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9:23 am, Jun 28, 2010

Alameda County Environmental Health Paulette Satterley 14601 Guadalupe Dr. Rancho Murieta, Ca 95683 Telephone 916-768-2003

June 21, 2010

Ms. Barbara Jakub Alameda County Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502

Re: Fuel Leak Case No: RO0000133

Paulette Satterley

Enclosed please find the 2010 First Semi-Annual Groundwater Monitoring Report for the former City of Paris Cleaners site located at 3516 Adeline Street, Oakland, CA 94608 and dated June 15, 2010. This report was prepared by Taber Consultants of West Sacramento, California.

I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document are true and correct to the best of my knowledge.

Sincerely,

Paulette Satterley

2010 FIRST SEMI-ANNUAL MONITORING REPORT

Former City of Paris Cleaners 3516 Adeline Street Oakland, California 94608

USTCF Claim #002192

Prepared For:

Ms. Paulette Satterley 14601 Guadalupe Drive Rancho Murieta, CA 95683

Prepared By:

Taber Consultants 3911 West Capitol Avenue West Sacramento, CA 95691

Taber Project # 051074

June 15, 2010





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1.0 INTRODUCTION

1.1 Project Description

On behalf of the Ms. Paulette Satterley, Taber Consultants has prepared this 2010 First Semi-Annual Monitoring Report for submittal to the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) and Alameda County Health Care Services Agency (ACHSA). The scope of work conducted during this project complies with existing SFBRWQCB and ACHSA directive letters.

1.2 Site Location and Description

The former City of Paris Cleaners, located at 3516 Adeline St., Oakland, CA, is a former dry cleaning, laundry and dyeing operation currently owned by Mrs. Debra Runyon. The facility operated as City of Paris Cleaners and Dyers for about 40 years until the 1960's, but cleaning materials and tanks were not completely removed from the site until 1992. The site buildings remained vacant for a number of years following the closure of the dry cleaning operation, and then the owner converted them to residential and light commercial use.

The site lies at the southern corner of the intersection of 35th Street and Adeline Street at approximately 30 feet above mean sea level (amsl) in the northwest portion of the City of Oakland, California. The site buildings currently house on-site living quarters and City of Paris Studios, a workshop for art, art restoration, collectibles and hobbies. Mrs. Runyon acquired the site in July 2000.

1.3 Chronological Site History and Previous Subsurface Investigations

In 1987, Frank Champion, the owner at that time, applied for permits for remove Stoddard Solvent storage tanks at the site. Mr. Champion applied for five permits, obtaining permission to remove two 1000-gallon tanks, a 500-gallon tank, a 250-gallon tank and a 150-gallon tank. Underground storage tanks at the site were used to store Stoddard Solvent, the dry cleaning solvent used during operation of the dry cleaning facility until the 1960s when the facility was closed.

On October 4, 1990, Semco Company of San Mateo excavated and reported removing one 750-gallon and two 1,000-gallon underground tanks used to store Stoddard Solvent. Six soil samples were collected in conjunction with the UST removal.

On July 31 and August 1 and 2, 1991, Uriah Inc. (UES) performed a soil vapor survey at the site in an attempt to define the approximate boundaries of soil impacted by Stoddard Solvent. Soil vapors were found to be widely distributed across the site, but due to physical impediments posed by site structures, sidewalks, etc., the full extent of the impacted soil was not defined.

UES contracted W.A. Craig to overexcavate the eastern portion of the tank pit on August 30, 1991. Approximately 44 cubic yards were excavated and placed in a cell for



on-site bioremediation of the impacted soil. During overexcavation, EUS reports that the contractor discovered an additional 250-gallon UST containing "a small volume of liquid" that was stored in a 55-gallon drum on site after removing an aliquot for analysis. This UST was removed and disposed by W. A. Craig on October 31, 1991. An additional 15 cubic yards was overexcavated from the tank pit by W.A. Craig on January 27, 1992 and added to the on-site bioremediation cell.

On March 31, 1992, composite samples of the on-site bioremediated soil were analyzed to verify that sufficient hydrocarbon removal had occurred to reuse as fill on the site. No additional soils were excavated due to safety concerns regarding building foundation integrity, however soil samples were collected from the tank pit side walls. ACHCSA approved use of the bioremediated soil as backfill, and W. A. Craig backfilled the tank pit with bioremediated soil and clean fill on April 21, 1992.

On October 29 and 30, 1992, UES supervised on-site installation of ground water monitoring wells. Soils Exploration Services of Vacaville, California, installed three 30-foot monitoring wells. Initial depth to groundwater measurements in the wells ranged from 13 to 14 feet below grade. Beginning November 18, 1992, groundwater samples were analyzed for Total Petroleum Hydrocarbons (as Stoddard Solvent, TPH-SS), Total Petroleum Hydrocarbons (as diesel, TPH-D), Total Petroleum Hydrocarbons (as gasoline, TPH-G), methyl tertiary butyl ether (MtBE), benzene, toluene, ethylbenzene and total xylenes (BTEX). Samples from all three monitoring wells contained TPH-SS ranging from 630 parts per billion (ppb) in MW-2 to 11,000 ppb in MW-3. TPH-D, TPH-G, MtBE and BTEX concentrations were below laboratory detection limits.

On March 19, 1998, Dugan Associates of San Jose, California (Dugan) advanced six on and off-site soil borings to a total depth of 18 feet below grade. Five of the soil borings were advanced on the north side of 35th Street in the projected downgradient direction from the site (EB-2 through EB-6). One soil boring was advanced on-site to the northwest of the former UST location (EB-1). At each soil boring, Dugan collected a soil sample at 5, 10 and 15 feet below grade and one grab-groundwater sample at 18 feet below grade . The on-site soil boring (EB-1) groundwater sample concentration was 270,000 ppb TPH-SS, with one off-site groundwater sample (EB-5) reporting 780 ppb TPH-SS. Concentrations of analytes for all other groundwater samples from the soil borings were below laboratory detection limits. Soil samples at EB-1 contained 310 and 340 ppb of TPH-SS at 10 and 15 ft. below grade, respectively, and trace amounts of total xylenes and/or toluene.

In September, 1999, ACHSA issued a directive letter which required groundwater analysis for semivolatile organics (SVOCs) and volatile organics (VOCs) historically associated with dry cleaning operations. In December 1999, using EPA method 625 and 3510, or 8270 and 3550, 1,2-dichlorobenzene (DCB), 1,1-dichloroethane (1,1 DCA), 2-methylnaphthalene and naphthalene were detected in samples from one or more wells. Concentrations of other SVOC and VOC analytes were below laboratory detection limits, including denser than aqueous phase liquids (DNAPLs, i.e. pentachlorophenol (PCP)). At that time Dugan defined a north-trending groundwater gradient at 0.003 ft./ft.



In their September, 1999 letter, the ACHSA also noted that according to a database search they believed a 97-foot industrial well had been drilled at the site. The well was located southeast of Monitoring Well 3 (Figure 2).

