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2:19 pm, Dec 26, 2007

Alameda County
Environmental Health

SPRINGTOWN GAS
909 BLUEBELL DRIVE
LIVERMORE, CA 94551

December 18, 2007

Mr. Jerry Wickham
Hazardous Materials Specialist
ACHCSA-EHS
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

SUBJECT: WORK PLAN FOR OFF-SITE GROUNDWATER INVESTIGATION FOR THE PROPERTY
909 Bluebell Drive, Livermore, CA

Dear Mr. Wickham:

Enclosed, please find a copy of the December 17, 2007 subject Off-Site Groundwater Investigation Work Plan prepared by my consultant, Enviro Soil Tech Consultants.

I declare, under penalty of perjury, that the information and/or recommendations contained in this report are true and correct to the best of my knowledge.

Sincerely,

MASOOD AMINI 12/18/07

File No. 10-93-567-ST

WORK PLAN FOR OFF-SITE GROUNDWATER INVESTIGATION FOR THE PROPERTY LOCATED AT 909 BLUEBELL DRIVE LIVERMORE, CALIFORNIA DECEMBER 17, 2007

PREPARED FOR:
MR. MASOOD AMINI FILABADI
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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ENVIRO SOIL TECH CONSULTANTS

Environmental & Geotechnical Consultants

131 TULLY ROAD, SAN JOSE, CALIFORNIA 95111

Tel: (408) 297-1500 Fax: (408) 292-2116

December 17, 2007

File No. 10-93-567-ST

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

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

Dear Mr. Filabadi:

In accordance with correspondence received from Alameda County Health Care Services Agency-Environmental Health Division (ACHCSA-EHD), Enviro Soil Tech Consultants (ESTC) has prepared the attached work plan to continue the environmental site assessment at your facility. The plan is intended to describe the objectives and procedures that we propose in order to evaluate the extent of groundwater contamination north of the property.

File No. 10-93-567-ST
December 17, 2007

Please do not hesitate to call if you have any questions regarding the proposed scope of work.

If you have any questions or require additional information, please feel free to contact our office at 408-297-1500 or via email at infor@envirosoiltech.com.

Sincerely yours,

ENVIRO SOIL TECH CONSULTANTS

REGISTERED GEOLOGIST VICTOR B. CHERVEN No. 3475 STATE OF CALIFORNIA

VICTOR B. CHERVEN, Ph.D.
P[illegible]

LAWRENCE KOO
C. E. #34928

REGISTERED PROFESSIONAL ENGINEER LAWRENCE SHUI-BING KOO C 34928 CIVIL STATE OF CALIFORNIA

FRANK HAMEDI-FARD
GENERAL MANAGER

WORK PLAN FOR OFF-SITE GROUNDWATER INVESTIGATION SPINGTOWN GAS 909 BLUEBELL DRIVE LIVERMORE, CALIFORNIA

1.0 INTRODUCTION

Enviro Soil Tech Consultants (ESTC) completed a preliminary investigation of soil and groundwater contamination at the referenced site in March 2007 and followed this with additional drilling in August. Based on the results of those investigations, the ACHCSA-EHD has requested further investigation north of the site to delineate the extent of impacted groundwater. ACHCSA-EHD has also asked for a pilot test to evaluate the feasibility of potential remediation methods to reduce hydrocarbon concentrations in the vicinity of the underground fuel storage tanks.

2.0 PROPOSED SCOPE OF WORK

TASK 1—SECURE OFF-SITE DRILLING ACCESS

The first task to be undertaken will be to contact property owners to the east and north of the site, including the City of Livermore, to obtain permission to drill. This will require completing an access agreement with the adjacent landowners.

TASK 2—LOCATE UNDERGROUND UTILITIES IN VICINITY OF PROPOSED BORINGS

After we have negotiated access agreements with affected neighbors, ESTC will contact Underground Services Alert to request notification of the proposed drilling activity. ESTC will mark the proposed drilling locations, and after the locations of buried utility lines have been marked, ESTC will make any necessary adjustments to the locations to avoid the utility lines.

TASK 3—DRILL SIX GEOPROBE BORINGS

We estimate drilling six shallow borings on these adjacent properties, at or near the locations shown in Figure 1. Most of these are located in a vacant lot on the north side of Bluebell Drive, but GP-6 is located in a grassy median strip within this roadway and GP-5 is located in a parking lot east of the site. The borings will be drilled with a direct-push, trailer-mounted drilling rig (Geoprobe®), equipped with translucent polyethylene sample liners. The borings will be drilled to a depth of 20 feet, as in the previous drilling phases, and will be continuously sampled. The core will be screened with a portable photo-ionization detector (PID) to detect any organic (hydrocarbon) vapors, and a field geologist or engineer will log the core on a descriptive boring log. Samples will be taken at 5-foot intervals or at locations where PID readings indicate the presence of hydrocarbons, and will be preserved in a cooled ice chest for possible laboratory analysis. However, based on the distance of the proposed borings from the fuel leak source, we do not expect to encounter much, if any, contaminated soil.

Recent drilling indicates that the normal depth to groundwater is less than 10 feet, so it is anticipated that the borings will encounter groundwater before reaching total depth. Therefore, a length of temporary PVC casing will be lowered into the boring to allow groundwater to accumulate and a disposal bailer will then be lowered into the casing to collect a groundwater sample. The samples will be sealed in 40-ml glass vials, labeled, and preserved in a cooled ice chest for later transport to the testing laboratory.

TASK 4—LABORATORY ANALYSIS

The samples from Task 3 will be analyzed at a state-certified laboratory. EPA method 8015 will be used to detect Total Petroleum Hydrocarbons in the gasoline range (TPH-g). 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. Because Ethanol, Methanol, and Chlorinated Hydrocarbons were not detected in the borings that were drilled closer to the leak source in August 2007, the samples from these more distant borings will not be analyzed for these compounds.

TASK 5—DRILL ADDITIONAL MONITORING WELLS

In order to complete the delineation of the dissolved-phase contaminant plume, we anticipate that ACHCSA-EHD will require the installation of one or more additional monitoring wells downgradient of STMW-1. We have therefore included a provision in this work plan to drill and install at least one well to the north or east of the site. The number and location of the additional well(s) will be determined after the results of the Geoprobe® borings have been reviewed so as to optimize the well locations.

The Geoprobe® rig, equipped with hollow-stem augers, will be used to drill the wells. Drill cuttings and rinseate from the wells will be placed in 55-gallon drums and temporarily stored on site. Soil samples will again be collected continuously for description, but because the intent is to locate the wells beyond the contamination limits, no samples will be analyzed for hydrocarbons unless hydrocarbon odors or staining are evident in the samples.

The wells will be screened from 10 to 20 feet and will be constructed in the same manner as shown in Figure 3 of our May 2007 work plan.

TASK 6—SURVEY MONITORING WELLS

After the new wells have been allowed to stabilize, a licensed surveyor will be retained to survey their locations and the elevations of the well casings. This information will be used to determine the elevation of the piezometric surface and the direction of groundwater flow.

TASK 7—DEVELOP AND SAMPLE MONITORING WELLS

Once the wells have stabilized and the concrete has set, the surge-and-purge method will be used to develop the wells, remove sediment, and tighten the sand pack. Twenty-five to fifty (25-50) gallons of water will be purged from each well before samples are collected.

After the wells are developed, ESTC will conduct the next quarterly monitoring event. All wells will be opened and allowed to recover and equilibrate with atmospheric pressure before the depth to the static water level is measured. The depth will be recorded on the well monitoring sheet, and then a water sample will be collected from each well. The samples will be placed in 40-ml vials, preserved in a cooled ice chest, and transported to a state-certified laboratory.

TASK 8—VAPOR EXTRACTION/GROUNDWATER EXTRACTION FEASIBILITY TEST

ACHCSA-EHD has requested the RP to conduct a pilot test of one or more remedial methods to assess the feasibility of reducing the concentration of Methyl Tertiary Butyl Ether (MTBE) and Tertiary Butanol (TBA) in the vicinity of the underground storage tanks.

