February 14, 2012



Paresh Khatri Hazardous Materials Specialist Alameda County Department of Environmental Health 1131 Harbor Bay Parkway Alameda, California 94502-6577

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4:47 pm, Feb 16, 2012

Alameda County Environmental Health

Dear Mr. Khatri:

Subject: Perjury Statement First Semi-Annual Groundwater Monitoring Report January 2012

Reference: Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606

PSC Industrial Outsourcing, LP has submitted this report on behalf of Earthgrains Baking Companies, Inc. I declare to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct.

Respectfully,

PSC INDUSTRIAL OUTSOURCING, LP

John R. Carrow, P.G. Senior Geologist

Earthgrains – Authorized Agent Gary McKinney Plant Manager – Oakland Bakery

February 14, 2012



Paresh Khatri Hazardous Materials Specialist Alameda County Department of Environmental Health 1131 Harbor Bay Parkway Alameda, California 94502-6577

Dear Mr. Khatri:

Subject:	First Semi-Annual Groundwater Monitoring Report for 2012 (January 2012)
Reference:	Earthgrains Baking Companies, Inc.
	955 Kennedy Street
	Oakland, California 94606
	RO #0002569

On behalf of Earthgrains Baking Companies, Inc. (Earthgrains), PSC Industrial Outsourcing, LP (PSC) is submitting the *First Semi-Annual Groundwater Monitoring Report for 2012* for the above-referenced project Site. This document presents the results of the first semi-annual groundwater-monitoring event performed in accordance with Water Resources Control Board Resolution 2009-0042a.

Site Information

Site Location

Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606 Alameda County Township 2 South, Range 3 West, Section 7 of the Mount Diablo Baseline and Meridian

Environmental Consultant

PSC Industrial Outsourcing, LP 210 West Sand Bank Road Columbia, Illinois 62236 John Carrow, P.G Senior Geologist (618) 281-1450 jcarrow@pscnow.com

Responsible Party

Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606 Gary McKinney Plant Manager (510) 436-5350 gary.mckinney@saralee.com

Regulatory Agency

Alameda County Department of Environmental Health (ACDEH) Local Oversight Program 1131 Harbor Bay Parkway Alameda, California 94502-6577 Paresh Khatri Hazardous Materials Specialist (510) 337-9335 paresh.khatri@acgov.org Mr. Paresh Khatri February 14, 2012 Page 2

Summary of Recent Project Activities

PSC prepared a *Tier 1 Risk Assessment and Request for No Further Action* in a report submitted to Alameda County Environmental Health (ACEH) on September 17, 2009. ACEH responded to the request in a May 20, 2010 letter to Earthgrains with a directive to perform source removal in the area of the former dispenser island. PSC prepared a *Feasibility Study/Corrective Action Plan (FS/CAP)* in response to the directive and submitted the report to ACEH on July 20, 2010. The FS/CAP proposed removal of soil and groundwater in the source area beneath the dispenser island area and the southern end of the former Truck Wash Building.

ACEH approved the FS/CAP on July 30, 2010. PSC commenced source removal activities in August 2010. PSC submitted the *Corrective Action Completion Report - Source Area Soil and Groundwater Removal Report* (CACR) to ACEH on April 19, 2010. PSC submitted the results of two groundwater-monitoring events performed in the second half of 2010 and the first half of 2011 in the CACR. The groundwater monitoring of the four remaining wells was completed in accordance with the approved FS/CAP. The data presented in the CACR has been used in the updated historical tables for this report. A summary of the Site background, project history, and Conceptual Site Model (CSM) is presented in Attachment A.

PSC received a comment letter on the CACR from ACEH and a directive that required post closure monitoring for the source removal activities. The directive specified that the groundwater monitoring wells should be screened in a permeable zone encountered in the excavation at 10 feet below ground surface (bgs). This would require placing additional wells in the area down gradient of the backfilled source area excavation, which is near the sidewalk and the property boundary. PSC appealed the ACEH directive on the basis that the site fits the State Water Resource Control Board's (SWRCB) *"Low Threat UST Closure Policy"*, dated July 14, 2011. A brief discussion of the rationale for this appeal is presented below.

Since the 2003 release at the dispenser island, PSC and their subcontractors have drilled 57 soil borings, collected 192 soil samples, 49 groundwater grab samples, and numerous groundwater well samples. Based on these investigations, the permeable zone encountered at 10 feet bgs is not laterally continuous across the Site. Geological cross-sections have been prepared based on these borings and submitted in previous reports including the FS/CAP. The cross-sections show the discontinuous nature of this permeable zone. Cross-Section C-C' shows sandy silts and clayey silts on the west down-gradient side of the source area. A thin layer of sand was encountered in MW-102, which is next to the source area excavation on the down-gradient side, at 9-10 feet below ground surface (bgs), but the soil was only moist. Groundwater or saturated soils were not encountered in the boring until approximately 28 feet bgs. The well was installed with screen placed from 18 to 28 feet bgs. These semi-confined conditions have been observed in other borings and wells installed at the Site. Historical water levels and residual TPH-d concentrations in MW-102 have been similar to those found in the cross or up-gradient well MW-104, which is screened from 10 to 25 feet bgs. It is PSC's opinion that residual TPH-d concentrations are at levels that are considered a low threat and

Mr. Paresh Khatri February 14, 2012 Page 3

groundwater is not migrating at a rate that would cause these low levels to become a threat in the future.

A conference call/meeting between ACEH, Earthgrains, and PSC took place on September 1, 2011. During that meeting, ACEH requested that two additional wells with screen intervals above the 10-foot bgs depth be installed north and south of MW-102 on the western or down gradient side of the source-area excavation. As previously mentioned, MW-102 was installed with the screen interval at 18 to 28 feet because there were no saturated permeable soils encountered until a depth of approximately 28 feet. PSC restated their opinion that they have provided an accurate estimate of residual hydrocarbons in soil and groundwater beneath the Site and that these residual hydrocarbons constitute a very low threat to human health and the environment. PSC and Earthgrains decided to continue with post closure monitoring of the four wells approved in FS/CAP, however the ACEH directive for additional wells would be appealed to the State Water Resource Control Board.

Current Groundwater Monitoring Event

Blaine Tech Services, Inc. (BTS) performed the first semi-annual groundwater-monitoring event on January 06, 2012. BTS's field documents are included as Attachment B. Samples were submitted to Kiff Analytical, LLC (Kiff) for laboratory analysis. Kiff's report is included as Attachment C. The findings of the current groundwater monitoring activities are summarized below.

Groundwater Monitoring Well Summary of Conditions – Wells MW-101 through MW-104 were inspected and no conditions requiring corrective actions were noted. The MW-104 well vault contained water that accumulated from surface water runoff. The water was removed prior to opening the well cap. Well construction details are presented in Table 1. Total depth measurements are presented in Table 2.

Groundwater Elevation – Wells MW-101 through MW-104 were measured and groundwater elevations were calculated to range from 4.95 to 2.88 feet above mean sea level (MSL). Free product was not observed in any of these wells during this or previous groundwater monitoring events. Groundwater levels in wells MW-101, MW-103, and MW-104 were 0.02 to 0.12 feet higher for this event compared to the previous monitoring event in July 2011. The groundwater levels for this event in these wells were 0.29 to 0.54 feet lower than the first semi-annual monitoring in February 2011. The water levels in MW-102 were 1.76 and 1.94 feet lower for this event compared to July 2011 and February 2011 respectively. Groundwater elevation measurements at the Site are presented on Table 2. Precipitation in the Oakland area for the July 2011 to January 2012 period (5.24 inches) was approximately 50 % compared with the same period the previous year (10.84 inches) and less than 50% of the normal precipitation (11.38 inches).

PSC has stated its opinion in previous documents that the water encountered at shallower depths in the source area is surface water perched in the gravel-filled excavations, utility conduits, and discontinuous shallow permeable intervals. This water recharges the underlying permeable layers of the shallow aquifer encountered at depths ranging from 19 to 28 feet. During the source area removal, water was observed seeping into the northern end of the

excavation. However, saturated soil was not encountered on the southern end near MW-102 where soil was excavated to 16 feet bgs.

The water level observed in MW-102 from the January 2012 event supports the CSM and the opinion of perched groundwater in discontinuous permeable layers at approximately 10 feet. It is PSC's opinion that the reduced precipitation from July 2011 through January 2012 resulted in a decreased hydraulic head from infiltrating surface water in the compacted backfilled excavation. This decreased head along with the absence of saturated permeable layers at shallow depths in MW-102 resulted in a lower water level only observed in MW-102. This effect was not observed in the other monitoring wells located up gradient or cross gradient from the source area excavation. The water level in MW-102 is considered anomalous compared to historic levels.

Groundwater Flow Direction and Gradient – Based on historic groundwater measurements, groundwater generally flows to the west. Groundwater flow for the January 6, 2012 event was toward the northwest. The approximate gradient of 0.04 foot-per-foot is an order of magnitude higher compared to historical gradients, which have been approximately 0.001 foot-per-foot. This gradient is also considered to be the result of the low precipitation and anomalous compared to historical groundwater monitoring events.

Contaminant Concentrations in Groundwater – All four wells sampled on January 6, 2012 contained total petroleum hydrocarbons as diesel (TPH-d) at concentrations ranging from 69 μ g/L to 250 μ g/L. MW-101, MW-103, and MW-104 had concentrations of TPH-d at 100, 60, and 79 μ g/L, respectively. Down-gradient well MW-102, which had the anomalously low water level, had a TPH-d concentration of 250 μ g/L. The duplicate sample collected from MW-102 had a concentration of 110 μ g/L. This is a relative percent difference of 78%, which is typically out of acceptable range for quality control precision. The environmental screening level (ESL) found in the San Francisco Bay Regional Water Quality Control Board document *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Revised May 2008, Table F-1b* is 210 μ g/L. Based on the high RPD between the primary and duplicate samples collected from MW-102 and the historical concentrations in this well ranging from 54 to 160 μ g/L, the result of 250 μ g/L is believed to be biased high.

Benzene, toluene, ethylbenzene, and xylenes (BTEX) were not detected in any of the samples collected for this or previous groundwater sampling events. Poly-nuclear aromatic hydrocarbons (PAH) were not detected in any of the samples collected during this or previous groundwater monitoring events. A summary of BTEX and TPH-d laboratory results are presented on Table 3. A summary of PAH laboratory results are presented on Table 4.

Well	MW-101	MW-102	MW-102 Dup	MW-103	MW-104
Salinity SU	0.96	0.94	0.94	0.54	0.59
TDS mg/L	900	783	790	450	430

PSC had additional samples analyzed for total dissolved solids and salinity to assess the general water quality in the shallow aquifer. The following table summarizes the results.

These levels are not unusual for groundwater in shallow aquifers surrounding the bay. Salinity and TDS at these levels are not indicative of salt water intrusion that can make an aquifer unusable. However, the levels do exceed the secondary drinking water standard of 500 mg/L established by the California Department of Health Services.

Planned Site Activities

PSC consulted with the SWRCB. In accordance with the SWRCB policy on petitions for case closure, PSC and Earthgrains submitted another request for closure on October 21, 2011 in lieu of a work plan requested in the directive from the ACEH staff. Neither Earthgrains nor PSC has received a response from ACEH. In January 2012, the California UST Fund conducted a 5-year review on the LUFT Case. They also concluded that the case should be recommended for closure. PSC will continue to collect post source-area removal groundwater samples from the four groundwater monitoring wells, MW-101 through MW-104 that surround the excavation until directed otherwise.

Earthgrains and PSC are waiting for a reply from the ACEH on the revised closure request and the recommendation from the California UST Fund. If you have any questions concerning this document, please contact me at (618) 792-2468.

Respectfully,

PSC INDUSTRIAL OUTSOURCING, LP ED GEN CARROW John R. Carrow, P.G * No. 5525 Sehior Geologist First Semi-Annual GW Monitoring Report -January 2012.doc Gary McKinney - Earthgrains Baring EoAp . Inc. cc: Ms. Karen Aldenhysen - Earthgrains Baking Companies, Inc. Ms. Kacey Fung – Bimbo Bakeries USA Mr. Christopher Wolfe – Bimbo Bakeries USA

Mr. Paresh Khatri February 14, 2012 Page 6

ATTACHMENTS:

- TABLE 1
 WELL CONSTRUCTION DATA
- TABLE 2-GROUNDWATER ELEVATION DATA
- TABLE 3
 CURRENT AND HISTORIC GROUNDWATER ANALYTICAL DATA BTEX AND TPH-D
- TABLE 4
 CURRENT AND HISTORIC GROUNDWATER ANALYTICAL DATA PAHs
- FIGURE 1 SITE LOCATION MAP
- FIGURE 2 SITE MAP
- FIGURE 3 SITE MAP SHOWING GROUNDWATER ELEVATION DATA
- FIGURE 4 SITE MAP SHOWING GROUNDWATER CONCENTRATION DATA TPH-D

ATTACHMENT A - SITE BACKGROUND AND UPDATED CONCEPTUAL SITE MODEL

ATTACHMENT B – BLAINE TECH SERVICES, INC. FIELD REPORT

ATTACHMENT C - KIFF ANALYTICAL, LLC LABORATORY REPORT

Table 1 Well Construction Data

Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606

Well ID	Date Installed	Casing Elevation ¹ (feet MSL)	Casing Material	Boring Depth (feet BGS)	Well Total Depth (feet BGS)	Well Total Depth (feet MSL)	Boring Diameter (inches)	Casing Diameter (inches)	Slot Size (inches)	Screened Interval (feet BGS)	Filter Pack Interval (feet BGS)	Filter Pack Sand
MW-101	1/19/09	13.90	PVC	28.10	28.05	-14.15	8	2	0.010	18-28	16-28	#2/12
MW-102	1/20/09	14.19	PVC	28.40	28.35	-14.16	8	2	0.010	18-28	16-28	#2/12
MW-103	1/19/09	13.75	PVC	25.00	24.92	-11.17	8	2	0.010	10-25	8-25	#2/12
MW-104	1/20/09	13.65	PVC	25.15	25.10	-11.45	8	2	0.010	10-25	8-25	#2/12
DW-1	1/20/09	14.05	PVC	14.65	14.60	-0.55	12	6	0.020	5-15	3-15	#2/12

Notes:

BGS = below-ground-surface

DW = de-watering well

MSL = mean sea level

PVC = polyvinyl chloride (Schedule 40)

1 = well casing elevations surveyed according to NAVD88 datum by PLS Surveys, Inc.on January 28, 2009

Table 2Active Groundwater Elevation Data

Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606

Well	Measurement	Well Casing (feet MSL) ¹	Water Depth (feet)	Groundwater (feet MSL)	Well Total Depth (TD) From TOC	TD (feet MSL)
	1/26/09	13.90	8.92	4.98	28.05	-14.15
	4/15/09	13.90	9.43	4.47	27.85	-13.95
	7/22/09	13.90	9.62	4.28	27.81	-13.91
	1/28/10	13.90	7.68	6.22	27.80	-13.90
MW-101	8/24/10	13.90	9.50	4.40	27.70	-13.80
	12/10/10	13.90	7.68	6.22	27.91	-14.01
	2/2/11	13.90	8.56	5.34	27.90	-14.00
	7/26/11	13.90	9.12	4.78	27.85	-13.95
	1/6/12	13.90	9.10	4.80	27.87	-13.97
	1/26/09	14.19	9.15	5.04	28.35	-14.16
	4/15/09	14.19	9.55	4.64	28.21	-14.02
	7/22/09	14.19	10.02	4.17	28.19	-14.00
	1/28/10	14.19	9.70	4.49	28.15	-13.96
MW-102	8/24/10	14.19	9.75	4.44	28.15	-13.96
102	12/10/10	14.19	8.16	6.03	28.27	-14.08
	2/2/11	14.19	9.37	4.82	28.28	-14.09
	7/26/11	14.19	9.55	4.64	28.14	-13.95
	1/6/12	14.19	11.31	2.88	28.22	-14.03

