DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5635
TTY (800) 735-2929
www.dot.ca.gov

Flex your power!
Be energy efficient!

February 29, 2012

Ms. Barbara Jakub
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Subject: Soil Vapor Testing Report Submittal- 6th Street & Castro Street, Oakland, CA

Reference: ACEH Fuel Leak Case No. RO250, Facility Global ID # T0600102155

Dear Ms. Jakub:

On behalf of California Department of Transportation (Caltrans), I am pleased to submit the following Soil Vapor Testing Report for the above referenced site. The report has been prepared by Northgate Environmental Management, Inc.

Certification

I certify under penalty of law that these documents are prepared for Caltrans by the consultants in accordance with the system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing the violations.

If you have any questions, or comments, please contact me at (510) 286-5635.

Sincerely,

CHARLES D. SMITH, P.E.
Senior Transportation Engineer
Office of Environmental Engineering

February 27, 2012

Mr. Gopal Nair
Environmental Services Division
Public Works Agency
City of Oakland
250 Frank H. Ogawa Plaza, 4th Floor
Oakland, California 94612

RE: Soil Vapor Testing Report
6th and Castro Street Caltrans Property
Oakland, California

Dear Mr. Nair:

This report presents the results of a soil vapor testing program performed by Northgate Environmental Management, Inc. (Northgate) at the 6th and Castro Street Caltrans Property in Oakland, California (the Site). The purpose of the investigation was to evaluate the potential presence of total petroleum hydrocarbons as gasoline (TPH-g) and benzene, toluene, ethylbenzene, and xylenes (BTEX) in soil vapor beneath the Site and to provide a preliminary evaluation of whether these contaminants could potentially impact air quality inside any future buildings at the Site. A Site Location Map is shown as Figure 1 and a Site Plan is shown as Figure 2.

BACKGROUND

Records indicate that three underground storage tanks (USTs) were removed from the southwest portion of the Site in 1971, where a former gasoline service station occupied the corner of Brush and 6th Streets between 1956 and 1967. Other historical Site uses included a dairy creamer and a commercial warehouse where underground storage tanks were known or reported. The California Department of Transportation (Caltrans) purchased the property between 1969 and 1971 and in 1973 demolished all on-Site buildings. The parcel has remained vacant since that time. Aerial photographs indicate that the Site has occasionally been used for truck and trailer parking and as a staging area for the 1985 construction of the 980 Freeway.

Seven subsurface investigations and ten groundwater monitoring events have been performed at the subject Site. The earliest investigations were conducted to assess potential environmental liabilities related to valuation and sale of the property. The investigations identified fuel contaminants in soil and grab groundwater samples, in addition to lead in shallow soil samples and one grab groundwater sample. In 1998 Alameda County Environmental Health Services was assigned as the

local oversight agency responsible for overseeing investigation and clean-up. Investigations performed after 1998 focused on determining the extent of contamination, and these investigations included the installation of three on-Site monitoring wells in 1999 and four on- and off-Site monitoring wells in 2008. Groundwater monitoring occurred on a quarterly basis between fourth quarter of 1999 and first quarter of 2001, and then again between the third quarter of 2008 and second quarter of 2009. The subsurface contamination identified during these investigations appears to be gasoline fuel, associated with underground fuel tanks, removed in January 1971 from the former gasoline service station located in the southwestern portion of the Site. The highest concentrations of contaminants detected in groundwater between 1999 and 2009 are TPH-g at 65,000 micrograms per liter (µg/L), benzene at 880 µg/L, toluene at 5,100 µg/L, ethylbenzene at 3,100 µg/L, total xylenes at 18,400 µg/L, total petroleum hydrocarbons as diesel (TPH-d) at 6,500 µg/L, 1,2-dichloroethane at 160 µg/L, and other fuel-related volatile organic compounds (VOCs) up to 3,500 µg/L. These constituents were measured in well MW-2, located on-Site about 85 feet east of the corner of Brush and 6th Streets. Other on-Site wells displayed at least three orders of magnitude lower concentrations of these contaminants. Groundwater sample analyses did not contain methyl tert-butyl ether (MTBE) or other fuel oxygenates. The groundwater gradient beneath the Site appears to be generally to the south, with historical monitoring data also indicating a southwest or southeast groundwater flow direction.

