

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

StID 3581

March 3, 1998

Mr. Philip Briggs  
Chevron Products Co  
P.O. Box 5004  
San Ramon, CA 94583-0804

Re: Fuel Leak Site Case Closure for Former Chevron Service Station  
9-4463, Alameda, CA 94501

Dear Mr. Briggs:

This letter transmits the enclosed underground storage tank (UST) case closure letter in accordance with Chapter 6.75 (Article 4, Section 25299.37[h]). The State Water Resources Control Board adopted this letter on February 20, 1997. As of March 1, 1997, the Alameda County Environmental Protection Division is required to use this case closure letter for all UST leak sites. We are also transmitting to you the enclosed case closure summary. These documents confirm the completion of the investigation and cleanup of the reported release at the subject site. The subject fuel leak case is closed.

SITE INVESTIGATION AND CLEANUP SUMMARY

Please be advised that the following conditions exist at the site:

- o up to 2,200 ppm TPH as gasoline and 1.7 ppm benzene remain in soil at ~7.5' bgs, and
- o up to 640 ppb TPHg, 9.4 ppb benzene, and 45 ppb MTBE were last identified in groundwater.

If you have any questions, please contact me at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

enclosure:

1. Case Closure Letter
2. Case Closure Summary

c: Vivian Day  
City Hall, Room 190  
2263 Santa Clara Ave  
Alameda, CA 94501

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

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ENVIRONMENTAL HEALTH SERVICES  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
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REMEDIAL ACTION COMPLETION CERTIFICATION

StID 3581 - 1801 Park Street, Alameda, CA  
(3-10,000 gallon gasoline tanks removed in Oct 1995)

March 4, 1998

Mr. Philip Briggs  
Chevron Products Co  
P.O. Box 5004  
San Ramon, CA 94583-0804

Dear Mr. Briggs:

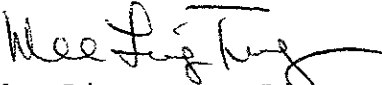
This letter confirms the completion of site investigation and remedial action for the underground storage tanks formerly located at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tanks are greatly appreciated.

Based on information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground tank release is required.

This notice is issued pursuant to a regulation contained in Title 23, Section 2721(e) of the California Code of Regulations.

Please contact our office if you have any questions regarding this matter.

Sincerely,

  
Mee Ling Tung, Director

cc: Richard Pantages, Chief of Division of Environmental Protection  
Kevin Graves, RWQCB  
Dave Deaner, SWRCB  
Steve McKinley, City of Alameda Fire Department  
files-ec (chvron2.4)

801-2219  
Need to  
input

97 APR 31 PM 3:08

**CASE CLOSURE SUMMARY**  
**Leaking Underground Fuel Storage Tank Program**

**I. AGENCY INFORMATION**

**Date:** March 6, 1997

Agency name: **Alameda County-HazMat** Address: **1131 Harbor Bay Pkwy**  
City/State/Zip: **Alameda, CA 94502** Phone: **(510) 567-6700**  
Responsible staff person: **Eva Chu** Title: **Hazardous Materials Spec.**

**II. CASE INFORMATION**

Site facility name: **Former Chevron Service Station #9-4463**  
Site facility address: **1801 Park Street, Alameda, CA 94501**  
RB LUSTIS Case No: **N/A** Local Case No./LOP Case No.: **3581**  
URF filing date: **10/26/95** SWEEPS No: **N/A**

<u>Responsible Parties:</u>	<u>Addresses:</u>	<u>Phone Numbers:</u>
Philip Briggs Chevron Products	P.O. Box 5004 San Ramon, CA 94583-0804	510/842-9136

<u>Tank No:</u>	<u>Size in gal.:</u>	<u>Contents:</u>	<u>Closed in-place or removed?:</u>	<u>Date:</u>
1	10,000	Gasoline	Removed	10/18/95
2	10,000	"	"	"
3	10,000	"	"	"

**III. RELEASE AND SITE CHARACTERIZATION INFORMATION**

Cause and type of release: **Possible leaking product piping**  
Site characterization complete? **YES**  
Date approved by oversight agency: **2/7/97**  
Monitoring Wells installed? **Yes** Number: **5**  
Proper screened interval? **Yes, 5' to 17' in well C-1**  
Highest GW depth below ground surface: **4.22'** Lowest depth: **6.50' in C-1**  
Flow direction: **North to South**  
Most sensitive current use: **Commercial**  
Are drinking water wells affected? **No** Aquifer name: **Merritt Sand**  
Is surface water affected? **No** Nearest affected SW name: **NA**  
Off-site beneficial use impacts (addresses/locations): **None**

