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2:05 pm, Jul 28, 2010

Alameda County
Environmental Health

July 23, 2010

Mr. Jerry Wickham, PG Senior Hazardous Materials Specialist Alameda County Health Care Services Agency Environmental Health Services Environmental Protection 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502

Re: Results of Sub-Slab Soil Vapor Investigation Report

P&D 23rd Avenue Associates 1125 Miller Avenue, Oakland, CA Clearwater Project No. CB018H ACEH Fuel Case Leak No. RO0000294

Dear Mr. Wickham,

As the legally authorized representative of the above-referenced project location I have reviewed the attached report prepared by my consultant of record, Clearwater Group, Inc. 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,

Mr. Dermot O'Doherty



July 23, 2010

Mr. Jerry Wickham, PG Senior Hazardous Materials Specialist Alameda County Health Care Services Agency Environmental Health Services Environmental Protection 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502

Re: Results of Sub-Slab Soil Vapor Investigation Report

P&D 23rd Avenue Associates (Formerly 23rd Avenue Partners) 1125 Miller Avenue, Oakland, CA Clearwater Project No. CB018H ACEH Fuel Case Leak No. RO0000294

Dear Mr. Wickham,

Clearwater Group (Clearwater), on behalf of Mr. Dermot O'Doherty representing P&D 23rd Avenue Associates (formerly 23rd Avenue Partners), is pleased to present the *Results of Sub-Slab Soil Vapor Investigation Report* prepared for the project site (*site*) located at 1125 Miller Avenue, Oakland, in Alameda County, California (**Figure 1**).

Alameda County Environmental Health Services (ACEH), in a letter dated October 28, 2009 (**Attachment A**), concurred with Clearwater's recommendation for additional sub-slab vapor sampling as outlined in the document *Work Plan for Sub-Slab Vapor Sampling* dated September 2008. The purpose of the investigation was to obtain additional vapor data to address concerns regarding vapor intrusion into the building, sourcing from the residual hydrocarbons present in the soils near the former fuel dispenser location (**Figure 2**).

Investigation Activities – Event Preparation

No drilling or encroachment permits were required for this investigation. All holes in the slab were on the property, and an inquiry with the Alameda County Building Department confirmed no building permit is required for sub-slab drilling and sampling. Six sub-slab vapor sampling points were installed at the locations shown in **Figure 2**. Slab thickness at sample locations SS-1, SS-4, SS-5, and SS-6 was approximately 6 inches. Slab thickness at sample locations SS-2 and SS-3 was approximately 18 inches.

The vapor sampling points consisted of a stainless steel sampling tube set in expanding concrete in a pre-drilled 1-inch diameter hole in the building slab. The tube was held in place by a rubber



stopper until the concrete hardened and a stainless steel flush mount plug was installed in the sampling port to keep the port clean when not in use. During sampling, a stainless steel hose barb wrapped with Teflon tape replaced the flush mounted plug. See **Figure 3** for a schematic representation of the sampling port.

The vapor sampling points were installed on June 10, 2010, and were allowed to equilibrate for one week. On June 17, 2010, TEG Northern California, Inc. (TEG), of Rancho Cordova, California, a State of California-certified mobile laboratory, performed sampling and analysis. The TEG laboratory technicians were responsible for sample collection and analysis. The technicians removed the flush mount plug, installed the hose barb, removed the purge volume, and collected the samples. A sampling shroud and leak detector compound (1,1–difluoroethane) were used to ensure sample integrity. One sample was collected from each sample port, and a duplicate sample was collected from sub-slab vapor sample location SS-3 for quality control purposes.

Soil Vapor Sampling Results

The laboratory reported no detectable concentrations of total petroleum hydrocarbons as diesel (TPH-d), the contaminant of concern at this *site*, in any of the six sample locations. The analytical results are summarized in **Table 1** and included as **Attachment B**.

One vapor sampling point, SS-3, which is not near the former dispenser (**Figure 2**), contained measurable amounts of total petroleum hydrocarbons as gasoline (TPH-g) and toluene, ethylbenzene, and total xylenes. Although these are not the contaminants of concern at this *site*, their presence in sample SS-3 is discussed below:

- Benzene was not detected in any of the six sample points, including SS-3.
- Toluene was detected in SS-3 at up to 2600 μg/m³, well below the Environmental Screening Level (ESL) of 63,000 μg/m³ for residential exposure, as established by the San Francisco Bay Regional Water Quality Control Board.
- The maximum level of total xylenes detected in SS-3 was $6,050 \,\mu\text{g/m}^3$, also well below the residential ESL of $21,000 \,\mu\text{g/m}^3$.
- The maximum level of ethylbenzene detected in SS-3 was 2,000 $\mu g/m^3$. This level is above the ESL for residential exposure (980 $\mu g/m^3$) but below the ESL of 3,300 $\mu g/m^3$ for commercial/industrial exposure.
- TPH-g was detected in sample SS-3 at levels of 37,000 μg/m³ in the first sample and 30,000 μg/m³ in the duplicate sample. These levels exceed both the residential ESL (10,000 μg/m³) and the commercial/industrial ESL (29,000 μg/m³).



