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UNITED EL SEGUNDO, INC., RAPID GAS, INC.  
6 and CF UNITED PROPCO LLC

7 STATE OF CALIFORNIA  
8 STATE WATER RESOURCES CONTROL BOARD  
9

10 In the Matter of the Petition of  
11 UNITED EL SEGUNDO, INC., RAPID GAS,  
INC. and CF UNITED PROPCO LLC,  
12  
13 Petitioners

14 For Review of California Regional Water  
Quality Control Board, Santa Ana Region,  
15 Cleanup and Abatement CAO No. R8-2016-  
0048  
16

**PETITION NO.** \_\_\_\_\_  
**PETITION FOR REVIEW AND  
REQUEST FOR STAY**

17 Pursuant to Water Code § 13320 and Title 23, Sections 2050.5(c) and 2052 of the California  
18 Code of Regulations (“CCRs”), named Dischargers United El Segundo, Inc., Rapid Gas, Inc. and  
19 CF United PropCo LLC (collectively, “Petitioners”) hereby petition the State Water Resources  
20 Control Board (“State Board”) to modify or direct the California Regional Water Quality Control  
21 Board – Santa Ana Region (“Regional Board”) to modify Cleanup and Abatement Order No. R8-  
22 2016-0048 (“CAO”). Pursuant to Water Code § 13321 and Title 23, Section 2053 of the CCRs,  
23 Petitioners also petition the State Board to stay the CAO.

24 **I. NAME AND ADDRESS OF PETITIONERS**

25 The Petitioners are United El Segundo, Inc., a California corporation, Rapid Gas, Inc., a  
26 California corporation, and CF United PropCo LLC, a Delaware limited liability company, each of  
27 whom may be contacted through the undersigned legal counsel.  
28

1 **II. REGIONAL BOARD ACTION SUBMITTED FOR REVIEW**

2 Petitioners seek review of the following actions or inactions of the Regional Board set forth  
3 in the CAO<sup>1</sup>:

- 4 • Finding that former fee title holders of 6160 Arlington Avenue, Riverside (J. and R.  
5 Wong Family Limited Partnership – II, L.P. and 6160 Arlington Ave., LLC) who  
6 were named as “Responsible Parties” in Cleanup and Abatement Order No. R8-  
7 2015-0038 (DRAFT) and Cleanup and Abatement Order No. R8-2015-0038  
8 (REVISED DRAFT) should not be named as “Dischargers” in the CAO because (a)  
9 they are not current owners of any of the subject properties, (b) they cooperated with  
10 the investigation and cleanup work conducted by others during their period of  
11 ownership, and (c) there is currently no evidence to suggest that any of the  
12 petroleum hydrocarbons or volatile organic compound (VOC) pollutants present  
13 beneath, adjacent or in the downgradient Site vicinity are the result of releases or  
14 discharges stemming from business activities conducted by the former owners at  
15 6160 Arlington Avenue during the time it was controlled by the former owners.  
16 CAO ¶ 3(d).
- 17 • Finding that five (5) entities named as Dischargers are jointly and severally liable  
18 for the investigation and cleanup of commingled releases from two sites located at  
19 6160 Arlington Avenue, Riverside and 6020 Arlington Avenue, Riverside. CAO ¶  
20 3(f).
- 21 • Finding that the Dischargers from two distinct properties separated by Adams Street  
22 are sufficiently commingled to justify imposing joint and several liability and refusal  
23 to apportion responsibility for performing required remedial action. CAO ¶ 3(g).
- 24 • Refusal to designate CF United PropCo LLC as a secondarily liable party.
- 25 • Required Action (“RA”) that Petitioners submit a work plan and proposed schedule  
26 within 90 days of adoption of the CAO (September 8, 2016) for conducting  
27 groundwater investigations to fully delineate the lateral and vertical boundaries of  
28 the groundwater contaminant plume emanating from 6160 Arlington Avenue and,  
upon approval of the work plan, conduct all field work necessary to define the extent

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<sup>1</sup> A true and correct copy of the CAO is submitted as Exhibit “1.”

1 of the groundwater plume emanating from 6160 Arlington Avenue until the extent  
2 of the plume is fully delineated. CAO RA ¶ 2.

3 • Required Action that Petitioners prepare and submit a comprehensive remedial  
4 action plan (RAP) with a proposed time schedule that is sufficiently scaled in scope  
5 to remediate soil, soil gas and groundwater contamination within the boundary of  
6 and emanating from 6160 Arlington Avenue. CAO RA ¶ 3.

7 • Required Action that Petitioners conduct monthly groundwater gauging and  
8 measuring of free product thickness in and quarterly or semi-annual groundwater  
9 monitoring and sampling of wells within the property boundary of 6160 Arlington  
10 Avenue. CAO RA ¶ 4.

11 • Required Action that Petitioners conduct monthly groundwater gauging and  
12 measuring of free product thickness in and quarterly or semi-annual groundwater  
13 monitoring and sampling of wells south of 6160 Arlington Avenue and west of  
14 Adams Street. CAO RA ¶ 4.

