Atlantic Richfield Company

Chuck Carmel

Remediation Management Project Manager

PO Box 1257 San Ramon, CA 94583 Phone: (925) 275-3804 Fax: (925) 275-3815 E-Mail: chuck.carmel@bp.com

September 19, 2014

RECEIVED

By Alameda County Environmental Health at 9:08 am, Sep 23, 2014

Re: Site Management Plan

Former Richfield Oil Company Station No. 472 6415 International Boulevard, Oakland, California

ACEH Case #RO0002982

I declare that to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct.

Submitted by,

Chuck Carmel

Remediation Management Project Manager

Attachment



Site Management Plan

Former Richfield Oil Company Station No.472 aka Pluckey's Liquors 6415 International Boulevard Oakland, California ACEH Case No. RO0002982

Prepared for

Mr. Chuck Carmel
Operations Project Manager
Atlantic Richfield Company
P.O. Box 1257
San Ramon, California 94583

Prepared by



4820 Business Center Drive,, Suite 110 Fairfield, California 94534 (707) 455-7290 www.broadbentinc.com

September 19, 2014

Project No. 09-88-601

Creating Solutions. Building Trust.

September 19, 2014

Project No. 09-88-601

Atlantic Richfield Company P.O. Box 1257 San Ramon, CA 94583 Submitted via ENFOS

Attn.: Mr. Chuck Carmel

Re: Site Management Plan, Former Richfield Oil Company Station No.472, 6415 International

Boulevard, Oakland, California; ACEH Case No. RO0002982

Dear Mr. Carmel:

Broadbent & Associates, Inc. (Broadbent) is pleased to submit this *Site Management Plan* for Former Richfield Oil Company Station No.472 (also known as Pluckey's Liquors) located at 6415 International Boulevard, Oakland, California (Site). This document was prepared in order to govern future activities following site closure.

Should you have questions or require additional information, please do not hesitate to contact us at (707) 455-7290.

TIDWELL lo. 969 CERTIFIED

Sincerely,

BROADBENT & ASSOCIATES, INC.

Kristene Tidwell, P.G., C.Hg. Associate Hydrogeologist

Attachment

cc: Ms. Dilan Roe, PE, Alameda County Environmental Health (Submitted via ACEH ftp site)

Mr. Mahmud Ghanem, 6207 International Boulevard, Oakland, CA 94621

Electronic copy uploaded to GeoTracker

SITE MANAGEMENT PLAN

Former Richfield Company Station No. 472 6415 International Boulevard, Oakland, California Fuel Leak Case No. RO0002982

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SITE MANAGEMENT PLAN

Former Richfield Company Station No. 472 6415 International Boulevard, Oakland, California Fuel Leak Case No. RO0002982

1.0 INTRODUCTION

On behalf of the Atlantic Richfield Company— (ARC, a BP affiliated company) Broadbent & Associates, Inc. (Broadbent) has prepared this *Site Management Plan (SMP)* for the Former Richfield Oil Company (ROC) Station No.472 (also known as Pluckey's Liquors but herein referred to as Former Station No.472), located at 6415 International Boulevard, Oakland, California (Site). This SMP was prepared in order to mitigate human exposure to soil and groundwater contamination following recently approved consideration for case closure by the Alameda County Environmental Health Agency. This SMP includes discussions on the Site background and previous environmental activities, present contamination data, and handling procedures for soil and groundwater. A Site Map is included as Drawing 2.

1.1 Site Setting

The Site is currently a vacant store front. Previously, a liquor store was operated onsite, and the building from this operation is still present. The Site is generally asphalt or concrete. Alameda County Assessors records indicate the Site is located on an approximately 0.27 acre parcel of property. The Site is located in Section 16, Township 2 South, Range 3 West, relative to the Mount Diablo Baseline and Meridian of Northern California, and The Site can be located on the Oakland East, California 7½-minute topographic quadrangle map of the United States Geological Survey (USGS). A Site Location Map is presented as Drawing 1.

The Site is located in a mixed residential and commercial land-use area. The property across 64th Avenue to the northwest is a car wash. The property to the southeast is a Little Caesars restaurant. Across International Blvd. To the northeast of the Site is a McDonald's restaurant. To the southwest, and adjacent to the Site, are single-family residences.

1.2 Site Background

The Site operated as a gasoline fueling station between 1947 to at least 1971. The fueling station features including the USTs and dispensers were removed in 1976. A detailed Site history and summary of previous investigations is included in Appendix A.

1.3 Document Purpose and Organization

The purpose of this document is to outline best practices for the possible future handling of materials and outline the risks involved with conducting ground disturbance at the Site. Table 1 presents the historical contamination data obtained from groundwater analysis.

2.0 SOIL MANAGEMENT ACTIVITIES

The following sections present guidelines for parties involved in future ground disturbance activities.

2.1 Soil

No Light Aqueous Phase Liquids (LNAPL) in soil is present at the Site. Additionally, benzene has never been reported in historical soil samples. Shallow soil samples collected at the site within the bioattenuation zone (area of soil between land surface and shallow groundwater located approximately 7 feet bgs) have not detected TPH as gasoline or diesel. Therefore, it was concluded that the vapor intrusion pathway was not complete.

No BTEX has ever been detected in soil or groundwater samples at the Site with the exception of one minor groundwater detection of toluene in 2009. Minimal amounts of GRO and DRO have been detected in groundwater which indicates a minimal soil concentrations as well.

2.2 Groundwater

The most recent sampling results (September 9, 2013) indicates concentration of DRO and GRO consistent with historical ranges. No other analytes were detected in any monitoring well sample. No LNAPL in groundwater is present at the Site. Additionally, benzene has never been reported in historical groundwater samples. Groundwater monitoring laboratory analytical results are summarized in Table 1.

Hydrocarbon concentration trends appear limited in extent, as evidenced by the absence of any petroleum hydrocarbon detections in downgradient well MW-3. Due to the hydrocarbon signature in groundwater consisting of only minor sporadic detections of DRO/GRO and no select BTEX and/or fuel oxygenates (benzene has never been detected), and the age of the release; it appears that the remaining hydrocarbon plume greatly attenuated over time.

2.3 Health and Safety Plan

Prior to conducting any earthwork activities, a Site-Specific health and safety plan (HASP) shall be prepared for use by personnel implementing the work. The HASP will address the scope of work. A copy of the HASP shall be available onsite during the work. Subcontractors performing field activities will be provided with a copy of the HASP prior to initiating work. The HASP will include a comprehensive list of chemicals which may be encountered and the MSDS sheets for these chemicals.