Report(s) on file? **YES** Where is report(s) filed? **Alameda County**  
**1131 Harbor Bay Pkwy**  
**Alameda, CA 94502**

Treatment and Disposal of Affected Material:

<u>Material</u>	<u>Amount</u> (include units)	<u>Action (Treatment</u> <u>or Disposal w/destination)</u>	<u>Date</u>
Tank & Piping	3 USTs	Disposed by Erickson, Richmond, CA	10/18/95
Soil	~87 cy	Disposed at BFI L.F., Livermore, CA	12/6/95

Maximum Documented Contaminant Concentrations - - Before and After Cleanup

Contaminant	Soil (ppm)		Water (ppb)	
	Before <sup>1</sup>	After <sup>2</sup>	Before <sup>3</sup>	After <sup>4</sup>
TPH (Gas)	8,800	2,200	1,600	640
TPH (Diesel)				
Benzene	27	1.7	440	9.4
Toluene	400	47	5.7	2.6
Ethylbenzene	180	43	130	72
Xylenes	990	250	96	35
MTBE	0.89	ND	5,200	45

- NOTE: 1 soil sample collected from tank pit during time of UST removal, 10/18/95  
 2 soil sample collected after overexcavation at 7.5' bgs, 10/31/95  
 3 maximum historical contamination from onsite monitoring wells  
 4 latest groundwater monitoring event, 12/11/96

Comments (Depth of Remediation, etc.):

See Section VII, Additional Comments, etc...


IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan?  
 Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan?  
 Does corrective action protect public health for current land use? **YES**  
 Site management requirements: **None**

Should corrective action be reviewed if land use changes? **YES**  
 Monitoring wells Decommissioned: **None, pending site closure**  
 Number Decommissioned: 0 Number Retained: 5  
 List enforcement actions taken: **None**  
 List enforcement actions rescinded: **NA**

**V. LOCAL AGENCY REPRESENTATIVE DATA**

Name: **Eva Chu** Title: **Haz Mat Specialist**

Signature:  Date: **4/1/97**

**Reviewed by**

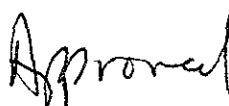
Name: **Juliet Shin** Title: **Sr. Haz Mat Specialist**

Signature:  Date: **3/11/97**


Name: **Thomas Peacock** Title: **Supervisor**

Signature:  Date: **3-27-97**

**VI. RWQCB NOTIFICATION**

Date Submitted to RB: **4/2/97** RB Response: 

RWQCB Staff Name: **Kevin Graves** Title: **AWRCE**

Signature:  Date: **4/21/97**

**VII. ADDITIONAL COMMENTS, DATA, ETC.**

Chevron purchased the property in 1985. It was then a gasoline service station and a car wash. The site is currently a vacant lot.

A leak in a dispenser filter was reportedly identified and immediately repaired in February 1985. Five groundwater monitoring wells (C-1 through C-5) were installed to determine if the release has impacted groundwater beneath the site. A slight hydrocarbon odor was encountered only in soil from boring C-2 at 6' to 7' below ground surface (bgs). A groundwater sampling event in August 1994 did not identify detectable levels of TPHg or BTEX in groundwater. Well C-1 was "dry", but was probably due to debris in the well. (See Fig 1 and Boring Logs)

When a hole (caused by the gauge stick) was identified in one of the USTs in March 1985, all three fuel tanks were taken out of service. The tanks were subsequently removed and replaced with double-walled fiberglass tanks. These "new" tanks were placed within the same excavation. In October 1995 the three "new" 10,000 gallon gasoline USTs were removed. The tank pit measured 40'x40'x15' deep. Groundwater was encountered in the excavation at ~12' bgs. Sidewall soil samples (T-1-10.5, T-1-7.9, T-2-11.0, T-3-10.5, T-4-11.0, T-5-10.5, T-6-10.5, and T-7-10.5) were collected at 7' to 11' bgs. A water sample was not collected from the pit because of proximal groundwater monitoring wells onsite. Soil samples (P-1-4.0 and P-2-4.0) were also collected from beneath the product lines at ~4' bgs. All soil samples were analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, toluene, ethyl-benzene, and xylenes (BTEX), methyl-tert-butyl

ether (MTBE), and lead. Sample T-3-10.5 collected from the fuel pit, and below the product piping, contained up to 8,800 parts per million (ppm) TPHg, and 27ppm, 400ppm, 180ppm, and 990ppm BTEX, respectively. (See Fig 2, Table A).

