4115 Blackhawk Plaza Circle, Suite 100, Danville, CA 94506 (925) 648-2008 Fax (925) 648-2797

Compliance & Closure, Inc.

September 18, 2005

Alameda County
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Attention: Ms. Susan Hugo

RE: Limited Closure Plan Report
Aqua Chlor
15885 Altamont Pass Road, Tracy, California
(CCI Project No. 12176-1)

Dear Ms. Hugo:

On behalf of Aqua Chlor, Compliance & Closure, Inc. (CCI) has prepared this Limited Closure Plan report to document activities related to discontinue the use of chorine at the Aqua Chlor facility, located at 15885 Altamont Pass Road, Tracy, Alameda County, California (Figure 1).

Background

Since 1985, Aqua Chlor has occupied a10-acre site located at 15885 Altamont Pass Road in Tracy, Alameda County, California. Aqua Chlor, which employs approximately 20 people at its Altamont facility, is a residential swimming pool service company and services approximately 2300 swimming pools from their Altamont Pass facility.

A majority of the 10-acre site is vacant land. The area occupied by Aqua Chlor consists of two, single-story, metal warehouses, surrounded by a large gravel and dirt parking area. One of the metal structures is used as a warehouse and the other is a combination of an office, a small warehouse used to store pool chemicals, and an auto shop (Figure 2). In addition, there is an area that was previously used to fill 20-pound field service cylinders with chlorine for use in Aqua Chlor's business. Several yards south of the structures is a truck trailer, which is used for additional storage. Adjacent to the trailer are approximately 6 to 12 pallets of prepackaged pool chemicals.

Until March, 2005, the company used chlorine to disinfect and maintain swimming pools. Aqua Chlor now uses sodium hypochlorite to perform those functions.

Prior to 2005, bulk chlorine was brought to the site in one-ton gas cylinders provided by Pioneer Chemical of Tracy, California. A total of 7 to 8 such cylinders were stored at the subject site at any given time. The chlorine gas was then transferred to 20-pound cylinders for use in the company's customer service vehicles. The bulk chlorine was stored on the south side of the office warehouse building (Figure 3).

In the 1990s, Aqua Chlor used two small freezers filled with 85 gallons of an antifreeze solution (3 parts water to one part antifreeze) to chill the small cylinders prior to filling them with chlorine. The use of antifreeze to cool the small cylinders was terminated in late 2000 because antifreeze was dripping on the ground in front of the filling station. At the request of Alameda County, Aqua Chlor placed adsorbent mats under the two freezers as secondary containment and, additionally, discontinued the use of the water/antifreeze solution. Aqua Chlor has reported that the two freezers were later appropriately disposed. Since the cylinders had to be chilled by some method prior to filling them with chlorine gas, Aqua Chlor began placing the 20-pound cylinders in ordinary freezers.

The chlorine gas was transferred from the one ton cylinders to the small, chilled cylinders by copper tubing in a closed system. The amount of gas transferred was measured by a platform scale. The small cylinders were considered full when each weighed 16 pounds. Any chlorine gas trapped between the fill valve and filling tube was returned to a 2,000-gallon sodium hydroxide tank via PVC piping and a viton recovery tube. The fill system was completely closed and no chlorine gas reportedly escaped during the filling operation.

On or about October 13, 2000, a broken pipe related to the 2,000-gallon holding tank caused fourteen hundred gallons of a 7% sodium hydroxide solution (caustic soda) to spill onto the gravel and dirt parking lot in front of the existing warehouse. According to Aqua Chlor, approximately 95 tons of soil was removed from the site. The soil was excavated to approximately 2 feet below the ground surface (bgs). Prior to excavating, two soil samples were collected, one from the surface and one from 6-inches below the surface. The laboratory reported the surface sample to contain 11,000 ppm sodium, with a pH of 11+, and the 6-inch sample was reported to contain 2,000 ppm sodium with a pH of 8+.

As previously stated, in early 2005, Aqua Chlor discontinued the use of chlorine and began using sodium hypochlorite. In February, 2005, all the chlorine gas in the one ton cylinders was transferred to the 20-pound service cylinders, and on February 14, 2005, all the one-ton cylinders were returned to Pioneer Chemical in Tracy, California. All the

chlorine gas in the 20-pound cylinders was expended by the end of March 2005.

On May 23, 2005, CCI prepared a limited closure plan to discontinue the use of chlorine and sodium hydroxide at the Aqua Chlor site. In response to questions from Alameda County Health Care Services, CCI submitted additional information to the County on June 16, 2005. The County approved the work plan on July 19, 2005, conditioned upon certain clarifications, which CCI submitted to the County on August 4, 2005.

Closure Activities

The following items were addressed during the closure activities at the Aqua Chlor site. The equipment used to transfer chlorine from the bulk storage cylinders to the 20-pound field service cylinders included two freezers, a 6 foot piece of ¼-inch diameter copper fill tubing for the chlorine gas transfer, approximately 85 to 100 field service cylinders, approximately 30 feet of 2-inch diameter PVC piping with plastic control valves, and the 2,000-gallon sodium hydroxide storage tank. These items were addressed in the following manner:

1. Aqua Chlor ceased using the antifreeze in the freezers. The two freezers were emptied and rinsed in January 2001. American Valley Waste Oil, Inc. removed 90 gallons of antifreeze on January 8, 2001. Aqua Chlor gave the empty freezers to a scrap metal dealer and the contaminated soil was removed by the property owner (or someone working on behalf of the property owner);

2. There were approximately 85 to 100 20-pound service cylinders stored at the site. These service cylinders did not contain any chorine gas and were under a negative pressure. The company transferred these cylinders to its Sacramento facility;

3. Approximately 30 feet of 2" PVC piping was used in the chlorine gas recovery system. Due to the small quantity, CCI proposed that the PVC piping be cut into approximately 3-foot sections and placed in a 55-gallon drum. In addition, a 6-foot piece of copper tubing used to transfer the chlorine gas to the 20-pound cylinders was also placed into the drum for disposal. The drum was then taken by Environix to Superlink, Inc., located in Oakland, California for recycling. A copy of the uniform bill of lading is attached;

4. On September 15, 2005 the 2,000-gallon sodium hydroxide tank was pumped out and pressure washed by Onyx Environmental Services (Onyx). Onyx performed the tank cleaning in level C protection (Tyvek suite, gloves and full face respirator). Approximately 1,004 gallons of 10% (or less) sodium hydroxide

solution and rinse water were vacuumed out of the tank and placed into a truck for transport and disposal at US Filter located in Southern California. After the tank was vacuumed and pressure washed, the tank was inspected and found to be clean. The pH of the tank rinse water was measured at 9. A copy of the manifest is attached in Appendix B. The 2,000-gallon tank will remain on site and Aqua Chlor intends to use the tank as a rinse water holding tank in its future operations. Ms. Sukla De, representing the Alameda county Health Services Agency observed the tank cleaning activities.

Collection of soil samples

On August 12, 2005, CCI collected a total of 6 soil samples (S-1, S-1A, S-2, S-3, S-4 and S-5) from the area where the small services cylinders were filled (Figure 3), at the former location of the circulation pump and at the base of the sodium hydroxide tank. A background soil sample (S-6) was collected several yards south of investigated area.

