

THRIFTY OIL CO.

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Alameda County
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July 18, 2007

O.78403

Mr. Steven Plunkett
Alameda County Health Care Services
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

Local #RO0000004
RWQCB #01-1478

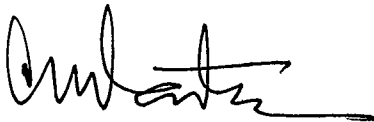
RE: **Former Thrifty Oil Co. Station #049**
3400 San Pablo Avenue
Oakland, CA 94612
Revised Workplan for Additional Off-Site Assessment

Dear Mr. Plunkett:

Presented herein is the Revised Workplan for Additional Off-Site Assessment (Revised Workplan), dated July 18, 2007, and prepared by Equipoise Corporation for former Thrifty Oil Co. (Thrifty) Station #049 located at 3400 San Pablo Avenue, Oakland, California (**Figure 1**). The Revised Workplan was completed in response to Alameda County Health Care Services (ACHCS) letter dated May 18 2007, which requested revisions to the Site Conceptual Model (SCM) prepared in May 2006 and the Workplan for Additional Offsite Assessment prepared in May 2004 by GeoHydrologic Consultants on behalf of Thrifty. The Revised Workplan also responds to ACHCS concerns regarding the completion of a preferential pathway study.

Should you have any questions regarding this report, please contact Rick Blackmer of Equipoise Corporation at (949) 366-0275 or the undersigned at (562) 921-3581, Ext. 390.

Respectfully submitted,



Chris Panaitescu
General Manager
Environmental Affairs

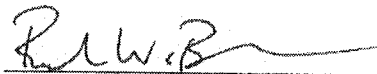
cc: BP West Coast Products LLC; Mr. Bobby Lu, P.G.
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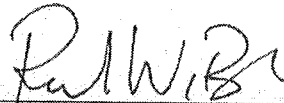
**Revised Workplan
Additional Off-Site Assessment
Thrifty Oil Co. Station No. 049
ARCO Products Company Station #9535
3400 San Pablo Avenue
Oakland, California**

Fuel Leak Case No. RO00000004
Facility Global ID No. T0600101365

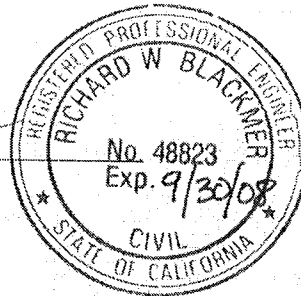
Prepared for
Thrifty Oil Co.
13116 Imperial Highway
Santa Fe Springs, California 90670
Equipoise Project No. CA135.049.T6.



For Elliot Haro
Project Scientist



Richard W. Blackmer, P.E.
Principal Engineer



July 18, 2007

EQUIPOISE
CORPORATION

1401 N. El Camino Real, Suite 107

San Clemente, California 92672

Phone (949) 366-0266

Fax (949) 366-0281

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1.0 INTRODUCTION

Equipoise Corporation (EQC), on behalf of Thrifty Oil Co. (Thrifty), is pleased to submit this Revised Workplan for Additional Off-Site Assessment (Workplan) to assess (1) potential impacts to off-site subsurface soils and groundwater and (2) potential for contamination migrating onsite from an offsite, upgradient source at former Thrifty Station #049 located at 3400 San Pablo Avenue in Oakland, California (Site). The site location map is presented on **Figure 1** and the Site Plan is presented on **Figure 2**. This Workplan was prepared in response to the May 18, 2007 letter sent to Thrifty from Alameda County Environmental Health (ACEH; also referred to as Alameda County Health Care Services [ACHCS]) and includes response to ACEH technical comments and the proposed scope of work. A description of the proposed assessment methods is provided in the subsequent sections of this Workplan.

2.0 BACKGROUND

2.1 PREVIOUS SITE ASSESSMENT ACTIVITIES

A summary of previous site assessment activities is provided below and the historic and recent soil sample analytical results are presented in **Appendix A** which is taken from Site Conceptual Model and Plume Travel Time Report, Thrifty Oil Co. Station 049, 3400 San Pablo Avenue, Oakland, California, May 3, 2006 prepared by Geo Hydrologic Consultants, Inc. (GHC):

- July 1986: Groundwater Technology, Inc. (GTI) performed the initial soil and groundwater assessment activities at the Site that included advancing three soil borings (SB-1 through SB-3) and installation of three 2-inch diameter PVC monitoring wells (MW-1 through MW-3). Six soil samples were collected during this soil assessment (one soil sample per borehole/ monitoring well location) and only two samples, SB-2 at 9.0 feet below ground surface (bgs) and MW-3 at 4.0 feet bgs exceeded laboratory detection limits for total petroleum hydrocarbon as gasoline (TPHg) at concentrations of 67 and 22 milligrams per kilogram (mg/kg), respectively. These concentrations were below the Regional Water Quality Control Board (RWQCB)'s environmental screening level (ESL) for in shallow soil.
- November 1986: Woodward-Clyde Consultants performed additional soil and groundwater assessment activities at the Site that included installation of two 2-inch diameter PVC monitoring wells (MW-5 and MW-6) and two 4-inch diameter PVC monitoring wells (MW-4 and MW-7) to 15 feet below ground surface (bgs). Soil samples were collected at the approximate location of the water table at a depth between 6 and 7 feet bgs in all of the borings except for MW-5 where a sample could not be recovered. The soil samples collected from MW-4 and MW-7 exhibited hydrocarbon odors and were submitted for chemical analysis. The soil sample from MW-4 was found to have detectable levels of total petroleum hydrocarbons (TPH) of 1,200 mg/kg, which is above the ESL of 100 mg/kg, and a benzene concentration of 12 mg/kg, which exceeded ESL (0.044 mg/kg).
- September 1987: Interstate Soils Sampling under the supervision of an engineering geologist from Hydrotech completed soil borings B-1 through B-5 to total a depth of 16 feet (except for B-4 which was completed to 4 feet). Field photoionization detector (PID) readings were used to determine soil samples to be submitted for laboratory analysis for TPHg. Laboratory analysis was performed on one soil samples from borings B-2 and B-3 and the sample collected from B-2 at 5 feet bgs had a concentration of 3,600 mg/kg. The sample collected from an unspecified depth for B-3 was below the detection limit.
- March 1998: Four gasoline underground storage tanks (USTs) and their associated piping were removed from the Site. The USTs were 10,000-gallon and 8,000-gallon capacity and were constructed of single-walled steel. On March 27, 1998, two 20,000-gallon double-walled USTs were installed at the Site. Approximately 1,093 tons of impacted soil was excavated. Soil samples and groundwater samples were collected and analyzed. Areas of significant petroleum hydrocarbon impact were the former UST basin and the product piping trenches. TPH concentrations were detected between 9.5 mg/kg in soil

sample P-5 to 3,900 mg/kg in soil sample P-4. Benzene concentrations were detected between 0.15 mg/kg in soil sample P-5 to 19 mg/kg in soil sample P-4.

- January 2004: Advance GeoEnvironmental (AGE) completed four offsite soil borings (B-1 through B-4) to a total depth of 20 feet bgs. TPHg was detected in the soil sample collected from B-2 at the five foot interval at a concentration of 654 mg/kg and in B-4 at the five foot interval at 30 mg/kg. The remaining 13 samples collected by AGE were below laboratory detection limits.
- March 2004: On March 11, 2004, Thrifty submitted soil and groundwater data from the four offsite soil borings (B-1 through B-4) and onsite well replacement activities performed by AGE. TPHg concentrations were detected in samples B2-5 (654 mg/kg) and B4-5 (30 mg/kg). Benzene concentrations detected ranged from 0.0018J mg/kg in B1-5 to 0.016 mg/kg in B1-10, and methyl tert butyl ether (MTBE) concentrations ranged from 0.0055 mg/kg in B2-20 to 1.32 mg/kg in B3-15. The ESLs for TPHg, benzene, and MTBE in soil are 100 mg/kg, 0.044 mg/kg, and 0.023 mg/kg, respectively.

In a letter dated March 19, 2004, the ACHCA requested that Thrifty prepare a workplan to address the offsite contamination detected during the January 2004 site assessment conducted by AGE. After further discussing the scope of work with the ACHCA in an e-mail dated April 27, 2004, Thrifty submitted a workplan to install one onsite (MW-10) and two offsite wells (MW-8 and MW-9) downgradient of the Site (**Figure 2**). The ACHCA responded in an e-mail dated May 4, 2004, requesting additional borings to delineate the plume to the west and southwest of the Site. Thrifty submitted a revised Workplan for Additional Offsite Assessment dated May 7, 2004 that included two additional borings (SB-5 and SB-6) to the southwest of the Site (**Figure 2**). In a letter dated May 17, 2004, the ACHCA approved the May 7, 2004 workplan with the request that additional borings be considered if soil and groundwater samples indicate significant hydrocarbon contamination. Thrifty selected GHC to conduct site assessment activities and GHC obtained well permits and was working to obtain an encroachment permit from the City of Oakland Public Works Department (COPWD). The encroachment permit is still being reviewed by the COPWD following comments by Thrifty.

2.2 PREVIOUS REMEDIAL ACTIVITIES

Site remedial activities were initiated in April 1991. The remediation system consists of a groundwater treatment system using activated carbon, with groundwater extraction from well RW-1. On April 4, 2003, the system was shut off for upgrade activities. As of April 4, 2003, the system treated approximately 1,445,088 gallons of groundwater since startup.

Thrifty selected AGE to conduct remedial system upgrade activities including installation of a new treatment compound, installation of new piping, connection of piping to the replacement well network, and the operation and maintenance of the upgraded groundwater pump and treat system. In January 2004, AGE abandoned wells MW-2, MW-4, and RW-1 and replaced them with wells MW-2R, MW-4R, and RW-1R.

The upgraded remediation system was restarted by AGE for continuous operation on June 21, 2004. The primary components of the upgraded system within the treatment compound consist of an air compressor, 500 gallon Poly settling tank, control panel, and three 200 pound granular activated carbon canisters. The upgraded system is removing groundwater from extraction wells MW-2R, MW-4R, and RW-1R that are each equipped with downhole submersible pumps.

On January 12, 2005, system operations and maintenance duties were assumed by Earth Management Company (EMC) from AGE. As of June 1, 2007, the upgraded system produced and treated a cumulative system total of 1,630,736 gallons.

2.3 RECENT GROUNDWATER MONITORING AND SAMPLING RESULTS

The following section summarizes quarterly groundwater monitoring and sampling results from the Second Quarter 2007, Quarterly Status Report, Former Thrifty Oil Station #049, dated July 6, 2007 prepared by EQC.

Groundwater monitoring well locations for former Thrifty Station #049 and the former Shell Station at 3420 San Pablo Avenue are presented on **Figure 2**. Depth to groundwater is measured in each monitoring well on a quarterly basis. A groundwater elevation contour map based on the April 18, 2007 monitoring data is presented in **Figure 3**. Groundwater elevation data indicates that groundwater flows to the southwest under an approximate gradient of 0.051 feet/foot.

As part of the ongoing groundwater-monitoring program, EMC obtained groundwater samples from monitoring wells MW-1, MW-2R, MW-3, MW-4R, MW-5, MW-6, MW-7, and RW-1R on April 18, 2007. Groundwater samples were delivered by EMC in a chilled state following strict Chain-of-Custody procedures to a state-certified laboratory and analyzed for TPHg by EPA Method 8015B. Volatile organic compounds of benzene, toluene, ethylbenzene, and xylene (BTEX), MTBE, and other oxygenates were analyzed by EPA Method 8260B. A summary of historical analytical sampling results for TPHg, BTEX, and MTBE is provided in **Table 1** and additional oxygenates in **Table 2**.

Groundwater monitoring and sampling was conducted in coordination with sampling activities at the former Shell Service Station at 3420 San Pablo Avenue on April 18, 2007. Shell has 10 groundwater monitoring wells on its site and during the second quarter monitoring and sampling event gauged 7 of those wells (MW-1, MW-3R, MW-4, MW-5, MW-6R, MW-7, and MW-9) and sampled 6 of the 10 wells (MW-1, MW-4, MW-5, MW-6R, MW-7, and MW-9).

TPHg, benzene, and MTBE isoconcentration maps in $\mu\text{g/L}$ were prepared using data from the April 18, 2007 sampling events at both sites and results are presented in **Figures 4, 5, and 6**, respectively. Laboratory results of Thrifty wells indicate the maximum concentrations of TPHg were detected in MW-4R and RW-1R at 13,000 $\mu\text{g/L}$ in each well. The maximum concentrations of benzene and MTBE detected in Thrifty wells were from MW-4R at 52 $\mu\text{g/L}$ and 102 $\mu\text{g/L}$, respectively. Laboratory results of the Shell service station wells indicate the maximum concentration of TPHg was detected in MW-6R at 30,000 $\mu\text{g/L}$. The maximum concentrations of benzene and MTBE in Shell service station wells were detected at 2,100 $\mu\text{g/L}$ (in MW-2) and 180 $\mu\text{g/L}$ (in MW-6R), respectively.

TPHg concentrations decreased in Thrifty wells MW-2R, MW-4R, and MW-RW-1R (896 µg/L, 13,000 µg/L, and 13,000 µg/L, respectively). TPHg was not detected in Thrifty wells MW-1, MW-3, MW-5, and MW-7 during the April 18, 2007 sampling event. Benzene concentrations decreased in Thrifty well MW-4R (52 µg/L). Benzene was not detected above method detection limits in Thrifty wells MW-1, MW-2R, MW-3, MW-5, and MW-7. MTBE decreased in Thrifty wells MW-1 (7.1 µg/L), MW-2R (49 µg/L), MW-3 (11 µg/L), and RW-1R (92 µg/L). MTBE was not detected above method detection limits in Thrifty wells MW-5, MW-6, and MW-7.

2.4 RECENT PROPOSED ACTIVITIES STATUS

In a transmittal letter dated March 11, 2004, Thrifty submitted preliminary soil and groundwater data from the four offsite soil borings and onsite well replacement activities performed by AGE. On March 18, 2004, Thrifty, AGE, and the ACHCS met at the site to discuss the location of offsite well MW-8 and the soil and groundwater data provided by Thrifty. In a letter dated March 19, 2004, the ACHCS requested that Thrifty prepare a workplan to address the offsite contamination detected during the January 2004 site assessment conducted by AGE. After further discussing the scope of work with the ACHCS in an e-mail dated April 27, 2004, Thrifty submitted a workplan to install one onsite and two offsite wells downgradient of the site. The ACHCS responded in an e-mail dated May 4, 2004, requesting additional borings to delineate the plume to the west and southwest of the site. Thrifty submitted a revised Workplan for Additional Offsite Assessment dated May 7, 2004 that included two additional borings to the southwest of the site.

In a letter dated May 17, 2004, the ACHCS approved the May 7, 2004, workplan with the request that additional borings be considered if soil and groundwater samples indicate significant hydrocarbon contamination. The ACHCS also suggested moving the location of onsite well MW-10 slightly to the west to be more downgradient of the former Shell Station at 3400 San Pablo Avenue. Thrifty previously selected GHC to conduct site assessment activities. Thrifty has not been able to obtain an encroachment permit or access agreements from the City of Oakland Public Works Department.

On May 18, 2007, ACHCS sent a letter to Thrifty with technical comments regarding: the dissolved hydrocarbon plume characterization; proposed soil boring installation and soil sampling; well installation and development; preferential pathway study; soil and groundwater chemical analysis; and site conceptual model development. ACHCS has requested the preparation of a Revised Workplan for Soil and Groundwater Investigation with Revised Site Conceptual Model and Updated Preferential Pathway Study and a Soil and Groundwater Investigation Report.

3.0 RESPONSE TO ACEH TECHNICAL COMMENTS

The following section presents the Technical Comments section presented in the May 18, 2007 ACEH letter and Thrifty's response to the technical comments (in **bold font**) provided below each item number in *italic* font style.

1. **Dissolved Hydrocarbon Plume Characterization.**

The lateral extent of groundwater contamination off site has not been fully defined. Dissolved hydrocarbon contamination migration appears to be consistent with the projected groundwater gradient, toward the west/southwest. Additional soil and groundwater samples collected as part of the January 2004 investigation confirm that very high concentrations of up to 172,000 µg/L, 2,490 µg/L and 27,900 µg/L of TPHg, benzene and MtBE exits on the southwestern property boundary. These conclusions confirm that further off site investigation is needed to define the extent of dissolved hydrocarbon contamination down gradient of the site.

ACEH suggests one additional soil boring be installed midway between proposed soil borings SB-5 and SB-6 to supplement groundwater data collected from these borings. In addition, ACEH recommends that one of the proposed soil borings (SB-5 or SB-6) along the west side of San Pablo Avenue should be converted into a monitoring well to evaluate potential dissolved petroleum hydrocarbon plume migration down-gradient of the site. Furthermore, the linear distance between soil boring B-2 and the proposed soil borings on the west side of San Pablo Avenue is at least 60 feet; therefore ACEH recommends the installation of one additional soil down-gradient of B-2 and south of the median strip in San Pablo Avenue. Lastly, the proposed location of monitoring well MW-8 should be moved to the southeast corner of 34th Street in an attempt to determine if dissolved phase hydrocarbon contamination detected from soil boring B-3 is migrating off site.

