Housing Authority of the
County of Alameda

22941 Atherton Street, Hayward, CA 94541
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July 22, 2015

Alameda County Environmental Health
Local Oversight Program
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Attention: Mr. Mark Detterman

Re: 22941 Atherton Street, Hayward, CA
ACEH Case File: RO#3152

Dear Mr. Detterman:

Please find enclosed the *Request for Case Closure and Water Well Survey*, prepared by SCA Environmental, Inc. (SCA), dated July 22, 2015. We believe SCA to be experienced and qualified to advise us in a technical area that requires a high degree of professional expertise. Therefore we have relied upon SCA's assistance, knowledge, and expertise in their preparation of this report. I am unaware of any material inaccuracy in the information in the report or any violation of government guidelines that are applicable to the report.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Very truly yours,

Christine Gouig
Executive Director

SCA
ENVIRONMENTAL, INC.

July 22, 2015

Mark Detterman
Alameda County Environmental Health Department
1390 Market Street, Suite 210
Alameda, California 94102

RE: Request for Case Closure and Water Well Survey
22941 Atherton Street, Hayward, California
Case Number RO#3152
SCA Project No: B11167.04

Dear Mr. Detterman:

On behalf of the Housing Authority of the County of Alameda (HACA), the property owner, SCA Environmental, Inc. (SCA) presents this Request for Case Closure and Water Well Survey for the subject property in Hayward, California (Figures 1 and 2). Currently, the Site is considered an "open case" by the Alameda County Environmental Health Department (ACEH; Case #RO3152). Based on SCA's recent soil and groundwater investigation at the Site, the Site has been adequately characterized and impacts to soil and groundwater below the former Underground Storage Tanks (USTs) will continue to degrade over time. The following summarizes how Site conditions satisfy the General and Media-Specific Criteria of the Water Board's Low Threat Closure Policy (LTCP).

ASSESSMENT OF LOW-THREAT CLOSURE POLICY CRITERIA

In 2012, the State Water Resources Control Board (SWRCB) adopted the LTCP (Resolution No. 2012-0062) which outlines eight General Criteria and three categories of Media-Specific criteria a Site must satisfy to be a candidate for closure under the policy. The following summarizes how Site conditions satisfy the General and Media-Specific Criteria of the LTCP.

General Criteria

Criteria a - The unauthorized release is located within the service area of a public water system.
The Site is located within the service area of the City of Hayward Water System. According to information obtained from the City of Hayward's website[1], the City purchases their water from the San Francisco Public Utilities Commission (SFPUC). About 85% of the City's water use comes from the Hetch Hetchy watershed in the Sierra Nevada. The remaining 15% is from the Alameda watershed, located in the East Bay and stored in the Calaveras and San Antonio Reservoirs.

As requested by ACEH in their letter dated May 19, 2015, SCA completed a water well survey at the Site, using a radius of 500 feet, in order to determine if public or private water supply wells may be present within an area that the *Technical Justification for Groundwater Media-Specific Criteria* indicates is slightly larger than the 90th percentile plume length for a gasoline TPH plume. Based on the results of the well survey (Appendix A), there are no known municipal or domestic water supply wells located at, or within 500 feet of the Site. The affected groundwater is not currently being used as a source of drinking water and is not likely to be used as a drinking water source in the foreseeable future. Furthermore, SCA's field reconnaissance identified no municipal or domestic wells within the 500 foot radius of the Site.

[1] http://user.govoutreach.com/hayward/faq.php?cid=11195

Criteria b - The unauthorized release consists only of petroleum.
Impacts to soil and groundwater originated from an unauthorized release(s) from the four fuel USTs encountered at the Site. There have been no known non-petroleum impacts or releases documented at the Site. Analyses on soil and groundwater samples collected by SCA detected no chemical concentrations indicative of non-petroleum impacts or releases. Details regarding UST removal activities were presented in SCA's *UST Closure Report* dated October 13, 2014.

Criteria c - The unauthorized ("primary") release from the UST system has been stopped.
On July 8, 2014, HACA's general contractor, Sausal Corporation (Sausal), encountered a UST and soil with a strong diesel fuel odor during rough grading activities outside of the northwestern corner of the existing building. Sausal subcontracted with Controlled Environmental Services (CES), a licensed hazardous waste contractor, to complete UST removal at the Site. During soil excavation, two 1,000-gallon (5' diameter x 7' length: UST-1 & UST-2) and one 1,500-gallon UST (5' diameter x 10' length: UST-3) were encountered and removed from the Site. No holes were observed in UST-1 or UST-2. Two small holes (less than 1/2-inch in diameter) were observed in UST-3. All three USTs and associated 2-inch diameter galvanized piping were transported from the Site by Ecology Control Industries to their yard in Richmond, California under hazardous waste manifest for disposal. Gray staining to soil indicative of an aged hydrocarbon release(s) was observed on the sidewalls and bottom of the southeastern portion of the excavation pit following removal of the three USTs.

During over-excavation to remove stained soil, a fourth UST (UST-4) measuring 9.5 feet in diameter and approximately 20 feet in length was encountered along the south wall of the excavation pit. UST-4 extended approximately 1.5 feet beyond the northwestern portion of the building's structure grade beams. Accordingly, removal of UST-4 was judged to have the potential to adversely impact the structural integrity of the overlying building. In September 2014, UST-4 was triple rinsed, purged, and closed in-place using Control Low Strength Material (CLSM) having an in-place density of approximately 99 pounds/cubic foot. Approximately 54 cubic yards of CLSM was poured into the UST, vibrated, and topped to fill all voids. This work was completed in coordination with, and approval from, the Hayward Fire Department (HFD).

As a result of these activities, the unauthorized, or "primary" release, was stopped with the removal of the three USTs and the closure-in-place of the fourth UST. No groundwater was encountered during UST removal or soil over-excavation activities. No other USTs are present at the Site. SCA summarized the UST removal activities in our report titled *UST Closure Report, Housing Authority of the County of Alameda Property, 22941 Atherton Street, Hayward, California*, dated October 13, 2014.

Criteria d - Free product has been removed to the maximum extent practicable.
No free product was identified during the removal or closure-in-place of the USTs in July-September 2014, or during SCA's soil and groundwater investigation in February 2015. Additionally, concentrations of total petroleum hydrocarbons as gasoline, diesel, and motor oil (TPHg, TPHd, and TPHmo) detected in soil samples collected beneath and in the immediate vicinity of the USTs, or in soil and groundwater samples obtained from the Site, were not indicative of the presence of free product.