2.4 Handling Procedures for Contaminated Soil

Contaminated or hazardous soil is not anticipated to be based on data collected to date (Table 1, Appendix B). However, in the event that soil is excavated during future site development activities, the soil shall be segregated and profiled if petroleum impacted soil is encountered. Profiling will consist of sampling and tested via field methods to determine if it is considered hazardous waste. If this is the case, soil shall be transported in compliance with all state and federal regulations to a permitted disposal site and disposed of according to standard procedures.

Because groundwater is relatively shallow and the soil impacts are limited in extent and magnitude, we can infer that the contaminant mass in soil above the groundwater table is not appreciable, and the potential for further leaching is limited.

2.5 Handling Procedures for Contaminated Groundwater

With the exception of a low MTBE concentration detected in MW-1 (0.54 micrograms per liter [μ g/L] on 8/25/09) and a low Toluene concentration detected in MW-3 (1.2 μ g/L on 8/25/2009), both believed to be anomalous, BTEX and fuel oxygenates are not present. Primarily GRO and DRO have been detected in groundwater at the site with concentration from the most recent sampling event conducted on September 4, 2013 all below 200 μ g/L.

Due to the sporadic nature of concentration spikes in groundwater at the site, caution shall be taken when performing any work that may put humans into direct contact with groundwater. Proper PPE shall be used at all times. Dewatered fluid shall be held in storage tanks, sampled, transported, and analyzed according to applicable laws; and disposed of according to standard procedures.

2.6 Decontamination

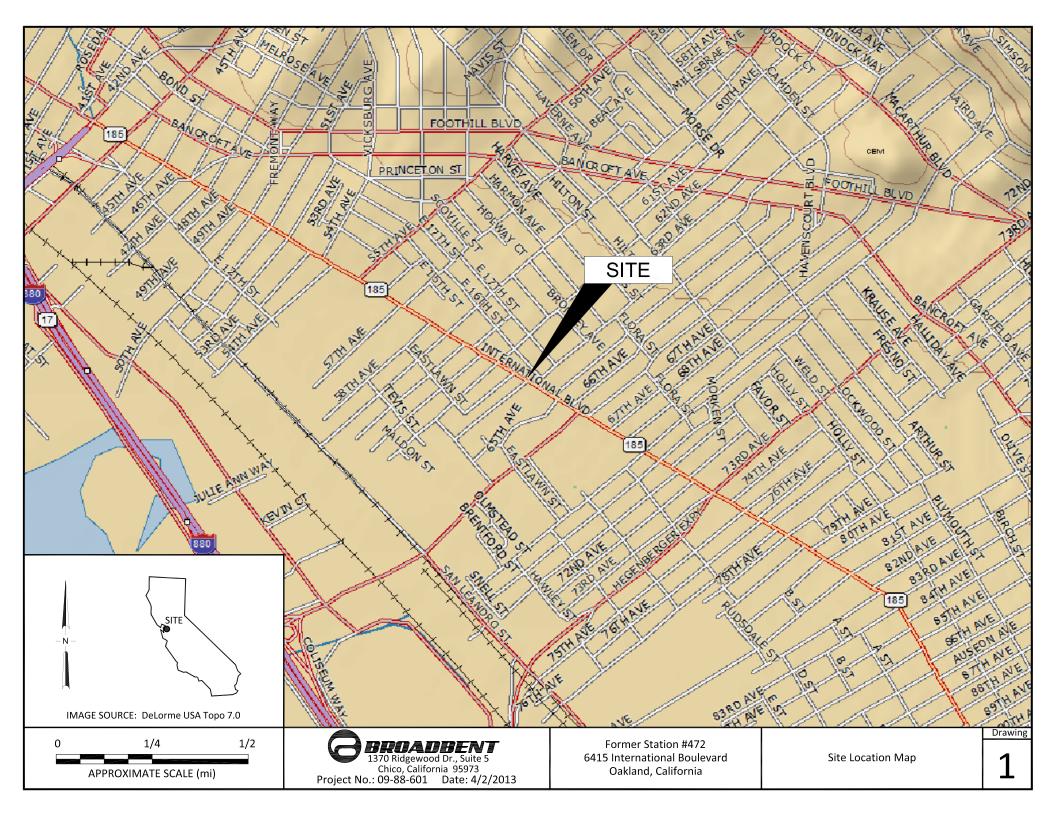
Detergents, such as alconox or bleach, shall be used on equipment that has contacted contaminated or possibly contaminated soils and/or fluids.

2.7 Implementation of Site Management Plan

This Site Management Plan shall be given as a copy to contractors that will be performing ground disturbance work at the site. Contractors are responsible to maintain safety and comply with this and any other plans pertaining to the site.

As conditions change this SMP may require modification to maintain its relevance. Conditions that may require a modification to this plan include: regulations, environmental factors, scope of work that is not addressed by this plan, presence of chemicals not addressed by this plan, etc.





