

THRIFTY OIL CO.

February 4, 2009

O.93977

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

Local #RO0000005
RWQCB #01-1479

RECEIVED

2:19 pm, Feb 09, 2009

Alameda County
Environmental Health

RE: **Former Thrifty Oil Co. Station #063**
ARCO Products Company Station #9542
6125 Telegraph Avenue
Oakland, CA
Response Letter

Dear Mr. Plunkett:

On December 29, 2008 the Alameda County Health Care Services (ACHCS) sent Thrifty Oil Co. (Thrifty) a letter (2008 Letter) regarding former Thrifty Station #063 located at 6125 Telegraph Avenue, Oakland, California (**Figure 1**). Included in the above mentioned letter were 5 Items listed under the Technical Comments Section. This letter will address the several statements and comments included in Item 4, and related to the anomalous results of remediation system influent groundwater samples collected in May 2006, June 2006, and January 2008. Thrifty plans to address items 1, 2, 3 and 5 by the due date of March 15, 2009.

Listed below (in italics) are the ACHCS statements and comments that were included in Item 4, and Thrifty's responses to those statements and comments:

- A. *High concentrations of dissolved phase petroleum hydrocarbons were originally detected in influent groundwater samples in May 2006;*
- B. *Subsequent influent groundwater sampling conducted in June 2006 detected dissolved phase contamination at concentrations consistent with the high detections of previous sampling events;*
- C. *Furthermore, dissolved phase petroleum hydrocarbon contamination was again detected in influent groundwater collected in February 2008 at concentrations up to 97,800 µg/L TPHg, which is two orders of magnitude greater than the combined monitoring well groundwater sample concentration of approximately 800 µg/L TPHg which was collected in January 2008;*



319 Imperial Hwy, Santa Fe Springs, CA 90670-0138 • Ph: (562)921-3581

Thrifty believes that ACHCS comments A, B, and C are referring to the results of the influent groundwater samples collected on May 23, 2006, June 9, 2006 and February 8, 2008. The result of the June 9, 2006 groundwater system influent sample was an order of magnitude less than the result of the May 23, 2006, therefore the consistency of the results of these two consecutive sampling events is questionable.

A comparison of the results of the two sampling events suggests that whatever caused the May 23, 2006 spike in concentrations could have been a single event and that the lower concentrations detected in the June 9, 2006 results could have been residue from the May 23, 2006 event. Note that these two sampling events were only 17 days apart and only 4,860 gallons of groundwater (a relatively small quantity) was processed by the remediation system during this period. If contamination had been introduced into the groundwater remediation system it would be expected that concentrations would gradually decrease. In fact, each subsequent inlet concentration sample result (July 6 and August 4, 2006) progressively decreased by an order of magnitude which strongly suggests that the May 23, 2006 elevated inlet concentration was anomalous event and not reflective of an ongoing or permanent situation.

On February 8, 2008, influent groundwater sample concentrations once again increased and were the same order of magnitude as the June 9, 2006 samples but an order of magnitude lower than the May 23, 2006 results. Nine separate groundwater inlet samples were collected between February 8, 2008 and June 6, 2006 all of which had lower concentrations than those detected in June 2006. Thrifty therefore does not believe the relatively high February 9, 2008 and June 9, 2006 inlet sample concentrations were in anyway related to each other.

The anomalous concentrations detected in the May 23, 2006, June 9, 2006 and February 8, 2008 influent groundwater samples could have been due to numerous situations including: cross contamination, technician(s) error or laboratory error. The spikes in concentrations could also have been the result seasonal increases or decreases in groundwater elevations, system shutdowns or tidal influences on regional groundwater. The remediation system has been operating since April 8, 1991 (approximately 17 years) and the results of all other influent groundwater samples suggest that the system has been maintained and operated without incident. Influent groundwater sample concentrations have been historically detected on the same order of magnitude as the June 9, 2006 results twelve times (March 3, 1992, June 9, 1994, January 13, 1997, January 7, 1998, February 17, 1998, October 25, 2000, January 10, 2001, April 7, 2003, October 10, 2003, October 4, 2006, June 21, 2007, and June 25, 2008). Many of these historical spikes in influent groundwater sample concentrations have followed system shutdowns (shaded in **Table 1**) or changes in onsite groundwater elevations (shaded in **Table 2**). **Table 1** presents the historical groundwater remediation system monitoring. **Table 2** presents the historical groundwater elevations for groundwater extraction wells MW-3 and MW-4 (the only two wells that

are connected to the groundwater extraction system).

- D. *Thrifty described the results of the influent groundwater sampling as anomalous, possibly as a result of unauthorized dumping of contaminated liquid into the treatment system holding tank;*

It appears that ACHCS statement D refers to comments made by Equipoise in the November 27, 2007 *Revised Site Conceptual Model and Plume Travel Time Report* (SCMU). The statements made in the SCMU were in response to the ACHCS letter dated November 24, 2006 letter (2006 Letter). The ACHCS 2006 Letter referred to the results of the May 23, 2006 and June 9, 2006 groundwater system influent samples and commented that “no investigation or analysis was performed to explain the possible source of free phase hydrocarbon detected in influent water”. In response to the comment ACHCS made in the 2006 Letter, Equipoise stated in the SCMU that they believed the anomalous influent groundwater sample results for the samples collected on May 23, 2006 and June 9, 2006 **could** have been the result of “unauthorized dumping of liquid removed from tanks sumps or other sources into the groundwater system’s holding tank”. Equipoise concluded that results of subsequent groundwater system influent sampling events supported this possibility as they were consistent with the results prior to the anomalous event.

- E. *However, entry into the treatment system is restricted and only authorized personnel could be allowed access. Consequently, a record of access to the treatment system would likely be available to determine if unauthorized dumping of liquid occurred;*

Access to the groundwater system compound is restricted by a 6-feet high chain link fence and locked access gate. Thrifty technicians, EBMUD employees, and Station employees (who are aware of the lock combination and should only be entering the compound in case of an emergency) are the only personnel authorized to enter the remediation compound. There is no need for a log or sign in sheet within the compound, as long as the access is restricted to the following authorized individuals: Thrifty technician for weekly groundwater remediation system operation and maintenance; EBMUD for inspections; and the facility manager for emergencies. Thrifty maintains technician field sheets and EBMUD documents their sampling events; these are the only official records of entry to the compound.

- F. *Unless there is a regular practice of unauthorized dumping of contaminated groundwater into the treatment system, it is unlikely that the results from the influent water samples are anomalous....Please determine if Thrifty personnel may have dumped TPHg contaminated water (purge water/rinse water) into the pre-treatment holding tank.*

The groundwater system was shutdown on January 11, 2008 for the First Quarter 2008 groundwater sampling which was conducted on January 23, 2008. During the First Quarter 2008 sampling event 146 gallons of purge water was removed from the groundwater sampling wells and the technician reported that it was raining on that day.

On January 25, 2008 the groundwater remediation system was restarted (as reported in Thrifty's First Quarter 2008 Status Report dated March 25, 2008) and the purge water disposed of into the groundwater remediation system. This procedure is not considered unauthorized dumping since the source of the system inlet is the site groundwater and the purge water removed from the wells during the quarterly sampling events is from the same source.

At **no time** did Thrifty or Equipoise believe or state that Thrifty personnel performed illegal dumping, Equipoise did however imply in the SCMU that contamination **could** have been introduced to the groundwater extraction system. Thrifty field personnel who operate the remediation system at the site has more than 15 years experience and is 40-hour Hazardous Waste Operations and Emergency Response certified and receive annual 8-hour refresher training. Thrifty personnel who perform the operation and maintenance of the groundwater remediation system at this site have an intimate understanding of the system operation, are familiar with the system permitting requirements, and are extremely experienced in groundwater sample collection techniques and decontamination procedures. **Thrifty has no reason to believe that any of its personnel have ever either purposely or accidentally dumped contaminated waste at the site.** It is unlikely that others have entered the remediation compound but if this were the case there is no way to confirm whether or not this happened.

Equipoise only stated that unauthorized dumping **could** have been the cause of the anomalous results. Without additional evidence such as video surveillance tapes or additional laboratory analysis (finger print analysis to determine whether or not the anomalous results were a consequence of outside contamination being introduced to the system) of the influent groundwater treatment samples collected on May 23, 2006 and June 9, 2006 it is impossible to determine exactly what caused the anomalous results. It does however seem obvious that whatever caused the elevated concentrations on May 23, 2006 was a single event and subsequent influent groundwater sample results have in general been at least two orders of magnitude lower (with of course the exception of the spike in concentrations reported in the sample collected on February 8, 2008).

Thrifty plans to submit report(s) addressing Items 1, 2, 3 and 5 by the due date of March 15, 2009.

Should you have any questions regarding this report, please contact Simon Tregurtha (562) 921-3581 Ext. 260 or the undersigned at Ext 390.

