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ACEH Low Threat Closure Policy Checklist and Site Conceptual Model

Former BP Station #11109,
4280 Foothill Blvd
Oakland, California
ACEH Case #RO0000426

ENVIRONMENT

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

Date:
June 28, 2013

Submitted by:

Contact:
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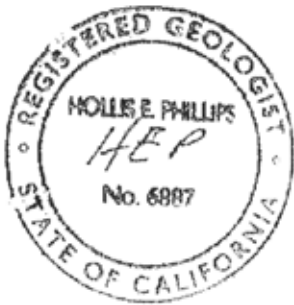
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Imagine the result

Executive Summary

This Alameda County Environmental Health (ACEH) Low Threat Closure (LTC) Policy Checklist and Site Conceptual Model (SCM) was prepared by ARCADIS U.S., Inc. (ARCADIS) on behalf of Atlantic Richfield Company (ARCO), a BP affiliated company, for the former BP service station No. 11109 located at 4280 Foothill Boulevard in Oakland, California (the Site; Appendix A). This report has been prepared in response to discussions between ARCADIS and ACEH during a meeting on March 26, 2013. In the meeting ACEH presented ARCADIS with a draft version of ACEH's LTC Policy Checklist and stated that the LTC Policy Checklist, along with a SCM would be required to determine if the Site is a candidate for closure as a low-threat fuel site.

This report package presents relevant site background information, summarizes previous site investigations, lists the removal action activities and results, presents an assessment of risk to public health and the environment, and includes an evaluation of site conditions relevant to the State Water Resources Control Board (State Water Board) *Low-Threat Underground Storage Tank Case Closure Policy*, adopted by the State Water Board on May 1, 2012 (State Water Board 2012) per the ACEH-provided LTC Policy Checklist.

The objective of this report is to provide the documentation required for ACEH to approve site closure as a low-risk fuel site as described in the LTC Policy (State Water Board 2012). This report is organized into the following sections:

Section 1 - Executive Summary

Section 2 – SCM and Appendices

Section 3 – ACEH LTC Policy Checklists

General Criteria A through H

Media Specific Criteria – Groundwater

Media Specific Criteria – Petroleum Vapor Intrusion to Indoor Air

Media Specific Criteria – Direct Contact and Outdoor Air Exposure

Section 4 – Supplemental ACEH SCM Forms

Site Well Construction Details

Well Survey

Site data collected to date has demonstrated that both the general and applicable media-specific criteria are satisfied according to the measures described in the State Water Board LTC Policy, and therefore, the leaking

UST case is generally considered to present a low threat to human health, safety, and the environment for the following reasons:

- Petroleum hydrocarbon sources, including free product and other potential secondary sources, have been removed to the extent practical.
- Current groundwater concentrations are: Gasoline Range Organics (GRO) ranging from below detection (<50 micrograms per liter [$\mu\text{g/L}$]) to 16,000 $\mu\text{g/L}$, benzene ranging from below detection (<0.50 $\mu\text{g/L}$) to 250 $\mu\text{g/L}$, toluene ranging from below detection (<0.50 $\mu\text{g/L}$) to 620 $\mu\text{g/L}$, ethylbenzene ranging from below detection (<0.50 $\mu\text{g/L}$) to 680 $\mu\text{g/L}$, xylenes ranging from below detection (<1.0 $\mu\text{g/L}$) to 2,200 $\mu\text{g/L}$, and methyl tert-butyl ether (MTBE) ranging from below detection (<0.50 $\mu\text{g/L}$) to 17 $\mu\text{g/L}$. Concentrations of constituents of potential concern (COPCs) above screening levels are limited to the site and not migrating off-site, as indicated by historical data collected at downgradient monitoring well, C-10, located on the adjacent Chevron Site (ACEH Case #RO0000427).
- The Site has been adequately characterized.
- The dissolved GRO, benzene, and MTBE plumes are stable and/or decreasing and do not exceed the maximum extents from the point of release as specified in the LTC Policy.
- Sensitive receptors are not likely to be impacted, including surface-water bodies, municipal wells and drinking water sources based on the limited historical extent of the dissolved GRO, benzene, and MTBE plumes and plume stability.
- The Site presents no current or potential risk to human health or the environment.

Petroleum-hydrocarbon affected groundwater appears to be limited to monitoring wells located at the southern extent of the site (MW-5, MW-10, MW-11 and MW-12), which have reported the highest historical groundwater concentrations. Concentrations of COPCs above ESLs were also detected at MW-4, which is downgradient of the dispenser islands. Separate phase hydrocarbons (SPH) were detected in the most recent monitoring event (March 2013) in monitoring locations MW-5, MW-10, and MW-12, located onsite the southwestern corner of the site and downgradient of the USTs.

In 17 monitoring events conducted between the First Quarter 2006 through the First Quarter 2013 both a southwest and northwest groundwater flow direction were reported at the Site. Historical interpretation of groundwater monitoring data by previous consultants indicated a shift in the groundwater flow direction from southwest to northwest in the third quarter 2009. However, review of historical field notes and groundwater contours indicates that the interpretation of groundwater contours following 2009 did not consider groundwater measurements from the adjacent property, and thus the observed shift in flow direction is not an accurate depiction of local groundwater flow direction. Groundwater elevations collected onsite in March 2013 and groundwater elevations collected at the adjacent Chevron Site during the first quarter 2013, support the current interpretation that the overall groundwater flow direction in the vicinity of the Site is to the southwest, as observed prior to 2009. No data for the site was available prior to 2006.

A cumulative 187 gallons of free product and free product/water mixture have been removed from the site to date. SPH was detected on-site during the most recent monitoring event (March 2013) at thicknesses ranging from sheen to 0.04 feet in monitoring wells MW-5, MW-10, and MW-12. Absorbent socks were placed in each of these wells in May 2013 to remove the minimal SPH observed in March 2013. Results from dual-phase extraction and SPH bail-down events presented in the summary letter submitted to ACEH in June 2013 indicate that SPH remaining at the site is limited in extent and mobility. Additionally, historical SPH has not been detected at off-site monitoring well C-10 (adjacent Chevron Site) located downgradient of the impacted wells, indicating that SPH is not migrating.

All the wells that contain (or recently contained) COPC concentrations in groundwater generally indicate decreasing or stable trends. Groundwater samples collected from MW-11, which is located in the vicinity of MW-5, MW-10, and MW-12, during the most recent sampling event (First Quarter 2013) indicated that COPCs have decreased from initial concentrations observed following installation in 2009. Similarly, historical data indicate concentrations of MTBE at MW-4 located cross gradient of the dispenser islands have steadily decreased. Trends for COPCs in wells MW-5, MW-10, and MW-12 cannot currently be determined due to the presence of free product; however, concentrations of COPCs are anticipated to continue to decrease following removal actions discussed above and continued attenuation of residual free product. COPCs (with the exception of MTBE which was below ESLs during the most recent sampling event) have not been detected in downgradient well C-10, indicating that impacts to groundwater due to residual free product on-site are not migrating off-site.

Site data collected to date has demonstrated that both the general and applicable media-specific criteria are satisfied according to the measures within State Water Board LTC Policy, and therefore, the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. As presented in Section 3 of this report, the site fulfills each of the *General Media Specific* criteria (classes A through H) in accordance with the State Water Board LTC Policy. Class A of the *Groundwater-Media Specific* criteria is fulfilled according to available site data. The Site qualifies for an exemption from the *Petroleum Vapor Intrusion to Indoor Air* criteria as the Site is an active commercial fueling facility and the historical release characteristics are comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities. The Site satisfies the *Direct Contact and Outdoor Air Exposure* criteria as it fulfills the requirements in the soil 0 to 5 feet bgs, 5 to 10 feet bgs, and 0 to 10 feet bgs scenarios and Volatilization to Outdoor Air scenario.

Available data from the Site suggests that the Site is adequately characterized and there are no additional data gaps. The Site appears to be a candidate for closure as a low-risk fuel site as described in the State Water Board LTC Policy. ARCADIS recommends that a status of no further action (NFA) be granted, and the Site be granted regulatory closure. During case closure evaluation ARCADIS requests the following:

- Suspension of groundwater monitoring and reporting, which includes the August 2013 sampling event, pending approval of site closure by the ACEH.
- Preparation of a work plan for monitoring well decommissioning upon site closure approval by ACEH.



SCM Table

Table 1
Site Conceptual Model
Former BP Station #11109
4280 Foothill Boulevard Oakland, California 94601
ACEH Case #RO0000426

SCM Element	SCM Sub-Element	Description	Potential Data Gaps	How To Address	References
Geology and Hydrology	Regional	<p>Geology: According to the East Bay Plain Groundwater Basin Beneficial Use Evaluation Report (California Regional Water Quality Control Board – San Francisco Bay Region/SFRWQCB, June 1999), the Site is located within the Oakland Sub-Area of the East Bay Plain of the San Francisco Basin. The Oakland Sub-Area contains a sequence of alluvial fans. The alluvial fill thickness ranges from 300 to 700 feet deep. There are no well-defined aquitards such as estuarine muds. The largest and deepest wells in this sub-area historically pumped one to two million gallons per day at depths greater than 200 feet. Overall, sustainable yields are low due in part to low recharge potential. The Merritt sand in West Oakland was an important part of the early water supply for the City of Oakland. It is shallow (up to 60 feet), but before the turn of the last century, septic systems contaminated the water supply wells.</p> <p>Hydrology: Throughout most of the Alameda County portion of the East Bay Plain, from Hayward north to Albany, water level contours show that the general direction of ground-water flow is from east to west or from the Hayward Fault to the San Francisco Bay. Ground-water flow direction generally correlates to topography. Flow direction and velocity are also influenced by buried stream channels that typically are oriented in an east to west direction. In the southern end of the study area however, near the San Lorenzo Sub-Area, the direction of flow may not be this simple. According to information presented in East Bay Plain Groundwater Basin Beneficial Use Evaluation Report, the small set of water level measurements available seemed to show that the ground water in the upper aquifers may be flowing south, with the deeper aquifers, the Alameda Formation, moving north. The nearest natural drainage is Peralta Creek, located approximately 1,500 feet west of the Site. Peralta Creek flows generally north to south at its closest distance from the Site.</p>	None	NA	ARCADIS U.S. Inc. 2010. <i>Revised Feasibility Study and Corrective Action Plan, Former BP Service Station No. 11109.</i> October 8.
	Site	<p>Geology: Soils underlying the Site have been consistently characterized as interbedded layers of sandy clay or silty clay, clayey silt, clayey sand, and clayey gravel with occasional sand or gravelly sand.</p> <p>Hydrology: Groundwater has typically been encountered at the site from approximately 6 to 30 feet bgs. Resulting groundwater elevations have varied from approximately 10 ft above mean sea level to 35 ft amsl. DTW measurements in the most recent sampling event (March 2013) ranged from 9.48 ft below top of casing (bTOC) at MW-10 to 14.36 ft bTOC at MW-6. Resulting groundwater surface elevations on-site ranged from 29.05 feet above mean sea level (ft msl) at MW-8 to 34.06 ft msl at MW-9.</p> <p>Groundwater flow at the Site has historically been reported as varying between northwest and southwest at gradients ranging from 0.05 ft/ft to 0.006 ft/ft. Historical interpretation of groundwater monitoring data by previous consultants indicated a shift in the groundwater flow direction from southwest to northwest in the third quarter 2009. However, review of historical field notes and groundwater contours indicates that the interpretation of groundwater contours following 2009 did not consider groundwater measurements from the adjacent property, and thus the observed shift in flow direction is not entirely supported. Groundwater elevations collected in March 2013 and consideration of groundwater measurements collected at the adjacent Chevron Site support the current interpretation that the overall groundwater flow direction in the vicinity of the Site is to the southwest, as observed prior to 2009. Groundwater elevations calculated for the Site and the adjacent Chevron facility yielded an average horizontal gradient of approximately 0.03 ft/ft.</p>	None	NA	ARCADIS U.S. Inc. 2010. <i>Revised Feasibility Study and Corrective Action Plan, Former BP Service Station No. 11109.</i> October 8. ARCADIS U.S. Inc. 2013. <i>Fourth Quarter 2012 and First Quarter 2013 Semi-Annual Groundwater Monitoring Report, Former BP Station #11109, 4280 Foothill Blvd, Oakland, California.</i> April 30.
Surface Water Bodies and other potential receptors	--	The closest surface water body is Peralta Creek, located approximately 3,500 feet west of the site. No other surface water bodies are located within a one-half mile radius of the site.	None	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7.
Nearby Wells	--	A sensitive receptors survey was conducted by Alton Geoscience on 29 January 1992. This survey concluded that no public water supply wells are located within 2,500 feet of the site and no private water supply wells are located within 1,000 feet of the site. In 2013 the East Bay Municipal Utility District (EBMUD) confirmed no public water supply wells exist within 2,500 feet of the site. The nearest residence was stated to be adjacent the site. The playing fields of Fremont High School are located approximately 100 feet from the Site and the nearest hospital is approximately 6,000 feet away.	None	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7. Phone conversation with Tom Francis, Senior Civil Engineer of EBMUD, on June 27, 2013.
Beneficial Uses	--	According to the East Bay Plain Groundwater Basin Beneficial Use Evaluation Report, the City of Oakland does not have "any plans to develop local groundwater resources for drinking water purposes, because of existing or potential saltwater intrusion, contamination, or poor or limited quantity." However, the California Regional Water Quality Control Board – San Francisco Bay Region's Basin Plan denotes existing beneficial uses of municipal and domestic supply (MUN), industrial process supply (PROC), industrial service supply (IND), and agricultural supply (AGR) for the East Bay Plain ground-water basin.	None	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7.

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ACEH Case #RO0000426

SCM Element	SCM Sub-Element	Description	Potential Data Gaps	How To Address	References
Local Water Supply	--	Local water is supplied by the East Bay Municipal Water District (EBMUD). The supplier's water source is provided by Sierra snow melt and the Pardee Reservoir. The current water supply management plan for EBMUD indicates potential use of the East Bay Plain Basin for temporary storage of drinking water in wet years for eventual extraction; however, planned injection and extraction wells are located 8 miles south the site and will be screened within the deep aquifer.	None	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7. East Bay Municipal Utility District. 2012 Water Supply Management Program 2040 Plan. April.
Constituents of Potential Concern	--	<i>Soil:</i> The constituents of potential concern (COPCs) in soil at the Site include Total Petroleum Hydrocarbons as Gasoline (TPH-g), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX).	None	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7. Broadbent & Associates, Inc. 2009. <i>Soil and Ground-Water Investigation Report, Former BP Service Station No. 11109, 4280 Foothill Boulevard, Oakland, California.</i> June 17.
		<i>Groundwater:</i> The constituents of potential concern (COPCs) in soil at the Site include Total Petroleum Hydrocarbons as Gasoline (TPH-g), benzene, toluene, ethylbenzene, and xylenes (collectively BTEX).	None	NA	ARCADIS U.S. Inc. 2013. <i>Fourth Quarter 2012 and First Quarter 2013 Semi-Annual Groundwater Monitoring Report, Former BP Station #11109, 4280 Foothill Blvd, Oakland, California.</i> April 30.
Potential Sources	--	Historical reports and observed contaminant concentrations indicate the primary source area is the UST complex located in the northeastern portion of the Site. Concentrations of petroleum hydrocarbons have also been observed in shallow soils beneath the dispenser pump islands.	HC in southern portion appear to be smear-zone mass	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7.
Nature and Extent of Environmental Impacts	COC Extent in Soil	<p>Petroleum-hydrocarbon affected soil has been encountered during removal of USTs, excavation activities, and soil boring and monitoring well installation events at the site. Laboratory analysis of soil samples collected from soil borings confirmed the presence of petroleum hydrocarbons in soils beneath the site at concentrations exceeding SFR-RWQCB Environmental Screening Levels (ESLs) for TPHg and BTEX constituents (Table K-2).</p> <p>Elevated petroleum hydrocarbon concentrations were primarily detected in soil samples collected at 10 to 30 feet bgs from soil borings installed downgradient of the UST complex and dispenser islands. Maximum concentrations of COCs appear to primarily have been detected within the range of historical groundwater elevations, indicating historical impacts are primarily within the smear zone.</p> <p>Maximum concentrations of COCs, detected in samples collected from soil boring location MW-11 at 24 feet bgs, are as follows: TPHg at 6,500 mg/kg, benzene at 22 mg/kg, toluene at 86 mg/kg, ethylbenzene at 95 mg/kg, and xylenes at 460 mg/kg. Elevated concentrations of TPH (greater than 1,000 mg/kg) were also observed at boring locations MW-5, MW-10, and MW-12, additionally within the range of historical groundwater elevation fluctuations.</p> <p>Soil analytical data collected during the monitoring well installation activities in 1990 by AGS and subsurface investigations in 1990 by KEI and 1994 by EMCON indicate that the lateral extent of COCs in the vicinity of the USTs and at the northwestern, northeastern, and southeastern boundaries have been delineated. The extent of COCs in soil on the southwestern boundary has not been delineated on-site beyond exceedances observed in soil boring locations MW-5, MW-10, MW-11, and MW-12; however, historical soil analytical data indicates that impacts are primarily limited to the smear zone at all four boring locations. Soil boring data collected from downgradient monitoring well C-10 at the adjacent Chevron site indicates that COCs from the Site were not detected above screening levels downgradient of the site. Supporting groundwater data collected from boring C-10 have been below laboratory reporting limits for TPHg and BTEX since monitoring was initiated, indicating COCs are not migrating off-site and the current extent of impacts to soil is limited to the immediate vicinity of boring locations MW-5, MW-10, MW-11, and MW-12.</p>	None	NA	<p>Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7.</p> <p>Broadbent & Associates, Inc. 2009. <i>Soil and Ground-Water Investigation Report, Former BP Service Station No. 11109, 4280 Foothill Boulevard, Oakland, California.</i>. June 17.</p> <p>Cambria Environmental Technology, Inc. 2003. <i>Well Installation Report/Site Summary, Chevron Station #9-0076, 4265 Foothill Boulevard, Oakland, California.</i> October 8.</p> <p>SFRWQCB. 2013. <i>Environmental Screening Levels, Interim Final.</i> May.</p>
	COC Extent in Groundwater	<p>The site specific clean up limits used are based on SFR-RWQCB ESLs (Table F-3) for TPHg (100 µg/L), benzene (1 µg/L), toluene (150 µg/L), ethylbenzene (300 µg/L), total xylenes (1,800 µg/L) and MTBE (13 µg/L).</p> <p>Groundwater has been sampled and analyzed for fuel hydrocarbons and oxygenates on a quarterly or semi-annual basis since 1990. Historically, analytes detected above ESLs in groundwater include TPHg, Benzene, Toluene, Ethylbenzene, Xylenes, and MTBE. Historical and recent groundwater data indicates that groundwater impacts are limited to the southern portion of the site downgradient of the former USTs. Maximum TPHg and BTEX concentrations were detected at wells MW-5, MW-10, and MW-12, at the southern extent of the site. Data collected during the most recent groundwater sampling event (March 2013) indicate that MTBE is still above screening levels in well MW-4 and TPHg and benzene are above screening levels in well MW-11. Monitoring wells MW-5, MW-10, and MW-12 were not sampled due to the presence of SPH. Offsite downgradient well, C-10, has not indicated the presence of site COCs since monitoring began in 2003 with the exception of MTBE which has been below ESLs since 2012. The nature and extent of COCs exceeding ESLs at the site is discussed below by analyte.</p>	None	NA	<p>ARCADIS U.S. Inc. 2013. <i>Fourth Quarter 2012 and First Quarter 2013 Semi-Annual Groundwater Monitoring Report, Former BP Station #11109, 4280 Foothill Blvd, Oakland, California.</i> April 30.</p> <p>SFRWQCB. 2013. <i>Environmental Screening Levels, Interim Final.</i> May.</p>

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SCM Element	SCM Sub-Element	Description	Potential Data Gaps	How To Address	References
Nature and Extent of Environmental Impacts	COC Extent in Groundwater	<p><i>TPH-g</i>: The historical maximum concentration of 270,000 µg/L was detected in a groundwater sample collected on October 7, 1994 from well MW-5, located at the southern extent of the site. The most recently observed concentration at MW-5 was 67,000 µg/L in March 2010. During the most recent sampling event on March 20, 2013, TPHg was detected in monitoring well MW-11 above the ESL at a concentration of 16,000 µg/L. Concentrations of TPHg above ESLs have been observed within the past two years at wells MW-4, MW-7, and MW-11. Samples have not been collected from monitoring wells MW-5 and MW-12 since March 2010 and well MW-10 since February 2011 due to the presence of free product; however the TPHg concentrations in the most recently collected samples exceeded ESLs. (67,00 µg/L at MW-5; 61,000 µg/L at MW-10; 39,000 µg/L at MW-12).</p> <p><i>Benzene</i>: The historical maximum concentration of 13,000 µg/L was detected in a groundwater sample collected on October 3, 1991 from well MW-5, located at the southern extent of the site. The most recently observed concentration at MW-5 was 1,400 µg/L in March 2010. During the most recent sampling event on March 20, 2013, benzene was detected in monitoring well MW-11 above the ESL at a concentration of 250 µg/L. Concentrations of benzene above ESLs have been observed within the past two years at wells MW-7 and MW-11. Samples have not been collected from monitoring wells MW-5 and MW-12 since March 2010 and well MW-10 since February 2011 due to the presence of free product; however the benzene concentrations in the most recently collected samples exceeded ESLs (1,400 µg/L at MW-5; 7,000 µg/L at MW-10; 4,800 µg/L at MW-12).</p> <p><i>Toluene</i>: The historical maximum concentration of 7,400 µg/L was detected in a groundwater sample collected on October 3, 1991 from well MW-5, located at the southern extent of the site. The most recently observed concentration at MW-5 was 380 µg/L in March 2010. During the most recent sampling event on March 20, 2013, toluene was detected in monitoring well MW-11 above the ESL at a concentration of 620 µg/L. Concentrations of toluene above ESLs have been observed within the past two years at well MW-11 only. Samples have not been collected from monitoring wells MW-5 and MW-12 since March 2010 and well MW-10 since February 2011 due to the presence of free product; however the toluene concentrations in the most recently collected samples exceeded ESLs (380 µg/L at MW-5; 5,300 µg/L at MW-10; 1,000 µg/L at MW-12).</p> <p><i>Ethylbenzene</i>: The historical maximum concentration of 3,100 µg/L was detected in groundwater samples collected on October 28, 2009 and March 23, 2010 from wells MW-10 and MW-12, respectively. Both wells are located at the southern extent of the site. During the most recent sampling event on March 20, 2013, ethylbenzene was detected in monitoring well MW-11 above the ESL at a concentration of 680 µg/L. Concentrations of ethylbenzene above ESLs have been observed within the past two years at well MW-11 only. Samples have not been collected from monitoring wells MW-5 and MW-12 since March 2010 and well MW-10 since February 2011 due to the presence of free product; however the ethylbenzene concentrations in the most recently collected samples exceeded ESLs (620 µg/L at MW-5; 2,800 µg/L at MW-10; 3,100 µg/L at MW-12).</p> <p><i>Total xylenes</i>: The historical maximum concentration of 12,000 µg/L was detected in a groundwater sample collected on October 28, 2009 from well MW-10, located at the southern extent of the site. The most recently observed concentration at MW-5 was 1,800 µg/L in March 2010. During the most recent sampling event on March 20, 2013, xylenes were detected in monitoring well MW-11 above the ESL at a concentration of 2,200 µg/L. Concentrations of xylenes above ESLs have been observed within the past two years at well MW-11 only. Samples have not been collected from monitoring wells MW-5 and MW-12 since March 2010 and well MW-10 since February 2011 due to the presence of free product; however the xylenes concentrations in the most recently collected samples exceeded ESLs (1,800 µg/L at MW-5; 6,400 µg/L at MW-10; 12,000 µg/L at MW-12).</p> <p><i>MTBE</i>: The historical maximum concentration of 2,002 µg/L was detected in a groundwater sample collected on April 7, 1994 from well MW-5, located at the southern extent of the site. During the most recent sampling event on March 20, 2013, MTBE was detected in monitoring well MW-4 above the ESL at a concentration of 17 µg/L. Concentrations of MTBE above ESLs have been observed within the past two years at wells MW-3, MW-4, and MW-11. Samples have not been collected from monitoring wells MW-5 and MW-12 since March 2010 and well MW-10 since February 2011 due to the presence of free product; however the MTBE concentrations in the most recently collected samples were below method detection limits (<5.0 µg/L at MW-5; <100 µg/L at MW-10; <25 µg/L at MW-12).</p>	None	NA	<p>ARCADIS U.S. Inc. 2013. <i>Fourth Quarter 2012 and First Quarter 2013 Semi-Annual Groundwater Monitoring Report, Former BP Station #11109, 4280 Foothill Blvd, Oakland, California</i>. April 30.</p> <p>SFRWQCB. 2013. <i>Environmental Screening Levels, Interim Final</i>. May.</p>

**Table 1
Site Conceptual Model
Former BP Station #11109
4280 Foothill Boulevard Oakland, California 94601
ACEH Case #RO0000426**

SCM Element	SCM Sub-Element	Description	Potential Data Gaps	How To Address	References
Nature and Extent of Environmental Impacts	SPH Extent in Groundwater	SPH was first detected in on-site well MW-5 during quarterly monitoring and sampling activities conducted on December 4, 1991 by KEI. Free product has been historically observed in wells MW-5, MW-10, MW-11, and MW-12 with thicknesses ranging from sheen to 1.30 ft. Consistent free product measurement and removal began in 1992 for MW-5 and 2009 for MW-10, MW-11, and MW-12. A cumulative volume of 187 gallons of free product and free product/water mixture has been removed at the site to date. Free product thicknesses increased at MW-5, MW-10, and MW-12 following a dual-phase extraction pilot study; therefore, three LNAPL bail-down events were performed monthly from November 2012 to January 2013 to characterize the extent of residual LNAPL. Results from the bail-down test indicate the extent of LNAPL remaining at the site is limited, and decreasing rates of LNAPL recharge during bailing activities indicate the mobility of LNAPL at the site is very limited. Additionally, LNAPL has not been detected at downgradient off-site well C-10 at the adjacent Chevron station, indicating that LNAPL is not migrating.	None	NA	Broadbent & Associates, Inc. 2008. <i>Initial Site Conceptual Model, Former BP Station #11109, 4280 Foothill Boulevard, Oakland, California.</i> . November 7. ARCADIS U.S. Inc. 2013. Results of DPE Test and SPH Removal, Former BP Station #11109, 4280 Foothill Blvd, Oakland, California. May.
Migration Pathways	Potential Conduits	Although ARCADIS has not conducted a utility survey at this Site, typical utility trenches are located at a depth of 2 to 4 feet bgs. Although historically, groundwater has been encountered as shallow as 2.3 feet bgs, groundwater has generally been encountered 7 to 15 feet bgs.	None	NA	ARCADIS U.S. Inc. 2013. Fourth Quarter 2012 and First Quarter 2013 Semi-Annual Groundwater Monitoring Report, Former BP Station #11109, 4280 Foothill Blvd, Oakland, California. April 30.
Potential Release Mechanisms and Exposure Pathways	Volatilization	A potential release mechanism at the Site may include volatilization of COPCs in subsurface soil to indoor air of current and future onsite commercial buildings, outdoor air, or air within a trench used by a future onsite utility worker. Another potential release mechanism at the Site may include volatilization of COPCs in groundwater to indoor air of current and future onsite commercial buildings, outdoor air, and/or indoor air of offsite commercial buildings or future offsite residences, or air within a trench used by a future onsite utility worker. In general, exposure to petroleum vapors migrating from soil or groundwater to indoor air may pose unacceptable human health risks. However, in many petroleum release cases, potential human exposures to vapors are mitigated by bioattenuation processes as vapors migrate toward the ground surface. Additionally, exposures to volatile petroleum hydrocarbon constituents associated with historical fuel system releases are insignificant relative to typical exposures from surface spills and fugitive vapors at active service stations. Therefore, the exposure pathway for inhalation of indoor air from possible volatilization of site-related soil and groundwater constituents is potentially complete but insignificant for current and future onsite service station workers. However, to support risk-based decision making for the Site, it is assumed that COPCs in groundwater may volatilize into current and future offsite buildings. Although the COPCs may volatilize from subsurface soil and/or groundwater to outdoor air or air within a utility trench and may be inhaled by onsite or offsite potential receptors, this exposure pathway is considered to be insignificant given the atmospheric dilution effects from wind.	None	NA	
	Leaching to Groundwater	Petroleum hydrocarbons released from USTs and associated piping and dispensers also may leach from soil to groundwater. This release mechanism is likely responsible for the majority of historical groundwater impacts. However this release mechanism has likely been partially mitigated through the removal of impacted soil, weathering, remediation, and natural attenuation. Current leaching to groundwater risks are due to the presence of free product in monitoring wells MW-5, MW-10, and MW-12. Historical and recent LNAPL removal activities have removed a significant fraction of recoverable LNAPL at the site to the extent practicable. Residual LNAPL may serve as a source to groundwater; however, downgradient concentrations at the adjacent Chevron site indicate that impacts to groundwater are limited in extent and are not migrating off-site.	None	NA	
	Direct Contact with Groundwater	As described previously, groundwater at the Site is not used as a potable source at this time and is not expected to be used as a drinking water source in the near future. No water wells are located within a 1,000-foot radius of the site. Therefore, potential direct contact exposures to COPCs in groundwater, such as tap water ingestion, dermal contact with tap water and inhalation of volatile organic compounds (VOCs) released from tap water, are not expected to occur for current and future onsite commercial workers, and current and future offsite commercial workers. In the future, onsite construction workers may be directly exposed to groundwater while performing routine utility activities in subsurface trenches. Typical utility trenches are located at a depth no greater than 8 feet bgs. During the March 2013 groundwater monitoring event, groundwater was encountered at depths ranging from approximately 10 to 15 feet bgs. Typically at construction sites when groundwater is exposed, dewatering occurs or workers are not required to work in standing water. Thus, it is unlikely that future onsite utility trench workers will be directly exposed to constituents in groundwater.	None	NA	

Table 1
Site Conceptual Model
Former BP Station #11109
4280 Foothill Boulevard Oakland, California 94601
ACEH Case #RO0000426

SCM Element	SCM Sub-Element	Description	Potential Data Gaps	How To Address	References
Potential Release Mechanisms and Exposure Pathways	Direct Contact with Soil	Constituents adhered onto dust particles may migrate from exposed subsurface soil by wind erosion to outdoor air and be breathed by potential onsite and offsite receptors. This transport mechanism is unlikely given that re-development of the Site is not planned, and the Site is either covered with a building, fuel dispensers, landscaping or asphalt pavement and soil is not exposed at the surface. However, potential receptors including future onsite construction/utility trench workers may be directly exposed to constituents in surface and subsurface soil via incidental ingestion, dermal contact and inhalation of dust particles in trench air. If subsurface work is conducted at the Site, monitoring may be required during excavation.	None	NA	
Potential Receptors	Potential Ecological Receptors	Since the Site is devoid of ecological habitat and surface water is absent, it is reasonable to assume that ecological receptors are absent from the Site and will also not be present in the future. As discussed previously, the Site is located approximately 3,500 feet east of Peralta Creek, which is the nearest surface water body to the Site. Based on the approximate groundwater flow direction at the Site (southwest), it is not possible that groundwater from the Site may migrate towards the surface water receptor, with subsequent exposures to aquatic organisms. Additionally, given the sizable distance to the creek and the potential for COPCs to bioattenuate and dilute, this transport mechanism is considered insignificant. Based on this analysis, potential exposure pathways for ecological receptors are incomplete. Potentially complete exposure pathways for human receptors are presented in the following section.	None	NA	
	On-site and Off-site	Potential receptors were identified based on current and future land use(s) at the Site. Current and reasonably anticipated future land use at the Site are commercial (i.e., continued operation as a service station). Potential current and future human receptors at the Site include: <ul style="list-style-type: none"> • on-site commercial workers, • off-site commercial workers on adjacent, downgradient properties, and • future on-site construction/utility workers. Although residential properties are located adjacent to the northwestern boundary of the Site (cross-gradient), the downgradient Site is commercial service station (LUST Cleanup Site; Case # RO0000427) and likely to remain commercial use in the future. However, future hypothetical off-site residents are considered potential receptors to support conservative risk-based decision making for the Site.	None	NA	
Exposure Pathway Evaluation	Current and Future On-site Commercial Workers	<ul style="list-style-type: none"> • No complete exposure pathways The COPCs may volatilize from soil and groundwater to soil gas and migrate to the indoor air of on-site building structures. Inhalation of volatile COPCs in indoor air by on-site commercial workers at this site may be a potentially complete exposure pathway. However, the potential vapor migration exposure pathway for current and future onsite indoor service station workers is likely to be insignificant compared to routine exposures associated with the profession. The workplace vapor concentrations are routinely much higher than any levels expected from vapor migration from the subsurface. Given the presence of indoor and exterior building sources of petroleum hydrocarbons, and the fact that fuel operations are currently conducted at the Site and that operations at the Site are likely to remain the same in the future, subsurface residual impacts are unlikely to contribute significantly to indoor VOC levels. Thus, inhalation of volatile COPCs in indoor air by current and future on-site commercial workers is not a significant exposure pathway.	None	NA	
	Current and Future Off-Site Commercial Workers	<ul style="list-style-type: none"> • Groundwater transport off-site and vapor migration into indoor air The COPCs may volatilize from groundwater to soil gas and migrate to the indoor air of off-site building structures. Inhalation of volatile COPCs in indoor air by current and future off-site commercial workers is a potentially complete exposure pathway. However, given that the downgradient Site is commercial service station (LUST Cleanup Site; Case # RO0000427) and likely to remain commercial use in the future, inhalation of volatile COPCs in indoor air by current and future off-site commercial workers is likely to be insignificant compared to routine exposures associated with the profession. <p>Direct-contact exposure pathways (i.e., ingestion, dermal contact, and inhalation of volatile emissions from tap water) from groundwater are currently incomplete, since the community uses municipal-supplied water for potable uses. It is assumed that current land and beneficial water uses will continue in the foreseeable future. Therefore, these pathways are also assumed to be incomplete in the reasonably foreseeable future for off-site commercial workers located on downgradient, adjacent properties.</p>	None	NA	

Table 1
Site Conceptual Model
Former BP Station #11109
4280 Foothill Boulevard Oakland, California 94601
ACEH Case #RO0000426

SCM Element	SCM Sub-Element	Description	Potential Data Gaps	How To Address	References
Exposure Pathway Evaluation	Future On-Site Construction/ Utility Workers	<ul style="list-style-type: none"> Inhalation (outdoor air) of vapors Inhalation (outdoor air) of dust particles Incidental ingestion of surface and subsurface soil Dermal contact with surface and subsurface soil <p>Potential future on-site utility trench workers may be directly exposed to COPCs in surface and subsurface soil via incidental ingestion, dermal contact and inhalation of dust particles in trench air. Since soil data indicates that the Site satisfies the Direct Contact and Outdoor Air Exposure – Utility Worker (soil: 0 to 10 feet bgs) criteria stated in the State Water Resources Control Board (State Water Board) Low Threat Closure (LTC) Policy¹⁴, these pathways are also assumed to be incomplete in the reasonably foreseeable future for utility workers located on onsite.</p>	None	NA	
	Current and Future Hypothetical Off-Site Residents	<ul style="list-style-type: none"> Groundwater transport off-site and vapor migration into indoor air <p>The COPCs may volatilize from groundwater to soil gas and migrate to the indoor air of off-site building structures. Inhalation of volatile COPCs in indoor air by current and future off-site residents is a potentially complete exposure pathway. However, given that the downgradient Site is commercial service station (LUST Cleanup Site; Case # RO0000427) and likely to remain commercial use in the future, completion of the exposure pathway is unlikely.</p>	None	NA	

Abbreviations

bgs = below ground surface
msl = mean sea level
ft/ft = feet per foot
btoc = below top of casing
ACEH = Alameda County Environmental Health
DPE = dual-phase extraction
LUFT = leaking underground fuel tank
EBMUD = East Bay Municipal Utility District
COPCs = constituents of potential concern
GRO/TPH-G = Total Petroleum Hydrocarbons as Gasoline Range Organics
DRO/TPH-D = Total Petroleum Hydrocarbons as Diesel Range Organics
MTBE = methyl tertiary-butyl ether
USTs = underground storage tanks
SPH = separate phase hydrocarbons
SFRWQCB = San Francisco Bay Regional Water Quality Control Board
ESLs = environmental screening levels
mg/kg = milligrams per kilogram
µg/L = micrograms per liter
VOCs = volatile organic compounds

List of Appendices

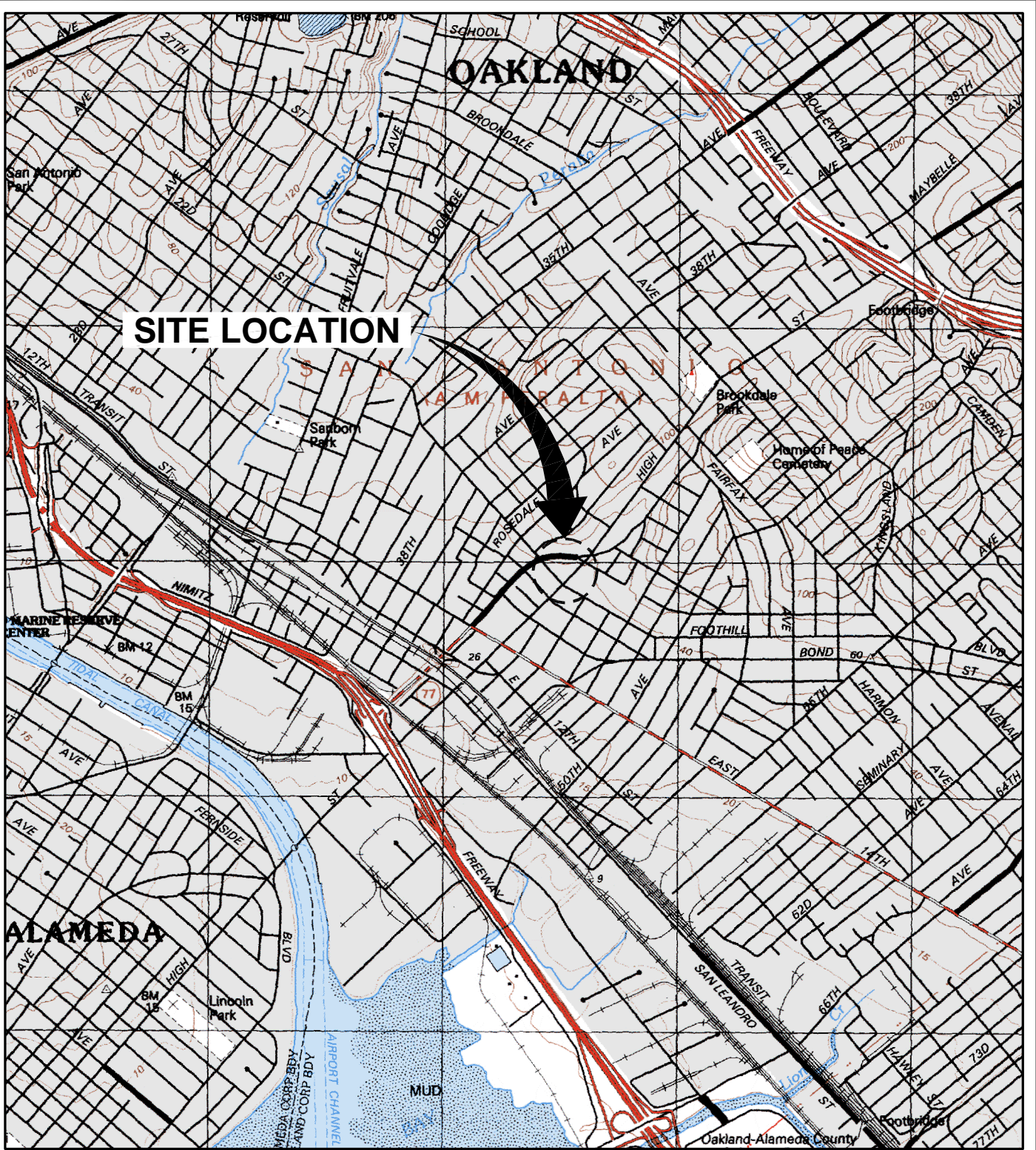
Appendix A - Site Location and Site Plan Figures
Appendix B - Groundwater Flow Direction and Historical Gradients Table
Appendix C - Soil Boring Logs
Appendix D - Historical Soil Data
Appendix E - Groundwater Data and Figures
Appendix F - Historical Soil Vapor Data



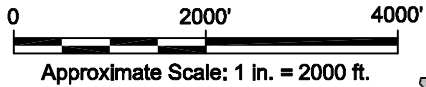
Appendix A

Site Location Map and Site Plan
Figures

CITY: POTALUMA, CA DIV: GROUP: ENV DB: J. HARRIS LD: PIC: RM: H. PHILLIPS TM: B. MCKENNA LYR: (O) (N) = OFF = REF.
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REFERENCE: BASE MAP USGS 7.5. MIN. TOPO. QUAD., OAKLAND WEST, CA., 1993, AND SAN LEANDRO, 1993, REVISED 1996.