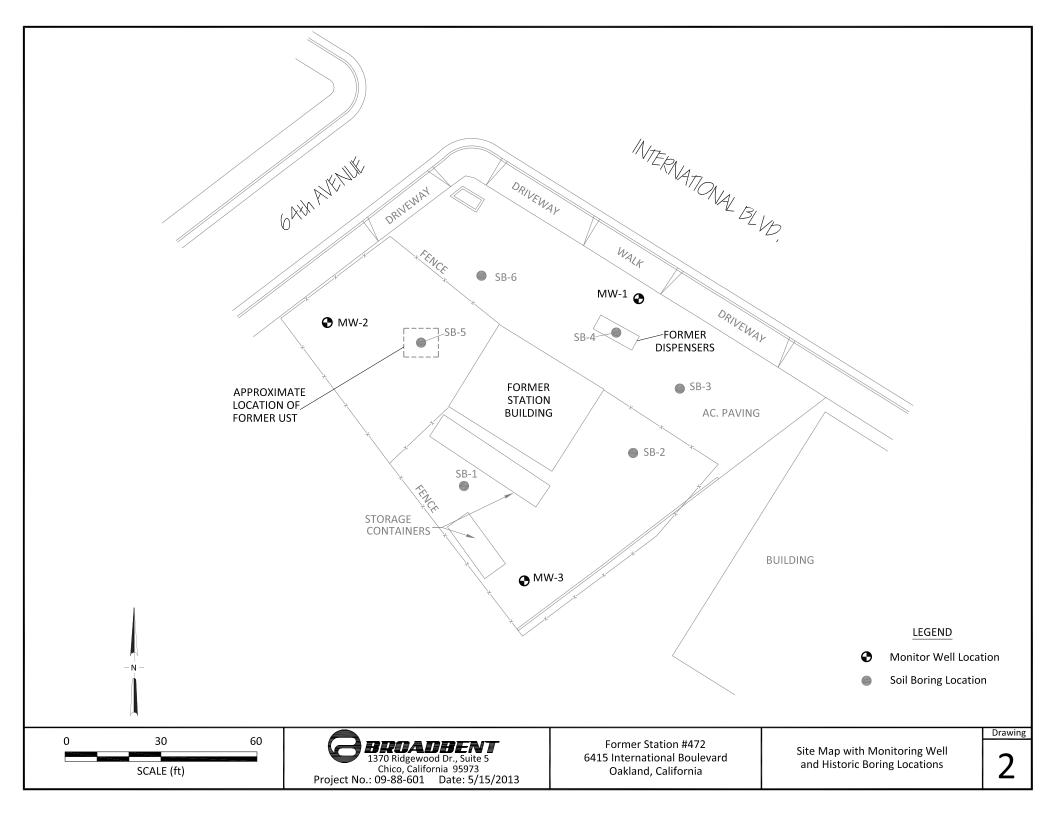


TABLE 1 Analytical Results

Table 1. Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses

ARCO Service Station #472, 6415 International Boulevard, Oakland, CA

			Top of	Bottom of		Water Level	Concentrations in μg/L									
Well ID and		тос	Screen	Screen	DTW	Elevation	DRO/	GRO/			Ethyl-	Total		DO		
Date Monitored	P/NP	(feet)	(ft bgs)	(ft bgs)	(feet)	(feet)	TPHd	TPHg	Benzene	Toluene	Benzene	Xylenes	MTBE	(mg/L)	рН	Footnote
MW-1																
8/25/2009	Р	24.17	7.00	17.00	9.29	14.88	190	530	<0.50	<0.50	<0.50	<0.50	0.54		7.21	LX (DRO)
11/11/2009	NP		7.00	17.00	8.22	15.95		<50	<0.50	<0.50	<0.50	<0.50	<0.50			
2/17/2010	NP		7.00	17.00	7.36	16.81	70	<50	<0.50	<0.50	<0.50	<0.50	<0.50	1.69	7.03	LX (DRO)
6/2/2010	NP		7.00	17.00	7.61	16.56	120	110	<0.50	<0.50	<0.50	<0.50	<0.50	1.21	7.0	LW (GRO), LX (DRO)
9/3/2010	NP		7.00	17.00	8.99	15.18	190	1,000	<0.50	<0.50	<0.50	<0.50	<0.50	0.74	7.30	LW (GRO), LX (DRO)
2/8/2011	NP		7.00	17.00	7.69	16.48	53	<50	<0.50	<0.50	<0.50	<0.50	<0.50	0.64	6.8	LX (DRO)
7/18/2011	NP		7.00	17.00	7.99	16.18	110	<50	<0.50	<0.50	<0.50	<0.50	<0.50	0.70	7.2	LX (DRO)
3/1/2012	Р		7.00	17.00	8.20	15.97	140	500	<0.50	<0.50	<0.50	<0.50	<0.50	0.71	7.01	
8/15/2012	Р		7.00	17.00	8.89	15.28	220	490	<0.50	<0.50	<0.50	<1.0	<0.50	8.90	7.53	
2/21/2013	Р		7.00	17.00	7.63	16.54	<51	<50	<0.50	<0.50	<0.50	<1.0	<0.50	1.78	7.54	
9/4/2013	Р		7.00	17.00	9.40	14.77	130	330	<0.50	<0.50	<0.50	<1.0	<0.50	1.48	7.37	
MW-2																
8/25/2009	Р	23.62	7.00	17.00	9.65	13.97	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50		7.30	
11/11/2009	NP		7.00	17.00	8.09	15.53		<50	<0.50	<0.50	<0.50	<0.50	<0.50			
2/17/2010	Р		7.00	17.00	6.80	16.82	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	2.62	7.15	
6/2/2010	NP		7.00	17.00	7.11	16.51	65	<50	<0.50	<0.50	<0.50	<0.50	<0.50	2.85	7.3	LX (DRO)
9/3/2010	NP		7.00	17.00	8.79	14.83	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	1.19	7.90	
2/8/2011	NP		7.00	17.00	7.21	16.41	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	2.15	7.0	
7/18/2011			7.00	17.00												Inaccessible
3/1/2012	Р		7.00	17.00	7.41	16.21	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	1.89	7.34	
8/15/2012	Р		7.00	17.00	8.79	14.83	<47	<50	<0.50	<0.50	<0.50	<1.0	<0.50	3.3	7.48	
2/21/2013	Р		7.00	17.00	6.89	16.73	<52	<50	<0.50	<0.50	<0.50	<1.0	<0.50	1.35	7.73	
9/4/2013	Р		7.00	17.00	9.35	14.27	<48	<50	<0.50	<0.50	<0.50	<1.0	<0.50	1.21	7.48	
MW-3																
8/25/2009	Р	24.73	7.00	17.00	11.07	13.66	85	63	<0.50	1.2	<0.50	<0.50	<0.50		7.09	
11/11/2009	NP		7.00	17.00	9.56	15.17		88	<0.50	<0.50	<0.50	<0.50	<0.50			LW (GRO)

Table 1. Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses

ARCO Service Station #472, 6415 International Boulevard, Oakland, CA

			Top of	Bottom of		Water Level		Concentrations in µg/L								
Well ID and Date Monitored	P/NP	TOC	Screen	Screen	DTW (foot)	Elevation	DRO/ TPHd	GRO/	Danzana	Toluene	Ethyl-	Total Xylenes	МТВЕ	DO (mg/l)	На	Footnote
Date Monitored	P/NP	(feet)	(ft bgs)	(ft bgs)	(feet)	(feet)	IPHO	TPHg	Benzene	roluene	Benzene	Ayienes	IVIIDE	(mg/L)	рп	rootnote
MW-3 Cont.																
2/17/2010	NP	24.73	7.00	17.00	8.52	16.21	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	2.04	7.09	
6/2/2010	NP		7.00	17.00	8.64	16.09	130	100	<0.50	<0.50	<0.50	<0.50	<0.50	1.22	7.1	LW (GRO), LX (DRO)
9/3/2010	NP		7.00	17.00	8.41	16.32	140	200	<0.50	<0.50	<0.50	<0.50	<0.50	0.87	6.9	LW (GRO), LX (DRO)
2/8/2011	NP		7.00	17.00	8.82	15.91	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	0.88	7.0	
7/18/2011	NP		7.00	17.00	9.20	15.53	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	0.93	6.9	
3/1/2012	Р		7.00	17.00	9.13	15.60	<50	<50	<0.50	<0.50	<0.50	<0.50	<0.50	0.63	6.91	
8/15/2012	Р		7.00	17.00	10.45	14.28	600	<50	<0.50	<0.50	<0.50	<1.0	<0.50	2.99	7.38	*(DRO)
2/21/2013	Р		7.00	17.00	8.39	16.34	95	<50	<0.50	<0.50	<0.50	<1.0	<0.50	1.30	7.76	
9/4/2013	Р		7.00	17.00	10.92	13.81	<48	<50	<0.50	<0.50	<0.50	<1.0	<0.50	0.97	8.01	

