September 22, 1995 **Dictated but not read**

Mr. Steve Morse
Division Chief
Toxics Clean Up Division
California Regional Water Quality Control Board
2101 Webster Street
Oakland, CA 94612

VIA FACSIMILE
510-286-1380

Subject: Airport Plaza Shopping Center
Workplan review
CRWQCB File No. 01-0413 (ES)

Dear Mr. Morse:

This letter is to follow up our telephone conversation this morning regarding the above referenced project. My client is the trustee for the owner of the property. The owner of the property has been put on notice to perform certain investigative and remedial activities for groundwater contamination which has been discovered below their property. My firm has been working with Eddy So to develop a workplan for these activities. The initial workplan submittal was completed on March 20, 1995, and a number of subsequent revisions have been made. The revisions included both technical changes and functional changes. Based on my conversation this week with Eddy So, we have been verbally notified that our work plan is approved.

Recently, the owner of the property had discussions with the current lender, who is also the former owner of the property. During our cost estimating which occurred during the preparation of the work plan, the owner became quite concerned with the potential costs associated with its initiation. The property's lender is increasingly becoming involved in this project. They have engaged the services of both legal and environmental consultants to advise them on this situation. The lender would like to have an opportunity to discuss the workplan with the Regional Quality Control Board before actual drilling onsite. Accordingly, I have been asked to arrange the meeting that we discussed this morning.

I know that Eddy So is very concerned with the time delays that have been experienced thus far in developing a work plan for the project. Please be assured that I will continue to move forward in preparing for the planned work activities by completing the bidding process, developing a work scope for traffic control, coordinating the asbestos removal and subsequent demolition of the building to accommodate some of the soils borings beneath the building.

VAN BRUNT ASSOCIATES 1517 N. Main St. • Suite 204 • Walnut Creek, CA 94596 • Phone 510•685•5900 • Fax 510•945•0606

Thank you for agreeing to meet with me and the lender's consultants this coming Monday, September 25 at 10:00 in your office. Madhulla Logan from the Alameda County Health Department and Hugh Murphy from the Hayward Fire Department will be invited. It is my understanding that Eddy So might be available from your office, and I would anticipate Ron Helm from Lowney Associates to participate as a representative for the lender, and James Crafts, Esq, Co-Trustee of the Adolph P. Schuman Marital Trust to be in attendance as well.

If you have any questions, please feel free to call.

Sincerely,

VAN BRUNT ASSOCIATES

Mike Van Brunt (79)

Michael W. Van Brunt
Principal

MVB:tg
94502.41

cc: James Crafts, Esq., Adolph P. Schuman Marital Trust
Ron Helm, Lowney Associates
Madhulla Logan, Alameda County Health Department
Hugh Murphy, Hayward Fire Department
Eddy So, California Regional Water Quality Control Board
Mike Wallace, Fremont Bank

September 14, 1995 **Dictated but not read**

Mr. Eddy P. So, P. E., CHMM
Associate Water Resources Control Engineer
California Regional Water Quality Control Board
CRWQCB-San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

VIA FACSIMILE
510-286-1380

Subject: 239 Hesperian Boulevard, Hayward
Remedial Action Workplan
Proposed meeting, September 20, 1995

Dear Mr. So:

I am out of my office on business until September 19. I called in for messages and learned that you called today. You inquired as to the status of my proposed September 20 meeting to kick off the project. It was my understanding as of Monday, since I could not meet with you until next week, that you were considering meeting with only Mr. Crafts. I advised Mr. Crafts and the property lender of this, since there are a number of people that Mr. Crafts is relying on while pursing this project.

Because of the varying and conflicting schedules, it has taken some coordination to ensure that everyone who needs to attend has an open calendar. I suggested the 20th in hopes that it was available on your calendar. In the meantime, I have been told by the property lender that the Wednesday, September 20 date is not a good day. We still feel that it would be beneficial to meet and would like to do so as soon as possible. Perhaps we can schedule it for Thursday or Friday next week. It may be easier if my office coordinates the availability of our participants. Please advise my office as to your preferred dates and times late next week.

Sincerely,

VAN BRUNT ASSOCIATES

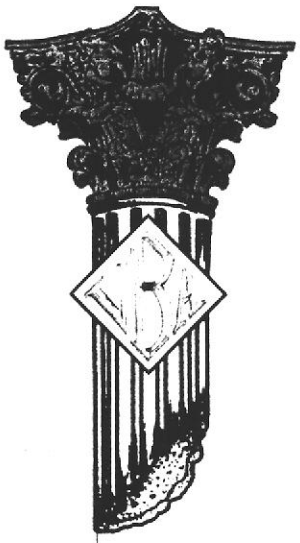
Mike Van Brunt 79

Michael W. Van Brunt
Principal

MVB:tg
94502.38

cc: Jim Crafts
Mike Wallace
Madhulla Logan

VAN BRUNT ASSOCIATES 1517 N. Main St. • Suite 204 • Walnut Creek, CA 94596 • Phone 510•685•5900 • Fax 510•945•0606



September 15, 1995

Mr. James Crafts, Esq. Co Trustee
Adolph P. Shuman Marital Trust
400 Sansome Street
San Francisco, CA 94111

Dear Mr. Crafts:

Enclosed are revisions to the work plan for 239 Hesperian Boulevard in Hayward. Please insert these pages into the work plan revision dated August 28, 1995.

I have also enclosed a full-sized set of drawings from Section 11 (drawings A1, A2, A3 revised August 28, 1995).

If you have any questions, please feel free to call.

Sincerely,

VAN BRUNT ASSOCIATES

Mike Van Brunt

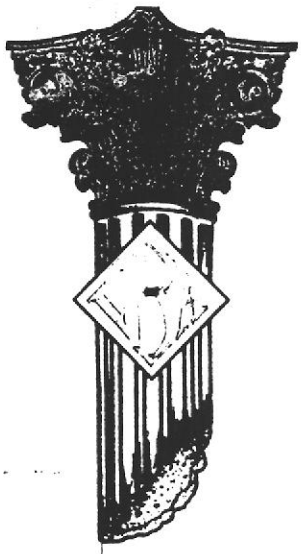
Michael W. Van Brunt
Principal

tg

cc: Mike Wallace, Fremont Bank
Hugh Murphy, Hayward Fire Department
Madhulla Logan, Alameda County Health Dept.

95 SEP 19 PM 1:48
ENVIRONMENTAL PROTECTION

VAN BRUNT ASSOCIATES 1517 N. Main St. • Suite 204 • Walnut Creek, CA 94596 • Phone 510•685•5900 • Fax 510•945•0606



September 8, 1995

Mr. Eddy P. So, P. E., CHMM
Associate Water Resources Control Engineer
California Regional Water Quality Control Board
CRWQCB-San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

Subject: 239 Hesperian Boulevard, Hayward
Remedial Action Workplan
Revision 3, Dated September 8, 1995

Dear Mr. So:

Please find enclosed the revised work plan and full sized drawings (24" x 36" bluelines, sheets A1 through A3 dated September 6, 1995) drafted in conformance with your requests.

We have ameneded the work plan pursuant to our most recent telephone conversation to address a few last items. Specifically, the items that have been amended are as follows:

Reference: Section 5, page 11, Item 5.4 Hydrogeologic Data:

We added language which addresses the specific methodology used by the land surveyor on determining well casing elevations.

Reference: Section 7, drawing 7.11, Monitoring Well Construction Detail

We have changed the 2" monitoring well detail to reflect the correct bentonite spacer location directly below the neat cement annular seal.

Reference: Section 8, page 15, Soil Segregation Table

We have changed the treatment of uncontaminated soil so that it will also be covered with plastic, as you requested.

VAN BRUNT ASSOCIATES 1517 N. Main St. • Suite 204 • Walnut Creek, CA 94596 • Phone 510•685•5900 • Fax 510•945•0606

Reference: Section 8, page 15, Item 8.2 Laboratory Tests for Groundwater

We have changed the typographical error in the last sentence to read Groundwater samples will be analyzed by EPA Method 8010 (instead of Soil samples will be analyzed...).

Reference: Section 9, page 16, Item 9.1 Liquid Waste

The container designation was changed to DOT approved 55-gallon containers.

Reference: Section 11, Sheets A1 through A3 drawings

The new drawings reflect the two added borings at the planter and new legend symbols.

We still have some concerns with regard to the scope of the work and the proposed sampling points. We are hopeful that our hydropunch and other site specific information will permit us to reduce the number of soil samples now scheduled. Additionally, the owners are concerned that those who are responsible for the release of contaminants are not involved in this process or bearing their fair share of the burden and cost.

We would like to meet with you, Anders Lundgren, and Madhulla Logan of Alameda County to discuss these issues before site characterization continues. We will call you for a mutually convenient date and time.

Sincerrely,

VAN BRUNT ASSOCIATES

Michael W. Van Brunt
Principal

MVB:tg
94502.130

Encl.

August 28, 1995

Mr. Eddy P. So, P.E., CHMM
Associate Water Resources Control Engineer
California Regional Water Quality Control Board
CRWQCB-San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

VIA COURIER

Subject: 23958 Hesperian Boulevard, Hayward, CA
Remedial Action Workplan
100% Submittal

Dear Mr. So:

Van Brunt Associates is pleased to submit the attached Revised Remedial Action Workplan for the subject site.. This workplan has been revised pursuant to Mr. Anders Lungren's letter dated August 16, 1995. This workplan includes the requested changes in the number and locations of soil borings, grab water samples and monitoring wells.

This workplan has been designed to:

1) Determine the source(s) of Volatile Organic Compounds (VOC's) found in the local groundwater;

2) Characterize the concentration and extent of residual VOC's in the groundwater;

3) Determine the presence or absence of VOC's in the soil and, if found, the extent of soil impacted;

4) Develop a comprehensive remediation plan for both groundwater and soil;

5) Guide in the preparation and generation of report(s) for the full and complete disclosure of our findings to the authorities having jurisdiction and affected property owner(s); and

6) Assist in implementing an approved remediation plan.

VAN BRUNT ASSOCIATES 1517 N. Main St. • Suite 204 • Walnut Creek, CA 94596 • Phone 510•685•5900 • Fax 510•945•0606

This workplan takes into account regulations promulgated by both your organization and the Alameda County Health Agency.

We intend to proceed as soon as we receive approval from your office and authorization from our client, the owner. This workplan takes into account the information that we have obtained pursuant to our recent Phase I Environmental Audit and Soil Gas Vapor Study.

Do not hesitate to contact us to discuss any necessary modifications to this workplan.

Sincerely,

VAN BRUNT ASSOCIATES

Michael W. Van Brunt
Principal

MVB:lvb
94502.19R
Enclosure

cc w/workplan: James Crafts, Esq., Co-Trustee
Ms. Madhulla Logan, Alameda County Health Agency
Mr. Hugh Murphy, Hayward Fire Department

100% SUBMITTAL
REMEDIAL ACTION WORKPLAN
FOR
THE INVESTIGATION AND REMEDIATION OF VOLATILE ORGANIC COMPOUNDS (VOC'S) FOUND IN GROUNDWATER
AT
AIRPORT PLAZA SHOPPING CENTER
N/W CORNER OF HESPERIAN AND W. WINTON
23958 HESPERIAN BOULEVARD
HAYWARD, CALIFORNIA
CRWQCB FILE 01-0413 (ES)

PREPARED FOR:

California Regional Water Quality Control Board
CRWQCB-San Francisco Bay Region
Mr. Eddy P. So, P.E., CHMM
Associate Water Resources Control Engineer
2101 Webster Street, Suite 500
Oakland, CA 94612

PREPARED BY:

Van Brunt Associates
Michael W. Van Brunt, Principal
Glenn Romig, P.E.
1517 N. Main Street, Suite 204
Walnut Creek, CA 94596
Phone: (510) 685-5900
Fax: (510) 945-0606

Initial Submittal March 1995
Revised July 7, 1995
Revised August 28, 1995

TABLE OF CONTENTS

REPORTS ON AIRPORT PLAZA
23958 HESPERIAN BOULEVARD, HAYWARD, CA

KRAZAN & ASSOCIATES, INC.
Geotechnical Engineering Investigation (October 10, 1984)

KRAZAN & ASSOCIATES, INC.
Letter re Limited Level II ESA (November 8, 1994)

KRAZAN & ASSOCIATES, INC.
Phase I ESA (November 11, 1994)

KRAZAN & ASSOCIATES, INC.
Limited Level II ESA (November 22, 1994)

HAZARDOUS MATERIALS MANAGEMENT PLAN
23958 Hesperian Blvd., Norge Cleaners (July 20, 1994)

VAN BRUNT ASSOCIATES
Phase 1 Environmental Audit (March 10, 1995)

REPORTS ON FORMER TEXACO SERVICE STATION
23990 HESPERIAN BOULEVARD, HAYWARD, CA

HARDING LAWSON ASSOCIATES
Environmental Assessment Report (October 13, 1989)

HARDING LAWSON ASSOCIATES
Quarterly Technical Report, Second Quarter of 1990 (August 30, 1990)

INTERNATIONAL TECHNOLOGY CORPORATION
Excerpt from Report (December 18, 1990)

CEECON
Letter Report Vapor Extraction Test (July 29, 1993)

RESNA
Fourth Quarter 1993 Quarterly Report (December 29, 1993)

TERRA VAC
Dual Vacuum Extraction Remediation
Letter Work Plan (December 14, 1993)
Letter Modification to Work Plan (January 21, 1994)
Drilling Report (February 17, 1994)

TEXACO ENVIRONMENTAL SERVICES
Letter re Groundwater Monitoring & Sampling (June 10, 1994)
Letter re. Groundwater Monitoring & Sampling (August 30, 1994)

1. EXECUTIVE SUMMARY/OBJECTIVES

Groundwater containing measured levels of Tetrachloroethene (PCE) (up to 200 ppb), Trichloroethene (TCE) (up to 70 ppb), Cis, 1, 2-Dichloroethene (up to 50 ppb), and Vinyl Chloride (up to 220 ppb) have been detected in the groundwater below the subject and adjoining properties. The groundwater samples were taken from eight existing monitoring wells shown on Sheet A2. Van Brunt Associates (VBA) has performed several preliminary investigative tasks to support assessing current soil and groundwater quality. These tasks included:

1. A review of all known historical documents pertaining to the site and the adjacent Exxon station;
2. A soil gas survey of the property with 40 sampling points;
3. A field inspection to determine the actual location (as-builts) of the onsite sanitary sewer lines; and
4. Sampling and analysis of all eight Exxon monitoring wells which was performed by Van Brunt Associates in March 1995.

This work has given us helpful preliminary information of the potential onsite groundwater VOC concentrations and some information concerning the extent of the VOC in groundwater.

The first task of our proposed work will be to complete the remedial investigation of the site. The source(s) of the found chlorinated hydrocarbons is believed to be either or both of two historical dry cleaners on the site. This has not been confirmed however by any work performed to date. The lateral extent of impacted groundwater will be identified by both monitoring wells and grab water sample analysis. Soil samples will be obtained to help establish the source or sources of the above measured chlorinated hydrocarbons. Soil sampling and analysis will be performed at each monitoring well and at other selected locations.

Initially, 17 groundwater samples will be obtained using temporary wells and 4 permanent 2-inch monitoring wells that will be installed. Eighteen soil borings will be performed from selected locations to help assess the source or sources of the spill and to discover if significantly impacted soil remains on the site. These 18 soil borings will be sampled at the 1-foot, 4-foot, 8-foot, 14-foot and 18-foot depths as requested. This will generate analytical data for approximately 110 samples. The locations of all proposed monitoring wells, grab water and soil samples is shown on Sheet A3 found in Section 11.

