

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

April 11, 2008

Voila Juices  
510 Derby Avenue  
Emeryville, CA 94601

Gary Boland  
3049 Halcyon Court  
Berkeley, CA 94705-1913

Barton and Shirley Bennett  
1225 Alpine Road, Suite 202  
Walnut Creek, CA 94596-4400

Subject: SLIC Case RO0002866 and Geotracker Global ID T06019786231, F&F Precision Grinding, 510 Derby Avenue, Oakland, CA 94601 – Case Closure

Dear Mr. Boland and Mr. and Ms. Bennett:

This letter confirms the completion of site investigation and remedial actions for the soil and groundwater investigation at the above referenced site. We are also transmitting the enclosed case closure summary. These documents confirm the completion of the investigation and cleanup of the reported releases at the subject site with the provision that the information provided to this agency was accurate and representative of existing conditions. The subject Spills, Leaks, Investigation, and Cleanup (SLIC) case is closed. This case closure letter and the case closure summary can also be viewed on the State Water Resources Control Board's Geotracker website (<http://geotracker.swrcb.ca.gov>) and the Alameda County Environmental Health website (<http://www.acgov.org/aceh/index.htm>).

#### SITE INVESTIGATION AND CLEANUP SUMMARY

Please be advised that the following conditions exist at the site:

- Total petroleum hydrocarbons as motor oil remain in shallow soil at concentrations up to 260 ppm.
- Total petroleum hydrocarbons as diesel remain in shallow groundwater at concentrations up to 188 ppb.

If you have any questions, please call Jerry Wickham at (510) 567-6791. Thank you.

Sincerely,



Donna L. Drogos, P.E.  
LOP and Toxics Program Manager

Gary Boland  
Barton and Shirley Bennett  
RO0002866  
April 11, 2008  
Page 2

Enclosures:

1. Case Closure Summary

cc: Cherie McCaulou (w/enc)  
SF- Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Leroy Griffin (w/enc)  
Oakland Fire Hazardous Materials Unit  
250 Frank Ogawa Plaza, Suite 3341  
Oakland, CA 94612

City of Oakland Building Services (w/enc)  
250 Frank H. Ogawa Plaza, Suite 2114  
Oakland, CA 94612

Frank Poss (w/o enc)  
Professional Service Industries, Inc.  
4703 Tidewater Avenue, Suite B  
Oakland, CA 94601

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

**CASE CLOSURE SUMMARY  
SPILLS, LEAKS, INVESTIGATION, AND CLEANUP PROGRAM**

**I. AGENCY INFORMATION**

Date: January 18, 2008

Agency Name: Alameda County Environmental Health	Address: 1131 Harbor Bay Parkway
City/State/Zip: Alameda, CA 94502-6577	Phone: (510) 567-6791
Responsible Staff Person: Jerry Wickham	Title: Senior Hazardous Materials Specialist

**II. CASE INFORMATION**

Site Facility Name: F&F Precision Grinding		
Site Facility Address: 510 Derby Avenue, Oakland, CA 94601		
RB Case No.: --	Local Case No.: --	LOP Case No.: RO0002866
URF Filing Date: 08/13/2004	Geotracker ID: T06019786231	APN: 25-667-16-2
Responsible Parties	Addresses	Phone Numbers
Gary Boland	3049 Halcyon Court #202, Berkeley, CA 94705	925-279-1775
Barton and Shirley Benett	1225 Alpine road, Suite 202, Walnut Creek, CA 94596-4400	No phone number

Tank I.D. No	Size in Gallons	Contents	Closed In Place/Removed?	Date
No USTs on site	---	---	---	---
---	---	---	---	---
---	---	---	---	---
---	---	---	---	---
Piping			---	---

**III. RELEASE AND SITE CHARACTERIZATION INFORMATION**

Cause and Type of Release: Soil borings were advanced near two sumps and two drum storage areas, which were identified as areas of concern for environmental investigation. The causes and types of releases in each area are unknown.	
Site characterization complete? Yes	Date Approved By Oversight Agency: -----

Monitoring wells installed? No	Number: ---	Proper screened interval? ---
Highest GW Depth Below Ground Surface: 8 feet below ground surface (bgs)	Lowest Depth: 12 feet bgs	Flow Direction: Presumed to southwest toward Tidal Canal
Most Sensitive Current Use: Potential drinking water source.		

