

December 17, 2004

Mr. Robert Schultz
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Shell-branded Service Station
8999 San Ramon Road
Dublin, California

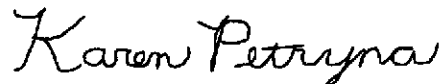
Dear Mr. Schultz:

Attached for your review and comment is a copy of the *Agency Response* for the above referenced site. Upon information and belief, I declare, under penalty of perjury, that the information contained in the attached document is true and correct.

As always, please feel free to contact me directly at (559) 645-9306 with any questions or concerns.

Sincerely,

Shell Oil Products US



Karen Petryna
Sr. Environmental Engineer

December 17, 2004

Mr. Robert Schultz
Alameda County Health Care Services Agency
Environmental Health Services- Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **Agency Response**
Shell-branded Service Station
8999 San Ramon Road
Dublin, California
SAP Code 135244
Cambria Project #246-0724-006



Dear Mr. Schultz:

Cambria Environmental Technology, Inc. (Cambria) prepared this letter on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to respond to portions of the November 3, 2004 *Workplan Request* letter from Alameda County Health Care Services Agency (ACHCSA) to Shell. In addition, this letter makes a minor, yet important correction to Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report*. Cambria's response below primarily addresses Technical Comment #1 "Compliance with 23 CCR Article 5." Shell has also retained Delta Environmental Consultants, Inc. (Delta) of San Jose, California as primary consultant for work on this project. Under separate cover, Delta responds to Technical Comments 2, 3 and 4 and provides a work plan for additional site investigation.

CORRECTION TO PRIOR REPORT

Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report* contained an error on page 2 in the "Piping Samples" paragraph. Cambria's original report misidentified the sample location near which free product was observed beneath the geotextile fabric. The correct location was near sample location P-6-5.0, at the northeastern-most corner of the original fuel piping layout. As a result of this finding, Cambria directed the resultant over-excavation in the adjacent area on August 27, 2004. ACHCSA personnel observed both the discovery of free-product and over-excavation of impacted soils in this area, so Cambria believes ACHCSA understood the correct location. However, to correct the written report, Cambria wishes to make this clarification.

**Cambria
Environmental
Technology, Inc.**

5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

At no time did Cambria observe free product near sample location P-1-5.0 or in the vicinity of piping or trenches near the underground storage tanks (UST0. Cambria regrets this error.

RESPONSE TO AGENCY TECHNICAL COMMENT #1

The ACHCSA November 3, 2004 letter's Technical Comment #1, "Compliance with 23 CCR Article 5" reads as follows:



Shell detected a gasoline and diesel release beneath the product dispensers on July 30, 2004, and submitted an unauthorized release form (URF) dated August 3, 2004. 23 CCR Section 2652(c) requires i) a description of the corrective actions which were undertaken and will be conducted, ii) proposed cleanup actions, and iii) a time schedule for implementation. The URF indicates that the proposed cleanup method was "other" with no further elaboration. Shell provided no time schedule for implementation of the proposed action, as required by Section 2652(c) (8). Further, 23 CCR Sections 2653(a)(5) and 2654(b)(1 and 2) require that owners and operators investigate to determine the possible presence of free product and that they promptly gather information about the site and the nature of the release. Shell appears to have failed to comply with these requirements.


On August 25, 2004, Shell detected free product within a piping trench and submitted a second URF for the site on August 26, 2004. Shell proposed cleanup via over-excavation, coordinated the cleanup action with ACEH (ACHCSA Environmental Health Services) and performed initial work on August 27, 2004. 23 CCR sections 2652 through 2655 outline the reporting (,) investigation, initial response, initial abatement, initial characterization and free product removal requirements in response to this release. Sections 2652 (c) (7 and 8) and 2653 (a) (5) require specific investigation and reporting tasks within 5 days of detecting an unauthorized release. Shell did not inspect the tank backfill wells for free product until October 4, 2004. 23 CCR section 2652 (c) (7 and 8) required that you propose: 1) corrective actions, and 2) a time schedule for implementation. Contrary to these requirements, the October 13, 2004 report states:

"[Shell's consultant] (Cambria) will not prepare a workplan until after receipt of comments on this report."

23 CCR Article 5 outlines the requirements of owners and operators and we request that you comply with its provisions with or without additional directive from ACEH. We encourage you to be proactive in response to discovery of unauthorized releases.

We request that you report all items (1 through 7) required under 23 CCR 2655(e). We request that you include documentation of the total volume of free product recovered, including copies of waste manifests. Please submit this information in the workplan requested below.

Cambria addresses each section of this Technical Comment in order, below.



Shell detected a gasoline and diesel release beneath the product dispensers on July 30, 2004, and submitted an unauthorized release form (URF) dated August 3, 2004: Cambria collected soil samples beneath seven dispenser locations on July 30, 2004 under ACHCSA inspector Robert Weston's oversight. The samples were submitted for laboratory analysis under 24-hour turnaround time, requested as indicated on the chain of custody form. Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report* did not include a copy of the laboratory report for the July 30, 2004 samples; however, a copy is included as Attachment A. The results were reported to Cambria on August 2, 2004, and Cambria contacted Robert Weston of the ACHCSA's Certified Unified Program Agency (CUPA) division on August 3, 2004 by telephone. The Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report (URF) was submitted to ACHCSA on August 5 by fax and by mail.

The data obtained from the results of the July 30, 2004 sampling indicated that gasoline, MTBE and diesel fuel constituents were present in soil samples. Based on this discovery of these hazardous substances in the soils near the dispensers, Cambria and Shell believed that this constituted "detection" of a "condition", rather than a "release," requiring reporting under of 23 CCR Section 2650 (e)(2); therefore, Cambria submitted the URF in accordance with 23 CCR 2652 (b). Cambria and Shell inferred that a fuel "release" (per 23 CCR 2650) which caused the observed conditions was likely to have occurred at some prior time, although no direct "release" of fuel product (per the California Health and Safety Code section 25281 (p) definition) was observed:

"Release" means any spilling, leaking, emitting, discharging, escaping, leaching, or disposing from an underground storage tank into or on the waters of the state, the land, or the subsurface soils.

To clarify, Cambria did not observe any spilling, leaking, emitting, discharging, escaping, leaching, or disposing from UST into or on the waters of the state, the land, or the subsurface soils on July 30, 2004.

