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Alameda County Environmental Health

Mr. Jerry Wickham

Hazardous Materials Specialist

Alameda County Health Care Services Agency

Environmental Health Services

Environmental Protection

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502

RE:

Eagle Gas Station

4301 San Leandro Street

Oakland, California 94601

LOP StID# 2118

Fuel Leak Case No. RO0000096

USTCF Claim No. 014551

Clearwater Group Project # ZP046I

Dear Mr. Wickham,

As the legally authorized representative of the above-referenced project location, I have reviewed the *Quarterly Groundwater Monitoring Report - Third Quarter 2007* prepared by my consultant of record, Clearwater Group. I declare, under penalty of perjury, that the information and/or recommendations contained in this report are true and correct to the best of my knowledge.

Sincerely,

Mr. Muhammad Jamil

Muhamid Temp

Date: 10-24-07



October 12, 2007

Mr. Jerry Wickham, P.G. Hazardous Materials Specialist Alameda County Environmental Health Services Environmental Protection Division 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Quarterly Groundwater Monitoring Report - Third Quarter 2007

Eagle Gas Station, 4301 San Leandro Street
Oakland, California 94601
LOP Site ID# 2118
USTCF Claim No. 014551
Clearwater Project No. ZP046I

Dear Mr. Wickham:

Clearwater Group (Clearwater) has prepared this Third Quarter 2007 Groundwater Monitoring Report for the Eagle Gas Station site. This report presents the groundwater monitoring activities and associated results. The groundwater monitoring was performed on August 15 and 16, 2007.

SITE DESCRIPTION

The site is located in the southern portion of the City of Oakland, Alameda County, California, at the southern corner of the intersection of San Leandro Street and High Street. The site is located approximately 1,100 feet east of Interstate Highway 880 (Figure 1). The site is bounded by commercial property to the southeast and southwest, by High Street to the northwest, and by San Leandro Street to the northeast (Figure 2). The site is operated as a gas station and convenience store.

BACKGROUND

On April 21 and 22, 1999, Clearwater (formerly Artesian Environmental) oversaw the removal of five underground storage tanks (USTs) consisting of two 6,000-gallon gasoline tanks, two 4,000-gallon diesel tanks, and one 300-gallon used-oil tank from the site. Strong petroleum



hydrocarbon odors were reportedly observed emanating from the excavation pit of the USTs. Five soil samples and three groundwater samples were collected from the UST excavation for confirmation sampling after completion of the UST excavation. Field observations and laboratory analysis indicated that an unauthorized release of petroleum hydrocarbons had occurred. The former UST excavation is shown in **Figure 2** and was defined by driven steel shoring installed to protect the on-site and off-site buildings prior to the field activities.

In a letter dated May 10, 1999, Alameda County Environmental Health Services (ACEH) staff recommended that the soil at the site be remediated by over-excavation and that "as much groundwater as possible" be pumped from the excavation. Approximately 800 tons of petroleum hydrocarbon-impacted soil were excavated and disposed of as Class II non-hazardous waste, and approximately 1,000 gallons of petroleum hydrocarbon-impacted groundwater was pumped and removed from the site. Groundwater did not recharge quickly after the initial pumping. Existing on- and off-site structures and associated shoring limited the amount of soil that could be safely excavated. Soil samples collected from the excavation walls and product-piping trenches indicated that residual concentrations of petroleum hydrocarbons and methyl-tert-butyl-ether (MTBE) remained.

On August 4 and 5, 1999, approximately 100 linear feet of product piping was removed. Vent piping from between the former USTs and the southern corner of the on-site building was also removed. All piping was cut up and disposed of as scrap metal. On August 5, 1999, six confirmation soil samples were collected along the piping trench approximately 3 feet below ground surface (bgs). In addition, one soil sample was collected from each of the four former fuel dispensers. Laboratory analytical results indicated that petroleum hydrocarbon impacts remained 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 and collect soil samples. The three borings were completed as groundwater-monitoring wells (**Figure 2**) using clean, flush-threaded, 2-inch diameter polyvinyl chloride (PVC) for the well casing. The construction data for these three wells are presented in **Table 1**.

On October 3 and 10, 2000, Clearwater surveyed the top-of-the-casing (TOC) elevation of each of the wells relative to an arbitrary datum and developed the wells for monitoring purposes. Initial groundwater samples collected from these wells contained 83,000 micrograms per liter (μ g/L) to 250,000 μ g/L total petroleum hydrocarbon as gasoline (TPH-g) and 33,000 μ g/L to 400,000 μ g/L MTBE.

On August 3, 2001, Clearwater submitted its Groundwater Monitoring Report—Second Quarter 2001 and Sensitive Receptor Survey and Workplan for Continuing Investigation. It was determined, at that time, that there were 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 MTBE plume in groundwater. In response to Clearwater's workplan, ACEH staff, in correspondence dated October 18, 2001, recommended postponing the installation of the additional off-site wells. Instead, ACEH staff requested that further characterization of subsurface soils and groundwater on the subject site be completed prior to the installation of any off-site wells.

Quarterly monitoring was suspended after the Third Quarter 2001 event on August 3, 2001. Quarterly monitoring resumed in July 2003 and has since continued. The historical groundwater elevation and analytical results are listed in **Table 2**.

On January 9, 2004, after completing the review of the *Third Quarter 2003 Groundwater Monitoring Report*, ACEH staff requested a workplan that included additional on-site and offsite subsurface investigations to address the extent of groundwater impacts on the site. Clearwater submitted its *Interim Remedial Action Plan* (IRAP), as requested by ACEH staff, on January 14, 2004.

ACEH staff provided review comments for the IRAP and the First Quarter 2005 Groundwater Monitoring Report in a letter dated May 26, 2005. Pursuant to the ACEH request described in this letter, Clearwater submitted a Soil and Groundwater Investigation Workplan on August 10, 2005. In review letters dated September 21, 2005, and November 1, 2005, ACEH approved the implementation of a modified IRAP proposed in Clearwater's June 13, 2005, letter entitled Recommendations for Interim Remedial Actions and the August 10, 2005, Soil and Groundwater Investigation Workplan. On the basis of the above-mentioned documents and correspondences, Clearwater installed 15 additional on-site wells between December 15 and December 20, 2005, and conducted Geoprobe soil sampling from December 6 to December 9, 2005, and from March 29 to April 2, 2006. In order to monitor the level of groundwater impacts and the magnitude of vertical migration of contaminants in deeper groundwater, two deep monitoring wells (MW-4D and MW-5D) were installed. These wells were screened between 35 and 45 feet bgs. The construction data for the new wells are presented in Table 1. All the wells were surveyed by Clearwater using a global positioning system (GPS) and laser level on March 16 and 28, 2006.

On the basis of apparent on-site groundwater mounding and unusually steep on-site groundwater gradients, ACEH staff requested a check of the groundwater elevation data. Each well's horizontal position was originally determined using a GPS survey in 2005. Clearwater field-checked the well locations of all the groundwater monitoring wells on August 18, 2006, using a 100-foot-long cloth tape. The horizontal distances between wells were measured, and the well positions were triangulated from these measurements. Several well locations were adjusted slightly on the base map; the revised base map with the resurveyed well locations is shown on **Figure 2** and has been used throughout reports generated since that time.

The TOC elevations of all the wells were remeasured on September 12, 2006, using a survey level and survey staff, accurate to within 1/100th of a foot. The TOC elevation for well MW-1 (northwest corner of site) was the starting datum, and the TOC elevation for all the other wells



was calculated as the relative difference from MW-1's TOC elevation. The surveyed TOC elevations were compared with the previously used TOC elevations, which were determined using a laser level. The relative difference in TOC elevation for each well was determined. The maximum vertical difference was found to be 0.12 foot for well IS-3. **Table 2** presents the original elevations values up to May 9, 2005 followed by the resurveyed TOC elevations after that date. The overall groundwater gradient pattern did not significantly change after completion of the monitoring well resurvey.

Sampling analysis for Escherichia coli (E. coli), total coliform, and water treatment byproducts as residual chlorine was performed November 2006 on groundwater samples obtained from wells IS-5, MW-8, and MW-7 in an attempt to identify whether on-site groundwater mounding could be caused by water and/or sewer line leaks; both E. coli and total coliform were present in IS-5 and MW-8, and water treatment byproducts were present in IS-5, MW-8, and MW-7. Leak testing was performed, and both a crack and an off-set in the sewer line were identified to exist near well IS-1. The sampling results for the *E. coli*, total coliform, and water treatment byproducts were reported in the *Quarterly Groundwater Monitoring Report - Fourth Quarter 2006*, and the sewer line leak test results were reported in the *Quarterly Groundwater Monitoring Report - First Quarter 2007*.

On May 30, 2006, Clearwater submitted its Soil and Groundwater Investigation Report to the ACEH, which included an updated Site Conceptual Model for the site. In response to the report, ACEH requested a Workplan to present proposed additional on- and off-site investigations. ACEH staff also provided Technical Comments to be addressed in the Workplan. Clearwater's Response to Comments was sent to ACEH on July 7, 2006. ACEH responded with an August 11, 2006, letter with revised Technical Comments to be incorporated into the Workplan. Clearwater submitted its Revised Workplan to the ACEH on December 19, 2006. ACEH responded in a letter dated January 4, 2007, with Technical Comments, which were to be addressed and incorporated during the field investigation; submittal of an additional revised Workplan was not necessary per ACEH staff. Clearwater is in the process of implementing the Revised Workplan including recent Technical Comments.

During the week of June 11–15, 2007, nine off-site direct-push soil borings and three borings logged using the cone penetrometer test (CPT) system were completed. Prior to the drilling event, a traffic plan was obtained from the City of Oakland to perform soil borings in the sidewalk and in the parking and traffic lanes of both High and San Leandro Streets; results of the June 2007 drilling event will be presented in an upcoming Site Investigation Report which will also include an updated Site Conceptual Model.

On August 2, 2007, Clearwater submitted the Quarterly Groundwater Monitoring Report - Second Quarter 2007. The Bioremediation Feasibility Study Report was submitted July 9, 2007. In early August 2007, Clearwater acquired access agreements from the owners of the two adjacent properties to perform soil borings on their properties. An ironwork shop, a sheet metal shop, and a smog-check business are located on one property; live-work lofts are located on the



other property. During September 2007 five soil borings were completed on adjacent properties and in October 2007 two deep on-site wells as well as 6 on-site vapor-wells were installed. All of these will be reported on in the upcoming Site Investigation Report.

GROUNDWATER MONITORING ACTIVITIES

The third quarter 2007 groundwater monitoring event was performed on August 15 and 16, 2007. The monitoring event included gauging the depths to groundwater, well purging and sampling, and laboratory analysis of groundwater samples.

Groundwater Gauging, Purging, and Sampling

On August 15, 2007, the depth to static groundwater in all 18 wells was measured (**Table 2**). An electronic water-level indicator accurate to within ± 0.01 foot was used to measure the depth to groundwater from the top of the well casing. All the wells were visually checked for the presence of light non-aqueous phase liquid (LNAPL) during well purging.

Prior to groundwater sampling, all wells were purged of approximately three well volumes using a disposable polyethylene bailer until temperature, conductivity, and pH measurements of the purge water stabilized according to Clearwater's Groundwater Monitoring and Sampling Field Procedures (Attachment A). Depth to water and well purging data were recorded on Well Gauging/Purging Calculations and Purging Data Sheets (Attachment B). Following recovery of water levels to at least 80% of their static levels, groundwater samples were collected from the wells using a new disposable polyethylene bailer for each well. The samples were labeled, documented on a chain-of-custody form, and placed on ice in a chilled cooler for transport to the laboratory. The purge water and rinseate were pumped into an internal tank in the sampling van and removed from the site for disposal at InStrat, Rio Vista, California, a licensed treatment, storage, and disposal facility.

Laboratory Analysis

Groundwater samples were analyzed by Kiff Analytical LLC (Kiff), of Davis, California. Kiff is a California Department of Health Services-certified laboratory. The samples were analyzed by Environmental Protection Agency Method 8260B for TPH-g; benzene, toluene, ethylbenzene, and total xylenes (BTEX); and seven oxygenates including MTBE, di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), tert-butanol (TBA). The laboratory analytical reports (#58075 and #58076) including the chain-of-custody forms are included in **Attachment C**.



GROUNDWATER MONITORING RESULTS

Observations During Groundwater Sampling

During well purging, apparent petroleum odors were detected emanating from monitoring wells MW-1 through MW-6, MW-8, IS-1 through IS-6, and extraction wells EW-1 and EW-2. Slight sheens were observed in the groundwater samples collected from monitoring wells MW-1, MW-4D, IS-1, and IS-4. Sheens were observed in the groundwater samples collected from wells MW-2, MW-4, MW-6, MW-8, IS-2, IS-5, EW-1, and EW-2. Groundwater purged from wells MW-2, MW-3, MW-4, MW-5D, IS-5, and EW-1 had high turbidity; groundwater in the remaining wells had moderate to low turbidity. The water ranged in color from brown to gray to tan. The field-measured water quality data are included in **Table 3** and are described in Natural Attenuation Processes and Recommended Monitoring Guidelines (**Attachment D**).

It should be noted that neither sheen nor odor was identified in the groundwater samples collected from monitoring wells MW-7 and MW-5D.

Groundwater Elevation and Flow Direction

On August 15 and 16, 2007, the depths to groundwater in the shallow monitoring wells ranged from 7.91 feet (IS-6) to 13.48 feet (MW-2) bgs. The shallow groundwater elevations ranged from a low of 8.50 feet above mean sea level (msl) in MW-2 to a high of 12.70 feet above msl in IS-2. The groundwater elevations in the deep monitoring wells MW-4D and MW-5D were 5.02 feet above msl and 5.01 feet above msl, respectively. The groundwater elevations observed in the shallow wells adjacent to the deep wells were approximately 7.25 feet higher than those observed in the deep wells. Wells MW-4D and MW-5D are screened from 35 feet to 45 feet bgs, and the shallow wells are all screened from 10 feet to 25 feet bgs. The groundwater contour elevation map for this event is shown on Figure 3. The groundwater elevation data from deep wells MW-4D and MW-5D were not used in the groundwater gradient calculation and flow direction shown on Figure 3.

The groundwater contour elevation map, Figure 3, shows variable groundwater flow directions and gradients caused by an apparent groundwater mound. Three representative flow directions and gradients are shown on Figure 3; at the northern corner of the site, the center of the site, and the southeast corner of the site. Groundwater flow at the north corner of the site is predominantly to the north-northwest at a gradient of approximately 0.38 feet per foot (ft/ft). Groundwater flow across the central portion of the site is predominantly to the south-southwest at a gradient of approximately 0.07 ft/ft. Groundwater flow in the southeast corner of the site is predominantly to the southeast at a gradient of approximately 0.05 ft/ft.



Groundwater Sample Analytical Results

Consistent with historical data, the primary constituents of concern (COCs) at the site are TPH-g, TPH-d, benzene, MTBE, and TBA. The groundwater analytical results are summarized in **Table 2**, and a distribution of the primary COCs is depicted on **Figure 4**.

TPH-g concentrations were reported below the laboratory method-reporting limit (MRL) in samples collected from all the monitoring wells, except for well MW-6 (4,000 μ g/L); however, the reporting limits ranged from a low of 50 μ g/L (MW-4D and MW-5D) to a high of 150,000 μ g/L (MW-4 and IS-3).

The elevated concentrations for diesel-range hydrocarbons (TPH-d) in the shallow wells ranged from a low of 390 μ g/L (MW-7) to a high of 4,400 μ g/L (MW-4 and MW-8). TPH-d was not reported above the laboratory MRLs in shallow monitoring wells MW-3, IS-2, IS-3, IS-5, and EW-2. The MRLs for TPH-d ranged from a low of 200 μ g/L (MW-3) to a high of 10,000 μ g/L (MW-5) in the shallow monitoring wells. TPH-d was reported at concentrations of 130 μ g/L and 330 μ g/L in deep monitoring wells MW-4D and MW-5D, respectively; however, the TPH-d hydrocarbon range did not exhibit a typical diesel chromatogram, which may indicate interference from other compounds.

Benzene concentrations reported above the laboratory MRLs ranged from a low of 42 μ g/L (MW-3) to a high of 4,300 μ g/L (IS-5). Benzene concentrations were not reported above the laboratory MRLs in samples collected from monitoring wells MW-1, MW-4D, MW-5, MW-5D, MW-7, IS-1, and IS-4. The highest benzene concentrations were observed around well IS-5, adjacent to the northeast fuel dispenser island.

MTBE concentrations were reported above the laboratory MRLs in all the shallow wells and ranged from a low of 230 μ g/L (MW-1) to 960,000 μ g/L (IS-3).

TBA concentrations were reported above the laboratory MRLs in all the shallow wells and ranged from $34,000~\mu\text{g/L}$ (MW-1) to $620,000~\mu\text{g/L}$ (MW-5). The highest TBA concentrations were observed on the northeast portion of the site in wells MW-5 and IS-4. Isolated high concentrations of TBA were also observed in wells MW-8 and EW-1 (**Figure 7**). The high TBA concentrations are likely due to the biodegradation of MTBE. TBA concentrations in wells MW-5 and IS-4 have been steadily increasing over time as MTBE concentrations in these wells have been steadily decreasing (**Figures 8** and **9**, respectively).

A slight sheen was observed in the groundwater sample collected from monitoring well MW-4D, although a minor concentration of TPH-d was the only analyte detected above the laboratory MRLs.



FINDINGS AND CONCLUSIONS

The mounded groundwater elevation contour pattern observed during this quarterly monitoring event is consistent with historical groundwater elevation contour patterns (Figure 3). A groundwater mound appears to be located between the site building and the two dispenser islands. A significant difference was measured in the hydraulic head between the shallow and deep monitoring wells.

The groundwater sample analytical results indicate that the site groundwater continues to be significantly impacted by TPH-g, TPH-d, benzene, MTBE, and TBA. TBA levels have generally increased over time as MTBE levels have decreased.

FUTURE ACTIVITIES

Clearwater is in the process of implementing the *Revised Workplan* including ACEH's Technical Comments dated January 2, 2007. The *Revised Workplan* activities will include reporting on the advancement of soil borings on the adjacent properties, logging of two additional on-site borings using the CPT system, installation of two additional deep groundwater monitoring wells and six permanent vapor wells, and scheduling a High-Vacuum Dual Phase Extraction Pilot Test and a Persulfate Bench Test on soil cuttings and groundwater obtained during the installation of the deep groundwater monitoring wells.



CERTIFICATION

This report was prepared under the supervision of a Professional Geologist registered in the State of California. All statements, conclusions, and recommendations are based solely upon published results from previous consultants, field observations by Clearwater staff, 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 regulatory agency. A third party should not rely upon the information and interpretation contained in this document.

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.

LICENSED PROFESSIONALS

In-house licensed professionals direct all projects. These professionals, including geologists or engineers, shall be guided by the highest standards of ethics, honesty, integrity, fairness, personal honor, and professional conduct. To the fullest extent possible, the licensed professional shall protect the public health and welfare and property in carrying out their professional duties. In the course of normal business, recommendations by the in-house professional may include the use of equipment, services, or products in which the Company has an interest. Therefore, the Company is making full disclosure of potential or perceived conflicts of interest to all parties.

Sincerely,

CLEARWATER GROUP

ROBERT L. NELSON
No. 2087
CERTIFIED
ENGINEERING
GEOLOGIST
OF CALIFORNIA

Robert L. Nelson, #P.G. 6270, #C.E.G. 2087

Senior Geologist

anges A. Jacobs, P.G. #48

Chief Hydrogeologist

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

OF CALIFOR



FIGURES

Figure 1: Site Vicinity Map

Figure 2: Site Plan

Figure 3: Groundwater Elevation Contour Elevation Map -August 15, 2007

Figure 4: Petroleum Hydrocarbon and Oxygenate Distribution Map - August 15-16, 2007

Figure 5: Benzene ISO-Contour Map – August 15-16, 2007 Figure 6: MTBE ISO-Contour Map – August 15-16, 2007 Figure 7: TBA ISO-Contour Map – August 15-16, 2007

Figure 8: Concentrations of MTBE and TBA in Monitoring Well MW-5

Figure 9: Concentrations of MTBE and TBA in Monitoring Well IS-4

TABLES

Table 1: Well Construction Data

Table 2: Groundwater Elevations and Groundwater Sample Analytical Results

Table 3: Water Quality Data

ATTACHMENTS

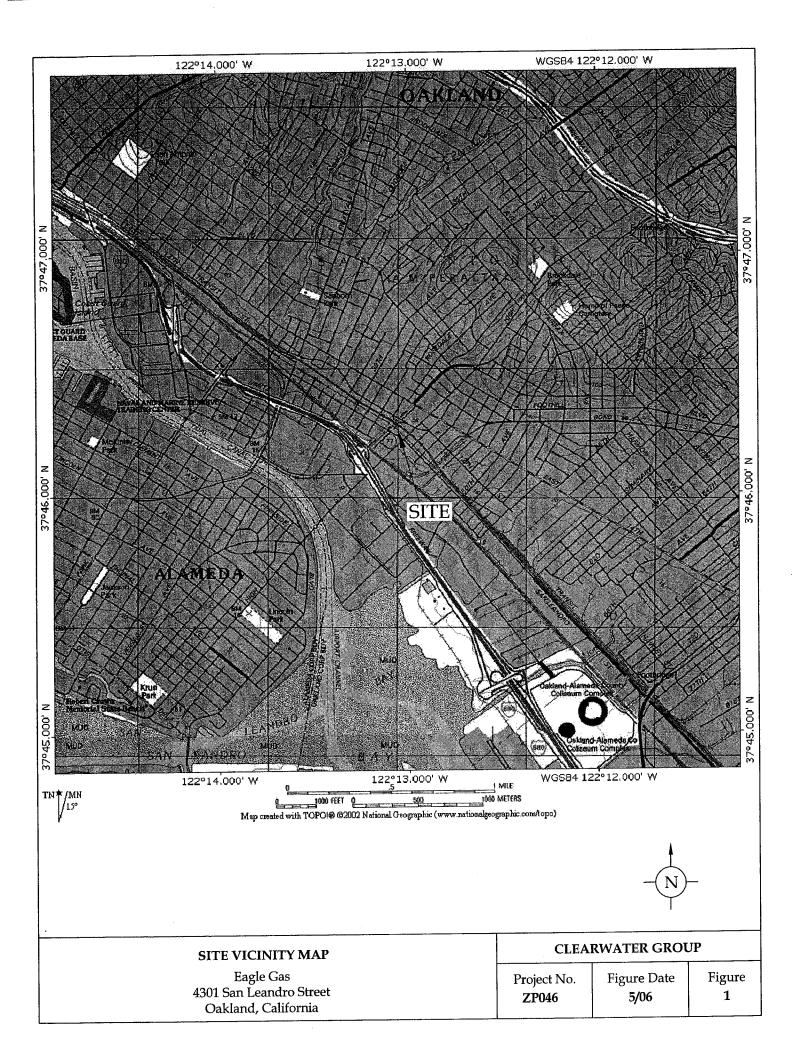
Attachment A: Groundwater Monitoring and Sampling Field Procedures

