

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01107

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 2, 1993
STID 3161

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Barbara and Louis Arrighi
L&B Arrighi Investments
20 Summit Lane
Novato CA 94945

RE: Kalmar AC site
2792 Cypress ST.
Oakland CA 94607

Dear Mrs. and Mr. Arrighi,

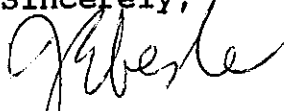
We are in receipt of a letter report re groundwater sampling for the above referenced site, prepared by Dennis Bates Associates (DBA), dated 9/16/93. A number of questions have arisen upon review of this report:

- 1) The waste oil tank is situated directly upgradient of the monitoring wells. Waste oil constituents were detected in MW3 this quarter (TPHd, TPHg, TRPH, and BTEX). This tank is a likely source of groundwater contamination. The last tank integrity test on file is dated February 1989. This appears to be the last time this tank was tested. DBA's contention that the earthquake of October 1989 may have caused changes in the subsurface is well taken, especially since this tank may have been affected by the earthquake. Therefore, **YOU are requested to submit results for tank integrity testing within 30 days or by January 2, 1994.** The regulatory authority for this request is the California Code of Regulations, Title 23, Division 3, Chapter 16, Section 2724.
- 2) The concentration of benzene in MW3 sampled on 6/18/93 is 240 ppb, not 244 ppb. See Table 1, Table 3, page 2 and page 3.
- 3) The concentrations for TPHd and TRPH in MW3 for 6/93 were reversed. See Table 3.
- 4) The concentrations for MW3 were reversed for 12/92 and 5/92. See Table 3.
- 5) The recommendation to review the site status relative to application for closure is not appropriate at this time. Petroleum hydrocarbons are still present in groundwater, most notably benzene at a concentration of 240 ppb (MW3). In addition, upgradient sources of contamination must be investigated, as per item #1. Therefore, quarterly sampling must continue, with the next quarterly report due to this office **within 45 days or by January 17, 1994.**

Barbara and Louis Arrighi
STID 3161
page 2 of 2
December 2, 1993

Please contact me at least 3 business days in advance of the next groundwater sampling event. If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Dennis Bates Associates, 494 Alvarado St., Suite B,
Monterey CA 93940
Rich Hiett, RWQCB
Ed Howell/file
Don Hwang, AlCo Haz Mat
George Negrette, Kalmar AC, 2792 Cypress St., Oakland
CA 94607

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

R01107

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 14, 1993
STID 3161

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Barbara and Louis Arrighi
L&B Arrighi Investments
20 Summit Lane
Novato CA 94945

re: Kalmar AC site
2792 Cypress St.
Oakland CA 94607

Dear Mrs. & Mr. Arrighi,

We are in receipt of a letter from Barbara Arrighi dated 5/1/93 accompanied by the following documents:

- A) letter from DBA to Alameda County (AlCo) dated 4/30/93, which responds to my letter of 3/26/93
- B) letter report from DBA to Alameda County (AlCo) dated 4/30/93, which documents groundwater sampled in December 1992
- C) letter report from DBA to Alameda County (AlCo) dated 4/30/93, which documents groundwater sampled in March 1993

I would like to comment on these documents in the same order listed. Document A mentions that the correct date of tank removal was June 26, 1989. Our files contain several documents referring to a tank removal date of January 26, 1989. Perhaps we could meet and share our files with one another to clarify this item.

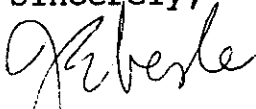
Document B documents groundwater sampled in December 1992. This document indicates that groundwater flows in a southwest direction "based on the present data," when in fact the data is taken from 1/8/90. I hesitate to use data from nearly 3 years previous to judge current groundwater flow direction. My reason is that this area of Oakland is known to have been built on fill and have variable groundwater flow directions. Please note a typographical error on page 3, Table 1. The units for all analytes in this table should read ppm, not ppb. Also note a typographical error on page 5, 5th paragraph, which states "waste oil was detected in . . . (MW3) at 20 ppm." This should read MW1.

