File No. 10-93-567-ST

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WORK PLAN FOR SITE INVESTIGATION FOR THE PROPERTY LOCATED AT 909 BLUEBELL DRIVE LIVERMORE, CALIFORNIA DECEMBER 18, 2006

PREPARED FOR:
MR. MASOOD AMINI
SPRINGTOWN GAS
909 BLUEBELL DRIVE
LIVREMORE, CALIFORNIA 94551

BY:
ENVIRO SOIL TECH CONSULTATNS
131 TULLY ROAD
SAN JOSE, CALIFORNIA 95111

ENVIRO SOIL TECH CONSULTANTS

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December 18, 2006

File No. 10-93-567-ST

Mr. Masood Amini
Springtown Gas
909 Bluebell Drive
Livermore, California 94551

SUBJECT: WORK PLAN FOR SITE INVESTIGATION FOR THE PROPERTY
Located at 909 Bluebell Drive, in
Livermore, California

Dear Mr. Amini:

In accordance with your request, Enviro Soil Tech Consultants (ESTC) has prepared the attached work plan to perform an environmental site assessment at your facility. The plan is intended to describe the objectives and procedures that we propose in order to develop an assessment of site conditions, as requested by the Alameda County Health Care Services Agency-Environmental Health Division (ACHCSA-EHD) in a letter dated September 20, 2006.

File No. 10-93-567-ST

If you have any questions or require additional information, please feel free to contact our office at 408-297-1500 at your convenience.

Sincerely yours,

ENVIRO SOIL TECH CONSULTANTS

FRANK HAMEDI
GENERAL MANAGER

LAWRENCE KOO
C. E. #34928

REGISTERED PROFESSIONAL ENGINEER
LAWRENCE SHUI-SUNG KOO
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CIVIL
STATE OF CALIFORNIA

VICTOR B. CHERVEN, PH. D.
R. G. #3475

ENVIRO SOIL TECH CONSULTANTS 2

WORK PLAN FOR SOIL AND GROUNDWATER INVESTIGATION FOR SPINGTOWN GAS PROPERTY LOCATED AT 909 BLUEBELL DRIVE LIVERMORE, CALIFORNIA

1.0 INTRODUCTION

The Environmental Health Division of the Alameda County Health Care Services Agency, which is the lead agency responsible for regulatory oversight of the investigation and cleanup of environmental contamination resulting from leaks or spills of hazardous substances on private and public property in the County, has requested the owners of the property at 909 Bluebell Drive in Livermore to submit a work plan to assess the magnitude and extent of petroleum contamination beneath the site. The property is owned by Mr. Masood Amini, who retained ESTC in November 17, 2006 to prepare the requested plan.

The request for this work plan stems from an earlier investigation by the firm of H_2OGEOL in June 2005, in which petroleum products were detected in the soil and in one groundwater sample. The samples were collected during the removal of petroleum dispensers and piping that had been connected to underground fuel storage tanks. The tanks had been removed and replaced with double-walled tanks on December 1993, and it was deemed that no further action was required at that time. However, during the replacement of the dispensers and piping, demolition of old buildings and replacement with new structures, residual contamination was discovered in the vicinity of the dispensers and piping, prompting the Environmental Health Division to request further investigation.

The site is located at the intersection of Springtown Boulevard and Bluebell Drive (Figure 1). The site is located in the mixed commercial and residential neighborhood.

2.0 PREVIOUS INVESTIGATION

Figure 2 is a blow-up of the area where the underground storage tanks and dispensers were located. The map has been revised slightly from the one prepared by H_2OGEOL in June 2005 and which was included in that company's report entitled "Report on Dispenser and Fuel Pipeline Sampling—Springtown Gas". The tanks were located at the east end of the dispenser island complex.

Six soil samples were collected below dispenser islands, at depths ranging from 0.5 feet to 7 feet. These samples are labeled SG/1-2 through SG/7-8 in Table 1. Six samples were also collected beneath the product piping; these samples are labeled SG/PL1 through SG/PL5 in Table 1. Most of these samples were collected within 6 inches of the base of the gravel in the piping trench. In addition, a small pit was excavated beneath dispenser number 1 and 2, and samples were collected at the south corner (SG/SCor1-2/6Ft.) and north corner (SG/NCor1-2/6Ft) of the pit. Groundwater entered the pit, and a sample was collected for laboratory analysis (SG/PL1-1-2/GW).

Beneath dispenser number 1 and 2, gasoline and diesel fuel were detected at 0.5 feet and 3 feet. The maximum concentration of Total Petroleum Hydrocarbons in the diesel range was 1600 milligram per kilogram (mg/Kg), and the maximum concentration in the gasoline range was 200 mg/Kg. The gasoline oxygenates Methyl Tertiary Butyl Ether and Tertiary Butanol (MTBE and TBA) were also detected in these samples.

No hydrocarbons were detected in the sample beneath dispenser number 3 and 4.

Beneath dispenser number 5 and 6 and dispenser number 7 and 8, two hydrocarbons were detected. MTBE (0.490 mg/Kg and 0.038 mg/Kg, respectively) and TBA (8.4 mg/Kg and 0.4 mg/Kg, respectively). Other gasoline compounds were below the detection limit.

Similar results were obtained beneath the product piping. TPHg and TPHd were below the detection limit, as were all of the volatile aromatic hydrocarbons (Benzene, Toluene, Ethylbenzene, and Total Xylenes: BTEX). Only MTBE and TBA were found, at concentrations ranging from 0.0089 to 7.6 mg/Kg. The only sample that exhibited higher concentrations was SG/PL5/0.5Ft, which was located adjacent to the former storage tank cavity. TPHd and TPHg were detected in that sample at 1.7 and 3.4 mg/Kg, respectively, and MTBE and TBA were detected at 4.2 and 120 mg/Kg. H_2OGEOL speculated that these higher concentrations were due to vapor diffusion from the tank pit.

