



76 Broadway
Sacramento, CA 95818
phone 916.558.7676
fax 916.558.7639

RECEIVED

MAY 13 2005

ENVIRONMENTAL HEALTH SERVICES

April 28, 2005

Mr. Don Hwang
Alameda County Health Agency
Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

RE: 76 Station #7004
15599 Hesperian Blvd., San Leandro, CA
APN 413-0003-001-03

Dear Mr. Hwang:

In accordance with section 25297.15(a) of Chapter 6.7 of the Health and Safety Code, I, Thomas H. Kosel, ConocoPhillips, certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Brunetti Trust (50% fee title owner)
Wells Fargo Bank, N.A., Brunetti Trust
Attn: Ms. Shelly Eisaman
420 Montgomery Street, 3rd Floor
San Francisco, CA 94104
Represented by
Mr. Alan Guttenberg, Esq.
Guttenberg, Rapson and Colvin LLP
101 Lucas Valley Road, Suite #216
San Rafael, CA 94903
415-507-4525

Mr. Don Hwang
RE: 76 Station #7004
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Page 2 of 2

Kamena Trust and Maionchi Trust (50% fee title owner)

Mr. Gary Ragghiaanti
Ragghianti, Freitas, Macias and Wallace LLP
874 Fourth Street, Suite D
San Rafael, CA 94901

Also represented by
Mr. James R. Arnold
The Arnold Law Practice
225 Bush Street, 16th Floor
San Francisco, CA 94104
415-439-8831

In addition, ConocoPhillips is a successor in interest to Tosco Corporation and other companies and entities that entered into a sublease agreement with Dayton Hudson Corporation (Target). Target has a ground lease for the referenced property with the fee title owners. Tosco (now ConocoPhillips) leased the station property from Target. Target's contact is:

Mr. David Luick
Target Stores
1000 Nicollet Mall, TPN-0725
Minneapolis, MN 55403-9411
612-761-1415

I recommend all of the individuals listed above be copied on correspondence regarding this site.

In accordance with Section 25297.15(a) of the Health and Safety Code, I, Thomas H. Kosel, ConocoPhillips, certify that I have notified all responsible landowners of the enclosed proposed cleanup proposal.

Sincerely,



Thomas H. Kosel
ConocoPhillips
RM&R Site Manager
76 Broadway, Sacramento, CA 95818
916-558-7666



SECOR
INTERNATIONAL
INCORPORATED

www.secor.com

3017 Kilgore Road, Suite 100
Rancho Cordova, CA 95670
916-861-0400 TEL
916-861-0430 FAX

May 12, 2005

RECEIVED

MAY 13 2005

ENVIRONMENTAL HEALTH SERVICES

Mr. Don Hwang
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

RE: **Addendum to October 14, 2004 Work Plan for Additional Off-Site Monitoring Well Installation**
Former 76 Service Station No. 7004
15599 Hesperian Boulevard, San Leandro, CA
SECOR Project No.: 77CP.67004.03.0001

Dear Mr. Hwang:

SECOR International Incorporated (SECOR) is pleased to submit this Addendum to the October 14, 2004 Work Plan for Additional Off-Site Monitoring Well Installation to the Alameda County Department of Environmental Health (ACDEH) on behalf of ConocoPhillips, to further investigate subsurface conditions beneath Former 76 Service Station No. 7004, located at 15599 Hesperian Boulevard, San Leandro, California (Figure 1). This work plan was prepared in accordance with the ACDEH letter dated February 16, 2005 (Attachment 1). The results of the proposed investigation will help determine appropriate locations and screening intervals for future monitoring wells (if merited). This Workplan also proposes interim remediation.

INTRODUCTION

Redevelopment of the site is scheduled to commence in October 2006. At that time, Walmart will begin a long-term lease, restaurant construction is planned near the area of contamination, and the existing Kragen Auto Parts building may be demolished. The immediate goal is to conduct expedited assessment and interim remediation during the summer and fall of 2005 followed by post-remediation monitoring and any other tasks as necessary to achieve case closure or minimize disruption to the site due to environmental conditions by October 2006. This workplan presents a detailed project schedule and requests a meeting between involved parties and key ACDEH staff. Rapid approval of this workplan will help us achieve the project goals and could avoid the need for a meeting. The meeting could include representatives from any or all of the following involved parties: ConocoPhillips, Walmart, Target (who leased the site to ConocoPhillips), Inn-n-out Burger, wells Fargo Private Client Services, the Kamena Trust, The Maionchi Trust, the Freschi Trust, SECOR, and Pangea.

BACKGROUND

The site is located at the northwest corner of Hesperian Boulevard and East Lewelling Boulevard, in San Leandro, California. The site is a former 76 Service Station which was demolished in May of 2000. At that time subsurface tanks, piping and aboveground



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May 12, 2005

Mr. Don Hwang
Alameda County Health Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Re: **Document Transmittal**
Fuel Leak Case
76 Station #7004
15599 Hesperian Blvd.
San Leandro, CA

Alameda County
May 18 2005
Environmental Health

Dear Mr. Hwang:

Please find attached *my letter to Alameda County, dated April 28, 2005, and Secor's Addendum to October 14, 2004 Work Plan for Additional Off-Site Monitoring Well Installation, dated 5/12/05* for the above referenced site. I declare, under penalty of perjury, that to the best of my knowledge the information and/or recommendations contained in the attached proposal or report are true and correct.

If you have any questions or need additional information, please call me at (916) 558-7666.

Sincerely,

Thomas H. Kosel
Site Manger, Risk Management and Remediation
ConocoPhillips
76 Broadway, Sacramento, CA 95818

Attachment

cc: Tom Potter, Secor

Mr. Don Hwang
May 12, 2005
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components were removed. The site is currently a paved parking lot within a Target department store complex, and is situated adjacent to a former Kragan Auto Parts store, which is currently vacant.

PREVIOUS INVESTIGATIONS

In October, 1990, Kaprealian Engineering, Inc (Kaprealian) observed the removal of three underground storage tanks (USTs) and removal and replacement of product piping at the site. The tanks included one [steel] 12,000-gallon super unleaded fuel tank and two [steel] 12,000-gallon regular unleaded fuel tanks. No holes or cracks were observed in the tanks. 14 confirmation soil samples were collected from the tank pit and analyzed for total petroleum hydrocarbons as gasoline (TPHg), and benzene, toluene, ethylbenzene, and xylenes (BTEX). Soil samples collected from the final tank excavation contained up to 30 milligrams per kilogram (mg/kg) TPHg and 0.054 mg/kg benzene. Toluene, ethylbenzene, and xylenes were also detected. A water sample collected from the tank pit contained 4,300 parts per billion (ppb) TPHg and 40 ppb benzene. Samples collected from the final pipeline trenches contained up to 20 mg/kg TPHg and 0.057 mg/kg benzene, as well as toluene, ethylbenzene, and xylenes.

In April and June, 1991 KEI supervised the installation of six 2-inch diameter monitoring wells (MW1 through MW6). The wells were completed to 25 to 26 feet below ground surface (bgs). Selected soil samples and grab groundwater samples from each well were analyzed for TPHg and BTEX. Soil samples contained up to 4,800 parts per million (ppm) TPHg and 23 ppm benzene (17.5 feet bgs in MW3). Toluene, ethylbenzene, and xylenes were also detected. Post development groundwater samples from these wells contained up to 34,000 ppb TPHg and 6,100 ppb benzene (MW3).

In May, 1992 KEI installed a 6-inch diameter aquifer test well (RW-1) and conducted an Aquifer test using RW-1 for extraction and MW-2, MW3, MW4, and MW5 for observation. Aquifer parameters determined from the test (via the Theis method) for RW1 were as follows:

- Transmissivity (confined): 35 ft²/day
- Storativity (confined): 6.3E⁻⁶
- Conductivity (confined): 0.3 ft/day

Oxygen releasing compound was placed in MW-5 in 1999. Oxygen releasing compound (360 pounds) was also placed in the bottom of the UST pit during tank removal in 2000. There is no current active remediation.

In May, 2000, Gettler-Ryan observed the removal of two 12,000-gallon, double-walled glasteel USTs and fiberglass product piping and dispensers at the site. At this time Station-related structures were also demolished and removed. Four soil samples were collected from the tank pit excavation, and four were collected from the pipeline trenches. The

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samples were analyzed for TPHg, BTEX and methyl tertiary butyl ether (MtBE). Tank pit samples contained up to 350 ppm TPHg, 4.8 ppm ethylbenzene, and 0.81 ppm xylenes, but were non-detectable for benzene and MtBE. Pipeline trench samples were non-detectable for the analytes.

In November, 2001, SECOR conducted a 5 day dual phase extraction (DPE) test at the site. The test utilized MW-3 and RW-1 for extraction. During the test, applied vacuum was approximately 25 inches of mercury, vapor extraction flow rates ranged from approximately 22 to 155 cubic feet per minute, and groundwater extraction flow rates ranged from 0.05 to 0.5 gallons per minute. Influent vapor concentrations dropped from a high of 5,200 parts per million by volume (ppmv) TPHg at the start of the test to 440 ppmv TPHg at the end of test. Based on the data collected during the test, approximately 36.55 pounds of vapor phase TPHg, 0.56 pounds of vapor phase benzene, and 0.47 pounds of vapor phase MtBE were removed from the subsurface. The radius of influence was estimated at 15 to 55 feet for MW-3 and 48 to 85 feet for RW-1.

In September, 2002, Gettler-Ryan drilled and sampled five direct push soil borings (GP-1 through GP-5) in the vicinity of the Kragen Auto Parts building and the former USTs. Soil and groundwater samples were collected from each boring and analyzed for TPHg, BTEX, and fuel oxygenates. Soil samples were below detection for the analytes, except for sample GP-3 @13.5 feet which contained 0.051 mg/kg MtBE and 0.083 mg/kg tertiary butyl alcohol. Groundwater samples contained 22 to 96,000 ppb TPHg, and 0.47 to 360 ppb MtBE. Ethylbenzene and TBA were also detected.

