4115 Blackhawk Plaza Circle, Suite 100, Danville, CA 94506 (925) 648-2008 Fax (925) 648-2797

Compliance & Closure, Inc.

March 14, 2006

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

2006 MAR 21 PM 2:14

Attention: Ms. Susan Hugo

RE: Work Plan to Collect a Grab Water Sample
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 Work Plan to collect a grab water sample below the surface where ethylene glycol was detected in a soil sample collected at the Aqua Chlor facility, located at 15885 Altamont Pass Road, Tracy, Alameda County, California (Figure 1).

As the Alameda County, Environmental Health Services (ACEHS) is aware, ethylene glycol was detected at 1,700 milligrams per kilogram (mg/kg) in one of six soil samples collected at depths ranging from 15 to 22 inches below the ground surface. The ethylene glycol was detected in soil sample S-2 (Limited Closure Plan Report, September 18, 2005), collected near the former location of the freezer which was filled with antifreeze. The antifreeze was used to cool 20-pound field service cylinders prior to filling them with chlorine gas for use in Aqua Chlor's business (Figure's 2 & 3). CCI is of the opinion the ethylene glycol detected at S-2 is limited to the clay soil in the immediate area near the sample location. In order to determine the extent of migration of ethylene glycol, and in response to the March 8, 2006 meeting with the ACEHS, CCI proposes to drill one soil boring where sample S-2 was collected and will profile the soil to groundwater at that location. A review of Zone 7 Water Agency well logs of wells located within a ½-mile radius of the Aqua Chlor site indicates the nearest water supply well is located approximately 1,000 feet to the northwest of the subject site. The logs also indicate groundwater may be present at depths ranging from 29 to 55 feet below the ground surface (Appendix A). Soil samples will be collected at 5-foot intervals and at changes in lithology down to the water table. All the soil samples will be analyzed for ethylene glycol.

Soil Boring

The proposed soil boring will be drilled as follows:

CCI will retain BC2 Environmental of San Leandro, California to drill the boring, which will be drilled with a truck-mounted, CME 45drill rig, using 8-inch outside diameter hollow stem augers. The augers will be cleaned prior to use. A drilling permit from Zone 7 Water Agency will be obtained prior to the start of any drilling activity.

The boring will be advanced to the water table, estimated to be between 35 and 50 feet. A CCI geologist will log the borehole by collecting samples at 5-foot intervals or changes in lithology to the bottom of the boring. The soils encountered will be characterized using the Unified Soil Classification System. Soil samples will be collected using a pre-cleaned, modified, California split-spoon sampler with internal 2-inch diameter by 6-inch long stainless steel liners. The sampler will be driven 1-1/2 feet ahead of the auger with a 140-pound, rig-operated hammer. The sampler will then be removed and disassembled into its component parts. The soil samples collected for analysis will be capped, labeled and logged on a chain of custody form and placed in a cooler containing water ice for preservation in the field and during transport to a state-certified laboratory. All drill cuttings will be placed on and covered with plastic and left at the site pending laboratory analysis of the soil.

Groundwater sampling

Upon encountering groundwater, a grab water sample will be collected using a hydropunch groundwater sampler. The sampler is attached to the drilling rig A-rod, which is inserted inside the hollow stem auger. Once groundwater is encountered, the hollow stem auger and hydropunch will be pulled up approximately 4 feet, exposing a hollow stainless steel screen. The exposed screen will be allowed to fill with formation water, and a groundwater sample will be collected by lowering a stainless steal bailer through the hollow A-rods into the exposed hydropunch screen. The water sample will be placed in appropriate laboratory-supplied bottles, labeled, logged on a chain-of-custody form and stored in a chilled ice chest containing water ice for preservation in the field and during transport to a state-certified laboratory. Upon completion of sampling, the hydropunch and hollow stem auger will be removed and the borehole will be sealed, using a trimie hose, with Portland cement to the surface.

Laboratory Analysis

The soil and water samples will be transported to Entech Analytical Labs, Inc. (Entech), located in Santa Clara, California. All soil and water samples will be analyzed for ethylene glycol using EPA Test Method 8015B.

