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DOCKET
08-AFC-10

DATE	<u>DEC 15 2009</u>
RECD.	<u>DEC 15 2009</u>

December 15, 2009

371322.DI.DR

Mr. Rod Jones
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Lodi Energy Center (08-AFC-10)
Preliminary Endangerment Assessment Workplan, Preliminary Endangerment
Assessment, and Determination of No Further Action for the Lodi Energy Center

Dear Mr. Jones:

Attached please find one original and 12 copies of the following three documents:

- Preliminary Endangerment Assessment Workplan for the Proposed Lodi Energy Center Site;
- Preliminary Endangerment Assessment for the Proposed Lodi Energy Center Site; and
- Determination of No Further Action for the Lodi Energy Site

If you have any questions about this matter, please contact me at (916) 286-0249 or Andrea Grenier at (916) 780-1171.

Sincerely,

CH2M HILL

A handwritten signature in black ink, appearing to read "Sarah Madams".

Sarah Madams
AFC Project Manager

Attachment

cc: A. Grenier
E. Warner/NCPA



Stantec Consulting Corporation
3017 Kilgore Road Suite 100
Rancho Cordova CA 95670
Tel: (916) 861-0400
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Stantec

November 2, 2009
File: 185702098

Mr. D. Stephen Schwabauer
Lodi City Attorney
City of Lodi
221 West Pine St
Lodi, California 95240

Reference: **Preliminary Endangerment Assessment**
Proposed Lodi Energy Center Site
12745 N. Thornton Road
Lodi, California 95240

Dear Mr. Schwabauer:

Stantec Consulting Corporation (Stantec) is pleased to submit this Preliminary Endangerment Assessment report for the above referenced site. This copy is sent to you as the project proponent to forward under the City's cover letter to the California Environmental Protection Agency, Department of Toxic Substances Control. If you have any questions, please do not hesitate to contact me.

Sincerely,

STANTEC CONSULTING CORPORATION

A handwritten signature in blue ink that reads "Gary D. Haeck".

Gary D. Haeck, Ph.D., P.G.
Managing Senior Geologist
Tel: (916) 861-0400
Fax: (916) 861-0430

Attachment: Preliminary Endangerment Assessment

- c. Maria Gillette, DTSC
- Leah Goldberg, Meyers Nave
- Ed Warner, NCPA
- Sarah Madams, CH2MHill



Stantec

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November 2, 2009
File: 185702098.200.0004

Ms. Maria Gillette, Project Manager
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
Sacramento Field Office
8800 Cal Center Drive
Sacramento, California, 95826-3200

Dear Ms. Gillette:

**Reference: Preliminary Endangerment Assessment
Proposed Lodi Energy Center Site
12745 N. Thornton Road
San Joaquin County APN 055-139-16
Lodi, California 95240**

On behalf of the City of Lodi (City), Stantec Consulting Corporation (Stantec) presents this modified *Preliminary Endangerment Assessment* (PEA) for the proposed Lodi Energy Center (LEC) (Site) (Figures 1 and 2) referenced above. This PEA was completed in accordance with Stantec's August 13, 2009 *Preliminary Endangerment Assessment Workplan* (Workplan) and the California Department of Toxic Substances Control (DTSC) *Preliminary Endangerment Assessment Guidance Manual* (DTSC Guidance) (DTSC, 1994/1999), with the exceptions noted below. Stantec's PEA Workplan was approved by DTSC in August 31, 2009 email correspondence and formally approved in DTSC's September 3, 2009 letter entitled *Approval of Final Workplan for the Preliminary Endangerment Assessment of the Proposed Lodi Energy Center Site, 12745 N. Thornton Road, Lodi, San Joaquin County, California*.

BACKGROUND

The Northern California Power Agency (NCPA) is proposing to construct on City of Lodi property a natural gas-fired electrical power generation facility (LEC) on a 4.4 acre portion (Site) of San Joaquin County APN 055-139-16 in Lodi, California. NCPA contracted Carlton Engineering Inc. (Carlton) to perform a Phase I Environmental Site Assessment (ESA) at the Site. The June 30, 2008 ESA identified several potential environmental concerns (PECs). Based on the ESA results, the California Energy Commission (CEC) (lead agency for licensing thermal power plants 50 megawatts and larger under the California Environmental Quality Act) requested that NCPA conduct field sampling and soil analyses to adequately characterize the presence of harmful chemicals at the Site and discuss potential risks from these chemicals. In compliance, NCPA directed CH2M HILL to perform a limited Phase II Environmental Site Assessment (Phase II ESA) to comply with the CEC request.

On February 2, 2009, CH2M HILL performed preliminary soil sampling and analyses to provide data regarding the PECs identified in the Carlton ESA. CH2M HILL summarized the data in the

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February 26, 2009 Memorandum entitled *NCPA Lodi Preliminary Phase II ESA Sample Results* and compared it to various agency soil-screening levels to evaluate risk to human health. CH2M HILL concluded that exposure of construction workers and onsite industrial workers to surface and subsurface soils may adversely affect human health. Based on these results, the CEC requested that additional investigation and evaluation of risk (PEA) be conducted under DTSC oversight.

The City completed a Voluntary Cleanup Agreement with DTSC for the project (executed on September 3, 2009) and contracted with Stantec to perform the required PEA. DTSC approved Stantec's PEA Workplan on August 31, 2009 and Stantec completed the field investigation portion of the PEA on September 1 and 2, 2009. During report preparation and review of the February 2, 2009 soil analyses, it became apparent that the polycyclic aromatic hydrocarbon (PAH) and organochlorine pesticide data (reported as micrograms per kilogram (ug/kg)) had been inadvertently tabulated with units of milligrams per kilogram (mg/kg). This unit's error resulted in a one-thousand fold increase in concentrations from their actual values. When these inflated concentration data had been compared to and exceeded several of the various risk-based screening levels it created a false impression that significant risk to human health was present primarily from PAH soil impacts.

About this time, Stantec's preliminary PEA analytical results were received and they confirmed that no risk to human health and safety is present at the Site. Stantec informed the City of the error and a conference call with DTSC was conducted to discuss the situation. The conference call was held on September 30, 2009 and participants included representatives of the City, Stantec, DTSC, NCPA, and CH2M HILL. DTSC indicated that based on this information, a No Further Action Required (NFAR) letter was appropriate. It was agreed that CH2M HILL would send a letter acknowledging the units error to the City for forwarding along with the Stantec PEA analytical results to DTSC. DTSC agreed that it would issue a NFAR letter for the LEC project upon receipt of this information from the City. This modified PEA briefly presents the results of the investigation and because the soil data do not exceed risk based screening levels, a formal evaluation of risk as outlined in Sections 7.0 and 8.0 of the Workplan is not presented.

PRE-FIELD INVESTIGATION EFFORTS

Stantec marked the proposed boring locations with white paint and contacted Underground Service Alert (USA) at least 48-hours prior to drilling. Stantec also contracted a private utility locating service and cleared the area prior to drilling.

Soil boring permits were obtained from San Joaquin County Environmental Health Department (SJCEHD) prior to the commencement of drilling activities. A copy is included as Attachment 1.

FIELD INVESTIGATION

The investigation was completed on September 1 and 2, 2009 in accordance with procedures outlined in the approved Workplan (and the included Site Safety Plan [SSP], Sampling and Analysis Plan [SAP] and Quality Assurance Project Plan [QAPP]). Stantec contracted Gregg Drilling and

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Testing, a C-57 licensed drilling contractor from Martinez, California to mobilize a direct-push rig. However, because part of the Site was considered Giant Garter Snake habitat, Stantec complied with a request from the San Joaquin Council of Governments to not utilize rig equipment to advance any borings within 200 feet of the southern canal (Figure 2). A total of 24 borings (B-8 through B-27), including four borings (BG-4 though BG-7) to collect background samples, were advanced by hand auger techniques to a maximum depth of approximately 6.5 feet below ground surface (bgs). Insitu soil samples were collected with a slide hammer sampler at two, four, and six feet bgs in all borings with procedures specified in the SAP. Per DTSC request, four additional samples were collected from depths of 0.5 feet bgs. All soil samples were field screened for volatiles with a Photoionization Detector (PID); PID readings were non-detect for all samples. Groundwater was not encountered in any borings and they were properly backfilled under the supervision of SJCEHD each day.

One groundwater sample was also collected from an existing on-site groundwater monitoring well WSM-3.

ANALYTICAL PROGRAM

The approved analytical program initially consisted of a two-phase approach where analysis of the four-foot samples was to be contingent on the results of the two- and six-foot samples. Because of the discovery of the unit's error on the February 2, 2009 analyses, the only four-foot samples analyzed were those collected from the background borings, which were analyzed for selected analytes.

A total of 55 samples were analyzed in the first round including the following:

- Two- and six-foot samples from the 20 characterization borings (40 samples),
- Two- and six-foot samples from the four background borings (8 samples),
- Four 0.5-foot samples from selected characterization borings (4 samples), and
- Three duplicate samples (5 percent required duplicates).

The above samples were analyzed for the following:

- Polycyclic Aromatic Hydrocarbons (PAHs) by EPA Method 8270C (GC/MS-SIM),
- Organochlorine Pesticides (OCPs) by EPA Method 8081A,
- CAM 17 metals by EPA Methods 6020B and 7471A,
- Total Petroleum Hydrocarbons (TPH) quantified as gasoline, diesel, and motor oil by EPA Method 8260B or 8015M (as appropriate),
- Volatile Organic Compounds (VOCs) by EPA Methods 5035 and 8260B – DTSC requested a spatially representative subset of four two-foot bgs soil samples from the 20 proposed soil boring locations (B-8, B-13, B-18, and B-22).

