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Engineering and Environmental Compliance Services License # 697833 (A-Haz)

Cover Letter Subject: Data Gap Work Plan, dated October 20, 2015 3884 Depot Road, Hayward Site Cleanup Program Case RO0002499

PERJURY STATEMENT

ACEH File name: RO 2499 WP R 2015-10-20

In accordance with the following Alameda County Environmental Health (ACEH):

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 Data Gap Work Plan, dated October 20, 2015, ACEH File name: RO 2499_WP_R_2015-10-20 is true and correct to the Best of my knowledge.

Trans Tech Consultants legally authorized representative



Legally authorized representative of S&A Investment Holdings LLC, the property owner.

Signature: Htt Print Name: Kevin Singh Title: Owner Date: 10/26/15

www.transtechconsultants.com

930 Shiloh Rd., Bldg. 44, Suite J • Windsor, California 95492 • Phone: 707-837-8408 • Fax: 707-837-7334



TRANS TECH CONSULTANTS

Engineering and Environmental Compliance Services License # 697833 (A-Haz)

Data Gap Work Plan

October 20, 2015

TTC Job No.: 2548.01

Former AAA Truck Parts 3884 Depot Road, Hayward, CA

Prepared for:

Mr. Mark E. Detterman, PG, CEG Alameda County Environmental Health 1131 Harbor Bay Parkway, Suite 250, Alameda, CA 94502

Prepared by:

Trans Tech Consultants 930 Shiloh Road, Bldg. 44, Suite J Windsor, California 95492 707-837-8408

Prepared by:

OF CAL

Matthew E. Donohue, P.E. Civil Engineer C57219



Bill C. Wiggins, P.E. Civil Engineer 46344

TABLE OF CONTENTS

<u>Section</u>		Page
1.0	Introduction	1
2.0	Select Background Information	1
3.0	Focused Site Conceptual Model	1
	3.1 Geology and Hydrogeology	1
	3.2 Historic Contaminant Findings	2
4.0	Proposed Scope of Work	3
	4.1 Hazardous Waste Storage Slab and Near Location of Boring P-3	4
	4.2 Southern Parts Storage Area	4
	4.3 Central Outdoor Storage Area.	5
	4.4 Groundwater Monitoring Wells	5
5.0	Laboratory Chemical Analysis	5
6.0	Closure	6

Attachments:

Table 1,	Historic Groundwater Analytical Data
Plate 1,	Site Location Map
Plate 2,	Site Map with Cross Section Line
Plate 3,	Site Cross Section A-A'
Plate 4,	Soil Map of Organic Compounds
Plate 5,	Soil Map of Metals
Plate 6,	Groundwater Map of Organic Compounds
Plate 7,	Groundwater Map of Metals
Plate 8,	Proposed Boring Locations
Appendix A	Disposal Documentation

cc: S&A Investment Holdings LLC, 3890 Depot Rd, Hayward, CA 94545



1.0 Introduction

This Data Gap Work Plan has been prepared by Trans Tech Consultants (TTC) for the subject property located at 3884 Depot Road, Hayward, CA. The subject property is approximately located as shown on the Site Location Map, Plate 1. Site features are shown on the Site Plan, Plate 2. The purpose of this work plan and the proposed work is to comply with the directives of Alameda County Environmental Health (ACEH), as presented in their November 6, 2014 and July 9, 2015 correspondence. This document also presents a brief discussion of currently available documentation in the ACEH digital archive for the subject site.

The site is located in an area used for industry (including automotive salvage), transportation, warehousing, sewage treatment plant, gas-fired power generation, and salt ponds.

2.0 Select Background Information

The site was owned by AAA Truck Parts and operated as an auto parts salvage site from 1960 to 2014. In 2014, the site was sold and is leased to a wooden pallet company. The automotive salvage materials have been removed from the site.

The site was used for decades as an automotive salvage yard creating the potential for soil and ground water contamination with automotive fluids and parts. Hazardous waste was collected in containers and drums. In May of 1999 a Notice of Violation for illegal storage and disposal of hazardous materials was issued by ACEH to the owner of AAA Truck Parts and Wrecking. Eight shallow soil borings (P-1 through P-8) were conducted (Engeo 01/04/2002). Following the analytical results from the samples collected, three monitoring wells were installed in 2002. One of the wells was installed near the hazardous waste storage area slab (MW-1), another was drilled in an area of suspicious soil staining (MW-2), and the third (MW-3) was drilled on property leased by AAA Truck Parts immediately east of the subject site (Engeo 07/15/2003). In January and February 2015 CDMS performed nine soil borings (Z1 through Z9) and collected groundwater samples from wells MW-2 and MW-3 (CDMS 5/3/2015).

3.0 Focused Site Conceptual Model

3.1 Geology and Hydrogeology

The site is in the east-central alluvial plain of the San Francisco Bay physiographic subregion and is underlain by a thick layer of Quaternary alluvium. The nearest surface water is a slough about 400-feet west of the site that flows to the northwest about a mile to the San Francisco Bay (see Plate 1).

Three shallow monitoring wells (MW-1 through MW-3) were installed in 2002 (see Plate 2). Two to three-feet of gravelly fill was logged overlying an approximately 4 to 10-foot thick Silty Clay layer. Soil consisting of varying percentages of silts, clays, and sands was logged beneath the clay layer (see Plate 3, Site Cross Section).



The boring log for well MW-1 indicates groundwater was encountered near the surface, and the boring logs for wells MW-2 and MW-3 indicate that groundwater was encountered at 9 and 8 feet, respectively, below ground surface (fbg). During the 01/12/03 monitoring event, depth to water was found as below:

Well	fbg
MW-1	4.05
MW-2	5.32
MW-3	4.72

Depth to water was not reported in the CDMS report of May 3, 2015. No top of casing elevation survey, and no groundwater contour maps, were found in ACEH's files for this site.

The USGS topographic map indicates that the ground in the area slopes down westerly. A nearby ACEH site, 3152 Depot Road, indicates groundwater flows westerly to southwesterly. We infer that groundwater flows westerly to southwesterly at the subject site (see Site Map, Plate 2).

Offsite well MW-3 was destroyed prior to 2015.

3.2 Historic Contaminant Findings

Item No. 2 in the ACEH correspondence of November 6, 2014 requests a comprehensive table of soil and groundwater analytical data. For groundwater, please see Table 1 for Historic Groundwater Analytical Data. For soil, we prepared two site maps that include data tables, allowing a location-reference view of the historical sampling results. Where analytes were not detected, the detection limit is shown.

