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Alameda County
Environmental Health

April 2, 2007

Jerry Wickham, P.G.
Hazardous Materials Specialist
ALAMEDA COUNTY ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Project No. 33107-007526.00

Subject: Subsurface Investigation Report
Clorox Services Company, 7280 Johnson Drive, Pleasanton, CA
Fuel Leak Case No. RO0002859

Dear Mr. Wickham:

Bureau Veritas North America, Inc. (Bureau Veritas) has completed the enclosed Investigation Report on behalf of Clorox Services Company (Clorox) for the subject site. We collected soil and grab groundwater samples as requested in your March 1, 2007 letter. Based on the field observations and sample data, Bureau Veritas recommends no additional investigation or remediation at the Site. On behalf of Clorox, we request that ACHCSA provide closure for SLIC number RO0002859.

Please review the enclosed Report and please contact me at (925) 426-2681 if you have any questions.

Sincerely,



Michael J. Zimmerman, P.E., R.E.A.
Senior Project Manager
Environmental Services

MJZ/mjz

Enclosure

cc: Chet Green, Clorox Services Company

Bureau Veritas North America, Inc.

6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Main (925) 426-2600

Fax (925) 426-0106

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Subsurface Investigation Report

Clorox Services Company
7280 Johnson Drive
Pleasanton, California

April 2, 2007
Project Number 33107-007526.00.00

Prepared for
Clorox Services Company
Pleasanton, California

Bureau Veritas North America
6920 Koll Center Parkway
Pleasanton, California 94566
925.426.2600
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1.0 INTRODUCTION

Bureau Veritas North America, Inc. (Bureau Veritas) prepared this *Subsurface Investigation Report* ("Report") on behalf of Clorox Services Company (Clorox) regarding potential groundwater impacts in the vicinity of the former diesel underground storage tank (UST) at the Clorox facility located at 7280 Johnson Drive in Pleasanton, California (the "Site"). The Site location is presented in Figures 1 and 2.

This Report documents the completion of field activities as presented in our *Groundwater Sample Workplan* dated February 28, 2007, which was approved by Alameda County Health Care Services Agency (ACHCSA) in a letter dated March 1, 2007 (Appendix A). The Site is identified as Fuel Leak Case Number RO0002859 and GeoTracker Global ID T0600100447.

As required by the ACHCSA, Bureau Veritas uploaded this Report to the ACHCSA Local Oversight Program (LOP) website and uploaded this Report and its data to the California Regional Water Quality Control Board (RWQCB) GeoTracker database.

2.0 BACKGROUND

On December 28, 2006, ACHCSA requested by letter that Clorox collect at least one grab groundwater sample at the Site in relation to a UST that was removed in April 2004. The May 2004 *UST Closure Report* documented the UST closure and stated that confirmation soil samples from the UST excavation did not contain constituents of concern. The May 2004 report indicated total petroleum hydrocarbon (TPH) quantified as diesel (TPH-d) was detected at 24 milligrams per kilogram (mg/kg) in the stockpiled soil that was removed and disposed offsite. ACHCSA's December 2006 letter requested a groundwater sample based on the concentration of TPH-d detected in the stockpiled soil (Appendix A).

On January 24, 2007, Bureau Veritas contacted Jerry Wickham of ACHCSA to discuss the agency's rationale for the proposed sample and to confirm the minimum sampling and analysis requirements for this Investigation. Mr. Wickham confirmed that ACHCSA wanted a minimum of one grab groundwater sample based on the soil stockpile sample because the Site is in a sensitive area where groundwater may be a potential source of drinking water. Mr. Wickham indicated the sample should be analyzed for TPH-d, benzene, toluene, ethylbenzene, xylenes (BTEX, collectively), and methyl tert-butyl ether (MTBE). In the March 1, 2007 approval letter, ACHCSA also requested that Bureau Veritas log and field screen the soils from the direct-push boring and collect soil samples. ACHCSA requested that the soil samples be analyzed if evidence of contamination in soil was observed during either during field screening activities. In addition, Bureau Veritas determined it would be prudent to analyze the soil samples if the grab groundwater sample results reported detections.

3.0 SCOPE OF WORK

Bureau Veritas performed the following scope of work to complete this investigation:

- Conducted Pre-Field Activities to plan and permit the Field Activities. Performed pre-field activities that included obtaining appropriate drilling permits and updating our site.
- Completed Field Activities to collect the samples.
- Prepared this Report.

4.0 PRE-FIELD ACTIVITIES

Prior to conducting the field activities described in Section 5.0, Bureau Veritas completed the following pre-field activities:

- Secured site access with the property owner.
- Obtained drilling permit No. 27037 from the Alameda County Zone 7 Water Agency (Zone 7) for the subsurface groundwater investigation (Appendix B).
- Developed a site-specific Health and Safety Plan (HASP) for the proposed work at the Site in accordance with the requirements of the State of California General Industry Safety Order (GISO) 5192 and Title 29 of the Code of Federal Regulations, Section 1910.120 (29 CFR 1910.120). A copy of the HASP was kept onsite during field activities. The HASP detailed the work to be performed, safety precautions, emergency response procedures, nearest hospital information, and onsite personnel responsible for managing emergency situations.
- Marked the area with white paint where drilling was planned and contacted Underground Service Alert (USA) to mark underground utilities in the designated work area. USA was contacted at least 48 hours prior to drilling, as required by law.
- Retained CSU Surveying of Pleasanton, California, a private utility locating contractor, to clear the proposed soil boring location of underground utilities.

5.0 FIELD ACTIVITIES

Below is a summary of the field activities completed during this investigation. On March 2, 2007, Bureau Veritas supervised the advancement of two exploratory borings (SB-1 and SB-1B) as presented on Figure 2. As requested by ACHCSA, one boring (SB-1) was logged, field screened, and soil samples were collected. The second boring, approximately 6 inches from SB-1B, was advanced using a Hydropunch® sampler in order to collect a groundwater sample.

5.1 SOIL SAMPLING

Bureau Veritas contracted with Gregg Drilling & Testing, Inc. (Gregg), a California-licensed (C-57) drilling company, to advance the boreholes. Gregg utilized truck-mounted direct-push (GeoProbe) equipment to advance Boring SB-1 to a depth of 48 feet below ground surface (bgs), which was the depth of first-encountered groundwater. Soil cores approximately 2 inches in diameter were obtained using a core barrel sampler. Soil samples were typically collected from the bottom of each 4-foot sampling interval. Representative soil samples were cut from select plastic liners and sealed with Teflon tape and plastic end caps.