The site has been monitored and sampled since the 2nd quarter, 1991. Between 1991 and 1995, monitoring was conducted quarterly. Between 1996 and 2001, the site was monitored semiannually. From January, 2002 to July, 2003 the site was monitored monthly. Currently, seven well (MW-1 through MW-6 and RW-1) are sampled quarterly. Samples are analyzed for total purgable petroleum hydrocarbons (TPPH), BTEX, and fuel oxygenates. A summary of groundwater data is shown in Table 1, and presented in a rose diagram in Figure 3. Fourth Quarter monitoring data is included in Attachment 4.

PROPOSED SCOPE OF WORK

The scope of work for this site assessment will include a the drilling of Twenty Geoprobe[®] borings in the area of the existing USTs and at the locations shown on Figure 1 to delineate the vertical and lateral extent of hydrocarbon impacts in soil and groundwater from the site. Additionally, a preferential pathway survey was conducted to determine the likelihood or lack thereof of underground utilities that may act as a pathway for contaminated groundwater to move freely off-site. Utility locations are presented on Figure 2 and Attachment 3. During the course of drilling, additional borings may be warranted for lateral definition should field observations identify additional impacted areas. Additionally, a mobile dual phase extraction (DPE) unit will be placed on site to extract from MW-3, MW-5 and RW-1 as an interim remedial action to reduce the soil and water impacts focused

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around MW-3, MW-5 and RW-1 until more data is available to address alternative remedial actions that may be warranted.

The specific scope of work is discussed below:

Site Safety Plan. As required by the Occupational Health and Safety Administration (OSHA) Standard "Hazardous Waste Operations and Emergency Response" guidelines (29 CFR 1910.120), and by the California Occupational Health and Safety Administration (Cal-OSHA) "Hazardous Waste Operations and Emergency Response" guidelines (CCR Title 8, Section 5192), a Health and Safety Plan (HASP) will be prepared. The HASP will be reviewed by the field staff and contractors before beginning field operations at the site.

Permitting. Soil boring permits will be obtained from the Alameda County Department of Environmental Health (ACDEH) prior to initiating work. An air discharge permit will be obtained from the Bay Area Air Quality Management District (BAAQMD) for the mobile DPE unit.

USA and Notification. Prior to drilling, SECOR will mark the locations of the soil borings and use a private utility locator to clear the locations. Underground Service Alert (USA) will be called to allow the local underground utility companies to identify the locations of any utilities in the area of the proposed work.

Geoprobe® Borings. Twenty Geoprobe® soil borings will be advanced at the locations shown on Figure 1. Nine Geoprobe® borings will be advanced to a depth of approximately 20 feet below ground surface (bgs) for lateral definition of groundwater. The borings will allow evaluation of soil lithology and facilitate sampling of first encountered groundwater and deeper silty sand units, which have been first encountered at depths of approximately 16 to 20 feet bgs. Eleven Geoprobe® borings will be advanced around the former tank pit and dispenser islands to establish vertical and lateral definition of soil to a total depth to be determined based on field screening of soil samples collected at each change in lithology or until two consecutive subjectively "clean" samples collected at 5-foot intervals are encountered beneath the impacted soil zone. The target impacted zone starts at approximately 13 feet bgs to a depth to be determined based on field observations, but will extend to at least 25 feet in depth in the area of MW-3.

Sample Selection and Analysis. Soil encountered will be logged by a SECOR geologist under the direction of a State of California Registered Geologist. Soil samples will also be screened in the field for the presence of volatile organic compounds (VOCs) using a photoionization detector (PID). Soil samples will be selected for chemical analysis based on visual observations, odors and PID readings. Selected soil samples will be analyzed for total petroleum hydrocarbons calculated as gasoline (TPHg), benzene, toluene, ethylbenzene, xylenes (BTEX compounds), fuel oxygenates methyl tert-butyl ether (MtBE), ethyl tert-butyl ether (EtBE), tert-Amyl methyl ether (TAME), tert-butyl ether (TBA), di-isopropyl ether (DIPE), ethylene dibromide (EDB), di-chloroethane (1,2-DCA), and ethanol

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by EPA Method 8260, single run, and total lead by EPA Method 6010. At a minimum, three soil samples per borehole will be analyzed for the above constituents. Field and laboratory procedures are presented as Attachment 2.

Grab groundwater Samples. Groundwater will be sampled in the borings using either a HydroPunch® sampling apparatus or by lowering a clean disposable bailer through the Geoprobe® rods and retrieving a sample of the formation water. Groundwater is anticipated to be at 12.21 to 13.70 feet below ground surface (bgs). Historical groundwater ranged from 11.25 to 16.71 feet bgs. Groundwater samples will be collected and decanted directly from bailers into laboratory supplied glassware. Samples will be sent under chain-of-custody procedures to a California State-certified laboratory. Select grab groundwater samples will be analyzed for TPHg, BTEX, and fuel oxygenates by EPA Method 8260B.

Borehole Abandonment. Each soil boring will be backfilled from the bottom up with cement grout. The grout will be placed in the borehole through the Geoprobe® rods as they are being retracted. The boring will be filled to surface with cement to match the existing grade.

Soil and Water Disposal. Soil cuttings and rinsate water generated during drilling operations will be temporarily stored onsite in DOT-approved 55-gallon pending characterization and disposal. Soil cuttings and rinsate water will be removed by a licensed disposal contractor and will be transported to an appropriate disposal facility. Drums will be stored in a secure location on the site. Water generated from the mobile DPE unit will be either temporarily stored in a 6,900 to 22,000 gallon Baker tank and removed on an as needed basis by a licensed disposal contractor to an appropriate disposal and treatment facility or discharged to the sanitary sewer under a POTW permit if available.

Well Installation. Based on the future analytical results, SECOR will prepare, if warranted, an unsolicited workplan for the installation of off-site monitoring wells. These wells could possibly be screened at depths to provide optimization for monitoring and sampling along with future DPE. These well could be installed prior to the startup of the DPE system.

Dual Phase Extraction. The goal of the interim remediation project is removal of petroleum hydrocarbons absorbed to soil and dissolved in groundwater. DPE will directly remove petroleum hydrocarbons from unsaturated and smear zone soil and will remove groundwater impacted by petroleum hydrocarbons in the area of highest dissolved phase concentration. The result of the DPE pilot test, conducted in November 2001, indicated that DPE would effectively remediate the site in a cost-effective manner, potentially minimize the need for additional assessment and reduce the overall lifecycle project costs.

Prior to conducting DPE, SECOR will obtain the necessary permits from the Bay Area Air Quality Management District (BAAQMD). DPE will be conducted using SECOR's mobile treatment system (MTS). The MTS consists of a 350 standard cubic foot per minute (scfm)

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liquid-ring blower, a 100-gallon liquid/vapor separator, a 50 gallon per minute (gpm) liquid transfer pump, and a 300 scfm thermal/catalytic oxidizer to abate petroleum hydrocarbon vapors prior to discharge to the atmosphere.

Using the MTS, SECOR will conduct DPE utilizing wells RW-1, MW-3 and MW-5 for extraction. The MTS will be deployed at the site accompanied by a trailer mounted propane tank, a generator, and a fluid storage tank. The equipment will be set up inside security fencing to limit access to the MTS. A 1"-diameter groundwater extraction pipe will be placed at or below the groundwater surface in the extraction wells (MW-3, MW-5 and RW-1) and conveyance piping will be used to connect the extraction wells and fluid holding tank to the influent and effluent ports, respectively, on the MTS unit. The MTS will then be started and inspected for proper operation prior to DPE.

DPE will commence when a vacuum is applied to RW-1, MW-3 and MW-5. During initial startup, measurements including influent hydrocarbon concentrations (using a PID), soil vapor and water flow rates and induced vacuums will be collected at regular intervals and recorded. Additionally, if warranted, DPE could be used on future select wells installed after the proposed borings.

Vapor samples will be collected in Tedlar bags, initially (i.e., within two hours of system start-up) and at approximate 1 week intervals thereafter from the influent and effluent soil vapor sample port on the MTS unit. Water samples will be collected from the influent and effluent ports on the unit's vapor/liquid separator. Air and water sample analytical data will be used to calculate mass removal rates and total mass removed as a result of vapor and groundwater extraction. A sample of the liquid in the fluid storage tank will also be collected for use in profiling liquid wastes and evaluating disposal options.

Air and water samples will be submitted to a California State-certified laboratory and analyzed for the presence of TPHg, BTEX, and MtBE by EPA Method 8260B.

SECOR anticipates that the DPE be conducted for an approximate duration of two to three months. Monthly compliance reports

REPORT. Following the completion on-site activities, SECOR will submit a report documenting the findings of the Geoprobe® investigation and include recommendations for the installation of wells, if merited. The wells would enhance DPE efforts in the source area and near MW-5, and delineate the MtBE extent downgradient of MW-5. Any well locations in the southwestern downgradient direction will be selected to minimize disruption to future site occupants. The report would present an accelerated schedule to allow well installation before or concurrent to DPE efforts. The report will also include soil boring logs, soil and groundwater analytical results, chain-of-custody documentation, and conclusions/recommendations.

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DISCUSSION

During a recent site visit on March 18, 2005, SECOR conducted a preferential pathway survey by hiring Cruz Brothers an underground utility locating contractor. During the course of work, Cruz Brothers looked for electrical (main power and misc. power lines), sewer, water, communication and gas utilities that may be present underground at the site. Additionally, SECOR visited the City of San Leandro's Engineering Department, County of Alameda, and the Orcaloma Sanitary District's Engineering Department to view maps of underground utilities that may also act as preferential pathways and contacted East Bay Municipal Utility District (EBMUD) to determine the location and depth or lack thereof of the main water supply.

Underground utilities located on the property identified were power (main and misc.) at estimated depths ranging from two to three feet below ground surface (bgs), sewer lateral at an estimated depth of four feet bgs, communication at an estimated depth of 30 inches bgs; water lines were also identified but depths were undetermined. East Bay Municipal Utility District (EBMUD) was contacted via telephone to determine the location and depth of the main water lines located along Hesperian Boulevard. According to EBMUD, two water mains are identified along the east side of Hesperian Boulevard; however, they did not reveal the depths of the main water lines. Sewer and storm water mains were identified along the eastern side of Hesperian Blvd. Depths measured in the field identified the sewer main to be at a depth of approximately six feet bgs, and the storm water main was identified at approximately seven feet bgs.

