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10:36 am, Jun 05, 2009

Alameda County Environmental Health



76 Broadway Sacramento, California 95818

June 3, 2009

Barbara Jakub Alameda County Health Agency 1131 Harbor Bay parkway, Suite250 Alameda, California 94502-577

Re:

Work-Plan Additional Site Assessment 76 Service Station # 5043 RO # 0219 449 Hegenberger Road Oakland, CA

Dear Ms. Jakub:

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

If you have any questions or need additional information, please call me at (916) 558-7666.

Sincerely,

Terry L. Grayson Site Manager

Risk Management & Remediation

June 4, 2009

Ms. Barbara Jakub Hazardous Materials Specialist Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

RE: Work Plan - Additional Site Assessment 76 Station No. 5191/5043 449 Hegenberger Road Oakland, California Fuel Leak Case No. RO00000219



Dear Ms. Jakub:

On behalf of Conoco Phillips Company (COP), Delta Consultants (Delta), has prepared this work plan as directed by the Alameda County Health Care Services Agency (ACHCSA) in a letter dated April 3, 2009 proposing a soil and groundwater investigation to assess the current vertical extent of previously identified petroleum hydrocarbon impact in the vicinity of former monitoring wells MW-1 and MW-2. In addition, a utility survey is proposed to be conducted to determine not only the location, but the depth of any utilities in the vicinity of the site located at 449 Hegenberger Road in Oakland, California that may be acting as preferential pathways. A copy of the ACHCSA letter is presented as Attachment A. The site location is shown on Figure 1.

To assess the extent of the petroleum hydrocarbon impact in the soil and groundwater beneath the site and for vertical delineation, Delta recommends that two (2) borings (B-4 and B-5) be advanced at the site to a depth of approximately 20 feet bgs. The locations of the proposed borings are shown on Figure 2. The two (2) borings will be advanced in the vicinity of former monitoring wells MW-1 and MW-2 south and east of the dispenser islands. Depth-discrete soil and groundwater samples will be collected and submitted for analysis from each boring to help better understand the subsurface conditions and the extent of the petroleum hydrocarbon impact down-gradient of the fuel dispensers.

Previously, Delta submitted maps showing utility locations to the ACHCSA. However, the maps did not contain information on the depths of the indicated utilities. Therefore, during this investigation, Delta proposes returning to the site with a utility locator to determine the depth of the utilities in the vicinity of the site.



SITE BACKGROUND AND DESCRIPTION

October 1991 - Four soil samples were collected from the product pipe trenches at depths of approximately 3 feet below ground surface (bgs) during a dispenser island modification. The product pipe trenches were subsequently excavated to the groundwater depth at 4 to 4.5 bgs.

<u>February 1992</u> - Three monitoring wells, MW-1 through MW-3, were installed at the site to depths ranging from 13.5 to 15 feet bgs.

<u>August 1992</u> - Three additional monitoring wells, MW-4 through MW-6, were installed at the site to a depth of 13.5 feet bgs.

<u>September 1994</u> - One 280-gallon waste oil UST was removed from the site. The tank was made of steel, and no apparent holes or cracks were observed in the tank. One soil sample was collected from beneath the former tank at a depth of approximately 9 feet bgs. No petroleum hydrocarbons were reported.

<u>January 1995</u> - Two additional monitoring wells, MW-7 and MW-8, were installed at the site to a depth of 13 feet bgs. In addition, two existing monitoring wells were destroyed in order to accommodate the construction of a car wash at the subject site. Monitoring wells MW-4 and MW-5 were fully drilled out and backfilled with neat cement.

March 1995 - Two 10,000-gallon gasoline USTs and one 10,000-gallon diesel UST were removed from the site. Groundwater was encountered in the tank cavity at a depth of approximately 8.5 feet bgs. Soil samples contained low levels of total petroleum hydrocarbons as diesel (TPHd) and benzene, and moderate levels of total petroleum hydrocarbons as gasoline (TPHg). Approximately 125,000 gallons of groundwater were pumped from the site for remediation and properly disposed off-site. Four dispenser islands and associated product piping were also removed. Based on the results of the confirmation samples, the product dispenser islands were over excavated to approximately 6 feet bgs.

