

5500 Shellmound Street, Emeryville, CA 94608-2411 A Z M A 510-547-5043 Phone: **510-450-6000**

94 MAY -5 PM 4: 18

April 27, 1994

Barney Chan Alameda County Department of Environmental Health 80 Swan Way, Room 200 Oakland, CA 94621

3137

Re: Shell Service Station WIC #204-5508-5801 630 High Street Oakland, California ACDEH STID #3737 WA Job #81-602-104

Dear Mr. Chan:

This letter describes recently completed and anticipated activities at the Shell service station referenced above (Figure 1). This status report satisfies the quarterly reporting requirements prescribed by California Administrative code title 23 Waters, Chapter 3, Subchapter 16, Article 5, Section 265.d. Included below are descriptions and results of activities performed in the first quarter 1994 and proposed work for the second quarter 1994.

First Quarter 1994 Activities:

- Blaine Tech Services, Inc. (BTS) of San Jose, California measured depths to ground water and collected ground water samples from the site wells. BTS' report describing these activities and the analytic report for the ground water samples are included as Attachment A.
- Weiss Associates (WA) compiled the ground water elevation and analytic data (Tables 1, 2 and 3) and prepared a ground water elevation contour map (Figure 2) and benzene distribution map (Figure 3).

Anticipated Second Quarter 1994 Activities:

• WA will submit a report presenting the results of the second quarter 1994 ground water sampling and ground water depth measurements. The report will include tabulated chemical analytic results, a ground water elevation contour map and a benzene concentration map.

Discussion

- BTS did not take CO₂ field measurements this quarter, but this task will be performed next quarter.
- As indicated in Table 3, dissolved oxygen concentrations appear sufficient for natural hydrocarbon biodegradation, especially in the downgradient wells.

WA has received your comments regarding the investigation status at this site.¹ You expressed concern over the possible increasing hydrocarbon concentrations in MW-5, and requested additional groundwater characterization. This quarter benzene concentrations in well MW-5 decreased to slightly above the maximum contaminated level (MCL) for drinking water. Review of the apparent hydraulic gradient indicates that in the southeastern area of the site the gradient is consistently to the west at approximately 0.05 ft/ft. But in the center of the site the gradient becomes flatter, and varies in direction from northerly (August 24, 1993) to westerly (July 7, 1992). Thus MW-5 is not consistently downgradient of the source area, and concentrations in this well may fluctuate slightly as the gradient shifts.

Since hydrocarbon concentrations in well MW-5 are generally decreasing, and since the nearest available offsite location is at least 80 feet from the site, on the northern side of High street, we do not feel that the additional characterization as requested is possible. WA recommends that quarterly sampling of wells MW-1, MW-3, MW-4, MW-5, and MW-6 continue. If, in the future, benzene concentrations in these wells do not show an increasing trend, we will request an Alternate Compliance Points closure.

Barney Chan of the Alameda County of Environmental Health, March 4, 1994 letter to Dan Kirk of Shell Oil Company.



No benzene has ever been detected in MW-2, MW-7, MW-8, or MW-10, and has only been detected once in MW-9, and total petroleum hydrocarbons as gasoline (TPH-G) levels in these wells have consistently been low or non-detectable. As outlined in WA's sampling frequency modification criteria (attachment B), WA recommends bi-annual ground water sampling of wells in which contaminant levels have consistently been near or below Department of Toxic Substance Control maximum contaminant levels for drinking water for a substantial period of time. Unless you request, within 60 days, that we continue quarterly sampling of these wells, WA will sample MW-2, MW-7, MW-8, MW-9 and MW-10 semi-annually during the second and fourth quarters.

Please call if you have any questions.

No. EG 1576 CERTIFIED ENGINEERING

GEOLOGIST

Sincerely,

Weiss Associates

John Wolf

Technical Assistant

James W. Carmody, C.E.G.

Senior Project Hydrologist

JAW/JWC: jaw

Attachments:

J:\SHELL\600\QMRPTS\602QMMA4.WP

A - BTS' Ground Water Monitoring Report

B - Sampling Frequency Modification Criteria

cc: Dan Kirk, Shell Oil Company, P.O. Box 5278, Concord, CA 94520

Paul McAllister, Shell Oil Company, P.O. Box 1380, Houston, TX 77251

Richard Hiett, Water Quality Control Board - San Francisco Bay Region, 2101 Webster

Street, Suite 500, Oakland, CA 94612

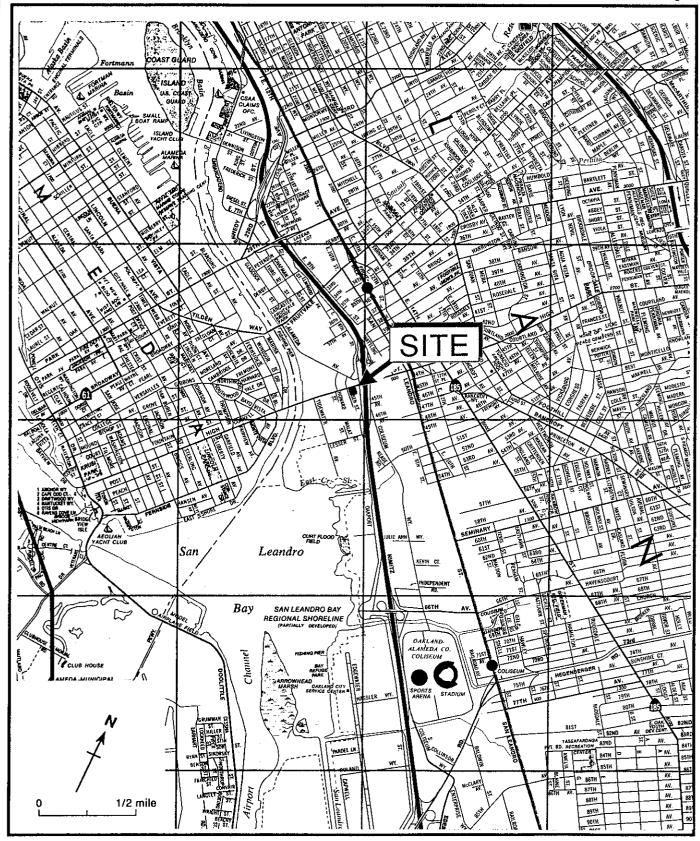


Figure 1. Site Location Map - Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California

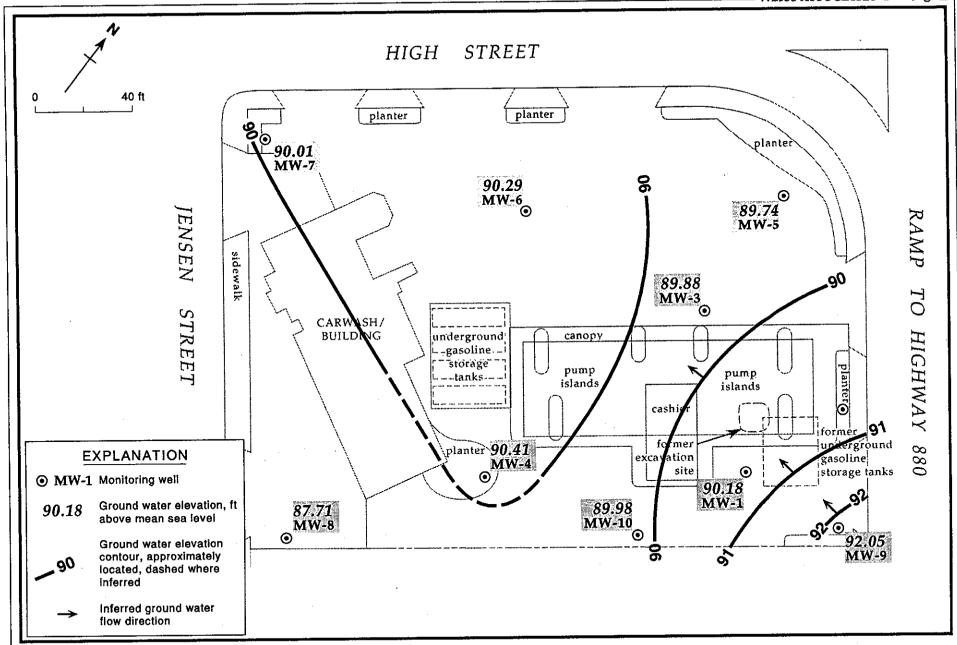


Figure 2. Monitoring Well Locations and Ground Water Elevation Contours - February 14, 1994 - Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California

