San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

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Mr. Bruce H. Wolfe,
Executive Officer
California Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

May 17, 2013

Re: Comments on Draft Order No. R2-2013- Revised Site Cleanup Requirements and Rescission of Order No. 94-017 (Pacific Rod and Gun Club, 520 John Muir Drive, San Francisco, CA)

Dear Mr. Wolfe,

I write to provide comments on the above referenced draft site cleanup order on behalf of the San Francisco Public Utilities Commission (SFPUC).

1. Page 2, Item 4 - Site Contamination: Line 4 states that "Fragments of targets containing PAHs can be found in soil at the Site between the ranges and the Lake". Our Supplemental Investigation and Health Risk Assessment Report submitted to the RWQCB in 2012 observed target fragments throughout the site, including the parking lot area upwind of the ranges and the Lake. This sentence should be edited to indicate that; "Fragments of targets containing PAHs can be found in soil across the Site including the parking lot behind the ranges".

2. Page 3, Item 4 - Site Contamination: Line 1 states that "Other asphaltic materials, with PAHs, have been detected in soils on other parts of the Site upwind of the ranges and the Lake". Based on the results of our Supplemental Investigation and Health Risk Assessment Report which included offsite background sampling, and previous historical site investigations, no "other" asphaltic materials have been observed onsite. This sentence should be edited to simply indicate that PAHs have been detected across the site, consistent with comment 1 above.

3. Page 6, Item 19 - Line 1: The reference to State Board Resolution Number 92-49 appears to be incorrect. According to the State Water Resource Control Board website, Resolution 92-49 was not approved by the Office of Administrative Law in 1993. The latest version appears to be Resolution Number 96-079. It also appears that the original Resolution 92-49 was amended on April 26, 1994 and on October 2, 1996, so perhaps the words "as amended" should be added following the reference to Resolution Number 92-49?

4. Page 8, Item 4 - Tasks – Lake Sediment - Completion of Remediation: The draft order proposes a Compliance Date of January 1, 2016 for completion of remedial activities related to Lake sediments and submittal of a completion report documenting these activities. However considering that none of the preliminary work has been conducted, a high level of uncertainty due to lack of investigation data, clarity on amount of required remediation, method of cleanup in a sensitive environment, level of required environmental permitting and level of environmental review makes it impractical to estimate a completion date at this time. Assuming the requested investigations conclude that sediment management or removal is required, a more accurate schedule and due date for implementation of remedial action, and preparation of a completion report could be determined by the RWQCB Executive Officer following completion of the Ecological Risk Assessment and the Remedial Action Plan.

The SFPUC is committed to working with the RWQCB staff and the PRGC to expeditiously implement the tasks in the draft order. Please feel free to contact me or Obiajulu Nzewi at onzewi@sfwater.org (415 554 1876) with any questions you may have regarding our comments on the draft order.

Sincerely,

Steven R. Ritchie
Assistant General Manager, Water

CC: Alan Friedman, RWQCB
Jim Arnold, PRGC

The Arnold Law Practice

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BY EMAIL,
ORIGINAL BY USPS

May 17, 2013

Mr. John Muller, Chair
San Francisco Bay Region
California Regional Water Quality Control Board,
1515 Clay Street, Suite 1400
Oakland, CA 94612

Re: Tentative Order No. R2-2013- for Site Cleanup Requirements and Rescission of Order No. 94-017, Pacific Rod & Gun Club Lake Merced Site.

Dear Mr. Muller:

Thank you for providing the opportunity to comment on this Tentative Order. As you know, I represent the Pacific Rod & Gun Club, a California nonprofit corporation. The Club operates and maintains a recreational facility for the benefit of the public.

The Tentative Order is well-written and succinct. We do have several issues, though, with specific items in the Tentative Order.

First, the Tentative Order assumes that its issuance warrants a categorical exemption from compliance with the California Environmental Quality Act (CEQA). This is a particularly significant issue because the San Francisco Public Utilities Commission (PUC) has unilaterally chosen a "dig, haul, and replace" remedy for remediation without evaluation of alternatives. The PUC's remedy is estimated by its contractor as costing upwards of $10 million in ratepayer money. Equally protective remedies for unlimited recreational uses, such as consolidation and encapsulation (which the City used for its Sharp Park shooting range), are estimated to cost about 1/2 what the PUC proposes to spend to "dig, haul, and replace." This information is already a part of the administrative record for this matter.

Second, the Tentative Order includes within the Site both the upland area of the Club and an adjacent area of Lake Merced. We have recently learned that although the water in the Lake is administered by the PUC, the land under the Lake is owned by the State of California and is administered by the State Lands Commission. Therefore, the Board should identify the State as a "discharger" pursuant to Section 13304, Water Code.

Each of these concerns can be briefly explained.

First, the Tentative Order relies on the so-called "common sense" exemption to CEQA, 14 CCR §15061(b) (3). The test is whether there is "no possibility" that the action being taken "will have the potential for causing a significant effect on the environment." The administrative record for the Tentative Order demonstrates that one of the "dischargers," the PUC has chosen a single remedy as appropriate. There is no analysis in the record to date that the remedy chosen by the PUC will have no adverse impacts. The Board should not simply assume that this Order, because it is believed to be intended to protect the environment, is entirely benign. The adoption of the new requirements – when the PUC has chosen a single remedy – has potential for both beneficial and adverse effects on the environment. See generally, *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190; *Building Code Action v. Energy Resources Conservation & Development Commission* (1980) 102 Cal.App.3d 577; and *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal.App.4th 372.

Nor does the Tentative Order, as presently written, come within the categorical exemption for actins to ensure the maintenance, restoration, enhancement, or protection of the environment, 14 CCR §15308 – in light of the unilateral decision of the PUC for a "dig, haul, and remove" remedy. The administrative record must show, at this point in time, the absence of significant environmental impact for this exemption to apply. See *California Unions for Reliable Energy v. Mojave Desert Air Quality Management District* (2009) 178 Cal.App.4th 1225. (Administrative record failed to include any evidence that air district's claim that its regulation would not result in significant adverse environmental effects; so the California appeal court ruled that the district's regulation did not qualify as an agency action to ensure the enhancement or protection of the environment.) Also see *International Longshoremen's & Warehousemen's Union, Local 35 v. Board of Supervisors* (1981) 116 Cal.App.3d 265 (California appeal court ruled that air district rule relaxing NOX emission standards was not categorically exempt where there was a reasonable possibility that such a change would have a significant effect on the environment).

Second, the Board should include the State of California as a "discharger" in the Tentative Order, as owner of the bed of Lake Merced. Since before the Porter-Cologne Water Quality Act was passed in 1968, it has been illegal to allow waters of the State. The Porter Cologne Act (California Water Code) §13304(a) requires, in relevant part,

that:

> "[A]ny person who ...has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged or discharged into the waters of the state and creates or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste..."

The State Water Resources Control Board ("State Board") has explained that:

> "[Section 13304 of the Water Code] applies to discharges that are past discharges, and clearly applies to uncontrolled, intentional, or negligent releases..." *In the Matter of the Petitions of the County of San Diego, et al.*, WQ 96-2 (State Water Resources Control Board, Feb. 22, 1996) 1996 WL 34481302.

In fact, it is for the creation and maintenance of a "nuisance," that the State should be included as a liable party in the Tentative Order, according to long-established California law.

> "It is the release of pollutants associated with that waste into the ground water that is the subject of a CAO [cleanup and abatement order], and that release is a violation of law. Since 1872, California law has prohibited the creation or continuation of a public nuisance. See Civ. Code § 3490. Water pollution can constitute a public nuisance. See *People v. Truckee Lumber Co.*, 116 Cal. 397, 48 P. 3 74 (1897). A successor property owner who fails to abate a continuing nuisance created by a prior owner is liable in the same manner as the prior owner. See *City of Turlock v. Bristow*, 103 Cal.App. 750, 284 P. 962 (1930)." *In re County of San Diego, supra.*

The Board is authorized to include the State, as the current owner of the bed of Lake Merced, in its cleanup orders.

Section 13304 of the Porter-Cologne Water Quality Act must be construed "in light of the common law principles bearing upon the same subject." *City of Modesto Redevelopment Agency v. Superior Court* (2004) 119 Cal.App.4th 28, 38. This is not a case like *City of Modesto Redevelopment Agency v. Superior Court* (2004) 119 Cal.App.4th 28, where the Porter-Cologne Act did not make manufacturers of drycleaning solvents and equipment liable because "...<u>those with no ownership or control over the property</u> or the discharge, and whose involvement in a discharge was remote and passive." *Id.*, 119 Cal.App.4th 43. *(Emphasis added.)*

Thank you for your attention and response to these two critical issues with the Tentative Order. We ask that the Regional Board consider carefully the potential for

environmental harm with the issuance of the Tentative Order as currently written.

Very truly yours,

James R. Arnold

Cc:

Mr. Patrick Gilligan, President, Pacific Rod & Gun Club, Inc.
Ms. Terry Young, Ph.D., Vice Chair
Mr. Jim McGrath, Member
Ms. Abe-Koga, Member
Mr. William Kissinger, Member
Mr. Alan D. Friedman, P.E., Water Resource Control Engineer

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BY EMAIL,
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May 30, 2013

Mr. Alan Friedman
San Francisco Bay Region
California Regional Water Quality Control Board,
1515 Clay Street, Suite 1400
Oakland, CA 94612

Re: Tentative Order No. R2-2013- for Site Cleanup Requirements and Rescission of Order No. 94-017, Pacific Rod & Gun Club Lake Merced Site.

Dear Alan:

As you know, I represent the Pacific Rod and Gun Club, Inc., a California nonprofit corporation. We respectfully submit that the Tentative Order under consideration should include the State as a responsible party.[1] According to the maps supplied by the City, aerial photos, and historical maps of the Rancho Laguna de la Merced, most of the bed of the Lake offshore of Fields 1 through 7 is owned by the State. Some of the upland, or foreshore area, also appears to be below the historical mean high water mark, according to the available maps, and so is also owned by the State.

I am sending a copy of this letter to Mr. Milstein, attorney for the City, with a request that we review together as soon as possible the maps and other documents that he has available.

The City has concluded that a map Mr. Milstein provided to you (the "163" map) "...shows the label for the club (when magnified) to be within the rancho boundary..." However, when we look at this map and the 1871 plat of the Rancho Laguna de la Merced, we can see that the "geometry" of the Lake, including the "cove" between the

[1] As I mentioned to you earlier today, we also have some comments on the letter of May 17, 2013 that you received from the San Francisco PUC. We will have those comments for you tomorrow.

SFPD facility and the Club's area appears remarkably the same in both the 1871 plat map and in the more recent "163" map. (Copies of these two maps are enclosed for easy reference, respectively, as Exhibits A and B.)

The following explains the basis for these conclusions in more detail.

The copy of the 1871 plat map we received from the City is fairly obscured, but it does show the western boundary of the Rancho land grant. On the "163 map" provided by the City there has been drawn a North-South line and a legend stating *"Approx. Western Boundary of Laguna de La Merced."*

Some more clear copies of historical maps of the Rancho Laguna de la Merced are available from the Internet. (Copies are enclosed as Exhibits C and D.) They depict the boundary lines of the Rancho. They show the western boundary to be a roughly North South line cutting across the Lake.

There are also a couple of helpful aerial photos. The first aerial photo is an AMEC aerial photo, provided by the City. (Exhibit E) The second is a current aerial photo of the Club's facilities, provided by the Club to the City recently. (Exhibit F)

Using the "163" map, with the line shown as the West boundary of the Rancho Laguna de la Merced, a red line can be drawn on both aerial photos to mark what appears to be the North South line for the western boundary of the Rancho Laguna de la Merced.

From all of this, it appears that the bed of the Lake offshore of Trap and Skeet Fields 1-7 (i.e., the shoreline from the "cove" to the rifle range building) is more likely than not "lands of the State." (See Exhibit F). In addition, some of the foreshore between the shooting fields and the present water's edge is also owned by the State. California acquired sovereign fee ownership of the lands between low and high water in nontidal navigable lakes and rivers upon its admission to the Union in 1850. *State of California v. Superior Court (Lyon)* (1981) 29 Cal. 3d 210, 217-222. The Lake was periodically connected to the Pacific Ocean at the time of statehood.

The general policy of the Board has been to name all property owners, pursuant to Section 13304, Water Code, as responsible parties. Naming the State should facilitate both the needed investigation and the resolution as to what is needed for the Board, the City, and the State to carry out their responsibilities.

We urge the Board to include the State as a responsible party on the Proposed Order for Site Cleanup Requirements.

Very truly yours,

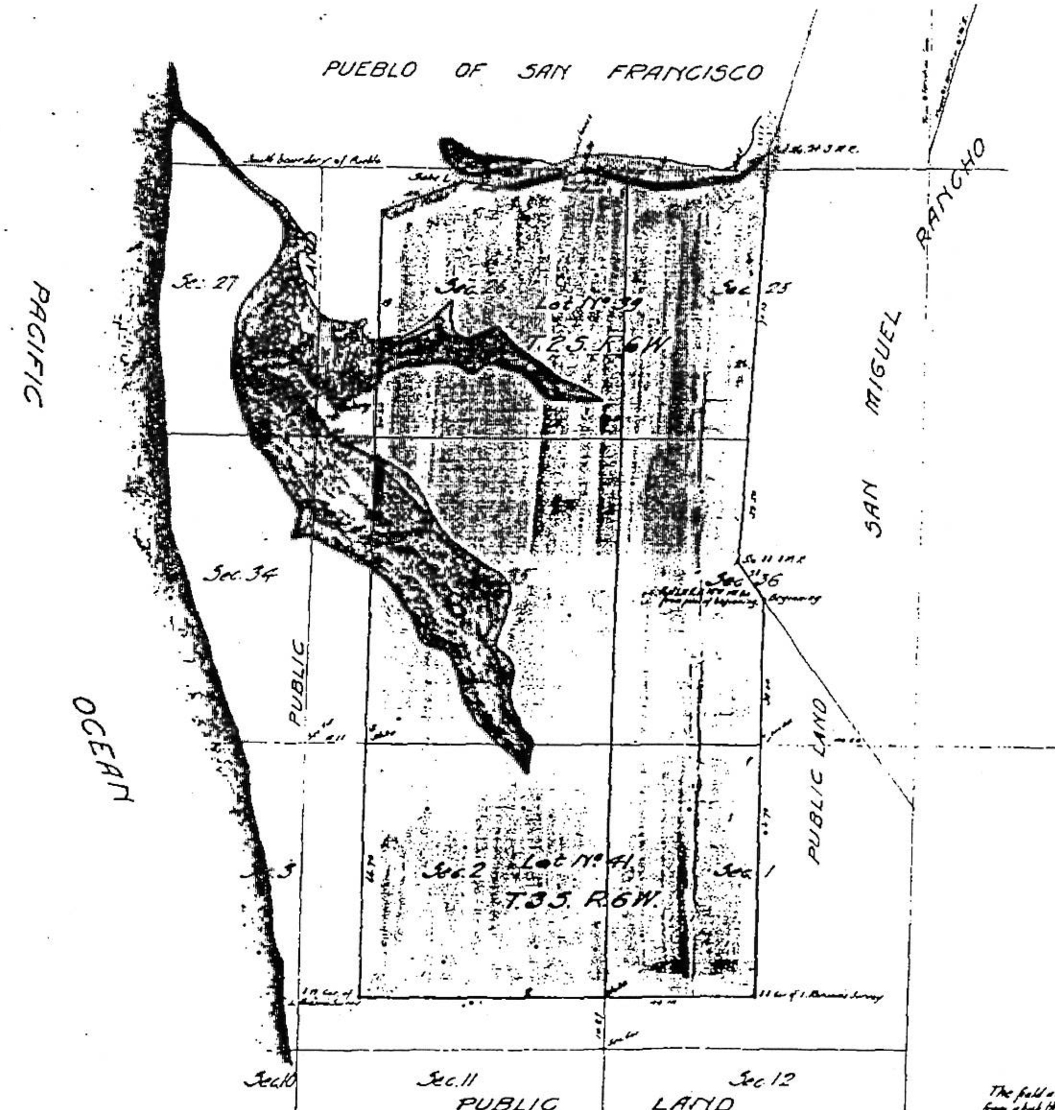
James R. Arnold

Encls. – as noted

Cc (w/encls.):

Mr. Patrick Gilligan, President, Pacific Rod & Gun Club, Inc.
Mr. Josh Milstein, Office of the City Attorney, City and County of San Francisco

1116785



PLAT

of the Rancho

LAGUNA DE LA MERCED

finally confirmed to

JOSEFA DE HARO et al.

as located at the request of [illegible] in accordance with the [illegible] of the

HON. COMMISSIONER OF GENERAL LAND OFFICE dated April 27th 1871

by George H. Thompson, Surveyor
May 1871

Containing within boundaries shaded brown 2219 [illegible] Acres

Scale 20 Chains to an Inch.

