DRAFT
PESTICIDE REMEDIATION AND RISK MANAGEMENT PLAN

FORMER NURSURY SITE
2519 PULGAS AVENUE
EAST PALO ALTO, CALIFORNIA

Prepared for:

TARLTON PROPERTIES

March 2008

STELLAR
ENVIRONMENTAL SOLUTIONS, INC.
GEOSCIENCE & ENGINEERING CONSULTING

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Prepared for:

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955 ALMA STREET
PALO ALTO, CALIFORNIA

Prepared by:

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March 21, 2008

Project No. 2007-73

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March 21, 2008

Mr. Mark Johnson
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, California 94612

Subject: Remediation and Risk Management Plan for
Former Cut Flower Nursery Site – 2519 Pulgas Avenue, East Palo Alto, California

Dear Mr. Johnson:

On behalf on Tarlton Properties, Stellar Environmental Solutions, Inc. is submitting this Remediation and Risk Management Plan for the Former Cut Flower Nursery Site, located at 2519 Pulgas Avenue in East Palo Alto, California. Tarlton Properties intends to remediate and redevelop the site, as presented in this Plan.

This Plan presents the findings of the February 2008 field work that augments previously collected data. A site conceptual model is presented, along with the remedial action plan to encapsulate the residual pesticide and metals contamination in the soil and groundwater media. These data are evaluated to determine offsite contamination, delineate the contaminant plume boundary, develop a conceptual model of contaminant migration, and evaluate the effectiveness of the remedial trenching.

We declare, under penalty of perjury, that the information and/or recommendations contained in the attached document are true and correct to the best of our knowledge. If you have any questions regarding this report, please contact us at (510) 644-3123.

Sincerely,

Henry Pietropaoli, R.G., R.E.A.
Project Manager

Richard S. Makdisi, R.G., R.E.A.
Principal

cc: Mr. Tig Tarlton, Tarlton Properties

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1.0 INTRODUCTION AND BACKGROUND

INTRODUCTION

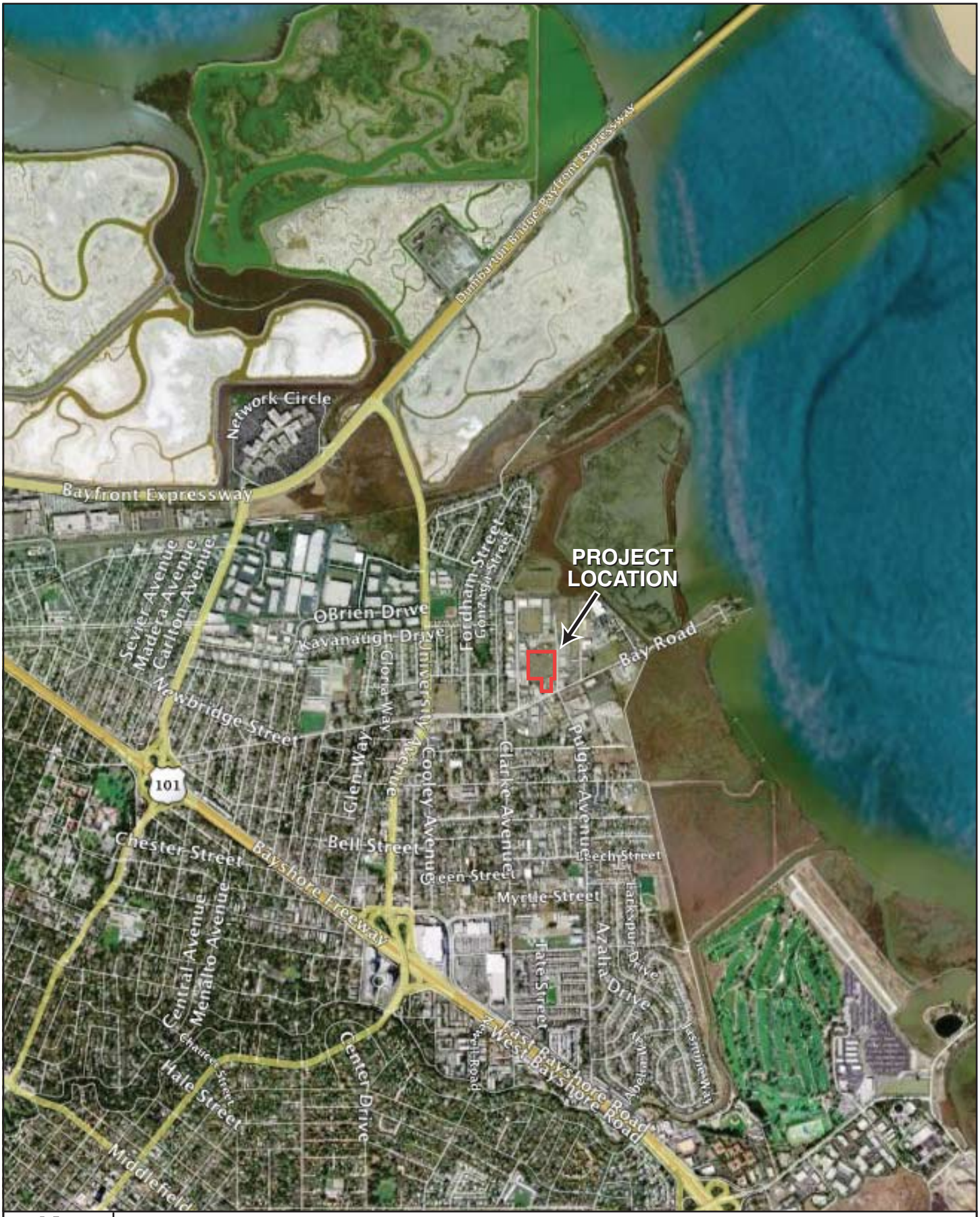
Tarlton Properties of Palo Alto, California (the future developer of the subject site [site], located at 2519 Pulgas Avenue in East Palo Alto) retained Stellar Environmental Solutions, Inc. (SES) to conduct an environmental investigation of pesticide contamination at the site and an adjoining property at 1885 Bay Road. Exploratory boring and sampling activities were conducted on February 21, 2008 to augment existing site data on the 2519 Pulgas Avenue parcel and obtain baseline soil and groundwater data for the 1885 Bay Road parcel.

The SES remedial investigative activities included the advancement of seven onsite soil borings, in which a total of ten soil samples and six grab-groundwater samples were collected. This report presents the findings of that investigation, which was outlined in our February 13, 2008 work plan in compliance with a request by the Regional Water Quality Control Board (Water Board) for further site characterization.

Figure 1 is a site location map. Figure 2 is a site plan showing the locations of recent and historical borings and test pits.

SUBJECT PROPERTY DESCRIPTION AND HISTORY

The project site is located to the east of Pulgas Avenue, just north of the northwest quadrant of the intersection of Pulgas Avenue and Bay Road. The site comprises more than 5 acres that was historically occupied by the Satoru Iwasaki Nursery, a flower production greenhouse. The majority of the Pulgas Avenue parcel is unpaved, undeveloped former planting ground with several structures—including two greenhouses, a warehouse, a former boiler room, and a residence (currently occupied)—all located in the southeastern sector of the site. The 1885 Bay Road property is an irregular quadrilateral-shaped, approximately 0.75-acre parcel, and is currently occupied by A's Towing and a residence. The 1885 Bay Road parcel is paved with asphalt and concrete, and extends north from Bay Road to where it adjoins the south side of the 2519 Pulgas Avenue parcel.



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SITE LOCATION MAP

2519 Pulgas Ave. East Palo Alto, CA	By: MJC	FEBRUARY 2008
	Figure 1	

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SITE PLAN SHOWING LOCATION OF BORINGS AND HISTORICAL USAGE

2519 Pulgas Ave. East Palo Alto, CA	By: MJC	MARCH 2008
	Figure 2	

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2007-73-07

Petroleum hydrocarbons related to onsite former leaking underground fuel storage tanks (USTs) have been documented in the southeastern sector of the site. An aboveground pesticide/fertilizer mixing tank was reported to be located within the existing cutting (greenhouse) room directly behind the residence, and is also reported in a Phase I Environmental Site Assessment (ESA) by ICES Consulting Group (ICES, 2005). The mixing tank is no longer onsite; however, SES observed pier block footings at this location that may have supported the former tank. Residual pesticides have been detected in soil and groundwater at the Pulgas Avenue parcel in previous investigations by ICES Consulting Group and in this investigation by SES.

Analytical data of pesticide contamination collected during the ICES Consulting Group investigations (ICES 2006a; ICES 2006b; ICES 2007) have been summarized and included with the SES analytical data collected during this investigation in Table 1 and 2 in Section 4.0. Appendix B contains historical analytical data and figures.

Historical Remedial Activity

<u>1977 to 1997 - UST Remedial Activity</u>

SES conducted a historical file review of UST removal activities, pertinent documents of which are listed in Section 9.0, References. The site historically utilized three USTs: a 10,000-gallon diesel UST installed in 1977 and removed in 1994; a 2,000-gallon diesel UST installed at an unknown date and removed in 1986; and a 1,000-gallon unleaded gasoline UST installed in 1972 and removed in 1992. A preliminary site investigation conducted by ICES in 1994 advanced eight exploratory test pits to determine the extent of petroleum hydrocarbon-affected soils. Sample analyses showed limited hydrocarbon contamination, with high concentrations of:

- gasoline-range hydrocarbons at 520 milligrams per kilogram (mg/kg)
- diesel-range hydrocarbons at 60 mg/kg
- benzene at 0.7 mg/kg or less
- toluene at up to 0.59 mg/kg
- ethylbenzene at up to 5.5 mg/kg
- xylenes at 9.2 mg/kg or less

A Remedial Action Plan (RAP) was prepared (ICES, 1994c) to address site residual hydrocarbon contamination. All three tanks received closure by the Water Board on May 8, 1997. The State Water Resources Control Board GeoTracker database shows that the site received Leaking Underground Storage Tank Clean-Up Fund reimbursement in the amount of $10,827, and

erroneously states that remediation entailing soil excavation and treatment was conducted in April 2000. A copy of the UST closure letter is contained in Appendix B.

1993 – RIA Site Area and Saturo Nursery Chemical Use History

The site is in the Ravenswood Industrial Area which, according to the Water Board, is an area containing approximately 50 properties that comprise the 100 plus acre Ravenswood Industrial Area (RIA) of East Palo Alto. The RIA has been used for agriculture and a variety of industrial purposes for approximately 75 years. Two of the sites in the RIA have had significant hazardous material releases and have been under regulatory oversight; the Romic Site located at 1981 Bay Road, and the former Chipman Chemical facility located at 1990 Bay Road. The United States Environmental Protection Agency (USEPA) and the Regional Water Quality Control Board (Water Board) have regulated response actions on these two facilities. In addition, the many auto salvage yards within the RIA with their poor chemical handling practices, led many to believe the RIA was significantly impacted by pollutants. In an effort to revitalize the RIA, the East Palo Alto Redevelopment Agency designated it as a "redevelopment project area" in late 1980s invoking redevelopment authority. In order to improve water quality and abate environmental impacts, as well as assist East Palo Alto in their efforts, the Water Board adopted Site Cleanup Requirements for the RIA "Site" in 1992. These Orders (Nos. 92-037 and 92-086) set forth tasks to: 1) conduct site use histories of the properties, 2) prepare workplans for investigations, and 3) submit the results of investigations and propose additional investigations as necessary.

The desire of the East Palo Alto Redevelopment Agency to revitalize the RIA led USEPA, as part of a Regional Brownfield Pilot Project, to implement an area wide soil and groundwater investigation in 1995. While not as detailed as that proposed by each of the individual property owners, this investigation was adequate to gauge the general magnitude of the conditions within the RIA. The results of this investigation found that the RIA (not including Romic or the former Chipman Chemical facility) was not as significantly impacted as previously thought. While additional assessment and remediation would be necessary on some of the individual properties, the RIA as a whole did not pose a significant threat to human health or the environment in its current commercial/industrial land use. This being the case, additional assessment and remediation could be conducted concurrent with and funded by the redevelopment of the individual properties.

Saturo Nursery is one of the RIA sites under the Water Board order was therefore requested by the Water Board to conduct an environmental assessment. In response to this, the previous owners consultant, ICES Consulting Group, prepared a site Chemical Use History and Associated Site Investigation Workplan (ICES, 1993). The ICES report concluded that the site could potentially be impacted by fungicides and pesticides utilized onsite over the past 40 years,

and recommended conducting a preliminary investigation to access the potential impact of petroleum hydrocarbons and pesticides so that the subsurface soil and groundwater at the site and surrounding properties could be characterized. The study identified 16 sites in the nearby surrounding area that could potentially have impacted the subject site.

2005 – Phase I Environmental Site Assessment

A Phase I Investigation (ICES, 2005) at the request of a prospective buyer was completed in 2005 in which it was concluded that no surrounding properties currently or historically posed a negative environmental threat to the subject site. A pesticide/fertilizer mixing tank was reported to be located within the cutting (greenhouse) area directly behind the residence. The document recommended that the potential buyer conduct a soil sampling investigation for the potential presence of organochlorine pesticides, as well as the metals arsenic, lead, and mercury.

2006 – Supplementary Site Investigation

At the request of Westpark II, a Limited Site Investigation (ICES, 2006a) was completed that entailed the collection of 20 soil samples for analysis of organochlorine pesticides, as well as the metals arsenic, lead, and mercury. Only arsenic was detected at concentrations above the Water Board Environmental Screening Level (ESL); however, the arsenic concentration was within background range and thus was not considered to be a contaminant of concern (COC). Test pit samples were collected from 6 to 9 inches below ground surface (bgs) and 15 to 18 inches bgs. Analysis of the samples found the pesticide dieldrin above regulatory levels of concern in all of the samples (at concentrations ranging from 0.018 to 1.6 mg/kg) and chlordane in one sample from 15 to 18 inches bgs. These high concentrations prompted ICES to conduct a Supplementary Site Investigation (ICES, 2006b) in April, in which ten additional soil samples from 3 and 4 feet bgs and grab-groundwater samples were collected. Only one soil sample, from 3 feet bgs, contained concentrations of dieldrin at levels of regulatory concern. Groundwater from all of the borings contained concentrations of one or more of the organochlorine pesticides—dieldrin, DDT, DDE, and chlordane—at levels of regulatory concern. However, the groundwater samples were not filtered and were turbid, and thus not representative of the dissolved fraction of pesticides.

July 20, 2007 – Groundwater Investigation

At the request of the Water Board, additional groundwater samples (two onsite and three offsite) were collected and analyzed for organochlorine pesticides. Dieldrin was detected above regulatory levels of concern in the two onsite grab-groundwater samples; however, none of the offsite samples indicated pesticide migration via groundwater off the subject site. High turbidity may have contributed to the high concentrations previously detected in the May 2006

investigation; therefore, the analytical laboratory was requested to filter the samples collected in this investigation prior to analysis. Review of this document revealed a request for filtering noted on the chain of custody; however, there was no indication in the investigation report or the laboratory report that filtering was done.

November 2007 – Bench Scale Bioremediation Assessment

Biotech Restoration, LLC, completed a remedial bench study on the site in November 2007 (Biotech, 2007). Based on the results of the bench study, Biotech Restoration, LLC prepared a workplan to determine the effectiveness of "Select Factor Treatments." The study treatments showed some reduction in the pesticide concentrations in site soils; however, contaminant concentrations were not reduced to levels below regulatory concern in the 12 weeks of monitoring. The remedy was therefore rejected as inadequate to achieve the objectives.

2.0 PHYSICAL SETTING

The mean elevation of the subject site is approximately 12 feet above mean sea level (amsl), and the general topographic gradient in the site vicinity is flat with no discernible slope. The nearest surface water body is an evaporation pond isolation channel located about 1,600 feet northeast of the site, and drains into San Francisco. San Francisco Bay wetland areas are located approximately 1,600 feet east of the site.

Shallow site lithology was determined in this investigation using the visual method of the Unified Soils Classification System (USCS) using continuous core soil samples from the borehole program. Lithologic units encountered during this investigation were typically 1- to 6-foot-thick gray to dark brown clayey silt to fine sand overlying a medium yellow-brown coarse sandy to gravelly clayey fine sand encountered at a depth of 5 to 7 feet bgs across the site.

Groundwater was encountered in all of the boreholes at about 7 feet bgs, with the exception of boring B6 in the northwestern corner of the Pulgas parcel, where it was encountered at approximately 6 feet bgs. Groundwater flow direction was not determined during this investigation, but based on regional flow patterns is presumed to be to the north-northeast, toward San Francisco Bay.

3.0 FEBRUARY 2008 FIELD INVESTIGATION

This section summarizes site investigation activities and regulatory agency notifications. Appendix A contains photodocumentation of the field activities. Appendix B contains historical analytical data and regulatory communication. Regulatory notification and permits associated with the field work are included in Appendix C. The certified analytical laboratory reports and chain-of-custody records for environmental samples are included as Appendix D.

PROJECT PARTICIPANTS

The following companies or agencies were involved in the work for this investigation:

- Stellar Environmental Solutions, Inc. (Berkeley, CA). Tarlton Properties' environmental consultant responsible for overall project management, geologic logging, and environmental sampling.
- McCampbell Analytical, Inc. (Pittsburg, CA). Environmental laboratory for soil and groundwater sample analyses, certified by the State of California Environmental Laboratory Accreditation Program.
- Agricultural well abandonment (to be determined).
- Environmental Control Associates (Aptos, CA) (CA contractor's license No. C57-695970). SES's subcontractor for drilling and sampling.
- Regional Water Quality Control Board (Oakland, CA). Workplan concurrence.
- San Mateo County Department of Environmental Health (SMDEH) (Redwood City, CA). Drilling and well abandonment permits.

SCOPE OF WORK

The SES scope of work consisted of: pre-field work planning (including permitting and laboratory/drilling subcontractor procurement); borehole drilling and sampling; decontamination and bore abandonment; agricultural well abandonment; laboratory analysis; and preparation of a technical documentation report. These are discussed in detail below.

Pre-Field Work Planning

Permitting and Clearances

- Obtained work plan concurrence from the Water Board.
- Obtained a drilling permit from the SMDEH and arranged for boring grout inspections.
- Visited the site to mark drilling locations, prior to notifying Underground Service Alert of Northern California (USA North) — ticket #056109 for Pulgas Avenue and ticket #056121 for Bay Road. USA North is responsible for notifying local utility companies to conduct a site-specific survey and mark underground utilities.

SES also notified the SMDEH of the fieldwork schedule; however, no County inspections were required during the field work.

Rationale for Borehole Locations and Sampling

The boreholes were placed in locations to supplement data in the previous ICES consultants' investigations. All boring and sampling locations and depths were selected in concurrence with the Water Board to delineate data gaps in the areal and vertical extent of site pesticide contamination, and to locate the potential pesticide contaminant source.

Borehole Drilling and Sampling

On February 21, 2008, seven exploratory investigation boreholes were advanced using a Geoprobe 6410 direct-push drill rig. Borehole drilling was conducted by Environmental Control Associates (Aptos, CA) (contractor's license No. C57-695970) under the direct supervision of a SES California registered geologist. Six borings were advanced on the Pulgas Avenue parcel, and one boring was advanced on the Bay road parcel. Continuous soil cores were collected in acetate sleeves for geologic logging using the visual method of the USCS. Soil samples retained for analysis were appropriately sealed with Teflon® tape and plastic labeled, placed in a cooler with ice, and transported under chain-of-custody documentation to the laboratory. Soil sample depths are shown on the analytical results tables (Tables 1 and 2) at the end of this section.

Groundwater was encountered in all of the boreholes. A grab-groundwater sample was collected utilizing a temporary PVC screen extending between 5 and 9 feet bgs for all borings. Grab-groundwater samples were collected using a peristaltic pump, with new Tygon® tubing utilized at each bore. The groundwater was transferred to unpreserved 1-liter amber bottles. Grab-groundwater analytical results are discussed in Section 5.0.

Appendix A contains photodocumentation of the drilling and sampling. Boring locations are shown on Figure 2 (in Section 1.0).

Decontamination Procedures and Bore Abandonment

All downhole equipment used for borehole drilling and sampling was decontaminated before each boring location. All surfaces of the sampling equipment and materials were washed with water until all visible dirt, grime, and grease was rinsed from the equipment. The boreholes were backfilled with a neat cement-plus-water slurry.

Agricultural Well Abandonment

One groundwater agricultural well was located on the Pulgas Avenue parcel just north of the residence in the southeastern corner of the site. The well was installed in 1977 and extended to a total depth of 280 feet with steel casing and a slotted interval from 232 to 280 feet bgs. The well will be abandoned before the start of the redevelopment. The decommissioning will follow San Mateo County guidance documents, which calls for closure in place by tremie grouting from the bottom of the well. The well will be grouted with cement slurry under the direction of SES. The upper steel casing will be cut to 5 feet below grade as per SMDEH requirements.

Laboratory Analysis

Soil and groundwater samples were analyzed using the following methods for:

- Organochlorine pesticides by EPA Method 8081B

At the request of the Water Board, the groundwater samples were filtered through a 0.45-micron filter at the laboratory prior to analysis. All investigational soil and groundwater samples were analyzed by McCampbell Analytical, Inc., a laboratory certified by the State of California Environmental Laboratory Accreditation Program.

<u>Laboratory Quality Control</u>

Laboratory quality control (QC) samples (e.g., method blanks, matrix spikes, surrogate spikes) were analyzed by the laboratory in accordance with requirements of each analytical method. All laboratory QC sample results and sample holding times were within the acceptance limits of the methods.

Certified analytical laboratory reports and chain of custody documentation are contained in Appendix D.

LABORATORY ANALYTICAL RESULTS

Analytical data from the 2006 and 2007 ICES Consulting Group investigations have been summarized in Tables 1 and 2, along with data collected during this investigation. The distribution of site organochlorine pesticide contamination by depth is shown on Figure 3.

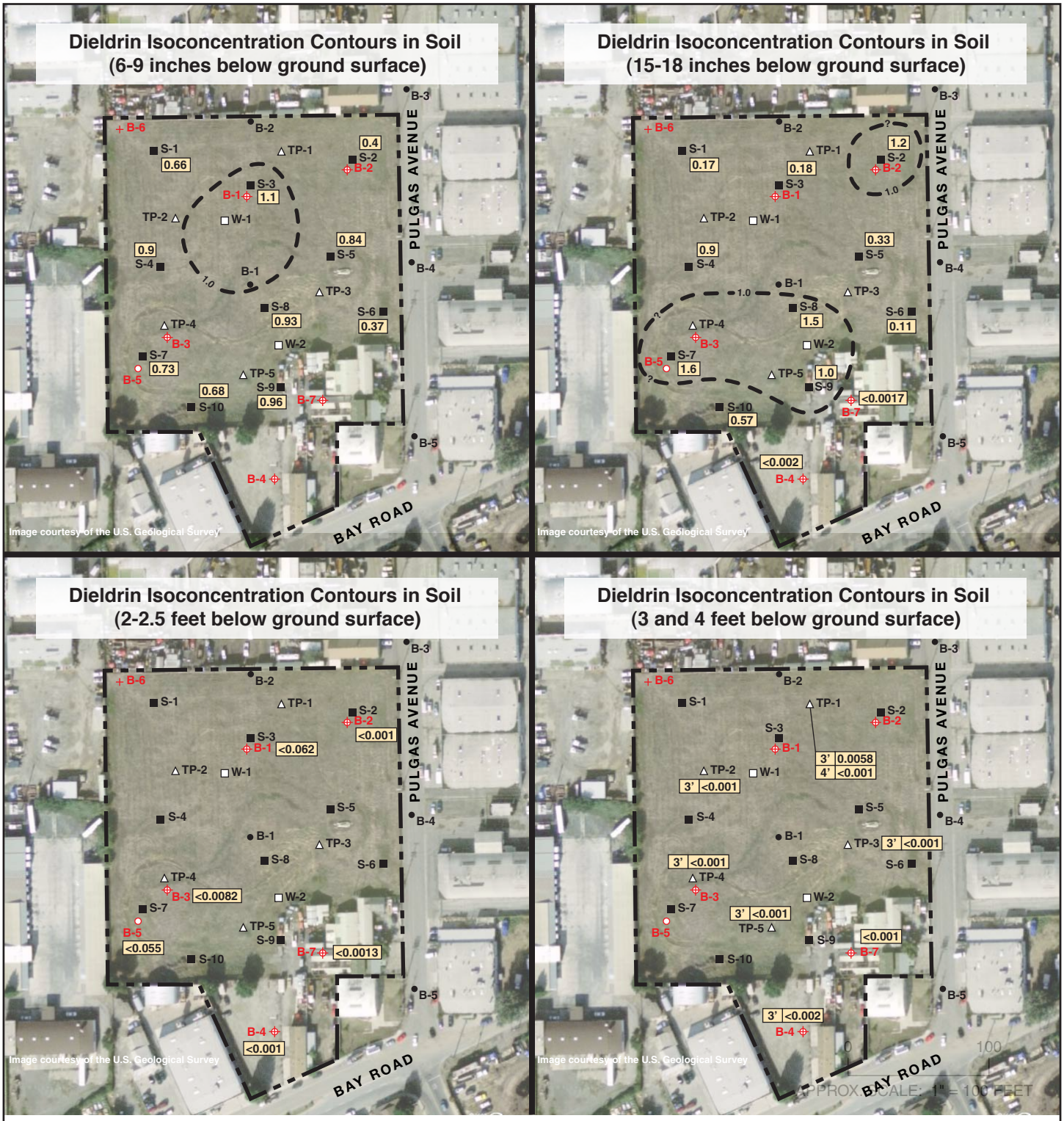
Figure 4 presents a cross-section showing average distribution by depth of dieldrin, the most commonly detected site contaminant. Figure 5 shows the distribution of dieldrin in groundwater. Appendix B contains historical analytical data and figures. Certified analytical laboratory reports and chain-of-custody documentation are contained in Appendix D.

Soil Analytical Results

As seen in Table 1, analysis of onsite soil samples collected during this and previous investigations showed the organochlorine pesticides dieldrin and chlordane at concentrations above regulatory concern. A total of 36 soil samples, taken from the surface to 36 inches bgs and 1 sample from 4 feet bgs, of native soil on the site were collected in 2006 and 2007 and analyzed for organochlorine pesticides. All of the site native soil samples collected at 6 to 9 inches and 15 to 18 inches bgs, along with three samples from 2.0 to 2.5 feet bgs and one sample from 3 feet bgs, contained dieldrin above the regulatory groundwater protection ESL of 0.0034 mg/kg. Chlordane was detected in one sample collected during the ICES Consulting Group February 2006 investigation above regulatory ESLs, but the chlordane toxicity and persistence are overshadowed by that of dieldrin, the principal COC. Trace concentrations of b-BHC, DDD, DDE, DDT, and endrin were also detected. Contaminant concentrations are generally distributed across the site with no areal pattern.

Groundwater Analytical Results

As seen in Table 2, only one grab-groundwater sample collected during this investigation (at boring B1 in the north central area of the parcel) showed dieldrin—at a concentration of 0.061 microgram per liter (µg/L), which is above the regulatory ESL of 0.0022 µg/L for commercial/industrial sites where groundwater is a drinking water resource but below the non-drinking water resource of 2,500 µg/L. No other organochlorine pesticides were detected. Samples collected in previous investigations showed chlordane, DDE, DDT, and endrin; however, it is suspected that these were contaminant detections in colloidal material and not representative of site groundwater.



LEGEND

- ● **B-2** Grab groundwater location (ICES, July 2007)
- ■ **S-1** Test pit location (ICES, February 2006)
- △ **TP-1** Test pit location (ICES, April 2006)
- ND = none detected above laboratory reporting limit (0.001 mg/kg)
- □ **W-1** Test pit location (ICES, September 2006)
- ⊕ **B-1** Boring location ○ /grab groundwater location + (SES, February 2008)
- 1.0 Dieldrin isoconcentration contour (mg/kg)
- <0.001 Concentrations in milligrams per kilogram (mg/kg)
- Property boundary

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DIELDRIN ISOCONCENTRATION CONTOURS IN SOIL WITH DEPTH

2519 Pulgas Ave.
East Palo Alto, CA

By: MJC | FEBRUARY 2008

Figure 3

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DISTRIBUTION OF DIELDRIN IN SHALLOW GROUNDWATER

2519 Pulgas Ave.
East Palo Alto, CA

By: MJC | FEBRUARY 2008

Figure 4

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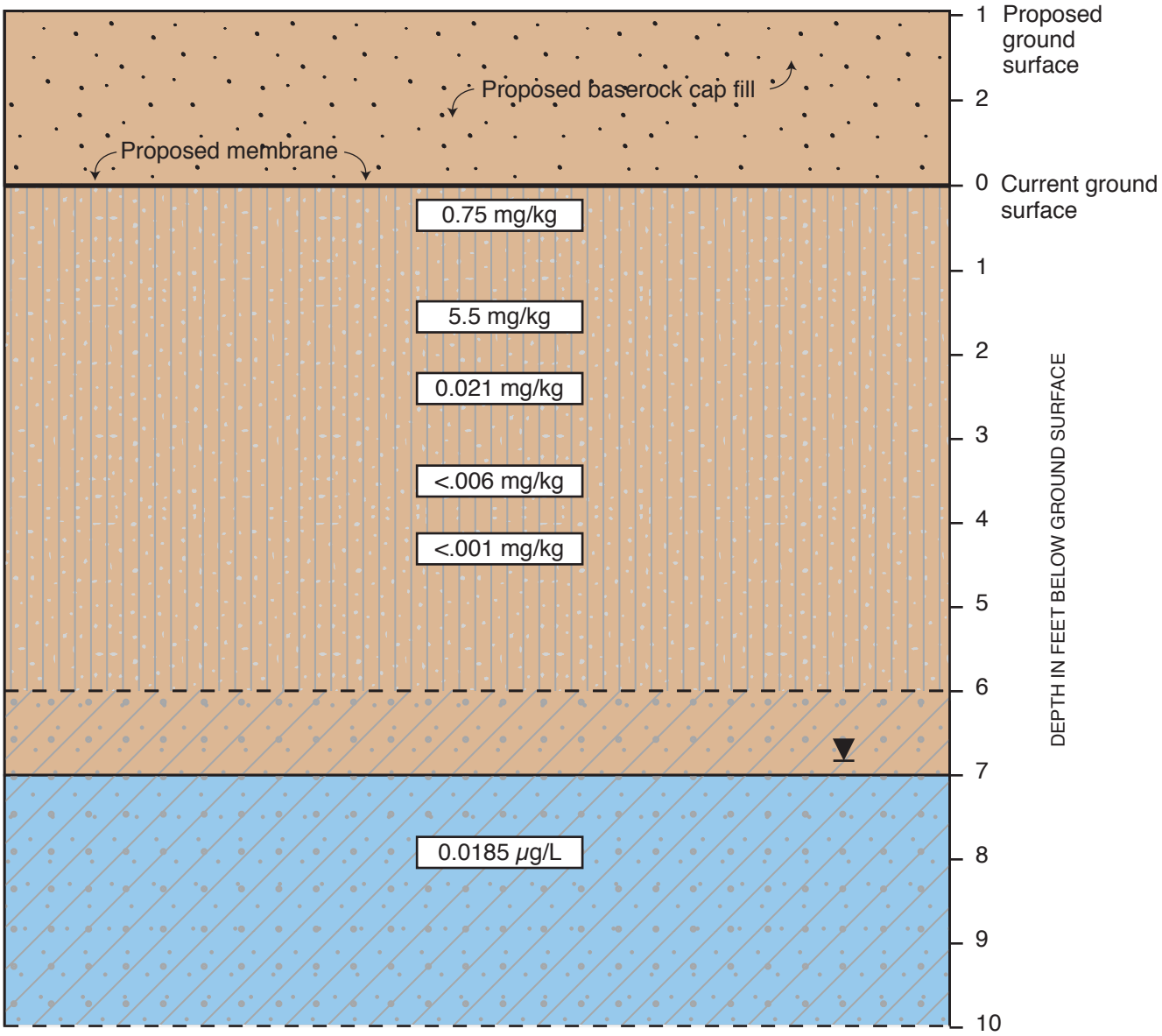
2007-73-04



LEGEND

0.75 mg/kg	Concentration of dieldrin in soil in milligrams per kilogram
0.0185 µg/L	Concentration of dieldrin in groundwater in micrograms per Liter
▼	Approximate groundwater level (Feb. 21, 2008)
	Clayey silt to fine sand
	Clayey coarse to fine sand
	Vadoze zone
	Saturated zone

Vertical scale:1 inch =2 feet

N

GENERALIZED SITE CROSS-SECTION SHOWING AVERAGE CONCENTRATIONS OF DIELDRIN DISTRIBUTION WITH DEPTH

2519 Pulgas Ave.
East Palo Alto, CA

By: MJC | FEBRUARY 2008

Figure 5

STELLAR ENVIRONMENTAL SOLUTIONS, INC
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2007-73-06

Table 1
Organochlorine Pesticide Concentrations (mg/kg) in Soil
2519 Pulgas Avenue, East Palo Alto, California

