

ORO LOMA SANITARY DISTRICT

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7:48 am, Apr 10, 2007

Alameda County Environmental Health BOARD OF DIRECTORS Frank V. Sidari, President Howard W. Kerr, Vice President Laython N. Landis, Secretary Herbert G. Crowle, Director Roland J. Dias, Director

> GENERAL MANAGER Michael C. Cameron

Mr. Steven Plunkett Alameda County Health Care Services Environmental Protection Division 1131 Harbor Bay Parkway, Suite 250 Alameda, CA, 94502-6577

Transmittal of Initial Response: Request for Interim Remedial Action Plan Fuel Leak Case RO0000288: 2600 Grant Avenue, San Lorenzo, CA

Dear Mr. Plunkett:

March 30, 2007

We attach herewith our initial response to the requests in your letter dated February 21, 2007, which has been prepared by our engineering consultants, The Sutton Group. The attached letter presents details about the proposed remedial program, supported by test data obtained in the field investigation program performed in 2004. It also responds to questions you raised in your letter.

The consultants reviewed several alternative procedures for remediating the area of the former 500-gallon gasoline tank. They concluded that the most effective program will be a combination of bulk excavation of soil in the area of the former tank, and collection of gasoline tainted groundwater for treatment in the District's POTW. The District has reviewed the capability of it's POTW to handle the recovered, gasoline-tainted ground water. Based on Sutton's initial estimate of water recovery at the rate of 5 to 20 gallons/minute, the tainted water, containing gasoline at historical concentrations as high as 150 parts per million, including benzene at up to 23 ppm, this will still not have a measurable effect on the 20 million gallons/day (14,000 gpm) treatment plant's recently-restored throughput.

We ask that you provide us feedback on the plan outlined in the attached letter, and then provide us a time extension of 45 days in which to prepare a formal work plan.

In regard to Geotracker EDF submittals, our consultant has surveyed the well locations, and the field and laboratory data have been loaded onto the SWRCB website in the appropriate formats. We understand, however, that the data can only be uploaded onto the publicly accessible area of the website by SWRCB staff, and that there is a backlog.

As the authorized representative of the Oro Loma Sanitary District I declare, under penalty of perjury, that the information and recommendations contained in this and the attached document are true and correct to the best of my knowledge.

Please continue to directly contact our consultant, John Sutton, PE, in regard to technical aspects of this closure process. However, do not hesitate to contact me or my administrative assistant Ken Ross with regard to any administrative issues.

Respectfully submitted

Michael C. Cortez

District Engineer

THE SUTTON GROUP

3708 Mount Diablo Blvd. Suite 215, Lafayette, California 94549 Phone 925 284-4208 FAX 925 871-3617 E-mail suttongeo@sbcglobal.net

March 31, 2007

Mr. Steven Plunkett Alameda County Health Care Services Environmental Protection Division 1131 Harbor Bay Parkway, Suite 250 Alameda, CA, 94502-6577

Subject: Response to Request for Interim Corrective Action Work Plan Site of Former Gasoline Tank at Oro Loma Sanitary District, 2600 Grant Avenue, San Lorenzo, CA Fuel Leak Case RO0000288

Dear Mr. Plunkett:

We present our response to the Alameda County Environmental Health Services Agency's (Agency) letter to the Oro Loma Sanitary District (District) dated February 21, 2007. Herein we provide a brief discussion of the remedial alternatives evaluated, details of the proposed remedial program, and the status of the Geotracker data uploading. This letter has been reviewed by the District and is presented under its March 30th 2007 cover letter.

We present an efficient and cost effective clean-up procedure for the gasoline tank site. Presuming that the agency will concur with our recommended interim corrective action procedure, the next step will be to implement the clean-up on a staged basis. The first stage would be to submit a formal interim corrective action work plan for Agency review/approval. Following plan approval, we will then prepare construction plans and specifications, presuming that District will require public bidding of the clean-up work. When the bids are received, they would be forwarded to the State Tank Fund , so pre-approval of the clean-up reimbursement can be obtained. The contractor would then perform the cleanup work under our oversight. The final phase will be post-construction monitoring to verify and quantify the success of the remediation.

