

Mr. Amir Gholami Hazardous Materials Specialist Alameda County Environmental Health Services **Environmental Protection Division** 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

June 16, 2004

Re:

arbor Bay Parkway, Sunda, CA 94502-6577

Groundwater Monitoring Report, Second Quarter, 2004

Gas Station LOP Site ID# 2118 Clearwater Project No. ZP046B USTCF Claim No. 014551

Dear Mr. Gholami:

The Clearwater Group (Clearwater) has prepared the following letter report of second quarter 2004 groundwater monitoring activities at the above referenced site. Groundwater monitoring was requested by the Alameda County Department of Environmental Health (ACDEH) in a letter dated October 18, 2001.

Site Description

The site is located in the southern portion of Oakland, Alameda County, California at the south corner of San Leandro Street and High Street, approximately 1,000 feet east of Interstate Highway 880. The site is bounded by commercial property to the southeast, southwest and northwest and by the Bay Area Rapid Transit (BART) tracks to the northeast (Figure 1.) The site is underlain predominantly by clays with some clayey gravel and clayey sand at depths to approximately 10 feet below ground surface (bgs), and silty sand below 20 feet in some areas.



Background

On April 21 and 22, 1999, Clearwater, (formerly Artesian Environmental), oversaw the removal from the site of five underground storage tanks (UST) consisting of two 6,000-gallon gasoline USTs, two 4,000-gallon diesel USTs and one 300-gallon used oil UST (**Figure 2**.) Field observations included detection of strong petroleum odors from soils near the former UST locations. A total of five-confirmation soil samples and three groundwater samples were collected from the UST excavations. Laboratory analysis confirmed an unauthorized release of petroleum had occurred.

In a letter dated May 10, 1999, the ACDEH recommended that soil be remediated by over-excavation and that "as much groundwater as possible" be pumped from the excavation. Approximately 800 tons of petroleum-impacted soil was excavated and disposed of as Class II non-hazardous waste. Less than 1,000 gallons of petroleum-impacted groundwater was pumped and removed from the excavation. Groundwater did not recharge after the initial pumping. Existing on- and off-site structures limited the amount of soil that could be safely excavated. Soil samples collected from the excavation walls and product piping trenches indicated some remaining petroleum and methyl tertiary butyl ether (MTBE) contamination.

On August 4 and 5, 1999, approximately 100 linear feet of product piping was removed. Vent piping from between the former USTs and the south corner of the on-site building was also removed. All piping was cut up and disposed of as scrap metal. On August 5, 1999, confirmation soil samples were collected along the piping trench. Six samples were collected from approximately three feet bgs. An additional four samples were collected, one for each of the four former fuel dispensers. Laboratory analytical results indicated the presence of hydrocarbon related contamination along the piping trenches.



On September 26, 2000 West Hazmat of Rancho Cordova, California, used a CME 75 drill rig to advance three borings to approximately 25 feet bgs (Figure 2), and collect soil samples. Each of the three borings was converted to a groundwater monitoring well using clean, flush-threaded, 2-inch diameter polyvinyl chloride (PVC) well materials (**Table 1**.) Soil sample analytical results are included as **Table 2**. On October 3 and 10, 2000, Clearwater surveyed the top of the casing elevations for each of the wells relative to an arbitrary datum, and developed the wells for monitoring. Initial groundwater samples collected from these wells contained 83,000 micrograms per liter (µg/L) to 250,000 µg/L total petroleum hydrocarbons as gasoline, (TPHg), and 33,000 µg/L to 400,000 µg/L MTBE (**Table 3**.)

On August 3, 2001 Clearwater submitted its *Groundwater Monitoring Report, Second Quarter 2001, Sensitive Receptor Survey and Workplan for Continuing Investigation.* It was determined at that time that there are no major ecological receptors, permanent surface waters or domestic-use wells within a 2,000-foot radius of the site. The proposed scope of the workplan included the installation of eight groundwater-monitoring wells around the site to delineate the water-borne MTBE plume. In response to Clearwater's workplan, the ACDEH, in correspondence dated October 18, 2001, recommended that off-site monitoring wells not be installed for the time being. Instead, the ACDEH requested that further characterization of subsurface soils and groundwater on-site be completed prior to the installation of any off-site wells.

Groundwater Monitoring Activities

Groundwater Gauging and Sampling

On May 17, 2004 all three wells were monitored. An electronic water level indicator accurate to within ±0.01 feet was used to gauge depth to water. All wells were checked for the presence of Separate Phase Hydrocarbons (SPH) prior to purging. SPH were not found in any well. The wells were purged of groundwater until measurements of temperature, pH and conductivity stabilized, which occurred by approximately three



wetted casing volumes. Depth to water and well purging information was recorded on Gauging Data/Purge Calculations and Purging Data sheets (Attachment 1.) All work was performed in accordance with Clearwater's Groundwater Monitoring and Sampling Field Procedures (Attachment 2.)

Purging devices were decontaminated between wells in an Alconox® wash followed by double rinsing in clean tap water to prevent cross-contamination. Purge water and rinseate were contained in labeled 55-gallons drums and removed from the site for future disposal.

Following recovery of water levels to at least 80% of their static levels, groundwater samples were collected from the monitoring wells using disposable polyethylene bailers. Samples were labeled, documented on a chain-of-custody form, and placed on ice in a cooler for transport to the project laboratory.

Laboratory Analysis

Groundwater samples were analyzed by Kiff Analytical LLC, a California Department of Health Services certified laboratory, located in Davis, California. Analyses were conducted by EPA Method 8260B for TPHg, for benzene, toluene, ethylbenzene, and xylenes (BTEX), and for the oxygenates MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). Analyses for total petroleum hydrocarbons as diesel (TPHd) were conducted by EPA Method 8015M. Complete laboratory analytical reports including chain-of-custody forms are included in **Attachment 3**.

