



**JAMES RIVER CORPORATION**  
FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT  
2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

90 NOV 21 PM 1:02

November 19, 1990

Mr. Larry Seto  
Alameda County Health Agency  
Division of Hazardous Materials  
80 Swan Way, Room 200  
Oakland, California 94621

Dear Larry,

Per our telecon of 11/19, enclosed please find the information on the ground water sampling performed on Southern Pacific and James River properties.

I'll call to discuss next week.

Sincerely,

*Bob Wenning*  
Bob Wenning  
Engr. Manager

BW/gd  
1119-302(V)

Enclosure

**ATTACHMENT A**

**WESTERN GEO-ENGINEERS REPORT**



**JAMES RIVER CORPORATION**

FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT

2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

September 18, 1990

Mr. Larry Seto  
Alameda County Health Agency  
Division of Hazardous Materials  
80 Swan Way, Rm. 200  
Oakland, California 94621

Mr. Lester Feldman  
California Regional Water  
Quality Control Board  
San Francisco Bay Region  
1800 Harrison Street  
7th Floor  
Oakland, California 94607

SUBJECT: James River Corporation Flexible Packaging Plant,  
2101 Williams Street, San Leandro, California

Dear Mssrs. Seto and Feldman:

James River Corporation, with the approval of Alameda County Health Agency (County) has been performing groundwater monitoring and tank and pipeline removal activities at our San Leandro facility. Past activities are documented in correspondence between myself and Mr. Seto, and in reports and work plans prepared by Brown and Caldwell Consultants (BCC) from 1989 to the present. Prior to 1989, work related to the tank removal and groundwater monitoring was performed by Harding Lawson Associates.

The plant is located at 2101 Williams Street, as shown on Figure 1. Nine monitoring wells were installed between 1984 to 1986. Water level measurements have consistently indicated a southwesterly groundwater flow direction during the period 1984 to 1990. A tidal study performed by BCC from November 13 through 17, 1989 indicated that tidal action in San Francisco Bay does not affect groundwater flow at the site. Groundwater analytical results indicate that the chlorinated hydrocarbons trichloroethene (TCE), tetrachloroethene or perchloroethene (PCE), dichloroethene (DCE), as well as acetone, toluene, and vinyl chloride are present in the shallow groundwater underneath the James River site. Results also indicate that the highest levels are present in wells located along the northwestern (up-gradient) property boundary (wells W4 and W5). Because we do not use any of the chlorinated solvents found, we were suspicious that the chlorinated solvents were coming from off-site sources.

Ltr. L. Seto & L. Feldman  
September 18, 1990  
Page 2 of 2

Work recently undertaken at the site by BCC included sampling and analysis of groundwater in areas hydraulically up-gradient of our site. The up-gradient survey indicates that the chlorinated hydrocarbons TCE, DCE, and PCE are present in shallow groundwater beneath areas located hydraulically up-gradient of the James River site. A copy of BCC's report of the up-gradient investigation is included as Attachment A to this letter.

*What is the address of these 3 sites?*

At our request, BCC conducted a records review of files located at the San Francisco Bay Regional Water Quality Control Board (Board) office in Oakland, California. This records review identified 3 sites within a mile of the James River site at which chlorinated hydrocarbons have previously been identified in the shallow groundwater (Figure 2).

The findings of the up-gradient groundwater survey, the fact that the highest levels are present in wells located along the up-gradient property boundary and the fact that these chlorinated solvents have never been used on the site, point to an up-gradient source of chlorinated hydrocarbons. Thus, we request that the Board investigate past usage of chlorinated hydrocarbons at properties located hydraulically up-gradient of the James River site.

Sincerely,

JAMES RIVER CORPORATION

*Bob Wenning*  
Bob Wenning  
Engineering Manger

BW/gd

0910-207(S)