The Work Plan requested below is to include plans to characterize petroleum hydrocarbon contamination in groundwater within the shallow groundwater zone and possible deeper water-bearing zones. Please consider the use of depth discrete groundwater samples collected to characterize off site conditions prior to installation of monitoring wells. We request that you use detailed hydrogeologic cross sections to determine the appropriate location and design for monitoring wells that are needed to appropriately characterize the three-dimensional extent of soil and groundwater contamination down gradient of the site. To appropriately evaluate your site, the monitoring wells will need to be screened in the permeable zones with screen lengths that match the stratigraphic sequence. Please include the above requested information in the Revised Work Plan requested below.

Thrifty proposes to complete seven soil borings; converting four of the soil borings into groundwater monitoring wells (one on-site and three off-site) to address the comments presented in the May 18, 2007 ACEH letter. The objective of the proposed assessment is to acquire additional information regarding off-site dissolved hydrocarbon plume characterization, and to investigate the potential for contamination from an off-site, up-gradient source impacting subsurface conditions at the Site.

2. Proposed Soil Boring Installation and Soil Sampling.

Thrifty suggests that soil sampling be completed to a maximum depth of 20 feet bgs., with soil samples collected at 5 foot intervals. It is important to determine the depth at which soil is not impacted by petroleum hydrocarbon contamination, and thus demonstrate the vertical profile of soil contamination. ACEH requests that soil samples be submitted for laboratory analyses at all depth intervals where staining, odor, changes in lithology, elevated PID readings are observed and at the capillary fringe. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the contamination within this interval. Please present the result of the investigation in SWI report requested below.

Thrifty is recommending that soil samples will be checked for discoloration, odors, and monitored for volatile organic compounds (VOCs) using a PID calibrated to 100 ppm hexane. During drilling activities, soil samples will be obtained at 2-foot depth intervals starting at 4 feet below ground surface (bgs) and ending between 14 and 20 feet bgs and at locations of significant soil staining, odors, or changes in lithology, and at the capillary fringe with the maximum number of samples collected for chemical analysis per boring not to exceed six.

3. Well Installation and Development.

Thrifty Oil has proposed the installation of three monitoring wells with screen intervals from 3 to 18 feet bgs. Please explain the rationale to define the vertical extent of groundwater contamination and to assess, based on site-specific conditions, whether the long screen wells provide accurate groundwater monitoring results, which may not be consistent with the collection of depth discrete groundwater samples due to various conditions that can occur within the well bore. ACEH suggests the use of monitoring wells designed with sand pack intervals of 2-5' or less, as these wells will likely be representative of depth discrete groundwater conditions. Please include well designs in the Revised Work Plan requested below.

EQC reviewed historic groundwater depth to water data for the current and former on-site wells MW-1, MW-2, MW-2R, MW-3, MW-4, MW-4R, MW-5, MW-6, MW-7, RW-1 and RW-1R collected between 1986 and 2006 (EQC, 2007). Review of the data shows a moderate water level fluctuation over the time period, with a minimum fluctuation of 2.9 feet at monitoring well RW-1R and a maximum fluctuation of 13.7 feet at monitoring well MW-3. Additionally, geologic cross sections as presented in the Site Conceptual Model and Plume Travel Time Report dated May 3, 2006 and prepared by GHC were reviewed in the process of preparing this Workplan. According to the cross sections (presented in Appendix A), static groundwater level occurs in silty clay, clayey silt, sandy clay or clay with fine grained sediments extending to the total depth depicted with the exception of interbedded gravelly silty clay, gravelly silt, or gravelly clay. The cross section locations are identified on Figure 2.

Based on this information, EQC does not recommend depth discrete screen intervals or wells because there may be substantial periods when either the entire well screen is submerged or the wells are dry based on annual rainfall. In addition, based on the moderate change in depth to water at the Site, EQC anticipates that the screen lengths will be 10 feet (intervals between 4 and 14 feet bgs). Actual screen lengths and screen interval will be based on results of soil samples tested using the mobile laboratory.

4. Preferential Pathway Study

The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as vertical conduits to deeper water bearing zones, pumping wells in the vicinity of your site, and manmade conduits for shallow migration.

Please update your study completed in October 2003, and discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey) and report your results in the Revised Preferential Pathway Study requested below. Include an evaluation of the probability of the dissolved phase and NAPL plumes for all constituents of concern encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper drinking water aquifers. The results of your study shall contain all information required by 23 CCR, Section 2654(b).

a) Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume area(s) is required as part of your study.

b) Well Survey

The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic protection wells) within a 1-mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as pathways for migration of contamination at and/or from your site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Submittal of map(s) showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Include appropriate photographic prints, in stereo pairs, of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits (see Attachment 2) when conducting your preferential pathway study.

The preferential pathway study will include an updated utility survey and an updated well survey of nearby production wells. Please note that access to information on various types of production well locations is restricted to the general public for security reasons. Thrifty will require the assistance of ACEH personnel to access the data from the appropriate information sources. In our experience, acquisition of this data can be a lengthy process and may impact the report deliverable date.

5. Soil and Groundwater Chemical Analysis.

ACEH requests that all soil and groundwater samples collected be analyzed for the following constituents; TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please include results from the investigation in the SWI report requested below.

Thrifty is recommending that select soil samples will be submitted to a mobile laboratory to evaluate the depth of contamination, to select which borings will be converted into monitoring wells, and determine appropriate screen intervals. All soil and groundwater samples will be analyzed for TPHg and total petroleum hydrocarbons as diesel (TPHd) by EPA Method 8015B, and for BTEX, MTBE, EDB, EDC and other oxygenates (DIPE, ETBE, TAME, TBA, and ethanol) by EPA Method 8260B. Soil samples will be collected in 6-inch brass sleeves or an equivalent. The remaining samples will be recorded on a standard chain-of-custody form and placed into a pre-chilled cooler with blue ice for transport to a California State-certified analytical laboratory.

6. Project Approach and Investigation Reporting — Site Conceptual Model.

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and down gradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be “validated.” The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API’s Publication No. 4699 and EPA’s Publication No. EPA 510-B-97-001 both referenced above; and “Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C,” prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project would incorporate, but not be limited to, the following:

a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.

b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down gradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:

1. Subsurface geologic features, depth to groundwater and man-made conduits.
2. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
3. Soil descriptions for all borings and wells along the line of section.
4. Screen and filter pack intervals for each monitoring well.
5. Sampling locations and results for soil and grab groundwater samples.
6. Site features such as the tank pit, dispensers, buildings, etc. Where appropriate, monitoring well locations and soil boring locations should be projected back to the strike of the cross section line.

c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.

d) Proposed activities to investigate and fill data gaps identified above.

e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.

f) Temporal changes in the plume location and concentrations are also a key

element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.

g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Thrifty's response to this item is as follows:

a: The Updated Site Conceptual Model (SCM) will include a narrative discussion of the regional geologic and hydrogeologic setting.

b: The Updated SCM will include a discussion of the local geology and hydrogeology, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down gradient and above-ground receptors. The Updated SCM report will include, at a minimum, one cross section parallel and one cross section perpendicular to the contaminant plume axis.

c: The Updated SCM will identify specific data gaps that require further investigation.

d: The Updated SCM will propose activities to investigate and fill data gaps.

e: The Updated SCM will include an analysis of the hydraulic flow system at and downgradient from the site and it will include rose diagrams for groundwater gradients.

f: The Updated SCM will include, at a minimum, isoconcentration maps for TPHg, benzene, and MTBE in groundwater and distribution of TPHg, benzene, and MTBE in soil pre-remediation and post-remediation.

g: The Updated SCM will include a summary of work and technical findings from nearby former Shell Service station at 3400 San Pablo Avenue.

4.0 SCOPE OF WORK

Thrifty proposes to complete seven soil borings; converting four of the soil borings into groundwater monitoring wells (one on-site and three off-site) to address the conditions presented in the May 18, 2007 ACEH letter.

The locations of the proposed soil borings/monitoring well are shown on **Figure 2**. Soil borings SB-5, SB-6, and SB-7 and monitoring wells MW-8, MW-9, and MW-11 will be used to assess off-site subsurface soil and groundwater conditions. Monitoring well MW-10 will be used to investigate the potential for contamination migrating on-site from an off-site, up-gradient source. Note: The borings that will be converted into monitoring wells may be modified in the field based on soil results from the mobile laboratory.

The Preferential Pathway Study (including the utility and production well survey) previously submitted in October 2003 will be also updated.

4.1 SUBSURFACE INVESTIGATION ACTIVITIES

The proposed scope of work for the subsurface investigation activities at the Site is described below.

Pre-drilling Activities: Prior to beginning field activities, EQC will select appropriate field equipment, schedule subcontractors, and conduct a geophysical survey to clear the area of utilities. The following steps will be taken to avoid encountering subsurface utilities and substructures:

1. Underground Service Alert (USA) will be notified at least 48 hours prior to drilling to mark known substructure locations and utilities.
2. At locations where numerous utilities exist nearby, the upper 4 to 5 feet of the subsurface will be cleared using hand augering methods or equivalent. A geophysical survey will be used to aid in clearing the site for underground utilities.
3. The drilling equipment will be operated slowly and carefully in the upper 10 feet bgs. Encountering of any obstruction will be cause to stop and/or probe further with a hand auger before continuing. If necessary, the sampling rig will be moved laterally 2 to 5 feet to an alternatively cleared location.

Monitoring well permits from ACEH will be obtained. Prior to starting field activities, EQC will update the existing site specific Health and Safety Plan (HASP). Upon approval of this Workplan, EQC will continue with access agreement negotiations with the COPWD to obtain the necessary encroachment permits.

Drilling Activities: After the boring locations are cleared for the presence of underground utilities, drilling and well installations will be conducted using hollow-stem auger drilling method. A drill rig equipped with a nominal 8-inch diameter auger will be used to complete the bore holes to a total anticipated depth of 20 feet below grade. However, if elevated PID readings are recorded at 20 feet below grade, then the boring will be completed to the lower extent of obviously impacted soil or to auger refusal, whichever is shallower. A geologist will be on site to monitor activities and provide hydrogeologic and logistical supervision. The geologist will record field activities in a bound notebook with numbered pages or on standard field daily logs. Boring logs will be completed on appropriate boring log forms.

Soil Sampling: Soil samples will be collected with a split-barrel sampler and be visually classified using the Unified Soil Classification System (USCS) on standard boring log forms. Soil samples will be checked for discoloration, odors, and monitored for VOCs using a PID calibrated to 100 ppm hexane. During drilling activities, soil samples will be obtained at 2-foot depth intervals starting at 4 feet bgs and ending between 14 and 20 feet bgs and at locations of significant soil staining, odors, or changes in lithology and at the capillary fringe with the maximum number of samples collected for chemical analysis per boring not to exceed six. The number of blows required to drive the sampler each 6-inch interval will be recorded and used as a qualitative measure of soil density.

Select samples will be submitted to a mobile laboratory to evaluate the depth of contamination and to select which borings will be converted into monitoring wells and determine appropriate screen intervals. All soil samples will be analyzed for TPHg and TPHd by EPA Method 8015B, and for BTEX, MTBE, EDB, EDC and other oxygenates (DIPE, ETBE, TAME, TBA, and ethanol) by EPA Method 8260B. The remaining samples will be recorded on a standard chain-of-custody form and placed into a pre-chilled cooler with blue ice for transport to a California State-certified analytical laboratory (Associated Laboratories, Inc. in Orange, California [Associated]).

Monitoring Well Construction: Wells will be constructed using 2-inch schedule 40 PVC flush-threaded casing with 0.01-inch slotted screen. Based on existing data, it is anticipated that the screened section will extend from approximately 4 to 14 feet bgs (depth to groundwater has averaged between 5 and 6 feet below top of casing at the Site, with the exception of former well RW-1 which was reinstalled (RW-1R) and is used as an extraction well for the groundwater pump and treat system). The base of the screened section will be sealed with a PVC flush-threaded bottom cap and the top of the casing will be covered with a locking well cap. A 12-inch traffic-rated well box will be set in concrete and completed in a manner to prevent accumulation of surface water on or near the well box lid. Because the borings may be completed to depths greater than the bottom of the well, the bottom of the borings will be backfilled with hydrated bentonite to within 2 feet of the bottom of the well screen interval.

The annulus around the well screen interval will be filled with #2/12 sand filter pack from the base of the silt trap to approximately 1 foot above the screen. The well will be

surged and/or swabbed before the seal is installed. A 1.5-foot-thick hydrated bentonite pellet seal will be placed above the filter pack. The height of the filter pack and bentonite seal will be periodically measured during well installation by using a weighted tape. Concrete will be used to set the traffic-rated well box from 1.5 feet bgs to the surface. **Figure 7** shows the well construction details.

Monitoring Well Development: Well development is required to enhance groundwater flow into the well and to provide representative groundwater samples. Grout will be allowed to cure at least 48 hours prior to initiating development procedures. Development consists of flushing water through the well screen, the well filter pack, and the formation so that sediment is removed. Water will be flushed out of and into the well casing by moving a surge block and/or swab up and down within the water column in the well. The surging/flushing dislodges fine sediment and pulls water and sediment around the well casing and into the well. Well development will continue until the produced well water turbidity does not exceed 20 nephelometric turbidity units (NTU) and/or the chemical parameters of pH and electrical conductivity have stabilized. Groundwater temperature, pH, and electrical conductivity will be measured and recorded at regular intervals during development. Development will continue until evacuated groundwater is relatively clear and free of sand and silt.

A submersible pump also may be used to purge additional water to achieve the appropriate turbidity. All purged groundwater generated stored in labeled Department of Transportation (DOT) approved 55-gallon drums. All development tools will be decontaminated prior to and after use.

Groundwater Sampling: Sampling groundwater from the wells will be performed at least 72 hours after well development. Prior to sampling, the wells will be purged with a bailer or submersible pump until approximately 3 to 4 well volumes of water are removed or (in the case of low yielding wells) the well has been purged dry twice. Wells are monitored after development and prior to purging for the potential presence of free product using an electric interface probe and/or a transparent sampling bailer.

Water samples will be obtained using a disposable Teflon or stainless steel bailer. Samples will be transferred to the appropriate laboratory-supplied sample bottles in a manner to minimize potential sample aeration. The sample bottles will then be sealed, labeled, and immediately placed into a cooled ice chest for transport to Associated. Samples will be recorded on a standard chain-of-custody form to document sample identification and handling. Observations during groundwater well monitoring, and groundwater sampling will be recorded on standard forms.

Samples will be analyzed for TPHg and TPHd by EPA Method 8015B, and for BTEX, MTBE, EDB, EDC and other oxygenates (DIPE, ETBE, TAME, TBA, and ethanol) by EPA Method 8260B.

Waste Disposal: All soil cuttings, decontamination water, and water produced during well development and purging will be stored in DOT approved 55-gallon steel drums, which will be sealed and labeled with the borehole number and accumulation date. The drums will be placed onsite out of traffic areas pending laboratory results. Upon receipt of the laboratory results, waste profiling and disposal will be conducted by Thrifty in accordance with applicable regulations.

4.2 PREFERENTIAL PATHWAY EVALUATION ACTIVITIES

The existing utility survey will be updated to include an evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area. The site plan and cross-sections will be updated to show the location and depth of all utility lines and trenches within and near the site and plume area.

The preferential pathway study shall include a detailed well survey of wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic protection wells) within a 1-mile radius of the subject site.

4.3 REPORTING

A technical report will be prepared describing the subsurface investigation activities. The report will include boring and well construction logs, cross sections, data analysis, laboratory analytical results, and conclusions and recommendations.

In addition, an Updated SCM will be prepared which will include a summary of the site assessment recent activities. A revised Preferential Pathway Study which will include information from utility and well survey data will also be prepared.

5.0 SCHEDULE

Thrifty and EQC anticipate starting the field activities portion of this Workplan immediately after Workplan approval by the ACEH and acquisition of an off-site access agreement with the COPWD.

All hydrogeologic and geologic information, conclusions, and recommendations in this document have been prepared under the supervision of and reviewed by a California Registered Civil Engineer or Professional Geologist.

