

6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

June 11, 2003

Alameda County
JUN 13 2003
Environmental Health

Reference No. 17366-30

Ms. Donna Drogos
Alameda County Environmental Health
Subsurface Leak Investigation and Cleanup Division
1131 Harbor Bay Parkway
Alameda, California 94502

Dear Ms. Drogos:

Re: Chronology of Events and Investigation Summary
Oil/Water Separator Removal and Replacement
Saturn of Pleasanton
4340 Rosewood Drive
Pleasanton, California 94588

1.0 INTRODUCTION

On behalf of Saturn Corporation Inc. (Saturn), ENCORE Environmental Consortium, L.L.C. (EEC) has prepared this Chronology of Events and Investigation Summary (Summary) prior to the upcoming removal and replacement of an oil/water separator (OWS) at the subject property located at the above-referenced address (Site). This Summary has been prepared per our discussion of the proposed activities at the Site and applicable reporting requirements on June 4, 2003.

2.0 EVENT CHRONOLOGY AND INVESTIGATION SUMMARY

The following documents are enclosed as Attachments A through C which describe all the Site investigation activities conducted by EEC to date, including:

- **Attachment A:** Soil Boring and Monitoring Well Installation letter report to Mr. Wyman Hong with the Alameda County Flood Control and Water Conservation District dated April 8, 2003;
- **Attachment B:** Oil/Water Separator Closure Plan (Plan) letter to Mr. Paul Smith with the Livermore Pleasanton Fire Department (LPFD) dated April 17, 2003;

June 11, 2003

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Reference No. 17366-30

- **Attachment C:** Various Correspondence, including:
 - Response comments from Mr. Paul Smith of the LPFD regarding the Plan referenced above, dated May 22, 2003;
 - EEC Response to LPFD Comments letter dated June 3, 2003;
 - E-mailed correspondence from Mr. Paul Smith of the LPFD to Jeni Quigley of EEC dated June 10, 2003 regarding additional comments to Item D referenced above; and,
 - Addendum to Response to LPFD Comments dated June 11, 2003.

3.0 CLOSURE

EEC anticipates receipt of the permit for the OWS replacement/removal this week and will provide a schedule for the removal activities when available. Please contact the undersigned at (517) 316-2397 with any questions or comments regarding this Summary.

Yours truly,

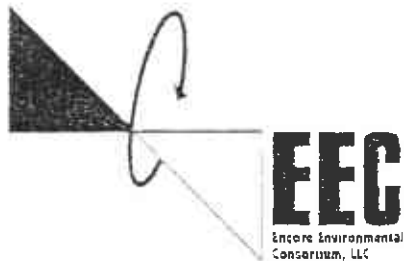

Jennifer L. Quigley, P.E.

BH/1/Det.
Encl.

c.c.: Rob Fogal, Saturn Corporation Inc.
Ben Holly, EEC

ATTACHMENT A

SOIL BORING AND MONITORING WELL INSTALLATION LETTER REPORT



6723 Towpath Road Box 66
Syracuse, NY 13214-0066

April 8, 2003

Reference No. 17366-30

Mr. Wyman Hong
Water Resources Technician II
Alameda County Flood Control and Water Conservation District
5997 Parkside Drive
Pleasanton, California 94588

Dear Mr. Hong:

Re: Drilling Permit No. 22172
Soil Boring and Monitoring Well Installation
Saturn of Pleasanton
Pleasanton, California

1.0 INTRODUCTION

On behalf of Saturn Corporation Inc. (Saturn), ENCORE Environmental Consortium, L.L.C. (EEC) has prepared this summary of field subsurface activities (Summary) conducted in accordance with the requirements of Drilling Permit No. 22172. The subsurface field activities were conducted at the Saturn of Pleasanton properties located at 4340 and 4390 Rosewood Drive (Site) on December 2, 2002.

2.0 SCOPE OF WORK

The Scope of Work (SOW) for the field activities included the installation of 12 soil borings, DP-1 through DP-12. Eleven of the borings were installed on the property at 4340 Rosewood Drive and one soil boring was installed on the property located at 4390 Rosewood Drive. Figure 1 presents the approximate soil boring locations.

2.1 SOIL BORING INSTALLATION

The soil borings were advanced utilizing Geoprobe direct push technology, including a 2-inch diameter 4-foot long macro-core soil sampler containing clear plastic liners. ~~The soil borings were installed to final depths from 12 to 20 feet below ground surface (bgs).~~ Soil samples were collected continuously from the borings. Soil samples were screened using a photoionization detector (PID). The stratigraphy of these borings was logged by a geologist during installation. Stratigraphic soil boring logs are presented in Attachment A.

April 8, 2003

Reference No. 17366-30

2.2 SOIL SAMPLE COLLECTION

Soil samples were collected continuously in 4-foot intervals and screened utilizing a PID. The soil sample exhibiting the highest PID reading, or exhibiting visual or olfactory evidence of impact, the sample from just above the groundwater table, or the soil sample from the total depth (if groundwater or elevated PID readings are not encountered) was submitted for laboratory analysis. A total of 10 soil samples were collected and analyzed for total petroleum hydrocarbons diesel range organics (TPH-DRO) and TPH gasoline range organics (TPH-GRO). Table 1 presents a summary of detected compounds in soil samples. Analytical results are presented in Attachment B.

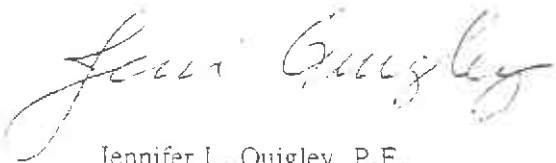
2.3 GROUNDWATER SAMPLE COLLECTION

Groundwater samples were collected from soil borings DP-11 and DP-12 during the subsurface field activities. A total of two groundwater samples were collected and analyzed for TPH-GRO and Target Compound List (TCL) volatile organic compounds (VOCs). Table 2 presents a summary of detected compounds in groundwater samples. Analytical results are presented in Attachment B.

3.0 CLOSURE

Please contact the undersigned at (517) 316-2397 with any questions or comments regarding this Summary.

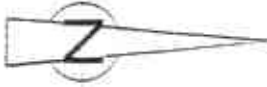
Yours truly,



Jennifer L. Quigley, P.E.

KK/cr/i/Lan.
Encl.

cc: Rob Fogal, Saturn Corporation Inc
Ben Holly, EEC



INTERSTATE 580

SATURN OF PLEASANTON
 4390 ROSEWOOD DRIVE
 PARCEL B

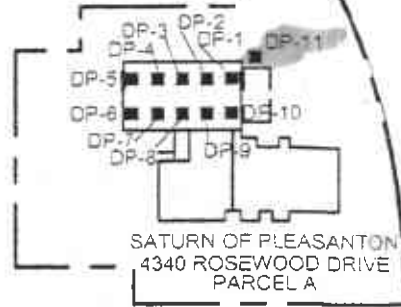
PARCEL C
 1956 OLD SANTA RITA ROAD
 AVIS CAR RENTALS
 SATURN OF PLEASANTON

APARTMENTS
(SINGLE STORY)

PLEASANTON BMW

ROSEWOOD DRIVE

OLD SANTA RITA ROAD



SATURN OF PLEASANTON
 4340 ROSEWOOD DRIVE
 PARCEL A

SHOPPING CENTER

DREXEL HERITAGE

LEGEND

- PROPERTY BOUNDARY
- BUILDING
- DP-1 ■ SOIL BORING LOCATION

SATURN OF PLEASANTON
 PLEASANTON, CALIFORNIA

APPROXIMATE SOIL BORING LOCATIONS

SCALE NOT TO SCALE

MARCH 2000

17366 30(I)ING001IGN DE003 MAR 21/2003

TABLE 1

SUMMARY OF DETECTED COMPOUNDS IN SOIL SAMPLES
SATURN OF PLEASANTON
PLEASANTON, CALIFORNIA

| Sample Location | Total | DP-1 | DP-2 | DP-3 | DP-4 | DP-5 | DP-6 | DP-7 | DP-8 | DP-9 | DP-10 |
|--------------------------|-----------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Sample ID (S-120202-RS-) | Petroleum | 1 | 2 | 3 | 5 | 4 | 6 | 7 | 8 | 10 | 9 |
| Sample Depth (feet bgs) | Hydrocarbon | 11 - 12 | 11 - 12 | 11 - 12 | 11.5 - 12 | 11.5 - 12 | 11.5 - 12 | 11 - 12 | 11 - 12 | 11 - 12 | 11 - 12 |
| Sample Date | Screening | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 | 12/2/02 |
| Units | Levels ⁽¹⁾ | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg |
| Parameter (mg/kg) | | | | | | | | | | | |
| TPH DRO | 100 | ND (13) | ND (13) | ND (12) | ND (12) | ND (12) | ND (13) | ND (12) | ND (12) | ND (13) | ND (11) |
| TPH GRO | 100 | ND (0.13) | ND (0.13) | ND (0.12) | ND (0.12) | ND (0.12) | ND (0.13) | ND (0.12) | ND (0.12) | ND (0.13) | ND (0.11) |

Notes:

⁽¹⁾ California does not have promulgated soil standard for TPH; therefore, criteria is utilized for screening purposes only.

Boxed values indicate an exceedance of the criteria or screening level.

ND - Parameter was not detected at laboratory detection limit identified in parenthesis.

TPH - Total Petroleum Hydrocarbons

DRO - Diesel Range Organics

GRO - Gasoline Range Organics

TABLE 2

SUMMARY OF DETECTED COMPOUNDS IN GROUNDWATER SAMPLES
SATURN OF PLEASANTON
PLEASANTON, CALIFORNIA

| <i>Sample Location</i> | <i>California</i> | <i>Total Petroleum</i> | <i>DP-11</i> | <i>DP-12</i> |
|---------------------------------|-----------------------------|-----------------------------|----------------|----------------|
| <i>Sample ID (W-120202-RS)</i> | <i>Maximum</i> | <i>Hydrocarbon</i> | <i>11</i> | <i>12</i> |
| <i>Sample Depth (feet bgs)</i> | <i>Contaminant</i> | <i>Screening</i> | <i>22-23</i> | <i>30-32</i> |
| <i>Sample Date</i> | <i>Level ⁽¹⁾</i> | <i>Level ⁽²⁾</i> | <i>12/2/02</i> | <i>12/2/02</i> |
| <i>Units</i> | <i>(ug/L)</i> | <i>(ug/L)</i> | <i>(ug/L)</i> | <i>(ug/L)</i> |
| Parameter (ug/L) | | | | |
| <i>TPH-GRO</i> | NC | 1.0 | 330 | ND (100) |
| TCL VOCs | | | | |
| <i>Benzene</i> | 1.0 | NC | 6.3 | ND (1.0) |
| <i>Toluene</i> | 150 | NC | ND (2.0) | ND (1.0) |
| <i>Ethylbenzene</i> | 300 | NC | 5.5 | ND (1.0) |
| <i>Xylenes</i> | 1,750 | NC | 19 | ND (1.0) |
| <i>Methyl tert butyl ether</i> | 13 | NC | 42 | 1.7 |
| <i>1,1-Dichloroethene</i> | 6.0 | NC | 2.5 | NA |
| <i>cis-1,2-Dichloroethene</i> | 6.0 | NC | 17 | NA |
| <i>trans-1,2-Dichloroethene</i> | 10.0 | NC | 8.2 | NA |
| <i>Tetrachloroethene</i> | 5.0 | NC | 2.8 | NA |
| <i>Trichloroethene</i> | 5.0 | NC | 120 | NA |

Notes:

⁽¹⁾ Drinking Water Maximum Contaminant Level from Title 22 California Code of Regulations (CCR) §64431-§64444

⁽²⁾ California does not have promulgated groundwater standard for TPH; therefore, criterion is utilized for screening purposes only.

Boxed values indicate an exceedance of the criteria or screening level.

NC - No standards currently promulgated for this parameter in the State of California.

ND - Parameter was not detected at laboratory detection limit identified in parenthesis.