Recent History

Subsequent to Agency's letter dated January 2, 2004 and authorization of this firm's work plan dated April 5, 2004, a boring program was conducted in spring 2004 to delineate the vertical limits of contamination, as well as to collect geochemical data about the site for remedial design. The borings confirmed that no significant soil contamination by gasoline constituents extends deeper than 9 feet below the ground surface. Further, as had been indicated from past explorations, and confirmed by the three borings drilled in 2004, the majority of contamination passes through the site via relatively few and thin sand layers (½ to 3-foot thick) that are sandwiched between fat clay (Younger Bay Mud) layers, and in "smear zones" above and below the sands. Figure 1 shows the site location and the regional geology. As noted in that figure, the site is approximately a quarter mile from residential development.

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SOILS, FOUNDATIONS, DRAINAGE, PAVING, EARTH RETAINING SYSTEMS, SLOPE INSTABILITY: GEOTECHNICAL, GEO-CIVIL AND GEO-ENVIRONMENTAL ENGINEERING

The asphalt paved site is also well buffered from public access. It was proposed that remediation would be by in-situ bioremediation and so the testing was directed toward quantifying key parameters. Using an interface probe, the investigations confirmed the absence of free product. A double-walled push sampler was used for collecting continuous soil cores. Slotted plastic pipe was temporarily installed in the holes to facilitate ground water sampling.

Field tests on grab ground water samples in 2004 quantified dissolved oxygen, salinity (conductivity), temperature, pH and Oxidation Reduction Potential (ORP), summarized in the appendix Field geochemical data and laboratory testing also quantified the presence of dissolved metals (iron and manganese), chemical oxygen demand (COD) and biological oxygen demand (BOD), as well as gasoline/BTEX/MTBE in soil and groundwater. Laboratory test results on soil samples are included on the borings. Groundwater test results are provided in the Appendix.

Figure 2 shows the locations of the 2004 soil borings and as well as those of all previous borings and test pits, and the five existing groundwater monitoring wells. Appendix B--1, 2 and 3 are the logs of 2004 borings EP-16, -17 and -18. Appendix B4 and 5 are logs of the two geotechnical borings GB-1 and -2 drilled near the engineering building in 1995. Boring locations are shown on Figures 2 and 3.

From previous data and the three 2004 borings, it was concluded that the most significant zone of ground contamination lies within an approximate 180 square foot area, extending southwest from the former tank site. Historical gasoline constituent levels in soil have shown benzene to be as high as 23 parts per million (ppm). Beyond the approximate 180 square foot area, benzene contamination in soil was typically less than 5 ppm.

Remedial Alternatives Evaluation

We reviewed several alternative procedures for remediating the area of the former 500gallon gasoline tank, including (a) no-action, (b) in-situ bio-remediation, (c) bulk soil removal, (d) ground water pump-and-treat, and (e) combinations of these processes.

The "no action" alternative had been tested over a period of several years' groundwater sampling with little, if any, natural bio-degradation observed over the period. While the effectiveness of the gravel-filled sewer trench beneath the Grant Avenue sidewalk as an interceptor trench was demonstrated by the continuous absence of any gasoline-related contamination in monitoring wells MW-1 and -2 since 1999, the occurrence of low, but increasing concentrations in MW-3 over recent time suggests that groundwater contamination may be migrating.

Following discussions with Regenesis, the bioremediation-with-ORC vendor, the presence of the groundwater contaminants within thin sand zones separated by relatively impervious clay layers beneath the site would limit the effectiveness of the process. This in combination with the relatively high benzene concentrations would further limit the effectiveness of the bioremediation-with-ORC process. Even with several reagent re-injections the effectiveness of the process would be limited.

OLSD: Interim Cor Action Itr to ACEH 20070331final .doc

Due to the confinement of groundwater within thin sand zones separated by relatively impervious clay layers beneath the site, it was believed that the site area could not be effectively cleanedup by well array "pump-and-treat" on a finite time schedule. While surging could be used to stimulate flushing of the smear zones, the slow well recovery rate would result in a relatively long remediation period.

It is believed that the most effective program would be a combination of source area excavation of soil in the 180 square foot vicinity of the former tank, supplemented by collection and treatment of gasoline contaminated groundwater from recovery trenches Figure 3 is a schematic layout of this plan. The recovered groundwater would be treated in the District's Publicly Owned Treatment Works (POTW). The District has confirmed (see cover letter to this document) that its POTW has the capability to effectively treat the recovered, contaminated ground water at minimal direct cost to the project. Based on our initial estimate of groundwater recovery at the rate of 5 to 20 gallons/minute (gpm), which we believe to be conservatively high, the groundwater containing gasoline at historical concentrations as high as 150,000 ppb, including benzene at up to 23,000 ppb, would still not have a measurable effect on the treatment plant's 20 million gallons/day (14,000 gpm) throughput.