Explanation.

1st The Ransom's Survey of the Half Square League of Laguna de la Merced [illegible] the Tract of Land [illegible] and [illegible] an Area of — 2191.[illegible] Acres.
Of the 2 Tracts [illegible] added to the Ransom's Survey at the request of [illegible]:

2nd Tract A covers Lot No. [illegible] of Section 26, Lot No. [illegible] of Section 27, and Lot No. 1 of Section 35 all of Township No. 2 South, Range No. 6 West of Mount Diablo Meridian, as shown on Map of said Township approved October [illegible] and contains an Area of — 53.76 .

3rd Tract B is described as follows: Beginning at [illegible] the North East Corner of Ransom's Survey of "Laguna de la Merced", thence following said survey [illegible] [illegible] and containing an Area of — 10.16 .

Aggregate Area as claimed — 22[illegible] .

Boundaries shaded brown								
No.	Course	Chs.	No.	Course	Chs.	No.	Course	Chs.
1	South	61.70	10	N. 75° W.	7.00	19	North	44.95
2	West	41.17	11	North	1.00	20	N. 70° E.	22.00
3	North	144.30	12	N. 71½° E.	11.00	21	S. 85° E.	16.70
4	N. 85½° W.	1.66	13	S. 64½° E.	.75	22	N. 76°45' E.	23.17
5	N. 65° W.	9.66	14	S. 36° E.	1.00	23	S. 75° E.	19.11
6	N. 15° W.	3.50	15	S. 63° E.	5.50	24	N. 87° E.	35.00
7	N. 42½° W.	6.00	16	S. 29° E.	7.00	25	N. 57° E.	11.00
8	N. 39½° W.	9.00	17	N. 46° E.	1.60	26	S. 15° W.	146.65
9	N. 52½° W.	8.00	18	N. 13½° E.	8.90	27	S. 58° E.	13.13

I hereby certify that it conformity with the instructions of the Hon. Commissioner of the General Land Office, dated April 27th 1871, this survey and plat were advertised for thirty days in the [illegible]

The field notes of the Rancho Laguna de la Merced, finally confirmed to Josefa de Haro et al. from which this plat has been made, have been examined and approved and are on file in this office.
U.S. Surveyor General's Office,
San Francisco, California [illegible]

J. R. HARDENBERGH

EXHIBIT A

163

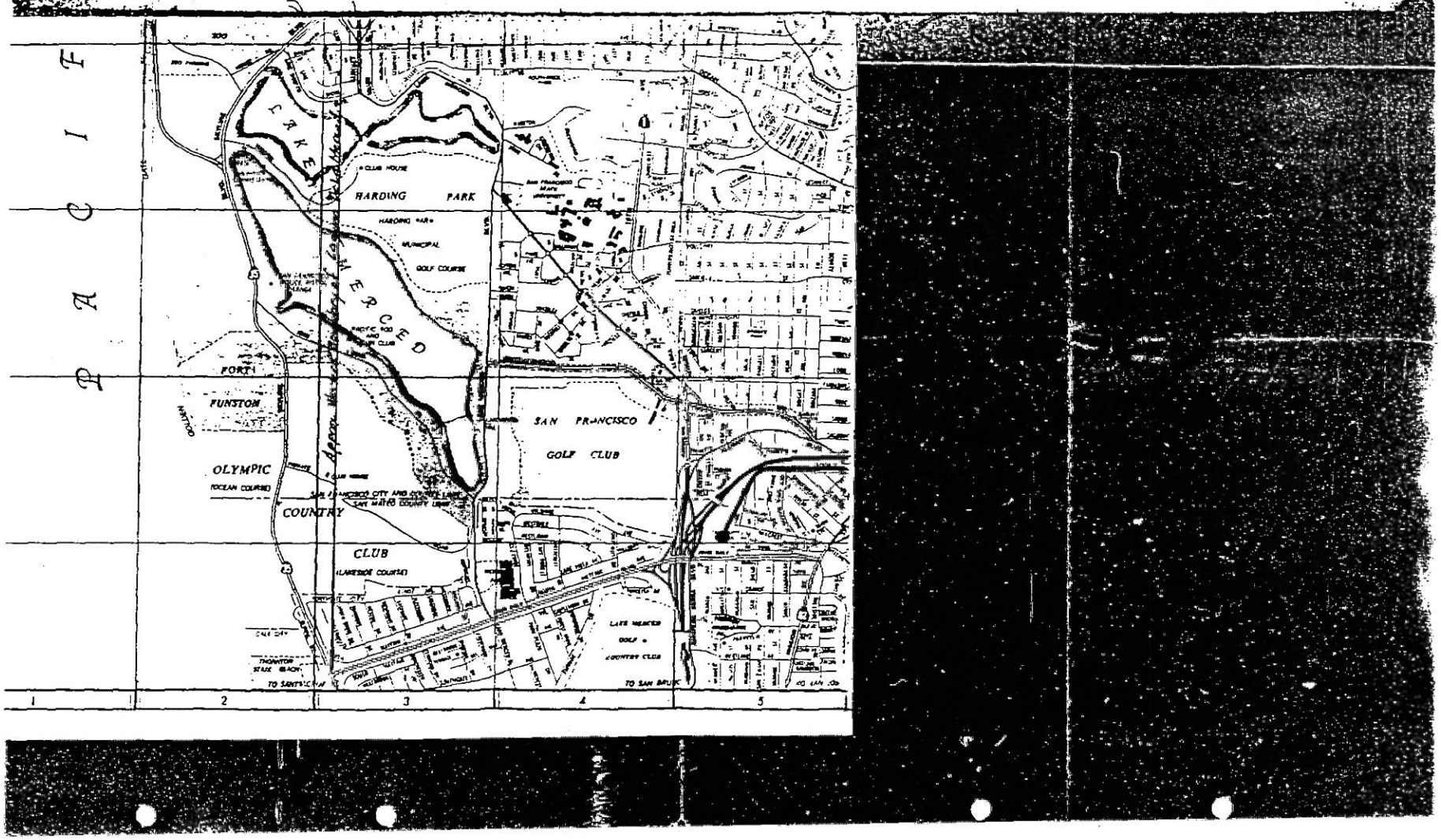
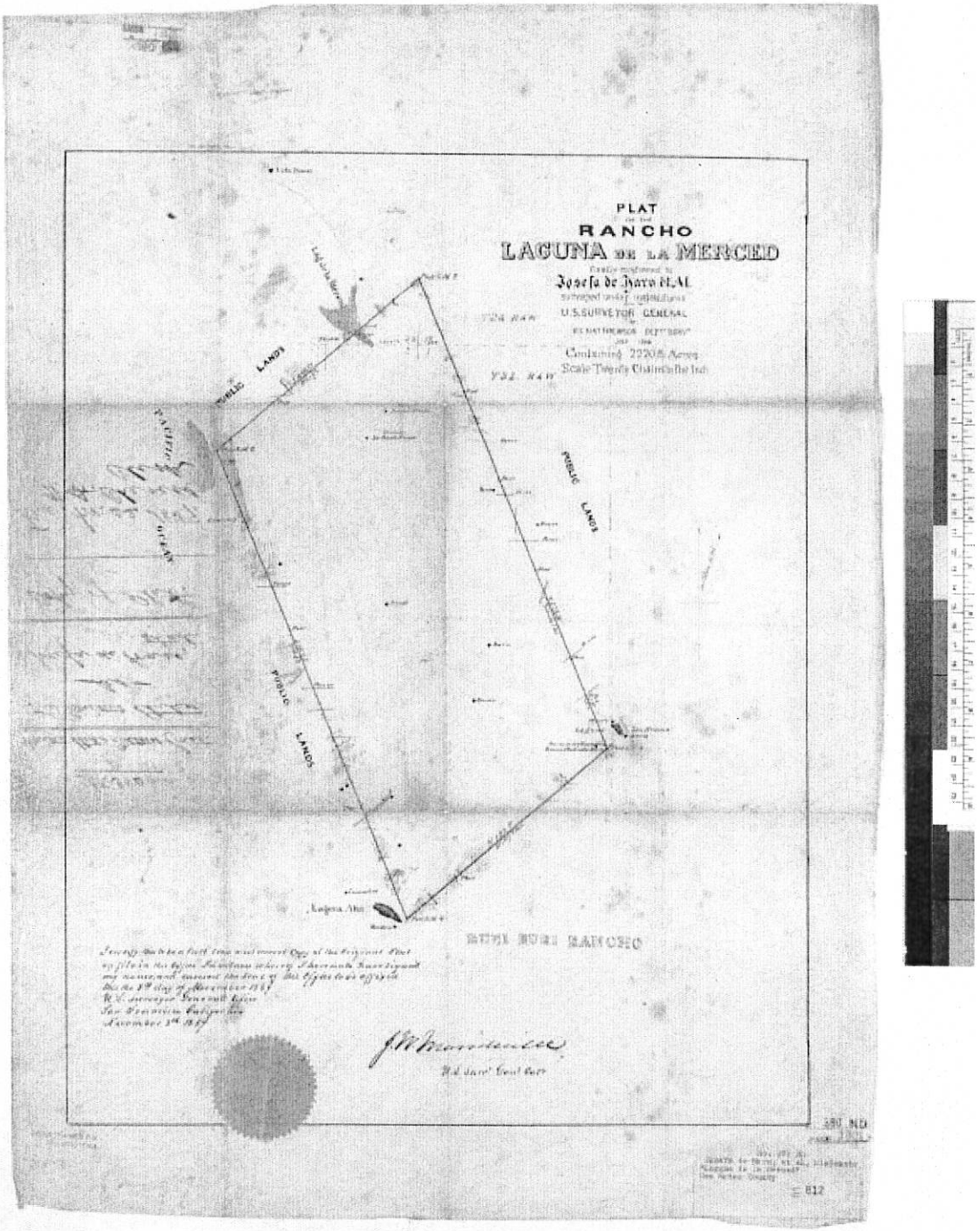
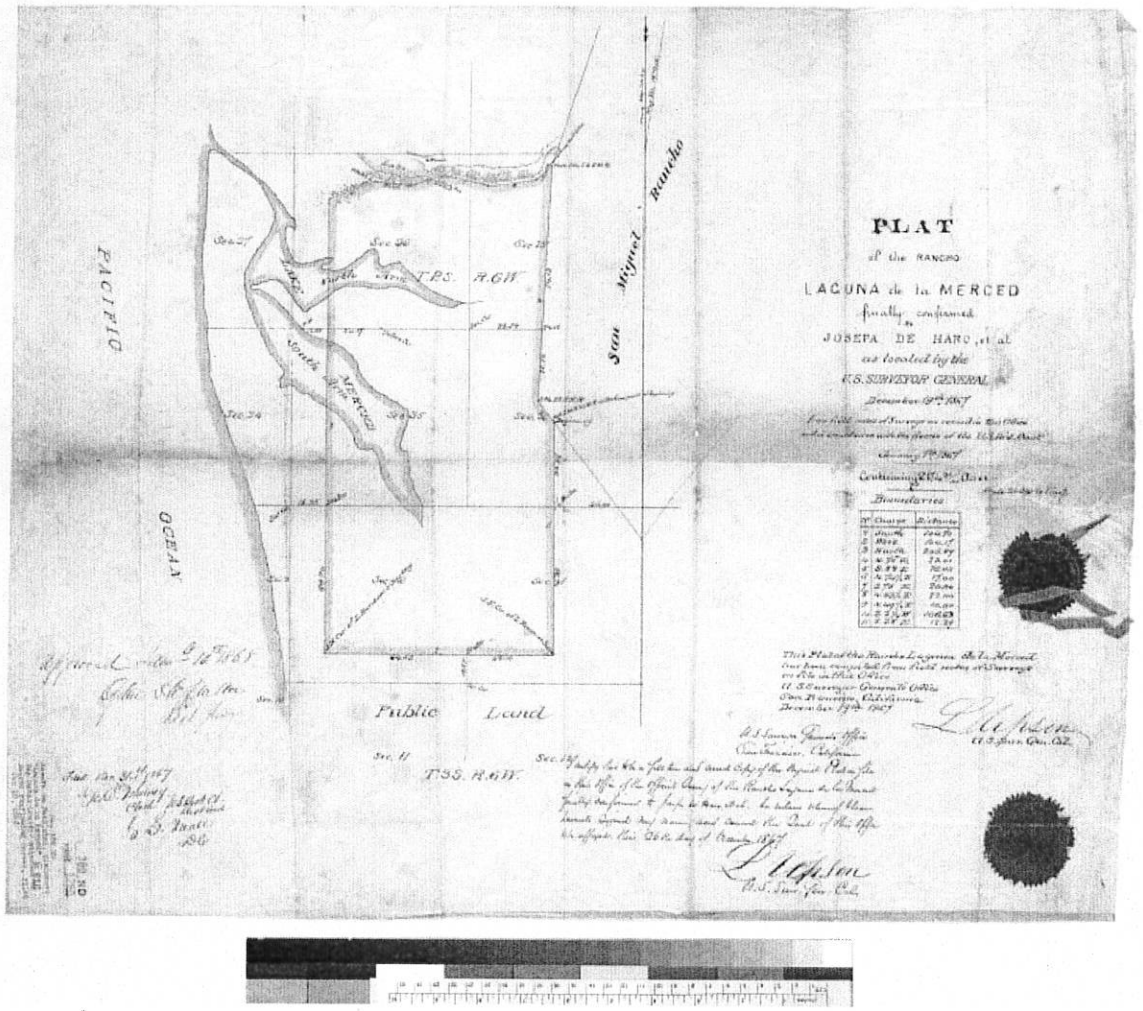


EXHIBIT B



http://www.oac.cdlib.org/ark:/13030/hb7h4nb3r2/?order=2&brand=oac4(accessed 2013 05 230)