Summary of Production Wells in Vicinity:	
The nearest water supply well appears to be an irrigation well located approximately 1,100 feet west of the site. The irrigation well is a 10-inch diameter well approximately 160 feet deep. Based on the distance from the site and the cross gradient location, the irrigation well is not expected to be impacted by the site. No other water supply wells were identified within 2,000 feet of the site.	
Are drinking water wells affected? No	Aquifer Name: East Bay Plain
Is surface water affected? No	Nearest SW Name: Alameda Tidal Canal is approximately 1,200 feet southwest of the site
Off-Site Beneficial Use Impacts (Addresses/Locations): No	
Reports on file? Yes	Where are reports filed? Alameda County Environmental Health and Oakland Fire Department

TREATMENT AND DISPOSAL OF AFFECTED MATERIAL			
Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Tank	---	---	---
Piping	---	---	---
Free Product	---	---	---
Soil	---	---	---
Groundwater	---	---	---

**MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS BEFORE AND AFTER CLEANUP**  
 (Please see Attachments 1 through 5 for additional information on contaminant locations and concentrations)

Contaminant	Soil (ppm)		Water (ppb)	
	Before	After	Before	After
TPH (Gas)	<10	<10	<50	<50
TPH (Diesel)	18	18	188	188
TPH (Motor Oil)	260	260	567	567
Oil & Grease	NA	NA	NA	NA
Benzene	<0.002	<0.002	<0.5	<0.5
Toluene	<0.002	<0.002	<0.5	<0.5
Ethylbenzene	<0.002	<0.002	<0.5	<0.5
Xylenes	<0.002	<0.002	<1	<1
Lead	14	14	<15	<15
Cobalt	9.2	9.2	22	22
Chromium	39	39	<5	<5
Nickel	24	24	35	35
MTBE	<5(1)	<5(1)	14.6(2)	14.6(2)
Mercury	<0.1	<0.1	<0.2	<0.2
Cyanide	0.76	0.76	NA	NA
Ammonia	580	580	NA	NA
Other VOCs	<0.002	<0.002	<0.5	<0.5
Other SVOCs	NA	NA	19(3)	19(3)

- (1) No fuel oxygenates detected.  
 (2) MTBE = 14.6 ppb; DIPE = 2.5 ppb; no other fuel oxygenates detected in groundwater.  
 (3) Phenol = 19 ppb; no other SVOCs detected.

#### Site History and Description of Corrective Actions:

The site is an approximately 12,150 square foot commercial building on a 12,750 square foot lot. The building is currently occupied by Voila Juices. Surrounding land use is commercial and industrial. During a site reconnaissance for a Phase II Environmental Assessment, four areas of concern within the building were identified for additional investigation. Two concrete sumps containing a black, viscous liquid and two storage areas with stacked drums were identified for subsurface investigation. Five soil borings (SB-1 through SB-5) were advanced near each of the areas of concern on June 8, 2004. Groundwater samples were collected for laboratory analysis from each of the five soil borings; however, no soil samples were collected for laboratory analysis. Total petroleum hydrocarbons as diesel were detected in two of the five groundwater samples at concentrations of 143 and 188 ppb, respectively. Total petroleum hydrocarbons as motor oil were detected in groundwater at concentrations ranging from 69 to 567 ppb. MTBE was the only VOC detected in groundwater at concentrations ranging from 2.8 to 14.6 ppb. Phenol was the only SVOC detected at concentrations ranging from 2 to 19 ppb.

Four additional soil borings were advanced at the site on January 14, 2007 in order to evaluate shallow soil. Soil samples were analyzed for TPH as gasoline, TPH as diesel, TPH as motor oil, metals, VOCs, ammonia, and cyanide. TPH as motor oil was detected in one of five soil samples at a concentration of 260 ppm. Ammonia was detected in two of the five soil samples at concentrations of 15 and 580 ppm, respectively. There is no San Francisco Bay Regional Water Control Board (RWQCB) ESL or USEPA Preliminary Remediation Goal (PRG) for ammonia in soil. Based on a comparison to screening levels for ammonia used in other states, the maximum concentration of ammonia detected (580 ppm) is below soil screening levels for commercial land use. Cyanide was detected at a concentration of 0.76 ppm in one of five soil samples. There is no RWQCB ESL for cyanide; the USEPA PRG for cyanide in residential soil is 11 ppm.

