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**Subject: Perjury Statement
Low-Threat Underground Storage Tank Case Closure Request**

**Reference: RO 0002569
Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606**

PSC Industrial Outsourcing, LP has submitted this report on behalf of Earthgrains Baking Companies, Inc. I declare to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct.

Respectfully,

PSC INDUSTRIAL OUTSOURCING, LP

A handwritten signature in cursive script that reads "Paul Anderson".

Paul Anderson
Project Manager

A handwritten signature in cursive script that reads "John R. Carrow".

John R. Carrow, P.G.
Professional Geologist (#5525)

A handwritten signature in cursive script that reads "Angela Westbrook".

Earthgrains – Authorized Agent
Angela Westbrook
Plant Manager – Oakland Bakery



April 19, 2013

Mr. Dilan Roe, P.E.
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Subject: Low-Threat Underground Storage Tank Case Closure Request

**Reference: Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606
RO #0002569**

Earthgrains Baking Companies, Inc. (Earthgrains) and PSC Industrial Outsourcing, LP (PSC) is submitting this Low-Threat Underground Storage Tank (UST) Case Closure Request based on meeting the criteria presented in the Low-Threat Underground Storage Tank Case Closure Policy (Low-Threat Policy), Resolution Number 2012-0016. This is the second Case Closure request being submitted to the Alameda County Department of Environmental Health (ACEH). PSC and Earthgrains' rationale for the initial Closure Request was documented in the October 31, 2011 Case Closure Request Report and was based on Resolution Number 92-49. This Case Closure request is appropriate pursuant to the Low-Threat Policy.

This Low-Threat Case Closure Request presents the Conceptual Site Model (CSM), Rationale for Case Closure under the Low-Threat Policy, and Conclusion Summary. Site specific Case Contact information is presented in Attachment 1. A completed Low-Threat Policy compliance "Checklist" is presented in Attachment 2. Summary Tables and Figures are presented in Attachments 3 and 4, respectively. An abbreviated report for the First Semi-Annual Groundwater Monitoring Event performed in March 2013 has been prepared in conjunction with this Low-Threat Policy Case Closure Request and is presented in Attachment 5. A copy of the January 20, 2012 California State Water Resources Control Board (SWRCB) UST Cleanup Fund Second 5-Year Review Summary Report recommending Case Closure is presented in Attachment 6.

CONCEPTUAL SITE MODEL

This conceptual site model has been prepared in accordance with the September 2012 California SWRCB Leaking Underground Fuel Tank (LUFT) Guidance Manual. The objective of this CSM is to provide a current opinion on each of the following:

- An understanding of the origin, nature, and lateral and vertical extent of contamination;
- Potential contaminant fate and transport processes and pathways;
- Potential human and environmental receptors that may be impacted by contamination associated with the Site;
- Additional data needed to draw reasonable conclusions regarding the source(s), pathways, and receptors; and
- Evaluation of the risk to human health, safety, and the environment posed by the LUFT Site.

The supporting components of an effective CSM include maps, cross-sections, tables, charts, and soil boring logs. These components were included in previous reports and work plans prepared for the Site. The following sections present a revised summary of the CSM as presented in the previous 2011 Closure Request Report. This CSM summary does not necessarily include all of the supporting data as presented in the 2011 Closure Request Report. However, this summary does present the requisite components of the CSM, including the hydrogeologic setting evaluation, source evaluation, contaminant transport and exposure pathways evaluation, and potential receptors evaluation in the following sections.

Land Use and Environmental Setting

The Site has been a commercial/industrial property since the late 1960s. The current use of the Site is a bakery and bakery product distribution center. The Site is completely covered by pavement and building structures. Based on its close proximity to Interstate 880 and San Francisco Bay, the Site will likely remain a commercial/industrial property for the foreseeable future.

Surface water or storm water from the western side of the Site flows to a storm sewer located about 20 feet west of and parallel to the bakery building. Water in this storm sewer flows north where it empties into a concrete storm-water sewer beneath and parallel to Dennison Street. An additional storm drain is located approximately 25 feet west of the Site beneath King Street. The storm water sewer along King Street flows north and intersects a second storm water sewer that travels beneath and parallel to Dennison Street, approximately 60 feet northwest of the property. This storm water sewer flows west to Embarcadero Street and Brooklyn Basin. Based on the

lateral and vertical extent of contamination in soil and groundwater, impact to surface waters from the release on Site has not and is not likely to occur.

Geologic and Hydrogeologic Setting

The Site is located in the East Bay Plain Sub-basin of the Santa Clara Valley Groundwater Basin. The East Bay Plain Sub-basin aquifer system consists of unconsolidated deposits from the Quaternary age. These deposits include the early Pleistocene Santa Clara Formation, the late Pleistocene Alameda Formation, the early Holocene Temescal Formation, and artificial fill. The cumulative thickness of the unconsolidated deposits is approximately 1,000 feet.

Historical soil boring logs indicate that the predominant soil types beneath the Site consist primarily of silt and silty clay. During source removal corrective action in October and November 2010, soil consisted predominately of silty clays. An inconsistent one to two-foot thick layer of sand was encountered at depths ranging between 11 to 14 feet below-ground-surface (bgs) during the source removal activities. Silty clay was encountered immediately beneath this layer, which was underlain by sand and gravel layers at various depths between 18 to 28 feet bgs. The sand layers encountered at various depths ranging from 11 to 14 feet bgs in the source removal excavation appeared to be native soil and is not consistent throughout the Site. Based on historical soil boring logs across the Site, these permeable sand layers are not laterally continuous across the Site. The soil boring logs for the current monitoring wells, MW-101 through MW-104, supports the discontinuous layer and thus the wells were screened deeper across more permeable zones for monitoring wells MW-101 and MW-102.

Historical drilling activities performed across the Site indicated that groundwater was encountered within the sand and gravel layers located at depths between 18 to 28 feet bgs. Groundwater appeared to be in a semi-confined condition and groundwater levels stabilized at approximately 9 to 10 feet bgs. During the source area removal, water was observed seeping into the northern end of the excavation, however, saturated soil was not encountered on the southern end of the excavation near MW-102 where soil was excavated to 16 feet bgs. PSC believes that the water observed at shallower depths in the northern end of the former source area recharged the underlying permeable layers of the shallow aquifer encountered at depths ranging from 18 to 28 feet bgs. This observation explains the deeper groundwater elevations in MW-102, compared to the other three monitoring wells.

Groundwater flow direction at the Site is generally toward the west with a historical hydraulic gradient ranging from approximately 0.001 to 0.049 ft/ft. An average hydraulic conductivity of 5.02×10^{-4} cm/sec was obtained from slug tests. Using this hydraulic conductivity, an average hydraulic gradient of 0.005 ft/ft and a porosity of 35, the linear velocity of groundwater is estimated to be 7.6 ft/year. This estimate is conservative and the distance traveled by a particle of groundwater should be much less than 7.6 feet a year. The distance a contaminated groundwater plume will travel in a year requires additional parameters for the contaminant, such as solubility and natural attenuation parameters for the soil. Only Total Petroleum Hydrocarbons

as Diesel (TPH-d), which is a mixture and has no specific chemical properties like solubility, has been detected in groundwater at the Site.

Sources of Contamination

The primary source area for the current unauthorized diesel release at the Site is the former diesel dispenser island located south of the former Truck Wash Building. The primary source area was excavated and removed for off-site disposal as presented in the 2011 Corrective Action Completion Report (CACR). The source area soil was removed by excavation in 2010 after the source area groundwater was removed and disposed via a temporary dewatering well. Based on observations from the 2010 source area removal, it appears that diesel fuel released from the former dispenser island pump migrated along the eastern foundation of the former Truck Wash Building into the granular backfill material of the former UST excavation beneath the building. Storm water infiltration through the former cracked pavement in this area has leached contamination into shallow groundwater at the Site.

Chemical-of-Concern and Affected Media

Soil and groundwater analytical data from subsurface investigations and corrective actions at the Site indicate that the chemical-of-concern is TPH-d. No benzene, toluene, ethylbenzene, xylenes (BTEX), naphthalene, or polynuclear-aromatic hydrocarbon (PNA, a.k.a. PAH) concentrations have been detected in soil or groundwater samples collected regarding this 2005 release, with the exception of a single occurrence just above the detection limits collected at the former dewatering well prior to the source removal. Likewise, no methyl tertiary butyl ether (MtBE) has been detected in soil samples collected. TPH-d contamination was encountered in saturated and unsaturated soil and groundwater at the Site.

Extent of Petroleum Hydrocarbons

Subsurface investigations performed in 2006, 2007, and 2009 included drilling 63 soil borings and collecting 298 soil samples; collecting 53 groundwater grab samples; and installation of four groundwater-monitoring wells. The soil and groundwater samples were analyzed for TPH-d and other appropriate contaminants-of-concern. The following sections present a summary of those investigations, the extent of TPH-d, and a comparison to the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Level (ESL) Guidance Document.

Selection of Appropriate ESLs

The Site has been a bakery and product distribution center since the late 1960s and will likely remain a commercial/industrial property in the foreseeable future. Although some properties in

the vicinity have been converted to residential buildings and public use areas, the bakery is not suitable for this use without major renovations or demolition. Therefore, the ESL selections for commercial/industrial properties were appropriate for the Site. The TPH-d concentration in shallow soil (<3 meters) and unsaturated deeper soil (>3 meters) at the Site were compared to both the residential and commercial/industrial ESL to assess the need for environmental land-use restrictions on the property. The residential ESL was used for estimating the mass of residual hydrocarbons in soil.

The TPH-d concentrations in shallow soil were also compared to the ESL for direct exposure of industrial workers. Since the Site is completely covered by concrete and asphalt pavement and structures, PSC believes that a less stringent direct exposure ESL for construction workers in trenches would be more appropriate for the Site.

Groundwater in the vicinity of the Site is listed as suitable for beneficial use on the SFBRWQCB Basin Plan. However, groundwater beneath the Site and vicinity is not suitable for drinking water due to the low yield of the shallow aquifer. Deeper aquifers beneath the Site are not suitable for drinking water due to the close proximity of San Francisco Bay and a potential for salt-water intrusion. Therefore, PSC selected the appropriate ESL for sites where groundwater is not a current or potential drinking water resource for comparison to the soil and groundwater concentrations at the Site. The groundwater ESL of 210 µg/L for TPH-d was selected for comparison to groundwater concentrations at the Site.

Comparison of Analytical Data to ESLs

The soil sample data collected from 1989 through 2009 was compared to the appropriate ESL selections listed in Section 2.5.1 of the Tier 1 Risk Assessment. The comparison of shallow soil data and unsaturated deep soil is summarized in the Corrective Action Completion Report (CACR), as well as sample locations where TPH-d concentrations exceeded the ESL.

Based on soil analytical data from 192 soil samples collected between 2006 and 2009 at the Site, only one soil sample (E-29) exceeded the final residential ESL for TPH-g at 140 mg/kg. The area where this sample was collected was excavated and the material was removed for off-site disposal during the 2010 source area excavation activities.

Nine shallow and 20 deep soil samples exceeded the final ESL for residential properties where groundwater is not a current or potential drinking water resource. The final ESLs presented for TPH-d in the ESL document were based on contaminants in soil leaching to groundwater. Minimal groundwater contamination has been detected in the groundwater monitoring events. Soil sample locations near these groundwater-monitoring wells have exceeded the ESL for soil leaching to groundwater. This indicates that contaminants have not leached to groundwater in concentrations that result in groundwater contamination exceeding the groundwater ESLs.

The extent of TPH-d in soil was delineated and the results were compared with the residential and commercial ESLs of 100 and 180 mg/kg, respectively, for non-drinking water sites. Historical soil sample analytical data are summarized on Tables 1D and 1E of the CACR. Historical groundwater analytical data for monitoring well samples is presented in Table 2D and 2E of the CACR. TPH-d concentrations in historic soil samples and groundwater monitoring well samples from July 22, 2009 are shown on geologic cross-sections in Figures 5 and 6 of the CACR.

Currently, post-source removal groundwater is being monitored semi-annually via four monitoring wells MW-101 through MW-104. Historical data and current data obtained from the 2013 first semi-annual groundwater monitoring event is presented in Attachments; 3 (Tables), 4 (Figures), 5 (Summary Report), 5A (field documentation), and 5B (analytical laboratory report).

Contaminant Fate and Transport

This CSM has been revised based on evaluating the observations made during the 2010 source removal activities. Prior to the source removal activities, TPH-d contamination in soil existed in the source area at depths between 2 and 10 feet bgs. The soil at this depth interval at the Site is typically silt and siltyclay. The saturated granular soils encountered at approximately 9 to 10 feet bgs in the excavation was impacted by contaminants migrating along the footing of the former Truck Wash Building. This soil contamination then migrated to the granular backfill material in the former excavation of the four diesel fuel USTs. This excavation was closer to the source than previously reported. This contamination leached to the groundwater in the shallow permeable zone starting at approximately 10 feet bgs. Based on soil boring logs, this shallow zone is laterally discontinuous across the Site. The soil and granular backfill of the former diesel fuel UST excavation is regarded as a secondary source of contamination to groundwater at the Site. The primary and secondary sources of contamination have been removed by excavation and off-site disposal, as indicated by the soil confirmation samples collected during the source removal activities.

The storm water sewers located along the western side of the bakery and beneath King Street could be a conduit for contaminant migration. However, depth of these utilities near the source area is only 3-4 feet deep bgs. Based on shallow soil samples near the on-site storm sewers, there is less of a potential for these to be a migration pathway. In addition, the source removal excavation indicated no evidence of contamination at or near the utility corridor.

Groundwater beneath the Site is encountered in semi-confined conditions. Shallow groundwater was encountered at approximate 9 feet bgs in some soil borings and in the former UST system excavations. The primary transport mechanisms for residual contamination in the shallow aquifer are advection, adsorption, desorption, and volatilization. Laboratory analytical data from historic subsurface investigations indicate that both saturated soil and groundwater are affected in the shallow aquifer and adsorption and desorption between the two phases could be occurring.

Residual petroleum-hydrocarbon contamination around the former diesel dispenser island and waste oil UST excavation may have migrated with groundwater through advection. It may also be possible that TPH-d contamination has migrated from the former diesel dispenser island source area through the shallow groundwater in the shared excavation of the former fuel tanks. Minor groundwater contamination in wells MW-101 through MW-104 is likely the result of this contaminant transport.

Volatilization of petroleum-hydrocarbon constituents from soil and groundwater into vapor could potentially result in migration to the ground surface or into buildings. However, based on the low volatility of diesel, the siltyclay nature of the soil, the thick concrete pavement, and the elevated concrete slab that the building sets on, contaminant transport through this migration pathway has less of a potential to be complete.

Potential Exposure Pathways and Receptors

Potential exposure pathways and receptors at the Site and nearby properties were evaluated based on current and potential future use. The Site is currently an active commercial and industrial property with nearby land used for commercial, industrial, and residential purposes. The bakery and retail store occupy approximately 90 percent of the Site and both have concrete floors. The remaining surfaces at the Site are paved with concrete or asphalt.

Potentially complete exposure pathways and receptors were identified for the Site using the following criteria:

- A point of potential contact with impacted medium (referred to as the exposure point); and
- An exposure route at the point of contact (inhalation, ingestion, or dermal contact).

Site-specific, potential exposure pathways and potential receptors are evaluated and summarized below:

- Inhalation of chemicals volatilizing from soil or groundwater to indoor or outdoor air (residential, commercial, or industrial receptors);
- Inhalation of volatiles, dermal contact, or incidental ingestion of contaminated soil or groundwater through excavation (industrial or construction workers);
- Ingestion or dermal contact with contaminated groundwater from a potential current or future water supply well (residential, commercial, or industrial receptors); and
- Dermal contact with or incidental ingestion of contaminated surface water (residential, commercial, industrial receptors, or construction workers).

