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2:26 pm, Jan 09, 2008

Alameda County
Environmental Health

Environmental Resources Management

1777 Botelho Drive Suite 260 Walnut Creek, CA 94596 (925) 946-0455 (925) 946-9968 (fax)

7 January 2008

<u>Via Electronic Mail</u>

Mr. Jim Roessler (jim@roesslerinvestmentgroup.com)
Roessler Investment Group
360 Post Street, Suite 602
San Francisco, California 94108

Mr. Bruce Burrows (bburrowsre@aol.com)
The Burrows Company
6 Southpoint Road
Orinda, California 94563

Subject: Indoor Air Sampling Results

Montessori Plus

7238 San Ramon Boulevard

Dublin, California

Dear Sirs:

In accordance with our proposed scope of work dated 27 November 2007, ERM-West, Inc. (ERM) presents this summary of findings associated with the subject project. ERM's scope of work included the following:

- On 13 December 2007, collecting indoor air samples at three locations (including a duplicate sample) and one outside (background) location at the subject site;
- Submitting the samples for laboratory analysis for halogenated volatile organic compounds (HVOCs) using United States Environmental Protection Agency (USEPA) Method TO-15 with Selective Ion Monitoring (SIM);
- Comparing the data from this sampling event with those from a previous sampling event performed by AEI Consultants (AEI) on 20 October 2007; and
- Preparing this summary report of findings.

Consistent with the procedure implemented by AEI, ERM utilized 6-liter Summa canisters with flow regulators configured to capture integrated air samples over an 8-hour period. ERM endeavored to



collect air samples at the same locations used by AEI (and using the same sample identification numbers) as shown in Attachment A, a location map reproduced from AEI's 15 June 2007 *Vapor Intrusion Investigation Workplan* (Figure 2 – Site Plan). It should be noted, however, that ERM collected one air sample in addition to those collected by AEI, because AEI was unable to collect a sample at proposed location IDA-3 in October due to technical difficulties.

Analytical results for samples collected by ERM are summarized along with AEI's October 2007 results in Table 1, which is included as Attachment B. For comparison purposes, the following applicable, human-health risk-based screening levels are also provided in Table 1:

- California Human Health Screening Levels (CHHSLs) for indoor air in a residential setting, established by the California Environmental Protection Agency [CalEPA] in January 2005; and
- Environmental Screening Levels (ESLs) for indoor air in a residential setting, established by the San Francisco Bay Regional Water Quality Control Board [Regional Board] in November 2007.

The key results are as follows:

- Tetrachloroethylene (PCE) was the only HVOC detected, and was reported as being present in each of the samples from both sampling events;
- All of the PCE detections in the indoor air samples exceeded both the CHHSL and ESL for residential indoor air;
- The detected PCE concentrations for indoor air samples were generally consistent with those reported by AEI;
- The detected PCE concentration in ERM's outdoor air sample (ERM-ODA-1) was approximately twice that detected in AEI's sample at the same location (0.79 micrograms per cubic meter $[\mu g/m^3]$ versus 0.34 $\mu g/m^3$); and
- Method reporting limits for ERM samples analyzed by USEPA TO-15 SIM were significantly lower than those for AEI's samples. The initial analyses attained reporting limits that were sufficiently low such that exceedances of the screening levels could be identified for all analytes except vinyl chloride. The vinyl chloride reporting limits for the December 2007 samples were an order of magnitude lower, and only

slightly exceeded the screening levels; therefore, there is a low likelihood that vinyl chloride is present in indoor air at concentrations that pose a risk to human health.

Air Toxics Ltd. (Air Toxics), a California-certified analytical laboratory, provided analytical services to ERM. Air Toxics' report, including the work order summary, laboratory narrative, results, and chain of custody (copy), is presented in Attachment 3.