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The one groundwater sample collected from onsite well WSM-3 was analyzed for PAHs, OCPs, and CAM 17 metals in accordance with the above methods.

The analytical results are compiled in Tables 1 through 5. Copies of the laboratory analytical reports and chain of custody documentation are included as Attachment 2.

DATA VALIDATION, QUALITY ASSURANCE PROGRAM

Because of the project's evolution, formal completion of a data validation process was not performed.

The analytical laboratory prepared its data package utilizing Level-III quality assurance/quality control (QA/QC) methods. No data were deemed non-representative after completing all required QA/QC processes. The associated laboratory documentation (nearly 1,000 pages) is included on CD in Attachment 3.

INVESTIGATION-DERIVED WASTES

Investigation-derived wastes, monitoring well purge water, and decontamination water were collected in properly-labeled Department of Transportation (DOT)-approved 55-gallon drums and temporarily stored onsite. The drums were removed on October 5, 2009 by Belshire Environmental Services, a state-licensed and certified waste hauler, and transported as non-hazardous waste according to applicable federal, state, and local regulations. The drum of soil cuttings went to TPST Soil Recyclers of California in Adelanto, California and the drum of purge water went to the Demenno Kerdoon facility in Compton, California. Copies of the manifests are included in Attachment 4.

ANALYTICAL RESULTS

Because of the project's evolution, a formal evaluation of risk to human health in accordance with *DTSC Guidance* and Section 7.0 of the Workplan was not completed. A brief discussion of the results and comparison with risk-based screening criteria is presented. The Workplan proposed to compare soil analytical data to the following risk-based screening criteria using a hierarchical approach in the order listed below:

- California Human Health Screening Levels (CHHSLs) for commercial/industrial land use;
- USEPA Regional Screening Levels (RSLs) for industrial soil; and
- Where a CHHSL or RSL screening value does not exist, detected concentrations will be compared to San Francisco Regional Water Quality Control Board Environmental Screening Levels (ESLs) Shallow Soil Screening Levels (less than 3 meters bgs), Commercial/Industrial land use where groundwater is not a current or potential drinking water source.

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The approved Workplan indicated that detected concentrations of PAHs, OCPs, and metals in the water sample would be compared to California maximum contaminant levels (MCLs), where established.

The analytical results for the soil and groundwater samples are included in Tables 1 through 5. At the top of each table, the appropriate screening levels are shown in the same units as the analytical results, whether the level is based on carcinogenic or non-carcinogenic risk, and a reference to the relevant promulgating agency.

As discussed above, the February 2, 2009 PAH data were the first-order risk driver for the project, with several analytes reportedly exceeding screening criteria. Minor exceedances of screening criteria for a few OCP analytes occurred in some samples, although most of these were based on J-flagged values (i.e., below method reporting limits) or their relative percent differences from duplicate samples were greater than 40 percent. Also as typically is the case in California, arsenic also exceeded screening criteria in all samples, including background samples. The inadvertent tabulation of ug/kg PAH and OCP data with units of mg/kg resulted in apparent exceedances of these screening criteria. Included in Attachment 4 is a letter from CH2M HILL acknowledging this error and presenting a revised Table 1 showing that the PAH and OCP data do not exceed the screening criteria.

In CH2M HILL's original and revised Table 1, the reported exceedance of the hexavalent chromium screening criteria (37 mg/kg) by the February 2, 2009 total chromium concentrations is overly conservative and somewhat misleading. Total chromium includes both trivalent and hexavalent chromium. The normal ratio of these isotopes is 6:1, respectively. The USEPA soil screening levels include an RSL for total chromium, which is 1,400 mg/kg (Table ?). None of detected concentrations of total chromium exceed this RSL, therefore no risk is present from total chromium. Thus with the corrected units for PAHs and OCPs and the appropriate RSL for chromium, none of PAHs, OCPs, or metals exceed the screening levels except for arsenic, which is discussed below.

Arsenic detected in February 2, 2009 characterization samples ranged from 2.35 to 6.91 mg/kg while background samples ranged from 3.85 to 3.94 mg/kg. Arsenic in the PEA samples ranged from 1.7 to 11 mg/kg while PEA background samples ranged from 2.8 to 7.7 mg/kg. As documented in several published studies, arsenic soil concentrations in California very commonly exceed risk-based screening levels. All arsenic soil concentrations detected in both the February 2, 2009 Phase II and in the PEA samples (and background samples) exceed screening levels. This is because of the common occurrence of arsenic bearing rocks in both the Sierra Nevada and Coastal Range mountains and other source terranes throughout California. For example, the various carcinogenic risk-based screening levels for arsenic in industrial soils range from 0.24 mg/kg (CHHSL) to 1.6 mg/kg (RSL), while naturally-occurring concentrations of arsenic in soil typically exceed this concentration throughout the Bay Area (RWQCB-SFR, 2007). Data presented in a report entitled *Background Concentrations of Trace and Major Elements in California Soils* (Bradford et. al, 1996) indicate that arsenic concentrations in California range from 0.59 to 11 mg/kg with a mean of 3.54 mg/kg (RWQCB-SFR, 2007). An additional study entitled *Element*

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Concentrations in Soils and Other Surficial Materials of the Conterminous United States also collected samples in the San Francisco Bay region (Shacklette and Boerngen, 1984) for which arsenic concentrations ranged from 16 to 97 mg/kg. Cal EPA does not generally require cleanup of naturally-occurring chemicals to less than background. Therefore, the arsenic soil concentrations are similar to background concentrations and do not warrant any mitigation.

The PEA analytical results (Table 1 through 5) confirm the conclusion based on the revised CH2M HILL February 2, 2009 investigation data set that there is no evidence of risk to human health present at the Site. As shown in Table 1 though 5, none of the detected concentrations of PAHs (Table 1), OCPs (Table 2), metals (except arsenic) (Table 3), and TPH (Table 4) in any of the samples exceeded their respective screening levels. The four samples analyzed for VOCs (Table 5) did not contain any analytes detected above method reporting limits.

The groundwater sample collected from onsite monitoring well WSM-3 did not contain any detectable concentrations of PAHs or OCPs. Metals in this sample were either not detected above method reporting limits or detected concentrations were below California MCLs, where established.

CONCLUSIONS AND RECOMMENDATIONS

A PEA was conducted at the proposed LEC site at the request of the CEC, based on the results of a Phase I ESA and a February 2, 2009 Phase II ESA conducted for NCPA. Following completion of the field investigation phase of the PEA, it was discovered that the February 2, 2009 PAH and OCP part per billion data had been inadvertently presented in units of parts per million, thereby increasing actual concentrations by a factor of one thousand. This error resulted in what appeared to be significant risk to human health, where in fact, none was present. The PEA characterized the LEC site with 20 borings and 44 soil samples analyzed for PAHs, OCPs, metals, TPH, and VOCs confirming that the soils do not pose a risk to human health and safety. Stantec concludes that no additional characterization is warranted, and no remediation is necessary to safely complete the construction of the proposed LEC facility.

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Lodi, California

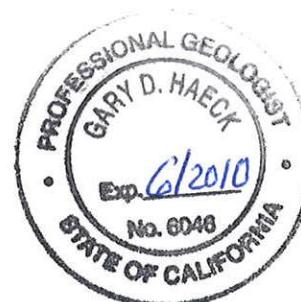
Should you have any questions or concerns regarding this report, please feel free to contact me.

Sincerely,

STANTEC CONSULTING CORPORATION

Sandra Pimienta, P.G.
Associate Geologist

Gary D. Haeck, Ph.D., P.G.
Managing Senior Geologist
Tel: (916) 384-0768
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Gary.Haeck@Stantec.com



Enclosures: **Figures**

- Figure 1 Site Location Map
Figure 2 Site Plan

Tables

- Table 1 Polycyclic Aromatic Hydrocarbons
Table 2 Organochlorine Pesticides
Table 3 Metals
Table 4 Total Petroleum Hydrocarbons
Table 5 Volatile Organic Compounds

Attachments

- Attachment 1 Soil Boring Permit
Attachment 2 Laboratory Analytical Reports, Chain Of Custody Documentation, and
Laboratory Level III QA/QC Documentation
Attachment 3 Non-Hazardous Waste Manifests
Attachment 4 CH2M HILL October 6, 2009 Letter to DTSC, and
Revised Table 1, Summary of Soil Analytical Results

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Reference: Preliminary Endangerment Assessment
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REFERENCES CITED

Bradford et. al, 1996. *Background Concentrations of Trace and Major Elements in California Soils*, Kearney Foundation special Report, UC-Riverside and CAL_EPA DTSC, March 1996.

CH2M HILL, 2009. Memorandum entitled *NCPA Lodi Preliminary Phase II ESA Sample Results*, February 26, 2009.

DTSC, 1994. *Preliminary Endangerment Assessment Guidance Manual*, State of California, Environmental Protection Agency, Department of Toxic Substances Control, January 1994.

