

Environmental Health

September 18, 2005

Alameda County Department of Environmental Health 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Attention: Ms. Susan Hugo

RE: Limited Closure Plan Report Aqua Chlor 15885 Altamont Pass Road, Tracy, California (CCI Project No. 12176-1)

Dear Ms. Hugo:

On behalf of Aqua Chlor, Compliance & Closure, Inc. (CCI) has prepared this Limited Closure Plan report to document activities related to discontinue the use of chorine at the Aqua Chlor facility, located at 15885 Altamont Pass Road, Tracy, Alameda County, California (Figure 1).

Background

Since 1985, Aqua Chlor has occupied a10-acre site located at 15885 Altamont Pass Road in Tracy, Alameda County, California. Aqua Chlor, which employs approximately 20 people at its Altamont facility, is a residential swimming pool service company and services approximately 2300 swimming pools from their Altamont Pass facility.

A majority of the 10-acre site is vacant land. The area occupied by Aqua Chlor consists of two, single-story, metal warehouses, surrounded by a large gravel and dirt parking area. One of the metal structures is used as a warehouse and the other is a combination of an office, a small warehouse used to store pool chemicals, and an auto shop (Figure 2). In addition, there is an area that was previously used to fill 20-pound field service cylinders with chlorine for use in Aqua Chlor's business. Several yards south of the structures is a truck trailer, which is used for additional storage. Adjacent to the trailer are approximately 6 to 12 pallets of prepackaged pool chemicals.

Until March, 2005, the company used chlorine to disinfect and maintain swimming pools. Aqua Chlor now uses sodium hypochlorite to perform those functions.

Prior to 2005, bulk chlorine was brought to the site in one-ton gas cylinders provided by Pioneer Chemical of Tracy, California. A total of 7 to 8 such cylinders were stored at the subject site at any given time. The chlorine gas was then transferred to 20-pound cylinders for use in the company's customer service vehicles. The bulk chlorine was stored on the south side of the office warehouse building (Figure 3).

In the 1990s, Aqua Chlor used two small freezers filled with 85 gallons of an antifreeze solution (3 parts water to one part antifreeze) to chill the small cylinders prior to filling them with chlorine. The use of antifreeze to cool the small cylinders was terminated in late 2000 because antifreeze was dripping on the ground in front of the filling station. At the request of Alameda County, Aqua Chlor placed adsorbent mats under the two freezers as secondary containment and, additionally, discontinued the use of the water/antifreeze solution. Aqua Chlor has reported that the two freezers were later appropriately disposed. Since the cylinders had to be chilled by some method prior to filling them with chlorine gas, Aqua Chlor began placing the 20-pound cylinders in ordinary freezers.

The chlorine gas was transferred from the one ton cylinders to the small, chilled cylinders by copper tubing in a closed system. The amount of gas transferred was measured by a platform scale. The small cylinders were considered full when each weighed 16 pounds. Any chlorine gas trapped between the fill valve and filling tube was returned to a 2,000-gallon sodium hydroxide tank via PVC piping and a viton recovery tube. The fill system was completely closed and no chlorine gas reportedly escaped during the filling operation.

On or about October 13, 2000, a broken pipe related to the 2,000-gallon holding tank caused fourteen hundred gallons of a 7% sodium hydroxide solution (caustic soda) to spill onto the gravel and dirt parking lot in front of the existing warehouse. According to Aqua Chlor, approximately 95 tons of soil was removed from the site. The soil was excavated to approximately 2 feet below the ground surface (bgs). Prior to excavating, two soil samples were collected, one from the surface and one from 6-inches below the surface. The laboratory reported the surface sample to contain 11,000 ppm sodium, with a pH of 11+, and the 6-inch sample was reported to contain 2,000 ppm sodium with a pH of 8+.

As previously stated, in early 2005, Aqua Chlor discontinued the use of chlorine and began using sodium hypochlorite. In February, 2005, all the chlorine gas in the one ton cylinders was transferred to the 20-pound service cylinders, and on February 14, 2005, all the one-ton cylinders were returned to Pioneer Chemical in Tracy, California. All the

chlorine gas in the 20-pound cylinders was expended by the end of March 2005.

On May 23, 2005, CCI prepared a limited closure plan to discontinue the use of chlorine and sodium hydroxide at the Aqua Chlor site. In response to questions from Alameda County Health Care Services, CCI submitted additional information to the County on June 16, 2005. The County approved the work plan on July 19, 2005, conditioned upon certain clarifications, which CCI submitted to the County on August 4, 2005.

Closure Activities

The following items were addressed during the closure activities at the Aqua Chlor site. The equipment used to transfer chlorine from the bulk storage cylinders to the 20-pound field service cylinders included two freezers, a 6 foot piece of ¼-inch diameter copper fill tubing for the chlorine gas transfer, approximately 85 to 100 field service cylinders, approximately 30 feet of 2-inch diameter PVC piping with plastic control valves, and the 2,000-gallon sodium hydroxide storage tank. These items were addressed in the following manner:

- 1. Aqua Chlor ceased using the antifreeze in the freezers. The two freezers were emptied and rinsed in January 2001. American Valley Waste Oil, Inc. removed 90 gallons of antifreeze on January 8, 2001. Aqua Chlor gave the empty freezers to a scrap metal dealer and the contaminated soil was removed by the property owner (or someone working on behalf of the property owner);
- 2. There were approximately 85 to 100 20-pound service cylinders stored at the site. These service cylinders did not contain any chorine gas and were under a negative pressure. The company transferred these cylinders to its Sacramento facility;
- 3. Approximately 30 feet of 2" PVC piping was used in the chlorine gas recovery system. Due to the small quantity, CCI proposed that the PVC piping be cut into approximately 3-foot sections and placed in a 55-gallon drum. In addition, a 6-foot piece of copper tubing used to transfer the chlorine gas to the 20-pound cylinders was also placed into the drum for disposal. The drum was then taken by Environix to Superlink, Inc., located in Oakland, California for recycling. A copy of the uniform bill of lading is attached;
- 4. On September 15, 2005 the 2,000-gallon sodium hydroxide tank was pumped out and pressure washed by Onyx Environmental Services (Onyx). Onyx performed the tank cleaning in level C protection (Tyvek suite, gloves and full face respirator). Approximately 1,004 gallons of 10% (or less) sodium hydroxide

solution and rinse water were vacuumed out of the tank and placed into a truck for transport and disposal at US Filter located in Southern California. After the tank was vacuumed and pressure washed, the tank was inspected and found to be clean. The pH of the tank rinse water was measured at 9. A copy of the manifest is attached in Appendix B. The 2,000-gallon tank will remain on site and Aqua Chlor intends to use the tank as a rinse water holding tank in its future operations. Ms. Sukla De, representing the Alameda county Health Services Agency observed the tank cleaning activities.

Collection of soil samples

On August 12, 2005, CCI collected a total of 6 soil samples (S-1, S-1A, S-2, S-3, S-4 and S-5) from the area where the small services cylinders were filled (Figure 3), at the former location of the circulation pump and at the base of the sodium hydroxide tank. A background soil sample (S-6) was collected several yards south of investigated area.

In general, soil samples were collected from depths of approximately 15 to 22 inches at the various locations by digging a hole with a shovel and posthole digger, and collecting samples using a slide hammer fitted with 2 x 6 inch diameter brass liner. All six soil samples were collected in very dark gray (2.5Y, 3/1) clay, which was found to be very stiff, moist, with medium plasticity. Upon retrieval, the sampler was disassembled into its component parts. The brass liner was removed, then sealed with Teflon sheets, capped with plastic caps, labeled, logged on a chain-of-custody form and stored in a chilled chest containing ice for preservation in the field and during transport to the analytical laboratory. The samples were transported to Severn Trent Laboratories, Inc. (STL), located in Pleasanton, California. All soil samples were analyzed for chloride using EPA Test Method 9056 by Ion Chromatograph and pH using EPA Test Method 9040B. Selected soil samples from the fill station area were also analyzed for antifreeze (ethylene glycol) using EPA Test Method 8015B.

Soil Sample Results

The laboratory reported the pH values for the six samples ranged from a low of 8.1 in sample S-3 to a high of 9.7 in sample S-1. The background sample (S-6) was reported to have a pH of 9.0. The chloride concentrations were reported to range from 1100 milligrams per kilogram (mg/kg) at sample locations S-1 and S-5 to 1800 mg/kg at sample location S-1A. The background sample (S-6) was reported to contain chloride at 920 mg/kg. The laboratory reported one of four samples tested positive for ethylene glycol. Sample S-2 was reported to contain 1700 mg/kg ethylene glycol. Samples S-1 and S-1A, as well as background sample S-6, were reported to be free of detectable

ethylene glycol. The laboratory data is summarized in Table 1. A copy of the laboratory report is attached in Appendix A.

Conclusion

The subject site is relatively flat, is 10 acres in size, and is surrounded by sharply rising hills to the south, west and north. In conversations with Aqua Chlor personnel, rain water ponds on the surface over a large portion of the site during the rainy season. The ponding of the water is due to the dense and very stiff underling clay. After the water evaporates, a white precipitate is left behind. This material is most likely calcium or sodium chloride. The surrounding hills are the source for the background chloride concentrations at the site. Based on this information, the pH values and chloride concentrations reported for the samples collected appear to be within background values for the site. While the chloride concentrations in the soil samples are slightly higher than the background sample, the samples are within an order of magnitude and are not significantly higher than background levels.

As previously stated, soil sample S-2 was reported to contain 1700 mg/kg ethylene glycol. The other two samples collected in front of the former freezer location were reported to be "non-detect". The concentration of ethylene glycol at sample location S-2 appears to be localized. The sample was also colleted within very dense clay, which is prevalent throughout the site, and therefore, should contain any migration. Based upon these factors, it is CCI's opinion the ethylene glycol at the site does not pose a threat to the environment; therefore, no further remediation activities are warranted.

If you have any questions or require additional information, please call our office at (925) 648-2008.

Sincerely,

Compliance & Closure, Inc.

Hang R. mul

Gary R. Mulkey, R.G. 5842

cc: Mr. John Wallace, Aqua Chlor-

TABLE 1

9/18/2005

Summary of Soil Sample Data Aqua Chlor - 15885 Altamont Pass Road, Tracy, CA

Sample Number	Date Sampled	Sample Depth (Inches)	pH (SU)	Chloride (mg/kg)	Ethlyene Glycol (mg/kg)	
S-1	8/12/2005	15 to 22	9.7	1100	<25	<u> </u>
S-1A	8/12/2005	22 to 28	8.8	1800	<25	
S-2	8/12/2005	15 to 22	9.5	1200	1700	
S-3	8/12/2005	15 to 22	8.1	1500	N/A	
S-4	8/12/2005	15 to 22	8.7	1700	N/A	
S-5	8/12/2005	15 to 22	8.9	1100	N/A	
S-6	8/12/2005	15 to 22	9.0	920	<25	

