McMORGAN
& COMPANY
INVESTMENT MANAGEMENT

July 12, 2005

Mr. Barney M. Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-9335

Subject: 444 Hegenberger Loop, Oakland, CA 94621
Fuel Leak Case RO00000184

Dear Mr. Chan:

Enclosed is the most recent groundwater monitoring report for the captioned property for your review and comments. The report concludes that the concentrations do not indicate a significant impact to groundwater. I understand you've discussed this report with our consultant, ACC Environmental.

I also understand that ACC will be working on additional information you've requested and will forward that information under separate cover. We would, with your concurrence, like to proceed with a Work Plan to prepare for site closure in the near future.

We do appreciate your assistance in this complex matter and look forward to a successful site closure.

Sincerely,

Mary L. Schroeder
Vice President

cc: Patrick G. Murray, McMorgan & Company LLC (with enclosure)
David R. DeMent, ACC Environmental Consultants (without enclosure)

One Bush Street, Suite 800 · San Francisco, California 94104
Web: www.mcmorgan.com Phone: (415) 788-9300 Fax: (415) 616-9300

A·C·C
ENVIRONMENTAL
CONSULTANTS

June 13, 2005

The Bank of New York Trust Company, N.A. as Corporate Co-Trustee for
Carpenters Pension Trust Fund for Northern California; Northern California Carpenters PTF, LLC
c/o Ms. Mary Schroeder, McMorgan & Company LLC
One Bush Street, Suite 800
San Francisco, California 94104

RE: May 2005 Groundwater Monitoring Report
444 Hegenberger Loop, Oakland, California
ACC Project No.6748-017.00

Dear Ms. Schroeder:

Enclosed is the report describing the groundwater monitoring activities conducted in all monitoring wells at 444 Hegenberger Loop, Oakland, California. ACC recommends that you submit a copy of the report directly to the Alameda County Health Care Services Agency with your cover letter.

Mr. Barney Chan
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

If you have any questions regarding the report, please contact me at (510) 638-8400, ext. 109.

Sincerely,

David R. DeMent, PG, REA II
Environmental Division Manager

/trb:drd

Enclosures

Northern California: 7977 Capwell Drive, Suite 100 • Oakland, CA 94621 • (510) 638-8400 • Fax (510) 638-8404
Southern California: 1541 Wilshire Blvd., Suite 516, Los Angeles, CA 90017 • (213) 353-1240 • Fax (213) 353-1244

A·C·C
ENVIRONMENTAL
CONSULTANTS

MAY 2005 GROUNDWATER MONITORING REPORT

Subject Property
444 Hegenberger Loop
Oakland, California

ACC Project No.6748-017.00

Prepared for:

The Bank of New York Trust Company, N.A. as Corporate Co-Trustee for
Carpenters Pension Trust Fund for Northern California; Northern California Carpenters PTF, LLC
c/o Ms. Mary Schroeder, McMorgan & Company LLC
One Bush Street, Suite 800
San Francisco, California 94104

May 25, 2005

Prepared By: _____
Trevor Bausman
Project Administrator

Reviewed By: _____
David DeMent, PG, REA II
Environmental Division Manager

REGISTERED GEOLOGIST
DAVID R. DEMENT
NO. 5974
STATE OF CALIFORNIA

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Southern California: 1541 Wilshire Blvd., Suite 516, Los Angeles, CA 90017 • (213) 353-1240 • Fax (213) 353-1244

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MAY 2005 GROUNDWATER MONITORING REPORT

444 Hegenberger Loop
Oakland, California

1.0 INTRODUCTION

This May 2005 Groundwater Monitoring Report was prepared by ACC Environmental Consultants, Inc., (ACC) at the request of McMorgan & Company LLC on behalf of The Bank of New York Trust Company, N.A. as Corporate Co-Trustee for Carpenters Pension Trust Fund for Northern California; Northern California Carpenters PTF. Work was performed at the subject property located at 444 Hegenberger Loop, Oakland, California (Site). The project objectives were to: 1) measure the groundwater levels in each well and calculate the groundwater elevation, gradient, and flow direction; 2) obtain representative water samples from the seven existing groundwater monitoring wells and analyze the water samples for petroleum hydrocarbon constituents as gasoline and/or diesel; and 3) report the findings.

