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Alameda County
Environmental Health

**NOTICE OF INTENT
TO
DISCHARGE FOR RWQCB PERMIT**

EMERY STATION EAST
5885 HOLLIS STREET
EMERYVILLE, CA

NOVEMBER 1, 2005

Prepared for:
DPR
Redwood City, California

Prepared by:



Pacific States
ENVIRONMENTAL CONTRACTORS, INC.
California Contractor License #723241 A-H-52



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SIGNATURE PAGE

All engineering information, conclusions, and recommendations contained in this report have been prepared by a California Professional Engineer.

William P. Simons
California Professional Engineer
Civil (37814)

Date

1.0 INTRODUCTION

This Notice of Intent to Discharge from a Fuel Leak Site under NPDES CAG912002, (“NOI”) has been prepared by Pacific States Environmental Contractors, Inc. (PSEC) on behalf of Wareham Development Group San Rafael, California. The Application has been prepared for discharge of water generated by dewatering activities on the property located at 5885 Hollis Street Emeryville, CA, see Figure 1. The site will be developed into either a commercial/laboratory space or multi-family residential constructed over subgrade parking.

This application is being submitted to the Regional Water Quality Control Board – San Francisco Region (“the Regional Board”) pursuant to Order Number 01-100, CAG912002, a General Waste Discharge Requirement Permit. The application is being submitted to obtain Regional Board authorization to discharge treated groundwater generated by dewatering activities during construction of a parking garage and underground utilities at the Site. The groundwater beneath part of the Site is impacted by petroleum hydrocarbons.

As part of the development, excavation of underlying soil will be conducted to allow for a subgrade basement garage. The excavation will require dewatering and these dewatering activities will remove a significant quantity of contaminated groundwater. That water will be treated using treatment equipment provided by Baker Tanks and maintained by PSEC.

2.0 PROJECT DESCRIPTION

Groundwater from dewatering operations will be pumped to the temporary treatment system. Water will be pumped into a 21,000-gallon tank to allow settlement of suspended solids. The water will then pass through a sand filter, and then through at least two 2,000-pound 75 psi granular activated carbon vessels containing either coconut shell carbon or bituminous carbon. The carbon vessels will be arranged in series and parallel to provide adequate time between carbon change outs. The water will be discharged to an effluent storage tank to make treated water available for dust control and compaction use during construction. Unused treated effluent water will flow from the effluent tank via a discharge line to the storm drain inlet at the south end of the jobsite on Pleadeau Street. The process flow schematic is shown in Figure 3.

Sludge from the settling tank has been characterized prior to dewatering (See Predevelopment Investigation Reports by Treadwell & Rollo). It will be disposed in accordance with state and federal regulations. Activated carbon will be transported to a regeneration facility in accordance with state and federal regulations.

2.1 DESIGN CRITERIA

The maximum dewatering influent and effluent discharge flow rate for the treatment system of 30 wells is 5 gallons per minute per well, or 216,000 gallons per day. Average daily flows will likely be in the range of 210,000 to 220,000 gallons per day. Maximum inflow concentrations of total petroleum hydrocarbons as diesel (TPH-d) have been estimated at 8,400 $\mu\text{g/l}$. The system is also designed to treat low concentrations of benzene, toluene, ethyl benzene and total xylenes (BTEX), and other non-chlorinated volatile organic compounds (VOCs) that may be encountered during dewatering.

Effluent criteria for benzene, toluene and ethyl benzene compounds are 5 $\mu\text{g/l}$. Effluent criteria for TPH is 50 $\mu\text{g/l}$.



TPHg, TPH-d, and BTEX concentrations will be monitored via samples collected at the influent (I-1, following the settling tank) the carbon filter midpoint (M-1), and effluent from the carbon filters (E-1). Additional sampling will occur as required in the NPDES permit CAG912002 Self-Monitoring Program.

3.0 APPLICATION MATERIALS

The following sections provide the materials requested by the Regional Board for the complete application package.

3.1 EFFLUENT RECLAMATION STUDY

3.1.1 Reuse of Treated Groundwater

PSEC has reviewed potential uses for reclaimed water in the Site area with the General Contractor. Since this water will be generated for only a short time during construction, the most suitable reclamation uses will be on-site construction uses for dust control and compaction. The volume of water required for this use will vary depending on construction activities. A pump will be provided in the effluent storage tank to allow water truck drivers to fill their tanks. The extent of the water use will be within the boundaries of the construction site.

The volume of water that will be used onsite for construction is estimated to be 0 to 24,000 gallons per day (gpd). The reclaimed water will be used for dust control and for controlling moisture content during compaction. The water will be used onsite by the Contractor, and will be delivered to points of use by water truck or fire hose. The water will be used during construction hours, which will generally be 7AM to 3PM Monday through Friday, but which may include additional hours depending on construction schedule demands.

Runoff and human contact will be minimized by the nature of use: over-watering will create mud which will be detrimental to construction activities, so construction foremen will be required to regulate the use. The water will be reused as needed for the duration of the dewatering activities.

The reused water will be monitored through observation by construction supervisors who will identify and correct excessive spraying.



The user of the water will be the DPR Construction Inc. contractors and subcontractors.

3.1.2 Discharge to POTW

Pacific States has contacted Gale Topper of East Bay Municipal Utility District via telephone. The purpose of the call was to identify whether the District will accept the wastewater associated with construction dewatering. According to Gale Topper, the District would accept the dewater-effluent after treatment for dissolved organics at a cost of \$0.03/gallon. The additional monthly cost impact of \$97,000 to \$250,000 would place significant economic strain on the project.

3.2 U.S. EPA APPLICATION FORMS

U.S. EPA Application Forms 1 and 2D are included in Appendix B. The forms are signed by a corporate officer of Project Owner (Wareham Development Group)

3.3 PROCESSING FEE

The \$5,688.00 processing fee is attached.