Following the completion of the remedial investigation and report submittal, interim remedial action may be taken to control the migration of the impacted groundwater. Interim remediation could include excavation and removal of impacted soil or vapor extraction, migration control, or other alternatives. We plan on removing the "L"-shaped building (Building 4) to allow for foundation slab demolition to uncover the sanitary sewer lines. These sewer lines are the principal suspect source for the VOC's found in the groundwater. As requested in Anders Lungren's letter, we have added 2 soil borings in the planter areas along Hesperian Boulevard. This interim remediation, if performed, may not have actual clean-up threshold levels set at that time.

The beneficial uses of groundwater at the site will be assessed with the regulatory criteria for impacted soil and groundwater. A risk assessment may be required by Alameda County Health Department based on laboratory results of the soil samples. We will utilize the EPA's risk assessment protocol.

A remediation feasibility study will be performed to evaluate the various alternative corrective action options for impacted soil and groundwater. The options will be evaluated and prioritized on the technical and economic feasibility for remediation to varying concentration levels and their potential impact on beneficial uses.

The corrective action options evaluated may include pump and treat, soil vapor extraction, soil excavation, encapsulation, and other technologies. Our analysis of corrective action options will include the feasibility to:

(a) cleanup to non-detectable concentration;
(b) remediation to concentrations which do not affect groundwater beneficial uses;
(c) remediation to the maximum extent feasible based on economic and technical feasibility; and
(d) no further remediation but continued monitoring.

The corrective action alternatives will be evaluated considering the exposure risk to humans and the environment, the extent of residual ground and surface water pollution, beneficial water uses affected, hazardous nature of each pollutant, the threat of soil contamination to groundwater, water conservation, potential disposal actions and cost.

Corrective remediation will be proposed along with expected achievable remediation levels and treatment processes. A revised schedule for implementation of the selected corrective action will be provided. In addition, a plan for monitoring the effectiveness of the corrective action alternative selected will be developed.

Finally, the selected corrective action will be implemented. A report will be prepared describing how the corrective action was installed and is operating.

Status reports and self-monitoring reports will be provided on a quarterly schedule, or more frequent schedule, as required, especially during the startup period.

Once final remedial levels are reached, or the practical effectiveness of the system is found to provide no further benefit, verification monitoring will be performed for an approved time period to be established in the future. The effectiveness of the corrective action will be evaluated and a recommendation for case closure will be made when appropriate.

A leaking underground storage tank investigation and remediation program is currently active at the adjacent Exxon gasoline station. This workplan is considered compatible with all current and future remediation work for that program.

2. SITE INFORMATION

2.1 Site Address

Airport Plaza Shopping Center
Northwest Corner of Hesperian and W. Winton
23958 Hesperian Boulevard
Hayward, California
APN 432-0060-104-5
APN 432-0060-107-5

Including addresses known as:
23700 Hesperian Boulevard
23956 - 23958 Hesperian Boulevard
975 - 991 W. Winton
969 - 973 W. Winton
23800 - 23882 W. Winton

2.2 Project Directory

Owner: **Adolph P. Schuman Marital Trust** James Crafts, Esq., Co-Trustee 400 Sansome Street San Francisco, CA 94111 Office: (415) 773-5656 Fax: (415) 773-5759	**Lender:** **Fremont Bank** Mike Wallace, EVP P.O. Box 5101 Fremont, CA 94538 Office: (510) 795-5725 Fax: (510) 790-2584
Environmental Consultant: **Van Brunt Associates** Michael W. Van Brunt, Principal Glenn M. Romig P.E. 1517 N. Main Street, Suite 204 Walnut Creek, CA 94596 Office: (510) 685-5900 Fax: (510) 945-0606	**Regional Water Quality Control Board** Mr. Eddy So, P.E., CHMM Associate Water Resources Control Engineer 2101 Webster Street, Suite 500 Oakland, CA 94612 Office: (510) 286-4366 Fax: (510) 286-1380
Alameda County Health Department Ms. Madhulla Logan, M.S. Hazardous Materials Specialist 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502 Office: (510) 567-6700 Fax: (510) 337-9335	**Hayward Fire Department** Inspector Hugh Murphy 25151 Clawiter Road Hayward, CA 94545 Office: (510) 293-8695 Fax: (510) 293-5017

Analytical Laboratory: **American Environmental Network** 3440 Vincent Road Pleasant Hill, CA 94523 Office: (510) 930-9090 Fax: (510) 930-0256	**Vapor Gas Study:** **Transglobal Environmental Geochemistry** Mark Jerpbak P.O. Box 162580 Sacramento, CA 95816 Office: (916) 736-3233 Fax: (916) 452-5806
Excavation Contractor/Hazardous Materials: To be determined	**Waste Hauler:** To be determined
Soil Landfill/Recycler: To be determined	**US Alert:** 1-800-642-2444
Drilling Contractor: To be determined	

2.3 Background

Volatile organic compounds (VOC's) have been detected in the groundwater beneath the subject site and elsewhere in the course of the Texaco gas station subsurface investigation.

Historically, two dry cleaning operations have existed on the subject site which may have caused or contributed to the cause of the findings of VOC's in the groundwater. There is no direct evidence at the present time that the VOC's found in the groundwater were caused by or came from the historical nor current dry cleaning operations on the property.

Prior to the construction of the existing improvements in 1961, the subject site was bare land. Previous to that, the property was part of an orchard. Usually, there are no significant subsurface environmental problems associated with these previous land uses.

There is currently no regulatory agency record of any former UST's on the property. Specifically, the file on this property maintained by the Hayward Fire Department does not contain any reference to an underground storage tank. There are no known regulatory citations, actions, or cases open for the subject property.

Krazan & Associates, Inc. of Sacramento, California, completed a Phase I Environmental Site Assessment on November 11, 1994 for 23700 - 23958 Hesperian Boulevard for the Taco Bell Corporation, a potential occupant for a portion of the site. Taco Bell is considering building a restaurant onsite. Van Brunt Associates has field checked the contents of that report and found it to be thorough, complete, and accurate.

A former Texaco Service Station, now Exxon, is located on the adjacent land on the corner of Hesperian Boulevard and W. Winton Avenue. Groundwater contaminated by petroleum hydrocarbons has migrated laterally from the service station and has impacted the subsurface water of the subject site. This has been determined from a laboratory test of both groundwater (hydropunch) samples and the existing monitoring well on the subject property.

The responsible party (Texaco Refining, Inc.) of the existing Leaking Underground Storage Tanks (LUST) at the adjacent Texaco site (23390 Hesperian) believes that the VOC's found in the several monitoring wells sampled have come from "off site" and suspects the subject site. Groundwater and soil vapor extraction and treatment at the adjacent Exxon service station is presently in operation.

2.4 Surrounding Community

The subject site is located in a commercial/residential setting in the City of Hayward, California. The property is built on Alameda County Assessor's Parcel Number 432-0060-104-5 and 432-0060-107-5. The area is generally commercial with single family residential units in the neighborhood to the east and north of the property. There is vacant lot on the north side of the former Antonio's Restaurant building.

The Hayward General Aviation Airport exists west of Hesperian Boulevard. The subject property is topographically flat.

2.5 Chemicals Historically Used On Site

With the exception of the existing and historical dry cleaners, there are no public records nor uses of the site that would be considered unusual or a risk to the properties environmental liability.

2.6 Site History

Historic Occupancy

Prior to the construction of the current improvements, the property existed as an open field. Prior to 1952, when the area was predominantly agricultural, the property was part of an orchard.

The current improvements were constructed in 1961 (source: historic aerial photo review, and Hayward Planning Department).

The issue of primary environmental concern to the subject site is the presence of volatile organic compounds in the groundwater. Historically, there have been two dry cleaning businesses under different ownership in Building 4. The Polk City Directories in the Hayward Public Library contain business listings for the property from the time of its development until 1976. The Polk Directories also show that the adjacent service station site existed on or before 1956. The Hayward telephone books indicate that the Payless Cleaners at 991 Hesperian existed until 1980. It may be important to note that the dry cleaning businesses at 23958 Hesperian and 991 Winton co-existed for about 10 years, from 1970 to 1980.

Polk Directory Gas Station and Cleaners Addresses

Year	24220 Hesperian	23990 Hesperian	23958 Hesperian	991 Winton
1956-57	Lee's Texaco			
1959		Lee's Texaco		
1964		Lee Alderson Texaco		Payless Cleaners
1965		Lee Alderson Texaco		Payless Cleaners
1967		Bill Cross Texaco		Payless Cleaners
1969		Bill Cross Texaco		Payless Cleaners
1970		Lyons Texaco	Washing Well Self Serve Laundry	Payless Cleaners
1971		Lyons Texaco	Washing Well Self Serve Laundry	Payless Cleaners
1972		Lyons Texaco	Norge Cleaners Self Serve Laundry	Payless Cleaners
1973		Lyons Texaco	Norge Cleaners Self Serve Laundry	Payless Cleaners
1976		Lyons Texaco	Genes Norge Cleaners Dry Cleaners	Payless Cleaners

Note: Hesperian Blvd. experienced a major re-numbering scheme between 1957 and 1959, which may have resulted in the change of address for Lee's service station.

The unoccupied building on the northwest corner of the property was formerly a restaurant called "Antonio's". The building was boarded up at the time of the physical survey, and access was not possible. Fire damage was evident on the north side of the building.

The two building on the northeast section of the property are partially occupied and the signs on the occupied and empty spaces indicate former retail use.

The "L" shaped building (identified as Building 4) on the southwest portion of the property has four occupants.

Address	Tenant Sign	Occupied
975 Winton	The Hunter Lounge	Yes
979 Winton	None	No
981 Winton	None	No
985 Winton	None	No
991 Winton	Canton House Chinese	Yes
23958 Hesperian	Jack's Norge Cleaners Gene's Norge Cleaners	Yes
23956 Hesperian	Howard's Drive-in	Yes

2.7 Current and Future Uses

The property has been dedicated to retail, dry cleaning, and restaurant use since it was developed in 1961. The property is substantially vacant at this time. Future demolition of all buildings is planned. The site is scheduled for a development of similar use such as a strip shopping center, retail and restaurant use.

2.8 Geology/Hydrogeology

The property is located on the alluvial flood plain on the eastern edge of the valley which forms the San Francisco Bay. The near surface materials are composed of low permeability Pleistocene alluvium consisting mostly of poorly consolidated gravely, sandy, silt and silty, sandy, clay.

Test borings have been performed on the property, and the adjacent Exxon service station. Groundwater beneath the subject site occurs at a depth of approximately 20 feet below ground surface.

3. PROJECT SCHEDULE

3.1 Field Work

We anticipate timely authorization by our client to start our work after approval. We estimate our field work will take approximately five weeks.

3.2 Laboratory Analysis

We will use AEN, a State of California accredited laboratory for lab analysis. We will submit all samples with a maximum 10-day turnaround time.

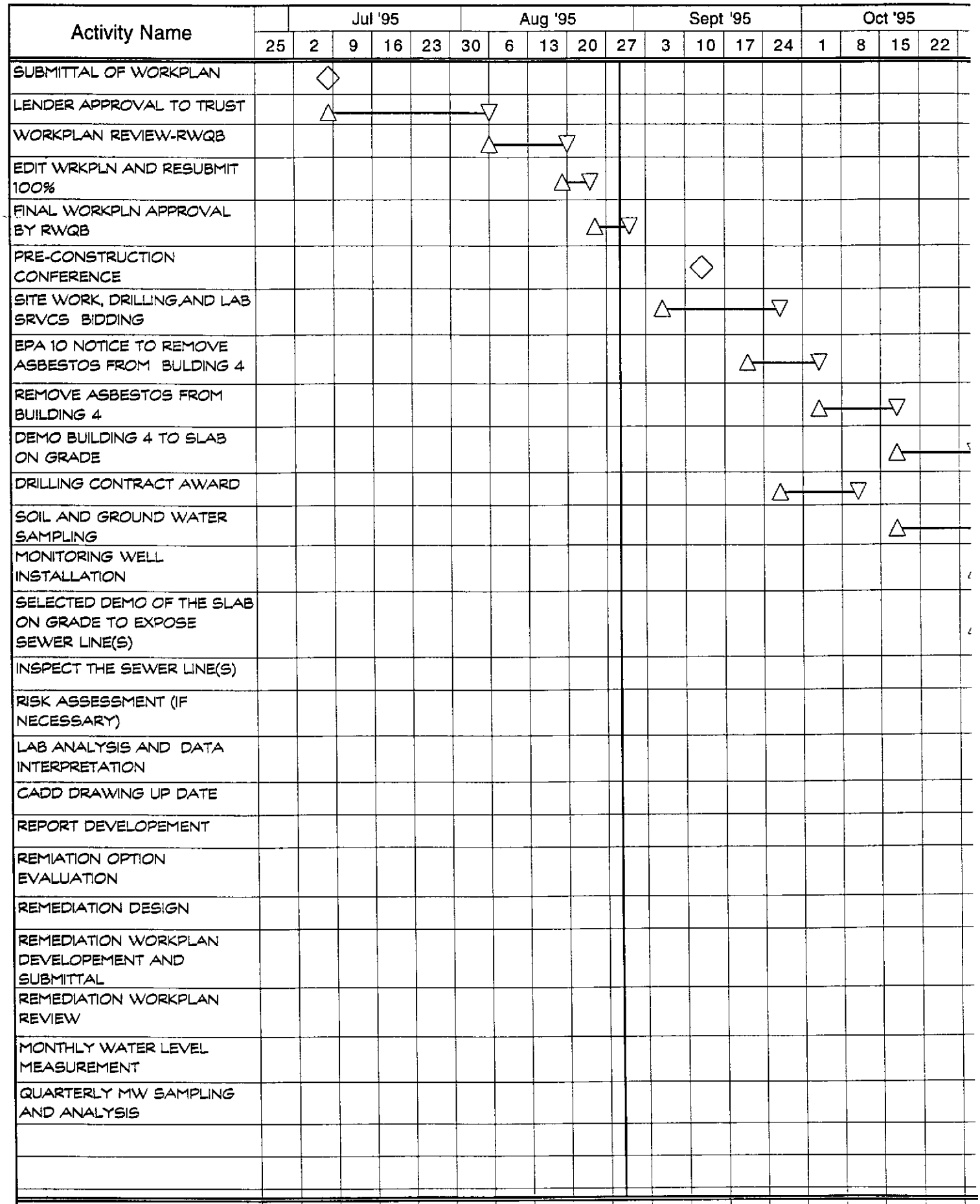
3.3 Report

We will take approximately three weeks for the preparation, checking and submittal of our report.

