STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

ORDER WQ 2013-0003-UST

In the Matter of Underground Storage Tank Case Closure

Pursuant to Health and Safety Code Section 25299.39.2 and the Low Threat Underground Storage Tank Case Closure Policy

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BY THE EXECUTIVE DIRECTOR[1]:

Pursuant to Health and Safety Code section 25299.39.2, the Manager of the Underground Storage Tank Cleanup Fund (Fund) recommends closure of the underground storage tank (UST) case at the site listed below.[2] The name of the Fund claimant, the Fund claim number, the site name and the applicable site address are as follows:

Chevron Products Company
Claim No. 6001
Chevron #9-0329
340 Highland Ave, Piedmont
Alameda County Environmental Health Department (Local Oversight Program)

I. STATUTORY AND PROCEDURAL BACKGROUND

Section 25299.39.2 directs the Fund manager to review the case history of claims that have been active for five years or more (five-year review), unless there is an objection from the UST owner or operator. This section further authorizes the Fund Manager to make recommendations to the State Water Resources Control Board (State Water Board) for closure of a five-year-review case if the UST owner or operator approves. In response to a recommendation by the Fund Manager, the State Water Board, or in certain cases the State Water Board Executive Director, may close a case or require the closure of a UST case. Closure of a UST case is appropriate where the corrective action ensures the protection of human health, safety, and the environment and where the corrective action is consistent with:

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[1] State Water Board Resolution No. 2012-0061 delegates to the Executive Director the authority to close or require the closure of any UST case if the case meets the criteria found in the State Water Board's Low Threat Underground Storage Tank Case Closure Policy adopted by State Water Board Resolution No. 2012-0016.

[2] Unless otherwise noted, all references are to the Health and Safety Code.

1) Chapter 6.7 of Division 20 of the Health and Safety Code and implementing regulations; 2) Any applicable waste discharge requirements or other orders issued pursuant to Division 7 of the Water Code; 3) All applicable state policies for water quality control; and 4) All applicable water quality control plans.

The Fund Manager has completed a five-year review of the UST case identified above, and recommends that this case be closed. The recommendation is based upon the facts and circumstances of this particular UST case. A UST Case Closure Review Summary Report has been prepared for the case identified above and the bases for determining compliance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closures (Low-Threat Closure Policy or Policy) are explained in the Case Closure Review Summary Report.

A. Low-Threat Closure Policy

In State Water Board Resolution No. 2012-0016, the State Water Board adopted the Low Threat Closure Policy. The Policy became effective on August 17, 2012. The Policy establishes consistent statewide case closure criteria for certain low-threat petroleum UST sites. In the absence of unique attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents, cases that meet the general and media-specific criteria in the Low-Threat Closure Policy pose a low threat to human health, safety and the environment and are appropriate for closure under Health and Safety Code section 25296.10. The Policy provides that if a regulatory agency determines that a case meets the general and media-specific criteria of the Policy, then the regulatory agency shall notify responsible parties and other specified interested persons that the case is eligible for case closure. Unless the regulatory agency revises its determination based on comments received on the proposed case closure, the Policy provides that the agency shall issue a closure letter as specified in Health and Safety Code section 25296.10. The closure letter may only be issued after the expiration of the 60-day comment period, proper destruction or maintenance of monitoring wells or borings, and removal of waste associated with investigation and remediation of the site.

Health and Safety Code section 25299.57, subdivision (l)(1) provides that claims for reimbursement of corrective action costs that are received by the Fund more than 365 days after the date of a closure letter or a Letter of Commitment, whichever occurs later, shall not be reimbursed unless specified conditions are satisfied. A Letter of Commitment has already been issued on the claim subject to this order and the respective Fund claimant, so the 365-day timeframe for the submittal of claims for corrective action costs will start upon the issuance of the closure letter.

II. FINDINGS

Based upon the UST Case Closure Review Summary Report prepared for the case attached hereto as Exhibit A, the State Water Board finds that corrective action taken to address the unauthorized release of petroleum at the UST release site identified as:

Claim No. 6001

Chevron #9-0329

ensures protection of human health, safety and the environment and is consistent with Chapter 6.7 of Division 20 of the Health and Safety Code and implementing regulations, the Low-Threat Closure Policy and other water quality control policies and applicable water quality control plans.