INVESTIGATION METHODS

Northgate performed a soil vapor survey at the Site on October 25, 2011. The survey consisted of collecting soil vapor samples at 11 locations in the southwest portion of the subject Site, at the approximate locations shown on Figure 2. Soil vapor samples were collected and analyzed by TEG-Northern California of Rancho Cordova, California under the direction of Northgate. Samples were collected from a depth of five feet below the ground surface (bgs), in accordance with California Department of Toxic Substances Control (DTSC) guidelines, with the exception of sample locations SV-5, SV-6, SV-9, and SV11. Location SV-5 was sampled at 4.5 feet bgs, while sample locations SV-6, SV-9, and SV-11 were all sampled at 4.0 feet bgs due to the presence of tight or low permeability soil conditions. The soil vapor sampling probes were constructed of 1-inch outer diameter chrome-moly steel, equipped with a steel drop-off tip. An inert 1/8-inch diameter Nylaflow® tube ran down the center of the probe to sample ports at the base of the tip. The probe was driven into the subsurface with an electric rotary hammer. Once inserted to the desired depth, the probe was retracted slightly to open the tip and expose the vapor sampling ports. This design prevents clogging of the sampling ports and cross-contamination from soils during probe insertion.

A surface seal consisting of hydrated bentonite was then installed around the soil vapor probe, and leak tests were performed using a tracer gas (1,1-difluoroethane) to evaluate ambient air intrusion. Each probe was allowed to stabilize for approximately 30 minutes before purging and sampling. Soil vapor samples were withdrawn from the Nylaflow® tubing at a flow rate of less than 200 milliliters (ml) per minute using a small, calibrated-syringe connected to the tubing via an on-off

valve. A purge volume test was initially conducted at vapor sample location SV-9 to determine the optimal purge volume for sampling. Vapor samples were collected for chemical analysis at SV-9 after purging the sampling apparatus of 1, 3, and 7 purge-volumes of air. As shown in Table 1, the highest VOC concentrations at SV-9 were measured in the sample collected after removing one purge volume from the probe. All subsequent samples were collected after one purge volume was withdrawn and discarded to flush the sample tubing in order to fill it with in-situ soil vapor. The next 200 ml of soil vapor were drawn from each probe location into the syringe, which was then plugged and immediately transferred to TEG's on-Site mobile laboratory for analysis. A duplicate soil vapor sample was collected at SV-5. After sampling, the steel probes were removed, and all vapor probe boreholes were backfilled with cement grout.

Soil vapor sampling results were compared to the California Human Health Screening Levels (CHHSLs), established by the DTSC, for evaluating potential impacts to indoor air quality in residential and commercial land use scenarios. Where CHHSLs are not established, they were substituted by Environmental Screening Levels (ESLs) for potential vapor intrusion concerns in residential and commercial land use scenarios, as established by the California Regional Water Quality Control Board (RWQCB).

INVESTIGATION RESULTS

Soil vapor samples were analyzed for TPH-g, BTEX, naphthalene, and trichloroethene using EPA Method 8260B in TEG's on-Site mobile laboratory. Soil vapor samples were additionally analyzed for methane, oxygen, and carbon dioxide by GC/TCD in the on-Site mobile laboratory. TEG's mobile laboratory is certified by the California Department of Health Services for the analyses performed.

Soil vapor sample analytical results are presented in Table 1, and the laboratory analytical report is attached to this letter. As shown in Table 1, ethylbenzene, xylenes, naphthalene, and trichloroethene were not measured above the laboratory method reporting limits (MRLs) in any of the soil vapor samples analyzed. TPH-g was reported in soil vapor samples collected from three locations: the primary and duplicate samples from SV-5, at concentrations of 13,000 and 11,000 micrograms per cubic meter (µg/m^3), respectively; from SV-6 at a concentration of 10,000 µg/m^3; and from SV-11, at a concentration of 15, 000 µg/m^3. Three of the four reported concentrations of TPH-g exceed the ESL of 10,000 µg/m^3 for potential vapor intrusion in residential land use, but do not exceed the ESL for commercial land use of 29,000 µg/m^3.