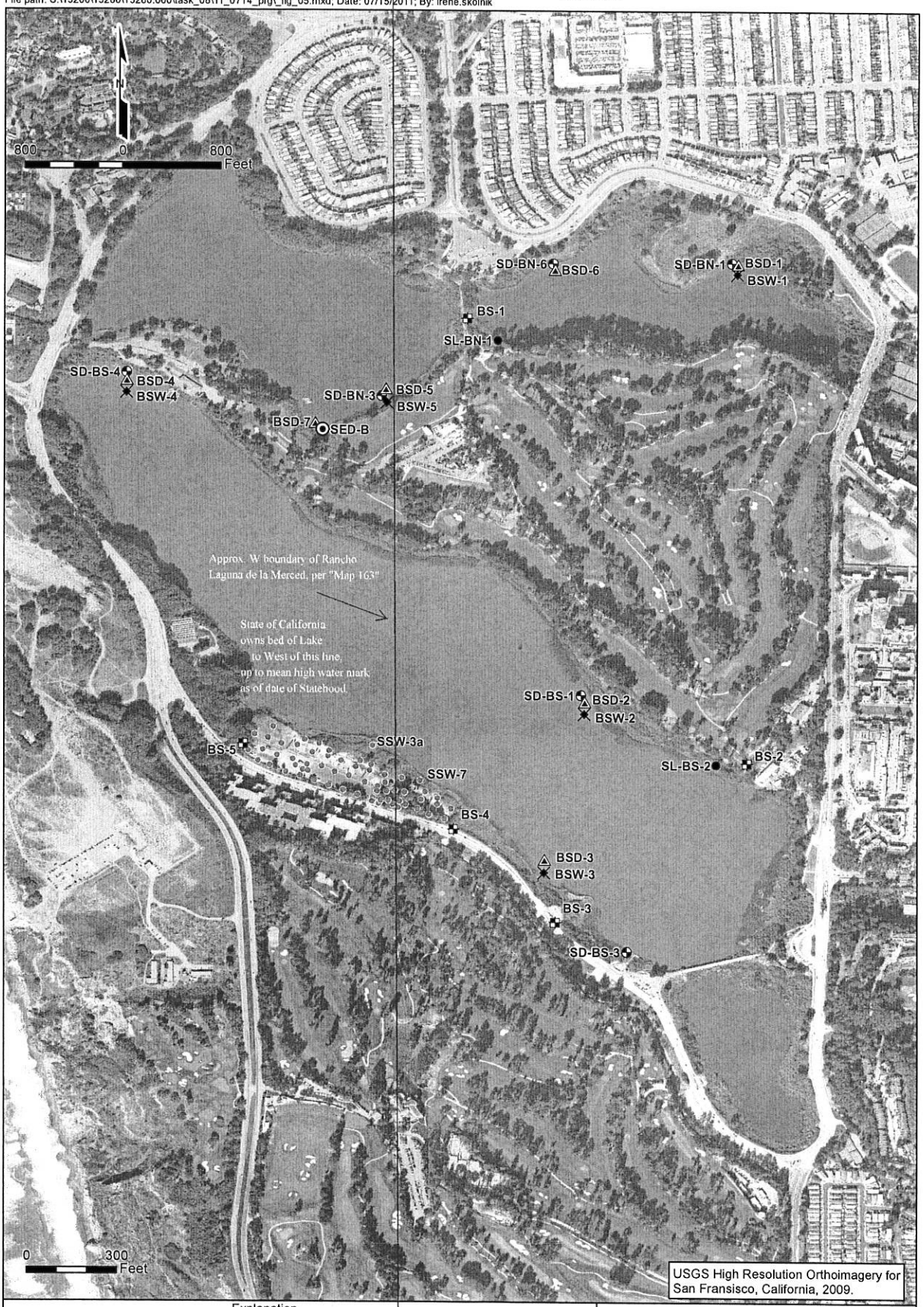
EXHIBIT C



Plat of the Rancho Laguna de la Merced, finally confirmed to Josefa de Haro et al. : [San Francisco, Cal.] / as located by the U.S. Surveyor General [verso]
http://content.cdlib.org/ark:/13030/hb0n39n5q7/?order=3 (accessed 2013 05 30)

EXHIBIT D

File path: S:\15200\15280\15280.000\task_08\11_0714_prg_fig_05.mxd; Date: 07/15/2011; By: irene.skolnik



Explanation

- Soil sample location
- 2010 background soil sample location
- 2010 background sediment sample location
- 2010 background surface water sample location
- 2005 background soil sample (URS)
- 1993 background sediment sample (E&E)
- 1993 background soil sample (E&E)

BACKGROUND SAMPLE LOCATIONS
Pacific Rod and Gun Club
San Francisco, California

By: CD	Date: 07/15/2011	Project No. 15280.000
AMEC Geomatrix	Figure 5	

EXHIBIT E

Approx. W boundary of Rancho Laguna de la Merced, per "Map 163" State of California owns bed of Lake to West of this line, up to median high water mark at time of Statehood.

EXHIBIT F

The Arnold Law Practice

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BY EMAIL,
ORIGINAL BY USPS

June 3, 2013

Mr. Alan Friedman
San Francisco Bay Region
California Regional Water Quality Control Board,
1515 Clay Street, Suite 1400
Oakland, CA 94612

Re: Tentative Order No. R2-2013- for Site Cleanup Requirements and Rescission of Order No. 94-017, Pacific Rod & Gun Club Lake Merced Site.

Dear Alan:

On behalf of the Pacific Rod & Gun Club, we respectfully submit the enclosed declaration from Frank H. (Bert) Swan. This declaration explains why the SFPUC was in error in its May 17 letter claiming that target fragments were found throughout the site according to the AMEC investigation report. It also explains how the AMEC report does not support the SFPUC's claim that aside from targets, no other asphaltic materials have been observed on site. These are serious misstatements and mischaracterize the facts that exist in the Board's record.

We ask that the original statements in the Tentative Order be retained as to targets and asphaltic materials. We also ask that if the Board changes these statements in the Tentative Order, or if the Tentative Order does not include the State as a responsible party (as addressed in our May 30 letter), that the Tentative Order be moved from the uncontested calendar at the June 12 Board meeting to the contested calendar. Alternatively, we ask that matter be continued to the July 10, 2013 Board meeting so we can see if these items can be worked out with the SFPUC.

The Swan declaration is being submitted with a facsimile signature. An original declaration will be filed with Mr. Swan's original signature as soon as possible.

Thank you in advance for your consideration of our May 31, 2013 letter and this letter with Mr. Swan's declaration. Please let me know if you have any questions.

Very truly yours,

James R. Arnold

Encl. – Declaration of Frank H. (Bert) Swan

Cc (w/encl.)(by email only):

Mr. Patrick Gilligan, President, Pacific Rod & Gun Club, Inc.
Mr. Josh Milstein, Office of the City Attorney, City and County of San Francisco

JAMES R. ARNOLD (SB# 56262)
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Attorneys for Pacific Rod & Gun Club, Inc.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

IN RE: TENTATIVE ORDER NO. R2-2013- ____, REVISED SITE CLEANUP REQUIREMENTS and RESCISSION OF ORDER NO. 94-017 FOR PACIFIC ROD AND GUN CLUB AND THE CITY AND COUNTY OF SAN FRANCISCO SAN FRANCISCO PUBLIC UTILITIES COMMISSION	Case No. CIV468569 **DECLARATION OF FRANK H. (BERT) SWAN** Hearing Date: June 12, 2013

I, FRANK H. (BERT) SWAN, declare as follows:

1. I have been an independent consulting geologist based in San Francisco since 2001. From 1985 to 2001, I was Principal Geologist and Vice President of Geomatrix Consultants, Inc. From 1974 to 1985, I was a senior project geologist with Woodward-Clyde Consultants. The primary focus of my work is on the identification and evaluation of geologic hazards. I have more than 30 years of experience reviewing and evaluating technical reports, including sample results, maps, diagrams, aerial photographs, and related documents and other forms of media. A copy of my current resume is attached as Exhibit A.

2. As a Director and Member of the Pacific Rod and Gun Club, I am familiar with the John Muir Drive site. Since 2011, I have reviewed and evaluated various reports, studies, and other documentation pertaining to the site conditions.

3. I reviewed the letter of May 17, 2013 from the San Francisco Public Utilities Commission ("SFPUC") to the California Regional Water Quality Control Board. A copy is attached as Exhibit B. This declaration provides my comments on this letter, first, by identifying

the points in the Tentative Order which the SFPUC contests and, secondly, explaining why the SFPUC is incorrect. *In short, the SFPUC is incorrect in asserting that fragments of targets have been found throughout the site and that no asphaltic materials other than targets have been found on the site.*

4. Regarding the *distribution of clay target debris*:

a. The Tentative Order states: "Fragments of targets containing PAHs can be found in soil at the Site between the ranges and the Lake."

b. The SFPUC states: *"Our Supplemental Investigation and Health Risk Assessment Report submitted to the RWQCB in 2012 observed target fragments throughout the site, including the parking lot area upwind of the ranges and the Lake."*

c. The SFPUC asks that the Tentative Order be amended to state: *"Fragments of targets containing PAHs can be found in soil across the Site including the parking lot behind the ranges."*

*(*The SFPUC does not provide specific references to substantiate these revisions, such as pages, etc., to the "*Supplemental Investigation and Health Risk Assessment Report submitted to the RWQCB".)*

5. As to *whether other asphaltic materials with PAHs have been found on the site*:

a. The Tentative Order states: "Other asphaltic materials, with PAHs, have been detected in soils on other parts of the Site upwind of the ranges and the Lake."

b. The SFPUC states: *"Based on the results of our Supplemental Investigation and Health Risk Assessment Report which included offsite background sampling, and previous historical site investigations, no 'other" asphaltic materials have been observed onsite. This sentence [of the Tentative Order] should be edited to simply indicate that PAHs have been detected across the site…"*

(The SFPUC does not provide specific references to substantiate these revisions, such as pages, etc., to the "*Supplemental Investigation and Health Risk Assessment Report submitted to the RWQCB."*)

6. I reviewed the 592 page *"Supplemental Investigation and Health Risk Assessment Report, Pacific Rod and Gun Club, San Francisco, California, Prepared for: City and County of San Francisco, California, Prepared by: AMEC Geomatrix, Inc., Oakland, California."* I reviewed the text, the figures, the diagrams, the sampling reports, and the sampling results.

7. The *"Supplemental Investigation and Health Risk Assessment Report"* does not report any clay target debris in the borings in the parking areas to the west of the skeet and trap fields. And, "Asphaltic concrete" (not clay target debris) is reported in two borings to the west of the skeet fields. Exhibit C-1 is an aerial photograph that shows the location of the club facilities, including the ranges, the parking lot, the skeet and trap houses, and the buildings. Exhibit C-2 shows the boring locations.

a. Clay target debris is reported in borings B10c, B12, C1, C2, C5, C9, C10, C13, C14, D2, D4, D5, D6, D8, and D9 (logs of these boreholes are provided in Exhibit D). The distribution of the clay target debris reported in these borings is consistent with the locations and down-range trajectories of various skeet and trap houses.

b. In the parking area to the west of the skeet fields, "asphaltic materials," were reported in borings B5a and B5b (logs of these borings are provided in Exhibit E).

8. Reviewing Table 6, Soil Analytical Data, PAHs (page 2), from the *Report* clearly shows that PAHs are found in the first ½ feet (6 inches) of the sample taken from borings B5a and B5b. A copy of Table 6 is attached as Exhibit F. The B5a boring was in the asphalt-paved area in front of the Shell House, and the B5b boring was in the rear of the building (See Exhs. C-1 and C-2). No clay pigeon debris was found in these borings.

9. The results of the soil analyses clearly show that the PAHs at the site are more widely distributed than the clay pigeon debris. These results, combined with the data from borings B5a and B5b, indicate that there may be other sources of PAHs at the site that are not considered in the Report. Other sources of PAHs should be expected to include: runoff from the asphalt-paved parking areas; runoff from the asphalt-shingled roofs; runoff from John Muir Drive; and exhaust fumes associated with traffic along John Muir Drive. For example, the Club is downgradient from John Muir Drive, yet no effort was made to determine if runoff from this

asphalt paved street contains PAHs.

12. My conclusion is that several statements in the SFPUC's May 17 letter are not supported by any facts in the Report submitted by the SFPUC to the Board. Specifically, these include:

a. SFPUC Statement #1: *"… target fragments [are found] throughout the site, including the parking lot area upwind of the ranges and the Lake…"*

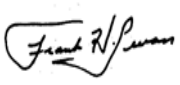
This is unsupported. According to the SFPUC's Report, clay target debris was only found at the Fields (ranges) and towards the Lake. The Report does not support the statement suggested by the SFPUC to be added to the Order, namely, *"Fragments of targets containing PAHs can be found in soil across the Site including the parking lot behind the ranges."*

b. SFPUC Statement #2 (paraphrased): *"no 'other" asphaltic materials have been observed onsite."*

According to the SFPUC's Report, "asphaltic concrete: (3 inches thick)" was found in borings B5a and B5b. According to Table 6, Soil Analytical Data, PAHs, there are PAHs in the top 6 inches of the samples from both borings. My use of the Club shows me that there is asphaltic paving in a large parking area, roadways, and other areas throughout the site.

The Report does not support the suggestion by the SFPUC that the Board change the statement in the Tentative Order, *"Other asphaltic materials, with PAHs, have been detected in soils on other parts of the Site upwind of the ranges and the Lake"* so that the Tentative Order "*should be edited to simply indicate that PAHs have been detected across the site…"*

I swear, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Executed this 3rd day of June 2013 in San Francisco, California.



Frank H. (Bert) Swan

EXHIBIT A

FRANK H. (BERT) SWAN
CONSULTING GEOLOGIST

240 Laidley Street
San Francisco, CA 94131

Tel: (415) 282-2370
Mobile: (415) 722-7493
E-mail: bertswan3@gmaill.com

Geologic Hazards Assessment
Seismic Geology and Paleoseismology
Neotectonics
Quaternary Geology
Geomorphology

EDUCATION

The Johns Hopkins University, Baltimore, Maryland: Ph.D., Geography and Environmental Engineering, 1975
Denison University, Granville, Ohio: B.A., Geology, 1969

PROFESSIONAL HISTORY

Independent Consulting Geologist, 2001 to present
Geomatrix Consultants, Inc., Vice President and Principal Geologist, 1985 to 2001
Woodward-Clyde Consultants, Senior Project Geologist, 1974 to 1985

REPRESENTATIVE EXPERIENCE

Dr. Swan's 30 years of consulting experience have emphasized regional and site-specific geologic, seismologic, and geophysical studies to identify and evaluate potential geologic hazards. He has directed studies assess potential earthquake hazards for more than 35 existing and proposed dams, and more than 15 nuclear power plants, located in a variety of tectonic environments both in the United States and abroad. He has evaluated earthquake-related hazards including potential earthquake ground motions, surface faulting, soil liquefaction, landslides, and earthquake-induced flooding in both the eastern and western United States, Alaska, Central and South America, the Caribbean, North Africa, Europe, Asia, and the Middle East.

Selected projects include the following:

Seismic Source Characterization, Wyoming Dams (2004). Working in cooperation with the U.S. Bureau of Reclamation's Seismotectonics and Geophysics Group, Dr. Swan reassessed the seismic source characteristics of the South Granite Mountains fault in Wyoming. The work is part of a study to update probabilistic seismic hazard analyses for six Reclamation dams on the North Platte River in Wyoming.

Lauro Dam, Consultant Review Board (2004). Dr. Swan was a member of the Consultant Review Board contracted by the U.S. Bureau of Reclamation to provide independent technical review of their dam safety activities related to seismic stability and seepage resulting from potential fault rupture within the foundation, embankment and abutment of Lauro Dam, California.

EXHIBIT A

Humboldt Bay Power Plant, ISFSI Site, California (2000-2003). Dr. Swan was the Project Manager for geological investigations to assess the potential for surface-fault rupture at the proposed dry cask storage facility for spent nuclear fuel. He also assisted Pacific Gas and Electric Company in preparing and reviewing various sections of the Safety Analysis Report to support their license application to the U.S. Nuclear Regulatory Commission.

Krško NPP, Slovenia (2001-2003). In cooperation with Slovenian and Croatian geologists, seismologists, geophysicists and engineers, Dr. Swan directed studies to: (1) develop a seismotectonic model of the Krško basin; (2) revise the probabilistic seismic hazard assessment for the site; and (3) update the related sections of the USAR for the Krško NPP.

Potter Valley Penstock, Landslide Investigation for Pacific Gas and Electric Company (2001) . Dr. Swan excavated and logged test pits and examined boring records to reconstruct the geometry of an actively creeping landslide.

Fault Evaluation, University of California at Berkley (1999). Dr. Swan participated in geologic mapping and trench studies of the Hayward fault zone as part of an evaluation of the potential for surface fault rupture at Memorial Stadium.

New Carquinez Bridge, California (1999-2001). Dr. Swan participated in the mapping and analysis of the rock conditions at the north anchorage. Investigations included studies to determine the nature and origin of faulting in the vicinity of the anchorage.