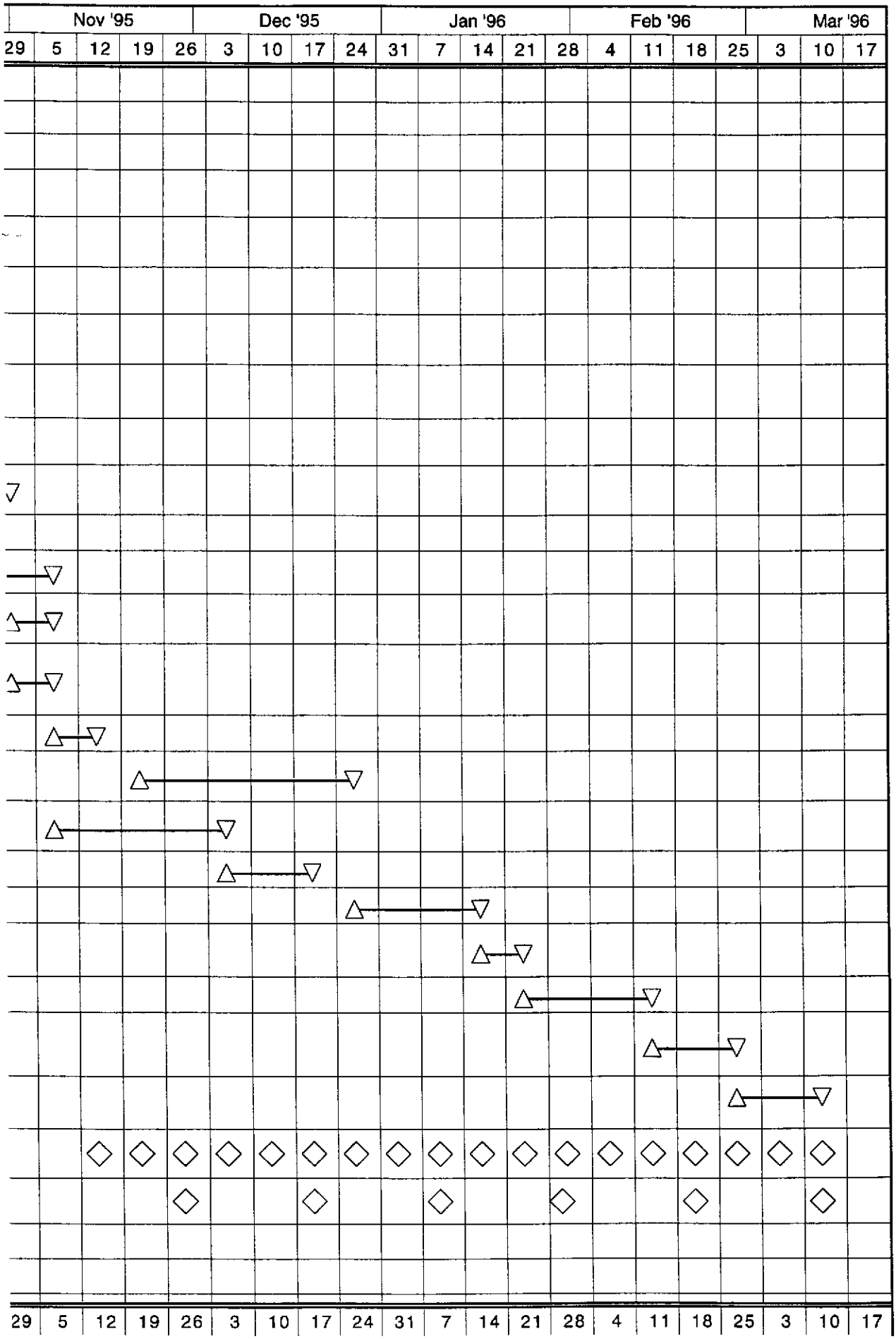
3.4 Bar Chart Schedule

We have attached a conceptual bar chart schedule with a plot date of 8/28/95.

AIRPORT PLAZA S.C PCE INVESTIGATION AND REMEDAITION
CONCEPTUAL SCHEDULE PLOT DATE 8/2895 BY VAN BRUNT ASSOCIATES



PG 2 AIRPORT PLAZA S.C PCE INVESTIGATION AND REMEDAITION
CONCEPTUAL SCHEDULE PLOT DATE 8/2895 BY VAN BRUNT ASSOCIATES



4. PROPOSED SOIL BORINGS AND HYDROPUNCH SAMPLING

4.1 Boring Location Criteria

The locations of the soil borings have been selected based on several factors: (1) known groundwater gradient, (2) the locations of the two suspect sources of VOC's, (3) the location of the existing sewer lines, and (4) CRWQCB and Alameda County Health Department input on soil boring locations.

4.2 Drilling Procedures

At each drilling location, using conventional auger drilling techniques, clean drilling augers and samplers will be used to eliminate the possibility of cross contamination between boreholes. The soil cuttings generated during drilling will be placed in a DOT approved dumpster lined with plastic until receipt of the analytical results. All soil sampling horizons will be field screened utilizing a portable organic vapor analyzer (OVA). The OVA readings guide the location of additional boreholes to define the lateral extent of contamination, and to determine the vertical depth of contamination within the borings.

For each hydraulically pushed boring, soil cuttings are not generated. Accordingly, drums and interim waste storage protocols will not be needed. At the conclusion of each boring using hydraulic methods, the boring devices will be cleaned using standard decontamination methods to avoid cross-contamination.

At the conclusion of drilling and sampling, all test borings will be grouted with neat cement. Cored surfaces will be filled with concrete for appearance and strength.

Soil Sampling at the Suspect Sewer Line

Soil sampling just below the sewer line is planned. This will require demolition of the building and the foundation slab-on-grade. We will sample directly from the trench excavation or as necessary from the backhoe bucket. The backhoe operator will be instructed to obtain a firm, compacted bucket full of soil and remove it rapidly from the hole. Approximately six inches of soil will be scraped away and a clean two-inch diameter by six-inch long brass tube will be driven into the soil. Once removed from the soil, the tube ends will be covered with Teflon tape, capped with non-reactive plastic caps, and sealed with tape. No head space will be allowed in the tubes. Samples will be labeled with a unique sample identification number and placed on dry ice in sealable bags at 4°C for storage pending delivery for laboratory analysis.

Soil Sampling from the Borings

Soil samples will be collected at the 1-foot, 4-foot, 8-foot, 14-foot and 18-foot depths. The samples will be collected in standard 2-inch brass sleeves utilizing a California split spoon sampling device when using auger flight drilling methods. When using hydraulic methods, 1-1/2" brass split spoon sampling devices will be used. Brass sleeves will be sealed with Teflon tape, or other non-reactive material, capped and placed on dry ice in a thermal cooler. All drill cuttings will be logged using the Unified Soil Classification System by the onsite VBA geologist under the direction of a California Registered Geologist. Soil boring logs will be completed and included in a report summarizing the field portion of the project.

5. PROPOSED MONITORING WELL INSTALLATION

5.1 MW/Hydro-Punch Location Criteria

The locations for each of the proposed monitoring wells and grab water samples were carefully selected based on the following information: (1) known groundwater gradient, (2) known historical VOC levels, (3) the location of Exxon monitoring wells, (4) locations that would produce optimum longitudinal and transverse section for chemistry evaluation, and (5) input from CRWQCB.

5.2 Monitoring Well/Hydropunch Drilling Procedures

The proposed monitoring well locations will be field marked prior to drilling so that the underground locating service (USA) can inspect to insure that no utilities will be interrupted. Drilling will be accomplished with an eight-inch hollow stem, continuous flight auger. Auger flights will be cleaned prior to commencement of drilling to preclude the introduction of off-site or cross contamination. All drill cuttings and purge water will be labeled and containerized on-site in DOT approved 55 gallon drums pending laboratory results. The driller will possess a valid California State Water Well Contractors (C57) License. A DWR Water Well Driller's Report, Form 188, and laboratory data for soil and groundwater analytical results will be filed with the Alameda County Flood Control and Water Conservation District (ACWD) within 15 days following completion of the work. All soil borings will be grouted to the surface with a neat Portland Cement slurry.

During monitoring well drilling, a geologist from Van Brunt Associates will direct the field operations and log the auger borings and soil samples as they are obtained using the Unified Soil Classification System. Soil samples will be collected with a hydraulic percussion hammer using a modified California sampler equipped with two inch brass sample tubes. In all hydropunch locations, 1-1/2" brass sampling tubes will be used. After sample collection, the ends of the brass tubes will be covered with Teflon tape, then plastic end caps, and finally wrapped with a non-petroleum containing tape. Soil samples will be immediately plastic bagged to prevent possible dilution, and placed on dry ice for transport to American Environmental Network (AEN) in Pleasant Hill, a California EPA Certified Laboratory. Standard chain of custody procedures will be observed.

5.3 Monitoring Well Construction And Development

Each monitoring well will be constructed of 2" PVC casings with flush thread joints. Under no circumstance will glues or cement be used to join well casing material. The screen slot size and filter material grain size will be field determined based on lithology. The filter material will be washed sand. An annular seal of neat Portland cement will be placed from a bentonite seal to the surface. The seal material will be a batch plant mixed sand/cement slurry consisting of one sack of Portland Type I/II Cement to five gallons of clean water. A tremie pipe will be used for delivery of the grout. The well head will be placed below the surface in a protected vault and secured with a water-tight locking lid. The protective vault will be labeled as a "MONITORING WELL" and well cap will contain information on the well construction. The detail on Sheet 4 shows construction details used for the construction of the combination groundwater/vadose monitoring well. Initial well development will be performed by purging 10 well volumes. Purging will occur 48 hours after construction. Purging will be accomplished using a surge block/pump equipment. Ph, water temperature, and water conductants measurements will be taken prior to each well volume. Well

development for quarterly and other sampling will be taken after purging 4 well volumes and the measured parameters indicate that the samples closely resemble the aquifer. Well development logs will be maintained.

5.4 Hydrogeologic Data

Water level measurements will be taken after well development and prior to well sampling. A California licensed land surveyor will survey all new monitoring well casings.

6. GENERAL SAMPLING PROCEDURES

6.1 Breathing Zone Sampling

The consultant, engineer and other workers in the work area(s) will be periodically monitored at the breathing zone for occupational exposure to VOC's. We intend to monitor by both ambient air sampling by a hand-held Drager Gas measurement system for both Trichloroethene and Vinyl Chloride. Each worker classification will be monitored daily using a gas diffusion detector tube to ensure that regulatory TWA's are not exceeded. These and the other normal site safety considerations will be addressed in our site specific Health and Safety Plan.

6.2 Soil Screening

During the sewer line excavation, contaminated soils removal and soil borings, measurements will be made for concentrations of VOC's.

The soil samples will be measured for total ionizable vapors using an Organic Vapor Analyzer (OVA). This will be done to grossly characterize the vertical and lateral extent of contamination. Soil samples will be collected for OVA screening on approximately three-foot centers for both excavation sidewalls and excavation bottom. The soil readings will be taken at a distance of not greater than three inches from freshly dug soil. The OVA will be calibrated daily using hexane following the manufacturer's recommendations.

6.3 Soil Sampling

Soil samples will be collected at the 1-foot, 4-foot, 8-foot, 14-foot and 18-foot levels above the water table or at changes of lithology. Soil samples will be collected in either standard 1-1/2" or a 2-inch brass sleeves utilizing a California split spoon sampling device based on the drilling method utilized. Brass sleeves will be sealed with Teflon tape, or other non-reactive material, capped and placed on dry ice in a thermal cooler. All drill cuttings will be logged using the Unified Soil Classification System by the onsite VBA geologist under the direction of a California Registered Geologist. A soil boring log will be constructed and included in a report summarizing the field portion of the project.

6.4 Water Sampling

Groundwater is approximately 18 feet below the surface in this area. Our excavation and boring activities will extend to a maximum estimated depth of 25 feet.

Water samples will be collected from both the monitoring wells after well development and the hydropunch locations. We expect one 48 hour period subsequent to well installation for well development prior to sampling. Quarterly and other sampling will be collected from a clean teflon bailer after purging a minimum of 4 well volumes from the well casing. A direct reading instrument will be used to record pH, Temperature and Specific Conductivity to insure parameter stabilization prior to sample collection. Water samples will be transferred directly to VOA vials with Teflon septums or amber bottles and subsequently placed on dry ice and reserved at industry standard temperatures.

6.5 Sample Handling And Shipment

As each sample is collected, necessary information will be logged into the field notebook, and then transferred to the sample label. The label will contain: the sample ID; date and time sampled; location; client; analytical method; and sampler's initials. The labels will be affixed to a clean, dry surface on the sample container. All samples will be immediately transferred to an ice chest containing dry ice and reserved at industry standard temperatures.

Chain-of-custody forms will be filled out as the samples are collected so that samples do not have to be removed from the ice chest except for potential repacking prior to shipment. All field documents, log books, sample labels, and chain-of-custody forms will be filled out legibly in waterproof ink. These documents will be part of the permanent project file report. Samples will be held and transported on dry ice for laboratory analysis.

7. VBA EXAMPLE FIELD FORMS

7.1 Phase II Checklist

7.2 Chain of Custody Form

7.3 Monitoring Well Construction Characteristics

7.4 Field Parameters During Well Purging for Sampling

7.5 Groundwater Elevation Data

7.6 Groundwater Analytical Data

7.7 Standard Soil Classification System

7.8 Example Boring Log Legend

7.9 Example Boring Log

7.10 Example Monitoring Well Boring Log

7.11 Monitoring Well Construction Detail

7.1 EXAMPLE FORM
PHASE II CHECKLIST

CLIENT: JAMES CRAFTS ESQ. -CO TRUSTEE

JOB: CRAFTS /HERSPERIAN

SITE ADDRESS: 23953 HESPERIAN HAYWARD CA.

2 WEEKS	Y	N	NA	Comments	OK
1. **Schedule Driller**					
Name					
Phone:					
Contact:					
Lic. No.:					
Insurance Cert.:					
Date Scheduled:					
Hourly Rate:					
No. Borings:					
Depth:					
Hydro Punch					
2. **Permits**					
Water Quality:					
AQMD:					
Fire:					
Public Works:					
3. **Assign Geologist**					
Glen					
Steve					
4. **Work Plan**					
Cover Letter:					
Workplan:					
Figures:					
Appendices:					

1.5 WEEKS	Y	N	NA	Comments	OK
5. Site Inspection					
Site Access:					
Topo @ Drilling Loc:					
Parking Concerns:					
Stick Tank:					
Open All Ports:					
Mark Boring Locations:					
Measure Site:					
OH Lines:					
Elect. Location:					
Water Location					
Noise Issues					
Ped/Traffic Hazards					
Loc. for Cutting Drums					

1 WEEK BEFORE	Y	N	NA	Comments	O
6. USA Alert:					
7. Management Notification					
Firm:					
Contact:					
Phone:					
Address:					
8. Determine Gradient					
9. Tank					
Drain:					
Triple Rinse:					
10. HASP					

1 DAY BEFORE	Y	N	NA	Comments	OK
11. Barricade:					
12. Parking Spaces:					

OTHER ISSUES	Y	N	NA	Comments	OK
MW CONSTRUCTION IN MEDIAN REQUIRES TRAFFIC CONTROL					
(E) DRUMS FROM KRAZAN WK XTRA LAB AND DISPOSAL COSTS					

LAB TURNAROUND	Y	N	NA	Comments	OK
Lab AEN					
Requested:					
Date of Sample:					
Delivery:					
Turn around time 10 DAY					
Date of Results:					

[redacted] Page [redacted]

American Environmental Network

AEN

3440 Vincent Road, Pleasant Hill, CA 94523
Phone (510) 930-9090
FAX (510) 930-0256

REQUEST FOR ANALYSIS / CHAIN OF CUSTOD

Reporting Information:

1. Client: ______
Address: ______
______
Contact: ______
Alt. Contact: ______

Address Report To:

2. ______
______
______
______

Send Invoice To:

3. ______
______
______
______

Lab Job Number: ______
Lab Destination: ______
Date Samples Shipped: ______
Lab Contact: ______
Date Results Required: ______
Date Report Required: ______
Client Phone No.: ______
Client FAX No.: ______

Send Report To: 1 or 2 (Circle one)

Client P.O. No.: ______ Client Project I.D. No.: ______

Sample Team Member (s) ______

Lab Number	Client Sample Identification	Air Volume	Date/ Time Collected	Sample Type*	Pres.	No. of Cont.	Type of Cont.	ANALYSIS										Comments / Hazards

	DATE	TIME		DATE	TIME
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		

Method of Shipment

Lab Comments

*Sample type (Specify): 1) 37mm 0.8 μm MCEF 2) 25mm 0.8 μm MCEF 3) 25mm 0.4 μm polycarb. filter
4) PVC filter diam. ______ pore size ______ 5) Charcoal tube 6) Silica gel tube 7) Water 8) Soil 9) Bulk Sample