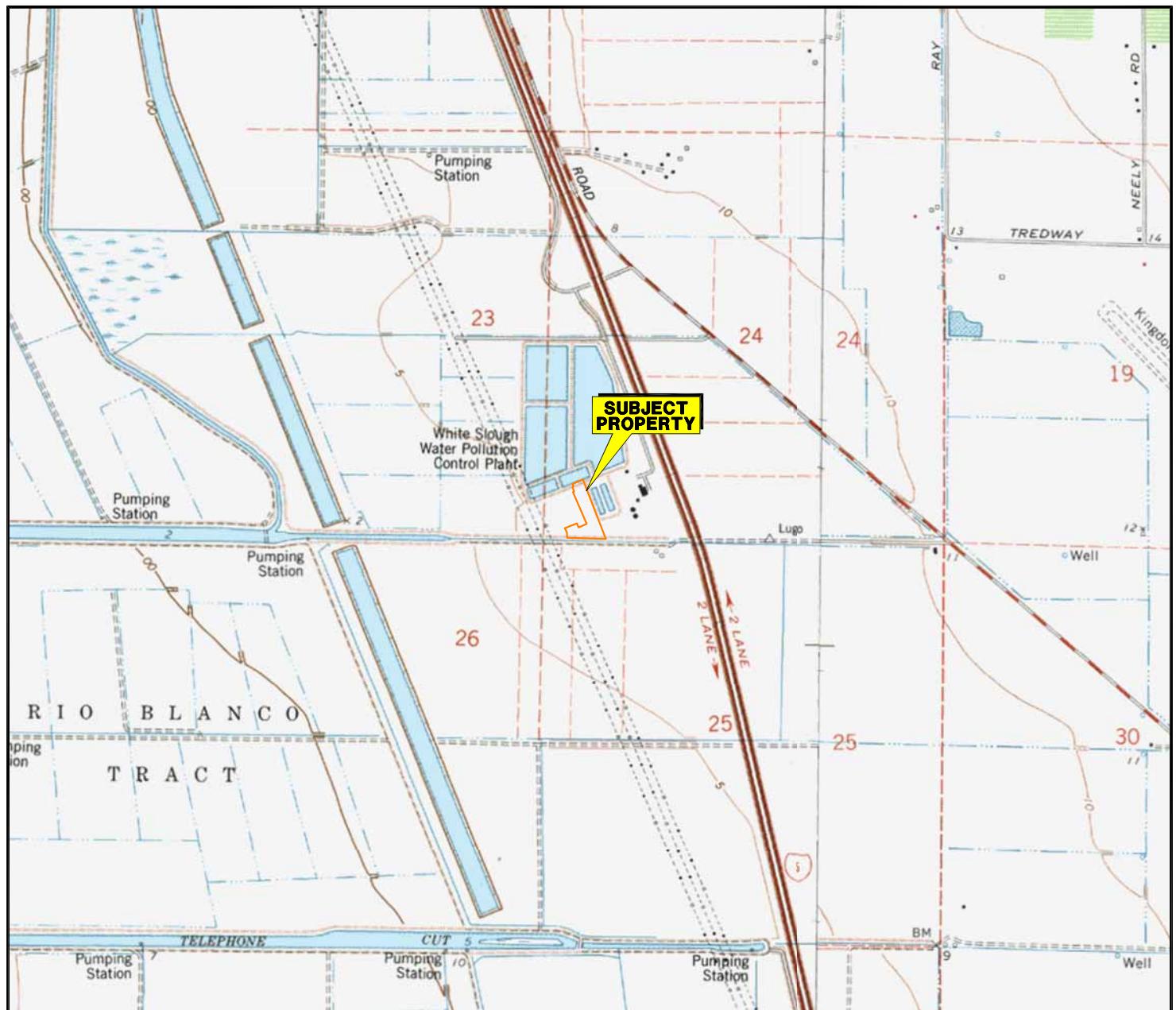
RWQCB-SFR, 2007/2008. *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater*, Regional Water Quality Control Board, San Francisco Bay Area Region, November 2007, updated May 2008.

Shacklette, H.T. and J. T. Boerngen, 1984. *Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States*, USGS Professional Paper 1270,

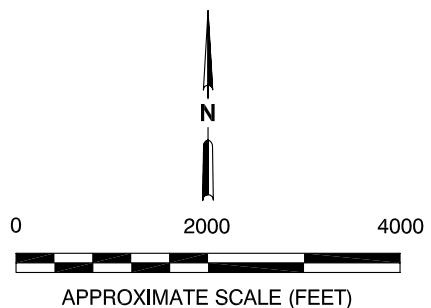
Stantec, 2009. *Preliminary Endangerment Assessment Workplan, Proposed Lodi Energy Center Site, 12745 N. Thornton Road, Lodi, California 95240*, August 13, 2009

US EPA, 2009. *Regional Screening Levels (RSL) for Chemical Contaminants at Superfund Sites*, United States Environmental Protection Agency, Region 9, April 2009

FIGURES



SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAPS, TERMINOUS QUADRANGLE, 1978
PHOTOREVISED 1993
LODI SOUTH QUADRANGLE, 1968
PHOTOREVISED 1976

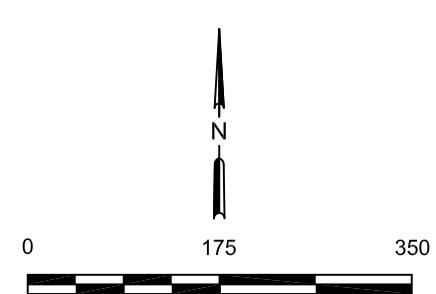


 Stantec 290 Conejo Ridge Avenue Thousand Oaks, CA 91361 (805) 230-1266/230-1277 (Fax)	FOR:	SITE LOCATION MAP		FIGURE:
	LODI ENERGY CENTER 12745 North Thornton Road Lodi, CA 95240			1
	JOB NUMBER: 185702076	DRAWN BY: R. Roman	CHECKED BY: C. Confar	APPROVED BY: C. Confar
				DATE: 08/04/09



LEGEND

- WSM-3 ● EXISTING GROUNDWATER MONITORING WELL
- 07 ⊖ PREVIOUS SHALLOW SOIL SAMPLE LOCATIONS (CH2MHILL)
- PROPOSED LAYDOWN AND/OR PARKING AREAS
- PROPOSED PLANT SITE
- 8 ● SOIL BORING LOCATIONS (STANTEC)
- BG4 ● BACKGROUND SOIL SAMPLING LOCATIONS



REFERENCE: THIS FIGURE IS BASED ON AN AERIAL SURVEY
PROVIDED BY MORROW SURVEYING

APPROXIMATE SCALE IN FEET

FOR:

LODI ENERGY CENTER
12745 NORTH THORNTON ROAD
LODI, CALIFORNIA

SITE PLAN

FIGURE:

2



Stantec

JOB NUMBER:
185702098

DRAWN BY:
MDR/R. ROMAN

CHECKED BY:
GH

APPROVED BY:
CC

DATE:
08/21/09

TABLES

Table 1
Polycyclic Aromatic Hydrocarbons
LEC PEA
Lodi, California

Table 1
Polycyclic Aromatic Hydrocarbons
LEC PEA
Lodi, California

Sample ID	Sample Date	Reporting Units	\Acenaphthene	\Acenaphthylene	Anthracene	Benzo[a]anthracene	Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[g,h,i]perylene	Benzo[k]fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	Naphthalene	Phenanthrene	Pyrene
Risk Based Screening Levels	NA	ug/kg	3.1E+06	1.1E+07	1.7E+08	2.2E+03	1.3E+02	2.1E+03	3.3E+06	2.1E+04	2.1E+05	2.1E+02	2.2E+07	2.2E+07	2.1E+03	2.0E+04	3.3E+06	1.7E+07
Agency and Risk Type	NA		rsl/nc	esl/nc	rsl/nc	rsl/c	chhs/c	rsl/c	esl/nc	rsl/c	rsl/c	rsl/nc	rsl/nc	rsl/nc	rsl/c	esl/nc	rsl/nc	
B-23-2	9/1/2009	ug/kg	<27	<27	<27	<27	<27	<27	<27	<27	<27	31	<27	<27	<27	<27	<27	29
B-23-6	9/1/2009	ug/kg	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7
B-24-2	9/1/2009	ug/kg	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2
B-24-6	9/1/2009	ug/kg	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9
B-25-2	9/1/2009	ug/kg	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5
B-25-6	9/1/2009	ug/kg	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1
B-26-2	9/1/2009	ug/kg	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6	<5.6
B-26-6	9/1/2009	ug/kg	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0	<6.0
B-27-2	9/1/2009	ug/kg	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9
B-27-6	9/1/2009	ug/kg	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1	<6.1
Background Samples																		
BG-4-2	9/2/2009	ug/kg	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3
BG-4-4	9/2/2009	ug/kg	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8
BG-4-6	9/2/2009	ug/kg	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9	<5.9
BG-5-2	9/2/2009	ug/kg	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5
BG-5-4	9/2/2009	ug/kg	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8
BG-5-6	9/2/2009	ug/kg	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8	<5.8
BG-6-2	9/2/2009	ug/kg	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2	<5.2
BG-6-4	9/2/2009	ug/kg	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3
BG-6-6	9/2/2009	ug/kg	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1	<5.1
BG-7-2	9/2/2009	ug/kg	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3	<5.3
BG-7-4	9/2/2009	ug/kg	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4	<5.4
BG-7-6	9/2/2009	ug/kg	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5	<5.5
Water Sample																		
WSM-3	09/02/2009	ug/L	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10