Criteria e - A Conceptual Site Model (CSM) that assesses the nature, extent, and mobility of the release has been developed.
To conform with ACEH requirements, SCA prepared and submitted to ACEH a Focused Conceptual Site Model (CSM) in the report titled *Data Gap Investigation Work Plan and Focused Conceptual Site Model, Housing Authority of the County of Alameda Property, 22941 Atherton Street, Hayward, California,* dated December 10, 2014, and amended via email on January 14, 2015. These documents were reviewed and conditionally approved by ACEH in their letter dated January 14, 2015.

Criteria f - Secondary source has been removed to the extent practicable.
SCA summarized the UST removal activities in our report titled *UST Closure Report, Housing Authority of the County of Alameda Property, 22941 Atherton Street, Hayward, California*, dated October 13, 2014. Following removal of the three USTs, the resulting UST pit measured roughly 24-ft x 14-ft x 11-ft deep. Confirmation samples (two below each UST and several sidewall samples) were collected under the direction of HFD on July 31 and August 1, 2014. Gray staining to soil indicative of an aged hydrocarbon release(s) was observed on the sidewalls and bottom of the southeastern portion of the excavation pit.

On August 14, 2014, SCA directed CES to over-excavate portions of the UST pit to complete secondary source removal near the former USTs. A portion of the eastern wall was extended approximately 4 feet, the southern portion of the bottom of the UST pit was excavated to approximately 15 to 19 feet below ground surface (bgs), and the southern wall was extended another 1.5 feet. During the over-excavation activities, the fourth UST was encountered. As removal of this UST was judged to have the potential to adversely impact the structural integrity of overlying building, this UST was closed-in-place and no additional soil was removed. Although the extent of soil excavation was constrained by the fourth UST, excavation resulted in secondary source removal at the Site.

Natural attenuation of residual petroleum hydrocarbon concentrations through adsorption, dispersion, dilution, volatilization, and biological degradation is likely occurring as evidenced by the relatively small lateral extent of groundwater impact at the Site. Primary and secondary source removal, coupled with natural attenuation, will continue to reduce hydrocarbon impacts to soil and groundwater at the Site.

Criteria g - Soil and Groundwater has been tested for MTBE and the results reported in accordance with Heath and Safety Code Section 25296.15.
Results of analyses on soil and grab groundwater samples were presented in SCA's *Site Investigation Completion Report* dated March 24, 2015. Analyses detected no MTBE above the laboratory detection limit in any of the soil or groundwater samples tested.

Criteria h - Does a nuisance exist as defined by Water Code Section 13050.
No nuisance resulting from residual hydrocarbons exists at the Site, as defined by Water Code Section 13050. No petroleum hydrocarbon odors were detected in ambient air during any of SCA's site visits or investigation activities. Site conditions are not injurious to health, are not indecent or offensive to the senses, and do not obstruct free use of property or interfere with the comfortable enjoyment of life or property. Site conditions do not affect an entire community or neighborhood, or any considerable number of persons. Residual impacts to groundwater are restricted to the subsurface, and based on concentration vs. distance graphs (Appendix B), are present in a limited area (less than 350 feet) that does not adversely affect the community at large.

Groundwater was encountered during the investigation in Borings B-1 through B-4 at depths ranging between 54.7 feet bgs (B-1) and 67 feet bgs (B-4). No free phase hydrocarbons were observed during soil or groundwater sampling. We note that underground utilities are typically installed to depths of less than 10 feet below grade. Accordingly, shallow underground utilities do not intercept the shallow groundwater table and therefore will not provide a preferential pathway for contaminant migration.

Media-Specific Criteria

Groundwater
Residual concentrations at the Site do not currently pose a risk to existing or anticipated future beneficial uses of groundwater, and meets the groundwater-specific criteria as outlined by the LTCP. The LTCP states that "the contaminant plume that exceeds water quality objectives (WQO's) must be stable or

decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites." This Site fulfills Groundwater-Specific Criteria 5 as described below:

- Based on the TPH impacts detected in shallow grab groundwater samples collected from the Site in February 2015, the lateral extent of TPH exceeding Water Quality Objectives (WQOs) is less than 350 feet in length. Plotting the TPHd and TPHmo concentrations versus distance in the downgradient and cross-gradient directions (Appendix B), TPHd concentrations in shallow groundwater meet the WQO of 100 micrograms per liter (µg/L) between 115 feet (using Boring B-4 data) and 145 feet (using Boring B-3 data) downgradient of the source area. TPHmo concentrations meet the WQO of 100 µg/L between 190 feet (using Boring B-4 data) and 310 feet (using Boring B-3 data) downgradient of the source area. Considering that the primary and secondary sources have been removed, these findings are indicative of a stable groundwater plume.

- As discussed in General Criteria d, no free product has been identified at the Site either during UST removal activities or during the soil and groundwater investigation.

- The Site is located within the service area of the City of Hayward which purchases its water from the SFPUC. The SFPUC's water supply comes from the Hetch Hetchy watershed in the Sierra Nevada. About 85% of the City's water use comes from the Hetch Hetchy watershed in the Sierra Nevada. The remaining 15% is from the Alameda watershed, located in the East Bay and stored in the Calaveras and San Antonio Reservoirs. As requested by ACEH in their letter dated May 19, 2015, SCA completed a water well survey at the site, using a radius of 500 feet, in order to determine if public or private water supply wells may be present within an area that the *Technical Justification for Groundwater Media-Specific Criteria* indicates is slightly larger than the 90th percentile plume length for a gasoline TPH plume. Based on the results of the well survey (Appendix A), there are no known municipal or domestic water supply wells located at, or within 500 feet of the Site. The affected groundwater is not currently being used as a source of drinking water and is not likely to be used as a drinking water source in the foreseeable future.

- SCA's review of groundwater monitoring reports for facilities in the vicinity of the Site indicates that groundwater in the region flows to the southwest. The nearest surface water body is Ward Creek which is located approximately 930 feet south of the Site. At this location, Ward Creek becomes an underground engineered channel. Given the distance, and that Ward Creek is located cross-gradient from the Site, the residual impacts to groundwater will not pose a threat to surface water.

Based on the analysis of site specific conditions under current and reasonably anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment, and water quality objectives will be achieved within a reasonable time frame.

Petroleum Vapor Intrusion to Indoor Air

This Site satisfies condition 2c. According to SCA's review of the LTCP Checklist (as of 5/26/2015) located on the SWRCB's GeoTracker website[2], the regulatory agency has determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health as a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls.