mg/kg

Milligrams per kilogram

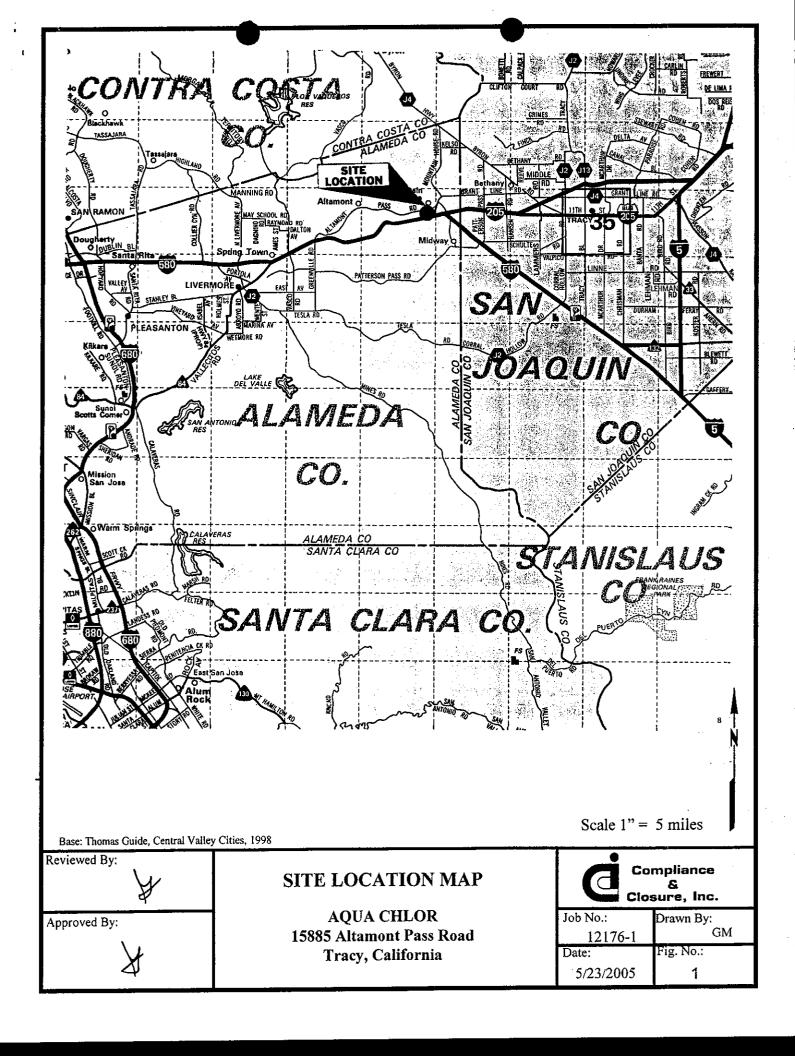
N/A

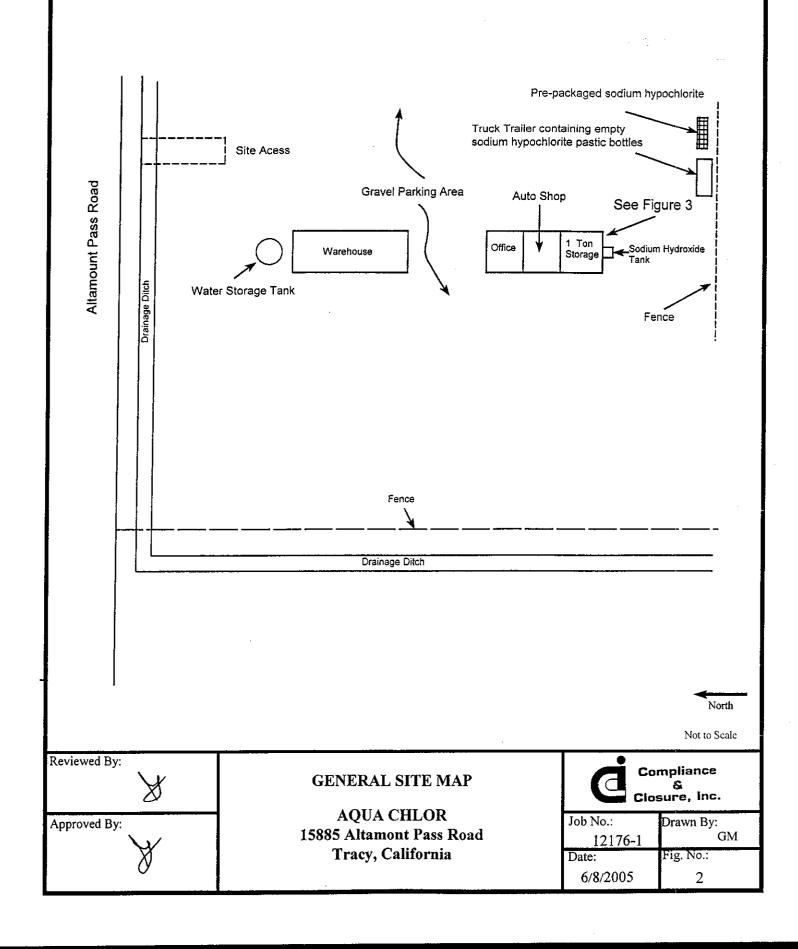
Not Analyzed

<

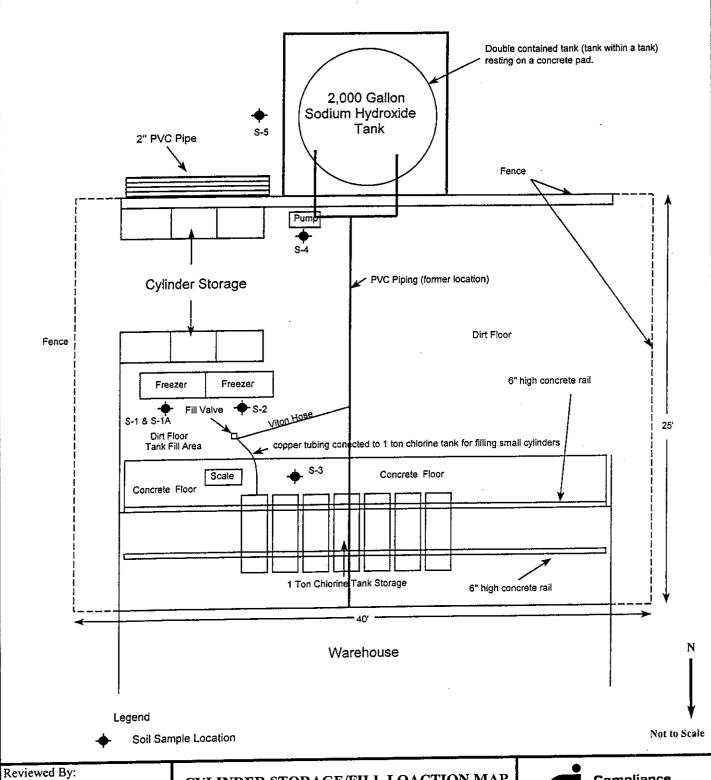
Below laboratory detection limit











Approved By:

CYLINDER STORAGE/FILL LOACTION MAP

Aqua Chlor 15885 Altamont Pass Road Tracy, California



Compliance Closure, Inc.

Job No.: Drawn By: GM 12176-1 Fig. No.: Date: 9/18/2005 3

APPENDIX A

Laboratory Report and Chain of Custody Form



Compliance and Closure, Inc.

September 01, 2005

4115 Blackhawk Plaza Circle Suite 100 Danville, CA 94506

Attn.:

Gary Mulkey

Project#: 12176-1

10476 4

Project:

Aqua Chlor

Site:

Aqua Chlor, Tracy, CA

Dear Mr. Mulkey,

Attached is our report for your samples received on 08/12/2005 12:18

This report has been reviewed and approved for release. Reproduction of this report is permitted only in its entirety.

Please note that any unused portion of the samples will be discarded after 09/26/2005 unless you have requested otherwise.

We appreciate the opportunity to be of service to you. If you have any questions, please call me at (925) 484-1919.

You can also contact me via email. My email address is: ssidhu@stl-inc.com

minder Sodhy.

Sincerely,

Surinder Sidhu Project Manager



pН

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab#
S-1	08/12/2005 10:25	Soil	1
S-2	08/12/2005 10:30	Soil	2
S-1A	08/12/2005 10:35	Soil	3
S-3	08/12/2005 10:45	Soil	4
S-4	08/12/2005 10:55	Soil	5
S-5	08/12/2005 11:04	Soil	6
S-6	08/12/2005 11:11	Soil	7



рΗ

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9045C

Test(s):

9045C

Sample ID: S-1

Lab ID:

2005-08-0407 - 1

Sampled:

08/12/2005 10:25

Extracted:

8/16/2005 00:00

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	9.7	0.1	SU	1.00	08/16/2005	



pН

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9045C

Test(s):

9045C

Sample ID: S-2

Lab ID:

2005-08-0407 - 2

Sampled:

08/12/2005 10:30

Extracted:

8/16/2005 00:00

Matrix:

Soil

	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	8.8	0.1	SU	1.00	08/16/2005	



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Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9045C

Test(s):

9045C

Sample ID: S-1A

Lab ID:

2005-08-0407 - 3

Sampled:

08/12/2005 10:35

Extracted:

8/16/2005 00:00