Attachments

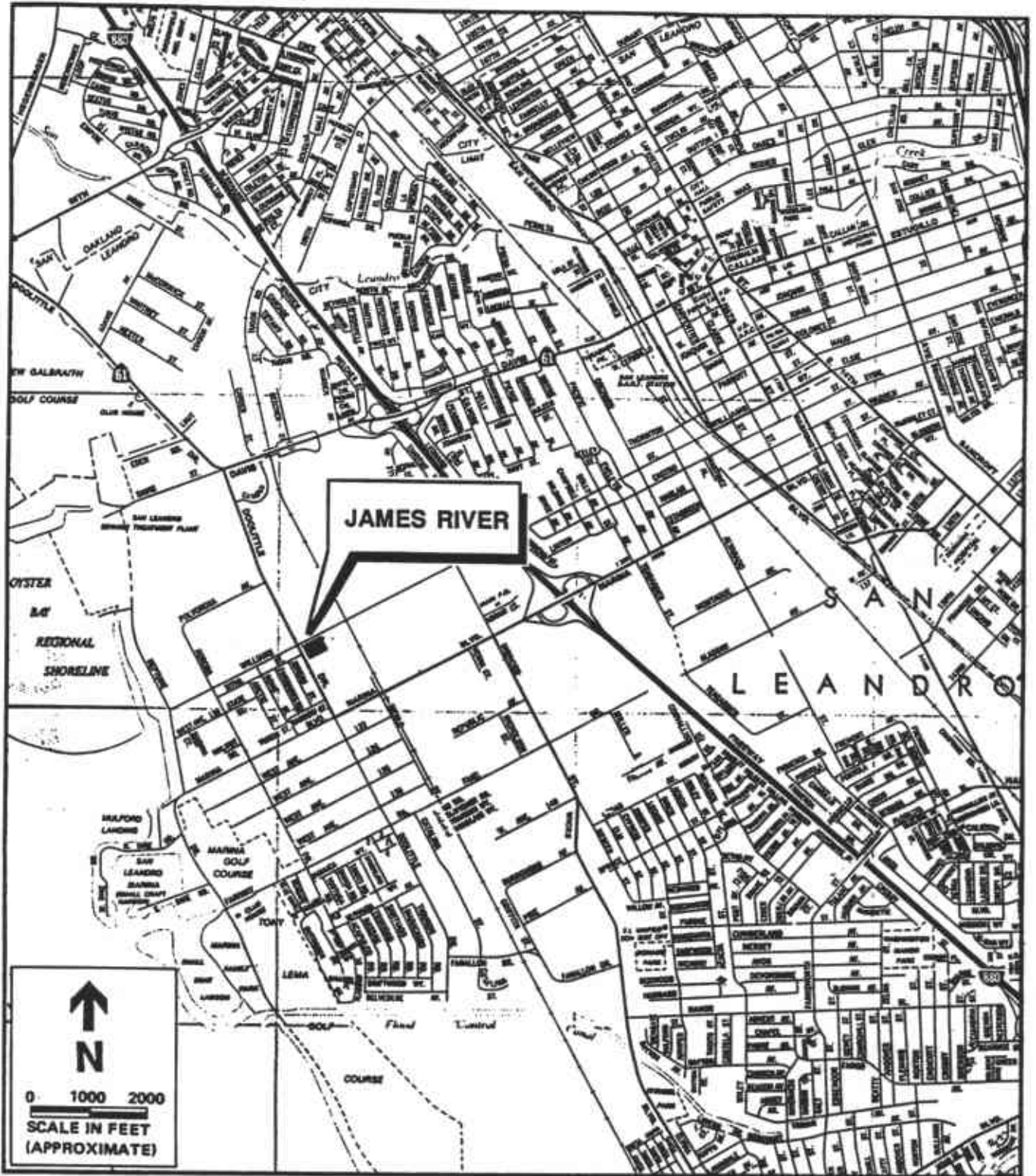


Figure 1 Site Location

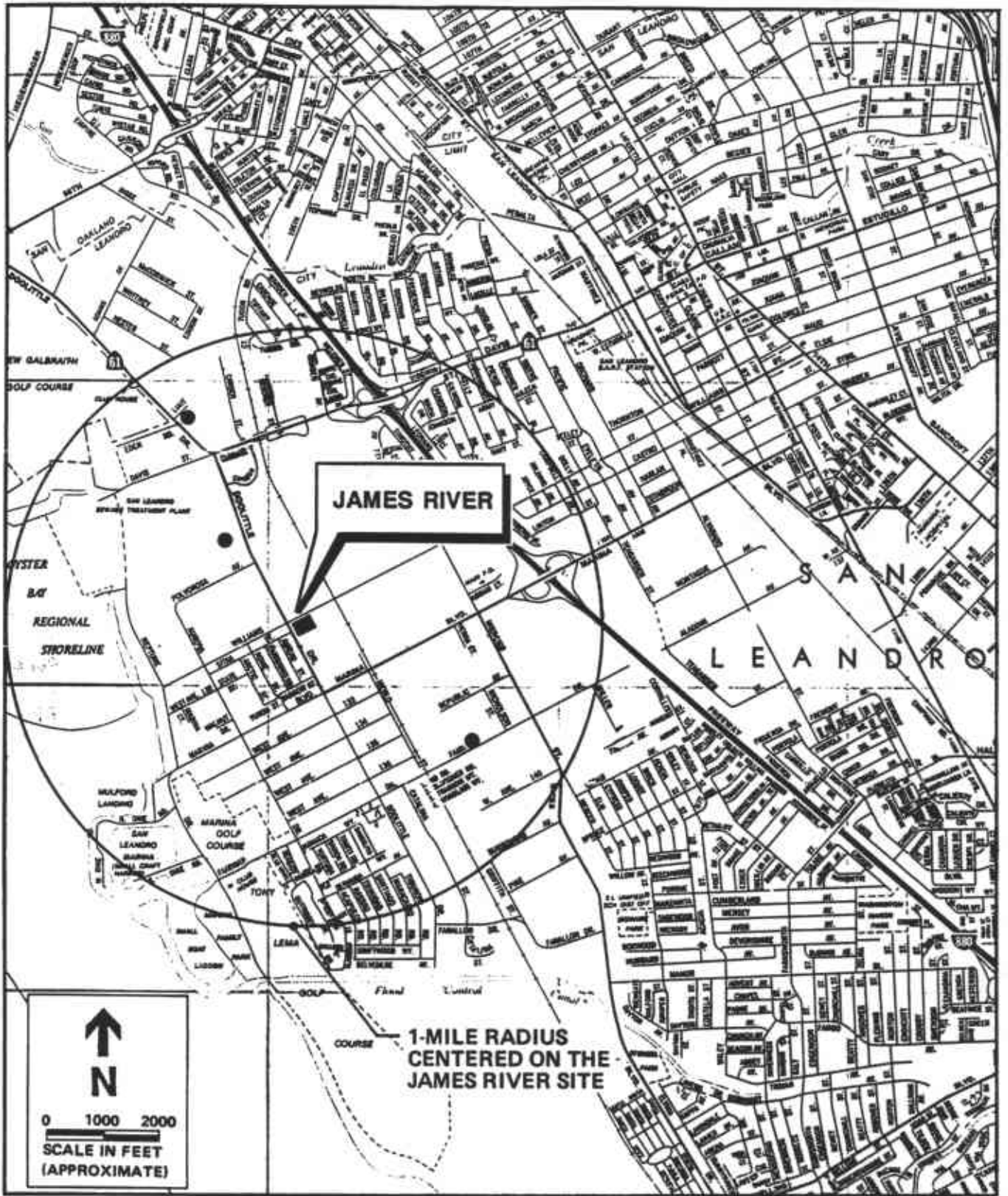
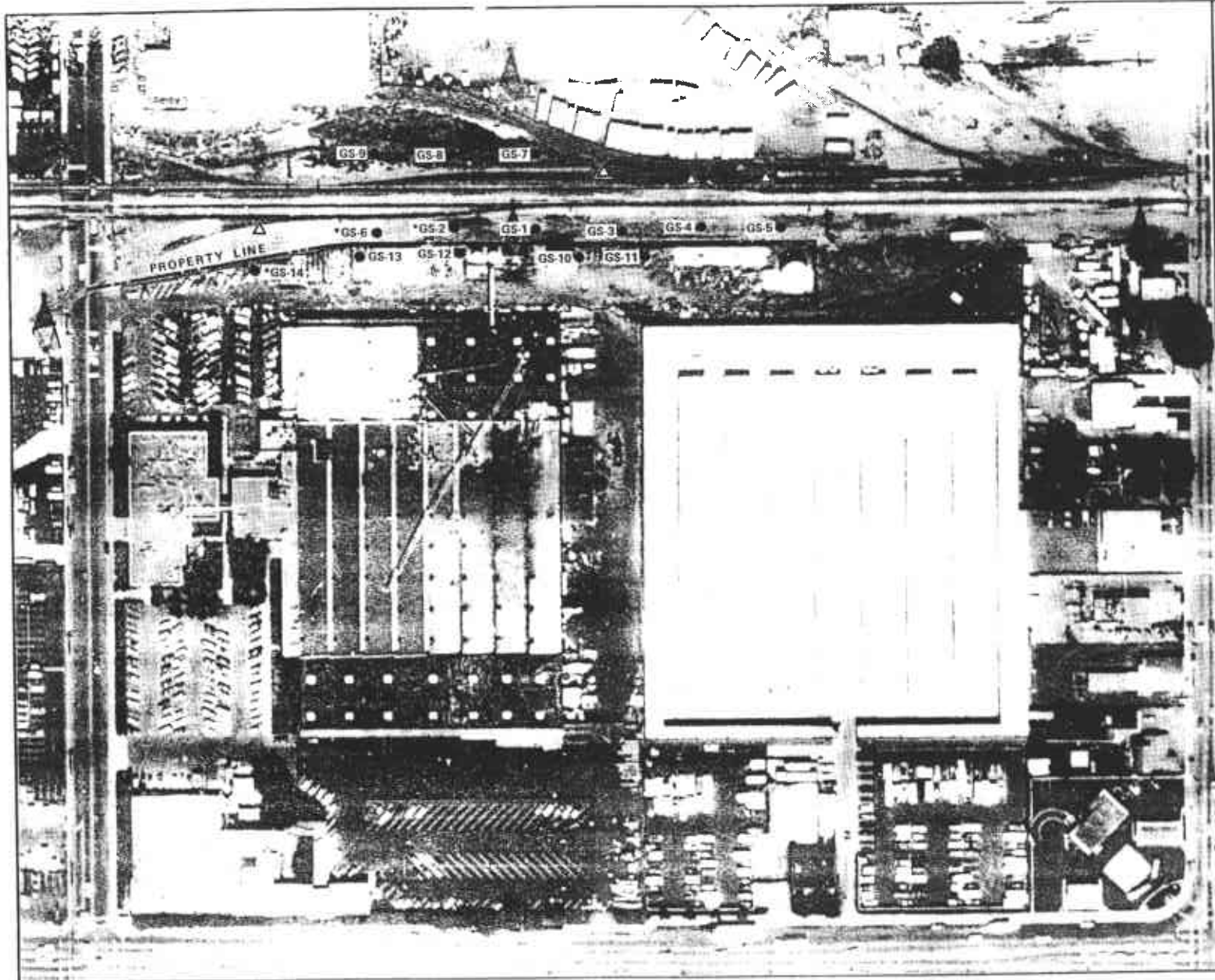


Figure 2 Sites in Vicinity Listed in North Bay Toxics Files



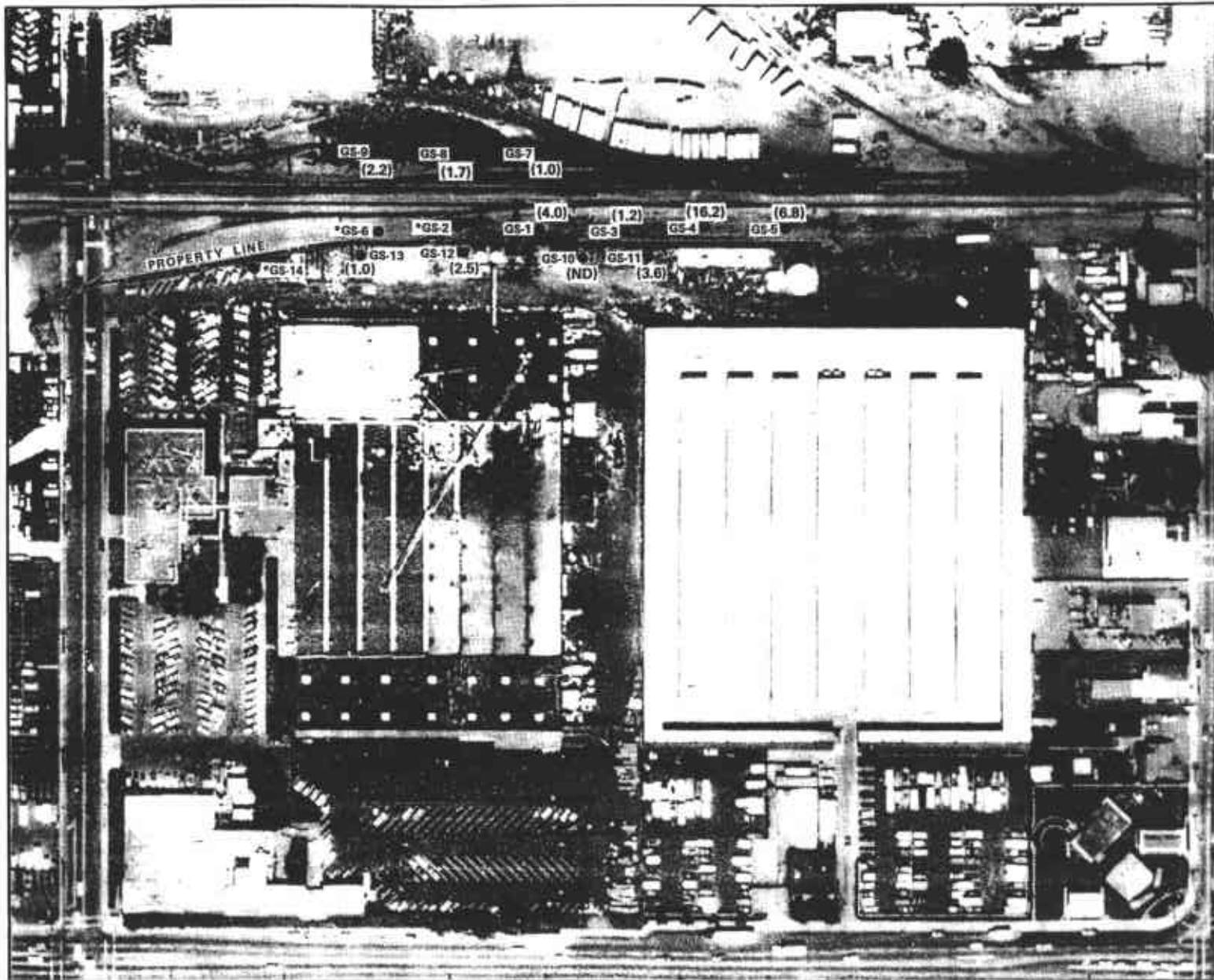
0 50 100  
 SCALE IN FEET  
 (APPROXIMATE)

**LEGEND:**

- GROUNDWATER SURVEY SAMPLING
- △ INACCESSIBLE SAMPLING LOCATION

**COPY**

Figure 1 Groundwater Survey Sampling Locations, James River Flexible Packaging Plant, San Leandro, California



0 50 100  
SCALE IN FEET  
(APPROXIMATE)

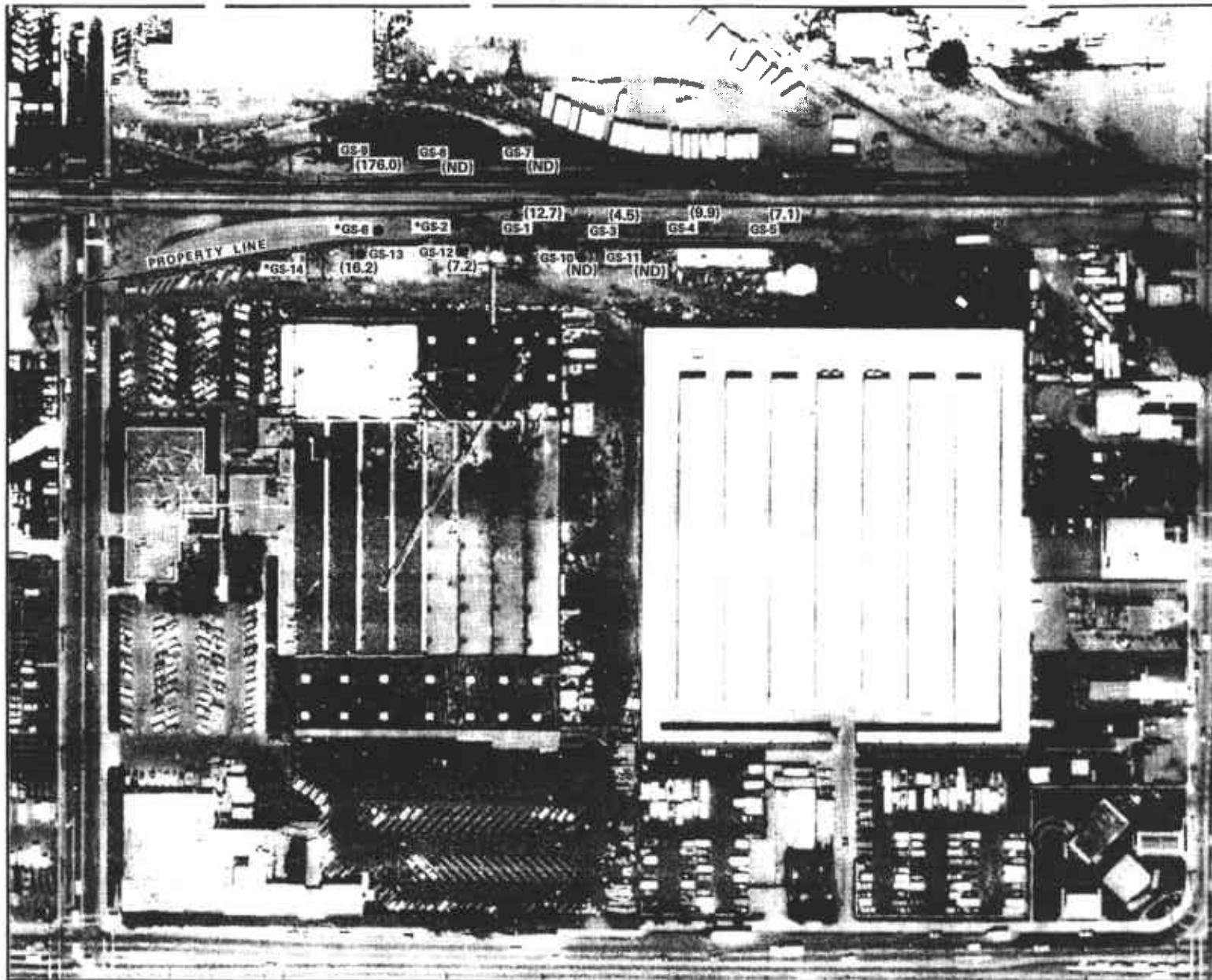
**LEGEND**

- (4.0) RESULT OF PID ANALYSIS OF HEADSPACE SAMPLE, parts per billion
- GS-1 SAMPLING LOCATION
- UNABLE TO COLLECT SAMPLE
- ND NOT DETECTED BY HEADSPACE ANALYTICAL METHOD