Benzene was measured in every soil vapor sample analyzed, at concentrations ranging from 32 to 320 µg/m^3. Nine of the measured concentrations exceed the residential CHHSL of 36.2 µg/m^3. Four reported concentrations (140 µg/m^3 from SV-4; 280 and 160 µg/m^3 from SV-5; 210 µg/m^3 from SV-10; and 320 µg/m^3 from SV-11) exceed the commercial land use CHHSL for benzene of 122 µg/m^3. Toluene was reported in three of the soil vapor samples: 270 µg/m^3 at SV-5 (duplicate

sample contained < 200 µg/m^3), 220 µg/m^3 at SV-10, and 250 µg/m^3 at SV-11. None of the measured concentrations of toluene exceed the residential land use CHHSL of 135,000 µg/m^3 or the commercial land use CHHSL of 378,000 µg/m^3.

As shown on Table 1, methane was not detected above the laboratory MRL in any sample analyzed. Oxygen was reported at concentrations ranging from 13 to 19 percent by volume (%). Carbon dioxide was reported at concentrations ranging from 1 to 5.5 %. Although these findings do not suggest inadequate or limited biotic conditions in soil at the Site, conclusions regarding the potential for biodegradation cannot be made, based on findings from the current investigation. Additional soil vapor sampling would be required to assess the trends in oxygen and carbon dioxide concentrations in soil vapor at the Site.

CONCLUSIONS

In summary, the soil vapor sampling performed during this investigation indicates that TPH-g is present in soil vapor at concentrations that exceed the ESL for residential land use. Benzene is present in soil vapor at concentrations that locally exceed the CHHSLs for residential and commercial land use scenarios. As such, soil and groundwater contamination beneath the Site could potentially impact indoor air quality in future on-Site structures. Additional evaluation of the extent of elevated soil vapor concentrations is recommended.