Comparison of the combined MTBE/TBA concentrations in soil samples in the unsaturated zone above 10 feet with those in groundwater samples from the saturated zone below this depth indicates that concentrations in the unsaturated zone appear to be higher than those in the saturated zone. For example, the combined concentration at 5 feet in GP-1 is 1,300 parts per billion (Figure 2), whereas the concentration in the water sample from this boring was 171 parts per billion (Figure 3). Closer to the leak source, the concentration at 7 feet in SB-8 was 110,000 ppb, while the concentration in the groundwater was about half this amount (56,000 ppb). These concentrations imply that treating the groundwater would remove a portion of the hydrocarbons but would leave the site vulnerable to continued leaching of hydrocarbons from the unsaturated zone into the saturated zone. Therefore, we propose to conduct a combined test to treat both soil and groundwater. The proposed test will involve soil vapor extraction in combination with groundwater extraction.

TASK 8.1—GROUNDWATER EXTRACTION (INTERIM GROUNDWATER REMEDIATION)

TBA was detected at a concentration of 56,000 parts per billion in boring SB-8 in February 2007, and at a concentration of 6,500 ppb in monitor well STMW-1 in September. It was also detected in STMW-2. MTBE is also present, although at lower concentrations. All of these borings are located near the underground storage tanks, as are two other wells that were recently discovered (Figure 1). These wells were apparently installed a few years ago when the storage tanks were replaced, and were probably intended to be used as pressure-release valves in case groundwater were to rise up and begin to submerge the tanks. In that event, the tanks might begin to move or "float", but the wells could be used to lower the water table through pumping. Therefore, these wells are labeled R-1 and R-2 in Figure 1 (for "release" or "remediation").

Wells R-1 and R-2 are reportedly 13 feet deep and are constructed of 4-inch diameter PVC that is screened from 5 to 13 feet below grade, according to the RP. They are located within the backfilled tank cavity, and therefore are not grouted or encased in a sand pack. They are likely to be suitable for interim remediation of groundwater using pump and treat methodology. Therefore, we propose to install groundwater pumps in both wells and begin extracting groundwater for above-ground treatment using granulated activated carbon (GAC) drums or canisters. This task could be performed initially as a feasibility test, and if successful, could be continued until a full Corrective Action Plan has been developed and implemented.

The extracted groundwater would be piped to a holding tank before being run through the GAC. Prior to the start of the test, ESTC will mobilize a 5,000-gallon holding tank to the site to store the extracted water. A submersible downhole pump will be placed in the well and will be hooked to the tank with plastic tubing. A flow meter will be connected in line ahead of the tank to measure the extraction rate. The area between the well and the tank will be cordoned off to prevent vehicular damage.

The extraction test period would be for two weeks but could continue for a longer period if interim remediation is approved. During the first few days of the test, we will adjust the pumping rate periodically to determine what the maximum sustainable pumping rate would be, observe water level drawdown in the test well, and measure any drawdown in the surrounding monitoring wells to estimate the radius of influence of the extraction well at various pumping rates. We will collect water samples from the influent stream so that changes in concentration can be observed over time. We will also collect samples from the effluent stream to determine whether the treatment was successful (due to their higher solubility relative to BTEX, MTBE and TBA are difficult to remove by GAC filtration if BTEX concentrations are high because the carbon tends to absorb the BTEX and release the oxygenates. This does not appear to be of great concern at this site, but feasibility testing is still necessary to prove this).

The water samples will be analyzed in a state-certified analytical laboratory for TPHg, BTEX, and gasoline oxygenates using EPA methods 8015MOD and 8260B. After treatment, the water would be piped to a second 5,000-gallon holding tank before being discharged to the sanitary sewer (assuming approval by the City and County).

A process flow diagram of the extraction, treatment system and sampling points is presented on Figure 6 (Appendix "A").

TASK 8.2 DRILL VAPOR EXTRACTION TEST WELL

None of the existing or proposed groundwater monitoring wells is suitable for a vapor extraction test, because none are screened within the unsaturated zone. Therefore, the first proposed task is to drill a 4-inch diameter vapor test well that will be screened

from 3 to 10 feet. The test well will be located next to SB-8, where the highest concentrations were detected in soil. The well will be drilled with a Geoprobe® rig equipped with hollow-stem augers. No soil samples will be collected, because they have already been collected and analyzed in SB-8. Figure 4 illustrates the proposed construction details of the test well.

A second vadose-zone well will be also installed to serve as an observation well during the test. It will have the same construction as the test well, and will be located approximately 20 feet from it (Figure 1).

TASK 8.3 MOBILIZE A SOIL VAPOR EXTRACTION UNIT AND INSTALL PIPING

After the test and observation wells have been constructed, a trailer-mounted internal combustion (IC) gasoline-driven engine vapor extraction unit will be mobilized to the site. To minimize noise and site disruption, the IC engine will likely be located on the east side of the station building.

The IC engine will then be connected to the extraction well with temporary above-ground PVC piping and the necessary fittings and valves. The area between the extraction well and the engine will be cordoned off to prevent motorists from driving over the piping during the test. An inlet sampling port will be inserted into the piping ahead of the engine so that vapor concentrations in the inlet stream can be measured and samples can be collected.

Exhaust from the IC engine (carbon dioxide and water) will be vented to the atmosphere. It is likely that this will require a temporary permit from the Bay Area Air Quality Management District (BAAQMD). An exhaust sampling port in the exhaust stack will make it possible to collect samples to demonstrate that hydrocarbon vapors have been destroyed by the IC engine. A Process Diagram of the I.C. Engine is shown on Drawing VET-2 (Appendix "A").

TASK 8.4 CONDUCT 8-HOURS SVE TEST

We estimate conducting an 8-hour extraction test. This length of test is adequate at many sites, especially where the soil is permeable and observation wells are located close to the extraction well. Magnehelic gauges will be placed on the extraction and observation wells to measure the induced vacuum caused by vapor withdrawal from the test well. This will help to estimate the effective radius of influence of vapor extraction wells.

TASK 8.5 MEASURE VAPOR CONCENTRATIONS AND COLLECT VAPOR SAMPLES

During the test, a portable photo-ionization detector (PID) and vacuum pump will be used to sample the inlet vapor stream and measure hydrocarbon vapor concentrations. The vacuum pump will be connected to the sample port, and the outlet line from the pump will be inserted into a tedlar sample bag until it is filled. The pump will then be removed and the PID will be inserted into the bag's sample port to obtain a reading. Readings will be taken at approximately 1-hour intervals during the test to measure concentration changes over time. The initial and final samples will be preserved and transmitted to the laboratory for analysis so that PID data can be compared to laboratory readings.

In addition to vapor readings, the field technician will take periodic measurements of induced vacuum at the test and observation wells and will note engine rpm's and air flow rate using gauges on the extraction unit. These readings will be recorded on the field data sheet.

TASK 8.6 ANALYZE VAPOR SAMPLES

The vapor samples will be analyzed in a state-certified analytical laboratory for TPHg, BTEX, and MTBE using EPA methods 8015 and 8020.

