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By Alameda County Environmental Health at 3:34 pm, Jun 11, 2013

May 15, 2013

Ms. Karel Detterman  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502

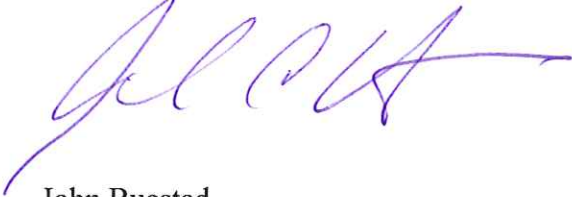
**Subject: Perjury Statement and Report Transmittal**  
1600 Park Street (Parcel A)  
Alameda, California 94501  
AEI Project No. 298931  
ACEH RO#00003112 (Formerly part of RO#0000008)

Dear Ms. Detterman:

I declare under penalty of perjury, that the information and/or recommendations contained in the attached report for the above-referenced site are true and correct to the best of my knowledge.

If you have any questions or need additional information, please do not hesitate to call me or Mr. Peter McIntyre at AEI Consultants, (925) 746-6004.

Sincerely,



John Buestad  
President

JB/pm

Attachment: AEI Consultants, *Conceptual Site Model Update & Request for Case Closure – May 2013*

cc: Mr. Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Walnut Creek, CA 94597



# AEI Consultants

Environmental & Engineering Services

May 15, 2013

## Conceptual Site Model Update & Request for Case Closure - May 2013

**Property Identification:**

1600 Park Street – Parcel A  
Alameda, California

AEI Project No. 298931  
ACEH Fuel Leak Case No. RO0003112  
(Formerly Known as  
ACEH Case No. RO0000008)

**Prepared for:**

Foley Street Investments  
Attn: Mr. John Buestad  
2533 Clement Avenue  
Alameda, CA 94501

**Prepared by:**

AEI Consultants  
2500 Camino Diablo  
Walnut Creek, CA 94597  
(925) 746-6000

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May 15, 2013

Alameda County Environmental Health Department  
Attn: Ms. Karel Detterman  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502

**Subject: Conceptual Site Model Update and  
Request for Case Closure – May 2013  
1600 Park Street – Parcel A  
Alameda, California  
AEI Project No. 298931  
ACEH Fuel Leak Case No. RO0003112**

Dear Ms. Detterman:

AEI has prepared this Conceptual Site Model and Request for Case Closure on behalf of Foley Street Investments (FSI) as part of the on-going environmental activities at 1600 Park Street in Alameda, California [Figure 1], also known as Parcel A (ACEH Fuel Leak No. RO0003112). The subject site was originally part of a larger single property known as 1630 Park Street in Alameda, California (ACEH Fuel Leak Case # RO 0000008). Recently, the property owner split the site into two parcels, "Parcel A" to the south, and "Parcel B" to the north (Figure 2). Documentation of the parcel split is included in Appendix B.

Environmental concerns within this parcel which have been investigated to date include:

- A 10,000-gallon gasoline underground storage tank (UST), 4,000-gallon gasoline UST, and 500-gallon waste oil UST, all of which were removed in November 2011.
- Four hydraulic lifts inside the former building which were removed in July 2012.
- A gas and oil area within the southwestern portion of the parcel as indicated by a historical Sanborn map.

During 2011, several soil borings were completed within these areas of concern which included the collection of soil and groundwater samples. Soil boring data, in conjunction with the soil and groundwater data obtained during the UST removal activities, indicated that a minor release from the former USTs had occurred which was limited in extent. Contaminated soil from the waste oil UST was excavated and removed from the site. Confirmation soil sampling confirmed that the source had been removed. Petroleum hydrocarbons were also detected within the groundwater of the gasoline UST cavity during removal activities, however were limited in extent as the soil within the UST cavity did not contain hydrocarbons, nor did the groundwater from soil borings adjacent to the UST cavity.

A geophysical survey completed in July 2011 did not identify any USTs associated with the gas and oil area identified in the historic documents, and soil borings did not indicate elevated hydrocarbons were present in this area. Soil borings in the vicinity of the former hydraulic hoists did not indicate that a significant release has occurred, and no obvious contamination was observed during the removal of the lifts. A detailed description of historical site activities is included in the attached Low Threat Closure Policy (LTCP) checklist and Conceptual Site Model (CSM).

Soil vapor samples collected beneath the northern portion of Parcel A did not contain constituents from previous Parcel B contamination, confirming that migration of constituents from the downgradient "off-site" source area has not occurred.

Using the information in the CSM, AEI completed the Alameda County Environmental Health Department (ACEHD) LTCP evaluation form provided during our meeting on April 12, 2013. The result indicates that Parcel A passes the LTCP criteria. It is expected that following the review of the LTCP checklist and CSM, the ACEHD will concur with the findings, resulting in no further action for Parcel A. Furthermore, it is anticipated that approval for the implementation of the development activities on Parcel A will be approved.

## **Report Limitations**

This report has been prepared by AEI Consultants relating to the property located at 1600 Park Street – Parcel A, in the City of Alameda, Alameda County, California. This report includes a summary of site conditions and relies heavily on information obtained from public records and other resources; AEI makes no warranty that the information summarized in this report includes consideration of all possible resources or information available for the site, whether referenced or not. Material samples have been collected and analyzed, and where appropriate conclusions drawn and recommendations made based on these analyses and other observations. This report may not reflect subsurface variations that may exist between sampling points. These variations cannot be fully anticipated, nor could they be entirely accounted for, in spite of exhaustive additional testing. This document should not be regarded as a guarantee that no further contamination, beyond that which could have been detected within the scope of past investigations is present beneath the property or that all contamination present at the site will be identified, treated, or removed. Undocumented, unauthorized releases of hazardous material(s) and petroleum products, the remains of which are not readily identifiable by visual inspection and/or are of different chemical constituents, are difficult and often impossible to detect within the scope of a chemical specific investigation and may or may not become apparent at a later time. All specified work has been performed in accordance with generally accepted practices in environmental engineering, geology, and hydrogeology and performed under the direction of appropriate California registered professionals.

We welcome comments and questions from ACEH staff. Please contact us (925) 746-6000.

Sincerely,  
**AEI Consultants**

Robert Robitaille  
Sr. Project Manager

Peter J. McIntyre, PG  
Sr. Vice President, Geologist

**Distribution:**

John Buestad, Foley Street Investments  
Karel Detterman, Alameda County Environmental Health Department (FTP Upload)  
GeoTracker (Upload)

**Attachments:**

Alameda County Low Threat Closure Policy Checklist

Updated Conceptual Site Model – May 2013

**FIGURES**

<i>FIGURE 1</i>	<i>SITE LOCATION MAP</i>
<i>FIGURE 2</i>	<i>SITE PLAN – PARCEL A</i>
<i>FIGURE 3</i>	<i>SOIL ANALYTICAL MAP – PARCEL A</i>
<i>FIGURE 4</i>	<i>GROUNDWATER ANALYTICAL MAP – PARCEL A</i>
<i>FIGURE 5</i>	<i>UTILITY MAP – PARCEL A</i>

**TABLES**

<i>TABLE 1</i>	<i>SOIL SAMPLE ANALYTICAL DATA – TPH, MBTEX AND POG</i>
<i>TABLE 2</i>	<i>SOIL SAMPLE ANALYTICAL DATA – VOCs, FUEL OXYGENATES AND PCB'S</i>
<i>TABLE 3</i>	<i>SOIL SAMPLE ANALYTICAL DATA – METALS</i>
<i>TABLE 4</i>	<i>GROUNDWATER ANALYTICAL DATA – TPH, MBTEX AND TRPH</i>
<i>TABLE 5</i>	<i>GROUNDWATER ANALYTICAL DATA – VOCs, OXYGENATES, SVOCs &amp; PCB'S</i>
<i>TABLE 6</i>	<i>GROUNDWATER ANALYTICAL DATA – METALS</i>
<i>TABLE 7</i>	<i>SOIL VAPOR SAMPLE ANALYTICAL DATA</i>
<i>TABLE 8</i>	<i>UST REMOVAL SAMPLE ANALYTICAL DATA TABLES</i>

**APPENDICIES**

<i>APPENDIX A</i>	<i>SOIL BORING LOGS</i>
<i>APPENDIX B</i>	<i>PARCEL SPLIT DOCUMENTATION</i>

**ALAMEDA COUNTY ENVIRONMENTAL HEALTH  
LOW THREAT UST CASE CLOSURE POLICY EVALUATION**

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Agency Name : Alameda County Environmental Health	Date:
Case Worker:	Fuel Leak Case No:
Site Name:	GeoTracker Global ID:
Site Address:	USTCF Claim No:

Alameda County Environmental Health (ACEH) has reviewed the above listed site for consideration of case closure using the framework provided by the State Water Resources Control Board (SWRCB) Low-Threat Underground Storage Tank Case Closure Policy (LTCP), adopted on May 1, 2012, and effective August 17, 2012. The results of ACEH's case review indicates that the site  PASSES  FAILS the LTCP criteria.

Section 25296.10 of the California Health and Safety Code (H&SC) requires that sites be cleaned up to protect human health, safety, and the environment. The current conceptual site model  is  is not adequate to determine that residual petroleum constituents at the site do not pose a significant risk to human health, safety, or the environment. A complete record of the case files (i.e., regulatory directives and correspondence, reports, data submitted in electronic deliverable format [EDF], etc.) can be obtained through review of both the SWRCB's Geotracker database, and the ACEH website at <http://www.acgov.org/aceh/index.htm>.

ACEH's LTCP evaluation and compliance determination is based on:

- A preliminary review of the case file and data reported in the most recent site documents
- A final review of the case file verifying the accuracy of the content, authenticity, and accuracy of the data uploaded to the database.

#### **Application of Case Review Tools**

ACEH's case closure evaluation and compliance determination was guided by the application of the principles and strategies presented in the *Leaking Underground Fuel Tank Guidance Manual* (CA LUFT Manual), dated September 2012, developed by the SWRCB "...[t]o provide guidance for implementing the requirements established by the Case Closure Policy" and associated reference documents including but not limited to:

- *Technical Justification for Vapor Intrusion Media-Specific Criteria*, SWRCB dated March 21, 2012;
- *Technical Justification for Groundwater Media-Specific Criteria*, SWRCB dated April 24, 2012;
- *Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways*, SWRCB dated March 15, 2012;
- *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, Final DTSC*, dated October, 2011;
- *Evaluating LNAPL Remedial Technologies for Achieving Project Goals, Interstate Technology Regulatory Council*

ACEH staff utilizes an enhanced LTCP checklist entitled *Data Gap Identification Tool* (DGIT) that integrates the requisite level of questioning to enable consistent application of the LTCP, identify impediments to closure, focus data collection on identified data gaps, develop an efficient strategy or path to closure, ensure that decisions are founded in appropriate technical basis, and document the decision making process as transparently as possible for all interested parties.

Our evaluation of the subject site is presented in the subsequent pages of this document.

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**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA A**

<b>General Criteria a:</b>		<input type="checkbox"/> Y	<input type="checkbox"/> N
<b>Is the Unauthorized Release Located within the Service Area of a Public Water System?</b>			
<p><b>LTCP Statement:</b> “This policy is protective of <u>existing water supply wells</u>. <u>New water supply wells</u> are unlikely to be installed in the shallow groundwater near former UST release sites. However, it is difficult to predict, on a statewide basis, where new wells will be installed, particularly in rural areas that are undergoing new development. This policy is limited to areas with available public water systems to reduce the likelihood that new wells in developing areas will be inadvertently impacted by residual petroleum in groundwater. Case closure outside of areas with a public water system should be evaluated based upon the fundamental principles in this policy and a site specific evaluation of developing water supplies in the area. For purposes of this policy, a <u>public water system</u> is a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.”</p>			
<b>If the unauthorized release is <u>located within</u> the service area of a public water supply system, then</b>			
Name of public water system agency?			
East Bay Municipal Utility District	<input type="checkbox"/>	Y	
Zone 7 Water Agency	<input type="checkbox"/>	Y	
City of Hayward Water	<input type="checkbox"/>	Y	
Alameda County Water District	<input type="checkbox"/>	Y	
Other:	<input type="checkbox"/>	Y	
Are there existing water supply wells or other sources of water in the vicinity of the site? <b>Use General Criteria e – CSM Well Survey sheet to support answer</b>	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
<i>Note: If yes, the site must still satisfy the groundwater media specific criteria for distance from the contaminant plume boundary to existing wells</i>			
<b>If the unauthorized release is <u>located outside</u> the service area of a public water supply system, then</b>			
Are there additional characteristics to consider that might result in a low-threat designation?	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
	<input type="checkbox"/>	NA	
Has a site-specific evaluation of developing water supplies in the area been conducted?	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
	<input type="checkbox"/>	NA	
Is impacted groundwater shallower than the sanitary seal requirement for supply wells in the applicable county?	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
	<input type="checkbox"/>	NA	
Applicable County Sanitary Seal Requirements:			
Are impacted perched water zones not a viable potential water supply?	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
	<input type="checkbox"/>	NA	
Does high salinity or low yield negate the impacted groundwater from drinking water beneficial use per State Water Board Resolution 1988-0063, or de-designated areas of the applicable Basin Plans?	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
	<input type="checkbox"/>	NA	
Will Water Quality Objectives (WQOs) in the groundwater plume be attained through natural attenuation within a reasonable time, prior to the expected need for use of any affected groundwater?	<input type="checkbox"/>	Y	
	<input type="checkbox"/>	N	
	<input type="checkbox"/>	NE	
	<input type="checkbox"/>	NA	

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA A**

**General Criteria a: Case Notes**

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable



**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA B**

<b>General Criteria b:</b>	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> NE	
<b>Does the Unauthorized Release Consist only of Petroleum?</b>				
<p><b>LTCP Statement:</b> “For purposes of this policy, petroleum is defined as crude oil, or any fraction thereof, which is liquid at standard conditions and temperature and pressure, which means 60 degrees Fahrenheit and 14.7 pounds per square inch absolute including the following substances: motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, petroleum solvents and used oils, including any additives and blending agents such as oxygenates contained in the formulation of the substances.”</p>				
Have adequate site investigation activities been conducted to evaluate unauthorized releases of potential chemicals of concern (PCOCs) and chemicals of concern (COCs) from on-site sources due to historical site activities and chemical usage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have areas of concern been identified based on historical site activities and chemical usage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have unauthorized releases from underground storage tanks been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have unauthorized releases from above ground storage tanks been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have unauthorized releases from site infrastructure (i.e., sumps, drains, sanitary sewer, etc) been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have unauthorized releases from surface spills at dispenser islands, tank fill ports, etc. been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have unauthorized releases from other on-site sources been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has the site been impacted by off-site sources?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are detected COCs <u>consistent</u> with reported site use?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
If detected COCs <u>are not consistent</u> with reported site use, then are there other regulatory cases in the vicinity of the site? Identify regulatory case number(s): <div style="border: 1px solid black; height: 20px; width: 50%; margin-top: 5px;"></div>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
If there <u>are not other regulatory cases</u> in the vicinity of the site, then has an investigation of other potential sources and contaminant migration pathways been conducted? <i>Use General Criteria e – Conceptual Site Model (Off-site sources) sheets to support answer</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has site contamination in all affected media been fully characterized? <i>Use page b-2 and General Criteria e – Conceptual Site Model COCs and PCOCs sheets to identify site contaminants</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Soil?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Soil Gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Groundwater?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Surface Water?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a data quality review verified the validity of historic analytical data? <i>Use General Criteria e – Conceptual Site Model Analytical Data Quality Review sheets to support answers</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have appropriate protocols been followed for obtaining representative samples?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are the analytical methods currently being used consistent with the recommended “best practices” in the CA LUFT Manual?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have appropriate method detection limits been used (i.e., less than the LTCP media specific criteria for groundwater, vapor intrusion to indoor air, and direct contact and outdoor air exposure, and/or current environmental screening levels as appropriate?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B**

**General Criteria b: Case Notes**

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

## LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

**Chemicals of Concern (COCs - detected) and Potential Chemicals of Concern (PCOCs – i.e., not detected but used in site operations) in Soil, Groundwater, Soil Gas, and/or Surface Water<sup>1</sup>**

COC/PCOC	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Gasoline<sup>2</sup></b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Fuel Oils<sup>3</sup></b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Diesel	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Stoddard Solvent	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Jet Fuels	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Kerosene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Home Heating Fuel	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Bunker Fuel	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Oils</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Waste Oil <sup>4</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hydraulic Oil	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Lubricating Oil	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Oil and Grease	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Motor Oil	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Aromatics</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Toluene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Xylenes	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Fuel Oxys<sup>5</sup></b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
MTBE <sup>6</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
ETBE	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TAME	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TBA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
DIPE	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethanol	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Methanol	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Leaded Gas</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TML <sup>7</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
EDC <sup>8</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
EDB <sup>8</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Wear Metals<sup>10</sup></b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Total Lead	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Cadmium	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Chromium	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Zinc	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Nickel	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Others</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
PAHs <sup>9</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
CVOCs <sup>11</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
PCBs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
PCPs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dioxins & Furans <sup>12</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ Y = Detected at site  
 ■ N = Tested for but never detected (method reporting limit less than current screening levels – validated by case review)  
 ■ NE = Identified Data Gap - Needs Further Evaluation (Tested for but never detected (method reporting limit greater than current screening levels)  
 ■ NA = Not Applicable (never present at site – validated by case review)

**LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B**

**Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water<sup>1</sup>**

**TOTAL PETROLEUM HYDROCARBON – GASOLINE RELATED CONSTITUENTS<sup>2</sup>**

COC/PCOC	Soil				Groundwater				Soil Gas, Crawl Space or Indoor Air				Surface Water			
	Y	N	NE	NA	Y	N	NE	NA	Y	N	NE	NA	Y	N	NE	NA
<b>TPH</b>																
TPH-g	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
GRO	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Aromatics</b>																
Benzene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Toluene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Xylenes	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Fuel Oxys<sup>5</sup></b>																
MTBE <sup>6</sup>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
ETBE	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TAME	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TBA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
DIPE	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethanol	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Methanol	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Leaded Gas</b>																
TML <sup>7</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
EDC <sup>8</sup>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
EDB <sup>8</sup>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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 NA = Not Applicable (never present at site – validated by case review)

**LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B**

**Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water<sup>1</sup>**

<b>TOTAL PETROLEUM HYDROCARBONS – DIESEL, JET FUEL, AND OTHER FUEL OIL RELATED CONSTITUENTS<sup>3</sup></b>																
<b>COC/PCOC</b>	<b>Soil</b>				<b>Groundwater</b>				<b>Soil Gas <input type="checkbox"/>, Crawl Space <input type="checkbox"/>, Indoor Air <input type="checkbox"/></b>				<b>Surface Water</b>			
	<b>TPH</b>															
TPH-d	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
DRO	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TEPH	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Aromatics</b>																
Benzene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Toluene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Xylenes	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Others</b>																
PAHs <sup>9</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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**LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B**

**Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water<sup>1</sup>**

<b>WASTE (USED) OILS<sup>4</sup></b>																
COC/PCOC	Soil				Groundwater				Soil Gas <input checked="" type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	TPH	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
TPH-g	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
GRO	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TPH-d	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
DRO	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TPH-mo	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TEPH	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
MORO	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Aromatics</b>																
Benzene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Toluene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Xylenes	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Fuel Olys</b>																
MTBE	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TBA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Wear Metals<sup>10</sup></b>																
Total Lead	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Cadmium	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Chromium	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Zinc	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Nickel	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Others</b>																
CVOCs <sup>11</sup>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
PCBs	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
PCPs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dioxins & Furans <sup>12</sup>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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  - NE = Identified Data Gap - Needs Further Evaluation (Tested for but never detected (method reporting limit greater than current screening levels)
  - NA = Not Applicable (never present at site – validated by case review)

**LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B**

**Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water<sup>1</sup>**

**NON PETROLEUM HYDROCARBON SOURCE - RELATED CONTAMINANTS**

COC/PCOC	Soil				Groundwater				Soil Gas <input type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
VOCs <sup>11</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
SVOCs <sup>13</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
OCPs <sup>14</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Herbicides <sup>15</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Metals <sup>16</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**REMEDATION - RELATED BYPRODUCTS**

COC/PCOC	Soil				Groundwater				Soil Gas <input type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Remediation Byproducts	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Chromium VI	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Other Metals <sup>16</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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**LOW THREAT CLOSURE POLICY – CONCEPTUAL SITE MODEL**

**Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water**

VOLATILE ORGANIC COMPOUNDS												
Compound	S	SG	GW	SW								
Benzene	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Bromobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Bromochloromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Bromodichloromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Bromoform	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Bromomethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
n-Butylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
sec-Butylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
tert-Butylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Carbon tetrachloride	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Chlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Chlorodibromomethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Chloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Chloroform	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Chloromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
2-Chlorotoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
4-Chlorotoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2-Dibromo-3-chloropropane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2-Dibromoethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Dibromomethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,3-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,4-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Dichlorodifluoromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1-Dichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2-Dichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1-Dichloroethene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
cis-1,2-Dichloroethene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
trans-1,2-Dichloroethene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2-Dichloropropane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
2,2-Dichloropropane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,3-Dichloropropane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1-Dichloropropene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Ethylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Hexachlorobutadiene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Isopropylbenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
p-Isopropyltoluene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Methylene chloride	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Naphthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
n-Propylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Styrene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1,1,2-Tetrachloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1,1,2-Tetrachloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Tetrachloroethene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Toluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2,4-Trichlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2,3-Trichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1,1-Trichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,1,2-Trichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Trichloroethene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Trichlorofluoromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2,3-Trichloropropane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,2,4-Trimethylbenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
1,3,5-Trimethylbenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Vinyl chloride	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
o-Xylene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
m-Xylene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
p-Xylene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Methyl-t-butyl ether	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA
Dichlorofluoromethane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y	<input checked="" type="checkbox"/>	N	<input type="checkbox"/>	NE	<input type="checkbox"/>	NA

- Key:
- Y = Detected at site
  - N = Tested for but never detected (method reporting limit less than current screening levels – validated by case review)
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LOW THREAT CLOSURE POLICY – CONCEPTUAL SITE MODEL

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water

SEMI-VOLATILE ORGANIC COMPOUNDS

Compound	S	SG	GW	SW				
1,2-Dichlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
1,2,4-Trichlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
1,3-Dichlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
1,4-Dichlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Chloronaphthalene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Chlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Methylnaphthalene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Methylphenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Nitroaniline	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Nitrophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,2'-oxybis (1-Chloropropane)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dichlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dimethylphenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dinitrophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dinitrotoluene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4,5-Trichlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4,6-Trichlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,6-Dinitrotoluene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
3-Nitroaniline	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
3,3'-Dichlorobenzidine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Bromophenyl-phenylether	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Chloro-3-methylphenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Chloroaniline	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Chlorophenyl-phenyl ether	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Methylphenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Nitroaniline	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Nitrophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4,6-Dinitro-2-methylphenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Acenaphthene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Acenaphthylene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Anthracene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(a)anthracene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Compound	S	SG	SW	GW				
Benzo(a)pyrene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(b)fluoranthene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(g,h,i)perylene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(k)fluoranthene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
bis(2-Chloroethoxy)-methane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
bis(2-Chloroethyl) ether	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
bis(2-Ethylhexyl)phthalate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Butylbenzylphthalate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Carbazole	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Chrysene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Di-n-butylphthalate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Di-n-octylphthalate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dibenz(a,h)anthracene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dibenzofuran	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Diethylphthalate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dimethylphthalate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Fluoranthene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Fluorene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachlorobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachlorobutadiene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachlorocyclopentadiene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachloroethane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Indeno(1,2,3-cd)pyrene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Isophorone	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
N-Nitroso-di-n-propylamine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
N-nitrosodiphenylamine	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Naphthalene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Nitrobenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Pentachlorophenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Phenanthrene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Phenol	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Pyrene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

- Key:
- Y = Detected at site
  - N = Tested for but never detected (method reporting limit less than current screening levels – validated by case review)
  - NE = Identified Data Gap - Needs Further Evaluation (Tested for but never detected (method reporting limit greater than current screening levels)
  - NA = Not Applicable (never present at site – validated by case review)

## LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

### Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water<sup>1</sup>

#### Notes:

CVOCS = Chlorinated Volatile Organic Compounds

DIPE = di-isopropyl ether

EDC (ethylene dichloride) or 1,2-DCA (1,2-dichloroethane or ethylene dibromide)

EDB = 1,2-dibromomethane

ETBE = ethyl tert butyl ether

MTBE = methyl tert butyl ether (banned in CA since 2004)

OCPs = Organochlorine Pesticides

PAH = Polycyclic Aromatic Hydrocarbons or Polynuclear Aromatic Hydrocarbons

PCPs = Pentachlorophenol (wood preservative)

TAME = tert amyl methyl ether

TBA = t-Butyl Alcohol

TEL = tetra ethyl lead

TML = tetra methyl lead

SVOCs = Semi-volatile Organic Compounds

VOCs = Volatile Organic Compounds

1 = The analytes listed below are recommended in the CA LUFT Manual to ensure that site characterization is complete. Note that more analytes are recommended than are used as “criteria” chemicals in the LTCP for the various media.

2 = **CA LUFT Manual recommended analyses for gasoline releases** include BTEX, naphthalene, and fuel oxygenates (MTBE and TBA) and/or lead scavengers if gasoline release was pre-1992.

3 = **CA LUFT Manual recommended analyses for fuel oil releases** include BTEX, and naphthalene. Additionally, for heavy fuel oil such as bunker fuel the priority pollutant PAHs should be added to the list of analytes.

4 = **CA LUFT Manual recommended analyses for waste (used) motor oils** include BTEX, the 16 priority pollutant PAHs, chlorinated solvents (which will include EDB and EDC), and fuel oxygenates (MTBE and TBA). For soil only analysis for the five “wear metals” is also recommended.

5 = ACEH recommended analysis of all fuel oxygenates

6 = MTBE to be analyzed at all LUFT sites unless the tank contained only diesel or jet fuel per California Health and Safety Code 25296.15(a). MTBE was added to gasoline in California starting in approximately the late 1980’s/early 1990’s and was banned in 2004.

7 = Samples to be analyzed for tetra methyl lead

8 = Samples to be initially analyzed for lead scavengers EDC and EDB for all release sites and fuel oxygenates

9 = Use page b-8 to identify priority PAHs

10 = Wear metals need only be analyzed for soil

11 = Use page b-7 to identify specific VOCs

12 = Analyzed for dioxins and furans if PCBs and/or PCPs are detected

13 = Use page b-8 to identify specific SVOCs

14 = Use page b- to identify OCPs

15 = Use page b- to identify herbicides

16 = Use page b- to identify metals (in addition to the 5 wear metals)

## LOW THREAT CLOSURE POLICY - GENERAL CRITERIA C

<b>General Criteria c:</b> <b>Has the Unauthorized (“Primary”) Release from the UST System been Stopped?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**LTCP Statement:** “The tank, pipe, or other appurtenant structure that released petroleum into the environment (i.e. the primary source) has been removed, repaired or replaced. It is not the intent of this policy to allow sites with ongoing leaks from the UST system to qualify for low-threat closure.”