In March 2002, in compliance with an ACHSA directive letter, WellTest, Inc. (formerly Dugan and Associates) redeveloped the three monitoring wells (by purging 10 well-volumes) and sampled the three wells pursuant to quarterly monitoring responsibilities. WellTest, Inc. also sampled the industrial well on-site. The analytical results of the sampling indicated up to 11,000 μ g/L of TPH-SS in the sample from MW-1, no BTEX above laboratory detection limits, up to 31 μ g/L MtBE in the sample from MW-3, 0.61 μ g/L DCB in the sample from MW-1, and 130 μ g/l Naphthalene in MW-1. The groundwater gradient was also defined to the southeast at 0.14 ft./ft., which appears to be an anomalously steep gradient for this site. This steep gradient may be a result of sediment blocking some or all of the screened section of one or more well. When Dugan redeveloped the wells in 2002, they appear to have adversely impacted the ability of the wells to adjust to changing water levels.

Taber Consultants, formerly Western Resource Management (WRM), assumed environmental consulting responsibilities for the site commencing in June 2007. Taber performed groundwater monitoring at the site for the first and second semiannual periods of 2009. In response to a query by ACHSA, Taber submitted a well completion report request to the California Department of Water Resources, in which undated well boring logs for a well at the City of Paris Cleaners, at 3516 Adeline Street, indicated a 97-foot industrial well on the site. Taber also found well drilling information for another industrial well drilled in 1927 for the City of Paris Cleaners, drilled to 295 feet. The location of this well is unknown, and the well could have been covered by buildings constructed after the well was taken out of service.

July 28, 2009, ACHCSA advised Responsible Parties that The California State Water Resources Control Board (State Water Board) had approved Resolution No. 2009-0042, which reduced quarterly groundwater monitoring requirements to semiannual or less frequent monitoring at all sites. In 2009, Taber reduced monitoring at the City of Paris Cleaners site to two semiannual monitoring events at the site in February and August. Corresponding reports were the First Semiannual and Second Semiannual Monitoring Reports.

In August of 2009 Taber Consultants evaluated using the HydraSleeve® no-purge sampling method at the site. With verbal authorization from Barbara Jakub of ACHCSA, on March 17, 2010, Taber Consultants implemented use of the HydraSleeve® sampling protocol for all wells at the site.



2.0 GROUNDWATER MONITORING, SAMPLING, AND ANALYSIS

On March 17, 2010, to comply with semiannual groundwater monitoring requirements, Taber Consultants gauged and sampled on-site groundwater monitoring wells MW-1 through MW-3. An on-site industrial well (W-IND) was also monitored and sampled this period.

2.1 Groundwater Monitoring

Depth-to-groundwater was measured in the three monitoring wells using a water level meter capable of measurements to within 0.01 foot. Groundwater elevation was 8.13, 8.36 and 5.5 above mean sea level (amsl) at MW-1, MW-2 and MW-3, respectively. The apparent direction of groundwater flow is to the northeast at a gradient of 0.109 feet per foot. A groundwater surface contour map is included as Figure 3 and groundwater elevation data are summarized in Tables 1 and 2. Field data sheets for the groundwater monitoring are included as Appendix A.

2.2 Groundwater Sampling and Analysis

Following groundwater level measurements, the four wells were sampled in accordance with the HydraSleeve® no-purge sampling protocol. The HydraSleeve® was lowered into the well, water levels were allowed to equilibrate, then a representative sample from the groundwater was collected using the HydraSleeve® as it was carefully retrieved from the well. Taber Consultants then transferred the sample from the HydraSleeve® into the laboratory-supplied containers. The samples were transported in an iced cooler with chain-of-custody documentation to Sparger Technology, Inc. (Sparger), of Rancho Cordova, California, a state certified analytical laboratory (ELAP Certification #1614).

Sparger analyzed each of the groundwater samples for Total Petroleum Hydrocarbons as Stoddard solvent (TPH-SS) and Total Petroleum Hydrocarbons as gasoline (TPH-G) by EPA Method 8015B, benzene, toluene, ethyl benzene and xylenes (BTEX), and oxygenate methyl tertiary butyl ether (MtBE) by EPA Method 8260B.

TPH-SS was detected in groundwater samples collected from MW-1 and MW-3 at 4,000 and 3,000 μ g/l, respectively. TPH-G was detected in groundwater samples collected from MW-1 and MW-3 at 12,000 and 4,600 μ g/l, respectively. MtBE was detected in groundwater samples collected from MW-2 and MW-3 at 1.8 and 9.4 μ g/l, respectively. Xylenes were detected in MW-1 at 20 μ g/l, otherwise BTEX concentrations were below minimum laboratory detection limits for the other samples. All tested analytes were below laboratory detection limits in W-IND.

The distribution of petroleum hydrocarbon compounds and fuel oxygenates in shallow groundwater is shown on Figure 4. The groundwater sample analytical results are summarized in Tables 1 and 2 and the laboratory reports, notes, and comments are included in Appendix B.



3.0 SCHEDULE OF UPCOMING ACTIVITIES

On behalf of Ms. Paulette Satterley, Taber Consultants have been directed by the ACHCSA to perform further site characterization and site monitoring. Taber Consultants has prepared a *Continuing Site Investigation Work Plan* for the City of Paris Cleaners that will improve understanding of soil and groundwater impacts at the site. Site investigation history, further site investigation, wellhead elevation resurvey, and a soil vapor investigation will form the basis for development of a Site Conceptual Model. Upon approval of the Work Plan by ACHCSA, Taber Consultants will obtain necessary permits and perform the necessary work at the City of Paris Cleaners site.

In August, 2010, Taber Consultants will gather monitoring data for the Second Semiannual Groundwater Monitoring Report for 2010. Taber Consultants will compile that monitoring data with historical data to evaluate trends at the site in order to plan remedial activities with 60 days of obtaining the samples.



4.0 CONCLUSIONS AND RECOMMENDATIONS

In March, 2010, Taber Consultants changed to the HydraSleeve[®] no-purge sampling protocol. All tested analytes remained below minimum laboratory detection limits in W-IND.

Sparger Laboratory has noted that the groundwater samples at the site produce non-typical chromatographs in the TPH-G range. Stoddard Solvent is composed of 30-50% linear and branched alkanes, 30-40% cycloalkanes, and 10-20% aromatic hydrocarbons; typical hydrocarbon chains range from C7 through C12 in length. Linear alkanes are readily degraded by soil microorganisms, while cycloalkanes and branched alkanes may be more or less readily degraded depending on location of side chains. The aromatic species of aged TPH-SS would therefore be concentrated in the system as the more readily degraded carbon chains are mineralized to CO₂ and water. Although individual TPH-G mixtures are variable due to source of crude oil, refining process and product specification, aged TPH-SS would likely appear in the TPH-G range since a general hydrocarbon distribution for TPH-G consists of 4-8% alkanes, 2-5% alkenes, 25-40% isoalkanes, 3-7% cycloalkanes, 1-4% cycloalkenes, and 20-50% aromatics, while hydrocarbon chain lengths range from C4 through Cl2.

Additionally, no source of TPH-G has been identified at the site, neither through use at the City of Paris Cleaners nor from neighboring sources. Therefore, Taber Consultants has concluded that the apparent TPH-G concentrations at the site are artifacts of TPH-SS degradation.