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	9.5	0.1	SU	1.00	08/16/2005	



pН

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9045C

Test(s):

9045C

Sample ID: S-3

Lab ID:

2005-08-0407 - 4

Sampled:

08/12/2005 10:45

Extracted:

8/16/2005 00:00

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	8.1	0.1	SU	1.00	08/16/2005	



pН

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

Matrix:

9045C

Sample ID: S-4

Sampled:

08/12/2005 10:55

Soil

Test(s):

9045C

Lab ID:

2005-08-0407 - 5

Extracted:

8/16/2005 00:00

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
рН	8.7	0.1	su	1.00	08/16/2005	l



рH

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9045C

Test(s):

9045C

Lab ID:

2005-08-0407 - 6

Sampled:

Sample ID: S-5

08/12/2005 11:04

Extracted:

8/16/2005 00:00

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
рН	8.9	0.1	su	1.00		



pН

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

Matrix:

9045C

Sample ID: S-6

Sampled:

08/12/2005 11:11 Soil

Test(s):

9045C

Lab ID:

2005-08-0407 - 7

Extracted:

8/16/2005 00:00

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
pH	9.0	0.1	SU	1.00	08/16/2005	



рΗ

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Batch QC Report

Prep(s): 9040B/150.1

MB: 2005/08/16-01.22-001

Method Blank

Water

Test(s): 9040B/150.1

QC Batch # 2005/08/16-01.22

Date Extracted: 08/16/2005

Compound	Conc.	RL	Unit	Analyzed	Flag
pH	7.09	0.1	SU	08/16/2005	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Samples Reported

Sample Name	Date Sampled	Matrix	Lab#
S-1	08/12/2005 10:25	Soil	1
S-2	08/12/2005 10:30	Soil	2
S-1A	08/12/2005 10:35	Soil	3
S-3	08/12/2005 10:45	Soil	4
S-4	08/12/2005 10:55	Soil	5
S-5	08/12/2005 11:04	Soil	6
S-6	08/12/2005 11:11	Soil	7



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s):

9056

Lab ID:

2005-08-0407 - 1

Sampled:

Sample ID: S-1

08/12/2005 10:25

Extracted:

8/19/2005 08:43

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1100	500	mg/Kg	50.00	08/19/2005 08:43	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s):

9056

Lab ID:

2005-08-0407 - 2

Sampled:

Sample ID: S-2

08/12/2005 10:30

Extracted:

8/19/2005 08:58

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1800	500	mg/Kg	50.00	08/19/2005 08:58	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Sample ID: S-1A

