DECON ENVIRONMENTAL SERVICES, INC.

23490 Connecticut Street
Hayward, California 94545
510.773-9137–510.782-8584 Fax

January 12, 2005

Mr. William J. Gaffney
NAPA SANITATION DISTRICT
935 Hartle Court
Napa, CA 94559

Re: November 2004 Compliance Monitoring Results for the Jefferson Car Wash Site Groundwater Extraction and Treatment System, 3080 Jefferson Street, Napa, California, Industrial User Permit No. 495950.

Dear Mr. Gaffney:

This letter presents the results of November 2004 Compliance Monitoring for the Groundwater Extraction and Treatment System (System) at the Jefferson Car Wash site, 3080 Jefferson Street, Napa, California. Compliance monitoring and reporting have been conducted in accordance with the guidelines stipulated in the Industrial User Permit No. 495950. Presented herein are the results of the 8th compliance monitoring event after System start-up, which occurred on March 29, 2004.

The compliance monitoring activities for this reporting period were performed by Decon Environmental Services, the operations and maintenance (O&M) contractor for the System, under the direction of Malcolm Pirnie on December 2, 2004. The monitoring activities included:

1. Sampling the System effluent.
2. Recording the total volume of raw water discharged from individual extraction wells (EW-2 and EW-3).
3. Recording the total volume of treated water discharged to sanitary sewer.

Per the Permit requirements, effluent samples were analyzed for total petroleum hydrocarbons as diesel (TPH-D) by United States Environmental Protection Agency (USEPA) Method 8015M, TPH as gasoline (TPH-G), benzene, toluene, ethylene, total xylenes (BTEX), and methyl-tertiary-butyl ether (MTBE) by USEPA Method 8260B, and total lead by USEPA Method 200.7.

Table 1 presents the analytical results for the System effluent and the System flow parameters. The analytical laboratory report is attached.

The analytical laboratory reported the concentrations of constituents of concern to be non-detect in the System effluent. The average daily discharge rate for this reporting period was estimated to be 5.95 gallons per minute (gpm), which was below the 8 gpm limit. A total of 188,550 gallons of treated water was discharged to the sanitary sewer during this reporting period.

Please contact Jason at (510) 732-6444 Ext. 17 or Todd Miller with Malcolm Pirnie at (510) 735-3014 to discuss any comments or questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

DECON ENVIRONMENTAL SERVICES

Jason Gulbransen
Project Manager

Attachments: Table 1, Analytical Laboratory Report

c: George Altamura, Altamura Enterprises
Joel Coffman, Napa County
Todd Miller, Malcolm Pirnie

File (4459-008)
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Table 1: Compliance Monitoring Results, November 2004
Interim Groundwater Extraction and Treatment System
Jefferson Car Wash Site
Industrial User Permit No: 495950

Parameter	Units	USEPA Method	Date Collected	System Effluent	Permitted Reporting Limit[1]
Volatile Organic Compounds					
Methyl Tertiary-Butyl Ether	µg/L[6]	8260B	12/2/2004	< 1	1.0% LEL[4]
Benzene	µg/L	8260B	12/2/2004	< 0.5	1.0% LEL
Toluene	µg/L	8260B	12/2/2004	< 0.5	1.0% LEL
Ethylbenzene	µg/L	8260B	12/2/2004	< 0.5	1.0% LEL
Xylenes, Total	µg/L	8260B	12/2/2004	< 1	1.0% LEL
TPH as Gasoline	µg/L	8260B	12/2/2004	< 25	--[5]
TPH as Diesel	µg/L	8015M	12/2/2004	< 58	--
Total Lead	mg/L[7]	200.7	12/2/2004	< 0.05	0.14
Operational					
Total Volume Discharged to Sanitary Sewer[2]	gallons	--	12/2/2004	188,550	--
Daily Average System Flow Rate[3]	gpm[8]	--	12/2/2004	5.95	8

Notes:

[1] As stated in Industrial User Permit, No: 495950, issued for the System on 03/02/2004.

[2] The sum of volumes extracted from individual wells, EW-2 and EW-3, for this period as recorded by the flow totalizer at the respective well-head.

i.e., { Sum of Flow Totalizer Volume at EW-2 and EW-3 for this period } -
{ Sum of Flow Totalizer Volume at EW-2 and EW-3 for the previous period }

[3] Calculated as the *Total Volume Discharged to Sanitary Sewer* divided by the number of days the system was in operation during the reporting period (22 days for this period).

[4] Lower explosive limit.

[5] No reporting limit stated or not applicable.

[6] Micrograms per liter.

[7] Milligrams per liter.

[8] Gallons per minute.

Entech Analytical Labs, Inc.