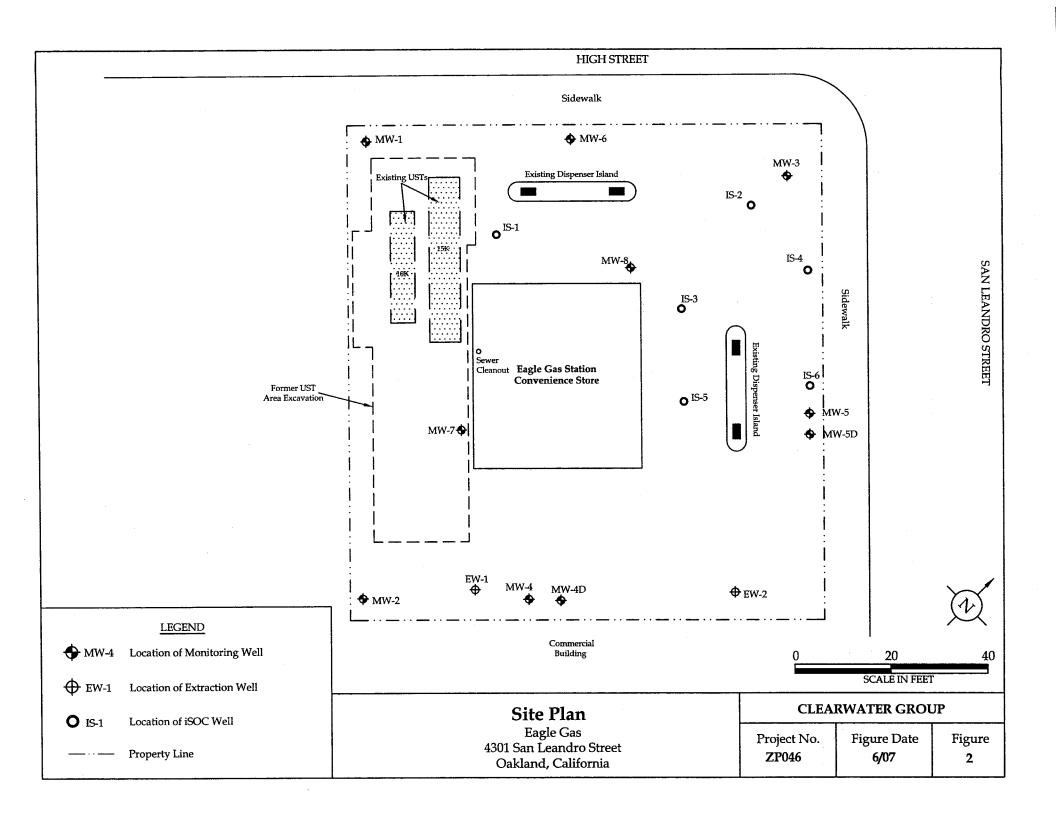
Attachment B: Well Gauging/Purging Calculations Data Sheets

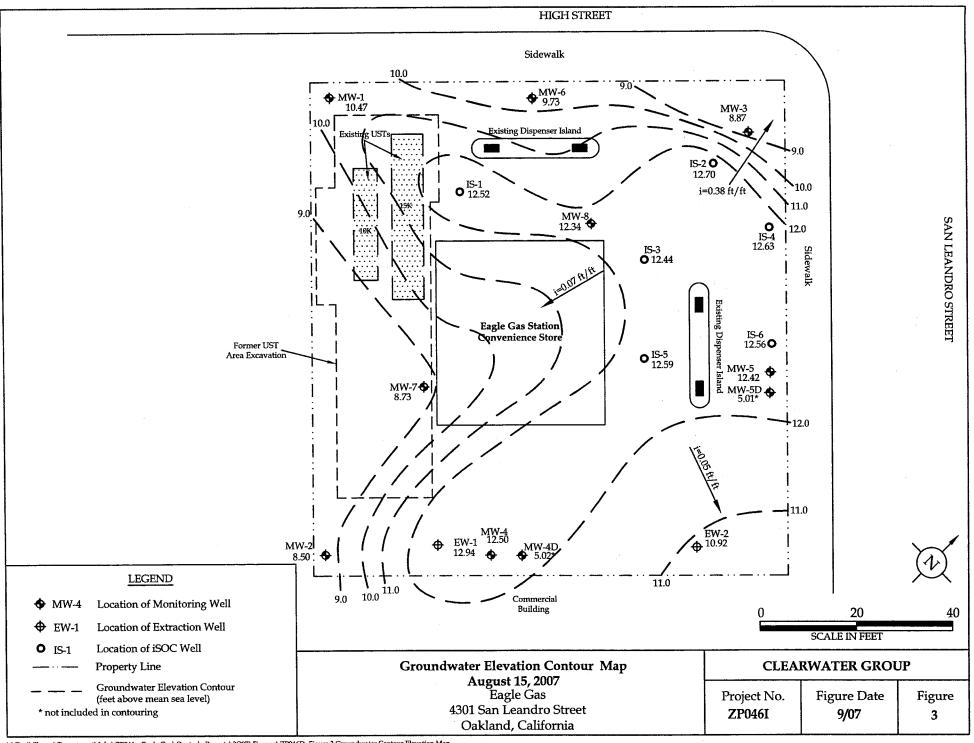
Attachment C: Kiff Analytical Report #58075 and #58076 with Chain-of-Custody Form

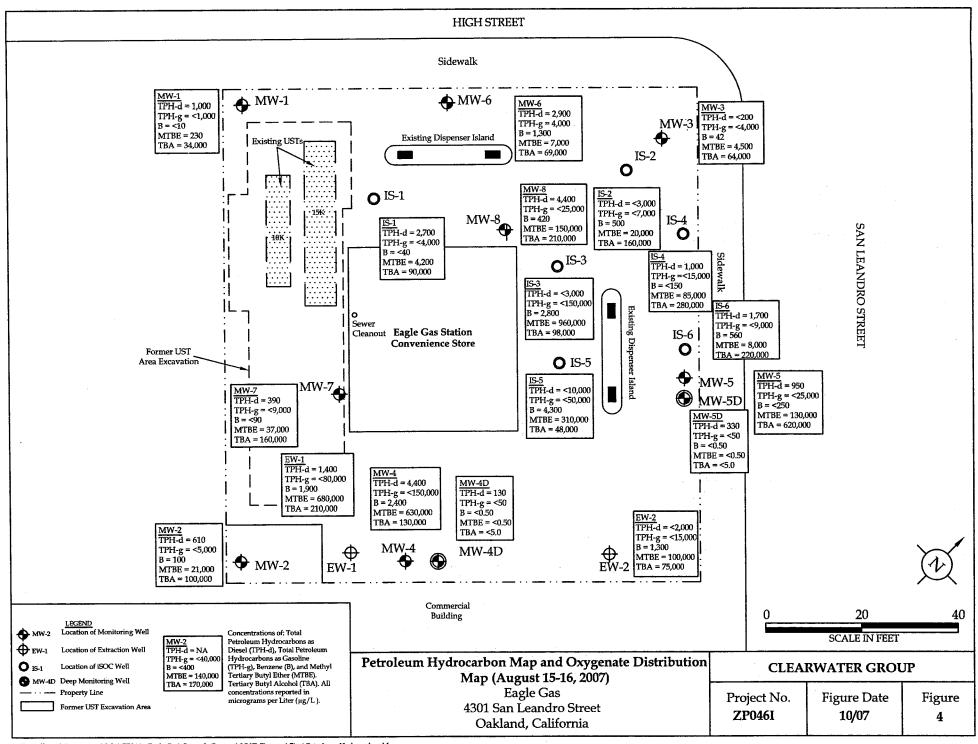
Attachment D: Natural Attenuation Processes and Recommended Monitoring Guidelines

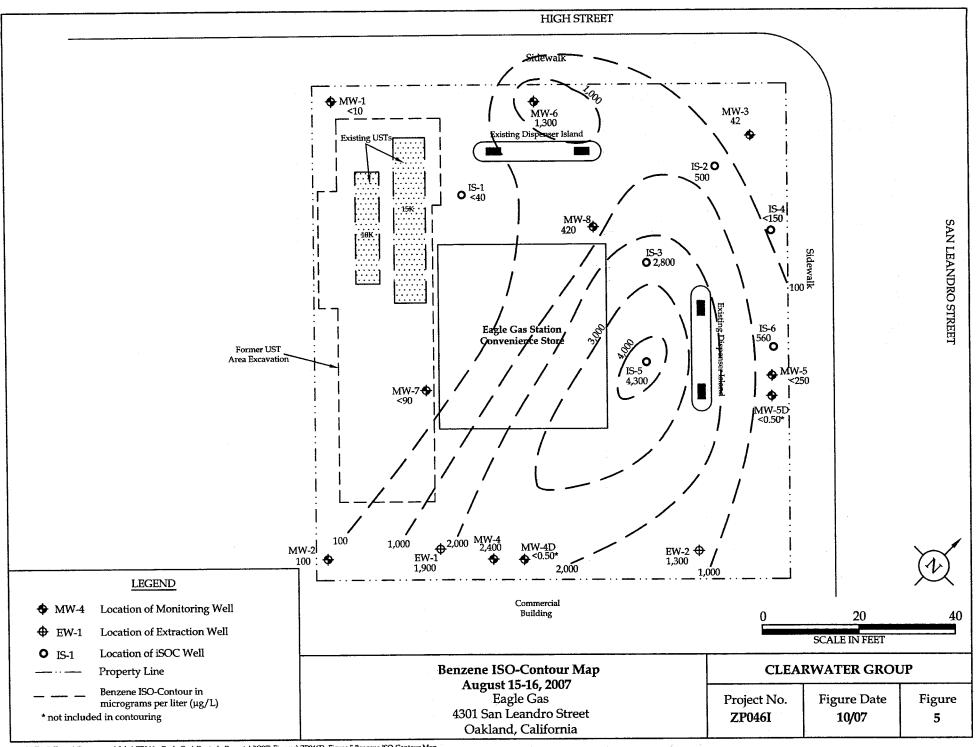
FIGURES

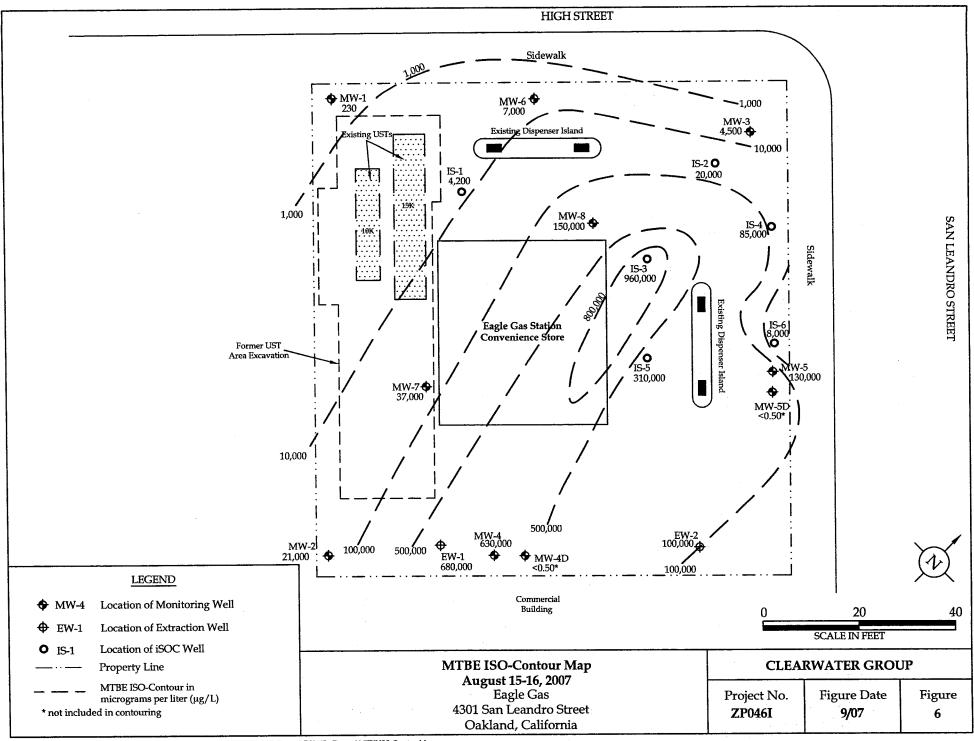












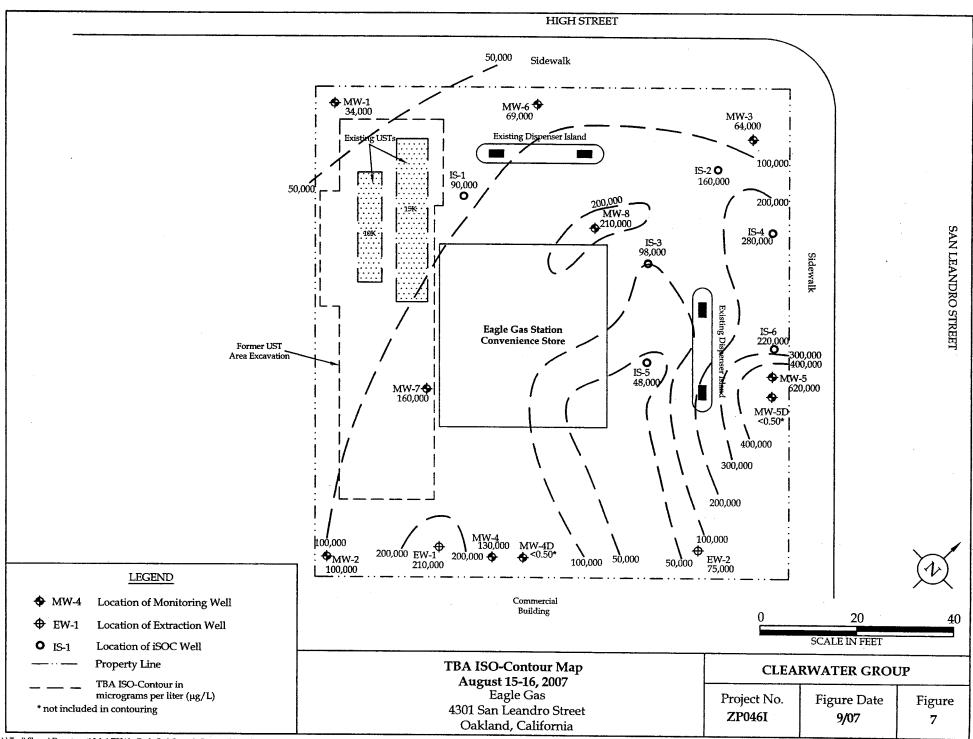
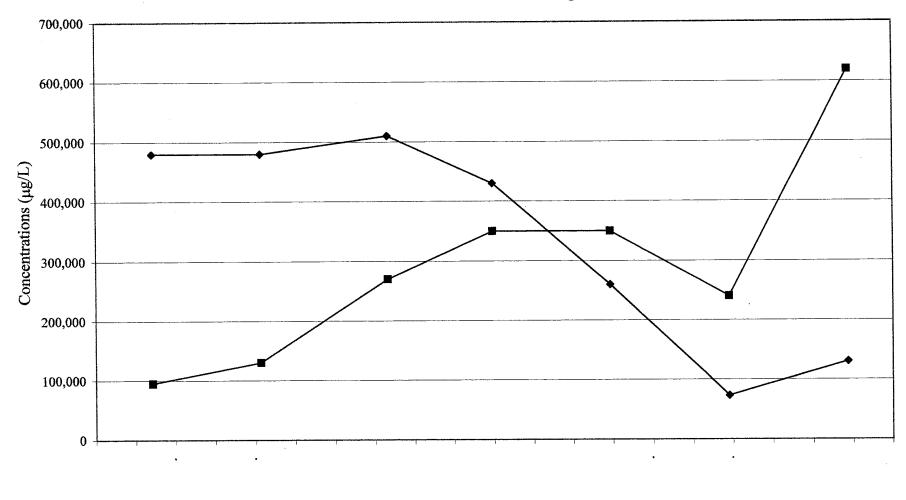
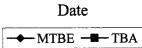


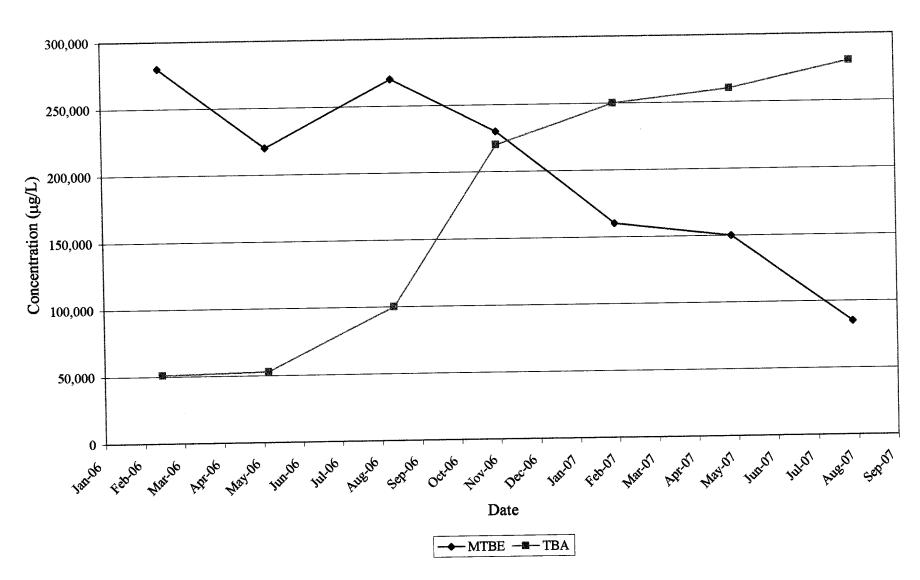
FIGURE 8
Concentrations of MTBE and TBA in Monitoring Well MW-5





Clearwater Project ZB046I September 2007

FIGURE 9
Concentrations of MTBE and TBA in Monitoring Well IS-4



TABLES

TABLE 1 WELL CONSTRUCTION DATA

4301 San Leandro Street Oakland, California

Well I.D.	Date Installed	Installed by	Borehole Diameter (inches)	Casing Diameter (inches)	Depth of Borehole (feet)	Cement (feet)	Bentonite Seal (feet)	Filter Pack (feet)	Filter Pack Material	Screened Interval (feet)	Slot Size (inches)
MW-1	9/26/2000	West Hazmat	8	2	25	0-5	5-7	7-25	2/12 sand	10-25	0.01
MW-2	9/26/2000	West Hazmat	8	2	25	0-5	5-7	7-25	2/12 sand	10-25	0.01
MW-3	9/26/2000	West Hazmat	8	2	25	0-5	5-7	7-25	2/12 sand	10-25	0.01
MW-4	12/19/2005	HEW Drilling	8	2	25	0-5	5-8	8-25	#3 sand	10-25	0.02
MW-4D	12/19/2005	HEW Drilling	8	2	45	0-30	30-33	33-45	#3 sand	35-45	0.02
MW-5	12/15/2005	HEW Drilling	8	2	25	0-5	5-8	8-25	#3 sand	10-25	0.02
MW-5D	12/15/2005	HEW Drilling	8	2	45	0-30	30-33	33-45	#3 sand	35-45	0.02
MW-6	12/20/2005	HEW Drilling	8	2	25	0-5	5-8	8-25	#3 sand	10-25	0.02
MW-7	12/19/2005	HEW Drilling	8	2	25	0-5	5-8	8-25	#3 sand	10-25	0.02
MW-8	12/21/2005	HEW Drilling	8	2	25	0-5	5-8	8-25	#3 sand	10-25	0.02
IS-1	12/20/2005	HEW Drilling	8	2	25	0-3	3-6	6-25	#3 sand	10-25	0.02
IS-2	12/20/2005	HEW Drilling	8	2	25	0-3	3-6	6-25	#3 sand	10-25	0.02
IS-3	12/21/2005	HEW Drilling	8	2	25	0-3	3-6	6-25	#3 sand	10-25	0.02
IS-4	12/20/2005	HEW Drilling	8	2	25	0-3	3-6	6-25	#3 sand	10-25	0.02
IS-5	12/21/2005	HEW Drilling	8	2	25	0-3	3-6	6-25	#3 sand	10-25	0.02
IS-6	12/20/2005	HEW Drilling	8	2	25	0-3	3-6	6-25	#3 sand	10-25	0.02
EW-1	12/16/2005	HEW Drilling	8	4	25	0-3	3-6	6-25	#3 sand	10-25	0.02
EW-2	12/16/2005	HEW Drilling	8	4	25	0-3	3-6	6-25	#3 sand	10-25	0.02