**Fuel Dispensing Facility History (list in chronological order, starting with operational in-place tanks)**

	Contents (gas - (leaded, unleaded), diesel, waste oil, etc.)	Type (steel, fiberglass single- walled, double- walled)	Evidence of Release?  (Y/N)	Closed in Place, Removed, or Upgraded?	Responsible Party (Organization Name, Type)	Date Installed	Date Removed
Tank (capacity in gallons)							
Piping							
Dispensers							
Other Structures							

Is the site currently an operating fuel dispensing facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have there been multiple tank system locations at the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have there been multiple releases at the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Was there a previous/different regulatory case at this site? Identify previous case number: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there evidence of releases from other on-site sources besides the UST system(s)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there indication of impacts from offsite sources?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use General Criteria e – Conceptual Site Model (Sources) sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA C**

**General Criteria c:**

**Has the Unauthorized (“Primary”) Release from the UST System been Stopped?**

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

## LOW THREAT CLOSURE POLICY - GENERAL CRITERIA D

<b>General Criteria d:</b>				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has Free Product been Removed to the Maximum Extent Practicable?</b>							
<p><b>LTCP Statement:</b> "At petroleum unauthorized release sites where investigations indicate the presence of free product, free product shall be removed to the maximum extent practicable. In meeting the requirements of this section:</p> <p>(a) Free product shall be removed in a manner that minimizes the spread of the unauthorized release into previously uncontaminated zones by using recovery and disposal techniques appropriate to the hydrogeologic conditions at the site, and that properly treats, discharges or disposes of recovery byproducts in compliance with applicable laws;</p> <p>(b) Abatement of free product migration shall be used as a minimum objective for the design of any free product removal system; and</p> <p>(c) Flammable products shall be stored for disposal in a safe and competent manner to prevent fires or explosions."</p>							
Has free product (migrating of mobile LNAPL) been detected in site monitoring wells?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
MW ID	Date FP First Observed	Max FP Apparent Thickness (feet), sheen, or globules	Most Recently Observed FP Apparent Thickness (feet)	Date of Most Recent FP Observation			
Has a description of the standard operating procedures used to measure free product in wells been provided?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an adequate LNAPL Conceptual Site Model been developed?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Was free product observed during tank removal activities or station upgrades?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an evaluation of the adequacy of the monitoring well network and appropriateness of screen interval to detect free product been conducted?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have there been other indications of the presence of free product (i.e., observations during tank removal, observations during exploratory drilling, bore logs, dissolved phase concentrations of COCs greater than their effective solubility's in groundwater, etc.)				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a preferential pathway study been conducted to determine the probability of free product encountering geologic and anthropogenic preferential pathways and conduits that can act as contaminant migration pathways to or from the site?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has the LNAPL body spatial distribution (horizontal and vertical) been defined?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are there risk and exposure issues attributed to the presence of the LNAPL?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an evaluation of whether free product removal is practicable, or if not practicable, a description of the conditions that prevent free product removal been conducted?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Use General Criteria e - Conceptual Site Model (Free Product) sheets to support answer</b>							
Has free product removal been implemented?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Location/ MW ID	Method (Absorbent Materials, Bailing, Skimmer, DPE, Excavation, etc.)	Cumulative Gallons/Volume/Mass Removed		Dates Implemented			
Does data indicate rebound of free product subsequent to product removal?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

## LOW THREAT CLOSURE POLICY - GENERAL CRITERIA D

### **General Criteria d:**

**Has Free Product been Removed to the Maximum Extent Practicable?**

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA E**

<b>General Criteria e:</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
<b>Has a Conceptual Site Model that Assesses the Nature, Extent, and Mobility of the Release been Developed?</b>			
<p><b>LTCP Statement:</b> "The Conceptual Site Model (CSM) is a fundamental element of a comprehensive site investigation. The CSM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The CSM is relied upon by practitioners as a guide for investigative design and data collection. Petroleum release sites in California occur in a wide variety of hydrogeologic settings. As a result, contaminant fate and transport and mechanisms by which receptors may be impacted by contaminants vary greatly from location to location. Therefore, the CSM is unique to each individual release site. All relevant site characteristics identified by the CSM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy. The supporting data and analysis used to develop the CSM are not required to be contained in a single report and may be contained in multiple reports submitted to the regulatory agency over a period of time."</p>			
Has a CSM been prepared that is representative of current site conditions?			<input type="checkbox"/> Y <input type="checkbox"/> N
<b>Document Title</b>	<b>Author</b>	<b>Date</b>	
<i>If the CSM is provided in multiple documents, provide additional document titles, authors and dates in the Case File Reference document section on page e-2</i>			
Is the CSM <u>comprehensive</u> enough to show compliance with all the LTCP criteria and that final closure review is appropriate?			<input type="checkbox"/> Y <input type="checkbox"/> N
<b>General Criteria</b>			
a	The unauthorized release is located within the service area of a public water system	<input type="checkbox"/> Y	<input type="checkbox"/> N
b	The unauthorized release consists only of petroleum	<input type="checkbox"/> Y	<input type="checkbox"/> N
c	The unauthorized ("primary") release from the UST system has been stopped	<input type="checkbox"/> Y	<input type="checkbox"/> N
d	Free product has been removed to the maximum extent practicable	<input type="checkbox"/> Y	<input type="checkbox"/> N
e	A CSM that assesses the nature, extent, and mobility of the release has been developed	<input type="checkbox"/> Y	<input type="checkbox"/> N
f	Secondary source has been removed to the extent practicable	<input type="checkbox"/> Y	<input type="checkbox"/> N
g	Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code section 25296.15	<input type="checkbox"/> Y	<input type="checkbox"/> N
h	Nuisance as defined by Water Code section 13050 does not exist at the site	<input type="checkbox"/> Y	<input type="checkbox"/> N
<b>Media-Specific Criteria</b>			
Groundwater		<input type="checkbox"/> Y	<input type="checkbox"/> N
Vapor Intrusion to Indoor Air		<input type="checkbox"/> Y	<input type="checkbox"/> N
Direct Contact and Outdoor Air Exposure		<input type="checkbox"/> Y	<input type="checkbox"/> N
<b>If the CSM is <u>not comprehensive</u> enough to show compliance with all the LTCP criteria, then</b>			
Has a data gap investigation work plan been prepared that is guided by the CSM?		<input type="checkbox"/> Y	<input type="checkbox"/> N
Has a path to closure plan been prepared that is guided by the CSM?		<input type="checkbox"/> Y	<input type="checkbox"/> N

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA E**

**General Criteria e: Case Notes**

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable



**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA F**

<b>General Criteria f:</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
<b>Has Secondary Source been Removed to the Extent Practicable?</b>			

**LTCP Statement:** "Secondary source" is defined as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Unless site attributes prevent secondary source removal (e.g. physical or infrastructural constraints exist whose removal or relocation would be technically or economically infeasible), petroleum-release sites are required to undergo secondary source removal to the extent practicable as described herein. "To the extent practicable" means implementing a cost-effective corrective action which removes or destroys-in-place the most readily recoverable fraction of source-area mass. It is expected that most secondary mass removal efforts will be completed in one year or less. Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy."

Has corrective action been implemented at the site to remove or destroy-in-place the most readily recoverable fraction of source-area mass?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Soil remediation	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Method	Mass/Volume Removed	Dates of Implementation

If soil remediation is currently being conducted, then is it progressing adequately?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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If soil remediation is no longer being conducted then, has confirmation sampling results confirmed that additional corrective actions are not necessary?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Are additional soil remedial actions necessary to meet the media-specific criteria of the Policy or to abate a demonstrated threat to human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Groundwater Remediation	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Method	Mass/Volume Removed	Dates of Implementation

If groundwater remediation is currently being conducted, then is it progressing adequately?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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If groundwater remediation is no longer being conducted then, has verification monitoring confirmed that additional corrective actions are not necessary?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Are additional groundwater remedial actions necessary to meet the media-specific criteria of the Policy or to abate a demonstrated threat to human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Use sheet f-2 - Maximum Detected Contaminant Concentrations Before and After Corrective Action to support your answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable



## LOW THREAT CLOSURE POLICY - GENERAL CRITERIA F

### General Criteria f: Case Notes

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA G**

<b>General Criteria g:</b>				
<b>Has Soil or Groundwater been Tested for MTBE and Results Reported in Accordance with Health and Safety Code Section 25296.15?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**LTCP Statement:** "Health and Safety Code section 25296.15 prohibits closing a UST case unless the soil, groundwater, or both, as applicable have been tested for MTBE and the results of that testing are known to the Regional Water Board. The exception to this requirement is where a regulatory agency determines that the UST that leaked has only contained diesel or jet fuel. Before closing a UST case pursuant to this policy, the requirements of section 25296.15, if applicable, shall be satisfied."

<b>Exemption</b> - Has sufficient data been presented to determine that the UST that leaked has only contained diesel or jet fuel?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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If the site does not qualify for the exemption then

Has sufficient data been presented to assess whether MTBE is or was present in soil at or in the vicinity of the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been presented to assess whether MTBE is or was present in groundwater at or in the vicinity of the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have all results been verified by the appropriate analytical laboratory method?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

***Use General Criteria b pages b-3 and General Criteria e – Conceptual Site Model sheets to support answer***

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

## LOW THREAT CLOSURE POLICY - GENERAL CRITERIA H

<b>General Criteria h:</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N		<input type="checkbox"/> NE
<b>Does a Nuisance as Defined by Water Code Section 13050 Exist at the Site?</b>				
<p><b>LTCP Statement:</b> "Water Code section 13050 defines "nuisance" as anything which meets <u>all</u> of the following requirements:</p> <p>(1) Is injurious to health, <u>or</u> is indecent or offensive to the senses, <u>or</u> an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.</p> <p>(2) Affects at the same time an entire community or neighborhood, <u>or</u> any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.</p> <p>(3) Occurs during, <u>or</u> as a result of, the treatment <u>or</u> disposal of wastes.</p> <p>For the purpose of this policy, waste means a petroleum release."</p>				
Does a nuisance condition currently exist (or potentially could exist) that meets all of the following criteria?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is injurious to health? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is indecent or offensive to the senses? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is an obstruction to the free use of property so as to interfere with the comfortable enjoyment of life or property?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Affects at the same time an <u>entire community</u> , although the extent of the annoyance or damage inflicted upon individuals may be unequal? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Affects at the same time an <u>entire neighborhood</u> , although the extent of the annoyance or damage inflicted upon individuals may be unequal? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Affects at the same time <u>any considerable number of persons</u> , although the extent of the annoyance or damage inflicted upon individuals may be unequal?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs during the treatment of waste? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs during the disposal of waste? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs as a result of the treatment of waste? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs as a result of the disposal of waste?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an evaluation of whether site contamination is present in locations that have the potential to pose nuisance conditions during common or reasonably expected site activities been conducted?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Surface soils?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Utility corridors?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Groundwater?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Surface water?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Soil gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Basements or other subsurface structures?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<p><i>Use the following to support your answer:</i></p> <ul style="list-style-type: none"> <li>• <i>General Criteria a (site located within a service area of a public water supply system)</i></li> <li>• <i>General Criteria b (identified chemicals of concern and potential chemicals of concern)</i></li> <li>• <i>General Criteria d (free product evaluation)</i></li> <li>• <i>General Criteria e (results of preferential pathway and sensitive receptor survey)</i></li> <li>• <i>Media Specific Criteria for Groundwater</i></li> <li>• <i>Media Specific Criteria for Vapor Intrusion to Indoor Air</i></li> <li>• <i>Media Specific Criteria for Direct Contact and Outdoor Air Exposure</i></li> </ul>				

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY - GENERAL CRITERIA H**

**General Criteria h: Case Notes**

**Case File Reference Documents:**

**Attachments:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

<b>Does the site qualify for the Soil Only Case exemption? -OR-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
<b>Does the site satisfy the Media-Specific Criteria for Groundwater?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE

**LTCP Statement:** “This policy describes criteria on which to base a determination that threats to existing and anticipated beneficial uses of groundwater have been mitigated or are de minimis, including cases that have not affected groundwater.

State Water Board Resolution 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304* is a state policy for water quality control and applies to petroleum UST cases. Resolution 92-49 directs that water affected by an unauthorized release attain either background water quality or the best water quality that is reasonable if background water quality cannot be restored. Any alternative level of water quality less stringent than background must be consistent with the maximum benefit to the people of the state, not unreasonably affect current and anticipated beneficial use of affected water, and not result in water quality less than that prescribed in the water quality control plan for the basin within which the site is located. Resolution No. 92-49 does not require that the requisite level of water quality be met at the time of case closure; it specifies compliance with cleanup goals and objectives within a reasonable time frame.

Water quality control plans (Basin Plans) generally establish “background” water quality as a restorative endpoint. This policy recognizes the regulatory authority of the Basin Plans but underscores the flexibility contained in Resolution 92-49.

It is a fundamental tenet of this low-threat closure policy that if the closure criteria described in this policy are satisfied at a petroleum unauthorized release site, attaining background water quality is not feasible, establishing an alternate level of water quality not to exceed that prescribed in the applicable Basin Plan is appropriate, and that water quality objectives will be attained through natural attenuation within a reasonable time, prior to the expected need for use of any affected groundwater.

If groundwater with a designated beneficial use is affected by an unauthorized release, to satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed below. A plume that is “stable or decreasing” is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration.”

**“Sites with Releases that Have Not Affected Groundwater** - Sites with soil that does not contain sufficient mobile constituents [leachate, vapors, or light non-aqueous-phase liquids (LNAPL)] to cause groundwater to exceed the groundwater criteria in this policy shall be considered low-threat sites for the groundwater medium. Provided the general criteria and criteria for other media are also met, those sites are eligible for case closure. For older releases, the absence of current groundwater impact is often a good indication that residual concentrations present in the soil are not a source for groundwater pollution.”

Has adequate data been collected to demonstrate that soil does not contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria in this policy?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE															
<table border="1"> <tr> <td>Leachate?</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> <td><input type="checkbox"/> NE</td> <td><input type="checkbox"/> NA</td> </tr> <tr> <td>Soil gas?</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> <td><input type="checkbox"/> NE</td> <td><input type="checkbox"/> NA</td> </tr> <tr> <td>LNAPL?</td> <td><input type="checkbox"/> Y</td> <td><input type="checkbox"/> N</td> <td><input type="checkbox"/> NE</td> <td><input type="checkbox"/> NA</td> </tr> </table>	Leachate?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	Soil gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	LNAPL?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA			
Leachate?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA														
Soil gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA														
LNAPL?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA														
If the site does not qualify for the soil only exemption, then Does groundwater in the vicinity of the site have beneficial use designations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE															

**Use General Criteria e – Conceptual Site Model sheets to support answer**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

GROUNDWATER PLUME STABILITY				
<b>If the site <u>does not</u> qualify for the soil only exemption, and groundwater has designated beneficial uses, then,</b>				
<b>Is the contaminant plume stable or decreasing in areal extent?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Technical Justification for Groundwater Media-Specific Criteria:** "A plume is considered stable or decreasing if a contaminant mass has expanded to its maximum extent: the distance from the release where attenuation exceeds migration. There are two common ways to demonstrate plume stability. The first common way is to routinely observe non-detect values for groundwater parameters in down-gradient wells. The second common way is to show stable or decreasing concentration levels in down-gradient wells at the distal end of the plume. It should be noted that concentration levels may exhibit fluctuation due to seasonal variations. These variations may be also attributed to man-made factors, including but not limited to: varying sampling techniques, false positive results, or laboratory inconsistencies."

"Requiring that a plume must be stable or decreasing reduces uncertainty as to how long the plume might become in the future."

Has the maximum stabilized plume length been defined?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have non-detect values for groundwater parameters in down-gradient wells at the distal end of the plume been routinely observed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

MW ID's	Dates of GW Monitoring Events Demonstrating Non-Detect Values?

Have stable or decreasing concentration levels in down-gradient wells at the distal end of the plume been routinely observed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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MW ID's	Dates of GW Monitoring Events Demonstrating Stability?

Do concentration levels exhibit fluctuations due to seasonal variations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Do concentration levels exhibit fluctuations due to man- made factors?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Varying Sampling Techniques?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
False Positive Results?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Laboratory Inconsistencies?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable



**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

**GROUNDWATER CONTAMINANT PLUME CLASSIFICATION CHARACTERISTICS**

If the Contaminant Plume is Stable or Decreasing, then

Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of at least one of the five (5) LTCP classes listed below?

Y

N

NE

NA

	Plume Length <sup>1</sup> (feet)	Free Product Remaining <sup>2</sup> (Yes/No)	Distance of Nearest Water Supply Well from Plume Boundary <sup>3</sup> (feet)	Distance of Nearest Surface Water Body from Plume Boundary <sup>4</sup> (feet)	Stable or Decreasing Plume <sup>5</sup>	Maximum Dissolved Benzene Concentration <sup>6</sup> (µg/L)	Maximum Dissolved MTBE Concentration <sup>6</sup> (µg/L)	Property Owner Willing to Accept Land Use Restriction <sup>7</sup>			
Site											
Does the contaminant plume that exceeds water quality objectives meet <u>all of the characteristics</u> of at least <u>one of the five LTCP classes</u> listed below?									<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
1 <sup>a</sup>	< 100	No	>250	>250	Yes	NA	NA	NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
2 <sup>b</sup>	<250	No	>1,000	>1,000	Yes	<3,000	<1,000	NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
3 <sup>c</sup>	<250	Yes	>1,000	>1,000	> 5 Years	NA	NA	Yes	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
4 <sup>d</sup>	<1,000	No	>1,000	>1,000	Yes	<1,000	<1,000	NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
5 <sup>e</sup>	A site-specific analysis determines that under current and reasonable anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable period time frame.								<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE

**Notes:**

1 = The length of the plume is the maximum extent from the point of release of any petroleum related constituent in groundwater that exceeds the WQOs. The plume boundary is where the constituent(s) furthest from the point of release concentration level equals the WQOs (Technical Justification for Groundwater Specific Criteria). **General Criteria – Conceptual Site Model pages e-\_\_\_ through e-\_\_\_ to support plume length determination.**

2 = A “Yes” designation signifies free product remains at the site, has been removed to the maximum extent practicable, but does not extend off-site. A “No” designation means free product does not exist onsite or off-site. **See General Criteria – Conceptual Site Model pages e-\_\_\_ through e-\_\_\_ to support free product status.**

(See page gw-4 for a continuation of notes)

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

**LTCP Groundwater Contaminant Plume Classification Characteristics**

**Notes (continued):**

- 3 = **See General Criteria – Conceptual Site Model sheets** to support distance to nearest water supply well.
- 4 = **See General Criteria – Conceptual Site Model sheets** to support distance to nearest surface water body.
- 5 = The specified concentrations are maximums, and typically occur in source area monitoring wells. **See General Criteria – Conceptual Site Model sheets** to support length of time plume has been stable or decreasing.
- 6 = The specified concentrations are maximums, and typically occur in source area monitoring wells. **See General Criteria – Conceptual Site Model sheets** to support dissolved benzene and MTBE concentrations.
- 7 = **See General Criteria – Conceptual Site Model sheets** to support Property Owner's willingness to accept Land Use Restrictions.
- a = Class 1: Represents a short, stabilized plume that is indicative of a small or depleted source and/or very high natural attenuation rate. (CA LUFT Manual)
- b = Class 2: Represents a moderate, stabilized plume length (plume boundary is <250 feet from point of release) that approximates the average benzene plume length from cited studies. The maximum concentration of benzene (3,000 µg/L) and MTBE (1,000 µg/L) in groundwater are conservative indicators that free product is not present. These concentrations are approximately 10% and 0.02%, respectively, of the typical effective solubility of benzene and MTBE in unweathered gasoline. (CA LUFT Manual)
- c = Class 3: Represents a moderate, stabilized plume length (plume boundary is <250 feet from point of release) that approximates the average benzene plume length from cited studies. The on-site free product and/or high dissolved concentrations in the plume remaining after secondary source removal to the maximum extent practicable as per the General Criteria in the Policy require that the plume has been stable or decreasing for a minimum of five years of monitoring to validate plume stability/natural attenuation (i.e., to confirm that the rate of natural attenuation exceeds the rate of LNAPL dissolution and dissolved-phase migration). (CA LUFT Manual)
- d = Class 4: Represents a long, stabilized plume length (plume boundary is <1,000 feet from point of release) that approximates the maximum MTBE plume length cited. (CA LUFT Manual)
- e = Class 5: For other low-threat site-specific scenarios not captured in Class 1 through 4, use a fate-and-transport model to evaluate the potential migration and attenuation of the chemicals using site-specific calibration data when available. It is important to use models that consider mass balance whenever possible. (CA LUFT Manual)
- NA = Not applicable

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

**Groundwater: Case Notes**

**Case File References (Document File Names):**

**Technical References:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

<b>Does the site qualify for the active commercial fueling facility exemption?</b> <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
<b>Does the site meet <u>one of the three</u> petroleum vapor intrusion to indoor air specific criteria (a, b, or c)?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE

**LTCP Statement:** “Exposure to petroleum vapors migrating from soil or groundwater to indoor air may pose unacceptable human health risks. This policy describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks. In many petroleum release cases, potential human exposures to vapors are mitigated by bioattenuation processes as vapors migrate toward the ground surface. For the purposes of this section, the term “bioattenuation zone” means an area of soil with conditions that support biodegradation of petroleum hydrocarbon vapors.

The low-threat vapor-intrusion criteria described below apply to sites where the release originated and impacted or potentially impacted adjacent parcels when:

- (1) existing buildings are occupied or may be reasonably expected to be occupied in the future, or
- (2) buildings for human occupancy are reasonably expected to be constructed in the future.

Appendices 1 through 4 (attached) illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario. Petroleum release sites shall satisfy the media-specific criteria for petroleum vapor intrusion to indoor air and be considered low-threat for the vapor-intrusion-to-indoor-air pathway if:

- a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, or all of the characteristics and criteria of scenario 4 as applicable; or
- b. A site-specific risk assessment for the vapor intrusion pathway is conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency; or
- c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health.

**Exception:** Exposures to petroleum vapors associated with historical fuel system releases are comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities. Therefore, satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.”

<b>Does the site qualify for an <u>exemption</u> from the Petroleum Vapor Intrusion to Indoor Air criteria?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the site is an active commercial petroleum fueling facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are release characteristics reasonably believed to pose an unacceptable health risk to facility users or nearby facilities?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>If the site <u>does not</u> qualify for an exemption, then</b>				
a. Do site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, <u>or</u> all of the characteristics and criteria of scenario 4? <b>-OR-</b> <i>(Use page vi-2 through vi-10 to support answer)</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted that demonstrates that human health is protected? <b>-OR-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
c. As a result of controlling exposure through the use of mitigation measures <u>or</u> through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use General Criteria e - Conceptual Site Model pages to support answer**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

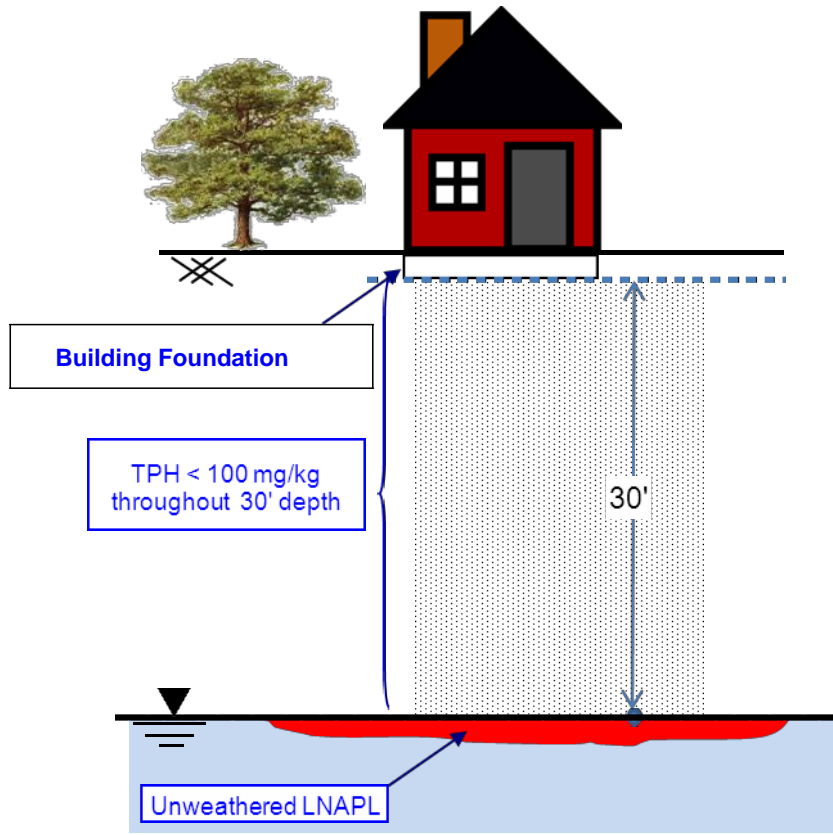
**SCENARIO 1 - UNWEATHERED LNAPL IN GROUNDWATER**

Do site specific conditions at the site satisfy all the characteristics of Scenario 1?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Scenario 1  
Existing Building or Potential Future Construction**

**LNAPL Characteristics:**  
Unweathered – petroleum product that has not been subjected to significant volatilization or solubilization, and therefore has not lost a significant portion of its volatile or soluble constituents (e.g., comparable to recently dispensed fuel)

**Bioattenuation Zone Required Characteristics:**  
Minimum 30 foot vertical separation distance between the bottom of building foundations and LNAPL in groundwater,  
Total TPH concentrations in soil < 100 mg/kg



Is the LNAPL unweathered?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet vertically</u> between the LNAPL in groundwater and the foundation of existing buildings?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet vertically</u> between the LNAPL in groundwater and the foundation of potential buildings?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are total TPH concentrations in soil less than 100 mg/kg throughout the entire vertical extent of the 30 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

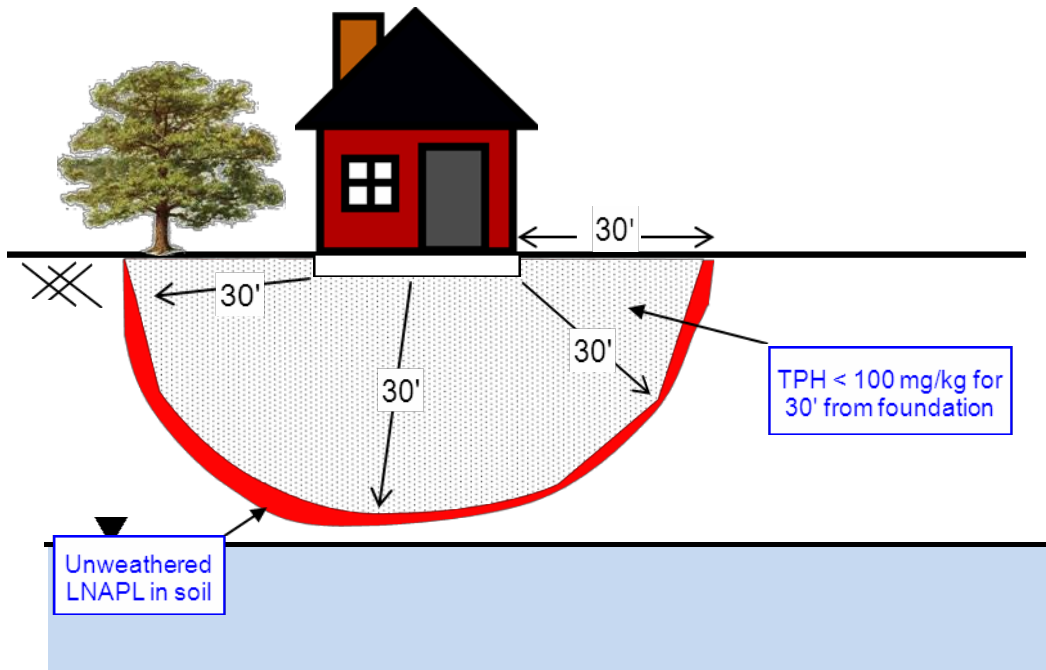
**SCENARIO 2 - UNWEATHERED LNAPL IN SOIL**

<b>Do site specific conditions at the site satisfy all the characteristics of Scenario 2?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Scenario 2  
Existing Building or Potential Future Construction**

**LNAPL Characteristics:**  
Unweathered – petroleum product that has not been subjected to significant volatilization or solubilization, and therefore has not lost a significant portion of its volatile or soluble constituents (e.g., comparable to recently dispensed fuel)

**Bioattenuation Zone Required Characteristics:**  
Minimum 30 foot vertical separation distance between the bottom of building foundations and LNAPL in soil,  
Total TPH concentrations in Soil < 100 mg/kg



Is the LNAPL unweathered?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet both laterally and vertically</u> between the LNAPL in soil and the foundation of existing buildings?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet both laterally and vertically</u> between the LNAPL in soil and the foundation of <u>potential buildings</u> ?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are total TPH concentrations in soil less than 100 mg/kg throughout the entire lateral and vertical extent of the 30 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 3 – LOW CONCENTRATION GROUNDWATER SCENARIO (FIGURE A)**

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 3 Figure A?