The "hot" area was overexcavated, removing ~87 cy of contaminated soil. The dimension of the overexcavation was ~20'x10'x9' deep. Confirmatory soil samples (PX-1-8.0, PX-2-7.5, and PX-3-7.5) were collected from each sidewall at ~7.5' to 8' bgs and analyzed for TPHg, BTEX, and MTBE. Although contamination was still evident in the excavation (up to 2,200 ppm TPHg, 1.7 ppm benzene) it was apparent that the contamination was below groundwater level. (See Fig 3, Table B)

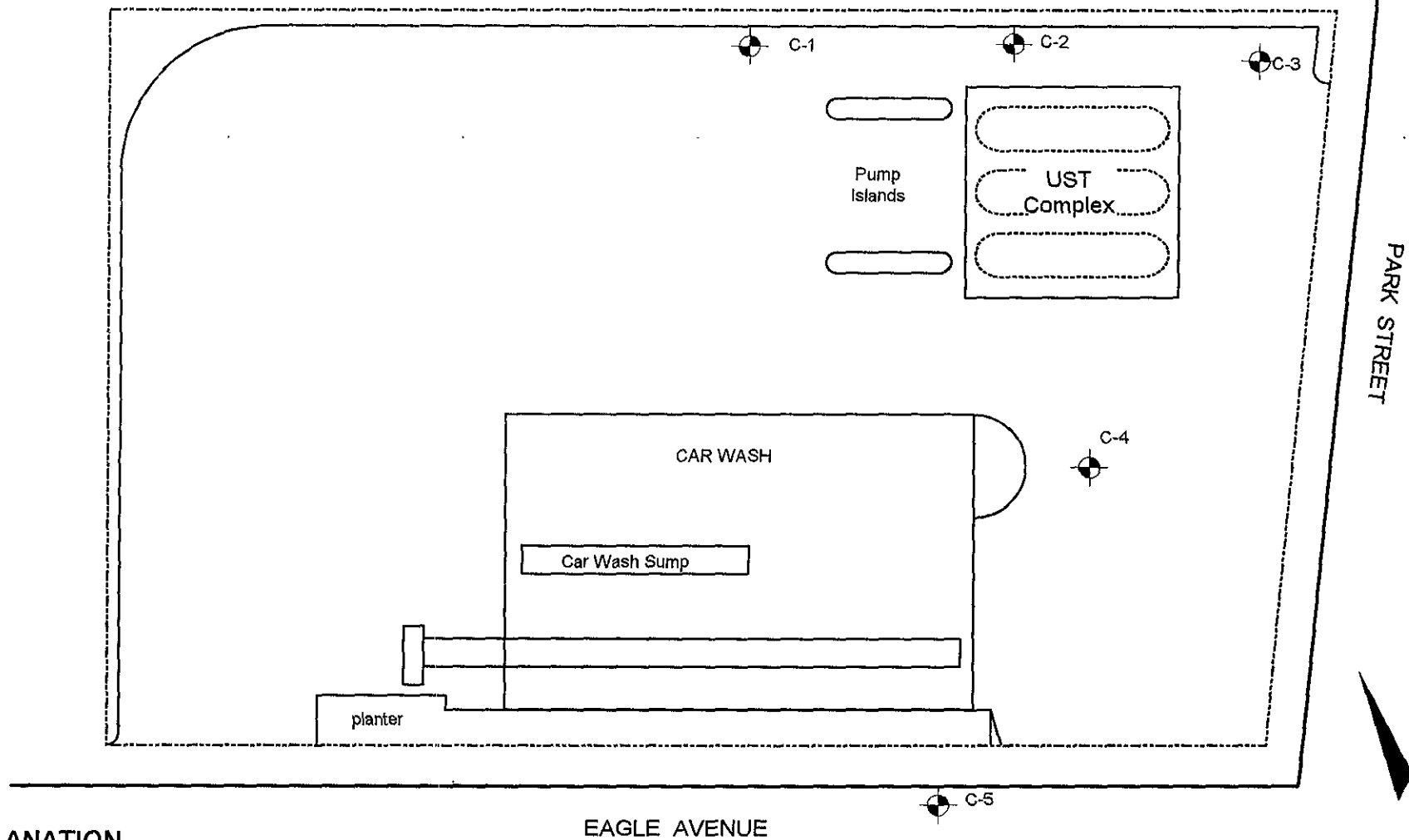
Quarterly monitoring of the onsite wells began in August 1995. During the six sampling events a maximum concentration of 1,500 ppb TPHg, 5,200 parts per billion (ppb) MTBE, and 440ppb, 5.7ppb, 130ppb, and 96ppb BTEX, respectively, were detected in groundwater. The most recent sampling event (12/96) showed lower concentrations of contaminants (640ppb TPHg, 13ppb MTBE, and 9.4ppb, 2.6ppb, 72ppb, and 45ppb BTEX, respectively. See Table C).