Geohazards Mapping, U.S. Government Installations (1997-2001). As part of studies for the U.S. Army Engineering Division, Dr. Swan participated in a series of geologic evaluations to develop estimates of the potential earthquake ground shaking (peak ground acceleration and response spectra), and to evaluate the potential for earthquake-related geologic hazards (surface fault rupture, soil liquefaction, soil differential compaction, landsliding, and flooding.

High Level Nuclear Waste Repository, Yucca Mountain, Nevada (1989-1998). Dr. Swan was Project Manager and Co-Principal Investigator of an extensive geologic mapping and trenching program to evaluate the location and recency of faulting near the prospective surface facilities for the proposed underground repository. He was also a member of the panel of seismic experts that developed seismotectonic models to characterize the regional and local earthquake sources for the probabilistic analyses of the fault displacement hazard and the vibratory ground motion at the proposed repository.

EXHIBIT B

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
F 415.554.3161
TTY 415.554.3488

Mr. Bruce H. Wolfe,
Executive Officer
California Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

May 17, 2013

Re: Comments on Draft Order No. R2-2013- Revised Site Cleanup Requirements and Rescission of Order No. 94-017 (Pacific Rod and Gun Club, 520 John Muir Drive, San Francisco, CA)

Dear Mr. Wolfe,

I write to provide comments on the above referenced draft site cleanup order on behalf of the San Francisco Public Utilities Commission (SFPUC).

1. Page 2, Item 4 - Site Contamination: Line 4 states that "Fragments of targets containing PAHs can be found in soil at the Site between the ranges and the Lake". Our Supplemental Investigation and Health Risk Assessment Report submitted to the RWQCB in 2012 observed target fragments throughout the site, including the parking lot area upwind of the ranges and the Lake. This sentence should be edited to indicate that; "Fragments of targets containing PAHs can be found in soil across the Site including the parking lot behind the ranges".

2. Page 3, Item 4 - Site Contamination: Line 1 states that "Other asphaltic materials, with PAHs, have been detected in soils on other parts of the Site upwind of the ranges and the Lake". Based on the results of our Supplemental Investigation and Health Risk Assessment Report which included offsite background sampling, and previous historical site investigations, no "other" asphaltic materials have been observed onsite. This sentence should be edited to simply indicate that PAHs have been detected across the site, consistent with comment 1 above.

3. Page 6, Item 19 - Line 1: The reference to State Board Resolution Number 92-49 appears to be incorrect. According to the State Water Resource Control Board website, Resolution 92-49 was not approved by the Office of Administrative Law in 1993. The latest version appears to be Resolution Number 96-079. It also appears that the original Resolution 92-49 was amended on April 26, 1994 and on October 2, 1996, so perhaps the words "as amended" should be added following the reference to Resolution Number 92-49?

EXHIBIT B

4. Page 8, Item 4 - Tasks – Lake Sediment - Completion of Remediation: The draft order proposes a Compliance Date of January 1, 2016 for completion of remedial activities related to Lake sediments and submittal of a completion report documenting these activities. However considering that none of the preliminary work has been conducted, a high level of uncertainty due to lack of investigation data, clarity on amount of required remediation, method of cleanup in a sensitive environment, level of required environmental permitting and level of environmental review makes it impractical to estimate a completion date at this time. Assuming the requested investigations conclude that sediment management or removal is required, a more accurate schedule and due date for implementation of remedial action, and preparation of a completion report could be determined by the RWQCB Executive Officer following completion of the Ecological Risk Assessment and the Remedial Action Plan.

The SFPUC is committed to working with the RWQCB staff and the PRGC to expeditiously implement the tasks in the draft order. Please feel free to contact me or Obiajulu Nzewi at onzewi@sfwater.org (415 554 1876) with any questions you may have regarding our comments on the draft order.

Sincerely,

Steven R. Ritchie
Assistant General Manager, Water

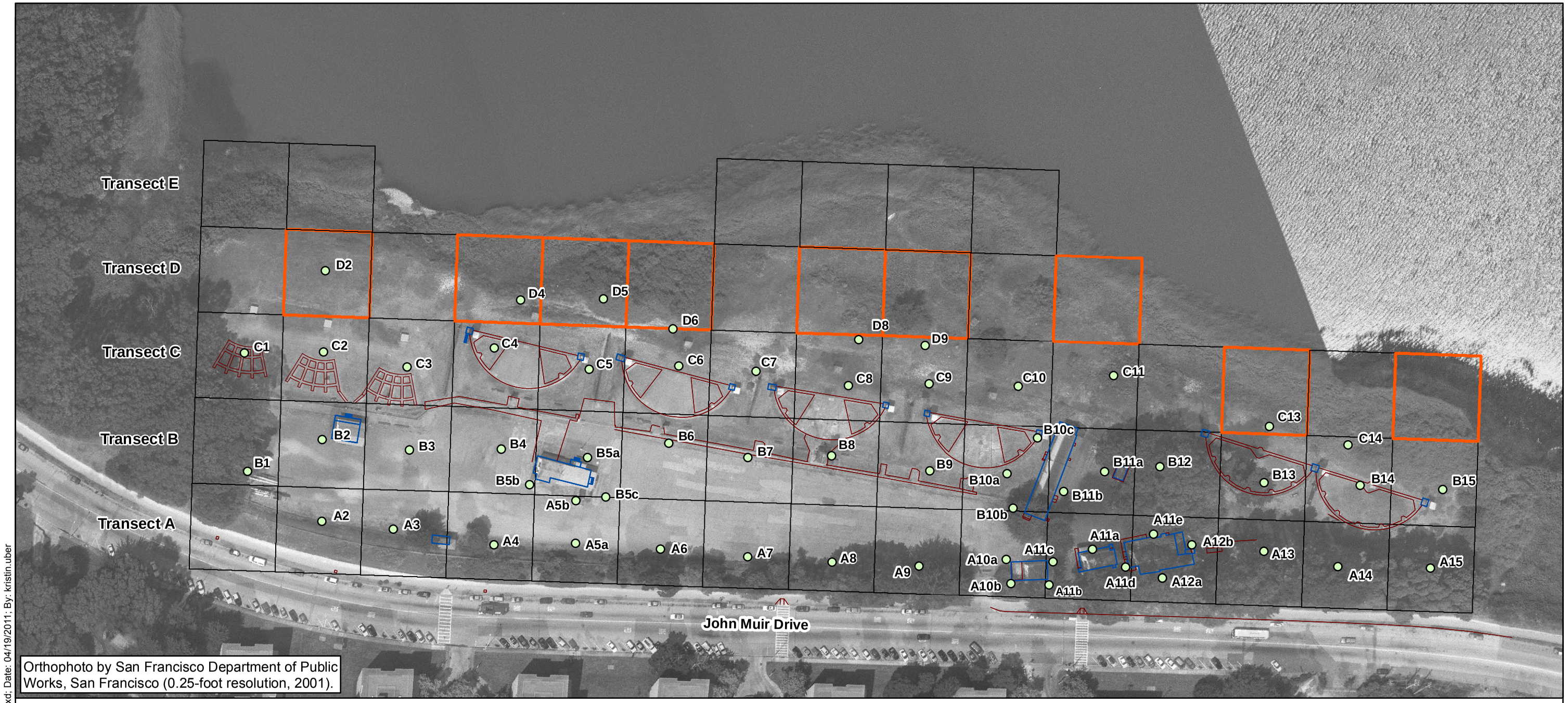
CC: Alan Friedman, RWQCB
Jim Arnold, PRGC

EXHIBIT C-1

PACIFIC ROD & GUN CLUB
SITE MAP KEY
A TRAP HOUSE
B SHELL HOUSE
C CLUB HOUSE
D BBQ HOUSE
E FORMER CARETAKER'S RESIDENCE
F INDOOR RIFLE RANGE
G TRAP FIELDS: 1, 2, 3
H SKEET FIELDS: 4, 5, 6, 7, 8, & 9
J STORAGE CONTAINERS
K MAINTENANCE STORAGE BUILDING
L RESTROOMS
John Muir Dr

EXHIBIT C-1

EXHIBIT C-2



Explanation

- Soil sample location
- Sampling grid
- Confirmation sampling grid
- Building outline
- Concrete structure

100 0 100 Feet

Note:
Soil samples collected at 0.5, 1, 1.5, 2, and 3 feet below ground surface by AMEC between November 29 and December 2, 2010.

SOIL SAMPLING LOCATIONS
Pacific Rod and Gun Club
San Francisco, California

By: GFS	Date: 04/19/2011	Project No. 15280.000
AMEC Geomatrix	Figure	2b

File path: S:\15200\15280\15280.000\task_08\11_0131_prgc_fig_02b.mxd; Date: 04/19/2011; By: kristin.uber

EXHIBIT C-2

EXHIBIT D

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California	**Log of Boring No. B10c**	
BORING LOCATION: Lat: 37.716731; Long: -122.495103	ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.	DATE STARTED: 11/29/10	DATE FINISHED: 11/29/10
DRILLING METHOD: D rect push	TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT	DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]	LOGGED BY: T. K tzke	
HAMMER WEIGHT: NA / DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
1	B10c-05 B10c-10			0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), 95% fine to medium sand, 5% fines, contains clay pigeon debris	OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	B10c-15 B10c-20			0	▼ no debris present	
3	B10c-30			0		Boring location coordinates are based on North American Datum of 1983.
4				0		
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

EXHIBIT D

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. B12**	
BORING LOCATION: Lat: 37.716518; Long: -122.494672		ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.		DATE STARTED: 11/29/10	DATE FINISHED: 11/29/10
DRILLING METHOD: D rect push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6600		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]		LOGGED BY: G. Stem er	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reactivity w/HCl, geologic interpretation.	REMARKS
					Surface Elevation: Ground surface	
0	B12-05 B12-10			0	ORGANIC MATTER and CLAY PIGEON DEBRIS: (4 inches thick)	
1				0	SILTY SAND (SM): dark olive brown (2.5Y 3/3), moist, 80% fine sand, 20% nonplastic fines, contains organic matter (rootlets)	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	B12-15 B12-20			0		
3	B12-30			0		Boring location coordinates are based on North American Datum of 1983.
4				0	POORLY-GRADED SAND (SP): olive brown (2.5Y 4/4), moist, 95% fine to medium sand, 5% fines	
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. C1**	
BORING LOCATION: Lat: 37.717809; Long: -122.498026		ELEVATION AND DATUM: Not surveyed; datum is ground surface	
DRILLING CONTRACTOR: Vironex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: Direct push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]		LOGGED BY: T. Klitzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter. Surface Elevation: Ground surface	REMARKS
1	C1-0.5			0	POORLY-GRADED SAND (SP): dark yellowish brown (10YR 4/6), 95% fine to medium sand, 5% fines, contains clay pigeon debris no debris present	OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	C1-1.0 C1-1.5			0		Boring location coordinates are based on North American Datum of 1983.
3	C1-2.0 C1-3.0			0		
4				0		
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. C2**	
BORING LOCATION: Lat: 37.717730; Long: -122.497722		ELEVATION AND DATUM: Not surveyed; datum is ground surface	
DRILLING CONTRACTOR: Vironex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: Direct push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]		LOGGED BY: T. Klitzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	REMARKS
					Surface Elevation: Ground surface	
1	C2-0.5	C2-1.0		0	POORLY-GRADED SAND with GRAVEL (SP): dark yellowish brown (10YR 4/6), moist, 95% find to medium sand, 5% fines, contains clay pigeon debris no debris present	OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	C2-1.5	C2-2.0		0		Boring location coordinates are based on North American Datum of 1983.
3	C2-3.0					
4				0		
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. C5**	
BORING LOCATION: Lat: 37.717403; Long: -122.496729		ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: D rect push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]		LOGGED BY: T. K tzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
0	C5-05 C5-10			0	CLAY PIGEON DEBRIS with SAND	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard. Boring location coordinates are based on North American Datum of 1983.
1				0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), moist, 95% fine to medium sand, 5% fines, no debris present	
2	C5-15 C5-20			0		
3	C5-30			0		
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. C9**	
BORING LOCATION: Lat: 37.717008; Long: -122.495447		ELEVATION AND DATUM: Not surveyed; datum is ground surface	
DRILLING CONTRACTOR: Vironex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: Direct push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]		LOGGED BY: T. Klitzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter. Surface Elevation: Ground surface	REMARKS
0	C9-0.5			0	CLAY PIGEON DEBRIS with SILT and SAND	
1	C9-1.0					OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard.
	C9-1.5			0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), 95% fine to medium sand, 5% fines, contains clay pigeon debris no debris present	
2	C9-2.0					
	C9-3.0			0		Boring location coordinates are based on North American Datum of 1983.
3				0		
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. C10**	
BORING LOCATION: Lat: 37.716908; Long: -122.495109		ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.		DATE STARTED: 11/29/10	DATE FINISHED: 11/29/10
DRILLING METHOD: D rect push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]		LOGGED BY: T. K tzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	REMARKS
					Surface Elevation: Ground surface	
1	C10-0 5 C10-1 0			0	SILTY GRAVEL w th SAND (GM): very dark gray sh brown (10YR 3/2), mo st, 60% f ne grave , 20% f ne to coarse sand, 20% nonp ast c f nes, conta ns c ay p geon debr s	OVM = M n RAE 2000 PID ca brated w th 100 ppm sobuty ene standard.
2	C10-1 5 C10-2 0			0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), mo st, 95% f ne to med um sand, 5% f nes, no debr s present	Bor ng ocat on coord nates are based on North Amer can Datum of 1983.
3	C10-3 0			0		
4				0		
5				0	Bottom of bor ng at 5.0 feet	Boreho e destroyed us ng Type I-II neat cement grout p aced from tota depth to ground surface.
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PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. C13**	
BORING LOCATION: Lat: 37.716527; Long: -122.494201		ELEVATION AND DATUM: Not surveyed; datum is ground surface	
DRILLING CONTRACTOR: Vironex, Inc.		DATE STARTED: 11/29/10	DATE FINISHED: 11/29/10
DRILLING METHOD: Direct push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]		LOGGED BY: T. Klitzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interpretation.	REMARKS
					Surface Elevation: Ground surface	
1	C13-05 C13-10			0	POORLY-GRADED SAND (SP): dark reddish brown (5YR 3/2), moist, 95% fine to medium sand, 5% fines, contains clay pigeon debris	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard.
					▼ no debris present	
2	C13-15 C13-20			0		
3	C13-30			0	▼ dark yellowish brown (10YR 4/6)	Boring location coordinates are based on North American Datum of 1983.
				0		
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5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California	**Log of Boring No. C14**
BORING LOCATION: Lat: 37.716389; Long: -122.493924	ELEVATION AND DATUM: Not surveyed; datum s ground surface
DRILLING CONTRACTOR: V ronex, Inc.	DATE STARTED: 11/29/10 / DATE FINISHED: 11/29/10
DRILLING METHOD: D rect push	TOTAL DEPTH (ft.): 5.0 / MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT	DEPTH TO WATER (ft.) — FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]	LOGGED BY: T. K tzke
HAMMER WEIGHT: NA / DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman / REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
1	C14-05 C14-10			0	POORLY-GRADED SAND (SP): dark reddish brown (5YR 3/2), moist, 95% fine to medium sand, 5% fines, contains clay pigeon debris	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	C14-15 C14-20			0		
3	C14-30			0	dark yellowish brown (10YR 4/6), no debris present	Boring location coordinates are based on North American Datum of 1983.
4				0		
5				0	Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California	**Log of Boring No. D2**	
BORING LOCATION: Lat: 37.717974; Long: -122.497610	ELEVATION AND DATUM: Not surveyed; datum is ground surface	
DRILLING CONTRACTOR: Vironex, Inc.	DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: Direct push	TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT	DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]	LOGGED BY: T. Klitzke	
HAMMER WEIGHT: NA / DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	REMARKS
					Surface Elevation: Ground surface	
1	D2-05 D2-10			0	POORLY-GRADED SAND (SP): dark yellowish brown (10YR 4/4), moist, 95% fine to medium sand, 5% fines, contains clay pigeon debris	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	D2-15 D2-20			0	▼ no debris present	Boring location coordinates are based on North American Datum of 1983.
3	D2-30			0		
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. D4**	
BORING LOCATION: Lat: 37.717684; Long: -122.496901		ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: D rect push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]		LOGGED BY: T. K tzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
1	D4-05 D4-10			0	CLAY PIGEON DEBRIS with SAND	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard. Boring location coordinates are based on North American Datum of 1983.
2	D4-15 D4-20					
3	D4-30			0 0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), moist, 95% fine to medium sand, 5% fines, no debris present	
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California	**Log of Boring No. D5**
BORING LOCATION: Lat: 37.717601; Long: -122.496583	ELEVATION AND DATUM: Not surveyed; datum s ground surface
DRILLING CONTRACTOR: V ronex, Inc.	DATE STARTED: 11/30/10 / DATE FINISHED: 11/30/10
DRILLING METHOD: D rect push	TOTAL DEPTH (ft.): 5.0 / MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT	DEPTH TO WATER (ft.) — FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]	LOGGED BY: T. K tzke
HAMMER WEIGHT: NA / DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman / REG. NO.: PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interpretation.	REMARKS
					Surface Elevation: Ground surface	
1	D5-05 D5-10				CLAY PIGEON DEBRIS with SAND	
2	D5-15 D5-20					Boring location coordinates are based on North American Datum of 1983.
3	D5-30				POORLY-GRADED SAND (SP): dark brown (10YR 3/3), moist, 95% fine to medium sand, 5% fines, no debris present	
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. D6**	
BORING LOCATION: Lat: 37.717439; Long: -122.496355		ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: D rect push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]		LOGGED BY: T. K tzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
1	D6-05 D6-10			0	CLAY PIGEON DEBRIS with SAND	OVM = Mini RAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	D6-15 D6-20			0	POORLY-GRADED SAND (SP): dark yellowish brown (10YR 4/4), moist, 95% fine to medium sand, 5% fines, no debris present	Boring location coordinates are based on North American Datum of 1983.
3	D6-30			0		Advanced adjacent companion boring to 4 feet bgs to collect additional material.
4						
5					Bottom of boring at 5.0 feet	
6						Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. D8**	
BORING LOCATION: Lat: 37.717214; Long: -122.495659		ELEVATION AND DATUM: Not surveyed; datum is ground surface	
DRILLING CONTRACTOR: Vironex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: Direct push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]		LOGGED BY: T. Klitzke	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): co or, mo st, % by wt., p ast. dens ty, structure, cementat on, react. w/HC , geo. nter.	REMARKS
					Surface E evat on: Ground surface	
1	D8-0 5 D8-1 0			0	CLAY PIGEON DEBRIS w th SAND and SILT	OVM = M n RAE 2000 PID ca brated w th 100 ppm sobuty ene standard.
2	D8-1 5 D8-2 0			0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), mo st, 95% f ne to med um sand, 5% f nes, no debr s present	Bor ng ocat on coord nates are based on North Amer can Datum of 1983.
3	D8-3 0			0	brown (10YR 4/3)	
4				0		
5					Bottom of bor ng at 5.0 feet	Boreho e destroyed us ng Type I-II neat cement grout p aced from tota depth to ground surface.
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OAKBOREV (REV. 6/2008)