Respectfully submitted,



Simon Tregurtha
Project Manager



LARRY HIGINBOTHAM
No. 5497
EXPIRED 06/30/09
REGISTERED GEOLOGIST
STATE OF CALIFORNIA

Larry Higinbotham
Registered Geologist



Jeff Suryakusuma
Director
Technical Services



Chris Panaitescu
General Manager
Environmental Affairs

cc: BP West Coast Products LLC; Ms. Janet J. Wager
File

TABLES

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET/EFFLUENT							INLET/INFLUENT						
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L		
02/10/97	912,610	651,983	285	82	<0.3	0.38	<0.3	<0.5	-	700	0.92	0.75	<0.3	4.1	-		
03/10/97	921,020	660,393	300	<50	<0.3	<0.3	<0.3	<0.5	-	600	<0.3	<0.3	<0.3	<0.5	-		
04/14/97	932,410	671,783	325	<50	<0.3	<0.3	<0.3	<0.5	-	4,400	<0.3	<0.3	<0.3	<0.5	-		
05/12/97	941,028	680,401	308	<50	<0.3	<0.3	<0.3	<0.5	-	5,600	7.3	0.32	<0.3	17	-		
06/23/97	943,183	682,556	51	-	-	-	-	-	-	-	-	-	-	-	-		
07/07/97	945,821	685,194	188	<50	<0.3	<0.3	<0.3	<0.5	-	1,500	3.4	<0.3	<0.3	26	-		
08/04/97	951,020	690,393	186	-	-	-	-	-	-	-	-	-	-	-	-		
09/02/97	957,933	697,306	238	System shut down due to stolen air compressor							-	-	-	-	-	-	
10/06/97	961,030	700,403	91	-	-	-	-	-	-	-	-	-	-	-	-	-	
10/16/97	961,077	700,450	5	<50	<0.3	<0.3	<0.3	<0.5	-	550	<0.3	<0.3	<0.3	<0.5	-	-	
11/17/97	970,920	710,293	308	-	-	-	-	-	-	-	-	-	-	-	-	-	
12/23/97	986,016	725,389	419	-	-	-	-	-	-	-	-	-	-	-	-	-	
01/05/98	991,520	730,893	423	-	-	-	-	-	-	-	-	-	-	-	-	-	
01/07/98	992,365	731,738	423	<50	<0.3	<0.3	<0.3	<0.5	-	65,000	690	8,400	3,100	20,000	-	-	
02/02/98	996,874	736,247	173	-	-	-	-	-	-	-	-	-	-	-	-	-	
02/09/98	-	736,247	-	System shut down due to the UST replacement and station remodeling							-	-	-	-	-	-	-
02/17/98	-	736,247	-	<50	<0.3	<0.3	<0.3	<0.5	-	35,000	150	<15	<15	8,900	-	-	
04/13/98	53,000	736,247	-	Replaced carbons and restarted system with new meter (53,000)							-	-	-	-	-	-	-
4/13 - 6/1/98	-	736,247	-	System was undergoing several maintenance / piping / hose replacement							-	-	-	-	-	-	-
06/01/98	53,780	737,027	16	-	-	-	-	-	-	-	-	-	-	-	-	-	
07/14/98	56,905	740,152	73	<50	<0.3	<0.3	<0.3	<0.5	-	3,500	14	0.56	<0.3	26	-	-	
08/13/98	59,426	742,673	84	-	-	-	-	-	-	-	-	-	-	-	-	-	
09/11/98	62,356	745,603	101	-	-	-	-	-	-	-	-	-	-	-	-	-	
10/15/98	62,714	745,961	11	<50	<0.3	<0.3	<0.3	<0.5	-	2,200	21	4	<0.3	100	-	-	
11/06/98	62,952	746,199	11	-	-	-	-	-	-	-	-	-	-	-	-	-	
11/20/98	-	746,199	-	System shut down for flowmeter replacement							-	-	-	-	-	-	-
12/01/98	0.0	746,199	-	Restart the system with flowmeter at 000							-	-	-	-	-	-	-
12/31/98	5,340.0	751,539	178	-	-	-	-	-	-	-	-	-	-	-	-	-	
01/11/99	15,020.0	761,219	880	System shut down							-	-	-	-	-	-	-
1/11 - 2/1/99	-	761,219	-	System was undergoing maintenance for the compressor							-	-	-	-	-	-	-
01/20/99	-	761,219	-	<50	<0.3	<0.3	<0.3	<0.5	-	110	0.43	0.42	<0.3	<0.5	260	-	
02/01/99	15,600.0	761,799	28	Restart system							-	-	-	-	-	-	-
02/12/99	22,840.0	769,039	658	-	-	-	-	-	-	-	-	-	-	-	-	-	
02/22/99	22,840.0	769,039	-	System shut down for carbon canister replacement							-	-	-	-	-	-	-
03/26/99	22,840.0	769,039	-	Restart the system							-	-	-	-	-	-	-
03/31/99	24,620.0	770,819	356	-	-	-	-	-	-	-	-	-	-	-	-	-	
04/16/99	29,605.0	775,804	312	<50	<0.3	<0.3	<0.3	<0.5	<5	<50	<0.3	<0.3	<0.3	<0.5	<5	-	
05/11/99	36,010.0	782,209	256	-	-	-	-	-	-	-	-	-	-	-	-	-	
05/25/99	46,000.0	792,199	714	System shut down due to carbon canister leaking							-	-	-	-	-	-	-
09/02/99	46,000.0	792,199	-	Restart system							-	-	-	-	-	-	-
09/17/99	46,217.0	792,416	14	-	-	-	-	-	-	-	-	-	-	-	-	-	
10/07/99	46,809.0	793,008	30	<50	<0.3	<0.3	<0.3	<0.5	11	65	<0.3	<0.3	<0.3	<0.5	120	-	
10/21/99	47,278.0	793,477	34	System shut down for carbon change							-	-	-	-	-	-	-
11/24/99	47,283.0	793,482	0	Restart system							-	-	-	-	-	-	-
12/30/99	49,386.0	795,585	58	-	-	-	-	-	-	-	-	-	-	-	-	-	
01/26/00	50,569.0	796,768	44	<50	<0.3	<0.3	<0.3	<0.5	-	<50	<0.3	<0.3	<0.3	<0.5	-	-	
02/25/00	51,983.0	798,182	47	-	-	-	-	-	-	-	-	-	-	-	-	-	
03/24/00	54,603.0	800,802	94	-	-	-	-	-	-	-	-	-	-	-	-	-	
04/19/00	56,754.0	802,953	83	<5	<0.25	<0.25	<0.25	<0.5	-	<50	1.3	<0.25	<0.25	<0.5	<5	-	
04/30/00	58,022.0	804,221	115	-	-	-	-	-	-	-	-	-	-	-	-	-	
05/26/00	60,086.0	806,285	79	-	-	-	-	-	-	923	<0.6	2	85	80	*8,350/4,810	-	
06/16/00	61,889.0	808,088	86	<50	<0.3	<0.3	<0.3	<0.6	<5	3,820	<0.3	<0.3	<0.3	<0.6	3,740	-	
07/26/00	65,987.0	812,186	102	<50	<0.3	<0.3	<0.3	<0.6	<5	<50	<0.3	<0.3	<0.3	<0.6	<5	-	
08/25/00	68,630.0	814,829	88	-	-	-	-	-	-	-	-	-	-	-	-	-	