**SUMMARY TABLE
CURRENT PERIOD GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA, 94612
T0600101365**

WELL	STATUS	Monit/ Sampl. Date	ANALYTICAL PARAMETERS										MONITORING PARAMETERS				ELEVATION	
			TPHg (ug/L)	B (ug/L)	T (ug/L)	E (ug/L)	X (ug/L)	MTBE (ug/L)	DIPE (ug/L)	ETBE (ug/L)	TAME (ug/L)	TBA (ug/L)	DTP (feet)	DTW (feet)	DTB (feet)	PT (feet)	CASING (feet)	GW (feet)
MW-1	ACT	04/18/07	<5.6	<0.32	<0.10	<0.24	<0.3	7.1	<0.29	<0.17	<0.28	<10	NP	5.46	17.72	0.00	31.55	26.09
MW-2R	ACT	04/18/07	896	<0.32	<0.10	<0.24	117	49	<0.29	<0.17	5.2	122	NP	7.60	16.78	0.00	30.49	22.89
MW-3	ACT	04/18/07	<5.6	<0.32	2.0 J	<0.24	6.2	11	<0.29	<0.17	<0.28	18	NP	5.74	24.14	0.00	31.15	25.41
MW-4R	ACT	04/18/07	13,000	52	2,300	97 J	5,140	102	<14.5	<8.5	<14	<500	NP	7.02	19.64	0.00	30.23	23.21
MW-5	ACT	04/18/07	<5.6	<0.32	<0.10	<0.24	<0.3	<0.63	<0.29	<0.17	<0.28	<10	NP	6.09	13.75	0.00	32.30	26.21
MW-6	ACT	04/18/07	2,110	29	357	37	914	<0.63	<0.29	<0.17	<0.28	<10	NP	5.40	13.06	0.00	33.14	27.74
MW-7	ACT	04/18/07	<5.6	<0.32	<0.10	<0.24	<0.3	<0.63	<0.29	<0.17	<0.28	<10	NP	5.86	13.52	0.00	31.61	25.75
RW-1R	ACT	04/18/07	13,000	<16	2,230	121 J	5,070	92	<14.5	<8.5	<14	<500	NP	7.22	19.08	0.00	30.59	23.37

NOTE:

ACT	Groundwater well currently used for monitoring	TPHg	= Total Petroleum Hydrocarbons as gasoline	MTBE	= Methyl-tert-butyl ether	DTP	= Depth To Product	" - "	= Not analyzed / Not available
INACT	Groundwater well is NOT included in monitoring program	TPHd	= Total Petroleum Hydrocarbons as diesel	DIPE	= Isopropyl ether	DTW	= Depth To Water	" < "	= Less than detection level indicated
DRY	Groundwater well is dry and cannot be sampled	B	= Benzene	ETBE	= Ethyl-tert-butyl ether	DTB	= Depth To Bottom	" J "	= Flag indicating value between MDL & PQL
NOACC	Presently no access to groundwater well	T	= Toluene	TAME	= Tert-amyl methyl ether	PT	= Product Thickness	NP	= No free product
DEST	Well has been properly destroyed, no longer a conduit to subsurface	E	= Ethylbenzene	TBA	= Tertiary butyl alcohol	GW	= Groundwater		
AB	Groundwater well is abandoned, but not yet destroyed	X	= Total Xylenes						

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
MONITORING WELL #MW-1											
<i>Screen Interval = 5 to 25 feet</i>											
01/09/92	-	-	-	-	-	-	NP	5.54	0.00	98.03	92.49
04/13/92	-	-	-	-	-	-	NP	5.86	0.00	98.03	92.17
10/05/92	-	-	-	-	-	-	NP	9.39	0.00	98.03	88.64
01/06/93	-	-	-	-	-	-	NP	4.76	0.00	98.03	93.27
04/26/93	-	-	-	-	-	-	NP	4.96	0.00	98.03	93.07
01/04/94	-	-	-	-	-	-	NP	7.00	0.00	98.03	91.03
04/05/94	-	-	-	-	-	-	NP	6.44	0.00	98.03	91.59
10/09/95	44,000	4,500	4,300	1,700	10,000	-	-	-	-	98.03	-
01/08/96	21,000	1,200	150	34	4,800	-	NP	6.15	0.00	98.03	91.88
04/08/96	4,700	80	110	10	910	-	NP	5.40	0.00	98.03	92.63
07/22/96	7,000	280	130	<3	2,100	440	NP	5.50	0.00	98.03	92.53
10/16/96	120	<0.3	<0.3	<0.3	<0.5	180	NP	6.02	0.00	98.03	92.01
01/22/97	160	<0.3	<0.3	<0.3	<0.5	360	NP	4.40	0.00	98.03	93.63
04/21/97	20,000	420	140	5.8	840	55,000	NP	6.30	0.00	98.03	91.73
07/14/97	13,000	<0.3	<0.3	<0.3	<0.55	30,000	NP	5.92	0.00	98.03	92.11
10/07/97	-	-	-	-	-	-	7.70	7.71	0.01	98.03	90.33
01/15/98	<50	0.3	<0.3	<0.3	<0.5	-	NP	4.40	0.00	98.03	93.63
04/23/98	540	<0.3	<0.3	<0.3	<0.5	<20	NP	8.10	0.00	98.03	89.93
07/20/98	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	5.55	0.00	98.03	92.48
10/14/98	50	1.4	0.56	<0.3	11	22	NP	7.05	0.00	98.03	90.98
01/21/99	<50	0.59	<0.3	<0.3	<0.5	<5	NP	4.10	0.00	98.03	93.93
04/15/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	4.30	0.00	98.03	93.73
07/26/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	5.54	0.00	98.03	92.49
10/13/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.13	0.00	98.03	91.90
01/20/00	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.04	0.00	98.03	91.99
04/05/00	<50	<0.25	<0.25	<0.25	<0.5	<5	NP	4.03	0.00	98.03	94.00
07/19/00	<50	<0.3	<0.3	<0.3	<0.6	<5	NP	4.00	0.00	98.03	94.03
10/18/00	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	5.53	0.00	98.03	92.50
01/17/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.97	0.00	98.03	94.06
04/19/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.98	0.00	98.03	94.05
07/18/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	5.51	0.00	98.03	92.52
10/10/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.97	0.00	98.03	94.06
01/30/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.95	0.00	98.03	94.08
04/17/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	2.42	0.00	98.03	95.61
07/31/02	<50	<0.18	1.3	<0.18	<0.26	<0.24	NP	5.49	0.00	98.03	92.54
11/14/02	<50	<0.08	<0.18	<0.17	<0.4	16	NP	6.13	0.00	98.03	91.90
01/29/03	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	2.45	0.00	98.03	95.58
04/23/03	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	7.02	0.00	98.03	91.01
07/10/03	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.15	0.00	98.03	92.88
10/20/03	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	5.13	0.00	98.03	92.90

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
01/14/04	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	3.92	0.00	98.03	94.11
04/08/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	4.54	0.00	98.03	93.49
07/21/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	7.01	0.00	98.03	91.02
10/20/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.46	0.00	98.03	92.57
10/20/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.48	0.00	98.03	92.55
01/19/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	6.99	0.00	98.03	91.04
04/20/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	6.42	0.00	98.03	91.61
07/20/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.98	0.00	98.03	91.05
10/19/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	4.56	0.00	98.03	93.47
01/24/06	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	3.93	0.00	98.03	94.10
04/19/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.92	0.00	98.03	92.11
07/19/06	17,100	21	279	388	2,010	128	NP	6.38	0.00	98.03	91.65
09/15/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.99	0.00	98.03	91.04
10/18/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.99	0.00	98.03	91.04
01/17/07	<5.6	<0.32	<0.10	<0.24	<0.3	7.9	NP	5.40	0.00	31.55	26.15
04/18/07	<5.6	<0.32	<0.10	<0.24	<0.3	7.1	NP	5.46	0.00	31.55	26.09
MONITORING WELL #MW-2 <i>Screen Interval = 5 to 25 feet</i>											
01/09/92	-	-	-	-	-	-	NP	5.35	0.00	97.44	92.09
04/13/92	-	-	-	-	-	-	NP	7.42	0.00	97.44	90.02
10/05/92	-	-	-	-	-	-	NP	12.15	0.00	97.44	85.29
01/06/93	-	-	-	-	-	-	NP	5.46	0.00	97.44	91.98
04/26/93	-	-	-	-	-	-	NP	5.15	0.00	97.44	92.29
01/04/94	-	-	-	-	-	-	NP	9.45	0.00	97.44	87.99
04/05/94	-	-	-	-	-	-	NP	8.23	0.00	97.44	89.21
10/09/95	33,000	6,000	390	1,700	4,900	-	-	-	-	97.44	-
01/08/96	<50	0.32	<0.3	0.41	2.1	-	NP	5.60	0.00	97.44	91.84
04/08/96	10,000	490	210	210	830	-	NP	5.43	0.00	97.44	92.01
07/22/96	60,000	6,500	1,000	1,500	10,000	8,500	NP	5.65	0.00	97.44	91.79
10/16/96	6,500	12	0.34	0.72	110	4,700	NP	5.82	0.00	97.44	91.62
01/22/97	3,200	<0.3	0.46	0.37	<0.5	8,000	NP	4.30	0.00	97.44	93.14
04/21/97	66,000	5,300	1,000	2,300	14,000	30,000	NP	5.80	0.00	97.44	91.64
07/14/97	17,000	1.8	4.6	4.6	350	24,000	NP	8.92	0.00	97.44	88.52
10/07/97	220,000	5,200	1,700	3,800	15,000	-	NP	6.80	0.00	97.44	90.64
01/19/98	25,000	5.4	2.2	2.1	240	-	NP	8.50	0.00	97.44	88.94
04/23/98	7,700	<0.3	0.55	0.38	4.9	28,000	NP	7.60	0.00	97.44	89.84
07/20/98	430,000	4,200	10,000	5,400	28,000	77,000	NP	6.94	0.00	97.44	90.50
10/14/98	27,000	<0.3	4.5	4.1	4.6	65,000	NP	8.45	0.00	97.44	88.99
01/21/99	16,000	7.6	9.8	4.2	310	* 49,000 / 42,000	NP	6.95	0.00	97.44	90.49
04/15/99	20,000	<0.3	<0.3	<0.3	<0.5	* 31,000 / 30,000	NP	8.45	0.00	97.44	88.99
07/26/99	6,700	<6	<6	<6	<10	*11,000 / 15,000	NP	6.94	0.00	97.44	90.50
10/13/99	7,600	<3	3.7	<3	11	11,000	NP	5.48	0.00	97.44	91.96

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
01/20/00	7,500	<6	<6	<6	<10	*14,000 / 16,000	NP	5.84	0.00	97.44	91.60
04/05/00	10,400	<0.25	<0.25	<0.25	<0.5	*10,000 / 14,400	NP	5.41	0.00	97.44	92.03
07/19/00	130	<0.3	<0.3	<0.3	<0.6	*9,620 / 6,520	NP	5.40	0.00	97.44	92.04
10/18/00	150	<0.18	<0.14	<0.18	<0.26	*9,090 / 6,560	NP	6.91	0.00	97.44	90.53
01/17/01	75	<0.18	2.0	2.0	3.0	*8,650 / 9,710	NP	5.41	0.00	97.44	92.03
04/19/01	4,380	<0.18	<0.14	<0.18	<0.26	8,890	NP	5.40	0.00	97.44	92.04
07/18/01	3,260	<0.18	<0.14	<0.18	2.0	*7960 / 1,710	NP	6.92	0.00	97.44	90.52
10/10/01	1,760	<0.18	<0.14	<0.18	<0.26	*2,980 / 2,600	NP	3.87	0.00	97.44	93.57
01/30/02	1,770	<0.18	1.0	1.0	2.0	*2,560 / 1,590	NP	8.45	0.00	97.44	88.99
04/17/02	1,470	1.0	<0.14	<0.18	<0.26	*2,460 / 2,080	NP	8.45	0.00	97.44	88.99
07/31/02	3,910	<0.18	1.2	<0.18	2.1	*2,090 / 1,740	NP	9.98	0.00	97.44	87.46
11/14/02	39,400	1,680	728	173	5,120	8,270	NP	5.40	0.00	97.44	92.04
01/29/03	22,100	746	76	<1.0	2,840	8,220	NP	8.43	0.00	97.44	89.01
04/23/03	19,500	<0.8	<0.4	<0.4	<1.2	9,580	NP	5.38	0.00	97.44	92.06
07/10/03	29,900	<2.2	<3.2	<3.1	<4.0	6,690	NP	5.10	0.00	97.44	92.34
10/20/03	13,000	4.79	<0.02	<0.02	<0.06	*6,330 / 5,980	NP	5.10	0.00	97.44	92.34
01/14/04	WELL ABANDONED 01/2004										
MONITORING WELL #MW-2R											
02/03/04							-	-	-	-	
04/08/04	11,600	304	16 J	55	427	4,170	NP	4.58	0.00	-	
07/21/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	6.72	0.00	-	
10/20/04	20,900	3,180	2,970	259	1,240	92	NP	3.72	0.00	-	
01/19/05	18,900	537	250	866	2,290	3,340	NP	4.50	0.00	-	
04/20/05	13,100	<2.2	<3.2	<3.1	<4.0	563	NP	5.27	0.00	-	
07/07/05	2,500	70	7.6	<0.24	160	1,930	-	-	-	-	
07/20/05	4,260	392	15 J	175	100	742	NP	6.12	0.00	-	
10/19/05	321	<0.32	<0.10	<0.24	<0.30	423	NP	5.28	0.00	-	
01/24/06	3,200	34	331	87	510	86	NP	4.58	0.00	-	
04/19/06	22,100	440	4,240	234	1,530	195	NP	3.38	0.00	-	
07/19/06	15,800	377	629	627	578	530	NP	8.10	0.00	-	
09/15/06	-	-	-	-	-	-	-	-	-	-	
10/18/06	57,600	75	5,730	1,770	7,820	263	NP	5.28	0.00	-	
01/17/07	117,000	254	15,200	4,840	28,800	300	NP	6.82	0.00	30.49	23.67
04/18/07	896	<0.32	<0.10	<0.24	117	49	NP	7.60	0.00	30.49	22.89
MONITORING WELL #MW-3 <i>Screen Interval = 5 to 25 feet</i>											
01/09/92	-	-	-	-	-	-	NP	17.60	0.00	97.69	80.09
04/13/92	-	-	-	-	-	-	NP	17.40	0.00	97.69	80.29
10/05/92	-	-	-	-	-	-	NP	17.35	0.00	97.69	80.34

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
01/06/93	-	-	-	-	-	-	NP	17.40	0.00	97.69	80.29
04/26/93	-	-	-	-	-	-	NP	17.90	0.00	97.69	79.79
01/04/94	-	-	-	-	-	-	NP	17.60	0.00	97.69	80.09
04/05/94	-	-	-	-	-	-	NP	16.25	0.00	97.69	81.44
01/08/96	-	-	-	-	-	-	NP	7.11	0.00	97.69	90.58
04/08/96	8,800	610	31	530	900	-	NP	7.20	0.00	97.69	90.49
07/22/96	38,000	4,100	1,500	1,600	5,400	2,600	NP	6.82	0.00	97.69	90.87
10/16/96	2,400	<0.3	<0.3	<0.3	<0.5	3,800	NP	6.84	0.00	97.69	90.85
01/22/97	2,200	<0.3	<0.3	<0.3	<0.5	5,500	NP	4.80	0.00	97.69	92.89
04/21/97	15,000	1,500	36	260	710	11,000	NP	9.40	0.00	97.69	88.29
07/14/97	5,400	0.45	<0.3	<0.3	<0.5	14,000	NP	10.92	0.00	97.69	86.77
10/07/97	8,800	0.39	<0.3	<0.3	0.88	-	NP	11.95	0.00	97.69	85.74
01/19/98	22,000	1,300	15	20	310	-	NP	7.85	0.00	97.69	89.84
04/23/98	9,200	3.9	3.1	5.7	9.8	16,000	NP	11.20	0.00	97.69	86.49
07/20/98	750	0.41	1.4	0.47	1.8	2,800	NP	7.36	0.00	97.69	90.33
10/14/98	750	<0.3	<0.3	<0.3	<0.5	15,000	NP	11.95	0.00	97.69	85.74
01/21/99	4,700	0.32	<0.3	<0.3	<0.5	* 12,000 / 16,000	NP	10.45	0.00	97.69	87.24
04/15/99	7,900	0.59	0.69	<0.3	0.94	* 11,000 / 14,000	NP	7.86	0.00	97.69	89.83
07/26/99	5,200	<3	<3	<3	<5	*9,600 / 11,000	NP	10.40	0.00	97.69	87.29
10/13/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	7.09	0.00	97.69	90.60
01/20/00	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.86	0.00	97.69	90.83
04/05/00	<50	0.8	<0.25	<0.25	<0.5	*5.6 / <5	NP	8.85	0.00	97.69	88.84
07/19/00	<50	<0.3	<0.3	<0.3	<0.6	<5	NP	8.86	0.00	97.69	88.83
10/18/00	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	7.32	0.00	97.69	90.37
01/17/01	<50	<0.18	2.0	<0.18	1.0	*39 / 39	NP	5.40	0.00	97.69	92.29
04/19/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	8.87	0.00	97.69	88.82
07/18/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	7.32	0.00	97.69	90.37
10/10/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	8.87	0.00	97.69	88.82
01/30/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	5.78	0.00	97.69	91.91
04/17/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	7.31	0.00	97.69	90.38
07/31/02	138	1.1	1.2	<0.18	<0.26	<0.24	NP	5.76	0.00	97.69	91.93
11/14/02	<50	<0.08	<0.18	<0.17	<0.4	21	NP	5.73	0.00	97.69	91.96
01/29/03	<15	<0.04	<0.02	<0.02	<0.06	16	NP	7.30	0.00	97.69	90.39
04/23/03	<15	<0.04	<0.02	<0.02	<0.06	16	NP	5.76	0.00	97.69	91.93
07/10/03	<15	<0.22	<0.32	<0.31	<0.4	11	NP	5.63	0.00	97.69	92.06
10/20/03	13,700	4.13	<0.02	<0.02	<0.06	*6,570 / 4,920	NP	5.61	0.00	97.69	92.08
01/14/04	1,160	2.0	2.2	6.1	7.8	*1,510 / 767	NP	4.23	0.00	97.69	93.46
04/08/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.48	0.00	97.69	92.21
07/21/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	6.66	0.00	97.69	91.03
10/20/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	4.20	0.00	97.69	93.49
01/19/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.74	0.00	97.69	91.95