TPH - Total Petroleum Hydrocarbons

GRO - Gasoline Range Organics

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17326-30
 CLIENT: EEC
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: DF-1
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: B. SIEGFRIED

| DEPTH # SGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft SGS | BOREHOLE INSTALLATION | SAMPLE | | | | |
|----------------|---|-----------------|-----------------------|--------|----------|---------|----------|---------|
| | | | | NUMBER | INTERVAL | REC (%) | UF VALUE | PH (pH) |
| 0 | CONCRETE, gravel base | 1.00 | CONCRETE SEAL | | | | | |
| 2 | MUCL-CLAYEY SILT/SILT CLAY, brn, gray-brown, damp | | BENTONITE CHIPS | 10P | | | | ND |
| 4 | | | | | | | | |
| 6 | | | 2" BOREHOLE | 20P | | | | ND |
| 8 | CL-CLAY stiff brown, moderate plasticity, moist | 7.00 | | | | | | |
| 10 | CH-CLAY very stiff, dark brown, plastic, moist | 10.00 | | 30P | | | | ND |
| 12 | END OF BOREHOLE @ 12.00 SGS | 12.00 | | | | | | |
| 14 | | | | | | | | |
| 16 | | | | | | | | |
| 18 | | | | | | | | |
| 20 | | | | | | | | |
| 22 | | | | | | | | |
| 24 | | | | | | | | |
| 26 | | | | | | | | |
| 28 | | | | | | | | |
| 30 | | | | | | | | |
| 32 | | | | | | | | |
| 34 | | | | | | | | |

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17366-00
 CLIENT: ESD
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: DP-3
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: S. SIEGFRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION | SAMPLE | | | | |
|--|--|---|---|----------------------------------|-------------------------------|-------------------------|-------------------------|-------------------------|
| | | | | NUMBER | INTERVAL | REG. (%) | HF VALUE | PIV (ppm) |
| <div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 10px;">1</div> <div style="margin-bottom: 10px;">2</div> <div style="margin-bottom: 10px;">4</div> <div style="margin-bottom: 10px;">6</div> <div style="margin-bottom: 10px;">8</div> <div style="margin-bottom: 10px;">10</div> <div style="margin-bottom: 10px;">12</div> <div style="margin-bottom: 10px;">14</div> <div style="margin-bottom: 10px;">16</div> <div style="margin-bottom: 10px;">18</div> <div style="margin-bottom: 10px;">20</div> <div style="margin-bottom: 10px;">22</div> <div style="margin-bottom: 10px;">24</div> <div style="margin-bottom: 10px;">26</div> <div style="margin-bottom: 10px;">28</div> <div style="margin-bottom: 10px;">30</div> <div style="margin-bottom: 10px;">32</div> <div style="margin-bottom: 10px;">34</div> <div style="margin-bottom: 10px;">36</div> <div style="margin-bottom: 10px;">38</div> <div style="margin-bottom: 10px;">40</div> </div> | <p>CONCRETE gravel base</p> <hr/> <p>ML-CLAYEY SILT, firm, gray-brown, damp</p> <hr/> <p>CL-CLAY, stiff, moderate plasticity, brown, moist</p> <hr/> <p>CH-CLAY, very stiff, dark brown, plastic, moist</p> <hr/> <p>END OF BOREHOLE @ 12.00 BGS</p> | <p>1.00</p> <p>6.50</p> <p>10.00</p> <p>12.00</p> | <p>CONCRETE SEAL</p> <p>GENTONITE CHIPS</p> <p>BOREHOLE</p> | <p>10P</p> <p>20P</p> <p>30P</p> | <p>NO</p> <p>NO</p> <p>NO</p> | <p></p> <p></p> <p></p> | <p></p> <p></p> <p></p> | <p></p> <p></p> <p></p> |

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE, REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17385-30
 CLIENT: BEC
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: DP-4
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: B. SIEGFRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION | SAMPLES | | | | |
|---|--|--|--|---|----------------------------|----------------------------|----------------------------|----------------------------|
| | | | | NUMBER | INTERVAL | REC. (%) | T ₁₀ VALUE | PIED (mm) |
| 0 2 4 6 8 10 12 14 16 18 20 22 24 26 28 30 32 34 | CONCRETE, gravel base ML-CLAYEY SILT, silty, dark gray-brown, damp-moist GP-SAND, brown, fine grained CL-CLAY, stiff, brown, moderate plasticity, moist CH-CLAY, very stiff, dk brown, plastic, moist END OF BOREHOLE @ 12.04 BGS | 1.00 6.00 6.50 10.00 12.00 | <p style="font-size: small;">CONCRETE SEAL BENTONITE CHIPS 7" BOREHOLE</p> | <div style="border: 1px solid black; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">X</div> <div style="border: 1px solid black; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">X</div> <div style="border: 1px solid black; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">X</div> <div style="border: 1px solid black; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">X</div> <div style="border: 1px solid black; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">X</div> | NO NO NO NO NO | NO NO NO NO NO | NO NO NO NO NO | NO NO NO NO NO |

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

OVERBURDEN LOG CASE 151022 CHL COMP 001 02001

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17355-30
 CLIENT: EEC
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: OP-5
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: B. SIEGFRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION | SAMPLE | | | | |
|-----------------|--|-----------------|--|--------|----------|----------|-----------|-------------|
| | | | | NUMBER | INTERVAL | REC. (%) | "P" VALUE | NO. (P/100) |
| 2 | CONCRETE: gravel base | 1.00 | <p style="font-size: small;">CONCRETE SEAL BENTONITE CHIPS 3" BOREHOLE</p> | 10P | X | | | ND |
| 4 | ML-CLAYEY SILT, soft, dark gray-brown, damp | | | 20P | X | | | ND |
| 6 | SP-SAND, brown, fine grained | 5.50 | | 30P | X | | | ND |
| 8 | CL-CLAY, stiff, moderately plastic, brown, moist | 9.00 | | 40P | X | | | ND |
| 10 | CH-CLAY, very stiff, dark brown, plastic, moist | 10.00 | | 50P | X | | | ND |
| 12 | END OF BOREHOLE @ 12.00 BGS | 12.00 | | | | | | |
| 14 | | | | | | | | |
| 16 | | | | | | | | |
| 18 | | | | | | | | |
| 20 | | | | | | | | |
| 22 | | | | | | | | |
| 24 | | | | | | | | |
| 26 | | | | | | | | |
| 28 | | | | | | | | |
| 30 | | | | | | | | |
| 32 | | | | | | | | |
| 34 | | | | | | | | |

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE, REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

OVERBURDEN LOG 17355-30 OF 1 CHA, AT&TWP PROJ 42013

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17326-30
 CLIENT: EEC
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: DP-5
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: B. SIEGFRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION: | SAMPLES | | | | |
|-----------------|---|-----------------|------------------------|---------|----------|----------|----------|-----------|
| | | | | NUMBER | INTERVAL | REC. (N) | TI VALUE | PI0 (ppm) |
| 0.00 | CONCRETE gravel base | 0.00 | | | | | | |
| 0.00 - 2.00 | CL-SILTY CLAY, firm, dark gray-brown, moist | 2.00 | | 10F | | | | ND |
| 2.00 - 4.00 | | 4.00 | | | | | | |
| 4.00 - 6.00 | | 6.00 | | | | | | |
| 6.00 - 8.00 | SP-SAND brown, fine grained | 8.00 | | 20F | | | | ND |
| 8.00 - 10.00 | CL-CLAY stiff, brown, moderate plasticity moist | 10.00 | | | | | | |
| 10.00 - 12.00 | CH-CLAY, very stiff, dark brown, plastic, moist | 12.00 | | 30F | | | | ND |
| 12.00 | END OF BOREHOLE @ 12.00 BGS | 12.00 | | | | | | |
| 14.00 | | | | | | | | |
| 16.00 | | | | | | | | |
| 18.00 | | | | | | | | |
| 20.00 | | | | | | | | |
| 22.00 | | | | | | | | |
| 24.00 | | | | | | | | |
| 26.00 | | | | | | | | |
| 28.00 | | | | | | | | |
| 30.00 | | | | | | | | |
| 32.00 | | | | | | | | |
| 34.00 | | | | | | | | |

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE, REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

OVERBURDEN LOG (17326-30) DATE: 12/02/02 BY: BJS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17355-30
 CLIENT: EEC
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: CP-7
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: B. SIEGFRIED

| DEPTH (FSGS) | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH (FSGS) | BOREHOLE INSTALLATION | SAMPLE | | | | |
|-----------------|---|-----------------|-----------------------|--------|----------|----------|------------|-----------|
| | | | | NUMBER | INTERVAL | WET. (%) | W.P. VALUE | PHI (ppm) |
| 0 | CONCRETE, grave base | | | | | | | |
| 2 | ML-CLAYEY SILT, firm, gray-brown, damp | 1.00 | CONCRETE SEAL | 10P | X | | | ND |
| 4 | | | BENTONITE CHIPS | | X | | | |
| 6 | ML-SILT, compact, brown, moist | 4.50 | 7" BOREHOLE | 10P | X | | | ND |
| 8 | ML-CLAYEY SILT, stiff, dark brown, moist | 6.70 | | | X | | | |
| 10 | OH-CLAY, very stiff, dark brown-black, plastic, moist | 10.00 | | 10P | X | | | 72 |
| 12 | END OF BOREHOLE @ 12.00 FSGS | 12.00 | | | X | | | |
| 14 | | | | | X | | | |
| 16 | | | | | X | | | |
| 18 | | | | | X | | | |
| 20 | | | | | X | | | |
| 22 | | | | | X | | | |
| 24 | | | | | X | | | |
| 26 | | | | | X | | | |
| 28 | | | | | X | | | |
| 30 | | | | | X | | | |
| 32 | | | | | X | | | |
| 34 | | | | | X | | | |

OVERBURDEN LOG - 17355-AUG-01-CRA-CORP-GD1-4202

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE, REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON
 PROJECT NUMBER: 17366-30
 CLIENT: EEO
 LOCATION: PLEASANTON, CALIFORNIA

HOLE DESIGNATION: DP-8
 DATE COMPLETED: December 2, 2002
 DRILLING METHOD: DIRECT PUSH
 FIELD PERSONNEL: B. SIEGFRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION | SAMPLE | | | | |
|-----------------|--|-----------------|-----------------------|--------|----------|---------|----------------------|------------------------|
| | | | | NUMBER | INTERVAL | PEC (%) | T ₁ VALUE | P ₁₀₀ (ppm) |
| 2 | CONCRETE gravel base | 1.00 | CONCRETE SEAL | | | | | |
| 4 | ML-CLAYEY SILT, firm to stiff, light gray and brown (mottled), damp to moist | | BENTONITE CHIPS | | | | | NO |
| 6 | SP-SAND, med. to coarse, fine grained, wet | 6.00 | 2" BOREHOLE | JDP | | | | 2.5 |
| 6 | CL-CLAY, stiff, dark brown, moderate plasticity, moist | 6.50 | | | | | | |
| 10 | CH-CLAY, very stiff, dark brown-black, plastic, moist | 10.00 | | JDP | | | | 6 |
| 12 | END OF BOREHOLE @ 12.00 BGS | 12.00 | | | | | | |

OVERBURDEN BORE 17366-30 (DP) C.R.A. CONT. GDT 4/2003

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE, REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON

HOLE DESIGNATION: DP-9

PROJECT NUMBER: 17368-90

DATE COMPLETED: December 2, 2002

CLIENT: BEO

DRILLING METHOD: DIRECT PUSH

LOCATION: PLEASANTON, CALIFORNIA

FIELD PERSONNEL: S. SIGGRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION | SAMPLE | | | | | |
|-----------------|--|-----------------|--|--------|----------|----------|----------|-----------|------|
| | | | | NUMBER | INTERVAL | REC. (%) | TC VALUE | PHD (ppm) | |
| 0 | CONCRETE, gravel base | 0.00 | <p>CONCRETE SEAL</p> <p>BENTONITE CHIPS</p> <p>BT BOREHOLE</p> | | | | | | |
| 2 | ML-CLAYEY SILT, firm to stiff, gray-brown, damp to moist | 1.00 | | | | | | | 9.1 |
| 4 | | | | | | | | | |
| 6 | SP-SAND, brown, moist | 6.20 | | | | | | | 15.5 |
| 6.70 | ML-CLAYEY SILT, stiff, moist | 6.70 | | | | | | | |
| 8 | | | | | | | | | |
| 10 | OH-CLAY, very stiff, dark brown-black, plastic, moist | 10.00 | | | | | | | ND |
| 12 | END OF BOREHOLE @ 12.0ft BGS | 12.00 | | | | | | | |
| 14 | | | | | | | | | |
| 16 | | | | | | | | | |
| 18 | | | | | | | | | |
| 20 | | | | | | | | | |
| 22 | | | | | | | | | |
| 24 | | | | | | | | | |
| 26 | | | | | | | | | |
| 28 | | | | | | | | | |
| 30 | | | | | | | | | |
| 32 | | | | | | | | | |
| 34 | | | | | | | | | |

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE, REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

OVERBURDEN LOG 17368 SITE#3 CRA COMP.GDT 4/2/02

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: SATURN OF PLEASANTON

HOLE DESIGNATION: OP-10

PROJECT NUMBER: 17026-00

DATE COMPLETED: December 2, 2002

CLIENT: EEO

DRILLING METHOD: DIRECT PUSH

LOCATION: PLEASANTON, CALIFORNIA

FIELD PERSONNEL: B. SIEGFRIED

| DEPTH ft BGS | STRATIGRAPHIC DESCRIPTION & REMARKS | DEPTH ft BGS | BOREHOLE INSTALLATION | SAMPLE | | | | |
|-----------------|--|-----------------|---|--------|----------|----------|----------|----------|
| | | | | NUMBER | INTERVAL | REC. (%) | TU VALUE | PH (ppm) |
| 0 | CONCRETE gravel base | 0.00 | <p>CONCRETE SEAL</p> <p>BENTONITE CHIPS</p> <p>BOREHOLE</p> | | | | | |
| 1 | ML-CLAYEY SILT, firm to stiff, gray-brown, damp to moist | 1.00 | | 10P | | | | 1.0 |
| 6 | SE-SAND, brown, moist | 6.00 | | 20P | | | | 0.5 |
| 6 | ML-CLAYEY SILT, stiff, moist | 6.50 | | | | | | |
| 10 | CH-CLAY, very stiff, dark brown-black, plastic, moist | 10.00 | | 30P | | | | 7.0 |
| 12 | END OF BOREHOLE @ 12.0ft BGS | 12.00 | | | | | | |
| 14 | | | | | | | | |
| 16 | | | | | | | | |
| 18 | | | | | | | | |
| 20 | | | | | | | | |
| 22 | | | | | | | | |
| 24 | | | | | | | | |
| 26 | | | | | | | | |
| 28 | | | | | | | | |
| 30 | | | | | | | | |
| 32 | | | | | | | | |
| 34 | | | | | | | | |

NOTE: MEASURING POINT ELEVATIONS MAY CHANGE. REFER TO CURRENT ELEVATION TABLE.

