

ENVIRONMENTAL
SERVICES
95 SEP -6 PM 3:18

August 31, 1995

Mark A. Miller
Chevron USA Products Company
P.O. Box 5004
San Ramon, California 94583

Re: Ground Water Data Discrepancies
Former Chevron S.S. #9-5630
997 Grant Avenue
San Lorenzo, California

Dear Mr. Miller:

Sierra Environmental Services (SES) provides this response to your letter of August 24, 1995.¹ In that letter, you inquired about discrepancies between data reported by SES and that contained in the Chevron files for the site.

Upon receipt of your letter, SES initiated an internal review of the matter. This included review of: all SES project files (including *original*, signed laboratory reports); SES's chronological files of reports issued; and computer data archives from 1991 (when SES began work at the site) to the present. SES has original, signed copies of all laboratory reports in the file for the site. The assertion that two different sets of *original* laboratory analytical data exist was not confirmed by our file review.

The original, signed laboratory reports in the SES files were checked against all reports submitted to Chevron by SES and were consistent with both the data in the tables and the laboratory data attached to each report. We also reviewed the tables in our computer database and they are consistent with the tables and original laboratory reports which are present in our file copies of all of the site reports.

¹ Chevron, 1995, Letter to Chris Bramer, Sierra Environmental Services, from Mark A. Miller, Site Assessment and Remediation Engineer, Chevron USA, August 24, 1995, 2 pages and 3 attachments.



Mark Miller
August 31, 1995
SES Project #1-206-04

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We then compared the laboratory reports provided by Chevron with the laboratory reports attached to the SES quarterly reports. The laboratory reports provided by Chevron have apparently been altered.

In addition, we have also identified a misalignment on the table provided by Chevron² which does not correlate to the table in our files (Appendix A). We have also attached copies of the laboratory reports which illustrate the misalignment of selected portions of the laboratory data supplied by Chevron (Appendix B).

Around March 1995, Chevron requested that SES provide copies of all analytic tables generated for Chevron routine sampling projects on computer disk. SES transferred this information to Chevron, as requested. This data was transferred on disk as a courtesy to Chevron; however, we are not responsible for the integrity of the data after it arrived in the Chevron offices.

Clearly, SES and Superior Precision Analytical, Inc. (SPA) do not have anything to gain by misreporting, falsifying or altering data for any site or this site in particular. SES and SPA have provided services for hundreds of Chevron sites throughout California and Colorado and no other incidents such as this have occurred.

Based on the review of our files and the information provided in your letter to Alameda County regarding your contact with SPA, we can only conclude that the apparent alteration of the laboratory data occurred after SES submitted the quarterly reports to Chevron.

² Chevron's version of SES's Table 2 from an October 13, 1993 Quarterly Groundwater Monitoring Report, sent by facsimile to Chris Bramer, SES, by Mark Miller, Chevron USA on April 26, 1995, 8 pages.

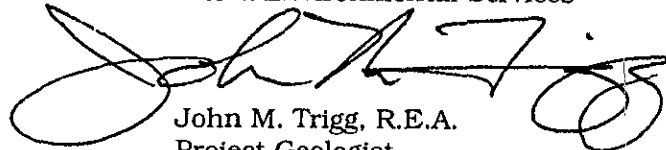


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As required by the SES contract with Chevron, copies of our files are accessible at your request. Please call me if you have any questions or require additional information.

Sincerely,
Sierra Environmental Services



John M. Trigg, R.E.A.
Project Geologist

JMT/lmo
20604L1.AG5

Attachments: Appendix A - Table Comparison
Appendix B - Laboratory Report Comparison

cc: Ms. Juliet Shin - ACHCSA
Ms. Bette Owen - Chevron USA
Mr. Curtis Peck - CRTC
Mr. John Randall - Chevron USA
Mr. Alan Cox - Jordan, Keeler and Seligman
Mr. Lawrence E. Cogan - Ware & Freidenrich
Mr. Michael Meniktas - Meniktas & Associates
Ms. Sharon Halper - Principal, SES



APPENDIX A
TABLE COMPARISON

A page from Table 2., SES Quarterly Groundwater Monitoring Report,
 October 13, 1993. From SES Files.



