month	Day	Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19		Signature <i>James Wilcox</i>		Month <i>04</i>	Day <i>13</i>	Year <i>01</i>

DO NOT WRITE BELOW THIS LINE.

1995-1996 Diesel UFST Removal Project

Trace Analysis Laboratory, Inc.
 3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-8860
 Facsimile (510) 783-1512



LOG NUMBER: 5718
 DATE SAMPLED: 07/27/95
 DATE RECEIVED: 07/28/95
 DATE EXTRACTED: 08/03/95
 DATE ANALYZED: 08/04/95
 DATE REPORTED: 08/04/95

CUSTOMER: Tank Protect Engineering
 REQUESTER: Jeff Farhoomand
 PROJECT: No. 352-072795, Russ Elliott, 2526 Wood Court, Oakland, CA

Sample Type: Soil

Method and Constituent:	S-1		S-2		Composite of SPI(A-D)	
	Concentration	Reporting Limit	Concentration	Reporting Limit	Concentration	Reporting Limit
DHS Method: Total Petroleum Hydrocarbons as Diesel	ug/kg 310,000	1,000	ND	1,000	340,000	1,000

Bank per billion (handwritten note pointing to 310,000)

Method and Constituent:	Method Blank	
	Concentration	Reporting Limit
DHS Method: Total Petroleum Hydrocarbons as Diesel	ug/kg ND	1,000

QC Summary:
 % Recovery: 111
 % RPD: 5.7

Concentrations reported as ND were not detected at or above the reporting limit.



LOG NUMBER: 5718
DATE SAMPLED: 07/27/95
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DATE ANALYZED: 08/03/95
DATE REPORTED: 08/04/95
PAGE: Two

Sample Type: Soil

Method and Constituent:	Units	S-1		S-2		Composite of SP1(A-D)	
		Concentration	Reporting Limit	Concentration	Reporting Limit	Concentration	Reporting Limit
DHS Method: Total Petroleum Hydrocarbons as Gasoline	ug/kg	1,900,000	71,000	ND	500	960,000	36,000
Modified EPA Method 8020 for:							
Benzene	ug/kg	2,600	1,400	ND	5.0	ND	720
Toluene	ug/kg	ND	1,400	ND	5.0	ND	720
Ethylbenzene	ug/kg	26,000	1,400	5.4	5.0	14,000	720
Xylenes	ug/kg	100,000	4,300	ND	15	64,000	2,200

Method and Constituent:	Units	Method Blank	
		Concentration	Reporting Limit
DHS Method: Total Petroleum Hydrocarbons as Gasoline	ug/kg	ND	500
Modified EPA Method 8020 for:			
Benzene	ug/kg	ND	5.0
Toluene	ug/kg	ND	5.0
Ethylbenzene	ug/kg	ND	5.0
Xylenes	ug/kg	ND	15

QC Summary:

% Recovery: 71
% RPD: 5.0

Concentrations reported as ND were not detected at or above the reporting limit.

Louis W. DuPuis
Louis W. DuPuis
Quality Assurance/Quality Control Manager

WAVE

5718



TANK PROTECT ENGINEERING

2821 WHIPPLE ROAD
UNION CITY, CA 94587
(415) 429-8888
(800) 523-3888
FAX (415) 429-8089

LAB: T.AL

TURNAROUND: NORMAL (5 DAYS)

P.O. #: ND

CHAIN OF CUSTODY

PAGE 1 OF 1

TRACE ANALYSIS

5187831512

08/04/05 16:08

PROJECT NO. 353-012745		SITE NAME & ADDRESS TANK BUILT BY CO 2821 WHIPPLE RD UNION CITY, CA				(1) TYPE OF CONTAINER	ANALYTES REQUESTED TOTAL LEAD PPM AROMATIC HC (BPT) TOTAL BENTH PPM OIL & GREASE PCB BLEN (BPT's) OTHER	REMARKS
SAMPLER NAME, ADDRESS AND TELEPHONE NUMBER Level TANK I 2821 WHIPPLE ROAD, UNION CITY, CA 94587 (415) 429-8888								
ID NO.	DATE	TIME	SOIL	WATER	SAMPLING LOCATION			
S-1	7/27/05	1:00	✓		S-1 @ 2.0' sub well / 1' out of tank pt.	APRIL TANK		
S-2		1:05			S-2 @ 40' sub well / 1' out of tank pt.			
SP1-A		1:36			SP1-A @ 2.5' storage tank		Composite	
SP1-B		1:40			SP1-B @ 2.5' storage tank			
SP1-C		1:45			SP1-C @ 2.5' storage tank			
SP1-D		1:50			SP1-D @ 2.5' storage tank			