A review of the most recent quarterly and monitoring report and a historical review over the last five years, depth to water averages approximately 13.71 feet below ground surface. Based on the depth to water and the historical groundwater gradients, it is unlikely that the identified utilities and associated utility trenches act as a preferential pathway.

SCHEDULE

SECOR is prepared to initiate soil boring field activities for upon approval of this Work Plan by the ACDEH. Below are timelines that SECOR would like to achieve:

1. Start air permitting ASAP prior to workplan approval.
2. Final ACDEH comments and workplan approval by June 3, 2005
3. Perform borings by June 30, 2005
4. Assessment report to ACDEH by July 31, 2005
5. Install source area wells (if merited to enhance remediation by August 31, 2005). Also install any merited downgradient wells at this time.
6. Begin DPE interim remediation by September 15, 2005. Anticipate two to three months DPE.
7. Submit interim remediation report by January 15, 2006.

Mr. Don Hwang
May 12, 2005
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Additionally SECOR is prepared to initiate DPE upon approval of this Work Plan. SECOR anticipates that it will require approximately three to four months for the issuance of the permit to operate from the BAAQMD. Once permits are received, the mobile DPE unit will be scheduled and placed for operations.

Should you have any questions or concerns regarding these activities, please feel free to contact the undersigned at (916) 861-0400.

Sincerely,
SECOR International Incorporated



Thomas M. Potter
Staff Scientist

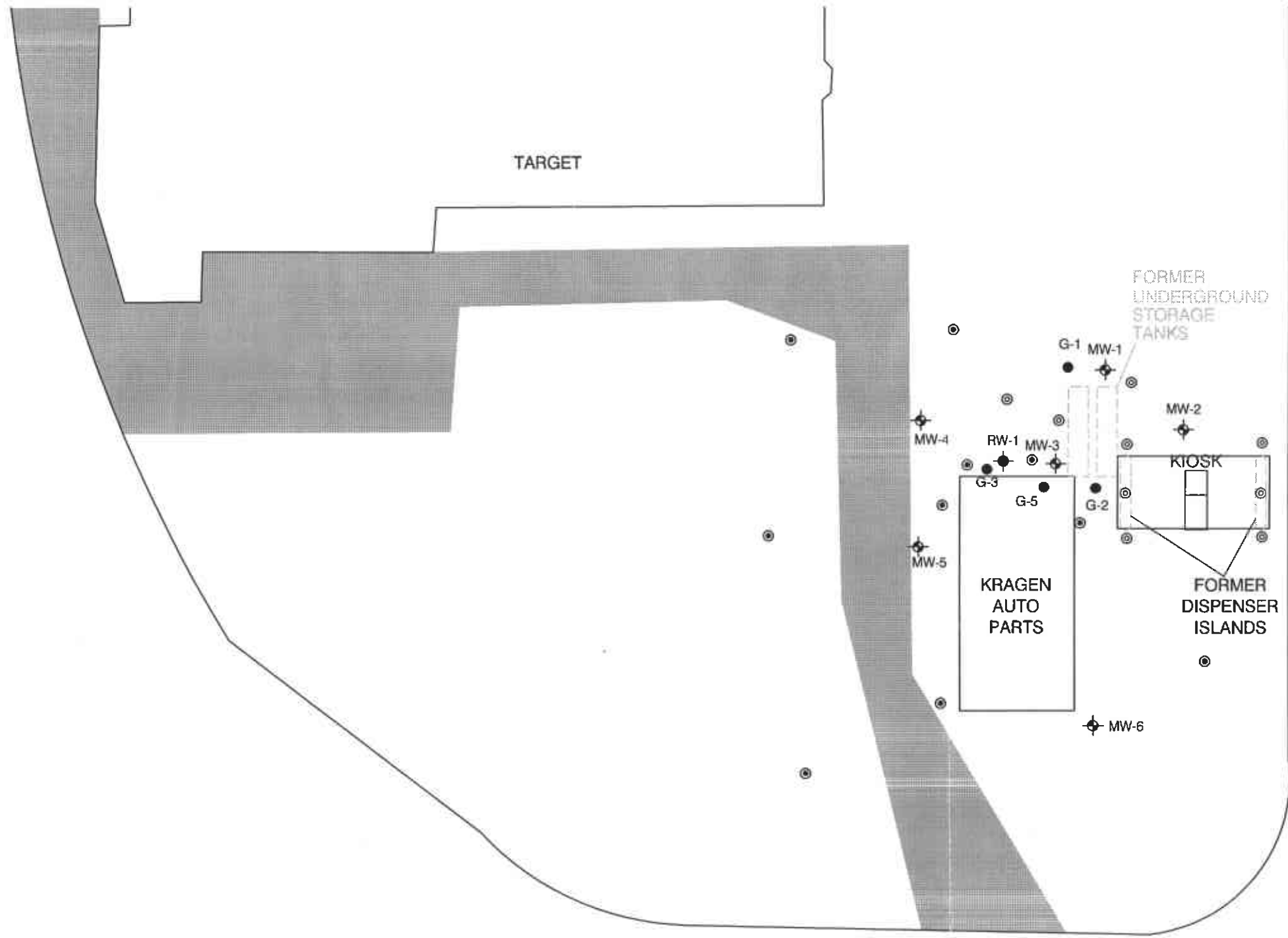


Rusty Benkosky
Principal Engineer



- Figure 1 – Site Map with Proposed Soil Boring Locations
- Figure 2 – Site Map with Utility Locations
- Figure 3 – Rose Diagram
- Figure 4 – Generalized Geologic Cross-Section A-A'
- Figure 5 – Generalized Geologic Cross-Section B-B'
- Table 1 - Groundwater Gradient and Flow Direction
- Attachment 1 – February 16, 2005 letter from Alameda County Department of Environmental Health
- Attachment 2 – Field and Laboratory Procedures
- Attachment 3 – Utility Maps (City Storm Drain Map and Sanitary District Map).
- Attachment 4 – Historical Analytical Data

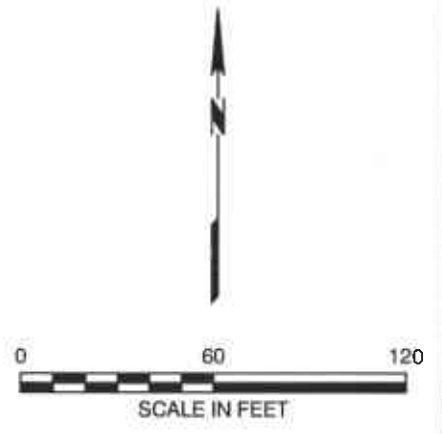
cc: Mr. Thomas Kosel, ConocoPhillips
Mr. David Luick, Target Corporation, 1000 Nicollet Mall, TPN – 0725 Minneapolis, MN 55403-9411
Mr. Alan Guttenberg, Guttenberg, Rapson and Colvin LLP, 101 Lucas Valley Road Suite 216, San Rafael, CA 94903
Gary Raghianti, Raghianti Freitas LLP, 874 Fourth Street, Suite D, San Rafael CA 94901
Ms. Shelly Eisaman, Wells Fargo Bank, N.A., Brunetti Trust, 420 Montgomery Street, 3rd Fl., San Francisco, CA 94104



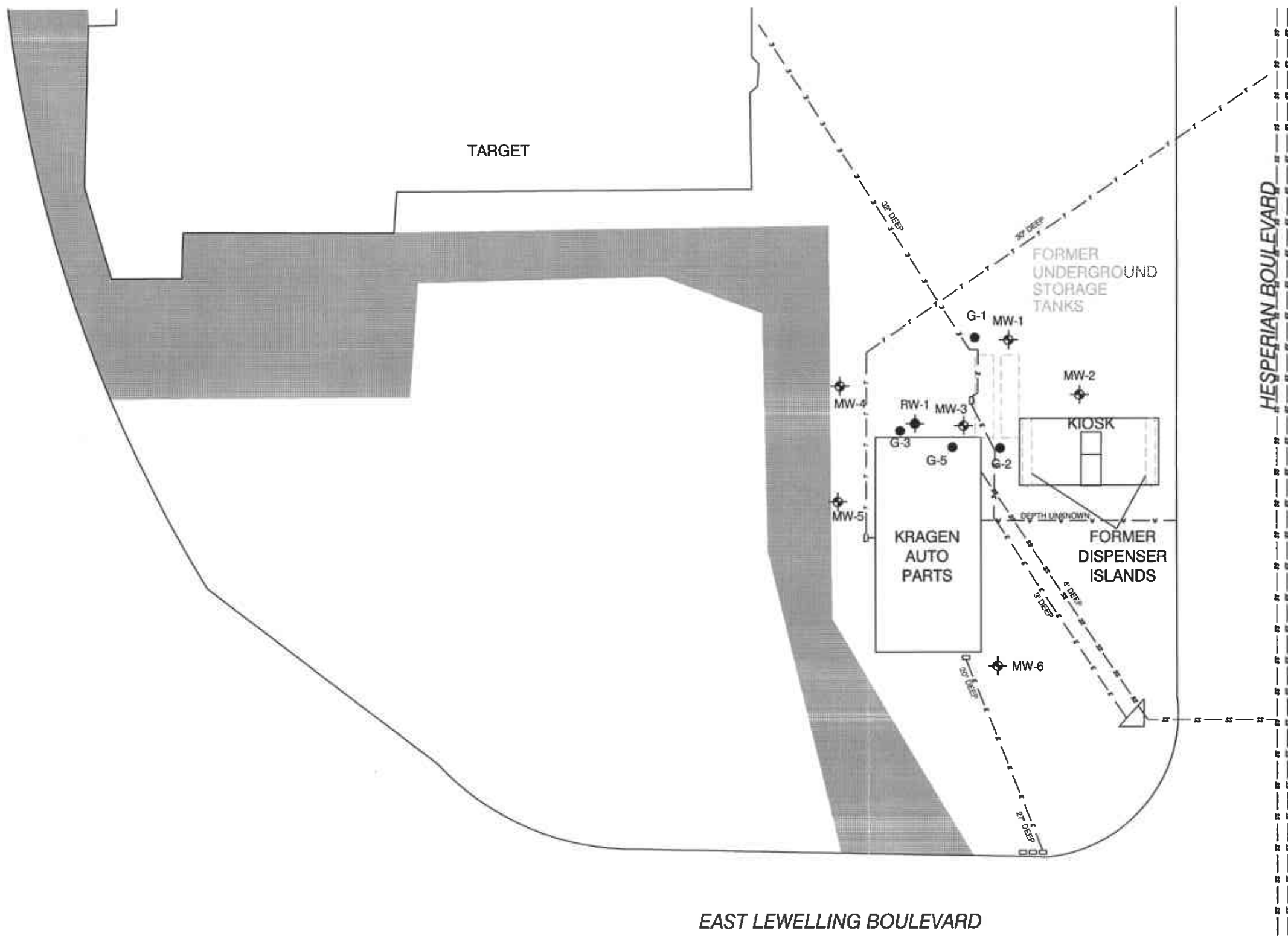
- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - ⊙ AQUIFER TESTING WELL
 - ⊙ PROPOSED SOIL BORINGS
 - ⊙ PROPOSED SOIL BORINGS WITH WATER SAMPLES
 - ▨ HEAVY DUTY PAVEMENT