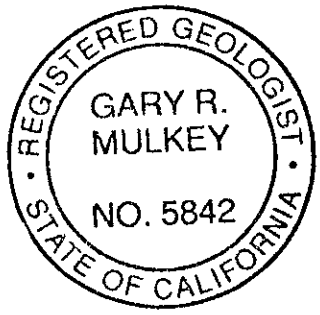
Report

At the conclusion of field activities, a letter report will be prepared documenting all field activities, and methods and procedures used to drill the soil boring, as well as laboratory results.

CCI is prepared to implement this Work Plan upon receiving approval from the ACEHS. CCI would like to complete the work as soon as possible and has tentatively scheduled a drilling date of April 6, 2006 with BC2 Environmental. If you have any questions or require additional information, please call our office at (925) 648-2008.

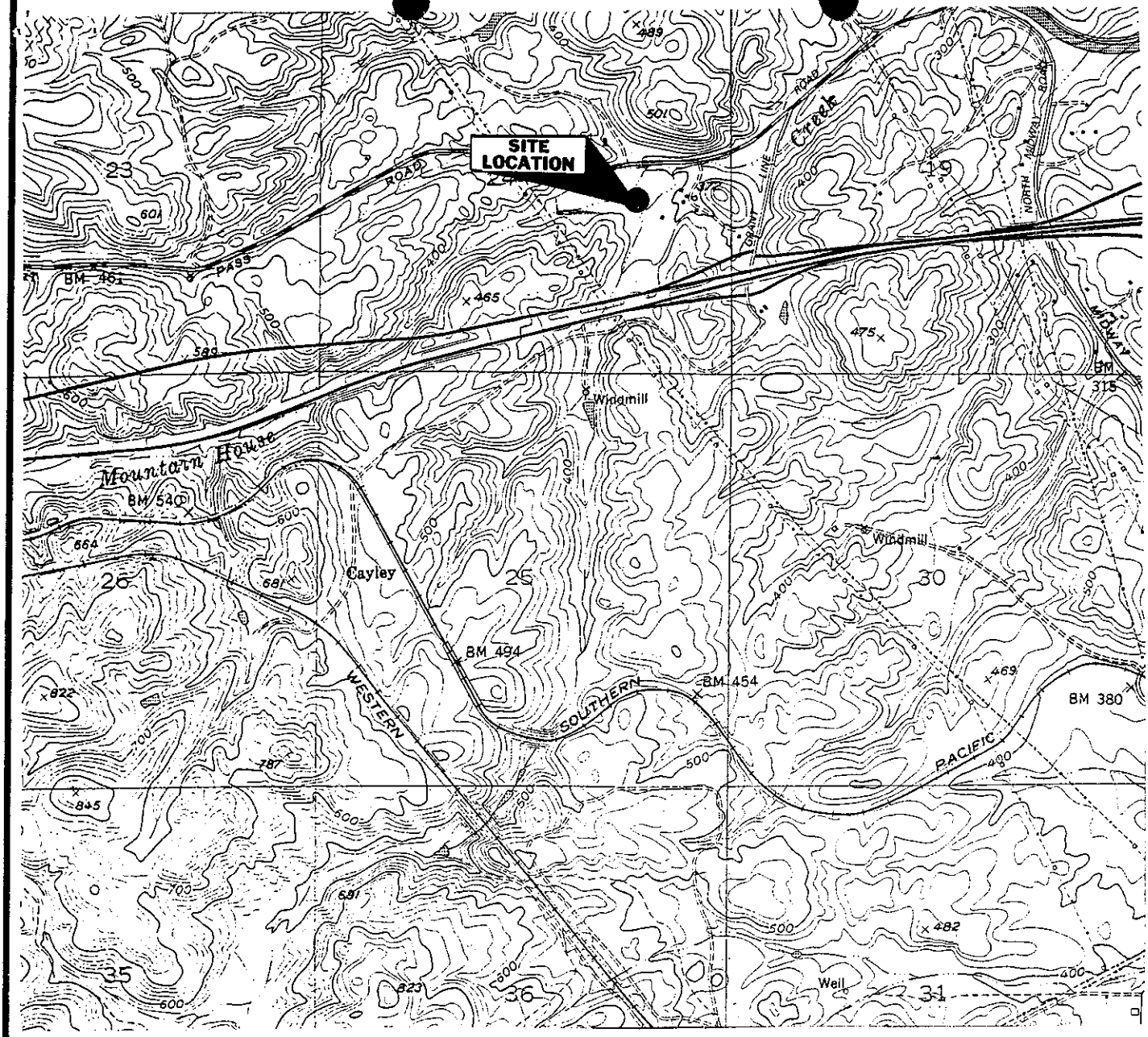
Sincerely,
Compliance & Closure, Inc.

