CAMBRIA

November 8, 2000

Scott Seery Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Regulatory Response

Former Shell Service Station 15275 Washington Avenue San Leandro, California Incident #97088270 Cambria Project #242-0933-002 DO NOV 13 PM 5: 30



Dear Mr. Seery:

Cambria Environmental Technology (Cambria) has prepared this letter response on behalf of Equiva Services LLC. The letter is in response to a letter from the Alameda County Health Care Services Agency (ACHCSA) dated October 5, 2000 which specifically addressed issues related to the soil vapor extraction (SVE) system onsite and groundwater monitoring well SR-1.

SVE SYSTEM SUMMARY

The SVE system consists of a 100 cubic-feet-per-minute, electric catalytic oxidizer that formerly extracted soil vapors from two horizontal vapor trenches completed on the east and west sides of the existing onsite building. Vapors were also extracted from the soil vapor extraction well SV-1 and monitoring wells S-1, S-3, S-5, S-7, S-8, and SR-1 (Figure 1). During system operation between May 18, 1998 and August 31, 1999, the SVE system removed approximately 1,410 pounds of vapor-phase hydrocarbons from beneath the site. Historical performance and analytical data for the SVE system are summarized in Table 1. The total petroleum hydrocarbons as gasoline (TPHg) influent concentration decreased from 1,600 parts per million by volume (ppmv) in May, 1998 to 218 ppmv in August, 1999. Benzene concentrations decreased during that same time period from 47 ppmv to <0.0314 ppmv. Historical influent TPHg and benzene concentrations are presented on Figure 2. Cumulative TPHg mass removal is presented on Figure 3.

Oakland, CA Saπ Ramon, CA Sonoma, CA

Cambria Environmental Technology, Inc.

1144 65th Street Suite B Oakland, CA 94608 Tel (510) 420-0700 Fax (510) 420-9170 For several months prior to August 1999, the SVE system experienced a problem that caused the system to shut off after short periods of operation. During each site visit, Cambria attempted to troubleshoot the problem, but was not successful. On October 7, 1999, the system was started to

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obtain soil vapor samples. Due to problems with the analytical lab courier which prevented sample analysis within the proper holding time, those samples were never analyzed. It was expected that the results of those samples would provide final confirmation that influent hydrocarbon concentrations had reached asymptotic levels. However, as is apparent in Figure 2, asymptotic hydrocarbon concentration levels had been reached by early 1999.

RESPONSE TO OCTOBER 5, 2000 LETTER



The October 5, 2000 ACHCSA letter recounts statements made by Cambria in the four most recent quarterly groundwater monitoring reports (the third quarter 1999 report and the first, second and third quarter 2000 reports). The letter also makes requests for work related to the SVE system onsite. Our responses follow excerpts from the ACHCSA letter, as indicated below.

Cambria's 1st quarter 2000 report states "...[s]ince influent concentrations have decreased, the system was not operated during the first quarter of 2000." No mention of the October 7, 1999 influent and effluent sample analysis is made, nor are the laboratory results for such provided.

✓ As stated above, the October 7, 1999 samples were never analyzed.

Cambria's 2nd quarter 2000 report indicates that the system was not operated during that quarter. No mention is made of previous plans to restart the system in April or May to troubleshoot the reported problems. However the report now states that "[t]he SVE system will remain off due to low influent concentrations. As before, no laboratory data are provided to support this determination.

In the second quarter report, Cambria discussed the decrease in soil vapor hydrocarbons while the system was in operation and provided a graph (Figure 2) which clearly indicates asymptotic levels had been reached by early 1999. The laboratory reports for system influent samples have been included in the appropriate quarterly reports.

In the absence of documentation supporting the expenditure of resources to "troubleshoot" the system, it appears that the earlier proposals to do so have never been fulfilled.

As stated above, Cambria made attempts to troubleshoot the SVE system in site visits during 1999. Cambria succeeded in restarting the system on October 19, 2000 and left the system running. Cambria visited the site again on October 24, and 26, 2000 and again attempted to troubleshoot the system. The system was shut down upon arrival on October 24 and October 26, 2000. Cambria was not successful in determining the system shut-off problems,

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however the problems are most likely caused by low system flow or power interruptions.

At this time Equilon is directed to reinstate operation of SVE system before the onset of the rainy season in order to evaluate its efficacy as a viable remediation alternative at this site.