The highest contamination concentrations in groundwater have been detected in well C-1, near the location of the former pump island and where overexcavation activities to remove hydrocarbon-impacted soil were conducted. The bulk of the contaminant plume appears to be limited to the immediate vicinity of well C-1. Although residual soil contamination remains at 7' to 8' bgs (below groundwater level), groundwater contaminant levels appear to be decreasing through time. The current detected concentration levels in groundwater should not pose a risk to human health, based on the ASTM's RBCA Tier 1 Look Up Table. Continued sampling and/or monitoring is not warranted.



Groundwater flow direction has been from the north to south. The direction of groundwater flow to the southeast may be influenced by a groundwater extraction system that is currently operating at a site across Eagle Street (at 1725 Park Street).

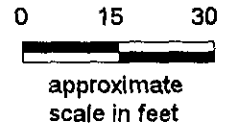
In summary, case closure is recommended because:

- o the leak and ongoing sources have been removed;
- o the site has been adequately characterized;
- o the dissolved plume is not migrating;
- o no water wells, surface water, or other sensitive receptors are likely to be impacted; and,
- o the site presents no significant risk to human health or the environment.



**EXPLANATION**

-  Monitoring Well
- UST  Underground Storage Tank



**SITE PLAN**

Former Chevron Service Station No. 9-4463  
1801 Park Street  
Alameda, California