Table 1. Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses

ARCO Service Station #472, 6415 International Boulevard, Oakland, CA

			Top of	Bottom of		Water Level			Con	centrations in με	/L					
Well ID and		TOC	Screen	Screen	DTW	Elevation	DRO/	GRO/		Eth	yl- To	otal		DO		I
Date Monitored	P/NP	(feet)	(ft bgs)	(ft bgs)	(feet)	(feet)	TPHd	TPHg	Benzene	Toluene Ben	ene Xyle	enes	MTBE	(mg/L)	рН	Footnote

Symbols & Abbreviations:

--- = Not analyzed/applicable/measured/available

< = Not detected at or above specified laboratory reporting limit

DO = Dissolved oxygen

DRO = Diesel range organics

DTW = Depth to water in ft bgs

GRO = Gasoline range organics

GWE = Groundwater elevation measured in ft

HVOC = Halogenated volatile organic compounds

mg/L = Milligrams per liter

MTBE = Methyl tert-butyl ether

NP = Well not purged prior to sampling

P = Well purged prior to sampling

TOC = Top of casing measured in ft

TOG = Total oil and grease

TPH-d = Total petroleum hydrocarbons as diesel

TPH-g = Total petroleum hydrocarbons as gasoline

μg/L = Micrograms per liter

CEL = CalScience Environmental Laboratories, Inc.

* = Hydrocarbon result partly due to individual peak(s) in the quantitation range

Footnotes:

LW = Quantitation of unknown hydrocarbon(s) in sample based on gasoline

LX = Quantitation of unknown hydrocarbon(s) in sample based on diesel

APPENDIX A SUMMARY OF PREVIOUS INVESTIGATIONS

Summary of Previous Investigations

In 1947, Richfield Oil Company purchased the property for the construction of a service station with completion taking place in 1949. The service station was operated by various Richfield Oil Company dealers from 1949 to 1970. In 1966, two 4,000 gallon and one 6,000 gallon replacement underground storage tanks (USTs) were installed on the property. Richfield Oil Company sold the property in 1971 to the Nattrass Corporation.

In May 2007, AAI Environmental Corporation (AAI) conducted a Phase I Environmental Site Assessment (ESA) on the property. Work included review of environmental and regulatory databases and site reconnaissance prior to selling the property. AAI reported that one or two USTs were previously removed from the northeast corner of the property prior to 1976, but no soil sampling data or removal report were found to confirm the information given. Sampling and reporting information was likely not required at that time. The AAI site reconnaissance reportedly did not identify potential concerns. However, AAI recommended a limited Phase II Environmental Site Assessment on the property to assess the former presence of the USTs and/or legacy environmental contamination (AAI, 2007).

In April 2008, GEOCON conducted a Limited Phase II Environmental Site investigation on the Site. Work included the advancement of six soil borings (SB-1 through SB-6) down to 31 feet below ground surface (ft bgs) at the locations shown on Drawing 2. Soil samples were collected from each boring and ground-water samples were collected from borings SB-1, SB-2, SB-3 and SB-5. Soil boring SB-1 was drilled on the backside of the property to assess the potential for off-site contaminant migration. Borings SB-2, SB-3, SB-5 and SB-6 were advanced in the area suspected of containing the former USTs. SB-4 was advanced to assess a former pump island. Soil samples from borings SB-1 through SB-6 contained Total Petroleum Hydrocarbons in the Gasoline Range (TPHg) at concentrations up to 95 milligrams per kilogram (mg/kg) (SB-6 at 14 ft bgs), Total Petroleum Hydrocarbons in the Diesel Range (TPHd) at concentrations up to 20 mg/kg (SB-2 at 20 ft bgs), and Total Petroleum Hydrocarbons in the Motor Oil Range (TPHmo) at concentrations up to 51 mg/kg (SB-2 at 20 ft bgs). Grab groundwater samples from borings SB-1, SB-2, SB-3 and SB-5 contained TPHg at concentrations up to 8.1 milligrams per liter (mg/L) (SB-3), TPHd at concentrations up to 7.2 mg/L (SB-3), and TPHmo at concentrations up to 0.18 mg/L (SB-5). No concentrations of Benzene, Toluene, Ethylbenzene, or Xylenes (BTEX) were detected above the laboratory reporting limits in the soil or groundwater samples collected (GEOCON, 2008).

In a letter dated January 29, 2009, ACEH requested completion of an Unauthorized Release Report (URR), and soil and groundwater investigation work plan. A URR was submitted to ACEH on February 20, 2009. A work plan for a soil and groundwater investigation was submitted to ACEH on March 30, 2009. In a letter dated April 16, 2009, ACEH requested an addendum work plan. An addendum work plan for a soil and groundwater investigation was submitted to ACEH on May 28, 2009. In a letter dated June 11, 2009, ACEH approved the addendum work plan. Broadbent and Associates, inc. (Broadbent) submitted the *Revised Soil & Ground-Water Investigation with Third Quarter 2009 Ground-Water Monitoring Report* detailing the installation of three groundwater monitoring wells on November 17, 2009. No petroleum hydrocarbons were detected in the 20 soil samples collected during monitoring well installation activities with the exception of one sample containing Gasoline Range Organics (GRO), which was detected at a concentration of 0.87 mg/kg in boring MW-1 at 14.5 ft bgs.

Broadbent conducted quarterly groundwater monitoring and sampling from the Third Quarter of 2009 to the Second Quarter of 2010. With the concurrence of ACEH, Broadbent switched to semi-annual

monitoring and sampling in the First Quarter of 2011. Low concentrations of Diesel Range Organics (DRO) and GRO have been generally stable or decreasing in wells since initial sampling. The highest GRO concentration was found in well MW-1 at 1,000 micrograms per liter (μ g/L, parts per billion, ppb) during the Third Quarter 2010 sampling event. The highest DRO concentration was found in well MW-1 during the First Quarter 2013 sampling event at 95 μ g/L. BTEX and MTBE have not been detected in any of the groundwater samples with the exception of a concentration of 1.2 μ g/L of Toluene in well MW-3 (third quarter 2009) and 0.54 μ g/L of MTBE in well MW-1 (Third Quarter 2009).