3.4 SUMMARY OF CHEMICAL ANALYSES FOR UNTREATED GROUNDWATER

The Site and adjacent properties have been extensively investigated as part of predevelopment investigations. Appendix C contains summary tables of groundwater analytical data prepared by Treadwell&Rollo Oakland, California dated April 2000, January 2005 and June 2005. Based on these analytical results, the treatment system has been designed to treat groundwater with TPHd at a concentration of 32,000 µg/l, as well as trace amounts of BTEX and TPHg.

3.5 DESCRIPTION OF PROPOSED CLEANUP PROJECT

The construction of the parking garage will include extraction and treatment of groundwater required to facilitate installation. The locations of the planned garage excavation and dewatering wells are shown in Figure 4.

3.6 TOPOGRAPHIC MAP

A topographic map of the site is included with EPA Form 1 in Appendix B.

3.7 EFFLUENT VOLUME AND CONCENTRATION

The system will be operated for the duration of the excavation project. Currently, the construction schedule calls for excavation over a six-month period. Assuming the extraction system is operated twenty-four hours per day for twenty-four weeks over the six-month period, effluent volume will be approximately 40 million gallons. Concentration of TPH in the effluent will be at or less than 50 µg/l.

3.8 RECEIVING WATERS

The ultimate receiving waters for the treatment system effluent discharge will be San Francisco Bay. The treatment system will discharge through a temporary pipe into the storm drain inlet at the south end of the jobsite on Peladeau Street and flow through City of Emeryville storm drains.

3.9 PLANS FOR PREVENTION OF RUN-ON AND RUN-OFF FROM CONTAMINATED SOILS

If petroleum hydrocarbon-impacted soils are detected, then those soils will be placed on and covered with visqueen, characterized, and disposed in compliance with state and federal regulations. Saturated soils will be stored so that leachate can be collected and treated at the treatment system. PSEC is not responsible for the excavation of the site.



3.10 APPLICABILITY OF GENERAL PERMIT TO THIS PROJECT

The project is treating groundwater from documented onsite occurrences of petroleum hydrocarbons in test results. Since the source of the contamination is likely a petroleum hydrocarbon leak site from previous owners, the general permit is applicable

3.11 ADDITIONAL INFORMATION

No additional information is provided.

FIGURES

APPENDIX A

**List of Reclaimed
Water Users**

Reclaimed Water Users

Authorized users of treated groundwater include:

1. Pacific States Environmental Contractors, Inc.
2. DPR Construction Inc.

APPENDIX B
EPA Forms 1 and 2D

APPENDIX C

**Chemical Analysis Results
Of Groundwater Sampling**

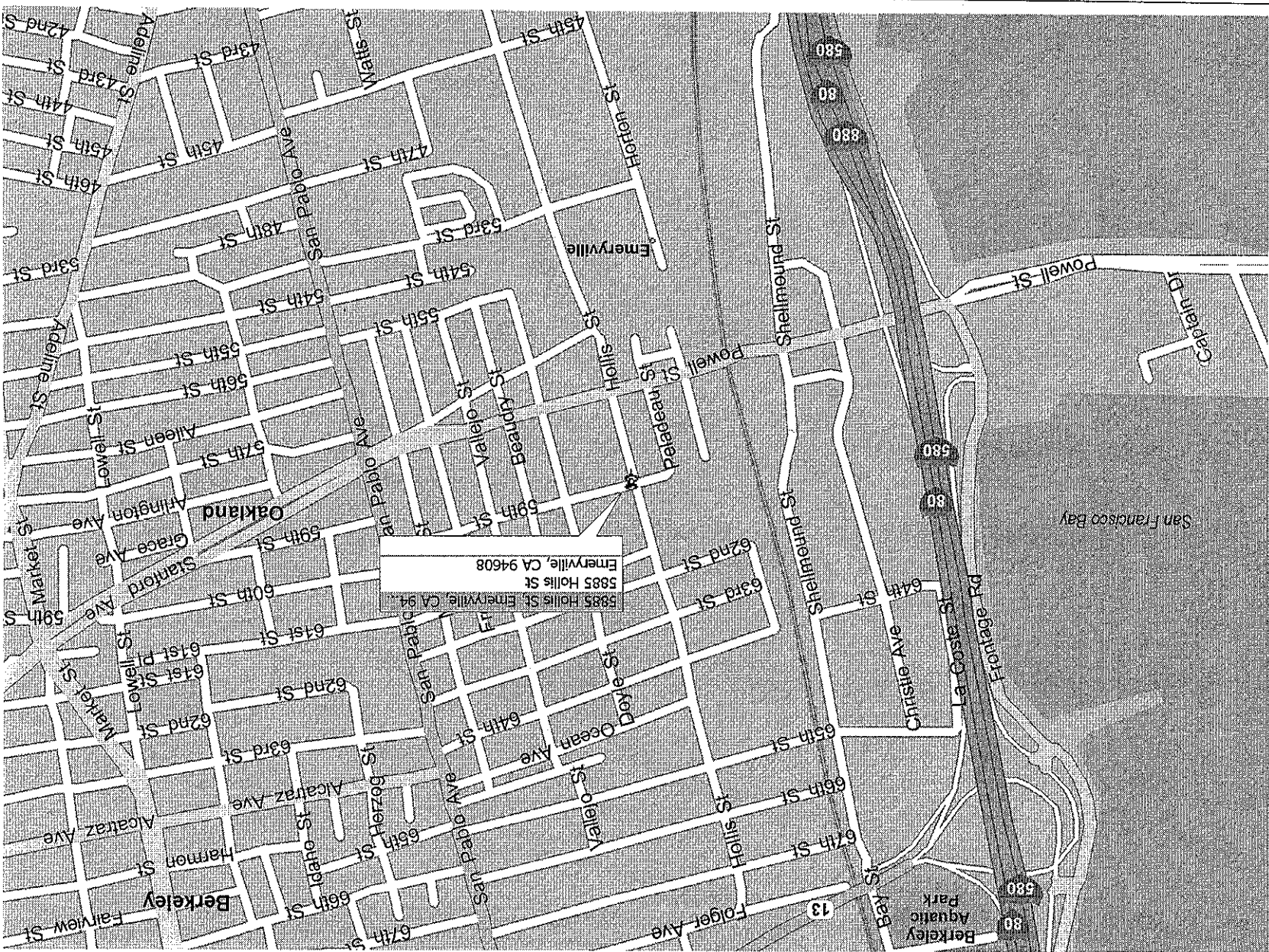
FIGURES

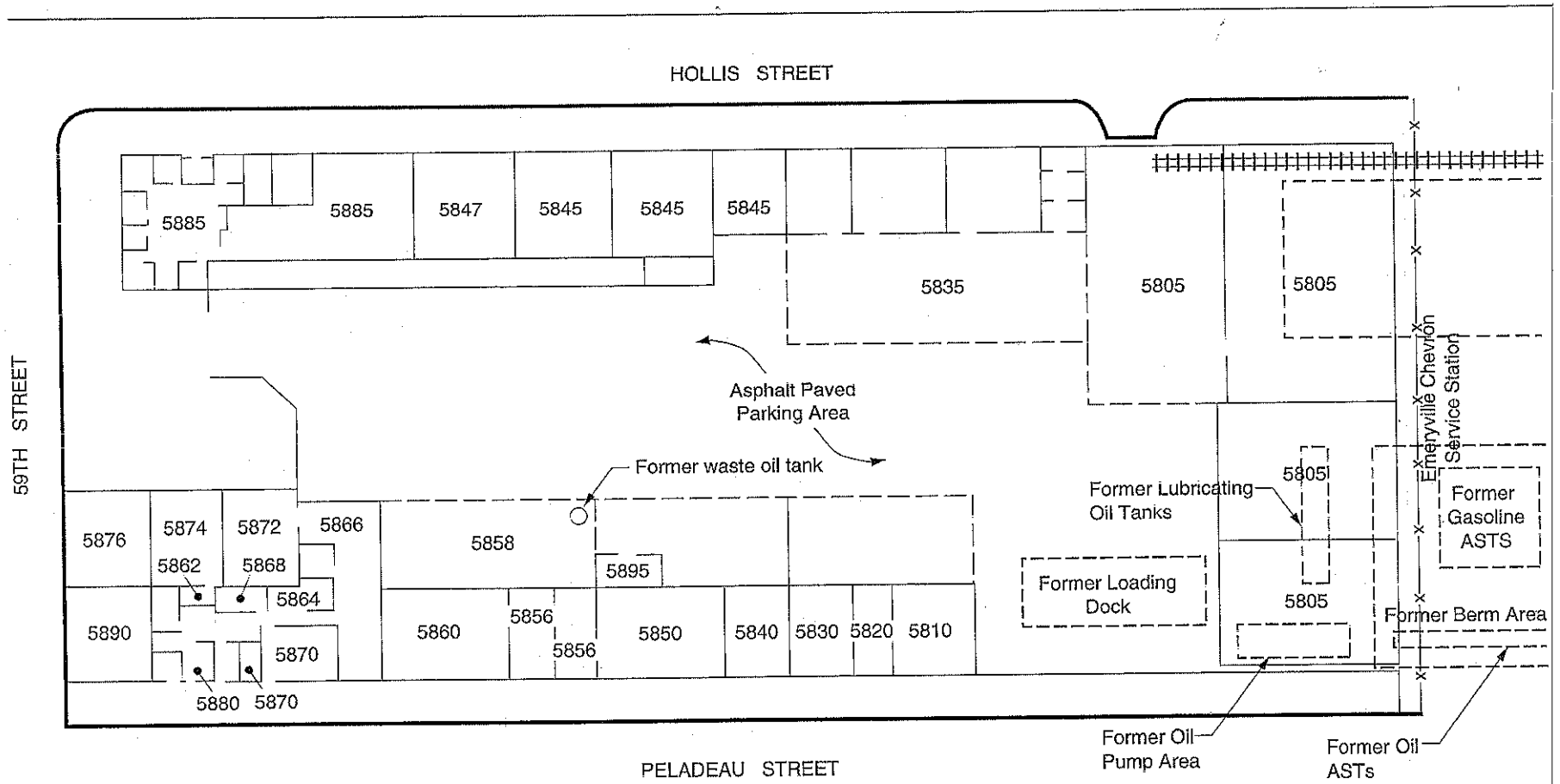


Pacific States
ENVIRONMENTAL CONTRACTORS, INC.
California Contractor License #723241 A-HAZ

Site Location Map

5885 Hollis Street
Emeryville, CA





EXPLANATION:

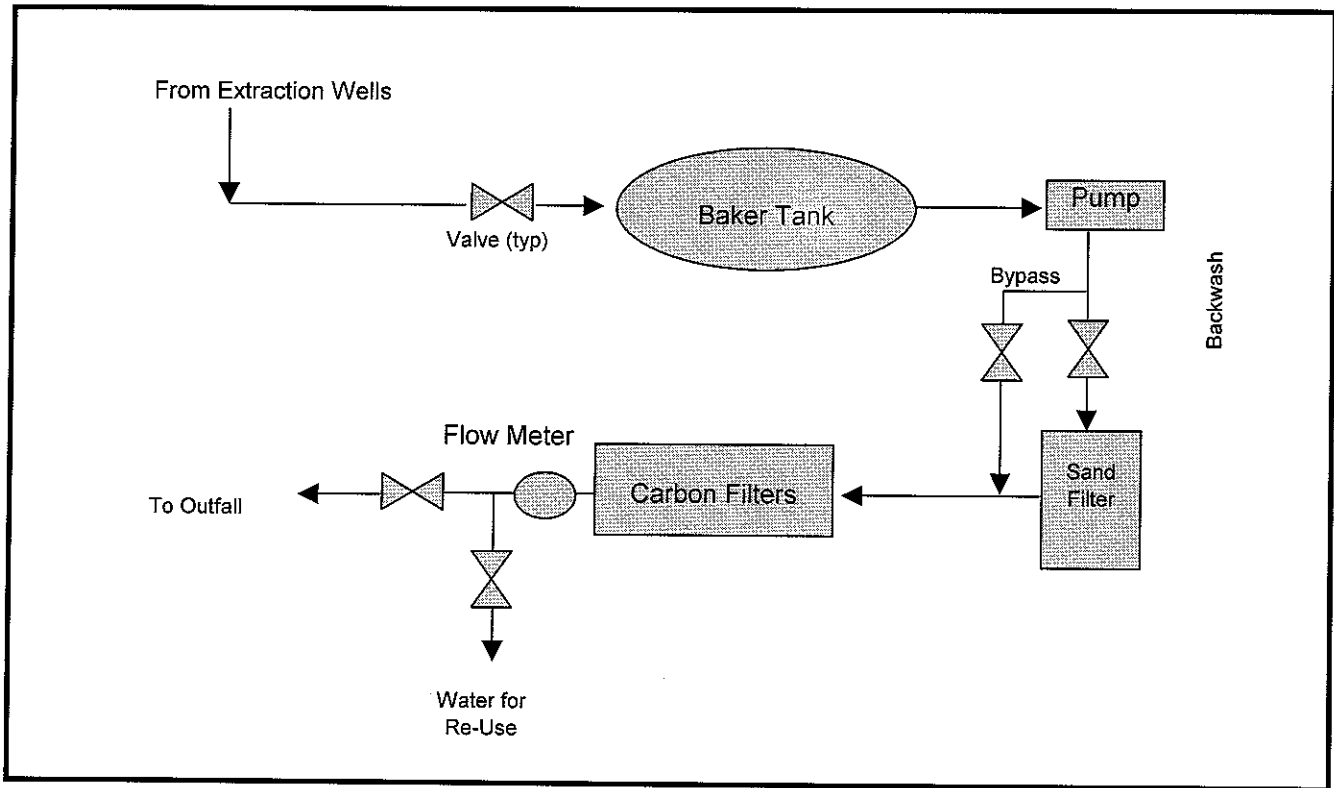
[- - - -] Approximate location of Union Oil or California Operations