Geotracker Database

At this time, sampling data sheets, analytical laboratory results and recent investigative data have been uploaded to both the SWRCB's Geotracker database and the Agency's FTP site. This effort included a new well survey performed to the Geotracker system's precise specifications. Subsequent sampling data will also be uploaded to the two sites.

Certification and Closure

This letter has been prepared by the undersigned, a currently California-licensed Civil Engineer. Please do not hesitate to contact me directly with any questions you may have or with additional requests for information regarding technical aspects of this project.

Respectfully submitted

THE SUTTON GROUP



John R. Sutton, PE Principal Engineer Attachments:

Figure 1:	Regional Geol	logic Map
Figure 2:	Site plan with in soil concent	boring and test pit locations and historic benzene rations
Figure 3:	Site plan show recovery trenct	ring proposed excavation area and groundwater hes
Appendix A:	Laboratory tes	st reports for groundwater, 2004 (8 pages).
Appendix B:	Pages 1, 2, 3:	Logs of 2004 borings EP-16, -17, -18.
	Pages 4, 5:	Logs of geotechnical borings GB-12.



3022.12 geol map fig1.doc





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L	afayette, ((025) 28	CA, 94549 1-1208							
	(723) 20							S	Sheet 1 of 1
Project	No.	3022.11				Drilling Company	Precision	Sampling, Inc.	
Date D	rilled	5/21/200)4			Driller	Marco	Lic. No. C	57: 636387
Client		Oro Lom	a Sanitary D	District		Drill Rig Model	Envirocor	e SD-1	
Site ad	dress	2600 Gra	ant Avenue	1580		Drilling Method /Dia.	Pusn- dua 1% in ID :	al wall continuous core x 3.0 ft barrel	e 2½ in OD x
Boring	Location	Engrg./N	/Intc. Bldg P	kg. lot, l	East side.	Ground Elevation		Datum:	msl
Logged	d By		Joh	n R. Su	itton, GE No. 812	Water depth 5.3'			
DEPTH FEET	SAMPLE #, TYPE	RECOVERY (INCHES)	SYMBOL	USCS CLASS		DESCRIPT	TION		DEPTH FEET
0	1	<u>3</u> 36		GP	Asphalt on aggrega Poor recovery	te base, olive color, dry, t	no odor		0
4	/			Pt	PEAT, brown/black (Indistinct boundary	, fibrous, with strong petro	oleum odor		
-	2	25							
5	/	30		5P	@ 4.6 : SAND, fine	, green, moist, strong peti	roleum odor		5
7									·
	3	14			Sheen on water sur	face at 7.3 ft depth			\bigtriangledown
10		36 16-1		ОН	@7.7': ORGANIC (Gas=97ppb, B=2.9	CLAY, very silty, stiff, blac ppb; T=2.2; EB=4.0; X=1.	k. 5, MTBE=NE	0<0.5	10
10	4	34		СН	CLAY, stiff, highly p	blastic, wet, gray			10
		36 16-2			@10.5-10.8ft: Gas= CLAY, medium stiff	=4.4ppb, B=1.2ppb; T=0.0 , green/black, strong sulfi	07; EB=0.30; ide odor	X=0.59, MTBE=ND<0	.5
13		16-3			@ 12.6-12.8 ft: Gas	s=ND, B=ND; T=0.006; E	B=ND; X=0.0	19, MTBE=ND<0.5	
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20		<u> </u>							20
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1011	Check									
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n OD x	Push- dual wall continuous core 21/2 in	hod /Dia.	Drilling Met			nt Avenue	600 Gra	2	ddres	Site
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•		or	g gasoline od	CLAY, green, stron	СН		<u>3</u>	2 <u>1</u>	4	
5	um odor	, strong petrole	green, moist	@ 4.6': SAND, fine	SP		6	3	$\exists / [$	5
									7	
\bigtriangledown		depth	face at 7.3 ft	Sheen on water su			<u>1</u> 6 -	3 <u>2</u> 3		
10	=1.2; X=4.8, MTBE=ND<0.170	к. bb; T=0.13; EB	ppb, B=2.8pt	@7.8 CLAY, very 8 @8.6-8.9ft: Gas=2	СН		17-1	\triangleleft		10
	odor	strong sulfide	, green/black	CLAY, medium stif			<u>3</u> 6	4 <u>3</u> 3		
	3=0.019; X=0.010, MTBE=ND<0.5	31; T=0.032; E ft	s=1.5, B=0.03	@ 12.4-12.7 ft:: Ga			17-2	\leq	3	
	=0.80, MTBE=ND<0.5	29; EB=0.17; 2	B=1.2; T=0.0	@14.3 ft: Gas=3.5,			17-3			
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Logged E	By	BECOVEDY	Jol	hn R. Sut	tton, GE No. 812	Water depth		4.3				DEDTU
FEET	#, TYPE	(INCHES)	1 1	CLASS			DESCRIPTIC	// 11				FEET
0 1	1	<u>24</u> 36		GP	Asphalt on aggrega	te base, tan, It.∣	Brown and	blue, very	v moist, no o	odor		0
	2	<u>20</u>		СН	CLAY, medium stiff	, very moist, hig	h plastic, bl	ack				▼
5	/	36		SP-SM	@ 5 0': SAND fine	slightly silty ar	av and area	n moist				5
				CL-OL	@5.5': Organic CL	AY, stiff, sulfide	odor, black	areen				
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		50		СН	CLAY, medium stiff	, very silty, very	moist, gray	-green				
13	\sim	18-2			@ 12.6-12.8 ft: Gas	=ND<1.0, B=NL	J<.005; T=I	ND; EB=N	ID; X=ND, I	MIBE=NI	D<0.05	
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Date Drilled	7/12/1995	Drilling Company	Soils Exploration Services
Client	Oro Loma Sanitary District	Driller	Morris
Site Name	1,000 gal Gas. Tank	Rig Model	CME-55
City/Town	San Lorenzo, CA	Drilling Method	Hollow Stemmed Auger
		Sampling Method	Calif, Shelby tube
Logged By	J.R.S.	Surface Elevation	9.5 ±
		Borehole Diameter	9"

