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RECEIVED

4:24 pm, Dec 16, 2010
Alameda County
Environmental Health

December 10, 2010

Mr. Jerry Wickham, PG
Senior Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Re: Results of Additional Sub-Slab Soil Vapor Investigation Report
P&D 23rd Avenue Associates
1125 Miller Avenue, Oakland, CA
Clearwater Project No. CB018H
ACEH Fuel Case Leak No. RO0000294

Dear Mr. Wickham,

As the legally authorized representative of the above-referenced project location I have reviewed the attached report prepared by my consultant of record, Clearwater Group, Inc. I 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,

John Protopappas

CLEARWATER
GROUP
Environmental Services

December 10, 2010

Mr. Jerry Wickham, PG
Senior Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Re: Results of Additional Sub-Slab Soil Vapor Investigation
P&D 23rd Avenue Associates, LLC
(Formerly 23rd Avenue Partners)
1125 Miller Avenue, Oakland, CA
Clearwater Project No. CB018H
ACEH Fuel Case Leak No. RO0000294

Dear Mr. Wickham,

Clearwater Group (Clearwater), on behalf of Mr. John Protopappas representing P&D 23rd Avenue Associates, LLC (formerly 23rd Avenue Partners), is pleased to present the *Results of Additional Sub-Slab Soil Vapor Investigation Report* prepared for the project site (*site*) located at 1125 Miller Avenue, Oakland, in Alameda County, California (**Figure 1**).

Alameda County Environmental Health Services (ACEH), in a letter dated August 16, 2010 (**Attachment A**), required re-sampling of the six sub-slab vapor probes installed and sampled previously. Re-sampling was required because of the elevated reporting limits of the method used by the on-site lab. Re-sampling was performed at the existing vapor probe locations (**Figure 2**), on November 4, 2010, by Ross Tinline of SVC Environmental.

Investigation Activities – Event Preparation

No drilling or encroachment permits were required for this investigation. Six sub-slab vapor sampling points had been previously installed, on June 10, 2010, at the locations shown in **Figure 2**. Slab thickness at sample locations SS-1, SS-4, SS-5, and SS-6 was approximately 6 inches. Slab thickness at sample locations SS-2 and SS-3 was approximately 18 inches.

The vapor sampling points consisted of a stainless steel sampling tube set in expanding concrete in a pre-drilled 1-inch diameter hole in the building slab. The tube was held in place by a rubber stopper until the concrete hardened, and a stainless steel flush mount plug was installed in the sampling port to keep the port clean when not in use. During sampling, a stainless steel hose

barb wrapped with Teflon® tape replaced the flush mounted plug. See **Figure 3** for a schematic representation of the sampling port.

In the interval between sampling in June, 2010 and November, 2010, the sampling port SS-5 was damaged by heavy equipment. A bentonite plug was applied at the surface for this event. Sampling notes are included as **Attachment B**.

Soil Vapor Sampling Results

Using EPA Method TO-17, the laboratory reported detectable concentrations of total petroleum hydrocarbons as diesel (TPH-d) in vapor point SS-3 (5,800 µg/m^3). None of the other five sampling points reported concentrations of TPH-d above the laboratory detection limit. The analytical results are summarized below, and complete results are included in **Table 1.** Laboratory reports are included as **Attachment C**.

Sample (ID)	Analytical Method	TPH-d (µg/m^3)	Naphthalene (µg/m^3)	1-Methylnaphthalene (µg/m^3)	2-Methylnaphthalene (µg/m^3)
SS-1	TO-17	ND	ND	ND	ND
SS-2	TO-17	ND	ND	ND	ND
SS-3	TO-17	5,800	8.0	24	36
SS-4	TO-17	ND	ND	ND	ND
SS-5	TO-17	ND	ND	ND	ND
SS-6	TO-17	ND	4.6	ND	4.3
Laboratory Detection Limit	TO-17	5,000	2.5	2.5	2.5

Using EPA Method TO-15, the laboratory reported detectable concentrations of total petroleum hydrocarbons as gasoline (TPH-g) in vapor point SS-3 (13,000 µg/m^3). None of the other five sampling points reported concentrations of TPH-g above the laboratory detection limit. The analytical results are summarized below and complete results are included in **Table 1.** Laboratory reports are included as **Attachment C**.

Sample (ID)	Analytical Method	TPH-g (µg/m^3)	B (µg/m^3)	T (µg/m^3)	E (µg/m^3)	X (µg/m^3)
SS-1	TO-15	ND	ND	ND	ND	ND
SS-2	TO-15	ND	ND	ND	ND	5.3
SS-3	TO-15	13,000	ND	60	560	2940
SS-4	TO-15	ND	ND	ND	ND	ND
SS-5	TO-15	ND	ND	ND	ND	ND
SS-6	TO-15	ND	ND	ND	ND	ND
Laboratory Detection Limit	TO-15	520	8.2	9.7	11	5.2/11

Discussion

Leak detect compound (2-propanol) was confirmed in sample SS-5 (Report 1011189B). This indicates that the sample port was leaking during sampling and contains gases from the sub-slab and indoor air. This does not negate the fact that no detectable levels of TPH-d, TPH-g, benzene, toluene, ethylbenzene, or total xylenes (collectively, BTEX) were collected at SS-5 either sub-slab or indoor air.

Because of the presence of a PG&E natural gas line under the building, sample SS-3 was also analyzed for propane as a constituent of natural gas (Report 1011189C, **Attachment C**). No propane was detected at SS-3.

Only one vapor sampling point, SS-3, which is not near the former dispenser (**Figure 2**), contained measurable amounts of TPH-d. No other vapor sampling points showed detectable levels of this contaminant.

- TPH-d was detected in only one sample, SS-3, at 5,800 $\mu g/m^3$. This level is below the Environmental Screening Level (ESL) of 10,000 $\mu g/m^3$ for residential exposure, as established by the San Francisco Bay Regional Water Quality Control Board.

- Naphthalene was detected in samples from SS-3 (8.0 $\mu g/m^3$) and SS-6 (4.6 $\mu g/m^3$), both of which are below the ESL for residential exposure, 72 $\mu g/m^3$.

- 1-methylnaphthalene was detected in SS-3 (24 $\mu g/m^3$), and 2-methylnaphthalene was detected in SS-3 (36 $\mu g/m^3$) and SS-6 (4.3 $\mu g/m^3$). An Environmental Screening Level (ESL) for these two constituents has not been established by the San Francisco Bay Regional Water Quality Control Board.

Only one vapor sampling point, SS-3, which is not near the former dispenser (**Figure 2**), contained measurable amounts of TPH-g. No other vapor sampling points showed detectable levels of this contaminant.

- TPH-g was detected in sample SS-3 at a level of 13,000 $\mu g/m^3$. This level exceeds the residential ESL (10,000 $\mu g/m^3$) but not the commercial/industrial ESL (29,000 $\mu g/m^3$).

- Benzene was not detected in any of the six sample points, including SS-3, at detection limits ranging from 3.8 to 8.2 $\mu g/m^3$.

- Toluene was detected in SS-3 at a level of 60 $\mu g/m^3$, well below the residential ESL of 63,000 $\mu g/m^3$.

- Ethylbenzene was detected in SS-3 at a level of 560 $\mu g/m^3$. This level is below the ESL for residential exposure (980 $\mu g/m^3$).

- Total xylenes were detected in SS-3 at a combined level of 2,940 µg/m^3, also well below the residential ESL of 21,000 µg/m^3.

Conclusions

There are detectable concentrations of TPH-d at sample point SS-3, but no other points report concentrations of this contaminant above the laboratory reporting limits. The distance from point SS-3 to the known location of contaminants (dispenser island and former tank pit) and the lack of detectable TPH-d vapors between SS-3 and the known sources point to another, unknown, source location.

There are detectable concentrations of TPH-g, toluene, ethylbenzene, and total xylenes at sample point SS-3, but no other sample points detected any TPH-g, toluene, or ethylbenzene. Xylenes were detected in sample point SS-2 at very low levels (just above laboratory reporting limits), but no other sampling points detected xylenes. The lack of any detectable concentrations in any other sampling point except SS-3 also points to another, unknown, source location.

The lack of detectable levels of benzene in any of the samples points to old sources, in which the lighter gas fractions have already dispersed.

Recommendations

In response to the request made in the August 16, 2010, correspondence from ACEH (**Appendix A**), a Workplan is being developed to address the concerns outlined in the letter. The Workplan will include a method to more completely characterize the *site*, including investigation of the unknown source affecting SS-3.

A decision tree regarding sequencing of the investigation including soil borings and groundwater samples is included in **Appendix D**.

A proposed soil boring step out location map (**Figure 4**) is presented to delineate all sources in all media at the site

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Environmental Services

REPORT LIMITATION

All work performed under this contract was directed by a licensed professional. The work was performed in accordance with generally accepted practices at the time the work was performed and completed in accordance with generally acceptable standards. In the course of normal business, recommendations by the in-house professional may include the use of equipment, services, or products in which the Company has an interest. Therefore, the Company is making full disclosure of potential or perceived conflicts of interest to all parties.

This report was prepared under the supervision of a State of California Professional Geologist, Engineer, or other licensed professional. Statements, conclusions, and recommendations made in this report are based on information provided to Clearwater, observations of existing site conditions, our general knowledge of the site, limited testing of selected soil and groundwater samples, and interpretations of a limited set of data. Clearwater cannot be held responsible for the accuracy of the analytical work performed by others.

Information and interpretation presented herein are for the use of the client. Third parties should rely upon the information and interpretation contained in this document at their own risk. No other warranties, certifications, or representations, either expressed or implied, are made about the information supplied in this report. The service performed by Clearwater has been conducted in a manner consistent with the level of care and skill ordinarily exercised by members of our profession currently practicing under similar conditions in the area of the site.