In general, soil samples were collected from depths of approximately 15 to 22 inches at the various locations by digging a hole with a shovel and posthole digger, and collecting samples using a slide hammer fitted with 2 x 6 inch diameter brass liner. All six soil samples were collected in very dark gray (2.5Y, 3/1) clay, which was found to be very stiff, moist, with medium plasticity. Upon retrieval, the sampler was disassembled into its component parts. The brass liner was removed, then sealed with Teflon sheets, capped with plastic caps, labeled, logged on a chain-of-custody form and stored in a chilled chest containing ice for preservation in the field and during transport to the analytical laboratory. The samples were transported to Severn Trent Laboratories, Inc. (STL), located in Pleasanton, California. All soil samples were analyzed for chloride using EPA Test Method 9056 by Ion Chromatograph and pH using EPA Test Method 9040B. Selected soil samples from the fill station area were also analyzed for antifreeze (ethylene glycol) using EPA Test Method 8015B.

Soil Sample Results

The laboratory reported the pH values for the six samples ranged from a low of 8.1 in sample S-3 to a high of 9.7 in sample S-1. The background sample (S-6) was reported to have a pH of 9.0. The chloride concentrations were reported to range from 1100 milligrams per kilogram (mg/kg) at sample locations S-1 and S-5 to 1800 mg/kg at sample location S-1A. The background sample (S-6) was reported to contain chloride at 920 mg/kg. The laboratory reported one of four samples tested positive for ethylene glycol. Sample S-2 was reported to contain 1700 mg/kg ethylene glycol. Samples S-1 and S-1A, as well as background sample S-6, were reported to be free of detectable

ethylene glycol. The laboratory data is summarized in Table 1. A copy of the laboratory report is attached in Appendix A.

Conclusion

The subject site is relatively flat, is 10 acres in size, and is surrounded by sharply rising hills to the south, west and north. In conversations with Aqua Chlor personnel, rain water ponds on the surface over a large portion of the site during the rainy season. The ponding of the water is due to the dense and very stiff underling clay. After the water evaporates, a white precipitate is left behind. This material is most likely calcium or sodium chloride. The surrounding hills are the source for the background chloride concentrations at the site. Based on this information, the pH values and chloride concentrations reported for the samples collected appear to be within background values for the site. While the chloride concentrations in the soil samples are slightly higher than the background sample, the samples are within an order of magnitude and are not significantly higher than background levels.

As previously stated, soil sample S-2 was reported to contain 1700 mg/kg ethylene glycol. The other two samples collected in front of the former freezer location were reported to be "non-detect". The concentration of ethylene glycol at sample location S-2 appears to be localized. The sample was also colleted within very dense clay, which is prevalent throughout the site, and therefore, should contain any migration. Based upon these factors, it is CCI's opinion the ethylene glycol at the site does not pose a threat to the environment; therefore, no further remediation activities are warranted.

If you have any questions or require additional information, please call our office at (925) 648-2008.

Sincerely,
Compliance & Closure, Inc.

Gary R. Mulkey

REGISTERED GEOLOGIST
GARY R.
MULKEY
NO. 5842
STATE OF CALIFORNIA

Gary R. Mulkey, R.G. 5842

cc: Mr. John Wallace, Aqua Chlor

Aqua Chlor
CCI Project No. 12176-1

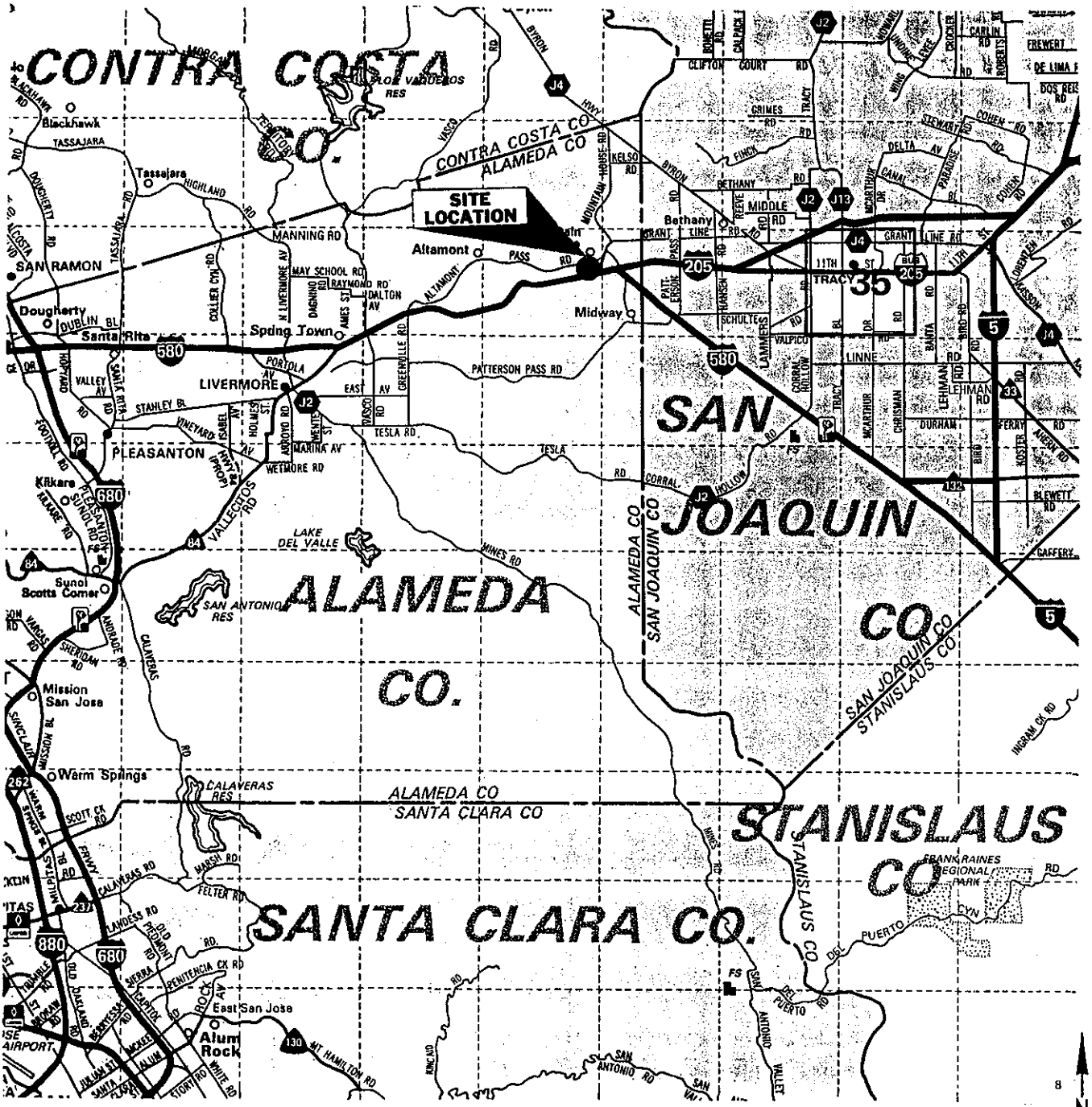
TABLE 1 **9/18/2005**

Summary of Soil Sample Data
Aqua Chlor - 15885 Altamont Pass Road, Tracy, CA

Sample Number	Date Sampled	Sample Depth (Inches)	pH (SU)	Chloride (mg/kg)	Ethlyene Glycol (mg/kg)
S-1	8/12/2005	15 to 22	9.7	1100	<25
S-1A	8/12/2005	22 to 28	8.8	1800	<25
S-2	8/12/2005	15 to 22	9.5	1200	**1700**
S-3	8/12/2005	15 to 22	8.1	1500	N/A
S-4	8/12/2005	15 to 22	8.7	1700	N/A
S-5	8/12/2005	15 to 22	8.9	1100	N/A
S-6	8/12/2005	15 to 22	9.0	920	<25

mg/kg	Milligrams per kilogram
N/A	Not Analyzed
<	Below laboratory detection limit