Field screening of soil cores was performed using a photoionization detector (PID) to evaluate the potential presence of volatile organic compounds (VOCs) in the headspace of select soil samples. To initiate the headspace testing procedure, soil samples were removed from plastic liners, placed into labeled plastic bags, sealed, and allowed to equalize. After sufficient time had elapsed for vapor build-up inside the bags, the bags were punctured with the probe tip of the PID to allow measurement of the ionizable substances in the headspace. Measurements of the headspace were obtained as parts per million (ppm) for total VOCs.

The soil samples were placed in a pre-chilled ice chest pending transportation to the analytical laboratory. The sample information was recorded onto a chain-of-custody document that accompanied the samples to the laboratory and indicated that all soil samples were to be put on hold pending the results of the groundwater sample since no visible staining, odor, or PID readings were observed.

5.2 GRAB GROUNDWATER SAMPLING

Bureau Veritas attempted to collect a grab groundwater sample from Boring SB-1B utilizing a closed-system Hydropunch® sampler. The Hydropunch® was advanced beyond the drill bit into undisturbed soil, and then retracted to allow water to flow into the sampling chamber by exposing the screen. Groundwater was encountered at a depth of approximately 44 feet bgs but not in sufficient volume to collect a sample using the Hydropunch® sampler. Therefore, one-inch diameter, schedule 40# PVC casing was temporarily placed into Boring SB-1 to collect a grab groundwater sample. The lower 10 feet of casing in SB-1 consisted of 0.10-inch slotted screen to allow for water to enter the temporary well point.

The grab-groundwater sample was collected using a decontaminated stainless steel bailer. Upon retrieval, the grab groundwater sample was transferred into appropriate laboratory-supplied containers, capped, sealed, labeled with identifying information, and placed in a pre-chilled ice chest for transportation to the analytical laboratory under formal chain-of-custody documentation.

Upon collection of samples, the PVC casing was withdrawn from the open borehole (SB-1) and the remaining borehole annuli were backfilled with neat cement to grade in accordance with the methods approved by Zone 7. Upon completion of grouting, the surface was repaired to its pre-existing condition.

5.3 WASTE DISPOSAL

Drill cuttings generated during the investigation were placed in a 5-gallon plastic container that was clearly labeled and sealed for temporary onsite storage pending offsite disposal.

5.4 CHEMICAL ANALYSES

One grab groundwater sample was submitted to Severn Trent Laboratories, Inc. (STL), a state-certified analytical laboratory located in Pleasanton, California, for analysis by the following approved United States Environmental Protection Agency (EPA) methods as requested by the ACHCSA:

- TPH-d by EPA Method 8015M with silica gel cleanup (SGCU).
- BTEX, MTBE, with fuel oxygenates, and Gasoline Range Organics (GRO) by EPA Method 8260B.

The grab groundwater sample was analyzed on a standard 5-business day turn-around basis.

6.0 INVESTIGATION FINDINGS

6.1 GROUNDWATER ANALYTICAL RESULTS

A summary of the grab groundwater analytical results is provided on Table 1. Below is a summary of the chemicals detected in the grab groundwater sample collected during this sampling event.

- TPH-d was detected at 80 micrograms per liter (ug/L).
- GRO, BTEX, MTBE, and other fuel oxygenates were not detected above the laboratory method detection limits.

A copy of the grab groundwater analytical laboratory report is presented in Appendix D.

6.2 SOIL ANALYTICAL RESULTS

No visible staining, odor, or PID readings were observed during the field activities; the results of the headspace tests performed on the soil samples placed in sealed plastic bags were recorded on the boring log sheets (Appendix C). The soil samples submitted to the laboratory were not analyzed since the field screening indicated no soil contamination was present at SB-1 and the grab groundwater sample results did not have detections that indicated a petroleum release occurred. Bureau Veritas asked the laboratory to dispose of the soil samples that were put on hold.

6.3 QUALITY ASSURANCE/QUALITY CONTROL

The analytical laboratory data was reviewed by Bureau Veritas to establish its validity and to ensure the laboratory data was complete and accurate. We verified that hold times for each analytical method were achieved and that the laboratory achieved the specific data quality objectives for each selected analytical method. A review of the data validation process indicates that the laboratories completed all QA/QC activities required for the sample such as blanks, lab control samples, matrix spikes, and duplicates. Minor QA/QC issues, which are common for these analyses, are noted in the laboratory reports presented in Appendix D. The QA/QC parameters for the samples were within acceptable limits and suggest that the data is useful for its intended purpose.

7.0 CONCLUSIONS

The results of the field screening indicated no soil contamination was present at SB-1. Based on the field observations and the grab groundwater sample results, it does not appear a petroleum release occurred associated with the former UST in the area of SB-1. With the exception of the TPH-d detection, no chemicals were detected in grab groundwater sample SB-1. The TPH-d detection of 80 ug/L does not appear to warrant further investigation or remediation based on the following:

- The groundwater detection is below the RWQCB Environmental Screening Level (ESL) established at 100 ug/L for TPH-d in areas where groundwater is a potential source of drinking water¹. The ESL is a conservative risk-based screening level concentration often used by agencies in the Bay Area to evaluate investigation data. A detection of a chemical at a concentration below the ESL typically does not require further investigation or remediation since it should not have an impact on groundwater.
- The laboratory narrative (Appendix D) indicates that a peak of the SB-1 chromatogram is discrete and does not occur in the same pattern as the standard diesel chromatogram. Based on this narrative and a discussion with the laboratory, the TPH-d detection does not appear to be caused by diesel. SGCU up was used as a preparation method prior to analyzing the groundwater sample for TPH-d. AS SGCU is effective in removing the majority of non-petroleum (i.e., natural) organics, it is possible that the TPH-d detection represents a false positive of residual non-petroleum organics that could not be removed by SGCU.

8.0 RECOMMENDATIONS

On behalf of Clorox, Bureau Veritas recommends no additional investigation or remediation at the Site. Based on the field observations and sample results, we request that ACHCSA provide closure for SLIC number RO0002859.

¹ Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater (4th edition, February 2005) is a technical report prepared by staff of the California Regional Water Quality Board, San Francisco Bay Region.