HESPERIAN BOULEVARD

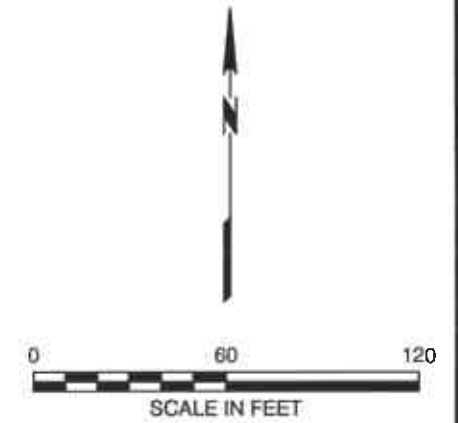
EAST LEWELLING BOULEVARD



DRAWN BY: PR CHECKED: TP APPROVED: TP DATE: 5/3/05 DWR JOB NO.: 77CP.67004.03 CAD FILE: EXTENDED	PREPARED BY:  SECOR 3017 KILGORE ROAD, SUITE 100 RANCHO CORDOVA, CA 95670	PREPARED FOR: CONOCOPHILLIPS FORMER 76 SERVICE STATION #7004 15599 HESPERIAN BOULEVARD SAN LEANDRO, CALIFORNIA	FIGURE 1 SITE MAP WITH PROPOSED SOIL BORING LOCATIONS
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- LEGEND:**
- GROUNDWATER MONITORING WELL
 - AQUIFER TESTING WELL
 - TELEPHONE LINE
 - ELECTRIC POWER LINE
 - SANITARY SEWER LINE (6 FEET bgs)
 - STORM DRAIN LINE (7 FEET bgs)
 - WATER LINE
 - HEAVY DUTY PAVEMENT

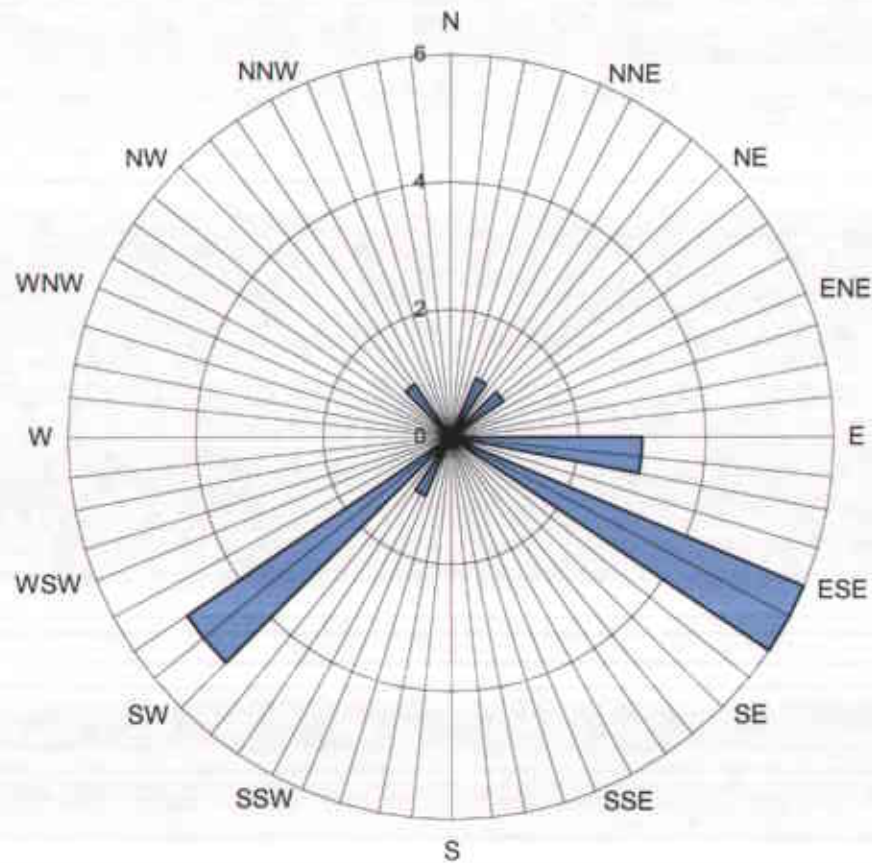


EAST LEWELLING BOULEVARD

HESPERIAN BOULEVARD

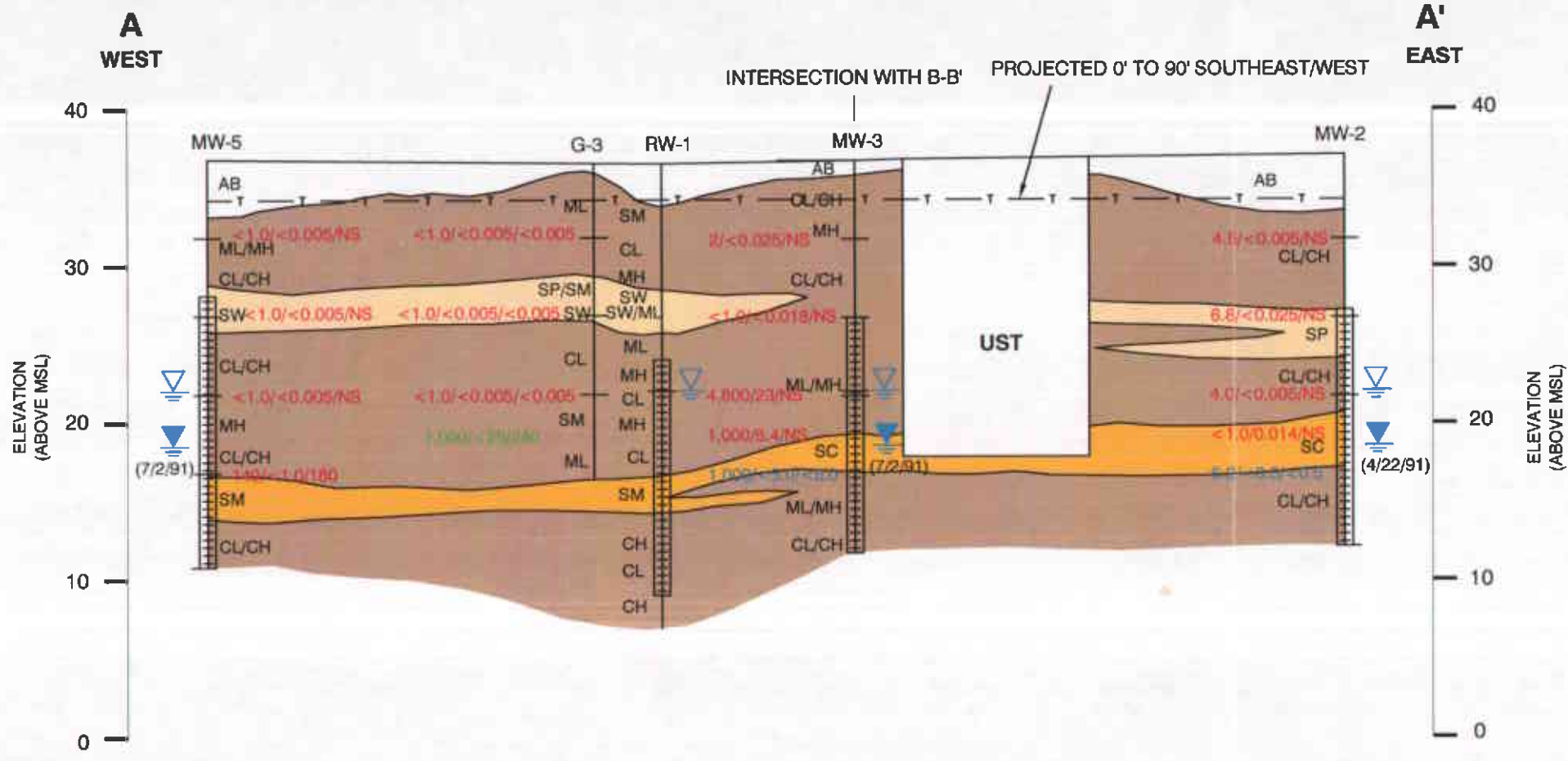
DRAWN BY: PR CHECKED: TP APPROVED: TP DATE: 5/3/05 DWR JOB NO.: 77CP.67004.03 CAD FILE: EXTENDED	PREPARED BY: SECOR 3017 KILGORE ROAD, SUITE 100 RANCHO CORDOVA, CA 95670	PREPARED FOR: CONOCOPHILLIPS FORMER 76 SERVICE STATION #7004 15599 HESPERIAN BOULEVARD SAN LEANDRO, CALIFORNIA	FIGURE 2 SITE MAP WITH UTILITY LOCATIONS
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Figure 3
Groundwater Flow Direction Rose Diagram
Former 76 Station #7004
15599 Hesperian Boulevard, San Leandro, California