23 CCR Section 2652(c) requires i) a description of the corrective actions which were undertaken and will be conducted, ii) proposed cleanup actions, and iii) a time schedule for implementation. The URF indicates that the proposed cleanup method was "other" with no further elaboration. Shell provided no time schedule for implementation of the proposed

action, as required by Section 2652(c) (8): At the time of the August 3, 2004 URF submittal, Cambria and Shell were not aware of the existence of free product at the site. Also, no corrective actions had yet been undertaken since the release had just been discovered, and no cleanup actions were yet proposed. However, Cambria and Shell implicitly understood that the discovery of the condition which indicated a prior release would likely trigger opening of a leaking underground fuel tank (LUFT) case, and that ACHCSA could require additional site characterization or cleanup actions. However, at the time of the August 3, 2004 URF submittal, no specific remedial action could be recommended or planned; thus Shell and Cambria believe that Shell's indication of "other" as the "remedial action" on the URF was appropriate.



At the time, Cambria and Shell believed that the appropriate notification within 24 hours of detection was made, and that submittal of the URF constituted sufficient reporting pursuant to 23 CCR Section 2652 of a "full written report" within 5 working days. As of 5 days after discovery of the condition, no additional information was available, no plans for additional investigation or cleanup work had been made, and no schedule for additional work had been made, so the URF reported completely all required items under 23 CCR Section 2652 to the extent possible.

Further, 23 CCR Sections 2653(a)(5) and 2654(b)(1 and 2) require that owners and operators investigate to determine the possible presence of free product and that they promptly gather information about the site and the nature of the release. Shell appears to have failed to comply with these requirements: For clarification, at the time of the first dispenser soil sampling event on July 30, 2004, field observations did not indicate the existence of free product. Also, upon receipt of the analytical results from the July 30, 2004 sampling event, there was no reason to take immediate action based on the chemical concentrations reported.

Subsequently, when additional soil sampling was performed as a result of a request for sampling due to piping upgrades and Cambria returned to the site to conduct the additional soil sampling on August 25, 2004, Cambria discovered the existence of apparent free product in the presence of Robert Weston of ACHCSA's CUPA division. Therefore, ACHSA was notified immediately in the field of the free product's existence and of the newly identified area of impacted soil, which was distinct from those areas discovered during the July 30 sampling. On the afternoon of August 25, 2004, Cambria notified Shell of the finding and developed an initial, informal plan for rapid response. Cambria also directed Shell's contractor to collect as much product as possible. This was done by placing a bucket into the trench where soil sample P-6-5.0 was collected. Cambria clarified with Mr. Weston on August 26, 2004 that another URF should be filed on behalf of Shell as a result of the discovery; Cambria submitted Shell's URF dated August 25, 2004 to Mr. Weston by e-mail on August 26, 2004 at 2:29 pm, according to Cambria's records.

On August 26, at Shell's request, Cambria coordinated a plan for over-excavation and investigation on August 27, 2004 with Shell, Shell's contractor Wayne Perry Construction, Inc. (Wayne Perry), and Robert Schultz of ACHCSA. As previously reported, soils in an area near the free product discovery location were excavated in the presence of and under the oversight of Mr. Schultz on August 27, 2004. As previously reported, soil samples were collected at the excavation extents to confirm the residual soil concentrations. No free product was observed in the excavated area. An undetermined volume of liquid, assumed to be free product with unknown water content (which was later estimated at four gallons for waste disposal) was collected in the bucket placed in the ground, and the bucket was removed from the ground and was stored appropriately in a drum. Mr. Schultz left the site at 10:30 am according to Cambria's records.



Following Mr. Schultz' departure from the site on August 27, to further characterize the extent of free product-impacted soils, Cambria directed Wayne Perry to remove additional pea gravel and geo-textile fabric in the area of the northern and eastern fuel piping runs, west of and south of the P-6-5.0 sample location. During pea gravel and fabric removal activities, no free-flowing product was observed. However, staining and odors were observed in soil that appeared to be damp to moist with product located just beneath the geo-textile lining, between the native soil and pea gravel backfill. As previously reported, additional soil samples were collected for analysis.

Based on the observations and prior analytical results, at the request of Shell and ACHSA, Cambria re-mobilized to the site on September 2, 2004. Before beginning the additional excavation, on-site utilities were identified on September 2, 2004 with the assistance of Cruz Brothers Locators, Inc., a private utility line locator. Under Cambria oversight, Wayne Perry used a backhoe to over-excavate the existing product trenches and dispenser locations. Prior to soil excavation, all remaining pea gravel and geo-textile were removed from all piping trenches. The trenches were widened to between 3 and 4 feet horizontally and deepened 1 to 2 feet vertically in some locations. Cambria directed Wayne Perry to over-excavate a 10 x 10 x 5-foot area in the vicinity of the southeastern-most dispenser (D-7). The area excavated was limited both horizontally and vertically due to the presence of subsurface utility conduits, as identified by the private utility line locator, and by the utility lines exposed by the backhoe. As previously reported, Cambria field staff collected excavation confirmation samples from the excavation base and sidewalls. Heavy odors and staining were observed during excavation activities.

Due to a change in schedule, the excavation work was conducted prior to Mr. Schultz' arrival on site. However, Cambria field staff and Mr. Schultz reviewed the sample locations over the telephone both prior to and following his visit to the site.

After review of the additional data and at Mr. Schultz' request, Cambria collected additional sidewall confirmation samples on September 7, 2004. The sample locations were selected to be

above the observed clay layer in areas where impacted soil appeared to remain in the sidewall. The samples were collected in native soil using a slide hammer after digging into the sidewall approximately 1 to 2 feet to expose "fresh" soil.

In Cambria's opinion, the amount and rapidity of investigation and remediation of the identified impacted soils was extraordinarily prompt. Within eight days of discovery of free product, fuel-impacted soils were significantly investigated and remediated by excavation and all potential immediate hazards were mitigated. Within 13 days of discovery, field work and sample collection for the initial rapid-response soil investigation phase was completed. As a result, Cambria believes that Shell has complied satisfactorily with the requirements of 23 CCR sections 2653 (a) (2 through 5).



With regards to Shell's compliance with 23 CCR Section 2654(b)(1), the source of the release(s) (discharge) of product(s), the date at which release(s) began, the total quantity of the release(s) remain unknown, as initially reported in August 3, 2004 and August 25, 2004 URF forms submitted to ACHCSA. Cambria does not believe further site subsurface investigation is capable of yielding additional answers as to the nature and estimated quantity of the release.