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET/EFFLUENT						INLET/INFLUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
09/29/00	85,661.0	831,860	487	-	-	-	-	-	-	-	-	-	-	-	-
10/13/00	96,212.0	842,411	754	-	-	-	-	-	-	-	-	-	-	-	-
10/20/00	99,700.0	845,899	498	Shut down system for QWS and replaced flowmeter starting at 000 (old meter estimated at 99,700). System restarted on 10/25/00 after QWS											
10/25/00	0.0	845,899	-	<50	<0.18	<0.14	<0.18	<0.26	<0.24	17,100	111	121	141	972	998
10/27/00	2,160	848,059	1,080	-	-	-	-	-	-	-	-	-	-	-	-
11/03/00	7,420	853,319	751	-	-	-	-	-	-	-	-	-	-	-	-
11/24/00	16,560	862,459	435	-	-	-	-	-	-	-	-	-	-	-	-
12/22/00	51,530	897,429	1,249	-	-	-	-	-	-	-	-	-	-	-	-
01/10/01	54,520	900,419	157	<50	<0.18	<0.14	<0.18	<0.26	<0.24	10,000	384	223	<0.18	1,330	11,600
02/19/01	99,640	945,539	1,128	-	-	-	-	-	-	-	-	-	-	-	-
03/19/01	144,170	990,069	1,590	-	-	-	-	-	-	-	-	-	-	-	-
04/09/01	167,050	1,012,949	1,090	378	<0.18	<0.14	<0.18	<0.26	475	4,040	191	4	42	38	4,990
04/13/01	169,210	1,015,109	540	Shut down system for replacement of carbon drums											
04/18/01	169,210	1,015,109	-	Restart system		-	-	-	-	-	-	-	-	-	-
04/23/01	177,140	1,023,039	1,586	93	<0.18	<0.14	<0.18	<0.26	132	1,400	<0.18	<0.14	<0.18	<0.26	3,240
05/02/01	186,800	1,032,699	1,073	Shut down system for carbon change											
05/18/01	186,900	1,032,799	6	Restart system		-	-	-	-	-	-	-	-	-	-
05/30/01	200,850	1,046,749	1,163	<50	<0.18	<0.14	<0.18	<0.26	<0.24	3,100	15	<0.14	1	2	*8,510 / 5,780
06/25/01	266,720	1,112,619	2,533	-	-	-	-	-	-	-	-	-	-	-	-
07/09/01	278,760	1,124,659	860	<50	<0.18	<0.14	<0.18	<0.26	<0.24	748	15	<0.14	2	2.7	1,440
08/13/01	399,700	1,245,599	3,455	-	-	-	-	-	-	-	-	-	-	-	-
09/24/01	451,240	1,297,139	1,227	-	-	-	-	-	-	-	-	-	-	-	-
10/01/01	488,310	1,334,209	5,296	<50	<0.18	<0.14	<0.18	<0.26	<0.24	956	1.2	<0.14	<0.18	<0.26	878
11/12/01	636,260	1,482,159	3,523	-	-	-	-	-	-	-	-	-	-	-	-
12/31/01	674,080	1,519,979	772	-	-	-	-	-	-	-	-	-	-	-	-
01/14/02	688,450	1,534,349	1,026	<50	<0.18	<0.14	<0.18	<0.26	<0.24	232	1	1	<0.18	<0.26	363
02/18/02	738,420	1,584,319	1,428	-	-	-	-	-	-	-	-	-	-	-	-
03/25/02	814,570	1,660,469	2,176	-	-	-	-	-	-	-	-	-	-	-	-
04/08/02	828,510	1,674,409	996	<50	<0.18	<0.14	<0.18	<0.26	<0.24	105	<0.18	<0.14	<0.18	<0.26	157
04/22/02	895,910	1,741,809	4,814	-	-	-	-	-	-	-	-	-	-	-	-
05/06/02	895,920	1,741,819	1	System off, Restart											
05/13/02	929,130	1,775,029	4,744	-	-	-	-	-	-	-	-	-	-	-	-
06/03/02	-	1,839,639	-	-	<0.5	<0.7	<0.8	<3.3	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
06/03/02	993,740	1,839,639	3,077	<50	<0.18	<0.14	<0.18	<0.26	<0.24						
06/24/02	1,001,590	1,847,489	374	-	-	-	-	-	-	-	-	-	-	-	-
07/08/02	-	1,847,489	-	<50	<0.18	<0.14	<0.18	<0.26	<0.24	4,710	1	1.2	<0.18	2	6,980
07/12/02	1,051,430	1,897,329	2,769	-	-	-	-	-	-	-	-	-	-	-	-
07/29/02	1,052,820	1,898,719	82	System shut down for carbon change											
08/16/02	1,052,820	1,898,719	-	Restart		-	-	-	-	-	-	-	-	-	-
08/30/02	1,069,050	1,914,949	1,159	-	-	-	-	-	-	-	-	-	-	-	-
09/20/02	-	1,952,309	-	-	<0.5	<0.7	<0.8	<3.3	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
09/20/02	1,106,410	1,952,309	1,779	<50	<0.1	<0.15	<0.06	-	-						
09/30/02	1,110,180	1,956,079	377	-	-	-	-	-	-	-	-	-	-	-	-
10/07/02	1,114,720	1,960,619	649	<50	<0.18	<0.14	<0.18	<0.26	<0.24	128	<0.18	<0.14	<0.18	<0.26	95
10/28/02	1,127,540	1,973,439	610	-	-	-	-	-	-	-	-	-	-	-	-
11/25/02	1,149,730	1,995,629	793	-	-	-	-	-	-	-	-	-	-	-	-
12/20/02	1,166,840	2,012,739	684	-	-	-	-	-	-	-	-	-	-	-	-
12/30/02	1,173,420	2,019,319	658	-	-	-	-	-	-	-	-	-	-	-	-
01/06/03	1,182,610	2,028,509	1,313	<50	<0.14	1.2	<0.08	2.4	<2.0	9,860	<1.4	29	14	2,420	205
01/13/03	1,189,320	2,035,219	959	Shut down for QWS											
01/15/03	1,189,320	2,035,219	-	Restart		-	-	-	-	-	-	-	-	-	-
02/24/03	1,223,450	2,069,349	853	-	-	-	-	-	-	-	-	-	-	-	-
03/10/03	1,238,640	2,084,539	1,085	-	-	-	-	-	-	-	-	-	-	-	-
03/17/03	1,257,710	2,103,609	2,724	System off											

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET / EFFLUENT						INLET / INFLUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
03/28/03	1,257,710	2,103,609	-	Restart	-	-	-	-	-	-	-	-	-	-	-
03/31/03	1,266,150	2,112,049	2,813	-	-	-	-	-	-	-	-	-	-	-	-
04/02/03	1,272,100	2,117,999	2,975	-	-	-	-	-	-	-	-	-	-	-	-
04/07/03	1,286,160	2,132,059	2,812	<15	<0.04	2.2	<0.02	<0.06	<0.03	14,000	20	20	2.2	14	9,090
04/14/03	1,294,060	2,139,959	1,129	System shut down for QWS						-	-	-	-	-	-
04/16/03	1,294,080	2,139,979	10	Restart	-	-	-	-	-	-	-	-	-	-	-
04/21/03	1,299,660	2,145,559	1,116	-	-	-	-	-	-	-	-	-	-	-	-
04/28/03	1,302,140	2,148,039	354	-	-	-	-	-	-	-	-	-	-	-	-
05/05/03	1,302,710	2,148,609	81	System shut down for carbon change						-	-	-	-	-	-
05/07/03	1,302,710	2,148,609	-	Restart	-	-	-	-	-	-	-	-	-	-	-
05/12/03	1,303,230	2,149,129	104	-	-	-	-	-	-	-	-	-	-	-	-
05/19/03	1,318,460	2,164,359	2,176	-	-	-	-	-	-	-	-	-	-	-	-
05/30/03	1,321,830	2,167,729	306	-	-	-	-	-	-	-	-	-	-	-	-
06/02/03	1,327,490	2,173,389	1,887	-	-	-	-	-	-	-	-	-	-	-	-
06/09/03	1,336,370	2,182,269	1,269	-	-	-	-	-	-	-	-	-	-	-	-
06/16/03	1,347,480	2,193,379	1,587	-	-	-	-	-	-	-	-	-	-	-	-
06/23/03	1,359,690	2,205,589	1,744	-	-	-	-	-	-	-	-	-	-	-	-
07/01/03	1,366,090	2,211,989	800	-	-	-	-	-	-	-	-	-	-	-	-
07/07/03	1,369,730	2,215,629	607	System shut down for QWS						-	-	-	-	-	-
07/15/03	1,369,730	2,215,629	-	Restart	-	-	-	-	-	-	-	-	-	-	-
07/21/03	1,382,630	2,228,529	2,150	<15	<0.04	1.0	<0.02	<0.06	<0.03	7,710	<0.04	<0.02	<0.02	<0.06	3,550
07/28/03	1,389,840	2,235,739	1,030	-	-	-	-	-	-	-	-	-	-	-	-
08/04/03	1,408,710	2,254,609	2,696	-	-	-	-	-	-	-	-	-	-	-	-
08/15/03	1,411,520	2,257,419	255	System shut down for carbon change						-	-	-	-	-	-
08/29/03	1,411,560	2,257,459	3	Restart	-	-	-	-	-	-	-	-	-	-	-
09/03/03	1,419,210	2,265,109	1,530	-	-	-	-	-	-	-	-	-	-	-	-
09/12/03	1,423,520	2,269,419	479	-	-	-	-	-	-	-	-	-	-	-	-
09/15/03	1,427,810	2,273,709	1,430	-	-	-	-	-	-	-	-	-	-	-	-
09/22/03	1,429,700	2,275,599	270	System shut down for installation of new 24-hour timer						-	-	-	-	-	-
09/26/03	1,429,700	2,275,599	-	Restart	-	-	-	-	-	-	-	-	-	-	-
09/29/03	1,430,560	2,276,459	287	-	-	-	-	-	-	-	-	-	-	-	-
10/06/03	1,431,140	2,277,039	83	System shut down for QWS						-	-	-	-	-	-
10/08/03	1,431,140	2,277,039	-	Restart	-	-	-	-	-	-	-	-	-	-	-
10/10/03	-	-	-	-	<0.50	<0.70	<0.80	<3.30	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
10/10/03	1,432,290	2,278,189	575	<15	<0.04	<0.02	<0.02	<0.06	<0.03	16,200	<0.04	4.4	4.8	46	8,700
10/17/03	1,433,790	2,279,689	214	-	-	-	-	-	-	-	-	-	-	-	-
10/22/03	-	-	-	-	<0.50	<0.70	<0.80	<3.30	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
10/22/03	1,434,590	2,280,489	160	<15	<0.04	<0.02	<0.02	<0.06	<0.03	Split-sample results (sample collected by us)					
10/27/03	1,435,610	2,281,509	204	-	-	-	-	-	-	-	-	-	-	-	-
11/03/03	1,438,740	2,284,639	447	-	-	-	-	-	-	-	-	-	-	-	-
11/14/03	1,443,620	2,289,519	444	-	-	-	-	-	-	-	-	-	-	-	-
11/21/03	1,447,510	2,293,409	556	-	-	-	-	-	-	-	-	-	-	-	-
12/05/03	1,452,410	2,298,309	350	-	-	-	-	-	-	-	-	-	-	-	-
12/09/03	1,458,320	2,304,219	1,478	-	-	-	-	-	-	-	-	-	-	-	-
12/17/03	1,462,410	2,308,309	511	-	-	-	-	-	-	-	-	-	-	-	-
12/26/03	1,468,630	2,314,529	691	-	-	-	-	-	-	-	-	-	-	-	-
12/31/03	1,469,710	2,315,609	216	-	-	-	-	-	-	-	-	-	-	-	-
01/06/04	1,472,000	2,317,899	382	<15	<0.04	<0.02	<0.02	<0.06	<0.03	7,900	658	1,560	62	1,090	2,170
01/14/04	1,474,650	2,320,549	331	System shut down for QWS; Restarted 1/15/04						-	-	-	-	-	-
01/28/04	-	-	-	-	<0.50	<0.70	<0.80	<3.30	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
01/28/04	1,485,790	2,331,689	857	<15	<0.04	<0.02	<0.02	<0.06	<0.03	Split-sample results (sample collected by us)					
02/04/04	1,492,340	2,338,239	936	-	-	-	-	-	-	-	-	-	-	-	-
02/10/04	1,494,550	2,340,449	368	-	-	-	-	-	-	-	-	-	-	-	-
02/20/04	1,498,790	2,344,689	424	-	-	-	-	-	-	-	-	-	-	-	-