7.3 EXAMPLE FORM

MW PHYSICAL CHARACTERISTICS

CRAFTS/HESPERIAN

Monitoring Well Number	MW-1	MW-2	MW-3	MW-4*
Drilling Date	May 20, 1994	May 19, 1994	May 20, 1994	May 19, 1994
Well Diameter (minimum) (inches)	10.25	10.25	8.0	10.25
Diameter of Casing (inches)	4.00	4.00	2.00	2.00
Total Depth of Well (ft)	23.0	23.0	23.0	35.0
Bottom of Slotted Interval (ft)	23.0	23.0	23.0	23.0
Top of Slotted Interval (ft)	8.0	8.0	8.0	8.0
Depth Datum Reference	Top of Casing	Top of Casing	Top of Casing	Top of Casing
Depth to Free Product (ft)	N/A	N/A	N/A	N/A
Depth to Groundwater (ft) at drilling	8.0	8.0	8.0	22
Groundwater in Well Column (gals)	9.81	9.81	2.43	3.90
Total Water Purged (gals)	≈30.0	≈30.0	50.0	50.0
Manway or Stovepipe	Manway	Manway	Manway	Manway
Water Tight or Not (yes of no)	Yes	Yes	Yes	Yes
Type of Well Column Seal	Expansion Locking	Expansion Locking	Expansion Locking	Expansion Locking

7.4 EXAMPLE FORM

FIELD PARAMETERS DURING WELL PURGING FOR SAMPLING

CRAFTS/HESPERIAN

WELL	SAMPLE DATE	WELL VOLUMES	pH	TEMP °f	CONDUCTANCE µmhos	SAMPLE NUMBER
MW-1	12/08/94	0	7.1	66	1100	
		1	7.1	67	1200	
		2	7.3	67	1200	
		3	7.3	67	1200	VBA 12/08/94-1
MW-2	12/08/94	0	7.6	65	1200	
		1	7.4	64	1200	
		2	7.5	64	1200	
		3	7.5	64	1200	VBA 12/08/94-2
MW-3	12/08/94	0	7.7	74	1200	
		1	7.8	73	1300	
		2	7.7	69	1200	
		3	7.7	69	1200	VBA 12/08/94-3

7.5 EXAMPLE FORM

SUMMARY OF MONTHLY
GROUNDWATER ELEVATION MEASUREMENTS

CRAFTS/HESPERIAN

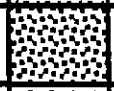
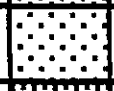
WELL	DATE MEASURED	CASING ELEVATION (ft)	DEPTH TO SWL (ft)	SWL ELEVATION (ft)
MW-1	05/27/94	98.74	8.01	90.73
	07/08/94		8.27	90.47
	08/07/94		8.32	90.42
	09/23/94		8.57	90.17
	10/07/94		8.62	90.12
	11/08/94		7.79	90.95
	12/08/94		7.74	91.00
MW-2	05/27/94	98.67	7.27	91.40
	07/08/94		7.61	91.06
	08/07/94		7.59	91.08
	09/23/94		7.84	90.83
	10/07/94		7.88	90.80
	11/08/94		7.03	91.64
	12/08/94		7.00	91.67
MW-3	05/27/94	98.00	7.86	90.81
	07/08/94		8.10	89.90
	08/07/94		8.17	89.83
	09/23/94		7.39	90.61
	10/07/94		8.33	89.67
	11/08/94		7.63	90.37
	12/08/94		7.62	90.38
MW-4	05/27/94	102.52	11.75	90.77
	07/08/94		11.98	90.54
	08/07/94		12.03	90.49
	09/23/94		12.24	90.28

7.6 EXAMPLE FORM

Table 1
Groundwater Analytical Data
23958 Hesperian Boulevard
Hayward, California

Well Number	Date Sampled	Tetrachloroethene (PCE) (ppb)	Trichloroethene (TCE) (ppb)	Cis, 1, 2-Dichloroethene (ppb)	Vinyl Chloride (ppb)
MW-3A					
MW-3B					
MW-3C					
MW-3D					

UNIFIED SOIL CLASSIFICATION SYSTEM

MAJOR DIVISIONS			TYPICAL NAMES		
COARSE GRAINED SOILS	GRAVEL — MORE THAN HALF OF THE COARSE FRACTION IS LARGER THAN No. 4 SIEVE SIZE	CLEAN GRAVEL WITH LESS THAN 5% FINES	GW		WELL GRADED GRAVEL, GRAVEL-SAND MIXTURE
			GP		POORLY GRADED GRAVEL, GRAVEL-SAND MIXTURE
		GRAVEL WITH OVER 12% FINES	GM		SILTY GRAVEL, GRAVEL-SAND-SILT MIXTURE
			GC		CLAYEY GRAVEL, GRAVEL-SAND-CLAY MIXTURE
	SAND — MORE THAN HALF OF THE COARSE FRACTION IS SMALLER THAN No. 4 SIEVE SIZE	CLEAN SAND WITH LESS THAN 5% FINES	SW		WELL GRADED SAND, GRAVELLY SAND
			SP		POORLY GRADED SAND, GRAVELLY SAND
		SAND WITH OVER 12% FINES	SM		SILTY SAND, GRAVEL-SAND-SILT MIXTURE
			SC		CLAYEY SAND, GRAVEL-SAND-CLAY MIXTURE
FINE GRAINED SOILS — MORE THAN HALF IS < No. 200 SIEVE	SILT AND CLAY — LIQUID LIMIT LESS THAN 50		ML		INORGANIC SILT, ROCK FLOUR, SANDY OR CLAYEY SILT WITH LOW PLASTICITY
			CL		INORGANIC CLAY OF LOW TO MEDIUM PLASTICITY, GRAVELLY, SANDY OR SILTY CLAY (LEAN)
			OL		ORGANIC CLAY AND ORGANIC SILTY CLAY OF LOW PLASTICITY
	SILT AND CLAY — LIQUID LIMIT GREATER THAN 50		MH		INORGANIC SILT, MICACEOUS OR DIATOMACEOUS FINE SANDY OR SILTY SOIL, ELASTIC SILT
			CH		INORGANIC CLAY OF HIGH PLASTICITY, GRAVELLY, SANDY OR SILTY CLAY (FAT)
			OH		ORGANIC CLAY OF MEDIUM TO HIGH PLASTICITY, ORGANIC SILT
HIGHLY ORGANIC SOILS			PT		PEAT AND OTHER HIGHLY ORGANIC SOILS

KEY TO TEST DATA

				Shear Strength, psf	Confining Pressure, psf
EI	- Expansion Index	TxUU	- Unconsolidated Undrained Triaxial	320	(2600)
Consol	- Consolidation	TxCU	- Consolidated Undrained Triaxial	320	(2600)
LL	- Liquid Limit (in %)	DSCD	- Consolidated Drained Direct Shear	2750	(2000)
PL	- Plastic Limit (in %)	FVS	- Field Vane Shear	470	
PI	- Plasticity Index	LVS	- Laboratory Vane Shear	700	
SA	- Sieve Analysis	UC	- Unconfined Compression	2000	*
Gs	- Specific Gravity	UC(P)	- Laboratory Penetrometer	700	*
■	- "Undisturbed Sample"				
□	- Bulk Sample				

Notes: (1) All strength tests on 2.8" or 2.4" diameter samples unless otherwise indicated

* Compressive Strength

Project: EXAMPLE	VAN BRUNT ASSOCIATES	Figure 00

Project: Example-standard boring legend

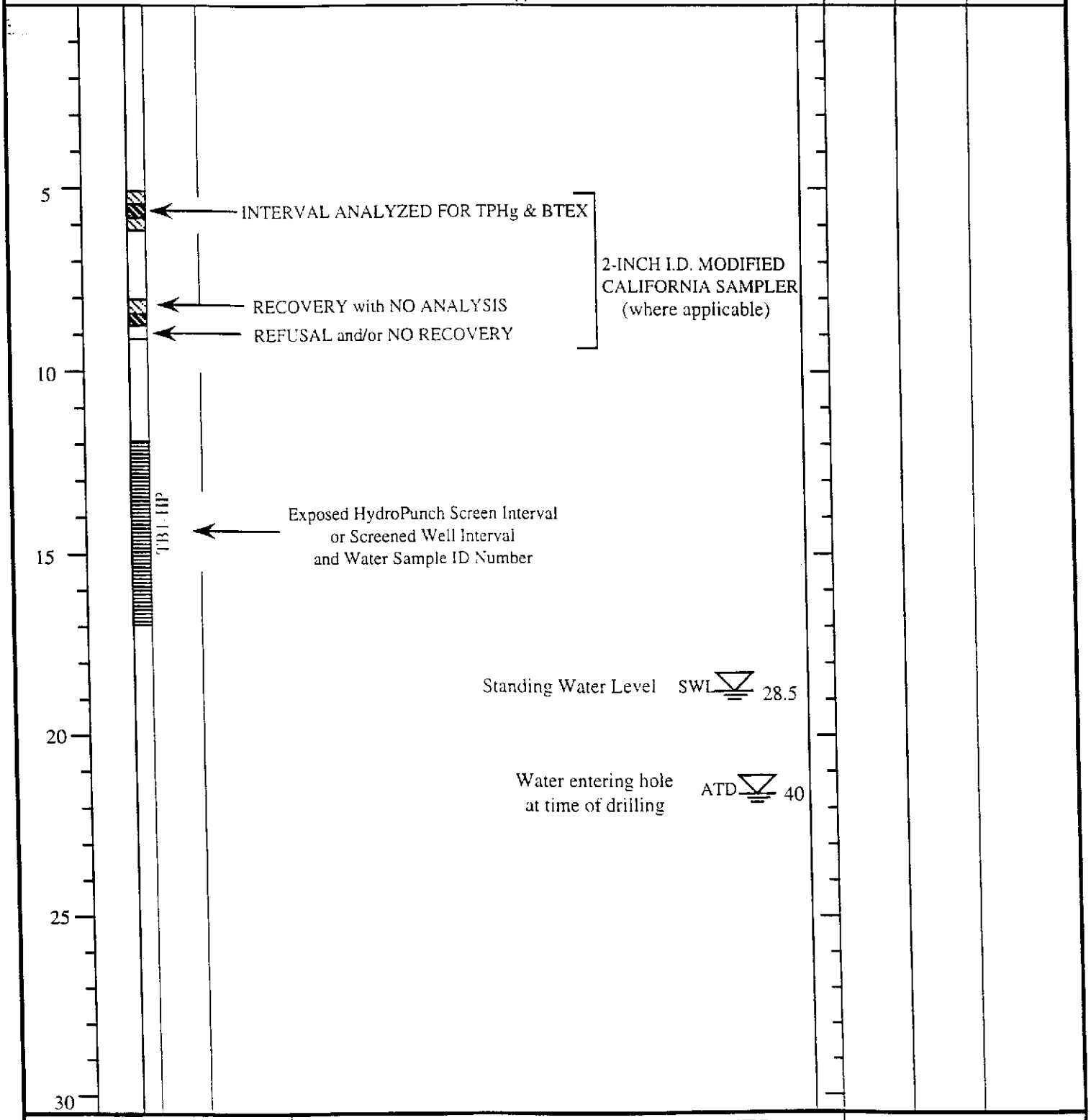
BORING LOG LEGEND SHEET

Date Drilled: _____ Remarks: _____

Type of Boring: _____

Hammer Weight: _____

Depth, Ft.	Samples	Blows/Ft	DESCRIPTION	PRODUCT "A" ppm	PRODUCT "B" ppm	Comments
			Surface Elevation: Approx. 158 feet			



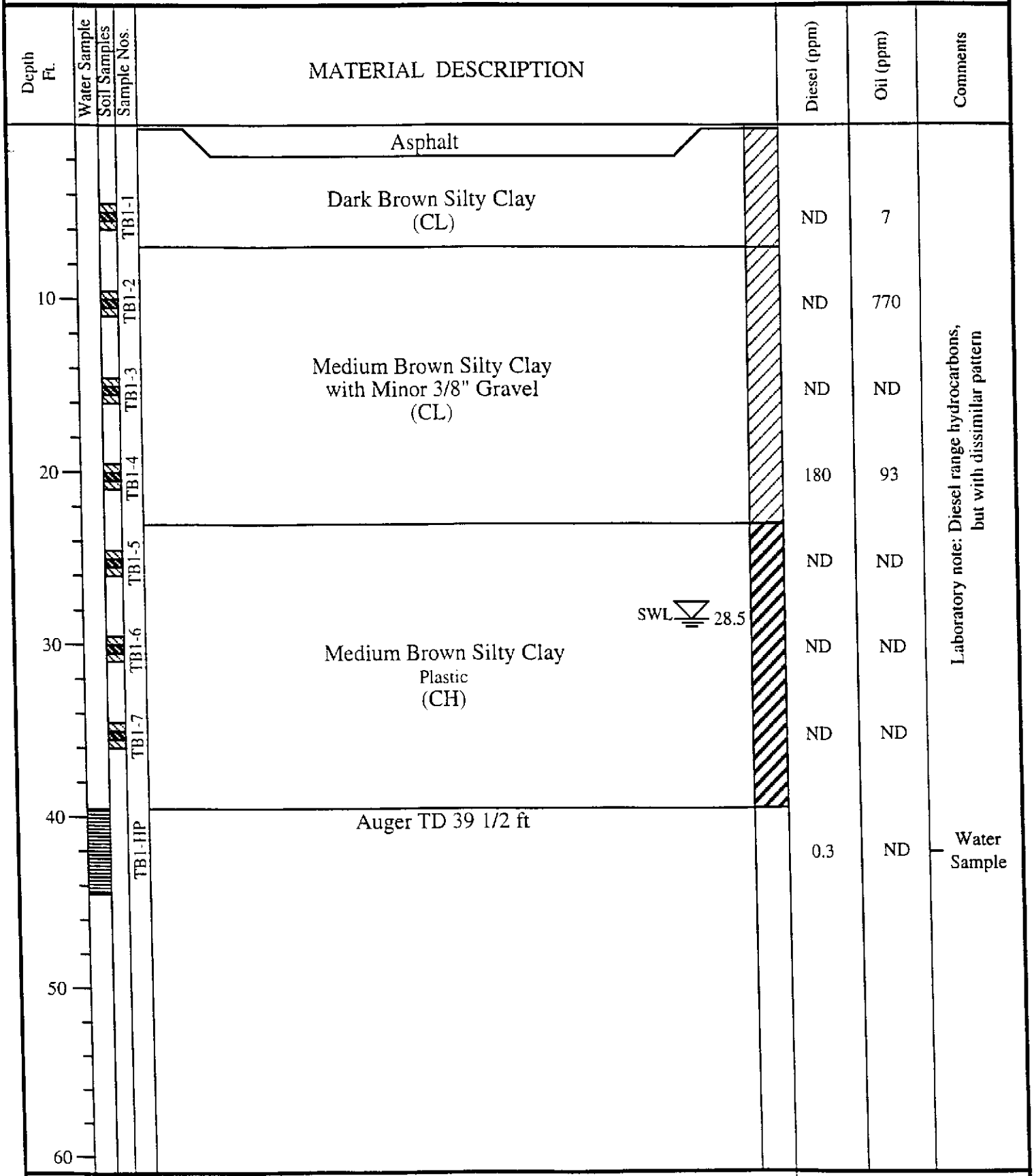
Project: EXAMPLE	VAN BRUNT ASSOCIATES	Figure 00

Project: EXAMPLE BORING LOG

Log of Test Boring TB-1

Date Drilled/Sampled: November 13, 1993
Type of Boring: 6 " Solid stem auger
Sample Method: Ca. Split Spoon

Remarks: Vertical datum - Ground Surface
Driller: ABC Corp. Start: Finish:
Logged by: S. R. Clark Reviewed by: Glen M. Romig P.E.