Sampling Date	Sampling Firm	Sample ID	Sample Depth	Detected Concentrations								
				b-BHC	chlordane	a-chlordane	g-chlordane	DDD	DDE	DDT	dieldrin	endrin
2/3/2006	ICES	S-1	6-9 inches	*<0.02*	*<0.5*	*<0.02*	*<0.02*	*<0.02*	0.15	0.08	**0.66**	*<0.02*
2/3/2006	ICES	S-2	6-9 inches	*<0.02*	*<0.5*	*<0.02*	*<0.02*	*<0.02*	0.12	0.065	**0.4**	*<0.02*
2/3/2006	ICES	S-3	6-9 inches	*<0.02*	*<0.5*	*<0.02*	*<0.02*	0.022	0.2	0.083	**1.1**	0.034
2/3/2006	ICES	S-4	6-9 inches	*<0.02*	*<0.5*	0.063	0.041	0.034	0.3	0.18	**0.9**	0.023
2/3/2006	ICES	S-5	6-9 inches	*<0.02*	*<0.5*	*<0.02*	*<0.02*	0.027	0.15	0.082	**0.84**	0.027
2/3/2006	ICES	S-6	6-9 inches	*<0.01*	*<0.25*	0.044	0.026	0.013	0.12	0.075	**0.37**	*<0.01*
2/3/2006	ICES	S-7	6-9 inches	*<0.02*	*<0.5*	*<0.02*	*<0.02*	*<0.02*	0.16	0.093	**0.73**	0.029
2/3/2006	ICES	S-8	6-9 inches	*<0.05*	*<1.2*	0.073	0.062	*<0.05*	0.14	0.1	**0.93**	*<0.05*
2/3/2006	ICES	S-9	6-9 inches	*<0.05*	*<1.2*	*<0.05*	*<0.05*	*<0.05*	0.16	0.084	**0.96**	*<0.05*
2/3/2006	ICES	S-10	6-9 inches	*<0.05*	*<1.2*	*<0.05*	*<0.05*	*<0.05*	0.14	0.065	**0.68**	*<0.05*
2/14/2006	ICES	S-1A	15-18 inches	*<0.01*	*<0.25*	*<0.01*	*<0.01*	*<0.01*	0.05	0.033	**0.17**	*<0.01*
2/14/2006	ICES	S-2A	15-18 inches	0.034	*<0.5*	0.096	0.08	0.032	0.36	0.3	**1.2**	0.049
2/14/2006	ICES	S-3A	15-18 inches	0.018	*<0.25*	*<0.01*	*<0.01*	*<0.01*	0.13	0.058	**0.018**	*<0.01*
2/14/2006	ICES	S-4A	15-18 inches	*<0.02*	*<0.5*	*<0.02*	*<0.02*	*<0.02*	0.24	0.19	**0.48**	*<0.02*
2/14/2006	ICES	S-5A	15-18 inches	0.042	*<0.5*	0.065	0.047	*<0.02*	0.37	0.32	**0.33**	*<0.02*
2/14/2006	ICES	S-6A	15-18 inches	*<0.01*	**0.8**	0.11	0.09	*<0.01*	0.065	0.039	**0.11**	*<0.01*
2/14/2006	ICES	S-7A	15-18 inches	*<0.05*	*<1.2*	<0.05	<0.05	*<0.05*	0.3	0.2	**1.6**	*<0.05*
2/14/2006	ICES	S-8A	15-18 inches	*<0.05*	*<1.2*	0.081	0.062	*<0.05*	0.11	0.16	**1.5**	*<0.05*
2/14/2006	ICES	S-9A	15-18 inches	*<0.05*	*<1.2*	<0.05	<0.05	*<0.05*	0.21	0.12	**1**	*<0.05*
2/14/2006	ICES	S-10A	15-18 inches	*0.029*	*<0.12*	*0.029*	*0.018*	*<0.005*	0.069	0.091	**0.057**	*<0.005*
4/24/2006	ICES	TP-1A	3 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	0.0025	*<0.001*	**0.0058**	*<0.001*
4/24/2006	ICES	TP-2B	4 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
4/24/2006	ICES	TP-2A	3 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
4/24/2006	ICES	TP-3A	3 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
4/24/2006	ICES	TP-4A	3 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
4/24/2006	ICES	TP-5A	3 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
2/21/2008	SES	B1-2	2-2,5 feet	0.0039	0.02	*<0.00040*	*<0.00040*	*<0.00040*	0.011	0.0016	**0.062**	0.00065
2/21/2008	SES	B2-2	2-2.5 feet	0.0042	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
2/21/2008	SES	B3-2	2-2.5 feet	0.0047	*<0.025*	*<0.001*	*<0.001*	*<0.001*	0.0042	*<0.001*	**0.0082**	*<0.001*
2/21/2008	SES	B4-12	1-1.5 feet	*<0.002*	*<0.10*	*<0.002*	*<0.002*	*<0.002*	*<0.002*	*<0.002*	*<0.002*	*<0.002*
2/21/2008	SES	B4-24	2-2.5 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
2/21/2008	SES	B4-36	3-3.5 feet	*<0.002*	*<0.10*	*<0.002*	*<0.002*	*<0.002*	*<0.002*	*<0.002*	*<0.002*	*<0.002*
2/21/2008	SES	B5-2	2-2.5 feet	0.005	*<0.025*	*<0.001*	*<0.001*	*<0.001*	0.0094	0.0024	**0.055**	*<0.001*
2/21/2008	SES	B7-1	1-1.5 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	0.0013	0.0017	*<0.001*
2/21/2008	SES	B7-2	2-2.5 feet	*<0.001*	*<0.025*	0.0076	0.0052	*<0.001*	0.0031	*<0.001*	0.0013	*<0.001*
2/21/2008	SES	B7-3	3-3.5 feet	*<0.001*	*<0.025*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*	*<0.001*
Environmental Screening Limit [(a)]				NLP	0.44	NLP	NLP	2.3	1.6	1.6	0.0027/0.034	0.06
CHHSLs [(b)]				NLP	1.7	NLP	NLP	9.0	6.3	6.3	0.13	2.3

Notes:

DDD = dichlorodiphenyldichloroethane

DDE = dichlorodiphenyldichloroethene

DDT = dichlorediphenyltriclhloroethane

All concentrations reported in milligrams per kilogram (mg/kg)

(a) November 2007 Water Board Screening Levels for shallow soil for commercial/industrial sites where groundwater*is/is not* a drinking water resource

(b) January 2005 Cal/EPA California Human Health Screening Levels for soil for commercial/industrial land use

NLP = No level published

Concentrations in **bold** are above the drinking water standard

Table 2
Organochlorine Pesticide Concentrations in Groundwater
2519 Pulgas Avenue, East Palo Alto, CA

Sampling Date	Sample ID	Sample Depth (approximate)	Detected Concentrations								
			b-BHC	chlordane	a-chlordane	g-chlordane	DDD	DDE	DDT	dieldrin	endrin
Groundwater (µg/L)											
4/24/2006	TP-1W	7-9 feet	*<0.025*	**0.66**	*<0.25*	*<0.25*	<0.05	**0.94**	**0.37**	**6.4**	0.14
4/24/2006	TP-2W	7-9 feet	*<0.025*	**1.2**	*<0.25*	*<0.25*	<0.05	*<0.05*	**0.56**	**5.0**	0.11
4/24/2006	TP-3W	7-9 feet	*<0.25*	*<5.0*	*<2.5*	*<2.5*	<0.5	**2.0**	*<2.5*	**19**	*<0.5*
4/24/2006	TP-4W	7-9 feet	*<0.05*	**2.3**	*<0.5*	*<0.5*	<0.1	**4.0**	**2.4**	**24**	1.1
4/24/2006	TP-5W	7-9 feet	*<0.05*	**2.1**	*<0.5*	*<0.5*	<0.1	**1.5**	**0.78**	**10**	0.31
7/10/2007	SB-1W	7-11 feet	0.15	*<0.1*	*<0.05*	*<0.05*	*<0.01*	**0.16**	*<0.05*	**3.4**	*<0.01*
7/10/2007	SB-2W	7-11 feet	0.36	*<0.1*	*<0.05*	*<0.05*	*<0.01*	**0.022**	*<0.05*	**0.29**	*<0.01*
7/10/2007	SB-3W	9-13 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
7/10/2007	SB-4W	9-13 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
7/10/2007	SB-5W	9-13 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
2/21/2008	B1-GW	5-9 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	**0.061**	*<0.01*
2/21/2008	B2-GW	5-9 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
2/21/2008	B3-GW	5-9 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
2/21/2008	B4-GW	5-9 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
2/21/2008	B6-GW	5-9 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
2/21/2008	B7-GW	5-9 feet	*<0.005*	*<0.1*	*<0.05*	*<0.05*	*<0.01*	*<0.01*	*<0.05*	*<0.01*	*<0.01*
Environmental Screening Limit [(a)]			NLP	0.1/2,500	NLP	NLP	0.15/1,000	0.1/1,000	0.1/2,500	0.0022/2,500	2.0/1,000

Notes:
b-BHC = Beta-Hexachlorocyclohexane
DDD = dichlorodiphenyldichloroethane
DDE = dichlorodiphenyldichloroethene
DDT = dichlorediphenyltriclhloroethane
µg/L = micrograms per liter
(a) Water Board Screening Levels for groundwater for commercial/industrial sites where groundwater *is/is not* a drinking water resource
NLP = No level published The 2006 samples were unfiltered; the 2007 and 2008 samples were filtered.
Concentrations in **bold** are above the drinking water standard

4.0 REGULATORY CONSIDERATIONS & EVALUATION

COMPARISON OF SITE DATA TO PUBLISHED SCREENING CRITERIA AND TYPICAL BACKGROUND CONCENTRATIONS

The available data for native soils and shallow groundwater on the site were compared to relevant published regulatory agency screening criteria for consideration of potential exposures to intended site users (i.e., construction workers and commercial/industrial occupants). Detected organochlorine pesticides and metals concentrations were compared to published background concentrations to determine recommended soil remediation goals for the site. Potentially applicable published screening criteria considered in this Remediation Risk Management Plan (RRMP) include:

- *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Interim Final – February 2005, revised November 2007* (the "ESL Guidance") (Water Board, 2007)
- *Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties – January 2005* (Cal/EPA, 2005)

Background concentrations for arsenic concentrations in native soil were obtained from:

- *Natural Levels of Nickel, Selenium, and Arsenic in the Southern San Francisco Bay Area* (Anderson, 1998)

CHEMICALS OF CONCERN IN SOIL

Pesticides in Soil

SES compared the soil data for pesticides to relevant regulatory agency screening levels. The current Water Board ESL (Water Board, 2007) for dieldrin, the site COC in soil on commercial/industrial sites is 0.034 mg/kg for leaching or groundwater protection concerns (Final ESL, Table B-2) and 1.6 mg/kg for construction or trench worker direct exposure concerns (ESL Table K-2). All of the samples of site native soil collected at 6 to 9 inches and 15 to 18 inches, along with three samples from 2.0 to 2.5 feet and one sample from 3 feet, contained dieldrin above the regulatory groundwater protection ESL of 0.034 mg/kg. Chlordane was detected in one sample collected during the ICES Consulting Group February 2006 investigation

above regulatory ESLs, but the chlordane toxicity and persistence are overshadowed by that of dieldrin, the principal COC.

Total Petroleum Hydrocarbons as Gasoline and Diesel Fuel

Three former USTs were removed between 1986 and 1994. An additional boring investigation in 1994 focusing on potential residual petroleum hydrocarbon contamination in 1994 determined there is no residual contamination of regulatory concern. A historical account of site UST remedial activity is provided in Section 1.0.

Because of the lighter-than-water immiscible sheen/product encountered by the laboratory during extraction in two of the soil samples collected from boring B4 and in one sample collected from boring B1, construction activity in these areas should be monitored for potential hydrocarbon contamination.

Metals Soil Samples

A previous Limited Site Investigation (ICES, 2006a) entailed the collection of ten shallow soil samples for analysis of metals arsenic, lead, and mercury. Of the three metals, only arsenic was detected at concentrations above the regulatory ESL; however, the arsenic concentration was within background range. Thus, although it is not considered to be a site COC for future site occupants, arsenic should be considered (as discussed below) during the construction phase of development at the site. (See the ICES February 2006 Site Investigation in Appendix B for metals).

As discussed later in this report, site development includes the placement of an average of 2 feet or more of imported fill soils covering native soils across the site, and much of the site will be covered with buildings or paving. Soil management measures (discussed below) will be implemented for proper handling of soils excavated as part of site construction to reduce short-term and long-term potential exposures to site soils.

CHEMICALS OF CONCERN IN GROUNDWATER

As seen in Table 2, only one grab-groundwater sample collected during this 2008 investigation showed dieldrin at concentrations above regulatory ESLs. No other organochlorine pesticides were detected during the SES 2008 investigation.

The shallow groundwater in the RIA area, including the subject site, is generally known to be of poor quality with reference to drinking water potential as a result of high salinity due to proximity to the bay. The one location that exceeded ESLs should attenuate before migrating offsite. The shallow groundwater is not in use as a drinking water supply and is not expected to

be used as such in the foreseeable future. Also, as discussed in Section 8.0 a restriction will be placed on the site as part of development that will restrict the use of groundwater through the institutional control of a deed resection.

REGULATORY STANDARDS

The Water Board has established ESLs for evaluating the likelihood of environmental impact. ESLs are conservative screening-level criteria for soil and groundwater, designed to be generally protective of both drinking water resources and aquatic environments; they incorporate both environmental and human health risk considerations. ESLs are not cleanup criteria (i.e., health-based numerical values or disposal-based values). Rather, they are used as a preliminary guide in determining whether additional remediation and/or investigation may be warranted. Exceedance of ESLs suggests that additional investigation and/or remediation is warranted.

Different ESLs are published for commercial/industrial vs. residential land use, for sites where groundwater is a potential drinking water resource vs. is not a drinking water resource, and the type of receiving water body. A Water Board-published map shows areas where groundwater is, and is not, a potential drinking water resource.

In our professional opinion, the appropriate ESLs for the subject site are based on:

- Commercial/industrial (for the subject site itself) and all adjacent land use suggest the non-drinking water ESL be used.
- However, groundwater <u>is</u> a potential drinking water resource regionally. (Although the shallow groundwater is clearly not used for drinking water, the SCCDEH and the Santa Clara Valley Water District believe that the groundwater should be protected because municipal wells installed into deeper underlying aquifers at hundreds of feet bgs are recharged by the overlying groundwater).

The State of California has also promulgated the Maximum Contaminant Levels (MCLs) (drinking water standards) for any area where groundwater utilization is to occur or protection of sensitive aquifers is applicable. The shallow nature of the aquifer contamination in this area coupled with the deep and distant municipal wells suggest the application of commercial/industrial (non-drinking water) ESLs versus residential (drinking water ESLs). Drinking water standards may also be utilized by regulatory agencies to evaluate the potential risk associated with groundwater contamination. For the site contaminants, the non-drinking water standards associated with commercial/industrial land use are applied. In residential land use areas, the drinking water MCLs are applied; these are generally the same as the ESLs, except where there are no MCLs such as for gasoline or diesel.

Once ESLs are exceeded, the need for and type of additional investigative and corrective actions are generally driven by the potential risk associated with the contamination. Minimum regulatory criteria generally applied to subsurface contamination cases where groundwater is potentially at risk include:

- There was no identifiable contaminant source or the source has been removed, including reasonably accessible contaminated soils that pose a long-term impact to groundwater.

  In this case, the potentially "mixing area," which is considered the only potential source area, has been characterized by one soil sample set that found no significant soil contamination. Further testing of this area will occur during the site development to confirm no elevated pesticides.

- The extent of residual contamination has been fully characterized, to obtain sufficient lithologic and hydrogeologic understanding (generally referred to as a site Conceptual Model).

  The recent site filed work filled all remaining data gaps, allowing for a full evaluation of the extent of residual contaminated soil and residual impacts to groundwater quality.

- Groundwater wells have been installed and are monitored periodically to evaluate groundwater contaminant concentrations and hydrochemical trends.

  Grab-groundwater sampling showed no dissolved concentration of regulatory concern; thus, no groundwater wells are needed.

- The stability of the contaminant plume has been evaluated to determine whether it is moving or increasing in concentration.

  There is no offsite plume migration based on grab-groundwater sampling results.

- A determination has been made as to whether the residual contamination poses an unacceptable risk to sensitive receptors.

  There are no known sensitive receptors (see below).

SENSITIVE RECEPTORS

- The site lies within the Santa Clara Valley Basin, San Mateo Plain Sub-Basin of the San Francisco Bay Hydrologic Region. The nearest water body is an evaporator pond isolation channel, located about 1,600 feet northeast of the Pulgas Avenue site. The receiving body for groundwater discharge is an estuary (San Francisco Bay), located approximately 1,600 feet to the east of the site.

5.0 PROPOSED SITE DEVELOPMENT AND REMEDY

This section discusses the proposed remedial action in conjunction with the development plans for the site.

SITE DEVELOPMENT

Current plans include the construction of three two-story buildings, with multiple concrete tilt-up, slab-on-grade, 14-inch-thick concrete foundations with 18-inch-thick perimeter. The first building, Building C, will be constructed lengthwise from north to south on the western side of the site, and measure approximately 31,040 square feet. The other two buildings, Buildings A and B, will be constructed lengthwise from east to west and each measure approximately 28,800 square feet. The placement of the buildings will create a central courtyard area, which will be developed with landscaping and a fountain. The perimeter of the buildings will be developed with parking. The complex will be accessed through entrance/exits on Pulgas Avenue and Bay Road. The land use will be commercial or light-industrial. Based on discussions with the current site developer, Tarlton Properties, the intended future development of the site will be for biotechnology research and development. Figure 6 is a site plan showing the proposed building development footprints. Appendix E shows the planned layout of the buildings and their elevation views and details.

FACTORS IMPACTING THE FATE AND MOBILITY OF THE CONTAMINANTS OF CONCERN

Information in Sections 3.0 that summarized occurrences of COCs in soils and shallow groundwater at the site was used to evaluate potential pathways for migration of COCs and the possible resultant human and ecological receptor exposures to COCs found at the site. COCs identified in soil are low-mobility compounds, and do not appear to have significantly impacted groundwater quality beneath the site or to have migrated via groundwater movement offsite.

The primary COCs at the site are the organochlorine pesticide dieldrin and the metal arsenic, both low-mobility compounds. The past detected petroleum hydrocarbon residuals are likely weathered products, considering the relatively low concentrations and the fact that no free phase product has ever been identified. Thus, it is expected that the identified COCs at the site will exhibit low mobility.

N

SITE MAP SHOWING 3 PROPOSED TWO-STORY BUILDINGS DEVELOPMENT FOOTPRINT

2519 Pulgas Ave. East Palo Alto, CA	By: MJC	FEBRUARY 2008
	Figure 6	

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2007-73-08

The primary pathways for human exposure to the COCs in soil and groundwater are through direct contact (dermal exposure or inhalation).

REMEDIAL ACTION OBJECTIVE

The remedial action objectives (RAO) for the site are:

- Mitigate or reduce residual soil contamination from being mobilized to groundwater by removal of the infiltration and mobilization pathway; and
- Mitigate or reduce residual soil and groundwater contamination from direct human exposure to soil and groundwater containing COCs.

Based on review of the available site characterization data, regulatory guidance materials, and planned land uses as summarized above, the RAOs for soil and groundwater at site containing COCs are generally as follows.

Remedial Action Objectives for Soil

Remedial actions and appropriate future risk management measures should be implemented so that any residual concentrations of COCs remaining in soil at the site do not result in unacceptable human health risks to future site occupants from potentially carcinogenic or non-carcinogenic health effects of the COCs under intended land uses.

Remedial Action Objectives for Groundwater

Specific RAOs for groundwater at the site are to protect it from future impacts due to the residual concentrations in soil. The current groundwater quality does not require active remediation, with only one of the nine samples showing a detectable compound above the ESL. This slight impact is not a significant threat to water quality and can be easily manager with the deed restriction proposed.

Shallow groundwater in the Ravenswood Industrial Area is naturally high in salinity due to the proximity of San Francisco Bay. This water is not currently being used as a drinking water supply, and is not likely to be used in the future. Municipal drinking water is provided to the Ravenswood Industrial Area, and there is no need to use underlying groundwater for drinking water. This being the case, cleanup objectives are not required to be met in the immediate future. No significant sources of groundwater pollution are known to exist on the site, and it is anticipated that natural processes will result in attenuation of pollutants in groundwater, eventually restoring water quality at this site.

PESTICIDE REMEDIAL ACTION AND RISK MANAGEMENT PLAN

Given the low level of human health risk presented by the residual concentrations of COCs found at the site, the recommended remedial action for the site is encapsulation. This includes both the area to be covered by the building footprint, as well the parking and landscaped areas.

1) Encapsulation (Cover and Containment)

As part of site redevelopment, after the initial vegetative grubbing and rough grading for leveling, the entire site will be covered with a geomembrane to demarcate the area of residual pesticides. An average of 2 feet of compacted class II base rock will be placed above the geomembrane to create a new ground surface. Figure 5 demonstrates the placement of the membrane and base rock over native soils.

Over 90 percent of the site will be additionally covered by the proposed building footprints or asphalt parking. The remaining area will consist of landscaping/hardscaping in planters and bermed areas. In these unpaved areas, a minimum of 2 feet of fill soil will be imported and its thickness confirmed by field measurement. Any soil generated during earthwork operations (as proposed for the 20-foot-wide by 4-foot-deep by 50-foot-long utility trench entering the site from the Bay Road parcel) will remain on-site and be distributed beneath the building footprint.

Infiltration of surface water (which can leach contaminants into groundwater) is not a significant concern at the site, as most COCs identified at the site sorb tightly to soil and are not generally considered to be mobile in the environment (e.g., high molecular weight organochlorine pesticides and metals). Volatile organic compounds and volatile fractions of petroleum fuels (e.g., low molecular-weight petroleum hydrocarbons [compounds of benzene, toluene, ethylbenzene, and xylenes]) that can leach from soil are generally not found in site soils.

The proposed development is thus well suited for the encapsulation remedy, eliminating exposure pathways to impacted soil to future site occupants. Institutional controls (discussed below) and ongoing maintenance activities will be included as part of a containment remedy to ensure its long-term protectiveness.

2) Source Area Soil Removal and Offsite Disposal

While soils affected by pesticides may remain onsite and potential exposure controlled through encapsulation, any “source” areas encountered during grubbing and rough grading must be excavated and disposed of offsite. The former “pesticide mixing area,” will be further investigated by soil sampling during the initial grading operations. If any of the COCs are found

above regulatory levels of concern, the contaminated soil will be excavated and disposed of offsite at an appropriate facility based on the analytical results.

3) Institutional Controls

The Institutional controls presented below are designed to limit exposure to the residual pesticides in soil to be left in place, or to ensure the effectiveness of the chosen remedy. The institutional controls planned for this site are:

- Implementation of a Construction Risk Management Plan by current and future owners, tenants, and operators. This will include the implementation of the encapsulation remedy and engineering design;
- Implement a Post Construction Risk Management Plan which will include an agreement by the site owners for operations and maintenance of the site encapsulation; and
- Application of an environmental covenant and deed restriction as institutional controls for the selected remedy, requiring the site owner to enter into a land use covenant (i.e., Deed Restriction). The land use covenant shall clearly specify the restrictions and prohibitions identified. The land use covenant shall be recorded with the San Mateo County Assessor's Office. The land use covenant will be binding to all site owners and occupants, and will remain in effect until it is formally removed or modified pursuant to the procedures contained in the land use covenant to be established with consent of the Water Board.

Short-term and long-term risk management protocols will be implemented, including the use of protective clothing and other health and safety measures for construction workers involved in earthwork operations into the native soil with the residual pesticides. These are described in detail in Section 7.0 below.

4) Engineering Design

The subject site will be designed to reduce the future need to handle or come in contact with any potential residual pesticides in the soil or groundwater as follows:

- The site will be covered with geotextile over the native soil with two feet of imported base rock overlying it;
- The major utilities supporting the site development will be concentrated in one corridor coming in from Bay Road. The estimated 4-foot deep excavation will be completed so the utility corridor is clean and no exposure to workers involved in any future repairs will be an issue;

- Minor utilities between the buildings will be buried within the 2 feet of clean imported fill, above the geotextile separating the native soil from the overlaying fill; and
- All landscaped area will be filled with clean imported soil.

6.0 CONSTRUCTION RISK MANAGEMENT

These construction-phase risk management protocols address precautions that will be taken for mitigation of risks to human health and the environment during earthwork construction for planned redevelopment and remedy of the site as described in Section 6. The precautions described in detail below are:

WORKER PROTECTION

Each earthwork construction contractor with workers who may directly contact native site soils or groundwater (e.g., during site preparation and grading will prepare its own site-specific health and safety plan (HASP), as deemed necessary by its corporate policies and consistent with State and Federal Occupational Safety and Health Administration standards for hazardous waste operations (California Code of Regulations, Title 8, Section 5192 and 29 Code of Federal Regulations 1910.120, respectively) and any other applicable health and safety standards. Among other things, the HASP will include a description of health and safety training requirements for onsite personnel, a description of the level of personal protective equipment to be used and any other applicable precautions to be undertaken to minimize direct contact with soil and groundwater.

CONSTRUCTION IMPACT MITIGATION MEASURES

The measures below will be implemented by the selected remediation work contractor and future earthwork contractors to mitigate potential impacts to human health and the environment during construction at the site. Measures will be implemented to mitigate the following impacts:

- Dust generation associated with excavation and/or loading activities, construction or transportation equipment traveling over soil, and wind traversing COC-containing soil stockpiles;
- Tracking soil off the site with construction or transportation equipment;
- Transporting sediments from the site in surface water run-off; and
- Managing groundwater extracted while performing below-grade construction activities.

The mitigation measures for these potential impacts will include, but are not limited to, the following:

- Implementing dust control measures;
- Decontaminating construction and transportation equipment;
- Implementing stormwater pollution controls; and
- Treating any extracted groundwater prior to disposal to the storm drain, to the sanitary sewer, or at an appropriate offsite facility.

These mitigation measures are discussed in more detail below.

Dust Control

Dust control measures will be implemented during construction activities at the site to minimize the generation of dust. It is particularly important to minimize exposure of onsite construction workers or commercial workers, if present on other areas of the site, to dust containing COCs and to prevent nuisance dust and dust containing COCs from migrating offsite. Dust generation activities that will be mitigated include those associated with excavation activities, creation of soil stockpiles, truck traffic on unpaved areas of the site, ambient wind traversing soil stockpiles, and loading of soil into transportation vehicles.

Dust generation will be minimized by any or all appropriate measures. These measures may include the following:

- Mist or spray water while performing excavation activities and loading transportation vehicles;
- Limit vehicle speeds on the site to 5 miles per hour;
- Control excavation activities to minimize the generation of dust;
- Minimize drop heights while loading transportation vehicles; and
- Cover with plastic sheeting or tarps any soil stockpiles generated as a result of excavating soil potentially impacted by COCs.

Additional dust control measures may be implemented, as necessary, especially if windy conditions persist.

Decontamination

Construction equipment and transportation vehicles that contact exposed native site soils will be decontaminated prior to leaving the site during the initial grading only and before the geomembrane is placed on the site to separate the native material from the imported base rock. This will minimize the possibility that earth moving equipment will track COC-containing soil onto public roadways.

Decontamination methods will include scraping, brushing, and/or vacuuming to remove dirt on vehicle exteriors and wheels. In the event that these dry decontamination methods are not adequate, methods such as steam cleaning, high-pressure washing, and cleaning solutions will be used, as necessary, to thoroughly remove accumulated dirt and other materials. Wash water resulting from decontamination activities will be collected and managed in accordance with all applicable laws and regulations.

Stormwater Pollution Controls

Should rainfall occur during construction on exposed soils at the site, stormwater pollution controls will be implemented to minimize stormwater runoff from exposed COC-containing soil at the site and to prevent sediment from leaving the site, in accordance with all laws and regulations.

Stormwater pollution controls will be based on best management practices, such as those described in the *California Storm Water Best Management Practice Handbooks Construction Activity* (Storm Water Quality Task Force, 1993). Onsite sediment and erosion protection controls will be the primary methods for minimizing discharges of sediments from the site. Sediment and erosion protection controls may include, but are not limited to, the following:

- Constructing berms or erecting silt fences at entrances to the site;
- Placing straw bale barriers around catch basins and other entrances to the storm drain; and
- During significant rainfall events, covering with plastic sheeting or tarps any soil stockpiles generated as a result of excavating soil potentially impacted by COCs.

Dewatering

No dewatering is anticipated during the project.

SOIL MANAGEMENT PROCEDURES

These soil management procedures described below provide the protocols to determine when soil excavated during redevelopment or future construction activities can be used as backfill on the site or managed for offsite disposal at appropriately permitted facilities.

Soil Handling and Re-Use beneath Foundations

During earthwork operations, any soil excavated as part of the utility trench area and removed from the ground will be reserved for reuse beneath the building foundations. During the temporary storage stage the soil will be temporarily placed on plastic sheeting and covered. The

soil beneath the 1885 Bay Road parcel where the principal utility corridor is to be trenched is considered to be clean and will be segregated from soil on the former Nursery parcel.

Soil Sampling in Mixing Area and Other Areas Indicated to be Potentially Contaminated

In the area known as the former mixing area, the soil during initial grading will be examined for any indicators of contamination. The one soil sample collected during the investigation of this area showed no contaminant concentrations of concern, but if any indication of contamination is noted during grading, more soil sampling will be performed and the samples submitted for analyses for the COCs described.

Soil Sampling Frequency

If soil testing is deemed necessary based on field observations, the soil sampling frequency (i.e., the quantity of samples per volume of soil) will be one representative sample per approximately 50 cubic yards of soil.

Abandoned Subsurface Structures

Any encountered, abandoned subsurface structures that may contain liquids, e.g., sumps, storage tanks, and pipelines, will be treated as possible COC-contaminated materials or potential sources of petroleum hydrocarbons to soil and groundwater, particularly if they were not emptied prior to abandonment. The following procedures will be followed if sumps, underground tanks, or pipes are encountered:

- Any obvious leakage or drainage will be collected, contained and stopped as rapidly as can be safely accomplished by the contractor;
- Water Board staff will be notified and applicable paperwork, such as an Underground Tank Closure Plan with San Mateo County, will be initiated;
- Residual liquids in the sump(s), tank(s), and/or pipe(s) will be removed, contained, tested as required for disposal, and appropriately disposed;
- Sumps and tanks will be cleaned and closed in place or excavated and appropriately disposed;
- If it is not necessary to remove all of a discovered pipe to complete construction, then the pipe will be cut, the portion of the pipe required to be removed to complete construction will be removed and appropriately disposed, and the ends of the pipe remaining in place will be capped; and

- Visibly contaminated or odorous soil, whether or not it is associated with encountered subsurface sumps, tanks, or pipes, will be subject to the soil management procedures discussed above.

If residual liquids are determined to contain COCs or hazardous compounds other than petroleum hydrocarbon constituents at significant concentrations or quantities, the Water Board will be contacted, and additional environmental assessments will be conducted in accordance with the Water Board's guidance and in accordance with all laws and regulations.

7.0 POST-CONSTRUCTION RISK MANAGEMENT

The post-construction risk-management protocols discussed here address precautions that will be undertaken for mitigation of future potential risks to human health and the environment after remedial actions, construction, and redevelopment of the site are complete. Potential future onsite receptors include industrial/commercial workers, subsurface construction workers, and maintenance workers. However, it should be noted that, although this discussion is designed to convey the general content, the Post Closure RMP will be developed after the construction is complete so as to incorporate all as-builts, which can sometimes differ form original plans. At a minimum the post construction RMP will present documentation for the following site conditions:

- The area of the clean major utility corridor
- The mapped out areas of the minor utility corridors in the clean base rock; and
- The clean landscaping areas.

Based on nature of the COCs and planned land use, the implementation of the encapsulation remedy will remove the exposure pathway for typical onsite tenants, occupants, or casual maintenance workers. Exposure pathways (e.g., ingestion, dermal contact) are considered incomplete for typical onsite tenants or occupants, for the following reasons:

- When redevelopment is complete, soil with residual concentrations of COCs will be effectively capped with a 2-foot-thick layer of imported class II base rock and foundation and/or asphalt above that.
- The site will be mostly covered by paving or structures, preventing contact with this soil by typical onsite commercial/ industrial tenants or occupants.

Any future subsurface construction or maintenance activities that may encounter potentially COC-impacted soil must be completed in a manner that is consistent with the risk management procedures described below. Components of the post-construction risk management protocols are as follows:

- Minimize or prevent exposure of site occupants or site visitors to exposed soil during construction work;

- Establish protocols for onsite workers engaged in subsurface excavation activities (e.g., utility repairs, work on building foundations, changes to paved areas) to define adequate protective measures;
- Preclude use of groundwater beneath the site (via a deed restriction); and
- Establish notification procedures to ensure long-term compliance with this risk management plan.

ENVIONMENTAL COVENANT AND DEED RESTRICTIONS

An environmental covenant and deed restriction for the site will be recorded in the San Mateo County Recorder's office. The current site owner and any future owners of the site or any portion of the site will be subject to the deed restrictions. The deed restrictions will require the site owner to comply with the protocols of this RRMP, which will include:

- Prohibit use of local groundwater;
- Maintain commercial/industrial land use (no residential or other sensitive uses); and
- Require Implementation of Post Closure Risk Management Plan/Soil Management Plan.

8.0 REFERENCES

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9.0 LIMITATIONS

This report has been prepared for the exclusive use of Tarlton Properties, the regulatory agencies, and their authorized representatives and/or assigns. No reliance on this report shall be made by anyone other than those for whom it was prepared.

The findings and conclusions presented in this report are based solely on the findings of the investigations discussed herein. This report provides neither a certification nor guarantee that the site is free of hazardous substance contamination. This report has been prepared in accordance with generally accepted methodologies and standards of practice. The SES personnel who performed this investigation are qualified to perform such investigations and have accurately reported the information available, but cannot attest to the validity of that information. No warranty, expressed or implied, is made as to the findings, conclusions, and recommendations included in the report.

The findings of this report are valid as of the present. Site conditions may change with the passage of time, natural processes, or human intervention, which can invalidate the findings and conclusions presented in this report. As such, this report should be considered a reflection of the current site conditions as based on the investigation and remediation completed.

APPENDIX A

Photodocumentation

Subject: Suspected support columns of former “pesticide mixing area.”	
Site: 2519 Pulgas Avenue, East Palo Alto , CA	
Date Taken: February 21, 2007	Project No.: SES 2007-73
Photographer: Henry Pietropaoli	Photo No.: 01

Subject: Groundwater sampling at boring location 1 (B-1).	
Site: 2519 Pulgas Avenue, East Palo Alto , CA	
Date Taken: February 21, 2007	Project No.: SES 2007-73
Photographer: Henry Pietropaoli	Photo No.: 02

Subject: Drilling at boring location 4 (B-4).	
Site: 2519 Pulgas Avenue, East Palo Alto , CA	
Date Taken: February 21, 2007	Project No.: SES 2007-73
Photographer: Henry Pietropaoli	Photo No.: 03

Subject: Soil Core and boring location 5 (B-5).	
Site: 2519 Pulgas Avenue, East Palo Alto , CA	
Date Taken: February 21, 2007	Project No.: SES 2007-73
Photographer: Henry Pietropaoli	Photo No.: 04

APPENDIX B

Historical Analytical Results and Figures

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH
NOV 25 1992
RECEIVED

TANK REMOVAL ACTIVITY REPORT

JOB LOCATION:

IWASAKI PROPERTY
2519 PULGAS AVENUE
EAST PALO ALTO, CALIFORNIA

PREPARED BY:

SEMCO
1741 LESLIE STREET
SAN MATEO, CA 94402
(415) 572-8033

APPENDIX

1) ANALYTICAL RESULTS
   - CHAIN OF CUSTODY
   - SAMPLING LOCATION MAP

2) PERMITS

3) MANIFESTS

4) INSPECTORS SITE LOG (IF APPLICABLE)

5) DAILY SAFTEY BREIFING REPORT
   - SIGNATURE PAGE FROM SITE SAFETY PLAN

Environmental Protection Agency
OMB No. 2050-0039 (Expires 9-30-94)
type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of Page 6.

Department of Toxic Substances Con
Sacramento, California

92182696

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAC000819752
Manifest Document No.: 92696
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Sat Iwasaki 2519 Pulgas Ave East Palo Alto CA 94303
4. Generator's Phone: (415) 323-3787

A. State Manifest Document Number: 92182696
B. State Generator's ID: CAC000819752
C. State Transporter's ID: 322-73
D. Transporter's Phone: (209) 576-8500
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID: CAD083166728
H. Facility's Phone: (800) 874-4444

5. Transporter 1 Company Name: Allied Petroleum
6. US EPA ID Number: CAD980675128
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: Refineries Service 13331 N HWY 33 Patterson CA 95363
10. US EPA ID Number: CAD083166728

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. NON RCRA HAZARDOUS WASTE LIQUID NOS NA 9189	1	TT	735	G	State EPA/Other
b.					State EPA/Other
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
95% Water & Rinsate
5% Fuel

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
Use Appropraite Protective Gear
Designated Facility Emergency Contact # (800)374-4444
Generator Emergency Contact #(415) 323-3787

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] Signature: [illegible] Month 11 Day 05 Year 9

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Colin Kelley Signature: Colin Kelley Month 11 Day 05 Year 9

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Signature: Month Day Year

FACILITY

19. Discrepancy Indication Space
[illegible] Ticket 839

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] Signature: [illegible] Month 11 Day 11 Year 9

DO NOT WRITE BELOW THIS LINE.

DTSC 8022A (12/91)
EPA 8700—22

Green: HAULER RETAINS

American Environmental Network

Certificate of Analysis

DOHS Certification: 1172 AIHA Accreditation: 11134

ICES
P.O. BOX 11582
BERKELEY, CA 94701

ATTN: PENG LEONG

CLIENT PROJ. ID: ICES 2025

REPORT DATE: 02/16/94

DATE SAMPLED: 02/01/94

DATE RECEIVED: 02/02/94

AEN JOB NO: 9402021

PROJECT SUMMARY:

On February 2, 1994, this laboratory received four (4) soil samples and one (1) water sample.

Client requested two (2) soil samples be composited into one (1) sample. The composite sample, two (2) discrete soil samples and the water sample were analyzed for organic parameters. Sample identifications, methodologies, results and dates analyzed are summarized on the following pages.