Sincerely,
Clearwater Group

Prepared by:

Erik Lervaag
Project Manager

Reviewed by:

James A. Jacobs, PG #4815, CHG #88
Chief Hydrogeologist

PROFESSIONAL GEOLOGIST
JAMES ALAN JACOBS
NO. 88
CERTIFIED HYDROGEOLOGIST
STATE OF CALIFORNIA

Olivia Jacobs, REA I #3219
Chief Executive Officer

FIGURES:

Figure 1:	Site Vicinity Map
Figure 2:	Sub-Slab Air Sampling Locations
Figure 3:	Sub-Slab Sample Port Schematic
Figure 4:	Proposed Soil and Groundwater Sampling Locations

TABLES:

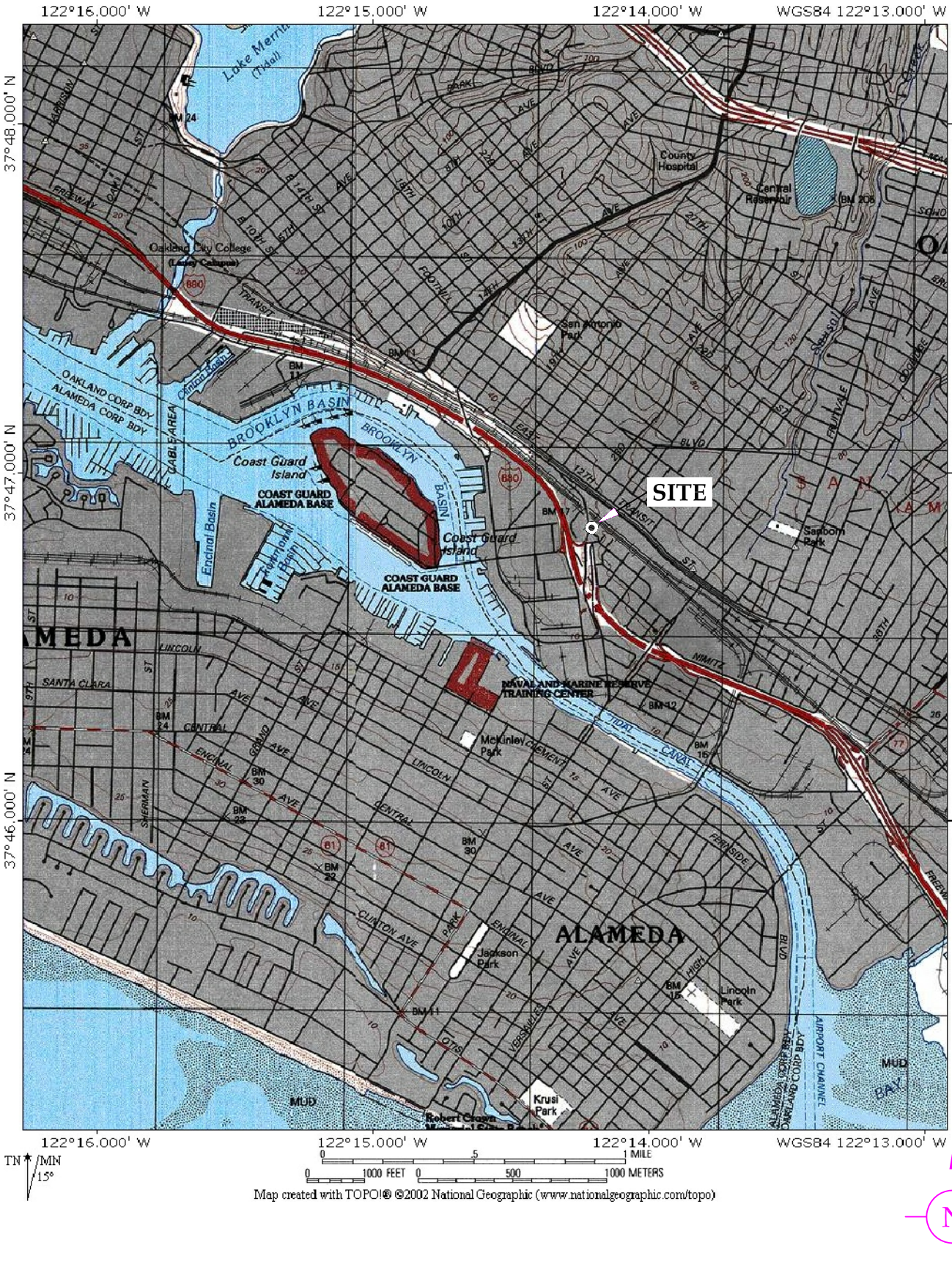
Table 1:	Sub-Slab Soil Vapor Sampling Analytical Results

ATTACHMENTS:

Attachment A:	Correspondence from Alameda County Environmental Health Services; dated August 16, 2010
Attachment B:	Field Notes from November 4, 2010
Attachment C:	Air Toxics Ltd, Laboratory Reports 1011163, 1011189A, 1011189B, and 1011189C
Attachment D:	Decision Tree for Future Investigations

cc: Mr. John Protopappas
P&D 23rd Avenue Associates LLC
c/o: Madison Park Financial Corporation
409 Thirteenth Street, 8th Floor
Oakland, CA 94612

FIGURES

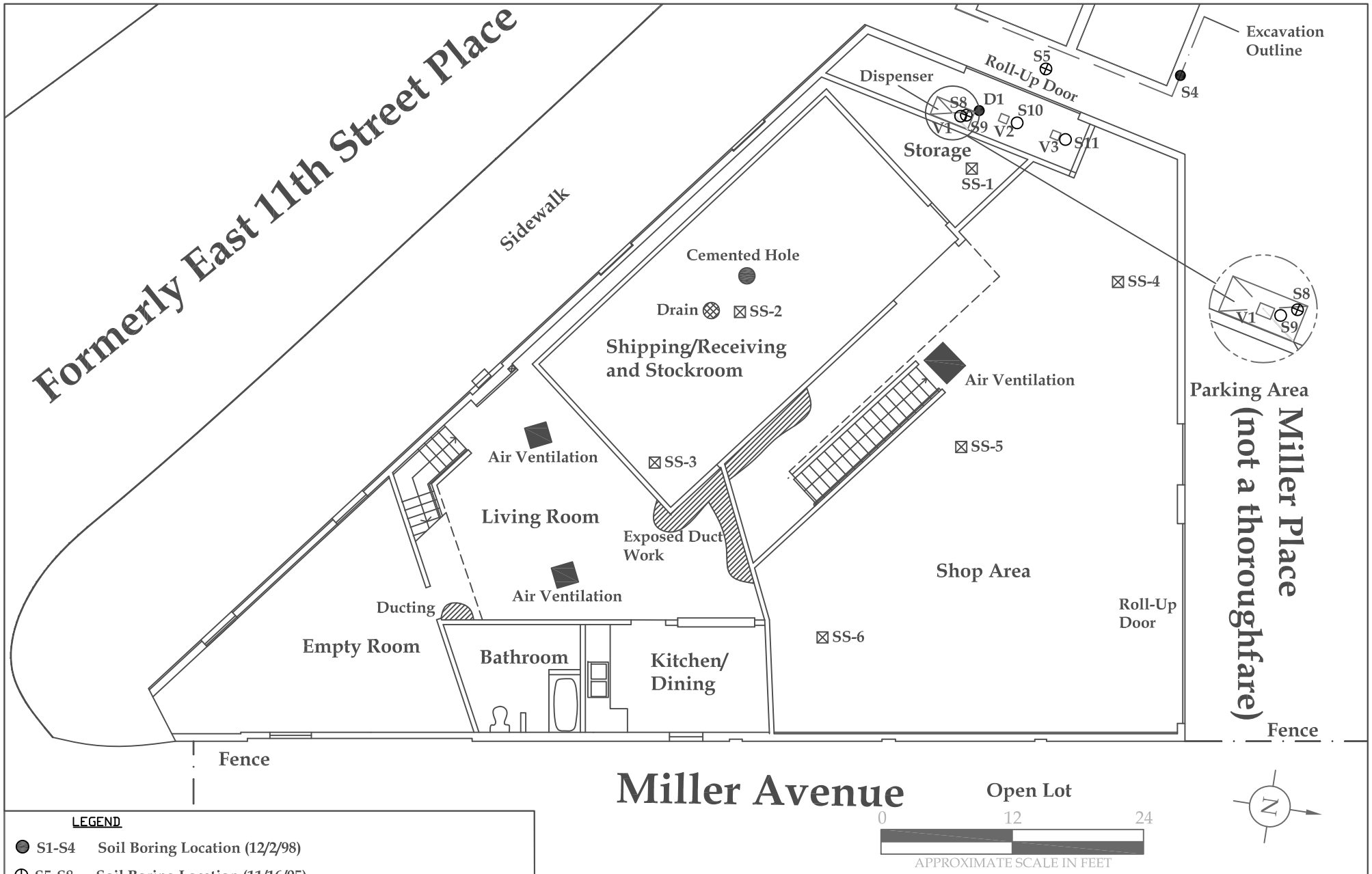


Site Vicinity Map

1125 Miller Avenue
Oakland, California

CLEARWATER GROUP

Project No.	Figure Date	Figure
CB018H	7/10	1



LEGEND

- S1-S4 Soil Boring Location (12/2/98)
- S5-S8 Soil Boring Location (11/16/05)
- S9-S11 Soil Boring Location (11/15/06)
- V1-V3 Soil Vapor Location (11/15/06)
- SS-1 Sub-slab Air Sample Location (11/04/10)

Sub-slab Air Sampling Locations

P&D 23rd Avenue Associates LLC
1125 Miller Avenue
Oakland, California

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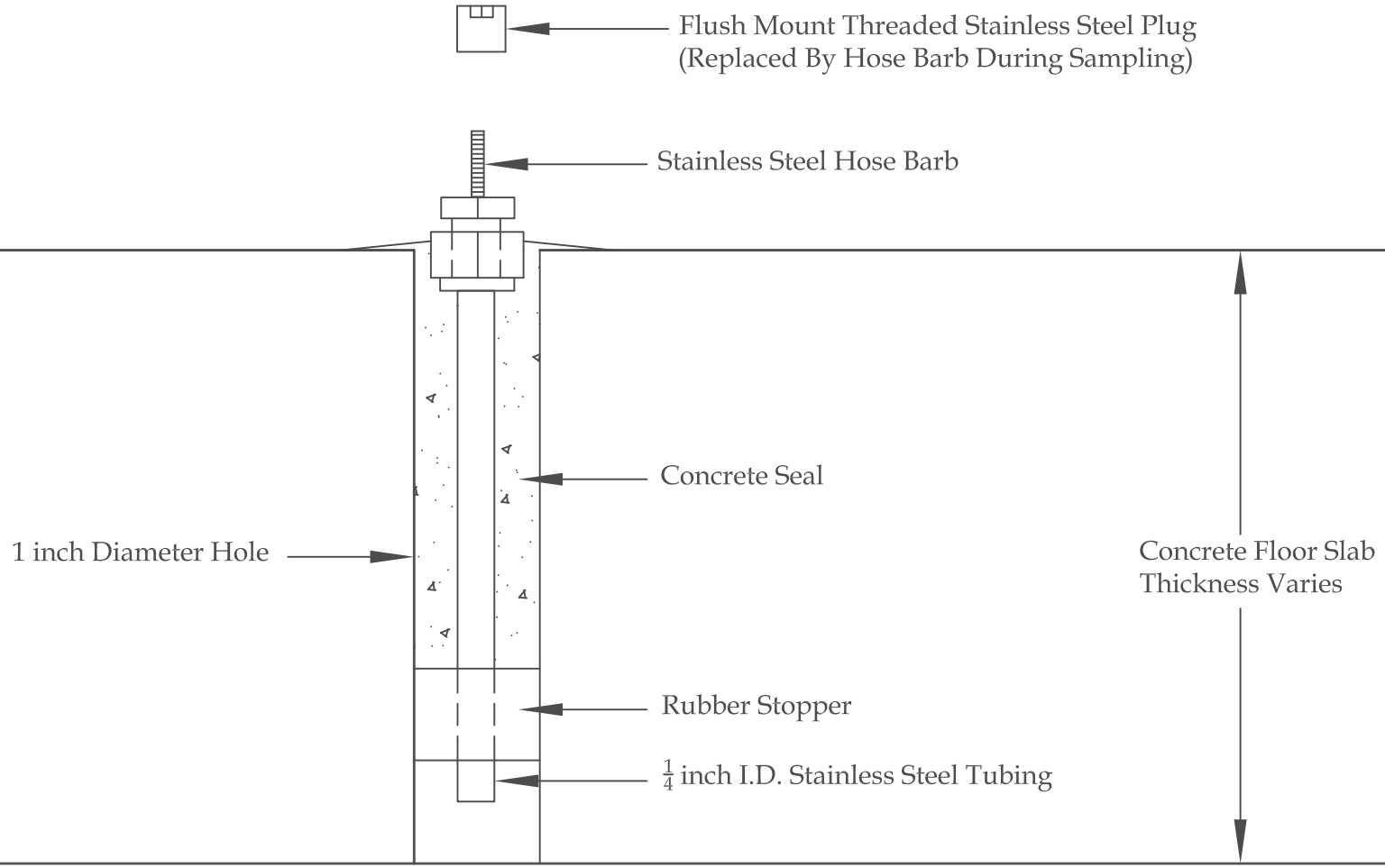
Project No.	Figure Date	Figure
CB018H	**12/10**	**2**