Table 2. Analytic Results for Ground Water - Former Chevron Service Station #9-5630, 997 Grant Avenue, San Lorenzo, California

Well ID	Date Sampled	Analytic Lab	Analytic Method	-----ppb-----					
				TPPH(G)	B	T	E	X	O&G
C-1	12/5/90	SAL	8015/8020/503E	<50	<0.5	<0.5	<0.5	<0.5	<5,000
	9/6/91	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	12/4/91	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	4/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	6/3/92	SPA	8015/8020	<50	1.4	1.5	0.6	3.0	<5,000
	9/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	12/1/92	SPA	8015/8020	<50	0.6	3.5	0.7	3.4	---
	3/23/93	SPA	8015/8020	200	13	8.7	<0.5	10	---
	6/15/93	SPA	8015/8020	74	1.4	5.2	1.6	11	---
	9/7/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---
C-2	12/5/90	SAL	8015/8020	<50	0.7	<0.5	<0.5	0.5	---
	9/6/91	SPA	8015/8020	<50	1.3	0.6	0.7	1.5	---
	12/4/91 ²	---	---	---	---	---	---	---	---
	4/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	6/3/92	SPA	8015/8020	180	12	13	7.9	21	---
	9/2/92	SPA	8015/8020	630	14	30	18	54	---
	12/1/92	SPA	8015/8020	1,000	47	83	51	150	---
	3/23/93	SPA	8015/8020	80	5.0	7.9	6.0	18	---
	6/15/93	SPA	8015/8020	220	9.0	16	12	37	---
	9/7/93	SPA	8025/8020	200	13	21	15	43	---
C-3	12/5/90	SAL	8015/8020	<50	1	0.7	<0.5	<0.5	---
	9/6/91	SPA	8015/8020	1,100	150	0.6	51	1.9	---
	12/4/91	SPA	8015/8020	89	<0.5	<0.5	0.7	0.6	---
	4/2/92	SPA	8015/8020	60	2.1	1.3	1.1	3.2	---
	6/3/92	SPA	8015/8020	7,600	94	86	26	89	---
	9/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	0.9	---
	12/1/92	SPA	8015/8020	54	0.8	5.7	1.1	5.9	---
	3/23/93	SPA	8015/8020	<50	1.1	1.4	<0.5	1.7	---
	6/15/93	SPA	8015/8020	67	1.3	3.9	1.1	7.8	---
	9/7/93 ⁴	---	---	---	---	---	---	---	---
C-4	12/5/90	SAL	8015/8020	<50	4	2	0.7	3	---
	9/6/91 ¹	---	---	---	---	---	---	---	---
C-5	2/16/93 ³	---	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	3/23/93	SPA	8015/8020	<50	<1.5	0.9	<0.5	<1.5	---
	6/15/93	SPA	8015/8020	70	0.7	1.7	<0.5	2.8	---
	9/7/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---

A page from Table 2., SES Quarterly Groundwater Monitoring Report, October 13, 1993. From Chevron Files.



Table 2. Analytic Results for Ground Water - Former Chevron Service Station #9-5630, 997 Grant Avenue, San Lorenzo, California