CLOSING

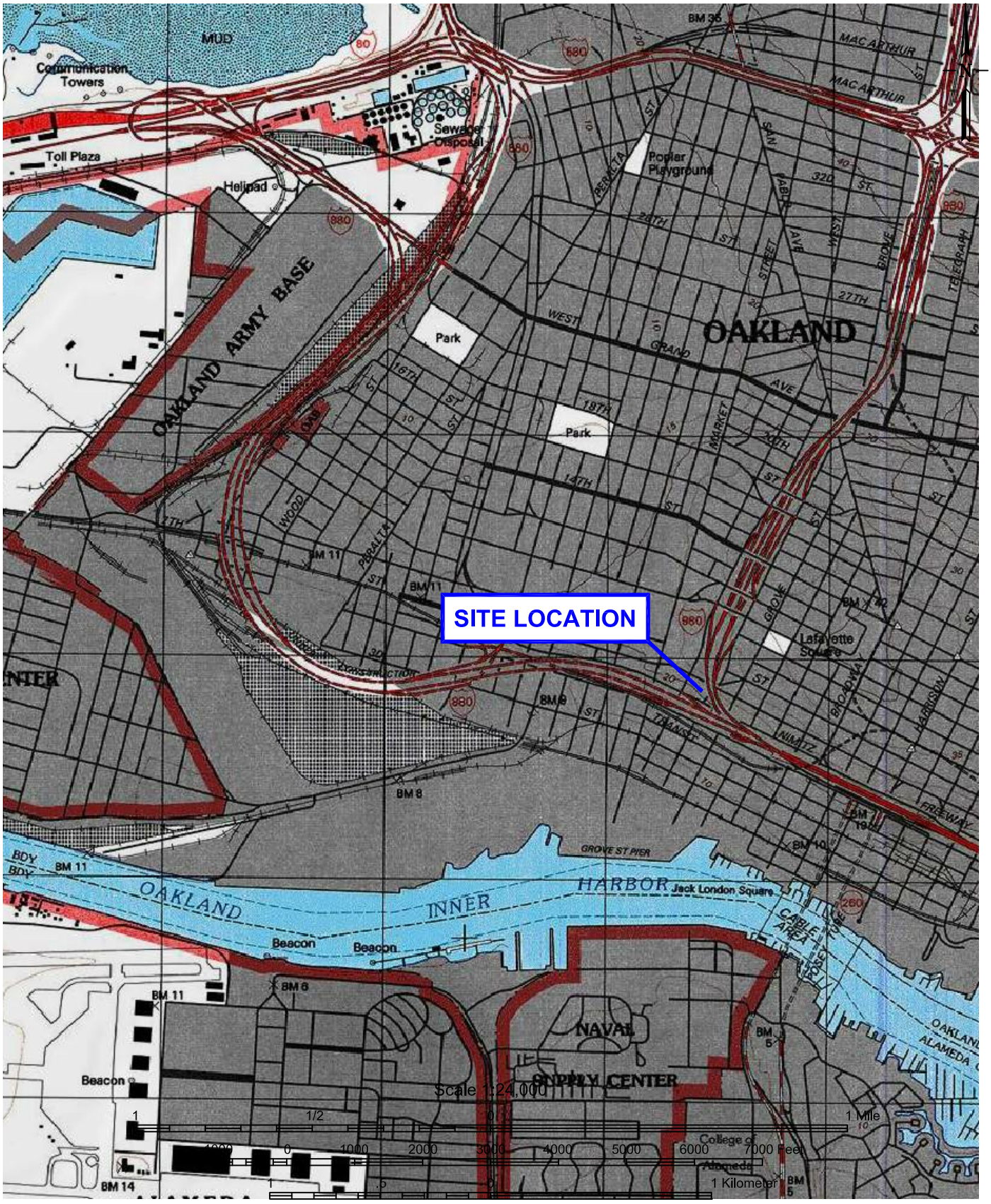
We appreciate the opportunity to work with you on this project. Should you have any questions or require additional information, please do not hesitate to call.

Sincerely,
Northgate Environmental Management, Inc.

Dennis Laduzinsky, C.E.G., R.E.A.
Principal

Anya Starovoytov
Staff Environmental Scientist

Enclosures: Figure 1: Site Location Map
Figure 2: Soil Gas Sample Locations
Table 1: Soil Vapor Sample Analytical Results
Attachment 1: Laboratory Report