**FIGURE**

**1**

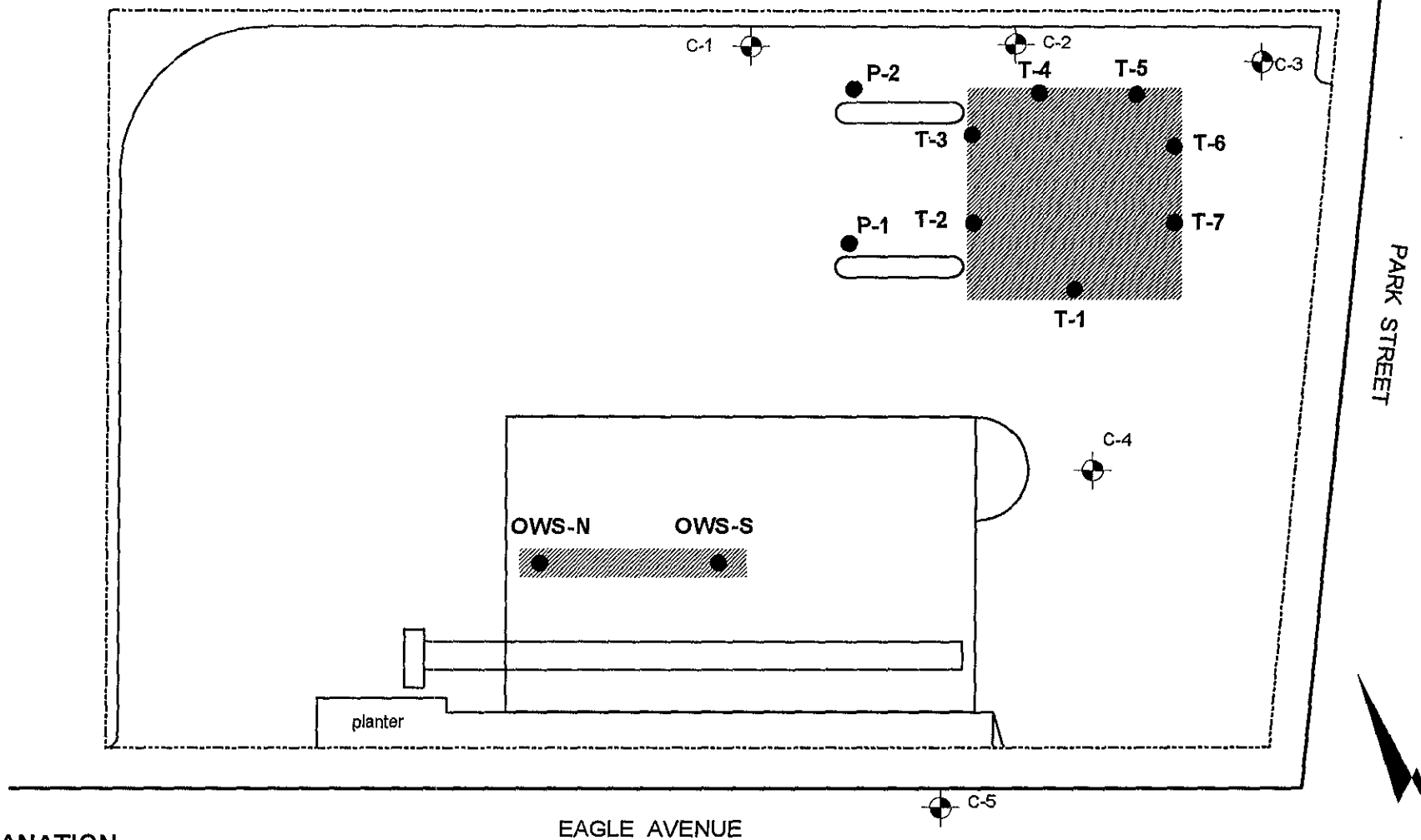
PROJECT NO.  
9-4463

DATE:  
1/96




DRAWN BY:  
WTJ

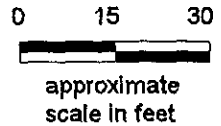
BASE MAP  
SIERRA CONTOUR MAP 8/94





**EXPLANATION**

-  Monitoring Well
-  PX-1 Soil sample location and ID
-  Excavation limits



**UST, PRODUCT ISLAND, AND SUMP  
SOIL SAMPLING LOCATION MAP**

Former Chevron Service Station No. 9-4463  
1801 Park Street  
Alameda, California