Table 2Active Groundwater Elevation Data

Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606

Well	Measurement	Well Casing (feet MSL) ¹	Water Depth (feet)	Groundwater (feet MSL)	Well Total Depth (TD) From TOC	TD (feet MSL)
	1/26/09	13.75	8.69	5.06	24.92	-11.17
	4/15/09	13.75	8.91	4.84	24.74	-10.99
	7/22/09	13.75	9.18	4.57	24.68	-10.93
	1/28/10	13.75	7.75	6.00	24.65	-10.90
MW-103	8/24/10	13.75	9.03	4.72	24.20	-10.45
	12/10/10	13.75	7.67	6.08	24.80	-11.05
	2/2/11	13.75	8.51	5.24	24.77	-11.02
	7/26/11	13.75	8.84	4.91	24.70	-10.95
	1/6/12	13.75	8.80	4.95	24.69	-10.94
	1/26/09	13.65	8.65	5.00	25.00	-11.35
	4/15/09	13.65	8.87	4.78	24.90	-11.25
	7/22/09	13.65	9.27	4.38	24.91	-11.26
	1/28/10	13.65	8.02	5.63	24.90	-11.25
MW-104	8/24/10	13.65	9.00	4.65	24.69	-11.04
	12/10/10	13.65	7.60	6.05	24.40	-10.75
	2/2/11	13.65	8.38	5.27	24.94	-11.29
	7/26/11	13.65	8.84	4.81	24.86	-11.21
	1/6/12	13.65	8.72	4.93	24.69	-11.04
	1/26/09	14.05	9.10	4.95	14.60	-0.55
	4/15/09	14.05	9.23	4.82	14.41	-0.36
DW-1	7/22/09	14.05	9.50	4.55	14.41	-0.36
	1/28/10	14.05	7.84	6.21	NM	NM
	8/24/10	14.05	9.00	5.05	14.25	-0.20
		Well de	stroyed during sou	urce area removal		

Notes:

DW = de-watering well

MSL = mean sea level

TOC = top of casing

1 = well casing elevations surveyed according to NAVD88 datum by PLS Surveys, Inc.on January 28, 2009

Table 3 Groundwater Analytical Data BTEX and Total Petroleum Hydrocarbons as Diesel Fuel Earthgrains Baking Companies, Inc. 955 Kennedy Street Oakland, California 94606

	Sample Parameter Concentration (µg/L)						
Well ID	Collection	Benzene	TPH-d				
	Date	ESL = 46	ESL = 130	ESL = 43	ESL = 100	ESL = 210	
	1/26/09	<0.50	<0.50	<0.50	<0.50	<50	
	4/15/09	<0.50	<0.50	<0.50	<0.50	<50	
	7/22/09	<0.50	<0.50	<0.50	<0.50	<50	
	1/28/10	<0.50	<0.50	<0.50	<0.50	64	
MW-101	8/24/10	<0.50	<0.50	<0.50	<0.50	110	
	12/10/10	<0.50	<0.50	<0.50	<0.50	86	
	2/2/11	<0.50	<0.50	<0.50	<0.50	61	
	7/26/11	<0.50	<0.50	<0.50	<0.50	60	
	1/6/12	<0.50	<0.50	<0.50	<0.50	100	
	1/26/09	<0.50	<0.50	<0.50	<0.50	160	
	4/15/09	<0.50	<0.50	<0.50	<0.50	140	
	7/22/09	<0.50	<0.50	<0.50	<0.50	120	
	1/28/10	<0.50	<0.50	<0.50	<0.50	54	
MW-102	8/24/10	<0.50	< 0.50	< 0.50	<0.50	89	
	12/10/10	<0.50	< 0.50	<0.50	< 0.50	160	
	2/2/11	<0.50	<0.50	<0.50	<0.50	110	
	7/26/11	<0.50	< 0.50	<0.50	< 0.50	97	
	1/6/12	<0.50	< 0.50	<0.50	<0.50	250	
	1/26/09	<0.50	< 0.50	<0.50	<0.50	80	
	4/15/09	<0.50	< 0.50	< 0.50	< 0.50	<50	
	7/22/09 1/28/10	<0.50 <0.50	<0.50 <0.50	<0.50 <0.50	<0.50 <0.50	<50 63	
MW-103	8/24/10	<0.50	<0.50	<0.50	<0.50	<50	
	12/10/10	<0.50	<0.50	<0.50	<0.50	<50	
	2/2/11	<0.50	<0.50	<0.50	<0.50	< <u>50</u>	
	7/26/11	<0.50	<0.50	<0.50	<0.50	51	
	1/6/12	<0.50	<0.50	<0.50	<0.50	60	
	1/26/09	<0.50	<0.50	<0.50	<0.50	100	
	4/15/09	<0.50	<0.50	<0.50	<0.50	79	
	7/22/09	<0.50	<0.50	<0.50	<0.50	97	
	1/28/10	<0.50	<0.50	<0.50	<0.50	68	
MW-104	8/24/10	<0.50	<0.50	<0.50	<0.50	100	
	12/10/10	<0.50	<0.50	<0.50	<0.50	84	
	2/2/11	<0.50	<0.50	<0.50	<0.50	92	
	7/26/11	<0.50	<0.50	<0.50	<0.50	100	
	1/6/12	<0.50	<0.50	<0.50	<0.50	79	
DW-1	1/26/09	<0.50	<0.50	<0.50	<0.50	1,200	
	4/15/09	<0.50	<0.50	<0.50	<0.50	830	
	7/22/09	<0.50	<0.50	<0.50	<0.50	1,000	
	1/28/10	NS	NS	NS	NS	NS	
	8/24/10	0.83	1.4	<0.50	1.0	970	
	ļ	Wel		source area rem	oval		
	1/26/2009*	<0.50	<0.50	<0.50	<0.50	1,200	
	4/15/2009*	<0.50	<0.50	<0.50	<0.50	960	
	7/22/2009*	<0.50	<0.50	<0.50	<0.50	1,100	
	1/28/2010**	<0.50	<0.50	<0.50	<0.50	<50	
DUP	8/24/2010**	<0.50	<0.50	<0.50	<0.50	140	
	12/10/2010**	<0.50	<0.50	<0.50	<0.50	200	
	2/2/2011**	<0.50	<0.50	<0.50	<0.50	120	
	7/26/2011**	<0.50	< 0.50	<0.50	< 0.50	110	
	1/6/2012**	<0.50	<0.50	<0.50	<0.50	110	

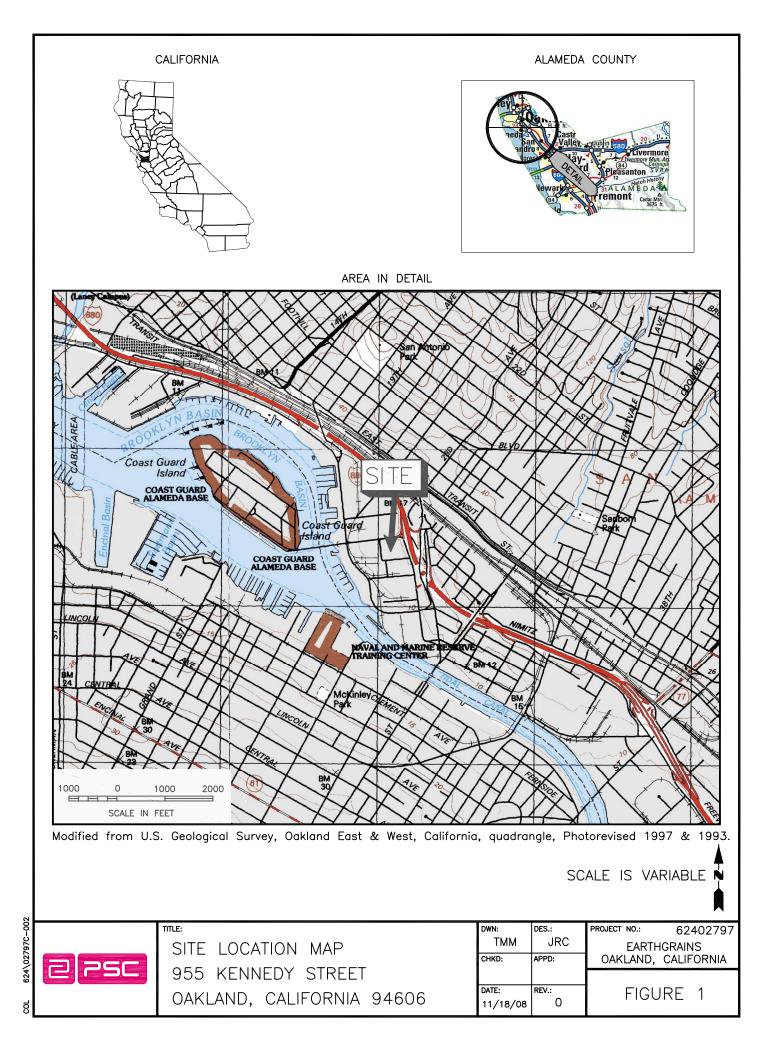
Notes: *DUP = duplicate sample for DW-1 **DUP = duplicate sample for MW-102 DW = de-watering well ESL = environmental screening level according to ESL Document Table F-1b TPH-d = total petroleum hydrocarbons quantified as diesel µg/L = micrograms-per-liter

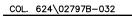
Table 4Groundwater Analytical DataPoly-Nuclear Aromatic HydrocarbonsEarthgrains Baking Companies, Inc.955 Kennedy StreetOakland, California 94606

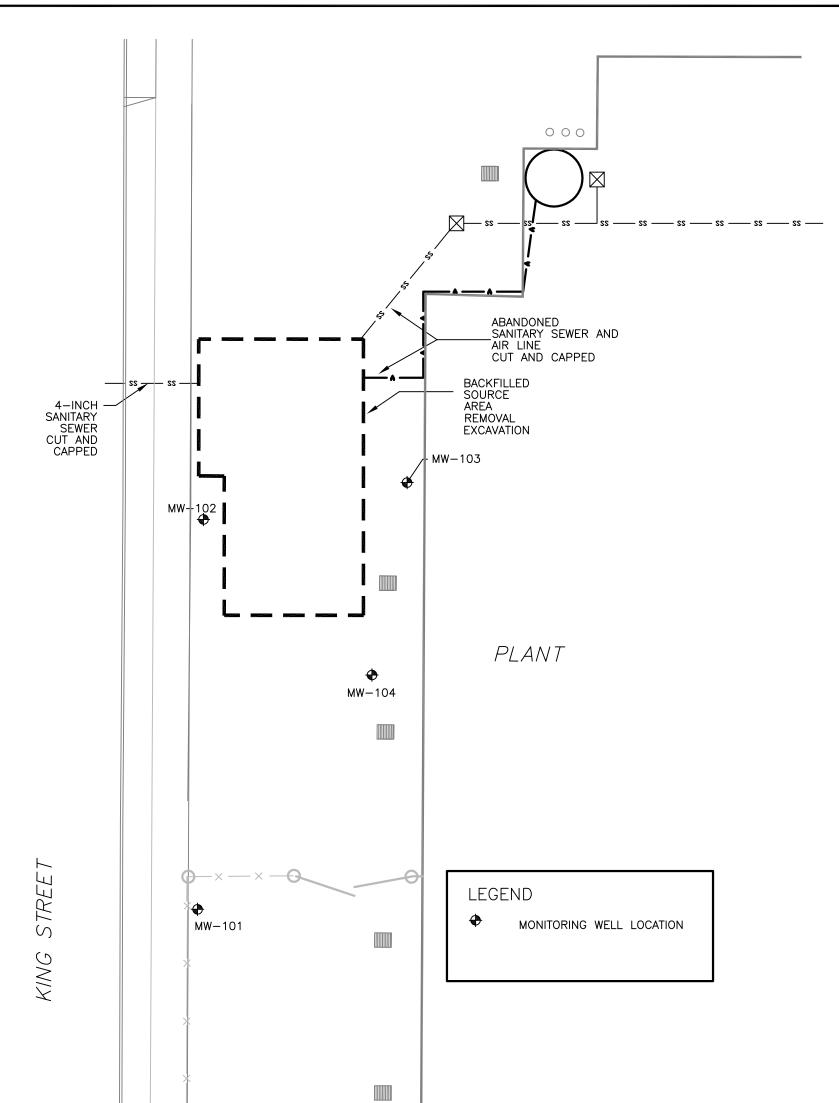
		Parameter Concentration (µg/L)								
Well ID	Sample Collection Date	Naphthalene ESL = 24	Acenaphthylene ESL = 30	Acenaphthene ESL = 23	Fluorene ESL = 39	Phenanthrene ESL = 4.6	Anthracene ESL = 0.73	Fluoranthene ESL = 8.0	Pyrene ESL = 2.0	
	7/22/09	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/28/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	8/24/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
MW-101	12/10/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	2/2/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/26/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/6/12	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/22/09	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/28/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	8/24/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
MW-102	12/10/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	2/2/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/26/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/6/12	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/22/09	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/28/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	8/24/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
MW-103	12/10/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	2/2/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/26/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/6/12	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/22/09	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/28/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	8/24/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
MW-104	12/10/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	2/2/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/26/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/6/12	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
DW-1	7/22/09	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/28/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	8/24/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	12/10/10	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	2/2/11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	<i>L</i> / <i>L</i> /11	\$1.0	\$1.0		d during source a		\$1.0	\$1.0	\$1.0	
	7/22/2009**	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/28/2010**	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	8/24/2010**	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
DUP	12/10/2010**	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
-	2/2/2011**	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	7/26/2011**	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
	1/6/12	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	

					Parameter Conce	entration (µg/L)			
Well ID	Sample Collection Date	Benzo (a) Anthracene ESL = 0.027	Chrysene ESL = 0.35	Benzo (b) Fluoranthene ESL = 0.029	Benzo (k) Fluoranthene ESL = 0.40	Benzo (a) Pyrene ESL = 0.014	Dibenz (a,h) Anthracene ESL = 0.25	Benzo (g,h,i) Perylene ESL = 0.10	c,d) Pyrene ESL = 0.048
	7/22/09	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
MW-101	12/10/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/2/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/6/12	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/22/09	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
MW-102	12/10/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/2/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/6/12	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/22/09	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
MW-103	12/10/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/2/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/6/12	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/22/09	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
MW-104	12/10/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/2/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/6/12	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DW-1	7/22/09	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/10	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/2/11	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
				Well destroye	d during source a	rea removal		1	1
	7/22/2009 **	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/2010 **	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/2010 **	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP	8/24/2010**	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/2010**	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/2011**	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/6/12	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0

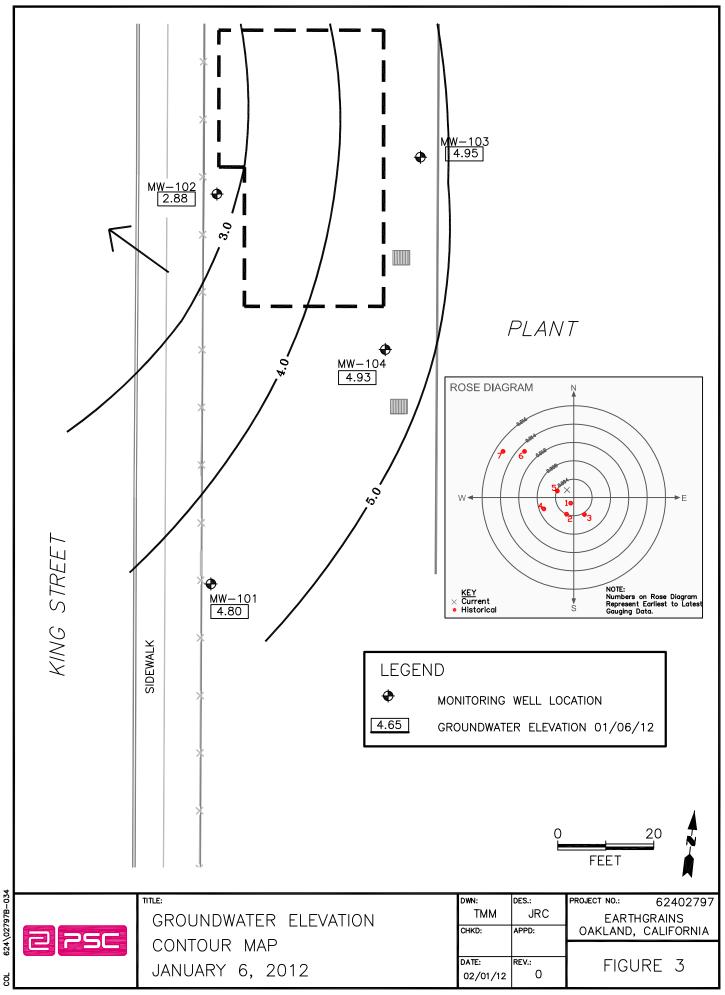
Notes: *DUP = duplicate sample for DW-1 **DUP = duplicate sample for MW-102 DW = de-watering well ESL = environmental screening level according to ESL Document Table F-1b µg/L = micrograms-per-liter



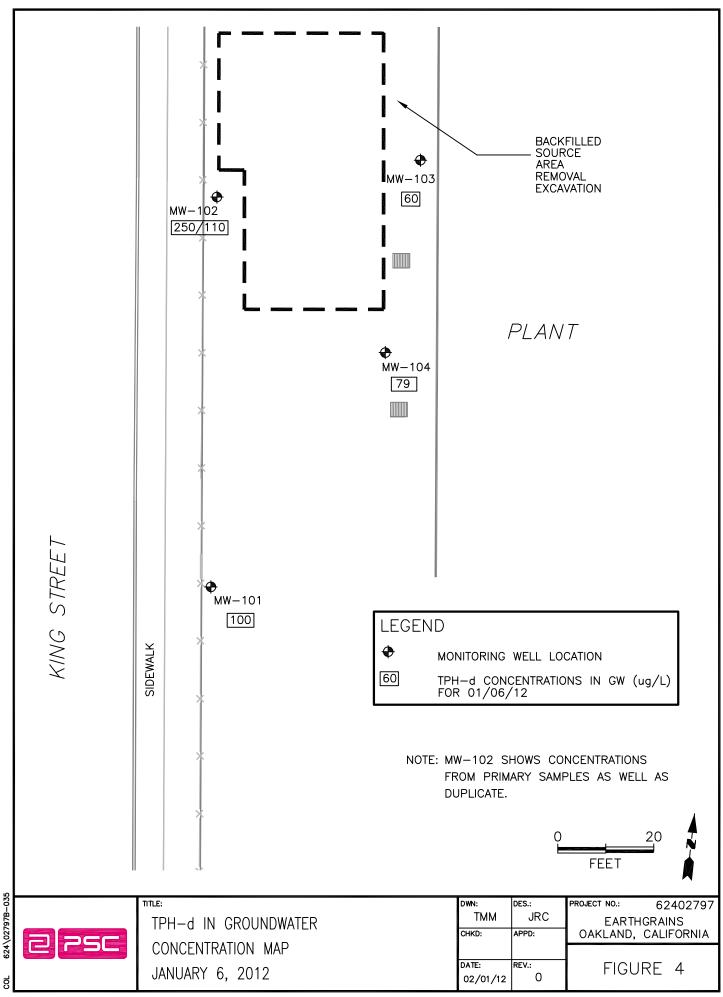




			0 20 FEET
22	SITE MAP POST SOURCE REMOVAL GROUNDWATER MONITORING WELL LOCATION	DWN: DES.: TMM JRC CHKD: APPD: DATE: REV.: 8/25/11 0	PROJECT NO.: 62402797 EARTHGRAINS OAKLAND, CALIFORNIA FIGURE 2



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ATTACHMENT A

SITE BACKGROUND AND UPDATED CONCEPTUAL SITE MODEL

A1 INTRODUCTION AND SITE BACKGROUND

The Site history, geology, hydrogeology, soil and groundwater quality are presented in the following Section A-1. The Conceptual Site Model (CSM) is presented as Section A-2 of this Appendix.