Groundwater Monitoring Results

Groundwater Elevation and Flow

Depths to water ranged from approximately 10.92 (MW-2) to 14.68 (MW-2) feet bgs (Table 3.) Depth to water data combined with arbitrary well elevation data were used to



generate a groundwater elevation map (**Figure 3**.) During this monitoring event, groundwater flow was in a generally southerly direction with a gradient of 0.022 ft/ft. Groundwater gradient is generally consistent with observations from the previous groundwater-monitoring event. Groundwater flow for the last monitoring event was in a southeasterly direction, approximately 45 degrees to the north of this monitoring events flow direction.

Groundwater Sample Analytical Results

Diesel-range hydrocarbons were detected in samples collected from all three groundwater-monitoring wells. Concentrations of TPHd ranged from 920 μg/L (MW-3) to 5,400 μg/L (MW-1). MTBE was detected in samples collected from all three monitoring wells in concentrations ranging from 60,000 μg/L (MW-1) to 760,000 μg/L (MW-2). Detections of TAME were reported this quarter in all three wells with concentrations ranging from 260 μg/L (MW-1) to 2,500 μg/L (MW-2). Samples collected from MW-1, 2, and 3 contained reportable concentrations of TBA at a concentration of 160,000 μg/L, 13,000J μg/L and 5,600J μg/L respectively. Tert-Butanol results for samples MW-2 and MW-3 may be biased slightly high and are flagged with a "J". A fraction of MTBE (typically less than 1%) converts to Tert-Butanol during tha analysis of water samples. We consider this conversion effect to be mathematically signicant in samples that contain MTBE/Tert-Butanol in ratios of over 20:1. Samples collected from MW-2 contained reportable concentrations of benzene (860 μg/L). Laboratory analytical results are summarized in Table 3 and shown on Figure 4.

Conclusions and Recommendations

The results of the recent groundwater-monitoring event confirm the presence of elevated concentrations of petroleum related hydrocarbons in the groundwater beneath the site. Concentrations of TPHd increased in all three wells this monitoring period from the previous event. Concentrations of MTBE in MW-1 and MW-2 returned to levels more consistent with previous reports. Concentration of TBA in MW-1 doubled this



monitoring event from the previous event. Previous investigations have indicated that some contaminated soil may remain underneath existing structures. To date, the extent of the dissolved-phase contaminant plume remains undefined. Clearwater recommends that further subsurface investigations be conducted both on- and off-site in order to characterize and delineate the extent of the water-borne contaminant plume. Monitoring of the existing wells should continue throughout the investigative process.

Attachments

Figures

Figure 1:Site Location Map

Figure 2:Site Plan

Figure 3:Groundwater Elevation Map - 4/17/04 Figure 4:Dissolved Hydrocarbon Map - 4/17/04

Tables

Table 1:Well Construction Data
Table 2:Soil Sample Analytical Data

Table 3: Groundwater Elevation and Analytic Data

Attachments

Attachment 1: Well Gauging Data/Purge Calculations, Purging Data
Attachment 2: Groundwater Monitoring and Sampling Field Procedures
Attachment 3: Laboratory Analytical Reports and Chain-of-Custody Form

June 2004

Cc: Mr. Muhammad Jamil 40092 Davis Street Fremont, CA 94538

> San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400 Oakland, CA 94612



Certification

This report was prepared under the supervision of a professional Registered Geologist in the State of California. All statements, conclusions and recommendations are based solely upon published results from previous consultants, field observations by Clearwater and laboratory analyses performed by a State of California certified laboratory related to the work performed by Clearwater.

Information and interpretation presented herein are for the sole use of the client and regulating agency. The information and interpretation contained in this document should not be relied upon by a third party.

The service provided by Clearwater has been conducted in a manner consistent with the level of care and skill ordinarily exercised by members of this profession currently practicing under similar conditions in the area of the site. No other warranty, expressed or implied, is made.

Prepared by:

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Figures



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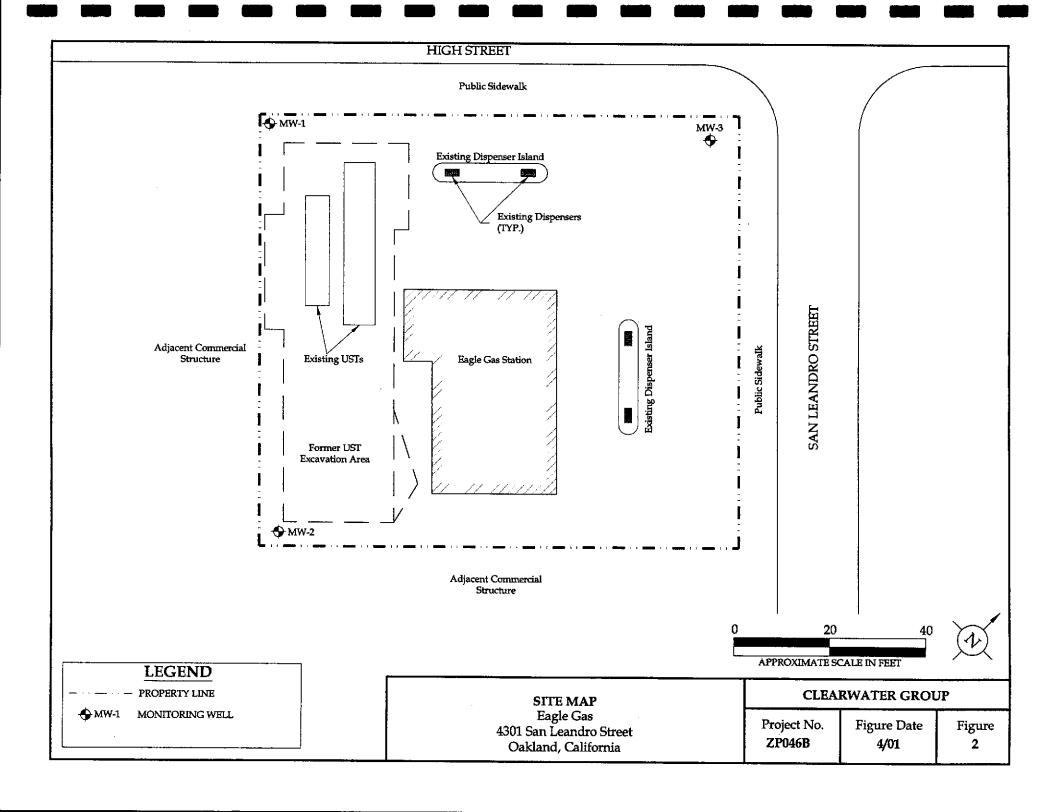