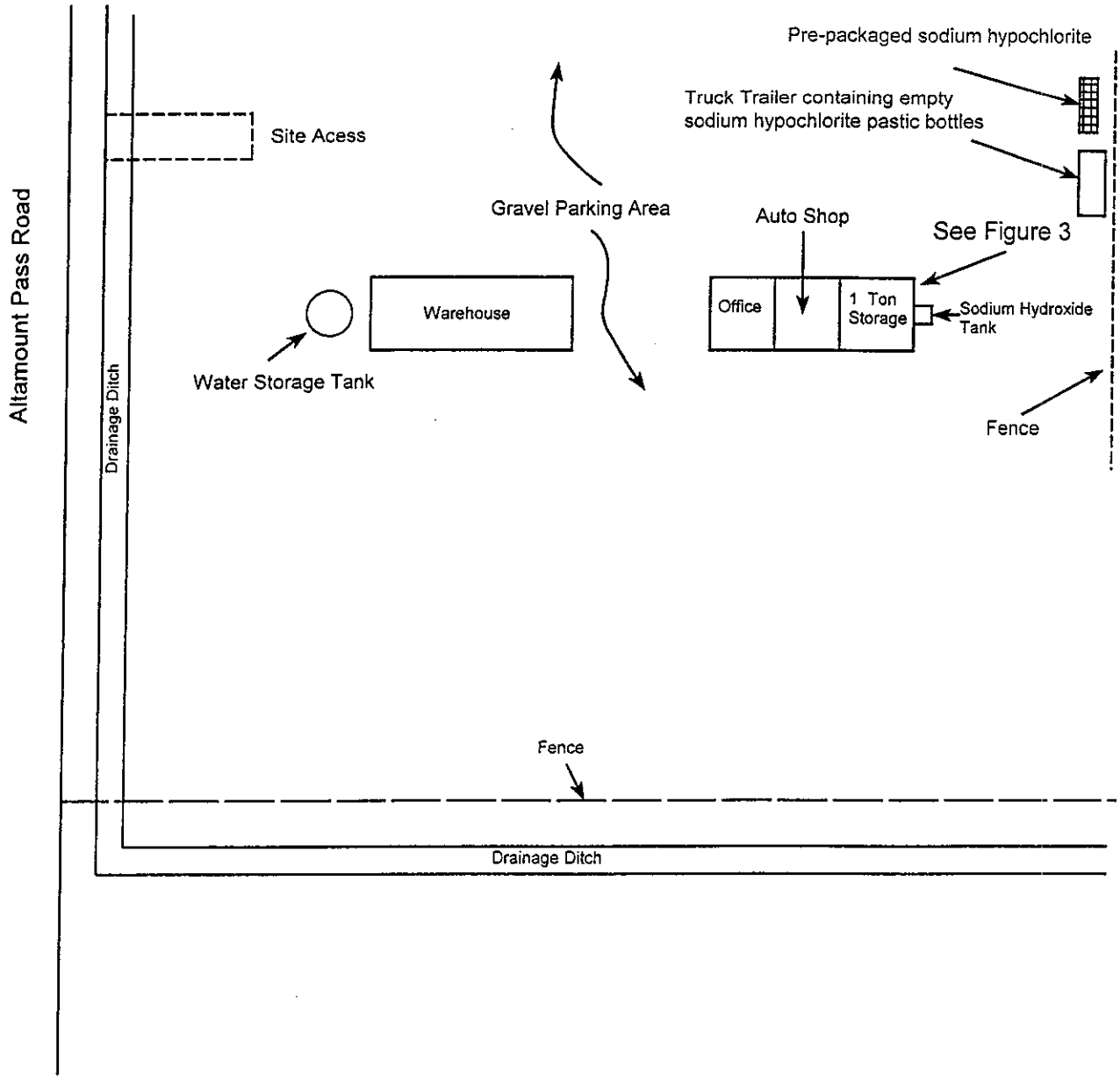
Compliance & Closure, Inc.