Not to Scale

Sub-Slab Sample Port Schematic

P&D 23rd Avenue Associates LLC
1125 Miller Avenue
Oakland, California

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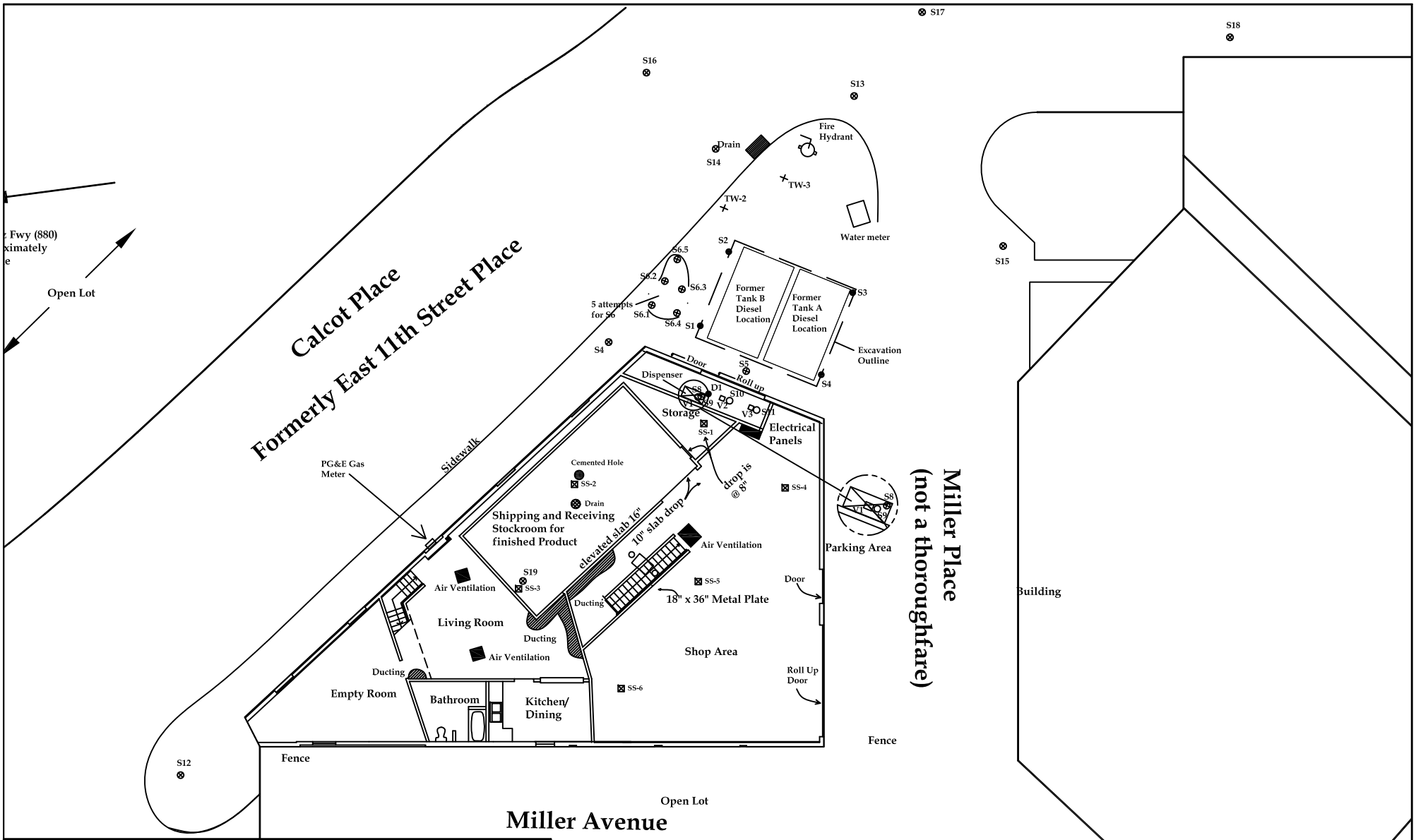
Project No.	Figure Date	Figure
CB018H	**11/10**	**3**



LEGEND

⊗	Proposed Soil Boring Locations
⊠ SS1-SS6	Sub-slab Vapor Location (06/17/10 and 11/04/10)
⊕ S1-S4	Soil Boring Location (12/2/98)
⊕ S5-S8	Soil Boring Location (11/16/05)
● D1	Soil Boring Location (10/24/00)
+ TW-3	Temporary Well (10/24/00)
○ S9-S11	Soil Boring Location (11/15/06)
□ V1-V3	Soil Vapor Location (11/15/06)

0 20 40

APPROXIMATE SCALE IN FEET

N

Proposed Soil Boring Locations

1125 Miller Avenue
Oakland, California

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Project No.	Figure Date	Figure
CB018H	**12/10**	**4**

H:\Department\Jobs\CB018 Miller Ave\CB018H 2007 Workplan for Soil Vapor Sampling\Figures\Fig 4 Proposed Soil Boring Locations

TABLE

TABLE 1
Sub-Slab Soil Vapor Sampling Analytical Results
P&D 23rd Avenue Associates LLC
1125 Miller Avenue
Oakland, CA
Clearwater Project No. CB018H

Sample (ID)	Sampling Date	Analytical Method	TPH-d (µg/m^3)	Naphthalene (µg/m^3)	1-Methylnaphthalene (µg/m^3)	2-Methylnaphthalene (µg/m^3)	TPH-g (µg/m^3)	B (µg/m^3)	T (µg/m^3)	E (µg/m^3)	X (µg/m^3)
V2.2 Suma (200mL/min*30min)	11/15/2006	TO-15	NA	NA	NA	NA	NA	41	43	<7.9	28.4
V2.4 Suma (200mL/min*30min)	11/15/2006	TO-15	NA	NA	NA	NA	NA	<21*	<28*	<24*	<28*
V1.4 1L	11/15/2006	TO-17	**>150,000(S)**	NA	NA	NA	NA	NA	NA	NA	NA
V1.4 4L	11/15/2006	NIOSH 1550	**580,000**	NA	NA	NA	NA	NA	NA	NA	NA
V2.2 1L	11/15/2006	NIOSH 1550	**710,000**	NA	NA	NA	NA	NA	NA	NA	NA
V2.2 4L	11/15/2006	NIOSH 1550	**180,000**	NA	NA	NA	NA	NA	NA	NA	NA
V2.4 1L	11/15/2006	NIOSH 1550	**280,000**	NA	NA	NA	NA	NA	NA	NA	NA
V2.4 4L	11/15/2006	NIOSH 1550	**700,000**	NA	NA	NA	NA	NA	NA	NA	NA
V3.4 1L	11/15/2006	NIOSH 1550	**7,300,000**	NA	NA	NA	NA	NA	NA	NA	NA
V3.4 4L	11/15/2006	NIOSH 1550	**570,000**	NA	NA	NA	NA	NA	NA	NA	NA
SS-1	6/17/2010	8260B	ND	ND	NA	NA	ND	ND	ND	ND	ND
SS-1	11/4/2010	TO-17	ND	ND	ND	ND	--	--	--	--	--
SS-1	11/4/2010	TO-15	--	--	--	--	ND	ND	ND	ND	ND
SS-2	6/17/2010	8260B	ND	ND	NA	NA	ND	ND	ND	ND	ND
SS-2	11/4/2010	TO-17	ND	ND	ND	ND	--	--	--	--	--
SS-2	11/4/2010	TO-15	--	--	--	--	ND	ND	ND	ND	5.3
SS-3	6/17/2010	8260B	ND	ND	NA	NA	**37,000**	ND	2600	**2000**	6050
SS-3 Duplicate	6/17/2010	8260B	ND	ND	NA	NA	**30,000**	ND	2,100	**1,600**	4,990
SS-3	11/4/2010	TO-17	5,800	8.0	24	36	--	--	--	--	--
SS-3	11/4/2010	TO-15	--	--	--	--	**13,000**	ND	60	560	2940
SS-4	6/17/2010	8260B	ND	ND	NA	NA	ND	ND	ND	ND	ND
SS-4	11/4/2010	TO-17	ND	ND	ND	ND	--	--	--	--	--
SS-4	11/4/2010	TO-15	--	--	--	--	ND	ND	ND	ND	ND
SS-5	6/17/2010	8260B	ND	ND	NA	NA	ND	ND	ND	ND	ND
SS-5	11/4/2010	TO-17	ND	ND	ND	ND	--	--	--	--	--
SS-5	11/4/2010	TO-15	--	--	--	--	ND	ND	ND	ND	ND
SS-6	6/17/2010	8260B	ND	ND	NA	NA	ND	ND	ND	ND	ND
SS-6	11/4/2010	TO-17	ND	4.6	ND	4.3	--	--	--	--	--
SS-6	11/4/2010	TO-15	--	--	--	--	ND	ND	ND	ND	ND
ESL			10,000	72	*none*	*none*	10,000	84	63,000	980	21,000
Laboratory Reporting Limits 8260B			50,000	100			10,000	100	200	100	200
Laboratory Reporting Limits TO-15/TO-17			5,000	2.5	2.5	2.5	520	8.2	9.7	11	5.2/11

Notes:

ESL	From *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater* , Table E-2, Revised May 2008.
(µg/m^3)	Micrograms per cubic meter
TPH-d	Total petroleum hydrocarbons detected within the diesel range of C10-C28
TPH-g	Total petroleum hydrocarbons detected within the gasoline range of C6-C12
B	Benzene
T	Toluene

TABLE 1
Sub-Slab Soil Vapor Sampling Analytical Results
P&D 23rd Avenue Associates LLC
1125 Miller Avenue
Oakland, CA
Clearwater Project No. CB018H

E	Ethylbenzene
X	Total Xylenes
ND	Not Detected above laboratory detection limits
NA	Not Analyzed for
--	Not Analyzed for using this method
none	No standard established
V2.2 Suma (200mL/mn*30mn)	Vapor sample collected at 2 feet below ground surface using 6 liter Suma canister at a flow rate of 200 mL per minute for 30 minutes.
V2.4 Suma (200mL/mn*30mn)	Vapor sample collected at 4 feet below ground surface using 6 liter Suma canister at a flow rate of 200 mL per minute for 30 minutes.
V1.4 1L	Vapor sample collected at 4 feet below ground surface using TO-17 Carbotrap 300 tube at a flow rate of 66.7 mL per minute for 15 minutes. Sample was analyzed using modified EPA method TO-17.
V1.4 4L	Vapor sample collected at 4 feet below ground surface using TO-17 Carbotrap 300 tube at a flow rate of 133.3mL per minute for 30 minutes.
TO-15	Samples analyzed using modified EPA method TO-15 for air collected in specially prepared canisters and analyzed by gas chromatography/mass spectromerty (GC/MS).
TO-17	Samples analyzed using modified EPA method TO-17 for air samples collected using multi-bed sorbent tubes and analyzed by GC/MS.
NIOSH 1550	Alternative analytical method used for saturated sorbent tubes using chemical extraction (carbon disulfide) and analyzed using gas chromotography/flame ionization detector (GC/FID).
> ## (S)	Sample results are flagged as greater than saturated peak for analyte.
1L	Sample flow rate equal to 66.7 mililiters a minute for 15 minutes.
4L	Sample flow rate equal to 133.3 mililiters a minute for 30 minutes.

