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TRANSACTION SCREEN ASSESSMENT

**SACRAMENTO DRILLING COMPANY
ARRAYCON, INC.
1143 BLUMENFELD DRIVE
SACRAMENTO, SACRAMENTO COUNTY,
CALIFORNIA**

JULY 9, 2017

**PREPARED BY:
FARSHAD T. VAKILI, P.E.
PRINCIPLE ENGINEER
273 CANYON FALLS DRIVE
FOLSOM, CALIFORNIA 95630**

**PREPARED FOR:
MR. RICK LAVEZZO
MR. PIETRO SAVIOTTI
1143 BLUMENFLED DRIVE
SACRAMENTO, CALIFORNIA 95815**

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TRANSACTION SCREEN ASSESSMENT OBJECTIVES:

The primary purpose of Transaction Screen Assessment (TSA) Report is to assist Clients with identifying Potential Environmental Concerns (PECs) in connection with the Subject Property. It is based, in part, upon documents, writings, and information owned, possessed, or secured by the Clients. Environmental Transaction Screen Assessments are the most widely accepted limited product and are typically done to meet the requirements of ASTM 1528-06 Standard Practice for Limited Environmental Due Diligence.

The purpose of this practice is to define good commercial and customary practice in the United States of America for conducting a Transaction Screen Assessment for a parcel of commercial real estate where the user wishes to conduct limited environmental due diligence (less than a Phase I Environmental Site Assessment). If the driving force behind the environmental due diligence is a desire to qualify for one of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Landowner Liability Protections (LLPs), this practice should not be applied. Instead, the ASTM Practice E 1527-13 for Environmental Site Assessments – Phase I Environmental Site Assessment Process – shall be used.

The goal of the processes established by this practice is to identify potential environmental concerns. The term Potential Environmental Concerns means the possible presence of any hazardous substances or petroleum products on a property under conditions that indicate the possibility of an existing release, a past release, or a threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The “threat of release” is generally understood to be present when hazardous substances or petroleum products are poorly managed but the release of the contaminants has not yet occurred, and there is an opportunity to take response action to prevent a release of the contaminants. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not PECs.

The Transaction Screen Assessment process consists of asking questions, contained within the transaction screen questionnaire, of owners and occupants of the property; observing site conditions at the property with direction provided by the transaction screen questionnaire; and, to the extent reasonably ascertainable, conducting limited research regarding

certain government records and certain standard historical sources. This TSA Report may not include all environmental conditions which can materially impact the subject property other than those defined as PECs in ASTM E1528-06.

SUBJECT PROPERTY DESCRIPTION AND INSPECTION:

The Subject Property is located at 1143 Blumenfeld Drive in the unincorporated area of the Sacramento County, California (Subject Property); north of Business Highway 80 and west of Arden Way. The Subject Property is located in an industrial area of the Sacramento County, California. There is only one residential neighborhood to the northwest of the Subject Property.

The Subject Property is currently used by Sacramento Drilling Company and Arraycon, Inc. for storage and maintenance of heavy equipment used for drilling and other related works. The free standing metal warehouse and concrete office building are approximately 26,000 square feet on approximately 2.42 acres of land with 20 feet clear ceiling height for the warehouse area. The facility does have 1200 AMPS 277-480 volt 3-phase power, and is fully fenced and landscaped. The Subject Property has six 18'x14' grade level doors with a large yard that accommodate many uses. The Sacramento Assessor Parcel Numbers are 277-0241-016, 277-0241-018 and 277-0241-019.

The land described herein is situated in the State of California, County of Sacramento and is described as follows:

All that portion of Sections 14 and 15 as said Sections are shown and so designated on the "Map of Survey and Subdivision of Rancho Del Paso"; filed in the Office of the Recorder of Sacramento County, California on March 4, 1911, in Book "A" of Surveys, Map No. 94.

Mr. Vakili inspected the Subject Property on July 5, 2017. The Subject Property was occupied by Sacramento Drilling Company and Arraycon, Inc. at the time of the inspection. The free standing concrete office area and the metal warehouse building consisted of warehouse working area, restrooms, inventory rooms, and office areas at Suite 100 and Suite 200.

Mr. Vakili met Rick Lavezzo at the Subject Property Mr. Lavezzo stated that his partner, Mr. Pietro Saviotti and he purchased the property in 2012. Mr. Lavezzo accompanied Mr. Vakili for an inspection of the interior of the office areas and the warehouse. The office areas were remodeled in 2012-2013, while the warehouse area did not change significantly. Mr. Vakili inspected the offices areas for Arraycon and Sacramento Drilling Company at Suite 100 and Suite 200, and did not observe any PEC. Mr. Vakili later inspected interior of the metal warehouse building and observed that the floor had a good concrete foundation. There was no evidence of any spills or discoloration of the concrete inside of the warehouse. Mr. Vakili observed empty aboveground storage tanks, hazardous material containers inside the

warehouse. Mr. Vakili inspected all the hazardous material containers, and did not observe PEC. The Subject Property also had 1200 AMPS 277-480 volt 3-phase power, and was fully fenced and landscaped. Mr. Vakili observed six 18'x14' grade level doors for the warehouse.

Mr. Vakili later inspected the exterior area of the Subject Property. There was storm drains, and equipment wash area outside of the warehouse which were connected to the Publicly Owned Treatment Works (POTW). Mr. Vakili inspected the storm drains and wash rack area, and did not observe concerns. Mr. Vakili also observed a shipping container which contained hazardous waste drums and a 250-gallon used oil tank in the secondary containment. Mr. Vakili inspected the inside of the shipping container, the secondary containment, the hazardous waste drums, and the aboveground used oil; and did not observe any leaks inside the secondary containment areas. Please see Attachment 1 for all the Photographs taken on July 5, 2017.

All the exterior area of the Subject Property was paved with asphalt. The property was also fenced by concrete block walls. No evidence of any discoloration was found in the exterior part of the Subject Property. There were some stained areas in the yard and next to the shipping container. Mr. Vakili recommended that the stained areas to be washed. Mr. Lavezzo stated that he was going to ask the manager to conduct the cleaning for the stained areas.

The possibility of asbestos containing materials and lead based paint was medium in the office area due to the fact that the structure was built in 1960s. Mr. Vakili did not see any insulation in the warehouse. There was a PCB Box in the southeastern corner of the office area. No stain was detected during the inspection of July 5, 2017.

Mr. Vakili completed a Phase I Environmental Site Assessment Report for the Subject Property on June 20, 2012 (Phase I). Phase I recommended a Phase II Environmental Site Assessment (Phase II) to be conducted at the Subject Property for conducting the concrete sampling, pressure washing and soil sampling underneath the vault at the wash rack area. The Phase II was completed on September 20, 2012 which showed non-detect levels underneath the wash rack area.

GEOLOGY, HYDROGEOLOGY, SITE VICINITY:

The Subject Property is located an industrial area of the unincorporated area of Sacramento County, California. The Subject Property is surrounded by Kingston Contracting Inc. (1133 Blumenfeld Drive), C G Rail Signal Wiring, Inc., Blumenfeld Drive and Sears Outlet Store to the south and southeast; Niello Audi (1201 Blumenfeld Drive) to the east; Ellis & Ellis Sign Systems (1111 Joellis Way), and US Food (1025 Joellis Way) to the west and southwest; Cemex Joellis Way Ready Mix Plant (1001 Joellis Way) to the north and northwest; and the railroad to the north. This property is located in the Erikson Industrial Park.

The Subject Property is located in the Sacramento County, California; and within the Great Valley geomorphic province of California. The geology of the great valley is typified by thick sequences of sedimentary deposits of Jurassic through Holocene age. The California Division of Mines of Geology and the United States Geologic Survey have mapped a large portion of the area as being underlain by the lower member of the Quaternary-Aged Riverbank Formation. The Riverbank Formation represents dissected alluvial fans and is generally composed of alluvial gravel, sand and silk derived from the western slopes of the Sierra Nevada Range. The Klamath and Cascade Mountain ranges, on the east by the Sierra Nevada Mountains, and the California Coast Mountain Range bound the Great Valley on the north and to the west. The Subject Property is underlain by layers of sandy silt fine to coarse sand-grained sand with varying amounts of silt and gravel.

Based on "Groundwater Monitoring, Soil Remediation, and Closure Request Report for 1143 Blumenfeld Drive, August 6, 2003, prepared by ENGeo Inc.", ENGeo measured and recorded groundwater depths from the top of well casings for wells on May 21, 2003, and determined that the groundwater depth within the boundaries ranged from 60.04 to 60.22 feet below ground surface. The groundwater elevation contours depict a relatively flat groundwater surface within the property boundaries and the flow direction is toward northeast. The closest water supply well was identified approximately 2,000 feet southwest of the Subject Property.

HISTORICAL AND REGULATORY AGENCY FILE REVIEW:

Historical Aerial Photographs from 1937, 1947, 1952 show that there was Ellis & Ellis Sign building present at the northwest of the Subject Property with apparent lumber activities to the northwest. In the 1961 Historical Aerial Photograph, the office building was constructed at the Subject Property. Historical Aerial Photographs from 1971, 1981 showed that there were the warehouse building constructed at the Subject Property. Historical Aerial Photographs from 1993, 1998, 2005 and 2006 showed the existing structures on the Subject Property while the entire area was constructed with mainly industrial structures.

The Subject property was occupied by Griffin Steel from 1962-1964, and Hudson Steel Fabricators in 1965. Industrial Plumbing occupied the property from 1970 to 1980. In 1983 the Subject Property reached its present configuration, and occupied by Terex Utilities until 2010. Sacramento Drilling Company is currently operating at the Subject Property since 2012.

Mr. Vakili ordered the EDR Radius Map report dated July 6, 2017 for the Subject Property. Please see the EDR Radius Report Map Report in Attachment 2. Based on the review of the regulatory agencies, the Subject Property was on regulatory agencies' database for having underground storage tanks in the past, and being generator of hazardous wastes in the past and at the present time. The Sacramento County Environmental Management Department approved the completion of site investigation and remedial action on July 8, 2004. Please see Attachment 3 for all the No Further Action information by Sacramento County Environmental Management Department.

QUALIFICATION:

Mr. Vakili is a registered professional engineer in the State of California. Mr. Vakili has thirty three years of experience working for regulatory agencies and manufacturing facilities conducting complex environmental assessment, characterization and remediation projects. Mr. Vakili also conducted assessment projects for regulatory agencies preparing Resource Conservation and Recovery Act (RCRA) facility assessments reports for various industries throughout California in compliance with the California Department of Toxic Substances Control (DTSC) and United States Environmental Protection Agency laws and regulations. Mr. Vakili is currently a retired Senior Hazardous Substances Engineer from DTSC dated March 1, 2016. Mr. Vakili has also conducted phase I environmental site assessment projects for residential, commercial as well as industrial properties in California. Please see Attachment 4 for Mr. Vakili's Statement of Qualification and Insurance Liability.

RECOMMENDATION AND CERTIFICATION:

At the request of Mr. Rick Lavezzo; Mr. Vakili performed this TSA Report for the Subject Property. The Subject Property is used by Sacramento Drilling Company and Arraycon, Inc. for storage and maintenance of heavy equipment used for drilling and other related works. The free standing metal warehouse and concrete office building are approximately 26,000 square feet on approximately 2.42 acres of land with 20 feet clear ceiling height inside the warehouse building. The Subject Property currently has 1200 AMPS 277-480 volt 3-phase power, and is fully fenced and landscaped. The Subject Property has also six 18'x14' grade level doors with a large yard that accommodate many uses. The Sacramento Assessor Parcel Numbers are 277-0241-016, 277-0241-018 and 277-0241-019. This TSA assessment of the Subject Property included review of the regulatory agencies files relevant to any releases to the environment, conducting visual site inspection on July 5, 2017, surveillance of the surrounding area and providing the findings in this TSA Report.

This TSA assessment has revealed no evidence of Potential Environmental Contaminations in connection with the Subject Property. This is to certify that based on Mr. Vakili's assessment of the Subject Property, review of all regulatory agencies files and a visual site inspection; Mr. Vakili hereby recommends no further action at this time for the Subject Property.