Because there was evidence of hydrocarbons beneath dispenser 1 and 2, this area was excavated to a depth of 7 feet and the contaminated soil was removed and stockpiled. Three additional samples were collected, one in the center and one at the north and south corners of this excavation. No hydrocarbons were detected in the samples from the center and south corner, confirming that the contaminated soil had been removed in that portion of the pit. TPHg, TPHd, MTBE, and TBA were detected in the north corner. The TPHg and TPHd concentrations were low (4.2 and 150 mg/Kg, respectively), as were the oxygenate concentrations (0.080 and 0.046 mg/Kg, respectively). The water sample also had low concentrations: 0.1 milligram per liter (mg/L) [100 microgram per liter (µg/L)] TPHd, 0.089 mg/L TPHg, 0.062 mg/L MTBE, 0.020 mg/L TBA, and 0.00074 mg/L Tertiary Amyl Methyl Ether (TAME).

3.0 PROPOSED SCOPE OF WORK

The information obtained during the dispenser and product line removal work indicates that there has been a release of gasoline, and possibly diesel fuel that has impacted the soil, at least at very shallow depths of 1-5 feet. Three of four samples below 6 feet did not contain detectable concentrations of petroleum hydrocarbons, so it is possible that the vertical extent of the impact is very limited. Laterally, it appears possible that the impact extends beyond the dispenser island area, because samples beneath three of the four dispensers contained MTBE and TBA, at a minimum.

In order to assess the lateral and vertical extent of the impact, we propose to install seven to eight soil borings around the perimeter of the new dispenser enclosure and underground tank facility. The borings will be located in relatively straight lines through the samples collected by H_2OGEOL, so that a series of cross sections through the area can be constructed (Figure 3). Samples will be collected for laboratory analysis at depths of 1, 6, 11, and 16 feet so that hydrocarbon isocontour maps can be constructed at the depths at which the dispenser samples were collected, as well as at deeper depths. If visual or olfactory evidence of hydrocarbons is observed in the samples, the borings will be continued to a depth of 10 feet below the last evidence of contamination.

The borings will be drilled with a trailer-mounted direct-push (Geoprobe) drilling rig and soil samples will be collected in continuous polyethylene tubes for examination and lithologic description. A sample bailer will be lowered through temporary casing to collect a water sample from each boring prior to backfilling with cement grout (see SOP in Appendix "B"). Groundwater entered the dispenser excavation when the pit was deepened to 6 feet, so we expect to encounter groundwater at a depth of 10 feet or less. Minimum drill cuttings will be generated, and minimum waste handling will be necessary (see SOP in Appendix "B").

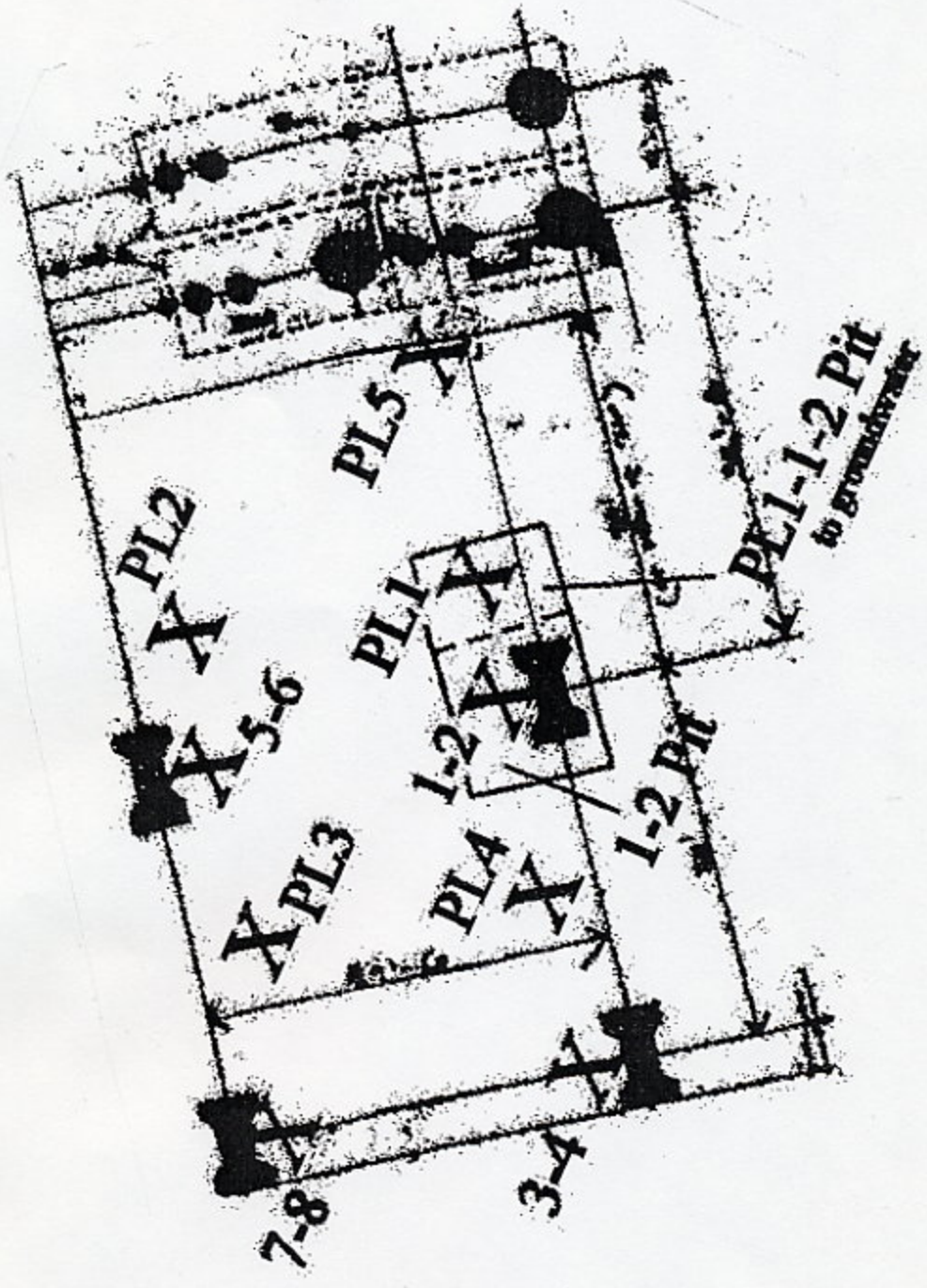
The samples will be analyzed at a state-certified laboratory. EPA method 8015 will be used to detect Total Petroleum Hydrocarbons (TPHg and TPHd). EPA method 8260 will be used to detect volatile aromatic hydrocarbons (BTEX), gasoline oxygenates, and lead scavengers (EDB and 1,2-DCA). The samples will be analyzed on standard 2-week turnaround.