This Report prepared by:



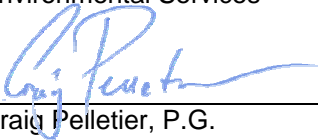
Allison Florence
Consultant
Environmental Services

This Report reviewed by:

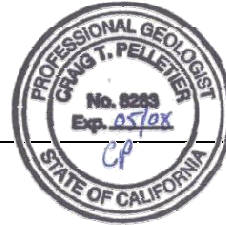


Michael Zimmerman, P.E., R.E.A.
Senior Project Manager
Environmental Services

This Report reviewed by:



Craig Pelletier, P.G.
Project Manager
Environmental Services
April 2, 2007



TABLES

Table 1
Groundwater Sample Results
 Clorox Services Company
 7280 Johnson Drive
 Pleasanton, California
 Bureau Veritas

Sample ID	Date	TPH-d (ug/L)	Benzene (ug/L)	Ethylbenzene (ug/L)	MTBE (ug/L)	TAME (ug/L)	Toluene (ug/L)	Xylenes (ug/L)	TBA (ug/L)	DIPE (ug/L)	GRO (ug/L)	Ethyl tert-butyl ether (ug/L)
SB-1	3/2/2007	80	<0.50	<0.50	<0.50	<0.50	<0.50	<1.0	<5.0	<1.0	<50	<0.50
RWQCB ESL		100	1.0	30	5.0	N/A	40	20	12	N/A	N/A	N/A

Notes:

DIPE = Diisopropyl ether analyzed by EPA Method 8260B

GRO = Gasoline range organics analyzed by EPA Method 8260B

MTBE = Methyl tert-butyl ether analyzed by EPA Method 8260B

N/A = No ESL has been established for this compound

RWQCB ESL = San Francisco Bay Regional Water Quality Control Board Environmental Screening Level for shallow soil where groundwater is a potential source of drinking water, February 2005

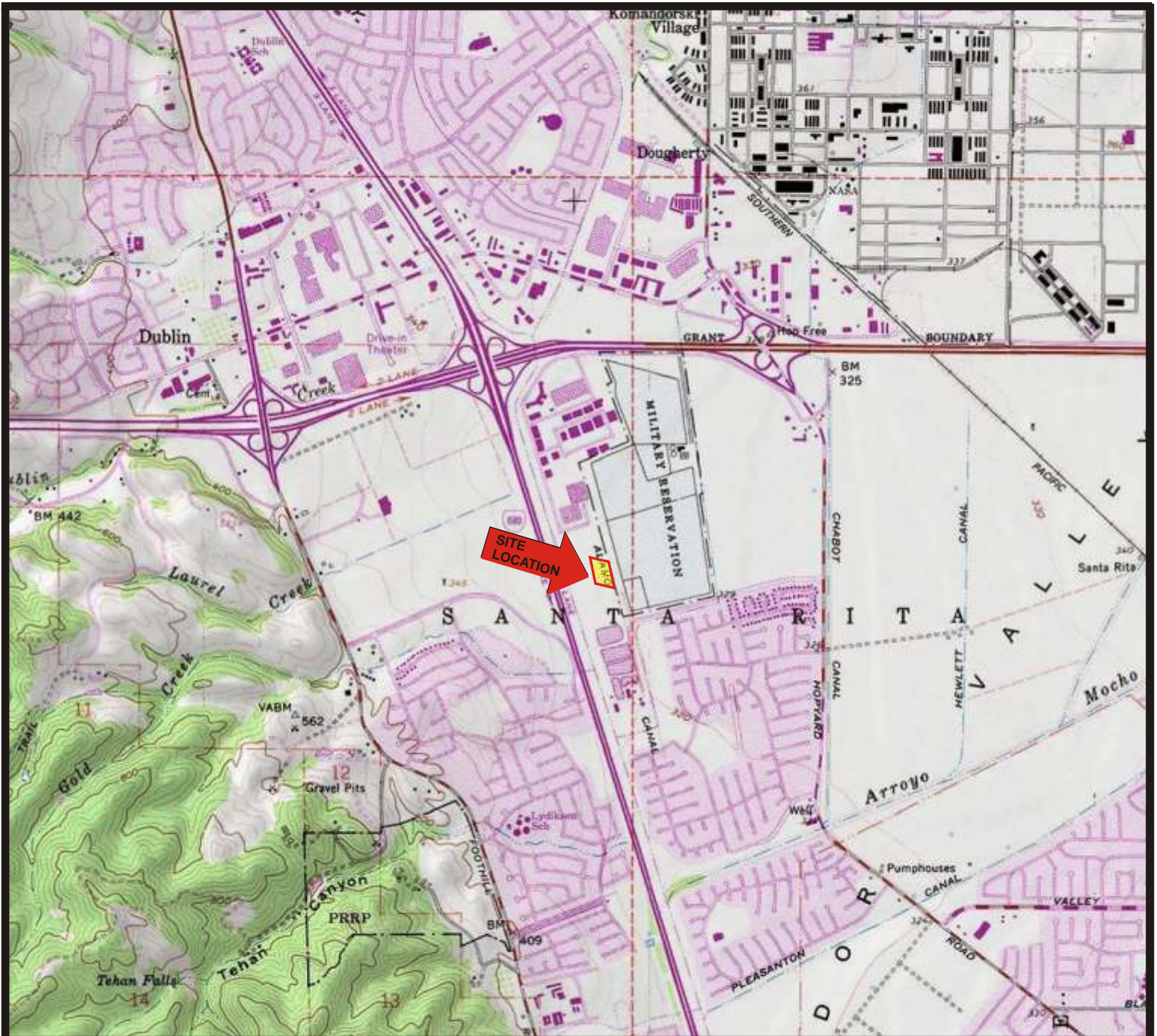
TAME = Tertiary-amyl methyl ether analyzed by EPA Method 8260B

TBA = Tertiary butyl alcohol analyzed by EPA Method 8260B

TPH-d = Total Petroleum Hydrocarbons quantified as diesel analyzed by EPA Method 8015M

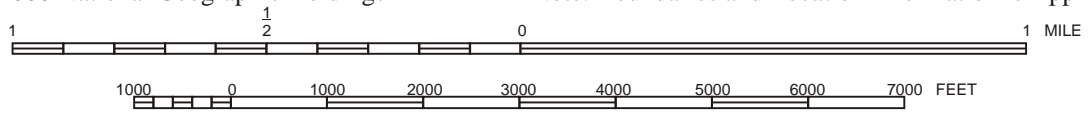
ug/L = micrograms per liter

FIGURES



Map Source: TOPO!© 2000 National Geographic Holdings

Note: Boundaries and Location Information is Approximate



Portion of the 7.5-Minute Series Dublin, California
 Quadrangle Topographic Map (Datum: NAD 27)
 United States Department of the Interior
 Geological Survey
 1980



