

THRIFTY OIL CO.

August 12, 2002

O.30178

10/12/02
AUG 15 2002

Mr. Amer Gholami
Alameda County Health Care Agency
Hazardous Material Specialist
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

RE: Former Thrifty Oil Co. #054
Tosco Marketing Company Station #2602486
2504 Castro Valley Boulevard
Castro Valley, CA 94541
File Review for On and Off-site Petroleum Contamination

Dear Mr. Gholami:

Thrifty Oil Co. (Thrifty) has received the Alameda County Health Care Services (ACHCS) letter dated June 24, 2002, which was written following a review of Thrifty's "Well Abandonment Request" letter dated May 14, 2002. The ACHCS letter declines Thrifty's request to abandon off-site well RS-9. After careful review of the letter, Thrifty conducted an in-house file review of all site assessment and quarterly reports that have been submitted to the ACHCS since 1991. Presented below is a response to items in to the ACHCS letter, based on this file review.

Item 1 of the ACHCS letter states "Groundwater flow has been estimated to be moving in a westerly direction in the past." To the contrary, the general direction of groundwater flow beneath the site has always been easterly. Occasionally, multi-directional flow toward a water trough near the middle of the site has been observed, but groundwater has never flowed in a westerly direction off the Thrifty site. The area/regional groundwater flow at this site has always been easterly; therefore, well RS-9 has always been up-gradient of the site. Attached are a site map and tables that present the date of the quarterly/status report, the general groundwater flow direction, the depth to water and groundwater elevation, and the TPH-g, benzene, and MTBE concentrations in groundwater for wells RE-4 and RS-9. Copies of the last four quarterly report gradient maps (attached) also demonstrate the easterly flow direction. Thrifty can provide the ACHCS all or any groundwater contour maps showing the groundwater flow direction from 1991 to present, and supporting field-gauging data, upon request.

Item 2 of the ACHCS letter states that it is illogical to close a well (RS-9) that is providing valuable information. It is Thrifty's position that it should not be responsible for an up-gradient well containing hydrocarbon constituents which, given the current and historical flow direction data, are

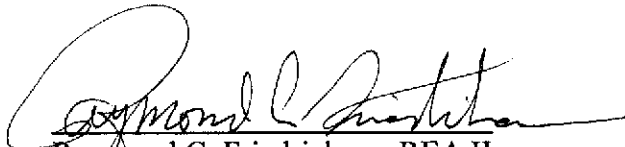


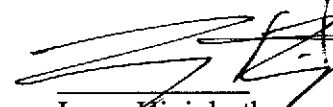
derived from an off-site source. Non-detect data in Thrifty's up-gradient on-site well RE-2 also clearly separates the off-site plume (represented by RS-9), and the on-site plume (represented by RE-4).

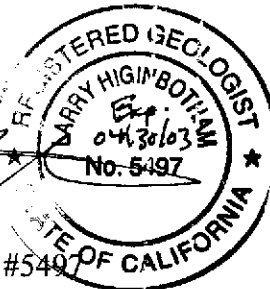
Item 3 of the ACHCS letter, states that any allegation of pollution and/or contamination by the activities by the neighboring property must be substantiated by actual objective field data, rather than opinion. Thrifty believes the data presented in this letter establishes flow direction to the east, and evidence of separation between the off-site plume (RS-9) derived from off-site source(s) and the on-site plume represented by (RE-4). Thrifty does not believe it should be responsible for a well containing contamination from an off-site source, and again requests that well RS-9 be abandoned.

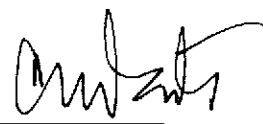
If you have any questions or comments, please contact the undersigned at (562) 921-3581.

