

December 14, 2004

Mr. Fred Schifferle Vice President Bank of America, N.A. Building D 2000 Clayton Road Concord, California 94520-2425

Reference: Groundwater Monitoring Report November 2004

2585 Nicholson Street in San Leandro, California

ES# 305582

Versar Project No. 104422.4422.005

Dear Mr. Schifferle:

Versar, Inc. (Versar) has prepared this groundwater monitoring report on behalf of Bank of America, N.A. (Bank of America) summarizing work performed at the property located at 2585 Nicholson Street in San Leandro, California (Site). Figures 1 and 2 in Attachment I, present the Site location and Site layout, respectively.

Background

A release of petroleum constituents was discovered at the Site during removal of underground storage tanks (USTs) in 1991. Subsequently, Versar and others have performed an investigation of soils and groundwater beneath the Site, and extensive groundwater monitoring. The results of the groundwater monitoring and data evaluation has determined the constituents identified in groundwater are naturally degrading over time, and pose no risk to Site occupants under an industrial setting.

The Alameda County Health Care Services (ACHCS) is currently considering granting closure for the Site. In the interim, the groundwater monitoring program has been reduced to one well (MW-1) on a semi-annual basis.

November 2004 Results

Monitoring well MW-1 was sampled on November 4, 2004. The methodology and protocol followed for the collection of the groundwater sample during this groundwater sampling event are presented in Attachment IV, Decontamination and Groundwater Monitoring Well Sampling Procedures. A monitoring well purge table documenting field measurements during sampling is presented in Attachment II. The groundwater sample from MW-1 was analyzed for total petroleum hydrocarbons (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) by

3202-03/104422.4422.005/Dec'04

Mr. Fred Schifferle December 14, 2004 Page 2 of 2

EPA Methods 8015 Modified and 8021, respectively. Laboratory analytical data sheets are included in Attachment III. Current and historic analytical results from all Site monitoring wells are presented in Table 1 of Attachment I.

As shown in Table 1, analytical results from MW-1 in November 2004 are lower than the previous April 2004 results. The April and November 2004 data suggest that residual concentrations of petroleum are not degrading sufficiently to obtain low risk closure of the site. Versar suggests an application of Oxygen Releasing Compound (ORC) to MW-1 and the adjacent area to expedite closure of the site. If you have any questions, please feel free to call me at (916) 863-9323.

Prepared by:

Tim Berger, R.G. Program Manager Southwest Region

Attachment I - Figures and Tables

Attachment II - Monitoring Well Purge Table

Attachment III - Laboratory Analytical Data Reports

Attachment IV - Decontamination and Groundwater Monitoring Well Sampling Procedures

cc: Amir Gholami (Alameda County)

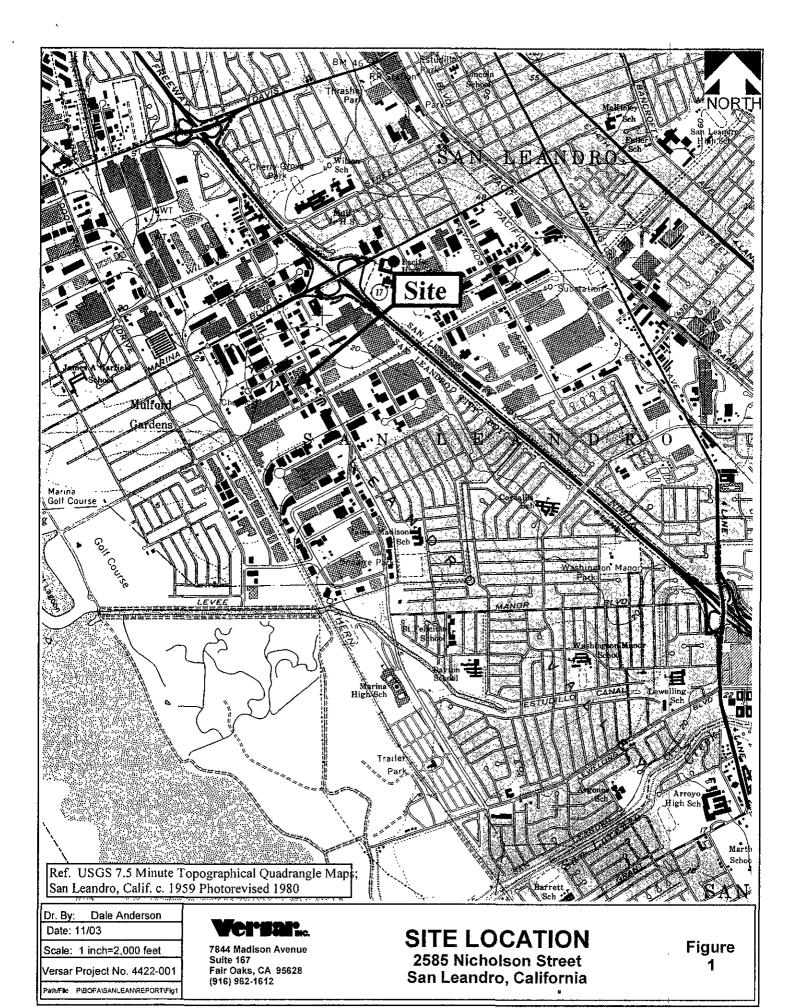
Susan Hugo (Alameda County)