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (Gal/day)	OUTLET/EFFLUENT						INLET/INFILUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
02/25/04	1,499,360	2,345,259	114	-	-	-	-	-	-	-	-	-	-	-	-
03/03/04	1,514,700	2,360,599	2,191	-	-	-	-	-	-	-	-	-	-	-	-
03/09/04	1,517,300	2,363,199	433	-	-	-	-	-	-	-	-	-	-	-	-
03/17/04	1,519,100	2,364,999	225	-	-	-	-	-	-	-	-	-	-	-	-
03/24/04	1,524,600	2,370,499	786	-	-	-	-	-	-	-	-	-	-	-	-
04/01/04	1,529,300	2,375,199	588	-	-	-	-	-	-	-	-	-	-	-	-
04/07/04	1,531,200	2,377,099	317	<15	<0.22	<0.32	<0.31	<0.4	<0.18	1,380	113	93	16	76	191
04/14/04	1,533,000	2,378,899	257	System shut down for QWS on 4/7; Restarted 4/14											
04/22/04	1,576,400	2,422,299	5,425	-	-	-	-	-	-	-	-	-	-	-	-
04/28/04	1,623,500	2,469,399	7,850	-	-	-	-	-	-	-	-	-	-	-	-
05/06/04	1,668,920	2,514,819	5,678	-	-	-	-	-	-	-	-	-	-	-	-
05/13/04	1,691,100	2,536,999	3,169	-	-	-	-	-	-	-	-	-	-	-	-
05/20/04	1,726,500	2,572,399	5,057	-	-	-	-	-	-	-	-	-	-	-	-
05/28/04	1,748,910	2,594,809	2,801	-	-	-	-	-	-	-	-	-	-	-	-
06/04/04	1,749,320	2,595,219	59	Found system off; for replacement of on and off switch											
06/11/04	1,749,320	2,595,219	-	Restarted											
06/16/04	1,751,910	2,597,809	518	-	-	-	-	-	-	-	-	-	-	-	-
06/22/04	1,753,550	2,599,449	273	-	-	-	-	-	-	-	-	-	-	-	-
07/02/04	1,756,530	2,602,429	298	-	-	-	-	-	-	-	-	-	-	-	-
07/08/04	1,759,110	2,605,009	430	<15	<0.22	<0.32	<0.31	<0.4	<0.18	652	31	<0.32	<0.31	2.1J	383
07/15/04	1,759,260	2,605,159	21	-	-	-	-	-	-	-	-	-	-	-	-
07/22/04	1,760,630	2,606,529	196	-	-	-	-	-	-	-	-	-	-	-	-
07/28/04	1,762,810	2,608,709	363	Shut down system for carbon change											
08/05/04	1,762,810	2,608,709	-	Restarted											
08/12/04	1,765,370	2,611,269	366	-	-	-	-	-	-	-	-	-	-	-	-
08/20/04	1,767,950	2,613,849	323	-	-	-	-	-	-	-	-	-	-	-	-
08/27/04	1,771,100	2,616,999	450	-	-	-	-	-	-	-	-	-	-	-	-
09/03/04	1,773,750	2,619,649	379	-	-	-	-	-	-	-	-	-	-	-	-
09/07/04	1,777,590	2,623,489	960	-	-	-	-	-	-	-	-	-	-	-	-
09/10/04	1,778,460	2,624,359	290	Shut down system due to operator vacation											
09/29/04	1,778,460	2,624,359	-	Restarted											
10/06/04	1,779,260	2,625,159	114	<15	<0.22	<0.32	<0.31	<0.4	<0.18	<15	<0.22	<0.32	<0.31	<0.4	20
10/12/04	1,782,540	2,628,439	547	Shut down system for QWS											
10/21/04	1,782,680	2,628,579	16	Restarted											
10/27/04	1,784,630	2,630,529	325	-	-	-	-	-	-	-	-	-	-	-	-
11/03/04	1,784,680	2,630,579	7	-	-	-	-	-	-	-	-	-	-	-	-
11/11/04	1,787,490	2,633,389	351	-	-	-	-	-	-	-	-	-	-	-	-
11/19/04	1,789,350	2,635,249	233	-	-	-	-	-	-	-	-	-	-	-	-
12/01/04	1,789,800	2,635,699	38	-	-	-	-	-	-	-	-	-	-	-	-
12/10/04	1,792,780	2,638,679	331	-	-	-	-	-	-	-	-	-	-	-	-
12/15/04	1,795,460	2,641,359	536	-	-	-	-	-	-	-	-	-	-	-	-
12/22/04	1,798,000	2,643,899	363	-	-	-	-	-	-	-	-	-	-	-	-
12/29/04	1,800,580	2,646,479	369	-	-	-	-	-	-	-	-	-	-	-	-
01/05/05	1,803,140	2,649,039	366	<15	<0.22	<0.32	<0.31	<0.4	<0.18	291	9.1	<0.32	1.2 J	<0.4	72
01/13/05	1,803,290	2,649,189	19	System turned off for QWS on 1/5/05; Restarted on 1/13/05											
01/20/05	1,804,020	2,649,919	104	Shut down system for repair and upgrade											
04/30/05	1,804,020	2,649,919	-	System still off pending repairs and upgrade											
05/10/05	1,804,020	2,649,919	-	Restarted system with MW-3 only											
05/20/05	1,805,010	2,650,909	99	Added MW-4 to the system											
05/26/05	1,807,630	2,653,529	437	-	-	-	-	-	-	-	-	-	-	-	-
06/03/05	1,812,100	2,657,999	559	-	-	-	-	-	-	-	-	-	-	-	-
06/10/05	1,816,540	2,662,439	634	-	-	-	-	-	-	-	-	-	-	-	-
06/17/05	1,819,870	2,665,769	476	Compressor needs repair											
06/24/05	1,823,140	2,669,039	467	Replace with new pump MW-3											