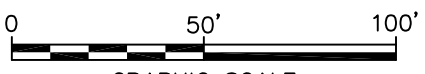
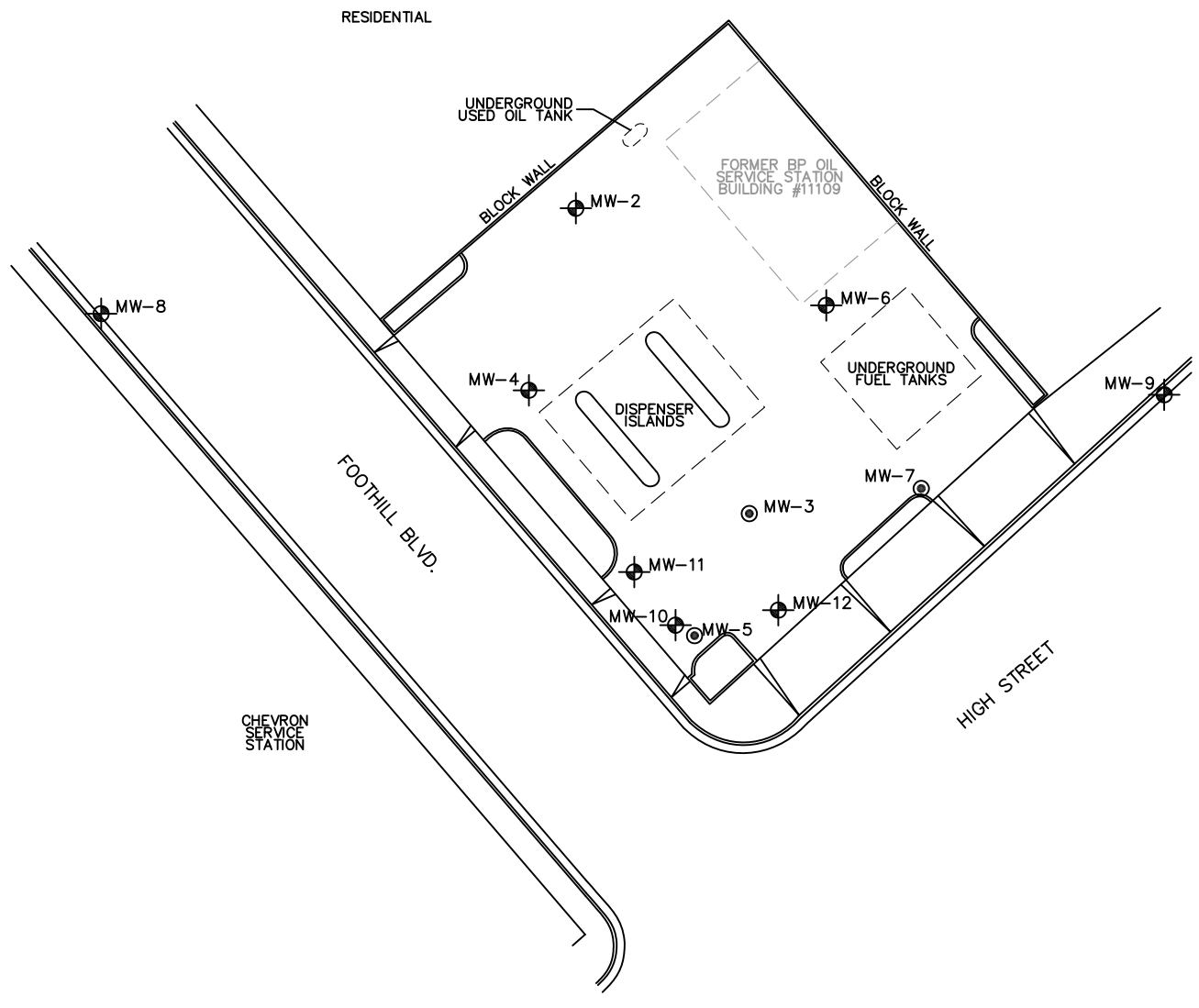
FORMER BP STATION #11109
 4280 FOOTHILL BOULEVARD
 OAKLAND, CALIFORNIA

SITE LOCATION MAP

FIGURE
1



CITY: PETALUMA, CA DIV/GROUP: ENV DB: J. HARRIS LD: PIC: PM: H. PHILLIPS TM: B. MCKENNA LYR: (Option=OFF=REF)
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PROJECTNAME: --
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- LEGEND
- MONITORING WELL
 - RECOVERY WELL

FORMER BP STATION #11109
4280 FOOTHILL BOULEVARD
OAKLAND, CALIFORNIA

SITE PLAN

NOTE: BASE MAP PROVIDED BY BROADBENT & ASSOCIATES, INC., DATED 10/26/2009, REFERENCE NO. 06-88-646, AT A SCALE OF 1"=40'.

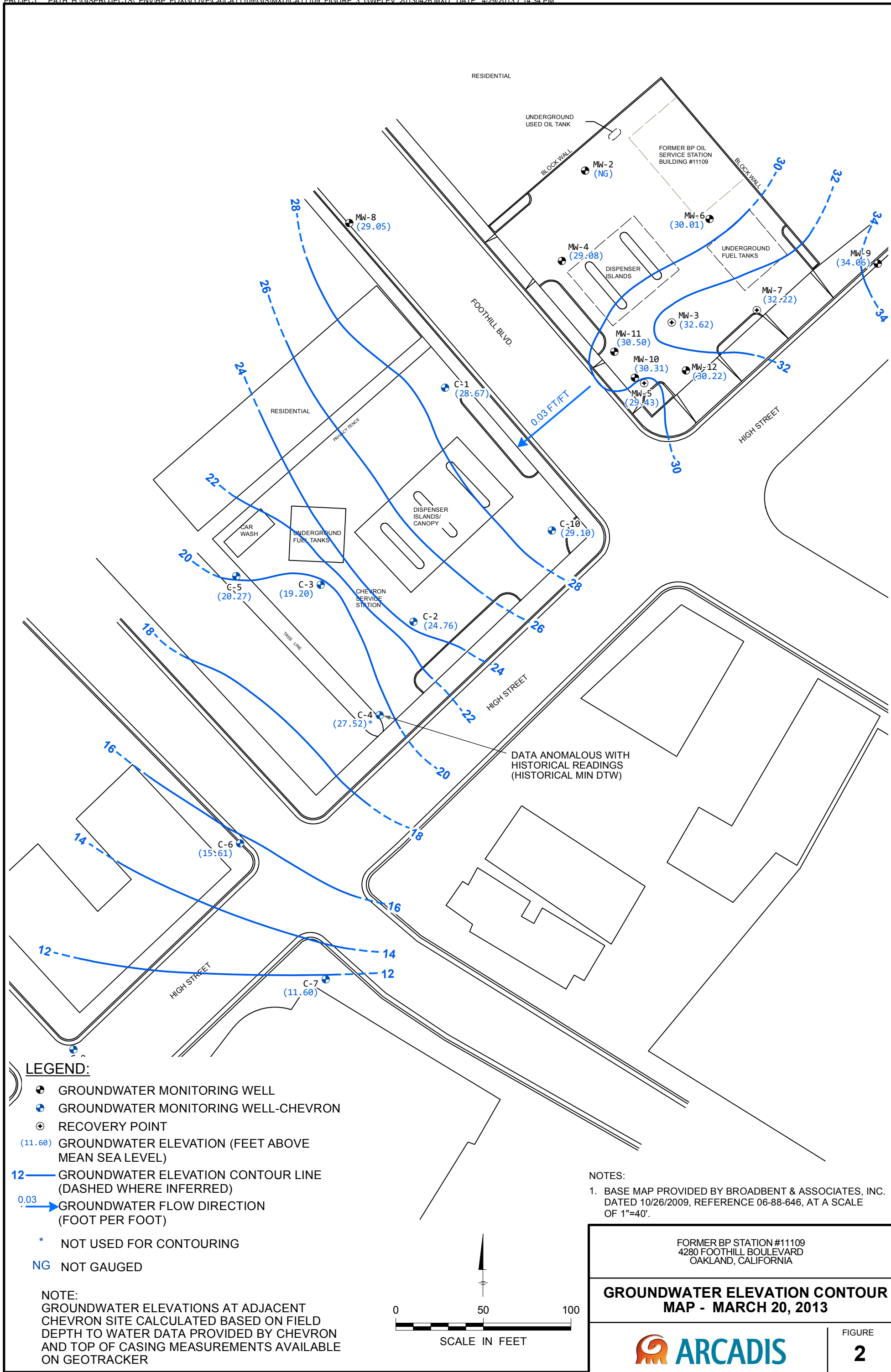


FIGURE
2



Appendix B

Groundwater Flow Direction and
Historical Gradients Table

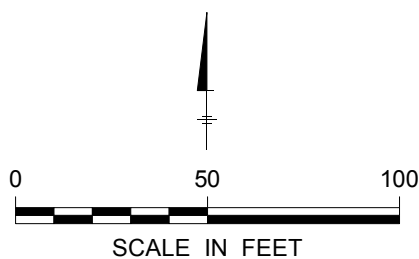


LEGEND:

- GROUNDWATER MONITORING WELL
- ⊕ GROUNDWATER MONITORING WELL-CHEVRON
- ⊙ RECOVERY POINT
- (11.60) GROUNDWATER ELEVATION (FEET ABOVE MEAN SEA LEVEL)
- GROUNDWATER ELEVATION CONTOUR LINE (DASHED WHERE INFERRED)
- 0.03 → GROUNDWATER FLOW DIRECTION (FOOT PER FOOT)
- * NOT USED FOR CONTOURING
- NG NOT GAUGED

NOTE:
 GROUNDWATER ELEVATIONS AT ADJACENT CHEVRON SITE CALCULATED BASED ON FIELD DEPTH TO WATER DATA PROVIDED BY CHEVRON AND TOP OF CASING MEASUREMENTS AVAILABLE ON GEOTRACKER

- NOTES:
1. BASE MAP PROVIDED BY BROADBENT & ASSOCIATES, INC. DATED 10/26/2009, REFERENCE 06-88-646, AT A SCALE OF 1"=40'.



FORMER BP STATION #11109
 4280 FOOTHILL BOULEVARD
 OAKLAND, CALIFORNIA

**GROUNDWATER ELEVATION CONTOUR
 MAP - MARCH 20, 2013**

ARCADIS

FIGURE
2

Table 2
Historical Groundwater Flow Direction and Gradient
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Date Measured	Approximate Gradient Direction	Approximate Gradient Magnitude (ft/ft)
3/6/2006	Southwest	0.05
9/5/2006	Southwest	0.05
2/21/2007	Southwest	0.02
9/7/2007	Southwest	0.03
3/6/2008	Southwest	0.01
9/3/2008	Southwest	0.006
3/4/2009	Southwest	0.02
9/30/2009	Northwest	0.07
10/28/2009	Northwest	0.04
3/23/2010	Northwest	0.03
6/10/2010	Northwest	0.02
9/16/2010	Northwest	0.07
2/23/2011	Northwest	0.04
9/28/2011	Northwest	0.02
3/8/2012	Northwest	0.06
9/5/2012	West-Northwest	0.04
3/20/2013	Southwest	0.03

Notes:

N/A = Not Available

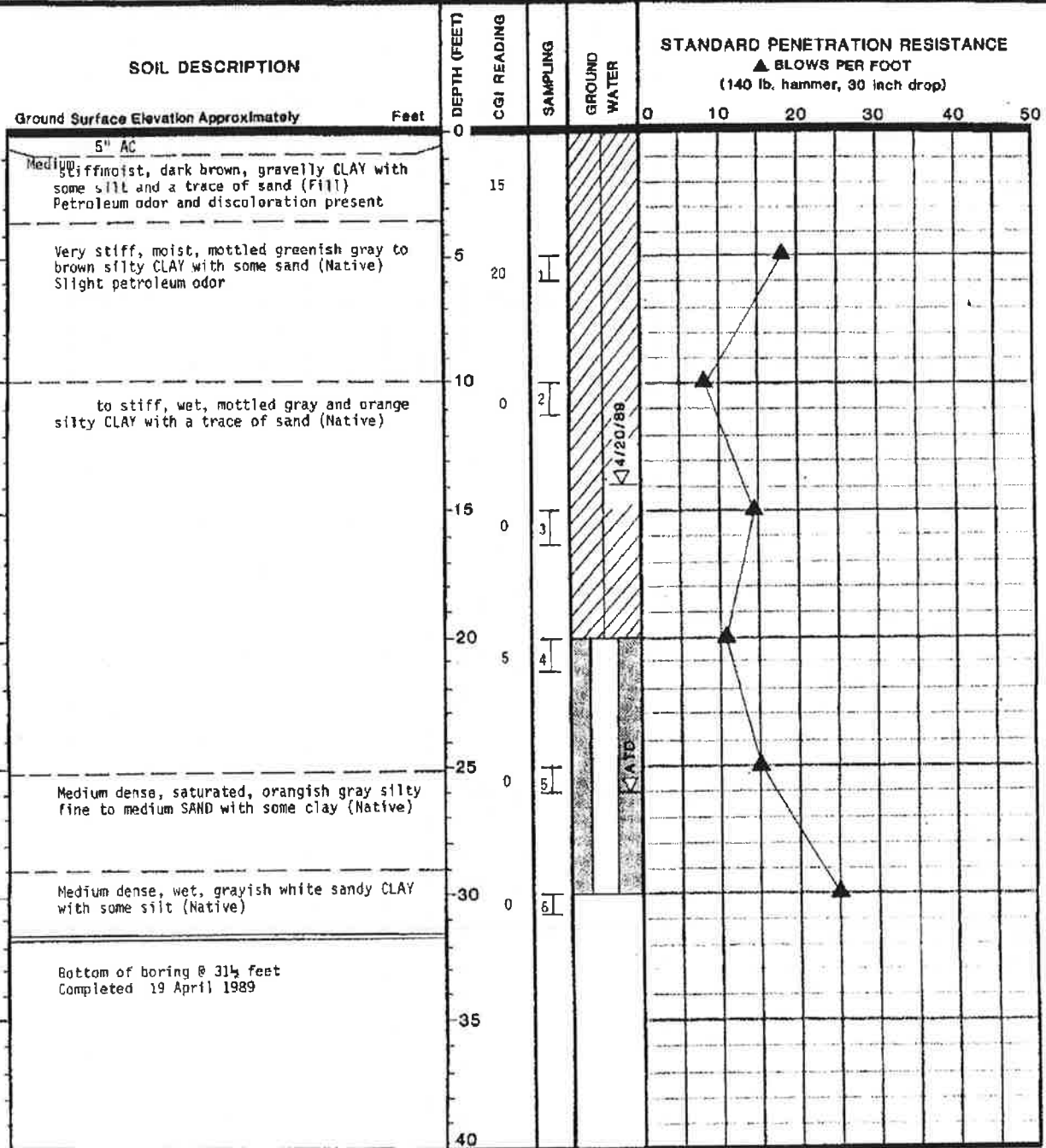
ft/ft = Feet per foot

Note: All data collected following April 2006 was collected by Broadbent & Associates, Inc. The data within this table collected prior to April 2006 was provided to Broadbent & Associates, Inc. by Atlantic Richfield Company and their previous consultants.



Appendix C

Soil Boring Logs



- SAMPLING**
- I 2" OD SPLIT SPOON SAMPLE
 - II 3" OD SHELBY SAMPLE
 - ⊠ 2.5" ID RING SAMPLE
 - B BULK SAMPLE
 - * SAMPLE NOT RECOVERED

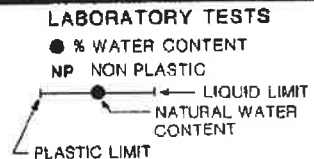
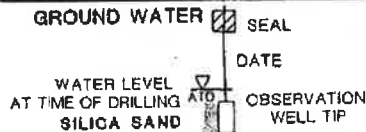


FIGURE 2

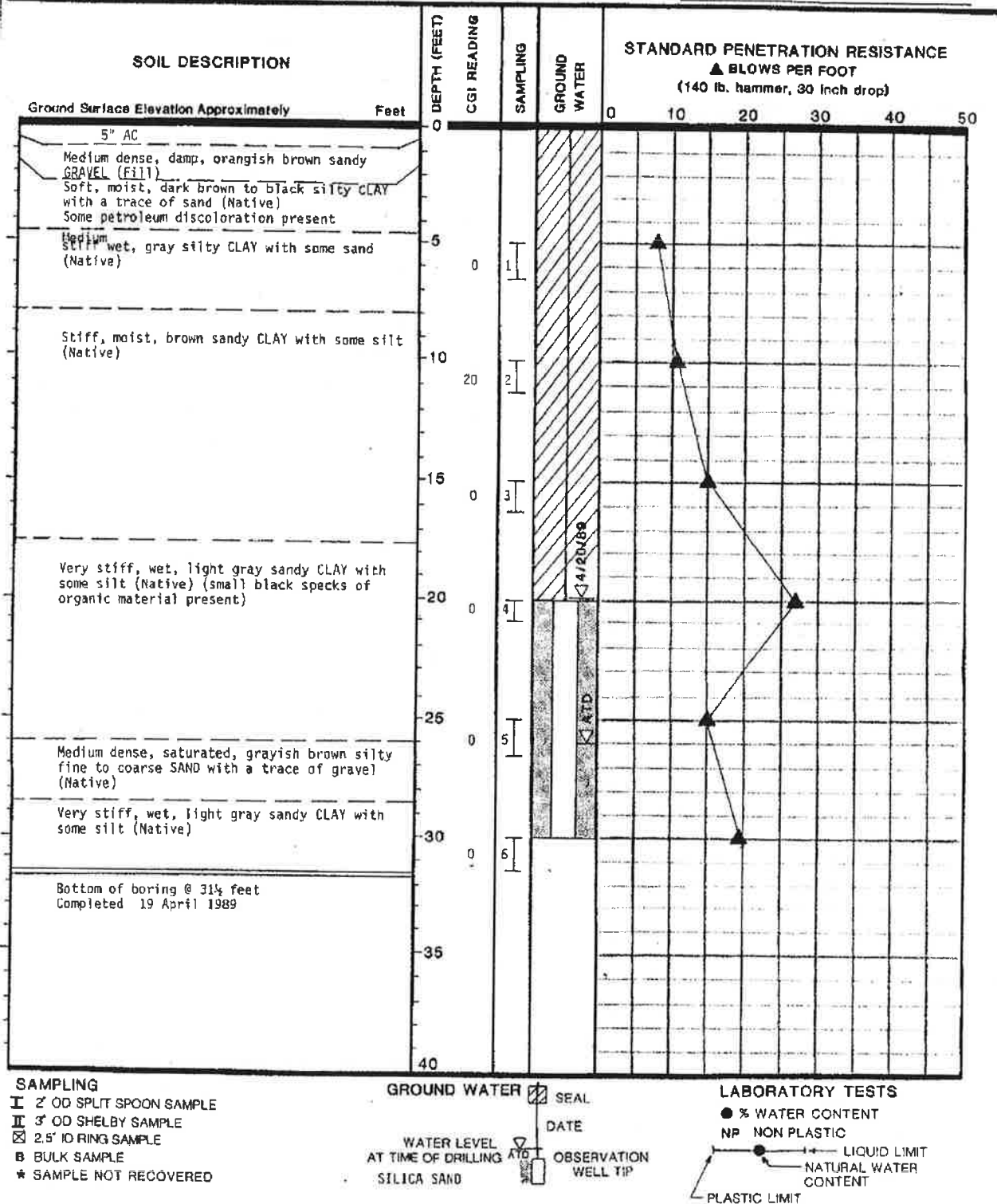


FIGURE 3

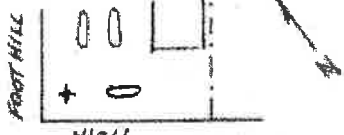


ALTON GEOSCIENCE

LOG OF EXPLORATORY BORING

PROJECT NO. 30-103 DATE 01/29/90 BORING NO. B-3
 CLIENT Mobil Oil Corporation Sheet 1
 LOCATION 4280 Foothill Blvd., Oakland of 1
 LOGGED BY B. Nagle DRILLER Bayland

Field location of boring:



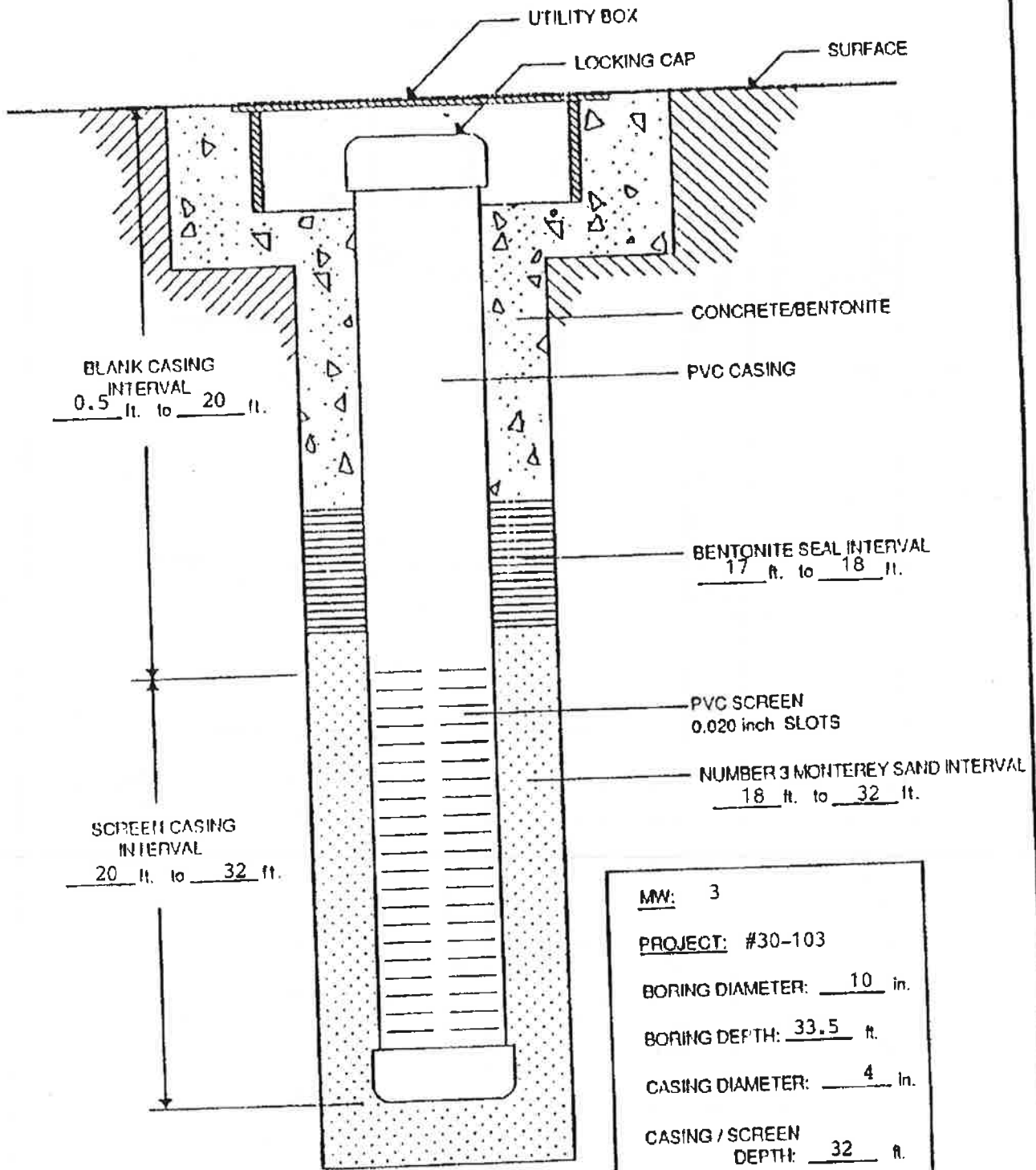
Ground Elev. Datum

Drilling method Hollow-stem auger
 Hole Dia. 10"

Casing Installation Date 4" perforated (0.020") pipe
32-20', #3 lonestar sand 33-18', bentonite
pellets 18-17'; cement seal to surface.

Blow Counts	PID QVA	Depth Feet	Soil Group Symbol (USCS)	Litho- graphic Symbol	Water Level		DESCRIPTION		
					6.72	20.28			
					Time 11:00	13:51			
					Date	1/29/90	2/05/90		
							3" asphalt; 6" baserock		
	25	2	CL				SILTY CLAY: Black, moist, high plasticity.		
		4					Appearance of fine to coarse grained sand; color change to dark brown.		
3, 4, 8	50	6	CL				SILTY CLAY: Mottled olive green/brown, moist, moderate plasticity, stiff; gravels up to 1/4".		
		8							
10, 13, 17	40	10	CL				SANDY CLAY: Brown, moist, low plasticity, very stiff; gravels up to 1/2".		
		12							
		14					Driller felt auger out of gravels at 13'		
6, 7, 9	40	16					SILTY CLAY: Tan, damp to moist, medium plasticity, stiff, blue-gray staining along occasional rootlets.		
		18							
		20	CL				Change to very moist, increase in 1/2" carbon granules.		
5, 9, 10	25	22							
		24							
4, 9, 15	50 100 In Shoe	26					SANDY CLAY: Blue-gray to tan, moist, low plasticity, stiff.		
		28	CL				Color change to light gray.		
		30							
5, 6, 9		30					Top of 32'-33 1/2' sample wet with sandy gravel stringers up to 2".		
7, 10, 14		32							
			CL				SILTY CLAY: Mottled brown and gray, damp, medium plasticity, very stiff.		
							Boring terminated at 33 1/2'. Free ground water encountered at approximately 31'.		