**COPY.**

Figure 2 Distribution of DCE in Groundwater Survey Samples, James River Flexible Packaging Plant, San Leandro, California





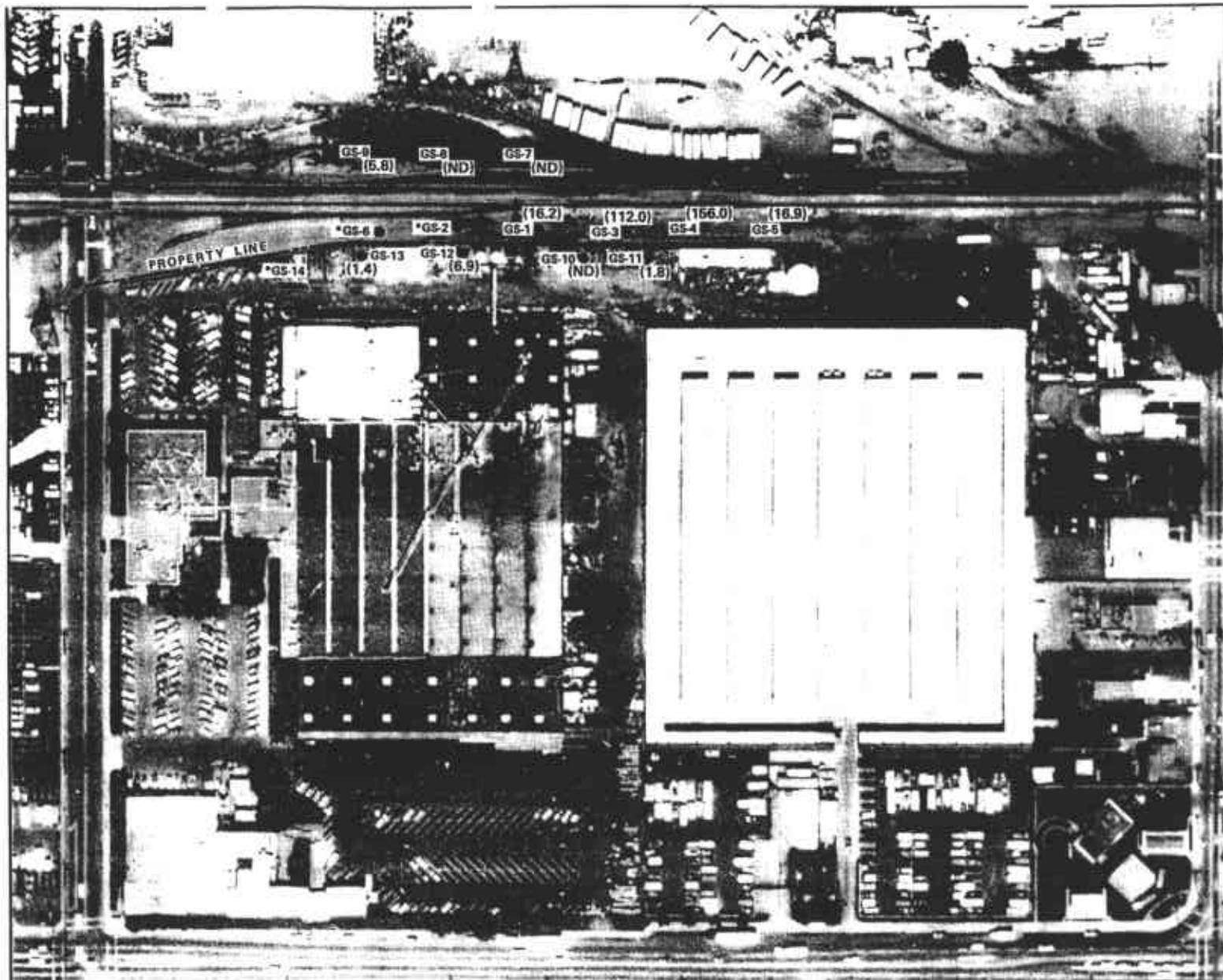
0 50 100  
 SCALE IN FEET  
 (APPROXIMATE)

**LEGEND**

- (4.0) RESULT OF PID ANALYSIS OF HEADSPACE SAMPLE, parts per billion
- GS-1 SAMPLING LOCATION
  - UNABLE TO COLLECT SAMPLE
- ND NOT DETECTED BY HEADSPACE ANALYTICAL METHOD

**COPY**

**Figure 3** Distribution of TCE in Groundwater Survey Samples, James River Flexible Packaging Plant, San Leandro, California



0 50 100  
SCALE IN FEET  
(APPROXIMATE)

**LEGEND**

- (4.0) RESULT OF PID ANALYSIS OF HEADSPACE SAMPLE, parts per billion
- GS-1 SAMPLING LOCATION
- UNABLE TO COLLECT SAMPLE
- ND NOT DETECTED BY HEADSPACE ANALYTICAL METHOD

**COPY**

Figure 4 Distribution of PCE in Groundwater Survey Samples, James River Flexible Packaging Plant, San Leandro, California

Table 1. Results of Groundwater Analyses,  
micrograms per liter.

Sample I.D.	TCE	PCE	DCE
GS-1	4.0	12.7	6.2
GS-2	unable to collect sample		
GS-3	1.2	4.5	112.0
GS-4	16.2	9.9	156.0
GS-5	6.8	7.1	16.9
GS-6	unable to collect sample		
GS-7	1.0	<1.0	<1.0
GS-8	1.7	<1.0	<1.0
GS-9	176.0	5.8	2.2
GS-10	<1.0	<1.0	<1.0
GS-11	3.6	<1.0	1.8
GS-12	2.5	7.2	6.9
GS-14	1.0	16.2	1.4
GS-14	unable to collect sample		
GS-9*	160	3	3 (cis-1,2) 2 (trans-1,2)

< indicates compound not detected at limits noted.

\* Groundwater sample analyzed at BCA.  
DCE results reported for individual isomers.

**-WEGE-**

**WESTERN GEO-ENGINEERS**

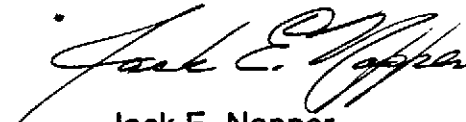
CALIF. CONTRACTOR # 513857 A CORPORATION  
REGISTERED GEOLOGISTS

Proj. Sec. 34 , T2S; R3\ , MDB&M

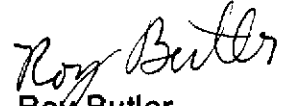
1386 E. BEAMER STREET  
WOODLAND, CA 95695-9603  
FAX (916) 662-0273  
(916) 662-4541

JULY 19, 1990

FOR  
DONNA L. COURINGTON  
BROWN AND CALDWELL  
P.O. BOX 8045  
WALNUT CREEK, CA 94596-1220  
(414) 937-9010  
FAX (415) 937-9026

  
Jack E. Napper  
Registered Geologist #3037

PROJECT  
JAMES RIVER  
FLEXIBLE PACKAGING PLANT  
2101 WILLIAMS STREET  
SAN LEANDRO, CALIFORNIA

  
Roy Butler  
Geologist

Map source	AAA, USGS, WEGE	
Date	07/02/90	07/03/90
Geologist	ROY BUTLER	ROY BUTLER
Crew Total	3	3
Mob hours	5:30-8:15 HR = 2.75 HRS	
Hours (site)	8:15-17:00 = 8.75 HRS	7:00-14:15HR = 7.25 HRS
Demob Hours	14:15-18:00 - .5LUNCH = 3.25HRS	
Unit#	3A	3A
Equipment	PID CHROMTOGRAPH, FID , FID CHROMATOGRAPH RIG 2	
Steel size(s)	1/2" TO 5/8"	SAME
Bit size	9/16" TO 3/4"	SAME
Tube size	1/4"	1/4"
Weather	CLEAR	CLEAR
Temperature	85	85
Barom. Press	--	--
Total ft. drilled	195	160
Sample		
# holes	9	6
# sites	7	5
# vapor	0	0
# liquid	7	5
# soil	0	0
# chromat	11	6
# FID	11	7
# IR	0	0
# cert. soil	0	0
# cert. liq.	0	1

METHODS; EQUIPMENT; DATA, Etc., QA&QC; NOTES: See Appendixes A through E.

### LOCATION

The study site is the eastern edge of the James River Flexible Packaging Plant and the adjoining Southern Pacific Railroad right of way. The Plant is located at 2101 Williams Street east of the intersection of DoLittle Road, San Leandro, California. The site is in projected Sec. 34; T2S; R3W; MDB&M at approximately 20 feet above sea level.

### PURPOSE and PROCEDURE

To determine the extent of ground water contamination associated with the above mentioned site.

A series of small holes were to be drilled to ground water along the railroad tracks and along the eastern edge of the Plant compound; water samples obtained from these holes were to be collected and analyzed for organic solvents.

#### SAMPLING PROCEDURE- SOIL PROBE SURVEY

During a Soil Probe Survey (SPS) a number of holes are drilled at selected locations in order to determine solvent contamination at certain soil depths and locations.

The holes are drilled by driving a 5/8" steel rod into the ground using an electric jack hammer. After the rod has been driven to the desired sample depth, the rod is removed using a hydraulic puller, and a vapor and a soil sample are then taken.

The vapor sample is gathered by placing a steel tube into the hole, pulling a known volume of air to evacuate the tube and then taking the vapor sample with a 1 cc syringe. The sample is then injected into a FID analyzer where a Total Volatile Organics (TVO) value is obtained. After the vapor sample has been taken the soil sample is collected.