Gary R. Mulkey



Gary R. Mulkey, R.G. 5842

cc: Mr. John Wallace, Aqua Chlor



SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

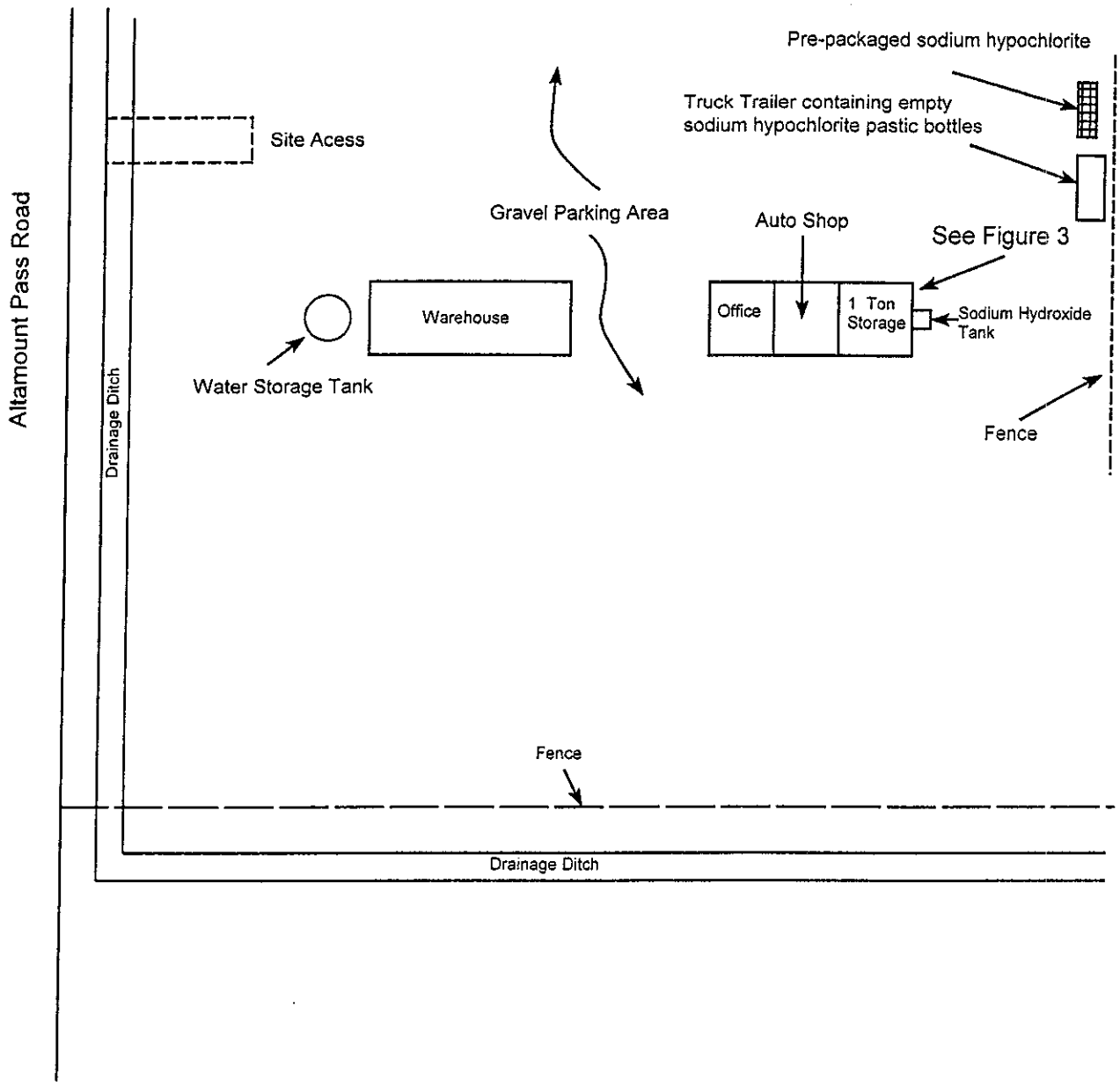
1 .5 0 1 KILOMETER

CONTOUR INTERVAL 20 FEET

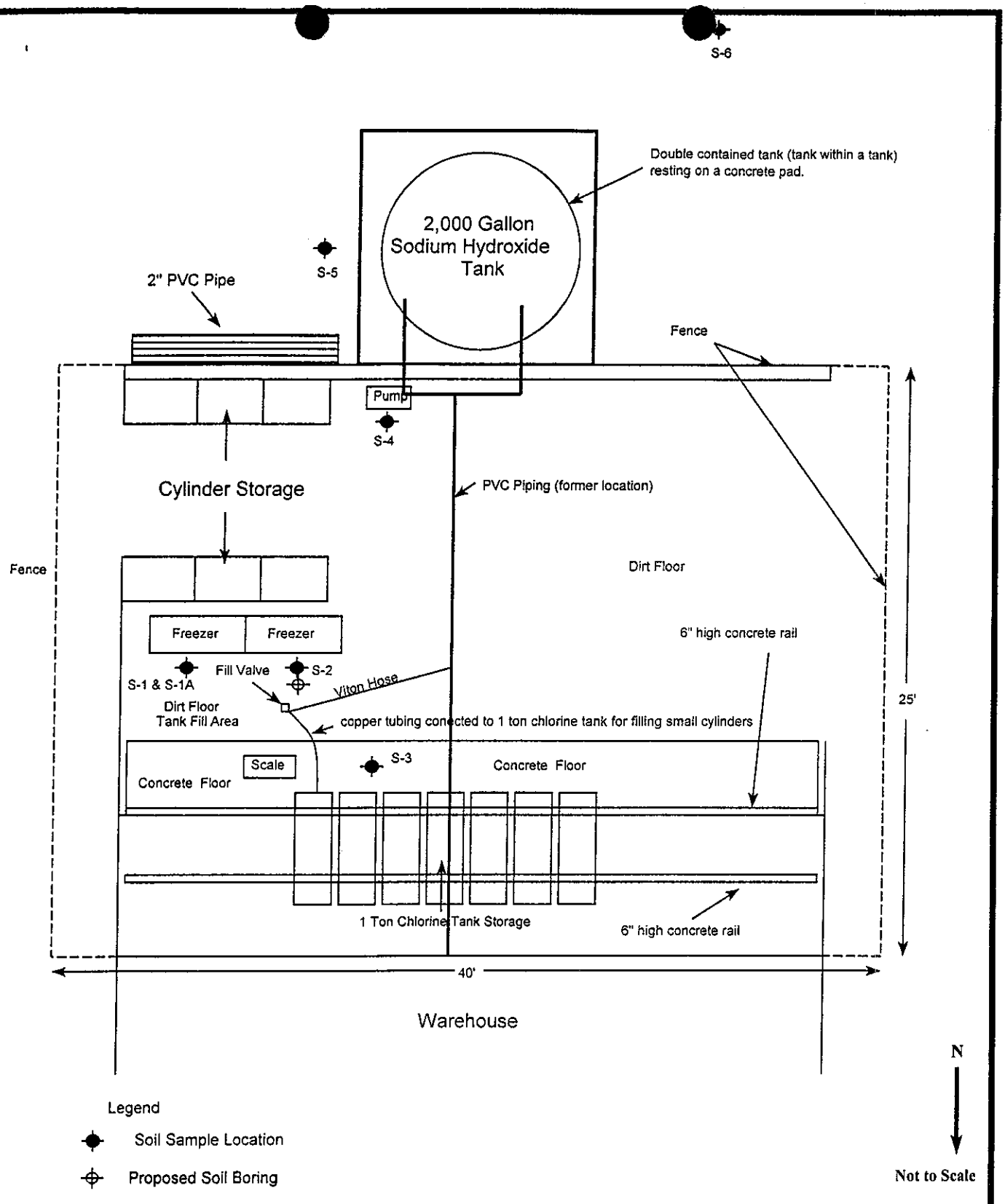
N

Base: U.S.G.S 7.5 Minute Midway Quadrangle

Reviewed By:	**VICINITY LOCATION MAP**	Compliance & Closure, Inc.
Approved By:	**Aqua Chlor** **15885 Altamont Pass Road** **Tracy, California**	Job No.: 12176-1 / Drawn By: GM Date: 3/14/2006 / Fig. No.: 1