Note: All depths and intervals are below ground surface

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	X	MTBE	DIPE	ETBE	TAME	TBA	Methanol			EDB
ID	Date	(feet)	(feet)	(feet)	(µg/L)	(μg/L)	(μg/L)	(µg/L)	(µg/L)	(μg/L)	(µg/L)	(µg/L)	(μg/L)	(µg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)
ESL (μg/	L)				640	500	46	130	290	100	1,800				18,000		50,000	200	150
MW-1	10/3/2000	18.37	8.96	9.41	460	93,000	< 500	< 500	< 500	< 500	130,000	<10,000	<10,000	<10,000	<2,000				
	10/27/2000	18.37	7.27	11.10															
	1/26/2001	18.37	7.60	10.77	1,600*	51,000	270	<100	<100	<100	77,000	<5,000	<5,000	<5,000	<20,000				
	5/8/2001	18.37	7.50	10.87	470*	36,000*	<100	<100	<100	<100	15,000	<5,000	<5,000	<5,000	<20,000				
	8/3/2001	18.37	7.09	11.28	2,200*	19,000*	< 50	59	< 50	< 50	96,000	<5,000	<5,000	<5,000	<20,000				
	7/1/2003	18.37	7.59	10.78	3,000	<25,000	<250	<250	<250	<250	170,000	<250	<250	980	8,700				
	10/1/2003	18.37	8.36	10.01	2,600	<20,000	< 200	<200	< 200	<200	69,000	<200	<200	270	15,000				
	2/13/2004	18.37	8.80	9.57	1,800	<10,000	<100	<100	<100	<100	85,000	<100	<100	390	79,000				
	5/17/2004	18.37	10.92	7.45	5,400	<15,000	<150	<150	<150	<150	60,000	<150	<150	260	160,000				
	8/6/2004	18.37	7.76	10.61	510	<10,000	<100	<100	<100	<100	26,000	<100	<100	100	250,000				
	11/12/2004	18.37	9.25	9.12	3,500	<5,000	<50	< 50	< 50	< 50	25,000	<50	<50	150	160,000				
	2/15/2005		10.12	8.25	2,900	<5,000	< 50	< 50	<50	<50	12,000	<50	<50	70	160,000				
	5/9/2005	18.37	9.58	8.79	1,700	<5,000	<50	< 50	<50	<50	11,000	<50	<50	53	200,000				
	8/8/2005**	20.08	10.09	9.99	2,000	<5,000	<50	<5 0	< 50	<50	8,500	<50	<50	<50	250,000				
	11/16/2005	20.08	9.81	10.27	3,600	<5,000	<50	< 50	< 50	<50	3,800	< 50	<50	<50	140,000	<5,000	<500	<50	<50
	2/22/2006	20.08	9.58	10.50	2,600	<5,000	< 50	<50	< 50	< 50	5,800	<50	<50	<50	120,000	<5,000	<500	<50 <50	<50 <50
	5/16/2006	20.08	6.89	13.19	4,700	<5,000	<50	<50	<50	<5 0	3,700	<50	<50	<50	150,000	<5,000	<500	<50	<50
	8/23/2006'	20.08	9.21	10.87	2,000	<5,000	< 50	<50	<50	<50	3,700	<50	<50	<50	110,000	<5,000	<500	NA	NA
	11/13/2006	20.08	8.55	11.53	NA	<4,000	<40	<40	<40	<40	2,000	<40	<40	<40	79,000	NA	NA NA	NA NA	NA NA
	2/13/2007	20.08	7.11	12.97	900	<2,500	<25	<25	<25	<25	3,700	<25	<25	25 -25	63,000	NA NA	NA NA	NA NA	NA NA
	5/15/2007	20.08		13.45	3,000	<2,500	<25	<25	<25	<25	1,100	<25	<25	<25	52,000	NA NA	NA NA	NA NA	NA NA
	8/15/2007	20.08	9.61	10.47	1,000	<1,000	<10	<10	<10	<10	230	<10	<10	<10	34,000	INA	NA	NA	INA
MW-2	10/3/2000	20.28	20.26	0.02	210	250,000	<1.250	<1.250	<1.250	<1.250	400,000	<25.000	<25.000	<25,000	<100,000)			
141 44-2	10/3/2000	20.28		6.40		220,000													
	1/26/2001	20.28			6,000*	740,000	3,800	<500	940	1,600	1.000.000	<50.000	<50,000	<50,000	<200,000)			
	5/8/2001	20.28		8.23	2,100*	140,000	2,800	<250	780	640	840,000	<50,000	<50,000	<50,000	<200,000)			
	8/3/2001	20.28			2,600*	42.000*	1,100	63	230	130	880,000	<25,000	<25,000	<25,000	<100,000)			
	7/1/2003	20.28			2,200	<200,000	,				790,000	<2,000	,	,	<20,000				
	10/1/2003		15.99		870	<100,000	,	,	,	,	,	<1,000	,	•	<20,000				
	10/1/2003	20.20	10.77	1,20	.0.0	200,000	-,	-,-00	-,	-,-,-	,	-,	-,	,	•				

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	Х	MTBE	DIPE	ETBE	TAME	TBA	Methanol	Ethanol	DCA	EDB
ID	Date	(feet)	(feet)	(feet)	$(\mu g/L)$	(μg/L)	(µg/L)	(µg/L)	(µg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)_	(μg/L)	(μg/L)	(μg/L)	(µg/L)	(μg/L)	(µg/L)
ESL (μg/	L)				640	500	46	130	290	100	1,800				18,000		50,000	200	150
MW-2	2/13/2004	20.28	13.88	6.40	1,200	<20,000	860	<200	260	<200	710,000	<200	<200	2,000	<25,000				
cont'd	5/17/2004	20.38	14.68	5.70	2,500	<50000	860	< 500	< 500	< 500	760,000	< 500	< 500	2,500	13,000J				
	8/6/2004	20.38	15.36	5.02	2,500	<50000	590	< 500	< 500	< 500	810,000	< 500	< 500	3,600	17,000J				
	11/12/2004	20.38	15.49	4.89	500	<150,000	<1500	<1500	<1500	<1500	700,000	<1500	<1500	2,800	25,000J				
	2/15/2005	20.38	14.16	6.22	990	<150,000	<1,500	<1,500	<1,500	<1,500	630,000	<1,500	<1,500	2,600	32,000				
	5/9/2005	20.38	13.62	6.76	1,100	<150,000	<1,500	<1,500	<1,500	<1,500	570,000	<1,500	<1,500	2,300	32,000				
	8/8/2005**	22.05	13.36	8.69	770	<150,000	<1,500	<1,500	<1,500	<1,500	770,000	<1,500	<1,500	2,200	85,000				
	11/16/2005	22.05	14.51	7.54	890	<70,000	< 700	< 700	< 700	< 700	430,000	< 700	< 700	2,100	130,000	<100,000	<7,000	< 700	< 700
	2/22/2006	22.05	12.69	9.36	<1,500	<70,000	800	< 700	< 700	< 700	400,000	< 700	< 700	1,700	130,000	<70,000	<7,000	< 700	< 700
	5/16/2006	22.05	12.01	10.04	1,100	<70,000	< 700	< 700	< 700	< 700	250,000	< 700	< 700	940	140,000	<70,000	<7,000	< 700	< 700
	8/23/20061	21.98	11.33	10.65	660	<40,000	<400	<400	<400	<400	200,000	<400	<400	830	170,000	<40,000	<4,000	<400	<400
	11/13/2006	21.98	13.64	8.34	NA	<40,000	<400	<400	<400	<400	140,000	<400	<400	490	170,000	NA	NA	NA	NA
	2/13/2007	21.98	12.78	9.20	780	<20,000	250	< 200	<200	< 200	100,000	<200	< 200	240	130,000	NA	NA	NA	NA
	5/16/2007	21.98	13.17	8.81	800	<7,000	150	< 70	<70	< 70	44,000	<70	<70	120	130,000	NA	NA	NA	NA
	8/16/2007	21.98	13.48	8.50	610	<5,000	100	< 50	< 50	< 50	21,000	< 50	< 50	<80⁺⁺	100,000	NA	NA	NA	NA
MW-3	10/3/2000	18.98			120	83,000	< 500	< 500	< 500	< 500	33,000	<2,500	<2,500	<2,500	<10,000				
	10/27/2000	18.98	18.75	0.23															
	1/26/2001	18.98	13.38	5.6 0	900*	230,000	930	< 500	< 500	< 500	330,000	,	,	,	<100,000				
	5/8/2001	18.98	11.82	7.16	1,100*	95,000	840	<250	<250	<250	390,000	,	•	<12,500	•				
	8/3/2001	18.98	13.44	5.54	290*	30,000*	< 50	51	< 50	< 50	270,000			<12,500					
	7/1/2003	18.98	12.67	6.31	620	<50,000	< 500	< 500	< 500	< 500	230,000	< 500	< 500	1,800	<5,000				
	10/1/2003	18.98	14.04	4.94	370	<20,000	<200	<200	<200	<200	120,000	<200	<200	1,200	<5,000				
	2/13/2004	18.98	12.20	6.78	430	<20,000	280	<200	<200	<200	210,000	<200	<200	1,200	<5,000				
	5/17/2004	18.98	11.87	7.11	920	<25,000	<250	<250	<250	<250	150,000	<250	<250	1,100	5,600J				
	8/6/2004	18.98	13.07	5.91	78	<20,000	<200	< 200	<200	<200	110,000	<200	<200	760	<2,500	***			
	11/12/2004	18.98	12.83	6.15	120	<20,000	<200	< 200	< 200	<200	100,000	<200	<200	660	6,000				
	2/15/2005	18.98	11.95	7.03	130	<25,000	<250	<250	<250	<250	110,000	<250	<250	760	12,000	***			
	5/9/2005	18.98	10.51	8.47	320	<15,000	<150	<150	<150	<150	97,000	<150	<150	780	30,000				
	8/8/2005**	20.73	10.98	9.75	180	<15,000	<150	<150	<150	<150	75,000	<150	<150	500	44,000				

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

									_	•	. CEDE	DIDE	ETDE	TAME	TDA	Methanol	Ethanal	DCA	EDB
Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	X	MTBE	DIPE		TAME	TBA	(μg/L)	(µg/L)	DCA (μg/L)	EDB (μg/L)
ID ID	Date	(feet)	(feet)	(feet)	(μg/L)	(μg/L)	(μg/L)	(μg/L) 130	(μg/L) 290	(μg/L) 100	(μg/L) 1,800	(μg/L)	(μg/L)	(μg/L)	(μg/L) 18,000	(µg/L)	50,000	200	150
ESL (μg/					640	500	46							190	38,000	<5,000	<500	<50	<50
MW-3	11/16/2005		12.89	7.84	<200	<5,000	<50	<50	<50	< 5 0	37,000	<50	<50	420	65,000	<9,000	<500	<50	< 5 0
cont'd	2/22/2006	20.73	10.31	10.42	<600	<5,000	88	<50	<50	<50	57,000	<50 <00	<50 <90	340	68,000	<9,000	<900	<90	<90
	5/16/2006	20.73	9.03	11.70	<600^	<9,000	110	<90	<90	<90	42,000	<90	<40	120	60,000	<4,000	<400	<40	<40
	8/23/2006'		10.81	9.87	<200^	<4,000	<40	<40	<40	<40	18,000	<40	<20	30	54,000	NA	NA	NA	NA
	11/13/2006		12.29	8.39	NA	<2,000	<20	<20	<20	<20	6,100	<20	<40	82	65,000	NA NA	NA	NA	NA
	2/13/2007		11.23	9.45	<200^	<4,000	52	<40	<40	<40	13,000	<40 <40	<40	77	71,000	NA NA	NA	NA	NA
	5/15/2007		10.39	10.29	<300^	<4,000	67	<40	<40	<40	12,000 4,500	<40	<40	<40	64,000	NA	NA	NA	NA
	8/15/2007	20.68	11.81	8.87	<200^	<4,000	42	<40	<40	<40	4,500	\4 0	\4 0	~4 0	04,000	INA	1471	1471	1411
3.6337.4	0/00/0006	21.62	7.07	12.76	~° 000	<150,000	2 200	2,000	1,600	3,800	770,000	<1,500	<1,500	3,300	59,000	<150,000	<15,000	<1.500	<1,500
MW-4	2/22/2006	21.63	7.87	13.76 13.59	3,800	<70,000	2,100	<700	930	1,500	410,000	<700	<700	2,500	110,000	<70,000		<700	< 700
	5/16/2006	21.63	8.04 9.77	11.76	8,400	89,000	4,500	<700	2,100	2,800	870,000	<700	<700	4,000	89,000	<70,000	,	<700	< 700
	8/23/2006'	21.53 21.53	9.77 8.78	12.75	,	<150.000	,		<1,500	,	950,000	<1,500	<1,500	4,000	110,000	NA	NA	NA	NA
	11/13/2006	21.53	7.56	13.97		<150,000	,	,	,	<1,500	640,000	<1,500	<1,500	2,900	130,000	NA	NA	NA	NA
	2/13/2007 5/16/2007	21.53	7.97		-,	<70,000	,	<700	1,000	940	430,000	<700	< 700	2,300	160,000	NA	NA	NA	NA
	8/16/2007	21.53	9.03	12.50	. ,	<150,000	,		,		630,000	<1,500	<1,500	4,300	130,000	NA	NA	NA	NA
	6/10/2007	21.33	9.03	12.50	7,700	130,000	2,100	1,500	1,500	1,500	500,500	-,	-,	.,					
MW-4D	2/21/2006	21.54	15.58	5.96	< 50	<90	< 0.90	< 0.90	< 0.90	< 0.90	440	< 0.90	< 0.90	2	< 5.0	<90	<9.0	< 0.90	< 0.90
1,1,1, 42	5/16/2006		13.23		<50	<50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	<5.0	< 50	< 5.0	< 0.50	< 0.50
	8/23/2006'		15.33		<50	<50	< 0.50	< 0.50	< 0.50	< 0.50	1	< 0.50	< 0.50	< 0.50	<5.0	93	8	< 0.50	< 0.50
	11/13/2006	21.44	16.23	5.21	NA	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	<5.0	NA	NA	NA	NA
	2/13/2007	21.44	15.73	5.71	< 50	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	<5.0	NA	NA	NA	NA
	5/15/2007	21.44	15.38	6.06	<50	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0	NA	NA	NA	NA
	8/15/2007	21.44	16.42	5.02	130 ^^	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0	NA	NA	NA	NA
MW-5	2/21/2006	20.48	6.63	13.85	<3,000	<10,000	460	<100	170	<100	480,000	<100	<100	3,000	95,000	<90,000	<1,000	<100	<100
	5/16/2006	20.48	6.62	13.86	1,600	<90,000	<900	<900	<900	<900	480,000	<900	<900	2,300	130,000	<90,000	<9,000	<900	<900
	8/23/2006'	20.41	7.62	12.79	1,400	<90,000	<900	<900	<900	<900	510,000	<900	<900	2,400	270,000	<90,000	<9,000	<900	<900
	11/13/2006	20.41	7.31	13.10	NA	<90,000	<900	<900	<900	<900	430,000	<900	<900	2,200	350,000	NA	NA	NA	NA
	2/13/2007	20.41	6.54	13.87	1,000	<50,000	< 500	< 500	< 500	< 500	260,000	< 500	< 500	740	350,000	NA	NA	NA	NA
	5/16/2007	20.41	6.79	13.62	2,200 ^^	<15,000	650	<150	<150	<150	73,000	<150	<150	610	240,000	NA	NA	NA	NA
	8/16/2007	20.41	7.99	12.42	950	<25,000	<250	<250	<250	<250	130,000	<250	<250	550	620,000	NA	NA	NA	NA

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	Т	Е	х	MTBE	DIPE	ЕТВЕ	TAME	TBA	Methanol	Ethanol	DCA	EDB
ID	Date	(feet)	(feet)	(feet)	(μg/L)	(μg/L)	(μg/L)	- (μg/L)	- (μg/L)	(μg/L)	(ug/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
ESL (μg/		(ICCI)	(ICCL)	(1000)	640	500	46	130	290	100	1,800				18,000		50,000	200	150_
	2/21/2006	20.32	13.68	6.64	<50	<50	< 0.50	< 0.50	< 0.50	< 0.50	8	< 0.50	<0.50	< 0.50	6	<50	< 5.0	< 0.50	< 0.50
1.111 02	5/16/2006	20.32		7.60	<50	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0	< 50	< 5.0	< 0.50	< 0.50
	8/23/2006'		14,48	5.74	< 50	< 50	< 0.50	< 0.50	< 0.50	< 0.50	56	< 0.50	< 0.50	< 0.50	< 5.0	120	6	< 0.50	< 0.50
	11/13/2006	20.22	14.98	5.24	NA	< 50	< 0.50	< 0.50	< 0.50	< 0.50	81	< 0.50	< 0.50	< 0.50	<5.0	NA	NA	NA	NA
	2/13/2007	20.22	14.48	5.74	< 50	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	<5.0	NA	NA	NA	NA
	5/15/2007	20.22	14.13	6.09	< 50	< 50	< 0.50	< 0.50	< 0.50	< 0.50	1.1	< 0.50	< 0.50	< 0.50	<5.0	NA	NA	NA	NA
	8/15/2007	20.22	15.21	5.01	330 ^^	< 50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0	NA	NA	NA	NA
MW-6	2/22/2006	20.45	9.88	10.57	2,900	<10,000	620	<100	<100	<100	50,000	<100	<100	210	24,000	<10,000	<1,000	<100	<100
	5/16/2006	20.45	9.35	11.10	3,200	<9,000	1,500	<90	<90	<90	50,000	<90	<90	280	27,000	<10,000	<900	<90	<90
	8/23/2006'	20.47	10.48	9.99	3,400	<9,000	1,600	<90	<90	<90	39,000	<90	<90	190	55,000	<9,000++	<900	<90	<90
	11/13/2006	20.47	10.86	9.61	NA	<5,000	1,200	< 50	< 50	<50	17,000	< 50	< 50	66	71,000	NA	NA	NA	NA
	2/13/2007	20.47	10.31	10.16	2,400	4,900	1,800	<25	<25	<25	14,000	<25	<25	65	55,000	NA	NA	NA	NA
	5/15/2007	20.47	10.35	10.12	2,600	4,900	1,900	21	<20	<20	12,000	<20	<20	55	60,000	NA	NA	NA	NA
	8/15/2007	20.47	10.74	9.73	2,900	4,000	1,300	<20	<20	<20	7,000	<20	<20	32	69,000	NA	NA	NA	NA
3.4337.77	2/22/2006	21.13	11.72	9.41	400	<10,000	<100	<100	<100	<100	88,000	<100	<100	430	90,000	<10,000	<1,000	<100	<100
MW-7	2/22/2006 5/16/2006	21.13		12.41	340	<5,000	<50	<50	<50	<50	28,000	<50	<50	120	47,000	<5,000	< 500	<50	< 50
	8/23/2006'		11.34	9.80	280	<9,000	<90	<90	<90	<90	62,000	<90	<90	280	160,000	<18,000		<90	<90
	11/13/2006		12.53		NA	<9,000	<90	<90	<90	<90	49,000	<90	<90	280	130,000	ŇA	NA	NA	NA
	2/13/2007		11.83	9.31	210	<7,000	<70	<70	<70	<70	33,000	<70	<70	170	130,000	NA	NA	NA	NA
	5/15/2007		10.99		250	<5,000	<50	<50	<50	<50	36,000	<50	<50	190	140,000	NA	NA	NA	NA
	8/15/2007		12.41		390	<9,000	<90	<90	<90	<90	37,000	<90	<90	170	160,000	NA	NA	NA	NA
	0/15/2007	21.1 .	12.11	0.75		2,000					,				ŕ				
MW-8	2/22/2006	21.03	7.28	13.75	6,800	<10,000	1,200	<100	270	220	400,000	<100	<100	2,100	63,000	<300,000	<1,000	<100	<100
	5/16/2006	21.03	7.48	13.55	3,800	<90,000	1,600	<900	<900	<900	620,000	<900	<900	3,000	46,000	<90,000	<9,000	<900	<900
	8/23/2006	20.95	8.19	12.76	17,000	<90,000	940	<900	<900	<900	340,000	<900	<900	1,200	74,000	<90,000	<9,000	<900	<900
	11/13/2006	20.95		12.80	NA	<25,000	490	<250	<250	<250	120,000	<250	<250	360	130,000	NA	NA	NA	NA
	2/13/2007	20.95	6.58	14.37	4,100	<90,000	1,700	<900	<900	<900	410,000	<900	<900	1,700	160,000	NA	NA	NA	NA
	5/16/2007	20.95	7.24	13.71	3,300	<50,000	650	< 500	< 500	< 500	190,000	< 500	< 500	750	170,000	NA	NA	NA	NA
	8/16/2007	20.95	8.61	12.34	4,400	<25,000	420	<250	<250	<250	150,000	<250	<250	460	210,000	NA	NA	NA	NA
					•	•													

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	x	MTBE	DIPE	ETBE	TAME	TBA	Methanol			EDB
ID	Date	(feet)	(feet)	(feet)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(µg/L)	(µg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)
ESL (μg/	L)				640	500	46	130	290	100	1,800				18,000		50,000	200	150
IS-1	2/22/2006	20.57	6.91	13.66	4,400	<5,000	160	< 50	< 50	< 50	21,000	< 50	< 50	64	130,000	<5,000	< 500	<50	< 50
	5/16/2006	20.57	7.01	13.56	3,800	<5,000	150	< 50	< 50	< 50	24,000	< 50	< 50	58	130,000	<5,000	< 500	< 50	< 50
	8/23/2006'	20.58	7.82	12.76	3,800	<5,000	65	< 50	< 50	< 50	5,800	< 50	< 50	< 50	110,000	<5,000	< 500	< 50	< 50
	11/13/2006	20.58	8.21	12.37	NA	<5,000	< 50	< 50	< 50	< 50	1,000	< 50	< 50	< 50	100,000	NA	NA	NA	NA
	2/13/2007	20.58	6.14	14.44	1,800	<4,000	<40	<40	<40	<40	3,600	<40	<40	<40	110,000	NA	NA	NA	NA
	5/15/2007	20.58	7.04	13.54	2,000	<4,000	49	<40	<40	<40	2,800	<40	<40	<40	98,000	NA	NA	NA	NA
	8/15/2007	20.58	8.06	12.52	2,700	<4,000	<40	<40	<40	<40	4,200	<40	<40	<40	90,000	NA	NA	NA	NA
IS-2	2/22/2006	20.87	6.92	13.95	<4,000	8,600	1,200	<9.0	240	17	190,000	<9.0	9	1,700	29,000	<150,000		<9.0	<9.0
	5/16/2006	20.87	6.99	13.88	<3,000^	<15,000	500	<150	<150	<150	130,000	<150	<150	880	24,000	<15,000	,	<150	<150
	8/23/2006'	20.78	7.91	12.87	2,700	<40,000	490	<400	<400	<400	150,000	<400	<400	1,200	39,000	<40,000	<4,000	<400	<400
	11/13/2006	20.78	8.23	12.55	NA	<40,000	<400	<400	<400	<400	160,000	<400	<400	990	120,000	NA	NA	NA	NA
	2/13/2007	20.78	6.76	14.02	<1,500^	<5,000	230	< 50	< 50	< 50	28,000	< 50	< 50	250	72,000	NA	NA	NA	NA
	5/15/2007	20.78	6.87	13.91	<3,000^	<7,000	690	< 70	120	< 70	35,000	< 70	< 70	370	32,000	NA	NA	NA	NA
	8/15/2007	20.78	8.08	12.70	<3,000^	<7,000	500	<70	< 70	< 70	20,000	<70	< 70	160	160,000	NA	NA	NA	NA
IS-3	2/22/2006	20.99	7.32	13.67	<4,000	29,000	2,700	820	1,100	2,900	750,000	<100	<100	3,400	40,000	<80,000	<1,000	<100	<100
	5/16/2006	20.99	7.86	13.13	8,000	<20,000	1,110	<200	450	< 200	300,000	<200	<200	1,600	65,000	<20,000	<2,000	<200	<200
	8/23/2006'	20.87	8.19	12.68	4,800	<50,000	2,900	< 500	1,100	660	970,000	< 500	< 500	3,900	54,000	<50,000	<5,000	< 500	< 500
	11/13/2006	20.87	8.03	12.84	NA	<200,000	2,800	<2,000	<2,000	<2,000	1,100,000	<2,000	<2,000	4,500	65,000	NA	NA	NA	NA
	2/13/2007	20.87	7.03	13.84	<3,000	<150,000	3,200	<1,500	<1,500	<1,500	600,000	<1,500	<1,500	3,300	49,000	NA	NA	NA	NA
	5/16/2007	20.87	7.17	13.70	<4,000^	<150,000	2,900	<1,500	<1,500	<1,500	630,000	<1,500	<1,500	3,400	88,000	NA	NA	NA	NA
	8/15/2007	20.87	8.43	12.44	<3,000^	<150,000	2,800	<1,500	<1,500	<1,500	960,000	<1,500	<1,500	4,300	98,000	NA	NA	NA -	NA