ATTACHMENTS

ATTACHMENT A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

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

August 16, 2010

Mr. Dermot O'Doherty
P&D 23rd Avenue Associates, LLC
P.O. Box 687
Oakland, CA 94604

Subject: Fuel Leak Case No. RO0000294 and Geotracker Global ID T0600177455, 23rd Avenue Partners, 1125 Miller Avenue, Oakland, CA 94601 – Review of Sub-slab Sampling Results

Dear Mr. O'Doherty:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recently submitted document entitled, "*Results of Sub-Slab Soil Vapor Investigation*," dated July 23, 2010 (Report). The Report presents the results from sampling of three sub-slab vapor probes inside the building at 1125 Miller Avenue. Total Petroleum Hydrocarbons as gasoline, ethylbenzene, toluene, and xylenes were detected at elevated concentrations in the original and duplicate sub-slab vapor sample from location SS-3. Location SS-3 is the location farthest from the former underground storage tanks and dispenser where the fuel release(s) are suspected to have occurred. Sub-slab vapor sampling location SS-3 is also adjacent to the portion of the building that is used as a residence.

The Report presents a concluding recommendation for low-risk case closure. As discussed in the technical comments below, we do not concur with the recommendation for low-risk case closure. We request that you prepare a Work Plan that addressed the technical comments below.

TECHNICAL COMMENTS

1. **Contaminants of Concern.** We do not believe there is sufficient evidence to conclude that Total Petroleum Hydrocarbons as gasoline (TPHg) is not a contaminant of concern for this site. A review of compiled soil analytical data in Table 1 of the January 11, 2007 report entitled, "*Results of Soil Vapor Sampling and Soil Boring Sampling Investigation – Risk-Based Corrective Action Report*," indicates that no soil samples were analyzed for TPHg. Review of the referenced table also indicates that benzene was detected at a concentration of 1.4 milligrams per kilogram (mg/kg) in soil sample TW2-16.5, which was collected in the area of the former USTs. Benzene was also detected in the two groundwater samples collected from the site. Based on this information and the detections of TPHg in soil vapor, it appears that the lack of TPHg analyses is a data gap rather than a basis for assuming that TPHg is not a contaminant of concern. We request that you submit a Work Plan to address this data gap. A review of historic site uses is also requested in the Work Plan.

2. **Analyses for Sub-slab Vapor Samples.** The sub-slab soil vapor samples were analyzed using EPA Method 8260B rather than EPA Method TO-15 as proposed in the "*Work Plan for Sub-Slab Vapor Sampling*," dated September 2008. As a result, the reporting limit for benzene exceeds the indoor air goal for benzene by approximately three orders of magnitude. Improved reporting limits are necessary to evaluate the potential from vapor intrusion for benzene. Please see technical comment 3 below.

3. **Screening Evaluation for Sub-slab Soil Vapor Samples.** Table 2 of the Report compares the sub-slab vapor samples to Environmental Screening Levels (ESLs) from Table 2 of the "*Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater*," (Revised May 2008). Table E-2 of the referenced document applies to soil vapor samples collected typically at a depth of approximately 5 feet bgs and is based on attenuation of vapors over approximately 5 feet of soil. Since sub-slab vapor samples are collected directly below the building slab, attenuation over a vertical interval of 5 feet of soil is not applicable. Therefore, an evaluation based on a comparison of sub-slab vapor sample results to ESLs for soil vapor may underestimate potential risks. Sub-slab vapor samples are to be compared to indoor air goals using a default attenuation factor of 0.01 for attenuation between the sub-slab and indoor air. A comparison of the results for SS-3 with application of an attenuation factor of 0.01 indicates that the concentrations of TPHg, ethylbenzene, and xylenes in SS-3 exceed the indoor air goals for residential land use. Based on the results from SS-3 and the elevated reporting limit for benzene, further evaluation of the potential for vapor intrusion to indoor air is needed. At a minimum, re-sampling of the sub-slab probes is required.

4. **Conclusions Regarding Site Characterization.** The July 23, 2010 Report concludes that the site is partially characterized and indicates that no groundwater samples were collected. However, the "*Work Plan for Sub-Slab Vapor Sampling*," dated September 2008, identifies three analytical results for groundwater. One of the requirements to consider a case under low-risk criteria is that the site has been adequately characterized to assess potential risk. In the Work Plan requested below, please indicate whether the limited groundwater results represent a data gap. If so, please propose work to address the data gap accordingly.

5. **Odor Survey.** We previously concurred with a recommendation to interview residents regarding nuisance odors. In the Work Plan requested below, please whether an inquiry has been made regarding possible odors.

TECHNICAL REPORT REQUEST

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

- **October 27, 2010** – Work Plan

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Digitally signed by Jerry Wickham
DN: cn=Jerry Wickham, o, ou, email=jerry.wickham@acgov.org, c=US
Date: 2010.08.17 14:44:29 -07'00'

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Erik Lervaag, Clearwater Group, 229 Tewksbury Avenue, Pt. Richmond, CA 94801 (*Sent via E-mail to: ELervaag@clearwatergroup.com*)

James Jacobs, Clearwater Group, 229 Tewksbury Avenue, Pt. Richmond, CA 94801

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH

Geotracker, File

Attachment 1
Responsible Party(ies) Legal Requirements/Obligations

REPORT REQUESTS

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml.

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.

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	**ISSUE DATE:** July 5, 2005
	REVISION DATE: July 8, 2010
	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 Teena Le Khan.
   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 Page on upper right side of browser, and then scroll down to Open FTP Site in Windows Explorer.
   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.

ATTACHMENT B

CB018

SVC Environmental, Inc. — Field Notes

Client: Clearwater
Facility:
Address: 1125 Miller Ave
Weather:

Project Number: CWG-61
Date: 11-4-10
Time Arrived: 1110
Time Departed:

Time	Notes and Description of Activities
1110	Arrived site and connected threaded fittings affixed to swagelok valves in the closed position to all 6 vapor probes; Regrouted SS-5, as existing grout was cracked and damaged.
1455	Leak checked SS-4 from -17.97"Hg for 10minutes; held tight to -17.92" Hg after 12 minutes
1508	Began purge from 28.74"Hg. to 5.00 by 1513. Approximately 790mL purge utilizing 1L purge summa. 12 drops 91% IPA within shroud
1516	Log# 781 Begin sampling from -28.84"Hg

Time	1517		1518		1519		1520	
"Hg	24.0	20.8	17.8	14.7	12.2	10.0	8.1	6.4
ppmV	3.8	19.2	27.7	31.8	35.1	32.6	33.9	35.1

1521
5.1
35.2

End @ 4.58"Hg

Average = 25.2 ppmV
Peak = 35.9 ppm
Run time = 4 min.

1530	Utilized 50mL syringe to extract 200mL through sorbent tube directly attached to swagelok valve connected to probe; leak checked by pulling and observing return when valve closed. Completed by 1533
1550	Setup and leak checked SS-3 from -20.46"Hg held to after 10minutes -20.37"; sufficiently tight.
1600	Began purge from -22.06"Hg ended @ 4.90 on ~ 571mL purge.

SVC Environmental, Inc. — Field Notes

Client: Clearwater
Facility:
Address: 1125 miller
Weather:

Project Number: CWG-01
Date: 11-4-10
Time Arrived:
Time Departed:

Time	Notes and Description of Activities
1606	SS-3 Sampling begins from 28.79 Log # 982 10 drops IPA within shroud.
Time	1607 1608 1609
"Hg	25.0 21.4 18.4 15.5 12.6 10.2 8.7
ppmV	2.3 6.2 3.5 3.8 4.3 6.1 7.7
	1610 1611 End
	6.4 5.1 4.00 Average = 4.8ppm
	9.0 10.1 10.9 Peak = 11.1 ppm
	Collected TO17 sorbent tube on previous directly connected to swagelok - 200mL/3min.
1633	Set up and leak checked SS-1 in closet from -19.63" Hg held to 19.57" Hg after 10 min.
1644	Began purge from -22.07" Hg in 1L purge can end @ 4.54" Hg @ 1648 for ~ 584mL purge.
1654	12 drops IPA in shroud. begin sampling from 28.70" Hg. Log # 983 loose shroud dye to matt.
Time	1652 1653 1654
"Hg	24.5 21.3 18.5 15.6 13.3 11.1
ppmV	7.2 6.0 5.7 5.7 5.6 6.4
	1655 1656 End Average = 6.3 ppm
	9.0 7.3 5.9 4.60 Peak = 9.8 ppm
	7.3 8.0 8.9 9.5 Run time = 4 min.
1719	Set up SS-2 and leak checked from 19.35" Hg for 10 minutes held to 19.28" Hg after 10 min
1730	Began purge from -21.94" Hg to 4.00 @ 1736 or approximately 597mL purge.
	12 drops IPA within shroud
1736	@ -28.85" Hg Log # 984 began sampling
Time	1737 1738 1739 1740 1741
"Hg	21.5 18.6 16.0 13.3 11.4 9.5 7.8 6.4 5.2
ppmV	5.5 10.9 11.1 5.5 4.8 6.1 6.5 6.8 7.6
	End 4.70" Hg Ave 6.7ppm Peak 14.9 ppm

SVC Environmental, Inc. — Field Notes

Client: Clearwater
Facility:
Address: 1125 Miller
Weather:

Project Number: CWG-01
Date: 11-4-10
Time Arrived:
Time Departed:

Time	Notes and Description of Activities
1753–1756	Collected TO17 sorbent tube as before over 3 minutes at 200mL.
1806	Set up SS-6 and leak checked from -17.84"Hg and held tight to 19.77"Hg after 10 minutes.
1818	Began purge from 21.52"Hg to
	and end @ 1822 @ 5.09"Hg or purge of 549mL.
1823	12 drops IPA within shroud; began sampling from 28.89"Hg. Log #985

Time	1824	1825	1826	1827
"Hg	25.3	22.4	19.5	16.1	14.2	12.1	10.0	8.1
ppmv	4.2	5.6	8.0	9.4	9.3	10.4	13.2	16.4

1829	End
5.30	Average = 9.6 Run time = 4min
20.1	Peak = 20.3ppm

1837–1840	Collected TO17 sorbent tube as previous - 200mL over 3min.
1847	Leak checked SS-5 @ 21.02"Hg. held tight after 11 minutes to 20.24"Hg
1859	Began purge from 21.62"Hg. in 1L summa. End purge @ 4.00"Hg @ 1903, or a 587 mL purge. 12 drops IPA within shroud
1905	Begin sample @ 28.85"Hg Log#986

1906	1907	1908	1909	End
22.4	19	15.7	12.4	10.2	8.1	5.90
4.6	7.8	8.2	14.6	16.4	19.1	18.5

Ave = 10.9ppmv Peak = 22.4ppm

SORBENT SAMPLE COLLECTION

Air Toxics LTD.