<u>March-April 1995</u> - During demolition activities of the former station building, soil samples were collected from two excavations, which were subsequently over excavated. Confirmation samples contained low levels of petroleum hydrocarbons. An additional area on the south side of the former station building was excavated based on photoionization detector (PID) readings. Two monitoring wells, MW-1 and MW-2, were destroyed in order to allow for over excavation activities to extend to an area adjacent to the dispenser islands in the southeastern quadrant of the site. The excavated areas were subsequently backfilled with clean-engineered fill.

<u>April 1997</u> - Two additional monitoring wells, MW-9 and MW-10, were installed in the vicinity of the site to depths of 13 to 15 feet bgs. In addition, monitoring well MW-3, which was damaged during the UST cavity over excavation in 1995, was fully drilled out and reconstructed in the same borehole.

October 2003 - Site environmental consulting responsibilities were transferred to TRC.

April 8-9, 2005 - TRC conducted a 24-hour dual phase extraction (DPE) event at the site using monitoring well MW-6. The 24-hour DPE event was moderately successful at

removing vapor-phase petroleum hydrocarbons from the subsurface; therefore, TRC recommended DPE no longer be considered a viable remedial alternative for the site.

October 2007 - Site environmental consulting responsibilities were transferred to Delta Consultants.

REMEDIATION STATUS

Remediation is not currently being conducted at the site.

SITE CONDITIONS

The subject site is an operating 76 service station located on the southwestern corner of Hegenberger Road and Edgewater Drive in Oakland, California. Station facilities include three underground storage tanks (USTs), four dispenser islands, and a station building. A total of six groundwater-monitoring wells are located at or near the site.

The site is underlain by Holocene-age Bay Mud. The Bay Mud typically consists of unconsolidated, saturated clay and silty clay that is rich in organic material. The Bay Mud locally contains lenses and stringers of well-sorted silt, sand, and beds of peat.

Based on the results of historical subsurface investigations performed at the site, the site is underlain by artificial fill materials that extend to approximately 2 to 4.5 feet below grade. The fill materials are underlain by Bay Mud, which consists predominantly of organic-rich silty clay and clayey silt, with minor interbeds of sand, peat, sandy silt, and silty clay (KEI, 1995).

The most recent monitoring and sampling event was conducted at the site on March 27, 2009. The measured depth to groundwater ranged from 2.01 feet to 4 feet below top of casing (TOC). The groundwater flow direction was southeast with a hydraulic gradient of 0.006 foot per foot.

During the first quarter 2009 groundwater sampling event, TPHg was reported in three of the six monitoring wells sampled with a maximum concentration of 150,000 micrograms per liter (μ g/L) in monitoring well MW-6. Methyl tertiary-butyl ether (MTBE) was reported in one of the six monitoring wells sampled at a concentration of 50 μ g/L (MW-3). Benzene was reported in two of the six monitoring wells sampled with a maximum concentration of 1,300 μ g/L in monitoring well MW-6. The primary constituents of concern are TPHg, benzene, and MTBE. In general, concentrations of TPHg, benzene, and MTBE have decreased since the initiation of groundwater monitoring at the site in 1997.

SENSITIVE RECEPTORS

April 24, 2006 TRC completed a sensitive receptor survey for the site. According to the Department of Water Resources (DWR) records, three water supply wells are located within a one-half mile of the site. In addition, two surface water bodies were observed within a one-half mile radius of the site. San Leandro Creek is located approximately 1,400 feet southwest of the site and flows into San Leandro Bay. Elmhurst Creek is located approximately 2,220 feet north of the site and also flows into San Leandro Bay.