Relinquished by: (Signature) <i>[Signature]</i>	Date / Time 7/28/05 11:50 AM	Received by: (Signature) <i>[Signature]</i>	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature) <i>[Signature]</i>	Date / Time 7/28/05 11:50 AM	Remarks	

pl. 1.7 - 5T each, 1-2, 2.5, 5.0

DATE: _____

Hull Development Labs, Inc.

CA ELAP# 1369

525 Del Rey Avenue, Suite E • Sunnyvale, CA 94086 • (408) 735-1550 • Fax (408) 735-1554

Tank Protect Engineering
2821 Whipple Road
Union City, CA 94587
Attn: Louis Travis III

Date:	10/13/95
Date Received:	10/6/95
Date Analyzed:	10/12/95
Project #:	352-100495
P.O. #:	1128
Sampled By:	Client

Certified Analytical Report

Water Sample Analysis:

Test	WS-1	Units	MDL	EPA Method #
Sample Matrix	Water			
Sample Date	10/4/95			
Sample Time	12:50			
Lab #	B10788			
DF-Diesel	1			
TPH-Diesel	ND	µg/liter	50.0 µg/l	8015M
DF-Gas/BTEX	1			
TPH-Gas	ND	µg/liter	50.0 µg/l	8015M
Benzene	ND	µg/liter	0.5 µg/l	8020
Toluene	ND	µg/liter	0.5 µg/l	8020
Ethyl Benzene	ND	µg/liter	0.5 µg/l	8020
Xylenes	ND	µg/liter	0.5 µg/l	8020

1. $PQL = DF \times MDL$
2. Analysis performed by Hull Development Labs, Inc. (CAELAP #1369)

Michael N. Golden, Lab Director

DF=Dilution Factor
MDL=Method Detection Limit

PQL=Practical Quantitation Limit
ND=None Detected at or above PQL

Environmental Analysis Since 1983



TANK PROTECT ENGINEERING

2821 WHIFFLE ROAD
 UNION CITY, CA 94587
 (415) 429-8000
 (800) 523-8800
 FAX (415) 429-8889

LAB: HULL

TURNAROUND: Normal

P.O. #: 1128

PAGE 1 OF 1

CHAIN OF CUSTODY

PROJECT NO.		SITE NAME & ADDRESS				(1) TYPE OF CONTAINER	ANALYTES REQUESTED						REMARKS
352-100945		2821 Whiffle Rd Union City, CA (415) 429-8000					TOTAL LIQUID HC	AROMATIC HC (PH)	TOTAL HEAVY HC	OLEFINS & GASES	PC (METHANOL)	OTHER	
ID NO.	DATE	TIME	SOIL	WATER	SAMPLING LOCATION								
WS-1	10/6/98	11:30		✓	WS-1 @ 1'-2' bgs in excavation pit	2-48 ml	✓	✓	✓				B10788
Relinquished by: (Signature)		Date / Time		Received by: (Signature)		Relinquished by: (Signature)		Date / Time		Received by: (Signature)			
<i>[Signature]</i>		10/6/98 12:30		<i>CAWSES WOLD</i>		<i>CAWSES WOLD</i>		10/6 12:50 PM		<i>Li Jann</i>			
Relinquished by: (Signature)		Date / Time		Received by: (Signature)		Relinquished by: (Signature)		Date / Time		Received by: (Signature)			
Relinquished by: (Signature)		Date / Time		Received for Laboratory by: (Signature)		Date / Time		Remarks					

samples rec'd chilled & intact by lab *(AS)*

DATE: _____

10/13/1998 18:27 1488/351238

Trace Analysis Laboratory

CA ELAP# 1199

3423 Investment Boulevard, #8 • Hayward, CA 94545 • (510) 783-6960 • Fax (408) 735-1554

Tank Protect Engineering
2821 Whipple Road
Union City, CA 94587-1233
Attn: Lee Huckins

Date:	6/18/96
Date Received:	6/7/96
Date Analyzed:	6/11-12/96
Project:	352 060696
Sampled By:	Client