With regards to Shell's compliance with 23 CCR Section 2654(b) (2), Cambria and Shell had conducted prior investigation which informed the conduct of the activities described to date. As a result of reviewing the California Geotracker database, Cambria was aware of local groundwater conditions at LUFT sites in the area, and was not aware of shallow groundwater existing at the depth of the USTs or fuel piping. This was not explicitly reported previously. From review of Cambria's electronic files regarding the November 14, 1997 abandonment of four tank backfill "wells" (reported to Robert Weston of ACHCSA in December 1997), Cambria believed the tank backfill wells were destroyed by grouting in place. This was not explicitly reported previously. At Shell's request, in February 2004, Cambria had conducted a well survey of California Department of Water Resources records of driller's reports for water-producing wells within ½ mile of the site. Cambria also reviewed the California Geotracker database for information on public water supply wells. No water producing wells of any type (domestic, irrigation, industrial, municipal, or public water supply) were identified in that survey. This was not explicitly reported previously. Cambria reported on subsurface soil conditions in the "Site Lithology" section of Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report*. From the September 2, 2004 private utility line location by Cruz Brothers Locators, Inc., Cambria had identified the locations of subsurface utilities, and this was reported graphically on the figures included in Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report*. Cambria did not specifically report on climatological conditions at the site previously. However, Cambria believes local climatological conditions are well known to all parties. Local land use was discussed in Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report* in the "Site Conditions" section of the report.

On August 25, 2004, Shell detected free product within a piping trench and submitted a second URF for the site on August 26, 2004. Shell proposed cleanup via over-excavation, coordinated the cleanup action with ACEH (ACHCSA Environmental Health Services) and performed initial work on August 27, 2004: No response is needed.

23 CCR sections 2652 through 2655 outline the reporting (,) investigation, initial response, initial abatement, initial characterization and free product removal requirements in response to this release: As discussed above, Cambria believes Shell has complied with 23 CCR sections 2652 (a), (b), and (c)(1) through (c)(8) by submitting the August 3, and August 25, 2004 URFs.



With regard to 23 CCR section 2652 (c)(9), at the time of the August 25, 2004 URF, the free product was not yet completely removed, and was not yet characterized for disposal, nor was it within 5 days of detection of the apparent unauthorized release. As discussed below, Shell subsequently disposed of the recovered free product appropriately.

With regard to 23 CCR section 2652 (c) (10), all fuel piping and dispenser pans were being replaced as part of the fuel system upgrade scope of work. Additional work on the tops of the USTs was also conducted. Cambria believes ACHCSA's CUPA division was appropriately notified and that the appropriate permits were obtained to conduct the upgrade work.

With regard to 23 CCR section 2652 (c) (11), since the exact source and cause of the fuel release is not known, Cambria and Shell can not speculate as to how this may be prevented. However, all fuel system piping and dispensing equipment (not including the USTs) was replaced under permit and inspected. Therefore, all feasible actions to prevent future releases have been taken.

With regard to 23 CCR section 2652 (d), such reports have been submitted, and Cambria believes Shell is in compliance with this paragraph.

With regard to 23 CCR section 2652 (e), as described above and in Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report*, Cambria believes Shell has complied with all necessary initial abatement and site characterization actions as required by sections 2653 and 2654. Shell is in the process of taking additional corrective action as required by Article 11 of these regulations.


Section 2652 (f) is not relevant to this case.

With regard to 23 CCR Sections 2653 and 2654, Cambria believes that Shell has complied with all these sections' requirements as reported above and as previously reported.

With regards to 23 CCR Section 2655, "Free Product Removal Requirements," Cambria believes that Shell previously complied with all items by submission of Cambria's October 13, 2004

Dispenser and Piping Upgrade and Over-Excavation Sampling Report, with the exception of Section 2655 (e) (7)

“The means of disposal and/or proposed disposition of the recovered free product” shall be reported in a free product removal report submitted to the agency within 45 days of release confirmation.



At the time of submitting the October 13, 2004 report, the recovered product was not yet disposed of. Cambria received results of Shell's Westhollow Technology Center's analysis of the product on October 5, 2004. Based on the analysis of the product, Shell's Residual Management Team determined that the material could be disposed of appropriately by recycling as “recovered product” at Shell's Martinez Refinery. On November 12, 2004, approximately four gallons of product described as “Gasoline mixture, 3, UN 1203 PG II, ERG #128” on a Straight Bill of Lading was disposed by California Hazardous Services, Inc. A copy of the Straight Bill of Lading is included as Attachment B. Cambria believes this completes Shell's compliance with the requirements of 23 CCR Section 2655.

Sections 2652 (c) (7 and 8) and 2653 (a) (5) require specific investigation and reporting tasks within 5 days of detecting an unauthorized release. Shell did not inspect the tank backfill wells for free product until October 4, 2004: As described above, upon detecting impacted soils and reporting via the August 3, 2004 URF, Cambria and Shell were not aware of the existence of free product at the site. Also, no corrective actions had yet been undertaken, since the release had just been discovered, and no cleanup actions were yet proposed. However, Cambria and Shell implicitly understood that the discovery of the condition which indicated a prior release would likely trigger opening of a LUFT case and that ACHCSA could require additional site characterization or cleanup actions. However, at the time of the August 3, 2004 URF submittal, no specific remedial action could be recommended or planned; thus, Shell and Cambria believe that Shell's indication of “other” as the “remedial action” on the URF was appropriate.

At the time, Cambria and Shell believed that the appropriate notification within 24 hours of detection was made and that the URF submittal constituted sufficient reporting pursuant to 23 CCR Section 2652 of a “full written report” within 5 working days. As of 5 days after discovery of the condition, no additional information was available, no plans for additional investigation or cleanup work had been made, and no schedule for additional work had been made, so the URF reported completely all required items under 23 CCR Section 2652 to the extent possible.

With regards to 23 CCR Section 2653 (a) (5), at the time of the July 30, 2004 soil sampling, no indication of free product was evident at the site under the existing conditions. At the time of the August 25, 2004 soil sampling when free product was observed, Cambria and Shell began

immediately to investigate the presence of free product throughout the site. In a telephone conversation with Bob Schultz of ACHCSA, Cambria proposed to ACHCSA that it would be prudent to attempt to inspect the tank backfill wells for the presence of free product, and Mr. Schultz concurred. On September 7, 2004, Cambria did attempt to inspect the tank backfill wells; however, due to the removal of pavement and gravel from the UST pit, the tank backfill wells were not accessible to Cambria. By August 27, 2004, the extent of free product in soils had been completely investigated, and no indication that free product was present in soils with 40 feet of the USTs was evident. By September 2, 2004, fuel-impacted soils were excavated to the feasible extents. On October 4, 2004, Cambria inspected the tank backfill wells and observed no product in them.



23 CCR section 2652 (c) (7 and 8) required that you propose: 1) corrective actions, and 2) a time schedule for implementation. Contrary to these requirements, the October 13, 2004 report states:

"[Shell's consultant] (Cambria) will not prepare a workplan until after receipt of comments on this report."