Y

N

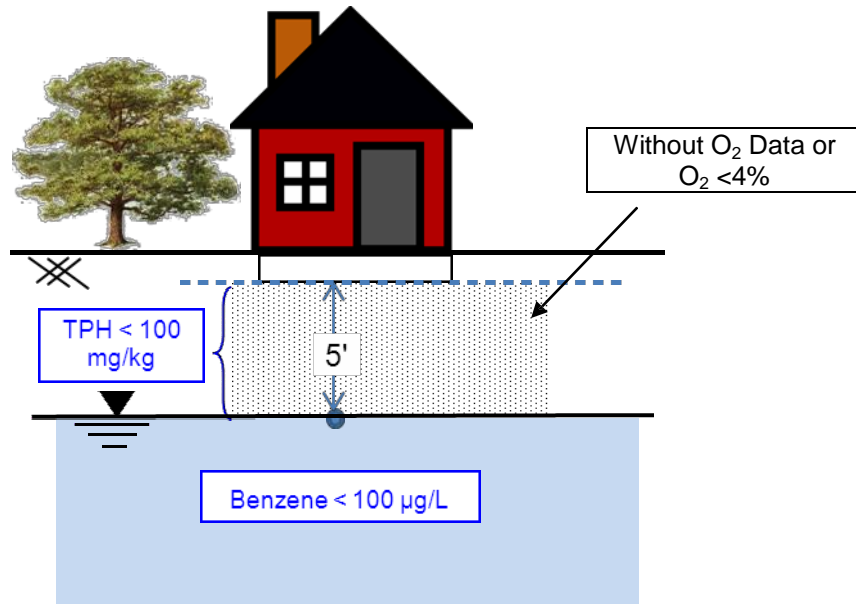
NE

NA

**Figure A  
Existing Building or Future Construction**

**Dissolved Phase Benzene Concentrations in Groundwater Requirements:**  
 $< 100 \mu\text{g/L}$

**Bioattenuation Zone Required Characteristics:**  
 Minimum 5 Foot Vertical Separation Distance between Bottom of Building Foundations and Water Table,  
 No Soil Gas Oxygen Data or Measured Soil Gas Oxygen Concentrations  $< 4\%$ ,  
 Total TPH Concentrations in Soil  $< 100 \text{ mg/kg}$



Are maximum dissolved benzene concentrations in groundwater $< 100 \mu\text{g/L}$ ? <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 5 feet vertically</u> between the dissolved phase benzene and the foundation of existing buildings? <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 5 feet vertically</u> between the dissolved phase benzene and the foundation of potential buildings? <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that Total TPH (TPH-g and TPH-d combined) concentrations in soil are $< 100 \text{ mg/kg}$ <u>throughout the entire depth</u> of the 5 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

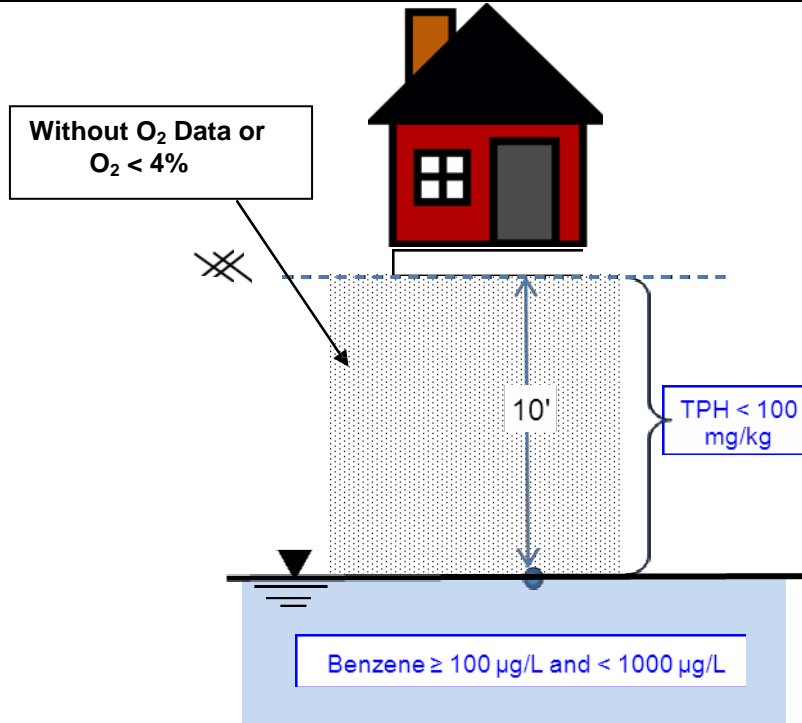
**SCENARIO 3 – LOW CONCENTRATION GROUNDWATER SCENARIO (FIGURE B)**

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 3 - Figure B?  Y  N  NE  NA

**Figure B  
Existing Building or Future Construction**

**Dissolved Phase Benzene Concentrations in Groundwater Requirements:**  
≥ 100 µg/L but < 1,000 µg/L

**Bioattenuation Zone Required Characteristics:**  
Minimum 5 Foot Vertical Separation Distance between Bottom of Building Foundations and Water Table,  
Measured Soil Gas Oxygen Concentrations < 4%,  
Total TPH Concentrations in Soil < 100 mg/kg



Are maximum dissolved benzene concentrations in groundwater ≥ 100 µg/L but < 1,000 µg/L?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of existing <b>buildings</b> ?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of <b>potential buildings</b> ?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that Total TPH (TPH-g and TPH-d combined) concentrations in soil are < 100 mg/kg <u>throughout the entire depth</u> of the 10 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable



**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 3 – LOW CONCENTRATION GROUNDWATER SCENARIO (FIGURE C)**

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 3 - Figure C?

Y

N

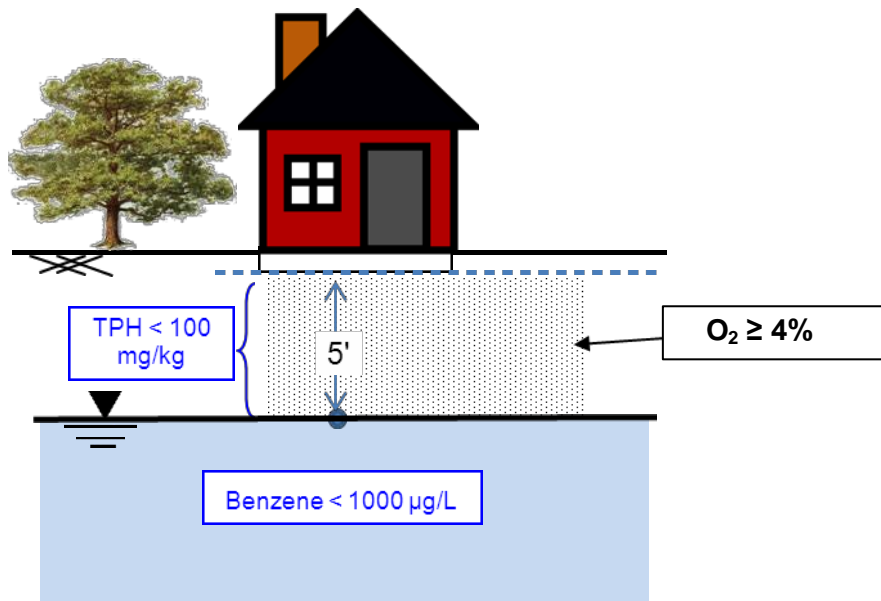
NE

NA

**Figure C  
Existing Building or Future Construction**

**Dissolved Phase Benzene Concentrations in Groundwater Requirements:**  
< 1,000 µg/L

**Bioattenuation Zone Required Characteristics:**  
Minimum 5 Foot Vertical Separation Distance between Bottom of Building Foundations and Water Table,  
Measured Soil Gas Oxygen Concentrations ≥ 4%,  
Total TPH Concentrations in Soil < 100 mg/kg



Are maximum dissolved benzene concentrations in groundwater ≥ 100 µg/L but < 1,000 µg/L?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of <u>existing buildings</u> ?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of <u>potential buildings</u> ?; <b>-and-</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that Total TPH (TPH-g and TPH-d combined) concentrations in soil are < 100 mg/kg <u>throughout the entire depth</u> of the 10 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS  
(WITH A BIOATTENUATION ZONE)**

<b>Does the Site Satisfy all of the Characteristics and Requirements of Scenario 4 – With Bioattenuation Zone?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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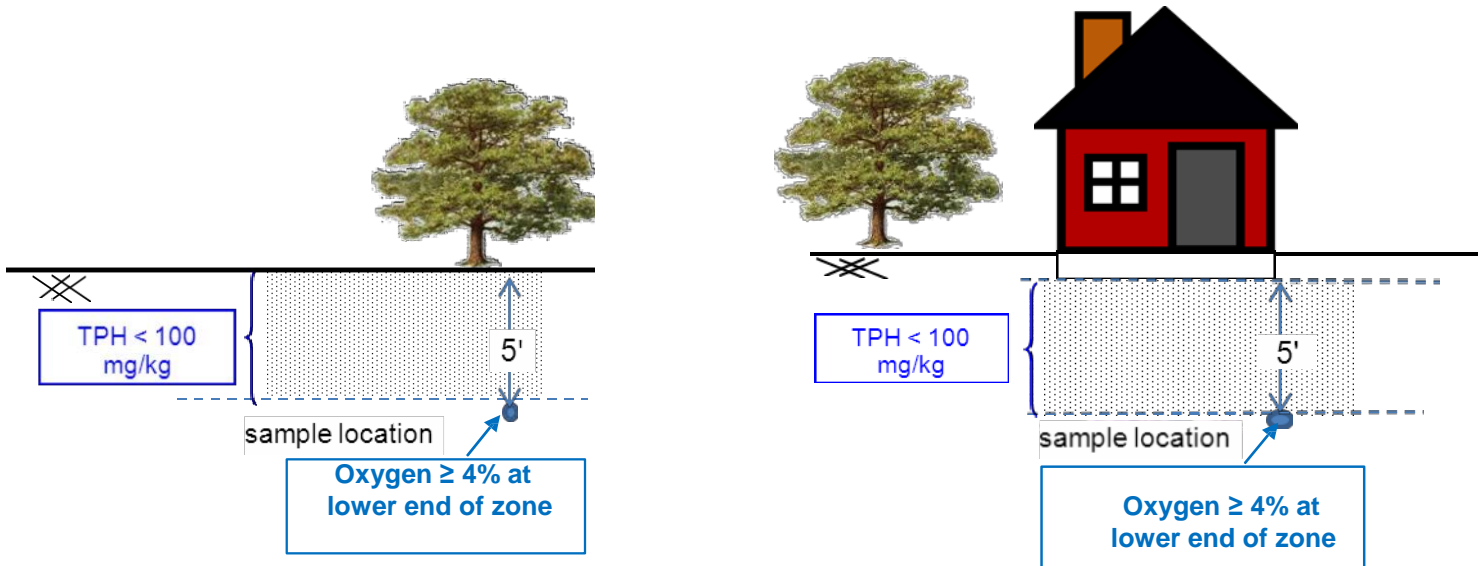
**Soil Gas Sampling – With Bioattenuation Zone  
Existing Building or Future Construction**

**Bioattenuation Zone Required Characteristics:**  
 Minimum 5 foot vertical feet of soil between the soil vapor measurement and the foundation of an existing building or ground surface of future construction;  
 Total TPH concentrations in soil < 100 mg/kg (measured in at least two depths within the five-foot zone);  
 Soil gas oxygen concentrations ≥ 4% at the bottom of the five-foot bioattenuation zone

**Soil Gas Sample Location Requirements:**  
 Existing Buildings - At least five feet below the bottom of the building foundation  
 Future Construction - The soil gas sample shall be collected from at least five feet below ground surface

**Existing Building**

**Future Construction**



<b>Are the required bioattenuation zone characteristics satisfied?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there a minimum 5 foot vertical feet of soil between the soil vapor measurement and the foundation of <u>existing buildings</u> ?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there a minimum 5 foot vertical feet of soil between the soil vapor measurement and the <u>ground surface of future construction</u> ?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that total TPH concentrations in soil are < 100 mg/kg (measured in at least two depths within the five-foot zone)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that soil gas oxygen concentrations are ≥ 4% at the bottom of the five-foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS (WITH A BIOATTENUATION ZONE)**

If the required bioattenuation zone characteristics have been met then,

<b>Have soil gas samples been collected in accordance with required protocols?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For existing buildings, were soil gas samples collected from at least five feet below the bottom of building foundations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For sites where future construction is planned, were soil gas samples collected from at least five feet below ground surface within the footprints of future buildings?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Were samples collected in accordance with the guidance provided in the CA LUFT Manual?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified <u>residential screening levels</u>?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 85,000 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 1,100,000 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 93,000 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified <u>commercial screening levels</u>?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 280,000 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 3,600,000 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 310,000 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

*Use Criteria e – Conceptual Site Model sheets to support answers*

If the required bioattenuation zone characteristics have not been satisfied then use Scenario 4 – No Bioattenuation Zone (pages vi-9 and vi-10)

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS  
(NO BIOATTENUATION ZONE)**

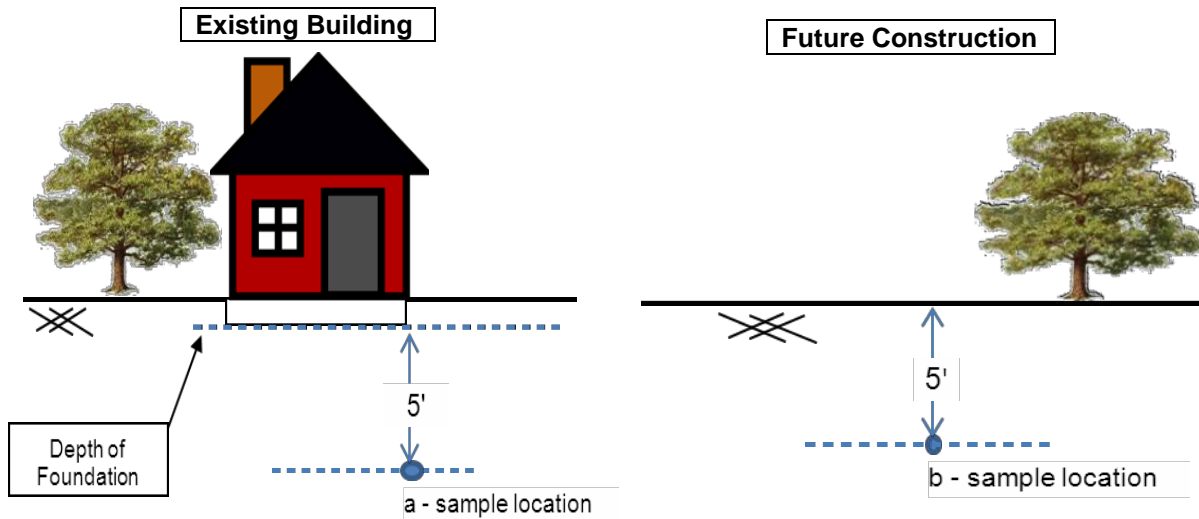
<b>Does the Site Satisfy all of the Characteristics and Requirements of Scenario 4 – No Bioattenuation Zone?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Soil Gas Sampling – No Bioattenuation Zone  
Existing Building or Future Construction**

**Soil Gas Sample Location Requirements:**

Existing Buildings – At least five feet below the bottom of the building foundation

Future Construction - The soil gas sample shall be collected from at least five feet below ground surface



<b>Were appropriate protocols followed for collecting soil gas samples?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For existing buildings, were soil gas samples collected from at least five feet below the bottom of building foundations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For sites where future construction is planned, were soil gas samples collected from at least five feet below ground surface within the footprints of future buildings?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Were samples collected in accordance with the guidance provided in the CA LUFT Manual?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified residential screening levels?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 85 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 1,100 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 93 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified commercial screening levels?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 280 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 3,600 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 310 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS  
(NO BIOATTENUATION ZONE)**

For the no bioattenuation zone scenario, the screening criteria provided in the table on the preceding page are the same as the California Human Health Screening Levels (CHSSLs) with engineered fill below sub-slab.

If building crawl space air samples were collected instead of soil gas samples to evaluate vapor intrusion into buildings, then

<b>Were appropriate protocols followed for collecting the crawl space air samples?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Were samples collected in accordance with the guidance provided in <i>the CA LUFT Manual</i> and referenced documents including the DTSC's <i>Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air</i> ?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been collected to determine that crawl space air concentrations for benzene, ethylbenzene, and naphthalene are below the appropriate residential screening levels (i.e., CHHSLs for Indoor Air)?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 0.084 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene – No screening number currently available	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 0.072 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been collected to determine that crawl space air concentrations for benzene, ethylbenzene, and naphthalene are below the appropriate commercial screening levels (i.e., CHHSLs for Indoor Air)?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 0.141 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene – No screening number currently available	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 0.120 µg/m <sup>3</sup>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use Criteria e – Conceptual Site Model sheets to support answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**Case Notes**

**Case File Document References:**

**Technical References:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**Case Notes**

**Case Notes (continued):**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: DIRECT CONTACT AND OUTDOOR AIR EXPOSURE**

<b>Does the site qualify for an <u>exemption</u> from the media-specific criteria for Direct Contact and Outdoor Air Exposure? -OR-</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NE
<b>Does the site meet the media-specific criteria for Direct Contact and Outdoor Air Exposure?</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NE

**LTCP Statement:** “This policy describes conditions where direct contact with contaminated soil or inhalation of contaminants volatilized to outdoor air poses a low threat to human health. Release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if they meet any of the following:

- Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs). The concentration limits for 0 to 5 feet bgs protect from ingestion of soil, dermal contact with soil, and inhalation of volatile soil emissions and inhalation of particulate emissions. The 5 to 10 feet bgs concentration limits protect from inhalation of volatile soil emissions. Both the 0 to 5 feet bgs concentration limits and the 5 to 10 feet bgs concentration limits for the appropriate site classification (Residential or Commercial/Industrial) shall be satisfied. In addition, if exposure to construction workers or utility trench workers is reasonably anticipated, the concentration limits for Utility Worker shall also be satisfied; or
- Maximum concentration of petroleum constituents in soil are less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health; or
- As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health.”

<b>Has adequate data been collected to demonstrate that the upper 10 feet of soil is free of petroleum contamination and therefore qualifies for the exemption?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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<b>If the site does not qualify for the exemption, then does the site satisfy the media-specific criteria (a, b, <u>or</u> c) for direct contact and outdoor air exposure?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth bgs? <i>Use page dc-2 to support answer</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
b. Are the maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

**Use General Criteria e – Conceptual Site Model sheets to support your answers**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable



**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: DIRECT CONTACT AND OUTDOOR AIR EXPOSURE**

**Maximum Concentrations of Petroleum Constituents in Soil (Scenario a)**

**Table 1 – Concentrations of Petroleum Constituents in Soil  
That will Have No Significant Risk of Adversely Affecting Human Health**

Chemical	Residential		Commercial/Industrial		Utility Worker
	0 to 5 ft bgs (mg/kg)	5 to 10 ft bgs (mg/kg)	0 to 5 ft bgs (mg/kg)	5 to 10 ft bgs (mg/kg)	0 to 10 ft bgs (mg/kg)
<b>Benzene</b>	1.9	2.8	8.2	12	14
<i>Max Soil Conc<sup>1</sup></i>					
<b>Ethylbenzene</b>	21	32	89	134	314
<i>Max Soil Conc<sup>1</sup></i>					
<b>Napthalene</b>	9.7	9.7	45	45	219
<i>Max Soil Conc<sup>1</sup></i>					
<b>PAH<sup>2</sup></b>	0.063	NA	0.68	NA	4.5
<i>Max Soil Conc<sup>1</sup></i>					

Notes:

1. The maximum concentrations of petroleum constituents in soil should be compared to those listed in Table 1 (Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways, SWRCB)
2. Based on the seven carcinogenic poly-aromatic hydrocarbons (PAHs) as benzo(a)pyrene toxicity equivalent [BaPe]. Sampling and analysis for PAHs is only necessary where soil is affected by either waste oil or Bunker C oil.

<b>Are all the concentration limits for <u>all</u> the appropriate site classification satisfied?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Residential: 0 to 5 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Residential: 5 to 10 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Commercial/Industrial: 0 to 5 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Commercial/Industrial: 5 to 10 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Utility Worker: 0 to 10 feet bgs?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Have the requirements for using the screening levels in Table 1 been satisfied (i.e., have the model assumptions presented in the SWRCB document entitled “Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways” been met?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the area of impacted soil where a particular exposure occurs ≤ 82 feet by 82 feet?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the receptor located at the downgradient edge for inhalation exposure?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the wind speed < 2.25 meters per second (7.38 feet per second) on average?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are there different exposure scenarios than residential, commercial/industrial, utility worker) at the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY  
MEDIA SPECIFIC CRITERIA: DIRECT CONTACT AND OUTDOOR AIR EXPOSURE**

**Direct Contact and Outdoor Air Exposure: Case Notes**

**Case File Reference Documents:**

**Technical References:**

**Case Notes:**

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable

**CONCEPTUAL SITE MODEL  
AND DATA GAP IDENTIFICATION CHECKLIST**

**Well Survey**

<b>Are there existing water supply wells or other sources of water in the vicinity of the site?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a recent well survey been conducted to identify all wells within 2,000 feet of the site? Name, author, and date of survey document: <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have Department of Water Resources records been reviewed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have Zone 7 Water Agency records been reviewed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have Alameda County Public Works records been reviewed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a background study of the historical land uses of the site and properties in the vicinity of the site been conducted to determine the existence of unrecorded/unknown (abandoned) wells?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Has sufficient data been provided on all wells located within 2,000 feet of the site to identify sensitive receptors and determine potential contaminant migration pathways to and from the site?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a figure (with rose diagram) identifying each well location been presented?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have DWR well logs (marked as confidential) been provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a table with details of the well search been provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Identification number (ID) corresponding to the well location on a figure?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
State Well ID, Well Owner ID?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well location address?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Distance of well from the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Direction of well from the site (downgradient, upgradient, crossgradient)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Type of well (monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, cathodic protection)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well status (active, inactive, decommissioned, unrecorded, and/or abandoned)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well installation date?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well decommissioned date?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Total Well depth (feet bgs)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well screen interval (feet bgs)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well seal interval (feet bgs)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well diameter (inches)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<b>Are these supply wells or other sources of water used by property owners/tenants in the vicinity of the site?</b>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a neighborhood backyard domestic water/irrigation well assessment been conducted?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have wells been impacted by the release site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have the wells been sampled for chemicals of concern associated with the release site and analytical results been provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have impacted wells been decommissioned and well destruction records provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation    ■ NA = Not Applicable    ■ UNK = Unknown