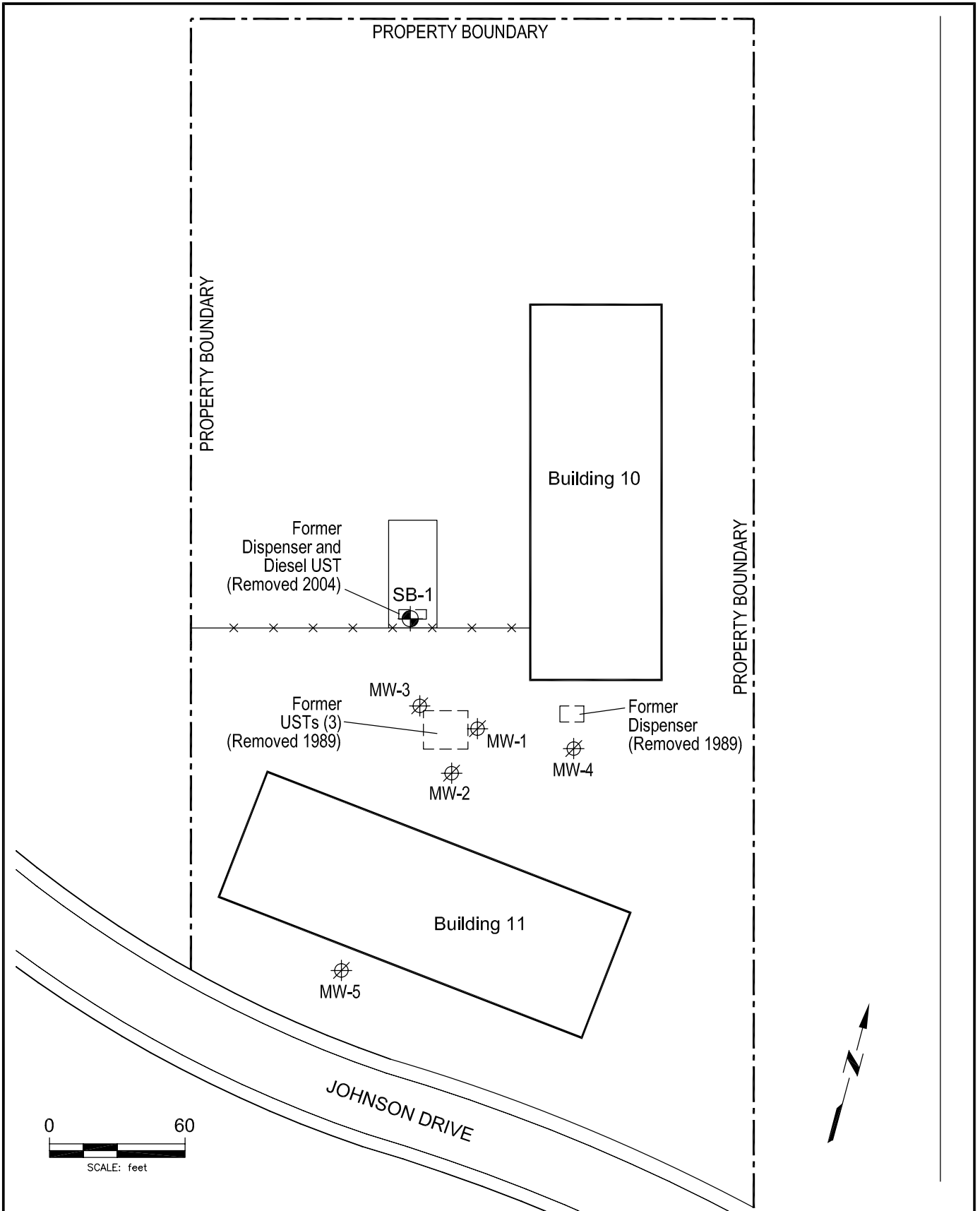
QUADRANGLE LOCATION

SITE LOCATION MAP
 Clorox
 7280 Johnson Drive
 Pleasanton, California
 Clayton Project No. 33106-006723.00



Figure

1





Legend:

-  Soil Boring/Groundwater Sample Location
-  Destroyed Well

SITE PLAN

CLOROX SERVICES COMPANY
 7280 JOHNSON DRIVE
 PLEASANTON, CALIFORNIA
 Project No. 33107-007526.00

Figure

2

03/29/07
 SITE0307.DWG



**BUREAU
 VERITAS**

APPENDIX A
LETTERS FROM THE COUNTY

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

Certified Mail #7002 2030 0006 9574 1730

December 27, 2006

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

NOTICE OF RESPONSIBILITY

Site Name & Address:

**CLOROX SERVICES COMPANY
7280 JOHNSON DR
PLEASANTON, CA 94588**

Local ID: RO0002859
Related ID: NA
RWQCB ID:
Global ID: T0600100447

Responsible Party:

**CHET GREEN
CLOROX SERVICES COMPANY
7200 JOHNSON DR
PLEASANTON CA 94588-8004**

Date First Reported: 5/21/2004
Substance: 12034 Diesel fuel oil and additives, Nos.1-D, 2-D,
2-4
Funding for Oversight: LOPF - LOP Federal Fund
Multiple RPs?: No

Pursuant to sections 25297.1 and 25297.15 of the Health and Safety Code, you are hereby notified that the above site has been placed in the Local Oversight Program and the individual(s) or entity(ies) shown above, or on the attached list, has (have) been identified as the party(ies) responsible for investigation and cleanup of the above site. Section 25297.15 further requires the primary or active Responsible Party to notify all current record owners of fee title before the local agency considers cleanup or site closure proposals or issues a closure letter. For purposes of implementing section 25297.15, this agency has identified CLOROX SERVICES COMPANY as the primary or active Responsible Party. It is the responsibility of the primary or active Responsible Party to submit a letter to this agency, within 20 calendar days of receipt of this notice that identifies all current record owners of fee title. It is also the responsibility of the primary or active Responsible Party to certify to the local agency that the required notifications have been made at the time a cleanup or site closure proposal is made or before the local agency makes a determination that no further action is required. If property ownership changes in the future, you must notify this local agency within 20 calendar days from when you are informed of the change.

Any action or inaction by this local agency associated with corrective action, including responsible party identification, is subject to petition to the State Water Resources Control Board. Petitions must be filed within 30 days from the date of the action/inaction. To obtain petition procedures, please FAX your request to the State Water Board at (916) 341-5808 or telephone (916) 341-5650.

Pursuant to section 25296.10(c)(6) of the Health and Safety Code, a responsible party may request the designation of an administering agency when required to conduct corrective action. Please contact this office for further information about the designation process.

Please contact your caseworker WICKHAM, JERRY, at this office at (510)567-6791 if you have questions regarding your site.