Following the August 25, 2004 discovery of free product, on September 26, 2004, Shell proposed to ACHCSA that Shell would conduct remedial activities including free product recovery and limited soil excavation beginning on September 27, 2004, thus satisfying the requirements of 23 CCR section 2652 (c)(7 and 8).

The initial corrective actions, including verification sampling, were completed in the field on September 7, 2004 as reported in Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report*. In Cambria's opinion, it is not clear that 23 CCR section 2652 (c) (7 and 8) applies to subsequent investigation and remediation beyond the initial response requirements. Regarding the cited comment in Cambria's October 13, 2004 report, Cambria did recommend and propose additional soil investigation (a corrective action), but felt it was appropriate to allow ACHCSA to review and comment on the adequacy of the investigation and remediation to date, and to give ACHCSA the opportunity to provide specific directives to Shell for additional work.

23 CCR Article 5 outlines the requirements of owners and operators and we request that you comply with its provisions with or without additional directive from ACEH. We encourage you to be proactive in response to discovery of unauthorized releases: Cambria has no comment on this statement.

We request that you report all items (1 through 7) required under 23 CCR 2655(e). We request that you include documentation of the total volume of free product recovered, including copies of waste manifests. Please submit this information in the workplan requested below: Portions

of the information required to be reported in 23 CCR 2655 (e) were discussed above. Cambria addresses each item, 1 through 7, below:

- 1) ***The name of the person responsible for implementing the free product removal measures:*** As reported on the August 25, 2004 URF, this person is Karen Petryna of Shell.
- 2) ***The estimated quantity, type, thickness of free product observed or measured in wells, boreholes, and excavations:*** An unknown quantity of unknown fuel product, without measurable thickness, was discovered in soil beneath piping, as previously reported. A sample of recovered product was analyzed by Shell's Westhollow Technology Center, and it was characterized as "severely weathered...unleaded gasoline." No free product has been observed in any wells or boreholes. Residual product, without measurable quantity or thickness, appeared to be present in soils beneath fuel piping and subsequent excavations, as previously reported in Cambria's October 13, 2004 *Dispenser and Piping Upgrade and Over-Excavation Sampling Report*.
- 3) ***The type free product recovery system used:*** A bucket was placed into the trench where soil sample P-6-5.0 was collected to intercept product apparently flowing from the pea gravel and geo-textile fabric remaining in place.
- 4) ***Whether any discharge will take place on-site or off-site during the recovery operation and, if so, where this discharge will be located:*** No discharge took place during the free product recovery operation.
- 5) ***The type of treatment applied to, and the effluent quality expect in, any discharge:*** Not applicable.
- 6) ***The steps that have been taken or are being taken to obtain necessary permits for the discharge:*** Not applicable.
- 7) ***The means of disposal and/or proposed disposition of the recovered free product:*** Based on analysis of the product, Shell's Residual Management Team determined that the material could be disposed of appropriately by recycling as "recovered product" at Shell's Martinez Refinery in Martinez, California. On November 12, 2004, approximately four gallons of product described as "Gasoline mixture, 3, UN 1203 PG II, ERG #128" on a Straight Bill of Lading were disposed of by California Hazardous Services, Inc. A copy of the Straight Bill of Lading is included as Attachment B.



CLOSING

Cambria believes that this submittal satisfies the requests made in Technical Comment #1 of ACHCSA's November 3, 2004 letter to Shell. Shell has transferred primary consulting responsibility for this site to Delta. Please contact Matthew Derby of Cambria if you have any questions regarding the contents of this document. Please contact Karen Petryna of Shell or Lee Dooley of Delta regarding future activities at the site.



Sincerely,
Cambria Environmental Technology, Inc.

Matthew W. Derby, P.E.
Senior Project Engineer



Attachments: A - July 30, 2004 Soil Samples Laboratory Analytical Report
B - Product Disposal Straight Bill of Lading

cc: Karen Petryna, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810
R. Lee Dooley, Delta Environmental Consultants, Inc., 175 Bernal Road, Suite 200,
San Jose, CA 95119

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ATTACHMENT A

July 30, 2004 Soil Samples Laboratory Analytical Report

Cambria Environmental Sonoma

August 02, 2004

270 Perkins Street
Sonoma, CA 95476

Attn.: Tom Magney

Project#: 206-0724

Project: SAP/CRMT #135244

Site: 8999 San Ramon Valley Rd., Dublin, CA

Dear Mr. Magney:

Attached is our report for your samples received on 07/30/2004 11:55

This report has been reviewed and approved for release. Reproduction of this report is permitted only in its entirety.

Please note that any unused portion of the samples will be discarded after 09/13/2004 unless you have requested otherwise.

We appreciate the opportunity to be of service to you. If you have any questions,

You can also contact me via email. My email address is: mbrewer@stl-inc.com

Sincerely,



Melissa Brewer
Project Manager

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab #
D-1-2.5'	07/30/2004 10:00	Soil	1
D-2-2.5'	07/30/2004 10:06	Soil	2
D-3-2.5'	07/30/2004 10:12	Soil	3
D-4-2.5'	07/30/2004 10:20	Soil	4
D-5-2.5'	07/30/2004 10:25	Soil	5
D-6-2.5'	07/30/2004 10:29	Soil	6
D-7-2.5'	07/30/2004 10:40	Soil	7

Severn Trent Laboratories, Inc.

STL San Francisco * 1220 Quarry Lane, Pleasanton, CA 94566

Tel 925 484 1919 Fax 925 484 1096 * www.stl-inc.com * CA DHS ELAP# 2496

08/02/2004 10:19

Page 1 of 10

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 3050B	Test(s): 6010B
Sample ID: D-1-2.5'	Lab ID: 2004-07-0883 - 1
Sampled: 07/30/2004 10:00	Extracted: 7/30/2004 14:38
Matrix: Soil	QC Batch#: 2004/07/30-06.15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	4.7	1.0	mg/Kg	1.00	08/02/2004 09:19	

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street
Sonoma, CA 95476
Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	3050B	Test(s):	6010B
Sample ID:	D-2-2.5	Lab ID:	2004-07-0883 - 2
Sampled:	07/30/2004 10:06	Extracted:	7/30/2004 14:38
Matrix:	Soil	QC Batch#:	2004/07/30-06.15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	7.0	1.0	mg/Kg	1.00	08/02/2004 09:23	

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 3050B	Test(s): 6010B
Sample ID: D-3-2.5'	Lab ID: 2004-07-0883 - 3
Sampled: 07/30/2004 10:12	Extracted: 7/30/2004 14:38
Matrix: Soil	QC Batch#: 2004/07/30-06.15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	6.2	1.0	mg/Kg	1.00	08/02/2004 09:26	