5885 HOLLIS STREET
Emeryville, California



Site Plan
5885 Hollis Street
Emeryville, CA

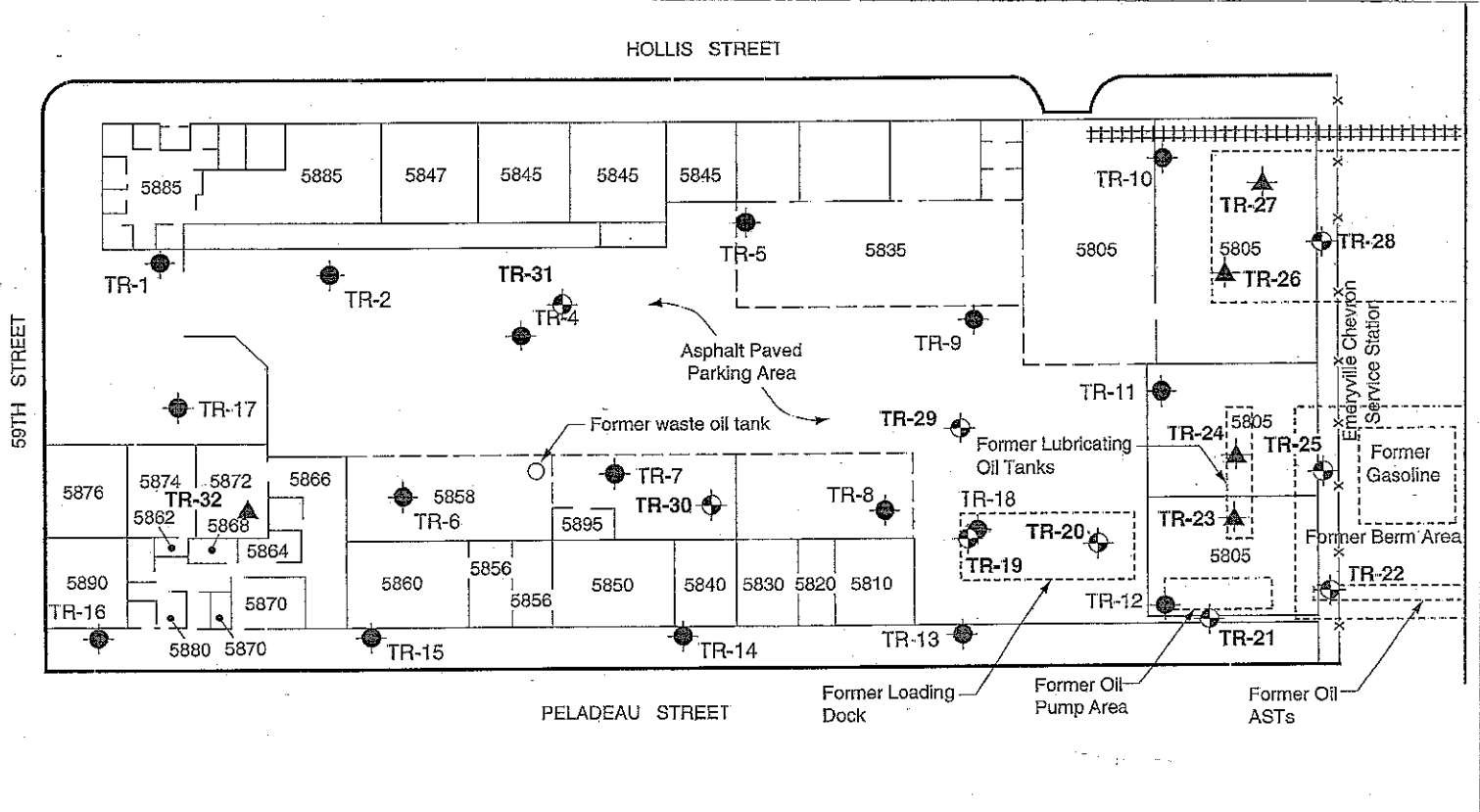
Figure
2




Pacific States
 ENVIRONMENTAL CONTRACTORS, INC.
California Contractor License # 232617 HAZ

Process Flow Schematic
5885 Hollis Street
Emeryville, CA

Figure
3



From Viking Drillers, Inc.

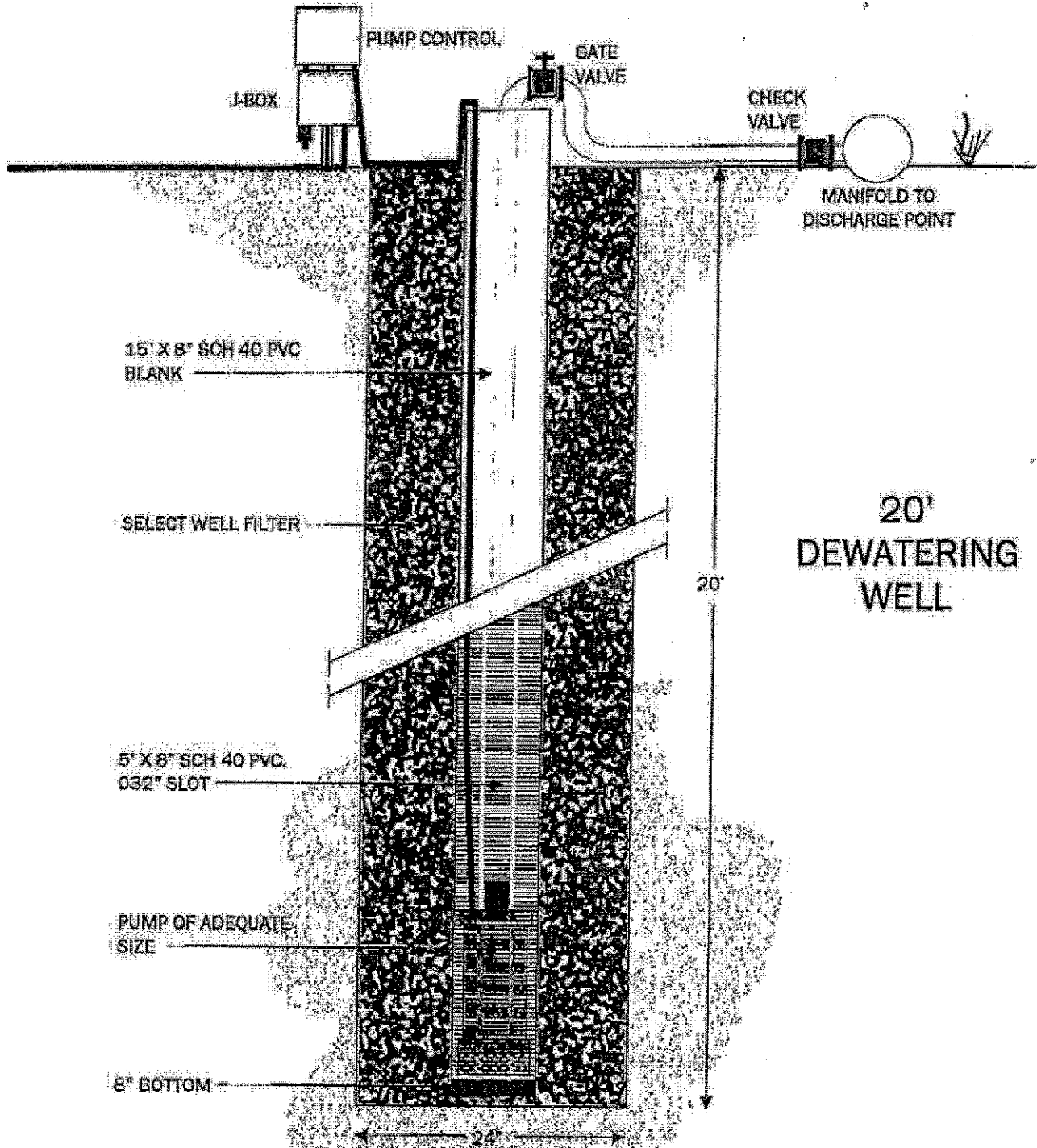
Site Plan Showing Well Locations

5885 Hollis Street
Emeryville, CA



Pacific States
ENVIRONMENTAL CONTRACTORS, INC.
California Contractor License #729241 / HAZ

Figure
4



From Viking Drillers, Inc.

NOT TO SCALE



Pacific States
 ENVIRONMENTAL CONTRACTORS, INC.
 California Contractor License #723241-A HAZ

Dewatering Well

5885 Hollis Street
 Emeryville, CA

Figure

5

APPENDIX A
List of Reclaimed
Water Users

Reclaimed Water Users

Authorized users of treated groundwater include:

- 1 Pacific States Environmental Contractors, Inc.
- 2 DPR Construction Inc.

