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Alameda County Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

PERJURY STATEMENT

Name of Document or Report: Additional Site Characterization Work Plan

RO# 0002994

I declare, under penalty and perjury, that the information and/or recommendations

contained in the above stated document or report is true and correct to the best of my

knowledge. EAH INC. Bannett Signature

Alvin Bonnet

<u>Alvin Bonnett</u> Company Officer or Legal Representative Name

Senior Vice President Title 4/1/09



April 3, 2009

Ms. Lynn Berard EAH Housing Inc. 2169 East Francisco Boulevard, Suite B San Rafael, California 94901

RE: Fuel Leak Case No. RO0002994 and Geotracker Global ID T10000000818 Addition Site Characterization to Support Site Closure Work Plan 3761 Park Boulevard Way, Oakland, California ACC Project Number 6783-003.00

Dear Ms. Berard:

ACC Environmental Consultants, Inc., (ACC) has prepared the enclosed Work Plan for additional site characterization to support site closure at 3761 Park Boulevard Way, Oakland, California. This work will be scheduled immediately following Work Plan approval from the Alameda County Environmental Health (ACEH).

This Work Plan was designed to: 1) obtain potential contaminant volatilization to indoor air data at the site; 2) further delineate petroleum hydrocarbon impacts in soil and groundwater; and 3) obtain additional necessary data in order to evaluate the case for regulatory closure. The field portion of this scope of work is scheduled for April 14, 2009, pending approval of the work plan by Alameda County Environmental Health (ACEH).

On your behalf, ACC has forwarded an electronic copy of this Work Plan to Mr. Paresh C. Khatri and Ms. Donna Drogos at ACEH for review and approval. If you have any questions regarding this Work Plan, please call me at (510) 638-8400, extension 110 or email me at jsiudyla@accenv.com.

Sincerely,

Julia Siudyla Project Geologist

Enclosure



Additional Site Characterization Work Plan

3761 Park Boulevard Way Oakland, California

ACC Project Number 6783-003.00 Fuel Leak Case No. RO0002994 and Geotracker Global ID T10000000818

Prepared for:

Ms. Lynn Berard EAH Housing Inc. 2169 East Francisco Boulevard, Suite B San Rafael, California 94901

April 3, 2009

Julia Siudyla Project Geologist

(heide Reviewed by:

Misty C. Kaltreider, PG 7016, CEG 2466 Engineering Geologist



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Additional Site Characterization Work Plan 3761 Park Boulevard Way Oakland, California

1.0 INTRODUCTION

At the request of EAH Housing Inc., ACC Environmental Consultants, Inc. (ACC) has prepared this Work Plan to perform Additional Site Characterization to support site closure at 3761 Park Boulevard Way, Oakland, California (Site). Previous environmental investigations identified petroleum hydrocarbon-impacts in soil and groundwater at the Site. This proposed work specifically addresses potential contaminant volatilization to indoor air and additional delineation of soil and groundwater impact at the Site.

This investigation work plan is prepared for the express use of EAH, its agents and employees and shall not be relied upon by third party interests unless written authorization is provided by EAH and ACC. The information and or proposed scope of work included in this work plan may be required to be submitted and approved to regulatory agencies overseeing work. This work plan is not intended to be used as a specification to address items outside the scope of this document or to provide guidance for remedial activities unless otherwise stated.

1.1 Background

The Site is located at 3761 Park Boulevard Way in Oakland, California. The Site is comprised of an approximately 0.6-acre parcel located on the northeast side of Park Boulevard Way. The subject property is developed with a five story, u-shaped building comprising 70,000-square feet of multi-tenant (senior, low income housing) apartments. The building consists of 84 one-bedroom apartments, and several common areas and two passenger elevators. The building also has a ground level parking garage located below the southeastern portion of the building.

The subject property was identified as a part of the Phase I Environmental Site Assessment (ESA) (October 2008) to be a historical gas station. The historical resources utilized in the Phase I ESA (EDR City Directories and the historical Sanborn maps) indicated that the subject property was occupied by a former gas station (Ritchey's Union Service Station and Earl's Union 76) from approximately 1950-1970. No information pertaining to the former gas station on the subject property was obtained from the City of Oakland Fire Department, the California EPA-Regional Water Quality Control Board, the California EPA-Department of Toxic Substance Control, Region 2 or Alameda County Environmental Health. The presence of a former gas station on the subject property was interpreted to be a recognized environmental condition. Further investigation was deemed warranted.