[2] http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000006327&cmd=ltcpreport&ltcp_id=131406

Direct Contact and Outdoor Air Exposure

As described in the LTCP, sites will meet the Media-Specific Criteria for direct contact with contaminated soil or inhalation of contaminants volatilized to outdoor air if:

1. The maximum concentrations of chemicals of concern in soil are less than or equal to those listed in Table 1 of the LTCP; or
2. A site-specific risk assessment shows that chemicals of concern present in soil will not adversely affect human health; or
3. Exposure to chemicals of concern is mitigated through engineering controls.

All soil samples tested during UST removal activities and during SCA's February 2015 soil and groundwater investigation, including those collected from the upper 10 feet in the vicinity of the USTs, detected no benzene, ethylbenzene, naphthalene, or PAH [benze(a)pyrene toxicity equivalents] concentrations exceeding the residential, commercial/industrial, or utility worker criteria listed in Table 1 of the LTCP. Furthermore, detected benzene and toluene concentrations in grab groundwater samples collected in the near vicinity of the USTs did not exceed Environmental Screening Level (ESL) criteria for potential vapor intrusion concerns as presented in Table E-1 of the San Francisco Bay Regional Water Quality Control Board's December 2013 ESL Guidance document. Accordingly, any exposure via inhalation or the vapor intrusion pathway is considered to be not significant.

No risk assessment is planned at this time based on the current and reasonably anticipated future land use of the Site, and because no water supply wells are impacted, and that the chemicals of concern do not exceed direct contact, outdoor air, or vapor intrusion screening criteria. Furthermore, current and reasonably foreseeable future land uses include commercial use scenarios with no complete soil, soil-vapor, or groundwater contact exposure pathways (i.e., ingestion, dermal contact, and inhalation of particulates).

LIMITATIONS

This document is intended to be used only in its entirety. This report has been prepared for the exclusive use of the Alameda County Environmental Health Department and the Housing Authority of the County of Alameda. No reliance on this report shall be made by anyone other than those for whom it was prepared unless authorized in writing by a Principal of SCA.

SCA's conclusions, recommendations and opinions presented in this report are based solely on the findings of the investigation discussed herein. This report has been prepared in accordance with generally accepted methodologies and standards of practice by environmental professionals performing similar services. No warranty, expressed or implied, is made regarding the findings, conclusions, and recommendations included in the report. Variations in site conditions may exist and conditions not observed or described in this report may be encountered during subsequent activities including additional sampling, excavation, construction, etc.

The findings of this report are valid as of the date of the report. SCA's opinions and recommendations regarding environmental conditions as presented herein are based on limited subsurface assessment and chemical analysis. The samples collected and used for testing, and the observations made, are believed to be representative of the areas evaluated; however, conditions can vary significantly between sampling locations. Variations in the subsurface conditions may exist beyond the areas explored in this evaluation. Additionally, Site conditions may change with time, natural processes, or human intervention, which can invalidate the findings and conclusions presented in this report. As such, this report should be considered a reflection of the current site conditions as based on the investigation and remediation completed.

CLOSING

In SCA's professional opinion, the Site has been adequately characterized and we recommend no further investigation or remedial action for the Site at this time. The primary and secondary sources of hydrocarbon contamination have been removed. Residual petroleum hydrocarbon concentrations will continue to degrade naturally over time. The Site conforms to condition 2c of the LTCP, and does not pose a significant threat to human health or the environment. Therefore, on behalf of the property owner, SCA respectfully requests that ACEH formally approve No Further Action status for the Site and proceed with regulatory case closure.

We trust this provides the information required at this time. Please contact the undersigned if you have any questions.

Sincerely,
SCA ENVIRONMENTAL, INC.

Karen A. Emery, P.G.
Senior Geologist

PROFESSIONAL GEOLOGIST
KAREN A. EMERY
No. 8788
Exp. 10/31/2016
STATE OF CALIFORNIA

Glenn S. Young, P.G., LEED AP
Senior Consultant

PROFESSIONAL GEOLOGIST
GLENN S. YOUNG
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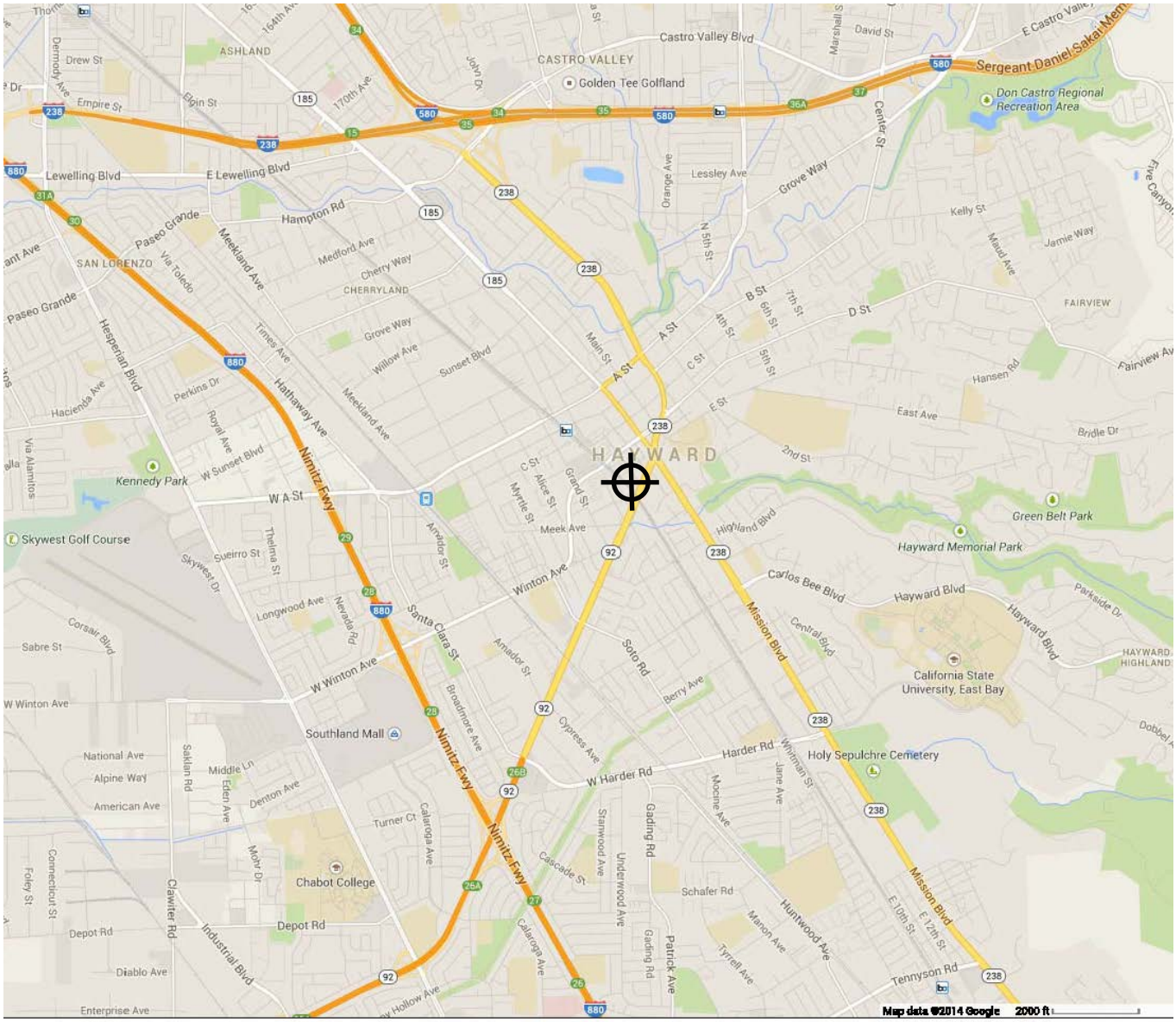
Christina Codemo, REPA, CAC
Principal