APPENDIX B
EPA Forms 1 and 2D

FORM 1 GENERAL	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	I. EPA I.D. NUMBER 5 _____ T/A/C F _____ D 1 2 _____ 13 14 15
LABEL ITEMS I EPA I.D. NUMBER III FACILITY NAME V FACILITY MAILING ADDRESS VI FACILITY LOCATION	PLEASE PLACE LABEL IN THIS SPACE	GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	X		X
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	5885 HOLLIS STREET
---	------	--------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
2	GEOFF SEARS - OWNER'S REP	415	457	4964

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3	1120 Nye Street		
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4	San Rafael	CA	94901

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
5	5885 Hollis Street				
B. COUNTY NAME					
Alameda					
C. CITY OR TOWN			D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6	Emeryville		CA	94608	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	E	(specify)		C	E	(specify)	
7	7			7	7		
C. THIRD				D. FOURTH			
C	E	(specify)		C	E	(specify)	
7	7			7	7		

VIII. OPERATOR INFORMATION

A. NAME
 Pacific States Environmental Contractors, Inc.

B. Is the name listed in Item VIII-A also the owner?
 YES NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
 F = FEDERAL M = PUBLIC (other than federal or state)
 S = STATE O = OTHER (specify)
 P = PRIVATE P (specify)

D. PHONE (area code & no.)
 925 803 4333

E. STREET OR P.O. BOX
 11555 Dublin Blvd

F. CITY OR TOWN
 Dublin

G. STATE
 CA

H. ZIP CODE
 94568

IX. INDIAN LAND
 Is the facility located on Indian lands?
 YES NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
C	T	I		C	T	I	
9	N			9	P		
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
C	T	I		C	T	I	
9	U			9			(specify)
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
C	T	I		C	T	I	
9	R			9			(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Construction

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print) Geoff Sears	B. SIGNATURE	C. DATE SIGNED
--	---------------------	-----------------------

COMMENTS FOR OFFICIAL USE ONLY

C

Please type or print in the unshaded areas only

EPA ID Number (copy from Item 1 of Form 1)

Form 2D NPDES

EPA Application for Permit to Discharge Process Wastewater

New Sources and New Dischargers

I. Outfall Location

For each outfall, list the latitude and longitude, and the name of the receiving water.

Outfall Number (list)	Latitude			Longitude			Receiving Water (name)
	Deg	Min	Sec	Deg	Min	Sec	
1	37	84	06	122	28	98	San Francisco Bay

II. Discharge Date (When do you expect to begin discharging?)

III. Flows, Sources of Pollution, and Treatment Technologies

A. For each outfall, provide a description of (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and stormwater runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

Outfall Number	1 Operations Contributing Flow (list)	2. Average Flow (include units)	3 Treatment (Description or List Codes from Table 2D-1)
1	Excavation Dewatering	150 gpm	1U" 1-R*; 2-A *Sand Filter

B. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item III-A. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

C. Except for storm runoff, leaks, or spills, will any of the discharges described in item III-A be intermittent or seasonal?

Yes (complete the following table) No (go to item IV)

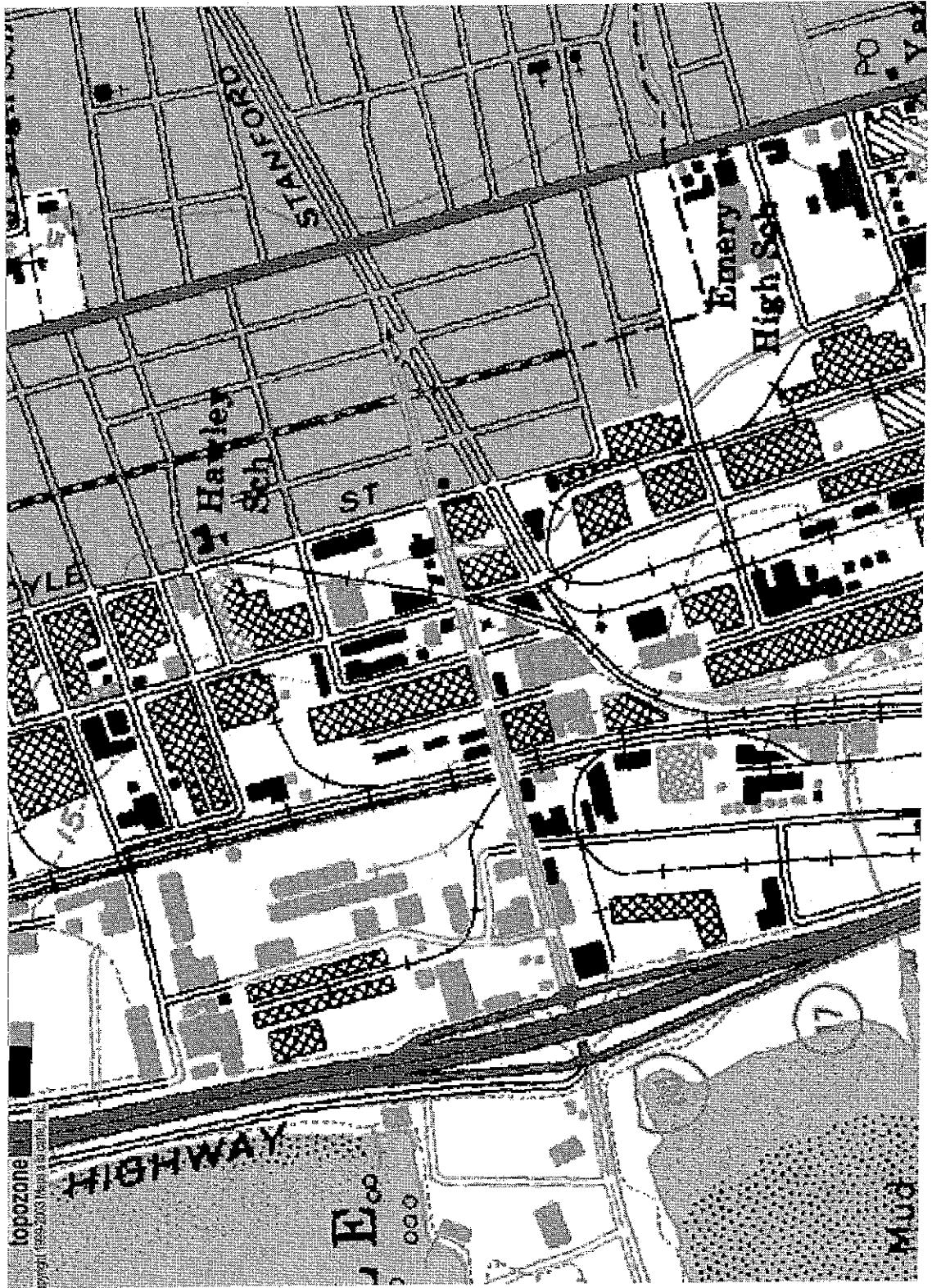
Outfall Number	1. Frequency		2. Flow		
	a. Days Per Week (specify average)	b. Months Per Year (specify average)	a. Maximum Daily Flow Rate (in mgd)	b. Maximum Total Volume (specify with units)	c. Duration (in days)
1	7	6	.216	40 million gallons	120+/-