A1.1 Description of Site and Vicinity

The Site occupies approximately five acres of commercial property in Oakland, California. Earthgrains owns and operates a 105,000 square-foot plant consisting of a bakery, product distribution center, and thrift store at the Site. The entire Site is covered with building structures, asphalt, or concrete pavement. An asphalt-paved parking area and driveway border the eastern and western sides of the Site and truck-loading docks are located in the northwestern side of the plant. A stand-alone truck wash building was located west of the plant and a former truck maintenance garage was located in the northwestern corner of the Site. The truck wash building was removed during source area removal operations. The Site is bounded by Dennison Street to the north, Frederick Street to the south, Kennedy Street to the east, and King Street to the west. Surrounding properties to the north, south, and west of the Site are mainly industrial and commercial businesses. Interstate 880 is located east of Kennedy Street. The Site Location Map is presented as **Figure 1** within the main document's Figure's section.

The Site is located within an incorporated area of the City of Oakland and the municipal water provider is the East Bay Municipal Utility District (EBMUD). Treated surface water from the Mokelumne River watershed and rainfall from the East Bay watershed is combined to supply water to EBMUD customers. The underground utilities near the former UST system and the source of the release have been changed since the source removal. The sanitary sewer lateral that exited the building on the west side and connected to the sanitary sewer beneath King Street was removed with the truck wash building. The water, air, and electric underground utilities have been cut, removed, and capped. The sanitary sewer was capped near the western property boundary near a natural gas pipeline that travels parallel to King Street.

A1.2 Site History and Current Conditions

The Earthgrains facility (formerly Kilpatrick's Bakeries, Inc.) was constructed in the late 1960s and has operated as a bakery and product distribution center. Earthgrains installed and operated eight UST systems at the Site from 1967 to 2005 for fleet operations and back-up oven fuel storage. Subsurface investigations and groundwater monitoring were performed at the Site from 1989 through 1996 for a previous unauthorized release from a diesel UST system. Earthgrains received environmental case closure in 1996 following submittal of a Tier 1 Risk Assessment report to the Alameda County Department of Environmental Health (ACEH). Residual petroleum hydrocarbons were left in soil at the Site when closure was granted.

Earthgrains reported an additional unauthorized diesel UST system release at the Site in 2003 following the discovery of petroleum hydrocarbons during product piping modifications at a diesel pump island. Since the Tier 1 Risk Assessment report indicated that residual petroleum hydrocarbons remained in soil near the 2003 diesel UST system release area, the exact source of the petroleum hydrocarbons was undetermined. Investigation and corrective action since 2005 was conducted under RO#0002569.

A1.3 UST System Closures and Corrective Action

Earthgrains operated eight UST systems at the Site from 1967 to 2005. The locations of the UST systems are shown on Figure 2 of the FS/CAP. Earthgrains performed the following UST activities:

- Four 10,000-gallon diesel UST systems were installed in a shared tank excavation in 1977, south of the truck wash building as a back-up fuel supply system for the ovens in the plant. The four diesel UST systems were removed for permanent closure on October 11, 1989. During the UST closure activities, 384 tons of diesel-impacted soil were excavated and removed for off-site disposal and the former UST excavation was backfilled with clean, imported pea gravel.
- One 10,000-gallon gasoline, one 10,000-gallon diesel, and one 350-gallon waste oil UST system was installed south of the former truck maintenance garage during 1967. The gasoline and diesel tanks shared a common excavation and were removed for permanent closure on December 12, 1990. The waste oil UST system was removed for permanent closure on January 28, 1991 and approximately 25 cubic-yards of petroleum-impacted material was excavated and removed for off-site disposal. The UST excavations were then backfilled with clean, imported granular material.
- One 10,000-gallon diesel UST system was installed in January 1991 to replace the former diesel UST system removed southeast of the truck maintenance garage in December 1990. Earthgrains removed the original pump island on the 10,000-gallon diesel UST system and installed a new diesel dispensing system south of the truck wash building in 1995.
- Earthgrains upgraded the product dispensing system in April 2003 in order to comply with new under-dispenser containment requirements. Additional diesel fuel-contaminated soil was discovered at that time and the diesel UST system was removed for permanent closure on March 9, 2005. Based upon the UST closure assessment data, Earthgrains submitted an unauthorized UST release (leak) report for the Site to the Oakland Fire Department on April 15, 2005. This was the last UST system operated by Earthgrains at the Site.

A1.4 Historic Environmental Investigations

A historical unauthorized release of diesel fuel was reported in 1989 following UST system closure. Historic subsurface investigation and corrective action were performed from 1989 through 1996 for this release. These historical environmental investigations assessed soil and groundwater quality. Soil and groundwater samples were analyzed for total petroleum hydrocarbons (TPH) as gasoline (g), diesel (d), and motor oil (mo); benzene, toluene, ethylbenzene, and total xylenes (BTEX); volatile organic compounds (VOC); and poly-cyclic aromatic hydrocarbons (PAHs). Historical soil sample locations, soil analytical data, and groundwater data are presented in the FS/CAP. The historic environmental investigation activities at the Site are summarized below:

1992 Site Investigation

PSC, formerly Burlington Environmental, Inc., performed a Site investigation in August 1992 to assess the lateral and vertical extent of petroleum hydrocarbons in soil and groundwater from the 1989 diesel UST system release. PSC installed five groundwater-monitoring wells (MW-1 through MW-5) at the Site and performed quarterly groundwater monitoring from August 1992 to December 1994.

1995 Tier 1 Risk Assessment

Groundwater samples collected and analyzed from the quarterly monitoring events performed between 1992 and 1994 detected concentrations of chlorinated and non-chlorinated solvents. PSC submitted a Tier 1 Risk Assessment report for the Site in July 1995 prepared in accordance with the American Society of Testing and Materials (ASTM) Risk Based Corrective Action procedures and Emergency Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites ES 38-94. The report presented evidence that solvent concentrations in groundwater found in the investigation were derived from an off-site source. The ACEH agreed with the assessment report findings and closed the environmental case in March 1996. PSC abandoned the five groundwater-monitoring wells at the Site in March 1996 and Earthgrains received environmental case closure on April 17, 1996.

2003 Release

Earthgrains reported an additional unauthorized diesel UST system release at the Site in 2003 following the discovery of petroleum hydrocarbons during product piping modifications at a diesel pump island. Since the 1995 Tier 1 Risk Assessment report indicated that residual petroleum hydrocarbons remained in soil near the 2003 diesel UST system release area, the exact source of the petroleum hydrocarbons was undetermined.

Detailed investigations performed in 2006 and 2007 indicate that subsurface soils at the Site consist of silt and clay to a depth of approximately 20 feet bgs, where a sand and gravel layer is typically first encountered. Groundwater in this permeable layer is under semi-confined conditions. The report stated that perched water is encountered in the gravel backfill material of the former shared diesel UST excavation and shallow silty-sand layers above 20 feet bgs at the Site.

2006 Soil and Groundwater Quality Investigation

On behalf of PSC, ETIC Engineering, Inc. (ETIC) performed a soil and groundwater quality investigation at the Site in September 2006 to further evaluate residual petroleum hydrocarbons remaining in the subsurface following the unauthorized diesel UST system release in April 2005. ETIC drilled 40 borings and submitted 131 soil and 38 groundwater grab samples for laboratory analyses.

Diesel was the primary chemical detected in soil and groundwater grab samples collected and analyzed during this Site investigation. The highest concentrations of TPH-d detected in soil were from samples collected in the vicinity of the former diesel pump island located south of the truck wash building and along the southern end of the former diesel product piping trench. The highest concentrations of TPH-d detected in soil samples were collected at depths of less than 16 feet bgs. Concentrations of TPH-d were also detected in soil samples collected south of the former truck maintenance garage in the northwest corner of the Site.

2007 Remedial Investigation

ETIC performed a remedial investigation at the Site in March 2007 to assess the lateral and vertical extent of subsurface diesel contamination in preparation for remediation. ETIC drilled an additional 12 soil borings and collected 61 soil and 11 groundwater grab samples for laboratory analyses. The highest TPH-d concentrations detected in soil samples were collected at depths from 8.5 to 15.5 feet bgs. Concentrations of BTEX were not detected in any of the soil samples collected during this remedial investigation.

2009 Groundwater Investigation

PSC submitted a *Groundwater-Monitoring Well Installation Plan* dated November 18, 2008 and a *Groundwater-Monitoring Well Installation Plan Addendum* dated January 9, 2009 to the ACEH. The purpose for performing a groundwater investigation at the Site was to provide additional soil and groundwater data for a feasibility study/remedial evaluation (FS/RE) to evaluate source removal by excavation. Information from the 2009 groundwater investigation is presented in Section 2 of this report. The well installation plan and addendum were approved by the ACEH in January 2009.

Soils encountered in the borings consisted of a few feet of fill material overlying silty and sandy clay. Sand, gravelly sand, and clayey gravel were encountered in the soil borings for MW-102, MW-103, and MW-104. Saturated soil was typically encountered at approximately 20 feet bgs. Layers of saturated soil were encountered at shallower depths in MW-103 and MW-104. Selected soil samples were submitted for laboratory analysis of TPH-d, and BTEX.

Four two-inch diameter groundwater-monitoring wells (MW-101 through MW-104) and one sixinch diameter dewatering well (DW-1) were installed at the Site. MW-103 was installed northeast of the former diesel pump island in a hydraulically up-gradient location and the remaining three monitoring wells were installed west, southwest, and southeast of the former diesel pump island. DW-1 was installed in granular backfill material at the northern end of the former shared excavation for the back-up oven fuel tanks. This six-inch diameter well was constructed with Schedule 40 PVC casing and 10 feet of 0.020-inch slotted PVC well screen to a total depth of 15 feet bgs.

The analytical reports for soil samples indicate that TPH-d concentrations exceeded the Environmental Screening Levels (ESL) for leaching to groundwater in soil samples from MW-104 (8.5-10) and DW-1 (8.5-10) and the groundwater ESL in the groundwater sample collected from DW-1. ACEH indicated that soil concentrations in well DW-1 might be indicative of light non-aqueous liquids (LNAPLs). However, PSC has routinely checked all monitoring wells including DW-1 and have found no LNAPLs or free phase petroleum product.

Groundwater sample results from January indicated concentrations of TPH-d in MW-102, MW-103, and MW-104. These concentrations did not exceed the groundwater ESL of 210 μ g/L. The sample from DW-1 had a TPH-d concentration of 1,200 μ g/L. Laboratory analytical data indicate that BTEX concentrations were not detected in any of the soil or groundwater samples collected. Results of soil bulk density ranged from 1.5 to 1.9 g/cm³, which is typical of a silty clay. Total organic carbon numbers ranged from 1,050 to 2,900 mg/kg.

PSC performed a modified pump test on DW-1 to determine the volume of water and the rate of removal required to dewater the area around the former diesel pump island. Gregg Drilling and Engineering (Gregg) installed a submersible pump in DW-1 and pumped the dewatering well at the highest sustainable flow rate. Gregg was only able to maintain a pumping rate of less than one gallon-per-minute in the dewatering well for a period of seven hours. PSC measured a water-level drawdown of approximately two feet in DW-1 during the seven-hour pump test event.

In order to assess the hydraulic connection between perched water in the former shared diesel UST excavation with the permeable zone screened in the monitoring wells, PSC placed pressure transducers near the bottom of each monitoring well. The pressure transducer measured the change in water pressure and calculated the water column height during the test. The transducers were connected to a Hermit 3000 Data Logger and the electronic components interfaced with a laptop computer using Win-Situ software. PSC measured a water-level drawdown of approximately one foot in MW-102 during the test. MW-102 is located about 15 feet northwest

of DW-1. PSC observed minimal changes to the water levels in MW-101, MW-103, and MW-104 during the pump test, but these fluctuations could be attributed to changes in barometric pressure. This pump test indicated that there is a limited hydraulic connection between the groundwater in the former excavation and the groundwater encountered in the monitoring wells.

After completion of the well development and pump test, PSC conducted slug testing on the monitoring wells to assess hydraulic conductivity of the shallow aquifer. Pressure transducers were placed near the bottom in each well and connected to the Hermit 3000 data logger. Rising and falling water level data were recorded on a laptop computer. A 1-inch diameter by 3-foot long solid slug was lowered into the water column. The rise and fall of the water level were measured until it had stabilized. The slug was removed and the fall and rise of the rebounding water table were measured.

Data from the slug tests were analyzed using AQTESOLVTM, commercially available solution software for hydraulic conductivity and pump tests. Water level and time data are plotted using the software. A Bouwer-Rice solution for confined aquifers was used to match a tangent line to the slope of the data. The results of the solution are presented as hydraulic conductivity in cm/sec. Not all of the slug test data were usable. Five results of slug in/slug out data provided useful curves that could be matched to the selected solution. An average hydraulic conductivity of 5.2×10^{-4} cm/sec was estimated from the slug test.

A1.5 Historic Groundwater Monitoring

Groundwater monitoring was performed at the Site from August 1992 to December 1994 and groundwater samples were collected for laboratory analyses from historic wells MW-1 through MW-5. Concentrations of TPH-g and TPH-mo were detected in groundwater samples collected from MW-2 and MW-4. Chlorinated and non-chlorinated solvent compounds were also detected in groundwater samples from MW-4, but a risk assessment determined that the concentrations were derived from an off-site source. Earthgrains received environmental case closure from the ACEH in April 1996. These wells have been closed and abandoned.

No free-phase petroleum hydrocarbons were detected in the wells during the historic groundwater-monitoring events at the Site. Water level measurements obtained from the monitoring events indicated that groundwater flowed beneath the Site in a west-southwest direction at a hydraulic gradient of approximately 0.005 to 0.01 foot-per-linear foot (ft/ft).

PSC subcontracted Blaine Tech Services, Inc. (BTS) to perform April and July 2009 and January 2010 quarterly groundwater-monitoring events at the Site. BTS collected groundwater samples from the five active wells (MW-101 through MW-104 and DW-1) on April 15 and July 22, 2009 and January 28, 2010. Samples were submitted to Kiff for analyses of TPH-d, BTEX, and PAHs. The analytical data for the historical groundwater monitoring events are summarized in the FS/CAP.

Kiff analytical data indicates that TPH-d concentrations exceeded the ESL for groundwater in samples collected from DW-1. However, this well is screened in groundwater in the former UST excavation. TPH-d concentrations in well MW-102 ranged from 160 to 120 μ g/L from January to July 2009. TPH-d concentrations well MW-104 ranged from 100 to 97 μ g/L from January to July 2009. TPH-d concentrations were 80 μ g/L in well MW-103 after the installation, but were not detected in the last two sampling events. PAHs and BTEX concentrations were not detected in the July sampling event.