**DWR WELL SEARCH TABLE**  
**AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California**

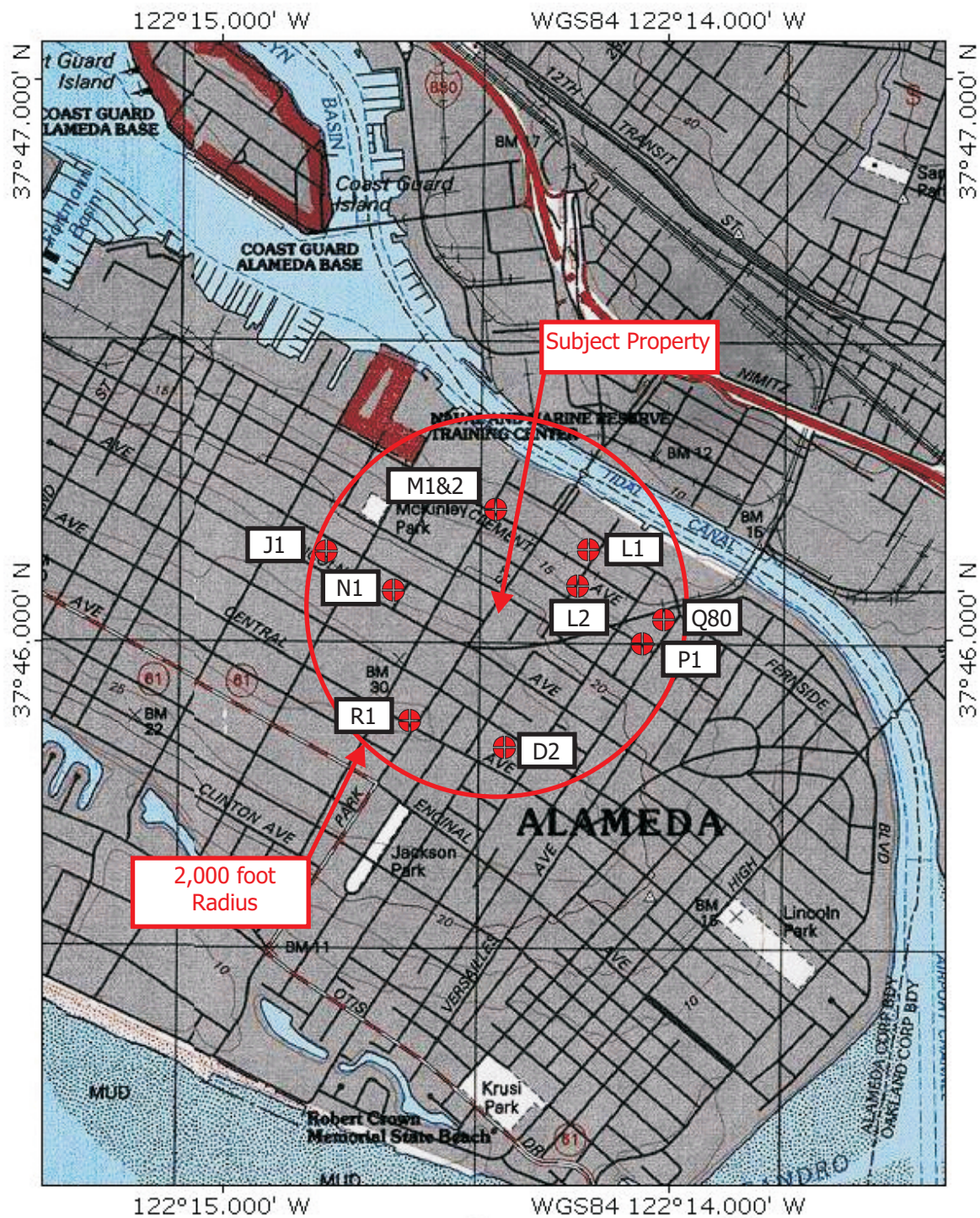
TOWNSHIP	RANGE	SECTION	WELL DESIGNATION	DIRECTION	DISTANCE (FEET)	ADDRESS	TOTAL (feet)	INDICATED USE	DRILL DATE	
<b>02 SOUTH</b>	<b>03 WEST</b>	<b>7</b>								
02 SOUTH	03 WEST	7	M1	SOUTHEAST	4,600	3229 FERNSIDE BLVD	71	INDUSTRIAL	4/77	
02 SOUTH	03 WEST	7	M2	SOUTHEAST	4,600	3229 FERNSIDE BLVD	80	INDUSTRIAL	4/77	
02 SOUTH	03 WEST	7	P2	SOUTHEAST	1,100	2538 LINCOLN AVENUE	17	IRRIGATION	8/78	
02 SOUTH	03 WEST	7	Q1	SOUTHEAST	2,100	1819 VERSAILLES AVENUE	22	IRRIGATION	10/77	
02 SOUTH	03 WEST	7	Q1	SOUTHEAST	2,300	FERNSIDE BLVD AND VERSAILLES AVE	76	CATHODIC PROTECTION	11/76	
02 SOUTH	03 WEST	7	Q8	SOUTHEAST	2,100	1708 VERSAILLES AVENUE	60	UNKNOWN	7/88	
<b>02 SOUTH</b>	<b>04 WEST</b>	<b>12</b>								
02 SOUTH	04 WEST	12	D2	NORTHWEST	7,200	1521 BUENA VISTA	200	INDUSTRIAL	6/89	
02 SOUTH	04 WEST	12	J1	NORTHWEST	2,000	2139 PACIFIC AVENUE	28.5	IRRIGATION	7/74	
02 SOUTH	04 WEST	12	L1	NORTHWEST	4,400	1810 CENTRAL	67	IRRIGATION	7/77	
02 SOUTH	04 WEST	12	M1	NORTHWEST	6,000	1401 F COTTAGE STREET	70	IRRIGATION	6/77	
02 SOUTH	04 WEST	12	N1	SOUTHWEST	6,300	1622 DAYTON AVENUE	60	IRRIGATION	4/77	
02 SOUTH	04 WEST	12	P1	SOUTHWEST	5,400	1016 GRAND STREET	60	IRRIGATION	2/77	
02 SOUTH	04 WEST	12	P2	SOUTHWEST	5,400	1012 GRAND STREET	19	IRRIGATION	2/77	
02 SOUTH	04 WEST	12	P3	NORTHWEST	3,700	1538 LAFAYETTE STREET	23	IRRIGATION	6/77	
02 SOUTH	04 WEST	12	P4	SOUTHWEST	4,800	1820 SAN ANTONIO AVENUE	19	IRRIGATION	8/77	
02 SOUTH	04 WEST	12	P6	SOUTHWEST	5,500	1000 GRAND STREET	70	IRRIGATION	9/77	
02 SOUTH	04 WEST	12	Q2	SOUTHWEST	3,400	2037 ALAMEDA AVENUE	20	IRRIGATION	2/77	
02 SOUTH	04 WEST	12	Q3	SOUTHWEST	3,700	2016 ALAMEDA AVENUE	50	IRRIGATION	7/77	
02 SOUTH	04 WEST	12	Q4	SOUTHWEST	3,200	1215 WILLOW STREET	21.5	IRRIGATION	3/77	
02 SOUTH	04 WEST	12	R2	SOUTHWEST	2,800	2121 ALAMEDA AVENUE	20	IRRIGATION	2/77	
02 SOUTH	04 WEST	12	R3	SOUTHWEST	3,000	2120 ALAMEDA AVENUE	20	IRRIGATION	2/77	
02 SOUTH	04 WEST	12	R4	SOUTHWEST	3,800	2060 SAN ANTONIO AVENUE	30	IRRIGATION	5/77	
<b>02 SOUTH</b>	<b>04 WEST</b>	<b>13</b>								
			-- NO RECORDS --							
<b>02 SOUTH</b>	<b>04 WEST</b>	<b>18</b>								
02 SOUTH	03 WEST	18	B1	SOUTHEAST	2,500	2928 NORTHWOOD DRIVE	55	IRRIGATION	5/77	
02 SOUTH	03 WEST	18	B3	SOUTHEAST	2,800	2936 GIBBONS DRIVE	40	IRRIGATION	8/77	
02 SOUTH	03 WEST	18	D1	SOUTHWEST	2,200	2518 CHESTER STREET	20	IRRIGATION	5/77	
02 SOUTH	03 WEST	18	F1	SOUTHEAST	2,715	2806 VAN BUREN STREET	20	--	5/77	
02 SOUTH	03 WEST	18	J1	SOUTHEAST	6,000	1522 EASTSHORE DRIVE	17	IRRIGATION	5/77	
02 SOUTH	03 WEST	18	M2	SOUTHWEST	4,000	1101 COLLEGE AVENUE	40	IRRIGATION	6/88	
02 SOUTH	03 WEST	18	N3	SOUTHWEST	5,000	2812 OTIS DRIVE	40	IRRIGATION	10/77	
02 SOUTH	03 WEST	18	P1	SOUTHEAST	5,200	1033 POST STREET	50	IRRIGATION	--	

NOTES:

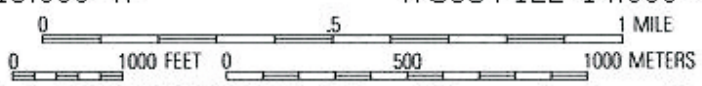
- Department of Water Resources (DWR) records provided on 1/30/2012.
- Wells associated with groundwater monitoring or remediation were excluded.
- Wells which were unidentifiable were excluded.

**ACDPW Well Search Table**  
**AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California**

<b>Well Designation</b>	<b>Township / Range</b>	<b>Section, Parcel and Number</b>	<b>Direction</b>	<b>Distance (feet)</b>	<b>Address</b>	<b>Total Depth (feet)</b>	<b>Reported Well Use</b>	<b>Drill Date</b>
L1	2S/3W	7L1	Northeast	1,350	1915 EVERETT ST	90	Abandoned	Unknown
P1	2S/3W	7P1	East	1,750	2623 EAGLE AVE	120	Cathodic Protection	6/76
Q80	2S/3W	7Q80	East	1,900	1823 PEARL ST	11	Unknown	10/96
D2	2S/3W	18D2	South	1,400	EVERETT & ALAMEDA	120	Cathodic Protection	7/76
R1	2S/4W	12R1	Southwest	1,400	CENTRAL & OAK ST	325	Domestic	Unknown
M1	2S/3W	7M1	North	1,200	2307 CLEMENT AVE	72	Industrial	4/77
M2	2S/3W	7M2	North	1,200	2307 CLEMENT AVE	82	Industrial	4/77
L2	2S/3W	7L2	East	1,100	1819 EVERETT ST	Unknown	Irrigation	/06
N1	2S/3W	7N1	West	1,000	2235 LINCOLN AVE	206	Irrigation	/16
J1	2S/4W	12J1	West	1,950	2138 PACIFIC AVE	29	Irrigation	8/77



TN / MN  
15°



Map created with TOPO!® ©2003 National Geographic ([www.nationalgeographic.com/topo](http://www.nationalgeographic.com/topo))

WELL



## WELL SEARCH LOCATION MAP

1600 Park Street, Alameda, California **FIGURE 9**

Project Number: 298931



Conceptual Site Model - Updated May 2013  
Former Good Chevrolet  
1600 Park Street - Parcel A  
Alameda, CA

SCM Element	SCM Sub-Element	Description	Figures & Tables Reference	Data Gap	How to Address Data Gap
Geology & Hydrogeology	Regional	The site is located on Alameda Island. The near surface sediments of the area are mapped as Holocene and Pleistocene Merritt Sands (Qms) deposits (Helley, et al). Depth to bedrock is estimated at 300 to 800 feet below land surface (Norfleet Consultants, 1998). According to information obtained from the U.S Geological Survey (USGS), the site is located at between 20 and 25 feet above mean sea level (amsl) with the local topography sloping gently to the northeast.	Figure 1	None	n/a
	Site	<p><b>Geology:</b> Based on the logs of soil borings drilled at the site by AEI, sediments across the site are fairly consistent; consisting primarily of poorly graded fine to medium sand with varying clay and silt content to a depth of at least 15 feet bgs, the maximum depth explored. Logs completed during the July 2011 site investigation were consistent with observations observed during extensive drilling work to the north (Parcel B).</p> <p><b>Hydrology:</b> During the drilling conducted by AEI in 2011-12, groundwater was first observed in the temporary direct push borings at depths of approximately 9 to 11 feet bgs and stabilized at between approximately 7.5 to 8.5 feet bgs. The remaining hydrogeology information is based on findings at Parcel B. The depth to water in the groundwater monitoring wells has generally ranged from approximately 7.5 to 9.5 feet bgs since the wells were installed. Based on the groundwater monitoring conducted at the site, groundwater flows fairly consistently in a northwesterly direction at an approximate hydraulic gradient of <math>1 \times 10^{-2}</math> to <math>2 \times 10^{-2}</math> ft/ft. and exists as an unconfined aquifer.</p> <p>Based upon observations made during excavations at the former UST-hold and hydraulic lifts, transitivity (T) and hydraulic conductivity (K) appear to be low. Excavations up to 15 feet bgs which were left open for several hours did not produce appreciable volumes water. Additional evidence for low T and K values is the small size of the hydrocarbon plume at Parcel B (adjacent north) which has reached an apparent length of approximately 160 feet from the source since the conservative release date of 1986 (26 years).</p>	<p>August 16, 2011 Phase II Subsurface Investigation Report. February 3, 2012</p> <p>Corrective Action Plan, December 7, 2012 Conceptual Site Model Update - November 2012.</p>	None	n/a
Surface Water Bodies		The nearest surface water body is the tidal canal located approximately 1500 to 2000 feet to the northeast.	Figure 1	None	n/a
Nearby Wells		<p>In January 2012, a 2,000-foot radius well search was requested and received from the Alameda County Department of Public Works (ACDPW) and the Department of Water Resources (DWR). The results of the well search were reviewed and wells which appeared to be associated with monitoring or remediation at other sites or soil borings were excluded from the review.</p> <p>According to the results of the DWR well search, two (2) wells are located within 2,000 feet of the site. One well was located approximately 1,100 feet to the southeast (upgradient) and one well was located approximately 2,000 feet to the northwest (downgradient). Both wells were reportedly used for irrigation and installed to a depth of less than 30 feet bgs. Based on the 2008 groundwater sampling from the soil borings and cumulative groundwater monitoring data, it appears that the length of the plume at the site is no more than approximately 160 feet in length. None of the wells noted in this well search are located within the expected plume length for this site. As such, none of the listed wells are expected to be impacted by the hydrocarbons at the site.</p> <p>According to the results of the ACDPW well search, ten (10) wells are located within 2,000 feet of the site. The nearest well was located approximately 1,000 feet to the west (cross-gradient). Each of the remaining wells were located at a distance further than 1,000 feet and none of the wells were located in the immediate downgradient direction (northwest). None of the wells noted in this well search are located within the expected plume length for this site. As such, none of the listed wells are expected to be impacted by the hydrocarbons at the site.</p>	<p>February 3, 2012 Corrective Action Plan: Section 3.6</p> <p>March 30, 2012 Subsurface Investigation and Well Installation Report: Section 9.0.</p>	None	n/a



Conceptual Site Model - Updated May 2013  
Former Good Chevrolet  
1600 Park Street - Parcel A  
Alameda, CA

SCM Element	SCM Sub-Element	Description	Figures & Tables Reference	Data Gap	How to Address Data Gap
Potential Source(s)	On Site (PARCEL A)	<p><b>Former Waste Oil UST (Eastern portion of site):</b> One 550-gallon waste oil UST at the eastern portion of the site was removed in November 2011. Based on soil and groundwater analytical data from samples collected in and near the waste oil UST tank hold, a minor release appears to have occurred, primarily consisting of heavy range hydrocarbons (diesel and petroleum and grease). The release was limited to soil from beneath the UST which was over-excavated and disposed of at a Class I facility. Post-excavation sampling did not contain elevated hydrocarbons in the soil. Adjacent groundwater sample did not contain hydrocarbons at or above laboratory detection limits.</p> <p><b>Former USTs (Eastern portion of site):</b> One 10,000-gallon gasoline UST, one 4,000-gallon gasoline UST at the eastern portion of the site were removed in November 2011. Based on soil and groundwater analytical data from samples collected in and near the USTs, a minor release appears to have occurred, primarily consisting of gasoline constituents and limited to groundwater inside the UST cavity. Petroleum hydrocarbons were not detected in the soil samples beneath the USTs and dispenser islands. Adjacent groundwater samples collected both in the down gradient direction (AEI-14) and up gradient direction (AEI-15) did not contain detectable concentrations of hydrocarbons.</p> <p><b>Potential Former USTs (Southwestern portion of site):</b> Historical Sanborn maps indicate that a gas and oil area was present in the southwestern portion of the site. A geophysical survey completed in July 2011 did not indicate the presence of the USTs. Therefore it is unknown if USTs associated with the "gas and oil" notation ever existed or were removed. Three borings advanced in July 2011 (AEI-17 to AEI-19) were completed in the location of the former "gas and oil" notation on the Sanborn map. Elevated concentrations of hydrocarbons were not detected in the soil samples collected, and one boring contained low levels of residual hydrocarbons in the groundwater (AEI-17).</p> <p><b>Hydraulic Lifts &amp; Repair Area:</b> A total of 4 former underground hydraulic lifts were identified within the Parcel A area. All lifts were removed intact in July 2012 and no obvious contamination was observed. Investigation of these lift locations and in July 2011 did not identify significant releases of hydraulic oil range hydrocarbons adjacent to the lifts.</p>	<p>August 16, 2011 Phase II Subsurface Investigation Report.</p> <p>February 16, 2012 Underground Storage Tank Removal Report.</p>	None	n/a
Potential Source(s)	Off Site	<p><b>1650 Park St:</b> According to records on file with the ACEH, one 100-gallon waste oil UST and one 550-gallon gasoline UST were removed from the property in 1995 and 233 tons of soil were excavated and disposed at BFI Landfill in Livermore, California. Following soil removal and groundwater sampling, ACEH granted case closure in 2001. Based on onsite groundwater flow direction and case closure status of 1650 Park St, this site is not a source of impact to the subject site.</p> <p><b>Former USTs (Parcel B):</b> One 300-gallon waste-oil underground storage tank (UST) and one 500-gallon gasoline UST were removed from adjacent to the northern side of the building in 1986 at which time a release of petroleum hydrocarbons, primarily gasoline, was discovered. Based on onsite groundwater flow direction and hydrocarbon distribution at the site, this source is not a source of impact to Parcel A. Recent soil vapor sampling conducted on both Parcel A and B show that potential vapor from Parcel B does not affect Parcel A</p> <p><b>Hydraulic Lifts &amp; Repair Area (Parcel B):</b> A total of six former underground hydraulic lifts were identified within the northern building on Parcel B. Investigation of these lift locations and associated drain features in July 2011 identified releases of hydraulic oil range hydrocarbons near five (5) of the lifts in the northeastern end of the building. All lifts have since been removed with contaminated soil boring excavated and no significant impact was identified in the other lift areas or near the drain features investigated. These lifts are down-gradient of parcel A and lack any volatile contaminants, therefore do not pose a potential impact to Parcel A.</p> <p><b>Former Paint Booth (Parcel B):</b> A paint booth was identified in a 1950 Sanborn map. Soil boring AEI-27 was drilled in this location in Jan. 2012; no significant release was identified.</p> <p><b>Other nearby LUST Cases:</b> Several nearby LUST cases are identified on GeoTracker, including 1541 Park St, 1700 Park St, and 1701 Park St. Based on documented groundwater flow direction at the site, regulatory status of these cases, and/or the configuration of their plumes, these sites do not appear to be source of impact to the subject site.</p>	<p>April 13, 2001 Case Closure Letter from ACHCS; GeoTracker ACEH website</p>	None	n/a

Conceptual Site Model - Updated May 2013  
Former Good Chevrolet  
1600 Park Street - Parcel A  
Alameda, CA

SCM Element	SCM Sub-Element	Description	Figures & Tables Reference	Data Gap	How to Address Data Gap
Release Occurrence	Gasoline USTs	The release of TPH-g, BTEX, and other gasoline constituents originated from the former 10,000 gallon and 4,000 gallon gasoline UST system removed in 2011 from near the eastern side of the former building. The exact cause of the release is not known, though typically such releases occur from failures of the UST itself or the associated piping and pump system. The timing, duration and volume of the release are unknown. Soil and groundwater samples collected from adjacent to the UST system (AEI-14) indicate that the release from the UST system was limited.	August 16, 2011 Phase II Report. & February 16, 2012 UST Removal Report.	None	n/a
	Waste-Oil UST	The release of heavy range hydrocarbons and other waste oil constituents originated from the former 550 gallon waste oil UST which was removed in 2011 from near the eastern side of the former building. The exact cause of the release is not known, though typically such releases occur from failures of the UST itself or the associated piping. The timing, duration and volume of the oil release are unknown.  Confirmation soil samples collected in 2011 following excavation of the former UST-hold in, showed non-detectable concentrations of hydrocarbons indicating that the contamination was successfully removed during over-excavation activities and that the release from that waste oil UST was not significant.	August 16, 2011 Phase II Report. & February 16, 2012 UST Removal Report.	None	n/a
	Oil and Gas Area	The detection of heavy range hydrocarbons from the former oil and gas area in the southwestern portion of the site was limited to one boring AEI-17. The exact cause of the release is not known. Given the limited solubility, mobility, and volatility of heavy range hydrocarbons, the presence at this concentration is not significant.	August 16, 2011 Phase II Report.	None	n/a
	Hydraulic Lifts	The source of the heavier range hydrocarbons detected in groundwater from AEI-10 (TPHmo) appears to be from the former hydraulic lifts at the southern end of the former building. Again, the timing, duration and volume of the oil release are unknown, but appear relatively localized based on low detections and absence of concentrations in nearby borings AEI-1, AEI-2, and AEI-9, as well as the absence of TPHmo in the soil of AEI-10.	See Previous Reports	None	n/a
Constituents of Concern		The primary contaminants of concern are gasoline and gasoline constituents [TPH-g, benzene, toluene, ethylbenzene, and xylenes (BTEX)] from the gasoline UST release. MTBE has not been detected during sampling nor have detectable concentrations of fuel oxygenates been found.  Heavier hydrocarbons (reported as TPH-d and TPH-mo) have been detected in the area of the hydraulic lifts and USTs. PCBs have not been analyzed from beneath the hydraulic lifts associated with the Parcel A site. This is due to the fact that PCBs were analyzed for within the soil samples from areas containing known hydraulic oil contamination within Parcel B. PCBs were not detected in the soil samples from AEI-3, AEI-4, AEI-6, AEI-7, AEI-8 (Parcel B).  Cadmium, chromium, lead, nickel, and zinc have been detected at background concentrations in select soil samples. Nickel and zinc were detected in one groundwater sample with zinc slightly above the ESL.	Tables 1, 2, 5, 7 (soil); Tables 3, 4, 6, 7 (water).	None	n/a (see above for discussion of waste-oil UST constituents)

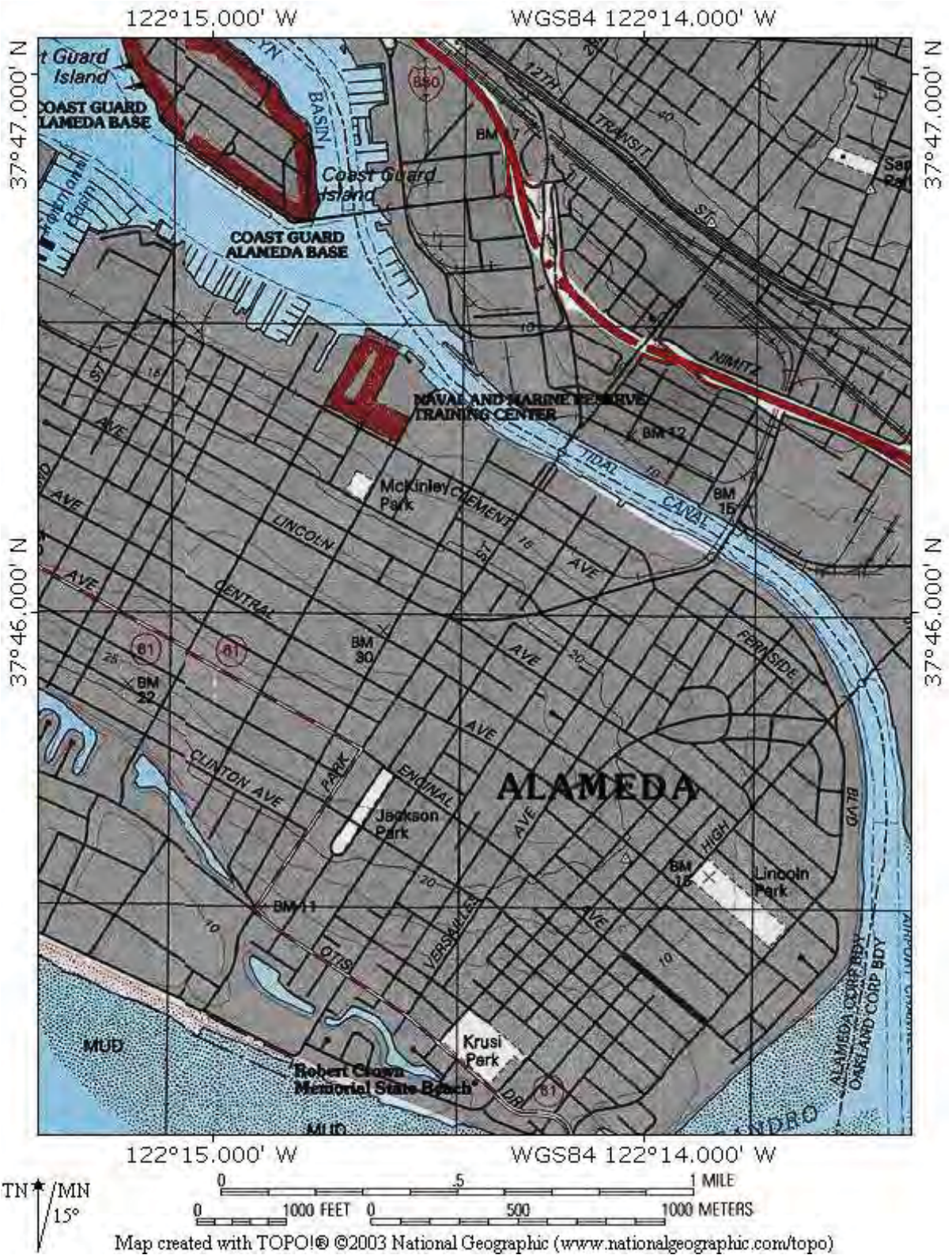
Conceptual Site Model - Updated May 2013  
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1600 Park Street - Parcel A  
Alameda, CA

SCM Element	SCM Sub-Element	Description	Figures & Tables Reference	Data Gap	How to Address Data Gap
Nature and Extent of Impacts	Impacts in Soil	<p>In the southwestern portion of the site, soil samples collected did not contain TPHg, TPHd, TPHmo, BTEX, or MTBE at or above the laboratory detection limit with the exception of TPHd which was detected in AEI-17 at a concentration of 1.1 mg/kg, well below the ESL of 83 mg/kg. Therefore, no evidence of petroleum impact in the soil is present. No further investigation is needed.</p> <p>Soil sampling during the gasoline UST removal activities did not detect TPHg, BTEX, and MTBE above the laboratory detection limit in bottom samples of the UST cavity and dispenser islands. Sidewall samples were not collected at the direction of the county, however the 7' sample from AEI-14 and 15, and 3.5 foot samples from D1 and D2, delineate the lateral extent of hydrocarbons in the soil in the shallower area of the USTs. Metals analyzed from the bottom samples did not exceed ESLs. No further investigation relating to the soil near the gasoline UST is recommended.</p> <p>Soil sampling during the waste oil UST removal activities indicated evidence of waste oil release at 9' bgs due to the presence of TPHg, TPHd, and TPHmo. Soil was excavated to 11 feet in order to remove the impacted soil and the confirmation soil sample collected at 11' bgs was below detection limits for TPH multi-range and VOCs. Metals were not detected above the ESLs. No further investigation relating to the waste oil UST is recommended.</p>	Figure 3 Tables 1, 2, 5 and 7 Boring Logs	None	n/a
	Impacts in Groundwater	<p>In the southwestern portion of the site, groundwater samples did not contain TPHg, BTEX, or MTBE at or above the laboratory detection limits. Heavy range hydrocarbons measured as TPHd and TPHmo were detected in the northernmost boring only (AEI-17) at 89 ug/L and 590 ug/L, respectively. These low concentrations indicate that an oil source may be present in the area in the southwestern portion of the site. However, the concentrations are relatively low (&lt;600 ug/L) and should not require additional sampling.</p> <p>TPHmo was reported in one sample (AEI-10) at a concentration of 400 ug/L in the area of the hydraulic lifts. Nearby samples did not contain elevated concentrations of TPHmo as TPHmo in the downgradient direction of AEI-10 did not detect TPHmo, but detection limit was above the ESL. Although the detection limits exceed the ESL, again, motor 400 ug/L or less would not justify additional investigation.</p> <p>The grab groundwater sample from the gasoline UST cavity (GW-1) contained elevated concentrations of TPHg and BTEX. AEI-14, located adjacent to and down-gradient of the gasoline UST cavity and AEI-15 located upgradient of the UST cavity did not contain TPH or BTEX at or above the laboratory detection limit. Based on this, the petroleum plume in groundwater is limited to within the former UST cavity.</p>	Figure 4; Tables 3, 4, 6, 7.	None	n/a
	Impacts in Vapor Phase	<p>Two soil vapor samples (SV-1 and SV-2) were collected on April 16, 2013 from the northeastern extent of the proposed building at the site - nearest the offsite source area (Parcel B). The samples were collected at a depth of 5 feet bgs. Constituents of concern were not detected at or above the laboratory detection limit in each of the soil vapor samples. Therefore, it has been determined that vapor phase impacts do not exist at the site.</p>	n/a	None	n/a

