

RECEIVED

By dehloptoxic at 1:16 pm, Sep 28, 2006

September 28, 2006

Mr. Barney Chan
Alameda County
Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Ste. 250
Alameda, California 94502-6577

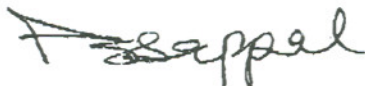
RE: Soil Vapor Extraction System Start-up Report
Alaska Gas
6211 San Pablo Avenue
Oakland, California

Dear Mr. Chan:

Attached for your review and comment is the September 21, 2006 "*Results of Startup Testing of Soil Vapor Extraction System (SVES), Alaska Gas, 6211 San Pablo Avenue, Oakland, California, Alameda County*" report prepared by HerSchy Environmental, Inc upon my behalf, for the above-referenced site.

As the legally authorized representative of the above-referenced project, I have reviewed the attached report and declare, under penalty of perjury, that the information and/or recommendations contained in the attached document are true and correct to the best of my knowledge.

Sincerely,



Mr. Pritpaul Sappal



erSchy Environmental, Inc.

September 21, 2006
Project A51-01

Ms. Irma Salinas
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Re: Results of Startup Testing of Soil Vapor Extraction System (SVES), Alaska Gas, 6211 San Pablo Avenue, Oakland, California, Alameda County

Dear Ms. Salinas:

HerSchy Environmental, Inc. is pleased to present this report summarizing the results of the start-up testing performed on September 11, 2006 of the thermal oxidizer at the above-referenced site. The site is located at 6211 San Pablo Avenue in Oakland, California. The thermal oxidizer began operating on August 31, with written notification sent to your office. This system operates under the Authority to Construct (ATC) permit number 10975. In compliance of the permit, the system was monitored for influent and effluent volatile organic compounds (VOCs) and air flow rates within 10 days of start-up. The following summarizes the data obtained.

The unit has maintained the proper combustion temperature of greater than 1,400 degrees Fahrenheit and a flow rate below the 300 standard cubic feet per minute (scfm) as required by permit. Continuously recording devices, as required by permit, record the combustion temperature and process flow rates. Monitoring will be performed on a monthly basis to confirm compliance, and will include monitoring using a portable organic vapor analyzer (OVA) to monitor influent and effluent concentrations. Periodically, air samples will be collected and analyzed to verify field measurements.

Table 1 summarizes the analytical results from the influent and effluent air samples collected on September 11, 2006. Air samples were collected in tedlar bags by exerting vacuum outside of the tedlar bags, causing each bag to fill with process air. Air velocity was measured at 76.5 cubic feet per minute (cfm) on September 11 by inserting a hotwire style velocity measurement device into the influent air flow. Air monitoring data sheets are provided in Appendix A.

Samples were analyzed by a certified laboratory for gasoline-range petroleum hydrocarbons (TPH-g) by EPA Method 8015M, for benzene, toluene, ethylbenzene, and xylenes (BTEX), and for methyl tertiary butyl ether (MTBE) using EPA Method 8020. Certified analytical reports are presented in Appendix B.

Table 1
Laboratory Analytical Results for Influent and Effluent Air
 Alaska Gas, September 11, 2006

Sample	Date	TPHg	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE
Influent	9/11/2006	3,300	54	110	19	86	230
Effluent	9/11/2006	ND	ND	ND	ND	ND	ND

Results in parts per million by volume (ppmV)

Table 2 summarizes the calculations for destruction efficiency and the effluent discharge over a 24-hour period for gasoline-range total petroleum hydrocarbons (TPH-g) and benzene.

Table 2: Destruction and Discharge Calculations							
Hours of Operation	Influent (ppmV)	Effluent (ppmV)	Air Flow (cfm)	Destruction Efficiency (%)	Effluent Release (lbs/day)	VOCs Removed (lbs/day)	Total VOCs Removed (lbs)
TPH-g							
24	3,300	0-0.14	76.5	99-100%	0.00	92.86	92.86
Benzene							
24	54	0-0.16	76.5	99.70%	0.00	1.52	1.52

Parts per million by volume (ppmv) VOCs as gasoline-range TPH can be converted to micrograms per liter (ug/L) by multiplying by 4.1 based on the mole weight of TPH. Benzene can similarly be converted to ug/L by multiplying ppmV of benzene by 3.2. One liter is equal to 0.03531 cubic feet. The above destruction efficiency calculations is based on weight. To calculate pounds per day (lbs/day) of VOCs, the formula is as follows:

$$(\text{ug/L})(\text{gm}/1,000,000)(\text{kg}/1,000 \text{ gm})(2.2 \text{ lbs/kg}) = \text{lbs/L VOCs}$$

Converting lbs/L to lbs/day:

$$(\text{lbs/L})(1/.03531 \text{ cf})(\text{cfm})(1440 \text{ min/day}) = \text{lbs/day VOCs}$$

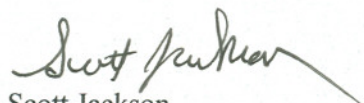
where cf = cubic feet

cfm = cubic feet per minute

Given that about 93 pounds of product (TPH-g) are removed in 24 hours and 6.18 pounds of VOCs equals approximately one gallon of product, approximately 15 gallons of product are removed in a 24-hour period. During the same period, concentrations of less than 0.14 ppmV of TPH-g and 0.16 ppmV of benzene were discharged, based on non-detect levels returned at the respective detection limit. Destruction efficiency is very near 100%, with discharge of both constituents at 0.00 pounds per day.