1.2 Previous Site Investigations

November 17, 2008 - ACC conducted a ground penetrating radar survey of the site to determine if a UST was present at the Site. The GPR survey did not identify or locate any USTs in the area of the subject property which likely to contain the former UST.

December 2, 2008 - Four exploratory soil borings were advanced at representative locations. Each soil boring was continuously cored to facilitate logging and screening of soils and to obtain soil sample intervals for potential laboratory analysis. Two soil samples were collected from soil boring SB-1, SB-2, and SB-4. No soil samples were collected from soil boring SB-3; refusal was encountered at 2.5 feet

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below ground surface (bgs) in this soil boring. Each of the two soil samples were from each soil boring location were composited for analysis. Three composite soil samples were analyzed for TPHg, benzene, toluene, ethylbenzene, xylenes and MTBE by EPA Method 8260B, and TEPH as diesel and motor oil by EPA Method 8015M. A summary of the results is presented in Table 1, attached.

Based on the analytical results from this sampling event, the samples with constituents detected above their respective ESL are soil samples SB-1 (6.5-7.0) & (17-18), SB-1 (6.58-7.0), SB-2 (5.0-6.0) & (9.5-10.5), SB-2 (5.0-6.0), SB-4 (4.0-5.0) & (10-12) and SB-6 (4.0-5.0).

December 22, 2008 - Seven (7) exploratory soil borings were advanced at select locations. Each soil boring was continuously cored to maximum depths of 20 to 25 feet bgs to facilitate logging and screening encountered soils and to obtain soil sample intervals for potential laboratory analysis. Due to the physical limiting conditions (height restrictions which precluded the use of a truck mounted drilling rig in the garage area, limited access to the courtyard and dense clay soils) continuous coring below 25 feet bgs was not feasible.

Three (3) soil samples were collected from soil borings SB-6, SB-7 and SB-8. However, only two samples from these three soil borings were submitted for analysis (SB-6 (4-5), SB-6 1(9-20), SB-7 (9-10), SB-7 (23-24), SB-8 (5-6) and SB-8 (24-25). Two soil samples were collected from soil borings SB-9, SB-10 and SB-11. Both of the soil samples from these soils boring were submitted for analysis (SB-9 (3-4), SB-9 (15-16), SB-10 (7-8), SB-10 (15-16), SB-11 (7-8) and SB-11 (15-16). Each soil sample was labeled, and stored in a pre-chilled, insulated container to be transported following chain of custody protocol to TestAmerica (formerly STL San Francisco), a state-certified analytical laboratory. The soil samples were analyzed for TPHg, benzene, toluene, ethylbenzene, xylenes and MTBE by EPA Method 8260B and TEPH as diesel and motor oil by EPA Method 8015M. A summary of the results is presented in Table 1, attached.

Based on the analytical results from this sampling event, the only samples with constituents detected above their respective ESL are soil sample SB-6 and the groundwater sample SB-5. Furthermore, the levels detected only slightly exceed their respective ESLs.

All Previous sample locations are provided on Figure 2- Sample Location Map

2.0 **PROPOSED SCOPE OF WORK**

2.1 Soil Contaminant Volatilization to Indoor Air

Based on the analytical results of soil samples collected at the Site, TPHg, TPHd, TPH mo, and benzene were detected at concentrations of 380 mg/kg, 110 mg/kg, 550 mg/kg, <2.2 mg/kg, respectively, above their respective ESLs Furthermore, hydrocarbon odors were noted at shallow depth in many of the soil borings conducted at the site. Based on these findings at the site ACC proposes to collect two (2) soil vapor samples from inside the garage area, one sample from the known area of soil impact and one sample from near SB-7. Two additional soil vapor samples will be collected from the crawl spaces under the residential living units of the subject building. All soil vapor samples will be analyzed for volatile organic compounds including TO-15 using summa canisters.

A full description of this sampling method is described below in Section 3.0.

Proposed soil vapor sample locations are depicted on Figure 3-Proposed Sample Location Map.

2.2 Additional Delineation of Site Geology and Hydrogeology

ACC proposes to conduct six additional soil borings in select locations around the known area of soil impact to further delineate to extent of soil and groundwater impact and to obtain additional information pertaining to the soil lithology at the site.

