ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

December 8, 2006

Mr. Lawrence Hancock
Country Club Cleaners
500 Bollinger Canyon Way #A4
San Ramon, CA 94582

Mr. Mark Ratto
Peter J. Ratto Trust
670 W. Fruit Cive Forest Road
Jacksonville, FL 32259

Mr. Robert Strong
Country Club Cleaners
500 Bollinger Canyon Way #A4
San Ramon, CA 94582

Subject: SLIC Case **RO0002913**, Perciva/Metro Valley Cleaners, 224 Rickenbacker Circle, Livermore, CA – Request for Revised Work Plan

Dear Mr. Hancock, Mr. Strong, and Mr. Ratto:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recent work plan entitled, "Workplan for Soil and Groundwater Sampling," dated November 17, 2006, and prepared by Engeo, Incorporated. The work plan proposes five soil borings to collect soil and groundwater samples. The proposed scope of work addresses the technical comments contained in our July 6, 2006 correspondence regarding defining the vertical extent of contamination and proposes one soil boring along the assumed sanitary sewer alignment but does not address other potential areas of concern on the site. Therefore, we request that you prepare **a revised work plan by January 26, 2007** that addresses the technical comments below.

TECHNICAL COMMENTS

1. **Base Map.** The base map included in the work plan is an improvement from the base map provided in the "Subsurface Investigation for Phase II Site Assessment," dated October 28, 2005, prepared by JMK Environmental Solutions, Inc. However, the base map **must** show the site features to scale. We request that you prepare a revised base map that shows the site and building to scale, the types of surface cover (concrete, asphalt, bare ground, etc.), all potential areas of concern (including those listed in technical comment 2), surface drains inside and outside the building, directions of surface drainage across the site, and any other site features relevant to evaluating potential spills or discharges. Please present the base map in the revised Work Plan requested below.

2. **Other Areas of Concern.** Several potential sources of soil and groundwater contamination exist for the site in addition to the dry cleaning machine area and sanitary sewer. Various chemical products and wastes were improperly stored inside the facility, inside the boiler room, in the rear fenced yard, and in the dumpster enclosure. Please see the attached Notice of Violation from Livermore-Pleasanton Fire Department dated September 20, 2005 and Sampling Report from the California Department of Toxic Substances Control dated

January 9, 2006. We require some investigation of these areas of concern to evaluate whether discharges to soil and groundwater may have occurred. Please see technical comment 3 below regarding soil vapor sampling and phased investigation.

3. **Soil Vapor Sampling and Phased Investigation**. In order to assess possible discharge of volatile compounds in the areas of potential discharge of chemicals or waste, please propose soil vapor sampling as a first phase of investigation. Soil vapor sampling can be implemented more cost effectively than soil borings to allow a greater number of sampling locations within the areas of concern. Soil vapor sampling is to be conducted within the areas formerly used for chemical or waste storage, any areas of surface staining, the dry cleaning machine area, and along the sanitary sewer. We suggest that you conduct soil vapor sampling using a mobile laboratory to allow real time review of results to guide the investigation. Step out soil vapor sampling locations would be selected in the field, thereby avoiding multiple mobilizations to define the potential extent of elevated concentrations of volatile compounds in soil vapor. Please present your plans for soil vapor sampling in the revised Work Plan requested below.

4. **Proposed Soil and Groundwater Sampling.** We concur that soil borings are required in the dry cleaning machine area based on the existing analytical data. Soil borings may also be required in other areas of concern. The locations and numbers of soil borings should be based on soil vapor sampling results. Please include a revised proposal for soil and groundwater sampling based on soil vapor sampling in the revised Work Plan requested below.

5. **Laboratory Analyses.** The proposed analysis of soil and groundwater samples for volatile organic compounds by EPA Method 8260 is acceptable. We request that you also include analyses for total petroleum hydrocarbons by EPA Method 8015 to quantify the aliphatic hydrocarbons contained in the chemical products stored and used on site. Please present the proposed analyses in the revised Work Plan requested below.

6. **Groundwater Flow Direction.** The Work Plan indicates that the assumed groundwater flow direction is to the northwest based on groundwater monitoring well data in the general site vicinity. The regional groundwater flow direction in this area of the Livermore-Amador Basin is to the west or southwest. Please expand the discussion of presumed groundwater flow direction in the revised Work Plan requested below to identify the basis for the assumed groundwater flow direction and discuss the discrepancy with the regional flow direction in this area of the basin.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **January 26, 2007** – Revised Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

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

Sincerely,

Jerry Wickham, P.G.
Hazardous Materials Specialist

Attachments: Notice of Violation from Livermore Pleasanton Fire Department dated September 20, 2005 and Sampling Report from California Department of Toxic Substances Control dated

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566

Paul Smith, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566

Kelly Krohn, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583-4634

James Hawley, Hoge, Fenton, Jones & Appel, 60 South Market Street, Suite 1400 San Jose, CA 95113-2396

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Certified mailer #

September 20, 2005

Mark Ratto
Trustee, Peter J. Ratto Trust
670 West Fruit Cove Forest Road
Jacksonville, Florida 32259

****** Notice of Violation ******

Re: Hazardous Materials/Waste and Fire Code violations associated with the 224 Rickenbacker Circle, Livermore, CA 94550

Dear Mr. Ratto:

This letter follows up on a site inspection conducted on August 10, 2005 at the abandoned dry cleaning facility at the above location. The inspection was conducted in conjunction with the California Department of Toxic Substances Control pursuant to inspection warrant # 2005-0844 (attached). During the inspection, several violations were noted. I have broken these into two categories:

- Issues necessary to address closure of Metro Valley Cleaners and,
- Issues to be resolved prior to occupancy of the subject building by any future occupant.

Compliance issues:
The following containers were noted containing various chemical products and wastes stored onsite:
Inside the facility:
(1) 15 gallon container labeled Fabritec 5560, approximately ¼ full
(1) 5 gallon container labeled Kleerwhite
(2) Green Earth Dry cleaning machines are noted onsite. Each machine contains three tanks. One machine contained approximately 122 gallons, another contained approximately 156 gallons.
(1) 1 gallon metal container labeled Pronto Brush Cleaner was noted stored on a bench in the dry cleaning work area.

Inside the boiler room:
(1) approximately 55 gallon blue polyethylene drum with a large uncovered opening 10" deep containing an unknown light brown material
(1) approximately 200 gallon tank was noted mounted on a stand 3 feet above grade was observed about ½ full of an unknown liquid.