Certified Analytical Report

Soil Sample Analysis:

Test	VS-1	VS-2	VS-3	Units	PQL	EPA Method #
Sample Method	Grab	Grab	Grab			
Sample Date	6/6/96	6/6/96	6/6/96			
Sample Time	1431	1523	1510			
Lab #	HC1389	HC1390	HC1391			
DF-Diesel	1	1	1			
TPH-Diesel	ND	ND	ND	mg/kg	1.0 mg/kg	8015M
DF-Gas/BTEX	1	1	1			
TPH-Gas	ND	ND	ND	mg/kg	1.0 mg/kg	8015M
MTBE	ND	ND	ND	mg/kg	0.05 mg/kg	8020
Benzene	ND	ND	ND	mg/kg	0.005 mg/kg	8020
Toluene	ND	ND	ND	mg/kg	0.005 mg/kg	8020
Ethyl Benzene	ND	ND	ND	mg/kg	0.005 mg/kg	8020
Xylenes	ND	ND	ND	mg/kg	0.005 mg/kg	8020

1. DLR=DF x PQL
2. Analysis performed by Entech Analytical Labs, Inc. (CAELAP #1369)



Michael N. Golden, Lab Director

DF=Dilution Factor
DLR=Detection Reporting Limit

PQL=Practical Quantitation Limit
ND=None Detected at or above DLR

Trace Analysis Laboratory

CA ELAP# 1199

3423 Investment Boulevard, #8 • Hayward, CA 94545 • (510) 783-6960 • Fax (408) 735-1554

Tank Protect Engineering
2821 Whipple Road
Union City, CA 94587-1233
Attn: Lee Huckins

Date:	6/18/96
Date Received:	6/7/96
Date Analyzed:	6/11-12/96
Project:	352 060696
Sampled By:	Client

Certified Analytical Report

Soil Sample Analysis:

Test	VS-4	VS-5	STK A to D	Units	PQL	EPA Method #
Sample Method	Grab	Grab	Comp			
Sample Date	6/6/96	6/6/96	6/6/96			
Sample Time	1441	1507				
Lab #	HC1392	HC1393	HC1394			
DF-Diesel	1	1	25 ²			
TPH-Diesel	ND	ND	ND	mg/kg	1.0 mg/kg	8015M
DF-Gas/BTEX	1	1	50			
TPH-Gas	ND	ND	340	mg/kg	1.0 mg/kg	8015M
MTBE	ND	ND	ND	mg/kg	0.05 mg/kg	8020
Benzene	ND	ND	0.80	mg/kg	0.005 mg/kg	8020
Toluene	ND	ND	1.2	mg/kg	0.005 mg/kg	8020
Ethyl Benzene	ND	ND	0.71	mg/kg	0.005 mg/kg	8020
Xylenes	ND	ND	ND	mg/kg	0.005 mg/kg	8020

1. DLR=DF x PQL
2. Sample diluted due to presence of non-target compounds
3. Analysis performed by Entech Analytical Labs, Inc. (CAELAP #1369)


Michael N. Golden, Lab Director

DF=Dilution Factor
DLR=Detection Reporting Limit

PQL=Practical Quantitation Limit
ND=None Detected at or above DLR

Entech Analytical Labs, Inc.

525 Del Rey Avenue, Suite
Sunnyvale, CA 94086

QUALITY CONTROL RESULTS SUMMARY

QC Batch #: DS069604

Matrix: Soil

Units: mg/kg

Date analyzed: 06/11/96

Date extracted: 06/11/96

PARAMETER	Method #	SA	SR	SP	SP	SPD	SPD	RPD	QC LIMITS (ADVISORY)	
		mg/kg	mg/kg	mg/kg	%R	mg/kg	%R		RPD	%R
Diesel	8015M	25	ND	24.1	96%	25.0	100%	3.7	25	50-150

Definition of Terms:

na: Not Analyzed in QC batch

SA: Spike Added

SR: Sample Result

RPD(%): Duplicate Analysis - Relative Percent Difference

SP: Spike Result

SP (%R): Spike % Recovery

SPD: Spike Duplicate Result

SPD (%R): Spike Duplicate % Recovery

NC: Not Calculated

QA/QC Officer: Nick J. Gaone

N. Gaone

Entech Analytical Labs, Inc.