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s): Lab ID:

9056

2005-08-0407 - 3

Sampled:

08/12/2005 10:35

Extracted:

8/19/2005 09:14

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1200	500	mg/Kg	50.00	08/19/2005 09:14	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s):

9056

Sample ID: S-3

Lab ID:

2005-08-0407 - 4

Sampled:

08/12/2005 10:45

Extracted:

8/19/2005 09:29

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1500	500	mg/Kg	50.00	08/19/2005 09:29	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

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Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s):

9056

Sample ID: S-4

Lab ID:

2005-08-0407 - 5

Sampled:

08/12/2005 10:55

Extracted:

8/19/2005 09:45

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1700	500	mg/Kg	50.00	08/19/2005 09:45	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s):

9056

Sample ID: S-5

Lab ID:

2005-08-0407 - 6

Sampled:

08/12/2005 11:04

Extracted:

8/19/2005 10:00

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	1100	500	mg/Kg	50.00	08/19/2005 10:00	



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Prep(s):

9056

Test(s):

9056

Lab ID:

2005-08-0407 - 7

Sampled:

Sample ID: S-6

08/12/2005 11:11

Extracted:

8/19/2005 10:16

Matrix:

Soil

Compound	Conc.	RL	Unit	Dilution	Analyzed	Flag
Chloride	920	500	mg/Kg	50.00	08/19/2005 10:16	·



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Batch QC Report

Prep(s): 9056

Method Blank

Soil

Test(s): 9056

QC Batch # 2005/08/19-01.41

MB: 2005/08/19-01.41-001

Date Extracted: 08/19/2005 07:56

Communication	Cono	RL	Linit	Analyzad	Elog	1
Compound	Conc.	NL.	Unit	Analyzed	Flag	ł
Chloride	ND	10	mg/Kg	08/19/2005 07:56		l



Misc Anions by Ion Chromatograph

Compliance and Closure, Inc.

Attn.: Gary Mulkey

4115 Blackhawk Plaza Circle Suite 100

Danville, CA 94506

Phone: (925) 648-2008 Fax: (925) 648-2797

Project: 12176-1

Aqua Chlor

Received: 08/12/2005 12:18

Site: Aqua Chlor, Tracy, CA

Batch QC Report

Prep(s): 9056

Test(s): 9056

Laboratory Control Spike

Soil

QC Batch # 2005/08/19-01.41

LCS

2005/08/19-01.41-002

Extracted: 08/19/2005

Analyzed: 08/19/2005 08:12 Analyzed: 08/19/2005 08:27

LCSD 2005/08/19-01.41-003

Extracted: 08/19/2005

Ctrl.Limits % RPD Flags Exp.Conc. Recovery % Conc. mg/Kg Compound **RPD** LCS LCSD % LCSD LCS LCSD LCS Rec. 6 96.2 96.5 0.3 80-120 20 5.77 5.79 Chloride

STL Austin • 14046 Summit Drive, Austin, TX 78728 • Tel 512 244 0855 • Fax 512 244 0160 • www.string.com

ANALYTICAL REPORT

PROJECT NO. 2005-08-0407

2005-08-0407

Lot #: 15H160230

Surinder Sidhu

STL San Francisco 1220 Quarry Lane Pleasanton, CA 94566

SEVERN TRENT LABORATORIES, INC.

Neal J. Salcher

Project Manager

August 29, 2005

American Council of Independent Laboratories International Association of Environmental Testing Laboratories

Case Narrative

STL LOT NUMBER: 15H160230

This report contains the analytical results for the four samples received under chain of custody by Severn Trent Laboratories (STL) on August 16, 2005. These samples are associated with your 2005-08-0407 project.

All samples were received in good condition and within temperature requirements

All applicable quality control procedures met method-specified acceptance criteria except where noted in the case narrative or flagged on the result pages.

This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions, please feel free to call me at 512-244-0855.

EXECUTIVE SUMMARY - Detection Highlights

15H160230

		REPORTING		ANALYTICAL
PARAMETER	RESULT	LIMIT	<u>units</u>	METHOD
				or plant
S-2 08/12/05 10:30 002				
Ethylene glycol	1700	500	mg/kg	SW846 8015B

ANALYTICAL METHODS SUMMARY

15H160230

PARAMETER ANALYTICAL METHOD

Nonhalogenated Organics Using GC/FID SW646 B015B

References:

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

15H160230

WO # 5	AMPLE#	CLIENT SAMPLE ID	SAMPLED SAMP DATE TIME
HHLCA	001	S-1	08/12/05 10:25
HHLCG	002	S-2	08/12/05 10/30
HHLCK	003	S-1A	08/12/05 10:35
HHLCT	004	S-6	08/12/05 11:11

NOTE(S):

- · The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pll. potonty pressure, reactivity, redox potential, specific gravity, spot tests, soliditity, temperature, viscosity, and weight.

QC DATA ASSOCIATION SUMMARY

I5H160230

Sample Preparation and Analysis Control Numbers

SAMPLE#	MATRIX	ANALYTICAL METHOD	LEACH BATCH #	PREP BATCH # MS RUN#
001	SOLID	SW846 8015B		5235217 5235129
002	SOLID	SW846 8015B		5235217 5235129
003	SOLID	SW846 8015B		5235217 5235129
004	SOLID	SW846 8015B		5235217 5235129

STL SAN FRANCISCO

Client Sample ID: S-1

GC Semivolatiles

Lot-Sample #: 1				Matrix SOLID
Date Sampled: 0				MS Ruo # 5235129
Prep Date: 0	8/23/05	Analysis Date:	08/26/05	
Prep Batch #: 5	235217	Analysis Time:	14:54	
Dilution Factor: 1				
% Moisture:	1	Method	SW846 8015B	
			REPORTING	
PARAMETER		RESULT	LIMIT	UNITS
Ethylene glycol		ND	25	mg/ x g
		•	RECOVERY	