All laboratory quality control parameters were found to be within established limits. Batch QC data is included at the end of this report.

If you have any questions, please contact Client Services at (510) 930-9090.

Larry Klein
General Manager

3440 Vincent Road • Pleasant Hill, CA 94523 • (510) 930-9090 • FAX (510) 930-0256

Iwasaki

ICES

SAMPLE ID: EX-1
AEN LAB NO: 9402021-01
AEN WORK ORDER: 9402021
CLIENT PROJ. ID: ICES 2025

DATE SAMPLED: 02/01/94
DATE RECEIVED: 02/02/94
REPORT DATE: 02/16/94

ANALYTE	METHOD/ CAS#	RESULT	REPORTING LIMIT	UNITS	DATE ANALYZED
EPA 8020 for BTEX	EPA 8020				
Benzene	71-43-2	ND	5	ug/kg	02/03/94
Toluene	108-88-3	ND	5	ug/kg	02/03/94
Ethylbenzene	100-41-4	ND	5	ug/kg	02/03/94
Xylenes, Total	1330-20-7	ND	5	ug/kg	02/03/94
#Extraction for Diesel/Oil	EPA 3550	-		Extrn Date	02/02/94
TPH as Diesel	GC-FID	4 *	1	mg/kg	02/05/94

ND = Not detected
* = Indicates value above reporting limit

ICES

SAMPLE ID: EX-2
AEN LAB NO: 9402021-02
AEN WORK ORDER: 9402021
CLIENT PROJ. ID: ICES 2025

DATE SAMPLED: 02/01/94
DATE RECEIVED: 02/02/94
REPORT DATE: 02/16/94

ANALYTE	METHOD/ CAS#	RESULT	REPORTING LIMIT	UNITS	DATE ANALYZED
EPA 8020 for BTEX	EPA 8020				
Benzene	71-43-2	ND	5	ug/kg	02/04/94
Toluene	108-88-3	ND	5	ug/kg	02/04/94
Ethylbenzene	100-41-4	ND	5	ug/kg	02/04/94
Xylenes, Total	1330-20-7	ND	5	ug/kg	02/04/94
#Extraction for Diesel/Oil	EPA 3550	-		Extrn Date	02/02/94
TPH as Diesel	GC-FID	11 *	1	mg/kg	02/05/94

ND = Not detected
* = Indicates value above reporting limit

ICES

SAMPLE ID: P-1, P-2
AEN LAB NO: 9402021-03
AEN WORK ORDER: 9402021
CLIENT PROJ. ID: ICES 2025

DATE SAMPLED: 02/01/94
DATE RECEIVED: 02/02/94
REPORT DATE: 02/16/94

ANALYTE	METHOD/ CAS#	RESULT	REPORTING LIMIT	UNITS	DATE ANALYZED
EPA 8020 for BTEX	EPA 8020				
Benzene	71-43-2	ND	5	ug/kg	02/04/94
Toluene	108-88-3	43 *	5	ug/kg	02/04/94
Ethylbenzene	100-41-4	ND	5	ug/kg	02/04/94
Xylenes, Total	1330-20-7	ND	5	ug/kg	02/04/94
#Extraction for Diesel/Oil	EPA 3550	-		Extrn Date	02/02/94
TPH as Diesel	GC-FID	32 *	1	mg/kg	02/08/94

ND = Not detected
* = Indicates value above reporting limit

ICES

SAMPLE ID: EX-W
AEN LAB NO: 9402021-04
AEN WORK ORDER: 9402021
CLIENT PROJ. ID: ICES 2025

DATE SAMPLED: 02/01/94
DATE RECEIVED: 02/02/94
REPORT DATE: 02/16/94

ANALYTE	METHOD/ CAS#	RESULT	REPORTING LIMIT	UNITS	DATE ANALYZED
EPA 8020 for BTEX	EPA 8020				
Benzene	71-43-2	ND	0.5	ug/L	02/07/94
Toluene	108-88-3	ND	0.5	ug/L	02/07/94
Ethylbenzene	100-41-4	ND	0.5	ug/L	02/07/94
Xylenes, total	1330-20-7	ND	4	ug/L	02/07/94
#Extraction for Diesel/Oil	EPA 3510	-		Extrn Date	02/02/94
TPH as Diesel	GC-FID	13 *	0.05	mg/L	02/05/94

ND = Not detected
* = Indicates value above reporting limit

QUALITY CONTROL DATA

DATE EXTRACTED: 02/01/94
DATE ANALYZED: 02/02/94
CLIENT PROJ. ID: ICES 2025

AEN JOB NO: 9402021
SAMPLE SPIKED: 9401309-06
INSTRUMENT: C

MATRIX SPIKE RECOVERY SUMMARY
TPH EXTRACTABLE SOIL
METHOD: EPA 3550 GCFID

ANALYTE	Spike Added (mg/kg)	Average Percent Recovery	RPD
Diesel	41.9	63	8

CURRENT QC LIMITS

Analyte	Percent Recovery	RPD
Diesel	(44-105)	18

RPD = Relative Percent Difference

Daily method blanks for all associated analytical runs showed no contamination over the reporting limit.

QUALITY CONTROL DATA

DATE EXTRACTED: 02/02/94
DATE ANALYZED: 02/04/94
CLIENT PROJ. ID: ICES 2025

AEN JOB NO: 9402021
SAMPLE SPIKED: D.I. WATER
INSTRUMENT: C

METHOD SPIKE RECOVERY SUMMARY
TPH EXTRACTABLE WATER
METHOD: EPA 3510 GCFID

ANALYTE	Spike Added (mg/L)	Average Percent Recovery	RPD
Diesel	2.11	81	5

CURRENT QC LIMITS

Analyte	Percent Recovery	RPD
Diesel	(55-119)	8

RPD = Relative Percent Difference

Daily method blanks for all associated analytical runs showed no contamination over the reporting limit.

QUALITY CONTROL DATA

CLIENT PROJ. ID: ICES 2025

AEN JOB NO: 9402021

INSTRUMENT: H

SURROGATE STANDARD RECOVERY SUMMARY
METHOD: EPA 8020
(SOIL MATRIX)

Date Analyzed	SAMPLE IDENTIFICATION Client Id.	Lab Id.	SURROGATE RECOVERY (PERCENT) Fluorobenzene
02/03/94	EX-1	01	103
02/04/94	EX-2	02	99
02/04/94	P-1,P-2	03	99

CURRENT QC LIMITS

ANALYTE	PERCENT RECOVERY
Fluorobenzene	(70-115)

ACCUTITE

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JUN 11 1993

RECEIVED

Company Name IWASAKI NURSERY

Contact

Address 2519 Pulgas Avenue

City, State, Zip East Palo Alto, CA 94303

Telephone (415) 323-3787

Contractor ACCUTITE TANK TESTING

Address 35 SO. LINDEN AVE.

City, State, Zip SO. SAN FRANCISCO, CA 94080

Tank Farm Location SAME

Contact

Address

City, State, Zip

Telephone

Operator Mark Lyon Lic. #94-1469

Date August 25, 1992

Telephone (415) 952-5551

TANK NO.	CAPACITY	DIAMETER	PRODUCT	HIGH TEST RESULTS	LOW TEST RESULTS	CERTIFIED TIGHT
1	10,000	92"S	DIESEL	+.0048GPH	N/A	YES

Line Test Results:
Full System Tight

Remarks Arrived on site at 8:00 a.m. Tank was filled 48 hours prior to test. No drop tube in the tank, no Groundwater well on site. Tank tested as if 25% under water. Set up Horner I testing equipment. Closed supply & return lines, filled system with 30 gallons of diesel. Bled aid and restored level. Let tank stablize for 1 hour. Performed .4 pound pressure drop and let stabilize for 3 hours. Calibrated and began test. No overfill bucket. This full system tested under the legal limit allowed by the NFPA criteria #329 of +/- .0500GPH. NO PARTS OR PRODUCTS USED

ACCUTITE

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JUN 11 1993

RECEIVED

Company Name: IWASAKI NURSERY

Contact:

Address: 2519 Pulgas Avenue

City, State, Zip: East Palo Alto, CA 94303

Telephone: (415) 323-3787

Contractor: ACCUTITE TANK TESTING

Address: 35 SO. LINDEN AVE.

City, State, Zip: SO. SAN FRANCISCO, CA 94080

Tank Farm Location: SAME

Contact:

Address:

City, State, Zip:

Telephone:

Operator: Mark Lyon Lic. #94-1469

Date: August 25, 1992

Telephone: (415) 952-5551

TANK NO.	CAPACITY	DIAMETER	PRODUCT	HIGH TEST RESULTS	LOW TEST RESULTS	CERTIFIED TIGHT
1	10,000	92"S	DIESEL	+.0048GPH	N/A	YES

Line Test Results:
Full System Tight

Remarks: Arrived on site at 8:00 a.m. Tank was filled 48 hours prior to test. No drop tube in the tank, no Groundwater well on site. Tank tested as if 25% under water. Set up Horner I testing equipment. Closed supply & return lines, filled system with 30 gallons of diesel. Bled aid and restored level. Let tank stablize for 1 hour. Performed .4 pound pressure drop and let stabilize for 3 hours. Calibrated and began test. No overfill bucket. This full system tested under the legal limit allowed by the NFPA criteria #329 of +/- .0500GPH. **NO PARTS OR PRODUCTS USED**

ACCUTITE

Tank 1

EZY-CHEK WORK SHEET

8-25-92

20-50 = 30
50-83 = 33
44-75 = 31

Tank # 1 Test Level Full Product Diesel Capacity 10,000 Chart cal. 200ml 31.333 .0017 (A)

Measured gravity _____ Product temp. _____ Coeffiecient .000443 Temp. cal. .000443 10,000 4.43 (B)

est	level start	level end	gain + loss −	x (A) x (A)	level result	temp. start	temp. end	gain + loss −	x (B) x (B)	temp. result	final result	time
1	83	78	−5	.0017	−.0085	.299	.299	+.000	4.43	+.000	−.0085	1300
2	78	72	−6	.0017	−.0102	.299	.299	+.000	4.43	+.000	−.0102	1325
3	72	65	−7	.0017	−.0119	.299	.300	+.001	4.43	+.0044	−.0103	1310
4	65	58	−7	.0017	−.0119	.300	.296	−.004	4.43	−.0177	+.0058	1315
5	58	51	−7	.0017	−.0119	.296	.290	−.006	4.43	−.0266	+.0147	1320
6	51	45	−6	.0017	−.0102	.290	.285	−.005	4.43	−.0222	+.0120	1325
7	45	36	−9	.0017	−.0153	.285	.282	−.003	4.43	−.0133	−.0020	1330
8	36	29	−7	.0017	−.0119	.282	.278	−.004	4.43	−.0177	+.0058	1335

Average N/A

Station Location Iwasaki Nursery

Address 2519 Polgas Ave.

City, State East Palo Alto CA

Certified tight N/A

Leak rate per hour cont. next page

Operator Mark Lyon

Pg. 1

04-042 (Rev. 7/92)

ACCUTITE

Temp. 1

EZY-CHEK WORK SHEET

8-25-92

Tank # 1 Test Level Full Product Diesel Capacity 10,000 Chart cal. 200ml 31.333 .0017 (A)

Measured gravity _____ Product temp. _____ Coeffiecient .000443 Temp. cal. .000443 10,000 4.43 (B)

est	level start	level end	gain + loss −	x (A) x (A)	level result	temp. start	temp. end	gain + loss −	x (B) x (B)	temp. result	final result	time
9	~~28~~ 88	83	−5	.0017	−.0085	.278	.275	+.000	4.43	+.0000	−.0085	1345
10	83	75	−8	.0017	−.0136	.278	.270	−.008	4.43	−.0354	−.0318	1345
11	75	68	−7	.0017	−.0119	.270	.254	−.016	4.43	−.0709	−.0590	1350
12	68	61	−7	.0017	−.0119	.254	.252	+.008	4.43	+.0354	−.0473	1355
13	61	55	−6	.0017	−.0102	.252	.264	+.002	4.43	+.0089	−.0191	1400
14	55	48	−7	.0017	−.0119	.264	.267	+.003	4.43	+.0133	.0252	1405
15	48	41	−7	.0017	−.0119	.267	.265	−.002	4.43	−.0089	.0030	1410
16	41	34	−6	.0017	−.0102	.265	.261	−.004	4.43	−.0177	−.0075	1415

Average N/A

Station Location Iwasaki Nursery

Address 2519 Pulgas Ave

City, State East Palo Alto, CA

Certified tight N/A

Leak rate per hour cont. next page

Operator Mark Iyo

pg 2

04-042 (Rev. 7/92)

ACCUTITE

Temp. 1

EZY-CHEK WORK SHEET

3-25-92

Tank # 1 Test Level Full Product Diesel Capacity 10,000 Chart cal. 200ml 31.333 .0017 (A)

Measured gravity _____ Product temp. _____ Coeffiecient .000443 Temp. cal. .000443 10,000 4.43 (B)

est	level start	level end	gain + loss −	x (A) x (A)	level result	temp. start	temp. end	gain + loss −	x (B) x (B)	temp. result	final result	time
1B33	78	73	-5	.0017	-.0085	.216 ~~.218~~ MG2	.215	-.001	4.43	-.0044	-.0041	1540
34	73	68	-5	.0017	-.0085	.215	.213	-.002	4.43	-.0089	+.0004	1545
				.0017					4.43			

Average +.0048

Station Location Iwasaki Nursery

Address 2519 Pulgas Ave

City, State East Palo Alto, CA

Certified tight yes

Leak rate per hour +.0048 GPH

Operator Mal O.

pg 5

04-042 (Rev. 7/92)

ACCUTITE

Temp. 1

EZY-CHEK WORK SHEET

8-25-92

Tank # 1 Test Level Full Product Diesel Capacity 10,000 Chart cal. 200 m 1 31.333 .0017 (A)

Measured gravity _____ Product temp. _____ Coeffiecient .000443 Temp. cal. .000443 10,000 4.43 (B)

est	level start	level end	gain + loss −	x (A) x (A)	level result	temp. start	temp. end	gain + loss −	x (B) x (B)	temp. result	final result	time
17	34	27	−7	.0017	−.0119	.261	.253	−.008	× 4.43	−.0354	−.0235	1420
18	27	20	−7	.0017	−.0119	.253	.254	+.001	× 4.43	+.0044	−.0163	1425
19	20	13	−7	.0017	−.0119	.254	.252	−.002	× 4.43	−.0089	+.0030	1430
RB 20	90	84	−6	.0017	−.0102	.252	.248	−.004	× 4.43	−.0177	+.0075	1435
21	84	78	−6	.0017	−.0102	.248	.244	−.004	× 4.43	−.0177	+.0075	1440
22	78	73	−5	.0017	−.0085	.244	.240	−.004	× 4.43	−.0177	+.0092	1445
23	73	66	−7	.0017	−.0119	.240	.238	−.002	× 4.43	−.0089	−.0030	1450
24	66	60	−6	.0017	−.0102	.238	.237	−.001	× 4.43	−.0044	−.0058	1455

Average N/A

Station Location Iwasaki Nursery

Address 2519 Pulgas Ave

City, State East Palo Alto, CA

Certified tight N/A

Leak rate per hour continued next page p43

Operator Mark Lyon

04-042 (Rev. 7/92)

ACCUTITE

Tank 2
Temp. 1

EZY-CHEK WORK SHEET

8-25-92

Tank # 1 Test Level Full Product Diesel Capacity 10,000 Chart cal. 200ml 31.333 .0017 (A)

Measured gravity _____ Product temp. _____ Coeffiecient .00443 Temp. cal. .00443 10,000 4.43 (B)

est	level start	level end	gain + loss −	x (A) x (A)	level result	temp. start	temp. end	gain + loss −	x (B) x (B)	temp. result	final result	time
25	60	53	−7	.0017	−.0119	.237	.234	−.003	4.43	−.0133	+.0014	1500
26	53	49	−4	.0017	−.0068	.234	.230	−.004	4.43	−.0177	+.0104	1505
27	49	42	−7	.0017	−.0119	.230	.228	−.002	4.43	−.0089	+.0030	1510
28	42	37	−5	.0017	−.0085	.228	.226	−.002	4.43	−.0089	+.0004	1515
29	37	32	−5	.0017	−.0085	.226	.224	−.002	4.43	−.0089	+.0004	1520
30	32	27	−5	.0017	−.0085	.224	.222	−.002	4.43	−.0089	+.0004	1525
31	27	23	−4	.0017	−.0068	.222	.220	−.002	4.43	−.0089	+.0021	1530
32	23	17	−6	.0017	−.0102	.220	.218	−.002	4.43	−.0089	−.0013	1535

Average N/A

Station Location ~~Fuski~~ Iwasaki Nursery

Address 2519 Pulgas Ave

City, State East Palo Alto

Certified tight N/A

Leak rate per hour continued next page

Operator Mark A. Fyo

pg. 4

04-042 (Rev. 7/92)

PERMANENT TANK CLOSURE INSPECTION SHEET

SITE NAME: Iwasaki Nursery DATE: 11/4/92
ADDRESS: 2519 Pulgas ave, East Palo Alto CA 94303
RESPONSIBLE PARTY: Sat Iwasaki CONTACT: same
ADDRESS: same PHONE: (415) 323-3787

PRE-INSPECTION INFORMATION HAS PERMIT BEEN ISSUED? X Y __N
PERMIT # HM 56592

AND SIZE OF TANKS: 1000 UL _____ REG _____ D
_____ WO _____ OTHER

REASON FOR REMOVAL: No longer desired
HISTORY INDICATE PROBLEM __Y X N EXPLAIN _____

DO MONITORING WELLS EXIST ON SITE? X Y __N (incidate on site map) Ag well (100 ft from tank pit)
DEPTH TO GROUNDWATER: ~~7 ft~~ Ft

ON-SITE INFORMATION (PREPARE SITE MAP ON SECOND PAGE)

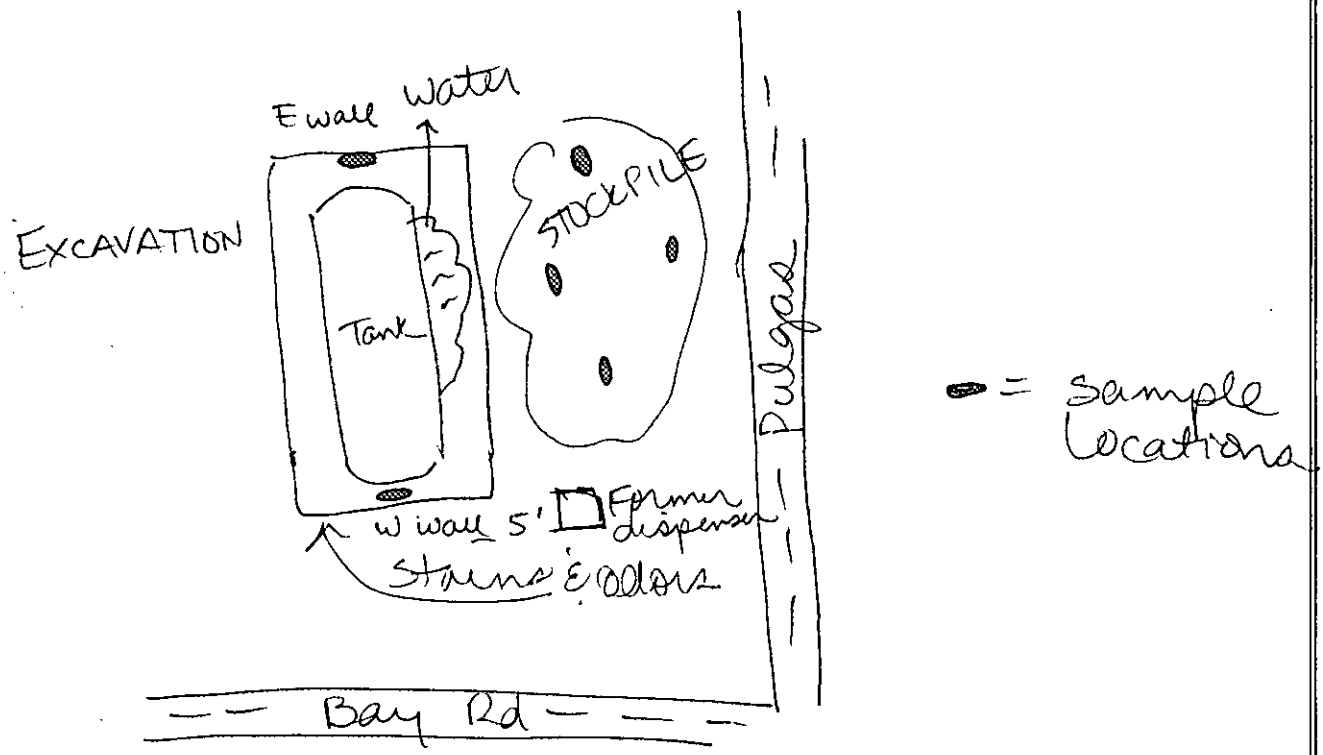
1. IS SITE SAFETY PLAN ON SITE: X Y __N
2. CONDITION OF TANKS AND PIPING: Numerous holes, bottom, sides and top.
3. EVIDENCE OF LEAKAGE? X Y __N Explain Sheen on water
4. WAS GROUNDWATER ENCOUNTERED IN PIT? X Y __N IF SO, DEPTH? 8 ft
   FLOATING PRODUCT? __Y X N SHEEN? X Y __N
   WAS WATER SAMPLED? __Y X N PIT PUMPED? __Y X N Will be pumped.
   VOLUME PUMPED (Approx) ? gal
5. INDICATE ON SITE PLAN WHERE SOIL/GW SAMPLES TAKEN See map.
6. ANALYSIS REQUIRED? X 5030 __3550/3510 X 8020/8240 __5520
   __601/624 __TEL __METALS __8010/8240 __8270
7. SAMPLES FROM STOCKPILE TAKEN? ~~X~~ Y X N If so, How Many 1 composite at a later date.
   VOLUME OF STOCKPILED SOIL? (Approx) ~10 cu yds
8. CHAIN OF CUSTODY CHECKED? __Y __N
9. SOIL/GW SAMPLING COMMENTS: Standard protocol
10. WAS PIT OVEREXCAVATED __Y X N Volume? _____ cu yds
    (Indicate on site map)
11. TANK MANIFEST #? 92200989 RINSATE MANIFEST#? _____
    PIT WATER MANIFEST #: _____

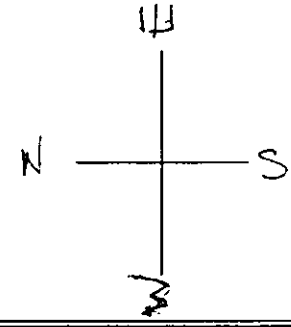
INSPECTOR: Jesse B Dasco
TITLE: HMS IV DATE: 11/4/92

RECEIVED BY: Steven R Wade (SEMCO) COMPANY: SEMCO
DATE: 11/04/92 PHONE #: 572-8033

printed on recycled paper

SITE MAP





Indicate: -North Arrow
-Cross Streets
-Excavation
-Sampling Points
-Stockpile(s)
-Structures
-Etc.

ADDITIONAL COMMENTS: LEL - 20% O_2 7%. Bring O_2 level below 5%. LEL 20% O_2 2% - OK to pull tank. Tank with many small holes, bottom, sides and top. Native soil badly stained w/ VERY STRONG odors.

Pit will be over-excavated and water pumped before sampling. Analyze all samples for TPH G and BTXE. Please schedule water sampling with me.

and composite sample

X [illegible]

printed on recycled paper

SAN MATEO COUNTY ENVIRONMENTAL HEALTH SERVICES DIVISION
590 HAMILTON STREET, REDWOOD CITY, CA 94063 - 3[illegible]05

UNDERGROUND TANK PROGRAM OFFICIAL INSPECTION REPORT

COUNTY NAME San Mateo COUNTY # 41

SITE NAME: IWASAKI Nursery INSPECTION DATE: 7-15-92

SITE ADDRESS: 2519 Pulgas Ave. CITY/STATE/ZIP East Palo Alto

CHANGES SITE/OWNER/PERMIT? YES (NO)
FORM A AND/OR B SUBMITTED? yes

TYPE OF INSPECTION: Initial
SITE COMPUTER #: 890017

	TANK 1	TANK 2	TANK	TANK
COMPUTER NUMBER	1	2		
PER #	1,000	10,000		
EXP.DATE / EXP. DATE				
TANK CONTENTS	unleaded	Diesel		

OPERATIONAL TANK	MAJOR	MINOR	TANK 1	TANK 2	TANK	TANK
PERMIT TO OPERATE	1	2				
CHANGE IN CONDITIONS TO OPERATE	3	4				
APPROVED CONSTRUCTION	5	6				
WRITTEN MONITORING PROCEDURES	7	8				
APPROVED MONITORING SYSTEM	9	10				
MONITORING SYSTEM	11	12				
APPROVED MONITOR FREQUENCY	13	14	✓	✓		
MONITORING RECORDS MAINTAINED	15	16	✓	✓		
ACCESS CASING SECURED	17	18				
PIPING	19	20				
INVENTORY RECONCILIATION	21	22	✓	✓		
TANK GAUGING	23	24	✓	✓		
APPROVED RESPONSE PLAN	25	26				
UNAUTHORIZED RELEASE OCCURRENCE	27	28				
SAMPLING	29	30				
APPROVED TANK REPAIRS	31	32				
UNAUTHORIZED RELEASES REPORTED	33	34				
SAFETY HAZARD	35	36				
CONDITIONS ABATED		37				

TEMPORARY TANK CLOSURE	MAJOR	MINOR	TANK 1	TANK 2	TANK	TANK
REMOVAL OF RESIDUAL	38	39				
FLAMMABLE VAPORS REMOVED	40					
ACCESS LOCATIONS SEALED	41	42				
POWER DISCONNECTED		43				
OWNER/OPERATOR MONITORING	44	45				

PERMANENT TANK CLOSURE	MAJOR	MINOR	TANK 1	TANK 2	TANK	TANK
REMOVAL OF RESIDUAL MATERIALS	46	47				
PIPING	48	49				
FLAMMABLE VAPORS REMOVED	50					
UNAUTHORIZED RELEASE	51	52				
SAMPLING	53	54				
IMPROPER ABANDONMENT	55	56				

SYSTEM STATUS (MUST MARK ONE)

MAJOR VIOL. 57 [ ] MINOR VIOL. 58 [X] NO VIOL. 59 [ ]

THE MARKED ITEMS REPRESENT VIOLATIONS AND MUST BE CORRCTED AS FOLLOWS: Tank #1 1,000 gallon unleaded gas will be removed in 90 days. — tank #2 10,000 Diesel P. tank test in 6 months. —

OFFICE: Env. Health

INSP.: Eduardo Montufar

TITLE: Haz. Mat. Spec. III

RECEIVED BY: x [signature]

PHONE: x 3233787

RECK:

WHITE — OFFICE COPY CANARY — OWNER COPY PINK — FILE COPY

SAN MA[illegible]O COUNTY ENVIRONMENTAL HEALTH [illegible]RVICES DIVISION
[illegible]90 HAMILTON STREET, REDWOOD CITY, CA 940[illegible] 363-4305

UNDERGROUND TANK PROGRAM OFFICIAL INSPECTION REPORT

COUNTY NAME **COUNTY #**

SITE NAME: Sat Iwasaki Nursery INSPECTION DATE: 7/25/90

SITE ADDRESS: 2519 Pulgas Ave. CITY/STATE/ZIP East Palo Alto

CHANGES SITE/OWNER/PERMIT? YES NO
FORM A AND/OR B SUBMITTED?

TYPE OF INSPECTION: 1
SITE COMPUTER #: 490017

	TANK CONTENTS MAJOR	TANK CONTENTS MINOR	TANK COMPUTER NUMBER / PER # / EXP. DATE	TANK COMPUTER NUMBER / PER # / EXP. DATE	TANK COMPUTER NUMBER / PER # / EXP. DATE	TANK COMPUTER NUMBER / PER # / EXP. DATE
OPERATIONAL TANK			Yes	Pressed		
PERMIT TO OPERATE	1	2				
CHANGE IN CONDITIONS TO OPERATE	3	4				
APPROVED CONSTRUCTION	5	6	closed			
WRITTEN MONITORING PROCEDURES	7	8				
APPROVED MONITORING SYSTEM	9	10				
MONITORING SYSTEM	11	12				
APPROVED MONITOR FREQUENCY	13	14				
MONITORING RECORDS MAINTAINED	15	16				
ACCESS CASING SECURED	17	18				
PIPING	19	20				
INVENTORY RECONCILIATION	21	22				
TANK GAUGING	23	24				
APPROVED RESPONSE PLAN	25	26				
UNAUTHORIZED RELEASE OCCURRENCE	27	28				
SAMPLING	29	30				
APPROVED TANK REPAIRS	31	32				
UNAUTHORIZED RELEASES REPORTED	33	34				
SAFETY HAZARD	35	36				
CONDITIONS ABATED	37					
TEMPORARY TANK CLOSURE						
REMOVAL OF RESIDUAL	38	39				
FLAMMABLE VAPORS REMOVED	40					
ACCESS LOCATIONS SEALED	41	42				
POWER DISCONNECTED		43				
OWNER/OPERATOR MONITORING	44	45				
PERMANENT TANK CLOSURE						
REMOVAL OF RESIDUAL MATERIALS	46	47				
PIPING	48	49				
FLAMMABLE VAPORS REMOVED	50					
UNAUTHORIZED RELEASE	51	52				
SAMPLING	53	54				
IMPROPER ABANDONMENT	55	56				

SYSTEM STATUS (MUST MARK ONE)

MAJOR VIOL. 57 ☐ MINOR VIOL. 58 ☐ NO VIOL. 59 ☐

THE MARKED ITEMS REPRESENT VIOLATIONS AND MUST BE CORRECTED AS FOLLOWS:
- will check on Ag. exemption
7-31 Exempt until office policy is established RH

OFFICE:

INSP: Hiemstra

TITLE: HMS II

RECEIVED BY:

PHONE:

RECK:

White - office copy Canary - owner copy Pink - file copy

SAN MA[illegible]O COUNTY ENVIRONMENTAL HEALTH [illegible]RVICES DIVISION
[illegible]90 HAMILTON STREET, REDWOOD CITY, CA 940[illegible] [illegible]363-4305

UNDERGROUND TANK PROGRAM OFFICIAL INSPECTION REPORT

COUNTY NAME **COUNTY #**

SITE NAME: Sat Iwasaki Nursery INSPECTION DATE: 7/2/90

SITE ADDRESS: 2519 Pilgas Ave. CITY/STATE/ZIP East Palo Alto

CHANGES SITE/OWNER/PERMIT? YES NO
FORM A AND/OR B SUBMITTED?

TYPE OF INSPECTION: 1
SITE COMPUTER #: 090017

	TANK	TANK	TANK	TANK
	COMPUTER NUMBER	COMPUTER NUMBER	COMPUTER NUMBER	COMPUTER NUMBER
	PER #	PER #	PER #	PER #
	EXP. DATE	EXP. DATE	EXP. DATE	EXP. DATE

OPERATIONAL TANK	TANK CONTENTS MAJOR	TANK CONTENTS MINOR				
PERMIT TO OPERATE	1	2				
CHANGE IN CONDITIONS TO OPERATE	3	4				
APPROVED CONSTRUCTION	5	6	check			
WRITTEN MONITORING PROCEDURES	7	8				
APPROVED MONITORING SYSTEM	9	10				
MONITORING SYSTEM	11	12				
APPROVED MONITOR FREQUENCY	13	14				
MONITORING RECORDS MAINTAINED	15	16				
ACCESS CASING SECURED	17	18				
PIPING	19	20				
INVENTORY RECONCILIATION	21	22				
TANK GAUGING	23	24				
APPROVED RESPONSE PLAN	25	26				
UNAUTHORIZED RELEASE OCCURRENCE	27	28				
SAMPLING	29	30				
APPROVED TANK REPAIRS	31	32				
UNAUTHORIZED RELEASES REPORTED	33	34				
SAFETY HAZARD	35	36				
CONDITIONS ABATED	37					

TEMPORARY TANK CLOSURE						
REMOVAL OF RESIDUAL	38	39				
FLAMMABLE VAPORS REMOVED	40					
ACCESS LOCATIONS SEALED	41	42				
POWER DISCONNECTED		43				
OWNER/OPERATOR MONITORING	44	45				

PERMANENT TANK CLOSURE						
REMOVAL OF RESIDUAL MATERIALS	46	47				
PIPING	48	49				
FLAMMABLE VAPORS REMOVED	50					
UNAUTHORIZED RELEASE	51	52				
SAMPLING	53	54				
IMPROPER ABANDONMENT	55	56				

SYSTEM STATUS (MUST MARK ONE)

MAJOR VIOL. 57 ☐ MINOR VIOL. 58 ☐ NO VIOL. 59 ☐

THE MARKED ITEMS REPRESENT VIOLATIONS AND MUST BE CORRECTED AS FOLLOWS:
- will check on Ag. exemption
7-31 Exempt until office policy is established RH

OFFICE:

INSP: [illegible]

TITLE: [illegible]

RECEIVED BY:

PHONE:

RECK:

White - office copy Canary - owner copy Pink - file copy

SATORU IWASAKI NURSERY INC.

Enclosed copy of Tank disposal as per requested.

12/8/86

2519 Pulgas Ave. / East Palo Alto, CA 94303 / (415) 323-3787

No. 05177

SHIP SERVICE COMPANY

220 CHINA BASIN
SAN FRANCISCO, CA 94107
PHONE (415) 543-4835

Order No. 4143 Date 12/5 1986

Name TOUCHATT TRUCKING

Address FROM SATORU IWASAKI NURSERY

Ship To 2519 PULGAS AVE

Address

WHEN SHIP	HOW SHIP	TERMS	BUYER	SALESMAN

1		2,000 gal steel tank, to be scrapped last contained stove oil			
		Paid check # 5165 $885.50			

COUNTY OF SAN MATEO

DEPARTMENT OF PUBLIC HEALTH AND WELFARE

INTRA-DEPARTMENTAL MEMORANDUM

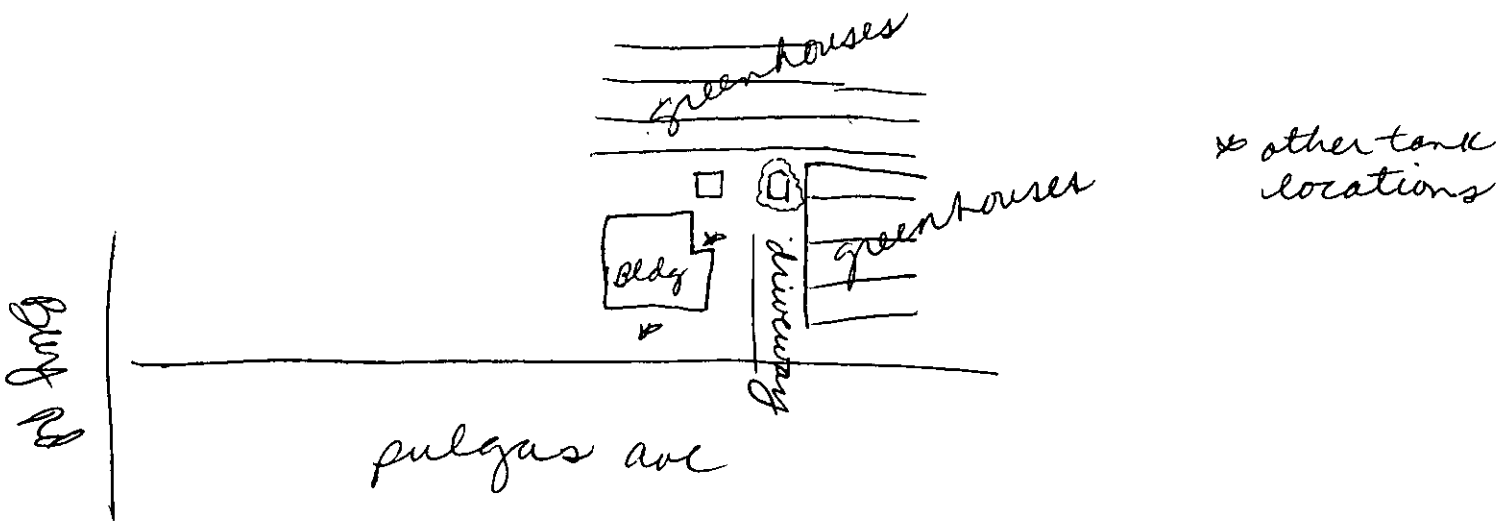
DATE 12-4-86

TO: File

FROM: K Jow

SUBJECT: 2000 UGT removal (diesel)

12-4-86 8:30am Met at site w/ S. Iwasaki + Jack Hollywood (MPFPD). Checked tank w/ LEL meter ⇒ 2% LEL. OKed tank ~~at~~ for pull. Some difficulty ~~w~~ w/ removal - proximity to greenhouse. Tank had some rusting but ~~to~~ no evident holes. Soil immediately beneath both ends of the tank ~~and~~ had no product odor (backfill material and natural). I waived the soil sampling ~~a~~ requirement due to the lack of contamination evidence. Informed Mr. Iwasaki of 30day tank disposition verification



SAN MATEO COUNTY
ENVIRONMENTAL HEALTH
JUN 21 1993
RECEIVED

SATORU IWASAKI NURSERY INC.