Concentrations of TPH-SS in MW-1 and MW-3 groundwater samples remain far greater than the general TPH taste and odor threshold of 100 ug/L for middle distillates as defined by the San Francisco Bay Regional Water Quality Control Board. Historically, the concentrations of TPH-SS has also exceeded the groundwater nuisance and odor concerns screening level of 5,000 ug/L for TPH, and has shown neither a significant decreasing trend nor an increasing trend, suggesting that no degradation is occurring at the site.

The lateral extent of impacted groundwater continues to be concentrated in the vicinity of the former tank pit, concentrated in the northwest-southeast pattern between MW-1 and MW-2 and extending to the northeast as defined in previous off-site soil borings. The stability of concentrations of TPH-SS in groundwater appears to indicate a residual soil source area remaining on the property. The groundwater plume remains undefined both down and cross gradient from the location of the former UST's at the site. Taber Consultants believes that additional site investigation planned for the third quarter of 2010 will provide further insight regarding the lateral and vertical extent of the plume, as well as define vapor migration at the site.

Taber Consultants have noted anomalously steep gradients at the site and believe there may be issues with the wells resulting from the 2002 well redevelopment. The ACHCSA agreed in their March 10, 2009, letter that re-surveying the wells is necessary, however in light of the several-foot difference in water elevation between MW-3 and the



other monitoring wells, additional steps are likely to be necessary including well swabbing and an additional redevelopment to clear out sediment blockages.



5.0 REFERENCES

Agency for Toxic Substances and Disease Registry, Toxicological Profiles, 3. *Identity And Analysis Of Total Petroleum Hydrocarbons*, www.atsdr.cdc.gov/toxprofiles/tp123-c3.pdf. (Verified web address 6/9/2010).

California Regional Water Quality Control Board, San Francisco Bay Region, Screening For Environmental Concerns At Sites With Contaminated Soil and Groundwater, Appendix 1, 4th edition, February 2005.



6.0 REPORT DISTRIBUTION

Ms. Paulette Satterley 14601 Guadalupe Drive Rancho Murieta, CA 95683

Ms. Barbara Jakub Alameda County Health Care Services Agency 1131 Harbor Parkway, Suite 250 Alameda CA, 94502

Ms. Cherie McCaulou San Francisco Bay Regional Water Quality Control Board 1515 Clay St., Suite 1400 Oakland, CA 94612



7.0 REMARKS AND SIGNATURE

The interpretations and/or conclusions contained in this report represent our professional opinions and are based in part on information supplied by the client. These opinions are based on currently available information and were developed in accordance with currently accepted geologic, hydrogeologic, and engineering practices in Alameda County, California in 2010. Other than this, no warranty is implied or intended.

This report has been prepared solely for the use of Ms. Paulette Satterley. Any reliance on this report by third parties shall be at such parties' sole risk. The work described herein was performed under the direct supervision of the professional geologist, registered with the State of California, whose signature appears below.

We appreciate the opportunity to provide you with geologic, engineering and environmental consulting services and trust this report meets your needs. If you have any questions or concerns, please call us at (916) 371-1690.