Conceptual Site Model - Updated May 2013  
Former Good Chevrolet  
1600 Park Street - Parcel A  
Alameda, CA

SCM Element	SCM Sub-Element	Description	Figures & Tables Reference	Data Gap	How to Address Data Gap
Migration Pathways	Preferential Pathways / Conduits	<p>A conduit study was conducted for the major underground utilities near the site (See Subsurface Investigation and Well Installation Report, 3/30/12) and a previous but incomplete study was provided in a correspondence dated June 6, 2008 from Blymyer Engineers, Inc. Information regarding the utilities was obtained from multiple sources. With the exception of the sanitary sewer in the center of Park St, all other underground utilities did not intersect the water table and are not preferential conduits to dissolved phase plume migration. All existing onsite utilities have been recently removed or will be removed prior to development.</p> <p>Information about the sanitary sewer lines was provided by the APWD. The maps provided by the APWD indicate that a 10-inch sanitary sewer line runs along the middle of Park Street and that the line is between 10.3 and 11.3 feet deep. The depth to water in the groundwater monitoring wells has generally ranged from approximately 7.5 to 9.5 feet bgs. As such, it appears that the 10-inch sanitary sewer line intersects groundwater near the site. However, general construction practice at the time of the sanitary sewer installation (over 50 years ago) included installing gravel with compacted sand on top of the gravel. Over the course of over 50 years, the sand will have settled into the gravel pore space resulting in a permeability similar to what is seen at the site (sands). Therefore, increased permeability would not be observed between site conditions and the sanitary sewer and the sewer line is not considered a preferential pathway.</p> <p>New utilities proposed at the site (Figure 5) will not be installed to depths at or below groundwater, with the exception of the sanitary sewer line which may potentially be installed below groundwater. In the event that the sanitary sewer is installed below groundwater, the utility corridor will be backfilled with less permeable fill than present at the site, therefore avoiding a preferential pathway.</p>	March 30, 2012 Subsurface Investigation and Well Installation Report: Section 8.0; Figure 5	None	n/a
Potential Receptors & Risks	On Site	Potable water is and will be provided by municipal sources for the foreseeable future, therefore direct contact with groundwater is not considered. Potential receptors at the site could include future construction workers who could come into contact with soil or groundwater containing low concentrations of TPHmo during connection of the sanitary sewer line to the main in the street. Due to the low toxicity of TPHmo, low concentrations of TPHmo are not considered a significant risk.	n/a	None	n/a
	Off Site	None	n/a	None	n/a

## FIGURES



## SITE LOCATION MAP

1600 Park Street, Alameda, California 94501

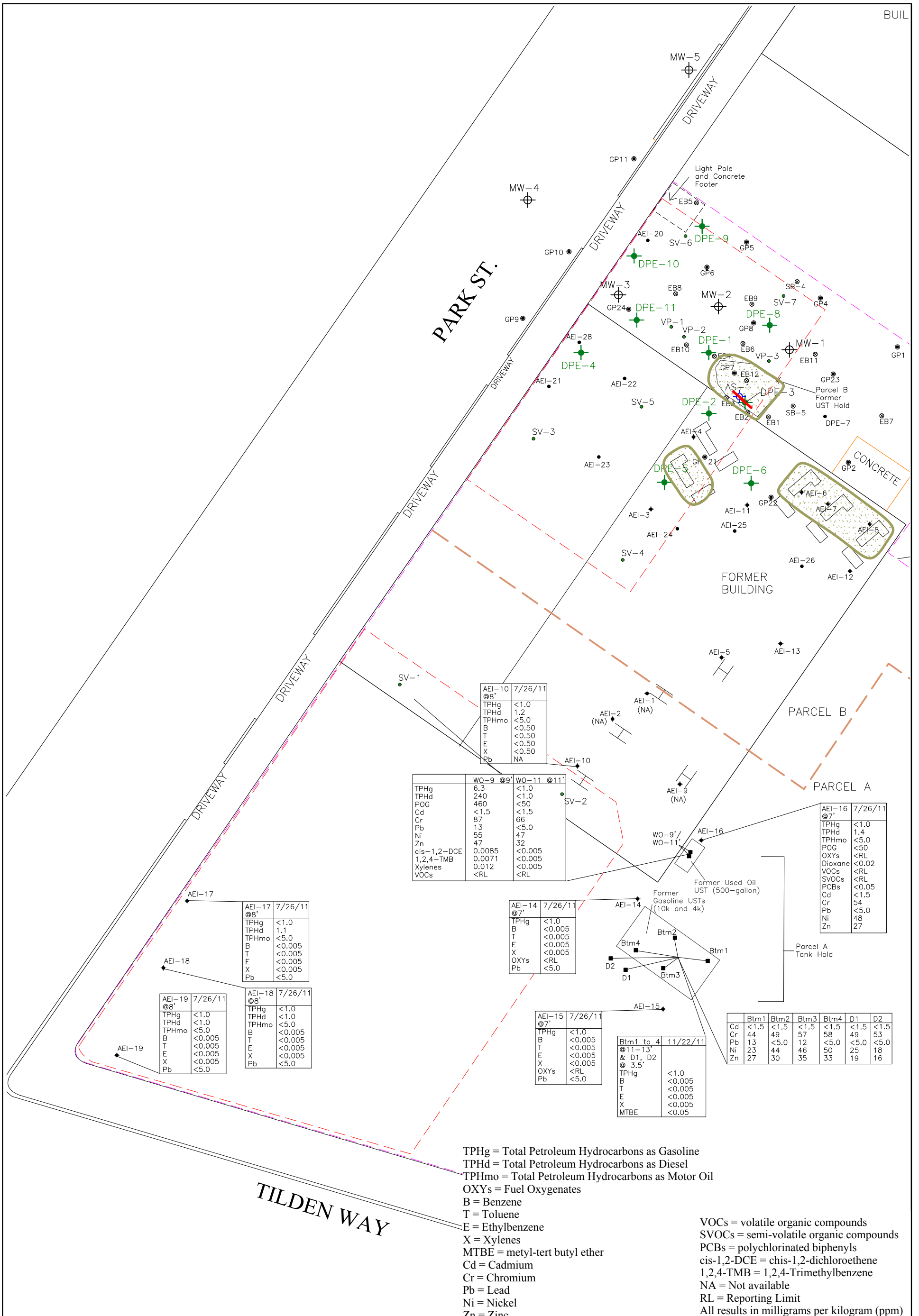


FIGURE 1

Project Number: 298931

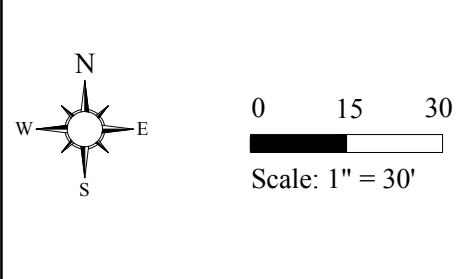
**AEI**  
Consultants





TPHg = Total Petroleum Hydrocarbons as Gasoline  
 TPHd = Total Petroleum Hydrocarbons as Diesel  
 TPHmo = Total Petroleum Hydrocarbons as Motor Oil  
 OXYs = Fuel Oxygenates  
 B = Benzene  
 T = Toluene  
 E = Ethylbenzene  
 X = Xylenes  
 MTBE = methyl-tert butyl ether  
 Cd = Cadmium  
 Cr = Chromium  
 Pb = Lead  
 Ni = Nickel  
 Zn = Zinc

VOCs = volatile organic compounds  
 SVOCs = semi-volatile organic compounds  
 PCBs = polychlorinated biphenyls  
 cis-1,2-DCE = chis-1,2-dichloroethene  
 1,2,4-TMB = 1,2,4-Trimethylbenzene  
 NA = Not available  
 RL = Reporting Limit  
 All results in milligrams per kilogram (ppm)



**LEGEND**

	Remediation Well (12/11 and 1/12)		Former Building
	Groundwater Monitoring Well		Hydraulic Lift
	AEI Soil Boring (1/12)		Former Hydraulic Lift
	AEI Soil Boring (7/11)		Soil Boring (4/08)
	Parcel Split		Soil Boring (Pre 1997)
	Property Line		Vapor Probe
			Abandoned Well
			Proposed Buildings

DRAFTED BY JAS 3-9-12  
 REVISED BY JAS 3-24-13

**AEI CONSULTANTS**  
 2500 CAMINO DIABLO, WALNUT CREEK

**SOIL ANALYTICAL  
 MAP - PARCEL A**

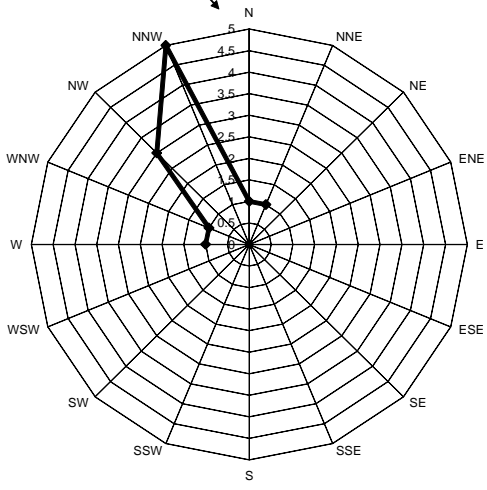
1600 PARK STREET  
 ALAMEDA, CALIFORNIA

**FIGURE 3**  
 PROJECT NO. 298931

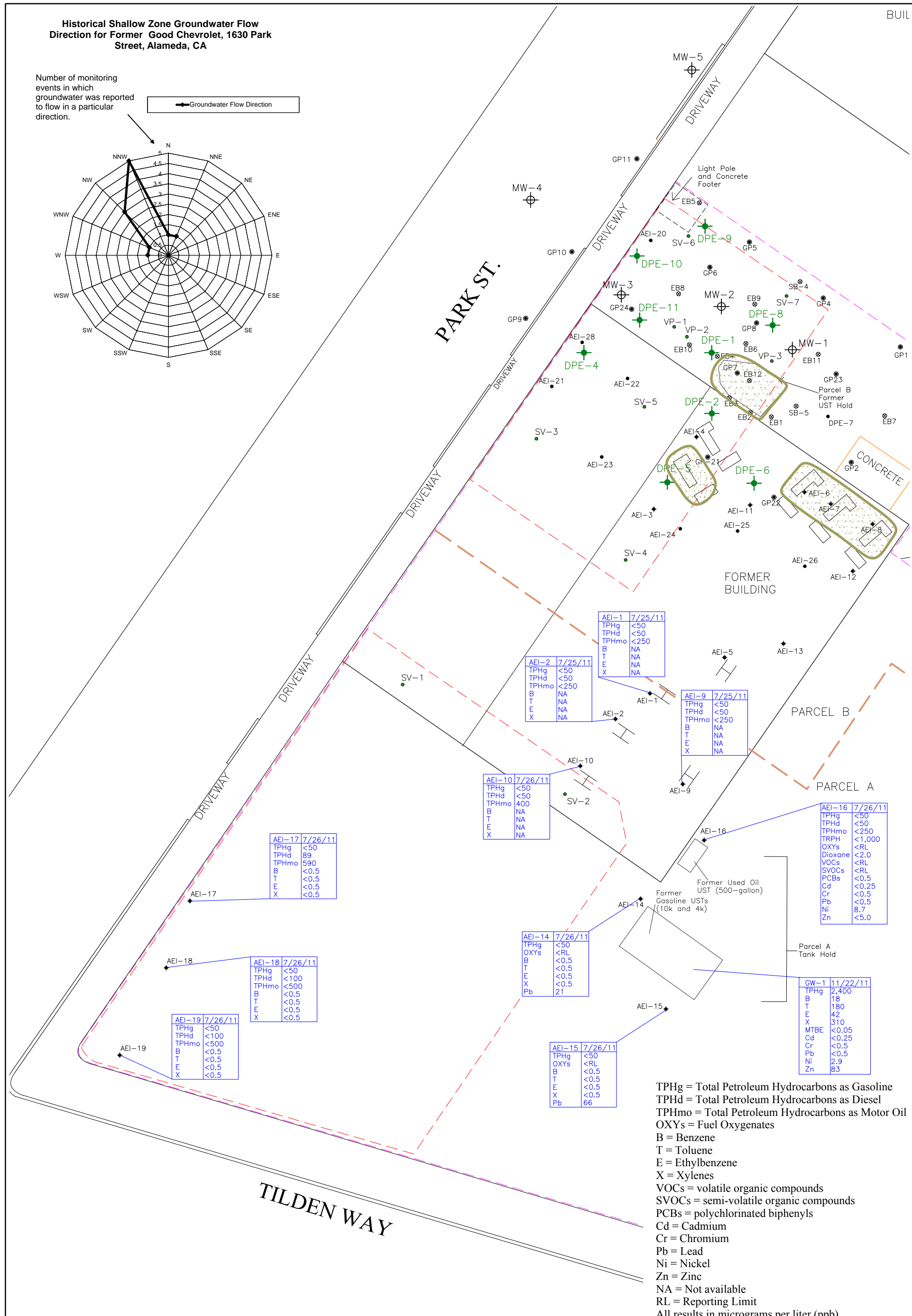


**Historical Shallow Zone Groundwater Flow Direction for Former Good Chevrolet, 1630 Park Street, Alameda, CA**

Number of monitoring events in which groundwater was reported to flow in a particular direction.



Groundwater Flow Direction



AEI-17	7/26/11
TPHg	<50
TPHd	89
TPHmo	590
B	<0.5
T	<0.5
E	<0.5
X	<0.5

AEI-2	7/25/11
TPHg	<50
TPHd	<50
TPHmo	<250
B	NA
T	NA
E	NA
X	NA

AEI-1	7/25/11
TPHg	<50
TPHd	<50
TPHmo	<250
B	NA
T	NA
E	NA
X	NA

AEI-9	7/25/11
TPHg	<50
TPHd	<50
TPHmo	<250
B	NA
T	NA
E	NA
X	NA

AEI-10	7/26/11
TPHg	<50
TPHd	<50
TPHmo	400
B	NA
T	NA
E	NA
X	NA

AEI-16	7/26/11
TPHg	<50
TPHd	<50
TPHmo	<250
TRPH	<1,000
OXYs	<RL
Dioxane	<2.0
VOCs	<RL
SVOCs	<RL
PCBs	<0.5
Cd	<0.25
Cr	<0.5
Pb	<0.5
Ni	8.7
Zn	<5.0

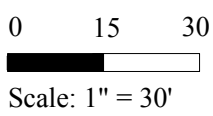
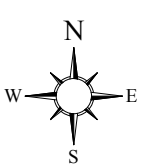
AEI-14	7/26/11
TPHg	<50
OXYs	<RL
B	<0.5
T	<0.5
E	<0.5
X	<0.5
Pb	21

AEI-19	7/26/11
TPHg	<50
TPHd	<100
TPHmo	<500
B	<0.5
T	<0.5
E	<0.5
X	<0.5

AEI-15	7/26/11
TPHg	<50
OXYs	<RL
B	<0.5
T	<0.5
E	<0.5
X	<0.5
Pb	66

CW-1	11/22/11
TPHg	2,400
B	18
T	180
E	42
X	310
MTBE	<0.05
Cd	<0.25
Cr	<0.5
Pb	<0.5
Ni	2.9
Zn	83

TPHg = Total Petroleum Hydrocarbons as Gasoline  
 TPHd = Total Petroleum Hydrocarbons as Diesel  
 TPHmo = Total Petroleum Hydrocarbons as Motor Oil  
 OXYs = Fuel Oxygenates  
 B = Benzene  
 T = Toluene  
 E = Ethylbenzene  
 X = Xylenes  
 VOCs = volatile organic compounds  
 SVOCs = semi-volatile organic compounds  
 PCBs = polychlorinated biphenyls  
 Cd = Cadmium  
 Cr = Chromium  
 Pb = Lead  
 Ni = Nickel  
 Zn = Zinc  
 NA = Not available  
 RL = Reporting Limit  
 All results in micrograms per liter (ppb)



**LEGEND**

- Remediation Well (12/11 and 1/12)
- Groundwater Monitoring Well
- AEI Soil Boring (1/12)
- AEI Soil Boring (7/11)
- Parcel Split
- Property Line
- Former Hydraulic Lift
- Former Hydraulic Lift
- Soil Boring (4/08)
- Soil Boring (1/97)
- Vapor Probe
- Air Sparge Well
- Proposed Buildings

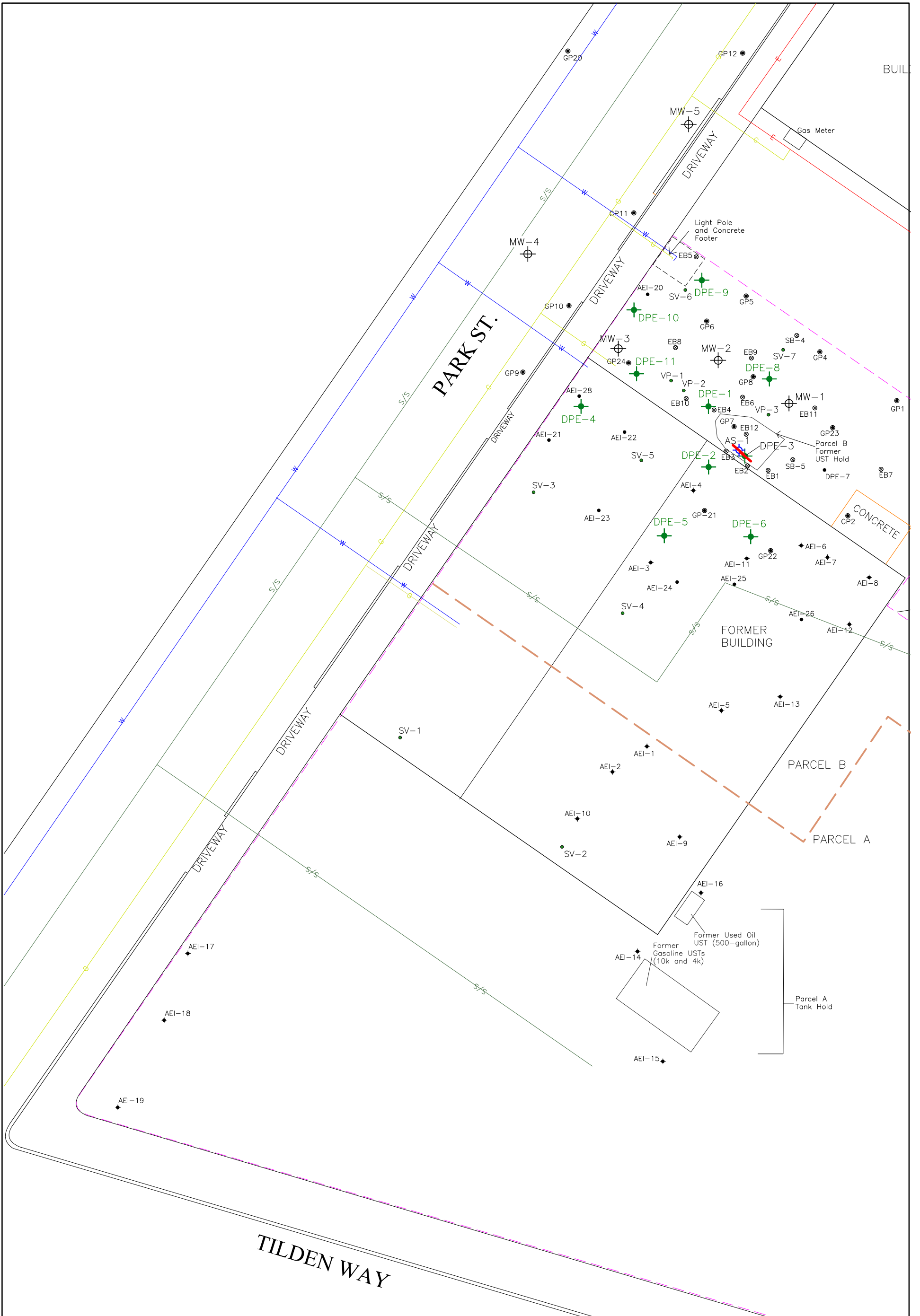
DRAFTED BY JAS 3-9-12  
 REVISED BY JAS 3-24-13

**AEI CONSULTANTS**  
 2500 CAMINO DIABLO, WALNUT CREEK

**GROUNDWATER ANALYTICAL MAP-PARCEL A**

1600 PARK STREET  
 ALAMEDA, CALIFORNIA

**FIGURE 4**  
 PROJECT NO. 298931



Scale: 1" = 30'

LEGEND	
	Groundwater Monitoring Well
	AEI Soil Boring (7/11)
	Parcel Split
	Property Line
	Underground Natural Gas Line (3 to 4 feet bgs)
	Underground Water Line (3 feet bgs)
	Underground Electric Line (3 feet bgs)
	Underground Sanitary Sewer Line (10.3 to 11.3 feet bgs)

DRAFTED BY JAS 3-2-12  
 REVISED BY JAS 3-24-13

**AEI CONSULTANTS**  
 2500 CAMINO DIABLO, WALNUT CREEK

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**UTILITY MAP -**  
**PARCEL A**

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1600 PARK STREET ALAMEDA, CALIFORNIA	<b>FIGURE 5</b> PROJECT NO. 298931
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## **TABLES**

**Table 1**  
**Soil Sample Analytical Data**  
**TPH, MBTEX and POG**

AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California

Sample ID	Date Collected	Approx. Depth (feet)	TPH-g (mg/kg)	TPH-d* (mg/kg)	TPH-mo* (mg/kg)	MTBE (mg/kg) EPA Method SW8021B/8015B/m	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	POG (mg/kg) EPA Method SM5520E/F
AEI-10-8'	7/26/2011	8	<1.0	1.2	<5.0	<5.0	<0.50	<0.50	<0.50	<0.50	-
AEI-14-7'	7/26/2011	7	<1.0	-	-	<0.05	<0.005	<0.005	<0.005	<0.005	-
AEI-15-7'	7/26/2011	7	<1.0	-	-	<0.05	<0.005	<0.005	<0.005	<0.005	-
AEI-16-7'	7/26/2011	7	<1.0	1.4	<5.0	-	-	-	-	-	<50
AEI-17-8'	7/26/2011	8	<1.0	1.1	<5.0	<0.05	<0.005	<0.005	<0.005	<0.005	-
AEI-18-8'	7/26/2011	8	<1.0	<1.0	<5.0	<0.05	<0.005	<0.005	<0.005	<0.005	-
AEI-19-8'	7/26/2011	8	<1.0	<1.0	<5.0	<0.05	<0.005	<0.005	<0.005	<0.005	-

mg/kg = milligrams per kilogram (equivalent to parts per million)  
MDL = method detection limit      POG = petroleum oil and grease  
TPH = total petroleum hydrocarbons      MTBE = methyl butyl tertiary ethyl  
TPH-g = TPH as gasoline      "<" = less than  
TPH-d = TPH as diesel      "\*" = with silica gel cleanup  
TPH-mo = TPH as motor oil      "-" = not available

**Table 2**  
**Soil Sample Analytical Data**  
**VOCs, Fuel Oxygenates, SVOCs, and PCBs**  
 AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California

Sample ID	Date Collected	Approx. Depth (feet)	1,4-Dioxane (mg/kg) EPA Method SW8260	All target VOCs (mg/kg) EPA Method SW8260	Fuel Oxygenates^ (mg/kg) EPA Method SW8260B	All target SVOCs (mg/kg) EPA Method 8270	All other target PCBs (mg/kg) EPA Method SW8082
AEI-14-7'	7/26/2011	7	-	-	<MDL	-	-
AEI-15-7'	7/26/2011	7	-	-	<MDL	-	-
AEI-16-7'	7/26/2011	7	<0.02	<MDL	<MDL	<MDL	<0.05

mg/kg = milligrams per kilogram (equivalent to parts per million)

MDL = method detection limit

VOCs = volatile organic compounds

SVOCs = semi-volatile organic compounds

PCBs = polychlorinated biphenyls

"<" = less than

"-" = not available

"^" = fuel oxygenates tert-amyl methyl ether (TAME), t-butyl alcohol (TBA),

1,2-dibromomethane (EDB), 1,2-dichloroethane (1,2-DCA), diisopropyl ether (DIPE), methanol, ethanol, ethyl tert-butyl ether (ETBE), methyl tert-butyl ether (MTBE), and 1,2-Dichloroethane (EDC)

**Table 3**  
**Soil Sample Analytical Data**  
**Metals**

AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California

Sample ID	Date Collected	Approx. Depth (feet)	Cd mg/kg	Cr (total)* mg/kg	Pb mg/kg EPA Method SW6010B	Ni mg/kg	Zn mg/kg
AEI-14-7'	7/26/2011	7	-	-	<5.0	-	-
AEI-15-7'	7/26/2011	7	-	-	<5.0	-	-
AEI-16-7'	7/26/2011	7	<1.5	54	<5.0	48	27
AEI-17-8'	7/26/2011	8	-	-	<5.0	-	-
AEI-18-8'	7/26/2011	8	-	-	<5.0	-	-
AEI-19-8'	7/26/2011	8	-	-	<5.0	-	-