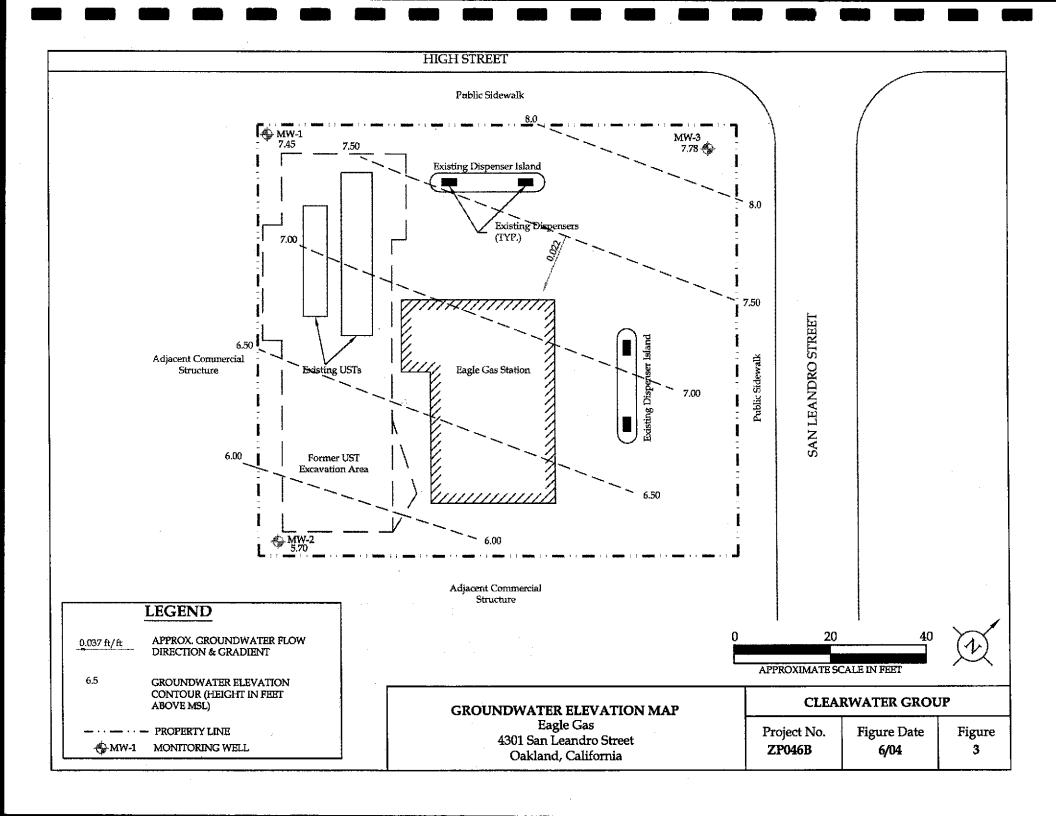
SITE LOCATION MAP

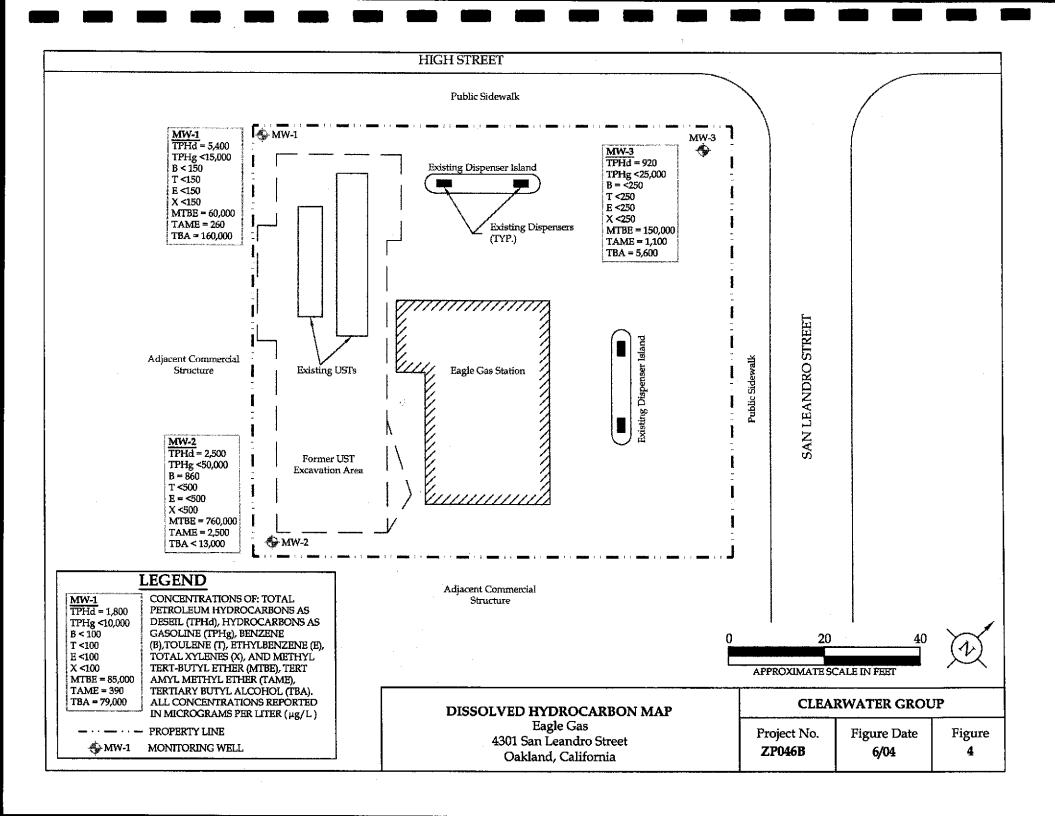
Eagle Gas 4301 San Leandro Street Oakland, California **CLEARWATER GROUP**