Well ID	Date Sampled	Analytic Lab	Analytic Method	TPPH(G) B T E X O&G					
				----->					
C-1	12/5/90	SAL	8016/8020/503E	<50	<0.5	<0.5	<0.5	<0.5	<5,000
	9/6/91	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	12/4/91	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	4/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	<5,000
	6/3/92	SPA	8015/8020	<50	1.4	1.5	0.6	3.0	---
	9/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	12/1/92	SPA	8015/8020	<50	0.8	3.5	0.7	3.4	---
	3/23/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	6/15/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---
9/7/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---	
C-2	12/5/90	SAL	8015/8020	<50	0.7	<0.5	<0.5	0.5	---
	9/6/91	SPA	8015/8020	<50	1.3	0.6	0.7	1.5	---
	12/4/91 ²	---	---	---	---	---	---	---	---
	4/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	6/3/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	9/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	12/1/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	3/23/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---
	6/15/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---
9/7/93	SPA	8025/8020	<50	<0.5	<0.5	<0.5	<1.5	---	
C-3	12/5/90	SAL	8015/8020	<50	1	0.7	<0.5	<0.5	---
	9/6/91	SPA	8015/8020	1,100	150	0.6	51	1.9	---
	12/4/91	SPA	8015/8020	89	<0.5	<0.5	0.7	0.6	---
	4/2/92	SPA	8015/8020	60	2.1	1.3	1.1	3.2	---
	6/3/92	SPA	8015/8020	180	3.0	1.4	0.6	1.5	---
	9/2/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	0.9	---
	12/1/92	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	3/23/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	6/15/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---
9/7/93 ⁴	---	---	---	---	---	---	---	---	
C-4	12/5/90	SAL	8015/8020	<50	4	2	0.7	3	---
	9/6/91 ¹	---	---	---	---	---	---	---	---
C-5	2/16/93 ³	---	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	3/23/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<0.5	---
	6/15/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---
	9/7/93	SPA	8015/8020	<50	<0.5	<0.5	<0.5	<1.5	---

08/07/93
 042 0202
 CHEVRON FACDC13
 SIERRA-MONTREAL
 006/003



APPENDIX B
LABORATORY REPORT COMPARISON



Superior Precision Analytical, Inc.

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

Sierra Environmental
Attn: ARGY MENA

Project 1-206-04
Reported 09/10/93

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed Matrix
89892- 1	TB-LB	09/07/93	09/08/93 Water
89892- 2	BB	09/07/93	09/08/93 Water
89892- 3	C-1	09/07/93	09/08/93 Water
89892- 4	C-5	09/07/93	09/08/93 Water
89892- 5	C-2	09/07/93	09/08/93 Water

RESULTS OF ANALYSIS

Laboratory Number: 89892- 1 89892- 2 89892- 3 89892- 4

Gasoline:	ND<50	ND<50	ND<50	ND<50
Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Toluene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Total Xylenes:	ND<1.5	ND<1.5	ND<1.5	ND<1.5
Concentration:	ug/L	ug/L	ug/L	ug/L

Laboratory Number: 89892- 5

Gasoline:	200	✓
Benzene:	13	✓
Toluene:	21	✓
Ethyl Benzene:	15	✓
Total Xylenes:	43	✓
Concentration:	ug/L	



Superior Precision Analytical, Inc.

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Sierra Environmental
Attn: ARGY MENA

Project: 1-206-04
Reported: 03/30/93

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed Matrix
88133- 1	TB-LB	03/23/93	03/27/93 Water
88133- 2	BB	03/23/93	03/25/93 Water
88133- 3	C-1	03/23/93	03/31/93 Water
88133- 4	C-3	03/23/93	03/26/93 Water
88133- 5	C-2	03/23/93	03/25/93 Water
88133- 6	C-5	03/23/93	03/26/93 Water

RESULTS OF ANALYSIS

Laboratory Number: 88133- 1 88133- 2 88133- 3 88133- 4 88133- 5

Gasoline:	ND<50	ND<50	200 ✓	ND<50	80 ✓
Benzene:	ND<0.5	ND<0.5	13 ✓	1.1	5.0 ✓
Toluene:	ND<0.5	ND<0.5	8.7 ✓	1.4	7.9 ✓
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5 ✓	ND<0.5	6.0 ✓
Xylenes:	ND<1.5	ND<1.5	10 ✓	1.7	18 ✓
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L

Laboratory Number: 88133- 6

Gasoline:	ND<50 ✓
Benzene:	1.5 ✓
Toluene:	0.9 ✓
Ethyl Benzene:	ND<0.5 ✓
Xylenes:	ND<1.5 ✓

Concentration: ug/L



Superior Precision Analytical, Inc.