MONITORING WELL CONSTRUCTION DETAIL



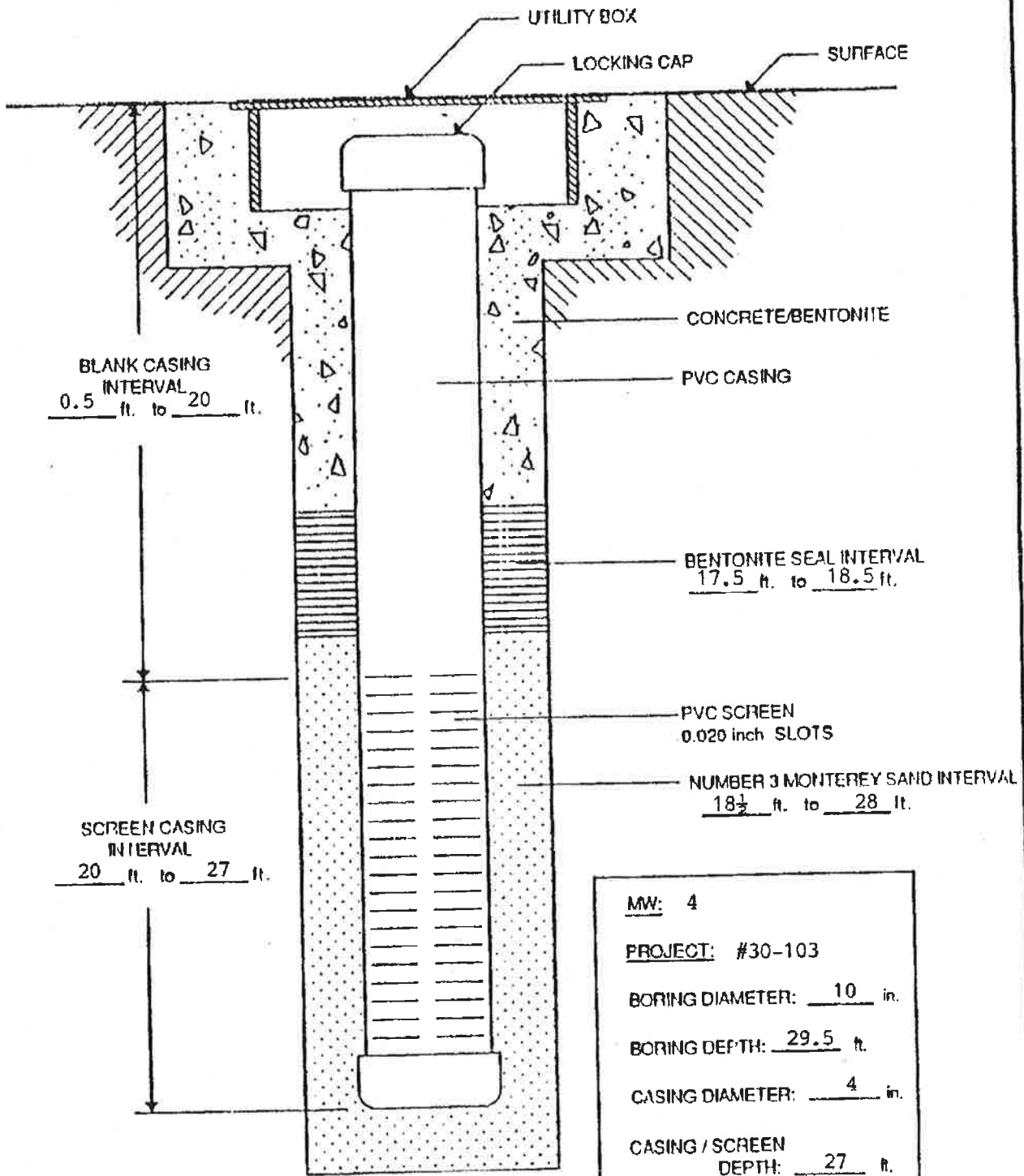
NOTE: DRAWING IS NOT TO SCALE

PROJECT #30-103



ALTON GEOSCIENCE
 1170 BURNETT AVE., STE 5
 CONCORD, CA. 94520

MONITORING WELL CONSTRUCTION DETAIL



NOTE: DRAWING'S NOT TO SCALE PROJECT #30-103



ALTON GEOSCIENCE
1170 BURNETT AVE., STE S
CONCORD, CA. 94520

**ALTON GEOSCIENCE
LOG OF EXPLORATORY
BORING**



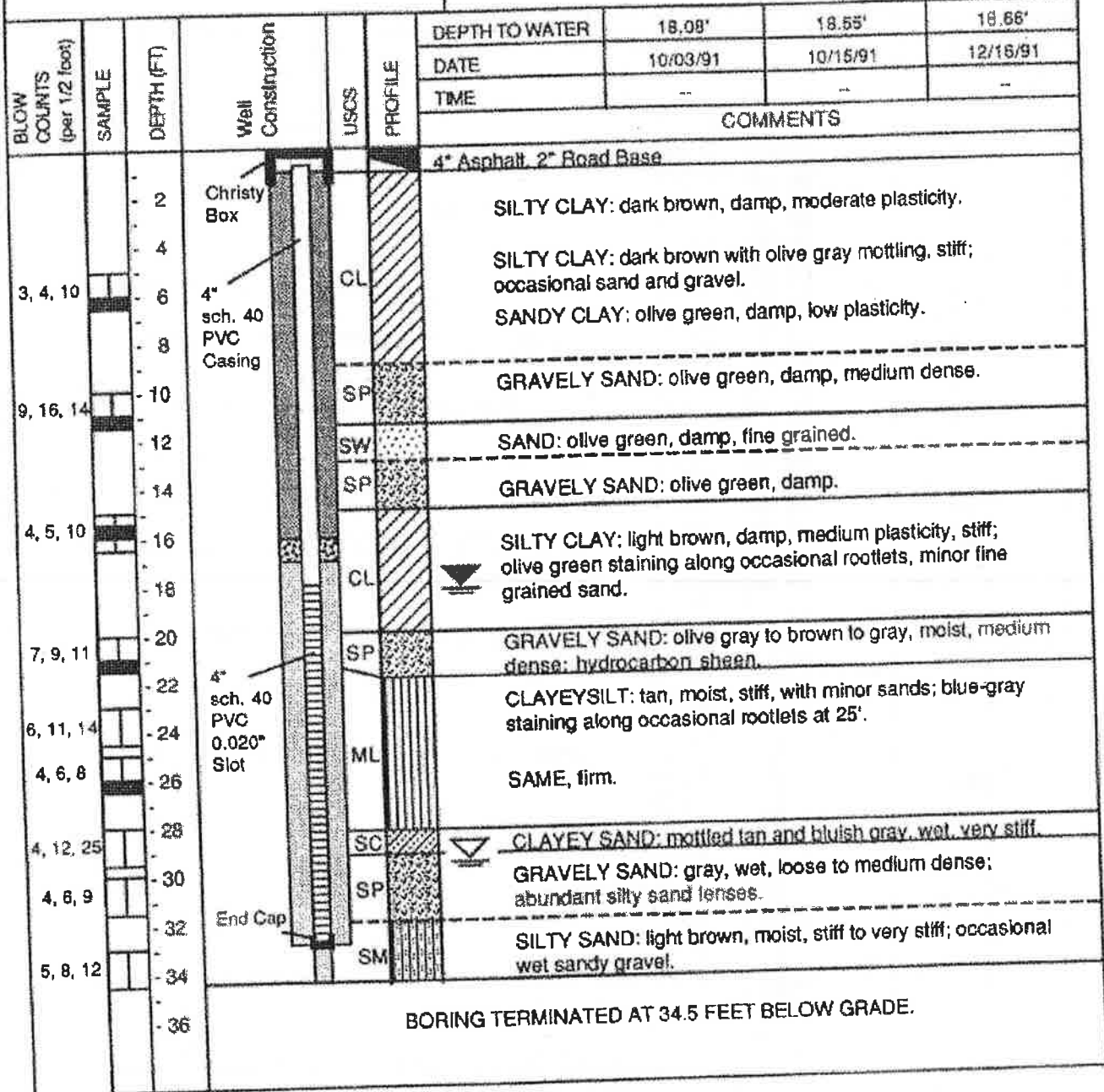
PROJECT NO. 30-0248 DATE DRILLED 9/09/91
 CLIENT BP Oil Co., Service Station No. 30-0248
 LOCATION 4280 Foothill Blvd., Oakland, CA
 LOGGED BY B. Nagle APPROVED BY _____

BORING NO. MW-5
 WELL NO. MW-5
 Page 1 of 1

FIELD SKETCH OF BORING LOCATION
 (SEE SITE PLAN)

TOP OF CASING ELEVATION 36.55

DRILLING METHOD C.M.E. 55, HSA HOLE DIAM. 10"
 SAMPLER TYPE California Modified Split-Spoon Sampler
 CASING DATA 4" diameter, Schedule 40 PVC, 18" blank, 15' slotted
 DRILLER Soils Exploration



**ALTON GEOSCIENCE
LOG OF EXPLORATORY
BORING**



PROJECT NO. 30-0248 DATE DRILLED 9/09/91
 CLIENT BP Oil Co., Service Station No. 30-0248
 LOCATION 4280 Foothill Blvd., Oakland, CA
 LOGGED BY B. Nagle APPROVED BY _____

BORING NO. MW-6
 WELL NO. MW-5
 Page 1 of 1

FIELD SKETCH OF BORING LOCATION
 (SEE SITE PLAN)

TOP OF CASING ELEVATION _____

DRILLING METHOD C.M.E. 55, HSA HOLE DIAM. 10"
 SAMPLER TYPE California Modified Split-Spoon Sampler
 CASING DATA 4" diameter, Schedule 40 PVC, 20' blank, 15' slotted
 DRILLER Soils Exploration

BLOW COUNTS (per 1/2 foot)	SAMPLE	DEPTH (FT)	Well Construction	USCS PROFILE	DEPTH TO WATER	20.73'	21.20'	21.12'
					DATE	10/03/91	10/15/91	12/16/91
					TIME	-	-	-
COMMENTS								
					4" Asphalt, 1" Road Base and Pea Gravel			
		2	Christy Box		SILTY CLAY: dark brown, damp.			
		4						
2, 3, 4		6	4" sch. 40 PVC Casing	CL	SILTY CLAY: tan, damp, firm, some sand, occasional gravel.			
		8			Abundant pea gravel at approximately 7 to 9 feet.			
		10						
2, 3, 3		12		SW	SAND: brown, damp, loose, fine grained, no fines; with thin clay bed.			
		14		SM	SILTY SAND: tan, mottled olive green, damp, occasional gravels to 1/2".			
2, 9, 10		16						
		18		CL	SILTY CLAY: tan, mottled olive green, damp, medium plasticity, stiff.			
4, 8, 14		20						
		22	4" sch. 40 PVC 0.020" Slot		CLAYEY SAND: tan, damp, medium dense, fine to coarse grained.			
4, 8, 12		26		SC	SAME: increase in sand content, bluish gray staining at 25.5' to 26'.			
		28						
7, 13, 16		30			SILTY - CLAYEY SAND: light tan, moist, medium dense.			
		32						
9, 17, 20		36	End Cap	SM	SILTY SAND: tan, wet, medium dense; with occasional gravel lenses.			
		38			BORING TERMINATED AT 36.5 FEET BELOW GRADE.			

**ALTON GEOSCIENCE
LOG OF EXPLORATORY
BORING**



PROJECT NO. 30-0248 DATE DRILLED 9/09/91
 CLIENT BP Oil Co., Service Station No. 30-0248
 LOCATION 4280 Foothill Blvd., Oakland, CA
 LOGGED BY B. Nagle APPROVED BY _____

BORING NO.
MW-7
WELL NO.
MW-7
Page 1 of 1

FIELD SKETCH OF BORING LOCATION
(SEE SITE PLAN)

DRILLING METHOD C.M.E. 55, HSA HOLE DIAM. 12"
 SAMPLER TYPE Continuous
 CASING DATA 6" diameter, Schedule 40 PVC, 19.5 blank, 15 slotted
 DRILLER Soils Exploration

TOP OF CASING ELEVATION _____

SAMPLE	DEPTH (FT)	Well Construction	USCS	PROFILE	DEPTH TO WATER	14.93'	15.16'	15.21'
					DATE	10/03/91	10/15/91	12/16/91
					TIME	-	-	-
					COMMENTS			
					3" Asphalt, 6" Road Base			
	2	Christy Box	CL		SILTY CLAY: dark brown, damp, medium plasticity.			
	4				CLAYEY SAND: bluish gray, damp; occasional gravel up to 1" diameter.			
	6	6" sch. 40 PVC Casing	SC		SAME: brown to bluish gray, damp; abundant gravel, occasional silty clay lens.			
	8							
	10							
	12		CL		SILTY CLAY: mottled bluish gray - orange brown, damp, medium plasticity; stained along rootlets.			
	14		SM		SILTY SAND: bluish gray to brown, damp.			
	16				SILTY CLAY: mottled bluish gray - orange brown, damp, medium plasticity; stiff.			
	18				SAME: mottled bluish gray - orange brown, damp, medium plasticity; stiff.			
	20		CL		SANDY CLAY: mottled bluish gray - olive green, damp, medium plasticity, very stiff.			
	22	6" sch. 40 PVC 0.020" Slot			SILTY CLAY: brown, damp, medium plasticity, very stiff.			
	24				SANDY CLAY: olive green, wet, low plasticity.			
	26		SC		CLAYEY SAND: brown, wet, medium dense.			
	28		CL		SANDY CLAY: tan, moist to wet, low plasticity.			
	30		SC		CLAYEY SAND: tan, wet, medium dense; some orange brown mottling.			
	32							
	34	End Cap	CL		SANDY CLAY: tan, moist to wet, low plasticity, stiff; increasing sand at 34', clay fractions along horizontal planes.			
	36				BORING TERMINATED AT 34.5 FEET BELOW GRADE.			

**ALTON GEOSCIENCE
LOG OF EXPLORATORY
BORING**



PROJECT NO. 30-0248 DATE DRILLED 9/11/91
 CLIENT BP Oil Co., Service Station No. 30-0248
 LOCATION 4280 Foothill Blvd., Oakland, CA
 LOGGED BY B. Nagle APPROVED BY _____

BORING NO.
 MW-8
 WELL NO.
 MW-8
 Page 1 of 1

FIELD SKETCH OF BORING LOCATION
 (SEE SITE PLAN)

TOP OF CASING ELEVATION _____

DRILLING METHOD C.M.E. 55, HSA HOLE DIAM. 9"
 SAMPLER TYPE California Modified Split-Spoon Sampler
 CASING DATA 2" diameter, Schedule 40 PVC, 19' blank, 13' slotted
 DRILLER Soils Exploration

BLOW COUNTS (per 1/2 foot)	SAMPLE	DEPTH (FT)	Well Construction	USCS	PROFILE	DEPTH TO WATER	22.37'	22.70'	22.47'
						DATE	10/03/91	10/15/91	12/16/91
						TIME	--	-	--
						COMMENTS			
						3" Asphalt, 4" Concrete, 12" Road Base and Pea Gravel			
						SILTY CLAY: dark brown, damp, moderate plasticity.			
1, 1, 2		2	Christy Box						
		4							
		6	2" sch. 40 PVC Casing						
		8							
1, 3, 5		10		CL		SANDY CLAY: mottled light - dark brown, moist, low plasticity, soft; abundant coarse grained sand.			
		12				SAME: light brown, moist, firm; fine grained sand.			
		14							
5, 6, 9		16				SILTY CLAY: brown, damp, low plasticity, stiff; abundant coarse grained sand.			
		18							
11, 7, 9		20		GC		CLAYEY GRAVEL: lens.			
		22	2" sch. 40 PVC 0.020" Slot	CL		SILTY CLAY: brown, wet, medium plasticity, stiff; abundant coarse grained sand.			
		24							
6, 10, 11		26		SC		CLAYEY SAND: light brown, wet, medium dense.			
		28							
5, 7, 9		30	End Cap	CL		SILTY CLAY: light brown, damp, medium plasticity, stiff; occasional coarse grained sand and black rootlets.			
						BORING TERMINATED AT 31.5 FEET BELOW GRADE.			
		32							
		34							
		36							
		38							

**ALTON GEOSCIENCE
LOG OF EXPLORATORY
BORING**



PROJECT NO. 30-0248 DATE DRILLED 9/11/91
 CLIENT BP Oil Co., Service Station No. 30-0248
 LOCATION 4280 Foothill Blvd., Oakland, CA
 LOGGED BY B. Nagle APPROVED BY _____

BORING NO. MW-9
 WELL NO. MW-9
 Page 1 of 1

FIELD SKETCH OF BORING LOCATION
 (SEE SITE PLAN)

DRILLING METHOD C.M.E. 55, HSA HOLE DIAM. 8"
 SAMPLER TYPE California Modified Split-Spoon Sampler
 CASING DATA 2" diameter, Schedule 40 PVC, 20' blank, 10' slotted
 DRILLER Soils Exploration

TOP OF CASING ELEVATION _____

BLOW COUNTS (per 1/2 foot)	SAMPLE	DEPTH (FT)	Well Construction	USCS	PROFILE	DEPTH TO WATER	14.12'	14.27'	14.18'
						DATE	10/03/91	10/15/91	12/16/91
						TIME	-	--	-
						COMMENTS			
						3" Asphalt, 6" Concrete, 12" Road Base and Pea Gravel			
		2	Christy Box	CL		SILTY CLAY: dark brown, damp, high plasticity, firm.			
2, 2, 4		4				SANDY CLAY: dark brown, damp, firm, soft; fine to coarse grained sand.			
		6	2" sch. 40 PVC Casing	GM		SANDY GRAVEL: olive green to brown, damp, medium dense; with clay matrix.			
9, 18, 14		8				SANDY CLAY: brown, damp, stiff; with abundant gravel. No gravels at 16'.			
		10	2" sch. 40 PVC 0.020" Slot	CL		SANDY CLAY: brown, damp, stiff; with abundant gravel. No gravels at 16'.			
3, 7, 11		12				SAME: very stiff, occasional carbonaceous gravels.			
		14	End Cap	CL		SAME: stiff, with orangish brown mottling, <i>SATURATED</i>			
4, 10, 14		16				SILTY CLAY: brown, damp, medium plasticity, very stiff; minor fine to coarse grained sand.			
		18	BORING TERMINATED AT 31.5 FEET BELOW GRADE.						
4, 6, 10		20							
		22							
		24							
		26							
		28							
5, 12, 13		30							
		32							
		34							
		36							
		38							

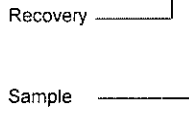
SOIL BORING LOG

Boring No. MW-10

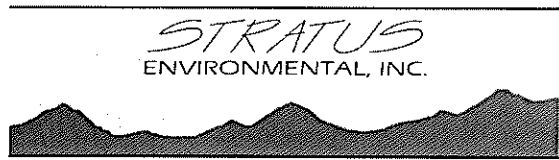
Sheet: 1 of 2

Client	Former BP Station 11109	Date	March 23, 2009
Address	4280 Foothill Boulevard Oakland, CA	Drilling Co.	Woodward Drilling rig type: BK-81
Project No.	E11109	Driller	Dave
Logged By:	Collin Fischer	Method	Hollow Stem Auger Hole Diameter: 10 inches
Well Pack	sand: 6 ft. to 30 ft. bent.: 4 ft. to 6 ft. grout: 0 ft. to 4 ft.	Sampler:	24-inch length split spoon
Well Construction	Casing Material: Schedule 40 PVC	Screen Interval:	7 ft. to 30 ft.
	Casing Diameter: 4 in.	Screen Slot Size:	0.020-in.
	Depth to GW: ▽ first encountered: 13' bgs.	static	▼

Sample Type	Sample No.	Blow Count		Sample		Well Details	Depth Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM)
		Time	Recov.	Time	Recov.					
							1		Cleared to 6.5' bgs. with air knife	
							2			
							3			
							4			
							5			
							6			
							7			
							8			
							9	ML	Clayey silt with sand, ML, dark grayish brown, moist, hard, low plasticity 60% silt, 30% clay, 10% medium grained sand	197
		9					10			
		14					11	SC	Clayey sand with gravel, SC, dark grayish brown, moist, very dense 65% coarse grained sand, 20% clay, 15% fine gravel	447
		17					12			
	MW-10 10'	20	0835	75			13	SM	Silty sand, SM, dark grayish brown, wet, very dense 85% medium to coarse grained sand, 15% silt	1027
		36					14			
	MW-10 12'	50/5"	0840	50			15			
		27					16			
		36					17	CL	Clay, CL, dark yellowish brown, moist, hard, high plasticity 100% clay	70.9
		42					18			
S	MW-10 14'	50/5"	0850	100			19	SC	Clayey sand with gravel, SC, dark grayish brown, wet, dense 65% medium to coarse grained sand, 20% clay, 15% fine gravel	366
		10					20			
		10								
		14								
	MW-10 16'	15	0855	0						
		12								
		12								
		20								
	MW-10 18'	27	0900	75						
		12								
		16								
		18								
S	MW-10 20'	20	0905	100						



Comments: Strong hydrocarbon odor from surface to total depth.



SOIL BORING LOG

Boring No. MW-10

Sheet: 2 of 2

Client	Former BP Station 11109	Date	March 23, 2009
Address	4280 Foothill Boulevard	Drilling Co.	Woodward Drilling rig type: BK-81
	Oakland, CA	Driller	Dave
Project No.	E11109	Method	Hollow Stem Auger Hole Diameter: 10 inches
Logged By:	Collin Fischer	Sampler:	24-inch length split spoon
Well Pack	sand: 6 ft. to 30 ft. bent.: 4 ft. to 6 ft. grout: 0 ft. to 4 ft.	Well Construction	Casing Material: Schedule 40 PVC Casing Diameter: 4 in. Screen Interval: 7 ft. to 30 ft. Screen Slot Size: 0.020-in.
		Depth to GW:	▽ first encountered: 13' bgs. static ▼

Type	Sample		Blow Count	Sample		Well Details	Depth Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM)
	No.	Time		Recov.						
			12							
			25				21	SC	Clayey sand with gravel, SC, dark grayish brown, wet, very dense 65% coarse grained sand, 25% clay, 15% fine gravel	176
	MW-10 22'		32				22			
			36	0915	75		23			70.8
			17				24	CL	Clay, CL, dark yellowish brown, moist, hard, high plasticity 100% clay	
	MW-10 24'		20				25			
			26	0920	75		26			245
			10				27			
S	MW-10 26'		18				28	SC	Sandy clay, CL, dark grayish brown, moist, hard, medium plasticity 70% clay, 30% fine grained sand	43.2
			20				29			
	MW-10 28'		23	0935	100		30	CL	Clayey sand, SC, grayish brown, moist, dense 70% very fine grained sand, 30% clay	33.8
			12							
			12							
S	MW-10 30'		15	0940	100				Silty clay, CL, dark grayish brown, moist, hard, medium plasticity 60% clay, 40% silt	
			18							
							31			
							32			
							33			
							34			
							35			
							36			
							37			
							38			
							39			
							40			

Comments:

STRATUS
ENVIRONMENTAL, INC.

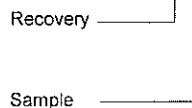
SOIL BORING LOG

Boring No. MW-11

Sheet: 1 of 2

Client	Former BP Station 11109	Date	March 23, 2009
Address	4280 Foothill Boulevard Oakland, CA	Drilling Co.	Woodward Drilling rig type: BK-81
Project No.	E11109	Driller	Dave
Logged By:	Collin Fischer	Method	Hollow Stem Auger Hole Diameter: 10 inches
		Sampler:	24-inch length split spoon
Well Pack	sand: 6 ft. to 30 ft. bent.: 4 ft. to 6 ft. grout: 0 ft. to 4 ft.	Well Construction	Casing Material: Schedule 40 PVC Screen Interval: 7 ft. to 30 ft. Casing Diameter: 4 in. Screen Slot Size: 0.020-in. Depth to GW: ▽ first encountered: 13'bgs. static ▼

Sample Type	Sample No.	Blow Count	Sample		Well Details	Depth Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM)
			Time	Recov.					
						1		Cleared to 6.5' bgs. with air knife	
						2			
						3			
						4			
						5			
						6			
						7			
						8			
		12				9	ML	Clayey silt with gravel, ML, dark grayish brown, moist, hard, low plasticity 60% silt, 25% clay, 15% fine gravel	155
S	MW-11 10'	23	1305	50		10			
		16				11	CL	Clay with gravel, CL, dark grayish brown, moist, hard, low plasticity 70% clay, 30% medium to coarse grained sand	118
		23				12			
	MW-11 12'	32	1315	75		13	▽ SM	Silty sand with gravel, SM, dark grayish brown, wet, very dense 60% medium to coarse grained sand, 25% silt, 15% medium gravel	51.3
		26				14			
	MW-11 14'	32	1320	100		15		Silty sand with gravel, SM, dark grayish brown, wet, medium dense 60% medium to coarse grained sand, 25% silt, 15% medium gravel	205
		7				16		Sandy clay, CL, dark grayish brown, moist, very stiff, medium plasticity 75% clay, 25% coarse grained sand	
S	MW-11 16'	12	1330	100		17	CL	Clay with gravel, CL, dark yellowish brown, moist, hard, medium plasticity 85% clay, 15% fine to medium gravel	51.1
		10				18			
	MW-11 18'	18	1335	100		19		Sandy clay, CL, dark yellowish brown, moist, very stiff, medium plasticity 80% clay, 20% coarse grained sand	42.8
		12				20			
	MW-11 20'	15							
		16	1340	100					



Comments: Strong hydrocarbon odor from surface to total depth.



SOIL BORING LOG

Boring No. MW-11

Sheet: 2 of 2

Client	Former BP Station 11109	Date	March 23, 2009
Address	4280 Foothill Boulevard	Drilling Co.	Woodward Drilling rig type: BK-81
	Oakland, CA	Driller	Dave
Project No.	E11109	Method	Hollow Stem Auger Hole Diameter: 10 inches
Logged By:	Collin Fischer	Sampler:	24-inch length split spoon
Well Pack	sand: 6 ft. to 30 ft. bent: 4 ft. to 6 ft. grout: 0 ft. to 4 ft.	Well Construction	Casing Material: Schedule 40 PVC Casing Diameter: 4 in. Screen Interval: 7 ft. to 30 ft. Screen Slot Size: 0.020-in.
		Depth to GW:	▽ first encountered: 13'bgs. static ▼

Sample		Blow Count	Sample		Well Details	Depth Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM)
Type	No.		Time	Recov.					
		30			[Well Diagram]	21	CL		397
		32					22	SC	Clayey sand with gravel, SC, dark yellowish brown, moist, very dense 65% medium graiend sand, 25% clay, 15% fine gravel
	MW-11 22'	50/4"	1345	100		23			1397
		25				24	SC	Clayey sand with gravel, SC, dark yellowish brown, wet, very dense 60% medium grained sand, 20% clay, 20% fine gravel	
S	MW-11 24'	32	1355	75		25			97.9
		13				26	CL	Sandy clay, CL, dark grayish brown, moist hard, medium plasticity 70% clay, 30% fine frained sand	
	MW-11 26'	26	1400	100		27			473
		15				28	SC	Clayey sand, SC, dark grayish brown, moist to wet, dense 60% fine grained sand, 40% clay	
	MW-11 28'	21	1405	100		29			214
		12				30	CL	Clay, CL, dark grayish brown, moist to wet, hard, medium plasticity 100% clay	
S	MW-11 30'	26	1425	100		31			
		18				32			
		20				33			
						34			
						35			
						36			
						37			
						38			
						39			
						40			

Comments:

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ENVIRONMENTAL, INC.

SOIL BORING LOG

Boring No. MW-12

Sheet: 1 of 2

Client	Former BP Station 11109	Date	March 24, 2009
Address	4280 Foothill Boulevard Oakland, CA	Drilling Co.	Woodward Drilling rig type: BK-81
Project No.	E11109	Driller	Dave
Logged By:	Collin Fischer	Method	Hollow Stem Auger Hole Diameter: 10 inches
		Sampler:	24-inch length split spoon
Well Pack	sand: 6 ft. to 30 ft. bent.: 4 ft. to 6 ft. grout: 0 ft. to 4 ft.	Well Construction	Casing Material: Schedule 40 PVC Screen Interval: 7 ft. to 30 ft. Casing Diameter: 4 in. Screen Slot Size: 0.020-in. Depth to GW: ▽ first encountered: 13' bgs. static ▼

Sample Type	Sample No.	Blow Count	Sample		Well Details	Depth Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM)
			Time	Recov.					
						1		Cleared to 6.5' bgs. with air knife	
						2			
						3			
						4			
						5			
						6			
						7			
						8			
		10				9		Clayey silt, ML, dark grayish brown, moist, very stiff, low plasticity 60% silt, 40% clay	
		11				10	ML		
S	MW-12 10'	16	0835	50		11		Clayey silt with sand, ML, dark grayish brown, moist, hard, low plasticity 60% silt, 30% clay, 10% fine grained sand	
		10				12			
		15				13	▽ SC	Clayey sand with gravel, SC, dark grayish brown, moist, very dense 65% coarse grained sand, 20% clay, 15% fine to medium gravel	
		50/6"				14			
		-	0840	67		15		Clay trace gravel, CL, dark grayish brown, moist, hard, high plasticity 95% clay, 5% fine gravel	
		28				16			
		50/6"				17			
		-	0845	100		18		Clay, CL, dark brown, moist, hard, high plasticity, 100% clay	
		-				19	CL		
		12				20		Silty clay with sand, CL, dark yellowish brown, moist, hard, medium plasticity 60% clay, 25% silt, 15% fine grained sand	
		15				21			
S	MW-12 16'	23	0850	100		22			
		19				23			
		20				24			
		20				25			
		24	0900	100		26			
		14				27			
		18				28			
		20				29			
		21	0905	100		30			

Recovery _____

Sample _____

Comments: Strong hydrocarbon odor from surface to total depth.
PID readings not available.

STRATUS
ENVIRONMENTAL, INC.

SOIL BORING LOG

Boring No. MW-12

Sheet: 2 of 2

Client	Former BP Station 11109	Date	March 24, 2009
Address	4280 Foothill Boulevard Oakland, CA	Drilling Co.	Woodward Drilling rig type: BK-81
Project No.	E11109	Driller	Dave
Logged By:	Collin Fischer	Method	Hollow Stem Auger Hole Diameter: 10 inches
Well Pack	sand: 6 ft. to 30 ft. bent.: 4 ft. to 6 ft. grout: 0 ft. to 4 ft.	Well Construction	Casing Material: Schedule 40 PVC Screen Interval: 7 ft. to 30 ft. Casing Diameter: 4 in. Screen Slot Size: 0.020-in.
		Depth to GW:	▽ first encountered static ▼

Sample Type	Sample No.	Blow Count	Sample		Well Details	Depth Scale	Lithologic Column	Descriptions of Materials and Conditions	PID (PPM)
			Time	Recov.					
		15					CL		
		19				21			
S	MW-12 22'	42	0910	100		22	SC	Clayey sand with gravel, SC, dark grayish brown, wet, very dense 65% coarse grained sand, 25% clay, 15% fine gravel	
		15				23			
		20				24			
	MW-12 24'	32	0920	0		25	CL		
		12				26			
		12				27			
	MW-12 26'	17	0930	100		28	CL	Sandy clay, CL, dark grayish brown, wet, very stiff, medium plasticity 70% clay, 30% fine grained sand	
		10				29			
		10				30			
	MW-12 28'	20	0940	100		31	SC	Clayey sand, SC, dark grayish brown, wet, dense 70% very fine grained sand, 30% clay	
		17				32			
		20				33			
S	MW-12 30'	24	0950	100		34	SC	Clayey sand, SC, dark grayish brown, wet, dense 60% very fine grained sand, 40% clay	
		23				35			
						36			
						37			
						38			
						39			
						40			

Comments:

STRATUS
ENVIRONMENTAL, INC.



Appendix D

Historical Soil Data

TABLE 2

Summary of Analytical Results of Soil Samples
 BP Oil Company Service Station No. 11109
 4280 Foothill Boulevard, Oakland, California

Project No.: 30-0248

Concentrations in parts per million (ppm)

SAMPLE ID	DATE OF SAMPLING	SAMPLE DEPTH (feet)	TPH-G	B	T	E	X	TOTAL ORGANIC PB	LAB
MW-8	09/11/91	16	ND<1	ND<.003	ND<.003	ND<.003	ND<.003	---	SAL
MW-9	09/11/91	10.5	ND<1	ND<.003	ND<.003	ND<.003	ND<.003	---	SAL
MW-9	09/11/91	16	ND<1	ND<.003	ND<.003	ND<.003	ND<.003	---	SAL
MW-9	09/11/91	21	ND<1	ND<.003	ND<.003	ND<.003	ND<.003	---	SAL

AGS - 91

AGS-91

EXPLANATION OF ABBREVIATIONS:

TPH-G :Total Petroleum Hydrocarbons as Gasoline
 B :Benzene
 T :Toluene
 E :Ethylbenzene
 X :Xylenes
 ND :Not detected above given detection limits
 SAL :Superior Analytical Lab

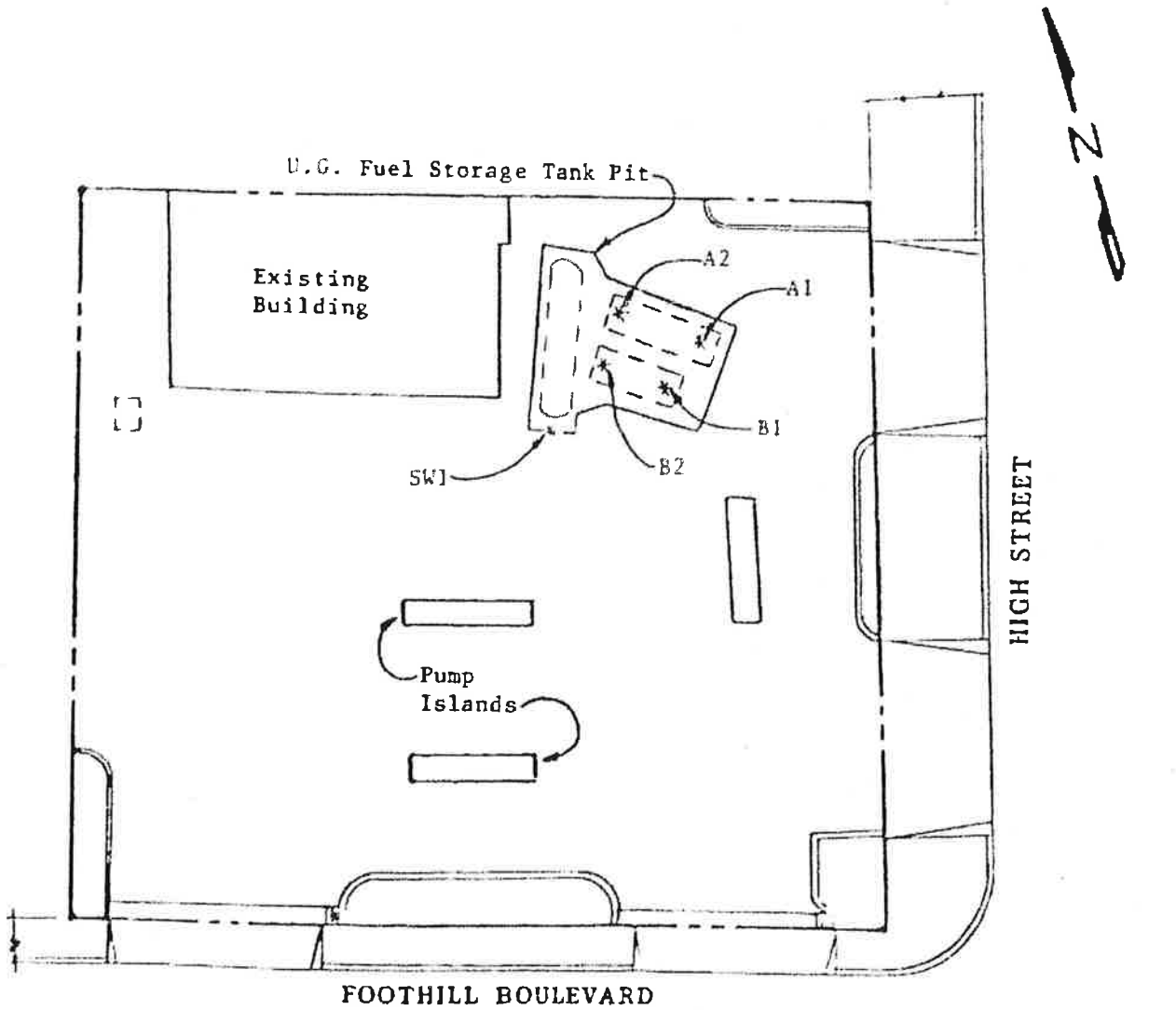
Source: Alton, March 24, 1992a

Table C-3
 Page 2 of 2



KAPREALIAN ENGINEERING, INC.
Consulting Engineers

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

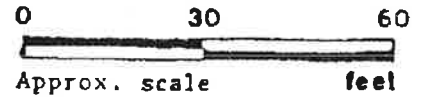


SITE PLAN

Figure 1

LEGEND

* Sample Point Location



BP Service Station
4280 Foothill Boulevard
Oakland, CA

KEI-J90-0911.R1
 November 1, 1990

TABLE 1

SUMMARY OF LABORATORY ANALYSES
 SOIL SAMPLES COLLECTED FROM THE FUEL TANK PIT
 AND PRODUCT DISPENSER AREA

(Collected between September 14 to 28,
 and on October 16, 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	ND	0.10	0.006	ND	0.006
A2	14.5	ND	ND	0.0080	ND	ND
B1*	14.5	ND	0.034	0.014	ND	ND
B2*	14.5	ND	0.0060	ND	ND	ND
SW1	12	ND	0.018	ND	ND	ND
SW2-19	19	ND	0.12	ND	0.071	0.10
SW3-9.5	9.5	ND	0.051	ND	ND	0.0050
SW4-16	16	140	0.89	0.79	0.44	4.4
SW5	17	4.2	0.040	0.029	0.058	0.069
SW6-11	11	16	0.033	0.16	0.38	0.097
A3-16	16	4.3	0.044	0.010	0.22	0.20
A4-16.5	16.5	5.3	0.058	0.026	ND	0.19
A4-19	19	ND	0.010	ND	0.037	0.050
B3-14.5	14.5	910	6.0	13	82	19
B3-24	24	91	1.7	0.46	ND	0.17
D1-4	4	ND	ND	ND	ND	ND
D2-11	11	31	0.38	1.2	2.8	0.60
D3**	4	ND	ND	0.011	ND	ND
D4**	6	1.9	0.054	0.094	0.20	0.046
D5**	4	6.8	0.0010	0.028	0.018	0.045
D6**	5.5	15	0.51	0.038	1.7	0.62

1400 test

1990

* Total lead for B1 and B2 were detected at 10 ppm and 12 ppm, respectively.

** Total lead for D3, D4, D5 and D6 were detected at 2.5 ppm, 4.5 ppm, 4.0 ppm and 2.0 ppm, respectively.

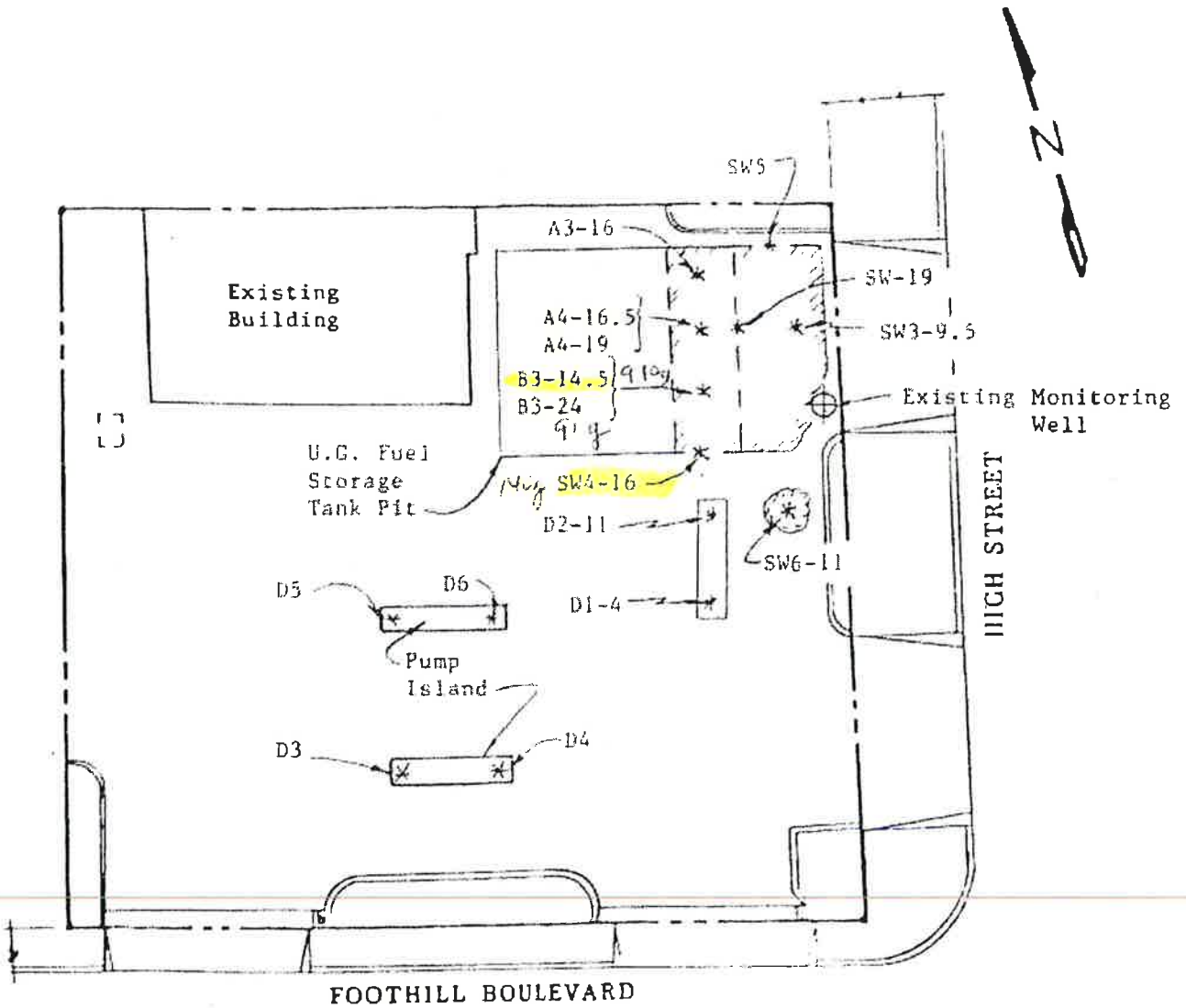
ND = Non-detectable.