PROPOSED ACTIVITIES

Permitting, Utility Notification and Borehole Clearance

Before commencing field activities Delta will prepare a Health and Safety Plan in accordance with state and federal requirements for use during on-site assessment activities. In addition, drilling permits will be obtained for the borings from the Alameda County Public Works Agency (ACPWA). Prior to drilling, Underground Service Alert (USA) will be notified as required and a private utility locator will be contracted to clear the proposed drilling locations for underground utilities.

Soil Boring Advancement and Sampling

Delta proposes to advance two (2) exploratory borings (B-4 and B-5) down-gradient of the fuel dispensers, in the vicinity of former monitoring wells MW-1 and MW-2 using a drill-rig equipped with 8-inch outside diameter hollow-stem augers. The borings will be advanced to a depth of approximately 20 feet bgs or until auger refusal.

Soil samples will be logged using the Unified Soil Classification System (USCS) for lithologic interpretation and field screened for the presence of volatile organic compounds by headspace analysis using a pre-calibrated PID. Soil samples will be collected continuously for lithological interpretation and field screening. First water is anticipated to be at a depth of approximately 2 to 4 feet bgs. At a minimum, soil samples with the highest PID readings, indications of changes in lithology, and the bottom of the borehole from each boring will be submitted for analysis. A chain-of-custody will accompany the samples during transportation to the laboratory. The collected soil samples will be analyzed for TPHd by Environmental Protection Agency (EPA) Method 8015M (silica gel treated), TPHg by EPA Method 8015M, benzene, toluene, ethylbenzene, and total xylenes (BTEX), (fuel oxygenates) MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), (lead scavengers) 1,2-dichloroethane (1,2-DCA) and ethylene di-bromide (EDB), and ethanol by EPA Method 8260.

Depth discrete grab groundwater samples will be obtained using a Hydropunch® sampling tool. Single-use disposable sampling equipment will be used where possible and non-disposable sampling equipment will be decontaminated between samples in a non-phosphate detergent and double rinsed with potable water.

Groundwater samples obtained from the borings will be decanted into properly labeled sample bottles and placed on ice pending transportation to the laboratory. A chain-of-custody will accompany the samples during transportation to the laboratory. The groundwater samples will be placed into the appropriate sample bottles labeled with a unique identification number. The samples will then be placed into an ice-chilled cooler and transported to a California-certified analytical laboratory with chain of custody documentation. The groundwater samples will also be analyzed for TPHd by EPA Method 8015M (silica gel treated), TPHg by EPA Method 8015M, BTEX, (fuel oxygenates) MTBE, DIPE, ETBE, TAME, and TBA, (lead scavengers) 1,2-DCA, and EDB, and ethanol by EPA Method 8260.

Subsequent to sample collection, the borings will be backfilled to the surface with neat cement.

Disposal of Drill Cuttings and Wastewater

Drill cuttings and decontamination water generated during soil boring activities will be placed into properly labeled 55-gallon Department of Transportation (DOT) approved steel drums and temporarily stored on the property. Samples of the drill cuttings and wastewater will be collected, properly labeled and placed on ice for submittal to a California-certified laboratory and analyzed for TPHg by EPA Method 8015M, BTEX and MTBE by EPA Method 8260B and total lead by EPA Method 6010B. A chain-of-custody will accompany the samples during transportation to the laboratory. Subsequent to receiving the laboratory analytical results, the drummed drill cuttings and wastewater will be profiled, transported, and disposed of at a COP approved facility.

Utility Survey

As discussed above, Delta previously generated a map showing the location of underground utilities in the vicinity of the site based on information obtained from the utility companies. However, this map did not indicate the depths of the utilities. Therefore, during this investigation, Delta will return to the site with a private utility locator to mark out all underground utilities in the vicinity of the site and their depths. Subsequent to this work an updated map will be prepared showing the underground utility locations and their depths.