Source: National Geographic USGS TOPO! 2000

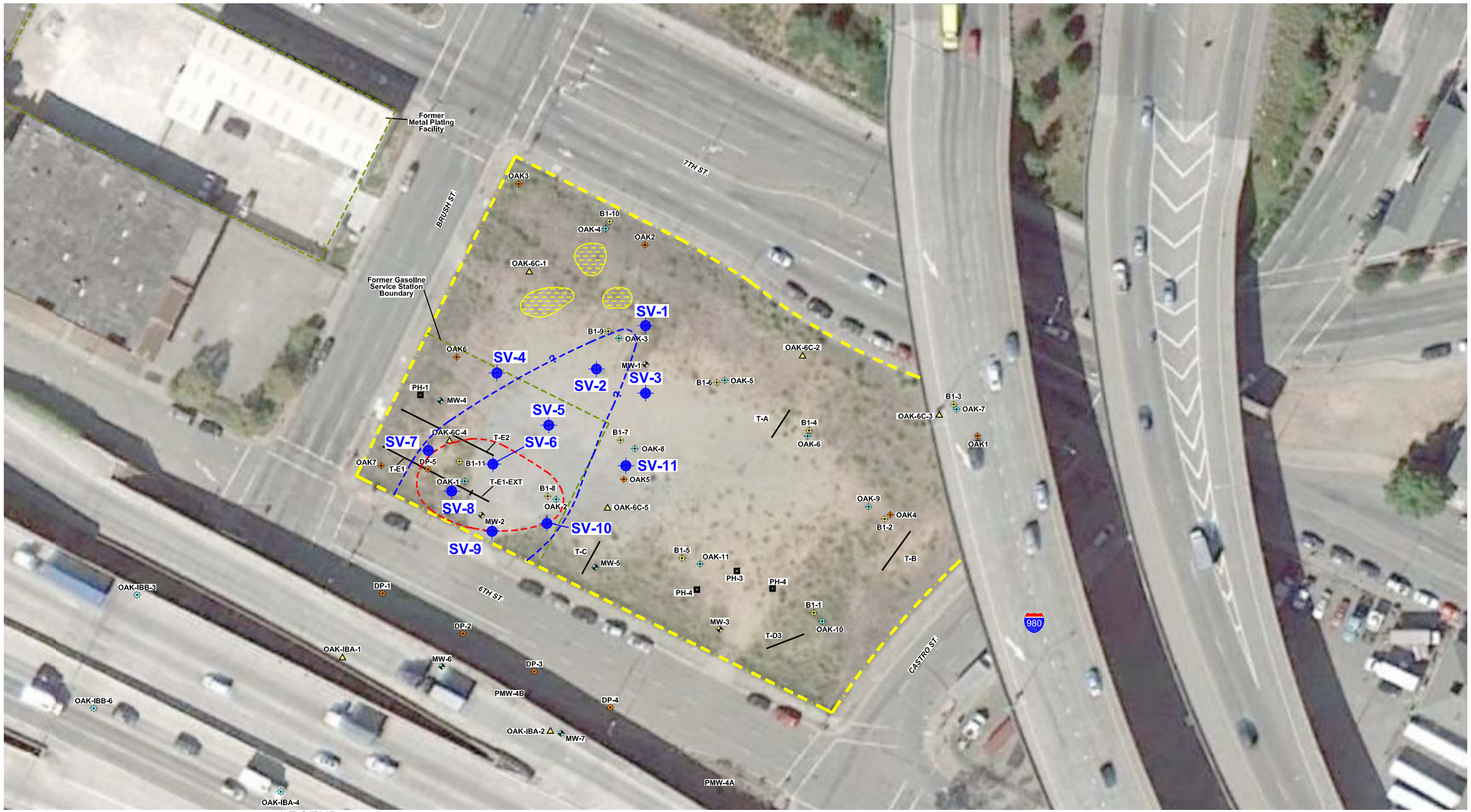
FIGURE 1
Site Location Map

Soil Vapor Testing Report
6th and Castro Street
Oakland, California

northgate environmental management, inc.

Project No. 1204.19

G:\Projects\Temp\1204 City of Oakland\1204.19 6th and Castro\1204.19 Figures\Phase II\Figure 1.dwg Layout: 8.5x11-P User: oleg Jan 11, 2012 - 3:16pm



LEGEND:

- Property boundary
- OAK3 — Approximate boring location; Geocon, 1995
- B1-10 — Approximate boring location; IT Corporation, 1996
- OAK-1 — Approximate boring location; PSI, 1999
- MW-3 — Approximate ground water monitoring well location; PSI, 1999
- OAK-IBB-3 — Soil boring and grab groundwater location; IRIS Environmental
- OAK-6C-1 — Soil boring location; IRIS Environmental
- MW-4 — Approximate groundwater monitoring well location; Kleinfelder, 2009
- DP-5 — Approximate boring location; Kleinfelder, 2009
- PH-1 — Pothole excavated with backhoe; Kleinfelder, 2009
- T-E1 — Approximate trench location; Kleinfelder, 2009
- Fill mounds
- Estimated extent of soil contamination on-site
- Estimated extent of groundwater contamination on-site
- Soil gas sampling location

N

0 25 50

Scale (Feet)

FIGURE 2
Soil Gas Sample Locations

Soil Vapor Testing Report
6th and Castro Street
Oakland, California

northgate environmental management, inc.