3334 Victor Court • Santa Clara, CA 95054 • (408) 588-0200 • Fax (408) 588-0201

Certificate ID: 41469 - 12/9/2004 4:24:56 PM

Jason Gulbransen
Decon Environmental Services, Inc.
23490 Connecticut Street
Hayward, CA 94545

Order: 41469
Project Name: Jefferson Carwash
Project Number: 4470

Date Collected: 12/2/2004
Date Received: 12/3/2004
P.O. Number: 4470

Certificate of Analysis - Final Report

On December 03, 2004, sample was received under chain of custody for analysis. Entech analyzes samples "as received" unless otherwise noted. The following results are included:

Matrix	Test	Method	Comments
Liquid	8260Petroleum	EPA 8260B	
	Lead	EPA 200.7	
	TPH as Gasoline - GC/MS	GC-MS	
	TPH-Extractable	EPA 8015 MOD. (Extractable)	

Entech Analytical Labs, Inc. is certified for environmental analyses by the State of California (#2346).
If you have any questions regarding this report, please call us at 408-588-0200 ext. 225.

Sincerely,

Laurie Glantz-Murphy
Laboratory Director

Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054 Phone: (408) 588-0200 Fax: (408) 588-0201

Decon Environmental Services, Inc.
23490 Connecticut Street
Hayward, CA 94545
Attn: Jason Gulbransen

Project Number: 4470
Project Name: Jefferson Carwash
Date Received: 12/3/2004
P.O. Number: 4470
Sampled By: Client

Certificate of Analysis - Data Report

Lab # : 41469-001 **Sample ID: Discharge Point** **Matrix:** Liquid **Sample Date:** 12/2/2004 7:40 AM

Method: EPA 200.7 / EPA 3010B / Acid Digestion for ICP for 6010B

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Lead	ND		1	0.05	mg/L	12/03/2004	WM041203	12/06/2004	WICP1041206

Analyzed by: FKha
Reviewed by: MFELIX

Method: EPA 8015 MOD. (Extractable) / EPA 3510C / Sep. funnel liquid/liquid extraction

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Diesel	ND		1	58	µg/L	N/A	N/A	12/08/2004	DW4829A

Surrogate	Surrogate Recovery	Control Limits (%)
o-Terphenyl	103	22 - 133

Analyzed by: Jhsiang
Reviewed by: LGLANTZ

Method: EPA 8260B / EPA 5030B / Purge & Trap

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Benzene	ND		1	0.5	µg/L	N/A	N/A	12/03/2004	WMS1041203
Toluene	ND		1	0.5	µg/L	N/A	N/A	12/03/2004	WMS1041203
Ethyl Benzene	ND		1	0.5	µg/L	N/A	N/A	12/03/2004	WMS1041203
Xylenes, Total	ND		1	1	µg/L	N/A	N/A	12/03/2004	WMS1041203
Methyl-t-butyl Ether	ND		1	1	µg/L	N/A	N/A	12/03/2004	WMS1041203

Surrogate	Surrogate Recovery	Control Limits (%)
4-Bromofluorobenzene	87.9	75 - 125
Dibromofluoromethane	109	75 - 125
Toluene-d8	97.2	75 - 125

Analyzed by: Xbian
Reviewed by: MTU

Method: GC-MS

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Gasoline	ND		1	25	µg/L	N/A	N/A	12/03/2004	WMS1041203

Surrogate	Surrogate Recovery	Control Limits (%)
4-Bromofluorobenzene	96.4	75 - 125
Dibromofluoromethane	108	75 - 125
Toluene-d8	98.6	75 - 125

Analyzed by: Xbian
Reviewed by: MTU

Detection Limit = Detection Limit for Reporting.
DF = Dilution and/or Prep Factor including sample volume adjustments.
ND = Not Detected at or above the Detection Limit.

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Quality Control - Method Blank

Liquid

Validated by: LGLANTZ - 12/09/04

QC Batch ID: DW4829A

Analysis Date: 12/7/2004

Method Blank **Method: EPA 8015 MOD. (Extractable)**

Parameter	Result	DF	PQLR	Units
TPH as Diesel	ND	1	58	µg/L

Surrogate for Blank	% Recovery	Control Limits
o-Terphenyl	**93.4**	22 - 133

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Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: LGLANTZ - 12/09/04

QC Batch ID: DW4829A

Analysis Date: 12/7/2004

LCS **Method: EPA 8015 MOD. (Extractable)** **Conc. Units: µg/L**

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<24	1000	913	LCS	12/7/2004	**91.3**			35 - 109

Surrogate	% Recovery	Control Limits
o-Terphenyl	**118**	22 - 133

LCSD **Method: EPA 8015 MOD. (Extractable)** **Conc. Units: µg/L**

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<24	1000	889	LCSD	12/7/2004	**88.9**	**2.7**	25	35 - 109

Surrogate	% Recovery	Control Limits
o-Terphenyl	**116**	22 - 133

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Quality Control - Method Blank