P.O. Box 1545 • Martinez, California 94553 • (510) 229-1590 / fax (510) 229-0916

Sierra Environmental
Attn: Chris Bramer

Project 1-206-04
Reported 12/09/92

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed	Matrix
87323- 1	TB-LB	12/01/92	12/08/92	Water
87323- 2	BB	12/01/92	12/08/92	Water
87323- 3	C-1	12/01/92	12/08/92	Water
87323- 4	C-2	12/01/92	12/08/92	Water
87323- 5	C-3	12/01/92	12/08/92	Water

RESULTS OF ANALYSIS

Laboratory Number: 87323- 1 87323- 2 87323- 3 87323- 4 87323- 5

Gasoline:	ND<50	ND<50	ND<50	1000 ✓	54 ✓
Benzene:	ND<0.5	ND<0.5	0.6 ✓	47 ✓	0.8 ✓
Toluene:	ND<0.5	ND<0.5	3.5 ✓	83 ✓	5.7 ✓
Ethyl Benzene:	ND<0.5	ND<0.5	0.7 ✓	51 ✓	1.1 ✓
Xylenes:	ND<0.5	ND<0.5	3.4 ✓	150 ✓	5.9 ✓
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L



Superior Precision Analytical, Inc.

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Sierra Environmental
Attn: Chris Bramer

Project 1-206-04
Reported 09/16/92

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed	Matrix
86607- 1	TB-LB	09/02/92	09/09/92	Water
86607- 2	BB	09/02/92	09/10/92	Water
86607- 3	C1	09/02/92	09/10/92	Water
86607- 4	C2	09/02/92	09/09/92	Water
86607- 5	C3	09/02/92	09/10/92	Water

RESULTS OF ANALYSIS

Laboratory Number: 86607- 1 86607- 2 86607- 3 86607- 4 86607- 5

Gasoline:	ND<50	ND<50	ND<50 ✓	630 ✓	ND<50
Benzene:	ND<0.5	ND<0.5	ND<0.5 ✓	14 ✓	ND<0.5
Toluene:	ND<0.5	ND<0.5	ND<0.5 ✓	30 ✓	ND<0.5
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5 ✓	18 ✓	ND<0.5
Xylenes:	ND<0.5	0.4	ND<0.5 ✓	54 ✓	0.9 ✓
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L



Superior Precision Analytical, Inc.

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Sierra Environmental
Attn: CHRIS CONNER

Project 1-206-04
Reported 06/10/92

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed	Matrix
85871- 1	TB-LB	06/03/92	06/05/92	Water
85871- 2	BB	06/03/92	06/05/92	Water
85871- 3	C-1	06/03/92	06/05/92	Water
85871- 4	C-2	06/03/92	06/05/92	Water
85871- 5	C-3	06/03/92	06/10/92	Water

RESULTS OF ANALYSIS

Laboratory Number:	85871- 1	85871- 2	85871- 3	85871- 4	85871- 5
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Gasoline:	ND<50	ND<50	ND<50*	180	7600
Benzene:	ND<0.5	ND<0.5	1.4	12	94
Toluene:	ND<0.5	ND<0.5	1.5	13	86
Ethyl Benzene:	ND<0.5	ND<0.5	0.6	7.9	26
Xylenes:	ND<0.5	ND<0.5	3.0	21	89
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L

FROM CHEVRON'S FILES



Superior Precision Analytical, Inc.

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Sierra Environmental
Attn: ARGY MENA

Project: 1-206-04
Reported 09/10/93

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed Matrix
89892- 1	TB-LB	09/07/93	09/08/93 Water
89892- 2	BB	09/07/93	09/08/93 Water
89892- 3	C-1	09/07/93	09/08/93 Water
89892- 4	C-5	09/07/93	09/08/93 Water
89892- 5	C-2	09/07/93	09/08/93 Water

RESULTS OF ANALYSIS

Laboratory Number: 89892- 1 89892- 2 89892- 3 89892- 4

Gasoline:	ND<50	ND<50	ND<50	ND<50
Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Toluene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Total Xylenes:	ND<1.5	ND<1.5	ND<1.5	ND<1.5
Concentration:	ug/L	ug/L	ug/L	ug/L

Laboratory Number: 89892- 5

Gasoline:	ND<50
Benzene:	ND<0.5
Toluene:	ND<0.5
Ethyl Benzene:	ND<0.5
Total Xylenes:	ND<1.5
Concentration:	ug/L