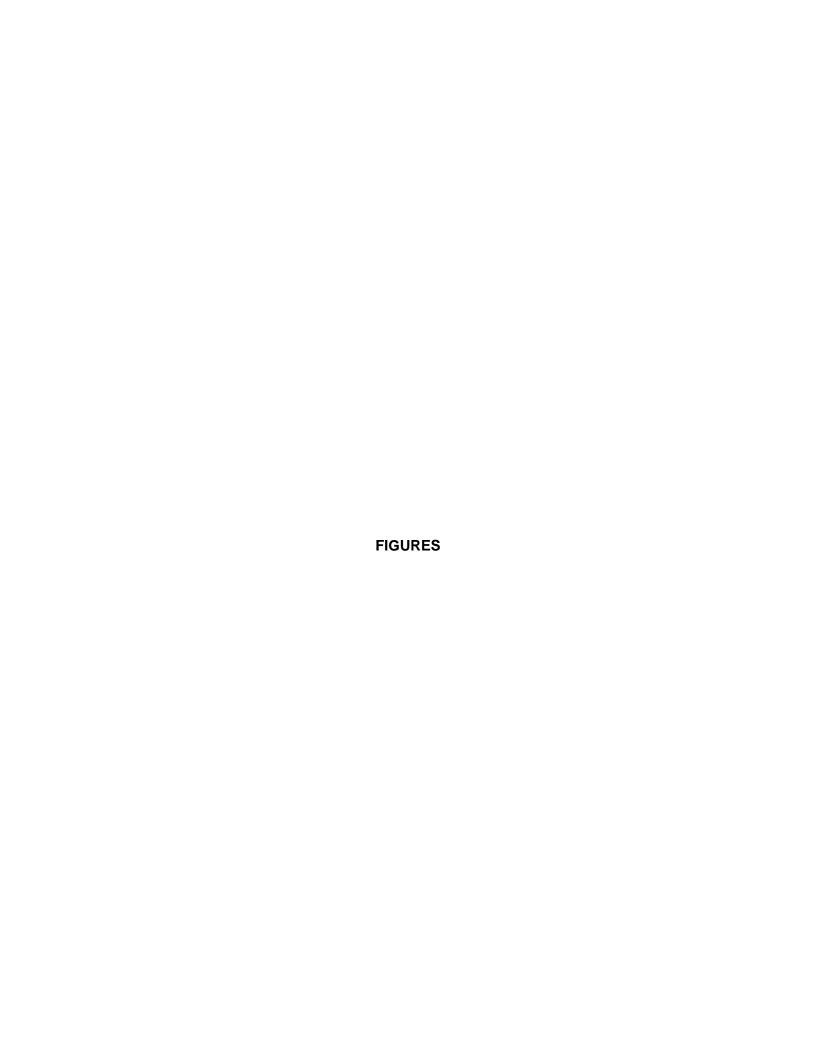
Sincerely,

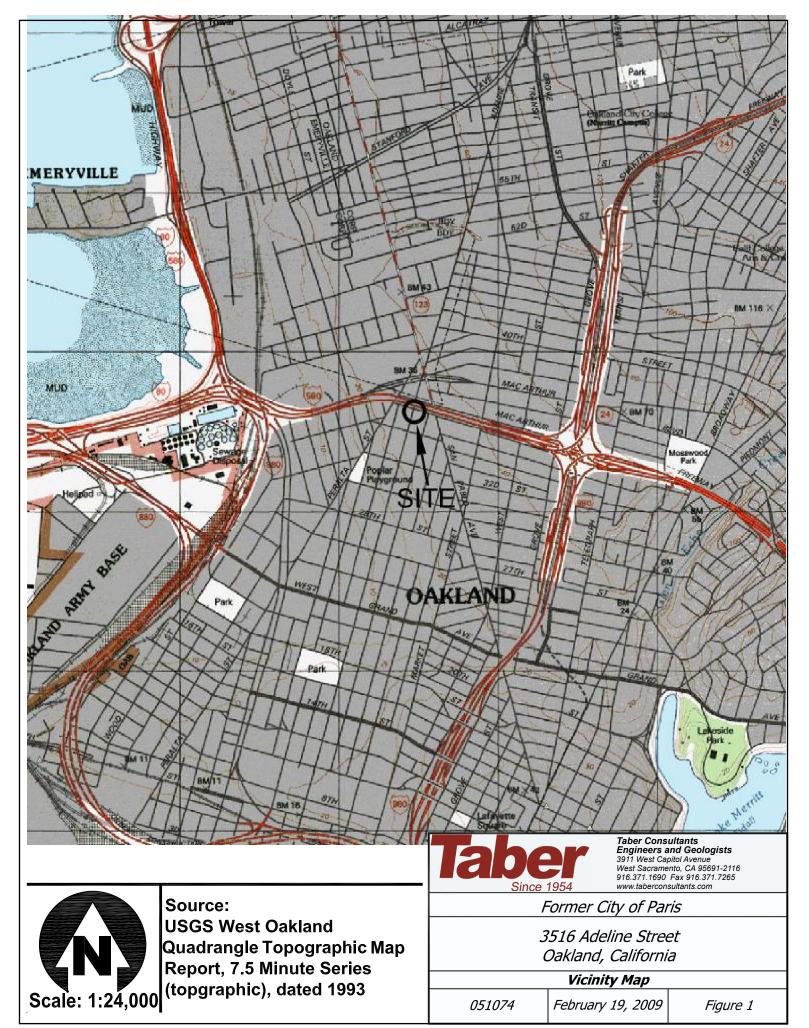
Taber Consultants

Ellen Pyatt, MSc. Project Geologist

Thomas E. Ballard, P.G. #7299

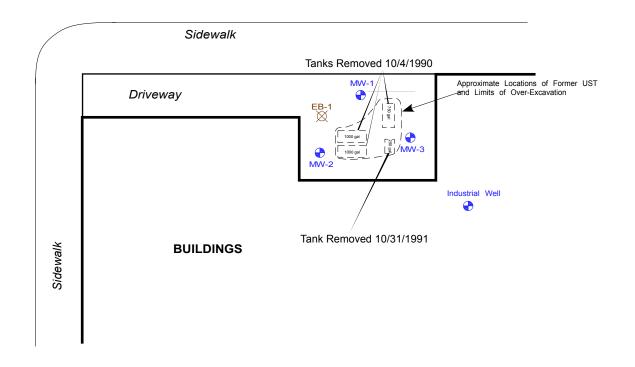
Senior Geologist

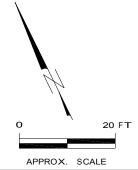




EB-2	EB-3	EB-4	EB-5	EB-6
\boxtimes	\boxtimes	\boxtimes	×	\boxtimes

35TH STREET





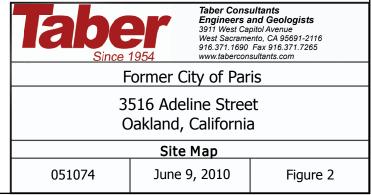


ADELINE STREET

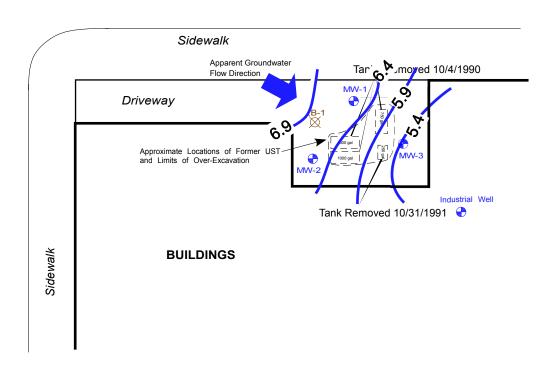


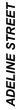
EB-1 SOIL BORING (1998)

 $\lceil \frac{ \lceil \frac{N}{N} \rceil }{ \lfloor \frac{N}{N} \rfloor } \rceil$ approximate underground storage tank locations



35TH STREET



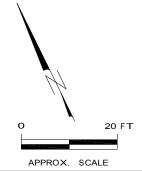


LEGEND

MW-1 GROUNDWATER MONITORING WELL

EB-1 SOIL BORING (1998)

 ${\mathbb S}^{\mathbb N}_{\mathbb R}$ APPROXIMATE UNDERGROUND STORAGE TANK LOCATIONS



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Taber Consultants Engineers and Geologists 3911 West Capitol Avenue West Sacramento, CA 95691-2116 916.371.1690 Fax 916.371.7265 www.taberconsultants.com

Former City of Paris

3516 Adeline Street Oakland, California

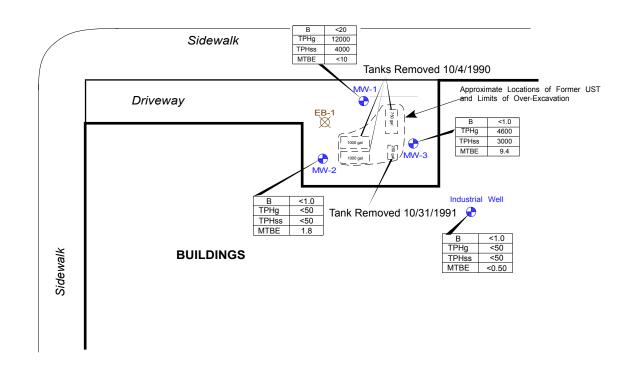
Groundwater Contours

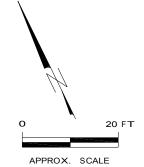
051074 March 17, 2010

Figure 3

EB-2	EB-3	EB-4	EB-5	EB-6
\boxtimes	×	×	×	\boxtimes

35TH STREET





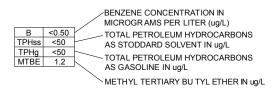


ADELINE STREET

→ MW-1 GROUNDWATER MONITORING WELL

EB-1 SOIL BORING (1998)

 ${\mathbb S}^{\mathbb N}_{\mathbb R}$ approximate underground storage tank locations





Taber Consultants Engineers and Geologists 3911 West Capitol Avenue West Sacramento, CA 95691-2116 916.371.1690 Fax 916.371.7265 www.taberconsultants.com

Former City of Paris

3516 Adeline Street Oakland, California

Groundwater Analytical Concentrations

051074 March 17, 2010

Figure 4



TABLE 1
GROUNDWATER MONITORING AND ANALYTICAL RESULTS
FIRST SEMI-ANNUAL 2010

		١	/lonitoring S	ummary	Analytical Summary						
		Top of	Depth to	Groundwater					Ethyl		
Well ID	Date	Casing	Water	Elevation	TPH-SS	TPH-G	Benzene	Toluene	benzene	Xylenes	MTBE
		-	— ft bgs		+			— ug/l —			
Groundwa	ter Sample Lo	cations									
MW-1	03/17/10	17.44	9.31	8.13	4000	12000	<20	<20	<20	20	<10
MW-2	03/17/10	17.31	8.95	8.36	<50	<50	<1	<1	<1	<1	1.8
MW-3	03/17/10	17.44	11.94	5.5	3000	4600	<10	<10	<10	<10	9.4
W-IND	03/17/10	NA	9.78		<50	<50	<1	<1	<1	<1	<0.5

Explanation:

TPHg = Total petroleum hydrocarbons as gasoline, analyzed by EPA Method 8260B.

TPH-SS = Total petroleum hydrocarbons as stoddard solvent, analyzed by the 8015B.