The following were noted outside the facility (rear fenced yard):
(8) 16 gallon containers labeled Cyclopentasiloxane, 4 were partially full, 4 were full
(13) 16 gallon containers labeled Silicone Siloxane, 9 were partially full, 4 were empty
Some of the above drums do not have bung plugs, are stored uncovered and in the yard unsecured.
(1) 5 gallon can labeled Behr paint, contained approximately 3 gallons of what appears to be grey latex based paint
(14) filters which appear to be dry cleaning machine filters were noted scattered outside the back yard on the asphalt.

The following were noted outside the facility in dumpster enclosure:
(3) 55 gallon drums were labeled 1,2,3 NOTOX, aliphatic hydrocarbon
(1) 55 gallon drum was labeled Drylene 800
(1) 55 gallon drum was labeled Silicone Fluid (SB32) and contained approximately 16" of what appeared to be conspicuously contaminated waste material.
(1) 55 gallon drum labeled aliphatic hydrocarbon and contained approximately 8" of conspicuously contaminated waste material
(3) 16 gallon plastic drums containing full or partial contaminated dry cleaning lint waste material
(3) 5 gallon buckets, one open, containing unknown liquid material. The open buckets appeared to contain contaminated solvent waste.

Required actions to provide closure of the business activities at 224 Rickenbacker Circle:

1. Section 8001.3.1 of the California Fire Code (CFC, 2001 edition) requires proper closure of all hazardous materials facilities. "Permits are required to install, repair, abandon, remove, place temporarily out of service, close or substantially modify a storage facility or other area regulated by Article 80. Permitee shall apply for approval to close storage, use or handling facilities at least 30 days prior to the termination of the storage, use or handling of hazardous materials. Such application shall include and change or alteration of the facility closure plan filed pursuant to Section 8001.13." **You are therefore required to complete and submit to Livermore Pleasanton Fire Department (LPFD) a Closure Plan addressing the proposed proper disposition of all hazardous materials and wastes currently onsite.**
2. You are required to perform waste determination on all materials and waste to determine how these should be managed.
3. Properly store all hazardous materials and wastes. Drums are noted stored outside uncovered; waste filters are strewn around the back yard uncontained and improperly managed. You are required to secure all drums with proper lids and store waste filters in drums within 14 days.
4. Hazardous Waste Control laws specified in Title 22, CA Code of Regulations and Chapter 6.5 of the CA Health and Safety Code, require that wastes are properly managed within specific time periods, typically 90 days, after the waste has been generated. Materials and wastes noted above have apparently

been abandoned. This is illegal. You are required to evacuate contents of all tanks, drums and machines and to properly manage all of the above hazardous materials and waste and containers noted above. **Provide copies of all disposal documentation for all materials and wastes including bill of ladings and hazardous waste manifests indicating proper management of the above within 30 days of the date of this letter.**

5. There are several tanks, boilers and drums containing unknown materials/wastes. You are required to empty all containers and properly close and decommission the dry cleaning operation leaving all vessels empty at the site. Confirm in writing that all decommissioned equipment has been properly managed.

Issues requiring immediate attention:

6.

a) The rear portion of the site was unsecured during my August 11 inspection. Section 8.08.630 of the Livermore Municipal Ordinance Code (LMOC) requires that all receptacles, containers, storage areas and vehicles containing solid waste, recyclable materials or compostable materials shall be sufficiently covered or otherwise secured to prevent such material from escaping.

b) Illegal dumping of carpeting, trash and glass has occurred and appears to be ongoing. Sections 8.08.500 and 8.08.560 LMOC prohibits depositing of litter on private property.

c) Tall dry weeds are noted in the front, sides, and rear of the facility. Remove all items noted above. Section 8.14.020 LMOC prohibits allowing overgrown vegetation likely to harbor rats of vermin or constituting unsightly appearance, dangerous to public safety and welfare or detrimental to neighboring properties or property values and visible from a public street.

d) Secure this site so that it is inaccessible to the general public within 14 days. Please contact me to provide a copy of the key (preferred) or combination to the padlock for LPFD access (in the event of an emergency) to the onsite Knox box at you earliest convenience. Section 902.3.1, CFC requires that exterior doors and openings required by this code or the Building Code shall be maintained readily accessible for emergency access by the fire department.

You are required to address each of these issues outlining your intentions in writing within 14 days.

Issues requiring attention prior to occupancy of building:

7. At least two electrical panels have been severely damaged requiring repair prior to restoring electrical service in the building. I observed all main wires coming into and leaving the panels to have been cut. You are required to contact the City of Livermore Building Department before repair of electrical system or before performing any other structural repairs at the above address.

8. There was no record on the fire sprinkler system riser for any maintenance on the system. A 5 year sprinkler certification is required.
9. Ceiling tiles are missing and damaged. Missing panels are required to be replaced prior to occupancy.
10. All fire extinguishers are either missing or are out of certification. These will need to be replaced/recertified.

***Mismanagement and abandonment* of hazardous waste violations carry significant penalties; see CA Health and Safety Code Sections: 25189.2b, 25190 and 25189.5. Failure to comply will result in further enforcement actions to be taken. You, personally as trustee, the Peter J. Ratto Trust, and Persiva Corporation are each considered responsible and/or potentially responsible parties.**

You are required to comply with each of the above directives within timelines previously specified. Please provide a written response and Closure Plan addressing your proposal for proper disposition of all hazardous materials and waste containers including a response to each of the above issues within 30 days.

Please contact me if you wish to discuss any of the above at (925) 454-2339 or psmith@lpfire.org.