■ Groundwater Flow Direction

Legend
 Concentric Circles represent
 Quarterly Monitoring Events
 First Quarter 1999 through First
 Quarter 2005
 18 Data Points Shown

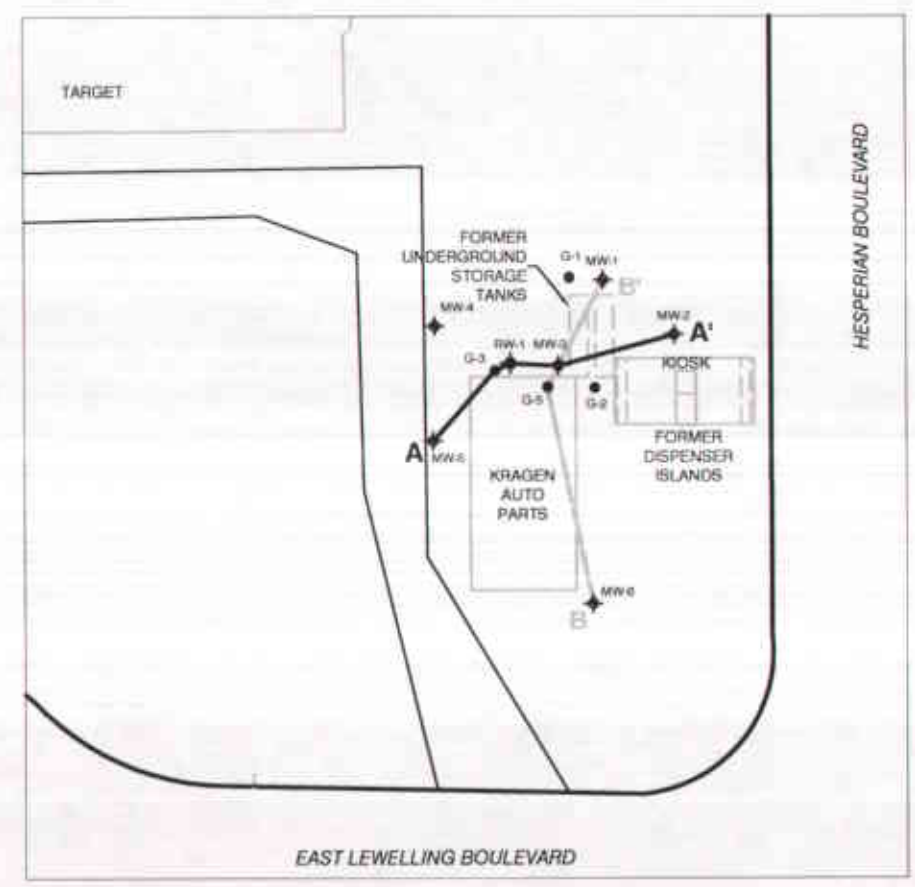
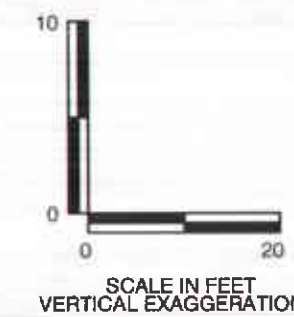


- LEGEND:**
- T — TELEPHONE LINE
 - INTERPRETED SOIL STRATIGRAPHIC BOUNDARY
 - | | |
|-----------------------------------|-------------------------|
| <math><10/<1/<0.005/<0.005</math> | SOIL SAMPLE |
| | TPHg/BENZENE/MIBE |
| | IN mg/kg |
| $NA/2,400/8.9/2.5$ | WATER SAMPLE |
| | TPHg/BENZENE/MIBE |
| | IN ppb |
| <math>1,000/<25/240</math> | GRAB GROUNDWATER SAMPLE |
| | TPHg/BENZENE/MIBE |
| | IN ppb |

- | | |
|--|--|
| | SCREENED INTERVAL FOR MONITORING WELLS |
|--|--|
- LPH LIQUID PHASE HYDROCARBONS
- TPHd TOTAL PETROLEUM HYDROCARBONS AS DIESEL
- TPHg TOTAL PETROLEUM HYDROCARBONS AS GASOLINE
- MIBE METHYL TERT-BUTYL ETHER
- ND NOT DETECTED ABOVE LABORATORY DETECTION LIMITS
- NA NOT ANALYZED
- MSL MEAN SEA LEVEL
- AB AGGREGATE BASE ROCK

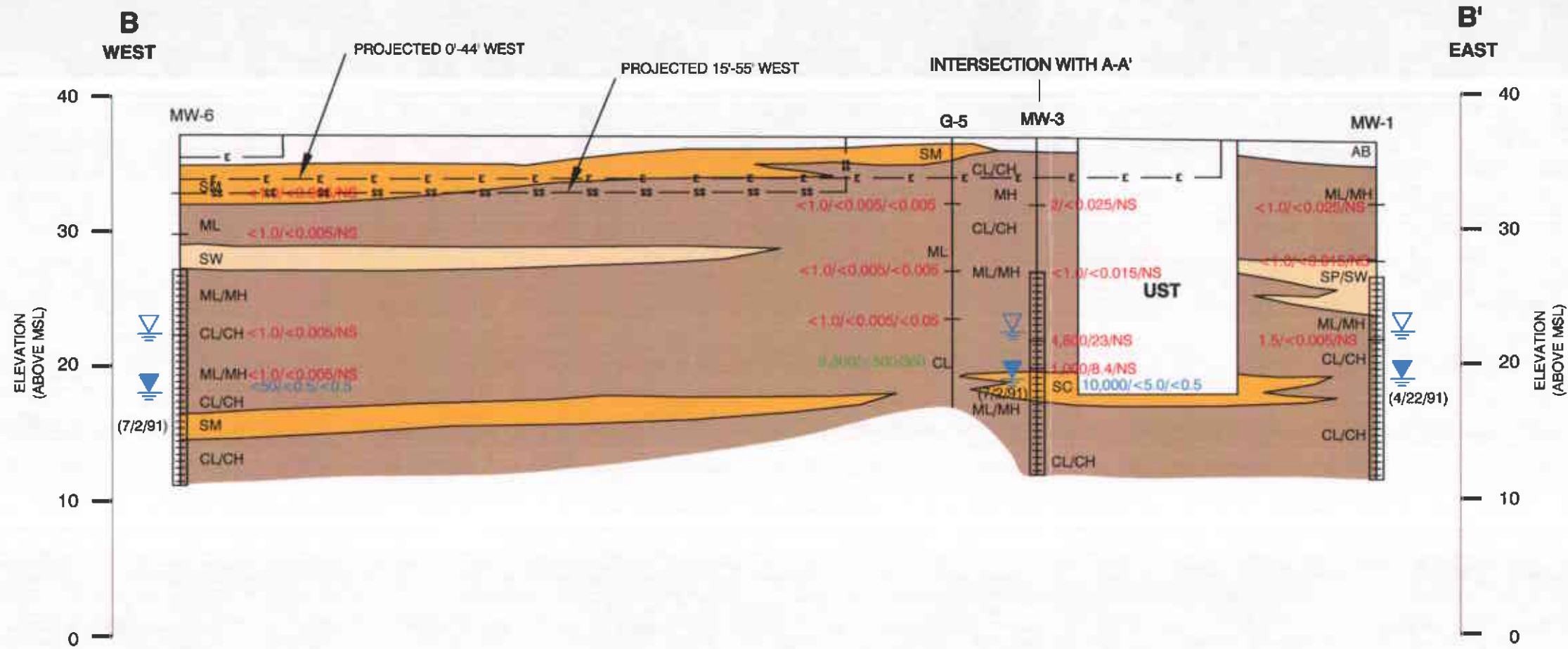
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|--|---|
| | CLAY AND SILT (CL, ML) |
| | SILTY SAND AND CLAYEY SAND (SM, SC, GM, GC) |
| | SAND (SW, SP, GW, GP) |

- | | |
|---|--|
| ▽ | DEPTH TO FIRST WATER (DURING DRILLING) |
| ▽ | DEPTH TO STATIC WATER (DATE) |

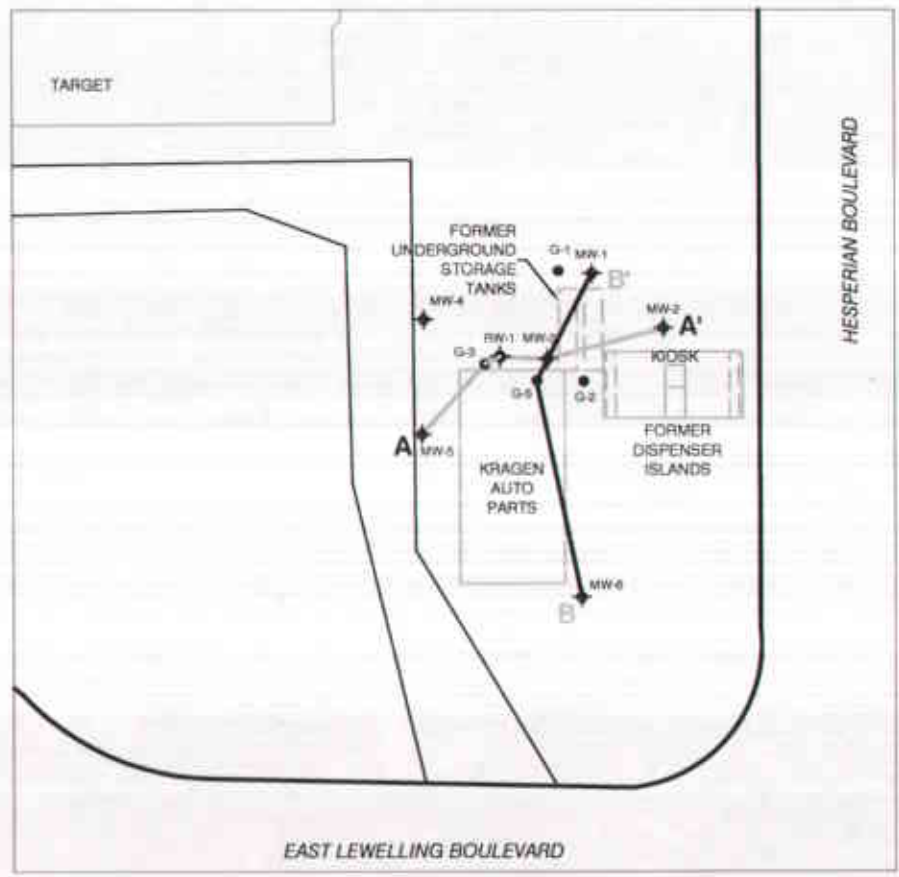
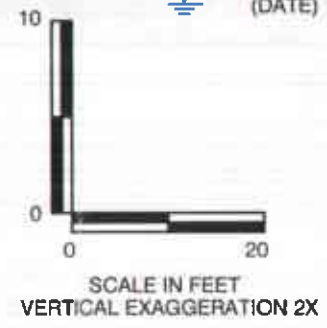