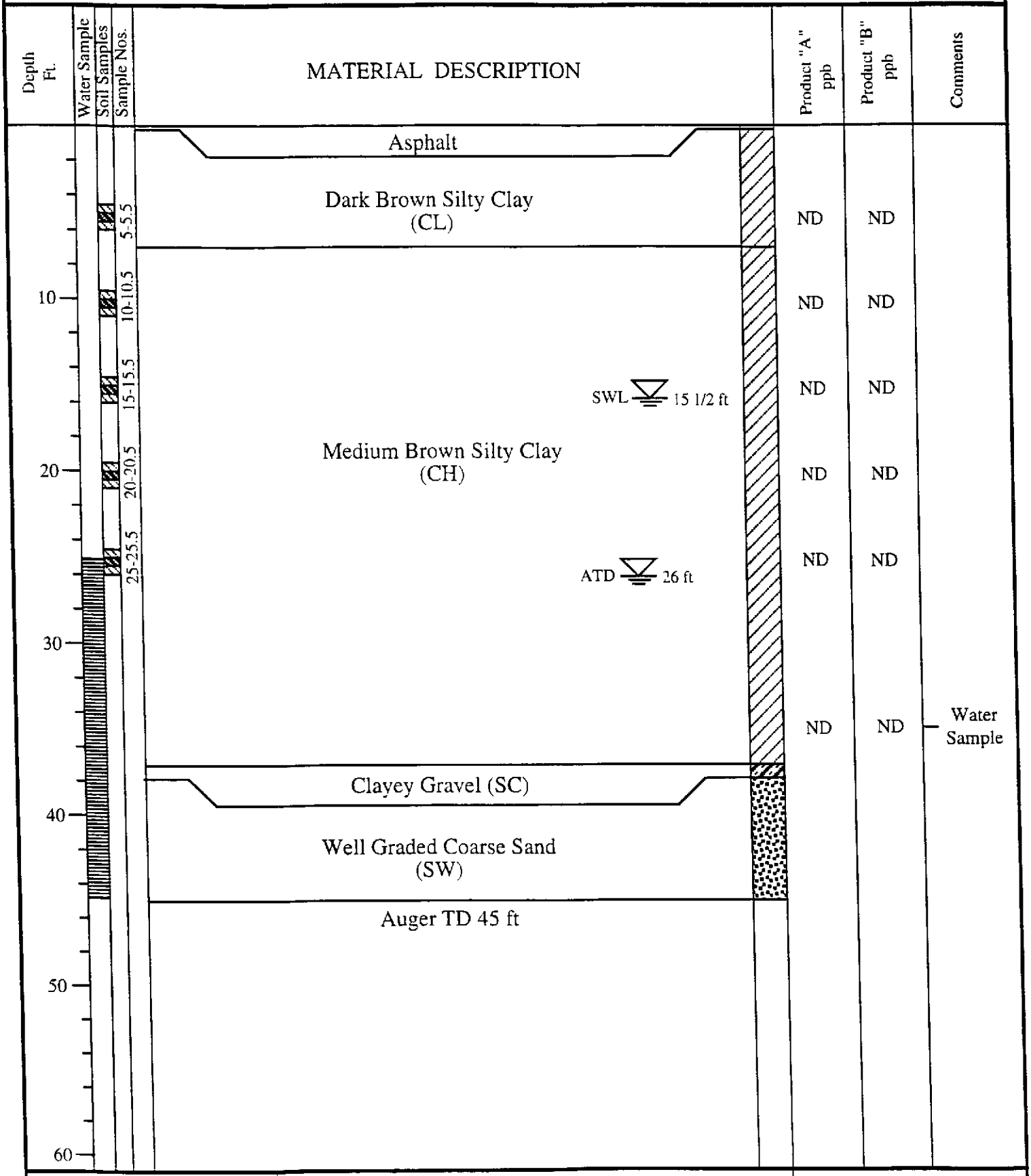


Project: EXAMPLE	Van Brunt & Associates	Figure 00

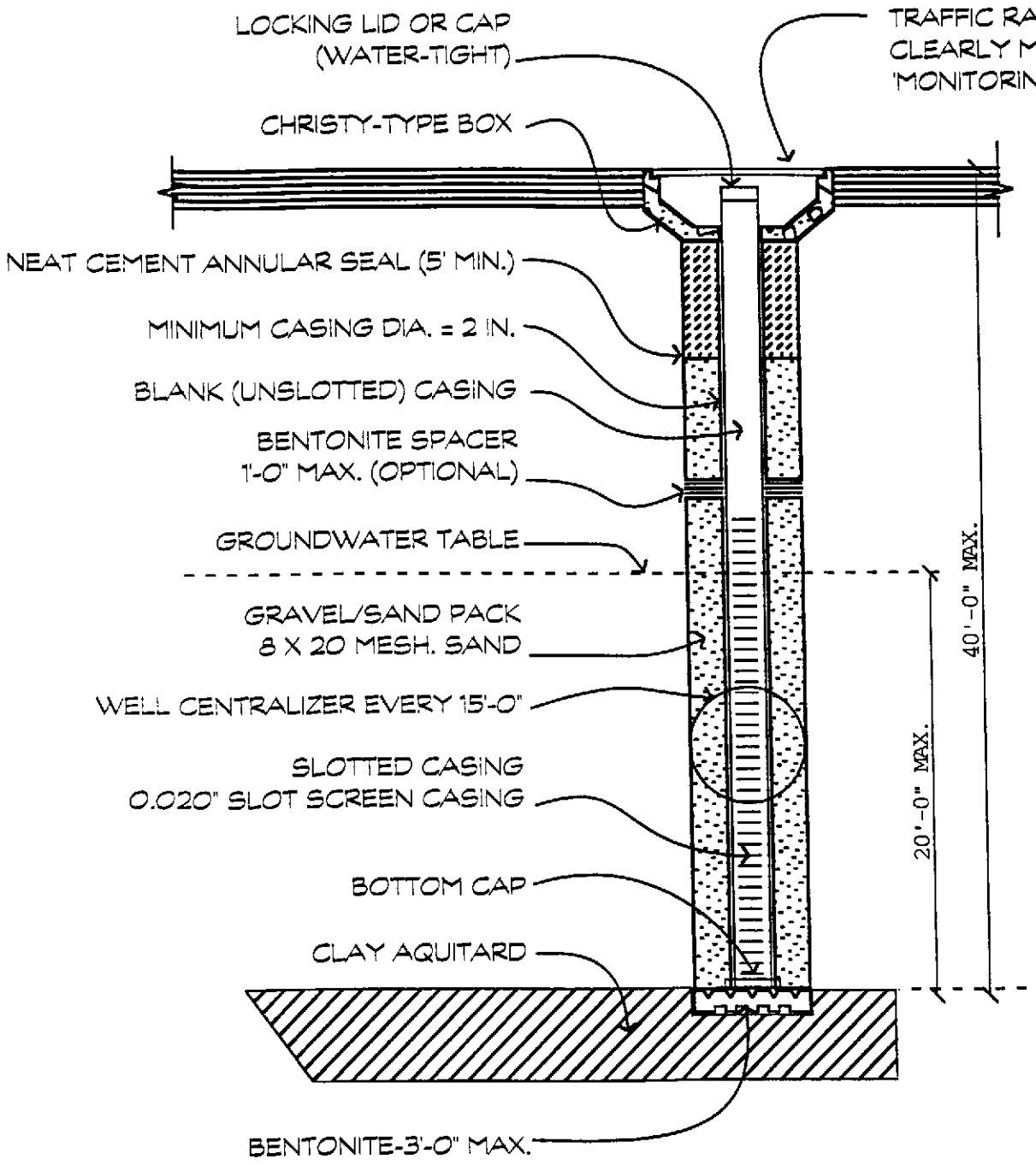
Project: EXAMPLE MW BORING LOG	Log of Monitoring Well MW-3

Drilled and constructed by: Soils Exploration Services, Benicia, CA
Proj. Geologiest : Steve Clark Started 2/11/94
Completion Date: February 11, 1994

Zone 7 Water Agency
Permit No. 94101
Reviewed by: Glen Romig P.E.



Project: EXAMPLE	Van Brunt & Associates	Figure 00



NOTE: ALL MONITORING WELLS WILL BE DRILLED USING CONVENTIONAL AUGER TECHNIQUES WITH A FIELD GEOLOGIST LOGGING SOIL TYPES

2 -

2" MONITORING WELL CONSTRUCTION DETAIL

NOT TO SCALE

8. PROPOSED LAB ANALYSIS

8.1 Laboratory Tests For Soil

All samples will be transferred to a State of California Department of Health Services certified laboratory for analysis. A formal chain-of-custody form will accompany the shipment. Soil samples will be analyzed by EPA Method 8010.

Soil

Any soil materials removed from the sewer line excavation and surrounding area will be classified and initially segregated into four stockpiles as "heavily contaminated", "contaminated", "potentially contaminated" or "uncontaminated", based on results from OVA measurements and visual observations.

The segregated material will be moved to a staging area, adjacent to the excavation, where material will again be sampled with an OVA to confirm its initial classification. All soil stockpiles will be laid onto 10 mil plastic sheeting and subsequently covered to prevent uncontrolled loss of VOC's to the air. Soil will be segregated as indicated in the following table:

Soil Segregation Table

OVA Reading (ppm) VOCs	Designation	Treatment
0	Uncontaminated	None
1-100	Potentially Contaminated	Cover with Plastic Barrier
100-1000	Contaminated	Cover with Plastic Barrier
>1000	Heavily Contaminated	Place into and Seal DOT Approved Drums/Container

8.2 Laboratory Tests For Groundwater

All samples will be transferred to a State of California Department of Health Services certified laboratory for analysis. A formal chain-of-custody form will accompany the shipment. Soil samples will be analyzed by EPA Method 8010.

8.3 Laboratory Results For Waste Characterization

The soil OVA screening will be confirmed by approved lab analysis of representative samples of the segregated soil.

9. TREATMENT OF LIQUID AND SOIL WASTE

9.1 Liquid Waste

Monitoring well purge water will be stored onsite in approved containers prior to characterization. Water wastes derived during standard detergent contamination processes will be stored in approved containers prior to characterization. Characterization of all liquid wastes will be performed by analytical methods and disposal will be documented.

9.2 Soil Waste

Soil wastes will be created from traditional auger flight drilling techniques and from excavating the sewer line, and perhaps other foundation areas beneath Building 4. Soil cuttings will be placed directly into approved 55 gallon DOT containers. Soil from excavations will be screened using an OVA as previously described and placed on 10-mil plastic and covered. Soil recycling or landfill options will be considered for this site.

10. OTHER CONSIDERATIONS

10.1 Site Security

The property will be vacant and should not pose a problem with field operations. During drilling operations, work areas will be established using caution tape and control barriers to afford security. All pits and excavations will be fenced.

10.2 Organic Vapor Sampling

During drilling, measurements will be made of the air and soil. Air samples will be measured for health and safety purposes as described in the Health & Safety Plan. Soil boring samples will be measured for total ionizable vapors using an Organic Vapor Analyzer (OVA). This will be done to characterize the presence and the level of contamination. Soil samples will be collected for OVA screening in approximately five foot increments as the auger flights are driven into the ground. OVA soil readings will be taken at a distance of not greater than three inches from freshly drilled soil samples. The OVA will be calibrated daily using the appropriate zero gas and/or hexane following the manufacturer's recommendations.

10.3 Equipment Decontamination

All equipment will be decontaminated prior to use and between each borehole or well location. Auger flights will be steam cleaned. The split spoon sampler, sampling sleeves, well development equipment and bailers will be washed in Alcanox and subsequently rinsed with clean water using sequential field rinsing techniques.

10.4 Permits

Necessary permits will be retrieved as needed from the authorities having jurisdiction, including the Alameda County Water and Flood Control Agency.