Sincerely,

Paul M. Smith
Hazardous Materials Inspector

C:

- Dennis Miller Esq., Stein & Lubin LLP, 600 Montgomery St, 14th Floor, San Francisco, CA 94111
- Kenneth Goessling, Asset Management Specialist, GE Commercial Finance, 635 Marysville Center Dr., Suite 120, St Louis, MO 63141
- Andy Vanderheiden, Dave Dyer,, City of Livermore Building Department, 1052 South Livermore Ave., Livermore, CA 945550
- Ann Prinz, City of Livermore Building Department, Community Preservation Division, 1052 South Livermore Ave., Livermore, CA 94550
- Robert Aragon, Department Toxic Substances Control, Task Force Support & Special Investigations Branch, 700 Heinz Way, Suite 200, Berkeley, CA 94710
- Kevin Young, Assistant City Attorney, City of Livermore, 1052 S. Livermore Ave., Livermore, CA 94550
- Alyce Sandbach, Alameda County District Attorney's Office, Consumer & Environmental Protection Division, 7677 Oakport Dr, 6th Floor, Oakland, CA 94621

DB #471

PS

Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA

Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

Arnold Schwarzenegger
Governor

SAMPLING REPORT

Persiva Corporation
dba Valley Cleaners

224 Rickenbacker Circle
Livermore, California 94550

Report Completed By:	Robert Aragon, P.E., MS
Sampling Date:	August 10, 2005
Report Date:	January 9, 2006

I. PURPOSE AND SUMMARY

The Livermore-Pleasanton Fire Department requested the assistance of The Department of Toxic Substances Control's (DTSC) Task Force Support and Special Investigations Branch (TFS/SIB) in their investigation of Persiva Corporation, dba Valley Cleaners. Valley Cleaners is a closed commercial laundry in Livermore, California. Abandoned waste on the property includes drums of Cyclopentasiloxane and Silicone Siloxane.

We took nine samples from drums and two tanks. The samples were analyzed for pH (corrosivity) and ignitability. All of the samples were non-hazardous.

II. REPRESENTATIVES PRESENT

Livermore-Pleasanton Fire Department:
Paul Smith, Hazardous Materials Inspector

Alameda County District Attorney's Office:
Hansen Pang, Inspector

DTSC, TFS/SIB:
Robert Aragon, Senior Hazardous Substances Engineer

III. SAMPLING

August 10, 2005

Mr. Pang and I arrived on site where we met Mr. Smith. There were no owners or employees on site. We received prior permission to enter the site from an Inspection Warrant dated August 4, 2005. Mr. Smith had a key to a sliding gate in the back of the property but we found the gate unlocked.

The site has a large open back area that is fenced and paved. We observed a lot of debris, old carpets, hangers, mechanical equipment and an old truck. There were 25 sixteen-gallon drums of Cyclopentasiloxane and Silicone Siloxane in the fenced area. We took our first three samples from these drums. The building contains dry cleaning and ironing machines. There is a utility room inside the building where we took the two tank samples. There is a covered shed outside of the fenced area that contained six 55-gallon drums and some containers of lint. We took four samples from the 55-gallon drums.

I took all of the samples by using clean new glass coliwassas. I used new clean 16-ounce pre-labeled glass jars with Teflon lids. I put evidence tape around all of the samples and then put them in a cooler in the DTSC sampling truck.

I took 114 photographs of the site. They show more detail about the labels on the containers and inside the building but they are not included here.

Outside Fenced Area – Samples MVC01 through MVC03

Photos no. 1 through 4 show the debris and drums in the outside fenced area. There were 25 sixteen-gallon containers in the area. Four drums were together on a wooden pallet (photo no. 3) and 21 other drums were together on wooden pallets (photo no. 4).

Sample MVC01 was taken from the drum in the front right side of photo no. 3. It was a clear liquid. The label on the drum indicating it contains Cyclopentasiloxane is shown in photo no. 5. The sample with the evidence tape around it is shown in photo no. 6.

Sample MVC02 was taken from the drum stacked on top of another drum, shown in the upper left hand corner of photo no. 4. The drums were stacked two high so we put the drum on the ground to take the sample. It is shown again in photo no. 7. It was labeled Silicone Siloxane. One of the Silicone Siloxane labels is shown in photo no. 8. The sample was also a clear liquid. I put evidence tape around it and took photo no. 9.

We moved the drums around so we could see the labels. We sorted them into two sections. We moved the 8 drums labeled Cyclopentasiloxane to the left with the other four on the wooden pallet (photo no. 10) and the 13 drums labeled Silicone Siloxane to the right (photo no. 11). We took one more sample from a drum labeled Cyclopentasiloxane. Sample MVC03 was taken from the drum in the right side of the

middle row shown in photo no. 10. It was a clear liquid. I took photo no. 12 showing the evidence tape around the sample.

Photo no. 1: The outside fenced area.

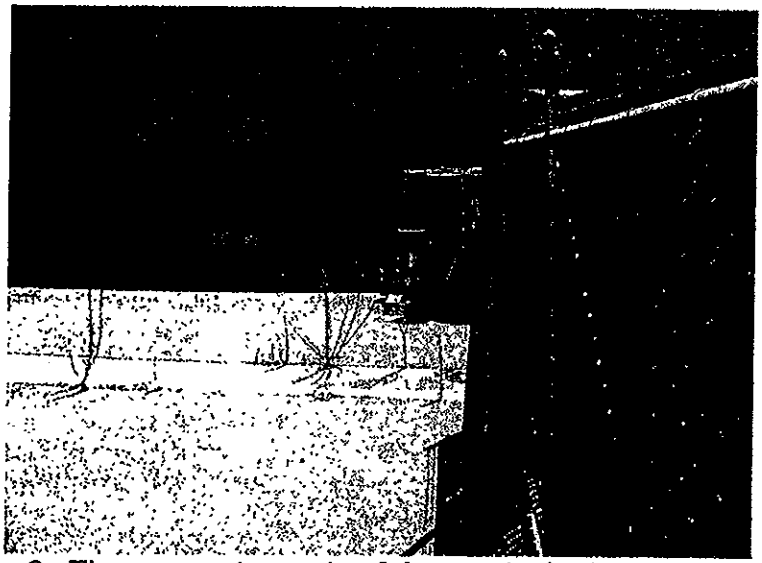

Photo no. 2: There were two sets of drums stacked in the outside area.

Photo no. 3: Four drums of Cyclopentasiloxane.
Sample MVC01 was taken from the drum in the front row, on the right.