Four (4) soil-boring locations will be advanced to a depth of 50 feet below ground surface (bgs) or to the depth which groundwater is first encountered. The borings will be located in select areas based on the presumed groundwater flow and within the known main area of soil impact (the presumed former UST location). ACC will collect two (2) representative soil samples from the four (4) soil boring locations. Each of the soil samples will be analyze for lead scavengers (ethylene dicholoride (EDC) and ethylene dibromide (EDB)) by EPA Method 8260B, organic lead, and LUFT 5 Metals by EPA Method 6010B. ACC will also collect representative groundwater samples from each of the four (4) soil boring locations. Each of the four (4) groundwater samples will be analyzed for TPHg, BTEX, MTBE, lead scavengers (ethylene dicholoride (EDC) and ethylene dibromide (EDB)) by EPA Method 8260B, and LUFT 5 Metals by EPA Method 8260B, TEPH by EPA Method 8015M, organic lead, and LUFT 5 Metals by EPA Method 8260B.

ACC will Advance two (2) additional soil borings in the known are of impact in the garage, to a depth of 15 feet bgs. ACC will log and screen soils in the continuously cored soil borings, including screening with a calibrated PID. ACC will collect representative soil samples from the two (2) soil boring locations. The representative soil samples will be analyzed for for lead scavengers (ethylene dicholoride (EDC) and ethylene dibromide (EDB)) by EPA Method 8260B, organic lead, and LUFT 5 Metals by EPA Method 6010B.

All samples collected will have silica gel cleanup run on all samples.

A full description of this sampling method is described below in Section 3.0.

Proposed sample locations are provided on Figure 3-Proposed Sample Location Map.

3.0 SAMPLING METHODS

3.1 Soil Vapor Sampling

At each of the four soil vapor sampling points a 1- to 1.25-inch hole will be drilled to 3 to 4 inches into the sub slab material beneath the building foundation and or the rat proofing material in the crawl space areas using an electric hand drill, and 0.25-inch vapor points consisting of polyethylene tubing with a permeable probe tip will be installed in the cored holes. A TeflonTM disk will be used to seal the joint between the tubing and the probe tip. The probe tip as covered with sand and hydrated bentonite chips will be used to seal the annular air space between the probe tip and the bottom of the building foundation.

Prior to sampling, each soil vapor point will be allowed to equilibrate for approximately 30 minutes. During sample collection at each sampling point, ACC will purge vapor from the tubing, probe tip, and sand pack within the soil gas probe. Each sample point will be purged for 30 seconds prior to sampling.

At the completion of purging, ACC will collect the soil vapor samples by opening the vapor-tight valve on the Summa canister and allowing the canister to fill with extracted soil vapor. ACC will record the vacuum at the time the valve is opened and monitor and record the vacuum during sample collection. ACC will utilize 100% tetrafluoroethance at each sample location as the leak detector tracer gas. ACC will end sample collection when the vacuum within the sample canister is approximately 5 in Hg. All soil vapor sample containers will be labeled and stored at ambient temperature in laboratory-supplied containers. All Soil Vapor Samples will be submitted to Torrent Laboratories for volatile organic compound analysis (VOCs) via EPA method TO-15 Analysis.

Upon completion of the sampling program grouting, sealing with concrete, and resurfacing the floor surface to match its original condition decommissioned the subslab soil gas sampling points.

Subslab sampling will be conducted following guidance criteria for the evaluation and mitigation of subsurface Vapor Intrusion to Indoor Air (Interim Final), published by the Department of Toxic Substance Control of the California Environmental Protection Agency (December 15, 2004, revised February 7, 2005) (DTSC 2005) and Advisory-Active Soil Gas Investigations, jointly issued by the Department of Toxic Substances Control of the California Environmental Protection Agency and the California Regional Water Quality Control Board, Los Angeles Region (CRWQCB-LA, 2003).

3.2 Soil Sampling

The soil samples collected to be conducted to a max depth of 50 (SB-12, SB-13, SB-14, and SB-15) feet bgs will be conducted with either a Portable Sampling Rig equipped with 6-inch hollow stem augers or a SIMCO 4000® Track Mounted Rig equipped with 6-inch hollow stem augers. Select depth intervals will be collected from soil cuttings and logged using the Unified Soil Classification System, field screened with a PID meter, or prepared for analysis. Soil intervals saved for analysis will be immediately placed in stainless steel sampling tubes, with polyethylene sheeting and tight-fitting plastic caps, labeled, placed in resealable plastic bags, and placed in a pre-chilled insulated container and prepared for transport and analysis using standard chain of custody protocol. Soil samples collected for analysis will be in a locked vehicle or in direct observation at all times.