Conclusions

- There were no reportable concentrations of the contaminant of concern, TPH-d, above the laboratory reporting limits for any of the six vapor samples collected sub-slab.
- There is a concentration of TPH-g (not a contaminant of concern in this investigation) from sample point SS-3, but no other sample points detected any TPH-g or benzene, toluene, ethylbenzene or total xylenes. The source is unknown.
- Only TPH-g and ethylbenzene are above the ESL for residential exposure, and only TPH-g is above the ESL for commercial/industrial exposure.
- The floor slab over sample point SS-3 is approximately 18 inches thick and appears to be in good condition.
- Soil vapor sampling has confirmed that TPH-d vapor intrusion is not a concern at this *site*, and the *site* probably meets the criteria for low-risk closure for this contaminant.

Recommendations

On the basis of the low-risk evaluation criteria established under the San Francisco Bay Regional Water Quality Control Board, namely that:

- The leak from the Underground Fuel Storage Tank Systems have been stopped and ongoing sources, including free product, have been removed;
- The *site* has been partially characterized. Soil and soil vapor have been sampled and analyzed in three separate events. No groundwater samples have been collected at this *site*;
- The *site* release, as characterized and with its current use, presents minimal risk to human health; and
- The *site* release presents minimal risk to the environment;

Clearwater respectfully requests that this *site* be closed.



REPORT LIMITATION

All work performed under this contract was directed by a licensed professional. The work was performed in accordance with generally accepted practices at the time the work was performed and completed in accordance with generally acceptable standards. In the course of normal business, recommendations by the in-house professional may include the use of equipment, services, or products in which the Company has an interest. Therefore, the Company is making full disclosure of potential or perceived conflicts of interest to all parties.

This report was prepared under the supervision of a State of California Professional Geologist, Engineer, or other licensed professional. Statements, conclusions, and recommendations made in this report are based on information provided to Clearwater, observations of existing site conditions, our general knowledge of the site, limited testing of selected soil and groundwater samples, and interpretations of a limited set of data. Clearwater cannot be held responsible for the accuracy of the analytical work performed by others.

Information and interpretation presented herein are for the use of the client. Third parties should rely upon the information and interpretation contained in this document at their own risk. No other warranties, certifications, or representations, either expressed or implied, are made about the information supplied in this report. The service performed by Clearwater has been conducted in a manner consistent with the level of care and skill ordinarily exercised by members of our profession currently practicing under similar conditions in the area of the site.

Sincerely, Clearwater Group

Prepared by:

Erik Lervaag Project Manager

Olivia Jacobs REA I #3219 Chief Executive Officer Reviewed by:

James A. Jacobs, PG #4815, C Chief Hydrogeologist

NO. 88 CERTIFIED

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FIGURES:

Site Vicinity Map Figure 1:

Figure 2: Sub-Slab Vapor Sampling Locations Sub-Slab Sample Port Schematic Figure 3:

TABLES:

Table 1: Sub-Slab Soil Vapor Sampling Analytical Results

ATTACHMENTS:

Correspondence from Alameda County Environmental Health Services Attachment A:

dated October 28, 2009

TEG Laboratory Report #00617F Attachment B:

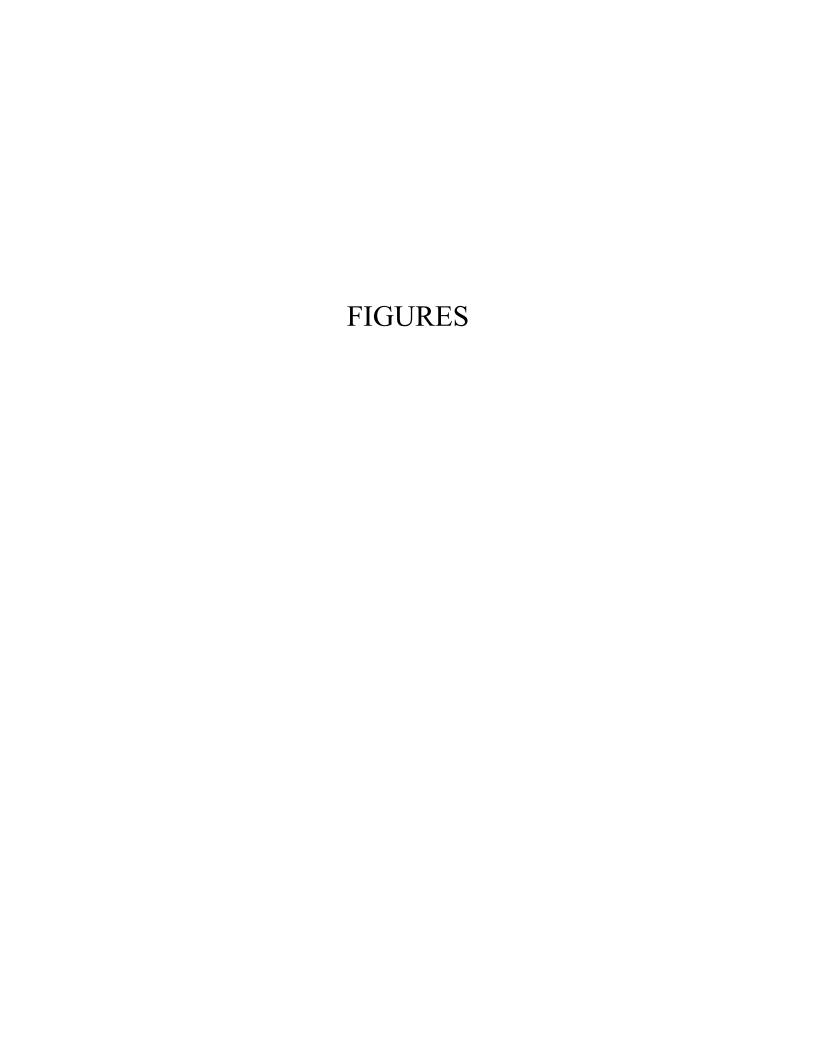
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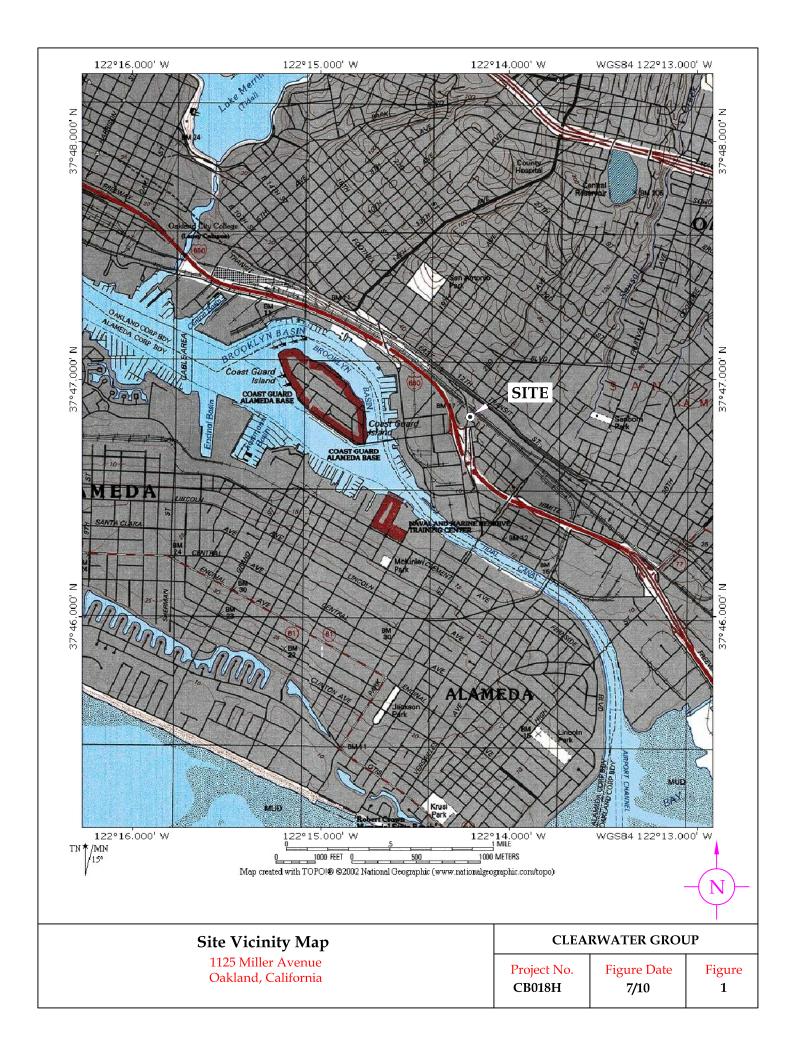
Mr. Dermot O'Doherty P&D 23rd Avenue Associates