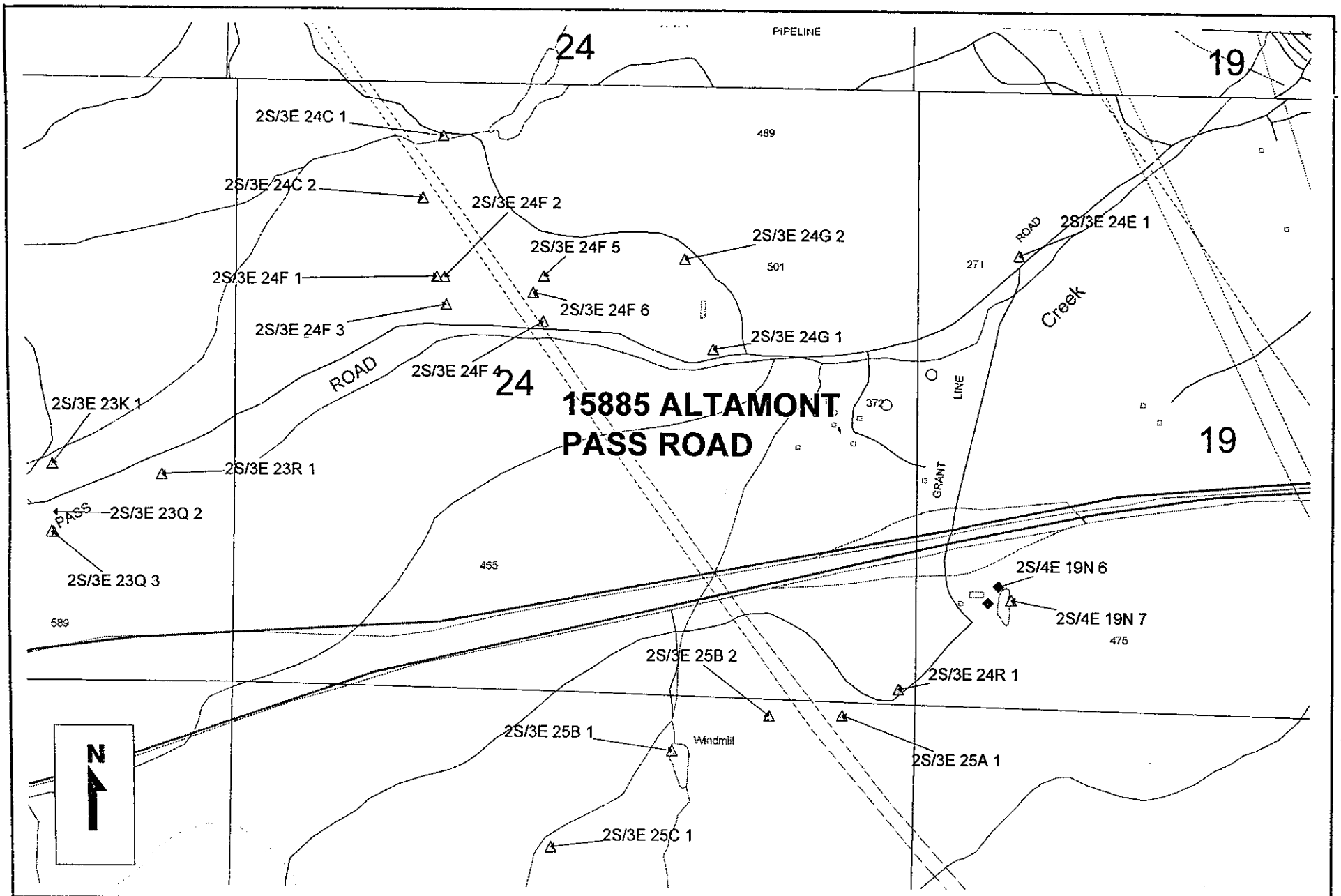
Reviewed By:	**GENERAL SITE MAP**	Compliance & Closure, Inc.
Approved By:	**AQUA CHLOR** **15885 Altamont Pass Road** **Tracy, California**	Job No.: 12176-1 / Drawn By: GM Date: 6/8/2005 / Fig. No.: 2