CROSS-SECTION LOCATION MAP (1" = 100')

 3017 KILGORE ROAD, SUITE 100 RANCHO CORDOVA, CALIFORNIA PHONE: (916) 861-0400/(916) 861-0430 (FAX)	FOR: CONOCOPHILLIPS FORMER 76 SERVICE STATION #7004	GENERALIZED GEOLOGIC CROSS-SECTION A-A'		FIGURE: 4
	JOB NUMBER: 77CP.7004.03	DRAWN BY: RT	CHECKED BY: TN	APPROVED BY: TP



- LEGEND:**
- ss — SEWER LINE
 - E — ELECTRIC LINE
 - INTERPRETED SOIL STRATIGRAPHIC BOUNDARY
 - <10/<1/<0.005/0.005 SOIL SAMPLE TPHg/BENZENE/MIBE IN mg/kg
 - NA/2,400/8.9/2.5 WATER SAMPLE TPHg/BENZENE/MIBE IN ppb
 - 9,300/<500/360 GRAP GROUNDWATER SAMPLE TPHg/BENZENE/MIBE IN ppb
 - SCREENED INTERVAL FOR MONITORING WELLS
 - LPH LIQUID PHASE HYDROCARBONS
 - TPHd TOTAL PETROLEUM HYDROCARBONS AS DIESEL
 - TPHg TOTAL PETROLEUM HYDROCARBONS AS GASOLINE
 - MIBE METHYL TERT-BUTYL ETHER
 - ND NOT DETECTED ABOVE LABORATORY DETECTION LIMITS
 - NA NOT ANALYZED
 - MSL MEAN SEA LEVEL
 - AB AGGREGATE BASE ROCK
 - CLAY AND SILT (CL,ML)
 - SILTY SAND AND CLAYEY SAND (SM,SC)
 - SAND (SW,SP)
 - DEPTH TO FIRST WATER (DURING DRILLING)
 - DEPTH TO STATIC WATER (DATE)



CROSS-SECTION LOCATION MAP (1" = 100')

 SECOR 3017 KILGORE ROAD, SUITE 100 RANCHO CORDOVA, CALIFORNIA PHONE: (916) 861-0400/861-0430 (FAX)	FOR: CONOCOPHILLIPS FORMER 76 SERVICE STATION #7004 15599 HESPERIAN BOULEVARD SAN LEANDRO, CALIFORNIA	GENERALIZED GEOLOGIC CROSS-SECTION B-B'		FIGURE: 5
	JOB NUMBER: 77CP.7004.03	DRAWN BY: RT	CHECKED BY: TN	APPROVED BY: TP

FILEPATH:Q:\CADD-77\ConocoPhillips\7004\CP-7004.XSBB.dwg | Layout Tab: Layout1 | Drafter: droy | Apr 28, 2005 at 15:05

ATTACHMENT 1
February 16, 2005 Letter From Alameda County Department of
Environmental Health
Former 76 Service Station No. 7004
15599 Hesperian Boulevard
San Leandro, CA

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



 **COPY**

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 16, 2005

Thomas H. Kosel, Site Manager, Risk Management and Remediation
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Dear Mr. Kosel,

Subject: Fuel Leak Case No. R00000371, Unocal Service Station No. 7004,
15599 Hesperian Boulevard, San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan for Workplan for Additional Off-Site Monitoring Well Installation Limited Subsurface Investigation" dated October 14, 2004, prepared by SECOR International Incorporated. We disapprove the Work Plan. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Groundwater Monitoring Wells - We do not agree with the proposed monitoring wells. We feel that it would be premature to install more monitoring wells without additional groundwater sampling to determine the location of the plume for optimal well locations. Please submit a Work Plan for groundwater sampling, which will determine the optimal locations for additional monitoring wells.
- 2) Preferential Pathway Survey - We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site.
 - a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan requested below.

RECEIVED
FEB 21 2005

BY:.....

- 3) Historical Hydraulic Gradients – Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site. Please submit with the Work Plan requested below.
- 4) Source Characterization – 1,000 mg/kg TPHg, and 8.4 mg/kg benzene were detected in the deepest soil sample collected from MW-3, at 17.5 ft. below ground surface (bgs). Please propose soil sampling to define the vertical extent of soil contamination in the Work Plan requested below.
- 5) Proposed Monitoring Well Screen Length - The monitoring well screen lengths proposed are 15 feet. We request that your monitoring network be depth discrete, generally, screened intervals of 3 to 5 feet in length.
- 6) Proposed Soil Samples from Borings – Sample at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination, instead of at the 5 ft. intervals proposed.

OTHER COMMENTS

- 7) Landowner Notification Requirement - Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee titleholders to the site.

At this time we require that you submit an updated mailing list of all record fee title owners of the site, which states, at a minimum, the following:

A. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:*

- OR -

B. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee titleholders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):

cleanup proposal (Corrective Action Plan)

request for case closure

local agency intention to make a determination that no further action is required

local agency intention to issue a closure letter

- OR -

B. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

April 16, 2005 - Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release

Mr. Kosel
February 16, 2005
Page 4 of 4

from a petroleum UST system, and require your compliance with this request.

OTHER REPORT REQUEST

April 16, 2005 - List of Record Fee Title Owners

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: M. Gavan Heinrich, SECOR International Incorporated, 3017 Kilgore Rd.,
Rancho Cordova, CA 95670

Alan Guttenberg, Esq., Guttenberg, Rapson & Colvin LLP,
101 Lucas Valley Rd. #216, San Rafael, CA 94903

Gary Ragghianti, Esq., Ragghianti Freitas et al., 874 Fourth Street, Ste. D,
San Rafael, CA 94901-3246

Donna Drogos
File

ATTACHMENT 2
Field and Laboratory Procedures
Former 76 Service Station No. 7004
15599 Hesperian Boulevard
San Leandro, CA

ATTACHMENT 2

FIELD AND LABORATORY PROCEDURES

EXPLORATORY DRILLING

Soil borings will be drilled to maximum depth of 20 feet bgs for water lateral definition and to a maximum depth of at least 25 bgs for vertical definition near MW-3 using direct push drilling equipment (first groundwater is expected to be at approximately 13 feet bgs). Selected soil borings will be logged by SECOR field staff under the supervision of a geologist using the Unified Soil Classification System and standard geologic techniques. Soil samples for logging from the borings will be collected continuously. All soil samples for chemical analysis will be retained in laboratory-supplied jars with Teflon-sealed lids. The samples will be placed on ice for transport to the laboratory accompanied by chain-of-custody documentation. All down-hole drilling and sampling equipment will be steam-cleaned following the completion of each soil boring.

ORGANIC VAPOR PROCEDURES

Soil samples collected during drilling will be analyzed in the field for ionizable organic compounds using a photo-ionization detector (PID) with a 10.2 eV lamp. The test procedure will involve measuring approximately 30 grams from an undisturbed soil sample, placing this soil in a sealed container (either a zip-lock bag or a mason jar). The container will be warmed for approximately 20 minutes, then the head-space within will be tested for total organic vapor, measured in parts per million as benzene (ppm; volume/volume). The instrument will be calibrated prior to drilling using a 100-ppm isobutylene standard (in air) and a sensitivity factor of 55, which relates the photo-ionization potential of benzene to that of isobutylene at 100 ppm. The results of the field-testing will be noted on the boring logs. PID readings are useful for indicating relative levels of contamination, but cannot be used to evaluate hydrocarbon levels with the confidence of laboratory analyses.

GROUNDWATER SAMPLING

Groundwater will be sampled in the borings using either a HydroPunch[®] sampling apparatus or by lowering a clean disposable bailer through the Geoprobe[®] and retrieving a sample of the formation water. Groundwater samples will be collected from first encountered groundwater, and from deeper silty sand units (if encountered) unless first encountered water is within approximately one foot from the silty sand unit. Groundwater samples will be decanted directly from bailers into laboratory supplied glassware. Samples will be sent under chain-of-custody procedures to a California State-certified laboratory. Select grab groundwater samples will be analyzed for TPHg, BTEX, fuel oxygenates by EPA Method 8260B, and lead by EPA Method 6010.

Mr. Don Hwang
May 12, 2005
Page 10

LABORATORY PROCEDURES

Selected soil samples will be analyzed for TPHg, BTEX, fuel oxygenates by EPA Method 8260B, and lead by EPA Method 6010. Select grab groundwater samples will be analyzed for TPHg, BTEX, fuel oxygenates by EPA Method 8260B.