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
04/20/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	7.23	0.00	97.69	90.46
07/20/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.82	0.00	97.69	90.87
10/19/05	<2.9	<0.32	<0.10	<0.24	<0.30	7.0	NP	7.26	0.00	97.69	90.43
01/24/06	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.50	0.00	97.69	92.19
04/19/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.72	0.00	97.69	91.97
07/19/06	12,900	539	744	169	296	1,640	NP	5.63	0.00	97.69	92.06
09/15/06	1,750	4.3	68	11	90	502	NP	6.62	0.00	97.69	91.07
10/18/06	75	<0.32	<0.10	1.1 J	1.1 J	47	NP	5.72	0.00	97.69	91.97
01/17/07	<5.6	<0.32	2.1 J	<0.24	1.0 J	13	NP	5.73	0.00	31.15	25.42
04/18/07	<5.6	<0.32	2.0 J	<0.24	6.2	11	NP	5.74	0.00	31.15	25.41
MONITORING WELL #MW-4 <i>Screen Interval = 4 to 14 feet</i>											
01/09/92	-	-	-	-	-	-	NP	5.25	0.00	97.33	92.08
04/13/92	-	-	-	-	-	-	NP	6.40	0.00	97.33	90.93
10/05/92	-	-	-	-	-	-	NP	9.95	0.00	97.33	87.38
01/06/93	-	-	-	-	-	-	NP	4.10	0.00	97.33	93.23
04/26/93	-	-	-	-	-	-	NP	4.84	0.00	97.33	92.49
01/04/94	-	-	-	-	-	-	NP	9.05	0.00	97.33	88.28
04/05/94	-	-	-	-	-	-	NP	8.10	0.00	97.33	89.23
10/09/95	63,000	9,000	2,100	2,500	9,600	-	-	-	-	97.33	-
01/08/96	23,000	2,200	830	880	3,600	-	NP	5.57	0.00	97.33	91.76
04/08/96	56,000	5,000	2,500	2,600	11,000	-	NP	5.36	0.00	97.33	91.97
07/22/96	33,000	3,700	1,600	1,400	6,000	2,400	NP	4.80	0.00	97.33	92.53
10/16/96	2,800	7.8	0.60	0.41	52	2,000	NP	5.47	0.00	97.33	91.86
01/22/97	1,400	<0.3	<0.3	<0.3	<0.5	3,100	NP	5.15	0.00	97.33	92.18
04/21/97	-	-	-	-	-	-	5.30	6.36	1.06	97.33	91.77
07/14/97	-	-	-	-	-	-	5.21	5.24	0.03	97.33	92.11
10/07/97	-	-	-	-	-	-	7.80	7.82	0.02	97.33	89.53
01/15/98	-	-	-	-	-	-	6.60	6.68	0.08	97.33	90.71
04/23/98	-	-	-	-	-	-	5.30	6.36	1.06	97.33	91.77
07/20/98	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.05	0.00	97.33	91.28
10/14/98	3,100	86	23	2.0	520	1,100	NP	6.85	0.00	97.33	90.48
01/21/99	9,100	3.2	5.6	1.8	130	* 24,000 / 17,000	NP	6.10	0.00	97.33	91.23
04/15/99	14,000	<0.3	0.71	<0.3	<0.5	* 20,000 / 22,000	NP	6.05	0.00	97.33	91.28
07/26/99	4,500	<6	<6	<6	<10	* 8,700 / 9,800	NP	6.07	0.00	97.33	91.26
10/13/99	410	<0.3	0.63	<0.3	<0.5	660	NP	5.54	0.00	97.33	91.79
01/20/00	770	<0.3	<0.3	<0.3	<0.5	* 2,400 / 1,900	NP	5.49	0.00	97.33	91.84
04/05/00	61,200	0.9	<0.25	<0.25	<0.5	* 18,500 / 21,900	NP	5.30	0.00	97.33	92.03
07/19/00	96,600	1,770	1,760	2,690	8,730	21,900 / 9,740 J	NP	5.29	0.00	97.33	92.04
10/18/00	34,900	698	1,010	607	4,130	* 27,800 / 15,900	NP	6.02	0.00	97.33	91.31
01/17/01	29,100	799	930	614	3,400	* 24,300 / 31,400	NP	4.88	0.00	97.33	92.45

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)	
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)						
04/19/01	103,000	4,880	3,980	3,260	11,800	66,900	NP	4.89	0.00	97.33	92.44	
07/18/01	52,200	3,320	2,090	440	5,520	*55,500 / 16,800	NP	6.04	0.00	97.33	91.29	
10/10/01	8,580	6.1	14	5.3	70	*40,100 / 30,000	NP	4.51	0.00	97.33	92.82	
01/30/02	36,500	<0.18	3.0	1.0	3.0	*43,000 / 24,900	NP	4.51	0.00	97.33	92.82	
04/17/02	12,900	8.0	1.0	<0.18	1.0	16,000 / 13,600	NP	4.51	0.00	97.33	92.82	
07/31/02	19,300	<0.18	1.2	1.5	2.6	*13,200 / 10,100	NP	5.26	0.00	97.33	92.07	
11/14/02	36,200	1,720	940	235	6,190	8,280	NP	5.27	0.00	97.33	92.06	
01/29/03	13,000	444	39	<0.4	1,200	8,160	NP	4.50	0.00	97.33	92.83	
04/23/03	7,430	130	5.7	<0.2	387	5,830	NP	4.80	0.00	97.33	92.53	
07/10/03	16,200	<2.2	<3.2	<3.1	<4.0	3,930	NP	4.55	0.00	97.33	92.78	
10/20/03	6,040	672	384	3.4	444	*3,780 / 3,220	NP	4.56	0.00	97.33	92.77	
01/14/04	WELL ABANDONED 01/2004											
MONITORING WELL #MW-4R												
02/03/04							-	-	-	-	-	
04/08/04	37,900	819	424	159	3,190	18,400	NP	4.96	0.00	-	-	
07/21/04	14,500	<2.2	<3.2	<3.1	39 J	18,900	NP	6.60	0.00	-	-	
10/20/04	66,000	6,390	6,560	672	3,290	13,300	NP	3.38	0.00	-	-	
01/19/05	17,600	513	240	855	2,230	3,310	NP	4.32	0.00	-	-	
04/20/05	19,200	190	109	452	974	1,870	NP	4.72	0.00	-	-	
07/07/05	11,500	233	68	369	875	2,350	-	-	-	-	-	
07/20/05	11,300	251	90	154	1,460	1,280	NP	6.08	0.00	-	-	
10/19/05	1,310	<0.32	<0.10	<0.24	<0.30	1,160	NP	5.08	0.00	-	-	
01/24/06	41,300	391	2,310	871	5,430	388	NP	4.98	0.00	-	-	
04/19/06	26,100	399	1,290	254	3,350	732	NP	4.72	0.00	-	-	
07/19/06	34,500	38	1,120	251	3,950	115	NP	6.84	0.00	-	-	
09/15/06	-	-	-	-	-	-	-	-	-	-	-	
10/18/06	37,000	<0.32	3,910	1,350	5,770	389	NP	5.85	0.00	-	-	
01/17/07	211,000	223	22,800	5,670	33,800	<126	NP	6.62	0.00	30.23	23.61	
04/18/07	13,000	52	2,300	97 J	5,140	102	NP	7.02	0.00	30.23	23.21	
MONITORING WELL #MW-5 <i>Screen Interval = 4 to 14 feet</i>												
01/09/92	-	-	-	-	-	-	NP	5.32	0.00	98.85	93.53	
04/13/92	-	-	-	-	-	-	NP	4.82	0.00	98.85	94.03	
10/0/92	-	-	-	-	-	-	NP	8.78	0.00	98.85	90.07	
01/06/93	-	-	-	-	-	-	NP	3.46	0.00	98.85	95.39	
04/26/93	-	-	-	-	-	-	NP	4.66	0.00	98.85	94.19	
01/04/94	-	-	-	-	-	-	NP	6.36	0.00	98.85	92.49	
04/05/94	-	-	-	-	-	-	NP	5.94	0.00	98.85	92.91	
07/12/95	<100	<0.5	<0.5	<0.5	<1	-	-	-	-	98.85	-	
10/09/95	440	31	11	19	84	-	-	-	-	98.85	-	

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
01/08/96	<50	<0.3	<0.3	<0.3	<0.5	-	NP	6.63	0.00	98.85	92.22
04/08/96	<50	<0.3	<0.3	<0.3	<0.5	-	NP	5.22	0.00	98.85	93.63
07/22/96	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	6.62	0.00	98.85	92.23
10/16/96	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	6.12	0.00	98.85	92.73
01/22/97	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	5.17	0.00	98.85	93.68
04/21/97	73	2.5	0.34	0.74	3.8	21	NP	6.64	0.00	98.85	92.21
07/14/97	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	6.67	0.00	98.85	92.18
10/07/97	130	<0.3	<0.3	<0.3	<0.5	-	NP	8.20	0.00	98.85	90.65
01/19/98	85	<0.3	<0.3	<0.3	<0.5	-	NP	1.55	0.00	98.85	97.30
04/23/98	220	0.39	<0.3	<0.3	<0.5	350	NP	8.10	0.00	98.85	90.75
07/20/98	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.30	0.00	98.85	92.55
10/14/98	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	7.65	0.00	98.85	91.20
01/21/99	<50	<0.3	<0.3	<0.3	<0.5	*6.7 / <5	NP	6.15	0.00	98.85	92.70
04/15/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	1.60	0.00	98.85	97.25
07/26/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.13	0.00	98.85	92.72
10/13/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.61	0.00	98.85	92.24
01/20/00	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.14	0.00	98.85	92.71
04/05/00	<50	0.5	<0.25	<0.25	<0.5	*5.4 / <5	NP	4.58	0.00	98.85	94.27
07/19/00	<50	<0.3	<0.3	<0.3	<0.6	<5	NP	4.59	0.00	98.85	94.26
10/18/00	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	6.28	0.00	98.85	92.57
01/17/01	<50	<0.18	<0.14	<0.18	1.0	*5 / 4.8	NP	4.58	0.00	98.85	94.27
04/19/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	4.58	0.00	98.85	94.27
07/18/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	6.12	0.00	98.85	92.73
10/10/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	4.58	0.00	98.85	94.27
01/30/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	4.48	0.00	98.85	94.37
04/17/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	4.58	0.00	98.85	94.27
07/31/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	6.10	0.00	98.85	92.75
11/14/02	<50	<0.08	<0.18	<0.17	<0.4	9	NP	6.11	0.00	98.85	92.74
01/29/03	<15	<0.04	<0.02	<0.02	<0.06	7.1	NP	4.55	0.00	98.85	94.30
04/23/03	<15	<0.04	<0.02	<0.02	<0.06	7.9	NP	3.03	0.00	98.85	95.82
07/10/03	<15	<0.22	<0.32	<0.31	<0.4	7.4	NP	5.25	0.00	98.85	93.60
10/20/03	<15	<0.04	<0.02	<0.02	<0.06	*9.11 / 9.2	NP	5.25	0.00	98.85	93.60
01/14/04	<15	<0.04	<0.02	<0.02	<0.06	*8.2 / 4.1	NP	3.03	0.00	98.85	95.82
04/08/04	797	<0.22	<0.32	<0.31	<0.4	635	NP	4.35	0.00	98.85	94.50
07/21/04	548	<0.22	<0.32	<0.31	<0.4	788	NP	5.56	0.00	98.85	93.29
10/20/04	901	<0.22	<0.32	<0.31	<0.4	734	NP	4.15	0.00	98.85	94.70
01/19/05	350	<0.22	<0.32	<0.31	<0.4	860	NP	4.57	0.00	98.85	94.28
04/20/05	718	<0.22	<0.32	<0.31	<0.4	848	NP	6.10	0.00	98.85	92.75
07/20/05	255	<0.32	<0.10	<0.24	<0.30	274	NP	5.76	0.00	98.85	93.09
10/19/05	225	<0.32	<0.10	<0.24	<0.30	300	NP	6.10	0.00	98.85	92.75
01/24/06	681	<0.32	<0.10	<0.24	<0.30	334	NP	4.34	0.00	98.85	94.51

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
04/19/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	4.58	0.00	98.85	94.27
07/19/06	3,500	11	584	52	208	<0.63	NP	5.56	0.00	98.85	93.29
09/15/06	<5.6	<0.32	<0.10	<0.24	<0.30	1.8	NP	5.81	0.00	98.85	93.04
10/18/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.08	0.00	98.85	92.77
01/17/07	162	<0.32	<0.10	<0.24	<0.3	<0.63	NP	6.09	0.00	32.30	26.21
04/18/07	<5.6	<0.32	<0.10	<0.24	<0.3	<0.63	NP	6.09	0.00	32.30	26.21
MONITORING WELL #MW-6											
<i>Screen Interval = 4 to 14 feet</i>											
01/09/92	-	-	-	-	-	-	NP	6.30	0.00	99.67	93.37
04/13/92	-	-	-	-	-	-	NP	5.47	0.00	99.67	94.20
10/05/92	-	-	-	-	-	-	NP	9.85	0.00	99.67	89.82
01/06/93	-	-	-	-	-	-	NP	4.16	0.00	99.67	95.51
04/26/93	-	-	-	-	-	-	NP	5.75	0.00	99.67	93.92
01/14/94	-	-	-	-	-	-	NP	7.20	0.00	99.67	92.47
04/05/94	-	-	-	-	-	-	NP	6.76	0.00	99.67	92.91
07/10/95	<100	<0.5	0.9	<0.5	1.1	-	-	-	-	99.67	-
10/09/95	250	4.8	5.6	11	58	-	-	-	-	99.67	-
01/08/96	<50	<0.3	<0.3	<0.3	<0.5	-	NP	6.16	0.00	99.67	93.51
04/08/96	230	4.6	4.7	3.2	33	-	NP	4.60	0.00	99.67	95.07
07/22/96	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	7.30	0.00	99.67	92.37
10/16/96	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	5.82	0.00	99.67	93.85
01/22/97	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	4.40	0.00	99.67	95.27
04/21/97	130	<0.3	<0.3	<0.3	<0.5	<20	NP	7.10	0.00	99.67	92.57
07/14/97	<50	<0.3	<0.3	<0.3	0.70	<20	NP	7.35	0.00	99.67	92.32
10/07/97	<50	0.78	0.3	<0.3	<0.5	-	NP	6.98	0.00	99.67	92.69
01/23/98	<50	<0.3	<0.3	<0.3	<0.5	-	NP	2.35	0.00	99.67	97.32
04/23/98	<50	<0.3	<0.3	<0.3	<0.5	<20	NP	6.90	0.00	99.67	92.77
07/20/98	<50	<0.3	1.1	<0.3	1.4	<5	NP	5.45	0.00	99.67	94.22
10/14/98	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	4.95	0.00	99.67	94.72
01/21/99	<50	0.35	0.62	<0.3	<0.5	<5	NP	3.90	0.00	99.67	95.77
04/15/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	2.35	0.00	99.67	97.32
07/26/99	1,000	<0.3	<0.3	<0.3	<0.5	*2,300 / 3,900	NP	3.93	0.00	99.67	95.74
10/13/99	<50	<0.3	<0.3	<0.3	<0.5	<5	NP	6.15	0.00	99.67	93.52
01/20/00	<50	<0.3	<0.3	<0.3	<0.5	*42 / 41	NP	5.84	0.00	99.67	93.83
04/05/00	4,600	338	2.8	1.2	55.2	*282 / 230	NP	3.89	0.00	99.67	95.78
07/19/00	60	1.0	2.0	<0.3	<0.6	*87 / 76	NP	3.07	0.00	99.67	96.60
10/18/00	-	-	-	-	-	-	-	-	-	99.67	-
01/17/01	103	<0.18	2.0	<0.18	3.0	*78 / 106	NP	3.87	0.00	99.67	95.80
04/19/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.86	0.00	99.67	95.81
07/18/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	5.40	0.00	99.67	94.27
10/10/01	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.86	0.00	99.67	95.81