KAE/GSY:ke

Copies submitted via email: (1 PDF) Addressee
(1 PDF) Mr. Tom Makin and Mr. George Smith, HACA

Figures 1 and 2
Appendix A – Water Well and Sensitive Receptor Survey
Appendix B – Concentration vs. Distance Graphs

FIGURES



Source: Google Maps			
LEGEND: Target Property N	SCA ENVIRONMENTAL, INC.	**Vicinity Map** Housing Authority of the County of Alameda 22941 Atherton Street Hayward, California SCA Project No.: B11167.04	Figure 1

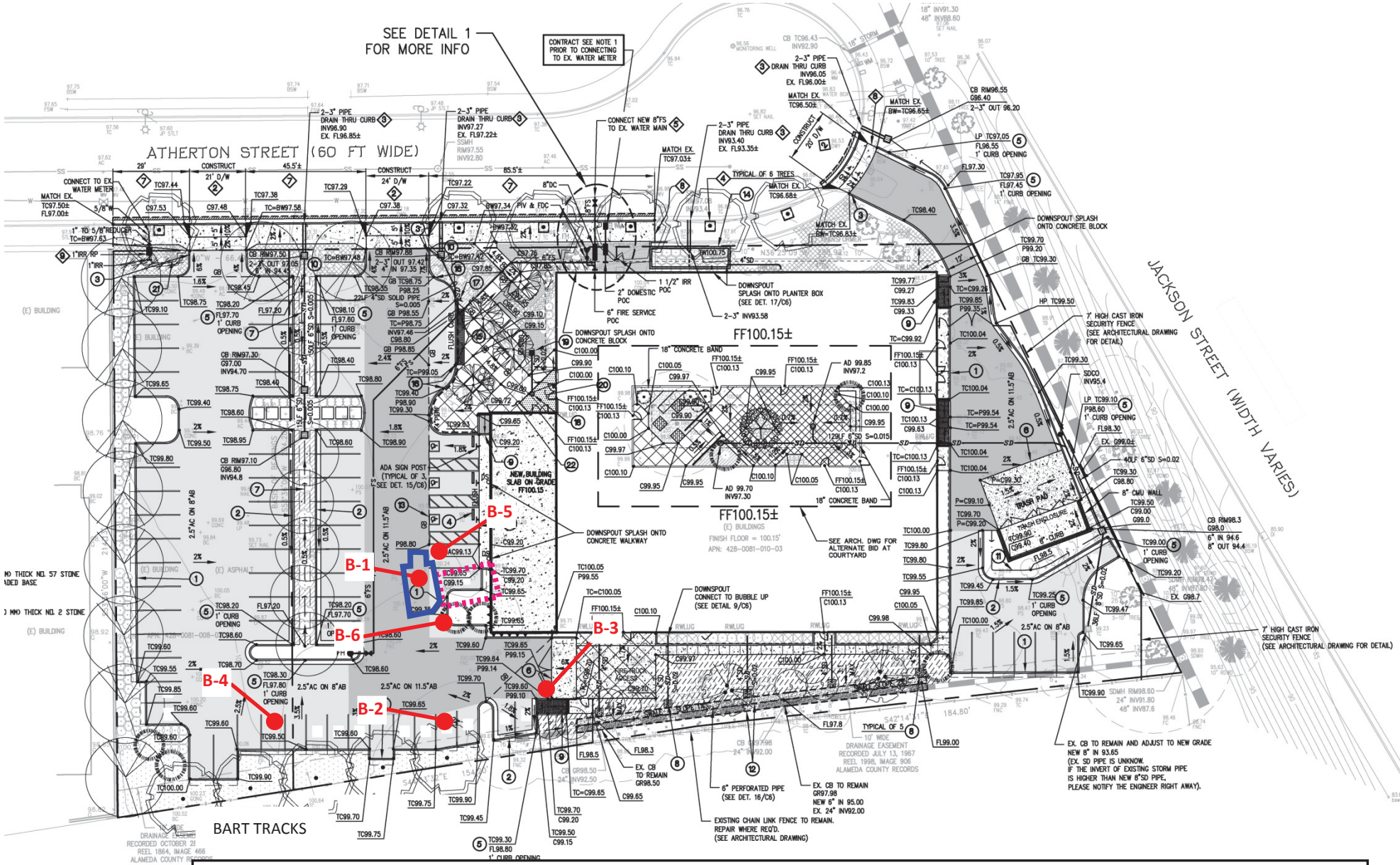


Image Source: Grading and Utility Plan, Alameda County Housing Authority, HACA Office Remodel, Underwood & Rosenblum, Inc., Sheet C3, 2013

SCA ENVIRONMENTAL, INC.