Date: 12/21/06

ARIU LEVI, Chief
Contract Project Director

Action: Add
Reason:

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

December 27, 2006

Site Name & Address:

CLOROX SERVICES COMPANY
7280 JOHNSON DR
PLEASANTON, CA 94588

Local ID: RO0002859
Related ID: NA
RWQCB ID:
Global ID: T0600100447

All Responsible Parties

RP has been named a Primary RP - CHET GREEN
CLOROX SERVICES COMPANY
7200 JOHNSON DR | PLEASANTON, CA 94588-8004

Responsible Party Identification Background

Alameda County Environmental Health (ACEH) names a "Responsible Party," as defined under 23 C.C.R Sec. 2720. Section 2720 defines a responsible party 4 ways. An RP can be:

1. "Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."
2. "In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."
3. "Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."
4. "Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."

ACEH has named the responsible parties for this site as detailed below.

Existence of Unauthorized Release

One 10,000-gallon Underground Storage Tank, that last contained diesel fuel, was removed from the site on April 16, 2004. Laboratory analytical results from the tank removal sampling indicated low levels of total petroleum hydrocarbons as diesel fuel in the tank excavation backfill material.

Responsible Party Identification

Clorox Services Company is a responsible party for the fuel leak because the unauthorized release occurred during the time that Clorox Services Company owned and operated the UST (Definition 2), Clorox Services Company is the current owner of the property where an unauthorized release has occurred (Definition 3), and Clorox Services Company had control of the UST at the time of or following an unauthorized release (Definition 4).

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

December 28, 2006

Mr. Chet Green
Clorox Services Company
7200 Johnson Drive
Pleasanton, CA 94588-8004

Subject: Fuel Leak Case No. RO0002859 and Geotracker Global ID T0600100447, Clorox Services Company, 7280 Johnson Drive, Pleasanton, CA 94588 – Request for Work Plan

Dear Mr. Green:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the report entitled, "Closure Report for Diesel Underground Storage Tank," dated May 21, 2004. The report, which was prepared on your behalf by Clayton Group Services, presents the results of tank removal activities conducted at 7280 Johnson Drive in April 2004. Total petroleum hydrocarbons as diesel were detected in one composite soil sample collected from the soil stockpile. The site is within the Livermore-Amador Valley, which is an area where groundwater is actively used as a drinking water supply. Groundwater within the Livermore-Amador Groundwater Basin constitutes a valuable current and future resource. Due to the location of your site within a groundwater basin where groundwater is used for drinking water, we request that you collect a minimum of one groundwater sample at the site to evaluate whether groundwater has potentially been affected by a fuel release.

Please submit a work plan detailing your proposal to investigate potential soil and groundwater contamination by **March 23, 2007**. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

REQUEST FOR INFORMATION

ACEH's case files for the subject site contains only the report entitled, "Closure Report for Diesel Underground Storage Tank," dated May 21, 2004. We request that you submit copies of any other reports you have documenting additional investigation activities or other relevant work related to this UST system/site with the work plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **March 23, 2007** – Work Plan for Subsurface Investigation

These reports are being requested pursuant to California Health and Safety Code Section 25296.10, 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to

present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. *In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):*

cleanup proposal (Corrective Action Plan)

request for case closure

local agency intention to make a determination that no further action is required

local agency intention to issue a closure letter

- OR -

B. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

Mr. Chet Green
December 28, 2006
Page 4

UNDERGROUND STORAGE TANK CLEANUP FUND

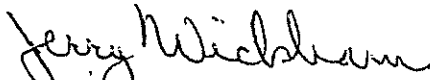
Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Michael Hurd
Clayton Group Services, Inc.
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted**.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

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

March 1, 2007

Mr. Chet Green
Clorox Services Company
7200 Johnson Drive
Pleasanton, CA 94588-8004

Subject: Fuel Leak Case No. RO0002859 and Geotracker Global ID T0600100447, Clorox Services Company, 7280 Johnson Drive, Pleasanton, CA 94588 – Work Plan Approval

Dear Mr. Green:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the recently submitted work plan entitled, "Groundwater Sample Workplan," dated February 28, 2007. The Work Plan, which was prepared on your behalf by Bureau Veritas, proposed advancing one soil boring and collection and analysis of one grab groundwater sample. The proposed scope of work is acceptable provided that the technical comments below are addressed and incorporated during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan or technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@accgov.org) prior to the start of field activities.

REQUEST FOR INFORMATION

ACEH's case files for the subject site contains only the report entitled, "Closure Report for Diesel Underground Storage Tank," dated May 21, 2004, which reports the results from the 2004 removal of a diesel UST and dispenser. We previously requested that you submit copies of any other reports you have documenting additional investigation activities or other work that is relevant to the fuel release case. We note that a UST and dispenser were removed in 1989 from an area immediately south of the current fuel release site. Information on the geology and hydrogeology and analytical results from the monitoring wells and any other investigation conducted in this area of the immediately to the south is directly relevant to the diesel UST release currently being investigated. Therefore, please submit all data and reports for the five monitoring wells and other investigation related to the three USTs removed in 1989. ACEH files do not include information on a fuel leak investigation related to the 1989 UST removal.

Post-It® Fax Note	7671	Date	3/1/07	# of pages	4
To	Mike Zimmerman	From	Jerry Wickham		
Co./Dept.	Bureau Veritas	Co.			
Phone #		Phone #	510-567-6791		
Fax #	925-426-0106	Fax #			

Mr. Chet Green
March 1, 2007
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TECHNICAL COMMENTS

1. **Proposed Soil Sampling.** We request that soils from the proposed direct push soil boring be screened in the field as the boring is advanced. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. Please note that if visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. Any soil samples collected from intervals of visible staining, odor, or elevated PID readings are to be analyzed for TPH as gasoline and TPH as diesel by EPA Method 8015 and BTEX and MTBE by EPA Method 8260. Please present boring logs, screening results, and any analytical data for soil samples in the Site Investigation Report requested below.
2. **Proposed Groundwater Sampling and Analyses.** The proposed grab groundwater sampling methods are acceptable. We request that the groundwater sample be analyzed for TPH as gasoline in addition to the proposed analyses for TPH as diesel, BTEX, and fuel oxygenates. Please present results in the Site Investigation Report requested below.
3. **Monitoring Wells.** Please confirm that the five monitoring wells shown on Figure 2 of the Work Plan have been decommissioned. As described above in the Request for Information, data from these wells and any subsurface investigation conducted in this area are relevant to the current fuel leak release and are to be submitted to ACEH with the Site Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **July 2, 2007** – Site Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB)