3.0 REPORT

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

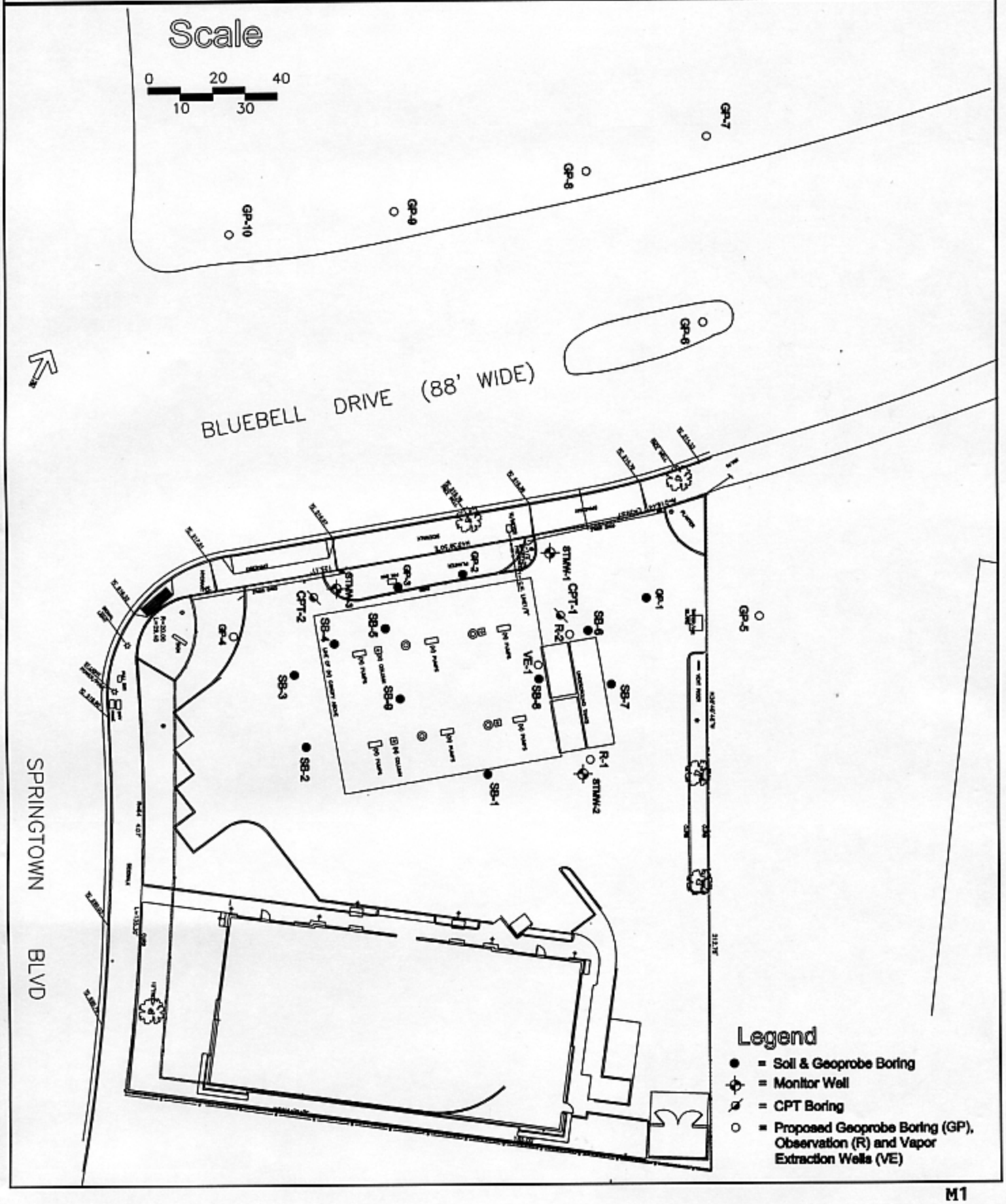
File No. 10-93-567-ST
December 17, 2007

A P P E N D I X "A"

FIGURES

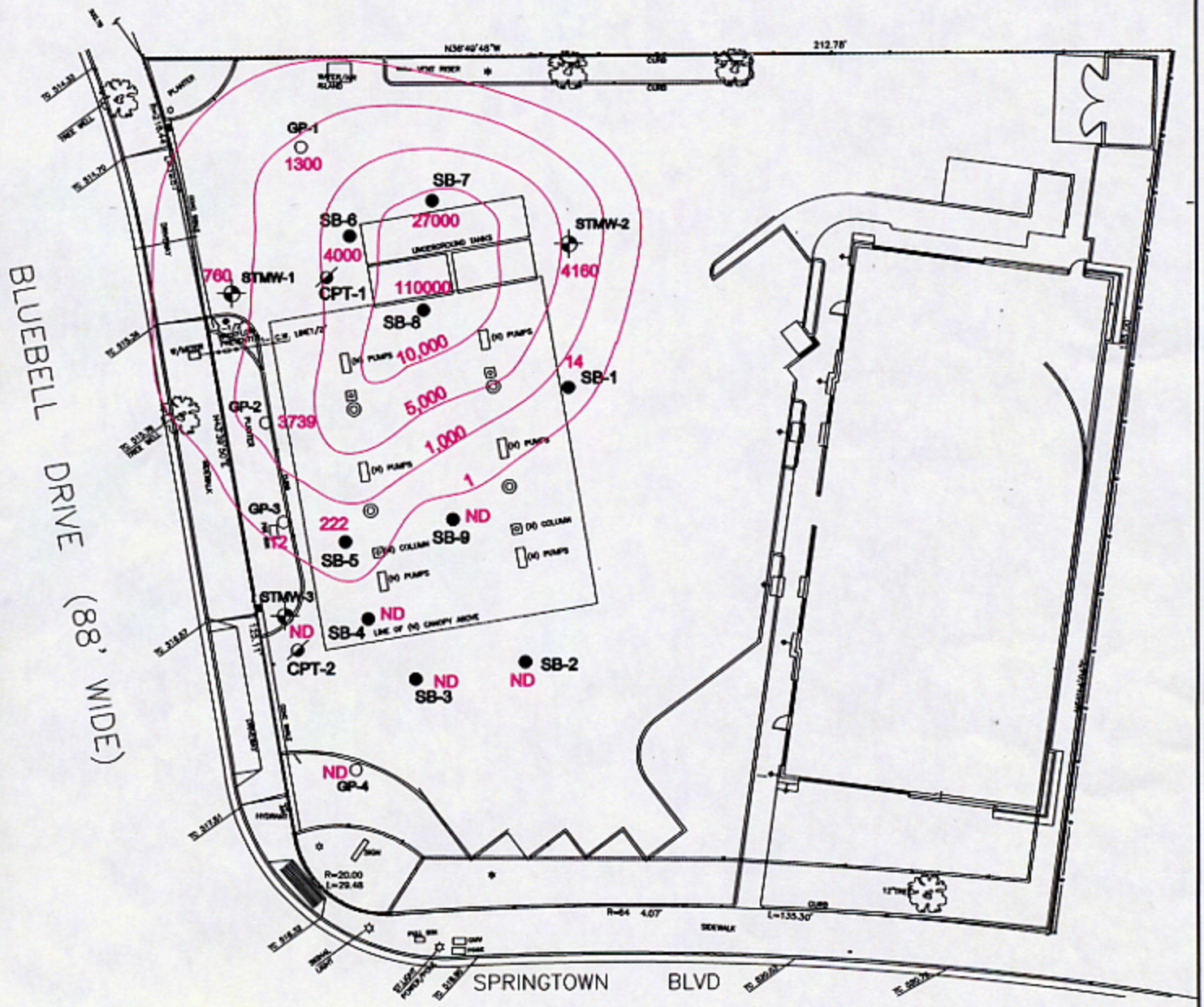
ENVIRO SOIL TECH CONSULTANTS

Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/20/2007	Figure 1 Site Map



M1

Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/4/2007	Figure 2 **Isocontours of Highest MTBE & TBA in Soil @ 5-10 feet**