FIGURE

**2**

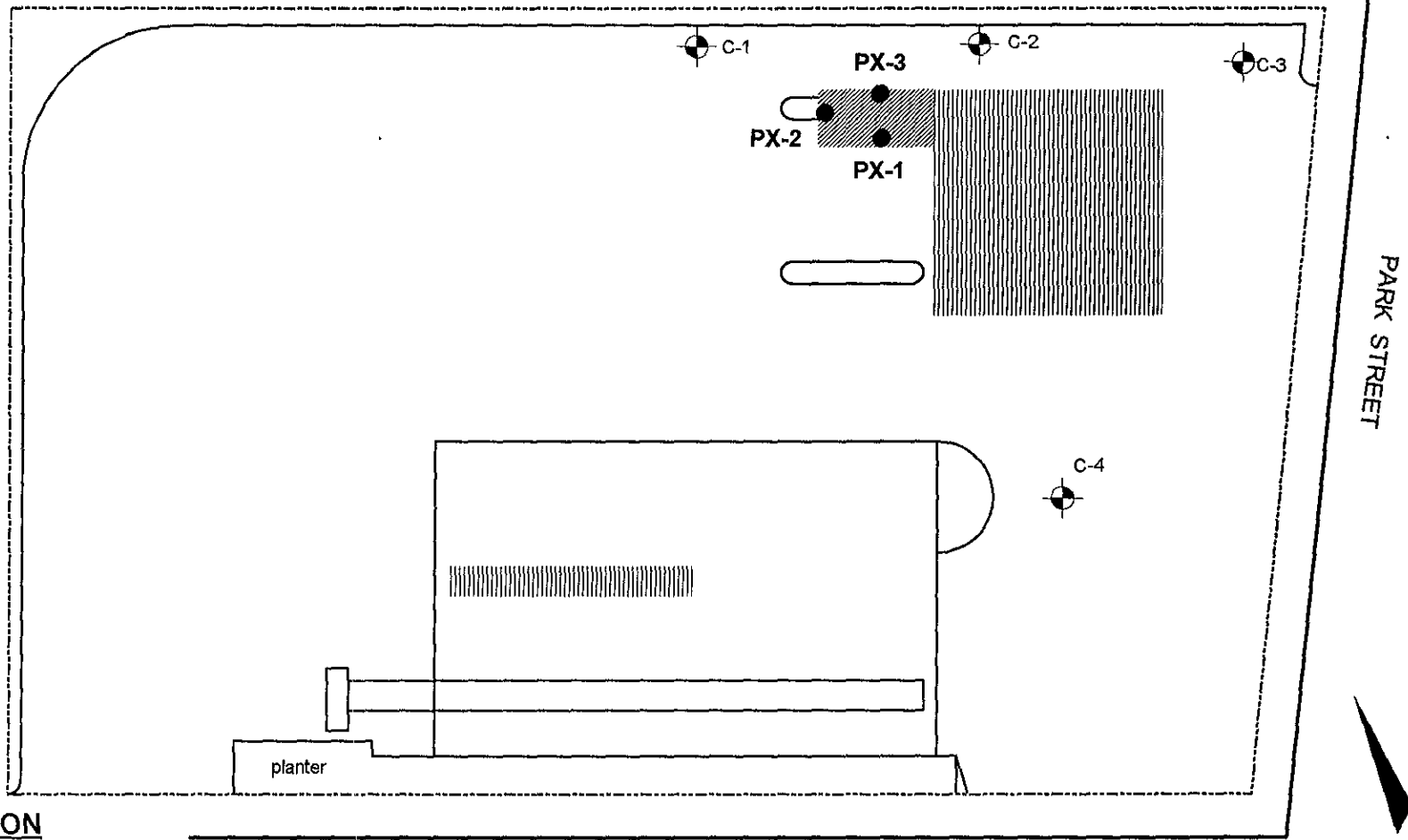
PROJECT NO.  
9-4463

DATE:  
1/86





DRAWN BY:  
WTJ

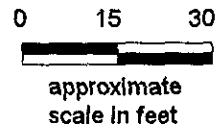
BASE MAP  
SIERRA CONTOUR MAP 8/94





**EXPLANATION**

-  Monitoring Well
-  Soil sample location and ID
-  Excavation limits
-  Previous Excavation limits



**PRODUCT ISLAND OVEREXCAVATION  
SOIL SAMPLING LOCATION MAP**

Former Chevron Service Station No. 9-4463  
1801 Park Street  
Alameda, California

FIGURE  
**3**

PROJECT NO.  
9-4463

DATE:  
1/96

DRAWN BY:  
WTJ

BASE MAP  
SIERRA CONTOUR MAP 8/94

**TABLE A**  
**UST Excavation, Product Piping, and Oil/water Separator Sampling Summary**  
**Former Chevron Service Station No. 9-4463**  
**1801 Park Street, Alameda, California**  
 Results in mg/Kg - parts per million (ppm)

**UST Excavation and Piping Sampling Results**

Sample ID	Depth (ft.)	Laboratory	Date	TPH-Gasoline	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	Lead
T-1-10.5	10.5	Sequoia	18-Oct-95	ND	ND	ND	ND	ND	ND	ND
T-1-7.0	7	Sequoia	18-Oct-95	37	0.053	ND	0.11	0.31	ND	5.1
T-2-11.0	11	Sequoia	18-Oct-95	ND	0.035	ND	0.0055	0.013	0.08	ND
T-3-10.5	10.5	Sequoia	18-Oct-95	8800	27	400	180	990	ND	ND
T-4-11.0	11	Sequoia	18-Oct-95	ND	0.022	ND	ND	0.0052	0.89	ND
T-5-10.5	10.5	Sequoia	18-Oct-95	ND	0.059	ND	ND	ND	0.26	ND
T-6-10.5	10.5	Sequoia	18-Oct-95	ND	ND	ND	ND	ND	0.25	ND
T-7-10.5	10.5	Sequoia	18-Oct-95	ND	ND	ND	ND	ND	0.64	ND
P-1-4.0	4	Sequoia	18-Oct-95	ND	ND	ND	ND	ND	ND	ND
P-2-4.0	4	Sequoia	18-Oct-95	ND	ND	ND	ND	ND	ND	ND

**Oil/water Separator Sampling Results**

Sample ID	Depth (ft.)	Laboratory	Date	TPH-Gasoline	Benzene	Toluene	Ethylbenzene	Xylenes	TRPH
OWS-N-8.0	8	Sequoia	31-Oct-95	1.7	ND	ND	ND	ND	ND
OWS-S-7.5	7.5	Sequoia	31-Oct-95	ND	ND	ND	ND	ND	ND

**TABLE A**  
**UST Excavation, Product Piping, and Oil/water Separator Sampling Summary**  
**Former Chevron Service Station No. 9-4463**  
**1801 Park Street, Alameda, California**  
 Results in mg/Kg - parts per million (ppm)

Sample ID	Depth (ft.)	Laboratory	Date	Cadmium	Chromium	Lead	Nickel	Zinc
OWS-N-8.0	8	Sequoia	31-Oct-95	ND	34	ND	31	18
OWS-S-7.5	7.5	Sequoia	31-Oct-95	ND	30	ND	30	23

TPH-Gasoline = Total Petroleum Hydrocarbons calculated as Gasoline.

TRPH = Total Recoverable Petroleum Hydrocarbons (SM 5520 E&F Mod.).

MTBE = Methyl t-Butyl Ether.

ND = Not detected at or above laboratory detection limits.

NA = Analysis not requested.