Benzene, toluene, ethylbenzene, and total xylenes analyzed by EPA Method 8260B.

MTBE = Methyl tertiary-butyl ether, analyzed by EPA Method 8260B.

On March 17, 2010, Taber Consultants implemented the HydraSleeve® no purge protocol for all wells.

fbg = Feet below grade.

NA = Data not available

<n = Below laboratory detection limit of n ppm.

-- = not analyzed

TABLE 2
GROUNDWATER MONITORING AND ANALYTICAL RESULTS
SUMMARY

		M	onitoring Su	ımmary			Ana	lytical Sum	mary		
		Top of	Depth to	Groundwater					Ethyl		
Well ID	Date	Casing	Water	Elevation	TPH-SS	TPH-G	Benzene	Toluene	benzene	Xylenes	MTBE
		+	— ft bgs		+			— ug/l —			*
Groundwat	er Sample Lo	cations									
MW-1	03/22/02	17.44	8.97	8.47	11000						<5.0
MW-1	04/15/03	17.44	9.23	8.21	3900		<2.5	<2.5	<2.5	3	9
MW-1	03/26/04	17.44	10.32	7.12	30000	24000	<50	<50	<50	<50	<500
MW-1	09/30/04	17.44	11.53	5.91	3800	2600	<0.5	<0.5	<0.5	2.7	<5
MW-1	09/09/05	17.44	13.63	3.81	15000	11000	<5	<5	<5	15	<50
MW-1	11/30/07	17.44	13.95	3.49							
MW-1	12/20/07	17.44	11.51	5.93	45000	110000	20	50	20	100	<5
MW-1	05/23/08	17.44	14.14	3.3	4200	<500	<1	<1	<1	20	< 0.50
MW-1	08/12/08	17.44	13.78	3.66	4000	12000	<1	<1	<1	<1	< 0.50
MW-1	12/18/08	17.44	10.71	6.73	9900	2700	<1	<1	<1	<1	< 0.50
MW-1	02/19/09	17.44	8.91	8.53	500	3100	<10	<10	<10	<10	<5
MW-1	08/11/09	17.44	13.35	4.09	13000	7800	<10	<10	<10	<10	5.9
MW-1 NP	08/11/09	17.44	13.35	4.09	6000	10000	<10	<10	<10	<10	<5
MW-1	03/17/10	17.44	9.31	8.13	4000	12000	<20	<20	<20	20	<10
MW-2	03/22/02	17.31	8.82	8.49	170	13000	410	1000	210	1100	<5.0
MW-2	04/15/03	17.31	8.52	8.79	99		<0.5	<0.5	<0.5	0.76	10
MW-2	03/26/04	17.31	9.32	7.99	120	93	<0.5	<0.5	<0.5	0.76	5.4
MW-2	09/30/04	17.31	11.62	5.69	<50	<50	<0.5	<0.5	<0.5	<0.5	<5
MW-2	09/09/05	17.31	12.75	4.56	120	98	<0.5	<0.5	<0.5	<0.5	<5
MW-2	11/30/07	17.31	11.06	6.25							
MW-2	12/20/07	17.31	9.95	7.36	<50	3000	<1	1.6	<1	2.4	2.9
MW-2	05/23/08	17.31	12.46	4.85	300	1100	<1	<1	<1	<1	3.5

Supporting Document Page 6

TABLE 2
GROUNDWATER MONITORING AND ANALYTICAL RESULTS
SUMMARY

		M	onitoring Su	ımmary			Ana	lytical Sum	mary		
		Top of	Depth to	Groundwater				•	Ethyl		
Well ID	Date	Casing	Water	Elevation	TPH-SS	TPH-G	Benzene	Toluene	benzene	Xylenes	MTBE
		-	— ft bgs	→	+			— ug/l —			—
MW-2	08/12/08	17.31	12.08	5.23	2200	350	<1	<1	<1	<1	<0.50
MW-2	12/18/08	17.31	10.58	6.73	300	<50	<1	<1	<1	<1	7.3
MW-2	02/19/09	17.31	8.22	9.09	300	300	<1	<1	<1	<1	3.4
MW-2	08/11/09	17.31	13.00	4.31	600	610	<1	<1	<1	<1	3.8
MW-2	03/17/10	17.31	8.95	8.36	<50	<50	<1	<1	<1	<1	1.8
MW-3	03/22/02	17.44	10.97	6.47	420	<50	<0.5	<0.5	<0.5	<0.5	31
MW-3	04/15/03	17.44	8.31	9.13	2700		<0.5	<0.5	<0.5	<0.5	40
MW-3	03/26/04	17.44	8.61	8.83	2700	1900	<1.7	<1.7	<1.7	4.3	<17
MW-3	09/30/04	17.44	11.1	6.34	3900	2600	<0.5	<0.5	<0.5	3.2	<10
MW-3	09/09/05	17.44	13.75	3.69	4000	2600	<0.5	<0.5	0.57	2.7	12
MW-3	11/30/07	17.44	13.9	3.54							
MW-3	12/20/07	17.44	10.79	6.65	18000	12000	<1	1.6	1.1	2.4	9.2
MW-3	05/23/08	17.44	15.2	2.24	900	3000	<1	<1	<1	<1	9.1
MW-3	08/12/08	17.44	14.14	3.3	1900	4300	<1	<1	<1	<1	6.5
MW-3	12/18/08	17.44	12.53	4.91	5000	610	<1	1	<1	<1	20
MW-3	02/19/09	17.44	11.11	6.33	1500	1300	<1	1	<1	<1	9
MW-3	08/11/09	17.44	15.22	2.22	1000	2200	<10	<10	<10	<10	7.3
MW-3 NP	08/11/09	17.44	15.22	2.22	3000	<i>6700</i>	<10	<10	<10	<10	<5
MW-3	03/17/10	17.44	11.94	5.5	3000	4600	<10	<10	<10	<10	9.4
W-IND	03/22/02	NA			<50	190	<0.5	<0.5	<0.5	0.8	<5.0
W-IND	04/15/03	NA									
W-IND	03/26/04	NA			500	200	<0.5	<0.5	<0.5	<0.5	<5

TABLE 2
GROUNDWATER MONITORING AND ANALYTICAL RESULTS
SUMMARY

		М	onitoring Su	ımmary	Analytical Summary						
		Top of	Depth to	Groundwater					Ethyl		
Well ID	Date	Casing	Water	Elevation	TPH-SS	TPH-G	Benzene	Toluene	benzene	Xylenes	MTBE
← ft bgs →				-			— ug/l —				
W-IND	09/30/04	NA			<50	<50	<0.5	<0.5	<0.5	<0.5	<5
W-IND	09/09/05	NA			<50	<50	<0.5	<0.5	<0.5	<0.5	<5
W-IND	11/30/07	NA	12.92								
W-IND	12/20/07	NA	11.68		<50	500	<1	1	<1	2.2	<.50
W-IND	05/23/08	NA	12.72		300	250	<1	3.7	<1	2.4	< 0.50
W-IND	08/12/08	NA	13.42		<50.0	<50.0	<1	<1	<1	<1	< 0.50
W-IND	12/18/08	NA	12.65		<50	<50	<1	<1	<1	<1	0.7
W-IND	02/19/09	NA	9.74		<50	<50	<1	<1	<1	<1	<0.5
W-IND	08/11/09	NA	14.13		<50	<50	<1	<1	<1	<1	<0.5
W-IND	03/17/10	NA	9.78		<50	<50	<1	<1	<1	<1	<0.5

Explanation:

TPHg = Total petroleum hydrocarbons as gasoline, analyzed by EPA Method 8260B.