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



KAPREALIAN ENGINEERING, INC.
Consulting Engineers

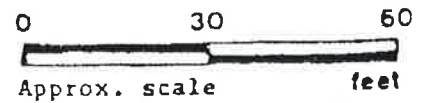
PO BOX 996 • BENICIA, CA 94510
(707) 746-6915 • (707) 746-6916 • FAX: (707) 746-5581



SITE PLAN
Figure 2

LEGEND

- * Sample Point Location
- ▣ Additional Excavation



BP Service Station
4280 Foothill Boulevard
Oakland, CA

1180 RZA



GTEL

ENVIRONMENTAL
LABORATORIES, INC.

Western Region
4080-C Pike Ln., Concord, CA 94520
(415) 685-7852
In CA: (800) 544-3422
Outside CA: (800) 423-7143

04/25/89 KF

PAGE 1 OF 1

WORK ORD#: C904459

CLIENT: STEVE EVANS/SHAUN DONNAN
RITTENHOUSE-ZEMAN & ASSOC.
1400 140TH AVENUE NE
BELLEVUE, WA 98005

PROJECT#: SEA-0101-5
LOCATION: OAKLAND, CA

SAMPLED: 04/19/89 BY: S. EVANS
RECEIVED: 04/21/89
ANALYZED: 04/24/89 BY: K. PATTON

MATRIX: SOIL W-6095
UNITS: mg/Kg (ppm)

PARAMETER	MDL	SAMPLE #	01	02
		I.D.	S-1A	S-2A
Benzene	0.5		<0.5	<0.5
Toluene	0.5		<0.5	<0.5
Ethylbenzene	0.5		<0.5	<0.5
Xylenes	0.5		<0.5	<0.5
Total BTEX	0.5		<0.5	<0.5

MDL = Method Detection Limit; compound below this level would not be detected.
Results rounded to two significant figures.

METHOD: Modified EPA 5030/8020

TABLE 1.

Emma P. Popek

EMMA P. POPEK, Laboratory Director

1986 R3A



GTEL

ENVIRONMENTAL
LABORATORIES, INC.

Western Region
4080-C Pike Ln., Concord, CA 94520
(415) 685-7852
In CA: (800) 544-3422
Outside CA: (800) 423-7143

04/26/89MT

Page 1 of 1

WORK ORD#: C904461
CLIENT: STEVE EVANS/SHAUN DONNAN
RITTENHOUSE-ZEMAN & ASSOC.
1400 140TH AVENUE NE
BELLEVUE, WA 98005

PROJECT#: SEA-0101-7
LOCATION: OAKLAND, CA

SAMPLED: 04/19/89 BY: S. EVANS
RECEIVED: 04/20/89
ANALYZED: 04/24/89 BY: T. ALUSI
J. FLORO

MATRIX: Soil
UNITS: mg/Kg (ppm) JOB# 6095

PARAMETER	MDL	SAMPLE #	01	02		
			I.I.D.	S-1B	S-2B	

Total Petroleum Hydrocarbons	5	15	65
------------------------------	---	----	----

MDL = Method Detection Limit; compound below this level would not be detected.
Results rounded to two significant figures.

METHOD: APHA Standard Methods 503D/E

Table 2

Emma P. Popek
EMMA P. POPEK, Laboratory Director

1484 RZA



GTEL

ENVIRONMENTAL
LABORATORIES, INC.

Western Region
4080-C Pike Ln., Concord, CA 94520
(415) 685-7852
In CA: (800) 544-3422
Outside CA: (800) 423-7143

04/25/89 JP

PAGE 1 OF 1

WORK ORD#: C904460

CLIENT: STEVE EVANS/SHAUN DONNAN
RITTENHOUS-ZEMAN & ASSOCIATES, INC.
1400 140TH AVENUE
BELLEVUE, WASHINGTON 98005

PROJECT#: SEA-0101-6

LOCATION: OAKLAND, CA

SAMPLED: 04/19/89

BY: STEVE EVANS

RECEIVED: 04/20/89

ANALYZED: 04/23/89

BY: C. MANUEL

MATRIX: WATER

W-6095

UNITS: ug/L (ppb)

PARAMETER	MDL	SAMPLE #	Q1			
		I. D.	S-3A			
Benzene	0.5		860			
Toluene	0.5		160			
Ethylbenzene	0.5		570			
Xylenes	0.5		1200			
Total BTEX	0.5		2800			

MDL = Method Detection Limit; compound below this level would not be detected.
Results rounded to two significant figures.

METHOD: Modified EPA 5030/8020

TABLE 3

EMMA P. POPEK, Director

TABLE 2

Summary of Analytical Results of Soil Samples
 BP Oil Company Service Station No. 11109
 4280 Foothill Boulevard, Oakland, California

Project No.: 30-0248

Concentrations in parts per million (ppm)

SAMPLE ID	DATE OF SAMPLING	SAMPLE DEPTH (feet)	TPH-G	B	T	E	X	TOTAL ORGANIC PB	LAB
MW-3	01/29/90	5	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	
MW-3	01/29/90	10	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-3	01/29/90	15	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-3	01/29/90	20	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-3	01/29/90	25	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-3	01/29/90	29	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-4	01/30/90	5	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	
MW-4	01/30/90	10	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-4	01/30/90	15	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-4	01/30/90	20	ND<1	ND<.005	ND<.005	ND<.005	ND<.005	---	SAL
MW-4	01/30/90	25	16	ND<.050	ND<.050	ND<.050	ND<.005	---	SAL
MW-4	01/30/90	29	ND<1	ND<.005	ND<.005	ND<.050	.170	---	SAL
MW-5	09/09/91	6	ND<1					---	SAL
MW-5	09/09/91	11	4400	.003	ND<.003	ND<.003	.003	ND<2	SAL
MW-5	09/09/91	15.5	240	8.5	58	55	260	ND<2	SAL
MW-5	09/09/91	21	6100	1	1.4	2.5	9.5	ND<2	SAL
MW-5	09/09/91	26	89	.23	.390	.5	120	---	SAL
MW-6	09/09/91	16	ND<1	ND<.003	ND<.003	ND<.003		---	SAL
MW-6	09/09/91	21	ND<1	ND<.003	ND<.003	ND<.003	ND<.003	---	SAL
MW-6	09/09/91	25.5	270	ND<.030	.780	.340	.510	---	SAL
MW-7	09/10/91	6	310	ND<.150	.860	.690	1.6	ND<2	SAL
MW-7	09/10/91	9.5	11	ND<.003	.035	.013	.028	ND<2	SAL
MW-7	09/10/91	13	38	.120	.110	.089	.120	ND<2	SAL
MW-7	09/10/91	18.5	17	.053	.035	.160	.098	ND<2	SAL
MW-7	09/10/91	24	ND<1	.003	ND<.003	.003	ND<.003	ND<2	SAL

AGS

AGS

AGS 91

AGS 91

AGS - 91

Source: Alton, March 24, 1992a

Table C-3
 Page 1 of 2

The laboratory analytical reports for soil boring samples, including chain-of-custody documentation, are provided in Appendix B. Soil laboratory analytical results are also summarized in tabular format below.

Soil Boring Samples - Laboratory Analytical Results (mg/kg)

Sample ID	GRO	B	T	E	X	MTBE	TBA	DIPE
MW-10 14'	420	2.4	5.1	20	84	<0.50	<5.0	<1.0
MW-10 20'	3,900	11	31	48	230	<1.0	<10	<2.0
MW-10 26'	1,300	0.67	0.43	2.1	2.9	<0.10	<1.0	<0.20
MW-10 30'	21	0.48	0.020	0.033	0.037	<0.0010	0.065	0.0035
MW-11 10'	55	<0.10	<0.10	1.6	0.21	<0.10	<1.0	<0.20
MW-11 16'	<0.50	0.0014	0.0013	0.0051	0.0076	0.0028	<0.010	<0.0020
MW-11 24'	6,500	22	86	95	460	<2.0	<20	<4.0
MW-11 30'	15	0.58	0.44	0.69	3.1	<0.10	<1.0	<0.20
MW-12 10'	8.5	0.025	0.0019	0.013	0.0039	<0.0010	0.014	<0.0020
MW-12 16'	9.8	0.065	0.012	1.3	0.40	<0.0010	<0.010	<0.0020
MW-12 22'	1,300	2.6	0.94	24	6.7	<0.20	<2.0	<0.40
MW-12 30'	0.76	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010	0.013	<0.0020

Hydrocarbon concentrations detected above laboratory reporting limits are represented with bold-typed font. Concentrations of EDB, ETBE, TAME, and 1,2-DCA are not included in the above table as the results for these constituents were below their respective laboratory reporting limits. No significant irregularities were reported during laboratory analysis of the soil boring samples. From review of the tabulated data and historic depths to ground water as low as 30 ft bgs, it appears that a 20 ft thick 'smear zone' may be present. Concentrations do dramatically decrease down to the historic low ground-water level of 30.00 ft bgs (MW-5, 4/7/1994), approximately defining the vertical extent of contamination. The laboratory results for soil sample analyses were uploaded to the GeoTracker AB2886 database. Copies of the GeoTracker upload confirmation receipts (EDF) are provided within Appendix D.

4.4 Monitoring Well Construction

Monitoring wells MW-10, MW-11, and MW-12 were constructed using flush-threaded, four-inch diameter, 0.020-inch factory-slotted Schedule 40 PVC pipe. The screen interval in each well extends from 7.0 feet bgs to 30 feet bgs. The filter pack surrounding the screen intervals consists of No.2/12 silica sand from the bottom of the well boring to one foot above the screen intervals. Each wellhead was secured with a locking well cap, and protected by a traffic-rated well vault set flush with the local ground surface. Additional details of well construction are provided in the field notes, lithologic boring logs and well construction logs provided in Appendix B. Well construction information was uploaded to the GeoTracker AB2886 database. Copies of GeoTracker upload confirmation receipts are provided within Appendix D.

EMCON 94 - CPT

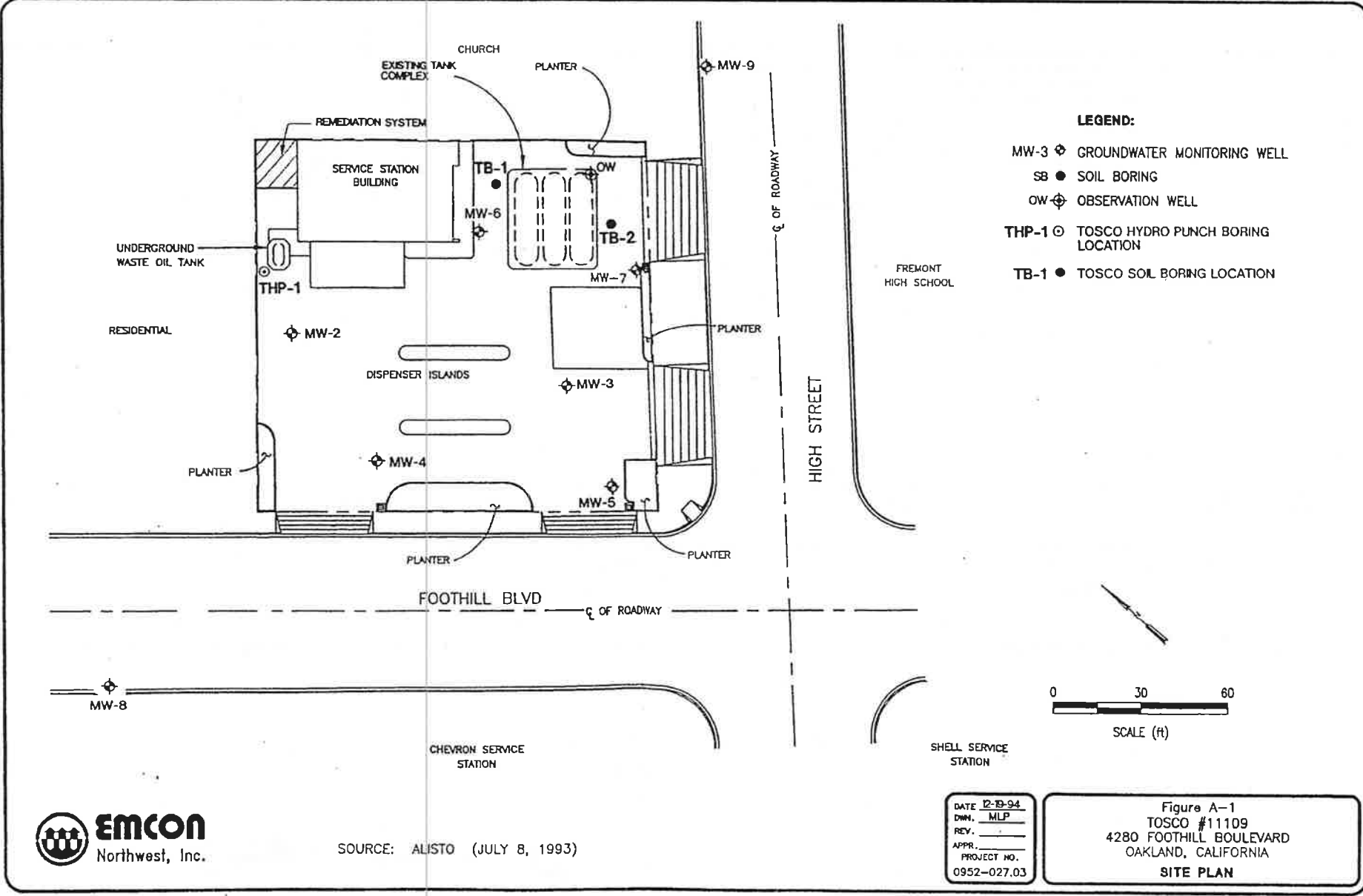
Table A-1

Site Number 11109
4280 Foothill Boulevard, Oakland, California

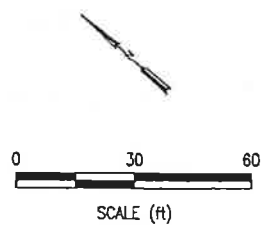
Soil Sample Results of Analyses (ppm)

Sample Number	Depth (feet)	Date Collected	California DHS LUFT Method TPH-G	California DHS LUFT Method Hydrocarbon Scan			BTEX EPA Method 5030/8020			
			TPH-G	TPH-D	TPH-O	Benzene	Toluene	Ethylbenzene	Total Xylenes	
THP1-S-9.5-10**	9.5-10	10/19/94	nd	nd	nd	nd	nd	nd	nd	
THP1-S-17-17.5	17-17.5	10/19/94	nd	nd	nd	nd	nd	nd	nd	
TB1-S-17-17.5***	17-17.5	10/19/94	nd	nd	nd	nd	nd	nd	nd	
TB1-S-24.5-25	24.5-25	10/19/94	nd	nd	33	nd	nd	nd	nd	
TB2-S-16-16.5	16-16.5	10/19/94	51	nd	8	0.09	nd*	0.4	0.8	
TB2-S-27-27.5	27-27.5	10/19/94	nd	nd	nd	nd	nd	nd	nd	

<p>NOTE:</p> <p>TPH-G = Total petroleum hydrocarbons as gasoline.</p> <p>TPH-D = Total petroleum hydrocarbons as diesel.</p> <p>TPH-O = Total petroleum hydrocarbons as oil.</p> <p>nd = Not detected at or above method reporting limit.</p> <p>n/a = Not applicable.</p> <p>— = Not analyzed.</p>	<p>TW = Tosco well.</p> <p>TB = Tosco boring.</p> <p>TD = Tosco dispenser soil sample.</p> <p>THP = Tosco HydroPunch.</p> <p>SGP = Soil gas probe.</p> <p>* = Raised method reporting limits (see laboratory report in Attachment D).</p> <p>** = THP1 is referred to as HP1 on the lab report.</p> <p>*** = TB1 and TB2 are referred to as SB1 and SB2 on the lab report.</p>
---	--



- LEGEND:**
- MW-3 ◊ GROUNDWATER MONITORING WELL
 - SB ● SOIL BORING
 - OW ⊕ OBSERVATION WELL
 - THP-1 ⊙ TOSCO HYDRO PUNCH BORING LOCATION
 - TB-1 ● TOSCO SOIL BORING LOCATION



SOURCE: ALISTO (JULY 8, 1993)

DATE 12-19-94
 DWN. MLP
 REV. _____
 APPR. _____
 PROJECT NO. 0952-027.03

Figure A-1
 TOSCO #11109
 4280 FOOTHILL BOULEVARD
 OAKLAND, CALIFORNIA
SITE PLAN



Appendix E

Groundwater Data and Figures

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)
MW-1	1/31/1990		38.19	15.41		22.78	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-1	9/16/2010		--	--		--	--	5,500	400	250	320	410	11	<20	<2.5	<2.5	<2.5	<500	<2.5	<2.5
MW-2	2/5/1990		41.22	21.90		19.32	--	1,300	14	<0.1	9	13	--	--	--	--	--	--	--	--
MW-2	2/14/1991		41.22	21.16		20.06	<10,000	<50	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
MW-2	5/13/1991		41.22	21.32		19.90	<50	<50	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
MW-2	7/24/1991		41.22	22.92		18.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	10/3/1991		41.22	24.90		16.32	<50	<50	<0.3	0.8	<0.3	<0.3	--	--	--	--	--	--	--	--
MW-2	10/15/1991		41.22	24.10		17.12	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	12/16/1991		41.22	23.95		17.27	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	1/6/1992		41.22	23.30		17.92	<50	<50	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
MW-2	1/22/1992		41.22	23.14		18.08	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	1/28/1992		41.22	22.99		18.23	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	2/5/1992		41.22	22.63		18.59	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	2/12/1992		41.22	22.04		19.18	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	2/17/1992		41.22	20.84		20.38	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	4/3/1992		41.22	18.29		22.93	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	4/8/1992		41.22	18.86		22.36	63	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	4/14/1992		41.22	19.45		21.77	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	4/29/1992		41.22	20.35		20.87	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	5/7/1992		41.22	20.84		20.38	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	7/3/1992		41.22	22.34		18.88	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	10/6/1992		41.22	23.73		17.49	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	12/31/1992		41.22	21.12		20.10	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	4/21/1993	a	41.22	17.68		23.54	<50	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	7/7/1993		41.22	20.30		20.92	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	9/21/1993		41.22	21.93		19.29	--	<50	0.9	0.7	0.7	2.6	21.54	--	--	--	--	--	--	--
MW-2	12/17/1993		41.22	21.48		19.74	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	12/23/1993		--	--		--	--	<50	<0.5	<0.5	<0.5	0.7	--	--	--	--	--	--	--	--
MW-2	4/7/1994		41.22	20.25		20.97	--	<50	<0.5	<0.5	<0.5	<0.5	12.2	--	--	--	--	--	--	--
MW-2	7/6/1994		41.22	20.59		20.63	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-2	10/7/1994		41.22	22.04		19.18	--	<50	<0.5	<0.5	<0.5	<0.5	15.2	--	--	--	--	--	--	--
MW-2	1/27/1995		41.22	26.12		15.10	440	<50	<0.5	<0.5	<0.5	<1.0	--	--	--	--	--	--	--	--
MW-2	3/30/1995		41.22	12.34		28.88	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--
MW-2	6/20/1995		41.22	16.42		24.80	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--
MW-2	10/3/1995		41.22	20.06		21.16	--	<50	<0.50	<0.50	<0.50	<1.0	<5.0	--	--	--	--	--	--	--
MW-2	12/6/1995		41.22	21.31		19.91	--	<50	<0.50	<0.50	<0.50	<1.0	46	--	--	--	--	--	--	--
MW-2	3/21/1996		41.22	12.28		28.94	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-2	6/21/1996		41.22	13.28		27.94	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-2	9/6/1996		41.22	13.94		27.28	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	9/9/1996		--	--		--	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-2	12/19/1996		41.22	12.19		29.03	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-2	3/17/1997		41.22	11.59		29.63	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	8/12/1997		41.22	13.21		28.01	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	12/10/1997		41.22	12.34		28.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/12/1998		41.22	11.04		30.18	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	6/23/1998		41.22	11.77		29.45	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/31/1999		41.22	12.38		28.84	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	8/25/1999		41.22	17.72		23.50	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/9/2000		41.22	11.94		29.28	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/8/2001		41.22	10.31		30.91	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/8/2002		41.22	14.35		26.87	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/18/2002		41.22	13.11		28.11	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/11/2003		41.22	13.24		27.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	12/9/2003	b	41.22	18.58		22.64	--	350	<0.50	<0.50	0.56	2.8	24	<20	<0.50	<0.50	<0.50	<100	<100	<0.50
MW-2	3/9/2004		41.22	12.52		28.70	--	74	<0.50	<0.50	0.83	4.7	27	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50
MW-2	9/17/2004		41.22	18.05		23.17	--	59	<0.50	<0.50	<0.50	<0.50	21	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50
MW-2	3/7/2005	c	41.22	2.32		38.90	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	9/5/2006	c	41.22	10.46		30.76	--	79	<0.50	5.1	<0.50	0.73	<0.50	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50
MW-2	3/5/2007	c	41.22	12.25		28.97	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	3/6/2008	d	41.22	12.33		28.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	9/5/2012		--	--		--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-2	9/5/2012		41.22	--		--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	2/5/1990		40.74	17.45		23.29	--	1,400	15	<2.5	11	8	--	--	--	--	--	--	--	--
MW-3	2/14/1991		40.74	18.52		22.22	--	320	8	<0.3	8	1	--	--	--	--	--	--	--	--
MW-3	5/13/1991		40.74	19.32		21.42	--	640	13	<0.3	18	1	--	--	--	--	--	--	--	--
MW-3	7/24/1991		40.74	20.69		20.05	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	10/3/1991		40.74	19.47		21.27	--	940	21	<0.3	23	2.1	--	--	--	--	--	--	--	--
MW-3	10/15/1991		40.74	20.46		20.28	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	12/4/1991		40.74	18.29		22.45	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)	
MW-3	12/16/1991		40.74	18.34			--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	1/6/1992		40.74	18.50		22.24	--	580	6.1	1	6.1	7.1	--	--	--	--	--	--	--	--	--
MW-3	1/22/1992		40.74	17.86		22.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	1/28/1992		40.74	15.84		24.90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	2/5/1992		40.74	17.53		23.21	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	2/12/1992		40.74	17.15		23.59	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	2/17/1992		40.74	16.18		24.56	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	4/3/1992		40.74	14.80		25.94	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	4/8/1992		40.74	17.06		23.68	--	1,100	30	4.6	32	11	--	--	--	--	--	--	--	--	--
MW-3	4/14/1992		40.74	15.22		25.52	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	4/29/1992		40.74	15.90		24.84	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	5/7/1992		40.74	16.35		24.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	7/3/1992		40.74	17.74		23.00	--	1,200	38	<2.5	24	<2.5	--	--	--	--	--	--	--	--	--
MW-3	10/8/1992		40.74	19.06		21.68	--	1,400	31	<0.5	25	13	--	--	--	--	--	--	--	--	--
MW-3	12/31/1992		40.74	16.61		24.13	--	820	12	4.1	13	5.9	--	--	--	--	--	--	--	--	--
MW-3	12/31/1992	e	40.74	16.61		24.13	--	960	11	3.6	10	3.8	--	--	--	--	--	--	--	--	--
MW-3	4/21/1993		40.74	14.24		26.50	--	420	5.6	<0.5	3.9	1.4	--	--	--	--	--	--	--	--	--
MW-3	4/21/1993	e	40.74	14.24		26.50	--	390	5	<0.5	3.7	1.5	--	--	--	--	--	--	--	--	--
MW-3	7/7/1993	f	40.13	15.19		24.94	--	54	0.6	0.6	<0.5	<0.5	12.68	--	--	--	--	--	--	--	--
MW-3	9/21/1993		40.13	16.58		23.55	--	540	7.9	0.9	4.7	2.4	--	--	--	--	--	--	--	--	--
MW-3	12/17/1993		40.13	15.82		24.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	12/23/1993		--	--		--	--	500	9.8	1.5	3.3	2.1	--	--	--	--	--	--	--	--	--
MW-3	12/23/1993	e	--	--		--	--	480	9.2	<0.5	5.4	5.3	--	--	--	--	--	--	--	--	--
MW-3	4/7/1994		40.13	28.50		11.63	--	460	20	7.4	8.9	11	18.2	--	--	--	--	--	--	--	--
MW-3	4/7/1994	e	40.13	28.50		11.63	--	460	20	7.7	9	11	--	--	--	--	--	--	--	--	--
MW-3	7/6/1994		--	--		--	--	300	10	0.6	1.7	6.4	5.54	--	--	--	--	--	--	--	--
MW-3	10/7/1994		40.13	27.65		12.48	--	620	28	<0.5	2.2	12	31.4	--	--	--	--	--	--	--	--
MW-3	1/27/1995		40.13	27.65		12.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/30/1995		40.13	26.05		14.08	--	300	10	6	3.4	18	--	--	--	--	--	--	--	--	--
MW-3	6/20/1995		40.13	19.49		20.64	--	170	7.2	3.4	0.85	15	--	--	--	--	--	--	--	--	--
MW-3	10/3/1995		40.13	24.93		15.20	--	170	2.1	<0.50	0.81	8	6.7	--	--	--	--	--	--	--	--
MW-3	12/6/1995		40.13	25.14		14.99	--	1,700	6.7	3.1	2.8	210	64	--	--	--	--	--	--	--	--
MW-3	12/6/1995	e	40.13	25.14		14.99	--	1,400	6.1	3	1.7	190	53	--	--	--	--	--	--	--	--
MW-3	3/21/1996		40.13	9.48		30.65	--	<50	0.5	<1.0	<1.0	1	<10	--	--	--	--	--	--	--	--
MW-3	6/21/1996		40.13	11.60		28.53	--	<50	13	<1.0	<1.0	<1.0	12	--	--	--	--	--	--	--	--
MW-3	9/6/1996		40.13	12.23		27.90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	9/9/1996		--	--		--	--	<250	6.5	<5.0	<5.0	<5.0	<50	--	--	--	--	--	--	--	--
MW-3	12/19/1996		40.13	10.46		29.67	--	<50	4.1	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-3	3/17/1997		40.13	9.86		30.27	--	50	<5.0	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-3	8/12/1997		40.13	12.11		28.02	--	<50	0.79	<1.0	<1.0	<1.0	10	--	--	--	--	--	--	--	--
MW-3	12/10/1997		40.13	10.90		29.23	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-3	3/12/1998		40.13	10.20		29.93	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-3	3/12/1998	e	40.13	10.20		29.93	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-3	6/23/1998		40.13	10.17		29.96	--	50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-3	3/31/1999		40.13	11.45		28.68	--	60	<1.0	<1.0	<1.0	<1.0	6.2	--	--	--	--	--	--	--	--
MW-3	8/25/1999		40.13	12.52		27.61	--	<50	<1.0	<1.0	<1.0	<1.0	7.7	--	--	--	--	--	--	--	--
MW-3	3/9/2000		40.13	12.39		27.74	--	<50	<0.5	0.54	<0.5	1.7	6.3	--	--	--	--	--	--	--	--
MW-3	3/8/2001		40.13	10.41		29.72	--	<50	<0.5	0.59	<0.5	7.7	--	--	--	--	--	--	--	--	--
MW-3	3/8/2002		40.13	9.83		30.30	--	62	<0.5	<0.5	<0.5	<1.0	11.6	--	--	--	--	--	--	--	--
MW-3	3/18/2002		40.13	9.20		30.93	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/11/2003		40.13	10.54		29.59	--	<50	<0.50	<0.50	<0.50	<0.50	6.7	--	--	--	--	--	--	--	--
MW-3	12/9/2003		40.13	12.88		27.25	--	<50	<0.50	<0.50	<0.50	<0.50	6.4	<20	<0.50	<0.50	<0.50	<100	--	--	--
MW-3	3/9/2004		40.13	9.49		30.64	--	<50	<0.50	<0.50	<0.50	0.63	6.9	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	<0.50
MW-3	9/17/2004		40.13	12.76		27.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/7/2005		40.13	7.30		32.83	--	<50	<0.50	<0.50	<0.50	0.52	5.1	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	<0.50
MW-3	9/6/2005		42.92	10.81		32.11	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/6/2006		42.92	8.85		34.07	--	<50	<0.50	<0.50	<0.50	<0.50	6.9	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-3	9/5/2006		42.92	9.86		33.06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/5/2007		42.92	8.33		34.59	--	<50	<0.50	<0.50	<0.50	<0.50	5.4	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-3	9/7/2007		42.92	11.10		31.82	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/6/2008		42.92	8.92		34.00	--	<50	<0.50	<0.50	<0.50	<0.50	4.2	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-3	9/3/2008		42.92	12.19		30.73	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/4/2009		42.92	8.28		34.64	--	<50	<0.50	<0.50	<0.50	<0.50	4.9	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-3	9/30/2009		42.92	11.60		31.32	--	<50	<0.50	<0.50	<0.50	<0.50	6.8	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-3	10/28/2009		42.92	10.40		32.52	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	3/23/2010		42.92	8.27		34.65	--	<50	<0.50	<0.50	<0.50	<1.0	3.2	<4.0	<0.50	<0.50	<0.50	<100	<0.50	<0.50	<0.50
MW-3	6/10/2010		42.92	9.40		33.52	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-3	9/16/2010		42.92	11.14		31.78	--	<50	<0.50	<0.50	<0.50	<1.0	5.9	<4.0	<0.50	<0.50	<0.50	<100	<0.50	<0.50	<0.50
MW-3	2/23/2011		42.92	8.71		34.21	--	--	--	--	--	--	0.58	--	--	--	--	--	--	--	--
MW-3	9/28/2011		42.92	11.14		31.78	--	--	--	--	--	--	3.2	--	--	--	--	--	--	--	--
MW-3	3/8/2012		42.92	11.01		31.91	--	--	--	--	--	--	<0.50(*)	--	--	--	--	--	--	--	--