Mike Bakaldin (City of San Leandro)

Donna Proffitt, R.G.

ATTACHMENT I

Figures and Tables



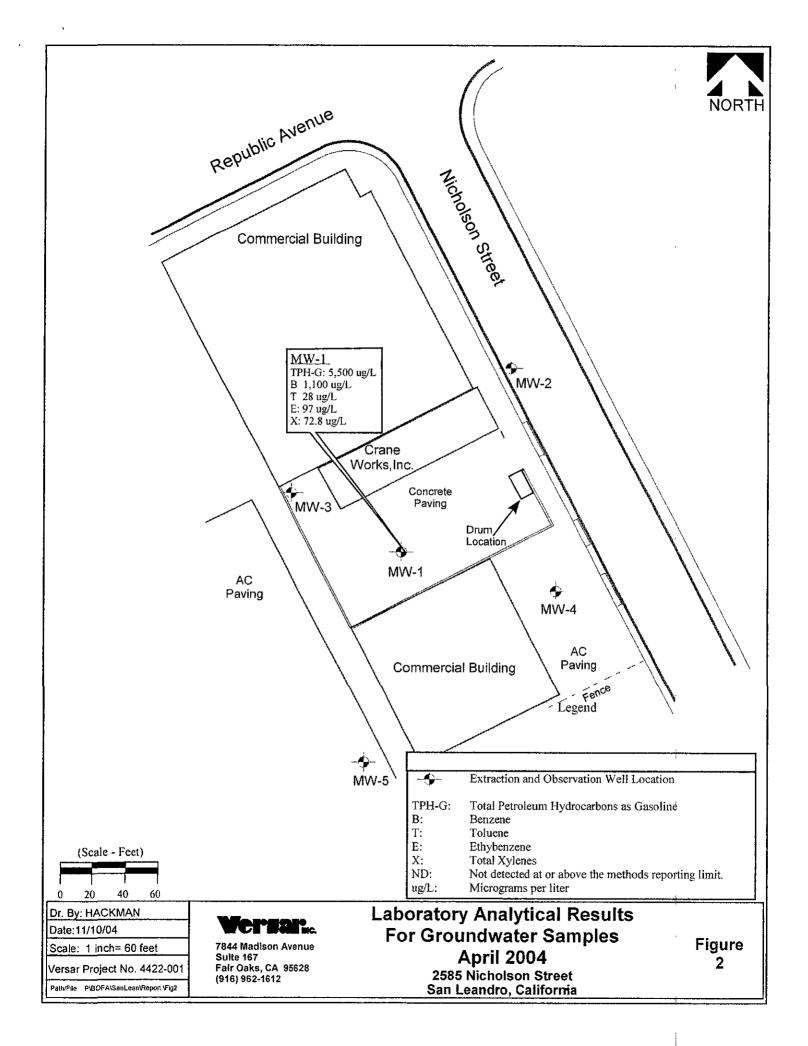


Table 1 Analytical Results for Groundwater Samples 2585 Nicholson Street San Leandro, California