The vapor-intrusion pathway from impacted soil and/or groundwater to outdoor or indoor air is potentially complete. However, diesel contamination is not very volatile and the soil beneath the Site is silty clay. The surface area is paved with concrete or asphalt. The replacement pavement after the source area excavation was replaced with up to 18 inches of new concrete to match the existing adjacent concrete. In addition, the bakery building and buildings near the Site have elevated slabs. The nearest receptors are the bakery, which has an elevated floor slab on the west side of the building. Soil vapor intrusion into this building is not likely to occur and the completion of this potential exposure pathway is not likely. Based upon analytical data from historical subsurface investigations and soil vapor intrusion surveys from similar sites, PSC believes that a soil-vapor intrusion study is unnecessary to evaluate the potential health risks associated with exposure via inhalation of volatiles from the subsurface. As well, the Site does not contain any of the chemicals listed on the October 2011, DTSC Table 1 – List of Chemicals to be Considered for the Vapor Intrusion Pathway.

Based on the presence of paved surfaces at the Site, industrial workers, and occupants will not be subjected to direct exposure (ingestion and/or dermal contact) with residual petroleum-hydrocarbon constituents in near surface or subsurface soil for current land use at the Site. However, construction workers could have direct exposure to residual contamination in near surface and subsurface soil, if excavation occurs in the future.

Potential exposure by ingestion and/or dermal contact with impacted groundwater at the Site is minimal considering the Site is serviced by the East Bay Municipal Utility District (EBMUD). Two abandoned public water supply wells (PRW1 and PRW2) are located northeast of the Site within 2,000 feet. One of the wells is located approximately 700 feet north-northeast and the other water well is approximately 1,400 feet east-northeast of the Site. Both abandoned water supply wells are hydraulically up-gradient of the Site. Environmental Data Resources (EDR) records do not indicate any active water supply or irrigation wells within the search radius. The future installation of shallow water-producing wells within the contaminant plume could create a direct and complete exposure pathway. However, the probability of a water supply well installed in an industrial area this close to the Brooklyn Basin is very low and unlikely.

If contaminated groundwater discharge to surface water occurs, then a potentially complete exposure pathway for off-site receptors and/or construction workers could exist. Based upon a sensitive receptor survey, the closest surface water body to the Site is the Brooklyn Basin within the Oakland Estuary located approximately 800 feet southwest and down gradient of the Site. An unnamed creek flows into the Brooklyn Basin about 1,800 feet northwest of the Site. Wetlands were identified on the EDR figures within 2,000 feet of the Site and generally correspond to the margins of the estuary. There is a potential for surface water impact from storm water sewers, however, based on sample results near the sewer (E-45 and E-46) concentrations exceeding ESLs are limited to a small area. Discharge of contaminated groundwater to surface water at levels that exceed the ESL for marine habitats is unlikely.

Construction workers may have direct exposure to residual contamination in groundwater, if excavation and/or dewatering activities occur at the Site in the future. There is a potential

construction-worker exposure risk for excavation work on utilities beneath King Street. However, the source removal and natural attenuation should significantly reduce the potential exposure.

Residual Petroleum Hydrocarbons in Soil

Prior to source removal activities, a mass estimate of 3,382 Kg of residual petroleum hydrocarbons was calculated based on all samples collected in three areas including a small area at soil boring locations E45 and E46 in King Street (50 ft²), a medium sized area around the former Truck Maintenance Garage (1,500 ft²), and a large area around the diesel fuel dispenser island stretching out into King Street (6,400 ft²). This revised mass estimate is presented in Table 3A of the CACR.

After the source removal activities, PSC calculated the mass of TPH-d removed using the unit weight of soil calculated by weigh tickets and the dimensions of the excavation together with the concentrations of all soil samples collected in the mass removed. This resulted in approximately 1,552 Kg of TPH-d removed. This mass estimate is presented in Table 3B of the CACR.

The area of residual hydrocarbons in the three areas (post-source area removal) was then calculated using the three areas and subtracting the volume of source area soil removed. This resulted in an estimate of only 748 Kg of TPH-d. These three estimates do not balance out due to the significant reduction in the average concentrations used. PSC believes a good estimate of residual TPH-d is a range of between 748 kg and 1,800 kg of TPH-d. The post source removal mass estimate is presented on Table 3C of the CACR. Input parameters for each estimate are presented in Table 5 of the CACR.

Residual Petroleum Hydrocarbons in Groundwater

Groundwater grab samples collected from open boreholes during historic Site investigations are not representative of groundwater quality and could have residual petroleum hydrocarbons in suspended sediments. Based on this opinion, concentrations of TPH-d in groundwater grab samples were not included in the ESL comparisons. However, these groundwater grab samples were used to estimate the area where residual hydrocarbons are found. Groundwater is encountered in semi-confined conditions at a static depth of approximately 10 feet bgs in the source area and 20 feet bgs over most of the Site. The rise in water levels after encountering the permeable zone at the Site indicates an upward vertical gradient on groundwater. A total thickness of 20 feet for groundwater was used for the mass estimates.

Based on the opinion that residual hydrocarbons may be remaining near areas where historical groundwater grab samples were collected, the area of impact was estimated over an area encompassing the monitoring wells and groundwater grab samples. Average concentrations in

the monitoring wells in these areas were used. This resulted in an estimate of 0.55 Kg of TPH-d in groundwater.

The groundwater analytical data from the post-source area removal indicates that TPH-d concentrations in groundwater samples from the monitoring wells were below the ESL of 210 µg/L for sites where groundwater is not a current or potential drinking water resource. Concentrations of BTEX or PAHs were not detected in any groundwater samples analyzed from the semi-annual groundwater-monitoring events.

RATIONALE FOR CLOSURE UNDER THE LOW-THREAT POLICY

The Checklist for the Low-Threat UST Case Closure Policy has been completed to confirm that this Site meets all Checklist criteria. Each Checklist criterion is presented in the following sub-sections and the supportive information for each criterion is detailed in the previous CSM section. A copy of the completed Low-Threat Closure Checklist is presented in Attachment 2.

General Criteria

1. The Site is located within the service area of a public water supply system. The site and vicinity uses the East Bay Municipal Utility District.
2. The unauthorized release at the Site consists only of TPH-d from the former diesel fuel UST system. No other contaminants of concern are present, nor are there any positive concentrations of BTEX or naphthalene in the soil or groundwater.
3. The primary source of the unauthorized release has been stopped through the removal of the former diesel UST and associated product piping and dispensing system.
4. There has never been free product observed in the groundwater monitoring wells at the Site.
5. A CSM has been prepared and updated in the CACR, the previous Closure Request Report, and in this Low-Threat Closure Request Report. The CSM indicates that there are no receptors exposed to any contaminants of concern. A recap of the CSM follows:
 - TPH-d is the only constituent of concern at the Site. BTEX has never been detected in the current four groundwater-monitoring wells. Likewise, PAHs have never been detected in the groundwater at the Site.

- Residual TPH-d concentrations in the post-excavation confirmation soil samples were all non-detect, except for three samples at a depth of 11 feet bgs. The TPH-d concentrations for these three samples were all less than the Leaching to Groundwater ESL.
 - Post-source removal concentrations of TPH-d in groundwater indicate residual TPH-d ranging from 51 to 250 µg/L in the four monitoring wells surrounding the former source area. With the exception of the single occurrence concentration of 250 µg/L, all other post-source removal groundwater samples had concentrations below the Commercial ESL of 210 µg/L.
 - The Site and surrounding vicinity are covered with concrete and asphalt pavement and structures that limit the direct exposure of industrial and/or commercial workers to residual petroleum hydrocarbons in soil and groundwater.
 - Soil vapor intrusion will not occur because of the non-volatile nature of diesel fuel, silt and clay soil, no basement, concrete pavement (12 to 18 inches thick), and the elevated first floor concrete slab of the plant.
6. The secondary source soil was removed through the excavation of 1,224 tons of TPH-d contaminated soil in 2010. This equates to approximately 755 cubic yards of soil removed over an area of approximately 1,800 square feet. Only three of the 17 excavation confirmation soil samples had detectable concentrations of TPH-d. These three samples had concentrations below the leaching to groundwater ESL.
 7. Although MtBE is not required under the Low-Threat Policy for a diesel release, MtBE has been tested and reported for approximately 94 soil samples, of which only two samples reported concentrations at just above the detection limit.
 8. Nuisance as defined by Water Code section 13050 does not exist at the Site.
 9. There are no unique attributes or site-specific conditions that increase the risk associated with the residual TPH-d at this Site.

Media-Specific Criteria

1) Groundwater

None of the four groundwater monitoring well samples have exceeded the water quality objectives during the March 2013 groundwater monitoring event or previous events since the source removal activities were completed in 2010, with one exception. The only occurrence of a groundwater sample exceeding the TPH-d water quality objective

(ESL <210 µg/L) was for well MW-102 during the January 2012 monitoring event at 250 µg/L. The groundwater samples for the well have met the objective in the two subsequent events since January 2012.

Since the contaminant plume does not exceed the water quality objectives, the additional characteristics do not apply. Yet, the additional characteristics of the five classes have been evaluated as well. The Site meets all of the additional characteristics for Class 1, which would most closely correlate to this Site. The contaminant plume that exceeds water quality objectives is less than 100 feet in length, there is no free product, and the nearest existing water supply well or surface water body is greater than 250 feet from the defined plume boundary.

2) Petroleum Vapor Intrusion to Indoor Air

The Site meets Policy criterion 2a, scenario 3. Benzene concentrations have been historically non-detect, which meets the criterion of being less than 100 µg/L. There is at least the minimum distance of separation of five feet vertically between the dissolved phase of benzene (non-detect) and the foundation of the existing building (Table 1B of the 2011 Closure Request Report). The concentration of residual TPH-d in existing soil is less than 100 mg/kg throughout the entire depth of the bioattenuation zone. In addition, the bakery building and buildings near the Site set on elevated floor slabs, which would deter vapor intrusion.

3) Direct Contact and Outdoor Air Exposure

The Site meets Policy criterion 3a. Maximum concentrations in soil are less than those listed in Table 1 for Residential, Commercial/Industrial, and Utility Worker. All soil sample concentrations for benzene, ethylbenzene, and naphthalene have historically been non-detect. There are no soil PAH analytical data, however, the analysis for PAHs is not required for a TPH-d release. Although, all groundwater sample data for PAHS (including naphthalene) has been non-detect. In addition, the new concrete pavement which was placed upon completing the source area excavation is up to 18 inches thick to match the existing adjacent concrete thickness, which would deter outdoor air exposure.

CONCLUSIONS

In accordance with the Low-Threat UST Case Closure Policy and based upon data obtained from the source area removal activities, soil and groundwater data obtained from subsurface investigations and semi-annual groundwater monitoring, and the assessment of risk to potential sensitive receptors; PSC, Earthgrains, and the California UST Cleanup Fund believe that no further corrective action is necessary for the unauthorized release of petroleum

hydrocarbons at the Site. Therefore, PSC and Earthgrains formally request that ACEH and SFBRWQCB grant final case closure for the unauthorized release of diesel fuel at 955 Kennedy Street in Oakland, California (RO #0002569). This request is based on the Low-Threat UST Case Closure Policy, as well as under the Resolution No. 92-49.

If you have any questions concerning this document, please contact Paul Anderson at (618) 281-1543.

Respectfully,

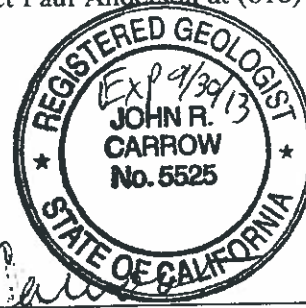
PSC INDUSTRIAL OUTSOURCING, LP



Paul Anderson
PSC Industrial Outsourcing, LP
Project Manager



John R. Carrow, PG
Professional Geologist, License # 5525



cc: Ms. Angela Westbrook – Earthgrains Baking Companies, Inc.
Ms. Kacey Fung – Earthgrains Baking Companies, Inc.
Mr. Christopher Wolfe – Earthgrains Baking Companies, Inc.
Mr. Kevin Graves – California State Water Resources Control Board
Mr. Pat Cullen – California UST Fund
GeoTracker & ACEH ftp site: <ftp://alcoftpl.acgov.org/>

ATTACHMENTS:

Attachment 1 – Site Specific Contact Information
Attachment 2 – Low-Threat Closure Policy Compliance Checklist
Attachment 3 – Summary Tables
Attachment 4 – Summary Figures
Attachment 5 – First Semi-Annual Groundwater Monitoring Report
Attachment 5A – Blaine Tech Services, Inc. (Field Report)
Attachment 5B – Kiff Analytical, LLC (Laboratory Report)
Attachment 6 – SWRCB UST Cleanup Fund (Second 5-Year Review Summary Report)

REFERENCES

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ACEH, 2007. Electronic Mail Correspondence Regarding Approval of Remedial Investigation Work Plan, RO #0002569, Earthgrains Baking Companies, Inc., 955 Kennedy Street, Oakland, CA 94606, April 4, 2007.

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ACEH, 2010a. Correspondence Regarding Tier 1 Risk Assessment and No Further Action Request Report (September 17, 2009), RO #0002569, Earthgrains Baking Companies, Inc., 955 Kennedy Street, Oakland, CA 94606, May 20, 2010.

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ATTACHMENT 1

SITE CONTACT INFORMATION

SITE CONTACT INFORMATION:

Site Location

Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606
Alameda County
Township 2 South, Range 3 West, Section 7
of the Mount Diablo Baseline and Meridian

Responsible Party

Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606
Angela Westbrook (510) 436-5350
Plant Manager
awestbrock@sl.bbumail.com

Environmental Consultant(s)

PSC Industrial Outsourcing, LP
210 West Sand Bank Road
Columbia, Illinois 62236
Paul Anderson (618) 281-1543
Project Manager
Paul.anderson@pscnow.com

John Carrow, P.G (618) 792-2468
Professional Geologist

Regulatory Agency

Alameda County Department of Environmental Health
Local Oversight Program
1131 Harbor Bay Parkway
Alameda, California 94502-6577
Dilan Roe (510) 337-9335
LOP Supervisor, Hazardous Materials Specialist
dilan.roe@acgov.org

ATTACHMENT 2

LOW-THREAT UST CLOSURE POLICY

COMPLIANCE CHECKLIST

Site Name: Earthgrains Baking Companies, Inc.
 Site Address: 955 Kennedy Street, Oakland, CA 94606

Site meets the criteria of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.¹

<p><u>General Criteria</u> General criteria that must be satisfied by all candidate sites:</p> <p>Is the unauthorized release located within the service area of a public water system?</p> <p>Does the unauthorized release consist only of petroleum?</p> <p>Has the unauthorized (“primary”) release from the UST system been stopped?</p> <p>Has free product been removed to the maximum extent practicable?</p> <p>Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?</p> <p>Has secondary source been removed to the extent practicable?</p> <p>Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?</p> <p>Does nuisance as defined by Water Code section 13050 exist at the site?</p> <p>Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><u>Media-Specific Criteria</u> Candidate sites must satisfy all three of these media-specific criteria:</p> <p>1. Groundwater: To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites:</p> <p>Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?</p> <p>Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites?</p> <p>If YES, check applicable class: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

¹ Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

Site Name: Earthgrains Baking Companies, Inc.
 Site Address: 955 Kennedy Street, Oakland, CA 94606

<p>For sites with releases that have not affected groundwater, do mobile constituents (leachate, vapors, or light non-aqueous phase liquids) contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>2. Petroleum Vapor Intrusion to Indoor Air: The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies.</p> <p>Is the site an active commercial petroleum fueling facility? Exception: Satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.</p> <p>a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4</p> <p>b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>3. Direct Contact and Outdoor Air Exposure: The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).</p> <p>a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?</p> <p>b. Are maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?</p> <p>c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

ATTACHMENT 3

TABLES

**Table 1
Well Construction Data**

**Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606**

Well ID	Well Installation Date	TOC Elevation ¹ (feet MSL)	Casing Material	Boring Depth (feet bgs)	Total Well Depth (feet bgs)	Total Well Depth (feet MSL)	Boring Diameter (inches)	Casing Diameter (inches)	Slot Size (inches)	Screened Interval (feet bgs)	Filter Pack Interval (feet bgs)	Filter Pack Sand
MW-101	1/19/2009	13.90	PVC	28.10	28.05	-14.15	8	2	0.010	18-28	16-28	#2/12
MW-102	1/20/2009	14.19	PVC	28.40	28.35	-14.16	8	2	0.010	18-28	16-28	#2/12
MW-103	1/19/2009	13.75	PVC	25.00	24.92	-11.17	8	2	0.010	10-25	8-25	#2/12
MW-104	1/20/2009	13.65	PVC	25.15	25.10	-11.45	8	2	0.010	10-25	8-25	#2/12

Notes:

TOC = top of well casing

1 = well casing elevations surveyed according to NAVD88 datum by PLS Surveys, Inc. on January 28, 2009.