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	X	MTBE	DIPE	ETBE	TAME	TBA	Methanol			EDB
ID	Date	(feet)	(feet)	(feet)	(μg/L)	(μg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(μg/L)	(μg/L)	(µg/L)	(µg/L)	(μg/L)	(μg/L)	(μg/L)	(µg/L)	(μg/L)
ESL (µg/	L)				640	500	46	130	290	100	1,800				18,000		50,000	200	150
IS-4	2/22/2006	20.79	6.95	13.84	3,100	11,000	790	<100	120	<100	280,000	<100	<100	2,400	51,000	<10,000	<1,000	<100	<100
	5/16/2006	20.79	7.17	13.62	5,600	<15,000	610	<150	<150	<150	220,000	<150	<150	1,700	53,000	<15,000	<1,500	<150	<150
	8/23/2006	20.68	7.83	12.85	4,300	6,100	280	<40	<40	<40	270,000	<40	<40	1,600	100,000	<80,000++	<400	<40	<40
	11/13/2006	20.68	8.46	12.22	NA	<50,000	< 500	< 500	< 500	< 500	230,000	< 500	< 500	1,100	220,000	NA	NA	NA	NA
	2/13/2007	20.68	9.02	11.66	1,500	<25,000	380	<250	<250	<250	160,000	<250	<250	570	250,000	NA	NA	NA	NA
	5/15/2007	20.68	6.99	13.69	1,700	<25,000	<250	<250	<250	<250	150,000	<250	<250	820	260,000	NA	NA	NA	NA
	8/15/2007	20.68	8.05	12.63	1,000	<15,000	<150	<150	<150	<150	85,000	<150	<150	360	280,000	NA	NA	NA	NA
IS-5	2/22/2006	21.02	7.17	13.85	35,000	66,000	4,100	<250	3,100	7,700	420,000	<250	<250	4,600	40,000	<25,000	<2,500	<250	<250
	5/16/2006	21.02	6.81	14.21	11000+	33,000	2,800	< 200	1,700	1,900	350,000	<200	<200	3,400	29,000	<20,000	<2,000	<200	<200
	8/23/2006'	20.91	8.12	12.79	11,000	71,000	5,200	< 500	6,200	4,500	350,000	< 500	< 500	3,900	32,000	<50,000	<5,000	< 500	< 500
	11/13/2006	20.91	8.41	12.50	NA	<50,000	930	< 500	< 500	< 500	440,000	< 500	< 500	2,800	89,000	NA	NA	NA	NA
	2/13/2007	20.91	6.78	14.13	<5,000	<50,000	3,600	< 500	2,200	3,800	240,000	< 500	< 500	3,600	28,000	NA	NA	NA	NA
	5/16/2007	20.91	7.15	13.76	<5,000^	<50,000	4,500	< 500	< 500	< 500	200,000	< 500	< 500	2,700	24,000	NA	NA	NA	NA
	8/15/2007	20.91	8.32	12.59	<10,000^	<50,000	4,300	< 500	2,100	990	310,000	< 500	< 500	3,400	48,000	NA	NA	NA	NA
IS-6	2/22/2006	20.56	6.89	13.67	3,000	11,000	1,000	<100	560	180	130,000	<100	<100	1,400	210,000	<15,000	<1,000	<100	<100
	5/16/2006	20.56	6.44	14.12	3,300	<20,000	1,300	< 200	730	<200	96,000	<200	<200	1,300	260,000	<25,000	<2,500	<200	<200
	8/23/20061	20.47	7.69	12.78	2,900	<20,000	580	<200	< 200	<200	54,000	<200	<200	500	370,000	<20,000	<2,000	<200	<200
	11/13/2006	20.47	7.72	12.75	NA	<9,000	220	<90	<90	<90	20,000	<90	<90	170	260,000	NA	NA	NA	NA
	2/13/2007	20.47	6.12	14.35	1,600	<9,000	360	<90	<90	<90	28,000	<90	<90	210	310,000	NA	NA	NA	NA
	5/16/2007	20.47	6.67	13.80	1,700	9,100	1,400	< 70	300	<70	21,000	< 70	< 70	240	240,000	NA	NA	NA	NA
	8/15/2007	20.47	7.91	12.56	1,700	<9,000	560	<90	<90	<90	8,000	<90	<90	100	220,000	NA	NA	NA	NA

TABLE 2
GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	X	MTBE	DIPE	ETBE	TAME	TBA	Methanol	Ethanol	DCA	EDB
ID	Date	(feet)	(feet)	(feet)	(µg/L)	(μg/L)	(µg/L)	(μg/L)	(µg/L)	(μg/L)	(µg/L)	(µg/L)	(μg/L)	(µg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)
ESL (μg/	L)				640	500	46	130	290	100	1,800				18,000		50,000	200	150
EW-1	2/22/2006	21.74	8.06	13.68	3,200	<150,000	3,100	<1,500	<1,500	<1,500	700,000	<1,500	<1,500	5,100	59,000	<150,000	<15,000	<1,500	<1,500
	5/16/2006	21.74	7.97	13.77	1,600	<100,000	2,000	<1,000	<1,000	<1,000	630,000	<1,000	<1,000	4,700	57,000	<100,000	<10,000	<1,000	<1,000
	8/23/2006'	21.65	9.61	12.04	2,600	<150,000	2,200	<1,500	<1,500	<1,500	1,000,000	<1,500	<1,500	5,200	79,000	<150,000	<15,000	<1,500	<1,500
	11/13/2006	21.65	8.78	12.87	NA	<100,000	<1,000	<1,000	<1,000	<1,000	610,000	<1,000	<1,000	4,000	110,000	NA	NA	NA	NA
	2/13/2007	21.65	6.31	15.34	840	<70,000	1,200	< 700	< 700	< 700	530,000	< 700	< 700	2,500	100,000	NA	NA	NA	NA
	5/16/2007	21.65	8.13	13.52	1,500	<70,000	1,700	< 700	< 700	< 700	990,000	< 700	< 700	3,900	150,000	NA	NA	NA	NA
	8/16/2007	21.65	8.71	12.94	1,400	<80,000	1,900	<800	<800	<800	680,000	<800	<800	3,400	210,000	NA	NA	NA	NA
EW-2	2/22/2006	20.46	7.31	13.15	<3,000	10,000	1,800	<100	700	670	120,000	<100	<100	1,200	36,000	<80,000	<1,000	<100	<100
1211-2	5/16/2006	20.46	7.25		<3.000^	,	2,400	<250	1,110	880	180,000	<250	<250	1,400	45,000	<25,000	<2,500	<250	<250
	8/23/2006'	20.37	8.31	12.06	-,		1,600	<250	520	<250	120,000	<250	<250	930	35,000	<25,000	<2,500	<250	<250
	11/13/2006	20.37	8.18	12.19	NA	<10,000	610	<100	170	<100	60,000	<100	<100	380	25,000	NA	NA	NA	NA
	2/13/2007	20.37	7.15	13.22		•	1,100	<150	230	<150	81,000	<150	<150	700	49,000	NA	NA	NA	NA
	5/16/2007	20.37	7.74	12.63		,	1,700	<50	460	170	96,000	<50	<50	870	65,000	NA	NA	NA	NA
	8/16/2007	20.37	9.45		<2,000^		1,300		250	<150	100,000	<150	<150	700	75,000	NA	NA	NA	NA
	8/16/2007	20.37	9.43	10.92	<2,000	~13,000	1,300	~150	230	~130	100,000	~150	~150	/00	15,000	1411	1 42 1	1 17 1	

TABLE 2

GROUNDWATER ELEVATIONS AND GROUNDWATER SAMPLE ANALYTICAL RESULTS

Sample	Sample	TOC	DTW	GWE	TPH-d	TPH-g	В	T	E	X	MTBE	DIPE	ETBE		TBA	Methanol			EDB
ID	Date	(feet)	(feet)	(feet)	(µg/L)	(μg/L)	(μg/L)		- 14 - 17	(µg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L)	(μg/L) 200	(μg/L) 150
ESL (µg/	L)				640	500	46	130	290	100	1,800				18,000		50,000	200	130
Notes:																			
TOC	Top of well	casing 1	referenc	ed to arl	oitrary da	tum prior	to 3Q20)05											
DTW	Depth to wa	iter																	
MSL	Mean sea le																		
GWE	Groundwate																		
TPH-d	Total petrol	eum hyo	drocarbo	ons as di	esel by E	PA Metho	od 8015	(modifie	ed)										
TPH-g	Total petrol	eum hy	drocarbo	ons as g	asoline by	/ EPA Me	thod 82	60B											
BTEX	Benzene, to						Method	18260B											
MTBE	Methyl terti			-		3260B													
DIPE	Di-isopropy																		
ETBE	Ethyl tertian	-	•																
TAME	Tertiary am																		
TBA	Tertiary bu			PA Met	hod 8260	В													
DCA	1,2-Dichlor																		
EDB	1,2-Dibron	oethane	;					_				0.1.		c - F		n:	1 Water (Suality.	
ESL	Environme				r deep so	ils and gr	oundwa	ter is not	a curre	at or pote	ential source	ce of drin	king wate	er; San Fr	ancisco B	ay Kegiona	n water (Zuamy	
	Control Bo			05.															
(µg/L)	Micrograms																		
Date'	TOC was re	•	ed on S	eptembe	er 12, 200	16.													
NA	Not analyz																		
<#	Not detecte																		
J	Estimated of					3A ratio is	greater	than 20	to 1.										
	No samples		ed, no d	lata avai	lable														
	Not provid					_													
*	Laboratory				antitation	n range; cl	iromato	graphic p	pattern r	ot typica	i of fuel."								
**	Wells re-su							•											
^	The metho	d reporti	ing limi	t for TPI	I-d is inc	reased du	e to inte	rterence	from ga	solme-ra	nge hydro	carbons.	1	1 111	: 	tunical Di	and first		
^^	Petroleum Surrogate r	hydroca ecovery	rbons re for test	eported a method l	is TPH-d Mod. EP	do not ex 8015 wa	nibit a t s outsid	ypical Di e of conti	iesel chr rol limits	omatogra s. This n	am pattern ay indicat	; they have a bias in	ve a lowe the analy	r boiling j ysis due	point than	typicai Di	esei iuei		
+	to the samp	ole's mat	rix or a	n interfe	rence fro	m compoi	ınds pre	sent in the	he samp	le.									
++	The metho	d reporti	ing limi	t has bee	en increas	ed due to	the pres	sence of	an interf	ering con	npound.								

Well ID	Date	Dissolved Oxygen (DO)	Oxidation- Reduction Potential (ORP)	Total Iron	Measured Iron(II)	Calculated Iron(III)	pН	Temperature	Conductivity
		(mg/L)	(mV)	(mg/L)	(mg/L)	(mg/L)		(F)	(mS/cm)
IS-1	2/21/2006 (1)	3.06	228.10	3.30	3.30	0.0	6.92	63.68	1,090
	5/16/2006	NM	NM	NM	NM	NM	7.97	66.80	1,139
	8/23/2006	NM	NM	NM	NM	NM	6.83	71.83	1,257
	11/13/2006	NM	NM	NM	NM	NM	6.70	68.87	1,134
	2/15/2007	NM	NM	NM	NM	NM	6.95	59.10	848
	5/15/2007	NM	NM	NM	NM	NM	6.81	65.21	914
	8/15/2007	6.52	-161.70	NM	NM	NM	6.93	69.97	572
IS-2	2/21/2006 ^(t)	3.84	220.60	3.30	3.30	0.0	7.02	64.93	956
1,5-2	5/16/2006	NM	NM	NM	NM	NM	7.45	66.43	612
	8/23/2006	NM	NM	NM	NM	NM	7.34	71.34	1,012
	11/13/2006	NM	NM	NM	NM	NM	7.04	69.46	975
	2/15/2007	NM	NM	NM	NM	NM	6.80	59.43	436
	5/15/2007	NM	NM	NM	NM	NM	6.77	64.61	674
	8/15/2007	0.81	-110.30	NM	NM	NM	6.87	73.30	941
IS-3	2/21/2006 (1)	4.07	151.10	3.30	2.56	0.7	6.90	62.30	965
	5/16/2006	NM	NM	NM	NM	NM	7.56	64.60	1,164
	8/23/2006	NM	NM	NM	NM	NM	6.73	69.07	1,099
	11/13/2006	NM	NM	NM	NM	NM	2.24	66.27	1,056
	2/15/2007	NM	NM	NM	NM	NM	6.77	61.11	425
	5/16/2007	4.37	-73.70	NM	NM	NM	6.77	60.23	751
	8/16/2007	1.34	-114.80	NM	NM	NM	6.71	70.02	1,055
					• • •	0.5	. 0.5	(4.20	1.053
IS-4	2/21/2006 (1)	3.73	184.10	3.30	2.81	0.5	6.95	64.20 66.93	1,052 883
	5/16/2006	NM	NM	NM	NM	NM NM	7.22 6.75	74.00	1,068
	8/23/2006	NM	NM	NM NM	NM NM	NM NM	6.87	69.55	1,000
	11/13/2006	NM	NM NM	NM NM	NM	NM	6.81	61.98	813
	2/15/2007	NM NM	NM NM	NM	NM	NM	6.61	64.58	880
	5/15/2007	1.08	-67.40	NM	NM	NM	6.81	73.01	1,140
	8/16/2007	1.08	-07.40	14141	14141	11111	0.01	75.01	2,2.0
IS-5	2/21/2006 (1)	0.64	207.10	NM	NM	NM	6.77	63.56	1,031
	5/16/2006	NM	NM	NM	NM	NM	7.43	64.02	999
	8/23/2006	NM	NM	NM	NM	NM	6.69	68.77	1,142
	11/13/2006	NM	NM	NM	NM	NM	-0.98	67.19	1,100
	2/15/2007	1.29	-70.77	3.27	3.20	0.07	6.69	60.62	411
	5/16/2007	1.83	-65.70	NM	NM	NM	6.62	59.82	353
	8/16/2007	2.74	-76.90	NM	NM	NM	6.79	67.47	1,075

Well ID	Date	Dissolved Oxygen (DO)	Oxidation- Reduction Potential (ORP)	Total Iron	Measured Iron(II)	Calculated Iron(III)	pН	Temperature	Conductivity
		(mg/L)	(mV)	(mg/L)	(mg/L)	(mg/L)		(F)	(mS/cm)
IS-6	2/21/2006 (1)	4.05	198.70	3.30	2.46	0.8	6.94	64.00	1,092
10 0	5/16/2006	NM	NM	NM	NM	NM	8.35	67.29	1,120
	8/23/2006	NM	NM	NM	NM	NM	6.67	71.82	1,149
	11/13/2006	NM	NM	NM	NM	NM	7.08	69.35	1,088
	2/15/2007	NM	NM	NM	NM	NM	6.80	60.56	862
	5/16/2007	2.47	-94.70	NM	NM	NM	6.67	61.54	558
	8/16/2007	1.61	-97.00	NM	NM	NM	6.72	72.01	1,047
MW-1	2/21/2006 (1)	3.44	203.20	3.30	2.65	0.7	6.94	63.59	1,011
	5/16/2006	NM	NM	NM	NM	NM	7.96	66.24	1,023
	8/23/2006	NM	NM	NM	NM	NM	6.92	72.10	1,116
	11/13/2006	NM	NM	NM	NM	NM	7.50	68.50	1,013
	2/15/2007	NM	NM	NM	NM	NM	7.00	58.48	356
	5/15/2007	NM	NM	NM	NM	NM	7.29	63.93	661
	8/15/2007	2.17	-93.10	NM	NM	NM	7.10	69.50	854
MW-2	2/21/2006 (1)	3.29	205.90	3.30	3.01	0.3	6.74	62.44	1,038
	5/16/2006	NM	NM	NM	NM	NM	7.42	62.74	981
	8/23/2006	NM	NM	NM	NM	NM	6.70	65.08	1,036
	11/13/2006	NM	NM	NM	NM	NM	0.44	64.64	1,011
	2/15/2007	NM	NM	NM	NM	NM	6.77	60.79	765
	5/16/2007	1.18	-105.30	NM	NM	NM	6.63	59.76	361
	8/16/2007	3.57	-105.30	NM	NM	NM	6.74	63.91	789
MW-3	2/21/2006 (1)	3.55	209.60	1.08	0.95	0.1	6.89	66.20	870
	5/16/2006	NM	NM	NM	NM	NM	8.36	67.43	877
	8/23/2006	NM	NM	NM	NM	NM	6.93	71.69	908
	11/13/2006	NM	NM	NM	NM	NM	6.68	70.25	837
	2/15/2007	NM	NM	NM	NM	NM	6.94	60.52	667
	5/15/2007	NM	NM	NM	NM	NM	6.67	62.99	687
	8/15/2007	5.16	-182.30	NM	NM	NM	6.83	69.41	823
MW-4	2/21/2006 (1)	3.13	228,80	3.30	3.30	0.0	6.83	62.09	1,051
	5/16/2006	NM	NM	NM	NM	NM	7.63	63.42	1,045
	8/23/2006	NM	NM	NM	NM	NM	6.70	68.65	1,245
	11/13/2006	NM	NM	NM	NM	NM	1.12	66.55	1,235
	2/15/2007	1.05	-50.80	3.20	3.14	0.06	6.78	58.58	868
	5/16/2007	2.21	-118.80	NM	NM	NM	6.72	60.40	534
	8/16/2007	3.87	-133.00	NM	NM	NM	6.81	67.44	1,194
MW-4D	2/21/2006 (1)	5.94	187.40	0.11	0.00	0.1	7.08	64.43	830
	5/16/2006	NM	NM	NM	NM	NM	8.10	65.94	745
	8/23/2006	NM	NM	NM	NM	NM	7.12	65.49	794
	11/13/2006	NM	NM	NM	NM	NM	7.81	65.31	920
	2/15/2007	NM	NM	NM	NM	NM	7.30	60.21	609
	5/15/2007	NM	NM	NM	NM	NM	7.37	64.02	632
	8/15/2007	6.07	69.00	NM	NM	NM	7.12	65.89	741