A1.6 Tier 1 Risk Assessment

PSC conducted a Tier 1 Risk Assessment in accordance with "Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Interim Final, November 2007, (Revised May 2008)" (SFBRWQCB ESL Guidance Document). PSC submitted their "Tier 1 Risk Assessment and No Further Action Request report, on September 17, 2009. As the title indicates, based on the minimal risk to human health, safety and the environment, PSC requested that ACEH require no further action. ACEH disagreed that the site was ready for "no further action" based on elevated concentrations of TPH-d in shallow soil and groundwater in the source area. The following is a summary list of the ACEH comments and required actions presented in the letter.

- Based on the analytical data and reported groundwater flow direction, the extent of dissolved phase hydrocarbons in the deeper water-bearing unit appears adequately characterized at this time.
- The shallow water-bearing unit, referred by PSC as "perched water", appears significantly impacted with TPH-d and was omitted from any risk evaluation. Concentrations
- Concentrations of TPH-d have been detected as high as 8,300 mg/kg in soil and as high as 3,500,000 μg/L in groundwater.
- Although naphthalene was not detected in the most recent groundwater sample event, it is not clear whether naphthalene analysis was conducted during previous site characterizations since naphthalene analysis is not included in the historical analytical data tables.
- Based on the analytical data, significant residual source area appears to exist in shallow soil and groundwater and corrective action is warranted.

ACEH required the submittal of a FS/CAP prepared in accordance with Title 23, California Code of Regulations, Section 2725. PSC prepared and submitted a FS/CAP on July 16, 2010. Because of the nature of diesel contamination and subsurface conditions, the report compared only 2 remedial alternatives. PSC concluded that dewatering and excavation of soil in the source area

was the most effective remedy. The corrective action plan included de-watering the shallow saturated zone using well DW-1.

A2 SUMMARY OF REVISED CONCEPTUAL SITE MODEL

PSC has presented a conceptual model of the Site in previous documents. Based on a discussion regarding the update of the California LUFT Manual, Version 2, October 4, 2010, PSC has revised the CSM. The objective of the CSM is to provide a current opinion on the following:

- an understanding of the origin, nature, and lateral and vertical extent of contamination;
- potential contaminant fate and transport processes and pathways;
- potential human and environmental receptors that may be impacted by contamination associated with the Site;
- additional data needed to draw reasonable conclusions regarding the source(s), pathways, and receptors; and
- an evaluation of the risk to human health, safety and the environment posed by the LUFT Site.

The components of an effective CSM include maps, cross-sections, tables, charts, and boring logs. These components are included in this and previous reports and work plans prepared for the Site. The following sections of this report are a summary of the CSM as presented in previous reports with additional information from the completed corrective action supporting or clarifying the opinions presented in the previous CSM.

A2.1 Land Use and Environmental Setting

The Site has been a commercial/industrial property since the late 1960s. The current use of the Site is a bakery and bakery product distribution center. The Site is covered by either pavement or structures. Based on its close proximity to Interstate 880 and San Francisco Bay, the Site will likely remain a commercial/industrial property for the near future.

Surface water or storm water from the western side of the Site flows to a storm sewer located about 20-feet west of and parallel to the bakery building. Water in this storm sewer flows north where it empties into a concrete storm-water sewer beneath and parallel to Dennison Street. An additional storm drain is located approximately 25 feet west of the Site beneath King Street. The storm-water sewer along King Street flows north and intersects a second storm-water sewer that travels beneath and parallel to Dennison Street, approximately 60 feet northwest of the property. This storm water sewer flows west to Embarcadero Street and Brooklyn Basin. Based on the lateral and vertical extent of contamination in soil and groundwater, impact to storm water or surface waters from the release on Site has not occurred.

A2.2 Local Geology and Hydrogeology

The Site is located in the East Bay Plain Sub-basin of the Santa Clara Valley Groundwater Basin. The East Bay Plain Sub-basin aquifer system consists of unconsolidated deposits from the Quaternary age. These deposits include the early Pleistocene Santa Clara Formation, the late Pleistocene Alameda Formation, the early Holocene Temescal Formation, and artificial fill. The cumulative thickness of the unconsolidated deposits is approximately 1,000 feet.

Historical soil boring logs indicate that the predominant soil types beneath the Site consist primarily of clay and silty clay. During source removal corrective action in October and November 2010, soil consisted predominately of silty clays. A one to two foot thick layer of sand and gravel was encountered at depths ranging from 11 to 14 feet bgs. Silty clay was encountered beneath this sand layer.

Historical drilling activities performed across the Site indicated that groundwater was encountered within a sand and gravel layer located at depths of 18 to 26 feet bgs. Groundwater appeared to be in a semi-confined condition and groundwater levels stabilized at approximately 9 feet bgs. Previously, PSC believed that a large area of perched water, near the former shared diesel UST excavation south of the former Truck Wash Building was recharging the shallow permeable zones at 18 feet bgs. Sand and gravel encountered at 11 to 14 feet bgs in the source removal excavation appeared to be native soil. This soil was saturated. This observation indicates that the first occurrence of groundwater beneath the Site is in this sandy material encountered as shallow as 9 feet bgs. Based on boring logs across the Site the permeable sands do not appear to be laterally continuous across the Site.

Groundwater flow direction at the Site is generally toward the west-southwest with a hydraulic gradient ranging from approximately 0.005 to 0.01 ft/ft. An average hydraulic conductivity of 5.02×10^{-4} cm/sec was obtained from the results of slug testing. Using this hydraulic conductivity, a hydraulic gradient of 0.005 ft/ft and a porosity of 35, the linear velocity of groundwater is estimated to be 7.6 ft/year. This estimate is conservative and the distance traveled by a particle of groundwater should be much less than 7.6 feet a year. The distance a contaminated groundwater plume will travel in a year requires additional parameters for the contaminant such as solubility and natural attenuation parameters for the soil. Only TPH-d, which is a mixture and has no specific chemical properties like solubility, has been detected in groundwater. Therefore, fate and transport modeling has not been completed.

A2.3 Sources of Contamination

The primary source area for the current unauthorized diesel release at the Site is the former diesel pump island located south of the Truck Wash Building. An additional source of contamination is the former diesel fuel UST located adjacent to the former Truck Repair Building which was located north of the Truck Wash Building. Source areas are shown in numerous previous reports.

Based on observations from the source area removal, diesel fuel released from the dispenser pumps migrated along the east foundation of the Truck Wash Building. The former excavation from the four diesel fuel USTs removed in 1990 was actually located further north than previously reported. This excavation, backfilled with granular material, was located immediately west of the dispenser island, beneath the southern end of the Truck Wash Building. Diesel fuel appears to have migrated along the foundation of the building into the granular backfill of the former UST excavation beneath the building. Storm water infiltration through the pavement in this area has leached contamination into shallow groundwater.

A2.4 Chemical-of-Concern and Affected Media

Soil and groundwater analytical data from investigations and corrective actions at the Site indicate that the chemical-of-concern is TPH-d. No BTEX or PAH concentrations were detected in groundwater samples collected in July 2009. Contamination is encountered in saturated and unsaturated soil. Groundwater at a depth of approximately 10 feet bgs and shallow groundwater at a depth of approximately 18 feet bgs is impacted by TPH-d. There is a potential for surface water impact in the granular backfill installed in the trenches of the storm water and sanitary sewer utilities.

A2.5 Extent of Petroleum Hydrocarbons

Subsurface investigations performed in 2006, 2007, and 2009 included: drilling 57 soil borings and collecting 192 soil samples; 49 groundwater grab samples; and 15 groundwater well samples. The soil and groundwater samples were analyzed for TPH-d and other appropriate contaminants-of-concern. The following sections present a summary of those investigations and a comparison to SFBRWQCB ESL Guidance Document.

A2.5.1 Selection of Appropriate ESLs

The Site has been a bakery and product distribution center since the late 1960s and will likely remain a commercial/industrial property in the future. Although some properties in the Site vicinity have been converted to residential buildings and public use areas, the plant is not suitable for this use without major renovations or demolition. Therefore, PSC believes that the ESL selections for commercial/industrial properties were appropriate for the Site. PSC compared TPH-d concentration in shallow soil (<3 meters) and unsaturated deeper soil (>3 meters) at the Site to both the residential and commercial/industrial ESL to assess the need for environmental land-use restrictions on the property. PSC used the residential ESL for estimating the mass of residual hydrocarbons in soil.

PSC also compared TPH-d concentrations in shallow soil to the ESL for direct exposure of industrial workers. Because the Site is completely covered by asphalt or concrete pavement or structures, PSC believes that a less stringent direct exposure ESL for construction workers in trenches would be more appropriate for the Site.

Groundwater in the vicinity of the Site is listed as suitable for beneficial use on the SFBRWQCB Basin Plan. However, in PSC's opinion, groundwater beneath the Site and vicinity is not suitable for drinking water due to the yield of the shallow aquifer. Deeper aquifers beneath the Site are not suitable for drinking water due to the close proximity of San Francisco Bay and a potential for salt-water intrusion. Therefore, PSC selected the appropriate ESL for sites where groundwater is not a current or potential drinking water resource for comparison to the soil and groundwater concentrations at the Site.

Analytical data for TPH include chromatograms that are characterized as gasoline, diesel fuel, or motor oil based on the elution time and the pattern of peaks. Concentrations characterized by a laboratory analyst as either motor oil or gasoline could be from diesel fuel contamination. TPH-d was the most frequently detected contaminant in soil or groundwater at the Site. The groundwater ESL of 210 μ g/L for TPH-d was selected for comparison to groundwater concentrations at the Site.

A2.5.2 Comparison of Results to ESLs

PSC compared soil sample data collected from 1989 through 2009 to the appropriate ESL selections listed in Section 2.5.1 of PSC's Tier 1 Risk Assessment. The comparison of shallow soil data and unsaturated deep soil is summarized in the CACR, as well as sample locations where TPH-d concentrations exceeded the ESL.

Based on soil analytical data from 275 soil samples (83 prior to 2006 and 192 after 2006) collected at the Site, only one sample (16TP-1) collected in 1990 exceeded the final ESL for benzene at a concentration of 0.15 mg/kg. As previously reported, two soil samples collected in 1990 (16TP-1 and 15NTW) exceeded the final ESL for TPH-mo at 1,300 mg/kg and 2,700 mg/kg, respectively. A review of the UST Closure Report revealed that these samples were waste characterization samples. This area was later excavated and disposed. Only one soil sample (E-29) exceeded the final residential ESL for TPH-g at 140 mg/kg. This sample was excavated and disposed of during the 2010 source area removal.

Nine shallow and 20 deep soil samples exceeded the final ESL for residential properties where groundwater is not a current or potential drinking water resource. The final ESLs presented for TPH-d in the ESL Document were based on contaminants in soil leaching to groundwater. Minimal groundwater contamination has been detected in the recent quarterly monitoring events. Soil sample locations near these groundwater-monitoring wells have exceeded the ESL for soil leaching to groundwater. This indicates that contaminants have not leached to groundwater in concentrations that result in groundwater contamination exceeding the groundwater ESLs.

The extent of TPH-d in soil was delineated and the results were compared with the residential and commercial ESLs of 100 and 180 mg/kg, respectively for non-drinking water sites. Historical soil sample analytical data are summarized on Tables 1D and 1E of the CACR. Historical groundwater analytical data for well samples is presented in Table 2D and 2E of the CACR.

TPH-d concentrations in historic soil samples and groundwater well samples from July 22, 2009 are shown on geologic cross-sections in Figures 5 and 6 of the CACR.

A2.6 Contaminant Fate and Transport

TPH-d contamination in soil exists in the source areas at depths between 2 and 10 feet bgs. The soil in this depth interval at the Site is typically silt and clay. TPH-d concentrations in soil are a secondary source of contamination of groundwater at the Site. As previously discussed, a permeable saturated sand and gravel layer was observed during the source area removal. Diesel fuel appears to have migrated along the Truck Wash Building foundation and impacted the granular backfill of the former diesel fuel UST excavation. This contamination has leached to groundwater and the granular backfill in this excavation is regarded as a secondary source. This primary and secondary source of contamination has been removed by excavation and disposal as described in this report.

PSC's previous CSM was based on the opinion that storm water infiltrating the pavement has been impacted by diesel fuel in the source areas. Storm water was thought to migrate through granular material in the sub base of the pavement and the backfill of the sanitary sewer. Contaminated storm water in the backfill of the settling tank and sanitary sewer has apparently migrated along the sewer line and contaminated soil beneath King Street. Observations made during the source removal revealed misconceptions in this model. The granular saturated soils encountered at approximately 9 to 10 feet bgs in the excavation was impacted by contaminants migrating along the footing of the Truck Wash Building. This contamination then migrated to the granular backfill material in the former excavation of the four diesel fuel USTs. This excavation was closer to the source than previously reported. This contamination leached to the groundwater in the shallow permeable zone at 10 feet bgs. Based on boring logs, this zone is laterally discontinuous across the Site. This may explain isolated soil contamination found beneath King Street.

The storm water sewers located along the western side of the plant and beneath King Street could also be a conduit for contaminant migration. However, depth of these utilities near the source areas is only 3-4 feet deep. Based on shallow soil samples near the on-site storm sewers, there is less of a potential for these to be a migration pathway.

Groundwater beneath the Site is encountered in semi-confined conditions. Shallow groundwater was encountered at approximately 10 feet bgs in some borings and in the former UST system excavations. The primary transport mechanisms for residual contamination in the shallow aquifer are advection, adsorption, desorption, and volatilization. Laboratory analytical data from historic subsurface investigations indicate that both saturated soil and groundwater are affected in the shallow aquifer and adsorption and desorption between the two phases could be occurring. Residual petroleum-hydrocarbon contamination around the former diesel pump island and waste oil UST excavation may have migrated with groundwater through advection. It may also be possible that TPH-d contamination has migrated from the former diesel pump island source area

through the shallow groundwater in the shared excavation of the former oven fuel tanks. Minor groundwater contamination in wells MW-101 through MW-104 is likely the result of this contaminant transport.

Volatilization of petroleum-hydrocarbon constituents from soil and groundwater into vapor can result in migration to the ground surface or into buildings. However, based on the low volatility of diesel and the clay nature of the soil, contaminant transport through this migration pathway has less of a potential to be complete.

A2.7 Potential Exposure Pathways and Receptors

Potential exposure pathways and receptors at the Site and nearby properties were evaluated based on current and potential future use. The Site is currently an active commercial and industrial property with nearby land used for commercial, industrial, and residential purposes. The plant and retail store occupy approximately 90 percent of the Site and both have concrete floors. The remaining surfaces at the Site are paved with either asphalt or concrete.

Potentially complete exposure pathways and receptors were identified for the Site using the following criteria:

- A point of potential contact with impacted medium (referred to as the exposure point); and
- An exposure route at the point of contact (inhalation, ingestion, or dermal contact).

Site-specific, potentially complete exposure pathways and potential receptors are summarized below:

- Inhalation of chemicals volatilizing from soil or groundwater to indoor or outdoor air (residential, commercial, or industrial receptors);
- Inhalation of volatiles, dermal contact, or incidental ingestion of contaminated soil or groundwater through excavation (industrial or construction workers);
- Ingestion of or dermal contact with contaminated groundwater from a potential current or future water supply well (residential, commercial, or industrial receptors); and
- Dermal contact with or incidental ingestion of contaminated surface water (residential, commercial, or industrial receptors or construction workers).

The vapor-intrusion pathway from impacted soil and/or groundwater to outdoor or indoor air is potentially complete. However, diesel contamination is not very volatile and the soil beneath the Site is silty clay. In addition, the bakery building and buildings near the Site have elevated slabs.

The nearest receptors are the bakery plant, which has an elevated floor slab on the west side of the building. Soil vapor intrusion into this building is not likely to occur. The completion of this potential exposure pathway is not very likely. Based upon analytical data from historical subsurface investigations and soil vapor intrusion surveys from similar sites, PSC believes that a soil-vapor intrusion study is unnecessary to evaluate the potential health risks associated with exposure via inhalation of volatiles from the subsurface.

Based on the presence of paved surfaces at the Site, industrial workers, and occupants will not be subjected to direct exposure (ingestion and/or dermal contact) with residual petroleumhydrocarbon constituents in near surface or subsurface soil for current land use at the Site. However, construction workers could have direct exposure to residual contamination in near surface and subsurface soil, if excavation occurs in the future.

Potential exposure by ingestion and/or dermal contact with impacted groundwater at the Site is minimal considering the Site is serviced by the EBMUD. Two abandoned public water supply wells (PRW1 and PRW2) are located northeast of the Site within 2,000 feet. One of the wells is located approximately 700 feet north-northeast and the other water well is approximately 1,400 feet east-northeast of the Site. Both abandoned water supply wells are hydraulically up gradient of the Site. Environmental Data Resources (EDR) records do not indicate any active water supply or irrigation wells within the search radius. The future installation of shallow water-producing wells within the contaminant plume could create a direct and complete exposure pathway. However, the probability of a water supply well installed in an industrial area this close to the Brooklyn Basin is very low.