The soil samples collected from the soil borings to be conducted to a max depth of 15 (SB-2A and SB-6A) feet bgs will be conducted with a truck-mounted Geoprobe® rig. These soil borings will be continuously cored using a pneumatic Geoprobe® sampling tool. The soil will be collected in Geoprobe® stainless steel macro cores equipped with Geoprobe®-supplied, 2.0 inch by 48.0 inch disposable clear acetate liners. Select depth intervals will be collected from the 4-foot-long acetate liners and logged using the Unified Soil Classification System, field screened using a PID meter or prepared for analysis. Soil intervals saved for analysis will be immediately placed in stainless steel sampling tubes,

with polyethylene sheeting and tight-fitting plastic caps, labeled, placed in resealable plastic bags, and placed in a pre-chilled insulated container and prepared for transport and analysis using standard chain of custody protocol. Soil samples collected for analysis will be sealed and cooled as soon as feasible to minimize potential volatilization. All samples will be in a locked vehicle or in direct observation at all times. The sampling probe and rods will be pre-cleaned prior to use and between sample drives by washing them with a trisodium phosphate and potable water solution and two potable water rinses.

Prior to conducting all invasive work, ACC will contact Underground Service Alert, underground utility locator to mark all utilities at the subject property. ACC will also obtain a drilling permit from Alameda County Public Works.

3.3 Grab Groundwater Sampling

Grab groundwater samples will be collected with the use of a PVC schedule 40, 1-inch, temporary monitoring wells. Each soil boring will be conducted to the respective depth of interest (50 feet bgs or five feet below the first depth in which groundwater is first encountered) and the temporary monitoring well will be set with a 5-foot long screen. This 5-foot long screen will be exposed to the formation. Grab water samples will be collected using low-flow, low-turbidity techniques and field filtered using 0.45 filters. The amount of sediment and turbidity observed in the water samples will be noted on field logs. Grab groundwater samples collected into laboratory-supplied 40-milliliter sample vials without headspace, and1 liter amber bottles, labeled and immediately sealed and cooled to minimize potential volatilization.

All samples collected will be stored in a pre-chilled, insulated container pending ACC transport to TestAmerica, a state-certified analytical laboratory. Every effort will be made to minimize disturbance of the groundwater samples prior to placement in the sample containers and maintaining the samples at four degrees Celsius prior to analysis. Standard turnaround time for analytical results is 5 working days. However, an expedited turn around time may be elected for the proposed work.

3.4 Sample Containers and Preservation

Soil samples collected will be collected in stainless steel sampling tubes, with polyethylene sheeting and tight-fitting plastic caps. Grab groundwater samples will be collected in laboratory-supplied new glass 40 milliliter glass vials, plastic containers, or 1 liter amber bottles provided by TestAmerica.

Samples will be labeled with pre-printed laboratory-supplied labels, placed in new resealable plastic bags, and immediately placed in a pre-chilled, insulated container maintained at four degrees Celsius pending transport to the analytical laboratory. Each sample cooler will be chilled with ice and no blue ice containers will be used.

3.5 Sample Packaging and Shipment

All samples will be handled according to ACC sampling protocols. Soil samples will be covered at each open end with new polyethylene (Teflon®) sheeting, fitted with tight-fitting plastic caps, labeled, placed in resealable plastic bags, placed in a pre-chilled, insulated container pending transport to ACC's Oakland

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office. ACC will properly refrigerate the samples until they are picked up by the analytical laboratory courier. Standard chain of custody documentation will be maintained at all times. Samples will be submitted to the laboratory within 24 hours of collection.

3.6 Sample Documentation

ACC will utilize a unique sample numbering system to identify sample locations and depths. Each sample will be designated with the following: 1) Unique boring number – "B11"; and 2) maximum depth – "B11-7.5". A sample designated B11-7.5 is therefore a soil sample collected at soil boring location B11 at 7.0-7.5 feet bgs. Each respective sample designation will be placed at the top of the sample label and on each line of the chain of custody form.

Soil samples will be logged and fully described on pre-printed ACC log forms. These log forms are designed to facilitate preparing boring logs for the final report of findings and prompt the ACC field geologist to obtain and document specific types of information.