Legend

- ● = Soil Boring
- ○ = Geoprobe Boring
- ⌖ = Monitor Well
- ⌖ = CPT Boring

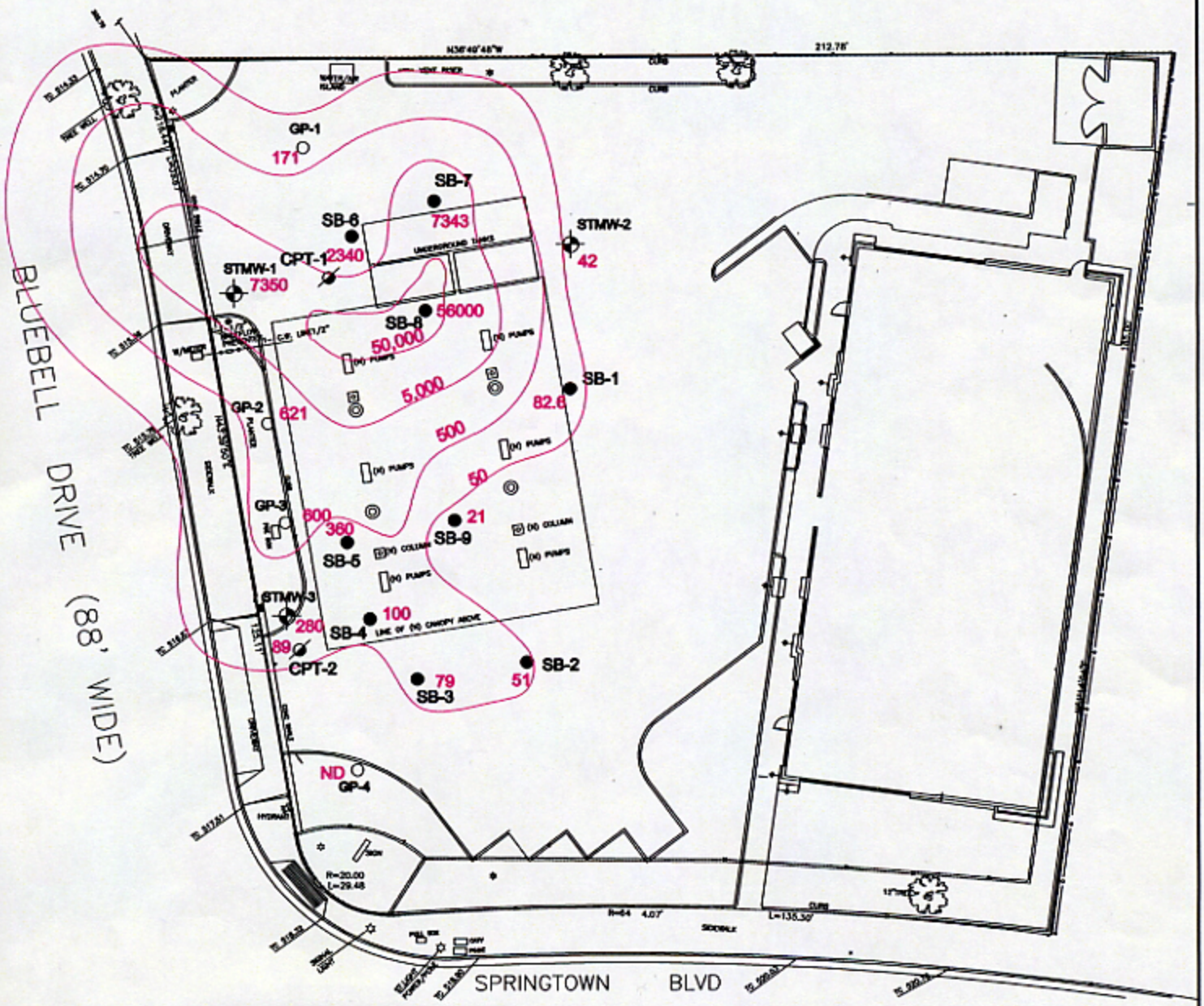
Isocontours are Variable in ug/kg

Scale

0 5 10 15 20

M2

Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/4/2007	Figure 3 **Isocontours of MTBE & TBA in Groundwater for all 2007 Samples**



Legend

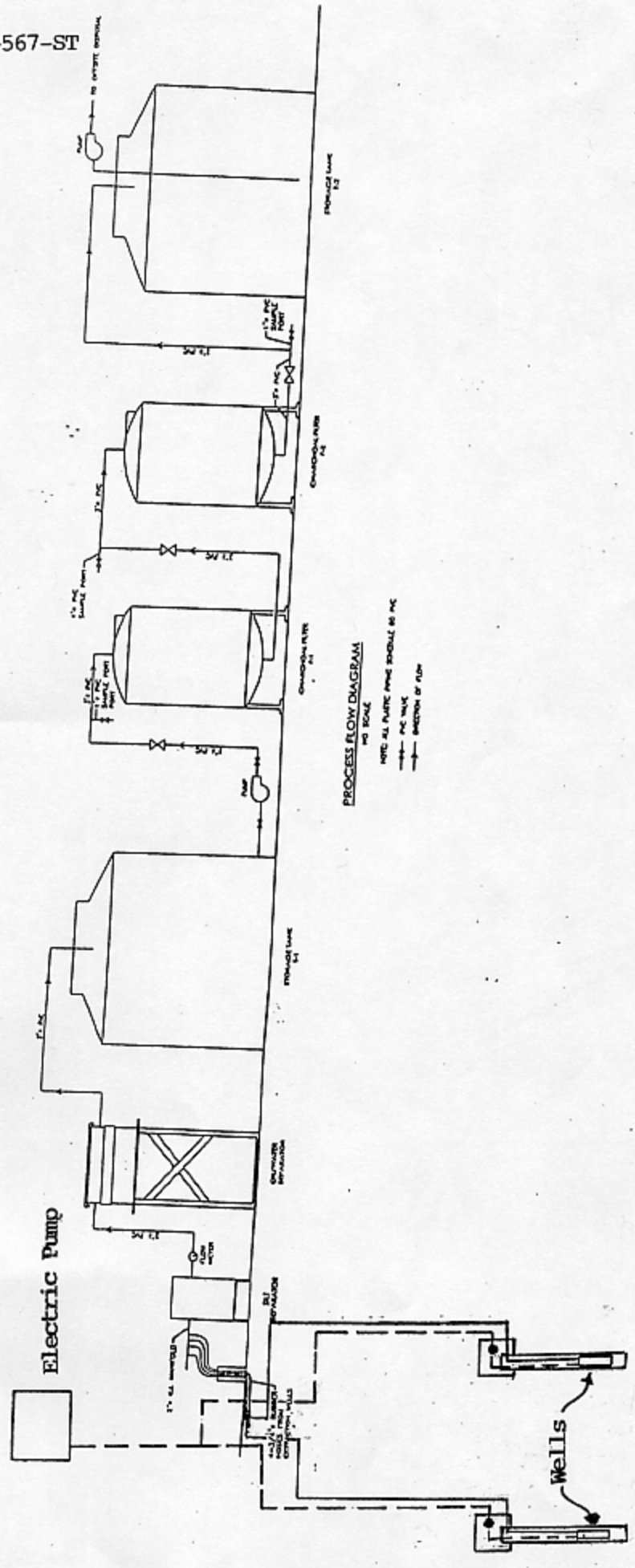
- ● = Soil Boring
- ○ = Geoprobe Boring
- ⌖ = Monitor Well
- ⌀ = CPT Boring