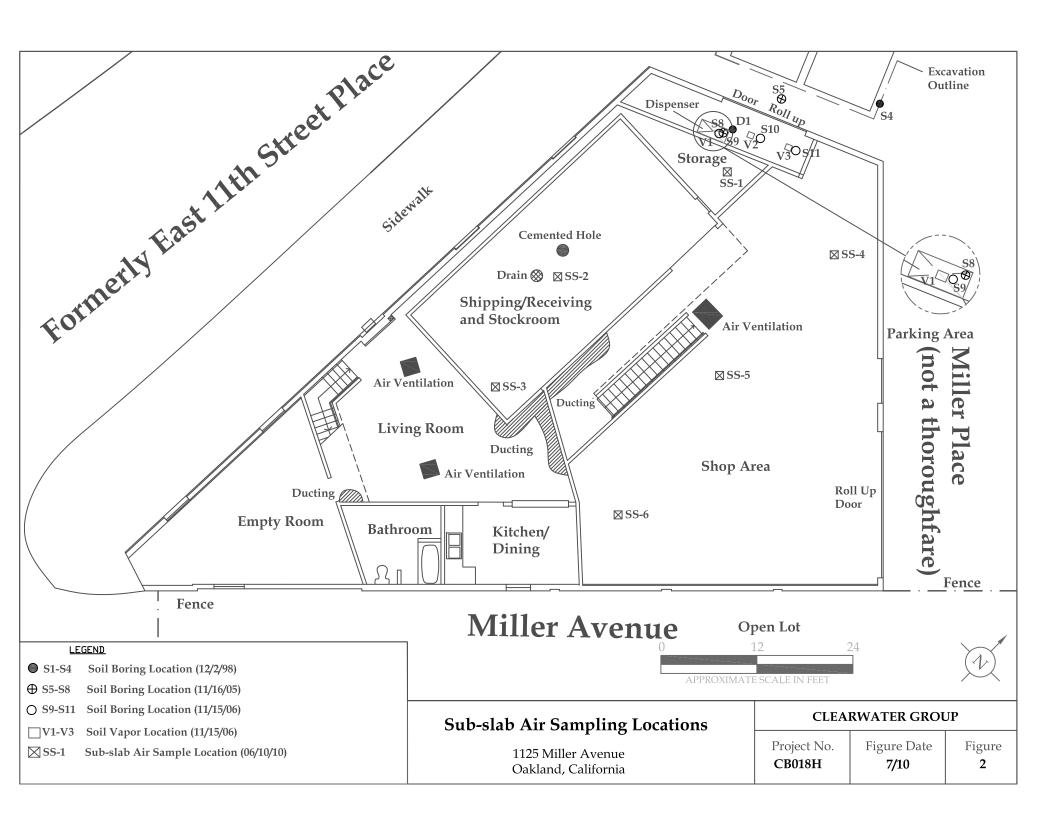
c/o: Madison Park Financial Corporation

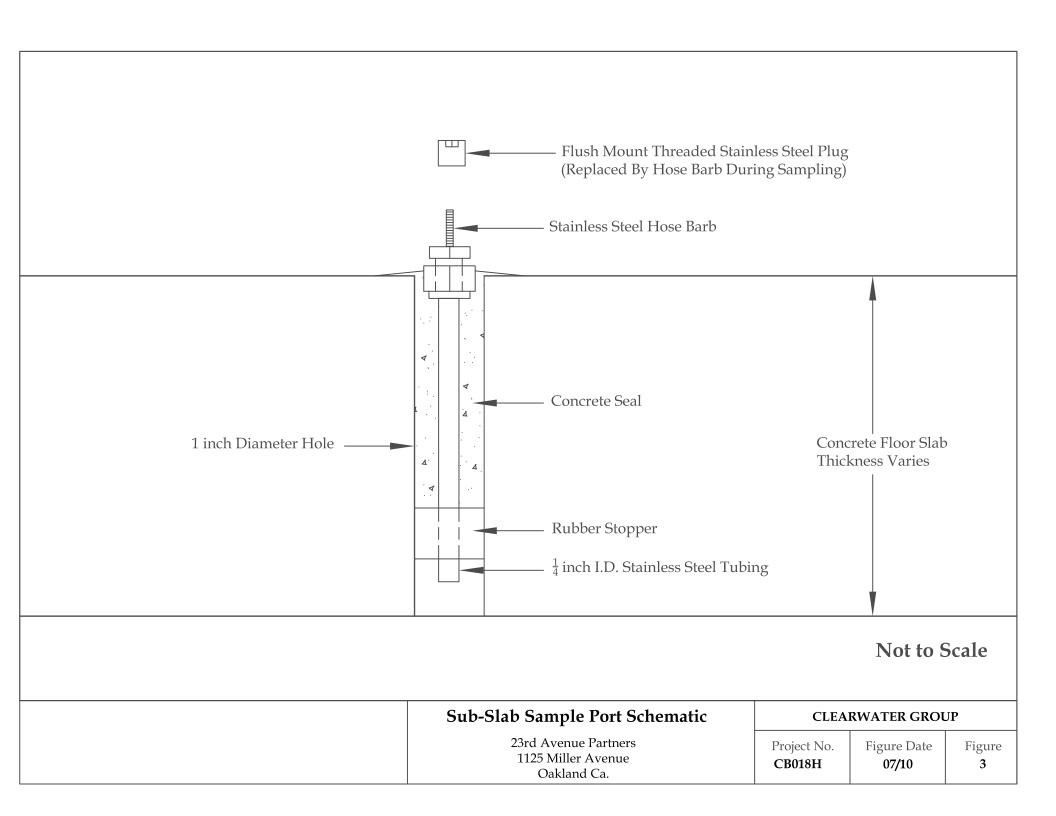
409 Thirteenth Street, 8th Floor