Liquid

Validated by: MTU - 12/06/04

QC Batch ID: WMS1041203

Analysis Date: 12/3/2004

Method Blank **Method: EPA 8260B**

Parameter	Result	DF	PQLR	Units
Benzene	ND	1	0.5	µg/L
Ethyl Benzene	ND	1	0.5	µg/L
Methyl-t-butyl Ether	ND	1	1	µg/L
Toluene	ND	1	0.5	µg/L
Xylenes, Total	ND	1	1	µg/L

Surrogate for Blank	% Recovery	Control Limits
4-Bromofluorobenzene	**86.8**	75 - 125
Dibromofluoromethane	**92.3**	75 - 125
Toluene-d8	**96.1**	75 - 125

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Quality Control - Method Blank

Liquid

Validated by: MTU - 12/06/04

QC Batch ID: WMS1041203

Analysis Date: 12/3/2004

Method Blank **Method: EPA 8260B**

Parameter	Result	DF	PQLR	Units
TPH as Gasoline	ND	1	25	µg/L

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Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: MTU - 12/06/04

QC Batch ID: WMS1041203

Analysis Date: 12/3/2004

LCS **Method: EPA 8260B** **Conc. Units: µg/L**

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene	<0.2	20.0	20.8	LCS	12/3/2004	**104**			80 - 120
Methyl-t-butyl Ether	<0.3	20.0	18.9	LCS	12/3/2004	**94.5**			80 - 120
Toluene	<0.2	20.0	18.6	LCS	12/3/2004	**93.0**			80 - 120

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	**93.2**	75 - 125
Dibromofluoromethane	**107**	75 - 125
Toluene-d8	**90.7**	75 - 125

LCSD **Method: EPA 8260B** **Conc. Units: µg/L**

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene	<0.2	20.0	21.8	LCSD	12/3/2004	**109**	**4.7**	25	80 - 120
Methyl-t-butyl Ether	<0.3	20.0	18.8	LCSD	12/3/2004	**94.0**	**0.5**	25	80 - 120
Toluene	<0.2	20.0	20.0	LCSD	12/3/2004	**100**	**7.3**	25	80 - 120

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	**89.9**	75 - 125
Dibromofluoromethane	**103**	75 - 125
Toluene-d8	**90.8**	75 - 125

LCS **Method: GC-MS** **Conc. Units: µg/L**

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<6.45	125	115	LCS	12/3/2004	**92.3**			65 - 135

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	**97.5**	75 - 125
Dibromofluoromethane	**95.3**	75 - 125
Toluene-d8	**96**	75 - 125

LCSD **Method: GC-MS** **Conc. Units: µg/L**

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<6.45	125	106	LCSD	12/3/2004	**85.0**	**8.3**	25	65 - 135

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	**94.2**	75 - 125
Dibromofluoromethane	**94.4**	75 - 125
Toluene-d8	**96.8**	75 - 125

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Quality Control - Laboratory Control Spike / Duplicate Results
Liquid

Prep Batch ID: WM041203 Reviewed by: MFELIX - 12/06/04 **QC Batch ID: WICP2041206**

Prep Date: 12/3/2004 **Analysis Date: 12/6/2004**

LCS **Method: EPA 200.7** **Conc. Units:** mg/L

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
Barium	<0.001	0.500	0.497	LCS	12/6/2004	**99.5**			75 - 125
Cadmium	<0.002	0.500	0.516	LCS	12/6/2004	**103**			75 - 125
Calcium	<0.02	10.0	9.94	LCS	12/6/2004	**99.4**			75 - 125
Chromium	<0.003	0.500	0.505	LCS	12/6/2004	**101**			75 - 125
Cobalt	<0.002	0.500	0.505	LCS	12/6/2004	**101**			75 - 125
Copper	<0.001	0.500	0.522	LCS	12/6/2004	**104**			75 - 125
Lead	<0.02	0.500	0.499	LCS	12/6/2004	**99.8**			75 - 125
Molybdenum	<0.004	0.500	0.511	LCS	12/6/2004	**102**			75 - 125
Nickel	<0.003	0.500	0.553	LCS	12/6/2004	**111**			75 - 125
Silver	<0.003	0.500	0.511	LCS	12/6/2004	**102**			75 - 125
Tin	<0.02	1.00	0.984	LCS	12/6/2004	**98.4**			75 - 125
Titanium	<0.001	1.00	1.03	LCS	12/6/2004	**103**			75 - 125
Vanadium	<0.003	0.500	0.597	LCS	12/6/2004	**119**			75 - 125
Zinc	<0.0008	0.500	0.523	LCS	12/6/2004	**105**			75 - 125