Project No. **ZP046B**

Figure Date 1/04 Figure 1







Tables

Table 1
WELL CONSTRUCTION DATA

Eagle Gas

4301 San Leandro Street Oakland, California Clearwater Group Project No. ZP046A

Well I.D.	Date Intstalled	Borehole Diameter (inches)	Depth of Borehole (feet)	v	Screened Interval (feet)	Filter Pack (feet)	Bentonite Seal (feet)	Cement (feet)
MW-1	9/26/00	8	25	2	10-25	6-25	3-6	0-3
MW-2	9/26/00	8	25	2	10-25	6-25	3-6	0-3
MW-3	9/26/00	8	25	2	10-25	6-25	3-6	0-3

TABLE 2
SOIL SAMPLE ANALYTICAL RESULTS
Eagle Gas
4301 San Leandro Street
Oakland, California
Clearwater Group Project No. ZP046B

Sample ID	Sample Date	TPHd mg/Kg	TPHg mg/Kg	B mg/Kg	T mg/Kg	E mg/Kg	X mg/Kg	MTBE mg/Kg	EDB mg/Kg	1,2-DCA mg/Kg	DIPE mg/Kg	ETBE mg/Kg	TAME mg/Kg	TBA mg/Kg
CS1-7	4/21/99	840	770	8.9	4.8	5.8	16	86						
CS2-7	4/21/99	1900	880	3.3	5.7	15	45	16						
CS3-7	4/22/99	780	1600	4.3	110	42	220	92						
CS5-6.5	4/22/99	33	20	0.22	1.8	0.54	3	52						
Stockpile 1	4/22/99	770	610	0.28	4.7	6.9	36	ND						
stockpile 2	4/22/99	670	480	0.23	2.3	3.9	18	ND						
CS4-13	4/22/00	ND	ND	ND	ND	ND	ND	0.08						
CS6-3	8/5/99	1300	4300	11	130	82	420	70						
CS7-3	8/5/99	200	50	ND	2.4	0.85	4	14						
CS8-3	8/5/99	3400	250	0.32	0.72	0.81	1	3.8			·			
CS9-3	8/5/99	1900	380	ND	ND	ND	ND	9.5						
CS10-3	8/5/99	350	930	ND	78	17	99	310						
CS11-3	8/5/99	5200	1400	3.2	13	25	90	62						
MW1-10'bgs	9/26/00	87	310	0.062	0.022	1.3	3.4	6,9	ND	ND	ND	ND	0.019	2.9
MW2-10'bgs	9/26/00	210	630	0.053	0.052	2	14	1.00	ND	ND	ND	ND	ND	3.5
MW3-10'bgs	9/26/00	ND	32	ND	ND	ND	ND	4.5	ND	ND	ND	ND	0.043	0.58

TABLE 2 SOIL SAMPLE ANALYTICAL RESULTS Eagle Gas

4301 San Leandro Street Oakland, California

Clearwater Group Project No. ZP046B

Sample	Sample	TPHd	TPHg	B	T	E	X	MTBE	EDB	1,2-DCA	DIPE	ETBE	TAME	TBA
ID	Date	mg/Kg	mg/Kg	_mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
NOTES: TPHd TPHg BTEX MTBE	Total petro Total petro Benzene, t Methyl tert	leum hyd oluene, e	rocarbon: thylbenze	s as gaso ene, total	line by El xylenes b	PA Method by EPA Me	1 8260B	,						

DIPE Di-isopropyl ether by EPA Method 8260B
ETBE Ethyl tertary butyl ether by EPA Method 8260B
TAME Tertiary amyl methyl ether by EPA Method 8260B

1,2-DCA 1,2-Dichloroethane by EPA Method 8260B
EDB Ethylene dibromide by EPA Method 8260B
TBA Tertiary butyl alcohol by EPA Method 8260B