CHEMICAL ANALYSIS



STRATIGRAPHIC LOG 17026-00 REF. GRA. C-1001 (301) 12/03

ANALYTICAL REPORT

PROJECT NO. 17365-30

SATURN OF PLEASANTON, CA

Lot #: A2L030139

ORIGINAL ANALYTICAL REPORT

Project#: 17365-30 Lot#: A2L030139

Name: SATURN OF PLEASANTON, CA

SEVERN TRENT LABORATORIES, INC.

Event: PHASE II

Samples: 13 coils, wafers (RS-1 + RS-12)

Analysis: TPH-d, TPH-g, VOC;

Amy L. McCormick

Amy L. McCormick
Project Manager

TAT: 24 HRS (1 DAY)

Lab: STL-NC

Checked Against _____

Date: _____

Date of Val. _____

Invoice At _____

Comments _____

December 19, 2002

Severn Trent Laboratories, Inc.
STL North Canton • 4001 Shuffel Drive NW North Canton, OH 44720
Tel 330 497 9096 Fax 330 497 0772 • www.stl-inc.com

CASE NARRATIVE

A2L030139

The following report contains the analytical results for two water samples, ten solid samples, and one quality control sample submitted to STL North Canton.

from the Saturn of Pleasanton, California Site, project number 17365-30. The samples were received December 3, 2002, according to documented sample acceptance procedures.

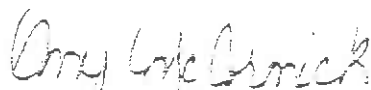
The samples presented in this report were analyzed for the parameters listed on the analytical methods summary page in accordance with the methods indicated. Preliminary results were provided to the Chemistry Department on December 4 and 11, 2002. A summary of QC data for these analyses is included at the rear of the report.

SUPPLEMENTAL QC INFORMATION

SAMPLE RECEIVING

Sample Trip Blank was received at the laboratory but not listed on the chain-of-custody. It was analyzed per the sample label.

STL utilizes USEPA approved methods in all analytical work. The results included in this report have been reviewed for compliance with the laboratory QA/QC plan. All data have been found to be compliant with laboratory protocol.



Amy McCormick
Project Manager

QUALITY CONTROL ELEMENTS OF SW-846 METHODS

STL North Canton conducts a quality assurance/quality control (QA/QC) program designed to provide scientifically valid and legally defensible data. Toward this end, several types of quality control indicators are incorporated into the QA/QC program, which is described in detail in QA Policy, QA-003. These indicators are introduced into the sample testing process to provide a mechanism for the assessment of the analytical data.

QC BATCH

Environmental samples are taken through the testing process in groups called QUALITY CONTROL BATCHES (QC batches). A QC batch contains up to twenty environmental samples of a similar matrix (water, soil) that are processed using the same reagents and standards. STL North Canton requires that each environmental sample be associated with a QC batch.

Several quality control samples are included in each QC batch and are processed identically to the twenty environmental samples. These QC samples include a METHOD BLANK (MB), a LABORATORY CONTROL SAMPLE (LCS) and, where appropriate, a MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) pair or a MATRIX SPIKE/SAMPLE DUPLICATE (MS/DU) pair. If there is insufficient sample to perform an MS/MSD or an MS/DU, then a LABORATORY CONTROL SAMPLE DUPLICATE (LCSD) is included in the QC batch.

LABORATORY CONTROL SAMPLE

The Laboratory Control Sample is a QC sample that is created by adding known concentrations of a full or partial set of target analytes to a matrix similar to that of the environmental samples in the QC batch. The LCS analyte recovery results are used to monitor the analytical process and provide evidence that the laboratory is performing the method within acceptable guidelines. All control analytes indicated by a bold type in the LCS must meet acceptance criteria. Failure to meet the established recovery guidelines requires the reparation and reanalysis of all samples in the QC batch. The only exception is that if the LCS recoveries are biased high and the associated sample is ND (non-detected) for the parameter(s) of interest, the batch is acceptable.

At times, a Laboratory Control Sample Duplicate (LCSD) is also included in the QC batch. An LCSD is a QC sample that is created and handled identically to the LCS. Analyte recovery data from the LCSD is assessed in the same way as that of the LCS. The LCSD recoveries, together with the LCS recoveries, are used to determine the reproducibility (precision) of the analytical system. Precision data are expressed as relative percent differences (RPDs). If the RPD fails for an LCS/LCSD and yet the recoveries are within acceptance criteria, the batch is still acceptable.

METHOD BLANK

The Method Blank is a QC sample consisting of all the reagents used in analyzing the environmental samples contained in the QC batch. Method Blank results are used to determine if interference or contamination in the analytical system could lead to the reporting of false positive data or elevated analyte concentrations. All target analytes must be below the reporting limits (RL) or the associated samples, must be ND except under the following circumstances:

- Common organic contaminants may be present at concentrations up to 5 times the reporting limits. Common metals contaminants may be present at concentrations up to 2 times the reporting limit, or the reported blank concentration must be twenty fold less than the concentration reported in the associated environmental samples. (See common laboratory contaminants listed below.)

| <u>Volatile (GC or GC/MS)</u> | <u>Semivolatile (GC/MS)</u> | <u>Metals</u> |
|-------------------------------|-----------------------------|---------------|
| Methylene chloride | Phthalate Esters | Copper |
| Acetone | | Iron |
| 2-Butanone | | Zinc |
| | | Lead* |

- *for analyses run on TJA Trace ICP, ICPMS or GFAA only*
- Organic blanks will be accepted if compounds detected in the blank are present in the associated samples at levels 10 times the blank level. Inorganic blanks will be accepted if elements detected in the blank are present in the associated samples at 20 times the blank level.

QUALITY CONTROL ELEMENTS OF SW-846 METHODS (Continued)

- Blanks will be accepted if the compounds/elements detected are not present in any of the associated environmental samples.

Failure to meet these Method Blank criteria requires the re-preparation and reanalysis of all samples in the QC batch.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

A Matrix Spike and a Matrix Spike Duplicate are a pair of environmental samples to which known concentrations of a full or partial set of target analytes are added. The MS/MSD results are determined in the same manner as the results of the environmental sample used to prepare the MS/MSD. The analyte recoveries and the relative percent differences (RPDs) of the recoveries are calculated and used to evaluate the effect of the sample matrix on the analytical results. Due to the potential variability of the matrix of each sample, the MS/MSD results may not have an immediate bearing on any samples except the one spiked; therefore, the associated batch MS/MSD may not reflect the same compounds as the samples contained in the analytical report. When these MS/MSD results fail to meet acceptance criteria, the data is evaluated. If the LCS is within acceptance criteria, the batch is considered acceptable. The acceptance criteria do not apply to samples that are diluted for organics if the native sample amount is 4x the concentration of the spike.

For certain methods, a Matrix Spike/Sample Duplicate (MS/DU) may be included in the QC batch in place of the MS/MSD. For the parameters (i.e. pH, ignitability) where it is not possible to prepare a spiked sample, a Sample Duplicate may be included in the QC batch. However, a Sample Duplicate is less likely to provide usable precision statistics depending on the likelihood of finding concentrations below the standard reporting limit. When the Sample Duplicate result fails to meet acceptance criteria, the data is evaluated.

SURROGATE COMPOUNDS

In addition to these batch-related QC indicators, each organic environmental and QC sample is spiked with surrogate compounds. Surrogates are organic chemicals that behave similarly to the analytes of interest and that are rarely present in the environment. Surrogate recoveries are used to monitor the individual performance of a sample in the analytical system.

If surrogate recoveries are biased high in the LCS, LCSD, or the Method Blank, and the associated sample(s) are ND, the batch is acceptable. Otherwise, if the LCS, LCSD, or Method Blank surrogate(s) fail to meet recovery criteria, the entire sample batch is re-prepped and reanalyzed. If the surrogate recoveries are outside criteria for environmental samples, the samples will be re-prepped and reanalyzed unless there is objective evidence of matrix interference or if the sample dilution is greater than the threshold outlined in the associated method SOP.

For the GC/MS BNA methods, the surrogate criterion is that two of the three surrogates for each fraction must meet acceptance criteria. The third surrogate must have a recovery of ten percent or greater.

For the Pesticide, PCB, PAH, and Herbicide methods, the surrogate criterion is that one of two surrogate compounds must meet acceptance criteria.



STL North Canton Certifications and Approvals:

Alabama (#41170), California (#2157), Connecticut (#P4-0590), Florida (#E87225),
Illinois (#100439), Kansas (#E10336), Kentucky (#90021), Massachusetts (#M-QH048),
Maryland (#270), Minnesota (#39-999-348), Missouri (#6090), New Jersey (#74001),
New York (#10975), North Dakota (#R-156), Ohio (#6090), Ohio VAP (#CL0024),
Pennsylvania (#68-340), Rhode Island (#237), South Carolina (#92007001, #92007002, #92007003),
Tennessee (#02903), West Virginia (#210), Wisconsin (#99918190), NAVY, ARMY,
USDA Soil Permit, ACIL Seal of Excellence - Participating Lab Status Award (#82)

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ANALYTICAL METHODS SUMMARY

A2L030139

| <u>PARAMETER</u> | <u>ANALYTICAL METHOD</u> |
|------------------------------------|------------------------------|
| Extractable Petroleum Hydrocarbons | SW846 8015B |
| Total Residue as Percent Solids | MCAWW 160.3 MCD |
| Volatile Petroleum Hydrocarbons | SW846 8015B |
| Volatiles by GC | SW846 8021B |

References:

- MCAWW "Methods for Chemical Analysis of Water and Wastes",
EPA-600/4-79-020, March 1983 and subsequent revisions.
- SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical
Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

A2L030139

| WC # | SAMPLE# | CLIENT | SAMPLE ID | SAMPLED DATE | SAMP TIME |
|-------|---------|----------|------------|--------------|-----------|
| FDSDW | 001 | S-120202 | RS-1 | 12/02/02 | 07:45 |
| FDSEX | 002 | S-120202 | RS-2 | 12/02/02 | 09:00 |
| FDSEL | 003 | S-120202 | RS-3 | 12/02/02 | 09:25 |
| FDSEM | 004 | S-120202 | RS-4 | 12/02/02 | 09:30 |
| FDSEN | 005 | S-120202 | RS-5 | 12/02/02 | 10:15 |
| FDSEP | 006 | S-120202 | RS-6 | 12/02/02 | 10:40 |
| FDSEB | 007 | S-120202 | RS-7 | 12/02/02 | 11:00 |
| FDSET | 008 | S-120202 | RS-8 | 12/02/02 | 11:30 |
| FDSEV | 009 | S-120202 | RS-9 | 12/02/02 | 12:30 |
| FDSEW | 010 | S-120202 | RS-10 | 12/02/02 | 12:45 |
| FDSEX | 011 | W-120202 | RS-11 | 12/02/02 | 13:55 |
| FDSE2 | 012 | W-120202 | RS-12 | 12/02/02 | 14:55 |
| FDSE5 | 013 | | TRIP BLANK | 12/02/02 | |

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

Client Sample ID: S-120202-RS-1

GC Volatiles

Lot-Sample #....: A21030189-001 Work Order #....: F06DWLAD Matrix.....: SO
Date Sampled....: 12/03/02 07:45 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338114
Dilution Factor: 1
% Moisture.....: 21 Method.....: SW845 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|----------------|------------------|--------------|------------|
| TPH (as Gasoline) | ND | LIMIT | ug/kg | 53 |
| | | | | |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| Trifluorotoluene | RECOVERY | LIMITS | | |
| | 105 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-2

GC Volatiles

Lot-Sample #....: AD030139-002 Work Order #....: FDSEK1AD Matrix.....: SO
Date Sampled....: 12/02/02 09:00 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338114
Dilution Factor: 1
% Moisture.....: 23 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> <u>LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------------------------|----------------------------------|--------------|------------|
| TPH (as Gasoline) | ND | 130 | ug/kg | 55 |
| <u>SURROGATE</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RECOVERY</u> <u>LIMITS</u> | | |
| Trifluorotoluene | 108 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-3

GC Volatiles

Lot-Sample #....: A2L030139-003 Work Order #....: F05ELIAD Matrix.....: SO
Date Sampled...: 12/02/02 09:25 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2339114
Dilution Factor: 1
* Moisture.....: 17 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------------------|----------------------------|--------------|------------|
| TPH (as Gasoline) | ND | 120 | ug/kg | 51 |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| Trifluorotoluene | 84 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-4

GC Volatiles

Lot-Sample #...: A2L030139-004 Work Order #...: FDSEMLAD Matrix...: SO
Date Sampled...: 12/02/02 09:30 Date Received...: 12/03/02
Prep Date...: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #...: 2338114
Dilution Factor: 1
* Moisture...: 20 Method...: SWS46 6015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|---------------|------------------|--------------|------------|
| TPH (as Gasoline) | ND | 120 | ug/kg | 52 |

| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> |
|------------------|-----------------|-----------------|
| | <u>RECOVERY</u> | <u>LIMITS</u> |
| Trifluorotoluene | 74 | (10 - 150) |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-5