Farshad Vakili, P.E
Professional Engineer
273 Canyon Falls Drive
Folsom, California 95630



Transaction Screen Assessment Report
1143 Blumenfeld Drive, Sacramento, Sacramento County, California
July 9, 2017

ATTACHMENT 1 PHOTOGRAPHS



Photo 1: Looking inside the office at the names of the two suites



Photo 2: Looking inside the office building



Photo 3: Looking at new empty aboveground storage tanks in the warehouse



Photo 4: Looking inside the warehouse area



Photo 5: Looking at the hazardous materials inside the warehouse



Photo 6: Looking inside shipping container used for hazardous waste area



Photo 7: Looking inside the hazardous waste storage area



Photo 8: Looking west at hazardous waste management area



Photo 9: Looking at the storm drain inside the property



Photo 10: Looking at a storm drain inside the property



Photo 11: Looking at some empty drums and containers in the yard



Photo 12: Looking northwest at the yard area



Photo 13: Looking at gas cylinders and some empty drums in the yard



Photo 14: Looking an empty aboveground tank in the yard area



Photo 15: Looking inside the wash area



Photo 16: Looking at some gasoline containers in the wash area



Photo 17: Looking at another storm drain in the yard area



Photo 18: Looking east at the road connecting the property to Blumenfeld



Photo 19: Looking south at the metal warehouse building



Photo 20: Looking south at the entrance to the office area

Transaction Screen Assessment Report
1143 Blumenfeld Drive, Sacramento, Sacramento County, California
July 9, 2017

ATTACHMENT 2
EDR RADIUS MAP REPORT

Transaction Screen Assessment Report
1143 Blumenfeld Drive, Sacramento, Sacramento County, California
July 9, 2017

ATTACHMENT 3
UNDERGROUND STORAGE TANK INFORMATION



COUNTY OF SACRAMENTO
Environmental Management Department
Mel Knight, Director

Richard Sanchez, Chief
Environmental Health Division
Dennis Green, Chief
Hazardous Materials Division
Cecilia Jensen, Chief
Water Protection Division

July 8, 2004

Mr. William Astle
RR2 Box 84C
Edwards, MO 65326

Malech 1993 Family Trust
20700 Henwood Road
San Jose, CA 95120

SUBJECT: LOCAL OVERSIGHT PROGRAM (LOP) SITE NO. E587
INDUSTRIAL PLUMBING
1143 BLUMENFELD DRIVE, SACRAMENTO, CA

This letter is being addressed to Malech 1993 Family Trust, as well as Mr. William Astle, because, as the current property owner, Malech 1993 Family Trust has been identified as a responsible party (RP) for corrective actions related to the former UST release (California Code of Regulations, Title 23, Division 3, Chapter 16, Article 11, Section 2720). In addition, Malech 1993 Family Trust may also be a RP for corrective actions related to the chlorinated solvent releases.

On November 7, 2003, the above referenced site was presented at a joint meeting with our office's Site Assessment and Mitigation Section and the State's Central Valley Regional Water Quality Control Board (CVRWQCB). The CVRWQCB has concurred with our opinion that the site should be closed with respect to the UST release. Therefore, enclosed is a letter from the Environmental Management Department, together with the Case Closure Summary, indicating that this office requires no further action.

The CVRWQCB, however, has requested that the existing monitoring wells remain in place for potential monitoring of the chlorinated solvent plume (see attached letter). Please be advised that Sacramento County's well ordinance (available for download at <http://www.emd.saccounty.net/pdf/SCC%201217.pdf>) requires that the monitoring wells be "used" at least once a year, and there are significant penalties for allowing a well to remain in a state of disuse for more than a year. You should note also that, per the ordinance, the responsibility of maintaining use of the wells extends to the property owner.

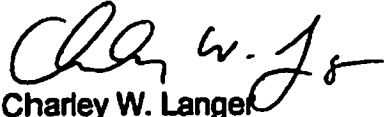
We understand it is the desire of the primary/active RP (Mr. William Astle) to destroy the existing monitoring wells. It has long been the opinion of Mr. Astle's consultant (ENGE0) that the PCE is a "regional" issue, and we have at least one reasonably proximal site that would seem to support this opinion. In May 2004, we informed the CVRWQCB that it is our desire that they either: (a) direct activities such that the monitoring wells remain active and in good standing until corrective action is complete (after which the wells can be properly destroyed) or (b) allow us to direct the primary RP to destroy the wells with the understanding that replacement wells may be necessary in the future.

Mr. William Astle
Malech 1993 Family Trust
July 8, 2004
Page 2

We received no further response from the CVRWQCB, and in the absence of a directive by the CVRWQCB to conduct a PCE investigation, our office cannot object to the monitoring wells being destroyed. However, as stated above, you should be aware that CVRWQCB may later direct Mr. William Astle and/or Malech 1993 Family Trust to install monitoring wells on the property for the investigation of the PCE contamination.

Please contact me at your earliest convenience to inform me of your plan for the monitoring wells. I may be reached at (916) 875-8474 to discuss this, or if you have any other questions about the site status.

Sincerely,



Charley W. Langer
Environmental Specialist III
Site Assessment and Mitigation

Enclosures

CWL:ks

c: Cori Condon, CVRWQCB (with enclosures)
Rick Walls, ENGEO (no enclosures)

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COUNTY OF SACRAMENTO
Environmental Management Department
Mel Knight, Director

Richard Sanchez, Chief
Environmental Health Division
Dennis Groen, Chief
Hazardous Materials Division
Cecilia Jensen, Chief
Water Protection Division

July 8, 2004

Mr. William Astle
RR2 Box 84C
Edwards, MO 65326

Malech 1993 Family Trust
20700 Henwood Road
San Jose, CA 95120

SUBJECT: LOCAL OVERSIGHT PROGRAM (LOP) SITE NO. E587
INDUSTRIAL PLUMBING
1143 BLUMENFELD DRIVE, SACRAMENTO, CA

This letter confirms the completion of a 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 inquiries concerning the underground storage tank(s) is greatly appreciated.

Based on information in the above-referenced file, and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your underground storage tank(s) site is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the Health and Safety Code, and with corrective action regulations adopted pursuant to Section 25299.3 of the Health and Safety Code, and that no further action related to the petroleum release(s) at the site is required.

This notice is issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code.

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

Sincerely,

Mel Knight, Director
Environmental Management Department

MK:CWL:tk

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Case Closure Summary
Local Oversight Program - Leaking Underground Fuel Tank

DATE: JULY 12, 2004

I. AGENCY INFORMATION

| | |
|--|---------------------------------------|
| Agency Name: Sacramento County Environmental Mgmt. Dept. | Address: 8475 Jackson Road, Suite 230 |
| City/State/Zip: Sacramento, CA 95826 | Phone: (916) 875-8560 |
| Responsible staff person: Charley Langer | Title: Environmental Specialist III |

II. Case Information

| Site Facility Name: 1143 Blumenfeld Drive | | | | |
|--|-----------------|--------------------------------------|--------------------------|--------------|
| Site Facility Address: 1143 Blumenfeld Drive, Sacramento, CA | | | | |
| RB LUSTIS Case No: 341091 | | Local Case No. RO0000245 | LOP Case No: E887 | |
| URF file date: 08/21/96 | | GeoTracker Global ID No: T0606700817 | | |
| Responsible Parties: | | Address: | Phone Numbers: | |
| William Astle | | RR2 Box 84C Edwards, MO 65326 | (860) 438-5204 | |
| Tank No. | Size in Gallons | Contents | Closed In-Place/Removed? | Date |
| 1 | 2,000 | Gasoline | Removed | May 17, 1996 |
| 2 | 1,000 | Gasoline | Removed | May 17, 1996 |
| 3 | 1,000 | Diesel Fuel | Removed | May 17, 1996 |

III. Release and Site Characterization Information

| Cause and type of release: UST Releases due to corrosion holes noted along tank bottoms | | | | |
|---|-----------------------------------|---|--|--|
| Site characterization complete? (X) YES () NO Unknown | | Date approved by oversight agency: March 30, 2004 | | |
| Monitoring Wells installed? (X) YES () NO | | Number: 3 | Proper screen interval? (X) YES () NO | |
| Highest GW depth below ground surface: 55.1 feet bgs | | Lowest Depth: 60.1 feet bgs | Flow Direction: Northeast | |
| Most Sensitive Current Use: None | | | | |
| Are drinking water wells affected? () YES (X) NO | | Aquifer name: | | |
| Is surface water affected? () YES (X) NO | | Nearest/affected SW name: | | |
| Off-site beneficial use impacts (addresses/locations): None identified | | | | |
| Report(s) on file? (X) YES () NO | | Where is report(s) filed? Sacramento County Environmental Management | | |
| Treatment and Disposal of Affected Material: Not Applicable | | | | |
| Materials | Amount (Include Units) | Action (Treatment or Disposal w/Destination) | Date | |
| Tanks & Piping | Three UST's and associated piping | Transport to AAA Salvage, Yuba City | May 17, 1996 | |
| Free Product | 185 gallons of UST rinseate | Transported to Chico Drain Oil Service, Chico | May 17, 1996 | |
| Soil Stockpile | 125 Cubic Yards (UST Removals) | Returned to excavation | | |
| Drill Cuttings | 1 Cubic Yard | Disposed onsite | | |
| Groundwater (purge) | 55-gallon drum | To be transported offsite to disposal facility concurrent with well destruction | | |
| Soil | 650 Cubic Yards (Over-Excavation) | Forward Landfill | June 2003 | |

**Case Closure Summary
Local Oversight Program - Leaking Underground Fuel Tank**

III. Release and Site Characterization Information (Continued)

| Maximum Documented Contaminant Concentrations—Before and After Cleanup* | | | | | | | | | |
|---|------------|-------|-------------|-----------|--------------|------------|-------|-------------|-------|
| Contaminant | Soil (ppm) | | Water (ppb) | | Contaminant | Soil (ppm) | | Water (ppb) | |
| | Before | After | Before | After | | Before | After | Before | After |
| TPH (Gas) | 11,000 | 1 | <50 | 74 | Xylenes | 1,200 | 0.062 | <0.5 | 1.0 |
| TPH (Diesel) | 1,600 | <1 | <50 | <50 | Ethylbenzene | 210 | 0.006 | <0.5 | 0.6 |
| Benzene | 150 | 0.016 | <0.5 | <0.5 | Oil & Grease | NA | NA | NA | NA |
| Toluene | 940 | 0.037 | <0.5 | 0.6 | Lead (WET) | 0.31 | NA | NA | NA |
| VOC's | None | None | 145 (PCE) | 126 (PCE) | MTBE (8260) | <5.0 | 1.7 | NA | <0.5 |

Comments (Depth of Remediation, etc.): 650 cy of soil excavated (~35 pounds gasoline). The VOC concentration of 145 ppb for PCE represents pre-existing groundwater impact from an unknown and apparently offsite source.

IV. Closure

Does completed corrective action protect existing beneficial uses per the Regional Basin Plan? **YES**

Does the 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: Review if land use changes

Should corrective action be reviewed if land use changes? Yes No

Monitoring/Vapor extraction wells decommissioned: Yes No No. Decommissioned: 0 No. Retained: 3

List Enforcement Actions Taken: Local Oversight Program - NOR issued 8/26/96

List enforcement actions rescinded:

Fee Title letter received? Yes No

V. Local Agency Representative Data

| | |
|--|--|
| Name: Mel Knight | Title: Director, Environmental Management Department |
| Signature:  | Date: 7/13/04 |

VI. RWQCB Notification

| | |
|------------------------------------|--|
| Date Submitted to RB: | RB Response: |
| RWQCB Staff Name: Christyl Escarda | Title: Sanitary Engineering Associate Date: |

VII. Additional Comments, Data, etc.

No exposure pathways are believed complete; risk assessment not conducted.



California Regional Water Quality Control Board

Central Valley Region

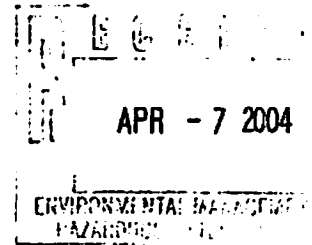
Robert Schneider, Chair



Terry Tamminen
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb5>
11020 Sun Center Drive #200 Rancho Cordova, CA 95670-6114
Phone (916) 464-3291 - Fax (916) 464-4704

Arnold Schwarzenegger
Governor



6 April 2004

Dana Booth
Environmental Specialist IV
County of Sacramento
Environmental Management Department
8475 Jackson Road, Suite 230
Sacramento, CA
95826

CONCURRENCE WITH SACRAMENTO COUNTY STAFF ACTION FOR 1143 BLUMENFELD DRIVE, SACRAMENTO

We reviewed your staff report for this site and agree that the site can receive a No Further Action Required letter for the gasoline constituents. However, the site is being referred to the Regional Board's Site Cleanup Section for the PCE and TCE solvent problems. I discussed this site with Wendy Cohen of that Section and she prefers that the existing monitor wells remain in place for future monitoring for the solvent plume. It is likely that additional, deeper, monitor wells will be necessary.

If you have any questions, you may telephone me at (916) 464-4639 or Wendy at 464-4675.

GORDON LEE BOGGS
Underground Tank
Program Manager
Central Valley Water Board

Cc: Wendy Cohen
Cori Condon

**NO FURTHER ACTION SUMMARY
1143 BLUMENFELD DRIVE
FORMER INDUSTRIAL PLUMBING
CWL; RO0000245; LOP E587
NOVEMBER 7, 2003**

1.0 SUMMARY

May 1996

Soil contamination associated with two gasoline USTs and one diesel UST was discovered during removal of the UST systems in May 1996. Attachments 1 through 3 show the site location, site plan, and sample locations. Soil removal data (samples S-1 through S-6) are included in Attachment 4.

August 1997

Further soil delineation was conducted, and three monitoring wells were installed. Soil analytical data from five soil borings around and through the UST excavation provide adequate vertical and lateral delineation of residual petroleum in soil. Analytical data indicate attenuation of residual TPHg and TPHd in soil between the depths of about 10 and 20 feet bgs. The maximum depth of TPHg detection was 16 feet bgs (216 mg/kg). TPHg was not detected in any of the four soil borings drilled adjacent and lateral to the UST excavation. Attachment 3 shows sampling locations. See Attachments 5 and 6 for cross sections, and Attachments 7 through 9 for soil and groundwater sampling results.