MSL = mean sea level

bgs = below-ground-surface

PVC = polyvinyl chloride (Schedule 40)

**Table 2
Groundwater Elevation Data**

**Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606**

Well ID	Measurement Date	Well TOC Elevation (feet MSL)¹	Depth to Water From TOC (feet bgs)	Groundwater Elevation (feet MSL)	Total Well Depth (feet bgs)	Total Well Depth (feet MSL)
MW-101	1/26/2009	13.90	8.92	4.98	28.05	-14.15
	4/15/2009	13.90	9.43	4.47	27.85	-13.95
	7/22/2009	13.90	9.62	4.28	27.81	-13.91
	1/28/2010	13.90	7.68	6.22	27.80	-13.90
	8/24/2010	13.90	9.50	4.40	27.70	-13.80
	12/10/2010	13.90	7.68	6.22	27.91	-14.01
	2/02/2011	13.90	8.56	5.34	27.90	-14.00
	7/26/2011	13.90	9.12	4.78	27.85	-13.95
	1/06/2012	13.90	9.10	4.80	27.87	-13.97
	7/17/2012	13.90	9.50	4.40	27.83	-13.93
	3/26/2013	13.90	9.45	4.45	27.85	-13.95
MW-102	1/26/2009	14.19	9.15	5.04	28.35	-14.16
	4/15/2009	14.19	9.55	4.64	28.21	-14.02
	7/22/2009	14.19	10.02	4.17	28.19	-14.00
	1/28/2010	14.19	9.70	4.49	28.15	-13.96
	8/24/2010	14.19	9.75	4.44	28.15	-13.96
	12/10/2010	14.19	8.16	6.03	28.27	-14.08
	2/02/2011	14.19	9.37	4.82	28.28	-14.09
	7/26/2011	14.19	9.55	4.64	28.14	-13.95
	1/06/2012	14.19	11.31	2.88	28.22	-14.03
	7/17/2012	14.19	10.47	3.72	28.15	-13.96
	3/26/2013	14.19	11.68	2.51	28.13	-13.94
MW-103	1/26/2009	13.75	8.69	5.06	24.92	-11.17
	4/15/2009	13.75	8.91	4.84	24.74	-10.99
	7/22/2009	13.75	9.18	4.57	24.68	-10.93
	1/28/2010	13.75	7.75	6.00	24.65	-10.90
	8/24/2010	13.75	9.03	4.72	24.20	-10.45
	12/10/2010	13.75	7.67	6.08	24.80	-11.05
	2/02/2011	13.75	8.51	5.24	24.77	-11.02
	7/26/2011	13.75	8.84	4.91	24.70	-10.95
	1/06/2012	13.75	8.80	4.95	24.69	-10.94
	7/17/2012	13.75	9.10	4.65	24.70	-10.95
	3/26/2013	13.75	9.00	4.75	24.70	-10.95

Table 2
Groundwater Elevation Data

Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606

Well ID	Measurement Date	Well TOC Elevation (feet MSL) ¹	Depth to Water From TOC (feet bgs)	Groundwater Elevation (feet MSL)	Total Well Depth (feet bgs)	Total Well Depth (feet MSL)
MW-104	1/26/2009	13.65	8.65	5.00	25.00	-11.35
	4/15/2009	13.65	8.87	4.78	24.90	-11.25
	7/22/2009	13.65	9.27	4.38	24.91	-11.26
	1/28/2010	13.65	8.02	5.63	24.90	-11.25
	8/24/2010	13.65	9.00	4.65	24.69	-11.04
	12/10/2010	13.65	7.60	6.05	24.40	-10.75
	2/02/2011	13.65	8.38	5.27	24.94	-11.29
	7/26/2011	13.65	8.84	4.81	24.86	-11.21
	1/06/2012	13.65	8.72	4.93	24.69	-11.04
	7/17/2012	13.65	9.10	4.55	24.85	-11.20
	3/26/2013	13.65	9.05	4.60	24.85	-11.20
DW-1	1/26/2009	14.05	9.10	4.95	14.60	-0.55
	4/15/2009	14.05	9.23	4.82	14.41	-0.36
	7/22/2009	14.05	9.50	4.55	14.41	-0.36
	1/28/2010	14.05	7.84	6.21	NM	NM
	8/24/2010	14.05	9.00	5.05	14.25	-0.20
	Well permanently destroyed / removed during source area removal activities					

Notes:

TOC = top of well casing

1 = well casing elevations surveyed according to NAVD88 datum by PLS Surveys, Inc. on January 28, 2009.

MSL = mean sea level

bgs = below-ground-surface

NM = not measured

DW-1 = de-watering well

Table 3
Groundwater Analytical Data
(BTEX and TPH-d)

Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606

Well ID	Sample Collection Date	Parameter Concentration and Associated ESLs (µg/L)				
		Benzene (46)	Toluene (130)	Ethylbenzene (43)	Total Xylenes (100)	TPH-d (210)
MW-101	1/26/2009	<0.50	<0.50	<0.50	<0.50	<50
	4/15/2009	<0.50	<0.50	<0.50	<0.50	<50
	7/22/2009	<0.50	<0.50	<0.50	<0.50	<50
	1/28/2010	<0.50	<0.50	<0.50	<0.50	64
	8/24/2010	<0.50	<0.50	<0.50	<0.50	110
	12/10/2010	<0.50	<0.50	<0.50	<0.50	86
	2/02/2011	<0.50	<0.50	<0.50	<0.50	61
	7/26/2011	<0.50	<0.50	<0.50	<0.50	60
	1/06/2012	<0.50	<0.50	<0.50	<0.50	100
	7/17/2012	<0.50	<0.50	<0.50	<0.50	190
	3/26/2013	<0.50	<0.50	<0.50	<0.50	160
MW-102	1/26/2009	<0.50	<0.50	<0.50	<0.50	160
	4/15/2009	<0.50	<0.50	<0.50	<0.50	140
	7/22/2009	<0.50	<0.50	<0.50	<0.50	120
	1/28/2010	<0.50	<0.50	<0.50	<0.50	54
	8/24/2010	<0.50	<0.50	<0.50	<0.50	89
	12/10/2010	<0.50	<0.50	<0.50	<0.50	160
	2/02/2011	<0.50	<0.50	<0.50	<0.50	110
	7/26/2011	<0.50	<0.50	<0.50	<0.50	97
	1/06/2012	<0.50	<0.50	<0.50	<0.50	250
	7/17/2012	<0.50	<0.50	<0.50	<0.50	120
	3/26/2013	<0.50	<0.50	<0.50	<0.50	110
MW-103	1/26/2009	<0.50	<0.50	<0.50	<0.50	80
	4/15/2009	<0.50	<0.50	<0.50	<0.50	<50
	7/22/2009	<0.50	<0.50	<0.50	<0.50	<50
	1/28/2010	<0.50	<0.50	<0.50	<0.50	63
	8/24/2010	<0.50	<0.50	<0.50	<0.50	<50
	12/10/2010	<0.50	<0.50	<0.50	<0.50	<50
	2/02/2011	<0.50	<0.50	<0.50	<0.50	53
	7/26/2011	<0.50	<0.50	<0.50	<0.50	51
	1/06/2012	<0.50	<0.50	<0.50	<0.50	60
	7/17/2012	<0.50	<0.50	<0.50	<0.50	110
	3/26/2013	<0.50	<0.50	<0.50	<0.50	140
MW-104	1/26/2009	<0.50	<0.50	<0.50	<0.50	100
	4/15/2009	<0.50	<0.50	<0.50	<0.50	79
	7/22/2009	<0.50	<0.50	<0.50	<0.50	97
	1/28/2010	<0.50	<0.50	<0.50	<0.50	68
	8/24/2010	<0.50	<0.50	<0.50	<0.50	100
	12/10/2010	<0.50	<0.50	<0.50	<0.50	84
	2/02/2011	<0.50	<0.50	<0.50	<0.50	92

Table 3
Groundwater Analytical Data
(BTEX and TPH-d)

Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606

Well ID	Sample Collection Date	Parameter Concentration and Associated ESLs (µg/L)				
		Benzene (46)	Toluene (130)	Ethylbenzene (43)	Total Xylenes (100)	TPH-d (210)
MW-104	7/26/2011	<0.50	<0.50	<0.50	<0.50	100
	1/06/2012	<0.50	<0.50	<0.50	<0.50	79
	7/17/2012	<0.50	<0.50	<0.50	<0.50	72
	3/26/2013	<0.50	<0.50	<0.50	<0.50	99
DW-1	1/26/2009	<0.50	<0.50	<0.50	<0.50	1,200
	4/15/2009	<0.50	<0.50	<0.50	<0.50	830
	7/22/2009	<0.50	<0.50	<0.50	<0.50	1,000
	1/28/2010	NS	NS	NS	NS	NS
	8/24/2010	0.83	1.4	<0.50	1.0	970
	Well permanently destroyed / removed during source area removal activities					
DUP (DW-1)	1/26/2009	<0.50	<0.50	<0.50	<0.50	1,200
DUP (DW-1)	4/15/2009	<0.50	<0.50	<0.50	<0.50	960
DUP (DW-1)	7/22/2009	<0.50	<0.50	<0.50	<0.50	1,100
DUP (MW-102)	1/28/2010	<0.50	<0.50	<0.50	<0.50	<50
DUP (MW-102)	8/24/2010	<0.50	<0.50	<0.50	<0.50	140
DUP (MW-102)	12/10/2010	<0.50	<0.50	<0.50	<0.50	200
DUP (MW-102)	2/02/2011	<0.50	<0.50	<0.50	<0.50	120
DUP (MW-102)	7/26/2011	<0.50	<0.50	<0.50	<0.50	110
DUP (MW-102)	1/06/2012	<0.50	<0.50	<0.50	<0.50	110
DUP (MW-102)	7/17/2012	<0.50	<0.50	<0.50	<0.50	170
DUP (MW-102)	3/26/2013	<0.50	<0.50	<0.50	<0.50	130
Travel Blank	1/26/2009	<0.50	<0.50	<0.50	<0.50	-
	4/15/2009	<0.50	<0.50	<0.50	<0.50	-
	7/22/2009	<0.50	<0.50	<0.50	<0.50	-
	1/28/2010	<0.50	<0.50	<0.50	<0.50	-
	8/24/2010	<0.50	<0.50	<0.50	<0.50	-
	12/10/2010	<0.50	<0.50	<0.50	<0.50	-
	2/02/2011	<0.50	<0.50	<0.50	<0.50	-
	7/26/2011	<0.50	<0.50	<0.50	<0.50	-
	1/06/2012	<0.50	<0.50	<0.50	<0.50	-
	7/17/2012	<0.50	<0.50	<0.50	<0.50	-
	3/26/2013	<0.50	<0.50	<0.50	<0.50	-

Notes:

- µg/L = micrograms-per-liter
- ESL = environmental screening level according to ESL Document Table F-1b
- TPH-d = total petroleum hydrocarbons quantified as diesel
- DW = de-watering well
- DUP = field duplicate sample
- = Highlighted value exceeds ESL

Table 4
Groundwater Analytical Data
(Poly-Nuclear Aromatic Hydrocarbons)

Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606

Well ID	Sample Collection Date	Parameter Concentration and Associated ESLs (µg/L)															
		Naphthalene (24)	Acenaphthylene (30)	Acenaphthene (23)	Fluorene (39)	Phenanthrene (4,6)	Anthracene (0.73)	Fluoranthene (8.0)	Pyrene (2.0)	Benzo (a) Anthracene (0.027)	Chrysene (0.35)	Benzo (b) Fluoranthene (0.029)	Benzo (k) Fluoranthene (0.40)	Benzo (a) Pyrene (0.014)	Dibenz (a,h) Anthracene (0.25)	Benzo (g,h,i) Perylene (0.10)	Indeno (1,2,3-c,d) Pyrene (0.048)
MW-101	7/22/2009	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/02/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/06/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/17/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
3/26/2013	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0	
MW-102	7/22/2009	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/02/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/06/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/17/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
3/26/2013	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0	
MW-103	7/22/2009	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/02/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/06/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/17/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
3/26/2013	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0	
MW-104	7/22/2009	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/02/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/26/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/06/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	7/17/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
3/26/2013	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0	
DW-1	7/22/2009	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	1/28/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	8/24/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	12/10/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
	2/02/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
Well permanently destroyed / removed during source area removal activities																	
DUP (DW-1)	7/22/2009	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	1/28/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	8/24/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	12/10/2010	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	2/02/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	7/26/2011	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	1/06/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	7/17/2012	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0
DUP (MW-102)	3/26/2013	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<0.20	<1.0	<1.0	<1.0

Notes:
µg/L = micrograms-per-liter
ESL = environmental screening level according to ESL Document Table F-1b
TPH-d = total petroleum hydrocarbons quantified as diesel
DW = de-watering well
DUP = field duplicate sample
= Highlighted value exceeds ESL