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)
MW-3	9/5/2012		42.92	11.42		31.50	--	--	--	--	--	--	6.5	--	--	--	--	--	--	--
MW-3	3/20/2013		42.92	10.30	--	32.62	--	--	--	--	--	--	2.6	--	--	--	--	--	--	--
MW-4	2/5/1990		40.11	20.75		19.36	--	620	<0.5	9	<0.5	10	--	--	--	--	--	--	--	--
MW-4	2/14/1991		40.11	21.73		18.38	--	180	<0.3	0.4	<0.3	2	--	--	--	--	--	--	--	--
MW-4	5/13/1991		40.11	18.55		21.56	--	72	0.7	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
MW-4	7/24/1991		40.11	21.31		18.80	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	10/3/1991		40.11	22.57		17.54	--	57	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
MW-4	10/15/1991		40.11	22.88		17.23	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	12/4/1991		40.11	22.54		17.57	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	12/16/1991		40.11	22.59		17.52	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	1/6/1992		40.11	22.00		18.11	--	480	0.8	3.2	1.9	7.7	--	--	--	--	--	--	--	--
MW-4	1/22/1992		40.11	21.58		18.53	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	1/28/1992		40.11	21.42		18.69	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	2/5/1992		40.11	21.10		19.01	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	2/12/1992		40.11	20.74		19.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	2/17/1992		40.11	19.78		20.33	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	4/3/1992		40.11	16.80		23.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	4/8/1992		40.11	17.13		22.98	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-4	4/14/1992		40.11	17.74		22.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	4/29/1992		40.11	18.56		21.55	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	5/7/1992		40.11	19.10		21.01	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	7/3/1992		40.11	20.71		19.40	--	<50	0.6	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-4	10/8/1992		40.11	22.43		17.68	--	270	<0.5	2.1	2.5	3.2	--	--	--	--	--	--	--	--
MW-4	12/31/1992		40.11	19.58		20.53	--	150	<0.5	<0.5	<0.5	1.3	--	--	--	--	--	--	--	--
MW-4	4/21/1993		40.11	17.79		22.32	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-4	7/7/1993		40.11	18.44		21.67	--	160	1.2	5.4	3.8	19	5.51	--	--	--	--	--	--	--
MW-4	9/21/1993		40.11	20.14		19.97	--	71	<0.5	1.9	<0.5	2.1	--	--	--	--	--	--	--	--
MW-4	12/17/1993		40.11	19.80		20.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	12/23/1993		--	--		--	--	<50	3.1	1.6	0.8	3.8	5.7	--	--	--	--	--	--	--
MW-4	4/7/1994		40.11	19.12		20.99	--	<50	<0.5	<0.5	<0.5	<0.5	11.7	--	--	--	--	--	--	--
MW-4	7/6/1994		40.11	19.90		20.21	--	62	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
MW-4	10/7/1994		40.11	20.07		20.04	--	<50	<0.5	<0.5	<0.5	<0.5	7.38	--	--	--	--	--	--	--
MW-4	1/27/1995		40.11	13.72		26.39	--	<50	<0.5	<0.5	<0.5	<1.0	--	--	--	--	--	--	--	--
MW-4	3/30/1995		40.11	11.46		28.65	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--
MW-4	6/20/1995		40.11	14.78		25.33	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--
MW-4	10/3/1995		40.11	19.62		20.49	--	<50	<0.50	<0.50	<0.50	<1.0	5	--	--	--	--	--	--	--
MW-4	12/6/1995		40.11	19.91		20.20	--	<50	<0.50	<0.50	<0.50	<1.0	47	--	--	--	--	--	--	--
MW-4	3/21/1996		40.11	11.12		28.99	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-4	6/21/1996		40.11	12.21		27.90	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-4	9/6/1996		40.11	12.89		27.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	9/9/1996		--	--		--	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-4	12/19/1996		40.11	11.01		29.10	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--
MW-4	3/17/1997		40.11	10.42		29.69	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	8/12/1997		40.11	12.77		27.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	12/10/1997		40.11	11.22		28.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/12/1998		40.11	10.81		29.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	6/23/1998		40.11	10.61		29.50	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/31/1999		40.11	11.46		28.65	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	8/25/1999		40.11	16.16		23.95	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/9/2000		40.11	12.23		27.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/8/2001		40.11	11.04		29.07	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/8/2002		40.11	12.73		27.38	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/18/2002		40.11	11.62		28.49	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/11/2003		40.11	13.44		26.67	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	12/9/2003		40.11	15.03		25.08	--	<250	<2.5	<2.5	<2.5	<2.5	130	<100	<2.5	<2.5	2.7	<500	--	--
MW-4	3/9/2004		40.11	11.04		29.07	--	<50	<0.50	<0.50	<0.50	<0.50	35	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50
MW-4	9/17/2004		40.11	16.75		23.36	--	<250	<2.5	<2.5	<2.5	<2.5	140	<100	<2.5	<2.5	2.6	<500	<2.5	<2.5
MW-4	3/7/2005		40.11	11.02		29.09	--	67	<0.50	<0.50	<0.50	<0.50	42	<20	<0.50	<0.50	0.56	<100	<0.50	<0.50
MW-4	9/6/2005		42.88	14.64		28.24	--	81	<0.50	<0.50	<0.50	<1.5	180	<10	<0.50	<0.50	2.8	<150	<0.50	<0.50
MW-4	3/6/2006		42.88	12.42		30.46	--	<100	<1.0	<1.0	<1.0	<1.0	110	<40	<1.0	<1.0	1.4	<600	<1.0	<1.0
MW-4	9/5/2006		42.88	13.81		29.07	--	130	<1.0	<1.0	<1.0	<1.0	190	<40	<1.0	<1.0	1.7	<600	<1.0	<1.0
MW-4	3/5/2007		42.88	10.63		32.25	--	<50	<0.50	<0.50	<0.50	<0.50	13	<20	<0.50	<0.50	<300	<0.50	<0.50	
MW-4	9/7/2007		42.88	14.77		28.11	--	90	<0.50	<0.50	<0.50	<0.50	130	<20	<0.50	<0.50	1.7	<300	<0.50	<0.50
MW-4	3/6/2008		42.88	11.30		31.58	--	<50	<0.50	<0.50	<0.50	<0.50	170	14	<0.50	<0.50	2.1	<300	<0.50	<0.50
MW-4	9/3/2008		42.88	16.11		26.77	--	<50	<5.0	<5.0	<5.0	<5.0	150	<100	<5.0	<5.0	<5.0	<3,000	<5.0	<5.0
MW-4	3/4/2009		42.88	10.78		32.10	--	140	<5.0	<5.0	<5.0	<5.0	110	<100	<5.0	<5.0	<5.0	<3,000	<5.0	<5.0
MW-4	9/30/2009		42.88	16.48		26.40	--	240	<2.0	<2.0	<2.0	<2.0	140	<40	<2.0	<2.0	<2.0	<1,200	<2.0	<2.0
MW-4	10/28/2009		42.88	15.07		27.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-4	3/23/2010		42.88	10.82		32.06	--	<50	<0.50	<0.50	<0.50	<1.0	84	18	<0.50	<0.50	0.88	<100	<0.50	<0.50
MW-4	6/10/2010		42.88	12.67		30.21	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)
MW-4	9/16/2010		42.88	15.72		27.16	--	120	<0.50	<0.50	<0.50	<1.0	72	8.0	<0.50	<0.50	0.82	<100	<0.50	<0.50
MW-4	2/23/2011		42.88	11.43		31.45	--	<50	--	--	--	--	55	--	--	--	--	--	--	--
MW-4	9/28/2011		42.88	15.34		27.54	--	150	--	--	--	--	62	--	--	--	--	--	--	--
MW-4	3/8/2012		42.88	15.03		27.85	--	120	--	--	--	--	42	--	--	--	--	--	--	--
MW-4	9/5/2012		42.88	15.90		26.98	--	56	<0.50	<0.50	<0.50	<1.0	47	18	<0.50	<0.50	<0.50	<250	<0.50	<0.50
MW-4	3/20/2013		42.88	13.80	--	29.08	--	<50	--	--	--	--	17	--	--	--	--	--	--	--
MW-5	10/3/1991		39.55	18.08		21.47	--	79,000	13,000	7,400	1,400	6,200	--	--	--	--	--	--	--	--
MW-5	10/15/1991		39.55	18.55		21.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	12/4/1991	g	39.55	18.44		20.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	12/16/1991	g	39.55	18.66		20.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	1/6/1992	g	39.55	19.12		20.32	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	1/22/1992		39.55	14.59		24.96	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	1/28/1992		39.55	15.25		24.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	2/5/1992	b	39.55	15.58		23.97	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	2/12/1992	g	39.55	15.54		24.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	2/17/1992	b	39.55	13.98		25.57	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/3/1992	g	39.55	13.63		25.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/8/1992	g	39.55	13.17		26.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/14/1992	g	39.55	13.45		26.09	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/29/1992	g	39.55	13.75		25.73	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	5/7/1992	g	39.55	16.15		23.36	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	7/3/1992	g	39.55	17.67		21.80	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/1/1992	g	39.55	17.83		21.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	10/8/1992	g	39.55	17.86		20.77	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	12/31/1992	b	39.55	15.20		24.35	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/21/1993	g	39.55	12.64		26.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	7/7/1993	g,f	39.14	12.68		25.64	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/21/1993	b	39.14	14.35		24.79	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	12/17/1993	g	39.14	12.61		26.12	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/7/1994		39.14	30.00		9.14	--	66,000	3,000	1,700	250	6,800	2,002	--	--	--	--	--	--	--
MW-5	7/6/1994		--	--		--	--	29,000	1,900	330	63	2,700	1,141	--	--	--	--	--	--	--
MW-5	10/7/1994		39.14	28.70		10.44	--	250,000	2,600	660	830	5,200	37.7	--	--	--	--	--	--	--
MW-5	10/7/1994	e	39.14	28.70		10.44	--	45,000	2,900	540	260	2,600	--	--	--	--	--	--	--	--
MW-5	1/27/1995		39.14	28.70		10.44	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/30/1995		39.14	28.95		10.19	--	50,000	7,900	2,600	520	6,400	--	--	--	--	--	--	--	--
MW-5	3/30/1995	e	39.14	28.95		10.19	--	43,000	7,900	2,500	440	6,200	--	--	--	--	--	--	--	--
MW-5	6/20/1995		39.14	22.54		16.60	--	34,000	5,100	1,900	300	3,700	--	--	--	--	--	--	--	--
MW-5	6/20/1995	e	39.14	22.54		16.60	--	26,000	3,500	290	<25	3,300	--	--	--	--	--	--	--	--
MW-5	10/3/1995		39.14	18.84		20.30	--	12,000	68	42	11	1,600	330	--	--	--	--	--	--	--
MW-5	10/3/1995	e	39.14	18.84		20.30	--	12,000	46	39	10	1,600	320	--	--	--	--	--	--	--
MW-5	12/6/1995		39.14	19.07		20.07	--	16,000	1,200	93	51	700	600	--	--	--	--	--	--	--
MW-5	3/21/1996		39.14	7.43		31.71	--	1,500	89	28	6	250	<10	--	--	--	--	--	--	--
MW-5	3/21/1996	e	39.14	7.43		31.71	--	1,900	92	30	7	270	<10	--	--	--	--	--	--	--
MW-5	6/21/1996		39.14	9.87		29.27	--	3,500	740	150	19	400	<100	--	--	--	--	--	--	--
MW-5	6/21/1996	e	39.14	9.87		29.27	--	2,700	680	140	20	400	<50	--	--	--	--	--	--	--
MW-5	9/6/1996		39.14	10.52		28.62	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/9/1996		--	--		--	--	82,000	3,100	1,700	850	9,100	<2,500	--	--	--	--	--	--	--
MW-5	9/9/1996	e	--	--		--	--	90,000	2,900	1,600	670	6,900	<2,500	--	--	--	--	--	--	--
MW-5	12/19/1996		39.14	8.62		30.52	--	41,000	790	820	120	2,040	<500	--	--	--	--	--	--	--
MW-5	12/19/1996	e	39.14	8.62		30.52	--	26,000	490	430	63	1,140	<500	--	--	--	--	--	--	--
MW-5	3/17/1997		39.14	8.22		30.92	--	5,500	1.9	2.4	<1.0	29	--	--	--	--	--	--	--	--
MW-5	3/17/1997	e	39.14	8.22		30.92	--	6,600	2.5	2.7	<1.0	<1.0	28	--	--	--	--	--	--	--
MW-5	8/12/1997	g	39.14	12.18		26.74	--	33,000	6,400	2,400	680	4,400	<1,000	--	--	--	--	--	--	--
MW-5	8/12/1997	e	39.14	12.18		26.74	--	36,000	6,100	2,500	720	4,500	<500	--	--	--	--	--	--	--
MW-5	12/10/1997	g	39.14	10.78		28.30	--	31,000	3,000	2,500	560	5,100	500	--	--	--	--	--	--	--
MW-5	12/10/1997	e	39.14	10.78		28.30	--	37,000	2,900	2,500	440	4,800	--	--	--	--	--	--	--	--
MW-5	3/12/1998	g	39.14	10.11		28.81	--	100,000	1,600	870	250	2,600	<250	--	--	--	--	--	--	--
MW-5	6/23/1998		39.14	10.20		28.92	--	27,000	2,500	840	370	2,900	<250	--	--	--	--	--	--	--
MW-5	6/23/1998	e	39.14	10.20		28.92	--	27,000	2,600	840	400	2,950	<500	--	--	--	--	--	--	--
MW-5	8/25/1999	g	39.14	14.69		24.07	--	180,000	2,700	400	830	2,800	26	--	--	--	--	--	--	--
MW-5	3/9/2000	g	39.14	14.83		23.71	--	53,000	12,000	2,600	1,900	9,100	<5.0	--	--	--	--	--	--	--
MW-5	3/8/2002	g	39.14	11.45		26.19	--	33,000	8,240	1,080	1,010	2,900	34.3	--	--	--	--	--	--	--
MW-5	3/18/2002		39.14	8.03		31.11	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/11/2003	g	39.14	9.60		29.09	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	12/9/2003	g	39.14	11.44		27.72	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/9/2004		39.14	7.91		31.23	--	31,000	3,900	1,100	780	3,600	<50	<2,000	<50	<50	<50	<10,000	96	<50
MW-5	9/17/2004	g	39.14	12.13		27.13	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/7/2005	g	39.14	8.62		30.52	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/6/2005	g	39.14	11.16		27.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/6/2006	g,b	39.14	8.60		30.54	--	32,000	7,500	810	1,200	2,300	<50	<2,000	60	<50	<50	<30,000	<50	<50

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)	
MW-5	9/5/2006	g	39.14	6.16		32.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/5/2007	b	39.14	8.34		30.80	--	90,000	10,000	4,200	1,900	7,900	<50	<2,000	57	<50	<50	<30,000	<50	<50	
MW-5	9/7/2007	g	39.14	15.15		23.99	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	1/14/2008	g	39.14	10.30		28.84	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	2/27/2008	g	39.14	13.22		25.92	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/6/2008	g	39.14	12.90		26.24	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/3/2008	g	39.14	12.90		26.24	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/4/2009	g	39.14	8.45		30.69	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	4/8/2009	g	39.14	9.05		30.09	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	5/11/2009	g	39.14	9.10		30.04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	6/16/2009	g	39.14	9.15		29.99	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	7/22/2009	g	39.14	9.33		29.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	8/6/2009	g	39.14	10.05		29.09	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/30/2009	g	39.14	10.55		28.59	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	10/28/2009		39.14	10.48		28.66	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/23/2010		39.14	7.10		32.04	--	67,000	1,400	380	620	1,800	<5.0	<40	<5.0	<5.0	<5.0	<1,000	<5.0	<5.0	
MW-5	6/10/2010	g	39.14	8.26		30.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/16/2010	g	39.14	9.14		30.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	2/23/2011	g	39.14	8.33		30.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/28/2011	g	39.14	10.46		28.68	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/8/2012	g	39.14	10.27		28.87	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	9/5/2012	g	39.14	11.80		27.69	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-5	3/20/2013	g	39.14	9.73	9.71	29.43	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	10/3/1991		41.59	20.73		20.86	--	<50	0.7	0.8	<0.3	1.3	--	--	--	--	--	--	--	--	--
MW-6	10/15/1991		41.59	21.20		20.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	12/4/1991		41.59	21.26		20.33	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	12/16/1991		41.59	21.12		20.47	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	1/6/1992		41.59	20.29		21.30	--	<50	<0.5	<0.5	<0.5	1.6	--	--	--	--	--	--	--	--	--
MW-6	1/22/1992		41.59	20.12		21.47	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	1/28/1992		41.59	20.20		21.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	2/5/1992		41.59	20.09		21.50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	2/12/1992		41.59	19.15		22.44	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	2/17/1992		41.59	18.02		23.57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	4/3/1992		41.59	16.62		24.97	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	4/8/1992		41.59	17.06		24.53	--	<50	0.6	<0.5	0.8	<0.5	--	--	--	--	--	--	--	--	--
MW-6	4/14/1992		41.59	17.23		24.36	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	4/29/1992		41.59	18.12		23.47	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	5/7/1992		41.59	18.52		23.07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	7/3/1992		41.59	19.71		21.88	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	10/8/1992		41.59	21.22		20.37	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	10/8/1992	e	41.59	21.22		20.37	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	12/31/1992		41.59	21.33		20.26	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	4/21/1993		41.59	16.45		25.14	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	7/7/1993		41.59	18.68		22.91	--	<50	<0.5	<0.5	<0.5	<0.5	28.96	--	--	--	--	--	--	--	--
MW-6	9/21/1993		41.59	19.64		21.95	--	<50	<0.5	<0.5	<0.5	1.6	--	--	--	--	--	--	--	--	--
MW-6	12/17/1993		41.59	21.08		20.51	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	12/23/1993		--	--		--	--	<50	<0.5	0.5	<0.5	0.6	13.95	--	--	--	--	--	--	--	--
MW-6	4/7/1994		41.59	21.27		20.32	--	<50	<0.5	<0.5	<0.5	<0.5	35.1	--	--	--	--	--	--	--	--
MW-6	7/6/1994		41.59	19.81		21.78	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	7/6/1994	e	41.59	19.81		21.78	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-6	10/7/1994		41.59	21.25		20.34	--	<50	<0.5	<0.5	<0.5	<0.5	24.3	--	--	--	--	--	--	--	--
MW-6	1/27/1995		41.59	12.39		29.20	--	<50	<0.5	<0.5	<0.5	<1.0	--	--	--	--	--	--	--	--	--
MW-6	3/30/1995		41.59	11.34		30.25	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--	--
MW-6	6/20/1995		41.59	15.12		26.47	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--	--
MW-6	10/3/1995		41.59	20.68		20.91	--	<50	<0.50	<0.50	<0.50	<1.0	66	--	--	--	--	--	--	--	--
MW-6	12/6/1995		41.59	23.77		17.82	--	<50	<0.50	<0.50	<0.50	<1.0	45	--	--	--	--	--	--	--	--
MW-6	3/21/1996		41.59	11.55		30.04	--	<50	<0.5	<1.0	<1.0	<1.0	41	--	--	--	--	--	--	--	--
MW-6	6/21/1996		41.59	12.60		28.99	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-6	9/6/1996		41.59	13.25		28.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	9/9/1996		--	--		--	--	<50	<0.5	<1.0	<1.0	<1.0	22	--	--	--	--	--	--	--	--
MW-6	12/19/1996		41.59	11.45		30.14	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
MW-6	3/17/1997		41.59	10.80		30.79	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	8/12/1997		41.59	13.11		28.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	12/10/1997		41.59	13.84		27.75	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/12/1998		41.59	11.17		30.42	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	6/23/1998		41.59	13.27		28.32	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/31/1999		41.59	12.91		28.68	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	8/25/1999		41.59	15.93		25.66	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/9/2000		41.59	11.49		30.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/8/2001		41.59	10.81		30.78	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)	
MW-6	3/8/2002		41.59	14.28		27.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/18/2002		41.59	13.10		28.49	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/11/2003		41.59	13.63		27.96	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	12/9/2003		41.59	14.26		27.33	--	<50	<0.50	<0.50	<0.50	<0.50	12	<20	<0.50	<0.50	<0.50	<100	--	--	
MW-6	3/9/2004		41.59	11.87		29.72	--	<50	<0.50	<0.50	<0.50	<0.50	10	<20	<0.50	<0.50	<0.50	<100	0.58	<0.50	
MW-6	9/17/2004		41.59	16.45		25.14	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/7/2005		41.59	13.65		27.94	--	<50	<0.50	<0.50	<0.50	<0.50	5.8	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-6	9/6/2005		44.37	14.23		30.14	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/6/2006		44.37	12.89		31.48	--	<50	<0.50	<0.50	<0.50	<0.50	8.1	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-6	9/5/2006		44.37	14.10		30.27	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/5/2007		44.37	11.43		32.94	--	<50	<0.50	<0.50	<0.50	<0.50	5.6	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-6	9/7/2007		44.37	16.00		28.37	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/6/2008		44.37	11.84		32.53	--	<50	<0.50	<0.50	<0.50	<0.50	1.9	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-6	9/3/2008		44.37	16.24		28.13	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/4/2009		44.37	11.68		32.69	--	<50	<0.50	<0.50	<0.50	<0.50	2.8	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-6	9/30/2009		44.37	16.83		27.54	--	<50	<0.50	<0.50	<0.50	<0.50	4.4	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-6	10/28/2009		44.37	15.63		28.74	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	3/23/2010		44.37	11.48		32.89	--	<50	<0.50	<0.50	<0.50	<1.0	1.0	<4.0	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-6	6/10/2010		44.37	12.54		31.83	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-6	9/16/2010		44.37	15.95		28.42	--	<50	<0.50	<0.50	<0.50	<1.0	0.80	<4.0	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-6	2/23/2011		44.37	12.34		32.03	--	--	--	--	--	--	<0.50	--	--	--	--	--	--	--	--
MW-6	9/28/2011		44.37	15.81		28.56	--	--	--	--	--	--	3.4	--	--	--	--	--	--	--	--
MW-6	3/8/2012		44.37	15.51		28.86	--	--	--	--	--	--	0.58	--	--	--	--	--	--	--	--
MW-6	9/5/2012		44.37	15.88		28.49	--	--	--	--	--	--	2.1	--	--	--	--	--	--	--	--
MW-6	3/20/2013		44.37	14.36	--	30.01	--	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<4.0	<0.50	<0.50	<0.50	<0.50	<250	<0.50	<0.50
MW-7	10/3/1991		40.64	14.93		25.71	--	360	62	13	3.4	20	--	--	--	--	--	--	--	--	--
MW-7	10/15/1991		40.64	15.16		25.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	12/4/1991		40.64	15.41		25.23	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	12/16/1991		40.64	15.21		25.43	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	1/6/1992		40.64	14.56		26.08	--	1,100	170	<0.5	24	23	--	--	--	--	--	--	--	--	--
MW-7	1/22/1992		40.64	14.63		26.01	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	1/28/1992		40.64	14.73		25.91	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	2/5/1992		40.64	14.58		26.06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	2/12/1992		40.64	13.94		26.70	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	2/17/1992		40.64	13.10		27.54	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	4/3/1992		40.64	12.66		27.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	4/8/1992		40.64	12.77		27.87	--	750	150	<0.5	23	9.9	--	--	--	--	--	--	--	--	--
MW-7	4/14/1992		40.64	13.02		27.62	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	4/29/1992		40.64	13.59		27.05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	5/7/1992		40.64	13.95		26.69	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	7/3/1992		40.64	14.73		25.91	--	660	210	<2.5	33	8	--	--	--	--	--	--	--	--	--
MW-7	10/8/1992		40.64	15.75		24.89	--	320	49	1.4	13	6.2	--	--	--	--	--	--	--	--	--
MW-7	12/31/1992		40.64	13.57		27.07	--	900	100	<2.5	28	4.3	--	--	--	--	--	--	--	--	--
MW-7	4/21/1993		40.64	14.56		26.08	--	510	83	1.2	10	5.8	--	--	--	--	--	--	--	--	--
MW-7	7/7/1993	f	40.32	13.40		26.92	--	1,100	160	2	27	4	10.84	--	--	--	--	--	--	--	--
MW-7	7/7/1993	e	40.32	13.40		26.92	--	1,100	170	1.9	29	2.84	9.84	--	--	--	--	--	--	--	--
MW-7	9/21/1993		40.32	14.40		25.92	--	690	150	3.1	26	5.7	--	--	--	--	--	--	--	--	--
MW-7	9/21/1993	e	40.32	14.40		25.92	--	640	140	1.7	23	2.4	--	--	--	--	--	--	--	--	--
MW-7	12/17/1993		40.32	13.65		26.67	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	12/23/1993		--	--		--	--	250	64	1.2	9	1.8	7.81	--	--	--	--	--	--	--	--
MW-7	4/7/1994		40.32	30.62		9.70	--	140	32	1.4	<0.5	<0.5	6.32	--	--	--	--	--	--	--	--
MW-7	7/6/1994		40.32	16.88		23.44	--	410	94	1.3	10	3.5	<5.0	--	--	--	--	--	--	--	--
MW-7	10/7/1994		40.32	25.59		14.73	--	<50	9.2	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	--
MW-7	1/27/1995		40.32	9.82		30.50	--	810	570	3	60	17	--	--	--	--	--	--	--	--	--
MW-7	1/27/1995	e	40.32	9.82		30.50	--	930	620	4	77	21	--	--	--	--	--	--	--	--	--
MW-7	3/30/1995		40.32	9.15		31.17	--	180	65	0.53	2	<1.0	--	--	--	--	--	--	--	--	--
MW-7	6/20/1995		40.32	11.38		28.94	--	2,800	980	<5.0	<5.0	43	--	--	--	--	--	--	--	--	--
MW-7	10/3/1995		40.32	29.95		10.37	--	<50	<0.50	<0.50	<0.50	<1.0	<5.0	--	--	--	--	--	--	--	--
MW-7	12/6/1995		40.32	29.85		10.47	--	<50	<0.50	<0.50	<0.50	<1.0	<5.0	--	--	--	--	--	--	--	--
MW-7	3/21/1996		40.32	9.76		30.56	--	1,000	390	2	40	13	<1.0	--	--	--	--	--	--	--	--
MW-7	6/21/1996		40.32	11.01		29.31	--	<250	40	<5.0	<5.0	<5.0	<50	--	--	--	--	--	--	--	--
MW-7	9/6/1996		40.32	11.68		28.64	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	9/9/1996		--	--		--	--	<250	13	<5.0	<5.0	<5.0	<50	--	--	--	--	--	--	--	--
MW-7	12/19/1996		40.32	10.78		29.54	--	70	1.2	<1.0	1	<1.0	<10	--	--	--	--	--	--	--	--
MW-7	3/17/1997		40.32	9.96		30.36	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	8/12/1997		40.32	11.44		28.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	12/10/1997		40.32	10.42		29.90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	3/12/1998		40.32	9.51		30.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	6/23/1998		40.32	9.98		30.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	3/31/1999		40.32	10.38		29.94	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)	
MW-7	8/25/1999		40.32	12.38		27.94	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	3/9/2000		40.32	8.48		31.84	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	3/8/2001		40.32	8.37		31.95	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	3/18/2002		40.32	9.94		30.38	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	3/11/2003		40.32	11.26		29.06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-7	12/9/2003		40.32	12.76		27.56	--	270	26	<0.50	<0.50	<0.50	8.7	<20	<0.50	<0.50	<0.50	<100	--	--	
MW-7	3/9/2004		40.32	10.91		29.41	--	320	49	0.73	1.8	0.59	6.9	<20	<0.50	<0.50	<0.50	<100	1.2	<0.50	
MW-7	9/17/2004		40.32	13.20		27.12	--	330	17	<0.50	<0.50	<0.50	7.0	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-7	3/7/2005		40.32	8.18		32.14	--	340	41	0.79	0.79	0.73	7.2	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-7	9/6/2005		43.10	11.80		31.30	--	1,100	130	1.2	1.8	<1.5	16	30	0.60	<0.50	<0.50	<150	<0.50	<0.50	
MW-7	3/6/2006		43.10	8.39		34.71	--	440	31	0.78	0.74	0.81	8.3	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-7	9/5/2006		43.10	11.45		31.65	--	2,000	260	3.1	5.9	<2.5	12	<100	<2.5	<2.5	<2.5	<1,500	<2.5	<2.5	
MW-7	3/5/2007		43.10	9.31		33.79	--	2,200	110	2.2	4.0	1.8	7.6	<40	<1.0	<1.0	<1.0	<600	<1.0	<1.0	
MW-7	9/7/2007		43.10	12.18		30.92	--	220	8.4	<0.50	<0.50	<0.50	1.2	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-7	3/6/2008		43.10	10.05		33.05	--	1,800	54	1.2	1.1	<1.0	<1.0	<20	<1.0	<1.0	<1.0	<600	<1.0	<1.0	
MW-7	9/3/2008		43.10	13.17		29.93	--	540	13	0.69	<0.50	<0.50	5.5	17	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-7	3/4/2009		43.10	8.25		34.85	--	720	15	0.59	0.53	<0.50	3.4	12	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-7	9/30/2009		43.10	12.70		30.40	--	1,200	44	1.0	0.74	0.79	3.3	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-7	10/28/2009		43.10	11.17		31.93	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-7	3/23/2010		43.10	9.28		33.82	--	610	11	<0.50	<0.50	<1.0	<0.50	12	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-7	6/10/2010		43.10	10.24		32.86	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-7	9/16/2010		43.10	12.16		30.94	--	4,700	130	<5.0	7.4	<10	<5.0	<40	<5.0	<5.0	<5.0	<1,000	<5.0	<5.0	
MW-7	2/23/2011		43.10	9.62		33.48	--	2,200	26	1.1	1.4	1.6	4.0	<4.0	<0.50	<0.50	<0.50	<250	<0.50	<0.50	
MW-7	9/28/2011		43.10	11.80		31.30	--	3,800	380	4.8	28	4.3	9.5	13	<0.50	<0.50	<0.50	<250	<0.50	<0.50	
MW-7	3/8/2012		43.10	11.69		31.41	--	550	1.4	<0.50	<0.50	<1.0	2.3	<4.0	<0.50	<0.50	<0.50	<250	<0.50	<0.50	
MW-7	9/5/2012		43.10	11.80		31.50	--	830	16	1.3	0.66	1.4	3.0	<4.0	<0.50	<0.50	<0.50	<250	<0.50	<0.50	
MW-7	3/20/2013		43.10	10.88	--	32.22	--	--	--	--	3.4	--	--	--	--	--	--	--	--	--	
MW-8	10/3/1991		38.18	22.37		15.81	--	<50	<0.3	0.6	<0.3	0.9	--	--	--	--	--	--	--	--	
MW-8	10/15/1991		38.18	22.70		15.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	12/4/1991		38.18	22.44		15.74	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	12/16/1991		38.18	22.47		15.71	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	1/6/1992		38.18	21.94		16.24	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	
MW-8	1/22/1992		38.18	21.44		16.74	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	1/28/1992		38.18	21.20		16.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	2/5/1992		38.18	20.88		17.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	2/12/1992		38.18	20.54		17.64	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	2/17/1992		38.18	19.99		18.19	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	4/3/1992		38.18	16.75		21.43	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	4/8/1992		38.18	16.57		21.61	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	
MW-8	4/29/1992		38.18	18.61		19.57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	5/7/1992		38.18	18.41		19.77	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	7/3/1992		38.18	20.35		17.83	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	
MW-8	10/8/1992		38.18	21.74		16.44	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	12/31/1992		38.18	19.09		19.09	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	
MW-8	4/21/1993		38.18	18.92		19.26	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	
MW-8	7/7/1993		38.18	17.76		20.42	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	
MW-8	9/21/1993		38.18	19.71		18.47	--	<50	2.9	2.2	2.2	7.1	--	--	--	--	--	--	--	--	
MW-8	12/17/1993		38.18	21.33		16.85	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	12/23/1993		--	--		--	--	<50	<0.5	<0.5	<0.5	0.6	<5.0	--	--	--	--	--	--	--	
MW-8	4/7/1994		38.18	21.51		16.67	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	
MW-8	7/6/1994		38.18	17.41		20.77	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	
MW-8	10/7/1994		38.18	19.20		18.98	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	
MW-8	1/27/1995		38.18	12.25		25.93	--	<50	<0.5	<0.5	<0.5	<1.0	--	--	--	--	--	--	--	--	
MW-8	3/30/1995		38.18	10.35		27.83	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--	
MW-8	6/20/1995		38.18	13.37		24.81	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--	
MW-8	12/6/1995		38.18	18.42		19.76	--	<50	<0.50	<0.50	<0.50	<1.0	47	--	--	--	--	--	--	--	
MW-8	6/21/1996		38.18	13.03		25.15	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	
MW-8	9/6/1996		38.18	13.70		24.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	9/9/1996		--	--		--	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	
MW-8	12/19/1996		38.18	11.93		26.25	--	<50	<0.5	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	
MW-8	3/17/1997		38.18	11.29		26.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	8/12/1997		38.18	13.73		24.45	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	12/10/1997		38.18	11.88		26.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	3/12/1998		38.18	11.89		26.29	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	6/23/1998		38.18	11.33		26.85	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	3/31/1999		38.18	12.68		25.50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	8/25/1999		38.18	14.93		23.25	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	3/9/2000		38.18	9.14		29.04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	3/8/2001		38.18	8.41		29.77	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
MW-8	3/8/2002		38.18	11.18		27.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)	
MW-8	3/18/2002		38.18	10.72	--	27.46	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/11/2003		38.18	10.46	--	27.72	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/9/2004		38.18	9.79	--	28.39	--	<50	<0.50	<0.50	<0.50	<0.50	0.50	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-8	9/17/2004		38.18	15.35	--	22.83	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/7/2005		38.18	7.94	--	30.24	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-8	9/6/2005		40.95	13.06	--	27.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/6/2006		40.95	9.26	--	31.69	--	<50	<0.50	<0.50	<0.50	<0.50	0.59	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-8	9/5/2006		40.95	12.61	--	28.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/5/2007		40.95	9.12	--	31.83	--	<50	<0.50	<0.50	<0.50	0.53	<0.50	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-8	9/7/2007		40.95	13.56	--	27.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/6/2008		40.95	9.80	--	31.15	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-8	9/3/2008		40.95	14.20	--	26.75	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/4/2009		40.95	9.51	--	31.44	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	
MW-8	9/30/2009		40.95	14.92	--	26.03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	10/28/2009		40.95	13.56	--	27.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	6/10/2010		40.95	11.06	--	29.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	9/16/2010		40.95	14.41	--	26.54	--	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<4.0	<0.50	<0.50	<0.50	<100	<0.50	<0.50	
MW-8	9/28/2011		40.95	13.87	--	27.08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/8/2012		40.95	13.27	--	27.68	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	9/5/2012		40.95	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-8	3/20/2013		40.95	11.90	--	29.05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	10/3/1991		41.25	14.12	--	27.13	--	<50	<0.3	0.4	<0.3	<0.3	--	--	--	--	--	--	--	--	--
MW-9	10/15/1991		41.25	14.27	--	26.98	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	12/4/1991		41.25	13.84	--	27.41	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	12/16/1991		41.25	14.18	--	27.07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	1/6/1992		41.25	13.42	--	27.83	--	<50	<0.5	<0.5	<0.5	0.9	--	--	--	--	--	--	--	--	--
MW-9	1/22/1992		41.25	13.75	--	27.50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	1/28/1992		41.25	14.76	--	26.49	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	2/5/1992		41.25	13.38	--	27.87	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	2/12/1992		41.25	11.86	--	29.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	2/17/1992		41.25	10.78	--	30.47	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	4/3/1992		41.25	11.63	--	29.62	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	4/8/1992		41.25	12.25	--	29.00	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-9	4/14/1992		41.25	12.32	--	28.93	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	4/29/1992		41.25	13.07	--	28.18	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	5/7/1992		41.25	14.43	--	26.82	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	7/3/1992		41.25	13.85	--	27.40	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-9	10/8/1992		41.25	14.89	--	26.36	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-9	12/31/1992		41.25	11.90	--	29.35	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-9	4/21/1993		41.25	13.68	--	27.57	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-9	7/7/1993		41.25	13.12	--	28.13	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	--
MW-9	9/21/1993		41.25	14.00	--	27.25	--	<50	<0.5	<0.5	<0.5	<0.5	0.9	--	--	--	--	--	--	--	--
MW-9	12/17/1993		41.25	12.98	--	28.27	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	12/23/1993		--	--	--	--	--	<50	<0.5	<0.5	<0.5	<0.5	0.9	<5.0	--	--	--	--	--	--	--
MW-9	4/7/1994		41.25	13.24	--	28.01	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	--
MW-9	7/6/1994		41.25	13.77	--	27.48	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
MW-9	10/7/1994		41.25	14.60	--	26.65	--	<50	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	--
MW-9	1/27/1995		41.25	8.47	--	32.78	--	<50	<0.5	<0.5	<0.5	<1.0	--	--	--	--	--	--	--	--	--
MW-9	3/30/1995		41.25	8.19	--	33.06	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--	--
MW-9	6/20/1995		41.25	11.25	--	30.00	--	<50	<0.50	<0.50	<0.50	<1.0	--	--	--	--	--	--	--	--	--
MW-9	10/3/1995		41.25	14.68	--	26.57	--	<50	<0.50	<0.50	<0.50	<1.0	<5.0	--	--	--	--	--	--	--	--
MW-9	12/6/1995		41.25	16.07	--	25.18	--	<50	<0.50	<0.50	<0.50	<1.0	46	--	--	--	--	--	--	--	--
MW-9	3/21/1996		41.25	9.60	--	31.65	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--	--
MW-9	6/21/1996		41.25	10.86	--	30.39	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--	--
MW-9	9/6/1996		41.25	11.52	--	29.73	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	9/9/1996		--	--	--	--	--	<50	<0.5	<1.0	<1.0	<1.0	21	--	--	--	--	--	--	--	--
MW-9	12/19/1996		41.25	10.43	--	30.82	--	<50	<0.5	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--	--	--	--
MW-9	3/17/1997		41.25	9.87	--	31.38	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	8/12/1997		41.25	11.44	--	29.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	12/10/1997		41.25	10.44	--	30.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/12/1998		41.25	9.50	--	31.75	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	6/23/1998		41.25	10.06	--	31.19	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/31/1999		41.25	9.06	--	32.19	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	8/25/1999		41.25	12.00	--	29.25	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/9/2000		41.25	10.57	--	30.68	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/8/2001		41.25	9.73	--	31.52	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/8/2002		41.25	11.89	--	29.36	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/18/2002		41.25	9.68	--	31.57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/11/2003		41.25	9.21	--	32.04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/9/2004		41.25	10.99	--	30.26	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)	
MW-9	9/17/2004		41.25	13.35		27.90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/7/2005		41.25	8.94		32.31	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<20	<0.50	<0.50	<0.50	<100	<0.50	<0.50	<0.50
MW-9	9/6/2005		44.06	11.99		32.07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/6/2006		44.06	8.26		35.80	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-9	9/5/2006		44.06	11.63		32.43	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/5/2007		44.06	9.33		34.73	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<20	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-9	9/7/2007		44.06	12.28		31.78	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/6/2008		44.06	10.11		33.95	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-9	9/3/2008		44.06	13.49		30.57	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/4/2009		44.06	8.15		35.91	--	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<10	<0.50	<0.50	<0.50	<300	<0.50	<0.50	<0.50
MW-9	9/30/2009		44.06	12.98		31.08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	10/28/2009		44.06	11.98		32.08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/23/2010		44.06	10.59		33.47	--	<50	<0.50	<0.50	<0.50	<1.0	<0.50	<4.0	<0.50	<0.50	<0.50	<100	<0.50	<0.50	<0.50
MW-9	6/10/2010		44.06	10.25		33.81	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	2/23/2011		44.06	9.71		34.35	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	9/28/2011		44.06	11.66		32.40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/8/2012		44.06	11.56		32.50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	9/5/2012		44.06	11.18		32.88	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-9	3/20/2013		44.06	10.00	--	34.06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	6/16/2009	g	39.78	8.60		31.19	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	7/22/2009	g	39.78	9.68		30.11	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	6/6/2009		39.78	9.48		30.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	9/30/2009	g	39.78	9.69		30.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	10/28/2009		39.78	8.53		31.25	--	62,000	8,300	5,300	3,100	12,000	<50	<400	<50	<50	<50	<10,000	<50	<50	<50
MW-10	3/23/2010	b	39.78	7.70		32.08	--	59,000	6,500	4,800	2,300	9,700	<100	<800	<100	<100	<100	<20,000	<100	<100	<100
MW-10	6/10/2010	g	39.78	8.93		30.86	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	9/16/2010	g	39.78	9.69		30.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	2/23/2011		39.78	7.99		31.79	--	61,000	7,000	5,300	2,800	12,000	<100	<800	<100	<100	<100	<50,000	<100	<100	<100
MW-10	9/28/2011	g	39.78	10.36		29.64	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	3/8/2012	g	39.78	10.51		29.51	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	9/5/2012	g	39.78	10.25		29.54	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-10	3/20/2013	g	39.78	9.48	9.47	30.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-11	9/30/2009		40.04	10.55		29.49	--	30,000	850	1,400	1,000	3,700	27	<200	<10	<10	<10	<6,000	<10	<10	<10
MW-11	10/28/2009		40.04	8.00		32.04	--	27,000	1,100	2,300	1,500	5,800	<50	<400	<50	<50	<50	<10,000	<50	<50	<50
MW-11	3/23/2010		40.04	7.25		32.79	--	21,000	530	830	790	2,200	<25	<200	<25	<25	<25	<5,000	<25	<25	<25
MW-11	6/10/2010	b	40.04	9.65		30.39	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-11	9/16/2010		40.04	9.42		30.62	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-11	2/23/2011		40.04	7.60		32.44	--	10,000	380	260	330	540	7.2	<40	<5.0	<5.0	<5.0	<2,500	<5.0	<5.0	<5.0
MW-11	9/28/2011		40.04	9.88		30.16	--	5,900	230	92	260	370	6.4	26	<2.5	<2.5	<2.5	<1,300	<2.5	<2.5	<2.5
MW-11	3/8/2012		40.04	9.71		30.33	--	5,000	280	170	250	380	<5.0	<40	<5.0	<5.0	<5.0	<2,500	<5.0	<5.0	<5.0
MW-11	9/5/2012		40.04	10.60		29.44	--	22,000	1,000	1,600	1,200	4,500	6.2	<40	<5.0	<5.0	<5.0	<2,500	<5.0	<5.0	<5.0
MW-11	3/20/2013	i	40.04	9.54	--	30.50	--	16,000	250	620	680	2,200	<10	<80	<10	<10	<10	<5,000	<10	<10	<10
MW-12	9/30/2009		40.32	11.02		29.32	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	10/28/2009		40.32	10.40		29.92	--	43,000	5,800	800	2,900	6,800	<50	<400	<50	<50	<50	<10,000	<50	<50	<50
MW-12	3/23/2010	b	40.32	11.46		28.86	--	39,000	4,800	1,000	3,100	6,400	<25	<200	<25	<25	<25	<5,000	<25	<25	<25
MW-12	6/10/2010	b	40.32	11.35		29.87	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	9/16/2010	g	40.32	11.54		28.80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	2/23/2011	g	40.32	10.80		29.60	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	9/28/2011	g	40.32	11.48		28.99	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	3/8/2012	g	40.32	11.92		28.64	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	9/5/2012	g	40.32	11.63		29.76	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW-12	3/20/2013	g	40.32	10.13	10.09	30.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Notes:
1,2-DCA = 1,2-Dichloroethane
DIPE = Di-isopropyl ether
DO= Dissolved oxygen
DRO = Diesel range organics, range C10-C28
DTW = Depth to water in ft bgs
EDB = 1,2-Dibromomethane
ETBE = Ethyl tert butyl ether
GRO = Gasoline range organics, range C4-C12
GWE = Groundwater measured in ft
MTBE = Methyl tert butyl ether
TAME = Ter-amyl methyl ether
TBA = Ter-butyl alcohol
TOC = Top of casing measured in ft