Reporting

Following completion of the field work and receipt of analytical results, a site investigation report will be prepared and submitted within 60 days. The report will present the details of the boring activities, including copies of boring permits, and details of disposal activities and copies of disposal documents. Required electronic submittals will be uploaded to the State Geotracker database.

REMARKS/SIGNATURES

The recommendations contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The Contract between Delta and its client outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report will be performed. This report is intended only for the use of Delta's Client and anyone else specifically listed on this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

If you have any questions regarding this project, please contact me at (916) 503-1261 or Mr. Terry Grayson of ConocoPhillips at (916) 558-7666.

76 Service Station No. 5191/5043

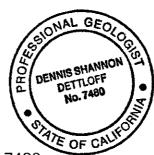
Sincerely,

DELTA CONSULTANTS

Dennis S. Dettloff, P.G.

Senior Project Manger

California Registered Professional Geologist No. 7480



Figures

Figure 1 - Site Location Map

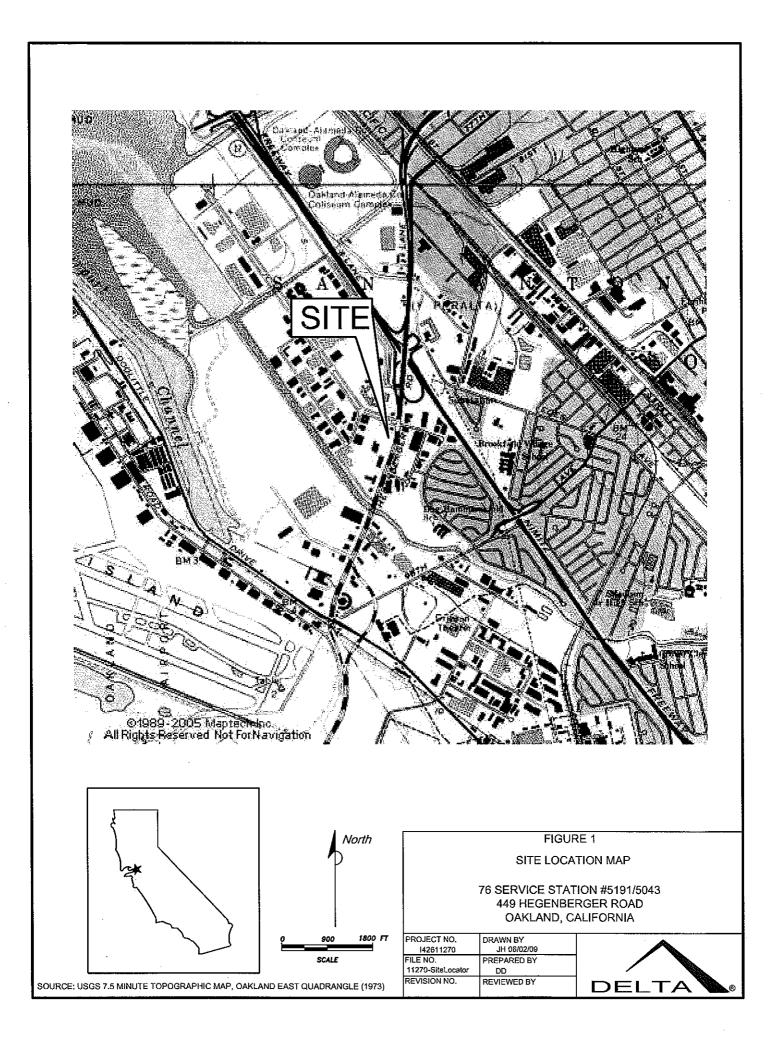
Figure 2 - Site Plan

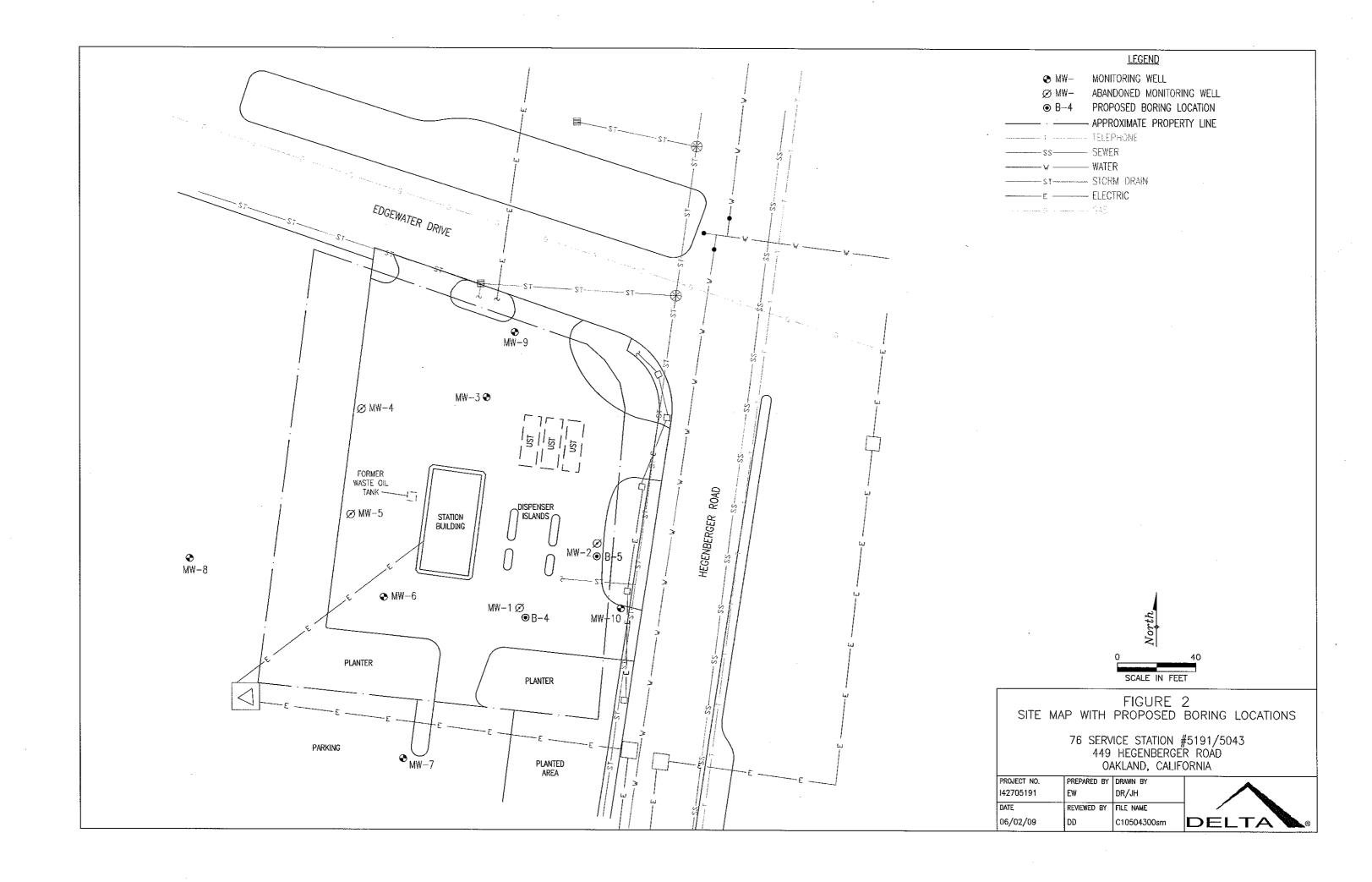
Attachments

Attachment A - ACHCSA Letter

cc: Mr. Terry Grayson, ConocoPhillips (electronic copy only)