Upon completion of all field and laboratory work, a registered California geologist will analyze the data and prepare a report.

A P P E N D I X "A"

FIGURES

Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/27/2006	Figure 2 Expanded Tank & Dispenser Map



Legend

X = Soil Sample

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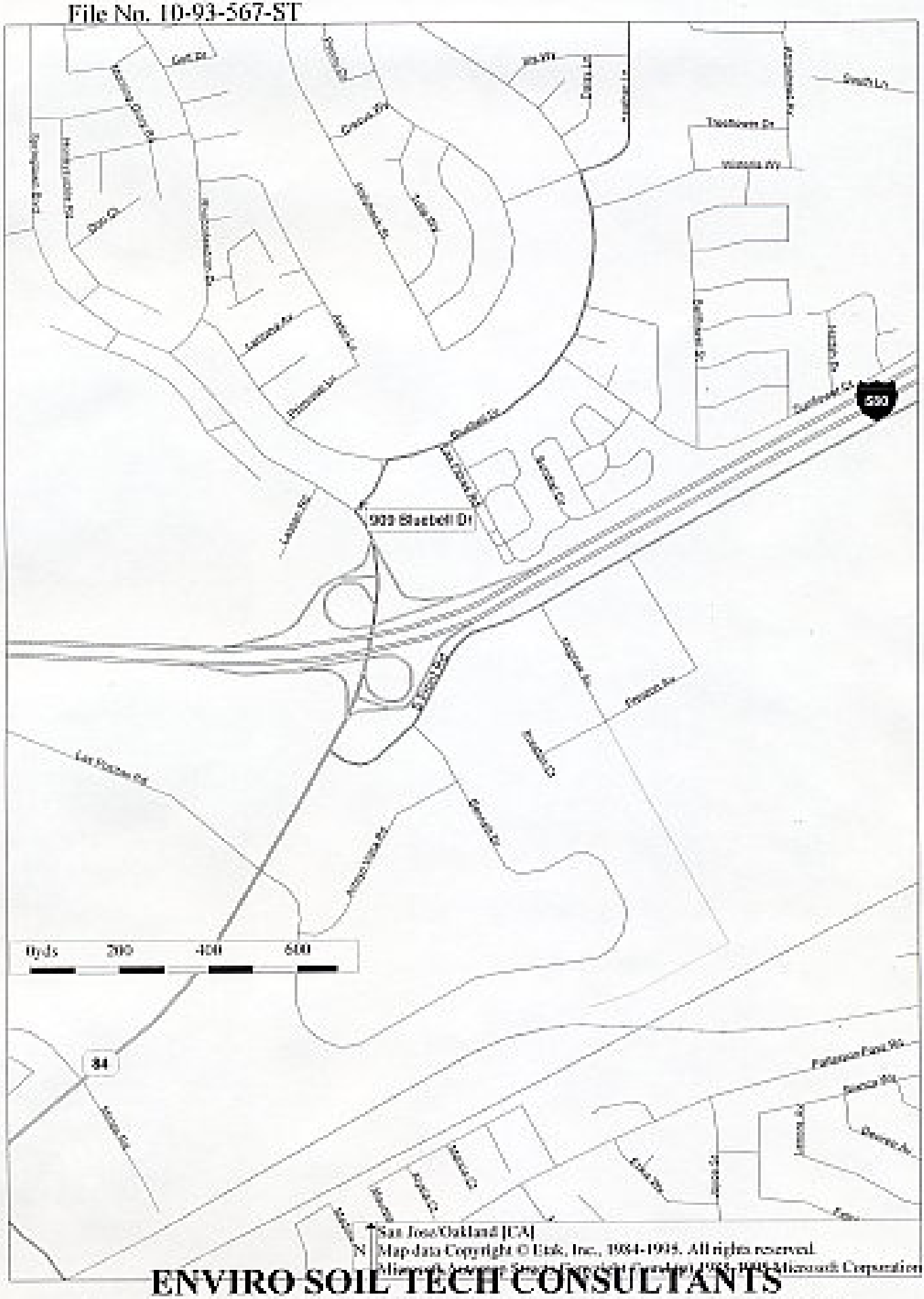