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California	**Log of Boring No. D9**
BORING LOCATION: Lat: 37.717129; Long: -122.495413	ELEVATION AND DATUM: Not surveyed; datum is ground surface
DRILLING CONTRACTOR: Vironex, Inc.	DATE STARTED: 11/30/10 / DATE FINISHED: 11/30/10
DRILLING METHOD: Direct push	TOTAL DEPTH (ft.): 5.0 / MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6610 DT	DEPTH TO WATER (ft.) — FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dual-tube system [5' x 2"]	LOGGED BY: T. Klitzke
HAMMER WEIGHT: NA / DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman / REG. NO.: PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	REMARKS
					Surface Elevation: Ground surface	
0	C8-0.5	C8-1.0		0	CLAY PIGEON DEBRIS with SILT and SAND	OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard. Boring location coordinates are based on North American Datum of 1983.
1				0	POORLY-GRADED SAND (SP): dark brown (10YR 3/3), moist, 95% fine to medium sand, 5% fines, contains clay pigeon debris no debris present	
2	C8-1.5	C8-2.0		0		
3	C8-3.0			0		
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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EXHIBIT E

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California		**Log of Boring No. B5a**	
BORING LOCATION: Lat: 37.717137; Long: -122.496849		ELEVATION AND DATUM: Not surveyed; datum s ground surface	
DRILLING CONTRACTOR: V ronex, Inc.		DATE STARTED: 11/30/10	DATE FINISHED: 11/30/10
DRILLING METHOD: D rect push		TOTAL DEPTH (ft.): 5.0	MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6600		DEPTH TO WATER (ft.)	FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]		LOGGED BY: N. F tch	
HAMMER WEIGHT: NA	DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman	REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plasticity, density, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
0	B5a-05 B5a-10			0	ASPHALTIC CONCRETE: (3 inches thick)	
				0	AGGREGATE BASE AND ORGANIC MATTER: (2 inches thick)	
1	B5a-15 B5a-20			0	CLAYEY SAND (SC): dark yellowish brown (10YR 4/6), mottled with yellowish red (5YR 4/6), moist, 65% fine sand, 35% medium plasticity fines, no organic matter present	OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard.
2				0		Boring location coordinates are based on North American Datum of 1983.
3	B5a-30			0		
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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OAKBOREV (REV. 6/2008)

EXHIBIT E

PROJECT: PACIFIC ROD AND GUN CLUB San Francisco, California	**Log of Boring No. B5b**
BORING LOCATION: Lat: 37.717115; Long: -122.497107	ELEVATION AND DATUM: Not surveyed; datum s ground surface
DRILLING CONTRACTOR: V ronex, Inc.	DATE STARTED: 11/30/10 / DATE FINISHED: 11/30/10
DRILLING METHOD: D rect push	TOTAL DEPTH (ft.): 5.0 / MEASURING POINT: Ground surface
DRILLING EQUIPMENT: Geoprobe 6600	DEPTH TO WATER (ft.) — FIRST: NA / COMPL.: NA
SAMPLING METHOD: Dua -tube system [5' x 2"]	LOGGED BY: N. F tch
HAMMER WEIGHT: NA / DROP: NA	RESPONSIBLE PROFESSIONAL: C. Dowman / REG. NO. PG 8659

DEPTH (feet)	SAMPLES: Sample No.	SAMPLES: Sample	SAMPLES: Blows/Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moisture, % by wt., plasticity, structure, cementation, reaction w/HCl, geologic interface.	REMARKS
					Surface Elevation: Ground surface	
					ASPHALTIC CONCRETE: (3 inches thick)	
					AGGREGATE BASE: (1 inch thick)	
1	B5b-0.5	B5b-1.0		0	CLAYEY SAND (SC): olive brown (2.5Y 4/4) mottled with dark reddish brown (5YR 3/4), moist, 80% find sand, 20% medium plasticity fines	OVM = MiniRAE 2000 PID calibrated with 100 ppm isobutylene standard.
2	B5b-1.5	B5b-2.0		0		
3	B5b-3.0			0		Boring location coordinates are based on North American Datum of 1983.
4						
5					Bottom of boring at 5.0 feet	Borehole destroyed using Type I-II neat cement grout placed from total depth to ground surface.
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EXHIBIT F

TABLE 6

SOIL ANALYTICAL DATA: PAHs [1]
Pacific Rod and Gun Club
San Francisco, California

Results reported in micrograms per kilogram (µg/kg)

Sample Location	Sample ID	Depth (ft bgs)	Date	Acenaph-thene	Acenaph-thylene	Anthra-cene	Benzo (a) Anthracene	Benzo (a) Pyrene	Benzo (b) Fluoranthene	Benzo (g,h,i) Perylene	Benzo (k) Fluoranthene	Chrysene	Dibenz (a,h) Anthracene	Fluoran-thene	Fluorene	Indeno-(1,2,3-cd)-pyrene	Naphtha-lene	Phenan-threne	Pyrene	BaPe [2]
Benzo(a)Pyrene Potency Equivalent Factor (PEF)				**NA**	**NA**	**NA**	**0.1**	**1**	**0.1**	**NA**	**0.1**	**0.01**	**0.34**	**NA**	**NA**	**0.1**	**NA**	**NA**	**NA**	**NA**
Pacific Rod and Gun Club Samples																				
A2	A2-0.5 <60	0.5	11/30/2010	**500**	<200	**420**	**5200**	**9700**	**7900**	**6600**	**5900**	**7100**	**1800**	**4900**	<200	**5900**	<200	**1600**	**6900**	**13000**
A2	A2-1.0 <60	1	11/30/2010	<5	<5	<5	**36**	**57**	**66**	**44**	**30**	**50**	**13**	**38**	<5	**33**	<5	**12**	**43**	**78**
A2	A2-1.5 <60	1.5	11/30/2010	<5	<5	<5	**11**	**14**	**17**	**11**	**7.3**	**13**	<5	**9.8**	<5	**9.8**	<5	<5	**11**	**19**
A3	A3-0.5 <60	0.5	11/30/2010	**5.2**	<5	**11**	**73**	**120**	**160**	**77**	**48**	**110**	**23**	**76**	<5	**71**	<5	**25**	**94**	**160**
A3	A3-1.0 <60	1	11/30/2010	<4.9	<4.9	<4.9	**8.8**	**11**	**15**	**9.1**	**5.2**	**9.8**	<4.9	**7.6**	<4.9	**8.1**	<4.9	<4.9	**8.3**	**16**
A3	A3-1.5 <60	1.5	11/30/2010	<5	<5	<5	**10**	**12**	**14**	**9.6**	**6.9**	**11**	<5	**9.4**	<5	**8.3**	<5	<5	**11**	**17**
A4	A4-0.5 <60	0.5	11/30/2010	**7400**	<2000	**8800**	**85000**	**140000**	**120000**	**99000**	**99000**	**110000**	**30000**	**94000**	<2000	**95000**	<2000	**33000**	**110000**	**191000**
A4	A4-1.0 <60	1	11/30/2010	**180**	<50	**170**	**2000**	**3300**	**3800**	**2400**	**1300**	**2400**	**610**	**2100**	<50	**2000**	<50	**620**	**2300**	**4400**
A4	A4-1.5 <60	1.5	11/30/2010	**76**	<25	**73**	**790**	**1300**	**1400**	**930**	**600**	**970**	**210**	**870**	<25	**780**	<25	**260**	**920**	**1700**
A4	A4-3.0 <60	3	11/30/2010	<5	<5	<5	**13**	**19**	**22**	**14**	**11**	**15**	<5	**13**	<5	**11**	<5	<5	**15**	**26**
A5a	A5a-0.5 <60	0.5	11/30/2010	**130**	<25	**100**	**1500**	**750**	**2500**	**1800**	**1900**	**2100**	**530**	**1600**	**27**	**1600**	<25	**420**	**1800**	**1700**
A5a	A5a-1.0 <60	1	11/30/2010	<5	<5	<5	<5	**6.3**	**5**	**5.1**	**5.7**	**6**	<5	<5	<5	**5.4**	<5	<5	**5.2**	**9**
A5a	A5a-1.5 <60	1.5	11/30/2010	<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	<4.9	<4.9	**ND**
A5b	A5b-0.5 <60	0.5	11/30/2010	**25**	<5	**25**	**320**	**600**	**560**	**440**	**390**	**480**	**130**	**330**	**6.5**	**380**	**5.9**	**120**	**420**	**810**
A5b	A5b-1.0 <60	1	11/30/2010	**9.3**	<4.9	**39**	**220**	**290**	**280**	**190**	**230**	**260**	**58**	**350**	**6.1**	**180**	<4.9	**160**	**330**	**400**
A5b	A5b-1.5 <60	1.5	11/30/2010	<5	<5	<5	**11**	**22**	**19**	**20**	**16**	**17**	**5.7**	**14**	<5	**16**	<5	**5**	**16**	**30**
A6	A6-0.5 <60	0.5	11/30/2010	<5	<5	**7.3**	**64**	**89**	**110**	**59**	**46**	**87**	**17**	**79**	<5	**51**	<5	**30**	**91**	**120**
A6	A6-1.0 <60	1	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A6	A6-1.5 <60	1.5	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A7	A7-0.5 <60	0.5	11/30/2010	<99	<99	<99	**160**	**210**	**240**	**150**	**120**	**190**	<99	**160**	<99	**120**	<99	<99	**180**	**290**
A7	A7-1.0 <60	1	11/30/2010	<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	<4.9	<4.9	**ND**
A7	A7-1.5 <60	1.5	11/30/2010	<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	<4.9	<4.9	**ND**
A8	A8-0.5 <60	0.5	11/30/2010	<150	<150	<150	**380**	**560**	**800**	**230**	**260**	**570**	<150	**370**	<150	**190**	<150	**170**	**540**	**750**
A8	A8-1.0 <60	1	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A8	A8-1.5 <60	1.5	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A9	A9-0.5 <60	0.5	11/29/2010	<25	<25	<25	**83**	**120**	**140**	**85**	**54**	**110**	**26**	**98**	<25	**76**	<25	**39**	**150**	**170**
A9	A9-1.0 <60	1	11/29/2010	<820	<820	<820	**5900**	**10000**	**10000**	**7000**	**4900**	**7500**	**1900**	**6100**	<820	**6100**	<820	**1900**	**8500**	**13000**
A9	A9-1.5 <60	1.5	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A10a	A10a-0.5 <60	0.5	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A10a	A10a-1.0 <60	1	11/29/2010	<4.9	<4.9	<4.9	**8.6**	**13**	**15**	**9.4**	**5.5**	**10**	<4.9	**7.9**	<4.9	**8.3**	<4.9	<4.9	**12**	**18**
A10a	A10a-1.5 <60	1.5	11/29/2010	<5	<5	<5	<5	**5.3**	**5.9**	<5	<5	<5	<5	<5	<5	<5	<5	<5	**5.2**	**8**
A10b	A10b-0.5 <60	0.5	11/29/2010	<250	<250	<250	**1300**	**2300**	**1900**	**1600**	**1600**	**1700**	**600**	**1600**	<250	**1400**	<250	**550**	**1800**	**3100**
A10b	A10b-1.0 <60	1	11/29/2010	**55**	<5	**38**	**380**	**660**	**450**	**410**	**530**	**500**	**150**	**430**	**13**	**400**	**8.6**	**170**	**510**	**890**
A10b	A10b-1.5 <60	1.5	11/29/2010	**8.9**	<5	**6.5**	**63**	**110**	**88**	**74**	**81**	**86**	**22**	**77**	<5	**73**	<5	**31**	**92**	**150**
A10b	A10b-3.0 <60	3	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A11a	A11a-0.5 <60	0.5	11/29/2010	**660**	<500	**780**	**5900**	**12000**	**11000**	**5700**	**5300**	**8300**	**1800**	**6000**	<500	**5400**	<500	**1900**	**8500**	**15000**
A11a	A11a-1.0 <60	1	11/29/2010	**610**	<500	**700**	**5400**	**11000**	**11000**	**5300**	**5100**	**7800**	**1600**	**6300**	<500	**5000**	<500	**1800**	**7800**	**14000**
A11a	A11a-1.5 <60	1.5	11/29/2010	**710**	<470	**710**	**6500**	**11000**	**13000**	**7700**	**4200**	**8200**	**2200**	**7000**	<470	**6400**	<470	**2300**	**9400**	**15000**
A11a	A11a-3.0 <60	3	11/29/2010	<5	<5	<5	**5.4**	**6.6**	**7.9**	<5	<5	**5.1**	<5	<5	<5	<5	<5	<5	**5.2**	**9.3**
A11b	A11b-0.5 <60	0.5	11/29/2010	**120**	<99	**110**	**1100**	**2000**	**1500**	**1300**	**1400**	**1600**	**390**	**1400**	<99	**1200**	<99	**510**	**1600**	**2700**
A11b	A11b-1.0 <60	1	11/29/2010	**150**	<99	**130**	**1300**	**2200**	**1600**	**1400**	**1700**	**1700**	**490**	**1500**	<99	**1300**	<99	**550**	**1800**	**3000**
A11b	A11b-1.5 <60	1.5	11/29/2010	**16**	<4.9	**15**	**140**	**230**	**180**	**140**	**170**	**180**	**51**	**160**	<4.9	**130**	<4.9	**67**	**190**	**310**
A11b	A11b-3.0 <60	3	11/29/2010	<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	<4.9	<4.9	**ND**
A11c	A11c-0.5 <60	0.5	11/29/2010	**690**	<200	**690**	**6700**	**12000**	**13000**	**8200**	**4300**	**8300**	**2200**	**7100**	<200	**6900**	<200	**2300**	**9900**	**16000**
A11c	A11c-1.0 <60	1	11/29/2010	<5	<5	**6.5**	**44**	**62**	**75**	**43**	**28**	**52**	**13**	**55**	<5	**36**	<5	**24**	**68**	**85**
A11c	A11c-1.5 <60	1.5	11/29/2010	<5	<5	<5	**27**	**52**	**51**	**26**	**27**	**40**	**7.8**	**29**	<5	**23**	<5	**9.1**	**36**	**68**
A11c	A11c-3.0 <60	3	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A11d	A11d-0.5 <60	0.5	11/30/2010	**55**	<50	**51**	**440**	**690**	**600**	**460**	**570**	**590**	**150**	**570**	<50	**430**	<50	**220**	**660**	**950**
A11d	A11d-1.0 <60	1	11/30/2010	<4.9	<4.9	<4.9	**35**	**58**	**49**	**42**	**48**	**47**	**12**	**43**	<4.9	**40**	<4.9	**17**	**51**	**80**
A11d	A11d-1.5 <60	1.5	11/30/2010	<5	<5	<5	**16**	**24**	**24**	**16**	**17**	**19**	**5.8**	**19**	<5	**17**	<5	**7.7**	**20**	**34**