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET / EFFLUENT						INLET / INFLUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
06/29/05	1,827,540	2,673,439	880	-	-	-	-	-	-	-	-	-	-	-	-
07/08/05	1,829,830	2,675,729	254	-	-	-	-	-	-	-	-	-	-	-	-
07/14/05	1,829,970	2,675,869	23	<2.9	<0.17	<0.22	<0.14	<0.38	-	4,270	130	3.6 J	348	188	2,790
07/22/05	1,832,760	2,678,659	349	-	-	-	-	-	-	-	-	-	-	-	-
07/26/05	1,833,920	2,679,819	290	Shut down system for QWS	-	-	-	-	-	-	-	-	-	-	-
08/05/05	1,833,970	2,679,869	5	Restart system after QWS	-	-	-	-	-	-	-	-	-	-	-
08/09/05	1,836,930	2,682,829	740	-	-	-	-	-	-	-	-	-	-	-	-
08/19/05	1,837,560	2,683,459	63	-	<0.10	<0.15	<0.06	<0.40	-	Split-sample results during EBMUD inspection & sampling					
08/25/05	1,837,920	2,683,819	60	Shut down system for carbon change	-	-	-	-	-	-	-	-	-	-	-
09/01/05	1,837,980	2,683,879	9	Restarted	-	-	-	-	-	-	-	-	-	-	-
09/09/05	1,838,530	2,684,429	69	-	-	-	-	-	-	-	-	-	-	-	-
09/16/05	1,841,230	2,687,129	386	-	-	-	-	-	-	-	-	-	-	-	-
09/23/05	1,843,410	2,689,309	311	-	-	-	-	-	-	-	-	-	-	-	-
09/30/05	1,844,820	2,690,719	201	-	-	-	-	-	-	-	-	-	-	-	-
10/06/05	1,845,250	2,691,149	72	<2.9	<0.10	<0.15	<0.06	<0.40	-	2,410	<3.2	<1.0	28 J	<3.0	1,990
10/11/05	1,846,030	2,691,929	156	System turned off for QWS on 10/11/05; Restarted on 10/14/05	-	-	-	-	-	-	-	-	-	-	-
10/14/05	-	-	-	-	<0.05	<0.07	<0.08	<0.33	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
10/14/05	1,846,590	2,692,489	187	-	<0.10	<0.15	<0.06	<0.40	-	Split-sample results during EBMUD inspection & sampling					
10/21/05	1,847,810	2,693,709	174	-	-	-	-	-	-	-	-	-	-	-	-
11/02/05	1,849,720	2,695,619	159	-	-	-	-	-	-	-	-	-	-	-	-
11/08/05	-	-	-	-	<0.05	0.62	<0.08	<0.33	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
11/10/05	1,850,760	2,696,659	130	-	-	-	-	-	-	-	-	-	-	-	-
11/17/05	1,851,420	2,697,319	94	-	-	-	-	-	-	-	-	-	-	-	-
11/23/05	1,854,560	2,700,459	523	-	-	-	-	-	-	-	-	-	-	-	-
11/30/05	1,856,650	2,702,549	299	-	-	-	-	-	-	-	-	-	-	-	-
12/09/05	1,858,340	2,704,239	188	-	-	-	-	-	-	-	-	-	-	-	-
12/15/05	1,859,780	2,705,679	240	-	-	-	-	-	-	-	-	-	-	-	-
12/22/05	1,860,420	2,706,319	91	-	-	-	-	-	-	-	-	-	-	-	-
12/30/05	1,862,470	2,708,369	256	-	-	-	-	-	-	-	-	-	-	-	-
01/06/06	1,866,760	2,712,659	613	-	-	-	-	-	-	-	-	-	-	-	-
01/11/06	1,867,740	2,713,639	196	698	<0.32	<0.10	<0.24	<0.30	-	6,120	210	<0.10	419	130	649
01/18/06	1,870,240	2,716,139	357	Shut down system for QWS and carbon change	-	-	-	-	-	-	-	-	-	-	-
01/27/06	1,870,280	2,716,179	4	Restarted after QWS and carbon change	-	-	-	-	-	-	-	-	-	-	-
02/01/06	-	-	-	-	<0.70	<0.67	<0.65	<2.0	-	Outlet sampling results from EBMUD (sample collected by EBMUD inspector)					
02/01/06	1,870,530	2,716,429	50	-	<0.17	<0.22	<0.14	<0.38	-	Split-sample results during EBMUD inspection & sampling					
02/10/06	1,877,370	2,723,269	760	-	-	-	-	-	-	-	-	-	-	-	-
02/17/06	1,879,230	2,725,129	266	-	-	-	-	-	-	-	-	-	-	-	-
02/24/06	1,880,710	2,726,609	211	-	-	-	-	-	-	-	-	-	-	-	-
03/01/06	1,882,270	2,728,169	312	-	-	-	-	-	-	-	-	-	-	-	-
03/10/06	1,889,370	2,735,269	789	-	-	-	-	-	-	-	-	-	-	-	-
03/17/06	1,889,660	2,735,559	41	-	-	-	-	-	-	-	-	-	-	-	-
03/21/06	1,890,930	2,736,829	318	-	-	-	-	-	-	-	-	-	-	-	-
03/29/06	1,891,880	2,737,779	119	-	-	-	-	-	-	-	-	-	-	-	-
04/05/06	1,893,340	2,739,239	209	<5.6	<0.32	<0.10	<0.24	<0.30	-	1,520	72	<0.10	199	28	129
04/11/06	1,895,480	2,741,379	357	-	-	-	-	-	-	-	-	-	-	-	-
04/11/06	-	-	2,741,379	Shut down system for QWS	-	-	-	-	-	-	-	-	-	-	-
04/14/06	1,895,490	2,741,389	3	Restart system after QWS	-	-	-	-	-	-	-	-	-	-	-
04/21/06	1,897,130	2,743,029	234	-	-	-	-	-	-	-	-	-	-	-	-
04/26/06	1,898,330	2,744,229	240	-	-	-	-	-	-	-	-	-	-	-	-
05/03/06	1,900,240	2,746,139	273	-	-	-	-	-	-	-	-	-	-	-	-
05/12/06	1,903,700	2,749,599	384	-	-	-	-	-	-	-	-	-	-	-	-
05/19/06	1,905,570	2,751,469	267	-	-	-	-	-	-	-	-	-	-	-	-
05/23/06	1,907,810	2,753,709	560	<5.6	<0.32	<0.10	<0.24	<0.30	-	683,000	3,600	135,000	25,100	165,000	-
05/26/06	1,909,780	2,755,679	657	-	-	-	-	-	-	-	-	-	-	-	-

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET / EFFLUENT						INLET / INFLUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
06/02/06	1,911,010	2,756,909	176	-	-	-	-	-	-	-	-	-	-	-	-
06/09/06	1,912,670	2,758,569	237	-	-	-	-	-	-	77,300	668	19,300	1,660	8,800	-
06/16/06	1,914,330	2,760,229	237	-	-	-	-	-	-	-	-	-	-	-	-
06/23/06	1,917,210	2,763,109	411	-	-	-	-	-	-	-	-	-	-	-	-
06/27/06	1,919,740	2,765,639	633	-	-	-	-	-	-	-	-	-	-	-	-
07/06/06	1,921,470	2,767,369	192	3,730	44	874	26	503	16	4,450	8.6 J	99	34 J	149	2,780
07/14/06	1,921,980	2,767,879	64	-	-	-	-	-	-	-	-	-	-	-	-
07/18/06	1,922,070	2,767,969	23	Shut down system for carbon change						-	-	-	-	-	-
08/04/06	1,922,090	2,767,989	1	System restarted after carbon change						-	-	-	-	-	-
08/04/06	1,922,090	2,767,989	1	<5.6	<0.32	<0.10	<0.24	<0.30	-	763	<0.32	<0.10	<0.24	<0.30	1040
08/18/06	1,928,690	2,774,589	471	-	-	-	-	-	-	-	-	-	-	-	-
08/25/06	1,929,580	2,775,479	127	-	-	-	-	-	-	-	-	-	-	-	-
09/01/06	1,932,440	2,778,339	409	-	-	-	-	-	-	-	-	-	-	-	-
09/08/06	1,936,240	2,782,139	543	-	-	-	-	-	-	-	-	-	-	-	-
09/14/06	1,938,420	2,784,319	363	-	-	-	-	-	-	-	-	-	-	-	-
09/20/06	1,939,710	2,785,609	215	-	-	-	-	-	-	-	-	-	-	-	-
10/04/06	1,942,100	2,787,999	171	<5.6	<0.32	<0.10	<0.24	1.1 J	-	14,400	78	1,110	440	1,440	1,420
10/13/06	1,945,320	2,791,219	358	-	-	-	-	-	-	-	-	-	-	-	-
10/19/06	1,947,230	2,793,129	318	-	-	-	-	-	-	-	-	-	-	-	-
10/24/06	1,948,670	2,794,569	288	Shut down system for QWS						-	-	-	-	-	-
10/27/06	1,948,670	2,794,569	-	Restart system after QWS						-	-	-	-	-	-
11/01/06	1,949,120	2,795,019	90	-	-	-	-	-	-	-	-	-	-	-	-
11/09/06	1,951,030	2,796,929	239	-	-	-	-	-	-	-	-	-	-	-	-
11/16/06	1,951,817	2,797,716	112	-	-	-	-	-	-	-	-	-	-	-	-
11/22/06	1,952,010	2,797,909	32	-	-	-	-	-	-	-	-	-	-	-	-
11/30/06	1,956,730	2,802,629	590	Shut down system for maintenance						-	-	-	-	-	-
12/01/06	1,956,730	2,802,629	-	Restarted system						-	-	-	-	-	-
12/07/06	1,958,510	2,804,409	297	-	-	-	-	-	-	-	-	-	-	-	-
12/12/06	1,959,720	2,805,619	242	Shut down system due to operator vacation						-	-	-	-	-	-
01/03/07	1,959,230	2,805,129	(22)	Restarted system						-	-	-	-	-	-
01/05/07	1,959,670	2,805,569	220	-	-	-	-	-	-	-	-	-	-	-	-
01/11/07	1,961,280	2,807,179	268	-	-	-	-	-	-	-	-	-	-	-	-
01/18/07	1,963,200	2,809,099	274	System shut down for QWS						-	-	-	-	-	-
01/24/07	1,963,200	2,809,099	-	<5.6	<0.17	<0.22	<0.14	<0.38	-	8,920	<1.6	115	91	612	68
01/25/07	1,963,860	2,809,759	660	-	-	-	-	-	-	-	-	-	-	-	-
02/02/07	1,967,120	2,813,019	408	-	-	-	-	-	-	-	-	-	-	-	-
02/06/07	1,969,320	2,815,219	550	-	-	-	-	-	-	-	-	-	-	-	-
02/16/07	1,971,040	2,816,939	172	-	-	-	-	-	-	-	-	-	-	-	-
02/19/07	1,971,760	2,817,659	240	-	-	-	-	-	-	-	-	-	-	-	-
02/28/07	1,978,320	2,824,219	729	-	-	-	-	-	-	-	-	-	-	-	-
03/16/07	1,983,620	2,829,519	331	-	-	-	-	-	-	-	-	-	-	-	-
03/23/07	1,985,120	2,831,019	214	-	-	-	-	-	-	-	-	-	-	-	-
03/30/07	1,987,330	2,833,229	316	-	-	-	-	-	-	-	-	-	-	-	-
04/05/07	1,989,120	2,835,019	298	-	-	-	-	-	-	-	-	-	-	-	-
04/12/07	1,991,300	2,837,199	311	<5.6	<0.17	<0.22	<0.14	<0.38	-	6,640	43	916	296	1,810	199
04/20/07	1,992,720	2,838,619	178	Shut down system for QWS						-	-	-	-	-	-
04/27/07	1,992,730	2,838,629	1	Restart system after QWS						-	-	-	-	-	-
05/03/07	1,994,500	2,840,399	295	-	-	-	-	-	-	-	-	-	-	-	-
05/10/07	2,002,410	2,848,309	1,130	-	-	-	-	-	-	-	-	-	-	-	-
05/17/07	2,004,320	2,850,219	273	-	-	-	-	-	-	-	-	-	-	-	-
05/25/07	2,004,810	2,850,709	61	-	-	-	-	-	-	-	-	-	-	-	-
06/01/07	2,005,210	2,851,109	57	-	-	-	-	-	-	-	-	-	-	-	-
06/14/07	2,006,540	2,852,439	102	-	-	-	-	-	-	-	-	-	-	-	-
06/19/07	2,008,320	2,854,219	356	-	-	-	-	-	-	-	-	-	-	-	-
06/21/07	2,008,740	2,854,639	210	-	-	-	-	-	-	15,800	186	1,890	410	2,060	97