Table 1
Summary of Groundwater Monitoring Data: Relative Water Elevations and Laboratory Analyses
CA-11109
4280 Foothill Blvd., Oakland, CA 94601

Well ID	Date	Notes	TOC (ft msl)	DTW (ft)	DTP	GW Elev (ft msl)	DRO (µg/L)	GRO (µg/L)	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	MTBE (µg/L)	TBA (µg/L)	DIPE (µg/L)	ETBE (µg/L)	TAME (µg/L)	Ethanol (µg/L)	1,2-DCA (µg/L)	EDB (µg/L)
---------	------	-------	-----------------	-------------	-----	---------------------	---------------	---------------	-------------------	-------------------	------------------------	-------------------	----------------	---------------	----------------	----------------	----------------	-------------------	-------------------	---------------

µg/L= Micrograms per liter

ft bgs = Feet below ground surface

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

< = Not detected at or above reported detection limit

(a) Sample exceeded EPA recommended holding time

(b) Sheen in well

(c) Well not sampled due to damage during site construction

(d) Insufficient water to sample

(e) Blind duplicate

(f) TOC lowered

(g) Free product in well

(h) Trip Blank

(i) Hydrocarbon odor observed at wellhead

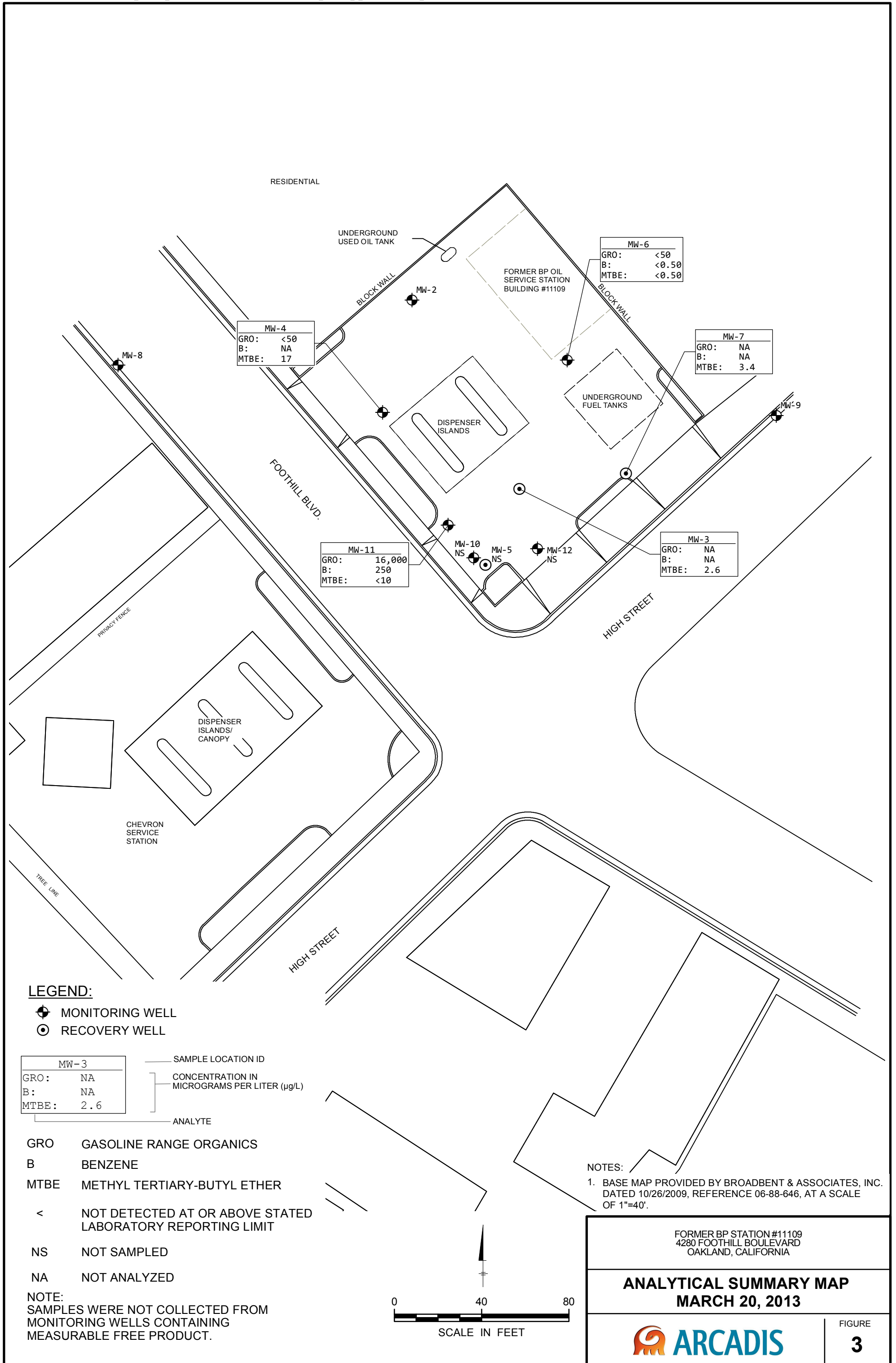
GWE adjusted assuming specific gravity of 0.75 for free product

Beginning in the fourth quarter 2003, the laboratory modified the reported analyte list. TPH-g was changed to GRO. The resulting data may be impacted by the potential of non-TPH-g analytes within the requested fuel range resulting in a higher concentration being reported.

Beginning in the second quarter 2004, the carbon range for GRO was changed from C6-C10 to C4-C12.

GRO analysis was completed by EPA method 8260B (C4-C12) for samples collected from the time period April 2006 through February 4, 2008. The analysis for GRO was changed to EPA method 8015B (C6-C12) for samples collected from the time period February 5, 2008 through the present.

The data within this table collected prior to April 2006 was provided to Broadbent & Associates, Inc. by Atlantic Richfield Company and their previous consultants. Broadbent & Associates, Inc. has not verified the accuracy of this information.





Appendix F

Historical Soil Vapor Data

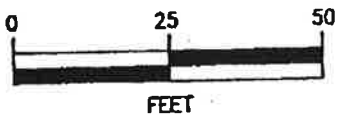
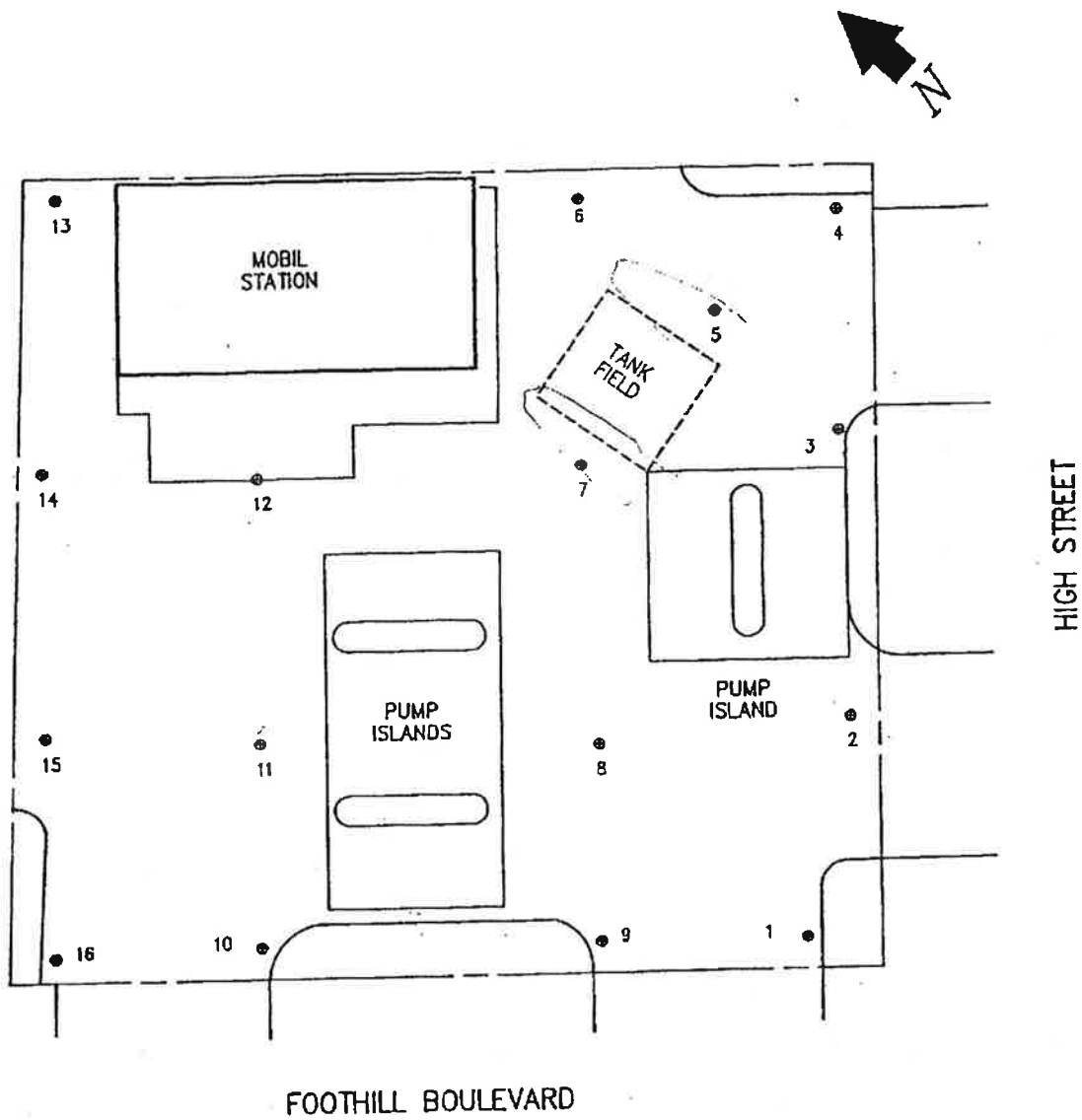
TARGET ENVIRONMENTAL SERVICES, 3/1989

TABLE 1
SOIL GAS
LABORATORY RESULTS
FLAME IONIZATION DETECTOR ANALYSIS
CONCENTRATIONS IN MICROGRAMS-PER-LITER

SAMPLE	PENTANE/ MTBE ¹	BENZENE	TOLUENE	ETHYL- BENZENE	m- & p- XYLENE	o- XYLENE	TOTAL VOLATILES ²
1	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	7.5
2	0.73	0.2	21	13	9.6	8.9	643
3	497	150	91	345	31	33	500
4	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
5	13	<1.0	4.3	<1.0	<1.0	<1.0	13
6	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
7	3.8	<1.0	<1.0	<1.0	<1.0	<1.0	30
8	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
9	2.4	<1.0	3.3	2.4	<1.0	<1.0	29
10	4.5	<1.0	<1.0	<1.0	<1.0	<1.0	89
11	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
12	6.5	<1.0	6.3	<1.0	<1.0	<1.0	28
13	<1.0	<1.0	<1.0	<1.0	1.5	<1.0	19
14	10	3.0	112	64	291	120	550
15	2.9	<1.0	<1.0	<1.0	<1.0	<1.0	25
16	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
FIELD CONTROL SAMPLES							
17	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
18	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
LABORATORY SYRINGE BLANKS							
BM1-1	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
DUPLICATE ANALYSES							
10	4.5	<1.0	<1.0	<1.0	<1.0	<1.0	89
10R	4.1	<1.0	<1.0	<1.0	<1.0	<1.0	84

¹CONCENTRATIONS BASED ON RESPONSE FACTOR OF MTBE

²CALCULATED USING THE SUM OF THE AREAS OF ALL INTEGRATED CHROMATOGRAM PEAKS, AND THE INSTRUMENT RESPONSE FACTOR FOR TOLUENE



• SOIL GAS SAMPLE LOCATION

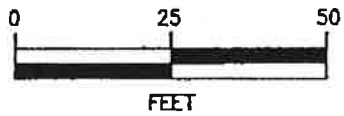
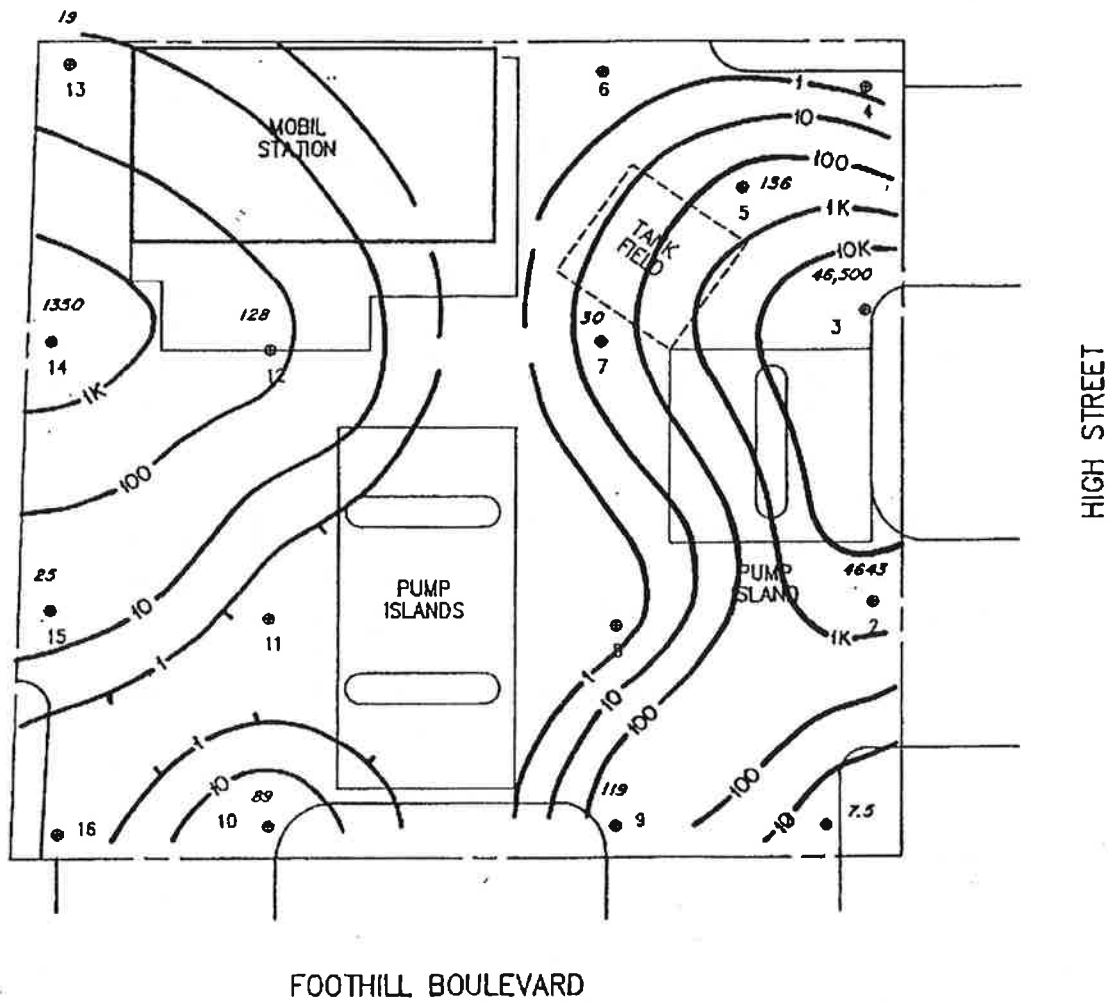
FIGURE 1. Sample Locations



TARGET ENVIRONMENTAL SERVICES, INC.

This map is integral to a written report and should be viewed in that context.

MOBIL SERVICE STATION #10-H69
4280 FOOTHILL BOULEVARD
OAKLAND, CALIFORNIA



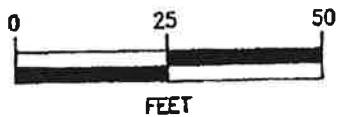
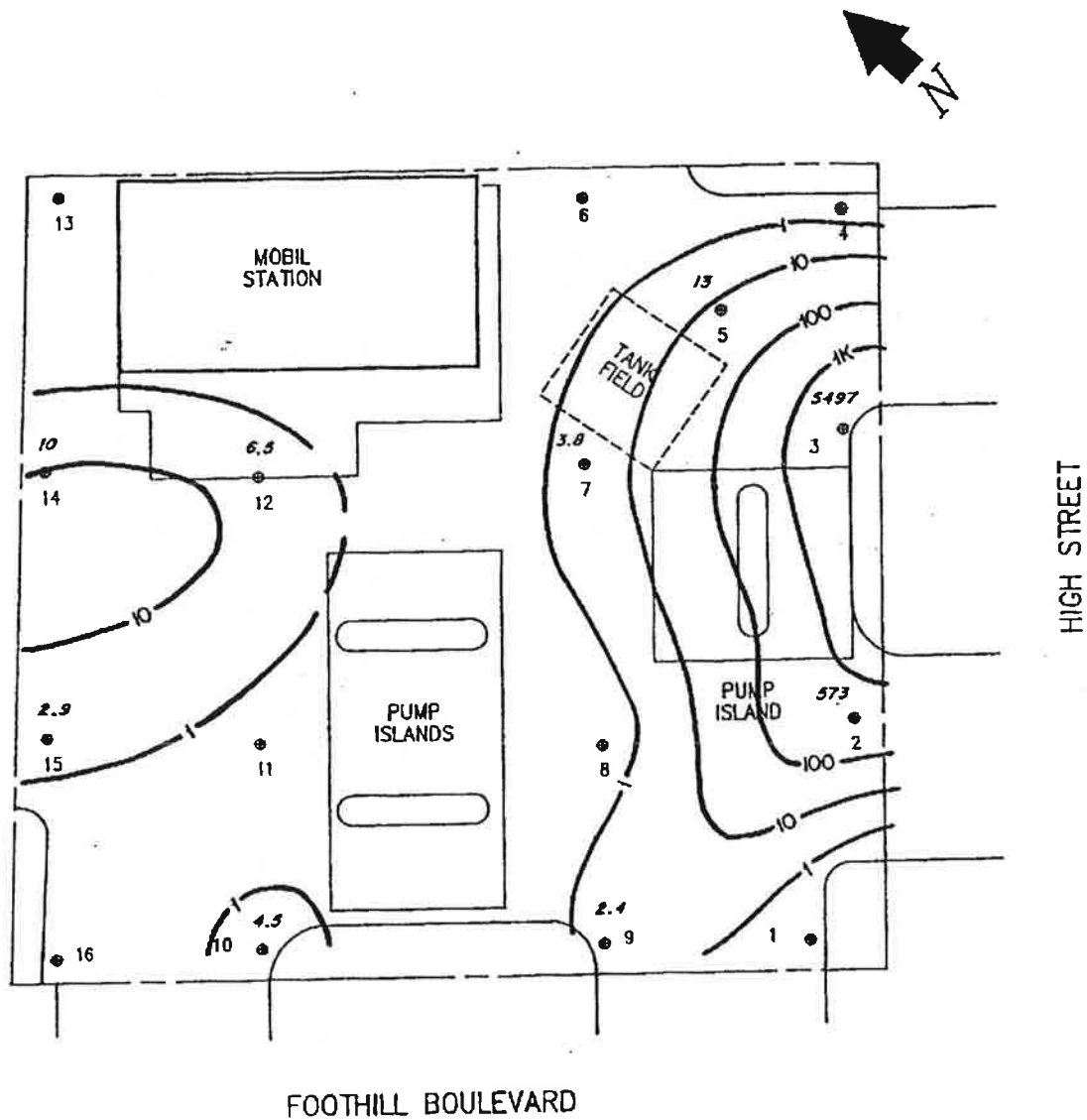
• SOIL GAS SAMPLE LOCATION

FIGURE 2. FID Total Volatiles
 (calc'd $\mu\text{g/l}$)



This map is integral to a written report
 and should be viewed in that context.

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 4280 FOOTHILL BOULEVARD
 OAKLAND, CALIFORNIA



• SOIL GAS SAMPLE LOCATION

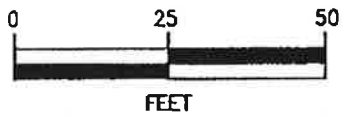
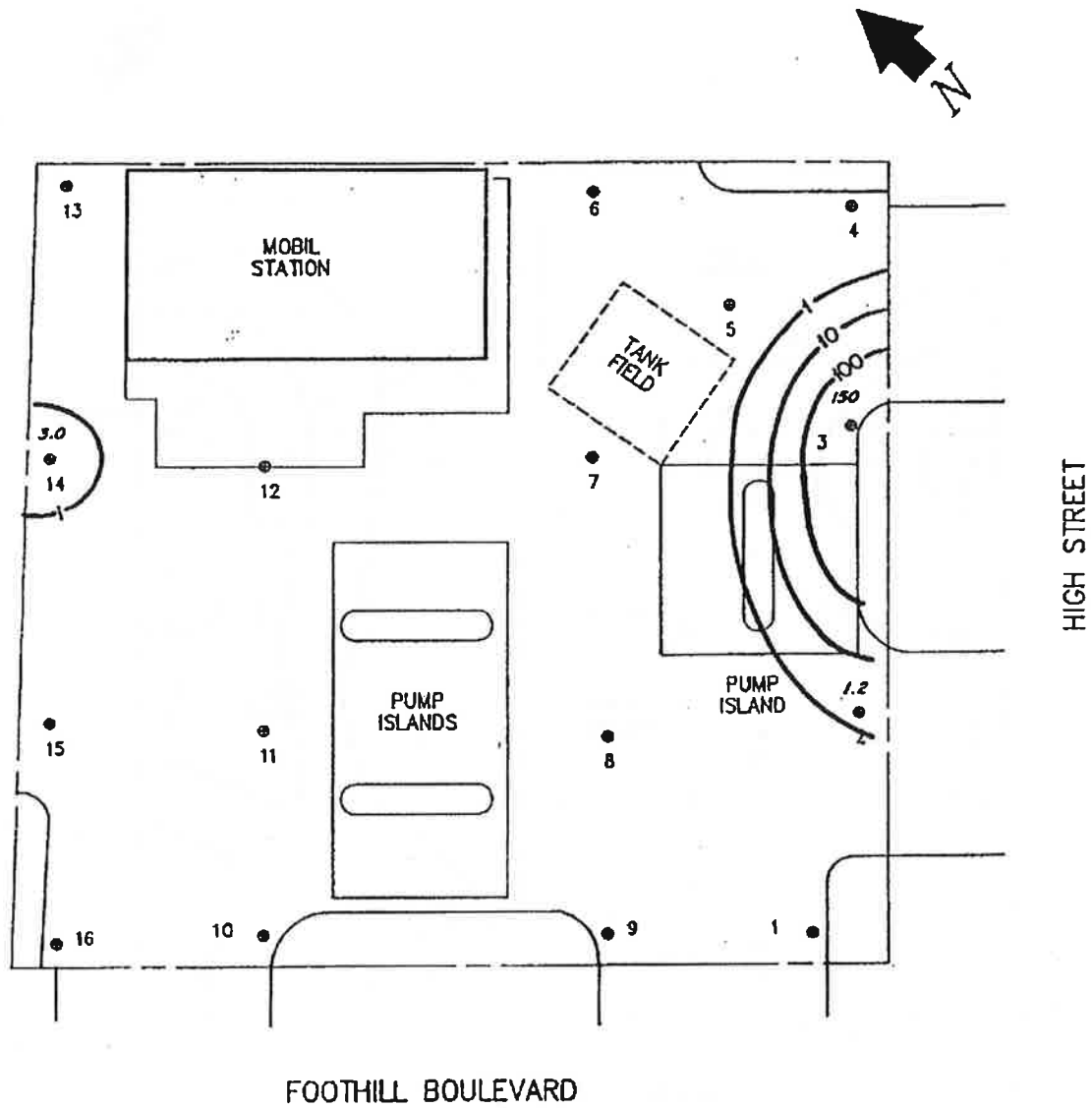
FIGURE 3. MTBE and Pentane
($\mu\text{g}/\text{l}$)



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OAKLAND, CALIFORNIA



• SOIL GAS SAMPLE LOCATION

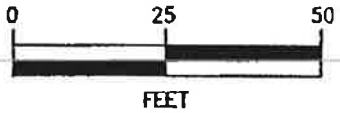
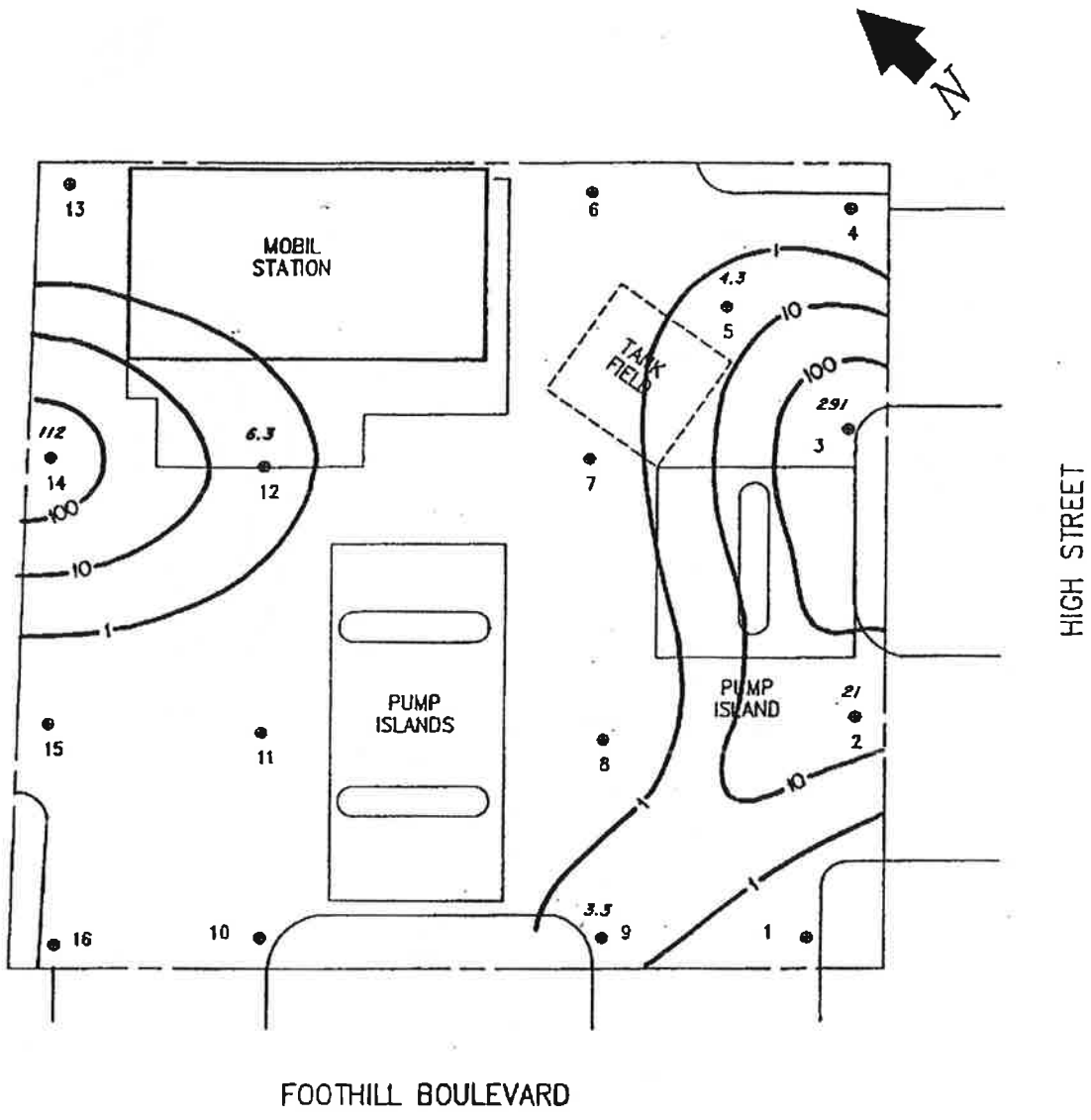
FIGURE 4. Benzene ($\mu\text{g/l}$)



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OAKLAND, CALIFORNIA



• SOIL GAS SAMPLE LOCATION

FIGURE 5. Toluene ($\mu\text{g}/\text{l}$)



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OAKLAND, CALIFORNIA

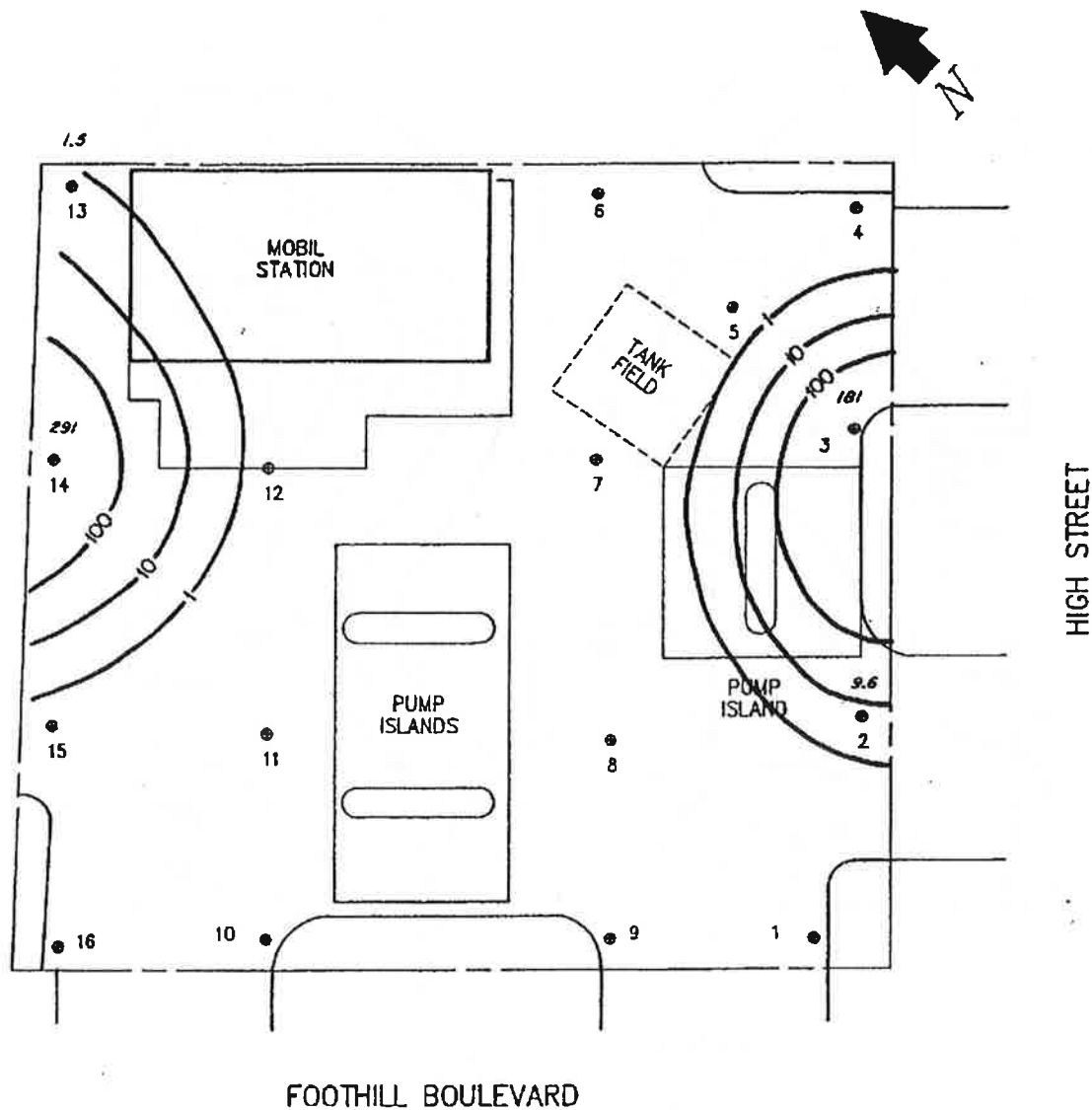


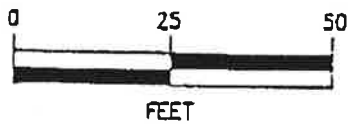
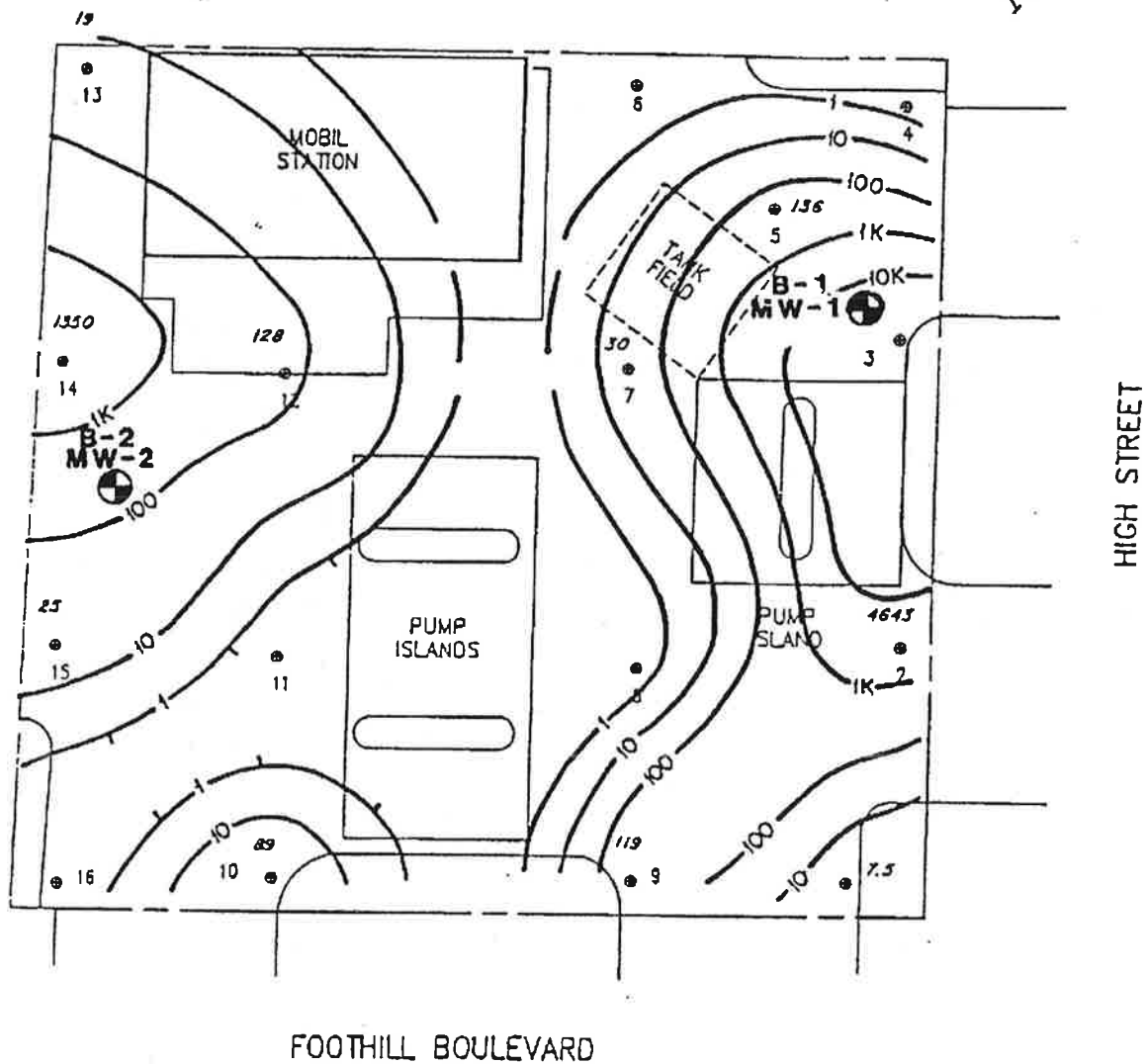
FIGURE 6. m- and p- Xylene
(µg/l)



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OAKLAND, CALIFORNIA



- SOIL GAS SAMPLE LOCATION
- ⊕ APPROXIMATE BORING & WELL LOCATION
- 10— TOTAL VOLATILE CONCENTRATIONS FROM SOIL GAS SURVEY (ug/l)

BASED ON FIGURE PROVIDED BY
TARGET ENVIRONMENTAL SERVICES, INC.