EXHIBIT F

TABLE 6

SOIL ANALYTICAL DATA: PAHs [1]
Pacific Rod and Gun Club
San Francisco, California

Results reported in micrograms per kilogram (µg/kg)

Sample Location	Sample ID	Depth (ft bgs)	Date	Acenaph-thene	Acenaph-thylene	Anthra-cene	Benzo (a) Anthracene	Benzo (a) Pyrene	Benzo (b) Fluoranthene	Benzo (g,h,i) Perylene	Benzo (k) Fluoranthene	Chrysene	Dibenz (a,h) Anthracene	Fluoran-thene	Fluorene	Indeno-(1,2,3-cd)-pyrene	Naphtha-lene	Phenan-threne	Pyrene	BaPe [2]
Benzo(a)Pyrene Potency Equivalent Factor (PEF)				**NA**	**NA**	**NA**	**0.1**	**1**	**0.1**	**NA**	**0.1**	**0.01**	**0.34**	**NA**	**NA**	**0.1**	**NA**	**NA**	**NA**	**NA**
A11e	A11e-0.5 <60	0.5	11/30/2010	<50	<50	<50	**230**	**390**	**300**	**250**	**310**	**300**	**95**	**280**	<50	**250**	<50	**99**	**310**	**530**
A11e	A11e-1.0 <60	1	11/30/2010	<5	<5	<5	<5	**6.5**	**5.6**	<5	<5	**5.6**	<5	<5	<5	<5	<5	<5	**5.6**	**9**
A11e	A11e-1.5 <60	1.5	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A12a	A12a-0.5 <60	0.5	11/29/2010	**36**	<25	**34**	**290**	**560**	**560**	**270**	**310**	**430**	**75**	**360**	<25	**260**	<25	**110**	**450**	**730**
A12a	A12a-1.0 <60	1	11/29/2010	<5	<5	<5	**13**	**22**	**21**	**16**	**16**	**13**	**6.3**	**13**	<5	**17**	<5	<5	**16**	**31**
A12a	A12a-1.5 <60	1.5	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A12b	A12b-0.5 <60	0.5	11/29/2010	<500	<500	<500	**4400**	**7300**	**8600**	**5300**	**2900**	**5600**	**1400**	**4800**	<500	**4400**	<500	**1600**	**6300**	**9900**
A12b	A12b-1.0 <60	1	11/29/2010	<5	<5	<5	**34**	**60**	**51**	**42**	**46**	**49**	**12**	**49**	<5	**39**	<5	**22**	**60**	**82**
A12b	A12b-1.5 <60	1.5	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
A13	A13-0.5 <60	0.5	11/29/2010	**200**	<99	**220**	**2000**	**3900**	**3400**	**2300**	**1400**	**2800**	**640**	**2000**	<99	**1900**	<99	**630**	**2600**	**5000**
A13	A13-1.0 <60	1	11/29/2010	<5	<5	<5	**67**	**97**	**93**	**74**	**64**	**69**	**24**	**56**	<5	**70**	<5	**17**	**70**	**140**
A13	A13-1.5 <60	1.5	11/29/2010	<5	<5	<5	**24**	**40**	**39**	**29**	**24**	**25**	**9.4**	**19**	<5	**29**	<5	**6.3**	**26**	**55**
A13	A13-3.0 <60	3	11/29/2010	<5	<5	<5	**6.2**	**12**	**8.7**	**6.5**	**7**	**5.9**	<5	**5.2**	<5	**7.7**	<5	<5	**6.4**	**16**
A14	A14-0.5 <60	0.5	11/29/2010	**4600**	<2000	**4900**	**45000**	**83000**	**79000**	**53000**	**35000**	**61000**	**11000**	**45000**	<2000	**43000**	<2000	**14000**	**59000**	**110000**
A14	A14-1.0 <60	1	11/29/2010	**270**	<99	**280**	**2700**	**5100**	**5000**	**3200**	**2200**	**3600**	**920**	**2800**	<99	**2600**	<99	**840**	**3600**	**6700**
A14	A14-1.5 <60	1.5	11/29/2010	<5	<5	<5	**20**	**27**	**31**	**19**	**19**	**19**	**7.3**	**23**	<5	**21**	<5	**8.4**	**25**	**39**
A14	A14-3.0 <60	3	11/29/2010	<5	<5	<5	**9.7**	**16**	**14**	**10**	**9.4**	**9.5**	<5	**9.5**	<5	**12**	<5	<5	**11**	**21**
A15	A15-0.5 <60	0.5	11/29/2010	**230**	<200	**230**	**2200**	**3700**	**4400**	**2600**	**1500** J	**2800**	**720**	**2300**	<200	**2200**	<200	**750**	**3400**	**5000**
A15	A15-1.0 <60	1	11/29/2010	**140**	<50	**140**	**1100**	**2200**	**2200**	**970**	**1100** J	**1600**	**300**	**1300**	<50	**900**	<50	**440**	**1600**	**2800**
A15	A15-1.5 <60	1.5	11/29/2010	**290**	<100	**240**	**2100**	**3500**	**3700**	**2200**	**1800** J	**2600**	**620**	**2300**	<100	**2000**	<100	**830**	**3200**	**4700**
A15	A15-3.0 <60	3	11/29/2010	<5	<5	<5	**28**	**36**	**47**	**21**	**17**	**31**	**6.3**	**36**	<5	**18**	<5	**15**	**37**	**49**
B1	B1-0.5 <60	0.5	11/30/2010	<57	<57	<57	**240**	**350**	**350**	**190**	**130** J	**310**	<57	**280**	<57	**170**	<57	**100** J	**350**	**450**
B1	B1-1.0 <60	1	11/30/2010	<5	<5	**8.6**	**66**	**85**	**93**	**71**	**76**	**83**	**23**	**84**	<5	**70**	<5	**37**	**84**	**120**
B1	B1-1.5 <60	1.5	11/30/2010	<4.9	<4.9	<4.9	**6.6**	**8.6**	**8.1**	**6.9**	**8.1**	**8.2**	<4.9	**7**	<4.9	**6.4**	<4.9	<4.9	**7.6**	**12**
B2	B2-0.5 <60	0.5	11/30/2010	<4.9	<4.9	<4.9	**50**	**75**	**85**	**65**	**67**	**74**	**18**	**54**	<4.9	**61**	<4.9	**18**	**65**	**110**
B2	B2-1.0 <60	1	11/30/2010	<5	<5	<5	<5	**5.9**	**5.1**	**5**	**6.1**	**5.4**	<5	<5	<5	<5	<5	<5	<5	**8**
B2	B2-1.5 <60	1.5	11/30/2010	<5	<5	<5	**5**	**6.7**	**5.9**	**5.8**	**7**	**6.5**	<5	<5	<5	**5.6**	<5	<5	**5.5**	**10**
B3	B3-0.5 <60	0.5	12/2/2010	<4.9	<4.9	<4.9	**17**	**28**	**25**	**24**	**25**	**25**	**5**	**16**	<4.9	**23** J	<4.9	**5.7**	**21**	**39**
B3	B3-1.0 <60	1	12/2/2010	<5	<5	<5	**5.2**	**8.1**	**7.2**	**6.6**	**7.5**	**7.7**	<5	<5	<5	**5.5** J	<5	<5	**5.7**	**12**
B3	B3-1.5 <60	1.5	12/2/2010	<5	<5	<5	<5	<5	**5.6**	<5	<5	**5**	<5	<5	<5	<5 UJ	<5	<5	<5	**5**
B4	B4-0.5 <60	0.5	11/30/2010	<250	<250	<250	**510**	**860**	**620**	**740**	**610**	**710**	<250	**390**	<250	**570**	<250	<250	**540**	**1100**
B4	B4-1.0 <60	1	11/30/2010	<5	<5	<5	**14**	**25**	**17**	**16**	**18**	**19**	**5.7**	**14**	<5	**14**	<5	**5.4**	**20**	**33**
B4	B4-1.5 <60	1.5	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
B5a	B5a-0.5 <60	0.5	11/30/2010	**5.5**	<4.9	**9.1**	**99**	**170**	**130**	**110**	**120**	**130**	**35**	**110**	<4.9	**100**	<4.9	**39**	**130**	**230**
B5a	B5a-1.0 <60	1	11/30/2010	<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	<4.9	<4.9	**ND**
B5a	B5a-1.5 <60	1.5	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
B5b	B5b-0.5 <60	0.5	11/30/2010	<5	<5	<5	**9.7**	**18**	**13**	**14**	**14**	**14**	<5	**10**	<5	**12**	<5	<5	**13**	**24**
B5b	B5b-1.0 <60	1	11/30/2010	<5	<5	<5	<5	**7.9**	**5.2**	**6.4**	**6.7**	**6.4**	<5	<5	<5	**5.4**	<5	<5	**6**	**11**
B5b	B5b-1.5 <60	1.5	11/30/2010	<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	<4.9	<4.9	**ND**
B5c	B5c-0.5 <60	0.5	11/30/2010	<2500	<2500	**6400**	**23000**	**24000**	**24000**	**15000**	**21000**	**27000**	**3700**	**48000**	<2500	**15000**	<2500	**23000**	**40000**	**34000**
B5c	B5c-1.0 <60	1	11/30/2010	<4.9	<4.9	**7.5**	**30**	**31**	**32**	**19**	**27**	**34**	**8**	**60**	<4.9	**19**	<4.9	**30**	**54**	**45**
B5c	B5c-1.5 <60	1.5	11/30/2010	<5	<5	<5	**5.6**	<5	**6**	<5	<5	<5	<5	**8.9**	<5	<5	<5	<5	**7.4**	**5**
B6	B6-0.5 <60	0.5	11/30/2010	**340**	<300	**370**	**3800**	**6400**	**5500**	**4800**	**5200**	**5300**	**1500**	**4600**	<300	**4500**	<300	**1800**	**5600**	**8900**
B6	B6-1.0 <60	1	11/30/2010	<5	<5	<5	**41**	**72**	**70**	**64**	**60**	**60**	**19**	**51**	<5	**60**	<5	**19**	**63**	**100**
B6	B6-1.5 <60	1.5	11/30/2010	<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	<4.9	<4.9	**ND**
B7	B7-0.5 <60	0.5	11/30/2010	**200**	<130	**220**	**2500**	**4200**	**5200**	**2900**	**1700**	**3500**	**800**	**2800**	<130	**2300**	<130	**950**	**3300**	**5700**
B7	B7-1.0 <60	1	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
B7	B7-1.5 <60	1.5	11/30/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
B8	B8-0.5 <60	0.5	11/30/2010	**1200**	<500	**1200**	**13000**	**20000**	**24000**	**14000**	**8100**	**15000**	**3800**	**14000**	<500	**12000**	<500	**4500**	**15000**	**27000**
B8	B8-1.0 <60	1	11/30/2010	**72**	<25	**56**	**680**	**1200**	**1500**	**740**	**580**	**860**	**210**	**740**	<25	**680**	<25	**220**	**860**	**1600**
B8	B8-1.5 <60	1.5	11/30/2010	**18**	<5	**13**	**180**	**340**	**420**	**250**	**140**	**230**	**67**	**210**	<5	**230**	<5	**59**	**240**	**460**
B8	B8-3.0 <60	3	11/30/2010	**8.8**	<5	**5.7**	**79**	**150**	**180**	**94**	**65**	**110**	**24**	**87**	<5	**86**	<5	**25**	**100**	**200**

TABLE 6

SOIL ANALYTICAL DATA: PAHs [1]
Pacific Rod and Gun Club
San Francisco, California

Results reported in micrograms per kilogram (µg/kg)