Project No. 1204.19

G:\Projects\Temp\1204 City of Oakland\1204.19 6th and Castro\1204.19 Figures\Phase III\Figure 2.dwg Layout: F2 User: dlea Jan 11, 2012 - 3:15pm

TABLE 1
Soil Vapor Sample Analytical Results

Analyte	Units	Sample ID														Regulatory Standards	
		SV-9	SV-9	SV-9	SV-1	SV-2	SV-3	SV-4	SV-5	SV-5 (dup)	SV-6	SV-7	SV-8	SV-10	SV-11	CHHSL	
	PV	1	3	7	1	1	1	1	1	1	1	1	1	1	1	Residential	Commercial
TPH-Gasoline	µg/m^3	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	**13,000**	**11,000**	**10,000**	< 10,000	< 10,000	< 10,000	**15,000**	10,000**	29,000**
Benzene	µg/m^3	**87**	**61**	**35**	**32**	**47**	**76**	**140**	**280**	**160**	**73**	**32**	**41**	**210**	**320**	36.2	122
Toluene	µg/m^3	< 200	< 200	< 200	< 200	< 200	< 200	< 200	**270**	< 200	< 200	< 200	< 200	**220**	**250**	135,000	378,000
Ethylbenzene	µg/m^3	<100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	170,000**	170,000**
Xylenes	µg/m^3	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	< 300	31,500	87,900
Naphthalene	µg/m^3	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	< 70	31.9	106
Trichloroethene	µg/m^3	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	528	1,770
Methane	ppmV	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	< 500	ne	ne
Oxygen	%	**7.9** [a]	**17**	**17**	**19**	**16**	**16**	**17**	**13**	**14**	**17**	**18**	**17**	**16**	**15**	ne	ne
Carbon Dioxide	%	**1**	**2.4**	**2.5**	**1.9**	**4.4**	**4.9**	**2**	**5.5**	**5.1**	**2.8**	**3.1**	**2.2**	**3.3**	**3.1**	ne	ne
1,1-Difluoroethane*	µg/m^3	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	< 10,000	ne	ne
Other VOCs	µg/m^3	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	na	na

NOTES

µg/m^3: Micrograms per cubic meter

ppmV: parts per million by volume

%: oxygen and carbon dioxide measured in percent by volume

PV: Purge volume

TPH: Total petroleum hydrocarbons

<: Not detected at or above the indicated laboratory method reporting limit

ND: Not detected above the laboratory method reporting limit; limits vary by compound

ne: Not established

na: Not applicable

*: Leak detection compound

CHHSL: California Human Health Screening Level (DTSC, 2005 Table 2)

**ESL: Environmental Screening Level (RWQCB, 2008 Table E-2)

a: Laboratory analyst reports that the oxygen measurement from the first purge volume of SV-9 is erroneous given that the two remaining samples collected indicate an oxygen level of 17%

4 November 2011

Mr. Dennis Laduzinsky
Northgate Environmental Management, Inc.
300 Frank H. Ogawa Plaza, Suite 510
Oakland, CA 95612

SUBJECT: DATA REPORT - Northgate Environmental Management Project # 1204.19
Sixth Street & Castro Street, Oakland, California

TEG Project # 11025E

Mr. Laduzinsky:

Please find enclosed a data report for the samples analyzed from the above referenced project for Northgate Environmental Management. The samples were analyzed on site in TEG's mobile laboratory. TEG conducted a total of 42 analyses on 14 soil vapor samples.

-- 14 analyses on soil vapors for aromatic volatile hydrocarbons (BTEX), naphthalene, trichloroethene, and total petroleum hydrocarbons-gasoline by EPA method 8260B.

-- 14 analyses on soil vapors for methane by GC/TCD.

-- 14 analyses on soil vapors for oxygen and carbon dioxide by GC/TCD.

The results of the analyses are summarized in the enclosed tables. Applicable detection limits and calibration data are included in the tables.