**Notes:**

mg/kg = milligrams per kilogram

"-" = not available

Cd = Cadmium

Cr = Chromium

Pb = Lead

Ni = Nickel

Zn = Zinc

**Table 4**

**Groundwater Analytical Data - Grab Samples  
TPH, MBTEX and TRPH**

AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California

Sample ID	Date Collected	TPH-g (µg/L)	TPH-d* (µg/L)	TPH-mo* (µg/L)	MTBE (µg/L) EPA Method SW8021B/8015Bm	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	TRPH (µg/L) EPA Method E418.1
AEI-1-W	7/25/2011	<50	<50	<250	-	-	-	-	-	-
AEI-2-W	7/25/2011	<50	<50	<250	-	-	-	-	-	-
AEI-9-W	7/25/2011	<50	<50	<250	-	-	-	-	-	-
AEI-10-W	7/26/2011	<50	<50	400	-	-	-	-	-	-
AEI-14-W	7/26/2011	<50	-	-	<5.0	<0.5	<0.5	<0.5	<0.5	-
AEI-15-W	7/26/2011	<50	-	-	<5.0	<0.5	<0.5	<0.5	<0.5	-
AEI-16-W	7/26/2011	<50	<50	<250	<0.5	<0.5	<0.5	<0.5	<0.5	<1.0
AEI-17-W	7/26/2011	<50	89	590	<5.0	<0.5	<0.5	<0.5	<0.5	-
AEI-18-W	7/26/2011	<50	<100	<500	<5.0	<0.5	<0.5	<0.5	<0.5	-
AEI-19-W	7/26/2011	<50	<100	<500	<5.0	<0.5	<0.5	<0.5	<0.5	-

µg/L = micrograms per liter  
 TPH = total petroleum hydrocarbons  
 TPH-g = TPH as gasoline  
 TPH-d = TPH as diesel  
 TPH-mo = TPH as motor oil  
 MTBE = methyl tertiary butyl ether  
 "\*" = with silica gel cleanup  
 "-" = not available

"<" = less than  
 MDL = method detection limit  
 TRPH = total recoverable petroleum hydrocarbons  
 MTBE and BTEX analysis for AEI-16-W performed by EPA Method SW8260B

**Table 5**  
**Groundwater Analytical Data - Grab Samples**  
**VOCs, Fuel Oxygenates, SVOCs, and PCBs**  
 AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California

Sample ID	Date Collected	1,4-Dioxane (µg/L)	TBA (µg/L)	EDB (µg/L)	EDC (µg/L) EPA Method SW8260B	MTBE (µg/L)	Fuel Oxygenates (µg/L)	All Target VOCs (µg/L)	All Target SVOCs (µg/L) EPA Method 8270	All Target PCBs (µg/L) EPA Method SW8082
AEI-14-W	7/26/2011	-	<2.0	<0.5	<0.5	<0.5	<MDL	-	-	-
AEI-15-W	7/26/2011	-	<2.0	<0.5	<0.5	<0.5	<MDL	-	-	-
AEI-16-W	7/26/2011	<2.0	<2.0	<0.5	<0.5	<0.5	<MDL	<MDL	<MDL	<0.5

mg/kg = milligrams per kilogram (equivalent to parts per million)

MDL = method detection limit

VOCs = volatile organic compounds

SVOCs = semi-volatile organic compounds

PCBs = polychlorinated biphenyls

TBA = t-butyl alcohol

EDB = 1,2-dibromomethane

EDC = 1,2-dichloroethane

MTBE = methyl tert-butyl ether

"-" = not available

"<" = less than

"^" = fuel oxygenates tert-amyl methyl ether (TAME),  
 1,2-dichloroethane (1,2-DCA), diisopropyl ether (DIPE), methanol,  
 ethanol, and ethyl tert-butyl ether (ETBE)



**Table 6**  
**Grab Groundwater Sample Analytical Data**  
**Metals**

AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, California

Sample ID	Date Collected	Cd µg/L	Cr (total) µg/L	Pb µg/L EPA Method E200.8	Ni µg/L	Zn µg/L
AEI-14-W*	7/26/2011	-	-	21	-	-
AEI-15-W*	7/26/2011	-	-	66	-	-
AEI-16-W**	7/26/2011	<0.25	<0.5	<0.5	8.7	<5.0

**Notes:**

µg/L = micrograms per liter

"\*" = total

"\*\*" = dissolved

Cd = Cadmium

Cr = Chromium

Pb = Lead

Ni = Nickel

Zn = Zinc

**Table 7**  
**Soil Vapor Analytical Data**  
 AEI Project No. 298931, 1600 Park Street (Parcel A), Alameda, CA

Sample ID	Date	Sample Depth (feet bgs)	TPH-g ( $\mu\text{g}/\text{m}^3$ )	Benzene ( $\mu\text{g}/\text{m}^3$ )	Toluene ( $\mu\text{g}/\text{m}^3$ )	Ethylbenzene ( $\mu\text{g}/\text{m}^3$ )	Xylenes ( $\mu\text{g}/\text{m}^3$ )	Naphthalene ( $\mu\text{g}/\text{m}^3$ )	CO2 ( $\mu\text{g}/\text{L}$ )	Methane ( $\mu\text{g}/\text{L}$ )	Oxygen ( $\mu\text{g}/\text{L}$ )	Helium maintained in Shroud <sup>1</sup> %	Laboratory Reported Helium %	Corrected Helium <sup>2</sup> %
SV-1	4/16/2013	5.0	<2,500	<25	<25	<25	<25	<25	3,400	<2.0	170,000	18.5	0.017	0.092
SV-2	4/16/2013	5.0	<2,500	<25	<25	<25	<25	<25	4,600	2	170,000	21.9	0.018	0.082
Trip Blank	4/16/2013	NA	<2,500	<25	<25	<25	<25	<25	NA	NA	NA	NA	<0.005	<0.005
ESL	--		3,100,000	420	1,300,000	4,900	440,000	360	NA	NA	NA	NA	NA	NA

TPH-g= total petroleum hydrocarbons as gasoline

bgs = below ground surface

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter

$\mu\text{g}/\text{L}$  = micrograms per liter

Helium used as leak check compound.

NA = Not analyzed or applicable

ESL = Environmental Screening Levels, Table E-2, San Francisco Regional Water Quality Control Board (Shallow Soil Gas- Lowest Commercial), Revised February 2013

TPH-g & VOCs analyzed using EPA Method TO17

Atmospheric gases analyzed using Method ASTM D1946-90

<sup>1</sup> = Lowest measured helium percentage recorded during sampling (most conservative number)

<sup>2</sup> = Helium corrected to represent % of leak at 100% concentration in shroud. DTSC recognizes <5% as acceptable.

**Table 8 : UST Removal Sample Analytical Data Tables**  
**1600 Park Street, Alameda, CA**

**Soil Sample Analytical Data - Petroleum Hydrocarbons and Metals**

Sample ID	Date	Depth	TPH-g	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	TPH-d	POG	Cadmium	Chromium	Lead	Nickel	Zinc
			(mg/kg)												
			Method SW8021B/8015Bm									SW8015B	SM5520	SW6010B	
Btm1	11/22/2011	13'	ND<1.0	ND<0.05	ND<0.005	ND<0.005	ND<0.005	ND<0.005	-	-	ND<1.5	44.0	13.0	23	27
Btm2	11/22/2011	13'	ND<1.0	ND<0.05	ND<0.005	ND<0.005	ND<0.005	ND<0.005	-	-	ND<1.5	49	ND<5.0	44	30
Btm3	11/22/2011	11'	ND<1.0	ND<0.05	ND<0.005	ND<0.005	ND<0.005	ND<0.005	-	-	ND<1.5	57	12	46	35
Btm4	11/22/2011	11'	ND<1.0	ND<0.05	ND<0.005	ND<0.005	ND<0.005	ND<0.005	-	-	ND<1.5	58	ND<5.0	50	33
D1	11/22/2011	3.5'	ND<1.0	ND<0.05	ND<0.005	ND<0.005	ND<0.005	ND<0.005	-	-	ND<1.5	49	ND<5.0	25	19
D2	11/22/2011	3.5'	ND<1.0	ND<0.05	ND<0.005	ND<0.005	ND<0.005	ND<0.005	-	-	ND<1.5	53	ND<5.0	18	16
WO-9***	11/22/2011	9'	6.3	-	-	-	-	-	240	460	ND<1.5	87	13	55	47
WO-11'	11/22/2011	11'	ND<1.0	-	-	-	-	-	ND<1.0	ND<50	ND<1.5	66	ND<5.0	47	32

**Soil Sample Analytical Data - Volatile Organic Compounds (VOCs)**

Sample ID	Date	PCE	cis12-DCA	124-TMB	Xylenes
		(mg/kg)			
		Method SW8260B			
STKP2(A/B/C/D)	11/22/2011	0.016	ND<0.005	0.0056	0.0051
WO-9***	11/22/2011	ND<0.005	0.0085	0.0071	0.012
WO-11'	11/22/2011	ND<0.005	ND<0.005	ND<0.005	ND<0.005

**Groundwater Sample Analytical Data - Petroleum Hydrocarbons and Metals**

Sample ID	Date	Depth	TPH-g	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	Cadmium	Chromium	Lead	Nickel	Zinc		
			(µg/L)												
			Method SW8021B/8015Bm									E200.8			
GW-1	11/22/2011	13'	2400	ND<0.05	18	180	42	310	ND<0.25	ND<0.5	ND<0.5	2.9	83		

mg/kg = milligrams per kilogram

µg/L = micrograms per liter

TPH-g = total petroleum hydrocarbons as gasoline

TPH-d = total petroleum hydrocarbons as diesel

ND = non-detect, below reporting limit

124-TMB = 1,2,4-Trimethylbenzene

PCE = Tetrachloroethene

cis12-DCA = cis-1,2-Dichloroethene

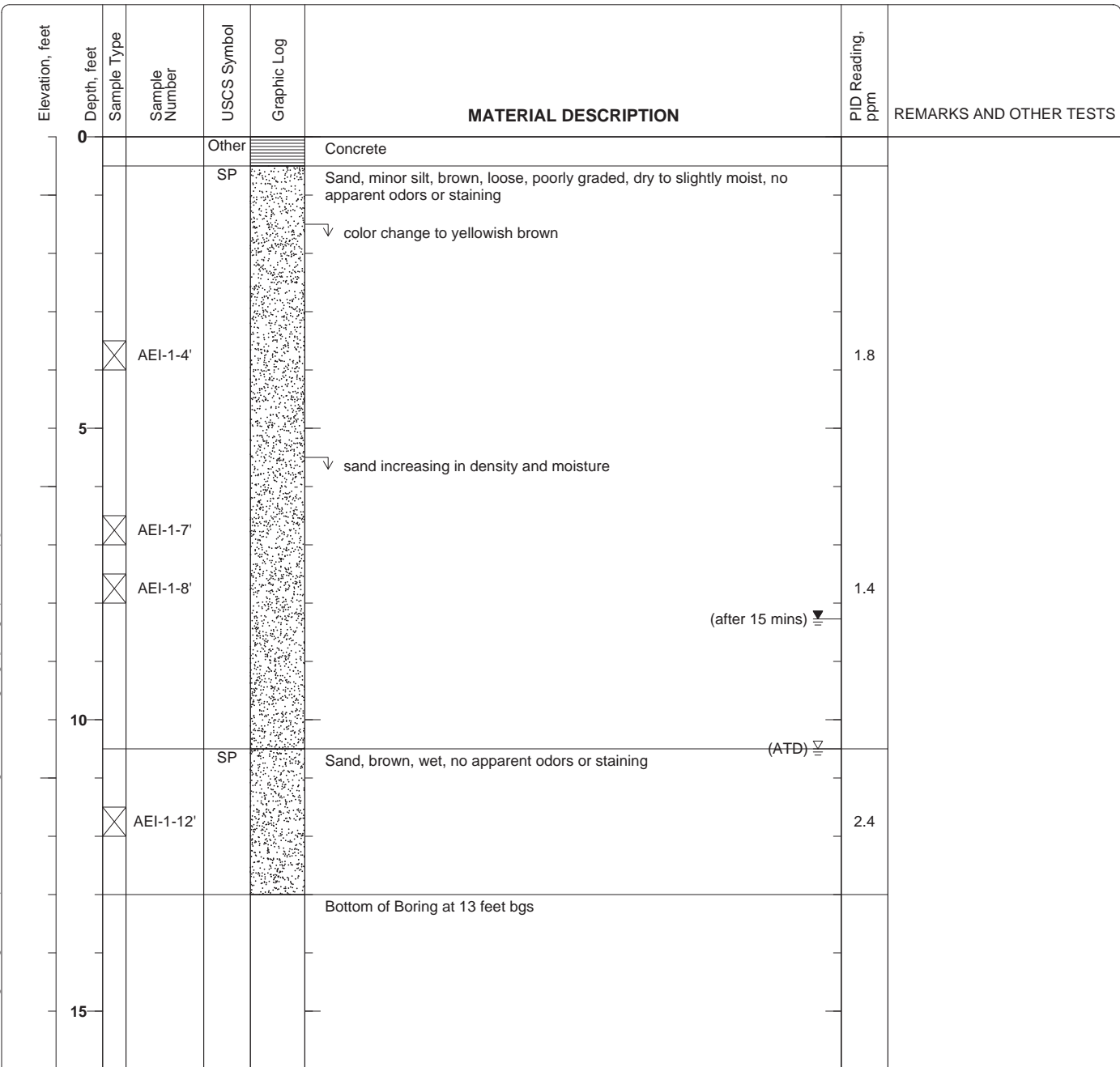
\*\*\* = denotes sample area which was removed in additional excavation activities performed on 12/2/2011

**APPENDIX A**  
**Soil Boring Logs**

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-1**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>13 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>10.5 feet ATD, 8.27 feet after 15 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Hydraulic Lift</b>	



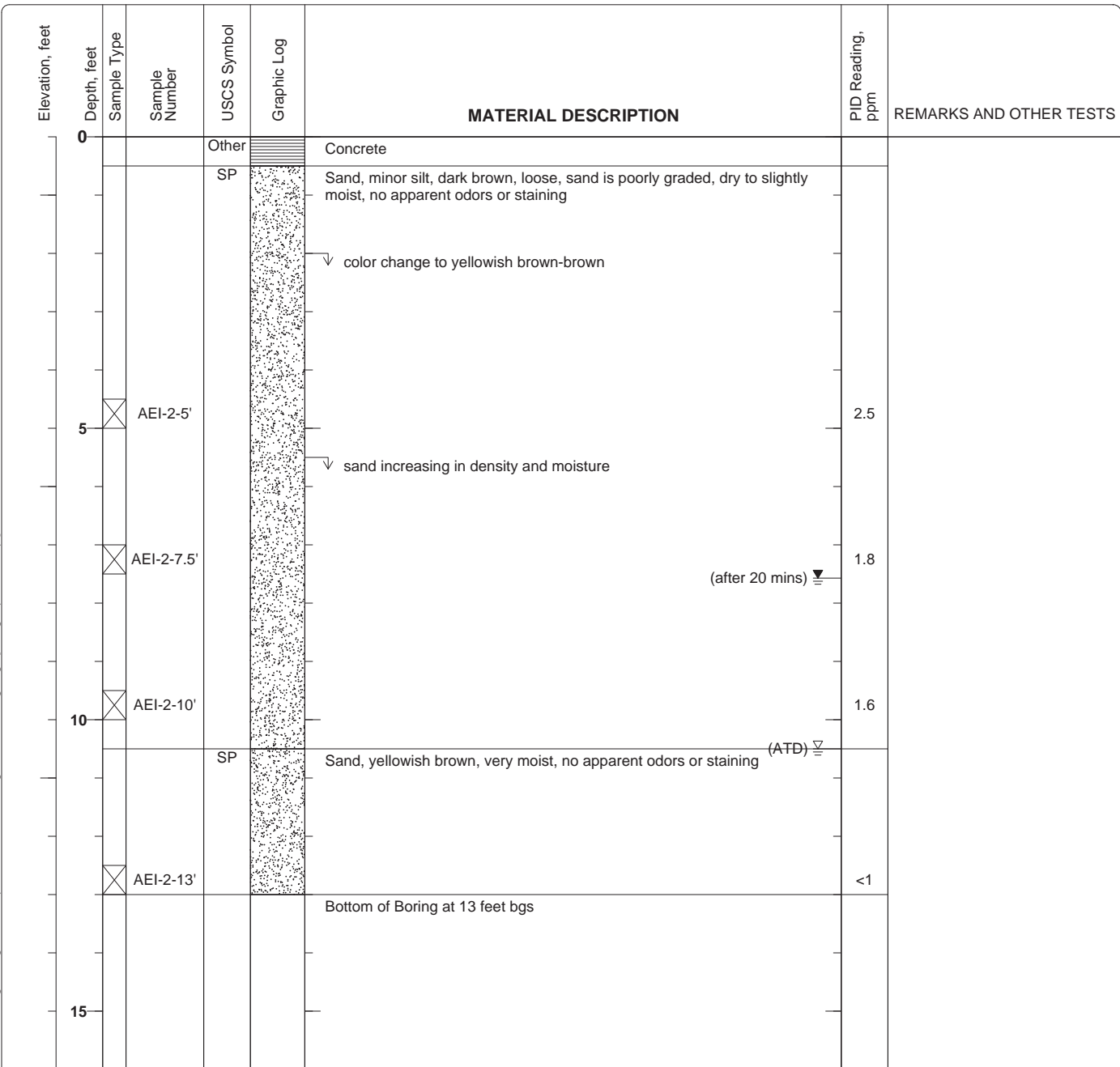
C:\Documents and Settings\angel\ Desktop\beustad\beustad\Logs\Bgs [AEI geoprobe 15.tpl]

Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-2**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>13 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>10.5 feet ATD, 7.57 feet after 20 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Hydraulic Lift</b>	

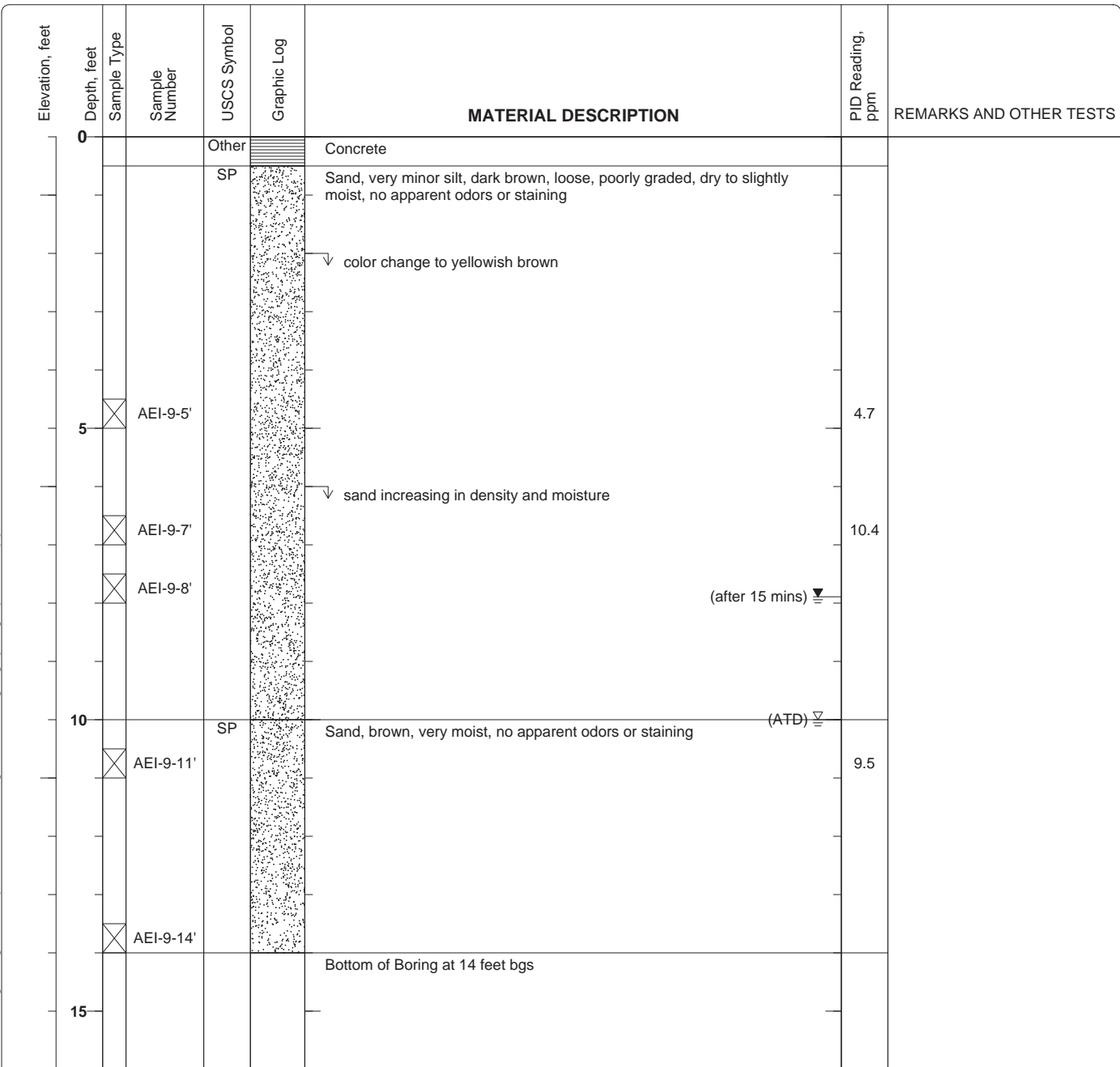


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-9**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>14 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>10 feet ATD, 7.89 feet after 15 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Hydraulic Lift</b>	

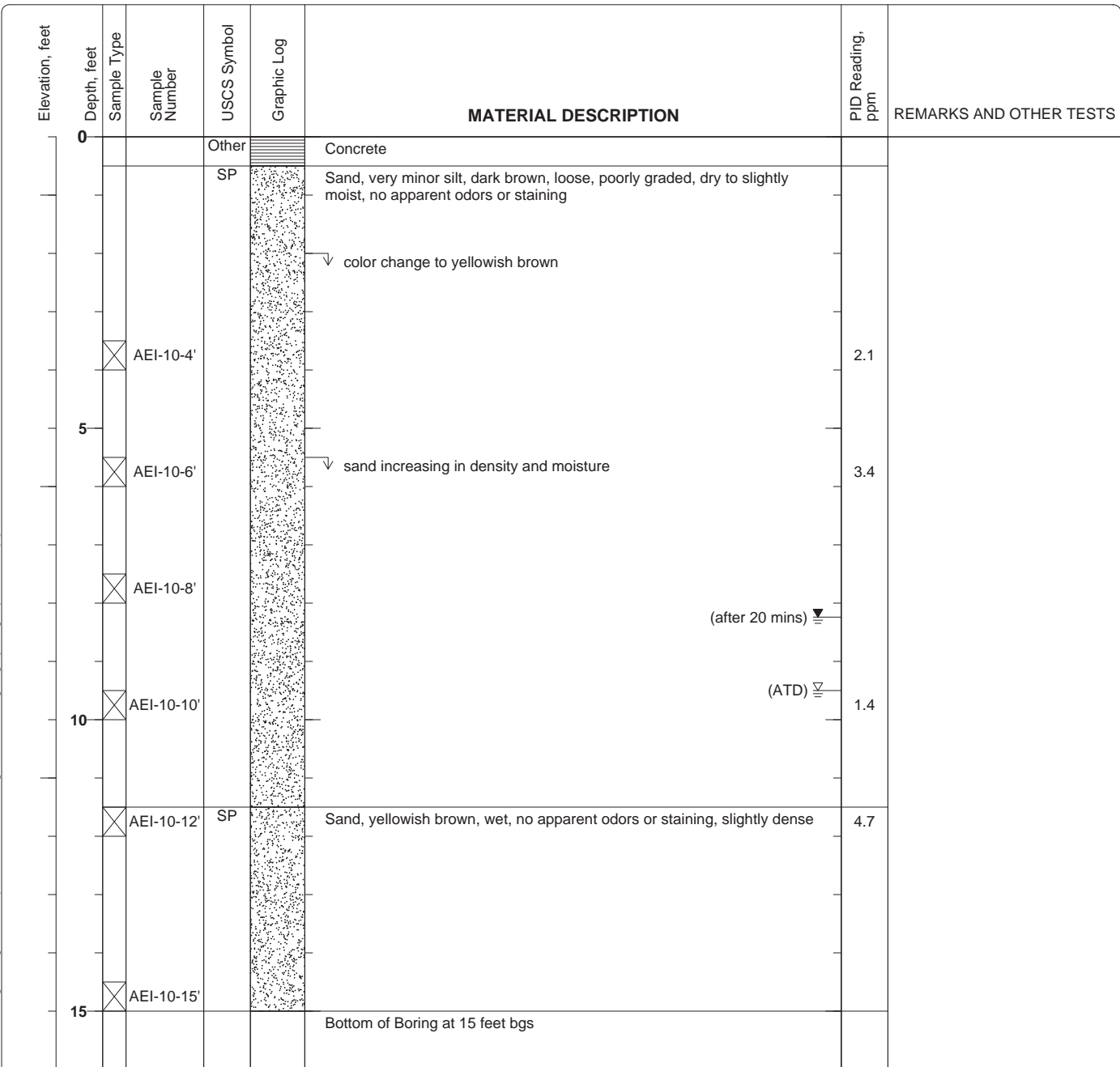


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-10**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>9.5 feet ATD, 8.24 feet after 20 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Hydraulic Lift</b>	



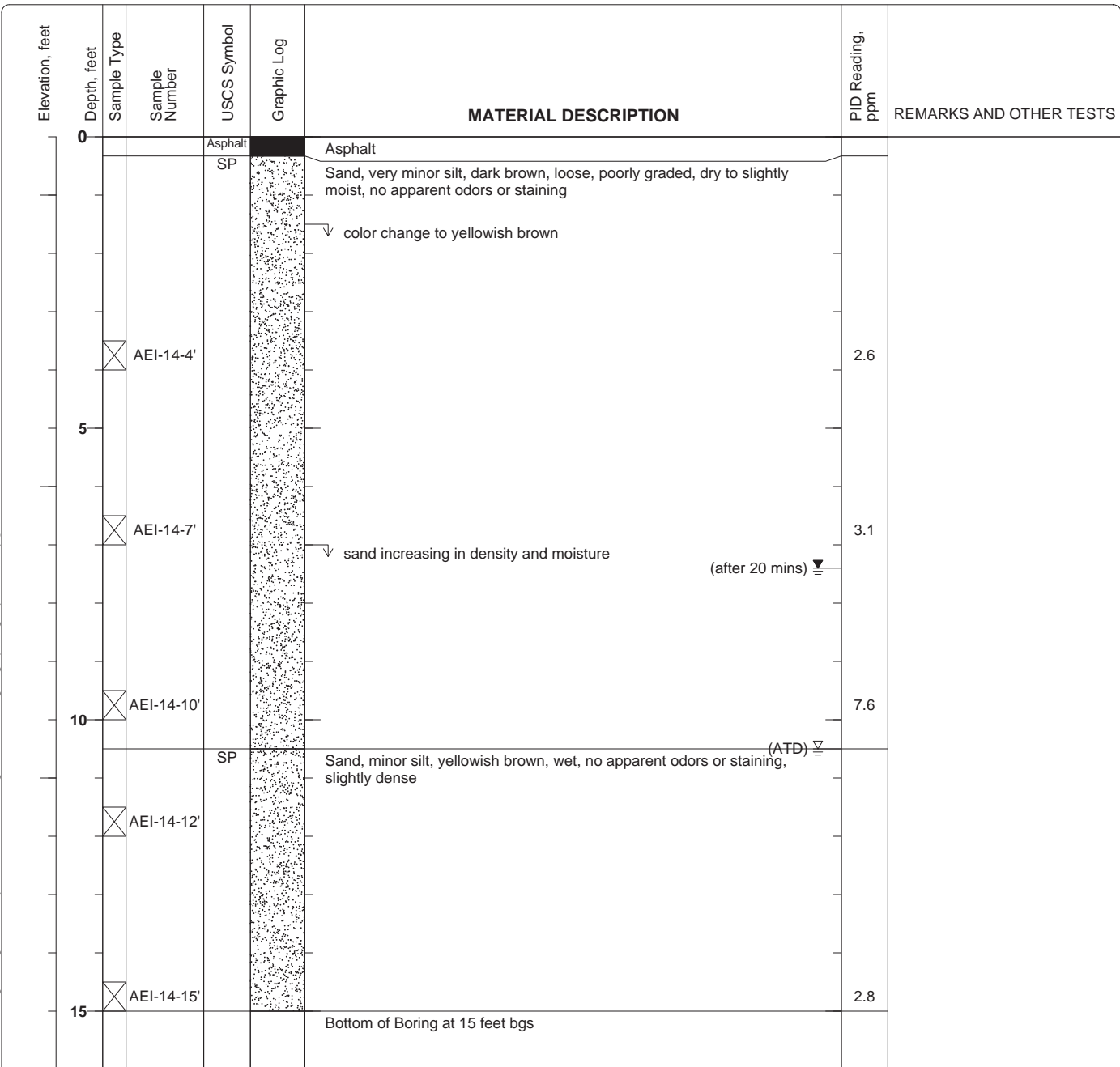
Figure



**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-14**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>10.5 feet ATD, 7.4 feet after 20 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Gas UST</b>	