CHAIN-OF-CUSTODY RECORD

Sample Transportation Notice
Relinquishing signature on this document indicates that sample is being shipped in compliance with all applicable local, State, Federal, national, and international laws, regulations and ordinances of any kind. Air Toxics Limited assumes no liability with respect to the collection, handling or shipping of these samples. Relinquishing signature also indicates agreement to hold harmless, defend, and indemnify Air Toxics Limited against any claim, demand, or action, of any kind, related to the collection, handling, or shipping of samples. D.O.T. Hotline (800) 467-4922.

180 BLUE RAVINE ROAD, SUITE B
FOLSOM, CA 95630-4719
(916) 985-1000 FAX (916) 985-1020

Page 1 of 1

Project Manager: Olivia Jacobs
Collected by: (Print and Sign) Ross Tinline
Company: Clearwater Group Email: OJacobs@clearwatergroup.com
Address: 229 Tewksbury Ave City: Ft. Richmond State: CA Zip: 94801
Phone: 510 307-9943 Fax: 510 232-2823

Project Info:
P.O. #:
Project #:
Project Name: 1125 Miller.

Turn Around Time:
☒ Normal
☐ Rush
specify

Circle Reporting Units:
ppbv ppmv ug/m³ mg/m³

Lab I.D.	Field Sample I.D. (Location)	Tube # / Cartridge #	Date of Collection	Start Time	End Time	Duration	Final Volume	Analysis Requested
	SS-4	144303	11-4-10	1530	1533	3 min	200mL	TO17 for TPHd, & semivolatile diesel fuel components including naphthalene and methylnaphthalene
	SS-3	147068	11-4-10	1621	1624	3 min	200mL	
	SS-1	143661	11-4-10	1706	1709	3 min	200mL	
	SS-2	130915	11-4-10	1753	1756	3 min	200mL	
	SS-6	130964	11-4-10	1837	1840	3 min	200mL	
	SS-5	137136	11-4-10	1915	1918	3 min	200mL	

Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time
Ross Tinline	11-5-10 435	Fedex	
Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time
Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time

Pump Calibration Information
Pre-test Flow Rate:
Post-test Flow Rate:
Average Flow Rate:
Notes: 50mL syring utilized

Lab Use Only	Shipper Name	Air Bill #	Temp (°C)	Condition	Custody Seals Intact? Yes No None	Work Order #

Air Toxics LTD.

CHAIN-OF-CUSTODY RECORD

Sample Transportation Notice

Relinquishing signature on this document indicates that sample is being shipped in compliance with all applicable local, State, Federal, national, and international laws, regulations and ordinances of any kind. Air Toxics Limited assumes no liability with respect to the collection, handling or shipping of these samples. Relinquishing signature also indicates agreement to hold harmless, defend, and indemnify Air Toxics Limited against any claim, demand, or action, of any kind, related to the collection, handling, or shipping of samples. D.O.T. Hotline (800) 467-4922

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FOLSOM, CA 95630-4719
(916) 985-1000 FAX (916) 985-1020

Project Manager Olivia Jacobs

Collected by: (Print and Sign) Ross Timlin

Company Clearwater Group Email ojacobs@clearwatergroup.com

Address 229 Tewksbury Ave City Pt. Richmond State CA Zip 94801

Phone 510 307-9943 Fax 510 232-2823

Project Info:

P.O. #

Project #

Project Name 1125 Miller Ave

Turn Around Time:

☒ Normal

☐ Rush

specify

Lab Use Only

Pressurized by:

Date:

Pressurization Gas: N_2 He

Lab I.D.	Field Sample I.D. (Location)	Can #	Date of Collection	Time of Collection	Analyses Requested	Canister Pressure/Vacuum Initial	Final	Receipt	Final (psi)	
	SS-4	2064	11-4-10	1516-1520	TPHg, BTEX, and fuel oxygenates by TO15 including leak check compound 2-propanol.	28.94	4.58			00150
	SS-3	33641	11-4-10	1604-1611		28.79	4.00			00993
	SS-1	35548	11-4-10	1651-1656		28.70	4.60			00246
	SS-2	36380	11-4-10	1736-1741		28.85	4.70			6535
	SS-6	34137	11-4-10	1823-1829		28.89	5.30			470
	SS-5	2130	11-4-10	1905-1909		28.85	5.90			270
	SS-5(IPA)	3633	11-4-10	1905-1909	2-propanol only TO15 (5420).	28	3			40775

FC

Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time
	11-5-10 435	Fedex	
Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time
Relinquished by: (signature)	Date/Time	Received by: (signature)	Date/Time

Notes:
* Provide TPHg chromatograms for SS-3 and SS-4
* Additionally analyze SS-3 for Propane.

Lab Use Only	Shipper Name	Air Bill #	Temp (°C)	Condition	Custody Seals Intact? Yes No None	Work Order #

Form 1293 rev.11

ATTACHMENT C

Air Toxics LTD.
Laboratory Services Since 1989

11/19/2010
Ms. Olivia Jacobs
Clearwater Group, Inc.
229 Tewksbury Avenue

Point Richmond CA 94801

Project Name: 1125 Miller.
Project #:
Workorder #: 1011163

Dear Ms. Olivia Jacobs

The following report includes the data for the above referenced project for sample(s) received on 11/6/2010 at Air Toxics Ltd.

The data and associated QC analyzed by Modified TO-17 VI are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Air Toxics Ltd. for your air analysis needs. Air Toxics Ltd. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Kyle Vagadori at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

Kyle Vagadori

Project Manager

Air Toxics LTD.
Laboratory Services Since 1989

WORK ORDER #: 1011163

Work Order Summary

CLIENT:	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801	**BILL TO:**	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801
PHONE:	510-307-9943	**P.O. #**	
FAX:		**PROJECT #**	1125 Miller.
DATE RECEIVED:	11/06/2010	**CONTACT:**	Kyle Vagadori
DATE COMPLETED:	11/19/2010		

FRACTION #	NAME	TEST
01A	SS-4	Modified TO-17 VI
02A	SS-3	Modified TO-17 VI
03A	SS-1	Modified TO-17 VI
04A	SS-2	Modified TO-17 VI
05A	SS-6	Modified TO-17 VI
06A	SS-5	Modified TO-17 VI
07A	Lab Blank	Modified TO-17 VI
08A	CCV	Modified TO-17 VI
09A	LCS	Modified TO-17 VI
09AA	LCSD	Modified TO-17 VI

CERTIFIED BY: Linda D. Frumarn DATE: 11/19/10

Laboratory Director

Certfication numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763,
NY NELAP - 11291, UT NELAP - 9166389892, AZ Licensure AZ0719
Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,
Accreditation number: E87680, Effective date: 07/01/09, Expiration date: 06/30/11
Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630
(916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020

LABORATORY NARRATIVE
EPA Method TO-17
Clearwater Group, Inc.
Workorder# 1011163

Six TO-17 VI Tube samples were received on November 06, 2010. The laboratory performed the analysis via EPA Method TO-17 using GC/MS in the full scan mode. TO-17 sorbent tubes are thermally desorbed onto a secondary trap. The trap is thermally desorbed to elute the components into the GC/MS system for further separation.

Receiving Notes

There were no receiving discrepancies.

Analytical Notes

A sampling volume of 0.200 L was used to convert ng to ug/m3 for the associated Lab Blank.

The reported CCV and LCS for each daily batch may be derived from more than one analytical file due to the client's request for non-standard compounds.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).
J - Estimated value.
E - Exceeds instrument calibration range.
S - Saturated peak.
Q - Exceeds quality control limits.
U - Compound analyzed for but not detected above the reporting limit.
UJ- Non-detected compound associated with low bias in the CCV
N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:
a-File was requantified
b-File was quantified by a second column and detector
r1-File was requantified for the purpose of reissue

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Laboratory Services Since 1989

Summary of Detected Compounds
EPA METHOD TO-17

Client Sample ID: SS-4

Lab ID#: 1011163-01A

No Detections Were Found.

Client Sample ID: SS-3

Lab ID#: 1011163-02A

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	1.6	8.0
2-Methylnaphthalene	0.50	2.5	7.3	36
1-Methylnaphthalene	0.50	2.5	4.9	24
TPH (Diesel Range)	1000	5000	1200	5800

Client Sample ID: SS-1

Lab ID#: 1011163-03A

No Detections Were Found.

Client Sample ID: SS-2

Lab ID#: 1011163-04A

No Detections Were Found.

Client Sample ID: SS-6

Lab ID#: 1011163-05A

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	0.91	4.6
2-Methylnaphthalene	0.50	2.5	0.86	4.3

Client Sample ID: SS-5

Lab ID#: 1011163-06A

No Detections Were Found.