mg/Kg miligrams per kilogram

--- no samples collected, no data available

ND Not detected in concentrations above laboratory reporting limit

TABLE 3 GROUNDWATER ELEVATIONS AND SAMPLE ANALYTICAL RESULTS

Eagle Gas

4301 San Leandro Street

Oakland, California

Clearwater Group Project No. ZP046B

Sample	Sample	TOC	DTW	GWE	TPHd	TPHg	В	Т	E	Χ	MTBE	DIPE	ETBE	TAME	TBA
ID	Date	(feet)	(feet)	(feet)	(µg/L)	(µg/L)	$(\mu g/L)$	(µg/L)	$(\mu g/L)$	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(μg/L)	(µg/L)
MW-1	10/3/00	18.37	8.96	9,41	460	02.000	-E00	-E00	-E00	4E00	100.000	-10.000	-10.000	-10.000	-0.000
19199-1	10/27/00	18.37	0.90 7.27	9.41		93,000	<500	<500	<500	<500	130,000	<10,000	<10,000	<10,000	<2,000
	1/26/01	18.37	7.60	10.77	1,600*	51,000	 270	<100	<100	<100	77,000	 <5,000	<5,000	<5,000	<20.000
	5/8/01	18.37	7.50	10.77	470*	36,000*	<100	<100	<100	<100	15,000	<5,000	<5,000 <5,000	<5,000 <5,000	<20,000
	8/3/01	18.37	7.09	11.28	2,200*	19,000*	<50	59	<50	<50	96,000	<5,000	<5,000 <5,000	<5,000	<20,000
	7/1/03	18.37	7.59	10.78	3,000	<25,000	<250	<250	<250	<250	170,000	<250	<250	980	8700
	10/1/03	18.37	8.36	10.01	2,600	<20,000	<200	<200	<200	<200	69,000	<200	<200	270	15,000
	2/13/04	18.37	8.80	9.57	1,800	<10,000	<100	<100	<100	<100	85,000	<100	<100	390	79,000
	5/17/04	18.37	10.92	7.45	5,400	<15,000	<150	<150	<150	<150	60,000	<150	<150	260	160,000
NA)A/ O	10/0/00	00.00	00.06	0.00	240	050.000	-4 OEO	4.050	4.050	4.050	400.000	OF 000	-DE 000	-OE 000	400.000
MW-2	10/3/00 10/27/00	20.28 20.28	20.26 13.88	0.02 6.40	210	250,000	<1,250	•	<1,250	•	400,000	<25,000	<25,000	<25,000	<100,000
	1/26/01				 C 000*	740.000		.E00	0.45	4 600	4 000 000	 	 	 	
	5/8/01	20.28 20.28	12.10 12.05	8.18 8.23	6,000* 2,100*	740,000 140,000	3,800 2,800	<500 <250	940 780	1,600	1,000,000 840,000	<50,000 <50,000	<50,000	<50,000 <50,000	<200,000 <200,000
	8/3/01	20.28	13.30	6.98	2,100 2,600*	42,000*	2,000 1,100	<230 63	230	640 130	880,000	<25,000	<50,000 <25,000	<50,000 <25,000	<100,000
	7/1/03	20.28	14.98	5.30	2,200	<200,000	<2,000	<2,000			790,000	,	•	•	
	10/1/03		15.99		•	•	,	•	,	•	•	<2,000	<2,000	3,400	<20,000
		20.28		4.29	870	<100,000	<1,000	<1,000		•	620,000	<1,000	<1,000	2,700	<20,000
	2/13/04	20.28	13.88	6.40	1200	<20,000	860	<200	260	<200	710,000	<200	<200	2,000	<25,000
	5/17/04	20.38	14.68	5.70	2,500	<50000	860	<500	<500	<500	760,000	<500	<500	2,500	13000J
MW-3	10/3/00	18.98			120	8,300	<500	<500	<500	<500	33,000	<2,500	<2,500	<2,500	<10,000
	10/27/00	18.98	18.75	0.23		~									
	1/26/01	18.98	13.38	5.60	900*	230,000	930	<500	<500	<500	330,000	<25,000	<25,000	<25,000	<100,000
	5/8/01	18.98	11.82	7.16	1,100*	95,000	840	<250	<250	<250	390,000	<12,500	<12,500	<12,500	<50,000
	8/3/01	18.98	13.44	5.54	290*	30,000*	<50	51	<50	<50	270,000	<12,500	<12,500	<12,500	<50,000
	7/1/03	18.98	12.67	6.31	620	<50,000	<500	<500	<500	<500	230,000	<500	<500	1,800	<5,000

TABLE 3 GROUNDWATER ELEVATIONS AND SAMPLE ANALYTICAL RESULTS

Eagle Gas

4301 San Leandro Street

Oakland, California

Clearwater Group Project No. ZP046B

Sample	Sample	TOC	DTW	GWE	TPHd	TPHg	В	Т	Ε	Χ	MTBE	DIPE	ETBE	TAME	TBA
ID	Date	(feet)	(feet)	(feet)	$(\mu g/L)$	$(\mu g/L)$	(µg/L)	$(\mu g/L)$	(µg/L)	(µg/L)	$(\mu g/L)$				
	10/1/03	18.98	14.04	4.94	370	<20,000	<200	<200	<200	<200	120,000	<200	<200	1,200	<5,000
	2/13/04	19.98	12.20	7.78	430	<20,000	280	<200	<200	<200	210,000	<200	<200	1,200	<5000
	5/17/04	19.98	11.87	8.11	920	<25,000	<250	<250	<250	<250	150,000	<250	<250	1,100	5600J

NOTES:

TOC	Top of well casing refe	renced to arbitrary datum
	TOP OF WELL DESILIES FOR	cheed to arbitrary daturn

DTW Depth to water

GWE Groundwater elevation

TPHd Total petroleum hydrocarbons as diesel by EPA Method 8015 (modified)

TPHg Total petroleum hydrocarbons as gasoline by EPA Method 8260B

BTEX Benzene, toluene, ethylbenzene, total xylenes by EPA Method 8260B

MTBE Methyl tertiary butyl ether by EPA Method 8260B

DIPE Di-isopropyl ether by EPA Method 8260B

ETBE Ethyl tertary butyl ether by EPA Method 8260B

TAME Tertiary amyl methyl ether by EPA Method 8260B

TBA Tertiary butyl alcohol by EPA Method 8260B

 $(\mu g/L)$ Micrograms per liter

<# Not detected in concentrations above laboratory reporting limit</p>

--- no samples collected, no data available

* Laboratory note: "Results within quantitation range; chromatographic pattern not typical of fuel"

Attachments

	WELL GAU	GING/PURGIN	G CALCULATIONS
CLEARWATER		DATA SHEET	1
GROUP	Date Job No.	Location / 1/2/	JAN LEINDROS
229 Tewksbury Ave, Point Richmond, CA 94801 Phone: (510)307-9943 Fax: (510) 232-2823	517 ZPaya	Drums on Site @ 1	nd CA
Tech(s): Drums on Site	@TOA //	Drums on Site &	1 2
RDDULY BLERY Soil: O	Water: DQ)	Soil:	Water: /2 DRVM
Well No Diameter DTB DTW (in) (ft) (ft)	ST CV (ft) (gal)	1 - 1	PL / Notes t)
mw-1 24,52 10,9	13.6 2.1	16.52	
mus 2 24.78 14.6	8 10,1 1,61	9.89	
Aus - siste	11-10-		
	.,		
	· ·		

Explanation:

DTB = Depth to Bottom

DTW = Depth to Water

ST = Saturated Thickness (DTB-DTW)

CV = Casing Volume (ST x cf)

PV = Purge Volume (standard 3 x CV, well development 10 x CV)

SPL = Thickness of Separate Phase Liquid

Conversion Factors (cf)