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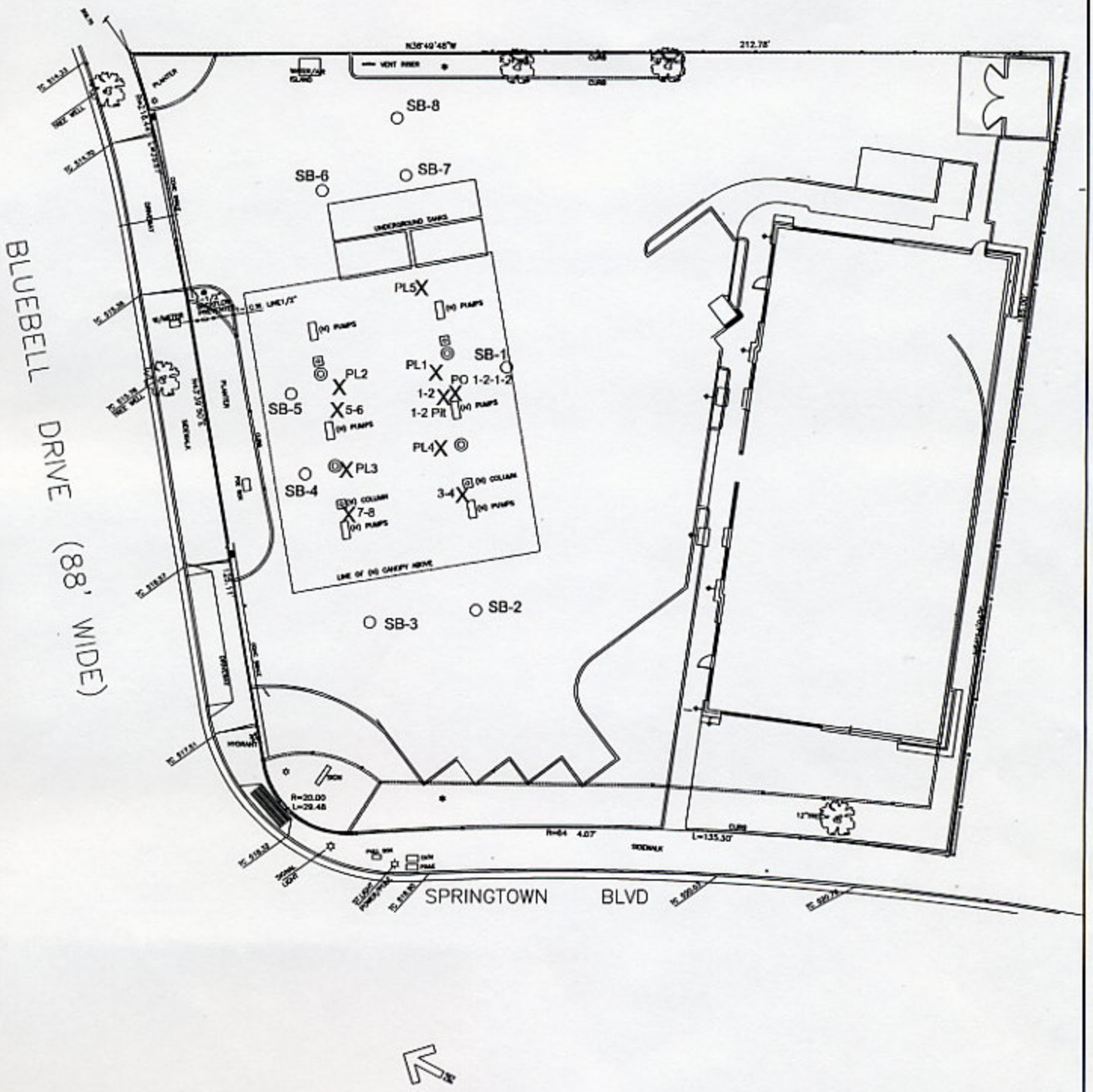
Figure 1

M1

Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/27/2006	Figure 3 **Proposed Borings**



Legend

○ = Proposed Soil Boring
X = Soil Sample

Scale

0 10 20
5 15

M3

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A P P E N D I X "B"

STANDARD OPERATION PROCEDURES

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DRILLING AND SOIL SAMPLING PROCEDURE

A direct push technology (Geoprobe) tool will be used in drilling the soil borings to the desired depths.

Prior to drilling, all drilling equipment will be thoroughly steam-cleaned to minimize the possibility of cross-contamination and/or vertical migration of possible contaminants.

In addition, sampling equipment will be washed between samples with Tri-sodium Phosphate (TSP) solution or an equivalent EPA-approved detergent followed by a rinse in distilled water.

During the drilling operation, undisturbed soil samples will be taken from the required depth by forcing a 2-inch sampler lined with polyethylene or brass tubes driven into undisturbed sediments at the bottom of the borehole by means of hydraulic push technologies.

The selected sampling tubes will be immediately trimmed, the ends covered tightly with aluminum foil and plastic caps, sealed with tape labeled, placed in a plastic bag and stored in a cold ice chest in order to minimize the escape of any volatile present in the samples. Soil samples will be sent to a state-certified hazardous waste laboratory for analysis accompanied by a chain-of-custody record.

Soil samples collected at each sampling interval will be inspected for any possible contamination (odor or peculiar colors). Soil vapor concentrations will be measured in the field by using a Photoionization Detector (PID), Photovac Tip Air Analyzer. The soil sample will be sealed in a Zip-Loc plastic bag and placed in the sun to enhance volatilization of the hydrocarbons from the sample. The purpose of this field analysis is to qualitatively determine the presence or absence of hydrocarbons and to establish which soil samples will be analyzed at the laboratory. The data will be recorded on the drilling log at the depth corresponding to the sampling point.

Other soil samples may be collected to document the stratigraphy and estimate relative permeability of the subsurface materials.

Soil tailings that are obtained during drilling will be stored at the site, pending the analytical test results to determine proper disposal.

GROUNDWATER SAMPLING

Prior to collection of groundwater samples, all of the sampling equipment (i.e. bailer or tubing) were cleaned by pumping TSP water solution followed by distilled water.

Temporary well casings were installed in the borings for the purpose of groundwater sampling. The wells were bailed or pumped to remove four to ten well volumes or until the discharged water temperature, conductivities and pH stabilized. "Stabilized" is defined as three consecutive readings within 15% of one another.

The groundwater sample was collected when the water level in the well recovered to 80% of its static level.

Forty milliliter (ml.) glass volatile organic analysis (VOA) vials with Teflon septa and 1 liter amber glass bottle were used as sample containers. The groundwater sample was being decanted into each VOA vial in such a manner that there was a meniscus at the top. The cap quickly was placed over the top of the vial & bottle and securely tightened. The VOA vial and glass bottle were then be inverted and tapped to see if air bubbles are present. If none is present, then the sample was labeled and refrigerated for delivery under chain-of-custody to the laboratory. The label information has included a sample identification number, job identification number, date, time, type of analysis requested and the sampler's name.