Notes:

NA = Not Applicable

ug/kg = micrograms per kilogram

ug/L = micrograms per liter

c = cancer nc = noncancer

BOLD numbers are detections above method reporting limits

chhs = California Environmental Protection Agency, California Human Health Screening Levels for Soil, January 2005

rsl = United States Environmental Protection Agency Regional Screening Level, April 2009

esl = San Francisco Bay Regional Water Quality Control Board, Environmental Screening Levels, November 2007

Table 2
Organochlorine Pesticides
LEC PEA
Lodi, California

Table 2
Organochlorine Pesticides
LEC PEA
Lodi, California

Sample ID	Sample Date	Reporting Units	Aldrin	Dieldrin	Endrin aldehyde	Endrin	Endrin ketone	Heptachlor	Heptachlor epoxide	4,4'-DDT	4,4'-DBE	4,4'-DDD	Endosulfan I	Endosulfan II	alpha-BHC	beta-BHC	gamma-BHC (lindane)	delta-BHC	Endosulfan sulfate	Methoxychlor	Toxaphene	Chlordane (technical)	alpha-Chlordane	gamma-Chlordane
Risk Based Screening Levels	NA	ug/kg	1.3E+02	1.1E+02	2.3E+02	2.3E+02	2.3E+02	5.2E+02	1.9E+02	6.3E+03	6.3E+03	9.0E+02	3.7E+06	3.7E+06	2.0E+03	2.0E+03	2.0E+03	3.7E+06	3.8E+06	1.8E+03	1.7E+03	1.7E+03	1.7E+03	
Agency and Risk Type	NA		chhs/c	rsl/c	chhs/nc	chhs/nc	chhs/nc	chhs/c	rsl/c	chhs/c	chhs/c	rsl/nc	rsl/nc	chhs/nc	chhs/nc	chhs/nc	chhs/nc	chhs/nc	chhs/nc	chhs/c	chhs/c	chhs/c	chhs/c	
B-23-2	9/1/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	2.3	<2.1	<2.1	5.3	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<42	<42	<2.1	<2.1	<2.1	
B-23-6	9/1/2009	ug/kg	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<45	<45	<2.3	<2.3	<2.3	
B-24-2	9/1/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<41	<41	<2.1	<2.1	<2.1	
B-24-6	9/1/2009	ug/kg	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<47	<47	<2.3	<2.3	<2.3	
B-25-2	9/1/2009	ug/kg	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<44	<44	<2.2	<2.2	<2.2	
B-25-6	9/1/2009	ug/kg	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<48	<48	<2.4	<2.4	<2.4	
B-26-2	9/1/2009	ug/kg	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<45	<45	<2.2	<2.2	<2.2	
B-26-6	9/1/2009	ug/kg	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<48	<48	<2.4	<2.4	<2.4	
B-27-2	9/1/2009	ug/kg	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4	<47	<47	<2.4	<2.4	<2.4	
B-27-6	9/1/2009	ug/kg	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<49	<49	<2.5	<2.5	<2.5	
Background Samples																								
BG-4-2	9/2/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<42	<42	<2.1	<2.1	<2.1	
BG-4-4	9/2/2009	ug/kg	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<47	<47	<2.3	<2.3	<2.3	
BG-4-6	9/2/2009	ug/kg	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<47	<47	<2.3	<2.3	<2.3	
BG-5-2	9/2/2009	ug/kg	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<44	<44	<2.2	<2.2	<2.2	
BG-5-4	9/2/2009	ug/kg	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<47	<47	<2.3	<2.3	<2.3	
BG-5-6	9/2/2009	ug/kg	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<2.3	<46	<46	<2.3	<2.3	<2.3	
BG-6-2	9/2/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<41	<41	<2.1	<2.1	<2.1	
BG-6-4	9/2/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<43	<43	<2.1	<2.1	<2.1	
BG-6-6	9/2/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<41	<41	<2.1	<2.1	<2.1	
BG-7-2	9/2/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<43	<43	<2.1	<2.1	<2.1	
BG-7-4	9/2/2009	ug/kg	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<2.1	<43	<43	<2.1	<2.1	<2.1	
BG-7-6	9/2/2009	ug/kg	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<2.2	<43	<43	<2.2	<2.2	<2.2	
Water Sample																								
WSM-3	09/02/2009	ug/L	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<0.061	<1.0	<0.061	<0.061	<0.061	<0.061	

Notes:

NA = Not Applicable

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ug/L = micrograms per liter

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BOLD numbers are detections above method reporting limits

chhs = California Environmental Protection Agency, California Human Health Screening Levels for Soil, January 2005

rsl = United States Environmental Protection Agency Regional Screening Level, April 2009

Table 3
Metals
LEC PEA
Lodi, California.

Sample ID	Sample Date	Reporting Units	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Risk Based Screening Levels	NA	mg/kg	3.8E+02	2.4E-01	6.3E+04	1.7E+03	7.5E+00	1.4E+03	3.2E+03	3.8E+04	3.5E+03	1.8E+02	4.8E+03	1.6E+04	4.8E+03	4.8E+03	6.3E+01	6.7E+03	1.0E+05
Agency and Risk Type	NA	NA	chhs1/nc	chhs1/c	chhs1/nc	chhs1/nc	rsl/c	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc	chhs1/nc
B-8-0.5	09/01/09	mg/kg	<11	<5.3	100	<3.2	<5.3	21	5.3	17	9.1	0.046	<11	14	<11	<5.3	<5.3	40	<110
B-8-2	09/01/09	mg/kg	<11	<5.7	100	<3.4	<5.7	15	<5.7	19	<5.7	<0.023	<11	<11	<11	<5.7	<5.7	38	<110
B-8-6	09/01/09	mg/kg	<5.9	<3.0	220	<1.8	<3.0	30	9.9	18	4.6	<0.024	<5.9	18	<5.9	<3.0	<3.0	66	<59
B-9-0.5	09/02/2009	mg/kg	<1.1	2.2	87	<0.32	<0.53	12	6.9	12	4.6	0.024	<1.1	10	<1.1	<0.53	<0.53	34	30
B-9-2	09/02/2009	mg/kg	<5.5	4.2	120	<1.7	<2.8	21	5.4	27	15	0.14	<5.5	20	<5.5	<2.8	<2.8	40	96
DUP B-9-2	09/02/2009	mg/kg	<5.6	<2.8	96	<1.7	<2.8	18	4.9	19	11	0.086	<5.6	17	<5.6	<2.8	<2.8	32	57
B-9-6	09/02/2009	mg/kg	<1.1	2.8	190	0.50	<0.57	17	12	16	5.5	0.026	<1.1	13	<1.1	<0.57	<0.57	70	66
B-10-0.5	09/02/2009	mg/kg	<5.3	3.1	87	<1.6	<2.7	13	5.6	16	5.1	<0.021	<5.3	14	<5.3	<2.7	<2.7	35	<53
B-10-2	09/02/2009	mg/kg	<1.1	1.8	91	<0.32	<0.54	12	5.6	10	2.8	<0.021	<1.1	8.6	<1.1	<0.54	<0.54	43	26
B-10-6	09/02/2009	mg/kg	<1.1	1.7	61	<0.32	<0.53	8.3	4.0	8.6	1.9	<0.021	<1.1	5.1	<1.1	<0.53	<0.53	35	24
B-11-0.5	09/02/2009	mg/kg	<5.3	4.3	120	<1.6	<2.7	19	7.1	17	6.2	0.056	<5.3	17	<5.3	<2.7	<2.7	45	<53
B-11-2	09/02/2009	mg/kg	<5.4	2.7	110	<1.6	<2.7	17	5.2	19	10	0.024	<5.4	17	<5.4	<2.7	<2.7	32	55
B-11-6	09/02/2009	mg/kg	<5.4	3.3	130	<1.6	<2.7	18	6.5	15	5.1	0.029	<5.4	14	<5.4	<2.7	<2.7	60	<54
B-12-2	09/02/2009	mg/kg	<5.3	3.0	170	<1.6	<2.6	16	6.0	15	3.3	0.027	<5.3	11	<5.3	<2.6	<2.6	48	<53
B-12-6	09/02/2009	mg/kg	<1.1	2.3	70	<0.34	<0.57	14	5.6	13	2.7	<0.023	<1.1	9.3	<1.1	<0.57	<0.57	57	31
B-13-2	09/01/09	mg/kg	<11	<5.5	110	<3.3	<5.5	23	7.4	16	7.3	0.041	<11	18	<11	<5.5	<5.5	49	<110
B-13-6	09/01/09	mg/kg	<5.9	<3.0	220	<1.8	<3.0	30	9.9	18	4.6	<0.024	<5.9	18	<5.9	<3.0	<3.0	66	<59
B-14-2	09/02/2009	mg/kg	<5.4	5.3	110	<1.6	<2.7	16	7.0	15	4.4	0.027	<5.4	13	<5.4	<2.7	<2.7	59	<54
B-14-6	09/02/2009	mg/kg	<6.0	11	630	<1.8	<3.0	49	29	79	15	<0.024	<6.0	48	<6.0	<3.0	<3.0	200	220
B-15-2	09/02/2009	mg/kg	<5.4	<2.7	99	<1.6	<2.7	13	4.5	9.4	5.0	<0.021	<5.4	6.4	<5.4	<2.7	<2.7	27	<54
B-15-6	09/02/2009	mg/kg	<5.6	3.0	90	<1.7	<2.8	14	6.2	12	3.6	<0.022	<5.6	8.9	<5.6	<2.8	<2.8	55	<56
B-16-2	09/02/2009	mg/kg	<5.6	<2.8	94	<1.7	<2.8	17	6.6	14	4.1	<0.021	<5.6	10	<5.6	<2.8	<2.8	48	<56
DUP B-16-2	09/02/2009	mg/kg	<5.7	<2.8	140	<1.7	<2.8	16	5.2	11	3.6	<0.023	<5.7	7.2	<5.7	<2.8	<2.8	34	<57
B-16-6	09/02/2009	mg/kg	<6.2	<3.1	89	<1.9	<3.1	17	6.5	13	3.6	<0.025	<6.2	9.9	<6.2	<3.1	<3.1	46	<62
B-17-2	09/02/2009	mg/kg	<5.5	<2.7	94	<1.6	<2.7	15	5.6	11	3.4	0.022	<5.5	7.9	<5.5	<2.7	<2.7	41	<55
B-17-6	09/02/2009	mg/kg	<5.3	<2.7	57	<1.6	<2.7	10	4.5	8.5	<2.7	<0.021	<5.3	5.8	<5.3	<2.7	<2.7	37	<53
B-18-2	09/01/09	mg/kg	<11	<5.6	120	<3.4	<5.6	26	7.9	23	14	0.045	<11	120	<11	<5.6	<5.6	50	310
B-18-6	09/01/09	mg/kg	<12	<6.2	150	<3.8	<6.2	46	9.2	13	<6.2	<0.025	<12	15	<12	<6.2	<6.2	63	<120
B-19-2	09/01/09	mg/kg	<11	<5.5	160	<3.3	<5.5	22	8.5	14	<5.5	<0.023	<11	<11	<11	<5.5	<5.5	53	<110
B-19-6	09/01/09	mg/kg	<5.9	<2.9	150	<1.8	<2.9	17	8.1	17	5.5	<0.022	<5.9	10	<5.9	<2.9	<2.9	56	<59
B-20-2	09/01/09	mg/kg	<11	<5.6	170	<3.4	<5.6	13	<5.6	11	<5.6	<0.022	<11	<11	<11	<5.6	<5.6	45	<110
B-20-6	09/01/09	mg/kg	<5.5	<2.8	83	<1.7	<2.8	13	5.7	12	3.0	<0.022	<5.5	7.2	<5.5	<2.8	<2.8	50	<55
B-21-2	09/01/09	mg/kg	<5.4	<2.7	140	<1.6	<2.7	19	5.6	10	3.3	<0.021	<5.4	7.3	<5.4	<2.7	<2.7	39	<54
DUP B-21-2	09/01/09	mg/kg	<11	<5.4	120	<3.2	<5.4	18	6.3	13	<5.4	<0.022	<11	<11	<11	<5.4	<5.4	44	<110
B-21-6	09/01/09	mg/kg	<6.2	<3.1	180	<1.9	<3.1	17	11	23	5.6	0.034	<6.2	11	<6.2	<3.1	<3.1	58	70
B-22-2	09/01/09	mg/kg	<11	<5.4	150	<3.2	<5.4	21	7.5	18	<5.4	<0.022	<11	12	<11	<5.4	<5.4	52	<110
B-22-6	09/01/09</																		