As stated above, the SVE system was restarted on October 19, 2000 and was found shut down on October 24, 2000. Cambria restarted the SVE system on October 24, 2000 and the system was again found shut down on October 26, 2000. An influent air sample was collected on October 26, 2000, however the system operation could not be sustained. Cambria left the site on October 26, 2000 with the system shut down.



The influent air sample collected on October 26, 2000 confirmed the low influent concentrations observed in August 1999. The sample contained 22.7 ppmv TPHg and 1.04 ppmv MTBE. No benzene was detected in the influent sample. The influent air sample analytical data is presented in Attachment A. Figure 2 again demonstrates that system influent concentrations have reached asymptotic levels. Due to these low influent concentrations, SVE is not effective for reducing residual hydrocarbon vapors and the system is no longer a viable remediation alternative at the site. Therefore, we believe it is inappropriate to resume operation of the SVE system.

Please submit your plans to salvage well SR-1 to regain full use of it as a sampling and monitoring point prior to the next scheduled sampling and monitoring event.

The casing of well SR-1 has apparently been compromised and the well is filled with soil. However, other wells very close to SR-1, namely S-3, S-5 and S-7, are monitored periodically. Because of the existing adequate well network, well SR-1 is not essential to the current monitoring program and we do not believe restoring the well for monitoring purposes is economically feasible or warranted.

CAMBRIA CLOSING

Please call Darren Croteau at (510) 420-3331 if you have any questions or comments.

Sincerely,

cc:

Cambria Environmental Technology, Inc

Darren Croteau Project Geologist

Stephan A. Bork, C.E.G., C.HG.

Associate Hydrogeologist

Figures: 1 - Groundwater Elevation Contour Map

2 - Historical Influent TPHg and Benzene Concentrations vs. Time

3 - Cumulative TPHg Mass Removal by Soil Vapor Extraction vs. Time

No. EG 2058 CERTIFIED ENGINEERING GEOLOGIST

Table: 1 - Soil Vapor Extraction System Performance and Summary

Attachment: A - Certified Laboratory Analytical Report

Karen Petryna, Equiva Services LLC, P.O. Box 7869, Burbank, California 91501-7869

Mike Bakaldin, San Leandro Fire Department, Civic Center, 835 E. 14th Street, San

Leandro, California 94577

Jonathan Redding, Fitzgerald, Abbott & Beardsley LLP, 1221 Broadway, 21st Floor,

Oakland, California 94612

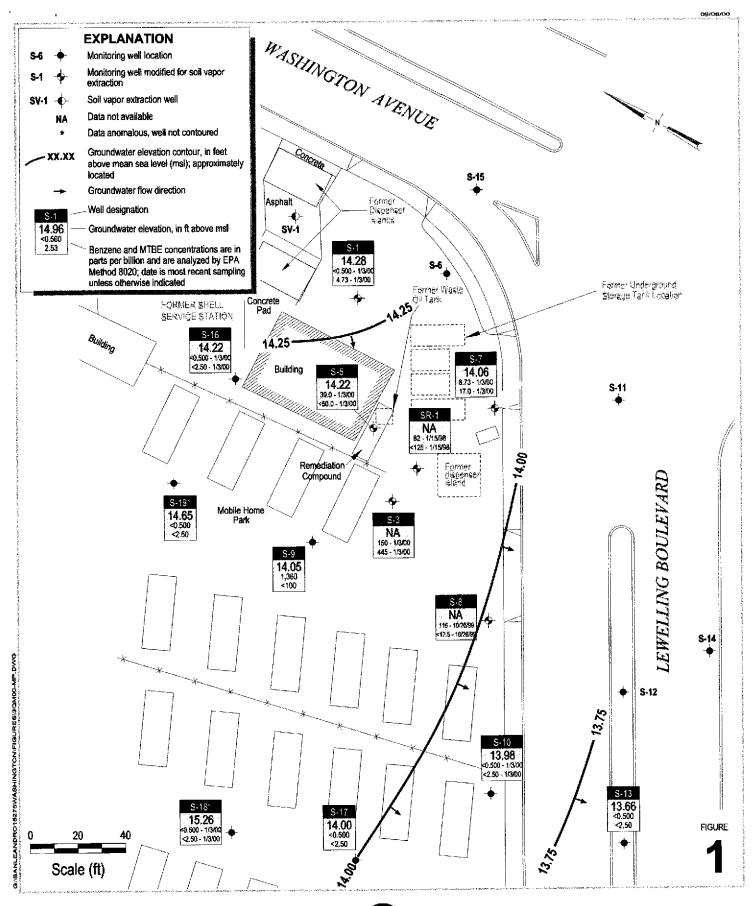
Richard Waxman, Wendell, Rosen, Black & Dean, P.O. Box 2047, Oakland, California