Barbara and Louis Arrighi
STID 3161
May 14, 1993
page 2 of 2

Document C reports results from groundwater sampled in March 1993. This document indicates that "MW2 has been rehabilitated and should now be suitable to function as a groundwater monitoring well." The next quarterly event is scheduled for June 1993, and should include all 3 wells; TPH as waste oil will be added to the sampling matrix. For ease of reference in future reports, historic and current sampling results should be indicated in the same units throughout the table.

Please contact me at least 3 business days in advance of the next groundwater sampling event. If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Dennis Bates Associates, 494 Alvarado St., Suite B,
Monterey CA 93940
Rich Hiatt, RWQCB
Ed Howell/file

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Roll 07

Certified Mailer # P 367 604 549
March 26, 1993
STID 3161

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Louis Arrighi
L&B Arrighi Investments
20 Summit Lane
Novato CA 94945

re: Kalmar AC
2792 Cypress St.
Oakland CA 94607

Dear Mr. Arrighi,

As you are probably aware, a 1,000-gallon underground storage tank (UST) was removed from the above-referenced site on 1/26/89. The tank was found to contain holes and was corroded. Soil sampled from the tank excavation contained up to 240 parts per million (ppm) TPH-diesel, 30 ppm TPH-gasoline, and 2.8 ppm benzene.

We are in receipt of a "Report on Subsurface Investigation and Remediation of Contaminated Soil," dated 3/8/90, prepared by Miller Environmental Company (MEC). This report documents the overexcavation of the tank pit on 10/9/89. Confirmatory soil sampling revealed non-detectable concentrations of TPH-g and TPH-d in the tank pit; however, 5.5 ppm benzene remained in the tank pit.

The 3/8/90 MEC report also documents the installation of three groundwater monitoring wells in December 1989 to determine the impact to groundwater. Groundwater analyzed from these wells on 12/6/89 had low levels of TPH-d and TPH-g and non-detectable levels of benzene; however, 10,000 parts per billion (ppb) of waste oil were detected in MW2. Waste oil was also detected in soil sampled from all three well boreholes at concentrations of up to 2,900 ppm. **The chain of custody form was not submitted with this report.** The waste oil issue was discussed in this report; however, its source remains unknown. Please submit the chain of custody form for the 3/8/90 MEC report **within 30 days or by April 26, 1993.**

The 3/8/90 MEC report also discussed the removal of one waste oil storage tank (page 11). Please indicate on a site map from what location this tank was removed, and when it was removed. There is also mention of an existing 550-gallon waste oil tank (page 11), which I assume is indicated on Figure 2. Please indicate whether this is the situation.

Louis Arrighi
STIDd 3161
March 26, 1993
Page 2 of 3

Upon a review of our files, it appears that the last tank tightness test conducted was in 1989. These tests are required annually, as per Section 2643 (c) of Article 4 of Title 23 of the California Code of Regulations. Therefore, we request that you submit the results for tank tightness tests conducted within the past 12 months for **all** underground storage tanks located at your facility. In addition, we request that you submit tank gauging records for the time period prior to 1/1/93. These records were previously requested by Don Hwang of this office during his inspection on 8/17/92. Please indicate the type of tank monitoring method currently in use. Current acceptable methods include statistical inventory reconciliation (SIR) or automatic tank gauging, as per Article 4 of Title 23 of the California Code of Regulations. We also request updated information for any and all USTs at your facility; please complete the enclosed Forms A and B. Please submit all of these documents **within 45 days or by May 11, 1993.**

We are also in receipt of a letter report from MEC dated 6/5/92. Groundwater was sampled on 5/12/92 from MW1 and MW3. MW2 was not analyzed because it was damaged. Higher levels of TPH-g and TPH-d were found in the two wells. In addition, significant levels of benzene were detected (up to 73 ppb) in both wells for the first time. Total Oil & Grease was not detected. Groundwater flow direction could not be determined due to the damaged well.