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
01/30/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.86	0.00	99.67	95.81
04/17/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	3.86	0.00	99.67	95.81
07/31/02	<50	<0.18	<0.14	<0.18	<0.26	<0.24	NP	5.40	0.00	99.67	94.27
11/14/02	140	3.2	<0.18	5.2	<0.4	111	NP	5.42	0.00	99.67	94.25
01/29/03	694 J	<0.04	<0.02	<0.02	<0.06	630	NP	3.88	0.00	99.67	95.79
04/23/03	1,550	<0.04	<0.02	<0.02	<0.06	578	NP	3.86	0.00	99.67	95.81
07/10/03	1,670	<0.22	<0.32	<0.31	<0.4	509	NP	5.31	0.00	99.67	94.36
10/20/03	1,320	<0.04	<0.02	<0.02	<0.06	*656 / 662	NP	5.30	0.00	99.67	94.37
01/14/04	272	<0.04	<0.02	<0.02	<0.06	*304 / 180	NP	3.82	0.00	99.67	95.85
04/08/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.18	0.00	99.67	94.49
07/21/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	6.42	0.00	99.67	93.25
10/20/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.62	0.00	99.67	94.05
01/19/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.40	0.00	99.67	94.27
04/20/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.41	0.00	99.67	94.26
07/20/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	4.07	0.00	99.67	95.60
10/19/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	3.86	0.00	99.67	95.81
01/24/06	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.20	0.00	99.67	94.47
04/19/06	78	<0.32	<0.10	<0.24	<0.30	201	NP	3.87	0.00	99.67	95.80
07/19/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.54	0.00	99.67	93.13
09/15/06	-	-	-	-	-	-	-	-	-	-	-
10/18/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.40	0.00	99.67	94.27
01/17/07	<5.6	<0.32	<0.10	<0.24	<0.3	<0.63	NP	5.40	0.00	33.14	27.74
04/18/07	2,110	29	357	37	914	<0.63	NP	5.40	0.00	33.14	27.74
MONITORING WELL #MW-7 <i>Screen Interval = 4 to 14 feet</i>											
01/09/92	-	-	-	-	-	-	NP	6.30	0.00	99.02	92.72
04/13/92	-	-	-	-	-	-	NP	6.68	0.00	99.02	92.34
10/05/92	-	-	-	-	-	-	NP	9.60	0.00	99.02	89.42
01/06/93	-	-	-	-	-	-	NP	13.90	0.00	99.02	85.12
04/26/93	-	-	-	-	-	-	NP	5.55	0.00	99.02	93.47
01/04/94	-	-	-	-	-	-	NP	7.58	0.00	99.02	91.44
04/05/94	-	-	-	-	-	-	NP	6.66	0.00	99.02	92.36
10/09/95	27,000	2,400	140	1,700	2,700	-	-	-	-	99.02	-
01/08/96	13,000	800	42	540	860	-	NP	6.94	0.00	99.02	92.08
04/08/94	9,100	840	31	690	1,200	-	NP	5.48	0.00	99.02	93.54
07/22/96	11,000	1,700	22	660	700	840	NP	6.60	0.00	99.02	92.42
10/16/96	180	<0.3	<0.3	<0.3	<0.5	270	NP	6.42	0.00	99.02	92.60
01/22/97	130	<0.3	<0.3	<0.3	<0.5	470	NP	5.70	0.00	99.02	93.32
04/21/97	10,000	1,400	27	820	490	1,100	NP	5.30	0.00	99.02	93.72
07/14/97	8,200	660	15	230	270	560	NP	7.90	0.00	99.02	91.12
10/07/97	7,700	480	15	8.4	350	-	NP	7.70	0.00	99.02	91.32

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
01/19/98	1,400	20	0.74	0.46	4.4	-	NP	6.05	0.00	99.02	92.97
04/23/98	590	<0.3	<0.3	<0.3	<0.5	1,700	NP	7.60	0.00	99.02	91.42
07/20/98	4,900	570	150	300	500	1,500	NP	5.30	0.00	99.02	93.72
10/14/98	1,100	1.0	<0.3	<0.3	5.3	2,000	NP	8.60	0.00	99.02	90.42
01/21/99	570	0.32	<0.3	<0.3	<0.5	* 1,500 / 1,700	NP	6.70	0.00	99.02	92.32
04/15/99	770	<0.3	<0.3	<0.3	<0.5	* 1,400 / 1,200	NP	6.07	0.00	99.02	92.95
07/26/99	500	<0.3	<0.3	<0.3	<0.5	*710 / 950	NP	7.86	0.00	99.02	91.16
10/13/99	<50	<0.3	0.44	<0.3	0.62	<5	NP	6.93	0.00	99.02	92.09
01/20/00	<50	<0.3	<0.3	<0.3	<0.5	*5 / <5	NP	6.44	0.00	99.02	92.58
04/05/00	5,670	415	19	1.7	60.1	*329 / 194	NP	7.86	0.00	99.02	91.16
07/19/00	1,350	14	<3	<3	10	*237 / 120	NP	7.10	0.00	99.02	91.92
10/18/00	<50	<0.18	<0.14	<0.18	<0.26	*63 / 41.1	NP	5.28	0.00	99.02	93.74
01/17/01	<50	<0.18	<0.14	<0.18	3.0	*57 / 81	NP	5.27	0.00	99.02	93.75
04/19/01	<50	<0.18	<0.14	<0.18	<0.26	66	NP	7.86	0.00	99.02	91.16
07/18/01	<50	<0.18	<0.14	<0.18	<0.26	*9 / 3.5	NP	6.30	0.00	99.02	92.72
10/10/01	<50	<0.18	<0.14	<0.18	<0.26	*9.4 / 7.9	NP	8.23	0.00	99.02	90.79
01/30/02	2,590	40	9.0	8.0	6.0	*45 / 22	NP	5.14	0.00	99.02	93.88
04/17/02	51	<0.18	<0.14	<0.18	<0.26	*58 / 45	NP	5.53	0.00	99.02	93.49
07/31/02	<50	<0.18	<0.14	<0.18	<0.26	*39 / 33	NP	5.93	0.00	99.02	93.09
11/14/02	<50	<0.08	<0.18	<0.17	<0.4	6.8	NP	5.92	0.00	99.02	93.10
01/29/03	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	5.51	0.00	99.02	93.51
04/23/03	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	5.14	0.00	99.02	93.88
07/10/03	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.03	0.00	99.02	93.99
10/20/03	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	5.01	0.00	99.02	94.01
01/14/04	<15	<0.04	<0.02	<0.02	<0.06	<0.03	NP	4.38	0.00	99.02	94.64
04/08/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	4.86	0.00	99.02	94.16
07/21/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	6.82	0.00	99.02	92.20
10/20/04	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.71	0.00	99.02	93.31
01/19/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	4.77	0.00	99.02	94.25
04/20/05	<15	<0.22	<0.32	<0.31	<0.4	<0.18	NP	5.54	0.00	99.02	93.48
07/20/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	6.80	0.00	99.02	92.22
10/19/05	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.89	0.00	99.02	93.13
01/24/06	<2.9	<0.32	<0.10	<0.24	<0.30	<0.63	NP	4.89	0.00	99.02	94.13
04/19/06	<5.6	<0.32	<0.10	<0.24	<0.30	2.9	NP	5.13	0.00	99.02	93.89
07/19/06	3,430	58	28 J	<2.4	447	528	NP	6.31	0.00	99.02	92.71
09/15/06	<5.6	<0.32	<0.10	<0.24	<0.30	16	NP	6.72	0.00	99.02	92.30
10/18/06	<5.6	<0.32	<0.10	<0.24	<0.30	<0.63	NP	5.13	0.00	99.02	93.89
01/17/07	<5.6	<0.32	<0.10	<0.24	<0.3	<0.63	NP	6.62	0.00	31.61	24.99
04/18/07	<5.6	<0.32	<0.10	<0.24	<0.3	<0.63	NP	5.86	0.00	31.61	25.75

MONITORING WELL #RW-1

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)	
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)						
01/09/92	-	-	-	-	-	-	NP	14.00	0.00	-	-	
04/13/92	-	-	-	-	-	-	NP	14.00	0.00	-	-	
10/05/92	-	-	-	-	-	-	NP	15.05	0.00	-	-	
01/06/93	-	-	-	-	-	-	NP	5.43	0.00	-	-	
04/26/93	-	-	-	-	-	-	NP	13.20	0.00	-	-	
0104/94	-	-	-	-	-	-	NP	14.30	0.00	-	-	
04/05/94	-	-	-	-	-	-	NP	14.13	0.00	-	-	
01/08/96	-	-	-	-	-	-	NP	14.22	0.00	-	-	
04/08/96	-	-	-	-	-	-	NP	14.33	0.00	-	-	
07/22/96	8,100	530	84	120	860	-	NP	14.27	0.00	-	-	
10/16/96	-	-	-	-	-	-	NP	13.10	0.00	-	-	
01/22/97	-	-	-	-	-	-	NP	16.97	0.00	-	-	
10/07/97	-	-	-	-	-	-	NP	14.20	0.00	-	-	
01/15/98	-	-	-	-	-	-	NP	15.60	0.00	-	-	
04/23/98	81,000	0.72	1.4	3.2	5.7	270,000	NP	14.20	0.00	-	-	
07/20/98	-	-	-	-	-	-	NP	14.30	0.00	-	-	
10/14/98	-	-	-	-	-	-	NP	11.20	0.00	-	-	
01/21/99	-	-	-	-	-	-	-	-	-	-	-	
04/15/99	-	-	-	-	-	-	NP	13.10	0.00	-	-	
07/26/99	4,400	<3	<3	<3	<5	*6,800 / 9,000	NP	13.83	0.00	-	-	
10/13/99	-	-	-	-	-	-	-	-	-	-	-	
01/20/00	-	-	-	-	-	-	NP	13.22	0.00	-	-	
04/05/00	-	-	-	-	-	-	-	-	-	-	-	
07/19/00	-	-	-	-	-	-	NP	13.25	0.00	-	-	
10/18/00	-	-	-	-	-	-	NP	11.14	0.00	-	-	
01/17/01	-	-	-	-	-	-	NP	11.12	0.00	-	-	
04/19/01	-	-	-	-	-	-	-	-	-	-	-	
07/18/01	-	-	-	-	-	-	NP	11.20	0.00	-	-	
10/10/01	-	-	-	-	-	-	NP	11.20	0.00	-	-	
01/30/02	-	-	-	-	-	-	NP	12.30	0.00	-	-	
04/17/02	-	-	-	-	-	-	NP	14.30	0.00	-	-	
07/31/02	-	-	-	-	-	-	NP	14.21	0.00	-	-	
11/14/02	-	-	-	-	-	-	NP	14.13	0.00	-	-	
01/29/03	-	-	-	-	-	-	NP	13.12	0.00	-	-	
04/23/03	-	-	-	-	-	-	-	No Access	-	-	-	
07/10/03	-	-	-	-	-	-	-	No Access	-	-	-	
10/20/03	-	-	-	-	-	-	-	No Access	-	-	-	
01/14/04	WELL ABANDONED 01/2004											
MONITORING WELL #RW-1R												
02/03/04							-	-	-	-	-	

**TABLE 1
GROUNDWATER DATA
THRIFTY OIL STATION #049, OAKLAND, CA.**

DATE SAMPLED	ANALYTICAL PARAMETERS						DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
	TPH (ug/L)	BENZENE (ug/L)	TOLUENE (ug/L)	EthylBenzene (ug/L)	XYLENE (ug/L)	MTBE (ug/L)					
04/08/04	6,740	42	32 J	<3.1	1,160	239	NP	4.76	0.00	-	-
07/21/04	118	<0.22	<0.32	<0.31	<0.4	107	NP	6.85	0.00	-	-
10/20/04	29,900	3,850	4,010	381	1,920	103	NP	4.28	0.00	-	-
01/19/05	13,400	272	243	24 J	2,230	2,110	NP	4.54	0.00	-	-
04/20/05	1,220	<0.22	<0.32	<0.31	<0.4	1,580	NP	4.95	0.00	-	-
07/07/05	6,490	410	74	84	620	2,560	-	-	-	-	-
07/20/05	4,900	133	52	<2.4	750	465	NP	6.32	0.00	-	-
10/19/05	572	<0.32	<0.10	<0.24	<0.30	417	NP	5.68	0.00	-	-
01/24/06	14,500	192	1,150	342	2,980	432	NP	4.78	0.00	-	-
04/19/06	7,430	94	411	<2.4	1,820	571	NP	4.94	0.00	-	-
07/19/06	5,020	55	17 J	<2.4	457	636	NP	7.10	0.00	-	-
09/15/06	-	-	-	-	-	-	-	-	-	-	-
10/18/06	41,500	63	4,710	1,510	6,390	343	NP	6.06	0.00	-	-
01/17/07	164,000	249	25,300	6,040	35,200	217	NP	6.83	0.00	30.59	23.76
04/18/07	13,000	<16	2,230	121 J	5,070	92	NP	7.22	0.00	30.59	23.37

NOTE:
 * MTBE 8020 / 8260
 ND = Nondetectable
 NP = No free hydrocarbon product
 " - " = Not analyzed / Not available

Benzene, toluene, ethylbenzene, and xylene analyzed by EPA method 8020.
 Total petroleum hydrocarbons (TPH) analyzed by EPA method 8015 modified for gasoline
 Methyl-tert Butyl Ether (MTBE) analyzed by EPA method 8020 or 8260
 On 7/21/04, 4/08/04, 7/10/03 & 11/14/02, BTEX and MTBE done by 8260B

**TABLE 2
ADDITIONAL GROUNDWATER DATA
THRIFTY OIL STATION # 049, OAKLAND, CA.**

DATE SAMPLED	DIPE (ug/L)	ETBE (ug/L)	TAME (ug/L)	TBA (ug/L)	Ethanol (ug/L)	Methanol (ug/L)
MONITORING WELL # MW-1						
11/14/02	<0.2	<0.12	<0.16	<10	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<0.29	<0.17	<0.28	<10	-	-
10/20/03	-	-	-	-	-	-
01/14/04	-	-	-	-	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/20/05	<0.29	<0.17	<0.28	<10	<20	<20
10/19/05	<0.29	<0.17	<0.28	12	<20	<20
01/24/06	<0.29	<0.17	<0.28	<10	<20	<20
04/19/06	<0.29	<0.17	<0.28	<10	<20	<20
07/19/06	<2.9	<1.7	<2.8	<100	-	-
09/15/06	<0.29	<0.17	<0.28	<10	-	-
10/18/06	<0.29	<0.17	<0.28	<10	-	-
01/17/07	<0.29	<0.17	<0.28	<10	-	-
04/18/07	<0.29	<0.17	<0.28	<10	-	-
MONITORING WELL # MW-2						
11/14/02	<2.0	<1.2	111	341	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<2.9	<1.7	59	449	-	-
10/20/03	-	-	-	-	-	-
WELL ABANDONED 01/2004						
MONITORING WELL # MW-2R						
02/03/04	<0.29	<0.17	76	1,610	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/07/05	<0.29	<0.17	37	1,130	-	-
07/20/05	<0.29	<0.17	95	151	<20	<20
10/19/05	<0.29	<0.17	13	33	<20	<20
01/24/06	<0.29	<0.17	<0.28	42	<20	<20
04/19/06	<5.8	<3.4	<5.6	<200	<20	<20
07/19/06	<2.9	<1.7	68	113	-	-
09/15/06	-	-	-	-	-	-
10/18/06	<0.29	<0.17	<0.28	174	-	-
01/17/07	<58.0	<34.0	<56.0	<2000	-	-
04/18/07	<0.29	<0.17	5.2	122	-	-
MONITORING WELL # MW-3						
11/14/02	<0.2	<0.12	<0.16	<10	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<0.29	<0.17	<0.28	<10	-	-
10/20/03	-	-	-	-	-	-
01/14/04	-	-	-	-	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/20/05	<0.29	<0.17	<0.28	<10	<20	<20
10/19/05	<0.29	<0.17	<0.28	<10	<20	<20
01/24/06	<0.29	<0.17	<0.28	<10	<20	<20
04/19/06	<0.29	<0.17	<0.28	<10	<20	<20