A steel sampler with an inner plunger and a 3/8" by 2" brass sleeve fitted to the end is used to gather a small (1 to 4 grams) soil plug of the relatively undisturbed soil from the base of the hole. The sample is placed into a 40 ml VOA Vial. The soil is examined under the Ultraviolet (U.V.) scope in order to determine if any petroleum fluorescence is visible in the sample. The sample is then weighed, placed into a hot water bath and allowed to come to equilibrium. After the sample has reached equilibrium, a headspace sample is obtained and injected into a FID (flame ionizing detector) chromatograph which produces a chromatogram of the sample. The resulting chromatogram is compared with standard chromatograms to determine the levels of the volatile organics present.

## -WEGE-

If water is encountered, it is sampled by lowering 1/4" tubing into the hole and pulling the sample to the surface, under a vacuum. The sample is collected in a 40 ml VOA Vial. The water is then examined under the U.V. scope in order to determine if any petroleum fluorescence is visible in the sample. The sample is then placed into a hot water bath and allowed to come to equilibrium. After the sample has reached equilibrium, a sample of the headspace is taken and injected into a calibrated FID chromatograph; the resulting chromatograms are examined for volatile organics.

### SCOPE

The Wege Soil Probe Survey by Roy Butler, Geologist, with two helpers took place on July 2 and 3, 1990. The survey was overseen by Donna Courington of Brown and Caldwell Consultants.

Over the course of the two days a total of 15 holes were drilled to collect samples of ground water. Samples were successfully collected from 12 of the holes (see table 1). One of the samples was collected for the Brown and Caldwell laboratory. The remaining samples along with a sample from monitor well W-5, were analyzed in the WEGE portable laboratory. Headspace analysis was performed on the samples with a FID chromatograph. The levels of chlorinated hydrocarbons encountered in most samples were near the lower detection limits of the FID detector; therefore, with the exception of sample from W-5, the samples were reanalyzed with a Photovac 10S50 PID chromatograph. The PID detector has a much greater sensitivity to the chlorinated hydrocarbons; PID detection limit for TCE = 1 ppb, while the FID detection limit for TCE = 40 ppb. (see table 1 for results).

TABLE 1, RESULTS SOIL PROBE SURVEY WATER SAMPLES.  
 JAMES RIVER FLEXIABLE PACKAGING PLANT  
 2101 WILLIAMS STREET  
 SAN LEANDRO, CALIFORNIA

HOLE	DEPTH	DATE	ACETONE	CH3CL	DCE	TCE	PCE	TOL
				PPM	PPB	PPB	PPB	PPB
GS-1	20	07/02/90	4	<0.01	4.0	12.7	6.2	<10
GS-2	20	07/02/90	COULD NOT COLLECT SAMPLE					
GS-3	20	07/02/90	<1.0	<0.01	1.2	4.5	112.0	<10
GS-4	15	07/02/90	<1.0	<0.01	16.2	9.9	156.0	<10
GS-5	20	07/02/90	<1.0	<0.01	6.8	7.1	16.9	<10
GS-6	20	07/02/90	COULD NOT COLLECT SAMPLE					
GS-7	20	07/02/90	<1.0	<0.01	1.0	<1.0	<1.0	<10
GS-8	20	07/02/90	<1.0	<0.01	1.7	<1.0	<1.0	<10
GS-9	20	07/02/90	<1.0	<0.01	2.2	176.0	5.8	<10
GS-10	20	07/03/90	<1.0	200.00	<1.0	<1.0	<1.0	<10
GS-11	20	07/03/90	<1.0	1.86	3.6	<1.0	1.8	<10
GS-12	20	07/03/90	<1.0	<0.01	2.5	7.2	6.9	<10
GS-13	20	07/03/90	<1.0	<0.01	1.0	16.2	1.4	<10
GS-14	20	07/03/90	COULD NOT COLLECT SAMPLE					
GS-9A	20	07/03/90	COLLECT SAMPLE FOR B&C LAB					
W-5	--	07/03/90	<1.0	242.30	<1.0	939.0	144.0	<10

CH3Cl = Chloromethane = Methyl Chloride, values approximate.  
 We do not carry standard for Methyl Chloride in lab.  
 peak values are compared to Methylene Chloride

DCE = Dichloroethylene

TCE = Trichloroethylene

PCE = Tetrachloroethylene

TOL = Toluene

PPM = parts per million = milligrams/liter

PPB = parts per billion = micrograms/liter

APPENDIX A

EQUIPMENT (General 5-10-89)

Western Geo-Engineers laboratory units are specially equipped with a WEGE PRCD chromatograph; an FID analyzer and/or chromatograph; a PID chromatograph; an analyzer (methane sensitive); at least one type of handheld vapor or vapor/oxygen screening detector, (depending on field situations); a computer with plotter and/or printer; a microscope; liquid test kit (resistivity, pH, chloride, nitrate, calcium, fluorescence, H<sub>2</sub>S and hydrocarbons or other organic vapors by headspace, etc.); soil or core test kit (lithology, headspace, pH, fluorescence, sieve analysis, etc.); misc. gas, soil and water collecting, sampling and storing material/equipment; a refrigerator; an air conditioner and heater; weather indicating equipment (thermometer, relative humidity meter, barometer, wind speed, and wind direction); surveying equipment (a transit, tripod, rod, chain, Brunton compass, and other miscellaneous equipment); a very stable 6.5 KW electric generator; four or more types and or sizes of "drill steel" both solid and tubular; several sizes and types of "bits" and stabilizers (to maintain straight holes), x-over adapters to facilitate the use of combination "drill strings"; several sizes of conductor casing to prevent surface caving; three or four (five or six types for special problem areas) types and sizes of drilling devices ranging from hand drivers, electric hammers, vibrators, electric rotary drills, augers (hand and power) and combinations of all devices; several types of pulling equipment including hammer (pounder), cable (or rope), tripod, mechanical and hydraulic hand jacks, and gasoline or electric powered hydraulic ram pullers; fire extinguisher(s); cleaning sterilizing, and sanitizing equipment and material; spare parts, supplies, and tools; and other related equipment.

APPENDIX B

METHODS (General 5-10-89)

The special driving bars ("drill steel") are used to "drill" or to open holes to the needed diameter, usually 5/16" to less than 1 inch. Holes are usually driven to a predetermined level, most commonly between five and ten feet. The driving bar is either pulled from the hole and a sampling tube lowered, or the vapors are sampled through the driving bar with a special tubing and packer set.

Core samples of the soil are taken after the vapor sample has been taken; if maximum lithology data are required, the entire hole may be cored (in small segments one after another). The hole is then



## **-WEGE-**

driven/"drilled" to the next sample interval (depth) where the sampling process is repeated. Core samples are cut at each sample depth, which are usually collected on even increments to "total" depth. Deeper holes are usually sampled at five or ten foot intervals. The cores for analysis are cut and retrieved, then within seconds, are pressed into vials and capped. Normally the cores are untouched, even by the clean disposable gloves of the geologist or operator. The core sleeves for the certified laboratory are labeled and placed in a freezer or cooler and frozen. The cores are examined and noted for later stratigraphic mapping procedures as well as UV identification of "product" or "contaminant" both before and after the "solvent" dissolution and headspace stabilization process. When "undisturbed" soil samples are required the hole diameter must be enlarged before driving the core barrel.

Liquid samples (water or product) when available, are collected from the holes for on-site analysis by "headspace" methods. They may be sent to other labs for independent verification. Probes may be temporarily implanted as part of a complete hydrogeologic study. Permanent monitor wells may also be installed at this time.

Hole sites are mapped by transit and chain or by Brunton and chain methods, depending upon time allotted and accuracy required. Methods used for providing the hole vary with the depth, material being penetrated, moisture content, and purpose of the survey. These methods include: rotary, pounding, hammering, vibrating, pressing, and vacuum drilling; each usually is of greater benefit than the others under certain given circumstances and several methods are usually used on each project.

Vapor samples are screened with an FID or a PRCO or a PID analyzer to obtain a preliminary TVO (Total Volatile Organics) value before running the samples through the calibrated chromatograph(s) to determine the composition and concentration of the vapors found in the pore spaces in the soil. See APPENDIX D on Quality and Quantity Control. Some equipment can only be used once. This equipment is discarded if liquid product or high concentrations of product vapor are encountered. If contaminated, solid metal parts are sterilized before using them again. See APPENDIX D on Quality and Quantity Control.

After all data is obtained from a test hole, the hole is destroyed by filling with dry bentonite from bottom to within to 12 inches of surface, then finished with neat cement, grout, blacktop or clean native soil, whichever is appropriate for the existing surface. Neat cement is used, from bottom to top in some California counties.

DATA GATHERING AND PRESENTATION (General 5-10-89)

The hole locations (and base map data points if map is not furnished by the client) are surveyed, calculated and entered into the computer. Sample data is logged and entered into the computer as it is gathered, so that a current shaded contour map can be generated and/or plotted at any time during the survey. Having an up-to-date "contour" map helps to show the geologist where additional data points (holes) are needed.

Figures 1 and 2 are usually street or road location maps and USGS topographic maps (if available). Figure 3 is usually the actual site plan map showing test hole locations and depths. Figure 4 (etc.) is (are) stacked 3-D picture(s) of the surface map and each of the level maps to help the visualization of total plume. One or more cross sections may be presented, if warranted, to show additional information for otherwise hard to visualize data. A contour map of the groundwater level or the potentiometric surface may be included if sufficient data is available.

The Table(s) list the data points, water or product levels, vapor values, and headspace values, etc. when available.

The next set of Figures are hand drawn contours of the concentration values for the TVO/TPH (Total Volatile Organic/Total Petroleum Hydrocarbons) and for each of the compounds of interest, which were detected. There is a separate map for each of the above for all sub-surface depth levels surveyed. A computer drawn and shaded "contour" map is furnished showing the machine version of all of the above mentioned hand drawn contour maps.

The shaded contour maps are drawn by the computer using a quadranting variation of the inverse sum of the distance method, to find the average value for each location. This method takes the closest test hole in each quadrant (ie.: northeast, northwest, southeast and southwest), and finds an average value for the point being contoured. The method assumes no false zeros and therefore will bring a high value to the edge of the map if there is no data to stop it.

In the field, data is entered into the computer as the study progresses. A current picture of the project is always available, with the capability to generate shaded contour maps on demand. This allows for quick field evaluation and for the most productive placement of the next test holes.

A copy of each of the intermediate computer shaded contour maps is given to the client's field representative, on site, at the end of the field study, so that plans may be altered or remedial work planned or started immediately.

The next section usually consists of copies of the chromatograms for reference use, if needed. These are followed by a copy of the field notes (work sheets); a copy of the DWR 188 (Water Well Driller's Report) and the Appendices A, B, C, and D (Equipment, Methods, Data Gathering and Presentation, Quality and Quantity Control, respectively).

QUALITY - QUANTITY CONTROL (General 5-10-89)

Analytical laboratory standards are maintained. Field and laboratory methods are standardized to provide maximum accuracy and repeatability.