Sincerely,


Raymond C. Friedrichsen, REA II
Project Manager, MBA
Senior Environmental Hydrogeologist


Larry Higinbotham
Registered Geologist #5497



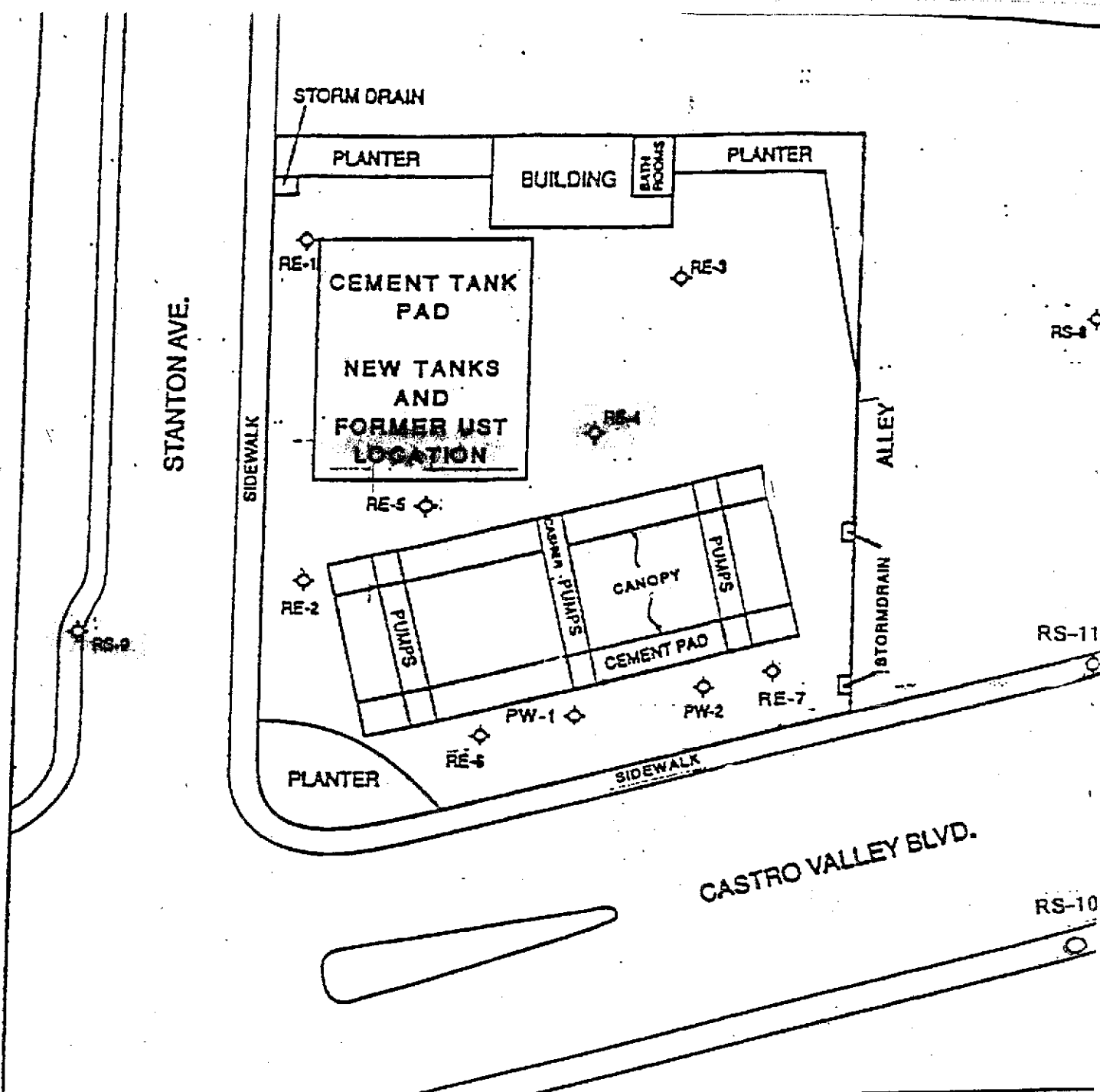

Chris Panaitescu
General Manager
Environmental Affairs

c: Mr. David J. Camille
Tosco Marketing Company
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583

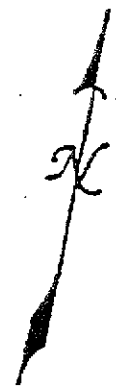
Ms. Erika Assadi
State Water Resources Control Board
Division of Clean Waters Programs
1001 I Street
Sacramento, CA 95814