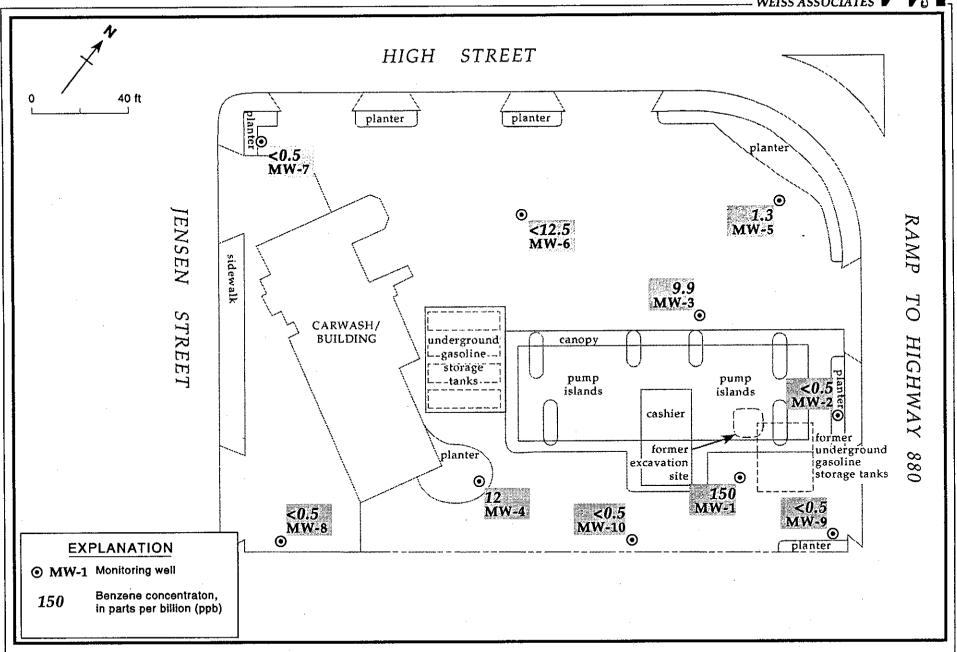


Figure 3. Benzene Concentrations in Ground Water - February 14, 1994 - Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California

Table 1. Ground Water Elevations - Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California

Well		Top-of-Casing Elevation	Depth to Water	Ground Water Elevation
ID	Date	(ft above msl)	(ft)	(ft above msl)
		,		,
MW-1	02/21/92	99.35	8.31	91.04
	05/22/92		10.02	89.33
	07/07/92		10.06	89.29
	08/20/92		10.32	89.03
	11/18/92		10.64	88.71
	02/09/93		8.71	90.64
	06/16/93		9.71	89.64
	08/24/93		10.23	89.12
	11/23/93		10.48	88.87
	02/14/94		9.17	90.18
MW-2	02/21/92	101.15	10.08	91.07
1V1 VV -Z	05/22/92	101.15	11.52	89.63
	03/22/92		11.50	89.65
	08/20/92		11.72	89.43
	11/18/92		13.06	88.09
	02/09/93		10.06	91.09
	06/16/93		11.60	89.55
	08/24/93		12.16	88.99
	11/23/93		12.74	88.41
	02/14/94		10.91	90.24
	U2/14/94		10.71	90.24
MW-3	02/21/92	99.49	8.97	90.52
	05/22/92		9.32	90.17
	07/07/92		10.22	89.27
	08/20/92		10.44	89.05
	11/18/92		10.79	88.70
	02/09/93		9.35	90.14
	06/16/93		9.56	89.93
	08/24/93		10.51	88.98
	11/23/93		10.77	88.72
	02/14/94		9.61	89.88
2 4177 4	00/01/00	00.04	7.60	01.74
MW-4	02/21/92	99.24	7.60	91.64
	05/22/92		9.90	89.34
	07/07/92		10.02	89.22
	08/20/92		10.32	88.92
	11/18/92		10.51	88.73
	02/09/93		8.13	91.11
	06/16/93		9.60	89.64

Table 1. Ground Water Elevations - Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California (continued)

Well		Top-of-Casing Elevation	Depth to Water	Ground Water Elevation
ID	Date	(ft above msl)	(ft)	(ft above msl)
	08/24/93		10.05	89.19
	11/23/93		10.05	89.99
	02/14/94		8.83	90.41
	V2111021		0.00	70.41
MW-5	02/21/92	100.08	9.24	90.84
	05/22/92		10.97	89.11
	07/07/92		10.98	89.10
	08/20/92		11.14	88.94
	11/18/92		11.21	88.87
	02/09/93		10.01	90.07
	06/16/93		11.05	89.03
	08/24/93		11.32	88.76
	11/23/93		11.35	88.73
	02/14/94		10.34	89.74
	00/01/00	00.50	7.15	01 41
MW-6	02/21/92	98.56	7.15	91.41
	05/22/92		9.55 9.53	89.01 89.03
	07/07/92	•	9.33 9.84	88.72
	08/20/92		10.03	88.53
	11/18/92		7.91	90.65
	02/09/93		8.74	90.63 89.82
	06/16/93			
	08/24/93		9.66	88.90
	11/23/93		9.86	88.70
	02/14/94		8.27	90.29
MW-7	02/21/92	97.53	6.87	90.66
	05/22/92		8.08	89.45
	07/07/92		8.82	88.71
	08/20/92		8.89	88.64
	11/18/92		9.54	87.99
	02/09/93		7.84	89.69
	06/16/93		7.80	89.73
	08/24/93		8.51	89.02
	11/23/93		8.70	88.83
	02/14/94		7.52	90.01
	00/04/00	05.40	6.54	00.50
MW-8	02/21/92	97.13	6.54	90.59
	05/22/92		7.68	89.45
	07/07/92		8.16	88.97

Table 1. Ground Water Elevations - Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California (continued)

Well ID	Date	Top-of-Casing Elevation (ft above msl)	Depth to Water (ft)	Ground Water Elevation (ft above msl)
-	09/20/02	. ""	8.25	00 00
	08/20/92 11/18/92		8.32	88.88 88.81
	02/09/93		5.58	91.55
			7.19	91.33 89.94
	06/16/93		7.19 7.98	
	08/24/93			89.15
	11/23/93	······································	8.09	89.04
	02/14/94		9,42	87.71
MW-9	02/21/92	99.72	6.91	92.81
	05/22/92		8.64	91.08
	07/07/92		7.55	92.17
	08/20/92		7.38	92.34
	11/18/92		10.17	89.55
	02/09/93		6.89	92.83
	06/16/93		8.74	90.98
	08/24/93		8.32	91.40
	11/23/93		8.17	91.55
	02/14/94		7.67	92.05
MW-10	02/21/92	98.99	9.11	89.88
14144 10	05/22/92	70.77	9.14	89.85
	07/07/92		9.87	89.12
	08/20/92		9.30	89.69
	11/18/92		10.21	88.78
*	02/09/93		7.63	91.36
	06/16/93	•	8.57	90.42
	08/24/93		9.61	89.38
	11/23/93		10.10	88.89
	02/14/94		9.01	89.98