2-inch diameter well cf=0.16 gal/ft 4-inch diameter well cf=0.65 gal/ft

6-inch diameter well cf=1.44 gal/ft

		× *				•
			PUI	RGING	DATA	SHEET OF
4.			4301	SAN LE	and the	5/17/04 Tech: RODNAY TORRY
Job No.: 4	ZPN46E	Location:	CAN	aND.	Date:	5/17/04 Tech: RODNIY 15001
<u> </u>						The state of the s
WELL	TIME	VOLUME		TEMP.	pН	1145
No.		(gal.)	(mS/cm)	(deg. F.)	1.77	TO TAL
mW-1	11122		1390	167.1	616	Sample for: SPA 8015/h
Calc. purge	11127	2	1350	671	193	(TDHa) / TDHA) 8010
Carc. purge	1101	1-3-	1000	151	7 70	00 80(DI
volume	1132	6,50	1389	641	KD Y 101	FBTEX Other SOXYS CAN VABIL
6.52	,]			Purging Method:
						PVC bailer) Pump
± '	COLORNI	TS: color, tu	ehiditer earl	azen ehene		Sampling Method:
	COMMEN	15: color, to	rolarty, reci	large, siteer	12.	
	CIZHK	-, low, G	<u>000) 111</u>	SUR, S	MEEL	Dedicated / Disposable bailer
TATES I	TIME	VOLUME	COND.	TEMP.	pН	1211
WELL No.	THVIE	(gal.)	(mS/cm)	(deg. F.)	pm	1215
<u> </u>	1117		711	JUD	1702	Sample for:
1/1W-3	1100	 	117	17/10	1	E17 00101
Calc. purge	11203	3_	72.7	13.0	7.00	TPHg TPHd 8010
volume 🛶 🙀	1208	5.4C	618	725	7.02	BTEX Other 5 0X45 EM 82601
240			<u> </u>			Purging Method:
					,	PVC bailer / Pump
	COMMEN	IS: color, tu	rhidity rech	arge sheen	i	Sampling Method:
**************************************	PA CONTINUE				-1	
:		R/100	J. 9 00)	D,NO 3	KEEN	Dedicated / Disposable bailer
WELL	TIME	/ VOLUME	COND.	TEMP.	рН	10117
No.	THVIS	(gal.)	(mS/cm)	(deg. F.)	P	1245
M12-2	1223	Ď	1554	129	10/2	Sample for: ON (D) (M)
		<u></u>	1328	603	103	SPA WISH
Calc. purge	1227	2	132	08,3	2,×, 3	TPHg TPHd 8010
volume	リンプ	4.84	1330	61.4	6.844	BTEX) Other 5 OX45 EPA 826013
4,84				•		Purging Method:
U					7)
		<u></u>			·	PVC bailer / Pump
1	COMMENT	S: color, tur		^ 1		Sampling Method:
	CLEAK	2,1000	DOOR	No de	EN ON	Dedicated Disposable bailer
		1	カーナ		/	

CLEARWATER GROUP, 229 Tewksbury Ave., Point Richmond, California 94801

Phone: 510-307-9943 Fax: 510-232-2823

CLEARWATER GROUP

Groundwater Monitoring and Sampling Field Procedures

Groundwater Monitoring

Prior to beginning, a decontamination area is established. Decontamination procedures consist of scrubbing downhole equipment in an Alconox® solution wash (wash solution is pumped through any purging pumps used), and rinsing in a first rinse of potable water and a second rinse of potable water or deionized water if the latter is required. Any non-dedicated down hole equipment is decontaminated prior to use.

Prior to purging and sampling a well, the static water level is measured to the nearest 0.01 feet with an electronic water sounder. Depth to bottom is typically measured once per year, at the request of the project manager, and during Clearwater's first visit to a site. If historical analytical data are not available, with which to establish a reliable order of increasing well contamination, the water sounder and tape will be decontaminated between each well. If floating separate-phase hydrocarbons (SPH) are suspected or observed, SPH is collected using a clear, open-ended product bailer, and the thickness is measured to the nearest 0.01 feet in the bailer. SPH may alternatively be measured with an electronic interface probe. Any monitoring well containing a measurable thickness of SPH before or during purging is not additionally purged and no sample is collected from that well. Wells containing a hydrocarbon sheen are sampled unless otherwise specified by the project manager. Field observations such as well integrity as well as water level measurements and floating product thicknesses are noted on the Gauging Data/Purge Calculations form.

Well Purging

Each monitoring well to be sampled is purged using either a PVC bailer or a submersible pump. Physical parameters (pH, temperature and conductivity) of the purge water are monitored during purging activities to assess if the water sample collected is representative of the aquifer. If required, parameters such as dissolved oxygen, turbidity, salinity etc. are also measured. Samples are considered representative if parameter stability is achieved. Stability is defined as a change of less than 0.25 pH units, less than 10% change in conductivity in micro mhos, and less than 1.0 degree centigrade (1.8 degrees Fahrenheit) change in temperature. Parameters are measured in a discreet sample decanted from the bailer separately from the rest of the purge water. Parameters are measured at least four times during purging; initially, and at volume intervals of one well volume. Purging continues until three well casing volumes have been removed or until the well completely dewaters. Wells which dewater or demonstrate a slow recharge, may be sampled after fewer than three well volumes have been removed. Well purging information is recorded on the Purge Data sheet. All meters used to measure parameters are calibrated daily. Purge water is sealed, labeled, and stored on site in D.O.T.-approved 55-gallon drums. After being chemically profiled, the water is removed to an appropriate disposal facility by a licensed waste hauler.

Groundwater Sample Collection

Groundwater samples are collected immediately after purging or, if purging rate exceeds well recharge rate, when the well has recharged to at least 80% of its static water level. If recharge is extremely slow, the well is allowed to recharge for at least two hours, if practicable, or until sufficient volume has accumulated for sampling. The well is sampled within 24 hours of purging or repurged. Samples are collected using polyethylene bailers, either disposable or dedicated to the well. Samples being analyzed for compounds most sensitive to volatilization are collected first. Water samples are placed in appropriate laboratory-supplied containers, labeled, documented on a chain of custody form and placed on ice in a cooler for transport to a state-certified analytical laboratory. Analytical detection limits match or surpass standards required by relevant local or regional guidelines.

Quality Assurance Procedures

To prevent contamination of the samples, Clearwater personnel adhere to the following procedures in the field:

- A new, clean pair of latex gloves are put on prior to sampling each well.
- Wells are gauged, purged and groundwater samples are collected in the expected order of increasing degree of contamination based on historical analytical results.