3.7 Analytical Methods

All samples will be analyzed by TestAmerica in Pleasanton, California. TestAmerica is state certified, certified with the Army Corps of Engineers, and certified with the United States Navy. Select samples will be analyzed for TPHg, BTEX, MTBE, lead scavengers (ethylene dicholoride (EDC) and ethylene dibromide (EDB)) EPA Method 8260B, TEPH by EPA Method 8015M, organic lead, and LUFT 5 Metals by EPA Method 8260B.

3.8 Decontamination

All sampling equipment will be either new disposable equipment or pre-cleaned, stainless steel sampling equipment. Decontamination of the Geoprobe® sampling probes, the 6-inch hollow stem augers, hand auger, and slide-hammer sampler will be performed between sample locations by washing the equipment with a tap water and Alconox cleaning solution, rinsing the equipment with clean tap water, and a final rinse with tap water.

New clean nitrile surgical gloves will be worn at each new sample location and at each new depth at each sample location. Gloves will be replaced before the collection and/or handling of every sample.

3.9 Backfilling Soil Borings

The soil borings will be backfilled with cement slurry consisting of approximately six gallons of water mixed with 94 pounds of Portland cement. The cement slurry will be prepared with an electric mixing rod to minimize cement lumps in the slurry mix. The surface of the soil boring will be covered with approximately 3 to 6 inches of concrete and colored to match the existing surface.

4.0 TECHNICAL REPORTS

A technical report discussing fieldwork, observations and findings, analytical results, conclusions, and recommendations will be prepared for submission to ACEH. The technical report will present a revised Conceptual Site Model, summarize historical findings of the initial subsurface investigations, identify any perceived data gaps and their significance, and present the findings and conclusions of all investigations performed to date.

5.0 SCHEDULE

ACC will perform and complete the work within three weeks upon authorization to proceed from the Client and approval from ACEH.



	Title: Location Map 3761 Park Boulevard Way Oakland, California								
	Figure Number: 1	Scale: None							
07	Project Number: 6783-013.00	Drawn By: JMS							
	A: C: C ENVIRONMENTAL CONSULTANTS 7977 Capwell Drive, Suite 100 Oakland, California 94621 (510) 638-8400 Fax: (510) 638-8404	Date: $10/10/08$ $W \xrightarrow{N} E$ S							

Source: Google Earth, 2007





TABLE 1 Soil and Groundwater Analytical Summary Table 3761 Park Boulevard Way ACC Project Number: 6783-013.01