Reviewed By:	**PROPOSED BORING LOACTION MAP** **Aqua Chlor** **15885 Altamont Pass Road** **Tracy, California**	Compliance & Closure, Inc.
Approved By:		Job No.: 12176-1 / Drawn By: GM Date: 11/21/2005 / Fig. No.: 3

APPENDIX A

Zone 7 Water Agency ½ Mile Radius Well Survey



	ZONE 7 WATER AGENCY **100 NORTH CANYONS PARKWAY** **LIVERMORE, CA 94551**	**WELL LOCATION MAP**	**SCALE: 1"= 1000 ft** **DATE: 3/8/06** **15885 Altamont Pass Rd** H:\FLOOD\REFERALLS\REFERALLS.WOR

WAYNE SCHLOSSER WELL DRILLING

43 Cromwell Court
Danville, California
(415) 820-2394

(Designed to correspond to Dept. of Water Resources Report)

P # 7819

WORK SHEET ONLY

2S/3E-23Q3

1) OWNER:

Name JOHNSON

Address

2) LOCATION OF WELL:

County Alameda Owner's number, if any

Township, Range, and Section

Distance from cities, roads, railroads, etc 3 mi EAST of Altamont

3) TYPE OF WORK (check):

New Well ☑ Deepening ☐ Reconditioning ☐ Destroying ☐

If destruction, describe material and procedure in Item 11

4) PROPOSED USE (check):

Domestic ☑ Industrial ☐ Municipal ☐
Irrigation ☐ Test Well ☐ Other ☐

(5) EQUIPMENT:

Rotary ☑
Cable ☐
Other ☐

(6) CASING INSTALLED:

STEEL: OTHER:
SINGLE ☐ DOUBLE ☐

From ft.	To ft	Diam.	Gage or Wall	Diameter of Bore	From ft.	To Ft.
2	55	6	160	~~10~~ 12¼	0	55'

If gravel packed

Size of shoe or well ring Size of gravel: ⅛ to ¼

Describe joint

7) PERFORATIONS OR SCREEN:

Type of perforation or name of screen SAW CUT

From ft	To ft	Perf per row	Rows per ft.	Size in. x in.
20	55			

8) CONSTRUCTION:

Was a surface sanitary seal provided? Yes ☑ No ☐ To what depth 17' ft.

Were any strata sealed against pollution? Yes ☐ No ☑ If yes, note depth of strata

From ft to ft

From ft to ft

Method of sealing

9) WATER LEVELS:

Depth at which water was first found, if known 17 ft

Standing level before perforating, if known 12 ft

Standing level after perforating and developing 12 ft

10) WELL TESTS:

Was pump test made? Yes ☐ No ☑ If yes, by whom?

gal/min with ft drawdown after hrs

Temperature of water Was a chemical analysis made? Yes ☐ No ☐

Was electric log made of well? Yes ☐ No ☐ If yes, attach copy

(11) WELL LOG:

Total depth 55 ft. Depth of completed well 55 ft

Formation: *Describe by color, character, size of material, and structure*

0 ft. to 12 ft
DARK BROWN Clay
12 to 16' HARD ROCK
17' Water
17 to 50' Light BROWN
SAND Stone 50 to 55
Shale formation Light gray

Work Started _____ 19 _____ Completed _____ 19 _____

25/3E-23Q3

CONFIDENTIAL

STATE OF CALIFORNIA DWR
WELL COMPLETION REPORT
(WELL LOGS)

REMOVED

CONFIDENTIAL

STATE OF CALIFORNIA DWR
WELL COMPLETION REPORT
(WELL LOGS)