**IV. CLOSURE**

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? Yes		
Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? Yes		
Does corrective action protect public health for current land use? Alameda County Environmental Health staff does not make specific determinations concerning public health risk. However, based upon the information available in our files to date, it does not appear that the release would present a risk to human health based upon current land use and conditions.		
Site Management Requirements: Case closure is granted for commercial or industrial land use only. If a change in land use to residential or other conservative scenario occurs at this property, Alameda County Environmental Health must be notified and the case needs to be re-evaluated. This site is to be entered into the City of Oakland Permit Tracking System due to the residual petroleum hydrocarbon contamination posing a nuisance for subsurface utility work.		
Should corrective action be reviewed if land use changes? Yes		
Was a deed restriction or deed notification filed? No		Date Recorded: --
Monitoring Wells Decommissioned: No	Number Decommissioned: 0	Number Retained: 0
List Enforcement Actions Taken: None		
List Enforcement Actions Rescinded: None		

**V. ADDITIONAL COMMENTS, DATA, ETC.**

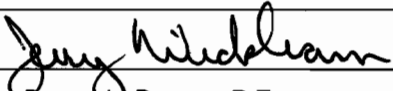
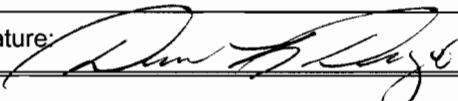
Considerations and/or Variances:

Ammonia was detected in two of the five soil samples at concentrations of 15 and 580 ppm, respectively. There is no San Francisco Bay Regional Water Control Board (RWQCB) ESL or USEPA PRG for ammonia in soil. Based upon a comparison to screening levels for ammonia used in other states, the maximum concentration of ammonia detected (580 ppm) is below soil screening levels for commercial land use. Therefore, the ammonia detected in subsurface soil does not appear to pose a significant risk to public health. In addition, ammonia can be expected to degrade with time through microbial transformations to nitrate or nitrite.

Conclusion:

Alameda County Environmental Health staff believe that the low levels of residual contamination at the site do not pose a significant threat to water resources, public health and safety, and the environment based upon the information in our files to date. No further investigation or cleanup is necessary. ACEH staff recommend case closure for this site.

**VI. LOCAL AGENCY REPRESENTATIVE DATA**

Prepared by: Jerry Wickham, P.G.	Title: Senior Hazardous Materials Specialist
Signature: 	Date: 03/27/08
Approved by: Donna L. Drogos, P.E.	Title: Supervising Hazardous Materials Specialist
Signature: 	Date: 03/27/08

This closure approval is based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions.

**VII. REGIONAL BOARD NOTIFICATION**

Regional Board Staff Name: Cherie McCaulou	Title: Engineering Geologist
RB Response: Concur, based solely upon information contained in this case closure summary.	Date Submitted to RB: 4/11/08
Signature: <i>Cherie McCaulou</i>	Date: 4/9/08