Depth (ft)	Graphic Symbol	USCS Symbol	Soil Description	5	Sample Ty BlowCoun N-V	pe/ ts/ /alue	Remarks
	2	÷	ASPHALT, 2" thick	1	1		
20	0.0	GP/GM	FILL:Base Course Gravel, well graded, dry, brown	·	<u> </u>		+
	O_{a}	CL/CH	CLAY stiff, gravelly, moist, Bay Mud/Fill interface	C	2,3,4	7	1
		r		· ·····			
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	┼┼┼┼┤			+			
	╋╋		BAY MUD, soft to medium stiff	S			Push 7-9.
	╋╋			·			2"/24 recovery
	+++++++++++++++++++++++++++++++++++++++	CL ·	BAY MUD, soft, very moist, gray	·			
10		CH/CL	BAY MUD, soft, very moist, gray		<u> </u>		ST,10-12',.
	++++	a y y sprand final contains and war	DD=89:5, w=50%, , -200=95%,	-			24/24 recov
••••••	+			S			
•••••••		<u></u>		·}			
	MAU			·			
15		MH/CH	BAY MUD, soft, SILT/CLAY, mod.plasticity,very	С	1,1,1	2	
			moist, olive green, strong organic.decomp.odor				
			DD=78, w=42%, LL=45, PI=21		••••••		
20			easy push then sand at 21.5'				ST 20-22 lost
		СН	CLAY, high plastic, w/#8 sized cem, shell nodules	S			in hole
	<u> </u>		lt. green/gray DD=103.9,w=20.9,LL=53.p=PI=31				due to sand
	1111110	SC	SAND Lens, Clayey, green				layer @ 21.5
25	(Third	CL	CLAY, very stiff, sandy, brown	С	3,7,9	16	
	1111	<					
		SC	@ 26.3 becomes SAND, clayey, brown			Ī	
			⊖DD=111.6 pcf, w=18.7 %, <i>-</i> #200=81%				
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30						Ĩ	