San mateo co.
Environ. Health
590 Hamilton St.
Redwood city, Ca. 94063
Re: UST

Dear sir:

We are requesting temporary closure for the 10,000 gal. tank which is empty. There is no power going to the tank or pump. all piping is disconnected and plugged.

Sincerely,
Ramma Iwasaki
for
Satoru Iwasaki Nsy.

2519 Pulgas Ave. / East Palo Alto, CA 94303 / (415) 323-3787

6-14-93.

Department of Health Services
ENVIRONMENTAL HEALTH SERVICES DIVISION

COUNTY OF SAN MATEO
590 HAMILTON STREET • REDWOOD CITY • CALIFORNIA 94063

BOARD OF SUPERVISORS
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TOM HUENING
MICHAEL D. NEVIN

MARGARET TAYLOR
DIRECTOR OF HEALTH SERVICES

(415) 363-4305
FAX # (415) 363-7882

Jennifer,

Please delete.

- Thanks

June 8, 1993

Iwasaki Nursery
Mr. Satoru Iwasaki
2519 Pulgas Ave.
East Palo Alto, CA 94303

Re: Temporary closure for 10,000 gal tank

Dear Mr. Iwasaki

FEB 2 - 1994 Michael

Per our telephone conversation, this office approves a temporary closure for this underground tank. On June 8, 1994, this temporary closure period will end and you must bring these tanks back in service and monitor them in accordance with State law or properly abandon them. An additional 12 month extension may be granted only by written request. Please submit a letter stating that the actions described below have been taken.

Within thirty (30) days from the receipt of this letter, the following actions must be taken:

1) All residual liquid, solids, or sludges shall be removed and disposed of under UHWM.

2) Except for required venting, all fill and access locations and piping must be sealed utilizing locking caps or concrete plugs.

3) Power service must be disconnected from all pumps unless the power services some other equipment which is not being closed such as the cathodic protection system.

4) The owner or operator must inspect the UST at least once every three months to verify the temporary closure measures are still in place. The inspection shall include visual inspection of all locked caps and concrete plugs and a determination of whether any water has entered the tank.

5) The owner may terminate temporary closure and reuse the tank **only** upon approval by the local agency.

If you have any further questions regarding this issue, please contact me at (415) 363-4719.

Sincerely,

Miguel Trujillo
Hazardous Materials Specialist II

cc: Dean Peterson, Program Manager

UNDERGROUND TANK WRITTEN MONITORING PLAN

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JUN 7 1993

RECEIVED

GENERAL BUSINESS INFORMATION
(THIS PAGE MUST BE COMPLETED BY ALL OPERATORS)

FACILITY IDENTIFICATION

1. Business Name Satoru Iwasaki Nsy. Inc.
2. Business Address 2519 Pulgas Ave City E. Palo Alto
3. Business Phone (415) 323-3787
4. Tank Owner Name same as above
5. Tank Owner Address " " City "
6. Tank Owner Phone " "

CONTACT INFORMATION (PERSON(S) RESPONSIBLE FOR PERFORMING MONITORING AND/OR MAINTAINING EQUIPMENT)

1. Contact Name Satoru or Emma Iwasaki
2. Contact Title Owner Phone Same as above
3. Contact Address same as above City " " "

24 HOUR EMERGENCY CONTACT INFORMATION

1. Primary Contact Name Satoru Iwasaki Day Phone 323-3787
   Title Owner Night Phone 365-0506
2. Secondary Contact Name Emma Iwasaki Day Phone 323-3787
   Title Owner Night Phone 365-0506

TANK INFORMATION

1. Number of tanks 1
2. Product Stored/Tank Size

Tank 1	10,000 / Empty.	Tank 5	/
Tank 2	/	Tank 6	/
Tank 3	/	Tank 7	/
Tank 4	/	Tank 8	/

MONITORING PLAN OPTION SELECTED _____

TRAINING

The training necessary to operate the tank system and monitoring equipment includes: _____

I hearby certify that the monitoring plan described in this document will be followed in its entirety.

Emma Iwasaki — Name

6-5-93 — Date

See attached Information sheet sent to you on 5-6-93.

Department of Health Services
ENVIRONMENTAL HEALTH SERVICES DIVISION

COUNTY OF SAN MATEO
590 HAMILTON STREET • REDWOOD CITY • CALIFORNIA 94063

BOARD OF SUPERVISORS
RUBEN BARRALES
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MICHAEL D. NEVIN

MARGARET TAYLOR
DIRECTOR OF HEALTH SERVICES
(415) 363-4305
FAX (415) 363-7882

May 28, 1993

Sat Iwasaki
2519 Pulgas Avenue
East Palo Alto, CA 94303

SUBJECT: Permit Status of Underground Tank System
LOCATION: 2519 Pulgas Avenue, EPA

Dear Tank Owner:

A recent review of your file has indicated that your facility has not been issued a Final Permit To Operate Hazardous Materials Underground Storage Tanks. In order to obtain a permit to operate, you must submit the following items within 30 days:

__State Water Resources Control Board Forms A&B

_X_Current test results for: **(10,000 gal. tank)**
- _x_Tanks
- _x_Piping
- __Leak detectors
- __Dispenser meter calibration
- __Soil and/or water samples from previous tank removal
- __Quarterly monitoring well sampling

_X_Written monitoring plan for underground tank system

__Response plan for removal of product from secondary containment

_X_Annual inventory reconciliation forms

__ Change of ownership information

The appropriate forms are being enclosed to assist you in complying with the above requirements. Upon receipt of all required information, a Permit To Operate will be issued to your facility which will be valid for five years. Be advised however, that failure to comply with the above requirements within the given time frame represent violations for which civil penalties carrying fines ranging from $500 to $5,000 per violation per day may be assessed.

Also, if your system utilizes pressurized piping, you must install in-line leak detectors by December 22, 1990. In addition, all single wall UST's must be replaced or upgraded to prevent releases due to corrosion, spills or overfills by December 22, 1998. Finally, if you own between one and twelve (12) underground storage tanks, you must provide proof of financial responsibility to this agency by December 31, 1993.

If you have any questions regarding the above requirements, you may contact me at (415) 363-4719.

Sincerely,

Miguel Trujillo

Miguel Trujillo
Hazardous Materials Specialist II

Enclosure

cc: Dean Peterson, Hazardous Materials Program Manager

ACCOUNT INQUIRY

Account	Rec Cde	Description	Area Code	Phone	Ext	Trans Date	Operator
000001967	111	SAT IWASAKI NURSERY INC		-		01/13/87	WAGNER
	121	2519 PULGAS AVE		-		01/13/87	WAGNER
	124	EAST PALO ALTO CA94303		-		01/13/87	WAGNER
	131	S890017		-		01/13/87	WAGNER
	211	SAT IWASAKI NURSERY INC		323-3787		01/13/87	WAGNER
	221	2519 PULGAS AVE		-		01/13/87	WAGNER
	224	EAST PALO ALTO CA94303		-		01/13/87	WAGNER
				-		/ /	
				-		/ /	
				-		/ /	

Rec Cde	Bill Number	Category	Unit	Mo	C	Fee	Description	Trans Date	Operator
411	000001967	DB03.01	2	01		.00	AGRICULTURAL MOTOR FUEL TANK	01/13/87	WAGNER
		.				.		/ /	
		.				.		/ /	
		.				.		/ /	
		.				.		/ /	

1 10,000 gal tank remains 11-19-92
remains in Billing K.C.

DEC 2 1 1992

Delete 1 TK
1 TK remains
11-19-92

Department of Health Services
ENVIRONMENTAL HEALTH SERVICES DIVISION

BOARD OF SUPERVISORS
ANNA G. ESHOO
MARY GRIFFIN
TOM HUENING
TOM NOLAN
WILLIAM J. SCHUMACHER

COUNTY OF SAN MATEO

MARGARET TAYLOR
DIRECTOR OF HEALTH SERVICES

590 HAMILTON STREET • REDWOOD CITY • CALIFORNIA 94063 363-4305

June 24, 1992

Mr. Sat Iwasaki
2519 Pulgas Avenue
East Palo Alto, CA. 94303

SUBJECT: Underground Storage Tanks
LOCATION: 2519 Pulgas Avenue, East Palo Alto, CA 94303

Dear Mr. Iwasaki:

A recent review of your file has indicated that your facility has not been issued a Final Permit To Operate Hazardous Materials Underground Storage Tanks. In order to obtain a permit to operate, you must submit the following items within 30 days.

__✓__State Water Resources Control Board Forms A&B

__✓__Current test results for:
- __✓__Tanks
- __✓__Piping
- ____Leak detectors
- ____Dispenser meter calibration
- ____Soil and/or water samples from previous tank removal
- ____Quarterly monitoring well sampling

__✓__Written monitoring plan for underground tank system

____Response plan for removal of product from secondary containment

__✓__Annually inventory reconciliation forms

____Change of ownership information

Department of Health Services
PUBLIC HEALTH DIVISION — Environmental Health

BOARD OF SUPERVISORS
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JOHN M. WARD

COUNTY OF SAN MATEO

MARGARET TAYLOR
DIRECTOR OF HEALTH SERVICES

590 HAMILTON STREET • REDWOOD CITY • CALIFORNIA 94063 363-4305

January 7, 1987

Satoru Iwasaki
Sat Iwasaki Nursery Inc.
2519 Pulgas Avenue
East Palo Alto, CA 94303

Dear Mr. Iwasaki:

Per my inspection of the removal of the 2000 gallon underground diesel tank at your facility, You were informed that the remaining two underground tanks at your facility must be registered with this office. This office has not received any permit applications from you to this date.

I have enclosed the proper applications for you to complete and submit to this office along with the proper fee ($55.00 per tank). Please submit these materials to this office within twenty-one (21) days after the receipt of this letter.

Pursuant to San Mateo County Ordinance No. 02865, all underground tanks storing hazardous materials, either presently of previously, must be brought under permit, inspected and monitored, or properly abandoned to the satifaction of this office.

If you have any questions, please contact me (415) 363-4565.

Sincerely,

Katherine I. Low

Katherine I. Low
Hazardous Materials Section

cc: Philip Duffy, Assistant Director

P 009 561 150

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Satoru Iwasaki Nursery	
Street and No. 2519 Pulgas Ave	
P.O., State and ZIP Code East Palo Alto, CA 94303	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, Feb. 1982 ★ U.S.G.P.O. 1984-446-014

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.
3. Article Addressed to:
   Satoru Iwasaki Nursery
   2519 Pulgas Ave
   East Palo Alto, CA 94303
4. Type of Service: ☐ Registered ☑ Certified ☐ Express Mail ☐ Insured ☐ COD
   Article Number: P 009 561 150

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
   X [signature]
6. Signature — Agent
   X
7. Date of Delivery
   11/19/86
8. Addressee's Address *(ONLY if requested and fee paid)*

PALO ALTO, CA MAIN OFFICE NOV 19 1986

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
- **Complete items 1, 2, 3, and 4 on the reverse.**
- **Attach to front of article if space permits, otherwise affix to back of article.**
- **Endorse article "Return Receipt Requested" adjacent to number.**

U.S. MAIL

PENALTY FOR PRIVATE USE, $300

NOV 20 10 47 AM '86

ENVIRONMENTAL HEALTH

RETURN TO

Katherine Low
~~Underground Tanks~~ (Name of Sender)
590 Hamilton St. 4th Floor
(No. and Street, Apt., Suite, P.O. Box or R.D. No.)
Redwood City, CA 94063
(City, State, and ZIP Code)

Department of Health Servic
PUBLIC HEALTH DIVISION — Environmental Health

BOARD OF SUPERVISORS
ANNA G. ESHOO
TOM NOLAN
WILLIAM J. SCHUMACHER
K. JACQUELINE SPEIER
JOHN M. WARD

COUNTY OF SAN MATEO

MARGARET TAYLOR
DIRECTOR OF HEALTH SERVICES

590 HAMILTON STREET • REDWOOD CITY • CALIFORNIA 94063 363-4305

November 18, 1986

Certified P 009 561 150

Satoru Iwasaki
Sat Iwasaki Nursery Inc.
2519 Pulgas Avenue
East Palo Alto, CA 94303

Dear Mr. Iwasaki:

This letter is written in regards to the underground storage tanks at your facility. On July 5, 1986 you applied for a permit to abandon a 2000 diesel tank. This permit is current until January 5, 1986.

According to our records, you have two underground tanks at your facility that have not been registered with this office. I have enclosed the proper applications for you to complete and submit to this office along with the proper fee ($55.00 per tank).

Pursuant to San Mateo County Ordinance No. 02865, all underground tanks storing hazardous materials, either presently of previously, must be brought under permit, inspected and monitored, or properly abandoned to the satifaction of this office.

If you have any questions, please contact me (415) 363-4565.

Sincerely,

Katherine I. Low

Katherine I. Low
Underground Tank Program
Hazardous Materials Section

cc: Philip Duffy, Assistant Director

Department of Health Services
PUBLIC HEALTH DIVISION — Environmental Health

BOARD OF SUPERVISORS
ANNA G. ESHOO
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JOHN M. WARD

COUNTY OF SAN MATEO

JAY GELLERT
DIRECTOR OF HEALTH SERVICES

590 HAMILTON STREET • REDWOOD CITY • CALIFORNIA 94063 363-4305

E. IWASAKI NURSERY

March 15, 1985

Dear Underground Tank Owners/Operators:

As a result of severe groundwater contamination caused by leaking underground storage tanks, the California legislature passed several bills which require owners and operators of underground tanks to assume certain responsibilities. This letter is intended to provide you with information regarding your obligations as an owner/operator of an underground tank facility and to assist you with compliance pursuant to the new laws.

AB 2013 (Cortese) required that all owners of underground hazardous materials storage facilities (including motor vehicle fuels) file a Hazardous Substance Storage Statement with the State Water Resources Board (Board) by January 1, 1985. If you have not filed a Statement with the Board, we have enclosed copies for your use. Although the deadline for filing has passed, it is mandatory that the Statements be submitted.

AB 1362 (Sher), AB 3565, AB 1584, and AB 3447 require several actions by owners and operators of underground storage tanks. The major components of the new laws specify construction standards for new or planned tank installations and, monitoring and leak detection requirements for existing tanks. New tank installation requirements call for double containment of all groundwater tanks, including piping systems. Existing tank monitoring and leak detection systems are required to be in place by July 1, 1985.

The Board is in the process of finalizing alternatives for monitoring and leak detection systems and establishing guidelines for compliance. Local health agencies, however, will have approval authority regarding location, number, depth and sampling frequency of monitoring wells and accompanying leak detection systems.

Your obligations when planning a monitoring or leak detection system, are to keep the local agency informed of all activities regarding your underground tanks (in this County, the Environmental Health Division (415) 363-4305).

(continued over)

Dear Sir:
Enclosed copy of State Water Resources Board memo regarding UGT located on farms which are exempt.
Thank you for your cooperation.

2519 Phillips Ave
EPA CA 94303
E. Iwasaki Jr
SAT IWASAKI NSY Inc.

Please note, that the costs associated with cleanup of an underground leak are astronomical, so money spent on leak prevention makes good sense and is easily justified. When looking at an effective leak detection and monitoring program, several items should be considered. If your tanks are over seventeen (17) years old, there is a 50% chance that they are leaking (EPA data on steel tanks). With this information and other supportive data, it may be more advantageous to save the expense of monitoring systems and to budget for replacement of the tank(s), within three (3) years, with a completely double contained system. If the monitoring requirements are not cost effective for the tanks at your facility, then tank removal may be the only feasible solution. Tank removals require permits, and soil sampling is required to determine if there has been any past contamination.

Other obligations pursuant to the new laws, require owners/operators to:

1) apply for a permit from the local agency (in this case, the San Mateo County Department of Health Services);

2) keep inventory and maintenance records; and

3) notify the local agency when an unauthorized release occurs, or if you plan to remove, repair or alter your underground tank system.

To apply for a permit, please complete the enclosed application and submit the appropriate fees. If additional forms are needed, they may be obtained from this office. Fees are based on the number of tanks at the facility. The first tank is $100.00, each additional tank is $35.00. Also, a State surcharge of $28.00 is required for each tank. As an example, a service station with 4 tanks would pay $100.00 for the first tank, $35.00 for each of the three remaining tanks ($105.00) and a $28.00 surcharge for each tank ($112.00) for a total of $317.00 for the facility.

County Environmental Health personnel will inspect your underground tank facilities, once a year, to determine whether the tanks comply with design and construction standards, whether the operator has monitored and tested the tank as required, and whether the tank is in safe operating condition. We are also able to provide you with resource lists and any information you may need to effectively begin your underground tank monitoring program.

Please call Paul Dana or John Rapp (415) 363-4305, if you have any questions regarding these issues.

Thank you for your cooperation.

Sincerely,

Mark A. Kostielney
Director
Office of Environmental Health

JH/dv

Enclosures: 1) Hazardous Materials Storage Statement
2) Underground Tank Permit Application

cc: Regional Water Quality Control Board

2/7/85

Betty,

A farmer, whose UGT is located on a farm, is exempt from the county or city permit process only if his tank falls in these categories: (from AB 3565 Sher, Section 25280 of the H & S Code)

- o Tank is used to store pesticides for cattle and is subject to the supervision of the agric. commissioner
- o Tank is located on a farm, stores motor vehicle fuel and fuel is used exclusively to propel vehicles for agric. purposes
- o Tank is used for aviation or motor vehicle fuel located one mile of a farm and used by a licensed pest control officer for agric. purposes
- o Sumps, separators, catch basins, etc. are exempt from the permit process only, but must still register these containers

Otherwise, the UGT is not exempt from the permit process. Please let the farmers and counties know this when they call.

Thank you.

Judy

County Ordinance 00 [illegible] - not exempt

PERMANENT TANK CLOSURE INSPECTION SHEET

SITE NAME: E. IWASAKI NURSERY DATE: 2/1/94
ADDRESS: 2519 PULGAS AVE., E. PALO ALTO
RESPONSIBLE PARTY: SAME CONTACT: EMMA IWASAKI
ADDRESS: PHONE: 323-3887

PRE-INSPECTION INFORMATION

HAS PERMIT BEEN ISSUED? X Y ___ N
PERMIT # HM 003-94

AND SIZE OF TANKS: ___ UL ___ REG 10,000 GAL D
___ WO ___ OTHER

REASON FOR REMOVAL: Discontinued Use.
HISTORY INDICATE PROBLEM X Y ___ N EXPLAIN LUFT site

DO MONITORING WELLS EXIST ON SITE? X Y ___ N (incidate on site map)
DEPTH TO GROUNDWATER: ___ Ft

ON-SITE INFORMATION (PREPARE SITE MAP ON SECOND PAGE)

1. IS SITE SAFETY PLAN ON SITE: X Y ___ N
2. CONDITION OF TANKS AND PIPING: In good condition - No holes
3. EVIDENCE OF LEAKAGE? ___ Y X N Explain No odors or soil discoloration
4. WAS GROUNDWATER ENCOUNTERED IN PIT? X Y ___ N IF SO, DEPTH? ___
   FLOATING PRODUCT? ___ Y X N SHEEN? ___ Y X N
   WAS WATER SAMPLED? X Y ___ N PIT PUMPED? ___ Y X N

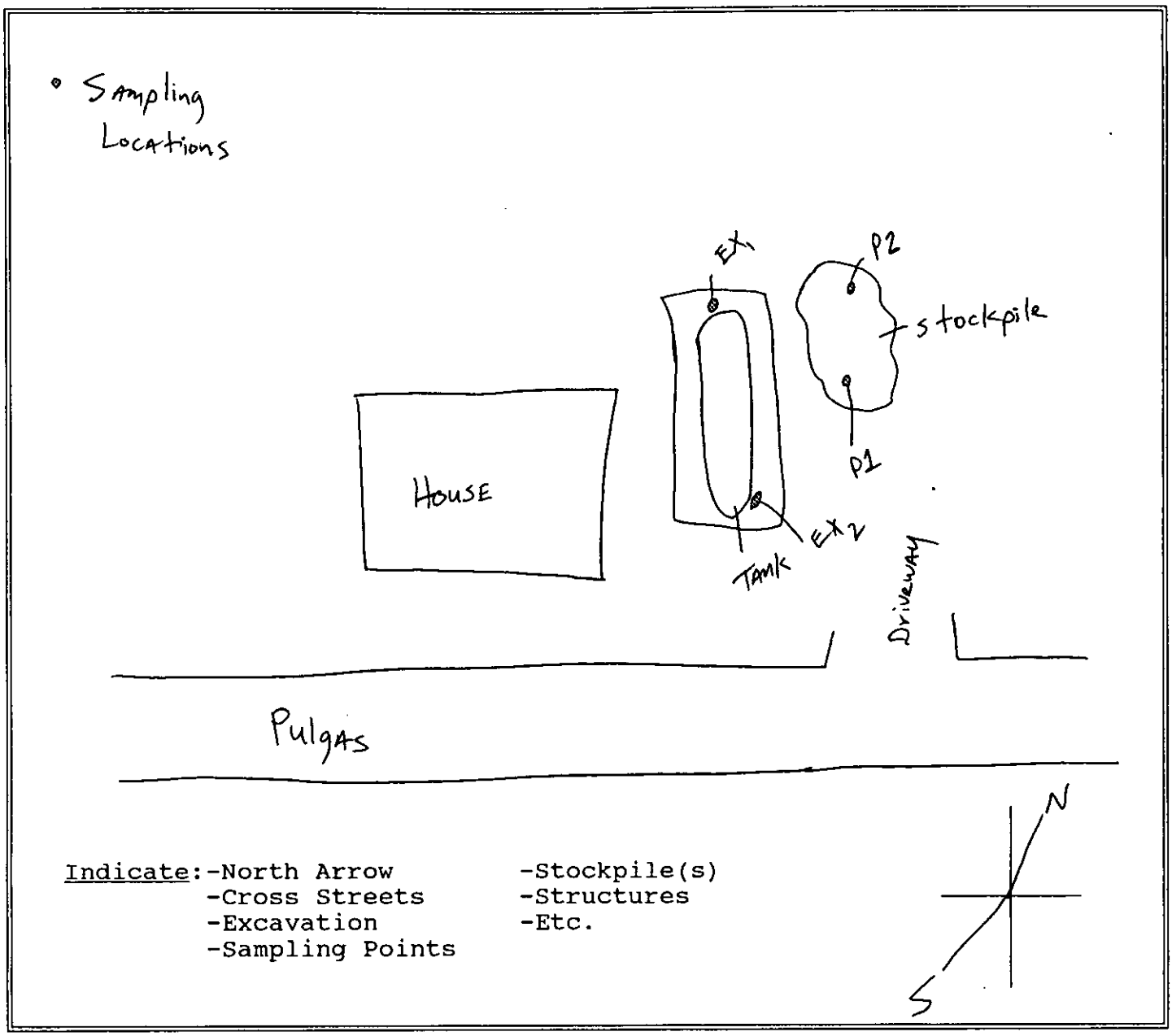
   VOLUME PUMPED (Approx) ___ gal
5. INDICATE ON SITE PLAN WHERE SOIL/GW SAMPLES TAKEN
6. ANALYSIS REQUIRED? ___ 5030 ___ 3550/3510 ___ 8020/8240 ___ 5520
   ___ 601/624 ___ TEL ___ METALS ___ 8010/8240 ___ 8270
7. SAMPLES FROM STOCKPILE TAKEN? X Y ___ N If so, How Many 2 composite
   VOLUME OF STOCKPILED SOIL? (Approx) 15 cu yds
8. CHAIN OF CUSTODY CHECKED? X Y ___ N
9. SOIL/GW SAMPLING COMMENTS: See next page
10. WAS PIT OVEREXCAVATED ___ Y X N Volume? ___ cu yds
    (Indicate on site map)
11. TANK MANIFEST #? 92218965 RINSATE MANIFEST#? ___
    PIT WATER MANIFEST #: ___

INSPECTOR: MIGUEL TRUJILLO
TITLE: HMS III DATE: 2/1/94

RECEIVED BY: DENG LEONG COMPANY: ___
DATE: 2/1/94 PHONE #: ___

printed on recycled paper

SITE MAP

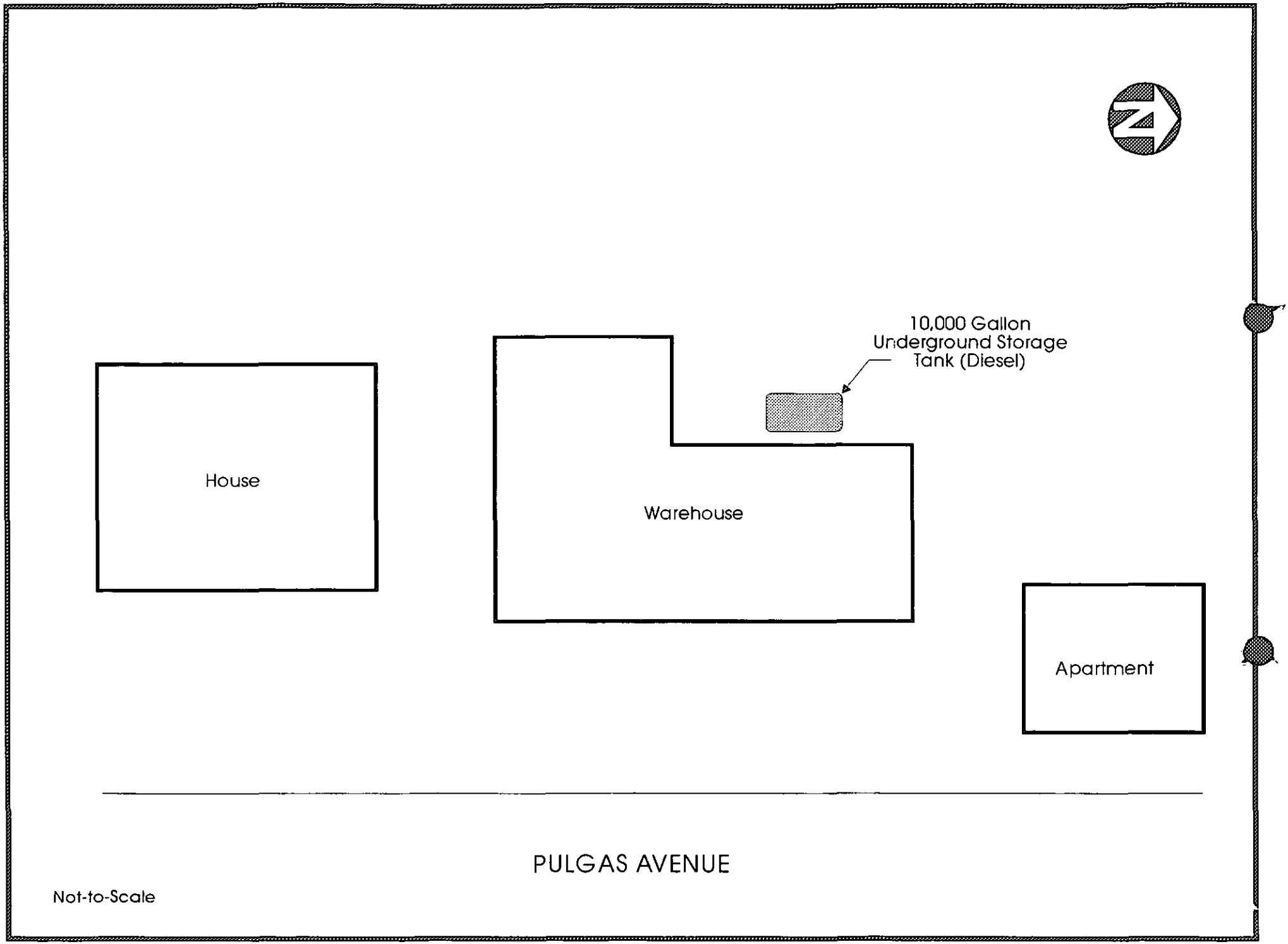


Indicate: -North Arrow
-Cross Streets
-Excavation
-Sampling Points
-Stockpile(s)
-Structures
-Etc.

ADDITIONAL COMMENTS:

- LEL & O_2 within Limits for removal.
- Bottom of tank at ≈ 10 feet.
- No odors or soil discoloration during the removal.
- Groundwater encountered and sampled.
- All samples Analyzed for BTX&E, TPH-D

printed on recycled paper


10,000 Gallon
Underground Storage
Tank (Diesel)
House
Warehouse
Apartment
PULGAS AVENUE
Not-to-Scale

N O T I C E

This site has a history of contamination. Information pertaining to the details of the contamination has been removed and relocated into files stored with the County LUFT Enforcement Program. (CLEP)

Dean Peterson
CLEP Haz Mat III

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

MAY 11 1993

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Satoru Iwasaki Nsy. Owner Satoru Iwasaki

Address 2519 PULGAS AVE. Mailing Address

City, Zip E. PALO ALTO, CA. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by E. Iwasaki Date 5-6-93

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

UGT
East Palo Alto

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063
ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
Diesel #2	2	10,000	5-6-93		Empty - used up and the fuel since we are phasing out our operation. Cannot continue losing money every year - Business is real bad.		

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JUL 0 2 1992

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nrsy Owner Sat Iwasaki

Address 2519 Pulgas Ave Mailing Address 2519 Pulgas Ave

City, Zip E Palo Alto 94303 Telephone 323 3787

[illegible] to the best of my knowledge. Any changes [illegible] the Department of Health Service within [illegible] (24) hours.

[illegible] by Sat Iwasaki Date June 29, 1992

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

Form:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	325 gal	6/25/92	12:25	325 gal	6/29/92	4145 pm
diesel	#2	50½" from top	6/25/92	12:28	50½ from top	6/29/92	4150 pm

COUNTY OF SAN MATEO
Office of Environmental Health
Hazardous Materials Management Program
Underground Storage Tanks
590 Hamilton Street
Redwood City, CA 94063

ANNUAL INVENTORY RECONCILIATION REPORT
"Must submit this form to County once a year"

Time Period _____ (month) _____ (year) through _____ (month) _____ (year)

Check One

✓ I hereby certify that ~~daily~~ inventory reconciliation/~~weekly~~ Monthly tank gauging records have shown measurements within the allowable error limits as determined by the California Undergroundg Storage Tank Regulations, CAC, Title 23, Chapter 3, Subchapter 16.

_____ Daily inventory reconciliation/weekly tank gauging records have indicated discrepencies in excess of the allowable error limits as stated below:

Date	Tank	Error Limit	Actual Error (gallons)

**(Attach additional sheets as necessary)

Name of Facility: Sat Iwasaki Nrsy. Date: 6/29/92

Address: 2519 Pulgas Ave. City: E. Palo Alto

Signature: Sat Iwasaki Title: owner
(Person filing report)

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH
MAY 21 1992
RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nursery Owner Pat Iwasaki

Address 2519 Pulgas Ave. Mailing Address 2519 Pulgas Ave.

City, Zip E. Palo Alto, 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 5/20/92

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
[illegible] Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. following 48 hr. hold	Date	Time
unleaded	#1	439 gal	5/18/92	10:30	5/20/92 439 gal	5/20/92	12:30
diesel	#2	51" from top	5/18/92	10:35	same	5/20/92	12:35

SAN MATEO COUNTY
ENVIRONMENTAL [illegible]

MAY 01 1992

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility: Pat Iwasaki Nursery Owner: Pat Iwasaki

Address: 2579 Pulgas Ave. Mailing Address: 2579 Pulgas Ave.

City, Zip: E. Palo Alto 94303 Telephone: 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twenty four (24) hours.

Submitted by: Pat Iwasaki Date: 4/30/92

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Pat Iwasaki
2579 Pulgas Ave.
E. Palo Alto, Ca 94303

San Mateo County Health Department
500 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded Gas	#1	494 gal	4/28/92	7:10 AM	497 gal	4/30/92	12:25 PM
Diesel	#2	50½" from Top	4/28/92	7:06 AM	same	4/30/92	12:28 PM

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

MAR 27 1992

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility SAT Iwasaki Nay Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave E.P.A.

City, Zip E. Palo Alto, Ca 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 3/26/92

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	599 gal	3/24/92	3:00 PM	599 gal	3/26/92	12:15 PM
diesel	#2	50½" from top	3/24/92	3:03	same	3/26/92	12:18 PM

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

FEB 26 1992

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nursery Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave

City, Zip E. Palo Alto 94303 Telephone 323 3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 2/25/92

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	700 gal.	2/21/92	10:50	700 gal	2/25/92	9:45
Diesel	#2	51 from top	2/21/92	10:53	same	2/25/92	9:60

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JAN 28 1992

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name Pat Iwasaki Nursery Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address Same

City, ZIP E. Palo Alto, Ca. Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twenty four (24) hours.

Submitted by Pat Iwasaki Date 1-24-92

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

Name

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Minor Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. following 48 hr. hold	Date	Time
unleaded	#1	811 gal	1-21-92	10:23	811 gal	1/24/92	3:02 PM
Diesel	#2	51" from Top	1-24-92	10:05	same	1/24/92	3:05 PM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nrsy. Owner Pat Iwasaki

Address 2519 Pulgas Ave. Mailing Address 2579 Pulgas Ave

City, Zip E. Palo Alto, Ca. 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 12/24/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH
DEC 30 1991
RECEIVED

San Mateo County Health Department
599 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	589 gal	12/18/91	10:45AM	589 gal	12/24/91	9:05AM
Diesel	# 2	51 from top	12/18/91	10:45AM	same	12/24/91	9:05AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nrsy Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave.

City, Zip E. Palo Alto Ca 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 8/28/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH
AUG 30 1991
RECEIVED

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unlead	#1	225 gal	8/26/91	3:30PM	225 gal	8/28/91	3:00PM
diesel	#2	51½" from top	8/26/91	3:33PM	same	8/28/91	3:05PM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nursery Owner Pat Iwasaki

Address 2519 Pulgas Ave. Mailing Address 2519 Pulgas Ave E.P.A.

City, Zip E Palo Alto, Ca 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

SAN MATEO COUNTY ENVIRONMENTAL HEALTH

JUL 30 1991

RECEIVED

Submitted by Pat Iwasaki Date 7/24/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	565 gal	7/24/91	10:45 AM	565 gal	7/24/91	11:25 AM
Diesel	#2	50½" from top	7/24/91	10:50 AM	same	7/26/91	11:27 AM

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JUL 0 2 1991

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nursery Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave. E.P.A.