			Constituents & Concentrations									
Boring ID & Depth			БН	PHd	om-Hd			euenn	audits in pign	lene	2, Dichloroethane	hylene Dibromide (1,2- bromoethane)
(feet bgs)	Sampling Date	Matrix Soil	E	۳ ۲	Ë	5	Be	2	<u>.</u>	Â.	1,2	
SB-1 - (6.5-7.0) & (17-18)	2-Dec-08	(mg/kg)	260	34	55	< 0.98	< 0.98	< 0.98	4.7	8.5	0.98	0.98
SB-1- (6.5-7.0)	2-Dec-08	Soil (mg/kg)	380	NA	NA	NA	<2.2	NA	6.7	NA	<2.2	<2.2
SB-1- (17-18)	2-Dec-08	Soil (mg/kg)	1.4	NA	NA	NA	<0.0049	NA	<0.0049	NA	<0.0049	<0.0049
SB-2 - (5-6) & (9.5-10.5)	2-Dec-08	Soil (mg/kg)	280	90	340	< 0.98	< 0.98	< 0.98	< 0.98	< 2.0	0.98	0.98
SB-2 - (5-6)	2-Dec-08	Soil (mg/kg)	290	NA	NA	NA	< 0.94	NA	NA	NA	0.94	0.94
SB-2 - (9.5-10.5)	2-Dec-08	Soil (mg/kg)	5.7	NA	NA	NA	<0.024	NA	NA	NA	0.24	0.24
SB-4 - (4-5) & (10-12)	2-Dec-08	Soil (mg/kg)	0.33	73	550	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050	0.005	0.005
SB-4 - (4-5)	2-Dec-08	Soil (mg/kg)	NA	NA	NA	NA	< 0.0048	< 0.0048	< 0.0048	<0.0095	0.0048	0.0048
SB-4 - (10-12)	2-Dec-08	Soil (mg/kg)	NA	NA	NA	NA	< 0.0046	< 0.0046	< 0.0046	<0.0093	0.0046	0.0046
SB-5 (15-16)	22-Dec-08	Soil (mg/kg)	< 0.24	< 0.98	< 49	< 0.0047	< 0.0047	< 0.0047	< 0.0047	< 0.0094	0.0047	0.0047
SB-5 (19-20)	22-Dec-08	Soil (mg/kg)	< 0.25	1.4	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.010	0.0050	0.0050
SB-6 (4-5)	22-Dec-08	Soil (mg/kg)	8.1	110	340	< 0.025	< 0.025	< 0.025	< 0.025	< 0.049	0.0250	0.0250
SB-6 (19-20)	22-Dec-08	Soil (mg/kg)	< 0.24	< 0.98	< 49	< 0.0049	< 0.0049	< 0.0049	< 0.0049	< 0.0098	0.0049	0.0049
SB-7 (9-10)	22-Dec-08	Soil (mg/kg)	< 0.25	3.2	< 49	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.010	0.0050	0.0050
SB-7 (23-24)	22-Dec-08	Soil (mg/kg)	< 0.23	< 1.0	< 50	< 0.0047	< 0.0047	< 0.0047	< 0.0047	< 0.0093	0.0050	0.0050
SB-8 (5-6)	22-Dec-08	Soil (mg/kg)	< 0.24	< 0.99	< 50	<0.0048	< 0.0048	< 0.0048	< 0.0048	<0.0095	0.0047	0.0047
SB-8 (24-25)	22-Dec-08	Soil (mg/kg)	0.25	< 0.98	< 49	< 0.0047	< 0.0047	< 0.0047	< 0.0047	< 0.0094	0.0048	0.0048
SB-9 (3-4)	22-Dec-08	Soil (mg/kg)	< 0.24	< 1.0	< 50	< 0.0047	< 0.0047	< 0.0047	< 0.0047	< 0.0094	0.0047	0.0047
SB-9 (15-16)	22-Dec-08	Soil (mg/kg)	< 0.24	< 0.99	< 50	<0.0048	< 0.0048	< 0.0048	< 0.0048	<0.0095	0.0048	0.0048
SB-10 (7-8)	22-Dec-08	Soil (mg/kg)	< 0.25	< 0.99	< 50	< 0.0049	< 0.0049	< 0.0049	< 0.0049	< 0.0099	0.0049	0.0049
SB-10 (15-16)	22-Dec-08	Soil (mg/kg)	0.69	5.9	52	< 0.0047	< 0.0047	< 0.0047	< 0.0047	< 0.0094	0.0047	0.0047
SB-11 (7-8)	22-Dec-08	Soil (mg/kg)	< 0.24	48	53	<0.0048	< 0.0048	< 0.0048	< 0.0048	<0.0097	0.0048	0.0048
SB-11 (15-16)	22-Dec-08	Soil (mg/kg)	< 0.24	< 0.99	< 50	<0.0048	< 0.0048	< 0.0048	< 0.0048	<0.0097	0.0048	0.0048
SB-5 (Water)	22-Dec-08	Water (ug/L)	< 50	220	< 500	< 0.50	< 0.50	< 0.50	< 0.50	< 1.0	0.5000	0.5000
**ESLs - Residential (unrestricted site usage)	Shallow Soil (<u>< 3</u> m)	Soil (mg/kg)	100	100	370	8.4	0.12	9.3	2.3	11	0.0045	0.0003
	Deep Soil (>3 m)	Soil (mg/kg)	180	180	5000	8.4	2	9.3	4.7	11	0.45	0.0003
**ESLs - Commercial site usage	Shallow Soil (<u><</u> 3 m)	Soil (mg/kg)	180	180	2500	8.4	0.270	9.3	4.7	11	0.0045	0.0003
	Deep Soil (>3 m)	Soil (mg/kg)	180	180	5000	8.4	2.0	9.3	4.7	11	0.45	0.0003
**ESLs - Non Drinking Water Source		Water (µg/l)	210	210	210	1800	46	130	43	100	2.00	0.0500
**ESLs - Drinking Water Source		Water (µg/l)	100	100	100	5	1	40	30	20	0.50	0.0500

Notes

**ESLs = Bay Area Regional Water Quality Control Board Environmental Screening Levels (Interim Final May 2008), where groundwater is NOT a source of Drinking Water

NA= Not Analyzed

Bolded and Highlighted Values Exceed Their Respective ESLs