						Chemicals of Co	icern		,	
Monitoring		TPH-G	G-H9T	трн-мо	ፕ ₽ዘ-K	TPH-SS	Benzene	Toluene	Ethylbenzene	Total Xylen
Well No.	Date	(µg/L)	(µg/L)	(μg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
I-WM	Jun-92	10,000	ND				110	81	62	280
	Nov-92 Apr-93	9,800 18,000	ND 560	ND	ND	370	23 42	14	22 50	96 190
	Jul-93	27,000	ND	ND	ND	ND	40	45	63	190
	Dec-91	7,800	3,800	ND	ND	ND	13	16	20	77
	Mar-94	280,000	620	ND	ND	3,300	970	880	620	1,700
	Jun-94	8,500	ND	' ND	ND	ND	23	13	8.5	19
	Sep-94	2,400	52	ND	ND	ND	5.3	2.6	2.5	6
	Dec-94 Apr-95	4,800 74,000	1300 3,700	ND ND	ND ND	1,000 570	32 320	32 350	16 350	50 940
	Sep-95	33,000	46,000	ND	ND	4,900	140	270	260	1,100
	May-99	8,100	ND	→ ND	-		1,400	31	82	360
	Jul-99	3,500	1,700				252	23	43	179
	Oc1-99	4,900		-		-	270	34	<5	378
	Jan-00 Apr-(X)	22,400	<500				1,300	402	483	2,490
	Jul-00	13,000 28,400	 <50	~ <500			1,130 1,470	226 190	335 299	1,410 967
	Oct-00	12,900	1	- 1		<1 000	1,000	197	353	1,400
	Jan-01	17,800	ì	- 1			957	146	353	1,069
	Apr-01	13,000	<50	-		-	1,200	170	450	1,300
	Oct-01	1,800					210	20	47	82
	Apr-02	3,8141		-		_	380	37	80	120
	Jan-03 Nov-03	14,000 13,000					1,200 1,900	130 92	250 210	310 198
	Apr-04	9,600	<u>-</u>	_		-	1,200	68	410	260
	Nov-04	5,5(K)					1,100	28	97	72 8
	Арг-99	ND	ND	ND			ND	ND	ND	ND
	Jul-99	<100	<100	-			<1 (3	<10	<1.0	<1.0
	Oct-99 Jan-00	<100 118	-] [<1.0 0.7	<10	<1.0	<10 <05
	Apr-00	<50					0.7	<0.5 <0.5	<0.5 <0.5	<0.5
	Jul-00	<400					0.8	<0.5	<05	<0.5
	Oct-00	<50					<0.5	<0.5	<0.5	<1.0
	Jan-01	104		-			<0.5	< 0.5	<0.5	<0.5
	Apr-01	160				}	<0.5	<0.5	<0.5	<0.5
	Oct-01	••		-		-	-		' }	
	Apr-02 Jan-03			-					_	
	Nov-03		=	_			Ξ.			
	Apr-04		_	-	_					
	Nov-04					 				
	Apr-99	NĐ	540	מא		-	ND	ND	ND	ND
	Jul-99	300 230	<100	-			<1.0 <1.0	<1.0	<1.0 <1.0	<10
	Oct-99 Jan-00	163	<50				6.8	<10 <05	<0.5	<10 <05
	Apr-00	90					0.0	<0.5	<0.5	<0.5
	Jul-00	<400					2.0	<0.5	<0.5	<0.5
	Oct-00	<50		\ -		}	<0.5	<0.5	<0.5	<10
	lo-act	62					<0.5	<0.5	<0.5	< 0.5
	Apr-01	62		-			<0.5	<0.5	<0.5	<0.5
	Oct-01 Apr-02	-		-			-		-	
	Jan-03				-		-			
	Nov-03			-	_	-	-		[
	Apr-04			-					- 1	
	Nov-04									
	Apr-99 Jul-99	110 120	ND <001	ND 		\	ND <10	ND <10	ND <1.0	ND
	Oct-99	<100					<10	<1.0	<1.0	<1,0 <10
	Jan-00	106	~-	- 1	_		0.9	<0.5	<0.5	< 0.5
	Арт-00	99	-				1.0	<0.5	<0.5	<0.5
	Jul-00			-						
	Oct-00 Jan-01	139				1	9.6	<0.5	<0.5	<10
	лап-ол Арг-01	85 130				- 1	<0.5 <0.5	<0.5 <0.5	<0.5 <0.5	<0.5 <0.5
	Oct-01			_						
Į	Apr-02		-	-			I		(
	Jan-07	-		-		l - -	-		-]	
	Nov-03	••		-		- :			- 1	
	Apr-04 Nov-04			i <u>-</u>		- 1	-		_	
	Apr-99	270	ND	ND ND	:		ND	ND	ND	ND
	Jul-99	570	<100	- 1			<10	<1.0	<10	<1.0
	Oct-99	540		-			<1,0	<10	<1.0	<10
	Jan-00	231				;	1.9	<0.5	<0.5	<0.5
	Apr-00	353		-			3.5	<0.5	<0,5	<0.5
	Jul-00	<4(X)		-		ا ا	<0.5	<0.5	<0.5	<0.5
	Oct-00 Jan-01	156 <50		-			1.0 <0.5	<0.5 <0.5	<0,5 <0.5	<10 <05
	Apr-01	200		[<0.5	<0.5	<0.5	<0.5
	Oct-01			_		-			- 1	
	Apr-02	-		-	••				-	
- 1	Jan-0.		-			:				
	Nov-03 Apr-04			-			-	**	-	
				}			i		!	