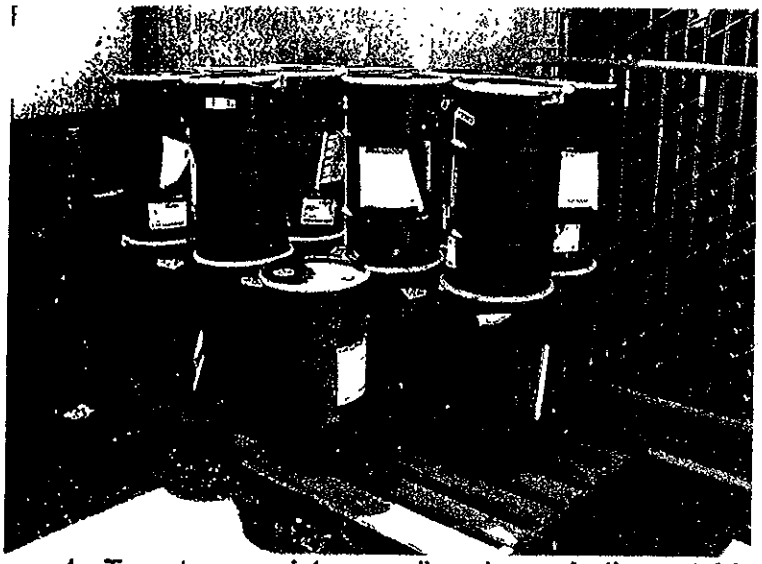

Photo no. 4: Twenty-one sixteen-gallon drums in the outside area.
Sample MVC02 was taken from the drum in the upper left corner.

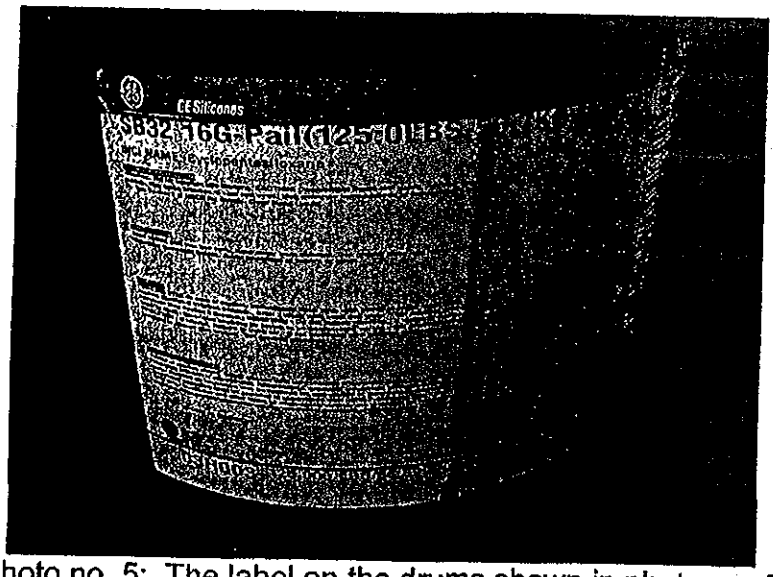

Photo no. 5: The label on the drums shown in photo no. 3 Indicates they contain Cyclopentasiloxane.

Photo no. 6: Sample MVC01 was taken from the drum in front with the glass coliwassa sticking out of the bung hole of the drum.

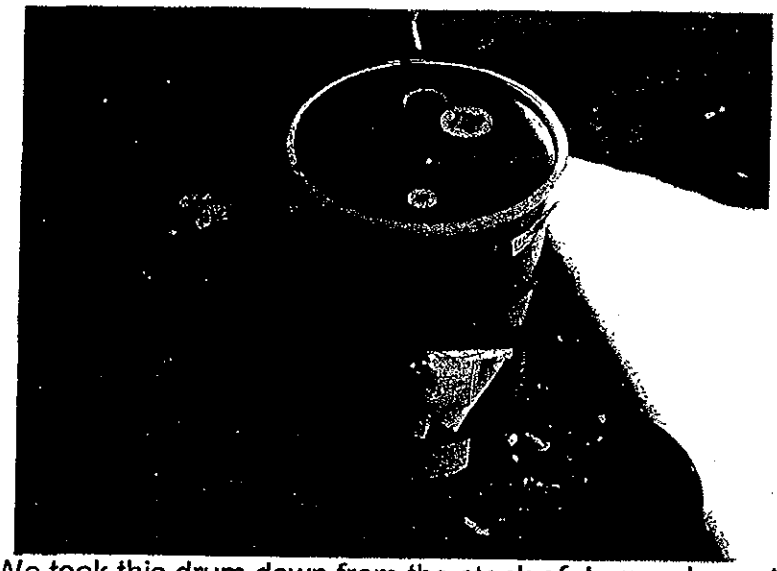

Photo no. 7: We took this drum down from the stack of drums shown in photo no. 4. Sample MVC02 was taken from this drum that was labeled Silicone Siloxane.

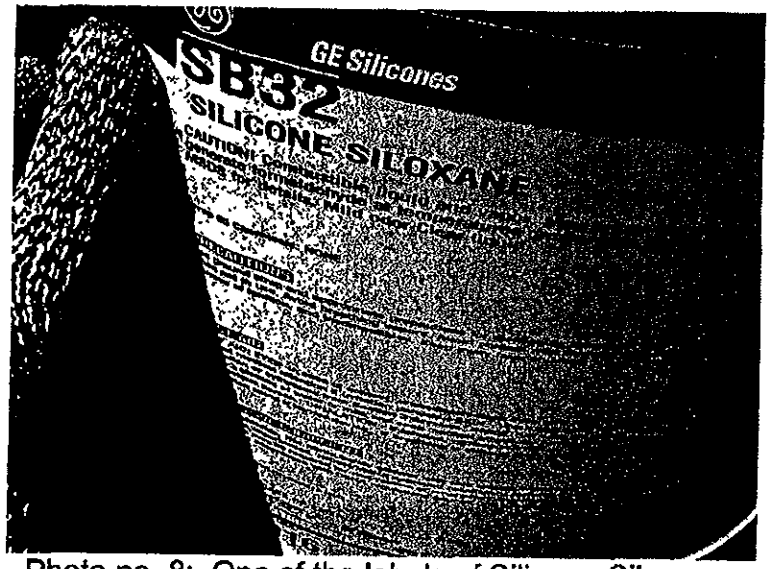

Photo no. 8: One of the labels of Silicone Siloxane.

Photo no. 9: Sample MVC02 after it was taken.