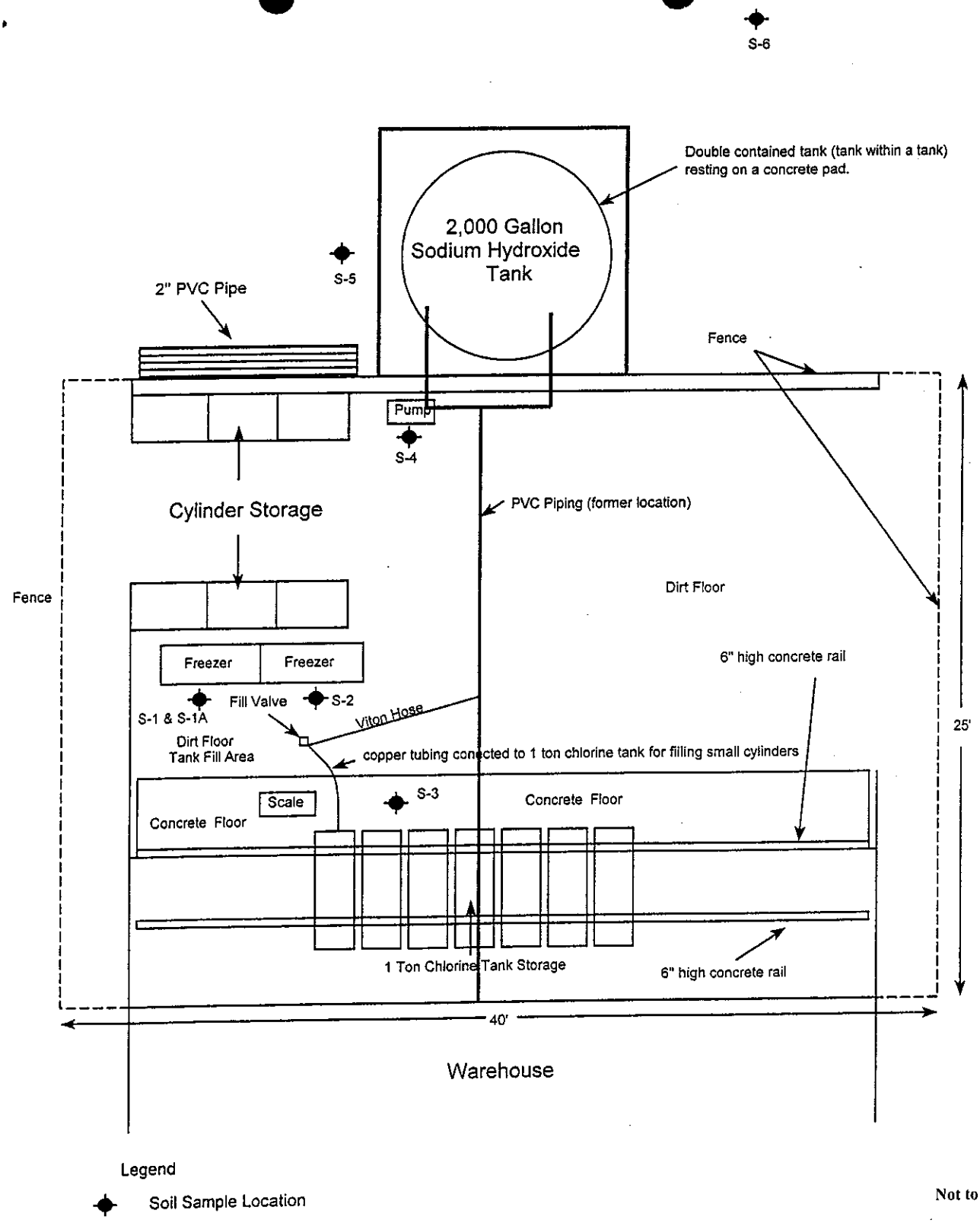
Scale 1" = 5 miles

Base: Thomas Guide, Central Valley Cities, 1998

Reviewed By:	**SITE LOCATION MAP**	Compliance & Closure, Inc.
Approved By:	**AQUA CHLOR** **15885 Altamont Pass Road** **Tracy, California**	Job No.: 12176-1 / Drawn By: GM Date: 5/23/2005 / Fig. No.: 1



Reviewed By:	**GENERAL SITE MAP**	Compliance & Closure, Inc.
Approved By:	**AQUA CHLOR** **15885 Altamont Pass Road** **Tracy, California**	Job No.: 12176-1 / Drawn By: GM Date: 6/8/2005 / Fig. No.: 2



Reviewed By:	**CYLINDER STORAGE/FILL LOACTION MAP**	Compliance & Closure, Inc.
Approved By:	**Aqua Chlor** **15885 Altamont Pass Road** **Tracy, California**	Job No.: 12176-1 / Drawn By: GM Date: 9/18/2005 / Fig. No.: 3

APPENDIX A

Laboratory Report and Chain of Custody Form

SEVERN TRENT STL

Submission#: 2005-08-0407

Compliance and Closure, Inc.

September 01, 2005

4115 Blackhawk Plaza Circle Suite 100
Danville, CA 94506

Attn.: Gary Mulkey

Project#: 12176-1
Project: Aqua Chlor
Site: Aqua Chlor, Tracy, CA

Dear Mr. Mulkey,

Attached is our report for your samples received on 08/12/2005 12:18
This report has been reviewed and approved for release. Reproduction of this report is permitted only in its entirety.

Please note that any unused portion of the samples will be discarded after 09/26/2005 unless you have requested otherwise.
We appreciate the opportunity to be of service to you. If you have any questions, please call me at (925) 484-1919.
You can also contact me via email. My email address is: ssidhu@stl-inc.com

Sincerely,

Surinder Sidhu

Surinder Sidhu
Project Manager

SEVERN TRENT STL

Submission: 2005-08-0407

pH

Compliance and Closure, Inc.
Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100
Danville, CA 94506
Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab #
S-1	08/12/2005 10:25	Soil	1
S-2	08/12/2005 10:30	Soil	2
S-1A	08/12/2005 10:35	Soil	3
S-3	08/12/2005 10:45	Soil	4
S-4	08/12/2005 10:55	Soil	5
S-5	08/12/2005 11:04	Soil	6
S-6	08/12/2005 11:11	Soil	7

pH

Compliance and Closure, Inc.
Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100
Danville, CA 94506
Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):	9045C	Test(s):	9045C
Sample ID:	**S-1**	Lab ID:	2005-08-0407 - 1
Sampled:	08/12/2005 10:25	Extracted:	8/16/2005 00:00
Matrix:	Soil	QC Batch#:	2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	9.7	0.1	SU	1.00	08/16/2005	

pH

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Attn.: Gary Mulkey

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Danville, CA 94506
Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):	9045C	Test(s):	9045C
Sample ID:	**S-2**	Lab ID:	2005-08-0407 - 2
Sampled:	08/12/2005 10:30	Extracted:	8/16/2005 00:00
Matrix:	Soil	QC Batch#:	2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	8.8	0.1	SU	1.00	08/16/2005	

pH

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Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9045C
Sample ID: **S-1A**
Sampled: 08/12/2005 10:35
Matrix: Soil

Test(s): 9045C
Lab ID: 2005-08-0407 - 3
Extracted: 8/16/2005 00:00
QC Batch#: 2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	9.5	0.1	SU	1.00	08/16/2005	

pH

Compliance and Closure, Inc.

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Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9045C
Sample ID: **S-3**
Sampled: 08/12/2005 10:45
Matrix: Soil

Test(s): 9045C
Lab ID: 2005-08-0407 - 4
Extracted: 8/16/2005 00:00
QC Batch#: 2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	8.1	0.1	SU	1.00	08/16/2005	

pH

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9045C
Sample ID: **S-4**
Sampled: 08/12/2005 10:55
Matrix: Soil

Test(s): 9045C
Lab ID: 2005-08-0407 - 5
Extracted: 8/16/2005 00:00
QC Batch#: 2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	8.7	0.1	SU	1.00	08/16/2005	

pH

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Attn.: Gary Mulkey

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):	9045C	Test(s):	9045C
Sample ID:	**S-5**	Lab ID:	2005-08-0407 - 6
Sampled:	08/12/2005 11:04	Extracted:	8/16/2005 00:00
Matrix:	Soil	QC Batch#:	2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	8.9	0.1	SU	1.00	08/16/2005	

pH

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):	9045C	Test(s):	9045C
Sample ID:	**S-6**	Lab ID:	2005-08-0407 - 7
Sampled:	08/12/2005 11:11	Extracted:	8/16/2005 00:00
Matrix:	Soil	QC Batch#:	2005/08/16-01.22

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	9.0	0.1	SU	1.00	08/16/2005	

pH

Compliance and Closure, Inc.
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Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Batch QC Report

Prep(s): 9040B/150.1
Method Blank
MB: 2005/08/16-01.22-001

Water

Test(s): 9040B/150.1
QC Batch # 2005/08/16-01.22
Date Extracted: 08/16/2005

Compound	Conc.	RL	Unit	Analyzed	Flag
pH	7.09	0.1	SU	08/16/2005	

SEVERN TRENT STL

Submission: 2005-08-0407

Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.
Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100
Danville, CA 94506
Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab #
S-1	08/12/2005 10:25	Soil	1
S-2	08/12/2005 10:30	Soil	2
S-1A	08/12/2005 10:35	Soil	3
S-3	08/12/2005 10:45	Soil	4
S-4	08/12/2005 10:55	Soil	5
S-5	08/12/2005 11:04	Soil	6
S-6	08/12/2005 11:11	Soil	7