Notes and Abbrevielons.

TPH G = total petroleum hydrocarbons as gasoline.

TPH D = total petroleum hydrocarbons as gasoline.

TPH D = total petroleum hydrocarbons as bressen.

TPH-S = total petroleum hydrocarbons as stoderd solvent.

µpt = micrograms pet little sourcefent to peris per billion (ppb).

mg/L = midrograms pet little sourcefent to peris per million (ppm).

ND = not detected at or above the methods reporting limit.

= not unalysed.

ATTACHMENT II Monitoring Well Purge Table

	ersai.		PURG	E TABLE		PROJECT NO.	104422.4422.005					
SITE NAME:	Former BOFA -	San Leandro)	LOCATION:	2585 Nic	holson St, San Lea	indro, CA 94577					
WELL I.D.: M	1W-1			DATE PURG	ED: 11/4/	/2004						
PURGED/SAM	MPLED BY: Sc	ott Hackman		DATE SAMP	LED: 11/	4/2004						
MASTER LOC	CK NUMBER:	NA		TIME SAMPLED: 1050								
DEPTH TO BO	OTTOM (feet):	17.33'		DEPTH TO V	DEPTH TO WATER (feet): 5.60							
WATER COL	UMN HEIGHT	(feet); (1.7	3	CALCULATI	ED PURG	E (gallons): 5 z.	8					
CASING VOI	UME (gallons)	: 17.6		ACTUAL PU	RGE (gal	lons): 53						
DEVELOPME	NT	QUAR	TERLY X	BIANNUA	L	_ OTHER	<u></u>					
SAMPLE TYP	E: Groun	dwater <u>X</u>	Surface Wa	iter	Other							
Casing Volu (gallons per f	•	0.16)	(0.38) (0.6	56) (1.02)	(1	1.50) (2.60))					
			FIELD MEAS	SUREMENTS								
VOLUME (gal)	TIME (2400hr)	TEMP (degrees C		ONDUCTIVITY (mS/cm)	OXYG	EN (mV)						
<u> </u>	15.01	16.8	<u> (83</u>	1.00		-	<u>5, 7/</u>					
16	10 2 e	18.0	ં ૧૦	<u>0 981</u>	785	Broken	5, 75					
24	1030	18.3	695	0973	7.84		\$1.83					
32	10 34	18 6	7.02	0.642	7.50	REDO	¥ <u>5.96</u>					
<u> 40</u>	1059	(8.7	7.05	0.648	759		<i>6.</i> 33					
<u> </u>	1044	18.6	7.08	6 651	7.61		6.78					
53	1050	18:6	7.11	0.652	7:65		7.40					
<u></u>							**************************************					
	DATE SAMPLED: 11/4/2004 DATE SAMPLED: 11/4/2004 DATE SAMPLED: 1/0/50 DEPTH TO WATER (Feet):											
SAMPLE DE	PTH TO WATI	ER (feet):	7.40 A	ANALYSES:	TF	PH-g, BTEX						
80% RECHA	RGE: <u>*</u> YE	SNO 8	30% = 7.95	SAMPLE TURBI	DITY:	80						
ODOR: <u>Yes</u>	· STrong	SAI	MPLE BOTTLE/PR	RESERVATIVE:	3 HCL	VOAS						
PU	RGING EQ	UIPMEN'	Г	Sz	AMPLI	NG EQUIPME	ENT					
Centrifuga	ıl Pump _	Bailer (Te	eflon)	Centrifuga	l Pump	Bailer	(Teflon)					
Submersib	ole Pump _	Bailer (PV	C or disposable)	Submersib	le Pump	X Bailer	(PVC or disposable)					
Peristaltic	Pump _	Bailer (Sta	inless Steel)	Peristaltic	Pump	Bailer	(Stainless Steel)					
X Purge Pun	•	•			_		·					
	•				_							

ATTACHMENT III

Laboratory Analytical Data Reports



SunStar Laboratories, Inc.