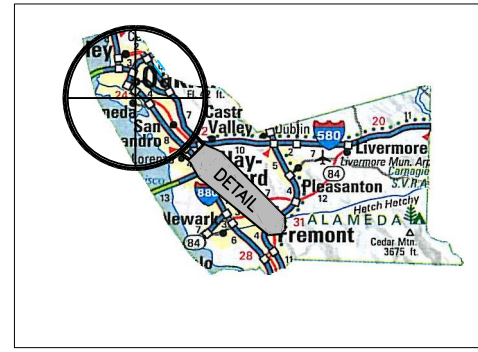
ATTACHMENT 4

FIGURES

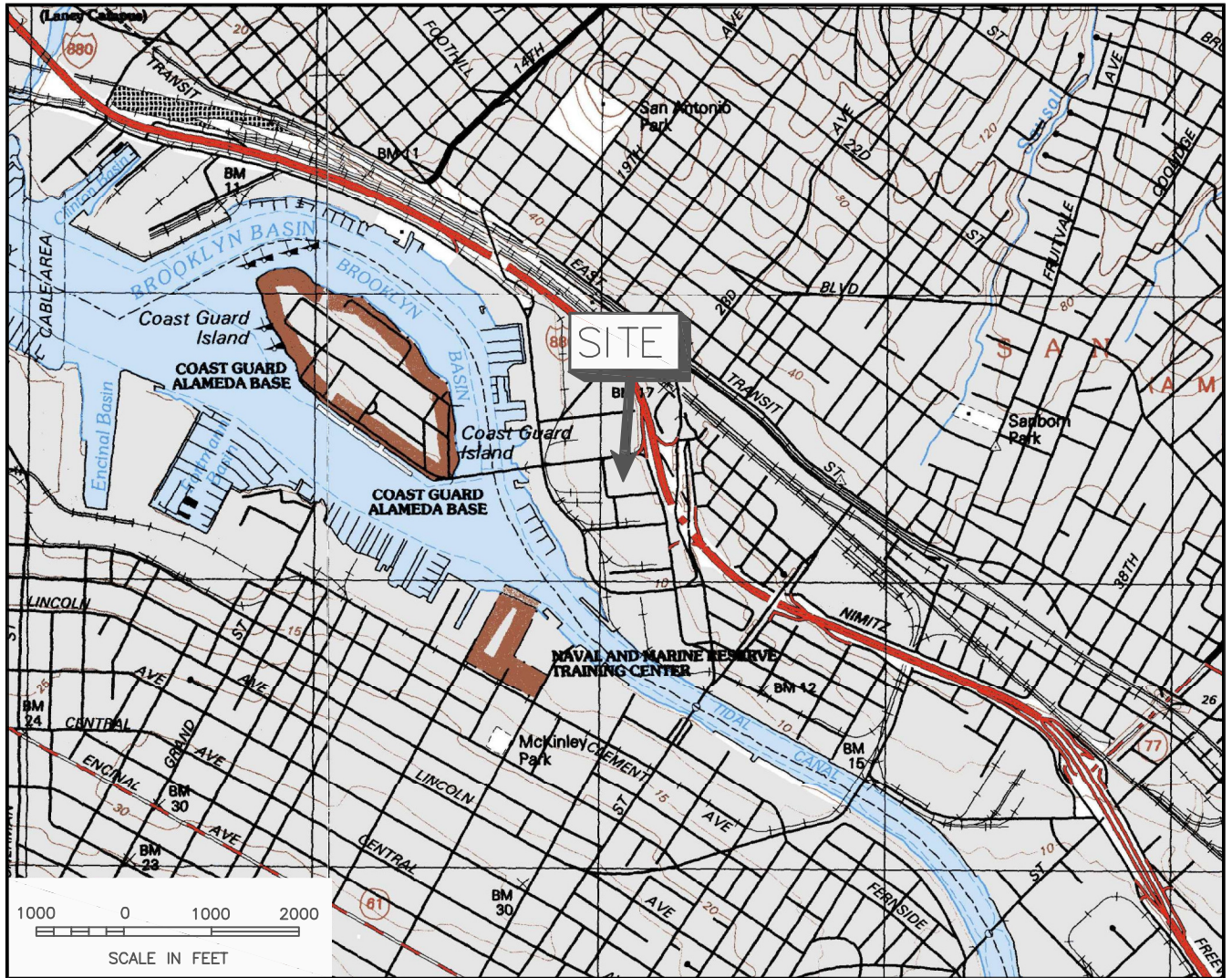
CALIFORNIA



ALAMEDA COUNTY



AREA IN DETAIL



Modified from U.S. Geological Survey, Oakland East & West, California, quadrangle, Photorevised 1997 & 1993.

SCALE IS VARIABLE



COL 624\02797C-002



TITLE:
 SITE LOCATION MAP
 955 KENNEDY STREET
 OAKLAND, CALIFORNIA 94606

DWN: TMM
 DES.: JRC
 CHKD:
 APPD:
 DATE: 11/18/08
 REV.: 0

PROJECT NO.: 62402797
 EARTHGRAINS
 OAKLAND, CALIFORNIA

FIGURE 1

KING STREET

4-INCH
SANITARY
SEWER
CUT AND
CAPPED

ABANDONED
SANITARY SEWER AND
AIR LINE
CUT AND CAPPED

BACKFILLED
SOURCE
AREA
REMOVAL
EXCAVATION

MW-102

MW-103

MW-104

MW-101

PLANT

LEGEND

⊕ MONITORING WELL LOCATION



TITLE:
MONITORING WELL LOCATION MAP
POST SOURCE REMOVAL

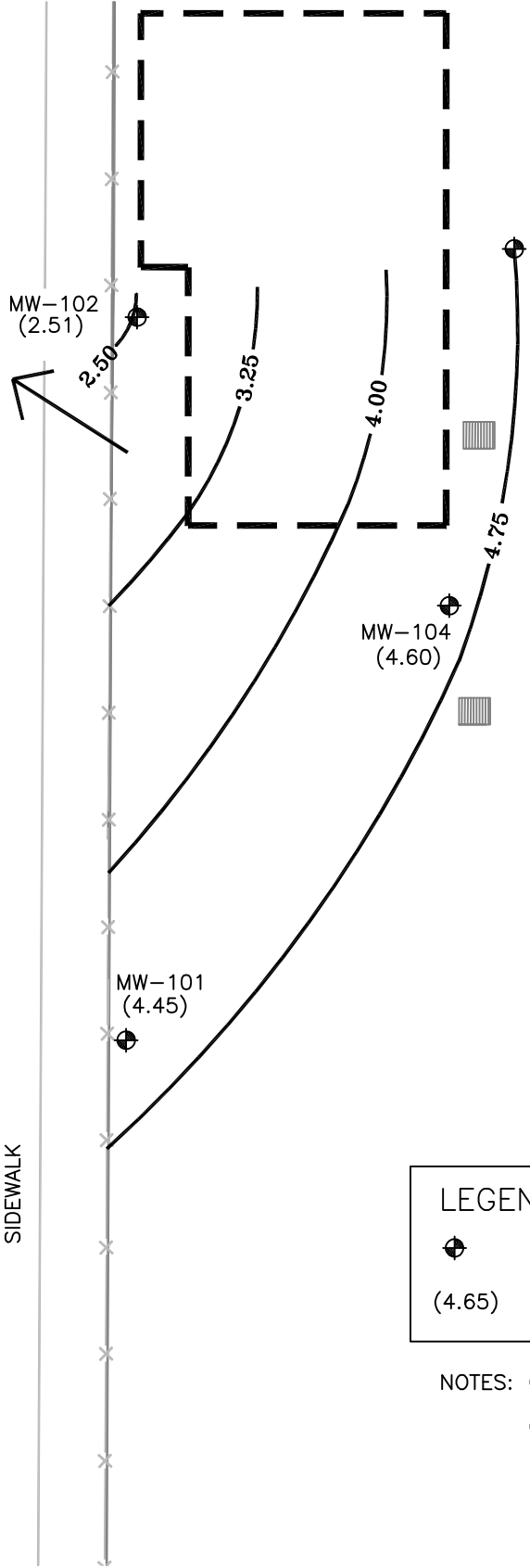
DWN: TMM	DES.: JRC
CHKD:	APPD:
DATE: 8/25/11	REV.: 0

PROJECT NO.: 62402797
EARTHGRAINS
OAKLAND, CALIFORNIA

FIGURE 2

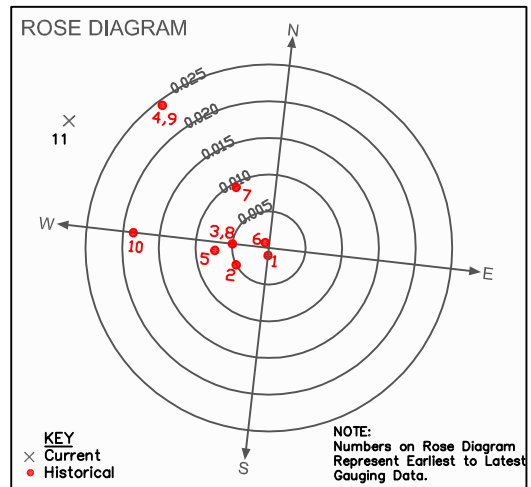
KING STREET

SIDEWALK



EVENT #	EVENT DATE
1	1/26/2009
2	4/15/2009
3	7/22/2009
4	1/28/2010
5	8/24/2010
6	12/10/2010
7	2/02/2011
8	7/26/2011
9	1/06/2012
10	7/17/2012
11	3/26/2013

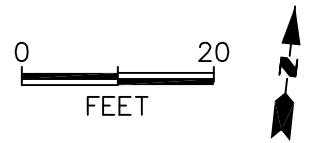
PLANT



LEGEND

- MONITORING WELL LOCATION
- (4.65) GROUNDWATER ELEVATION

NOTES: GROUNDWATER GRADIENT = 0.049 FT/FT
GROUNDWATER FLOW = WEST TO NORTHWEST



COL 624\02797B-037



TITLE:
GROUNDWATER ELEVATION
CONTOUR MAP
MARCH 26, 2013

DWN: MMK	DES.: PA
CHKD: PA	APPD: JC
DATE: 03/26/13	REV.: 0

PROJECT NO.: 62409080043
EARTHGRAINS
OAKLAND, CALIFORNIA

FIGURE 3

KING STREET

SIDEWALK

MW-102
(110/130)

MW-103
(140)


MW-104
(99)

MW-101
(160)

BACKFILLED
SOURCE
AREA
REMOVAL
EXCAVATION

PLANT

LEGEND

-  MONITORING WELL LOCATION
- (60) TPH-d CONCENTRATIONS IN GW (ug/L)

NOTE: MW-102 SHOWS CONCENTRATIONS FROM PRIMARY SAMPLE/DUPLICATE.



COL 624\02797B-036



TITLE:
TPH-d IN GROUNDWATER
CONCENTRATION MAP
MARCH 26, 2013

DWN: MMK	DES.: PA
CHKD: PA	APPD: JC
DATE: 03/26/13	REV.: 0

PROJECT NO.: 62409080043
EARTHGRAINS
OAKLAND, CALIFORNIA

FIGURE 4

ATTACHMENT 5

FIRST SEMI-ANNUAL GROUNDWATER MONITORING REPORT (MARCH 2013)

Current Groundwater Monitoring Event (First Semi-Annual – March 2013)

Blaine Tech Services, Inc. (BTS) performed the semi-annual groundwater-monitoring event on March 26, 2013. The BTS field documents generated during the event are included as Attachment 5A. Samples were submitted to Kiff Analytical, LLC (Kiff) for laboratory analysis. The laboratory report is included as Attachment 5B. The current groundwater monitoring activities are summarized below.

Summary of Monitoring Well Conditions – Wells MW-101 through MW-104 were inspected and no conditions requiring corrective actions were noted. The well vault for MW-104 contained water that accumulated from surface water runoff. The water was removed prior to opening the well caps. Well construction details are presented in Table 1. Total depth measurements are presented in Table 2.

Groundwater Elevation – Wells MW-101 through MW-104 were measured and groundwater elevations were calculated to range from 4.75 to 2.51 feet above mean sea level (msl). Free product was not observed in any of the wells during this or previous groundwater monitoring events. Groundwater elevations in wells MW-101, MW-103, and MW-104 were approximately 0.05 to 0.1 feet higher (shallower) for this event compared to the previous monitoring event. The groundwater level in well MW-102 was 1.2 feet deeper for this event compared to the previous monitoring event. Although, MW-2 was only 0.37 feet deeper than the first semi-annual event performed in 2012. Groundwater elevation measurements are presented on Table 2. Precipitation in the Oakland area for the July 1, 2012 through April 15, 2013 period (13.62 inches) was approximately 70% of expected normal. The same period for the previous year (14.74 inches) was at 76% of the current calculated normal precipitation (19.36 inches), as reported by the National Oceanic and Atmospheric Administration.

It is PSC's opinion that the reduced precipitation from July 2012 through April 15, 2013 resulted in a decreased hydraulic head from infiltrating surface water in the compacted backfilled excavation. This decreased head along with the absence of saturated permeable layers at shallow depths in MW-102 resulted in a lower (deeper) water level only observed in MW-102. This effect was not observed in the other monitoring wells located up gradient or cross gradient from the source area excavation. During this current event, the groundwater level in down gradient MW-102 is inconsistent with the other three wells.

Groundwater Flow Direction and Gradient – Based on historic groundwater measurements, groundwater generally flows to the west with seasonal variations to the southwest or northwest. Groundwater flow for the March 2013 event was towards the west to northwest. The approximate gradient during the March event was 0.049 foot-per-foot.

Contaminant Concentrations in Groundwater – The analytical results for all four wells contained TPH-d at concentrations ranging from 99 µg/L to 160 µg/L. MW-101,

MW-103, and MW-104 had concentrations of TPH-d at 160, 140, and 99 µg/L, respectively. Down-gradient well MW-102 had a TPH-d concentration of 110 µg/L. The duplicate sample collected from MW-102 had a concentration of 130 µg/L. All TPH-d concentrations were less than the environmental screening level (ESL) of 210 µg/L as identified in the San Francisco Bay Regional Water Quality Control Board document *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Revised May 2008, Table F-1b*.

BTEX were not detected in any of the samples collected for this or previous groundwater sampling events. PAHs were not detected in any of the samples collected during this or previous groundwater monitoring events. A summary of BTEX and TPH-d laboratory results are presented on Table 3. A summary of PAH laboratory results are presented on Table 4.

Planned Activities – As of submission of this Low-Threat Closure Report request, PSC will not be performing subsequent semi-annual groundwater monitoring until further notice based on California State Assembly Bill Number 1715, Chapter 237, as approved by the Governor and filed with the Secretary of State on September 7, 2012. Assuming the Closure Request is approved, PSC plans on submitting a Well Destruction Work Plan upon receiving Closure approval.

ATTACHMENT 5A

BLAINE TECH SERVICES, INC.