File

FIGURES

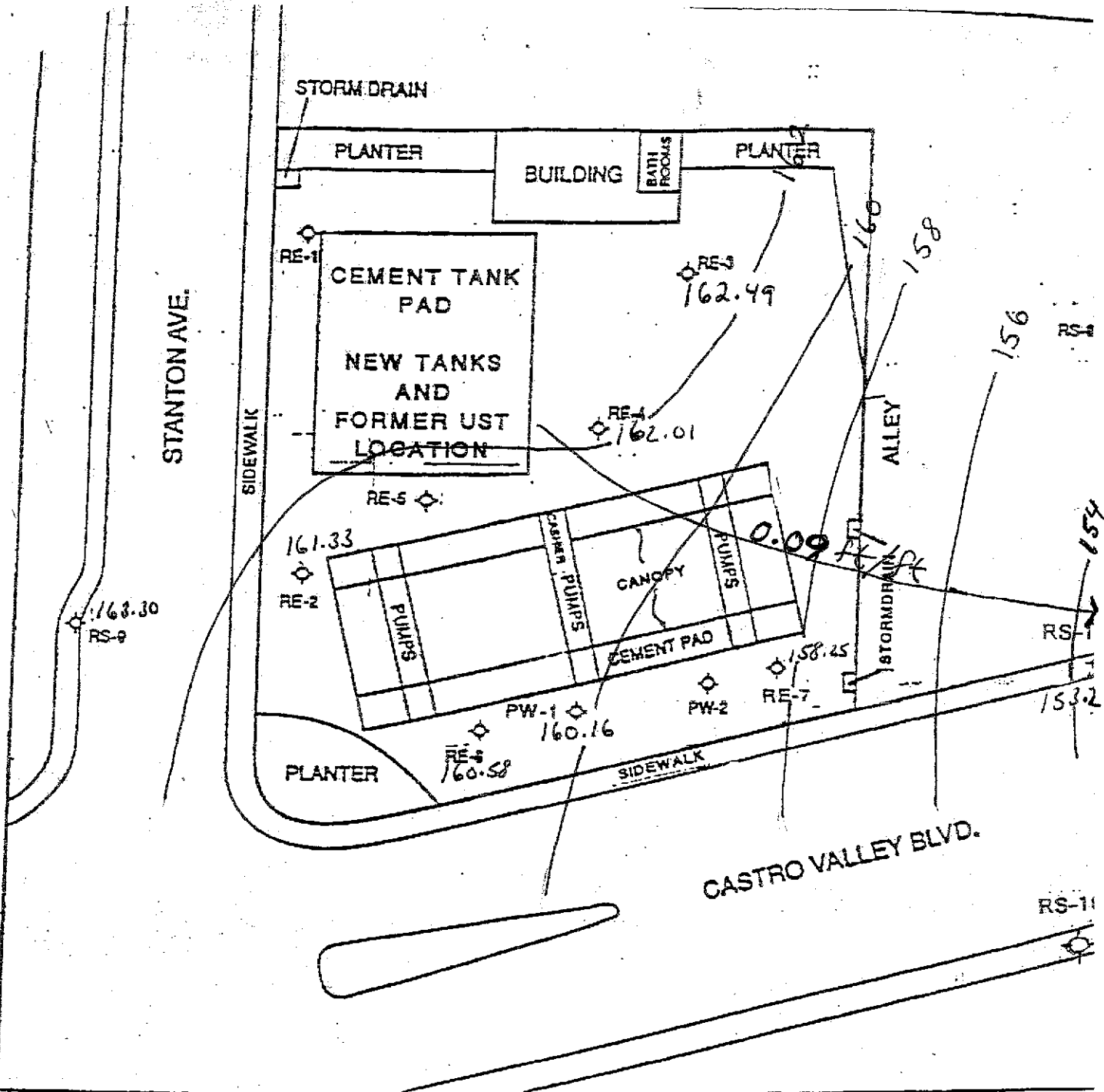


SITE PLAN
 THRIFTY OIL CO. #054
 CASTRO VALLEY, CALIFORNIA
 Prepared for
 THRIFTY OIL CO.
 SANTA FE, SPRINGS
 CALIFORNIA

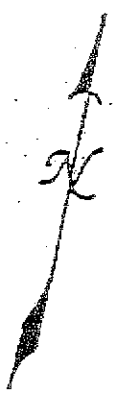
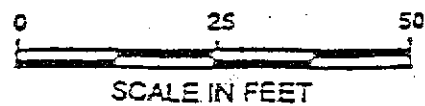