If contaminated groundwater discharge to surface water occurs, then a potentially complete exposure pathway for off-site receptors and/or construction workers could exist. Based upon a sensitive receptor survey, the closest surface water body to the Site is the Brooklyn Basin within the Oakland Estuary located approximately 800 feet southwest and down gradient of the Site. An unnamed creek flows into the Brooklyn Basin about 1,800 feet northwest of the Site. Wetlands were identified on the EDR figures within 2,000 feet of the Site and generally correspond to the margins of the estuary. There is a potential for surface water impact from storm water sewers, however based on sample results near the sewer (E-45 and E-46) concentrations exceeding ESLs are limited to a small area. Discharge of contaminated groundwater to surface water at levels that exceed the ESL for marine habitats is unlikely.

Construction workers may have direct exposure to residual contamination in groundwater, if excavation and/or dewatering activities occur at the Site in the future. There is also a potential construction-worker exposure risk for excavation work on utilities beneath King Street. It is PSC's opinion that source removal and natural attenuation should significantly reduce the potential exposure.

A2.8 Residual Petroleum Hydrocarbons in Soil

In previous reports, PSC compared historic shallow and deep soil sample analytical data to the ESL for gross contamination of commercial/industrial properties where groundwater is not a current or potential drinking water resource. Samples that exceeded the ESL were generally in the primary source area of former diesel pump island with the exception of E-49 in King Street. PSC also compared analytical data with the ESL for shallow and deep soil for residential and commercial/industrial properties where groundwater is not a current or potential drinking water resource. Summaries of these comparisons are presented in the Tier 1 Risk Assessment and Request for Closure.

Based on extrapolation of TPH-d concentrations in soil at the Site, areas with concentrations exceeding the gross contamination ESL include approximately 600-700 ft² at the former diesel pump island and approximately 100-150 ft² located near E-49 in King Street. In addition to the primary source area, residual petroleum-hydrocarbon concentrations above the final ESL are encountered in a 8,200 ft² area that includes the former diesel pump island, shared diesel UST excavation, and former 350-gallon waste oil UST excavation.

PSC originally estimated the extent of residual petroleum hydrocarbons in soil (pre-source removal) above ESLs to be an area of approximately 7,600 ft² near the former diesel pump island and shared diesel UST excavation. This area extends west into King Street. PSC estimated a second area of approximately 600 ft² near the former 350-gallon waste oil UST excavation located near the southwest corner of the former Truck Maintenance Garage. Using a thickness of 17 feet and average concentrations of samples exceeding the ESLs, PSC estimated approximately 5,782 Kg of TPH-d in soil.

PSC has revised these (pre-source area removal) estimates to include all samples collected in areas that are delineated by the samples exceeding the ESLs. The original estimate was biased high because samples with trace amounts of contaminants or samples with no detectable contaminants were not included in the average concentration in those areas. In addition, samples previously used in the average were samples originally collected before over excavation of soil in 1990 and 1991. A review of the UST removal reports indicate these source area soils were subsequently removed. In addition, the unit weight of soil was revised based on data from the source removal. The revised estimate of 3,382 Kg was based on all samples collected in three areas including a small area (50 ft^2), a medium sized area around the former Truck Maintenance Garage (1,500 ft^2), and a large area around the diesel fuel dispenser island stretching out into King Street (6,400 ft^2). This revised mass estimate is presented in Table 3A of the CACR.

PSC calculated the mass of TPH-d removed during the source area removal using the unit weight of soil calculated by weigh tickets and the dimensions of the excavation together with the concentrations of all soil samples collected in the mass removed. This resulted in approximately 1,552 Kg of TPH-d removed. This mass estimate is presented in Table 3B of the CACR.

The area of residual hydrocarbons in the three areas (post-source area removal) was then calculated using the three areas and subtracting the volume of source area soil removed. This resulted in an estimate of only 748 Kg of TPH-d. These three estimates do not balance out due to the significant reduction in the average concentrations used. PSC believes a good estimate of residual TPH-d is a range of between 748 kg and 1,800 kg of TPH-d. The post source removal mass estimate is presented on Table 3C of the CACR. Input parameters for each estimate are presented in Table 5 of the CACR.

A2.9 Residual Petroleum Hydrocarbons in Groundwater

Groundwater grab samples collected from open boreholes during historic Site investigations are not representative of groundwater quality and could have residual petroleum hydrocarbons in suspended sediments. Based on this opinion, concentrations of TPH-d in groundwater grab samples were not included in the ESL comparisons. However, these groundwater grab samples were used to estimate the area where residual hydrocarbons are found. Groundwater is encountered in semi-confined conditions at a depth of approximately 10 feet in the source area and 20 feet bgs over most of the Site. The rise in water levels after encountering the permeable zone at the Site indicates an upward vertical gradient on groundwater. A total thickness of 20 feet for groundwater was used for the mass estimates.

PSC originally used groundwater samples from a single groundwater monitoring event. Based on the opinion that residual hydrocarbons may be remaining near areas where grab samples were collected, the area of impact was estimated in a larger area. Average concentrations in the wells in these areas were used. This resulted in an estimate of 0.55 Kg of TPH-d in groundwater.

The groundwater analytical data from the post source area removal indicates that TPH-d concentrations in groundwater samples from the monitoring wells were below the ESL of 210 μ g/L for sites where groundwater is not a current or potential drinking water resource. Concentrations of BTEX or PAHs were not detected in any groundwater samples analyzed from the semi-annual groundwater-monitoring events. A concentration of TPH-d of 250 μ g/L exceeded the 210 μ g/L ESL in well MW-102 during January 6, 2012 sampling event. However, a duplicate sample collected and analyzed, had a concentration of 110 μ g/L. This is a relative percent difference (RPD) of 78%, indicating a quality control issue. Consideration of this RPD and the historical concentrations of TPH-d in well MW-102 indicate the 250 μ g/L result is biased high.

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ATTACHMENT B

BLAINE TECH SERVICES, INC. FIELD REPORT

PSC INDUSTRIAL OUTSOURCING, LP 210 West Sand Bank Road, Columbia, IL 62236 (618) 281-1543 Fax (618) 281-7020

WELLHEAD INSPECTION CHECKLIST

Page _____ of ____

	Well Inspected	Water Bailed	Wellbox		chnician V		Other Action	Well Not
Well ID	No Corrective Action Required	From Wellbox	Components Cleaned	Cap Replaced	Removed From Wellbox	Lock Replaced	Taken (explain below)	Inspected (explain below)
MW-IDI	6							
MVC-102	Ø							
MW-103	~~							
MW-104		\sim						
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WELL GAUGING DATA

Project # 120106 - 101 Date 1/6/12 Client PSG

Site 955 KENNEDY ST, DAKLAND, CA

Well ID	Time	Well Size (in.)	Sheen / Odor	Depth to Immiscible Liquid (ft.)	Thickness of Immiscible Liquid (ft.)	Depth to water (ft.)	Depth to well bottom (ft.)	Survey Point: TOB or FOC	Notes
Mw - (0)	0816	2				9.10	27.87		
MW-102	ન્સર	2				11.31	28.22	The subject of the su	
MW-103	0814	2				8.80	24.69		
MW-104	+0810	2				8.72	24.89		
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BLAINE TECH SERVICES, INC.

SAN JOSE SACRAMENTO LOS ANGELES SAN DIEGO

SEATTLE www.blainetech.com

WELL MONITORING DATA SHEE ſ

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Project #:	120100	6 - WV	~ 1	Client: PSC		
Sampler:	\sim			Date: 1/6/12		:
Well I.D.:	MW-1	01		Well Diamete	C 3 4	6 8
Total Well	Depth (TI	D): 27	.97	Depth to Wate	er (DTW): 9.	10
Depth to Fi	ree Produc	:t:	-	Thickness of I	Free Product (fe	et):
Referenced	l to:	PVC) Grade	D.O. Meter (it	f req'd):	YSI HACH
DTW with	80% Rech	narge [(H	leight of Water	Column x 0.20) + DTW]: (2	35
Purge Method:	Bailer Disposable I Positive Air Electric Sub	Displaceme	ent Extrac Other	Waterra Peristaltic ction Pump	Sampling Method	Disposable Bailer Extraction Port Dedicated Tubing
<u> </u>	Gals.) X <u>3</u> Spec	ified Volun	$\frac{9.0}{\text{Calculated Vc}}$	Gals. 3"		Diameter Multiplier 0.65 1.47 radius ² * 0.163
Time	Temp	pH	Cond. (mS or as)	Turbidity (NTUs)	Gals. Removed	Observations
0929	14.9	7.63	1703	136	3	
0934	182	7.45	1543	3.86	6	
0939	13.0	7.46	1444	>1000 *	9	· · · · · · · · · · · · · · · · · · ·
						· · ·
			1993 - ALINA JANUN ANG ANG ANG ANG ANG ANG ANG ANG ANG AN			
Did well dev	water?	Yes 🤇	No	Gallons actual	ly evacuated:	7
Sampling D	ate: 1/6/	12	Sampling Time	e: 0945	Depth to Wate	r: 10.31
Sample I.D.:	: MW-I	01		Laboratory:	Kiff CalScience	e Other
Analyzed fo	r: TPH-G	BTEX	MTBE TPH-D	Oxygenates (5)	Other:)PAHS	
EB I.D. (if a	pplicable)		@ Time	Duplicate I.D.	(if applicable):	
Analyzed for	r: TPH-G	BTEX	MTBE TPH-D	Oxygenates (5)	Other:	
D.O. (if req'o	1): Pr	e-purge:		^{mg} /L P	ost-purge:	^{mg} / _L
O.R.P. (if red	q'd): Pr	e-purge:		mV P	øst-purge:	mV

Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112 (408) 573-0555

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WELL MONITORING DATA SHEEF

Project #:	120100	6 - WI	~ (Client	PSC			·
Sampler:	\sim			Date:	1/6/12			
Well I.D.:	MW-1	02		Well I	Diameter	:0	3 4	6 8
Total Well	Depth (TI	D): 29	, .22	Depth	to Wate	r (DTW): [[.	31
Depth to Fr	ree Produc	:t:		Thickr	less of F	ree Proc	luct (fe	et):
Referenced	l to:	PVC	Grade	D.O. N	leter (if	req'd):	· · · · · · · · · · · · · · · · ·	YSI HACH
DTW with	80% Rech	arge [(I	leight of Water	Colum	1 x 0.20)) + DTV	/]: <i>(</i>	4.69
Purge Method:	Bailer Disposable I Positive Air Electric Sub	Displacem	ent Extra Other	Waterra Peristaltic ction Pump	Well Diamete	,	g Method Other: a Well	Disposable Bailer Extraction Port Dedicated Tubing
2.7 (1 Case Volume	Gals.) X <u>3</u> Speci	ified Volun	$\frac{1}{1} = \frac{3 \cdot 1}{Calculated Vol$	_Gals.	1" 2" 3"	0.04 0.16 0.37	4" 6" Other	0.65 1.47 radius ² * 0.163
Time	Temp (°F or C)	pH	Cond. (mS or (S))	1	oidity TUs)	Gals. R	emoved	Observations
0957	14-3	7.55	1521	19	8	2.7		
1002	157	7.29	1548	>/:	00	5.	4	
1006	16.7	7.17	1544	51	000	8,	(
						1.9		
Did well dev	vater?	Yes 🤇	No	Gallons	actually	y evacua	ited: S	2.1
Sampling Da	ate: 1/6/	12	Sampling Time	e: / U {	3 9	Depth t	o Water	: 12,90 m
Sample I.D.:	MW-1	02		Laborat	ory: 🤇	Kiff C	alScience	Other
Analyzed for	C: TPH-G	BTEX	MTBE TPH-D	Oxygena	tes (5) (Other: P	AHS	
EB I.D. (if a _l	oplicable):		@ Time	Duplica	te I.D. (if applic	able):	DUPLICATE C 1130
Analyzed for	: TPH-G	BTEX	MTBE TPH-D	Oxygena		Other:		· · · · · · · · · · · · · · · · · · ·
D.O. (if req'd	l): Pro	e-purge:		mg/L	· Po	ost-purge		mg
D.R.P. (if rec	l'd): Pre	e-purge:		mV	. Pc	st-purge		mV
				Ţ	TQ100	BLANK	n Co	735

Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112 (408) 573-0555

WELL MONITORING DATA SHEET

Project #:	120100	6 - WI	~ 1	Client	:PSC		· · · · · · · · · · · · · · · · · · ·					
Sampler:	ww	j4		Date:	1/6/12							
Well I.D.:	MW-1	03		Well J	Diameter	·2 3 4	6 8					
Total Well	Depth (TI	D): 24	69	Depth	to Wate	r (DTW): 3.3	0					
Depth to F	ree Produc	t:	~	Thick	Thickness of Free Product (feet):							
Referenced	l to:	PVC	Grade	D.O. 1	D.O. Meter (if req'd): YSI HACH							
DTW with	80% Rech	arge [(I	Height of Water	Colum	n x 0.20)) + DTW]: \/ (98					
Purge Method:	Bailer Disposable I Positive Air Electric Sub	Displacem	ent Extrac	Waterra Peristaltic ction Pump	2	Sampling Method	Disposable Bailer Extraction Port Dedicated Tubing					
2.5 1 Case Volume	(Gals.) X <u>3</u> Spec	ified Volur	$\frac{1}{1} = \frac{7 s}{Calculated Vc}$	Gals.	Well Diamete 1" 2" 3"	t er Multiplier Well 0.04 4" 0.16 6" 0.37 Other	Diameter Multiplier 0.65 1.47 radius ² * 0.163					
Time CAS1	Temp (°F or C)	рн 7.69	Cond. (mS or µ\$)) 7472	1	bidity TUs) 20	Gals. Removed	Observations					
0855	15.8	7.57	766	50		5	;					
0359	16.8	753	7.8.	700		75						
;							· · · · · · · · · · · · · · · · · · ·					
			Altajo				· ·					
Did well de	water?	Yes	No	Gallon	s actually	y evacuated:	2.5					
Sampling D	ate: 1/6/	12	Sampling Time	: 09	105	Depth to Wate	r: 8.85					
Sample I.D.	: MW-1	03		Labora	tory: 🤇	Kiff CalScience	e Other					
Analyzed fo	r: TPH-G	BTEX	MTBE TPH-D	Oxygen	ates (5) (Other: PAHs						
B I.D. (if a	pplicable)	•	Image: Control of the second s	Duplic	ate I.D. (if applicable):	i i i i i i i i i i i i i i i i i i i					
nalyzed fo	r: TPH-G	BTEX	MTBE TPH-D	Oxygen	ates (5)	Other:	······································					
).O. (if req'	d): Pr	e-purge:		^{mg} /L	Po	ost-purge:	mg/L					
.R.P. (if re	q'd): Pr	e-purge:		mV	_ Po	ost-purge:	mV					
							with the second se					

Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112 (408) 573-0555

WELL MONITORING DATA SHEET

Project #:	120106	6 - WK	~ 1	Client: PSC		
Sampler:	NN			Date: 1/6/12		
Well I.D.:	MW-1	04		Well Diameter	:(2) 3 4	6 8
Total Well	Depth (TI):24	69	Depth to Wate	r (DTW): 🗟 🦪	12
Depth to Fi	ree Produc	:t:		Thickness of F	Free Product (fe	eet):
Referenced	to:	PVC) Grade	D.O. Meter (if	req'd):	YSI HACH
DTW with	80% Rech	arge [(F	leight of Water	Column x 0.20) + DTW]: //.	91
Purge Method:	Bailer Disposable I Positive Air Electric Subi	Displacem	ent Extrac Other	Waterra Peristaltic ction Pump	Sampling Method	Disposable Bailer Extraction Port Dedicated Tubing
2.6 1 Case Volume	Gals.) X $\frac{3}{\text{Speci}}$	ified Volun	$\frac{1}{1} = \frac{1}{2} \frac{8}{2}$	Gals	er Multiplier Well 0.04 4" 0.16 6" 0.37 Othe	Diameter Multiplier 0.65 1.47 er radius ² * 0.163
Time 0824	Temp (°F or \bigcirc	рН Э. ЗЧ	Cond. (mS or µ8)) 683	Turbidity (NTUs)	Gals. Removed	Observations
0829	16.4	7.26	699	5,000	5-2	
0833	R. 4	7.76	768	51000	7.3	
				e de la companya de l		
				artin Antin (1997) Antin (1997)		
Did well dev	vater?	Yes 🏼 🤇	No	Gallons actuall	y evacuated:7	8
Sampling Da	ate: 1/6/	12	Sampling Time	. DRHO	Depth to Wate	r: 7.00
Sample I.D.:	MW-1	04		Laboratory: (Kiff CalScienc	
nalyzed for	r: TPH-G	BTEX	MTBE (TPH-D)	Oxygenates (5)	Other:)PAHs	
EB I.D. (if a	pplicable)	: : :	@ Time	Duplicate I.D. ((if applicable):	······································
nalyzed for	T: TPH-G	BTEX	MTBE TPH-D	Oxygenates (5)	Other:	
).O. (if req'a	l): Pr	e-purge:		^{mg} /L P	ost-purge:	mg/L
).R.P. (if red	ą'd): Pr	e-purge:		mV P	ost-purge:	mV

Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112 (408) 573-0555

TEST EQUIPMENT CALIBRATION LOG

955 KENNEDY ST, OMMIAND, CA

NE PSC CEA	ARTH GRAINS		PROJECT NUMBER 120106-Mar 1							
EQUIPMENT NUMBER	DATE/TIME OF TEST	USED	READING	OR WITHIN 10%:	TEMP.	INITIAL				
6209577	1/6/220	PH: 4.7,10 and 3900200	pH. 7.00,1200 cond 290010	Yes	B.1°C	inn				
				,						
			:							
				- <u>-</u>						
				Senerar and a						
	EQUIPMENT	NUMBER OF TEST していのちつう 1/6/2 0920	EQUIPMENT DATE/TIME STANDARDS NUMBER OF TEST USED 6209577 1/6/2 PH-4.7.10 0920 Cond.3900005	EQUIPMENT DATE/TIME STANDARDS EQUIPMENT NUMBER OF TEST USED EQUIPMENT 6209577 1/6/2 PM-4.7.10 PH-7.00/1000 0920 Gond 390000 Cond. 200000	EQUIPMENT NUMBER DATE/TIME OF TEST STANDARDS USED EQUIPMENT READING CALIBRATED TO: OR WITHIN 10%: 6209577 1/6/2 0920 PM - 4.7.10 wnd - 290000 PM - 4.7.00 4.00000 PM - 4.00000 Yes 6209577 1/6/2 0920 PM - 4.7.10 wnd - 290000 PM - 4.00000 Yes 6209577 1/6/2 0920 PM - 4.7.10 wnd - 290000 Yes 6209577 1/6/2 0920 PM - 4.7.10 wnd - 290000 Yes 6209577 1/6/2 0920 PM - 4.7.10 wnd - 290000 Yes 6209577 1/6/2 0920 PM - 4.7.10 wnd - 2900000 Yes 6209577 1/6/2 0920 PM - 4.7.10 wnd - 290000 Yes 6209577 1/6/2 wnd - 290000 Yes Yes 6209577 1/6/2 wnd - 290000 Yes Yes 620957 1/6/2 wnd - 290000 Yes Yes 620957 1/6/2 wnd - 290000 1/6/2 wnd - 290000 Yes 620957 1/6/2 wnd - 290000 1/6/2 wnd - 290000 1/6/2 wnd - 290000	EQUIPMENT NUMBER DATE/TIME OF TEST STANDARDS USED EQUIPMENT READING CALIBRATED TO: OR WITHIN 10%: TEMP. 6209577 1/6/2 0920 PH H 7,10 60nd 39 mund PH - 7.00/100 (0nd - 200000) Yes B - 1 °C 0 0920 60nd 39 mund Cond - 200000 Yes B - 1 °C 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				

Client:	
~ ~ ~ ~ /	

<u>P56</u>

Site Address: 955 REANERY 57, OATERAND, LA

STATUS OF DRUM(S) UPON ARRIVAL											
Date	1/6/12				and the second secon						
Number of drum(s) empty:											
Number of drum(s) 1/4 full:											
Number of drum(s) 1/2 full:											
Number of drum(s) 3/4 full:											
Number of drum(s) full:											
Total drum(s) on site:	0										
Are the drum(s) properly labeled?											
Drum ID & Contents:											
If any drum(s) are partially or totally filled, what is the first use date:											

- If you add any SPH to an empty or partially filled drum, drum must have at least 20 gals. of Purgewater or DI Water.

-If drum contains SPH, the drum MUST be steel AND labeled with the appropriate label.

-All BTS drums MUST be labeled appropriately.

STATUS OF DRUM(S) UPON	DEPARTU	IRE				
Date	16/12					
Number of drums empty:						
Number of drum(s) 1/4 full:						
Number of drum(s) 1/2 full:						
Number of drum(s) 3/4 full:						
Number of drum(s) full:						
Total drum(s) on site:	1					
Are the drum(s) properly labeled?	yes					
Drum ID & Contents:	pureze the					
LOCATION OF DRUM(S)						
Describe location of drum(s): パい	corner of	- blog., by	staucase	between	red 1 qu	oun doors)
		J.				
FINAL STATUS						
Number of new drum(s) left on site this event	1					
Date of inspection:	1/6/2					
Drum(s) labelled properly:	y OS					

 Logged by BTS Field Tech:
 WW

 Office reviewed by:
 IMD

ATTACHMENT C

KIFF ANALYTICAL, LLC LABORATORY REPORT

PSC INDUSTRIAL OUTSOURCING, LP 210 West Sand Bank Road, Columbia, IL 62236 (618) 281-1543 Fax (618) 281-7020



Laboratory Results

John Carrow Philip Services Corp 210 W Sand Bank Road Columbia, IL 62236

Subject : 6 Water Samples Project Name : Earthgrains Baking Companies, Inc. Project Number : 120106-WW1 P.O. Number : 10000158877

Dear Mr. Carrow,

Chemical analysis of the samples referenced above has been completed. Summaries of the data are contained on the following pages. Sample(s) were received under documented chain-of-custody. US EPA protocols for sample storage and preservation were followed. Testing procedures comply with the 2003 NELAC standard. All soil samples are reported on a total weight (wet weight) basis unless noted otherwise in the case narrative. Laboratory results relate only to the samples tested. This report may be freely reproduced in full, but may only be reproduced in part with the express permission of Kiff Analytical, LLC. Kiff Analytical, LLC is certified by the State of California under the National Environmental Laboratory Accreditation Program (NELAP), lab # 08263CA. If you have any questions regarding procedures or results, please call me at 530-297-4800.

Sincerely,

kl Kiff∥



Sample : MW-101		Matrix : V	Water	Lab Number : 79995-01				
Sample Date :01/06/2012 Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed			
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:07			
Toluene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:07			
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:07			
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:07			
1,2-Dichloroethane-d4 (Surr)	98.5		% Recovery	EPA 8260B	01/07/12 02:07			
Toluene - d8 (Surr)	100		% Recovery	EPA 8260B	01/07/12 02:07			
TPH as Diesel	100	50	ug/L	M EPA 8015	01/12/12 20:53			
Octacosane (Diesel Surrogate)	89.0		% Recovery	M EPA 8015	01/12/12 20:53			



Sample : MW-102		Matrix :	Water	Lab Number : 79995-02				
Sample Date :01/06/2012 Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed			
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:41			
Toluene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:41			
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:41			
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 02:41			
1,2-Dichloroethane-d4 (Surr)	98.9		% Recovery	EPA 8260B	01/07/12 02:41			
Toluene - d8 (Surr)	100		% Recovery	EPA 8260B	01/07/12 02:41			
TPH as Diesel	250	50	ug/L	M EPA 8015	01/12/12 22:01			
Octacosane (Diesel Surrogate) 89.6			% Recovery	M EPA 8015	01/12/12 22:01			



Sample : MW-103		Matrix : V	Water	Lab Number : 79995-03				
Sample Date :01/06/2012 Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed			
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:16			
Toluene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:16			
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:16 01/07/12 03:16			
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B				
1,2-Dichloroethane-d4 (Surr)	98.8		% Recovery	EPA 8260B	01/07/12 03:16			
Toluene - d8 (Surr)	101		% Recovery	EPA 8260B	01/07/12 03:16			
TPH as Diesel (Note: Discrete peaks in Diesel range, at <u>y</u>	60 /pical for Diesel	50 Fuel.)	ug/L	M EPA 8015	01/12/12 23:44			
Octacosane (Diesel Surrogate)	97.4		% Recovery	M EPA 8015	01/12/12 23:44			



Sample : MW-104		Matrix : V	Water	Lab Number : 79995-04			
Sample Date :01/06/2012 Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed		
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:50		
Toluene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:50		
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:50		
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 03:50		
1,2-Dichloroethane-d4 (Surr)	97.7		% Recovery	EPA 8260B	01/07/12 03:50		
Toluene - d8 (Surr)	101		% Recovery	EPA 8260B	01/07/12 03:50		
TPH as Diesel	79	50	ug/L	M EPA 8015	01/13/12 00:18		
Octacosane (Diesel Surrogate) 97.4			% Recovery	M EPA 8015	01/13/12 00:18		



Sample : DUPLICATE		Matrix :	Water	Lab Number : 79995-05			
Sample Date :01/06/2012 Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed		
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 04:25		
Toluene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 04:25		
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 04:25		
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	01/07/12 04:25		
1,2-Dichloroethane-d4 (Surr)	99.8		% Recovery	EPA 8260B	01/07/12 04:25		
Toluene - d8 (Surr)	101		% Recovery	EPA 8260B	01/07/12 04:25		
TPH as Diesel	110	50	ug/L	M EPA 8015	01/13/12 00:52		
Octacosane (Diesel Surrogate) 95.7			% Recovery	M EPA 8015	01/13/12 00:52		



Sample : TRIP BLANK		Matrix : \	Water	Lab Number : 79995-06				
Sample Date :01/06/2012		Method						
Parameter	Measured Value	Reporting	Units	Analysis Method	Date/Time Analyzed			
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/09/12 12:44			
Toluene	< 0.50	0.50	ug/L	EPA 8260B	01/09/12 12:44			
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/09/12 12:44			
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	01/09/12 12:44			
1,2-Dichloroethane-d4 (Surr)	101		% Recovery	EPA 8260B	01/09/12 12:44			
Toluene - d8 (Surr)	102		% Recovery	EPA 8260B	01/09/12 12:44			

Data
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Method
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Project Name : Earthgrains Baking Companies, Inc.

Project Number : 120106-WW1

Parameter	Measured Value	Method Reporting Limit	g Units	Analysis Method	Date Analyzed
TPH as Diesel	< 50	50	ng/L	M EPA 8015	01/11/2012
Octacosane (Diesel Surrogate)	100		%	M EPA 8015	01/11/2012
Benzene	< 0.50	0.50	ug/L	EPA 8260B	01/09/2012
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	01/09/2012
Toluene	< 0.50	0.50	ng/L	EPA 8260B	01/09/2012
Total Xylenes	< 0.50	0.50	ng/L	EPA 8260B	01/09/2012
1,2-Dichloroethane-d4 (Surr)	99.3		%	EPA 8260B	01/09/2012
Toluene - d8 (Surr)	101		%	EPA 8260B	01/09/2012
Benzene	< 0.50	0.50	ua/L	EPA 8260B	01/06/2012
Ethylbenzene	< 0.50	0.50	ng/L	EPA 8260B	01/06/2012
Toluene	< 0.50	0.50	ng/L	EPA 8260B	01/06/2012
Total Xylenes	< 0.50	0.50	ng/L	EPA 8260B	01/06/2012
1,2-Dichloroethane-d4 (Surr)	97.9		%	EPA 8260B	01/06/2012
Toluene - d8 (Surr)	100		%	EPA 8260B	01/06/2012

Report Number: 79995 Date: 01/13/2012 Method Measured Reporting Analysis Date Value Limit Units Method Analyzed

Parameter

KIFF ANALYTICAL, LLC

2795 2nd Street, Suite 300 Davis, CA 95618 530-297-4800

Project Name : Earthgrains Baking Companies, Inc. Project Number : 120106-WW1

Duplicate Spiked Duplicate Spiked Sample Relative Spiked Spike Spiked Spiked Sample Sample Relative Percent Percent Sample Spiked Sample Spike Dup. Sample Analysis Date Percent Percent Percent Recov. Diff. Parameter Value Method Sample Value Lėvel Level Value Units Analyzed Recov. Recov. Limit Limit Diff. TPH as Diesel BLANK <50 1000 1000 936 893 M EPA 8015 1/11/12 93.6 89.3 4.65 70-130 25 ug/L Benzene 79996-01 < 0.50 40.0 40.0 38.8 38.0 EPA 8260B 1/9/12 97.1 95.1 2.02 80-120 25 ug/L Ethylbenzene 79996-01 < 0.50 40.0 40.0 40.6 39.2 EPA 8260B 1/9/12 101 98.1 3.39 80-120 25 ug/L P + M Xylene 79996-01 < 0.50 40.0 40.0 40.3 39.2 EPA 8260B 1/9/12 101 98.1 2.74 76.8-120 25 ug/L Toluene 79996-01 < 0.50 40.0 40.0 40.7 39.4 EPA 8260B 1/9/12 102 98.4 3.31 80-120 25 ug/L Benzene 1/6/12 98.5 96.1 79980-12 < 0.50 40.0 40.0 39.4 38.4 ug/L EPA 8260B 2.46 80-120 25 Ethylbenzene 1/6/12 79980-12 < 0.50 40.0 40.0 38.0 36.7 ug/L EPA 8260B 95.1 91.8 3.57 80-120 25 P + M Xylene 79980-12 < 0.50 40.0 40.0 38.8 37.8 ug/L EPA 8260B 1/6/12 97.1 94.4 2.76 76.8-120 25 Toluene 79980-12 < 0.50 40.0 40.0 39.0 38.0 ug/L EPA 8260B 1/6/12 97.6 95.1 2.57 80-120 25

Page 9 of 12

KIFF ANALYTICAL, LLC

2795 2nd Street, Suite 300 Davis, CA 95618 530-297-4800

QC Report : Laboratory Control Sample (LCS)

Project Name : Earthgrains Baking Companies, Inc. Project Number : 120106-WW1

LCS Percent LCS Spike Level Analysis Method Date Percent Recov. Parameter Units Analyzed Limit Recov. EPA 8260B 1/9/12 80-120 ug/L Benzene 40.1 97.6 Ethylbenzene ug/L EPA 8260B 1/9/12 105 80-120 40.1 P + M Xylene EPA 8260B 1/9/12 40.1 ug/L 104 76.8-120 Toluene ug/L EPA 8260B 1/9/12 103 80-120 40.1 39.9 EPA 8260B Benzene ug/L 1/6/12 97.6 80-120 Ethylbenzene 39.9 ug/L EPA 8260B 1/6/12 94.2 80-120 P + M Xylene EPA 8260B 1/6/12 76.8-120 39.9 ug/L 96.7 Toluene 39.9 ug/L EPA 8260B 1/6/12 96.9 80-120

KIFF ANALYTICAL, LLC

2795 2nd Street, Suite 300 Davis, CA 95618 530-297-4800

BLAINE	SA			DGERS AVE RNIA 95112-			CON	IDUCT		S TO DE	TECT	LAB ALL ANALYSES MUS		1999	- DHS#
ECH SERVICES	-		FA	X (408) 573- E (408) 573-	7771								A DHS AND		
HAIN OF CUSTODY	BTS #	12010	<u> </u>	u w1											
LIENT PSC					CONTAINERS							SPECIAL INSTRUC	IONS		parties in the second s
ITE Earth	grains Bal	king Co	mpani	es, Inc.								Invoice & Repo	rt to PSC	Attn John	Carrow
	ennedy S											210 West Sand			
	nd, CA			<u> </u>	ITE A	(8260B)	SM)					PSC Project # (,	02230
I	1	MATRI) TIO QL H ⁰ OS		NTAINERS	AP	BTEX (82	H-d (8015M)	H's (8310)				cc:jcarrow@pscn Ph. 618-792-2468		J	1
MPLE I.D. DATE	TIME	S= SOIL W=H ₂ 0	TOTAL	2-11 Amb	- ū	BT	TPH-d	PAH'				ADD'L INFORMATIO	N STATUS		LAB SAMPLE #
NW-121 161	2 0945	w	7			Ś	Ý	φ							0(
nw+102	1030		7			8	Ý	0							07
nw-103	0995		7			$\langle \boldsymbol{\lambda} $	Ą	Ø							0
NW-104	086		7			Ø	\$	Q							OL
UPLION TE	130	↓	7	+		8	0								05
TRIP BLANK	0735	4	2	24C1 100	ns	2	46	-						-	06
					,										
MPLING DATE	TIME 1130	SAMPLI PERFO		will i W	m	-						RESULTS NEEDED	Standard TA		
LEASED BY								TIME				≠©		DATE	
						6/17		TIME	52		IVED BY			DATE 1/6/n	TIME
LEASED BY					DAT	E		TIME		┩ ∽୵	IVED BY	Ant	applicaem		TIME 2 1152
IIPPED VIA					DAT	E SEN	r	TIME S	ENT	cool	ER#	· · ·	<u> </u>		

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KIFF	RECEIVER
Analytical LLC SAMPLE RECEIPT CHECKLIST	Initials
Project ID: <u>Earthgrains Baking Companies</u> , Inc.	
Project ID: <u>Farthgrains Baking Companies</u> , Inc. Method of Receipt: Courier Over-the-counter Shipper	
COC Inspection Is COC present? Custody seals on shipping container? Is COC Signed by Relinquisher? Yes Is sampler name legibly indicated on COC? Is analysis or hold requested for all samples Is the turnaround time indicated on COC?	present ⊠ N/A] No, Cross-outs
Do containers match COC? Yes No No, COC lists absent sample(s) No, Extra sample(s) Are there samples matrices other than soil, water, air or carbon? Yes No Are any sample containers broken, leaking or damaged? Yes No	Not present
Quicklog Are the Sample ID's indicated: On COC On sample container(s) On Both If Sample ID's are listed on both COC and containers, do they all match? Yes No Is the Project ID indicated: On COC On sample container(s) On Both Not include If project ID is listed on both COC and containers, do they all match? Yes No N/A Are the sample collection dates indicated: On COC On sample container(s) On Both N/A If collection dates are listed on both COC and containers, do they all match? Yes No No Include If collection times are listed on both COC and containers, do they all match? Yes No No Include Include No Include IncludeInclu	Not indicated N/A Not indicated N/A

-

O:\old_ed\samprec\Forms\Sample Receipt Checklist rev 051409.doc

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Subcontract Laboratory Report Attachments

2795 Second Street, Suite 300 Davis, CA 95618 tel 530.297.4800 fax 530.297.4808 www.kiffanalytical.com



WORK ORDER NUMBER: 12-01-0409

The difference is service



AIR SOIL WATER MARINE CHEMISTRY

Analytical Report For Client: Kiff Analytical Client Project Name: Earthgrains Baking Companies, Inc. Attention: Joel Kiff 2795 2nd Street, Suite 300 Davis, CA 95616-6593

Amande Porter

Approved for release on 01/13/2012 by: Amanda Porter Project Manager



ResultLink >

Email your PM >

Calscience Environmental Laboratories certifies that the test results provided in this report meet all NELAC requirements for parameters for which accreditation is required or available. Any exceptions to NELAC requirements are noted in the case narrative. The original report of subcontracted analyses, if any, is provided herein, and follows the standard Calscience data package. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety. Note that the Chain-of-Custody Record and Sample Receipt Form are integral parts of this report.