FIELD REPORT

WELL GAUGING DATA

Project # 130326-001 Date 3/26/13 Client PSC

Site 955 Kennedy St., Oakland CA

Well ID	Time	Well Size (in.)	Sheen / Odor	Depth to Immiscible Liquid (ft.)	Thickness of Immiscible Liquid (ft.)	Volume of Immiscibles Removed (ml)	Depth to water (ft.)	Depth to well bottom (ft.)	Survey Point: TOB or <u>TOC</u>	Notes
MW-101	1227	2					9.45	27.85	↓	
MW-102	1211	2				11.68	28.13			
MW-103	1219	2				9.00	24.70			
MW-104	1215	2				9.05	24.85			

WELLHEAD INSPECTION CHECKLIST

Client PSC Date 3/26/13
 Site Address 955 Kennedy St., Oakland CA
 Job Number 130326-DW3 Technician Daniel Allen

Well ID	Well Inspected - No Corrective Action Required	Water Bailed From Wellbox	Wellbox Components Cleaned	Cap Replaced	Lock Replaced	Other Action Taken (explain below)	Well Not Inspected (explain below)	Repair Order Submitted
MW-101	X							
MW-102	X							
MW-103	X							
MW-104	X	X						

NOTES: _____

WELL MONITORING DATA SHEET

Project #: <u>130326-DW1</u>	Client: <u>PSC</u>
Sampler: <u>DW</u>	Date: <u>3/26/13</u>
Well I.D.: <u>MW-101</u>	Well Diameter: <u>(2)</u> 3 4 6 8
Total Well Depth (TD): <u>27.85</u>	Depth to Water (DTW): <u>9.45</u>
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: <u>(PVC)</u> Grade	D.O. Meter (if req'd): YSI HACH
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: <u>13.13</u>	

Purge Method: Bailer Waterra Sampling Method: Bailer
Disposable Bailer Peristaltic Disposable Bailer
 Positive Air Displacement Extraction Pump Extraction Port
 Electric Submersible Other _____ Dedicated Tubing

$3.0 \text{ (Gals.)} \times 3 = 9.0 \text{ Gals.}$ I Case Volume Specified Volumes Calculated Volume	<table border="1" style="width: 100%; border-collapse: collapse; font-size: small;"> <thead> <tr> <th>Well Diameter</th> <th>Multiplier</th> <th>Well Diameter</th> <th>Multiplier</th> </tr> </thead> <tbody> <tr> <td>1"</td> <td>0.04</td> <td>4"</td> <td>0.65</td> </tr> <tr> <td>2"</td> <td>0.16</td> <td>6"</td> <td>1.47</td> </tr> <tr> <td>3"</td> <td>0.37</td> <td>Other</td> <td>radius² * 0.163</td> </tr> </tbody> </table>	Well Diameter	Multiplier	Well Diameter	Multiplier	1"	0.04	4"	0.65	2"	0.16	6"	1.47	3"	0.37	Other	radius ² * 0.163
Well Diameter	Multiplier	Well Diameter	Multiplier														
1"	0.04	4"	0.65														
2"	0.16	6"	1.47														
3"	0.37	Other	radius ² * 0.163														

Time	Temp (°F or °C)	pH	Cond. (mS or μS)	Turbidity (NTUs)	Gals. Removed	Observations
1427	20.0	6.95	1227	57	3.0	
1431	20.1	6.73	1203	69	6.0	
1436	20.1	6.70	1195	75	9.0	

Did well dewater? Yes (No) Gallons actually evacuated: 9.0

Sampling Date: 3/26/13 Sampling Time: 1440 Depth to Water: 11.51

Sample I.D.: MW-101 Laboratory: (Kiff) CalScience Other _____

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: SEE COC

EB I.D. (if applicable): @ Time Duplicate I.D. (if applicable):

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other:

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
------------------	------------	------	-------------	------

O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV
--------------------	------------	----	-------------	----

WELL MONITORING DATA SHEET

Project #: 130326-DW1	Client: PSC
Sampler: DW	Date: 3/26/13
Well I.D.: MW-102	Well Diameter: (2) 3 4 6 8
Total Well Depth (TD): 28.13	Depth to Water (DTW): 11.68
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: PVC Grade	D.O. Meter (if req'd): YSI HACH
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: 14.97	

Purge Method: Bailer Waterra Sampling Method: Bailer
 ~~Disposable Bailer~~ Peristaltic ~~Disposable Bailer~~
 Positive Air Displacement Extraction Pump Extraction Port
 Electric Submersible Other _____ Dedicated Tubing

Other: _____

$2.6 \text{ (Gals.)} \times 3 = 7.8 \text{ Gals.}$ <p>1 Case Volume Specified Volumes Calculated Volume</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Well Diameter</th> <th>Multiplier</th> <th>Well Diameter</th> <th>Multiplier</th> </tr> </thead> <tbody> <tr> <td>1"</td> <td>0.04</td> <td>4"</td> <td>0.65</td> </tr> <tr> <td>2"</td> <td>0.16</td> <td>6"</td> <td>1.47</td> </tr> <tr> <td>3"</td> <td>0.37</td> <td>Other</td> <td>radius² * 0.163</td> </tr> </tbody> </table>	Well Diameter	Multiplier	Well Diameter	Multiplier	1"	0.04	4"	0.65	2"	0.16	6"	1.47	3"	0.37	Other	radius ² * 0.163
Well Diameter	Multiplier	Well Diameter	Multiplier														
1"	0.04	4"	0.65														
2"	0.16	6"	1.47														
3"	0.37	Other	radius ² * 0.163														

Time	Temp (°F or °C)	pH	Cond. (mS or μS)	Turbidity (NTUs)	Gals. Removed	Observations
1246	19.7	6.83	1418	355	2.6	
1252	19.5	6.69	1422	385	5.2	
1258	19.7	6.74	1397	804	7.8	

Did well dewater? Yes No Gallons actually evacuated: 7.8

Sampling Date: 3/26/13 Sampling Time: 1310 Depth to Water: 14.00

Sample I.D.: MW-102 Laboratory: Kiff CalScience Other _____

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: SEE CGC

EB I.D. (if applicable): @ _____ Time Duplicate I.D. (if applicable): MW-102 Duplicate @ 1320

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: _____

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV

WELL MONITORING DATA SHEET

Project #: <u>130326-DW1</u>	Client: <u>PSC</u>
Sampler: <u>DW</u>	Date: <u>3/26/13</u>
Well I.D.: <u>MW-103</u>	Well Diameter: <u>(2)</u> 3 4 6 8 _____
Total Well Depth (TD): <u>24.70</u>	Depth to Water (DTW): <u>9.00</u>
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: <u>PVC</u> Grade	D.O. Meter (if req'd): YSI HACH
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: <u>12.14</u>	

Purge Method: <u>Bailer</u> <input checked="" type="radio"/> <u>Disposable Bailer</u> <input type="radio"/> Positive Air Displacement <input type="radio"/> Electric Submersible	Water: <u>Peristaltic</u> <input type="radio"/> Peristaltic <input type="radio"/> Extraction Pump <input type="radio"/> Other _____	Sampling Method: <u>Bailer</u> <input checked="" type="radio"/> <u>Disposable Bailer</u> <input type="radio"/> Extraction Port <input type="radio"/> Dedicated Tubing Other: _____
---	--	--

2.5 (Gals.) X 3 = 7.5 Gals.
 1 Case Volume Specified Volumes Calculated Volume

Well Diameter	Multiplier	Well Diameter	Multiplier
1"	0.04	4"	0.65
2"	0.16	6"	1.47
3"	0.37	Other	radius ² * 0.163

Time	Temp (°F or °C)	pH	Cond. (mS or µS)	Turbidity (NTUs)	Gals. Removed	Observations
<u>1340</u>	<u>20.0</u>	<u>7.14</u>	<u>862.2</u>	<u>71000</u>	<u>2.5</u>	
<u>1345</u>	<u>20.1</u>	<u>6.91</u>	<u>837.5</u>	<u>71000</u>	<u>5.0</u>	
<u>1348</u>	<u>20.1</u>	<u>6.87</u>	<u>829.6</u>	<u>71000</u>	<u>7.5</u>	

Did well dewater? Yes No Gallons actually evacuated: 7.5

Sampling Date: 3/26/13 Sampling Time: 1350 Depth to Water: 9.28

Sample I.D.: MW-103 Laboratory: Kiff CalScience Other _____

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: SFE COC

EB I.D. (if applicable): _____ @ _____ Time Duplicate I.D. (if applicable): _____

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: _____

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
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O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV
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WELL MONITORING DATA SHEET

Project #: <u>30326-DW1</u>	Client: <u>PSC</u>
Sampler: <u>DW</u>	Date: <u>3/26/13</u>
Well I.D.: <u>MW-104</u>	Well Diameter: <u>2</u> 3 4 6 8
Total Well Depth (TD): <u>24.85</u>	Depth to Water (DTW): <u>9.65</u>
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: <u>PVC</u> Grade	D.O. Meter (if req'd): YSI HACH
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: <u>12.21</u>	

Purge Method: <u>Bailer</u> <input checked="" type="radio"/> Disposable Bailer <input type="radio"/> Positive Air Displacement <input type="radio"/> Electric Submersible	Waterra <input type="radio"/> Peristaltic <input type="radio"/> Extraction Pump Other _____	Sampling Method: <u>Bailer</u> <input checked="" type="radio"/> Disposable Bailer <input type="radio"/> Extraction Port <input type="radio"/> Dedicated Tubing Other: _____
--	--	---

<u>2.5</u> (Gals.) X	<u>3</u>	= <u>7.5</u> Gals.
1 Case Volume	Specified Volumes	Calculated Volume

Well Diameter	Multiplier	Well Diameter	Multiplier
1"	0.04	4"	0.65
2"	0.16	6"	1.47
3"	0.37	Other	radius ² * 0.163

Time	Temp (°F or °C)	pH	Cond. (mS or µS)	Turbidity (NTUs)	Gals. Removed	Observations
1406	18.2	6.84	591.4	71000	2.5	
1409	18.2	6.69	672.0	71000	5.0	
1412	18.3	6.65	685.3	71000	7.5	

Did well dewater? Yes No Gallons actually evacuated: 7.5

Sampling Date: 3/26/13 Sampling Time: 1415 Depth to Water: 9.39

Sample I.D.: MW-104 Laboratory: Kiff CalScience Other _____

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: SEE CCC

EB I.D. (if applicable): _____ @ _____ Time Duplicate I.D. (if applicable): _____

Analyzed for: TPH-G BTEX MTBE TPH-D Oxygenates (5) Other: _____

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV

BLAINE

TECH SERVICES, INC.

1680 ROGERS AVENUE
 SAN JOSE, CALIFORNIA 95112-1105
 FAX (408) 573-7771
 PHONE (408) 573-0555

CONDUCT ANALYSIS TO DETECT									
BTEX (8260B)	TPH-d (8015M)	PAH's (8310)							
X	X	X							
X	X	X							
X	X	X							
X	X	X							
X	X	X							
X									

LAB KIFF DHS # _____
 ALL ANALYSES MUST MEET SPECIFICATIONS AND DETECTION LIMITS SET BY CALIFORNIA DHS AND
 EPA RWQCB REGION _____
 LIA
 OTHER

CHAIN OF CUSTODY
 BTS # 130326-DW3

CLIENT PSC

SITE Earthgrains Baking Companies, Inc.
955 Kennedy St.
Oakland, CA

C = COMPOSITE ALL CONTAINERS

SPECIAL INSTRUCTIONS
 Invoice & Report to: PSC Attn: Paul Anderson
 210 West Sand Bank Rd. Columbia, IL 62236
 PSC Project # Confirm w/Paul Anderson
panderson@pscnow.com
 Ph. 618-281-1543

SAMPLE I.D.	DATE	TIME	MATRIX S=SOIL W=H ₂ O	CONTAINERS TOTAL							ADD'L INFORMATION	STATUS	CONDITION	LAB SAMPLE #
MW-101	3/26/13	1440	W	7										-01
MW-102		1310												-02
MW-103		1350												003
MW-104		1415												-04
MW-102 POP		1320												-05
TB		1205		2										-06

SAMPLING COMPLETED 3/26/13 1440 SAMPLING PERFORMED BY Daniel Allen RESULTS NEEDED NO LATER THAN Standard TAT

RELEASED BY [Signature] DATE 3/26/13 TIME 1620 RECEIVED BY [Signature] DATE 3/26/13 TIME 1620

RELEASED BY [Signature] DATE 3/28/13 TIME 1155 RECEIVED BY [Signature] DATE 032813 TIME 1217

SHIPPED VIA _____ DATE SENT _____ TIME SENT _____ COOLER # _____

TEST EQUIPMENT CALIBRATION LOG

PROJECT NAME <i>PSC @ Earth grains</i>				PROJECT NUMBER <i>130326-DW3</i>			
EQUIPMENT NAME	EQUIPMENT NUMBER	DATE/TIME OF TEST	STANDARDS USED	EQUIPMENT READING	CALIBRATED TO: OR WITHIN 10%:	TEMP. C°	INITIALS
<i>ultraviolet</i>	<i>6212898</i>	<i>3/24/13 @ 1205</i>	<i>ph 7.00 10.00 4.00</i>	<i>7.00 10.00 4.00</i>	<i>Yes</i>	<i>18</i>	<i>DW</i>
			<i>3900 us/cm</i>	<i>3900</i>	<i>Yes</i>	<i>18</i>	<i>DW</i>

17

10

ATTACHMENT 5B

KIFF ANALYTICAL, LLC

LABORATORY REPORT



Laboratory Results

Paul Anderson
Philip Services Corp
210 W Sand Bank Road
Columbia, IL 62236

Subject : 6 Water Samples
Project Name : Earthgrains Baking Companies, Inc.
Project Number : 130326-DW3
P.O. Number : 10000202861

Dear Mr. Anderson,

Chemical analysis of the samples referenced above has been completed. Summaries of the data are contained on the following pages. Sample(s) were received under documented chain-of-custody. US EPA protocols for sample storage and preservation were followed. Testing procedures comply with the 2003 NELAC and TNI 2009 standards. Laboratory results relate only to the samples tested. This report may be freely reproduced in full, but may only be reproduced in part with the express permission of Kiff Analytical, LLC. Kiff Analytical, LLC is certified by the State of California under the National Environmental Laboratory Accreditation Program (NELAP), lab # 08263CA. If you have any questions regarding procedures or results, please call me at 530-297-4800.

Sincerely,

Troy Turpen

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Sample : **MW-101**

Matrix : Water

Lab Number : 84464-01

Sample Date :03/26/2013

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 16:59
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 16:59
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 16:59
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 16:59
1,2-Dichloroethane-d4 (Surr)	101		% Recovery	EPA 8260B	04/02/13 16:59
Toluene - d8 (Surr)	99.9		% Recovery	EPA 8260B	04/02/13 16:59
TPH as Diesel	160	50	ug/L	M EPA 8015	04/05/13 10:12
Octacosane (Diesel Surrogate)	103		% Recovery	M EPA 8015	04/05/13 10:12

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Sample : **MW-102**

Matrix : Water

Lab Number : 84464-02

Sample Date :03/26/2013

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:33
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:33
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:33
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:33
1,2-Dichloroethane-d4 (Surr)	101		% Recovery	EPA 8260B	04/02/13 17:33
Toluene - d8 (Surr)	100		% Recovery	EPA 8260B	04/02/13 17:33
TPH as Diesel	110	50	ug/L	M EPA 8015	04/05/13 10:46
Octacosane (Diesel Surrogate)	97.3		% Recovery	M EPA 8015	04/05/13 10:46

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Sample : **MW-103**

Matrix : Water

Lab Number : 84464-03

Sample Date :03/26/2013

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:34
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:34
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:34
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 17:34
1,2-Dichloroethane-d4 (Surr)	97.9		% Recovery	EPA 8260B	04/02/13 17:34
Toluene - d8 (Surr)	111		% Recovery	EPA 8260B	04/02/13 17:34
TPH as Diesel	140	50	ug/L	M EPA 8015	04/05/13 11:21
(Note: Discrete peaks in Diesel range, atypical for Diesel Fuel.)					
Octacosane (Diesel Surrogate)	104		% Recovery	M EPA 8015	04/05/13 11:21

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Sample : **MW-104**

Matrix : Water

Lab Number : 84464-04

Sample Date :03/26/2013

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:18
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:18
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:18
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:18
1,2-Dichloroethane-d4 (Surr)	98.8		% Recovery	EPA 8260B	04/02/13 09:18
Toluene - d8 (Surr)	103		% Recovery	EPA 8260B	04/02/13 09:18
TPH as Diesel	99	50	ug/L	M EPA 8015	04/05/13 11:56
Octacosane (Diesel Surrogate)	95.4		% Recovery	M EPA 8015	04/05/13 11:56

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Sample : **MW-102 DUP**

Matrix : Water

Lab Number : 84464-05

Sample Date :03/26/2013

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:40
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:40
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:40
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 09:40
1,2-Dichloroethane-d4 (Surr)	97.4		% Recovery	EPA 8260B	04/02/13 09:40
Toluene - d8 (Surr)	109		% Recovery	EPA 8260B	04/02/13 09:40
TPH as Diesel	130	50	ug/L	M EPA 8015	04/05/13 12:31
Octacosane (Diesel Surrogate)	102		% Recovery	M EPA 8015	04/05/13 12:31

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Sample : **TB**

Matrix : Water

Lab Number : 84464-06

Sample Date :03/26/2013

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date/Time Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 21:41
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 21:41
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 21:41
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/13 21:41
1,2-Dichloroethane-d4 (Surr)	98.6		% Recovery	EPA 8260B	04/02/13 21:41
Toluene - d8 (Surr)	98.7		% Recovery	EPA 8260B	04/02/13 21:41