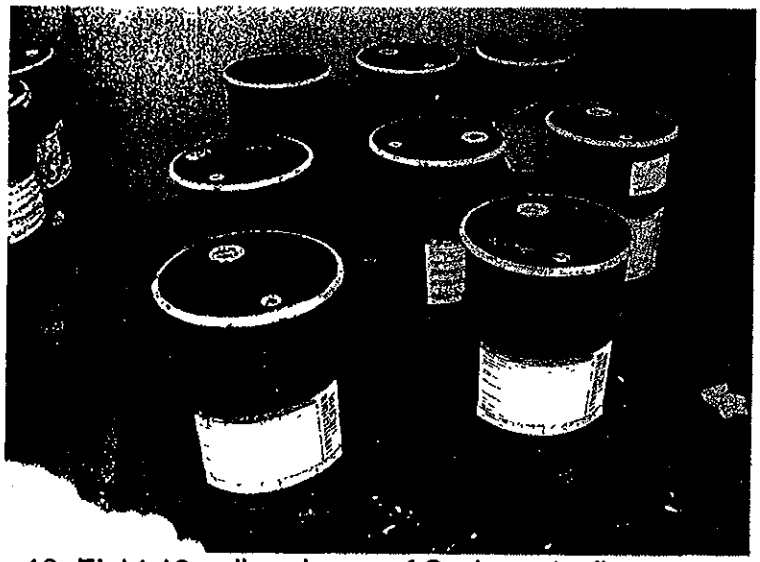

Photo no. 10: Eight 16-gallon drums of Cyclopentasiloxane were moved over with the other four drums. Sample MVC03 was taken from the drum in the middle row, on the right.

Photo no. 11: Thirteen 16-gallon drums labeled Silicone Siloxane.

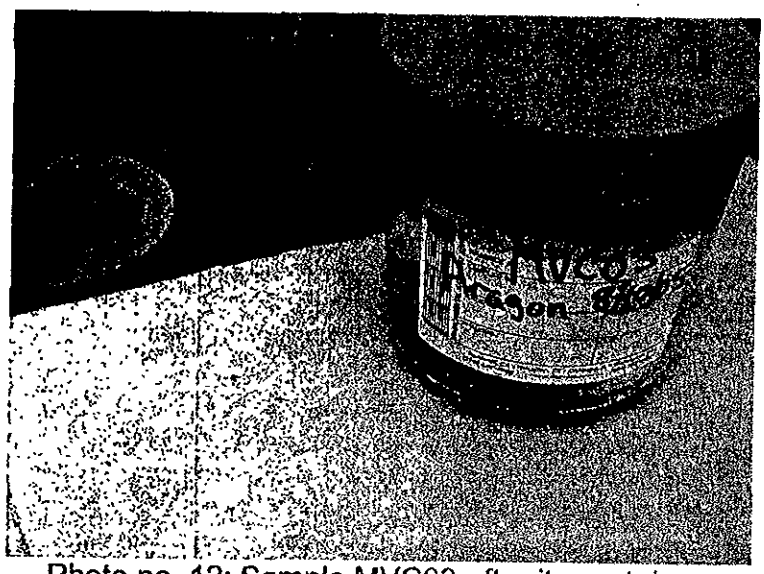

Photo no. 12: Sample MVC03 after it was taken.

Inside the Utility Room – Samples MVC04 and MVC05

There were two tanks inside the utility room that contained liquids. The blue poly tank and black elevated tank are shown in photo no. 13. The black tank was some kind of process tank that had a lot of pipes connected to it. Sample MVC04 was taken from the black tank. It was a rust colored liquid and it is shown in photo no. 14. Sample MVC05 was taken from the blue poly tank. The blue tank appeared to be a chemical feed tank. It contained a clear liquid. Sample MVC05 is shown in photo no. 15. I put evidence tape around the lids of the jars and put them into the DTSC sampling truck.

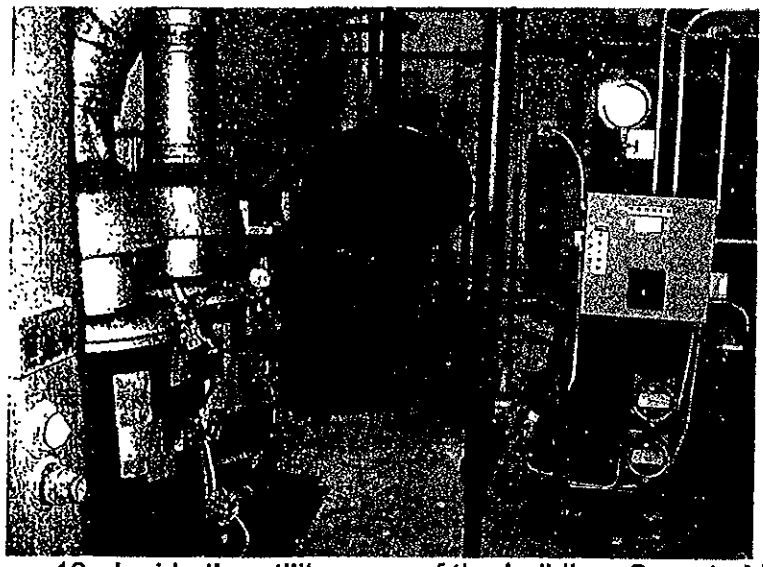

Photo no. 13: Inside the utility room of the building. Sample MVC04 was taken from the black elevated tank in the back while sample MVC05 was taken from the blue tank in front of it.

Photo no. 14: Sample MVC04 after it was taken from the back tank.

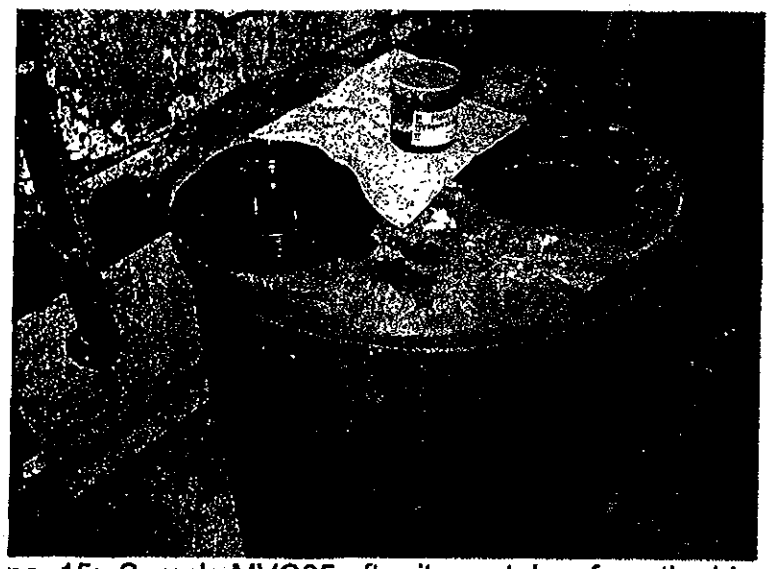

Photo no. 15: Sample MVC05 after it was taken from the blue tank.