July 1998

Chlorinated solvents were identified in groundwater, and were added to the suite of analyses. PCE has ranged from about 20.4 to 145 $\mu\text{g/l}$, and TCE from about 2.2 to 12.0 $\mu\text{g/l}$. MW-1 and MW-2 appear to have the higher concentrations. The solvents do not appear related to the USTs, and are being addressed separately.

July 2001 – September 2002

Soil vapor sampling, a sensitive receptor survey, and a leaching evaluation were conducted:

- **Soil Vapor.** As part of the PCE and TCE investigation, five soil vapor samples were collected from locations in and around the former tank pit and analyzed for TPHg and BTEX. TPHg was detected in one sample at 24 mg/m^3 ; all other samples were ND for both TPHg and BTEX.
 - **Sensitive Receptor Survey.** The closest supply well is located approximately 2,000 feet downgradient of the Site. No other sensitive receptors were identified. See Attachments 10 and 11 for well survey results.
 - **Leaching Evaluation.** The VLEACH modeling indicated potential groundwater impacts at concentrations significantly above groundwater quality goals.
-

Our office met with CVRWQCB and ENGEO to discuss a request for closure. It was decided that it was necessary to either demonstrate that the remaining soil contamination is not a source of groundwater contamination, or sufficiently remove the residual contamination. There was a suggestion that excavation with confirmation sampling may be the most cost-effective solution.

June 2003

The tank cavity was extended laterally and vertically. Approximately 650 cubic yards of contaminated soil were excavated and disposed. The final dimensions of the excavation were approximately 25 by 25 by 25 feet.

Four samples were collected from the excavation bottom, and four were collected from the sidewalls at approximately 14 feet bgs. Except for one sidewall sample, all samples were ND, or at the reporting limit, for TPHg, BTEX, and MTBE. Benzene and MTBE in the southeast sidewall sample were reported at 0.016 and 1.7 mg/kg, respectively.

All excavated soil was disposed at Forward Landfill. The excavation was backfilled with clean fill. Attachments 12 and 13 show the remedial excavation and sample results.

Groundwater Monitoring

Groundwater is encountered at approximately 55 to 60 feet bgs, with an apparent flow direction consistently toward the northeast to north-northeast. Quarterly monitoring results are in Attachment 9.

Gasoline-range hydrocarbons, reported as TPHg in groundwater, have been consistently reported by the laboratory during seven groundwater monitoring events conducted between August 1997 and May 2003. In July 1998, Excelchem Environmental Labs reported that the gasoline-range hydrocarbons reported as "TPHg" were actually PCE and TCE. All monitoring events for which PCE and TCE have been reported also had "TPHg" reported by the laboratory; however, the "TPHg" results were rejected by the consultant, and not reported in the summary tables, due to the presence of PCE and TCE. The "TPHg" reported during the last two monitoring events again appears mostly due to PCE and TCE from an unidentified source (see Attachment 9B).

Trace levels of BTEX below water quality goals have been reported in groundwater. However, since the soil source has been well defined and almost completely removed, it is unlikely that concentrations will significantly increase (assuming they are the result of leaching from the former onsite soil source).

Case Closure Summary
Local Oversight Program - Leaking Underground Fuel Tank

DATE: JULY 12, 2004

I. AGENCY INFORMATION

| | |
|--|---------------------------------------|
| Agency Name: Sacramento County Environmental Mgmt. Dept. | Address: 8475 Jackson Road, Suite 230 |
| City/State/Zip: Sacramento, CA 95828 | Phone: (916) 875-8550 |
| Responsible staff person: Charley Langer | Title: Environmental Specialist III |

II. Case Information

| | | | | |
|--|--|--------------------------------------|--|-------------------|
| Site Facility Name: 1143 Blumenfeld Drive | | | | |
| Site Facility Address: 1143 Blumenfeld Drive, Sacramento, CA | | | | |
| RB LUSTIS Case No: 341091 | | Local Case No. RO0000245 | | LOP Case No: E587 |
| URF file date: 08/21/96 | | GeoTracker Global ID No: T0608700917 | | |
| Responsible Parties: | | Address: | | Phone Numbers: |
| William Astle | | RR2 Box 84C Edwards, MO 65326 | | (860) 438-6204 |

| Tank No. | Size in Gallons | Contents | Closed In-Place/Removed? | Date |
|----------|-----------------|-------------|--------------------------|--------------|
| 1 | 2,000 | Gasoline | Removed | May 17, 1996 |
| 2 | 1,000 | Gasoline | Removed | May 17, 1996 |
| 3 | 1,000 | Diesel Fuel | Removed | May 17, 1996 |

III. Release and Site Characterization Information

| Cause and type of release: UST Releases due to corrosion holes noted along tank bottoms | | | |
|---|-----------------------------------|---|--|
| Site characterization complete? (X) YES () NO Unknown | | Date approved by oversight agency: March 30, 2004 | |
| Monitoring Wells Installed? (X) YES () NO | | Number: 3 | Proper screen interval? (X) YES () NO |
| Highest GW depth below ground surface: 55.1 feet bgs | | Lowest Depth: 60.1 feet bgs | Flow Direction: Northeast |
| Most Sensitive Current Use: None | | | |
| Are drinking water wells affected? () YES (X) NO | | Aquifer name: | |
| Is surface water affected? () YES (X) NO | | Nearest/affected SW name: | |
| Off-site beneficial use impacts (addresses/locations): None Identified | | | |
| Report(s) on file? (X) YES () NO | | Where is report(s) filed? Sacramento County Environmental Management | |
| Treatment and Disposal of Affected Material: Not Applicable | | | |
| Materials | Amount (Include Units) | Action (Treatment or Disposal w/Destination) | Date |
| Tanks & Piping | Three UST's and associated piping | Transport to AAA Salvage, Yuba City | May 17, 1996 |
| Free Product | 185 gallons of UST rinsate | Transported to Chico Drain Oil Service, Chico | May 17, 1996 |
| Soil Stockpile | 125 Cubic Yards (UST Removals) | Returned to excavation | |
| Drill Cuttings | 1 Cubic Yard | Disposed onsite | |
| Groundwater (purge) | 55-gallon drum | To be transported offsite to disposal facility concurrent with well destruction | |
| Soil | 650 Cubic Yards (Over-Excavation) | Forward Landfill | June 2003 |

Case Closure Summary
Local Oversight Program - Leaking Underground Fuel Tank

III. Release and Site Characterization Information (Continued)

| Maximum Documented Contaminant Concentrations—Before and After Cleanup* | | | | | | | | | |
|---|------------|-------|-------------|-----------|--------------|------------|-------|-------------|-------|
| Contaminant | Soil (ppm) | | Water (ppb) | | Contaminant | Soil (ppm) | | Water (ppb) | |
| | Before | After | Before | After | | Before | After | Before | After |
| TPH (Gas) | 11,000 | 1 | <50 | 74 | Xylenes | 1,200 | 0.062 | <0.5 | 1.0 |
| TPH (Diesel) | 1,800 | <1 | <50 | <50 | Ethylbenzene | 210 | 0.006 | <0.5 | 0.6 |
| Benzene | 150 | 0.016 | <0.5 | <0.5 | Oil & Grease | NA | NA | NA | NA |
| Toluene | 940 | 0.037 | <0.5 | 0.6 | Lead (WET) | 0.31 | NA | NA | NA |
| VOC's | None | None | 145 (PCE) | 128 (PCE) | MTBE (8260) | <5.0 | 1.7 | NA | <0.5 |

Comments (Depth of Remediation, etc.): 650 cy of soil excavated (~35 pounds gasoline). The VOC concentration of 145 ppb for PCE represents pre-existing groundwater impact from an unknown and apparently offsite source.

IV. Closure

| | | |
|---|-----------------------|-----------------|
| Does completed corrective action protect existing beneficial uses per the Regional Basin Plan? YES | | |
| Does the 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: Review if land use changes | | |
| Should corrective action be reviewed if land use changes? (X) Yes () No | | |
| Monitoring/Vapor extraction wells decommissioned: () Yes (X) No | No. Decommissioned: 0 | No. Retained: 3 |
| List Enforcement Actions Taken: Local Oversight Program – NOR issued 8/28/96 | | |
| List enforcement actions rescinded: | | |
| Fee Title letter received? (X) Yes () No | | |

V. Local Agency Representative Data

| | |
|------------------|--|
| Name: Mel Knight | Title: Director, Environmental Management Department |
| Signature: | Date: |

VI. RWQCB Notification

| | | |
|------------------------------------|---------------------------------------|-------|
| Date Submitted to RB: | RB Response: | |
| RWQCB Staff Name: Christyl Escarda | Title: Sanitary Engineering Associate | Date: |

VII. Additional Comments, Data, etc.

| |
|--|
| No exposure pathways are believed complete; risk assessment not conducted. |
|--|

2.0 LOW RISK GROUNDWATER CRITERIA

- 2.1 *The leak has been stopped and sources, including free product, have been removed or remediated:*

The tanks associated with the unauthorized release, and their piping, were removed in 1996. Nearly all contaminated soil has been removed. ENGEO estimates that 35 pounds of gasoline were removed during the June 2003 excavation.

ENGEO's VLEACH model suggests maximum MTBE impacts in year 50 at 41 $\mu\text{g/l}$ (i.e., assuming the only natural attenuation is dilution over 10 feet of well screen), with concentrations reaching the water quality goal of 5 $\mu\text{g/l}$ by year 160. TPHg and benzene were not modeled since MTBE was detected at higher levels and is more mobile. See Attachment 14.

- 2.2 *The site has been adequately characterized:*

The vertical and lateral extents of residual gasoline and diesel fuel hydrocarbons in soil have been adequately defined.

BTEX in groundwater has been detected just slightly above laboratory reporting limits. Relatively low concentrations of "gasoline-range" hydrocarbons in groundwater (less than 100 $\mu\text{g/l}$) have been reported, but appear to be PCE and TCE from an offsite source.

- 2.3 *The contaminant plume is not migrating and chemical concentrations in groundwater are projected to meet water quality objectives through natural attenuation or engineered solutions prior to the beneficial use of groundwater.*

Trace levels of BTEX below water quality goals have been reported in groundwater. However, since the soil source has been well defined and almost completely removed, it is unlikely that concentrations will significantly increase (assuming they are the result of leaching from the former onsite soil source).

- 2.4 *No waters of the State or other sensitive receptors are likely to be impacted:*

The results of a sensitive receptor survey and VLEACH transport modeling indicate negligible probability of future impacts to sensitive receptors.

- 2.5 *The site presents no significant risk to human health or safety.*

Any residual contamination is located below surface soils. Soil vapor sampling has shown there are no detectable BTEX vapors. Thus, there do not appear to be any significant current exposure pathways.

3.0 CV-RWQCB APPENDIX B CHECKLIST

- 3.1 *For groundwater-impacted sites, distance to production wells for municipal, domestic, agriculture, industry and other uses within 2,000 feet of the site;***

A sensitive receptor survey was completed to document the distance to production wells. The closest production well is owned by the City of Sacramento, and is located approximately 2,000 feet downgradient of the Site.

- 3.2 *Site maps, to scale, of area impacted showing locations of former and existing tank systems, excavation contours and sample locations, borings and monitoring well elevation contours, gradients, and nearby surface waters, buildings, streets, and subsurface utilities;***

See attached Figures for site maps and sample location maps.

- 3.3 *Figures depicting lithology (cross sections), treatment system diagrams;***

Soil stratigraphy beneath the site is moderately variable, with sediments ranging from silty sand to poorly graded sand. Groundwater beneath the site exists at approximately 55 to 60 feet bgs. See attached Figures for boring logs and cross-section.

- 3.4 *Stockpiled soil remaining on-site or off-site disposal (quantity);***

Stockpiled soil generated during the May 1996 UST removals was placed back into the original UST excavation after the placement of plastic at the bottom of the excavation. Resulting soil from the June 2003 excavation was disposed at Forward Landfill. There are no residual stockpiles within the Site.

- 3.5 *Monitoring wells remaining onsite, fate;***

There are three monitoring wells onsite. They will be destroyed when it is determined that no further action is necessary.

- 3.6 *Tabulated data of all groundwater elevations and depth to water;***

Groundwater depths and elevations are attached. Data from six groundwater monitoring events completed between August 1997 and May 2003 show a consistent groundwater flow direction to the northeast, and groundwater depths ranging from 55 to 60 feet bgs.

- 3.7 *Tabulated results of all sampling and analysis;***
- *Detection limits for confirmation sampling*
- *Lead analyses*

See attached Tables for tabulated soil and groundwater results.

3.8 Concentration contours of contaminants found and those remaining in soil and groundwater, both on- and off-site;

- *Lateral extent of soil contamination*
- *Vertical extent of soil contamination*
- *Lateral extent of groundwater contamination*
- *Vertical extent of groundwater contamination*

The attached figures adequately depict the volume of impacted soil identified beneath the removed USTs.