Approximate Site Boundary
Approximate Former UST Area
Approximate Location of UST (closed in place)
Approximate Boring Location

North

1" = 55'
(Approximate Scale)

SITE MAP
Housing Authority of the County of Alameda
22941 Atherton Street
Hayward, California
SCA Project No.: B11167.04

Figure
2

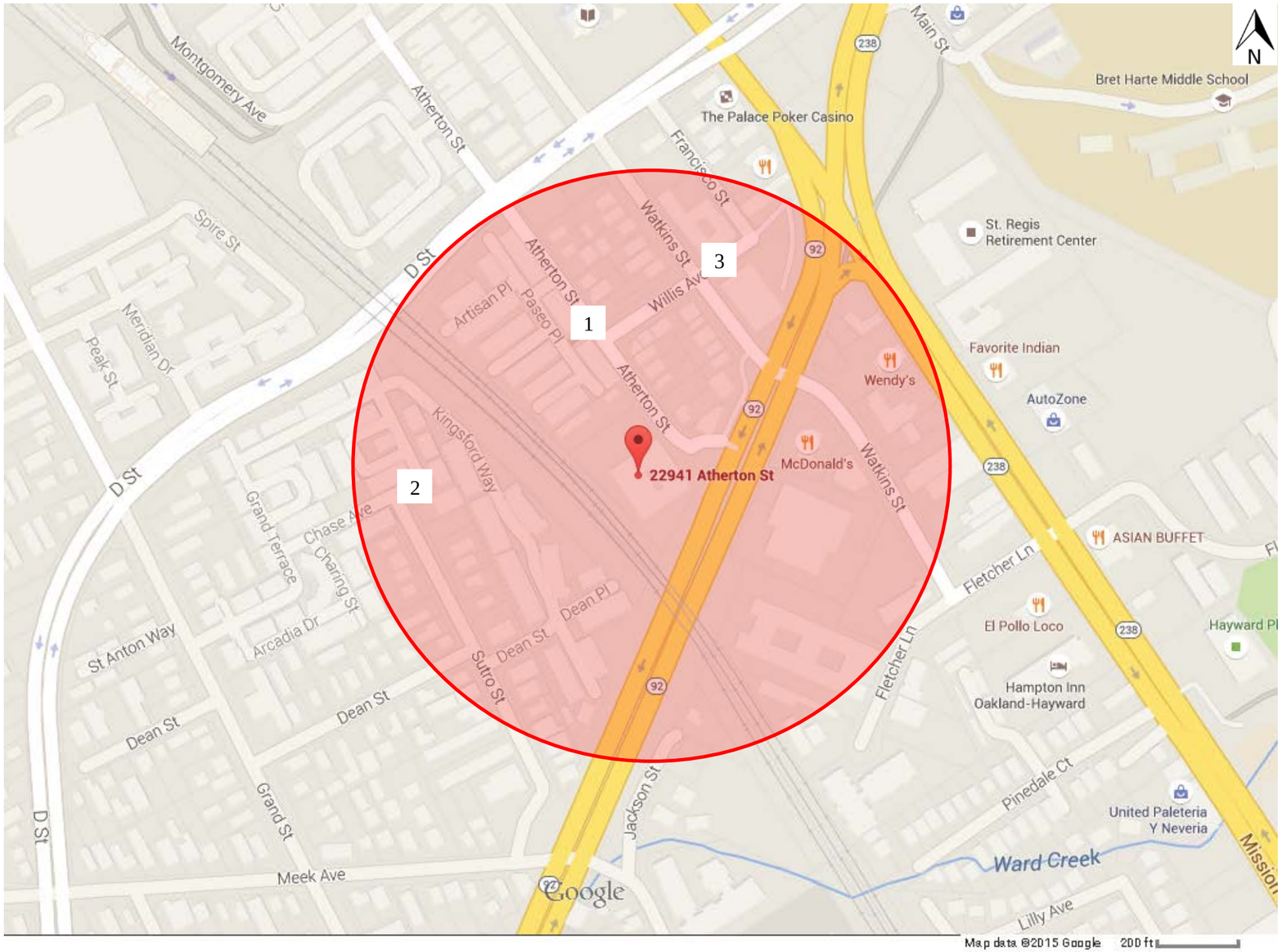
APPENDIX A
WATER WELL AND SENSITIVE RECEPTOR SURVEY

APPENDIX A - WELL AND SENSITIVE RECEPTOR SURVEY		
Item	**Evaluation Criteria**	**Comments/Discussion**
1.	Well Survey Results	**Site:** No known municipal or domestic supply wells are located at or immediately downgradient of the Site. **500 foot radius:** In July 2015, a well survey of active and inactive wells within a 500-ft radius of the Site was obtained through the Department of Water Resources (DWR) and the Alameda County Public Works Agency (ACPWA)[†]. Results indicated no municipal or domestic water supply wells within a 500-ft radius of the Site. SCA also conducted a well reconnaissance within 500 feet of the Site. The approximate locations of known or registered wells are presented on the attached Figure A1.
2.	Shallow Water Wells	**Site:** No shallow water wells are present at the Site. **500 foot radius:** SCA identified the presence of one monitoring well located within the sidewalk along Atherton Street, approximately 180-ft northwest, and cross-gradient of the Site. This well was not identified in the well survey reports researched by SCA. The owner of this well is unknown. Given that this well is cross-gradient, groundwater in this well will not be impacted by residual groundwater contamination at the Site. SCA did not observe any other wells within 500-feet of the Site. According to the Well Survey Reports, one shallow boring (<100 feet) was identified within a 500-ft radius of the Site. This boring was drilled in July 1987 at 22864 Sutro Street, to a depth of 45 feet. No well was installed according to the boring log. SCA visited this site/address in July 2015 and observed that this area has since been redeveloped. This site/address is no longer present. SCA did not observe the presence of any wells in this area. No shallow water supply wells were identified within a 500-ft radius of the Site. The San Francisco Public Utilities Commission (SFPUC) provides potable water to the City of Hayward. Shallow groundwater is not utilized as a water supply, at or in the near vicinity of the Site.
3.	Deep Water Wells	**Site:** No deep water wells are present at the Site. **500 foot radius:** According to the Well Survey Reports, two deep wells (>100 feet) were abandoned in December 1929. The exact location and use of these two wells is unknown. These wells were reportedly located within the northeast quadrant of Township/Range T03S, R02W. The Site is located within the southeast quadrant of the same township/range. As a result, if these two deep wells were still present, they would be situated upgradient of the Site, and outside of the 500-ft search radius. Given that these wells are upgradient, groundwater in these wells (if present) would not

APPENDIX A - WELL AND SENSITIVE RECEPTOR SURVEY		
Item	**Evaluation Criteria**	**Comments/Discussion**
		be impacted by residual contamination at the Site. One other deep well was identified in the Well Survey Reports as located within Willis Avenue, approximately 365-feet northeast and upgradient of the Site. This well was reportedly owned by PG&E, drilled to a depth of 120 feet, and sealed in 1976. SCA visited this location in July 2015 and did not find evidence of a well present. No other deep wells have been identified within a 500-ft radius of the Site. The City of Hayward purchases their potable water from the SFPUC. The SFPUC's water supply comes from the Hetch Hetchy watershed in the Sierra Nevada. About 85% of the City's water use comes from the Hetch Hetchy watershed in the Sierra Nevada. The remaining 15% is from the Alameda watershed, located in the East Bay and stored in the Calaveras and San Antonio Reservoirs. Groundwater is not utilized as a water supply, at or in the near vicinity of the Site.
4.	Evaluation of Potential Impact to Water Wells	No sensitive receptors or water supply wells are present at the Site or within the less than 500-ft area impacted by residual concentrations of TPH in groundwater.