11. FIGURES/PLANS

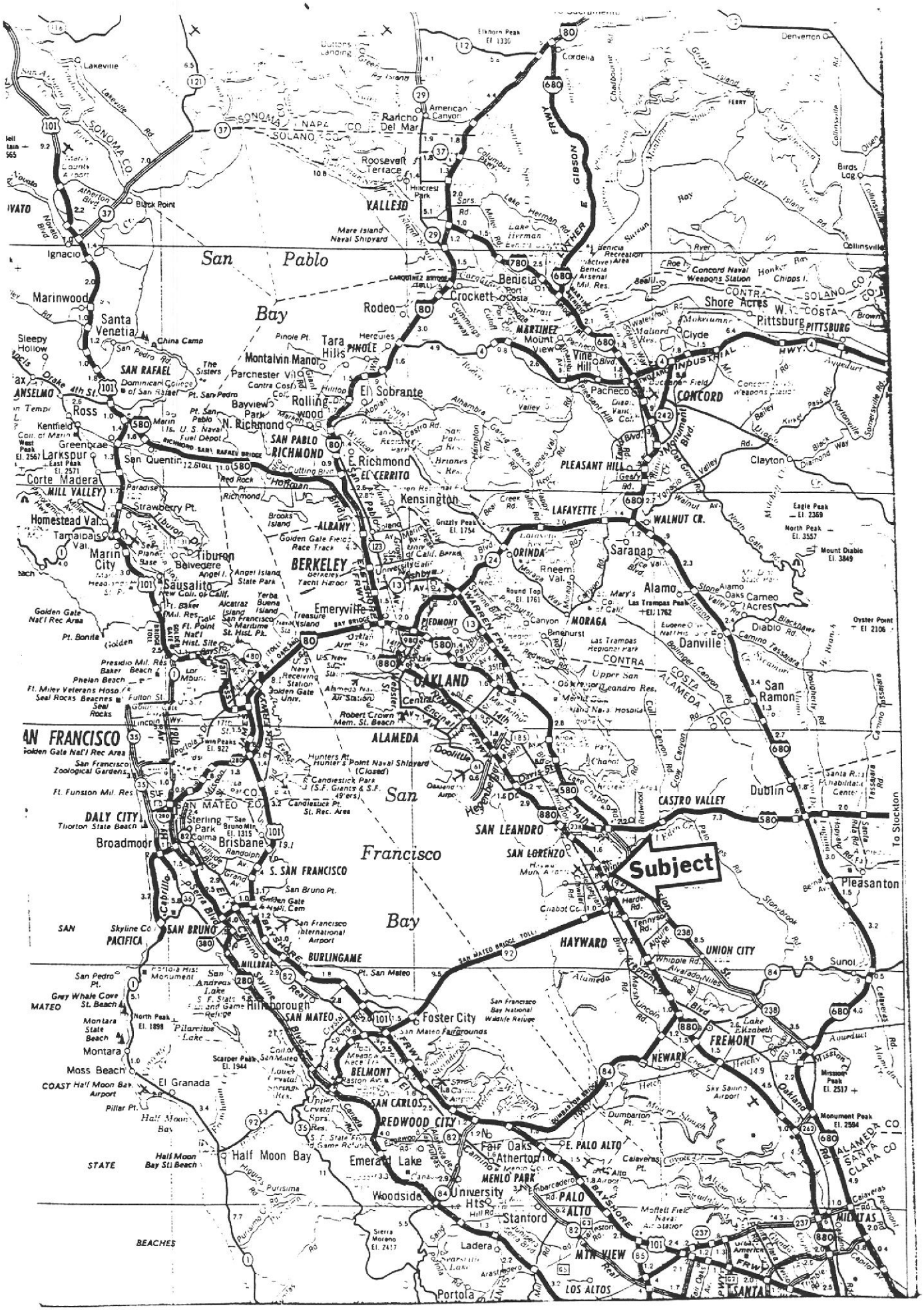
Figure 1 **Regional Location Map**

Figure 2 **Local Vicinity Map**

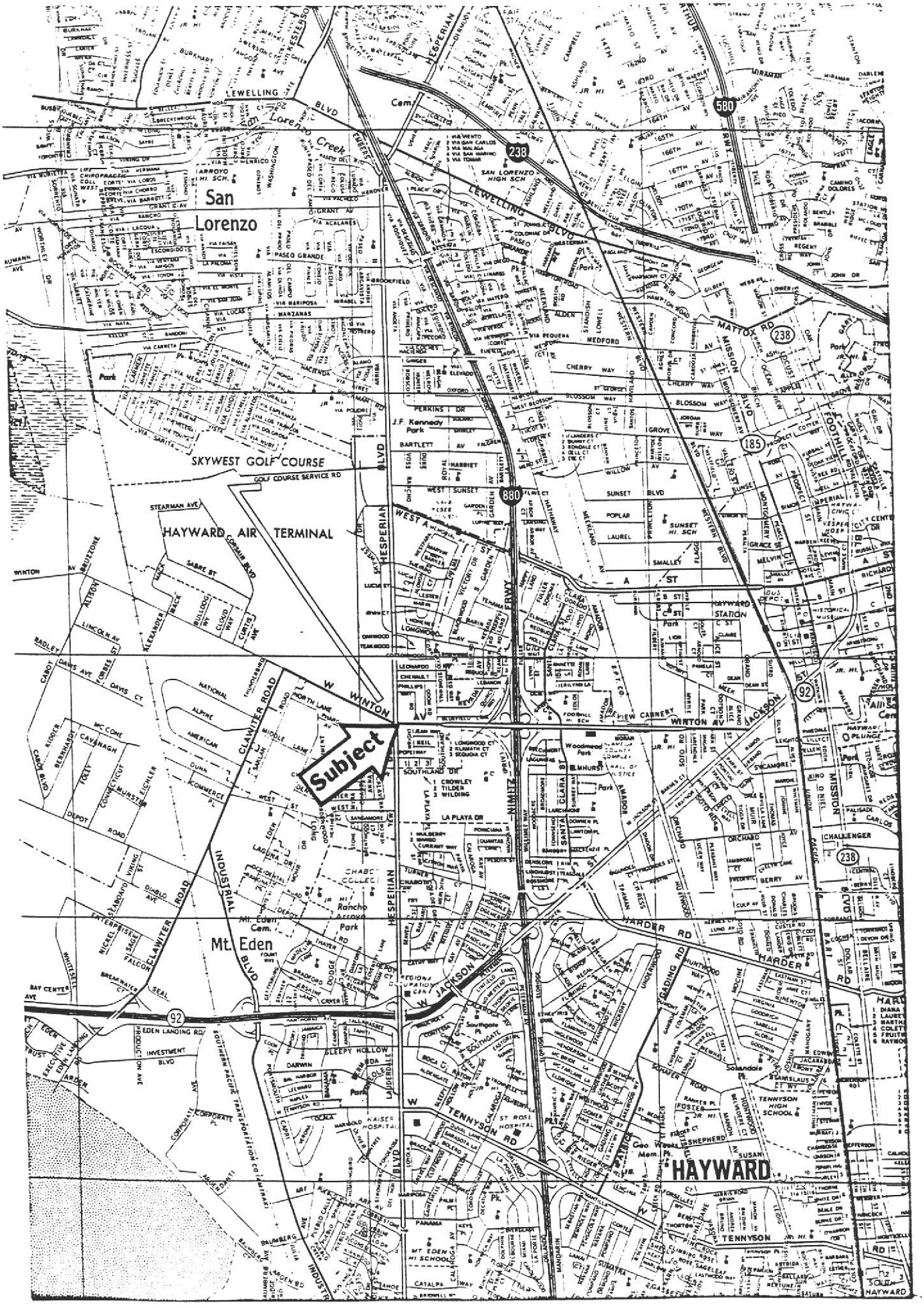
Sheet A1 **Site Plan**

Sheet A2 **Existing Monitoring Well Locations and Analytical Data**

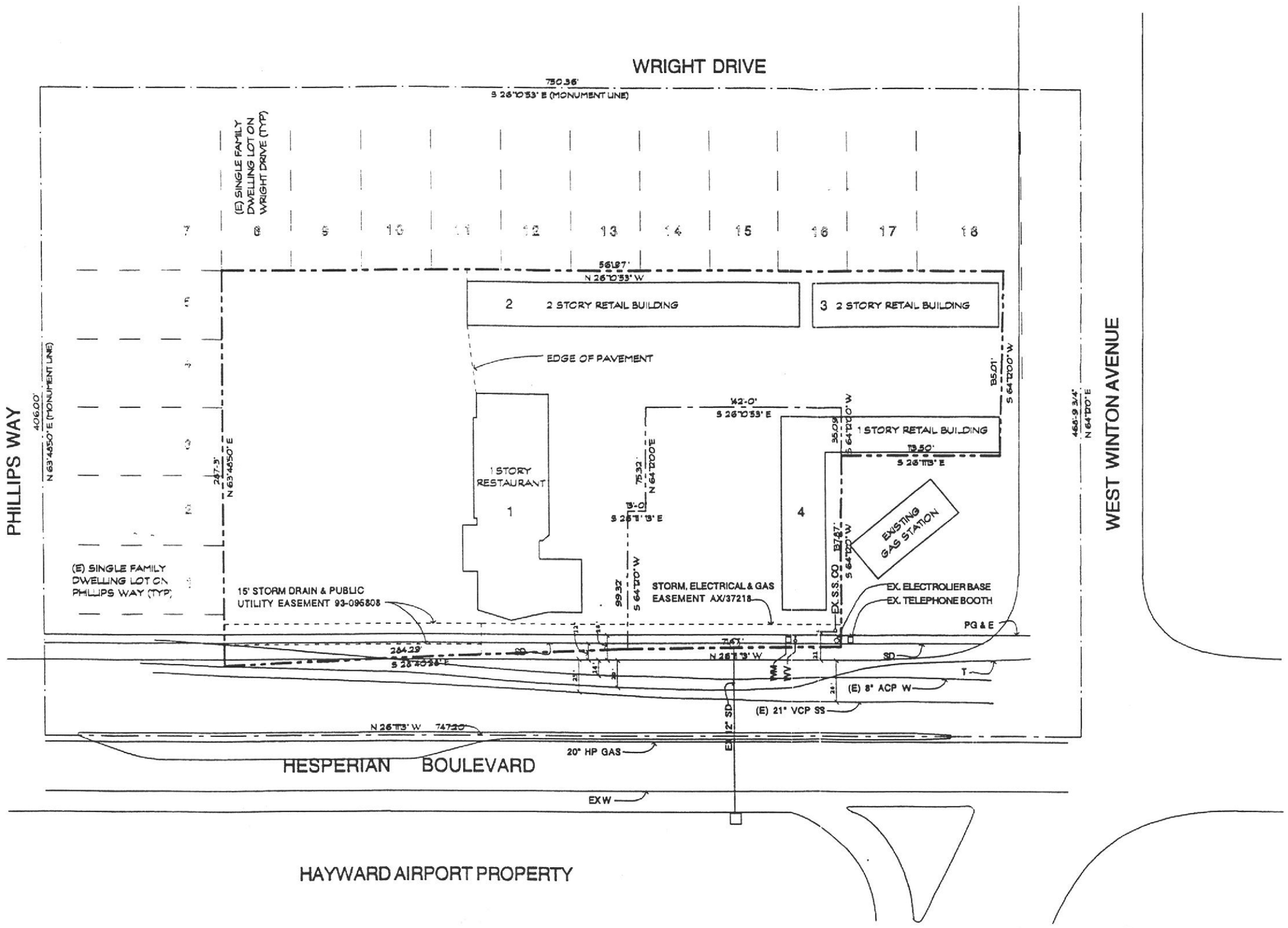
Sheet A3 **Proposed Monitoring Wells, Soils Borings and Groundwater Grab Samples**



REGIONAL LOCATION MAP



LOCAL VICINITY MAP



1 SITE PLAN - EXISTING SITE UTILITIES
1"= 40'-0"

GROUND WATER GRADIENT ARROW

SYMBOL LEGEND

- (A) — VBA GRID COORDINATES FOR THE IDENTIFICATION OF SOIL / GROUND WATER SAMPLING LOCATIONS. A NEGATIVE NUMBER REPRESENTS UP OR CROSS GRADIENT.
- MW-3 — EXISTING GROUND WATER MONITORING WELL
- OBSERVATION WELL
- PROPOSED MONITORING WELL W/ SOIL SAMPLES AT 5' INTERVALS AND LITHOLOGIC LOG. NOTE: LITHOLOGY WILL BE IDENTIFIED
- SOIL SAMPLES AT 5' INTERVALS.
- GROUND WATER GRAB SAMPLE

SHEET INDEX

OWNER: ADOLPH P. SCHUMAN MARITAL TRUST
JIM CRAFTS ESQ. CO-TRUSTEE

AIRPORT PLAZA SHOPPING CENTER
23958 HESPERIAN BLVD. HAYWARD CA.

VAN BRUNT ASSOCIATES

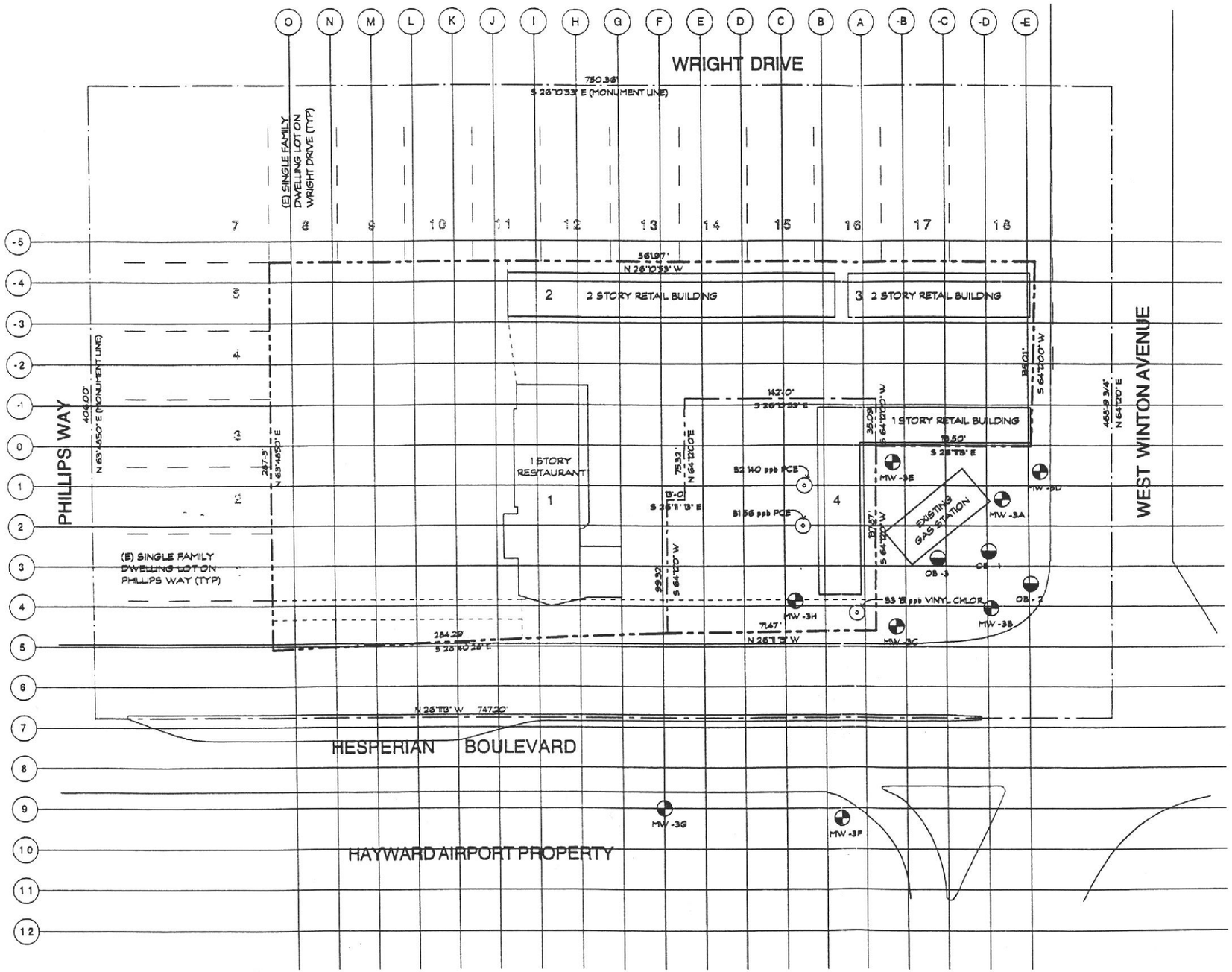
WALNUT CREEK CALIFORNIA (510) 685-5900

TITLE SHEET

JOB #: 94502

JULY 8, 1996

A1



1 SITE PLAN - EXISTING GROUND WATER MONITORING WELLS AND LAB RESULTS

1"= 40'-0"

MW - 3A	3/93	6/93			3/95
ANALYSIS METH.	601	601			8240
TRANS- 1,2 DCE	<1.0 PPb	<1.0 PPb			ND
TETRA-CHLOR.	<1.0 PPb	<1.0 PPb			ND
TRI-CHLOR.	<1.0 PPb	<1.0 PPb			ND
VINYL CHLOR.	<1.0 PPb	<1.0 PPb			ND
CIS- 1,2 DCE	ND	ND			ND

MW - 3B					3/95
ANALYSIS METH.					8240
TRANS- 1,2 DCE					ND
TETRA-CHLOR.					ND
TRI-CHLOR.					ND
VINYL CHLOR.					ND
CIS- 1,2 DCE					ND

MW - 3C					3/95
ANALYSIS METH.					8240
TRANS- 1,2 DCE					ND
TETRA-CHLOR.					ND
TRI-CHLOR.					ND
VINYL CHLOR.					ND
CIS- 1,2 DCE					ND

MW - 3D		3/93	6/93		3/95
ANALYSIS METH.		601	601		8240
TRANS- 1,2 DCE		<1.0 PPb	<1.0 PPb		ND
TETRA-CHLOR.		<1.0 PPb	<1.0 PPb		ND
TRI-CHLOR.		<1.0 PPb	<1.0 PPb		ND
VINYL CHLOR.		<1.0 PPb	<1.0 PPb		ND
CIS- 1,2 DCE		ND	ND		ND

MW - 3E		3/93	6/93		3/95
ANALYSIS METH.		601	NOT SAMPLED: WELL IN-ACCESS-IBLE		8240
TRANS- 1,2 DCE		<1.0 PPb			ND
TETRA-CHLOR.		<1.0 PPb			14 PPb
TRI-CHLOR.		<1.0 PPb			ND
VINYL CHLOR.		<1.0 PPb			ND
CIS- 1,2 DCE		ND			ND

MW - 3F	9/92	3/93	3/93	6/93	3/95
ANALYSIS METH.	8240	601	8240	8240	8240
TRANS- 1,2 DCE	<1.0 PPb	<1.0 PPb	<5.0 PPb	<5.0 PPb	ND
TETRA-CHLOR.	5.1 PPb	2.3 PPb	<5.0 PPb	5.8 PPb	42 PPb
TRI-CHLOR.	2.2 PPb	2.6 PPb	<5.0 PPb	3.6 PPb	29 PPb
VINYL CHLOR.	36 PPb	230 PPb	220 PPb	220 PPb	92 PPb
CIS- 1,2 DCE	<1.0 PPb	ND	<5.0 PPb	14 PPb	65 PPb