The general goal of this groundwater monitoring and sampling event was to determine current groundwater conditions, evaluate the changes in concentrations of constituents of concern, and obtain current groundwater quality data to further develop a Conceptual Site Model (CSM).

2.0 BACKGROUND

The Site is located at 444 Hegenberger Loop in the southeast corner of the intersection of Hegenberger Road and Hegenberger Loop. The rectangular lot is approximately 250 feet long by 200 feet wide and is approximately 9 feet above mean sea level.

The available data indicate that a series of subsurface investigations have been conducted at the Site since 1997. A site assessment in April 1997 indicated the presence of petroleum hydrocarbons in soils and groundwater beneath the Site but no reportable concentrations of methyl tertiary butyl ether (MTBE). A subsequent investigation conducted in July and October 1997 confirmed previous investigation findings and that no underground storage tanks (USTs) remained at the Site.

Tetra Tech EM Inc. (Tetra Tech) installed five 2-inch-diameter groundwater monitoring wells in November 1998. The five monitoring wells were screened from 5 to 20 feet below ground surface (bgs). Well MW-1 was subsequently destroyed in December 1999 and well MW-6 was installed in the estimated downgradient direction of the former waste oil tank. Well MW-6 was screened from 10 to 20 feet bgs. In December 2000, Tetra Tech installed offsite wells MW-7 and MW-8 estimated to be in the downgradient direction of the Site. Wells MW-7 and MW-8 were screened from 5 to 20 feet bgs. Groundwater monitoring was performed periodically from December 1998 to October 2001 in the existing wells.

Tetra Tech reported the findings of a Sensitive Receptor Survey in its March 8, 2001 *Fourth Quarter Groundwater Monitoring Report, December 2000.* According to the California Department of Water resources, 40 monitoring wells and two irrigation wells were located at 11

sites within the search distance. One irrigation well is reportedly located approximately 500 feet cross gradient from the Site and a second irrigation well is located approximately 2,800 feet crossgradient of the Site.

2.1 Subsurface Conditions

Soil boring logs from wells MW-7 and MW-8, included in the March 8, 2001 *Fourth Quarter Groundwater Monitoring Report, December 2000,* indicate that clay and silty clay is present from the surface to the minimum depth of 11.5 feet bgs and sandy gravels and sands are present from approximately 12 to 15 feet bgs to 20.5 feet bgs, the total depth of the soil borings. Silty clays logged at 10 to 10.5 feet bgs are described as dry to moist, medium plasticity, and medium stiff. Sandy gravels logged from 15 to 16 feet bgs are described as saturated, coarse to fine grained sand, and fine to medium grained gravel.

The data summarized in the soil boring logs directly contradicts other conclusions presented in the March 8, 2001 *Fourth Quarter Groundwater Monitoring Report, December 2000.* In the *Subsurface Soil Conditions and Hydrology* section of the report, Tetra Tech states that "Groundwater is usually encountered within five feet bgs," and in the *Preferential Pathways* section "the utility trenches may act as preferential pathways and could allow for movement of petroleum hydrocarbons to the north and west beyond the site." Saturated permeable soils are not logged shallower than 12 feet bgs. Utility trenches in the vicinity of the Site likely exist no deeper than seven feet bgs, therefore, interception or preferential movement of groundwater along utility trenches is highly unlikely. Groundwater elevations are typically measured approximately 5 feet bgs in the monitoring wells due to semi-confined aquifer conditions.

3.0 GROUNDWATER MONITORING AND SAMPLING

ACC conducted groundwater monitoring on May 16, 2005. Work at the Site included measuring depth to water, subjectively evaluating groundwater in the wells, purging and sampling the wells, and submitting the samples to a state-certified laboratory for analysis.

3.1 Groundwater Monitoring

Before groundwater sampling, the depth to the surface of the water table was measured from the top of the polyvinyl chloride well casing using a Solinst water level meter. Based on well elevation data reported by Tetra Tech, the groundwater monitoring wells were surveyed relative to mean sea level in December 2000. ACC measured depth to water using an electronic Solinst meter and the water level measurements were recorded to the nearest 0.01 foot. Information regarding well elevations and groundwater depths is summarized in Table 1.