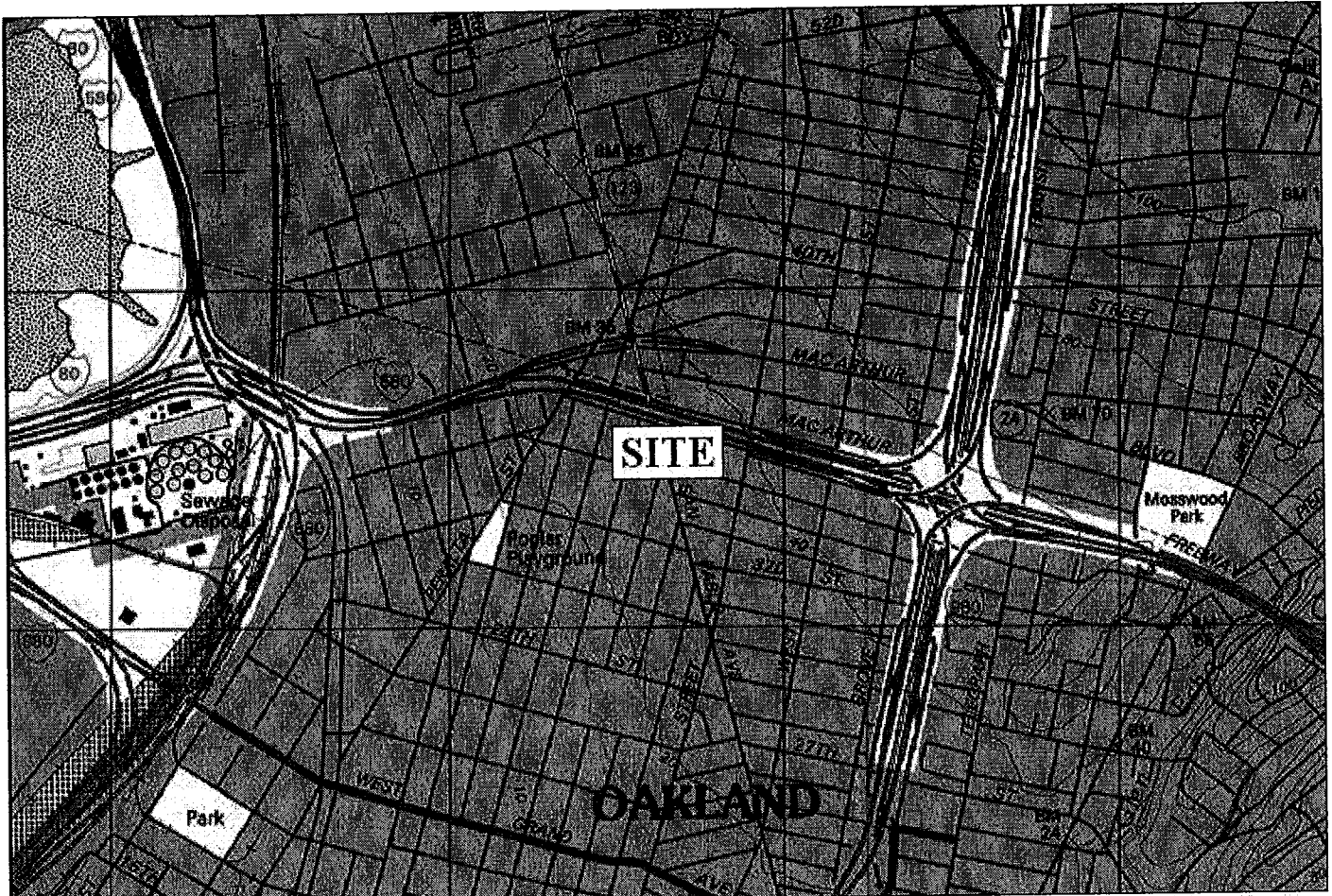
**TABLE 2
ADDITIONAL GROUNDWATER DATA
THRIFTY OIL STATION # 049, OAKLAND, CA.**

DATE SAMPLED	DIPE (ug/L)	ETBE (ug/L)	TAME (ug/L)	TBA (ug/L)	Ethanol (ug/L)	Methanol (ug/L)
07/19/06	<2.9	<1.7	173	128	-	-
09/15/06	<0.29	<0.17	38	<10	-	-
10/18/06	<0.29	<0.17	2.8	<10	-	-
01/17/07	<0.29	<0.17	<0.28	16	-	-
04/18/07	<0.29	<0.17	<0.28	18	-	-
MONITORING WELL # MW-4						
11/14/02	<2.0	<1.2	106	281	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<2.9	<1.7	35	<100	-	-
10/20/03	-	-	-	-	-	-
WELL ABANDONED 01/2004						
MONITORING WELL # MW-4R						
02/03/04	<0.29	<0.17	209	1,350	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/07/05	<0.29	<0.17	57	167	-	-
07/20/05	<0.29	<0.17	<0.28	369	<20	<20
10/19/05	<0.29	<0.17	39	335	<20	<20
01/24/06	<0.29	<0.17	<0.28	<10	<20	<20
04/19/06	<2.9	<1.7	36	231	<20	<20
07/19/06	<2.9	<1.7	<2.8	<100	-	-
09/15/06	-	-	-	-	-	-
10/18/06	<0.29	<0.17	<0.28	<10	-	-
01/17/07	<58.0	<34.0	<56.0	<2000	-	-
04/18/07	<14.5	<8.5	<14	<500	-	-
MONITORING WELL # MW-5						
11/14/02	<0.2	<0.12	<0.16	<10	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<0.29	<0.17	<0.28	<10	-	-
10/20/03	-	-	-	-	-	-
01/14/04	-	-	-	-	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/20/05	<0.29	<0.17	<0.28	<10	<20	<20
10/19/05	<0.29	<0.17	1.4	<10	<20	<20
01/24/06	<0.29	<0.17	1.2	19	<20	<20
04/19/06	<0.29	<0.17	<0.28	<10	<20	<20
07/19/06	<0.29	<0.17	<0.28	<10	-	-
09/15/06	<0.29	<0.17	<0.28	<10	-	-
10/18/06	<0.29	<0.17	<0.28	<10	-	-
01/17/07	<0.29	<0.17	<0.28	<10	-	-
04/18/07	<0.29	<0.17	<0.28	<10	-	-
MONITORING WELL # MW-6						
11/14/02	<0.2	<0.12	<0.16	<10	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<0.29	<0.17	2.1	38	-	-
10/20/03	-	-	-	-	-	-
01/14/04	-	-	-	-	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-

**TABLE 2
ADDITIONAL GROUNDWATER DATA
THRIFTY OIL STATION # 049, OAKLAND, CA.**

DATE SAMPLED	DIPE (ug/L)	ETBE (ug/L)	TAME (ug/L)	TBA (ug/L)	Ethanol (ug/L)	Methanol (ug/L)
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/20/05	<0.29	<0.17	<0.28	<10	<20	<20
10/19/05	<0.29	<0.17	<0.28	<10	<20	<20
01/24/06	<0.29	<0.17	<0.28	<10	<20	<20
04/19/06	<0.29	<0.17	<0.28	13	<20	<20
07/19/06	<0.29	<0.17	<0.28	<10	-	-
09/15/06	-	-	-	-	-	-
10/18/06	<0.29	<0.17	<0.28	<10	-	-
01/17/07	<0.29	<0.17	<0.28	<10	-	-
04/18/07	<0.29	<0.17	<0.28	<10	-	-
MONITORING WELL # MW-7						
11/14/02	<0.2	<0.12	<0.16	<10	-	-
01/29/03	-	-	-	-	-	-
04/23/03	-	-	-	-	-	-
07/10/03	<0.29	<0.17	<0.28	<10	-	-
10/20/03	-	-	-	-	-	-
01/14/04	-	-	-	-	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/20/05	<0.29	<0.17	<0.28	<10	<20	<20
10/19/05	<0.29	<0.17	<0.28	<10	<20	<20
01/24/06	<0.29	<0.17	<0.28	<10	<20	<20
04/19/06	<0.29	<0.17	<0.28	<10	<20	<20
07/19/06	<2.9	<1.7	25	216	-	-
09/15/06	<0.29	<0.17	<0.28	<10	-	-
10/18/06	<0.29	<0.17	<0.28	<10	-	-
01/17/07	<0.29	<0.17	<0.28	<10	-	-
04/18/07	<0.29	<0.17	<0.28	<10	-	-
MONITORING WELL # RW-1R						
02/03/04	<0.29	<0.17	53	1,370	-	-
04/08/04	-	-	-	-	-	-
07/21/04	-	-	-	-	-	-
10/20/04	-	-	-	-	-	-
01/19/05	-	-	-	-	-	-
04/20/05	-	-	-	-	-	-
07/07/05	<0.29	<0.17	71	1,740	-	-
07/20/05	<0.29	<0.17	<0.28	<10	<20	<20
10/19/05	<0.29	<0.17	9.6	65	<20	<20
01/24/06	<2.9	<1.7	<2.8	156	<20	<20
04/19/06	<2.9	<1.7	11	206	<20	<20
07/19/06	<2.9	<1.7	<2.8	217	-	-
09/15/06	-	-	-	-	-	-
10/18/06	<0.29	<0.17	<0.28	209	-	-
01/17/07	<58.0	<34.0	<56.0	<2000	-	-
04/18/07	<14.5	<8.5	<14	<500	-	-

NOTE: DIPE, ETBE, TAME, TBA analyzed by EPA Method 8260B



TN * MN
15°

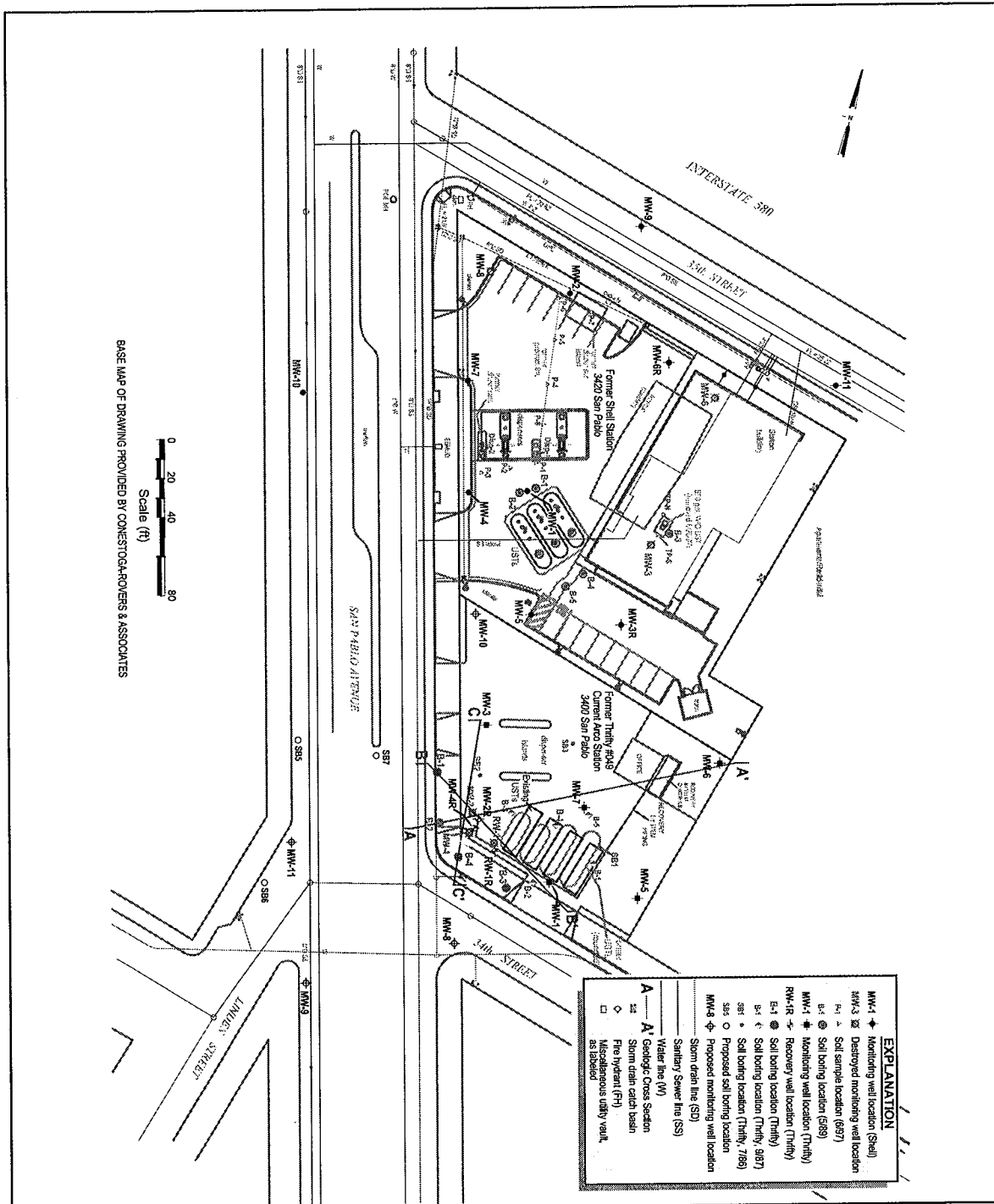


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EQUIPOISE
CORPORATION
1401 El Camino Real, Suite 107
San Clemente, California 92672
Phone: 949 366 0266
Fax: 949 366 0281

SITE VICINITY MAP
3400 San Pablo Avenue
Oakland, California

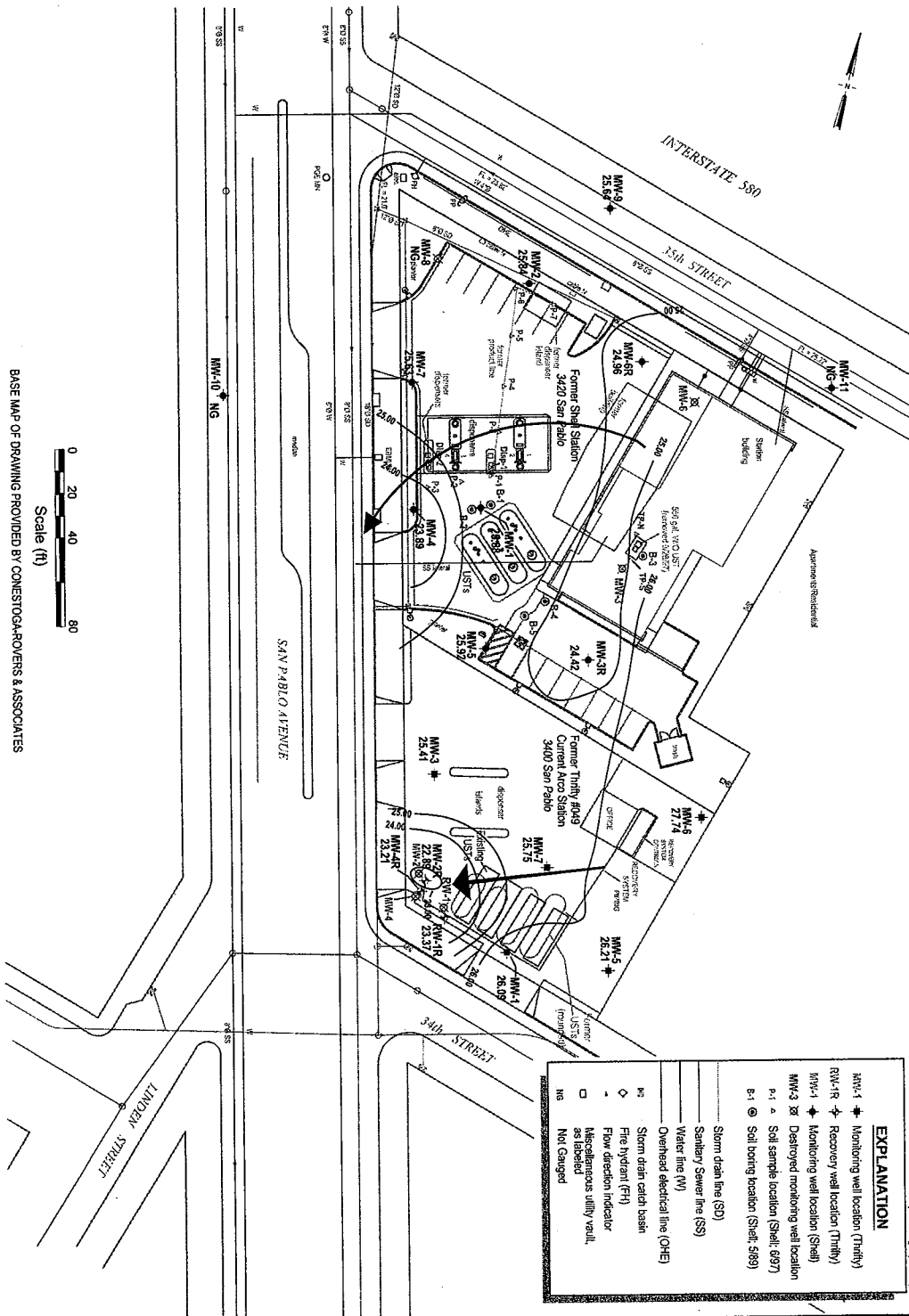
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DATE:	7/12/07



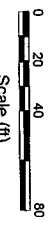
EQUIPOSE CORPORATION
 1401 El Camino Real, Suite 107
 San Clemente, California 92672
 Phone: 949 366 0266
 Fax: 949 366 0261

SITE PLAN
 Thrifty Service Station #049
 3400 San Pablo Avenue
 Oakland, California

FIGURE: **2**
 REVISION NO: **0**
 DATE: **06/07**



BASE MAP OF DRAWING PROVIDED BY CONESTOGA-ROVERS & ASSOCIATES

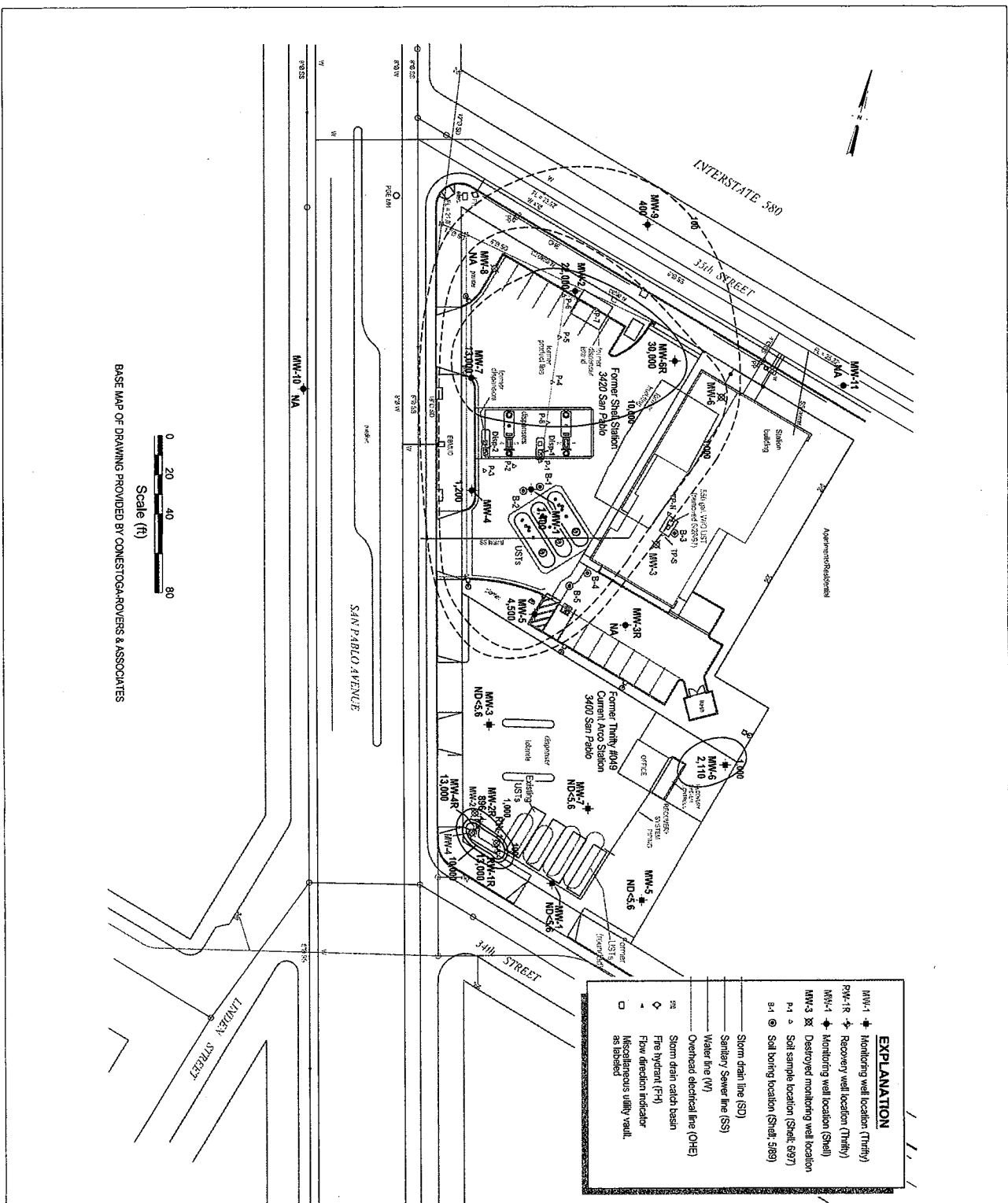


EXPLANATION	
MW-1	Monitoring well location (Thrifty)
RW-1, RW-2	Recovery well location (Thrifty)
MW-1	Monitoring well location (Shell)
MW-3, MW-4	Destroyed monitoring well location
B-1	Soil sample location (Shell, 6/97)
B-1	Soil boring location (Shell, 5/89)
Storm drain line (SD)	
Sanitary Sewer line (SS)	
Water line (W)	
Overhead electrical line (OHE)	
W	Storm drain catch basin
◇	Fire hydrant (FH)
—	Flow direction indicator
□	Intelligent utility vault, as labeled
NG	Not Gauged