Isocontours are Variable in ug/L

Scale

0 10 20
5 15

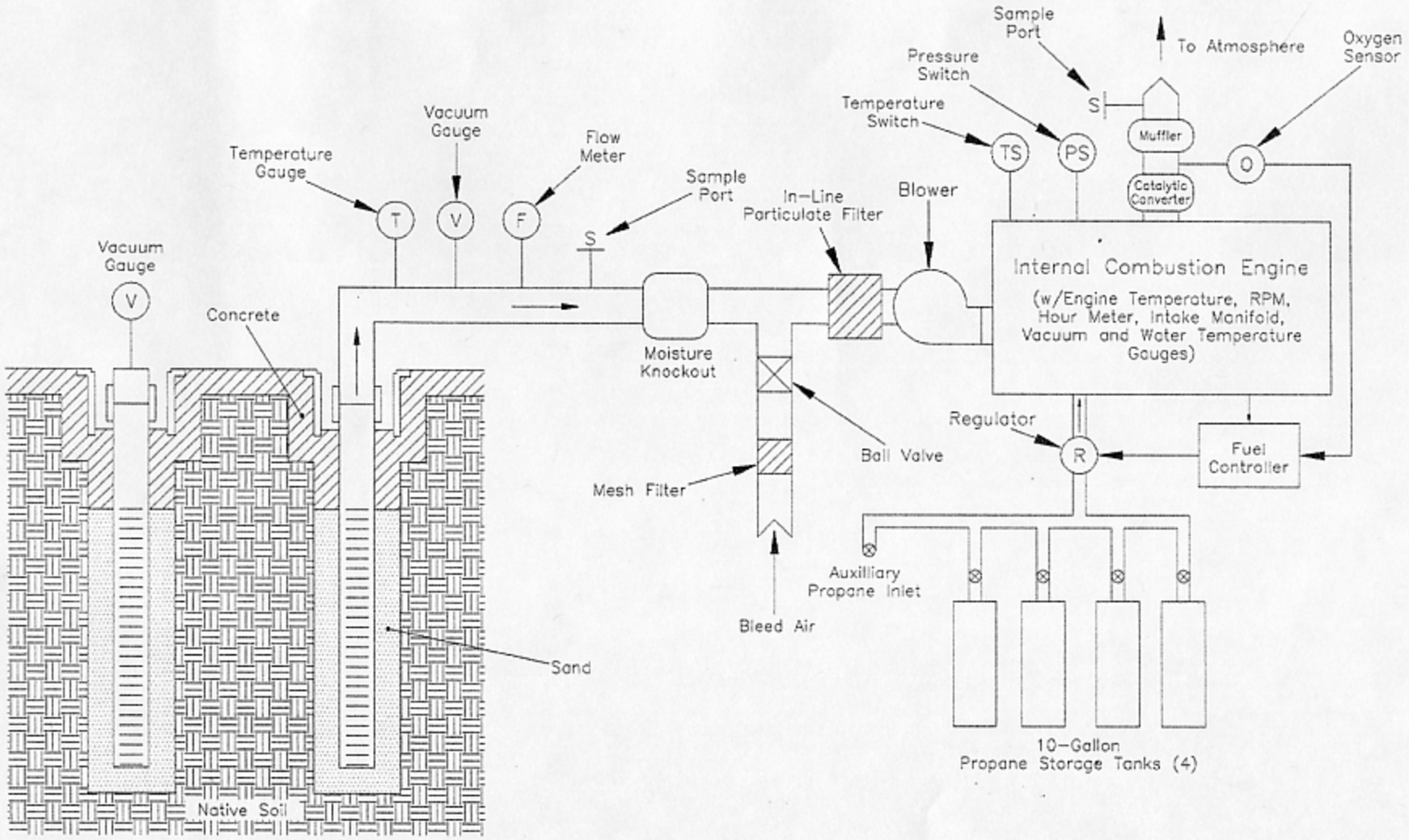
M3



PROCESS FLOW DIAGRAM

Figure 6

ENVIRO SOIL TECH CONSULTANTS



CEECON
CALIFORNIA ENVIRONMENTAL ENGINEERS & CONTRACTORS

Drawing: VET-2 Date: 12/06/07

Vapor-Extraction Internal Combustion Engine Process Flow Diagram

File No. 10-93-567-ST

M7

File No. 10-93-567-ST
December 17, 2007

A P P E N D I X "B"

ATTACHMENT A

ENVIRO SOIL TECH CONSULTANTS

ATTACHMENT A
STANDARD FIELD PROCEDURES
FOR GEOPROBE@ SAMPLING

DECRIPTION:

This document describes ESTC's standard field methods for Geoprobe soil and groundwater sampling. These procedures are designed to comply with Federal, State and Local regulatory guidelines. Specific field procedures are summarized below:

OBJECTIVE:

Soil samples are collected to characterize subsurface lithology, assess whether the soils exhibit obvious hydrocarbon or other compound vapor odor or staining, estimate groundwater depth and quality and to submit samples for chemical analysis.

SOIL CLASSIFICATION/LOGGING:

All soil samples are classified according to the Unified Soil Classification System by a trained geologist or engineer working under the supervision of a California Registered Geologist (RG) or Civil Engineer (CE). The following soil properties are noted for each soil sample:

- Principal and secondary grain size category (i.e. sand silt, clay or gravel).
- Approximate percentage of each grain size category.
- Color.
- Approximate water or separate-phase hydrocarbon saturation percentage.

- Observed odor and/or discoloration.
- Other significant observation (i.e. concentration, presence of marked horizon, mineralogy) and estimated permeability.

SOIL SAMPLING:

Geoprobe soil samples are collected from borings driven using hydraulic push technologies. A minimum of one and one-half feet of the soil column is collected for every five feet of drilled depth. Additional soil samples can be collected near the water table and at lithologic changes. Samples are collected using samplers lined with polyethylene or brass tubes driven into undisturbed sediments at the bottom of the borehole. The ground surface immediately adjacent to the boring is used as a datum to measure sample depth. The horizontal location of each boring is measured in the field relative to a permanent on-site reference using a measuring wheel or tape measure.

Drilling and sampling equipment is steam-cleaned or washed prior to drilling and between borings to prevent cross-contamination. Sampling equipment is washed between samples with trisodium phosphate or an equivalent EPA-approved detergent.

SAMPLE STORAGE, HANDLING AND TRANSPORT:

Sampling tubes chosen for analysis are trimmed off excess soil and capped with aluminum foil, Teflon tape and plastic end caps. Soil samples are labeled and stored at or below 4° C on either crushed or dry ice, depending upon local regulations. Samples are transported under chain-of-custody to a State-certified analytic laboratory.

FIELD SCREENING:

After a soil sample has been collected, soil from the remaining tubing is placed inside a sealed plastic bag and set aside to allow hydrocarbons to volatilize from the soil. After ten to fifteen minutes, a portable GasTech or photoionization detector measures volatile hydrocarbon vapor concentrations in the bag's headspace, extracting the vapor through a slit in the plastic bag. The measurements are used along with the field observations, odors, stratigraphy and groundwater depth to select soil samples for analysis.

GRAB GROUNDWATER SAMPLING:

Groundwater samples are collected from the open borehole using bailers, advancing disposable Tygon tubing into the borehole and extracting groundwater using a diaphragm pump, or using a hydro-punch style sampler with a bailer or tubing. The groundwater samples are decanted into the appropriate containers supplied by the analytic laboratory. Samples are labeled, placed in protective foam sleeves, stored on crushed ice at or below 4°C, and transported under chain-of-custody to the laboratory.

DUPLICATES AND BLANKS:

Blind duplicate water samples are usually collected only for monitoring well sampling programs, at a rate of one blind sample for every 10 wells samples. Laboratory supplied trip blanks accompany samples collected for all sampling programs to check for cross-contamination caused by sample handling and transport. These trip blanks are analyzed if the internal laboratory quality assurance/quality control (QA/QC) blanks contain the suspected field contaminants. An equipped blank may also be analyzed if non-dedicated sampling equipment is used.

GROUTING:

If the borings are not completed as wells, the borings are filled to the ground surface with cement grout poured or pumped through a tremie pipe.

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December 17, 2007

A P P E N D I X "C"

STANDARD OPERATION PROCEDURES

ENVIRO SOIL TECH CONSULTANTS

File No. 10-93-567-ST
December 17, 2007

DRILLING AND SOIL SAMPLING PROCEDURE

A direct push technology (Geoprobe) tool will be used in drilling 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 bass 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.

ENVIRO SOIL TECH CONSULTANTS

Environmental & Geotechnical Consultants
131 TULLY ROAD, SAN JOSE, CALIFORNIA 95111
Tel. (408) 297-1500 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			
			0			
			1			
			2			
			3			
			4			
			5			
			6			
			7			
			8			
			9			
			0			
			1			
			2			

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MONITORING WELL INSTALLATION

The boreholes for the monitoring wells will be drilled with Geoprobe equipment insert with hollow-stem auger at least two inches larger than the casing outside diameter (O.D.).