References

- AAI, May 9, 2007. Phase I Environmental Site Assessment Report, Former Gasoline Station Pluckey's Liquors, 6415 International Boulevard, Oakland, California. Prepared for Mr. Marcelo Bermudez, Freeman.
- Broadbent & Associates, Inc., February 20, 2009. *Underground Storage Tank Unauthorized Release* (Leak)/ Contamination Site Report, Atlantic Richfield Company Station No. 472, 6415 International Boulevard, Oakland, CA, ACEH Case No. R00002982.
- Broadbent & Associates, Inc., November 17, 2009. Revised Soil & Ground-Water Investigation and Third Quarter 2009 Ground-Water Monitoring Report, For Former Atlantic Richfield Company Station No. 472, 6415 International Boulevard, Oakland, CA, ACEH Case No. RO0002982.
- Broadbent & Associates, Inc., November 28, 2011. Case Evaluation and Justification for No Further Action, Former Atlantic Richfield Company Station No. 472, 6415 International Boulevard, Oakland, CA, ACEH Case No. R00002982.
- Broadbent & Associates, Inc., April 26, 2013. First Quarter 2013 Monitoring Report, Former Richfield Oil Company Station #472, 6415 International Boulevard, Oakland; ACEH Case #R00002982.
- GEOCON, May 7, 2008. Limited Soil and Grab Groundwater Sampling Report, Plucky's Liquors/Former Gasoline Station, 6415 International Boulevard, Oakland, California. Prepared for Ms. Holly Moore, DGC Associates.

APPENDIX B HISTORICAL SITE DATA

Table 1
Summary of Soll Sample Results
Plucky's Liquors / Former Gasoline Station
6415 International Blvd.
Oakland, California

Borchole	Collection	Depth	TPHg	TPHd	TPHmo	Benzene	Toluene	Ethylbenzene (ing/kg)	Total Xylenes
Location	Date	(feet bgs)	(mg/kg)	(mg/kg)	(mg/kg)	(ug/kg)	(ug/kg)		(யூ/kg)
SB-1	4/22/2008	15	7.3	6.3	5.5	<5.0	<5.0	<5.0	<15
SB-2	4/22/2008	16	21	2.6	3.5	<5.0	<5.0	<5.0	<15
SB-2	4/22/2008	20	<1.0	20	51	<5.0	<5.0	<5.0	<15
SB-3	4/22/2008	13	<1.0	5.8	5.8	<5.0	<5.0	<5.0	<15
SB-3	4/22/2008	20	<1.0	<1.0	1.6	<5.0	<5.0	<5.0	<15
SB-4	4/22/2008	8	<1.0	4.6	6.2	<5.0	<5.0	<5.0	<15
SB-5	4/22/2008	16	<1.0	7.6	6.3	<5.0	<5.0	<5.0	<15
SB-6	4/22/2008	14	95 <1.0 <1.0	7.8	4.4	<2.5	<25	<25	<75
SB-6	4/22/2008	20		1.5	4.0	<5.0	<5.0	<5.0	<15
SB-6	4/22/2008	31		3.2	2.7	<5.0	<5.0	<5.0	<15

Table 2
Summary of Grab Groundwater Sample Results
Plucky's Liquors / Former Gasoline Station
6415 International Bivd.
Oakland, California

Borchole Location	Collection Date	Depth (feet bgs)	TPLig (mg/l)	TPHd (mg/l)	TPHmo (mg/l)	Benzene (ug/l)	Toluene (ug/l)	Ethylbenzene (ug/l)	Total Xylenes
SB-1	4/22/2008	21	0.080	0.076	0.11	<0.50	<0.50	<0.50	<1.5
SB-2	4/22/2008	21	1.5	0.71	0.13	<0.50	<0.50	<0.50	<1.5
SB-3	4/22/2008	26	8.1	7.2	0.15	<5.0	<5.0	<5.0	
SB-5	4/22/2008	14	0.14	0.11	0.18	<0.50	<0.50	<0.50	<1.5

NOTES:

TPHg- Total Petroleum Hydrocarbons as Gasoline

TPHd - Total Petroleum Hydrocarbons as Diesel

TPHmo - Total Petroleum Hydrocarbons as Motor Oil

mg/kg- Milligrams per kilogram

ug/kg- Micrograms per kilogram

mg/l - Milligrams per liter

ug/I - Micrograms per liter

Table 1. Summary of Soil Sampling Analytical Data Station #472, 6415 International Boulevard, Oakland, CA

			DRO/	ORO/	GRO/			Ethyl-	Total
	Sample	Date	TPHd	TPHo	TPHg	Benzene	Toluene	benzene	Xylenes
Sample ID	Depth (ft)	Sampled			Cond	centrations in (m	g/kg)		
MW-1 6.5'	6.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-1 8'	8.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-1 9.5'	9.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-1 11'	11.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-1 12.5'	12.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-1 14.5'	14.5	7/14/2009	ND <5.0	ND <25	0.87	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 6.5'	6.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 8'	8.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 9.5'	9.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 11'	11.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 12.5'	12.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 14.5'	14.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-2 17'	17.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 6.5'	6.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 8'	0.8	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 9.5'	9.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 11'	11.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 12.5'	12.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 14.5'	14.5	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010
MW-3 17'	17.0	7/14/2009	ND <5.0	ND <25	ND <0.50	ND <0.0010	ND <0.0010	ND <0.0010	ND <0.0010

ND = Not Detected above the laboratory detection limit

DRO/TPHd = Diesel Range Organics/Total Petroleum Hydrocarbons in the diesel range (C10-C28)

ORO/TPHo = Oil Range Organics/Total Petroleum Hydrocarbons in the oil range (C17-C44)