Soil:

Plate 4 presents the soil map of organic compounds. Down to one-fbg, oils (Total Petroleum Hydrocarbons as Motor Oil or TPHmo, and TPH as Diesel or TPHd) were found at concentrations above the San Francisco Bay Regional Water Quality Control Board's (SFRWQCB) Environmental Screening Level (ESL, 500 milligrams per kilogram or mg/Kg for TPHmo, and 110 mg/Kg for TPHd) in borings P-2, P-7, Z3, Z5, Z7, Z8, and Z9. Soils were sampled at 3-fbg in borings P-2, P-7, and P-8 and soils above the ESL for TPHmo were only found in boring P-7. Wells MW-1 through MW-3 were sampled at 7-fbg and no soils above the ESL for oils were found.

Plate 5 presents the soil maps of metals. Down to one-fbg, zinc was found at concentrations above the ESL (600 mg/Kg) in borings P-3, P-6, Z1, Z5, Z8, and Z-9. Soils were sampled at 3-fbg in borings P-2, P-3, and P-6 and soils above the ESL for zinc were only found in boring P-2. Wells MW-1 through MW-3 were sampled at 7-fbg and no soils above the ESL for zinc were found.

In general, soil contamination above the ESL was detected in borings down to one-fbg. At 3-fbg, much less contamination was found, and by 7-fbg contamination was not found.



At boring P-3, for example, zinc concentrations declined from 1,100 mg/Kg at 1-fbg to 36 mg/Kg at 3-fbg. This pattern of soil contamination is what we expect from historic surface spills and parts evenly distributed around the site from vehicles being dismantled.

The contaminants of concern (COC) in soil are oil (primarily TPHmo) and zinc. <u>Groundwater:</u>

Table 1 presents Historic Groundwater Analytical Data. Low oil impact was found in the January 23, 2003 sampling data from the groundwater monitoring wells MW-1 through MW-3. But the two 2015 sampling events indicated high levels of oil impact. This may be because these monitoring wells are only sealed down to 4.75-feet, providing a potential conduit from the gravel surface, down through the Silty Clay layer, and down to water-bearing sandy materials (see Plate 3, Site Cross Section). Records of misuse indicate that these wells have not been kept properly sealed during the intervening 12-years and the increased oil impact found may be due to surface water entry at the well lid.

Oils (TPHmo and TPHd) were detected above the ESL (100 micrograms per liter, ug/L) in borings P-1 through P-3 on November 15, 2001 and in wells MW-1 and MW-2 on January 12 and February 12, 2015. MTBE was detected above the ESL (5 ug/L) in well MW-1 on January 23, 2003 and in wells MW-1 and MW-2 on January 12 and February 12, 2015.

Plate 6 presents the groundwater map of organic compounds and includes the most recent groundwater analytical data for each groundwater sampling location.

Plate 7 presents the groundwater map of metals and includes the highest concentrations ever found at each sampling location. Metals, including zinc, have not been detected above the ESLs in groundwater.

The COC in groundwater are oil (primarily TPHmo) and MTBE.

4.0 Proposed Scope of Work

In general, soil contamination above the ESL was detected in borings down to 1-fbg at most locations, therefore additional lateral definition of shallow soils is not proposed except where proposed borings are located outside of the historic boring field. Where shallow soil samples are proposed, the soil sample at 0.5-fbg will be run and the deeper samples held pending results. If the sample at 0.5-fbg returns results less than the ESL for the COC, the deeper samples will not be analyzed.

Historic boring locations are approximately shown on historic reporting maps, but seem to vary somewhat depending upon the map. Therefore, instead of proposing to offset borings 10-feet from prior boring locations as suggested in the ACEH correspondence of November 6, 2014, TTC suggests a 20-foot offset to ensure that we won't duplicate previous work.

The borings will be drilled using a limited access, portable drill rig or by means of hand auger equipment. Our geologist will observe the drilling. Soil samples will be collected for classification and field screening using a 2.0-inch inside diameter split spoon sampler lined with clean stainless steel sample tubes.



If hand augering methods are used, soil samples will be collected continuously for classification. Soil samples will be classified in accordance with the Unified Soil Classification System and recorded on Boring Logs. We will screen soil samples for VOCs using a photo ionization detector (PID). PID readings will be recorded on the Boring Logs.

Soil samples collected for laboratory chemical analysis will be recovered in pre-cleaned stainless steel tubes. Upon recovery, the sample tubes will then be capped with non-adhesive Teflon tape and plastic caps, labeled, placed on ice, and transported under chain-of-custody to a laboratory that is State-certified for the analyses requested.

Grab groundwater samples will be collected for laboratory chemical analysis using a disposable bailer and transferred to the appropriate containers supplied by the laboratory. Groundwater samples will be labeled, stored on ice, and transported with the soil samples under chain-of-custody documentation.

Clean augers will be used for each boring and sampling equipment will be cleaned with a phosphate free detergent solution and double rinsed with clean water between sampling events. The soil cuttings generated by the investigation will be placed into 55-gallon drums labeled with non-hazardous waste designations and stored onsite, pending disposal. Rinse water generated by the field investigation will be pumped and contained into 55-gallon drums labeled with non-hazardous waste designations and stored onsite, pending disposal.

At the completion of drilling activities, the borings will be sealed using cement bentonite grout.

4.1 Hazardous Waste Storage Slab and Near Location of Boring P-3

Shallow soil contamination in this area is shown by borings P-3, Z6, Z7, Z8, and Z9. To define the depth of soil contamination, and lateral soil contamination to the west and south, we propose the following three soil borings (see Plate 8, Proposed Boring Locations).

One soil boring located one-foot northeast of the slab would be sampled at 4-fbg and analyzed for TPH as gasoline (TPHg), TPHd, TPHmo, and zinc.

One soil boring located approximately 20-feet south of boring P-3 would be sampled at 0.5,1, and 4-fbg and analyzed for TPHmo and zinc.

One boring approximately 20-feet west of boring P-3 (at the western site property boundary) will be sampled at 0.5, 1, and 4-fbg and then advanced deeper until groundwater is found and a groundwater grab sample collected. The soil samples will be tested for TPHmo and zinc, and the groundwater grab sample will be tested for the above analytes as well as for TPHg, benzene, toluene, ethylbenzene, and xylenes (BTEX) and Methyl tert-Butyl Ether (MTBE).