10 November 2004

Scott Hackman Versar -- Fair Oaks 7844 Madison Ave #167 Fair Oaks, CA 95628

RE: BOFA-San Leandio

Enclosed are the results of analyses for samples received by the laboratory on 11/05/04 08:30. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Ben Beauchaine

Laboratory Supervisor

Chain of Custody Record

SunStar Laboratories, Inc. 3002 Dow Ave., Ste. 212 Tustin, CA 92780 714-505-4010

Client: Verger INC								Dat	e:	11		1-2	CC	4				Pag	e:	Of(
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			0		_	+	FB (BT) M	Σ	Σ	02/					aboratory ID			#
Sample ID	Date Sampled	Time	Sample Type	Container Type	8260	1260	3260	8270	8021 BTEX	8015M (gasoline)	8015M (diesel)	50	6010/7000 Title		1	Ì		apc	Commo	nts/Preservative	Total # of containers
MW-I	11-4-04	1050	water	HITCH VOAS	۳	1	1	1	X	×	ω_	ω.	0		_			0	Comme	113/1 Teservative	
Drum-1	11-4-04	100	water	4 HIL UCAS					×	×								02			
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Sample disposal Instructions I	Disposal @ \$2 00 e	each	Return	to client		Pic	kup _														

Fair Oaks CA, 95628

7844 Madison Ave #167

Project: BOFA-San Leandio

Project Number: 4422.005 Project Manager: Scott Hackman Reported: 11/10/04 09:06

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
MW-1	T401313-01	Water	11/04/04 10:50	11/05/04 08:30
Drum-1	T401313-02	Water	11/04/04 11:00	11/05/04 08:30

SunStar Laboratories, Inc.

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7844 Madison Ave #167 Fair Oaks CA, 95628 Project: BOFA-San Leandio

Project Number: 4422.005 Project Manager: Scott Hackman Reported: 11/10/04 09:06

MW-1 T401313-01 (Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		SunStar La	aboratori	es, Inc.					
Purgeable Petroleum Hydrocarbons l	by EPA 8015m								
C6-C12 (GRO)	5500	500	ug/l	10	4110508	11/05/04	11/08/04	EPA 8015m	
Surrogate: 4-Bromofluorobenzene		84.8 %	65-1	35	<i>n</i>	ıı	#	n ,	
Volatile Organic Compounds by EPA	Method 8021B								
Benzene	1100	1.0	ug/l	1	4110508	u	11/08/04	EPA 8021B	
Toluene	28	1.0	11	11	"	**	11	11	
Ethylbenzene	97	1.0	п	n	u	**	11	n	
m,p-Xylenc	63	2.0	II	H	u	u	**	II .	
o-Xylene	9.8	1.0	н	"	W	W	")1	
Surrogate: 4-Bromofluorobenzene		90.6 %	65-1	35	n	#	p	n	

SunStar Laboratories, Inc.

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7844 Madison Ave #167 Fair Oaks CA, 95628 Project: BOFA-San Leandio

Project Number: 4422.005 Project Manager: Scott Hackman Reported: 11/10/04 09:06

Drum-1 T401313-02 (Water)

			-						
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Note
		SunStar La	aboratori	es, Inc.					
Purgeable Petroleum Hydrocarbons	by EPA 8015m								
C6-C12 (GRO)	1100	50	ug/l	1	4110508	11/05/04	11/08/04	EPA 8015m	
Surrogate: 4-Bromofluorobenzene		84.8 %	65-1	35	-"	"	"	n	
Volatile Organic Compounds by EPA	Method 8021B								
Benzene	250	1.0	ug/l	1	4110508	Ħ	11/08/04	EPA 8021B	
Toluene	5.0	1.0	*1	u	0	l†	u	17	
Ethylbenzene	9.3	1.0	IP	11	#f	u	41	n	
m,p-Xylenc	4.8	2.0	**	0	n.	It .	U	**	
o-Xylene	2.4	1.0_	ır	n	11	"	ול	U U	
Surrogate: 4-Bromofluorobenzene		82.6 %	65-1	35	"	n	"	n	

SunStar Laboratories, Inc.