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Client Sample ID: SS-4
Lab ID#: 1011163-01A
EPA METHOD TO-17

File Name:	**11111724**	**Date of Extraction: NA**	**Date of Collection: 11/4/10 3:33:00 PM**
Dil. Factor:	**1.00**		**Date of Analysis: 11/17/10 10:52 PM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	Not Detected	Not Detected
2-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
1-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
TPH (Diesel Range)	1000	5000	Not Detected	Not Detected

Air Sample Volume(L): 0.200
Container Type: TO-17 VI Tube

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	69	50-150
Toluene-d8	89	50-150
Naphthalene-d8	92	50-150

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Client Sample ID: SS-3

Lab ID#: 1011163-02A

EPA METHOD TO-17

File Name:	**11111725**	**Date of Extraction: NA**	**Date of Collection: 11/4/10 4:24:00 PM**
Dil. Factor:	**1.00**		**Date of Analysis: 11/17/10 11:30 PM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	1.6	8.0
2-Methylnaphthalene	0.50	2.5	7.3	36
1-Methylnaphthalene	0.50	2.5	4.9	24
TPH (Diesel Range)	1000	5000	1200	5800

Air Sample Volume(L): 0.200
Container Type: TO-17 VI Tube

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	101	50-150
Toluene-d8	98	50-150
Naphthalene-d8	100	50-150

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Client Sample ID: SS-1
Lab ID#: 1011163-03A
EPA METHOD TO-17

File Name:	**11111726**	**Date of Extraction: NA**	**Date of Collection: 11/4/10 5:09:00 PM**
Dil. Factor:	**1.00**		**Date of Analysis: 11/18/10 12:07 AM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	Not Detected	Not Detected
2-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
1-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
TPH (Diesel Range)	1000	5000	Not Detected	Not Detected

Air Sample Volume(L): 0.200
Container Type: TO-17 VI Tube

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	100	50-150
Toluene-d8	97	50-150
Naphthalene-d8	100	50-150

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-2
Lab ID#: 1011163-04A
EPA METHOD TO-17

File Name:	**11111727**	**Date of Extraction: NA**	**Date of Collection: 11/4/10 5:56:00 PM**
Dil. Factor:	**1.00**		**Date of Analysis: 11/18/10 12:45 AM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	Not Detected	Not Detected
2-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
1-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
TPH (Diesel Range)	1000	5000	Not Detected	Not Detected

Air Sample Volume(L): 0.200
Container Type: TO-17 VI Tube

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	97	50-150
Toluene-d8	96	50-150
Naphthalene-d8	109	50-150

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Laboratory Services Since 1989

Client Sample ID: SS-6

Lab ID#: 1011163-05A

EPA METHOD TO-17

File Name:	**11111728**	**Date of Extraction: NA**	**Date of Collection: 11/4/10 6:40:00 PM**
Dil. Factor:	**1.00**		**Date of Analysis: 11/18/10 01:22 AM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	0.91	4.6
2-Methylnaphthalene	0.50	2.5	0.86	4.3
1-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
TPH (Diesel Range)	1000	5000	Not Detected	Not Detected

Air Sample Volume(L): 0.200
Container Type: TO-17 VI Tube

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	101	50-150
Toluene-d8	98	50-150
Naphthalene-d8	104	50-150

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-5

Lab ID#: 1011163-06A

EPA METHOD TO-17

File Name:	**11111729**	**Date of Extraction: NA**	**Date of Collection: 11/4/10 7:18:00 PM**
Dil. Factor:	**1.00**		**Date of Analysis: 11/18/10 02:00 AM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	Not Detected	Not Detected
2-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
1-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
TPH (Diesel Range)	1000	5000	Not Detected	Not Detected

Air Sample Volume(L): 0.200
Container Type: TO-17 VI Tube

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	89	50-150
Toluene-d8	93	50-150
Naphthalene-d8	97	50-150

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: Lab Blank

Lab ID#: 1011163-07A

EPA METHOD TO-17

File Name:	**11111709**	**Date of Extraction: NA**	**Date of Collection: NA**
Dil. Factor:	**1.00**		**Date of Analysis: 11/17/10 12:09 PM**

Compound	Rpt. Limit (ng)	Rpt. Limit (ug/m3)	Amount (ng)	Amount (ug/m3)
Naphthalene	0.50	2.5	Not Detected	Not Detected
2-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
1-Methylnaphthalene	0.50	2.5	Not Detected	Not Detected
TPH (Diesel Range)	1000	5000	Not Detected	Not Detected

Air Sample Volume(L): 0.200
Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	56	50-150
Toluene-d8	75	50-150
Naphthalene-d8	116	50-150

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: CCV
Lab ID#: 1011163-08A
EPA METHOD TO-17

File Name:	**11111704**	**Date of Extraction: NA**	**Date of Collection: NA**
Dil. Factor:	**1.00**		**Date of Analysis: 11/17/10 07:53 AM**

Compound	%Recovery
Naphthalene	78
2-Methylnaphthalene	90
1-Methylnaphthalene	85
TPH (Diesel Range)	102

Air Sample Volume(L): 1.00
Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	60	50-150
Toluene-d8	72	50-150
Naphthalene-d8	108	50-150

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCS
Lab ID#: 1011163-09A
EPA METHOD TO-17

File Name:	**11111707**	**Date of Extraction: NA**	**Date of Collection: NA**
Dil. Factor:	**1.00**		**Date of Analysis: 11/17/10 10:54 AM**

Compound	%Recovery
Naphthalene	80
2-Methylnaphthalene	92
1-Methylnaphthalene	87
TPH (Diesel Range)	Not Spiked

Air Sample Volume(L): 1.00
Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	60	50-150
Toluene-d8	74	50-150
Naphthalene-d8	105	50-150

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD
Lab ID#: 1011163-09AA
EPA METHOD TO-17

File Name:	**11111708**	**Date of Extraction: NA**	**Date of Collection: NA**
Dil. Factor:	**1.00**		**Date of Analysis: 11/17/10 11:32 AM**

Compound	%Recovery
Naphthalene	75
2-Methylnaphthalene	87
1-Methylnaphthalene	83
TPH (Diesel Range)	Not Spiked

Air Sample Volume(L): 1.00
Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	58	50-150
Toluene-d8	73	50-150
Naphthalene-d8	97	50-150

Air Toxics LTD.
Laboratory Services Since 1989

11/19/2010
Ms. Olivia Jacobs
Clearwater Group, Inc.
229 Tewksbury Avenue

Point Richmond CA 94801

Project Name: 1125 Miller Ave
Project #:
Workorder #: 1011189A

Dear Ms. Olivia Jacobs

The following report includes the data for the above referenced project for sample(s) received on 11/8/2010 at Air Toxics Ltd.

The data and associated QC analyzed by Modified TO-15 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Air Toxics Ltd. for your air analysis needs. Air Toxics Ltd. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Kyle Vagadori at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

Kyle Vagadori

Project Manager

Air Toxics LTD.
Laboratory Services Since 1989

WORK ORDER #: 1011189A

Work Order Summary

CLIENT:	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801	**BILL TO:**	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801
PHONE:	510-307-9943	**P.O. #**	
FAX:		**PROJECT #**	1125 Miller Ave
DATE RECEIVED:	11/08/2010	**CONTACT:**	Kyle Vagadori
DATE COMPLETED:	11/19/2010		

FRACTION #	NAME	TEST	RECEIPT VAC./PRES.	FINAL PRESSURE
01A	SS-4	Modified TO-15	4.6 "Hg	15 psi
02A	SS-3	Modified TO-15	4.0 "Hg	15 psi
03A	SS-1	Modified TO-15	4.4 "Hg	15 psi
04A	SS-2	Modified TO-15	4.8 "Hg	15 psi
05A	SS-6	Modified TO-15	5.4 "Hg	15 psi
06A	SS-5	Modified TO-15	6.0 "Hg	15 psi
07A	Lab Blank	Modified TO-15	NA	NA
07B	Lab Blank	Modified TO-15	NA	NA
08A	CCV	Modified TO-15	NA	NA
08B	CCV	Modified TO-15	NA	NA
09A	LCS	Modified TO-15	NA	NA
09AA	LCSD	Modified TO-15	NA	NA
09B	LCS	Modified TO-15	NA	NA
09BB	LCSD	Modified TO-15	NA	NA

CERTIFIED BY: Linda D. Fruman DATE: 11/19/10

Laboratory Director

Certfication numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763,
NY NELAP - 11291, UT NELAP - 9166389892, AZ Licensure AZ0719
Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,
Accreditation number: E87680, Effective date: 07/01/09, Expiration date: 06/30/11
Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630
(916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020

LABORATORY NARRATIVE
EPA Method TO-15
Clearwater Group, Inc.
Workorder# 1011189A

Six 1 Liter Summa Canister samples were received on November 08, 2010. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the full scan mode.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Receiving Notes

There were no receiving discrepancies.

Analytical Notes

A single point calibration for TPH referenced to Gasoline was performed for each daily analytical batch. Recovery is reported as 100% in the associated results for each CCV.

The results for TPH gasoline were reported as not-detected in samples SS-4, SS-1, SS-2, SS-6 and SS-5 since the chromatographic profiles were not consistent with a gasoline pattern.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).
J - Estimated value.
E - Exceeds instrument calibration range.
S - Saturated peak.
Q - Exceeds quality control limits.
U - Compound analyzed for but not detected above the reporting limit.
UJ- Non-detected compound associated with low bias in the CCV
N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:
a-File was requantified
b-File was quantified by a second column and detector
r1-File was requantified for the purpose of reissue

Air Toxics LTD.
Laboratory Services Since 1989

Summary of Detected Compounds
MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

Client Sample ID: SS-4

Lab ID#: 1011189A-01A

No Detections Were Found.

Client Sample ID: SS-3

Lab ID#: 1011189A-02A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Toluene	2.6	16	9.7	60
Ethyl Benzene	2.6	130	11	560
m,p-Xylene	2.6	480	11	2100
o-Xylene	2.6	190	11	840
TPH ref. to Gasoline (MW=100)	130	3300	520	13000

Client Sample ID: SS-1

Lab ID#: 1011189A-03A

No Detections Were Found.

Client Sample ID: SS-2

Lab ID#: 1011189A-04A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
m,p-Xylene	1.2	1.2	5.2	5.3

Client Sample ID: SS-6

Lab ID#: 1011189A-05A

No Detections Were Found.

Client Sample ID: SS-5

Lab ID#: 1011189A-06A

No Detections Were Found.

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-4

Lab ID#: 1011189A-01A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111025**	**Date of Collection: 11/4/10 3:20:00 PM**	
Dil. Factor:	**2.39**	**Date of Analysis: 11/10/10 06:26 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	4.8	Not Detected	12	Not Detected
Methyl tert-butyl ether	1.2	Not Detected	4.3	Not Detected
Benzene	1.2	Not Detected	3.8	Not Detected
Toluene	1.2	Not Detected	4.5	Not Detected
Ethyl Benzene	1.2	Not Detected	5.2	Not Detected
m,p-Xylene	1.2	Not Detected	5.2	Not Detected
o-Xylene	1.2	Not Detected	5.2	Not Detected
tert-Butyl alcohol	4.8	Not Detected	14	Not Detected
Ethyl-tert-butyl ether	4.8	Not Detected	20	Not Detected
Isopropyl ether	4.8	Not Detected	20	Not Detected
tert-Amyl methyl ether	4.8	Not Detected	20	Not Detected
TPH ref. to Gasoline (MW=100)	60	Not Detected	240	Not Detected

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	113	70-130
4-Bromofluorobenzene	91	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-3

Lab ID#: 1011189A-02A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**p111512**	**Date of Collection: 11/4/10 4:11:00 PM**	
Dil. Factor:	**5.13**	**Date of Analysis: 11/15/10 04:25 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	10	Not Detected	25	Not Detected
Methyl tert-butyl ether	2.6	Not Detected	9.2	Not Detected
Benzene	2.6	Not Detected	8.2	Not Detected
Toluene	2.6	16	9.7	60
Ethyl Benzene	2.6	130	11	560
m,p-Xylene	2.6	480	11	2100
o-Xylene	2.6	190	11	840
tert-Butyl alcohol	10	Not Detected	31	Not Detected
Ethyl-tert-butyl ether	10	Not Detected	43	Not Detected
Isopropyl ether	10	Not Detected	43	Not Detected
tert-Amyl methyl ether	10	Not Detected	43	Not Detected
TPH ref. to Gasoline (MW=100)	130	3300	520	13000