City, Zip E. Palo Alto 94303 Telephone 323 3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 6/28/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	658 gal	6/25/91	12:05 pm	658 gal	6/25/91	2:00 pm
Diesel	#2	51" from top	6/25/91	12:05 pm	same	6/25/91	2:03 pm

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nrys Owner Pat Iwasaki

Address 2519 Pulgas Ave Mailing Address 2519 Pulgas Ave

City, Zip E. Palo Alto, Ca 94303 Telephone 323 3787

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

MAY 30 1991

RECEIVED

Submitted by Pat Iwasaki Date 5/29/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

Pat Iwasaki
2519 Pulgas Ave
E. Palo Alto, Ca

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	774 gal	5/24/91	11:40 AM	774 gal	5/29/91	8:35 AM
Diesel	#2	51½ from top	5/24/91	11:43 AM	same	5/29/91	8:37 AM

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

MAY - 2 1991

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name Pat Iwasaki Nursery Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave.

City, Zip E. Palo Alto Ca. 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date April 30, 1991

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	880 gal	4/28	8:30	880 gal	4/30	9:45 AM
Diesel	#2	57½ from top	4/28	8:32	same	4/30	9:50 AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Jat Surasaki Bray Owner Jat Surasaki

Address 2519 Pulgas Ave. Mailing Address 2519 Pulgas Ave.

City, Zip E. Palo Alto, Ca. 94303 Telephone 3733787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Jat Surasaki Date 3/29/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

APR 01 1991

RECEIVED

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unlead gas	#1	981 gal	3/25/91	11:32 AM	981 gal	3/29/91	11:45 AM
Diesel	#2	511½" from Top	3/25/91	11:35 AM	Same	3/29/91	11:30 AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Swasaki Nrsy. Owner Sat Swasaki

Address 2519 Pulgar Ave. Mailing Address 2519 Pulgar Ave.

City, Zip E. Palo Alto, Ca 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Swasaki Date 2/23/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	280 gal	2/20/91	10:20AM	280 gal	2/23/91	9:30AM
diesel	#2	51" from top	2/20/91	10:24AM	same	2/23/91	9:33AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nursery Owner Sat Iwasaki

Address 2519 Pulgas Ave. Mailing Address same

City, Zip E. Palo Alto, Ca 94303 Telephone 323 3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 1/25/91

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH
JAN 28 1991
RECEIVED

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quantity Lbs. or Gals.	Date	Time	Quantity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	410 gal	1/23/91	11:15AM	410 gal	1/25/91	9:15AM
diesel	#2	51" from top	1/23/91	11:15AM	same	1/25/91	9:15AM

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

JAN 03 1991

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Art Surowski Nursery Owner Art Surowski

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave. E.P.A

City, Zip E. Palo Alto, Ca 94303 Telephone 323 3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Art Surowski Date 12/31/90

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	483	12/27/90	11:05 am	483	12/31/90	9:05 AM
diesel	#2	51" from top	12/27/90	11:10 AM	51" from top	12/31/90	9:10 AM

SAN MATEO COUNTY
ENVIRONMENTAL HEALTH

DEC 03 1990

RECEIVED

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Swasaki Nrsy. Owner Sat Swasaki

Address 2519 Pulgas Ave. Mailing Address 2519 Pulgas Ave.

City, Zip E. PA. 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Swasaki Date 12/1/90

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unlead	#1	585 gal	11/27/90	11:35 AM	585 gal	12/1/90	10:06 AM
Diesel	#2	57" from top	11/27/90	11:37 AM	51" from top	12/1/90	10:05 AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Owner same

Address 2579 Pulgas Ave. Mailing Address same

City, Zip E. Palo Alto 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 7/25/90

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	empty	7/19/90	7:20AM			
Diesel	#2	51" from top	7/19/90	7:00AM	51" from top	7/25/90	10AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Jack Iwasaki Dairy Owner same

Address 7519 Pulgas Ave. Mailing Address same

City, Zip E. Palo Alto Ca. 94303 Telephone 3733787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Jack Iwasaki Date Feb. 13, 1989

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	784 gal	2/10/89	11:45 AM	784 gal	2/13/89	2:20 PM
Diesel	#2	22" from top	2/10/89	11:50 AM	same	2/13/89	2:25 PM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nry. Owner Pat Iwasaki

Address 2519 Pulgas Ave. Mailing Address same

City, Zip E. P.A., 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 6/13/88

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

JUN 15 2 29 PM '88
ENVIRONMENTAL HEALTH

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	680 gal	6/9/88	10:30 AM	680 gal	6/13/88	3:48 PM
Diesel	#2	21 1/2 from top	6/9/88	10:35 AM	same	6/13/88	4:00 PM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Pat Iwasaki Nursery. Owner Pat Iwasaki

Address 2579 Pulgas Ave. Mailing Address 2579 Pulgas Ave.

City, Zip 94303 Telephone 3233787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Pat Iwasaki Date 10/12/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Pat Iwasaki
2579 Pulgas Ave.
E. P.A.

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	889 gal	10/9/87	11:30 pm	889 gal	10/12/87	11:30 AM
Diesel	#2	70" from top of filler pipe	10/9/87	11:32 pm	same	10/12/87	11:32 AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 9/14/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Sat Iwasaki
2519 Pulgas Ave.
E. P.A.

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

AUG 16 5 34 AM '87
ENVIRONMENTAL HEALTH

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	1030 gal	9/11/87	1:00 P.M.	1030 gal	9/14/87	9:00AM
Diesel	#2	20" from top of fill cap	9/11/87	1:05PM	Same as 9/11/87	9/14/87	9:05AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy. Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 5/11/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Sat Iwasaki Nsy.
2519 Pulgas Ave.
E.P.A.

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unlead gas	#1	571 gal	5/8	2:30PM	571 gal	5/11/87	11:AM
Diesel	#2	21" from top of filler	5/8	2:31PM	21" from Top	5/11/87	11:03AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 4/13/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

S. Iwasaki
2519 Pulgas Ave.
E. Palo Alto

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	709	4/10	12:05	709	4/13	1:30
Diesel	#2	21½ top of fill	4/10	12:06	21½" top fill pipe	4/13	1:36

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 3/16/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Sat Iwasaki
2519 Pulgas Ave.
E. PA. 94303

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	812 gal	3/13	12 P.M.	812 gal	3/16	11:20 AM
Diesel	#2	21½" from top of fill pipe	3/13	12 PM	same	3/16	11:20 AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 2/24/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Sat Iwasaki
2519 Pulgas Ave.
E.P.A. 94303

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	881 gal	2/20	10AM	881	2/24	2:45 PM
Diesel	#2	21½" from fill Cap	2/20	10AM	21½" from fill Cap	2/24	2:45 PM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 1/13/87

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Sat Iwasaki Nsy.
2519 Pulgas Ave.
E. P.A.

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded	#1	240 gal	1/9/87	3:00 pm	240 gal	1/13/87	10:15 AM
Diesel	#2	21½" from top of filler cap	1/9/87	3:10 pm	SAME	1/13/87	10:16 AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 11/24/86

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:

S. Iwasaki
2519 Pulgas Ave.
E. Palo Alto

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	458	11/21/86	2309PM	458	11/24/86	8:25AM
Diesel	#2	21" from top of fill cap	11/21/86	234PM	21" from top of fill cap	11/24/86	8:28AM

HAZARDOUS MATERIAL INVENTORY STATEMENT

Name of Facility Sat Iwasaki Nsy Owner Satoru Iwasaki

Address 2519 Pulgas Ave. Mailing Address Same

City, Zip E. Palo Alto, Calif. 94303 Telephone (415) 323-3787

The information submitted on the form below is true and correct to the best of my knowledge. Any changes in hazardous materials at the stated address will be reported to the Department of Health Service within twentyfour (24) hours.

Submitted by Sat Iwasaki Date 10/20/86

THIS FORM MUST BE SUBMITTED MONTHLY FOR EACH UNDERGROUND AGRICULTURAL TANK!

From:
Sat Iwasaki Nsy
2519 Pulgas Ave.
E. Palo Alto, Cal.

San Mateo County Health Department
590 Hamilton Street
Redwood City, CA 94063

ATTN: J. Henley

OCT 23 11 02 AM '86
ENVIRONMENTAL HEALTH

Chemical Name or Major Constituents in a Mixture	Tank#	Quanity Lbs. or Gals.	Date	Time	Quanity Lbs. or Gals. Following 48 hr. hold	Date	Time
unleaded gas	#1	600gal	10/17/86	4:15PM	600gal	10/20/86	4:00PM
Diesel	#2	20" from top of fill cap	10/17/86	4:17PM	20" from top of fill cap	10/20/86	4:05PM

DAMES & MOORE
TANK TESTING SERVICE
DATA SHEET

Client : Sat Iwasaki Nursery, Inc. Test Date: 07-09-86
Address: 2519 Pulgas Avenue
East Palo Alto,CA 94303

Contact: Sat Iwasaki (415) 323-3787

TANK DATA **Tank Number: 1**

Operator: Sat Iwasaki Nursery, Inc.
2519 Pulgas Avenue
East Palo Alto, CA 94303

Construction material: steel

Capacity: 10000 gallons.

Type of pump: hand pump/feeds boiler

Product: diesel

Vapor recovery system: none

TANK DIMENSIONS

Diameter: 94 inches.

Top of fill pipe to top of tank: 20 inches.

Length: 333 inches.

Fill Pipe Diameter: 4 inches.

Bottom of tank to top of fill: 114 inches.

MISCELLANEOUS

Date/time system was filled: 7-8-86

Type of product used to fill: diesel

Coefficient of expansion for product: .00045 gal./Deg. F

Depth to groundwater(if known): 5-10 feet

Comments: No water in tank. 1300 gallons were put in yesterday.

Test Conducted By: Kris Franklin

DAMES & MOORE
TANK TESTING SERVICE
TEST REPORT

Operator: Sat Iwasaki Nursery, Inc. Test Date: 07-09-86
Address : 2519 Pulgas Avenue
East Palo Alto, CA 94303

Contact : Sat Iwasaki (415) 323-3787

TEST DATA **Tank Number: 1**

Test No.: 1 Time Start: 11:29

Elevation in Tank: 110.5 inches. Time Finish: 11:51

Product Temperature: 18.9-20.8 C Ambient Temperature: 19

Calibration:

Start: 50 ml 32 lines.
End : 50 ml 35 lines.

Calculation Data:

Time: 13 minutes.
Number of lines: 11

Calculation:

$$\frac{50 \text{ ml cal.}}{33.5 \text{ lines cal.}} \times \frac{11 \text{ lines}}{13 \text{ minutes}} \times 60 = 75.77 \text{ ml/hour.}$$

Results:

Test shows a loss rate of 75.77 ml/hour (0.0200 gal/hour).

Indicated tank condition:

Test No.: 2 Time Start: 2:20

Elevation in Tank: 127 inches. Time Finish: 3:06

Product Temperature: 19.2-20.6 C Ambient Temperature: 20

Calibration:

Start: 50 ml 26 lines.
End : 50 ml 27 lines.

Calculation Data:

Time: 9 minutes.
Number of lines: 14

Calculation:

$$\frac{50 \text{ ml cal.}}{26.5 \text{ lines cal.}} \times \frac{14 \text{ lines}}{9 \text{ minutes}} \times 60 = 176.10 \text{ ml/hour.}$$

Results:

Test shows a loss rate of 176.10 ml/hour (0.0465 gal/hour).

Indicated tank condition:
piping does have a slight leak. No repairs appear necessary at this time.

DAMES & MOORE
TANK TESTING SERVICE
DATA SHEET

Client : Sat Iwasaki Nursery, Inc. Test Date: 07-09-86
Address: 2519 Pulgas Avenue
East Palo Alto,CA 94303

Contact: Sat Iwasaki (415) 323-3787

TANK DATA **Tank Number: 2**

Operator: Sat Iwasaki Nursery, Inc.
2519 Pulgas Avenue
East Palo Alto, CA 94303

Construction material: steel

Capacity: 1000 gallons.

Type of pump: suction

Product: supreme gasoline

Vapor recovery system: none

TANK DIMENSIONS

Diameter: 45.5 inches.

Top of fill pipe to top of tank: 38 inches.

Length: 142 inches.

Fill Pipe Diameter: 2 inches.

Bottom of tank to top of fill: 83.5 inches.

MISCELLANEOUS

Date/time system was filled: 7-8-86

Type of product used to fill: supreme gasoline

Coefficient of expansion for product: .0007 gal./Deg. F

Depth to groundwater(if known): 5-10 feet

Comments: No water in tank.

Test Conducted By: Kris Franklin

DAMES & MOORE
TANK TESTING SERVICE
TEST REPORT

Operator: Sat Iwasaki Nursery, Inc. Test Date: 07-09-86
Address : 2519 Pulgas Avenue
East Palo Alto, CA 94303

Contact : Sat Iwasaki (415) 323-3787

TEST DATA **Tank Number: 2**

Test No.: 1 Time Start: 12:31

Elevation in Tank: 63.5 inches. Time Finish: 12:51

Product Temperature: 20.8 C Ambient Temperature: 22

Calibration:

Start: 50 ml 8 lines.
End : 50 ml 7 lines.

Calculation Data:

Time: 19 minutes.
Number of lines: 3

Calculation:

$$\frac{50 \text{ ml cal.}}{7.5 \text{ lines cal.}} \times \frac{3 \text{ lines}}{19 \text{ minutes}} \times 60 = 63.16 \text{ ml/hour.}$$

Results:

Test shows a loss rate of 63.16 ml/hour (0.0167 gal/hour).

Indicated tank condition:

Test No.: 2 Time Start: 1:17

Elevation in Tank: 84 inches. Time Finish: 1:53

Product Temperature: 21.3 C Ambient Temperature: 22

Calibration:

Start: 10 ml 8 lines.
End : 10 ml 14 lines.

Calculation Data:

Time: 9 minutes.
Number of lines: 21

Calculation:

$$\frac{10 \text{ ml cal.}}{11 \text{ lines cal.}} \times \frac{21 \text{ lines}}{9 \text{ minutes}} \times 60 = 127.27 \text{ ml/hour.}$$

Results:

Test shows a loss rate of 127.27 ml/hour (0.0336 gal/hour).

Indicated tank condition:
piping has a leak of 127ml/hr. No repairs are necessary at this time.

OCT 3 10 55 AM '86
ENVIRONMENTAL
HEALTH

California Floral Council

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Executive Secretary

March 22, 1985

Mr. Eiichi Yoshida
Sunnyside Nurseries, Inc.
P.O. Box 4836
Hayward, Ca. 94540

Dear Eiichi:

As requested, enclosed is a State Water Resources Control Board inter-office memo concerning the agricultural exemption from the city or county permit process for underground tanks used for storing motor vehicle fuel.

State Resources Control Board staff are working on a new brochure explaining the Hazardous Substance Storage regulations and I will forward copies to you once received.

Please call if there are further questions in the meantime.

Sincerely,

Roy

Roy E. Hills

cc: K. Utsunomiya w/enclosure

SAT IWASAKI

185 Berry Street, Suite 3818, San Francisco, California 94107 (415) 543-3790
P.O. Box 447, Encinitas, California 92024 (619) 753-5727

2/7/85

Betty,

A farmer, whose UGT is located on a farm, is exempt from the county or city permit process only if his tank falls in these categories: (from AB 3565 Sher, Section 25280 of the H & S Code)

- o Tank is used to store pesticides for cattle and is subject to the supervision of the agric. commissioner
- ✓ o Tank is located on a farm, stores motor vehicle fuel and fuel is used exclusively to propel vehicles for agric. purposes
- o Tank is used for aviation or motor vehicle fuel located one mile of a farm and used by a licensed pest control officer for agric. purposes
- o Sumps, separators, catch basins, etc. are exempt from the permit process only, but must still register these containers

Otherwise, the UGT is not exempt from the permit process. Please let the farmers and counties know this when they call.

Thank you.

Judy

CalEPA

San Francisco Bay
Regional Water
Quality Control
Board

1101 Webster Street
Suite 500
Oakland, CA 94612
(510) 286-1255
FAX (510) 286-1380

Pete Wilson
Governor

May 8, 1997
FileNo.2178.12(MJ,LOH)
RB File No. 41-0149

Satoru and Emma Iwasaki
2519 Pulgas Avenue
East Palo Alto, CA

Subject: Transmittal of the Closure Letter and Summary
Iwasaki Nursery, 2519 Pulgas Avenue, East Palo Alto, CA

Dear Mr. and Mrs. Iwasaki:

Attached please find the uniform underground storage tank closure letter and the site closure summary form for the subject site.

Please contact Mark Johnson or Logan Hansen of my staff at (510) 286-0305 or (510) 286-6733, respectively, if you have any questions regarding this matter.

Sincerely,

Loretta K. Barsamian
Executive Officer

Stephen I. Morse
Chief, Toxics Division

Enclosure: Closure Letter
Site Closure Summary

cc w/att: Dave Deaner & Mike Harper, SWRCB
Gail Lee, SMCOEH
Diane K. Mims, RWQCB

Cal/EPA

San Francisco Bay
Regional Water
Quality Control
Board

1101 Webster Street
Suite 500
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Pete Wilson
Governor

May 8, 1997
FileNo.2178.12(MJ,LOH)
RB File No. 41-0149

Satoru and Emma Iwasaki
2519 Pulgas Avenue
East Palo Alto, CA 94303

Subject: Closure Letter for Iwasaki Nursery, 2519 Pulgas Avenue, East Palo Alto, CA

Dear Mr. and Mrs. Iwasaki:

This letter confirms the completion of site investigation and remedial action for the underground storage tank(s) formerly located at the above described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquires concerning the former underground storage tank(s) are greatly appreciated.

Based on the information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground tank release is required.

This notice is issued pursuant to a regulation contained in Section 2721(e) of Title 23 of the California Code of Regulations .

Please contact our office if you have any questions regarding this matter.

Sincerely,

for Stephen Morse

Loretta K. Barsamian
Executive Officer

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date: April 17, 1997

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Logan Hansen	Title: Student Intern

II. SITE INFORMATION

Site Facility Name: Iwasaki Nursery		
Site Facility Address: 2519 Pulgas Avenue, East Palo Alto, CA		
RB/SMS Case No.: 41-0149	Local or LOP Case No.:	Priority: 3A1
URF Filing Date:	SWEEPS No.:	

Responsible Parties (include addresses and phone numbers)

Satoru and Emma Iwasaki

2519 Pulgas Avenue

East Palo Alto, CA

Tank No.	Size in Gallons	Contents	Closed In—Place/Removed?	Date
1	1000	Gasoline	Removed	11/4/92
2	2000	Diesel	Removed	1/87
3	10,000	Diesel	Removed	2/94

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Holes in Gasoline UST		
Site characterization complete? Yes	Date Approved By Oversight Agency:	
Monitoring wells installed? No	Number:	Proper screened interval? Yes
Highest GW Depth Below Ground Surface:5ft	Lowest Depth:9ft	Flow Direction: NE
Most Sensitive Current Use: Groundwater is not a potential drinking water source because of high levels of Total Dissolved Soilds		
Most Sensitive Potential Use and Probability of Use		
Are drinking water wells affected? No	Aquifer Name:	
Is surface water affected? No	Nearest/Affected SW Name: SF Bay	
Off-Site Beneficial Use Impacts (Addresses/Locations):		
Report(s) on file? Yes	Where is report(s) filed? S.F.R.W.Q.C.B.	

TREATMENT AND DISPOSAL OF AFFECTED MATERIAL			
Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Tank 1,2	1-1000 gallons, 1-2000 gallons	Removed -Disposed at Erickson, Richmond	11/4/92 1/87
Tank 3	1-10,000 gallons	Removed- Disposed by H&H Shipping Co., SF	2/1/94
Rinsate	1,035 gallons	Recycled by Refineries Service, Patterson	11/92

MAXIMUM DOCUMENTED POLLUTANT CONCENTRATIONS—BEFORE AND AFTER CLEANUP									
POLLUTANT	Soil (ppm)		Water (ppb)		POLLUTANT	Soil (ppm)		Water (ppb)	
	Before	After	Before	After		Before	After	Before	After
TPHg	4400	520	NA	NA	Xylene	NA	5.5	NA	ND
TPHd	NA*	60	NA	13000	Ethylbenzene	NA	9.2	NA	ND
Benzene	NA	0.7	NA	ND*	Oil & Grease				
Toluene	NA	0.6	NA	ND	Other				

Comments (Depth of Remediation, etc.):

* ND= Non-detect NA= Not analyzed N/A= Not applicable

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? Yes

Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? Yes

Does corrective action protect public health for current land use? Yes

Site Management Requirements:

Monitoring Wells Decommissioned: 0	Number Decommissioned:	Number Retained:

List Enforcement Actions Taken: None taken

List Enforcement Actions Rescinded: None rescinded

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	
UST Removal Report, ICES	2/94
Preliminary Site Investigation, ICES	2/94
Site Closure Summary Form, ICES	4/97

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND,

2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

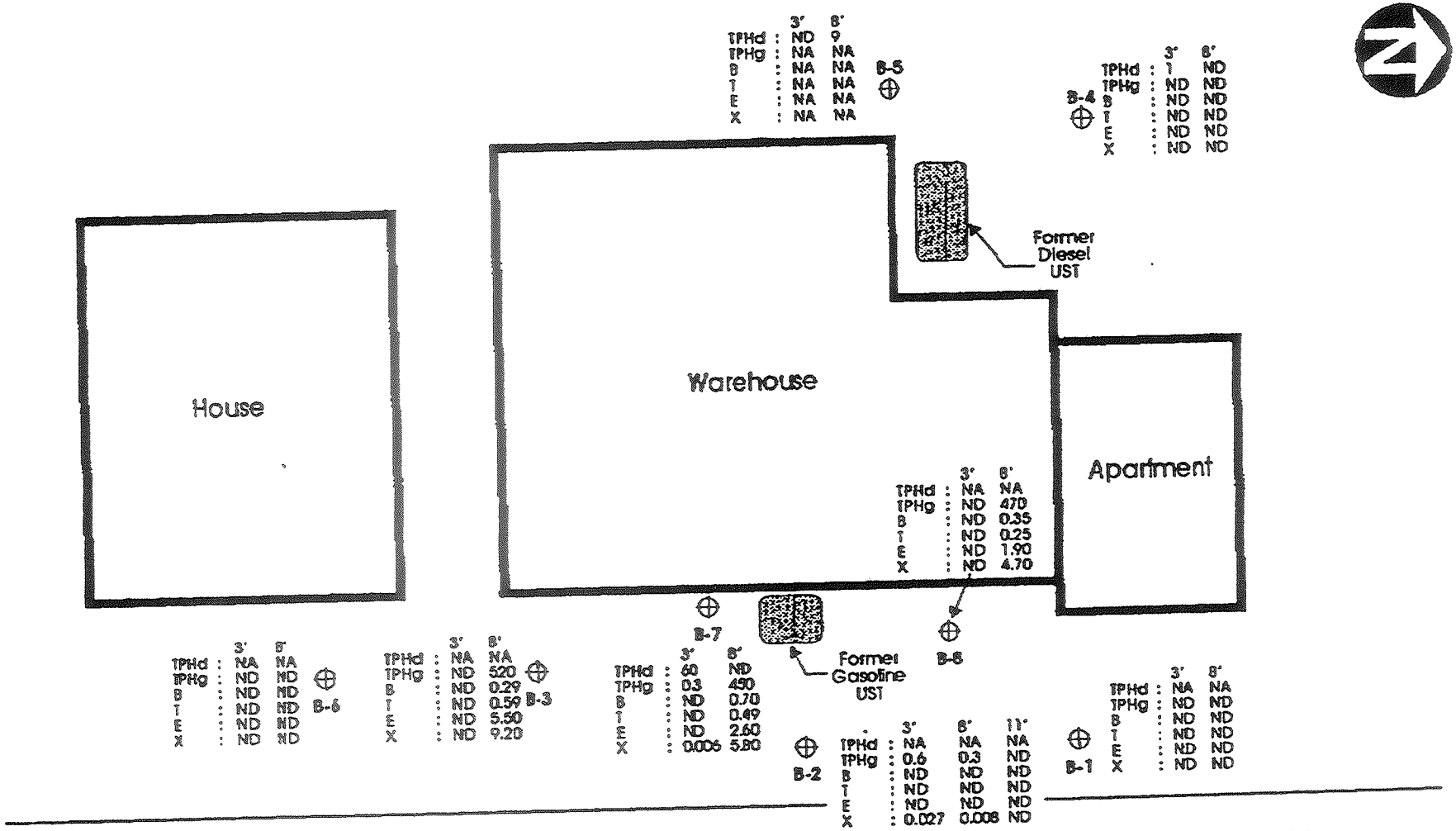
In January of 1987, one 2,000 gallon underground storage tank (UST) used for storing diesel was removed from the subject site. In November of 1992, one 1,000 gallon UST used for storing Gasoline was removed and a third tank, a 10,000 gallon UST used for storing diesel was removed in February of 1994. Innovative and Creative Environmental Solutions (ICES) submitted Remedial Action Plan in March of 1994 detailing the extent of on site hydrocarbon pollution. Seven soil borings were drilled and samples were taken between 3 and 11 feet below ground surface (bgs). Analysis of the samples resulted in the reporting of concentrations of Total Petroleum Hydrocarbons in the form of gasoline (TPHg) from not detected to 520 parts per million (ppm), of TPH in the form of diesel (TPHd) from not detected to 60 ppm, and Benzene concentrations from not detected to 0.7 ppm. One grab groundwater sample was taken from the bottom of the diesel tank pit in 1994. Analysis of this sample resulted in the reporting of TPHd in groundwater at 13,000 parts per billion (ppb). No Benzene, Toluene, Ethyl benzene, or Xylenes were detected. Because of the site's proximity to San Francisco Bay, high levels of Total Dissolved Soilds and since groundwater is not a potential drinking water source, Board staff feel that beneficial uses of groundwater as outlined in the Basin Plan are not compromised.

Conclusion

Based upon available information and in consideration of the new draft Board fuel policy related to petroleum clean-up, we now feel that adequate information has been submitted to consider this case closed and that no further action is necessary for the fuel pollution at the subject site.

Attachment: Site Map

This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.



	B-5 3'	B-5 8'
TPHd	ND	9
TPHg	NA	NA
B	NA	NA
T	NA	NA
E	NA	NA
X	NA	NA

	B-4 3'	B-4 8'
TPHd	1	ND
TPHg	ND	ND
B	ND	ND
T	ND	ND
E	ND	ND
X	ND	ND

	B-8 3'	B-8 8'
TPHd	NA	NA
TPHg	ND	470
B	ND	0.35
T	ND	0.25
E	ND	1.90
X	ND	4.70

	B-6 3'	B-6 8'
TPHd	NA	NA
TPHg	ND	ND
B	ND	ND
T	ND	ND
E	ND	ND
X	ND	ND

	B-3 3'	B-3 8'
TPHd	NA	NA
TPHg	ND	520
B	ND	0.29
T	ND	0.59
E	ND	5.50
X	ND	9.20

	B-7 3'	B-7 8'
TPHd	60	ND
TPHg	0.3	490
B	ND	0.70
T	ND	0.49
E	ND	2.60
X	0.006	5.80

	B-2 3'	B-2 8'	B-2 11'
TPHd	NA	NA	NA
TPHg	0.6	0.3	ND
B	ND	ND	ND
T	ND	ND	ND
E	ND	ND	ND
X	0.027	0.008	ND

	B-1 3'	B-1 8'
TPHd	NA	NA
TPHg	ND	ND
B	ND	ND
T	ND	ND
E	ND	ND
X	ND	ND

EXPLANATION:

3' ← (Sample depth)

TPHd : Diesel
TPHg : Gasoline
B : Benzene
T : Toluene
E : Ethylbenzene
X : Xylenes

NA Not Analyzed
ND Not Detected

Concentrations expressed in mg/kg

Not-to-Scale | February 1994

TPH CONCENTRATIONS

Satoru Iwasaki Nursery

Figure 4

Project 2025

May 15, 2006 ICES 5017

Innovative & Creative Environmental Solutions

Mr. Matt Cappiello
Development Manager
Westpark II
2228 Union Street, Penthouse
San Francisco, California 94123

Subject: Supplementary Site Investigation
2519 Pulgas Avenue
East Palo Alto, California

Dear Matt:

Enclosed is the Supplementary Site Investigation Report documenting the soil and groundwater sampling that was conducted by Innovative and Creative Environmental Solutions at 2519 Pulgas Avenue located in East Palo Alto, California.

If you have any questions or comments concerning this report, please call Derek Wong or me.

Sincerely,

Derek Wong for

Peng Leong
Principal Engineer

Enclosure

Tel(510)652-3222
Fax(510)652-3555

P. O. Box 99288
Emeryville, CA
94662-9288

SUPPLEMENTARY SITE INVESTIGATION

2519 PULGAS AVENUE
EAST PALO ALTO, CALIFORNIA

May 15, 2006

ICES 5017

Prepared for:

Mr. Matt Cappiello
Development Manager
Westpark II
2228 Union Street, Penthouse
San Francisco, California 94123

ICE
Innovative & Creative Environmental Solutions

P. O. Box 99288 Emeryville CA 94662-9288
... (510) 652-3222 ...

ICE

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1	Laboratory Analytical Results of Soil Samples
2	Laboratory Analytical Results of Groundwater Samples

LIST OF FIGURES

NUMBER	TITLE
1	Site Location
2	Test Pit Locations

ICE

May 15, 2006 ICES 5017

SUPPLEMENTARY SITE INVESTIGATION

2519 PULGAS AVENUE
EAST PALO ALTO, CALIFORNIA

1.0 INTRODUCTION

This report presents the findings of the Supplementary Site Investigation that was conducted by Innovative and Creative Environmental Solutions (ICES) at 2519 Pulgas Avenue located in East Palo Alto, California. ("the Site"; Figure 1).

The purpose of the investigation was to delineate the vertical extent of detectable concentrations of organochlorine pesticides that were encountered in the soil samples collected from the shallow surficial soil at the Site in February 2006. Additionally, grab groundwater samples were collected to assess the potential presence of organochlorine pesticides in the underlying groundwater at the Site. The California Regional Water Quality Control Board (RWQCB) served as the lead agency for oversight of the supplementary site investigation activities.

2.0 SITE DESCRIPTION

The Site is located on the north side of Bay Road, west of Pulgas Avenue. The Site consists of a flat rectangular parcel covering an area of approximately 5 acres (Figure 2).

Two structures are located at the southeastern portion of the Site. The remaining portions of the Site are vacant and unpaved. A visual inspection of the structures indicated that they are currently used for residential applications. A shed is located north of the abovementioned structures.

3.0 BACKGROUND

The Site was vacant and undeveloped prior to 1947. During the late 1940s through the mid 1990s, a cut-flower nursery occupied the

western and northeastern portions of the Site. The existing residential structures located at the southeastern portion of the Site had been constructed since the late 1940s. The western and northeastern portions of the Site are currently vacant and unpaved.

The Site formerly contained three underground storage tanks (USTs): one 10,000-gallon diesel UST, one 2,000-gallon diesel UST, and one 1,000-gallon gasoline UST. The USTs were removed from the Site between 1987 and 1994. Soil samples were collected from approximately eight test pits at the Site in January 1994. The purpose of the soil sampling was to assess the extent of the residual petroleum hydrocarbon constituents within the general vicinity of the three USTs. A case closure letter for the three USTs was issued by RWQCB in May 1997.

ICES conducted a Phase I Environmental Site Assessment (ESA) in August 2005. Based on the findings of the Phase I ESA, ICES recommended that a preliminary investigation be conducted at the Site.

ICES performed a limited site investigation in February 2006. A total of twenty soil samples were collected from ten test pit locations and analyzed for organochlorine pesticides, arsenic, lead, and mercury. Laboratory analytical results indicated that the samples contained non-detectable to low concentrations of organochlorine pesticides which were generally below the RWQCB's Environmental Screening Level (ESL, where groundwater is a current or potential source of drinking water) for commercial/industrial landuse, with the exception of dieldrin and endrin. The dieldrin contained in all twenty samples exceeded the commercial/industrial ESL of 0.0023 mg/kg. Endrin concentrations contained in five of the twenty samples were above the commercial/industrial ESL of 0.00065 mg/kg. Concentrations of arsenic, lead, and mercury detected in the soil samples were generally within typical background levels and also below their respective commercial/industrial ESLs, with the exception of arsenic. Arsenic concentrations contained in four of the twenty samples exceeded the commercial/industrial ESL of 5.5 mg/kg but were below the upper bound of the background range of 12 mg/kg. Based on the laboratory analytical results, it appeared that the surficial soil within the Site contained elevated concentrations of dieldrin and endrin.

4.0 SUPPLEMENTARY SITE INVESTIGATION ACTIVITIES

ICES collected soil and grab groundwater samples on April 24, 2006. A total of ten soil samples and five grab groundwater samples were collected from five test pit locations (TP-1 through TP-5). The approximate test pit locations are shown in Figure 2. Charlie Touchatt Trucking Company of East Palo Alto, California excavated the test pits using a backhoe.

Soil samples, designated with suffixes "A" and "B" were collected at depths of approximately 3 and 4 feet below the existing ground surface (bgs), respectively. Soil samples were collected by scraping soil that was removed from the sidewalls and brought to the ground surface in the backhoe bucket at the selected depths directly into 4-ounce glass jars. Grab groundwater samples were collected manually from the test pits using a Teflon bailer. The samples were transferred into 1-liter amber glass jars. After being sealed and labeled, the soil and grab groundwater samples were immediately placed in a chilled cooler containing crushed ice for transportation to the laboratory. Proper documentation and field chain-of-custody procedures were followed.

All equipment used during this investigation which might have come into contact with contaminated materials was thoroughly decontaminated before and after each use. This was accomplished by washing with Alconox (a laboratory-grade detergent) and rinsing with deionized or distilled water.

5.0 LABORATORY ANALYSIS

The soil and grab groundwater samples were sent to McCampbell Analytical, Inc. of Pacheco, California, a state-certified laboratory and selectively analyzed for organochlorine pesticides using EPA Method 8081B. The samples were analyzed on a normal turnaround basis.

6.0 INVESTIGATION RESULTS

The field observations and laboratory analytical results are presented below. The laboratory analytical results are summarized in Tables 1 and 2. Laboratory certificates are included in Appendix A.

6.1 Field Observations

The Site was generally underlain by a brown silty clay to a depth of approximately 3 feet bgs followed by a tan silty sand to the total depth of the test pits at a depth of approximately 9 feet bgs. Groundwater was encountered at a depth of approximately 7 to 8 feet bgs.

6.2 Laboratory Analytical Results

Analysis of the soil samples indicated that:

- p,p'-dichloroethylene (DDE) concentrations ranged from less than 0.001 mg/kg (not detected) to 0.0025 mg/kg.
- Dieldrin concentrations ranged from less than 0.001 mg/kg (not detected) to 0.0058 mg/kg.
- The remaining organochlorine pesticides analyzed using EPA Method 8081B were below their respective detection limits.

Analysis of the grab groundwater samples indicated that:

- Chlordane concentrations ranged from less than 5.0 ug/L (not detected) to 2.3 ug/L.
- DDE concentrations ranged from less than 0.050 ug/L (not detected) to 4.0 ug/L.
- p,p'-dichlorodiphenyl trichloroethane (DDT) concentrations ranged from less than 2.5 ug/L (not detected) to 2.4 ug/L.
- Dieldrin concentrations ranged from 5.0 ug/L to 24 ug/L.
- Endrin concentrations ranged from less than 0.50 ug/L (not detected) to 1.1 ug/L.
- The remaining organochlorine pesticides analyzed using EPA Method 8081B were below their respective detection limits.