			TPH-G	TPH-D	TPH-MO	В	E	T	X	V0Cs
:LL)	Date Sampled	Depth to Water (ft)	<			parts per b	oillion (ug/L)			>
<i>I</i> -1	02/24/92	8.31	7,300	8,900°	800	200	340	36	270	
	05/22/92	10.02	7,600	18,000 ^{ab}		140	300	<50	140	
	07/07/ 9 2	10.06								
	08/20/92	10.32	9,100	5,200°	+	530	860	340	540	
	11/18/92	10.64	15,000	4,100°		220	790	50	340	
	02/09/93	8.71	7,000	1,200		130	220	23	160	
	06/16/93	9.71	4,800			150	320	31	130	
	08/24/93	10.23	10,000			170	610	27	170	
	11/23/93	10.48	7,600			190	430	<12	140	
	11/23/93 ^{dup}	10.48	4,800			190	430	15	130	
	02/14/94 02/14/94 ^{dap}	9.17 9.17	8,000 8,900			150 160	210 230	47 45	68 76	
1-2	02/23/92	10.08	<50			<0.5	<0.5	<0.5	<0.5	
-	05/22/92	11.52	<50			<0.5	<0.5	<0.5	<0.5	
	07/07/92	11.50								
	08/20/92	11.72	<50			<0.5	<0.5	<0.5	<0.5	
	11/18/92	13.06	<50			<0.5	< 0.5	<0.5	<0.5	
	02/09/93	10.046	95	* * *		<0.5	<0.5	<0.5	<0.5	
	06/16/93	11.60	<50			<0.5	<0.5	<0.5	<0.5	
	08/24/93	12.16	<50			<0.5	<0.5	<0.5	<0.5	
	11/23/93	12.74	<50			<0.5	<0.5	<0.5	<0.5	
	02/14/94	10.91	<50		2-2	<0.5	<0.5	<0.5	<0.5	2.00
1-3	02/24/92	8.97	2,800	640°		15	<2.5	2.8	12	
	05/22/92	9.32	3,700	220 ^{ab}		27	20	11	110	
	07/07/92	10.22								
	08/20/92	10.44	13,000	340°		72	71	85	140	
	11/18/92	10.79	2,100	430°		21	11	3.6	13	
	02/09/93	9.35	3,300	83		21	6.1	5.6	<0.5	
	02/02/93 ^{dup}	9.35	3,500	130		18	7.2	8.8	<0.5	
	06/16/93	9.56	3,500 ^d			66	<0.5	6	<0.5	
	08/24/93 11/23/93	10.51 10.77	3,400 ^d 3,000			110 36	<5 6.9	<5 44	<5 23	
	02/14/94	9.61	4,700°			36 9,9	8.8	5.2	∠3 <5,0	e
1-4	02/24/92	7.60	2,000	8,300ª		31	3.5	6.3	6.6	
	05/22/92	9.90	3,600	3,400 ^{ab}		55	3	5	10	
	07/07/92	10.02	***	·						
	08/20/92	10.32	3,100	3,400		100	14	45	45	
	11/18/92	10.51	2,200	1,400		32	4.2	12	24	
	02/09/93	8.13	1,500	[*] 180		1.1	<0.5	<0.5	<0.5	
	06/16/93	9.60	1,100			120	5.1	47	19	
	08/24/93	10.05	2,700	***		46	25	11	0.97	
	11/23/93	10.25	2,500			23	3.7	5.7	16	

⁻⁻ Table 2 continues on next page --

			TPH-G	TPH-D	TPH-MO	В	Ε	T	x	VOCs
ell D	Date Sampled	Depth to Water (ft)	<		***************************************	parts per b				>
								··· ·		
	02/14/94	8.83	1,500	***	*-*	12	<2.5	7.8	<2.5	
W-5	02/23/92	9.24	240	180 ⁹	<0.5	1	<0.5	<0.5	1	
	05/22/92	10.97	6,200	7,100 ^{ab}		6	56	95	99	
	07/07/92	10.98		NA,	***					
	08/20/92	11.14	7,400	120 ^a		56	91	95	150	
	11/18/92	11.21	3,300	320°		27	20	<12.5	470	
	02/09/93	10.01	160	<50		<0.5	<0.5	<0.5	<0.5	
	06/16/93	11.05	140	***		0.8	<0.5	<0.5	<0.5	
	08/24/93	11.32	1,000			7.9	2.2	<1	<1.5	
	11/23/93	11.35	2,000			67	11	15	33	
	02/14/94	10.34	660		5.5	1,3	0.5	<0.5	0.7	
-6	02/23/92	7.15	<50	60°		<0.5	<0.5	<0.5	<0.5	
	05/22/92	9.55	<50	650 ^b		<0.5	<0.5	<0.5	<0.5	
	07/07/92	9.53		NA						
	08/20/92	9.84	140 ^d	510⁵		<0.5	<0.5	<0.5	<0.5	
	11/18/92	10.03	200 ^d	350		<0.5	<0.5	<0.5	<0.5	
	02/09/93	7.91	14,000			<0.5	<0.5	<0.5	<0.5	
	06/16/93	8.74	5,700 ^d			<0.5	<0.5	22	34	
	06/16/93 ^{dup}	8.74	5,600			<0.5	<0.5	<0.5	<0.5	
	08/24/93	9.66	4,300 ^d			<12.5	<12.5	<12.5	<12.5	
	08/24/93 ^{dup}	9.66	3,800 ^d			<12.5	<12.5	· <12.5	<12.5	
	11/23/93	9,86	3,300			<12	<12	<12	<12	nd
	02/14/94	8.27	(14,000")	***		(<12.5)	<12.5	<12.5	<12.5	***
-7	02/23/92	6.87	<50			<0.5	<0.5	<0.5	<0.5	
	05/22/92	8.08	<50	***		<0.5	<0.5	<0.5	<0.5	
	07/07/92	8.82	•							
	08/20/92	8.89	<50			<0.5	<0.5	<0.5	<0.5	
	11/18/92	9.54	<50			<0.5	<0.5	<0.5	<0.5	
	02/09/93	7.84	72			<0.5	<0.5	<0.5	<0.5	
	06/16/93	7.80	<50			<0.5	<0.5	<0.5	<0.5	
	08/24/93	8.51	<50			<0.5	<0.5	<0.5	<0.5	
	11/23/93	8.70	<50			<0.5	<0.5	<0.5	<0.5	
	02/14/94	7.52	<50			<0.5	<0.5	<0.5	<0.5	
-8	02/23/92	6.54	<50			<0.5	<0.5	<0.5	<0.5	
	05/22/92	7.68	<50			<0.5	<0.5	<0.5	<0.5	
	07/07/92	8.16				~				
	08/20/92	8.25	<50			<0.5	<0.5	<0.5	<0.5	
	11/18/92	8.32	<50			<0.5	<0.5	<0.5	<0.5	
	02/09/93	5.58	63	~ * *		<0.5	<0.5	<0.5	<0.5	
	06/16/93	7.19	<50			<0.5	<0.5	<0.5	<0.5	

⁻⁻ Table 2 continues on next page --

Depth Color Water Cft Color Color		Sampled 08/24/93 11/23/93	Water (ft)	<							
11/23/93 8.09	₩-9	11/23/93		<u></u>			parts per h	oillion (ug/L)	,		>
02/14/94 9.42 <50	u-9	11/23/93	7.98		***					<0.5	
02/14/94 9.42 <	-9	02/14/04					<0.5	<0.5	<0.5	<0.5	
05/22/92 8,64 <50	i-9	04/14/34			1.5 1 .88	***	<0,5				
07/07/92 7.55 08/20/92 7.38 <50	· · .										
07/07/92 7.55 08/20/92 7.38	-	05/22/92		<50			<0.5	<0.5	<0.5	<0.5	
08/20/92 7.38		07/07/92	7.55								
08/20/92 ⁶⁰⁰ 7.38 50		08/20/92	7.38					<0.5	<0.5	<0.5	
11/18/92		08/20/92 ^{dup}	7.38	<50			<0.5	<0.5			
11/18/92 ⁶⁰⁰ 10.17		11/18/92									
02/09/93 6.89 290 110 6 < <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0		11/18/92 ^{dup}									
06/16/93 8.74 90 ^d											
08/24/93 8.32 50 ⁶											
11/23/93 8.17 <50											
02/14/94 7.67 <50 < < < < < < < < <-		11/27/07									
05/22/92 9.14 <50 310 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5			7.67								nd ***
05/22/92 9.14 <50 310 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5	ı-10	02/23/92	9_11	<50	120		<0.5	<0.5	<0.5		
07/07/92 9.87		05/22/92									
08/20/92 9.30 <50 460 <0.5 <0.5 <0.5 <0.5 <0.5 <11/1/18/92 10.21 <50 470 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5		07/07/92									
11/18/92 10.21 <50						* * -					
02/09/93 7.63 <50 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5											
06/16/93 8.57 <50 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5											
08/24/93 9.61 <50 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5											
11/23/93 10.10 <50 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5											
02/11/94 9.01 <50											
ravel 02/24/92		02/11/94	9.01					<0.5			
tank 05/22/92 <50	avel	02/24/92		<50			<0.5	<0.5	<0.5	<0.5	
08/20/92 <50					•						
11/18/92 <50	. CI IIC										
02/09/93 <50											
06/16/93 <50											
08/24/93						•					
11/23/93 <50 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5											
02/14/94 <50 <0.5 <0.5 <0.5 <0.5											
iler 08/20/92 <50 <0.5 <0.5 <0.5 <0.5						***					
	ailer	08/20/92		<50			<0.5	<0.5	<0.5	<0.5	
lank 11/18/92 <50 <0.5 <0.5 <0.5 <0.5											