This report is the latest in our files. It is possible that subsequent work has been done at this site. If it has not already been so done, we request that MW2 be repaired or replaced, and the quarterly monitoring program be reestablished at this site **within 45 days or by May 11, 1993.** Case closure may be recommended after four consecutive quarters of non-detectable concentrations of contaminants. Please contact me yourself to indicate who your consultant currently is, or have your consultant contact me directly **within 30 days or by April 26, 1993** so that we may discuss this case further.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.** All reports and documents pertaining to this investigation should also be sent to:

Louis Arrighi
STIDD 3161
March 26, 1993
Page 3 of 3

Rich Hiatt
San Francisco Bay Region
Regional Water Quality Control Board
2101 Webster St., Ste 500
Oakland CA 94612

Please submit a cover letter with your consultant's reports.
If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Rich Hiatt, RWQCB
Ed Howell/File
Don Hwang

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SITE: 2792 mandela Pkwy.

R01107

Certified Mailer #: P062 128 09 2

September 22, 1989

Barbara Arrighi
c/o Arrighi's Custom Pools Inc.
20 Sommit Lane
Novato, CA 94945

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Subject: Review of Workplan for Subsurface Investigation and
Remediation of Contaminated Soil at 2792 Cypress Street in
Oakland, California

Dear Barbara Arrighi:

We have received and reviewed the Workplan for Subsurface
Investigation and Remediation of Contaminated Soil for Kalmar AC
located at 2792 Cypress Street in Oakland. This plan was prepared
by Miller Environmental Company and dated September 9, 1989.

This plan is acceptable to us and may be carried out. We
recommend, however, that at least two verification samples, rather
than one, be collected from the tank pit for analysis (see page 5,
Workplan, Miller Environmental Company, September 5, 1989).

Should you have any questions, please contact Katherine Chesick,
Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edgar B. Howell" or similar, written over the typed name.

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Bob Rohlfs, Kalmar AC
Jeffrey R. Caton, Miller Environmental Company
Lester Feldman, Regional Water Quality Control Board
Howard Hatayama, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SITE: 2792 Mandela Pkwy

RO1107

Certified Mailer #: P 833 981 491

July 24, 1989

Mr. Bob Rohlfis
c/o Kalmar A. C.
2792 Cypress Street
Oakland, California 94607

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Subject: Initial Subsurface Investigation of Underground Storage
Tank Related Contamination at 2792 Cypress Street in
Oakland, California, 94607

Dear Mr. Rohlfis:

We have received and reviewed the following letter reports concerning the the removal of a 1,000 gallon steel underground gasoline storage tank on January 26, 1989 from 2792 Cypress Street in Oakland; the tank had reportedly failed its precision test:

- * Letter report dated February 24, 1989, prepared by Robert J. Miller Co., Inc.
- * Letter report dated May 3, 1989, prepared by Robert J. Miller Co., Inc.

The reports reveal soil samples collected beneath the tank contained up to 30 ppm gasoline, 240 ppm diesel, 2.8 ppm benzene, 690 ppb toluene, 130 ppb ethyl benzene and 810 ppb xylenes. Ms. Katherine Chesick, Hazardous Materials Specialist with this Division, witnessed the tank removal and detected strong gasoline odors emanating from the excavation during tank removal. She also noted the tank was wrapped with tar paper and that there were corrosion holes where the tank ends were welded to its body.

The reports also indicate additional material was removed from the excavation area ("approximately three feet") and an additional sample was collected. This soil sample contained less than 3 ppm diesel. As of May 3, 1989 the excavated material was being aerated.

The above conditions require performance of a subsurface investigation to assess contamination. Our office will be the lead agency overseeing the investigation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of underground tank cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's investigation requirements.

Page 2 of 5
Mr. Bob Rohlfs
Kalmar A. C.
July 24, 1989

To assess site contamination, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this work plan within 45 days of the date of this letter.