EQUIPOISE CORPORATION
 1401 El Camino Real, Suite 107
 San Clemente, California 92672
 Phone: 949 368 0266
 Fax: 949 368 0281

GROUNDWATER CONTOUR MAP
 Thrifty Service Station #049
 3400 San Pablo Avenue
 Oakland, California

FIGURE: **3**
 REVISION NO: 0
 DATE: 06/07

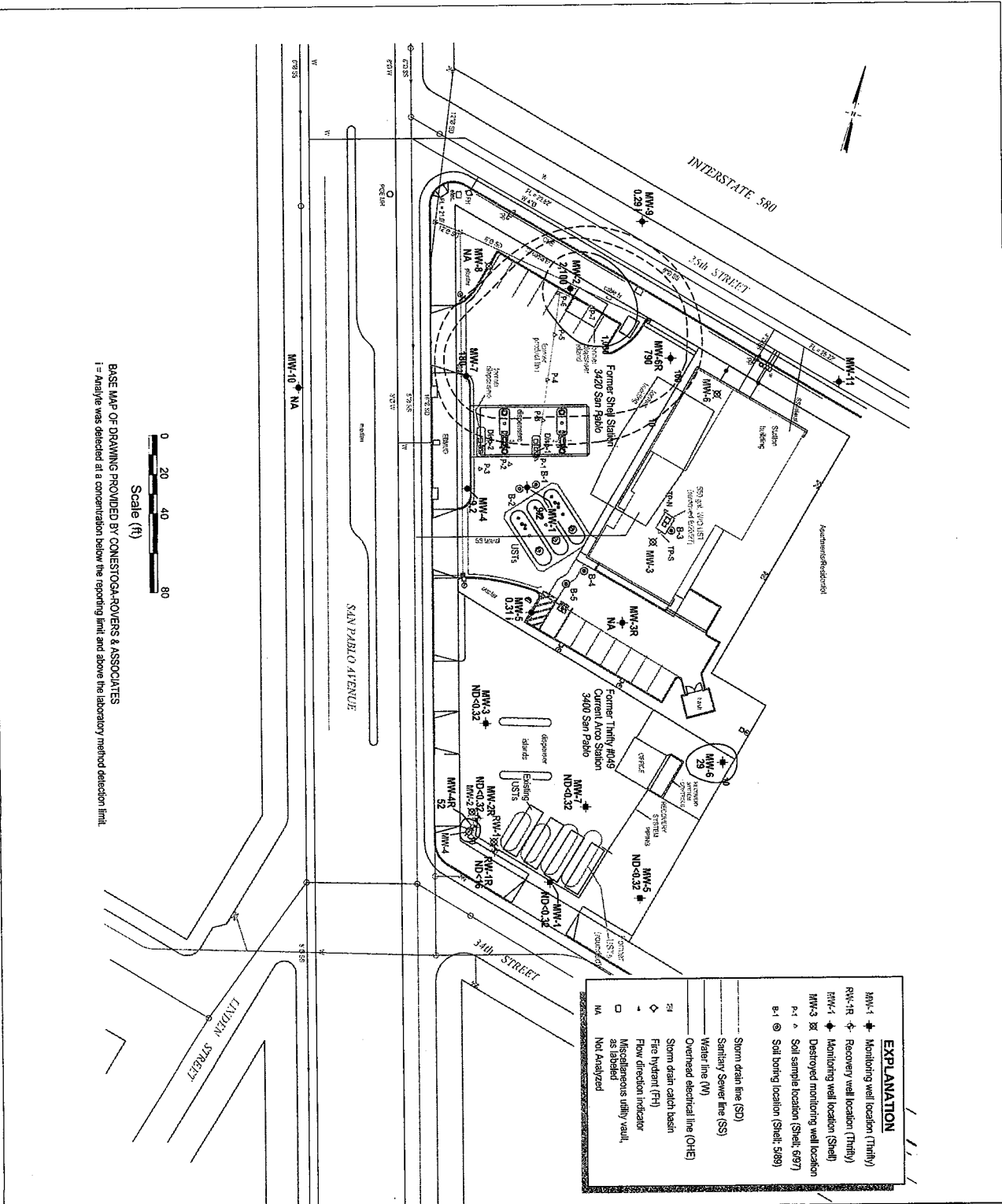


Scale (ft)
 0 20 40 80
 BASE MAP OF DRAWING PROVIDED BY CONESTOGA-ROVERS & ASSOCIATES

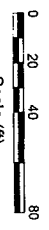
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 1401 El Camino Real, Suite 107
 San Clemente, California 92672
 Phone: 949 368 0266
 Fax: 949 368 0281

TPHg Isoconcentration Map
 Thrifty Service Station #049
 3400 San Pablo Avenue
 Oakland, California

FIGURE: **4**
 REVISION NO: 0
 DATE: 06/07



BASE MAP OF DRAWING PROVIDED BY CONESTOGA-ROVERS & ASSOCIATES
 1 = Analyte was detected at a concentration below the reporting limit and above the laboratory method detection limit.

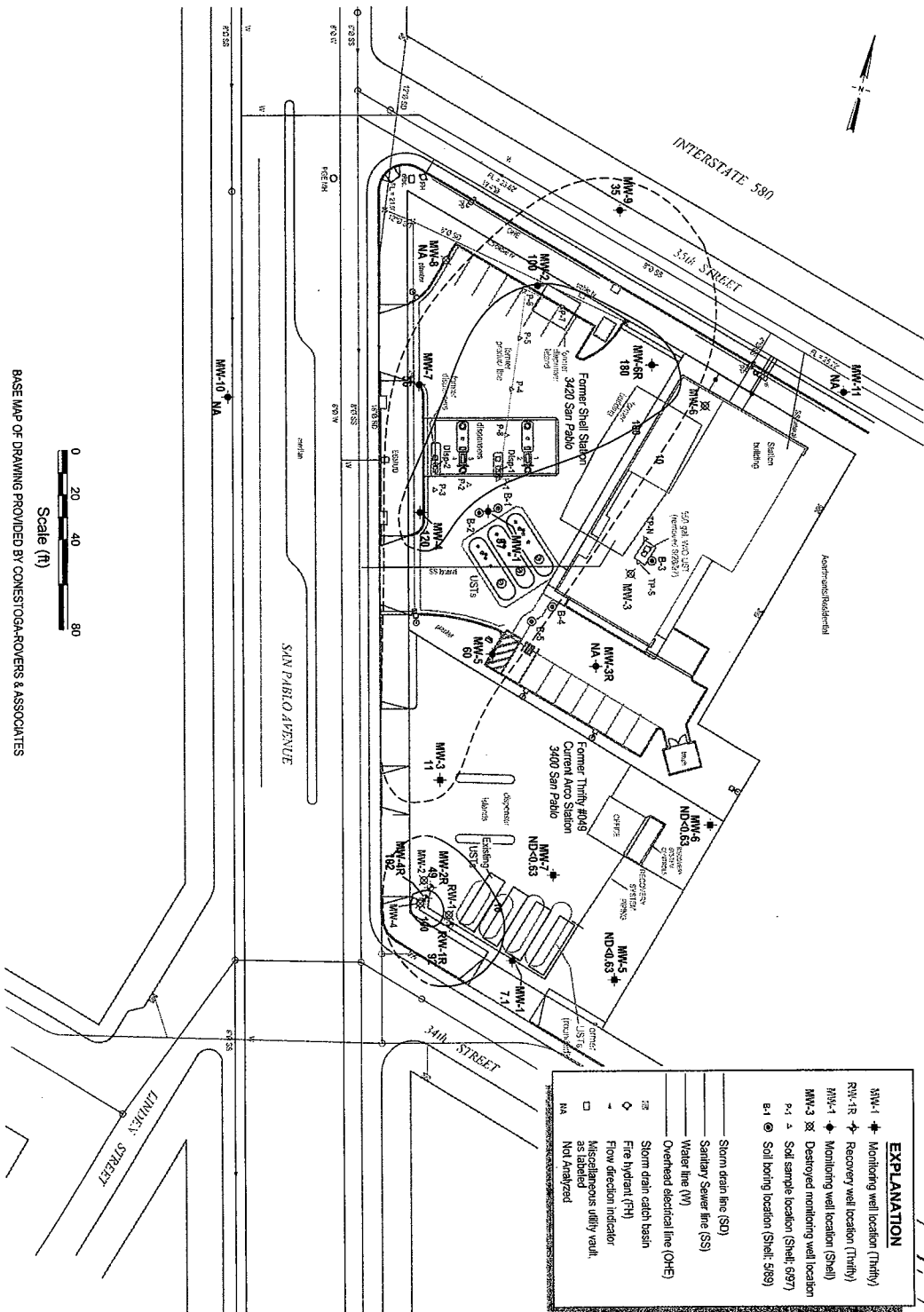


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 San Clemente, California 92672
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 Fax: 949 386 0281

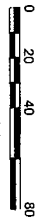
Benzene Isoconcentration Map
Thrifty Service Station #049
3400 San Pablo Avenue
Oakland, California

FIGURE: **5**
 REVISION NO: **0**
 DATE: **06/07**

EXPLANATION	
MW-1	Monitoring well location (Thrifty)
RW-1R	Recovery well location (Thrifty)
RW-1	Horizontal well location (Shell)
MW-3	Destroyed monitoring well location
P-1	Soil sample location (Sheet: 687)
B-1	Soil boring location (Sheet: 509)
NA	Not Analyzed
---	Storm drain line (SD)
---	Water line (W)
---	Overhead electrical line (OHE)
---	Sanitary Sewer line (SS)
---	Storm drain catch basin
---	Fire hydrant (FH)
---	Flow direction indicator
---	Miscellaneous utility vault, as labeled
---	Not Analyzed



BASE MAP OF DRAWING PROVIDED BY CONESTOGA-COVERERS & ASSOCIATES

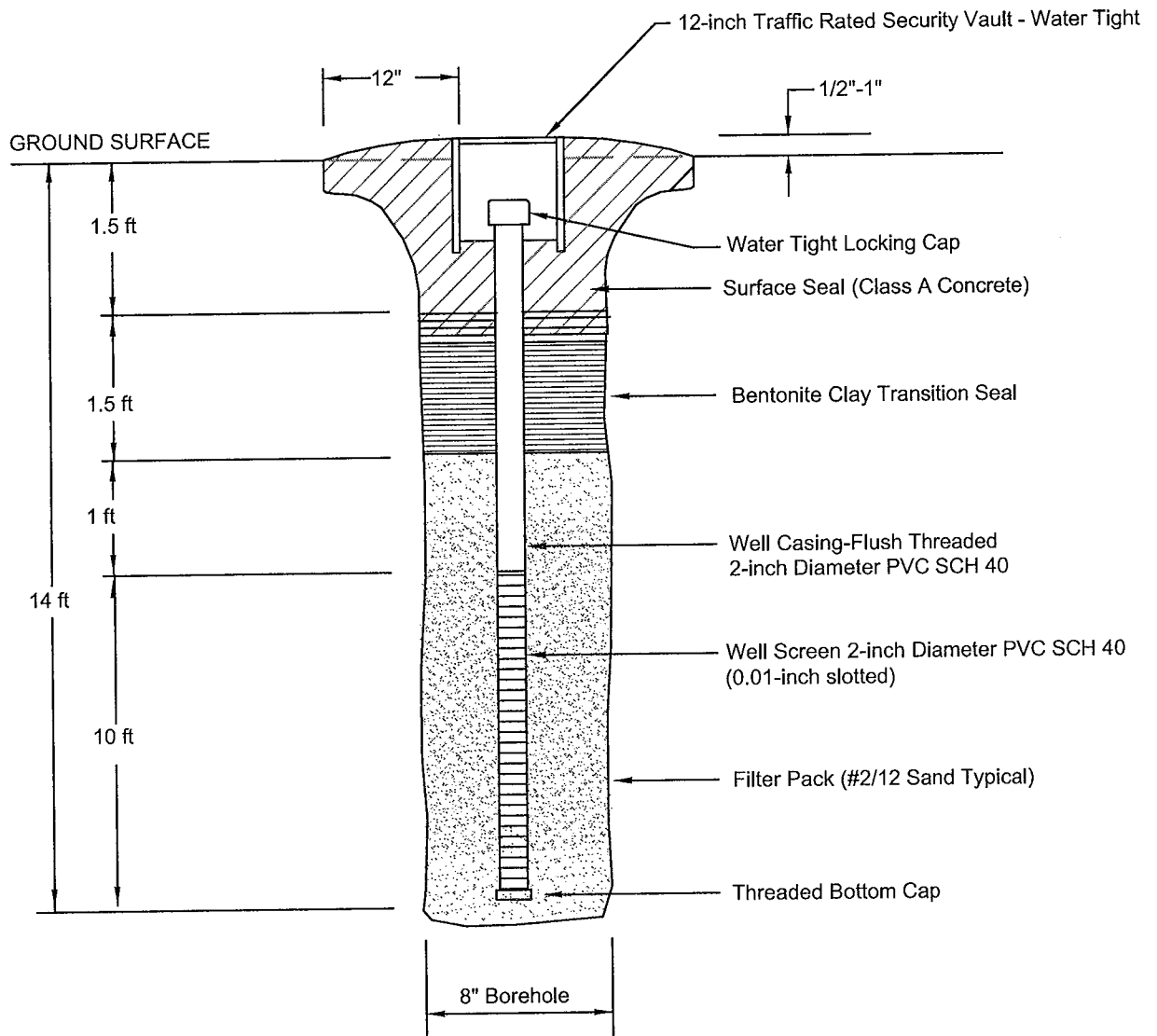


EXPLANATION	
MW-1	Monitoring well location (Thrifty)
RW-1R	Recovery well location (Thrifty)
MW-1	Monitoring well location (Shell)
MW-3	Destroyed monitoring well location
P-1	Soil sample location (Shell: 5/87)
B-1	Soil boring location (Shell: 5/89)
NA	Not Analyzed
SS	Storm drain catch basin
FW	Fire hydrant (FH)
FDI	Flow direction indicator
MUV	Miscellaneous utility vent, as labeled
NA	Not Analyzed
SD	Storm drain line (SD)
SS	Sanitary Sewer line (SS)
WF	Water line (WF)
OHL	Overhead electrical line (OHE)

EQUIPOISE CORPORATION
 1401 El Carrizo Real, Suite 107
 San Clemente, California 92672
 Phone: 949 386 0266
 Fax: 949 386 0261

MTBE Isoconcentration Map
 Thrifty Service Station #049
 3400 San Pablo Avenue
 Oakland, California

FIGURE: **6**
 REVISION NO: 0
 DATE: 06/07



LEGEND

PVC POLYVINYL CHLORIDE
 SCH SCHEDULE
 ft FEET

NOT TO SCALE

EQUIPOISE
 CORPORATION

1401 El Camino Real, Suite 107
 San Clemente, California 92672
 Phone: 949 368 0275
 Fax: 949 368 0281

MONITORING WELLS
 CONSTRUCTION SCHEMATIC
 Thrifty Oil Co. Station #049
 3400 San Pablo Avenue, Oakland, California

FIGURE: **7**
 REVISION NO: 0
 DATE: 07/07

APPENDIX A

TABLE 1A
Historic and Recent Soil Sample Laboratory Analytical Results
 Thrifty Oil Station #049 - Oakland, CA
 GHC - 1330