**VIII. MONITORING WELL DECOMMISSIONING**

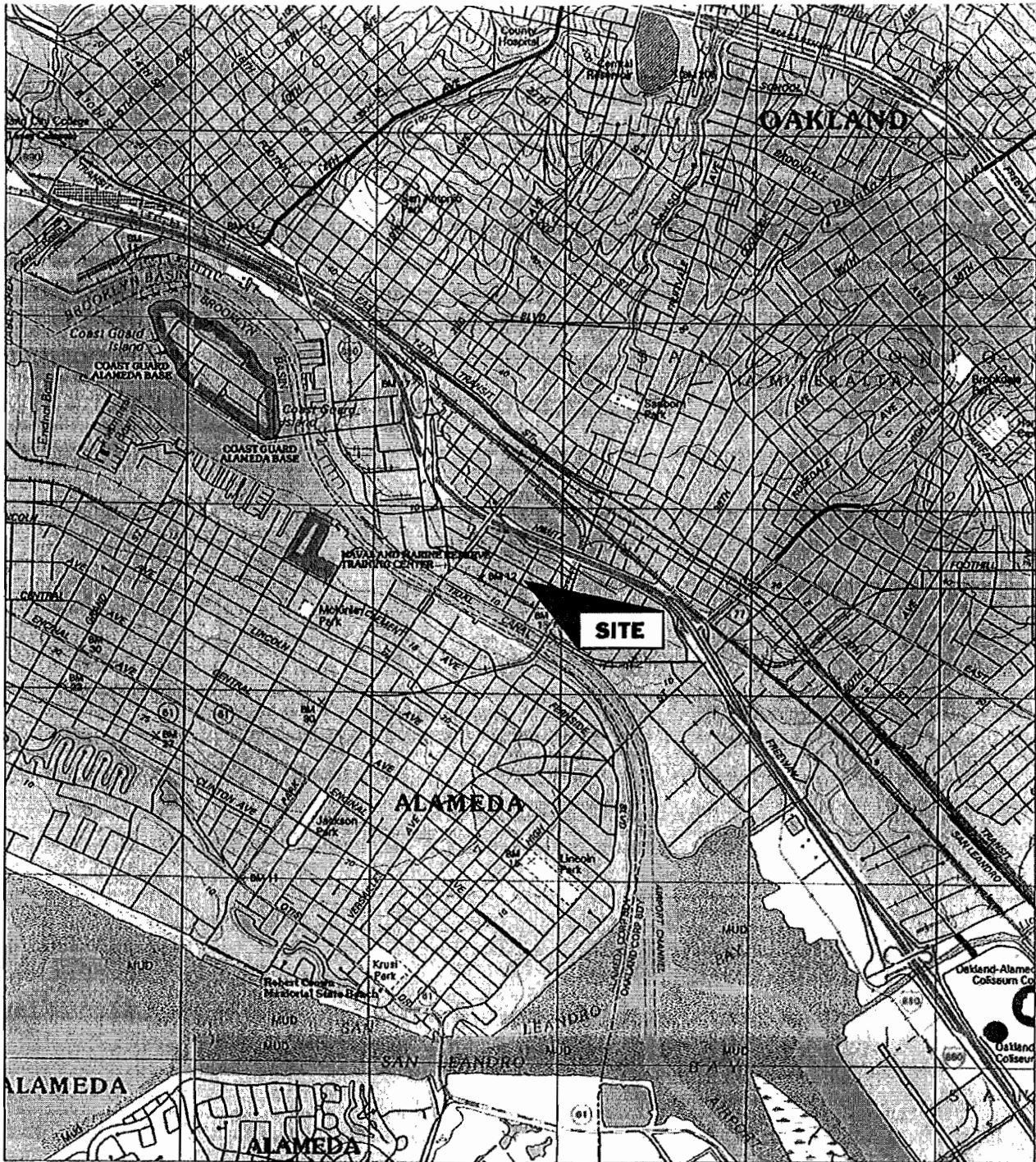
Date Requested by ACEH: No Wells	Date of Well Decommissioning Report: NA	
All Monitoring Wells Decommissioned: NA	Number Decommissioned: NA	Number Retained: NA
Reason Wells Retained: No wells		
Additional requirements for submittal of groundwater data from retained wells: NA		
ACEH Concurrence - Signature: <i>Jay Wickham</i>	Date: 04/10/08	

**Attachments:**

1. Site Vicinity Map (1 page)
2. Former Site Plan and Boring Location Map (1 page)
3. Analytical Sampling Results for Soil (1 page)
4. Analytical Sampling Results for Groundwater (1 page)
5. Boring Logs (5 pages)

This document and the related CASE CLOSURE LETTER & REMEDIAL ACTION COMPLETION CERTIFICATE shall be retained by the lead agency as part of the official site file.