Pursuant to the Low-Threat Closure Policy, notification has been provided to all entities that are required to receive notice of the proposed case closure, a 60-day comment period has been provided to notified parties, and any comments received have been considered by the Board in determining that the case should be closed.

The UST case identified above may be the subject of orders issued by the Regional Water Quality Control Water Board (Regional Water Board) pursuant to Division 7 of the Water Code. Any orders that have been issued by the Regional Water Board pursuant to Division 7 of the Water Code, or directives issued by a Local Oversight Program agency for this case should be rescinded to the extent they are inconsistent with this Order.

III. ORDER

IT IS THEREFORE ORDERED that:

A. The UST case identified in Section II of this Order, meeting the general and media-specific criteria established in the Low-Threat Closure Policy, be closed in accordance with the following conditions and after the following actions are complete. Prior to the issuance of a closure letter, the Fund claimant is ordered to:

1. Properly destroy monitoring wells and borings unless the owner of real property on which the well or boring is located certifies that the wells or borings will be maintained in accordance with local or state requirements;

2. Properly remove from the site and manage all waste piles, drums, debris, and other investigation and remediation derived materials in accordance with local or state requirements; and

3. Within six months of the date of this Order, submit documentation to the regulatory agency overseeing the UST case identified in section II of this Order that the tasks in subparagraphs (1) and (2) have been completed.

B. The tasks in subparagraphs (1) and (2) of Paragraph (A) are ordered pursuant to Health and Safety Code section 25296.10 and failure to comply with these requirements may result in the imposition of civil penalties pursuant to Health and Safety Code section 25299 subdivision (d)(1). Penalties may be imposed administratively by the State Water Board or Regional Water Board.

C. Within 30 days of receipt of proper documentation from the Fund claimant that requirements in subparagraphs (1) and (2) of Paragraph (A) are complete, the regulatory agency that is responsible for oversight of the UST case identified in Section II of this Order shall notify the State Water Board that the tasks have been satisfactorily completed.

D. Within 30 days of notification from the regulatory agency that the tasks are complete pursuant to Paragraph (C), the Deputy Director of the Division of Financial Assistance shall issue a closure letter consistent with Health and Safety Code, section 25296.10, subdivision (g) and upload the closure letter and UST Case Closure Review Summary Report to GeoTracker.

E. As specified in Health and Safety Code section 25299.39.2 subdivision (a) (2), corrective action costs incurred after a recommendation of closure shall be limited to $10,000 per year unless the Board or its delegated representative agrees that corrective action in excess of that amount is necessary to meet closure requirements, or additional corrective actions are necessary pursuant to section 25296.10 subdivision (a) and (b). Pursuant to section 25299.57, subdivision (l) (1), and except in specified circumstances, all claims for reimbursement of corrective action costs must be received by the Fund within 365 days of issuance of the closure letter in order for the costs to be considered.

F. Any Regional Water Board or Local Oversight Program Agency directive or order that directs corrective action or other action inconsistent with case closure for the UST case identified in Section II is rescinded, but only to the extent the Regional Water Board order or Local Oversight Program Agency directive is inconsistent with this Order.

Thomas Howard
Executive Director

3/14/13
Date

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

UST CASE CLOSURE SUMMARY

Agency Information

Agency Name: Alameda County Environmental Health Department (Local Oversight Program (County)	Address: 1131 Harbor Bay Parkway, Alameda, CA 94502
Agency Caseworker: Mark Detterman	Case No. RO0000269

Case Information

USTCF Claim No.: 6001	Global ID: T0600101885
Site Name: Chevron #9-0329	Site Address: 340 Highland Avenue, Piedmont, CA 94611
Responsible Party: Chevron Environmental Management Company	Address: 6111 Bollinger Canyon Rd. San Ramon, CA 94583
USTCF Expenditures to Date: $214,832	Number of Years Case Open: 29

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600101885

Summary

The Low-Threat Underground Storage Tank Case Closure Policy (Low-Threat Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Low-Threat Policy. This case meets all of the required criteria of the Low-Threat Policy. A summary evaluation of compliance with the Low-Threat Policy is shown in **Attachment 1: Closure of Underground Storage Tank Sites' Checklist for Compliance with State Water Board Policies and State Law**. The Conceptual Site Model upon which the evaluation of the case has been made is described in **Attachment 2: Summary of Basic Site Information.** Highlights of the Conceptual Site Model of the case follow:

This is currently an active service station. A leak was reported in 1983. Since 1983, nine monitoring wells have been installed, and contaminated soil excavated. No soil or groundwater remedial actions have been implemented. According to groundwater data, water quality objectives have been achieved for all constituents except for TPH gasoline (TPHg) in three wells (C-2, C-3 & C-4), total petroleum hydrocarbons diesel (TPHd) in one well (C-3 off Site source), benzene in one well (C-2), and MTBE in one well (C-2). No public supply wells regulated by the California Department of Public Health (CDPH) within ½ mile of the Site. A total of 41 domestic, irrigation, cathodic protection, and monitoring wells have been identified within a one mile radius of the Site. These wells are not at risk because the residual petroleum hydrocarbons at the Site do not leave the Site. Water is provided to water users near the Site by the East Bay Municipal Utility District. It is highly unlikely that any groundwater that may be impacted will be used as a source of drinking water or other beneficial use in the foreseeable future.

The petroleum release is limited to the shallow soil and groundwater. The affected groundwater is not currently being used as a source of drinking water or for any other beneficial use, and it is highly unlikely that the affected groundwater will be used as a source of drinking water or for any other beneficial use in the foreseeable future. Public supply wells are usually constructed with competent sanitary seals and intake screens that are in deeper more protected aquifers. Other designated beneficial uses of impacted groundwater are not threatened and it is highly unlikely that they will be considering these factors in the context of the Site setting. Remaining petroleum hydrocarbon constituents are limited, stable and concentrations declining. Remedial actions have been implemented and further remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the conceptual model. Any remaining petroleum hydrocarbon constituents do not pose significant risk to human health, safety or the environment. The corrective action performed is protective of human health, safety, and the environment.

Rationale for Closure under the Low-Threat Policy

- General Criteria – Meets all eight general criteria.
- Groundwater – Site-specific analysis, using Groundwater-Specific Criterion (5)a, shows that under current and reasonably 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 timeframe.
- Vapor Intrusion to Indoor Air – Soil vapor evaluation is not required because site is an active commercial petroleum fueling facility.
- Direct Contact and Outdoor Air Exposure – This case meets Policy Criterion 3.B. A professional assessment of site-specific risk from exposure shows that maximum concentrations of petroleum constituents in soil will have no significant risk of adversely affecting human health.

Objections to Closure

The County states the following:

- Possibility of undocumented filled UST excavations at the site. Because the size of the undocumented UST complex is unknown the groundwater investigation at the Site is incomplete. The County has requested a work plan to locate the size and depth of the unknown USTs and conduct another soil vapor and sub-slab vapor assessment.
- Groundwater monitoring wells have submerged well screens so reported concentrations of contaminants may be lower than actual concentrations.
- Significant source remains based on the concentrations in one well (C-2) and five very shallow soil borings (0.5 to 1.5 feet below ground surface (bgs)) which indicates a significant source.
- Significant dissolved concentrations are flowing off site in seepage at the surface, preferential pathways, or storm drains.

Response to Objections to Closure

- A geophysical survey report was submitted on July 27, 2012, documenting that no other undocumented UST excavations are present at the Site.
- The wells have had submerged screens since 1983 and the County has accepted the data for 29 years and only recently raised a concern. During sampling activities, well

C-2 regularly is pumped dry during purging; the resulting sample, collected during recharge of the well, should be fairly representative of the groundwater conditions.

- Remaining concentrations in well C-2 are relatively low and decreasing. Contaminant plume is defined, stable and decreasing.
- In 2006, Cambria, conducted a Water Seep Assessment that reported that the primary constituents of concern when evaluating the risk associated with exposure to gasoline are the benzene, toluene, eythylbenzene, and toluene components. The results of the analysis of water ponded at the site during periods of seepage found that the ponded water does not pose significant risk to public health, safety or the environment. The dermal and vapor intrusion were also evaluated and did not meet the threshold criteria indicating adverse impact to indoor air quality.

Fund Manager Recommendation for Closure

Based on available information, residual petroleum hydrocarbons at the Site do not pose significant risks to human health, safety, or the environment, and the case meets the requirements of the Low-Threat Policy. Accordingly, the Fund Manager recommends that the case be closed. The State Water Board is conducting public notification. The County has the regulatory responsibility to supervise the abandonment of monitoring wells.