1,1 difluoroethane was used as a leak check compound during the soil vapor sampling. No 1,1 difluoroethane was detected in any of the vapor samples reported at or above the DTSC recommended leak check compound reporting limit of 10 µg/L of vapor.

TEG appreciates the opportunity to have provided analytical services to Northgate Environmental Management on this project. If you have any further questions relating to these data or report, please do not hesitate to contact us.

Sincerely,

Mark Jerpbak
Director, TEG-Northern California

Northgate Environmental Management, Inc.
Project # 1204.19
Sixth Street & Castro Street
Oakland, California

TEG Project #11025E

Analyses of SOIL VAPOR in micrograms per cubic meter of Vapor for
BTEX, Naphthalene, Trichloroethene, & TPH-gasoline (EPA method 8260B)

Methane in ppmV, and Oxygen and Carbon Dioxide in percent by Volume

SAMPLE NUMBER:		Probe Blank	SV-1	SV-2	SV-3	SV-4
SAMPLE DEPTH (feet):			5.0	5.0	5.0	5.0
PURGE VOLUME:			1	1	1	1
COLLECTION DATE:		10/25/11	10/25/11	10/25/11	10/25/11	10/25/11
COLLECTION TIME:		09:39	14:02	13:42	14:43	14:22
DILUTION FACTOR (VOCs):		1	1	1	1	1
	RL					
Benzene	30	nd	32	47	76	140
Toluene	200	nd	nd	nd	nd	nd
Ethylbenzene	100	nd	nd	nd	nd	nd
m,p-Xylene	200	nd	nd	nd	nd	nd
o-Xylene	100	nd	nd	nd	nd	nd
Naphthalene	70	nd	nd	nd	nd	nd
Trichloroethene	100	nd	nd	nd	nd	nd
TPH (gasoline range)	10000	nd	nd	nd	nd	nd
Methane	500	nd	nd	nd	nd	nd
Oxygen	5.0	21	19	16	16	17
Carbon Dioxide	1.0	nd	1.9	4.4	4.9	2.0
1,1-Difluoroethane (leak check)	10000	nd	nd	nd	nd	nd
Surrogate Recovery (DBFM)		105%	107%	108%	104%	105%
Surrogate Recovery (1,4-BFB)		116%	123%	116%	117%	116%

'RL' Indicates reporting limit at a dilution factor of 1
'nd' Indicates not detected at listed reporting limits

Analyses performed in TEG-Northern California's lab
Analyses performed by: Ms. Stephanie Seymour

11350 Monier Park Place, Rancho Cordova, CA 95742 Phone: (916) 853-8010 Fax: (916) 853-8020

Northgate Environmental Management, Inc.
Project # 1204.19
Sixth Street & Castro Street
Oakland, California

TEG Project #11025E

Analyses of SOIL VAPOR in micrograms per cubic meter of Vapor for
BTEX, Naphthalene, Trichloroethene, & TPH-gasoline (EPA method 8260B)

Methane in ppmV, and Oxygen and Carbon Dioxide in percent by Volume

SAMPLE NUMBER:		SV-5	SV-5 dup	SV-6	SV-7	SV-8
SAMPLE DEPTH (feet):		4.5	4.5	4.0	5.0	5.0
PURGE VOLUME:		1	1	1	1	1
COLLECTION DATE:		10/25/11	10/25/11	10/25/11	10/25/11	10/25/11
COLLECTION TIME:		12:47	12:47	12:03	11:40	11:18
DILUTION FACTOR (VOCs):		1	1	1	1	1
	RL					
Benzene	30	280	160	73	32	41
Toluene	200	270	nd	nd	nd	nd
Ethylbenzene	100	nd	nd	nd	nd	nd
m,p-Xylene	200	nd	nd	nd	nd	nd
o-Xylene	100	nd	nd	nd	nd	nd
Naphthalene	70	nd	nd	nd	nd	nd
Trichloroethene	100	nd	nd	nd	nd	nd
TPH (gasoline range)	10000	13000	11000	10000	nd	nd
Methane	500	nd	nd	nd	nd	nd
Oxygen	5.0	13	14	17	18	17
Carbon Dioxide	1.0	5.5	5.1	2.8	3.1	2.2
1,1-Difluoroethane (leak check)	10000	nd	nd	nd	nd	nd
Surrogate Recovery (DBFM)		102%	107%	105%	105%	107%
Surrogate Recovery (1,4-BFB)		118%	113%	117%	118%	120%