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 3050B	Test(s): 6010B
Sample ID: D-4-2.5	Lab ID: 2004-07-0883 - 4
Sampled: 07/30/2004 10:20	Extracted: 7/30/2004 14:38
Matrix: Soil	QC Batch#: 2004/07/30-06:15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	6.8	1.0	mg/Kg	1.00	08/02/2004 09:29	

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 3050B	Test(s): 6010B
Sample ID: D-5-2.5	Lab ID: 2004-07-0883 - 5
Sampled: 07/30/2004 10:25	Extracted: 7/30/2004 14:38
Matrix: Soil	QC Batch#: 2004/07/30-06.15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	6.9	1.0	mg/Kg	1.00	08/02/2004 09:33	

Total Lead

Cambria Environmental Sonoma

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Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 3050B	Test(s): 6010B
Sample ID: D-6-2.5	Lab ID: 2004-07-0883 - 6
Sampled: 07/30/2004 10:29	Extracted: 7/30/2004 14:38
Matrix: Soil	QC Batch#: 2004/07/30-06.15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	7.6	1.0	mg/Kg	1.00	08/02/2004 09:36	

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08/02/2004 10:19

Total Lead

Cambria Environmental Sonoma

Attn.: Tom Magney

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Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	3050B	Test(s):	6010B
Sample ID:	D-7-2.5	Lab ID:	2004-07-0883 - 7
Sampled:	07/30/2004 10:40	Extracted:	7/30/2004 14:38
Matrix:	Soil	QC Batch#:	2004/07/30-06.15

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Lead	4.6	1.0	mg/Kg	1.00	08/02/2004 09:39	

Total Lead

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Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 3050B

Method Blank

MB: 2004/07/30-06.15-011

Soil

Test(s): 6010B

QC Batch # 2004/07/30-06.15

Date Extracted: 07/30/2004 14:38

Compound	Conc.	RL	Unit	Analyzed	Flag
Lead	ND	1.0	mg/Kg	08/02/2004 09:06	

Total Lead

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Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 3050B

Test(s): 6010B

Laboratory Control Spike

Soil

QC Batch # 2004/07/30-06.15

LCS 2004/07/30-06.15-012

Extracted: 07/30/2004

Analyzed: 08/02/2004 09:10

LCSD 2004/07/30-06.15-013

Extracted: 07/30/2004

Analyzed: 08/02/2004 09:15

Compound	Conc. mg/Kg		Exp.Conc.	Recovery %		RPD	Ctrl.Limits %		Flags	
	LCS	LCSD		LCS	LCSD		%	Rec.	RPD	LCS
Lead	102	105	100.0	102.0	105.0	2.9	80-120	20		

Diesel (C9-C24)

Cambria Environmental Sonoma

Attn.: Tom Magney

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Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab #
D-2-2.5'	07/30/2004 10:06	Soil	2
D-6-2.5'	07/30/2004 10:29	Soil	6

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08/03/2004 11:41

Diesel (C9-C24)

Cambria Environmental Sonoma
Attn.: Tom Magney

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Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	3550/8015M	Test(s):	8015M
Sample ID:	D-2-2.5	Lab ID:	2004-07-0883 - 2
Sampled:	07/30/2004 10:06	Extracted:	7/30/2004 06:56
Matrix:	Soil	QC Batch#:	2004/07/30-1A.10

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Diesel	170	1.0	mg/Kg	1.00	08/02/2004 10:35	ndp
Surrogate(s) o-Terphenyl	96.7	60-130	%	1.00	08/02/2004 10:35	

Diesel (C9-C24)

Cambria Environmental Sonoma

Attn.: Tom Magney

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Sonoma, CA 95476

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Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 3550/8015M	Test(s): 8015M
Sample ID: D-6-2.5	Lab ID: 2004-07-0883 - 6
Sampled: 07/30/2004 10:29	Extracted: 7/30/2004 06:56
Matrix: Soil	QC Batch#: 2004/07/30-1A.10

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Diesel	ND	1.0	mg/Kg	1.00	08/02/2004 10:35	
Surrogate(s) o-Terphenyl	86.2	60-130	%	1.00	08/02/2004 10:35	

Diesel (C9-C24)

Cambria Environmental Sonoma

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Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 3550/8015M

Method Blank

MB: 2004/07/30-1A.10-001

Soil

Test(s): 8015M

QC Batch # 2004/07/30-1A.10

Date Extracted: 07/30/2004 06:56

Compound	Conc.	RL	Unit	Analyzed	Flag
Diesel	ND	1	mg/Kg	07/30/2004 10:31	
Surrogates(s) o-Terphenyl	91.5	60-130	%	07/30/2004 10:31	

Diesel (C9-C24)

Cambria Environmental Sonoma

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Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 3550/8015M

Test(s): 8015M

Laboratory Control Spike

Soil

QC Batch # 2004/07/30-1A.10

LCS 2004/07/30-1A.10-002

Extracted: 07/30/2004

Analyzed: 07/30/2004 10:59

LCSD 2004/07/30-1A.10-003

Extracted: 07/30/2004

Analyzed: 07/30/2004 11:26

Compound	Conc. mg/Kg		Exp.Conc.	Recovery %		RPD	Ctrl.Limits %		Flags	
	LCS	LCSD		LCS	LCSD		%	Rec.	RPD	LCS
Diesel	34.3	34.4	41.5	82.7	82.9	0.2	60-130	25		
Surrogates(s) o-Terphenyl	17.4	17.1	20.0	87.2	85.6		60-130			

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08/03/2004 11:41

Diesel (C9-C24)

Cambria Environmental Sonoma

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Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Legend and Notes

Result Flag

ndp

Hydrocarbon reported does not match the pattern of our Diesel standard

Gas/BTEX Fuel Oxygenates by 8260B (C6-C12)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab #
D-1-2.5'	07/30/2004 10:00	Soil	1
D-2-2.5'	07/30/2004 10:06	Soil	2
D-3-2.5'	07/30/2004 10:12	Soil	3

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08/02/2004 13:56

Gas/BTEX Fuel Oxygenates by 8260B (C6-C12)

Cambria Environmental Sonoma

Attn.: Tom Magney

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Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 5030B	Test(s): 8260B
Sample ID: D-1-2.5'	Lab ID: 2004-07-0883 - 1
Sampled: 07/30/2004 10:00	Extracted: 8/2/2004 12:38
Matrix: Soil	QC Batch#: 2004/08/02-1B.62