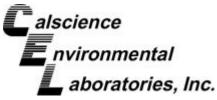
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Contents



Client Project Name: Earthgrains Baking Companies, Inc. Work Order Number: 12-01-0409

1	Client Sample Data	3 3
2	Quality Control Sample Data 2.1 LCS/LCSD	5 5
3	Glossary of Terms and Qualifiers	6
4	Chain of Custody/Sample Receipt Form	7





Kiff Analytical

nelac
01/07/12

Kiff Analytical 2795 2nd Street, Suite 300 Davis, CA 95616-6593)				Date Rea Work Or Preparat Method: Units:	der No:				12- EP	01/07/12 01-0409 A 3510C PA 8310 ug/L
Project: Earthgrains Bakin	g Comp	anies,	Inc.							Pa	ge 1 of 2
Client Sample Number				ab Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared		e/Time Ilyzed	QC Batch ID
MW-101			12-01-	0409-1-A	01/06/12 09:45	Aqueous	HPLC 5	01/09/12		09/12):20	120109L02
Parameter	<u>Result</u>	<u>RL</u>	<u>DF</u>	Qual	Parameter			<u>Result</u>	<u>RL</u>	DF	Qual
Naphthalene	ND	1.0	1		Benzo (a) An	thracene		ND	1.0	1	
Acenaphthylene	ND	1.0	1		Chrysene			ND	1.0	1	
Acenaphthene	ND	1.0	1		Benzo (b) Flu			ND	1.0	1	
Fluorene	ND	1.0	1		Benzo (k) Flu	oranthene		ND	1.0	1	
Phenanthrene	ND	1.0	1		Benzo (a) Py	rene		ND	0.20	1	
Anthracene	ND	1.0	1		Dibenz (a,h)			ND	1.0	1	
Fluoranthene	ND	1.0	1		Benzo (g,h,i)	Perylene		ND	1.0	1	
Pyrene	ND	1.0	1		Indeno (1,2,3	-c,d) Pyrene		ND	1.0	1	
Surrogates:	<u>REC (%)</u>	<u>Control</u> Limits	<u>Qu</u>	al							
Decafluorobiphenyl	54	16-100									
MW-102			12-01-	0409-2-A	01/06/12 10:30	Aqueous	HPLC 5	01/09/12		09/12):53	120109L02
Parameter	<u>Result</u>	<u>RL</u>	DF	Qual	Parameter			Result	RL	DF	Qual
				<u>Quui</u>		thracana					Gua
Naphthalene	ND ND	1.0 1.0	1		Benzo (a) An	unacene		ND ND	1.0	1 1	
Acenaphthylene	ND	1.0	1 1		Chrysene	oranthono		ND	1.0 1.0	-	
Acenaphthene Fluorene	ND	1.0	1		Benzo (b) Flu Benzo (k) Flu			ND	1.0	1 1	
Phenanthrene	ND	1.0	1		Benzo (a) Py			ND	0.20	1	
Anthracene	ND	1.0	1		Dibenz (a,h)			ND	1.0	1	
Fluoranthene	ND	1.0	1		Benzo (g,h,i)			ND	1.0	1	
Pyrene	ND	1.0	1		Indeno (1,2,3	•		ND	1.0	1	
•	REC (%)	Control		al	110010 (1,2,0	-c,u) i yichc			1.0	1	
Surrogates:	<u>REC (70)</u>	Limits									
Decafluorobiphenyl	58	16-100									
MW-103			12-01-	0409-3-A	01/06/12 09:05	Aqueous	HPLC 5	01/09/12		09/12 :25	120109L02
Parameter	Result	RL	DF	Qual	Parameter			Result	RL	DF	Qual
Naphthalene	ND	1.0	1		Benzo (a) An	thracene		ND	1.0	1	
Acenaphthylene	ND	1.0	1		Chrysene			ND	1.0	1	
Acenaphthene	ND	1.0	1		Benzo (b) Flu	oranthene		ND	1.0	1	
Fluorene	ND	1.0	1		Benzo (k) Flu			ND	1.0	1	
Phenanthrene	ND	1.0	1		Benzo (a) Py			ND	0.20	1	
Anthracene	ND	1.0	1		Dibenz (a,h)			ND	1.0	1	
Fluoranthene	ND	1.0	1		Benzo (g,h,i)			ND	1.0	1	
Pyrene	ND	1.0	1		Indeno (1,2,3			ND	1.0	1	
Surrogates:	REC (%)	Control		al					1.0	I	
ounogates.		Limits		<u>ui</u>							
Decafluorobiphenyl	65	16-100									

RL - Reporting Limit , DF - Dilution Factor ,

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Qual - Qualifiers





Page 2 of 2

Kiff Analytical 2795 2nd Street, Suite 300 Davis, CA 95616-6593

Date Received:	01/07/12
Work Order No:	12-01-0409
Preparation:	EPA 3510C
Method:	EPA 8310
Units:	ug/L

Project: Earthgrains Baking Companies, Inc.

Client Sample Number				b Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared		e/Time alyzed	QC Batch ID
MW-104			12-01-0)409-4-A	01/06/12 08:40	Aqueous	HPLC 5	01/09/12	01/09/12 21:58		120109L02
Parameter	<u>Result</u>	<u>RL</u>	<u>DF</u>	Qual	Parameter			<u>Result</u>	<u>RL</u>	DF	Qual
Naphthalene	ND	1.0	1		Benzo (a) An	thracene		ND	1.0	1	
Acenaphthylene	ND	1.0	1		Chrysene			ND	1.0	1	
Acenaphthene	ND	1.0	1		Benzo (b) Flu	oranthene		ND	1.0	1	
Fluorene	ND	1.0	1		Benzo (k) Flu			ND	1.0	1	
Phenanthrene	ND	1.0	1		Benzo (a) Py			ND	0.20	1	
Anthracene	ND	1.0	1		Dibenz (a,h)			ND	1.0	1	
Fluoranthene	ND	1.0	1		Benzo (g,h,i)			ND	1.0	1	
Pyrene	ND	1.0	1		Indeno (1,2,3			ND	1.0	1	
Surrogates:	<u>REC (%)</u>	Control Limits	Qua	<u>I</u>		-,-, · j				·	
Decafluorobiphenyl	52	16-100									
DUPLICATE			12-01-0)409-5-A	01/06/12 11:30	Aqueous	HPLC 5	01/09/12	120109L02		
Parameter	Result	ы	DF	Qual	Deremeter			Result	RL	DF	Qual
		<u>RL</u>		<u>Qual</u>	Parameter						Quai
Naphthalene	ND	1.0	1		Benzo (a) An	thracene		ND	1.0	1	
Acenaphthylene	ND	1.0	1		Chrysene			ND	1.0	1	
Acenaphthene	ND	1.0	1		Benzo (b) Flu			ND	1.0	1	
Fluorene	ND	1.0	1		Benzo (k) Flu			ND	1.0	1	
Phenanthrene	ND	1.0	1		Benzo (a) Py			ND	0.20	1	
Anthracene	ND	1.0	1		Dibenz (a,h)			ND	1.0	1	
Fluoranthene	ND	1.0	1		Benzo (g,h,i)	•		ND	1.0	1	
Pyrene	ND	1.0	1		Indeno (1,2,3	-c,d) Pyrene		ND	1.0	1	
Surrogates:	<u>REC (%)</u>	<u>Control</u> Limits	<u>Qua</u>	<u>I</u>							
Decafluorobiphenyl	64	16-100									
Method Blank			099-07·	-003-1,820	N/A	Aqueous	HPLC 5	01/09/12		09/12 9:48	120109L02
Parameter	Result	RL	DF	Qual	Parameter			Result	RL	DF	Qual
Naphthalene	ND	1.0	1		Benzo (a) An	thracene		ND	1.0	1	
Acenaphthylene	ND	1.0	1		Chrysene			ND	1.0	1	
Acenaphthene	ND	1.0	1		Benzo (b) Flu	oranthene		ND	1.0	1	
Fluorene	ND	1.0	1		Benzo (k) Flu			ND	1.0	1	
Phenanthrene	ND	1.0	1		Benzo (a) Py			ND	0.20	1	
Anthracene	ND	1.0	1		Dibenz (a,h)			ND	1.0	1	
Fluoranthene	ND	1.0	1		Benzo (g,h,i)			ND	1.0	1	
Pyrene	ND	1.0	1		Indeno (1,2,3			ND	1.0	1	
Surrogates:	<u>REC (%)</u>	<u>Control</u>	' <u>Qua</u>	<u>I</u>		.,.,				•	
		Limits									

RL - Reporting Limit , DF - Dilution Factor , Qual - Qualifiers

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Kiff Analytical 2795 2nd Street, Suite 300 Davis, CA 95616-6593 Date Received:N/AWork Order No:12-01-0409Preparation:EPA 3510CMethod:EPA 8310

Project: Earthgrains Baking Companies, Inc.

Quality Control Sample ID	Matrix	Instrument	Date Prepared)ate alyzed	LCS		
099-07-003-1,820	Aqueous	HPLC 5	01/09/1	2 01/0	9/12	1	20109L02	
Parameter	SPIKE ADDEI	D LCS %REC	LCSD %REC	<u>%REC CL</u>	ME_CL	RPD	RPD CL	Qualifiers
Naphthalene	2.000	86	82	26-170	2-194	5	0-21	
Acenaphthylene	2.000	85	81	49-133	35-147	5	0-23	
Acenaphthene	2.000	79	76	49-133	35-147	5	0-20	
Fluorene	2.000	86	84	56-134	43-147	3	0-17	
Phenanthrene	2.000	89	88	59-131	47-143	2	0-18	
Anthracene	2.000	93	92	58-136	45-149	2	0-19	
Fluoranthene	2.000	92	91	60-132	48-144	1	0-19	
Pyrene	2.000	93	92	65-125	55-135	1	0-21	
Benzo (a) Anthracene	2.000	93	93	65-137	53-149	0	0-21	
Chrysene	2.000	92	92	65-143	52-156	0	0-21	
Benzo (b) Fluoranthene	2.000	93	92	67-139	55-151	0	0-22	
Benzo (k) Fluoranthene	2.000	91	91	68-140	56-152	0	0-22	
Benzo (a) Pyrene	2.000	72	72	62-134	50-146	0	0-22	
Dibenz (a,h) Anthracene	2.000	93	93	66-138	54-150	0	0-28	
Benzo (g,h,i) Perylene	2.000	88	89	66-138	54-150	1	0-21	
Indeno (1,2,3-c,d) Pyrene	2.000	96	97	63-135	51-147	2	0-22	

Total number of LCS compounds : 16 Total number of ME compounds : 0

Total number of ME compounds allowed : 1

LCS ME CL validation result : Pass

n M

RPD - Relative Percent Difference, CL - Control Limit

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Yhn

Glossary of Terms and Qualifiers



Work Order Number: 12-01-0409

Qualifier	Definition
*	See applicable analysis comment.
<	Less than the indicated value.
>	Greater than the indicated value.
1	Surrogate compound recovery was out of control due to a required sample dilution. Therefore, the sample data was reported without further clarification.
2	Surrogate compound recovery was out of control due to matrix interference. The associated method blank surrogate spike compound was in control and, therefore, the sample data was reported without further clarification.
3	Recovery of the Matrix Spike (MS) or Matrix Spike Duplicate (MSD) compound was out of control due to matrix interference. The associated LCS and/or LCSD was in control and, therefore, the sample data was reported without further clarification.
4	The MS/MSD RPD was out of control due to matrix interference. The LCS/LCSD RPD was in control and, therefore, the sample data was reported without further clarification.
5	The PDS/PDSD or PES/PESD associated with this batch of samples was out of control due to a matrix interference effect. The associated batch LCS/LCSD was in control and, hence, the associated sample data was reported without further clarification.
6	Surrogate recovery below the acceptance limit.
7	Surrogate recovery above the acceptance limit.
В	Analyte was present in the associated method blank.
BU	Sample analyzed after holding time expired.
E	Concentration exceeds the calibration range.
ET	Sample was extracted past end of recommended max. holding time.
HD	The chromatographic pattern was inconsistent with the profile of the reference fuel standard.
HDH	The sample chromatographic pattern for TPH matches the chromatographic pattern of the specified standard but heavier hydrocarbons were also present (or detected).
HDL	The sample chromatographic pattern for TPH matches the chromatographic pattern of the specified standard but lighter hydrocarbons were also present (or detected).
J	Analyte was detected at a concentration below the reporting limit and above the laboratory method detection limit. Reported value is estimated.
ME	LCS/LCSD Recovery Percentage is within Marginal Exceedance (ME) Control Limit range.
ND	Parameter not detected at the indicated reporting limit.
Q	Spike recovery and RPD control limits do not apply resulting from the parameter
Q	concentration in the sample exceeding the spike concentration by a factor of four or greater.
SG	The sample extract was subjected to Silica Gel treatment prior to analysis.
X	% Recovery and/or RPD out-of-range.
Z	Analyte presence was not confirmed by second column or GC/MS analysis.
	Solid - Unless otherwise indicated, solid sample data is reported on a wet weight basis, not corrected for % moisture. All QC results are reported on a wet weight basis. MPN - Most Probable Number

KIFF		2		Davi: Lab:	5 Second Street, Suite 300 ris, CA 95618 : 530.297.4800 : 530.297.4808						Gar	den	744 1 Gi	0 L	inc ə. C	A 9	Way													
Project Contact (Hardco						Rep					NO		14- 			194 in-(of_C	net										0 1 0 0	est	
Scott Forbes					' 1	1/ch		lí			NU				711 0		л-0	usi	UUU	y 1 \	500	<i></i>	am	ч Л	mary	y31.	511	Jyu		
Company/Address:		-		Recom	mend	led but	not m	andator	y to com	plete th	ete this section:															Т				
Kiff Analytical				Sam	plin	g Cor	npan	ıy Log	Code	:							Analysis Request TA							. T						
Phone No.:	FAX N			Glob	oal IC	D:		т∩	6001	1773	12				Τ													T		
530-297-4800		297-4808	3																											
Project Number:	P.O. N				eliverables to (Email Address):					s):,																			<u>≥</u>	
120106-WW1 Project Name:		79995								Γ	Matrix															9	s		õ	
Earthgrains Bakin	a Comp	anies Inc	1					reser	vative																	Ĩ	4-Uays		ŝ	
Project Address:	g comp	Samplin		/ None										EPA 8310													4		For Lab Use Only	
														EP/															ц	
Sample				Amber							E			PNAs by																
Designation		Date	Time	1-L							Water			PN/																
MW-101		01/06/12	09:45	2							x			Х												2	x		1	
MW-102		01/06/12	10:30	2							x			X												;	x		2	
MW-103		01/06/12	09:05	2							X			Х												2	x		3	
MW-104		01/06/12	08:40	2							X			Х												,	x		4	
DUPLICATE		01/06/12	11:30	2							X			Х												,	x		5	
	<u> </u>																													
Relindurished by	VACI	1.1-, 1	Date	Tim		Receiv	ed b	y:								R	emark	S:												
HANNA	-11.174	nalytical	010612	1906																										
Relinquished by:		1	Date	Time Received by:																										
Relinquished by:			Date	Time Received by Laboratory:						- (В	ll to:	An	200	ints	: Pa	aval	ble											
01/07/11/1040						2	- CEC								Accounts Payable															