Oakland, CA 94612









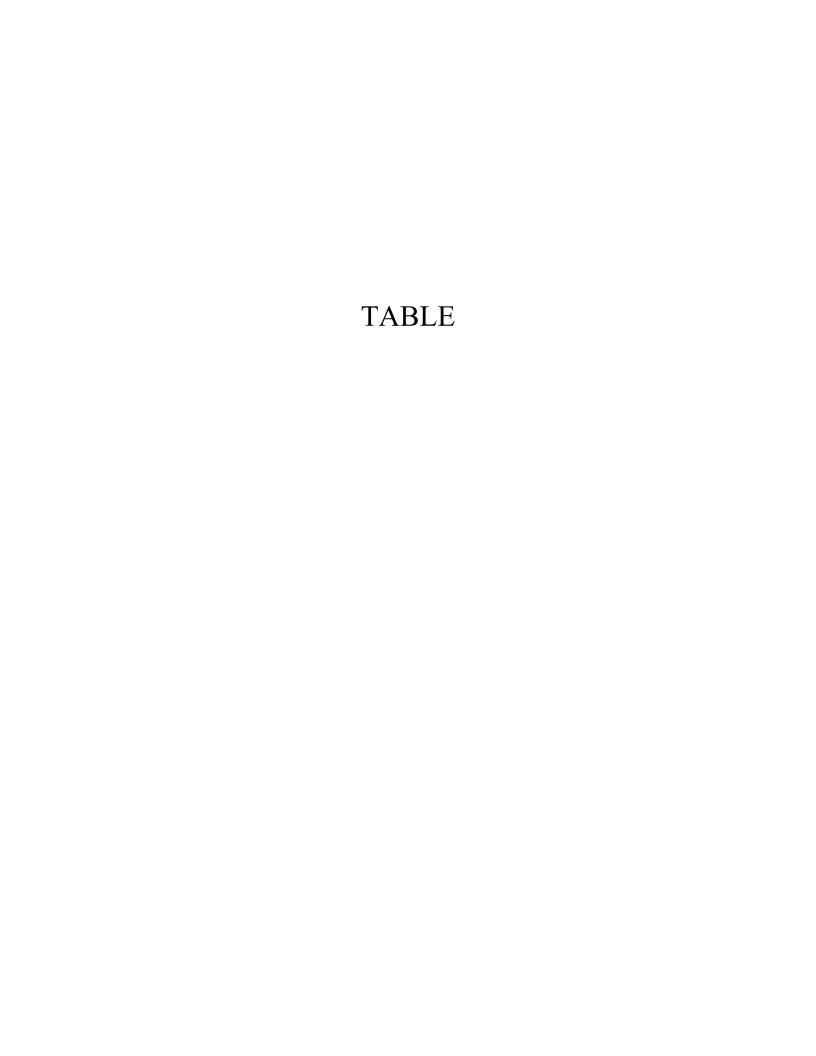


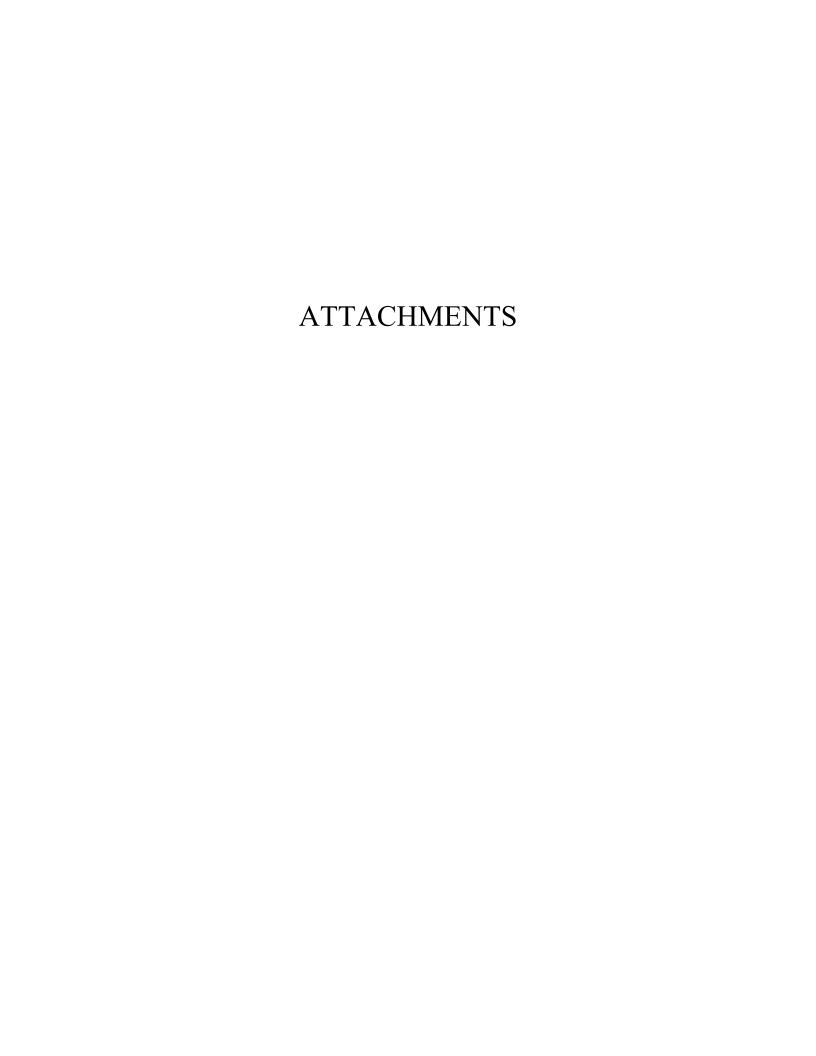
TABLE 1 **Sub-Slab Soil Vapor Sampling Analytical Results**