FIGURES





ATTATCHMENT A ACHCSA Letter

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RECEIVED

April 3, 2009

APR 1 3 2009

Mr. Terry Grayson ConocoPhillips 76 Broadway Sacramento, CA 95818

Subject: Fuel Leak Case No. RO00000219 and Geotracker Global ID T0600101476, Unocal #5043, 449 Hegenberger Rd., Oakland, CA 94621

Dear Mr. Grayson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, *Work Plan for Hydrogen Peroxide Injection*, dated January 6, 2009 prepared by Delta. The work plan recommends injecting hydrogen peroxide into well MW-6 and monitoring well MW-7 and MW-8 for performance monitoring purposes. ACEH does not concur with injection into a monitoring well that is not designed for remediation and without an adequate performance monitoring network. Additionally, it appears that the extent of the plume has not been defined since previously installed wells MW-1 and MW-2 contained free product and had high contamination concentrations, respectively. The two wells were decommissioned in 1995 and never replaced leaving the area with the highest concentrations unmonitored. Therefore, we cannot approve your work plan. Additional work to define the extent of contamination is required before any remediation test can be approved. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- Extent of Groundwater Contamination Plume In 1995 two wells (MW-1 and MW-2) located near the dispenser islands were decommissioned to allow for overexcayation of the dispenser islands. Prior to destruction, MW-1 contained free product and MW-2 had high contamination concentrations and as such contained the highest contamination levels on the site. No wells were reinstalled in this area to determine the post excavation dissolved contaminant concentrations. Please present your plan to assess groundwater in report requested below.
- 2. Vertical Extent of Contamination Soil samples collected at the site from the soil borings were collected only from depths between 2.5 to 6 feet below ground surface (bgs). Maximum concentrations of 14,000 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as gasoline (TPHg) and 160 mg/kg benzene were detected in MW-1 from 2.5 feet bgs. No additional samples were collected to determine if contaminants have migrated vertically. In

Mr. Grayson RO0000219 April 3, 2009, Page 2

addition, confirmation soil samples from the overexcavation performed in 1995 have not been submitted to the ACEH ftp site. Please address this data gap in the work plan requested below and submit results of confirmation sampling after overexcavation by the dates requested below.

- 3. Site Conceptual Model -At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:
 - (1) Local and regional plan view maps placed on a base map which shows an aerial photograph that illustrates the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
 - (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
 - (3) Regional and local geology and hydrogeology;
 - (4) Plots of chemical concentrations versus time;
 - (5) Plots of chemical concentrations versus distance from the source;
 - (6) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
 - (7) Well logs, boring logs, and well survey maps;
 - (8) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in our December 11, 2006 correspondence and all data gaps identified in the SCM.

4. Utility Survey. The utility survey presented did not include the depth of many of the utilities such as storm drains. Please include updated maps and cross-sections with the utility depths in the report requested below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains only the electronic files listed on our website at http://www.acgov.org/aceh/index.htm. You are requested to submit copies of all other reports and correspondence related to environmental investigations for this property (including Phase I reports) by May 8, 2009.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the following schedule:

June 5, 2009 –SCM with Work Plan

Mr. Grayson RO0000219 April 3, 2009, Page 3

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

Mr. Grayson RO0000219 April 3, 2009, Page 4

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara Jakub, 4.G.

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: John Reay, Delta, 11050 White Rock Rd., Suite 110, Rancho Cordova, CA, 94670

Donna Drogos, ACEH Barbara Jakub, ACEH

File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)

ISSUE DATE: July 5, 2005

REVISION DATE: March 27, 2009

PREVIOUS REVISIONS: December 16, 2005.

October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a single portable document format (PDF)
 with no password protection. (Please do not submit reports as attachments to electronic mail.)
- It is preferable that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements must be included and have either original or electronic signature.
- Do not password protect the document. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. Documents with password protection will not be accepted.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org

Or

- ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
- b) In the subject line of your request, be sure to include "ftp PASSWORD REQUEST" and in the body of your request, include the Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by Report Upload. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO# use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

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