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	101	70-130
1,2-Dichloroethane-d4	96	70-130
4-Bromofluorobenzene	100	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-1

Lab ID#: 1011189A-03A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111026**	**Date of Collection: 11/4/10 4:56:00 PM**	
Dil. Factor:	**2.37**	**Date of Analysis: 11/10/10 06:46 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	4.7	Not Detected	12	Not Detected
Methyl tert-butyl ether	1.2	Not Detected	4.3	Not Detected
Benzene	1.2	Not Detected	3.8	Not Detected
Toluene	1.2	Not Detected	4.5	Not Detected
Ethyl Benzene	1.2	Not Detected	5.1	Not Detected
m,p-Xylene	1.2	Not Detected	5.1	Not Detected
o-Xylene	1.2	Not Detected	5.1	Not Detected
tert-Butyl alcohol	4.7	Not Detected	14	Not Detected
Ethyl-tert-butyl ether	4.7	Not Detected	20	Not Detected
Isopropyl ether	4.7	Not Detected	20	Not Detected
tert-Amyl methyl ether	4.7	Not Detected	20	Not Detected
TPH ref. to Gasoline (MW=100)	59	Not Detected	240	Not Detected

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	100	70-130
1,2-Dichloroethane-d4	111	70-130
4-Bromofluorobenzene	93	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-2

Lab ID#: 1011189A-04A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111027**	**Date of Collection: 11/4/10 5:41:00 PM**	
Dil. Factor:	**2.40**	**Date of Analysis: 11/10/10 07:42 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	4.8	Not Detected	12	Not Detected
Methyl tert-butyl ether	1.2	Not Detected	4.3	Not Detected
Benzene	1.2	Not Detected	3.8	Not Detected
Toluene	1.2	Not Detected	4.5	Not Detected
Ethyl Benzene	1.2	Not Detected	5.2	Not Detected
m,p-Xylene	1.2	1.2	5.2	5.3
o-Xylene	1.2	Not Detected	5.2	Not Detected
tert-Butyl alcohol	4.8	Not Detected	14	Not Detected
Ethyl-tert-butyl ether	4.8	Not Detected	20	Not Detected
Isopropyl ether	4.8	Not Detected	20	Not Detected
tert-Amyl methyl ether	4.8	Not Detected	20	Not Detected
TPH ref. to Gasoline (MW=100)	60	Not Detected	240	Not Detected

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	114	70-130
4-Bromofluorobenzene	93	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-6

Lab ID#: 1011189A-05A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111028**	**Date of Collection: 11/4/10 6:29:00 PM**	
Dil. Factor:	**2.46**	**Date of Analysis: 11/10/10 08:08 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	4.9	Not Detected	12	Not Detected
Methyl tert-butyl ether	1.2	Not Detected	4.4	Not Detected
Benzene	1.2	Not Detected	3.9	Not Detected
Toluene	1.2	Not Detected	4.6	Not Detected
Ethyl Benzene	1.2	Not Detected	5.3	Not Detected
m,p-Xylene	1.2	Not Detected	5.3	Not Detected
o-Xylene	1.2	Not Detected	5.3	Not Detected
tert-Butyl alcohol	4.9	Not Detected	15	Not Detected
Ethyl-tert-butyl ether	4.9	Not Detected	20	Not Detected
Isopropyl ether	4.9	Not Detected	20	Not Detected
tert-Amyl methyl ether	4.9	Not Detected	20	Not Detected
TPH ref. to Gasoline (MW=100)	62	Not Detected	250	Not Detected

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	113	70-130
4-Bromofluorobenzene	93	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-5

Lab ID#: 1011189A-06A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111029**	**Date of Collection: 11/4/10 7:09:00 PM**	
Dil. Factor:	**2.52**	**Date of Analysis: 11/10/10 08:45 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	5.0	Not Detected	12	Not Detected
Methyl tert-butyl ether	1.3	Not Detected	4.5	Not Detected
Benzene	1.3	Not Detected	4.0	Not Detected
Toluene	1.3	Not Detected	4.7	Not Detected
Ethyl Benzene	1.3	Not Detected	5.5	Not Detected
m,p-Xylene	1.3	Not Detected	5.5	Not Detected
o-Xylene	1.3	Not Detected	5.5	Not Detected
tert-Butyl alcohol	5.0	Not Detected	15	Not Detected
Ethyl-tert-butyl ether	5.0	Not Detected	21	Not Detected
Isopropyl ether	5.0	Not Detected	21	Not Detected
tert-Amyl methyl ether	5.0	Not Detected	21	Not Detected
TPH ref. to Gasoline (MW=100)	63	Not Detected	260	Not Detected

Container Type: 1 Liter Summa Canister

Surrogates	%Recovery	Method Limits
Toluene-d8	100	70-130
1,2-Dichloroethane-d4	113	70-130
4-Bromofluorobenzene	95	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: Lab Blank

Lab ID#: 1011189A-07A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111016**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/10/10 02:10 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	2.0	Not Detected	4.9	Not Detected
Methyl tert-butyl ether	0.50	Not Detected	1.8	Not Detected
Benzene	0.50	Not Detected	1.6	Not Detected
Toluene	0.50	Not Detected	1.9	Not Detected
Ethyl Benzene	0.50	Not Detected	2.2	Not Detected
m,p-Xylene	0.50	Not Detected	2.2	Not Detected
o-Xylene	0.50	Not Detected	2.2	Not Detected
tert-Butyl alcohol	2.0	Not Detected	6.1	Not Detected
Ethyl-tert-butyl ether	2.0	Not Detected	8.4	Not Detected
Isopropyl ether	2.0	Not Detected	8.4	Not Detected
tert-Amyl methyl ether	2.0	Not Detected	8.4	Not Detected
TPH ref. to Gasoline (MW=100)	25	Not Detected	100	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	109	70-130
4-Bromofluorobenzene	84	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: Lab Blank

Lab ID#: 1011189A-07B

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**p111506**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 12:20 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	2.0	Not Detected	4.9	Not Detected
Methyl tert-butyl ether	0.50	Not Detected	1.8	Not Detected
Benzene	0.50	Not Detected	1.6	Not Detected
Toluene	0.50	Not Detected	1.9	Not Detected
Ethyl Benzene	0.50	Not Detected	2.2	Not Detected
m,p-Xylene	0.50	Not Detected	2.2	Not Detected
o-Xylene	0.50	Not Detected	2.2	Not Detected
tert-Butyl alcohol	2.0	Not Detected	6.1	Not Detected
Ethyl-tert-butyl ether	2.0	Not Detected	8.4	Not Detected
Isopropyl ether	2.0	Not Detected	8.4	Not Detected
tert-Amyl methyl ether	2.0	Not Detected	8.4	Not Detected
TPH ref. to Gasoline (MW=100)	25	Not Detected	100	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	99	70-130
1,2-Dichloroethane-d4	93	70-130
4-Bromofluorobenzene	99	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: CCV

Lab ID#: 1011189A-08A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111007**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/10/10 10:56 AM**	

Compound	%Recovery
2-Propanol	118
Methyl tert-butyl ether	95
Benzene	108
Toluene	104
Ethyl Benzene	104
m,p-Xylene	104
o-Xylene	100
tert-Butyl alcohol	86
Ethyl-tert-butyl ether	89
Isopropyl ether	109
tert-Amyl methyl ether	91
TPH ref. to Gasoline (MW=100)	100

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	101	70-130
1,2-Dichloroethane-d4	115	70-130
4-Bromofluorobenzene	92	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: CCV

Lab ID#: 1011189A-08B

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**p111502**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 09:33 AM**	

Compound	%Recovery
2-Propanol	106
Methyl tert-butyl ether	111
Benzene	98
Toluene	103
Ethyl Benzene	110
m,p-Xylene	109
o-Xylene	112
tert-Butyl alcohol	108
Ethyl-tert-butyl ether	118
Isopropyl ether	104
tert-Amyl methyl ether	116
TPH ref. to Gasoline (MW=100)	100

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Toluene-d8	104	70-130
1,2-Dichloroethane-d4	98	70-130
4-Bromofluorobenzene	102	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCS

Lab ID#: 1011189A-09A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111005**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/10/10 10:08 AM**	

Compound	**%Recovery**
2-Propanol	122
Methyl tert-butyl ether	98
Benzene	110
Toluene	102
Ethyl Benzene	110
m,p-Xylene	111
o-Xylene	106
tert-Butyl alcohol	92
Ethyl-tert-butyl ether	94
Isopropyl ether	118
tert-Amyl methyl ether	95
TPH ref. to Gasoline (MW=100)	Not Spiked

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
Toluene-d8	100	70-130
1,2-Dichloroethane-d4	109	70-130
4-Bromofluorobenzene	94	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD

Lab ID#: 1011189A-09AA

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**2111006**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/10/10 10:37 AM**	

Compound	**%Recovery**
2-Propanol	115
Methyl tert-butyl ether	95
Benzene	109
Toluene	101
Ethyl Benzene	108
m,p-Xylene	108
o-Xylene	103
tert-Butyl alcohol	86
Ethyl-tert-butyl ether	92
Isopropyl ether	113
tert-Amyl methyl ether	95
TPH ref. to Gasoline (MW=100)	Not Spiked

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
Toluene-d8	100	70-130
1,2-Dichloroethane-d4	114	70-130
4-Bromofluorobenzene	94	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCS

Lab ID#: 1011189A-09B

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**p111503**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 10:52 AM**	

Compound	**%Recovery**
2-Propanol	98
Methyl tert-butyl ether	106
Benzene	93
Toluene	90
Ethyl Benzene	101
m,p-Xylene	100
o-Xylene	103
tert-Butyl alcohol	103
Ethyl-tert-butyl ether	104
Isopropyl ether	92
tert-Amyl methyl ether	104
TPH ref. to Gasoline (MW=100)	Not Spiked

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
Toluene-d8	102	70-130
1,2-Dichloroethane-d4	99	70-130
4-Bromofluorobenzene	102	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD

Lab ID#: 1011189A-09BB

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

File Name:	**p111504**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 11:09 AM**	

Compound	**%Recovery**
2-Propanol	100
Methyl tert-butyl ether	107
Benzene	91
Toluene	90
Ethyl Benzene	103
m,p-Xylene	101
o-Xylene	103
tert-Butyl alcohol	102
Ethyl-tert-butyl ether	106
Isopropyl ether	93
tert-Amyl methyl ether	106
TPH ref. to Gasoline (MW=100)	Not Spiked

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
Toluene-d8	101	70-130
1,2-Dichloroethane-d4	100	70-130
4-Bromofluorobenzene	101	70-130

Air Toxics LTD.
Laboratory Services Since 1989

11/19/2010
Ms. Olivia Jacobs
Clearwater Group, Inc.
229 Tewksbury Avenue

Point Richmond CA 94801

Project Name: 1125 Miller Ave
Project #:
Workorder #: 1011189B

Dear Ms. Olivia Jacobs

The following report includes the data for the above referenced project for sample(s) received on 11/8/2010 at Air Toxics Ltd.