GC Volatiles

Lot-Sample #....: A21010139-005 Work Order #....: FD5ENLAD Matrix.....: SO
Date Sampled...: 12/02/02 10:15 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338114
Dilution Factor: 1
% Moisture.....: 19 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------|------------------|--------------|------------|
| TPH (as Gasoline) | ND | LIMIT | ug/kg | 52 |
| | | 120 | | |
| <u>SUPROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| Trifluorotoluene | <u>RECOVERY</u> | <u>LIMITS</u> | | |
| | 77 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-6

GC Volatiles

Lot-Sample #....: A21030139-006 Work Order #....: FDSEPLAD Matrix.....: SO
Date Sampled....: 12/02/02 10:40 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338214
Dilution Factor: 1
* Moisture.....: 21 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> <u>LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|---------------|----------------------------------|--------------|------------|
| TPH (as Gasoline) | ND | 130 | ug/kg | 53 |

| <u>SURROGATE</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RECOVERY</u> <u>LIMITS</u> |
|------------------|-----------------------------------|----------------------------------|
| Trifluorotoluene | 71 | (10 - 150) |

NOTE(S):
Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-7

GC Volatiles

Lot-Sample #....: A2L030139-007 Work Order #....: F05E71AD Matrix.....: SC
Date Sampled....: 12/02/02 11:00 Date Received...: 12/02/02
Prep Date.....: 12/01/02 Analysis Date...: 12/03/02
Prep Batch #....: 3338114
Dilution Factor: 1
% Moisture.....: 19 Method.....: SW846 8015B

| PARAMETER | RESULT | REPORTING LIMIT | UNITS | MDL |
|-------------------|---------------------|--------------------|-------|-----|
| TPH (as Gasoline) | ND | 100 | ug/kg | 52 |
| SURROGATE | PERCENT RECOVERY | RECOVERY LIMITS | | |
| Trifluorotoluene | 65 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-8

GC Volatiles

Lot-Sample #....: A2L030139-006 Work Order #....: FDSBT1AD Matrix.....: SO
Date Sampled....: 12/02/02 11:30 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338114
Dilution Factor: 1
% Moisture.....: 19 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> <u>LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------------------------|----------------------------------|--------------|------------|
| TPH (as Gasoline) | ND | 120 | ug/kg | 52 |
| <u>SURROGATE</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RECOVERY</u> <u>LIMITS</u> | | |
| Trifluorotoluene | 78 | (10 - 150) | | |

NOTE (S) :

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-9

GC Volatiles

Lot-Sample #....: A21030139-009 Work Order #....: F05EV1AD Matrix.....: SO
Date Sampled....: 12/02/02 13:30 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2339114
Dilution Factor: 1
% Moisture.....: 21 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|----------------|------------------|--------------|------------|
| TPH (as Gasoline) | ND | 130 | ug/Kg | 53 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| Trifluorotoluene | RECOVERY | LIMITS | | |
| | 65 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-10

GC Volatiles

Lot-Sample #....: A50030239-010 Work Order #....: FDSEWLAD Matrix.....: SO
Date Sampled....: 12/02/02 12:45 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338114
Dilution Factor: 1
% Moisture.....: 12 Method.....: SW846 9015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------------------|----------------------------|--------------|------------|
| TPH (as Gasoline) | ND | 110 | ug/kg | 48 |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| Trifluorotoluene | 66 | (10 - 150) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: W-120202-RS-11

GC Volatiles

Lot-Sample #....: A21030139-011 Work Order #....: FDSEX1AA Matrix.....: WG
Date Sampled....: 12/03/02 13:55 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2336113
Dilution Factor: 1 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------------------|----------------------------|--------------|------------|
| TPH (as Gasoline) | 330 | 100 | ug/L | 46 |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| Trifluorotoluene | 422 * | (10 - 150) | | |

NOTE(S):

- * Surrogate recovery is outside stated control limits.
- Surrogates outside acceptance criteria due to demonstrated matrix effect.

Client Sample ID: W-120202-RS-12

GC Volatiles

Lot-Sample #....: A21030139-812 Work Order #....: FDSE21AA Matrix.....: WG
Date Sampled....: 12/03/02 14:58 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2338112
Dilution Factor: 1 Method.....: SW646 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------|-----------------------------|----------------------------|--------------|------------|
| TPH (as Gasoline) | ND | 100 | ug/L | 46 |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| Trifluorotoluene | 76 | (10 - 150) | | |

Client Sample ID: W-120202-RS-11

GC Volatiles

Lot-Sample #: A2L030139-011 Work Order #: FD5EX1AC Matrix: WG
 Date Sampled: 12/03/02 13:55 Date Received: 12/03/02
 Prep Date: 12/06/02 Analysis Date: 12/06/02
 Prep Batch #: 2343211
 Dilution Factor: 1 Method: SW846 / **5 RUN 8260** **NOT CONFIRM FOR MTBE**

| PARAMETER | RESULT | REPORTING LIMIT | UNITS | MCL |
|---------------------------|--------|-----------------|-------|------|
| Benzene | 6.3 | 2.0 | ug/L | 0.48 |
| Ethylbenzene | 5.5 | 2.0 | ug/L | 0.48 |
| Toluene | ND | 2.0 | ug/L | 0.62 |
| Xylenes (total) | 19 | 2.0 | ug/L | 1.1 |
| Methyl tert-butyl ether | ND | 2.0 | ug/L | 0.26 |
| Acetone | ND | 20 | ug/L | 2.0 |
| Bromodichloromethane | ND | 2.0 | ug/L | 0.32 |
| Bromoform | ND | 2.0 | ug/L | 0.38 |
| Bromomethane | ND | 2.0 | ug/L | 0.20 |
| 2-Butanone | ND | 4.0 | ug/L | 0.58 |
| Carbon disulfide | ND | 20 | ug/L | 4.4 |
| Carbon tetrachloride | ND | 2.0 | ug/L | 0.66 |
| Chlorobenzene | ND | 2.0 | ug/L | 0.28 |
| Dibromochloromethane | ND | 2.0 | ug/L | 0.50 |
| Chloroethane | ND | 2.0 | ug/L | 0.26 |
| Chloroform | ND | 2.0 | ug/L | 0.30 |
| Chloromethane | ND | 2.0 | ug/L | 0.76 |
| 1,2-Dichlorobenzene | ND | 2.0 | ug/L | 0.30 |
| 1,3-Dichlorobenzene | ND | 2.0 | ug/L | 0.34 |
| 1,4-Dichlorobenzene | ND | 2.0 | ug/L | 0.48 |
| Dichlorodifluoromethane | ND | 2.0 | ug/L | 0.38 |
| 1,1-Dichloroethane | ND | 2.0 | ug/L | 0.32 |
| 1,2-Dichloroethane | ND | 2.0 | ug/L | 0.48 |
| 1,1-Dichloroethene | 2.5 | 2.0 | ug/L | 0.38 |
| cis-1,2-Dichloroethene | 1.7 | 2.0 | ug/L | 0.54 |
| trans-1,2-Dichloroethene | 8.2 | 2.0 | ug/L | 0.38 |
| 1,2-Dichloropropane | ND | 2.0 | ug/L | 0.24 |
| cis-1,3-Dichloropropene | ND | 2.0 | ug/L | 0.32 |
| trans-1,3-Dichloropropene | ND | 2.0 | ug/L | 0.28 |
| Trichlorofluoromethane | ND | 2.0 | ug/L | 0.28 |
| 2-Hexanone | ND | 20 | ug/L | 4.0 |
| Isopropylbenzene | ND | 2.0 | ug/L | 0.26 |
| Methylene chloride | ND | 10 | ug/L | 0.26 |
| 4-Methyl-2-pentanone | ND | 4.0 | ug/L | 1.0 |
| Styrene | ND | 2.0 | ug/L | 0.60 |
| 1,1,2,2-Tetrachloroethane | ND | 2.0 | ug/L | 0.76 |
| Tetrachloroethene | 2.8 | 2.0 | ug/L | 0.58 |
| 1,2,4-Trichloro-benzene | ND | 2.0 | ug/L | 0.90 |

(Continued on next page)

Client Sample ID: W-120202-RS-11

GC Volatiles

Lot-Sample #: ARL090199-011 Work Order #: FDSEK1AC Matrix: WG

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|---|-----------------------------|----------------------------|--------------|------------|
| 1,1,1-Trichloroethane | ND | 2.0 | ug/L | 0.32 |
| 1,1,2-Trichloroethane | ND | 2.0 | ug/L | 0.32 |
| Trichloroethene | 120 | 2.0 | ug/L | 0.82 |
| 1,1,2-Trichloro- 1,2,2-trifluoroethane | ND | 2.0 | ug/L | 0.44 |
| Vinyl chloride | ND | 1.0 | ug/L | 1.1 |
| 1,2-Dibromo-3- chloropropane (DBCP) | ND | 2.0 | ug/L | 1.2 |
| 1,2-Dibromoethane (EDB) | ND | 2.0 | ug/L | 0.36 |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| 1,4-Dichlorobutane | 80 | (61 - 140) | | |
| Trifluorotoluene | 108 | (82 - 119) | | |

NOTE(S):

Elevated reporting limits due to matrix interference.

Client Sample ID: W-120202-RS-12

GC Volatiles

Lot-Sample #....: 20030139-012 Work Order #....: F05H11AC Matrix.....: WG
Date Sampled....: 12/02/02 14:35 Date Received...: 12/03/02
Prep Date.....: 12/04/02 Analysis Date...: 12/04/02
Prep Batch #....: 2007079
Dilution Factor: 1 Method.....: SW846 8011B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------------|---------------|----------------------------|--------------|------------|
| Benzene | ND | 1.0 | ug/L | 0.24 |
| Ethylbenzene | ND | 1.0 | ug/L | 0.24 |
| Toluene | ND | 1.0 | ug/L | 0.31 |
| Xylenes (total) | ND | 1.0 | ug/L | 0.57 |
| Methyl tert-butyl ether | 1.7 | 1.0 | ug/L | 0.13 |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|------------------|-----------------------------|----------------------------|
| Trifluorotoluene | 98 | (82 - 119) |

Client Sample ID: TRIP BLANK

GC Volatiles

Lot-Sample #....: ADL030119-013 Work Order #....: FDBES1AA Matrix.....: WQ
Date Sampled....: 12/03/02 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 0339279
Dilution Factor: 1 Method.....: SW846 8021B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|-------------------------|---------------|----------------------------|--------------|------------|
| Benzene | ND | 1.0 | ug/L | 0.24 |
| Ethylbenzene | ND | 1.0 | ug/L | 0.24 |
| Toluene | ND | 1.0 | ug/L | 0.31 |
| Xylenes (total) | ND | 1.0 | ug/L | 0.57 |
| Methyl tert-butyl ether | ND | 1.0 | ug/L | 0.13 |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|------------------|-----------------------------|----------------------------|
| Trifluorotoluene | 97 | (82 - 119) |

Client Sample ID: S-120202-RS-1

GC Semivolatiles

Lot-Sample #....: A21030139-001 Work Order #....: FDSDWLAC Matrix.....: SO
Date Sampled....: 12/02/02 07:45 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2337264
Dilution Factor: 1
% Moisture.....: 21 Method.....: SW845 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> <u>LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|-----------------------------------|----------------------------------|--------------|------------|
| TPH (as Diesel) | ND | 13 | mg/kg | 3.2 |
| <u>SURROGATE</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RECOVERY</u> <u>LIMITS</u> | | |
| C9 (nonane) | 19 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-2

GC Semivolatiles

Lot-Sample #....: A22030139-002 Work Order #....: FDSEKLAB Matrix.....: SO
Date Sampled....: 12/03/02 09:00 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2337254
Dilution Factor: 1
* Moisture.....: 23 Method.....: SW846 9015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> <u>LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|-----------------------------------|----------------------------------|--------------|------------|
| IPH (as Diesel) | ND | 13 | mg/kg | 3.3 |
| <u>SURROGATE</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RECOVERY</u> <u>LIMITS</u> | | |
| C9 (nonane) | 18 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight

Client Sample ID: S-L20202-RS-3

GC Semivolatiles

Lot-Sample #....: A2L030139-003 Work Order #....: FDSELLAC Matrix.....: SO
Date Sampled....: 12/03/02 09:25 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2337264
Dilution Factor: 1
% Moisture.....: 17 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|-----------------------------|----------------------------|--------------|------------|
| TPH (as Diesel) | ND | 12 | mg/kg | 3.0 |
| <u>SUPROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| C9 (nonane) | 13 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-4

GC Semivolatiles

Lot-Sample #....: A21030119-004 Work Order #....: FDSEMLAC Matrix.....: SO
Date Sampled....: 12/03/02 09:50 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 1337064
Dilution Factor: 1
* Moisture.....: 20 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|----------------|------------------|--------------|------------|
| TPH (as Diesel) | ND | 12 | mg/kg | 3.1 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| C9 (nonane) | RECOVERY | LIMITS | | |
| | 18 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-5

GC Semivolatiles

Lot-Sample #....: A11030139-005 Work Order #....: F05ENLAC Matrix.....: SO
Date Sampled...: 12/03/02 10:15 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 1137364
Dilution Factor: 1
* Moisture.....: 19 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|----------------|------------------|--------------|------------|
| TPH (as Diesel) | ND | 12 | mg/kg | 3.1 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| C9 (nonane) | RECOVERY | LEIMITS | | |
| | 13 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-6

GC Semivolatiles

Lot-Sample #....: A01030139-006 Work Order #....: FD55FLAC Matrix.....: SC
Date Sampled....: 12/03/02 10:40 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2337264
Dilution Factor: 10
% Moisture.....: 11 Method.....: SW846 3015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|----------------|------------------|--------------|------------|
| TPH (as Diesel) | ND | 13 | mg/kg | 3.2 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| C9 (nonane) | RECOVERY | LIMITS | | |
| | 17 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-7

GC Semivolatiles

Lot-Sample #....: A2L030139-007 Work Order #....: FDSEPLAC Matrix.....: SO
Date Sampled....: 12/02/02 11:00 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
Prep Batch #....: 2137264
Dilution Factor: 1
* Moisture.....: 19 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MCL</u> |
|------------------|----------------|------------------|--------------|------------|
| TPH (as Diesel) | ND | 12 | mg/kg | 3.1 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| CS (nonane) | 18 | <u>LIMITS</u> | | |
| | | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for 47% wet/dry.