Mr. Chet Green
March 1, 2007
Page 3

Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

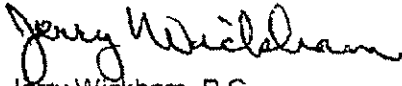
AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Mr. Chet Green
March 1, 2007
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Michael Zimmerman
Bureau Veritas
6920 Koll Center Parkway, Suite 216
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

APPENDIX B
SOIL BORING PERMITS



ZONE 7 WATER AGENCY

100 NORTH CANYONS PARKWAY, LIVERMORE, CALIFORNIA 94551 VOICE (925) 454-5000 FAX (925) 454-5728

DRILLING PERMIT APPLICATION

FOR APPLICANT TO COMPLETE

FOR OFFICE USE

LOCATION OF PROJECT 7280 Johnson Drive
Pleasanton, CA

PERMIT NUMBER 27037

WELL NUMBER _____

APN 941-1300-14

California Coordinates Source _____ ft. Accuracy: _____ ft.
CCN _____ ft. CCE _____ ft.
APN 941-1300-14

PERMIT CONDITIONS

(Circled Permit Requirements Apply)

CLIENT
Name Clorox Services Co.
Address 7280 Johnson Dr. Phone 925-425-4424
City Pleasanton, CA Zip 94588

- A. GENERAL
 1. A permit application should be submitted so as to arrive at the Zone 7 office five days prior to proposed starting date.
 2. Submit to Zone 7 within 60 days after completion of permitted work the original Department of Water Resources Water Wall Drillers Report or equivalent for well projects or drilling logs and location sketch for geotechnical projects.
 3. Permit is void if project not begun within 90 days of approval date.

APPLICANT
Name Allison Firenze, Clayton Group Services
Address 17200 Kelly Ct. Pkwy #210 Phone 925-424-2411
City Pleasanton CA Zip 94566

- B. WATER SUPPLY WELLS
 1. Minimum surface seal thickness is two inches of cement grout placed by tremie.
 2. Minimum seal depth is 50 feet for municipal and industrial wells or 20 feet for domestic and irrigation wells unless a lesser depth is specially approved.
 3. An access port at least 0.5 inches in diameter is required on the wellhead for water level measurements.
 4. A sample port is required on the discharge pipe near the wellhead.

TYPE OF PROJECT

Well Construction		Geotechnical Investigation	
Cathodic Protection	<input type="checkbox"/>	General	<input checked="" type="checkbox"/>
Water Supply	<input type="checkbox"/>	Contamination	<input type="checkbox"/>
Monitoring	<input type="checkbox"/>	Well Destruction	<input type="checkbox"/>

- C. GROUNDWATER MONITORING WELLS INCLUDING PIEZOMETERS
 1. Minimum surface seal thickness is two inches of cement grout placed by tremie.
 2. Minimum seal depth for monitoring wells is the maximum depth practicable or 20 feet.

PROPOSED WELL USE

New Domestic	<input type="checkbox"/>	Irrigation	<input type="checkbox"/>
Municipal	<input type="checkbox"/>	Remediation	<input type="checkbox"/>
Industrial	<input type="checkbox"/>	Groundwater Monitoring	<input type="checkbox"/>
Dewatering	<input type="checkbox"/>	Other _____	<input type="checkbox"/>

DRILLING METHOD:

Mud Rotary	<input type="checkbox"/>	Air Rotary	<input type="checkbox"/>	Hollow Stem Auger	<input type="checkbox"/>
Cable Tool	<input type="checkbox"/>	Direct Push	<input checked="" type="checkbox"/>	Other _____	<input type="checkbox"/>

- D. GEOTECHNICAL. Backfill bore hole with compacted cuttings or heavy bentonite and upper two feet with compacted material. In areas of known or suspected contamination, tremied cement grout shall be used in place of compacted cuttings.
- E. CATHODIC. Fill hole above anode zone with concrete placed by tremie.
- F. WELL DESTRUCTION. See attached.
- G. SPECIAL CONDITIONS. Submit to Zone 7 within 60 days after the completion of permitted work the well installation report Including all soil and water laboratory analysis results.

DRILLING COMPANY Gagey Drilling
DRILLER'S LICENSE NO. 485145

WELL PROJECTS

Drill Hole Diameter	<u>2</u> in.	Maximum	
Casing Diameter	_____ in.	Depth	<u>25</u> ft.
Surface Seal Depth	_____ ft.	Number	<u>1</u>

SOIL BORINGS

Number of Borings	_____	Maximum	
Hole Diameter	_____ in.	Depth	_____ ft.

ESTIMATED STARTING DATE 2/2/07
ESTIMATED COMPLETION DATE 2/2/07

Approved Wyman Hong Date 2/23/07
Wyman Hong

I hereby agree to comply with all requirements of this permit and Alameda County Ordinance No. 73-68.

APPLICANT'S SIGNATURE [Signature] Date 2/21/07

ATTACH SITE PLAN OR SKETCH

Revised: April 27, 2005

APPENDIX C
SOIL BORING LOGS



**BUREAU
VERITAS**

LOG OF SOIL BORING

Project No.: 33107-007526.00
 Project Name: Clorox
 Location: 7280 Johnson Dr., Pleasanton, CA
 Logged By: A. Florence

BORING NO.

SB-1

Start Date: 3/2/2007 Start Time: 08:05 Elevation (ft, msl):
 Finish Date: 3/2/2007 Finish Time: 11:15 Boring Diameter (in): 2"

Driller: Gregg Drill Method: Direct Push
 Hammer Weight: N/A Drop: N/A

Borehole Completion Data: Neat Cement Grout

Depth To ∇ (ft)	41	Depth To ∇ (ft)	
Time:		Time:	
Date:		Date:	

SAMPLE INTERVAL	SAMPLE RECOVERY (in)	SAMPLE ID	PID READING (ppm)	TIME	DEPTH (ft)	SAMPLE GRAPHIC LOG	USCS	DESCRIPTION
				0805				CONCRETE
					1			BACKFILL/PEA-GRAVEL (hand-augered)
					2			
					3			CLAY (hand-augered)
					4		CL	
		5.0	0.0	0831	5			CLAY black to gray, very compact, medium plasticity, dry, no odor
					6			
					7			
		32	8.0	0833	8			
					9			
					10			
					11			
		20	12.0	0838	12		CL	CLAY black to gray, very compact, medium plasticity, dry, no odor
					13			
					14			
					15			
		48	16.0	0844	16			CLAY black to gray, very compact, medium plasticity, dry, no odor
					17			
					18			
					19			
		48	20.0	0853				