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9056
Sample ID: **S-1**
Sampled: 08/12/2005 10:25
Matrix: Soil

Test(s): 9056
Lab ID: 2005-08-0407 - 1
Extracted: 8/19/2005 08:43
QC Batch#: 2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1100	500	mg/Kg	50.00	08/19/2005 08:43	

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9056
Sample ID: **S-2**
Sampled: 08/12/2005 10:30
Matrix: Soil

Test(s): 9056
Lab ID: 2005-08-0407 - 2
Extracted: 8/19/2005 08:58
QC Batch#: 2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1800	500	mg/Kg	50.00	08/19/2005 08:58	

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9056
Sample ID: **S-1A**
Sampled: 08/12/2005 10:35
Matrix: Soil

Test(s): 9056
Lab ID: 2005-08-0407 - 3
Extracted: 8/19/2005 09:14
QC Batch#: 2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1200	500	mg/Kg	50.00	08/19/2005 09:14	

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9056
Sample ID: **S-3**
Sampled: 08/12/2005 10:45
Matrix: Soil

Test(s): 9056
Lab ID: 2005-08-0407 - 4
Extracted: 8/19/2005 09:29
QC Batch#: 2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1500	500	mg/Kg	50.00	08/19/2005 09:29	

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):	9056	Test(s):	9056
Sample ID:	**S-4**	Lab ID:	2005-08-0407 - 5
Sampled:	08/12/2005 10:55	Extracted:	8/19/2005 09:45
Matrix:	Soil	QC Batch#:	2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1700	500	mg/Kg	50.00	08/19/2005 09:45	

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9056
Sample ID: **S-5**
Sampled: 08/12/2005 11:04
Matrix: Soil

Test(s): 9056
Lab ID: 2005-08-0407 - 6
Extracted: 8/19/2005 10:00
QC Batch#: 2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1100	500	mg/Kg	50.00	08/19/2005 10:00	

Misc Anions by Ion Chromatograph

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Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s): 9056
Sample ID: **S-6**
Sampled: 08/12/2005 11:11
Matrix: Soil

Test(s): 9056
Lab ID: 2005-08-0407 - 7
Extracted: 8/19/2005 10:16
QC Batch#: 2005/08/19-01.41

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	920	500	mg/Kg	50.00	08/19/2005 10:16	

Misc Anions by Ion Chromatograph

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Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Batch QC Report

Prep(s): 9056
Method Blank
MB: 2005/08/19-01.41-001

Soil

Test(s): 9056
QC Batch # 2005/08/19-01.41
Date Extracted: 08/19/2005 07:56

Compound	Conc.	RL	Unit	Analyzed	Flag
Chloride	ND	10	mg/Kg	08/19/2005 07:56	

Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.
Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100
Danville, CA 94506
Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1
Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Batch QC Report

Prep(s): 9056

Test(s): 9056

Laboratory Control Spike **Soil** **QC Batch # 2005/08/19-01.41**

LCS 2005/08/19-01.41-002 Extracted: 08/19/2005 Analyzed: 08/19/2005 08:12
LCSD 2005/08/19-01.41-003 Extracted: 08/19/2005 Analyzed: 08/19/2005 08:27

Compound	Conc. mg/Kg		Exp.Conc.	Recovery %		RPD	Ctrl.Limits %		Flags	
	LCS	LCSD		LCS	LCSD	%	Rec.	RPD	LCS	LCSD
Chloride	5.77	5.79	6	96.2	96.5	0.3	80-120	20		

SEVERN TRENT STL

Certificate of Analysis

STL Austin • 14046 Summit Drive, Austin, TX 78728 • Tel 512 244 0855 • Fax 512 244 0160 • www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. 2005-08-0407

2005-08-0407

Lot #: I5H160230

Surinder Sidhu

STL San Francisco
1220 Quarry Lane
Pleasanton, CA 94566

SEVERN TRENT LABORATORIES, INC.

Neal J. Salcher
Project Manager

August 29, 2005

American Council of Independent Laboratories
International Association of Environmental Testing Laboratories

Case Narrative

STL LOT NUMBER: I5H160230

This report contains the analytical results for the four samples received under chain of custody by Severn Trent Laboratories (STL) on August 16, 2005. These samples are associated with your 2005-08-0407 project.

All samples were received in good condition and within temperature requirements.

All applicable quality control procedures met method-specified acceptance criteria except where noted in the case narrative or flagged on the result pages.

If you have any questions, please feel free to call me at 512-244-0855.

EXECUTIVE SUMMARY - Detection Highlights

I5H160230

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
S-2 08/12/05 10:30 002				
Ethylene glycol	1700	500	mg/kg	SW846 8015B

ANALYTICAL METHODS SUMMARY

I5H160230

PARAMETER	ANALYTICAL METHOD
Nonhalogenated Organics Using GC/FID	SW846 8015B

References:

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

I5H160230

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
HHLCA	001	S-1	08/12/05	10:25
HHLCG	002	S-2	08/12/05	10:30
HHLCK	003	S-1A	08/12/05	10:35
HHLCT	004	S-6	08/12/05	11:11

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

QC DATA ASSOCIATION SUMMARY

I5H160230

Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH BATCH #	PREP BATCH #	MS RUN#
001	SOLID	SW846 8015B		5235217	5235129
002	SOLID	SW846 8015B		5235217	5235129
003	SOLID	SW846 8015B		5235217	5235129
004	SOLID	SW846 8015B		5235217	5235129

STL SAN FRANCISCO

Client Sample ID: S-1

GC Semivolatiles

Lot-Sample #...:	1SH160230-001	Work Order #...: HHLCA1AA	Matrix.....: SOLID
Date Sampled...:	08/12/05 10:25	Date Received..: 08/16/05	MS Run #.....: 5235129
Prep Date.....:	08/23/05	Analysis Date..: 08/26/05	
Prep Batch #...:	5235217	Analysis Time..: 14:54	
Dilution Factor:	1		
% Moisture.....:		Method.....: SW846 8015B	

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Ethylene glycol	ND	25	mg/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	76	(58 - 121)

STL SAN FRANCISCO

Client Sample ID: S-2

GC Semivolatiles

Lot-Sample #...:	I5H160230-002	Work Order #...:	HHLCG1AA	Matrix.....:	SOLID
Date Sampled...:	08/12/05 10:30	Date Received..:	08/16/05	MS Run #.....:	5235129
Prep Date.....:	08/23/05	Analysis Date..:	08/26/05		
Prep Batch #...:	5235217	Analysis Time..:	15:25		
Dilution Factor:	20				
% Moisture.....:		Method.....:	SW846 8015B		

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Ethylene glycol	1700	500	mg/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	87	(58 - 121)

STL SAN FRANCISCO

Client Sample ID: S-1A

GC Semivolatiles

Lot-Sample #...:	I5H160230-003	Work Order #...: HHLCK1AA	Matrix.....: SOLID
Date Sampled...:	08/12/05 10:35	Date Received..: 08/16/05	MS Run #.....: 5235129
Prep Date.....:	08/23/05	Analysis Date..: 08/26/05	
Prep Batch #...:	5235217	Analysis Time..: 15:55	
Dilution Factor:	1		
% Moisture.....:		Method.....: SW846 8015B	