LCSD **Method: EPA 200.7** **Conc. Units:** mg/L

Parameter	Blank (MDL)	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
Barium	<0.001	0.500	0.504	LCSD	12/6/2004	**101**	**1.4**	25	75 - 125
Cadmium	<0.002	0.500	0.527	LCSD	12/6/2004	**105**	**2.0**	25	75 - 125
Calcium	<0.02	10.0	10.1	LCSD	12/6/2004	**101**	**1.2**	25	75 - 125
Chromium	<0.002	0.500	0.515	LCSD	12/6/2004	**103**	**2.0**	25	75 - 125
Cobalt	<0.002	0.500	0.512	LCSD	12/6/2004	**102**	**1.4**	25	75 - 125
Copper	<0.001	0.500	0.527	LCSD	12/6/2004	**105**	**0.9**	25	75 - 125
Lead	<0.02	0.500	0.476	LCSD	12/6/2004	**95.2**	**4.8**	25	75 - 125
Molybdenum	<0.004	0.500	0.516	LCSD	12/6/2004	**103**	**1.0**	25	75 - 125
Nickel	<0.003	0.500	0.556	LCSD	12/6/2004	**111**	**0.4**	25	75 - 125
Silver	<0.002	0.500	0.530	LCSD	12/6/2004	**106**	**3.8**	25	75 - 125
Tin	<0.02	1.00	1.01	LCSD	12/6/2004	**101**	**2.2**	25	75 - 125
Titanium	<0.001	1.00	1.04	LCSD	12/6/2004	**104**	**1.0**	25	75 - 125
Vanadium	<0.003	0.500	0.610	LCSD	12/6/2004	**122**	**2.2**	25	75 - 125
Zinc	<0.003	0.500	0.533	LCSD	12/6/2004	**107**	**2.0**	25	75 - 125

Entech Analytical Labs, Inc.

3334 Victor Court (408) 588-0200
Santa Clara, CA 95054 (408) 588-0201 - Fax

Chain of Custody / Analysis Request

Attention to: Lou Bransen	Phone No.: 5107326444 ext 17	Purchase Order No.: 4470	Invoice to: (If Different)	Phone:
Company Name: DEION ENV. SCVS. Inc	Fax No.: 510 782 8584	Project No.: 4470	Company:	Quote No.:
Mailing Address: 23490 Connecticut St	Email Address:	Project Name: Jefferson Car Wash GWTS	Billing Address: (If Different)	
City: Hayward	State: CA / Zip Code: 94545	Project Location: 1050 Pueblo Ave, Napa, CA	City:	State: / Zip:

Sampler: JMG

Field Org. Code:

Global ID:

Turn Around Time
- ❑ Same Day
- ❑ 1 Day
- ❑ 2 Day
- ❑ 3 Day
- ❑ 4 Day
- ❑ 5 Day
- ☒ 10 Day

Order ID:

Client ID / Field Point	Lab. No.	Sample Date	Sample Time	Matrix	No. of Containers	EPA 8260B	BTEX ☒ MTBE ☒ TPH Gas ❑ by 8260B	5 Oxygenates (MTBE, TBA, ETBA, DIPE, TAME) ❑ Lead Scavengers (1,2-DCA & EDB) ❑ Ethanol ❑	Base/Neutral/Acid Organics 8270C ❑ PAH - 8270C SIM ❑ 8270C ❑ PAH - 8270C ❑	TPH - GAS by 8015MS	TPH Extractable: Diesel ❑ Motor Oil ❑ Other ❑ w/ Si-Gel Cleanup ❑	Pesticides-8081 ❑ PCBs - 8082 ❑	TPH as Gas/BTEX ❑ MTBE ❑ by 8015M/8020	Methanol by 8015M	TPH - Diesel	Anions: F ❑ Cl ❑ Br ❑ SO4 ❑ NO3 ❑ NO2 ❑ PO4 ❑	pH ❑ TSS ❑ SC ❑ TOC ❑ TRPH ❑ O & G ❑	Metals - Circle Below Total ☒ Dissolved ❑ STLC ❑ TCLP ❑	Remarks
Discharge Point	41469-001	12-2-04	740				X			X					X			X	1,569,600 gal

Relinquished by:	Received by:	Date:	Time:
[signature]	[signature]	12-3-04	0805
[signature]	[signature]	12/3/04	1100

Special Instructions or Comments

Metals:
Al, As, Sb, Ba, Be, Bi, B, Cd, Ce, Ca, Cr, Co, Cs, Cu, Fe, Pb, Mg, Mn,
Ga, Ge, Hg, In, Li, Mo, Ni, P, K, Si, Ag, Na, S, Se, Sr, Ta, Te, Tl, Sn, Ti, Zn, V, W, Zr

- ❑ EDD Report
- ❑ EDF Report
- ❑ Plating
- ❑ LUFT-5
- ❑ RCRA-8
- ❑ PPM-13
- ❑ CAM-17