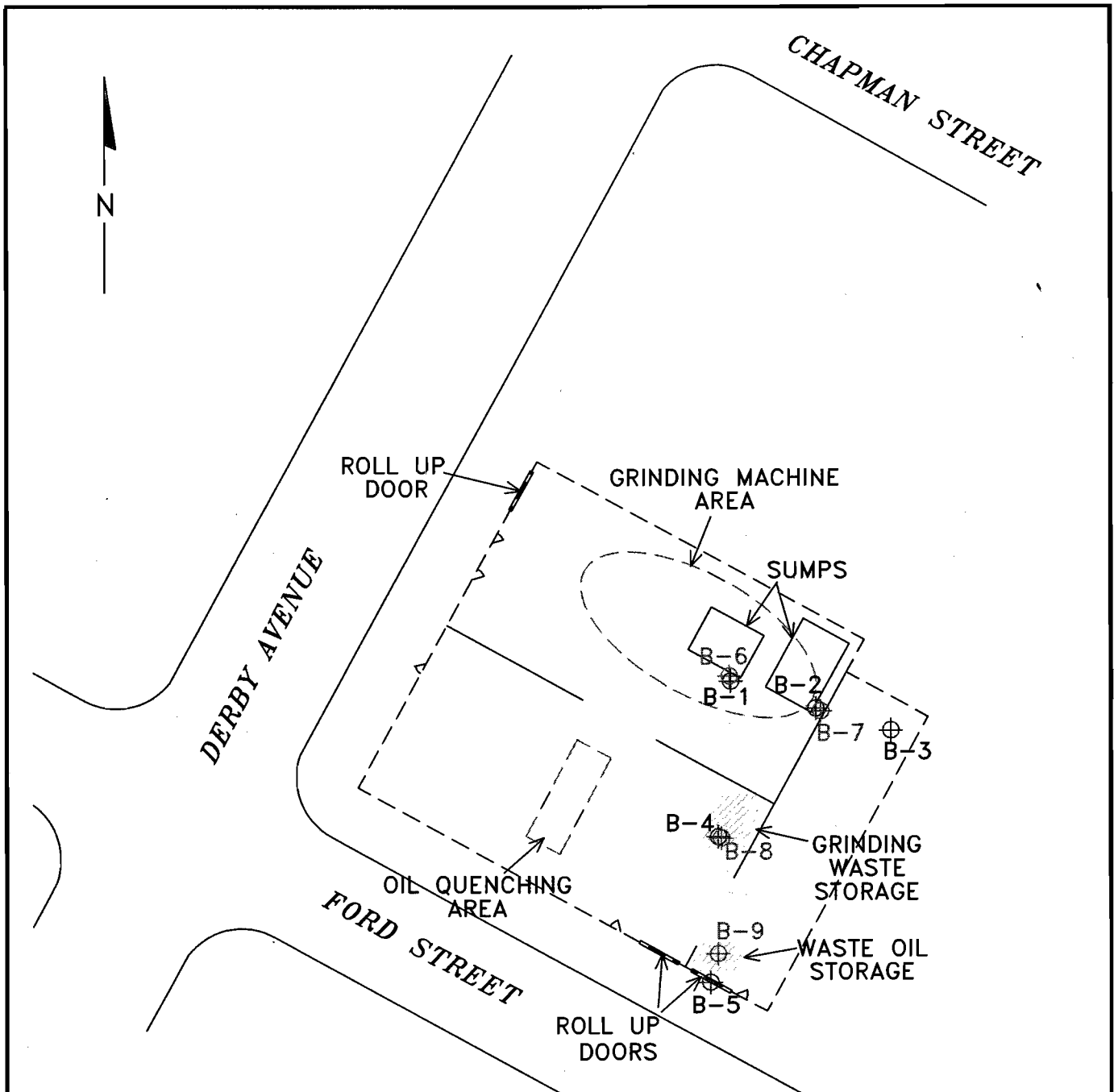


REFERENCE:  
 U.S.G.S. OAKLAND EAST, CA 1997  
 PHOTOREVISED 1980

**psi** Information  
 To Build On  
 Engineering • Consulting • Testing

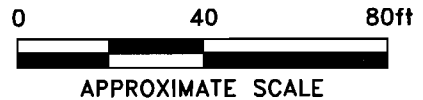
4703 Tidewater Avenue, Suite B  
 Oakland, California 94601  
 (510) 434-9200