TPH-SS = Total petroleum hydrocarbons as stoddard solvent, analyzed by the 8015B.

Benzene, toluene, ethylbenzene, and total xylenes analyzed by EPA Method 8260B.

MTBE = Methyl tertiary-butyl ether, analyzed by EPA Method 8260B.

NP = HydraSleeve® no purge protocol

On March 17, 2010, Taber Consultants implemented the HydraSleeve® no purge protocol for all wells.

fbg = Feet below grade.

NA = Data not available

<n = Below laboratory detection limit of n ppm.

-- = not analyzed

APPENDIX A FIELD DATA SHEETS

Taber Consultants Groundwater/Liquid Level Data (Measurements in Feet)

Project Address:	City of Paris Cleaners	Date: 3/1-/10
	3516 Adeline Street	
	Oakland, CA.	Project: 51074
		12 50 6

Recorded by:

No Yunge Sangling

Hydra Slieue Sangling

							1170001 00	-cyp - rayyoung
Well No.	Time	Well Elev.	Depth to	Measured	Groundwater	Depth to	Product	Comments
		TOC	Groundwater	Total Depth	Elevation	itychu sliseva	Thickness	
						DESCRIPTION TIME	SAMPLA	
MW-1	10:15		9,31	27,30		10:30	11:20	Sample Vilenex: 4 Vons: 1-500ml
mw-2			8,95	29,48		10:20	11:00	Fragh Velyag: 4 Vors, 1-500mC
MW-3	10:19		11.94	29.70		10:25	11:15	Fragle Volume: 4 Vons, 1-500mC Fragle Volume: 4 Vons, 1-500mC Fragle Volum: 44 PAS, 1-500ml
INDW	09:55		9,78	58.37		10:15	10:50	Somple Volum: 440As, 1-500 ml
								,
		à						

Notes: Sampled with ILITER Hydron StrevES.

APPENDIX B LABORATORY ANALYTICAL RESULTS





Tom Ballard Taber Consultants 3911 West Capitol Ave. West Sacramento, CA 95691

Client Taber Consultants

Workorder 19242 NoPurge_CityOfP

Received 03/17/10

The samples were received in EPA specified containers. The samples were transported and received under documented chain of custody and stored at four (4) degrees C until analysis was performed.

Sparger Technology, Inc. ID Suffix Keys - These descriptors will follow the Sparger Technology, Inc. ID numbers and help identify the specific sample and clarify the report.

DUP - Matrix Duplicate

MS - Matrix Spike

MSD - Matrix Spike Duplicate

LCS - Lab Control Sample

LCSD - Lab Control Sample Duplicate

RPD - Relative Percent Difference

QC - Additional Quality Control

DIL - Results from a diluted sample

ND - None Detected

RL - Reporting Limit

Note: In an effort to conserve paper, the results are printed on both sides of the paper.

Ray James

Laboratory Director

Tom Ballard Taber Consultants 3911 West Capitol Ave. West Sacramento, CA 95691

Workorder 19242

Enclosed are the results from samples received on March 17, 2010.

The requested analyses are listed below.

SAMPLE	SAMPLE DESCRIPTION	DATE COLLECTED	TEST METHOD
19242001	MW-1, Water	03/17/10	8015B TEPH 8015B TPHgas 8260B BTEX/FOC
19242002	MW-2, Water	03/17/10	8015B TEPH 8015B TPHgas 8260B BTEX/FOC
19242003	MW-3, Water	03/17/10	8015B TEPH 8015B TPHgas 8260B BTEX/FOC
19242004	W-IND, Water	03/17/10	8015B TEPH 8015B TPHgas 8260B BTEX/FOC



Environmental Laboratories

Test Certificate of Analysis

Client ID	Taber Consultants						
Workorder #	19242		Woı	rkorder II	NoPurge_City	OfP	
Laboratory ID	19242001		Sam	pled	03/17/10		
Sample ID	MW-1		Rec	eived	03/17/10		
Matrix	Water		Rep	orted	04/02/10		
8015B TPH D Parameter	iesel	Method	Prep Date	Analyzed	Result	RL Units	Dilution
Stoddard Solvent		8015B TEPH	03/19/10	03/31/1	0 4000	50.0 ug/L	1:1
Laboratory ID	19242001		Sam	pled	03/17/10		
Sample ID	MW-1		Rec	eived	03/17/10		
Matrix	Water		Rep	orted	04/02/10		
8015B TPH G Parameter	as	Method	Prep Date	Analyzed	Result	RL Units	Dilution
\mathtt{TPHgas}^1		8015B TPHgas	03/18/10	03/18/1	0 12000	500 ug/L	1:10
Surrogates		Result I	Recovery L	imits			

1 - Non-typical TPH pattern present in gas range.

Trifluorotoluene

Laboratory ID	19242001			San	npled (03/17/10		
Sample ID	MW-1			Rec	eived (03/17/10		
Matrix	Water			Rep	orted (04/02/10		
8260B Oxygen Parameter	ates	Method		Prep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-	outyl-ether	8260B	BTEX/FOC	03/25/10	03/25/10	ND	10 ug/L	1:20
Benzene		8260B	BTEX/FOC	03/25/10	03/25/10	ND	20 ug/L	1:20
Toluene		8260B	BTEX/FOC	03/25/10	03/25/10	ND	20 ug/L	1:20
Ethylbenzene		8260B	BTEX/FOC	03/25/10	03/25/10	ND	20 ug/L	1:20
Xylene,Total		8260B	BTEX/FOC	03/25/10	03/25/10	20	20 ug/L	1:20

110 %

(65 - 135)

SurrogatesResultRecoveryLimits1,2-Dichloroethane-d453 ug/L106 %(65 - 135)