94604-2047

Salel Enterprises, PO Box 5099, Oakland, CA 94605-0099

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Former Shell Service Station

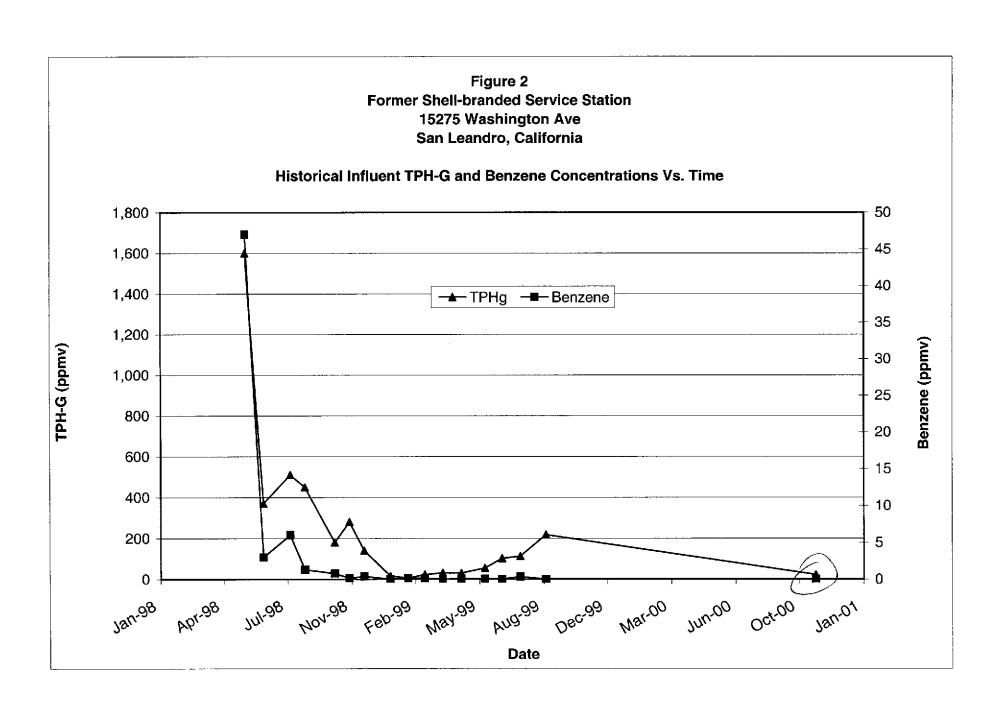
15275 Washington Avenue San Leandro, California Incident #97088270