Lisa Babcock

Lisa Babcock, P.G. 3939, C.E.G. 1235

8/31/12

Date

ATTACHMENT 1: COMPLIANCE WITH STATE WATER BOARD POLICIES AND STATE LAW

The site complies with the State Water Resources Control Board policies and state law. Section 25296.10 of the Health and Safety Code requires that sites be cleaned up to protect human health, safety, and the environment. Based on available information, any residual petroleum constituents at the site do not pose significant risk to human health, safety, or the environment.

The site complies with the requirements of the Low-Threat Underground Storage Tank (UST) Case Closure Policy as described below.[1]

Is corrective action consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations? The corrective action provisions contained in Chapter 6.7 of the Health and Safety Code and the implementing regulations govern the entire corrective action process at leaking UST sites. If it is determined, at any stage in the corrective action process, that UST case closure is appropriate, further compliance with corrective action requirements is not necessary. Corrective action at this site has been consistent with Chapter 6.7 of the Health and Safety Code and implementing regulations and, since this case meets applicable case-closure requirements, further corrective action is not necessary, unless the activity is necessary for case closure.	☒ Yes ☐ No
Have waste discharge requirements or any other orders issued pursuant to Division 7 of the Water Code been issued at this site?	☐ Yes ☒ No
If so, was the corrective action performed consistent with any order? There was an order issued for this site. The corrective action performed in the past is consistent with that order. Since this case meets applicable case-closure requirements, further corrective action under the order that is not necessary, unless the activity is necessary for case closure.	☐ Yes ☐ No ☒ NA
General Criteria General criteria that must be satisfied by all candidate sites:	
Is the unauthorized release located within the service area of a public water system?	☒ Yes ☐ No
Does the unauthorized release consist only of petroleum?	☒ Yes ☐ No
Has the unauthorized ("primary") release from the UST system been stopped?	☒ Yes ☐ No
Has free product been removed to the maximum extent practicable?	☒ Yes ☐ No ☐ NA

[1] Refer to the Low-Threat Underground Storage Tank Case Closure Policy for closure criteria for low-threat petroleum UST sites.

	PASS
Has a conceptual site model that assesses the nature, extent, and mobility of the release been developed?	☒ Yes ☐ No
Has secondary source been removed to the extent practicable?	☒ Yes ☐ No
Has soil or groundwater been tested for MTBE and results reported in accordance with Health and Safety Code Section 25296.15?	☒ Yes ☐ No
Nuisance as defined by Water Code section 13050 does not exist at the site?	☒ Yes ☐ No
Are there unique site attributes or site-specific conditions that demonstrably increase the risk associated with residual petroleum constituents?	☐ Yes ☒ No
Media-Specific Criteria Candidate sites must satisfy all three of these media-specific criteria: **1. Groundwater:** 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: **Is the contaminant plume that exceeds water quality objectives stable or decreasing in areal extent?**	☒ Yes ☐ No ☐ NA
Does the contaminant plume that exceeds water quality objectives meet all of the additional characteristics of one of the five classes of sites? If YES, check applicable class: ☐ **1** ☐ **2** ☐ **3** ☐ **4** ☒ **5**	☒ Yes ☐ No ☐ NA
Do site soils contain insufficient mobile constituents (leachate, vapors, or light non-aqueous phase liquids) to threaten groundwater?	☒ Yes ☐ No ☐ NA
2. Petroleum Vapor Intrusion to Indoor Air: The site is considered low-threat for vapor intrusion to indoor air if site-specific conditions satisfy all of the characteristics of one of the three classes of sites (a through c) or if the exception for active commercial fueling facilities applies. **Is the site an active commercial petroleum fueling facility?** Exception: 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.	☒ Yes ☐ No
a. Do site-specific conditions at the release site satisfy all of the applicable characteristics and criteria of scenarios 1 through 3 or all of the applicable characteristics and criteria of scenario 4? If YES, check applicable scenarios: ☐ **1** ☐ **2** ☐ **3** ☐ **4**	☐Yes ☐ No ☒ NA

b. Has a site-specific risk assessment for the vapor intrusion pathway been conducted and demonstrates that human health is protected to the satisfaction of the regulatory agency?	☐ Yes ☐ No ☒ 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 petroleum vapors migrating from soil or groundwater will have no significant risk of adversely affecting human health?	☐ Yes ☐ No ☒ NA
3. Direct Contact and Outdoor Air Exposure: The site is considered low-threat for direct contact and outdoor air exposure if site-specific conditions satisfy one of the three classes of sites (a through c).	
a. Are maximum concentrations of petroleum constituents in soil less than or equal to those listed in Table 1 for the specified depth below ground surface (bgs)?	☐ Yes ☐ No ☒ NA
b. Are 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?	☒ Yes ☐ No ☐ 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?	☐ Yes ☐ No ☒ NA