We note in a letter from the Alameda County Health Care Services Agency (ACHCSA), dated 18 December 2007, that the agency had concerns over AEI's results for indoor air sampling. Specifically, ACHCSA expressed concern over the absence of typical PCE breakdown products¹ in AEI's samples, given the facility that is the presumed source of the PCE had been in operation for several years prior to the discovery of the release. ACHCSA noted that the lack of these compounds might suggest that the analytical method used² is not appropriate for determining concentrations of PCE breakdown products. Recognizing that typical PCE breakdown products were not detected in ERM's samples either, we contacted Air Toxics for their perspective on this issue. According to Air Toxics' laboratory contact, USEPA Method TO-15 with SIM is the appropriate methodology for identifying the presence of PCE breakdown products in air samples. It is Air Toxics' opinion that the results are representative, and that the PCE breakdown products are not present at the reporting limits indicated. Further evaluation of site conditions would be required to provide an explanation for the observed phenomenon.

In addition to the collection of additional indoor and outdoor air samples, you also requested that ERM provide an opinion regarding AEI's stated belief that the October 2007 sample results suggest that the Montessori School should be moved in order to ensure protection of the students' and staff's health and welfare. As we indicated in our 6

i.e., cis-1,2-dichloroethene, trans-1,2-dichloroethene, trichloroethene, and vinyl chloride

² AEI also used USEPA Method TO-15, but apparently not with SIM to obtain the lower reporting limits.

December 2007 email communication, we do not consider those data to statistically represent conditions that would require moving the school. We noted that, whereas the exceedances of the CHHSL (approximately 3 times that value) suggest that risks to the students and staff are in the risk mitigation range, there are likely some mechanical mitigations (probably associated with changes to HVAC system operation) that could prove to be equally protective. The latest data do not alter our prior opinion.

We appreciate the opportunity to perform this work for you, and look forward to assisting you with the next phase. If you have any questions regarding this submittal, please contact me at 925.946.0455.

Sincerely,

Michael E. Quillin, P.G.