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Gasoline	17	3.9	mg/Kg	3.94	08/02/2004 12:38	
Benzene	ND	0.020	mg/Kg	3.94	08/02/2004 12:38	
Toluene	ND	0.020	mg/Kg	3.94	08/02/2004 12:38	
Ethyl benzene	0.10	0.020	mg/Kg	3.94	08/02/2004 12:38	
Total xylenes	0.49	0.020	mg/Kg	3.94	08/02/2004 12:38	
tert-Butyl alcohol (TBA)	0.062	0.039	mg/Kg	3.94	08/02/2004 12:38	
Methyl tert-butyl ether (MTBE)	0.038	0.020	mg/Kg	3.94	08/02/2004 12:38	
Di-isopropyl Ether (DIPE)	ND	0.039	mg/Kg	3.94	08/02/2004 12:38	
Ethyl tert-butyl ether (ETBE)	ND	0.020	mg/Kg	3.94	08/02/2004 12:38	
tert-Amyl methyl ether (TAME)	ND	0.020	mg/Kg	3.94	08/02/2004 12:38	
1,2-DCA	ND	0.020	mg/Kg	3.94	08/02/2004 12:38	
EDB	ND	0.020	mg/Kg	3.94	08/02/2004 12:38	
Surrogate(s)						
1,2-Dichloroethane-d4	107.4	76-124	%	3.94	08/02/2004 12:38	
Toluene-d8	96.1	75-116	%	3.94	08/02/2004 12:38	

Gas/BTEX Fuel Oxygenates by 8260B (C6-C12)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	5030B	Test(s):	8260B
Sample ID:	D-2-2.5	Lab ID:	2004-07-0883 - 2
Sampled:	07/30/2004 10:06	Extracted:	8/2/2004 11:09
Matrix:	Soil	QC Batch#:	2004/08/02-1B.62

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Benzene	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
Toluene	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
Ethyl benzene	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
Total xylenes	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
tert-Butyl alcohol (TBA)	ND	0.010	mg/Kg	1.00	08/02/2004 11:09	
Methyl tert-butyl ether (MTBE)	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
Di-isopropyl Ether (DIPE)	ND	0.010	mg/Kg	1.00	08/02/2004 11:09	
Ethyl tert-butyl ether (ETBE)	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
tert-Amyl methyl ether (TAME)	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
1,2-DCA	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
EDB	ND	0.0050	mg/Kg	1.00	08/02/2004 11:09	
Surrogate(s)						
1,2-Dichloroethane-d4	106.5	76-124	%	1.00	08/02/2004 11:09	
Toluene-d8	94.8	75-116	%	1.00	08/02/2004 11:09	

Gas/BTEX Fuel Oxygenates by 8260B (C6-C12)

Cambria Environmental Sonoma

Attn.: Tom Magney

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Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	5030B	Test(s):	8260B
Sample ID:	D-3-2.5	Lab ID:	2004-07-0883 - 3
Sampled:	07/30/2004 10:12	Extracted:	8/2/2004 11:32
Matrix:	Soil	QC Batch#:	2004/08/02-1B.62

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Gasoline	ND	1.0	mg/Kg	1.00	08/02/2004 11:32	
Benzene	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
Toluene	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
Ethyl benzene	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
Total xylenes	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
tert-Butyl alcohol (TBA)	ND	0.010	mg/Kg	1.00	08/02/2004 11:32	
Methyl tert-butyl ether (MTBE)	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
Di-isopropyl Ether (DIPE)	ND	0.010	mg/Kg	1.00	08/02/2004 11:32	
Ethyl tert-butyl ether (ETBE)	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
tert-Amyl methyl ether (TAME)	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
1,2-DCA	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
EDB	ND	0.0050	mg/Kg	1.00	08/02/2004 11:32	
Surrogate(s)						
1,2-Dichloroethane-d4	106.6	76-124	%	1.00	08/02/2004 11:32	
Toluene-d8	88.5	75-116	%	1.00	08/02/2004 11:32	

Gas/BTEX Fuel Oxygenates by 8260B (C6-C12)

Cambria Environmental Sonoma

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Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 5030B

Test(s): 8260B

Method Blank

Soil

QC Batch # 2004/08/02-1B.62

MB: 2004/08/02-1B.62-029

Date Extracted: 08/02/2004 08:29

Compound	Conc.	RL	Unit	Analyzed	Flag
Gasoline	ND	1.0	mg/Kg	08/02/2004 08:29	
tert-Butyl alcohol (TBA)	ND	0.010	mg/Kg	08/02/2004 08:29	
Methyl tert-butyl ether (MTBE)	ND	0.0050	mg/Kg	08/02/2004 08:29	
Di-isopropyl Ether (DIPE)	ND	0.010	mg/Kg	08/02/2004 08:29	
Ethyl tert-butyl ether (ETBE)	ND	0.0050	mg/Kg	08/02/2004 08:29	
tert-Amyl methyl ether (TAME)	ND	0.0050	mg/Kg	08/02/2004 08:29	
1,2-DCA	ND	0.0050	mg/Kg	08/02/2004 08:29	
EDB	ND	0.0050	mg/Kg	08/02/2004 08:29	
Benzene	ND	0.0050	mg/Kg	08/02/2004 08:29	
Toluene	ND	0.0050	mg/Kg	08/02/2004 08:29	
Ethyl benzene	ND	0.0050	mg/Kg	08/02/2004 08:29	
Total xylenes	ND	0.0050	mg/Kg	08/02/2004 08:29	
Surrogates(s)					
1,2-Dichloroethane-d4	104.0	76-124	%	08/02/2004 08:29	
Toluene-d8	102.0	75-116	%	08/02/2004 08:29	

Gas/BTEX Fuel Oxygenates by 8260B (C6-C12)

Cambria Environmental Sonoma

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Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 5030B

Test(s): 8260B

Laboratory Control Spike

Soil

QC Batch # 2004/08/02-1B.62

LCS 2004/08/02-1B.62-044

Extracted: 08/02/2004

Analyzed: 08/02/2004 07:44

LCSD 2004/08/02-1B.62-016

Extracted: 08/02/2004

Analyzed: 08/02/2004 09:16

Compound	Conc. mg/Kg		Exp.Conc.	Recovery %		RPD	Ctrl.Limits %		Flags	
	LCS	LCSD		LCS	LCSD		%	Rec.	RPD	LCS
Methyl tert-butyl ether (MTBE)	0.0450	0.0507	0.05	90.0	101.4	11.9	65-165	20		
Benzene	0.0527	0.0484	0.05	105.4	96.8	8.5	69-129	20		
Toluene	0.0552	0.0542	0.05	110.4	108.4	1.8	70-130	20		
Surrogates(s)										
1,2-Dichloroethane-d4	508	508	500	101.6	101.6		76-124			
Toluene-d8	504	495	500	100.8	99.0		75-116			