Project Name: FORMER F&F GRINDING 510 DERBY AVENUE, OAKLAND, CA		Drawn By: D.B.	Date: 11/06	File No.: 6C021-01	Figure No.: 1
Title: SITE VICINITY MAP		Approved By: P. P.	Project No.: 575-6C021		



**EXPLANATION**

- SUBJECT STRUCTURE (PROPERTY BOUNDARY)
- APPROXIMATE SOIL BORING LOCATION (2004)
- APPROXIMATE SOIL BORING LOCATION (2007)
- FORMER DRUM STORAGE AREA



**NOTES**

1. PROPERTY BOUNDS AND STREET POSITION TAKEN FROM PARCEL MAP AND AERIAL PHOTO.
2. INTERIOR FEATURE LOCATIONS ARE APPROXIMATE - FROM PSI SITE RECONNAISSANCE AND 1995 CDMS ESA REPORT.

<b>Information To Build On</b> Engineering • Consulting • Testing		4703 Tidewater Avenue, Suite B Oakland, California 94601 (510) 434-9200			
<b>Project Name:</b> FORMER F&F PRECISION GRINDING 510 DERBY AVENUE, OAKLAND, CALIFORNIA		<b>Drawn By:</b> B.B.	<b>Date:</b> 11/07	<b>File No.:</b> 6G021-03	<b>Figure No.:</b> 2
<b>Title:</b> FORMER SITE PLAN AND BORING LOCATION MAP					

**TABLE 1**  
**SUMMARY OF SOIL ANALYTICAL DATA**  
**VOILA JUICES**  
**510 DERBY AVE, OAKLAND, CALIFORNIA**

Sample I.D.	EPA 8015M			EPA 6010	EPA 8260	Inorganics	
	TPH-G	TPH-D	TPH-MO	Metals	VOCs	Ammonia-NH3	Total Cyanide
B-6-1	ND	18	260	Barium 140 Chromium 22 Cobalt 8.0 Copper 51 Lead 6.8 Nickel 23 Vanadium 16 Zinc 27	ND	580	ND
B-6-5	ND	ND	ND	NT	NT	NT	NT
B-7-1	ND	ND	ND	Barium 160 Cadmium 2.1 Chromium 20 Cobalt 8.1 Copper 34 Lead 14 Nickel 24 Vanadium 20 Zinc 22	ND	15	ND
B-8-1.5	ND	ND	ND	Barium 44 Chromium 18 Cobalt 3.7 Copper 7.0 Nickel 12 Vanadium 5.6 Zinc 10	ND	ND	ND
B-9-1.5	ND	ND	ND	Barium 110 Chromium 39 Cobalt 9.2 Copper 12 Lead 4.8 Nickel 24 Vanadium 29 Zinc 17	ND	ND	0.76

Notes: All results are listed in milligrams per kilogram (mg/kg).

All analytes not listed were below their respective reporting limits, see Appendix C.

Samples collected on January 4, 2007.

TPH-G = Total Petroleum Hydrocarbons as Gasoline by EPA Method 8015M.

TPH-D = Total Petroleum Hydrocarbons as Diesel by EPA Method 8015M.

TPH-MO = Total Petroleum Hydrocarbons as motor Oil by EPA Method 8015M.

VOCs - Volatile Organic Compounds

ND - not detected above the laboratory reporting limit

NT - not tested



**TABLE 1**  
**SUMMARY OF GROUNDWATER ANALYTICAL DATA**  
**CB RICHARD ELLIS**  
**510 DERBY AVE, OAKLAND, CALIFORNIA**

Sample I.D.	EPA 8015M			EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 6010	EPA 8260	EPA 8270
	TPH-G	TPH-D	TPH-MO	Barium	Cobalt	Molybdenum	Nickel	Zinc	VOCs	SVOCs
B1-W	<50	<50	69	75	7	16	14	<10	MTBE - 14.6	---
B2-W	<50	143	567	87	13	46	31	<10	MTBE - 7.7	Phenol - 2
B3-W	<50	<62	92	91	<5	26	11	<10	MTBE - 5.5 DIPE - 2.5	---
B4-W	<50	<50	80	80	22	12	35	12	MTBE - 2.8	---
B5-W	<50	188	240	102	6	22	18	<10	ND	Phenol - 19