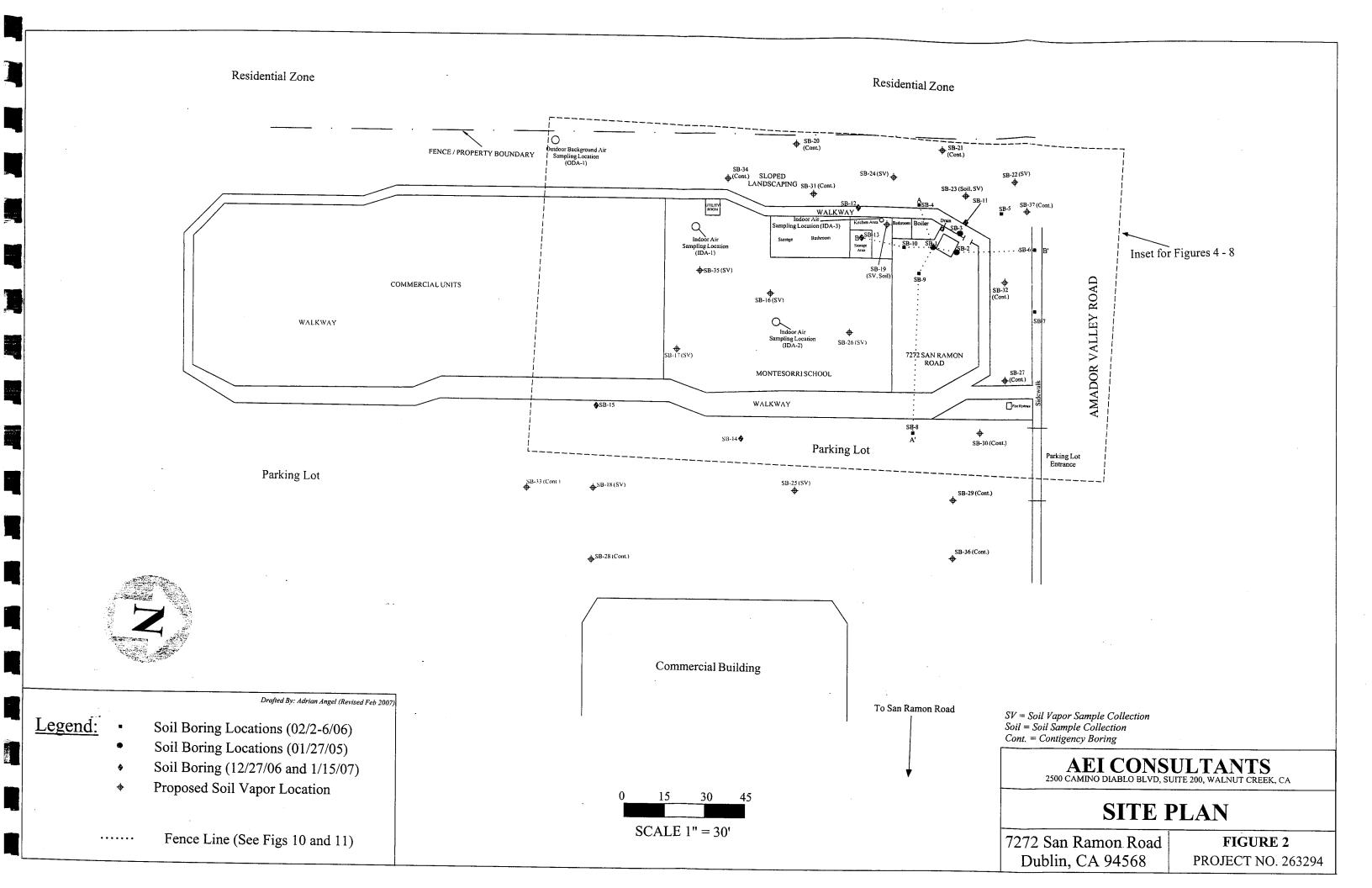
Principal-in-Charge

MEQ/jaq/0076649.**** enclosures

cc: Mr. Steven Plunkett, ACHCSA

Karl Morthole, Esq. John Lucio, ERM

Attachment A
Figure 2 – Site Plan
(from AEI's 15 June 2007
Vapor Intrusion Investigation
Workplan)



Attachment B Table 1 Indoor Air Analytical Results

Residential		_	AEI			ERM				
Compound	Indoor Air CHHSLs	Residential Indoor Air ESLs	IDA-1	IDA-2	IDA-3	ODA-1	IDA-1	IDA-2	IDA-3	ODA-1
cis-1,2-DCE	36.5	7.3	ND <7.3	ND <7.3	-	ND <7.3	ND <0.13	ND < 0.13	ND < 0.12	ND < 0.12
trans-1,2-DCE	73	15	ND < 15.0	ND < 15.0	-	ND < 15.0	ND < 0.64	ND < 0.65	ND < 0.63	ND < 0.61
PCE	0.412	0.41	1.3	1.1	-	0.34	1.2	1.2/1.3*	1.2	0.79/0.75**
TCE	1.22	1.2	ND <1.1	ND <1.1	-	ND <1.1	ND <0.17	ND <0.18	ND <0.17	ND <0.17
Vinyl chloride	0.0311	0.031	ND <0.1 ⁽¹⁾	ND < 0.1 ⁽¹⁾	-	ND <0.1 ⁽¹⁾	ND <0.041	ND <0.042	ND <0.040	ND <0.040

Notes:

All sample results are given in micrograms per cubic meters ($\mu g/m^3$).

Residential CHHSLs = California Environmental Protection Agency, California Human Health Screening Levels for Indoor Air in a residential setting, January 2005. Residential ESLs = San Francisco Bay Regional Water Quality Control Board, Environmental Screening Level for Indoor Air in a residential setting, November 2007.

- = Sample not collected
- * = Field duplicate
- ** = Lab duplicate
- ND = Non detect
- < = Indicates the compound was not detected above the stated reporting limit.

BOLD = Compound detected above the reporting limit.

Shaded concentrations indicate an exceedance of the CHHSL and/or ESL.

Laboratory Notes:

(1) = This compound's reporting limit does not meet the indoor air ESL.

Abbreviations:

cis-1,2-DCE = cis-1,2-dichloroethene

trans-1,2-DCE = trans-1,2-dichloroethene

PCE = tetrachloroethene

TCE = trichloroethene

Attachment C Air Toxics Ltd. Laboratory Report



Air Toxics Ltd. Introduces the Electronic Report

Thank you for choosing Air Toxics Ltd. To better serve our customers, we are providing your report by e-mail. This document is provided in Portable Document Format which can be viewed with Acrobat Reader by Adobe.