THE SUTTON GROUP 51 Shuey Drive Moraga, CA 94556 Project No. 3022.6

Boring No. SB-1

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THE SUTTON GROUP 51 Shuey Drive Moraga, CA 94556

Project No. 3022.6

Boring No. SB-1

Renumbered 2GB-12 Page 5 of 7

(510) 631-1688 FAX (510) 631-1371 sg\olsd/logSB1-2.doc, 8/15/95

Date Drilled	7/12/1995	Drilling Company	Soils Exploration Services
Client	Oro Loma Sanitary District	Driller	Morris
Site Name	1,000 gal Gas. Tank	Rig Model	CME-55
City/Town	San Lorenzo, CA	Drilling Method	Hollow Stemmed Auger
		Sampling Method	Calif, Shelby tube
Logged By	J.R.S.	Surface Elevation	응 나 별
		Borehole Diameter	9"

Depth (ft)	Graphic Symbol	USCS Symbol	Soil Description		Sample Ty BlowCour N	/pe/ hts/ -Value	Remarks
	a. 0.	•	ASPHALT, 2" thick over roadbase: Gravelly SAND,				
	0		dry, blue green, odorless			•	
	0 0					•	
		1	MIXED FILL including Bay Mud and peat with	1	•••••••••••••••••••••••••••••••••••••••	******	
5			sand and gravel			•	
			6' Black fine sand with strong odor of gasoline	С	2,3,3	6	
				-	•	+	
		CH/CL	CLAY, moderate to high plasticity, organic, soft to	S			ST 7.0-9.0,
			medium stiff, gray, green, blackLL=48, PI=23	-		+	100% recovery
10		×		•	-	<u> </u>	
			CLAY, gray-green as above	С			advanced
							under rod wt.
45		<u></u>					
15	┼┼┼┼┼╽		LL = 20 DL=15 #000 co d	S	L		ST 15.0-16.6'
			LL-39, P1=15, -#200=99.4				(20") 100% recov.
20				С	5,9,10	19	
2		CL/CH	CLAY with cementation, shell (gravel size),				
	11111		nodules, stiff, wet, light gray	<u>.</u>			
•••••••	111111	,	DD=105 pcf, w=23.4%	ł	·		
	111111						
25	111111		1				
	****	CL.	@25.2 CLAY, silty, very stiff, moist, olive brown	С	4,7,12	19	
	11/1//		DD=106pcf, w=23.0%	·			
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THE SUTTON GROUP

51 Shuey Drive Moraga, CA 94556

Project No. 3022.6

Boring No. SB-2 Renumbered GB-2 Spage¹ 6°bf²7

(510) 631-1688 FAX (510) 631-1371 sg\olsd/logSB2-1.doc 8/15/95

Depth (ft)	Graphic Smbol	USCS Symbol	Soil Description	Sa	Imple Typ BlowCou N	oe/ nts/ -Value	Remarks
	11/1/1	CL	CLAY, as above, less stiff, moist, olive brown	C	3.5.6	111	
	111111		DD=101.7. w=23.8%	····			
	1.1.1.1.1.1.1.						··
~ -	11/1/1						5 and
35	11111		CLAY, stiff, slightly sandy, moist, olive brown				
	(11/1/1)		DD=104.8 pcf, w=22.0%	C	4,8,9	17	
	<u>Leccion</u>	(1	
			TERMINATED at 36.5 feet	···	1	-	
	1		shaft grouted w/ neat cement slurry, topped off.				
40		••••••			+		+
			Catcher used with California samples		+		1
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THE SUTTON GROUP 51 Shuey Drive Moraga, CA 94556

(510) 631-1688 FAX (510) 631-1371 sg\olsd/logSB2-2.doc 8/15/95 Project No. 3022.6

Boring No. SB-2

Renumbered GB-2 Page 7 of 7

APPENDIX A

Geochemistry field results Groundwater, OLSD

	MW-2	MW-4	MW-5	EP-16	EP-17	EP-18
Date	4/27/04	4/27/04	4/27/04	5/21/04	5/21/04	5/21/04
Water depth, ft	5.2	4.6	4.0	4.8	4.5	4.3
Boring TD, ft				13.0	16.0	13.0
TEMP, °C	19.9	20.4	21.9	21.1	21.3	21.1
Specific Conduct.,	7653	6882	19904	5381	6506	5507
μ S/cm ²						
DO, %	4.9	6.4	15.4	35.5	66.7	65.8
DO, mg/l	0.43	0.56	1.27	2.90	4.37	4.7
pH	7.21	7.02	7.08	6.66	6.71	6.85
ORP	-192	-170	-144	-75	-73.2	-85