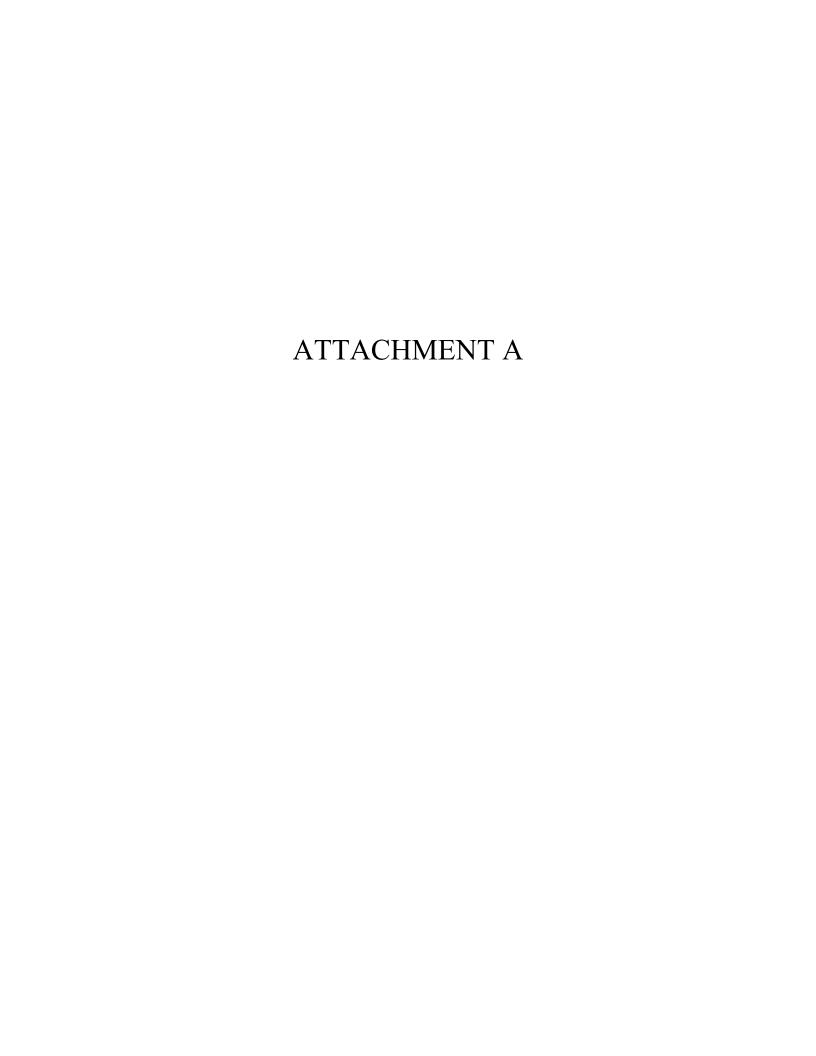
P&D 23rd Avenue Associates 1125 Miller Avenue Oakland, California Clearwater Project No. CB018H

Sample	Sampling	Analytical	TPH-d	TPH-g	В	T	\mathbf{E}	X
(ID)	Date	Method	$(\mu g/m^3)$					
Envionmental Sc	reening Level	(ESL)	10,000	10,000	84	63,000	980	21,000
SS-1	6/17/2010	8260B	<50,000	<10,000	<100	<200	<100	<200
SS-2	6/17/2010	8260B	<50,000	<10,000	<100	< 200	<100	< 200
SS-3	6/17/2010	8260B	<50,000	37,000	<100	2,600	2,000	6,050
SS-4	6/17/2010	8260B	<50,000	<10,000	<100	< 200	<100	< 200
SS-5	6/17/2010	8260B	<50,000	<10,000	<100	< 200	<100	< 200
SS-6	6/17/2010	8260B	<50,000	<10,000	<100	< 200	<100	< 200
SS-3 Duplicate	6/17/2010	8260B	<50,000	30,000	<100	2,100	1,600	4,990

Notes:	
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Notes:	
ESL	Environmental Screening Level from, Screening for Environmental Concerns at Sites with Contaminated Soil and
	Groundwater, Table E-2, Revised May 2008.
$\mu g/m^3$	Micrograms per cubic meter
TPH-d	Total petroleum hydrocarbons detected within the diesel range of C10-C28
TPH-g	Total petroleum hydrocarbons detected within the gasoline range of C6-C12
В	Benzene
T	Toluene
E	Ethylbenzene
X	Total Xylenes
Bold	Data in boldface type indicates that the analyte was detected above the ESL.





ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



ALEX BRISCOE, Acting Director

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

October 28, 2009

Mr. Dermot O'Doherty
P&D 23rd Avenue Associates, LLC
P.O. Box 687
Oakland, CA 94604

Subject: Fuel Leak Case No. RO0000294 and Geotracker Global ID T0600177455, 23rd Avenue Partners, 1125 Miller Avenue, Oakland, CA 94601

Dear Mr. O'Doherty:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site. In reviewing the submittals on the State Water Resources Control Board Geotracker website, we discovered a document entitled, "Work Plan for Sub-Slab Vapor Sampling," dated September 2008. The September 2008 Work Plan was apparently only submitted to Geotracker and not the ACEH case files. Therefore, we were not aware of the Work Plan and did not review it until recently discovering it on Geotracker. We have downloaded the document to the ACEH case files. In the future, please be sure to upload all submittals to both the ACEH case file and Geotracker in order for the documents to be logged, tracked, and reviewed.