Table 3
Metals
LEC PEA
Lodi, California.

Sample ID	Sample Date	Reporting Units	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Risk Based Screening Levels	NA	mg/kg	3.8E+02	2.4E-01	6.3E+04	1.7E+03	7.5E+00	1.4E+03	3.2E+03	3.8E+04	3.5E+03	1.8E+02	4.8E+03	1.6E+04	4.8E+03	4.8E+03	6.3E+01	6.7E+03	1.0E+05
Agency and Risk Type	NA	NA	chhsl/nc	chhsl/c	chhsl/nc	chhsl/nc	rsl/c	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc	chhsl/nc
B-23-2	09/01/09	mg/kg	<5.4	<2.7	81	<1.6	<2.7	31	5.9	12	3.2	<0.021	<5.4	7.6	<5.4	<2.7	<2.7	57	<54
B-23-6	09/01/09	mg/kg	<5.7	<2.8	190	<1.7	<2.8	24	7.9	16	3.9	<0.022	<5.7	13	<5.7	<2.8	<2.8	58	<57
B-24-2	09/01/09	mg/kg	<10	<5.2	110	<3.1	<5.2	18	5.5	17	8.2	<0.022	<10	13	<10	<5.2	<5.2	45	<100
B-24-6	09/01/09	mg/kg	<5.9	<2.9	85	<1.8	<2.9	18	6.5	11	3.4	<0.023	<5.9	12	<5.9	<2.9	<2.9	53	<59
B-25-2	09/01/09	mg/kg	<11	<5.5	150	<3.3	<5.5	24	7.7	20	11	0.082	<11	18	<11	<5.5	<5.5	54	<110
B-25-6	09/01/09	mg/kg	<6.1	<3.0	92	<1.8	<3.0	29	3.9	21	18	0.073	<6.1	37	<6.1	<3.0	<3.0	40	120
B-26-2	09/01/09	mg/kg	42	<5.6	170	<3.4	<5.6	19	7.4	13	<5.6	<0.023	<11	<11	<11	<5.6	<5.6	52	<110
B-26-6	09/01/09	mg/kg	<1.2	<3.0	110	<1.8	<0.61	14	6.2	14	3.2	<0.023	<1.2	7.3	<1.2	<0.61	<0.61	46	<61
B-27-2	09/01/09	mg/kg	<1.2	4.5	200	<1.8	<0.60	25	9.2	17	4.6	<0.025	<1.2	12	<1.2	<0.60	<0.60	66	<60
B-27-6	09/01/09	mg/kg	<1.2	2.7	130	<0.37	<0.62	10	8.2	16	3.9	<0.024	<1.2	10	<1.2	<0.62	<0.62	43	51
Background Samples																			
BG-4-2	09/02/2009	mg/kg	<5.3	<2.7	120	<1.6	<2.7	19	7.5	17	4.8	0.021	<5.3	12	<5.3	<2.7	<2.7	41	<53
BG-4-6	09/02/2009	mg/kg	<5.9	4.1	120	<1.8	<2.9	14	8.4	16	4.3	<0.024	<5.9	9.9	<5.9	<2.9	<2.9	51	<59
BG-5-2	09/02/2009	mg/kg	<5.6	6.4	280	<1.7	<2.8	28	12	20	6.6	<0.023	<5.6	18	<5.6	<2.8	<2.8	84	73
BG-5-6	09/02/2009	mg/kg	<5.8	7.7	130	<1.7	<2.9	13	7.8	17	4.6	0.025	<5.8	8.1	<5.8	<2.9	<2.9	54	<58
BG-6-2	09/02/2009	mg/kg	<5.2	4.3	150	<1.6	<2.6	17	7.4	13	3.9	<0.021	<5.2	11	<5.2	<2.6	<2.6	63	<52
BG-6-6	09/02/2009	mg/kg	<5.2	2.8	59	<1.5	<2.6	8.0	4.8	9.4	<2.6	<0.020	<5.2	<5.2	<5.2	<2.6	<2.6	42	<52
BG-7-2	09/02/2009	mg/kg	<5.3	3.6	160	<1.6	<2.7	21	9.5	16	5.0	<0.021	<5.3	13	<5.3	<2.7	<2.7	69	55
BG-7-6	09/02/2009	mg/kg	<5.5	3.2	84	<1.7	<2.8	12	6.3	13	<2.8	<0.021	<5.5	5.9	<5.5	<2.8	<2.8	57	<55
Water Sample																			
WSM-3	09/02/2009	ug/L	<2.0	6.1	140	<0.50	<1.0	<2.0	1.1	2.3	<1.0	<0.20	3.1	<2.0	3.5	<1.0	<1.0	42	<20

Notes:

NA = Not Applicable

mg/kg = milligrams per kilogram

ug/L = micrograms per liter

c = cancer nc = noncancer

BOLD numbers are detections above method reporting limits

chhsl = California Environmental Protection Agency, California Human Health Screening Levels for Soil, January 2005

rsl = United States Environmental Protection Agency Regional Screening Level, April 2009