Notes: All results are listed in micrograms per liter (ug/L)  
All analytes not listed were below their respective reporting limits, see Appendix C  
<50 = Concentration below presented reporting limit  
Samples collected on June 8, 2004  
TPH-G = Total Petroleum Hydrocarbons as Gasoline by EPA Method 8015M.  
TPH-D = Total Petroleum Hydrocarbons as Diesel by EPA Method 8015M.  
TPH-MO = Total Petroleum Hydrocarbons as motor Oil by EPA Method 8015M.  
MTBE = Methyl Tertiary Butyl Ether  
DIPE = Di-isopropyl ether  
VOCs - Volatile Organic Compounds  
SVOCs - Semi-Volatile Organic Compounds  
--- = Not Tested  
ND - not detected above the laboratory reporting limit.



# SOIL BORING LOG

BORING NO: B-5  
SHEET 1 OF 1



CLIENT NAME: CB RICHARD ELLIS  
PROJECT LOCATION: 510 DERBY AVE, OAKLAND, CALIFORNIA  
PROJECT NUMBER: 575-4G023 DATE: JUNE 8, 2004  
DRILLING COMPANY: V&W DRILLING  
DRILLING METHOD: GEOPROBE PUSH-DRILL

GROUNDWATER LEVELS		
DATE	COMMENTS	DEPTH BGS
6/8/2004	INITIAL	12 FEET

DEPTH (FEET)	SAMPLE NO.	RECOVERY (IN) SAMPLE INTERVAL	BLOW COUNT	DESCRIPTION	PID (ppm)	REMARKS
0				Five inch concrete slab at surface		
1	1			SILT (ML), medium olive, trace coarse sand, few fine rounded gravel, dry.		Strong ammonia odor
2				Clayey SILT (ML), dark brown with green staining, moist, few coarse sand.		Moderate hydrocarbon odor.
3	2			As above, medium olive, few fine gravel.		Slight hydrocarbon odor.
4						Color change at 3.5 feet.
5	3					
6				SILT (ML), medium orange brown, moist, few sand.		No odor.
7	4			As above, medium olive brown, very moist, trace fine gravel.		No odor.
8						
9	5			As above, few decayed organics.		No odor.
10						
11	6			As above, very moist to wet, many fine sand.		Slight hydrocarbon odor.
12						Groundwater at approx. 12 feet.
13	7			Sandy SILT (ML), medium olive brown, very moist to wet, fine to medium sand, trace fine gravel.		No odor.
14						
15	8			SILT (ML), medium olive brown, very moist to wet, few sand, trace fine gravel.		No odor.
16						
17	9			Silty SAND (SM), medium olive brown, wet, fine to medium sand.		No odor.
18						No odor.
19				End of boring at 18.5 feet below grade.		
20				Groundwater encountered at 12 feet below grade. Boring backfilled with cement grout.		

Reviewed By:

LOGGED BY: B. BURFIELD

# SOIL BORING LOG

BORING NO:	B-6		
SHEET	1	OF	1
CLIENT NAME:	Voila Juices		
PROJECT LOCATION:	510 Derby Avenue, Oakland, CA		
PROJECT NUMBER:	575-6G021	DATE:	1/4/2007
DRILLING COMPANY:	PSI, Inc.		
DRILLING METHOD:	Hand-Auger		
GROUNDWATER LEVELS			
DATE	COMMENTS	DEPTH BGS	

DEPTH (FEET)	SAMPLE NO.	RECOVERY (IN) SAMPLE INTERVAL	BLOW COUNT	DESCRIPTION	USCS	REMARKS
				6 INCHES CONCRETE		
1	B-6-1			Gravelly SAND; medium brown		PID 1.2
2				Clayey SILT; medium olive brown		PID 3.5
3				As above		PID 6.6
4				As Above		PID 1.5
5	B-6-5			As Above		PID 0.3
6				BORING TERMINATED AT 5.5 FEET BELOW GROUND SURFACE NO GROUNDWATER ENCOUNTERED BORE HOLD BACKFILLED WITH DIRT AND CAPPED WITH CONCRETE		
7						
8						
9						
10						
11						
12						