Groundwater Elevation Contour Map

CAMBRIA

July 12, 2000



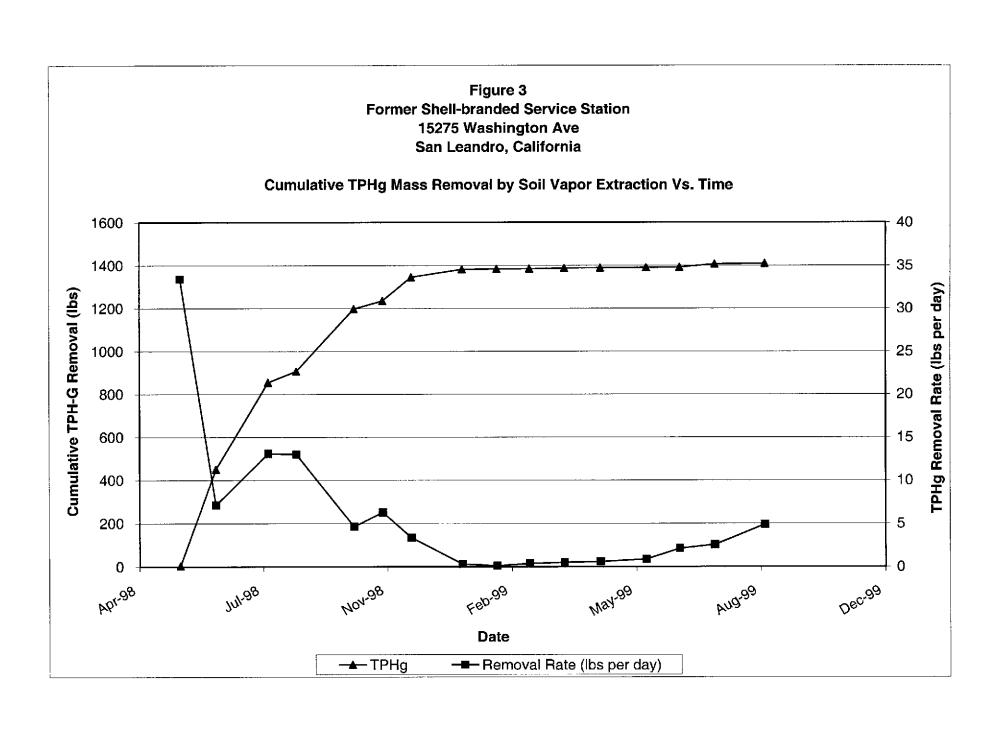


Table 1. Soil Vapor Extraction System Performance and Summary - Former Shell Service Station, Incident #97088270, 15275 Washington Avenue, San Leandro, California

	Interval	System			HYDROCARBON C			CONCE	NTRATIO	NS	TPHg	Cumulative_	EMISSIC	ON RATES		
	Days of	Flow	System	Operating		Influen	t		Effluer	ıt	Removal	TPHg	TPHg	Benzene	TPHg	
	Operation	Rate	Vacuum	Temp.1	OVA	TPHg	Веплепе	OVA	TPHg	Benzene	Rate	Removal	Rate	Rate	Destruction	
Date	(days)	(CFM)	("H2O)	(°F)	←		(p	omv) 			(#/day)	(#)	(#/day)	(#/day)	Efficiency	Comments
																_
05/18/98	0.125	65	20	1,003		1,600	47		< 14	< 0.16	33	4	0.29	0.00	99.1%	Startup
06/16/98	22	60	22	886		370	3		< 2.8	< 0.031	7	450	0.02	0.00	99.2%	
07/28/98	40	80	40	760		510	6		< 2.8	< 0.031	13	854	0.04	0.00	99.5%	
08/20/98	4	90	47	759		450	1.3		< 2.8	< 0.031	13	906	0.00	0.00	99.4%	
10/05/98	33	80	40	715		180	< 0.78		< 2.8	< 0.031	5	1,197	0.03	0.00	98.4%	
10/28/98	7	70	49	707		280	< 0.16		< 2.8	< 0.031	6	1,235	0.01	0.00	99.0%	
11/20/98	23	75	40	675		140	0.40		< 2.8	< 0.031	3	1,346	0.02	0.00	98.0%	
12/31/98	19.5	60	25	670		16	< 0.031		< 2.8	< 0.031	0.3	1,382	0.02	0.00	82.5%	
01/28/99	7	53	21	668		6.2	0.16		< 2.8	< 0.031	0.1	1,383	0.01	0.00	54.8%	•
02/23/99	6	50	21	665		22.8	0.16		< 2.8	< 0.031	0.4	1,385	0.01	0.00	87.7%	
03/23/99	6	50	22	680		31.5	< 0.031		< 2.8	< 0.031	0.5	1,387	0.01	0.00	91.1%	
04/21/99	3	60	30	663		31	< 0.063		< 2.8	< 0.031	0.6	1,389	0.00	0.00	91.0%	
05/28/99	2	50	18			55.0	< 0.063		< 2.8	< 0.031	0.9	1,390	0.00	0.00	94.8%	
06/24/99	1	65	27	747		102	0.021		< 2.8	< 0.031	2.1	1,392	0.00	0.00	97.3%	
07/22/99	6	70	30	682		113	0.342		< 2.40	< 0.00320	2.5	1,406	0.00	0.00	97.9%	
08/31/99	1	70	32	678		218	< 0.0314		< 2.84	< 0.0314	4.9	1,410	0.00	0.00	98.7%	
09/99	0															a
10/07/99	1	70	35	668							4.9	1,410	0.00	0.00	98.7%	b
11/99	0			***												c
12/99	0			-44					***		***				***	c
1/00	0								-							c
2/00	0													•••		c
3/00	0						,									c
4/00	0	-					,									c
5/00	0												***			c
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7/00	. 0		1		e e e e e e e e e e e e e e e e e e e						(, c .
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Table 1. Soil Vapor Extraction System Performance and Summary - Former Shell Service Station, Incident #97088270, 15275 Washington Avenue, San Leandro, California