Storage Shed Outside of the Fenced Area – Sample MVC06 through MVC09

There is an enclosure outside of the fenced area that may have been a dumpster enclosure at one time. It contained six 55-gallon drums and some containers of lint (photo no. 16). The area was not locked and there was access to it from the adjacent businesses. The waste in the enclosure appeared to be the dry cleaning waste similar to the containers inside the fenced area.

We took four samples from the 55-gallon metal drums. Sample MVC06 was taken from the black metal drum in the middle of the back row. The drum had a label on it that indicates it held Notox, CAS64742-48-9, aliphatic hydrocarbons. The drum contained a clear liquid. Sample MVC07 was taken from the blue metal drum on the right side of the back row. The label on the drum indicated it held dry cleaning solvent. It was also a clear liquid. Sample MVC08 was taken from the black metal drum in the middle of the three drums along the right side of the enclosure. The label on the drum indicated it held Cyclopentasiloxane. Sample MVC09 was taken from the grey and red metal drum in the front of the three drums along the right side of the enclosure. The label on the drum indicates it held dry cleaning waste. The samples are shown in photos no. 17 through 20 with the evidence tape around them.

Photo no. 16: The drums and containers inside the enclosure located outside of the fenced area. Samples MVC06 through MVC09 were taken from the 55-gallon drums.

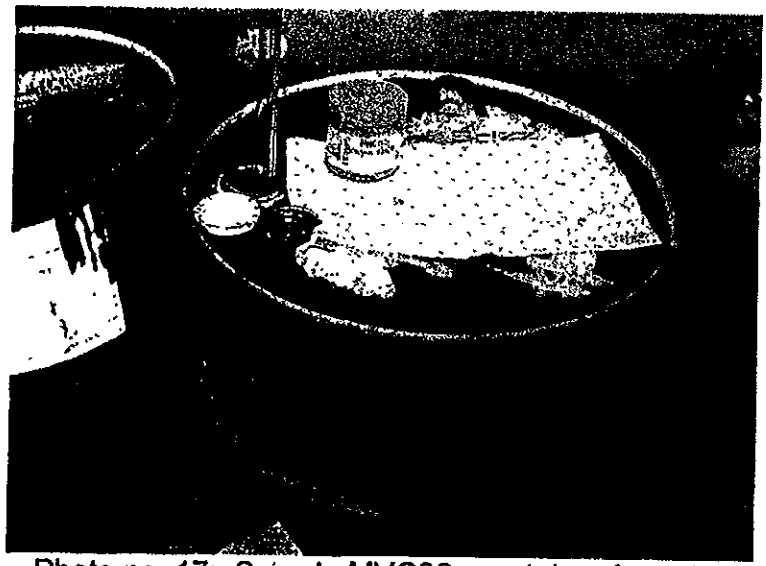

Photo no. 17: Sample MVC06 was taken from the black drum in the middle of the back row.

Photo no. 18: Sample MVC07 after it was taken from the blue drum on the right side of the back row.

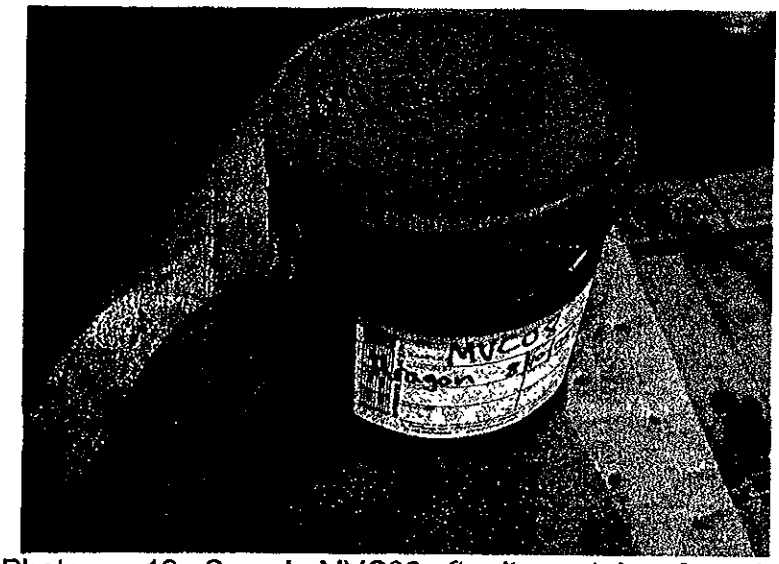

Photo no. 19: Sample MVC08 after it was taken from the black drum in the middle row of the right side.

Photo no. 20: Sample MVC09 after it was taken from the grey and red drum in the front of the right side.

We put the samples in the cooler and locked them in the DTSC sampling truck. I brought the samples to DTSC's Hazardous Materials Laboratory (HML) in Berkeley on August 11, 2005. I filled out the Hazardous Materials Sample Analysis Request and Chain of Custody Form and signed line 18.a. (Attachment A). Mr. Denesh Chand took custody of the samples at HML and signed line 18.b.

IV. ANALYTICAL RESULTS HAZARDOUS WASTE DETERMINATION

I requested analysis for pH (corrosivity) and ignitability. The ignitability results are dated August 22, 2005 while the pH results are dated August 23, 2005 (Attachment B). The results indicate the ignitability of all the samples is less than 140° Fahrenheit and the pH ranges from 4.3 to 9.94. Based on these results the contents of the sampled containers is not a hazardous waste due to pH or ignitability.

V. ATTACHMENTS

A. Hazardous Materials Sample Analysis Request and Chain of Custody Form (2 pages).
B. Analytical Reports from HML. Ignitability results dated August 22, 2005 (1 page) and pH results dated August 23, 2005 (2 pages).