Report Number : 84464

Date : 04/05/2013

QC Report : Method Blank Data

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed	Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
TPH as Diesel	< 0.50	50	ug/L	M EPA 8015	04/04/2013	Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013
Octacosane (Diesel Surrogate)	88.5		%	M EPA 8015	04/04/2013	Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013	Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013	Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013	1,2-Dichloroethane-d4 (Surr)	100		%	EPA 8260B	04/02/2013
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013	Toluene - d8 (Surr)	99.8		%	EPA 8260B	04/02/2013
1,2-Dichloroethane-d4 (Surr)	100		%	EPA 8260B	04/02/2013						
Toluene - d8 (Surr)	99.6		%	EPA 8260B	04/02/2013						
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
1,2-Dichloroethane-d4 (Surr)	101		%	EPA 8260B	04/02/2013						
Toluene - d8 (Surr)	102		%	EPA 8260B	04/02/2013						
Benzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
Toluene	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	04/02/2013						
1,2-Dichloroethane-d4 (Surr)	99.5		%	EPA 8260B	04/02/2013						
Toluene - d8 (Surr)	111		%	EPA 8260B	04/02/2013						

QC Report : Matrix Spike/ Matrix Spike Duplicate

Project Name : **Earthgrains Baking Companies, Inc.**Project Number : **130326-DW3**

Parameter	Spiked Sample	Sample Value	Spike Level	Spike Dup. Level	Spiked Sample Value	Duplicate Spiked Sample Value	Units	Analysis Method	Date Analyzed	Spiked Sample Percent Recov.	Duplicate Spiked Sample Percent Recov.	Relative Percent Diff.	Spiked Sample Percent Recov. Limit	Relative Percent Diff. Limit
Benzene	84510-03	<0.50	40.0	40.0	36.0	35.7	ug/L	EPA 8260B	4/2/13	89.9	89.2	0.837	80-120	25
Ethylbenzene	84510-03	<0.50	40.0	40.0	37.1	36.8	ug/L	EPA 8260B	4/2/13	92.8	91.9	1.00	80-120	25
P + M Xylene	84510-03	<0.50	40.0	40.0	36.6	36.1	ug/L	EPA 8260B	4/2/13	91.5	90.3	1.30	76.8-120	25
Toluene	84510-03	<0.50	40.0	40.0	37.0	36.7	ug/L	EPA 8260B	4/2/13	92.4	91.8	0.659	80-120	25
Benzene	84464-04	<0.50	40.0	40.0	37.3	37.2	ug/L	EPA 8260B	4/2/13	93.3	93.1	0.223	80-120	25
Ethylbenzene	84464-04	<0.50	40.0	40.0	39.9	39.5	ug/L	EPA 8260B	4/2/13	99.8	98.6	1.19	80-120	25
P + M Xylene	84464-04	<0.50	40.0	40.0	39.9	39.1	ug/L	EPA 8260B	4/2/13	99.8	97.7	2.15	76.8-120	25
Toluene	84464-04	<0.50	40.0	40.0	39.8	39.2	ug/L	EPA 8260B	4/2/13	99.4	98.0	1.42	80-120	25
Benzene	84464-05	<0.50	40.0	40.0	40.1	39.0	ug/L	EPA 8260B	4/2/13	100	97.5	2.90	80-120	25

QC Report : Matrix Spike/ Matrix Spike Duplicate

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Parameter	Spiked Sample	Sample Value	Spike Level	Spike Dup. Level	Spiked Sample Value	Duplicate Spiked Sample Value	Units	Analysis Method	Date Analyzed	Spiked Sample Percent Recov.	Duplicate Spiked Sample Percent Recov.	Relative Percent Diff.	Spiked Sample Percent Recov. Limit	Relative Percent Diff. Limit
Ethylbenzene	84464-05	<0.50	40.0	40.0	42.6	41.5	ug/L	EPA 8260B	4/2/13	106	104	2.76	80-120	25
P + M Xylene	84464-05	<0.50	40.0	40.0	41.9	41.0	ug/L	EPA 8260B	4/2/13	105	102	2.32	76.8-120	25
Toluene	84464-05	<0.50	40.0	40.0	47.3	46.2	ug/L	EPA 8260B	4/2/13	118	115	2.52	80-120	25
Benzene	84482-01	<0.50	40.0	40.0	38.9	37.9	ug/L	EPA 8260B	4/2/13	97.4	94.8	2.70	80-120	25
Ethylbenzene	84482-01	<0.50	40.0	40.0	40.3	39.2	ug/L	EPA 8260B	4/2/13	101	97.9	2.81	80-120	25
P + M Xylene	84482-01	<0.50	40.0	40.0	40.0	39.4	ug/L	EPA 8260B	4/2/13	100	98.4	1.71	76.8-120	25
Toluene	84482-01	<0.50	40.0	40.0	39.8	38.6	ug/L	EPA 8260B	4/2/13	99.4	96.4	3.08	80-120	25
TPH as Diesel	BLANK	<50	1000	1000	984	974	ug/L	M EPA 8015	4/4/13	98.4	97.4	1.01	70-130	25

QC Report : Laboratory Control Sample (LCS)

Project Name : **Earthgrains Baking Companies, Inc.**

Project Number : **130326-DW3**

Parameter	Spike Level	Units	Analysis Method	Date Analyzed	LCS Percent Recov.	LCS Percent Recov. Limit
Benzene	39.8	ug/L	EPA 8260B	4/2/13	89.8	80-120
Ethylbenzene	39.8	ug/L	EPA 8260B	4/2/13	92.4	80-120
P + M Xylene	39.8	ug/L	EPA 8260B	4/2/13	90.1	76.8-120
Toluene	39.8	ug/L	EPA 8260B	4/2/13	92.0	80-120
Benzene	39.8	ug/L	EPA 8260B	4/2/13	94.3	80-120
Ethylbenzene	39.8	ug/L	EPA 8260B	4/2/13	99.6	80-120
P + M Xylene	39.8	ug/L	EPA 8260B	4/2/13	98.6	76.8-120
Toluene	39.8	ug/L	EPA 8260B	4/2/13	100	80-120
Benzene	39.8	ug/L	EPA 8260B	4/2/13	97.1	80-120
Ethylbenzene	39.8	ug/L	EPA 8260B	4/2/13	103	80-120
P + M Xylene	39.8	ug/L	EPA 8260B	4/2/13	103	76.8-120
Toluene	39.8	ug/L	EPA 8260B	4/2/13	114	80-120
Benzene	40.2	ug/L	EPA 8260B	4/2/13	96.9	80-120
Ethylbenzene	40.2	ug/L	EPA 8260B	4/2/13	101	80-120
P + M Xylene	40.2	ug/L	EPA 8260B	4/2/13	101	76.8-120
Toluene	40.2	ug/L	EPA 8260B	4/2/13	99.6	80-120

BLAINE

TECH SERVICES, INC.

1680 ROGERS AVENUE
SAN JOSE, CALIFORNIA 95112-1105
FAX (408) 573-7771
PHONE (408) 573-0555

84464

LAB KIFF DHS #

ALL ANALYSES MUST MEET SPECIFICATIONS AND DETECTION LIMITS SET BY CALIFORNIA DHS AND

EPA RWQCB REGION _____
 LIA
 OTHER

CHAIN OF CUSTODY
BTS # 130326-DW3

CLIENT PSC

SITE Earthgrains Baking Companies, Inc.
955 Kennedy St.
Oakland, CA

C = COMPOSITE ALL CONTAINERS

CONDUCT ANALYSIS TO DETECT									
BTEX (8260B)	TPH-d (8015M)	PAH's (8310)							
X	X	X							
X	X	X							
X	X	X							
X	X	X							
X	X	X							
X									

SPECIAL INSTRUCTIONS

Invoice & Report to: PSC Attn: Paul Anderson
210 West Sand Bank Rd. Columbia, IL 62236

PSC Project # Confirm w/Paul Anderson
panderson@pscnow.com
Ph. 618-281-1543

SAMPLE I.D.	DATE	TIME	MATRIX S=SOIL W=H ₂ O	CONTAINERS TOTAL							ADD'L INFORMATION	STATUS	CONDITION	LAB SAMPLE #
MW-101	3/26/13	1440	W	7										-01
MW-102		1310												-02
MW-103		1350												003
MW-104		1415												-04
MW-102 RP		1320												-05
TB	1	1205		2										-06

SAMPLING COMPLETED 3/26/13 1440 SAMPLING PERFORMED BY Daniel Allen RESULTS NEEDED NO LATER THAN Standard TAT

RELEASED BY [Signature] DATE 3/26/13 TIME 1620 RECEIVED BY [Signature] DATE 3/26/13 TIME 1620

RELEASED BY [Signature] DATE 3/28/13 TIME 1155 RECEIVED BY [Signature] DATE 032813 TIME 1217

SHIPPED VIA DATE SENT TIME SENT COOLER #

10-10-13

SAMPLE RECEIPT CHECKLIST

RECEIVER
RLM
Initials

SRG#: 84464 Date: 032813
Project ID: Earthgrains Baking Company
Method of Receipt: Courier Over-the-counter Shipper
Shipping Only: FedEx * OnTrac * Greyhound Other *Service level if not Priority or Sunrise (M-F): _____

COC Inspection

Is COC present? Yes No
Custody seals on shipping container? Intact Broken Not present N/A
Is COC Signed by Relinquisher? Yes No Dated? Yes No
Is sampler name legibly indicated on COC? Yes No
Is analysis or hold requested for all samples? Yes No
Is the turnaround time indicated on COC? Yes No
Is COC free of whiteout and uninitialed cross-outs? Yes No, Whiteout No, Cross-outs

Sample Inspection

Coolant Present: Yes No (includes water)
Temperature °C 3.0 Therm. ID# IR-1 Initial RLM Date/Time 032813/1748 N/A
Are there custody seals on sample containers? Intact Broken Not present
Do containers match COC? Yes No No, COC lists absent sample(s) No, Extra sample(s) present
Are there samples matrices other than soil, water, air or carbon? Yes No
Are any sample containers broken, leaking or damaged? Yes No
Are preservatives indicated? Yes, on sample containers Yes, on COC Not indicated N/A
Are preservatives correct for analyses requested? Yes No N/A
Are samples within holding time for analyses requested? Yes No
Are the correct sample containers used for the analyses requested? Yes No
Is there sufficient sample to perform testing? Yes No
Does any sample contain product, have strong odor or are otherwise suspected to be hot? Yes No

Receipt Details

Matrix WA Container type WOA # of containers received 27
Matrix WA Container type Amber # of containers received 10
Matrix _____ Container type _____ # of containers received _____
Date and Time Sample Put into Temp Storage Date: 032813 Time: 1753

Quicklog

Are the Sample ID's indicated: On COC On sample container(s) On Both Not indicated
If Sample ID's are listed on both COC and containers, do they all match? Yes No N/A
Is the Project ID indicated: On COC On sample container(s) On Both Not indicated
If project ID is listed on both COC and containers, do they all match? Yes No N/A
Are the sample collection dates indicated: On COC On sample container(s) On Both Not indicated
If collection dates are listed on both COC and containers, do they all match? Yes No N/A
Are the sample collection times indicated: On COC On sample container(s) On Both Not indicated
If collection times are listed on both COC and containers, do they all match? Yes No N/A

COMMENTS: Sample 84464-05 (mw-102 Dup) has "mw-102 Duplicate" on the container labels. SR logged it in as per the COC.
2/28/13 1840



Subcontract Laboratory Report Attachments



CALSCIENCE

WORK ORDER NUMBER: 13-03-2148

The difference is service



AIR | SOIL | WATER | MARINE CHEMISTRY

Analytical Report For

Client: Kiff Analytical

Client Project Name: Earthgrains Baking Companies, Inc.

Attention: Joel Kiff
2795 2nd Street, Suite 300
Davis, CA 95618-6505

Amanda Porter

Approved for release on 04/5/2013 by:
Amanda Porter
Project Manager

ResultLink ▶

Email your PM ▶



Calscience Environmental Laboratories, Inc. (Calscience) certifies that the test results provided in this report meet all NELAC requirements for parameters for which accreditation is required or available. Any exceptions to NELAC requirements are noted in the case narrative. The original report of subcontracted analyses, if any, is attached to this report. The results in this report are limited to the sample(s) tested and any reproduction thereof must be made in its entirety. The client or recipient of this report is specifically prohibited from making material changes to said report and, to the extent that such changes are made, Calscience is not responsible, legally or otherwise. The client or recipient agrees to indemnify Calscience for any litigation which may arise.



Contents

Client Project Name: Earthgrains Baking Companies, Inc.

Work Order Number: 13-03-2148

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2	Client Sample Data	4
	2.1 EPA 8310 Polynuclear Aromatic Hydrocarbons (Aqueous)	4
3	Quality Control Sample Data	7
	3.1 LCS/LCSD	7
4	Glossary of Terms and Qualifiers	8
5	Chain of Custody/Sample Receipt Form	9

Condition Upon Receipt:

Samples were received under Chain of Custody (COC) on 03/30/2013. They were assigned to Work Order 13-03-2148.

Unless otherwise noted on the Sample Receiving forms all samples were received in good condition and within the recommended EPA temperature criteria for the methods noted on the COC. The COC and Sample Receiving Documents are integral elements of the analytical report and are presented at the back of the report.

Holding Times:

All samples were analyzed within prescribed holding times (HT) and/or in accordance with the Calscience Sample Acceptance Policy unless otherwise noted in the analytical report and/or comprehensive case narrative, if required.

Any parameter identified in 40CFR Part 136.3 Table II that is designated as "analyze immediately" with an immediate holding time (HT \leq 15 minutes --40CFR-136.3 Table II footnote 4), is considered a "field" test and reported samples results are not flagged unless the analysis is performed beyond 24 hours of the time of collection.

Quality Control:


All quality control parameters (QC) were within established control limits except where noted in the QC summary forms or described further within this report.

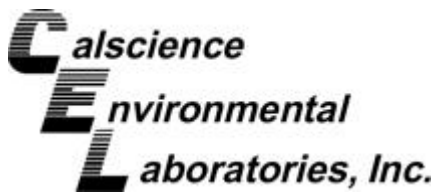
Additional Comments:

Solid - Unless otherwise indicated, solid sample data is reported on a wet weight basis, not corrected for % moisture. All QC results are always reported on a wet weight basis.

Subcontract Information:

Unless otherwise noted below (or on the subcontract form), no samples were subcontracted.





Analytical Report



Kiff Analytical
2795 2nd Street, Suite 300
Davis, CA 95618-6505

Date Received: 03/30/13
Work Order No: 13-03-2148
Preparation: EPA 3510C
Method: EPA 8310
Units: ug/L

Project: Earthgrains Baking Companies, Inc.

Page 1 of 3

Client Sample Number	Lab Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared	Date/Time Analyzed	QC Batch ID
MW-101	13-03-2148-1-A	03/26/13 14:40	Aqueous	HPLC 5	04/01/13	04/02/13 19:52	130401L15

Comment(s): -Results were evaluated to the MDL (DL), concentrations >= to the MDL (DL) but < RL (LOQ), if found, are qualified with a "J" flag.