All work must be performed according to the Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, 2 June 1988 (2 June 1988 RWQCB document) and the Guidelines for Addressing Fuel Leaks, September 1985 (September 1985 RWQCB document). Copies of these documents can be obtained by calling the RWQCB data management group at 464-1269. Please note the 2 June 1988 RWQCB document supercedes the September 1985 RWQCB document where the two documents differ.

Items to Address:

1. Site history.

- A. This shall include historic site use and ownership information, a description of the types and locations of any hazardous materials used on site, and a description of any known hazardous materials spills, leaks or accidents.
- B. For each existing and former underground tank on site, include the following information:
 - a) the date of tank installation
 - b) the tank capacity and construction material
 - c) the types of materials stored in the tank
 - d) the dates the tank was used
 - e) a discussion of tank inventory reconciliation/monitoring methods and results
 - f) tank testing dates and results
 - g) estimate of quantity of product lost, if applicable
 - h) a map showing the location and depth of all soil samples collected during and after tank removal

2. Site Description.

This shall incorporate the following information:

- A. A map which shows streets, site buildings, underground tank locations, tank islands and pipings, subsurface conduits and utilities, on-site and nearby wells, and nearby streams or water bodies.
- B. A description of the hydrogeologic setting of the site and surrounding area. Include a description of any subsurface work previously done at the site or on adjacent sites.

Page 3 of 5
Mr. Bob Rohlf's
Kalmar A. C.
July 24, 1989

3. Determination of Water Quality.

Due to the potential that gasoline or diesel may have contaminated the ground water, water quality must be characterized.

- A. A minimum of three monitoring wells must be installed to determine the ground water gradient. One monitoring well must be installed within 10 feet of the tank in the down gradient direction. If the verified down gradient location has been established, then a complete description of the gradient rationale must be submitted and only one monitoring well will need to be installed; this well must be within 10 feet of the tank in the verified down gradient direction.
- B. Monitoring wells shall be designed and constructed to be consistent with the September 1985 RWQCB document and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based on particle analysis (ASTM D-422) from each stratigraphic unit in at least one boring on the site and on the types of groundwater contaminant present. Wells shall be surveyed to mean sea level (MSL) to an established benchmark to 0.01 foot.

For logging and analytical purposes, undisturbed soil samples are to be collected at a minimum of every five feet in the unsaturated zone and at any changes in lithology during drilling of all boreholes and monitoring wells. Borings and wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. Logs shall include observed soil odors; blow counts shall be expressed in blows per 6 inches of drive.

- C. Monitoring wells must be sampled. Water level and free product thickness measurements shall be made in all wells before any sampling is begun. Measurement of free product must be done by an optical probe or other method having equal accuracy.
- D. Soil and ground water samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents (see Table 2, 2 June 1988 RWQCB document, attached).

Page 4 of 5
Mr. Bob Rohlfs
Kalmar A. C.
July 24, 1989

4. Sampling and remediation or disposal of stockpiled fill and soil.

Documentation concerning the sampling, remediation, and handling/disposal of the excavated soil must be submitted. Any stockpiled soil remaining on site must be sampled and either disposed of or remediated. The number of samples collected from the stockpile(s) must be adequate to characterize the soil for the soil handling method.

5. Reporting.

A. A technical report must be submitted which presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items:

- * boring and well construction logs
- * records of field observations and data
- * chain-of-custody forms
- * water level data
- * water level contour map showing ground water gradient direction
- * tabulations of soil and groundwater contaminant concentrations
- * laboratory-originated analytical results for all samples collected
- * copies of TSDF to Generator manifests for any hazardous wastes hauled off site
- * any recommendations for additional investigative or remedial work

B. The technical report should be submitted with a cover letter from Kalmar A. C. The letter must be signed by a principal executive officer or by an authorized representative of that person.

C. We wish to draw your attention to the following requirements set forth in the 2 June 1988 RWQCB document:

All reports and proposals must be signed by a California-Certified Engineering Geologist, California-Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications [and registration number] for each lead professional should be included in all workplans and reports. Initial tank removal and soil sampling do not require such expertise; however, borehole and monitoring well installations and logging, and impact assessments do require such a professional.