R. Aragon

Robert A. Aragon, P.E., MS
Senior Hazardous Substances Engineer
Task Force Support/Special Investigations Branch

January 9, 2006
Date

ATTACMENT A

Hazardous Materials Sample Analysis Request
and Chain of Custody Form (2 pages)

State of California
California Environmental Protection Agency

Department of Toxic Substances Control
Hazardous Materials Laboratories

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: HMU577

HML No. To

2. Page 1 of 2

3. REQUESTOR: Robert Aragon

4. Phone (510) 540-3904

5. ADDRESS (To Receive Results)
700 Heinz Avenue
Berkeley, California 94710

6. FAX (510) 540-3891

7. TAT Level: (check one)
☐ *1 ☒ 2 ☐ 3 ☐ 4
* Unit Chief's Signature

8. DATE SAMPLED: AUGUST 10, 2005

9. Codes (fill in all applicable codes)

a. Office	0	2						
b. INDEX	4	0	4	0				
c. PCA	3	6	2	1	1			
d. MPC								
e. SITE								
f. County	0	1						

10. ACTIVITY: ☐ SCD ☐ SRPD ☐ CIB ☐ SMB ☐ FPB ☐ SPPT ☒ Others

11. SAMPLING LOCATION
a. EPA ID No.: CAR000068262
b. Site: Metro Valley Cleaners
c. Address: 224 Rickenbacker Circle, Livermore 94550
(Number / Street / City / ZIP)

12. SAMPLES:

a. ID	b. Collector's No.	c. HML No.	d. Sample Type	e. Container Type	f. Size	g. Field Information
A	MVC01		liquid	Glass	16-oz	Cyclopentasiloxane
B	MVC02		liquid	"	"	Silicone Siloxane
C	MVC03		liquid	"	"	Cyclopentasiloxane
D	MVC04		liquid	"	"	Dry Cleaning Waste
E	MVC05		liquid	"	"	Dry Cleaning Waste
F	MVC06		liquid	"	"	Notox CAS64742-48-9 (Aliphatic Hydrocarbon)

13. ANALYSIS REQUESTED: (X desired analysis and enter I.Ds from 12.a.)

INORGANIC ANALYSIS	Sample(s) ID
☒ pH	A-F
☐ Metals Scan (6010)	
☐ Metal(s) Specific	
☐ WET	
☐ Cyanides	
☐ (others, write in)	
☐ (others, write in)	

TCLP Analysis	(only if necessary)	(do TCLP regardless)
☐ Metals		
☐ Mercury		
☐ Volatiles		
☐ Semivolatiles		
☐ (others, write in)		

ORGANIC ANALYSIS	Sample(s) ID
☐ CL-Pesticides (8081)	
☐ OP-Pesticides (8141)	
☐ PCBs (8082)	
☐ G R O (8015B)	
☐ D R O / Motor Oil / Both (circle one)	
☐ n-Hexane Extractables (1664)	
☒ Flash Point (1020)	A-F
☐ VOCs Including BTEX (8260)	
☐ VOCs - LO Level (5035)	
☐ VOCs - HI Level (5035)	
☐ SVOCs (8270)	
☐ PAHs (8270)	
☐ (others, write in)	

14. ANALYSIS OBJECTIVE: (check a box)
☒ Waste Characterization
☐ Drinking H_2O Standards (applies to DW only)
☐ Treatment Standards
☐ Others (contact Lab supervisors first)

15. DETECTION LIMIT REQUIREMENTS: (specify if known and contact lab)

16. SUPPLEMENTAL REQUESTS

Initials
Date

17. LAB REMARKS:

18. CHAIN OF CUSTODY:

	Signature(s)	Name(s) / Title (s)	Inclusive Dates of Custody
a.	R. Aragon	R. Aragon / Sr. HSE	8/10/05 to 8/11/05
b.	D Chard	Dinesh Chand	8/11/05 to
c.			to
d.			to

COC

DTSC 1116H (REV 6/00)

Make Photocopies for your File

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State of California
California Environmental Protection Agency

Department of Toxic Substances Control
Hazardous Materials Laboratories

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

1. Authorization Number: HMU5777

HML No. To

2. Page 2 of 2

3. REQUESTOR: Robert Aragon

4. Phone (510) 540-3904

5. ADDRESS (To Receive Results)
700 Heinz Avenue
Berkeley, California 94710

6. FAX (510) 540-3891

7. TAT Level: (check one)
[ ] *1 [X] 2 [ ] 3 [ ] 4
* Unit Chief's Signature

8. DATE SAMPLED: AUGUST 10, 2005

9. Codes (fill in all applicable codes)

a. Office	02
b. INDEX	4040
c. PCA	36211
d. MPC	
e. SITE	
f. County	01

10. ACTIVITY: [ ] SCD [ ] SRPD [ ] CIB [ ] SMB [ ] FPB [ ] SPPT [X] Others

11. SAMPLING LOCATION
a. EPA ID No.: CAR000006826 2
b. Site: Metro Valley Cleaners
c. Address: 224 Rickenbacker Circle, Livermore 94550
(Number / Street / City / ZIP)

12. SAMPLES:

a. ID	b. Collector's No.	c. HML No.	d. Type (Sample)	e. Type (Container)	f. Size	g. Field Information
A	MVC07		liquid	Glass	16-oz	Dry Cleaning Solvent
B	MVC08		liquid	Glass	16-oz	Cyclopentasiloxane (541-02-6)
C	MVC09		liquid	Glass	16-oz	Dry Cleaning Waste
D						
E						
F						

13. ANALYSIS REQUESTED: (X desired analysis and enter I.Ds from 12.a.)

INORGANIC ANALYSIS	Sample(s) ID
[X] pH	A-C
[ ] Metals Scan (6010)	
[ ] Metal(s) Specific	
[ ] WET	
[ ] Cyanides	
[ ] (others, write in)	
[ ] (others, write in)	

TCLP Analysis (only if necessary) / (do TCLP regardless)	
[ ] Metals	
[ ] Mercury	
[ ] Volatiles	
[ ] Semivolatiles	
[ ] (others, write in)	

ORGANIC ANALYSIS	Sample(s) ID
[ ] CL-Pesticides (8081)	
[ ] OP-Pesticides (8141)	
[ ] PCBs (8082)	
[ ] G R O (8015B)	
[ ] D R O / Motor Oil / Both (circle one)	
[ ] n-Hexane Extractables (1664)	
[X] Flash Point (1020)	A-C
[ ] VOCs Including BTEX (8260)	
[ ] VOCs - LO Level (5035)	
[ ] VOCs - HI Level (5035)	
[ ] SVOCs (8270)	
[ ] PAHs (8270)	
[ ]	
[ ] (others, write in)	