Sample Location	Sample ID	Depth (ft bgs)	Date	Acenaph-thene	Acenaph-thylene	Anthra-cene	Benzo (a) Anthracene	Benzo (a) Pyrene	Benzo (b) Fluoranthene	Benzo (g,h,i) Perylene	Benzo (k) Fluoranthene	Chrysene	Dibenz (a,h) Anthracene	Fluoran-thene	Fluorene	Indeno-(1,2,3-cd)-pyrene	Naphtha-lene	Phenan-threne	Pyrene	BaPe [2]
Benzo(a)Pyrene Potency Equivalent Factor (PEF)				**NA**	**NA**	**NA**	**0.1**	**1**	**0.1**	**NA**	**0.1**	**0.01**	**0.34**	**NA**	**NA**	**0.1**	**NA**	**NA**	**NA**	**NA**
B9	B9-0.5 <60	0.5	11/29/2010	<200	<200	**480**	**2900**	**3800**	**3400**	**2400**	**3200**	**3600**	**880**	**4600**	<200	**2300**	<200	**2300**	**4700**	**5300**
B9	B9-1.0 <60	1	11/29/2010	**9.9**	<5	**64**	**300**	**330**	**340**	**190**	**260**	**340**	**75**	**500**	**8.5**	**180**	<5	**270**	**480**	**467**
B9	B9-1.5 <60	1.5	11/29/2010	<5	<5	<5	**9.4**	**15**	**14**	**11**	**13**	**13**	<5	**11**	<5	**11**	<5	<5	**14**	**21**
B10a	B10a-0.5 <60	0.5	11/29/2010	<50	<50	**62**	**630**	**1000**	**970**	**730**	**800**	**900**	**260**	**870**	<50	**660**	<50	**350**	**990**	**1400**
B10a	B10a-1.0 <60	1	11/29/2010	**5.5**	<5	**6**	**55**	**94**	**76**	**64**	**74**	**75**	**23**	**71**	<5	**59**	<5	**28**	**81**	**130**
B10a	B10a-1.5 <60	1.5	11/29/2010	<5	<5	<5	<5	**5.2**	<5	<5	<5	**5.3**	<5	**5.1**	<5	<5	<5	<5	**5.8**	**7**
B10b	B10b-0.5 <60	0.5	11/29/2010	**6600**	<2500	**6000**	**59000**	**100000**	**110000**	**64000**	**38000**	**71000**	**20000**	**63000**	<2500	**55000**	<2500	**21000**	**82000**	**130000**
B10b	B10b-1.0 <60	1	11/29/2010	**110**	<110	**110**	**1000**	**1700**	**1800**	**1300**	**820**	**1300**	**360**	**1100**	<110	**1100**	<110	**370**	**1500**	**2300**
B10b	B10b-1.5 <60	1.5	11/29/2010	**6.3**	<5	**5.5**	**54**	**89**	**110**	**64**	**36**	**67**	**20**	**57**	<5	**54**	<5	**19**	**81**	**120**
B10b	B10b-3.0 <60	3	11/29/2010	<5	<5	<5	**37**	**60**	**63**	**42**	**27**	**44**	**11**	**36**	<5	**33**	<5	**12**	**43**	**80**
B10c	B10c-0.5 <60	0.5	11/29/2010	<5000	<5000	<5000	**54000**	**80000**	**89000**	**56000**	**34000**	**63000**	**14000**	**55000**	<5000	**43000**	<5000	**17000**	**59000**	**110000**
B10c	B10c-1.0 <60	1	11/29/2010	**590**	<250	**490**	**5200**	**8900**	**6900**	**5800**	**6500**	**6800**	**1900**	**5800**	<250	**5300**	<250	**2200**	**6800**	**12000**
B10c	B10c-1.5 <60	1.5	11/29/2010	**150**	<99	**120**	**1400**	**2400**	**1900**	**1600**	**1800**	**1800**	**510**	**1500**	<99	**1500**	<99	**470**	**1800**	**3300**
B10c	B10c-3.0 <60	3	11/29/2010	<5	<5	<5	**24**	**38**	**49**	**27**	**18**	**30**	**8.1**	**26**	<5	**23**	<5	**9.1**	**31**	**52**
B11a	B11a-0.5 <60	0.5	11/29/2010	**3100**	<1800	**3400**	**28000**	**56000**	**52000**	**31000**	**27000**	**38000**	**9800**	**28000**	<1800	**29000**	<1800	**7900**	**36000**	**73000**
B11a	B11a-1.0 <60	1	11/29/2010	**610**	<250	**540**	**5400**	**9700**	**10000**	**6900**	**4600**	**7100**	**1800**	**5800**	<250	**5600**	<250	**1900**	**8300**	**13000**
B11a	B11a-1.5 <60	1.5	11/29/2010	**85**	<25	**80**	**810**	**1400**	**1700**	**990**	**550**	**1000**	**290**	**910**	<25	**830**	<25	**290**	**1200**	**2000**
B11a	B11a-3.0 <60	3	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
B11b	B11b-0.5 <60	0.5	11/29/2010	**4700**	<2500	**4300**	**42000**	**70000**	**76000**	**50000**	**33000**	**52000**	**13000**	**43000**	<2500	**43000**	<2500	**14000**	**62000**	**94000**
B11b	B11b-1.0 <60	1	11/29/2010	**54**	<25	**55**	**460**	**750**	**840**	**550**	**350**	**570**	**150**	**510**	<25	**460**	<25	**160**	**680**	**1000**
B11b	B11b-1.5 <60	1.5	11/29/2010	**65**	<25	**71**	**510**	**940**	**980**	**460**	**430**	**670**	**140**	**590**	<25	**410**	<25	**180**	**720**	**1200**
B11b	B11b-3.0 <60	3	11/29/2010	<5	<5	<5	<5	**5.5**	**6.5**	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**7.8**
B12	B12-0.5 <60	0.5	11/29/2010	<1200	<1200	**1300**	**8900**	**18000**	**16000**	**9600**	**9600**	**12000**	**2700**	**8800**	<1200	**8800**	<1200	**2600**	**11000**	**23000**
B12	B12-1.0 <60	1	11/29/2010	**34**	<9.9	**30**	**330**	**610**	**670**	**440**	**230**	**430**	**120**	**330**	<9.9	**380**	<9.9	**120**	**510**	**820**
B12	B12-1.5 <60	1.5	11/29/2010	<4.9	<4.9	<4.9	**29**	**52**	**41**	**38**	**36**	**40**	**11**	**29**	<4.9	**35**	<4.9	**10**	**38**	**70**
B12	B12-3.0 <60	3	11/29/2010	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	**ND**
B13	B13-0.5 <60	0.5	11/29/2010	**190**	<120	**180**	**2200**	**4000**	**3000**	**2700**	**2400**	**3100**	**900**	**2000**	<120	**2200**	<120	**780**	**2800**	**5300**
B13	B13-1.0 <60	1	11/29/2010	**17**	<5	**49**	**320**	**130**	**460**	**350**	**350**	**400**	**120**	**430**	**9.4**	**300**	**5.3**	**210**	**450**	**320**
B13	B13-1.5 <60	1.5	11/29/2010	<5	<5	<5	**9.3**	**13**	**11**	**9.8**	**9.3**	**13**	<5	**11**	<5	**8.5**	<5	<5	**14**	**18**
B14	B14-0.5 <60	0.5	11/29/2010	**1800**	<1000	**2000**	**27000**	**45000**	**48000**	**32000**	**15000**	**34000**	**8300**	**24000**	<1000	**24000**	<1000	**8200**	**32000**	**60000**
B14	B14-1.0 <60	1	11/29/2010	**29**	<5	**29**	**290**	**540**	**610**	**390**	**190**	**370**	**110**	**280**	**6.3**	**350**	<5	**100**	**330**	**730**
B14	B14-1.5 <60	1.5	11/29/2010	<5	<5	<5	**5.8**	**7.5**	**8.1**	**6**	<5	**6.6**	<5	<5	<5	**5**	<5	<5	**5.6**	**11**
B15	B15-0.5 <60	0.5	11/29/2010	<99	<99	<99	**750**	**1300**	**750**	**540**	**270**	**1400**	**150**	**330**	<99	**250**	<99	**250**	**1100**	**1600**
B15	B15-1.0 <60	1	11/29/2010	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	**ND**
B15	B15-1.5 <60	1.5	11/29/2010	**450**	<210	**340**	**3400**	**6400**	**6500**	**4400**	**2900**	**4000**	**1200**	**3400**	<210	**3800**	<210	**1100**	**3700**	**8500**
B15	B15-3.0 <60	3	11/29/2010	**780**	<250	**390**	**3600**	**7400**	**6800**	**5100**	**3100**	**4600**	**1300**	**3200**	<250	**3900**	<250	**1100**	**4300**	**9600**
C1	C1-0.5 <60	0.5	11/30/2010	**33 J**	<25	**33**	**370**	**640**	**750**	**420**	**340 J**	**510**	**130**	**410**	<25	**400**	<25	**130 J**	**480**	**880**
C1	C1-1.0 <60	1	11/30/2010	<4.9	<4.9	<4.9	**17**	**21**	**29**	**14**	**11 J**	**22**	<4.9	**20**	<4.9	**13**	<4.9	**8.1 J**	**22**	**29**
C1	C1-1.5 <60	1.5	11/30/2010	<5	<5	<5	**16**	**23**	**26**	**15**	**10 J**	**19**	<5	**16**	<5	**12**	<5	**5.7 J**	**20**	**30**
C2	C2-0.5 <60	0.5	11/30/2010	**310 J**	<230	**410**	**3500**	**5600**	**7100**	**3800**	**2400 J**	**4400**	**1100**	**4000**	<230	**3300**	<230	**1500 J**	**4700**	**7600**
C2	C2-1.0 <60	1	11/30/2010	**12 J**	<4.9	**46**	**230**	**250**	**360**	**130**	**130 J**	**260**	**48**	**330**	**8.1**	**130**	<4.9	**170 J**	**320**	**350**
C2	C2-1.5 <60	1.5	11/30/2010	<5	<5	**8.1**	**34**	**38**	**49**	**22**	**22 J**	**42**	**6.8**	**51**	<5	**20**	<5	**27 J**	**48**	**53**
C2	C2-3.0 <60	3	11/30/2010	**5 J**	<5 UJ	**6.7 J**	**64 J**	**100 J**	**120 J**	**58 J**	**40 J**	**81 J**	**16 J**	**62 J**	<5 UJ	**46 J**	<5 UJ	**21 J**	**83 J**	**130**
C3	C3-0.5 <60	0.5	11/30/2010	**800**	<490	<490	**6500**	**12000**	**9900**	**8900**	**8600**	**8600**	**2400**	**6600**	<490	**8000**	<490	**2200**	**8300**	**16000**
C3	C3-1.0 <60	1	11/30/2010	**11**	<5	**16**	**140**	**210**	**260**	**150**	**110**	**180**	**38**	**180**	<5	**130**	<5	**59**	**190**	**290**
C3	C3-1.5 <60	1.5	11/30/2010	<4.9	<4.9	<4.9	**17**	**27**	**29**	**19**	**14**	**22**	**5.2**	**18**	<4.9	**17**	<4.9	**6.4**	**23**	**37**
C4	C4-0.5 <60	0.5	11/30/2010	**1200**	<500	**1000**	**13000**	**22000**	**22000**	**14000**	**7700**	**16000**	**3800**	**11000**	<500	**11000**	<500	**3800**	**14000**	**29000**
C4	C4-1.0 <60	1	11/30/2010	**95**	<50	**77**	**930**	**1800**	**1500**	**1200**	**1100**	**1200**	**400**	**880**	<50	**1200**	<50	**310**	**1100**	**2400**
C4	C4-1.5 <60	1.5	11/30/2010	**67**	<50	**110**	**1200**	**2000**	**2200**	**1400**	**1300**	**1700**	**230**	**1500**	<50	**1400**	<50	**400**	**1600**	**2700**
C4	C4-3.0 <60	3	11/30/2010	<4.9	<4.9	<4.9	**31**	**51**	**63**	**35**	**21**	**44**	**9.9**	**34**	<4.9	**30**	<4.9	**12**	**43**	**69**

TABLE 6

SOIL ANALYTICAL DATA: PAHs [1]
Pacific Rod and Gun Club
San Francisco, California

Results reported in micrograms per kilogram (µg/kg)