◊ EXISTING MONITORING WELL

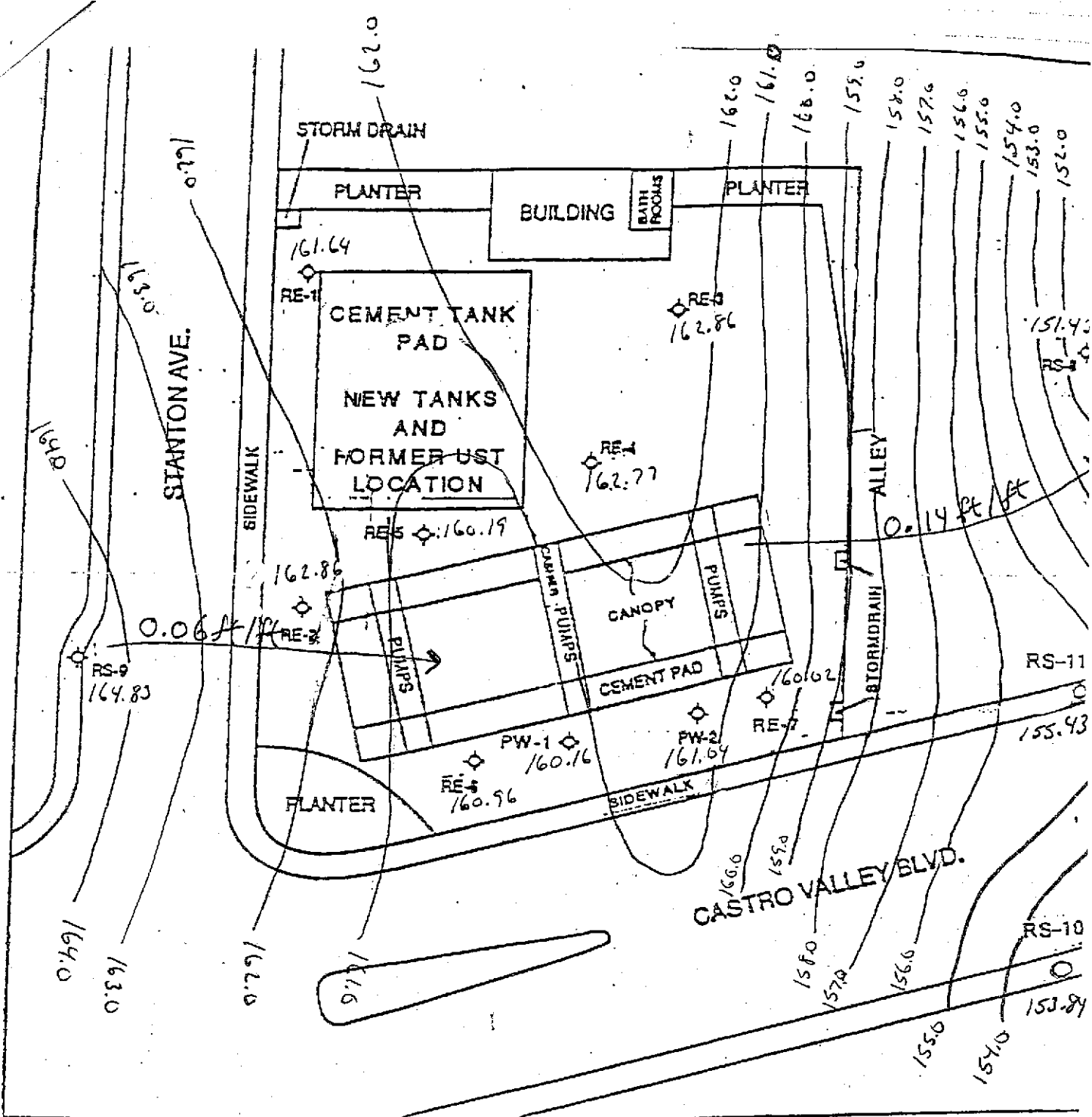
FIGURE 1



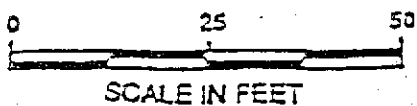
GROUNDWATER CONTOUR MAP
 THRIFTY OIL CO. #054
 CASTRO VALLEY, CALIFORNIA
 Prepared for
 THRIFTY OIL CO.
 SANTA FE, SPRINGS
 CALIFORNIA