14. ANALYSIS OBJECTIVE: (check a box)
[X] Waste Characterization
[ ] Drinking H_2O Standards (applies to DW only)
[ ] Treatment Standards
[ ] Others (contact Lab supervisors first)

15. DETECTION LIMIT REQUIREMENTS: (specify if known and contact lab)

16. SUPPLEMENTAL REQUESTS

Initials
Date

17. LAB REMARKS:

18. CHAIN OF CUSTODY:

	Signature(s)	Name(s) / Title (s)	Inclusive Dates of Custody
a.	R. Aragon	R. Aragon / Sr. HSE	8/10/05 to 8/11/05
b.	D Chand	Dinesh Chand C-1	8/11/05 to
c.			to
d.			to

COC

ATTACHMENT B

Analytical Reports from HML

Ignitability Results dated August 22, 2005 (1 page)

pH Results dated August 23, 2005 (2 pages)

California Department of Toxic Substances Control
Hazardous Materials Laboratory
700 Heinz Avenue Suite 100; Berkeley, CA 94710
Phone : (510) 540-3003

HML # : AP 00174
to: AP 00182
Auth. No.: HMV 5777

LABORATORY REPORT FOR ... IGNITIBILITY

Requestor's Name: Robert Aragon
Requestor's Addre: 700 Heinz Avenue
Berkeley, California 94710
Sampling Location: Metro Valley Cleaners
224 Rickenbacker Circle
Livermore, CA 94550

Date Collected: 08/10/05
Date Received by Lab.: 08/11/05
Date Analyzed: 08/12/05

Analytical Method: EPA 1020B

Procedure: Two milliliter of sample is introduced by means of syringe through a leak proof entry port into the tightly closed Setaflash Rapid Tester for the determination of ignitibility (flash points) of organic liquids.

HML Number	Collector's Number	Matrix	RESULTS Degree Fahrenheit
AP 00174	MVC 01	Liquid	>140
AP 00175	MVC 02	Liquid	>140
AP 00176	MVC 03	Liquid	>140
AP 00177	MVC 04	Liquid	>140
AP 00178	MVC 05	Liquid	>140
AP 00179	MVC 06	Liquid	>140
AP 00180	MVC 07	Liquid	>140
AP 00181	MVC 08	Liquid	>140
AP 00182	MVC 09	Liquid	>140

NA = Not analyzed due to solid matrix.

Associated QC:

Replicate analysis performed on HML sample no.: AP 00174

Ignitibility			RPD
Replicate #1	Replicate #2	Mean	
>140	>140	>140	0.00

Reference Standard: p-Xylene [Expected Value 78 +/- 1]

Replicate #1	Replicate #2	Mean	RPD
78.0	78.0	78.0	0.00

RPD = relative % difference = absolute value of (repl. #1 - repl. #2)/mean x 100%

Analyst: Kuo-In Chang — Kuo-In Chang — 8-22-05

Supervisor: Jamail Garcha — Signature — 8/22/05 Date

ja/qpro/1020/AP00174.qpw

California Department of Toxic Substances Control
HAZARDOUS MATERIALS LABORATORY
700 Heinz Avenue, Suite 100, CA 94710, Ph.: (510) 540-3003

HML No.: AP00174
To: AP00182
Auth. No.: HMV5777

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of: 2

Laboratory Analysis Report
For pH

Collector's Name: Robert Aragon
Collector's Address: 700 Heinz Avenue
Berkeley, CA 94710

Site or Location: Metro Valley Cleaners
Site Address: 224 Rickenbacker Circle
Livermore 94550

Date Collected: 8/10/2005
Date Received: 8/11/2005
Date Extracted: 8/15/2005
Date Analyzed: 8/15/2005

Analytical Procedure: EPA 9040B (for Liquid) and/or 9045C (for Solid)
pH was determined using Accumet pH meter 925 (Fisher Scientific)
calibrated with buffers 1.00, 4.00, 7.00, and 13.0.

HML Number	Collector's Sample No.	Sample Type	pH
AP00174	MVC01	Liquid	5.48
AP00175	MVC02	Liquid	6.54
AP00176	MVC03	Liquid	6.80
AP00177	MVC04	Liquid	8.27
AP00178	MVC05	Liquid	9.94
AP00179	MVC06	Liquid	7.87
AP00180	MVC07	Liquid	5.64
AP00181	MVC08	Liquid	4.30
AP00182	MVC09	Liquid	5.09

8/18/05
Kashyap Thakore — Date
Chemist

JS Garcha 8/23/05
Jamail Garcha — Date
Supervisor

FH 8/23/05

California Department of Toxic Substances Control
HAZARDOUS MATERIALS LABORATORY
700 Heinz Avenue, Suite 100, CA 94710, Ph.: (510) 540-3003

HML No.: AP00174
To: AP00182
Auth. No.: HMV5777

Page: 2
of: 2

Laboratory Quality Control Report
For pH

Collector's Name: Robert Aragon
Collector's Address: 700 Heinz Avenue
Berkeley, CA 94710

Site or Location: Metro Valley Cleaners
Site Address: 224 Rickenbacker Circle
Livermore 94550

Date Collected: 8/10/2005
Date Received: 8/11/2005
Date Extracted: 8/15/2005
Date Analyzed: 8/15/2005

I. Calibration Standard File

Source	Lot No.	Expiration Date	Buffer Type	Buffer	mv Reading	Slope (%)
EMSci	41532742	Ampule	Liquid	1.00	351.90	-
EMSci	3340	Nov-05	Liquid	4.00	181.30	0.97900
EMSci	3340	Dec-05	Liquid	7.00	8.60	0.98980
EMSci	70228367	Ampule	Liquid	13.00	-331.50	0.97596

II. Laboratory Control Sample

Analyte	Source	Lot No.	Expir'n. Date	Result		Absolute Difference
pH Buffer				Expctd	Observed	
8.00	VWR	3272	Sept 05	8.00	7.95	0.05

III. Laboratory Duplicate Sample Results

HML No.	Sample Type	Sample Result	Dupl. Result	Absolute Difference		
AP00178	Liquid	9.94	9.94	0		

Comments:

8/18/05
Kashyap Thakore Date
Chemist

JS Garcha 8/23/05
Jarnail Garcha Date
Supervisor