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Project: BOFA-San Leandio

7844 Madison Ave #167 Fair Oaks CA, 95628 Project Number: 4422.005 Project Manager: Scott Hackman Reported: 11/10/04 09:06

Purgeable Petroleum Hydrocarbons by EPA 8015m - Quality Control SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 4110508 - EPA 5030 GC										
Blank (4110508-BLK1)				Prepared:	11/05/04	Analyzed:	11/08/04			
C6-C12 (GRO)	ND	50	ug/I							
Surrogate: 4-Bromofluorobenzene	44.3		"	50.0		88.6	65-135	_	- 1	
LCS (4110508-BS1)		· · · · · · · · · · · · · · · · · · ·		Prepared:	11/05/04	Analyzed:	11/09/04			
C6-C12 (GRO)	5500	50	ug/l	5500		100	75-125			
Surrogate: 4-Bromofluorobenzene	45.2		"	50.0		90.4	65-135			
Matrix Spike (4110508-MS1)	So	urce: T40131	11-01	Prepared:	11/05/04	Analyzed:	11/09/04			
C6-C12 (GRO)	5070	50	ug/l	5500	ND	92.2	65-135			
Surrogate: 4-Bromofluorobenzene	46.7		11	50.0		93.4	65-135			
Matrix Spike Dup (4110508-MSD1)	So	urce: T40131	11-01	Prepared:	11/05/04	Analyzed:	11/09/04			
C6-C12 (GRO)	5210	50	ug/l	5500	ND	94.7	65-135	2.72	20	
Surrogate: 4-Bromofluorobenzene	46.5		п	50.0		93.0	65-135			

SunStar Laboratories, Inc.

7844 Madison Ave #167 Fair Oaks CA, 95628 Project: BOFA-San Leandio

Project Number: 4422.005
Project Manager: Scott Hackman

Reported: 11/10/04 09:06

Volatile Organic Compounds by EPA Method 8021B - Quality Control SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 4110508 - EPA 5030 GC	Result	Limit	Omto	Level	icoun	701CBC	Limits	KID	Limit	Notes
				 						·
Blank (4110508-BLK1)				Prepared:	11/05/04	Analyzed	: 11/08/04			
Benzene	ND	1.0	ug/l							
Toluene	ND	1.0	11							
Ethylbenzene	ND	1.0	u							
m,p-Xylene	ND	2.0	lt							
o-Xylene	ND	1.0	tı							
Surrogate: 4-Bromofluorobenzene	37.7		ii .	50.0		75.4	65-135			
LCS (4110508-BS1)				Prepared:	11/05/04	Analyzed	: 11/09/04			
Велгеле	83.1	1.0	ug/l	80.0		104	70-130			
Toluene	354	1.0	11	399		88.7	70-130			
Ethylbenzene	87.9	1.0	n	94.0		93.5	70-130			
n,p-Xylene	289	2.0	11	327		88.4	70-130			
o-Xylene	109	1.0	**	130		83.8	70-130			
Surrogate: 4-Bromofluorobenzene	38.6)ł	50.0		77.2	65-135			
Matrix Spike (4110508-MS1)	So	ource: T40131	11-01	Prepared:						
Benzene	81.1	1.0	ug/l	80.0	ND	101	70-130			
Foluene .	351	1.0	ц	399	ND	88.0	70-130			
Ethylbenzene	86.2	1.0	n	94.0	ND	91.7	70-130			
n,p-Xylene	293	2.0	11	327	ND	89.6	70-130			
o-Xylene	108	1.0	ч	130	ND	83.1	70-130			
Surrogate: 4-Bromofluorobenzene	39.1		"	50.0		78.2	65-135			
Matrix Spike Dup (4110508-MSD1)	So	urce: T40131	1-01	Prepared:	11/05/04	Analyzed	: 11/09/04			
Benzene	82.2	1.0	ug/l	80.0	ND	103	70-130	1.35	20	
Foluene -	358	1.0	11	399	ND	89.7	70-130	1.97	20	
Ethylbenzene	88.9	1.0	t)	94.0	ND	94.6	70-130	3.08	20	
n,p-Xylene	300	2.0	n	327	ND	91.7	70-130	2.36	20	
o-Xylene	110	1.0	η	130	ND	84.6	70-130	1.83	20	
Surrogate: 4-Bromofluorobenzene	38.5	·	"	50.0		77.0	65-135			
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SunStar Laboratories, Inc.