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08/02/2004 13:56

Gas/BTEX Fuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab #
D-4-2.5'	07/30/2004 10:20	Soil	4
D-5-2.5'	07/30/2004 10:25	Soil	5
D-6-2.5'	07/30/2004 10:29	Soil	6
D-7-2.5'	07/30/2004 10:40	Soil	7

Gas/BTEXFuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s): 5030B	Test(s): 8260B
Sample ID: D-4-2.5	Lab ID: 2004-07-0883 - 4
Sampled: 07/30/2004 10:20	Extracted: 8/3/2004 14:07
Matrix: Soil	QC Batch#: 2004/08/02-3A.62
Analysis Flag: o (See Legend and Note Section)	

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Gasoline	4700	500	mg/Kg	10.00	08/03/2004 14:07	
Benzene	ND	5.0	mg/Kg	10.00	08/03/2004 14:07	
Toluene	130	5.0	mg/Kg	10.00	08/03/2004 14:07	
Ethyl benzene	57	5.0	mg/Kg	10.00	08/03/2004 14:07	
Total xylenes	440	5.0	mg/Kg	10.00	08/03/2004 14:07	
tert-Butyl alcohol (TBA)	ND	25	mg/Kg	10.00	08/03/2004 14:07	
Methyl tert-butyl ether (MTBE)	ND	5.0	mg/Kg	10.00	08/03/2004 14:07	
Di-isopropyl Ether (DIPE)	ND	10	mg/Kg	10.00	08/03/2004 14:07	
Ethyl tert-butyl ether (ETBE)	ND	5.0	mg/Kg	10.00	08/03/2004 14:07	
tert-Amyl methyl ether (TAME)	ND	5.0	mg/Kg	10.00	08/03/2004 14:07	
1,2-DCA	ND	5.0	mg/Kg	10.00	08/03/2004 14:07	
EDB	ND	5.0	mg/Kg	10.00	08/03/2004 14:07	
Surrogate(s)						
1,2-Dichloroethane-d4	NA	53-129	%	10.00	08/03/2004 14:07	sd
Toluene-d8	NA	47-136	%	10.00	08/03/2004 14:07	sd

Gas/BTEXFuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

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Sonoma, CA 95476
Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	5030B	Test(s):	8260B
Sample ID:	D-5-2.5	Lab ID:	2004-07-0883 - 5
Sampled:	07/30/2004 10:25	Extracted:	8/3/2004 12:25
Matrix:	Soil	QC Batch#:	2004/08/02-3A.62

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Gasoline	ND	50	mg/Kg	1.00	08/03/2004 12:25	
Benzene	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
Toluene	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
Ethyl benzene	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
Total xylenes	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
tert-Butyl alcohol (TBA)	11	2.5	mg/Kg	1.00	08/03/2004 12:25	
Methyl tert-butyl ether (MTBE)	9.0	0.50	mg/Kg	1.00	08/03/2004 12:25	
Di-isopropyl Ether (DIPE)	ND	1.0	mg/Kg	1.00	08/03/2004 12:25	
Ethyl tert-butyl ether (ETBE)	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
tert-Amyl methyl ether (TAME)	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
1,2-DCA	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
EDB	ND	0.50	mg/Kg	1.00	08/03/2004 12:25	
Surrogate(s)						
1,2-Dichloroethane-d4	115.2	53-129	%	1.00	08/03/2004 12:25	
Toluene-d8	106.6	47-136	%	1.00	08/03/2004 12:25	

Gas/BTEXFuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street
Sonoma, CA 95476
Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	5030B	Test(s):	8260B
Sample ID:	D-6-2.5	Lab ID:	2004-07-0883 - 6
Sampled:	07/30/2004 10:29	Extracted:	8/3/2004 12:47
Matrix:	Soil	QC Batch#:	2004/08/02-3A.62

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Benzene	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
Toluene	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
Ethyl benzene	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
Total xylenes	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
tert-Butyl alcohol (TBA)	20	2.5	mg/Kg	1.00	08/03/2004 12:47	
Methyl tert-butyl ether (MTBE)	1.5	0.50	mg/Kg	1.00	08/03/2004 12:47	
Di-isopropyl Ether (DIPE)	ND	1.0	mg/Kg	1.00	08/03/2004 12:47	
Ethyl tert-butyl ether (ETBE)	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
tert-Amyl methyl ether (TAME)	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
1,2-DCA	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
EDB	ND	0.50	mg/Kg	1.00	08/03/2004 12:47	
Surrogate(s)						
1,2-Dichloroethane-d4	137.9	53-129	%	1.00	08/03/2004 12:47	sh
Toluene-d8	130.4	47-136	%	1.00	08/03/2004 12:47	

Gas/BTEXFuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Prep(s):	5030B	Test(s):	8260B
Sample ID:	D-7-2.5	Lab ID:	2004-07-0883 - 7
Sampled:	07/30/2004 10:40	Extracted:	8/3/2004 13:09
Matrix:	Soil	QC Batch#:	2004/08/02-3A.62

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Gasoline	ND	50	mg/Kg	1.00	08/03/2004 13:09	
Benzene	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
Toluene	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
Ethyl benzene	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
Total xylenes	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
tert-Butyl alcohol (TBA)	3.3	2.5	mg/Kg	1.00	08/03/2004 13:09	
Methyl tert-butyl ether (MTBE)	1.4	0.50	mg/Kg	1.00	08/03/2004 13:09	
Di-isopropyl Ether (DIPE)	ND	1.0	mg/Kg	1.00	08/03/2004 13:09	
Ethyl tert-butyl ether (ETBE)	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
tert-Amyl methyl ether (TAME)	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
1,2-DCA	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
EDB	ND	0.50	mg/Kg	1.00	08/03/2004 13:09	
Surrogate(s)						
1,2-Dichloroethane-d4	116.1	53-129	%	1.00	08/03/2004 13:09	
Toluene-d8	121.5	47-136	%	1.00	08/03/2004 13:09	