= Concentrations above screening level

Table 4
Total Petroleum Hydrocarbons
LEC PEA
Lodi, California

Sample ID	Sample Date	Reporting Units	Motor Oil Range Organics [C24-C36]	Diesel Range Organics [C10-C28]	Gasoline Range Organics [C5-C12]
Risk Based Screening Levels	NA	mg/kg	2.5E+03	1.8E+02	1.8E+02
Agency and Risk Type	NA		esl/nc	esl/nc	esl/nc
B-8-0.5	9/1/2009	mg/kg	<53	3.7	<0.24
B-8-2	9/1/2009	mg/kg	<56	<1.1	<0.23
B-8-6	9/1/2009	mg/kg	<59	<1.2	<0.28
B-9-0.5	9/2/2009	mg/kg	<53	4.4	<0.26
B-9-2	9/2/2009	mg/kg	<55	8.0	<0.26
DUP B-9-2	9/2/2009	mg/kg	<55	2.7	<0.28
B-9-6	9/2/2009	mg/kg	<57	<1.1	<0.28
B-10-0.5	9/2/2009	mg/kg	<53	1.4	<0.26
B-10-2	9/2/2009	mg/kg	<53	<1.1	<0.26
B-10-6	9/2/2009	mg/kg	<53	<1.1	<0.26
B-11-0.5	9/2/2009	mg/kg	57	13	<0.26
B-11-2	9/2/2009	mg/kg	<53	9.0	<0.27
B-11-6	9/2/2009	mg/kg	<54	4.1	<0.27
B-12-2	9/2/2009	mg/kg	<52	<1.0	<0.25
B-12-6	9/2/2009	mg/kg	<57	<1.1	<0.27
B-13-2	9/1/2009	mg/kg	<55	5.2	<0.25
B-13-6	9/1/2009	mg/kg	<59	<1.2	<0.27
B-14-2	9/2/2009	mg/kg	<54	3.6	<0.27
B-14-6	9/2/2009	mg/kg	<60	<1.2	<0.28
B-15-2	9/2/2009	mg/kg	<54	1.8	<0.27
B-15-6	9/2/2009	mg/kg	<56	<1.1	<0.27
B-16-2	9/2/2009	mg/kg	<56	3.1	<0.28
DUP B-16-2	9/2/2009	mg/kg	<57	<1.1	<0.28
B-16-6	9/2/2009	mg/kg	<61	<1.2	<0.30
B-17-2	9/2/2009	mg/kg	<55	1.5	<0.26
B-17-6	9/2/2009	mg/kg	<53	<1.1	<0.26
B-18-2	9/1/2009	mg/kg	<55	3.1	<0.23
B-18-6	9/1/2009	mg/kg	<62	<1.2	<0.28
B-19-2	9/1/2009	mg/kg	<55	<1.1	<0.24
B-19-6	9/1/2009	mg/kg	<58	<1.2	<0.25
B-20-2	9/1/2009	mg/kg	<55	<1.1	<0.25
B-20-6	9/1/2009	mg/kg	<55	<1.1	<0.24
B-21-2	9/1/2009	mg/kg	<53	<1.1	<0.26
DUP B-21-2	9/1/2009	mg/kg	<53	1.4	<0.23
B-21-6	9/1/2009	mg/kg	<62	<1.2	<0.31
B-22-2	9/1/2009	mg/kg	<54	<1.1	<0.26
B-22-6	9/1/2009	mg/kg	<55	<1.1	<0.27

Table 4
Total Petroleum Hydrocarbons
LEC PEA
Lodi, California

Sample ID	Sample Date	Reporting Units	Motor Oil Range Organics [C24-C36]	Diesel Range Organics [C10-C28]	Gasoline Range Organics [C5-C12]
Risk Based Screening Levels	NA	mg/kg	2.5E+03	1.8E+02	1.8E+02
Agency and Risk Type	NA		esl/nc	esl/nc	esl/nc
B-23-2	9/1/2009	mg/kg	190	33	<0.24
B-23-6	9/1/2009	mg/kg	<57	<1.1	<0.25
B-24-2	9/1/2009	mg/kg	<52	<1.0	<0.23
B-24-6	9/1/2009	mg/kg	<59	<1.2	<0.25
B-25-2	9/1/2009	mg/kg	<55	9.7	<0.27
B-25-6	9/1/2009	mg/kg	<61	14	<0.26
B-26-2	9/1/2009	mg/kg	<56	<1.1	<0.25
B-26-6	9/1/2009	mg/kg	<60	<1.2	<0.29
B-27-2	9/1/2009	mg/kg	<60	<1.2	<0.29
B-27-6	9/1/2009	mg/kg	<61	<1.2	<0.28
Background Samples					
BG-4-2	9/2/2009	mg/kg	<53	<1.1	<0.26
BG-4-6	9/2/2009	mg/kg	<58	<1.2	<0.29
BG-5-2	9/2/2009	mg/kg	<55	<1.1	<0.27
BG-5-6	9/2/2009	mg/kg	<58	<1.2	<0.28
BG-6-2	9/2/2009	mg/kg	<51	<1.0	<0.26
BG-6-6	9/2/2009	mg/kg	<52	<1.0	<0.25
BG-7-2	9/2/2009	mg/kg	<53	<1.1	<0.25
BG-7-6	9/2/2009	mg/kg	<55	<1.1	<0.27

Notes:

BOLD numbers are detections above method reporting limits

NA = Not Applicable

mg/kg = milligrams per kilogram

nc = noncancer

c = cancer

esl = San Francisco Bay Regional Water Quality Control Board, Environmental Screening Levels, November 2007

Table 5
Volatile Organic Compounds
LEC PEA
Lodi, California

Notes:

ug/kg = micrograms per kilogram

NR = Not requested

Table 5
Volatile Organic Compounds
LEC PEA
Lodi, California

Notes:

ug/kg = micrograms per kilogram

NR = Not requested

Table 5
Volatile Organic Compounds
LEC PEA
Lodi, California

Sample ID	Sample Date	Reporting Units	Dibromomethane	Dichlorobromomethane	Dichlorodifluoromethane	Ethylbenzene	Ethylene Dibromide	Hexachlorobutadiene	Isopropylbenzene	Methyl tert-butyl ether	Methylene Chloride	Naphthalene	n-Butylbenzene	N-Propylbenzene	sec-Butylbenzene	Styrene	tert-Butylbenzene	Tetrachloroethene	Toluene	trans-1,2-Dichloroethene	trans-1,3-Dichloropropene	Trichloroethene	Trichlorofluoromethane	Vinyl acetate	Vinyl chloride	Xylenes, Total	
B-8-0.5	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-8-2	9/1/2009	ug/kg	<9.4	<4.7	<9.4	<4.7	<4.7	<4.7	<4.7	<4.7	<9.4	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<4.7	<9.4
B-8-6	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-9-0.5	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-9-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
DUP B-9-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-9-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-10-0.5	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-10-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-10-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-11-0.5	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-11-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-11-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-12-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-12-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-13-2	9/1/2009	ug/kg	<9.9	<4.9	<9.9	<4.9	<4.9	<4.9	<4.9	<4.9	<9.9	<9.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	<9.9
B-13-6	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-14-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-14-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-15-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-15-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-16-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
DUP B-16-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-16-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-17-2	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-17-6	9/2/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-18-2	9/1/2009	ug/kg	<9.2	<4.6	<9.2	<4.6	<4.6	<4.6	<4.6	<4.6	<9.2	<9.2	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<4.6	<9.2
B-18-6	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-19-2	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-19-6	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-20-2	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-20-6	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-21-2	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
DUP B-21-2	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-21-6	9/1/2009	ug/kg	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
B-22-2	9/1/2009	ug/kg	<10	<5.2	<10	<5.2	<5.2	<5.2	<5.2	<10	<10	<															

ATTACHMENT 1
SOIL BORING PERMIT



SAN JOAQUIN COUNTY
ENVIRONMENTAL HEALTH DEPARTMENT
600 East Main Street, Stockton, CA 95202-3029
Telephone: (209) 468-3449 Fax: (209) 468-3433 Web: www.sjgov.org/ehd

**SITE
MITIGATION
UNIT IV**

**ENVIRONMENTAL
HEALTH
PERMIT/SERVICES**

NON-REFUNDABLE PERMIT EXPIRES 1 YEAR FROM DATE ISSUED

Application is hereby made to San Joaquin County for a permit to construct and/or install the work described. This application is made in compliance with San Joaquin County Development Title, chapter 9-1115.3 and the Standards of San Joaquin County Environmental Health Department.

Well Location 12751 N. Thornton Rd Cross Street Interstate 5 City Lodi Zip 95242 Assessor's Parcel # 055-130-16
Property Owner City of Lodi Address 1313 South Ham Lane City Lodi Zip 95240 Phone # (209) 333-6706
C-57 Contractor Gregg Drilling & Testing Address 950 Howe Rd City Martinez Lic # 48516 Phone (925) 313-5800
Consultant/Sub Cntr Stantec Consulting Address 3017 Kilgore Rd Ste 100 City Rancho Cordova Lic # 654498 Phone (916) 861-0400
GIS Coordinates: X 6306742.51 Y 2219663.77, Township _____ Range _____ Section 25

WORK TO BE PERFORMED:

- NEW WELL/BORING (CPT, GEOPROBE, HYDROPUCH, HAND-AUGER, OTHER)
 SOIL BORING# 24
 WELL # _____
 *OTHER _____

- DESTRUCTION (CHOOSE TYPE BELOW)
 OVER-BORE DIAMETER _____
 PRESSURE GROUT _____
 GROUT SPECIFICATIONS _____

COMMENTS: _____

TYPE OF WELL	INSTALLATION TYPE	CONSTRUCTION SPECIFICATIONS
<input type="checkbox"/> MONITORING	<input type="checkbox"/> HOLLOW STEM	DIA. OF BOREHOLE <u>2.5 in</u> <input type="checkbox"/> MULTIPLE CASINGS <input type="checkbox"/> MULTI-LEVEL WELL CASING DIA: _____
<input type="checkbox"/> EXTRACTION	<input type="checkbox"/> AIR HAMMER/DRIVEN	CASING THICKNESS _____ TYPE OF CASING: <input type="checkbox"/> STEEL <input type="checkbox"/> PVC <input type="checkbox"/> OTHER _____
<input type="checkbox"/> VAPOR	<input type="checkbox"/> MUD ROTARY	DEPTH OF GROUT SEAL _____ TREMIE TYPE TO BE USED <input type="checkbox"/> AUGERS <input type="checkbox"/> HOSE
<input type="checkbox"/> AIR SPARGE/OZONE	<input checked="" type="checkbox"/> PUSH POINT (GP OR CPT)	GROUT SEAL PUMPED: <input type="checkbox"/> Yes <input type="checkbox"/> No (NOTE: MAXIMUM FREE-FALL DEPTH IS 30') _____
<input type="checkbox"/> SOIL BORING	<input checked="" type="checkbox"/> HAND AUGER	GROUT SPECIFICATIONS <u>Neat portland cement</u>
<input type="checkbox"/> OTHER: _____	<input type="checkbox"/> OTHER: _____	APPROX. BORING DEPTH _____ <input type="checkbox"/> BOLTED TRAFFIC BOX OR <input type="checkbox"/> STOVE PIPE (If YES, list specifications in comment section)

COMMENTS: shallow sample depths and H&S requirements may preclude or limit use of mechanical drilling equipment

NOTE: OFFSITE BORINGS REQUIRE ACCESS AGREEMENT OR ENCROACHMENT PERMITS

48 WORKING HOURS NOTICE REQUIRED FOR INSPECTIONS

I hereby certify that I have prepared this application and that the work will be done in accordance with San Joaquin County Ordinances, Rules and Regulations, and all applicable California Laws.