MW-5 2/21/2006 0 3.90	Well ID	Date	Dissolved Oxygen (DO)	Oxidation- Reduction Potential (ORP)	Total Iron	Measured Iron(II)	Calculated Iron(III)	рН	Temperature	Conductivity
S162006 NM NM NM NM NM NM 7.50 69.62 890			(mg/L)	(mV)	(mg/L)	(mg/L)	(mg/L)		(F)	(mS/cm)
S16/2006 NM NM NM NM NM NM C12 T3.21 1.127	MW-5	2/21/2006 (1)		241.50	3.13	2.28	0.9	6.84	63.34	978
8/23/2006 NM			NM	NM	NM	NM	NM	7.50	69.62	890
11/13/2006 NM				NM	NM	NM	NM	6.72	73.21	1,127
2/15/2007 NM				NM	NM	NM	NM	1.25	68.95	1,098
S/16/2007				NM	NM	NM	NM	6.84	59.32	
MW-5D 2/21/2006 1.24 -148.40 NM NM NM NM 6.78 70.42 1.074				-75.90	NM	NM	NM	6.68	62.87	490
MW-5D 2/21/2006				-148.40	NM	NM	NM	6.78	70.42	1,074
STIG/2006 NM NM NM NM NM NM 8.02 67.45 770										
8/23/2006 NM NM NM NM NM NM 8.02 65.97 915 2/15/2007 NM NM NM NM NM NM NM 7.07 65.30 620 8/15/2007 6.74 50.10 NM NM NM NM 7.07 65.30 620 8/15/2007 6.74 50.10 NM NM NM NM 7.07 65.30 620 8/15/2006 NM NM NM NM NM NM 7.07 65.30 620 8/15/2006 NM NM NM NM NM NM 7.07 65.30 620 8/23/2006 NM NM NM NM NM NM 7.00 67.40 440 MW-6 2/21/2006 NM NM NM NM NM NM NM 8.06 67.14 1,126 8/23/2006 NM NM NM NM NM NM 7.01 70.80 1,193 11/13/2006 NM NM NM NM NM NM 7.08 70.20 1,174 2/15/2007 NM NM NM NM NM NM 6.93 62.30 802 5/15/2007 NM NM NM NM NM NM 6.93 62.30 802 5/15/2007 NM NM NM NM NM NM 6.98 70.28 1,081 MW-7 2/21/2006 NM NM NM NM NM NM 6.78 64.05 872 8/15/2007 NM NM NM NM NM NM 6.85 67.06 823 8/23/2006 NM NM NM NM NM NM 6.85 70.28 1,081 MW-7 2/21/2006 NM NM NM NM NM NM 6.96 70.91 1,616 11/13/2006 NM NM NM NM NM NM 6.96 70.91 1,616 11/13/2006 NM NM NM NM NM NM 6.83 69.25 1,511 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.83 69.25 1,511 MW-8 2/21/2006 NM NM NM NM NM NM NM 1.18 66.05 1,347 2/15/2007 NM NM NM NM NM NM NM 6.83 69.25 1,511 MW-8 2/21/2006 NM NM NM NM NM NM NM 1.18 66.05 1,347 2/15/2007 1.07 -70.50 3.25 3.19 0.06 6.83 61.15 976 5/16/2006 NM NM NM NM NM NM NM 1.18 66.05 1,347 2/15/2007 1.05 -95.50 NM NM NM NM NM 7.48 63.35 65 EW-1 2/21/2006 NM NM NM NM NM NM NM 1.18 66.05 1,347 2/15/2007 1.05 -95.50 NM NM NM NM NM 7.48 63.35 65	MW-5D	2/21/2006 (1)	4.23	222.00	0.09	0.00		7.21		
11/13/2006 NM NM NM NM NM NM NM 8.02 65.97 915 2/15/2007 NM NM NM NM NM NM 7.17 59.25 576 5/15/2007 NM NM NM NM NM NM 7.17 59.25 576 5/15/2007 NM NM NM NM NM NM 7.17 65.30 620 8/15/2007 NM NM NM NM NM NM 7.20 67.40 440 MW-6 2/21/2006 NM NM NM NM NM NM 8.06 67.14 1,126 8/23/2006 NM NM NM NM NM NM 7.01 70.80 1,193 11/13/2006 NM NM NM NM NM NM 7.01 70.80 1,193 11/13/2006 NM NM NM NM NM NM NM 6.06 67.14 2/15/2007 NM NM NM NM NM NM NM 6.78 64.05 872 8/15/2007 NM NM NM NM NM NM 6.89 70.28 1,081 MW-7 2/21/2006 NM NM NM NM NM NM 6.89 70.28 1,081 MW-7 2/21/2006 NM NM NM NM NM NM NM 6.89 70.91 1,616 11/13/2006 NM NM NM NM NM NM 6.96 70.91 1,616 11/13/2006 NM NM NM NM NM NM 6.83 69.25 1,596 2/15/2007 NM NM NM NM NM NM 6.83 69.25 1,591 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.83 69.25 1,591 8/15/2007 NM NM NM NM NM NM NM 6.83 69.25 1,591 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.83 69.25 1,591 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.83 69.25 1,591 8/15/2007 NM NM NM NM NM NM NM 6.83 69.25 1,591 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.83 69.25 1,511 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.83 69.25 1,511 MW-8 2/21/2006 NM NM NM NM NM NM NM 6.88 65.6 1,384 11/13/2006 NM NM NM NM NM NM NM 6.88 65.6 1,384 11/13/2006 NM NM NM NM NM NM NM 6.78 68.56 1,384 11/13/2006 NM NM NM NM NM NM NM 6.78 68.56 1,384 11/13/2006 NM NM NM NM NM NM NM 6.78 68.56 1,384 11/13/2006 NM NM NM NM NM NM NM 6.78 68.56 1,384 11/13/2006 NM NM NM NM NM NM NM 6.78 68.56 1,384 11/13/2006 NM NM NM NM NM NM NM 6.88 65.29 349 5/16/2006 NM NM NM NM NM NM NM NM 6.88 65.29 349 5/16/2007 1.46 -82.50 NM NM NM NM NM 6.76 61.10 2 506		5/16/2006	NM	NM	NM	NM	NM			
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S/16/2006 NM		8/15/2007	6.74	50.10	NM	NM	NM	7.20	67.40	440
S/16/2006 NM									< 1.27	1.060
8/23/2006 NM NM NM NM NM NM NM 7.01 70.80 1,193 11/13/2006 NM NM NM NM NM NM 7.08 70.20 1,174 21/15/2007 NM NM NM NM NM NM NM 6.93 62.30 802 5/15/2007 NM NM NM NM NM NM 6.78 64.05 872 8/15/2007 1.41 -105.20 NM NM NM NM 6.89 70.28 1,081 MW-7 2/21/2006 (1) 3.96 207.00 0.54 0.46 0.1 7.12 65.21 1,680 5/16/2006 NM NM NM NM NM NM 8.45 67.06 823 8/23/2006 NM NM NM NM NM NM 6.96 70.91 1,616 11/13/2006 NM NM NM NM NM NM 6.75 68.35 1,596 2/15/2007 NM NM NM NM NM NM 6.75 68.35 1,596 2/15/2007 NM NM NM NM NM NM 7.04 60.58 1,137 5/15/2007 NM NM NM NM NM NM NM 7.06 61.15 1,149 8/15/2007 7.98 -37.40 NM NM NM NM 6.83 69.25 1,511 MW-8 2/21/2006 (1) 3.40 214.50 3.30 3.12 0.2 6.85 63.40 1,205 5/16/2006 NM NM NM NM NM NM NM 6.83 69.25 1,511 MW-8 1/21/2006 NM NM NM NM NM NM NM 7.23 63.54 995 8/23/2006 NM NM NM NM NM NM NM 1.18 66.05 1,347 2/15/2007 1.07 -70.50 3.25 3.19 0.06 6.83 61.15 976 5/16/2007 1.07 -70.50 3.25 3.19 0.06 6.83 61.15 976 5/16/2007 1.05 -95.50 NM NM NM NM NM 6.69 62.73 1,179 5/16/2007 6.10 -24.00 NM NM NM NM NM 7.33 63.75 1,032 8/23/2006 NM NM NM NM NM NM NM 7.33 63.75 1,032 8/23/2006 NM NM NM NM NM NM NM NM 7.33 63.75 1,032 8/23/2006 NM NM NM NM NM NM NM NM 7.33 63.75 1,032 8/23/2006 NM NM NM NM NM NM NM NM 7.33 63.75 1,032 8/23/2006 NM NM NM NM NM NM NM NM 7.33 63.75 1,032 8/23/2006 NM NM NM NM NM NM NM NM 1.31 66.45 1,138 11/13/2006 NM NM NM NM NM NM NM NM 1.31 66.45 1,138 2/15/2007 1.46 -82.50 NM NM NM NM NM 1.31 66.65 1,245	MW-6									
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\$\frac{5}{16}(2006) \text{ NM} \t		(1)	2.06	207.00	0.54	0.46	0.1	7.12	65.21	1 680
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		8/16/2007	8.79	-107.20	NM	NM	NM	6.76	67.94	614

4301 San Leandro Street Oakland, California

Well ID	Date	Dissolved Oxygen (DO)	Oxidation- Reduction Potential (ORP)	Total Iron	Measured Iron(II)	Calculated Iron(III)	pН	Temperature	Conductivity
		(mg/L)	(mV)	(mg/L)	(mg/L)	(mg/L)		(F)	(mS/cm)
EW-2	2/21/2006 (1)	3.74	221.90	3.30	3.30	0.0	6.75	61.92	889
2	5/16/2006	NM	NM	NM	NM	NM	8.34	63.92	954
	8/23/2006	NM	NM	NM	NM	NM	6.68	68.12	982
	11/13/2006	NM	NM	NM	NM	NM	0.27	66.70	901
	2/15/2007	NM	NM	NM	NM	NM	6.77	60.40	741
	5/16/2007	1.03	-111.30	NM	NM	NM	6.62	59.54	155
	8/16/2007	5.64	-83.40	NM	NM	NM	6.76	66.14	934

Notes:

milligrams per liter millivolts mg/L mV

degrees Fahrenheit

mS/cm micro Siemens per centimeter

2/21/2006 sampling data represent the baseline geochemical conditions (1)

NM Not measured

ATTACHMENT A

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 downhole equipment is decontaminated prior to use.

Prior to gauging, purging, and sampling a well, caps for all on-site wells should be opened to allow atmospheric pressure to equalize if local groundwater is under confined or semi-confined conditions. 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. Floating separate-phase hydrocarbons (SPH) where suspected or observed will be 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 hydrocarbon sheen are sampled, unless otherwise specified by the project manager. Field observations of well integrity, water level, 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 discrete 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 purging volume intervals of one casing volume. Purging continues until three well casing volumes have been removed or until the well completely dewaters. Wells that dewater or demonstrate a slow recharge rate 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. Investigation-derived wastes (purge and rinseate water) is handled in one of three ways: 1) Purge and rinseate 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. 2) Purge and rinseate water is collected into a 250-gallon portable holding tank and transported to the Clearwater equipment yard in Point Richmond, CA. At the yard, the investigation-derived waste is then transferred to 55-gallon drums pending disposal at an appropriate disposal facility, or 3) Purge and rinseate water is collected in a 250-gallon portable holding tank and transported to the appropriate disposal facility. The applicable method will be indicated in the field log sheets and the corresponding technical report.

Groundwater Sample Collection

Groundwater samples are collected immediately after purging, with the following exception: If the purging rate exceeds well recharge rate, samples are collected 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 for sampling has accumulated. The well is sampled within 24 hours of purging or is re-purged. 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 laboratorysupplied containers, labeled, documented on a chain-of-custody form and placed on ice in a chilled cooler for transport to a state-certified analytical laboratory. Analytical detection limits match or surpass standards required by relevant local or regional guidelines.

Ouality 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 is put on prior to sampling each well.
- Wells are gauged and purged and groundwater samples are collected in the expected order of increasing degree of contamination based on historical analytical results.
- All purging equipment is 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 purgeable 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 that 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 standard groundwater samples are collected; they are analyzed for the same compounds in order to verify the reproducibility of laboratory data. They are usually collected from only 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 verify field handling and transportation procedures. Duplicates verify laboratory procedures. The configuration of QC samples is determined by Clearwater depending on site conditions and regulatory requirements.

ATTACHMENT B

CLEARWATER WELL GAUGING/PURGING CALCULATIONS GROUP DATA SHEET 229 Tewksbury Avenue, Date: Job No.: Location: Point Richmond, CA 94801 ZPOY6I Tel: (510) 307-9943 Fax: (510) 232-2823 4301 Son beandro St. Orkland CA Tech(s): Eric V. Aug for Drums on Site @ TOA/TOD Total number of DRUMS used for this event Rodney Borry Soil: O Water: Soil: Water: Well No. Diameter DTB DTW ST CV PV SPL Notes (in) ... (ft) (ft) (ft) (gal) (gal) (ft) 42.55 19.21 27.34 4.37 4.12 16.42 12.36. in. 24.53 2.39 24.89 8,07 MW-7 25.91 MW-3 11.81 11,23 Mar-6 14,55 15-2 2.76 17.23 **Explanation:** DTB = Depth to Bottom Conversion Factors (cf)

DTW = Depth to Water

ST = Saturated Thickness (DTB-DTW) must be > 1 foot

CV = Casing Volume (ST x cf)

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

SPL = Thickness of Separate Phase Liquid

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

6-inch diameter well cf = 1.44 gal.ft

Well No.	Diameter (in)	DTB (ft)	DTW (ft)	ST (ft)	CV (gal)	PV (gal)	e L	SPL (ft)		Notes
IS-4	2 in.	24.94	8.05	16.89	2.70	8.10			·	
7 6-6	2 in.	25.36	7.91	17.45	2.80	8.40	·		·	
<u> 15-3</u>	2 in.	24.26	8.43	15.83	2.53	7.57				
15-5	2 in.	14.33	8.22	6.01	0.76	2,88		· · · · · · · · · · · · · · · · · · ·		
=w-2	4 in.	25.21	9.45	15.76	10.24	30.72				
	2 in.	24.61	13.48	11.13	1.78	5.34				-
Mr-4	2 in.	24.48	7.03	15.49	2.47	7.41		, .		
MW-5	2 in.	25,54	7.99	17.59	2.81	8.43				
mu-8	2 in,	24.62	8-61	16.01	2.56	7.68				
56v-1	4 in.	25.12	8.71	16.41	10.67	3201		,		
						118.	000	con H	20	
-					1	+10.	6			

Explanation:

OTB = Depth to Bottom

DTW = Depth to Water

3T = Saturated Thickness (DTB-DTW) must be > 1 foot

CV = Casing Volume (ST x cf)

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

Job No.: ZPOYGI 430 San Leander St. Onklan Location: TIME WELL# VOL. (gal.) **ORP** CND (µ/cm) TMP (°F) DO (mg/L) рH Fe²⁺ Fe_T MW-50 Sample for: TBA/Saxis Calc. purge TPHE 8260 BIEX Metals Purging Method: PVC Bailer / Pump Disp. Bailer OM - No sheen and No Odor COMMENTS: color, turbidity, recharge, sheen, odor POST DEPTH TO WATER: SAMPLE TIME: Job No.: Location: Date: Tech: WELL# TIME VOL. (gal.) ORP CND (µ/cm) TMP (°F) DO (mg/L) Fe²⁺ pН Fer na-40 Sample for: TBA/5004 TPHg Calc. purge 8260 BTEX MTBE Metals Purging Method: PVC Bailer / Pump / Disp Bailer Brown, Modernte - OK, Slight Sheen, No Och COMMENTS: color, turbidity, recharge, sheen, odor POST DEPTH TO WATER: SAMPLE TIME:

PUR	GE	DATA	SHEET

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No.: ZF	846T	Location:	Onklan	of CA.	······································			Date:	8-15-07	Sheet 2 of T Tech: Eric VAng box
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	рН	Fe ²⁺	Fe_{τ}	Rodney Borry
'w- [10:52	2.00	-91.2	857	69.43	2.23	7.08	WA	NA	Sample for: 78#/502
c. purge	10:59	4.00	-92.3	856	69.51	2.21	7.10	1	/ (IPHg TPHd 8260
me <u>7.17</u>	11:04	7.00	-93.1	854	69.50	2.17	7.10	4	V	TEX MTBE Metals
	Purging Method	1:		PVC Bailer / Pu	ımp / Disp. Ba il	ir ir				'
	COMMENTS:	color, turbidity, r	echarge, sheen,	odor Lt.	Gray, M	indem le	- poor -	5/ig	htshee	n, 5/ight Odoc
	POST DEPTH	TO WATER:			9.80		<i>'</i>	SAMPLE TIMI		11:15.
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	pН	Fe ²⁺	Fe _T	
5-1	11:18	200	-168.2	575	69.76	6.64	6.90	3.19	328	Sample for: 80/5
c. purge	11:23	5.00	-164.7	574	69.82	6.51	6.91	1)	Sample for: Bol Solver TPHg TPHd 8260
me 8-07	11:30	8.00	761.7	572	69.97	6.52	6.93	1		BTEX MTBE Metals
	Purging Method	l:		PVC Bailer / Pu	mp / Disp. Baile					
	COMMENTS: c	color, turbidity, r	echarge, sheen, c	odor Gra	y Mode	rate, poo	or - H	no Slig	hy she	en, glight Oder
	POST DEPTH 1	ΓΟ WATER:			8.7	3		SAMPLE TIME		16:30

Clearwater Group, Inc. - 229 Tewksbury Avenue, Point Richmond, California 94801 Phone: (510) 307-9943 Fax: (510) 232-2823

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lob No.: ZPO	5467		0 41						_	Sheet	of 7
	•	Location:	OnHlow	of CA.	· .			Date: 8-	15-07	Tech: 7	outron berr
WELL#	TIME	VOL. (gal.)	ORP	CND (µ/cm)	TMP (°F)	DO (mg/L)	pН	Fe ²⁺	Fe _T	•	
MW-7	11:34	2.00	-36.8	1508	69.19	8.07	6.97	No	M	Sample for: The	Soxys
Calc. purge	11:42	4.00	-38.1	1510	69.21	7.99	6.81		/	True True	8260
olume 6.48	11:49	6.00	737.4	1511	69.25	7.98	6.83	1		BTEX MTBE	Metals
	Purging Method	l:		PVC Bailer / Pt	ımp / Oisp. Baile	\$					
	COMMENTS: c	olor, turbidity, r	echarge, sheen,	odor Bro	un, M	Poclerate	, OK	No 70	heen,	No Odor	
	POST DEPTH 1	O WATER:			12.50			SAMPLE TIME	•	12:0	0
ob No.:		Location:						Date:			
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	рН	Fe ²⁺	Fe _T	Tech:	
Mw-3	12:03	2.00	-180.6	822	69.32	5.25	6.87	NO	NA	Sample for: M	150xys
alc. purge		3.00	181.7	821	69.40	5.21	6.84	1.	1	7PHg TPHd	8260
olume <u>5.40</u>	12:16	5.00	182.3	823	69.41	5.16	6.83	V	1	BTEX MTBE	Metals
	Purging Method	•	·	PVC Bailer / Pu							
	COMMENTS: c	olor, turbidity, re	charge, sheen,	odor Gra	High	1 , poo	r - 1	o sheer	56	ght Odo	
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b No.: 2 PC	PYGE	Location:	Onklan	el, CA				Date: 8	105/07	Sheet 4 of Tech: Rodn	laastin ZUBUT
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	pН	Fe ²⁺	Fe _T		-7 ,
Mbr-6	12:34	2.00	-102.8	1083	70.31	151	6.90	NA	NA	Sample for: TM 50	oxys
lc. purge	12:40	4.00	-103.4	1081	70.21	1.40	6.92	\int_{I}	1	TPHg TPHD 82	:60
ume 6.99	12:47	7.00	-105.2	1081	70,28	1.41	6.89	W		BTEX MTPE M	etals
	Purging Method	1 :		PVC Bailer / Pu	ımp/Disp. Baile	3				•	
	COMMENTS:	color, turbidity, r	echarge, sheen,	odor Lt.	Gray,	Modern	te, pou	or - t	Yas sh	een, HAS Od	lor
	POST DEPTH	TO WATER:			10.98			_SAMPLE TIM		1300	
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	рН	Fe ²⁺	$\mathbf{Fe_T}$		
3-2	13:05	2.00	109,2	944	73.22	0.83	6.85	M	WA	Sample for: 780/50	xy's
c. purge	13:11	5.00	109,8	942	73.21	0.87	6.83	1	1	TPHd 820	60
ıme 8.28	13:18	8.00	710.3	941	73.30	0.81	6.87	4	4	BTEX MTBE ME	etals
	Purging Method	! :		PVC Bailer / Pu	mp /Disp. Baile	>					<u>-</u>
	COMMENTS: o	color, turbidity, re	echarge, sheen, o	odor Gra	y, Mod	levate,	poor-	has	Sheen	& Odor	
	POST DEPTH	TO WATER:			6.3	/		SAMPLE TIME	E:	13:30	

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U-/Danadus -- LAA

Job No.: ZP	046 I	Location:	Oak	and, C	A.			Date: 5	1///0=	7	ve V. Aushy
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	рН	Fe ²⁺	Fe _T	Tech: 0	runey Bo
I5-4	8:47	2.00	-66.3	1141	73.04	1.15	6.83	1.73	3.24	Sample for: 761	150xy's
Calc. purge	8.55	5.00	768.2	1140	73.63	1.09	6.81	1	7	PPHg TPHd	8260
volume <i>8.10</i>	9:02	8.00	67.4	1140	73.01	1.08	6.81	V	1	BTEX MTB	Metals
	Purging Method	d:		PVC Bailer / Pu	mp Disp. Baile						
	COMMENTS:	color, turbidity, r	echarge, sheen,	odor Gra	7, Mode	vale, l	PK - ;	Slights	heen	slight o) Jor
	POST DEPTH	TO WATER:			7.	01		SAMPLE TIME	·. ·	9115	
Job No.:		Location:						Detail			
Job No.: WELL#	TIME	Location: VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	pH	Date:	Fe _T	Tech:	
	TIME 9.'20		ORP -95,2	CND (µ/cm)	TMP (°F)	DO (mg/L)	рн 6.74	Date: Fe ²⁺ ~	Fe _{r_} 3 28	Tech:	5 ax vie
WELL#	9:20	VOL. (gal.)		CND (µ/cm) /048	-70	DO (mg/L) 1.86 1.72	174	Fe ²⁺ _	3.28		5 ox 45 8260
WELL# I 5-6 Calc. purge	9:20	VOL. (gal.)	-95.2	CND (µ/cm) 1048 1047	-70	1.86	6.74	Fe ²⁺ _	2	Sample for:	5 ox 45 8260 Metals
WELL# IS-6 Calc. purge	9:20 9:26	VOL. (gal.) 2.00 5,00 8,00	-95.2 -95.8 -77.0	CND (µ/cm) 1048 1047 PVC Bailer / Pur	72.02 72.00 72.01	1.86 1.72 1.61	6.74	Fe ²⁺ _	2	Sample for: That	
WELL# IS-6 Calc. purge	9:20 9:26 9:31	VOL. (gal.) 2.00 5,00 6,00	-95.2 -95.8 -77.0	1048 1047 PVC Bailer / Pu	72.02 72.00 72.01	1.86 1.72 1.61	6.74 6.74 6.72	Fe ²⁺ ~	2	Sample for: THAT TPHG TPHG BIEX MIBE	

PURGE DATA SHEET No.: ZPOY6I Oakland, CA. Location: Date: WELL# TIME VOL. (gal.) ORP CND (µ/cm) TMP (°F) Fe²⁺ DO (mg/L) рH Fe_T Sample for: / TPHg TPHd 8260 c. purge 9.00 BTEX Metals Purging Method: PVC Bailer / Pump (Disp. Baile) TAN Moderate OR - No gheen, COMMENTS: color, turbidity, recharge, sheen, odor 0:00 POST DEPTH TO WATER: SAMPLE TIME: WELL# TIME VOL. (gal.) ORP CND (µ/cm) Fe²⁺ TMP (°F) DO (mg/L) рH Fe_T 55-5 Sample for: The TPHg 8260 c. purge (BTEX MTBE Metals Purging Method: PVC Bailer / Pump / Disp. Bailer

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COMMENTS: color, turbidity, recharge, sheen, odor

POST DEPTH TO WATER:

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- HAS sheen , & Flag Odor

SAMPLE TIME:

Job No.: 2/	2646t.	Location:	Dakla	ol. C	A.		·	Date:	1/6/07	Sheet /	of Augli
WELL#	TIME	VOL. (gal.)	ORP	CND (μ/cm)	TMP (°F)	DO (mg/L)	pН	Fe ²⁺	Fe _T	Tech: //9	Odney Be
EW-2	10:16	10.00	-79.7	925	66.40	6.44	6.78	NA	WA	Sample for: The	150xx1
Calc. purge	10:26	20.00	82.1	930	66.52	5.81	6.77		1	TPHe TPHO	8260
volume <u>20.7</u> 2	10:38	31,00	-83.4	934	66.14	5.64	6.76			STEX MIDE	Metals
	Purging Method	1:		PVC Bailer / Pt	ump Disp Baile	•		· ·			
	COMMENTS:	color, turbidity, r	echarge, sheen, o	odor Tan,	Malera	k, Poor	^ - 1	MAS 50	heen 4	Odor	
	POST DEPTH	:			23.1	12		SAMPLE TIM		10'4	,5
lob No.:		T anathra.									
		Location:	<u> </u>					D.4			
WELL#	TIME	VOL. (gal.)	ORP	CND (µ/cm)	TMP (°F)	DO (mg/L)	pН	Date:	Fe _T	Tech:	
WELL#	10:48		ORP	CND (µ/cm)	TMP (°F)	DO (mg/L)	pH 6.74		Fe _T		50×5
	10:48 10:51	VOL. (gal.)	ORP -103.7 -104.9	783	TMP (°F) 6364 63.80	140	рн 6.74 6.74	Fe ²⁺	T	Sample for: TPH	50x, s 8260
Mb- 2	10:48	VOL. (gal.)	-103.7	783	6364	6.47	6.79	Fe ²⁺	T	Sample for: 734/	
MW 2 Calc. purge	10:48	VOL. (gal.) 1.00 3.00 5.00	-103.7 -104.9 -105.3	783 786 789	6364	6.47 4.88 3.57	6.79	Fe ²⁺	T	Sample for: 784	8260
Mw 2 Calc. purge olume 5.34	10:48 10:51 10:59	VOL. (gal.) 1.00 3.00 5.00	-103.7 -104.9 -105.3	783 786 789 PVC Bailer / Pu	63.69 63.80 63.91	6.47 4.88 3.57	6.79 6.79 6.74	Fe ²⁺ NA	T	Sample for: 734	8260