3.9 Zone of influence calculated and assumptions used for the subsurface remediation system and the zone of capture attained for the soil and groundwater remediation systems;

NA.

3.10 Reports/information;

- *Unauthorized Release Form*
- *Quarterly monitoring reports*
- *Problem Assessment Report*
- *Final Remediation Plan*
- *Well and borings logs*
- *Other*

All documents, including the certified fee titleholder notification letter, are on file.

3.11 Best Available Technology (BAT) used or an explanation for not using BAT;

A feasibility study showed that soil excavation and disposal was BAT, which was implemented in June 2003.

3.12 Reasons why background was/is unattainable using BAT;

Background was nearly attained. Additional remediation does not appear to be necessary or cost-effective.

3.13 Mass balance calculation of the substance treated versus that remaining;

ENGEO calculated a remaining mass of MTBE of 0.15 pounds. The mass of TPHg and benzene remaining were not calculated by ENGEO since these were only detected, at the laboratory reporting limits, in samples collected from the bottom of the excavation.

3.14 Assumptions, parameters, calculations and model used in risk assessments, and fate and transport modeling;

Leaching:

VLEACH model assumptions are documented in: Varadhan Ravi and Jeffrey A. Johnson, undated, *VLEACH: A One-Dimensional Finite Difference Vadose Zone Leaching Model*. Model input parameters and outputs are documented in the attached.

Risk Evaluation:

No current potential exposure pathways were identified.

3.15 Rationale why conditions remaining at the site will not adversely impact groundwater quality, health, or other beneficial uses; and

See 2.0 above.

3.16 Waste Extraction Test (WET) or TCLP results.

The maximum EPA Method 6010 lead-STLC result was 0.31 mg/l.

ATTACHMENT 1

ENGEO
INCORPORATED

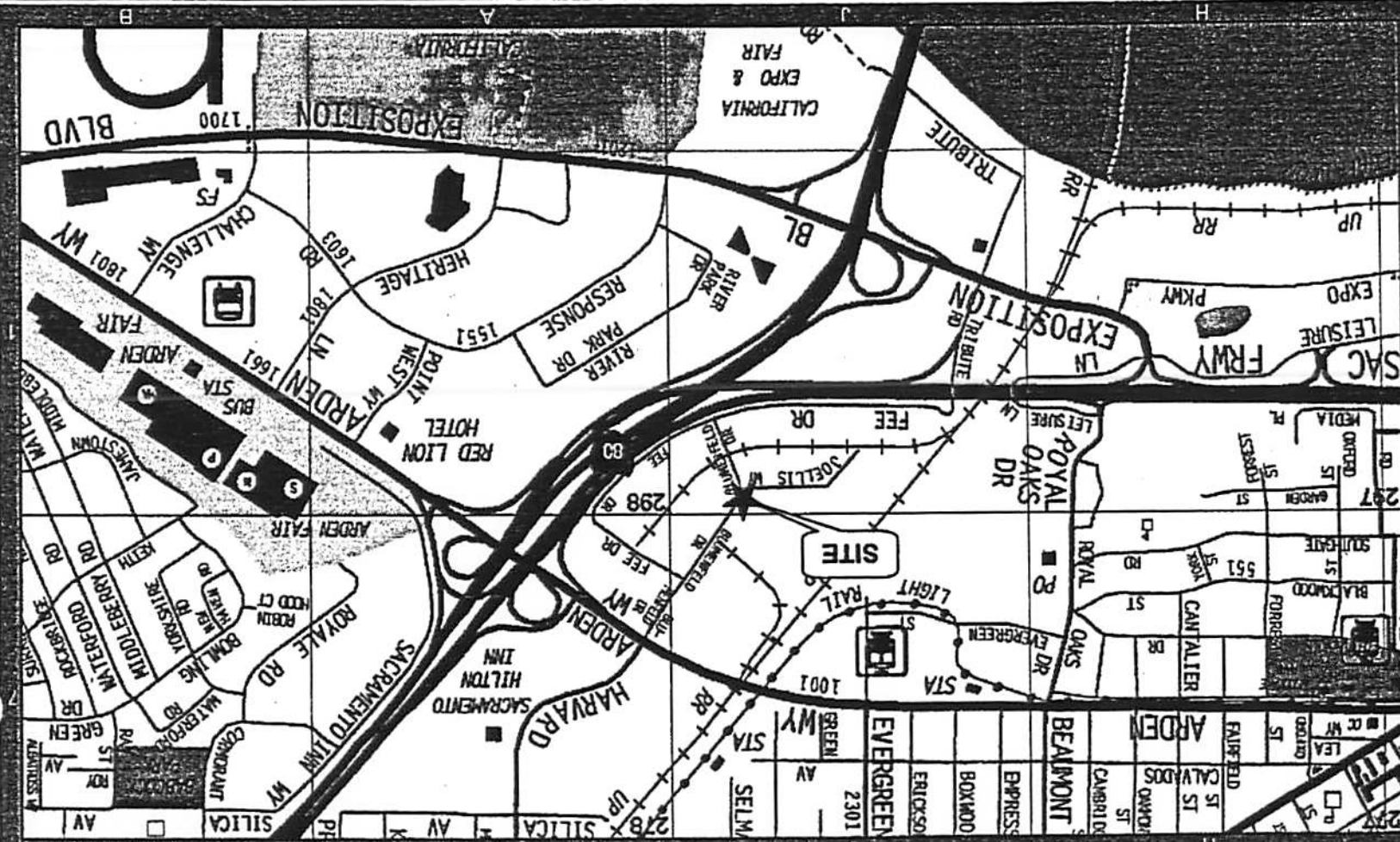
Not to Scale

1143 Blumentfeld Drive
Sacramento, California

VICINITY MAP

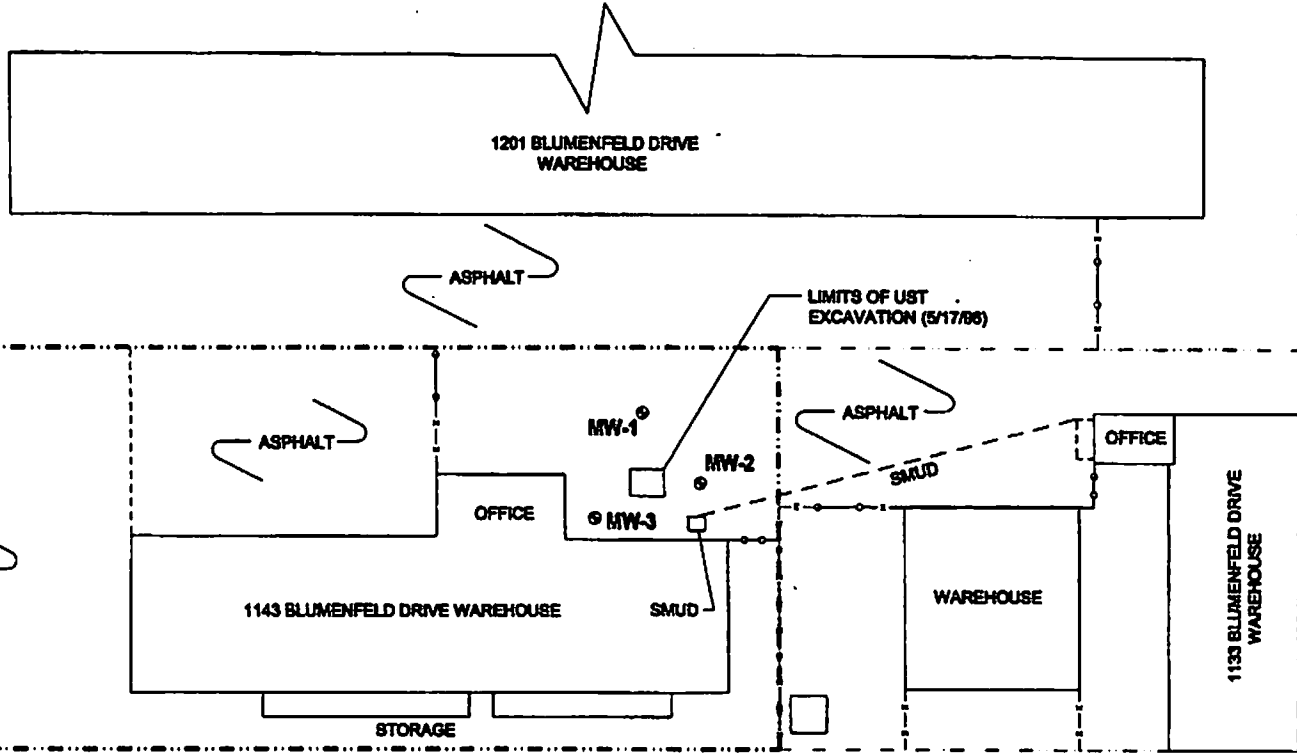
Job No.
4367.5.001.01

Figure 1



©1998 Thomas Elms Maps

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EXPLANATION

- APPROXIMATE LOCATION OF PROPERTY LINE
- - - - - APPROXIMATE LOCATION OF RAILROAD
- · - · - APPROXIMATE LOCATION OF CHAIN LINK FENCE
- MW-1 ◆ APPROXIMATE LOCATION OF MONITORING WELL