TABLE 1 - GROUNDWATER DEPTH INFORMATION

Well No.	Date Sampled	Well Elevation[1] (above MSL)	Depth to Groundwater	Groundwater Elevation
MW-1	12/02/98	100.74	2.90	97.84
	03/08/99		3.43	97.31
	07/01/99		3.81	96.93
	08/18/99		3.62	97.12
	09/15/99		3.69	97.05
	12/27/99		3.81	96.93
	Well Destroyed			
MW-2	12/02/98	102.44	4.61	97.83
	03/08/99		5.16	97.28
	07/01/99		5.91	96.53
	08/18/99		5.53	96.91
	09/15/99		5.55	96.89
	12/27/99		5.55	96.89
	03/24/00		5.44	97.00
	06/09/00	9.05[2]	---	FP
	12/14/00		5.00	4.05
	05/07/01		5.69	3.36
	10/04/01		5.60	3.45
	02/09/05		5.00	4.05
	05/16/05		3.98	5.07
MW-3	12/02/98	102.00	4.24	97.76
	03/08/99		4.90	97.10
	07/01/99		5.35	96.65
	08/18/99		5.21	96.79
	09/15/99		5.26	96.74
	12/27/99		5.42	96.58
	03/24/00		5.81	96.19
	06/09/00		5.43	96.57
	12/14/00	8.60[2]	4.85	3.75
	05/07/01		5.37	3.23
	10/04/01		5.27	3.33
	02/09/05		4.45	4.15
	05/16/05		3.81	4.79
MW-4	12/02/98	100.00	2.20	97.80
	03/08/99		2.80	97.20
	07/01/99		5.23	64.77
	08/18/99		5.00	95.00
	09/15/99		4.99	95.01
	12/27/99		5.23	94.77
	03/24/00		5.39	94.61
	06/09/00		5.24	94.76
	12/14/00	8.50[2]	4.60	3.90
	05/07/01		5.20	3.30
	10/04/01		5.08	3.42

Well No.	Date Sampled	Well Elevation[1] (above MSL)	Depth to Groundwater	Groundwater Elevation
	02/09/05		4.45	4.05
	05/16/05		3.98	4.52
MW-5	12/02/98	102.22	4.59	97.63
	03/08/99		5.20	97.02
	07/01/99		5.59	96.63
	08/18/99		5.37	96.85
	09/15/99		5.55	96.67
	12/27/99		5.48	96.74
	03/24/00		6.02	96.20
	06/09/00		5.59	96.63
	12/14/00	8.84[2]	5.10	3.74
	05/07/01		5.52	3.32
	10/04/01		5.45	3.39
	02/09/05		4.90	3.94
	05/16/05		3.92	4.92
MW-6	03/24/00	102.58	5.49	97.09
	06/09/00		5.87	96.71
	12/14/00	9.19[2]	5.13	4.06
	05/07/01		5.89	3.30
	10/04/01		5.71	3.48
	02/09/05		5.20	3.99
	05/16/05		3.98	5.21
MW-7	12/14/00	8.10[2]	3.48	4.62
	05/07/01		5.13	2.97
	10/04/01		4.87	3.23
	02/09/05		4.15	3.95
	05/16/05		3.79	4.31
MW-8	12/14/00	8.68[2]	5.10	3.58
	05/07/01		5.74	2.94
	10/04/01		5.52	3.16
	02/09/05		4.80	3.88
	05/16/05		3.41	5.27

Notes: All measurements in feet
[1] Well elevation measured to top of casing
[2] Well elevation relative to established City of Oakland Benchmark (feet above sea level)

3.2 Groundwater Gradient

The calculated groundwater flow direction and gradient, as determined from monitoring well data obtained on May 16, 2005, is illustrated on Figure 3. The groundwater elevation measured in well MW-8 was not used due its suspect value. Generally, revised groundwater piezometric surface contours approximate historic values and groundwater flow direction trends west-northwest. The calculated groundwater gradient averaged 0.004 foot per foot. Historical groundwater gradients and calculated flow directions are summarized in Table 2.