ATTACHMENT 2: SUMMARY OF BASIC SITE INFORMATION (Conceptual Site Model)

Site Location/History

- The Site is currently an active service station operating at the corner of Highland Avenue and Highland Way in the City of Piedmont. The Site was formerly owned and operated by Chevron but was sold in 1990 to the Hoffman Investment Company.
- The land use in the immediate vicinity of the Site is commercial.
- In June 1983, soil contamination was identified.
- Nine monitoring wells have been installed and monitored regularly.
- Site map showing the location of the Site facilities, monitoring wells, and groundwater level contours is included at the end of this summary.

Pollutant Source

- Nature of Contaminants of Concern: Petroleum hydrocarbons only.
- Source, Date reported, and Status of Release: UST system, January 1983, USTs removed in 1989. A second source, City of Piedmont City Hall, is responsible for the diesel in the immediate area which is upgradient of the Site.
- Neither diesel nor oxygenated fuels were sold on this Site during Chevron's operation of the service station.
- Free-Phase Hydrocarbons: Historically, none currently.

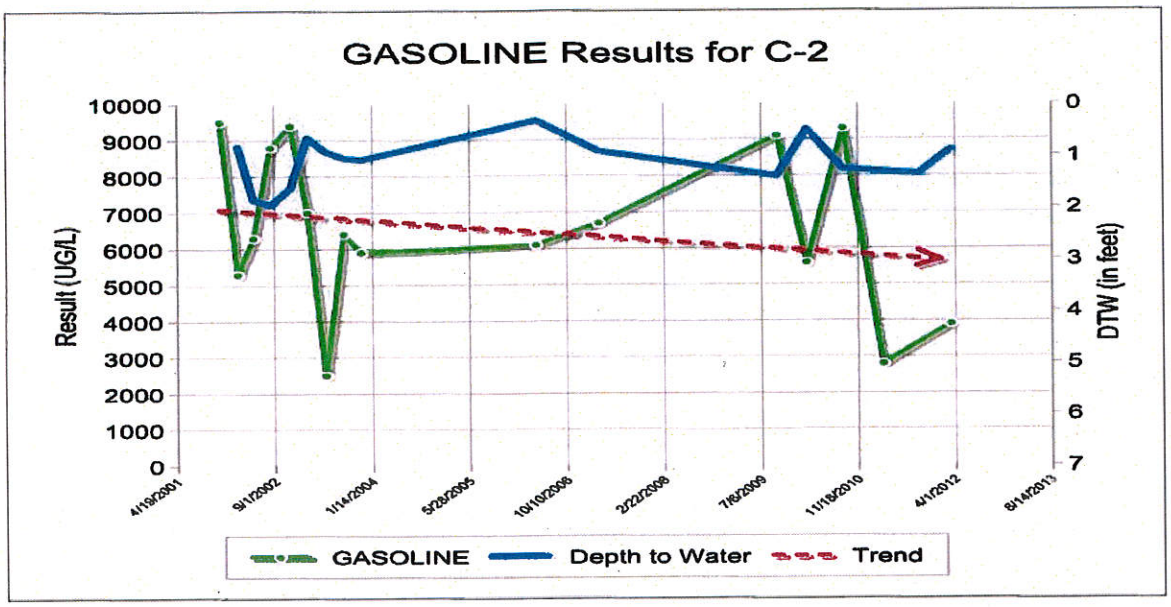
Geology/Hydrogeology

- Stratigraphy: A thin 2.5 to 5.0 foot-thick veneer of silts and sands is underlain by shallow bedrock, sandstone.
- Maximum Sample Depth: 18 feet bgs.
- Minimum Groundwater Depth: Artesian at monitoring well MW-6.
- Maximum Groundwater Depth: 6.4 feet (bgs) at monitoring well C-4.
- Current Average Depth to Groundwater: 1.5 feet bgs.
- Saturated Zones(s) Studied: Surface to 18 feet bgs.
- Groundwater Flow Direction: Southerly with an average gradient of 0.04 feet/foot (ft/ft) (March 2012).