4.2 Southern Parts Storage Area

Near surface soil contamination in this area is shown by borings Z4, Z5, and P-7. To define the depth of soil contamination, and lateral soil contamination to the east and south, we propose the following four soil borings (see Plate 8, Proposed Boring Locations).



Two soil borings located approximately 20-feet to the east and south of boring Z5 will be sampled at 0.5, 1, and 4-fbg and analyzed for TPHmo and zinc.

One soil boring located approximately 20-feet to the west of boring P-7 will be sampled at 4-fbg and analyzed for TPHmo and zinc.

One soil boring located at approximately 20-feet north of boring Z4 will be sampled at 4-fbg and analyzed for TPHmo and zinc.

4.3 Central Outdoor Storage Area

Near surface soil contamination in this area is shown by borings P-2, P-5, P-6, and Z3, with boring P-5 defining the northern extent of zinc contamination found in boring P-6. To define the depth of soil contamination, and lateral soil contamination to the east, we propose the following four soil borings (see Plate 8, Proposed Boring Locations).

One soil boring located approximately 20-feet to the east of boring P-6 will be sampled at 0.5, 1, and 4-fbg and analyzed for TPHmo and zinc.

One soil boring located approximately 20-feet to the west of boring P-2 will be sampled at 4-fbg and analyzed for TPHmo and zinc.

One soil boring located approximately 20-feet to the south of boring P-2 will be sampled at 4-fbg and analyzed for TPHmo and zinc.

One soil boring located approximately 20-feet to the north of boring Z3 will be sampled at 0.5, 1, and 4-fbg and analyzed for TPHmo and zinc.

4.4 Groundwater Monitoring Wells:

At wells MW-1 and MW-2, install locking well seals and install bolts and gaskets in the well vault lids.

Redevelop wells MW-1 and MW-2 prior to sampling.

Sample groundwater monitoring wells MW-1 and MW-2, waiting 72-hours between redevelopment and sampling before to allow remaining sediment to settle. Analyze groundwater for TPHg, TPHd, TPHmo, BTEX, MTBE, and zinc.

5.0 Laboratory Chemical Analysis

Analyze select samples for TPHg, TPHd, and TPHmo by EPA Method 8015M. Analyze select samples for BTEX and MTBE by EPA Method 8021B. Analyze samples for zinc by EPA Method 6010B. Analytical testing may be modified based upon conditions observed in the field.



6.0 Closure

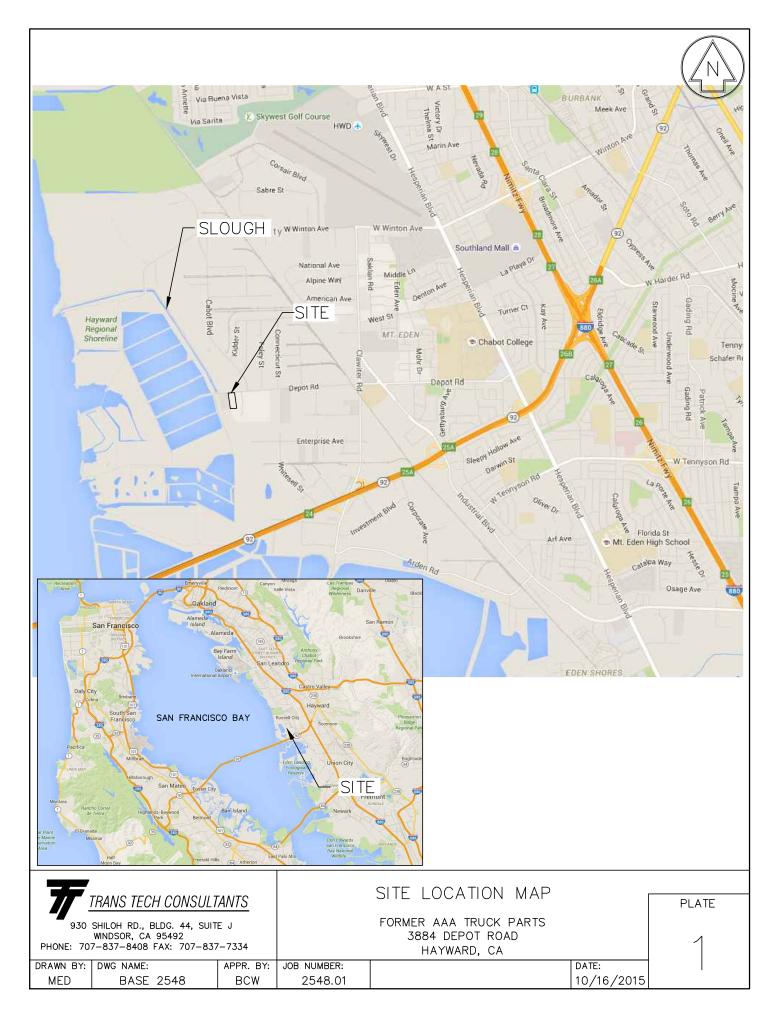
We will proceed with the field work after ACEH has reviewed and approved the work plan.

After completion of the field work and receipt of the laboratory analytical results, a report will be prepared presenting the details of our investigation.

As requested by the ACEH in their July 9, 2015 Letter, disposal documentation for the 300 gallons reported to be pumped from wells MW-1 and 2 (CDMS 5/3/2015) is attached in Appendix A.



Table 1								
	Hist	oric Gro	oundwate	er Analy	tical Dat	ta		
ug/L	ug/L							
DATE	SAMPLE ID	TPHd	TPHmo	TPHg	BENZENE	MTBE	ZINC	
11/15/2001	GW-1 (P-1)	1900	9500	<50	<1.0	not tested	<50	
11/15/2001	GW-2 (P-2)	110	<250	<50	<1.0	not tested	<50	
11/15/2001	GW-3 (P-3)	1500	2200	2200	110	not tested	<50	
1/23/2003	MW1	76	<250	<50	<0.5	71	<50	
1/12/2015	MW1	2400	4300	<50	<0.5	42	46	
2/12/2015	MW1	3500	3800	<50	<0.5	40	<20	
1/23/2003	MW2	<50	<250	<50	<0.5	1.3	<50	
1/12/2015	MW2	3100	3400	<50	<0.5	9.3	68	
2/12/2015	MW2	2600	2200	<50	<0.5	17	<20	
1/23/2003	MW3	53	<250	<50	<0.5	<0.5	<50	