⁻⁻ Table 2 continues on next page --

Table 2. Analytical Results for Ground Water Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California (continued)

Abbreviations:

TPH-G = Total petroleum hydrocarbons as gasoline by Modified EPA Method 8015

TPH-D = Total petroleum hydrocarbons as diesel by Modified EPA Method 8015

TPH-MO = Total petroleum hydrocarbons as motor oil by EPA Method 8015

B = Benzene by EPA Method

E = Ethylbenzene by EPA Method

T = Toluene by EPA Method

X = Xylenes by EPA Method

VOC = Volatile organic compounds by EPA Method 8240

NE = Not established

--- = Not analyzed

<n = Not detected at detection limits of n ppb</pre>

DTSC MCLs = California Department of Toxic Substances Control maximum contaminant levels for drinking water

nd = not detected at or above the reporting limit for the analysis as performed

dup = Duplicate sample

Notes:

- a = Concentration reported as diesel is primarily due to the presence of a lighter petroleum product, possible gasoline or kerosene
- b = Concentration reported as diesel is primarily due to a heavier petroleum product, possible motor oil or aged diesel fuel
- c = Compounds detected within the diesel range are not characteristics of the standard diesel chromatographic pattern
- d = Concentration reported as gasoline is partially or primarily due to the presence of a discrete hydrocarbon peak not indicative of gasoline
- e = 26 ppb benzene detected using EPA Method 8240
- f = The concentration reported as gasoline for MW-3 is due to the presence of a combination of gasoline and a discrete peak not indicative of gasoline
- g = Compounds detected and calculated as diesel appear to be the less volatile constituents of gasoline
- h = The concentration reported as gasoline for sample MW-6 is primarily due to the presence of a discrete peak not indicative of gasoline
- i = DTSC recommended action level: MCL not established

Table 3. Analytical Results for Nutrients, Hydrocarbon Utilizing Bacteria and Dissolved Oxygen for Shell Service Station WIC #204-5508-5801, 630 High Street, Oakland, California

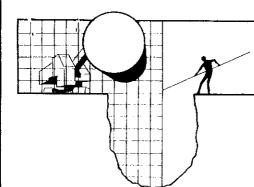
Well	Date Sampled	Potassium (mg/L)	Phosphorous (mg/L)	Phosphate (mg/L)	Kjeldahl Nitrogen (mg/L)	Heterotrophic Bacteria Plate Count (CFU/ml)	Hydrocarbon Utilizing Bacteria (CFU/ml)	Dissolved Oxygen ^a (mg/L)
MW-1	06/17/93 08/24/93 11/23/93 02/14/94	12.0	0.80	. 2.4	5.4	80,000	310	1.73/1.58 1.49/1.70 1.77/2.80 6.2/2.5
MW-4	06/17/93 08/24/93 11/23/93 02/14/94	1.5	3.50	11.0	4.2	8,200	200	1.86/4.82 1.46/1.27 5.29/6.59 2.1/1.9
MW-5	06/17/93 08/24/93 11/23/93 02/14/94	8.8	0.07	0.21	1.0	3,200	490	1.53/2.72 2.69/1.41 8.20/3.09 2.0/1.9
MW-6	06/17/93 08/24/93 11/23/93 02/14/94	0.8	0.06	0.19	1.1	2,000	450	8.46/9.73 2.15/1.52 3.86/6.75 2.3/5.2
MW-9	06/17/93 08/24/93 11/23/93 02/14/94	14.0	0.22	0.66	0.8	9,200	2,300	1.51/2.17 2.86/2.74 3.41/3.78 4.6/5.2

Abbreviations and Notes:

CFU/ml = Colony forming units per milliliter a = Field measurement of dissolved oxygen concentrations before and after well purging

ATTACHMENT A

BTS' GROUND WATER MONITORING REPORT AND ANALYTIC REPORT



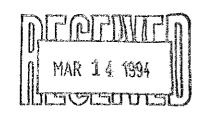
BLAINE TECH SERVICES INC.

985 TIMOTHY DRIVE SAN JOSE, CA 95133 (408) 995-5535 FAX (408) 293-8773

March 8, 1994

Shell Oil Company P.O. Box 5278 Concord, CA 94520-9998

Attn: Daniel T. Kirk



SITE: Shell WIC #204-5508-5801 630 High Street Oakland, California

QUARTER: 1st quarter of 1994

QUARTERLY GROUNDWATER SAMPLING REPORT 940214-Z-1

This report contains data collected during routine inspection, gauging and sampling of groundwater monitoring wells performed by Blaine Tech Services, Inc. in response to the request of the consultant who is overseeing work at this site on behalf of our mutual client, Shell Oil Company. Data collected in the course of our field work is presented in a TABLE OF WELL GAUGING DATA. The field information was collected during our preliminary gauging and inspection of the wells, the subsequent evacuation of each well prior to sampling, and at the time of sampling.

Measurements taken include the total depth of the well and the depth to water. The surface of water was further inspected for the presence of immiscibles which may be present as a thin film (a sheen on the surface of the water) or as a measurable free product zone (FPZ). At intervals during the evacuation phase, the purge water was monitored with instruments that measure electrical conductivity (EC), potential hydrogen (pH), temperature (degrees Fahrenheit), and turbidity (NTU). In the interest of simplicity, fundamental information is tabulated here, while the bulk of the information is turned over directly to the consultant who is making professional interpretations and evaluations of the conditions at the site.

STANDARD PROCEDURES

Evacuation

Groundwater wells are thoroughly purged before sampling to insure that the sample is collected from water that has been newly drawn into the well from the surrounding geologic formation. The selection of equipment to evacuate each well is based on the physical characteristics of the well and what is known about the performance of the formation in which the well has been installed. There are several suitable devices which can be used for evacuation. The most commonly employed devices are air or gas actuated pumps, electric submersible pumps, and hand or mechanically actuated bailers. Our personnel frequently employ USGS/Middleburg positive displacement pumps or similar air actuated pumps which do not agitate the water standing in the well.

Normal evacuation removes three case volumes of water from the well. More than three case volumes of water are removed in cases where more evacuation is needed to achieve stabilization of water parameters and when requested by the local implementing agency. Less water may be removed in cases where the well dewaters and does not recharge to 80% of its original volume within two hours and any additional time our personnel have reason to remain at the site. In such cases, our personnel return to the site within twenty four hours and collect sample material from the water which has recharged into the well case.

Decontamination

All apparatus is brought to the site in clean and serviceable condition. The equipment is decontaminated after each use and before leaving the site. Effluent water from purging and on-site equipment cleaning is collected and transported to Shell's Martinez Manufacturing Complex in Martinez, California.

Free Product Skimmer

The column headed, VOLUME OF IMMISCIBLES REMOVED (ml) is included in the TABLE OF WELL GAUGING DATA to cover situations where a free product skimming device must be removed from the well prior to gauging. Skimmers are installed in wells with a free product zone on the surface of the water. The skimmer is a free product recovery device which often prevents normal well gauging and free product zone measurements. The 2.0" and 3.0" PetroTraps fall into the category of devices that obstruct normal gauging. In cases where the consultant elects to have our personnel pull the skimmers out of the well and gauge the well, our personnel perform the additional task of draining the accumulated free product out of the PetroTrap before putting it back in the well. This

recovered free product is measured and logged in the VOLUME OF IMMISCIBLES REMOVED column. Gauging at such sites is performed in accordance with specific directions from the professional consulting firm overseeing work at the site on Shell's behalf.

Sample Containers

Sample material is collected in specially prepared containers which are provided by the laboratory that performs the analyses.

Sampling

Sample material is collected in stainless steel bailer type devices normally fitted with both a top and a bottom check valve. Water is promptly decanted into new sample containers in a manner which reduces the loss of volatile constituents and follows the applicable EPA standard for handling volatile organic and semi-volatile compounds.