Sample Location	Sample ID	Depth (ft bgs)	Date	Acenaph-thene	Acenaph-thylene	Anthra-cene	Benzo (a) Anthracene	Benzo (a) Pyrene	Benzo (b) Fluoranthene	Benzo (g,h,i) Perylene	Benzo (k) Fluoranthene	Chrysene	Dibenz (a,h) Anthracene	Fluoran-thene	Fluorene	Indeno-(1,2,3-cd)-pyrene	Naphtha-lene	Phenan-threne	Pyrene	BaPe [2]
Benzo(a)Pyrene Potency Equivalent Factor (PEF)				**NA**	**NA**	**NA**	**0.1**	**1**	**0.1**	**NA**	**0.1**	**0.01**	**0.34**	**NA**	**NA**	**0.1**	**NA**	**NA**	**NA**	**NA**
C5	C5-0.5 <60	0.5	11/30/2010	**22000**	<4000	**18000**	**180000**	**320000**	**220000**	**190000**	**230000**	**230000**	**61000**	**180000**	**4700**	**180000**	<4000	**72000**	**230000**	**420000**
C5	C5-1.0 <60	1	11/30/2010	**2400**	<500	**2200**	**22000**	**39000**	**42000**	**27000**	**17000**	**26000**	**7600**	**22000**	<500	**24000**	<500	**7300**	**24000**	**52000**
C5	C5-1.5 <60	1.5	11/30/2010	**4600**	<500	**3400**	**34000**	**67000**	**52000**	**40000**	**45000**	**43000**	**13000**	**37000**	**960**	**37000**	**590**	**13000**	**42000**	**89000**
C5	C5-3.0 <60	3	11/30/2010	**11**	<5	**9.2**	**99**	**180**	**200**	**130**	**85**	**130**	**37**	**100**	<5	**110**	<5	**32**	**130**	**240**
C6	C6-0.5 <60	0.5	11/30/2010	**6500**	<1000	**5800**	**62000**	**120000**	**89000**	**77000**	**81000**	**82000**	**26000**	**65000**	**1400**	**75000**	<1000	**23000**	**75000**	**160000**
C6	C6-1.0 <60	1	11/30/2010	**1800**	<200	**1700**	**19000**	**30000**	**23000**	**24000**	**25000**	**24000**	**7800**	**21000**	**420**	**22000**	**280**	**7000**	**23000**	**42000**
C6	C6-1.5 <60	1.5	11/30/2010	**19**	<5	**18**	**190**	**350**	**280**	**230**	**250**	**250**	**72**	**210**	<5	**220**	<5	**75**	**240**	**470**
C6	C6-3.0 <60	3	11/30/2010	**11**	<5	**11**	**120**	**200**	**250**	**130**	**79**	**150**	**37**	**130**	<5	**110**	<5	**40**	**150**	**270**
C7	C7-0.5 <60	0.5	11/30/2010	**8700**	<1000	**7200**	**73000**	**140000**	**100000**	**91000**	**100000**	**97000**	**31000**	**72000**	**2000**	**84000**	**1100**	**27000**	**90000**	**190000**
C7	C7-1.0 <60	1	11/30/2010	**780**	<250	**940**	**11000**	**20000**	**17000**	**13000**	**14000**	**13000**	**4300**	**12000**	<250	**13000**	<250	**3800**	**13000**	**27000**
C7	C7-1.5 <60	1.5	11/30/2010	**3200**	<990	**9500**	**69000**	**93000**	**140000**	**43000**	**43000**	**80000**	**15000**	**100000**	**1700**	**42000**	**1100**	**35000**	**99000**	**130000**
C7	C7-3.0 <60	3	11/30/2010	**5.2**	<5	**11**	**92**	**120**	**160**	**64**	**65**	**100**	**19**	**120**	<5	**57**	<5	**44**	**120**	**160**
C8	C8-0.5 <60	0.5	11/30/2010	**59 J**	<50	**97**	**920**	**1400**	**1200**	**900**	**1100**	**1200**	**180**	**1000**	<50	**860**	<50	**410**	**1200**	**2000**
C8	C8-1.0 <60	1	11/30/2010	**590 J**	<250	**1200**	**9400**	**14000**	**18000**	**5800**	**5700**	**11000**	**2000**	**12000**	<250	**6000**	<250	**4500**	**12000**	**19000**
C8	C8-1.5 <60	1.5	11/30/2010	**470 J**	<250	**1500**	**9700**	**12000**	**16000**	**5000**	**6800**	**11000**	**1700**	**14000**	<250	**5000**	<250	**5600**	**13000**	**16000**
C8	C8-3.0 <60	3	11/30/2010	**8.6**	<4.9	**29**	**180**	**230**	**330**	**110**	**100**	**200**	**35**	**260**	<4.9	**110**	<4.9	**110**	**260**	**320**
C9	C9-0.5 <60	0.5	11/29/2010	**5200 J**	<3000	**5500**	**75000**	**130000**	**85000**	**83000**	**79000**	**100000**	**22000**	**62000**	<3000	**68000**	<3000	**27000**	**94000**	**170000**
C9	C9-1.0 <60	1	11/29/2010	<5000	<5000	<5000	**40000**	**62000**	**45000**	**40000**	**48000**	**52000**	**6900**	**46000**	<5000	**38000**	<5000	**17000**	**52000**	**82000**
C9	C9-1.5 <60	1.5	11/29/2010	**1200 J**	<990	**3300**	**24000**	**33000**	**31000**	**21000**	**26000**	**29000**	**4800**	**32000**	<990	**21000**	<990	**12000**	**32000**	**45000**
C9	C9-3.0 <60	3	11/29/2010	**10**	<5	**15**	**160**	**250**	**290**	**160**	**100**	**200**	**47**	**180**	<5	**130**	<5	**66**	**220**	**340**
C10	C10-0.5 <60	0.5	11/29/2010	<7300	<7300	**7600**	**130000**	**220000**	**160000**	**110000**	**42000**	**190000**	**31000**	**68000**	<7300	**61000**	<7300	**41000**	**160000**	**270000**
C10	C10-1.0 <60	1	11/29/2010	**12000**	<5000	**23000**	**260000**	**390000**	**520000**	**240000**	**170000**	**300000**	**68000**	**310000**	<5000	**220000**	<5000	**83000**	**310000**	**530000**
C10	C10-1.5 <60	1.5	11/29/2010	**280**	<250	**1700**	**13000**	**15000**	**14000**	**8900**	**12000**	**14000**	**3200**	**19000**	<250	**8100**	<250	**6600**	**18000**	**21000**
C10	C10-3.0 <60	3	11/29/2010	<5	<5	<5	**13**	**15**	**19**	**9.4**	**8.2**	**14**	<5	**13**	<5	**8.8**	<5	<5	**15**	**21**
C11	C11-0.5 <60	0.5	11/29/2010	<600	<600	**670**	**10000**	**17000**	**15000**	**12000**	**11000**	**13000**	**4500**	**9900**	<600	**11000**	<600	**2700**	**12000**	**23000**
C11	C11-1.0 <60	1	11/29/2010	<100	<100	**300**	**3600**	**4700**	**4200**	**3200**	**3800**	**4100**	**1000**	**4600**	<100	**2800**	<100	**1200**	**4700**	**7000**
C11	C11-1.5 <60	1.5	11/29/2010	<5	<5	**6.3**	**120**	**210**	**220**	**190**	**150**	**150**	**60**	**110**	<5	**160**	<5	**26**	**120**	**300**
C11	C11-3.0 <60	3	11/29/2010	<4.9	<4.9	<4.9	**11**	**17**	**22**	**14**	**7.5**	**12**	<4.9	**11**	<4.9	**13**	<4.9	<4.9	**11**	**23**
C13	C13-0.5 <60	0.5	11/29/2010	<5000	<5000	<5000	**37000**	**58000**	**52000**	**38000**	**20000**	**45000**	**10000**	**27000**	<5000	**27000**	<5000	**10000**	**38000**	**75000**
C13	C13-1.0 <60	1	11/29/2010	**2200**	<1000	**2500**	**27000**	**46000**	**47000**	**32000**	**18000**	**31000**	**9400**	**25000**	<1000	**26000**	<1000	**8000**	**29000**	**61000**
C13	C13-1.5 <60	1.5	11/29/2010	**130**	<99	**150**	**2000**	**3500**	**4300**	**2500**	**1600**	**2300**	**730**	**2000**	<99	**2200**	<99	**530**	**2000**	**4800**
C13	C13-3.0 <60	3	11/29/2010	<5	<5	<5	**12**	**16**	**16**	**10**	**5.4**	**14**	<5	**9.5**	<5	**7.6**	<5	<5	**13**	**21**
C14	C14-0.5 <60	0.5	11/29/2010	**530**	< 250	**470**	**5100**	**9100**	**9700**	**6100**	**3800**	**6100**	**1600**	**4800**	< 250	**5000**	< 250	**1600**	**5400**	**12000**
C14	C14-1.0 <60	1	11/29/2010	**2200**	< 490	**2300**	**22000**	**39000**	**32000**	**25000**	**14000**	**23000**	**6600**	**18000**	**560**	**18000**	< 490	**7000**	**26000**	**50000**
C14	C14-1.5 <60	1.5	11/29/2010	**1200**	< 490	**1600**	**17000**	**32000**	**24000**	**19000**	**9300**	**21000**	**5200**	**11000**	< 490	**13000**	< 490	**5000**	**21000**	**40000**
C14	C14-2.0 <60	2	11/29/2010	**9100**	< 4900	**14000**	**150000**	**260000**	**200000**	**150000**	**76000**	**180000**	**38000**	**95000**	< 4900	**95000**	< 4900	**45000**	**180000**	**330000**
D2	D2-0.5 <60	0.5	11/30/2010	**41**	<25	**61**	**790**	**1100**	**1300**	**540**	**460**	**920**	**170**	**840**	<25	**480**	<25	**220**	**960**	**1500**
D2	D2-1.0 <60	1	11/30/2010	**5.9**	<4.9	**10**	**110**	**140**	**220**	**87**	**76**	**150**	**27**	**140**	<4.9	**80**	<4.9	**44**	**140**	**200**
D2	D2-1.5 <60	1.5	11/30/2010	<100	<100	<100	**390**	**370**	**520**	**190**	**190**	**410**	<100	**620**	<100	**160**	<100	**280**	**610**	**520**
D2	D2-3.0 <60	3	11/30/2010	**28 J**	<9.8 UJ	**41 J**	**410 J**	**610 J**	**870 J**	**310 J**	**270 J**	**510 J**	**95 J**	**520 J**	<9.8 UJ	**280 J**	<9.8 UJ	**160 J**	**550 J**	**830**
D4	D4-0.5 <60	0.5	11/30/2010	**11000**	<9900	<9900	**120000**	**210000**	**150000**	**150000**	**140000**	**160000**	**43000**	**110000**	<9900	**130000**	<9900	**37000**	**140000**	**280000**
D4	D4-1.0 <60	1	11/30/2010	**9800**	<4900	**8000**	**97000**	**180000**	**120000**	**110000**	**130000**	**120000**	**32000**	**92000**	<4900	**97000**	<4900	**31000**	**120000**	**240000**
D4	D4-1.5 <60	1.5	11/30/2010	**8000**	<2500	**7000**	**72000**	**120000**	**140000**	**84000**	**49000**	**85000**	**25000**	**71000**	<2500	**74000**	<2500	**23000**	**79000**	**160000**
D4	D4-3.0 <60	3	11/30/2010	**1400**	<250	**2200**	**25000**	**40000**	**54000**	**32000**	**16000**	**30000**	**8000**	**31000**	**470**	**28000**	**270**	**8900**	**32000**	**55000**
D5	D5-0.5 <60	0.5	11/30/2010	**36000**	<25000	**26000**	**280000**	**510000**	**350000**	**330000**	**340000**	**360000**	**97000**	**270000**	<25000	**310000**	<25000	**100000**	**360000**	**670000**
D5	D5-1.0 <60	1	11/30/2010	**84000**	<25000	**56000**	**610000**	**1200000**	**770000**	**700000**	**890000**	**760000**	**220000**	**590000**	<25000	**670000**	<25000	**210000**	**740000**	**1600000**
D5	D5-1.5 <60	1.5	11/30/2010	**170000**	<50000	**120000**	**1100000**	**2000000**	**1300000**	**1200000**	**1600000**	**1400000**	**370000**	**1200000**	<50000	**1100000**	<50000	**470000**	**1400000**	**2600000**
D5	D5-3.0 <60	3	11/30/2010	**94**	<25	**100**	**1200**	**2000**	**2400**	**1200**	**780**	**1400**	**410**	**1100**	**25**	**1200**	<25	**340**	**1300**	**2700**
D6	D6-0.5 <60	0.5	11/30/2010	**28000**	<25000	**31000**	**340000**	**540000**	**550000**	**390000**	**200000**	**410000**	**100000**	**320000**	<25000	**300000**	<25000	**100000**	**360000**	**720000**
D6	D6-1.0 <60	1	11/30/2010	<50000	<50000	**50000**	**480000**	**740000**	**820000**	**340000**	**340000**	**580000**	**100000**	**520000**	<50000	**320000**	<50000	**170000**	**550000**	**980000**
D6	D6-1.5 <60	1.5	11/30/2010	**10000**	<10000	**13000**	**130000**	**200000**	**240000**	**93000**	**90000**	**150000**	**27000**	**140000**	<10000	**91000**	<10000	**44000**	**160000**	**270000**
D6	D6-3.0 <60	3	11/30/2010	**7.7**	<5	**14**	**150**	**220**	**310**	**140**	**91**	**190**	**43**	**190**	<5	**120**	<5	**51**	**190**	**300**

TABLE 6

SOIL ANALYTICAL DATA: PAHs [1]
Pacific Rod and Gun Club
San Francisco, California

Results reported in micrograms per kilogram (µg/kg)

Sample Location	Sample ID	Depth (ft bgs)	Date	Acenaph-thene	Acenaph-thylene	Anthra-cene	Benzo (a) Anthracene	Benzo (a) Pyrene	Benzo (b) Fluoranthene	Benzo (g,h,i) Perylene	Benzo (k) Fluoranthene	Chrysene	Dibenz (a,h) Anthracene	Fluoran-thene	Fluorene	Indeno-(1,2,3-cd)-pyrene	Naphtha-lene	Phenan-threne	Pyrene	BaPe [2]
Benzo(a)Pyrene Potency Equivalent Factor (PEF)				**NA**	**NA**	**NA**	**0.1**	**1**	**0.1**	**NA**	**0.1**	**0.01**	**0.34**	**NA**	**NA**	**0.1**	**NA**	**NA**	**NA**	**NA**
D8	D8-0.5 <60	0.5	11/30/2010	<25000	<25000	<25000	**250000**	**400000**	**310000**	**260000**	**250000**	**310000**	**74000**	**250000**	<25000	**220000**	<25000	**83000**	**310000**	**530000**
D8	D8-1.0 <60	1	11/30/2010	<5000	<5000	<5000	**57000**	**91000**	**68000**	**60000**	**62000**	**71000**	**18000**	**58000**	<5000	**52000**	<5000	**19000**	**72000**	**120000**
D8	D8-1.5 <60	1.5	11/30/2010	<250	<250	**660**	**5100**	**7200**	**6400**	**4600**	**5500**	**6200**	**1400**	**6500**	<250	**4200**	<250	**2400**	**6900**	**10000**
D8	D8-3.0 <60	3	11/30/2010	<5	<5	<5	**38**	**56**	**65**	**31**	**25**	**45**	**9**	**40**	<5	**26**	<5	**13**	**47**	**75**
D9	D9-0.5 <60	0.5	11/30/2010	**17000 J**	<10000	**14000**	**160000**	**280000**	**210000**	**180000**	**180000**	**210000**	**30000**	**160000**	<10000	**160000**	<10000	**54000**	**210000**	**360000**
D9	D9-1.0 <60	1	11/30/2010	**46000 J**	<37000	**40000**	**460000**	**750000**	**520000**	**480000**	**540000**	**570000**	**140000**	**460000**	<37000	**440000**	<37000	**140000**	**570000**	**1000000**
D9	D9-1.5 <60	1.5	11/30/2010	**2800 J**	<990	**5900**	**43000**	**64000**	**55000**	**41000**	**47000**	**52000**	**8500**	**55000**	**1200**	**38000**	<990	**22000**	**57000**	**86000**
D9	D9-3.0 <60	3	11/30/2010	**8.3**	<5	**13**	**120**	**170**	**220**	**120**	**68**	**140**	**27**	**140**	<5	**98**	<5	**48**	**160**	**230**
Background Samples																				
BS-1	BS-1-0.5 <60	0.5	12/2/2010	<10	<10	<10	**11**	**17**	**20**	**16**	**10**	**18**	<10	**13**	<10	**12 J**	<10	<10	**17**	**24**
BS-1	BS-1-1.0 <60	1	12/2/2010	<29	<29	<29	<29	**34**	**35**	**30**	**37**	**37**	<29	<29	<29	<29 UJ	<29	<29	**30**	**49**
BS-2	BS-2-0.5 <60	0.5	12/2/2010	<4.9	<4.9	<4.9	**6.2**	**9.1**	**9.8**	**7.6**	**7.0**	**8.8**	<4.9	**7.5**	<4.9	**5.8 J**	<4.9	<4.9	**9.5**	**13**
BS-2	BS-2-1.0 <60	1	12/2/2010	<5	<5	<5	**8.4**	**12**	**12**	**10**	**10**	**12**	<5	**10**	<5	**7.9 J**	<5	**5**	**13**	**17**
BS-3	BS-3-0.5 <60	0.5	12/2/2010	<10	<10	<10	**16**	**21**	**21**	**25**	**15**	**22**	<10	**21**	<10	**15 J**	<10	**22**	**29**	**30**
BS-3	BS-3-1.0 <60	1	12/2/2010	<9.9	<9.9	<9.9	**23**	**33**	**29**	**30**	**26**	**31**	<9.9	**35**	<9.9	**22 J**	<9.9	**20**	**43**	**45**
BS-4	BS-4-0.5 <60	0.5	12/2/2010	<130	<130	<130	<130	**150**	**140**	<130	<130	**150**	<130	<130	<130	<130 UJ	<130	<130	**130**	**210**
BS-4	BS-4-1.0 <60	1	12/2/2010	<25	<25	<25	**77**	**130**	**110**	**91**	**100**	**110**	<25	**91**	<25	**73 J**	<25	**38**	**120**	**170**
BS-5	BS-5-0.5 <60	0.5	11/30/2010	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	<99	**ND**
BS-5	BS-5-1.0 <60	1	11/30/2010	<50	<50	<50	**81**	**130**	**130**	**94**	**150**	**110**	<50	**78**	<50	**75**	<50	<50	**98**	**180**
Summary Statistics for Pacific Rod and Gun Club Samples																				
Count				212	212	212	212	212	212	212	212	212	212	212	212	212	212	212	212	212
Number of Detects				106	0	119	179	185	186	180	179	184	153	176	18	179	8	157	184	187
Number of Non-Detects				106	212	93	33	27	26	32	33	28	59	36	194	33	204	55	28	25
Minimum Detection				5	0	5.5	5	5.2	5	5	5.2	5	5	5.1	6.1	5	5.3	5	5.2	5
Maximum Detection				170,000	0	120,000	1,100,000	2,000,000	1,300,000	1,200,000	1,600,000	1,400,000	370,000	1,200,000	4,700	1,100,000	1,100	470,000	1,400,000	2,600,000
Minimum Reporting Limit				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	4.9	4.9	--
Maximum Reporting Limit				50,000	50,000	25,000	25	25	25	25	25	25	250	25	50,000	25	50,000	250	25	--
Detection Frequency				50%	0%	56%	84%	87%	88%	85%	84%	87%	72%	83%	8%	84%	4%	74%	87%	88%
Screening Criteria																				
Maximum Background Concentration				ND	ND	ND	81	150	140	94.0	150	150	ND	91	ND	75	ND	38	130	210
Minimum Background Concentration				ND	ND	ND	6.2	9.1	9.8	7.6	7.0	8.8	ND	7.5	ND	5.8	ND	5.0	9.5	13
Residential Direct Exposure ESL [3]				500,000	340,000	3,100,000	380	38	380	340,000	380	62,000	62	460,000	390,000	620	1,300	11,000	690,000	38
Commercial/Industrial Direct Exposure ESL [3]				3,100,000	3,300,000	26,000,000	1,300	130	1,300	3,300,000	1,300	210,000	210	4,400,000	2,800,000	2,100	2,800	3,300,000	6,600,000	130

Notes
1. Soil samples collected by AMEC Geomatrix, Inc., and analyzed for polycyclic aromatic hydrocarbons (PAHs) using U.S. EPA Method 8270C SIM.
2. The benzo(a)pyrene equivalent (BaPe) is calculated as the summation of the potency equivalency factors (PEFs) multiplied by the concentrations of the carcinogenic PAHs. One-half the reporting limit is used when other analytes are detected.
3. Environmental Screening Level (ESL), Regional Water Quality Control Board, San Francisco Bay Region, 2008, Update to Environmental Screening Levels for Sites with Impacted Soil and Groundwater, May. (Target hazard quatient for noncarcinogenic endpoints equals 0.2.)

Abbreviations
Bolded = values detected above the analytical reporting limit
-- = not applicable
< = Constituent was not detected above indicated reporting limit.
π bgs = feet below ground surface
J = The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
ND = not detected
UJ = The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.