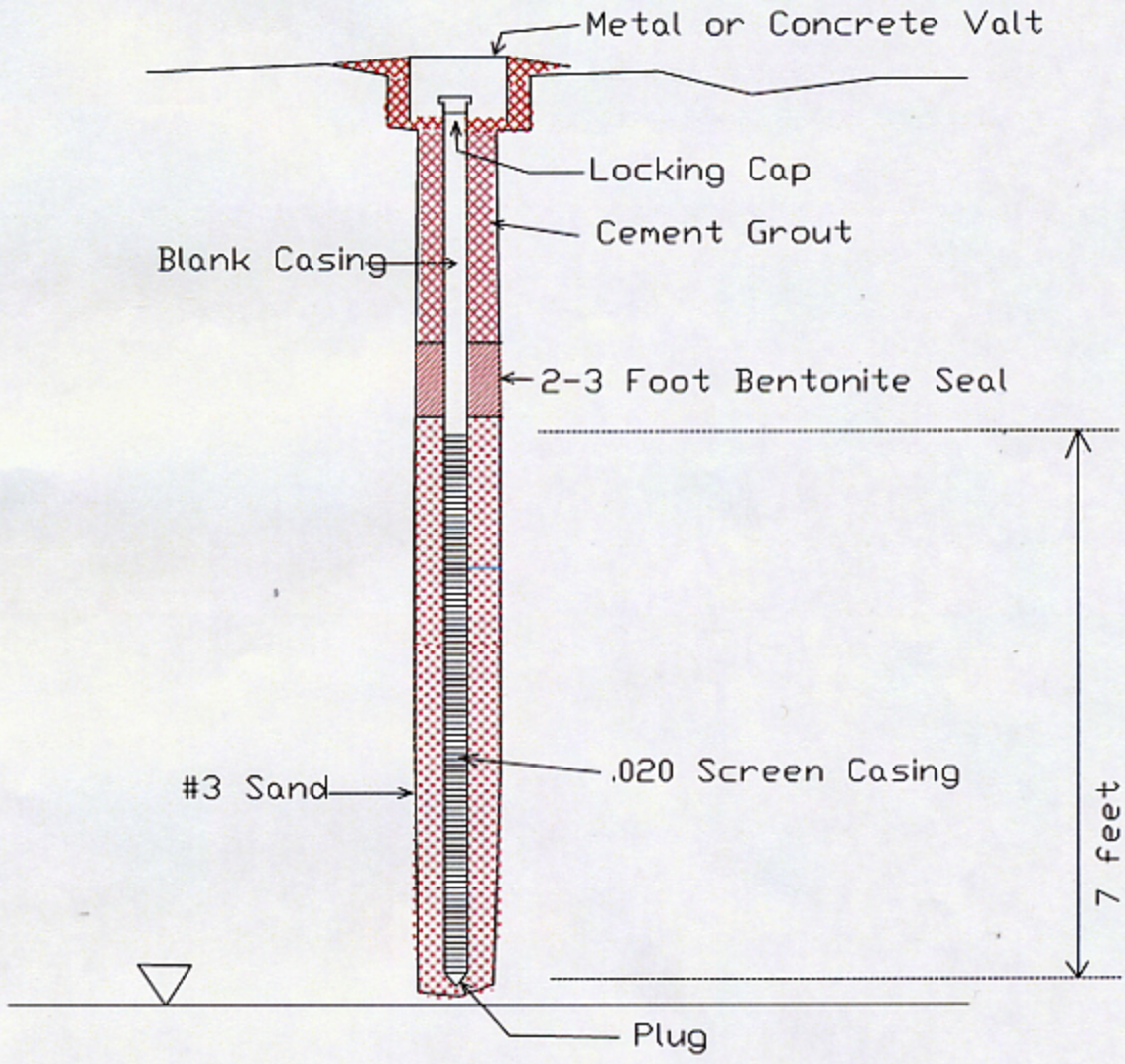
The monitoring wells will be cased with threaded, factory-perforated and blank, schedule 40 PVC. The perforated interval consisted of slotted casing, generally 0.010 to 0.040 inch wide by 1.5-inch long slot size, with 42 slots per foot (slots which match formation grain size as determined by field grain-size distribution analysis). A PVC cap will be fastened to the bottom of the casing (no solvents, adhesive, or cements were used), the well casing will be thoroughly washed and steam-cleaned.

After setting the casing inside the borehole, kiln-dried sand or gravel-filter material will be poured into the annular space to fill from the bottom of the boring to two feet above the perforated interval. A one to two feet thick bentonite plug will be placed above this filter material to prevent grout from infiltrating down into the filter material. Approximately one to two gallons of distilled water will be added to hydrate the bentonite pellets. Then the well will be sealed from the top of the bentonite seal to the surface with concrete or neat cement containing about 5% bentonite (see Well Construction Detail).

To protect the well from vandalism and surface water contamination, Christy box with a special type of Allen screw will be installed around the wellhead, (for wells in parking lots, driveways and building areas). Steel stove pipes with padlocks will be usually set over wellheads in landscaped areas.

In general, groundwater monitoring wells extend to the base of the upper aquifer, as defined by the consistent (less than 5 feet thick) clay layer below the upper aquifer, or at least 10 to 15 feet below the top of the upper aquifer, whichever is shallower. The wells do not extend through the laterally extensive clay layer below the upper aquifer. The wells are terminated one to two feet into such a clay layer.

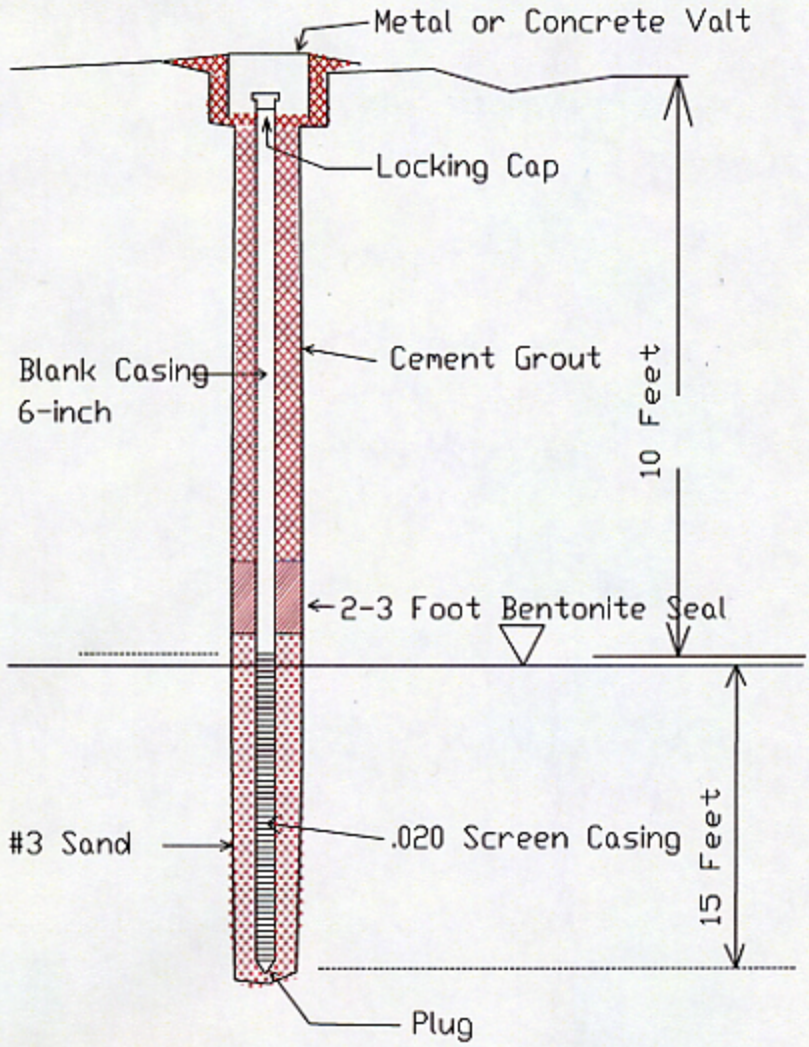
Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/4/2007	Figure 4 **Vapor Test Well Construction Details**



Generalized Vapor Well Construction Detail

Not to Scale

Enviro Soil Tech Consultants 131 Tully Road San Jose, CA 95112	PROJECT 909 Bluebell Drive Livermore, California PROJECT # 10-93-567-ST DATE: 12/4/2007	Figure 5 **Groundwater Test Well Construction Details**



Generalized Extraction Well Construction Detail

Not to Scale

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December 17, 2007

WELL DEVELOPMENT

For all newly installed groundwater monitoring wells, the well casing, filter pack and adjacent formations were cleared of disturbed sediment and water.

Well development techniques including pumping, bailing, surging, swabbing, jetting, flushing or air lifting by using a stainless steel or Teflon bailer, a submersible stainless steel pump, or air lift pump. The well development will continued until the discharged water appeared to be relatively free of all turbidity.

All water and sediment generated by well development will be collected in 55-gallon steel drums (Department of Transportation approved), closed head (17-H) for temporarily storage, and then will be disposed of properly, depending on analytical results.

to assure that cross-contamination did not occur between wells, all well development tools will be steam-cleaned or thoroughly washed in a Trisodium Phosphate (TSP) solution followed by a rinse in distilled water before each well development.

ENVIRO SOIL TECH CONSULTANTS

Environmental & Geotechnical Consultants

131 TULLY ROAD, SAN JOSE, CALIFORNIA 95111

Tel: (408) 297-1500 Fax: (408) 292-2116

MONITORING WELL SURVEY SHEET

NAME: _____ DATE: _____

FACILITY NAME AND ADDRESS: _____

_____

PROJECT NO.: _____

FIELD ACTIVITIES

WELL NUMBER	ROD READING	RIM ELEVATION	WATER ELEVATION

WARNING: HAVE YOU SURVEYED ALL WELLS? LOCATED ALL WELLS?