GRO/TPHg = Gasoline Range Organics/Total Petroleum Hydrocarbons in the gasoline range (C6-C12)

mg/kg = milligrams per killogram

PROJEC	1	E8448-	1	BORING NO. SB-1	SGL.	
ĒZI	PENETRAT RESIST BLOWSFT	SAMPLE	TTHOLOGY	DATE DRILLED 4/22/08 WATER LEVEL (ATD)	(USCS)	HEADSPACE (FPM)
	a. a					
				SOIL DESCRIPTION	The second secon	44444439798659997
_] ~			1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	ASPHALT AND BASE ROCK	in Colonia de la	
- 2 - - 3 -				Stiff, moist, black, fine Sandy CLAY, low to medium plasticity, no odor	CL	
- 4 - - 5 -	Andrews and the second	e da approprieto de la compositio della compositio della		•	Like Like Andrews	
- 6						
- 7 -		and the second s	172	Stiff, moist, olive, medium Sandy CLAY, low plasticity, no	CL	
- 8 - - 9 -	All Challed and All Challed An	KANALANDONONNY PROPRANTANA		odor Dense, moist to very moist, olive, Clayey coarse angular	GC	
- 10 ···	The state of the s	AND THE REAL PROPERTY OF THE P				000 m m m m m m m m m m m m m m m m m m
12	Rosevigither of the second sec	(Approximate Province of the Approximate of the App		Stiff, moist, yellowish red with light green, Sandy CLAY, low to medium plasticity, no odor	CL.	DESCRIPTIONS AND
- 14 -				Dense, moist, pale green, Clayey GRAVEL, with coarse	GC	
- - 15 -				angular sand, slight plasticity, slight odor Firm to soft, moist, brown, Silty CLAY, low to medium		
- 16 -				plasticity, no odor	A Company of the Comp	***************************************
- 17 -						
- 18 -		SAAA				i i i i i i i i i i i i i i i i i i i
- 19 -						фотограничения
- 20 -	-			- Anna Anna Anna Anna Anna Anna Anna Ann		
- 21 -		Social Value		Soft, very moist, brown, Silty CLAY, with interbedded clayey fine sand, low to medium plasticity, no odor	CL	Sandalastenen etter ette

Figure 1, Log of Boring SB-1, page 1 of 1

ENV_NO_WELL PLUCKYS BORINGS.GPJ 05/06/08

PODING PLEVATION:	ENGINEER/GEOLOGIST:	JOHN LOVE
BORING ELEVATION:		

BORING TERMINATED AT 24 FEET

PROJECT NO.	E8448-06-01		10 to 1 to 1	
DEPTH IN PEET PENETRAT. RESIST. BLOWS/PT.	SAMPLE NO. LITHOLOGY	BORING NO. SB-2 DATE DRILLED 4/22/08 WATER LEVEL (ATD) FOUIPMENT GEOPROBE DRILLER En Proh	SOIL (USCS)	HEADSPACE (PPM)
		SOIL DESCRIPTION	and the second s	
- 1 - 2 - 2	7.7.	ASPHALT Stiff, moist, black, fine Sandy CLAY, low to medium plasticity, no odor	CL	
- 3 - - 4 - - 5 - - 6 -				Negio — marsa se a
7 -		Stiff, moist, olive, medium Sandy CLAY, low plasticity, no	CL	Management of the second
- 8 -		Odor Dense, moist to very moist, olive, Clayey coarse angular	GC	The second secon
- 9 - - 10 - - 11 -		▼ GRAVEL, no odor	CANAGE CONTROL OF THE PARTY OF	
- 12 - - 13 -		Stiff, moist, yellowish red with light green, Sandy CLAY, low to medium plasticity, no odor	CL	oose-i-lisadiirii Kadanida Kalinda Kalinda
- 14 -	578	Dense, moist, pale green, Clayey GRAVEL with coarse	GC	Populari de construir de constr
- 15 - - 16 -		Dense, moist, pale green, Clayey GRAVEL with coarse angular sand, slight plasticity, petroleum odor Firm to soft, moist, brown, Silty CLAY, low to medium plasticity, petroleum odor	CL	* The second sec
- 17 - - 18 -				Company of the second s
- 19 - - 20 -			4	
um 21 mm		Soft, very moist, brown, Silty CLAY with interbedded clayey fine sand, petroleum odor	CL	
- 23 -			-	*** Alexandra Colorador
24 -		BORING TERMINATED AT 24 FEET		

Figure 2, Log of Boring SB-2, page 1 of 1

ENV_NO_WELL PLUCKYS BORINGS GPJ 05/06/08

0	-	_	-				
BORIN	G ELI	EVAT	ION:		ENGINEER/GEOLOGIST:	JOHN LOVE	

4-12-12-12-12-12-12-12-12-12-12-12-12-12-	CI NO.	E0440-	00 01		4	
# L	T. FT.	3	YDC	BORING NO. SB-3	401	
DEPTH NI FEET	PENETRAT RESIST. BLOWS/FT	SAMPLE NO.	LITHOLOGY	DATE DRILLED 4/22/08 WATER LEVEL (ATD)	SOIL	HEALISPACI
L	E B B B B	'S	EES	EQUIPMENT GEOPROBE DRILLER En Prob	(USCS)	(PPM)
Walland and the same of the sa				SOIL DESCRIPTION		
\$442 WEST	A CONTRACTOR OF THE PROPERTY O	And the second s		ASPHALT		
3 - 4 - 5				Stiff, moist, black to brown, Sandy CLAY, low plasticity, no odor	CL	meneral descriptions of the second se
- 6 - - 7 -		метре внеемности по поставления по поставления поставления поставления поставления поставления поставления пост		Dense, moist, brown, Clayey GRAVEL with angular sand and gravel, no odor	GC	
8 9		CT SAME AND ASSESSMENT OF THE SAME ASSESSMENT		Firm, moist, reddish yellow, Sandy CLAY, low to medium	CL	
10 - - 11 -	Transcription to the state of t			Stiff, moist, pale green, Sandy CLAY, medium plasticity, no	CL	And the second control of the second control
13	Social designation of the second seco	THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PR		Moist, Gravelly SAND with some clay and interbedded brick fragments, petroleum odor	SW	ARMORPHICAL CONTRACTOR
- 15 - - 16 -	6000004/Aiddelinid uurusaavastatas Lastin	American de la companya de la compan		Stiff, moist, brown, Silty CLAY, medium plasticity, no odor	CL	artic customent united statement and an article and an article and article article and article and article article and article article article and article article article article and article
- 17 - - 18 -	ALALA CITATA DA MARTINA DE CARROLA DE CARROL	and the second s		othi, moist, stown, stay object, modulity, no odor	447 844	WER (WAS CORPORATE AND
19	en majorani de principa de pri	The second secon				odkadefilmatjackoogene
20	00/900/(imagesparana)	P. C.		over the state of		in the state of th
- 21 - - 22 -	de de la companya de	Personal				BLOOM CONTRACTOR CONTR
23	A CONTRACTOR OF THE CONTRACTOR			To the state of th		
24	мерене в применения	Vicerativa projectivi compressor				