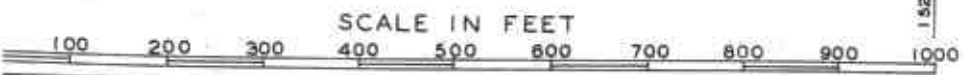
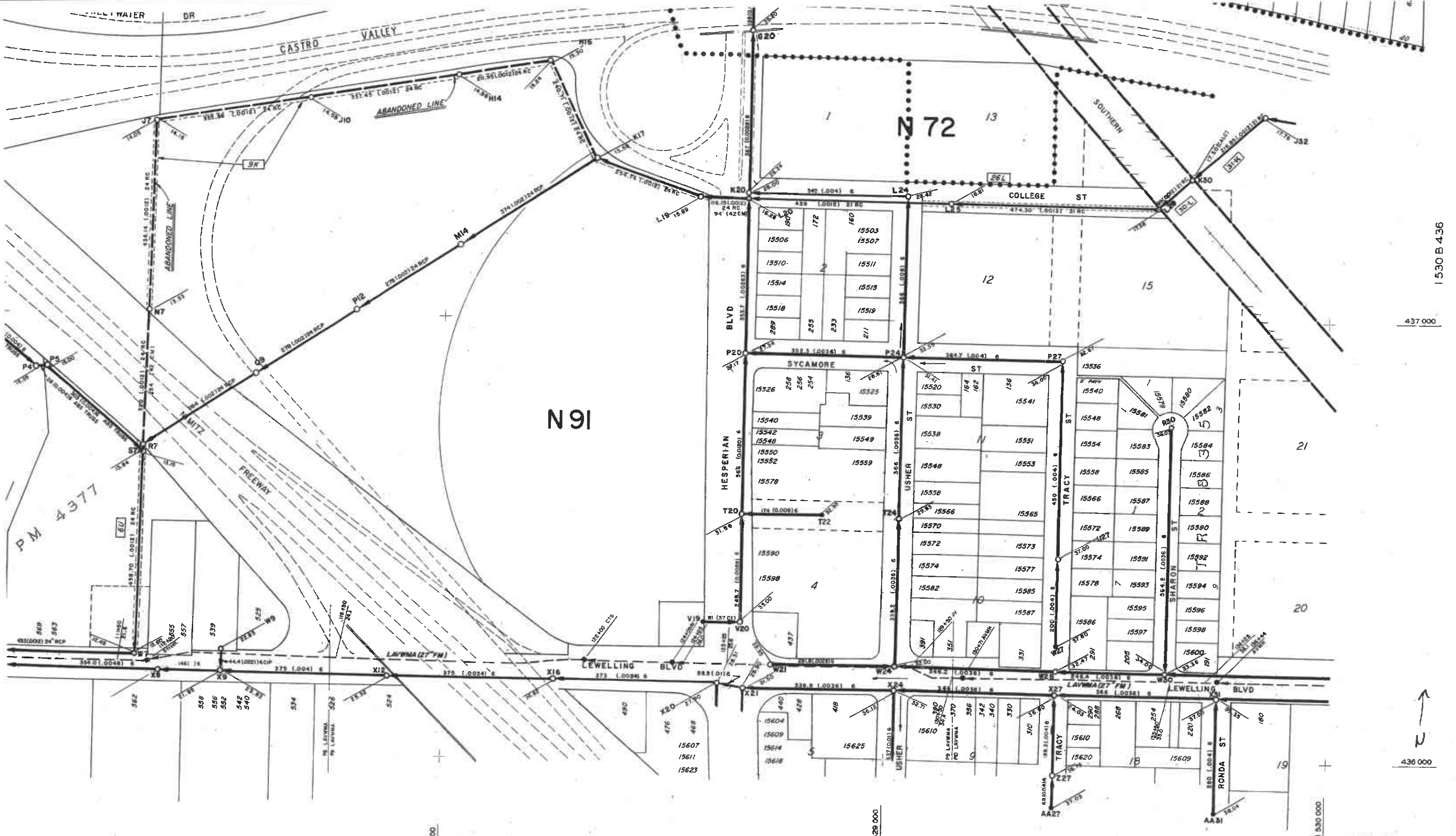
SOIL CUTTINGS AND RINSATE/PURGE WATER

Soil cuttings and rinsate water generated during drilling operations will be temporarily stored onsite in DOT-approved 55-gallon pending characterization and disposal. Soil cuttings and rinsate water will be removed by a licensed disposal contractor and will be transported to an appropriate disposal facility. Drums will be stored in a secure location on the site. Water generated from the mobile DPE unit will be temporarily stored in a 6,900 gallon Baker tank and removed on an as needed basis by a licensed disposal contractor to an appropriate disposal or treatment facility.

ATTACHMENT 3

Utility Maps

Former 76 Service Station No. 7004
15599 Hesperian Boulevard
San Leandro, CA



I 527B 434

This map is based on the California Coordinate System. It is for reference only and the Oro Loma Sanitary District assumes no responsibility for its accuracy.

REVISION		DATE	ORO LOMA SANITARY DISTRICT	
1	ADD	11-72	COLLECTION SYSTEM	
2	ADD	12-87		
3	ADD	8/18/99		
			DATE ISSUED	I 527B 436

JAN 00

I 530 B 436

437 000

436 000

AW



H-10
ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT
 This map has been prepared to show the general location of various flood drainage and flood control facilities. The information shown on this drawing is for general information only and the District assumes no responsibility or liability for the accuracy or completeness of the information shown hereon. This District assumes no responsibility for any use which may be made of this information.

X 1527,000

X 1528,000

X 00033000

X 00046611

1524 D 440

H-9

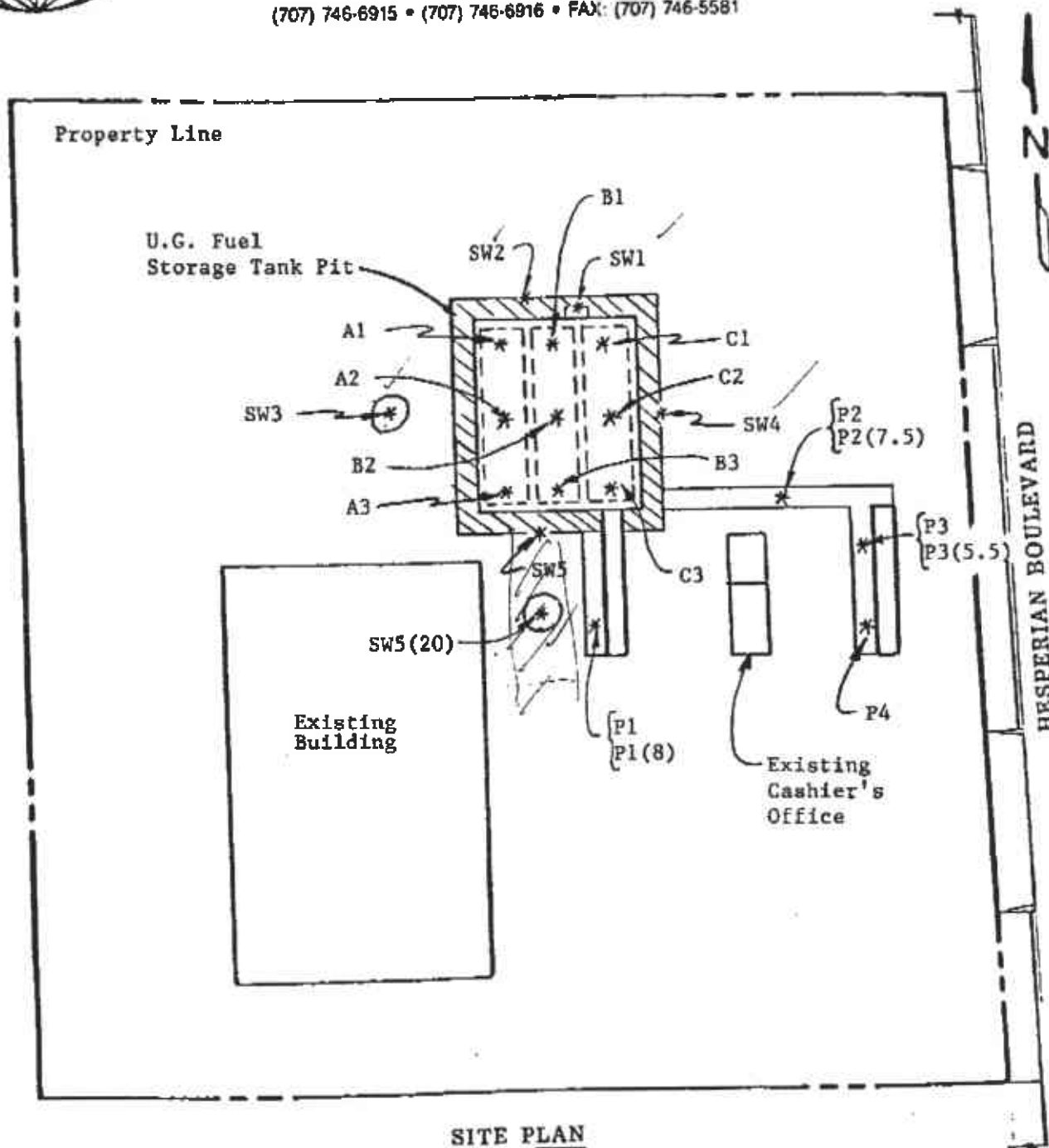
ATTACHMENT 4
Historical Analytical Data
Former 76 Service Station No. 7004
15599 Hesperian Boulevard
San Leandro, CA



KAPREALIAN ENGINEERING, INC.

Consulting Engineers

P.O. BOX 996 • BENICIA, CA 94510
(707) 746-6915 • (707) 746-6916 • FAX: (707) 746-5581



SITE PLAN

LEGEND

- * Sample Point Location
- ▨ Area of Additional Excavation

Show Area of addl. EXCAV.