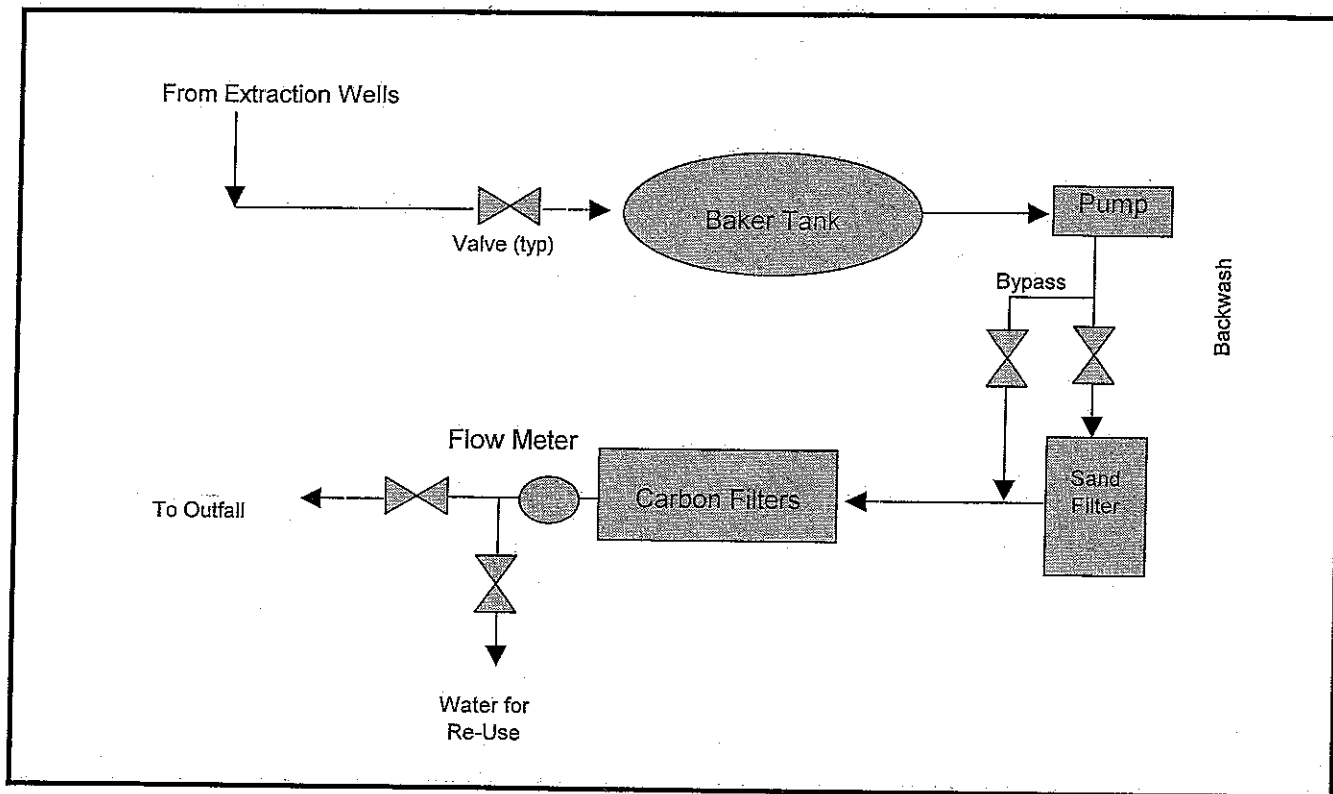
IV. Production

If there is an applicable production-based effluent guideline or NSPS, for each outfall list the estimated level of production (projection of actual production level, not design), expressed in the terms and units used in the applicable effluent guideline or NSPS, for each of the first 3 years of operation. If production is likely to vary, you may also submit alternative estimates (attach a separate sheet).

Year	a. Quantity Per Day	b. Units of Measure	c. Operation, Product, Material, etc (specify)

5885 Hollis Street
Emeryville, CA
TOPOGRAPHIC MAP





Pacific States
 ENVIRONMENTAL CONTRACTORS, INC.
 California Contractor License #723241 - A-HAZ

Process Flow Schematic
 EPA NPDES Form 2D
 5885 Hollis Street
 Emeryville, CA

Figure
 1

V. Effluent Characteristics

A, and B: These items require you to report estimated amounts (both concentration and mass) of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

Each part of this item requests you to provide an estimated daily maximum and average for certain pollutants and the source of information. Data for all pollutants in Group A, for all outfalls, must be submitted unless waived by the permitting authority. For all outfalls, data for pollutants in Group B should be reported only for pollutants which you believe will be present or are limited directly by an effluent limitations guideline or NSPS or indirectly through limitations on an indicator pollutant.