**TABLE B**  
**Overexcavation Sampling Summary**  
**Former Chevron Service Station No. 9-4463**  
**1801 Park Street, Alameda, California**  
 Results in mg/Kg - parts per million (ppm)

**Piping Overexcavation Sampling Results**

Sample ID	Depth (ft.)	Laboratory	Date	TPH-Gasoline	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE
PX-1-8.0	8	Sequoia	31-Oct-95	1500	ND	37	25	130	ND
PX-2-7.5	7.5	Sequoia	31-Oct-95	2200	ND	47	43	250	ND
PX-3-7.5	7.5	Sequoia	31-Oct-95	310	1.7	14	6.8	35	ND

TPH-Gasoline = Total Petroleum Hydrocarbons calculated as Gasoline.

MTBE = Methyl t-Butyl Ether.

ND = Not detected at or above laboratory detection limits.

## Cumulative Table of Well Data and Analytical Results

Vertical Measurements are in feet.

Analytical results are in parts per billion (ppb)

DATE	Well Head Elev.	Ground Water Elev.	Depth To Water	Notes	TPH-Gasoline	Benzene	Toluene	Ethyl-Benzene	Xylene	MTBE
<b>C-1</b>										
08/25/95	12.93	--	--	Dry	--	--	--	--	--	--
11/07/95	12.93	--	--	Dry	--	--	--	--	--	--
02/14/96	12.17	7.95	4.22	--	1200	19	5.9	130	96	<12
05/24/96	12.17	7.22	4.95	--	610	11	3.0	70	35	<5.0
08/01/96	12.17	5.67	6.50	--	65	7.4	5.7	7.1	11	<2.5
12/11/96	12.17	6.75	5.42	--	640	9.4	2.6	72	35	13
<b>C-2</b>										
08/25/95	11.96	5.62	6.34	--	<50	<0.5	<0.5	<0.5	<0.5	--
11/07/95	11.96	4.11	7.85	--	1500	440	<10	<10	67	1200
02/14/96	11.61	7.79	3.82	--	<50	<0.5	<0.5	<0.5	<0.5	56
05/24/96	11.61	7.21	4.40	--	<50	<0.5	<0.5	<0.5	<0.5	<2.5
08/01/96	11.61	5.61	6.00	--	<50	0.93	<0.5	<0.5	0.65	24
12/11/96	11.61	7.78	3.83	--	<50	<0.5	<0.5	<0.5	<0.5	<2.5
<b>C-3</b>										
08/25/95	11.70	5.55	6.15	--	<50	<0.5	<0.5	<0.5	<0.5	--
11/07/95	11.70	4.10	7.60	--	<500	<5.0	<5.0	<5.0	<5.0	5200
02/14/96	11.36	7.36	4.00	--	<50	<0.5	<0.5	<0.5	<0.5	54
05/24/96	11.36	6.66	4.70	--	<50	<0.5	<0.5	<0.5	<0.5	10
08/01/96	11.36	5.38	5.98	--	<50	1.2	1.9	1.5	4.9	53
12/11/96	11.36	7.44	3.92	--	<50	<0.5	<0.5	<0.5	<0.5	13

## Cumulative Table of Well Data and Analytical Results

Vertical Measurements are in feet.

Analytical results are in parts per billion (ppb)

DATE	Well Head Elev.	Ground Water Elev.	Depth To Water	Notes	TPH-Gasoline	Benzene	Toluene	Ethyl-Benzene	Xylene	MTBE
<b>C-4</b>										
08/25/95	12.87	6.15	6.72	--	<50	<0.5	<0.5	<0.5	<0.5	--
11/07/95	12.87	4.49	8.38	--	<50	<0.5	<0.5	<0.5	<0.5	74
02/14/96	12.37	--	--	--	--	--	--	--	--	--
05/24/96	12.37	--	--	--	--	--	--	--	--	--
08/01/96	12.37	5.67	6.70	--	<50	<0.5	<0.5	<0.5	<0.5	<2.5
12/11/96	12.37	6.66	5.71	--	<50	<0.5	<0.5	<0.5	<0.5	<2.5
<b>C-5</b>										
08/25/95	13.35	6.34	7.01	--	<50	<0.5	<0.5	<0.5	<0.5	--
11/07/95	13.35	5.05	8.30	--	<50	<0.5	<0.5	<0.5	<0.5	200
02/14/96	13.35	7.17	6.18	--	560	<0.5	<0.5	40	18	5.5
05/24/96	13.35	6.68	6.67	--	180	<0.5	<0.5	8.6	<0.5	<2.5
08/01/96	13.35	5.79	7.56	--	<50	<0.5	<0.5	<0.5	<0.5	<2.5
12/11/96	13.35	7.06	6.29	--	<50	<0.5	<0.5	<0.5	<0.5	45