- All purging equipment will be thoroughly decontaminated between each well, using the procedures previously
 described at the beginning of this section.
- During sample collection for volatile organic analysis, the amount of air passing through the sample is minimized. This helps prevent the air from stripping the volatiles from the water. Sample bottles are filled by slowly running the sample down the side of the bottle until there is a convex meniscus over the mouth of the bottle. The lid is carefully screwed onto the bottle such that no air bubbles are present within the bottle. If a bubble is present, the cap is removed and additional water is added to the sample container. After resealing the sample container, if bubbles still are present inside, the sample container is discarded and the procedure is repeated with a new container.

Laboratory and field handling procedures may be monitored, if required by the client or regulators, by including quality control (QC) samples for analysis with the groundwater samples. Examples of different types of QC samples are as follows:

- Trip blanks are prepared at the analytical laboratory by laboratory personnel to check field handling procedures.
 Trip blanks are transported to the project site in the same manner as the laboratory-supplied sample containers to be filled. They are not opened, and are returned to the laboratory with the samples collected. Trip blanks are analyzed for purgable organic compounds.
- Equipment blanks are prepared in the field to determine if decontamination of field sampling equipment has
 been effective. The sampling equipment used to collect the groundwater samples is rinsed with distilled water
 which is then decanted into laboratory-supplied containers. The equipment blanks are transported to the
 laboratory, and are analyzed for the same chemical constituents as the samples collected at the site.
- Duplicates are collected at the same time that the standard groundwater samples are being collected and are
 analyzed for the same compounds in order to check the reproducibility of laboratory data. They are typically
 only collected from one well per sampling event. The duplicate is assigned an identification number that will
 not associate it with the source well.

Generally, trip blanks and field blanks check field handling and transportation procedures. Duplicates check laboratory procedures. The configuration of QC samples is determined by Clearwater depending on site conditions and regulatory requirements.



Date: 5/26/2004

Jessica Chiaro Clearwater Group, Inc 229 Tewksbury Avenue Point Richmond, CA 94801

Subject: 3 Water Samples

Project Name: NAZ EAGLE GAS

Project Number: ZP046B

Dear Ms. Chiaro,

Chemical analysis of the samples referenced above has been completed. Summaries of the data are contained on the following pages. Sample(s) were received under documented chain-of-custody. US EPA protocols for sample storage and preservation were followed.

Kiff Analytical is certified by the State of California (# 2236). If you have any questions regarding procedures or results, please call me at 530-297-4800.

Sincerely,



Date: 5/26/2004

Subject : Project Name :

3 Water Samples NAZ EAGLE GAS

Project Number :

ZP046B

Case Narrative

Tert-Butanol results for samples MW-2 and MW-3 may be biased slightly high and are flagged with a 'J'. A fraction of MtBE (typically less than 1%) converts to Tert-Butanol during the analysis of water samples. We consider this conversion effect to be mathematically significant in samples that contain MtBE/Tert-Butanol in ratios of over 20:1.

Approved By:

Jde Kiff



Date: 5/26/2004

Project Name: NAZ EAGLE GAS

Project Number: ZP046B

Sample: MW-1

Matrix: Water

Lab Number: 38365-01

Sample Date :5/17/2004

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	< 150	150	ug/L	EPA 8260B	5/22/2004
Toluene	< 150	150	ug/L	EPA 8260B	5/22/2004
Ethylbenzene	< 150	150	ug/L	EPA 8260B	5/22/2004
Total Xylenes	< 150	150	ug/L	EPA 8260B	5/22/2004
Methyl-t-butyl ether (MTBE)	60000	150	ug/L	EPA 8260B	5/22/2004
Diisopropyl ether (DIPE)	< 150	150	ug/L	EPA 8260B	5/22/2004
Ethyl-t-butyl ether (ETBE)	< 150	150	ug/L	EPA 8260B	5/22/2004
Tert-amyl methyl ether (TAME)	260	150	ug/L	EPA 8260B	5/22/2004
Tert-Butanol	160000	700	ug/L	EPA 8260B	5/22/2004
TPH as Gasoline	< 15000	15000	ug/L	EPA 8260B	5/22/2004
Toluene - d8 (Surr)	95.8		% Recovery	EPA 8260B	5/22/2004
4-Bromofluorobenzene (Surr)	97.5		% Recovery	EPA 8260B	5/22/2004
TPH as Diesel	5400	50	ug/L	M EPA 8015	5/25/2004
Octacosane (Diesel Surrogate)	97.4		% Recovery	M EPA 8015	5/25/2004

Approved By:

Joel Kiff

2795 2nd St., Suite 300 Davis, CA 95616 530-297-4800



Date: 5/26/2004

Project Name: NAZ EAGLE GAS

Project Number: ZP046B

Sample: MW-2

Matrix: Water

Lab Number : 38365-02

Sample Date :5/17/2004

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	860	500	ug/L	EPA 8260B	5/22/2004
Toluene	< 500	500	ug/L	EPA 8260B	5/22/2004
Ethylbenzene	< 500	500	ug/L	EPA 8260B	5/22/2004
Total Xylenes	< 500	500	ug/L	EPA 8260B	5/22/2004
Methyl-t-butyl ether (MTBE)	760000	2000	ug/L	EPA 8260B	5/24/2004
Diisopropyl ether (DIPE)	< 500	500	ug/L	EPA 8260B	5/22/2004
Ethyl-t-butyl ether (ETBE)	< 500	500	ug/L	EPA 8260B	5/22/2004
Tert-amyl methyl ether (TAME)	2500	500	ug/L	EPA 8260B	5/22/2004
Tert-Butanol	13000 J	2500	ug/L	EPA 8260B	5/22/2004
TPH as Gasoline	< 50000	50000	ug/L	EPA 8260B	5/22/2004
Toluene - d8 (Surr)	95.2		% Recovery	EPA 8260B	5/22/2004
4-Bromofluorobenzene (Surr)	98.2		% Recovery	EPA 8260B	5/22/2004
TPH as Diesel	2500	50	ug/L	M EPA 8015	5/25/2004
Octacosane (Diesel Surrogate)	108		% Recovery	M EPA 8015	5/25/2004

Approved By:

Joel Kiff

2795 2nd St., Suite 300 Davis, CA 95616 530-297-4800



Date: 5/26/2004

Project Name: NAZ EAGLE GAS

Project Number: ZP046B

Sample: MW-3

Matrix: Water

Lab Number : 38365-03

Sample Date:5/13	7/2004
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Sample Date :5/17/2004		Method			
Parameter	Measured Value	Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	< 250	250	ug/L	EPA 8260B	5/22/2004
Toluene	< 250	250	ug/L	EPA 8260B	5/22/2004
Ethylbenzene	< 250	250	ug/L	EPA 8260B	5/22/2004
Total Xylenes	< 250	250	ug/L	EPA 8260B	5/22/2004
Methyl-t-butyl ether (MTBE)	150000	250	ug/L	EPA 8260B	5/22/2004
Diisopropyl ether (DIPE)	< 250	250	ug/L	EPA 8260B	5/22/2004
Ethyl-t-butyl ether (ETBE)	< 250	250	ug/L	EPA 8260B	5/22/2004
Tert-amyl methyl ether (TAME)	1100	250	ug/L	EPA 8260B	5/22/2004
Tert-Butanol	5600 J	1500	ug/L	EPA 8260B	5/22/2004
TPH as Gasoline	< 25000	25000	ug/L	EPA 8260B	5/22/2004
Toluene - d8 (Surr)	95.6		% Recovery	EPA 8260B	5/22/2004
4-Bromofluorobenzene (Surr)	97.2		% Recovery	EPA 8260B	5/22/2004
TPH as Diesel	920	50	ug/L	M EPA 8015	5/25/2004
Octacosane (Diesel Surrogate)	1 1 1		% Recovery	M EPA 8015	5/25/2004

Approved By:

Joel Kiff

2795 2nd St., Suite 300 Davis, CA 95616 530-297-4800

Date: 5/26/2004

QC Report : Method Blank Data

Project Name: NAZ EAGLE GAS

Project Number: **ZP046B**

Parameter	Measured Value	Method Reportin Limit	g Units	Analysis Method	Date Analyzed		
FPH as Diesel	< 50	50	ug/L	M EPA 8015	5/22/2004		
Octacosane (Diesel Surrogate)	89.0		%	M EPA 8015	5/22/2004		
Benzene	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Foluene	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Fert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	5/24/2004		
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	5/24/2004		
PH as Gasoline	< 50	50	ug/L	EPA 8260B	5/24/2004		
Гоfuene - d8 (Surr)	101		%	EPA 8260B	5/24/2004		
-Bromofluorobenzene (Suπ)	99.7		%	EPA 8260B	5/24/2004		
Benzene	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
oluene	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
otal Xylenes	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
fethyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
thyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
ert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	5/21/2004		
ert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	5/21/2004		
PH as Gasoline	< 50	50	ug/L	EPA 8260B	5/21/2004		
oluene - d8 (Surr)	94.5		%	EPA 8260B	5/21/2004		
				–			

Measured Reporting Analysis Date
Parameter Value Limit Units Method Analyzed

Approved By:

Joel Kiff

2795 2nd St, Suite 300 Davis, CA 95616 530-297-4800

KIFF ANALYTICAL, LLC

Date: 5/26/2004

Project Name: NAZ EAGLE GAS

QC Report : Matrix Spike/ Matrix Spike Duplicate

Project Number: **ZP046B**

Parameter	Spiked Sample	Sample Value	Spike Level	Spike Dup. Level	Spiked Sample Value	Duplicate Spiked Sample Value	Units	Analysis Method	Date Analyzed	Spiked Sample Percent Recov.	Duplicat Spiked Sample Percent Recov.	·	Spiked Sample Percent Recov. Limit	Relative Percent Diff. Limit
TPH as Diesel	Blank	<50	1000	1000	924	890	ug/L	M EPA 8015	5/22/04	92.4	89.0	3.74	70-130	25
Benzene	38404-02	<0.50	40.0	40.0	37.6	36.6	ug/L	EPA 8260B	5/24/04	93.9	91.6	2.44	70-130	25
Toluene	38404-02	<0.50	40.0	40.0	37.4	37.2	ug/L	EPA 8260B	5/24/04	93.4	93.1	0.288	70-130	25
Tert-Butanol	38404-02	<5.0	200	200	184	185	ug/L	EPA 8260B	5/24/04	92.1	92.6	0.538	70-130	25
Methyi-t-Butyi Ethe	er 38404-02	<0.50	40.0	40.0	39.7	40.0	ug/L	EPA 8260B	5/24/04	99.2	99.9	0.724	70-130	25
Benzene	38392-03	<0.50	40.0	40.0	41.9	41.4	ug/L	EPA 8260B	5/21/04	105	104	1.12	70-130	25
Toluene	38392-03	<0.50	40.0	40.0	39.0	38.0	ug/L	EPA 8260B	5/21/04	97.5	95.1	2.49	70-130	25
Tert-Butanol	38392-03	5.3	200	200	215	213	ug/L	EPA 8260B	5/21/04	105	104	0.864	70-130	25
Methyl-t-Butyl Ethe	r 38392-03	<0.50	40.0	40.0	42.7	42.7	ug/L	EPA 8260B	5/21/04	107	107	0.120	70-130	25

Approved By: Joe Kiff

KIFF ANALYTICAL, LLC

2795 2nd St, Suite 300 Davis, CA 95616 530-297-4800

Date: 5/26/2004

Project Name : NAZ EAGLE GAS

QC Report : Laboratory Control Sample (LCS)

Project Number: **ZP046B**

Parameter	Spike Level	Units	Analysis Method	Date Analyzed	LCS Percent Recov.	LCS Percent Recov. Limit
Benzene	40.0	ug/L	EPA 8260B	5/24/04	93.3	70-130
Toluene	40.0	ug/L	EPA 8260B	5/24/04	94.7	70-130
Tert-Butanol	200	ug/L	EPA 8260B	5/24/04	92.7	70-130
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	5/24/04	99.8	70-130
Benzene	40.0	ug/L	EPA 8260B	5/21/04	104	70-130
Toluene	40.0	ug/L	EPA 8260B	5/21/04	97.6	70-130
Tert-Butanol	200	ug/L	EPA 8260B	5/21/04	101	70-130
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	5/21/04	106	70-130

Approved By:

Joel Kif

KIFF ANALYTICAL, LLC

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