BASE MAP SOURCE: UNKNOWN

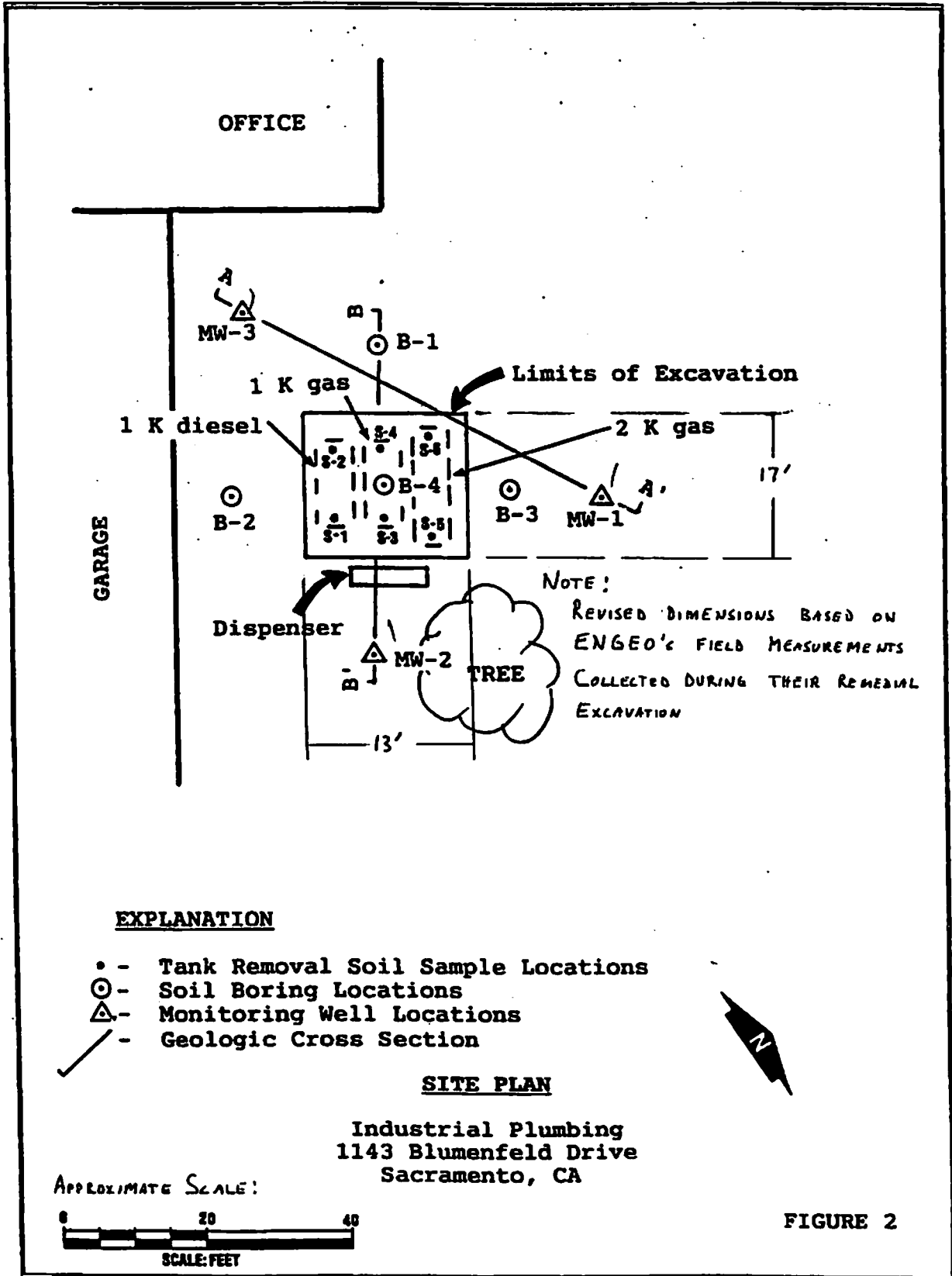


SITE PLAN
1143 BLUMENFELD DRIVE
SACRAMENTO, CALIFORNIA

PROJECT NO: 4367.5.050.01
DATE: JULY 2008
DRAWN BY: DCS CHECKED BY: RHW

SHEET NO: 2

ATTACHMENT
2



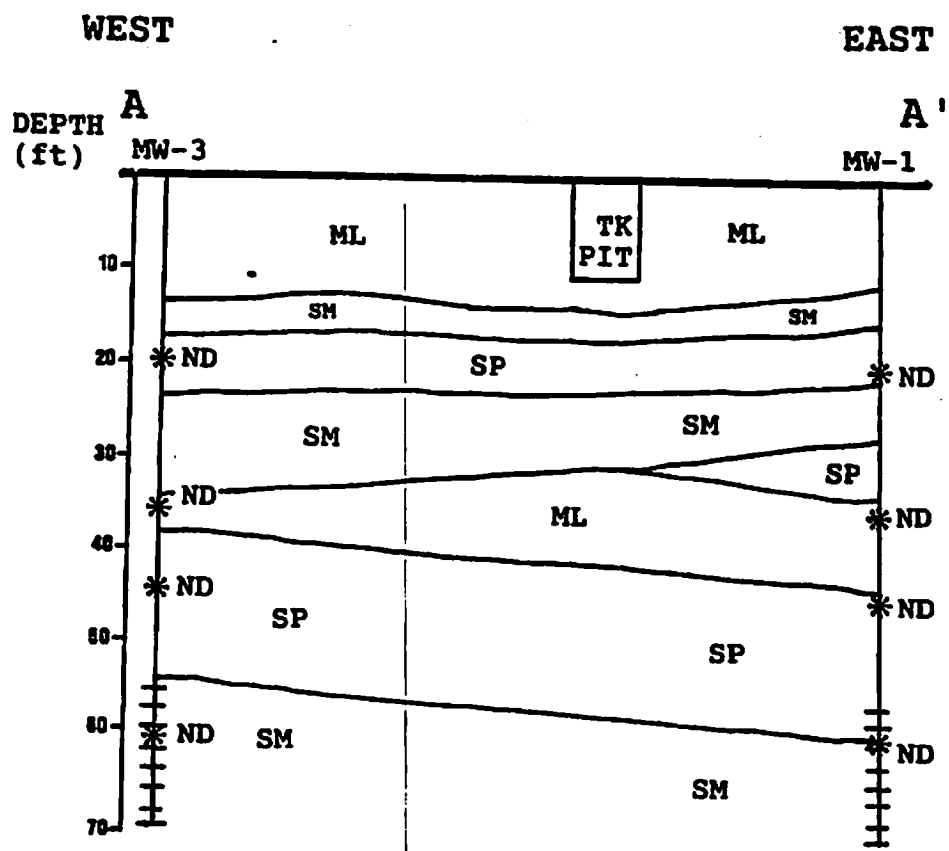
Attachment 4

TABLE 1
SUMMARY OF TANK EXCAVATION SOIL ANALYTICAL RESULTS
(ppm)

| Spl ID | Date | TPHD | TPHg | B | T | E | X | Pb | MTBE |
|--------|---------|------|-------|-----|-----|-----|------|-----|------|
| S-1 | 5/17/96 | 1600 | 6700 | 43 | 470 | 140 | 800 | ND | ND |
| S-2 | 5/17/96 | 570 | 580 | ND | 1.6 | 4.1 | 32 | ND | ND |
| S-3 | 5/17/96 | NA | 11000 | 150 | 940 | 210 | 1200 | ND | ND |
| S-4 | 5/17/96 | NA | 4600 | 20 | 310 | 97 | 580 | ND | ND |
| S-5 | 5/17/96 | NA | 4600 | 8.1 | 190 | 91 | 630 | ND | ND |
| S-6 | 5/17/96 | NA | 9400 | 38 | 590 | 180 | 1100 | .31 | ND |

EXPLANATION:

- TPHD - Total Petroleum Hydrocarbons as diesel
- TPHg - Total Petroleum Hydrocarbons as gasoline
- B - Benzene
- T - Toluene
- E - Ethylbenzene
- X - Xylenes
- Pb - Lead (STLC)
- MTBE - Methyl Tertiary Butyl Ether
- ppm - Parts Per Million
- ND - Not Detected
- NA - Not Analyzed



EXPLANATION

- ML - Silt
- SM - Silty Sand
- SP - Poorly Graded Sand
- * - Soil Sample Locations w/ TPHg Concentrations

GEOLOGIC CROSS SECTION A - A'

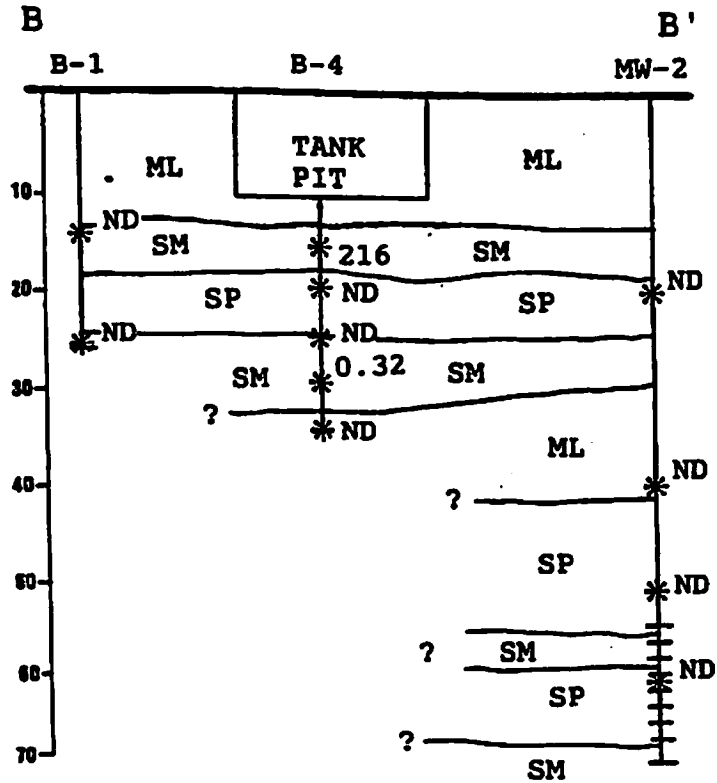
Industrial Plumbing
 1143 Blumenfeld Drive
 Sacramento, CA

Horizontal Scale: 1" = 15'
 Vertical Scale: 1" = 20'

FIGURE 3

NORTHWEST

SOUTHEAST



EXPLANATION

- ML - Silt
- SM - Silty Sand
- SP - Poorly Graded Sand
- * - Soil Sample Locations w/ TPHg Concentrations

GEOLOGIC CROSS SECTION B - B'

Industrial Plumbing
1143 Blumenfeld Drive
Sacramento, CA

Horizontal Scale: 1" = 15'
Vertical Scale: 1" = 20'

FIGURE 4

ATTACHMENT 7

TABLE 2
SUMMARY OF SOIL BORING ANALYTICAL RESULTS
(ppm)

| Spl ID | Date | Depth ft | TPHg | TPHd | B | T | E | X |
|---------|--------|----------|------|------|------|----|----|-----|
| MW-1-4 | 8/5/97 | 21 | ND | ND | ND | ND | ND | ND |
| MW-1-7 | 8/5/97 | 36 | ND | ND | ND | ND | ND | ND |
| MW-1-9 | 8/5/97 | 46 | ND | ND | ND | ND | ND | ND |
| MW-1-11 | 8/5/97 | 59 | ND | ND | ND | ND | ND | ND |
| MW-2-4 | 8/4/97 | 21 | ND | ND | ND | ND | ND | ND |
| MW-2-8 | 8/4/97 | 41.5 | ND | ND | ND | ND | ND | ND |
| MW-2-10 | 8/4/97 | 51 | ND | ND | ND | ND | ND | ND |
| MW-2-12 | 8/4/97 | 60.5 | ND | ND | ND | ND | ND | ND |
| MW-3-4 | 8/5/97 | 21 | ND | ND | ND | ND | ND | ND |
| MW-3-7 | 8/5/97 | 36 | ND | ND | ND | ND | ND | ND |
| MW-3-9 | 8/5/97 | 45.5 | ND | ND | ND | ND | ND | ND |
| MW-3-12 | 8/5/97 | 60.5 | ND | ND | ND | ND | ND | ND |
| B-1-3 | 8/6/97 | 16 | ND | ND | ND | ND | ND | ND |
| B-1-5 | 8/6/97 | 25.5 | ND | ND | ND | ND | ND | ND |
| B-2-4 | 8/4/97 | 20.5 | ND | ND | .011 | ND | ND | ND |
| B-2-5 | 8/4/97 | 25.5 | ND | ND | ND | ND | ND | .10 |
| B-3-2 | 8/4/97 | 11 | ND | ND | ND | ND | ND | ND |
| B-3-3 | 8/4/97 | 16 | ND | ND | ND | ND | ND | ND |
| B-3-5 | 8/4/97 | 25.5 | ND | ND | ND | ND | ND | ND |

TABLE 2 (cont.)

| Spl ID | Date | Depth ft | TPHg | TPHd | B | T | E | X |
|--------|--------|----------|-------|------|------|------|------|------|
| B-4-1 | 8/6/97 | 16 | 216 | ND | 1.13 | 6.34 | 2.50 | 14.8 |
| B-4-2 | 8/6/97 | 20.5 | ND | ND | .027 | .007 | ND | .008 |
| B-4-3 | 8/6/97 | 25.5 | ND | ND | .035 | .020 | ND | .019 |
| B-4-4 | 8/6/97 | 30.5 | 0.319 | ND | .018 | .020 | .005 | .024 |
| B-4-5 | 8/6/97 | 36 | ND | ND | ND | ND | ND | ND |

| Spl ID | Date | Depth ft | MTBE Method 8020 | MTBE Method 8260 |
|--------|--------|----------|------------------|------------------|
| MW-2-4 | 8/4/97 | 21 | 0.006 | 0.005 |
| B-2-5 | 8/4/97 | 25.5 | 0.054 | 0.047 |
| B-3-3 | 8/4/97 | 16 | 0.250 | 0.240 |
| B-4-1 | 8/6/97 | 16 | 4.1 | 4.95 |
| B-4-2 | 8/6/97 | 20.5 | 1.62 | 1.07 |
| B-4-3 | 8/6/97 | 25.5 | 0.109 | 0.118 |
| B-4-4 | 8/6/97 | 30.5 | 0.016 | 0.017 |

EXPLANATION:

ppm = Parts Per Million
 TPHg = Total Petroleum Hydrocarbons as Gasoline
 TPHd = Total Petroleum Hydrocarbons as Diesel
 B = Benzene
 T = Toluene
 E = Ethylbenzene
 X = Xylenes
 MTBE = Methyl tert-Butyl Ether
 ND = Less Than Detection Limit (see Appendix A at the end of JKH's September 11, 1997 PIER for Detection Limits).

TABLE 2
GROUNDWATER ANALYTICAL DATA
1143 BLUMENFELD DRIVE, SACRAMENTO, CALIFORNIA

| Sample Location | Date | TPHd (ug/l) | TPHg (ug/l) | Benzene (ug/l) | Toluene (ug/l) | Ethyl-benzene (ug/l) | Total Xylenes (ug/l) | MTBE (ug/l) | TBA (ug/l) | DIPe (ug/l) | ETBE (ug/l) | TAME (ug/l) | 1,2-DCA (ug/l) | EDB (ug/l) | Total Lead (ug/l) | PCE (ug/l) | TCE (ug/l) |
|-----------------|------------|-------------|-------------|----------------|----------------|----------------------|----------------------|-------------|------------|-------------|-------------|-------------|----------------|------------|-------------------|------------|------------|
| MW-1 | 8/19/1997 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 4/8/1998 | ND | 65 | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/13/1998 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | 145 | 12.0 |
| | 10/12/1998 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | 142 | 11.1 |
| | 9/10/1999 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | 126 | 8.0 |
| | 7/24/2001 | <50 | <50 | <0.5 | 1.1 | <0.5 | <1.0 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | NA | NA |
| 5/21/2003 | <50 | <50 | <0.5 | 2.9 | 1.1 | 4.0 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <10 | NA | NA |
| MW-2 | 8/19/1997 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 4/8/1998 | ND | 61 | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/13/1998 | ND | ND | ND | ND | 1.0 | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | 2.2 |
| | 10/12/1998 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | 3.3 |
| | 9/10/1999 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | 2.5 |
| | 7/24/2001 | <50 | 73 | <0.5 | 1.1 | 4.3 | 1.3 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | NA | NA |
| 5/21/2003 | <50 | 74 | 0.5 | 3.0 | <0.5 | 3.9 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <10 | NA | NA |
| MW-3 | 8/19/1997 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 4/8/1998 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/13/1998 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 10/12/1998 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 9/10/1999 | ND | ND | ND | ND | ND | ND | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/24/2001 | <50 | <50 | <0.5 | 1.2 | <0.5 | 1.2 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | NA | NA |
| 5/21/2003 | <50 | <50 | 0.6 | 3.9 | 1.2 | 4.9 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <10 | NA | NA |

NOTES:

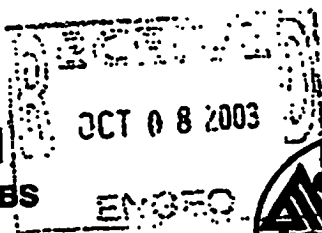
TPHd = Total petroleum hydrocarbons as diesel fuel
 TPHg = Total petroleum hydrocarbons as gasoline
 MTBE = methyl tert-butyl ether
 TBA = tert-butanol
 DIPe = di-isopropyl ether
 ETBE = ethyl tert-butyl ether
 TAME = tert-amyl methyl ether
 ND = not detected at or above laboratory reporting limit
 NA = not analyzed

1,2-DCA = 1,2-dichloroethane
 EDB = 1,2-dibromoethane
 PCB = polychlorinated biphenyls
 TCE = trichloroethane
 ug/L = micrograms per liter or parts per billion
 <0.5 = less than laboratory reporting limit
 TPHd and TPHg analyzed by EPA Method 8015M
 BTEX analyzed by EPA Test Method 8020
 Fuel oxygenates analyzed by EPA Test Method 8260B
 All analytical data prior to July 2001 reported from JKH Engineering report dated January 24, 2000

ATTACHMENT 9

ATTACHMENT 9B

EXCELCHEM ENVIRONMENTAL LABS



500 Giuseppe Court, Suite 3
Roseville, CA 95678
Phone#: (916) 773-3664 Fax#: (916) 773-4784

ANALYSIS REPORT Amended Report

Attention: Rick Walls
Engco
631 Commerce Drive, Ste. 100
Roseville, CA 95678
Project: 1143 Blumenfeld Drive / 4367505001
Method: EPA 8020/8015m

Date Sampled: 05/21/03
Date Received: 05/21/03
BTEX/TPHg Analyzed: 05/23/03
TPHd Analyzed: 05/28/03
Date Amended: 10/08/03

| Client Sample ID. | MW-3 | | MW-2 | | MW-1 | |
|-------------------|----------|---------|----------|---------|----------|---------|
| LAB. NO. | W0503606 | | W0503607 | | W0503608 | |
| ANALYTE | R/L | Results | R/L | Results | R/L | Results |
| Benzene | 0.5 | 0.6 | 0.5 | 0.5 | 0.5 | ND |
| Toluene | 0.5 | 3.9 | 0.5 | 3.0 | 0.5 | 2.9 |
| Ethylbenzene | 0.5 | 1.2 | 0.5 | ND | 0.5 | 1.1 |
| Total Xylenes | 1.0 | 4.9 | 1.0 | 3.9 | 1.0 | 4.0 |
| TPH as Gasoline | 50 | ND | 50 | ND | 50 | ND |
| TPH as Diesel | 50 | ND | 50 | ND | 50 | ND |

| QA/QC %RECOVERY | | |
|-----------------|-----|------|
| | LCS | LCSD |
| Benzene | 85 | 88 |
| Toluene | 93 | 90 |
| Ethylbenzene | 86 | 86 |
| Total Xylenes | 89 | 89 |
| TPH as Diesel | 72 | 72 |

QA/QC Analyzed: 05/22/03
TPHd QA/QC Analyzed: 05/28/03

ND = Not detected. Compound(s) may be present at concentrations below the reporting limit.
R/L = Reporting Limit
Water samples reported in µg/L

REPORT AMENDED TO CORRECT MW-2 AND MW-3 TPH AS GASOLINE RESULTS TAKING INTO ACCOUNT THE HALOGENATED ORGANICS THAT ARE PRESENT IN THE SAMPLES.

Laboratory Representative

05/28/03
Date Reported



Approximate
2000' Radius

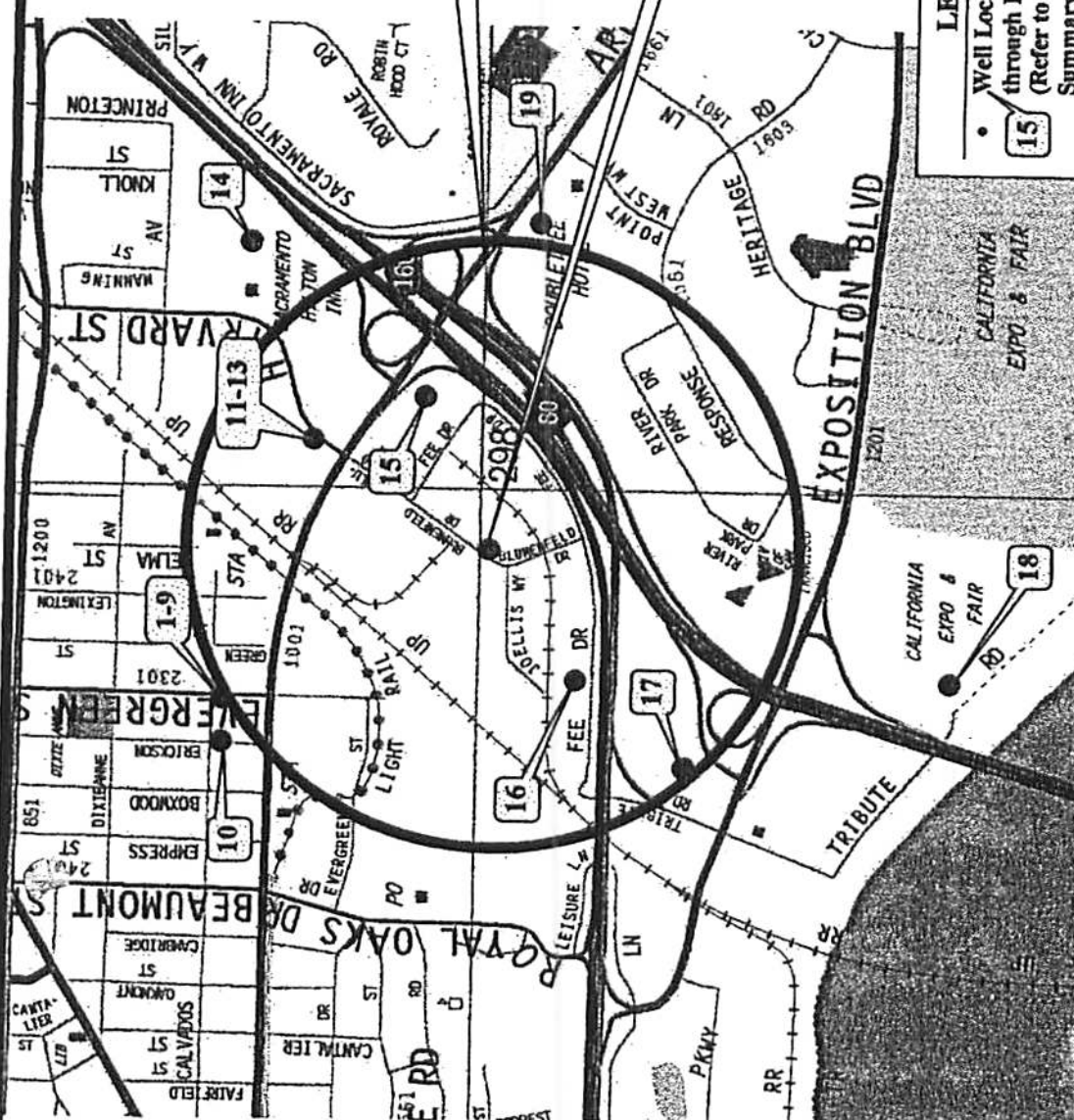
SITE

LEGEND

- Well Location Identified through DWR Well Search (Refer to Table 5 for Well Summary)
- 15

ENGEO
INCORPORATED

1" = 1,200'



SENSITIVE RECEPTOR SURVEY MAP

1143 Blumenfeld Drive
Sacramento, CA

Job No.
4367.5.002.01

Figure 3

**TABLE 4
DWR WELL LOG DATA SUMMARY
1143 BLUMENFELD DRIVE, SACRAMENTO, CALIFORNIA**

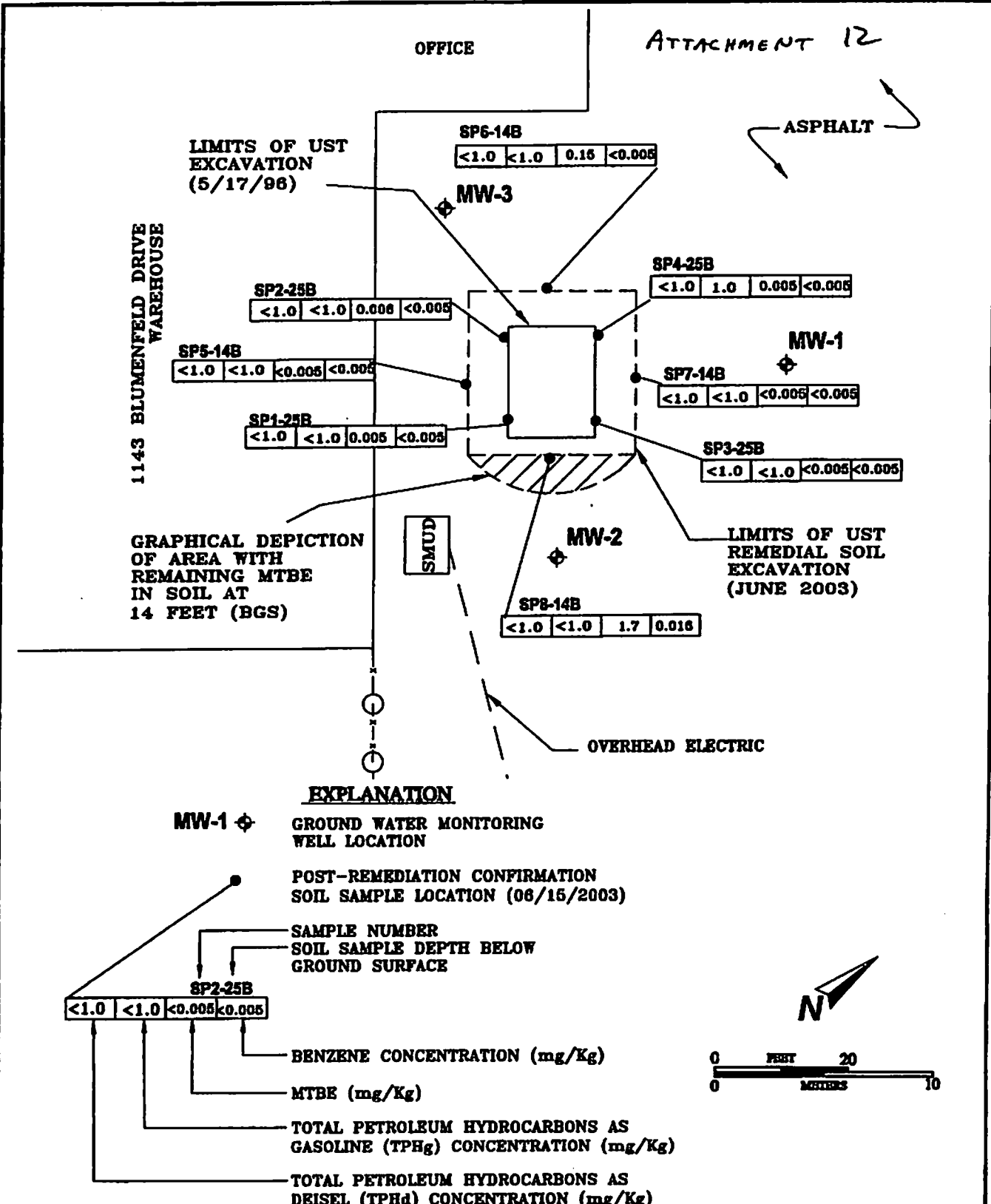
| Map ID Number | Well Owner | Well Type | Tnshp./Range/Sec. | Address/Intersection | Year Drilled | Casing Diameter | Screen Top | Screen Bottom | TD |
|---------------|-----------------------|------------------|-------------------|----------------------------|--------------|-----------------|------------|---------------|-----|
| 1-9 | Kraft, Inc. | Monitoring | 08N 05- 28E | 975 Calvados Ave. | Oct-87 | 2-inch | 55 | 70 | 70 |
| 10 | Anthony Schwan | Vapor Extraction | 09N 05E 28E | 936 Calvados Ave. | Nov-00 | 2-inch | 40 | 60 | 6 |
| 11 | Swanston Packing | NA | 09N 05E 28F | NA | May-48 | 8-inch | NA | NA | 363 |
| 12 | Swanston Packing | NA | 09N 05E 28F | NA | May-48 | 8-inch | NA | NA | 151 |
| 13 | Swanston Packing | NA | 09N 05E 28F | NA | Nov-48 | 8-inch | 166 | 366 | 366 |
| 14 | Starlite Drive-In | Domestic | 09N 05E 28G | NA | Sep-56 | 8-inch | NA | NA | 120 |
| 15 | Madison-Hill Corp. | Industrial | 09N 05E 28K | 335' S Arden; 500' W of 80 | Sep-50 | 10-inch | 131 | 187 | 191 |
| 16 | Ramcon | Monitoring | 09N 05E 28N | 1041 Fee Drive | Dec-86 | 2-inch | 34 | 54 | 54 |
| 17 | City of Sacramento | Municipal | 09N 05E 28 | SW Corner Tribute Rd | Aug-68 | 14-inch | 190 | 275 | 390 |
| 18 | City of Sacramento | Municipal | 09N 05E 28 | Elvis Fwy./Tribute Rd. | Jul-68 | 14-inch | 132 | 372 | 390 |
| 19 | California Exposition | Domestic | 09N 05E 33A | 1400 Arden Way | Sep-67 | 14-inch | 144 | 320 | 326 |
| | CA State Fairgrounds | NA | 09N 05E 28 | Arden Way, SE of 40 | Aug-65 | 6-inch | NA | 114 | 204 |
| | Continental Const. | Municipal | 09N 05E 28 | Arcade Sewage Plant | Sep-57 | 16,10-inch | 78 | 121 | 140 |
| | Guy Atkinson | NA | 09N 05E 28M 1 | NA | Aug-59 | 10-inch | NA | NA | 141 |