CHAIN OF CUSTODY FORM

Page _____ of ____

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				Report To:	\mathcal{B}_{ℓ}	In	SU	TON			-	2				
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							9	420	S	F	2	*				
	\wedge	omal				4	189	IL page	Y.	X	X,	ų				
			Matrix	1/	Pr	eser	vative		S	け	STE	2				
Laboratory		Sampling	e	#					H	E.	7	20	10			
Number	Sample ID.	Date	Soi /as	Containers	힡	SX Z	lΰ	Field Notes	14	81	5	<u>3</u> (22			
Humber		Time	22	oomaniero							H	3 /	1			
+	MWD1-042704	4/1/4/650		1-1Lamber			X		Х							
	*	¥ 1650	X	3,40me V	X		X			X					<u> </u>	
>	MW2-042704	1555		3-40-24	X	2-	X				-	×	-			
<u><u>k</u></u>		1558	X	500 ml poly	ļ		X						시			
0	V	1855		250 mlpty		<u>x</u>					+	<u>ہ</u> م	++	-	<u> </u>	
	1004-042704	1 1935		1 L poly			X		-			<u> </u>	1.1		├ ─- ├ ─	+
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ليت ا		140	X	9=0 ml poly		x	X					X				
	31/	1455	X	3.40 ml	X		K				X					
	1/	(F	ELINQUISHED BY:			F	REC	EIVEI	BY:		
	P			-		K	Zah	477/11/1820 has		a 1	0.	1	TØ	41	16:	TEPA
	/				, CP	WF		RDATE/TIME	1	\mathcal{M}	R	Ve	<i>V</i>	DA	TE/TIM	IE
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								HEAD SPACE ABSENT	RS Y	TAR				DA.	TEA	ppendi
L_,	more	vi pala)					DECREORINATED IN LAB	at at a				÷			age 2
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McCampbell Analytical, Inc.

110 Second Avenue South, #D7 CA 04552 5560

MW5

APPENDIX A CHAIN-OF-CUSTODY RECORD

Page 1 of 1

(925) 7	98-1620						W	orkOr	der: 04	404404		Clie	ntID: 7	ſSG					
Report to:								Bill	to						Requ	ested	TAT:	5 day	/S
John Sutton TEL: 925-284-4208							Accou	nts Pay	/able										
The Sutton GroupFAX:925-284-41893708 Mt. Diablo Blvd, Ste. 215ProjectNo:#3022.11; Oro Loma San. DisLafayette, CA 94549PO:				Dist.	The Sutton Group3708 Mt. Diablo Blvd, Ste. 215Lafayette, CA 94549						Date Received: 04/27/04 Date Printed: 05/05/04)4)4						
									Re	queste	ed Test	s (See	legend	below)					
Sample ID	ClientSampID	Matrix	Collection Date	Hold	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
0404404-001	MWD1	Water	04/27/04 4:50:00				A		В								<u> </u>	1	Т
0404404-002	MW2	Water	04/27/04 3:55:00		С	В		Α						1			1		T
0404404-003	MW4	Water	04/27/04 2:35:00		С	В	D	А											

В

С

D

А

Test Legend:

0404404-004

1	BOD_W	
6		
11		

2	CODF_W
7	
12	

04/27/04 2:55:00

Water

3	G-MBTEX_W
8	
13	

4	METALS_DISS	
9		
14		

5	TPH(D)_W
10	
15	

Prepared by: Melissa Valles

Comments:

McC	ampbell An	alytical, Inc.	APPEI	NDIX 1A2nd A Telep Website: www	Avenue South, #D7, Pacheco, CA 94553-556 hone : 925-798-1620 Fax : 925-798-1622 v.mccampbell.com E-mail: main@mccampbel) Il.com
The Sutton Grou	р	Client Project ID): #3022.11;	Oro Loma	Date Sampled: 04/27/04	
3708 Mt. Diablo Blvd, Ste. 215		San. Dist.			Date Received: 04/27/04	
Lafavette CA 94	1549	Client Contact:	John Sutton		Date Extracted: 04/27/04	
Landyette, CAY)-		Client P.O.:			Date Analyzed: 05/04/04	
Analytical Method: Sl	M5210B	Bioche	mical Oxyge	n Demand*	Work C	Order: 0404404
Lab ID	Clie	ent ID	Matrix		BOD	DF
0404404-002C	М	IW2	W		26	5
0404404-003C	М	IW4	w		52	5
0404404-004C	М	IW5	W		49	5
Reporting Limit	for $DF = 1$; ND mean	s not detected at or	W		4.0 mg/L	
-	above the reporting li	mit	S		NA	
* water samples are re	eported in mg/L.	2 vol. % sediment.				