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET/EFFLUENT						INLET/INFILUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
06/29/07	2,016,480	2,862,379	968	-	-	-	-	-	-	-	-	-	-	-	-
07/06/07	2,014,260	2,864,599	317	-	-	-	-	-	-	-	-	-	-	-	-
07/13/07	2,013,420	2,865,439	120	-	-	-	-	-	-	-	-	-	-	-	-
07/20/07	2,015,230	2,867,249	259	-	-	-	-	-	-	-	-	-	-	-	-
07/24/07	2,015,620	2,867,639	98	Shut down system for QWS	-	-	-	-	-	-	-	-	-	-	-
07/27/07	2,015,670	2,867,689	17	Restart system after QWS	-	-	-	-	-	-	-	-	-	-	-
08/03/07	2,016,310	2,868,329	91	-	-	-	-	-	-	-	-	-	-	-	-
08/10/07	2,017,430	2,869,449	160	-	-	-	-	-	-	-	-	-	-	-	-
08/17/07	2,017,960	2,869,979	76	<5.6	<0.15	<0.12	<0.09	<0.26	-	-	-	-	-	-	-
08/24/07	2,018,100	2,870,119	20	-	-	-	-	-	-	-	-	-	-	-	-
08/31/07	2,018,210	2,870,229	16	-	-	-	-	-	-	-	-	-	-	-	-
09/07/07	2,018,630	2,870,649	60	Shut down system for repairs	-	-	-	-	-	-	-	-	-	-	-
09/14/07	2,019,810	2,871,829	169	Restart system	-	-	-	-	-	-	-	-	-	-	-
09/21/07	2,027,200	2,879,219	1,056	-	-	-	-	-	-	-	-	-	-	-	-
09/28/07	2,031,500	2,883,519	614	-	-	-	-	-	-	-	-	-	-	-	-
10/05/07	2,038,620	2,890,639	1,017	-	-	-	-	-	-	-	-	-	-	-	-
10/12/07	2,042,100	2,894,119	497	-	-	-	-	-	-	-	-	-	-	-	-
10/19/07	2,049,120	2,901,139	1,003	-	-	-	-	-	-	-	-	-	-	-	-
10/23/07	2,051,240	2,903,259	530	Shut down system for QWS	-	-	-	-	-	-	-	-	-	-	-
10/26/07	2,053,410	2,905,429	723	Restart system after QWS	-	-	-	-	-	-	-	-	-	-	-
11/06/07	2,064,180	2,916,199	979	<5.6	<0.15	<0.12	<0.09	<0.26	-	Split-sample results during EBMUD inspection & sampling					
11/20/07	2,075,400	2,927,419	801	<5.6	<0.15	<0.12	<0.09	<0.26	-	2,240	84	<0.24	46	5.7	194
11/30/07	2,082,110	2,934,129	671	-	-	-	-	-	-	-	-	-	-	-	-
12/14/07	2,086,930	2,938,949	344	-	-	-	-	-	-	3,980	102	869	229	1400	100
12/21/07	2,091,340	2,943,359	630	-	-	-	-	-	-	-	-	-	-	-	-
12/28/07	2,094,210	2,946,229	410	-	-	-	-	-	-	-	-	-	-	-	-
01/04/08	2,097,490	2,949,509	469	-	-	-	-	-	-	-	-	-	-	-	-
01/11/08	2,106,370	2,958,389	1,269	Shut down system for QWS	-	-	-	-	-	-	-	-	-	-	-
01/15/08	-	-	-	<5.6	<0.15	<0.12	<0.09	<0.26	-	804	54	3.2 J	45	11	128
01/25/08	2,109,820	2,961,839	246	Restart system after QWS	-	-	-	-	-	-	-	-	-	-	-
02/01/08	2,119,680	2,971,699	1,409	-	-	-	-	-	-	-	-	-	-	-	-
02/08/08	2,129,200	2,981,219	1,360	-	-	-	-	-	-	97,800	183	16,900	3,510	20,400	<1.9
02/15/08	2,138,190	2,990,209	1,284	-	-	-	-	-	-	-	-	-	-	-	-
02/22/08	2,139,640	2,991,659	207	-	-	-	-	-	-	-	-	-	-	-	-
02/29/08	2,143,260	2,995,279	517	-	-	-	-	-	-	-	-	-	-	-	-
03/05/08	2,148,020	3,000,039	952	-	-	-	-	-	-	-	-	-	-	-	-
03/14/08	2,163,950	3,015,969	1,770	-	-	-	-	-	-	6,160	36	1,070	18	1,290	27
03/26/08	2,164,230	3,016,249	23	-	-	-	-	-	-	-	-	-	-	-	-
03/27/08	2,165,320	3,017,339	1,090	-	-	-	-	-	-	-	-	-	-	-	-
04/23/08	2,165,360	3,017,379	1	<6.6	<0.15	<0.12	<0.09	<0.26	-	-	-	-	-	-	-
05/02/08	2,174,340	3,026,359	998	-	-	-	-	-	-	-	-	-	-	-	-
05/09/08	2,196,620	3,048,639	3,183	-	-	-	-	-	-	-	-	-	-	-	-
05/16/08	2,196,620	3,048,639	-	-	-	-	-	-	-	-	-	-	-	-	-
05/23/08	2,196,620	3,048,639	-	-	-	-	-	-	-	-	-	-	-	-	-
06/05/08	2,196,620	3,048,639	-	-	-	-	-	-	-	-	-	-	-	-	-
06/10/08	2,198,960	3,050,979	468	-	-	-	-	-	-	-	-	-	-	-	-
06/20/08	2,205,410	3,057,429	645	-	-	-	-	-	-	-	-	-	-	-	-
06/25/08	2,213,010	3,065,029	1,520	-	-	-	-	-	-	26,600	54	721	629	4,320	<0.19
07/03/08	2,221,620	3,073,639	1,076	-	-	-	-	-	-	-	-	-	-	-	-
07/09/08	2,230,580	3,082,599	1,493	<6.6	<0.18	<0.24	<0.21	<0.45	-	6,220	103	655	188	1,040	<1.9
07/18/08	2,231,140	3,083,159	62	-	-	-	-	-	-	-	-	-	-	-	-
07/25/08	2,237,110	3,089,129	853	-	-	-	-	-	-	-	-	-	-	-	-
08/04/08	2,237,120	3,089,139	1	-	-	-	-	-	-	-	-	-	-	-	-
08/08/08	2,240,350	3,092,369	808	-	-	-	-	-	-	9,480	65	1,080	375	2,120	<0.19