525 Del Rey Avenue, Suite E
Sunnyvale, CA 94086

QUALITY CONTROL RESULTS SUMMARY

METHOD: Gas Chromatography

QC Batch #: GBG4081196

Date Analyzed: 06/11/96

Matrix: Water/Soil

Units: µg/L

PARAMETER	Method #	SA µg/L	SR µg/L	SP µg/L	SP % R	SPD µg/L	SPD %R	RPD	QC LIMITS (ADVISORY)	
									RPD	%R
Gasoline	8015M	222	ND	218	98%	223	100%	2.3	25	50-150
Benzene	8020	20	ND	20.0	100%	20.0	100%	0.0	25	50-150
Toluene	8020	20	ND	25.0	125%	21.0	105%	17.4	25	50-150

Definition of Terms:

na: Not Analyzed in QC batch

SA: Spike Added

SR: Sample Result

RPD(%): Duplicate Analysis - Relative Percent Difference

SP: Spike Result

SP (%R): Spike % Recovery

SPD: Spike Duplicate Result

SPD (%R): Spike % Recovery

NC: Not Calculated

QA/QC Officer: Nick J. Gaone

N. Gaone



TANK PROTECT ENGINEERING
of Northern California, Inc.
2821 Whipple Rd., Union City, CA 94507-1233

(510) 429-8088 ■ (1100) 523-8088 ■ Fax (510) 429-8089

LAB: Entech
TURNAROUND: 10 day
P.O. #: 1305

CHAIN OF CUSTODY

PAGE 1 OF 1

PROJECT NO.		SITE NAME & ADDRESS				(1) TYPE OF CON- TAINER	ANALYTES REQUESTED						REMARKS
357060696		Russ Elliot 2526 Wood St Oakland					TOTAL LIGHT HC	AROMATIC HC	TOTAL HEAVY HC	OIL & GREASE	PCC SOLID (624's)	OTHER	
SAMPLER NAME, ADDRESS AND TELEPHONE NUMBER													
Lee Hickins 2821 WHIPPLE ROAD, UNION CITY, CA 94587 (415) 429-8088													
ID NO.	DATE	TIME	SOIL	WATER	SAMPLING LOCATION								
VS-1	6/6	1431	X		3.0	BRASS	X	X					added TPH/GH per HC 1389
VS-2	6/6	1523			3.0								Lee Hickins (6/11/92) HC 1390
VS-3	6/6	1510			4.0								HC 1391
VS-4	6/6	1441			4.0								HC 1392
VS-5	6/6	1507			4.0								HC 1393
STR-A	6/6	1125			2.0								} Composite into 1 sample HC 1394
STR-B	6/6	1122			2.0								
STR-C	6/6	1130			2.0								
STR-D	6/6	1132			2.0								
Relinquished by: (Signature)		Date / Time		Received by: (Signature)		Relinquished by: (Signature)		Date / Time		Received by: (Signature)			
Lee Hickins													
Relinquished by: (Signature)		Date / Time		Received by: (Signature)		Relinquished by: (Signature)		Date / Time		Received by: (Signature)			
Relinquished by: (Signature)		Date / Time		Received for Laboratory by: (Signature)		Date / Time		Remarks					
				Eduardo Reviera		060726 4:45							

DATE: _____

2002 Gasoline UFST Removal Project

McC Campbell Analytical Inc.

110 2nd Avenue South, #D7, Pacheco, CA 94553-5560
Telephone 925-798-1620 Fax 925-798-1622
<http://www.mccampbell.com> E-mail: main@mccampbell.com

Bernabe & Brinker Inc 2240 Wood Street Oakland, CA 94608	Client Project ID: Russ Elliot, Inc.	Date Sampled: 04/22/02
		Date Received: 04/23/02
	Client Contact: Mark Varney	Date Reported: 04/29/02
	Client P.O.:	Date Completed: 06/26/02

June 26, 2002

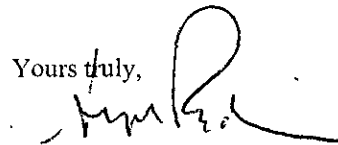
Dear Mark:

Enclosed are:

- 1). the results of 6 samples from your **Russ Elliot, Inc. project**,
- 2). a QC report for the above samples
- 3). a copy of the chain of custody, and
- 4). a bill for analytical services.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits. If you have any questions please contact me. McC Campbell Analytical Laboratories strives for excellence in quality, service and cost. Thank you for your business and I look forward to working with you again.