Following collection, samples are promptly placed in an ice chest containing prefrozen blocks of an inert ice substitute such as Blue Ice or Super Ice. The samples are maintained in either an ice chest or a refrigerator until delivered into the custody of the laboratory.

Sample Designations

All sample containers are identified with a site designation and a discrete sample identification number specific to that particular groundwater well. Additional standard notations (e.g. time, date, sampler) are also made on the label.

Chain of Custody

Samples are continuously maintained in an appropriate cooled container while in our custody and until delivered to the laboratory under a standard Shell Oil Company chain of custody. If the samples are taken charge of by a different party (such as another person from our office, a courier, etc.) prior to being delivered to the laboratory, appropriate release and acceptance records are made on the chain of custody (time, date, and signature of the person releasing the samples followed by the time, date and signature of the person accepting custody of the samples).

Hazardous Materials Testing Laboratory

The samples obtained at this site were delivered to Anametrix, Inc. in San Jose, California. Anametrix, Inc. is a California Department of Health Services certified Hazardous Materials Testing Laboratory and is listed as DOHS HMTL #1234.

Objective Information Collection

Blaine Tech Services, Inc. performs specialized environmental sampling and documentation as an independent third party. In order to avoid compromising the objectivity necessary for the proper and disinterested performance of this work, Blaine Tech Services, Inc. performs no consulting and does not become involved in the marketing or installation of remedial systems of any kind. Blaine Tech Services, Inc. is concerned only with the generation of objective information, not with the use of that information to support evaluations and recommendations concerning the environmental condition of the site. Even the straightforward interpretation of objective analytical data is better performed by interested regulatory agencies, and those engineers and geologists who are engaged in the work of providing professional opinions about the site and proposals to perform additional investigation or design remedial systems.

Reportage

Submission of this report and the attached laboratory report to interested regulatory agencies is handled by the consultant in charge of the project. Any professional evaluations or recommendations will be made by the consultant under separate cover.

Please call if we can be of any further assistance.

Richard C. Blaine

RCB/lp

attachments: table of well gauging data

chain of custody

certified analytical report

cc: Weiss Associates

5500 Shellmound Street Emeryville, CA 94608-2411 ATTN: Michael Asport

TABLE OF WELL GAUGING DATA

WELL I.D.	DATA COLLECTION DATE	MEASUREMENT REFERENCED TO	QUALITATIVE OBSERVATIONS	DEPTH TO FIRST IMMISCIBLES LIQUID (FPZ)	THICKNESS OF IMMISCIBLES LIQUID ZONE	VOLUME OF IMMISCIBLES REMOVED	DEPTH TO WATER	DEPTH TO WELL BOTTOM
			(sheen)	(feet)	(feet)	(ml)	(feet)	(feet)
MW-1 •	2/14/04	TOO		110115				
	2/14/94	TOC		NONE		-	9.17	13.83
MW-2	2/14/94	TOC	_	NONE	=		10.91	19.08
MW-3	2/14/94	TOC	ODOR	NONE	_		9.61	17.26
MW-4	2/14/94	TOC	ODOR	NONE			8.83	18.23
MW-5	2/14/94	TOC	ODOR	NONE			10.34	17.76
MW-6	2/14/94	TOC		NONE			8.27	19.34
MW-7	2/14/94	TOC	**	NONE			7.52	19.38
MW-8	2/14/94	TOC		NONE			9.42	20.53
MW-9	2/14/94	TOC		NONE	40-94		7.67	11.45
MW-10	2/14/94	TOC		NONE				
14144 . 10	21 171 14	100		NONE			9.01	12.50

^{*} Sample DUP was a duplicate sample taken from well MW-1.

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(18)	cn	10:35
(18)	cn	10:35

	SHELL RETAIL E	NG -	WE:	ST			СН	All Ser	1 O	F C	:US	102	Υ (4-	REC	ORD	Date: 2/14/74 Page of Z						
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	WIC#: 2011 - S	50	7 - 0	- - - -	,										•					CHECK ONE (1) 10X ONLY	CT/OI	TURN AROUND TIME
	Shell Engineer: Phone No.: 5/0 Fax #675-6/60 Consultant Name & Address: Phone No.: 408 The Thirty Drive Consultant Contact: Phone No.: 408 The State Fax #: 293-877 Comments: Sampled by: Fax #: 293-877									320/602)	anics (EPA 8240)	osal	n TPH 8015 & BTEX 8020	,		•	9	Jæd	Y/N	Sol Clously/Disposed Wester Clously/Disposed Solf/Alt Sem. or Sys. C & M] HES] HES] HES] HES	24 hours 44 hours 16 days (Hormon Other 16 days 16 days 17 days 18 days
				Soll	Water	Alr	No. of	TPH (EPA 8015	TPH (EPA 8015 Mod, Diesel)	BTEX (EPA 8020/602)	Volatile Organics (EPA	Test for Disposal	Combinetion IPH			Asbesfos	Container Size	Preparation Used	Composite Y	MATERIAL DESCRIPTION	,	SAMPLÉ CONDITION/ COMMENTS
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)	MW-6	o			X		3						X							-		
)	NW-7	,,	-		X		5						X									
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d	Relinquished By (signature): Ethiled Name: Relinquished By (signature): Printed Name: IHE LABORATORY MUST PROY							Date Time	o:0} o:≥⊀ o: ∠? o:						Ny S. CARRIS d Name: ir NoBJrSer d Name:		Dale: 2-15-74 Rme: 2820 Dale: 2-18-94 Time: 8:3-7 Dale: Time:					

9402157

(18) cm 10:35

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	204-5	50	8 - 5	580	/										-			Γ.	Γ	CHECK OHE (1) BOX OHLY			ROUND TIME
	Consultant Contact: JANIEC Consultant Name & 185 7 Morris Consultant Contact: JIM KELL Comments:	408 5-8773	1 ~	8015 Mod. Diesel).	/602)	cs (EPA 8240)	Į	7H 8015 & BTEX 8020			٠		9		Quadedy Montaring Size investigation Soli Clausy/Duporal Water Clausy/Duporal Soli/Altern or Sys. O a M) +42) +42) +42) +42	01λ+r 11ΟΝ: Η	(Hermon)					
ļ	Sampled by:	_		-				(EPA 8015 Mod.	8015 /	A 8020	Organi	İsposo	ff noth				Size	on Use	N/X e	Other]. [
	Sample ID	Date	Sludge	Soll	Water	1!A	No. of	IPH (EPA	TPH (EPA	BTEX (EPA 8020/602)	Volatile Organics (EPA	Test for Disposal	Combination 1PH			Asbestos	Container Size	Preparation Used	Composite	MATERIAL DESCRIPTION		OND	APLE MION/ MENTS
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1961 Concourse Drive Suite E San Jose, CA 95131 Tel: 408-452-8192 Fax: 408-432-8198

MR. JIM KELLER BLAINE TECH 985 TIMOTHY DRIVE SAN JOSE, CA 95133 Workorder # : 9402157 Date Received : 02/15/94

Project ID : 204-5508-5801

Purchase Order: MOH-B813

The following samples were received at Anametrix for analysis :

ANAMETRIX ID	CLIENT SAMPLE ID
9402157- 1	MW-1
9402157- 2	MW-2
9402157- 3	MW-3
9402157- 4	MW-4
9402157- 5	MW-5
9402157- 6	MW-6
9402157- 7	MW-7
9402157- 8	MW-8
9402157- 9	MW-9
9402157-10	MW-10
9402157-11	TB
9402157-11	DUP

This report consists of 11 pages not including the cover letter, and is organized in sections according to the specific Anametrix laboratory group which performed the analysis(es) and generated the data.

The results contained within this report relate to only the sample(s) tested. Additionally, these data should be considered in their entirety and Anametrix cannot be responsible for the detachment, separation, or otherwise partial use of this report.

Anametrix is certified by the California Department of Health Services (DHS) to perform environmental testing under Certificate Number 1234.

If you have any further questions or comments on this report, please call us as soon as possible. Thank you for using Anametrix.