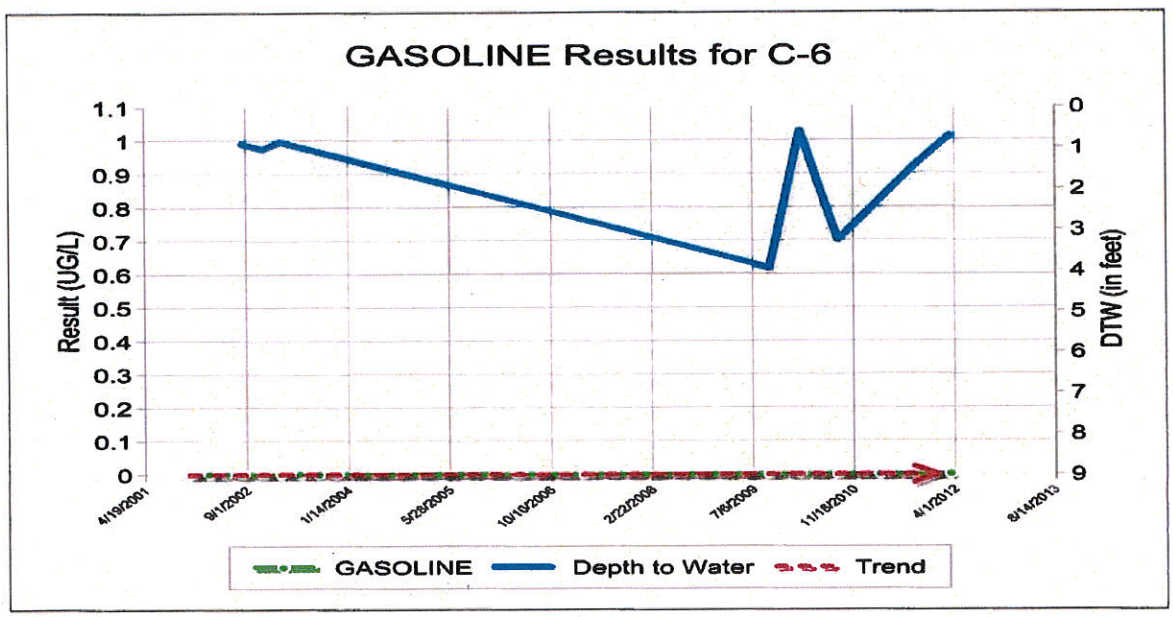
Groundwater Trends:

- There are 29 years of groundwater monitoring data for this Site that demonstrates the concentrations are decreasing and the plume is stable. Well C-2 is in the source area and well C-6 is 90 feet downgradient.

Source Area Well



Down Gradient Well



Receptors

- GW Basin: Santa Clara Valley - South Bay - East Bay Cities.
- Beneficial Uses: Municipal and Domestic Supply.
- Land Use Designation: Commercial.
- Public Water System: East Bay Municipal Utility District.
- Distance to Nearest Supply Well: According to data available in GeoTracker, there are no public supply wells regulated by CDPH within ½ mile of the Site. City of Piedmont Well #4 is located approximately 0.11 miles south of the Site and is used as an irrigation well for the City Park. Thirteen domestic and 28 other (monitoring, cathodic protection and irrigation) private wells were identified within a one mile radius of the Site.
- Distance to Nearest Surface Water: An intermittent creek is located in Piedmont Park approximately 336 feet south of the Site.

Risk Criteria

- Estimate of Hydrocarbon Mass in Soil: None reported.
- Soil/Groundwater tested for MTBE: Yes, see table below.
- Plume Length, Extent and Mobility: Petroleum hydrocarbon constituents are limited to a very small area downgradient of the former USTs near well C-2. The constituents of petroleum hydrocarbons present are a combination of upgradient sources (City Hall), possible fill material imported (not typical TPHd), current operations (MTBE and benzene) and past operations. This mix of sources indicates the petroleum hydrocarbons are moderately mobile in the thin veneer of soil overlying bedrock.
- Contaminated Zone(s) Used for Drinking Water: No.
- Risk from Residual Petroleum Hydrocarbon: RBCA Tier 2 evaluation completed, in 2002, for possible use as future residential land use. Using the residential risk factor of 1×10^{6} and the site conditions, contaminants indicate the risk was acceptable except for the ingestion pathway. Groundwater is not used in the area for a drinking water source. In 2006, soil vapors were resampled and were at concentrations below the environmental screening level for petroleum hydrocarbon constituents. The most current soil concentrations are below the thresholds in Table 1 of the Policy. However, there are no results in GeoTracker for naphthalene. The amount of naphthalene in gasoline is very low – generally on the order of 0.25 percent (Potter and Simmons, 1998). The amount of benzene, however, is on the order of 3 percent (ten times greater). Since the concentrations of benzene at this Site are lower than the Table 1 naphthalene threshold concentration, it is highly unlikely that naphthalene concentrations in soil at the Site, if any, exceed that threshold. Further, the Site is paved and accidental access to site soils is prevented. As an active gas station, any construction worker working at the Site or adjacent to the Site will be prepared for exposure in their normal daily work.