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Environmental & Geotechnical Consultants
151 TULLY ROAD, SAN JOSE, CALIFORNIA 95111
Tel. (408) 292-1500 Fax: (408) 292-2116

File No._____

Date_____

By_____

Job_____

Site Description_____ (continued on reverse side)

Type of Drill Rig_____ Hole Diameter_____

(NOTE: WATER LEVEL, TIME, DATE AT END OF LOG, CAVING, ETC...)

Sample Quality	Blows/6-inch	Sample Loc. No.	Depth		Soil Classification	Penetrometer
			1			
			2			
			3			
			4			
			5			
			6			
			7			
			8			
			9			
			10			
			11			
			12			
			13			
			14			
			15			
			16			
			17			
			18			
			19			
			20			
			21			
			22			

CHAIN OF CUSTODY RECORD

PROJ. NO.	NAME					CON-TAINER	ANALYSES REQUESTED (2)						REMARKS
SAMPLERS: (Signature)													
NO.	DATE	TIME	SOIL	WATER	LOCATION								

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	

SOIL05

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Tel: (408) 297-1508 Fax: (408) 502-2116

File No. 10-93-567-ST

A P P E N D I X "C"

OUTLINE OF DRUM HANDLING PROCEDURES

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File No. 10-93-567-ST

OUTLINE OF DRUM HANDLING PROCEDURES FOR THE PROPERTY LOCATED AT 909 BLUEBELL DRIVE LIVERMORE, CALIFORNIA

1. Test material per site-specific test requirements.
2. Classify Material as : Clean/Non-Hazardous.
3. Labeling of Drums:

   * Pending Label: Used to describe material pending final analytical testing. Labels must be immediately affixed to drum during field work.

   * Non-Hazardous Label: Required within 24 hours after analytical results are received.

   * Hazardous Label: Required within 24 hours after analytical results are received.

   * For Pick-Up Label: Must be affixed to drum prior to arrange pick-up date by certified hauler.

4. Remove within 21 days of generation. Empty drums, where material was disposed in bulk, must be removed the same day they are emptied.

5. Disposal of Material:

   * Clean: Any local landfill.

   * Non-Hazardous: Class III Landfill.

   * Hazardous: Class I landfill.

6. Manifests may be signed by the on-site contractor or consultant, owner, or other authorized representatives. The transporter should not sign the manifest.

   It is the responsibility of the contractor, consultant and owner to arrange for a person to sign the manifest on the day of pick-up.

7. Reporting:

   Reports shall include the following:

   * Completed soil and water work sheets.

   * Copy of the analytical results.

   * State how and where material was disposed.

   * If drums are emptied and material was disposed of in bulk, state how empty drums were handled.

   * The signed blue and yellow copies of the hazardous waste manifest.

SOIL:

1. Test Requirements and Methods: Per STE site-specific test requirements.

   * TPH: EPA Method 8015.

   * BTEX: EPA Method 8020.

   * TOG: 503 D&E.

   * Lead:

     - Total Lead - EPA Method 7421.

     - Inorganic (soluble) Lead: DOS Title 22, Waste Extraction Test, 22-66700.

     - Organic - EPA Method 8240.

   * Ignitable:

2. Classification:

   * Clean: TPH, BTEX, TOG, VOC and non-detectable (<100 ppm).

   * Non-Hazardous if any are true:

     - TPH less than 1,000 ppm.

     - Lead - Inorganic (soluble) Lead less than 5 ppm (STLC) or less than 100 ppm (TTLC).

       - Organic Lead less than 13 ppm (TTLC).

   * Hazardous if any are true:

     - TPH greater than 1,000 ppm.

     - Lead - Inorganic (soluble) Lead greater than 5 ppm (STLC) or greater than 1,000 ppm (TTLC).

       - Organic Lead greater than 13 ppm (TTLC).

     - Ignitable - If TPH>1,000 ppm, then conduct Bunsen Burner Test.
       - If soil bums vigorously and persistently soils are RCRA D001.

   * VOC - less than 1,000 ppm.

3. Responsibility for Disposal:

   * Clean: Consultant, contractor or owner.

   * Non-Hazardous: Consultant, contractor or owner.

4. Types of Drums: DOT-17H for a solid, solidified, or sludge material.

5. Disposal Facility:

   * Clean: Any local landfill.

   * Non-Hazardous: Class III or II landfill.

* Hazardous: Class I landfill.

WATER:

1. Test Requirements and Methods: Per site-specific test requirements.

   * TPH: EPA Method 8015.

   * BTEX: EPA Method 602.

2. Classification:

   * Clean Water: TPH and BTEX non-detectable.

   * Hazardous:

     - Water with dissolved product and detectable TPH and BTEX.

     - Water with free product.

     - Free product only.

3. Responsibility for Disposal:

   * Clean: Consultant/Contractor.

   * Non-Hazardous: Consultant, contractor or owner.

4. Types of Drums: DOT-17C or DOT-17E for liquid or slurry.

5. Disposal Facility:

   * Clean Water: Into sanitary sewer per Local Sewer District approval or into storm sewer with proper approval from Water Board.

   * Non-Hazardous:

     - Water with TPH and BTEX only.

- Water with free product.
- Arrange certified waste hauler to pick and dispose.

* Hazardous:
  - Free product only.
  - Arrange disposal by a certified hazardous waste hauler.

File No. 10-93-567-ST

A P P E N D I X "D"

HEALTH AND SAFETY PLAN

ENVIRO SOIL TECH CONSULTANTS

HEALTH AND SAFETY PLAN
FOR THE PROPERTY
LOCATED AT 909 BLUEBELL DRIVE
LIVERMORE, CALIFORNIA

GENERAL:

This Health and Safety Plan (HSP) contains the minimum requirements for the subject site field work. The field activities include drilling, soil sampling and/or water sampling. All personnel and contractors will be required to strictly adhere with this HSP requirements.

The objective of the HSP plan is describe procedures and actions to protect the worker, as well as unauthorized person, from inhalation and ingestion of and direct skin contact with potentially hazardous materials that may be encountered at the site. The plan describes (1) personnel responsibilities and (2) protective equipment to be used as deemed when working on the site. At a minimum, all personnel working at the site must read and understand the requirements of this HSP. A copy of this HSP will be on-site easily accessible to all staff and government field representatives.