22 ug/L



Environmental Laboratories

Test Certificate of Analysis

Client ID Workorder #	Taber Consultants 19242			Workorder II	D NoPurge_City	OfP	
Laboratory ID Sample ID Matrix	19242002 MW-2 Water			Sampled Received Reported	03/17/10 03/17/10 04/02/10		
8015B TPH Di Parameter	esel	Method	Prep Da	ite Analyzed	Result	RL Units	Dilution
Stoddard Solv	vent	8015B TEPH	03/19/	10 03/31/1	LO ND	50.0 ug/L	1:1
Laboratory ID Sample ID Matrix	19242002 MW-2 Water			Sampled Received Reported	03/17/10 03/17/10 04/02/10		
8015B TPH Ga Parameter	18	Method	Prep Da	te Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPHgas	03/18/	10 03/18/1	LO ND	50 ug/L	1:1
Surrogates Trifluorotolu	ıene		Recovery	Limits (65 - 13	35)		
Laboratory ID Sample ID Matrix	19242002 MW-2 Water			Sampled Received Reported	03/17/10 03/17/10 04/02/10		
8260B Oxygen Parameter	ates	Method	Prep Da	ite Analyzed	l Result	RL Units	Dilution
Methyl-tert-k Benzene Toluene Ethylbenzene Xylene,Total	outyl-ether	8260B BTEX/FO 8260B BTEX/FO 8260B BTEX/FO 8260B BTEX/FO 8260B BTEX/FO	C 03/25/ C 03/25/ C 03/25/	10 03/25/1 10 03/25/1 10 03/25/1	LO ND LO ND LO ND	0.50 ug/L 1.0 ug/L 1.0 ug/L 1.0 ug/L 1.0 ug/L	1:1 1:1 1:1 1:1 1:1
Surrogates 1,2-Dichloroe	ethane-d4		Recovery	Limits (65 - 13	35)		
Laboratory ID Sample ID Matrix	19242003 MW-3 Water			Sampled Received Reported	03/17/10 03/17/10 04/02/10		
8015B TPH Di Parameter	esel	Method	Prep Da	ite Analyzed	Result	RL Units	Dilution
Stoddard Solv	vent	8015B TEPH	03/19/	10 03/31/1	LO 3000	50.0 ug/L	1:1

Certification No. 1614



Environmental Laboratories

Stoddard Solvent

Test Certificate of Analysis

Client ID Workorder #	Taber Consultants 19242			W	orkorder ID	NoPurge_City(OfP	
Laboratory ID Sample ID Matrix	19242003 MW-3 Water			Re	mpled ceived ported	03/17/10 03/17/10 04/02/10		
8015B TPH Garameter	as	Method	Pı	rep Date	Analyzed	Result	RL Units	Dilution
$\mathtt{TPHgas}^{^{1}}$		8015B T	PHgas 0	3/18/10	03/18/1	0 4600	50 ug/L	1:1
Surrogates		Result	Reco	very	Limits			
Trifluorotol	ıene	23 ug/L	115	용	(65 - 135	5)		
	I pattern present in gas :	range.						
Laboratory ID	19242003			Sa	mpled	03/17/10		
Sample ID	MW-3				ceived	03/17/10		
Matrix	Water			Re	ported	04/02/10		
8260B Oxygen Parameter	ates	Method	P	rep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-l	outyl-ether	8260B B	rex/foc 0:	3/25/10	03/25/1	0 9.4	5.0 ug/L	1:10
Benzene		8260B B	rex/foc 0	3/25/10	03/25/1	0 ND	10 ug/L	1:10
Toluene		8260B B	rex/foc 0:	3/25/10	03/25/1	0 ND	10 ug/L	1:10
Ethylbenzene		8260B B	rex/foc 0	3/25/10	03/25/1	0 ND	10 ug/L	1:10
Xylene,Total		8260B B	rex/foc 0:	3/25/10	03/25/1	0 ND	10 ug/L	1:10
Surrogates		Result	Reco	0	Limits			
1,2-Dichloro	ethane-d4	50 ug/L	100	४	(65 - 135	5)		
Laboratory ID	19242004			Sa	mpled	03/17/10		
Sample ID	W-IND			Re	ceived	03/17/10		
Matrix	Water			Re	ported	04/02/10		
8015B TPH Di Parameter	esel	Method	P	rep Date	Analyzed	Result	RL Units	Dilution

03/19/10 03/31/10

ND

50.0 ug/L

1:1

8015B TEPH



Environmental Laboratories

1,2-Dichloroethane-d4

Test Certificate of Analysis

Client ID Workorder #	Taber Consultants 19242		W	orkorder ID	NoPurge_City	OfP	
Laboratory ID	19242004		Sa	mpled	03/17/10		
Sample ID	W-IND		R	eceived	03/17/10		
Matrix	Water		R	eported	04/02/10		
8015B TPH Garameter	as	Method	Prep Date	Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPH	gas 03/18/10	0 03/18/10) ND	50 ug/L	1:1
Surrogates		Result	Recovery	Limits			
Trifluorotol	uene	21 ug/L	105 %	(65 - 135)		
Laboratory ID	19242004		Sa	mpled	03/17/10		
Sample ID	W-IND		R	eceived	03/17/10		
Matrix	Water		R	eported	04/02/10		
8260B Oxygen Parameter	ates	Method	Prep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-	butyl-ether	8260B BTE	K/FOC 03/25/10	03/25/10) ND	0.50 ug/L	1:1
Benzene		8260B BTE	K/FOC 03/25/10	03/25/10) ND	1.0 ug/L	1:1
Toluene		8260B BTE	K/FOC 03/25/10	03/25/10) ND	1.0 ug/L	1:1
Ethylbenzene		8260B BTE	K/FOC 03/25/10	0 03/25/10) ND	1.0 ug/L	1:1
Xylene,Total		8260B BTE	K/FOC 03/25/10	0 03/25/10) ND	1.0 ug/L	1:1
Surrogates		Result	Recovery	Limits			

96 % (65 - 135)

48 ug/L



Method Blank Report

Client ID Laboratory ID	Taber Consultants 94507			Sample ID Matrix	MB for HBN 3 Water	83260 [SGXV/2646]	
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Stoddard Sol	vent	8015B TEPH	03/19/10	03/31/10	ND	50.0 ug/L	1:1
		Lal	Control San				
Client ID Laboratory ID	Taber Consultants 94508			Sample ID Matrix	LCS for HBN 3 Water	383260 [SGXV/2646	·]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Stoddard Sol	vent	8015B TEPH	03/19/10	03/31/10	1010	50.0 ug/L	1:1
		Lab Co	ntrol Sample	Duplicate Rep	ort		
Client ID Laboratory ID	Taber Consultants 94509			Sample ID Matrix	LCSD for HBN Water	I 383260 [SGXV/264	16
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Stoddard Sol	vent	8015B TEPH	03/19/10	03/31/10	1120	50.0 ug/L	1:1
		N	Method Blank	•			
Client ID Laboratory ID	Taber Consultants 94517			Sample ID Matrix	MB for HBN 3 Water	83359 [VGXV/3058]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPHgas	03/18/10	03/18/10	ND	50 ug/L	1:1
Surrogates Trifluorotol	uene	Result 24 ug/L	Recovery	Limits (65 – 1	135)		
		Lal	o Control San				
Client ID Laboratory ID	Taber Consultants 94518			Sample ID Matrix	LCS for HBN 3 Water	383359 [VGXV/3058	3]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPHgas	03/18/10	03/18/10	988	50 ug/L	1:1