REMOVED

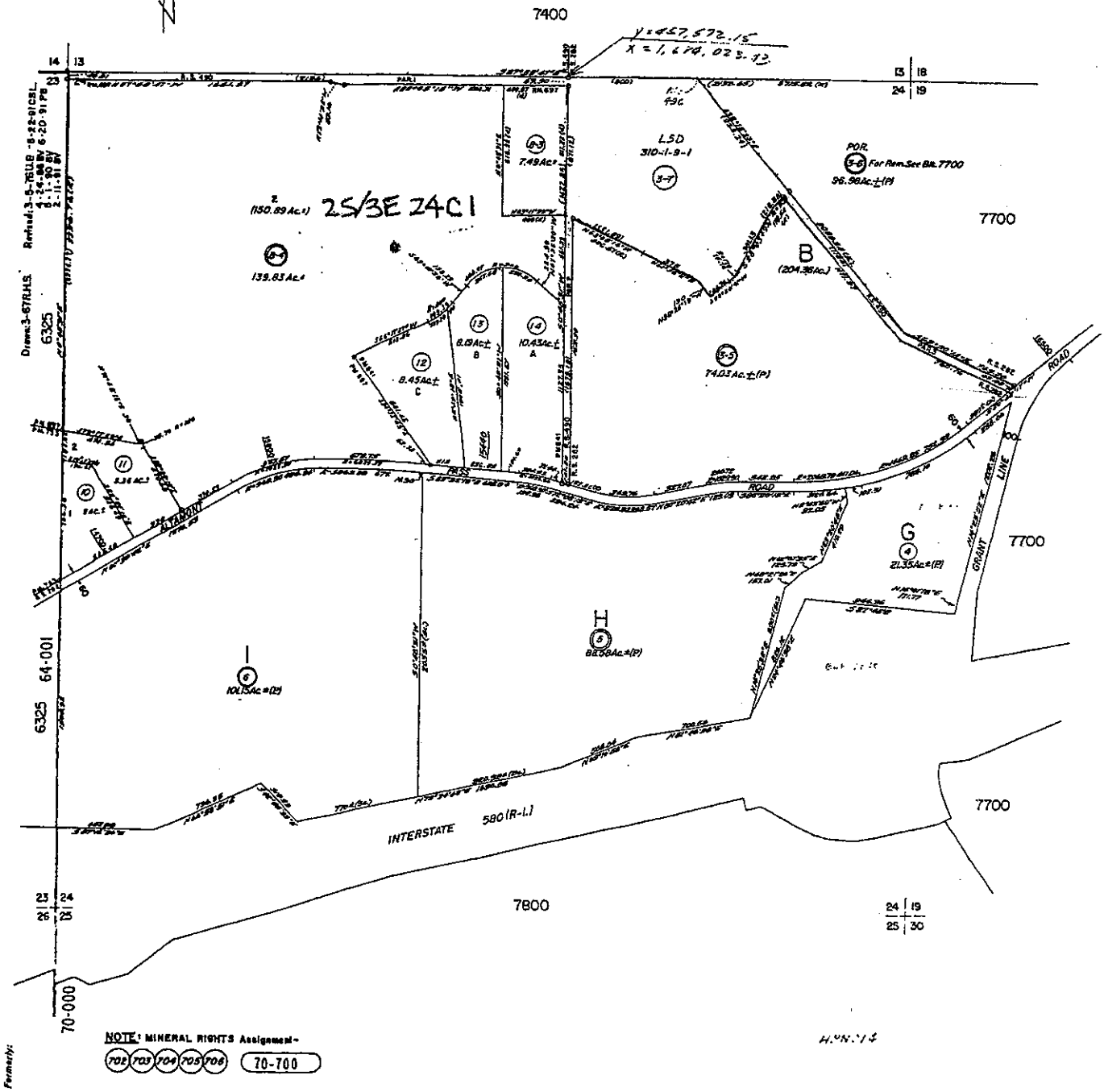
ASSESSOR'S MAP 99

Code Area Nos. 70-000 70-700

PERMIT 20073

7750 Scale: 1" = 500'

RECORD OF SURVEY 282 (R.S. Bk. 6 Pg. 10)
PARCEL MAP 697 (Bk. 69 Pg. 35)
P.M. 753 (Bk. 69 Pg. 90)
P.M. 841 (Bk. 72 Pg. 57)
R.S. 490 (R.S. Bk. 8 Pg. 98)



Formerly:

A.C.M. 50

Reference:

CONFIDENTIAL

STATE OF CALIFORNIA DWR
WELL COMPLETION REPORT
(WELL LOGS)