Page 5 of 5
Mr. Bob Rohlfs
Kalmar A. C.
July 24, 1989

6. Site Safety Plan.

All proposals, reports and analytical results pertaining to this investigation must be sent to our office and to:

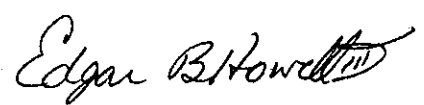
Scott Hugenberger
Toxics Cleanup, Underground Tank Section
Regional Water Quality Control Board
1111 Jackson Street
Oakland, California 94607
(415) 464-1255

You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response will result in referral of this case to the RWQCB for enforcement and may subject Kalmar A. C. to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day. Any extensions of agreed-upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

To cover our costs for remediation review, please submit a check, payable to Alameda County, for \$500.

Should you have any questions concerning this letter, please contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Bar

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Louis Arrighi, Kalmar A. C.
Jeff Deakin, Robert J. Miller Co., Inc.
Scott Hugenberger, Regional Water Quality Control Board
Howard Hatayama, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files

attachment

TABLE #2
REVISED 6 OCTOBER 1988

RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR
UNDERGROUND TANK LEAKS

<u>HYDROCARBON LEAK</u>	<u>SOIL ANALYSIS</u>		<u>WATER ANALYSIS</u>	
<u>Unknown Fuel</u>	TPH G TPH D BTX&E	GCFID(5030) GCFID(3550) 8020 or 8240	TPH G TPH D BTX&E	GCFID(5030) GCFID(3510) 602 or 624
<u>Leaded Gas</u>	TPH G BTX&E ---Optional--- TEL EDB	GCFID(5030) 8020 or 8240 DHS-LUFT DHS-AB1803	TPH G BTX&E TEL EDB	GCFID(5030) 602 or 624 DHS-LUFT DHS-AB1803
<u>Unleaded Gas</u>	TPH G BTX&E	GCFID(5030) 8020 or 8240	TPH G BTX&E	GCFID(5030) 602 or 624
<u>Diesel</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Jet Fuel</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Kerosene</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Fuel Oil</u>	TPH D BTX&E	GCFID (3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Chlorinated Solvents</u>	CL HC BTX&E	8010 or 8240 8020 or 8240	CL HC BTX&E	601 or 624 602 or 624
<u>Non Chlorinated Solvents</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Waste Oil or Unknown</u>	TPH G TPH D O & G BTX&E CL HC	GCFID(5030) GCFID(3550) 503D&E 8020 or 8240 8010 or 8240	TPH G TPH D O & G BTX&E CL HC	GCFID(5030) GCFID(3510) 503A&E 602 or 624 601 or 624

---If any of the above detected, include:---

ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn
METHOD 8270 FOR SOIL OR WATER TO DETECT:
PCB
PCP
PNA
CREOSOTE
PCB
PCP
PNA
CREOSOTE

Reference: Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, 2 June 1988, SF Bay RWQCB

2 June 1988

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GC FID with a fused capillary column and prepared by EPA method 5030 for volatile hydrocarbons, or extracted by sonication using 3550 methodology for extractible hydrocarbons.

TETRAETHYLLEAD (TEL) may be analyzed as total lead. However, a confirming analysis must be completed using a soil sample at the same soil depth in another borehole, or for water, from an upgradient well that is not contaminated with hydrocarbons.

CHLORINATED HYDROCARBONS (CL HC) and BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020, respectively, (or 8240) and for water 601 and 602, respectively, (or 624).

OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used.

Notes:

- To avoid false positive detection of benzene, benzene-free solvents are to be used. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
- For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
- For all analyses on Table #2, appropriate standards are to be used for the material stored in the tank. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
- Other methodologies are continually being developed (such as cryogenic focusing), and as they are accepted by EPA or DHS, they also can be used.