'RL' Indicates reporting limit at a dilution factor of 1
'nd' Indicates not detected at listed reporting limits

Analyses performed in TEG-Northern California's lab
Analyses performed by: Ms. Stephanie Seymour

11350 Monier Park Place, Rancho Cordova, CA 95742 Phone: (916) 853-8010 Fax: (916) 853-8020

Northgate Environmental Management, Inc.
Project # 1204.19
Sixth Street & Castro Street
Oakland, California

TEG Project #11025E

Analyses of SOIL VAPOR in micrograms per cubic meter of Vapor for
BTEX, Naphthalene, Trichloroethene, & TPH-gasoline (EPA method 8260B)

Methane in ppmV, and Oxygen and Carbon Dioxide in percent by Volume

SAMPLE NUMBER:		SV-9	SV-9	SV-9	SV-10	SV-11
SAMPLE DEPTH (feet):		4.0	4.0	4.0	5.0	4.0
PURGE VOLUME:		1	3	7	1	1
COLLECTION DATE:		10/25/11	10/25/11	10/25/11	10/25/11	10/25/11
COLLECTION TIME:		10:11	10:31	10:52	15:03	15:36
DILUTION FACTOR (VOCs):		1	1	1	1	1
	RL					
Benzene	30	87	61	35	210	320
Toluene	200	nd	nd	nd	220	250
Ethylbenzene	100	nd	nd	nd	nd	nd
m,p-Xylene	200	nd	nd	nd	nd	nd
o-Xylene	100	nd	nd	nd	nd	nd
Naphthalene	70	nd	nd	nd	nd	nd
Trichloroethene	100	nd	nd	nd	nd	nd
TPH (gasoline range)	10000	nd	nd	nd	nd	15000
Methane	500	nd	nd	nd	nd	nd
Oxygen	5.0	7.9	17	17	16	15
Carbon Dioxide	1.0	1.0	2.4	2.5	3.3	3.1
1,1-Difluoroethane (leak check)	10000	nd	nd	nd	nd	nd
Surrogate Recovery (DBFM)		107%	103%	106%	103%	103%
Surrogate Recovery (1,4-BFB)		123%	116%	117%	113%	119%

'RL' Indicates reporting limit at a dilution factor of 1
'nd' Indicates not detected at listed reporting limits

Analyses performed in TEG-Northern California's lab
Analyses performed by: Ms. Stephanie Seymour

11350 Monier Park Place, Rancho Cordova, CA 95742 Phone: (916) 853-8010 Fax: (916) 853-8020

Northgate Environmental Management, Inc.
Project # 1204.19
Sixth Street & Castro Street
Oakland, California

TEG Project #11025E

CALIBRATION STANDARDS - Initial Calibration / LCS

Instrument: Agilent 5975B MSD

	INITIAL CALIBRATION		LCS	
COMPOUND	RF	%RSD	RF	%DIFF
Benzene	1.347	17.1%	1.294	3.9%
Toluene	0.832	17.2%	0.834	0.2%
Ethylbenzene	0.550	13.9%	0.520	5.5%
m,p-Xylene	0.691	15.2%	0.635	8.1%
o-Xylene	0.655	12.7%	0.610	6.9%
Naphthalene*	0.982	21.9%	0.872	11.2%
Trichloroethene	0.345	13.6%	0.321	7.0%
TPH-Gasoline	1.267	18.4%	1.215	4.1%
Acceptable Limits		20.0%		15.0%

' * ' Indicates RSD not to exceed 30% & LCS not to exceed 25%

11350 Monier Park Place, Rancho Cordova, CA 95742 Phone: (916) 853-8010 Fax: (916) 853-8020