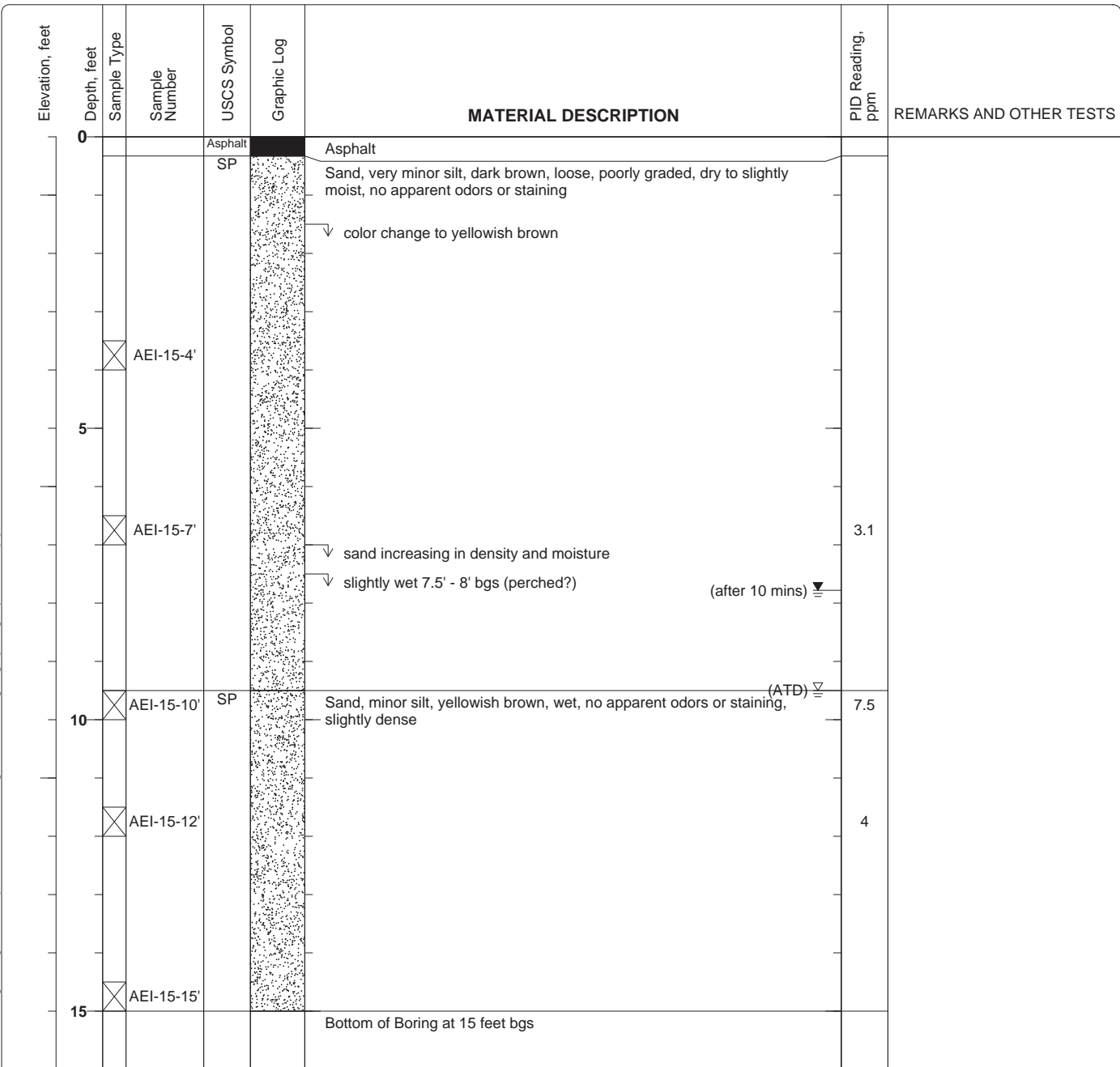


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-15**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>9.5 feet ATD, 7.78 feet after 10 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Gas UST</b>	

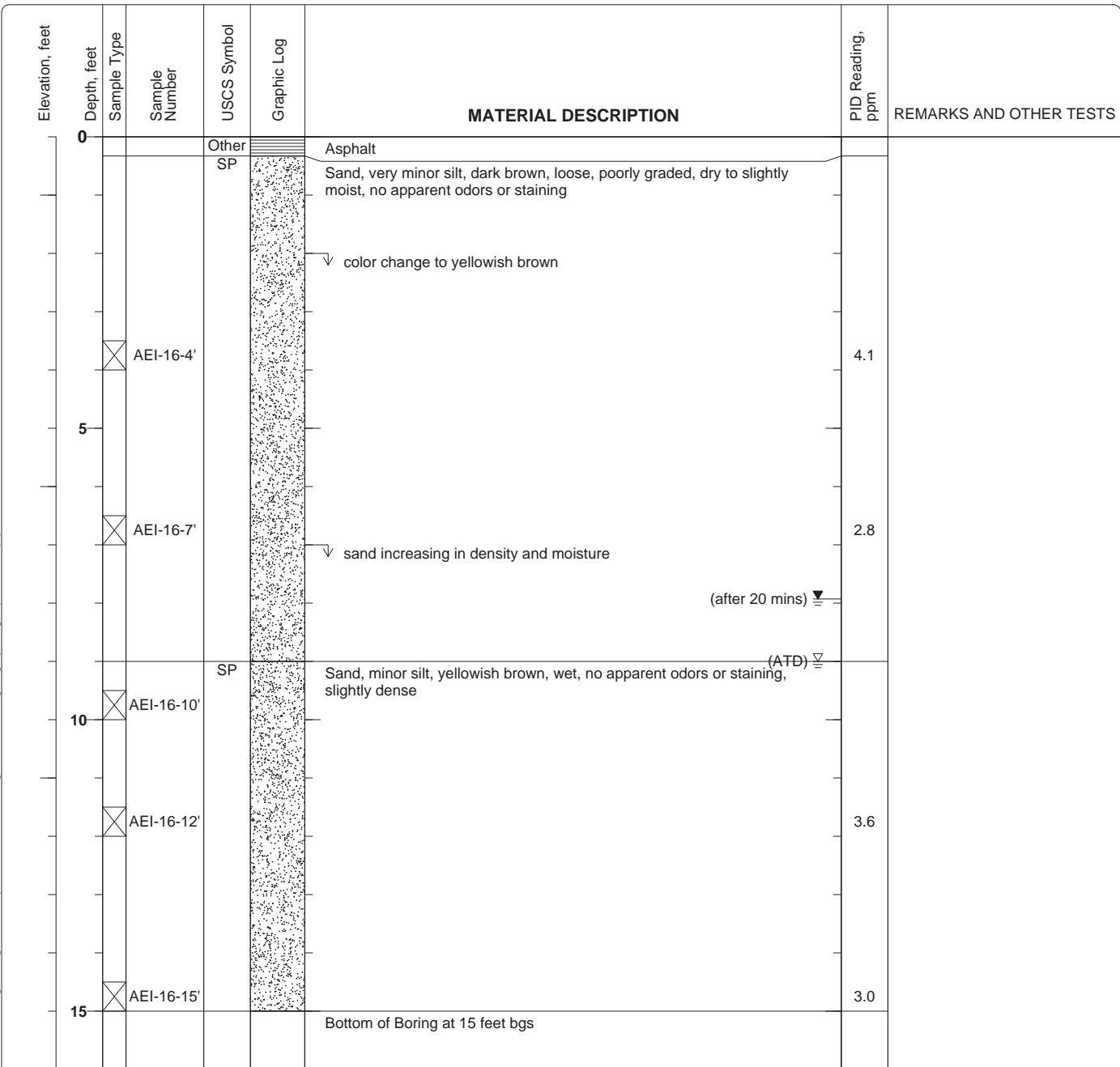


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-16**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>9 feet ATD, 7.93 feet after 20 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Existing Waste Oil UST</b>	

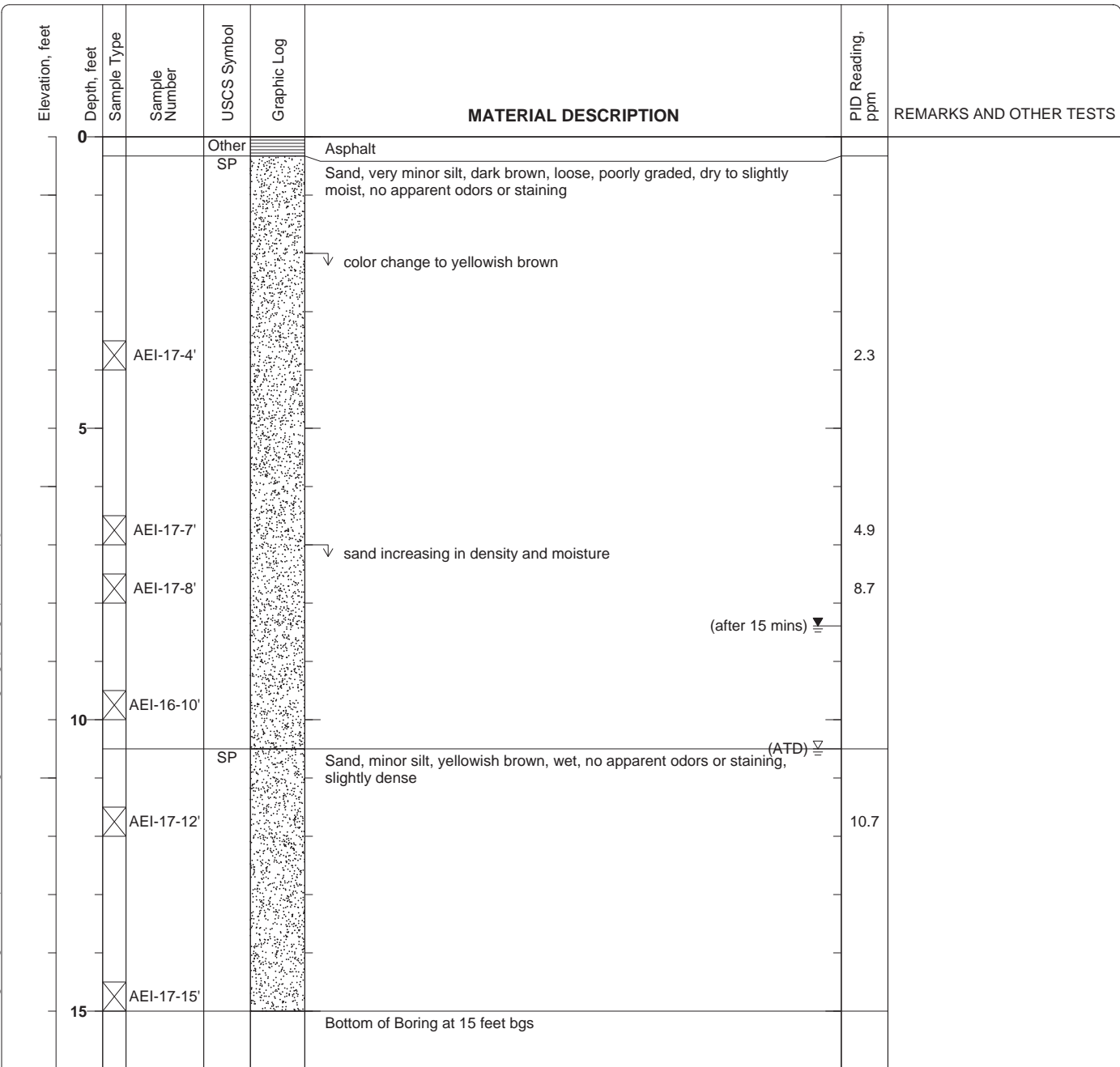


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-17**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>10.5 feet ATD, 8.39 feet after 15 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Former Oil and Gas Area - Southwestern Corner</b>	

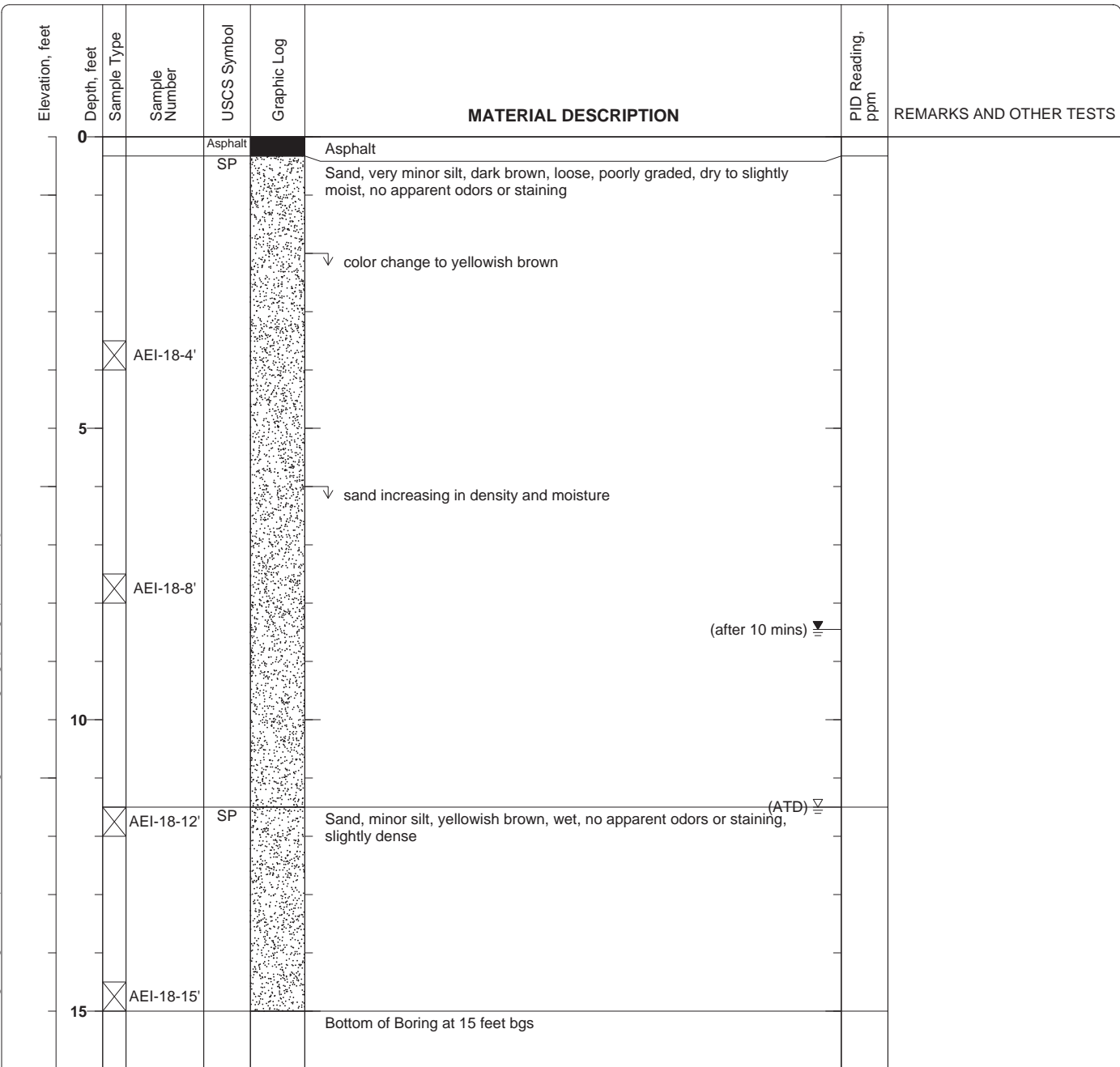


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-18**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>11.5 feet ATD, 8.45 feet after 10 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Former Oil and Gas Area - Southwestern Corner</b>	

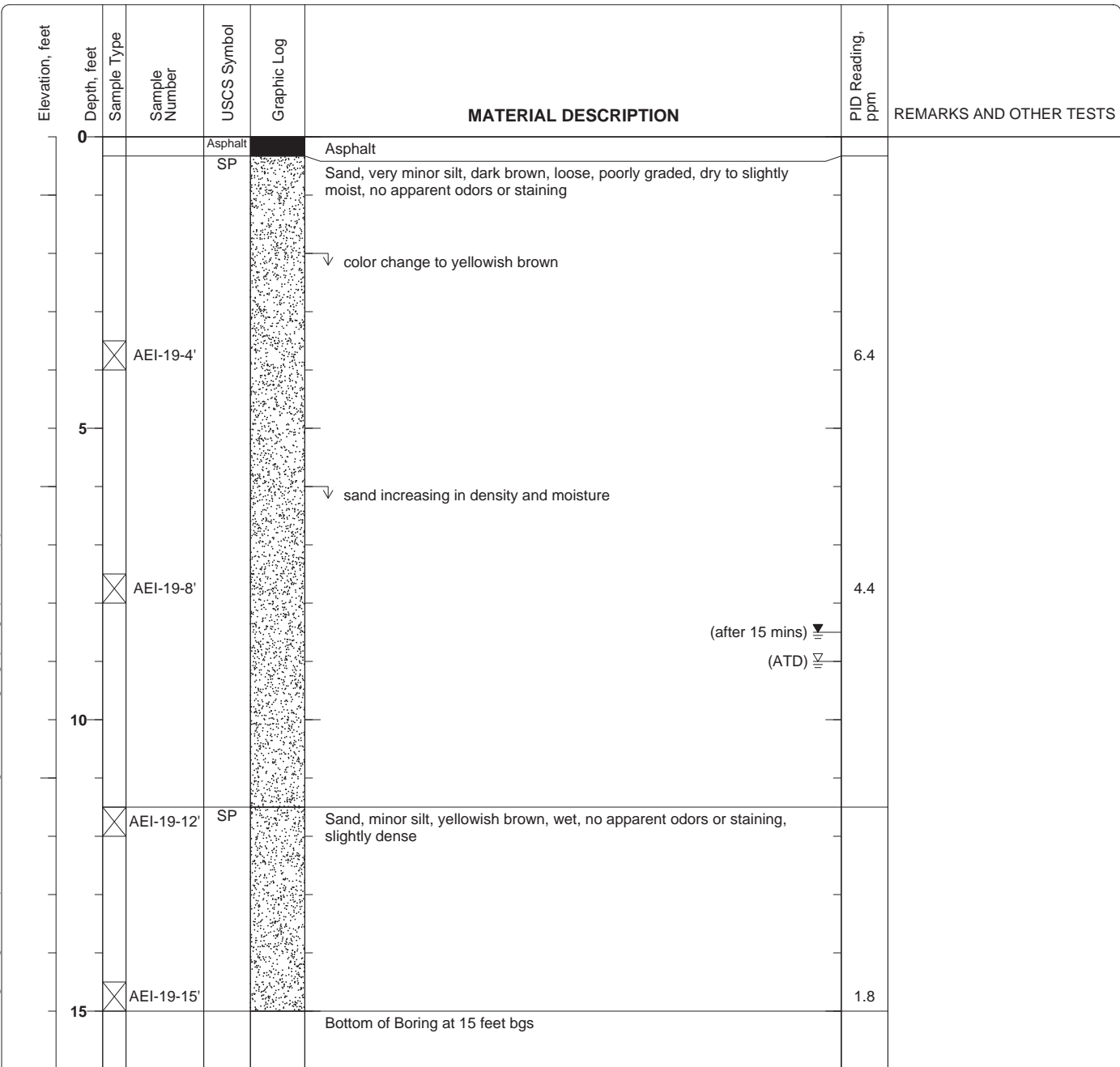


Figure

**Project: Foley Street Investments, LLC**  
**Project Location: 1600 - 1630 Park Street, Alameda, CA**  
**Project Number: 298931**

**Log of Boring AEI-19**  
 Sheet 1 of 1

Date(s) Drilled <b>July 25, 2011</b>	Logged By <b>Adrian Angel</b>	Checked By <b>Peter McIntyre</b>
Drilling Method <b>Direct Push - Geoprobe</b>	Drill Bit Size/Type <b>3 inch</b>	Total Depth of Borehole <b>15 feet bgs</b>
Drill Rig Type <b>Truck-mounted Geoprobe 5410</b>	Drilling Contractor <b>Environmental Control Associates</b>	Approximate Surface Elevation
Groundwater Level and Date Measured <b>9 feet ATD, 8.5 feet after 15 mins</b>	Sampling Method(s) <b>Tube</b>	Well Permit.
Borehole Backfill <b>Neat grout cement</b>	Location <b>Former Oil and Gas Area - Southwestern Corner</b>	



Figure

**APPENDIX B**

**PARCEL SPLIT DOCUMENTATION**

RECORDING REQUESTED BY

PLACER TITLE COMPANY

Escrow Number: 801-15345-AB



2013137559

04/18/2013 08:30 AM

OFFICIAL RECORDS OF ALAMEDA COUNTY

PATRICK O'CONNELL

RECORDING FEE:

44.00

AND WHEN RECORDED MAIL TO  
FOLEY STREET INVESTMENTS LLC,  
A CALIFORNIA LIMITED LIABILITY COMPANY  
1980 MOUNTIAN BLVD #208  
OAKLAND, CA 94611-2834



4 PGS

COPY

A.P.N.: 070-0191-032, 033, 034 AND 035-1

SPACE ABOVE THIS LINE FOR RECORDER'S USE

GRANT DEED

The undersigned grantor(s) declare(s):

R&T CODE 11925

Documentary transfer tax is \$0.00 City Transfer Tax: \$0.00

( ) Unincorporated Area ( X ) City of ALAMEDA

( ) computed on full value of property conveyed, or

( ) computed on full value less value of liens and encumbrances remaining at time of sale.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

FOLEY STREET INVESTMENTS LLC, A CALIFORNIA LIMITED LIABILITY COMPANY

Hereby GRANT(S) to

FOLEY STREET INVESTMENTS LLC, A CALIFORNIA LIMITED LIABILITY COMPANY

THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA,  
CITY OF ALAMEDA, AND IS DESCRIBED AS FOLLOWS:

SEE EXHIBIT "A & B" ATTACHED HERETO AND MADE A PART HEREOF FOR FULL LEGAL DESCRIPTION

Dated: April 15, 2013

FOLEY STREET INVESTMENTS LLC, A CALIFORNIA  
LIMITED LIABILITY COMPANY

By:   
JAMES M. KEATING, MANAGER

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS  
DIRECTED ABOVE

SAME AS ABOVE

Name

Street Address

City & State



STATE OF CALIFORNIA  
COUNTY OF Alameda

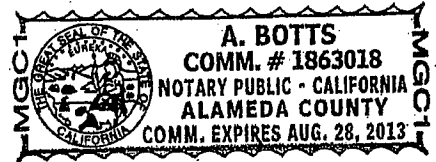
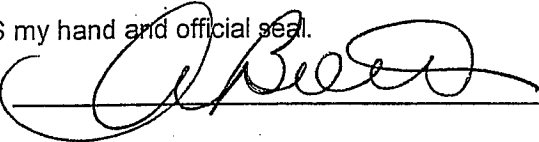
On 4/16/13 before me, A. Botts, Notary Public, personally  
appeared James M. Keating

\_\_\_\_\_, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE

SAME AS ABOVE

Name

Street Address

City & State

**EXHIBIT A**  
**Legal Description**

**PARCEL A**

Real property situated in the City of Alameda, County of Alameda, State of California, and being a portion of the lands described to Foley Street Investments LLC in the deeds recorded September 22, 2011, as Document No. 2011269364, 2011269366 and 2011269367; and May 13, 2011, as Document 2011144640, Official Records of Alameda County, more particularly described as follows:

Beginning at the point of intersection of the southeasterly line of Park Street (80 feet wide) and the northerly line of Tilden Way (70 feet wide), as said streets are shown on the map entitled Alameda Station Homestead Tract, filed March 14, 1868 Map Book 17, Page 60, Alameda County Records; thence continuing along said southeasterly line of Park Street North  $32^{\circ}32'54''$  East, 230.84 feet; thence leaving last line South  $57^{\circ}40'08''$  East, 145.11 feet; thence North  $32^{\circ}19'52''$  East, 50.25 feet; thence South  $57^{\circ}40'08''$  East, 28.89 feet; thence North  $32^{\circ}19'52''$  East, 30.16 feet to a point on the northeasterly exterior of said Foley Street Investment LLC property; thence along said northeasterly exterior line, South  $58^{\circ}58'39''$  East, 96.03 feet to a point on the northwesterly line of Foley Street (40 feet wide), as said street is shown on the aforementioned map of Alameda Station Homestead Tract; thence along said northwesterly line of Foley Street, South  $32^{\circ}11'00''$  West, 175.02 feet to its intersection with the northerly line of Tilden Way; thence along the northerly line of Tilden Way, on an arc of a curve to the right having a radius of 1885.08 feet, whose center bears North  $00^{\circ}40'10''$  East, through a central angle of  $09^{\circ}16'07''$ , a distance of 304.95 feet to the point of beginning.

Containing 54,282 square feet more or less.

Portion of APN: 070-0191-032, 033, 034 and 035-01.

PURSUANT TO THE CERTIFICATE OF COMPLIANCE FROM THE  
CITY OF ALAMEDA DATED APRIL 1, 2013 RECORDED CONCURRENTLY  
HEREWITH.