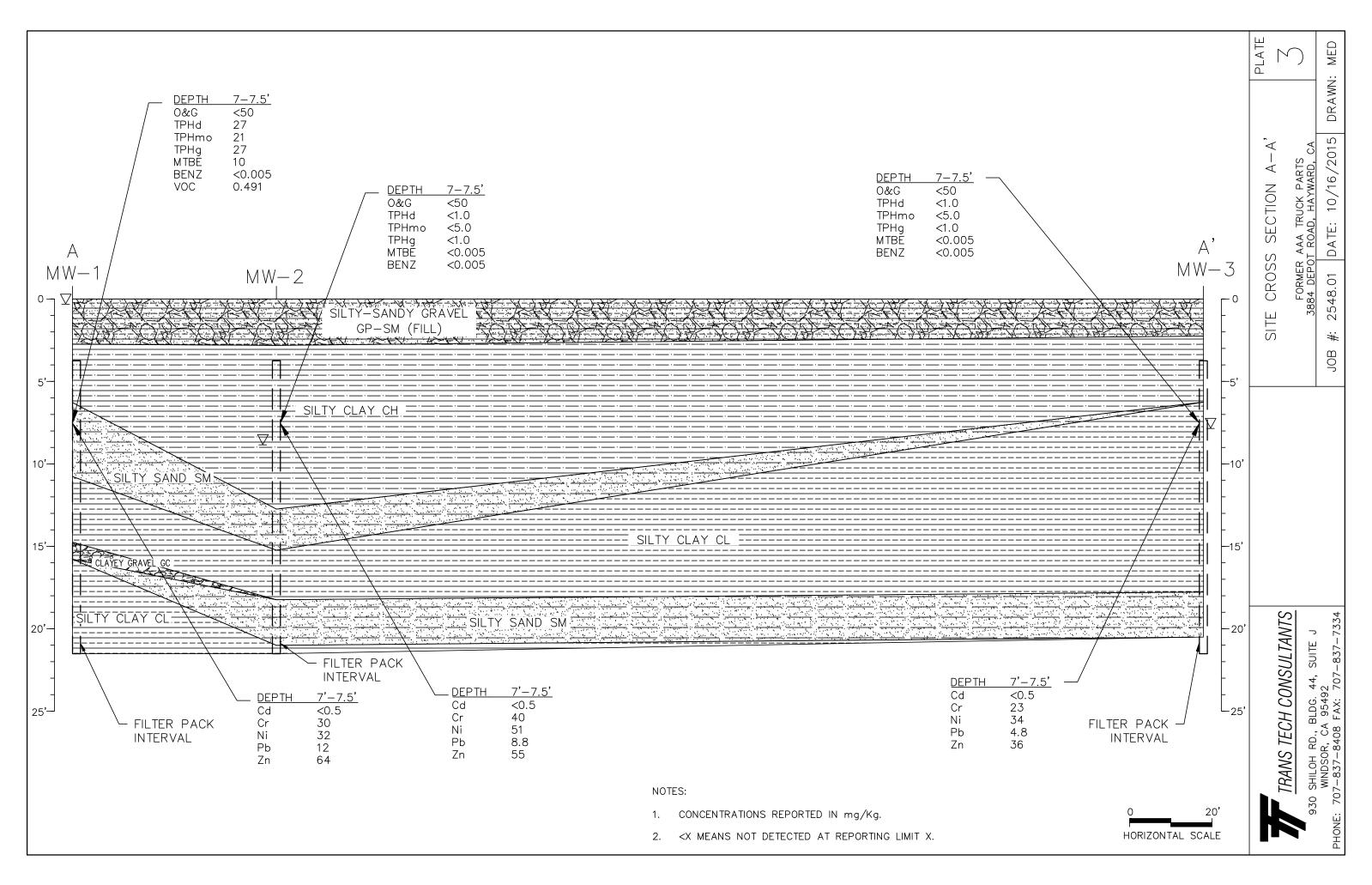


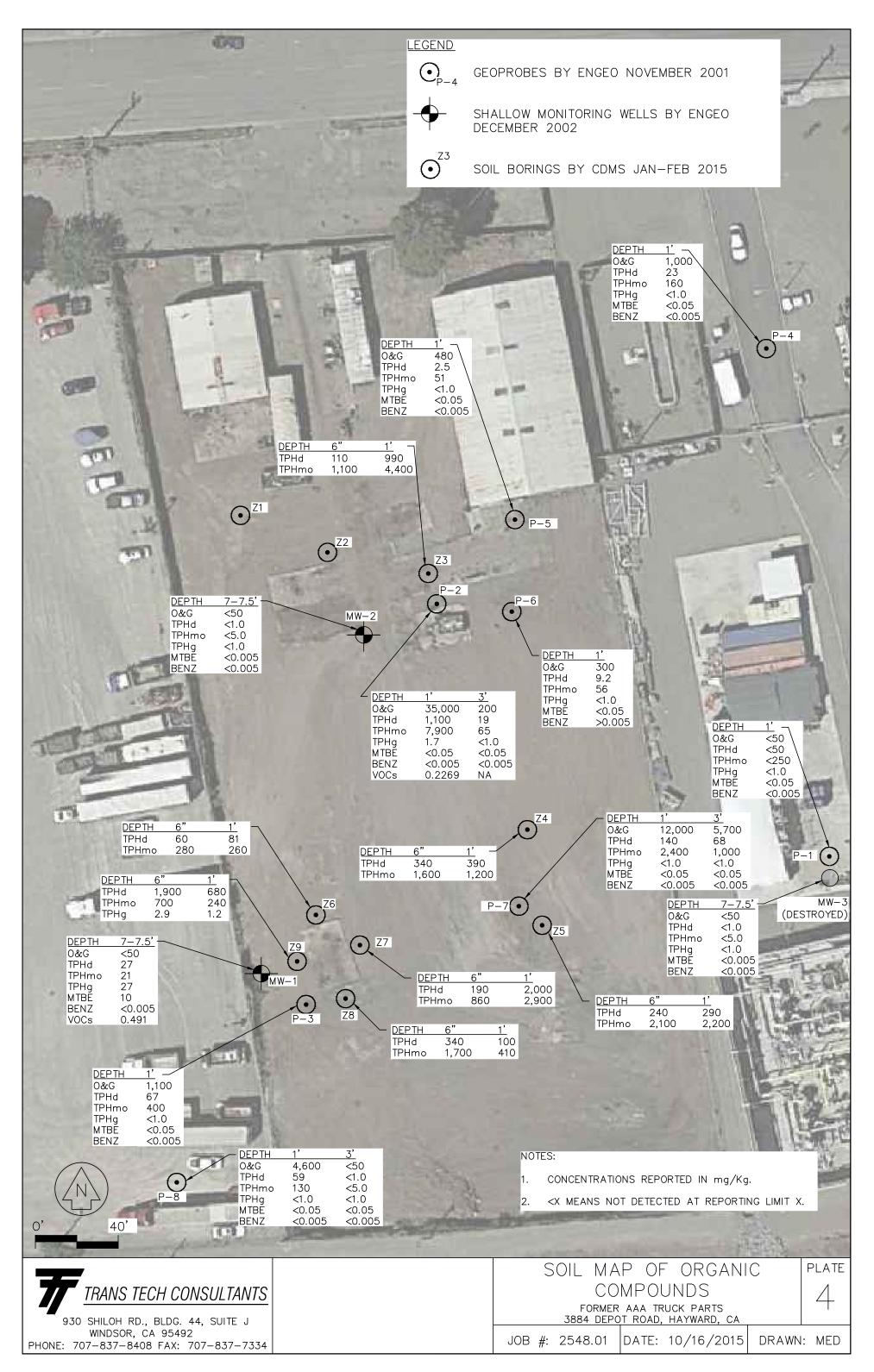


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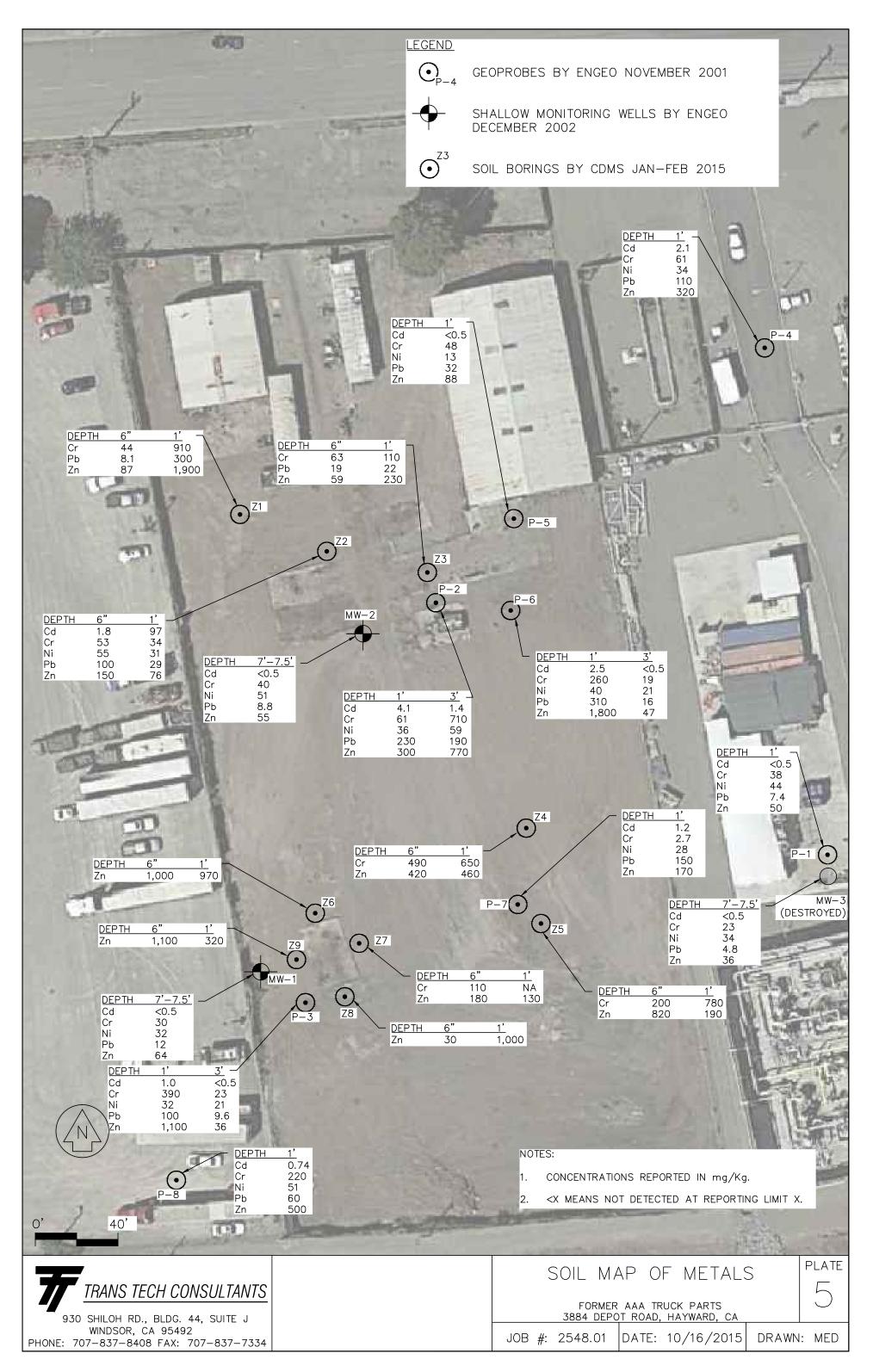
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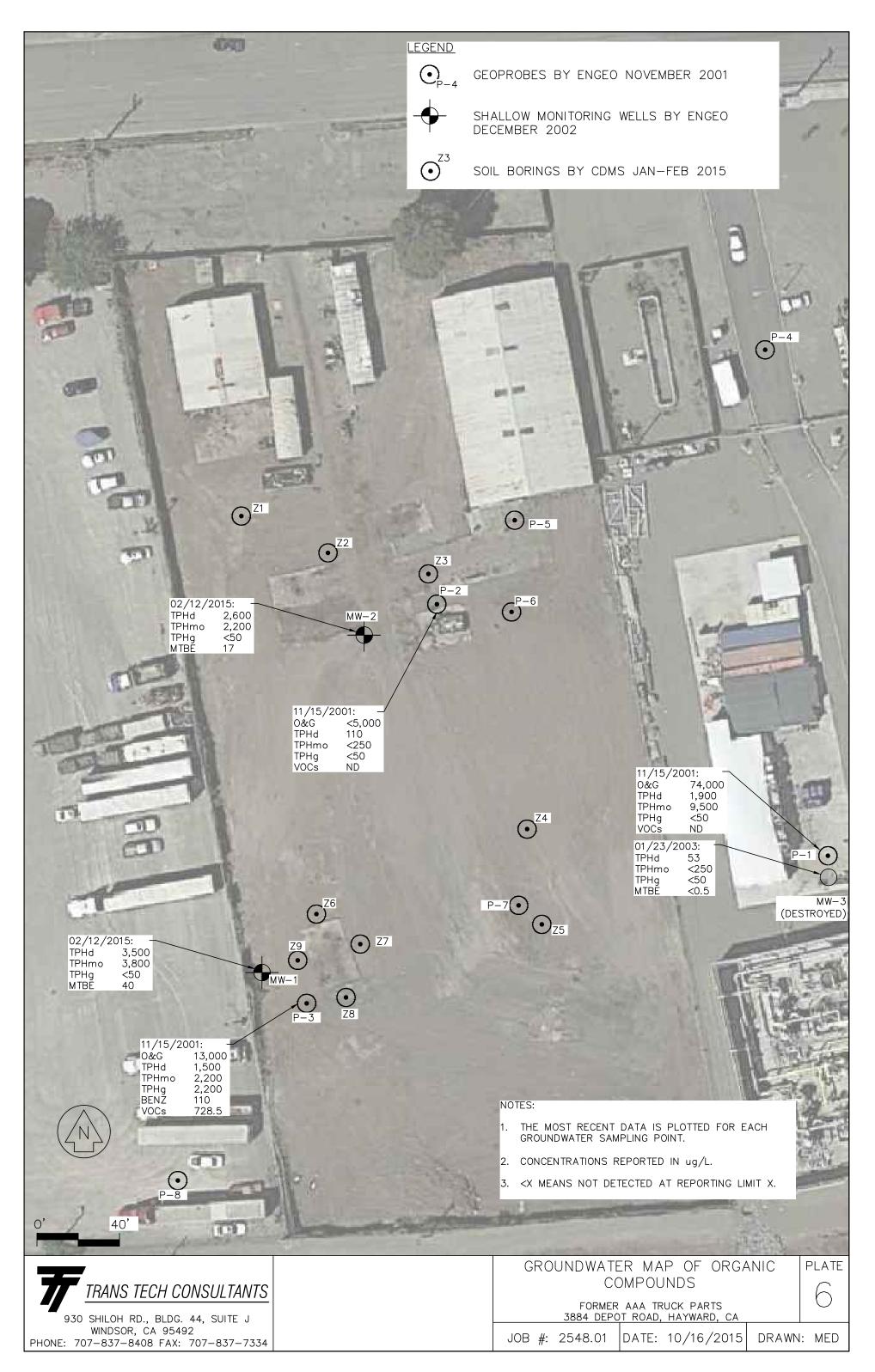
		当時に語して
	SITE MAP with CROSS PI	LATE
TRANS TECH CONSULTANTS	SECTION LINE A-A'	$2 \mid$
930 SHILOH RD., BLDG. 44, SUITE J	FORMER AAA TRUCK PARTS 3884 DEPOT ROAD, HAYWARD, CA	
WINDSOR, CA 95492 PHONE: 707-837-8408 FAX: 707-837-7334	JOB #: 2548.01 DATE: 10/16/2015 DRAWN:	MED