Sample ID	Date Sampled	ANALYTICAL PARAMETERS					
		TPHg (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Xylenes (mg/Kg)	MTBE (mg/Kg)
<i>ESLs shallow soil (< 3m bgs)</i>		100	0.044	2.9	3.3	2.3	0.023
<i>ESLs deep soil (>3m bgs)</i>		100	0.044	2.9	3.3	2.3	0.023
MW-1	7/31/1986	ND					
MW-2	7/31/1986	ND					
MW-3(4-4.5 ft)	7/31/1986	22					
SB-1	7/31/1986	ND					
SB-2(9-9.5 ft)	7/31/1986	67					
SB-3	7/31/1986	ND					
MW-4(6.75 ft)	11/14/1986	1,200	12				
MW-5	11/14/1986						
MW-6	11/14/1986						
MW-7(6.50 ft)	11/14/1986	ND	ND				
B-1	9/11/1987						
B-2(5 ft)	9/11/1987	3,600					
B-3	9/11/1987	ND					
B-4	9/11/1987						
B-5	9/11/1987						
T-1	3/23/1998	430	3.0	<1.2	7.3	7.5	<6.2
T-2	3/23/1998	31	0.74	0.15	0.65	1.1	4.7
T-3	3/23/1998	73	0.34	<0.10	<0.10	0.56	<0.50
T-4	3/23/1998	1,600	9.3	17	22	100	27
P-1	3/23/1998	27	0.36	0.054	0.53	0.10	13
P-2	3/23/1998	1,800	3.4	3.1	11	21	6.0
P-3	3/23/1998	14	0.28	0.023	0.048	0.16	2.8
P-4	3/23/1998	3,900	19	42	53	330	22
P-5	3/23/1998	9.5	0.15	0.080	0.031	0.12	0.066
B1-5	10/6/2004	<0.401	0.0018J	<0.00042	<0.00041	<0.0008	0.097
B1-10	10/6/2004	<0.401	0.016	<0.00042	0.0023J	0.001J	0.411
B1-15	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	<0.0008	0.053
B1-20	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	<0.0008	0.019
B2-5	10/6/2004	654	<0.0195	<0.021	5.89	31.3	0.140J
B2-10	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	0.007	0.939
B2-15	10/6/2004	<0.401	<0.00039	<0.00042	0.0014J	0.0084	0.22
B2-20	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	<0.0008	0.0055
B3-10	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	0.0035J	0.609
B3-15	10/6/2004	<0.401	0.0021J	0.0061	0.0041J	0.02	1.32
B3-20	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	0.0032J	1.06
B4-5	10/6/2004	30	0.0023J	<0.00042	0.0018J	0.0035J	0.024
B4-10	10/6/2004	<0.041	<0.00039	<0.00042	<0.00041	<0.0008	1.07
B4-15	10/6/2004	<0.041	<0.00039	<0.00042	<0.00041	<0.0008	0.121
B4-20	10/6/2004	<0.401	<0.00039	<0.00042	<0.00041	<0.0008	0.42

NOTES: TPHg analyzed by EPA Method 8015M
 BTEX and MTBE analysis by EPA Method 8260B
 "<" = Less than the specified laboratory detection limit
 "J" = Trace
 * = Total Recoverable Petroleum Hydrocarbons
 = Not analyzed
 ESLs = Environmental Screening Levels
 3m bgs = 3 meters (10 feet) below ground surface

TABLE 1B
Historic and Recent Soil Sample Laboratory Analytical Results
Other Oxygenates

Thrifty Oil Station #049 - Oakland, CA
 GHC - 1330

Sample ID	Date Sampled	ANALYTICAL PARAMETERS			
		DIPE (mg/Kg)	ETBE (mg/Kg)	TAME (mg/Kg)	TBA (mg/Kg)
B1-5	10/6/2004	<0.00082	<0.00077	<0.00061	0.132
B1-10	10/6/2004	<0.00082	<0.00077	0.024	0.304
B1-15	10/6/2004	<0.00082	<0.00077	<0.00061	0.012J
B1-20	10/6/2004	<0.00082	<0.00077	<0.00061	<0.005
B2-5	10/6/2004	<0.041	<0.0385	<0.0305	<0.250
B2-10	10/6/2004	<0.00082	<0.00077	0.011	0.339
B2-15	10/6/2004	0.0016J	<0.00077	0.0011J	0.038J
B2-20	10/6/2004	<0.00082	<0.00077	<0.00061	<0.005
B3-10	10/6/2004	<0.00082	<0.00077	0.0024J	0.488
B3-15	10/6/2004	<0.00082	<0.00077	0.025	0.263
B3-20	10/6/2004	<0.00082	<0.00077	0.025	0.175
B4-5	10/6/2004	<0.00082	<0.00077	<0.00061	0.013J
B4-10	10/6/2004	<0.00082	<0.00077	0.0028J	0.496
B4-15	10/6/2004	<0.00082	<0.00077	<0.00061	0.019J
B4-20	10/6/2004	<0.00082	<0.00077	<0.00061	0.070

NOTES: Oxygenate analysis by EPA Method 8260B

"<" = Less than the specified laboratory detection limit

"J" = Trace

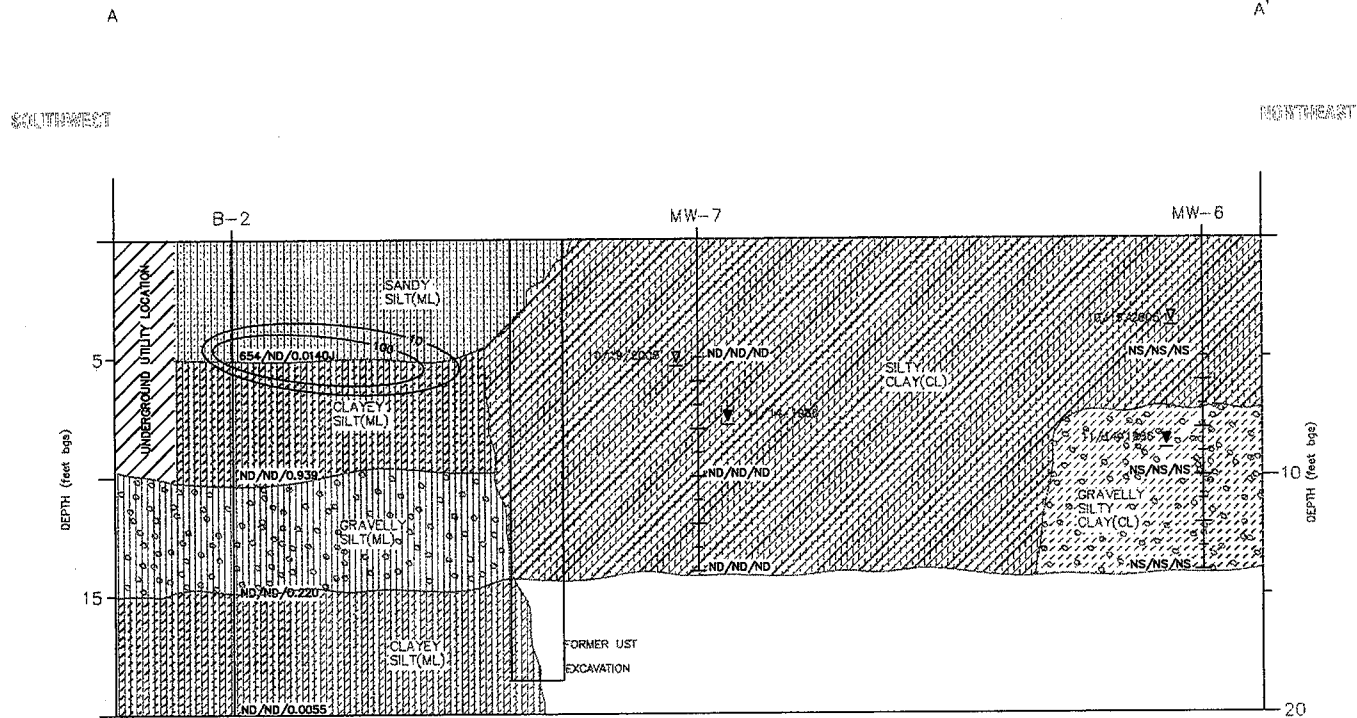
DIPE = Di IsoPropyl Ether

TAME = Tert Amyl Methyl Ether



ETBE = Ethyl Tert Butyl Ether

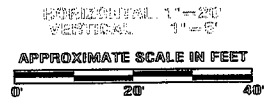
TBA = Tert Butyl Alcohol


VIEWS NORTHWEST



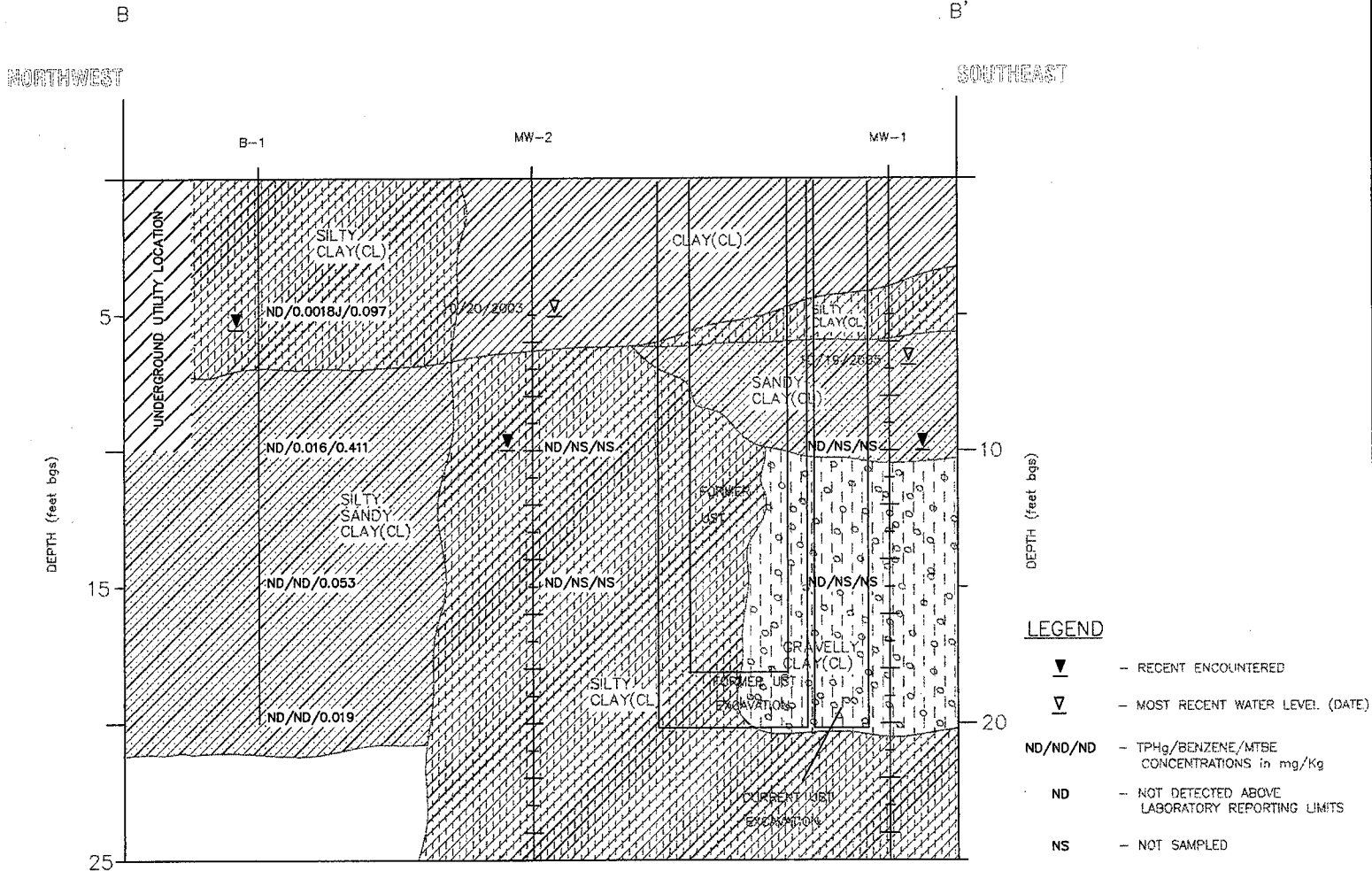
LEGEND

-  - RECENT ENCOUNTERED
-  - MOST RECENT WATER LEVEL (DATE)
- ND/ND/ND - TPHg/BENZENE/MTBE CONCENTRATIONS in mg/Kg
- ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMITS
- NS - NOT SAMPLED
- 100 — - TPHg IN SOIL CONTOUR IN mg/Kg



<p>GMC: 1330 DATE: 04/27/06</p>		<p>GEOHYDROLOGIC CONSULTANTS, INC. 5912 Bolsa Avenue, Suite 200 Huntington Beach, CA 92649 www.geohydrologic.com</p>	<p>FIGURE SA GENERAL GEOTECH SECTION A-A TRINITY SERVICE STATION #340 3400 San Pablo Avenue Oakland, CA</p>
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VIEW NORTHEAST



HORIZONTAL 1"=20'
VERTICAL 1"=5'

APPROXIMATE SCALE IN FEET



GHC: 1330

DATE: 04/27/06

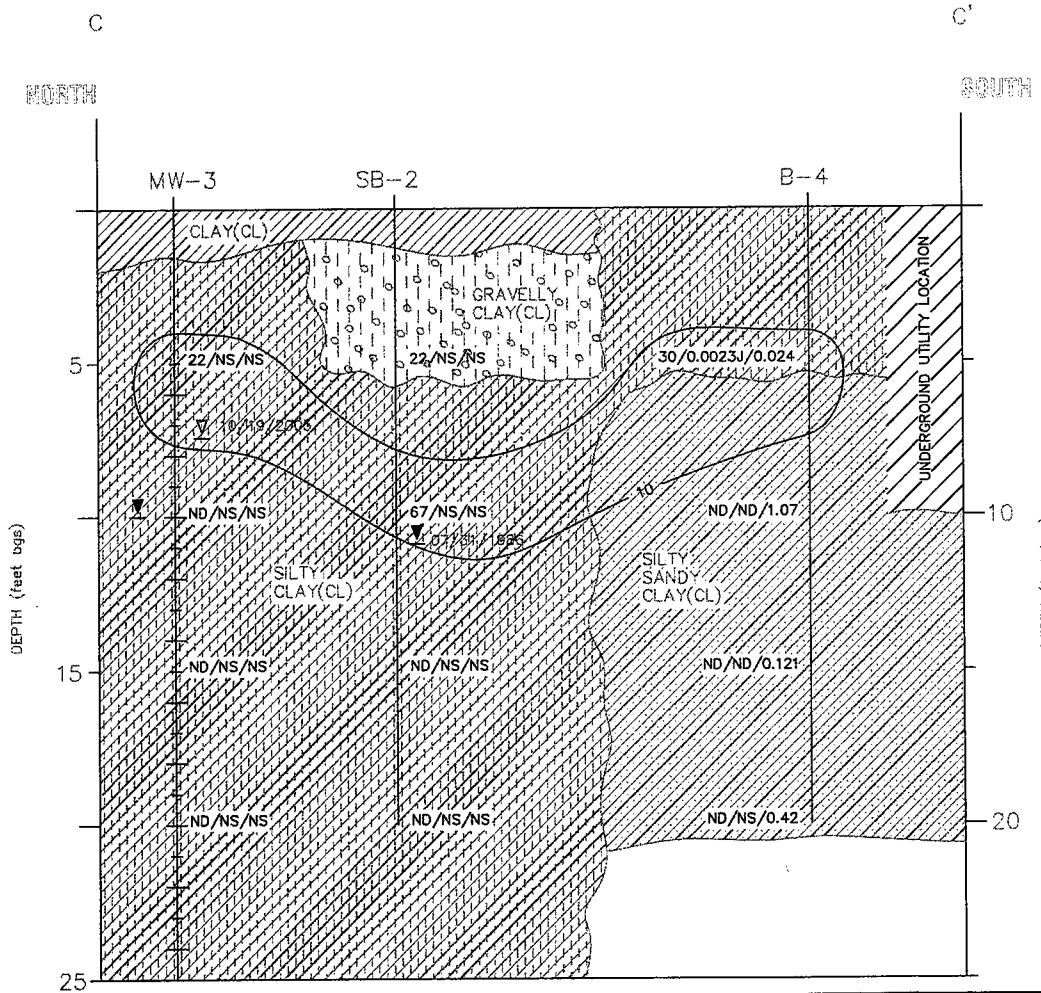


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FIGURE 36
GEOLOGIC CROSS-SECTION B-B'
THRIFTY SERVICE STATION #249
3400 San Pablo Avenue
Oakland, CA

VIEW EAST



LEGEND

- ▼ - RECENT ENCOUNTERED
- ▽ - MOST RECENT WATER LEVEL (DATE)
- ND/ND/ND - TPHg/BENZENE/MTBE CONCENTRATIONS in mg/Kg
- ND - NOT DETECTED ABOVE LABORATORY REPORTING LIMITS
- NS - NOT SAMPLED
- 10 - - TPHg IN SOIL CONTOUR IN mg/Kg

HORIZONTAL 1"=20'
VERTICAL 1"=5'



GHC: 1330
DATE: 04/27/06



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FIGURE 30
GEOLOGIC CROSS-SECTION C-C'
THRIFTY SERVICE STATION #049
6400 San Pablo Avenue
Oakland, CA