Client Sample ID: S-120202-RS-8

GC Semivolatiles

Lot-Sample #....: A2D0302139-008 Work Order #....: FDSET1AC Matrix.....: SO
Date Sampled....: 12/03/02 11:30 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/04/02
Prep Batch #....: 0337264
Dilution Factor: 1
% Moisture.....: 19 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> <u>LIMIT</u> | <u>UNITS</u> | <u>MCL</u> |
|------------------|-----------------------------------|----------------------------------|--------------|------------|
| TPH (as Diesel) | ND | 12 | mg/kg | 5.0 |
| <u>SURROGATE</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RECOVERY</u> <u>LIMITS</u> | | |
| C9 (nonane) | 19 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-9

GC Semivolatiles

Lot-Sample #....: A11030139-009 Work Order #....: FDSEVLAC Matrix.....: SO
Date Sampled....: 12/03/02 12:30 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/04/02
Prep Batch #....: 0337064
Dilution Factor: 1
* Moisture.....: 01 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|----------------|------------------|--------------|------------|
| TPH (as Diesel) | ND | 13 | mg/kg | 3.2 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| C9 (nonane) | 16 | LIMITS | | |
| | | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

Client Sample ID: S-120202-RS-10

GC Semivolatiles

Lot-Sample #....: AB1030139-010 Work Order #....: FDSEWLAC Matrix.....: SO
Date Sampled....: 12/02/02 12:45 Date Received...: 12/03/02
Prep Date.....: 12/03/02 Analysis Date...: 12/04/02
Prep Batch #....: 2317264
Dilution Factor: 1
% Moisture.....: 11 Method.....: SW846 8015B

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>MDL</u> |
|------------------|----------------|------------------|--------------|------------|
| TPH (as Diesel) | ND | 11 | mg/kg | 2.8 |
| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> | | |
| C9 (nonane) | RECOVERY | LIMITS | | |
| | 16 | (10 - 110) | | |

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

METHOD BLANK REPORT

GC Volatiles

Client Lot # : ASD030139 Work Order # : FD6TV1AA Matrix : WATER
MB Lot-Sample # : ASD040000-112
Analysis Date : 12/03/02 Prep Date : 12/03/02
Dilution Factor : 1 Prep Batch # : 2338112

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING</u> | <u>UNITS</u> | <u>METHOD</u> |
|-------------------|---------------|------------------|--------------|---------------|
| TPH (as Gasoline) | ND | 100 | ug/L | SW646 6015B |

| <u>SURROGATE</u> | <u>PERCENT</u> | <u>RECOVERY</u> |
|------------------|-----------------|-----------------|
| | <u>RECOVERY</u> | <u>LIMITS</u> |
| Trifluorotoluene | 65 | (10 - 150) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results

METHOD BLANK REPORT

GC Volatiles

Client Lot #...: A21030139
MS Lot-Sample #: A21040000-114

Work Order #...: FD6TXLAA

Matrix.....: SOLID

Analysis Date...: 12/03/02
Dilution Factor: 1

Prep Date.....: 12/03/02

Prep Batch #...: 2338114

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>METHOD</u> |
|-------------------|-----------------------------|----------------------------|--------------|---------------|
| TPH (as Gasoline) | ND | 100 | ug/kg | SW846 8015B |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| Trifluorotoluene | 65 | (10 - 150) | | |

NOTE(S):

Calculators are performed before rounding to avoid round-off errors in calculated results

LABORATORY CONTROL SAMPLE DATA REPORT

GC Volatiles

Client Lot #....: A21030139 Work Order #....: FDSTVLAC-LCS Matrix.....: WATER
 LCS Lot-Sample#: A21040000-112 FDSTVLAD-LCSD
 Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
 Prep Batch #....: 2338112
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>SPIKE</u> <u>AMOUNT</u> | <u>MEASURED</u> <u>AMOUNT</u> | <u>UNITS</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RPD</u> | <u>METHOD</u> |
|-------------------|-------------------------------|----------------------------------|--------------|-----------------------------------|------------|----------------------------------|
| TPH (as Gasoline) | 200 | 210 | ug/L | 106 | | SW846 8015B |
| | 200 | 210 | ug/L | 107 | 1.1 | SW846 8015B |
| <u>SURROGATE</u> | | | | <u>PERCENT</u> <u>RECOVERY</u> | | <u>RECOVERY</u> <u>LIMITS</u> |
| Trifluorotoluene | | | | 83 | | (10 - 150) |
| | | | | 81 | | (10 - 150) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Volatiles

Client Lot #...: A2L030139 Work Order #...: FD6TVIAC-LCS Matrix.....: WATER
 LCS Loc-Sample#: A2L0400000-112 FD6TVIAD-LCSD
 Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
 Prep Batch #...: 2338112
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | <u>RPD</u> | <u>RPD LIMITS</u> | <u>METHOD</u> |
|-------------------|-------------------------|------------------------|------------|-------------------|---------------|
| TPH (as Gasoline) | 106 | (75 - 137) | | | SW846 8015B |
| | 107 | (75 - 137) | 1.1 | (0-20) | SW846 8015B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|------------------|-------------------------|------------------------|
| Trifluorotoluene | 83 | (10 - 150) |
| | 81 | (10 - 150) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE DATA REPORT

GC Volatiles

Client Lot #....: A2D030139 Work Order #....: FD6TYLAC-LCS Matrix.....: SOLID
 LCS Lot-Sample#: A11040000-114 FD6TYLAD-LCSD
 Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
 Prep Batch #....: 8308114
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>SPIKE</u> <u>AMOUNT</u> | <u>MEASURED</u> <u>AMOUNT</u> | <u>UNITS</u> | <u>PERCENT</u> <u>RECOVERY</u> | <u>RPD</u> | <u>METHOD</u> |
|-------------------|-------------------------------|----------------------------------|--------------|-----------------------------------|------------|----------------------------------|
| TPH (as Gasoline) | 200 | 210 | ug/kg | 106 | | SW846 8015B |
| | 200 | 210 | ug/kg | 107 | 1.1 | SW846 8015B |
| <u>SURROGATE</u> | | | | <u>PERCENT</u> <u>RECOVERY</u> | | <u>RECOVERY</u> <u>LIMITS</u> |
| Trifluorotoluene | | | | 83 | | (10 - 150) |
| | | | | 81 | | (10 - 150) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Volatiles

Client Lot #...: A22039139 Work Order #...: FD6TX1AC-LCS Matrix.....: SOLID
 LCS Lot-Sample#: A22040000-114 FD6TX1AD-LCSD
 Prep Date.....: 12/03/03 Analysis Date...: 12/03/03
 Prep Batch #...: 2139114
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | <u>RPD</u> | <u>RFD LIMITS</u> | <u>METHOD</u> |
|-------------------|-------------------------|------------------------|------------|-------------------|---------------|
| WPE (as Gasoline) | 106 | (74 - 133) | | | SW846 8015B |
| | 107 | (74 - 133) | 1.1 | (0-23) | SW846 8015B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|------------------|-------------------------|------------------------|
| Trifluorotoluene | 83 | (10 - 150) |
| | 81 | (10 - 150) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

METHOD BLANK REPORT

GC Volatiles

Client Lot # : A2L030139
 MB Lot-Sample #: A2L090000-011
 Analysis Date: 12/06/02
 Dilution Factor: 1

Work Order #: FEFW021A2
 Prep Date: 12/06/02
 Prep Batch #: 0343021

Matrix: WATER

| PARAMETER | RESULT | REPORTING LIMIT | UNITS | METHOD |
|-----------------------------|--------|--------------------|-------|-------------|
| Benzene | ND | 1.0 | ug/L | SW846 8021B |
| Ethylbenzene | ND | 1.0 | ug/L | SW846 8021B |
| Toluene | ND | 1.0 | ug/L | SW846 8021B |
| Xylenes (total) | ND | 1.0 | ug/L | SW846 8021B |
| Methyl tert-butyl ether | ND | 1.0 | ug/L | SW846 8021B |
| Acetone | ND | 10 | ug/L | SW846 8021B |
| Bromodichloromethane | ND | 1.0 | ug/L | SW846 8021B |
| Bromoform | ND | 1.0 | ug/L | SW846 8021B |
| Bromomethane | ND | 1.0 | ug/L | SW846 8021B |
| 2-Butanone | ND | 1.0 | ug/L | SW846 8021B |
| Carbon disulfide | ND | 10 | ug/L | SW846 8021B |
| Carbon tetrachloride | ND | 1.0 | ug/L | SW846 8021B |
| Chlorobenzene | ND | 1.0 | ug/L | SW846 8021B |
| Dibromochloromethane | ND | 1.0 | ug/L | SW846 8021B |
| Chloroethane | ND | 1.0 | ug/L | SW846 8021B |
| Chloroform | ND | 1.0 | ug/L | SW846 8021B |
| Chloromethane | ND | 1.0 | ug/L | SW846 8021B |
| 1,2-Dichlorobenzene | ND | 1.0 | ug/L | SW846 8021B |
| 1,3-Dichlorobenzene | ND | 1.0 | ug/L | SW846 8021B |
| 1,4-Dichlorobenzene | ND | 1.0 | ug/L | SW846 8021B |
| 1,1-Dichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| 1,2-Dichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| 1,1-Dichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| cis-1,2-Dichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| trans-1,2-Dichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| 1,2-Dichloropropane | ND | 1.0 | ug/L | SW846 8021B |
| cis-1,3-Dichloropropene | ND | 1.0 | ug/L | SW846 8021B |
| trans-1,3-Dichloropropene | ND | 1.0 | ug/L | SW846 8021B |
| 2-Hexanone | ND | 10 | ug/L | SW846 8021B |
| Methylene chloride | ND | 5.0 | ug/L | SW846 8021B |
| 4-Methyl-2-pentanone | ND | 1.0 | ug/L | SW846 8021B |
| Styrene | ND | 1.0 | ug/L | SW846 8021B |
| 1,1,2,2-Tetrachloroethane | ND | 1.0 | ug/L | SW846 8021B |
| Tetrachloroethene | ND | 1.0 | ug/L | SW846 8021B |
| 1,2,4-Trichloro- benzene | ND | 1.0 | ug/L | SW846 8021B |
| 1,1,1-Trichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| 1,1,2-Trichloroethane | ND | 1.0 | ug/L | SW846 8021B |
| Trichloroethene | ND | 1.0 | ug/L | SW846 8021B |
| Vinyl chloride | ND | 1.0 | ug/L | SW846 8021B |
| Dichlorodifluoromethane | ND | 1.0 | ug/L | SW846 8021B |

(Continued on next page)

METHOD BLANK REPORT

GC Volatiles

Client Lot #: A2L030139

Work Order #: PEPW01AA

Matrix: WATER

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>METHOD</u> |
|---|---------------|----------------------------|--------------|---------------|
| Trichlorofluoromethane | ND | 1.0 | ug/L | SW846 8021B |
| Isopropylbenzene | ND | 1.0 | ug/L | SW846 8021B |
| 1,1,2-Trichloro- 1,2,2-trifluoroethane | ND | 1.0 | ug/L | SW846 8021B |
| 1,2-Dibromo-3- chloropropane (DBCP) | ND | 1.0 | ug/L | SW846 8021B |
| 1,2-Dibromoethane (ZEB) | ND | 1.0 | ug/L | SW846 8021B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|--------------------|-----------------------------|----------------------------|
| 1,4-Dichlorobutane | 73 | (61 - 140) |
| Trifluorotoluene | 104 | (82 - 119) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results