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Sierra Environmental
Attn: ARGY MENA

Project 1-206-04
Reported 03/30/93

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed	Matrix
88133- 1	TB-LB	03/23/93	03/27/93	Water
88133- 2	BB	03/23/93	03/25/93	Water
88133- 3	C-1	03/23/93	03/31/93	Water
88133- 4	C-3	03/23/93	03/26/93	Water
88133- 5	C-2	03/23/93	03/25/93	Water
88133- 6	C-5	03/23/93	03/26/93	Water

RESULTS OF ANALYSIS

Laboratory Number: 88133- 1 88133- 2 88133- 3 88133- 4 88133- 5

Gasoline:	ND<50	ND<50	ND<50	ND<50	ND<50
Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Toluene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Xylenes:	ND<1.5	ND<1.5	ND<1.5	ND<1.5	ND<1.5
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L

Laboratory Number: 88133- 6

Gasoline:	ND<50
Benzene:	ND<0.5
Toluene:	ND<0.5
Ethyl Benzene:	ND<0.5
Xylenes:	ND<1.5
Concentration:	ug/L

Superior Precision Analytical, Inc.

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Sierra Environmental
Attn: Chris Bramer

Project 1-206-04
Reported 12/09/92

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed	Matrix
87323- 1	TB-LB	12/01/92	12/08/92	Water
87323- 2	BB	12/01/92	12/08/92	Water
87323- 3	C-1	12/01/92	12/08/92	Water
87323- 4	C-2	12/01/92	12/08/92	Water
87323- 5	C-3	12/01/92	12/08/92	Water

RESULTS OF ANALYSIS

Laboratory Number: 87323- 1 87323- 2 87323- 3 87323- 4 87323- 5

Gasoline:	ND<50	ND<50	ND<50	ND<50	ND<50
Benzene:	ND<0.5	ND<0.5	0.6	ND<0.5	ND<0.5
Toluene:	ND<0.5	ND<0.5	3.5	ND<0.5	ND<0.5
Ethyl Benzene:	ND<0.5	ND<0.5	0.7	ND<0.5	ND<0.5
Xylenes:	ND<0.5	ND<0.5	3.4	ND<0.5	ND<0.5
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L



Superior Precision Analytical, Inc.

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Sierra Environmental
Attn: Chris Bramer

Project 1-206-04
Reported 09/16/92

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed Matrix
86607- 1	TB-LB	09/02/92	09/09/92 Water
86607- 2	BB	09/02/92	09/10/92 Water
86607- 3	C1	09/02/92	09/10/92 Water
86607- 4	C2	09/02/92	09/09/92 Water
86607- 5	C3	09/02/92	09/10/92 Water

RESULTS OF ANALYSIS

Laboratory Number: 86607- 1 86607- 2 86607- 3 86607- 4 86607- 5

Gasoline:	ND<50	ND<50	ND<50	ND<50	ND<50
Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Toluene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Xylenes:	ND<0.5	0.4	ND<0.5	ND<0.5	0.9
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L

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Sierra Environmental
Attn: CHRIS CONNER

Project 1-206-04
Reported 06/10/92

TOTAL PETROLEUM HYDROCARBONS

Lab #	Sample Identification	Sampled	Analyzed	Matrix
85871- 1	TB-LB	06/03/92	06/05/92	Water
85871- 2	BB	06/03/92	06/05/92	Water
85871- 3	C-1	06/03/92	06/05/92	Water
85871- 4	C-2	06/03/92	06/05/92	Water
85871- 5	C-3	06/03/92	06/10/92	Water

RESULTS OF ANALYSIS

Laboratory Number:	85871- 1	85871- 2	85871- 3	85871- 4	85871- 5
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Gasoline:	ND<50	ND<50	ND<50	ND<50	180
Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	3.0
Toluene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	1.4
Ethyl Benzene:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	0.6
Xylenes:	ND<0.5	ND<0.5	ND<0.5	ND<0.5	1.5
Concentration:	ug/L	ug/L	ug/L	ug/L	ug/L