TABLE 2 – GROUNDWATER GRADIENT AND FLOW DIRECTION

Date Monitored	Gradient (foot/foot)	Direction
12/02/98	0.00091	West
03/08/99	0.00086	Southwest
07/01/99	0.0011	Southwest
08/18/99	0.0013	West
09/15/99	0.04089[1] 0.00125[5]	North[1] West
12/27/99	0.0010[5] 0.0489[1]	West[5] North[1]
03/29/00	0.0469[1] 0.0131[2]	Northwest West-Southwest
06/09/00	0.03[3] 0.0011[2]	North South-southwest
12/14/00	0.003[1] 0.006[4]	North North
05/07/01	0.0014 0.0025[6]	Northwest Northwest
10/04/01	0.0013 0.001[6]	Northwest Northwest
02/09/05	0.001	Southwest
05/16/05	0.004	West-Northwest

Notes:
[1] *Flow component from MW-2 to MW-4*
[2] *Flow component from MW-6 to area of MW-5*
[3] *Flow component from MW-2, MW-3, and MW-4 and from MW-6 to MW-4*
[4] *Flow component from MW-7 to MW-8*
[5] *Flow component among wells MW-2, MW-3, and MW-5*
[6] *Flow component from MW-3 to MW-7*

3.3 Groundwater Sampling

Before groundwater sampling, each well was purged using a disposable polyethylene bailer. Groundwater samples were collected after four well casing volumes of water were measured for temperature and dissolved oxygen (DO), and removed. Following purging, each well was allowed to recharge before sampling. When recovery to 80 percent of the static water level was observed, a sample was collected for analysis. Groundwater conditions monitored during purging and sampling were recorded on monitoring well worksheets, included as Appendix 1.

Wells were sampled using disposable polyethylene bailers attached to a new rope for each well. From each monitoring well, approved, laboratory-supplied sample vials were filled to overflowing and sealed to eliminate trapped air in the vial. Once filled, sample vials were inverted and tapped to test for air bubbles. Sample containers were labeled with self adhesive, preprinted tags. The samples were stored in a pre-chilled, insulated container pending delivery to STL San Francisco (STL-SF), a state-certified analytical laboratory, for analysis.

Water purged during the development and sampling of the monitoring wells was temporarily stored onsite in Department of Transportation approved 55-gallon drums pending laboratory analysis and proper disposal.

4.0 RESULTS OF GROUNDWATER SAMPLING

Groundwater samples collected from each well were submitted to STL-SF following chain of custody protocol. All groundwater samples were analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and methyl tertiary butyl ether (MTBE) by EPA Method 8260B and water samples from wells MW-2, MW-5, and MW-6 were further analyzed for total petroleum hydrocarbons as diesel (TPHd) by EPA Method 3510/8015M. A copy of the chain of custody record and laboratory analytical reports is included as Appendix 2. A summary of the groundwater results obtained from each monitoring well is presented in Table 3.

TABLE 3 - GROUNDWATER SAMPLE ANALYTICAL RESULTS

Well No.	Date Sampled	TPHd (µg/L)	TPHg (µg/L)	MTBE (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-benzene (µg/L)	Total Xylenes (µg/L)
MW-1	12/02/98	<50	<50	---	<0.05	<0.05	<0.05	<0.05
	03/08/99	190	<50	---	<0.3	<0.3	<0.3	<0.3
	07/01/99	<50	<50	---	<0.5	<0.5	<0.5	<0.5
	08/18/99	<50	3,100	---	<0.5	9.6	12	12
	09/15/99	<50	<50	---	<0.5	<0.5	<0.5	<0.5
	12/27/99	---	---	---	---	---	---	--
	Destroyed	---	---	---	---	---	---	---
MW-2	12/02/98	99	<50	---	4.6	0.85	0.57	5
	03/08/99	210	180	---	200[9]	0.74	1.3	2.3
	07/01/99	<50	1,100	---	190	13	33	36
	08/18/99	---	---	---	---	---	---	---
	09/15/99	100	990	---	330	9.7	11	19
	12/27/99	<50	1,000	---	260	7.2	1.3	10
	03/24/00	31,000	1,900	---	110	4.8	9.5	12
	06/09/00	---	---	---	---	---	---	---
	12/14/00	470	1,600	<2/20	450	18	61	26
	05/07/01	300	950	---	120	5.8	8.5	32
	10/04/01	170	370	---	55	2.8	17	4.2
	02/09/05	<50	160	<0.50	69	1.2	1.3	<1.0
	05/16/05	140	650	<0.50	96	4.7	15	7.5

