KAPREALIAN ENGINEERING
INCORPORATED

STD
10039

November 5, 1996

Bay Area Air Quality Management District
Permit Services Division
939 Ellis Street
San Francisco, CA 94109

Attention: Mr. Robert E. Cave, Air Quality Engineer II

RE: Application Number 25153
2225 Telegraph Avenue
Oakland, California

Dear Mr. Cave:

As shown on the attached sheet, the samples collected on October 23, 1996 (with the Catox abatement device) indicate that the system did not achieve a minimum of 90% abatement of total petroleum hydrocarbons as gasoline. However, benzene was not detected in the sample collected from the system's point of emission. A copy of the laboratory sheets for the recent sample are attached to this report.

Kaprealian Engineering, Inc. (KEI) recommended in a letter to the BAAQMD dated October 29, 1996, to replace the abatement device for the system with two 2,000-pound carbon canisters. After collecting compliance verification samples, the system was turned off on October 23, 1996, for preparation of the abatement device change. However, the system has not yet operated with the carbon abatement device. The proposed abatement device is expected to provide operation of the system in compliance because it is better suited for abatement of the low influent concentrations of hydrocarbons.

KEI's above referenced letter contained calculations indicating breakthrough would not occur until 177 days of system operation. Therefore, KEI recommended that monitoring of the system be conducted once every two weeks. KEI is currently waiting for a written response, as mandated by our BAAQMD permit, to our request.

2401 Stanwell Drive, Suite 400
Concord, California 94520
Tel: 510.602.5100 Fax: 510.687.0602

If you have any questions, please do not hesitate to call me at (510) 602-5106.

Sincerely,

Kaprealian Engineering, Inc.

Sarkis A. Soghomonian
Project Engineer

SAS:jad\REC1105

Attachment

cc: Ms. Karen Petryna, Texaco
Mr. Dale Klettke, ACHCS

2225 Telegraph Avenue
Oakland, California

SUMMARY OF LABORATORY RESULTS
AIR

Date	Sample	TPH-G	Benzene	Toluene	Ethyl-benzene	Xylenes
10/23/96	Influent	40	0.30	0.65	<0.2	1.3
	Effluent	15	<0.2	0.43	<0.2	0.87
10/10/96	Influent	160	1.5	2.0	0.34	1.9
	Effluent	16	<0.2	0.65	<0.2	0.78
9/26/96	Influent	13	<0.2	<0.2	<0.2	<0.4
	Effluent	<10	<0.2	<0.2	<0.2	<0.4
9/11/96	Influent	160	1.6	2.1	0.37	1.7
	Effluent	<10	<0.2	0.56	<0.2	<0.4
8/22/96	Influent	64	1.2	2.7	0.48	2.3
	Effluent	<10	<0.2	<0.2	<0.2	<0.4
8/06/96	Influent	89	1.1	1.0	0.53	2.2
	Effluent	18	<0.2	0.4	<0.2	0.73
7/17/96	Influent	540	5.5	30	3.5	16
	Effluent	12	<0.2	<0.2	<0.2	0.71
7/02/96	Influent	110	0.59	0.76	<0.2	0.84
	Effluent	<10	<0.2	<0.2	<0.2	<0.2
6/19/96	Influent	240	2.4	3.9	0.63	3.1
	Effluent	<10	<0.2	<0.2	<0.2	0.43
6/05/96	Influent	160	0.65	1	<0.4	1.2
	Effluent	19	<0.2	<0.2	<0.2	0.53
5/22/96	Influent	170	1.4	1.8	0.30	1.9
	Effluent	<10	<0.2	<0.2	<0.2	0.48
5/07/96	Influent	74	12	4.6	3.5	11
	Effluent	<10	<0.2	<0.2	<0.2	<0.2
4/25/96	Influent	110	2.0	2.1	0.32	2.0
	Effluent	<10	<0.2	0.62	<0.2	1.1
4/09/96	Influent	940	12	3.0	1.7	3.6
	Effluent	<10	<0.2	<0.2	<0.2	<0.2
1/24/96	Influent	1,900	37	13	6.3	16
	Effluent	<10	<0.2	0.28	<0.2	1.2

B C Analytical

801 Western Avenue
Glendale, CA 91201
818/247-5737
Fax: 818/247-9797

ANALYTICAL REPORT

LOG NO: G96-10-518

Received: 23 OCT 96

Mailed:

Mr. John Giddings
Kaprealian Engineering, Inc.
2401 Stanwell Drive, Suite 400
Concord, California 94520

Purchase Order: 94-1446346+4370

Requisition: 624880195
Project: FKEP1015L

REPORT OF ANALYTICAL RESULTS

VAPOR

SAMPLE DESCRIPTION	DATE SAMPLED	TPH/BTEX (CADHS/8020) Date Analyzed Date	Dilution Factor Times	TPH-g mg/M3	Benzene mg/M3	Toluene mg/M3	Ethyl-Benzene mg/M3	Total Xylenes Isomers mg/M3	Carbon Range .
RDL			1	10	0.2	0.2	0.2	0.4	
1*Influent	10/23/96	10/25/96	1	40	0.30	0.65	<0.2	1.3	C6-C12
2*Effluent	10/23/96	10/25/96	1	**15**	<0.2	**0.43**	<0.2	**0.67**	C6-C12