Fresh calibrant is made daily and injected into the chromatograph(s) and detector(s) at regular intervals. Calibration "checks" are made before the first samples are analyzed. Ambient air samples and blank samples (syringe blanks or internal blank(s)) are run when warranted to check background quality. Syringes, needles, and sampling tubes, are new and of the disposable type and are not re-used. VOA vials, bottles, and other glassware are pre-cleaned to EPA protocols; brass sample sleeves are either cleaned to EPA protocol or steam cleaned. Other sampling equipment is either discarded or sanitized, if when gathering a sample, it comes in contact with a higher than background contaminant concentration level. Disposable sanitized rubber or plastic gloves are discarded after coming into contact with equipment or samples of higher than background contamination levels.

If solid metal parts become contaminated, they are heated and burned with a propane torch, (to sterilize them by vaporizing any product(s) before using them again. Metal "core" sampling, drilling, liquid sampling, or gas sampling equipment is sanitized on location by burning with a propane torch to remove any volatile organic contaminants. Metal tubing or hollow piping, etc. is harder to clean, as the entire inner space must be heated to remove any vapors. Circulating soap and water through the pipe, rinsing with live steam and drying with ultra clean air works well but cannot be done easily in the field. Therefore, this equipment is steam cleaned, and soap and water washed, rinsed, steamed and dried, (off location at night or between jobs). Enough sampling equipment is available so that if "live" or high concentration samples are encountered, new (sterilized) equipment can be used. All new or used pipe and tubing is sterilized and tested for contamination before it is used or re-used.

Quantity values of compounds of interest are determined by regularly re-calibrating the instruments with "known standards" in the general concentration ranges of the actual samples involved, to guarantee the linearity of the instruments. Core samples are weighed, dissolved, and allowed to reach equilibrium before the "headspace" samples are analyzed and values recorded. Water samples with headspace are also allowed to reach equilibrium, before being analyzed in the chromatograph(s). Occasionally, soil samples are collected (with as little headspace as possible) from varying depths to be sent in Volatile Organic Analysis (VOA) vials, (previously sterilized to U.S. Environmental Protection Agency standards) to Certified Analytical Laboratories for confirmation and verification of WEGE's previously reported results.

***-WEGE-***

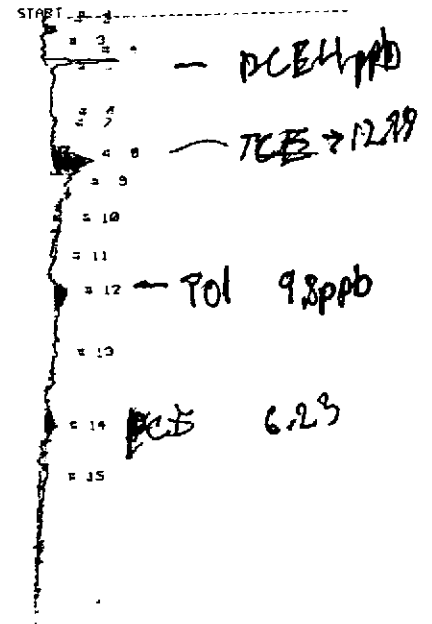
1386 E. BEAMER STREET  
WOODLAND, CA 95695-9603  
FAX (916) 662-0273  
(916) 662-4541

**APPENDIX E  
WEGE  
FID  
&  
PID  
CHROMATOGRAMS**

James River = JR

0.149  
 1.34  
 1.488  
 1.642  
 2.342  
 2.925  
 3.274  
 3.725  
 5.254

GSI



STOP R 1000.0  
 SAMPLE RUN JUL 2 1998 10:42  
 ANALYSIS # 2  
 TEMPERATURE 27  
 GAIN 28

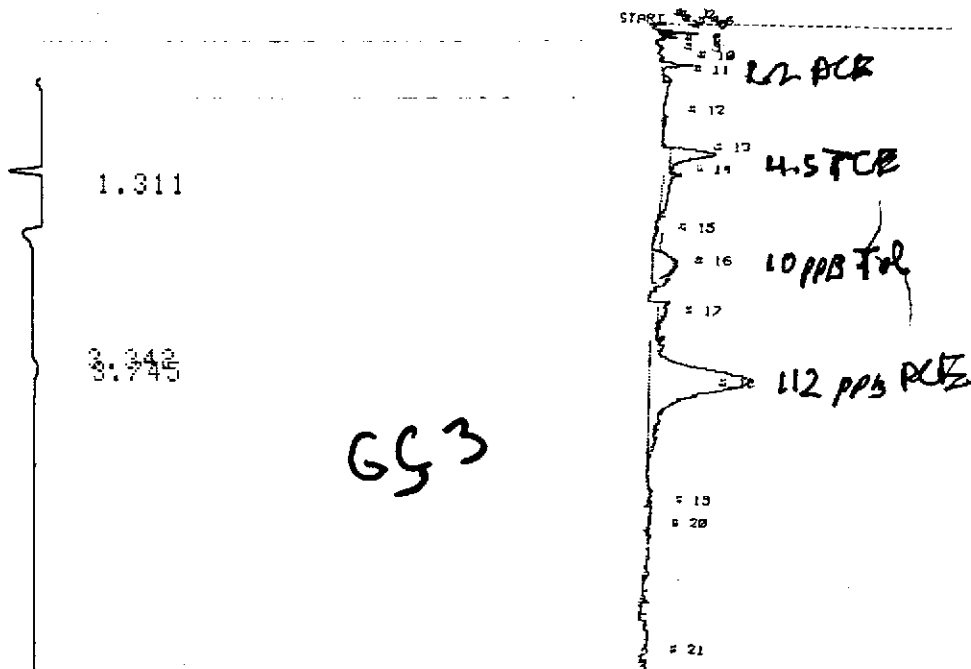
COMPOUND NAME	PEAK	R.T.	AREA
UNKNOWN	1	0.149	1761
UNKNOWN	9	2.925	2580
UNKNOWN	10	3.274	3803
UNKNOWN	12	4.408	4400
UNKNOWN	14	6.438	6438
UNKNOWN	15	7.288	7288

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 8

FILE U  
 METHOD 44  
 SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	0.149	1761				
2	1.34	4744				
3	1.488	2413	V			
4	1.642	589	V			
5	2.342	7897				
6	2.925	2580	V	3	0.0688	TCE
7	3.274	3803	V		4.4	
8	3.725	1787	V	4	0.0591	PCE
9	5.254	346				
TOTAL		25919			0.1278	

JR



CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 15

STOP @ 1000.0  
 SAMPLE RUN JUL 2 1990 12:20  
 TEMPERATURE 25 20

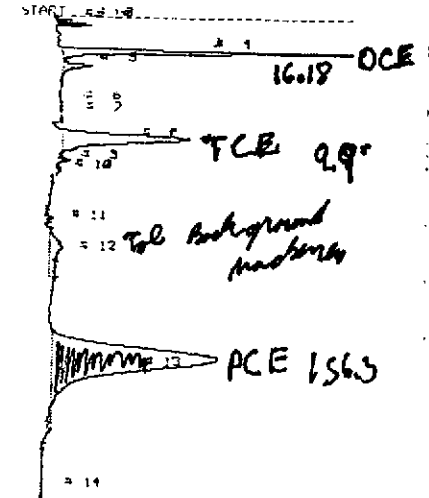
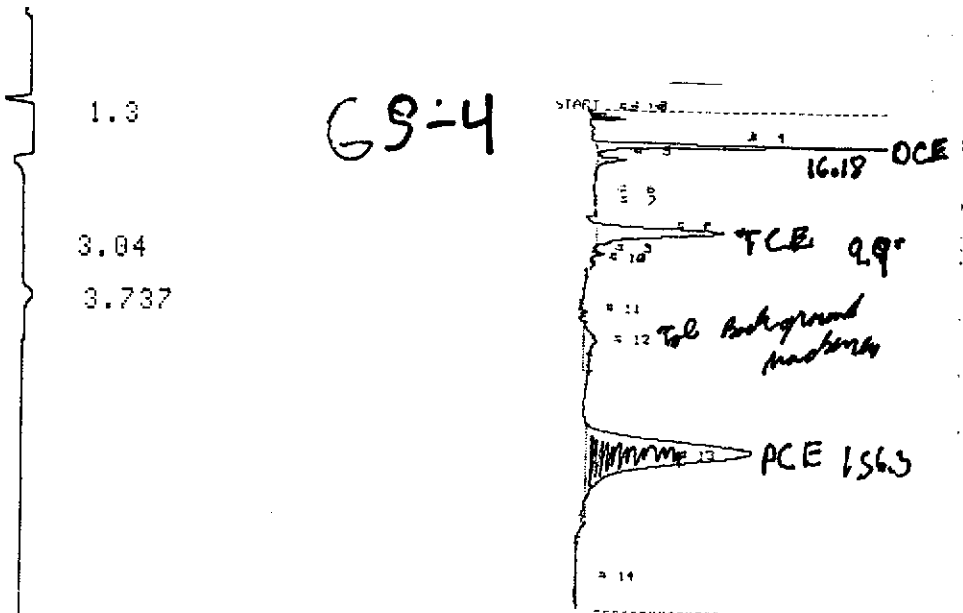
COMPOUND NAME	PEAK	R.T.	AREA/PPB
UNKNOWN	10	66.0	132.5 μS
UNKNOWN	11	90.5	168.3 μS
UNKNOWN	13	210.0	3.0 μS
UNKNOWN	14	244.0	1.2 μS
UNKNOWN	16	383.0	2.3 μS
UNKNOWN	18	891.7	0.1678 μS

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.311	3174				
2	3.342	261				
3	3.745	1123	V	4	0.0371	PCB
TOTAL		4558			0.0371	

CHROMATOGRAM 101 MEMORIZED

JR

69-4



STOP # 782.2  
 SAMPLE RUN JUL 2 1968 13111  
 ANALYSIS # 0  
 TEMPERATURE 30  
 GAIN 20

COMPOUND NAME	PEAK	R.T.	AREA/100
UNKNOWN	0	23.1	134.4 μS
UNKNOWN	4	66.7	5.0 μS
UNKNOWN	5	31.3	553.2 μS
UNKNOWN	8	206.4	6.2 μS
UNKNOWN	9	242.3	270.5 μS
UNKNOWN	10	258.3	147.1 μS
UNKNOWN	12	381.7	1.7 μS
UNKNOWN	13	553.1	22.2 μS

CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0

FILE 0  
 METHOD 44

REPORT NO 17

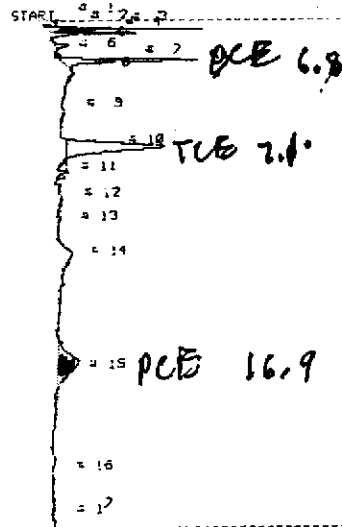
SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.3	2353				
2	3.04	313		3	0.0083	TCE
3	3.737	1537		4	0.0508	PCE
TOTAL		4202			0.0591	