This map is integral to a written report
and should be viewed in that context.

MOBIL SERVICE STATION #10-H69
4280 FOOTHILL BOULEVARD
OAKLAND, CALIFORNIA

SITE & EXPLORATION PLAN

APR 1989

W-6095

FIGURE 1



ACEH Checklists

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA A

General Criteria a:	<input type="checkbox"/> Y	<input type="checkbox"/> N		
Is the Unauthorized Release Located within the Service Area of a Public Water System?	<input type="checkbox"/> Y	<input type="checkbox"/> N		
<p>LTCP Statement: “This policy is protective of <u>existing water supply wells</u>. <u>New water supply wells</u> are unlikely to be installed in the shallow groundwater near former UST release sites. However, it is difficult to predict, on a statewide basis, where new wells will be installed, particularly in rural areas that are undergoing new development. This policy is limited to areas with available public water systems to reduce the likelihood that new wells in developing areas will be inadvertently impacted by residual petroleum in groundwater. Case closure outside of areas with a public water system should be evaluated based upon the fundamental principles in this policy and a site specific evaluation of developing water supplies in the area. For purposes of this policy, a <u>public water system</u> is a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.”</p>				
If the unauthorized release is <u>located within</u> the service area of a public water supply system, then				
Name of public water system agency?				
East Bay Municipal Utility District	<input type="checkbox"/> Y			
Zone 7 Water Agency	<input type="checkbox"/> Y			
City of Hayward Water	<input type="checkbox"/> Y			
Alameda County Water District	<input type="checkbox"/> Y			
Other:	<input type="checkbox"/> Y			
Are there existing water supply wells or other sources of water in the vicinity of the site? Use General Criteria e – CSM Well Survey sheet to support answer	<input type="checkbox"/> Y	<input type="checkbox"/> N		
<i>Note: If yes, the site must still satisfy the groundwater media specific criteria for distance from the contaminant plume boundary to existing wells</i>		<input type="checkbox"/> NE		
If the unauthorized release is <u>located outside</u> the service area of a public water supply system, then				
Are there additional characteristics to consider that might result in a low-threat designation?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a site-specific evaluation of developing water supplies in the area been conducted?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is impacted groundwater shallower than the sanitary seal requirement for supply wells in the applicable county?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Applicable County Sanitary Seal Requirements:				
Are impacted perched water zones not a viable potential water supply?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does high salinity or low yield negate the impacted groundwater from drinking water beneficial use per State Water Board Resolution 1988-0063, or de-designated areas of the applicable Basin Plans?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Will Water Quality Objectives (WQOs) in the groundwater plume be attained through natural attenuation within a reasonable time, prior to the expected need for use of any affected groundwater?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA A

General Criteria a: Case Notes

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA B

General Criteria b:	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> NE
Does the Unauthorized Release Consist only of Petroleum?			
<p>LTCP Statement: “For purposes of this policy, petroleum is defined as crude oil, or any fraction thereof, which is liquid at standard conditions and temperature and pressure, which means 60 degrees Fahrenheit and 14.7 pounds per square inch absolute including the following substances: motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, petroleum solvents and used oils, including any additives and blending agents such as oxygenates contained in the formulation of the substances.”</p>			
Have adequate site investigation activities been conducted to evaluate unauthorized releases of potential chemicals of concern (PCOCs) and chemicals of concern (COCs) from on-site sources due to historical site activities and chemical usage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have areas of concern been identified based on historical site activities and chemical usage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have unauthorized releases from underground storage tanks been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have unauthorized releases from above ground storage tanks been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have unauthorized releases from site infrastructure (i.e., sumps, drains, sanitary sewer, etc) been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have unauthorized releases from surface spills at dispenser islands, tank fill ports, etc. been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have unauthorized releases from other on-site sources been identified?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Has the site been impacted by off-site sources?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Are detected COCs <u>consistent</u> with reported site use?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
If detected COCs <u>are not consistent</u> with reported site use, then are there other regulatory cases in the vicinity of the site? Identify regulatory case number(s): <input style="width: 50%; height: 20px;" type="text"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
If there <u>are not other regulatory cases</u> in the vicinity of the site, then has an investigation of other potential sources and contaminant migration pathways been conducted? <i>Use General Criteria e – Conceptual Site Model (Off-site sources) sheets to support answer</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Has site contamination in all affected media been fully characterized? <i>Use page b-2 and General Criteria e – Conceptual Site Model COCs and PCOCs sheets to identify site contaminants</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Soil?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Soil Gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Groundwater?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Surface Water?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Has a data quality review verified the validity of historic analytical data? <i>Use General Criteria e – Conceptual Site Model Analytical Data Quality Review sheets to support answers</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have appropriate protocols been followed for obtaining representative samples?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Are the analytical methods currently being used consistent with the recommended “best practices” in the CA LUFT Manual?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA
Have appropriate method detection limits been used (i.e., less than the LTCP media specific criteria for groundwater, vapor intrusion to indoor air, and direct contact and outdoor air exposure, and/or current environmental screening levels as appropriate?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE <input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

General Criteria b: Case Notes

Case File Reference Documents:

Attachments:

Case Notes:

LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

Chemicals of Concern (COCs - detected) and Potential Chemicals of Concern (PCOCs – i.e., not detected but used in site operations) in Soil, Groundwater, Soil Gas, and/or Surface Water¹

PETROLEUM HYDROCARBON SOURCE TYPE(S)																
COC/PCOC	Soil				Groundwater				Soil Gas <input checked="" type="checkbox"/> Crawl Space <input type="checkbox"/> Indoor Air <input type="checkbox"/>				Surface Water			
	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Gasoline²	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Fuel Oils³	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Diesel	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Stoddard Solvent	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Jet Fuels	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Kerosene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Home Heating Fuel	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Bunker Fuel	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Oils	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Waste Oil ⁴	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hydraulic Oil	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Lubricating Oil	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Oil and Grease	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Motor Oil	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water¹

TOTAL PETROLEUM HYDROCARBON – GASOLINE RELATED CONSTITUENTS²

COC/PCOC	Soil				Groundwater				Soil Gas, Crawl Space or Indoor Air				Surface Water			
	Y	N	NE	NA	Y	N	NE	NA	Y	N	NE	NA	Y	N	NE	NA
TPH																
TPH-g	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aromatics																
Benzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toluene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethylbenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Xylenes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Napthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oxys⁵																
MTBE ⁶	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ETBE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TAME	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TBA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DIPE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethanol	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Methanol	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leaded Gas																
TML ⁷	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EDC ⁸	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EDB ⁸	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water¹

TOTAL PETROLEUM HYDROCARBONS – DIESEL, JET FUEL, AND OTHER FUEL OIL RELATED CONSTITUENTS ³																
COC/PCOC	Soil				Groundwater				Soil Gas <input checked="" type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	TPH															
TPH-d	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
DRO	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
TEPH	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Aromatics																
Benzene	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Toluene	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Xylenes	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input checked="" type="checkbox"/> NE	<input type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Others																
PAHs ⁹	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water¹

WASTE (USED) OILS ⁴																
COC/PCOC	Soil				Groundwater				Soil Gas <input checked="" type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	Y	N	NE	NA	Y	N	NE	NA	Y	N	NE	NA	Y	N	NE	NA
TPH																
TPH-g	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GRO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TPH-d	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DRO	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TPH-mo	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEPH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MORO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aromatics																
Benzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toluene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethylbenzene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Xylenes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Napthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oxys																
MTBE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TBA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wear Metals¹⁰																
Total Lead	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Zinc	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others																
CVOCs ¹¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PCBs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PCPs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dioxins & Furans ¹²	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water¹

NON PETROLEUM HYDROCARBON SOURCE - RELATED CONTAMINANTS																
COC/PCOC	Soil				Groundwater				Soil Gas <input type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
VOCs ¹¹	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
SVOCs ¹³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
OCPs ¹⁴	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Herbicides ¹⁵	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Metals ¹⁶	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA

REMEDICATION - RELATED BYPRODUCTS																
COC/PCOC	Soil				Groundwater				Soil Gas <input type="checkbox"/> , Crawl Space <input type="checkbox"/> , Indoor Air <input type="checkbox"/>				Surface Water			
	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Remediation Byproducts	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Chromium VI	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Other Metals ¹⁶	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA
Others	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input checked="" type="checkbox"/> NA

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LOW THREAT CLOSURE POLICY – CONCEPTUAL SITE MODEL

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water

VOLATILE ORGANIC COMPOUNDS									
Compound	S	SG	GW	SW					
Benzene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bromobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bromochloromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bromodichloromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bromoform	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bromomethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n-Butylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
sec-Butylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
tert-Butylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Carbon tetrachloride	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chlorodibromomethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chloroform	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chloromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2-Chlorotoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4-Chlorotoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2-Dibromo-3-chloropropane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2-Dibromoethane	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dibromomethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,3-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,4-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Dichlorodifluoromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1-Dichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1,2-Dichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1-Dichloroethene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
cis-1,2-Dichloroethene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
trans-1,2-Dichloroethene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2-Dichloropropane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2,2-Dichloropropane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,3-Dichloropropane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1-Dichloropropene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ethylbenzene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hexachlorobutadiene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Isopropylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
p-Isopropyltoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Methylene chloride	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Naphthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n-Propylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Styrene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1,1,2-Tetrachloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1,2,2-Tetrachloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tetrachloroethene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Toluene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1,2,4-Trichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2,3-Trichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1,1-Trichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1,2-Trichloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Trichloroethene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Trichlorofluoromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2,3-Trichloropropane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2,4-Trimethylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,3,5-Trimethylbenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vinyl chloride	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o-Xylene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m-Xylene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
p-Xylene	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Methyl-t-butyl ether	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dichlorofluoromethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- Key:
- Y = Detected at site
 - N = Tested for but never detected (method reporting limit less than current screening levels – validated by case review)
 - NE = Identified Data Gap - Needs Further Evaluation (Tested for but never detected (method reporting limit greater than current screening levels)
 - NA = Not Applicable (never present at site – validated by case review)

LOW THREAT CLOSURE POLICY – CONCEPTUAL SITE MODEL

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water

SEMI-VOLATILE ORGANIC COMPOUNDS

Compound	S	SG	GW	SW				
1,2-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
1,2,4-Trichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
1,3-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
1,4-Dichlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Chloronaphthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Chlorophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Methylnaphthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Methylphenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Nitroaniline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2-Nitrophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,2'-oxybis (1-Chloropropane)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dichlorophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dimethylphenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dinitrophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4-Dinitrotoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4,5-Trichlorophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,4,6-Trichlorophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
2,6-Dinitrotoluene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
3-Nitroaniline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
3,3'-Dichlorobenzidine	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Bromophenyl-phenylether	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Chloro-3-methylphenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Chloroaniline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Chlorophenyl-phenyl ether	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Methylphenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Nitroaniline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4-Nitrophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
4,6-Dinitro-2-methylphenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Acenaphthene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Acenaphthylene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Anthracene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(a)anthracene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Compound	S	SG	SW	GW				
Benzo(a)pyrene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(b)fluoranthene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(g,h,i)perylene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzo(k)fluoranthene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
bis(2-Chloroethoxy)-methane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
bis(2-Chloroethyl) ether	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
bis(2-Ethylhexyl)phthalate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Butylbenzylphthalate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Carbazole	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Chrysene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Di-n-butylphthalate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Di-n-octylphthalate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dibenz(a,h)anthracene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dibenzofuran	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Diethylphthalate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Dimethylphthalate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Fluoranthene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Fluorene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachlorobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachlorobutadiene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachlorocyclopentadiene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Hexachloroethane	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Indeno(1,2,3-cd)pyrene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Isophorone	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
N-Nitroso-di-n-propylamine	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
N-nitrosodiphenylamine	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Naphthalene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Nitrobenzene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Pentachlorophenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Phenanthrene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Phenol	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Pyrene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

- Key:
- Y = Detected at site
 - N = Tested for but never detected (method reporting limit less than current screening levels – validated by case review)
 - NE = Identified Data Gap - Needs Further Evaluation (Tested for but never detected (method reporting limit greater than current screening levels))
 - NA = Not Applicable (never present at site – validated by case review)

LOW THREAT CLOSURE POLICY – GENERAL CRITERIA B

Chemicals of Concern (COCs) and Potential Chemicals of Concern (PCOCs) in Soil, Groundwater, Soil Gas, and/or Surface Water¹

Notes:

CVOCS = Chlorinated Volatile Organic Compounds

DIPE = di-isopropyl ether

EDC (ethylene dichloride) or 1,2-DCA (1,2-dichloroethane or ethylene dibromide)

EDB = 1,2-dibromomethane

ETBE = ethyl tert butyl ether

MTBE = methyl tert butyl ether (banned in CA since 2004)

OCPs = Organochlorine Pesticides

PAH = Polycyclic Aromatic Hydrocarbons or Polynuclear Aromatic Hydrocarbons

PCPs = Pentachlorophenol (wood preservative)

TAME = tert amyl methyl ether

TBA = t-Butyl Alcohol

TEL = tetra ethyl lead

TML = tetra methyl lead

SVOCs = Semi-volatile Organic Compounds

VOCs = Volatile Organic Compounds

- 1 = The analytes listed below are recommended in the CA LUFT Manual to ensure that site characterization is complete. Note that more analytes are recommended than are used as "criteria" chemicals in the LTCP for the various media.
- 2 = **CA LUFT Manual recommended analyses for gasoline releases** include BTEX, naphthalene, and fuel oxygenates (MTBE and TBA) and/or lead scavengers if gasoline release was pre-1992.
- 3 = **CA LUFT Manual recommended analyses for fuel oil releases** include BTEX, and naphthalene. Additionally, for heavy fuel oil such as bunker fuel the priority pollutant PAHs should be added to the list of analytes.
- 4 = **CA LUFT Manual recommended analyses for waste (used) motor oils** include BTEX, the 16 priority pollutant PAHs, chlorinated solvents (which will include EDB and EDC), and fuel oxygenates (MTBE and TBA). For soil only analysis for the five "wear metals" is also recommended.
- 5 = ACEH recommended analysis of all fuel oxygenates
- 6 = MTBE to be analyzed at all LUFT sites unless the tank contained only diesel or jet fuel per California Health and Safety Code 25296.15(a). MTBE was added to gasoline in California starting in approximately the late 1980's/early 1990's and was banned in 2004.
- 7 = Samples to be analyzed for tetra methyl lead
- 8 = Samples to be initially analyzed for lead scavengers EDC and EDB for all release sites and fuel oxygenates
- 9 = Use page b-8 to identify priority PAHs
- 10 = Wear metals need only be analyzed for soil
- 11 = Use page b-7 to identify specific VOCs
- 12 = Analyzed for dioxins and furans if PCBs and/or PCPs are detected
- 13 = Use page b-8 to identify specific SVOCs
- 14 = Use page b- to identify OCPs
- 15 = Use page b- to identify herbicides
- 16 = Use page b- to identify metals (in addition to the 5 wear metals)

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA C

General Criteria c: Has the Unauthorized (“Primary”) Release from the UST System been Stopped?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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LTCP Statement: “The tank, pipe, or other appurtenant structure that released petroleum into the environment (i.e. the primary source) has been removed, repaired or replaced. It is not the intent of this policy to allow sites with ongoing leaks from the UST system to qualify for low-threat closure.”

Fuel Dispensing Facility History (list in chronological order, starting with operational in-place tanks)

	Contents (gas - (leaded, unleaded), diesel, waste oil, etc.)	Type (steel, fiberglass single- walled, double- walled)	Evidence of Release? (Y/N)	Closed in Place, Removed, or Upgraded?	Responsible Party (Organization Name, Type)	Date Installed	Date Removed
Tank (capacity in gallons)							
Piping							
Dispensers							
Other Structures							

Is the site currently an operating fuel dispensing facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have there been multiple tank system locations at the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have there been multiple releases at the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Was there a previous/different regulatory case at this site? Identify previous case number: <div style="border: 1px solid black; height: 20px; width: 50%; margin-top: 5px;"></div>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there evidence of releases from other on-site sources besides the UST system(s)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there indication of impacts from offsite sources?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use General Criteria e – Conceptual Site Model (Sources) sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA C

General Criteria c:

Has the Unauthorized (“Primary”) Release from the UST System been Stopped?

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA D

General Criteria d:				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has Free Product been Removed to the Maximum Extent Practicable?							
<p>LTCP Statement: "At petroleum unauthorized release sites where investigations indicate the presence of free product, free product shall be removed to the maximum extent practicable. In meeting the requirements of this section:</p> <p>(a) Free product shall be removed in a manner that minimizes the spread of the unauthorized release into previously uncontaminated zones by using recovery and disposal techniques appropriate to the hydrogeologic conditions at the site, and that properly treats, discharges or disposes of recovery byproducts in compliance with applicable laws;</p> <p>(b) Abatement of free product migration shall be used as a minimum objective for the design of any free product removal system; and</p> <p>(c) Flammable products shall be stored for disposal in a safe and competent manner to prevent fires or explosions."</p>							
Has free product (migrating of mobile LNAPL) been detected in site monitoring wells?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
MW ID	Date FP First Observed	Max FP Apparent Thickness (feet), sheen, or globules	Most Recently Observed FP Apparent Thickness (feet)	Date of Most Recent FP Observation			
Has a description of the standard operating procedures used to measure free product in wells been provided?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an adequate LNAPL Conceptual Site Model been developed?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Was free product observed during tank removal activities or station upgrades?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an evaluation of the adequacy of the monitoring well network and appropriateness of screen interval to detect free product been conducted?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have there been other indications of the presence of free product (i.e., observations during tank removal, observations during exploratory drilling, bore logs, dissolved phase concentrations of COCs greater than their effective solubility's in groundwater, etc.)				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a preferential pathway study been conducted to determine the probability of free product encountering geologic and anthropogenic preferential pathways and conduits that can act as contaminant migration pathways to or from the site?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has the LNAPL body spatial distribution (horizontal and vertical) been defined?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are there risk and exposure issues attributed to the presence of the LNAPL?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an evaluation of whether free product removal is practicable, or if not practicable, a description of the conditions that prevent free product removal been conducted?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Use General Criteria e - Conceptual Site Model (Free Product) sheets to support answer							
Has free product removal been implemented?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Location/ MW ID	Method (Absorbent Materials, Bailing, Skimmer, DPE, Excavation, etc.)	Cumulative Gallons/Volume/Mass Removed		Dates Implemented			
Does data indicate rebound of free product subsequent to product removal?				<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA D

General Criteria d:

Has Free Product been Removed to the Maximum Extent Practicable?

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA E

General Criteria e:			<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE						
Has a Conceptual Site Model that Assesses the Nature, Extent, and Mobility of the Release been Developed?			<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE						
<p>LTCP Statement: "The Conceptual Site Model (CSM) is a fundamental element of a comprehensive site investigation. The CSM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The CSM is relied upon by practitioners as a guide for investigative design and data collection. Petroleum release sites in California occur in a wide variety of hydrogeologic settings. As a result, contaminant fate and transport and mechanisms by which receptors may be impacted by contaminants vary greatly from location to location. Therefore, the CSM is unique to each individual release site. All relevant site characteristics identified by the CSM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy. The supporting data and analysis used to develop the CSM are not required to be contained in a single report and may be contained in multiple reports submitted to the regulatory agency over a period of time."</p>											
Has a CSM been prepared that is representative of current site conditions?			<input type="checkbox"/> Y	<input type="checkbox"/> N							
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:50%;">Document Title</th> <th style="width:25%;">Author</th> <th style="width:25%;">Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>			Document Title	Author	Date						
Document Title	Author	Date									
<p><i>If the CSM is provided in multiple documents, provide additional document titles, authors and dates in the Case File Reference document section on page e-2</i></p>											
Is the CSM <u>comprehensive</u> enough to show compliance with all the LTCP criteria and that final closure review is appropriate?			<input type="checkbox"/> Y	<input type="checkbox"/> N							
General Criteria											
a	The unauthorized release is located within the service area of a public water system		<input type="checkbox"/> Y	<input type="checkbox"/> N							
b	The unauthorized release consists only of petroleum		<input type="checkbox"/> Y	<input type="checkbox"/> N							
c	The unauthorized ("primary") release from the UST system has been stopped		<input type="checkbox"/> Y	<input type="checkbox"/> N							
d	Free product has been removed to the maximum extent practicable		<input type="checkbox"/> Y	<input type="checkbox"/> N							
e	A CSM that assesses the nature, extent, and mobility of the release has been developed		<input type="checkbox"/> Y	<input type="checkbox"/> N							
f	Secondary source has been removed to the extent practicable		<input type="checkbox"/> Y	<input type="checkbox"/> N							
g	Soil or groundwater has been tested for MTBE and results reported in accordance with Health and Safety Code section 25296.15		<input type="checkbox"/> Y	<input type="checkbox"/> N							
h	Nuisance as defined by Water Code section 13050 does not exist at the site		<input type="checkbox"/> Y	<input type="checkbox"/> N							
Media-Specific Criteria											
Groundwater			<input type="checkbox"/> Y	<input type="checkbox"/> N							
Vapor Intrusion to Indoor Air			<input type="checkbox"/> Y	<input type="checkbox"/> N							
Direct Contact and Outdoor Air Exposure			<input type="checkbox"/> Y	<input type="checkbox"/> N							
If the CSM is <u>not comprehensive</u> enough to show compliance with all the LTCP criteria, then											
Has a data gap investigation work plan been prepared that is guided by the CSM?			<input type="checkbox"/> Y	<input type="checkbox"/> N							
Has a path to closure plan been prepared that is guided by the CSM?			<input type="checkbox"/> Y	<input type="checkbox"/> N							

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA E

General Criteria e: Case Notes

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA F

General Criteria f:	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
Has Secondary Source been Removed to the Extent Practicable?			

LTCP Statement: "Secondary source" is defined as petroleum-impacted soil or groundwater located at or immediately beneath the point of release from the primary source. Unless site attributes prevent secondary source removal (e.g. physical or infrastructural constraints exist whose removal or relocation would be technically or economically infeasible), petroleum-release sites are required to undergo secondary source removal to the extent practicable as described herein. "To the extent practicable" means implementing a cost-effective corrective action which removes or destroys-in-place the most readily recoverable fraction of source-area mass. It is expected that most secondary mass removal efforts will be completed in one year or less. Following removal or destruction of the secondary source, additional removal or active remedial actions shall not be required by regulatory agencies unless (1) necessary to abate a demonstrated threat to human health or (2) the groundwater plume does not meet the definition of low threat as described in this policy."

Has corrective action been implemented at the site to remove or destroy-in-place the most readily recoverable fraction of source-area mass?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Soil remediation	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Method	Mass/Volume Removed	Dates of Implementation

If soil remediation is currently being conducted, then is it progressing adequately?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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If soil remediation is no longer being conducted then, has confirmation sampling results confirmed that additional corrective actions are not necessary?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
--	----------------------------	----------------------------	-----------------------------	-----------------------------

Are additional soil remedial actions necessary to meet the media-specific criteria of the Policy or to abate a demonstrated threat to human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Groundwater Remediation	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Method	Mass/Volume Removed	Dates of Implementation

If groundwater remediation is currently being conducted, then is it progressing adequately?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
---	----------------------------	----------------------------	-----------------------------	-----------------------------

If groundwater remediation is no longer being conducted then, has verification monitoring confirmed that additional corrective actions are not necessary?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Are additional groundwater remedial actions necessary to meet the media-specific criteria of the Policy or to abate a demonstrated threat to human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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Use sheet f-2 - Maximum Detected Contaminant Concentrations Before and After Corrective Action to support your answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA F

General Criteria f: Case Notes

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA G

General Criteria g:				
Has Soil or Groundwater been Tested for MTBE and Results Reported in Accordance with Health and Safety Code Section 25296.15?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

LTCP Statement: "Health and Safety Code section 25296.15 prohibits closing a UST case unless the soil, groundwater, or both, as applicable have been tested for MTBE and the results of that testing are known to the Regional Water Board. The exception to this requirement is where a regulatory agency determines that the UST that leaked has only contained diesel or jet fuel. Before closing a UST case pursuant to this policy, the requirements of section 25296.15, if applicable, shall be satisfied."

Exemption - Has sufficient data been presented to determine that the UST that leaked has only contained diesel or jet fuel?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
--	----------------------------	----------------------------	-----------------------------	-----------------------------

If the site does not qualify for the exemption then

Has sufficient data been presented to assess whether MTBE is or was present in soil at or in the vicinity of the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been presented to assess whether MTBE is or was present in groundwater at or in the vicinity of the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have all results been verified by the appropriate analytical laboratory method?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use General Criteria b pages b-3 and General Criteria e – Conceptual Site Model sheets to support answer

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA H

General Criteria h:	<input type="checkbox"/> Y	<input type="checkbox"/> N		<input type="checkbox"/> NE
Does a Nuisance as Defined by Water Code Section 13050 Exist at the Site?				
<p>LTCP Statement: "Water Code section 13050 defines "nuisance" as anything which meets <u>all</u> of the following requirements:</p> <p>(1) Is injurious to health, <u>or</u> is indecent or offensive to the senses, <u>or</u> an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.</p> <p>(2) Affects at the same time an entire community or neighborhood, <u>or</u> any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.</p> <p>(3) Occurs during, <u>or</u> as a result of, the treatment <u>or</u> disposal of wastes.</p> <p>For the purpose of this policy, waste means a petroleum release."</p>				
Does a nuisance condition currently exist (or potentially could exist) that meets all of the following criteria?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is injurious to health? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is indecent or offensive to the senses? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is an obstruction to the free use of property so as to interfere with the comfortable enjoyment of life or property?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Affects at the same time an <u>entire community</u> , although the extent of the annoyance or damage inflicted upon individuals may be unequal? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Affects at the same time an <u>entire neighborhood</u> , although the extent of the annoyance or damage inflicted upon individuals may be unequal? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Affects at the same time <u>any considerable number of persons</u> , although the extent of the annoyance or damage inflicted upon individuals may be unequal?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs during the treatment of waste? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs during the disposal of waste? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs as a result of the treatment of waste? <i>-OR-</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Occurs as a result of the disposal of waste?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has an evaluation of whether site contamination is present in locations that have the potential to pose nuisance conditions during common or reasonably expected site activities been conducted?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Surface soils?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Utility corridors?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Groundwater?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Surface water?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Soil gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Basements or other subsurface structures?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
<p><i>Use the following to support your answer:</i></p> <ul style="list-style-type: none"> • <i>General Criteria a (site located within a service area of a public water supply system)</i> • <i>General Criteria b (identified chemicals of concern and potential chemicals of concern)</i> • <i>General Criteria d (free product evaluation)</i> • <i>General Criteria e (results of preferential pathway and sensitive receptor survey)</i> • <i>Media Specific Criteria for Groundwater</i> • <i>Media Specific Criteria for Vapor Intrusion to Indoor Air</i> • <i>Media Specific Criteria for Direct Contact and Outdoor Air Exposure</i> 				

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

LOW THREAT CLOSURE POLICY - GENERAL CRITERIA H

General Criteria h: Case Notes

Case File Reference Documents:

Attachments:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

Does the site qualify for the Soil Only Case exemption? -OR-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
Does the site satisfy the Media-Specific Criteria for Groundwater?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE

LTCP Statement: “This policy describes criteria on which to base a determination that threats to existing and anticipated beneficial uses of groundwater have been mitigated or are de minimis, including cases that have not affected groundwater.

State Water Board Resolution 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304* is a state policy for water quality control and applies to petroleum UST cases. Resolution 92-49 directs that water affected by an unauthorized release attain either background water quality or the best water quality that is reasonable if background water quality cannot be restored. Any alternative level of water quality less stringent than background must be consistent with the maximum benefit to the people of the state, not unreasonably affect current and anticipated beneficial use of affected water, and not result in water quality less than that prescribed in the water quality control plan for the basin within which the site is located. Resolution No. 92-49 does not require that the requisite level of water quality be met at the time of case closure; it specifies compliance with cleanup goals and objectives within a reasonable time frame.

Water quality control plans (Basin Plans) generally establish “background” water quality as a restorative endpoint. This policy recognizes the regulatory authority of the Basin Plans but underscores the flexibility contained in Resolution 92-49.

It is a fundamental tenet of this low-threat closure policy that if the closure criteria described in this policy are satisfied at a petroleum unauthorized release site, attaining background water quality is not feasible, establishing an alternate level of water quality not to exceed that prescribed in the applicable Basin Plan is appropriate, and that water quality objectives will be attained through natural attenuation within a reasonable time, prior to the expected need for use of any affected groundwater.

If groundwater with a designated beneficial use is affected by an unauthorized release, to satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed below. A plume that is “stable or decreasing” is a contaminant mass that has expanded to its maximum extent: the distance from the release where attenuation exceeds migration.”

“Sites with Releases that Have Not Affected Groundwater - Sites with soil that does not contain sufficient mobile constituents [leachate, vapors, or light non-aqueous-phase liquids (LNAPL)] to cause groundwater to exceed the groundwater criteria in this policy shall be considered low-threat sites for the groundwater medium. Provided the general criteria and criteria for other media are also met, those sites are eligible for case closure. For older releases, the absence of current groundwater impact is often a good indication that residual concentrations present in the soil are not a source for groundwater pollution.”

Has adequate data been collected to demonstrate that soil does not contain sufficient mobile constituents to cause groundwater to exceed the groundwater criteria in this policy?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE															
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">Leachate?</td> <td style="width: 12.5%; text-align: center;"><input type="checkbox"/> Y</td> <td style="width: 12.5%; text-align: center;"><input type="checkbox"/> N</td> <td style="width: 12.5%; text-align: center;"><input type="checkbox"/> NE</td> <td style="width: 12.5%; text-align: center;"><input type="checkbox"/> NA</td> </tr> <tr> <td>Soil gas?</td> <td style="text-align: center;"><input type="checkbox"/> Y</td> <td style="text-align: center;"><input type="checkbox"/> N</td> <td style="text-align: center;"><input type="checkbox"/> NE</td> <td style="text-align: center;"><input type="checkbox"/> NA</td> </tr> <tr> <td>LNAPL?</td> <td style="text-align: center;"><input type="checkbox"/> Y</td> <td style="text-align: center;"><input type="checkbox"/> N</td> <td style="text-align: center;"><input type="checkbox"/> NE</td> <td style="text-align: center;"><input type="checkbox"/> NA</td> </tr> </table>	Leachate?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	Soil gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA	LNAPL?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA			
Leachate?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA														
Soil gas?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA														
LNAPL?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA														
If the site does not qualify for the soil only exemption, then Does groundwater in the vicinity of the site have beneficial use designations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE															

Use General Criteria e – Conceptual Site Model sheets to support answer

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

GROUNDWATER PLUME STABILITY				
If the site <u>does not</u> qualify for the soil only exemption, and groundwater has designated beneficial uses, then,				
Is the contaminant plume stable or decreasing in areal extent?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Technical Justification for Groundwater Media-Specific Criteria: "A plume is considered stable or decreasing if a contaminant mass has expanded to its maximum extent: the distance from the release where attenuation exceeds migration. There are two common ways to demonstrate plume stability. The first common way is to routinely observe non-detect values for groundwater parameters in down-gradient wells. The second common way is to show stable or decreasing concentration levels in down-gradient wells at the distal end of the plume. It should be noted that concentration levels may exhibit fluctuation due to seasonal variations. These variations may be also attributed to man-made factors, including but not limited to: varying sampling techniques, false positive results, or laboratory inconsistencies."

"Requiring that a plume must be stable or decreasing reduces uncertainty as to how long the plume might become in the future."

Has the maximum stabilized plume length been defined?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have non-detect values for groundwater parameters in down-gradient wells at the distal end of the plume been routinely observed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

MW ID's	Dates of GW Monitoring Events Demonstrating Non-Detect Values?

Have stable or decreasing concentration levels in down-gradient wells at the distal end of the plume been routinely observed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
---	----------------------------	----------------------------	-----------------------------	-----------------------------

MW ID's	Dates of GW Monitoring Events Demonstrating Stability?

Do concentration levels exhibit fluctuations due to seasonal variations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Do concentration levels exhibit fluctuations due to man- made factors?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Varying Sampling Techniques?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
False Positive Results?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Laboratory Inconsistencies?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

GROUNDWATER CONTAMINANT PLUME CLASSIFICATION CHARACTERISTICS

If the Contaminant Plume is Stable or Decreasing, then

Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of at least one of the five (5) LTCP classes listed below?