76

 $n \cdot Butanol$

STL SAN FRANCISCO

Client Sample ID: S-2

GC Semivolatiles

Lot-Sample #:			Control of the Contro	27 PA (1986 193	rix	10.1	15
Date Sampled:	08/12/05 10:30	Date Received:	08/16/05	MS	Run #	: 62	235129
Prep Date:	08/23/05	Analysis Date	08/26/05	:1			
Prep Batch #:	5235217	Analysis Time	15:25				
Dilution Factor:							
% Moisture:		Method	SW846 8015B				
			REPORTING				
PARAMETER		RESULT	LIMIT U	water the south the contract of the same o	managaranaj	."	
Ethylene glycol		1700	500 m	g/kg			
•					tite and the second		
		PERCENT	RECOVERY			:	
SURROGATE		RECOVERY	LIMITS			11.4	
n-Butanol		87	(58 - 121)	H 12	4.74		
**				4			

STI. SAN FRANCISCO

Client Sample ID: S-1A

GC Semivolatiles

DOL DOMPRO Horses Total	Work Order #:	4.4	Matrix SOLID
Date Sampled: 08/12/05 10:35	Date Received:	08/16/05	MS Run # 5235129
Prep Date: 08/23/05	Analysis Date:	08/26/05	
Prep Batch #: 5235217	Analysis Time:	15:55	
Dilution Factor: 1			
* Moisture:	Method	SW846 B015B	
	· ·	REPORTING	
PARAMETER	RESULT	A PARTICIPATION OF THE PARTICI	PITS
Ethylene glycol	ND	25 mc	i/kg
	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	RECOVERY	
	PERCENT		
SURROGATE	RECOVERY	LIMITS	F
n-Butanol	81	(58 - 121)	

STL SAN FRANCISCO

Client Sample ID: S-6

GC Semivolatiles

Date Sample #: I5H160230-00 Date Sampled: 08/12/05 11 Prep Date: 08/23/05 Prep Batch #: 5235217	Analysis Time	08/16/05 08/26/05	MS Run # 5235129
Dilution Factor: 1 % Moisture:	Method	SW846 8015B	
PARAMETER Ethylene glycol	RESULT ND	manufacture in an annual manual manua	rts /kg
SURROGATE n-Butanol	PERCENT RECOVERY 77	RECOVERY LIMITS (58 - 121)	

METHOD BLANK REPORT

GC Semivolatiles

Client Lot #...: I5H160230

MB Lot-Sample #: I5H230000-217

Work Order # ... HH25PlAA

Prep Date....: 08/23/05

Analysis Time..: 20:22

Analysis Date..: 08/23/05

Dilution Factor: 1

Prep Batch #...: 5235217

REPORTING LIMIT

PARAMETER

SW846 8015B

Ethylene glycol

RESULT ND

SURROGATE n-Butanol PERCENT RECOVERY RECOVERY LIMITS

NOTE(S):

Calculations are performed before founding to avoid round-off errors to calculated results.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #...: I5H160230 Work Order #...: HH25F1AC Matrix.....: SOLID

TCS Lot-Sample#: I5H230000-217

Prep Date....: 08/23/05 Analysis Date..: 08/23/05 Prep Batch #...: 5235217 Analysis Time..: 17:20

Dilution Factor: 1

PERCENT RECOVERY

PARAMETER RECOVERY LIMITS METHOD
Ethylene glycol 112 (81 - 120) SW846 8015B

 SURROGATE
 PERCENT
 RECOVERY

 n-Butanol
 109
 (75 - 126)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE DATA REPORT

GC Semivolatiles

Client Lot #...: I5H160230 Work Order #... #H25P1AC Matrix...... SOLID

LCS Lot-Sample#: I5H230000-217

Prep Date....: 08/23/05 Analysis Date..: 08/23/05
Prep Batch #...: 5235217 Analysis Time..: 17:20

Dilution Factor: 1

SPIKE MEASURED PERCENT

PARAMETER AMOUNT UNITS RECOVERY METHOD

Ethylene glycol 400 447 mg/kg 112 SW846 8015B

SURROGATE RECOVERY
n-Butanol RECOVERY LIMITS
(75 - 126)

NOTE (S):

Calculations are performed before rounding to avoid round-off errors in calculated results

Bold point denotes control parameters

MATRIX SPIKE SAMPLE EVALUATION REPORT

GC Semivolatiles

Client Lot #: ISI	1160230 Work	Order #	HHLCAIAC	-MS Ma	trix : SOLID	
MS Lot-Sample #: I5	H160230-001		HHLCALAD	-MSD		
Date Sampled: 08/	12/05 10:25 Date	Received:	08/16/05	MS	Run #: 5235129	3
Prep Date: 08/	23/05 Anal;	ysis Date:	08/23/05			
Prep Batch #: 523	35217 Anal	ysis Time. :	17:50			
Dilution Factor: 1	-t Mo:	isture:	; °	- 44 		
	PERCENT	RECOVERY	ŧ.,	RPD	1. "如何有效的"。	
PARAMETER	RECOVERY	LIMITS	RPD	LIMITS	METHOD	
Ethylene glycol	113	(81 - 120)			SW846 8015B	
. 2 -	110	(81 - 120)	3.0	(0-30)	SW846 8015B	

		PERCENT		RECOVERY		
SURROGATE		RECOVERY		LIMITS		
n-Butanol		116	•	(58 - 12	1)	
		122 *		(58 - 12	i)	
			7-1			

NOTE(S):

Bold print denotes control parameters

Calculations are performed before counding to avoid mund-off errors in calculated results.