7.0 DISCUSSION

Laboratory analytical results indicated that the soil samples contained non-detectable concentrations of organochlorine

pesticides with the exception of sample TP-1A. Sample TP-1A contained detectable concentrations of DDE and dieldrin. The detectable DDE contained in sample TP-1A was significantly below the commercial/industrial ESL of 4.0 mg/kg. Dieldrin contained in sample TP-1A was above the commercial/industrial ESL of 0.0023 mg/kg. The deeper sample (TP-1B) collected at test pit TP-1 from a depth of approximately 4 feet bgs contained a non-detectable concentration of dieldrin.

Results of the grab groundwater samples indicated detectable concentrations of chlordane, DDE, dieldrin, and endrin which were generally above their respective ESLs.

Based on the collective results of the site investigations, it appears that:

1. The pesticide-affected soil extends to a depth of approximately 3 to 4 feet bgs over the entire Site; and

2. Groundwater underlying the Site is impacted by chlordane, DDE, DDT, dieldrin, and endrin.

Mr. Mark Johnson of RWQCB reviewed the site investigation results and mentioned that preparation and approval of a Site Mitigation Plan which describes remedial activities to mitigate the pesticide-affected soil will be required prior to the construction of the proposed commercial/industrial development. Remedial alternatives include, but are not limited to, encapsulation and/or offsite disposal of the pesticide-affected soil. In the event encapsulation of the pesticide-affected soil is selected, preparation and implementation of a Risk Management Plan (RMP) will be required. The RMP will present the necessary tasks required to effectively manage the encapsulated pesticide-affected soil. Preparation and recordation of a deed restriction will also be required. The deed restriction will limit the development of the Site to commercial/industrial applications and prevent the use of the underlying groundwater.

8.0 EXCLUSIONS

ICES assumes no responsibility or liability for the reliance hereon or use hereof of information contained in this report by anyone other than the party to whom it is addressed.

The evaluations and recommendations presented in this report are

based on the limited site investigation results available at this time and could be revised if new information necessitating further review of the Site becomes available.

ICE

TABLE 1

LABORATORY ANALYTICAL REUSLTS OF SOIL SAMPLES
2519 Pulgas Avenue
East Palo Alto, California

Sample ID	Depth (feet)	DDE (mg/kg)	Dieldrin (mg/kg)	Organochlorine Pesticides (mg/kg)
TP-1A	3.0	0.0025	0.0058	<0.001-0.05
TP-1B	4.0	<0.001	<0.001	<0.001-0.05
TP-2A	3.0	<0.001	<0.001	<0.001-0.05
TP-2B	4.0	NA	NA	NA
TP-3A	3.0	<0.001	<0.001	<0.001-0.05
TP-3B	4.0	NA	NA	NA
TP-4A	3.0	<0.001	<0.001	<0.001-0.05
TP-4B	4.0	NA	NA	NA
TP-5A	3.0	<0.001	<0.001	<0.001-0.05
TP-5B	4.0	NA	NA	NA
Commercial/Industrial ESL (1)		4.0	0.0023	- - -

Notes:
1. Shallow Soils (<3m bgs), where groundwater is a current or potential source of drinking water.
2. NA = Not Analyzed

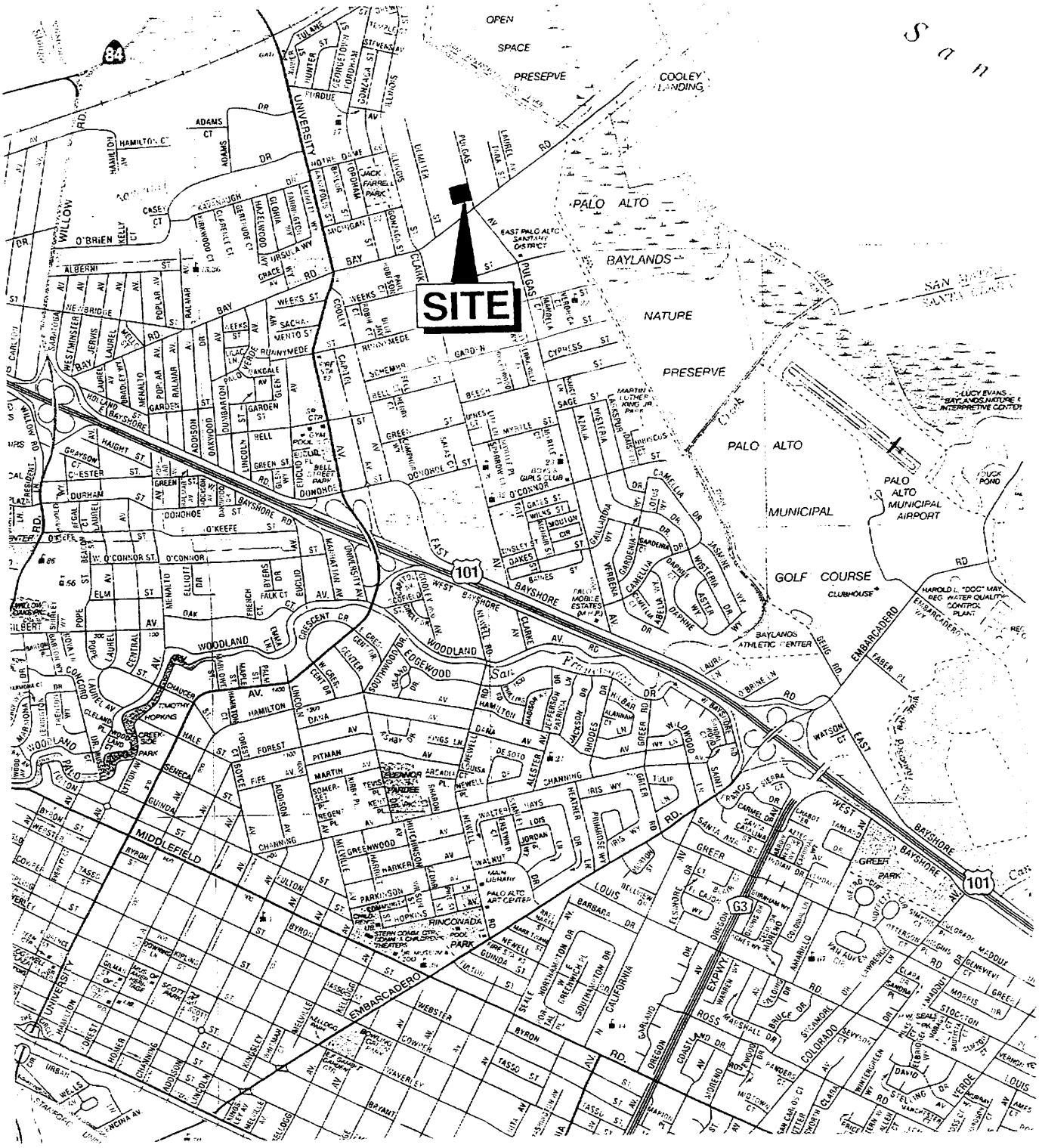
ICE

TABLE 2

LABORATORY ANALYTICAL RESULTS OF GROUNDWATER SAMPLES
2519 Pulgas Avenue
East Palo Alto, California

Sample ID	Chlordane (ug/L)	DDE (ug/L)	DDT (ug/L)	Dieldrin (ug/L)	Endrin (ug/L)	Organochlorine Pesticides (ug/L)
TP-1W	0.66	0.94	0.37	6.4	0.14	<0.025-2.5
TP-2W	1.2	<0.050	0.56	5.0	0.11	<0.025-2.5
TP-3W	<5.0	2.0	<2.5	19	<0.50	<0.25-25.0
TP-4W	2.3	4.0	2.4	24	1.1	<0.050-5.0
TP-5W	2.1	1.5	0.78	10	0.31	<0.050-5.0
ESL (1)	0.004	0.001	0.001	0.0019	0.0023	- - -

Note:
1. Groundwater is a current or potential source of drinking water.



MAP SOURCE : CSAA

Scale: 1" : ± 2200'	May 2006

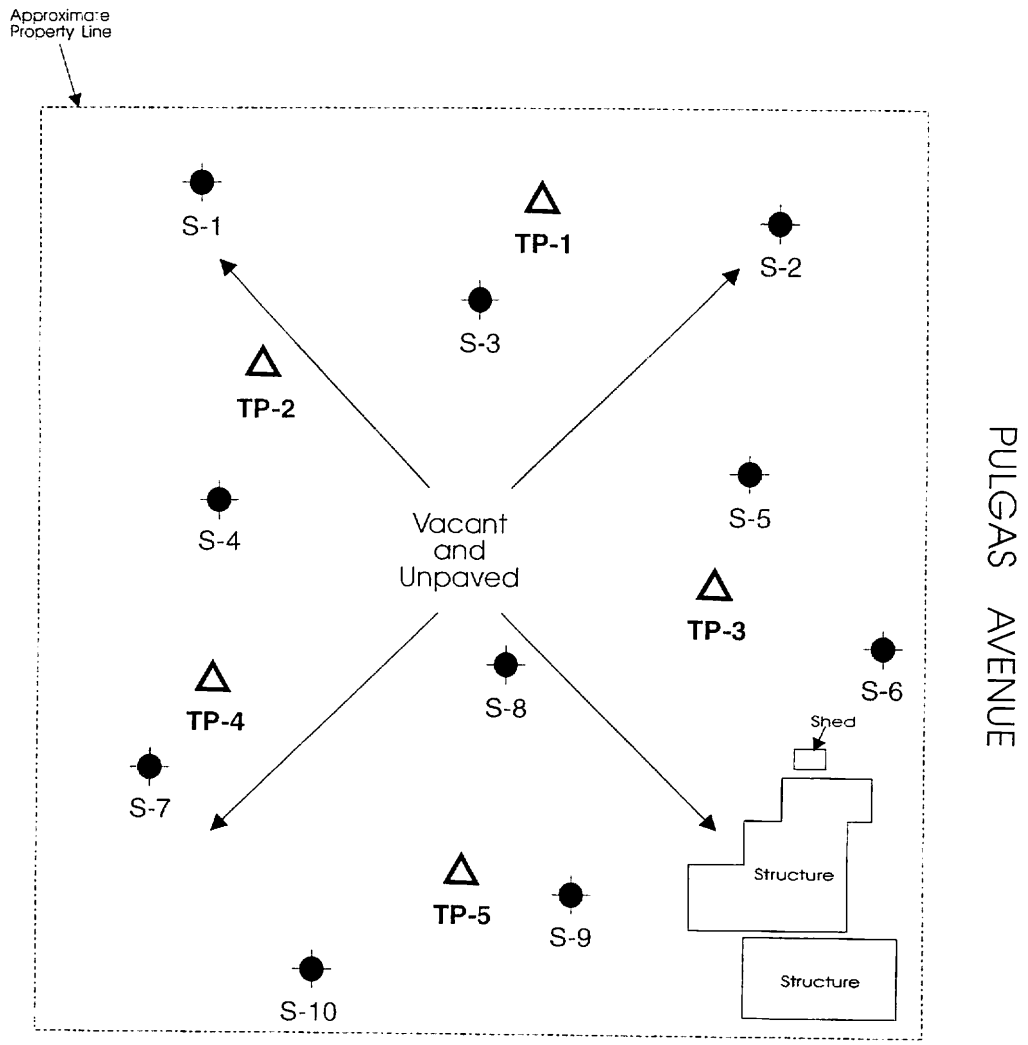
Innovative & Creative Environmental Solutions

SITE LOCATION

2519 Pulgas Avenue
East Palo Alto, California

Figure 1

Project 5017



EXPLANATION:

S-1 Test Pit Location (February 2006)

TP-1 Test Pit Location (April 2006)

Not-to-Scale	May 2006

Innovative & Creative Environmental Solutions

TEST PIT LOCATIONS

2519 Pulgas Avenue
East Palo Alto, California

Figure 2

Project 5017

ICE

APPENDIX A

LABORATORY CERTIFICATES

McCampbell Analytical, Inc.

110 2nd Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
Website: www.mccampbell.com E-mail: main@mccampbell.com

ICES	Client Project ID: #5017	Date Sampled: 04/24/06
		Date Received: 04/24/06
P.O. Box 99288	Client Contact: Peng Leong	Date Extracted 04/24/06
Emeryville, CA 94662	Client P.O.:	Date Analyzed 04/26/06

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3550C Analytical Method: SW8081B Work Order: 0604419

Lab ID	0604419-001A	0604419-003A	0604419-005A	0604419-007A	Reporting Limit for DF =1	
Client ID	TP-1A	TP-2A	TP-3A	TP-4A		
Matrix	S	S	S	S	S	W
DF	1	1	1	1		
Compound	**Concentration**				mg/kg	µg/L
Aldrin	ND	ND	ND	ND	0.001	NA
a-BHC	ND	ND	ND	ND	0.001	NA
b-BHC	ND	ND	ND	ND	0.001	NA
d-BHC	ND	ND	ND	ND	0.001	NA
g-BHC	ND	ND	ND	ND	0.001	NA
Chlordane (Technical)	ND	ND	ND	ND	0.025	NA
a-Chlordane	ND	ND	ND	ND	0.001	NA
g-Chlordane	ND	ND	ND	ND	0.001	NA
p,p-DDD	ND	ND	ND	ND	0.001	NA
p,p-DDE	0.0025	ND	ND	ND	0.001	NA
p,p-DDT	ND	ND	ND	ND	0.001	NA
Dieldrin	0.0058	ND	ND	ND	0.001	NA
Endosulfan I	ND	ND	ND	ND	0.001	NA
Endosulfan II	ND	ND	ND	ND	0.001	NA
Endosulfan sulfate	ND	ND	ND	ND	0.001	NA
Endrin	ND	ND	ND	ND	0.001	NA
Endrin aldehyde	ND	ND	ND	ND	0.001	NA
Heptachlor	ND	ND	ND	ND	0.001	NA
Heptachlor epoxide	ND	ND	ND	ND	0.001	NA
Methoxychlor	ND	ND	ND	ND	0.001	NA
Toxaphene	ND	ND	ND	ND	0.05	NA
Surrogate Recoveries (%)						
%SS:	101	102	99	101		
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

(a) PCB aroclor 1016; (b) PCB aroclor 1221; (c) PCB aroclor 1232; (d) PCB aroclor 1242; (e) PCB aroclor 1248; (f) PCB aroclor 1254; (g) PCB aroclor 1260; (h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

DHS Certification No. 1644

Angela Rydelius, Lab Manager

McCampbell Analytical, Inc.

110 2nd Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
Website: www.mccampbell.com E-mail: main@mccampbell.com

ICES	Client Project ID: #5017	Date Sampled: 04/24/06
		Date Received: 04/24/06
P.O. Box 99288	Client Contact: Peng Leong	Date Extracted 04/24/06
Emeryville, CA 94662	Client P.O.:	Date Analyzed 04/26/06

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3550C Analytical Method: SW8081B Work Order: 0604419

Lab ID	0604419-009A				Reporting Limit for DF =1	
Client ID	TP-5A					
Matrix	S				S	W
DF	1					
Compound	**Concentration**				mg/kg	µg/L
Aldrin	ND				0.001	NA
a-BHC	ND				0.001	NA
b-BHC	ND				0.001	NA
d-BHC	ND				0.001	NA
g-BHC	ND				0.001	NA
Chlordane (Technical)	ND				0.025	NA
a-Chlordane	ND				0.001	NA
g-Chlordane	ND				0.001	NA
p,p-DDD	ND				0.001	NA
p,p-DDE	ND				0.001	NA
p,p-DDT	ND				0.001	NA
Dieldrin	ND				0.001	NA
Endosulfan I	ND				0.001	NA
Endosulfan II	ND				0.001	NA
Endosulfan sulfate	ND				0.001	NA
Endrin	ND				0.001	NA
Endrin aldehyde	ND				0.001	NA
Heptachlor	ND				0.001	NA
Heptachlor epoxide	ND				0.001	NA
Methoxychlor	ND				0.001	NA
Toxaphene	ND				0.05	NA
Surrogate Recoveries (%)						
%SS:	101					
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

(a) PCB aroclor 1016; (b) PCB aroclor 1221; (c) PCB aroclor 1232; (d) PCB aroclor 1242; (e) PCB aroclor 1248; (f) PCB aroclor 1254; (g) PCB aroclor 1260; (h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

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Telephone : 925-798-1620 Fax : 925-798-1622
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ICES	Client Project ID: #5017	Date Sampled: 04/24/06
		Date Received: 04/24/06
P.O. Box 99288	Client Contact: Peng Leong	Date Extracted 04/24/06
Emeryville, CA 94662	Client P.O.:	Date Analyzed 04/27/06-05/01/06

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3510C Analytical Method: SW8081B Work Order: 0604419

Lab ID	0604419-011A	0604419-012A	0604419-013A	0604419-014A	Reporting Limit for DF =1	
Client ID	TP-1W	TP-2W	TP-3W	TP-4W		
Matrix	W	W	W	W	S	W
DF	5	5	50	10		
Compound	**Concentration**				µg/kg	µg/L
Aldrin	ND<0.025	ND<0.025	ND<0.25	ND<0.050	NA	0.005
a-BHC	ND<0.050	ND<0.050	ND<0.50	ND<0.10	NA	0.01
b-BHC	ND<0.025	ND<0.025	ND<0.25	ND<0.050	NA	0.005
d-BHC	ND<0.025	ND<0.025	ND<0.25	ND<0.050	NA	0.005
g-BHC	ND<0.10	ND<0.10	ND<1.0	ND<0.20	NA	0.02
Chlordane (Technical)	0.66	1.2	ND<5.0	2.3	NA	0.1
a-Chlordane	ND<0.25	ND<0.25	ND<2.5	ND<0.50	NA	0.05
g-Chlordane	ND<0.25	ND<0.25	ND<2.5	ND<0.50	NA	0.05
p,p-DDD	ND<0.050	ND<0.050	ND<0.50	ND<0.10	NA	0.01
p,p-DDE	0.94	ND<0.050	2.0	4.0	NA	0.01
p,p-DDT	0.37	0.56	ND<2.5	2.4	NA	0.05
Dieldrin	6.4	5.0	19	24	NA	0.01
Endosulfan I	ND<0.10	ND<0.10	ND<1.0	ND<0.20	NA	0.02
Endosulfan II	ND<0.050	ND<0.050	ND<0.50	ND<0.10	NA	0.01
Endosulfan sulfate	ND<0.25	ND<0.25	ND<2.5	ND<0.50	NA	0.05
Endrin	0.14	0.11	ND<0.50	1.1	NA	0.01
Endrin aldehyde	ND<0.25	ND<0.25	ND<2.5	ND<0.50	NA	0.05
Heptachlor	ND<0.050	ND<0.050	ND<0.50	ND<0.10	NA	0.01
Heptachlor epoxide	ND<0.050	ND<0.050	ND<0.50	ND<0.10	NA	0.01
Methoxychlor	ND<0.50	ND<0.50	ND<5.0	ND<1.0	NA	0.1
Toxaphene	ND<2.5	ND<2.5	ND<25	ND<5.0	NA	0.5
Surrogate Recoveries (%)						
%SS:	94	117	101	113		
Comments	i	i	i	i		

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

(a) PCB aroclor 1016; (b) PCB aroclor 1221; (c) PCB aroclor 1232; (d) PCB aroclor 1242; (e) PCB aroclor 1248; (f) PCB aroclor 1254; (g) PCB aroclor 1260; (h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content/matrix interference; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

DHS Certification No. 1644

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ICES	Client Project ID: #5017	Date Sampled: 04/24/06
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Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3510C Analytical Method: SW8081B Work Order: 0604419

Lab ID	0604419-015A				Reporting Limit for DF =1	
Client ID	TP-5W					
Matrix	W				S	W
DF	10					
Compound	**Concentration**				µg/kg	µg/L
Aldrin	ND<0.050				NA	0.005
a-BHC	ND<0.10				NA	0.01
b-BHC	ND<0.050				NA	0.005
d-BHC	ND<0.050				NA	0.005
g-BHC	ND<0.20				NA	0.02
Chlordane (Technical)	2.1				NA	0.1
a-Chlordane	ND<0.50				NA	0.05
g-Chlordane	ND<0.50				NA	0.05
p,p-DDD	ND<0.10				NA	0.01
p,p-DDE	1.5				NA	0.01
p,p-DDT	0.78				NA	0.05
Dieldrin	10				NA	0.01
Endosulfan I	ND<0.20				NA	0.02
Endosulfan II	ND<0.10				NA	0.01
Endosulfan sulfate	ND<0.50				NA	0.05
Endrin	0.31				NA	0.01
Endrin aldehyde	ND<0.50				NA	0.05
Heptachlor	ND<0.10				NA	0.01
Heptachlor epoxide	ND<0.10				NA	0.01
Methoxychlor	ND<1.0				NA	0.1
Toxaphene	ND<5.0				NA	0.5
Surrogate Recoveries (%)						
%SS:	119					
Comments	i					

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

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DHS Certification No. 1644

Angela Rydelius, Lab Manager

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QC SUMMARY REPORT FOR SW8081B

W.O. Sample Matrix: Soil QC Matrix: Soil WorkOrder: 0604419

EPA Method: SW8081B **Extraction: SW3550C** **BatchID: 21391** **Spiked Sample ID: 0604399-014A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)	
	mg/kg	mg/kg	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	LCS / LCSD
Aldrin	ND	0.010	118	118	0	117	117	0	70 - 130	70 - 130
g-BHC	ND	0.010	88.7	88.9	0.216	87.8	87.8	0	70 - 130	70 - 130
p,p-DDT	ND	0.025	88.9	89.4	0.496	82.1	81.5	0.786	70 - 130	70 - 130
Dieldrin	ND	0.025	98.9	99.3	0.397	98.2	98.3	0.0893	70 - 130	70 - 130
Endrin	ND	0.025	103	103	0	103	102	0.539	70 - 130	70 - 130
Heptachlor	ND	0.010	101	101	0	100	101	0.451	70 - 130	70 - 130
%SS:	87	0.050	98	97	0.653	98	98	0	70 - 130	70 - 130

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:

NONE

BATCH 21391 SUMMARY

Sample ID	Date Sampled	Date Extracted	Date Analyzed	Sample ID	Date Sampled	Date Extracted	Date Analyzed
0604419-001A	4/24/06	4/24/06	4/26/06 6:49 AM	0604419-003A	4/24/06	4/24/06	4/26/06 7:43 AM
0604419-005A	4/24/06	4/24/06	4/26/06 8:38 AM	0604419-007A	4/24/06	4/24/06	4/26/06 9:32 AM
0604419-009A	4/24/06	4/24/06	4/26/06 10:27 AM				

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

DHS Certification No. 1644

QA/QC Officer

McCampbell Analytical, Inc.

110 2nd Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
Website: www.mccampbell.com E-mail: main@mccampbell.com

QC SUMMARY REPORT FOR SW8081B

W.O. Sample Matrix: Water | QC Matrix: Water | WorkOrder: 0604419

EPA Method: SW8081B | **Extraction: SW3510C** | **BatchID: 21364** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)	
	µg/L	µg/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	LCS / LCSD
Aldrin	N/A	0.50	N/A	N/A	N/A	127	127	0	N/A	70 - 130
g-BHC	N/A	0.50	N/A	N/A	N/A	92.5	92.4	0.0384	N/A	70 - 130
p,p-DDT	N/A	1.25	N/A	N/A	N/A	82.1	82.1	0	N/A	70 - 130
Dieldrin	N/A	1.25	N/A	N/A	N/A	105	106	0.404	N/A	70 - 130
Endrin	N/A	1.25	N/A	N/A	N/A	108	107	0.233	N/A	70 - 130
Heptachlor	N/A	0.50	N/A	N/A	N/A	107	107	0	N/A	70 - 130
%SS:	N/A	2.5	N/A	N/A	N/A	94	95	1.48	N/A	70 - 130

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:

NONE

BATCH 21364 SUMMARY

Sample ID	Date Sampled	Date Extracted	Date Analyzed	Sample ID	Date Sampled	Date Extracted	Date Analyzed
0604419-011A	4/24/06	4/24/06	5/01/06 4:23 PM	0604419-012A	4/24/06	4/24/06	4/27/06 4:07 PM
0604419-013A	4/24/06	4/24/06	5/01/06 5:20 PM	0604419-014A	4/24/06	4/24/06	4/27/06 5:59 PM
0604419-015A	4/24/06	4/24/06	4/27/06 6:55 PM				

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

DHS Certification No. 1644

_____ QA/QC Officer

0604419 ICES

McCAMPBELL ANALYTICAL INC.

110 2nd AVENUE SOUTH, #D7
PACHECO, CA 94553-5560
Telephone: (925) 798-1620 Fax: (925) 798-1622

CHAIN OF CUSTODY RECORD

TURN AROUND TIME ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? ☐ Yes ☐ No

Report To: Peng Leong Bill To: Same
Company: ICES
P.O. Box 99288
Emeryville, CA 94662 E-Mail:
Tele: ( ) 510-652-3222 Fax: ( ) 510-652-3555
Project #: ICES 5017 Project Name:
Project Location: 2519 Pulgas Ave
Sampler Signature: [signature]

SAMPLE ID (Field Point Name)	LOCATION	SAMPLING Date	SAMPLING Time	# Containers	Type Containers	MATRIX Water	MATRIX Soil	MATRIX Air	MATRIX Sludge	MATRIX Other	METHOD PRESERVED Ice	METHOD PRESERVED HCl	METHOD PRESERVED HNO_3	METHOD PRESERVED Other	BTEX & TPH as Gas (602/8020 + 8015)/MTBE	TPH as Diesel (8015)	Total Petroleum Oil & Grease (5520 E&F/B&F)	Total Petroleum Hydrocarbons (418.1)	EPA 601 / 8010	BTEX ONLY (EPA 602 / 8020)	EPA 608 / 8080	EPA 608 / 8080 PCB's ONLY	EPA 624 / 8240 / 8260	EPA 625 / 8270	PAH's / PNA's by EPA 625 / 8270 / 8310	CAM-17 Metals	LUFT 5 Metals	Lead (7240/7421/239.2/6010)	RCI	Other: Hold				Comments
Tp 1A	Tp 1	4-24-06		1			✓				✓										✓													
Tp 1B	Tp 1			1			✓				✓																			✓				
Tp 2A	Tp 2			1			✓				✓										✓													
Tp 2B	Tp 2			1			✓				✓																			✓				
Tp 3A	Tp 3			1			✓				✓										✓													
Tp 3B	Tp 3			1			✓				✓																			✓				
Tp 4A	Tp 4			1			✓				✓										✓													
Tp 4B	Tp 4			1			✓				✓																			✓				
Tp 5A	Tp 5			1			✓				✓										✓													
Tp 5B	Tp 5			1			✓				✓																			✓				

Relinquished By:	Date:	Time:	Received By:
[signature]	4-24-06	5:10	[signature]
[signature]	4/24/06	5:10	Kathleen Owen

ICE/t° ✓
GOOD CONDITION ✓
HEAD SPACE ABSENT ✓
DECHLORINATED IN LAB ____ PERSERVED IN LAB ____

	VOAS	O&G	METALS	OTHER
PRESERVATION				
APPROPRIATE CONTAINERS ✓				

McCAMPBELL ANALYTICAL INC.

110 2nd AVENUE SOUTH, #D7
PACHECO, CA 94553-5560
Telephone: (925) 798-1620 Fax: (925) 798-1622

CHAIN OF CUSTODY RECORD

TURN AROUND TIME ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? ☐ Yes ☐ No

Report To: Peng Leong Bill To: Same
Company: Ices
P.O. Box 99288
Emeryville CA 94662 E-Mail:
Tele: ( ) 510-652-3222 Fax: ( ) 510-652-3555
Project #: Ices 5017 Project Name:
Project Location: 2519 Pulgas Ave
Sampler Signature: [signature]

SAMPLE ID (Field Point Name)	LOCATION	SAMPLING Date	SAMPLING Time	# Containers	Type Containers	MATRIX Water	Soil	Air	Sludge	Other	METHOD PRESERVED Ice	HCl	HNO_3	Other	BTEX & TPH as Gas (602/8020 + 8015)/MTBE	TPH as Diesel (8015)	Total Petroleum Oil & Grease (5520 E&F/B&F)	Total Petroleum Hydrocarbons (418.1)	EPA 601 / 8010	BTEX ONLY (EPA 602 / 8020)	EPA 608 / 8080	EPA 608 / 8080 PCB's ONLY	EPA 624 / 8240 / 8260	EPA 625 / 8270	PAH's / PNA's by EPA 625 / 8270 / 8310	CAM-17 Metals	LUFT 5 Metals	Lead (7240/7421/239.2/6010)	RCI	Other	Comments
30 Tp-1W	Tp-1	4-24-05		1		✓					✓										✓										
15 Tp-2W	Tp-2	↓		1		✓					✓										✓										
29 Tp 3W	Tp 3			1		✓					✓										✓										
09 Tp-4W	Tp-4			1		✓					✓										✓										
90 Tp-5W	Tp-5			1		✓					✓										✓										

Relinquished By:	Date:	Time:	Received By:
[signature]	4-24-05		[signature]
[signature]	4/24/05	340	Kathleen Owen

ICE/t° ✓
GOOD CONDITION ✓
HEAD SPACE ABSENT ✓
DECHLORINATED IN LAB ____ PERSERVED IN LAB ____

	VOAS	O&G	METALS	OTHER
PRESERVATION				
APPROPRIATE CONTAINERS ✓				

McCampbell Analytical, Inc.

110 2nd Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
Website: www.mccampbell.com E-mail: main@mccampbell.com

ICES	Client Project ID: #5017	Date Sampled: 04/24/06
		Date Received: 04/24/06
P.O. Box 99288	Client Contact: Peng Leong	Date Extracted: 05/02/06
Emeryville, CA 94662	Client P.O.:	Date Analyzed 05/02/06

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3550C Analytical Method: SW8081B Work Order: 0604419

					Reporting Limit for DF =1	
Lab ID	0604419-002A					
Client ID	TP-1B					
Matrix	S				S	W
DF	1					
Compound	**Concentration**				mg/kg	µg/L
Aldrin	ND				0.001	NA
a-BHC	ND				0.001	NA
b-BHC	ND				0.001	NA
d-BHC	ND				0.001	NA
g-BHC	ND				0.001	NA
Chlordane (Technical)	ND				0.025	NA
a-Chlordane	ND				0.001	NA
g-Chlordane	ND				0.001	NA
p,p-DDD	ND				0.001	NA
p,p-DDE	ND				0.001	NA
p,p-DDT	ND				0.001	NA
Dieldrin	ND				0.001	NA
Endosulfan I	ND				0.001	NA
Endosulfan II	ND				0.001	NA
Endosulfan sulfate	ND				0.001	NA
Endrin	ND				0.001	NA
Endrin aldehyde	ND				0.001	NA
Heptachlor	ND				0.001	NA
Heptachlor epoxide	ND				0.001	NA
Methoxychlor	ND				0.001	NA
Toxaphene	ND				0.05	NA
Surrogate Recoveries (%)						
%SS:	103					
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak

(a) PCB aroclor 1016, (b) PCB aroclor 1221, (c) PCB aroclor 1232; (d) PCB aroclor 1242; (e) PCB aroclor 1248, (f) PCB aroclor 1254, (g) PCB aroclor 1260, (h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol % sediment, (j) sample diluted due to high organic content; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup, (m) silica-gel (EPA 3630) cleanup, (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

DHS Certification No. 1644

Angela Rydelius, Lab Manager

0604419 ICES

McCAMPBELL ANALYTICAL INC.
110 2nd AVENUE SOUTH, #D7
PACHECO, CA 94553-5560
Telephone: (925) 798-1620 Fax: (925) 798-1622

CHAIN OF CUSTODY RECORD

TURN AROUND TIME ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? ☐ Yes ☐ No

Report To: Peng Leong Bill To: Same
Company: ICES
P.O. Box 99288
Emeryville, CA 94662 E-Mail:
Tele: ( ) 510-652-3222 Fax: ( ) 510-652-3555
Project #: ICES 5017 Project Name:
Project Location: 2519 Pulgas Ave
Sampler Signature: Jerd

SAMPLE ID (Field Point Name)	LOCATION	SAMPLING Date	SAMPLING Time	# Containers	Type Containers	MATRIX Water	MATRIX Soil	MATRIX Air	MATRIX Sludge	MATRIX Other	METHOD PRESERVED Ice	METHOD PRESERVED HCl	METHOD PRESERVED HNO_3	METHOD PRESERVED Other	BTEX & TPH as Gas (602/8020 + 8015)/MTBE	TPH as Diesel (8015)	Total Petroleum Oil & Grease (5520 E&F/B&F)	Total Petroleum Hydrocarbons (418.1)	EPA 601 / 8010	BTEX ONLY (EPA 602 / 8020)	EPA 608 / 8080	EPA 608 / 8080 PCB's ONLY	EPA 624 / 8240 / 8260	EPA 625 / 8270	PAH's / PNA's by EPA 625 / 8270 / 8310	CAM-17 Metals	LUFT 5 Metals	Lead (7240/7421/239.2/6010)	RCI	Other: Hold				Comments
Tp-1A	Tp 1	4-24-06		1			✓				✓										✓													
Tp-1B	Tp-1			1			✓				✓										✓									✓				
Tp-2A	Tp-2			1			✓				✓										✓													
Tp-2B	Tp-2			1			✓				✓																			✓				
Tp-3A	Tp-3			1			✓				✓										✓													
Tp-3B	Tp-3			1			✓				✓																			✓				
Tp-4A	Tp-4			1			✓				✓										✓													
Tp-4B	Tp-4			1			✓				✓																			✓				
Tp-5A	Tp-5			1			✓				✓										✓													
Tp-5B	Tp-5			1			✓				✓																			✓				

Relinquished By:	Date:	Time:	Received By:
Jerd [signature]	4-24-06	5:10	[signature]
[signature]	4/24/06	5:10	Kathleen Owen

ICE/t° ✓
GOOD CONDITION ✓
HEAD SPACE ABSENT ✓
DECHLORINATED IN LAB ____ PERSERVED IN LAB ____

	VOAS	O&G	METALS	OTHER
PRESERVATION				
APPROPRIATE CONTAINERS ✓				

BioTech Restorations, LLC

Final Conclusions On A Bench Study To Determine The Capacity of Select Factor Treatments In Reducing Pesticide Concentrations In Soils Collected From 2519 Pulgas Street in East Pal Alto California

Introduction

Chlorinated pesticides such as dieldrin, toxaphene, DDT and chlordane were extensively used in agriculture for many years until these pesticides were banned in the United States due to their suspected adverse impact on human health and the environment. Studies have since proven that the chemical composition of chlorinated pesticides is such that the indigenous soil bacteria are unable to convert these compounds to more basic organic constituents that the bacteria use as food. Absent the capacity to convert these pesticides to non-toxic constituents, the pesticides remain essentially unaltered over time and a potential hazard to both human health and sensitive environmental receptors.

The purpose the bench study was to determine if BTR's proprietary Factor biotechnology when tested on soils collected form the Pulgas site would degrade the target pesticide sufficiently to support a full scale remediation effort at the Pulgas site. The Bench study data indicates that a split Factor treatment would be successful over a period of 6 to 9 months.