LOG OF SOIL BORING

Project No.: 33107-007526.00
 Project Name: Clorox
 Location: 7280 Johnson Dr., Pleasanton, CA
 Logged By: A. Florence

BORING NO.
SB-1



SAMPLE INTERVAL	SAMPLE RECOVERY (in)	SAMPLE ID	PID READING (ppm)	TIME	DEPTH (ft)	SAMPLE GRAPHIC LOG	USCS	DESCRIPTION
					21			CLAY black to gray, very compact, medium plasticity, dry, no odor
					22			
					23			
	48	24.0	0.0	0852	24			soft, medium plasticity, moist
					25			CLAY black to gray, orange mottling, very compact, medium plasticity, dry, no odor
					26			
					27			
	46	28.0	0.0	0858	28		CL	
					29			
					30			
					31			
	46	32.0	0.0	0908	32			CLAY black to gray, medium soft, medium plasticity, dry, no odor
					33			
					34			
					35			
	48	36.0	0.0	1015	36			CLAY black, soft, very plastic, moist, no odor
					37			
					38			
					39			
	48	40.0	0.0	1025	40		CH	
					41			wet
					42			
					43			
	42	44.0	0.3	1105	44			



LOG OF SOIL BORING

Project No.: 33107-007526.00
 Project Name: Clorox
 Location: 7280 Johnson Dr., Pleasanton, CA
 Logged By: A. Florence

BORING NO.
SB-1

SAMPLE INTERVAL	SAMPLE RECOVERY (in)	SAMPLE ID	PID READING (ppm)	TIME		DEPTH (ft)	SAMPLE GRAPHIC LOG	USCS	DESCRIPTION
X	48	48.0	0.0	1115		46		CH	CLAY black, soft, very plastic, moist, no odor
						47			
						48			EOB at 48 feet bgs.
						49			
						50			
						51			
						52			
						53			
						54			
						55			
						56			
						57			
						58			
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						64			
						65			
						66			
						67			
						68			
						69			

APPENDIX D

GROUNDWATER ANALYTICAL LABORATORY REPORTS



ANALYTICAL REPORT

Job Number: 720-8047-1

Job Description: Clorox

For:
Bureau Veritas
Clayton Group Services, Inc.
6920 Koll Center Parkway
Suite 216
Pleasanton, CA 94566

Attention: Ms. Allison Florence

A handwritten signature in black ink that reads "D Sharma".

Dimple Sharma
Project Manager I
dsharma@stl-inc.com
03/13/2007
Revision: 1

cc: Mike Zimmerman

Project Manager: Dimple Sharma

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

Case Narrative for job: 720-J8047-1

Client: Bureau Veritas
Date: 03/13/2007

Semi Volatiles GC Analysis

Other - Observation

DRO concentration is due to presence of a discrete peak.

Affected Items

720-8047-G-1-A +A

Batch: 720-19042

Method: 720-8015B_DRO

EXECUTIVE SUMMARY - Detections

Client: Bureau Veritas

Job Number: 720-8047-1

Lab Sample ID Analyte	Client Sample ID	Result / Qualifier	Reporting Limit	Units	Method
720-8047-1 <i>Silica Gel Cleanup</i> Diesel Range Organics [C10-C28]	W-1	80	50	ug/L	8015B

METHOD SUMMARY

Client: Bureau Veritas

Job Number: 720-8047-1

Description	Lab Location	Method	Preparation Method
Matrix: Water			
Volatile Organic Compounds by GC/MS	STL SF	SW846 8260B	
Purge-and-Trap	STL SF		SW846 5030B
Nonhalogenated Organics using GC/FID -Modified (Diesel Range Organics)	STL SF	SW846 8015B	
Separatory Funnel Liquid-Liquid Extraction	STL SF		SW846 3510C SGC

LAB REFERENCES:

STL SF = STL San Francisco

METHOD REFERENCES:

SW846 - "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

SAMPLE SUMMARY

Client: Bureau Veritas

Job Number: 720-8047-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
720-8047-1	W-1	Water	03/02/2007 1245	03/02/2007 1600

Analytical Data

Client: Bureau Veritas

Job Number: 720-8047-1

Client Sample ID: W-1

Lab Sample ID: 720-8047-1
Client Matrix: Water

Date Sampled: 03/02/2007 1245
Date Received: 03/02/2007 1600

8015B Nonhalogenated Organics using GC/FID -Modified (Diesel Range Organics)

Method:	8015B	Analysis Batch: 720-19042	Instrument ID: HP DRO5
Preparation:	3510C SGC	Prep Batch: 720-18987	Lab File ID: N/A
Dilution:	1.0		Initial Weight/Volume: 250 mL
Date Analyzed:	03/07/2007 0001		Final Weight/Volume: 1 mL
Date Prepared:	03/06/2007 1053		Injection Volume:
			Column ID: PRIMARY

Analyte	Result (ug/L)	Qualifier	RL
Diesel Range Organics [C10-C28]	80		50
Surrogate	%Rec		Acceptance Limits
o-Terphenyl	78		50 - 130
Capric Acid (Surr)	0		0 - 5

DATA REPORTING QUALIFIERS

Lab Section	Qualifier	Description
-------------	-----------	-------------

Quality Control Results

Client: Bureau Veritas

Job Number: 720-8047-1

QC Association Summary

Lab Sample ID	Client Sample ID	Report Basis	Client Matrix	Method	Prep Batch
GC/MS VOA					
Analysis Batch:720-19120					
LCS 720-19120/2	Lab Control Spike	T	Water	8260B	
LCSD 720-19120/1	Lab Control Spike Duplicate	T	Water	8260B	
MB 720-19120/4	Method Blank	T	Water	8260B	
720-8047-1	W-1	T	Water	8260B	

Report Basis

T = Total

GC Semi VOA

Prep Batch: 720-18987					
LCS 720-18987/2-AA	Lab Control Spike	A	Water	3510C SGC	
LCSD 720-18987/3-AA	Lab Control Spike Duplicate	A	Water	3510C SGC	
MB 720-18987/1-AA	Method Blank	A	Water	3510C SGC	
720-8047-1	W-1	A	Water	3510C SGC	
Analysis Batch:720-19042					
LCS 720-18987/2-AA	Lab Control Spike	A	Water	8015B	720-18987
LCSD 720-18987/3-AA	Lab Control Spike Duplicate	A	Water	8015B	720-18987
MB 720-18987/1-AA	Method Blank	A	Water	8015B	720-18987
720-8047-1	W-1	A	Water	8015B	720-18987