◊ EXISTING MONITORING WELL

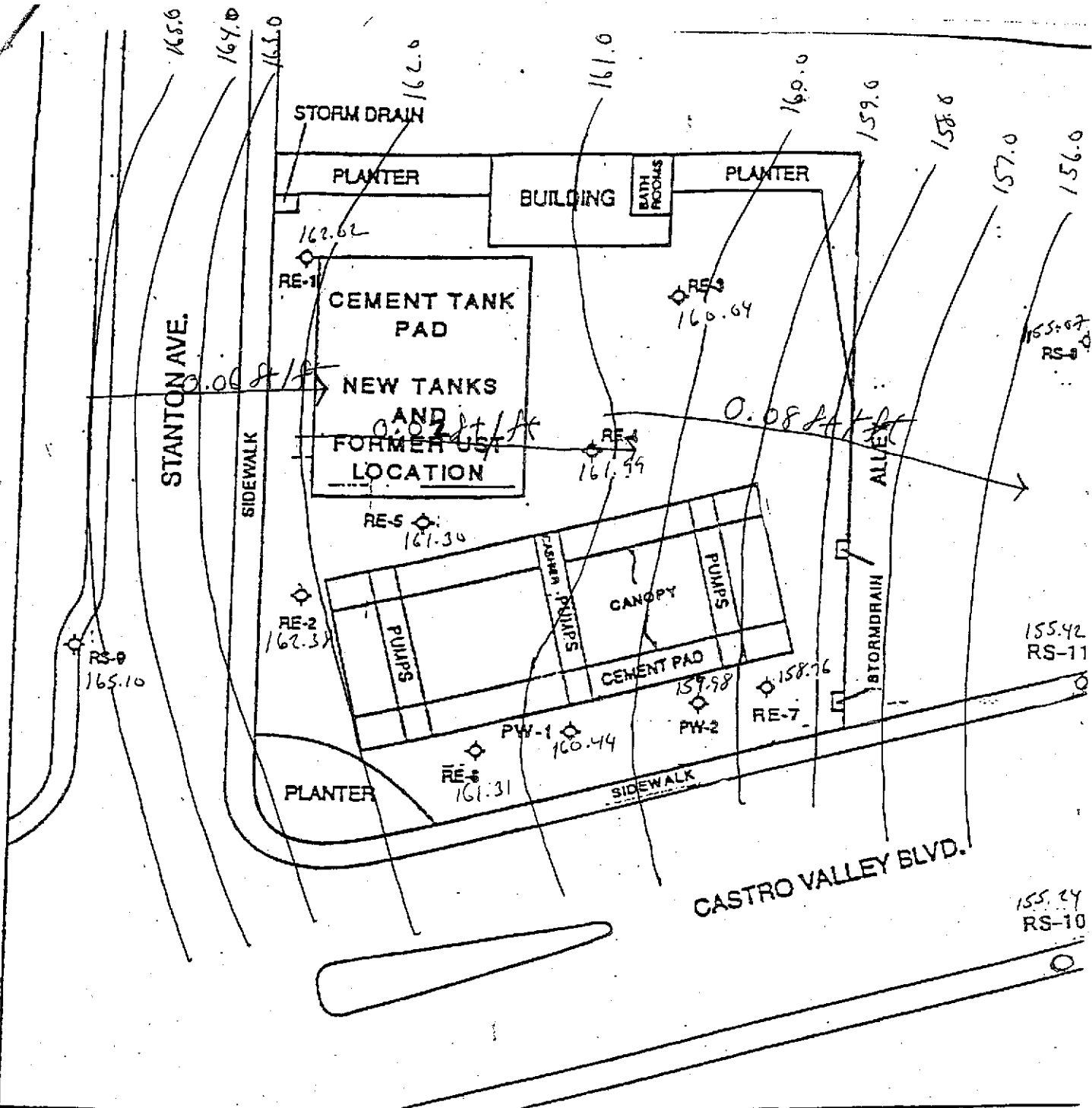


GROUNDWATER CONTOUR MAP
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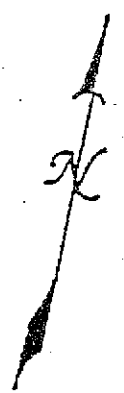