Notes:
TD = Total depth
NA = Not available

ATTACHMENT 11

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ATTACHMENT 12



RESIDUAL PETROLEUM HYDROCARBONS IN SOIL
 1143 BLUMENFELD DRIVE
 SACRAMENTO, CALIFORNIA

PROJECT NO.: 4367.5.050.01
 DATE: JULY 2003
 DRAWN BY: DGS CHECKED BY: RHW

FIGURE NO.
5

C:\Documents and Settings\jchoi\Local Settings\Temporary Internet Files\WORKS\4367505001-350k\cnc-703.dwg 8-27-03 10:01:59 AM

TABLE 3
SOIL ANALYTICAL DATA
1143 Blumenfeld Drive, Sacramento, California

| Sample ID | Sample Date | Sample Depth (feet bgs) | Analytes (mg/Kg) | | | | | | |
|-----------|-------------|-------------------------|------------------|---------|--------------|---------------|---------------|-----------------|--------|
| | | | Benzene | Toluene | Ethylbenzene | Total Xylenes | TPH as Diesel | TPH as Gasoline | MTBE |
| SP1-25B | 6/15/2003 | 25.0 | <0.005 | <0.005 | <0.005 | <0.013 | <1.0 | <1.0 | 0.005 |
| SP2-25B | 6/15/2003 | 25.0 | <0.005 | <0.005 | <0.005 | <0.013 | <1.0 | <1.0 | 0.006 |
| SP3-25B | 6/15/2003 | 25.0 | <0.005 | <0.005 | <0.005 | <0.013 | <1.0 | <1.0 | <0.005 |
| SP4-25B | 6/15/2003 | 25.0 | <0.005 | <0.005 | 0.006 | 0.062 | <1.0 | 1.0 | 0.005 |
| SP5-14B | 6/15/2003 | 14.0 | <0.005 | <0.005 | <0.005 | <0.013 | <1.0 | <1.0 | <0.005 |
| SP6-14B | 6/15/2003 | 14.0 | <0.005 | <0.005 | <0.005 | <0.013 | <1.0 | <1.0 | 0.15 |
| SP7-14B | 6/15/2003 | 14.0 | <0.005 | <0.005 | <0.005 | <0.013 | <1.0 | <1.0 | <0.005 |
| SP8-14B | 6/15/2003 | 14.0 | 0.016 | 0.037 | 0.011 | 0.028 | <1.0 | <1.0 | 1.7 |

Notes:
Mg/kg = Milligrams per kilogram, or parts per million

ATTACHMENT 13

TABLE 4
VLEACH MIXING SPREADSHEET FOR MTBE IN WATER
11433 BLUMENFELD DRIVE, SACRAMENTO CALIFORNIA

| Time (Years) | Assumed Infiltration Area (Square feet) | Rainfall Infiltration Rate (feet/year) | Rainfall Volume (CF/Yr.) | Leachate Mass (g/year) | Leachate Concentration (ug/l/year) | Mixing Zone Concentration (ug/l) |
|-----------------|---|--|--------------------------------|------------------------------|--|--|
| 5 | 3400 | 0.15 | 510 | 4.40E-01 | 30.5 | 1.3 |
| 10 | 3400 | 0.15 | 510 | 1.30E+00 | 90.0 | 3.9 |
| 15 | 3400 | 0.15 | 510 | 2.80E+00 | 193.9 | 8.4 |
| 20 | 3400 | 0.15 | 510 | 4.80E+00 | 318.5 | 13.7 |
| 25 | 3400 | 0.15 | 510 | 6.70E+00 | 483.9 | 20.0 |
| 30 | 3400 | 0.15 | 510 | 8.90E+00 | 616.2 | 26.6 |
| 35 | 3400 | 0.15 | 510 | 1.09E+01 | 754.7 | 32.5 |
| 40 | 3400 | 0.15 | 510 | 1.24E+01 | 858.5 | 37.0 |
| 45 | 3400 | 0.15 | 510 | 1.34E+01 | 927.8 | 40.0 |
| 50 | 3400 | 0.15 | 510 | 1.38E+01 | 955.5 | 41.2 |
| 55 | 3400 | 0.15 | 510 | 1.38E+01 | 941.8 | 40.6 |
| 60 | 3400 | 0.15 | 510 | 1.30E+01 | 900.1 | 38.8 |
| 65 | 3400 | 0.15 | 510 | 1.21E+01 | 837.8 | 36.1 |
| 70 | 3400 | 0.15 | 510 | 1.12E+01 | 776.8 | 33.5 |
| 75 | 3400 | 0.15 | 510 | 1.02E+01 | 709.0 | 30.6 |
| 80 | 3400 | 0.15 | 510 | 9.28E+00 | 642.5 | 27.7 |
| 85 | 3400 | 0.15 | 510 | 8.38E+00 | 580.2 | 25.0 |
| 90 | 3400 | 0.15 | 510 | 7.54E+00 | 522.0 | 22.5 |
| 95 | 3400 | 0.15 | 510 | 6.77E+00 | 488.7 | 20.2 |
| 100 | 3400 | 0.15 | 510 | 6.08E+00 | 419.8 | 18.1 |
| 105 | 3400 | 0.15 | 510 | 5.43E+00 | 376.0 | 16.2 |
| 110 | 3400 | 0.15 | 510 | 4.85E+00 | 335.8 | 14.5 |
| 115 | 3400 | 0.15 | 510 | 4.33E+00 | 299.8 | 12.9 |
| 120 | 3400 | 0.15 | 510 | 3.87E+00 | 287.8 | 11.5 |
| 125 | 3400 | 0.15 | 510 | 3.45E+00 | 238.9 | 10.3 |
| 130 | 3400 | 0.15 | 510 | 3.08E+00 | 213.2 | 9.2 |
| 135 | 3400 | 0.15 | 510 | 2.74E+00 | 189.7 | 8.2 |
| 140 | 3400 | 0.15 | 510 | 2.44E+00 | 168.9 | 7.3 |
| 145 | 3400 | 0.15 | 510 | 2.18E+00 | 150.9 | 6.5 |
| 150 | 3400 | 0.15 | 510 | 1.94E+00 | 134.3 | 5.8 |
| 155 | 3400 | 0.15 | 510 | 1.73E+00 | 119.8 | 5.2 |
| 160 | 3400 | 0.15 | 510 | 1.54E+00 | 106.6 | 4.6 |

ATTACHMENT 14

TABLE 4
VLEACH MIXING SPREADSHEET FOR MTBE IN WATER
11433 BLUMENFELD DRIVE, SACRAMENTO CALIFORNIA

| Time (Years) | Assumed Infiltration Area (Square feet) | Rainfall Infiltration Rate (feet/year) | Rainfall Volume (CFYr.) | Leachate Mass (g/year) | Leachate Concentration (ug/l/year) | Mixing Zone Concentration (ug/l) |
|--|---|--|-------------------------|------------------------|------------------------------------|----------------------------------|
| 165 | 3400 | 0.15 | 510 | 1.37E+00 | 94.9 | 4.1 |
| 170 | 3400 | 0.15 | 510 | 1.22E+00 | 84.5 | 3.6 |
| 175 | 3400 | 0.15 | 510 | 1.09E+00 | 75.5 | 3.3 |
| 180 | 3400 | 0.15 | 510 | 9.70E-01 | 67.2 | 2.9 |
| 185 | 3400 | 0.15 | 510 | 8.60E-01 | 59.5 | 2.6 |
| 190 | 3400 | 0.15 | 510 | 7.70E-01 | 53.3 | 2.3 |
| 195 | 3400 | 0.15 | 510 | 6.80E-01 | 47.1 | 2.0 |
| 200 | 3400 | 0.15 | 510 | 6.10E-01 | 42.2 | 1.8 |
| 205 | 3400 | 0.15 | 510 | 5.40E-01 | 37.4 | 1.6 |
| 210 | 3400 | 0.15 | 510 | 4.80E-01 | 33.2 | 1.4 |
| 215 | 3400 | 0.15 | 510 | 4.30E-01 | 29.8 | 1.3 |
| 220 | 3400 | 0.15 | 510 | 3.80E-01 | 26.3 | 1.1 |
| 250 | 3400 | 0.15 | 510 | 1.90E-01 | 13.2 | 0.8 |
| 300 | 3400 | 0.15 | 510 | 6.00E-01 | 41.5 | 1.8 |
| 400 | 3400 | 0.15 | 510 | 6.00E-01 | 41.5 | 1.8 |
| 500 | 3400 | 0.15 | 510 | 5.90E-01 | 40.8 | 1.8 |
| Note: This output spreadsheet reflects changed VLEACH input parameters as listed below. | | | | | | |
| Free Air Diffusion Coefficient changed from 0 to 0.72 | | | | | | |
| Organic Carbon Changed from 0.005 to 0.001 | | | | | | |
| Soil Bulk Density Changed from 1.3 to 1.5 | | | | | | |
| Input MTBE Koc = 11 | | | | | | |
| Input MTBE Henry's Law Constant = 0.45 | | | | | | |
| Input MTBE Solubility = 60,000 mg/l | | | | | | |
| Input soil MTBE concentrations as follows: | | | | | | |
| | Depth | Concentration (ug/kg) | | | | |
| | 0' - 13' | Set at Zero for VLEACH Input | | | | |
| | 14' - 15' | 1,700 | | | | |
| | 16' - 18' | 1,000 | | | | |
| | 19' - 21' | 450 | | | | |
| | 22' - 24' | 6 | | | | |
| | 25' - 60' | Set at Zero for VLEACH Input | | | | |
| Maximum predicted MTBE "mixed groundwater" impact is 41.2 ug/l at Year 50. | | | | | | |

1143 BLUMENFELD DRIVE; MTBE VLEACH ANALYSIS (JULY 2003)

| | | | | | | | |
|-----------|-------|--------|--------|------|------|-----|-------|
| 1 | 0.25 | 500. | 5. | 5. | | | |
| | 11. | .045 | 50000. | 0.72 | | | |
| POLYGON 1 | 3400. | 1. | 0.15 | 1.5 | 0.35 | 0.2 | 0.001 |
| | 0. | -1. | -1. | | | | |
| 60Y | | 200.0 | | | | | |
| 1 | 13 | 0.0 | | | | | |
| 14 | 15 | 1700.0 | | | | | |
| 16 | 18 | 1000.0 | | | | | |
| 19 | 21 | 450.0 | | | | | |
| 22 | 24 | 5.0 | | | | | |
| 25 | 60 | 0.0 | | | | | |

| | | |
|--------|-------------|-------------|
| 465.00 | 0.39535E-06 | 0.13442E-02 |
| 470.00 | 0.35221E-06 | 0.11975E-02 |
| 475.00 | 0.31378E-06 | 0.10669E-02 |
| 480.00 | 0.27955E-06 | 0.95045E-03 |
| 485.00 | 0.24904E-06 | 0.84675E-03 |
| 490.00 | 0.22187E-06 | 0.75436E-03 |
| 495.00 | 0.19766E-06 | 0.67206E-03 |
| 500.00 | 0.17610E-06 | 0.59873E-03 |