Figure 3, Log of Boring SB-3, page 1 of 2

ENV_NO_WELL PLUCKYS BORINGS GFJ 05/06/08

1			8 #*		
	BORING ELEVATION:	ALADAMA		ENGINEER/GEOLOGIST:	JOHN LOVE

PROJEC	CT NO.	E8448-	06-01	400000000000000000000000000000000000000		**************************************			7	
ingui.	PENETRAT RESIST BLOWSIFT		LITEOLOGY	BORING N					SOIL.	
		S S	<u> </u>	DATE DRILLED _					(USCS)	HEADSPACE (PPM)
Scord.		5%	and the	EQUIPMENT	GEOPROI	BE	_ DRILLER _	<u>En Prob</u>		_
					SOIL D	ESCRIPTION OF THE PERSON OF TH	NC			p
26 - 27 - 28 -				Strong petroles BC		indwater				
	aliania de la companya de la company		Washington of the Control of the Con							Moderate
									- Personal designation of the control of the contro	

Figure 4, Log of Boring SB-3, page 2 of 2

ENV_NO_WELL PLUCKYS BORINGS.GPI 05/06/08

1	PORING ELEVATION:	٦	ENGINEER/GEOLOGIST: JOHN LOVE	
I	BORING ELEVATION:	J	Li tui tibito occidente	

PROTECTAIO	E0440 04 01
PROJECT NO.	E8448-06-01

PROJECT NO.	E8448-06-		٦	
DEPTH IN FEET PENETRAT. RESIST. BLOWS/FT.	SAMPLE NO.	BORING NO. SB-4 DATE DRILLED 4/22/08 WATER LEVEL (ATD) EQUIPMENT GEOPROBE DRILLER En Prob	SOIL (USCS)	FIEADSPACI (PPM)
		SOIL DESCRIPTION		
1 ,000		ASPHALT AND BASE	And the control of th	3.0
- 2 - - 3 - - 4	The control of the co	Stiff, moist, black, Sandy CLAY, medium plasticity, no odor	CL	manamata da
- 5 - - 6 - - 7 -	9	Dense, slightly moist, fine Gravelly SAND, variegated, no odor	SW	
- 8	and the second	BORING TERMINATED AT 8 FEET		
	The control of the co		NOTO DESCRIPTION OF THE PROPERTY OF THE PROPER	OCONOMINATION AND AND AND AND AND AND AND AND AND AN
The second secon	The state of the s		Science and a second se	
	A CONTRACTOR OF THE CONTRACTOR			
				Million Opposite the contraction of the contraction
	The control of the co		Control of the contro	NOTIFICATION OF THE PROPERTY O
	Notice to Account the Control of the		in the state of th	

Figure 4, Log of Boring SB-4, page 1 of 1

ENV_NO_WELL PLUCKYS BORINGS.GPJ 05/06/08

Figure 5, Log of Boring SB-5, page 1 of 1

ENV_NO_WELL PLUCKYS BORINGS.GPJ 05/06/08

BORING ELEVATION:	ENGINEER/GEOLOGIST: JOHN LOVE

E8448-06-01 PROJECT NO. BORING NO. SB-6 PENETRAT. RESIST. BLOWS/FT. LITHOLOGY SAMPLE SOIL 8 MEADSPACE DATE DRILLED 4/22/08 WATER LEVEL (ATD) (PPM) (USCS) En Prob GEOPROBE DRILLER_ EQUIPMENT SOIL DESCRIPTION ASPHALT AND BASE ı 2 Very stiff, moist, black, Sandy CLAY, low to medium CL plasticity, no odor 3 4 5 Dense, moist, brown, Clayey GRAVEL with angular sand, low GC plasticity, no odor 6 7 SW Dense, moist, brown, angular Gravelly SAND, no odor 000 8 Stiff, moist, brown with olive, Sandy CLAY, medium CL plasticity, no odor 10 11 12 13 Soft 14 Slight petroleum odor 15 Pale green 16 CL Stiff to very stiff, moist, brown, Silty CLAY, medium plasticity, no odor 17 18 19 20 21 22 23

Figure 6, Log of Boring SB-6, page 1 of 2

24

ENV_NO_WELL PLUCKYS BORINGS.GPJ 05/06/08

BORING ELEVATION: ENGINEER/GEOLOGIST: JOHN LOVE

SOIL DESCRIPTION - 26 -	0 4	B.P.S.	S.A.	Ē	EQUIPMENT	GEOPROBE	DRILLER	En Prob	(L/SCS)	(JISIM)
- 27						SOIL DESCRIF	MOIT		Total Control	
	26 27 28 29 30			17		SOIL DESCRÌF	PTION	To Probe the second sec		
	A COLONO DE LA COLON DEL LA COLON DE LA CO	omicino de la composito de la	na espalakontonistiniskaskon gyejejejejej					Majalahayayanini	TO COLUMN TO THE PARTY OF THE P	Perceptuani samana s

Figure 7, Log of Boring SB-6, page 2 of 2

ENV_NO_WELL PLUCKYS BORINGS GPI 05/06/08

	2		
BORING ELEVATION:		ENGINEER/GEOLOGIST:	JOHN LOVE
BOILING DEBTATION.	L	0,10111001001001100111	<u> </u>

SOIL BORING LOG

Boring No. MW-1

Sheet: 1 of 1

Client	Former ARCO 472	Date	July 14, 2009
Address	6415 International Boulevard	Drilling Co.	RSI Drilling rig type: Geoprobe 6620 DT
	Oakland, CA	Driller	Norman
Project No.	E472	Method	Hollow Stem Auger Hole Diameter: 10 inches
Logged By:	Collin Fischer	Sampler:	Continuous core
Well Pack	sand: 5 ft. to 17 ft	Well Construction	Casing Material: Schedule 40 PVC Screen Interval: 7 ft. to 17 ft.
	bent.: 3 ft. to 5 ft.	-	Casing Diameter: 4 in. Screen Slot Size: 0.010-in.
	grout: 0 ft. to 3 ft.	Depth to GW:	Virst encountered static

	Sample	Blow	Sa	mple	Well	Depth			<u> </u>
Type	No.	Count	Time	Recov.	Well Details	Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM
						1 2 3			
						4 5 6	SC	Clayey sand with silt and gravel, SC, (0'-7.5'), grayish brown, moist 40% medium grained sand, 25% clay, 20% silt, 15% medium gravel	
S	MW-1 6.5'	N/A	1055	100					0
S	MW-1 8'	N/A	1058	100		8 9			0
S	MW-1 9.5'	N/A	1100	100		10	ML	Clayey silt with sand and gravel, ML, (7.5'-12'), dark yellowish brown moist, low plasticity, 50% silt, 30% clay, 10% fine grained sand 10% medium gravel	0
s	MW-1 11'	N/A	1102	100		11 12			0
s	MW-1 12.5'	N/A	1105	100		13		Clayey sand, SC, (12'-12.5'), grayish brown, moist 60% medium grained sand, 40% clay Clayey silt, ML, (12.5'-13.5'), dark yellowish brown, moist, medium plasticity	0
s	MW-1 14.5'	N/A	1107	100		14	sc	60% silt, 40% clay Clayey sand, SC, (13.5'-14.5'), dark grayish brown, moist 60% medium grained sand, 40% clay	21
						16 17	ML	Clayey silt, ML, (14.5'-17'), grayish brown, moist, medium plasticity 60% silt, 40% clay	
		**********				18 19	Ī		
								Comments:	

STRATUS ENVIRONMENTAL, INC.