Remediation Summary (Secondary Source Removal)

- Free Product: Noted in C-2 (up to 0.75 inches) in 1987.
- Soil Excavation: Impacted soil was removed from the Site.
- In-Situ Soil and Groundwater Remediation: No remediation activities were implemented.

Chevron #9-0329
Claim No. 6001

August 2012

Supporting Site Data

Tank Information

Tank No.	Size in Gallons	Contents	Closed in Place/ Removed/Active	Date
1	550	Used Oil	Removed	September 1999
2	Unknown	Unknown	Removed	July 2012 Geophysical Survey

Monitoring Well Information

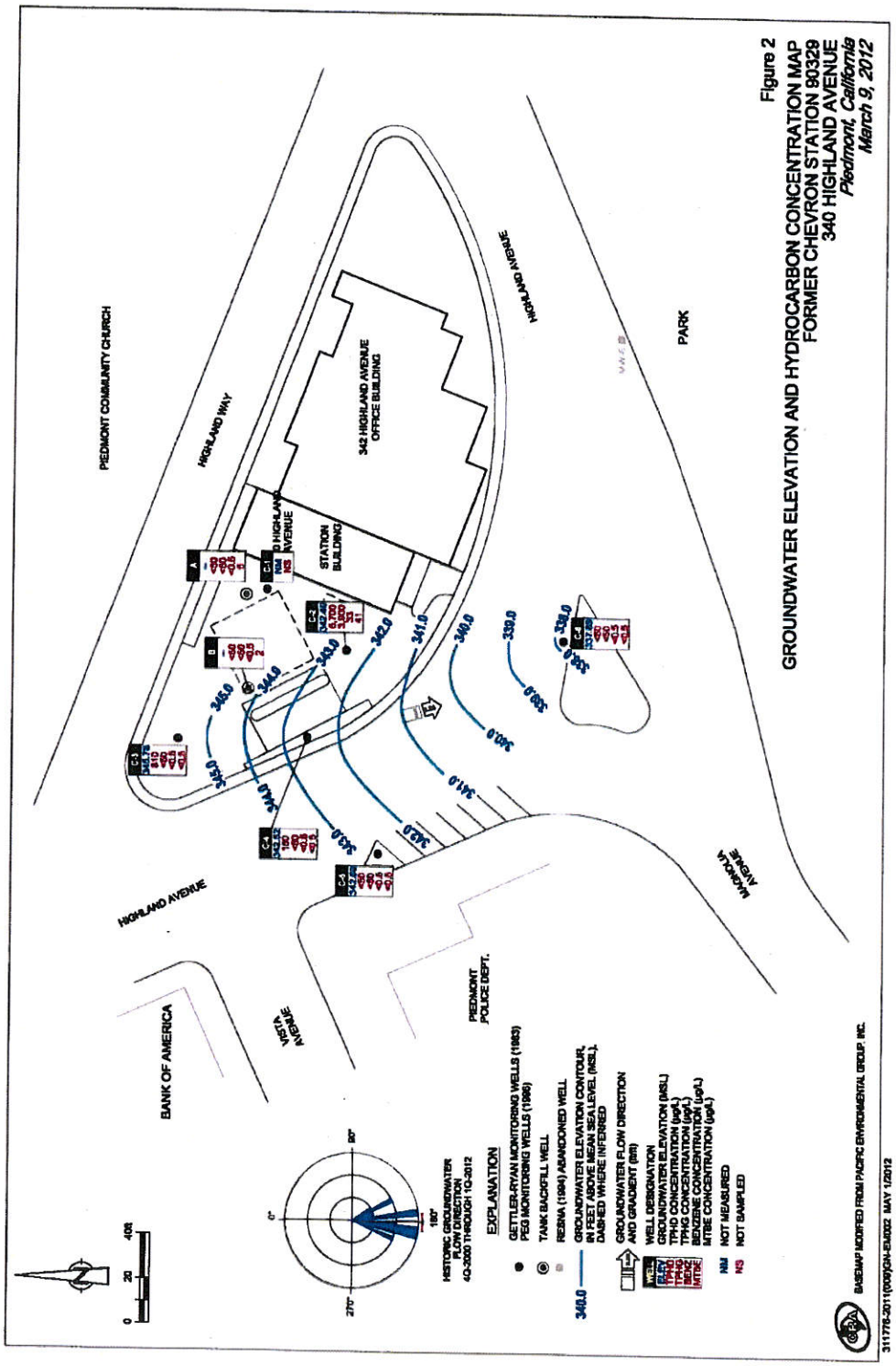
Well Designation	Date Installed	Screen Interval (feet bgs)	Depth to Water (feet bgs) (3/9/2012)
A	1983	Open bottom	1.37
B	1983	Open bottom	3.60
C-1	1983	7-17	Abandoned 1991
C-2[a]	1983	7-17	0.90
C-3	1983	7-17	1.42
C-4	1983	3-13	2.42
C-5	1996	3-18	2.45
C-6	1996	2.5-17.5	0.72
MW-6	1996	Unknown	Destroyed soon after installation due to artisan flow