PURGE DATA SHEET Dollan. b No.: Location: Date: WELL# TIME ORP VOL. (gal.) CND (µ/cm) DO (mg/L) TMP (°F) Fe²⁺ рH Fe_{τ} Sample for: TPHg TPHd lc. purge 8260 BTEX ... MTBE Metals Purging Method: PVC Bailer / Pump Disp. Bailer COMMENTS: color, turbidity, recharge, sheen, odor 11:15 POST DEPTH TO WATER: SAMPLE TIME: WELL# TIME VOL. (gal.) ORP CND (µ/cm) TMP (°F) Fe²⁺ DO (mg/L) pН Fe_T Sample for: That TPHg c. purge 8260 BTEX MTBE Metals Purging Method: PVC Bailer / Pump / Disp. Bailer COMMENTS: color, turbidity, recharge, sheen, odor Lt. Gyaz, low, On - No sheen - 5/19hx odo-POST DEPTH TO WATER: SAMPLE TIME:

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	TURGE DATA SHEET										
	7 D= U/T	-	\mathcal{O}	41 2	/ / ^				(1/	Sheet	of They
	POYET	Location:	<u> </u>	Kland	<u> (/ H</u>			Date: 8/	16/07	Tech: Ro	Jac Ben
WELL#	TIME	VOL. (gal.)	ORP	CND (µ/em)	TMP (°F)	DO (mg/L)	pН	Fe ²⁺	Fe _T	•	/ /
MW-7	11:57	2.00	-33.3	66	63.33	6.65	7.49	3.30	3.30	Sample for: That	Saris
Calc. purge	12:02	4.00	-24.2	65	13.34	612	7.48	1.		TPHg TPHd	8260
volume 7.68	12:09	6.00	-24.0	65	63.35	6.10	7.48	W	<i>\(\psi\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</i>	BTEX: MTBE	Metals
	Purging Method	l:		PVC Bailer / Pt	ımp Disp. Baile	er					
	COMMENTS:	color, turbidity, r	echarge, sheen, o	odor Gra	7 Mod	low to	Poor,	HAG	sheen	90dor	
	POST DEPTH	TO WATER:			8.	90		SAMPLE TIMI	3:	12:15)
Job No.:	. !	Location:						Date:	•	Tech:	
WELL#	TIME	VOL. (gal.)	ORP	CND (µ/cm)	TMP (°F)	DO (mg/L)	pН	Fe ²⁺	Fe _T		
EW-1	12:25	10,00	109.3	616	67.84	8.43	6.78	NA	NA	Sample for: [Ba]	15 oxy
Calc. purge	12:35	20,00	109,7	615	67.87	868	6.78			TPHg TPHe	8260
volume <u>32.0/</u>	12:50	3200	107.2	614	67.94	8.79	6.76	Y	W	BTEX MTBE	Metals
	Purging Method	:		PVC Bailer / Pu	mp Disp. Baile	₹					
	COMMENTS:	olor, turbidity, r	echarge, sheen, o	odor Gra	y, Hig	4 , poo	er 94	109 36	ecn 4	Odor	
· .	POST DEPTH	O WATER:			24.	81	······································	SAMPLE TIME	B:	13:00	

ATTACHMENT C



Date: 8/27/2007

Karel Detterman Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801

Subject: 8 Water Samples

Project Name: NAZ EAGLE GAS STATION

Project Number: ZP0461

Dear Ms. Detterman,

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,



Project Number : **ZP046I**

Matrix: Water

Lab Number: 58075-01

Report Number: 58075

Date: 8/27/2007

Sample Date :8/15/2007

Sample: MW-5D

Sample Date :8/15/2007	Measured	Method Reporting		Analysis	Date
Parameter	Value	Limit	Units	Method	<u>Analyze</u> d
Benzene	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	8/21/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	8/21/2007
Toluene - d8 (Surr)	94.0		% Recovery	EPA 8260B	8/21/2007
4-Bromofluorobenzene (Surr)	95.0		% Recovery	EPA 8260B	8/21/2007
TPH as Diesel	330	50	ug/L	M EPA 8015	8/22/2007
(Note: Discrete peaks in Diesel range, atyp	ical for Diesel	Fuel.)			
Octacosane (Diesel Surrogate)	126		% Recovery	M EPA 8015	8/22/2007

Approved By:

Joel Kiff



Project Number: ZP046I

Sample: MW-4D Matrix: Water Lab Number: 58075-02

Sample Date :8/15/2007 Method Analysis Method Measured Reporting Date Units Analyzed Limit Value **Parameter** < 0.50 0.50 ug/L **EPA 8260B** 8/21/2007 Benzene **EPA 8260B** 8/21/2007 0.50 ug/L < 0.50 Toluene **EPA 8260B** 8/21/2007 0.50 ua/L < 0.50 Ethylbenzene 8/21/2007 ug/L **EPA 8260B** < 0.50 0.50 **Total Xylenes EPA 8260B** 8/21/2007 < 0.50 0.50 ua/L Methyl-t-butyl ether (MTBE) 8/21/2007 0.50 ug/L **EPA 8260B** Diisopropyl ether (DIPE) < 0.50 0.50 ug/L **EPA 8260B** 8/21/2007 < 0.50 Ethyl-t-butyl ether (ETBE) 8/21/2007 0.50 ug/L **EPA 8260B** < 0.50 Tert-amyl methyl ether (TAME) **EPA 8260B** 8/21/2007 < 5.0 5.0 ug/L **Tert-Butanol EPA 8260B** 8/21/2007 50 ug/L < 50 **TPH** as Gasoline 8/21/2007 % Recovery EPA 8260B 93.0 Toluene - d8 (Surr) 8/21/2007 95.9 % Recovery EPA 8260B 4-Bromofluorobenzene (Surr) 8/22/2007 ug/L M EPA 8015 **TPH as Diesel** 130 50 (Note: Discrete peaks in Diesel range, atypical for Diesel Fuel.) % Recovery M EPA 8015 8/22/2007 126 Octacosane (Diesel Surrogate)

Approved By:

Joel Kiff

Report Number: 58075

Date: 8/27/2007



NAZ EAGLE GAS STATION Project Name:

Project Number: ZP046I

Lab Number: 58075-03 Matrix: Water Sample: MW-1

Sample Date :8/15/2007 Method Measured Analysis Date Reporting Method Units Analyzed Value Limit **Parameter** 8/21/2007 **EPA 8260B** < 10 10 ug/L Benzene 8/21/2007 **EPA 8260B** < 10 10 ug/L Toluene **EPA 8260B** 8/21/2007 ug/L < 10 10 Ethylbenzene 8/21/2007 10 ug/L **EPA 8260B** < 10 **Total Xylenes EPA 8260B** 8/21/2007 230 10 ug/L Methyl-t-butyl ether (MTBE) **EPA 8260B** 8/21/2007 10 ug/L < 10 Diisopropyl ether (DIPE) **EPA 8260B** 8/21/2007 < 10 10 ug/L Ethyl-t-butyl ether (ETBE) 8/21/2007 10 ug/L **EPA 8260B** < 10 Tert-amyl methyl ether (TAME) 8/21/2007 **EPA 8260B** 50 ug/L 34000 **Tert-Butanol EPA 8260B** 8/21/2007 1000 ug/L < 1000 **TPH** as Gasoline 8/21/2007 % Recovery **EPA 8260B** 97.3 Toluene - d8 (Surr) **EPA 8260B** 8/21/2007 100 % Recovery 4-Bromofluorobenzene (Surr) M EPA 8015 8/22/2007 50 ug/L 1000 **TPH as Diesel** M EPA 8015 8/22/2007 130 % Recovery Octacosane (Diesel Surrogate)

Approved By:

Report Number: 58075

Date: 8/27/2007



Date: 8/27/2007

Project Name: NAZ EAGLE GAS STATION

Project Number: **ZP0461**

Sample: IS-1

Matrix: Water

Lab Number: 58075-04

Sample Date :8/15/2007

Sample Date :8/15/2007		Method			
Parameter	Measured Value	Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	< 40	40	ug/L	EPA 8260B	8/20/2007
Toluene	< 40	40	ug/L	EPA 8260B	8/20/2007
Ethylbenzene	< 40	40	ug/L	EPA 8260B	8/20/2007
Total Xylenes	< 40	40	ug/L	EPA 8260B	8/20/2007
Methyl-t-butyl ether (MTBE)	4200	40	ug/L	EPA 8260B	8/20/2007
Diisopropyl ether (DIPE)	< 40	40	ug/L	EPA 8260B	8/20/2007
Ethyl-t-butyl ether (ETBE)	< 40	40	ug/L	EPA 8260B	8/20/2007
Tert-amyl methyl ether (TAME)	< 40	40	ug/L	EPA 8260B	8/20/2007
Tert-Butanol	90000	200	ug/L	EPA 8260B	8/20/2007
TPH as Gasoline	< 4000	4000	ug/L	EPA 8260B	8/20/2007
Toluene - d8 (Surr)	98.0		% Recovery	EPA 8260B	8/20/2007
4-Bromofluorobenzene (Surr)	89.3		% Recovery	EPA 8260B	8/20/2007
TPH as Diesel	2700	50	ug/L	M EPA 8015	8/22/2007
Octacosane (Diesel Surrogate)	121		% Recovery	M EPA 8015	8/22/2007

Approved By:



Project Number: ZP046I

Matrix : Water

Lab Number: 58075-05

Report Number: 58075

Date: 8/27/2007

Sample Date :8/15/2007

Sample: MW-7

Sample Date .0/10/2007	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Parameter					
Benzene	< 90	90	ug/L	EPA 8260B	8/21/2007
Toluene	< 90	90	ug/L	EPA 8260B	8/21/2007
Ethylbenzene	< 90	90	ug/L	EPA 8260B	8/21/2007
Total Xylenes	< 90	90	ug/L	EPA 8260B	8/21/2007
Methyl-t-butyl ether (MTBE)	37000	90	ug/L	EPA 8260B	8/21/2007
Diisopropyl ether (DIPE)	< 90	90	ug/L	EPA 8260B	8/21/2007
Ethyl-t-butyl ether (ETBE)	< 90	90	ug/L	EPA 8260B	8/21/2007
Tert-amyl methyl ether (TAME)	170	90	ug/L	EPA 8260B	8/21/2007
Tert-Butanol	160000	500	ug/L	EPA 8260B	8/21/2007
TPH as Gasoline	< 9000	9000	ug/L	EPA 8260B	8/21/2007
Toluene - d8 (Surr)	98.4		% Recovery	EPA 8260B	8/21/2007
4-Bromofluorobenzene (Surr)	89.3		% Recovery	EPA 8260B	8/21/2007
TPH as Diesel	390	50	ug/L	M EPA 8015	8/22/2007
Octacosane (Diesel Surrogate)	126		% Recovery	M EPA 8015	8/22/2007

Approved By:

Joel Kiff



Date: 8/27/2007

Project Name: NAZ EAGLE GAS STATION

Project Number: ZP046I

Sample: MW-3 Matrix: Water Lab Number: 58075-06

Sample Date :8/15/2007

Sample Date :8/15/2007		Method			
	Measured	Reporting		Analysis	Date
Parameter	Value	Limit	Units	Method	<u>Analyze</u> d
Benzene	42	40	ug/L	EPA 8260B	8/20/2007
Toluene	< 40	40	ug/L	EPA 8260B	8/20/2007
Ethylbenzene	< 40	40	ug/L	EPA 8260B	8/20/2007
Total Xylenes	< 40	40	ug/L	EPA 8260B	8/20/2007
Methyl-t-butyl ether (MTBE)	4500	40	ug/L	EPA 8260B	8/20/2007
Diisopropyl ether (DIPE)	< 40	40	ug/L	EPA 8260B	8/20/2007
Ethyl-t-butyl ether (ETBE)	< 40	40	ug/L	EPA 8260B	8/20/2007
Tert-amyl methyl ether (TAME)	< 40	40	ug/L	EPA 8260B	8/20/2007
Tert-Butanol	64000	200	ug/L	EPA 8260B	8/20/2007
TPH as Gasoline	< 4000	4000	ug/L	EPA 8260B	8/20/2007
Toluene - d8 (Surr)	98.7	•	% Recovery	EPA 8260B	8/20/2007
4-Bromofluorobenzene (Surr)	87.3		% Recovery	EPA 8260B	8/20/2007
TPH as Diesel	< 200	200	ug/L	M EPA 8015	8/23/2007
(Note: MRL increased due to interference fr	om Gasoline-r	ange hydrod	arbons.)		
Octacosane (Diesel Surrogate)	106		% Recovery	M EPA 8015	8/23/2007

Approved By:

Joel Kiff



Project Number: **ZP046**

Matrix: Water

Lab Number: 58075-07

Report Number: 58075

Date: 8/27/2007

Sample Date :8/15/2007

Sample: MW-6

Sample Date :8/15/2007		Method			
Parameter	Measured Value	Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	1300	20	ug/L	EPA 8260B	8/21/2007
Toluene	< 20	20	ug/L	EPA 8260B	8/21/2007
Ethylbenzene	< 20	20	ug/L	EPA 8260B	8/21/2007
Total Xylenes	< 20	20	ug/L	EPA 8260B	8/21/2007
Methyl-t-butyl ether (MTBE)	7000	20	ug/L	EPA 8260B	8/21/2007
Diisopropyl ether (DIPE)	< 20	20	ug/L	EPA 8260B	8/21/2007
Ethyl-t-butyl ether (ETBE)	< 20	20	ug/L	EPA 8260B	8/21/2007
Tert-amyl methyl ether (TAME)	32	20	ug/L	EPA 8260B	8/21/2007
Tert-Butanol	69000	150	ug/L	EPA 8260B	8/21/2007
TPH as Gasoline	4000	2000	ug/L	EPA 8260B	8/21/2007
Toluene - d8 (Surr)	92.2		% Recovery	EPA 8260B	8/21/2007
4-Bromofluorobenzene (Surr)	95.5		% Recovery	EPA 8260B	8/21/2007
TPH as Diesel	2900	50	ug/L	M EPA 8015	8/25/2007
Octacosane (Diesel Surrogate)	101		% Recovery	M EPA 8015	8/25/2007

Approved By:



NAZ EAGLE GAS STATION Project Name :

Project Number: ZP046I

Sample: IS-2		Matrix : \	Nater	Lab Number :	58075-08
Sample Date :8/15/2007		Method			
Parameter	Measured Value	Reporting Limit	Units	Analysis Method	Date Analyzed

Matrix: Water

i alametei					
Benzene	500	70	ug/L	EPA 8260B	8/21/2007
Toluene	< 70	70	ug/L	EPA 8260B	8/21/2007
Ethylbenzene	< 70	70	ug/L	EPA 8260B	8/21/2007
Total Xylenes	< 70	70	ug/L	EPA 8260B	8/21/2007
Methyl-t-butyl ether (MTBE)	20000	70	ug/L	EPA 8260B	8/21/2007
Diisopropyl ether (DIPE)	< 70	70	ug/L	EPA 8260B	8/21/2007
Ethyl-t-butyl ether (ETBE)	< 70	70	ug/L	EPA 8260B	8/21/2007
Tert-amyl methyl ether (TAME)	160	70	ug/L	EPA 8260B	8/21/2007
Tert-Butanol	160000	400	ug/L	EPA 8260B	8/21/2007
TPH as Gasoline	< 7000	7000	ug/L	EPA 8260B	8/21/2007
Toluene - d8 (Surr)	98.5		% Recovery	EPA 8260B	8/21/2007
4-Bromofluorobenzene (Surr)	88.0		% Recovery	EPA 8260B	8/21/2007
TPH as Diesel (Note: MRL increased due to interference	< 3000	3000 e-range hydr	ug/L	M EPA 8015	8/25/2007

107 % Recovery M EPA 8015 8/25/2007 Octacosane (Diesel Surrogate)

Approved By:

Report Number: 58075

Lab Number: 58075-08

Date: 8/27/2007

Date: 8/27/2007

QC Report : Method Blank Data

Project Name: NAZ EAGLE GAS STATION

Project Number : **ZP046**

Parameter	Measured Value	Method Reporti Limit		Analysis Method	Date Analyzed
TPH as Diesel	< 50	50	ug/L	M EPA 8015	8/21/2007
Octacosane (Diesel Surrogate)	115		%	M EPA 8015	8/21/2007
TPH as Diesel	< 50	50	ug/L	M EPA 8015	8/23/2007
Octacosane (Diesel Surrogate)	122		%	M EPA 8015	8/23/2007
Benzene	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	8/20/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	8/20/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	8/20/2007
Toluene - d8 (Surr)	98.6		%	EPA 8260B	8/20/2007
4-Bromofluorobenzene (Surr)	89.4		%	EPA 8260B	8/20/2007
Benzene	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	8/21/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	8/21/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	8/21/2007
Toluene - d8 (Surr)	93.7		%	EPA 8260B	8/21/2007
4-Bromofluorobenzene (Surr)	96.0		%	EPA 8260B	8/21/2007

		Method	i		
	Measured	Report	ing	Analysis	Date
Parameter	Value	Limit	Units	Method	Analyzed

KIFF ANALYTICAL, LLC

Date: 8/27/2007

Project Name: NAZ EAGLE GAS

QC Report : Matrix Spike/ Matrix Spike Duplicate

Project Number : ZP0461

Parameter	Spiked Sample	Sample Value	Spike Level	Spike Dup. Level	Spiked Sample Value	Duplicate Spiked Sample Value	e Units	Analysis Method	Date Analyzed	Spiked Sample Percent I Recov.	Duplicat Spiked Sample Percent Recov.	Relative	Spiked Sample Percent Recov. Limit	Relative Percent Diff. Limit
Benzene	58073-01	<0.50	39.9	39.8	43.6	43.8	ug/L	EPA 8260B	8/20/07	109	110	0.599	70-130	25
Toluene	58073-01	<0.50	39.9	39.8	42.6	43.3	ug/L	EPA 8260B	8/20/07	107	108	1.70	70-130	25
Tert-Butanol	58073-01	<5.0	200	199	215	213	ug/L	EPA 8260B	8/20/07	108	107	0.834	70-130	25
Methyl-t-Butyl Ethe	er 58073-01	<0.50	39.9	39.8	41.1	39.0	ug/L	EPA 8260B	8/20/07	103	97.8	4.99	70-130	25
Benzene	58055-05	15	39.9	40.0	55.6	54.6	ug/L	EPA 8260B	8/21/07	102	99.6	2.76	70-130	25
Toluene	58055-05	62	39.9	40.0	97.3	91.6	ug/L	EPA 8260B	8/21/07	87.0	72.6	18.1	70-130	25
Tert-Butanol	58055-05	<5.0	200	200	216	213	ug/L	EPA 8260B	8/21/07	108	106	1.64	70-130	25
Methyl-t-Butyl Ethe	er 58055-05	1.1	39.9	40.0	38.4	39.3	ug/L	EPA 8260B	8/21/07	93.5	95.5	2.12	70-130	25
TPH as Diesel	Blank	<50	1000	1000	1010	932	ug/L	M EPA 8015	8/21/07	101	93.2	8.34	70-130	25
TPH as Diesel	Blank	<50	1000	1000	907	1000	ug/L	M EPA 8015	8/23/07	90.7	100	9.78	70-130	25

Approved By:

KIFF ANALYTICAL, LLC

Date: 8/27/2007

Project Name: NAZ EAGLE GAS

QC Report : Laboratory Control Sample (LCS)

Project Number: **ZP046**l

Parameter	Spike Level	Units	Analysis Method	Date Analyzed	LCS Percent Recov.	LCS Percent Recov. Limit	
Benzene	40.0	ug/L	EPA 8260B	8/20/07	111	70-130	
Toluene	40.0	ug/L	EPA 8260B	8/20/07	109	70-130	
Tert-Butanol	200	ug/L	EPA 8260B	8/20/07	109	70-130	
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	8/20/07	97.5	70-130	
Benzene	40.0	ug/ L	EPA 8260B	8/21/07	107	70-130	
Toluene	40.0	ug/L	EPA 8260B	8/21/07	104	70-130	
Tert-Butanol	200	ug/L	EPA 8260B	8/21/07	101	70-130	
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	8/21/07	100	70-130	

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Project Contact (Hardcopy or PDF				nia EDF	Repor	t?		Yes		No				Cha	ain-	of-C	Cust	ody	, Re	CO	rd a	nd .	Anal	 Ivsi	s Req	uest		_
Company / Address: CLARINA				ng Com	pany L	og Co	ode;	7/2										alys								TA	T	-
Phone #: Con 2011 2 Fax		10,00	Global ²	1D:		وسر	ω	6d.	<u>/</u> >			5.0 ppb					(e)			ater)						12		
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Date: 08/27/2007

Karel Detterman Clearwater Group, Inc. 229 Tewksbury Avenue Point Richmond, CA 94801

Subject : 10 Water Samples

Project Name: NAZ EAGLE GAS STATION

Project Number: ZP046I

Dear Ms. Detterman,

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: 08/27/2007

Subject :

10 Water Samples

Project Name:

NAZ EAGLE GAS STATION

Project Number:

ZP0461

Case Narrative

The Method Reporting Limit for Tert-amyl methyl ether has been increased due to the presence of an interfering compound for sample MW-2.

Sample IS-3 did not contain visible sediment. Sample IS-5 contained a trace of sediment, which was not included in the aliquot that was analyzed by EPA Method 8260B.