**EXHIBIT B**  
**Legal Description**

**PARCEL B**

Real property situated in the City of Alameda, County of Alameda, State of California, and being a portion of the lands described to Foley Street Investments LLC in the deeds recorded September 22, 2011, as Document No. 2011269364, and 2011269367; and May 13, 2011, as Document 2011144640, Official Records of Alameda County, more particularly described as follows:

Beginning at a point on the southeasterly line of Park Street (80 feet wide) distant thereon North  $32^{\circ}32'54''$  East, 230.84 feet from its intersection with the northerly line of Tilden Way (70 feet wide) as said streets are shown on the map entitled Alameda Station Homestead Tract, filed March 14, 1868 Map Book 17, Page 60, Alameda County Records, thence continuing along said southeasterly line of Park Street North  $32^{\circ}32'54''$  East, 142.22 feet to the most northerly corner of said Foley Street Investment LLC parcel; thence along its exterior boundary lines South  $57^{\circ}45'00''$  East, 129.32 feet; thence South  $32^{\circ}11'00''$  West, 63.00 feet; thence South  $58^{\circ}58'39''$  East, 44.00 feet; thence leaving said exterior boundary lines South  $32^{\circ}19'52''$  West, 30.16 feet; thence North  $57^{\circ}40'08''$  West, 28.89 feet; thence South  $32^{\circ}19'52''$  West, 50.25 feet; thence North  $57^{\circ}40'08''$  West, 145.11 feet to the point of beginning.

Containing 20,523 square feet more or less.

Portion of APN: 070-0191-032, 033 and 035-01.

PURSUANT TO THE CERTIFICATE OF COMPLIANCE FROM THE  
CITY OF ALAMEDA DATED APRIL 1, 2013 RECORDED  
CONCURRENTLY HEREWITH.

**CITY OF ALAMEDA**

When recorded, return to:

City of Alameda  
Public Works Department  
Alameda Point, Building 1  
950 West Mall Square, Room 110  
Alameda, CA 94501-7558  
Attn: City Engineer



2013137558

04/18/2013 08:30 AM

OFFICIAL RECORDS OF ALAMEDA COUNTY  
PATRICK O'CONNELL  
RECORDING FEE 47.00



11 PGS

COPY

CERTIFICATE OF COMPLIANCE

Pursuant to Section 66499.35 of the California Government Code, the City of Alameda hereby records this Certificate of Compliance, having authorized the lot adjustments on APRIL 1<sup>st</sup>, 2013 to the common lines of following Assessor's Parcel Numbers 070-0191-032 (recorded on September 22, 2011, as Document # 2011269364, Alameda County Records), 070-0191-033 (recorded on May 13, 2011, as Document # 2011144640, Alameda County Records), 070-0191-034 (recorded on September 22, 2011, as Document # 2011269366, Alameda County Records), and 070-0191-035-01 (recorded on September 22, 2011, as Document # 2011269367, Alameda County Records). Said adjustment shown on Lot Line Adjustment Map consisting of one (1) sheet attached as Exhibit "A", the old deed descriptions consisting of four (4) sheets attached as Exhibit "B", and the new deed descriptions consisting of two (2) sheets attached as Exhibit "C", incorporated herein by this reference, said lot line adjustment complied with the applicable provisions of Division 2 (commencing with Section 66410 of Title 7 of the California Government Code, and Chapter XXX, Article VI of the Alameda Municipal Code):

NOTICE: This certificate relates only to issues of compliance or non-compliance with the Subdivision Map Act and local ordinances enacted pursuant thereto. The parcel described herein may be sold, leased, or financed without further compliance with the Subdivision Map Act or local ordinance enacted pursuant thereto. Development of the parcel may require issuance of a permit or permits, or other grant or grants of approval.

Owner: *James M Keating*  
(signature)

James M Keating  
(printed name)

2/2/13  
Date

Approved: *Lori Taylor*  
Lori Taylor  
Community Development Director

3.4.13  
Date

Approved: *Barbara Hawkins*  
Barbara Hawkins  
City Engineer

04/01/13  
Date

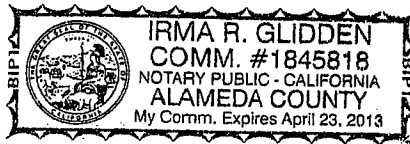
State of California}
County of Alameda}

On 4/10/2013 before me, Irma R. Glidden, a Notary Public,

personally appeared Lori Taylor, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature [Handwritten Signature: Irma R. Glidden] (Seal)

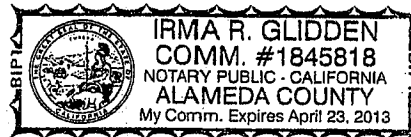
State of California}  
County of Alameda}

On 4/10/2013 before me Irma R. Glidden, a Notary Public,  
(date)  
personally appeared Barbara Hawkins, who  
(signers)

proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that ~~he/she/they~~ executed the same in his/her/their authorized capacity(ies), and that by ~~his/her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Irma R. Glidden (Seal)

State of California )  
County of Alameda )

# CALIFORNIA ALL-PURPOSE CERTIFICATE OF ACKNOWLEDGMENT

On February 12, 2013 before me, Janet L. Van Klompenburg, Notary Public,  
(here insert name and title of the officer)

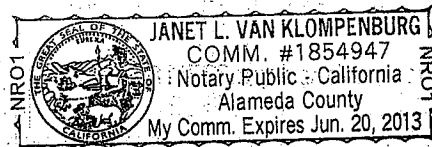
personally appeared James M. Keating

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Janet L. Van Klompenburg



(Seal)

## OPTIONAL INFORMATION

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this acknowledgment to an unauthorized document and may prove useful to persons relying on the attached document.

### Description of Attached Document

The preceding Certificate of Acknowledgment is attached to a document titled/for the purpose of \_\_\_\_\_

containing \_\_\_\_\_ pages, and dated \_\_\_\_\_.

The signer(s) capacity or authority is/are as:

- Individual(s)  
 Attorney-in-Fact  
 Corporate Officer(s)

\_\_\_\_\_  
Title(s)

- Guardian/Conservator  
 Partner - Limited/General  
 Trustee(s)  
 Other: \_\_\_\_\_

representing: \_\_\_\_\_  
Name(s) of Person(s) or Entity(ies) Signer is Representing

### Additional Information

#### Method of Signer Identification

Proved to me on the basis of satisfactory evidence:  
 form(s) of identification     credible witness(es)

Notarial event is detailed in notary journal on:  
Page # \_\_\_\_\_ Entry # \_\_\_\_\_

Notary contact: \_\_\_\_\_

#### Other

- Additional Signer(s)     Signer(s) Thumbprint(s)  
 \_\_\_\_\_



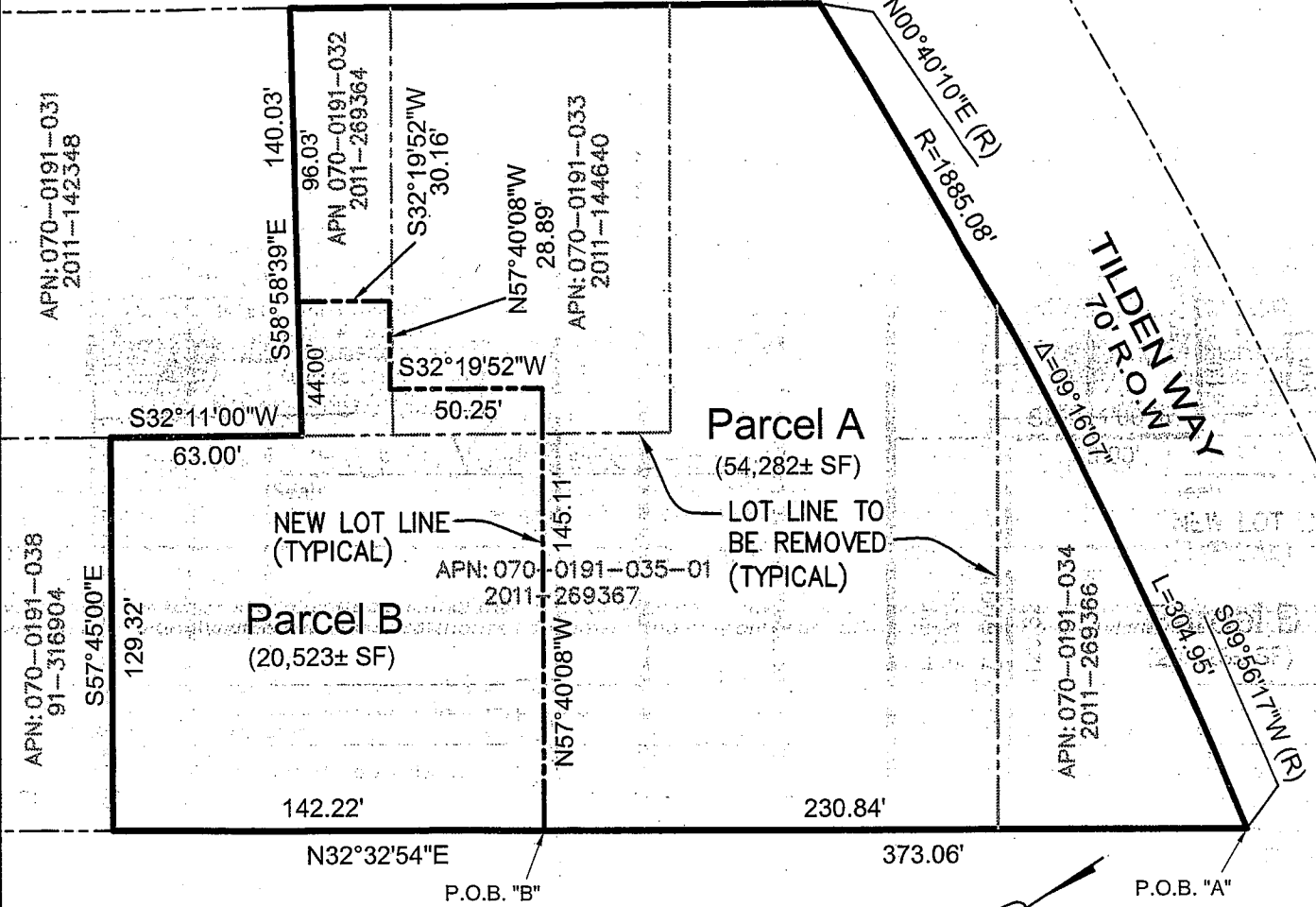
*Izzat S. Nashashibi*

**LEGEND:**

- EXTERIOR BOUNDARY
- LOT LINE TO BE REMOVED
- NEW LOT LINE
- ADJACENT LOT LINE/RIGHT OF WAY
- EASEMENT LINE
- P.O.B. POINT OF BEGINNING
- (R) RADIAL BEARING
- SF SQUARE FEET

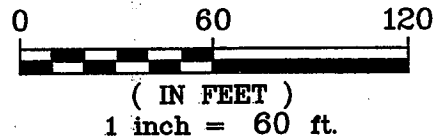
**FOLEY STREET**  
40' R.O.W.

N32°11'00"E 175.02'



**PARK STREET**  
80' R.O.W.

PACIFIC AVENUE



**HUMANN COMPANY INC.**  
ENGINEERING - SURVEYING  
1021 BROWN AVE. LAFAYETTE, CA 94549  
PH (925)283-5000 FAX (925)283-3578

**EXHIBIT "A"**  
**PLAT MAP**  
CITY OF ALAMEDA, CALIFORNIA

SCALE	1" = 60'
DATE	02/01/13
BY	HN/PE
JOB NO.	11064



LEGAL DESCRIPTION

THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA, CITY OF ALAMEDA, AND IS DESCRIBED AS FOLLOWS:

BEING A PORTION OF LOT 11 BLOCK D ALAMEDA STATION HOMESTEAD TRACT FILED MARCH 14, 1868 MAP BOOK 17 PAGE 60 ALAMEDA COUNTY RECORDS, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE WESTERLY LINE OF FOLEY STREET DISTANT THEREON SOUTHERLY 260 FEET FROM THE SOUTHERLY LINE OF BUENA VISTA AVENUE AS SAID STREET AND AVENUE ARE SHOWN ON THE MAP HEREIN REFERRED TO RUNNING THENCE SOUTHERLY ALONG SAID LINE OF FOLEY STREET 33 FEET THENCE AT RIGHT ANGLES WESTERLY AND PARALLEL WITH SAID LINE OF BUENA VISTA AVENUE 140 FEET THENCE AT RIGHT ANGLES NORTHERLY AND PARALLEL WITH SAID LINE OF FOLEY STREET 30 FEET THENCE EASTERLY IN A DIRECT LINE TO THE POINT OF BEGINNING.

APN 070-0191-032

## LEGAL DESCRIPTION

THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA, CITY OF ALAMEDA, AND IS DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT ON THE NORTHWESTERN LINE OF FOLEY STREET DISTANT THEREON TWO HUNDRED NINETY-THREE FEET SOUTHWESTERLY FROM THE POINT OF INTERSECTION THEREOF WITH THE SOUTHWESTERN LINE OF BUENA VISTA AVENUE AS SAID STREET AND AVENUE ARE SHOWN ON THE MAP HEREINAFTER REFERRED TO AND RUNNING THENCE SOUTHWESTERLY ALONG SAID LINE OF FOLEY STREET NINETY-TWO AND 17/100 FEET MORE OR LESS TO THE SOUTHEASTERN BOUNDARY LINE OF LOT NUMBERED 9 IN BLOCK LETTERED "D" AS SAID LOT AND BLOCK ARE SHOWN ON THE MAP HEREINAFTER REFERRED TO THENCE NORTHWESTERLY ALONG SAID SOUTHWESTERN BOUNDARY LINE OF SAID LOT NUMBERED 9 IN BLOCK LETTERED "D" ONE HUNDRED FORTY FEET TO THE NORTHWESTERN BOUNDARY LINE OF SAID LOT NUMBERED 9 IN SAID BLOCK LETTERED "D" THENCE NORTHEASTERLY ALONG SAID NORTHWESTERN BOUNDARY LINE OF SAID LOT NUMBERED 9 IN BLOCK LETTERED "D" FORTY-THREE FEET MORE OR LESS TO THE POINT OF INTERSECTION THEREOF WITH THE SOUTHWESTERN BOUNDARY LINE OF LOT NUMBERED 2 IN SAID BLOCK LETTERED "D" AS SAID LOT AND BLOCK ARE SHOWN ON SAID MAP THENCE RUNNING NORTHWESTERLY ALONG SAID SOUTHWESTERN BOUNDARY LINE OF SAID LOT NUMBERED 2 IN SAID BLOCK LETTERED "D" TEN FEET THENCE NORTHEASTERLY AND PARALLEL WITH SAID LINE OF FOLEY STREET FORTY-TWO FEET TO THE NORTHEASTERN BOUNDARY LINE OF SAID LOT NUMBERED 2 IN SAID BLOCK LETTERED "D" AND THENCE SOUTHEASTERLY ALONG SAID NORTHEASTERN BOUNDARY LINE OF SAID LOT NUMBERED 2 IN SAID BLOCK LETTERED "D" TEN FEET TO THE POINT OF INTERSECTION THEREOF WITH THE NORTHWESTERN BOUNDARY LINE OF LOT NUMBERED 11 IN SAID BLOCK LETTERED "D" AS SHOWN ON SAID MAP AND THENCE NORTHEASTERLY ALONG SAID NORTHWESTERN BOUNDARY LINE OF SAID LOT NUMBERED 11 IN SAID BLOCK LETTERED "D" SEVEN FEET AND THENCE SOUTHEASTERLY IN A DIRECT LINE ONE HUNDRED FORTY FEET TO THE POINT OF COMMENCEMENT ON SAID LINE OF FOLEY STREET

BEING ALL OF LOTS NUMBERED 9 AND 10 AND THE SOUTHWESTERN SEVEN FEET OF LOT NUMBERED 11 AND THE SOUTHEASTERN TEN FEET OF LOT NUMBERED 2 IN BLOCK LETTERED "D" AS SAID LOTS AND BLOCK ARE DELINEATED AND SO DESIGNATED UPON THAT CERTAIN MAP ENTITLED "ALAMEDA STATION HOMESTEAD TRACT FILED MARCH 14, 1868 IN THE OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY IN BOOK 17 OF MAPS PAGE 60

EXCEPTING THEREFROM THE SOUTHEASTERN TEN FEET OF LOT NUMBERED 2 IN BLOCK LETTERED "D" AS SAID LOT AND BLOCK ARE SHOWN ON THE MAP ENTITLED "ALAMEDA STATION HOMESTEAD TRACT" FILED MARCH 14, 1868 IN THE OFFICE OF THE COUNTY RECORDER OF ALAMEDA COUNTY IN BOOK 17 OF MAPS PAGE 60

APN 070-0191-033

LEGAL DESCRIPTION

THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA, CITY OF ALAMEDA, AND IS DESCRIBED AS FOLLOWS:

BEGINNING AT THE POINT OF INTERSECTION OF THE NORTHERN LINE OF TILDEN WAY WITH THE SOUTHEASTERN LINE OF PARK STREET RUNNING THENCE NORTHEASTERLY ALONG THE SAID LINE OF PARK STREET 82 FEET MORE OR LESS TO THE SOUTHWESTERN LINE OF THE PARCEL OF LAND DESCRIBED IN DEED FROM ANDERSON CUMMINGS ET AL TO SUSAN BARLOW DATED SEPTEMBER 15, 1864 AND RECORDED SEPTEMBER 19, 1864 IN BOOK "Q" OF DEEDS PAGE 514 ALAMEDA COUNTY RECORDS RUNNING THENCE SOUTHEASTERLY ALONG THE LAST MENTIONED LINE 172 FEET MORE OR LESS TO SAID LINE OF TILDEN WAY THENCE WESTERLY ALONG THE LAST MENTIONED LINE 191 FEET MORE OR LESS TO THE POINT OF BEGINNING.

APN 070-0191-034

## LEGAL DESCRIPTION

THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA, CITY OF ALAMEDA, AND IS DESCRIBED AS FOLLOWS:

## PARCEL ONE:

BEGINNING AT A POINT ON THE DIVISION LINE BETWEEN THE TRACTS OF LAND KNOWN AS THE HIBBARD TRACT AND THE FOLEY TRACT DISTANT THEREON NORTH 33 DEGREES 30 MINUTES EAST 100 FEET FROM THE SOUTHWESTERN CORNER OF THAT CERTAIN 1 ACRE TRACT OF LAND CONVEYED BY ALBERT J. FOLEY TO ANDERSON CUMMINGS AND CHAS. MCCLEVERTY BY DEED RECORDED SEPTEMBER 13, 1864 IN BOOK "F" OF DEEDS PAGE 764 ALAMEDA COUNTY RECORDS RUNNING THENCE AT RIGHT ANGLES TO SAID DIVISION LINE SOUTH 56 DEGREES 30 MINUTES EAST 40 FEET MORE OR LESS TO A POINT ON THE SOUTHEASTERN LINE OF PARK STREET BEING THE TRUE POINT OF BEGINNING OF THIS DESCRIPTION RUNNING THENCE ALONG SAID LINE OF PARK STREET NORTH 33 DEGREES 30 MINUTES EAST 107 FEET 1 INCH TO THE NORTHEASTERN LINE OF SAID 1 ACRE TRACT THENCE AT RIGHT ANGLES SOUTH 56 DEGREES 30 MINUTES EAST 270 FEET 6-1/4 INCHES MORE OR LESS TO THE NORTHWESTERN LINE OF FOLEY STREET THENCE SOUTHWESTERLY ALONG SAID LINE OF FOLEY STREET TO THE INTERSECTION THEREOF WITH THE NORTHERN LINE OF THE RIGHT OF WAY OF THE SAN FRANCISCO AND ALAMEDA RAILROAD NOW THE CENTRAL PACIFIC RAILWAY COMPANY THENCE WESTERLY ALONG SAID NORTHERN LINE OF SAID RIGHT OF WAY TO A POINT WHERE THE SAME WOULD BE INTERSECTED BY A LINE DRAWN SOUTHEASTERLY FROM THE SAID TRUE POINT OF BEGINNING AND AT RIGHT ANGLES TO SAID LINE OF PARK STREET THENCE NORTH 56 DEGREES 30 MINUTES WEST ALONG SAID LINE SO DRAWN TO THE SAID TRUE POINT OF BEGINNING.

## PARCEL TWO:

BEGINNING AT A POINT ON THE EASTERN LINE OF PARK STREET AS SAID STREET EXISTED PRIOR TO ITS WIDENING TO THE UNIFORM WIDTH OF 80.00 FEET DISTANT THEREON SOUTHERLY 342 FEET 1 INCH FROM THE SOUTHERN LINE OF BUENA VISTA AVENUE AS SAID STREET AND AVENUE ARE SHOWN ON THE MAP HEREINAFTER REFERRED TO RUNNING THENCE EASTERLY PARALLEL WITH THE SAID LINE OF BUENA VISTA AVENUE 140 FEET 3-1/8 INCHES MORE OR LESS TO A POINT ON THE EASTERN BOUNDARY LINE OF LOT 1 IN BLOCK "D" AS SAID LOT AND BLOCK ARE SHOWN ON SAID MAP THENCE AT RIGHT ANGLES SOUTHERLY 42 FEET 1/2 INCH MORE OR LESS TO THE SOUTHEASTERN CORNER OF SAID LOT 1 THENCE WESTERLY ALONG THE SOUTHERN BOUNDARY LINE OF SAID LOT 1 A DISTANCE OF 140 FEET 6-1/4 INCHES TO THE SAID EASTERN LINE OF PARK STREET THENCE NORTHERLY ALONG SAID LAST NAMED LINE 42 FEET MORE OR LESS TO THE POINT OF BEGINNING.

BEING A PORTION OF LOT 1 IN BLOCK "D" ACCORDING TO THE MAP OF ALAMEDA STATION HOMESTEAD TRACT FILED MARCH 14, 1868 IN BOOK 17 OF MAPS PAGE 60 ALAMEDA COUNTY RECORDS

## PARCEL THREE:

LOTS 3 AND 4 AND ALL THAT PORTION OF LOT 2 BLOCK "D" WHICH LIES WESTERLY OF A LINE DRAWN PARALLEL WITH THE EASTERN LINE OF SAID LOT 2 AND DISTANT 10 FEET WESTERLY THEREFROM MEASURED ALONG THE SOUTHERN LINE OF SAID LOT 2 AS SAID LOTS AND BLOCK ARE SHOWN ON THE MAP OF ALAMEDA STATION HOMESTEAD TRACT FILED MARCH 14, 1868 MAP BOOK 17 PAGE 60 ALAMEDA COUNTY RECORDS.

EXCEPTING THEREFROM THAT PORTION THEREOF TAKEN FOR THE WIDENING OF PARK STREET AS SAID STREET IS SHOWN ON SAID MAP.

## PARCEL FOUR:

THE EASTERN 10 FEET OF LOT 2 IN BLOCK "D" AS SAID LOT AND BLOCK ARE SHOWN ON THE MAP OF ALAMEDA STATION HOMESTEAD TRACT FILED MARCH 14, 1868 MAP BOOK 17 PAGE 60 ALAMEDA COUNTY RECORDS.

APN 070-0191-035-01

**EXHIBIT C**  
**Legal Description**

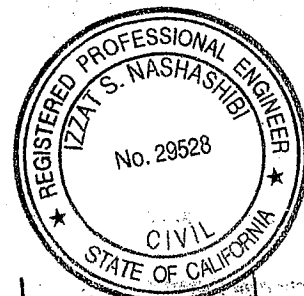
**PARCEL A**

Real property situated in the City of Alameda, County of Alameda, State of California, and being a portion of the lands described to Foley Street Investments LLC in the deeds recorded September 22, 2011, as Document No. 2011269364, 2011269366 and 2011269367; and May 13, 2011, as Document 2011144640, Official Records of Alameda County, more particularly described as follows:

Beginning at the point of intersection of the southeasterly line of Park Street (80 feet wide) and the northerly line of Tilden Way (70 feet wide), as said streets are shown on the map entitled Alameda Station Homestead Tract, filed March 14, 1868 Map Book 17, Page 60, Alameda County Records; thence continuing along said southeasterly line of Park Street North  $32^{\circ}32'54''$  East, 230.84 feet; thence leaving last line South  $57^{\circ}40'08''$  East, 145.11 feet; thence North  $32^{\circ}19'52''$  East, 50.25 feet; thence South  $57^{\circ}40'08''$  East, 28.89 feet; thence North  $32^{\circ}19'52''$  East, 30.16 feet to a point on the northeasterly exterior of said Foley Street Investment LLC property; thence along said northeasterly exterior line, South  $58^{\circ}58'39''$  East, 96.03 feet to a point on the northwesterly line of Foley Street (40 feet wide), as said street is shown on the aforementioned map of Alameda Station Homestead Tract; thence along said northwesterly line of Foley Street, South  $32^{\circ}11'00''$  West, 175.02 feet to its intersection with the northerly line of Tilden Way; thence along the northerly line of Tilden Way, on an arc of a curve to the right having a radius of 1885.08 feet, whose center bears North  $00^{\circ}40'10''$  East, through a central angle of  $09^{\circ}16'07''$ , a distance of 304.95 feet to the point of beginning.

Containing 54,282 square feet more or less.

Portion of APN: 070-0191-032, 033, 034 and 035-01.



*Izzat S. Nashashibi*

**EXHIBIT C**  
**Legal Description**

**PARCEL B**

Real property situated in the City of Alameda, County of Alameda, State of California, and being a portion of the lands described to Foley Street Investments LLC in the deeds recorded September 22, 2011, as Document No. 2011269364, and 2011269367; and May 13, 2011, as Document 2011144640, Official Records of Alameda County, more particularly described as follows:

Beginning at a point on the southeasterly line of Park Street (80 feet wide) distant thereon North  $32^{\circ}32'54''$  East, 230.84 feet from its intersection with the northerly line of Tilden Way (70 feet wide) as said streets are shown on the map entitled Alameda Station Homestead Tract, filed March 14, 1868 Map Book 17, Page 60, Alameda County Records, thence continuing along said southeasterly line of Park Street North  $32^{\circ}32'54''$  East, 142.22 feet to the most northerly corner of said Foley Street Investment LLC parcel; thence along its exterior boundary lines South  $57^{\circ}45'00''$  East, 129.32 feet; thence South  $32^{\circ}11'00''$  West, 63.00 feet; thence South  $58^{\circ}58'39''$  East, 44.00 feet; thence leaving said exterior boundary lines South  $32^{\circ}19'52''$  West, 30.16 feet; thence North  $57^{\circ}40'08''$  West, 28.89 feet; thence South  $32^{\circ}19'52''$  West, 50.25 feet; thence North  $57^{\circ}40'08''$  West, 145.11 feet to the point of beginning.

Containing 20,523 square feet more or less.

Portion of APN: 070-0191-032, 033 and 035-01.



*Izzat S. Nashashibi*