HAVE YOU CHECKED FOR & SURVEYED EXISTING MONITORING WELLS ON ADJACENT PROPERTIES OR PROPERTIES ACROSS THE STREET?

DO WE HAVE ACCURATE SKETCHES AT 1"=30' (AND 1"=100' IF NECESSARY)? IF NOT, MAKE THEM.

File No. 10-93-567-ST
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GROUNDWATER SAMPLING

Prior to collection of groundwater samples, all of the sampling equipment (i.e. bailer, cables, bladder pump, discharge lines and etc...) will be cleaned by pumping TSP water solution followed by distilled water.

Prior to purging, the well "Water Sampling Field Survey Forms" will be filled out (depth to water and total depth of water column will be measured and recorded). The well then will be bailed or pumped to remove four to ten well volumes or until the discharged water temperature, conductivity and pH stabilized. "Stabilized" is defined as three consecutive readings within 15% of one another.

The groundwater sample will be 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 will be used as sample containers. The groundwater sample will be decanted into each VOA vial in such a manner that there will be a meniscus at the top. The cap quickly will be placed over the top of the vial and securely tightened. The VOA vial will then be inverted and tapped to see if air bubbles are present. If none is present, then the sample will be labeled and refrigerated for delivery under chain-of-custody to the laboratory. The label information should include a sample identification number, job identification number, date, time, type of analysis requested and the sampler's name.

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Tel: (408) 297-1500 **Fax: (408) 292-2116**

FILE NO.:_____ **WELL NO.:**_____

DATE:_____ **SAMPLER:**_____

DEPTH TO WELL:_____ **1 WELL VOLUME:**_____

DEPTH TO WATER:_____ **5 WELL VOLUME:**_____

HEIGHT OF WATER COLUMN:_____ **ACTUAL PURGED VOLUME:**_____

CASING DIAMETER: _____**2"** _____**4"**

CALCULATIONS:

2" x 0.1632_____

4" x 0.653_____

PURGE METHOD:_____**BAILER** _____**DISPLACEMENT PUMP** _____**OTHER**

SAMPLE METHOD:_____**BAILER** _____**OTHER**

SHEEN:_____**NO** _____**YES, DESCRIBE:**_____

ODOR:_____**NO** _____**YES, DESCRIBE:**_____

FIELD MEASUREMENTS

TIME	VOLUME	Ph	TEMP.	E.C.

VOLUME OF WATER IN CASING OR HOLE

Diameter of Casing or Hole (inch)	Gallon per Foot of Depth	Cubic Feet per Foot of Depth	Liter per Meter of Depth	Cubic Meter per Meter of Depth
1	0.041	0.0055	0.509	0.509×10^{-3}
1½	0.092	0.0123	1.142	1.142×10^{-3}
2	0.163	0.0218	2.024	2.024×10^{-3}
2½	0.255	0.0341	3.167	3.167×10^{-3}
3	0.367	0.0491	4.558	4.558×10^{-3}
3½	0.500	0.0668	6.209	6.209×10^{-3}
4	0.653	0.0873	8.110	8.113×10^{-3}
4½	0.826	0.1104	10.26	10.26×10^{-3}
5	1.020	0.1364	12.67	12.67×10^{-3}
5½	1.234	0.1650	15.33	15.33×10^{-3}
6	1.469	0.1963	18.24	18.24×10^{-3}
7	2.000	0.2673	24.84	24.84×10^{-3}
8	2.611	0.3491	32.43	32.43×10^{-3}
9	3.305	0.4418	41.04	41.04×10^{-3}
10	4.080	0.5454	50.67	50.67×10^{-3}
11	4.937	0.6600	61.31	61.31×10^{-3}
12	5.875	0.7854	72.96	72.96×10^{-3}
14	8.000	1.069	99.35	99.35×10^{-3}
16	10.44	1.396	129.65	129.65×10^{-3}
18	13.22	1.767	164.18	164.18×10^{-3}
20	16.32	2.182	202.68	202.68×10^{-3}
22	19.75	2.640	245.28	245.28×10^{-3}
24	23.50	3.142	291.85	291.85×10^{-3}
26	27.58	3.687	342.52	342.52×10^{-3}
28	32.00	4.276	397.41	397.41×10^{-3}
30	36.72	4.909	456.02	456.02×10^{-3}
32	41.78	5.585	518.87	518.87×10^{-3}
34	47.16	6.305	585.68	585.68×10^{-3}
36	52.88	7.069	656.72	656.72×10^{-3}

CHAIN OF CUSTODY RECORD

PROJ. NO.	NAME
SAMPLERS: *(Signature)*	

NO.	DATE	TIME	SOIL	WATER	LOCATION	CONTAINER	ANALYSES REQUESTED (2)	REMARKS

Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*	Relinquished by: *(Signature)*	Date / Time	Receive 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	

SOP12

ENVIRO SOIL TECH CONSULTANTS

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131 TULLY ROAD, SAN JOSE, CALIFORNIA 95111

Tel: (408) 297-1500 Fax: (408) 292-2116

SAMPLE MANAGEMENT

Sample Type: Soil, Oil Solvents, Solids, Highly Contaminated Liquid (c)

General Composition	*Sample Volume*	*Sample Container*	*Preservative*	*Holding Time* (recommended/regulatory)
Weak Acids and Bases		plastic or glass		
Photosensitive materials		amber glass		
Volatile Organic		40 ml glass vial with TFE lined septum		
Non-Volatile Organic		glass with TFE lined cap		
Measurement – General Chemical Categories, Inorganic				
Inorganic, general		plastic or glass		
Metals, total		plastic or glass		
Measurement – General Chemical Categories, Organic				
Acid extractables		glass with TFE lined cap		
Base/neutral extractables		glass with TEF lined cap		
Measurement Specified Chemicals – Inorganic				
Hydrofluoric Acid		plastic		
Phosphoric Acid		plastic		

SAMPLE MANAGEMENT

Sample Type: Waste

General Composition	*Sample Volume*	*Sample Container*	*Preservative*	*Holding Time* (recommended/regulatory)
Measurement – General Chemical Categories, Inorganic				
Ammonia			add 1 ml conc H_3PO_4	24 hours
Arsenic			add 6 ml conc HNO_3/L	6 months
Chlorine			cool 4°C	24 hours
Chromium VI			add 6 ml conc H_2SO_4/L	24 hours
Cyanide, total			add 2.5 ml of 50% NaOH/L, cool 4°C	24 hours
Fluoride			cool 4°C	7 days
Mercury, total			add 5 ml conc HNO_3L	28 days
Mercury, dissolved			filter, add 5 ml conc HNO_3/L	38 days
Selenius			add 5 ml conc HNO_3/L	
Sulfide			add 2 ml conc HCl/l	
Zinc			add 2 ml conc HC1/1	

Sample Type: Soil, Oil, Solvents, Solids, Highly Contaminated Liquids (c)

Strong acids, pH<2	glass
Strong bases, pH>12.5	plastic

SAMPLE MANAGEMENT

Sample Type: Water and Wastewater

General Composition	***Sample Volume***	***Sample Container***	***Preservative***	***Holding Time*** **(recommended/regulatory)**
Sulfate	50 ml	plastic or glass	cool 4°C	7 days/28 days
Sulfide	500 ml	plastic or glass	cool 4°C, add 4 drops 2N Zn acetate/100 ml	24 hours/28 days
Sulfite	50 ml	plastic or glass lined septum	determine on site	No Holding
Measurement – Specific Chemicals Organic				
NTA	50 ml	plastic or glass waterline & center	cool 4°C	24 hours
Measurement – Physical Properties				
Acidity			cool 4°C	24 hours
Alkalinity			cool 4°C	24 hours
pH			determine on site cool 4°C	6 hours
Measurement – General Chemical Categories, Inorganic				
Metals, dissolved			filter on site, add 5 ml conc HNO_3/L	6 months
Metals, total			add 5 ml conc HNO_3/L	6 months
Measurement – General Chemical Categories, Organic				
Phenolics			add H_2PO_4 to pH 4 & 1 g $CuSO_4$/L, cool 4°C	24 hours

