

CONDOR EARTH TECHNOLOGIES INC.

. August 4, 1997 21663 Brian Lane P.O. Box 3905 Sonora, CA 95370 (209) 532-0361 FAX (209) 532-0773

Mr. Frank Salel Salel Enterprises 573 S. Sheperd Street Sonora, CA 95370

Dear Mr. Salei.

I have received the corrective action plan (CAP) prepared by enviros and the risk based corrective action (RBCA) analysis prepared by Weiss Associates. The historical review of the work done at the site is thorough and indicates that the site has had more than adequate study. Enviros has proposed a soil vapor extraction system to remove benzene vapors from shallow sandy fill near surface and sands encountered between about 4 to 6 inches below surface.

Subsurface deposits are predominately bay muds composed of clay and silty clay with stringers of sand intersected in several of the bore holes. Based on my drilling experience in the east bay, these are probably tidal-flat deposits and the sands are bar and thalweg deposits in meander stream channels crossing the flats. These sands can be highly permeable but are not always continuous in the stream channels. Overlying the bay muds in the vicinity of former tank location, the building and a portion of the trailer court is an area of fill that is probably relatively permeable. The clays and silty clays, the bulk of the deposits, would have very low permeability.

Enviros is proposing a vapor extraction system to remove benzene vapors, primarily, from the permeable sandy fill and the sand stringers. Whether the system will be efficient for reducing benzene in the muds and in groundwater is open to question. Buried utilities may be pathways that are as important as the fill and the sands. Over excavation of the tank pits was halted because a sewer line prevented further excavation.

Noteworthy is that the gasoline additive MTBE (methyl tertiary butyl ether) was detected in the soil gas survey conducted by Wiess Associates. The subject service station was closed before MTBE was added to the firels. This means that MTBE vapors have found a pathway from the service station across the street to the subject site or other off-site source. MTBE also has been detected in the groundwater in wells S-12 and S-13 located in the center divide of the street between the two stations and at well SR-1 located in the

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original tank site. MTBE was not considered in the risk assessment because there are no health risk data available.

It is likely that voc vapors (benzene) can be removed from the shallow fill using vapor extraction and depending on how "connected" the sand stringers are, the vapor concentrations can be reduced in the sands. I am not confident that a vapor extraction system will have much effect with the groundwater in the clays. Of concern is that the vapor extraction system will pull benzene and MTBE from the site across the street by the sand and buried utility pathways.

Condor recommends that Salel Enterprises not initiate vapor extraction, without monitoring soil vapor in such a way as to detect transport of vapors onto the site through utility trenches or sands. This will minimize exposure to long-term responsibility for off-site contamination.

If you have technical questions regarding this review and recommendation, please call myself or John Kramer.

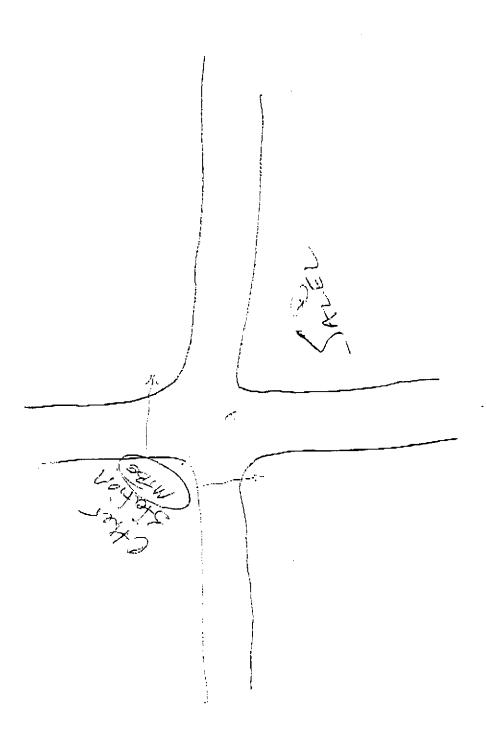
Sincerely,

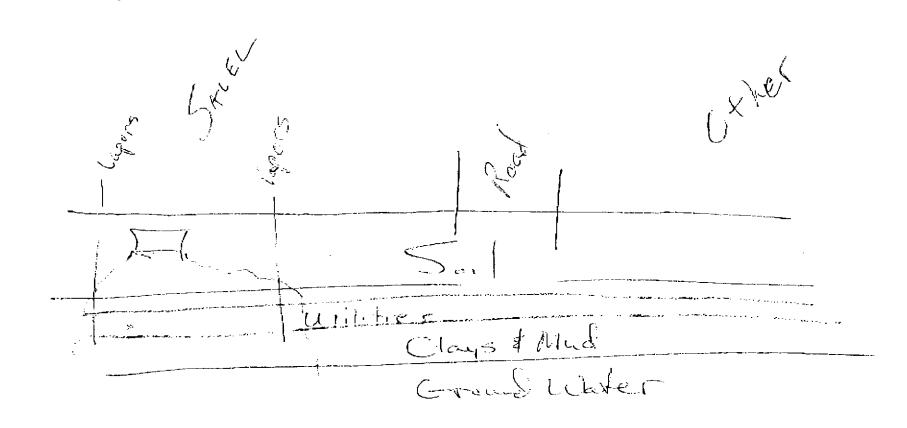
Donald T. Bishop

Principal Geologist

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