	Interval	System		_		HYDRO	CARBON (CONCEN	TRATIONS		ТРНд	Cumulative_	EMISSI	ON RATES		
	Days of	Flow	System	Operating		Influent			Effluent		Removal	TPHg	TPHg	Benzene	TPHg	
	Operation	Rate	Vacuum	Temp. 1	OVA	TPHg	Benzene	OVA	TPHg	Benzene	Rate	Removal	Rate	Rate	Destruction	
Date	(days)	(CFM)	("H2O)	(°F)	←		——(p <u>r</u>	omv)——			(#/day)	(#)	(#/day)	(#/day)	Efficiency	Comments

Abbreviations and Notes:

1 = Center oxidizer temperature, inlet temperature set point is 650 degrees F.

CFM = Cubic feet per minute.

ppmv = parts per million by volume.

= pounds.

--- = not analyzed or not measured.

SVE = Soil vapor extraction.

TPHg = Total Petroleum Hydrocarbons as Gasoline (C6-C12), by modified EPA Method 8015.

Benzene by EPA Method 8020.

OVA = Organic vapor analyzer.

TPHg REMOVAL/EMISSION RATE = lab concentration(ppmv) x system flow rate (cfm) x (1lb-mole/386ft3) x molecular weight (86 lb/lb-mole for TPHg, 78 lb/lb-mole for benzene) x 1440 min/day x 1/1,000,000. TOTAL TPHg REMOVAL = Average of the current and previous removal rates multiplied by the day-interval of operation plus the previous total.

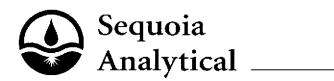
a = System shut down between 9/1/99 and October 7, 1999

b = SVE system lab samples were not picked up by lab courier; no analytical data available

c = System shutdown since October 7, 1999

Attachment A Certified Laboratory Analytical Report





November 02, 2000

Darren Croteau Cambria Environmental - Oakland 1144 65th St., Suite C Oakland, CA 94608 RE: Equiva

Enclosed are the results of analyses for samples received by the laboratory on 10/27/00 17:00. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Richard Stover Project Manager

CA ELAP Certificate Number 2374





1144 65th St., Suite C Oakland CA, 94608 Project: Equiva

Project Number: 15275 Washington Ave., San Leandro

Reported:

Project Manager: Darren Croteau

11/02/00 11:43

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
INF	P010665-01	Air	10/26/00 13:15	10/27/00 17:00





Project: Equiva

1144 65th St., Suite C Oakland CA, 94608 Project Number: 15275 Washington Ave., San Leandro

Project Manager: Darren Croteau

Reported: 11/02/00 11:43

Total Petroleum Hydrocarbons as Gasoline and BTEX by EPA 8015M/8020M Sequoia Analytical - Petaluma

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Note
INF (P010665-01) Air Sampled: 10/20	6/00 13:15 Rece	eived: 10/27/	00 17:00						
Gasoline (ppmv, MW 86.2)	22.7	2.84	ppmv	0.2	0100674	10/28/00	10/28/00	EPA 8015M/8020M	
Benzene (ppmv)	ND	0.0314	11	**	11	*		•	
Toluene (ppmv)	0.116	0.0266	"	•	**	Ħ	**	n	
Ethylbenzene (ppmv)	ND	0.0230	**	**	**	**	*	н	
Xylenes (total) (ppmv)	0.137	0.0230	11	44	11	#	н	"	
Methyl tert-butyl ether (ppmv)	1.04	0.111	11	*	**	"	**	**	
Gasoline	80.1	10.0	ug/l	41	н		ŧŧ	u	
Benzene	ND	0.100	н	11	н	и	"	**	
Toluene	ND	0.100	41	н	н	"	**	**	-
Ethylbenzene	0.329	0.100	И	**	п	"	11	11	
Xylenes (total)	0.593	0.100	11	Н	II	4	10	16	-
Methyl tert-butyl ether	3.73	0.500	н	11	п	"	п	#	-
Surrogate: a,a,a-Trifluorotoluene		106 %	65	135	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		90.0 %	65-	135	"	ø	*	"	





1144 65th St., Suite C Oakland CA, 94608 Project: Equiva

Project Number: 15275 Washington Ave., San Leandro

Project Manager: Darren Croteau

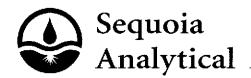
11/02/00 11:43

Reported:

Volatile Organic Compounds by EPA Method 8260B

Sequoia Analytical - Petaluma

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
INF (P010665-01) Air Sampled: 10/2	6/00 13:15 Rece	ived: 10/27/0	00 17:00						
Methyl tert-butyl ether	ND	0.500	ug/I	Į	0100718	10/28/00	10/28/00	EPA 8260B	
Surrogate: Dibromofluoromethane		95.6 %	88-11	8	**	"	"	"	



1144 65th St., Suite C

Oakland CA, 94608

Project: Equiva

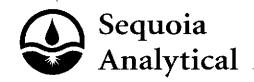
Project Number: 15275 Washington Ave., San Leandro

Project Manager: Darren Croteau

Reported: 11/02/00 11:43

Total Petroleum Hydrocarbons as Gasoline and BTEX by EPA 8015M/8020M - Quality Control Sequoia Analytical - Petaluma

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 0100674 - EPA 5030 waters										
Blank (0100674-BLK1)				Prepared	& Analyze	d: 10/26/	00			
Gasoline	ND	50.0	ug/l							
Benzene	ND	0.500	ø							
Toluene	ND	0.500	II							
Ethylbenzene	ND	0.500	н							
Xylenes (total)	ND	0.500	ıı.							
Methyl tert-butyl ether	ND	2.50	II.							
Surrogate: a,a,a-Trifluorotoluene	319		"	300		106	65-135			
Surrogate: 4-Bromofluorobenzene	273		#	300		91.0	65-135			*
Blank (0100674-BLK2)				Prepared	& Analyze	ed: 10/28/	00			
Gasoline	ND	50.0	ug/l							
Benzene	ND	0.500	п							
Toluene	ND	0.500	и							
Ethylbenzene	ND	0.500	н							
Xylenes (total)	ND	0.500	II							
Methyl tert-butyl ether	ND	2.50	ii.							
Surrogate: a,a,a-Trifluorotoluene	319		#	300		106	65-135			
Surrogate: 4-Bromofluorobenzene	265		"	300		88.3	65-135			
LCS (0100674-BS1)				Prepared .	& Analyze	ed: 10/26/0	00		·	
Gasoline	2270	50.0	ug/l	2750		82.5	65-135			
Benzene	34.4	0.500	11	32.0		108	65-135			
Toluene	175	0.500	II .	193		90.7	65-135			
Ethylbenzene	46.9	0.500	н	46.0		102	65-135			
Xylenes (total)	228	0.500	н	231		98.7	65-135			
Methyl tert-butyl ether	67.0	2.50	11	52.0		129	65-135			
Surrogate: a,a,a-Trifluorotoluene	342		"	300		114	65-135			
Surrogate: 4-Bromofluorobenzene	288		"	300		96.0	65-135			



1144 65th St., Suite C Oakland CA, 94608 Project: Equiva

Project Number: 15275 Washington Ave., San Leandro

Project Manager: Darren Croteau

Reported: 11/02/00 11:43

Total Petroleum Hydrocarbons as Gasoline and BTEX by EPA 8015M/8020M - Quality Control Sequoia Analytical - Petaluma