McC	Campbell An	alytical, Inc.	APPE	NDIX 142nd A Telepł Website: www	Avenue South, #D7, Pacheco, CA 94553-5560 none : 925-798-1620 Fax : 925-798-1622 .mccampbell.com E-mail: main@mccampbell.com	m
The Sutton Grou	ıp	Client Project ID	: #3022.11	; Oro Loma	Date Sampled: 04/27/04	
3708 Mt. Diablo Blvd, Ste. 215		San. Dist.			Date Received: 04/27/04	
Lafavette CA 9	15/19	Client Contact: J	ohn Sutton		Date Extracted: 04/27/04	
Larayette, CA y	-5-7	Client P.O.:			Date Analyzed: 04/29/04	
Analytical Method: S	M5220D		CODF*	k	Work Order	: 0404404
Lab ID	Clie	nt ID	Matrix		CODF	DF
0404404-002B	М	W2	W		120	1
0404404-003B	М	W4	W		190	1
0404404-004B	М	W5	W		220	1
<u> </u>						
Reporting Limit	t for DF = 1; ND mean above the reporting lin	s not detected at or mit	W S		10 mg/L NA	-
* water sample is filte	ered by 0.7 Glass Micr	ofiber Filter and reporte	ed in mg/L.		1121	
		-				

	McCam	pbell A	Analytica	APP al, Inc.		110 2nd Av Telepho Website: www.i	venue South, #D7, Pacheone : 925-798-1620 Fax nccampbell.com E-mail:	co, CA 94553-55 x : 925-798-1622 : main@mccampt	60 pell.com	
The Sut	tton Group		Client F	Llient Project ID: #3022.11; Oro Loma Date Sampled: 04/27/04						
3708 M	lt. Diablo Blvd	, Ste. 215	5 San. Di	st.			Date Received:	04/27/04		
Lafavot			Client C	Contact: John	Sutton		Date Extracted:	05/02/04-0	5/04/04	4
Larayer	lic, CA 94549		Client F	? .0.:			Date Analyzed:	05/02/04-0	5/04/04	4
Extraction	Gasol	ine Rang	ge (C6-C12)	Volatile Hydr Analytical n	rocarbons as nethods: SW80211	Gasoline B/8015Cm	with BTEX and	MTBE* Work	Order: 04	404404
Lab ID	Client ID	Matrix	TPH(g)	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	DF	% SS
001A	MWD1	W		ND	0.59	0.91	ND	0.52	1	99.5
003D	MW4	W	78,000,a	ND<1000	13,000	7800	3200	17,000	200	105
004D	MW5	W	39,000,a	ND<1000	12,000	11,000	920	4300	200	102
Reporting	g Limit for DF =1;	W	50	5.0	0.5	0.5	0.5	0.5	1	μg/L
above t	the reporting limit	S	NA	NA	NA	NA	NA	NA	1	mg/Kg

* water and vapor samples and all TCLP & SPLP extracts are reported in ug/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, product/oil/non-aqueous liquid samples in mg/L.

cluttered chromatogram; sample peak coelutes with surrogate peak.

+The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified gasoline is significant; b) heavier gasoline range compounds are significant(aged gasoline?); c) lighter gasoline range compounds (the most mobile fraction) are significant; d) gasoline range compounds having broad chromatographic peaks are significant; biologically altered gasoline?; e) TPH pattern that does not appear to be derived from gasoline (stoddard solvent / mineral spirit?); f) one to a few isolated non-target peaks present; g) strongly aged gasoline or diesel range compounds are significant; h) lighter than water immiscible sheen/product is present; i) liquid sample that contains greater than ~2 vol. % sediment; j) reporting limit raised due to high MTBE content; k) TPH pattern that does not appear to be derived from gasoline (aviation gas). m) no recognizable pattern.