JR

1.289

GS-5



STOP 8 800.0  
 SAMPLE RUN JUL 2 1958 13:22  
 ANALYSIS 3  
 TEMPERATURE 31  
 BATH 70

COMPOUND NAME	PEAK	R.T.	AREA	OFF
UNKNOWN	2	13.2	592.1	μS
UNKNOWN	3	15.7	271.7	μS
UNKNOWN	4	22.0	514.8	μS
UNKNOWN	5	40.1	218.1	μS
UNKNOWN	7	65.3	2.1	US
UNKNOWN	10	202.8	4.8	US
UNKNOWN	12	285.1	306.6	μS
UNKNOWN	14	373.7	335.8	μS
UNKNOWN	15	547.2	2.4	US

CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC

CHANNEL NO 1

SAMPLE NO 0

REPORT NO 19

FILE 0

METHOD 44

SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.289	2355				

TOTAL 2355

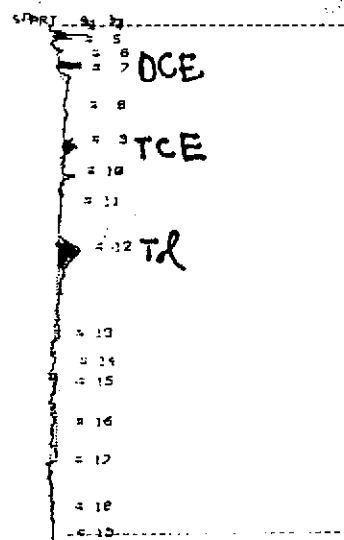
CHROMATOGRAM 101 MEMORIZED



JR

GS-7

1.313



STOP 000.0  
 SAMPLE RUN JUL 2 1959 15: 6  
 ANALYSIS 1  
 TEMPERATURE 31  
 GAIN 20

COMPOUND NAME	PEAK	R.T.	AREA	%D
UNKNOWN	4	22.5	187.3	0.05
UNKNOWN	6	83.9	312.0	0.09
UNKNOWN	7	84.1	163.2	0.05
UNKNOWN	3	134.7	882.6	0.25
UNKNOWN	18	241.9	122.3	0.04
UNKNOWN	12	352.8	2.3	0.00
UNKNOWN	13	421.8	311.1	0.09
UNKNOWN	15	566.3	120.4	0.04
UNKNOWN	17	686.0	183.7	0.05

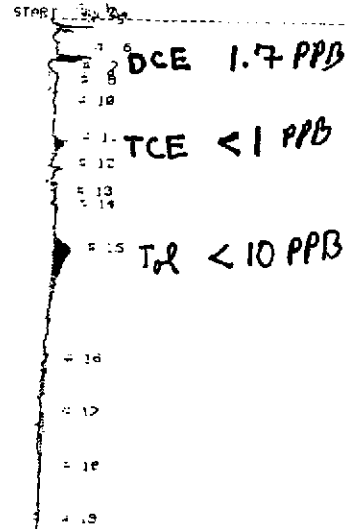
CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 21

FILE 0  
 METHOD 44  
 SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.313	3459				
2	1.472	1748	V			
TOTAL		5207			0	

JR



START 8 800.0  
SAMPLE NO 2 JUL 2 1956 15:40  
TEMPERATURE 30  
GAIN 20

COMPOUND NAME	PEAK	R. T.	AREA/PPB
UNKNOWN	4	15.3	113.8
UNKNOWN	6	65.3	512.2
UNKNOWN	7	34.5	424.4
UNKNOWN	8	102.8	145.4
UNKNOWN	11	202.8	223.6
UNKNOWN	12	232.3	162.3
UNKNOWN	17	326.2	140.7
UNKNOWN	19	304.7	120.5
UNKNOWN	15	370.3	21.0
UNKNOWN	13	733.2	245.8

CHROMATOGRAM 1 MEMORIZED

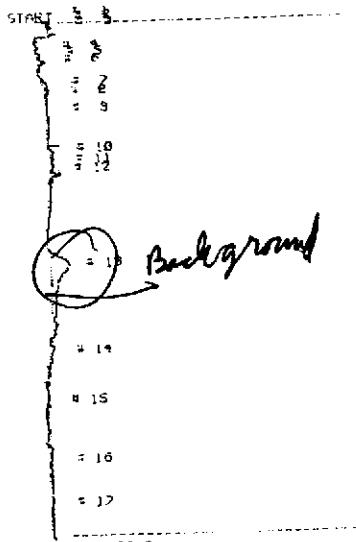
CR501 CHROMATOPAC  
CHANNEL NO 1  
SAMPLE NO 0  
REPORT NO 23

FILE 0  
METHOD 44  
SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.292	4561				
2	1.508	886	V			
3	3.382	458				— Benzene
TOTAL		5905			0	

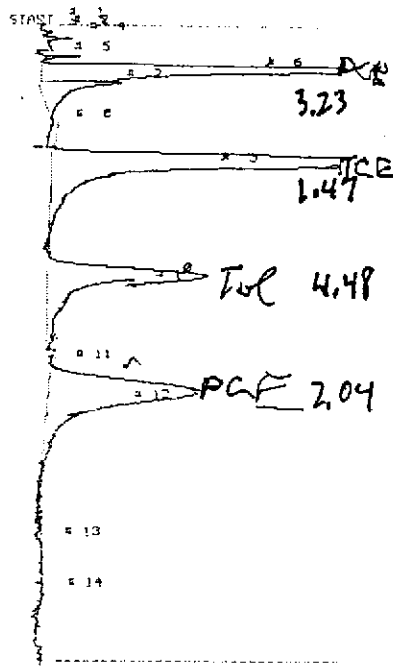
MEMORIZED

# PHOTOVAC



STOP # 988.0  
 SAMPLE RUN JUL 2 1958 12:52  
 ANALYSIS # 6  
 TEMPERATURE 30  
 GAIN 20

COMPOUND NAME	PEAK	R.T.	AREA/HT
UNKNOWN	2	110.8	165.8 μS
UNKNOWN	10	588.4	2.3 μS
UNKNOWN	10	588.4	100.0 μS



STOP # 1000.6  
 SAMPLE RUN JUL 2 1958 11:05  
 ANALYSIS # 7  
 TEMPERATURE 23  
 GAIN 60

COMPOUND NAME	PEAK	R.T.	AREA/HT
UNKNOWN	4	22.8	133.0 μS
UNKNOWN	5	50.4	521.2 μS
UNKNOWN	6	63.2	36.4 μS
UNKNOWN	7	91.1	9.1 μS
UNKNOWN	9	215.2	31.3 μS
UNKNOWN	10	400.2	18.3 μS
UNKNOWN	12	836.3	21.0 μS
UNKNOWN	13	888.6	102.7 μS

7.04

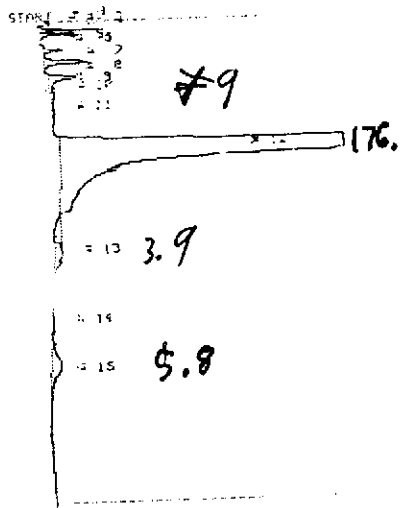
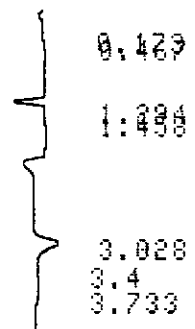
# PHOTOVAC

STOP # 1010  
 SAMPLE RUN JUL 2 1958 12:55  
 ANALYSIS # 7  
 TEMPERATURE 30  
 GAIN 20

COMPOUND NAME PEAK R.T. AREA/HT

# PHOTOVAC

JR



STOP 8 249.8  
 SAMPLE RUN JUL 2 1959 16:21  
 ANALYSIS # 7  
 TEMPERATURE 20  
 GAIN 20

OFFOUND NAME	PKNO	R.T.	AREA
UNKNOWN	1	0.173	796
UNKNOWN	2	1.458	1679
UNKNOWN	3	3.028	3992
UNKNOWN	4	3.4	447
UNKNOWN	5	3.733	474

CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 26

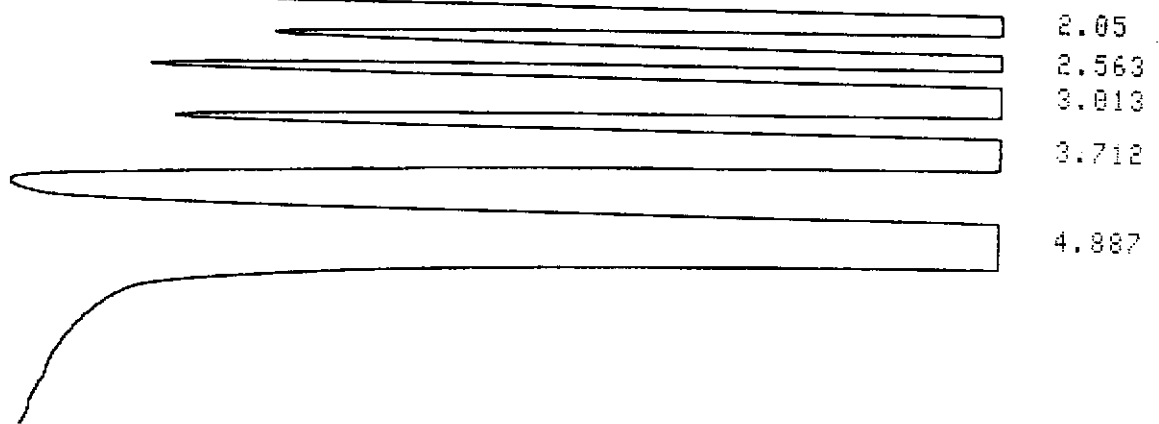
FILE 0  
 METHOD 44  
 SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	0.173	796				
2	1.458	1679	V			
3	3.028	3992		3	0.1064	TCE
4	3.4	447	V			
5	3.733	474	V	4	0.0157	PCE
TOTAL		11450			0.1221	

JR

Standard

1.328  
1.656  
1.765



CR501 CHROMATOPAC

CHANNEL NO 1  
SAMPLE NO 0  
REPORT NO 8

FILE 0  
METHOD 44  
SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.328	5131				
2	1.656	8305	V			
3	1.765	8172	V			
4	2.05	4132015	V	1	118	DCE
5	2.563	1189461	V	2	126	DCM
6	3.013	3154634	V	3	138	TCE
7	3.712	2094245	V	4	150	PCE
8	4.887	5760821	V	5	82	TOL
TOTAL		16352782			613.9998	