Parameter	Result	RL	MDL	DF	Qual	Parameter	Result	RL	MDL	DF	Qual
Naphthalene	ND	1.0	0.077	1		Benzo (a) Anthracene	ND	1.0	0.036	1	
Acenaphthylene	ND	1.0	0.051	1		Chrysene	ND	1.0	0.033	1	
Acenaphthene	ND	1.0	0.038	1		Benzo (b) Fluoranthene	ND	1.0	0.034	1	
Fluorene	ND	1.0	0.044	1		Benzo (k) Fluoranthene	ND	1.0	0.036	1	
Phenanthrene	ND	1.0	0.040	1		Benzo (a) Pyrene	ND	0.20	0.028	1	
Anthracene	ND	1.0	0.044	1		Dibenz (a,h) Anthracene	ND	1.0	0.042	1	
Fluoranthene	ND	1.0	0.035	1		Benzo (g,h,i) Perylene	ND	1.0	0.041	1	
Pyrene	ND	1.0	0.046	1		Indeno (1,2,3-c,d) Pyrene	ND	1.0	0.053	1	

Surrogates:

	REC (%)	Control Limits	Qual
Decafluorobiphenyl	65	14-120	

Client Sample Number	Lab Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared	Date/Time Analyzed	QC Batch ID
MW-102	13-03-2148-2-A	03/26/13 13:10	Aqueous	HPLC 5	04/01/13	04/02/13 20:24	130401L15

Comment(s): -Results were evaluated to the MDL (DL), concentrations >= to the MDL (DL) but < RL (LOQ), if found, are qualified with a "J" flag.

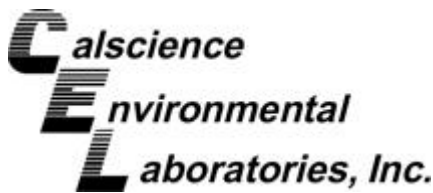
Parameter	Result	RL	MDL	DF	Qual	Parameter	Result	RL	MDL	DF	Qual
Naphthalene	ND	1.0	0.077	1		Benzo (a) Anthracene	ND	1.0	0.036	1	
Acenaphthylene	ND	1.0	0.051	1		Chrysene	ND	1.0	0.033	1	
Acenaphthene	ND	1.0	0.038	1		Benzo (b) Fluoranthene	ND	1.0	0.034	1	
Fluorene	ND	1.0	0.044	1		Benzo (k) Fluoranthene	ND	1.0	0.036	1	
Phenanthrene	ND	1.0	0.040	1		Benzo (a) Pyrene	ND	0.20	0.028	1	
Anthracene	ND	1.0	0.044	1		Dibenz (a,h) Anthracene	ND	1.0	0.042	1	
Fluoranthene	ND	1.0	0.035	1		Benzo (g,h,i) Perylene	ND	1.0	0.041	1	
Pyrene	ND	1.0	0.046	1		Indeno (1,2,3-c,d) Pyrene	ND	1.0	0.053	1	

Surrogates:

	REC (%)	Control Limits	Qual
Decafluorobiphenyl	43	14-120	

RL - Reporting Limit , DF - Dilution Factor , Qual - Qualifiers





Analytical Report



Kiff Analytical
2795 2nd Street, Suite 300
Davis, CA 95618-6505

Date Received: 03/30/13
Work Order No: 13-03-2148
Preparation: EPA 3510C
Method: EPA 8310
Units: ug/L

Project: Earthgrains Baking Companies, Inc.

Page 2 of 3

Client Sample Number	Lab Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared	Date/Time Analyzed	QC Batch ID
MW-103	13-03-2148-3-A	03/26/13 13:50	Aqueous	HPLC 5	04/01/13	04/02/13 20:57	130401L15

Comment(s): -Results were evaluated to the MDL (DL), concentrations >= to the MDL (DL) but < RL (LOQ), if found, are qualified with a "J" flag.

Parameter	Result	RL	MDL	DF	Qual	Parameter	Result	RL	MDL	DF	Qual
Naphthalene	ND	1.0	0.077	1		Benzo (a) Anthracene	ND	1.0	0.036	1	
Acenaphthylene	ND	1.0	0.051	1		Chrysene	ND	1.0	0.033	1	
Acenaphthene	ND	1.0	0.038	1		Benzo (b) Fluoranthene	ND	1.0	0.034	1	
Fluorene	ND	1.0	0.044	1		Benzo (k) Fluoranthene	ND	1.0	0.036	1	
Phenanthrene	ND	1.0	0.040	1		Benzo (a) Pyrene	ND	0.20	0.028	1	
Anthracene	ND	1.0	0.044	1		Dibenz (a,h) Anthracene	ND	1.0	0.042	1	
Fluoranthene	ND	1.0	0.035	1		Benzo (g,h,i) Perylene	ND	1.0	0.041	1	
Pyrene	ND	1.0	0.046	1		Indeno (1,2,3-c,d) Pyrene	ND	1.0	0.053	1	

Surrogates:

	REC (%)	Control Limits	Qual
Decafluorobiphenyl	47	14-120	

Client Sample Number	Lab Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared	Date/Time Analyzed	QC Batch ID
MW-104	13-03-2148-4-A	03/26/13 14:15	Aqueous	HPLC 5	04/01/13	04/02/13 21:29	130401L15

Comment(s): -Results were evaluated to the MDL (DL), concentrations >= to the MDL (DL) but < RL (LOQ), if found, are qualified with a "J" flag.

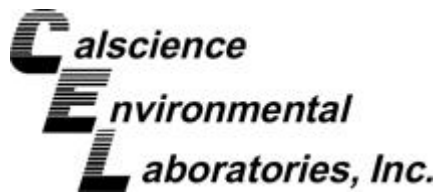
Parameter	Result	RL	MDL	DF	Qual	Parameter	Result	RL	MDL	DF	Qual
Naphthalene	ND	1.0	0.077	1		Benzo (a) Anthracene	ND	1.0	0.036	1	
Acenaphthylene	ND	1.0	0.051	1		Chrysene	ND	1.0	0.033	1	
Acenaphthene	ND	1.0	0.038	1		Benzo (b) Fluoranthene	ND	1.0	0.034	1	
Fluorene	ND	1.0	0.044	1		Benzo (k) Fluoranthene	ND	1.0	0.036	1	
Phenanthrene	ND	1.0	0.040	1		Benzo (a) Pyrene	ND	0.20	0.028	1	
Anthracene	ND	1.0	0.044	1		Dibenz (a,h) Anthracene	ND	1.0	0.042	1	
Fluoranthene	ND	1.0	0.035	1		Benzo (g,h,i) Perylene	ND	1.0	0.041	1	
Pyrene	ND	1.0	0.046	1		Indeno (1,2,3-c,d) Pyrene	ND	1.0	0.053	1	

Surrogates:

	REC (%)	Control Limits	Qual
Decafluorobiphenyl	56	14-120	

RL - Reporting Limit , DF - Dilution Factor , Qual - Qualifiers





Analytical Report



Kiff Analytical
2795 2nd Street, Suite 300
Davis, CA 95618-6505

Date Received: 03/30/13
Work Order No: 13-03-2148
Preparation: EPA 3510C
Method: EPA 8310
Units: ug/L

Project: Earthgrains Baking Companies, Inc.

Page 3 of 3

Client Sample Number	Lab Sample Number	Date/Time Collected	Matrix	Instrument	Date Prepared	Date/Time Analyzed	QC Batch ID
MW-102 DUP	13-03-2148-5-A	03/26/13 13:20	Aqueous	HPLC 5	04/01/13	04/02/13 22:01	130401L15

Comment(s): -Results were evaluated to the MDL (DL), concentrations >= to the MDL (DL) but < RL (LOQ), if found, are qualified with a "J" flag.

Parameter	Result	RL	MDL	DF	Qual	Parameter	Result	RL	MDL	DF	Qual
Naphthalene	ND	1.0	0.077	1		Benzo (a) Anthracene	ND	1.0	0.036	1	
Acenaphthylene	ND	1.0	0.051	1		Chrysene	ND	1.0	0.033	1	
Acenaphthene	ND	1.0	0.038	1		Benzo (b) Fluoranthene	ND	1.0	0.034	1	
Fluorene	ND	1.0	0.044	1		Benzo (k) Fluoranthene	ND	1.0	0.036	1	
Phenanthrene	ND	1.0	0.040	1		Benzo (a) Pyrene	ND	0.20	0.028	1	
Anthracene	ND	1.0	0.044	1		Dibenz (a,h) Anthracene	ND	1.0	0.042	1	
Fluoranthene	ND	1.0	0.035	1		Benzo (g,h,i) Perylene	ND	1.0	0.041	1	
Pyrene	ND	1.0	0.046	1		Indeno (1,2,3-c,d) Pyrene	ND	1.0	0.053	1	

Surrogates:	REC (%)	Control Limits	Qual
Decafluorobiphenyl	45	14-120	

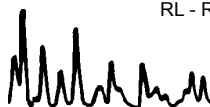
Method Blank	099-07-003-1,891	N/A	Aqueous	HPLC 5	04/01/13	04/02/13 17:10	130401L15
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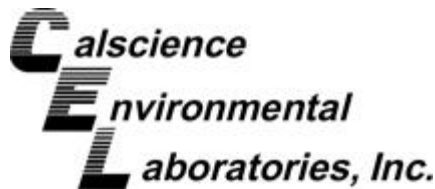
Comment(s): -Results were evaluated to the MDL (DL), concentrations >= to the MDL (DL) but < RL (LOQ), if found, are qualified with a "J" flag.

Parameter	Result	RL	MDL	DF	Qual	Parameter	Result	RL	MDL	DF	Qual
Naphthalene	ND	1.0	0.077	1		Benzo (a) Anthracene	ND	1.0	0.036	1	
Acenaphthylene	ND	1.0	0.051	1		Chrysene	ND	1.0	0.033	1	
Acenaphthene	ND	1.0	0.038	1		Benzo (b) Fluoranthene	ND	1.0	0.034	1	
Fluorene	ND	1.0	0.044	1		Benzo (k) Fluoranthene	ND	1.0	0.036	1	
Phenanthrene	ND	1.0	0.040	1		Benzo (a) Pyrene	ND	0.20	0.028	1	
Anthracene	ND	1.0	0.044	1		Dibenz (a,h) Anthracene	ND	1.0	0.042	1	
Fluoranthene	ND	1.0	0.035	1		Benzo (g,h,i) Perylene	ND	1.0	0.041	1	
Pyrene	ND	1.0	0.046	1		Indeno (1,2,3-c,d) Pyrene	ND	1.0	0.053	1	

Surrogates:	REC (%)	Control Limits	Qual
Decafluorobiphenyl	69	14-120	

RL - Reporting Limit , DF - Dilution Factor , Qual - Qualifiers





Quality Control - LCS/LCS Duplicate



Kiff Analytical
2795 2nd Street, Suite 300
Davis, CA 95618-6505

Date Received: N/A
Work Order No: 13-03-2148
Preparation: EPA 3510C
Method: EPA 8310

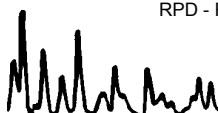
Project: Earthgrains Baking Companies, Inc.

Quality Control Sample ID	Matrix	Instrument	Date Prepared	Date Analyzed	LCS/LCSD Batch Number					
099-07-003-1,891	Aqueous	HPLC 5	04/01/13	04/02/13	130401L15					
Parameter	SPIKE ADDED	LCS CONC	LCS %REC	LCSD CONC	LCSD %REC	%REC CL	ME_CL	RPD	RPD CL	Qualifiers
Naphthalene	2.000	1.775	89	1.798	90	36-144	18-162	1	0-25	
Acenaphthylene	2.000	1.473	74	1.237	62	51-120	40-132	17	0-23	
Acenaphthene	2.000	1.230	61	1.044	52	44-120	31-133	16	0-20	
Fluorene	2.000	1.678	84	1.404	70	52-120	41-131	18	0-21	
Phenanthrene	2.000	1.752	88	1.564	78	58-120	48-130	11	0-21	
Anthracene	2.000	1.542	77	1.380	69	52-120	41-131	11	0-20	
Fluoranthene	2.000	1.803	90	1.709	85	57-120	46-130	5	0-20	
Pyrene	2.000	1.867	93	1.762	88	55-121	44-132	6	0-22	
Benzo (a) Anthracene	2.000	1.877	94	1.794	90	58-120	48-130	5	0-23	
Chrysene	2.000	1.941	97	1.848	92	58-120	48-130	5	0-20	
Benzo (b) Fluoranthene	2.000	1.846	92	1.748	87	55-121	44-132	5	0-23	
Benzo (k) Fluoranthene	2.000	1.939	97	1.825	91	56-122	45-133	6	0-22	
Benzo (a) Pyrene	2.000	1.682	84	1.578	79	43-120	30-133	6	0-24	
Dibenz (a,h) Anthracene	2.000	1.943	97	1.841	92	55-121	44-132	5	0-24	
Benzo (g,h,i) Perylene	2.000	1.925	96	1.834	92	58-120	48-130	5	0-23	
Indeno (1,2,3-c,d) Pyrene	2.000	1.970	99	1.876	94	63-123	53-133	5	0-21	

Total number of LCS compounds : 16
 Total number of ME compounds : 0
 Total number of ME compounds allowed : 1
 LCS ME CL validation result : Pass

Return to Contents

RPD - Relative Percent Difference , CL - Control Limit

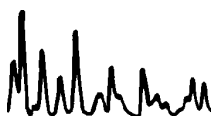


Work Order Number: 13-03-2148

<u>Qualifier</u>	<u>Definition</u>
*	See applicable analysis comment.
<	Less than the indicated value.
>	Greater than the indicated value.
1	Surrogate compound recovery was out of control due to a required sample dilution. Therefore, the sample data was reported without further clarification.
2	Surrogate compound recovery was out of control due to matrix interference. The associated method blank surrogate spike compound was in control and, therefore, the sample data was reported without further clarification.
3	Recovery of the Matrix Spike (MS) or Matrix Spike Duplicate (MSD) compound was out of control due to matrix interference. The associated LCS and/or LCSD was in control and, therefore, the sample data was reported without further clarification.
4	The MS/MSD RPD was out of control due to matrix interference. The LCS/LCSD RPD was in control and, therefore, the sample data was reported without further clarification.
5	The PDS/PDSD or PES/PESD associated with this batch of samples was out of control due to a matrix interference effect. The associated batch LCS/LCSD was in control and, hence, the associated sample data was reported without further clarification.
6	Surrogate recovery below the acceptance limit.
7	Surrogate recovery above the acceptance limit.
B	Analyte was present in the associated method blank.
BU	Sample analyzed after holding time expired.
BV	Sample received after holding time expired.
E	Concentration exceeds the calibration range.
ET	Sample was extracted past end of recommended max. holding time.
HD	The chromatographic pattern was inconsistent with the profile of the reference fuel standard.
HDL	The sample chromatographic pattern for TPH matches the chromatographic pattern of the specified standard but heavier hydrocarbons were also present (or detected).
HDL	The sample chromatographic pattern for TPH matches the chromatographic pattern of the specified standard but lighter hydrocarbons were also present (or detected).
J	Analyte was detected at a concentration below the reporting limit and above the laboratory method detection limit. Reported value is estimated.
ME	LCS/LCSD Recovery Percentage is within Marginal Exceedance (ME) Control Limit range.
ND	Parameter not detected at the indicated reporting limit.
Q	Spike recovery and RPD control limits do not apply resulting from the parameter concentration in the sample exceeding the spike concentration by a factor of four or greater.
SG	The sample extract was subjected to Silica Gel treatment prior to analysis.
X	% Recovery and/or RPD out-of-range.
Z	Analyte presence was not confirmed by second column or GC/MS analysis.

Solid - Unless otherwise indicated, solid sample data is reported on a wet weight basis, not corrected for % moisture. All QC results are reported on a wet weight basis.

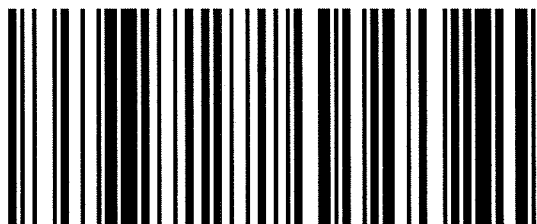
For any analysis identified as a "field" test with a holding time (HT) \leq 15 minutes where the sample is received outside of HT, CalScience will adhere to its internal HT of 24 hours. In cases where sample analysis does not meet CalScience's internal HT, results will be appropriately qualified.