MW - 3G		3/93	3/93	6/93	3/95
ANALYSIS METH.		601	8240	8240	8240
TRANS- 1,2 DCE		12 PPb	<5.0 PPb	<5.0 PPb	ND
TETRA-CHLOR.		110 PPb	150 PPb	200 PPb	150 PPb
TRI-CHLOR.		16 PPb	16 PPb	23 PPb	11 PPb
VINYL CHLOR.		<1.0 PPb	<10 PPb	<5.0 PPb	ND
CIS- 1,2 DCE		ND	14 PPb	20 PPb	6 PPb

MW - 3H	9/92	3/93	3/93	6/93	3/95
ANALYSIS METH.	8240	601	8240	8240	8240
TRANS- 1,2 DCE	<1.0 PPb	29 PPb	<5.0 PPb	<5.0 PPb	ND
TETRA-CHLOR.	580 PPb	110 PPb	170 PPb	220 PPb	59 PPb
TRI-CHLOR.	120 PPb	40 PPb	59 PPb	72 PPb	ND
VINYL CHLOR.	<2.0 PPb	<1.0 PPb	<10 PPb	<5.0 PPb	ND
CIS- 1,2 DCE	140 PPb	ND	34 PPb	56 PPb	ND

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VAN BRUNT ASSOCIATES

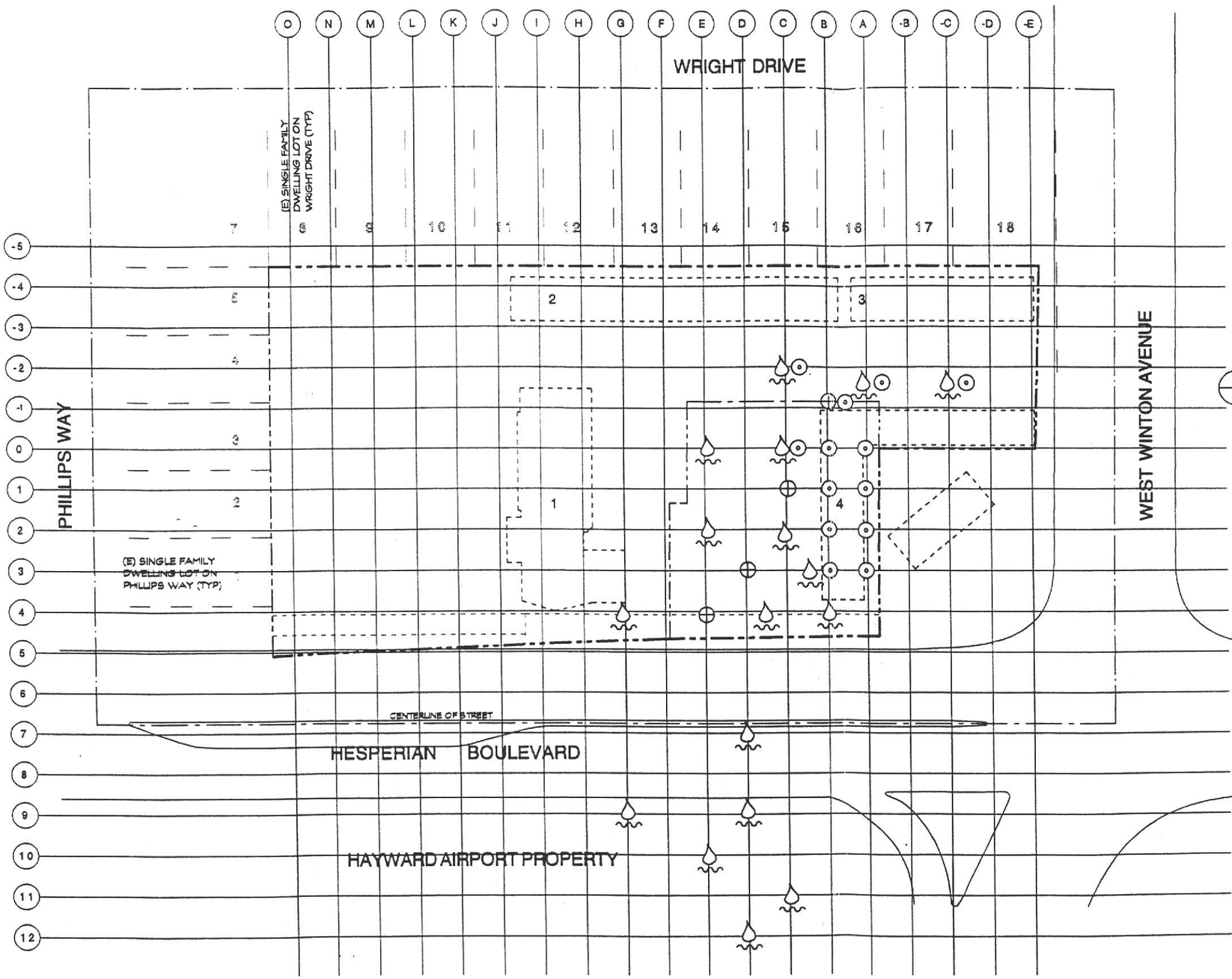
WALNUT CREEK CALIFORNIA (510) 685-5900

EXISTING GND. WATER MONITORING WELLS

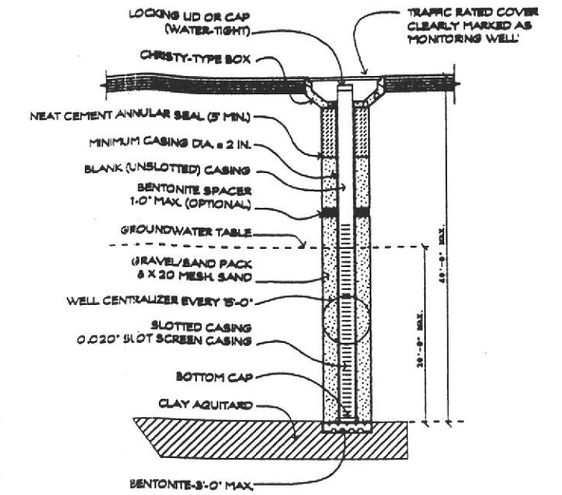
JOB #: 94502

JULY 5, 1995

A2



1 SITE PLAN - PROPOSED MONITORING WELLS, SOIL BORINGS AND GROUND WATER SAMPLES
1"= 40'-0"



NOTE: ALL MONITORING WELLS WILL BE DRILLED USING CONVENTIONAL AUGER TECHNIQUES WITH A FIELD GEOLOGIST LOGGING SOIL TYPES

2 2" MONITORING WELL CONSTRUCTION DETAIL
NOT TO SCALE

OWNER: ADOLPH P. SCHUMAN MARITAL TRUST
JIM CRAFTS ESQ. CO-TRUSTEE

AIRPORT PLAZA SHOPPING CENTER
23958 HESPERIAN BLVD. HAYWARD CA.

VAN BRUNT ASSOCIATES
WALNUT CREEK CALIFORNIA (510) 685-5900

SITE PLAN

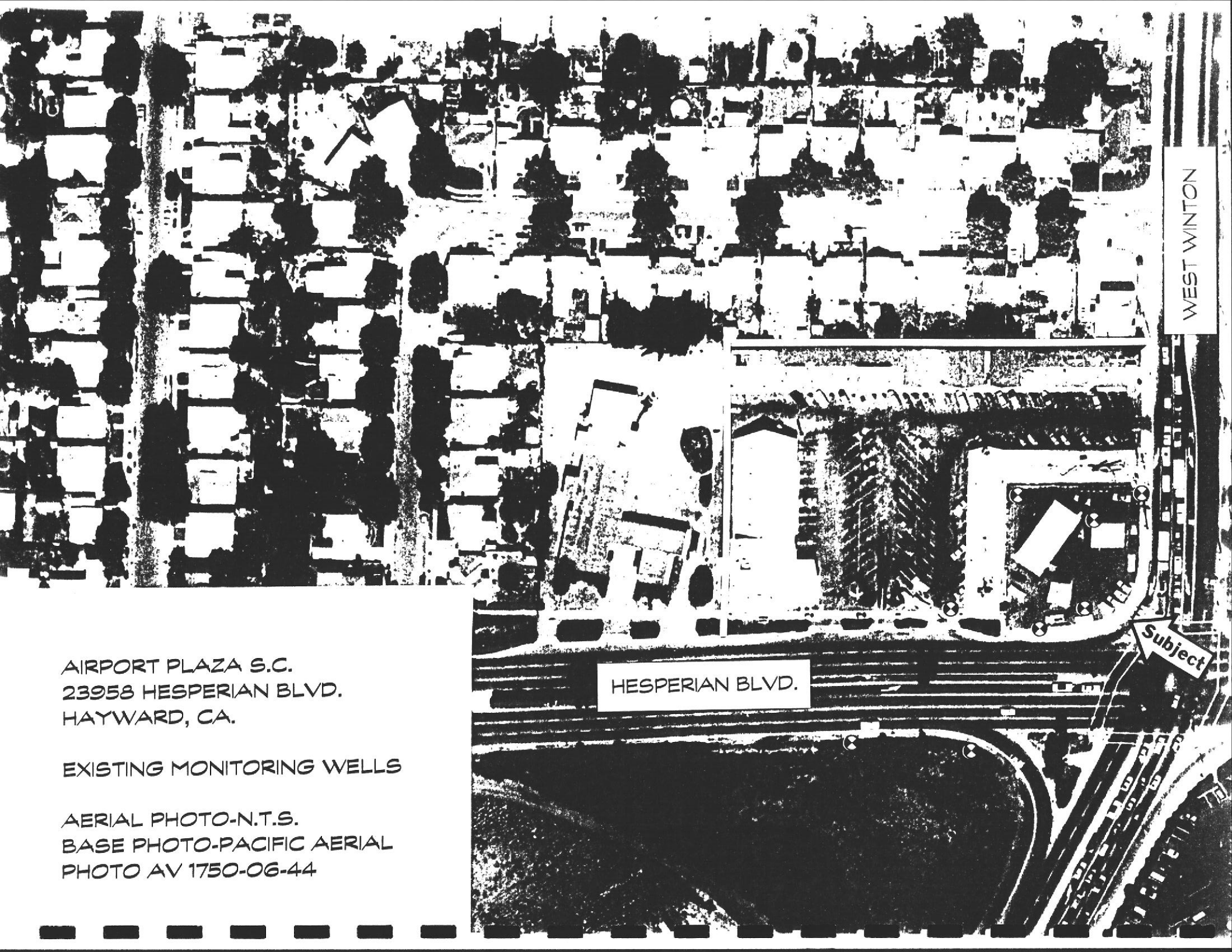
JOB #: 94502

JULY 5, 1995

A3

12. PHOTOGRAPHS

12.1 Aerial Photo



AIRPORT PLAZA S.C.
23958 HESPERIAN BLVD.
HAYWARD, CA.

EXISTING MONITORING WELLS

AERIAL PHOTO-N.T.S.
BASE PHOTO-PACIFIC AERIAL
PHOTO AV 1750-06-44

13. REFERENCES

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23958 HESPERIAN BOULEVARD, HAYWARD, CA

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Quarterly Technical Report, Second Quarter of 1990 (August 30, 1990)

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Excerpt from Report (December 18, 1990)

CEECON
Letter Report Vapor Extraction Test (July 29, 1993)

RESNA
Fourth Quarter 1993 Quarterly Report (December 29, 1993)

TERRA VAC
Dual Vacuum Extraction Remediation
Letter Work Plan (December 14, 1993)
Letter Modification to Work Plan (January 21, 1994)
Drilling Report (February 17, 1994)

TEXACO ENVIRONMENTAL SERVICES
Letter re Groundwater Monitoring & Sampling (June 10, 1994)
Letter re. Groundwater Monitoring & Sampling (August 30, 1994)

14. APPENDIX

14.1 VBA Health And Safety Plan Development

Van Brunt Associates will prepare and submit, if required, our standard site specific Health and Safety Plan. Van Brunt Associates always conducts at least one initial Health and Safety briefing onsite prior to commencement of work.

14.2 Chemical Hazards of Trichloroethene

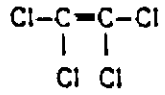
14.3 MSDS

Appendix 14.2
Chemical Hazards of Trichloroethylene

Chemical name, Structure/formula CAS and RTECS Nos., and DOT ID and Guide Nos.	Trichloroethylene $ClCH = CCl_2$ 79-01-6 KX4550000 1710 74
Synonyms, Trade names Conversion factors	Ethylene trichloride Triclene Trichloroethene 1ppm = 5.46 mg/m^3
Exposure limits (TWA unless noted otherwise	NIOSH Ca 25 ppm OSHA 50 ppm (270 mg/m^3) ST 200 ppm (1080 mg/m^3)
IDLH	Ca (1000 ppm)
Physical description	Colorless liquid (unless dyed blue) with a chloroform-like odor
Chemical and physical properties: MW BP SOL FI, P IP, Sp.Gr Flammability VP FRZ UEL LEL	 MW: 131.4 BP: 189°F SOL (77°F): 0.1% FI, P: 90°F IP: 9.45 eV SP.Gr: 1.46 Class 1C Flammable liquid, but burns with difficulty VP: 58 mm FRZ: 99°F UEL (77°F): 10.5% LEL (77°F): 8%
Incompatibilities and reactivities	Strong caustics & alkalis; chemically active metals such as barium, lithium, sodium, magnesium, titanium & beryllium
Measurement method	Char; CS_2; GC/FID; 111, (#1022)
Personal protection and sanitation	Clothing: Repeat Goggles: Reason prob Wash: Prompt wet Change: N.R. Remove: Prompt non-imperv wet

Appendix 14.2
Chemical Hazards of Trichloroethylene

Recommendations for respirator selection - maximum concentration for use (MUC)	NIOSH ¥: SCBAF:PD,PP/SAF;PD,PP:ASCBA Escape: GMFOV/SCBAE
Health Hazards:	
Route/Symptoms	Inh Head, verti; vis dist Ing Tremors, som, nau Con Vomit; ittit eyes; derm; card arrhy, pares; (carc)
First Aid	Eye: Irr immed Skin: Soap wash prompt Breath: Resp support Swallow: Medical attention immed
Target Organs	Resp sys. heart, liver, kidneys, CNS, skin

COMMON SYNONYMS:	CAS REG.NO.: 127-18-14 NIOSH NO: KX3850000 FORMULA: C_2Cl_4 STRUCTURE: 	AIR W/V CONVERSION FACTOR at 25°C (12) 6.78 mg/m³ ≈ 1 ppm; 0.147 ppm ≈ 1 mg/m³ MOLECULAR WEIGHT: 165.85
Carbon dichloride Ethylene tetrachloride PCE PERC Perchloroethylene Tetrachloroethene Tetrachloroethylene		

REACTIVITY	Reactions of halogenated organic materials such as tetrachloroethylene with cyanides, mercaptans or other organic sulfides typically generate heat, while those with amines, azo compounds, hydrazines, caustics or nitrides commonly evolve heat and toxic or flammable gases. Reactions with oxidizing mineral acids may generate heat, toxic gases and fires. Those with alkali or alkaline earth metals, certain other chemically active elemental metals like aluminum, zinc or magnesium, organic peroxides or hydroperoxides, strong oxidizing agents, or strong reducing agents typically result in heat generation and explosions and/or fires (511).