Signed Larry Braybrooks Title/Company Geologic Project Specialist/Stantec
Print Name Larry Braybrooks Date 8/19/09

DEPARTMENT USE ONLY

SITE MAP IN UNIT IV FILE, ADDRESS: 12751 Thornton Rd, Lodi

WORK PLAN DATED: 8/13/09 DATE ISSUED 8/21/09 AREA 5611

APPLICATION ACCEPTED BY Frank Giardini FINAL INSPECTION BY _____ DATE _____

GROUT INSPECTION BY _____ DATE _____

DESTRUCTION INSPECTION BY _____ DATE _____

COMMENTS/CONDITIONS: _____

ACCOUNTING ONLY:		AID #	FAC #				
PE CODES	FEES INFO	AMT REMITTED	CHECK #	RECV'D BY	DATE	PERMIT/SERVICE #	INVOICE
<u>2905</u>	<u>89.00</u>	<u>89.00</u>	<u>6501</u>	<u>102</u>	<u>8/21/09</u>	<u>SR# 58179</u>	

C-57 WC -WAIVER C-57 LETTER OF AUTHORIZATION TO SIGN PERMIT ENCROACHMENT DOC

Frank Giardini (209)-629-5119

ATTACHMENT 2

**LABORATORY ANALYTICAL REPORTS,
CHAIN OF CUSTODY DOCUMENTATION,
AND LABORATORY LEVEL III QA/QC DOCUMENTATION**

ATTACHMENT 3
NON-HAZARDOUS WASTE MANIFESTS

Manifest

TPST Soil Recyclers of CA
Non-Hazardous Soils

J Manifest # J

Generator and/or Consultant	Date of Shipment:	Responsible for Payment:	Transporter Truck #:	Facility #:	Given by TPST:	Load #	
	10/08/09		127	407	34075 1001		
	Generator's Name and Billing Address: CITY OF LODI ENERGY CENTER 12745 N. THORNTON ROAD LODI, CA 95242			Generator's Phone #:		Generator's US EPA ID No.:	
				Person to Contact:			
				FAX#:		Customer Account Number with TPST:	
	Consultant's Name and Billing Address:			Consultant's Phone #:			
				Person to Contact:			
				FAX#:		Customer Account Number with TPST:	
	Generation Site (Transport from): (name & address) CITY OF LODI ENERGY CENTER 12745 N. THORNTON ROAD LODI, CA 95242			Site Phone #:		BTEX Levels	
				Person to Contact:		TPH Levels	
FAX#:				Avg. Levels			
Designated Facility (Transport to): (name & address) TPST SOIL RECYCLERS OF CALIFORNIA 12328 HIBISCUS AVENUE ADELANTO, CA 92301			Facility Phone #:		Facility Permit Numbers		
			(800) 862-8001				
			Person to Contact: DELENA JEFFREY				
			FAX#: (780) 246-8004				
Transporter Name and Mailing Address: BELSHIRE 26971 TOWNE CENTRE DRIVE FOOTHILL RANCH, CA 92610			Transporter's Phone #:		Transporter's US EPA ID No.:		
			949-460-5200		CAR000182813		
			Person to Contact: LARRY MOOTHART		Transporter's DOT No.:		
			FAX#: 949-460-5211		Customer Account Number with TPST:		
Description of Soil	Moisture Content	Contaminated by:	Approx. Qty:	Description of Delivery	Gross Weight	Tare Weight	Net Weight
Sand <input type="checkbox"/> Organic <input type="checkbox"/> Clay <input type="checkbox"/> Other <input type="checkbox"/>	0 - 10% <input type="checkbox"/> 10 - 20% <input type="checkbox"/> 20% - over <input type="checkbox"/>	Gas <input type="checkbox"/> Diesel <input type="checkbox"/> Other <input type="checkbox"/>		Soil	1455		
Sand <input type="checkbox"/> Organic <input type="checkbox"/> Clay <input checked="" type="checkbox"/> Other <input type="checkbox"/>	0 - 10% <input type="checkbox"/> 10 - 20% <input type="checkbox"/> 20% - over <input type="checkbox"/>	Gas <input type="checkbox"/> Diesel <input type="checkbox"/> Other <input type="checkbox"/>			980	420	560
List any exception to items listed above: Scale Ticket# 74464 25							
Generator's and/or consultant's certification: I/We certify that the soil referenced herein is taken entirely from those soils described in the Soil Data Sheet completed and certified by me/us for the Generation Site shown above and nothing has been added or done to such soil that would alter it in any way.							
Print or Type Name:	Generator <input type="checkbox"/>	Consultant <input checked="" type="checkbox"/>	Signature and date:		Month	Day	Year
Bryan Rose			Bryan Rose		10	05	09
Transporter's certification: I/We acknowledge receipt of the soil described above and certify that such soil is being delivered in exactly the same condition as when received. I/We further certify that this soil is being directly transported from the Generation Site to the Designated Facility without off-loading, adding to, subtracting from or in any way delaying delivery to such site.							
Print or Type Name:	Ron Green Gary Gauvin		Signature and date:		Month	Day	Year
Ron Green Gary Gauvin			Ron Green Gary Gauvin		10	05	09
10-08-09							
Discrepancies							
Recycling Facility certifies the receipt of the soil covered by this manifest except as noted above:							
Print or Type Name:	D. JEFFREY/J PROVANSAL		Signature and date:		10-9-9		
D. JEFFREY/J PROVANSAL							

Please print or type.

NO. 856400

30

NON-HAZARDOUS WASTE DATA FORM

1. BESI #
172898

2. Generator's Name and Mailing Address CITY OF LODI ENERGY CENTER 12745 N. THORNTON ROAD LODI, CA 95242		Generator's Site Address (If different than mailing address) CITY OF LODI ENERGY CENTER 12745 N. THORNTON ROAD LODI, CA 95242			
Generator's Phone: 3. Transporter 1 Company Name BELSHIRE		24-HOUR EMERGENCY PHONE: 949-699-3708 Phone # 949-460-5200			
4. Transporter 2 Company Name NIETO & SONS TRUCKING, INC.		Phone # 714-880-0855			
5. Designated Facility Name and Site Address DEMENNO KERDOON 2000 N. ALAMEDA ST. COMPTON, CA 90222		Phone # 310-537-7100			
6. Waste Shipping Name and Description A. NON-HAZARDOUS WATER WELL PURGING / DECON WATER		7. Containers No. Type		8. Total Quantity	9. Unit Wt/Vol
B.		1	11 12m	10	6
C.					
D.					
11. Special Handling Instructions and Additional Information 1 drum removed from site * WASTE WAS TRANSPORTED BY VACUUM TRUCK TO THE DISPOSAL FACILITY *					
12. GENERATOR'S CERTIFICATION: I certify the materials described above on this data form are non-hazardous. Generator's/Offeror's Printed/Typed Name <u>Consultant Ryan Rose</u> Signature <u>Brian D</u> Month Day Year <u>10 05 09</u>					
13. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name <u>Ron Green</u> Signature <u>Ron Green</u> Month Day Year <u>10 05 09</u> Transporter 2 Printed/Typed Name <u>Elaine Martinez</u> Signature <u>ELM</u> Month Day Year <u>10 08 09</u>					
14. Designated Facility Owner or Operator: Certification of receipt of materials covered by this data form. Printed/Typed Name <u>Fernando Marquez</u> Signature <u>JUL 9/09</u> Month Day Year <u>10 08 09</u>					

TRANSPORTER #2

ATTACHMENT 4

CH2M HILL OCTOBER 6, 2009 LETTER TO DTSC AND

REVISED TABLE 1,

SUMMARY OF SOIL ANALYTICAL RESULTS



CH2M HILL
2485 Natomas Park Dr.
Suite 600
Sacramento, CA 95624
Tel 916.920.0212
Fax 916.920.8463

October 6, 2009

Maria Gillette
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Subject: Revision to NCPA Lodi Energy Center Preliminary Phase II ESA Sample Results (08-AFC-10)

Dear Ms. Gillette,

This letter is being transmitted with the revised Table 1 for the CH2M HILL technical memorandum "NCPA Lodi Energy Center Preliminary Phase II ESA Sample Results," dated February 26, 2009. An error was discovered in the original data summary table that is corrected in this version.