HAZARD ASSESSMENT:

The major contaminants expected to be encountered on the project are gasoline and its hydrocarbon constituents. The anticipated contaminants and their exposure standards are listed in Table 1. It is not anticipated that the potential levels of exposure

will reach the permissible exposure limits (PEL) or threshold limit values (TLV). Inhalation and dermal contact are the potential exposure pathways. Protective clothing will be mandatory for field personnel specified in this Plan. In addition, respiratory protective devices are required to be worn by each person on-site or to be within easy reach should irritating odors be detected or irritation of the respiratory tract occur.

TABLE 1
EXPOSURE LIMITS OF ANTICIPATED CHEMICAL CONTAMINANTS
IN PARTS PER MILLION (ppm)

Contaminant	PEL	EL	ED	CL	TWA	STEL
Benzene*[skin] & [carc]	1	---	---------	---	10	5
Ethylbenzene	100	---	---------	---	100	125
Toluene [skin]	100	200	10 min per 8 hours	500	100	150
Xylene (o, m & p isomers) [skin]	100	200	30 min per 8 hours	300	100	150

PEL - permissible exposure limit: 8 hours, time-weighted average, California Occupational Safety and Health Administration Standard (CAL-OSHA).

EL - excursion limit: maximum concentration of an airborne contaminant to which an employee may be exposed without regard to duration provided the 8 hours time-weighted average for PEL is not exceeded (CAL-OSHA).

ED - excursion duration: maximum time period permitted for an exposure above the excursion limit but not exceeding the ceiling limit (CAL-OSHA).

CL - Ceiling limit: maximum concentration of airborne contaminant which employees may be exposed permitted (CAL-OSHA).

TWA - time-weighted average: 8 hours, [same as threshold limit value (TLV)], American Conference of Governmental Industrial Hygienists (ACGIH).

STEL - Short-term exposure limit: 15 minutes time-weighted average (ACGIH).

[carc] - substance identified as a suspected or confirmed carcinogen.

[skin] - substance may be absorbed into the bloodstream through the skin, mucous membranes or eyes.

* - Federal OSHA Benzene limits given for PEL and STEL; STEL has a 50 minutes duration limit.

A brief description of the physical characteristics, incompatibilities, toxic effects, routes of entry and target organs has been summarized from the NIOSH Pocket Guide to Chemical Hazards for the contaminants anticipated to be encountered. This information is used in on-site safety meetings to alert personnel to the hazards associated with the expected contaminants.

Benzene:

Benzene is a colorless, aromatic liquid. Benzene may create an explosion hazard. Benzene is incompatible with strong oxidizers, chlorine and bromine with iron. Benzene is irritating to the eyes, nose and respiratory system. Prolonged exposure may result in giddiness, headache, nausea, staggering gait, fatigue, bone marrow depression or abdominal pain. Routes of entry include inhalation, absorption, ingestion and skin or eye contact. The target organs are blood, the central nervous system (CNS), skin, bone marrow, eyes and respiratory system. Benzene is carcinogenic.

Ethylbenzene:

Ethylbenzene is a colorless, aromatic liquid. Ethylbenzene may create an explosion hazard. Ethylbenzene is incompatible with strong oxidizers. Ethylbenzene is irritating to the eyes and mucous membranes. Prolonged exposure may result in headache, dermatitis, narcosis or coma. Routes of entry include inhalation, ingestion and skin or eye contact. The target organs are the eyes, upper respiratory system, skin and the CNS.

Toluene:

Toluene is a colorless, aromatic liquid. Toluene may create an explosion hazard. Toluene is incompatible with strong oxidizers. Prolonged exposure may result in fatigue, confusion, euphoria, dizziness, headache, dilation of pupils, lacrimation, insomnia, dermatitis or photophobia. Routes of entry are inhalation, absorption, ingestion and skin or eye contact. The target organs are the CNS, liver, kidneys and skin.

Xylene Isomers:

Xylene is a colorless, aromatic liquid. Xylene may create an explosion hazard. Xylene is incompatible with strong oxidizers. Xylene is irritating to the eyes, nose and throat. Prolonged exposure may result in dizziness, excitement, drowsiness, staggering gait, corneal vacuolization, vomiting, abdominal pain or dermatitis. Routes of entry are inhalation, absorption, ingestion and skin or eye contact. The target organs are the CNS, eyes, gastrointestinal tract, blood, liver, kidneys and skin.

GENERAL PROJECT SAFETY RESPONSIBILITIES:

Key personnel directly involved in the investigation will be responsible for monitoring the implementation of safe work practices and the provisions of this plan are (1) the drilling project supervisor and (2) Enviro Soil Tech Consultants (ESTC) project field engineer. These personnel are responsible for knowing the provisions of the plan, communicating plan requirements to workers under their supervision and regulatory agencies inspectors and for enforcing the plan.

The personnel-protective equipment will be selected to prevent field personnel from exposure to fuel hydrocarbons that may be present at the site. To prevent direct skin contact, the following protective clothing will be worn as appropriate while working at the site:

1. Tyvek coveralls.
2. Butyl rubber or disposable vinyl gloves.
3. Hard hat with optional face shield.
4. Steel toe boots.
5. Goggles or safety glasses.

The type of gloves used will be determined by the type of work being performed. Drilling personnel will be required to wear butyl rubber gloves because they may have long duration contact with the subsurface materials. ESTC sampling staff will wear disposable gloves when handling any sample. These gloves will be changed between each sample.

Personnel protective equipment shall be put on before entering the immediate work area. The sleeves of the overalls shall be outside of the cuffs of the gloves to facilitate removal of clothing with the least potential contamination of personnel. If at any time protective clothing (coveralls, boots and gloves) become torn, wet or excessively soiled, it will be replaced immediately.