JR

0.155

1.723

2.283

1.211

GS-10

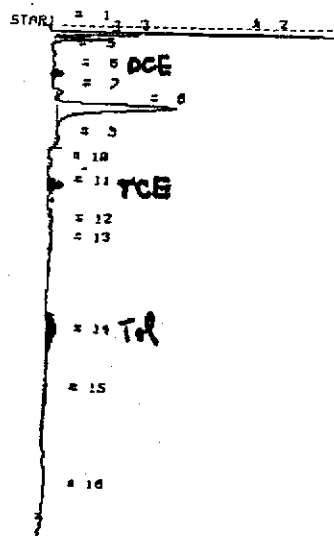
CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC

CHANNEL NO 1  
SAMPLE NO 0  
REPORT NO 11

FILE 0  
METHOD 44  
SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC
1	0.155	891			
2	1.211	1959447	S	CH <sub>2</sub> Cl	202.00.
3	1.723	3234	T		
4	2.283	3071			
TOTAL		1966643			0



STOP @ 792.8  
 SAMPLE RUN JUL 3 1968 10:11  
 ANALYSIS # 7  
 TEMPERATURE 24  
 GAIN 20

COMPOUND NAME	PEAK	R.T.	AREA	PPM
UNKNOWN	2	12.5	2.2	US
UNKNOWN	3	18.2	341.8	MUS
UNKNOWN	4	23.9	584.3	MUS
UNKNOWN	6	27.7	138.2	MUS
UNKNOWN	7	100.3	101.5	MUS
UNKNOWN	8	131.3	4.5	US
UNKNOWN	9	182.3	165.8	MUS
UNKNOWN	11	257.2	485.9	MUS
UNKNOWN	12	312.1	159.6	MUS
UNKNOWN	14	487.8		

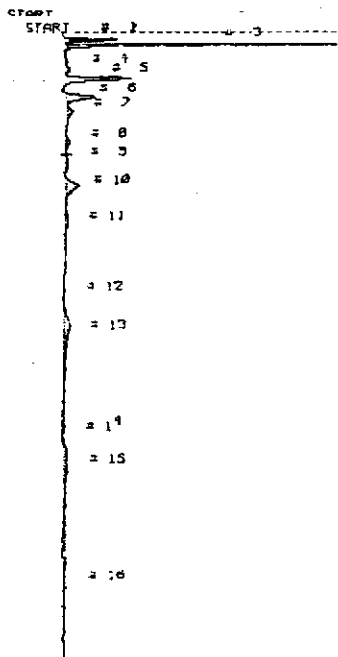
JR

0.173

1.408

1.86 CH<sub>3</sub>Cl

GS-11



CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 15

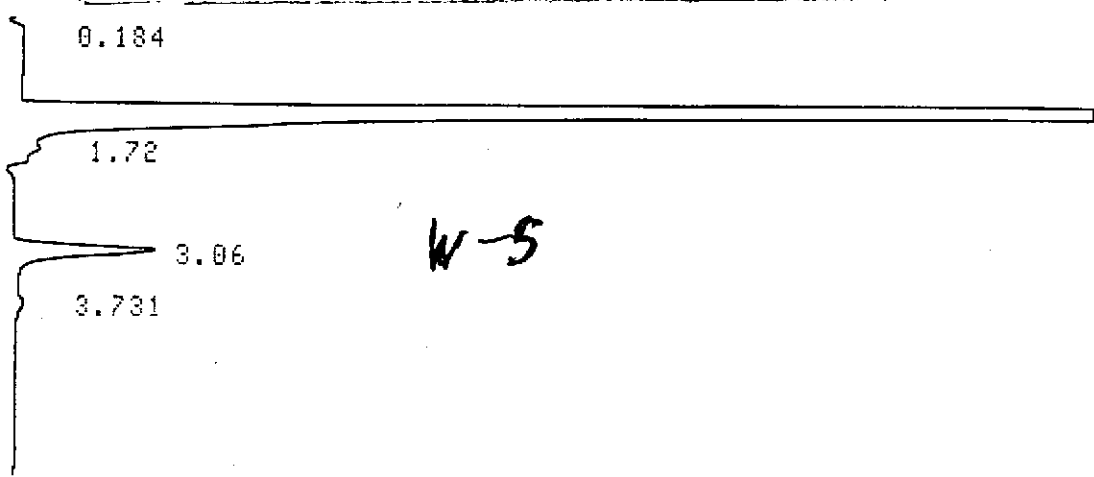
STOP @ 1000.0  
 SAMPLE RUN JUL 3 1959 11:10  
 ANALYSIS # 3  
 TEMPERATURE 25  
 GAIN 20

COMPOUND NAME	PEAK	R.T.	AREA/100
UNKNOWN	1	43.5	122.5
UNKNOWN	2	73.2	11.1
UNKNOWN	3	105.8	684.1
UNKNOWN	7	132.1	183.6
UNKNOWN	10	248.4	526.2
UNKNOWN	11	302.2	142.5
UNKNOWN	13	421.2	629.1
UNKNOWN	15	688.3	282.4

FIL  
MET  
SAMI

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	0.173	1483				
2	1.211	18160	S			
3	1.408	178	T			
TOTAL		19821			0	

JR



CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 19

FILE 0  
 METHOD 44  
 SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	0.184	2639				
2	1.215	2422979	S			
3	1.72	656	T			
4	3.06	21457		3	0.9386	TCE
5	3.731	2003	V	4	0.1435	PCE
TOTAL		2449734			1.0821	

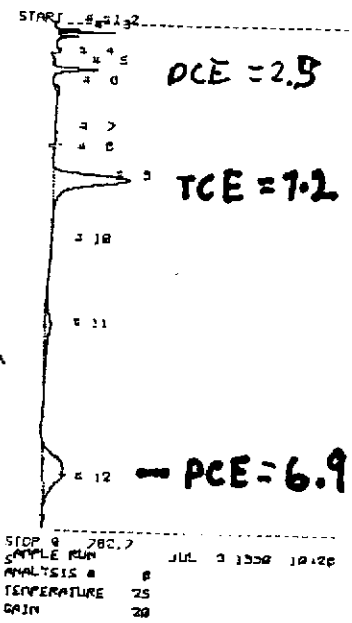
3.06	21457	0.9386	TCE
3.731	2003	0.1435	PCE
TOTAL	23460	0.9821	



JR

GS-12

3.02  
3.708



COMPOUND NAME	PEAK	R.I.	AREA/PPM
UNKNOWN	2	15.8	225.5
UNKNOWN	1	26.4	198.4
UNKNOWN	12	221.8	9.4

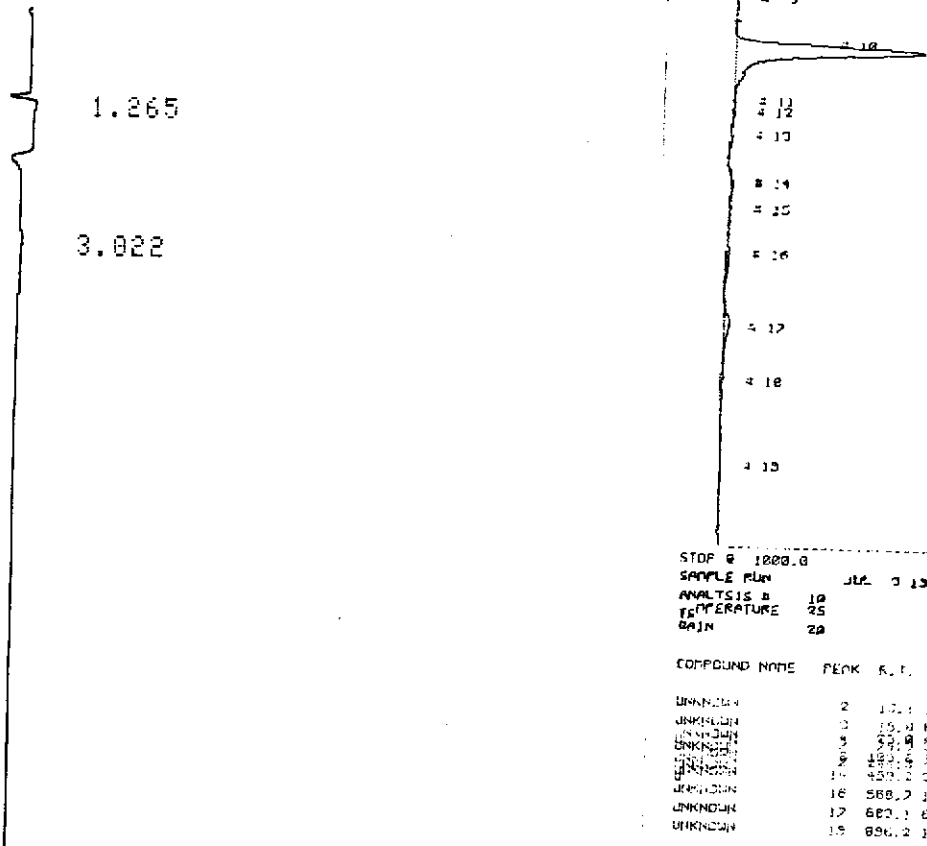
CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 21

FILE 0  
 METHOD 44  
 SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	3.02	198		3	0.0087	TCE
2	3.708	266		4	0.0191	PCE
TOTAL		464			0.0277	

JR



STOP @ 1000.0  
 SAMPLE RUN JUL 3 1958 11:36  
 ANALYSIS @ 10  
 TEMPERATURE 25  
 GAIN 20

COMPOUND NAME	PEAK	R.T.	AREA
UNKNOWN	2	1.265	3227
UNKNOWN	3	3.022	594

CHROMATOGRAM 1 MEMORIZED

CR501 CHROMATOPAC  
 CHANNEL NO 1  
 SAMPLE NO 0  
 REPORT NO 23

FILE 0  
 METHOD 44  
 SAMPLE WT 100

PKNO	TIME	AREA	MK	IDNO	CONC	NAME
1	1.265	3227				
2	3.022	594		3	0.026	TCE
TOTAL		3821			0.026	

3695

ATTACHMENT B

SITE ACCESS PERMIT BETWEEN  
SOUTHERN PACIFIC RAILROAD AND JAMES RIVER CORPORATION



**JAMES RIVER CORPORATION**

FLEXIBLE PACKAGING DIVISION/  
SAN LEANDRO PLANT

2101 Williams Street, San Leandro, CA 94577 (415) 895-4300

June 4, 1990

Ms. Donna Courington  
Brown & Caldwell  
3480 Buskirk Avenue  
Pleasant Hill, CA 94523-4342

RE: Southern Pacific  
Entry Permit Letter  
Dated April 9, 1990

Dear Ms. Courington:

We have issued you our Purchase Order No. SL-05642-E, attached hereto as Attachment A ("Purchase Order"), for the purpose of obtaining from you the services outlined therein. To facilitate your performance of these services, Southern Pacific Transportation Company ("SP") at our request has issued a permit to enter upon SP's property on the terms and conditions outlined in the letter attached hereto as Attachment B ("SP Entry Permit").