PHYSICO-CHEMICAL DATA	• Physical State: Liquid (at 20°C)	(23)
	• Color: Colorless	(23)
	• Odor: Ether-like	
	• Odor Threshold: 50.000 ppm	(38)
	• Density: 1.6250 g/mL (at 20°C)	(23)
	• Freeze/Melt Point: -22.40°C	(23)
	• Boiling Point: 121.00°C	(23)
	• Flash Point: None	
	• Flammable Limits: Nonflammable	

PHYSICO-CHEMICAL DATA (Cont.)	• Autoignition Temp.: Nonflammable	
	• Vapor Pressure: 1.40E+01 mm Hg (at 20°C)	(38)
	• Satd. Conc. in Air: 1.2600E+05 mg/m^3 (at 20°C)	(67)
	• Solubility in Water: 1.50E+02 mg/L (at 20°C)	(38)
	• Viscosity: 0.890 (estimate)(at 20°C)	(21)
	• Surface Tension: 3.1300E+01 dyne/cm (at 20°C)	(59)
	• Log (Octanol-Water Partition Coeff.): 3.14	(29)
	• Soil Adsorp. Coeff.: 6.65E+02	(652)
	• Henry's Law Const.: 2.27E-02 $atm \cdot m^3/mol$ (at 20°C)	(74)
	• Bioconc. Factor: 4.90E+01 (bluegill) 6.60E+01 (estim)	(170,659)

PERSISTENCE IN THE SOIL-WATER SYSTEM	Relatively mobile in soil-water systems, including transport of vapor through air-filled pores as well as transport in solution. Chemical is resistant to hydrolysis and to biodegradation (except by acclimated mixed cultures); it may thus persist for months to years (or longer).

PATHWAYS OF EXPOSURE	The primary pathway of concern from a soil-water system is the migration of tetrachloroethylene to groundwater used as sources for drinking water. There is substantial evidence that such migration has occurred in the past. Inhalation resulting from volatilization from surface soils and drinking water may also be important.

HEALTH HAZARD DATA	Signs and Symptoms of Short-term Human Exposure: (45) Ingestion and inhalation cause nausea, vomiting, headache, dizziness, drowsiness and tremors. Skin contact with liquid causes irritation and blistering. Both liquid and vapor are irritating to the eyes. Acute Toxicity Studies: (3504) INHALATION: LC_{50} 5200 ppm · 4 hr — Mouse LC_{50} 5040 ppm · 8 hour — Rat ORAL: LD_{50} 8850 mg/kg — Rat LD_{50} 8100 mg/kg — Mouse SKIN: LD_{50} 64680 mg/kg · 10-day — Mouse Long-Term Effects: Liver and kidney toxicity Pregnancy/Neonate Data: Negative Genotoxicity Data: Negative Carcinogenicity Classification: IARC - Group 2B (possibly carcinogenic to humans) NTP - Clear evidence in mice, male rats; some evidence in female rats EPA - Group B2 (sufficient evidence in animals and inadequate evidence in humans)
HANDLING PRECAUTIONS (38)	Handle chemical only with adequate ventilation. • Vapor concentrations of 100-500 ppm: any supplied-air respirator or self-contained breathing apparatus with full facepiece; gas mask with organic vapor canister; chemical cartridge respirator with full facepiece and organic vapor cartridge. • Above 500 ppm: self-contained breathing apparatus with full facepiece operated in positive-pressure mode. • Chemical goggles if there is probability of eye contact. • Butyl, natural rubber, neoprene or PVC gloves/apron/boots to prevent repeated or prolonged skin contact with the liquid.

ENVIRONMENTAL AND OCCUPATIONAL STANDARDS AND CRITERIA

AIR EXPOSURE LIMITS:

Standards
- OSHA TWA (8-hr): 25 ppm;
- AFOSH PEL (8-hr TWA): 25 ppm; STEL (15-min): 37.5 ppm

Criteria
- NIOSH IDLH (30 min): deleted: NIOSH has recommended that the substance be treated as a potential human carcinogen.
- NIOSH REL: Lowest feasible limit
- ACGIH TLV® (8-hr TWA): 50 ppm
- ACGIH STEL (15 min): 200 ppm

WATER EXPOSURE LIMITS:

Drinking Water Standards (3742)
MCLG: 0 µg/L (proposed)
MCL : 5 µg/L (proposed)

EPA Health Advisories and Cancer Risk Levels (3977)
The EPA has developed the following Health Advisories which provide specific advice on the levels of contaminants in drinking water at which adverse health effects would not be anticipated.

- 1-day (child): 2 mg/L
- 10-day (child): 2 mg/L
- longer-term (child): 1 mg/L
- longer-term (adult): 5 mg/L
- 1E-04 cancer risk: 70 µg/L

ENVIRONMENTAL AND OCCUPATIONAL STANDARDS AND CRITERIA (Cont.)

WHO Drinking Water Guideline (666)

A tentative health-based guideline for drinking water of 10 µg/L has been proposed for tetrachloroethylene. A daily per capita consumption of two liters was assumed.

EPA Ambient Water Quality Criteria

- Human Health (355)
  - Based on ingestion of contaminated water and aquatic organisms (1E-05, 1E-06, 1E-07 cancer risk), 8 µg/L, 0.8 µg/L, 0.08 µg/L.
  - Based on ingestion of drinking water only, (1E-04, 1E-05, 1E-06 cancer risk), 70 µg/L, 7 µg/L, 0.7 µg/L.

- Aquatic Life (355)
  - Freshwater species
    acute toxicity:
    no criterion, but lowest effect level occurs at 5280 µg/L.

    chronic toxicity:
    no criterion, but lowest effect level occurs at 840 µg/L.

  - Saltwater species
    acute toxicity:
    no criterion, but lowest effect level occurs at 10,200 µg/L.

    chronic toxicity:
    no criterion, but lowest effect level occurs at 450 µg/L.

REFERENCE DOSES:

ORAL: 1.000E+01 µg/kg/day (3744)

REGULATORY STATUS (as of 01-MAR-89)

Promulgated Regulations

- Federal Programs

Clean Water Act (CWA)

Tetrachloroethylene is listed as a toxic pollutant, subject to general pretreatment regulations for new and existing sources, and effluent standards and guidelines (351, 3763). Effluent limitations have been set for tetrachloroethylene effluent in the following point source categories: electroplating (3767), organic chemicals, plastics, and synthetic fibers (3777), steam electric power generating (3802), metal finishing (3768), iron and steel manufacturing (354), and metal molding and casting (892). Limitations vary depending on the type of plant and industry.

Safe Drinking Water Act (SDWA)

Tetrachloroethylene is on the list of 83 contaminants required to be regulated under the SDWA of 1974 as amended in 1986 (3781). It is listed as an unregulated contaminant requiring monitoring in all community water systems and non-community non-transient water systems (3771). In states with an approved Underground Injection Control program, a permit is required for the injection of tetrachloroethylene-containing wastes designated as hazardous under RCRA (295).

Resource Conservation and Recovery Act (RCRA)

Tetrachloroethylene is identified as a toxic hazardous waste (U210) and a hazardous waste constituent (3783,3784). Non-specific sources of tetrachloroethylene-containing waste are solvent use (or recovery) activities, chlorinated aliphatic hydrocarbon production, and spent solvent mixtures containing 10% or more tetrachloroethylene (325). Waste streams from the following industries contain tetrachloroethylene and are listed as specific sources of hazardous waste: organic chemicals (production of carbon tetrachloride, 1,2-dichloroethane, vinyl chloride, and toluene diisocyanate) and inorganic chemicals (chlorine production) (3774, 3765). Effective July 8, 1987, the land disposal of hazardous wastes which contain halogenated organic compounds in total concentrations greater than or equal to 1000 mg/kg is prohibited. Effective August 8, 1988, the underground injection into deep wells of these wastes is prohibited. Certain variances exist until May, 1990 for land and injection well disposal of some wastewaters and non-wastewaters for which Best Demonstrated Available Technology (BDAT) treatment standards have not been promulgated by EPA (3786). Tetrachloroethylene is included on EPA's ground-water monitoring list. EPA requires that all hazardous waste treatment, storage, and disposal facilities monitor their ground-water for chemicals on this list when suspected contamination is first detected and annually thereafter (3775).

Toxic Substances Control Act (TSCA)
Manufacturers, processors, or importers who possess health and safety studies on tetrachloroethylene must submit them to EPA (3789).

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
Tetrachloroethylene is designated a hazardous substance under CERCLA. It has a reportable quantity (RQ) limit of 0.454 kg. Reportable quantities have also been issued for RCRA hazardous waste streams containing tetrachloroethylene but these depend upon the concentration of the chemicals in the waste stream (3766). Under SARA Title III Section 313, manufacturers, processors, importers, and users of tetrachloroethylene must report annually to EPA and state officials their releases of this chemical to the environment (3787).

Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
Tetrachloroethylene is exempt from a tolerance requirement when used as a solvent or cosolvent at a level of no more than 0.6% in pesticide formulations applied to growing crops or to raw agricultural commodities after harvest. Exemptions also apply when it is used as a solvent in pesticide formulations applied to animals (315).

Marine Protection Research and Sanctuaries Act (MPRSA)
Ocean dumping of organohalogen compounds as well as the dumping of known or suspected carcinogens, mutagens or teratogens is prohibited except when they are present as trace contaminants. Permit applicants are exempt from these regulations if they can demonstrate that such chemical constituents are non-toxic and non-bioaccumulative in the marine environment or are rapidly rendered harmless by physical, chemical or biological processes in the sea (309).

Occupational Safety and Health Act (OSHA)
Employee exposure to tetrachloroethylene shall not exceed an 8-hour time-weighted average (TWA) of 25 ppm (3539).

Clean Air Act (CAA)
EPA lists tetrachloroethylene as a hazardous air pollutant for which it will establish national emission standards under Section 112 of the Clean Air Act (3803).

Hazardous Materials Transportation Act (HMTA)
The Department of Transportation has designated tetrachloroethylene as a hazardous material with a reportable quantity of 0.454 kg, subject to requirements for packaging, labeling and transportation (3180).

Food, Drug and Cosmetic Act (FDCA)
Tetrachloroethylene is approved for use as an indirect food additive as a component of adhesives (3209).

- State Water Programs

ALL STATES
All states have adopted EPA Ambient Water Quality Criteria and NPDWRs (see Water Exposure Limits section) as their promulgated state regulations, either by narrative reference or by relisting the specific numeric criteria. These states have promulgated additonal or more stringent criteria:

CALIFORNIA
California has an action level of 4 μg/L for drinking water (3098).

CONNECTICUT
Connecticut has a quantification limit of 2 μg/L and an action level of 20 μg/L for drinking water (3137,3138).

FLORIDA
Florida has set an MCL of 3 μg/L for drinking water (3219).

KANSAS
Kansas has an action level of 7 μg/L for ground-water (3213).

NEW HAMPSHIRE
New Hampshire has set an enforceable Toxic Contaminant Level (TCL) for tetrachloroethylene in drinking water of 2.3 mg/L (assumes a child weighing 10 kg who drinks one liter of water per day) (3710).

NEW JERSEY
New Jersey has set an MCL of 1 μg/L (ppb) for drinking water (3497).

OKLAHOMA
Oklahoma has a water quality criterion of 1.6 μg/L for ground-water, and has set a nonenforceable Toxic Substance Goal of zero for public and private surface waters (3534).

PENNSYLVANIA
Pennsylvania has set a human health criterion (cancer risk level) of 0.7 μg/L for surface waters (3561).

RHODE ISLAND

Rhode Island has an acute freshwater quality guideline of 240 µg/L and a chronic guideline of 5.3 µg/L for the protection of aquatic life in surface waters. These guidelines are enforceable under Rhode Island state law (3590).

SOUTH DAKOTA

South Dakota requires tetrachloroethylene to be nondetectable, using designated test methods, in ground-water (3671).

VERMONT

Vermont has a preventive action limit of 0.07 µg/L and an enforcement standard of 0.70 µg/L for tetrachloroethylene in ground-water (3682).

WISCONSIN

Wisconsin has a preventive action limit of 0.1 µg/L and an enforcement standard of 1 µg/L for tetrachloroethylene in ground-water (3840).

Proposed Regulations

- Federal Programs

Safe Drinking Water Act (SDWA)

EPA has proposed a maximum contaminant level goal (MCLG) of zero and a maximum contaminant level (MCL) of 5 µg/L for tetrachloroethylene as part of the National Primary Drinking Water Regulations. This action is expected in May, 1989, with promulgation scheduled for December, 1990 (3759).

Resource Conservation and Recovery Act (RCRA)

EPA has proposed that solid wastes be listed as hazardous because they exhibit the characteristic defined as EP toxicity when the TCLP extract concentration is equal to or greater than 0.1 mg/L tetrachloroethylene. Final promulgation of this Toxicity Characteristic Rule is expected in June, 1989 (1565). EPA has proposed listing wastestreams from the following industries as specific sources of tetrachloroethylene-containing wastes: organic chemicals (1,1,1-trichloroethane production), and inorganic chemicals (2,4-D production) (3795).

- State Water Programs

MOST STATES

Most states are in the process or revising their water programs and proposing changes in their regulations which will follow EPA's changes when they become final. Contact with the state officer is advised. Changes are projected for 1989-90 (3683).

CALIFORNIA

California has proposed an MCL of 5 μg/L for drinking water (3096).

MINNESOTA

Minnesota has proposed a Recommended Allowable Limit (RAL) of 6.6 μg/L for tetrachloroethylene in drinking water (3451). Minnesota has also proposed a Sensitive Acute Limit (SAL) of 2110 μg/L for designated surface waters, and chronic criteria of 6.6 μg/L for designated ground-waters and 3.8 μg/L for designated surface waters for the protection of human health (3452).

NEW JERSEY

New Jersey has proposed a water quality criterion of 1 μg/L for class FW2 surface waters (3496).

EEC Directives

Directive on Ground-Water(538)

Direct discharge into ground-water (i.e. without percolation through the ground or subsoil) of organohalogen compounds and substances which may form such compounds in the aquatic environment, substances which possess carcinogenic, mutagenic or teratogenic properties in or via the aquatic environment, and mineral oils and hydrocarbons is prohibited. Appropriate measures deemed necessary to prevent indirect discharge into ground-water (i.e., via percolation through ground or subsoil) of these substances shall be taken by member countries.

Directive on the Quality Required of Shellfish Waters (537)

The mandatory specifications for organohalogenated substances specify that the concentration of each substance in the shellfish water or in shellfish flesh must not reach or exceed a level which has harmful effects on the shellfish and larvae. The specifications for organo-halogenated substances state that the concentration of each substance in shellfish flesh must be so limited that it contributes to the high quality of the shellfish product.

Directive Relating to the Classification, Packaging and Labeling of Dangerous Preparations (Solvents) (544)
Tetrachloroethylene is listed as a Class II/b harmful substance and is subject to packaging and labeling regulations.

Directive on the Discharge of Dangerous Substances (535)
Organohalogens, carcinogens or substances which have a deleterious effect on the taste and/or odor of human food derived from aquatic environments cannot be discharged into inland surface waters, territorial waters or internal coastal waters without prior authorization from member countries which issue emission standards. A system of zero-emission applies to discharge of these substances into ground-water.

Directive on Toxic and Dangerous Wastes (542)
Any installation, establishment, or undertaking which produces, holds and/or disposes of certain toxic and dangerous wastes including phenols and phenol compounds; organic-halogen compounds, excluding inert polymeric materials an other substances referred to in this list or covered by other Directives concerning the disposal of toxic and dangerous waste; chlorinated solvents; organic solvents; biocides and phyto-pharmaceutical substances; ethers and aromatic polycyclic compounds (with carcinogenic effects) shall keep a record of the quantity, nature, physical and chemical characteristics and origin of such waste, and of the methods and sites used for disposing of such waste.

Directive on the Classification, Packaging and Labeling of Dangerous Substances (787)
Tetrachloroethylene is classified as a harmful substance and is subject to packaging and labeling regulations. Tetrachloroethylene may contain a stablizer and if the stablizer changes the dangerous properties of this substance should be labeled in accordance with rules in Annex I.