Gas/BTEXFuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 5030B

Method Blank

MB: 2004/08/02-3A.62-003

Soil

Test(s): 8260B

QC Batch # 2004/08/02-3A.62

Date Extracted: 08/03/2004 11:19

Compound	Conc.	RL	Unit	Analyzed	Flag
Gasoline	ND	50	mg/Kg	08/03/2004 11:19	
Benzene	ND	0.50	mg/Kg	08/03/2004 11:19	
Toluene	ND	0.50	mg/Kg	08/03/2004 11:19	
Ethyl benzene	ND	0.50	mg/Kg	08/03/2004 11:19	
Total xylenes	ND	0.50	mg/Kg	08/03/2004 11:19	
tert-Butyl alcohol (TBA)	ND	2.5	mg/Kg	08/03/2004 11:19	
Methyl tert-butyl ether (MTBE)	ND	0.50	mg/Kg	08/03/2004 11:19	
Di-isopropyl Ether (DIPE)	ND	1.0	mg/Kg	08/03/2004 11:19	
Ethyl tert-butyl ether (ETBE)	ND	0.50	mg/Kg	08/03/2004 11:19	
tert-Amyl methyl ether (TAME)	ND	0.50	mg/Kg	08/03/2004 11:19	
1,2-DCA	ND	0.50	mg/Kg	08/03/2004 11:19	
EDB	ND	0.50	mg/Kg	08/03/2004 11:19	
Surrogates(s)					
1,2-Dichloroethane-d4	123.2	53-129	%	08/03/2004 11:19	
Toluene-d8	104.4	47-136	%	08/03/2004 11:19	

Gas/BTEX Fuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street
Sonoma, CA 95476
Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724
SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Batch QC Report

Prep(s): 5030B

Test(s): 8260B

Laboratory Control Spike

Soil

QC Batch # 2004/08/02-3A.62

LCS 2004/08/02-3A.62-001

Extracted: 08/03/2004

Analyzed: 08/03/2004 10:35

LCSD 2004/08/02-3A.62-002

Extracted: 08/03/2004

Analyzed: 08/03/2004 10:57

Compound	Conc. mg/Kg		Exp.Conc.	Recovery %		RPD	Ctrl.Limits %		Flags	
	LCS	LCSD		LCS	LCSD		%	Rec.	RPD	LCS
Benzene	10.2	11.1	10	102.0	111.0	8.5	69-129	20		
Toluene	10.4	11.2	10	104.0	112.0	7.4	70-130	20		
Methyl tert-butyl ether (MTBE)	10.0	8.88	10	100.0	88.8	11.9	65-165	20		
Surrogates(s)										
1,2-Dichloroethane-d4	278	285	250	111.2	114.0		53-129			
Toluene-d8	281	290	250	112.4	116.0		47-136			

Severn Trent Laboratories, Inc.

08/03/2004 14:41

STL San Francisco * 1220 Quarry Lane, Pleasanton, CA 94566

Tel 925 484 1919 Fax 925 484 1096 * www.stl-inc.com * CA DHS ELAP# 2496

Gas/BTEXFuel Oxygenates by 8260B (High Level)

Cambria Environmental Sonoma

Attn.: Tom Magney

270 Perkins Street

Sonoma, CA 95476

Phone: (707) 933-2366 Fax: (707) 935-6649

Project: 206-0724

SAP/CRMT #135244

Received: 07/30/2004 11:55

Site: 8999 San Ramon Valley Rd., Dublin, CA

Legend and Notes

Analysis Flag

o

Reporting limits were raised due to high level of analyte present in the sample.

Result Flag

sd

Surrogate recovery not reportable due to required dilution.

sh

Surrogate recovery was higher than QC limit due to matrix interference.

1220 Quarry Lane
Pleasanton, CA 94566

(925) 484-1819 (925) 484-1096 fax

Shell Project Manager to be invoiced:

- SCIENCE & ENGINEERING
- TECHNICAL SERVICES
- OIL & HOUSTON

Bill Merchant

2004-07-0883

INCIDENT NUMBER (S&E ONLY)

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DATE: 7/30/04

SAP or CRMT NUMBER (S&E/CRMT)

	1	3	5	2	4	4
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PAGE: 1 of 1

ANALYST COMPANY Cambria Environmental Technology, Inc.	LOG CODE CETS	SITE ADDRESS (Street and City) 8999 San Ramon Valley Road, Dublin, CA	TELEPHONE 707-933-2366	PHONE FAX 707-933-2366	CONSULTANT PROJECT NO. 206-8724
ADDRESS 270 Perkins Street, Sonoma, CA 95476			TELEPHONE 707-933-2366	FAX 707-935-6649	
PRODUCT CONTACT (Name and Title) Tom Magney		NAME OF ANALYST (Name) Tom Magney	E-MAIL sonnemee@cambria-env.com		
TURNAROUND TIME (BUSINESS DAYS) <input type="checkbox"/> 15 DAYS <input type="checkbox"/> 5 DAYS <input type="checkbox"/> 72 HOURS <input type="checkbox"/> 48 HOURS <input checked="" type="checkbox"/> 24 HOURS <input type="checkbox"/> LESS THAN 24 HOURS		REQUESTED ANALYSIS			

SA - RWQCS REPORT FORMAT S&E AGENCY
 QCMR MTRC CONFIRMATION, HIGHEST _____ HIGHEST per BIDDING _____ ALL _____
 SPECIAL INSTRUCTIONS OR NOTES: CHECK BOX IF ECD IS NOT NEEDED

Field Sample Identification	SAMPLING DATE	SAMPLING TIME	MATRIX	NO. OF CONT.	TPH - Purgeable	TPH - Extractable (80/15m)	BTEX	MIBK	IBA	5 Oxygenates	1,2 DCA and EOB [EOD]	Ethanol	Methanol	VOCs by 8260B	Semi-Volatiles by 2270C	Lead <input checked="" type="checkbox"/> Total <input type="checkbox"/> Pb <input type="checkbox"/> Cu <input type="checkbox"/> Zn <input type="checkbox"/>	LUFTS <input type="checkbox"/> Total <input type="checkbox"/> S12 <input type="checkbox"/> TSP	CAN17 <input type="checkbox"/> Total <input type="checkbox"/> S12 <input type="checkbox"/> TSP	Test for Disposal
D-1-2.5'	7/30	1000	SO	1	X	X				X	X					X			
D-2-2.5'	7/30	1006	SO	1		X	X			X	X					X			
D-3-2.5'	7/30	1012	SO	1	X	X				X	X					X			
D-4-2.5'	7/30	1020	SO	1	X	X				X	X					X			
D-5-2.5'	7/30	1015	SO	1	X	X				X	X					X			
D-6-2.5'	7/30	1029	SO	1		X	X			X	X					X			
D-7-2.5'	7/30	1040	SO	1	X	X				X	X					X			

FIELD NOTES:
Container/Preservative of PID Readings or Laboratory Notes

11°C
TEMPERATURE ON RECEIPT

RUSH

Requested by (Signature) Scott Lewis	Received by (Signature) Debra H... / STL-SF	Date: 7/30/04	Time: 11:55
Requested by (Signature)	Received by (Signature)	Date:	Time:
Requested by (Signature)	Received by (Signature)	Date:	Time:

ATTACHMENT B
Product Disposal Straight Bill of Lading