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Project: BOFA-San Leandio

7844 Madison Ave #167 Fair Oaks CA, 95628

Project Number: 4422.005
Project Manager: Scott Hackman

Reported: 11/10/04 09:06

Notes and Definitions

DET

Analyte DETECTED

ND

Analyte NOT DETECTED at or above the reporting limit

NR

Not Reported

dry

Sample results reported on a dry weight basis

RPD

Relative Percent Difference

SunStar Laboratories, Inc.

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ATTACHMENT IV Decontamination and Groundwater Monitoring Well Sampling Procedures

1.0 DECONTAMINATION PROCEDURES

The decontamination procedures for non-dedicated field equipment and well development/purging equipment are given below. These procedures are followed during all field activities.

- a. Non-dedicated well development, purging, and sampling equipment is carefully precleaned prior to each use, as follows:
 - a. Carefully brush off any loose foreign debris with a soft bristle brush.
 - b. Rinse the equipment thoroughly in clean water.
 - c. Wash the equipment in a non-phosphate detergent bath.
 - d. Rinse thoroughly in clean water.
 - e. Rinse thoroughly with deionized water.
 - f. Air dry in a dust-free environment.
 - g. Store in unused plastic bags or other suitable cover until use.
 - 2. Clean disposable gloves are worn by all field personnel when handling decontaminated equipment.

2.0 COLLECTION OF SAMPLES

2.1 Groundwater Sampling

Groundwater samples are collected for laboratory analysis using the procedures given below.

- 1. Open the well and measure the organic vapor concentration with a flame-ionization detector (FID) or photoionization detector (PID).
- 2. Measure the water levels (if any) in the well using a decontaminated measuring device. All measurements must be made to the nearest 0.01 foot, and measured relative to the top of the casing. Record the depth of the water in the field notebook.

- 3. Inspect the disposable bailer to ensure that the bottom valve assembly is working correctly.
- 4. Begin purging the well by inserting a bailer into the PVC monitoring well casing and carefully lower it into the well. Take care to avoid agitating and aerating the fluid column in the well.
- 5. Slowly withdraw the bailer and transfer the water samples to a sampling containers.
- 6. Measure the temperature, pH, conductivity, and turbidity. Record these and all subsequent measurements in the field notebook.
- 7. Continue purging the well (a minimum of three well volumes) until the temperature, pH, conductivity, and turbidity have stabilized, or the well is dry.
- 8. When the water has recovered to 80 percent of the original level, carefully lower a new disposable bailer into the well and recover groundwater samples.
- 9. Fill the appropriate sample containers by releasing water from the bailer via the bottom emptying device with a minimum of agitation. The most volatile parameters are collected first, proceeding to the least volatile parameters.
- 10. Place the purge water in a DOT-approved 55-gallon drums.

3.0 ANALYSIS OF SAMPLES

Samples are submitted to a California state-certified laboratory for analysis.

4.0 SAMPLE HANDLING

4.1 Sample Containers, Preservation, and Holding Times

All samples are collected, placed in containers, preserved, and analyzed within the time constraints with applicable local, provincial, and federal procedures. All sample containers are precleaned in accordance with prescribed EPA methods. A custody seal is placed around all sample container lids to prevent leaks and unauthorized tampering with individual samples following collection and prior to the time of analysis.

4.2 Sample Tracking and Management

All samples are tracked using a standard chain-of-custody form. The chain of custody record includes the following information:

- 1. Sample number
- 2. Signature of collector
- 3. Date and time of collection
- 4. Sample collection location
- 5. Sample type
- 6. Signature of persons involved in the chain-of-possession
- 7. Inclusive dates of possession
- 8. Analytical parameters
- 9. Pertinent field observations

The custody record is completed using waterproof ink. Corrections are made by drawing a line through, initialing the error, and then entering the correct information.

Custody of the samples begins at the time of sample collection and are maintained by the sampling team supervisor until samples are relinquished for shipment to the laboratory, or until samples are hand-delivered to the designated laboratory sample custodian. Partial sample sets being accumulated for hand-delivery to the laboratory are stored in coolers with chain-of-custody records sealed in plastic bags and placed in the cooler with the sample sets.