Environmental Laboratories

Lab Control Sample Duplicate Report

Client ID Laboratory ID	Taber Consultants 94519			Sample ID Matrix	LCSD for HBN Water	1 383359 [VGXV/3	8058
Laboratory ID	94519			Matrix	water		
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPHgas	03/18/10	03/18/10	1030	50 ug/L	1:1
		N	Matrix Spike	Report			
Client ID Laboratory ID	Taber Consultants 94520			Sample ID Matrix	MS for HBN 38 Water	83359 [VGXV/305	8]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPHgas	03/18/10	03/18/10	1110	50 ug/L	1:1
		Matr	ix Spike Dupl	licate Report			
Client ID Laboratory ID	Taber Consultants 94521			Sample ID Matrix	MSD for HBN Water	383359 [VGXV/30	058]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
TPHgas		8015B TPHgas	03/18/10	03/18/10	1100	50 ug/L	1:1
		N	Aethod Blank	Report			
Client ID Laboratory ID	Taber Consultants 94522			Sample ID Matrix	MB for HBN 3 Water	83362 [VMXV/32	37]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-k	outyl-ether	8260B BTEX/FC	C03/25/10	03/25/10	ND	0.50 ug/L	1:1
Benzene		8260B BTEX/FO			ND	1.0 ug/L	1:1
Toluene		8260B BTEX/FC			ND	1.0 ug/L	1:1
Ethylbenzene		8260B BTEX/FC			ND	1.0 ug/L	1:1
Xylene,Total		8260B BTEX/FC	C03/25/10	03/25/10	ND	1.0 ug/L	1:1
Surrogates		Result	Recovery		0.5.)		
1,2-Dichloroe	ethane-d4	49 ug/L	98 %	(65 – 1	135)		
		Lab	Control San				
Client ID Laboratory ID	Taber Consultants 94523			Sample ID Matrix	LCS for HBN 3 Water	383362 [VMXV/32	237]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-k	outyl-ether	8260B BTEX/FO	C03/25/10	03/25/10	55	0.50 ug/L	1:1
Benzene		8260B BTEX/FC	C03/25/10	03/25/10	55	1.0 ug/L	1:1



Lab Control Sample Report

Client ID	Taber Consultants			Sample ID		383362 [VMXV/32	237]
Laboratory ID	94523			Matrix	Water		
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
(continued)							
Toluene		8260B BTE	X/FOC03/25/10	03/25/10	54	1.0 ug/L	1:1
Ethylbenzene		8260B BTE	X/FOC03/25/10	03/25/10	55	$1.0 \mathrm{ug/L}$	1:1
Xylene,Total		8260B BTE	X/FOC03/25/10	03/25/10	164	1.0 ug/L	1:1
		La	b Control Sample	Duplicate Repo	ort		
Client ID Laboratory ID	Taber Consultants 94524			Sample ID Matrix	LCSD for HBN Water	I 383362 [VMXV/:	3237
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-b	outyl-ether	8260B BTE	X/FOC03/25/10	03/25/10	61	0.50 ug/L	1:1
Benzene		8260B BTE	X/FOC03/25/10	03/25/10	59	$1.0~{ m ug/L}$	1:1
Toluene		8260B BTE	X/FOC03/25/10	03/25/10	58	$1.0~{ m ug/L}$	1:1
Ethylbenzene			X/FOC03/25/10		59	1.0 ug/L	1:1
Xylene,Total		8260B BTE	X/FOC03/25/10	03/25/10	177	1.0 ug/L	1:1
			Matrix Spike	Report			
Client ID Laboratory ID	Taber Consultants 94525			Sample ID Matrix	MS for HBN 33 Water	83362 [VMXV/323	37]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Methyl-tert-b	outyl-ether	8260B BTE	X/FOC03/25/10	03/25/10	57	0.50 ug/L	1:1
Benzene		8260B BTE	X/FOC03/25/10	03/25/10	56	$1.0 \mathrm{ug/L}$	1:1
Toluene		8260B BTE	X/FOC03/25/10	03/25/10	55	$1.0~{ m ug/L}$	1:1
Ethylbenzene			X/FOC03/25/10		55	1.0 ug/L	1:1
Xylene,Total		8260B BTE	X/FOC03/25/10	03/25/10	160	1.0 ug/L	1:1
			Matrix Spike Dup				
Client ID Laboratory ID	Taber Consultants 94526			Sample ID Matrix	MSD for HBN Water	383362 [VMXV/3	237]
Parameter		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Methyl_tert_h	outyl-ether	8260B BTE	X/FOC03/25/10	03/25/10	58	0.50 ug/L	1:1
MCCHYL CCLC L							
Benzene		8260B BTE	X/FOC03/25/10	03/25/10	55	$1.0~{ m ug/L}$	1:1
			X/FOC03/25/10 X/FOC03/25/10		55 54	1.0 ug/L 1.0 ug/L	1:1 1:1



Matrix Spike Duplicate Report

Client ID Laboratory ID	Taber Consultants 94526			Sample ID Matrix	MSD for HBN 3 Water	383362 [VMXV/32	237]
Parameter (continued)		Method	Prep Date	Analyzed	Result	RL Units	Dilution
Xylene,Total		8260B BTEX	/FOC03/25/10	03/25/10	155	1.0 ug/L	1:1



Environmental Laboratories

QC SUMMARY

LITVIIOTIT	ichtal Laboratories		QC SUMMA	KY				
Client ID	Taber Consultants		Origin	al 19242002	2			
QC Batch	VGX 3178	Samples Matrix Spike [94520]						
Matrix	Water			Matrix S	pike Duplicate	[94521]		
Parameter TPHgas		Spike %Recovery	Spike Dup %Recovery 110	Recovery Limits (65-135)	RPD 0.90	RPD Limits (20 MAX)		
Client ID	Taber Consultants		Origin	nal 19242002	2			
QC Batch	VMX 3277		Sampl		pike [94525]			
Matrix	Water		Sump		pike Duplicate	[94526]		
		Spike	Spike Dup	Recovery		RPD		
Parameter		%Recovery	%Recovery	Limits	RPD	Limits		
	-butyl-ether	110	112	(65-135)	1.8	(20 MAX)		
Benzene		112	110	(65-135)	1.8	(20 MAX)		
Toluene		110	108	(65-135)	1.8	(20 MAX)		
Ethylbenzer	ne	110	108	(65-135)	1.8	(20 MAX)		
Xylene,Tota		107	103	(65-135)	3.8	(20 MAX)		
Client ID	Taber Consultants	Samples Lab Control Sample [94508]						
QC Batch	SGX 2677		Lab Control Sample Duplicate [9450					
Matrix	Water				_			
		Check	Check Dup	Recovery		RPD		
Parameter		%Recovery	%Recovery	Limits	RPD	Limits		
Stoddard Sc	olvent	101	112	(65-135)	10	(20 MAX)		
Client ID	Taber Consultants	Samples Lab Control Sample [94518]						
QC Batch Matrix	VGX 3178 Water			Lab Cont	rol Sample Du	uplicate [94519]		
-++		Check	Check Dup	Recovery		RPD		
Parameter		%Recovery	%Recovery	Limits	RPD	Limits		
ГРНgas		99	103	(65-135)	4.0	(20 MAX)		
Client ID	Taber Consultants	Samples Lab Control Sample [94523]						
QC Batch Matrix	VMX 3277 Water	Lab Control Sample Duplicat				uplicate [94524]		
		Check	Check Dup	Recovery		RPD		
Parameter		%Recovery	%Recovery	Limits	RPD	Limits		
Methyl-tert	-butyl-ether	110	122	(65-135)	10	(20 MAX)		
- Benzene		110	118	(65-135)	7.0	(20 MAX)		
Jenzene								
		108	116	(65-135)	7.1	(20 MAX)		
Toluene Ethylbenzer	ne	108 110	116 118	(65-135) (65-135)	7.1 7.0	(20 MAX) (20 MAX)		