HerSchy Environmental, Inc. requests that a Permit to Operate (PTO) be issued for this unit. HerSchy Environmental, Inc. will maintain the system in compliance with the current ATC, and the PTO when issued. If you have any questions, or require additional information, please contact this office at (559) 641-7320.

With best regards,
HerSchy Environmental, Inc.



Scott Jackson
Senior Project Manager
Professional Geologist #7948



cc: Ms. Susan M. Torrence
Mr. Pritpaul Sappal

APPENDIX A

FIELD AIR DATA SHEETS



AIR MONITORING DATA SHEET

PROJECT: ALASKA GAS DATE: 9-11-06

PROJECT NUMBER: A51-01 TIME: 1200

HOUR METER, PREVIOUS: _____ hours

HOUR METER, CURRENT: 126 hours

HOURS OPERATING: _____ hours

PERCENTAGE OPERATING: _____ %

CONTROLLERS
TEMP = 1535°
DILUTION = 1423°
HIGH LIMIT = 1424°

EFFLUENT CONCENTRATION: 2.8 ppm

MIDPOINT CONCENTRATION: — ppm

INFLUENT CONCENTRATION: 697 ppm

DESTRUCTION EFFICIENCY: _____ %

WELLS OPEN: _____

EQUIPMENT USED: PID, TSI, VAC BOX

AIR FLOW: Combined Influent 76.5 cfm

Effluent (Chart) _____ cfm

Individual Flow _____

SAMPLER: JOE NELSON

COMMENTS:

TOOK BAG SAMPLES FOR START-UP INSPECTION

APPENDIX B

CERTIFIED ANALYTICAL RESULTS

CASTLE ANALYTICAL LABORATORY

Environmental Testing Services
Certificate No. 2480

2333 Shuttle Drive, Atwater, CA 95301

(209) 384-2930
(209) 384-1507

HerSchy Environmental
P.O. Box 229
Bass Lake, CA 93604
Attn: Scott Jackson

Client Project ID: Alaska Gas - Oakland
Reference Number: 9442
Sample Description: Air
Sample Prep/Analysis Method: 5030/8015M, 8020
Lab Number: 9442-1V
Sample ID: Effluent

Sampled: 09-11-06
Received: 09-11-06
Analyzed: 09-12-06
Reported: 09-14-06

TOTAL PETROLEUM HYDROCARBONS - GASOLINE RANGE WITH BTEX DISTINCTION

ANALYTE	PQL* (ug/L)	PQL* (ppmv)	AMOUNT (ug/L)	AMOUNT (ppmv)
MTBE	0.50	0.14	ND	ND
BENZENE	0.50	0.16	ND	ND
TOLUENE	0.50	0.13	ND	ND
ETHYL BENZENE	0.50	0.11	ND	ND
TOTAL XYLENES	0.50	0.11	ND	ND
GASOLINE RANGE HYDROCARBONS	50	12	ND	ND
Dilution Factor:	1			

Instrument ID:

VAR-GC1

*PQL - Practical Quantitation Limit

Analytes reported as ND were not detected or below the Practical Quantitation Limit

APPROVED BY:


James C. Phillippe / Laboratory Director or
Clari J. Cone / Laboratory Manager

CASTLE ANALYTICAL LABORATORY

Environmental Testing Services
Certificate No. 2480

2333 Shuttle Drive, Atwater, CA 95301

(209) 384-2930
(209) 384-1507


HerSchy Environmental P.O. Box 229 Bass Lake, CA 93804 Attn. Scott Jackson	Client Project ID: Alaska Gas - Oakland Reference Number: 9442 Sample Description: Air Sample Prep/Analysis Method: 5030/8015M, 8020 Lab Number: 9442-2V Sample ID: Influent	Sampled: 09-11-06 Received: 09-11-06 Analyzed: 09-12-06 Reported: 09-14-06
---	---	---

TOTAL PETROLEUM HYDROCARBONS - GASOLINE RANGE WITH BTEX DISTINCTION

ANALYTE	PQL* (ug/L)	PQL* (ppmv)	AMOUNT (ug/L)	AMOUNT (ppmv)
MTBE	25	6.9	820	230
BENZENE	25	7.8	170	54
TOLUENE	25	6.6	420	110
ETHYL BENZENE	25	5.7	84	19
TOTAL XYLENES	25	5.7	380	86
GASOLINE RANGE HYDROCARBONS	2500	610	13000	3300
Dilution Factor:	50			

Instrument ID: VAR-GC1

*PQL - Practical Quantitation Limit
Analytes reported as ND were not detected or below the Practical Quantitation Limit

APPROVED BY: 
James C. Phillips / Laboratory Director or
Clari J. Qone / Laboratory Manager