SAMPLE MANAGEMENT

Sample Type: Water and Wastewater

General Composition	***Sample Volume***	***Sample Container***	***Preservative***	***Holding Time*** **(recommended/regulatory)**
Measurement – Specific Chemicals, Inorganic				
Ammonium	50 ml	plastic or glass	cool 4°C, add H_2SO_4 To pH<2	24 hours/28 days
Boron	100 ml	plastic	None Required	28 days/28 days
Chlorine	200 ml	plastic or glass	determine on site	No Holding
Chromium VI	300 ml	plastic or glass rinse with 1:1 HNO_3	cool 4°C	24 hours/28 days
Cyanide, total	500 ml	plastic or glass add NaOH to pH>12	cool 4°C	24 hours/14 days
Cyanide, amenable to chlorination	50 ml	plastic or glass	add 100 mg NaS_2O_3	
Fluoride	300 ml	plastic	None Required	7 days/28 days
Iodide	100 ml	plastic or glass	cool 4°C	24 hours/-
Iodine	500 ml	plastic or glass	determine on site	½ hour/-
Mercury, total	500 ml	plastic or glass rinsed with 1:1 HNO_3	cool 4°C add HNO_3 to pH<2	28 days/28 days
Mercury, dissolved	100 ml	plastic or glass	filter on site add HNO_3 to pH<1	glass: 38 days hard plastic: 13 days
Nitrate	100 ml	plastic or glass	cool 4°C add H_2SO_4	24 hours/48 hours
Nitrate & nitrate	200 ml	plastic or glass	cool 4°C add H_2SO_4	24 hours//28 days
Nitrate	100	plastic or glass	cool 4°C or freeze	

SAMPLE MANAGEMENT

Sample Type: Water and Wastewater

General Composition	***Sample Volume***	***Sample Container***	***Preservative***	***Holding Time*** **(recommended/regulatory)**
Measurement – General Chemical, Organic				
Acid extractables		2 liter glass with TFE lined cap		
Base//neutral extractable		2 liter glass with TFE lined cap		
MBA's	250 ml	plastic or glass	cool 4°C	24 hours
Oil and Grease	1000 ml	glass, wide mouthed, calibrated	cool 4°C H_2SO_4 to pH<2	24 hours/28 days
Organic		glass rinsed with organic solvents, TFE cap		
Phenolics	500 ml	glass		24 hours/28 days
Purgeables by purge	50 ml	glass with TFE cap		

SAMPLE MANAGEMENT

Sample Type: Water and Wastewater (a, b, c)

General Composition	***Sample Volume***	***Sample Container***	***Preservative***	***Holding Time*** **(recommended/regulatory)**
Non-Volatile Organic		2 liter glass with TFE with lined cap		
Photosensitive materials		1 liter amber glass		
Volatile Organic		40 ml glass vial with TFE lined cap (collect in duplicate)		
Volatile	100 ml		cool 4°C	7 days
Measurement – Physical Properties				
Acidity	100 ml	plastic or borosilioate glass	cool 4°C	24 hours/14 days
Alkalinity	200 ml	plastic or glass	cool 4°C	24 hours/14 days
pH	25 ml	plastic or glass	determine on site	2 hours/2 hours
Temperature	1000 ml	plastic or glass	determine on site	No Holding
Measurement – General Chemical Categories, Inorganic				
Metals, dissolved	200 ml	plastic(g) or glass	filter on site (f)	6 months(e)
Metals, total	100 ml	plastic(g) or glass rinsed with 1:1 HNO_3	HNO_3 to pH<2 (g)	6 months/6 months (e)

File No. 10-93-567-ST
December 17, 2007

A P P E N D I X "D"

OUTLINE OF DRUM HANDLING PROCEDURES

ENVIRO SOIL TECH CONSULTANTS

File No. 10-93-567-ST
December 17, 2007

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
December 17, 2007

A P P E N D I X "E"

HEALTH AND SAFETY PLAN

ENVIRO SOIL TECH CONSULTANTS

File No. 10-93-567-ST
December 17, 2007

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 limits (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. ESTC 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

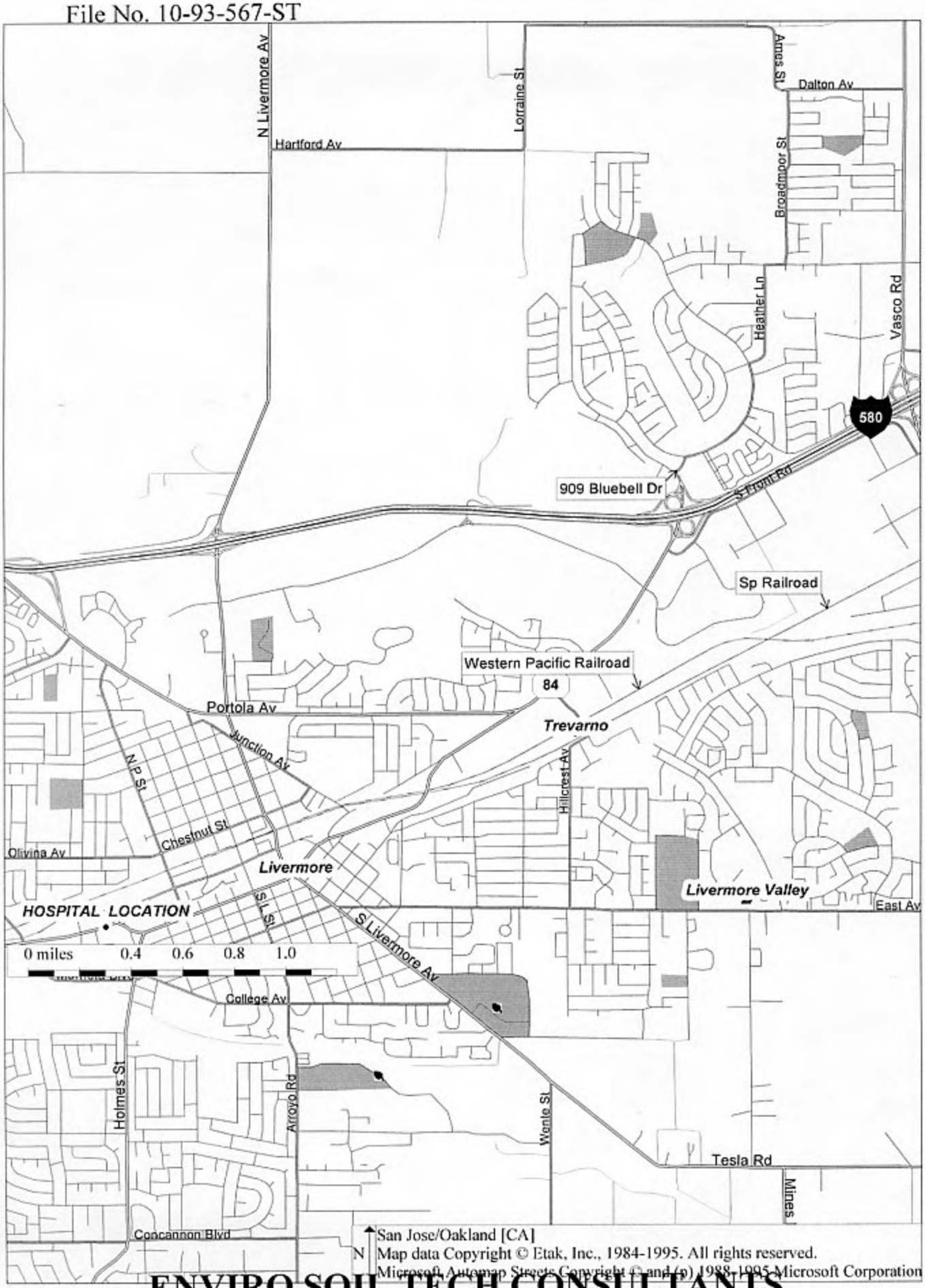
CHEMTREC. . . . . .(800) 424-9300

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, ESTC'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.

File No. 10-93-567-ST



ENVIRO SOIL TECH CONSULTANTS

HSP9

File No. 10-93-567-ST
December 17, 2007

A P P E N D I X "F"

TYPES OF PROTECTIVE CLOTHING AND RESPIRATION SHOULD BE USED

ENVIRO SOIL TECH CONSULTANTS

File No. 10-93-567-ST
December 17, 2007

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

disposal 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.