◊ EXISTING MONITORING WELL

03/13/62 FIGURE 1



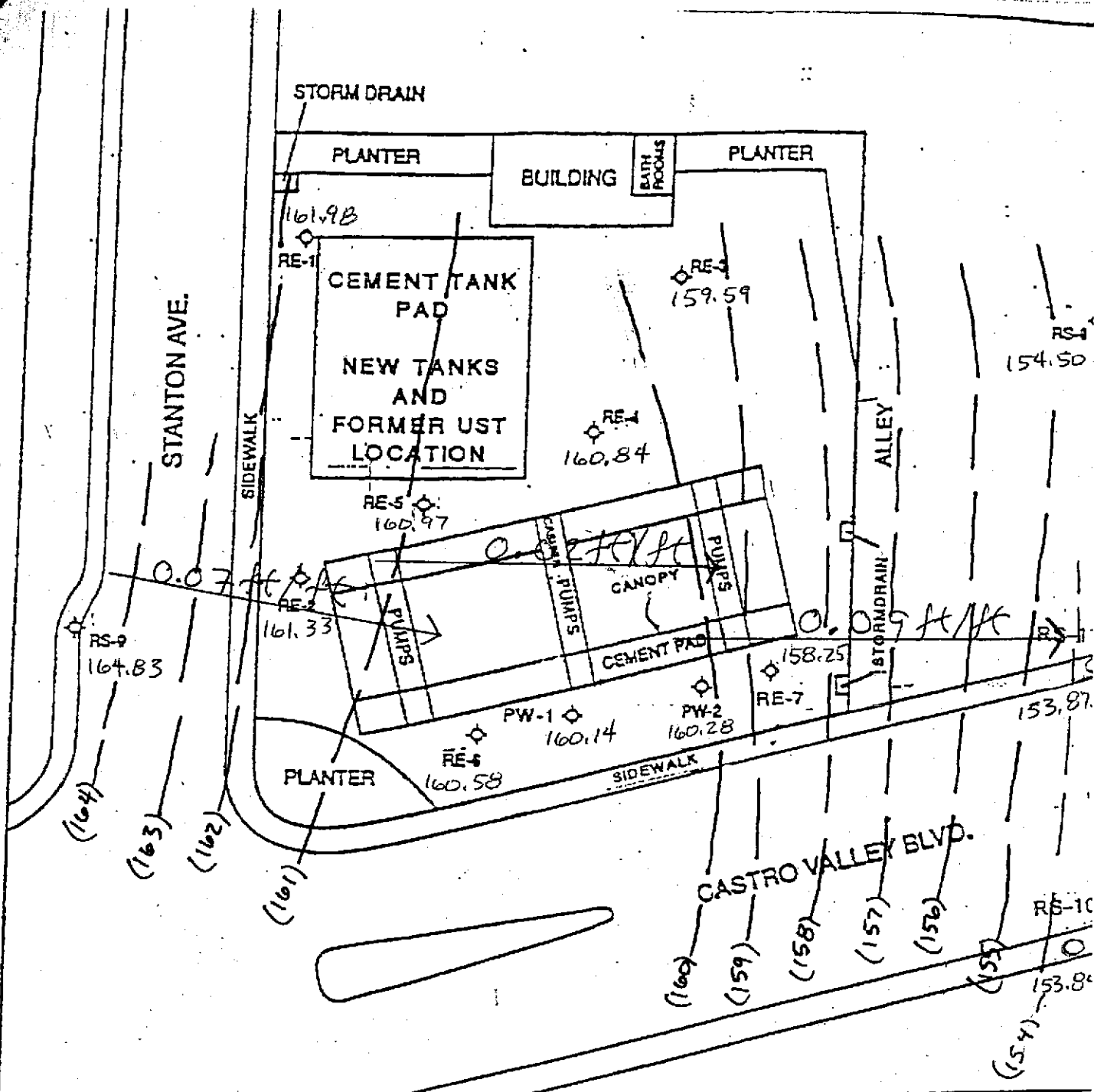
GROUNDWATER CONTOUR MAP
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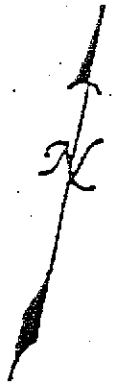
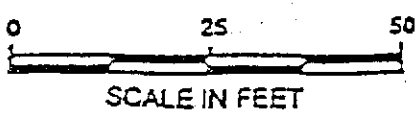
◊ EXISTING MONITORING WELL