Approved By:

Joe Kiff



Project Number: ZP046I

Matrix: Water

Lab Number : 58076-01

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007

Sample: IS-4

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	< 150	150	ug/L	EPA 8260B	08/27/2007
Toluene	< 150	150	ug/L	EPA 8260B	08/27/2007
Ethylbenzene	< 150	150	ug/L	EPA 8260B	08/27/2007
Total Xylenes	< 150	150	ug/L	EPA 8260B	08/27/2007
Methyl-t-butyl ether (MTBE)	85000	150	ug/L	EPA 8260B	08/27/2007
Diisopropyl ether (DIPE)	< 150	150	ug/L	EPA 8260B	08/27/2007
Ethyl-t-butyl ether (ETBE)	< 150	150	ug/L	EPA 8260B	08/27/2007
Tert-amyl methyl ether (TAME)	360	150	ug/L	EPA 8260B	08/27/2007
Tert-Butanol	280000	700	ug/L	EPA 8260B	08/27/2007
TPH as Gasoline	< 15000	15000	ug/L	EPA 8260B	08/27/2007
Toluene - d8 (Surr)	102		% Recovery	EPA 8260B	08/27/2007
4-Bromofluorobenzene (Surr)	92.8		% Recovery	EPA 8260B	08/27/2007
TPH as Diesel	1000	50	ug/L	M EPA 8015	08/25/2007
Octacosane (Diesel Surrogate)	105		% Recovery	M EPA 8015	08/25/2007

Approved By:

Joel Kiff



Project Number: **ZP046I**

Matrix: Water

Lab Number : 58076-02

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007

Sample: IS-6

Sample Date :08/16/2007		Method			
Parameter	Measured Value	Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	560	90	ug/L	EPA 8260B	08/21/2007
Toluene	< 90	90	ug/L	EPA 8260B	08/21/2007
Ethylbenzene	< 90	90	ug/L	EPA 8260B	08/21/2007
Total Xylenes	< 90	90	ug/L	EPA 8260B	08/21/2007
Methyl-t-butyl ether (MTBE)	8000	90	ug/L	EPA 8260B	08/21/2007
Diisopropyl ether (DIPE)	< 90	90	ug/L	EPA 8260B	08/21/2007
Ethyl-t-butyl ether (ETBE)	< 90	90	ug/L	EPA 8260B	08/21/2007
Tert-amyl methyl ether (TAME)	100	90	ug/L	EPA 8260B	08/21/2007
Tert-Butanol	220000	500	ug/L	EPA 8260B	08/21/2007
TPH as Gasoline	< 9000	9000	ug/L	EPA 8260B	08/21/2007
Toluene - d8 (Surr)	99.3		% Recovery	EPA 8260B	08/21/2007
4-Bromofluorobenzene (Surr)	99.5		% Recovery	EPA 8260B	08/21/2007
TPH as Diesel	1700	50	ug/L	M EPA 8015	08/23/2007
Octacosane (Diesel Surrogate)	110		% Recovery	M EPA 8015	08/23/2007

Approved By:

Joel Kiff



Project Number: ZP046I

Sample: IS-3 Matrix: Water Lab Number: 58076-03

Sample Date :08/16/2007 Method Measured Reporting **Analysis** Date Units Method Analyzed Value Limit Parameter **EPA 8260B** 08/21/2007 2800 1500 ug/L Benzene 08/21/2007 **EPA 8260B** 1500 ug/L < 1500 Toluene 08/21/2007 ug/L **EPA 8260B** < 1500 1500 Ethylbenzene **EPA 8260B** 08/21/2007 1500 ug/L < 1500 **Total Xylenes** 08/23/2007 960000 **EPA 8260B** 2500 ug/L Methyl-t-butyl ether (MTBE) 08/21/2007 **EPA 8260B** 1500 ug/L Diisopropyl ether (DIPE) < 1500 08/21/2007 1500 ug/L **EPA 8260B** < 1500 Ethyl-t-butyl ether (ETBE) **EPA 8260B** 08/21/2007 1500 ug/L 4300 Tert-amyl methyl ether (TAME) 15000 ug/L **EPA 8260B** 08/23/2007 98000 Tert-Butanoi **EPA 8260B** 08/21/2007 150000 ug/L **TPH as Gasoline** < 150000 08/21/2007 % Recovery EPA 8260B 104 Toluene - d8 (Surr) % Recovery **EPA 8260B** 08/21/2007 4-Bromofluorobenzene (Surr) 101 M EPA 8015 08/23/2007 **TPH as Diesel** < 3000 3000 ug/L (Note: MRL increased due to interference from Gasoline-range hydrocarbons.) 08/23/2007 109 % Recovery M EPA 8015 Octacosane (Diesel Surrogate)

Approved By:

Joel Kiff

Report Number: 58076 Date: 08/27/2007



Project Number: ZP046l

Sample: IS-5

Matrix : Water Lab Number : 58076-04

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007		Method			
Parameter	Measured Value	Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	4300	500	ug/L	EPA 8260B	08/21/2007
Toluene	< 500	500	ug/L	EPA 8260B	08/21/2007
Ethylbenzene	2100	500	ug/L	EPA 8260B	08/21/2007
Total Xylenes	990	500	ug/L	EPA 8260B	08/21/2007
Methyl-t-butyl ether (MTBE)	310000	500	ug/L	EPA 8260B	08/21/2007
Diisopropyl ether (DIPE)	< 500	500	ug/L	EPA 8260B	08/21/2007
Ethyl-t-butyl ether (ETBE)	< 500	500	ug/L	EPA 8260B	08/21/2007
Tert-amyl methyl ether (TAME)	3400	500	ug/L	EPA 8260B	08/21/2007
Tert-Butanol	48000	2500	ug/L	EPA 8260B	08/23/2007
TPH as Gasoline	< 50000	50000	ug/L	EPA 8260B	08/21/2007
Toluene - d8 (Surr)	99.2		% Recovery	EPA 8260B	08/21/2007
4-Bromofluorobenzene (Surr)	98.4		% Recovery	EPA 8260B	08/21/2007
TPH as Diesel (Note: MRL increased due to interference	< 10000 e from Gasoline	10000 -range hydrod	ug/L carbons.)	M EPA 8015	08/23/2007
Octacosane (Diesel Surrogate)	80.2		% Recovery	M EPA 8015	08/23/2007

Approved By:

Joel Kiff



NAZ EAGLE GAS STATION Project Name :

Project Number: ZP046I

Matrix: Water

Lab Number: 58076-05

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007

Sample: EW-2

Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
1300	150	ug/L	EPA 8260B	08/21/2007
< 150	150	ug/L	EPA 8260B	08/21/2007
250	150	ug/L	EPA 8260B	08/21/2007
< 150	150	ug/L	EPA 8260B	08/21/2007
100000	150	ug/L	EPA 8260B	08/21/2007
< 150	150	ug/L	EPA 8260B	08/21/2007
< 150	150	ug/L	EPA 8260B	08/21/2007
700	150	ug/L	EPA 8260B	08/21/2007
75000	700	ug/L	EPA 8260B	08/21/2007
< 15000	15000	ug/L	EPA 8260B	08/21/2007
99.3		% Recovery	EPA 8260B	08/21/2007
99.7		% Recovery	EPA 8260B	08/21/2007
< 2000	2000	ug/L	M EPA 8015	08/23/2007
rom Gasoline-	range hydrod	carbons.)		
110		% Recovery	M EPA 8015	08/23/2007
	Value 1300 < 150 250 < 150 100000 < 150 < 150 700 75000 < 15000 99.3 99.7 < 2000 from Gasoline-	Measured Value Reporting Limit 1300 150 < 150 150 250 150 < 150 150 < 150 150 < 150 150 700 150 75000 700 < 15000 15000 99.3 99.7 < 2000 2000 from Gasoline-range hydrod	Measured Value Reporting Limit Units 1300 150 ug/L < 150 150 ug/L 250 150 ug/L < 150 150 ug/L < 150 150 ug/L < 150 150 ug/L < 150 150 ug/L 700 150 ug/L < 15000 700 ug/L < 15000 15000 ug/L 99.3 % Recovery < 2000 2000 ug/L from Gasoline-range hydrocarbons.)	Measured Value Reporting Limit Units Analysis Method 1300 150 ug/L EPA 8260B < 150 150 ug/L EPA 8260B 250 150 ug/L EPA 8260B < 150 150 ug/L EPA 8260B 700 150 ug/L EPA 8260B < 15000 700 ug/L EPA 8260B < 15000 15000 ug/L EPA 8260B < 15000 15000 ug/L EPA 8260B < 15000 15000 ug/L EPA 8260B < 2000 2000 ug/L M EPA 8260B < 2000 2000 ug/L M EPA 8015 from Gasoline-range hydrocarbons.) M EPA 8015

Approved By:



Project Number: ZP046I

Matrix: Water

Lab Number: 58076-06

Report Number: 58076

Date: 08/27/2007

Sample : **MW-2** Sample Date :08/16/2007

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	100	50	ug/L	EPA 8260B	08/22/2007
Toluene	< 50	50	ug/L	EPA 8260B	08/22/2007
Ethylbenzene	< 50	50	ug/L	EPA 8260B	08/22/2007
Total Xylenes	< 50	50	ug/ L	EPA 8260B	08/22/2007
Methyl-t-butyl ether (MTBE)	21000	50	ug/L	EPA 8260B	08/22/2007
Diisopropyl ether (DIPE)	< 50	50	ug/L	EPA 8260B	08/22/2007
Ethyl-t-butyl ether (ETBE)	< 50	50	ug/L	EPA 8260B	08/22/2007
Tert-amyl methyl ether (TAME)	< 80	80	ug/L	EPA 8260B	08/22/2007
Tert-Butanol	100000	250	ug/L	EPA 8260B	08/22/2007
TPH as Gasoline	< 5000	5000	ug/L	EPA 8260B	08/22/2007
Toluene - d8 (Surr)	98.4		% Recovery	EPA 8260B	08/22/2007
4-Bromofluorobenzene (Surr)	101		% Recovery	EPA 8260B	08/22/2007
TPH as Diesel	610	50	ug/L	M EPA 8015	08/23/2007
Octacosane (Diesel Surrogate)	110		% Recovery	M EPA 8015	08/23/2007

Approved By:

Joel Kiff



Project Number: ZP046I

Matrix : Water

Lab Number: 58076-07

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007

Sample: MW-4

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	2400	1500	ug/L	EPA 8260B	08/23/2007
Toluene	< 1500	1500	ug/L	EPA 8260B	08/23/2007
Ethylbenzene	< 1500	1500	ug/L	EPA 8260B	08/23/2007
Total Xylenes	< 1500	1500	ug/L	EPA 8260B	08/23/2007
Methyl-t-butyl ether (MTBE)	630000	1500	ug/L	EPA 8260B	08/23/2007
Diisopropyl ether (DIPE)	< 1500	1500	ug/L	EPA 8260B	08/23/2007
Ethyl-t-butyl ether (ETBE)	< 1500	1500	ug/L	EPA 8260B	08/23/2007
Tert-amyl methyl ether (TAME)	4300	1500	ug/L	EPA 8260B	08/23/2007
Tert-Butanol	130000	7000	ug/L	EPA 8260B	08/23/2007
TPH as Gasoline	< 150000	150000	ug/L	EPA 8260B	08/23/2007
Toluene - d8 (Surr)	96.8		% Recovery	EPA 8260B	08/23/2007
4-Bromofluorobenzene (Surr)	100		% Recovery	EPA 8260B	08/23/2007
TPH as Diesel	4400	50	ug/L	M EPA 8015	08/23/2007
Octacosane (Diesel Surrogate)	112		% Recovery	M EPA 8015	08/23/2007

Approved By:

loel Kiff



Project Number: ZP046I

Matrix: Water

Lab Number: 58076-08

Report Number: 58076

Date: 08/27/2007

Sample : **MW-5**Sample Date :08/16/2007

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	< 250	250	ug/L	EPA 8260B	08/22/2007
Toluene	< 250	250	ug/L	EPA 8260B	08/22/2007
Ethylbenzene	< 250	250	ug/L	EPA 8260B	08/22/2007
Total Xylenes	< 250	250	ug/L	EPA 8260B	08/22/2007
Methyl-t-butyl ether (MTBE)	130000	250	ug/L	EPA 8260B	08/22/2007
Diisopropyl ether (DIPE)	< 250	250	ug/L	EPA 8260B	08/22/2007
Ethyl-t-butyl ether (ETBE)	< 250	250	ug/L	EPA 8260B	08/22/2007
Tert-amyl methyl ether (TAME)	550	250	ug/L	EPA 8260B	08/22/2007
Tert-Butanol	620000	1500	ug/L	EPA 8260B	08/22/2007
TPH as Gasoline	< 25000	25000	ug/L	EPA 8260B	08/22/2007
Toluene - d8 (Surr)	98.6		% Recovery	EPA 8260B	08/22/2007
4-Bromofluorobenzene (Surr)	100		% Recovery	EPA 8260B	08/22/2007
TPH as Diesel	950	50	ug/L	M EPA 8015	08/23/2007
Octacosane (Diesel Surrogate)	112		% Recovery	M EPA 8015	08/23/2007

Approved By:

Joel Kiff



Project Number: ZP046I

Matrix: Water

Lab Number: 58076-09

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007

Sample: MW-8

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	420	250	ug/L	EPA 8260B	08/23/2007
Toluene	< 250	250	ug/L	EPA 8260B	08/23/2007
Ethylbenzene	< 250	250	ug/L	EPA 8260B	08/23/2007
Total Xylenes	< 250	250	ug/L	EPA 8260B	08/23/2007
Methyl-t-butyl ether (MTBE)	150000	250	ug/L	EPA 8260B	08/23/2007
Diisopropyl ether (DIPE)	< 250	250	ug/L	EPA 8260B	08/23/2007
Ethyl-t-butyl ether (ETBE)	< 250	250	ug/L	EPA 8260B	08/23/2007
Tert-amyl methyl ether (TAME)	460	250	ug/L	EPA 8260B	08/23/2007
Tert-Butanol	210000	1500	ug/L	EPA 8260B	08/23/2007
TPH as Gasoline	< 25000	25000	ug/L	EPA 8260B	08/23/2007
Toluene - d8 (Surr)	93.6		% Recovery	EPA 8260B	08/23/2007
4-Bromofluorobenzene (Surr)	96.8		% Recovery	EPA 8260B	08/23/2007
TPH as Diesel	4400	50	ug/L	M EPA 8015	08/25/2007
Octacosane (Diesel Surrogate)	112		% Recovery	M EPA 8015	08/25/2007

Approved By:

Joel Kiff



Project Number: **ZP046I**

20.401

Matrix : Water

Lab Number : 58076-10

Report Number: 58076

Date: 08/27/2007

Sample Date :08/16/2007

Sample: EW-1

Parameter	Measured Value	Method Reporting Limit	Units	Analysis Method	Date Analyzed
Benzene	1900	800	ug/L	EPA 8260B	08/21/2007
Toluene	< 800	800	ug/L	EPA 8260B	08/21/2007
Ethylbenzene	< 800	800	ug/L	EPA 8260B	08/21/2007
Total Xylenes	< 800	800	ug/L	EPA 8260B	08/21/2007
Methyl-t-butyl ether (MTBE)	680000	2500	ug/L	EPA 8260B	08/23/2007
Diisopropyl ether (DIPE)	< 800	800	ug/L	EPA 8260B	08/21/2007
Ethyl-t-butyl ether (ETBE)	< 800	800	ug/L	EPA 8260B	08/21/2007
Tert-amyl methyl ether (TAME)	3400	800	ug/L	EPA 8260B	08/21/2007
Tert-Butanol	210000	15000	ug/L	EPA 8260B	08/23/2007
TPH as Gasoline	< 80000	80000	ug/L	EPA 8260B	08/21/2007
Toluene - d8 (Surr)	103		% Recovery	EPA 8260B	08/21/2007
4-Bromofluorobenzene (Surr)	102		% Recovery	EPA 8260B	08/21/2007
TPH as Diesel	1400	50	ug/L	M EPA 8015	08/25/2007
Octacosane (Diesel Surrogate)	112		% Recovery	M EPA 8015	08/25/2007

Approved By:

Joel Kiff

Date: 08/27/2007

QC Report : Method Blank Data

Project Name: NAZ EAGLE GAS STATION

Project Number: **ZP046I**

		Method			
	Measured	Reporting		Analysis	Date
Parameter	Value	Limit	Units	Method	Analyzed
TPH as Diesel	< 50	50	ug/L	M EPA 8015	08/22/2007
Octacosane (Diesel Surrogate)	117		%	M EPA 8015	08/22/2007
Benzene	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	08/21/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	08/21/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	08/21/2007
Toluene - d8 (Surr)	99.0		%	EPA 8260B	08/21/2007
4-Bromofluorobenzene (Surr)	90.6		%	EPA 8260B	08/21/2007
Benzene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	08/22/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	08/22/2007
Toluene - d8 (Surr)	98.4		%	EPA 8260B	08/22/2007
4-Bromofluorobenzene (Surr)	87.6		%	EPA 8260B	08/22/2007

Parameter	Measured Value	Method Reporting Limit) Units	Analysis Method	Date Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	08/22/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	08/22/2007
Toluene - d8 (Surr)	98.4		%	EPA 8260B	08/22/2007
4-Bromofluorobenzene (Surr)	89.9		%	EPA 8260B	08/22/2007
Benzene	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	08/27/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	08/27/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	08/27/2007
Toluene - d8 (Surr)	99.2		%	EPA 8260B	08/27/2007
4-Bromofluorobenzene (Surr)	96.3		%	EPA 8260B	08/27/2007

Date: 08/27/2007

QC Report : Method Blank Data

Project Name: NAZ EAGLE GAS STATION

Project Number : **ZP046**

		Method			
	Measured	Reportin	ıg	Analysis	Date
Parameter	Value	Limit	Units	Method	Analyzed
Benzene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Toluene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Ethylbenzene	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Total Xylenes	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Methyl-t-butyl ether (MTBE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Diisopropyl ether (DIPE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Ethyl-t-butyl ether (ETBE)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Tert-amyl methyl ether (TAME)	< 0.50	0.50	ug/L	EPA 8260B	08/22/2007
Tert-Butanol	< 5.0	5.0	ug/L	EPA 8260B	08/22/2007
TPH as Gasoline	< 50	50	ug/L	EPA 8260B	08/22/2007
Toluene - d8 (Surr)	100		%	EPA 8260B	08/22/2007
4-Bromofluorobenzene (Surr)	101		%	EPA 8260B	08/22/2007

Method Reporting Limit Units Analysis Method Date Measured Analyzed <u>Parameter</u>

Date: 08/27/2007

Project Name: NAZ EAGLE GAS

QC Report : Matrix Spike/ Matrix Spike Duplicate

Project Number : **ZP046**l

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.		Relative	Spiked Sample Percent Recov. Limit	Relative Percent Diff. Limit
TPH as Diesel	Blank	<50	1000	1000	930	1030	ug/L	M EPA 8015	8/22/07	93.0	103	9.93	70-130	25
Benzene	58055-01	<0.50	39.8	39.8	40.0	40.3	ug/L	EPA 8260B	8/21/07	101	101	0.413	70-130	25
Toluene	58055-01	28	39.8	39.8	66.2	65.7	ug/L	EPA 8260B	8/21/07	96.2	94.8	1.49	70-130	25
Tert-Butanol	58055-01	<5.0	199	199	206	204	ug/L	EPA 8260B	8/21/07	103	102	0.866	70-130	25
Methyl-t-Butyl Ethe	er 58055-01	<0.50	39.8	39.8	31.4	32.2	ug/L	EPA 8260B	8/21/07	79.0	80.9	2.34	70-130	25
Benzene	58095-03	<0.50	39.9	39.9	42.3	42.1	ug/L	EPA 8260B	8/22/07	106	105	0.555	70-130	25
Toluene	58095-03	<0.50	39.9	39.9	41.7	41.4	ug/L	EPA 8260B	8/22/07	104	104	0.801	70-130	25
Tert-Butanol	58095-03	64	200	200	272	272	ug/L	EPA 8260B	8/22/07	104	104	0.0549	70-130	25
Methyl-t-Butyl Ethe	er 58095-03	4.6	39.9	39.9	41.9	41.6	ug/L	EPA 8260B	8/22/07	93.3	92.7	0.690	70-130	25
Benzene Toluene Tert-Butanol Methyl-t-Butyl Ethe	58097-05 58097-05 58097-05 er 58097-05	<0.50 <0.50 <5.0 <0.50	40.0 40.0 200 40.0	40.0 40.0 200 40.0	42.2 41.3 212 36.5	42.4 41.6 207 37.4	ug/L ug/L ug/L ug/L	EPA 8260B EPA 8260B EPA 8260B EPA 8260B	8/22/07 8/22/07 8/22/07 8/22/07	106 103 106 91.2	106 104 103 93.5	0.330 0.536 2.37 2.50	70-130 70-130 70-130 70-130	25 25 25 25 25
Benzene	58167-07	<0.50	39.7	39.8	40.4	40.0	ug/L	EPA 8260B	8/27/07	102	101	1.19	70-130	25
Toluene	58167-07	<0.50	39.7	39.8	41.0	41.0	ug/L	EPA 8260B	8/27/07	103	103	0.0353	70-130	25
Tert-Butanol	58167-07	<5.0	198	199	199	198	ug/L	EPA 8260B	8/27/07	100	99.5	0.908	70-130	25
Methyl-t-Butyl Eth	er 58167-07	1.6	39.7	39.8	39.9	40.0	ug/L	EPA 8260B	8/27/07	96.4	96.4	0.0263	70-130	25

KIFF ANALYTICAL, LLC

Date: 08/27/2007

Project Name: NAZ EAGLE GAS

QC Report : Matrix Spike/ Matrix Spike Duplicate

Project Number : **ZP046**

Parameter	Spiked Sample	Sample Value	Spike Level	Spike Dup. Level	Spiked Sample Value	Duplicate Spiked Sample Value	e Units	Analysis Method	Date Analyzed		Duplicat Spiked Sample Percent Recov.		Spiked Sample Percent Recov. Limit	Relative Percent Diff. Limit
Benzene	58096-01	<0.50	40.0	40.0	39.1	36.6	ug/L	EPA 8260B	8/22/07	97.8	91.5	6.65	70-130	25
Toluene	58096-01	< 0.50	40.0	40.0	38.8	36.5	ug/L	EPA 8260B	8/22/07	96.9	91.2	6.09	70-130	25
Tert-Butanol	58096-01	80	200	200	271	276	ug/L	EPA 8260B	8/22/07	95.6	97.9	2.33	70-130	25
Methyl-t-Butyl Eth	er 58096-01	11	40.0	40.0	47.0	47.0	ug/L	EPA 8260B	8/22/07	90.0	89.9	0.0414	70-130	25

KIFF ANALYTICAL, LLC

Date: 08/27/2007

Project Name: NAZ EAGLE GAS

QC Report : Laboratory Control Sample (LCS)

Project Number : **ZP046**

Parameter	Spike Level	Units	Analysis Method	Date Analyzed	LCS Percent Recov.	LCS Percent Recov. Limit
Benzene	40.0	ug/L	EPA 8260B	8/21/07	101	70-130
Toluene	40.0	ug/L	EPA 8260B	8/21/07	101	70-130
Tert-Butanol	200	ug/L	EPA 8260B	8/21/07	98.3	70-130
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	8/21/07	77.7	70-130
Benzene	40.0	ug/L	EPA 8260B	8/22/07	106	70-130
Toluene	40.0	ug/L	EPA 8260B	8/22/07	104	70-130
Tert-Butanol	200	ug/L	EPA 8260B	8/22/07	104	70-130
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	8/22/07	95.6	70-130
`						
Benzene	40.0	ug/L	EPA 8260B	8/22/07	106	70-130
Toluene	40.0	ug/L	EPA 8260B	8/22/07	103	70-130
Tert-Butanol	200	ug/L	EPA 8260B	8/22/07	105	70-130
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	8/22/07	92.9	70-130
Benzene	40.0	ug/L	EPA 8260B	8/27/07	103	70-130
Toluene	40.0	ug/L	EPA 8260B	8/27/07	107	70-130
Tert-Butanol	200	ug/L	EPA 8260B	8/27/07	95.0	70-130
Methyl-t-Butyl Ether	40.0	ug/L	EPA 8260B	8/27/07	100	70-130
		- - <u>-</u> -				
Benzene	40.0	ug/L	EPA 8260B	8/22/07	94.8	70-130

KIFF ANALYTICAL, LLC

Date: 08/27/2007

Project Name: NAZ EAGLE GAS

QC Report : Laboratory Control Sample (LCS)

Project Number : **ZP046**

Parameter	Spike Level	Units	Analysis Method	Date Analyzed	LCS Percent Recov.	LCS Percent Recov. Limit	
Toluene	40.0	ug/L	EPA 8260B	8/22/07	93.0	70-130	
Tert-Butanol	200	ug/L	EPA 8260B	8/22/07	97.4	70-130	
Methyl-t-Butyl Ether	40.0	· ug/L	EPA 8260B	8/22/07	98.8	70-130	

Approved By:

Joel Kiff

KIFF (2) Analytical LLC	2795 2nd Street, Suite 30 Davis, CA 95616 Lab: 530.297.4800 Fax: 530.297.4802	0	SRG # / La	ab No.	5	8076	·	Page	of
Project Contact (Hardcopy or PDF To): California EDF Report? Yes No			Chain-of-Custody Record and Analysis Request						
Company / Address Clerk WATER GROUP Sampling Company Log Code:				Analysis Request TAT					
Phone #:) Fax #: Global ID:			9:0 ppb			٥			
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	Lime 40 ml V Poly Glass	HCI HNO ₃ None	Water Soil Air	BE (6	EX (EX)	ad Sc atile	atiie atiie H as	a L	1 Wk
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ATTACHMENT D

CLEARWATER GROUP

Natural Attenuation Processes and Recommended Monitoring Guidelines

The following document details the processes involved in the natural attenuation of petroleum hydrocarbons in soil and groundwater and presents recommendations for monitoring and confirming these processes. By confirming natural attenuation, a conceptual basis is provided for regulatory site closure.