Date Printed 1/6/2012

Shipped From: KIFF ANALYTICAL 2795 2ND STREET 300 DAVIS, CA 95616



Tracking#D10010440620999

Sent By: SAMPLE RECEIVING Phone#: (530)297-4800 wgt(lbs): 1 Reference: SUB SRG SAMPLES Reference 2:

Ship To Company: CALSCIENCE ENVIRONMENTAL	Service: S
7440 LINCOLN WAY GARDEN GROVE, CA 92841	Sort Code: ORG
RECEIVING (714)895-5494	Special Services:
B10207210772	Saturday Delivery Signature Required



		Ø		Page	9 of 9
Environmental	WOI	RK ORDER #:	12-0 ⁻	-04	09
Laboratories, Inc.	PLE REC	EIPT FOR	RM	Cooler _/	of /
CLIENT: KIFF				01/0	
TEMPERATURE: Thermometer ID: SC	3 (Criteria: 0.0 °C	– 6.0 °C, not frozer	ı)		
Temperature/ • 5 °C - 0.3	° C (CF) =	. <u>2</u> °C E	Blank	Sample	
□ Sample(s) outside temperature criteria	a (PM/APM contact	ed by:).			
Sample(s) outside temperature criteria			av of sampl	ina.	
□ Received at ambient temperature,					
Ambient Temperature: Air F	•			Initial:	YL
CUSTODY SEALS INTACT:					
	No (Not Intact)	□ Not Present	□ N/A	Initial	: <u>YC</u>
	No (Not Intact)	☑ Not Present			TN
		Z NOUT resent		mua	·
SAMPLE CONDITION:		· · · · ·	Yes	No	N/A
Chain-Of-Custody (COC) document(s) r	eceived with sam	ples			
COC document(s) received complete			Ø		
□ Collection date/time, matrix, and/or # of co	ntainers logged in ba	sed on sample labels.	•		
□ No analysis requested. □ Not relinquis	shed. 🗌 No date/	ime relinguished.			X
Sampler's name indicated on COC	- k				
Sample container label(s) consistent wit	h COC		Ø		
Sample container(s) intact and good co	ndition				
Proper containers and sufficient volume	for analyses req	uested			
Analyses received within holding time			-		
pH / Res. Chlorine / Diss. Sulfide / Diss.	Oxygen received	d within 24 hours	. 🗆		
Proper preservation noted on COC or s	ample container.		đ		
□ Unpreserved vials received for Volatile	s analysis				
Volatile analysis container(s) free of hea	adspace				
Tedlar bag(s) free of condensation					
Solid:	CGJ □Sleeve (_) □EnCores	s [®] □Terra	Cores [®] □	
Water: UVOA UVOAh UVOAna ₂ U]1AGB s
□500AGB □500AGJ □500AGJs □	250AGB 🗆 2500	CGB □250CGBs	□1PB I	□1PBna □	500PB
□250PB □250PBn □125PB □125P					
Air: □Tedlar [®] □Summa [®] Other: □ Container: C: Clear A: Amber P: Plastic G: Glass Preservative: h: HCL n: HNO ₃ na ₂ :Na ₂ S ₂ O ₃ na: NaO] Trip Bl i J: Jar B: Bottle Z: Zip	ank Lot#: loc/Resealable Bag E: I	Labeled/ Envelope F	Reviewed by:	hisc.

SOP T100_090 (12/06/11)

Return to Contents



Supplemental Report 1

Additional requested analyses are reported as a stand-alone report.

WORK ORDER NUMBER: 12-01-0409

The difference is service



AIR SOIL WATER MARINE CHEMISTRY

Analytical Report For Client: Kiff Analytical Client Project Name: Earthgrains Baking Companies, Inc. Attention: Joel Kiff 2795 2nd Street, Suite 300 Davis, CA 95616-6593

Amande Porter

Approved for release on 01/26/2012 by: Amanda Porter Project Manager



Calscience Environmental Laboratories certifies that the test results provided in this report meet all NELAC requirements for parameters for which accreditation is required or available. Any exceptions to NELAC requirements are noted in the case narrative. The original report of subcontracted analyses, if any, is provided herein, and follows the standard Calscience data package. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety. Note that the Chain-of-Custody Record and Sample Receipt Form are integral parts of this report.



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ResultLink >

Email your PM >



Contents

Client Project Name: Earthgrains Baking Companies, Inc. Work Order Number: 12-01-0409

1	Client Sample Data	
	1.1 Combined Inorganic Tests	3
2	Quality Control Sample Data	
	2.1 MS/MSD and/or Duplicate	4
3	Glossary of Terms and Qualifiers	5
4	Chain of Custody/Sample Receipt Form	6





Kiff Analytical 2795 2nd Street, Suite 300 Davis, CA 95616-6593 Date Received: Work Order No:

Page 1 of 1

Project: Earthgrains Baking Companies, Inc.

Client Sample Number		Lab Sample Number			Date Collected	Matrix		
MW-101			12-01-040)9-1	01/06/12	Aqueous		
<u>Parameter</u>	<u>Results</u>	<u>RL</u>	<u>DF</u>	<u>Qual</u>	<u>Units</u>	<u>Date</u> Prepared	<u>Date</u> Analyzed	Method
Salinity Solids, Total Dissolved	0.96 900	0.10 1.00	1 1		SU mg/L	N/A 01/13/12	01/13/12 01/13/12	SM 2520B SM 2540 C
MW-102			12-01-0409-2		01/06/12	Aqueous		
<u>Parameter</u>	Results	<u>RL</u>	<u>DF</u>	<u>Qual</u>	<u>Units</u>	<u>Date</u> <u>Prepared</u>	<u>Date</u> Analyzed	Method
Salinity	0.94 783	0.10 1.00	1		SU	N/A 01/13/12	01/13/12 01/13/12	SM 2520B SM 2540 C
Solids, Total Dissolved MW-103	765	1.00	1 12-01-0409-3 0		mg/L 01/06/12	Aqueous	01/13/12	SIM 2540 C
						•		
Parameter	<u>Results</u>	<u>RL</u>	<u>DF</u>	<u>Qual</u>	<u>Units</u>	<u>Date</u> Prepared	<u>Date</u> Analyzed	Method
Salinity	0.54	0.10	1		SU	N/A	01/13/12	SM 2520B
Solids, Total Dissolved	450	1.00	1		mg/L	01/13/12	01/13/12	SM 2540 C
MW-104			12-01-040)9-4	01/06/12	Aqueous		
Decemeter	Deculto			Qual	Linita	5.4	-	
<u>Parameter</u>	<u>Results</u>	<u>RL</u>	<u>DF</u>	<u>Qual</u>	<u>Units</u>	<u>Date</u> <u>Prepared</u>	<u>Date</u> Analyzed	Method
Salinity	0.59	0.10	1		SU	N/A	01/13/12	SM 2520B
Solids, Total Dissolved	430	1.00	1		mg/L	01/13/12	01/13/12	SM 2540 C
DUPLICATE			12-01-040)9-5	01/06/12	Aqueous		
Parameter	<u>Results</u>	<u>RL</u>	<u>DF</u>	<u>Qual</u>	<u>Units</u>	<u>Date</u> Prepared	<u>Date</u> Analyzed	Method
Salinity Solids, Total Dissolved	0.94 790	0.10 1.00	1 1		SU mg/L	N/A 01/13/12	01/13/12 01/13/12	SM 2520B SM 2540 C
Method Blank	790	1.00	1		N/A	Aqueous	01/13/12	310 2340 0
Parameter	<u>Results</u>	<u>RL</u>	DF	<u>Qual</u>	<u>Units</u>	<u>Date</u>	Date	Method
Solids, Total Dissolved	ND	1.0	1		mg/L	<u>Prepared</u> 01/13/12	<u>Analyzed</u> 01/13/12	SM 2540 C

RL - Reporting Limit , DF - Dilution Factor , Qual - Qualifiers

Mulhan





Kiff Analytical 2795 2nd Street, Suite 300 Davis, CA 95616-6593 Date Received: Work Order No:

N/A 12-01-0409

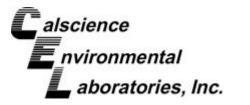
Project: Earthgrains Baking Companies, Inc.

Matrix: Aqueous or Soli	d							
Parameter_	Method	QC Sample ID	Date Analyzed	Sample Conc	DUP Conc	<u>RPD</u>	RPD CL	<u>Qualifiers</u>
Salinity	SM 2520B	MW-101	01/13/12	0.96	0.96	0	0-25	
Solids, Total Dissolved	SM 2540 C	DUPLICATE	01/13/12	790	775	2	0-10	

RPD - Relative Percent Difference, CL - Control Limit

Mulhan

7440 Lincoln Way, Garden Grove, CA 92841-1427 . TEL:(714) 895-5494 . FAX: (714) 894-7501



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Glossary of Terms and Qualifiers



Work Order Number: 12-01-0409

<u>Qualifier</u>	Definition
*	See applicable analysis comment.
<	Less than the indicated value.
>	Greater than the indicated value.
1	Surrogate compound recovery was out of control due to a required sample dilution. Therefore, the sample data was reported without further clarification.
2	Surrogate compound recovery was out of control due to matrix interference. The associated method blank surrogate spike compound was in control and, therefore, the sample data was reported without further clarification.
3	Recovery of the Matrix Spike (MS) or Matrix Spike Duplicate (MSD) compound was out of control due to matrix interference. The associated LCS and/or LCSD was in control and, therefore, the sample data was reported without further clarification.
4	The MS/MSD RPD was out of control due to matrix interference. The LCS/LCSD RPD was in control and, therefore, the sample data was reported without further clarification.
5	The PDS/PDSD or PES/PESD associated with this batch of samples was out of control due to a matrix interference effect. The associated batch LCS/LCSD was in control and, hence, the associated sample data was reported without further clarification.
6	Surrogate recovery below the acceptance limit.
7	Surrogate recovery above the acceptance limit.
В	Analyte was present in the associated method blank.
BU	Sample analyzed after holding time expired.
E	Concentration exceeds the calibration range.
ET	Sample was extracted past end of recommended max. holding time.
HD	The chromatographic pattern was inconsistent with the profile of the reference fuel
	standard.
HDH	The sample chromatographic pattern for TPH matches the chromatographic pattern of
	the specified standard but heavier hydrocarbons were also present (or detected).
HDL	The sample chromatographic pattern for TPH matches the chromatographic pattern of the specified standard but lighter hydrocarbons were also present (or detected).
J	Analyte was detected at a concentration below the reporting limit and above the laboratory method detection limit. Reported value is estimated.
ME	LCS/LCSD Recovery Percentage is within Marginal Exceedance (ME) Control Limit range.
ND	Parameter not detected at the indicated reporting limit.
Q	Spike recovery and RPD control limits do not apply resulting from the parameter concentration in the sample exceeding the spike concentration by a factor of four or
	greater.
SG	The sample extract was subjected to Silica Gel treatment prior to analysis.
X	% Recovery and/or RPD out-of-range.
Z	Analyte presence was not confirmed by second column or GC/MS analysis.
	Solid - Unless otherwise indicated, solid sample data is reported on a wet weight basis, not corrected for % moisture. All QC results are reported on a wet weight basis. MPN - Most Probable Number

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Project Contact (Hardcopy o			E	DF	Re	epo	rt?			N	0			Cha	in-of-(Cust	tod	y Re	cor	d a	nd A	naly				
Scott Forbes						•																				
Company/Address:			L					itory to		te this :	sectio	n:												ТАТ		
Kiff Analytical			Sar	nplir	ng Co	ompa	any L	og Co	de:					Analysis Request												
Phone No.:	FAX No.:		Glo	bal I	D:		Т	060	017	734	2															
530-297-4800	530-297-4808	5	D -1	eliverables to (Email Address):																						
Project Number: 120106-WW1	P.O. No.: 79995			nbox@kiffanalytical.com																			Only			
Project Name:	10000		line and the second sec	Container / Preservative Matrix															Ś			e O				
Earthgrains Baking C	ompanies. Inc																			4-Days			s) (
Project Address:	Samplin		/ None										8310										4-			For Lab Use
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Sample			Amber										by E													_
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MW-102	01/06/12		2		_			+		X			-						_			┼╌┼─	_	+		2
MW-103	01/06/12	09:05	2							X			X			_						\square	X		_	3
MW-104	01/06/12	08:40	2							X			Х										X			4
DUPLICATE	01/06/12	11:30	2							X			Х										Х			5
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01/07/11/0													Accounts Payable													

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WebOnTrac View Shipment





Date Printed 1/6/2012

Shipped From: KIFF ANALYTICAL 2795 2ND STREET 300 DAVIS, CA 95616



Tracking#D10010440620999

Sent By: SAMPLE RECEIVING Phone#: (530)297-4800 wgt(lbs): 1 Reference: SUB SRG SAMPLES Reference 2:

Ship To Company: CALSCIENCE ENVIRONMENTAL	Service: S
7440 LINCOLN WAY GARDEN GROVE, CA 92841	Sort Code: ORG
RECEIVING (714)895-5494	Special Services:
B10207210772	Saturday Delivery Signature Required



Calscience Environmental WORK ORDER #: 12-01-04	19	
Laharatadaa laa		
SAMPLE RECEIPT FORM Cooler / of	; <u> </u>	
CLIENT: <u>KIFF</u> DATE: <u>01/07/1</u>	12	
TEMPERATURE: Thermometer ID: SC3 (Criteria: 0.0 °C – 6.0 °C, not frozen)		
Temperature/_•5°C - 0.3°C (CF) =/ •_2°C ☑ Blank □ Sample		
Sample(s) outside temperature criteria (PM/APM contacted by:).		
□ Sample(s) outside temperature criteria but received on ice/chilled on same day of sampling.		
Received at ambient temperature, placed on ice for transport by Courier.		
Ambient Temperature: \Box Air \Box Filter Initial: $\underline{\gamma}$	L	
CUSTODY SEALS INTACT:	,	
☑ Cooler □ □ No (Not Intact) □ Not Present □ N/A Initial:	' <u> </u>	
□ Sample □ □ No (Not Intact) ☑ Not Present Initial:		
SAMPLE CONDITION: Yes No N/A	A .	
Chain-Of-Custody (COC) document(s) received with samples	J	
COC document(s) received complete	J	
□ Collection date/time, matrix, and/or # of containers logged in based on sample labels.		
☐ No analysis requested. ☐ Not relinquished. ☐ No date/time relinquished.	, ,	
Sampler's name indicated on COC		
Sample container label(s) consistent with COC	I	
Sample container(s) intact and good condition	J	
Proper containers and sufficient volume for analyses requested	J	
Analyses received within holding time		
pH / Res. Chlorine / Diss. Sulfide / Diss. Oxygen received within 24 hours	ſ	
Proper preservation noted on COC or sample container	J	
□ Unpreserved vials received for Volatiles analysis		
Volatile analysis container(s) free of headspace		
Tedlar bag(s) free of condensation □ □ □ CONTAINER TYPE:		
Solid: □4ozCGJ □8ozCGJ □16ozCGJ □Sleeve () □EnCores [®] □TerraCores [®] □		
Water: □VOA □VOAh □VOAna₂ □125AGB □125AGBh □125AGBp ☑1AGB □1AGBna₂ □1AG	GB s	
□500AGB □500AGJ □500AGJs □250AGB □250CGB □250CGBs □1PB □1PBna □500F	ъВ	
□250PB □250PBn □125PB □125PBznna □100PJ □100PJna₂ □ □ □		
Air: □Tedlar [®] □Summa [®] Other: □ Trip Blank Lot#: Labeled/Checked by:		
Container: C: Clear A: Amber P: Plastic G: Glass J: Jar B: Bottle Z: Ziploc/Resealable Bag E: Envelope Reviewed by: 474 Preservative: h: HCL n: HNO ₃ na ₂ :Na ₂ S ₂ O ₃ na: NaOH p: H ₃ PO ₄ s: H ₂ SO ₄ u: Ultra-pure znna: ZnAc ₂ +NaOH f: Filtered Scanned by: W		

Return to Contents