TABLE 1
GROUNDWATER REMEDIATION SYSTEM MONITORING PROGRAM
 Thrifty Oil Co. Station No 063, OAKLAND, CA

Date	Totalizer (gallons)	Total/Cum. Discharge (gallons)	Flow (gal/day)	OUTLET / EFFLUENT						INLET / INFLUENT					
				TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L	TPH-g ug/L	B ug/L	T ug/L	E ug/L	X ug/L	MTBE ug/L
08/22/08	2,249,810	3,101,829	676	-	-	-	-	-	-	-	-	-	-	-	-
08/24/08	2,255,420	3,107,439	2,805	-	-	-	-	-	-	-	-	-	-	-	-
09/04/08	2,261,960	3,113,979	595	-	-	-	-	-	-	-	-	-	-	-	-
09/11/08	2,264,120	3,116,139	309	-	-	-	-	-	-	-	-	-	-	-	-
09/18/08	2,270,870	3,122,889	964	-	-	-	-	-	-	-	-	-	-	-	-
09/24/08	2,270,960	3,122,979	15	<6.6	<0.18	<0.24	<0.21	<0.45	-	Split-sample results during EBMUD inspection & sampling					
09/26/08	2,272,540	3,124,559	790	-	-	-	-	-	-	-	-	-	-	-	-
10/03/08	2,280,060	3,132,079	1,074	-	-	-	-	-	-	-	-	-	-	-	-
10/08/08	2,286,630	3,138,649	1,314	-	-	-	-	-	-	-	-	-	-	-	-
10/16/08	2,294,110	3,146,129	935	-	-	-	-	-	-	-	-	-	-	-	-
10/28/08	2,307,750	3,159,769	1,137	-	-	-	-	-	-	8490	100	1130	308	1680	11
11/07/08	2,316,370	3,168,389	862	-	-	-	-	-	-	-	-	-	-	-	-
11/14/08	2,322,890	3,174,909	931	-	-	-	-	-	-	-	-	-	-	-	-
11/21/08	2,330,420	3,182,439	1,076	-	-	-	-	-	-	-	-	-	-	-	-
11/26/08	2,337,570	3,189,589	1,430	-	-	-	-	-	-	-	-	-	-	-	-
12/05/08	2,344,350	3,196,369	753	-	-	-	-	-	-	-	-	-	-	-	-
12/10/08	2,351,080	3,203,099	1,346	-	-	-	-	-	-	-	-	-	-	-	-
12/18/08	2,358,770	3,210,789	961	-	-	-	-	-	-	-	-	-	-	-	-
12/19/08	2,358,920	3,210,939	150	-	-	-	-	-	-	-	-	-	-	-	-
12/23/08	2,366,510	3,218,529	1,898	<6.6	<0.18	<0.24	<0.21	<0.45	-	8230	60	1730	279	1720	3.8

WD PERMIT LIMITS:	NE	5.0	5.0	5.0	5.0	NE
-------------------	----	-----	-----	-----	-----	----

Note:

< = less than laboratory detection level indicated

- = no sample / not analyzed

NE = Permit Limit not established

TPH is analyzed by EPA Method 8015 M

BTEX is analyzed by EPA Method 8021 or 8260

*MTBE by 8020 / 8260

In February 2000, the total cumulative discharge amount was corrected to reflect all system maintenance and flowmeter changeouts since the startup of the system. The total number may be different from previous versions of this table.

TABLE 2
GROUNDWATER DATA FOR GROUNDWATER EXTRACTION WELLS MW-3 AND MW-4
THRIFTY OIL STATION #063, OAKLAND, CA

DATE GAUGED	DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
MONITORING WELL #MW-3 (GROUNDWATER SYSTEMS PUMPING WELL)					
11/21/86	0.10	16.25	16.15	99.76	95.70
07/22/91	NP	24.00	0.00	99.76	75.76
10/24/91	NP	18.10	0.00	99.76	81.66
01/22/92	SHEEN	25.80	0.00	99.76	73.96
03/24/92	NP	15.60	0.00	99.76	84.16
07/15/92	FILM	25.10	0.00	99.76	74.66
10/05/92	NP	25.20	0.00	99.76	74.56
01/06/93	NP	25.45	0.00	99.76	74.31
07/13/93	NP	14.24	0.00	99.76	85.52
10/11/93	NP	25.60	0.00	99.76	74.16
01/11/94	NP	25.90	0.00	99.76	73.86
04/12/94	NP	25.70	0.00	99.76	74.06
07/14/94	NP	25.10	0.00	99.76	74.66
01/15/96	NP	26.04	0.00	99.76	73.72
04/15/96	NP	21.03	0.00	99.76	78.73
07/15/96		#N/A	-	-	-
10/09/96	NP	21.43	0.00	99.76	78.33
01/13/97	NP	11.20	0.00	99.76	88.56
07/07/97	NP	23.40	0.00	99.76	76.36
10/16/97	NP	22.30	0.00	99.76	77.46
01/07/98	NP	20.10	0.00	99.76	79.66
07/14/98	NP	14.40	0.00	99.76	85.36
10/15/98		#N/A	-	-	-
01/20/99		#N/A	-	-	-
04/16/99	NP	11.20	0.00	99.76	88.56
07/14/99	NP	25.87	0.00	99.76	73.89
10/07/99	NP	15.40	0.00	99.76	84.36
01/26/00	NP	14.25	0.00	99.76	85.51

TABLE 2
GROUNDWATER DATA FOR GROUNDWATER EXTRACTION WELLS MW-3 AND MW-4
THRIFTY OIL STATION #063, OAKLAND, CA

DATE GAUGED	DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
04/19/00	NP	14.20	0.00	99.76	85.56
05/26/00	NP	15.12	0.00	99.76	84.64
07/26/00	NP	14.30	0.00	99.76	85.46
10/25/00	NP	14.32	0.00	99.76	85.44
01/10/01	NP	13.46	0.00	99.76	86.30
04/23/01		#N/A	-	-	-
07/16/01	NP	12.80	0.00	99.76	86.96
10/17/01	NP	15.30	0.00	99.76	84.46
01/23/02		#N/A	-	-	-
04/10/02	NP	13.22	0.00	99.76	86.54
07/24/02	NP	14.32	0.00	99.76	85.44
10/30/02	NP	16.20	0.00	99.76	83.56
01/15/03	NP	14.10	0.00	99.76	85.66
04/16/03		#N/A	-	99.76	-
07/14/03	NP	18.30	0.00	99.76	81.46
10/08/03	NP	16.65	0.00	99.76	83.11
01/15/04	NP	14.18	0.00	99.76	85.58
04/14/04	NP	13.45	0.00	99.76	86.32
07/29/04	NP	15.94	0.00	99.76	83.82
10/14/04	NP	16.11	0.00	99.76	83.65
01/06/05	NP	15.61	0.00	99.76	84.15
04/13/05	NP	9.19	0.00	99.76	90.57
07/27/05	NP	16.63	0.00	99.76	83.13
10/12/05	NP	16.97	0.00	99.76	82.79
01/19/06	NP	10.92	0.00	99.76	88.84
04/12/06	NP	12.55	0.00	99.76	87.21

TABLE 2
GROUNDWATER DATA FOR GROUNDWATER EXTRACTION WELLS MW-3 AND MW-4
THRIFTY OIL STATION #063, OAKLAND, CA

DATE GAUGED	DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	PRODUCT ELEVATION (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
07/26/06	NP	14.94	0.00	99.76	84.82	
10/25/06	NP	17.49	0.00	99.76	82.27	
01/24/07	NP	13.40	0.00	148.94	135.54	
04/24/07	NP	16.76	0.00	148.94	132.18	
07/25/07	NP	15.72	0.00	148.94	133.22	
10/24/07	NP	15.43	0.00	148.94	133.51	
01/23/08	NP	15.43	0.00	148.94	133.51	
04/29/08	NP	16.30	0.00	148.94	132.64	
07/30/08	NP	15.61	0.00	148.94	133.33	
10/29/08	NP	15.42	0.00	148.94	133.52	
MONITORING WELL #MM-4						
11/21/86	FILM	16.22	0.00	99.48	83.26	
07/22/91	21.35	21.80	0.45	99.48	78.02	
10/24/91	SHEEN	20.02	0.00	99.48	79.46	
01/22/92	SHEEN	19.78	0.00	99.48	79.70	
03/24/92	FILM	13.94	0.00	99.48	85.54	
07/15/92	FILM	19.27	0.00	99.48	80.21	
10/05/92	FILM	21.44	0.00	99.48	78.04	
01/06/93	FILM	14.08	0.00	99.48	85.40	
07/13/93	FILM	16.09	0.00	99.48	83.39	
10/11/93	FILM	21.33	0.00	99.48	78.15	
01/11/94	FILM	20.45	0.00	99.48	79.03	
04/12/94	FILM	19.05	0.00	99.48	80.43	
07/14/94	FILM	20.41	0.00	99.48	79.07	
01/15/96	NP	19.89	0.00	99.48	79.59	
04/15/96	NP	19.62	0.00	99.48	79.86	
07/15/96		#N/A	-	-	-	
10/09/96	NP	15.32	0.00	99.48	84.16	
01/13/97	NP	10.80	0.00	99.48	88.68	