The September 2008 Work Plan proposes sub-slab vapor sampling at six locations within the building at 1125 Miller Avenue. Prior to performing the soil vapor sampling, the Work Plan proposes performing a resident survey as described in an appendix to the Work Plan, The proposed scope of work is acceptable and may be implemented as proposed. We request that you perform the proposed work and send us the reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- March 27, 2010 Sub-Slab Vapor Sampling Report
- These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Mr. Dermot O'Doherty RO000294 October 28, 2009 Page 2

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

Mr. Dermot O'Doherty RO000294 October 28, 2009 Page 3

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry wickham@acgov.org.

Sincerely,

Nerry Wiskham, California PG 3766, CEG 1177, and CHG 297

Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341 Oakland, CA 94612-2032

James Jacobs, Clearwater Group, 229 Tewksbury Avenue, Pt. Richmond, CA 94801

Donna Drogos, ACEH Jerry Wickham, ACEH Geotracker, File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)

ISSUE DATE: July 5, 2005

REVISION DATE: March 27, 2009

PREVIOUS REVISIONS: December 16, 2005,

October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a single portable document format (PDF) with no password protection. (Please do not submit reports as attachments to electronic mail.)
- It is preferable that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements must be included and have either original or electronic signature.
- Do not password protect the document. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. Documents with password protection will not be accepted.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO# Report Name Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

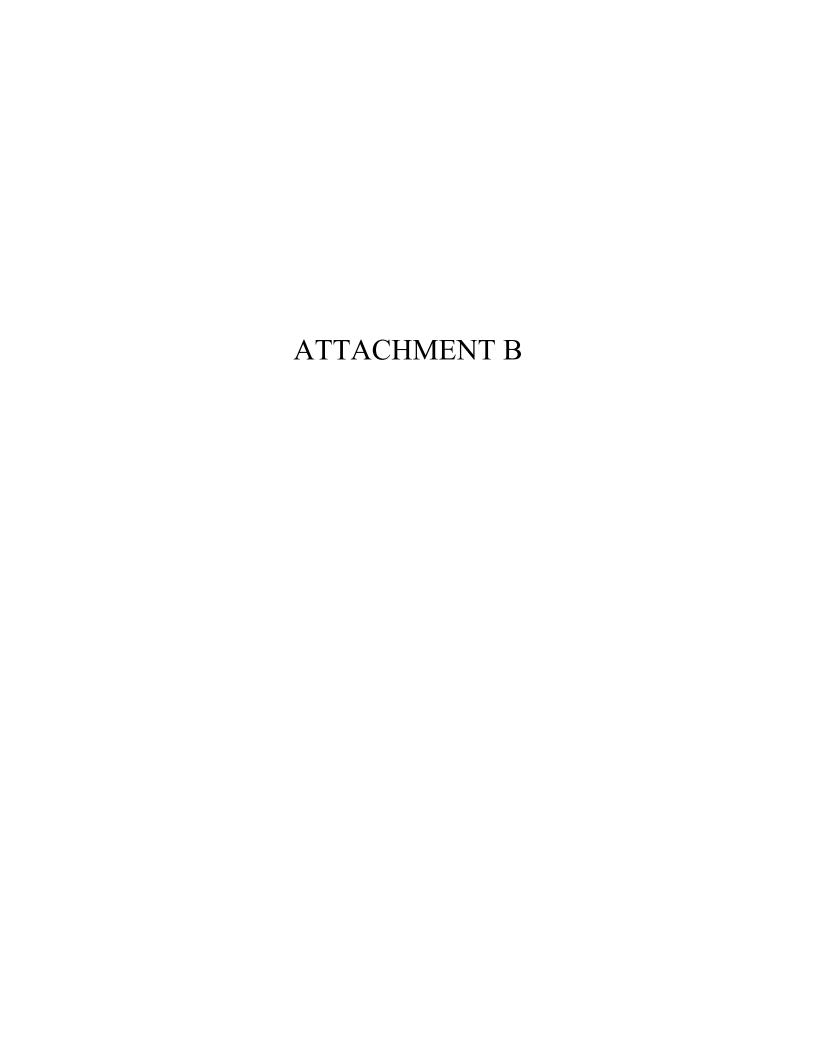
A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org

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- ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
- b) In the subject line of your request, be sure to include "ftp PASSWORD REQUEST" and in the body of your request, include the Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO# use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.





8 July 2010

Mr. Erik Lervaag Clearwater Group 229 Tewksbury Avenue Point Richmond, CA 94801

SUBJECT: DATA REPORT - Clearwater Group Project # CB018H

23rd Avenue Partners - 1125 Miller Avenue, Oakland, California

TEG Project # 00617F

Mr. Lervaag:

Please find enclosed a data report for the samples analyzed from the above referenced project for Clearwater Group. The samples were analyzed on site in TEG's mobile laboratory. TEG conducted a total of 14 analyses on 7 soil vapor samples.