This electronic report includes the following:

- Work order Summary;
- Laboratory Narrative;
- Results; and
- Chain of Custody (copy).

DATE COMPLETED:

07A

08A

AN ENVIRONMENTAL ANALYTICAL LABORATORY

WORK ORDER #: 0712345

Work Order Summary

CLIENT: Mr. Doug Moberg BILL TO: Mr. Doug Moberg

ERM-West ERM-West

1777 Botelho Drive 1777 Botelho Drive

Suite 260 Suite 260

Walnut Creek, CA 94596-5042 Walnut Creek, CA 94596-5042

PHONE: 925-946-0455 x3223 **P.O.** #

01/02/2008

CCV

LCS

FAX: 925-946-9968 PROJECT # 0076649 Dublin Indoor Air Sampling

DATE RECEIVED: 12/17/2007 CONTACT: Kelly Buettner

RECEIPT **FINAL TEST FRACTION # NAME** VAC./PRES. **PRESSURE** Modified TO-15 SIM 01A ERM-IDA-1 5.0 "Hg 5 psi 02A ERM-IDA-2 Modified TO-15 SIM 5.5 "Hg 5 psi 03A ERM-IDA-2 DUP Modified TO-15 SIM 5.5 "Hg 5 psi 04A ERM-IDA-3 Modified TO-15 SIM 4.5 "Hg 5 psi 05A ERM-ODA-1 Modified TO-15 SIM 4.0 "Hg 5 psi 05AA ERM-ODA-1 Lab Duplicate Modified TO-15 SIM 4.0 "Hg 5 psi 06A Lab Blank Modified TO-15 SIM NA NA

Modified TO-15 SIM

Modified TO-15 SIM

NA

NA

NA

NA

CERTIFIED BY: DATE: 01/02/08

Laboratory Director

Certification numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763, NJ NELAP - CA004 NY NELAP - 11291, UT NELAP - 9166389892

Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act, Accreditation number: E87680, Effective date: 07/01/07, Expiration date: 06/30/08

Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

This report shall not be reproduced, except in full, without the written approval of Air Toxics Ltd.

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630 (916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020



LABORATORY NARRATIVE Modified TO-15 SIM ERM-West Workorder# 0712345



Five 6 Liter Summa Canister (SIM Certified) samples were received on December 17, 2007. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the SIM acquisition mode. The method involves concentrating up to 0.5 liters of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Method modifications taken to run these samples are summarized in the table below. Specific project requirements may over-ride the ATL modifications.

Requirement	TO-15	ATL Modifications
ICAL %RSD acceptance criteria	=30% RSD with 2<br compounds allowed out to < 40% RSD	Project specific; default criteria is =30% RSD with 10% of compounds allowed out to < 40% RSD</td
Daily Calibration	+- 30% Difference	Project specific; default criteria is = 30% Difference with 10% of compounds allowed out up to </=40%.; flag and narrate outliers</td
Blank and standards	Zero air	Nitrogen
Method Detection Limit	Follow 40CFR Pt.136 App. B	The MDL met all relevant requirements in Method TO-15 (statistical MDL less than the LOQ). The concentration of the spiked replicate may have exceeded 10X the calculated MDL in some cases

Receiving Notes

The Chain of Custody (COC) information for sample ERM-IDA-2 did not match the information on the canister with regard to canister identification. The client was notified of the discrepancy and the information on the canister was used to process and report the sample.

Analytical Notes

There were no analytical discrepancies.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

- B Compound present in laboratory blank greater than reporting limit (background subtraction not performed).
 - J Estimated value.