[a] Note C-2 had 0.75 inches of free product last reported in 1987

Petroleum Hydrocarbon Constituent Concentration

Contaminant	Soil (mg/kg)		Water (ug/L)		WQOs (ug/L)
	Maximum 0-5 ft bgs [a]	Maximum 5-10 ft bgs [a]	Maximum [b]	Latest (3/9/2012)	
TPHg	5,800	1,600	56,000	3,900	NL
TPHd	NA	NA	5,900	5,700	NL
Benzene	0.23	0.16	2,500	33	1
Toluene	0.002	1.2	750	2	300
Ethylbenzene	7.1	12	800	3	700
Xylenes	7.9	37	6,000	5	1,750
MTBE	0.5	NA	210	41	5
TBA	0.14	NA	890	NA	1,200[c]
Naphthalene	NA	NA	NA	NA	170[d]

NA: Not Analyzed, Not Applicable or Data Not Available
NL: Not listed
mg/kg: milligrams per kilogram, parts per million
ug/L: micrograms per liter, parts per billion
WQOs: Water Quality Objectives, Region 2 Basin Plan
[a] According to Reports, soil
[b] According to Geotracker, wells
[c] CA Department of Health Services Notification Level
[d] CA Department of Health Services Action Level in drinking water


GROUNDWATER ELEVATION AND HYDROCARBON CONCENTRATION MAP
FORMER CHEVRON STATION 90329
340 HIGHLAND AVENUE
Piedmont, California
March 9, 2012
Figure 2
PIEDMONT COMMUNITY CHURCH
HIGHLAND WAY
342 HIGHLAND AVENUE OFFICE BUILDING
340 HIGHLAND AVENUE STATION BUILDING
HIGHLAND AVENUE
PARK
HIGHLAND AVENUE
BANK OF AMERICA
VISTA AVENUE
PIEDMONT POLICE DEPT.
MAGNOLIA AVENUE
EXPLANATION
GETTLER-RYAN MONITORING WELLS (1993)
PEG MONITORING WELLS (1999)
TANK BACKFILL WELL
RESNA (1994) ABANDONED WELL
GROUNDWATER ELEVATION CONTOUR, IN FEET ABOVE MEAN SEA LEVEL (MSL). DASHED WHERE INFERRED
GROUNDWATER FLOW DIRECTION AND GRADIENT (ft/ft)
WELL DESIGNATION
GROUNDWATER ELEVATION (MSL)
TPH-D CONCENTRATION (µg/L)
TPH-G CONCENTRATION (µg/L)
BENZENE CONCENTRATION (µg/L)
MTBE CONCENTRATION (µg/L)
NM NOT MEASURED
NS NOT SAMPLED
HISTORIC GROUNDWATER FLOW DIRECTION 4Q-2000 THROUGH 1Q-2012
0
20
40
BASEMAP MODIFIED FROM PACIFIC ENVIRONMENTAL GROUP, INC.
311778-2011(009)GN-EMI002 MAY 1/2012