LABORATORY CONTROL SAMPLE DATA REPORT

GC Volatiles

Client Lot #...: A21030189 Work Order #...: FDSULLAC-LCS Matrix.....: WATER
 LCS Lot-Sample#: A21030000-079 FDSULLAD-LCS
 Prep Date.....: 12/03/02 Analysis Date...: 10/03/02
 Prep Batch #...: 2330279
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>SPIKE AMOUNT</u> | <u>MEASURED AMOUNT</u> | <u>UNITS</u> | <u>PERCENT RECOVERY</u> | <u>RPD</u> | <u>METHOD</u> |
|------------------|---------------------|------------------------|--------------|-------------------------|------------|---------------|
| Toluene | 20 | 20 | ug/L | 99 | | SW846 8021B |
| | 20 | 19 | ug/L | 97 | 2.2 | SW846 8021B |
| Benzene | 20 | 20 | ug/L | 98 | | SW846 8021B |
| | 20 | 19 | ug/L | 96 | 2.0 | SW846 8021B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|------------------|-------------------------|------------------------|
| Trifluorotoluene | 96 | (82 - 119) |
| | 96 | (82 - 119) |

NOTE(S):
 Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Volatiles

Client Lot #....: A2L030138 Work Order #....: FDS111AC-LCS Matrix.....: WATER
 LCS Lot-Sample#: A2L030000-039 FDS111AD-LCSD
 Prep Date.....: 12/03/02 Analysis Date...: 12/03/02
 Prep Batch #....: 2337278
 Dilution Factor: 1

| PARAMETER | PERCENT | RECOVERY | RPD | RPD | METHOD |
|-----------|----------|------------|--------|--------|-------------|
| | RECOVERY | LIMITS | LIMITS | LIMITS | |
| Toluene | 99 | (79 - 118) | | | SW846 8021B |
| | 97 | (79 - 118) | 2.2 | (0-20) | SW846 8021B |
| Benzene | 98 | (77 - 118) | | | SW846 8021B |
| | 96 | (77 - 118) | 2.0 | (0-20) | SW846 8021B |

| SURROGATE | PERCENT | RECOVERY |
|------------------|----------|------------|
| | RECOVERY | LIMITS |
| Trifluorotoluene | 96 | (82 - 119) |
| | 96 | (82 - 119) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

LABORATORY CONTROL SAMPLE DATA REPORT

GC Volatiles

Client Lot #....: A22030133 Work Order #....: PEPW01AC-LCS Matrix.....: WATER
 LCS Lot-Sample#: A2L090000-111 PEPW01AD-LCSD
 Prep Date.....: 12/06/02 Analysis Date...: 12/06/02
 Prep Batch #....: 2343211
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>SPIKE AMOUNT</u> | <u>MEASURED AMOUNT</u> | <u>UNITS</u> | <u>PERCENT RECOVERY</u> | <u>RPD</u> | <u>METHOD</u> |
|--------------------|---------------------|------------------------|--------------|-------------------------|------------|---------------|
| Toluene | 20 | 22 | ug/L | 109 | | SW846 8021B |
| | 20 | 21 | ug/L | 106 | 2.3 | SW846 8021B |
| Benzene | 20 | 21 | ug/L | 106 | | SW846 8021B |
| | 20 | 21 | ug/L | 103 | 2.2 | SW846 8021B |
| 1,1-Dichloroethene | 20 | 21 | ug/L | 106 | | SW846 8021B |
| | 20 | 20 | ug/L | 101 | 4.6 | SW846 8021B |
| Trichloroethene | 20 | 22 | ug/L | 110 | | SW846 8021B |
| | 20 | 21 | ug/L | 107 | 3.2 | SW846 8021B |
| Chlorobenzene | 20 | 22 | ug/L | 109 | | SW846 8021B |
| | 20 | 22 | ug/L | 108 | 1.5 | SW846 8021B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|--------------------|-------------------------|------------------------|
| 1,4-Dichlorobutane | 99 | (61 - 140) |
| | 97 | (61 - 140) |
| Trifluorotoluene | 108 | (82 - 119) |
| | 109 | (82 - 119) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Volatiles

Client Lot #....: A2L030139 Work Order #....: PEFW01AD-LCS Matrix.....: WATER
 LCS Lot-Sample#: A2L030000-311 PEFW01AD-LCSD
 Prep Date.....: 12/06/02 Analysis Date...: 12/06/02
 Prep Batch #....: 2343111
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | <u>RPD</u> | <u>RPD LIMITS</u> | <u>METHOD</u> |
|--------------------|-------------------------|------------------------|------------|-------------------|---------------|
| Toluene | 109 | (79 - 118) | | | SW846 8021B |
| | 106 | (79 - 118) | 2.3 | (0-20) | SW846 8021B |
| Benzene | 106 | (77 - 118) | | | SW846 8021B |
| | 102 | (77 - 118) | 2.2 | (0-20) | SW846 8021B |
| 1,1-Dichloroethene | 106 | (72 - 127) | | | SW846 8021B |
| | 101 | (72 - 127) | 4.6 | (0-20) | SW846 8021B |
| Trichloroethene | 110 | (82 - 117) | | | SW846 8021B |
| | 107 | (82 - 117) | 3.2 | (0-20) | SW846 8021B |
| Chlorobenzene | 109 | (83 - 118) | | | SW846 8021B |
| | 108 | (83 - 118) | 1.5 | (0-20) | SW846 8021B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|--------------------|-------------------------|------------------------|
| 1,4-Dichlorobutane | 99 | (61 - 140) |
| | 97 | (61 - 140) |
| Trifluorotoluene | 108 | (82 - 119) |
| | 109 | (82 - 119) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #....: A2L030139
M2 Lot-Sample #: A2L030000-064
Analysis Date...: 12/04/02
Dilution Factor: 1

Work Order #....: FDSFRLAA
Prep Date.....: 12/03/02
Prep Batch #....: 2337264

Matrix.....: SOLID

| <u>PARAMETER</u> | <u>RESULT</u> | <u>REPORTING LIMIT</u> | <u>UNITS</u> | <u>METHOD</u> |
|------------------|-----------------------------|----------------------------|--------------|---------------|
| TPH (as Diesel) | ND | 10 | mg/kg | SW846 8015B |
| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | | |
| C9 (nonane) | 10 | (10 - 110) | | |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE DATA REPORT

GC Semivolatiles

Client Lot #...: A2L030139 Work Order #...: FDSFRLAC-LCS Matrix.....: SOLID
 LCS Lot-Sample#: A2L030000-264 FDSFRLAD-LCSD
 Prep Date.....: 12/03/00 Analysis Date...: 12/04/00
 Prep Batch #...: 2337264
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>SPIKE</u> | <u>MEASURED</u> | <u>UNITS</u> | <u>PERCENT</u> | <u>RPD</u> | <u>METHOD</u> |
|------------------|---------------|-----------------|--------------|-----------------|------------|-----------------|
| | <u>AMOUNT</u> | <u>AMOUNT</u> | | <u>RECOVERY</u> | | |
| TPH (as Diesel) | 17 | 13 | mg/kg | 78 | | SW846 8015B |
| | 17 | 13 | mg/kg | 75 | 4.5 | SW846 8015B |
| <u>SUPROGATE</u> | | | | <u>PERCENT</u> | | <u>RECOVERY</u> |
| | | | | <u>RECOVERY</u> | | <u>LIMITS</u> |
| C9 (nonane) | | | | 27 | | (10 - 110) |
| | | | | 11 | | (10 - 110) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: A22030119 Work Order #...: FDSFR1AC-LCS Matrix: ~~UNKNOWN~~ SOLID
 LCS Lot-Sample#: A22030000-264 FDSFR1AD-LCSD
 Prep Date...: 12/03/02 Analysis Date...: 12/04/02
 Prep Batch #...: 2227264
 Dilution Factor: 1

| <u>PARAMETER</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> | <u>RPD</u> | <u>RPD LIMITS</u> | <u>METHOD</u> |
|------------------|-------------------------|------------------------|------------|-------------------|---------------|
| TRE (as Diesel) | 78 | (37 - 153) | | | SW846 8015B |
| | 75 | (37 - 153) | 4.5 | (0-98) | SW846 8015B |

| <u>SURROGATE</u> | <u>PERCENT RECOVERY</u> | <u>RECOVERY LIMITS</u> |
|------------------|-------------------------|------------------------|
| C9 (nonane) | 27 | (10 - 110) |
| | 11 | (10 - 110) |

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

CHAIN OF CUSTODY RECORD

SHIPPED TO (Laboratory Name):

SFL

REFERENCE NUMBER:

17365-30

| SAMPLER'S SIGNATURE: <i>Robert T. Siegfried</i> | | PRINTED NAME: <i>Bob Siegfried</i> | | SAMPLE TYPE | No. of Containers | PARAMETERS | | REMARKS |
|---|------|------------------------------------|------------------|-------------|-------------------|------------|------|-------------------------|
| SFO No. | DATE | TIME | SAMPLE No. | | | PH-A | PH-9 | |
| | 12-2 | 0945 | 5-120202 - RS-1 | Soil | 4 | X | X | 24 Hr Turn Around time. |
| | | 0900 | - RS-2 | | 4 | X | X | |
| | | 0925 | - RS-3 | | 4 | X | X | |
| | | 0930 | - RS-4 | | 4 | X | X | |
| | | 1015 | - RS-5 | | 4 | X | X | |
| | | 1040 | - RS-6 | | 4 | X | X | |
| | | 1100 | - RS-7 | | 4 | X | X | |
| | | 1130 | - RS-8 | | 4 | X | X | |
| | | 1230 | - RS-9 | | 4 | X | X | |
| | | 1245 | - RS-10 | | 4 | X | X | |
| | | 1355 | W-120202 - RS-11 | | 6 | X | X | |
| | | 1455 | W-120202 - RS-12 | | 6 | X | X | |
| END | | | | | | | | |

TOTAL NUMBER OF CONTAINERS

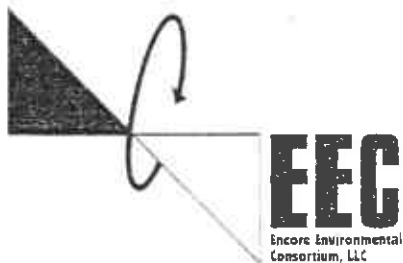
HEALTH/CHEMICAL HAZARDS

| | | | |
|--|---|-------------------------|----------------------------|
| RELINQUISHED BY: ① <i>Robert T. Siegfried</i> | DATE: <i>12-2-02</i> TIME: <i>1530</i> | RECEIVED BY: ① _____ | DATE: _____ TIME: _____ |
| RELINQUISHED BY: ② _____ | DATE: _____ TIME: _____ | RECEIVED BY: ② _____ | DATE: _____ TIME: _____ |
| RELINQUISHED BY: ③ _____ | DATE: _____ TIME: _____ | RECEIVED BY: ③ _____ | DATE: _____ TIME: _____ |

| | |
|--|---|
| METHOD OF SHIPMENT | WAY BILL No. |
| White - Fully Executed Copy Yellow - Receiving Laboratory Copy Pink - Shipper Copy Goldenrod - Sampler Copy | RECEIVED FOR LABORATORY BY: NO. CRA 12014 DATE: <i>12-3-02</i> TIME: <i>1000</i> |

1004 (13) AFD 20/97 (11) (REV. 01-15)

ATTACHMENT B
OIL/WATER SEPARATOR CLOSURE PLAN



6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

April 17, 2003

Reference No. 17366-30

Ms. Danielle Stefani
Hazardous Materials Coordinator
Livermore - Pleasanton Fire Department
3560 Nevada Street
Pleasanton, California 94566

Dear Ms. Stefani:

Re: Oil/Water Separator Closure Plan
Saturn of Pleasanton
4340 Rosewood Drive
Pleasanton, California

1.0 INTRODUCTION

On behalf of Saturn Corporation Inc. (Saturn), ENCORE Environmental Consortium, L.L.C. (EEC) has prepared this Closure Plan (Plan) for the removal and replacement of an oil/water separator (OWS) at the subject property located at the above-referenced address (Site). This Plan has been prepared in accordance with the permit requirements provided to EEC by the Livermore - Pleasanton Fire Department (LPFD) and the sampling requirements presented in the Tri-Regional Board Guidelines (TRBG) dated August 10, 1990. A permit application associated with this Plan is enclosed.

2.0 BACKGROUND

In 1999, McLaren/Hart, Inc. (MH) conducted a subsurface Site investigation adjacent to the existing OWS, which identified that total petroleum hydrocarbon - gasoline range organics (TPH-GRO) and total petroleum hydrocarbon - diesel range organics (TPH-DRO) were not detected in soil above a reporting limit of 50 parts per million at an approximate depth of 8 to 10 feet.

Of the volatile organic compounds (VOCs) detected in soil adjacent to the existing OWS, only benzene, at a concentration of 2,000 micrograms per kilogram (ug/kg), exceeded the applicable EPA Region 9 Preliminary Remediation Goals (PRG). Groundwater was not encountered during the 1999 MH investigation.

On December 2, 2002, EEC investigated the subsurface conditions adjacent to the existing OWS. EEC installed soil boring DP-11 adjacent to the existing OWS and collected one groundwater sample for analysis of TPH-GRO and VOCs. TPH-GRO was detected at a concentration of 330 micrograms per liter (ug/l). VOCs detected above the applicable California Maximum Contaminant Levels (MCLs) and their respective concentrations include: benzene (6.3 ug/l), cis-1,2-dichloroethene (17 ug/l), and trichloroethene (120 ug/l). EEC encountered groundwater in soil boring DP-11 at an approximate depth of 26 feet below grade.