- E Exceeds instrument calibration range.
- S Saturated peak.
- Q Exceeds quality control limits.
- U Compound analyzed for but not detected above the reporting limit.
- UJ- Non-detected compound associated with low bias in the CCV
- N The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue



Summary of Detected Compounds MODIFIED EPA METHOD TO-15 GC/MS SIM

Client Sample ID: ERM-IDA-1				
Lab ID#: 0712345-01A				
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.032	(ppsv) 0.17	0.22	1.2
retrachioroethene	0.032	0.17	0.22	1.2
Client Sample ID: ERM-IDA-2				
Lab ID#: 0712345-02A				
Company	Rpt. Limit	Amount	Rpt. Limit	Amount
Compound	(ppbv)	(ppbv)	(uG/m3)	(uG/m3)
Tetrachloroethene	0.033	0.18	0.22	1.2
Client Sample ID: ERM-IDA-2 DUP				
Lab ID#: 0712345-03A				
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.033	0.19	0.22	1.3
Client Sample ID: ERM-IDA-3				
Lab ID#: 0712345-04A				
	Rpt. Limit	Amount	Rpt. Limit	Amount
Compound	(ppbv)	(ppbv)	(uG/m3)	(uG/m3)
Tetrachloroethene	0.032	0.18	0.21	1.2
Client Sample ID: ERM-ODA-1				
Lab ID#: 0712345-05A				
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.031	0.12	0.21	0.79
Client Sample ID: ERM-ODA-1 Lab Du	olicate			
Lab ID#: 0712345-05AA	•			
	Rpt. Limit	Amount	Rpt. Limit	Amount
Compound	(ppbv)	(ppbv)	(uG/m3)	(uG/m3)
Tetrachloroethene	0.031	0.11	0.21	0.75



Client Sample ID: ERM-IDA-1 Lab ID#: 0712345-01A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: z122006sim Dil. Factor: 1.61		Date of Collection: 12/13/07 Date of Analysis: 12/20/07 04:33 PM			
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)	
Vinyl Chloride	0.016	Not Detected	0.041	Not Detected	
cis-1,2-Dichloroethene	0.032	Not Detected	0.13	Not Detected	
Trichloroethene	0.032	Not Detected	0.17	Not Detected	
Tetrachloroethene	0.032	0.17	0.22	1.2	
trans-1,2-Dichloroethene	0.16	Not Detected	0.64	Not Detected	

		wethod	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	84	70-130	
Toluene-d8	96	70-130	
4-Bromofluorobenzene	109	70-130	



Client Sample ID: ERM-IDA-2 Lab ID#: 0712345-02A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: Dil. Factor:	z122007sim 1.64		Date of Collection: 12/13/07 Date of Analysis: 12/20/07 05:10 PM		
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)	
Vinyl Chloride	0.016	Not Detected	0.042	Not Detected	
cis-1,2-Dichloroethene	0.033	Not Detected	0.13	Not Detected	
Trichloroethene	0.033	Not Detected	0.18	Not Detected	
Tetrachloroethene	0.033	0.18	0.22	1.2	
trans-1,2-Dichloroethene	0.16	Not Detected	0.65	Not Detected	

		wethod	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	84	70-130	
Toluene-d8	97	70-130	
4-Bromofluorobenzene	105	70-130	



Client Sample ID: ERM-IDA-2 DUP

Lab ID#: 0712345-03A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: Dil. Factor:	z122008sim 1.64		Date of Collection: 12/13/07 Date of Analysis: 12/20/07 11:46 PM		
Compound	Rɒt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)	
Vinyl Chloride	0.016	Not Detected	0.042	Not Detected	
cis-1,2-Dichloroethene	0.033	Not Detected	0.13	Not Detected	
Trichloroethene	0.033	Not Detected	0.18	Not Detected	
Tetrachloroethene	0.033	0.19	0.22	1.3	
trans-1,2-Dichloroethene	0.16	Not Detected	0.65	Not Detected	

		wetnoa	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	88	70-130	
Toluene-d8	98	70-130	
4-Bromofluorobenzene	103	70-130	



Client Sample ID: ERM-IDA-3 Lab ID#: 0712345-04A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: Dil. Factor:	z122009sim 1.58			Date of Collection: 12/13/07 Date of Analysis: 12/21/07 12:50 AM		
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)		
Vinyl Chloride	0.016	Not Detected	0.040	Not Detected		
cis-1,2-Dichloroethene	0.032	Not Detected	0.12	Not Detected		
Trichloroethene	0.032	Not Detected	0.17	Not Detected		
Tetrachloroethene	0.032	0.18	0.21	1.2		
trans-1,2-Dichloroethene	0.16	Not Detected	0.63	Not Detected		

		wethod
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	83	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	101	70-130