[·] Surrogue recovery is outside stated control limits

MATRIX SPIKE SAMPLE DATA REPORT

GC Semivolatiles

Client Lot #: I5	H160230 Work O	rder #: HHLCA1A	C-MS Matrix	SOLID
MS Lot-Sample #: I5	H160230-001	HHLCA17		
Date Sampled: 08	/12/05 10:25 Date R	eceived: 08/16/0	15 MS Run #	5235129
Prep Date: 08	/23/05 Analys	is Date: 08/23/0	15	
Prep Batch #: 52	35217 Analys	is Time: 17:50		
Dilution Factor: 1	% Mois	ture		entry of the second of the sec
	SAMPLE SPIK	e measrd	PERCNT	
PARAMETER	THA THUOMA	AMOUNT UNITS	RECVRY RPD	METHOD
Ethylene glycol	ND 400	454 mg/kg	113	SW846 8015B
	ND 400	440 mg/kg	110 3.0	SW846 B015B
SURROGATE n-Butanol		PERCENT RECOVERY 116 122 *	RECOVERY LIMITS (58 - 121) (58 - 121)	

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results:

Bull prad denotes control parameters

^{*} Surrogate recovery is outside stated control limits.

Report Attachment

The results included in this report have been reviewed for compliance with the laboratory QA/QC plan and meet all requirements of NELAC. All data have been found to be compliant with laboratory protocol except as otherwise noted.

Note that if this report contains tests performed for the following methods, the associated method deviations are applicable.

EPA 410.4, COD: Laboratory uses different analytical wavelength as specified by instrument manufacturer.

EPA 340.2, Fluoride: Preliminary Bellack distillation not performed

EPA 624: The laboratory uses a different desorb time and purge volume than stated in the method.

EPA 8151A: Laboratory utilizes alternate extraction solvent.

lowa OA1. Benzene, toluene, ethylbenzene and xylenes (BTEX) are not analyzed along with the Gasoline Range Organics if client does not require BTEX.

EPA TO-12: Samples not analyzed in duplicate.

EPA TO-14A and TO-15: Zero humidified nitrogen is used in place of air for method blanks.

TRRP Reporting Requirements

If this package contains reports requiring TRRP (Texas Risk Reduction Program) reporting criteria, the following information applies.

The REPORTING LIMIT is equivalent to the TRRP acronym MQL (method quantitation limit).

The MDL is equivalent to the TRRP acronym SQL (sample quantitation limit).

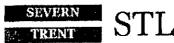
SEVERN STL

CHAIN-OF-CUSTODY ADDENDUM

	Lot No. 25H160230
RECEIVED BY: <u>B4</u>	COC NUMBER:
DATE/TIME RECEIVED: 8 /16/25 0832	QUOTEPROFILE: 69420
JNPACKED DATE/TIME: 1/11/05 0930	
CLIENT/PROJECT: 574 Sep Francis	SAMPLES LOGGED IN: LOG-IN REVIEWED
Number of Shipping Containers Received with Chain of Custody	CC SCT
	SEE SECTIONS 1.0, 2.0, & 6.0
1.0 CONTAINERS EXAMINED UPON RECEIPT:	
Container Sealed: YES NO	Custody Seal Signed/Dated:
Custody Seal Present: YES NO	Containers checked for radioactivity: TYES TNO TNA
If seal not intact or Geiger counter reading >0.5 mR/hr, lis	그는 사진 회의 이 사용하다 하다 생생님은 발표되는 경험에 생활하다 하다 그 사람들이 생활하는 사용이 되었다. 그 사람들이 되었다.
2.0 VOC CANISTERS EXAMINED UPON RECEIPT	
	Samples Received Match Chain: YES NO
Canister Valves Capped: YES NO	
Valve Cap Tightened Properly: YES NO	See Additional Comments (Section 5.0 and / or 7.0) YES NO
Packing Material Used: (circle)	Chain-of-Custody form properly maintained:
None / Absorbent / Paper / Bubble Wrap	Can Size: 6L 15L Other
3.0 SAMPLE TEMPERATURE UPON RECEIPT BY:	: B IR THERMOMETER #: P 5
Temperature of the container(s):	man and the second of the seco
Circle selection: TB = Temp. Blank and/or SC = Sample C	Container [acceptable tolerance 4°C ± 2°; (NC, W: 1-4.4°C)] TB FB FB FB FB FB FB FB
	sc sc sc sc
If temperature is outside acceptable tolerance, Project Mar	and the control of th
Samples received do not require cooling	OK to analyze samples: YES NO
PRESERVATION OF SAMPLES REQUIRED: ☑NA	
Base samples are>pH 12: YES NO	Acid preserved are <ph 2:="" no<="" td="" yes=""></ph>
Cyanide samples checked	Sulfide samples appear to be preserved with zine acctate: TYES TINO
for sulfides: YES	to be preserved with zine accente: YES NO
Samples checked for chloring per specification (N.C.)	Free chlorine present: YES NO
If sample preservation is outside acceptable tolerance, Pro	oject Manager was notified (PM)
Date: Time:	see pH adjustment form
VOLATILE SAMPLES FILLED COMPLETELY, IF	NOT, LIST ID AND HEADSPACE OF YOA'S CONTAINING
BUBBLES EXCEEDING 6MM IN DIAMETER: Sample ID mm Headspace	Sample ID mm Headspace
Sample ID mm Headspace	- The state of the