Karen Petryna
2225 Telegraph Ave., Oakland
Alameda County

Greta Galoustian, Laboratory Director

BCA

: ORDER PLACED FOR CLIENT: Kaprealian Engineering, Inc. 9610518 :
: BC ANALYTICAL : GLEN LAB : 11:[illegible]24 29 OCT 1996 - P. 1 :

SAMPLES...	SAMPLE DESCRIPTION..	DETERM.....	DATE..... ANALYZED	METHOD.....	EQUIP.	BATCH..	ID.NO
9610518*1	Influent	GAS.BTX.TES.VA	10.25.96	8015M	536-36	966163	6843
9610518*2	Effluent	GAS.BTX.TES.VA	10.25.96	8015M	536-36	966163	6843

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Notes: Equipment = BC Analytical identification number for a particular piece of analytical equipment.

ID.NO = BC Analytical employee identification number of analyst.

BC ANALYTICAL, GLENDALE
QC REPORT FOR 9610518
DATE PRINTED: 29 OCT 1996

VAPOR SAMPLES	------ METHOD BLANK ------				---------- LAB CONTROL ----------								---------- MATRIX QC ----------									
					LCS		LCSD					RPD	RPD	MS		MSD					RPD	RPD
	UNITS	RESULT	RDL	FLG	%REC	FLG	%REC	FLG	LCL	UCL	RPD	UCL	FLG	%REC	FLG	%REC	FLG	LCL	UCL	RPD	UCL	FLG
Batch: GAS*966163 Method: 8015M - Modified 8015																						
Benzene	mg/M3	0	0.2	-	95	-	93	-	73	123	2	24	-	-	-	-	-	-	-	-	-	-
Toluene	mg/M3	0	0.2	-	96	-	93	-	75	125	3	25	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	mg/M3	0	0.2	-	89	-	86	-	71	112	3	25	-	-	-	-	-	-	-	-	-	-
Total Xylene Isomers	mg/M3	0	0.4	-	93	-	90	-	68	130	3	25	-	-	-	-	-	-	-	-	-	-
TPH (Gasoline Range)	mg/M3	0	10	-	96	-	102	-	61	130	6	25	-	-	-	-	-	-	-	-	-	-
[a,a,a-Trifluorotoluene]	Percent	104	-	-	103	-	103	-	76	129	-	-	-	-	-	-	-	-	-	-	-	-

: SURROGATE RECOVERIES :
: BC ANALYTICAL : GLEN LAB : 11:18:42 29 OCT 1996 - P. 1 :

METHOD	ANALYTE	BATCH	ANALYZED	REPORTED	TRUE	%REC	FLAG
9610518*1							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	52.9	50.0	106	
9610518*2							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	51.7	50.0	103	

: SURROGATE RECOVERIES :
: BC ANALYTICAL : GLEN LAB : 11:18:50 29 OCT 1996 - P. 1 :

METHOD	ANALYTE	BATCH	ANALYZED	REPORTED	TRUE	%REC	FLAG
B6101754*1*MB							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	52.2	50.0	104	
C6103316*1*LC							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	51.7	50.0	103	
C6103316*1*LT							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	50.0	50.0	100	
C6103317*1*LC							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	51.4	50.0	103	
C6103317*1*LT							
8015M	a,a,a-Trifluorotoluene	Re966163	10/25/96	50.0	50.0	100	

KAPREALIAN ENGINEERING
INCORPORATED

G96-10-518

CHAIN OF CUSTODY

SAMPLER: John Coddings
WITNESSING AGENCY:

SITE NAME & ADDRESS: Texaco / Oakland
7225 Telegraph Ave

SAMPLE ID NO.	DATE	TIME	Air ~~Soil~~	WATER	GRAB	COMP	NO. OF CONT.	SAMPLING LOCATION	ANALYSES REQUESTED: TPH-G	ANALYSES REQUESTED: BTEX
Inf.	10/23/96		"				1		/	/
Eff	"		"				1		/	/

TURN AROUND TIME: Regular

REMARKS

Relinquished by: (Signature)	Date/Time	Received by: (Signature)
John Coddings	10/23 15:05	Monica Martinez 10/24/96
Monica Martinez	10/23/96 1730	Sharon Malone 0800
Relinquished by: (Signature)	Date/Time	Received by: (Signature)
Relinquished by: (Signature)	Date/Time	Received by: (Signature)

The following MUST BE completed by the laboratory accepting samples for analysis:

1. Have all samples received for analysis been stored in ice?
2. Will samples remain refrigerated until analyzed?
3. Did any samples received for analysis have head space?
4. Were samples in appropriate containers and properly packaged?

Signature _____ Title _____ Date _____

2401 Stanwell Drive, Suite 400
Concord, California 94520
Tel: 510 602 5100 Fax: 510 687 0602