† SCA requested a search of DWR and ACPWA records for wells located within a 500-ft radius of the Site. Of the records returned by both agencies, most were for wells located outside of the 500-ft radius. As requested by ACEH, SCA has located all results within the 500-ft radius on the attached vicinity map and tabulated their addresses. Please note that well construction details are confidential and as a result are not included with this report. Hardcopies of the well construction records are available to ACEH upon request.

SCA ENVIRONMENTAL, INC.



LEGEND:

Area within 500-ft Search Radius

Site No.	No. of Wells	Use	Address	Distance / Direction	Comments
1	1	Monitoring	Sidewalk, west side of Atherton Street	180 ft / NW / Cross-gradient	SCA walked along Atherton Street and observed evidence of a monitoring well in the sidewalk. It is located approximately 180 feet northwest of the site. This well was not identified in the well survey. Owner of the well is unknown. No other wells were observed in the vicinity of this monitoring well.
2	0	Boring	22864 Sutro Street	325 ft / SW / Downgradient	Boring Drilled in July 1987 to a depth of 45 feet bgs. No well installed according to boring log. SCA visited this site/address in July 2015 and this area has been redeveloped. Site/address no longer present. SCA did not observe the presence of any wells in this area.
3	1	Unknown	Intersection of Watkins Street & Willis Avenue	365 ft / NE/ Upgradient	Drilled to 120 ft and sealed in 1976. SCA visited this location in July 2015 and did not find evidence of a well present.
Unknown Location	2	Unknown	Unknown address. Located in NE Quadrant of T03S, R02W	Unknown / NE / Upgradient	Well abandoned in December 1929. According to DWR well completion report, this well was located in the northeast quadrant of T03S, R02W. As 22941 Atherton Street is situated in the southeast quadrant of the same township/range, these wells, if present would upgradient and would be situated outside of the 500-ft search radius.

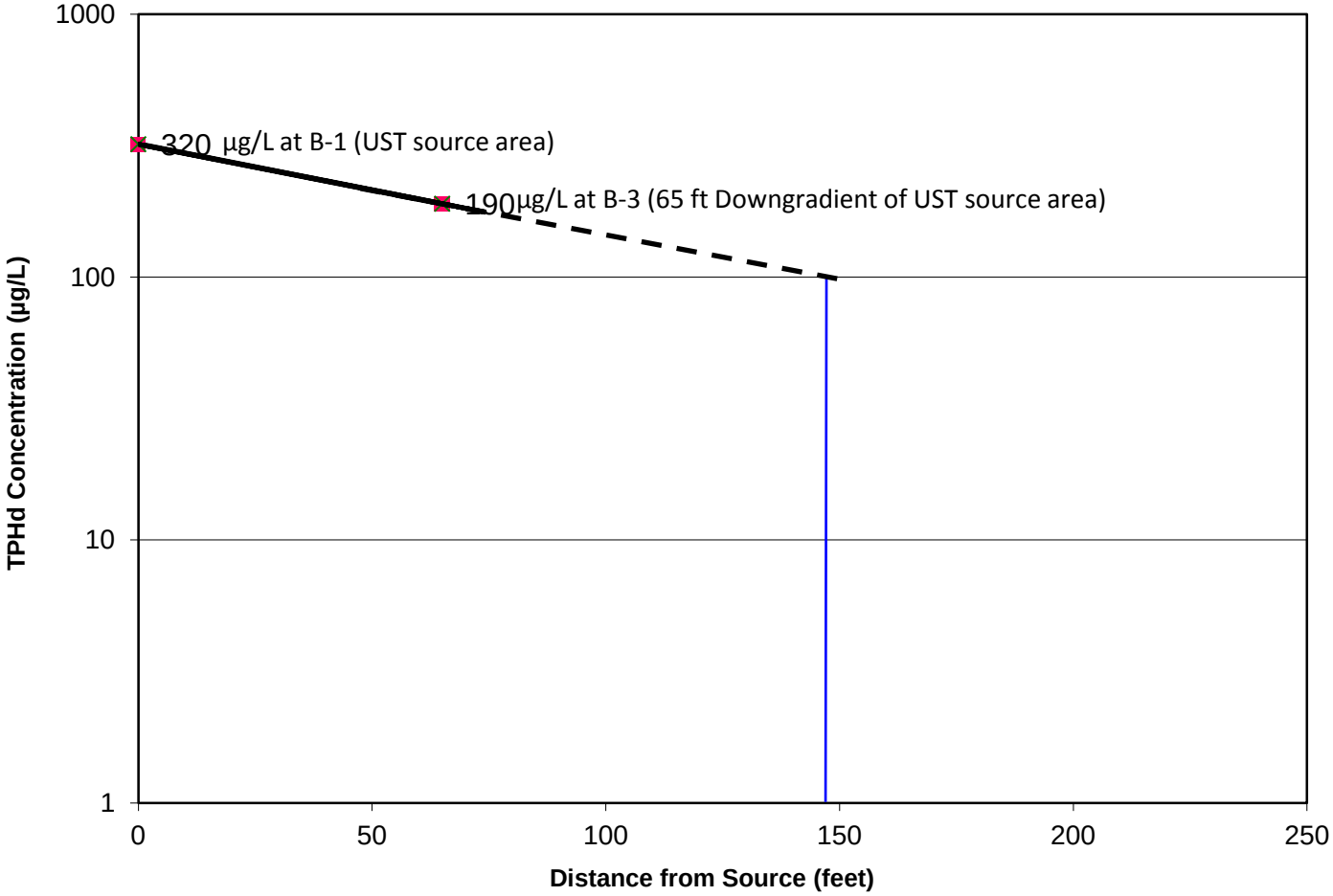
Source: Google Maps

WATER WELL SURVEY SEARCH RESULTS
Housing Authority of the County of Alameda
22941 Atherton Street
Hayward, California
SCA Project No.: B11167.04