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Ethylene glycol	ND	25	mg/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	81	(58 - 121)

STL SAN FRANCISCO

Client Sample ID: S-6

GC Semivolatiles

Lot-Sample #...: I5H160230-004 Work Order #...: HHLCT1AA Matrix.....: SOLID
Date Sampled...: 08/12/05 11:11 Date Received..: 08/16/05 MS Run #.....: 5235129
Prep Date.....: 08/23/05 Analysis Date..: 08/26/05
Prep Batch #...: 5235217 Analysis Time..: 16:25
Dilution Factor: 1
% Moisture.....: Method.....: SW846 8015B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Ethylene glycol	ND	25	mg/kg

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	77	(58 - 121)

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #...: I5H160230 Work Order #...: HH25P1AA Matrix.....: SOLID
MB Lot-Sample #: I5H230000-217

Prep Date.....: 08/23/05 Analysis Time..: 20:22
Analysis Date..: 08/23/05 Prep Batch #...: 5235217
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Ethylene glycol	ND	25	mg/kg	SW846 8015B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	93	(58 - 121)

NOTE(S):

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

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: I5H160230 Work Order #...: HH25P1AC Matrix.....: SOLID
LCS Lot-Sample#: I5H230000-217
Prep Date.....: 08/23/05 Analysis Date..: 08/23/05
Prep Batch #...: 5235217 Analysis Time..: 17:20
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD
Ethylene glycol	**112**	**(81 - 120)**	**SW846 8015B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	109	(75 - 126)

NOTE(S):

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

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE DATA REPORT

GC Semivolatiles

Client Lot #...: I5H160230 Work Order #...: HH25P1AC Matrix.....: SOLID
LCS Lot-Sample#: I5H230000-217
Prep Date.....: 08/23/05 Analysis Date..: 08/23/05
Prep Batch #...: 5235217 Analysis Time..: 17:20
Dilution Factor: 1

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	METHOD
Ethylene glycol	400	447	mg/kg	112	SW846 8015B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	109	(75 - 126)

NOTE(S):

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

Bold print denotes control parameters

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...:	I5H160230	Work Order #...:	HHLCA1AC-MS	Matrix.....:	SOLID
MS Lot-Sample #:	I5H160230-001		HHLCA1AD-MSD		
Date Sampled...:	08/12/05 10:25	Date Received..:	08/16/05	MS Run #.....:	5235129
Prep Date.....:	08/23/05	Analysis Date..:	08/23/05		
Prep Batch #...:	5235217	Analysis Time..:	17:50		
Dilution Factor:	1	% Moisture.....:			

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Ethylene glycol	113	(81 - 120)			SW846 8015B
	110	(81 - 120)	3.0	(0-30)	SW846 8015B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	116	(58 - 121)
	122 *	(58 - 121)

NOTE(S):

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

Bold print denotes control parameters

* Surrogate recovery is outside stated control limits

MATRIX SPIKE SAMPLE DATA REPORT

GC Semivolatiles

Client Lot #...:	I5H160230	Work Order #...:	HHLCA1AC-MS	Matrix.....:	SOLID
MS Lot-Sample #:	I5H160230-001		HHLCA1AD-MSD		
Date Sampled...:	08/12/05 10:25	Date Received..:	08/16/05	MS Run #.....:	5235129
Prep Date.....:	08/23/05	Analysis Date..:	08/23/05		
Prep Batch #...:	5235217	Analysis Time..:	17:50		
Dilution Factor:	1	% Moisture.....:			

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD
Ethylene glycol	ND	400	454	mg/kg	113		SW846 8015B
	ND	400	440	mg/kg	110	3.0	SW846 8015B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
n-Butanol	116	(58 - 121)
	122 *	(58 - 121)

NOTE(S):

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

Bold print denotes control parameters

* Surrogate recovery is outside stated control limits.

Report Attachment

The results included in this report have been reviewed for compliance with the laboratory QA/QC plan and meet all requirments of NELAC. All data have been found to be compliant with laboratory protocol except as otherwise noted.

Note that if this report contains tests performed for the following methods, the associated method deviations are applicable.

EPA 410.4, COD: Laboratory uses different analytical wavelength as specified by instrument manufacturer.
EPA 340.2, Fluoride: Preliminary Bellack distillation not performed.
EPA 624: The laboratory uses a different desorb time and purge volume than stated in the method.
EPA 8151A: Laboratory utilizes alternate extraction solvent.
Iowa OA1: Benzene, toluene, ethylbenzene and xylenes (BTEX) are not analyzed along with the Gasoline Range Organics if client does not require BTEX.
EPA TO-12: Samples not analyzed in duplicate.
EPA TO-14A and TO-15: Zero humidified nitrogen is used in place of air for method blanks.

TRRP Reporting Requirements

If this package contains reports requiring TRRP (Texas Risk Reduction Program) reporting criteria, the following information applies.

The REPORTING LIMIT is equivalent to the TRRP acronym MQL (method quantitation limit).
The MDL is equivalent to the TRRP acronym SQL (sample quantitation limit).

SEVERN TRENT **STL**

CHAIN-OF-CUSTODY ADDENDUM

Lot No: I5H160230

RECEIVED BY: BJ

COC NUMBER:

DATE/TIME RECEIVED: 2/16/05 0830

QUOTE/PROFILE: 60420

UNPACKED DATE/TIME: 2/16/05 0930

CLIENT/PROJECT: STL San Francisco

SAMPLES LOGGED IN: CC

LOG-IN REVIEWED: CT

Number of Shipping Containers Received with Chain of Custody: 1

VOC AIR / FILTER SAMPLES ☐ YES **SEE SECTIONS 1.0, 2.0, & 6.0**

1.0 CONTAINERS EXAMINED UPON RECEIPT: BJ

Container Sealed: ☑ YES ☐ NO

Custody Seal Signed/Dated: ☑ YES ☐ NO

Custody Seal Present: ☑ YES ☐ NO

Containers checked for radioactivity: ☐ YES ☐ NO ☑ N/A

If seal not intact or Geiger counter reading >0.5 mR/hr, list air bill number of that container(s):

2.0 VOC CANISTERS EXAMINED UPON RECEIPT:

Canister Valves Closed: ☐ YES ☐ NO

Canister Valves Capped: ☐ YES ☐ NO

Valve Cap Tightened Properly: ☐ YES ☐ NO

Packing Material Used: (circle)

None / Absorbent / Paper / Bubble Wrap

Samples Received Match Chain: ☐ YES ☐ NO

Other Equipment Received: ☐ YES ☐ NO

See Additional Comments (Section 5.0 and / or 7.0) ☐ YES ☐ NO

Chain-of-Custody form properly maintained: ☐ YES ☐ NO

Can Size: ☐ 6L ☐ 15L Other

3.0 SAMPLE TEMPERATURE UPON RECEIPT BY: BJ **IR THERMOMETER #:** 5

Temperature of the container(s):