TABLE 2
GROUNDWATER DATA FOR GROUNDWATER EXTRACTION WELLS MW-3 AND MW-4
THRIFTY OIL STATION #063, OAKLAND, CA

DATE GAUGED	DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
04/14/97	#N/A	-	-	-	-
07/07/97	NP	18.80	0.00	99.48	80.68
10/16/97	NP	17.76	0.00	99.48	81.72
01/07/98	NP	11.60	0.00	99.48	87.88
04/08/98	NP	10.10	0.00	99.48	89.38
07/14/98	NP	16.30	0.00	99.48	83.18
10/15/98	NP	16.90	0.00	99.48	82.58
01/20/99	NP	15.35	0.00	100.48	85.13
04/16/99	NP	15.30	0.00	100.48	85.18
07/14/99	NP	18.40	0.00	100.48	82.08
10/07/99	NP	16.89	0.00	100.48	83.59
01/26/00	NP	12.62	0.00	100.48	87.86
04/19/00	NP	12.28	0.00	100.48	88.20
05/26/00	NP	13.81	0.00	100.48	86.67
07/26/00	NP	12.29	0.00	100.48	88.19
10/25/00	NP	12.26	0.00	100.48	88.22
01/10/01	NP	10.75	0.00	100.48	89.73
04/23/01	NP	12.26	0.00	100.48	88.22
07/16/01	NP	13.80	0.00	100.48	86.68
10/17/01	NP	16.87	0.00	100.48	83.61
01/23/02	NP	12.28	0.00	100.48	88.20
04/10/02	NP	13.80	0.00	100.48	86.68
07/24/02	NP	15.33	0.00	100.48	85.15
10/30/02	NP	17.00	0.00	100.48	83.48
01/15/03	NP	16.84	0.00	100.48	83.64
04/16/03	NP	16.86	0.00	100.48	83.62
07/14/03	NP	10.69	0.00	100.48	89.79
10/08/03	NP	16.32	0.00	100.48	84.16
01/15/04	NP	14.67	0.00	100.48	85.81

TABLE 2
GROUNDWATER DATA FOR GROUNDWATER EXTRACTION WELLS MW-3 AND MW-4
THRIFTY OIL STATION #063, OAKLAND, CA

DATE GAUGED	DEPTH TO PRODUCT (feet)	DEPTH TO GROUNDWATER (feet)	PRODUCT THICKNESS (feet)	CASING ELEVATION (feet)	GROUNDWATER ELEVATION (feet)
04/14/04	NP	13.68	0.00	100.48	86.80
07/29/04	NP	15.50	0.00	100.48	84.98
10/14/04	NP	16.08	0.00	100.48	84.40
01/06/05	NP	15.24	0.00	100.48	85.24
04/13/05	NP	9.64	0.00	100.48	90.84
07/27/05	NP	16.79	0.00	100.48	83.69
10/12/05	NP	16.78	0.00	100.48	83.70
01/19/06	NP	10.46	0.00	100.48	90.02
04/12/06	NP	12.69	0.00	100.48	87.79
07/26/06	NP	15.18	0.00	100.48	85.30
10/25/06	NP	14.88	0.00	100.48	85.60
01/24/07	NP	13.74	0.00	148.88	135.14
04/24/07	NP	16.67	0.00	148.88	132.21
07/25/07	NP	15.44	0.00	148.88	133.44
10/24/07	NP	15.17	0.00	148.88	133.71
01/23/08	NP	16.57	0.00	148.88	132.31
04/29/08	NP	17.58	0.00	148.88	131.30
07/30/08	NP	16.54	0.00	148.88	132.34
10/29/08	NP	15.14	0.00	148.88	133.74

NOTE:

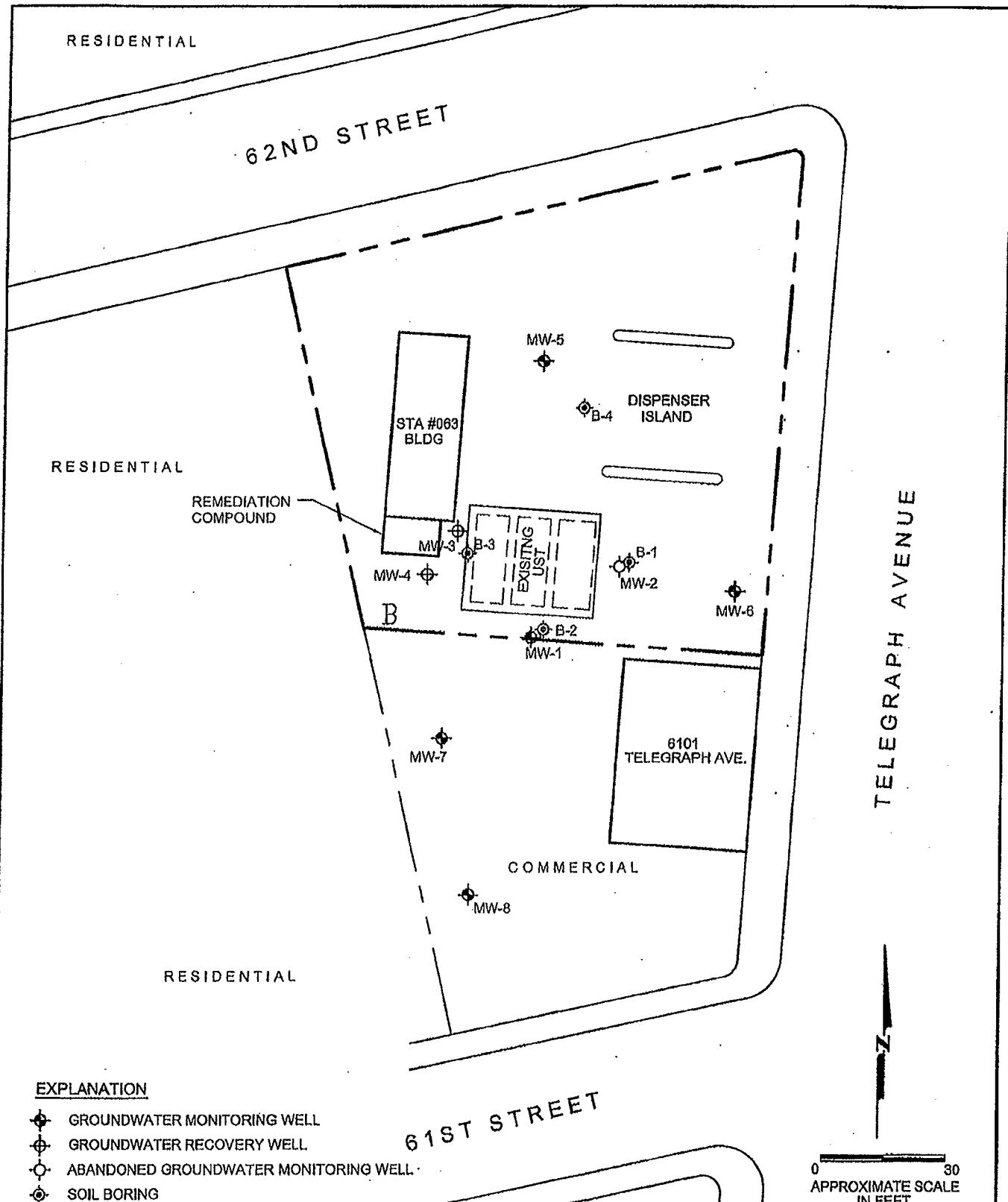
Monitoring wells MW-1 through MW-8 were surveyed on 3/5/2007

[^] Top of casing elevation estimated to be 6 inches below well rim

NP = No free hydrocarbon product

" - " = Not analyzed / Not available

FIGURE



PROJECT NO.		SITE PLAN	FIGURE:
		Thrifty Station No. 063 6125 Telegraph Avenue Oakland, California	1 SHEET: 0 of 0 REVISION NO: 0 DATE: 08/07