The data and associated QC analyzed by Modified TO-15 (5&20 ppbv) are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Air Toxics Ltd. for your air analysis needs. Air Toxics Ltd. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Kyle Vagadori at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

Kyle Vagadori

Project Manager

Air Toxics LTD.
Laboratory Services Since 1989

WORK ORDER #: 1011189B

Work Order Summary

CLIENT:	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801	**BILL TO:**	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801
PHONE:	510-307-9943	**P.O. #**	
FAX:		**PROJECT #**	1125 Miller Ave
DATE RECEIVED:	11/08/2010	**CONTACT:**	Kyle Vagadori
DATE COMPLETED:	11/19/2010		

FRACTION #	NAME	TEST	RECEIPT VAC./PRES.	FINAL PRESSURE
07A	SS-5 (IPA)	Modified TO-15 (5&20 ppbv	2.0 "Hg	15.0 psi
08A	Lab Blank	Modified TO-15 (5&20 ppbv	NA	NA
09A	CCV	Modified TO-15 (5&20 ppbv	NA	NA
10A	LCS	Modified TO-15 (5&20 ppbv	NA	NA
10AA	LCSD	Modified TO-15 (5&20 ppbv	NA	NA

CERTIFIED BY: Linda D. Fruman DATE: 11/19/10

Laboratory Director

Certfication numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763,
NY NELAP - 11291, UT NELAP - 9166389892, AZ Licensure AZ0719
Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,
Accreditation number: E87680, Effective date: 07/01/09, Expiration date: 06/30/11
Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630
(916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020

Air Toxics LTD.
Laboratory Services Since 1989

LABORATORY NARRATIVE
EPA Method TO-15 Soil Gas
Clearwater Group, Inc.
Workorder# 1011189B

One PAC250 Canister sample was received on November 08, 2010. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the full scan mode. The method involves concentrating up to 50 mLs of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Receiving Notes

There were no receiving discrepancies.

Analytical Notes

There were no analytical discrepancies.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.

Q - Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit.

UJ- Non-detected compound associated with low bias in the CCV

N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue

Air Toxics LTD.
Laboratory Services Since 1989

Summary of Detected Compounds
MODIFIED EPA METHOD TO-15 GC/MS

Client Sample ID: SS-5 (IPA)

Lab ID#: 1011189B-07A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	170	33000	410	81000

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-5 (IPA)

Lab ID#: 1011189B-07A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	**b111510**	**Date of Collection: 11/4/10 7:09:00 PM**	
Dil. Factor:	**8.31**	**Date of Analysis: 11/15/10 02:03 PM**	

Compound	**Rpt. Limit (ppbv)**	**Amount (ppbv)**	**Rpt. Limit (ug/m3)**	**Amount (ug/m3)**
2-Propanol	170	33000	410	81000

Container Type: PAC250 Canister

Surrogates	**%Recovery**	**Method Limits**
1,2-Dichloroethane-d4	94	70-130
Toluene-d8	95	70-130
4-Bromofluorobenzene	117	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: Lab Blank

Lab ID#: 1011189B-08A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	**b111507**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 12:39 PM**	

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
2-Propanol	20	Not Detected	49	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	96	70-130
Toluene-d8	94	70-130
4-Bromofluorobenzene	118	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: CCV

Lab ID#: 1011189B-09A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	**b111504**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 09:59 AM**	

Compound	**%Recovery**
2-Propanol	77

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
1,2-Dichloroethane-d4	94	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	120	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCS

Lab ID#: 1011189B-10A

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	**b111505**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 10:43 AM**	

Compound	**%Recovery**
2-Propanol	77

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
1,2-Dichloroethane-d4	93	70-130
Toluene-d8	95	70-130
4-Bromofluorobenzene	120	70-130

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD

Lab ID#: 1011189B-10AA

MODIFIED EPA METHOD TO-15 GC/MS

File Name:	**b111506**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/15/10 11:24 AM**	

Compound	**%Recovery**
2-Propanol	78

Container Type: NA - Not Applicable

Surrogates	**%Recovery**	**Method Limits**
1,2-Dichloroethane-d4	93	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	118	70-130

Air Toxics LTD.
Laboratory Services Since 1989

11/19/2010
Ms. Olivia Jacobs
Clearwater Group, Inc.
229 Tewksbury Avenue

Point Richmond CA 94801

Project Name: 1125 Miller Ave
Project #:
Workorder #: 1011189C

Dear Ms. Olivia Jacobs

The following report includes the data for the above referenced project for sample(s) received on 11/8/2010 at Air Toxics Ltd.

The data and associated QC analyzed by Modified ASTM D-1945 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Air Toxics Ltd. for your air analysis needs. Air Toxics Ltd. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Kyle Vagadori at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

Kyle Vagadori

Project Manager

Air Toxics LTD.
Laboratory Services Since 1989

WORK ORDER #: 1011189C

Work Order Summary

CLIENT:	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801	**BILL TO:**	Ms. Olivia Jacobs Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801
PHONE:	510-307-9943	**P.O. #**	
FAX:		**PROJECT #**	1125 Miller Ave
DATE RECEIVED:	11/08/2010	**CONTACT:**	Kyle Vagadori
DATE COMPLETED:	11/19/2010		

FRACTION #	NAME	TEST	RECEIPT VAC./PRES.	FINAL PRESSURE
02A	SS-3	Modified ASTM D-1945	4.0 "Hg	15 psi
03A	Lab Blank	Modified ASTM D-1945	NA	NA
04A	LCS	Modified ASTM D-1945	NA	NA
04AA	LCSD	Modified ASTM D-1945	NA	NA

CERTIFIED BY: Linda D. Fruman DATE: 11/19/10

Laboratory Director

Certfication numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763,
NY NELAP - 11291, UT NELAP - 9166389892, AZ Licensure AZ0719
Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,
Accreditation number: E87680, Effective date: 07/01/09, Expiration date: 06/30/11
Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630
(916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020

LABORATORY NARRATIVE
Modified ASTM D-1945
Clearwater Group, Inc.
Workorder# 1011189C

One 1 Liter Summa Canister sample was received on November 08, 2010. The laboratory performed analysis via modified ASTM Method D-1945 for Propane in natural gas using GC/FID. The method involves direct injection of 1.0 mL of sample.

Method modifications taken to run these samples are summarized in the table below. Specific project requirements may over-ride the ATL modifications.

Requirement	*ASTM D-1945*	*ATL Modifications*
Normalization	Sum of original values should not differ from 100.0% by more than 1.0%.	Sum of original values may range between 85-115%. Normalization of data not performed.
Sample analysis	Equilibrate samples to 20-50° F. above source temperature at field sampling	No heating of samples is performed.
Sample calculation	Response factor is calculated using peak height for C5 and lighter compounds.	Peak areas are used for all target analytes to quantitate concentrations.
Reference Standard	Concentration should not be < half of nor differ by more than 2 X the concentration of the sample. Run 2 consecutive checks; must agree within 1%.	A minimum 3-point linear calibration is performed. The acceptance criterion is %RSD </= 15%. All target analytes must be within the linear range of calibration (with the exception of O2, N2, and C6+ Hydrocarbons).
Sample Injection Volume	0.50 mL to achieve Methane linearity.	1.0 mL.

Receiving Notes

There were no receiving discrepancies.

Analytical Notes

There were no analytical discrepancies.

Definition of Data Qualifying Flags

Six qualifiers may have been used on the data analysis sheets and indicate as follows:
J - Estimated value.
E - Exceeds instrument calibration range.
S - Saturated peak.
Q - Exceeds quality control limits.

U - Compound analyzed for but not detected above the detection limit.
M - Reported value may be biased due to apparent matrix interferences.

File extensions may have been used on the data analysis sheets and indicates as follows:
a-File was requantified
b-File was quantified by a second column and detector
r1-File was requantified for the purpose of reissue

Air Toxics LTD.
Laboratory Services Since 1989

Summary of Detected Compounds
NATURAL GAS ANALYSIS BY MODIFIED ASTM D-1945

Client Sample ID: SS-3

Lab ID#: 1011189C-02A

No Detections Were Found.

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: SS-3

Lab ID#: 1011189C-02A

NATURAL GAS ANALYSIS BY MODIFIED ASTM D-1945

File Name:	**9111620**	**Date of Collection: 11/4/10 4:11:00 PM**	
Dil. Factor:	**5.13**	**Date of Analysis: 11/16/10 06:09 PM**	

Compound	**Rpt. Limit (%)**	**Amount (%)**
Propane	0.0051	Not Detected

Container Type: 1 Liter Summa Canister

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: Lab Blank

Lab ID#: 1011189C-03A

NATURAL GAS ANALYSIS BY MODIFIED ASTM D-1945

File Name:	**9111604**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/16/10 09:36 AM**	

Compound	**Rpt. Limit (%)**	**Amount (%)**
Propane	0.0010	Not Detected

Container Type: NA - Not Applicable

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCS

Lab ID#: 1011189C-04A

NATURAL GAS ANALYSIS BY MODIFIED ASTM D-1945

File Name:	**9111602**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/16/10 08:11 AM**	

Compound	%Recovery
Propane	104

Container Type: NA - Not Applicable

Air Toxics LTD.
Laboratory Services Since 1989

Client Sample ID: LCSD

Lab ID#: 1011189C-04AA

NATURAL GAS ANALYSIS BY MODIFIED ASTM D-1945

File Name:	**9111621**	**Date of Collection: NA**	
Dil. Factor:	**1.00**	**Date of Analysis: 11/16/10 07:56 PM**	

Compound	**%Recovery**
Propane	102

Container Type: NA - Not Applicable

ATTACHMENT D

DECISION TREE TO IDENTIFY SOIL BORING LOCATIONS

DRIVER (FOR DECISION)

A. Groundwater Delineation
B. Soil Delineation
C. Find Source in Soil of TPH-g (vapor source)

FOR A:

1. Upgradient Point	S12	on Southern Vertex
2. Cross Gradient Point – SW	S14	in Calcot Place
3. Cross Gradient Point – NW	S15	in Miller Place
4. Down Gradient Point	S13	in Calcot Place

STEP OUTS S16, S17, S18, downgradient from S13, S14, S15.

FOR B: (Already Delineated ☒)

☐ 1. Catch basin and storm sewer in Miller Place. S13, S14, S15 all verify.
☒ 2. Tank Pit. Sample S2 location represents residual. TW-2 confirms ND in soil.
☒ 3. Dispenser Area – several borings. Cross gradient not defined.
   ☐ Cross gradient
   ☒ Down gradient – S-5

FOR C: Confirm SS-3 TPH-g for Source; options local, intermediate or remote.

1. Local – SE of SS-3 – Rule out large source S19
   SS-2 'clean' (to W) SS-6 'clean' (to NE) need definition ☐ E ☐ S
   S19 at site for evaluation of soil source under vapor point
2. If S12 is clean, iterate between S19 and S12.
   Since SS-6 (20 feet to NE) and SS-2 (20 feet to W) are low, then radius of detection is < 20'. So the source for SS-3 is expected to be <20 feet away. Step radially away from SS-3.
3. Remote but channeled. Must chase conduits ☐