Doug Robbins Laboratory Director 2-25-94

REPORT SUMMARY ANAMETRIX, INC. (408)432-8192

MR. JIM KELLER BLAINE TECH 985 TIMOTHY DRIVE SAN JOSE, CA 95133

Workorder # : 9402157 Date Received: 02/15/94

Project ID : 204-5508-5801

Purchase Order: MOH-B813

Department : GC Sub-Department: TPH

SAMPLE INFORMATION:

ANAMETRIX SAMPLE ID	CLIENT SAMPLE ID	MATRIX	DATE SAMPLED	METHOD
9402157- 1	MW-1	WATER	02/14/94	TPHgBTEX
9402157- 2	MW-2	WATER	02/14/94	TPHgBTEX
9402157- 3	MW-3	WATER	02/14/94	TPHgBTEX
9402157- 4	MW-4	WATER	02/14/94	TPHgBTEX
9402157- 5	MW-5	WATER	02/14/94	TPHgBTEX
9402157- 6	MW-6	WATER	02/14/94	TPHgBTEX
9402157- 7	MW-7	WATER	02/14/94	TPHgBTEX
9402157- 8	MW-8	WATER	02/14/94	ТРНЭВТЕХ
9402157- 9	MW-9	WATER	02/14/94	TPHgBTEX
9402157-10	MW-10	WATER	02/14/94	TPHgBTEX
9402157-11	ТВ	WATER	02/14/94	TPHgBTEX
9402157-12	DUP	WATER	02/14/94	ТРНЭВТЕХ

REPORT SUMMARY ANAMETRIX, INC. (408)432-8192

MR. JIM KELLER BLAINE TECH 985 TIMOTHY DRIVE SAN JOSE, CA 95133 Workorder # : 9402157 Date Received : 02/15/94 Project ID : 204-5508-5801

Purchase Order: MOH-B813

Department : GC Sub-Department: TPH

QA/QC SUMMARY :

- The concentration reported as gasoline for sample MW-3 is due to the presence of a combination of gasoline and a discrete peak not indicative of gasoline.

- The concentration reported as gasoline for sample MW-6 is primarily due to the presence of a discrete peak not indicative of gasoline.

Cheyl Balmer 4/21/99
Department Supervisor Date

Chemist Chemist

02/22/24

Date

Organic Analysis Data Sheet Total Petroleum Hydrocarbons as Gasoline with BTEX ITS - Anametrix Laboratories - (408)432-8192

Lab Workorder : 9402157

Client Project ID : 204-5508-5801

Matrix : WATER

Units : ug/L

		Client ID	Client ID	Client ID	Client ID	Client ID
	Method	MW-1	MW-2	MW- 3	MW-4	MW-5
	Reporting	Lab ID	Lab ID	Lab ID	Lab ID	Lab ID
Compound Name	Limit*	9402157-01	9402157-02	9402157-03	9402157-04	9402157-05
Benzene	0.50	150	ND	9.9	12	1.3
Toluene	0.50	47	ND	5.2	7.8	ND
Ethylbenzene	0.50	210	ND	8.8	<2.5	0.50
Total Xylenes	0.50	68	ND	<5.0	<2.5	0.70
TPH as Gasoline	50	8000	ND	4700	1500	660
Surrogate Recovery		137%	124%	136%	127%	106%
Instrument ID		HP12	HP12	HP12	HP12	HP12
Date Sampled		02/14/94	02/14/94	02/14/94	02/14/94	02/14/94
Date Analyzed		02/17/94	02/17/94	02/17/94	02/17/94	02/18/94
RLMF		25	1	10	5	1
Filename Reference		FPF15701.D	FPF15702.D	FPF15703.D	FPF15704.D	FRF15705.D

^{*} The Method Reporting Limit must be multiplied by the Reporting Limit Multiplication Factor (RLMF) to achieve the compound's reporting limit in the analysis.

ND : Not detected at or above the reporting limit for the analysis as performed.

TPHg : Determined by GC/FID following sample purge & trap by EPA Method 5030.

02/22/94

BTEX : Determined by modified EPA Method 8020 following sample purge & trap by EPA Method 5030.

Lab Control Limits for surrogate compound p-Bromofluorobenzene are 61-139%.

All testing procedures follow California Department of Health Services (Cal-DHS) approved methods.

Analyst

Date

Supervisor

Dot

Organic Analysis Data Sheet Total Petroleum Hydrocarbons as Gasoline with BTEX ITS - Anametrix Laboratories - (408)432-8192

Lab Workorder : 9402157

Client Project ID : 204-5508-5801

Matrix : WATER

Units : ug/L

		Client ID				
	Method	MW-6	MW-7	MW-8	MW-9	MW-10
	Reporting	Lab ID				
Compound Name	Limit*	9402157-06	9402157-07	9402157-08	9402157-09	9402157-10
Benzene	0.50	<12.5	ND	ND	ND	ND
Toluene	0.50	<12.5	ND	ND	ND	ND
Ethylbenzene	0.50	<12.5	ND	ND	ND	ND
Total Xylenes	0.50	<12.5	ND	ND	ND	ND
TPH as Gasoline	50	14000	ND	ND	ND	ND
Surrogate Recovery		139%	125%	127%	109%	125%
Instrument ID		HP12	HP12	HP12	HP12	HP12
Date Sampled		02/14/94	02/14/94	02/14/94	02/14/94	02/14/94
Date Analyzed		02/17/94	02/17/94	02/17/94	02/18/94	02/17/94
RLMF		25	1	1	1	1
Filename Reference		FPF15706.D	FPF15707.D	FPF15708.D	FRF15709.D	FPF15710.D

^{*} The Method Reporting Limit must be multiplied by the Reporting Limit Multiplication Factor (RLMF) to achieve the compound's reporting limit in the analysis.

ND : Not detected at or above the reporting limit for the analysis as performed.

TPHg: Determined by GC/FID following sample purge & trap by EPA Method 5030.

02122194

BTEX : Determined by modified EPA Method 8020 following sample purge & trap by EPA Method 5030.

Lab Control Limits for surrogate compound p-Bromofluorobenzene are 61-139%.

All testing procedures follow California Department of Health Services (Cal-DHS) approved methods.

Analyst

Date

Supervisor

D∂-/⊊∽ Date

Organic Analysis Data Sheet Total Petroleum Hydrocarbons as Gasoline with BTEX ITS - Anametrix Laboratories - (408)432-8192

Lab Workorder : 9402157

Client Project ID : 204-5508-5801

Matrix : WATER

Units : ug/L

		Client ID	Client ID	Client ID	Client ID	Client ID
	Method	TB	DUP	***************************************	***************************************	***************************************
	Reporting	Lab ID	Lab ID	Lab ID	Lab ID	Lab ID
Compound Name	Limit*	9402157-11	9402157-12	Method Blank	Method Blank	
Benzene	0.50	ND	160	ND	ND	
Toluene	0.50	ND	45	ND	ND	
Ethylbenzene	0.50	ND	230	ND	ND	
Total Xylenes	0.50	ND	76	ND	ND	
TPH as Gasoline	50	ND	8900	ND	ND	
Surrogate Recovery		121%	136%	124%	124%	
Instrument ID		HP12	HP12	HP12	HP12	
Date Sampled		02/14/94	02/14/94	N/A	N/A	
Date Analyzed		02/17/94	02/17/94	02/17/94	02/18/94	· · · <u>· · · · · · · · · · · · · · · · </u>
RLMF		1	25	1	1	
Filename Reference		FPF15711.D	FPF15712.D	BF1701E1.D	BF1801E1.D	

^{*} The Method Reporting Limit must be multiplied by the Reporting Limit Multiplication Factor (RLMF) to achieve the compound's reporting limit in the analysis.

ND : Not detected at or above the reporting limit for the analysis as performed.

TPHg : Determined by GC/FID following sample purge & trap by EPA Method 5030.

BTEX : Determined by modified EPA Method 8020 following sample purge & trap by EPA Method 5030.

Lab Control Limits for surrogate compound p-Bromofluorobenzene are 61-139%.

All testing procedures follow California Department of Health Services (Cal-DHS) approved methods.