FIGURE 1

12/12/01



GROUNDWATER CONTOUR MAP
 THRIFTY OIL CO. #054
 CASTRO VALLEY, CALIFORNIA
 Prepared for
 THRIFTY OIL CO.
 SANTA FE, SPRINGS
 CALIFORNIA



8/30/01

◊ EXISTING MONITORING WELL

FIGURE 1

TABLES

Former Thrifty Station #054 Well RE-4

Date of Monitoring Status/Quarterly	General flow Direction	Casing Elevation	Depth to Water RE-4	Groundwater Elevation	Concentration in TPH RE-4		
					TPH-g	Benzene	MTBE
03/20/91	East	167.39	11.61	155.78	6,500	370	-
05/22/91	East	167.39	10.3	157.09	Film	Film	-
07/17/91	East	167.39	6.2	161.19	Film	Film	-
08/17/91	East	167.39	8.5	158.89	Film	Film	-
10/23/91	East	167.39	11.2	156.19	Film	Film	-
11/06/91	East	167.39	6.62	160.77	Film	Film	-
12/04/91	East	167.39	11.2	156.19	Film	Film	-
03/19/92	East	167.39	5	162.39	Film	Film	-
06/25/92	East	167.39	5.71	161.68	Film	Film	-
09/30/92	East	167.39	6.34	161.05	Film	Film	-
12/23/92	East	167.39	5.5	161.89	Film	Film	-
06/09/93	East	167.39	5.12	162.27	Film	Film	-
09/14/93	East	167.39	10.44	156.95	Film	Film	-
12/14/93	East	167.39	7.52	159.87	Film	Film	-
03/02/94	East	167.39	4.85	162.54	Film	Film	-
06/06/94	East	167.39	5.2	162.19	Film	Film	-
09/06/94	East	167.39	9.85	157.54	Film	Film	-
03/08/95	East	167.39	4.98	162.41	Film	Film	-
06/15/95	East	167.39	-	-	-	-	-
09/05/95	East	167.39	13.72	153.67	-	-	-
11/21/95	East	167.39	12.53	154.86	32,000	46	-
03/11/96	East	167.39	4.72	162.67	1,700	130	-
06/19/96	East	167.39	5.40	161.99	1,700	230	-
09/16/96	East	167.39	5.18	162.21	510	<0.3	800
12/10/96	East	167.39	4.65	162.74	520	<0.3	1,000
03/12/97	East	167.39	3.87	163.52	420	3.2	370
06/12/97	East	167.39	-	-	510	0.66	1,600
09/09/97	East	167.39	5.40	161.99	<50	<0.3	<20
12/12/97	East	167.39	4.60	162.79	1,400	330	2,500
03/03/98	East	167.39	5.05	162.34	3,000	400	3,800
09/10/98	East	167.39	4.60	162.79	2,700	<0.3	7,600
12/30/98	East	167.39	4.20	163.19	530	<0.3	1,500
03/15/99	East	167.39	3.85	163.54	<50	<0.3	<5
06/22/99	East	167.39	3.90	163.49	1,200	23	1,400
09/08/99	East	167.39	5.72	161.67	590	1.5	1,100
12/01/99	East	167.39	5.34	162.05	540	<0.3	880
03/23/00	East	167.39	5.36	162.03	<50	<0.25	<5
06/08/00	East	167.39	5.34	162.05	67	<5	<5
09/27/00	East	167.39	5.35	162.04	<50	<0.18	<0.24
12/13/00	East	167.39	5.71	161.68	<50	<0.18	<0.24
03/22/01	East	167.39	4.19	163.2	<50	<0.18	<0.24
06/15/01	East	167.39	4.57	162.82	409	18	*1,060 / 1,480
08/30/01	East	167.39	6.10	161.29	<50	<0.18	<0.24
12/12/01	East	167.39	4.95	162.44	<50	<0.18	*7 / 3.7
03/13/02	East	167.39	4.17	163.22	511	3	549
6/12/02	East	167.39	4.93	162.46	380	2.9	479