# LOG OF EXPLORATORY BORING

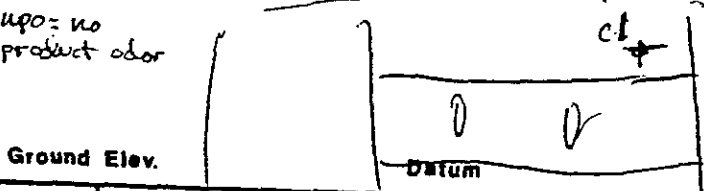
PROJECT No. F38-66. DATE 2-27-85 BORING  
 CLIENT GR Chevron Sheet C-1  
 LOCATION Park & Eagle Alameda  
 LOGGED BY BT DRILLER AAA of     

Field location of boring: known 450 yds Park & Eagle

Drilling method 8" HS Hole dia. 8"

Casing installation date BACKFILLED W/ BENTONITE TO 17'; 3" PVC SLAT 17-5'; BLANK TO SURFACE. SAND TO 5, BENTONITE TO 4', CONCRETE TO SURFACE.

Water level				
Time				
Date				



## DESCRIPTION

CONCRETE & 2' GRAVEL BASE  
 2' SP FINE SAND - Brown (7.54R 5/2), 0-5% clay, 5% silt, 90-95% fine sand, trace fine gravel - medium, damp up  
 4' Color changes to brownish yellow (104R 6/6) ~5% clay, gravel diminished  
 6' Moist to wet, upo  
 8' SC CLAYEY SAND - Brownish yellow (104R 6/6), 5% silt, 10-15% clay, 80-85% fine sand - medium dense, moist to wet, upo  
 10' SP FINE SAND - Brownish yellow (104R 6/6), 5% clay, 5% silt, 90% fine sand, slightly Fe stained - medium dense, wet, no prod odor  
 14' SC CLAYEY SAND - Brownish yellow (104R 6/6), 5% silt, 15% clay, 80% fine sand - medium dense, wet, upo  
 18' SC SANDY CLAY TO CLAYEY SAND - Brownish yellow (104R 6/6), 50% clay, 50% fine sand, trace silt - soft, wet, no product odor  
 HT: STO

Pocket Torrvane TSF	Pocket Penetrometer TSF	Blows/ft. or Pressure PSI	Type of Sample	Sample Number	Depth	Sample	Soil Group Symbol (U.S.C.S.)
					2		SP
					4		
					6		
					8		SC
		9/15/21	STP	90%	10		SP
					12		
		4/5/7	STP	100%	14		SC
					16		cy SC
2.0		9/11/13	STP	100%	18		SC
					20		
					22		
					24		
					26		
					28		
					30		
					32		
					34		
					36		

**DRAFT**

# LOG C-2 EXPLORATORY BORING

PROJECT No. 438-61 DATE 2-27-85  
 CLIENT GR Chevron  
 LOCATION Alameda  
 LOGGED BY ST DRILLER ART

BORING  
**C-2**  
Sheet  
of

field location of boring:

ing Mayfield  
443 9300

C-2

lands

Drilling method 8" HS

Hole dia. 8"

Casing installation data Boring cased to 15', bentonite  
15'-14', 3" PVC SLOT 14'-4', BLANK TO SURFACE  
SAND TO 4', BENTONITE TO 3', CONCRETE TO  
SURFACE. CONSTRUCTION PER OREGON MAYFIELD (ACF

Ground Elev.

Datum (114)

Pocket Torrvane TSF	Pocket Penetrometer TSF	Blows/ft. or Pressure PSI	Type of Sample	Sample Number	Depth	Sample	Soil Group Symbol (U.S.C.S.)	DESCRIPTION
					2		SP	CONCRETE & 2" GRAVEL BASE
					4			FINE SAND - Brown (7.5YR 5/2) 0-50% clay, 5% silt, 90-95% fine sand, trace fine gravel - med dense, damp, no prod odor
					6			4.5' color change to brownish yellow (10YR 6) slight increase clay content to 5-10%, no gravel
					8		SC	CLAYEY SAND - Grayish brown (10YR 5/2), 5% silt, 15-20% clay, 75-80% fine sand - med dense, moist to wet, slight product odor (6-7) - trace medium sand
		13/14/23	SP 25%		10			
					12			
					14			
	2.5	4/5/7	SP 80%		16		SC	CLAYEY SAND TO SANDY CLAY - Grayish brown (10YR 5/2), 0-5% silt ~ 50% clay, ~ 50% fine sand - soft, wet, no product odor
					18			
					20			HT: 510
					22			
					24			

**DRAFT**