Circle selection: TB = Temp. Blank and/or SC = Sample Container *[acceptable tolerance 4°C ± 2°; (NC, WI: 1-4.4°C)]*

TB (SC) 2.2°	TB SC	TB SC	TB SC	TB SC	TB SC	TB SC	TB SC	TB SC	TB SC

If temperature is outside acceptable tolerance, Project Manager was notified (____PM). Date: Time:

Samples received do not require cooling

OK to analyze samples: ☑ YES ☐ NO

PRESERVATION OF SAMPLES REQUIRED: ☑ NA ☐ YES **VERIFIED BY:** BJ

Base samples are>pH 12: ☐ YES ☐ NO

Acid preserved are<pH 2: ☐ YES ☐ NO

Cyanide samples checked for sulfides: ☐ YES

Sulfide samples appear to be preserved with zinc acetate: ☐ YES ☐ NO

Samples checked for chlorine per specification (N.C.) ☐ YES

Free chlorine present: ☐ YES ☐ NO

If sample preservation is outside acceptable tolerance, Project Manager was notified (____PM)

Date: Time: ☐ see pH adjustment form

VOLATILE SAMPLES FILLED COMPLETELY, IF NOT, LIST ID AND HEADSPACE OF VOA's CONTAINING BUBBLES EXCEEDING 6MM IN DIAMETER:

Sample ID	mm Headspace

Sample ID	mm Headspace

4.0 CONDITION OF BOTTLES/CONTAINERS VERIFIED BY: _____

Samples received match COC: ☑ YES ☐ NO Bottles received intact: ☑ YES ☐ NO
See additional discrepancies/comments section: ☐ YES ☑ NO Samples received from USDA restricted area: ☐ YES ☑ NO
Chain-of-Custody form properly maintained: ☑ YES ☐ NO VOA trip blanks included: ☐ YES ☐ NO ☑ N/A

5.0 ADDITIONAL DISCREPANCIES

Appears on COC		Appears on Label		
Sample ID	Date/Time	Sample ID	Date/Time	Comments

6.0 SHIPPING DOCUMENTATION:

Air/freight bill is available and attached to COC: ☑ YES ☐ NO Air bill #: _____
Hand-delivered Carrier: _____ Date: _____ Time: _____

7.0 OTHER COMMENTS:

Need 120ml for each DO

CORRECTIVE ACTION:

Client's Name: _____ Informed verbally on: _____ By: _____
Client's Name: _____ Informed verbally on: _____ By: _____
Sample(s) processed "as is" comments: _____

Samples(s) on hold until: _____ If released, notify: _____

REVIEW:
Project Management: Noel Belden Date: 8/30/05

SIGNED ORIGINAL MUST BE RETAINED IN THE PROJECT FILE

I5H160230

SEVERN TRENT **STL**

Chain of Custody

Date Shipped: 8/15/2005

2005-08-0407 - 1

From

STL San Francisco (CL)
1220 Quarry Lane
Pleasanton, CA 94566-4756

Project Manager: Surinder Sidhu
Phone: (925) 484-1919 Ext.
Fax: (925) 484-1096
Email: ssidhu@stl-inc.com

To:

STL Austin
14046 Summit Dr., Building B
Austin, TX 78728

Phone: (512) 244-0855 Ext.
Fax: (512) 224-0160
Contact: Sample Control
Phone: (512) 244-0855 Ext.

CL Submission #: 2005-08-0407
CL PO #:

Project #: 12176-1
Project Name: Aqua Chlor

Client Sample ID / Analysis	CL #	Sampled	Matrix / Method	TAT
S-1	1	8/12/2005 10:25:00AM	Soil	
Subcontract - Others /* ANTIFREEZE */ /*Ethylene Glycol ship 8/15 to STL-Austin 10 DAY TAT */				5 Day
S-2	2	8/12/2005 10:30:00AM	Soil	
Subcontract - Others /* ANTIFREEZE */ /*Ethylene Glycol ship 8/15 to STL-Austin 10 DAY TAT */				5 Day
S-1A	3	8/12/2005 10:35:00AM	Soil	
Subcontract - Others /* ANTIFREEZE */ /*Ethylene Glycol ship 8/15 to STL-Austin 10 DAY TAT */				5 Day
S-6	7	8/12/2005 11:11:00AM	Soil	
Subcontract - Others /* ANTIFREEZE */ /*Ethylene Glycol ship 8/15 to STL-Austin 10 DAY TAT */				5 Day

PLEASE INCLUDE QC WITH FAXED AND HARD-COPY RESULTS

RELINQUISHED BY: 1	RELINQUISHED BY: 2	RELINQUISHED BY: 3
Signature: [signature] Time: 1300	Signature Time	Signature Time
Printed Name Date: 8-15-05	Printed Name Date	Printed Name Date
Company: STL	Company	Company

RECEIVED BY: 1	RECEIVED BY: 2	RECEIVED BY: 3
Signature: [signature] Time: 0830	Signature Time	Signature Time
Printed Name: B. J. Jenkins Date: 8/16/05	Printed Name Date	Printed Name Date
Company: STL	Company	Company

STL San Francisco

Sample Receipt Checklist

Submission #:2005- 08-0407

Checklist completed by:	SA	DATE	8/12/05
Courier: ☐ STL SF	Courier ☐ Fedex UPS Other		Client ☐

	Log-In Details	Yes	No	Comments
1	Custody seals intact on shipping container/samples		✓	
2	Chain of custody present?	✓		
3	Chain of custody signed when relinquished and received?	✓		☐ Picked up at Secure Location ☐ Client signed-off at time prior to pick-up
4	All samples checked when COC relinquished		✓	
5	Chain of custody agrees with sample labels?	✓		
6	Samples in proper container/bottle?	✓		
7	Sample containers intact?	✓		
8	Sufficient sample volume for indicated test?	✓		
9	All samples received within holding time?	✓		

Cooler Temperature Compliance Check

Temperature Blank Reading	If no temp blank is submitted individual temperatures must be >0°C and not frozen →	Cooler Sample Temperatures #1	#2	#3	Average
		12	11	13	12°C

Reason for Elevated Temperature

☐ - Ice Melted | Insufficient ice

☐ Samp. in boxes | ✓ Sampled < 4hr | ☐ Ice not req.

Samples with Temp > 6°C - Comments

VOA Sample Inspection

	Sample #	Small	Med.	Large	Samples with broken, cracked or leaking containers
Are bubbles present in any of the VOA vials ?		0	0	0	
		☐	☐	☐	
		☐	☐	☐	
		☐	☐	☐	

Water - pH acceptable upon receipt?	Yes	No	Samples with Unacceptable pH
	☐	☐	

☐ pH adjusted - Preservative used ☐ HNO_3 ☐ HCl ☐ H_2SO_4 ☐ NaOH ☐ ZnOAc – Lot #(s) _____

Comments:

Project Management [Routing for instruction of indicated discrepancy(ies)]

Project Manager: (initials) _____ Date: ____/____/05 Client contacted: Yes☐ No☐

Summary of discussion:

Corrective Action (per PM/Client):

Compliance & Closure, Inc.