						Page 2 of 2
			: :			
4.0 CONDITION OF BOTTLES/CO	ONTAINERS	3	VERIFIED	ı вү: <u>И</u>		
Samples received match COC:	E	YES NO	Botiles rece	ived intact	L eg	ZYES ∏'N
See additional discrepancies/comment	s section:	YES NO	Samples rec	eived fror	n USDA rest	
Chain-of-Custody form properly main	tained: 🕠	YES NO	VOA trip b)			□YES □NO □N
5.0 ADDITIONAL DISCREPANCE	IES		teropomenumentinairyoss, _{sees} .			The transfer of the second
Appears on COC			Appears on	ı Label	. 1	
Sample 1D	Date/Time	Sa	mple ID		Date/Time	Comments
					707500000000000000000000000000000000000	
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			And the second s			
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Value					······································	
6.0 SHIPPING DOCUMENTATION Air/freight bill is available and attache Hand-delivered Carrier:		□ÝES □ Þ	O Air bill t	Date:		Time:
7.0 OTHER COMMENTS:		was a second sec				
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		-				
CORRECTIVE ACTION:	, , , , , , , , , , , , , , , , , , ,					77830 (777538400) (35) Cr. U. graphonous and a second seco
Client's Name:		Informed verball			By:	e en
Client's Name:	i	Informed verball	y on:		Ву	
Sample(s) processed "as is" comments			<u></u>			
Samples(s) on hold until:			lfn	eleased, no	otify:	
REVIEW: Project Management:	Alge	PSALL	are the second and a second and a second as a second a		Date	8/30 05





Chain of Custody

Date Shipped: 8/15/2005

2005-08-0407 - 1

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From			To				
STL San Francisco (CL) 1220 Quarry Lane Pleasanton, CA 94566-4756			STL Austin 14046 Summit D Austin, TX 78	10 1 10 10 10 10 10 10 10 10 10 10 10 10			
Project Manager Prime (325) 484-1919	Surinder Sidhu Ext			244-0855 224-0160	Ext		
F <i>ax</i> Ernait	(925) 484-1096 ssidhu@stl-inc.com		E.A. TANDA ASSESSMENT OF TRANSPORT	le Gontrol 244-0855	Ext		
CL Submission #: CL PO #.	2005-08-0407		Project #. Project Name				
Client Sample ID		C).#	Sampled	Matrix			44-6
Analysis				Method		TAT	
S-1		1	8/12/2005 10:25:00AM	Soff			
Subcontract - Otl	ners REEZE *//*Ethylene Glycol	ship 8/15 to STL-/				/B D	ау
S-2		2	8/12/2005 10:30:00AM	Soil		day e Te	
Supcontract - Oth	ners REEZE 1/1 Ethylene Glycol	ship 8/15 to STL-/	Ausiin 10 DAYTAT Y			y D	ay
S-1A		3	8/12/2005 10:35:00AM	Soil			
Subcontract - Oth	ners FREEZE *//*Ethylene.Glycol.	**************************************				<i>5</i> / D	ay
S-6		7	8/12/2005 11:11 00AM	Soil			

" ANTIFREEZE "/ Elliylene Glycul ship &/15 to STL-Austin 10 DAY TAT "/

PLEASE INCLUDE QC WITH FAXED AND HARD-COPY RESULTS

Subcontract - Others

RELINOUIS ED BY	RELINQUISHED BY:	Ž	RELINQUISHED BY:	3
77 1380 1 me 8-15-05	Signature	Tiarre	Soprature	Time
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Finited Name B. A Jealers Time 6/16/05	Printed Name	Date	Printed Name	Date
Company STL	Gompany		Company	
		2		Dana 1 of 1

STL San Francisco

Sample Receipt Checklist Submission #:2005-

***				1002140725103			And the second s
	Checklist completed by:		\leq	7		DATE	8/12/05
6	Courier: F STL SF	Courier [Fedex	UPS	Other		Client C
-	Log-In Detai	ls			Yes	No	Comments
T	Custody seals intact on shipping con	amer/samp	oles	,			hannous data or (re-
ľ	Chain of custody present?					-	
	Chain of custody signed when relingu	ished and	receivec	17			Perked the entirecent tenation. Cherd signed off at time prior resistance.
	All samples checked when COC reline	quished				-	F. Commission of the Commissio
	Chain of custody agrees with sample	labels?	···				
,	Samples in proper container/bottle?				- Land	2	
,	Sample containers intact?			***************************************		1	
8	Sufficient sample volume for indicate	d test?				?	
9	All samples received within holding	/ m water to construct which			1,		
		Cooler T	emperali	ire Compl	iance Ch	eck	and the state of t
	Temperature Blank Reading	1		\$	ler Sam	ole Temp	- Control of the Cont
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	Reason for Elevated Temp	eralure		4		Sam	plos with Tomp > 6°C - Comments
	- Ice Melled Insufficient ice			***************************************	www.watenicip		
) Ice no	d rea	- Aller Annual Control of the Contro			
	Samp in hoxes Sampled < 4b		•	iple Inspe	#1.000		
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_		Sam	ple.#	0	0	O	Samples with broken, cracked or leaking containers
,	Are bubbles present in any of the VOA						
•	vials ?				hmer:	- - 	:
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_		Yes	No			Samp	oles with Unaccoptable pH
	Water - pH acceptable upon receipt?						:
	Cl pH adjusted - Preservative used	סאא ם			حصصور وجواويها	i □ ZnO	Academic (See Lot #16)
			Co	mments	i.		
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-	Project Management (Routing for inst	ruction of i	ndicated	discrep	ancy(ies	i)]	
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	Project Manager: (Initials)	Date:			Ç	lient cor	ntacted; Ye N
	Summary of discussion:						
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Compliance &

2005-00-0407

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APPENDIX B

Copies of Relevant Documents

NIFORM STRAIGHT BILL OF LADING Original—No	ot Negotiable—Do	mestic Shipper	** D81005-12
ENVIRONEX	Carrle		
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GENERATOR SENDS THIS COPY TO DTSC WITHIN 30 DAYS, P.O. Box 400, Socramento, CA 95812-0400

FAX NO. :9164827687

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Department of Toxic Substances Control

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