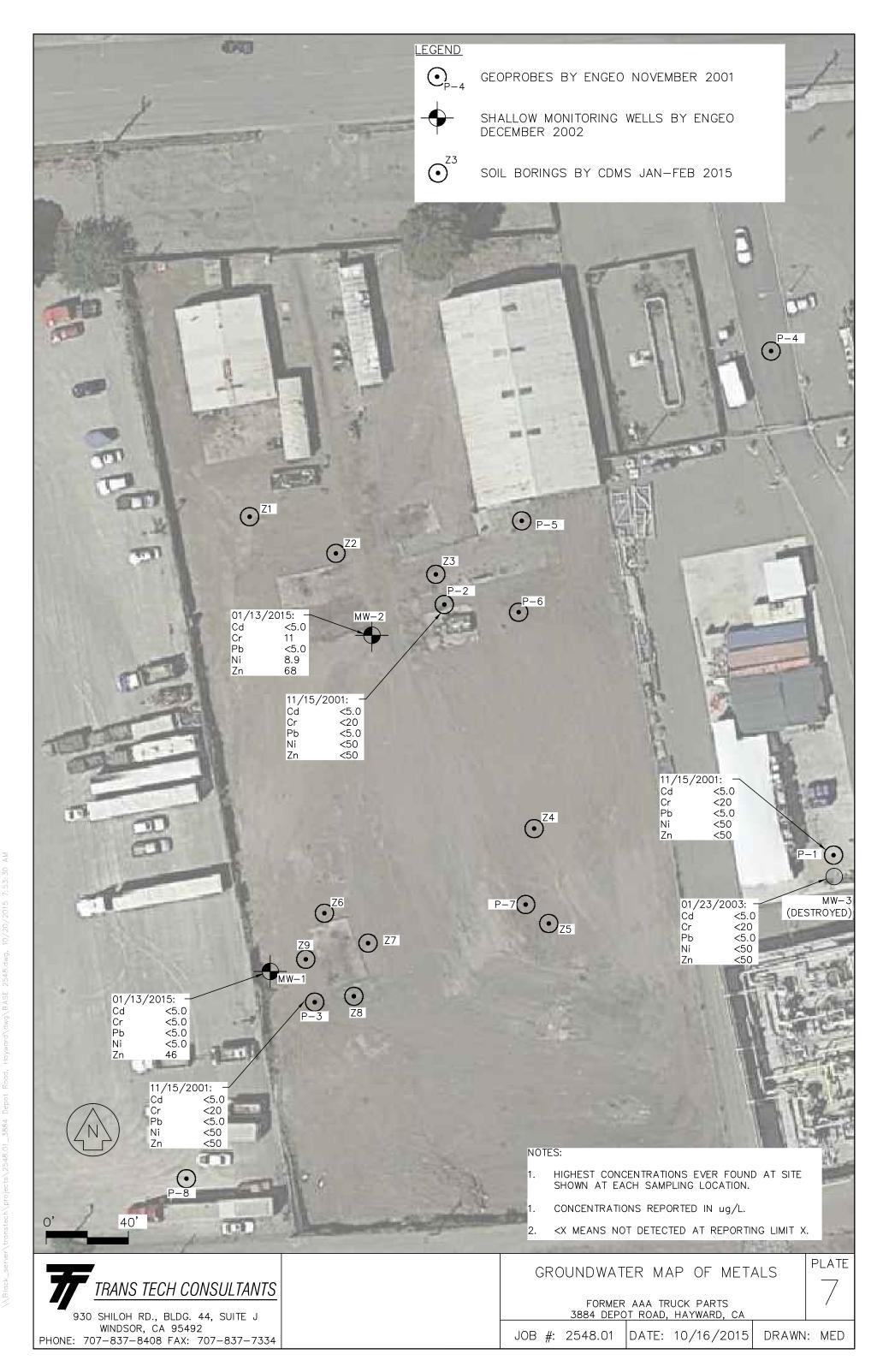


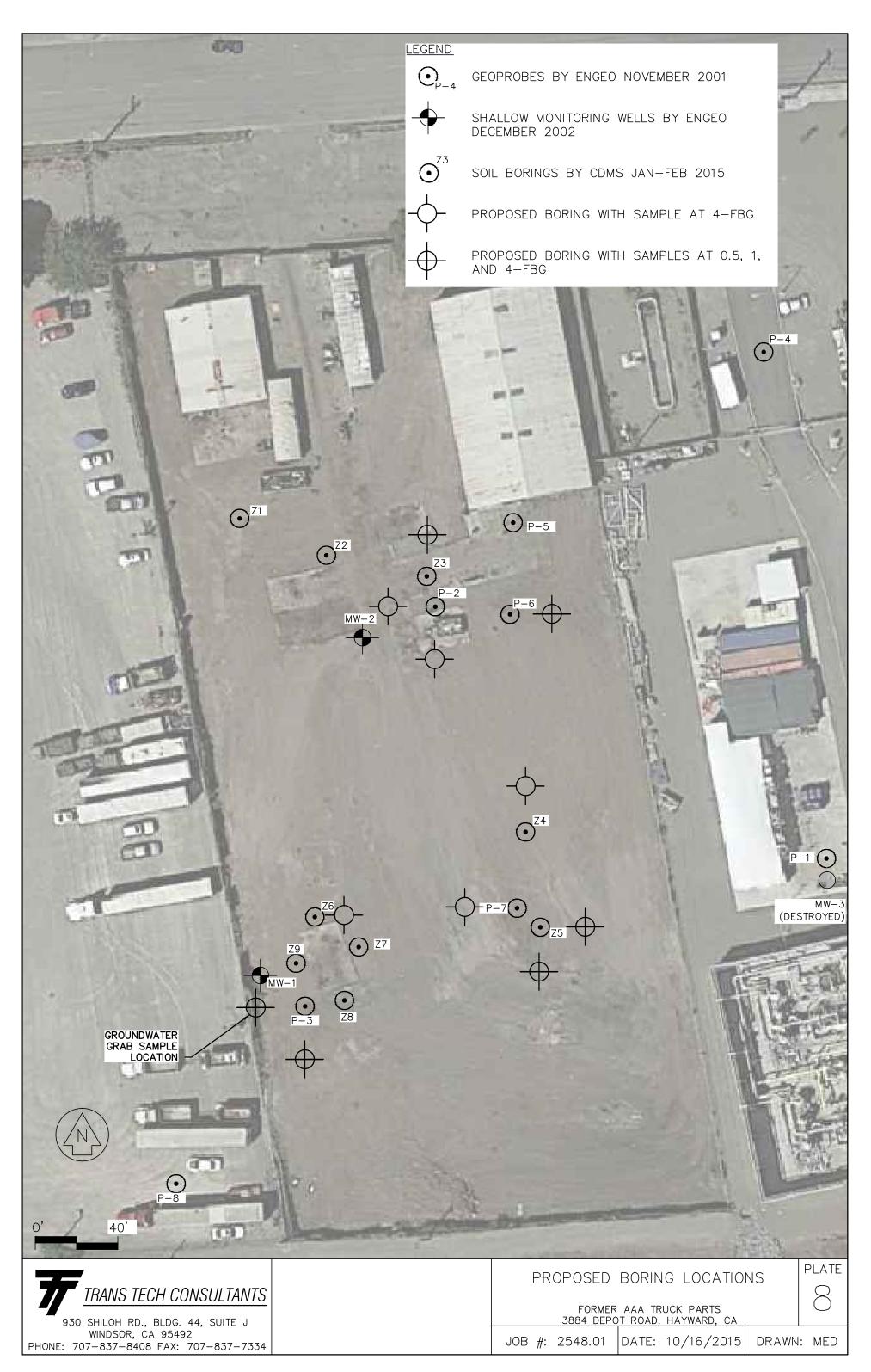
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APPENDIX A



SCALE TAG#

NON-HAZARDOUS WASTE MANIFEST

	GEN	ERAT	FOR INFORM	MATION	\mathbf{C}	USTOMER/BIL	LING INFOR	MATION
Generator Name: ECONOMY TRUCKING SERVICES			Billing Nan	ne: ECONOMY 7	RUCKING SERV	ICES, INC.		
Addres	s: <u>DEPO</u>	T ROA	D		Address:	PO BOX 525		
City:	HAYWA	RD	County:	ALAMEDA	City:U	NION CITY	County:	ALAMEDA
State:	tate: <u>CA</u> Zip: <u>94545</u>		State:C	State: CA		94587		
Site Lo	cation (if di	ifferent):					
А	pproval #		D	escription of Waste)	Volume/Weight	Expiration Date	Container Type
PHLF15439			NON-HAZA	RDOUS GROUI	NDWATER	TONS	07/17/2016	
			S	OLIDIFICATION	۸			

*Attach Additional Sheet if necessary

I hereby certify that the above-described materials are non-hazardous wastes as defined by 40 CFR 261 or any applicable state law. Further, that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Generator/Authorized Ag	ent Name	Signature	Date Shipped
• • • • • • •	TRANSP	ORTER INFORMATION	
Transporter Name:		License Plate#	
Transporter Address:		Truck Number	
	· · · ·	Phone Number	· · · · · · · · · · · · · · · · · · ·
this vehicle is the waste ic	t Name (Print First, Last Name)		ste while in my custody. The waste transported in Date Delivered
	**DISPOSA	AL SITE INFORMATION	**
Site Name:	POTRERO HILLS LANDFILL,	INC.	Phone No707-432-4627
Site Address:	3675 POTRERO HILLS LANE	SUISUN, CA 94585	Truck Weight:
I hereby acknowledge rec	eipt of the above-described materi	als.	