Note: Survey conducted on 06/26/91 by Buche Land Surveying

Former Thrifty Station #054 Well RS-9

Date of Monitoring Status/Quarterly	General flow Direction	Casing Elevation	Depth to Water RS-9	Groundwater Elevation	Concentration in Well RS-9		
					TPH-g	Benzene	MTBE
08/07/91	East	167.51	2.28	165.23	-	0.5	-
09/27/91	East	167.51	2.77	164.74	13,000	3.5	-
10/23/91	East	167.51	3.53	163.98	11,000	ND	-
11/06/91	East	167.51	2.51	165.00	6,800	8.4	-
12/04/91	East	167.51	3.20	164.31	6,500	6.5	-
03/19/92	East	167.51	3.12	164.39	12,000	21	-
06/25/92	East	167.51	2.65	164.86	370	2.3	-
09/30/92	East	167.51	2.80	164.71	9,200	4.8	-
12/23/92	East	167.51	2.45	165.06	2,000	17	-
06/09/93	East	167.51	3.55	163.96	1,300	0.6	-
09/14/93	East	167.51	2.81	164.70	1,500	1.3	-
12/14/93	East	167.51	2.63	164.88	560	ND	-
03/02/94	East	167.51	2.60	164.91	1,100	<0.3	-
06/06/94	East	167.51	2.52	164.99	290	0.58	-
09/06/94	East	167.51	3.16	164.35	890	<0.3	-
03/08/95	East	167.51	4.57	162.94	1,600	<0.5	-
06/15/95	East	167.51	5.08	162.43	3,200	2.2	-
09/05/95	East	167.51	5.72	161.79	1,100	<0.5	-
11/21/95	East	167.51	2.46	165.05	1,100	1.1	-
03/11/96	East	167.51	3.44	164.07	440	0.7	-
06/19/96	East	167.51	3.80	163.71	580	3.8	-
09/16/96	East	167.51	3.80	163.71	490	<0.3	<20
12/10/96	East	167.51	2.76	164.75	<50	<0.3	<20
03/12/97	East	167.51	3.20	164.31	<50	<0.3	<20
06/12/97	East	167.51	-	-	<50	<0.3	<20
09/09/97	East	167.51	4.24	163.27	<50	<0.3	<20
12/12/97	East	167.51	2.72	164.79	<50	<0.3	<20
03/03/98	East	167.51	1.90	165.61	190	<0.3	<20
09/10/98	East	167.51	2.72	164.79	<50	<0.3	<5
12/30/98	East	167.51	1.20	166.31	<50	<0.3	<5
03/15/99	East	167.51	4.25	163.26	<50	<0.3	<5
06/22/99	East	167.51	3.70	163.81	1,300	4.2	<5
09/08/99	East	167.51	2.71	164.80	<50	<0.3	<5
12/01/99	East	167.51	2.70	164.81	<50	<0.3	<5
03/23/00	East	167.51	2.70	164.81	<50	<0.25	<5
06/08/00	East	167.51	2.72	164.79	585	<5	821
09/27/00	East	167.51	2.72	164.79	592	<0.18	*1,180 / 1,360
12/13/00	East	167.51	2.70	164.81	<50	<0.18	*403 / 444
03/22/01	East	167.51	2.69	164.82	425	<0.18	*738 / 1,640
06/15/01	East	167.51	2.68	164.83	<50	<0.18	<0.24
08/30/01	East	167.51	2.68	164.83	164	<0.18	*396 / 284
12/12/01	East	167.51	2.41	165.10	1,540	<0.18	*4,370 / 2,480
03/13/02	East	167.51	2.68	164.83	1,540	<0.18	3,360
06/12/02	East	167.51	4.21	163.30	2,020	1	3,280

Note: Survey conducted on 06/26/91 by Buche Land Surveying