TOTAL GROUNDWATER IMPACT

| Time (yr) | Mass (g/yr) | Cumulative Mass (g) |
|-----------|-------------|---------------------|
| 5.00 | 0.43944 | 0.95428 |
| 10.00 | 1.3506 | 5.3344 |
| 15.00 | 2.7700 | 15.606 |
| 20.00 | 4.6362 | 34.196 |
| 25.00 | 6.7821 | 62.940 |
| 30.00 | 8.9693 | 102.63 |
| 35.00 | 10.943 | 152.79 |
| 40.00 | 12.487 | 211.78 |
| 45.00 | 13.461 | 277.02 |
| 50.00 | 13.822 | 345.52 |
| 55.00 | 13.630 | 414.34 |
| 60.00 | 13.028 | 481.04 |
| 65.00 | 12.179 | 544.02 |
| 70.00 | 11.221 | 602.43 |
| 75.00 | 10.240 | 655.96 |
| 80.00 | 9.2862 | 704.64 |
| 85.00 | 8.3837 | 748.67 |
| 90.00 | 7.5443 | 788.36 |
| 95.00 | 6.7726 | 824.03 |
| 100.00 | 6.0688 | 856.02 |
| 105.00 | 5.4305 | 884.66 |
| 110.00 | 4.8544 | 910.27 |
| 115.00 | 4.3358 | 933.16 |
| 120.00 | 3.8704 | 953.60 |
| 125.00 | 3.4533 | 971.83 |
| 130.00 | 3.0800 | 988.10 |
| 135.00 | 2.7464 | 1002.6 |
| 140.00 | 2.4484 | 1015.5 |
| 145.00 | 2.1824 | 1027.1 |
| 150.00 | 1.9450 | 1037.4 |
| 155.00 | 1.7333 | 1046.5 |
| 160.00 | 1.5446 | 1054.7 |
| 165.00 | 1.3763 | 1062.0 |
| 170.00 | 1.2263 | 1068.4 |
| 175.00 | 1.0926 | 1074.2 |
| 180.00 | 0.97346 | 1079.3 |
| 185.00 | 0.86730 | 1083.9 |
| 190.00 | 0.77270 | 1088.0 |
| 195.00 | 0.68842 | 1091.7 |
| 200.00 | 0.61333 | 1094.9 |
| 205.00 | 0.54642 | 1097.8 |
| 210.00 | 0.48681 | 1100.4 |
| 215.00 | 0.43370 | 1102.6 |

| | | |
|--------|-------------|--------|
| 220.00 | 0.38638 | 1104.7 |
| 225.00 | 0.34423 | 1106.5 |
| 230.00 | 0.30667 | 1108.1 |
| 235.00 | 0.27321 | 1109.6 |
| 240.00 | 0.24340 | 1110.9 |
| 245.00 | 0.21685 | 1112.0 |
| 250.00 | 0.19319 | 1113.0 |
| 255.00 | 0.17211 | 1113.9 |
| 260.00 | 0.15333 | 1114.7 |
| 265.00 | 0.13660 | 1115.5 |
| 270.00 | 0.12170 | 1116.1 |
| 275.00 | 0.10842 | 1116.7 |
| 280.00 | 0.96589E-01 | 1117.2 |
| 285.00 | 0.86051E-01 | 1117.7 |
| 290.00 | 0.76662E-01 | 1118.1 |
| 295.00 | 0.68297E-01 | 1118.4 |
| 300.00 | 0.60846E-01 | 1118.7 |
| 305.00 | 0.54207E-01 | 1119.0 |
| 310.00 | 0.48293E-01 | 1119.3 |
| 315.00 | 0.43023E-01 | 1119.5 |
| 320.00 | 0.38329E-01 | 1119.7 |
| 325.00 | 0.34147E-01 | 1119.9 |
| 330.00 | 0.30421E-01 | 1120.1 |
| 335.00 | 0.27102E-01 | 1120.2 |
| 340.00 | 0.24145E-01 | 1120.3 |
| 345.00 | 0.21511E-01 | 1120.4 |
| 350.00 | 0.19164E-01 | 1120.5 |
| 355.00 | 0.17073E-01 | 1120.6 |
| 360.00 | 0.15210E-01 | 1120.7 |
| 365.00 | 0.13551E-01 | 1120.9 |
| 370.00 | 0.12072E-01 | 1120.8 |
| 375.00 | 0.10755E-01 | 1120.9 |
| 380.00 | 0.95814E-02 | 1121.0 |
| 385.00 | 0.85360E-02 | 1121.0 |
| 390.00 | 0.76047E-02 | 1121.0 |
| 395.00 | 0.67749E-02 | 1121.1 |
| 400.00 | 0.60357E-02 | 1121.1 |
| 405.00 | 0.53772E-02 | 1121.1 |
| 410.00 | 0.47905E-02 | 1121.2 |
| 415.00 | 0.42678E-02 | 1121.2 |
| 420.00 | 0.38022E-02 | 1121.2 |
| 425.00 | 0.33873E-02 | 1121.2 |
| 430.00 | 0.30177E-02 | 1121.2 |
| 435.00 | 0.26885E-02 | 1121.2 |
| 440.00 | 0.23951E-02 | 1121.3 |
| 445.00 | 0.21338E-02 | 1121.3 |
| 450.00 | 0.19010E-02 | 1121.3 |
| 455.00 | 0.16936E-02 | 1121.3 |
| 460.00 | 0.15088E-02 | 1121.3 |
| 465.00 | 0.13442E-02 | 1121.3 |
| 470.00 | 0.11975E-02 | 1121.3 |
| 475.00 | 0.10669E-02 | 1121.3 |
| 480.00 | 0.95045E-03 | 1121.3 |
| 485.00 | 0.84675E-03 | 1121.3 |
| 490.00 | 0.75436E-03 | 1121.3 |
| 495.00 | 0.67206E-03 | 1121.3 |
| 500.00 | 0.59873E-03 | 1121.3 |

Transaction Screen Assessment Report
1143 Blumenfeld Drive, Sacramento, Sacramento County, California
July 9, 2017

**ATTACHMENT 4
STATEMENT OF QUALIFICATION
INSURANCE LIABILITY**

STATEMENT OF QUALIFICATIONS

phase1assessments.com

Farshad Vakili, PE

phase1assessments.com

273 Canyon Fall Drive,

Folsom California 95630

Mobile: 916-804-6232

Fax: 916-988-6639

www.phase1assessments.com

COMPANY PROFILE

Phase1assessments.com is an environmental consulting firm providing services to banks, contractors, commercial brokers and investors, residential developers, real estate agents, attorneys, mortgage companies, property owners, prospective buyers, property sellers and development companies associated with real estate transactions, commercial or industrial loans and business leases.

Our company is fully insured and conducts Phase 1 and II Environmental Site Assessments as well as Limited Environmental Screen Reports for property transactions and initial environmental investigations and has been serving the Northern California area since 2006. All assessments are conducted by a registered Professional Environmental Engineer and meet ASTM Standards.

As a professional engineer Mr. Farshad Vakili founded the company and has been doing business as the President and Principal Engineer since 2006. Mr. Vakili has experience in all the phases of federal and state permitting procedures and regulatory agency documentation. His extensive knowledge of the local, state and federal regulatory process is attributed to his 30 plus years working as an Environmental Engineer and Environmental Manager for California Department of Toxic Substances Control as well as a Fairchild Semi-Conductor Company in San Rafael California. Mr. Vakili retired from California Department of Toxic Substances Control after 30 plus years of environmental engineering service on March 1, 2016. Mr. Vakili has also completed over 200 plus Phase I and Phase II Reports for local banks and prospective buyers since 2006.

Limited Environmental Screening Reports

Reliance Letter (SBA) / Read & Rely Letter (Banks) / Transition Screening Assessment

Not all circumstances require a full Phase I Environmental Site Assessment (ESA). A limited scope environmental report can be successful at screening for high environmental risk properties. These reports or letters inform if there are any known environmental liabilities at the property and/or if there is a need to conduct a full Phase I ESA Report should you decide to go forward.

If the purchase is completed for one of the Limited Environmental Screening Reports and the decision is to have a full Phase I ESA Report within three months, we will apply the payment for the initial report toward the cost of the Phase I ESA Report.

Phase I Environmental Site Assessment Report

Our Phase I ESA reports adhere to and exceed the American Society of Testing & Materials E-1527-13 Standards and are normally performed for commercial structures, residential developments, agricultural lands and industrial properties, and are usually required by banks for real estate purchase loans or refinancing. The scope of the report includes a site visit, historical research, geology and hydrogeology review, regulatory agency search and interviews.

Phase II Environmental Site Assessment Report

The purpose of a Phase II ESA Report is to determine the presence of petroleum products or hazardous constituents in the subsurface area of the site. Our Phase II ESA Reports are conducted according to the ASTM Standard Guidelines for investigation at contaminated sites or to meet a client's specific needs.

Farshad Vakili PE., phase1assessment.com, President, and Principal Engineer

Mr. Vakili has over 30 years of experience in all phases of federal and state hazardous waste permitting and regulatory agency activities. Mr. Vakili founded phase1Assessments.com and has been conducting business as the President and Principal Engineer since 2006. Mr. Vakili's knowledge of the local, state and federal regulatory process is attributed to his 30 plus years working as the Chief of Permitting Storage and Treatment Unit for the California Department of Toxic Substances Control (DTSC). During his tenure over the past 30 years with DTSC, Mr. Vakili was responsible for permitting hazardous waste facilities; corrective action remediation; enforcement assistance; closure verification; groundwater monitoring data interpretation; project management assignments; staff supervision tasks; holding public meetings/hearings and drafting consent agreements for remediation activities. As a Waste Management Engineer for the California Department of Health Services (DHS) in 1986-1990, Mr. Vakili successfully established a program to initiate new law for used oil handlers and recyclers in the State of California and providing technical support to treatment storage and disposal facilities across the State. The activities included issuing variances from permitting requirements and overseeing the corrective action at contaminated facilities. Mr. Vakili was the contributing author in Used Oil Regulations and the author of the widely used manual on How to Obtain State Permits. Mr. Vakili served as DHS Subject Matter Expert in adopting USEPA regulations and representing DHS in the industry.

As an Environmental Health and Safety Manager for Fairchild Semi-Conductor in San Rafael, California Mr. Vakili was responsible for the health and safety of all corporate staff and ensuring company compliance with local, state and federal laws. This included corporate regulation compliance, development and enforcement of all personnel health and safety policies including the disaster recovery plan for air, water and soil contamination and/or exposure and managing the emergency coordination plan in the event of a catastrophe. He was rewarded with greatly reducing the air pollution produced by the Facility through a project he managed and implemented consisting of evaluating alternative chemicals used in production and compliance with Bay Area Air Pollution Control District.

Professional Engineer in Mechanical Engineering in the State of California

COMMON POLICY DECLARATIONS

Policy No.

Renewal of Number

INSURANCE IS PROVIDED BY
ROCKHILL INSURANCE COMPANY
 KANSAS CITY, MISSOURI

Named Insured and Mailing Address

Agent

Farshad Vakili, P.E.

 273 Canyon Falls Drive
 Folsom, CA 95630

Hull & Company, Inc.
 3247 West March Lane
 Suite 110
 Stockton, CA 95219

Policy Period: From To

12:01 A.M. Standard Time at your Mailing address shown above.
 (Unless otherwise Endorsed)

Business Description: Environmental Operations

Form of Business: Corporation - private

IN RETURN FOR THE PAYMENT OF THE PREMIUM, AND SUBJECT TO ALL OF THE TERMS OF THIS POLICY, WE AGREE WITH YOU TO PROVIDE THE INSURANCE STATED IN THIS POLICY.

THIS POLICY CONSISTS OF THE FOLLOWING COVERAGE PARTS FOR WHICH A PREMIUM IS INDICATED. THIS PREMIUM MAY BE SUBJECT TO ADJUSTMENT.

| COVERAGE PART | LIMITS OF INSURANCE: | COVERAGE PART (FORM NUMBER) |
|--|----------------------|-----------------------------|
| <u>Commercial General Liability</u> | | |
| General Aggregate Limit: | 1,000,000 | CG 00 01 12/04 |
| Products/Completed Operations Aggregate Limit: | 1,000,000 | |
| Personal and Advertising Injury Limit: | 1,000,000 | |
| Each Occurrence Limit: | 1,000,000 | |
| Damage to Premises Rented to You Limit: | 50,000 | |
| Medical Expense Limit: | 5,000 | |
| <u>Contractors Pollution Liability Occurrence</u> | | |
| Aggregate Limit: | 2,000,000 | RHIC 6201 01/11 |
| Each Contractors Pollution Condition Limit: | 1,000,000 | |
| <u>Professional Liability</u> | | |
| Aggregate Limit: | 2,000,000 | RHIC 6101 01/11 |
| Each Professional Services Incident Limit: | 1,000,000 | |
| <i>Covered Professional Services: "Professional Services" performed by the named insured for others for a fee.</i> | | |

Broker Fee \$150.00
 State Taxes \$67.50
 Stamping Fee \$4.50

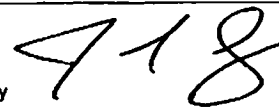
| | |
|---|------------|
| PREMIUM | \$2,250.00 |
| (25 % MINIMUM EARNED PREMIUM) | \$563.00 |
| TERRORISM (IF PURCHASED IS 100% MINIMUM EARNED) | N/A |
| TOTAL MINIMUM & DEPOSIT PREMIUM | \$2,250.00 |

Premium shown is payable: at inception

Additional Form(s) and Endorsement(s) that are made a part of this policy at time of issue and that add, change, exclude or limit coverage are listed below.

*Omits applicable Forms and Endorsements if shown in specific Coverage Part/Coverage Form Declarations.
 Date of Issue: 10/17/2016

Countersigned By



AUTHORIZED REPRESENTATIVE

THESE DECLARATIONS TOGETHER WITH THE COMMON POLICY CONDITIONS, COVERAGE PART DECLARATIONS, COVERAGE PART COVERAGE FORM(S) AND FORMS AND ENDORSEMENTS, IF ANY, ISSUED TO FORM A PART THEREOF, COMPLETE THE ABOVE NUMBERED POLICY.

RHIC 6000 (8/11)

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