Chlorinated Pesticides and Toxicity

Soil bacteria are the key organisms in the breakdown of organic matter and their populations expand in relation to the availability of organic matter. Due to their widespread distribution and importance in soil, the soil bacteria are essential in the elimination of organic pollutants. Residues of pesticides accumulate in the soil by bonding tightly to the organic component of soil and may be further distributed through mobilization as the chemicals slowly change state over time. The pesticides also bio-accumulate in the tissues of animals in higher trophic levels within the food web. There has been growing concern over the fate of long-lived pesticides on human physiological systems most notably the immune system. Studies suggest that these lipid soluble pesticides bio-accumulate or bio-concentrate in the fatty tissue of people exposed to even low dose concentrations of these persistent pesticides. The presence of xeno-biotic chemicals appears to trigger a specific impairment in the performance of the genes that support immune response function. Endocrine function is adversely affected by chronic exposure to these pesticides and it was this impairment that led to the domestic US ban on the application of any of these pesticides or the presence of the pesticide at sites being developed for residential use or where exposure is considered an unacceptable risk to people or the environment.

Materials and Methods

Soil and Site Description

The former nursery property (Site) consists of approximately 5 acres of vacant land located in East Palo Alto, California. ICES has determined through Phase II Environmental Site Assessments conducted at the Site, elevated concentrations of dieldrin, which ranged from 0.057 milligrams per kilogram (mg/Kg) to 1.6 mg/Kg were detected in surficial soil up to 2 feet in depth. These concentrations exceed the State's mandated California Human Health Screening Level (CHHSL) for residential development established by the California Environmental Protection Agency (Cal EPA) of 0.035 mg/Kg and exceeded the Preliminary Remediation Goal (PRG) for residential development established by the U.S. EPA (2004) of 0.030 mg/Kg. Furthermore, arsenic, lead and mercury were detected at background concentrations within the surficial soil at the Site.

Bench Study Experimental Setup

Soils for the bench study were collected by ICES during the first week of May 2007 and sent under chain of custody to BTR's laboratory in Clemson SC. $30,000 in funding to support the bench study was paid by J&R Associates in San Francisco

The goal of the bench study was two fold. The primary goal was to identify a Factor that would be effective in eliminating residual pesticides (dieldrin) within the surficial soil beneath the subject Site. The second goal was to evaluate the soil geochemistry and identify the nutrients, water moisture, pH and available organics necessary to multiply the indigenous bacteria populations beneath the Site. The bench study also illustrated the efficacy and cost model for a turn-key Factor based site remedy.

Experimental Protocol

BASIC BENCH STUDY: PROTOCOL

Upon receipt of the site's representative soil sample, stones and vegetative debris (roots etc.) were removed and the remaining soil thoroughly mixed. 200g of soil were collected and sent to a certified lab for analysis to obtain a baseline profile of the soil in terms of its chemistry and microbiology.

Sufficient soil for the bench study was then transferred to a stainless steel container and further mixed to ensure homogeneity. Equal quantities of the soil were then weighed into inert glass test chambers and arbitrarily labeled 1 through 6 (or as many chambers as are required for the study). Test chamber number one is designated the control and nothing further was added to this soil.
Various amendments were added to the experimental chambers as deemed necessary from the results of the soil profile analysis to ensure a favorable environment for growth of the indigenous microorganisms. The soil in each experimental chamber was then mixed again.

Different Factors (proprietary information) were added to the experimental chambers and the soil well mixed. Water was then added to the experimental chambers to achieve a moisture content of 18-22%. This moisture rage is a statistical average range for moisture content, actual moisture depends on the site's soil and its moisture content as received... In general the soil should feel moist to the touch, and should hold its shape when squeezed into a ball.
An air space of approximately four inches above the soil was allowed in order to maintain an aerobic atmosphere. All chambers were loosely covered with foil to prevent the surface of the soil from drying out. The chambers were maintained at 25 C throughout the study.

Each week the soil was mixed in the experimental chambers to ensure that aerobic conditions were maintained and water was added when necessary to maintain adequate moisture content. After one week the pH of the soil in each chamber was measured and adjustments made to maintain a pH in the 8-8.5 range. The pH was checked at 4 and 8 weeks.

After 6 weeks, soil samples were sent to a certified lab for a measurement of the target compound(s) content. Typically a State-certified lab in the State in which the project is located is utilized for the analyses. If the results indicate a statistically significant decrease in the target compounds(s) content between zero and 6 weeks and between 6 and 12 weeks the bench study is considered successful. The Factor(s) used in the experimental sample showing the highest percentage of degradation are recommended for the field remediation project.

In certain cases where the degradation is not consistent with previous testing and remediation of the target pesticide, additional tests may be run to determine what other essential ingredients are needed for optimal

microbial activity, and a second round of the Factor(s) may be added. The bench study will then continue for a further 4 weeks (to a total of 12 weeks) or longer until a satisfactory outcome is achieved.
It should be noted that the bench study is designed to serve as a guide to allow BioTech Restorations to select the best possible Factor(s) for degradation of the targeted compounds. The precursor bench study is not expected to reduce targeted compounds to non-detect levels during the term of the bench study. The bench study's primary goal is develop a Factor that will within a *predictable timeframe* achieve a reduction in the target compound(s) in the site's soil that achieve the State's regulatory mandated remediation goals.

Pesticide and Soil Chemistry Measurement

Soil Chemistry

Analysis of the baseline soil chemistry found no indication of any conditions that might prove limiting to the successful outcome of a Factor based remedy.

Parameter	Data on a dry weight basis
Ammonia-N	< 4.5 mg/Kg
Nitrate-N	<11 mg/Kg (< 50 mg/Kg as Nitrate)
Total P	1,300 mg/Kg
Moisture	10.3 %
TOC(Total Organic Carbon)	23,000 mg/Kg
HPC (Heterotrophic Plate Count)	8.9 x 105 / gram
pH	7.41

Pesticide Concentrations During the Bench Study

(Initial data at week zero; method SW8081B analyses performed by McCampbell lab.CA)
May 5, 2007

Sample	DDD mg/Kg	DDE mg/Kg	DDT mg/Kg	Dieldrin mg/Kg
EPA1-0	0.023	0.19	0.064	1.2
EPA2-0	ND	0.13	0.039	0.92
EPA3-0	0.012	0.22	0.073	1.4
EPA4-0	0.035	0.25	0.084	1.4
EPA5-0	0.031	0.21	0.076	1.3
EPA6-0	0.032	0.24	0.079	1.4

(Initial data at 6 weeks; method SW8081B analyses performed by McCampbell lab.CA)
June 6, 2007

Sample	DDD mg/Kg	DDE mg/Kg	DDT mg/Kg	Dieldrin mg/Kg
EPA1-6	0.016	0.16	0.062	1.0
EPA2-6	0.056	0.24	0.036	1.3
EPA3-6	0.095	0.38	0.089	2.0
EPA4-6	0.062	0.20	ND	1.1
EPA5-6	0.071	0.20	ND	1.2
EPA6-6	0.10	0.30	ND	1.4

(Data at 12 weeks; method SW8081B analyses performed by McCampbell lab.CA)
August 6, 2007

Sample	DDD mg/Kg	DDE mg/Kg (% reduction cf to control)	DDT mg/Kg (% reduction cf to control)	Dieldrin mg/Kg (% reduction cf to control)
EPA1-12 (control)	0.022	0.52	0.21	1.8
EPA2-12	0.062	0.24 (54%)	ND (100%)	1.2 (33%)
EPA3-12	0.070	0.23 (56%)	ND (100%)	1.2 (33%)
EPA4-12	0.070	0.22 (58%)	ND (100%)	1.1 (39%)
EPA5-12	0.096	0.28 (46%)	ND (100%)	1.3 (28%)
EPA6-12	0.088	0.26 (50%)	ND (100%)	1.1 (39%)

After 12 weeks of treatment, samples EPA2 through EPA6 show 46-58% reduction in DDE content, 100% reduction in DDT content, and 28-39% reduction in Dieldrin content compared to control, EPA1.
Note: DDD values are higher than control due to the fact that the structure of DDD differs from the structure of DDT by the removal of one chlorine so that as DDT is reduced by the Factor treatment there is an initial increase in DDD content prior to its further breakdown.

Results and Discussions

Of the pesticides detected in the initial baseline analysis dieldrin is the only pesticide that remained above the residential CHHL or PRG of .03 ppm following 12 weeks of treatment. It is the consensus of the remediation team that the rates of dieldrin degradation are consistent with past pesticide remediation projects and that a Factor treatment would achieve the mandated cleanup goals for this site.

At the Borello Project (Morgan Hill 2006) and the Mantegani Project (South San Francisco 2006) dieldrin was among the pesticides of concern. At the Borello sites, a dieldrin level of .4 ppm was reported at the initial analysis while a dieldrin level of .97 ppm was reported at the Mantegani site. The remediation goal of < .03 was achieved at the Borello site following 12 weeks of active treatment however following 24 weeks of treatment at the Mantegani site, dieldrin residues were at .129 ppm.

Development of the Mantegani site for residential use precluded an extension of treatment time on site however; in light if the 87% reduction in dieldrin achieved following the Factor treatment DTSC approved the cleanup and issued a Completion Report for Remedial Action on February 20th, 2007. In their decision to allow the site closure, DTSC cited the following in support of the No Further Action designation. *"The cleanup goal for dieldrin was established at a 95% UCL of .03 mg/kg. Using the Preliminary Endangerment Assessment Guidance Manual's soil risk calculations, a 95% UCL of .129 mg/kg equals an approximate risk of 5×10^{-6}. The original dieldrin cleanup goal of .03 mg/kg equals an approximate soil risk of 1×10^{-6}. Although the calculated risk is above the target of 1×10^{-6}, there is sufficient uncertainty in the risk assessment process to make distinguishing between the target level and the calculated levels unrealistic"*. An additional point of consideration must be raised with respect to the reduction of dieldrin at the Mantegani site. In an attempt to reduce the property owner's costs associated with treatment, BTR consented to allow the owner to apply the soil amendments, the Factor product and to water the site with a minimum of supervision. Periodic checks at the site found that treated soils were not being adequately maintained for moisture or pH. In addition, soils were being turned at irregular intervals ranging from 14 to 30 days which reduced aerobic activity and dieldrin degradation from an absence of moisture and oxygen. While the Mantegani site was closed, the principals of BTR consider the project only a marginal success.

From an operational perspective, the project served to illustrate the critical importance of replicating in the field, the treatment plan developed at bench.

Conclusion

A Factor treatment is an aerobic biological process the success of which is dependant upon close adherence to the treatment parameters identified during the pretreatment bench study. As evidenced in the Mantegani site, a Factor treatment allows for some performance flexibility however where cleanup timelines are an element of the remediation plan, it is essential that the soil amendments and the Factor identified at bench be applied at the rates specified and adequately incorporated to insure distribution throughout the impacted soil zone. Following the Factor application and incorporation, the treated soils must be monitored for moisture and pH and turned every 7 to 10 days to insure that an aerobic condition is maintained. Failure on any level during the course of treatment will not necessarily result in a treatment failure but rather an extension in the time and effort necessary to achieve the target cleanup goals.

Based on the bench study data collected on May 5th, June 6th and August 6th it is clear that the Factor treatment has reduced the target pesticides however dieldrin remains at levels above the remedial goals. This was not an unexpected outcome as dieldrin has proven the more recalcitrant pesticide in both the Borello and Mantegani projects.

The solution and BTR's recommendation is to modify the field treatment to incorporate a second Factor application 12 weeks after the initial application if dieldrin levels have not been reduced by > 75%. BTR will not invoice the client for any additional Factor costs associated with a follow up Factor treatment. Based on current degradation rates, it is projected that cleanup at the Pulgas site will take from 6 to 9 months.

Christopher W. Young

President, Biotech Restorations, LLC

November 14, 2007

APPENDIX C

Regulatory Notifications and Permits

ORDINANCE: 04023

ENVIRONMENTAL HEALTH
SAN MATEO COUNTY

Protecting Our Health and Environment

PERMIT 08- 0192

P/E: 2010 MONITORING WELLS - INSTALLATION/DESTRUCTION

FACILITY:
2519 PULGAS AVE, EAST PALO ALTO

OWNER:
G C TIG TARLTON
955 ALMA ST
PALO ALTO

WP0006668
063131220/230
AMOUNT PAID: 528.00

CONTRACTOR:
ECA

TERMS & CONDITIONS:

CONSTRUCT SOIL BORINGS (5)
CONSULTANT: STELLAR ENV SOLUTIONS
(HENRY PIETROPAOLI)

DENO MILANO

ENVIRONMENTAL HEALTH SPECIALIST

DATE ISSUED: 2/22/2008

EXPIRATION DATE: 6/22/2008

THIS PERMIT IS NONTRANSFERABLE AND MUST BE POSTED ON-SITE IN A CONSPICUOUS PLACE

2008 SUBSURFACE DRILLING PERMIT APPLICATION
ENVIRONMENTAL HEALTH SERVICES DIVISION

SAN MATEO COUNTY HEALTH DEPARTMENT
455 COUNTY CENTER, REDWOOD CITY 94063
VOICE (650)363-4305 FAX (650) 363-7882

Henry
$ PAID 528.00
C.C
Mastercard

SAN MATEO COUNTY ENVIRONMENTAL HEALTH
FEB 13 2008
RECEIVED

ALLOW FIVE (5) WORKING DAYS FOR PROCESSING PERMIT

DRILLING DATE & TIME MUST BE SCHEDULED WITH COUNTY STAFF AT LEAST THREE (3) WORKING DAYS IN ADVANCE

PURPOSE OF APPLICATION: ☐ GROUNDWATER MONITORING WELL INSTALLATION/DESTRUCTION ☐ CONSTRUCT SOIL BORINGS ☐ VAPOR WELL INSTALLATION/DESTRUCTION ☐ PERMIT EXTENSION OF PERMIT #MW
NO. OF WELLS ____ NO. OF BORINGS 5 WELL/BORING NAMES B-1, B-2, B-3, B-4, B-5

PURPOSE OF DRILLING: ☒ ENVIRONMENTAL ☐ GEOTECHNICAL
REQUIRED BY: ☐ COUNTY GROUNDWATER PROTECTION PROGRAM ☐ RWQCB/DTSC/USEPA (Provide approval letter) ☐ OTHER (i.e. voluntary)

Site Name 2519 Pulgas Ave Assessor's Parcel # 063-131-220 and 063-131-230 (one per permit)
Drilling Location Address 2519 Pulgas Ave City E. Palo Alto
To be Constructed in: ☐ Public Property ☒ Private Property ☐ Refuse ☐ Other
Maximum Proposed Depth Wells/Borings 8 feet (feet) Drilling Method direct push, Geoprobe
Boring Diameter 2¼ inch Casing Diameter NA Screen Interval NA
Development Method NA (additional 72 hour staff notification required)
Destruction Method (6 gallons water max per 94 lb cement, up to 5% bentonite): ☐ Pressure grouting (provide well construction logs) ☐ Overdrilling

WELL/BORING OWNER: (WELL/BORING OWNER NAME OR CONTACT NAME SHOULD MATCH SIGNATURE)
Name L.G. Terton Contact Person Same
Address 955 Alma St City, State, ZIP Palo Alto, CA 94301
Telephone 650-330-3600 Email tterton@terton.com
It is my responsibility to notify the County of any known changes in the purpose of this well/boring from that which is indicated on this application. It is my responsibility to notify the County of any known damage to the well, and to maintain the well in good condition. (*Letter signed by well/boring owner/contact person, containing above language and attesting to knowledge of all permit requirements and conditions, may be substituted for signature on permit application.*)
Well/Boring Owner's/Contact Person's Signature L.G. (Terry) Terton Date 2/12/08

PROPERTY OWNER: (NAME AS APPEARS ON ASSESSOR'S ROLES SHOULD MATCH SIGNATURE)
Name WILLSTREET II PARTNERS Contact Person WM ROSSETTI
Address 2229 Union St City, State, ZIP 94123 SF, CA
Telephone 415 623 4991 Email Rossetti@jcas.com
I understand that a well/boring is being installed on my property. I agree to notify the County and Well Owner of any known damage to the well. (*Letter signed by property owner, containing above language, or encroachment permit may be substituted for signature on permit application.*)
Property Owner's Signature WILLSTREET II PARTNERS Date 2-12-08

Drilling Company: ECA Contact Person Tim Tyler
Address: 3011 Twin Palms Dr. C57 Drillers License # 695970
City, State, ZIP Aptos, CA 95003 Telephone/Email 831-662-8128
I certify that the well/boring will be constructed in compliance with the conditions of this permit (see reverse), the San Mateo County Ordinance, and the State Water Well Standards, and that the license listed above is considered current and active by the Contractors State License Board.
Driller's Signature [signature] Date 2/13/08

Consultant Company: Stellar Environmental Sol. Project Manager Henry Pietropaoli
Address: 2198 Sixth St Telephone 510 644-3123
City, State, ZIP Berkeley CA 94710 Email hpietropaoli@stellar-environmental.com
I certify that this application is correct to the best of my knowledge. I certify the well/boring will be constructed/destroyed in compliance with the conditions of this permit (see reverse), the San Mateo County Ordinance, and the State Water Well Standards. I understand that I am responsible for General Conditions "D and E" of this permit. I certify if I indicated the purpose of drilling is geotechnical, then no one will use the boring to collect any samples for environmental analyses. (*Responsible Professional must be a California Professional Geologist or Civil Engineer.*)
Responsible Professional's Name (Please print legibly) Henry Pietropaoli
Responsible Professional's Signature [signature] Date 2/13/08
California Professional Geologist (PG) No. 7651 **or Civil Engineer No.**

Please see additional pages of application for requirements, general permit conditions, instructions, and fees
Revised every January 1

Please call for Visa payment
510-644-3123

 2008 SUBSURFACE DRILLING PERMIT APPLICATION

REQUIREMENTS:

An accurate & correct map of existing and proposed well/boring locations **must** be included with the permit application. The well/boring location map **must** include the following.

1. North arrow, existing & historic site features, wells, approximate property lines and any other pertinent existing & historic features and information.
2. Proposed well/boring locations to scale.

A work plan describing the drilling and construction/destruction methodology, at a minimum, is **required** by County Staff. Upon review of information on this application and the submitted work plan, and subject to approval noted below, a permit will be issued allowing well/boring owner, driller, and responsible professional (consultant) to perform the specified work. The permit is subject to both General and Special Conditions stated below. A copy of the approved Subsurface Drilling Permit **must** be available on site while work related to the permit is being performed. Drilling date and time **must** be scheduled with County staff at least three (3) working days in advance of field work. Drilling may begin at the notified date and time whether County staff is present or not.

GENERAL CONDITIONS:

A. Well and boring construction and destruction under this permit is subject to the Standards for the Construction of Wells in San Mateo County, County Groundwater Protection Program (GPP) Guidelines, Policies & Procedures, the State Water Well Standards, and any instructions by a Health Department representative.

B. Well/Boring Owner, Driller, and Responsible Professional assume responsibility for all activities and uses under the permit, including compliance with Workmen's Compensation Laws, and indemnify, defend and save the County of San Mateo, its' officers, agents and employees, free and harmless from any and all expense, cost, or liability in connection with or resulting from work or stopped-work associated with the permit, including, but not limited to, property damage, personal injury, wrongful death, and loss of income.

C. All borings **must** be properly destroyed (grouted/sealed) within 24 hours of drilling unless special conditions are approved in writing as part of this permit.

D. Analytical results of all soil and groundwater samples collected during the execution of drilling under this permit **must** be submitted to County GPP staff by the Responsible Professional within 60 days of sample collection. If contamination is discovered during drilling, verbal notification to County GPP by the Responsible Professional is **required** within 72 hours of discovery. Proper storage, labeling & disposal of investigation-derived wastes are the responsibility of the consultant unless stated otherwise contractually.

E. In addition to the County copy of the State DWR Form 188, boring logs and well construction details for all borings/wells, signed by a Responsible Professional, **must** be submitted to County GPP by the Responsible Professional within 60 days of drilling/construction/destruction. As-built locations/dimensions **must** be finalized in subsequent report of findings submitted to County GPP by the Responsible Professional within 60 days of drilling/construction/destruction.

F. Permit is valid only for the purpose specified herein. No change in construction procedure, as described on this permit application, in the associated workplan, or in the special conditions below, will be allowed except upon written permission from the County.

G. Permit is valid for one mobilization only and is automatically canceled if not exercised, or if an extension is not applied for and granted by County GPP, within 90 days of the original permit issuance date. Failure to notify staff of cancellation or delay in start time, in a timely manner, may result in additional hourly charges to be invoiced to the consultant by GPP Staff.

H. Wells installed under this permit may not be used for domestic, municipal, commercial, or irrigation water supply.

I. All work plans and reports related to work performed under County oversight **must** conform to County GPP guidelines, Regional Water Quality Control Board guidelines, and State Water Well Standards.

J. Top-of-casing elevation of all wells **must** be surveyed to the nearest 0.01-foot relative to Mean Sea Level (NAVD88) and submitted to County GPP within 60 days of drilling, and to State GeoTracker as appropriate.

K. Latitude and longitude of all wells **must** be surveyed with sub-meter accuracy relative to NAD83 and submitted to County GPP within 60 days of drilling, and to State GeoTracker as appropriate.

L. Violation of any requirement or general or special permit condition may result in an order by GPP staff to cease work under this permit, correct the violation, and potentially re-permit the work as a new mobilization.

SPECIAL CONDITIONS:_____

Approved: [signature] RO#_____ Date: 2/14/08

Revised every January 1

APPENDIX D

Certified Analytical Laboratory Reports and Chain-of-Custody Documentation

McCampbell Analytical, Inc.
"When Quality Counts"

1534 Willow Pass Road, Pittsburg, CA 94565-1701
Web: www.mccampbell.com E-mail: main@mccampbell.com
Telephone: 877-252-9262 Fax: 925-252-9269

Stellar Enviormental Solutions 2198 Sixth St. #201 Berkeley, CA 94710	Client Project ID: #2007-73; Site Investigation	Date Sampled: 02/21/08
		Date Received: 02/21/08
	Client Contact: Richard Makdisi	Date Reported: 02/29/08
	Client P.O.:	Date Completed: 02/29/08

WorkOrder: 0802510

February 29, 2008

Dear Richard:

Enclosed within are:

1) The results of the **16** analyzed samples from your project: **#2007-73; Site Investigation,**
2) A QC report for the above samples,
3) A copy of the chain of custody, and
4) An invoice for analytical services.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits.

If you have any questions or concerns, please feel free to give me a call. Thank you for choosing McCampbell Analytical Laboratories for your analytical needs.

Best regards,

Angela Rydelius
Laboratory Manager
McCampbell Analytical, Inc.

SESB 0802510

Chain of Custody Record

Lab job no. _____
Date _____
Page 1 of 2

Laboratory: McCampbell Analytical Inc
Address: 1534 Willow Pass Road, Pittsburg, CA 94565-1701, 877-252-9262

Method of Shipment: Hand Delivery
Shipment No.: ----------
Airbill No.: ----------
Cooler No.: ----------

Project Owner: Tarlton Properties
Site Address: 2519 Pulgas Ave, East Palo Alto, CA
Project Name: Site Investigation
Project Number: 2007-73

Project Manager: Richard Makdisi
Telephone No.: (510) 644-3123
Fax No.: (510) 644-3859
Samplers: (Signature) [signature]

Analysis Required: EPA 8081B

Field Sample Number	Location/ Depth	Date	Time	Sample Type	Type/Size of Container	Preservation: Cooler	Preservation: Chemical	Filtered	No. of Containers	EPA 8081B	Remarks
B2-2	2-2.5'	2/21/08	0805	soil	acetate sleeve	yes	none	no	1	X	
+30 B2-GW	—		0810	H_2O	1l amber				2	X	
B4-12	1-1.5'		0820	soil	acetate sleeve				1	X	
B4-24	2-2.5'		0822						1	X	
B4-36	3-3.5'		0825						1	X	
+40 B4-GW	—		0850	H_2O	1l amber				2	X	
+10 B6-GW	—		0910	H_2O	1l amber				1	X	
B1-2	2-2.5		0930	soil	acetate sleeve				1	X	received 4/20 sample not included
+15 B1-GW	—		0940	H_2O	1l amber				2	X	
B3-2	2-2.5		1015	soil	acetate sleeve				1	X	
+10 B3-GW	—		1020	H_2O	1l amber				2	X	
B5-2	2-2.5		1050	soil	acetate sleeve				1	X	

Relinquished by:	Date	Received by:	Date	Relinquished by:	Date	Received by:	Date
Signature: [signature]	2/21/08	Signature: [signature]	2/21/08	Signature: [signature]	2/21/08	Signature: [signature]	2/21/08
Printed: Henry Pietropaoli	Time: 1300	Printed:	Time: 1300	Printed:	Time: 300	Printed: meli Valles	Time: 3:00pm
Company: Stellar Environmental		Company: McCampbell		Company:		Company:	

Turnaround Time: Standard Turnaround
Samples on ice

Comments: Filter sample w/ .45μ filter

Relinquished by:	Date	Received by:	Date
Signature:		Signature:	
Printed:	Time:	Printed:	Time:
Company:		Company:	

ICE / t° 34°
GOOD CONDITION ✓ APPROPRIATE ✓
HEAD SPACE ABSENT ___ CONTAINERS ___
DECHLORINATED IN LAB ___ PRESERVED IN LAB ___

PRESERVATION: VOAS | O & G | METALS | OTHER

2000-00-01

sesb 0802510

Chain of Custody Record

Lab job no. _____
Date _____
Page 2 of 2

Laboratory: McCampbell Analytical Inc
Address: 1534 Willow Pass Road, Pittsburg, CA 94565-1701, 877-252-9262

Method of Shipment: Hand Delivery
Shipment No.: ----------
Airbill No.: ----------
Cooler No.: ----------

Project Owner: Tarlton Properties
Site Address: 2519 Pulgas Ave, East Palo Alto, CA
Project Name: Site Investigation
Project Number: 2007-73

Project Manager: Richard Makdisi
Telephone No.: (510) 644-3123
Fax No.: (510) 644-3859
Samplers: (Signature) [signature]

Analysis Required: EPA 8081B

Field Sample Number	Location/ Depth	Date	Time	Sample Type	Type/Size of Container	Preservation: Cooler	Preservation: Chemical	Filtered	No. of Containers	EPA 8081B	Remarks
B7-1	1-1.5	2/21/08	1100	soil	acetate sleeve	yes	none	no	1	X	
B7-2	2-2.5	↓	1105	↓	↓	↓	↓	↓	1	X	
B7-3	3-3.5	↓	1108	↓	↓	↓	↓	↓	1	X	
+10 B7-GW	—	↓	1110	H_2O	1-l amber	↓	↓	↓	2	X	

Relinquished by:	Date	Received by:	Date	Relinquished by:	Date	Received by:	Date
Signature: [signature]	2/21/08	Signature: [signature]	2/21/08	Signature: [signature]	2/21/08	Signature: Meyall	3/21/08
Printed: Henry Pietropaoli	Time: 1300	Printed:	Time: 1500	Printed: Rob Pangel	Time: 300	Printed: Meli Valles	Time: 3:00pm
Company: Stellar Environmental		Company: M Crapkey		Company: M Crapkey		Company: MAI	

Turnaround Time: Standard Turnaround
Samples on ice

Comments: filter sample w/ .45µ filter

Relinquished by:	Date	Received by:	Date
Signature:		Signature:	
Printed:	Time:	Printed:	Time:
Company:		Company:	

2000-00-01

McCampbell Analytical, Inc.
1534 Willow Pass Rd
Pittsburg, CA 94565-1701
(925) 252-9262

CHAIN-OF-CUSTODY RECORD

WorkOrder: 0802510 **ClientCode: SESB**

☐ EDF ☐ Excel ☐ Fax ☑ Email ☐ HardCopy ☐ ThirdParty

Report to:
Richard Makdisi
Stellar Enviormental Solutions
2198 Sixth St. #201
Berkeley, CA 94710

Email: rmakdisi@stellar-environmental.com
TEL: (510) 644-3123 FAX: (510) 644-3859
ProjectNo: #2007-73; Site Investigation
PO:

Bill to:
Accounts Payable
Stellar Enviormental Solutions
2198 Sixth St. #201
Berkeley, CA 94710

Requested TAT: 5 days

Date Received: 02/21/2008
Date Printed: 02/22/2008

Lab ID	Client ID	Matrix	Collection Date	Hold	Requested Tests (See legend below) 1	2	3	4	5	6	7	8	9	10	11	12
0802510-001	B2-2	Soil	2/21/08 8:05:00	☐		A										
0802510-002	B2-GW	Water	2/21/08 8:10:00	☐	A		A									
0802510-003	B4-12	Soil	2/21/08 8:10:00	☐		A										
0802510-004	B4-24	Soil	2/21/08 8:20:00	☐		A										
0802510-005	B4-36	Soil	2/21/08 8:22:00	☐		A										
0802510-006	B4-GW	Water	2/21/08 8:50:00	☐	A		A									
0802510-007	B6-GW	Water	2/21/08 9:10:00	☐	A		A									
0802510-008	B1-2	Soil	2/21/08 9:30:00	☐		A										
0802510-009	B1-GW	Water	2/21/08 9:40:00	☐	A		A									
0802510-010	B3-2	Soil	2/21/08 10:15:00	☐		A										
0802510-011	B3-GW	Water	2/21/08 10:20:00	☐	A		A									
0802510-012	B5-2	Soil	2/21/08 10:50:00	☐		A										
0802510-013	B7-1	Soil	2/21/08 11:00:00	☐		A										
0802510-014	B7-2	Soil	2/21/08 11:05:00	☐		A										
0802510-015	B7-3	Soil	2/21/08 11:08:00	☐		A										

Test Legend:

1	8081_DISS	2	8081_S	3	PRDISSOLVED	4		5	
6		7		8		9		10	
11		12							

Prepared by: Melissa Valles

Comments: missing sample received 2/22/08

NOTE: Samples are discarded 60 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at client expense.

McCampbell Analytical, Inc.
1534 Willow Pass Rd
Pittsburg, CA 94565-1701
(925) 252-9262

CHAIN-OF-CUSTODY RECORD

WorkOrder: 0802510 **ClientCode: SESB**

☐ EDF ☐ Excel ☐ Fax ☑ Email ☐ HardCopy ☐ ThirdParty

Report to:
Richard Makdisi
Stellar Enviormental Solutions
2198 Sixth St. #201
Berkeley, CA 94710

Email: rmakdisi@stellar-environmental.com
TEL: (510) 644-3123 FAX: (510) 644-3859
ProjectNo: #2007-73; Site Investigation
PO:

Bill to:
Accounts Payable
Stellar Enviormental Solutions
2198 Sixth St. #201
Berkeley, CA 94710

Requested TAT: 5 days

Date Received: **02/21/2008**
Date Printed: **02/22/2008**

Lab ID	Client ID	Matrix	Collection Date	Hold	Requested Tests (See legend below) 1	2	3	4	5	6	7	8	9	10	11	12
0802510-016	B7-GW	Water	2/21/08 11:10:00	☐	A		A									

Test Legend:

1	8081_DISS	2	8081_S	3	PRDISSOLVED	4		5	
6		7		8		9		10	
11		12							

Prepared by: Melissa Valles

Comments: missing sample received 2/22/08

NOTE: Samples are discarded 60 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at client expense.