Reviewed By:	LOGGED BY: T. JONES
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# SOIL BORING LOG

BORING NO: **B-7**  
 SHEET **1** OF **1**

CLIENT NAME: Voila Juices  
 PROJECT LOCATION: 510 Derby Avenue, Oakland, CA  
 PROJECT NUMBER: 575-6G021 DATE: 1/4/2007  
 DRILLING COMPANY: PSI, Inc.  
 DRILLING METHOD: Hand-Auger

GROUNDWATER LEVELS		
DATE	COMMENTS	DEPTH BGS

DEPTH (FEET)	SAMPLE NO.	RECOVERY (IN) SAMPLE INTERVAL	BLOW COUNT	DESCRIPTION	USCS	REMARKS
				6 INCHES CONCRETE		
1	B-7-1			Clayey SILT; dark brown		PID 0.6
2				As Above		PID 0.7
3				As above		PID 0.4
4				Clayey SILT; olive brown		PID 0.3
5	B-7-5			CLAY; olive brown		PID 0.0
6				BORING TERMINATED AT 5.5 FEET BELOW GROUND SURFACE NO GROUNDWATER ENCOUNTERED BORE HOLD BACKFILLED WITH DIRT AND CAPPED WITH CONCRETE		
7						
8						
9						
10						
11						
12						

Reviewed By: \_\_\_\_\_ LOGGED BY: T. JONES

# SOIL BORING LOG

BORING NO:	<b>B-8</b>
SHEET	<b>1 OF 1</b>

CLIENT NAME:	Voila Juices		
PROJECT LOCATION:	510 Derby Avenue, Oakland, CA		
PROJECT NUMBER:	575-6G021	DATE:	1/4/2007
DRILLING COMPANY:	PSI, Inc.		
DRILLING METHOD:	Hand-Auger		

GROUNDWATER LEVELS		
DATE	COMMENTS	DEPTH BGS

DEPTH (FEET)	SAMPLE NO.	RECOVERY (IN) SAMPLE INTERVAL	BLOW COUNT	DESCRIPTION	USCS	REMARKS
1				14 INCHES CONCRETE		
2	B-8-1.5			Clayey SILT; dark brown		PID 0.0
3				As Above		PID 0.0
4				As Above		PID 0.0
5	B-8-5			As Above		PID 0.0
6				BORING TERMINATED AT 5.5 FEET BELOW GROUND SURFACE NO GROUNDWATER ENCOUNTERED BORE HOLD BACKFILLED WITH DIRT AND CAPPED WITH CONCRETE		
7						
8						
9						
10						
11						
12						

Reviewed By:	LOGGED BY: T. JONES
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# SOIL BORING LOG

BORING NO: **B-9**  
 SHEET **1** OF **1**

CLIENT NAME: Voila Juices  
 PROJECT LOCATION: 510 Derby Avenue, Oakland, CA  
 PROJECT NUMBER: 575-6G021 DATE: 1/4/2007  
 DRILLING COMPANY: PSI, Inc.  
 DRILLING METHOD: Hand-Auger

GROUNDWATER LEVELS		
DATE	COMMENTS	DEPTH BGS

DEPTH (FEET)	SAMPLE NO.	RECOVERY (IN) SAMPLE INTERVAL	BLOW COUNT	DESCRIPTION	USCS	REMARKS
1				14 INCHES CONCRETE		
2	B-9-1.5			Clayey SILT; dark brown		PID 0.6
3				As Above		PID 0.0
4				As Above		PID 0.0
5	B-9-5			CLAY; gray		PID 2.5
6				BORING TERMINATED AT 5.5 FEET BELOW GROUND SURFACE NO GROUNDWATER ENCOUNTERED BORE HOLD BACKFILLED WITH DIRT AND CAPPED WITH CONCRETE		
7						
8						
9						
10						
11						
12						

Reviewed By: \_\_\_\_\_ LOGGED BY: T. JONES