2005-08-0427

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

117552

PROJECT NO	PROJECT NAME/SITE	P.O. #
12176-1	Aqua Chlor Tracy, CA	

SAMPLERS (SIGN) Gary R. Mulkey (PRINT) Gary R. Mulkey

SAMPLE IDENTIFICATION	DATE	TIME	COMP	GRAB	PRES USED	ICED	NO. CONTAINERS	SAMPLE TYPE	BTEX (8021/8020)	TPHg (8015)	TPHd (8015)	TOG 418.1/5520	8010/8011	624/8240	625/8270	Chloride	pH	Auti Freeze	REMARKS
S-1	8/12/05	10:25		X	None	X	1	Soil								X	X	X	
S-2	8/12/05	10:30		X		X	1									X	X	X	
S-1A	8/12/05	10:35		X		X	1									X	X	X	
S-3	8/12/05	10:45		X		X	1									X	X		
S-4	8/12/05	10:55		X		X	1									X	X		
S-5	8/12/05	11:04		X		X	1									X	X		
S-6	8/12/05	11:11		X		X	1									X	X	X	

RELINQUISHED BY	DATE	TIME	RECEIVED BY
Gary R. Mulkey	8/12/05	12:18	
RELINQUISHED BY	DATE	TIME	RECEIVED BY
RELINQUISHED BY	DATE	TIME	RECEIVED BY
RELINQUISHED BY	DATE 8/12/05	TIME 12:18	RECEIVED BY LABORATORY

LABORATORY: STL Pleasanton, CA

REQUESTED TURNAROUND TIME: standard

RECEIPT CONDITION: Temp 12°c & Ice

PLEASE SEND RESULTS TO:

Compliance & Closure, Inc.
4115 Blackhawk Plaza Circl
Suite 100
Danville, CA 94506
(925) 648-2008
Fax (408) 226-9672
Gary@CCI-ENVR.com

PROJECT MANAGER: Attn: Mr. Gary Mulkey

APPENDIX B

Copies of Relevant Documents

adams 9013 (3-PART FORM)

982447/9013 REV 5/00

UNIFORM STRAIGHT BILL OF LADING Original—Not Negotiable—Domestic

Shipper's # 081005-12

Carrier: Environex Agent's No.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading,

at 15885 Altamont Pass Road Tracy CA from Aqua Chlor

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned and destined as shown below (which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees as carrier to the usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained, including the conditions on back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address of consignee—For purposes of notification only.)

Consigned to Superlink Inc 888 92nd Ave

Destination Oakland (Street / City) State of CA Zip Code 94603 County of

Routing Delivering Carrier Vehicle or Car Initial No.

Collect On Delivery

$ _____ and remit to: _____ Street _____ City _____ State

C. O. D. charge to be paid by { Shipper ☐ Consignee ☐

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statements:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor.)

If charges are to be prepaid, write or stamp here, "TO BE PREPAID."

Received $_____ to apply to prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
(the signature here acknowledges only the amount Prepaid.)

Charges Advanced:

$_____

No. Packages	Description of Articles, Special Marks, and Exceptions	*Weight (Sub. to Cor.)	Class or Rate	Check Column
2	PVC plastic piping (55 gal) (for recycling)			

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight." NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Received 7/1

Mary Lan for Aquachlor Shipper, Per _____ Agent, Per _____

Permanent post-office address of shipper.

(This Bill of Lading is to be signed by the shipper and agent of the carrier issuing same.)

1

Bill of Lading

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-00)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of [redacted] 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAC002568328 Manifest Document No. 05082
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
AQUA CHEM BY SWAN CHEM
15885 ALTAMONT PASS ROAD
TRACY, CA 95391

A. State Manifest Document Number 24399175

4. Generator's Phone (925) 449-7500

B. State Generator's ID

5. Transporter 1 Company Name
ONYX ENVIRONMENTAL SVCS LLC

6. US EPA ID Number NJD986357969

C. State Transporter's ID (Reserved.)

D. Transporter's Phone (973) 344-7111

7. Transporter 2 Company Name
STURGEON AND SON, INC.

8. US EPA ID Number CAD044776742

E. State Transporter's ID (Reserved.)

F. Transporter's Phone (661) 324-4400

9. Designated Facility Name and Site Address
ONYX ENVIRONMENTAL SVCS LLC
1125 HENSLEY STREET
RICHMOND, CA 94801

10. US EPA ID Number CAT080014979

G. State Facility's ID

H. Facility's Phone (510) 235-2802

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. NON-RCRA HAZARDOUS WASTE SOLID, N.O.S. (SOIL CONTAMINATED DIESEL), NONE, NA3077	001	DT	2020	P	State 151 EPA/Other NONE
b.					State EPA/Other
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
SOIL IN HYDRAULIC

K. Handling Codes for Wastes Listed Above
a. b.
c. d.

15. Special Handling Instructions and Additional Information
PRIORITY SHIPMENT - CLASSIFICATION - EMERGENCY NUMBER/INFOTRAC 1-800-535-5053

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JOHN WALLACE Signature: [signature] Month 09 Day 15 Year 05

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: CARLOS VERDUGO Signature: [signature] Month 09 Day 15 Year 05

18. Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name: Signature: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Signature: Month Day Year

GENERATOR — TRANSPORTER — FACILITY

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

ORIGINAL MAILED 9-16-05 [signature]

DO NOT WRITE BELOW THIS LINE.

Blue: GENERATOR SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
To: P.O. Box 400, Sacramento, CA 95812-0400

DISC 8022A (1/99)
EPA 8700—22

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-99)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
CAC002595206			

3. Generator's Name and Mailing Address
AQUA CHLORINE SWIM CHEM
15685 ALTAMONT PASS ROAD
TRACY, CA 95391

4. Generator's Phone (925) 449-7945

A. State Manifest Document Number: 24399174

B. State Generator's ID:

5. Transporter 1 Company Name: STURGEON AND SON, INC.

6. US EPA ID Number: CAD009718762

C. State Transporter's ID (Reserved):

D. Transporter's Phone: (661) 323-6400

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID (Reserved):

F. Transporter's Phone

9. Designated Facility Name and Site Address
C.S. FILTER RECOVERY SERVICES
5375 SOUTH BOYLE AVE.
VERNON, CA 90058

10. US EPA ID Number: CAD982393293

G. State Facility's ID

H. Facility's Phone: (323) 277-1500

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. ~~SODIUM HYDROXIDE SOLUTION~~ NON RCRA HAZARDOUS WASTE LIQUID (SODIUM HYDROXIDE SOLUTION) NOT REGULATED	001	T	01000	G	State 134 EPA/Other NONE
b.					State EPA/Other
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
ALL SODIUM HYDROXIDE SOLUTION

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
PACKING SLIPS ATTACHED FOR CLARIFICATION - EMERGENCY NUMBER-INFOTRAC 1-800-535-5053

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name	Signature	Month	Day	Year
JOHN WALLACE		09	15	05

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
JOE PAYNE		09	15	05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR — TRANSPORTER — FACILITY

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DO NOT WRITE BELOW THIS LINE.

ORIGINAL
MAILED
9-16-05

DTSC 8022A (1/99)
EPA 8700-22

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