The error in the original Table 1 data summary occurred when the organics data for organochlorine (Org-Cl) pesticides and polycyclic aromatic hydrocarbons (PAHs) were transcribed from the original laboratory data reports into the summary spreadsheet. The organics data were not converted from the reported units ($\mu\text{g}/\text{kg}$) to the values that had been adopted for the entire data table (mg/kg). The table footnote stating that all concentration units were in mg/kg on a dry weight basis was, therefore, incorrect.

All of the organics data in the original Table 1 were off by a factor of 1,000 (ratio of μg to mg). This resulted in a number of samples being incorrectly classified as having exceeded the comparative screening criteria, as color coded in the original table. This conversion error was not caught in the review process.

The erroneous table entries lead to the incorrect conclusion that there was significant Org-Cl pesticides and PAH contamination present at the site. That conclusion then prompted actions to address these contamination issues (including remedial work planning, additional sampling, and regulatory interaction).

With this letter, CH2M HILL is providing a revised Table 1 for the report. The results now correctly indicate that there are no exceedances of the comparative criteria (USEPA PRGs, CHHSLs, ESLs, or Title 22 Hazardous Waste Criteria (Total Threshold Limit Concentrations) for Org-Cl pesticides and PAH constituents and, hence, no further action is required.

Ms. Maria Gillette

October 6, 2009

Page 2 of 2

We deeply regret any inconvenience this mistake has caused and look forward to supporting you in final resolution of this issue. Should you have any questions, please do not hesitate to contact me at (916) 286-0249.

Sincerely,

CH2M HILL



Sarah Madams

AFC Project Manager

Attachment

cc: A. Grenier/Greneir & Associates
E. Warner/NCPA
S. Schwabauer/City of Lodi
E. Townsend-Hough/CEC
R. Jones/CEC
C. Swimley/City of Lodi
G. Haeck/Stantec
L. Goldberg/Meyers Nave
S. Becker/DTSC

REVISED Table 1. Summary of Soil Analytical Results, Phase II Environmental Site Assessment, Lodi Energy Center, Lodi, California

Sample ID	PRGs ³ Industrial Soil (mg/kg)	CHHSL's ⁴ or ESLs ⁴ Industrial Soil (mg/kg)	TTL ⁵ Wet wt basis (mg/kg)	01-LEC-06	01-LEC-36	02-LEC-06	02-LEC-36	03-LEC-06	08-LEC-06	03-LEC-36	04-LEC-06	04-LEC-36	05-LEC-06	05-LEC-36	08-LEC-36	06-LEC-06	06-LEC-36	07-LEC-06	07-LEC-36	BG1-LEC06	BG1-LEC36	BG2-LEC06	BG2-LEC36	BG3-LEC06	BG3-LEC36	95% Upper Confidence Limit ⁶	
Metals by SW6010B																											
Antimony	410 n	380	500	0.19 U	0.78 J	0.60 J	0.23 J	1.26	1.70	0.21 U	NT	NT	NT	NT	NT	0.39 J	0.17 U	0.20 U	0.18 U	0.23 U	0.16 U	0.19 U	0.19 U	0.18 U	0.22 U	0.21	
Arsenic	1.6 c	0.24	500	3.51	4.71	5.86	2.35	6.59	6.91	1.18 U	NT	NT	NT	NT	NT	3.13	2.28 J	4.10	2.86	1.74 J	1.72 J	1.61 J	2.35 J	3.85	3.94	3.23	
Barium	190,000 nm	63,000	10,000	108	268	99.2	109	277	387	77.1	NT	NT	NT	NT	NT	133	116	93.3	110	98.7	94.4	101	88.3	103	104	103	
Beryllium	2,000 n	1,700	75	0.41	0.32 J	0.39 J	0.36	0.34 J	0.48	0.21 J	NT	NT	NT	NT	NT	0.42	0.36 J	0.26 J	0.26 J	0.36 J	0.36 J	0.34 J	0.31 J	0.41 J	0.42 J	0.40	
Cadmium	810 n	7.5	100	0.072 J	1.41	0.013 J	0.054 J	1.75	2.47	0.17 J	NT	NT	NT	NT	NT	0.17 J	0.16 J	0.0099 U	0.0094 U	0.010 U	0.0095 U	0.011 U	0.011 U	0.011 U	0.011 U	0.011 U	0.011
Chromium (based on III)	1,400 c	10,000	2,500	17.5	55.1	20.7	17.0	77.2	106	13.5	NT	NT	NT	NT	NT	19.5	19.9	15.1	17.1	11.8	12.0	13.7	12.0	12.5	12.9	13.0	
Chromium (based on VI)	200 c*	37	500	17.5	55.1	20.7	17.0	77.2	106	13.5	NT	NT	NT	NT	NT	19.5	19.9	15.1	17.1	11.8	12.0	13.7	12.0	12.5	12.9	--	
Cobalt	300 n	3,200	8,000	5.12	5.15	5.15	4.80	6.18	8.03	2.78	NT	NT	NT	NT	NT	5.53	4.80	3.80	4.84	4.41	4.52	4.38	3.94	4.93	4.98	4.82	
Copper	41,000 nc	38,000	2,500	21.4	83.5	34.7	18.6	123	176	16.8	NT	NT	NT	NT	NT	26.7	23.6	19.1	17.8	10.9	10.2	13.3	10.1	11.5	11.8	12.2	
Lead	800 n	3,500	1,000	12.8	79.8	14.5	11.5	104	137	12.8	NT	NT	NT	NT	NT	16.5	16.6	8.87	10.2	7.87	8.01	9.33	6.31	5.30	5.17	8.17	--
Mercury (SW7471A)	28 ns	180	20	0.14	1.09	0.17	0.095	1.63	1.98	0.29	NT	NT	NT	NT	NT	0.23	0.14	0.090	0.11	0.034	0.032	0.061	0.031	0.028	0.024	0.044	
Molybdenum	5,100 n	4,800	3,500	0.79 J	2.99	2.42 J	0.49 J	3.41	4.30	0.65 J	NT	NT	NT	NT	NT	0.53 J	0.51 J	0.62 J	0.56 J	0.41 J	0.35 J	0.48 J	0.61 J	0.39 J	0.51 J	0.53	
Nickel (assumed soluble salts)	20,000 n	16,000	2,000	17.7	78.7	16.3	16.2	120	164	15.7	NT	NT	NT	NT	NT	22.1	19.6	14.5	19.0	10.2	10.5	12.0	9.87	10.0	10.1	11.1	
Selenium	5,100 n	4,800	100	3.54	4.70	4.35	3.98	5.66	7.79	3.24	NT	NT	NT	NT	NT	4.11	4.24	1.82 J	3.38	1.97 J	3.38	3.57	1.99 J	3.84	4.12	3.76	
Silver	5,100 n	4,800	500	0.69 J	5.34	0.25 J	0.99	8.5	11.6	1.09	NT	NT	NT	NT	NT	1.00	1.18	0.37 J	0.39 J	0.20 J	0.21 J	0.40 J	0.26 J	0.068 J	0.068 J	0.265	
Thallium	66 n	63	700	0.54 U	0.58 U	0.49 U	0.69 U	0.65 U	0.54 U	NT	NT	NT	NT	NT	0.53 J	0.59 U	0.58 U	0.55 U	0.60 U	0.56 U	0.64 U	0.63 U	0.62	0.65 U	0.64	--	
Vanadium	5,200 n	6,700	2,400	37.9	44.3	36.7	31.7	58.2	78.4	20.0	NT	NT	NT	NT	NT	40.2	32.8	24.6	24.0	26.6	26.9	29.7	27.2	34.8	35.9	33.3	
Zinc	31,000 nm	100,000	5,000	71.7	291	70.1	60.2	470	641	62.5	NT	NT	NT	NT	NT	91.7	83.5	58.2	55.6	41.5	39.6	47.9	36.0	43.0	43.7	45.0	
Organochlorine Pesticides by SW8081																											
alpha-BHC (based on Lindane)	0.27 c	2.0*	4.0*	0.00532 U	0.00565 U	0.00510 U	0.00521 U	0.00644 J	0.00616 JP	0.00548 U	NT	NT	NT	NT	NT	0.00590 U	0.00519 U	0.00526 U	0.00516 U	0.00637 JP	0.00579 U	0.00577 U	0.00542 U	0.00591 U	0.00567 U	--	
gamma-BHC (Lindane)	2.1 c	2.0*	4.0*	0.00532 U	0.00565 U	0.00510 U	0.00521 U	0.00646 U	0.00631 U	0.00548 U	NT	NT	NT	NT	NT	0.00590 U	0.00519 U	0.00526 U	0.00516 U	0.00603 U	0.00579 U	0.00577 U	0.00542 U	0.00591 U	0.00567 U	--	
beta-BHC (based on Lindane)	0.96 c	2.0*	4.0*	0.00532 U	0.00565 U	0.00510 U	0.00521 U	0.00646 U	0.00631 U	0.00548 U	NT	NT	NT	NT	NT	0.00590 U	0.00519 U	0.00526 U	0.00516 U	0.00603 U	0.00579 U	0.00577 U	0.00542 U	0.00591 U	0.00567 U	--	