02/22/94

Analyst

Date

Supervisor Balman

2/02/94

Date

Matrix Spike Report

Total Petroleum Hydrocarbons as BTEX

ITS - Anametrix Laboratories - (408)432-8192

Project ID

: 204-5508-5801

Laboratory ID : 9402157-02

Sample ID

: MW-2

Analyst: Nº

Matrix

Supervisor : 6

: WATER

Date Sampled : 02/14/94

Instrument ID : HP12

COMPOUND NAME	SPIKE	SAMPLE	MS	MSD	RECOVERY	RPD	RPD
	AMOUNT	RESULTS	RECOVERY	RECOVERY	LIMITS		LIMITS
Benzene	20	ND	95%	95%	45-139	0%	30
Toluene	20	ND	100%	100%	51-138	0%	30
Ethylbenzene	20	ND	105%	110%	48-146	-5%	30
Total Xylenes	20	ND	105%	105%	50-139	0%	30
Surrogate Recovery		124%	111%	132%			
Date Analyzed		02/17/94	02/17/94	02/17/94			
Multiplier		1	1	1			
Filename Reference		FPF15702.D	FMF15702.D	FDF15702.D			

^{*} Limits established by Inchcape Testing Services, Anametrix Laboratories.

Matrix Spike Report

Total Petroleum Hydrocarbons as Gasoline ITS - Anametrix Laboratories - (408)432-8192

Project ID

: 204-5508-5801

Laboratory ID : 9402157-07

Sample ID

: MW-7

Analyst: N

Matrix

Supervisor : 6

Date Sampled : 02/14/94

: WATER

Instrument ID : HP12

COMPOUND NAME	SPIKE	SAMPLE	MS	MSD	RECOVERY	RPD	RPD
	AMOUNT	RESULTS	RECOVERY	RECOVERY	LIMITS		LIMITS
Gasoline	500	ND	94%	78%	50-139	19%	30
Surrogate Recovery		125%	110%	129%			
Date Analyzed		02/17/94	02/17/94	02/17/94			
Multiplier		1	1	1			
Filename Reference		FPF15707.D	FMF15707.D	FDF15707.D			

^{*} Limits established by Inchcape Testing Services, Anametrix Laboratories.

Matrix Spike Report

Total Petroleum Hydrocarbons as BTEX

ITS - Anametrix Laboratories - (408)432-8192

Project ID

: 204-5508-5801

Laboratory ID : 9402157-09

Sample ID

: MW-9

Analyst : AP

Matrix

: WATER

Supervisor : 43

Date Sampled: 02/14/94

.

Instrument ID : HP12

COMPOUND NAME	SPIKE	SAMPLE	MS	MSD	RECOVERY	RPD	RPD
	AMOUNT	RESULTS	RECOVERY	RECOVERY	LIMITS		LIMITS
Benzene	20	ND	80%	90%	45-139	-12%	30
Toluene	20	ND	80%	90%	51-138	-12%	30
Ethylbenzene	20	ND	90%	90%	48-146	0%	30
Total Xylenes	20	ND	80%	95%	50-139	-17%	30
Surrogate Recovery		109%	103%	107%			
Date Analyzed		02/18/94	02/18/94	02/18/94			
Multiplier		1	1	1			
Filename Reference		FRF15709.D	FMF15709.D	FDF15709.D			

^{*} Limits established by Inchcape Testing Services, Anametrix Laboratories.

Laboratory Control Spike Report Total Petroleum Hydrocarbons as Gasoline ITS - Anametrix Laboratories - (408)432-8192

Instrument ID : HP12

Analyst: AP

Matrix : LIQUID

Supervisor : 🚜

COMPOUND NAME	SPIKE	LCS	RECOVERY
	AMOUNT	RECOVERY	LIMITS
Gasoline	500	90%	56-141
Surrogate Recovery		113%	61-139
Date Analyzed		02/17/94	
Multiplier		1	
Filename Reference		MF1702E1.D	

^{*} Limits established by Inchcape Testing Services, Anametrix Laboratories.

Laboratory Control Spike Report Total Petroleum Hydrocarbons as BTEX ITS - Anametrix Laboratories - (408)432-8192

Instrument ID : HP12

Analyst: A

Matrix : LIQUID

Supervisor : 6

COMPOUND NAME	SPIKE	LCS	RECOVERY
	AMOUNT	RECOVERY	LIMITS
Benzene	20	100%	52-133
Toluene	20	105%	57-136
Ethylbenzene	20	110%	56-139
Total Xylenes	20	110%	56-141
Surrogate Recovery		113%	61-139
Date Analyzed		02/17/94	
Multiplier		1	
Filename Reference		MF1701E1.D	

^{*} Limits established by Inchcape Testing Services, Anametrix Laboratories.

Laboratory Control Spike Report Total Petroleum Hydrocarbons as BTEX ITS - Anametrix Laboratories - (408)432-8192

Instrument ID : HP12

Analyst: \mathcal{M}

Matrix : LIQUID

Supervisor : 49

COMPOUND NAME	SPIKE	LCS	RECOVERY
	AMOUNT	RECOVERY	LIMITS
Benzene	20	80%	52-133
Toluene	20	80%	57-136
Ethylbenzene	20	85%	56-139
Total Xylenes	20	85%	56-141
Surrogate Recovery		104%	61-139
Date Analyzed		02/18/94	
Multiplier		1	
Filename Reference		MF1801E1.D	

^{*} Limits established by Inchcape Testing Services, Anametrix Laboratories.

ATTACHMENT B

SAMPLING FREQUENCY MODIFICATION CRITERIA

SAMPLING FREQUENCY CRITERIA

Weiss Associates (WA) has developed a technical approach for determining appropriate ground water monitoring well sampling frequencies for service station monitoring programs. Ground water monitoring wells are typically sampled quarterly at service stations to monitor the concentration and extent of hydrocarbons and/or volatile organic compounds (VOCs) in ground water. This satisfies California Regional Water Quality Control Board (RWQCB) ground water monitoring guidelines which state: "Quarterly (ground water) monitoring is the maximum sampling interval typically allowed when ground water contamination is present unless other arrangements are made with Regional (Water Quality Control) Board staff¹¹. San Francisco Bay RWQCB personnel have indicated that the RWQCB will allow well sampling frequency reductions on a site specific basis if the frequency reductions are justified by site conditions. Presented below are generalized criteria we have developed for determining the appropriate well sampling frequencies based on specific site conditions.

CRITERIA FOR REDUCING SAMPLING FREQUENCY

The generalized criteria we have developed for determining whether sampling frequency should be modified for a given well includes:

- The reliability of the ground water analytic data,
- The trend of the dissolved hydrocarbon and/or VOCs concentrations in the well, and
- The location of the well in relation to the hydrocarbon and/or VOCs source.

Each of these factors is discussed below.

Reliability of Ground Water Analytic Data

The reproducibility of ground water analytic data is highly sensitive to geologic conditions, ground water elevations, field sampling procedures and laboratory analytic procedures. Of these controlling factors, ground water fluctuations usually have the greatest impact on data reproducibility. Since ground water elevations at most sites fluctuate during

North Coast, San Francisco Bay, Central Valley Regional Water Quality Control Boards, June 2, 1988 (revised May 18, 1989), "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks; pg. 12

the course of a year, ground water should be monitored for at least one year to assess the impact of ground water fluctuations on data reproducibility. RWQCB guidelines also stipulate sampling all monitoring wells at least quarterly for one year when hydrocarbons are detected in the well. Therefore, WA recommends reducing the sampling frequency only for wells which:

- · Have been sampled at least four times over a period of one year, and
- Have consistent historic analytic results allowing a reliable assessment of the representative hydrocarbon concentrations in the ground water.

Although it may be possible to statistically quantify the reliability of the analytic data, this effort may not produce useful results. Therefore, we will evaluate the reliability of the data subjectively. If the variability of the analytic data prevents a reliable assessment of concentrations then we recommend sampling the well(s) quarterly until a reliable assessment can be made.

Concentration Trends

Sampling frequency should be reduced only for wells showing stable or decreasing concentration trends. Wells showing increasing concentration trends should be sampled quarterly to monitor the trends and determine whether the hydrocarbon concentration in a particular well is approaching a threshold, such as the saturation concentration, maximum contaminant level (MCL) or the recommended action level.

Well Location

For most sites, four to ten ground water monitoring wells are typically required to fully define the extent of hydrocarbons in ground water. These wells generally fall into one of four classifications relative to the hydrocarbon source:

- 1) Clean upgradient and crossgradient wells,
- 2) Source-area wells with high hydrocarbon concentrations,
- 3) Intermediate wells with low to high hydrocarbon concentrations located between the source-area wells and clean crossgradient and downgradient wells, and
- 4) Clean downgradient wells.