Total organic vapors will be monitored at the site with a portable PID. should the total organic vapor content approach that of the threshold limit value (TLV) for any of the substances listed in Table 1, appropriate safety measures will be implemented under the supervision of the site project engineer. These precautions include, but are not limited to, the following: (1) donning of respirators (with appropriate cartridges) by site personnel, (2) forced ventilation of the site, (3) shutdown of work until such time as appropriate safety measures sufficient to insure the health and safety of site personnel can be implemented.

No eating, drinking or smoking will be allowed in the vicinity of the drilling operations. ESTC will designate a separate area on site for eating and drinking. Smoking will not be allowed at the vicinity of the site except in designated areas. No contact lenses will be worn by field personnel.

WORK ZONES AND SECURITY MEASURES:

The project engineer will call Underground Service Alert (USA), and the utilities will be marked before any drilling is conducted on-site, and the borings will be drilled at safe distances from the utilities. The client will also be advised to have a representative

on-site to advise us in selecting locations of borings with respect to utilities or underground structures. Enviro Soil Tech Consultants assumes no responsibility to utilities not so located. The first 5 feet will be hand augered before any drilling equipment is operated.

Each of the areas where the borings will be drilled will be designated as Exclusion Zones. Only essential personnel will be allowed into an Exclusion Zone. When it is practical and local topography allows, approximately 25 to 75 feet of space surrounding those Exclusion Zones will be designated as Contamination Reduction Zones.

Cones, wooden barricades or a suitable alternative will be used to deny public access to these Contamination Reduction Zones. The general public will not be allowed close to the work area under any conditions. If for any reason the safety of a member of the public (e.g. motorist or pedestrian) may be endangered, work will cease until the situation is remedied. Cones and warning signs will be used when necessary to redirect motorists or pedestrians.

LOCATION AND PHONE NUMBERS OF EMERGENCY FACILITIES:

For emergency reasons, the closest facilities addresses and phone numbers are listed below:

City of Livermore Fire Department	911
Valley Memorial Hospital 1111 East Stanley Blvd., Livermore, CA	(925) 447-7000

ADDITIONAL CONTINGENCY TELEPHONE NUMBERS:

Poison Control Center. . . . . .(800) 523-2222

Enviro Soil Tech Consultants Administrative Office. . . . . (408) 297-1500

CHEMTREC. . . . . .(800) 424-9300

NOTE: Only call CHEMTREC stands for Chemical Transportation Emergency Center, a public service of the Chemical Manufacturer's Association. CHEMTREC can usually provide hazard information, warnings and guidance when given identification number or the name of the product and the nature of the problem. CHEMTREC can also contact the appropriate experts.

This Site Safety Plan has been reviewed by the project engineer, EST's field personnel and all subcontractors.

Amendments or modifications to this Plan may be written on a separate page and attached to this Plan. Any amendments or modifications must be reviewed and approved by the personnel name above.

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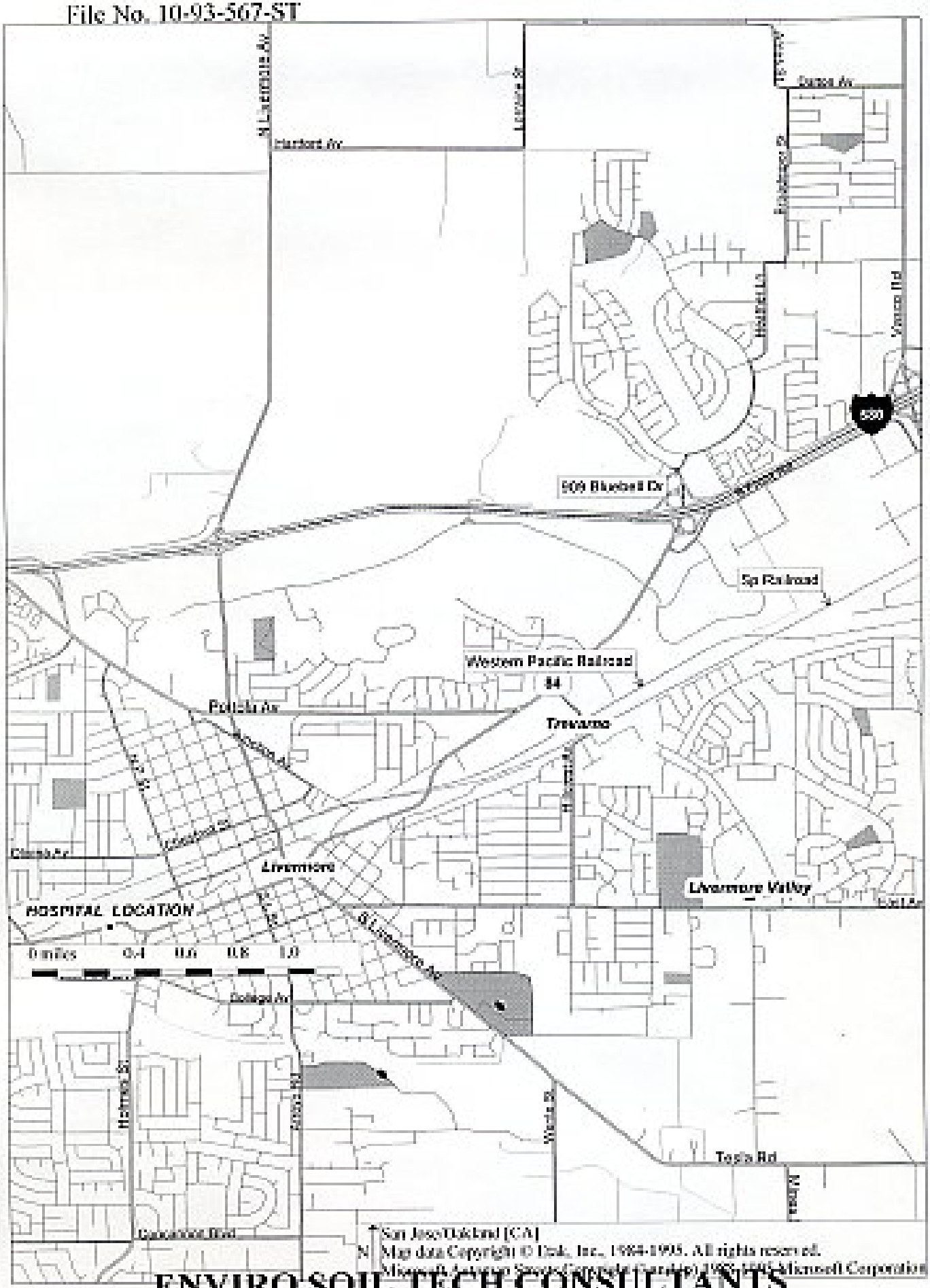