Figure
A1

APPENDIX B
CONCENTRATION VS. DISTANCE GRAPHS

22941 Atherton Street
TPHd Concentration vs. Distance



$y = 320e^{-0.008x}$
$R^2 = 1$

TPHd

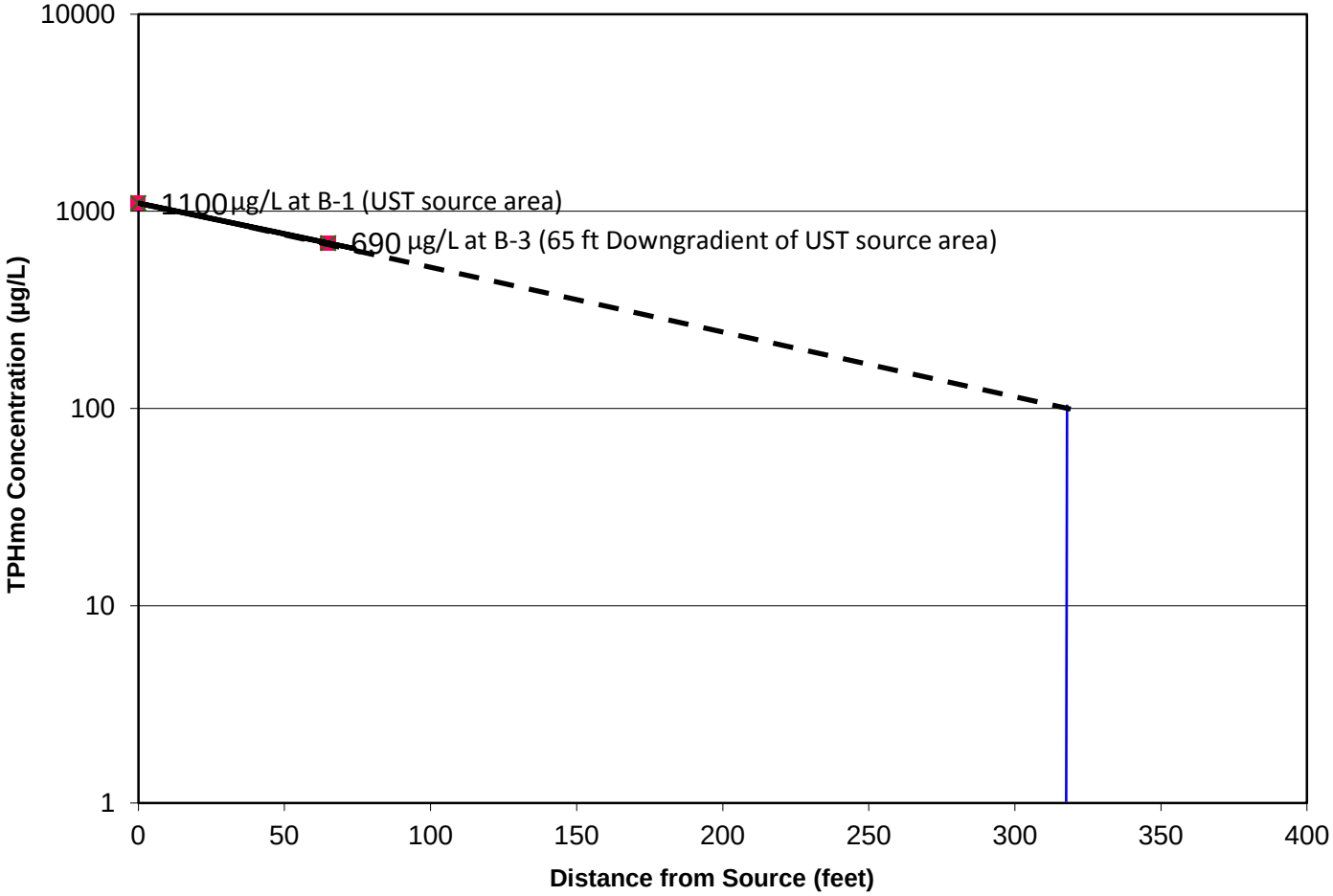
The TPHd concentration is estimated to meet the ESL of 100 µg/L at approximately 145 feet downgradient of the UST source area.

Note: No BTEX, MTBE, or Naphthalene concentrations exceed Tier 1 ESL criteria at a distance of 65 feet downgradient of the UST source area.

TPHd vs Distance Graph

22941 Atherton Street
TPHmo Concentration vs. Distance

SCA ENVIRONMENTAL, INC.



$y = 1100e^{-0.007x}$
$R^2 = 1$

TPHmo

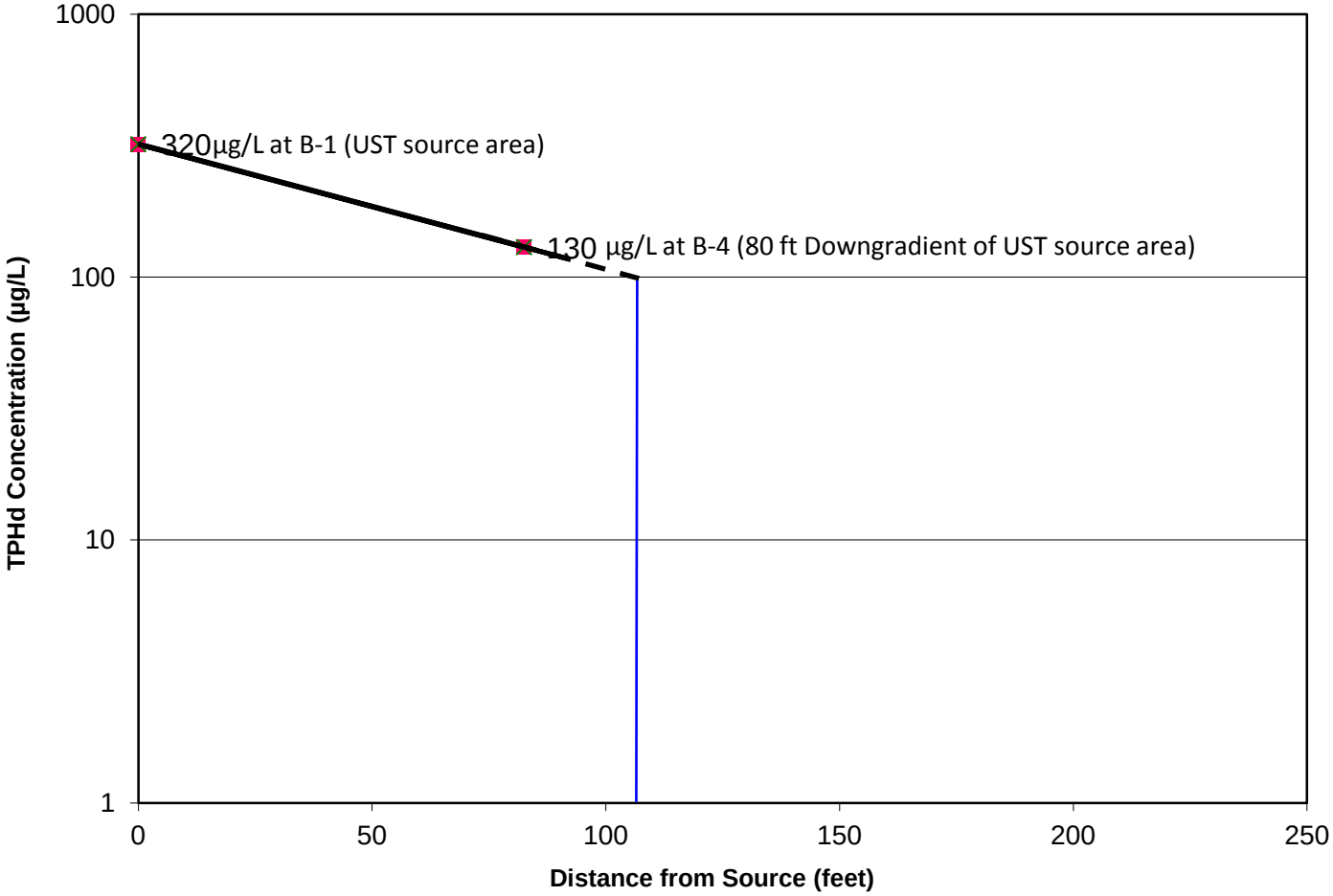
The TPHmo concentration is estimated to meet the ESL of 100 µg/L at approximately 310 feet downgradient of the UST source area.