Natural Attenuation Processes

The predominant attenuation process is intrinsic biodegradation (aerobic and anaerobic) mediated by hydrocarbon degrading bacteria. Other factors in natural attenuation include physical and chemical processes such as volatilization, dispersion, sorption and hydrolysis. Unless otherwise referenced, the following information was derived from McAllister and Chiang (1994).

Aerobic degradation.

In aerobic respiration, microbes utilize dissolved oxygen (DO) as an electron acceptor during hydrocarbon oxidation (degradation), producing carbon dioxide, water, and microbial biomass. The electron acceptor is a substance that facilitates the reaction by taking up the electrons released by oxidation; the electron acceptor then becomes reduced during the process of biodegradation.

The aerobic process is the most important form of biodegradation wherever DO concentrations exceed 1 to 2 mg/L. Under hypoxic conditions (0.1 to 2 mg/L DO), aerobic degradation may occur along the edges of the plume while anaerobic degradation predominates in the center of the plume.

Anaerobic degradation.

Microbes may also degrade hydrocarbons via anaerobic processes by utilizing alternate biochemical pathways when DO concentrations are insufficient for aerobic degradation. Anaerobic degradation is much slower than the aerobic process and not all BTEX compounds (benzene, toluene, ethylbenzene, and xylenes) are consistently degraded. Some studies indicate benzene is recalcitrant to anaerobic degradation while others have demonstrated limited degradation (Rifai et al, 1995). Anaerobic degradation generally occurs in the center of the plume where DO has been depleted by aerobic degradation. Research into the efficacy of anaerobic processes is ongoing.

Anaerobic electron acceptors include [in order of sequential use and decreasing redox potential (Eh)]:

- nitrate (NO,),
- oxides of ferric iron (Fe³⁺),
- sulfate (SO_4^{2+}) ,
- water.

The associated biochemical processes are: denitrification (or nitrate reduction), iron reduction, sulfate reduction, and methanogenesis. Manganese (Mn⁴⁺) may also function as an electron acceptor. Nitrate and sulfate reduction do not degrade alkanes such as methane, propane, and butane.

Volatilization

Dissolved plume mass can be reduced by volatilization of contaminants to the vapor phase in the unsaturated zone. Normally volatilization is a negligible component of natural attenuation, however, it may contribute 5% or more of total mass loss in shallow (<15 feet), warm and/or fluctuating water table conditions in permeable soils (Rifai et al, 1995).

Dispersion

Mechanical/molecular mixing reduces dissolved concentrations substantially by lateral spread. No dissolved contaminant mass is removed from the system by this process. Dispersion (D) is generally modeled based on the length of the plume (x). Conservative practice calls for dispersion in the downgradient direction (longitudinal dispersivity, D_x) to be modeled at 0.1 times the plume length. Dispersion in the transverse direction (transverse

dispersivity, D_y) is modeled at 0.33 times D_x ; dispersion in the vertical direction (vertical dispersivity, D_z) is modeled at 0.05 times D_x (Connor, et al., 1995).

Sorption

Contaminants partition between the aqueous phase and the soil matrix. Adsorption onto the soil surface significantly retards migration but does not permanently remove BTEX which may desorb later. Carbon is the most effective sorption material in soils, and although clay minerals and amorphous minerals such as iron hydroxides also have some influence, only sorption to carbon in soil is included in most contaminant fate and transport computer models.

Sorption is controlled by the organic carbon content of soil (f_{OC}) , the chemical specific organic carbon partition coefficient (K_{OC}) , the soil bulk density (ρ_S) , and the water content of the soil as measured by the porosity (ϕ_S) . K_{OC} is a measure of the affinity of a given chemical to sorb from water onto solid organic material (Table 1). Once the porosity, bulk density, K_{OC} , and f_{OC} have been established, the retardation factor (R) for the site can be calculated as follows:

$$R = (1 + k_S * \rho_S / \phi_S)$$
 where: $k_S = f_{OC} * K_{OC}$

The retardation factor is used in transport models (discussed below) as a measure of the degree to which the rate of plume migration is reduced by sorption processes.

Hydrolysis etc.

Other chemical reactions such as hydrolysis may reduce contaminant mass without microbial mediation. Hydrolysis occurs when an organic molecule reacts with water or a component ion of water. Unlike biodegradation, hydrolysis is not catalyzed by microorganisms. Hydrolysis has not been observed to reduce BTEX concentrations, but is significant for halogenated volatile organics (solvents, etc.).

Monitoring Groundwater For Natural Attenuation

Assessment and monitoring of natural attenuation should be performed to confirm that intrinsic bioremediation and other forms of natural attenuation are occurring in the subsurface and are sufficient to limit plume migration by achieving an equilibrium between hydraulic transport (advection) and removal/degradation/reduction of mobile contaminants. To confirm natural attenuation, it needs to be demonstrated that intrinsic factors are limiting migration, and that they will continue to do so until the plume has degraded to acceptable levels.

Natural attenuation can be evaluated by monitoring specific indicator parameters over a given period of time. As further confirmation, simple fate and transport models can be applied to the site using the site-specific information obtained. Several lines of evidence will generally need to be combined to provide a convincing case of natural attenuation. First, it is necessary to establish that the plume is stable or being reduced in terms of size and concentrations, by review of historical data, possibly including statistical analysis. At least one year of monitoring data utilizing an adequate distribution of wells should be sufficient. For all chemical parameters, background concentrations need to be established by sampling one or more clean wells. In addition to plume concentrations, Rifai et al., (1995), recommends, at a minimum, monitoring the following parameters:

- Microbial enumeration [total heterotrophic bacteria (plate count), and total hydrocarbon using bacteria (ASTM method G-2)].
- Temperature (field measurement)
- pH (field measurement)
- Dissolved Oxygen (field measurement or EPA Method 360.1)

If DO is depleted relative to background concentrations, additional monitoring for anaerobic processes may be considered and should include the following:

- Eh (field measurement)
- Sulfate (EPA method 300 or 375.4)
- Nitrate/nitrite (EPA method 300, 353.1 or 353.2)
- Dissolved iron (EPA method 200.7)
- Total iron (EPA Method 236.1 or 6010)

- Methane (field measurement)
- Alkalinity (EPA method 310.1)
- Dissolved carbon dioxide (with alkalinity or method SM406C)

Certain parameters, notably DO and Eh, may be measured in the field using downhole meters. Most of the other parameters require laboratory analysis of a groundwater sample for accurate quantification. Trends in methane concentrations may be identified using an organic vapor meter fitted with an appropriate filter at the wellhead.

The combination of parameters that Clearwater will monitor at a particular site will depend on site-specific conditions and previous site investigation. The minimum set of parameters as defined by Rifai will always be included for at least one clean (background) well and at least one well representative of mid-plume conditions.

The following sections provide a detailed description of monitoring methods and anticipated results for indicator parameters outlined above.

Microbial Populations

Hydrocarbon degrading bacteria are generally ubiquitous; however, the total population of microbes (measured in counts per liter) is dependent on the available energy source (ie., hydrocarbons). To evaluate natural attenuation, microbial counts should include separate enumerations for hydrocarbon degrading bacteria and for total heterotrophic bacteria, both normally obtained from cultured plate counts. The ratio of hydrocarbon degraders to total heterotrophs is the most useful in assessing natural attenuation. This ratio should be relatively large in samples from contaminated wells, compared to the ratio in samples from clean wells, indicating a proliferation of the indicator species in contaminated areas, independent of overall microbial population variations. Such a distribution of bacteria may require 1 to 2 years to become established once hydrocarbon contamination is present. As further confirmation, it may be useful to establish that sufficient concentrations of microbial nutrients such as nitrogen and phosphorous are present in the subsurface.

Groundwater typically contains total microbial counts of 10^3 to 10^8 counts per liter. Lower counts in contaminated areas may indicate toxic conditions. In sites with organic rich soils, microbial populations may be high but hydrocarbon degradation may be inhibited because the microbes preferentially degrade the naturally occurring carbon compounds found in the soils (Cookson, 1995).

pH

pH is best measured with a meter or by collecting a sample for laboratory analysis. The probe portion of pH meters must be regularly cleaned and periodically soaked in solutions designed to remove oil and protein build up. Lowered pH corresponding spatially to the plume may be indicative of the production of organic acid metabolic end-products of aerobic hydrocarbon degradation. Uncontaminated groundwater is commonly slightly alkaline, but pH varies widely depending on many natural and human influenced factors. pH between 6 and 8 is optimal for BTEX degradation.

Redox Potential (Eh)

Eh is a measure of electron activity within a solution. Each pathway of degradation is generally restricted to a prescribed range of Eh values. Hydrocarbon degradation reduces the Eh of the system in which it occurs, unless the groundwater recharge rate exceeds the utilization rate of the electron acceptor (this is normally not the case since mixing is limited). Once an electron acceptor has been utilized and thereby depleted in the system, Eh conditions determine which next electron acceptor in the sequence will become predominant.

The utility of Eh measurement is as an adjunct to electron acceptor concentration measurements (discussed below). Eh must be measured in situ to avoid atmospheric influence as described in the section on DO sampling. Eh units are millivolts (mV). Decreased Eh should coincide with elevated contaminant concentrations, and depleted DO. Very low Eh (reducing conditions: <0 mV) should coincide with depleted anaerobic electron acceptors. Table 2 presents Eh values typical of each biodegradation pathway.

Dissolved Oxygen (DO)

DO is best measured with a downhole meter measuring in mg/L. Some meters also read DO as a percentage of saturation at a given temperature, however, the volumetric concentration has more utility in fate and transport models. Measurement of DO and Eh are both sensitive to several factors associated with field methodologies,

particularly exposure to atmospheric oxygen; hence the preferred use of a downhole meter. It is necessary to strictly adhere to instructions provided with a given model of instrument. DO meters function by permitting a small quantity of oxygen to diffuse across a porous membrane. Consequently, it is necessary to keep water moving in the vicinity of the membrane to prevent a depletion of DO immediately adjacent to the membrane. This can be achieved manually, by a gentle raising and lowering of the meter in the well. The membrane is delicate and must be carefully maintained.

A negative correlation should occur between DO concentrations and hydrocarbon concentrations. Background concentrations should exceed 1 to 2 mg/L for effective aerobic degradation. DO in groundwater is derived from the atmosphere at the recharge area or the vadose zone. Surface water saturated with oxygen by contact with atmospheric air will contain between approximately 7.5 mg/L at 5°C and 12.75 mg/L at 30°C, though these figures may vary somewhat depending on other chemical parameters. DO concentrations in groundwater are generally less than those for surface water by an amount dependent on the quantity of oxidizable materials (e.g. sulfides) in contact with the groundwater, and the length of time the groundwater has been stored in the aquifer. Background groundwater DO concentrations in shallow aquifers can be as high as 12 mg/L in warm conditions or as low as 1 mg/L in cool conditions. (Hem, 1985). DO may be increased by local groundwater recharge (e.g. irrigation). Aerobic degradation typically occurs when Eh is approximately +800 mV (discussed below).

Anaerobic Electron Acceptors

Analysis of water samples for nitrate, dissolved iron, and/or sulfate can provide data indicative of intrinsic bioremediation. The higher the background concentrations the better, unless they are so high as to create toxicity for the microbes or exceed water quality standards. Depleted dissolved electron acceptor concentrations (except iron, see below) in areas of high hydrocarbon concentration are indicative of microbial degradation.

Nitrate. Nitrate concentrations may be derived by analyzing nitrate plus nitrite as N (EPA Method 353.2). This laboratory method calculates total nitrate, since nitrite is metastable in groundwater and seldom present in sufficient quantities to affect the ionic balance (Wiedemeier et al, 1995). The bulk of nitrates in groundwater are derived from human contamination (e.g., agricultural runoff/septic systems). Background concentrations vary widely with human activity in the site vicinity, and would otherwise be commonly less than 1 mg/L. Concentrations considered indicative of a significant biodegradation capacity might be those in excess of 20 mg/L. Denitrification/nitrate reduction typically occurs when Eh is approximately +750 mV (but more than 0 mV).

Iron. Laboratory analysis of iron concentration may be accomplished by collecting an unfiltered groundwater sample to obtain the total iron content (precipitated and dissolved), or by passing the sample through a 0.45 micron filter immediately after collection to obtain the dissolved iron concentration. Iron in groundwater is derived primarily from soil minerals. Dissolved iron concentrations are very sensitive to changes in pH and Eh. Free dissolved ferric iron can only exist stably under extremely acidic conditions (pH<2) (Hem, 1985). Ferric iron reduction to ferrous iron occurs at intermediate Eh values. Under aerobic, moderately acidic or alkaline conditions, dissolved iron is typically present as a hydroxide; the ferric species is ferric orthohydroxide (Wiedemeier et al, 1995). Dissolved ferric iron is usually rapidly reprecipitated as a sulfide, oxide or hydroxide. Since microbes utilize insoluble sedimentary ferric iron oxides as their energy source, producing more soluble ferrous iron, an increase in total dissolved iron is indicative of microbial hydrocarbon degradation.

The solubility of ferrous iron is significantly reduced by the presence of sulfides, the end-product of sulfate reduction (Barker et al, 1995). Analytical results of dissolved ferrous iron concentration will likely give an underestimate, since it is not based on the actual amount of ferric hydroxide (the electron acceptor) present in the aquifer, but the amount of reduced ferrous iron (the end-product) remaining in solution at the time of sampling.

Typical background concentrations of total dissolved iron in groundwater are below 1.0 mg/L. Results in excess of 1.0 mg/L indicate iron-reducing conditions (Cookson, 1995) which may have resulted from anaerobic hydrocarbon degradation. High dissolved iron concentrations may also indicate the presence of very fine particulates, low pH, or high organic content. High organic content induces stability of soluble iron complexes (Hem, 1985). Measurement of the total iron content of a sample is useful as a background datum against which to compare changes in the dissolved concentration.

Sulfate. Sulfate is derived primarily from soil minerals. The occurrence of sulfate reduction may be inferred from the presence of black acid volatile sulfide deposits on materials in long-term contact with contaminated groundwater

(Barker et al, 1995). Pyrite may be precipitated in the soil. Sulfate concentrations in groundwater are naturally higher than those for nitrate. Sulfate concentrations of 100 mg/L might be considered moderate and several hundred mg/L is not uncommon. Concentrations below 40 mg/L are indicative of methanogenic conditions (Cookson, 1995). Sulfate reduction typically occurs when Eh is approximately -200 mV.

Methanogenesis. Under methanogenic conditions (Eh of approximately -250 mV), carbon dioxide and methane are both produced by hydrocarbon oxidation. The utility of measurement of these compounds is discussed below (metabolic end-products).

Carbonate/Hardness/Total alkalinity

One of these associated analyses is typically conducted at the laboratory on collected water samples. Increased carbonate concentration will commonly occur where acidity dissolves carbonates from the soil. concentrations of carbonate will buffer the pH and prevent acid toxicity that may result from hydrocarbon degradation. Total alkalinity (as carbonate) concentrations exceeding 100 mg/L may be considered conducive to effective buffering. Dissolved carbon dioxide may be assessed in conjunction with total alkalinity analysis.

Metabolic end-products

Metabolic end-products of hydrocarbon biodegradation include carbon dioxide, water, nitrogen, nitrites, ferrous iron, sulfites, sulfides, hydrogen sulfide, and methane. Carbon dioxide, hydrogen sulfide and methane may be measured with a gas meter at the wellhead. Reduced ferrous iron, sulfite and sulfide may be analyzed in water samples. Sulfides may precipitate into the soil and be under-represented in groundwater samples. Nitrite is metastable and therefore nitrite detection (generally <0.1 mg/L) is indicative of ongoing denitrification. Ammonium ions in excess of 1.0 mg/L may also be indicative of anaerobic conditions. Elevated concentrations of all metabolic end-products should correlate positively with elevated hydrocarbons.

Field measurement of dissolved carbon dioxide (DCD) is of secondary importance but may provide useful data. Dissolved carbon dioxide is derived primarily from the atmosphere. Elevated DCD spatially correlated with decreased DO concentration, may be indicative of aerobic microbial hydrocarbon degradation as DCD is a metabolic end-product. Elevated DCD may also result from anaerobic degradation. High background DCD is a desirable feature in terms of the capacity of the groundwater to buffer decreases in pH produced by microbial hydrocarbon degradation which may otherwise limit biological activity. Carbon dioxide is more soluble than oxygen and average concentrations are around an order of magnitude higher.

Contaminant Fate and Transport Modeling

Plume transport can be modeled using simple analytical equations. Transport assuming no attenuation can be modeled and the results compared with field data to provide a preliminary indication of the extent of natural attenuation. Transport models can be modified to include various natural attenuation factors based on actual site data. Comparison of these modeling results to actual field results can be used to confirm natural attenuation.

To model plume transport, the following basic site characteristics need to be determined:

- Historical dissolved hydrocarbon distribution
- Hydraulic conductivity
- Soil density/porosity
- Aguifer thickness
- Groundwater gradient/depth fluctuations
- Possible preferential migration pathways
- Organic content of the soil, foc.

Laboratory analysis of soil samples may be necessary to establish foc, which is useful for modeling sorption. Hydraulic conductivity may be obtained as an estimate from the literature based on soil type (for homogeneous lithologies), or by performing an aquifer test (slug or pump).

For plumes under steady-state conditions, contaminant transport models such as the Domenico Transport Equation can be modified to include the processes of dispersion and sorption to predict contaminant concentrations at a given distance from the source (Connor et al, 1995). In addition, biological and chemical degradation may be collectively modeled by a first-order decay function requiring assignment of a literature-based decay half-life value (in days) for each contaminant. Conservative decay half-life default values from Connor et al (1995) are provided in Table 1. Alternatively, for most realistic results, biodegradation may be modeled based on actual concentrations of electron acceptors, by determining the biodegradation capacity (BC) for each electron acceptor and contaminant concentration (Connor et al, 1995).

The biodegradation capacity is a measure of the actual potential of an electron acceptor (n) to remove contaminant mass. The BCn is calculated for each contaminant and electron acceptor by dividing the concentration of the acceptor in the groundwater by its utilization factor (UF_n). The UF_n can be easily derived from the stoichiometric equation for the particular degradation reaction and represents the ratio of mass of electron acceptor utilized to the mass of hydrocarbon degraded (Wiedemeier, 1995). Values of UFn for benzene for each pathway are presented in Table 2. The sum of the BC_n values obtained for the principal electron acceptors is the total biodegradation capacity of the groundwater (BC,) (Connor et al, 1995). This datum is necessary in contaminant fate and transport models to realistically evaluate the potential for plume attenuation resulting from intrinsic biodegradation.

MTBE is almost completely recalcitrant to biological degradation and does not sorb onto the soil. Due to these properties, MTBE concentrations generally mimic non-attenuated plume transport. Therefore, MTBE may be used as a conservative tracer or "internal standard" for modeling plume transport with no attenuation.

Confirming Natural Attenuation

To best confirm natural attenuation in anticipation of site closure, the assessment and monitoring activities should confirm the following plume characteristics:

- Fieldscale contaminant mass has been reduced (based on historical groundwater analyses). Figure 1 1) illustrates a generally accepted methodology for calculating residual dissolved contaminant mass.
- Microbial activity is occuring in the plume (based on microbial counts) 2)
- The less recalcitrant compounds are reduced in concentration and extent relative to the more recalcitrant 3) compounds. The approximate order of increasing recalcitrance for BTEX aromatics is: toluene, o-xylene, m- and p-xylene, benzene, ethylbenzene. That is, toluene concentrations should be most attenuated; ethylbenzene least attenuated.
- Electron acceptors such as DO, nitrate and sulfate are depleted within the plume 3)
- Metabolic end-products such as carbon dioxide, hydrogen sulfide and methane have accumulated within the 4) plume relative to outside of the plume.

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