3.0 SCOPE OF WORK

EEC has contracted Marcor Remediation, Inc., (MARCOR) of San Leandro, California to complete the removal and replacement of one approximately 2,500-gallon OWS located at the Site. Photographic documentation of the OWS removal and replacement will be conducted. Figure 1 presents the location of the existing OWS unit. The existing OWS unit will be removed in accordance with all applicable permit requirements and replaced with a Jensen® precast model JZ2500ECE-CL 2,500-gallon OWS unit. A cut sheet for the new OWS unit is attached as Attachment A.

3.1 SOIL SAMPLE LOCATIONS AND ANALYSIS

With the assistance of MARCOR, EEC will collect one soil sample from each sidewall of the OWS excavation and two floor soil samples from either end of the OWS excavation. If groundwater is encountered in the excavation, EEC will collect a groundwater sample, in lieu of floor samples, in accordance with applicable TRBG requirements.

Based on the results of the previous investigations and the TRBG requirements, EEC will analyze the soil and/or groundwater samples obtained from the OWS excavation for VOCs using USEPA method 8260B, TPH-GRO using USEPA method 8015B, and TPH-DRO using USEPA method 8015B.

In the event that any of the OWS excavation sidewall or bottom samples contain detected VOCs exceeding applicable regulatory criteria or TPH at a concentration of 100 milligrams per kilogram (mg/kg) or greater, EEC will direct MARCOR to remove additional soil from the excavation until no visual or olfactory evidence of impact is observed by EEC. Following the removal of additional soil, a second round of sidewall and bottom samples will be collected from the OWS excavation for the above analytical parameters.

Because non-fuel constituents have been detected in groundwater beneath the existing OWS, EEC will conduct a preliminary Site-specific subsurface investigation according to the requirements of the TRBG with the concurrence of the Regional Water Quality Control Board (RWQCB). Currently, EEC intends to delineate the horizontal extent of VOCs in groundwater through the installation of two soil borings in each direction surrounding the location of the OWS for a total of eight

April 17, 2003

3

Reference No. 17366-30

delineation soil borings. Groundwater samples will be collected from each soil boring and analyzed for VOCs as a screening method. After the removal and replacement of the OWS, based on the results of the subsurface investigation, EEC plans to install three monitoring wells for continued groundwater monitoring and determination of the groundwater flow direction.

3.2 OWS CONTENTS

The contents of the existing OWS consists of non-saritary wastewater generated by Site activities. The contents of the existing OWS will be properly characterized by EEC and containerized by MARCOR for off-Site disposal or treatment at an approved facility.

4.0 CLOSURE

Please contact the undersigned at (517) 316-2397 with any questions or comments regarding this Plan.

Yours truly,



Jennifer L. Quigley, P.E.

BH/1/Det.
Encl.

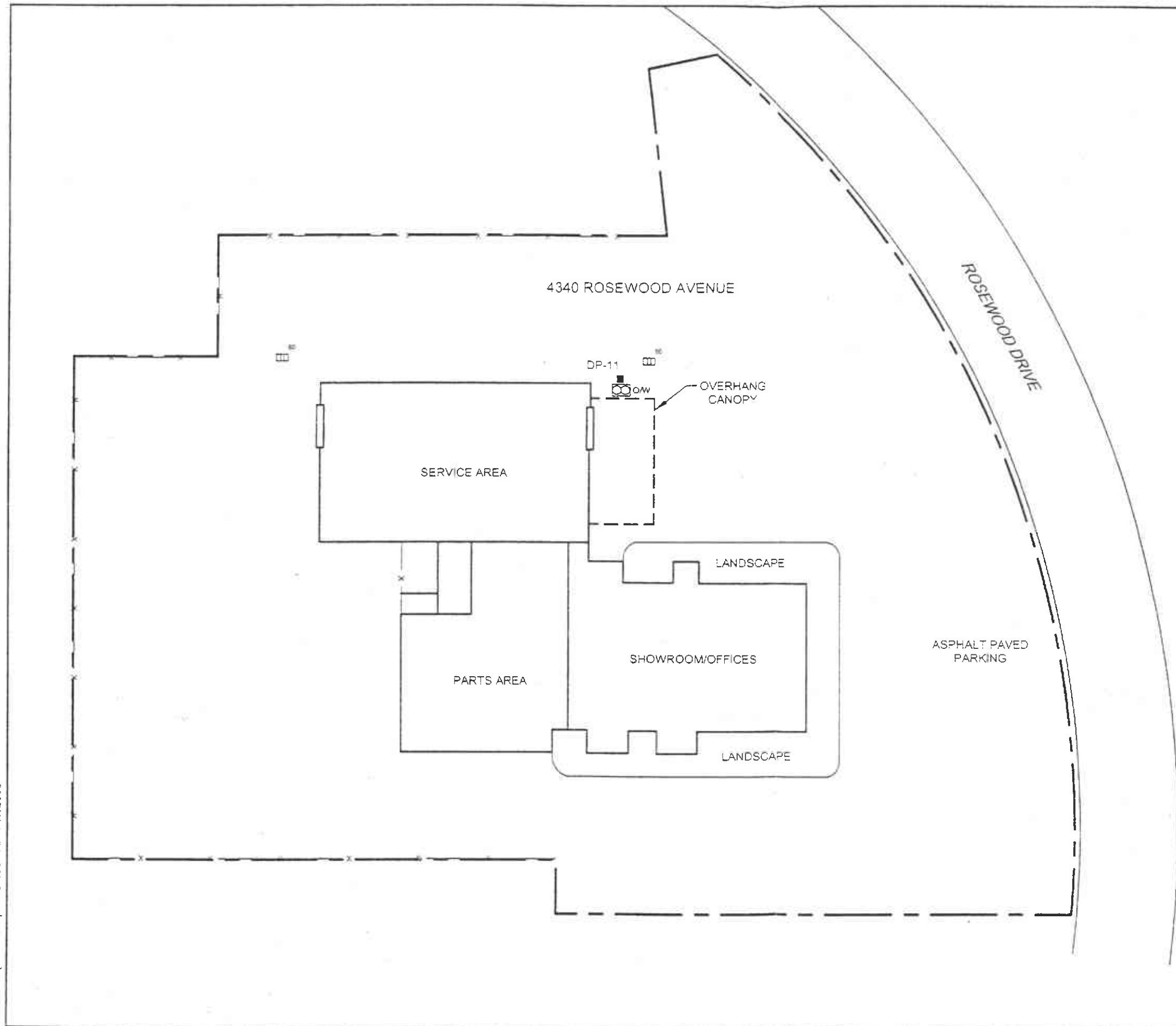
c.c.: Rob Fogal, Saturn Corporation Inc.
Ben Holly, EEC



NOT TO SCALE

LEGEND

-  PROPERTY BOUNDARY
-  FENCE
-  STORM DRAIN
-  OIL/WATER SEPARATOR
-  OVERHEAD DOOR
-  EEC SOIL BORING LOCATION



17366-30(STEF001)GN-DE001 APR 17/2003

SATURN OF PLEASANTON
PLEASANTON, CALIFORNIA

SITE PLAN

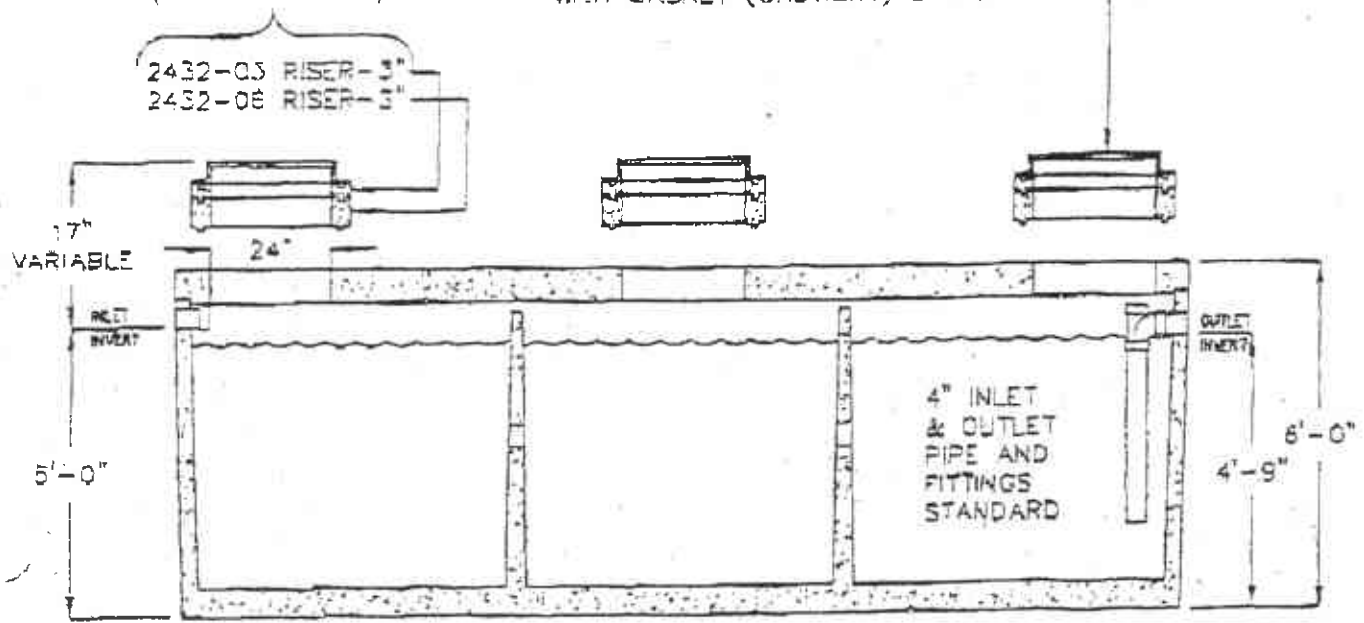
APRIL 2003
FIGURE 1

2500 GALLON CLARIFIER MODEL JZ2500ECE-CL

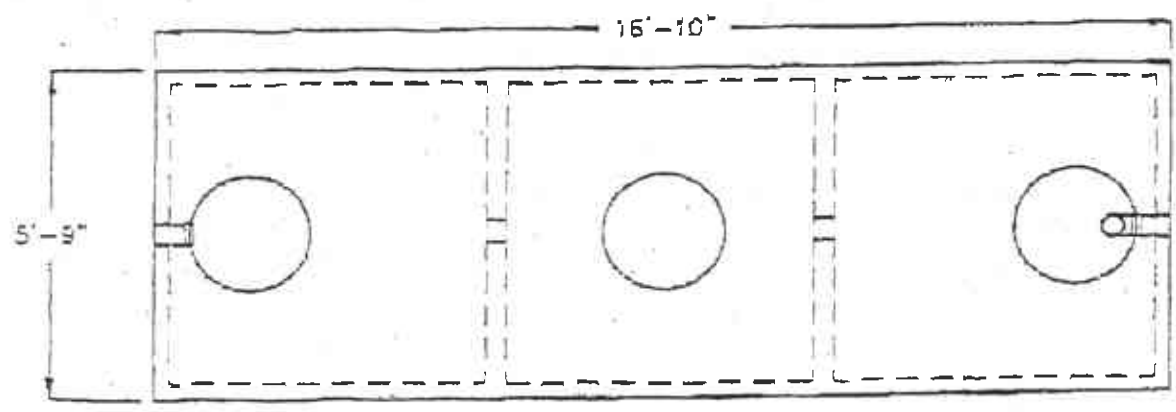
AS REQUIRED
(AT EXTRA COST)

24" CAST IRON FRAME & COVER
WITH GASKET (GASTIGHT) STANDARD.

2432-03 RISER-3"
2432-08 RISER-3"



SIDE VIEW (CUT AWAY)



TOP VIEW
(COVERS & RISERS REMOVED)

LIQUID CAPACITY: 2,500 GALLONS.
 BOX DESIGN LOAD: H-20 TRAFFIC FROM
 1' TO 5' OF SOIL COVER.
 FOR COMPLETE DESIGN AND PRODUCT
 INFORMATION CONTACT JENSEN PRECAST.

2/16/06

ATTACHMENT C
VARIOUS CORRESPONDENCE

May 22, 2003

reviewed by Paul Smith, Livermore Pleasanton Fire Dept. (LPFD)
3560 Nevada St., Pleasanton, CA 94566
(925) 454-2339, fax (925) 454-2339

Comments on Removal/Replacement of Oil Water Separator, Saturn of Pleasanton, 4340
Rosewood Dr., Pleasanton, CA 94588

Building Department Permit # COPC 200022

Here are comments/ requests I will share with the contractor Marcor Remediation, Inc re the
above project.

1. Need to submit a \$200 plan check and inspection fee through COP Building Department for LPFD oversight of this project prior to issuance of the permit.
2. Please confirm that the current and proposed sumps connect to sanitary sewer, not the storm system.
3. Based on levels of contaminants found in a subsurface samples of:

- Soil taken in 2000 adjacent to the sump indicated 2,000 ug/kg benzene
- Water sample taken in 12/2/2002 indicated: 6.3 ug/l benzene, 17 ug/l dichlorobenzene and 120 ug/l trichloroethene at a depth of 26 feet

Based on the above data and on any further subsurface information ECC is proposing to install three ground water monitoring wells around the sump area. Please notify Alameda County Environmental Health, Local Oversight Program as soon as possible to provide them with all relevant information regarding previous contamination or cleanup objectives for this site. This will allow them to witness potential contamination and cleanup actions taken when the sump removal occurs. Please direct all correspondence and questions to: Donna Drogos, Ala. Co. Env. Health, Subsurface Leak Investigation and Cleanup Division, 1131 Harbor Bay Parkway, Alameda, CA 94502. Please contact Donna with any questions at 510 567-6721.