Report Basis

A = Silica Gel Cleanup

Quality Control Results

Client: Bureau Veritas

Job Number: 720-8047-1

Method Blank - Batch: 720-19120

Method: 8260B
Preparation: 5030B

Lab Sample ID: MB 720-19120/4
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 03/07/2007 1046
Date Prepared: 03/07/2007 1046

Analysis Batch: 720-19120
Prep Batch: N/A
Units: ug/L

Instrument ID: Varian 3900E
Lab File ID: c:\varianws\data\200703\03
Initial Weight/Volume: 10 mL
Final Weight/Volume: 10 mL

Analyte	Result	Qual	RL
Benzene	ND		0.50
Ethylbenzene	ND		0.50
MTBE	ND		0.50
TAME	ND		0.50
Toluene	ND		0.50
Xylenes, Total	ND		1.0
TBA	ND		5.0
DIPE	ND		1.0
Gasoline Range Organics (GRO)-C5-C12	ND		50
Ethyl tert-butyl ether	ND		0.50
Surrogate	% Rec	Acceptance Limits	
Toluene-d8 (Surr)	95	77 - 121	
1,2-Dichloroethane-d4 (Surr)	97	73 - 130	

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

Quality Control Results

Client: Bureau Veritas

Job Number: 720-8047-1

**Lab Control Spike/
Lab Control Spike Duplicate Recovery Report - Batch: 720-19120**

**Method: 8260B
Preparation: 5030B**

LCS Lab Sample ID: LCS 720-19120/2
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 03/07/2007 0940
Date Prepared: 03/07/2007 0940

Analysis Batch: 720-19120
Prep Batch: N/A
Units: ug/L

Instrument ID: Varian 3900E
Lab File ID: c:\varianws\data\200703\030
Initial Weight/Volume: 10 mL
Final Weight/Volume: 10 mL

LCSD Lab Sample ID: LCSD 720-19120/1
Client Matrix: Water
Dilution: 1.0
Date Analyzed: 03/07/2007 1002
Date Prepared: 03/07/2007 1002

Analysis Batch: 720-19120
Prep Batch: N/A
Units: ug/L

Instrument ID: Varian 3900E
Lab File ID: c:\varianws\data\200703\030
Initial Weight/Volume: 10 mL
Final Weight/Volume: 10 mL

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Benzene	87	89	69 - 129	2	25		
MTBE	95	88	65 - 165	8	25		
Toluene	102	105	70 - 130	3	25		
Surrogate	LCS % Rec		LCSD % Rec		Acceptance Limits		
Toluene-d8 (Surr)	102		101		77 - 121		
1,2-Dichloroethane-d4 (Surr)	94		89		73 - 130		

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

Quality Control Results

Client: Bureau Veritas

Job Number: 720-8047-1

Method Blank - Batch: 720-18987

Lab Sample ID: MB 720-18987/1-AA
 Client Matrix: Water
 Dilution: 1.0
 Date Analyzed: 03/07/2007 0001
 Date Prepared: 03/06/2007 1053

Analysis Batch: 720-19042
 Prep Batch: 720-18987
 Units: ug/L

**Method: 8015B
 Preparation: 3510C SGC
 Silica Gel Cleanup**

Instrument ID: HP DRO5
 Lab File ID: N/A
 Initial Weight/Volume: 250 mL
 Final Weight/Volume: 1 mL
 Injection Volume:
 Column ID: PRIMARY

Analyte	Result	Qual	RL
Diesel Range Organics [C10-C28]	ND		50
Surrogate	% Rec		Acceptance Limits
o-Terphenyl	71		50 - 130
Capric Acid (Surr)	0		0 - 5

**Lab Control Spike/
 Lab Control Spike Duplicate Recovery Report - Batch: 720-18987**

LCS Lab Sample ID: LCS 720-18987/2-AA
 Client Matrix: Water
 Dilution: 1.0
 Date Analyzed: 03/07/2007 0001
 Date Prepared: 03/06/2007 1053

Analysis Batch: 720-19042
 Prep Batch: 720-18987
 Units: ug/L

**Method: 8015B
 Preparation: 3510C SGC
 Silica Gel Cleanup**

Instrument ID: HP DRO5
 Lab File ID: N/A
 Initial Weight/Volume: 250 mL
 Final Weight/Volume: 1 mL
 Injection Volume:
 Column ID: PRIMARY

LCSD Lab Sample ID: LCSD 720-18987/3-AA
 Client Matrix: Water
 Dilution: 1.0
 Date Analyzed: 03/07/2007 0001
 Date Prepared: 03/06/2007 1053

Analysis Batch: 720-19042
 Prep Batch: 720-18987
 Units: ug/L

Instrument ID: HP DRO5
 Lab File ID: N/A
 Initial Weight/Volume: 250 mL
 Final Weight/Volume: 1 mL
 Injection Volume:
 Column ID: PRIMARY

Analyte	% Rec.		Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
	LCS	LCSD					
Diesel Range Organics [C10-C28]	60	60	50 - 130	1	30		
Surrogate	LCS % Rec		LCSD % Rec		Acceptance Limits		
o-Terphenyl	65		66		50 - 130		

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



CHAIN OF CUSTODY

720-8047

104350
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Lab: STL

TAT: 5-day

Report results to:

Name Allison Florence
 Company Clayton Group Services
 Mailing Address 6920 Koll Center Parkway, Ste. 216
 City, State, Zip Pleasanton, California 94566
 Telephone No. (925) 426-2600
 Fax No. (925) 426-0106

Project Information

Project No. 33107-007526.00
 Name Clorox Services company
 Location 7280 Johnson Drive, Pleasanton

Special instructions and/or specific regulatory requirements:

Sample Identification					Analyses Requested												Sample Condition/Comments	Preservative
					TPH-g.d. 8015M (with silica gel clean up)	BTEX, MTBE, and fuel oxygenates 8260B												
Date Sampled	Time Sampled	Matrix/Media	No. of Conts.															
W-1	3/2/2007	1245	water	7	x	x												
TRIP BLANK																		

Collected by: Allison Florence
 Relinquished by: AP Date/Time _____
 Relinquished by: _____ Date/Time _____
 Method of Shipment: _____

Collector's Signature: AC
 Received by: Joan Nellen Date/Time 3/2/07 1600
 Received by: _____ Date/Time _____
 Sample Condition on Rcpt: 5c

LOGIN SAMPLE RECEIPT CHECK LIST

Client: Bureau Veritas

Job Number: 720-8047-1

Login Number: 8047

Question	T/F/NA	Comment
Radioactivity either was not measured or, if measured, is at or below background	NA	
The cooler's custody seal, if present, is intact.	NA	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
If necessary, staff have been informed of any short hold time or quick TAT needs	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	