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HSP9

File No. 10-93-567-ST

A P P E N D I X "E"

TYPES OF PROTECTIVE CLOTHING AND RESPIRATION SHOULD BE USED

ENVIRO SOIL TECH CONSULTANTS

TYPES OF PROTECTIVE CLOTHING AND RESPIRATION THAT SHOULD BE USED AT HAZARDOUS WASTE SITES LOCATED AT 909 BLUEBELL DRIVE LIVERMORE, CALIFORNIA

The degree of hazard is based on the waste material's physical, chemical, biological properties and anticipated concentrations of the waste. The level of protective clothing and equipment worn must be sufficient to safeguard the individual. A four category system is described below.

LEVEL A:

Level A consists of pressure-demand SCBA (air supplying respirator with back mounted cylinders), fully encapsulated resistant suit, inner and outer chemical resistant steel safety boots (toe, shank and metatarsal protection), and hard hat. Optional equipment might include cooling systems, abrasive resistant gloves, disposable oversuit and boot covers, communication equipment and safety line. Level A is worn when the highest level of respiratory, skin, and eye protection is required. Most samplers will never wear Level A protection.

LEVEL B:

Level B protection is utilized in areas where full respiratory protection is warranted, but a lower level of skin and eye protection is sufficient (only a small area of head and neck is exposed). Level B consists of SCBA, splash suit (one or two piece) or disposable chemical resistant coveralls, inner and outer chemical resistant gloves, chemical

resistant safety boots, and hard hat with face shield. Optional items include glove and boot covers and inner chemical resistant fabric coveralls.

LEVEL C:

Level C permits the utilization of air-purifying respirators. Level B body, foot and hand protection is normally maintained. Many organizations will permit only the use of approved full-face masks equipped with a chin or harness-mounted canister. However, many sites are visited by personnel wearing a half-mask cartridge respirator.

LEVEL D:

Level D protection consists of a standard work uniform of coveralls, gloves, safety shoes or boots, hard hat and goggles or safety glasses.

Two basic types of respirators are air-purifying and air-supplying. Air-purifying respirators are designed to remove specific contaminants by means of filters and/or sorbents. Air-purifying respirators come in various sizes, shapes and models, and can be outfitted with a variety of filters, cartridges and canisters. Each mask and cartridge or canister is designed for protection against certain contaminant concentrations. Just because a cartridge says it is for use against organic vapors does not mean that it is good for all organic vapors.

Air-supplying respirators are utilized in oxygen-deficient atmospheres (less than 19.5 percent) or when an air-purifying device is not sufficient. air is supplied to a face-mask from an uncontaminated source of air via and air line from stationary tanks, from a compressor or from air cylinders worn on the back (SCBA). Rated capacities of the

SCBA's are normally between 30 and 60 minutes. Only positive pressure (pressure demand) respirators should be used in high concentration hazardous environments.

Respirators often malfunction during cold weather or after continued use. Only NIOSH (National Institute for Occupational Safety and Health) and MSHA (Mine Safety and Health Administration) approved respirators should be used.

Contact lenses are not permitted for use with an respirator. Contact lenses should not be worn at any site since they tend to concentrate organic materials around the eyes; soft plastic contact lenses can absorb chemicals directly. In addition, rapid removal of contact lenses may be difficult in an emergency. Since eye glasses can prevent a good seal around the temple when wearing goggles or full face masks, spectacle adapters are available for masks and goggles.

File No. 10-93-567-ST

A P P E N D I X "E"

REGULATORY AGENCY'S DOCUMENT

ENVIRO SOIL TECH CONSULTANTS

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
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September 20, 2006

Masood and Amini Sharbano
Springtown Gas
909 Bluebell Drive
Livermore, CA 94551-1419

Subject: Fuel Leak Case No. RO0002894, Springtown Gas, 909 Bluebell Drive, Livermore, CA –

Dear Masood and Amini Sharbano:

In correspondence dated November 3, 2005, Alameda County Environmental Health (ACEH) requested a Work Plan for soil and water investigation at the above-referenced site by January 17, 2006. We reiterated our request for a Work Plan in correspondence dated March 16, 2006. To date, we have not received a Work Plan or a request for a schedule extension. Your site overlies a sensitive drinking water aquifer, and limited progress has been made toward evaluating potential petroleum hydrocarbon impacts. The lateral and vertical extents of subsurface contamination at the site are undefined. **Your site is out of compliance with directives from this agency**.

In order for your site to return to compliance, please **submit the previously requested Work Plan within 30 days of the date of this letter (by October 20, 2006)**. This date is not an extension of your due date, reports for this site are late and your site is out of compliance. Due to the lack of compliance with ACEH requests, ACEH recommends that the Underground Storage Tank Cleanup Fund not reimburse you for work until the site is brought back into compliance.

Please note that we have started the enforcement process on this case by requesting a revocation of your eligibility to receive grant money from the state's Underground Storage Tank Fund (Senate Bill 2004) to reimburse you for the cost of investigation and cleanup. Further delays in investigation, late reports, or enforcement actions may result in referral of 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.

TECHNICAL REPORT REQUEST

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

- **October 20, 2006** – Work Plan for Soil and Groundwater 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

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.

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

Sincerely,

Jerry Wickham
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

Sunil Ramdass
SWRCB Cleanup Fund
1001 I Street, 17th floor
Sacramento, CA 95814-2828

Shari Knierem
SWRCB Cleanup Fund
1001 I Street, 17th floor
Sacramento, CA 95814-2828

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

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

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. 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.