Well No.	Date Sampled	TPHd (µg/L)	TPHg (µg/L)	MTBE (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-benzene (µg/L)	Total Xylenes (µg/L)
MW-3	12/02/98	300	970	---	160	6.5	16	9
	03/08/99	1,400	2,600	---	1800	30	67	26
	07/01/99	150	3,000	---	1	<0.5	32	36
	08/18/99	---	---	---	---	---	---	---
	09/15/99	110	1,100	---	350	8.3	5.4	10
	12/27/99	70	560	---	170	2.1	7.6	3.1
	03/24/00	1,000	8,400	---	4100	71	190	75
	06/09/00	320	2,700	---	1100	17	18	<10
	12/14/00	<100	710	<0.5/5	140	2.2	3.3	1.2
	05/07/01	<400	1,500	---	270	7.9	11	5.6
	10/04/01	<50	140	---	45	<0.3	1.3	<0.6
	02/09/05	---	7,700	<5.0	670	16	83	36
	05/16/05	---	7,100	<5.0	1,200	20	110	49
MW-4	12/02/98	620	<50	---	1.1	0.37	<0.3	2
	03/08/99	<50	1,300	---	1,900[10]	9.4	1.2	11
	07/01/99	<50	610	---	120	<0.5	<0.5	<0.5
	08/18/99	---	---	---	---	---	---	---
	09/15/99	59	830	---	320	6.5	1.7	<2.0
	12/27/99	<50	55	---	5.8	<0.5	<0.5	<0.5
	03/24/00	77	430	---	240	3.3	0.98	1.5
	06/09/00	<50	220	---	91	0.93	<0.5	<0.5
	12/14/00	<50	96	<0.5	15	<0..5	<0.5	<0.5
	05/07/01	<100	380	---	130	2.5	1.7	2.5
	10/04/01	<50	76	---	21	<0.3	<0.3	<0.6
	02/09/05	---	2,000	<2.5	440	12	9.3	7.6
	05/16/05	---	2,400	<2.5	610	16	11	8.0
MW-5	12/02/98	620	<50	---	1.1	0.37	<0.3	2
	03/08/99	<50	58	---	23	0.31	<0.3	1.8
	07/01/99	64	1,900	---	160	10	13	22
	08/18/99	---	---	---	---	---	---	---
	09/15/99	<50	410	---	64	2.1	1.3	2.7
	12/27/99	<50	130	---	15	0.73	<0.5	<0.5
	03/24/00	460	2,500	---	560	57	18	87
	06/09/00	140	2,600	---	770	63	15	71
	12/14/00	<50	220	<0.5/5	17	0.63	1.7	1.1
	05/07/01	<200	3,200	---	450	44	54	66
	10/04/01	<50	<50	---	3.6	<0.3	<0.3	<0.6
	02/09/05	57	1,100	0.58	160	14	50	9.6
	05/16/05	340	4,700	<10	730	79	340	36

Well No.	Date Sampled	TPHd (µg/L)	TPHg (µg/L)	MTBE (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethyl-benzene (µg/L)	Total Xylenes (µg/L)
MW-6	03/24/00	470	2,400	---	430	16	340	73
	06/09/00	<50	540	---	190	1.2	3.7	4.5
	12/14/00	<50	<50	<0.5/5	0.51	<0.5	<0.5	0.94
	05/07/01	<50	<50	---	4.4	<0.5	<0.5	<0.5
	10/04/01	<50	<50	---	<0.3	<0.3	<0.3	<0.6
	02/09/05	<50	<50	<0.50	0.94	<0.50	<0.50	<1.0
	05/16/05	<50	<50	<0.50	0.55	<0.50	<0.50	<1.0
MW-7	12/14/00	<50	<50	<0.5/5	<0.5	<0.5	<0.5	<0.5
	05/07/01	<50	<50	---	<0.5	<0.5	<0.5	<0.5
	10/04/01	<50	<50	---	<0.3	<0.3	<0.3	<0.6
	02/09/05	---	<50	0.55	<0.50	<0.50	<0.50	<1.0
	05/16/05	---	<50	<0.50	<0.50	<0.50	<0.50	<1.0
MW-8	12/14/00	<50	<50	0.52	<0.5	<0.5	<0.5	<0.5
	05/07/01	<50	<50	---	<0.5	<0.5	<0.5	<0.5
	10/04/01	<50	<50	---	<0.3	<0.3	<0.3	<0.6
	02/09/05	---	<50	<0.50	<0.50	<0.50	<0.50	<1.0
	05/16/05	---	<50	<0.50	<0.50	<0.50	<0.50	<1.0