Anches	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Analyte	Resuit	Limit	Onis		Кезші	ARLC		III D	Linit	110163
Batch 0100674 - EPA 5030 waters		***								
LCS (0100674-BS2)				Prepared	& Analyze	ed: 10/28/	00			
Gasoline	2020	50.0	ug/l	2750		73.5	65-135			
Benzene	32.5	0.500	н	32.0		102	65-135			
Toluene	170	0.500	н	193		88.1	65-135			
Ethylbenzene	45.6	0.500	**	46.0		99.1	65-135			
Xylenes (total)	222	0.500	•	231		96.1	65-135			
Methyl tert-butyl ether	66.6	2.50	•	52.0		128	65-135			
Surrogate: a,a,a-Trifluorotoluene	351		"	300		117	65-135			
Surrogate: 4-Bromofluorobenzene	274		"	300		91.3	65-135			
Matrix Spike (0100674-MS1)	So	urce: P01059	9-03	Prepared	& Analyz		00			-
Gasoline	2580	50.0	ug/l	2750	485	76.2	65-135			•
Benzene	33.7	0.500	11	32.0	ND	105	65-135			
Toluene	172	0.500		193	ND	89.1	65-135			
Ethylbenzene	46.8	0.500	ŧŧ	46.0	2.17	97.0	65-135			
Xylenes (total)	215	0.500	P	231	ND	93.1	65-135			
Methyl tert-butyl ether	68.4	2.50	"	52.0	5.81	120	65-135			
Surrogate: a,a,a-Trifluorotoluene	324		"	300		108	65-135			
Surrogate: 4-Bromofluorobenzene	277		"	300		92.3	65-135			
Matrix Spike Dup (0100674-MSD1)	So	urce: P01059	9-03	Prepared	& Analyz	ed: 10/26/	00			
Gasoline	2740	50.0	ug/l	2750	485	82.0	65-135	6.02	20	
Benzene	33.8	0.500	**	32.0	ND	106	65-135	0.296	20	
Toluene	171	0.500	n	193	ND	88.6	65-135	0.583	20	
Ethylbenzene	47.4	0.500	п	46.0	2.17	98.3	65-135	1.27	20	
Xylenes (total)	216	0.500	**	231	ND	93.5	65-135	0.464	20	
Methyl tert-butyl ether	71.6	2.50	"	52.0	5.81	127	65-135	4.57	20	
Surrogate: a,a,a-Trifluorotoluene	305		"	300		102	65-135			
Surrogate: 4-Bromofluorobenzene	278		**	300		92.7	65-135			





1144 65th St., Suite C Oakland CA, 94608

Project: Equiva

Project Number: 15275 Washington Ave., San Leandro

Reported:

Project Manager: Darren Croteau

11/02/00 11:43

Volatile Organic Compounds by EPA Method 8260B - Quality Control Sequoia Analytical - Petaluma

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 0100718 - EPA 5030 waters										
Blank (0100718-BLK1)				Prepared	& Analyze	d: 10/28/	00			17/7
Methyl tert-butyl ether	ND	0.500	ug/l							
Surrogate: Dibromofluoromethane	4.58		"	5.00		91.6	88-118			
LCS (0100718-BS1)				Prepared	& Analyze	d: 10/28/	00			
Methyl tert-butyl ether	4.34	0.500	ug/l	5.00		86.8	79-118			
Surrogate: Dibromofluoromethane	4.72		"	5.00	,_ _ ,	94.4	88-118			
Matrix Spike (0100718-MS1)	Soi	arce: P01051	8-01	Prepared	& Analyzo	ed: 10/28/	00			
Methyl tert-butyl ether	4.71	0.500	ug/l	5.00	ND	94.2	79-118			
Surrogate: Dibromofluoromethane	4.70		n	5.00	V.*	94.0	88-118			
Matrix Spike Dup (0100718-MSD1)	latrix Spike Dup (0100718-MSD1) Source: P0						00			
Methyl tert-butyl ether	4.69	0.500	ug/i	5.00	ND	93.8	79-118	0.426	20	_
Surrogate: Dibromofluoromethane	4.86		"	5.00		97.2	88-118			





1144 65th St., Suite C Oakland CA, 94608 Project: Equiva

Project Number: 15275 Washington Ave., San Leandro

Project Manager: Darren Croteau

Reported:

11/02/00 11:43

Notes and Definitions

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

Sequoia Analytical - Petaluma

SEQUIOA LABORATORIES				E	JU	IVA	\S	erv	/ice	es	LL	CC	ha	ıln	Of	Cι	ist				orc			
	Equiva Pr	oject	Manag	jer (1	o b	e inv	oice	ed):				DEN	T NL	JMBE	R (S	ķΕ)		DΛ	тс.	,	10.		26	(-00
	Science & Engineerin	g (S&E)	X	lΚ	$\alpha \cap$	en	Pe	Try	yna	9	7	0	9	3	41	1	a	, DA	·	1			-	
	Technical Services	(TS)						4	_	SA	P or (CRM	T NU	MBEI	TS.	/CRN	IT)	_						
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LAB USE Field Sample Identification	SAMPLING	MAT-	ļ	- -	- Ex	BTEX / MTBE (8021B)	BTEX / MTBE + Oxygenates (8260B	VOCs Full List + Oxygenates	MTBE (8260B) Confirmation,	EPA 5035 Extraction for Volatiles	Ss Ha	Ethanol, Methanol (8015B)	Metals (Specify)	TRPH (418.1)	Vapor VOCs	/apor VOCs		O FB	₫					
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