McCampbell Analytical, Inc.
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Telephone: 877-252-9262 Fax: 925-252-9269

Sample Receipt Checklist

Client Name: **Stellar Enviormental Solutions**

Date and Time Received: **2/21/08 3:41:47 PM**

Project Name: **#2007-73; Site Investigation**

Checklist completed and reviewed by: Melissa Valles

WorkOrder N°: **0802510** Matrix Soil/Water

Carrier: Rob Pringle (MAI Courier)

Chain of Custody (COC) Information

Chain of custody present?	Yes ☑	No ☐
Chain of custody signed when relinquished and received?	Yes ☑	No ☐
Chain of custody agrees with sample labels?	Yes ☑	No ☐
Sample IDs noted by Client on COC?	Yes ☑	No ☐
Date and Time of collection noted by Client on COC?	Yes ☑	No ☐
Sampler's name noted on COC?	Yes ☑	No ☐

Sample Receipt Information

Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	NA ☑
Shipping container/cooler in good condition?	Yes ☑	No ☐	
Samples in proper containers/bottles?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	

Sample Preservation and Hold Time (HT) Information

All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature	Cooler Temp: 3.4°C		NA ☐
Water - VOA vials have zero headspace / no bubbles?	Yes ☐	No ☐	No VOA vials submitted ☑
Sample labels checked for correct preservation?	Yes ☑	No ☐	
TTLC Metal - pH acceptable upon receipt (pH<2)?	Yes ☐	No ☐	NA ☑

Client contacted: Date contacted: Contacted by:

Comments:

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Telephone: 877-252-9262 Fax: 925-252-9269

Stellar Environmental Solutions	Client Project ID: #2007-73; Site Investigation	Date Sampled:	02/21/08
2198 Sixth St. #201		Date Received:	02/21/08
	Client Contact: Richard Makdisi	Date Extracted:	02/21/08
Berkeley, CA 94710	Client P.O.:	Date Analyzed:	02/22/08-02/26/08

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3510C Analytical Method: SW8081B Work Order: 0802510

Lab ID	0802510-002A	0802510-006A	0802510-007A	0802510-009A	Reporting Limit for DF =1	
Client ID	B2-GW	B4-GW	B6-GW	B1-GW		
Matrix	W	W	W	W	S	W
DF	1	1	1	1		
Compound	**Concentration**				µg/kg	µg/L
Aldrin	ND	ND	ND	ND	NA	0.005
a-BHC	ND	ND	ND	ND	NA	0.01
b-BHC	ND	ND	ND	ND	NA	0.005
d-BHC	ND	ND	ND	ND	NA	0.005
g-BHC	ND	ND	ND	ND	NA	0.02
Chlordane (Technical)	ND	ND	ND	ND	NA	0.1
a-Chlordane	ND	ND	ND	ND	NA	0.05
g-Chlordane	ND	ND	ND	ND	NA	0.05
p,p-DDD	ND	ND	ND	ND	NA	0.01
p,p-DDE	ND	ND	ND	ND	NA	0.01
p,p-DDT	ND	ND	ND	ND	NA	0.01
Dieldrin	ND	ND	ND	0.061	NA	0.01
Endosulfan I	ND	ND	ND	ND	NA	0.02
Endosulfan II	ND	ND	ND	ND	NA	0.01
Endosulfan sulfate	ND	ND	ND	ND	NA	0.05
Endrin	ND	ND	ND	ND	NA	0.01
Endrin aldehyde	ND	ND	ND	ND	NA	0.01
Heptachlor	ND	ND	ND	ND	NA	0.01
Heptachlor epoxide	ND	ND	ND	ND	NA	0.01
Hexachlorobenzene	ND	ND	ND	ND	NA	0.5
Hexachlorocyclopentadiene	ND	ND	ND	ND	NA	1.0
Methoxychlor	ND	ND	ND	ND	NA	0.1
Toxaphene	ND	ND	ND	ND	NA	0.5
Surrogate Recoveries (%)						
%SS:	99	99	110	100		
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

(h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content/matrix interference; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

DHS ELAP Certification N° 1644

Angela Rydelius, Lab Manager

McCampbell Analytical, Inc.
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1534 Willow Pass Road, Pittsburg, CA 94565-1701
Web: www.mccampbell.com E-mail: main@mccampbell.com
Telephone: 877-252-9262 Fax: 925-252-9269

Stellar Enviormental Solutions	Client Project ID: #2007-73; Site Investigation	Date Sampled:	02/21/08
2198 Sixth St. #201		Date Received:	02/21/08
	Client Contact: Richard Makdisi	Date Extracted:	02/21/08
Berkeley, CA 94710	Client P.O.:	Date Analyzed:	02/22/08-02/23/08

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3510C Analytical Method: SW8081B Work Order: 0802510

Lab ID	0802510-016A				Reporting Limit for DF =1	
Client ID	B7-GW					
Matrix	W				S	W
DF	1					
Compound	**Concentration**				µg/kg	µg/L
Aldrin	ND				NA	0.005
a-BHC	ND				NA	0.01
b-BHC	ND				NA	0.005
d-BHC	ND				NA	0.005
g-BHC	ND				NA	0.02
Chlordane (Technical)	ND				NA	0.1
a-Chlordane	ND				NA	0.05
g-Chlordane	ND				NA	0.05
p,p-DDD	ND				NA	0.01
p,p-DDE	ND				NA	0.01
p,p-DDT	ND				NA	0.01
Dieldrin	ND				NA	0.01
Endosulfan I	ND				NA	0.02
Endosulfan II	ND				NA	0.01
Endosulfan sulfate	ND				NA	0.05
Endrin	ND				NA	0.01
Endrin aldehyde	ND				NA	0.01
Heptachlor	ND				NA	0.01
Heptachlor epoxide	ND				NA	0.01
Hexachlorobenzene	ND				NA	0.5
Hexachlorocyclopentadiene	ND				NA	1.0
Methoxychlor	ND				NA	0.1
Toxaphene	ND				NA	0.5
Surrogate Recoveries (%)						
%SS:	98					
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

(h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content/matrix interference; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

McCampbell Analytical, Inc.
"When Quality Counts"

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Web: www.mccampbell.com E-mail: main@mccampbell.com
Telephone: 877-252-9262 Fax: 925-252-9269

CLIENT: Stellar Environmental Solutions
Client Sample ID: B4-12
Project: #2007-73; Site Investigation
Collection Date: 02/21/08 8:10:00 AM

Work Order: 0802510
Lab ID: 0802510-003A
Batch ID: 33912
Matrix: SOIL

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: **SW3550C** Analytical Method: **SW8081B**

Analytes	Result	Qual	MDL	RL	Units	DF	Date Extracted	Date Analyzed
Aldrin	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
a-BHC	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
b-BHC	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
d-BHC	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
g-BHC	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Chlordane (Technical)	ND		0.10	0.25	mg/kg	10	02/21/08	02/23/08
a-Chlordane	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
g-Chlordane	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
p,p-DDD	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
p,p-DDE	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
p,p-DDT	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Dieldrin	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Endosulfan I	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Endosulfan II	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Endosulfan sulfate	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Endrin	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Endrin aldehyde	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Heptachlor	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Heptachlor epoxide	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Hexachlorobenzene	ND		0.10	0.10	mg/kg	10	02/21/08	02/23/08
Hexachlorocyclopentadiene	ND		0.20	0.20	mg/kg	10	02/21/08	02/23/08
Methoxychlor	ND		0.0020	0.010	mg/kg	10	02/21/08	02/23/08
Toxaphene	ND		0.20	0.50	mg/kg	10	02/21/08	02/23/08
Surrogate Recovery								
%SS:	83		0	70-130	%REC	10	02/21/08	02/23/08

Qualifiers

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
N - See attached Narrative

DHS ELAP Certification N° 1644

_____ Angela Rydelius, Lab Manager

McCampbell Analytical, Inc.
"When Quality Counts"

1534 Willow Pass Road, Pittsburg, CA 94565-1701
Web: www.mccampbell.com E-mail: main@mccampbell.com
Telephone: 877-252-9262 Fax: 925-252-9269

CLIENT:	Stellar Environmental Solutions	**Work Order:**	0802510
Client Sample ID:	B4-36	**Lab ID:**	0802510-005A
Project:	#2007-73; Site Investigation	**Batch ID:**	33912
Collection Date:	02/21/08 8:22:00 AM	**Matrix:**	SOIL

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: **SW3550C** Analytical Method: **SW8081B**

Analytes	Result	Qual	MDL	RL	Units	DF	Date Extracted	Date Analyzed
Aldrin	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
a-BHC	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
b-BHC	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
d-BHC	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
g-BHC	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Chlordane (Technical)	ND		0.010	0.025	mg/kg	1	02/21/08	03/01/08
a-Chlordane	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
g-Chlordane	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
p,p-DDD	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
p,p-DDE	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
p,p-DDT	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Dieldrin	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Endosulfan I	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Endosulfan II	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Endosulfan sulfate	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Endrin	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Endrin aldehyde	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Heptachlor	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Heptachlor epoxide	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Hexachlorobenzene	ND		0.010	0.010	mg/kg	1	02/21/08	03/01/08
Hexachlorocyclopentadiene	ND		0.020	0.020	mg/kg	1	02/21/08	03/01/08
Methoxychlor	ND		0.00020	0.0010	mg/kg	1	02/21/08	03/01/08
Toxaphene	ND		0.020	0.050	mg/kg	1	02/21/08	03/01/08
Surrogate Recovery								
%SS:	90		0	70-130	%REC	1	02/21/08	03/01/08

Qualifiers

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
N - See attached Narrative

DHS ELAP Certification N° 1644

_____ Angela Rydelius, Lab Manager

McCampbell Analytical, Inc.
"When Quality Counts"

1534 Willow Pass Road, Pittsburg, CA 94565-1701
Web: www.mccampbell.com E-mail: main@mccampbell.com
Telephone: 877-252-9262 Fax: 925-252-9269

CLIENT: Stellar Environmental Solutions
Client Sample ID: B1-2
Project: #2007-73; Site Investigation
Collection Date: 02/21/08 9:30:00 AM

Work Order: 0802510
Lab ID: 0802510-008A
Batch ID: 33937
Matrix: SOIL

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: **SW3550C** Analytical Method: **SW8081B**

Analytes	Result	Qual	MDL	RL	Units	DF	Date Extracted	Date Analyzed
Aldrin	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
a-BHC	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
b-BHC	0.0039		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
d-BHC	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
g-BHC	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Chlordane (Technical)	ND		0.020	0.050	mg/kg	2	02/22/08	02/26/08
a-Chlordane	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
g-Chlordane	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
p,p-DDD	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
p,p-DDE	0.011		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
p,p-DDT	0.0016	J	0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Dieldrin	0.062		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Endosulfan I	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Endosulfan II	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Endosulfan sulfate	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Endrin	0.00065	J	0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Endrin aldehyde	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Heptachlor	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Heptachlor epoxide	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Hexachlorobenzene	ND		0.020	0.020	mg/kg	2	02/22/08	02/26/08
Hexachlorocyclopentadiene	ND		0.040	0.040	mg/kg	2	02/22/08	02/26/08
Methoxychlor	ND		0.00040	0.0020	mg/kg	2	02/22/08	02/26/08
Toxaphene	ND		0.040	0.10	mg/kg	2	02/22/08	02/26/08
Surrogate Recovery								
%SS:	89		0	70-130	%REC	2	02/22/08	02/26/08

Qualifiers

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
N - See attached Narrative

DHS ELAP Certification N° 1644

_____ Angela Rydelius, Lab Manager

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Stellar Environmental Solutions	Client Project ID: #2007-73; Site Investigation	Date Sampled:	02/21/08
2198 Sixth St. #201		Date Received:	02/21/08
	Client Contact: Richard Makdisi	Date Extracted:	02/21/08
Berkeley, CA 94710	Client P.O.:	Date Analyzed:	02/23/08-02/26/08

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3550C Analytical Method: SW8081B Work Order: 0802510

Lab ID	0802510-001A	0802510-004A	0802510-010A	0802510-012A	Reporting Limit for DF =1	
Client ID	B2-2	B4-24	B3-2	B5-2		
Matrix	S	S	S	S	S	W
DF	1	1	1	1		
Compound	**Concentration**				mg/kg	µg/L
Aldrin	ND	ND	ND	ND	0.001	NA
a-BHC	ND	ND	ND	ND	0.001	NA
b-BHC	0.0042	ND	0.0047	0.0050	0.001	NA
d-BHC	ND	ND	ND	ND	0.001	NA
g-BHC	ND	ND	ND	ND	0.001	NA
Chlordane (Technical)	ND	ND	ND	ND	0.025	NA
a-Chlordane	ND	ND	ND	ND	0.001	NA
g-Chlordane	ND	ND	ND	ND	0.001	NA
p,p-DDD	ND	ND	ND	ND	0.001	NA
p,p-DDE	ND	ND	0.0042	0.0094	0.001	NA
p,p-DDT	ND	ND	ND	0.0024	0.001	NA
Dieldrin	ND	ND	0.0082	0.055	0.001	NA
Endosulfan I	ND	ND	ND	ND	0.001	NA
Endosulfan II	ND	ND	ND	ND	0.001	NA
Endosulfan sulfate	ND	ND	ND	ND	0.001	NA
Endrin	ND	ND	ND	ND	0.001	NA
Endrin aldehyde	ND	ND	ND	ND	0.001	NA
Heptachlor	ND	ND	ND	ND	0.001	NA
Heptachlor epoxide	ND	ND	ND	ND	0.001	NA
Hexachlorobenzene	ND	ND	ND	ND	0.01	NA
Hexachlorocyclopentadiene	ND	ND	ND	ND	0.02	NA
Methoxychlor	ND	ND	ND	ND	0.001	NA
Toxaphene	ND	ND	ND	ND	0.05	NA
Surrogate Recoveries (%)						
%SS:	98	98	96	96		
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak/sample contains surrogate.

(h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

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Stellar Environmental Solutions	Client Project ID: #2007-73; Site Investigation	Date Sampled:	02/21/08
2198 Sixth St. #201		Date Received:	02/21/08
	Client Contact: Richard Makdisi	Date Extracted:	02/21/08
Berkeley, CA 94710	Client P.O.:	Date Analyzed:	02/23/08-02/26/08

Organochlorine Pesticides by GC-ECD (8080 Basic Target List)*

Extraction Method: SW3550C Analytical Method: SW8081B Work Order: 0802510

Lab ID	0802510-013A	0802510-014A	0802510-015A		Reporting Limit for DF =1	
Client ID	B7-1	B7-2	B7-3			
Matrix	S	S	S		S	W
DF	1	1	1			
Compound	**Concentration**				mg/kg	µg/L
Aldrin	ND	ND	ND		0.001	NA
a-BHC	ND	ND	ND		0.001	NA
b-BHC	ND	ND	ND		0.001	NA
d-BHC	ND	ND	ND		0.001	NA
g-BHC	ND	ND	ND		0.001	NA
Chlordane (Technical)	ND	ND	ND		0.025	NA
a-Chlordane	ND	0.0076	ND		0.001	NA
g-Chlordane	ND	0.0052	ND		0.001	NA
p,p-DDD	ND	ND	ND		0.001	NA
p,p-DDE	0.0013	0.0031	ND		0.001	NA
p,p-DDT	ND	ND	ND		0.001	NA
Dieldrin	0.0017	0.0013	ND		0.001	NA
Endosulfan I	ND	ND	ND		0.001	NA
Endosulfan II	ND	ND	ND		0.001	NA
Endosulfan sulfate	ND	ND	ND		0.001	NA
Endrin	ND	ND	ND		0.001	NA
Endrin aldehyde	ND	ND	ND		0.001	NA
Heptachlor	ND	ND	ND		0.001	NA
Heptachlor epoxide	ND	ND	ND		0.001	NA
Hexachlorobenzene	ND	ND	ND		0.01	NA
Hexachlorocyclopentadiene	ND	ND	ND		0.02	NA
Methoxychlor	ND	ND	ND		0.001	NA
Toxaphene	ND	ND	ND		0.05	NA
Surrogate Recoveries (%)						
%SS:	100	99	97			
Comments						

* water samples in µg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter, product/oil/non-aqueous liquid samples and all TCLP & SPLP extracts are reported in mg/L.

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak/sample contains surrogate.

(h) a lighter than water immiscible sheen/product is present; (i) liquid sample that contains >~1 vol. % sediment; (j) sample diluted due to high organic content; (k) p,p,- is the same as 4,4,-; (l) florisil (EPA 3620) cleanup; (m) silica-gel (EPA 3630) cleanup; (n) elemental sulfur (EPA 3660) cleanup; (o) sulfuric acid permanganate (EPA 3665) cleanup; (r) results are reported on a dry weight basis; (p) see attached narrative.

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QC SUMMARY REPORT FOR SW8081B

W.O. Sample Matrix: Water QC Matrix: Water WorkOrder: 0802510

EPA Method SW8081B **Extraction SW3510C** **BatchID: 33904** **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	µg/L	µg/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD
Aldrin	N/A	0.50	N/A	N/A	N/A	116	116	0	N/A	N/A	70 - 130	30
g-BHC	N/A	0.50	N/A	N/A	N/A	93.3	93.4	0.141	N/A	N/A	70 - 130	30
p,p-DDT	N/A	1.25	N/A	N/A	N/A	96.3	96.8	0.534	N/A	N/A	70 - 130	30
Dieldrin	N/A	1.25	N/A	N/A	N/A	103	103	0	N/A	N/A	70 - 130	30
Endrin	N/A	1.25	N/A	N/A	N/A	102	102	0	N/A	N/A	70 - 130	30
Heptachlor	N/A	0.50	N/A	N/A	N/A	91.3	91.6	0.372	N/A	N/A	70 - 130	30
%SS:	N/A	2.5	N/A	N/A	N/A	125	124	0.617	N/A	N/A	70 - 130	30

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:

NONE

BATCH 33904 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
0802510-002A	02/21/08 8:10 AM	02/21/08	02/22/08 7:04 PM	0802510-006A	02/21/08 8:50 AM	02/21/08	02/22/08 8:01 PM
0802510-007A	02/21/08 9:10 AM	02/21/08	02/26/08 9:01 AM	0802510-009A	02/21/08 9:40 AM	02/21/08	02/22/08 10:51 PM
0802510-011A	02/21/08 10:20 AM	02/21/08	02/22/08 11:47 PM	0802510-016A	02/21/08 11:10 AM	02/21/08	02/23/08 12:44 AM

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

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QC SUMMARY REPORT FOR SW8081B

W.O. Sample Matrix: Soil QC Matrix: Soil WorkOrder 0802510

EPA Method SW8081B **Extraction SW3550C** **BatchID: 33912** **Spiked Sample ID: 0802482-014A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	mg/kg	mg/kg	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD
Aldrin	ND	0.010	108	108	0	116	116	0	70 - 130	30	70 - 130	30
g-BHC	ND	0.010	94	93.9	0.0309	93.6	94	0.389	70 - 130	30	70 - 130	30
p,p-DDT	ND	0.025	91.2	90.8	0.441	95.2	96.7	1.64	70 - 130	30	70 - 130	30
Dieldrin	ND	0.025	104	102	1.40	103	104	0.727	70 - 130	30	70 - 130	30
Endrin	ND	0.025	101	100	0.450	101	103	1.28	70 - 130	30	70 - 130	30
Heptachlor	ND	0.010	86	86.6	0.621	91.1	91.7	0.640	70 - 130	30	70 - 130	30
%SS:	99	0.050	123	123	0	124	125	0.939	70 - 130	30	70 - 130	30

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:

NONE

BATCH 33912 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
0802510-001A	02/21/08 8:05 AM	02/21/08	02/23/08 6:20 AM	0802510-003A	02/21/08 8:10 AM	02/21/08	02/23/08 7:16 AM
0802510-004A	02/21/08 8:20 AM	02/21/08	02/23/08 8:12 AM	0802510-005A	02/21/08 8:22 AM	02/21/08	02/25/08 8:11 AM
0802510-010A	02/21/08 10:15 AM	02/21/08	02/25/08 9:07 AM	0802510-012A	02/21/08 10:50 AM	02/21/08	02/26/08 1:25 AM

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

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QC SUMMARY REPORT FOR SW8081B

W.O. Sample Matrix: Soil QC Matrix: Soil WorkOrder 0802510

EPA Method SW8081B **Extraction SW3550C** **BatchID: 33937** **Spiked Sample ID: 0802510-015A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	mg/kg	mg/kg	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD
Aldrin	ND	0.010	104	114	9.39	116	116	0	70 - 130	30	70 - 130	30
g-BHC	ND	0.010	89.3	93.2	4.36	89.3	89.4	0.0605	70 - 130	30	70 - 130	30
p,p-DDT	ND	0.025	92.3	91.9	0.411	98.1	97.3	0.855	70 - 130	30	70 - 130	30
Dieldrin	ND	0.025	102	100	1.47	103	103	0	70 - 130	30	70 - 130	30
Endrin	ND	0.025	101	99	2.01	103	102	0.817	70 - 130	30	70 - 130	30
Heptachlor	ND	0.010	86.6	88.3	1.94	92.2	92	0.222	70 - 130	30	70 - 130	30
%SS:	97	0.050	126	123	2.46	125	127	1.83	70 - 130	30	70 - 130	30

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:

NONE

BATCH 33937 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
0802510-008A	02/21/08 9:30 AM	02/22/08	02/26/08 3:16 PM	0802510-013A	02/21/08 11:00 AM	02/21/08	02/26/08 2:21 AM
0802510-014A	02/21/08 11:05 AM	02/21/08	02/25/08 12:55 PM	0802510-015A	02/21/08 11:08 AM	02/21/08	02/23/08 1:40 AM

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

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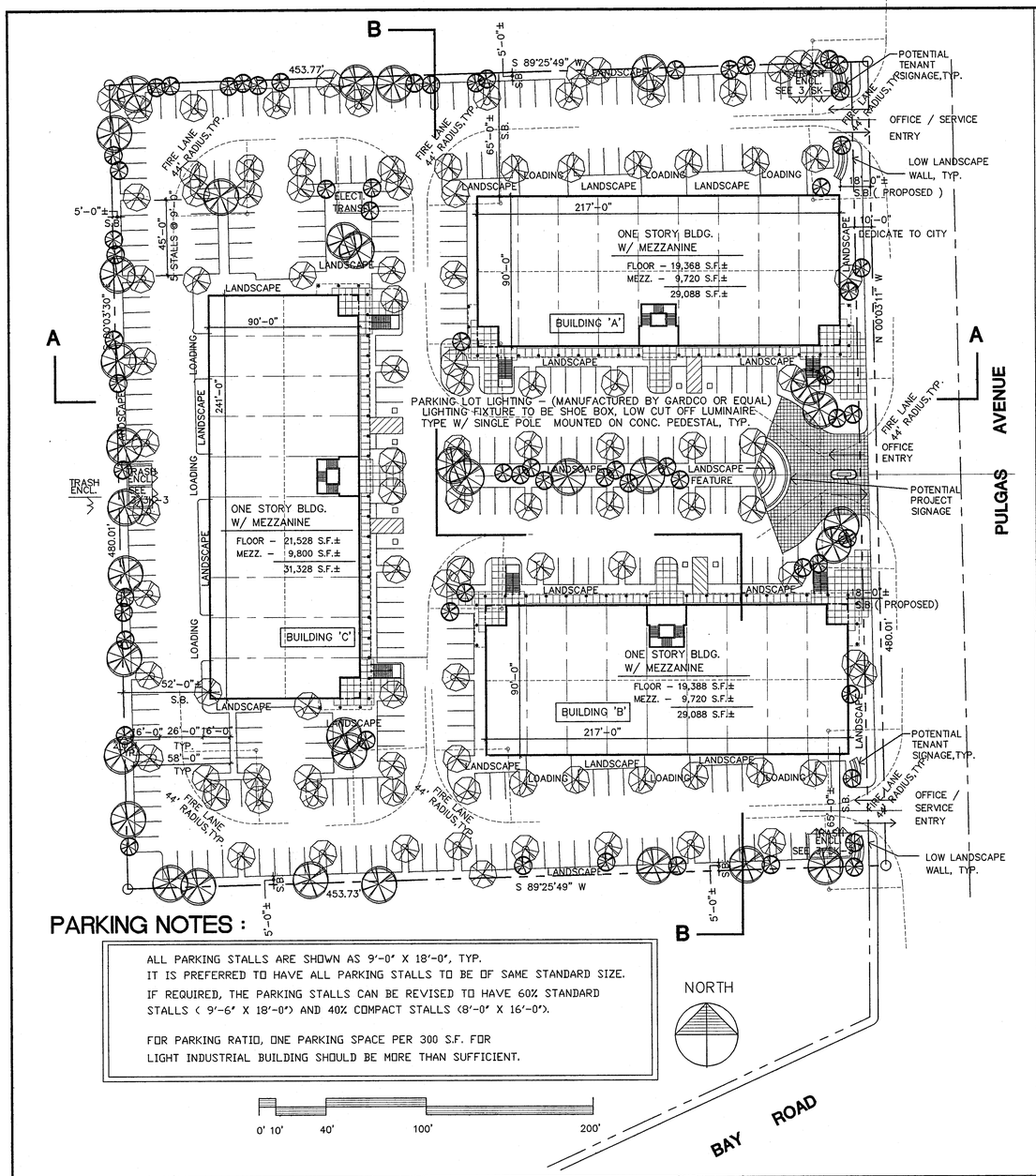
NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

APPENDIX E

Proposed Development Plans



PARKING NOTES :

ALL PARKING STALLS ARE SHOWN AS 9'-0" X 18'-0", TYP.
IT IS PREFERRED TO HAVE ALL PARKING STALLS TO BE OF SAME STANDARD SIZE.
IF REQUIRED, THE PARKING STALLS CAN BE REVISED TO HAVE 60% STANDARD STALLS (9'-6" X 18'-0") AND 40% COMPACT STALLS (8'-0" X 16'-0").

FOR PARKING RATIO, ONE PARKING SPACE PER 300 S.F. FOR LIGHT INDUSTRIAL BUILDING SHOULD BE MORE THAN SUFFICIENT.

5 SITE PLAN

1" = 40'-0"

OWNER	TARLTON PROPERTIES 955 ALMA STREET PALO ALTO, CA 94301 CONTACT : L.C. (TIG) TARLTON	PH - (650) 330-3600 X 101 FAX - (650) 330-3636
ARCHITECT	BOCOOK ARCHITECT, INC. 4041 EL CAMINO WAY, PALO ALTO, CA. 94306 CONTACT : BILL BOCOOK	PH - (650) 856-9510 FAX - (650) 856-8504 EMAIL - BBOCOOK@AOL.COM
CIVIL ENGINEER	KIER & WRIGHT 3350 SCOTT BLVD., BLDG. #22 SANTA CLARA, CA. 95054 CONTACT : BARRY SCHMITT	PH - (408) 727-6665 FAX - (408) 727-5641 EMAIL - bschmitt@kierwright.com
STRUCTUTAL ENGINEER	HOHBACH-LEWIN, INC. 260 SHERIDAN AVENUE, SUITE 150 PALO ALTO, CA 94306 CONTACT : DAN LEWIN	PH - (650) 617-9530 FAX - (650) 617-9532 EMAIL - dlewiw@hohbach-lewin.com
LANDSCAPE	JESSY BERG DESIGN MENLO PARK, CA	

6 PROJECT TEAM

SK-1 PROJECT DATA, PROJECT TEAM, DRAWING INDEX
VICINITY MAP, SITE PLAN, FLOOR PLAN

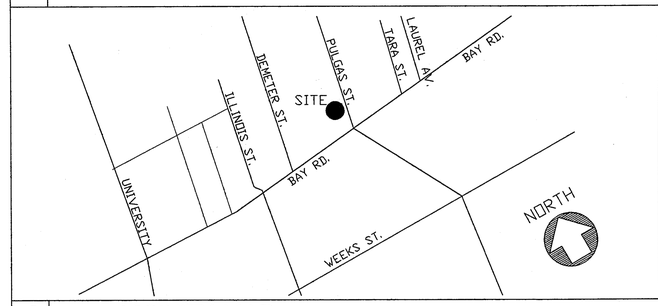
SK-2 ELEVATION, SECTION

SK-3 ENLARGED ELEVATION, WALL SECTIONS
TRASH ENCLOSURE

C-1 PRELIMINARY GRADING PLAN / SURVEY

L-1 LANDSCAPE PLAN

2 DRAWING INDEX



3 VICINITY MAP

N.T.S.

1) ADDRESS : 2519 PULGAS AVENUE,
EAST PALO, CALIFORNIA

2) ZONE : M-1 - LIGHT INDUSTRIAL

3) SITE AREA : 217,800 S.F.± (5.0 ACRES ±)

4) FAR :

	ALLOWABLE	PROPOSED
	RATIO - 1.5 = 326,700 S.F.±	89,504 S.F.±

5) PARKING : REQUIRED : 1/300 S.F. (3.3 STALLS / 1,000 S.F.)
PROPOSED : 299 STALLS

6) PROPOSE : 3 BUILDINGS (ONE STORY)
29,088 S.F.± FOR BUILDING 'A'
29,088 S.F.± FOR BUILDING 'B'
31,328 S.F.± FOR BUILDING 'C'
TOTAL : 89,504 S.F.±

(89,504 S.F. / 300 = 299 PARKING STALLS REQUIRED)

7) SET BACKS :

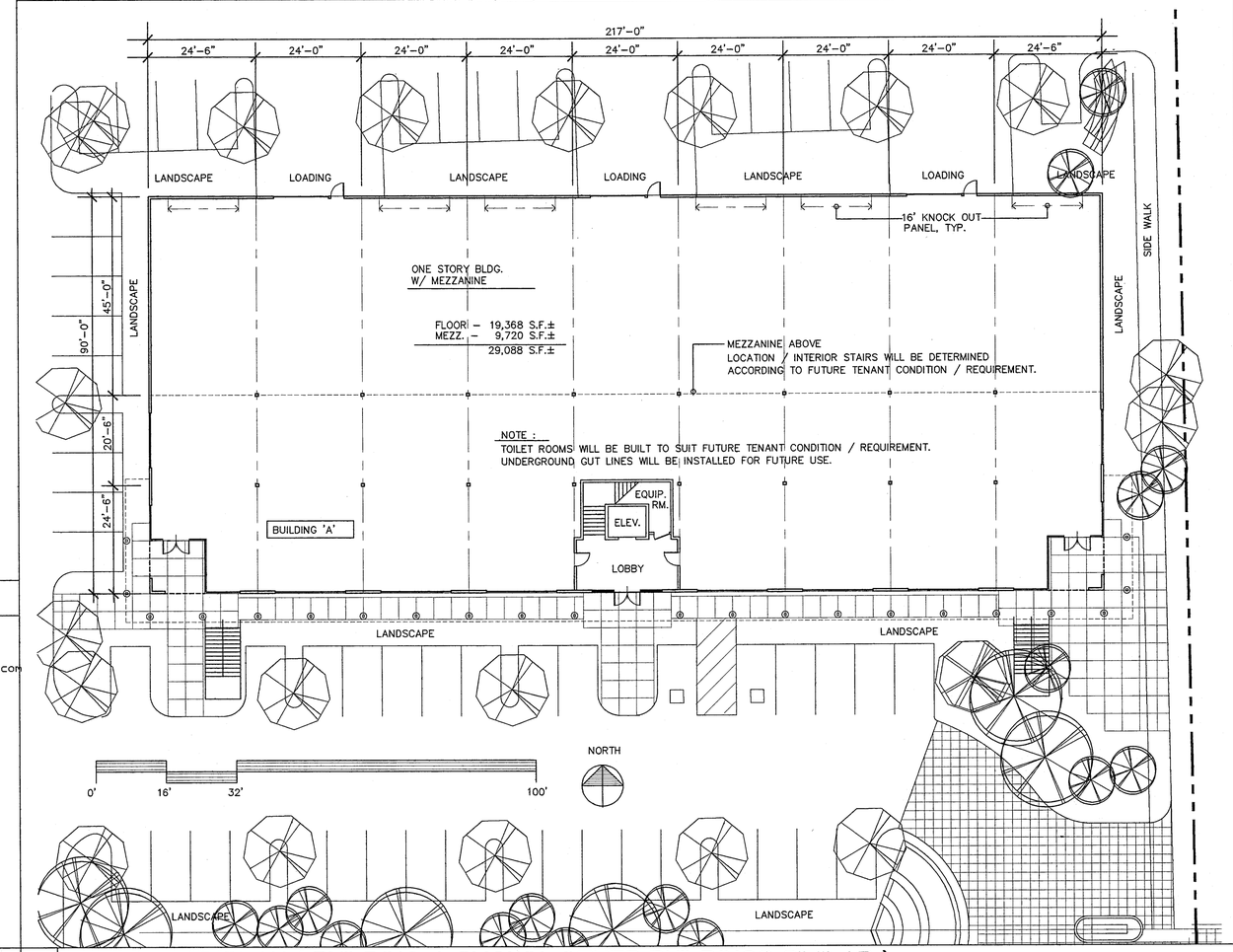
	REQUIRED	PROPOSED
BUILDING - FRONT	8' MIN. / 20' MAXIMUM	8'-0"± (REVISED P.L.)
BUILDING - SIDE	15'	65'-0"±
PARKING LOTS -	5' ALL PROPERTY LINES	5' ALL PROPERTY LINES

8) BUILDING HEIGHT :

ALLOWABLE	PROPOSED
65' (5 STORY) MAXIMUM 20' MINIMUM	25'± (ONE/TWO STORY)

9) FIRE PROTECTION : FULLY SPRINKLER

1 PROJECT DATA



4 FLOOR PLAN (BUILDING A SHOWN, OTHER BUILDINGS SIMILAR)

1" = 16'-0"

REVISIONS

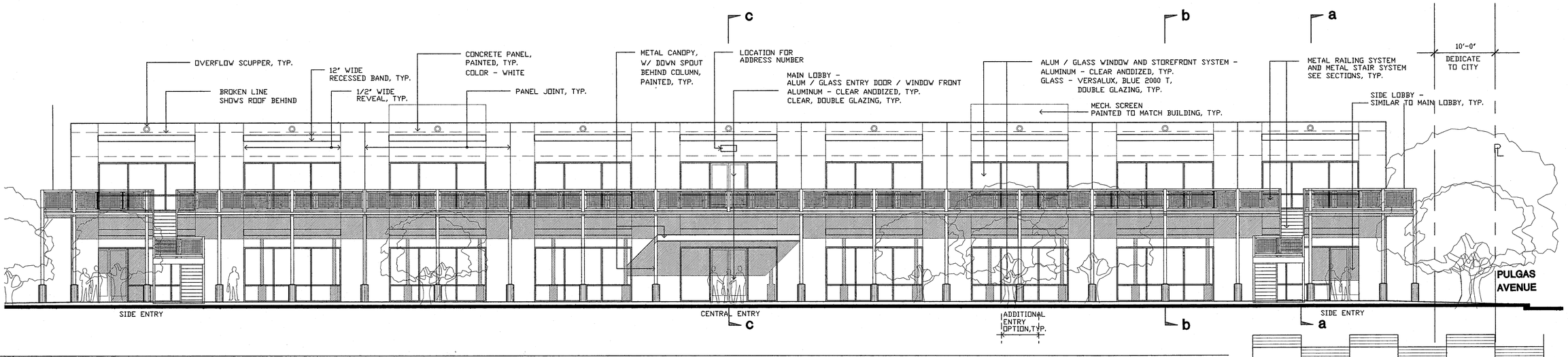
LICENSED ARCHITECT B.H.BOCOOK NO.4573 REN.11-09 STATE OF CALIFORNIA

B H Bocook AIA Architect - 4041 El Camino Way - Palo Alto Ca 94306 - (650) 856 9510

PROPOSED MASTER PLAN - R + D BUILDINGS
2519 PULGAS AVENUE
EAST PALO ALTO, CA.

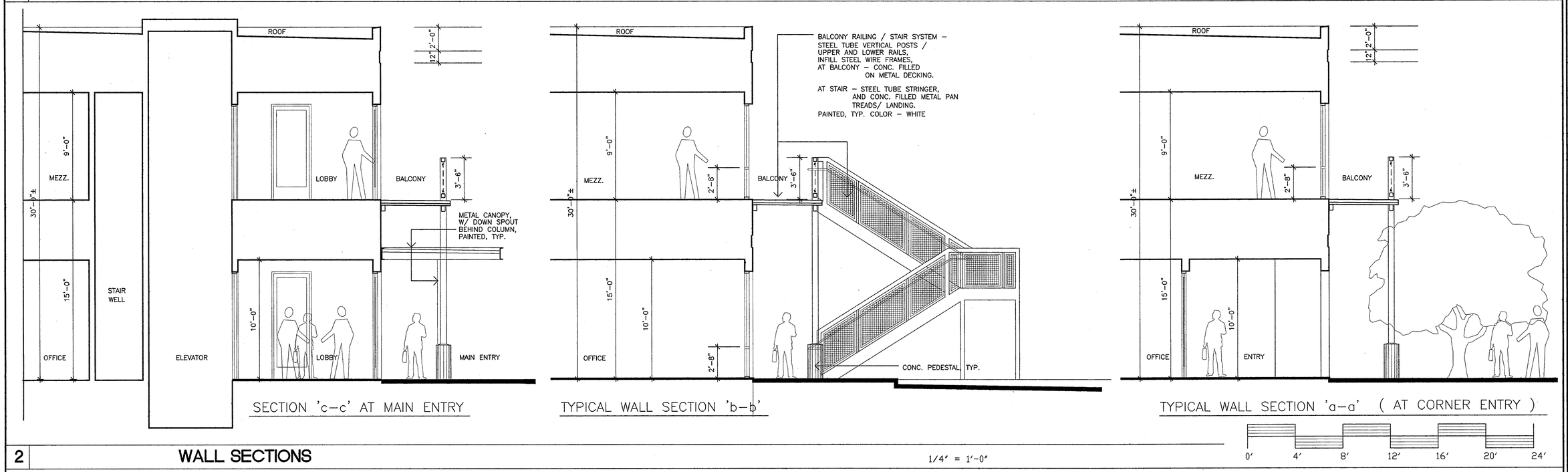
PROJECT DATA, PROJECT TEAM
DRAWING INDEX, VICINITY MAP
SITE PLAN

DATE	FEB.22, 2008
SCALE	AS SHOWN
DRAWN	
JOB	
SHEET	SK-1
CAD FILE	05K-1Y08



1 FRONT ELEVATION OF BUILDING 'A'

1/8" = 1'-0"



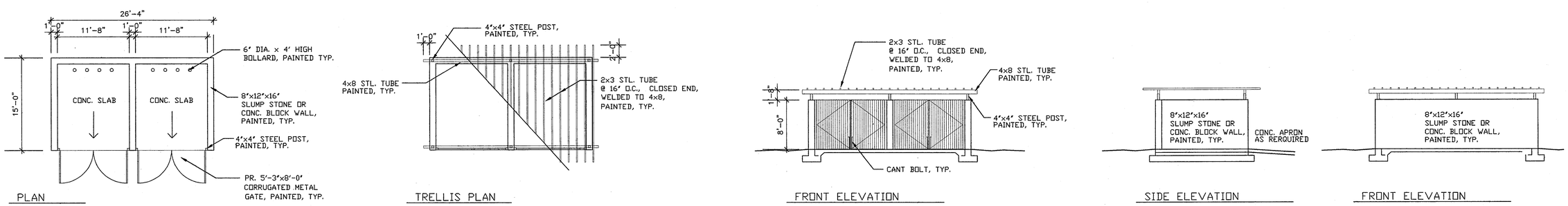
SECTION 'c-c' AT MAIN ENTRY

TYPICAL WALL SECTION 'b-b'

TYPICAL WALL SECTION 'a-a' (AT CORNER ENTRY)

2 WALL SECTIONS

1/4" = 1'-0"



PLAN

TRELLIS PLAN

FRONT ELEVATION

SIDE ELEVATION

FRONT ELEVATION

3 TRASH ENCLOSURE

1/8" = 1'-0"

REVISIONS

LICENSED ARCHITECT B.H.BOCOOK NO.4573 REN.11-09 STATE OF CALIFORNIA

B H Bocook AIA Architect - 4041 El Camino Way - Palo Alto Ca 94306 - (650) 856 9510

PROPOSED MASTER PLAN - R + D BUILDINGS
2519 PULGAS AVENUE
EAST PALO ALTO, CA.

ENLARGED ELEVATION
WALL SECTIONS
TRASH ENCLOSURE

DATE	FEB.22, 2008
SCALE	AS SHOWN
DRAWN	
JOB	
SHEET	SK-3
CAD FILE	DSK-3Y08