Y

N

NE

NA

	Plume Length ¹ (feet)	Free Product Remaining ² (Yes/No)	Distance of Nearest Water Supply Well from Plume Boundary ³ (feet)	Distance of Nearest Surface Water Body from Plume Boundary ⁴ (feet)	Stable or Decreasing Plume ⁵	Maximum Dissolved Benzene Concentration ⁶ (µg/L)	Maximum Dissolved MTBE Concentration ⁶ (µg/L)	Property Owner Willing to Accept Land Use Restriction ⁷			
Site											
Does the contaminant plume that exceeds water quality objectives meet <u>all of the characteristics</u> of at least <u>one of the five LTCP classes</u> listed below?									<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
1 ^a	< 100	No	>250	>250	Yes	NA	NA	NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
2 ^b	<250	No	>1,000	>1,000	Yes	<3,000	<1,000	NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
3 ^c	<250	Yes	>1,000	>1,000	> 5 Years	NA	NA	Yes	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
4 ^d	<1,000	No	>1,000	>1,000	Yes	<1,000	<1,000	NA	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
5 ^e	A site-specific analysis determines that under current and reasonable anticipated near-term future scenarios, the contaminant plume poses a low threat to human health and safety and to the environment and water quality objectives will be achieved within a reasonable period time frame.								<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE

Notes:

1 = The length of the plume is the maximum extent from the point of release of any petroleum related constituent in groundwater that exceeds the WQOs. The plume boundary is where the constituent(s) furthest from the point of release concentration level equals the WQOs (Technical Justification for Groundwater Specific Criteria). **General Criteria – Conceptual Site Model pages e-___ through e-___ to support plume length determination.**

2 = A “Yes” designation signifies free product remains at the site, has been removed to the maximum extent practicable, but does not extend off-site. A “No” designation means free product does not exist onsite or off-site. **See General Criteria – Conceptual Site Model pages e-___ through e-___ to support free product status.**

(See page gw-4 for a continuation of notes)

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

LTCP Groundwater Contaminant Plume Classification Characteristics

Notes (continued):

- 3 = **See General Criteria – Conceptual Site Model sheets** to support distance to nearest water supply well.
- 4 = **See General Criteria – Conceptual Site Model sheets** to support distance to nearest surface water body.
- 5 = The specified concentrations are maximums, and typically occur in source area monitoring wells. **See General Criteria – Conceptual Site Model sheets** to support length of time plume has been stable or decreasing.
- 6 = The specified concentrations are maximums, and typically occur in source area monitoring wells. **See General Criteria – Conceptual Site Model sheets** to support dissolved benzene and MTBE concentrations.
- 7 = **See General Criteria – Conceptual Site Model sheets** to support Property Owner's willingness to accept Land Use Restrictions.
- a = Class 1: Represents a short, stabilized plume that is indicative of a small or depleted source and/or very high natural attenuation rate. (CA LUFT Manual)
- b = Class 2: Represents a moderate, stabilized plume length (plume boundary is <250 feet from point of release) that approximates the average benzene plume length from cited studies. The maximum concentration of benzene (3,000 µg/L) and MTBE (1,000 µg/L) in groundwater are conservative indicators that free product is not present. These concentrations are approximately 10% and 0.02%, respectively, of the typical effective solubility of benzene and MTBE in unweathered gasoline. (CA LUFT Manual)
- c = Class 3: Represents a moderate, stabilized plume length (plume boundary is <250 feet from point of release) that approximates the average benzene plume length from cited studies. The on-site free product and/or high dissolved concentrations in the plume remaining after secondary source removal to the maximum extent practicable as per the General Criteria in the Policy require that the plume has been stable or decreasing for a minimum of five years of monitoring to validate plume stability/natural attenuation (i.e., to confirm that the rate of natural attenuation exceeds the rate of LNAPL dissolution and dissolved-phase migration). (CA LUFT Manual)
- d = Class 4: Represents a long, stabilized plume length (plume boundary is <1,000 feet from point of release) that approximates the maximum MTBE plume length cited. (CA LUFT Manual)
- e = Class 5: For other low-threat site-specific scenarios not captured in Class 1 through 4, use a fate-and-transport model to evaluate the potential migration and attenuation of the chemicals using site-specific calibration data when available. It is important to use models that consider mass balance whenever possible. (CA LUFT Manual)
- NA = Not applicable

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: GROUNDWATER**

Groundwater: Case Notes

Case File References (Document File Names):

Technical References:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

Does the site qualify for the active commercial fueling facility exemption? -OR-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE
Does the site meet <u>one of the three</u> petroleum vapor intrusion to indoor air specific criteria (a, b, or c)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE

LTCP Statement: “Exposure to petroleum vapors migrating from soil or groundwater to indoor air may pose unacceptable human health risks. This policy describes conditions, including bioattenuation zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks. In many petroleum release cases, potential human exposures to vapors are mitigated by bioattenuation processes as vapors migrate toward the ground surface. For the purposes of this section, the term “bioattenuation zone” means an area of soil with conditions that support biodegradation of petroleum hydrocarbon vapors.

The low-threat vapor-intrusion criteria described below apply to sites where the release originated and impacted or potentially impacted adjacent parcels when:

- (1) existing buildings are occupied or may be reasonably expected to be occupied in the future, or
- (2) buildings for human occupancy are reasonably expected to be constructed in the future.

Appendices 1 through 4 (attached) illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario. Petroleum release sites shall satisfy the media-specific criteria for petroleum vapor intrusion to indoor air and be considered low-threat for the vapor-intrusion-to-indoor-air pathway if:

- a. Site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, or all of the characteristics and criteria of scenario 4 as applicable; or
- b. A site-specific risk assessment for the vapor intrusion pathway is conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency; or
- c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health.

Exception: Exposures to petroleum vapors associated with historical fuel system releases are comparatively insignificant relative to exposures from small surface spills and fugitive vapor releases that typically occur at active fueling facilities. Therefore, satisfaction of the media-specific criteria for petroleum vapor intrusion to indoor air is not required at active commercial petroleum fueling facilities, except in cases where release characteristics can be reasonably believed to pose an unacceptable health risk.”

Does the site qualify for an <u>exemption</u> from the Petroleum Vapor Intrusion to Indoor Air criteria?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the site is an active commercial petroleum fueling facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are release characteristics reasonably believed to pose an unacceptable health risk to facility users or nearby facilities?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
If the site <u>does not</u> qualify for an exemption, then				
a. Do site-specific conditions at the release site satisfy all of the characteristics and criteria of scenarios 1 through 3 as applicable, <u>or</u> all of the characteristics and criteria of scenario 4? -OR- <i>(Use page vi-2 through vi-10 to support answer)</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted that demonstrates that human health is protected? -OR-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
c. As a result of controlling exposure through the use of mitigation measures <u>or</u> through the use of institutional or engineering controls, has the regulatory agency determined that petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use General Criteria e - Conceptual Site Model pages to support answer

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

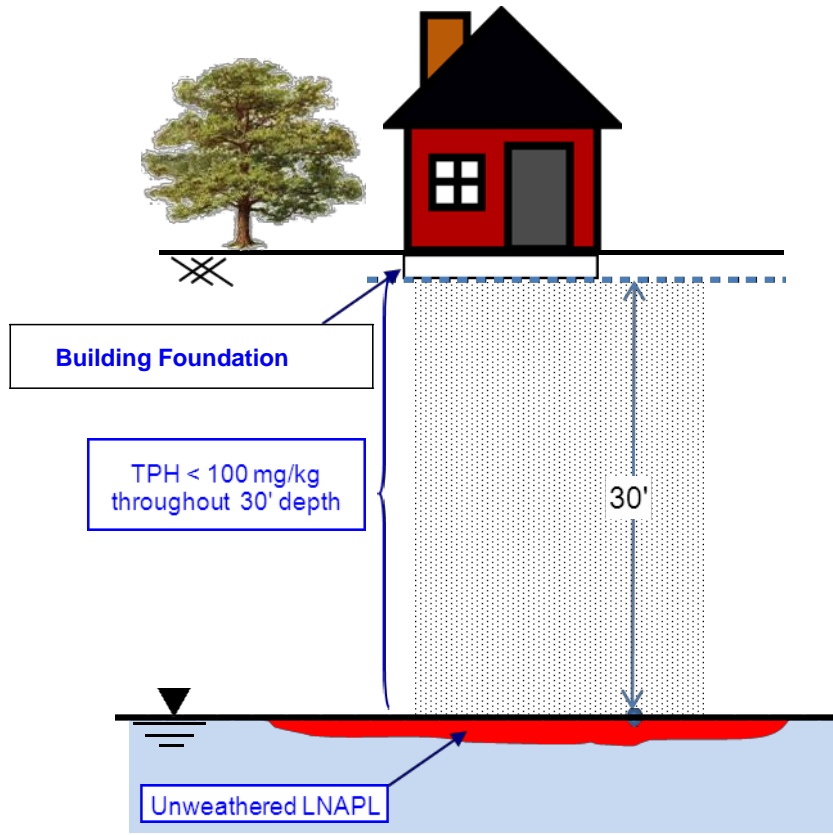
SCENARIO 1 - UNWEATHERED LNAPL IN GROUNDWATER

Do site specific conditions at the site satisfy all the characteristics of Scenario 1?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Scenario 1
Existing Building or Potential Future Construction**

LNAPL Characteristics:
Unweathered – petroleum product that has not been subjected to significant volatilization or solubilization, and therefore has not lost a significant portion of its volatile or soluble constituents (e.g., comparable to recently dispensed fuel)

Bioattenuation Zone Required Characteristics:
Minimum 30 foot vertical separation distance between the bottom of building foundations and LNAPL in groundwater,
Total TPH concentrations in soil < 100 mg/kg



Is the LNAPL unweathered?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet vertically</u> between the LNAPL in groundwater and the foundation of existing buildings?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet vertically</u> between the LNAPL in groundwater and the foundation of potential buildings?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are total TPH concentrations in soil less than 100 mg/kg throughout the entire vertical extent of the 30 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

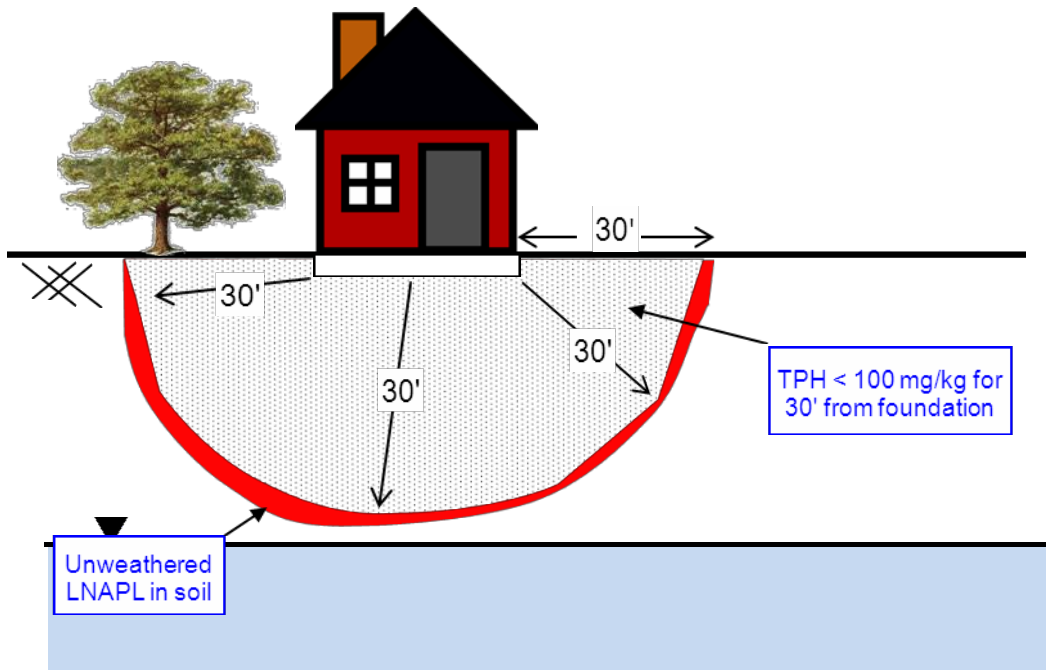
SCENARIO 2 - UNWEATHERED LNAPL IN SOIL

Do site specific conditions at the site satisfy all the characteristics of Scenario 2?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Scenario 2
Existing Building or Potential Future Construction**

LNAPL Characteristics:
Unweathered – petroleum product that has not been subjected to significant volatilization or solubilization, and therefore has not lost a significant portion of its volatile or soluble constituents (e.g., comparable to recently dispensed fuel)

Bioattenuation Zone Required Characteristics:
Minimum 30 foot vertical separation distance between the bottom of building foundations and LNAPL in soil,
Total TPH concentrations in Soil < 100 mg/kg



Is the LNAPL unweathered?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet both laterally and vertically</u> between the LNAPL in soil and the foundation of existing buildings?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Does the site have a continuous bioattenuation zone that provides a separation of <u>at least 30 feet both laterally and vertically</u> between the LNAPL in soil and the foundation of <u>potential buildings</u> ?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are total TPH concentrations in soil less than 100 mg/kg throughout the entire lateral and vertical extent of the 30 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

SCENARIO 3 – LOW CONCENTRATION GROUNDWATER SCENARIO (FIGURE A)

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 3 Figure A?

Y

N

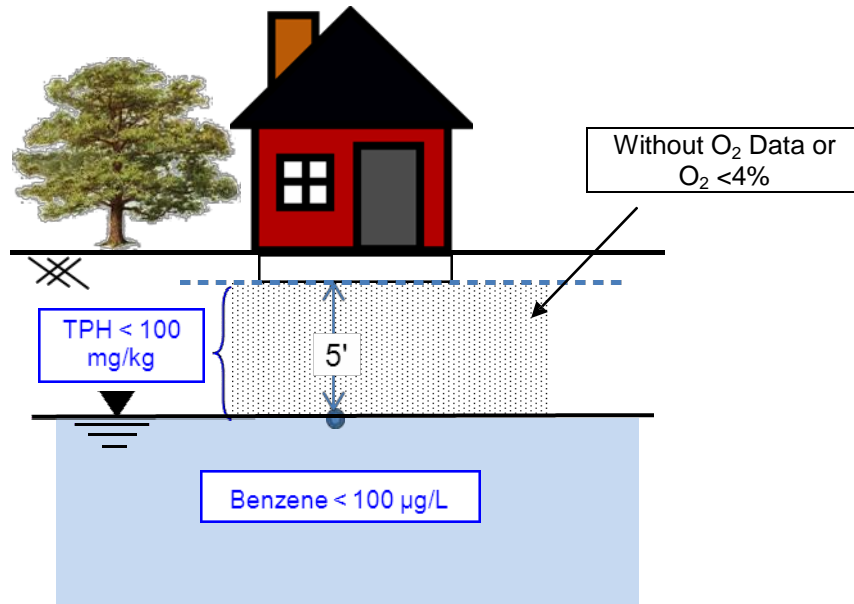
NE

NA

**Figure A
Existing Building or Future Construction**

Dissolved Phase Benzene Concentrations in Groundwater Requirements:
 $< 100 \mu\text{g/L}$

Bioattenuation Zone Required Characteristics:
 Minimum 5 Foot Vertical Separation Distance between Bottom of Building Foundations and Water Table,
 No Soil Gas Oxygen Data or Measured Soil Gas Oxygen Concentrations $< 4\%$,
 Total TPH Concentrations in Soil $< 100 \text{ mg/kg}$



Are maximum dissolved benzene concentrations in groundwater $< 100 \mu\text{g/L}$? -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 5 feet vertically</u> between the dissolved phase benzene and the foundation of existing buildings? -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 5 feet vertically</u> between the dissolved phase benzene and the foundation of potential buildings? -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that Total TPH (TPH-g and TPH-d combined) concentrations in soil are $< 100 \text{ mg/kg}$ <u>throughout the entire depth</u> of the 5 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

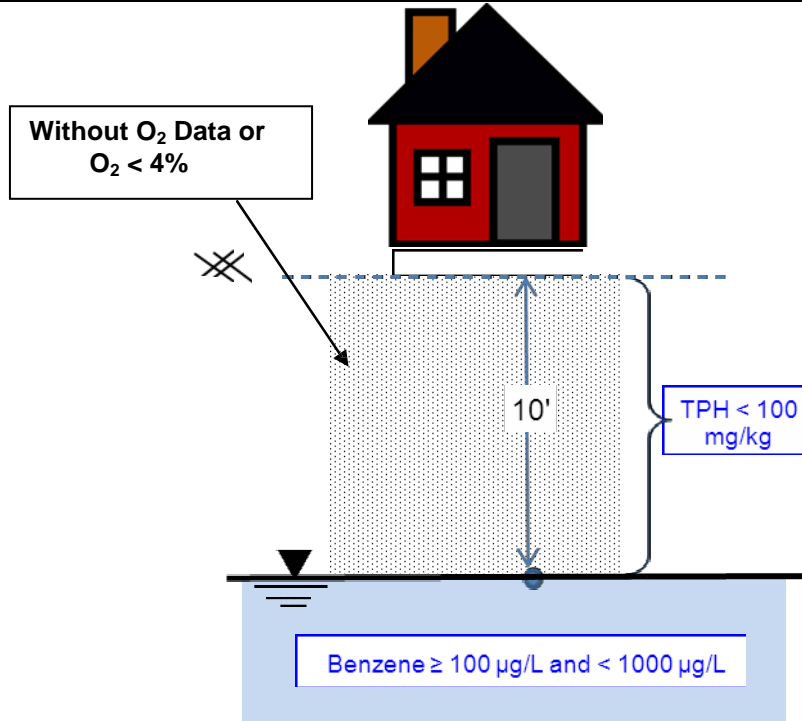
SCENARIO 3 – LOW CONCENTRATION GROUNDWATER SCENARIO (FIGURE B)

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 3 - Figure B?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Figure B
Existing Building or Future Construction**

Dissolved Phase Benzene Concentrations in Groundwater Requirements:
≥ 100 µg/L but < 1,000 µg/L

Bioattenuation Zone Required Characteristics:
Minimum 5 Foot Vertical Separation Distance between Bottom of Building Foundations and Water Table,
Measured Soil Gas Oxygen Concentrations < 4%,
Total TPH Concentrations in Soil < 100 mg/kg



Are maximum dissolved benzene concentrations in groundwater ≥ 100 µg/L but < 1,000 µg/L?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of existing buildings ?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of potential buildings ?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that Total TPH (TPH-g and TPH-d combined) concentrations in soil are < 100 mg/kg <u>throughout the entire depth</u> of the 10 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

SCENARIO 3 – LOW CONCENTRATION GROUNDWATER SCENARIO (FIGURE C)

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 3 - Figure C?

 Y

 N

 NE

 NA

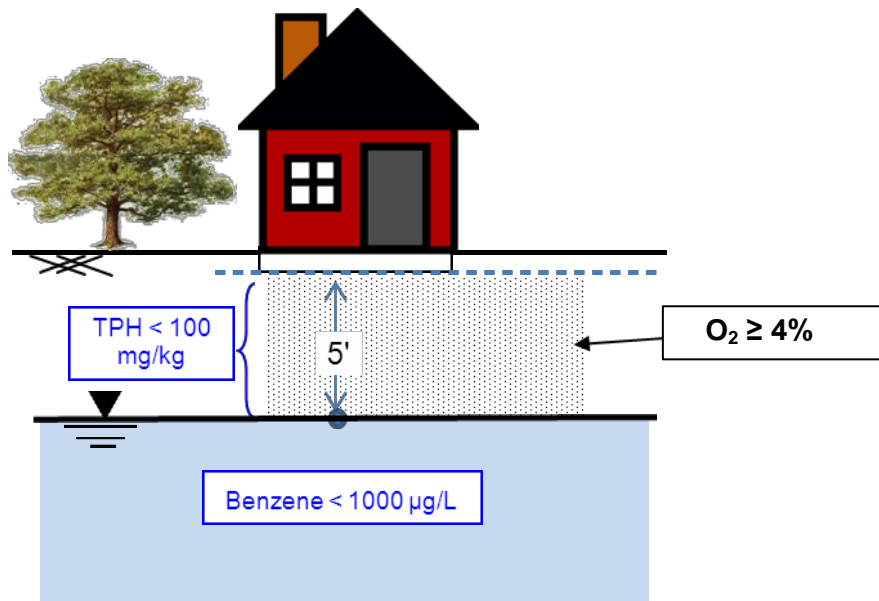
**Figure C
Existing Building or Future Construction**

Dissolved Phase Benzene Concentrations in Groundwater Requirements:

< 1,000 µg/L

Bioattenuation Zone Required Characteristics:

Minimum 5 Foot Vertical Separation Distance between Bottom of Building Foundations and Water Table,
Measured Soil Gas Oxygen Concentrations ≥ 4%,
Total TPH Concentrations in Soil < 100 mg/kg



Are maximum dissolved benzene concentrations in groundwater ≥ 100 µg/L but < 1,000 µg/L?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of <u>existing buildings</u> ?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the bioattenuation zone a continuous zone that provides a separation of <u>at least 10 feet vertically</u> between the dissolved phase benzene and the foundation of <u>potential buildings</u> ?; -and-	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that Total TPH (TPH-g and TPH-d combined) concentrations in soil are < 100 mg/kg <u>throughout the entire depth</u> of the 10 foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS
(WITH A BIOATTENUATION ZONE)**

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 4 – With Bioattenuation Zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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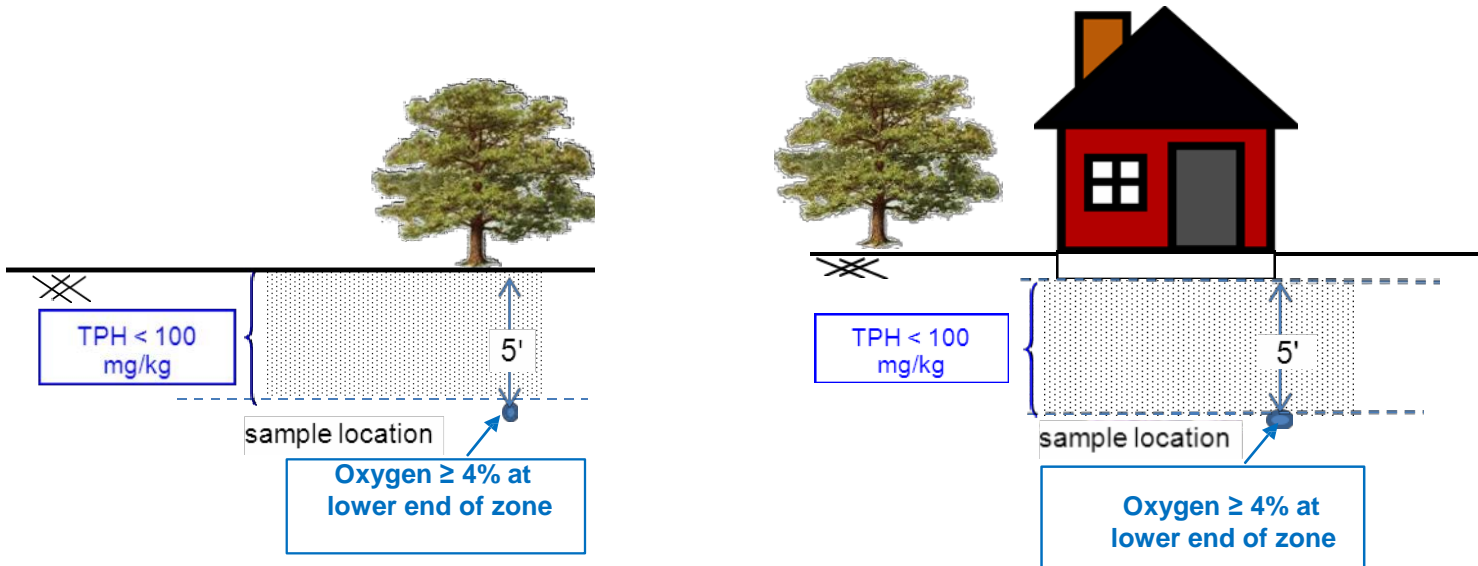
**Soil Gas Sampling – With Bioattenuation Zone
Existing Building or Future Construction**

Bioattenuation Zone Required Characteristics:
 Minimum 5 foot vertical feet of soil between the soil vapor measurement and the foundation of an existing building or ground surface of future construction;
 Total TPH concentrations in soil < 100 mg/kg (measured in at least two depths within the five-foot zone);
 Soil gas oxygen concentrations ≥ 4% at the bottom of the five-foot bioattenuation zone

Soil Gas Sample Location Requirements:
 Existing Buildings - At least five feet below the bottom of the building foundation
 Future Construction - The soil gas sample shall be collected from at least five feet below ground surface

Existing Building

Future Construction



Are the required bioattenuation zone characteristics satisfied?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there a minimum 5 foot vertical feet of soil between the soil vapor measurement and the foundation of <u>existing buildings</u> ?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is there a minimum 5 foot vertical feet of soil between the soil vapor measurement and the <u>ground surface of future construction</u> ?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that total TPH concentrations in soil are < 100 mg/kg (measured in at least two depths within the five-foot zone)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that soil gas oxygen concentrations are ≥ 4% at the bottom of the five-foot bioattenuation zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS (WITH A BIOATTENUATION ZONE)

If the required bioattenuation zone characteristics have been met then,

Have soil gas samples been collected in accordance with required protocols?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For existing buildings, were soil gas samples collected from at least five feet below the bottom of building foundations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For sites where future construction is planned, were soil gas samples collected from at least five feet below ground surface within the footprints of future buildings?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Were samples collected in accordance with the guidance provided in the CA LUFT Manual?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified <u>residential screening levels</u>?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 85,000 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 1,100,000 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 93,000 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified <u>commercial screening levels</u>?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 280,000 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 3,600,000 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 310,000 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

If the required bioattenuation zone characteristics have not been satisfied then use Scenario 4 – No Bioattenuation Zone (pages vi-9 and vi-10)

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

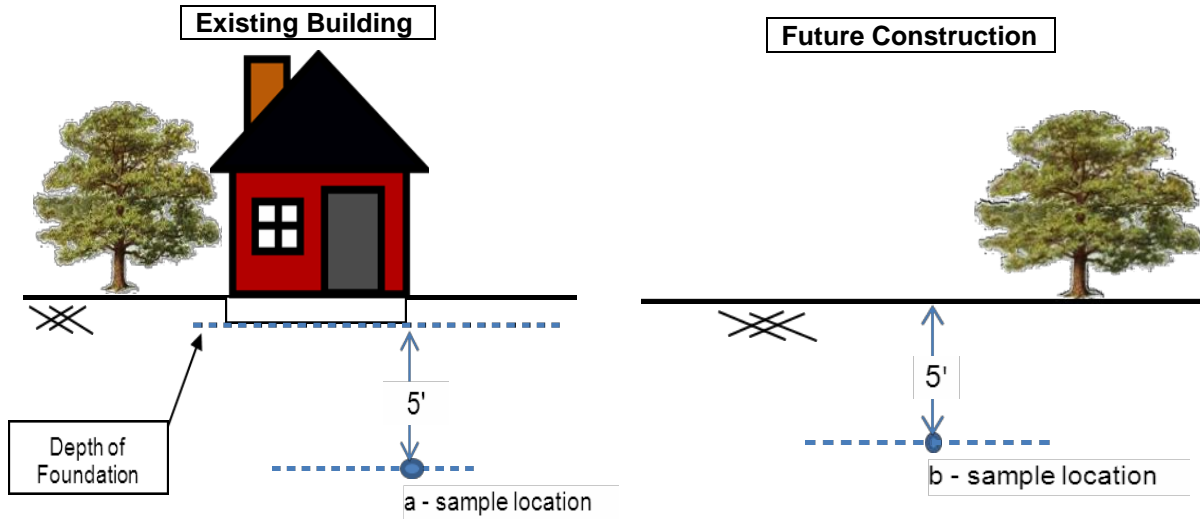
**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS
(NO BIOATTENUATION ZONE)**

Does the Site Satisfy all of the Characteristics and Requirements of Scenario 4 – No Bioattenuation Zone?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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**Soil Gas Sampling – No Bioattenuation Zone
Existing Building or Future Construction**

Soil Gas Sample Location Requirements:

Existing Buildings – At least five feet below the bottom of the building foundation
 Future Construction - The soil gas sample shall be collected from at least five feet below ground surface



Were appropriate protocols followed for collecting soil gas samples?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For existing buildings, were soil gas samples collected from at least five feet below the bottom of building foundations?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
For sites where future construction is planned, were soil gas samples collected from at least five feet below ground surface within the footprints of future buildings?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Were samples collected in accordance with the guidance provided in the CA LUFT Manual?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified residential screening levels?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 85 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 1,100 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 93 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that soil gas concentrations for benzene, ethylbenzene, and naphthalene are below the specified commercial screening levels?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 280 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene < 3,600 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 310 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

**SCENARIO 4 – DIRECT MEASUREMENT OF SOIL GAS CONCENTRATIONS
(NO BIOATTENUATION ZONE)**

For the no bioattenuation zone scenario, the screening criteria provided in the table on the preceding page are the same as the California Human Health Screening Levels (CHSSLs) with engineered fill below sub-slab.

If building crawl space air samples were collected instead of soil gas samples to evaluate vapor intrusion into buildings, then

Were appropriate protocols followed for collecting the crawl space air samples?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Were samples collected in accordance with the guidance provided in <i>the CA LUFT Manual</i> and referenced documents including the DTSC's <i>Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air</i> ?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that crawl space air concentrations for benzene, ethylbenzene, and naphthalene are below the appropriate residential screening levels (i.e., CHHSLs for Indoor Air)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 0.084 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene – No screening number currently available	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 0.072 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been collected to determine that crawl space air concentrations for benzene, ethylbenzene, and naphthalene are below the appropriate commercial screening levels (i.e., CHHSLs for Indoor Air)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Benzene < 0.141 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Ethylbenzene – No screening number currently available	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Napthalene < 0.120 µg/m ³	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use Criteria e – Conceptual Site Model sheets to support answers

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

Case Notes

Case File Document References:

Technical References:

Case Notes:

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: PETROLEUM VAPOR INTRUSION TO INDOOR AIR**

Case Notes

Case Notes (continued):

Key: ■ NE = Identified Data Gap - Needs Further Evaluation ■ NA = Not Applicable

**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: DIRECT CONTACT AND OUTDOOR AIR EXPOSURE**

Does the site qualify for an <u>exemption</u> from the media-specific criteria for Direct Contact and Outdoor Air Exposure? -OR-	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NE
Does the site meet the media-specific criteria for Direct Contact and Outdoor Air Exposure?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NE

LTCP Statement: “This policy describes conditions where direct contact with contaminated soil or inhalation of contaminants volatilized to outdoor air poses a low threat to human health. Release sites where human exposure may occur satisfy the media-specific criteria for direct contact and outdoor air exposure and shall be considered low-threat if they meet any of the following:

- a. Maximum concentrations of petroleum constituents in soil are less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs). The concentration limits for 0 to 5 feet bgs protect from ingestion of soil, dermal contact with soil, and inhalation of volatile soil emissions and inhalation of particulate emissions. The 5 to 10 feet bgs concentration limits protect from inhalation of volatile soil emissions. Both the 0 to 5 feet bgs concentration limits and the 5 to 10 feet bgs concentration limits for the appropriate site classification (Residential or Commercial/Industrial) shall be satisfied. In addition, if exposure to construction workers or utility trench workers is reasonably anticipated, the concentration limits for Utility Worker shall also be satisfied; or
- b. Maximum concentration of petroleum constituents in soil are less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health; or
- c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, the regulatory agency determines that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health.”

Has adequate data been collected to demonstrate that the upper 10 feet of soil is free of petroleum contamination and therefore qualifies for the exemption?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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If the site does not qualify for the exemption, then does the site satisfy the media-specific criteria (a, b, <u>or</u> c) for direct contact and outdoor air exposure?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
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a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth bgs? <i>Use page dc-2 to support answer</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
b. Are the maximum concentrations of petroleum constituents in soil less than levels that a site specific risk assessment demonstrates will have no significant risk of adversely affecting human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
c. As a result of controlling exposure through the use of mitigation measures or through the use of institutional or engineering controls, has the regulatory agency determined that the concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

Use General Criteria e – Conceptual Site Model sheets to support your answers

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**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: DIRECT CONTACT AND OUTDOOR AIR EXPOSURE**

Maximum Concentrations of Petroleum Constituents in Soil (Scenario a)

**Table 1 – Concentrations of Petroleum Constituents in Soil
That will Have No Significant Risk of Adversely Affecting Human Health**

Chemical	Residential		Commercial/Industrial		Utility Worker
	0 to 5 ft bgs (mg/kg)	5 to 10 ft bgs (mg/kg)	0 to 5 ft bgs (mg/kg)	5 to 10 ft bgs (mg/kg)	0 to 10 ft bgs (mg/kg)
Benzene	1.9	2.8	8.2	12	14
<i>Max Soil Conc¹</i>					
Ethylbenzene	21	32	89	134	314
<i>Max Soil Conc¹</i>					
Napthalene	9.7	9.7	45	45	219
<i>Max Soil Conc¹</i>					
PAH²	0.063	NA	0.68	NA	4.5
<i>Max Soil Conc¹</i>					

Notes:

1. The maximum concentrations of petroleum constituents in soil should be compared to those listed in Table 1 (Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways, SWRCB)
2. Based on the seven carcinogenic poly-aromatic hydrocarbons (PAHs) as benzo(a)pyrene toxicity equivalent [BaPe]. Sampling and analysis for PAHs is only necessary where soil is affected by either waste oil or Bunker C oil.

Are all the concentration limits for <u>all</u> the appropriate site classification satisfied?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Residential: 0 to 5 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Residential: 5 to 10 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Commercial/Industrial: 0 to 5 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Commercial/Industrial: 5 to 10 feet bgs	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Utility Worker: 0 to 10 feet bgs?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have the requirements for using the screening levels in Table 1 been satisfied (i.e., have the model assumptions presented in the SWRCB document entitled “Technical Justification for Soil Screening Levels for Direct Contact and Outdoor Air Exposure Pathways” been met?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the area of impacted soil where a particular exposure occurs ≤ 82 feet by 82 feet?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the receptor located at the downgradient edge for inhalation exposure?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Is the wind speed < 2.25 meters per second (7.38 feet per second) on average?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are there different exposure scenarios than residential, commercial/industrial, utility worker) at the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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**LOW THREAT CLOSURE POLICY
MEDIA SPECIFIC CRITERIA: DIRECT CONTACT AND OUTDOOR AIR EXPOSURE**

Direct Contact and Outdoor Air Exposure: Case Notes

Case File Reference Documents:

Technical References:

Case Notes:

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ACEH Supplementary Forms

**CONCEPTUAL SITE MODEL
AND DATA GAP IDENTIFICATION CHECKLIST**

Well Survey

Are there existing water supply wells or other sources of water in the vicinity of the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a recent well survey been conducted to identify all wells within 2,000 feet of the site? Name, author, and date of survey document: <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have Department of Water Resources records been reviewed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have Zone 7 Water Agency records been reviewed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have Alameda County Public Works records been reviewed?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a background study of the historical land uses of the site and properties in the vicinity of the site been conducted to determine the existence of unrecorded/unknown (abandoned) wells?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has sufficient data been provided on all wells located within 2,000 feet of the site to identify sensitive receptors and determine potential contaminant migration pathways to and from the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a figure (with rose diagram) identifying each well location been presented?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have DWR well logs (marked as confidential) been provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a table with details of the well search been provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Identification number (ID) corresponding to the well location on a figure?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
State Well ID, Well Owner ID?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well location address?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Distance of well from the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Direction of well from the site (downgradient, upgradient, crossgradient)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Type of well (monitoring, remediation, irrigation, water supply, industrial, livestock, dewatering, cathodic protection)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well status (active, inactive, decommissioned, unrecorded, and/or abandoned)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well installation date?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well decommissioned date?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Total Well depth (feet bgs)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well screen interval (feet bgs)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well seal interval (feet bgs)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Well diameter (inches)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Are these supply wells or other sources of water used by property owners/tenants in the vicinity of the site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Has a neighborhood backyard domestic water/irrigation well assessment been conducted?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have wells been impacted by the release site?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have the wells been sampled for chemicals of concern associated with the release site and analytical results been provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA
Have impacted wells been decommissioned and well destruction records provided?	<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> NE	<input type="checkbox"/> NA

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