Note: No BTEX, MTBE, or Naphthalene concentrations exceed Tier 1 ESL criteria at a distance of 65 feet downgradient of the UST source area.

TPHmo vs Distance Graph

22941 Atherton Street
TPHd Concentration vs. Distance

SCA ENVIRONMENTAL, INC.



$y = 320e^{-0.011x}$
$R^2 = 1$

TPHd

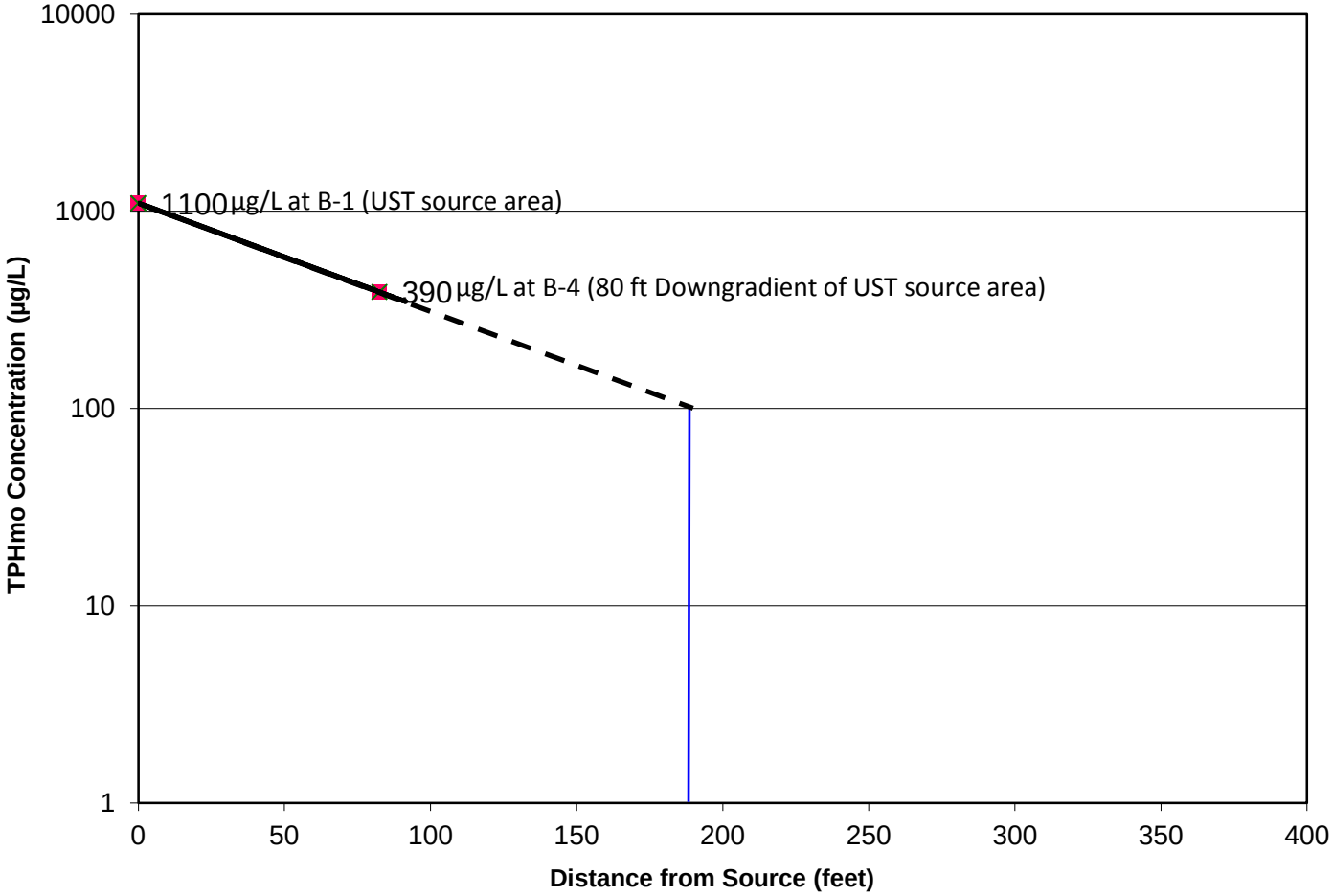
The TPHd concentration is estimated to meet the ESL of 100 µg/L at approximately 115 feet downgradient of the UST source area.

Note: No BTEX, MTBE, or Naphthalene concentrations exceed Tier 1 ESL criteria at a distance of 80 feet downgradient of the UST source area.

TPHd vs Distance Graph

22941 Atherton Street
TPHmo Concentration vs. Distance

SCA ENVIRONMENTAL, INC.



$y = 1100e^{-0.013x}$
$R^2 = 1$

TPHmo

The TPHmo concentration is estimated to meet the ESL of 100 µg/L at approximately 190 feet downgradient of the UST source area.

Note: No BTEX, MTBE, or Naphthalene concentrations exceed Tier 1 ESL criteria at a distance of 80 feet downgradient of the UST source area.

TPHmo vs Distance Graph