Yours truly,



Angela Rydelius, Lab Manager

McC Campbell Analytical Inc.

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 Telephone 925-798-1620 Fax: 925-798-1622
 http://www.mcccampbell.com E-mail: main@mcccampbell.com

Bernabe & Brinker Inc 2240 Wood Street Oakland, CA 94608	Client Project ID: Russ Elliot, Inc.	Date Sampled: 04/22/02
		Date Received: 04/23/02
	Client Contact: Mark Varney	Date Extracted: 04/23/02
	Client P.O.:	Date Analyzed: 04/23/02-04/25/02

Gasoline Range (C6-C12) Volatile Hydrocarbons as Gasoline with BTEX and MTBE*

Extraction method: SW5030B Analytical methods: SW8021B/8015Cm Work Order: 0204361

Lab ID	Client ID	Matrix	TPH(g)	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	DF	% SS
001A	S-1	S	ND	0.24	ND	ND	ND	ND	1	111
002A	S-2	S	ND	ND	ND	ND	ND	ND	1	115
003A	B-1	S	ND	0.078	ND	ND	ND	ND	1	106
004A	STK 1A-1D	S	ND	0.15	ND	ND	ND	ND	1	104
005A	D-1	S	ND	ND	ND	ND	ND	ND	1	104
006A	W-1	W	790,a,i	810	48	120	14	88	10	103

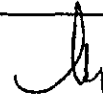
Reporting limit for DF = 1, ND means not detected at or above the reporting limit	W	50	5.0	0.5	0.5	0.5	0.5	ug/L
	S	1.0	0.05	0.005	0.005	0.005	0.005	mg/Kg

*water and vapor samples are reported in ug/L, soil and sludge samples in mg/kg, wipe samples in ug/wipe, and TCLP extracts in ug/L

DF = dilution factor.

cluttered chromatogram; sample peak coelutes with surrogate peak.

+The following descriptions of the TPH chromatogram are cursory in nature and McC Campbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified gasoline is significant; b) heavier gasoline range compounds are significant(aged gasoline?); c) lighter gasoline range compounds (the most mobile fraction) are significant; d) gasoline range compounds having broad chromatographic peaks are significant, biologically altered gasoline?; e) TPH pattern that does not appear to be derived from gasoline (stoddard solvent); f) one to a few isolated non-target peaks present; g) strongly aged gasoline or diesel range compounds are significant; h) lighter than water immiscible sheen/product is present, i) liquid sample that contains greater than ~2 vol. % sediment; j) no recognizable pattern; k) TPH pattern that does not appear to be derived from gasoline (aviation gas).



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QC SUMMARY REPORT FOR SW8021B/8015Cm

BatchID: 1438

Matrix: S

WorkOrder: 0204361

Compound	Sample	Spiked	MS*	MSD*	MS-MSD*	LCS	LCSD	LCS-LCSD/Acceptance Criteria (%)		
	mg/Kg	mg/Kg	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	Low	High
TPH(gas)	ND	0.60	88.1	87.3	0.884	107	108	1.3	70	130
MTBE	ND	0.10	99.5	99.2	0.266	92.8	98.1	5.6	70	130
Benzene	ND	0.10	90.4	92.5	2.33	104	108	3.6	70	130
Toluene	ND	0.10	93.3	96	2.75	106	110	3.7	70	130
Ethylbenzene	ND	0.10	92.2	94.3	2.17	109	111	2.0	70	130
Xylenes	ND	0.30	90.3	94.3	4.33	107	107	0	70	130
%SS	115	0.10	114	115	0.780	103	106	2.6	70	130

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:
 NONE

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation

N/A = not enough sample to perform matrix spike, or analyte concentration in sample exceeds spike amount.

% Recovery = $100 * (MS - Sample) / (Amount Spiked)$; RPD = $100 * (MS - MSD) / (MS + MSD) * 2$.

* MS and / or MSD spike recoveries may not be near 100% or their RPDs near 0% if: a) the sample is inhomogeneous AND contains significant concentrations of analyte relative to the amount spiked, or b) if that specific sample matrix interferes with spike recovery.