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STATE OF CALIFORNIA DWR
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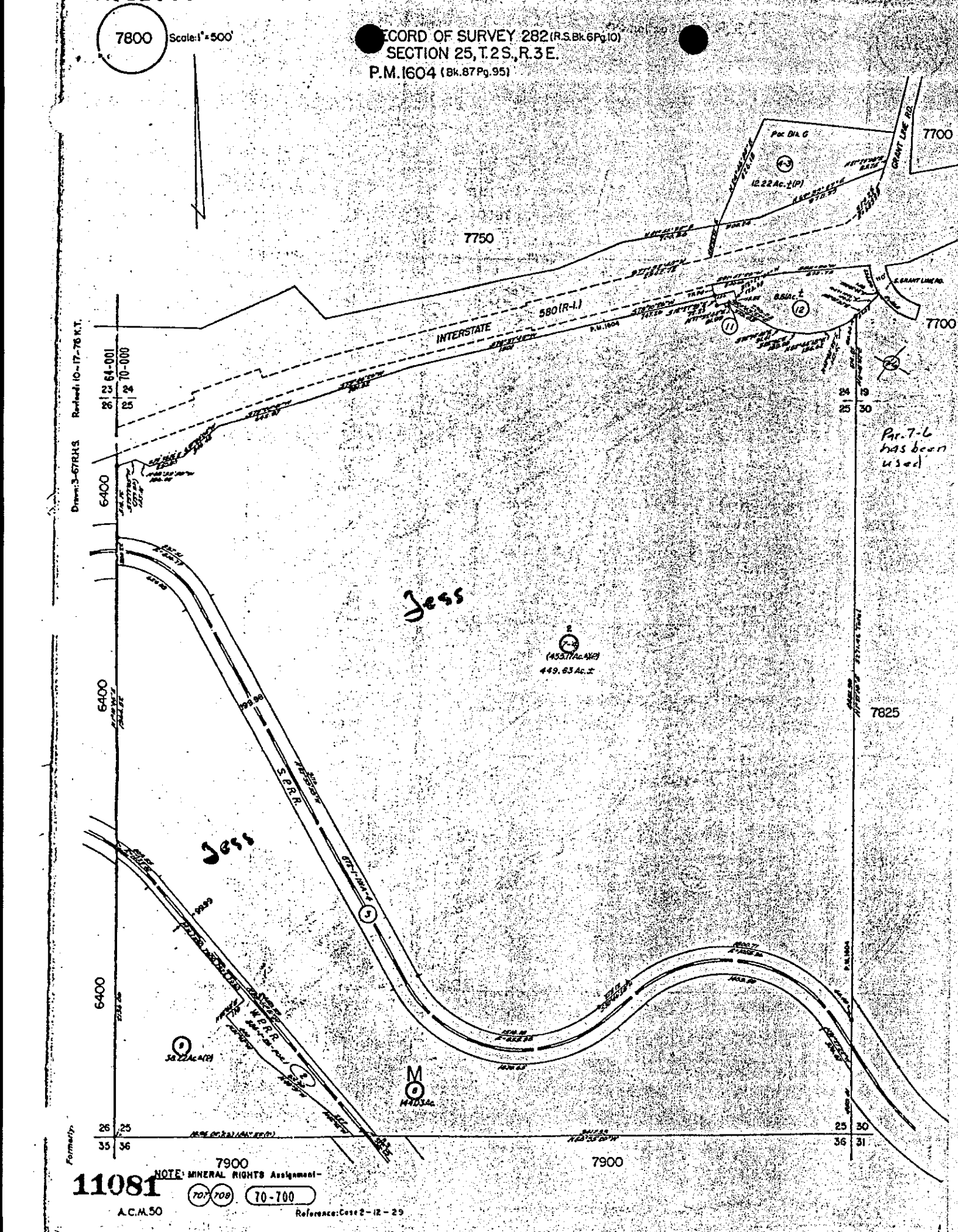
7800
Scale: 1" = 500'
RECORD OF SURVEY 282 (R.S. Bk. 6 Pg. 10)
SECTION 25, T. 2 S., R. 3 E.
P.M. 1604 (Bk. 87 Pg. 95)
7700
7750
7700
INTERSTATE 580 (R-1.)
S. GRANT LINE RD.
GRANT LINE RD.
Par. 7-6 has been used
6400
6400
6400
7825
Jess
Jess
S.P.R.R.
W.P.R.R.
7900
7900
11081
A.C.M. 50
NOTE: MINERAL RIGHTS Assignment-
70-700
Reference: Case 2-12-29
Formerly
Drawn: 3-67 R.N.S. Revised: 10-17-76 K.T.