- -- 7 analyses on soil vapors for aromatic volatile hydrocarbons (BTEX), naphthalene, fuel oxygenates, and total petroleum hydrocarbons-gasoline by EPA method 8260B.
- -- 7 analyses on soil vapors for total petroleum hydrocarbons-diesel by EPA method mod8015.

The results of the analyses are summarized in the enclosed tables. Applicable detection limits and calibration data are included in the tables.

- 1.1 difluoroethane was used as a leak check compound during the soil vapor sampling. No
- 1,1 difluoroethane was detected in any of the vapor samples reported at or above the DTSC recommended leak check compound reporting limit of 10 µg/L of vapor.

TEG appreciates the opportunity to have provided analytical services to Clearwater Group on this project. If you have any further questions relating to these data or report, please do not hesitate to contact us.

Sincerely,

Mark Jerpbak Director, TEG-Northern California



Clearwater Group - Project #CB018H 23rd Avenue Partners 1125 Miller Avenue, Oakland, California

TEG Project #00617F

Analyses of SOIL VAPOR in micrograms per cubic meter of Vapor

BTEX, Naphthalene, Oxygenates, & TPH-gasoline (EPA method 8260B) & TPH-diesel (EPA method 8015m)

SAMPLE NUMBER: COLLECTION DATE: COLLECTION TIME:		Syringe Blank	SS-1 6/17/10 13:00	SS-2 6/17/10 12:08	SS-3 6/17/10 11:45	SS-3 dup 6/17/10 13:50	SS-4 6/17/10 12:30	SS-5 6/17/10 13:28	SS-6 6/17/10 10:28
		6/17/10							
		09:20							
DILUTION FACTOR (VOCs):	RL	1	1	1	1	1	1	1	1
Benzene	100	nd	nd	nd	nd	nd	nd	nd	nd
Toluene	200	nd	nd	nd	2600	2100	nd	nd	nd
Ethylbenzene	100	nd	nd	nd	2000	1600	nd	nd	nd
m,p-Xylene	200	nd	nd	nd	5100	4200	nd	nd	nd
o-Xylene	100	nd	nd	nd	950	790	nd	nd	nd
Naphthalene	100	nd	nd	nd	nd	nd	nd	nd	nd
tert-Butanol (TBA)	1000	nd	nd	nd	nd	nd	nd	nd	nd
Methyl-t-butyl ether (MtBE)	100	nd	nd	nd	nd	nd	nd	nd	nd
Diisopropyl ether (DIPE)	100	nd	nd	nd	nd	nd	nd	nd	nd
Ethyl-t-butyl ether (EtBE)	100	nd	nd	nd	nd	nd	nd	nd	nd
Tert-amyl methyl ether (TAME)	100	nd	nd	nd	nd	nd	nd	nd	nd
TPH (gasoline range)	10000	nd	nd	nd	37000	30000	nd	nd	nd
TPH (diesel range)	50000	nd	nd	nd	nd	nd	nd	nd	nd
1,1 Difluoroethane (leak check)	10000	nd	nd	nd	nd	nd	nd	nd	nd
Surrogate Recovery (DBFM) Surrogate Recovery (1,4-BFB)		75% 97%	90% 107%	90% 108%	84% 105%	89% 108%	89% 110%	94% 113%	79% 102%

'RL' Indicates reporting limit at a dilution factor of 1 'nd' Indicates not detected at listed reporting limits

Analyses performed in TEG-Northern California's lab Analyses performed by: Mr. Leif Jonsson

11350 Monier Park Place, Rancho Cordova, CA 95742

Phone: (916) 853-8010

Fax: (916) 853-8020



Clearwater Group - Project # CB018H 23rd Avenue Partners 1125 Miller Avenue, Oakland, California

TEG Project #00617F

CALIBRATION STANDARDS - Initial Calibration / LCS

Instrument: Agilent 5973N MSD					
	INITIAL CA	LIBRATION	LCS		
COMPOUND	RF	%RSD	<i>RF</i>	%DIFF	
Benzene	1.177	4.9%	1.221	3.7%	
Toluene	0.689	4.0%	0.744	8.0%	
Ethylbenzene	0.582	7.9%	0.593	1.9%	
m,p-Xylene	0.712	7.1%	0.749	5.2%	
o-Xylene	0.673	13.4%	0.728	8.2%	
Naphthalene	1.916	14.5%	1.894	1.1%	
tert-Butanol (TBA)*	0.020	12.5%	0.017	15.0%	
Methyl-t-butyl ether (MtBE)	0.671	3.0%	0.670	0.1%	
Diisopropyl ether (DIPE)	1.001	4.2%	1.127	12.6%	
Ethyl-t-butyl ether (EtBE)	0.799	2.5%	0.845	5.8%	
Tert-amyl methyl ether (TAME)	0.686	4.1%	0.700	2.0%	
TPH-Gasoline	1.129	11.7%	1.205	6.7%	
TPH-Diesel	8.66	12.5%	8.04	7.2%	
Acceptable Limits		20.0%		15.0%	

Phone: (916) 853-8010

Fax: (916) 853-8020

^{&#}x27;*' Indicates RSD not to exceed 30% & LCS not to exceed 25%