ARCO 472 MW-1 Bonning

Boring No. MW-2

Sheet: 1 of 1

Client	Former ARCO 472	Date	July 14, 2009		
Address	6415 International Boulevard	Drilling Co.	RSI Drilling rig type: Geoprobe 6620 DT		
	Oakland, CA	Driller	Norman		
Project No.	E472	Method	Hollow Stem Auger Hole Diameter: 10 inches		
Logged By:	Collin Fischer	Sampler:	Continuous core		
Well Pack	sand: 5 ft. to 17 ft	Well Construction	Casing Material: Schedule 40 PVC Screen Interval: 7 ft. to 17 ft.		
	bent.; 3 ft. to 5 ft.		Casing Diameter: 4 in. Screen Slot Size: 0.010-in.		
	grout: 0 ft. to 3 ft.	Depth to GW:	√ first encountered static ▼		

	Sample	Blow	Sa	mple	Well	Depth	Lithologic		PID
Туре	No.	Count	Time	Recov.	Details	Scale	Column	Descriptions of Materials and Conditions	(PPM
						1			
				İ	-	l — .			
						2			
				ļ		_3			
			·}	 		-	sc	Clayey sand with silt and gravel, SC, (0'-8'), grayish brown, moist	
						5		40% medium grained sand, 25% clay, 20% silt, 15% medium gravel	
	MW-2 6.5'	N/A	1600	100	-111 111	6			
3	10100-2 0.5	INZ	1000	100		7			"
				*********	11111111				
S	MW-2 8'	N/A	1602	100	.!: ≣ :::	8			0
					III≣III		N. 83	Clayey silt, ML, (8'-9.5'), dark yellowish brown, moist, medium plasticity	
s	MW-2 9.5'	N/A	1605	100		9	ML	60% silt, 40% clay	
٠.	10100-2 3.5	14/13	1000	100		10			
					131		SC	Clayey sand with silt and gravel, SC, (9.5'-11.5'), dark brown, wet	
S	MW-2 11'	N/A	1607	100	.!i ≣ iii	11		40% medium grained sand, 25% clay, 20% silt, 15% medium gravel	0
							ML	Clayey silt, ML, (11.5'-12.5'), yellowish brown, moist, medium plasticity 60% silt, 40% clay	
S	MW-2 12.5'	N/A	1610	100	{:: ≣ ::	12	IVIL	Clayey sand with silt and gravel, SC, (12.5'-13'), dark brown, moist	
0	12.0	14/1	10.0	100		13	SC	40% medium grained sand, 25% clay, 20% silt, 15% medium gravel	"
					1:: ≣ ::			Clayey silt, ML, (13'-14'), dark yellowish brown, moist, medium plasticity	
					≣	14		60% silt, 40% clay	
S	MW-2 14.5'	N/A	1612	100			SC	Clayey sand with silt and gravel, SC, (14'-14.5'), yellowish brown, moist	0
				********	ti E	15		40% medium grained sand, 25% clay, 20% silt, 15% medium gravel Clayey silt, ML, (14.5'-17'), dark yellowish brown, moist, medium plasticity	
					≣	16	ML.	60% silt, 40% clay	
S	MW-2 17'	N/A	1615	100		17			0
						_			
					† 1	18			
]	19			
]				1
					<u> </u>	20			<u></u>
								Comments:	

Comments:

STRATUS ENVIRONMENTAL, INC.

ARCO 472 MW-2 Boring Log-kie

Client	Former ARCO 472	Date	July 14, 2009
Address	6415 International Boulevard	Drilling Co.	RSI Drilling rig type: Geoprobe 6620 DT
	Oakland, CA	Driller	Norman
Project No.	E472	Method	Hollow Stem Auger Hole Diameter: 10 inches
Logged By:	Collin Fischer	Sampler:	Continuous core
Well Pack	sand: 5 ft. to 17 ft	Well Construction	Casing Material: Schedule 40 PVC Screen Interval: 7 ft. to 17 ft.
	bent.: 3 ft. to 5 ft.	*****	Casing Diameter: 4 in. Screen Slot Size: 0.010-in.
	grout: 0 ft. to 3 ft.	Depth to GW:	V first encountered static

	Sample T	Blow	Sa	mple	Well	Depth	Lithologic		PID
Type	No.	Count	Time	Recov.	Details	Scale	Column	Descriptions of Materials and Conditions	(PPM
						1 2 3			
						4 5 	CL	Silty clay with sand, CL, (0'-8'), dark brown, moist, medium plasticity 50% clay, 40% silt, 10% fine grained sand	
S	MW-3 6.5'	N/A	1405	100	_	6 7			0
S	MW-3 8'	N/A	1407	100		8		Silty clay with sand and gravel, CL, (8'-9'), dark yellowish brown, moist	0
S	MW-3 9.5'	N/A	1410	100		9 10	SC	low plasticity, 40% silt, 30% clay, 20% fine gravel, 10% fine grained sand Clayey sand with silt and gravel, SC, (9'-10'), dark grayish brown, moist 40% medium grained sand, 25% clay, 20% silt, 15% medium gravel	0
S	MW-3 11'	N/A	1412	100		11			0
s 	MW-3 12.5'	N/A	1415	100		12 13		Clayey silt, ML, (10'-15'), dark yellowish brown, moist, medium plasticity 60% silt, 40% clay	0
s	MW-3 14.5'	N/A	1417	100		14 15		·	0
						16	SC [Clayey sand with silt and gravel, SC, (15'-16.5'), dark grayish brown, wet 40% medium grained sand, 25% clay, 20% silt, 15% medium gravel Clayey silt, ML, (16.5'-17'), dark yellowish brown, moist, medium plasticity	
s	MW-3 17'	N/A	1420	100		17 — 18		60% silt, 40% clay	0
						19			
					<u> </u>	20			<u> </u>
							ľ	Comments:	

ARCO 472 MW-3 Bonnig L