Potrero Hills Landfill 3675 Potrero Hills Lane Suisun, CA 94585 Phone: 707.432.4622 Fax: 707.426.5013



FOR OFFICE USE ONLY

APPROVAL NUMBER:

EXPIRATION DATE:

APPROVED BY:

ECIAL WASTE PROFILE

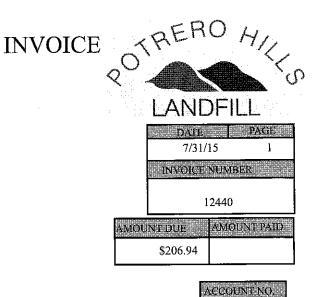
prmation utilized for completion of this form must originate from an authorized representative of the generator of the waste material. The information on this form must be COMPLETELY FILLED OUT, TYPE WRITTEN, and the form must be SIGNED BY AUTHORIZED REPRESENTATIVE.

GENERATOR INFORMATION		B. CUSTOMER/BILLING INFORMATION		
enerator Name: Economy Truckir	ig Services, Inc.	1. Billing Name: Economy Trucking Services, Inc.		
ddress: P.O. Box 525		2. Address: P.O. Box 525		
ity: Union City	: Union City County: Alameda		County: Alameda	
tate: CA	Zip: 94587	State: CA	Zip: 94587	
ite Location (if different): Depot Re	oad, Hayward	3. Contact Name: Kevin Singh		
ontact Name: Kevin Singh		4. Phone Number: 510-733-9100	5. Fax Number: 510-799-9600	
hone Number: 510-733-9100	6. Fax Number: 510-733-9600	6. Email Address: kevin@economytruc	king.net	
mail Address: kevin@economytru	cking.net	7. Is there a service agreement on file?		
ate Facility ID # (if applicable):		8. Agent / Consultant:		
ate Waste Code (if applicable):		9. Letter of Authorization: YES	NO	
TRANSPORTER/SHIPPI	NG INFORMATION	D. WASTE STREAM INFOR	MATION	
ame: Economy Trucking Services	, Inc.	1. Common Name of Material or Waste	e Stream: Water	
treet Address: P.O. Box 525	· · ·			
ity: Union City State:	CA Zip: 94587	2. Detailed Description of Process or H	low Generated (Attach additional sheet if needed):	
hone Number: 510-733-9100	4. Fax Number: 510-733-9600	Water Pump		
ontact Name: Kevin Singh	· · · · · · · · · · · · · · · · · · ·	3. Physical State at 70°F: Solid [
PA or State Transporter ID #:		Liquid Powder D Other		
esignated Landfill(s):		4. Free Liquids: NO YES % Liquids		
	Ik Liquids 🔲 Drums 🔲 Roll-Off	5. Color: Clear	6. pH Range: N/A	
Dump Truck 🖾 Tank Truck	_Vacuum Box L Bagged	7. Odor: 🖾 None 🗌 Mild 🗌 Signifi	cant Describe:	
stimated Volume: 500		8. Flash Point: N/A □ ºF □ ºC		
Tons Cubic Yards Dru	ums 🖾 Gallons 🔲 Other:	9. Reactive: NO VES with		
Shipping Frequency: p	er 🖾 One Time Project	10. State Required Information (if appli	cable): N/A	
	E. NON-HAZARDOUS	DETERMINATION	<u>.</u>	
ttached Document(s) (check all th	at apply): 🔲 Not Applicable 🔲 MSDS 🛛	Certified Analytical Report	Knowledge	
Process Knowledge, provide deta	ils: N/A			
	data derived from testing a representative sa of Sample: ☐ Composite ☐ Grab	mple in accordance with 40 CFR 261 and	d/or other applicable laws?	
	F. CERTIFICATIO	INFORMATION		
Initial Recertification, list prior approval number(s):				
	e composition of, or process generating this iysis may be required.)	waste stream that would alter the charact	eristics of the waste stream?	
ify this waste is not hazardous or dang brials, that all known and suspected ha is regulated by TSCA or any other reg tes may undergo inspection upon arriv	G. WASTE CERTIFIC ad herein is true and correct, and the material des erous as defined by the U.S. EPA, or the state or izards have been disclosed, and that the waste is ulatory authority. I certify that all samples used fo al at the designated facility and may be refused if n the composition of, or process generating this w	cribed is properly identified, classified, package province of origin. I certify this waste does not not a regulated hazardous waste by governme r this analysis are representative of the materia the delivered material does not conform to the	contain any regulated radioactive int or local authority, and does not contain ils described herein. I understand that all description herein. Notification will be	

TA. Sirah Manag ORIZED REPRESENTATIVE NAME/TITLE un sug ORIZED REPRESENTATIVE SIGNATURE

Economy Trucking Services, Inc.

JULY 17, 2015 DATE COMPLETED POTRERO HILLS LANDFILL, INC. P.O. Box 68 FAIRFIELD, CA 94533 (707) 432-4628



2628

ECONOMY TRUCKING SERVICE INC.

P.O. BOX 525 UNION CITY, CA 94587

DATE	TICKET	VEHICLE.	REFERENCE	DESCRIPTION	QUANTITY	AMOUNT
07/10/15	583626			Payment	1.00	-102.13
				Balance Forward		\$0.00
07/20/15	585972		PHLF15439	Solidification Disp	1.92	206.94
				Invoice Total		\$206.94
				Total Amount Due		\$206.94
				· · · · · · · · · · · · · · · · · · ·		
-						
-						

Payment due by August 15, 2015

A Payment may be made using a Master Card, Visa or Discover by calling the Potrero Hills Landfill at (707) 432-4627 A late fee will be charged if the total amount is not paid in full by the 15th of the month Thank you POTRERO HILLS LANDFILL, INC. Weighed at: POTRERO HILLS LANDFILL, INC. P.O. Box 68 FAIRFIELD, CA 94533

Deputy: Janee Quinonez Vehicle ID?: Reference: PHLF15439 Haul Cust #: HAYWARD DriverOn?: N Route: NO WASHOUT Trailer: 8F63572 Origin: HAYWARD DATE IN: 07/20/2015 TIME IN: 11:23:53 DATE OUT: 07/20/2015 TIME OUT: 12:08:51 Job: PHLF15439

INBOUND TICKET Number: 01-585972

SCALE 1 GROSS WT.	13540 LB
SCALE 3 TARE WT.	9700 LB
NET WEIGHT	3840 LB

Qty Description 1.92 Solidification Disp

WEIGHMASTER CERTIFICATE:

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code), administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

Х

(Deputy Signature)

This is to certify that this load does not contain any hazardous materials, medical waste or liquids of any type.

х_

(Driver Signature)