0 30 60
Approx. scale feet

Unocal S/S #7004
15599 Hesperian Boulevard
San Leandro, CA

KEI-J90-1003.R1
 November 26, 1990

TABLE 1

SUMMARY OF LABORATORY ANALYSES
 SOIL

(Collected on October 12, 19, 22 & 31, and
 November 2, 1990)

<u>Sample</u>	<u>Depth (feet)</u>	<u>TPH as Gasoline</u>	<u>Benzene</u>	<u>Toluene</u>	<u>Xylenes</u>	<u>Ethylbenzene</u>
A1	14.5	350	2.0	3.6	47	7.7
A2	14.5	480	2.4	7.3	49	7.4
A3	14.0	570	0.97	5.6	50	8.3
B1	15.0	180	0.64	0.84	11	3.0
B2	15.0	1,900	9.7	120	250	33
B3	15.0	990	6.3	52	120	16
C1	15.0	270	0.64	3.7	22	5.4
C2	15.0	1,200	4.9	41	150	24
C3	15.0	590	4.6	23	80	9.4
SW1	18.0	3.7	0.21	0.024	0.42	0.14
SW2	18.0	4.5	0.46	0.024	0.46	0.26
SW3	18.0	4.1	0.024	0.0080	0.088	0.058
SW4	18.0	ND	0.0090	ND	0.0070	ND
SW5	18.0	998	0.58	ND	21	19
SW5 (20)	18.0	30	0.054	0.047	0.054	0.46
P1	2.5	1,400	0.22	3.3	72	8.9
P1(8)	8.0	5.7	0.0078	0.0054	0.18	0.033
P2	3.0	3,900	1.1	23	280	41
P2(7.5)	7.5	20	ND	0.11	1.3	0.12
P3	2.5	100	0.057	0.63	12	0.97
P3(5.5)	5.5	9.8	0.015	0.15	1.3	0.13
P4	2.5	19	ND	0.10	0.13	ND
Detection Limits		1.0	0.0050	0.0050	0.0050	0.0050

ND = Non-detectable.

Results in parts per million (ppm), unless otherwise indicated.

KEI-J90-1003.R1
November 26, 1990

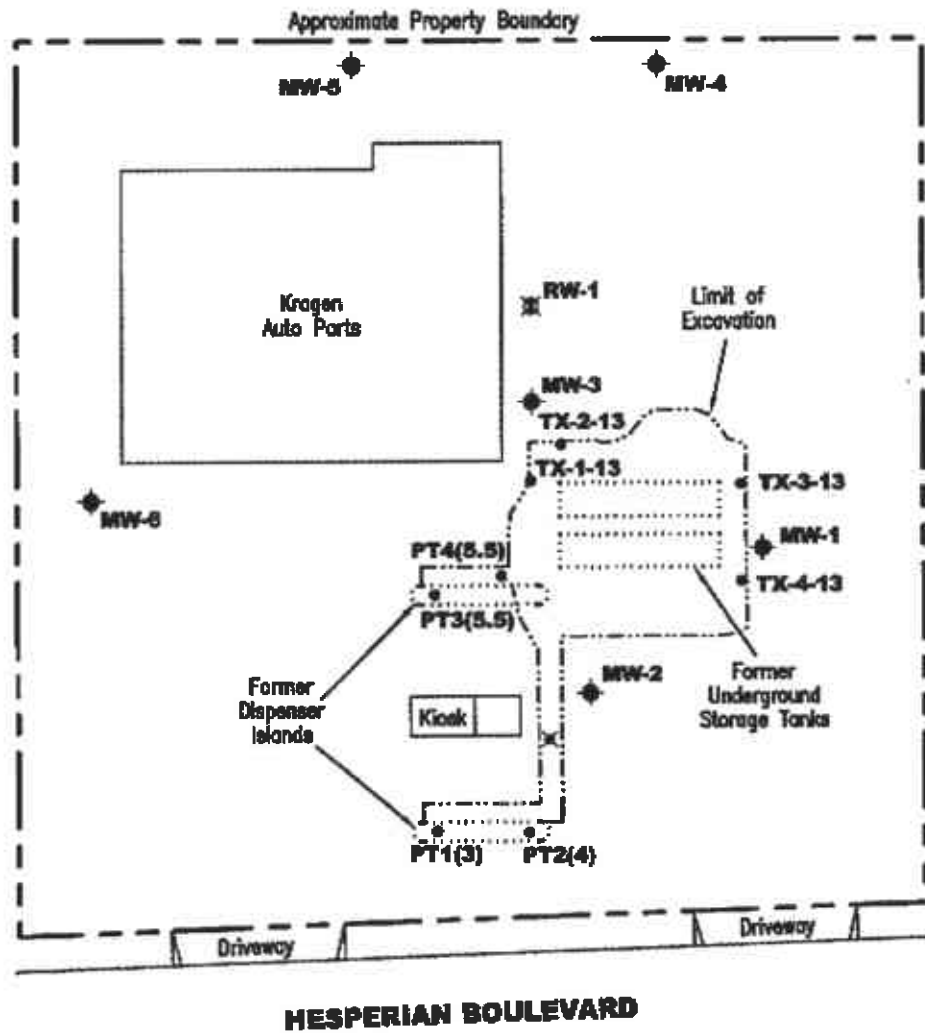
TABLE 2

SUMMARY OF LABORATORY ANALYSES
WATER

(Collected on October 24, 1990)

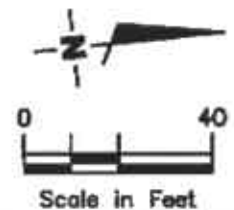
<u>Sample #</u>	<u>TPH as Gasoline</u>	<u>Benzene</u>	<u>Toluene</u>	<u>Xylenes</u>	<u>Ethylbenzene</u>
W1	4,300	40	1.9	520	0.54
Detection Limits	30.0	0.3	0.3	0.3	0.3

Results in parts per billion (ppb), unless otherwise indicated.



EXPLANATION

- ◆ Groundwater monitoring well
- ⊗ Aquifer testing well
- Soil sample location
- × Sample attempted
pea gravel too deep to reach
native soil



Source: Figure modified from drawing provided by MPOS Services Inc.



Gottler - Ryan Inc.

6747 Sierra Ct., Suite J
Dublin, CA 94568 (825) 551-7555

SITE PLAN
Former Tosco (76) Service Station No. 7004
15599 Hesperian Boulevard
San Leandro, California

FIGURE
2

PROJECT NUMBER
140106

REVIEWED BY

DATE
8/00

REVISED DATE

Table 1 - Chemical Analytical Data

Former Tosco 76 Branded Facility No.7004

15599 Hesperian Blvd

San Leandro, California

Sample ID	Date Collected	Sample Depth (feet)	TPHg (ppm)	Benzene (ppm)	Toluene (ppm)	Ethyl-Benzene (ppm)	Xylenes (ppm)	MTBE (ppm)
<u>GASOLINE UST PIT (SOIL)</u>								
TX-1-13	5/26/00	13.0	ND	ND	ND	ND	ND	ND
TX-2-13	5/26/00	13.0	1.1	ND	ND	0.014	0.015	ND
TX-3-13	5/26/00	13.0	350	ND	ND	4.8	0.81	ND
TX-4-13	5/26/00	13.0	4.1	ND	ND	0.016	0.013	ND
<u>PRODUCT LINES (SOIL)</u>								
PT1 (3)	5/24/00	3.0	ND	ND	ND	ND	ND	ND
PT2 (4)	5/24/00	4.0	ND	ND	ND	ND	ND	ND
PT3 (4.5)	5/24/00	4.5	ND	ND	ND	ND	ND	ND
PT4 (5.5)	5/24/00	5.5	ND	ND	ND	ND	ND	ND
<u>GASOLINE TANK PIT STOCKPILE</u>								
Comp S1	5/24/00	NA	ND	ND	ND	ND	ND	ND
Comp S2	5/24/00	NA	ND	ND	ND	ND	ND	ND

TABLE 1 - SOIL SAMPLE CHEMICAL ANALYTICAL DATA

Former Tosco (76) Service Station No. 7004

15599 Hesperian Boulevard

San Leandro, California

Sample No.	Sample Date	Sample Depth (feet)	TPHg (ppm)	Benzene (ppm)	Toluene (ppm)	Ethylbenzene (ppm)	Total Xylenes (ppm)	ETHANOL (ppm)	TBA (ppm)	MTBE (ppm)	DIPE (ppm)	ETBE (ppm)	1,2-DCA (ppm)	TAME (ppm)	EDB (ppm)	Total Lead (ppm)	
G-1 (S10)	9/20/2002	10	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-1 (S14)	9/20/2002	14	<100	<0.50	<0.50	<0.50	<0.50	<20	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	---
G-2 (S5)	9/20/2002	5	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-2 (S10)	9/20/2002	10	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-2 (S14)	9/20/2002	14	<100	<0.50	<0.50	<0.50	<0.50	<20	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	---
G-3 (S5)	9/20/2002	5	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-3 (S10)	9/20/2002	10	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-3 (S13.5)	9/20/2002	14	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	0.083	0.051	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-4 (S10)	9/20/2002	10	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-4 (S13)	9/20/2002	13	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-5 (S5)	9/20/2002	5	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-5 (S10)	9/20/2002	10	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.20	<0.050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	---
G-5 (S13)	9/20/2002	13	<100	<0.50	<0.50	<0.50	<0.50	<0.20	<5.0	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	---
Comp-1 (A,B,C,D)	9/20/2002	na	7.4 ¹	0.035 ¹	0.066 ¹	0.11 ¹	0.074 ¹	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10

EXPLANATION:

ppm = parts per million

--- = Not Analyzed

na = Not Applicable

¹ = Analyses by DHS LUFT

<1.0 = Not detected at or above laboratories listed reporting limit

ANALYTICAL LABORATORY:

Sequoia Analytical Sacramento CA (ELAP #1624)

ANALYTICAL METHOD:

TPHg = Total Petroleum Hydrocarbons as gasoline by EPA Method 8260B

Benzene, Toluene, Ethylbenzene and Total Xylenes by EPA Method 8260B

ETHANOL by EPA Method 8260B

TBA = tert-Butyl alcohol by EPA Method 8260B

MTBE = Methyl tert-butyl ether by EPA Method 8260B

DIPE = Di-isopropyl ether by EPA Method 8260B

ETBE = Ethyl tert-butyl ether by EPA Method 8260B

1,2-DCA = 1,2-Dichloroethane by EPA Method 8260B

TAME = tert-Amyl methyl ether by EPA Method 8260B

EDB = Ethylene Dibromide by EPA Method 8260B

Total Lead by EPA Method 6010A