QC SUMMARY REPORT FOR SW8021B/8015Cm

BatchID: 1436

Matrix: W

WorkOrder: 0204361

EPA Method: SW8021B/8015Cm		Extraction: SW5030B		Ext. Date: 4/23/02		Spiked Sample ID: Q204356-002A				
Compound	Sample	Spiked	MS*	MSD*	MS-MSD*	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)	
	µg/L	µg/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	Low	High
TPH(gas)	ND	60	97.3	101	3.98	110	108	2.1	70	130
MTBE	ND	10	101	106	4.30	95.7	92.1	3.8	70	130
Benzene	ND	10	101	106	5.05	94.2	93.1	1.2	70	130
Toluene	ND	10	106	113	5.83	98.8	97.4	1.4	70	130
Ethylbenzene	ND	10	103	109	5.10	102	99.9	2.2	70	130
Xylenes	ND	30	103	107	3.17	103	99.3	4.0	70	130
%SS	101	10	108	109	0.487	98.3	101	2.7	70	130

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:
 NONE

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate, RPD = Relative Percent Deviation

N/A = not enough sample to perform matrix spike, or analyte concentration in sample exceeds spike amount

% Recovery = $100 * (MS - Sample) / (Amount Spiked)$; $RPD = 100 * (MS - MSD) / (MS + MSD) * 2$.

* MS and / or MSD spike recoveries may not be near 100% or their RPDs near 0% if: a) the sample is inhomogeneous AND contains significant concentrations of analyte relative to the amount spiked, or b) if that specific sample matrix interferes with spike recovery.

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Bernabe & Brinker Inc 2240 Wood Street Oakland, CA 94608	Client Project ID: Russ Elliot, Inc.	Date Sampled: 04/22/02
		Date Received: 04/23/02
	Client Contact: Mark Varney	Date Extracted: 04/23/02
	Client P.O.:	Date Analyzed: 04/23/02

Lead by ICP*

Extraction method. SW3050B

Analytical methods: 6010C

Work Order: 0204361

Lab ID	Client ID	Matrix	Extraction	Lead	DF	% SS
0204361-001A	S-1	S	TTLC	8.5	1	99.0
0204361-002A	S-2	S	TTLC	ND	1	100
0204361-003A	B-1	S	TTLC	3.1	1	102
0204361-004A	STK 1A-1D	S	TTLC	9.9	1	97.0
0204361-005A	D-1	S	TTLC	11	1	99.0

Reporting Limit for DF=1;
 ND means not detected at or
 above the reporting limit

W
 S

TTLC
 TTLC

NA
 3.0

mg/L
 mg/Kg

* water samples are reported in mg/L, soil/sludge/solid/product samples in mg/kg, wipes in ug/wipe and all TCLP / STLC / DISTLC / SPLP extracts in mg/L.

ND means not detected above the reporting limit; N/A means not applicable to this sample or instrument.

Analytical Methods: EPA 6010C/200.7 for all elements except: 200.9 (water- Sb, As, Pb, Se, Tl); 245.1 (Hg); 7010 (sludge/soil/solid/oil/product/wipes - As, Se, Tl); 7471B (Hg).

DISTLC extractions are performed using STLC methodology except that deionized water is substituted for citric acid buffer as the extraction fluid. DISTLC results are not applicable to STLC regulatory limits.

1) liquid sample that contains greater than ~2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations; z) reporting limit raised due to matrix interference.



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QC REPORT

Date: 04/23/02

Extraction: TTLC

Matrix: Soil

Compound	Concentration: mg/kg			%Recovery		RPD	
	Sample	MS	MSD	Amount Spiked	MS		MSD
SampleID: 42002			Instrument P-1 AA				
Lead	ND	4.9	4.9	5.00	98	99	0.9

$$\% \text{ Recovery} = \frac{(MS - \text{Sample})}{\text{Amount Spiked}} \cdot 100$$

$$RPD = \frac{(MS - MSD)}{(MS + MSD)} \cdot 2 \cdot 100$$



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QC REPORT

Date: 04/24/02

Extraction: Dissolved

Matrix: Water

Compound	Concentration: ug/L			%Recovery		RPD	
	Sample	MS	MSD	MS	MSD		
SampleID: 42401				Instrument: GFAA-1			
Lead	ND	9.1	9.1	10.00	91	91	0.2

$$\% \text{ Recovery} = \frac{(MS - \text{Sample})}{\text{Amount Spiked}} \cdot 100$$

$$RPD = \frac{(MS - MSD)}{(MS + MSD)} \cdot 100$$

RPD means Relative Percent Deviation