WA's recommended sampling frequency for each of these classifications is as follows:

- 1) If no hydrocarbons are detected in the upgradient and crossgradient wells, and if no offsite sources are suspected upgradient or crossgradient of the site, WA recommends sampling these wells annually.
- 2) Source-area wells are used to monitor concentrations from source-area releases and determine effectiveness of natural biodegradation and/or site remediation. To ensure that increasing source-area concentration trends are detected, WA recommends sampling these wells biannually.
- 3) Intermediate wells are used to track dissolved hydrocarbon concentrations and the rates of natural biodegradation or the effectiveness of site remediation. Therefore, WA recommends sampling these wells biannually. However, if there are more than four intermediate wells, we recommend sampling each of the intermediate wells annually during different quarters.
- 4) Since clean downgradient wells define the "leading edge" of dissolved hydrocarbons in ground water and are used to determine hydrocarbon breakthrough, WA recommends sampling these wells quarterly.

Other Considerations

If hydrocarbon concentrations in ground water from all site wells are near or below MCLs, we recommend sampling all site wells biannually or annually, depending on the number of wells, well locations with respect to potential source areas, and ground water depth fluctuations. Annual sampling should be sufficient for sites with:

- Large numbers of wells,
- · Wells located immediately downgradient of potential source areas, and
- Stable ground water depths.

Sites without these characteristics may need biannual sampling.

Upgradient and/or crossgradient wells that contain hydrocarbons or other contaminants from offsite sources should be sampled biannually to monitor offsite contributions of contaminants to the site.

A decision flow chart graphically presenting the recommended sampling frequency based on these criteria is included as Figure 1. Although there may be wells that do not fall into the location and concentration classifications listed in the flow chart, the generalized criteria may be used to evaluate the appropriate sampling frequency on a case by case basis.

SUMMARY

In summary, WA recommends reducing sampling frequencies for all ground water monitoring wells with:

- · Ground water samples collected for four consecutive quarters,
- Reliable ground water analytic results, and
- · No significantly increasing concentration trends.

The sampling frequency for individual wells should be modified based on the well location relative to the contaminant source, as follows:

- · Annually for clean upgradient and crossgradient wells,
- Biannually for upgradient and crossgradient wells containing hydrocarbons or other contaminants from an offsite, upgradient source,
- Biannually for high concentration source-area wells,
- Biannually or annually for intermediate wells, depending on the total number of intermediate wells, and
- Quarterly for clean downgradient wells.

Sampling frequency in all site wells should also be reduced to biannual or annual if contaminant concentrations in all site wells are near or below MCLs.

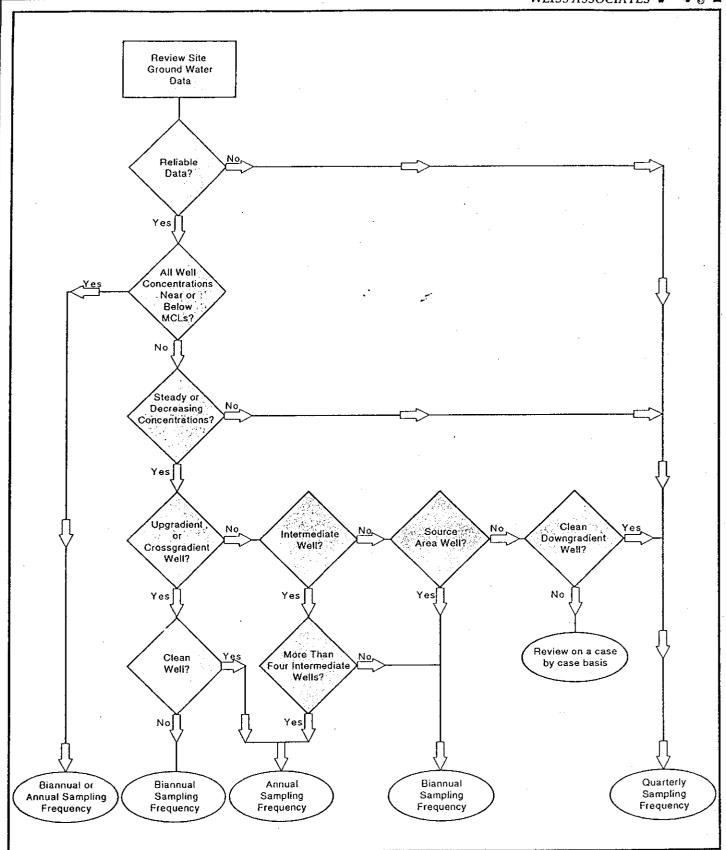


Figure 1. Ground Water Sampling Frequency Determination Chart



December 31, 1993

Mr. Forrest Craig San Rafael Fire Department Hazardous Materials Division 1039 'C' Street San Rafael, California 94901 Chevron U.S.A. Products Company 2410 Camino Ramon San Ramon, CA 94583 P.O. Box 5004 San Ramon, CA 94583-0804

Marketing Department Phone 510 842 9500

Re: Former Chevron Station #9-4553 1722 Fourth Street, San Rafael, California

Dear Mr. Craig:

Enclosed is the latest quarterly groundwater monitoring dated December 20, 1993 prepared by Sierra Environmental Services.

The off-site well No. 8 had a decrease in both TPH-G and BTEX, Monitoring Wells Nos. 9, 10 and 12 remained ND for TPH-G, but showed a trace of BTEX. The remaining off-site wells, Nos. 7 and 11, remained ND for both TPH-G and BTEX.

We will continue to monitor this site on a quarterly basis. Please call (510) 842-9525 if you have any questions.

Very truly yours,

Richard Soennichsen

Project Manager

cc:

Mr. John Jang, San Francisco RWQCB

Mr. Michael Cooke, Weiss Associates Ms. Jane Husman, Planned Parenthood, 20 'H' Street, San Rafael, CA 94901 Ms. Kareen Kawkins, Forsher & Guthrie, 10 "H" Street, San Rafael, CA 94901 825 Arnold Drive, Suite 114 • Martinez, California 94553 • (510) 229-1512 / fax (510) 229-1526

ANALYSIS CERTIFICATE O F

ANALYSIS FOR TOTAL PETROLEUM HYDROCARBONS

Page 2 of QA/QC INFORMATION 30057

NA = ANALYSIS NOT REQUESTED

ND = ANALYSIS NOT DETECTED ABOVE QUANTITATION LIMIT

ug/L = parts per billion (ppb)

OIL AND GREASE ANALYSIS By Standard Methods Method 5520F: Minimum Detection Limit in Water: 5000ug/L

Modified EPA SW-846 Method 8015 for Extractable Hydrocarbons: Minimum Quantitation Limit for Diesel in Water: 50ug/L

EPA SW-846 Method 8015/5030 Total Purgable Petroleum Hydrocarbons: Minimum Quantitation Limit for Gasoline in Water: 50ug/L

EPA SW-846 Method 8020/BTXE Minimum Quantitation Limit in Water: 0.5ug/L

	MS/MSD RECOVERY	RPD	CONTROL LIMIT
ANALYTE			70-130
Gasoline: Benzene:	107/120 112/103	11% 8% 3%	70-130 70-130 70-130
Toluene: Ethyl Benzene: Total Xylenes:	107/104 95/92 105/103	3% 2%	70-130 70-130

Senior Chemist



Superior Precision Analytical, Inc.

825 Arnold Drive, Suite 114 • Martinez, California 94553 • (510) 229-1512 / fax (510) 229-1526

CERTIFICATE OF ANALYSIS

ANALYSIS FOR TOTAL PETROLEUM HYDROCARBONS

Page 2 of 2 QA/QC INFORMATION SET: 30057

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EPA SW-846 Method 8020/BTXE

Minimum Quantitation Limit in Water: 0.5ug/L

ANALYTE	MS/MSD RECOVERY	RPD	CONTROL LIMIT
Gasoline:	107/120	11%	70-130
Benzene:	112/103	88	70-130
Toluene:	107/104	3%	70-130
Ethyl Benzene:	95/92	3%	70-130
Total Xylenes:	105/103	2%	70-130

Senior Chemist