This letter constitutes your authority to enter the property under the SP Entry Permit subject to and on condition that

- a) You will accept the terms and conditions of our Purchase Order;
- b) You will perform the services outlined in the Purchase Order as an independent contractor and not as the agent of James River (The fact that, as between SP and James River under the SP Entry Permit, SP considers you as James River's agent shall not detract from this Agreement.); and
- c) You will exercise all due care to comply with the terms and conditions of the SP Entry Permit.

Please indicate your agreement to the foregoing by signing and returning one copy of this letter.

Very truly yours,

  
Robert Wenning  
Engineering Manager

Accepted and agreed to this

12 day of June, 1990.

By: Patrick Maroney  
Typed Name: Patrick Maroney  
Title: Vice President

0507-105(K)/Attachments

ATTACHMENT 2

# Southern Pacific Transportation Company

Southern Pacific Building • One Market Plaza • San Francisco, California 94105

W. E. FOWLER  
DIRECTOR-CONTRACTS AND JOINT FACILITIES  
R. A. PUTRELL  
MANAGER-CONTRACTS  
J. E. GROTHER  
MANAGER-JOINT FACILITIES

310-1  
May 11, 1990

R. S. DICKINSON  
JOINT FACILITY OFFICER  
M. M. BROUSSARD  
J. L. WAHLER  
CONTRACT AGENTS

James River Corp.  
c/o Brown and Caldwell  
2101 William St.  
San Leandro, CA 94511

Gentlemen:

Southern Pacific Transportation Company (Railroad), subject to the following terms and conditions hereby permits James River Corporation (JRC) to enter upon Railroad's property at or near Mulford, County of Alameda, State of California in the vicinity of M. P. 15.5 for the purpose of installing monitoring wells to take soil and water samples at the approximate locations shown on the attached Drawing No. L-15.5-L dated March 23, 1990.

JRC will pay Railroad partially to defray the cost of handling the sum of Five Hundred Dollars (\$500.00).

In performing said work JRC and/or its contractor's forces shall use only public roadways to cross from one side of Railroad's tracks to the other.

All work shall be done in a good and workmanlike manner at the sole cost and expense of JRC and to the satisfaction of Railroad. JRC's installation plans shall be subject to approval of Railroad. The tracks, communication lines and other facilities of Railroad will not be interfered with and the work will be so prosecuted that there will be no interference with or delay to the operations of Railroad.

JRC shall obtain written consent of any lessee, licensee or grantee of Railroad at the time in possession of any of the land included hereunder.

In view of the possible existence of subsurface pipelines or other structures, JRC shall, for each test hole, explore for such structures with hand tools to a depth of at least eight (8) feet below the surface of the ground or at JRC's option utilize suitable metal detecting equipment prior to drilling or excavating with mechanized equipment. Railroad does not warrant there are no structures below said level and JRC's operations will be subject at all times to the liability provisions herein.

In addition to other provisions of this agreement requiring JRC to give notice prior to commencing work, JRC shall telephone Railroad at 1-800-283-4237 (a 24-hour number) to determine if a telecommunications system is buried anywhere on or about the premises defined or included herein. If it is, JRC will telephone the owner of the system designated by Railroad, arrange

for a cable locator and make arrangements for relocation or other protection for the system prior to beginning any work on the said premises.

JRC shall furnish Railroad with a copy of all soil and water data and analysis obtained from tests thereof. JRC shall submit to Railroad its plans for any remediation which may be necessary, direct to Railroad's Manager of Environmental Services at the above address.

Any contractors performing work on the premises of Railroad, and/or persons entering the premises to read gauges, etc. on behalf of JRC shall be deemed the agents of JRC.

Drilling operations in connection with test holes shall be no less than fifteen (15) feet from the center line of any track and at no times will cables or equipment of any nature be located less than fifteen (15) feet from the center line of any track.

All open holes will be satisfactorily covered and locked at all times when JRC's forces are not physically working in the actual vicinity thereof.

JRC agrees to reimburse Railroad for all cost and expense by Railroad in connection with said work, including but not limited to the furnishing of such inspector, watchman and flagman as Railroad deems necessary.

It is agreed and understood that upon completion of work covered hereunder, JRC will remove all equipment from Railroad's property and leave the property in a neat and safe condition satisfactory to Railroad. Without limiting the foregoing, JRC shall remove all well casings, shall fill the borings with grout, and shall take any additional action necessary to close the wells required by state or regulation or by any government agency having jurisdiction.

JRC shall, at its expense, comply with all laws, regulations, rules, and orders which are applicable to work done hereunder or result from such work, regardless of when they become or became effective, including, without limitation, those relating to health, safety, noise, environmental protection, waste disposal, and water and air quality and furnish satisfactory evidence of such compliance upon request of Railroad.

JRC agrees to and shall indemnify and hold harmless Railroad, its officers, agents, and employees, from and against any and all fines, penalties, claims, demands, losses, damages, causes of action, suits, and liabilities of every kind (including reasonable attorneys' fees, court costs, and other expense related thereto) arising out of or in connection with any work done, action taken or permitted by JRC, its subcontractors, agents, or employees under this contract or arising out of JRC's failure to comply with the terms of this contract including, without limitation, the preceding paragraph. It is the express intention

of the parties hereto, both JRC and Railroad, that the indemnity provided for in this paragraph indemnifies Railroad for its own negligence, whether that negligence is active or passive, or is the sole or a concurring cause of the injury, death or damage; provided that said indemnity shall not protect Railroad from liability for death, injury or damage, arising solely out of the criminal actions of Railroad, its officers, agents, and employees. The term Railroad as used in this paragraph shall include the assigns and affiliated companies of Railroad and any other railroad company operating on Railroad's tracks.

Permission herein given shall be effective only if accepted within one month from the date hereof and, if so accepted, shall be effective for a period of one (1) year thereafter. JRC agrees to notify Railroad's Regional Offices by letter on facsimile No. (213) 780-6959 at least five days prior to commencing any work on the premises of Railroad pursuant to this permission.

If the above terms and conditions are agreeable, please sign the enclosed duplicate original of this letter and forward same to Regional Engineer, Attn: Mr. J. W. Ivanusich, Southern Pacific Transportation Company, 1200 Corporate Center Dr., Monterey Park, CA, 91754-7605. After the notice provided for above, you may exercise permission herein given.

Yours very truly,

*R.A. Tuttle*

AGREED TO AND ACCEPTED THIS

62 DAY OF JUNE, 1990.

JAMES RIVER CORPORATION

By *Robert Wanning*  
(Title)

*ENGINEERING MANAGER*

Attachment

ATTACHMENT C

BCA ANALYTICAL REPORT  
SAMPLE GS-9



# Analytical Report

LOG NO: E90-07-036

Received: 03 JUL 90

Reported: 18 JUL 90

Ms. Donna Courington  
Brown and Caldwell  
3480 Buskirk Avenue  
Pleasant Hill, California 94523

Project: 5081

## REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION, GROUND WATER SAMPLES	DATE SAMPLED
07-036-1	GS-9	03 JUL 90
PARAMETER	07-036-1	
Purgeable Priority Pollutants		
Date Analyzed	07.10.90	
Date Extracted	07.10.90	
Dilution Factor, Times	1	
1,1,1-Trichloroethane, ug/L	<1	
1,1,2,2-Tetrachloroethane, ug/L	<1	
1,1,2-Trichloroethane, ug/L	<1	
1,1-Dichloroethane, ug/L	<1	
1,1-Dichloroethene, ug/L	<1	
1,2-Dichloroethane, ug/L	<1	
1,2-Dichloropropane, ug/L	<1	
1,3-Dichloropropene, ug/L	<1	
2-Chloroethylvinylether, ug/L	<1	
Acrolein, ug/L	<10	
Acrylonitrile, ug/L	<10	
Bromodichloromethane, ug/L	<1	
Bromomethane, ug/L	<1	
Benzene, ug/L	<1	
Bromoform, ug/L	<1	
Chlorobenzene, ug/L	<1	
Carbon Tetrachloride, ug/L	<1	
Chloroethane, ug/L	<1	
Chloroform, ug/L	<1	
Chloromethane, ug/L	<1	
Dibromochloromethane, ug/L	<1	
Ethylbenzene, ug/L	<1	
Methylene chloride, ug/L	<5	

# Analytical Report

LOG NO: E90-07-036

Received: 03 JUL 90

Reported: 18 JUL 90

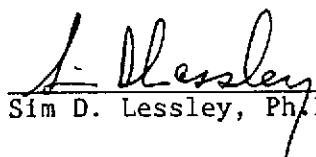
Ms. Donna Courington  
Brown and Caldwell  
3480 Buskirk Avenue  
Pleasant Hill, California 94523

Project: 5081

## REPORT OF ANALYTICAL RESULTS

Page 2

LOG NO	SAMPLE DESCRIPTION, GROUND WATER SAMPLES	DATE SAMPLED
07-036-1	GS-9	03 JUL 90
PARAMETER	07-036-1	
Trichloroethene, ug/L	160	
Trichlorofluoromethane, ug/L	<1	
Toluene, ug/L	<1	
Tetrachloroethene, ug/L	3	
Vinyl chloride, ug/L	<1	
cis-1,2-Dichloroethene, ug/L	3	
trans-1,2-Dichloroethene, ug/L	2	
trans-1,3-Dichloropropene, ug/L	<1	

  
Sim D. Lessley, Ph.D., Laboratory Director

CHAIN OF CUSTODY RECORD

BCA Log Number 9007030

Client name <u>BC-PH</u>				Project or PO# <u>5081</u>		<div style="border: 1px solid black; padding: 5px; transform: rotate(45deg); display: inline-block;"> <u>8240</u>  Hazardous sample  Special handling required </div>					
Address				Phone #							
City, State, Zip				Report attention <u>D. Courington</u>							
Lab Sample number	Date sampled	Time sampled	Type* See key below	Sampled by <u>D. Courington</u>	Number of containers	Remarks					
	<u>7/3/</u>		<u>GW</u>	<u>GS-9</u>	<u>2</u>						

Signature	Print Name	Company	Date	Time
<u>Donna Courington</u>	<u>D. Courington</u>	<u>B+C-PH</u>	<u>7/3/90</u>	<u>14:15</u>
Relinquished by				
Received by				
Relinquished by				
Received by				
Relinquished by				
Received by Laboratory <u>Donna</u>	<u>M. Scott</u>	<u>BCA</u>	<u>7-3-90</u>	<u>14:15</u>

**BC ANALYTICAL**

- 1255 Powell Street, Emeryville, CA 94608 (415) 428-2300
- 801 Western Avenue, Glendale, CA 91201 (818) 247-5737
- 1200 Pacifico Avenue, Anaheim, CA 92805 (714) 978-0113

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at client's expense.

Disposal arrangements: \_\_\_\_\_

\*KEY: AQ—Aqueous NA—Nonaqueous SL—Sludge  
GW—Groundwater SO—Soil OT—Other PE—Petroleum