Notes: ug/L = micrograms per liter (approximately equivalent to ppb)
--- = analysis not performed
Select data flags have been removed from the previously reported data table

5.0 DISCUSSION

This report documents the second monitoring and sampling event conducted in 2005. Previous groundwater monitoring and sampling was conducted from December 2000 to October 2001. Measured groundwater elevations differed from the February monitoring and sampling event, increasing from 0.36 to 1.39 feet in the seven respective groundwater monitoring wells. During this event, and excluding data from well MW-8, the calculated groundwater flow direction was west-northwest at an average gradient of 0.004 foot per foot. These values are generally consistent with historical trends and would be expected based on local topography and surface water drainage pathways. When the suspect groundwater elevation value from well MW-8 was removed, the elevation contours better approximated previously reported groundwater flow direction and gradient values. ACC believes that tidal fluctuations, apparent in San Leandro Creek located approximately 200 feet west and northwest of the Site, are responsible for the variation in changes in groundwater elevation measured in the monitoring wells. In addition, tidal fluctuations may be responsible for the varying calculated groundwater flow directions and gradients reported for the Site from September 1999 to May 2001, and the varying groundwater elevations reported for each respective well from February to May 2005.

Reported TPHd was 340 micrograms per Liter (µg/L) in well MW-5, 140 µg/L in well MW-2, but was not detected above its laboratory reporting limit in wells MW-6. TPHg was reported in wells MW-2 through MW-5 at concentrations ranging from 650 to 7,100 µg/L but was not detected above its laboratory reporting limit in wells MW-6 through MW-8. Detectable TPHg

concentrations increased in wells MW-2, MW-4, and MW-5 and decreased in well MW-3. BTEX concentrations were also reported in wells MW-2 through MW-5 but generally remain present at relatively low concentrations. Benzene was reported at concentrations ranging from 0.55 µg/L in well MW-6 to 1,200 µg/L in well MW-3. MTBE was not detected above its laboratory reporting limit and does not appear to be a constituent of concern.

In comparison to the May 2005 sampling event, TPHd, TPHg, and BTEX concentrations generally increased slightly. These increases were likely due to increased seasonal contact between groundwater and residual petroleum hydrocarbons in soil above the water table.

6.0 CONCLUSIONS

Based on findings of this well monitoring and sampling event, and comparison to historical well monitoring and sampling data, ACC concludes the following:

- The calculated groundwater flow direction and gradient is generally consistent with historical trends, topography, and surface drainage;
- TPHd, TPHg, BTEX concentrations generally increased slightly but were consistent with the previous sampling event, and no detectable TPHg, BTEX, or MTBE concentrations were reported in offsite monitoring wells MW-7 and MW-8;
- Wells MW-3, MW-4, and MW-5 reported slight increases in TPHg or BTEX and these monitoring wells are located in proximity of the former UST and product dispensers;
- Groundwater is semi-confined and rises seven to eight feet in the well casings;
- Natural attenuation processes are preferentially degrading BTEX and reported TPHg and BTEX concentrations indicate that no significant source of gasoline impact to groundwater is present; and
- TPHg and BTEX are the primary constituents of concern and any additional investigation or groundwater monitoring should target these analytes.

7.0 RECOMMENDATIONS

Based on our review of historical site investigation findings and the results of recently completed groundwater monitoring, ACC recommends the following:

- Prepare and submit a Conceptual Site Model to the lead regulatory agency and evaluate the need for and scope of any additional site investigation and identify what additional investigation data is needed to evaluate the Site for full regulatory closure; and
- As required by the lead regulatory agency, obtain the data necessary to make the Site Geotracker compliant in anticipation of eventual regulatory site closure.

8.0 LIMITATIONS

The service performed by ACC has been conducted in a manner consistent with the levels of care and skill ordinarily exercised by members of our profession currently practicing under similar conditions in the area. No other warranty, expressed or implied, is made.

The conclusions presented in this report are professional opinions based on the indicated data described in this report and applicable regulations and guidelines currently in place. They are intended only for the purpose, site, and project indicated. Opinions and recommendations presented herein apply to site conditions existing at the time of our study.

ACC has included analytical results from a state-certified laboratory, which performs analyses according to procedures suggested by the U.S. Environmental Protection Agency and the State of California. ACC is not responsible for laboratory errors in procedure or result reporting.