____Angela Rydelius, Lab Manager

	McCampbell Analytical, Inc. McCampbell Analytical, Inc.										
The Su	tton Group		Client Proje	ect ID: #3022.11; Oro Loma	Date Sampled: 04/2	7/04					
3708 N	It. Diablo Blvd, Ste.	215	San. Dist.		Date Received: 04/2	7/04					
I oform	#= CA 04540		Client Cont	act: John Sutton	Date Extracted: 04/2	7/04					
Laraye	tte, CA 94549		Client P.O.	:	Date Analyzed: 04/2	8/04					
Extraction 1	method: E200.7			Metals* Analytical methods: E200.7		Work Order	: 0404404				
Lab ID	Client ID	Matrix	Extraction	Iron	Manganese	DF	% SS				
002A	MW2	W	DISS.	0.15	4.2	1	N/A				
003A	MW4	W	DISS.	2.3	7.0	1	N/A				
004A	MW5	W	DISS.	0.21	1.6	1	N/A				
Repor	ting Limit for DF $=1$;	W	DISS.	0.05	0.05	m	g/L				
abov	ve the reporting limit	S	TTLC	NA	NA	N	IA				

*water/product/oil/non-aqueous liquid samples and all TCLP / STLC / DISTLC / SPLP extracts are reported in mg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter.

means surrogate recovery outside of acceptance range due to matrix interference; & means surrogate diluted out of acceptance range; ND means not detected above the reporting limit; N/A means not applicable to this sample or instrument.

Analytical Methods: EPA 6010C/200.7 for all elements except: 200.9 (water/liquid- Sb, As, Pb, Se, Tl); 245.1 (Hg); 7010 (sludge/soil/solid/oil/product/wipe/filter - As, Se, Tl); 7471B (Hg).

i) liquid sample that contains greater than ~ 2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations; j) reporting limit raised due to insufficient sample amount; k) results are reported by dry weight; y) estimated values due to low surrogate recovery; z) reporting limit raised due to matrix interference.

____Angela Rydelius, Lab Manager

McCampbell Analytical, Inc. A 110 2nd Avenue South, #D7, Pacheco, CA 94553-5560 Telephone : 925-798-1620 Fax : 925-798-1622 Website: www.mccampbell.com E-mail: main@mccampbell.										
The Sutton G	roup	Client Pro	oject ID: #3022.11; Oro Loma Date Sampled: 04/27/04							
3708 Mt. Dia	blo Blvd, Ste. 215	San. Dist.	Date Received: 04/27/04							
Lafavatta CA	04540	Client Co	ntact: John Sutton Date Extracted: 04/27/04							
Lalayette, CA	X 74J47	Client P.C	D.: Date Analyzed: 05/02/04							
	Diese	l Range (C	10-C23) Extractable Hydrocarbons as Diesel*	101	0404404					
Extraction method:	SW3510C	N ()	Analytical methods: SW8015C Wor	k Order:	0404404					
	Client ID	Matrix	IPH(d)	DF	% 55					
0404404-001B	MWD1	W	110,b	1	108					

Reporting Limit for $DF = 1$;	W	50	μg/L
above the reporting limit	S	NA	NA

* water samples are reported in μ g/L, wipe samples in μ g/wipe, soil/solid/sludge samples in mg/kg, product/oil/non-aqueous liquid samples in mg/L, and all DISTLC / STLC / SPLP / TCLP extracts are reported in μ g/L.

cluttered chromatogram resulting in coeluted surrogate and sample peaks, or; surrogate peak is on elevated baseline, or; surrogate has been diminished by dilution of original extract.

+The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified diesel is significant; b) diesel range compounds are significant; no recognizable pattern; c) aged diesel? is significant; d) gasoline range compounds are significant; e) unknown medium boiling point pattern that does not appear to be derived from diesel; f) one to a few isolated peaks present; g) oil range compounds are significant; h) lighter than water immiscible sheen/product is present; i) liquid sample that contains greater than ~2 vol. % sediment; k) kerosene/kerosene range/jet fuel range; l) bunker oil; m) fuel oil; n) stoddard solvent/mineral spirit.

DHS Certification No. 1644

Angela Rydelius, Lab Manager