4. The Sampling plan dated April 17, 2003 prepared by Encore Environmental Consortium (EEC) states that one soil sample from each sidewall of the oil water separator excavation and two floor samples from either end of the separator excavation. If groundwater is encountered in the excavation EEC will collect a ground water sample, in lieu of floor samples, in accordance with applicable Tri Regional Board Guidelines Requirements. I am requesting that whether or not water is encountered that soil samples as indicated above be collected from the oil water separator pit. Based on contaminants identified above I anticipate that perched water may be encountered associated with a leaking sump might be present in the excavation pit.
5. I checked with Dublin San Ramon Services District regarding any permit conditions they may have regarding discharge into their sanitary sewer system. They do not require a permit for installation of discharge for this type of system. Allowable effluent discharge limitations are currently: 150 mg/l hydrocarbons/ Total Oil and Grease as Motor Oil/Grease and 200 mg/l hydrocarbons Total Oil and Grease as Vegetable Oil/Grease. Housekeeping of service bays flowing into the trench drains must be sufficient to minimize waste oil from flowing into the trench/and sump system. Housekeeping at the Saturn Service Center and a proper maintenance frequency of the sump must be sufficient to allow the sump to meet the above numerical discharge limitations.



6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

June 3, 2003

Reference No. 17366-30

Mr. Paul Smith
Livermore - Pleasanton Fire Department
3560 Nevada Street
Pleasanton, California 94566

Dear Mr. Smith:

Re: Response to Livermore - Pleasanton Fire Department's Comments
Oil/Water Separator Closure Plan
Saturn of Pleasanton
4340 Rosewood Drive
Pleasanton, California

This letter, prepared on behalf of Saturn Corporation Inc. (Saturn), presents ENCORE Environmental Consortium, L.L.C.'s (EEC) response (Response) to the Livermore - Pleasanton Fire Department's (LPFD) comments (Comments) on the Oil/Water Separator Closure Plan (Closure Plan) for the Saturn of Pleasanton site located at 4340 Rosewood Drive in Pleasanton, California (Site), dated May 22, 2003.

The Closure Plan describes the activities that will be conducted during the removal and replacement of an oil/water separator (OWS) at the Site, and was submitted as a portion of an application for Building Department No. COPC 200022. This Response letter, and any other correspondence necessary, will serve as an addendum to the Closure Plan.

Each comment in the letter from LPFD to Marcor, and to EEC therefrom, dated May 22, 2003, is presented below followed by a response to that specific comment.

Comment:

1. *Need to submit a \$200 plan check and inspection fee through COP Building Department for LPFD oversight of this project prior to issuance of the permit.*

Response:

1. The plan check and inspection fees for the LPFD oversight will be submitted by MARCOR to the COP Building Department prior to initiation of the project.

Comment:

2. *Please confirm that the current and proposed sumps connect to the sanitary sewer, not the storm system.*

Response:

2. MARCOR spoke with Mr. Alfredo Vazquez of the City of Pleasanton Building Department (PBD) on May 28, 2003 regarding the existing connection of the OWS. Mr. Vazquez provided correspondence from Mr. Abbas Masjedi, Utility Engineer with the PBD. According to Mr. Masjedi, PBD records indicate that the OWS discharge is connected to the sanitary sewer system.

Comment:

3. *Based on levels of contaminants found in subsurface samples of:*
 - *Soil taken in 2000 adjacent to the sump indicated 2,000 ug/kg benzene*
 - *Water sample taken in 12/2/02 indicated: 6.3 ug/l benzene, 17 ug/l dichlorobenzene and 120 ug/l trichloroethene at a depth of 26 feet*

Based on the above data and on any further subsurface information ECC is proposing to install three ground water monitoring wells around the sump area. Please notify Alameda County Environmental Health, Local Oversight Program as soon as possible to provide them with all relevant information regarding previous contamination or cleanup objectives for this site. This will allow them to witness potential contamination and cleanup actions taken when the sump removal occurs. Please direct all correspondence and questions to: Donna Drogos, Ala. Co. Env. Health, Subsurface Leak Investigation and Cleanup Division, 1131 Harbor Bay Parkway, Alameda, CA 94502. Please contact Donna with any questions at 510 567-6721.

Response:

3. A letter identifying the scope of work and previous analytical results will be prepared and submitted to the Alameda County Environmental Health, Subsurface Leak Investigation, and Cleanup Division (ACHD). Notification will be conducted directly with the ADHD, in accordance with local regulatory requirements.

Comment:

4. *The Sampling plan dated April 17, 2003 prepared by Encore Environmental Consortium (EEC) states that one soil sample from each sidewall of the oil water separator excavation and two floor samples from either end of the separator excavation. If groundwater is encountered in the excavation EEC will collect a ground water sample, in lieu of floor samples, in accordance with applicable Tri Regional Board Guidelines Requirements. I am requesting that whether or not water is encountered that soil samples as indicated above be collected from the oil water separator pit. Based on contaminants identified above I anticipate that perched water may be encountered associated with a leaking sump might be present in the excavation pit.*

Response:

4. Previous Site investigations that have been conducted indicated that benzene was identified in a soil sample collected adjacent to the OWS at a concentration above the applicable cleanup criteria (the United States Environmental Protection Agency (U.S. EPA) Region 9 Preliminary Remediation Goal (PRG)), as presented in Comment No. 3. Based on the analytical results and the proximity of the OWS to the location of the soil sample, it was identified that the source of the soil impact was the OWS. In addition, as presented in Comment No. 3, several volatile organic compounds have been identified in groundwater at concentrations above the California Maximum Contaminant Levels (MCLs). This indicates that the soil surrounding the OWS has been impacted and has impacted the groundwater, at depth. If groundwater is encountered in the excavation, it can be assumed that groundwater is the transport media for the contamination at that depth; therefore, the focus of the sample collection for representative identification of contamination should be groundwater and not soil. Soil sample collection below the water table is not representative of soil conditions at that depth, rather, it is representative of the groundwater. Soil samples will not be collected from the excavation floor if groundwater is present. *not perched water*

Comment:

5. *I checked with Dublin San Ramon Services District regarding any permit conditions they may have regarding discharge into their sanitary sewer system. They do not require a permit for installation of discharge for this type of system. Allowable effluent discharge limitations are currently: 150 mg/l hydrocarbons/ Total Oil and Grease as Motor Oil/Grease and 200 mg/l hydrocarbons Total Oil and Grease as Vegetable Oil/Grease. Housekeeping of service bays flowing into the trench drains must be sufficient to minimize waste oil from flowing into the trench/and sump system. Housekeeping at the Saturn Service Center and a proper maintenance frequency of the sump must be sufficient to allow the sump to meet the above numerical discharge limitations.*

June 3, 2003

4

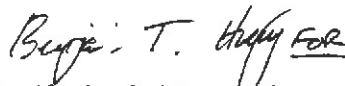
Reference No. 17366-30

Response:

5. EEC will notify the Site of these discharge requirements. No discharge to the sanitary sewer system will occur during the removal and replacement of the OWS.

Should you have any questions or comments regarding this Response, please contact the undersigned at (517) 316-2397.

Yours truly,



Jennifer L. Quigley, P.E.

BH/1/Det.
Encl.

c.c.: Rob Fogal, Saturn Corporation Inc.
Ben Holly, EEC

-----Original Message-----

From: Smith, Paul [mailto:PSmith@lpfire.org]

Sent: Tuesday, June 10, 2003 5:51 PM

To: Jennifer Quigley (E-mail)

Cc: Donna Drogos (E-mail); Ron Imperiale (E-mail)

Subject: Comments dated June 3, 2003 re Sump removal/replacement, Saturn of Pleasanton, 4340 Rosewood Dr., Pleasanton,

Hi Jennifer,

This note follows up on our phone conversation today concerning your response to the plan check comments I sent out on the above project on May 22, 2003.

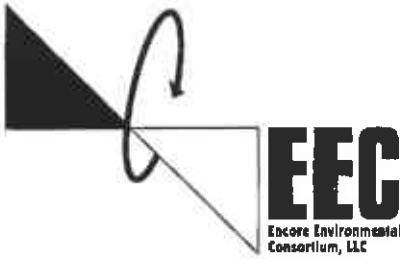
Plan approval is contingent on implementation of each of the following:

In item 4 of your June 2, 2003 response you mentioned that when collecting samples of soil in the sump excavation if water (either perched or groundwater) was encountered you would collect a water sample only. After conferring with Alameda County Environmental Health Department, Local Oversight Program involved in performing regulatory oversight of any site mitigation necessary, if any, we both agree that whether or not water is encountered in the sump excavation pit that soil samples shall be taken. If water is present a water sample will also be collected and analyzed for all of the appropriate parameters.

Regarding submission of a plan check/inspection fee for oversight of the plan check and removal and installation a deposit of \$200 must be submitted prior to issuance of an approved permit. Please be advised that the oversight is billed out at the rate of \$ 100/hour. Any time exceeding 2 hours spent on this project will be billed to you at the completion of this project. Please submit this amount through the City of Pleasanton Building Department for project CHPC T200017.

Once the above issues have been completed and a valid permit has been obtained please contact me, or have your removal installation contractor contact me at (925) 454-2339. Please feel free to contact me if you have any questions regarding the above.

Thank you.



6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

June 11, 2003

Reference No. 17366-30
Privileged and Confidential
Prepared at the Request of Counsel

Mr. Paul Smith
Livermore - Pleasanton Fire Department
3560 Nevada Street
Pleasanton, California 94566

Dear Mr. Smith:

Re: Addendum to Response to Livermore - Pleasanton Fire Department's Comments
Oil/Water Separator Closure Plan
Saturn of Pleasanton
4340 Rosewood Drive
Pleasanton, California

This letter, prepared on behalf of Saturn Corporation Inc. (Saturn), presents ENCORE Environmental Consortium, L.L.C.'s (EEC) addendum (Addendum) to the response (Response) to the Livermore - Pleasanton Fire Department's (LFPD) comments (Comments) on the Oil/Water Separator Closure Plan (Closure Plan) for the Saturn of Pleasanton site located at 4340 Rosewood Drive in Pleasanton, California (Site). The Comments, dated May 22, 2003, were addressed in a letter from EEC dated June 3, 2003.

The Closure Plan describes the activities that will be conducted during the removal and replacement of an oil/water separator (OWS) at the Site, and was submitted as a portion of an application for Building Department Permit No. COPC 200022 (Permit). This Addendum letter, and any other correspondence necessary, will serve as an addendum to the Closure Plan.

Based on subsequent discussions between EEC and the LFPD and an email sent June 10, 2003, it was identified that EEC's response to Comment No. 4, presented in the June 3, 2003 letter, was unacceptable to the LFPD. In addition, it was identified that the payment for oversight of the OWS removal by the LFPD was required to be paid prior to issuance of the Permit. The comments from this email, and EEC's responses therefrom, are presented below.

June 11, 2003

2

Reference No. 17366-30
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Prepared at the Request of Counsel

Comment:

1. *In item 4 of your June 2, 2003 response you mentioned that when collecting samples of soil in the sump excavation if water (either perched or groundwater) was encountered you would collect a water sample only. After conferring with Alameda County Environmental Health Department, Local Oversight Program involved in performing regulatory oversight of any site mitigation necessary, if any, we both agree that whether or not water is encountered in the sump excavation pit that soil samples shall be taken. If water is present a water sample will also be collected and analyzed for all of the appropriate parameters.*

Response:

1. A minimum of two soil samples will be collected from the OWS excavation floor for analysis for the same analytical parameters as the sidewall samples, as presented in the Closure Plan. In addition, if groundwater is encountered in the OWS excavation, EEC will collect a groundwater sample for analysis for the same analytical parameters as the soil samples.

Comment:

2. *Regarding submission of a plan check/inspection fee for oversight of the plan check and removal and installation a deposit of \$200 must be submitted prior to issuance of an approved permit. Please be advised that the oversight is billed out at the rate of \$ 100/hour. Any time exceeding 2 hours spent on this project will be billed to you at the completion of this project. Please submit this amount through the City of Pleasanton Building Department for project CHPC T200017.*
2. It is understood that the issuance of the Permit is contingent upon the submittal of the required oversight fee deposit of \$200 to the City of Pleasanton Building Department. This fee will be paid by our subcontractor, MARCOR Remediation, Incorporated during the application process and will reference project CHPC T200017.

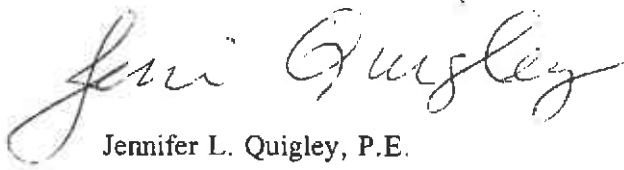
June 11, 2003

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Reference No. 17366-30
Privileged and Confidential
Prepared at the Request of Counsel

Should you have any questions or comments regarding this Addendum, please contact the undersigned at (517) 316-2397.

Yours truly,



Jennifer L. Quigley, P.E.

JQ/1/Lan.
Encl.

c.c.: Rob Fogal, Saturn Corporation Inc.
Ben Holly, EEC