2148



800.334.5000
ontrac.com



D10010565544272

Date Printed 3/29/2013

Tracking#D10010565544272

Shipped From:

KIFF ANALYTICAL
2795 2ND STREET 300
DAVIS, CA 95618

Sent By: SAMPLE RECEIVINGX125

Phone#: (530)297-4800

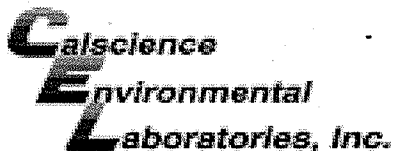
wgt(lbs): 50

Reference: SUB 84464

Reference 2:

<p><i>Ship To Company:</i> CALSCIENCE ENVIRONMENTAL 7440 LINCOLN WAY GARDEN GROVE, CA 92841 RECEIVING (714)895-5494</p>	<p><i>Service:</i> S <i>Sort Code:</i> ORG <i>Special Services:</i> Saturday Delivery Signature Required</p>
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WORK ORDER #: 13-03-2148

SAMPLE RECEIPT FORM

Cooler 1 of 1

CLIENT: KIFF

DATE: 03/30/13

TEMPERATURE: Thermometer ID: SC2 (Criteria: 0.0°C – 6.0°C, not frozen except sediment/tissue)

Temperature 2.3°C - 0.2°C (CF) = 2.1°C [X] Blank [] Sample

- [] Sample(s) outside temperature criteria (PM/APM contacted by: _____).
[] Sample(s) outside temperature criteria but received on ice/chilled on same day of sampling.

[] Received at ambient temperature, placed on ice for transport by Courier.

Ambient Temperature: [] Air [] Filter

Initial: YC

CUSTODY SEALS INTACT:

- [X] Cooler [] [] No (Not Intact) [] Not Present [] N/A
[] Sample [] [] No (Not Intact) [X] Not Present

Initial: YC
Initial: TN

SAMPLE CONDITION:

Table with 4 columns: Item, Yes, No, N/A. Rows include Chain-Of-Custody (COC) document(s) received with samples, COC document(s) received complete, Sampler's name indicated on COC, Sample container label(s) consistent with COC, etc.

CONTAINER TYPE:

- Solid: [] 4ozCGJ [] 8ozCGJ [] 16ozCGJ [] Sleeve () [] EnCores® [] TerraCores® []
Water: [] VOA [] VOAh [] VOAna2 [] 125AGB [] 125AGBh [] 125AGBp [X] 1AGB [] 1AGBna2 [] 1AGBs
[] 500AGB [] 500AGJ [] 500AGJs [] 250AGB [] 250CGB [] 250CGBs [] 1PB [] 1PBna [] 500PB
[] 250PB [] 250PBn [] 125PB [] 125PBzanna [] 100PJ [] 100PJna2 [] [] [] []

Air: [] Tedlar® [] Canister Other: [] Trip Blank Lot#: Labeled/Checked by: TN
Container: C: Clear A: Amber P: Plastic G: Glass J: Jar B: Bottle Z: Ziploc/Resealable Bag E: Envelope Reviewed by: WSK
Preservative: h: HCL n: HNO3 na2:Na2S2O3 na: NaOH p: H3PO4 s: H2SO4 u: Ultra-pure zanna: ZnAc2+NaOH f: Filtered Scanned by: WSK



ATTACHMENT 6

SWRCB UST CLEANUP FUND SECOND FIVE-YEAR REVIEW SUMMARY REPORT



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

January 20, 2012

Donna Drogos, Division Chief
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

**SECOND 5-YEAR REVIEW SUMMARY REPORT FOR CLAIM NUMBER 18948;
LOCATED AT 955 KENNEDY STREET, OAKLAND, CA**

The UST Cleanup Fund (Fund) has completed our review of Alameda County Environmental Health (Alameda County) Case No. RO0002569. The 5-Year Review Summary Report for this case is enclosed for your information and comment. Please note that the Fund's recommendations are based on review of information contained in the Fund's case files, data currently in the GeoTracker database and any other sources of information that were readily available to Fund staff at the time the review was conducted. Consequently, they may not reflect historical information that has not been uploaded to the GeoTracker database or available in the Fund's case files and any data that has been recently submitted to your office.

The Fund requests that Alameda County staff notify the Fund within 45 days from the date of this letter as to whether you agree or disagree with our recommendations for this case. If you agree with our recommendation, we request that you provide the Fund with an estimated timeframe to either implement the recommendations for additional corrective action or for closing this case. If you do not agree with our recommendations, we request that you provide the Fund with a summary of the reasons for disagreeing and/or impediments to implementing the recommendations for additional corrective action or closing this case. Responses to the Fund may be provided by e-mail, letter or a copy of correspondence to the RP, if the correspondence addresses all the information requested by the Fund. Please direct your response to:

Pat G. Cullen, P.G.
Underground Storage Tank Cleanup Fund
State Water Resources Control Board
P.O. Box 944212
Sacramento, CA 94244-2120
(PCullen@waterboards.ca.gov)

California Environmental Protection Agency



Fund staff will be sending copies of the completed 5-Year Review Summary Report to applicable claimants 45 days from the date of this letter unless Alameda County notifies the Fund that they wish to discuss this case prior to transmittal to the claimant. If you or your staff has any questions or concerns on specific reports that you would like to discuss with the Fund prior to transmittal of the report to the claimant, please contact Pat G. Cullen at (916) 341-5735 or by email (PCullen@waterboards.ca.gov) within this period.

Sincerely,



Robert Trommer
Senior Engineering Geologist
Chief, Technical Review Unit
Underground Storage Tank Cleanup Fund

CC: Paresh Khatri, LOP (via email)

State Water Resources Control Board

**USTCF 5-YEAR REVIEW SUMMARY
PRELIMINARY REVIEW – JANUARY 2012**

Agency Information

Agency Name: Alameda County LOP	Address: 1131 Harbor Bay Parkway Alameda CA 94501-6577
Agency Caseworker: Paresh Khatri	

Case Information

Case No: RO0002569	Global ID: T0600177342
Site Name: Earthgrains Baking Co.	Site Address: 955 Kennedy Street, Oakland
Responsible Party: Melvin Siegel	Address: 955 Kennedy Street, Oakland, CA 94606
USTCF Claim No.: 18948	Number of Years Case Open: 9
USTCF Expenditures to Date: \$954,549	

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active?	Date
1	10,000	Diesel	Removed	1989 to 1991
2	10,000	Diesel	Removed	1989 to 1991
3	10,000	Diesel	Removed	1989 to 1991
4	10,000	Diesel	Removed	1989 to 1991
5	10,000	Diesel	Removed	1989 to 1991
6	10,000	Diesel	Removed	1989 to 1991
7	10,000	Diesel	Removed	2005
8	10,000	Gasoline	Removed	1989 to 1991
9	350	Waste Oil	Removed	January 1991

Release Information

- Source of Release: Underground storage tanks system (USTs)
- Date of Release: Reported 4/15/2003
- Affected Media: Soil and Groundwater

Site Information

- GW Basin: Santa Clara Valley – East Bay Plain
- Watershed: South Bay – East Bay Cities
- Beneficial Uses: Municipal and domestic supply
- Land Use Designation: Industrial
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no California Department of Public Health (CDPH) water supply wells within ½ mile of

the Site.

- Minimum Groundwater Depth: 7.60 feet below ground surface (bgs) at monitoring well MW-104.
- Maximum Groundwater Depth: 10.02 feet bgs at monitoring well MW-102.
- Groundwater Flow Direction: Predominately to the southwest with an average gradient of 0.005 to 0.01 feet/foot (ft/ft).
- Soil Types: The Site is underlain by clays, silts, sandy silts and fine sands with occasional gravels.
- Maximum Depth Sampled: 28 feet bgs

Monitoring Well Information

Well Designation	Date Installed	Screen Interval (feet bgs)	Most Recent Depth To Groundwater (feet bgs) (7/26/2011)
MW-101	1/20/2009	18-28	9.12
MW-102	1/20/2009	18-28	9.55
MW-103	1/20/2009	10-25	8.84
MW-104	1/20/2009	10-25	8.84

NA – not available

Contaminant Concentration

Contaminant	Soil (mg/kg)		Water (ug/L)		WQO (ug/L)
	Maximum 2003	Latest 10/19/2010	Maximum 2009	Latest (7/26/2011)	
TPHg	NA	NA	NA	NA	--
TPHd	3,300	150	160	100	--
Benzene	<0.005	<0.005	<0.50	<0.50	1
Toluene	<0.005	<0.005	<0.50	<0.50	300
Ethylbenzene	<0.005	<0.005	<0.50	<0.50	700
Xylenes	<0.005	<0.005	<0.50	<0.50	1,750
MTBE	NA	NA	NA	NA	5

NA Not Analyzed, Not Applicable or Data Not Available
 mg/kg milligrams per kilogram, parts per million
 ug/L micrograms per liter, parts per billion
 WQO Water Quality Objectives

Site Description

The Site occupies approximately five acres of land in Oakland, California. Earthgrains (*formerly* Kilpatrick's Bakeries, Inc.) currently owns and operates a 105,000 square-foot plant consisting of a bakery, product distribution center, and retail outlet store at the Site. An asphalt-paved parking area and driveway border the eastern and western sides of the Site and six truck loading docks are situated in the northwestern portion of the facility. A stand-alone truck wash building is located west of the plant and a truck maintenance garage was formerly located in the northwestern corner of the Site. The Site is bounded by Dennison Street to the north, Frederick Street to the south, Kennedy Street to the east, and King Street to the west. Surrounding properties to the north, south, and west of the Site are industrial and commercial businesses. Interstate 880 is located due east of Kennedy Street.

Site History/Assessments

Earthgrains installed and operated eight UST systems at the Site from 1967 to 2005 for fleet operations and back-up oven fuel storage. Historic subsurface investigations and corrective actions were performed from 1989 through 1996 for an unauthorized diesel UST system release at the Site. Earthgrains obtained case closure in April 1996 after performing a Tier 1 Risk Assessment in accordance with the American Society of Testing and Materials (ASTM), Emergency Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites ES 38-94.

Earthgrains reported an additional unauthorized diesel UST system release at the Site in 2003 following the discovery of petroleum hydrocarbons during product piping modifications at a diesel pump island. Since the Tier 1 Risk Assessment report indicated that residual petroleum hydrocarbons remained in soil near the 2003 diesel UST system release area, corrective action for the additional unauthorized release of diesel fuel was conducted under the original California UST Fund application and letter of commitment.

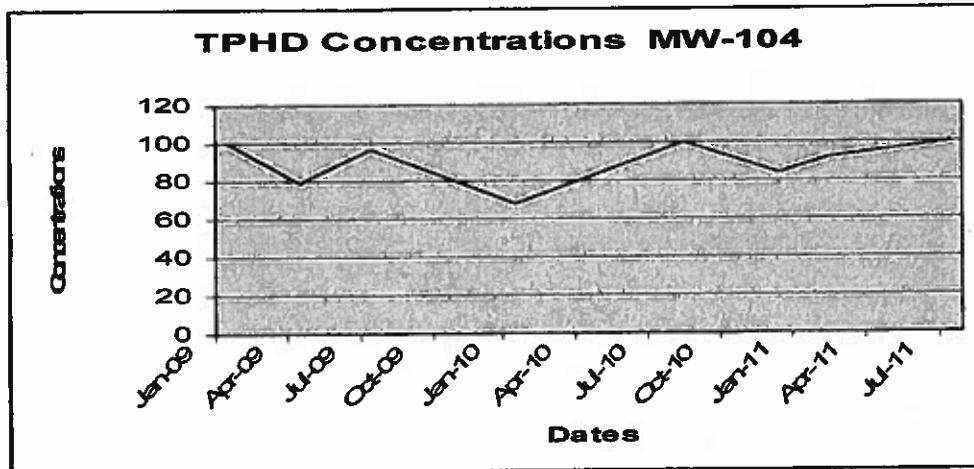
Investigation and corrective action since 2005 has been conducted under RO#0002569. PSC and subcontractors have performed numerous investigations and a source area removal corrective action at the Site during this period. The investigations have included over 55 soil borings, 275 soil samples, and 52 groundwater grab samples. Four additional groundwater monitoring wells and one groundwater de-watering well were installed and numerous groundwater-sampling events have been completed. PSC also prepared and submitted a *Tier 1 Risk Assessment and No Further Action Request Report* on September 17, 2009.

Remediation Summary

- **Free Product:** No free product was documented throughout the life of this case.
- **Soil Excavation:** An unknown amount of soil was excavated during the various USTs removal actions. It was estimated 755 cubic yards of contaminated soil was excavated in November 2010.
- **Groundwater Remediation:** A measured 13,000 gallons of affected groundwater was pumped, treated and disposed during the over excavation activities in November 2010.

General Site Conditions

- **Geology and Hydrogeology:** The Site is underlain by interbedded clays, silts, with occasional sands and gravels. The depth to groundwater varies seasonally between eight and 10 feet bgs and the groundwater gradient is southwest at approximately 0.001 to 0.01 ft/ft. The closest surface water is an estuary, located approximately 800 feet west southwest of the Site.
- **Estimate of Hydrocarbon Mass in Soil:** Post remediation, approximately 1,645 pounds of TPHd was calculated to remain in the vicinity of the former USTs in soil and groundwater.
- **Groundwater Trends:** There are more than three years of groundwater monitoring data for this Site. The following graph show analytical data for the well with remaining TPHd (MW-104).



- Water Quality Objectives: Water Quality Objectives have already been met. TPHd was detected at 100 µg/l which is above the reporting limit of 50 µg/l. There is no WQO for TPHd.

Sensitive Receptor Survey

A Sensitive Receptor Survey (SRS) was conducted in April 2008 by ECIS. A records search at the Department of Water Resources and an on-the-ground survey in the area did not identify any water supply wells within a 2,000 foot radius of the Site. An estuary is located approximately 800 feet west-southwest of the Site. Drinking water at and near the Site is currently supplied by the East Bay Municipal Utility District.

Risk Evaluation

As a result of removal of approximately 755 cubic yards of soil and 13,000 gallons of affected groundwater, there is little residual petroleum hydrocarbon in soil at the Site that would pose a threat to groundwater resources, human health, or the environment. Constituents of concern are below applicable WQO or detection limits. Since residual concentrations are low, the Site and public areas are paved with thick concrete, and the Site is currently a commercial bakery, there is little potential for hydrocarbon vapors to migrate or pose a threat to human health or the environment. There are no water supply wells are present within 2,000 feet of the Site.

Recommendation

The UST Fund has completed a Preliminary 5-Year review for this Site and off the LOP these recommendations for consideration. Based on the hydrology, geology and other factors at and in the vicinity of the Site, the residual TPHd that remains in the soil and groundwater pose a very low risk to public health, safety and the environment. The remaining mass of residual TPHd is limited and the dissolved TPHd in the source area are biodegrading. Affected groundwater is not currently used as a source for drinking water nor is likely to be used for one in the foreseeable future. Drinking water in the area is provided by the East Bay Municipal Utility District. The Fund recommends the LOP consider this case for closure.

Earthgrain's Baking Company
Claim 18948

- 5 -

January 2012

Pat G. Cullen 1-20-12
Pat G. Cullen Date
Technical Review Unit
(916) 341-5735

Robert Trommer 1-20-12
Robert Trommer, CHg Date
Senior Engineering Geologist
Chief, Technical Review Unit
(916) 341-5684