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
BOD	N/A		
COD	N/A		
TOC	N/A		
TSS	20mg/L	12mg/L	3
Flow	0.220 mgd	0.216 mgd	2
Ammonia	N/A		
Temperature	20 deg C	18.6 deg C	1
pH	7.2	6.80	1

C. Use the space below to list any of the pollutants listed in Table 2D-3 of the instructions which you know or have reason to believe will be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it will be present.

1. Pollutant

2. Reason for Discharge

VI. Engineering Report on Wastewater Treatment

A. If there is any technical evaluation concerning your wastewater treatment, including engineering reports or pilot plant studies, check the appropriate box below.

Report Available

No Report

B. Provide the name and location of any existing plant(s) which, to the best of your knowledge, resembles this production facility with respect to production processes, wastewater constituents, or wastewater treatments.

Name

Location

VII. Other Information (Optional)

Use the space below to expand upon any of the above questions or to bring to the attention of the reviewer any other information you feel should be considered in establishing permit limitations for the proposed facility. Attach additional sheets if necessary.

VIII. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A Name and Official Title (type or print)

Geoff Sears

B Phone No

415-457-4964

C Signature

D Date Signed

APPENDIX C

**Chemical Analysis Results
Of Groundwater Sampling**

**TABLE 3
SUMMARY OF GROUNDWATER SAMPLE DATA - ORGANICS
5885 Hollis Street
Emeryville, California**

Sample ID	Sample Date	TPHd ug/l	TPHmo ug/l	TPHg ug/l	Benzene ug/l	Toluene ug/l	Ethylbenzene ug/l	m,p-Xylene ug/l	o-Xylene ug/l	Isopropylbenzene ug/l	Propylbenzene ug/l	1,3,5-Trimethylbenzene ug/l	1,2,4-Trimethylbenzene ug/l	sec-Butylbenzene ug/l	Naphthalene ug/l	Acetone ug/l	Other VOCs ug/l
TR-1	4/6/2000	130	ND	98	--	--	--	--	--	--	--	--	--	--	--	--	ND (8010)
TR-5	4/5/2000	ND	1,400	ND	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 100	ND (8260)
TR-9	4/6/2000	ND	420	ND	--	--	--	--	--	--	--	--	--	--	--	--	--
TR-12	4/6/2000	700	ND	3,300	--	--	--	--	--	--	--	--	--	--	--	--	--
TR-23 (GW)	6/20/2005	8,400 L Y	--	28,000	4,300	< 25	990	300	< 25	120	240	45	160	< 25	380	< 500	ND (8010)
TR-24 (GW)	6/15/2005	6800 L	--	91000 Y	2500	31	950	380	380	210	110	290	43	70	710	35	ND (8260)
TR-25 (GW)	1/20/05	NA	NA	150,000 Y	2,500	< 10	3,600	1,100	620	--	--	--	--	--	--	--	**
TR-29 (GW)	1/20/05	280 H Y	340 L	< 50	< 0.5	0.61 C	< 0.5	0.60 C	< 0.5	--	--	--	--	--	--	--	--
TR-30 (GW)	1/20/05	640 H Y	960	< 50	< 0.5	0.85 C	< 0.5	0.85 C	< 0.5	--	--	--	--	--	--	--	--
TR-31 (GW)	1/20/05	270 H Y	1,500	< 50	< 0.5	0.56 C	< 0.5	0.57 C	< 0.5	--	--	--	--	--	--	--	ND
Maximum		8400	1500	150000	4300	31	3600	1100	620	210	240	290	160	70	710	35	ND
ESL (Table E-1a) Residential - high permeability*		500	640	500	540	380,000	170,000	160,000	160,000	NA	NA	NA	NA	NA	3,200	53,000,000	NA
ESL (Table E-1a) Commercial - high permeability*		640	640	500	1,800	380,000	170,000	160,000	160,000	NA	NA	NA	NA	NA	11,000	150,000,000	NA
Maximum vs. Residential ESL		Exceeds ESL	Exceeds ESL	Exceeds ESL	Exceeds ESL	Less than ESL	Less than ESL	Less than ESL	Less than ESL	NA	NA	NA	NA	NA	Less than ESL	Less than ESL	ND
Maximum vs. Commercial ESL		Exceeds ESL	Exceeds ESL	Exceeds ESL	Exceeds ESL	Less than ESL	Less than ESL	Less than ESL	Less than ESL	NA	NA	NA	NA	NA	Less than ESL	Less than ESL	ND

Notes:
 Results presented in units indicated at top of table.
 ug/l = micrograms per liter (parts per billion)
 TPHg = Total Petroleum Hydrocarbons quantified as gasoline
 TPHd = Total Petroleum Hydrocarbons quantified as diesel fuel
 TPHmo = Total Petroleum Hydrocarbons quantified as motor oil
 VOCs = Volatile Organic Compounds (see laboratory data sheets for complete list of VOCs analyzed)
 < l = indicates not detected at the indicated laboratory detection limit
 ND = Not detected at or greater than the laboratory detection limit which varies, see laboratory report
 C = Presence confirmed, but RPD (Relative Percent Difference) between columns exceeds 40%
 Y = Laboratory flag indicating sample exhibits chromatographic pattern which does not resemble standard
 H = Laboratory flag indicating heavier hydrocarbons contributed to quantitation
 L = Laboratory flag indicating lighter hydrocarbons contributed to quantitation
 NA = not analyzed