Client Sample ID: ERM-ODA-1 Lab ID#: 0712345-05A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: Dil. Factor:	z122010sim 1.55		Date of Collection: 12/13/07 Date of Analysis: 12/21/07 01:37 AM		
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)	
Vinyl Chloride	0.016	Not Detected	0.040	Not Detected	
cis-1,2-Dichloroethene	0.031	Not Detected	0.12	Not Detected	
Trichloroethene	0.031	Not Detected	0.17	Not Detected	
Tetrachloroethene	0.031	0.12	0.21	0.79	
trans-1,2-Dichloroethene	0.16	Not Detected	0.61	Not Detected	

		wetnoa
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	85	70-130
Toluene-d8	94	70-130
4-Bromofluorobenzene	105	70-130



Client Sample ID: ERM-ODA-1 Lab Duplicate

Lab ID#: 0712345-05AA

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: Dil. Factor:	z122011sim 1.55		Date of Collection: Date of Analysis:	
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.016	Not Detected	0.040	Not Detected
cis-1,2-Dichloroethene	0.031	Not Detected	0.12	Not Detected
Trichloroethene	0.031	Not Detected	0.17	Not Detected
Tetrachloroethene	0.031	0.11	0.21	0.75

0.16

Container Type: 6 Liter Summa Canister (SIM Certified)

trans-1,2-Dichloroethene

	•	Method
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	84	70-130
Toluene-d8	93	70-130
4-Bromofluorobenzene	102	70-130

Not Detected

0.61

Not Detected



Client Sample ID: Lab Blank Lab ID#: 0712345-06A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: Dil. Factor:	z122005sim 1.00		Date of Collection: I Date of Analysis: 1	• •
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Vinyl Chloride	0.010	Not Detected	0.026	Not Detected
cis-1,2-Dichloroethene	0.020	Not Detected	0.079	Not Detected
Trichloroethene	0.020	Not Detected	0.11	Not Detected
Tetrachloroethene	0.020	Not Detected	0.14	Not Detected
trans-1,2-Dichloroethene	0.10	Not Detected	0.40	Not Detected

Container Type: NA - Not Applicable

		Method
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	86	70-130
Toluene-d8	91	70-130
4-Bromofluorobenzene	106	70-130



Client Sample ID: CCV Lab ID#: 0712345-07A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	z122002sim	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 12/20/07 01:10 PM

Compound	%Recovery
Vinyl Chloride	105
cis-1,2-Dichloroethene	95
Trichloroethene	88
Tetrachloroethene	98
trans-1,2-Dichloroethene	96

Container Type: NA - Not Applicable

		Method
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	84	70-130
Toluene-d8	109	70-130
4-Bromofluorobenzene	102	70-130



Client Sample ID: LCS Lab ID#: 0712345-08A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	z122003sim	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 12/20/07 02:03 PM

Compound	%Recovery
Vinyl Chloride	97
cis-1,2-Dichloroethene	95
Trichloroethene	92
Tetrachloroethene	106
trans-1,2-Dichloroethene	96

Container Type: NA - Not Applicable

		Method
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	78	70-130
Toluene-d8	106	70-130
4-Bromofluorobenzene	106	70-130

CHAIN-OF-CUSTODY RECORD TOXICS LTD.

Sample Transportation Notice
Relinquishing signature on this occurrent indicates that sample is being shipped in compliance with all applicable local. State, Federal, national, and international laws, regulations and ordinances of any kind. Air loxos Limited assumes no liability with respect to the octiection, handling or shipping of these samples. Refirquishing signature also indicates agreement to hold harmless, detend, and indominify Air Toxice Limited against any claim, domand, or action, of any kind, related to the collection, handling, or shipping of samples, D.O.T. Hodine (800) 467-4022

180 BLUE RAVINE ROAD, SUITE B (916) 985-1000 FAX (916) 985-1020 FOLSOM, CA 95630-4719

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Form 1290 nec."1

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