15 • Required Action that Petitioners conduct monthly groundwater gauging and  
16 measuring of free product thickness in and quarterly or semi-annual groundwater  
17 monitoring and sampling of off-site wells on Adams Street. CAO RA ¶ 4.

18 • Required Action that Petitioners submit a proposed scope and schedule for routine  
19 soil gas testing of existing vapor probes VP-3 and VP-4 located within the property  
20 boundary of 6160 Arlington Avenue, VP-4 and VP-5 located on Colorado Avenue  
21 and VP-13 located on a residential property southeast of Colorado Avenue and west  
22 of Adams Street, including a proposal for installation of any new vapor wells, within  
23 30 days of adoption of the CAO (July 11, 2016), and initiate routine soil gas testing  
24 within 60 days from receipt of approval of the proposal by the Regional Board  
25 Executive Officer. CAO RA ¶ 5.

26 • Required Action that Petitioners submit quarterly progress reports regarding  
27 corrective action activities associated with 6160 Arlington Avenue. CAO RA ¶ 6.

28 • Required Action that Petitioners submit a revised RAP within 60 days of

1 notification from the Regional Board to propose a revised corrective action strategy  
2 capable of achieving the remedial objectives for remediation of contaminated soil,  
3 groundwater and/or abatement of soil vapor emissions for protection of human  
4 health associated with the release of gasoline at and emanating from 6160 Arlington  
5 Avenue and, upon approval, implement the Revised RAP in accordance with  
6 deadlines set forth by the Executive Officer. CAO RA ¶ 7.

7 **III. DATE OF REGIONAL BOARD ACTION**

8 The Regional Board adopted the CAO on June 10, 2016, and sent it to the Dischargers by  
9 certified mail on June 15, 2016.

10 **IV. STATEMENT OF REASONS WHY THE REGIONAL BOARD ACTION OR**  
11 **FAILURE TO ACT WAS INAPPROPRIATE OR IMPROPER**

12 **A. The CAO is inappropriate and improper because it imposes liability upon**  
13 **Petitioners to perform corrective action to address soil, soil gas and groundwater**  
14 **contamination at and downgradient of 6160 Arlington Avenue.**

15 A retail motor fuel facility was formerly located on the southwest corner of Arlington  
16 Avenue and Adams Street at 6160 Arlington Avenue, Riverside, CA (“6160 Arlington Avenue”). A  
17 release of gasoline occurred at 6160 Arlington Avenue. Gasoline constituents from 6160 Arlington  
18 Avenue have migrated off-site to the southeast and are now present south of 6160 Arlington Avenue  
19 and beneath Adams Street. Petitioners have never held fee title to nor operated a business at 6160  
20 Arlington Avenue. The direction of groundwater flow has been consistently toward the southeast.

21 A 76-branded retail motor fuel facility, formerly operated by Rapid Gas, Inc., formerly  
22 owned by United El Segundo, Inc. and presently owned and operated by CF United PropCo LLC, is  
23 located on the southeast corner of Arlington Avenue and Adams Street at 6020 Arlington Avenue  
24 Riverside, CA (“6020 Arlington Avenue”). A release of gasoline occurred at 6020 Arlington  
25 Avenue prior to the conveyance of fee title to CF United PropCo LLC. Gasoline constituents from  
26 6020 Arlington Avenue have migrated off-site to the southeast and are present in groundwater  
27 beneath 6020 Arlington Avenue and east of Adams Street. The direction of groundwater flow has  
28 been consistently toward the southeast.

1           Though the two referenced releases have commingled in groundwater, the commingling  
2 occurs east of Adams Street. In other words, the release from 6160 Arlington Avenue has migrated  
3 into the release from 6020 Arlington Avenue.<sup>2</sup>

4       **B. The CAO is inappropriate and improper because Petitioners have consistently**  
5 **complied with Regional Board directives,**

6           Petitioners have complied with Regional Board directives. Dischargers Restructure  
7 Petroleum Marketing Services of California, Inc. (“RPMS”), former operator of underground  
8 storage tanks (“USTs”) at 6160 Arlington Avenue, and My Montecito Inc., SH (“My Montecito”),  
9 current owner of 6160 Arlington Avenue, are recalcitrant. As set forth in the CAO, Regional Board  
10 staff sent numerous letters to RPMS requiring performance of corrective action. RPMS agreed to  
11 cooperate only when its agent CalClean, Inc., a remediation contractor, arranged for RPMS to  
12 submit an application to the Underground Storage Tank Cleanup Fund Commingled Plume Account  
13 (CP0050). When the funds from the Commingled Plume Account were depleted in December  
14 2014, CalClean, Inc. terminated its services and RPMS discontinued any involvement in corrective  
15 action. My Montecito has failed to respond to all directives issued by the Regional Board and has  
16 refused to allow access to 6160 Arlington Avenue since it became the fee title holder on or about  
17 April 29, 2013.

18           Notwithstanding the recalcitrance of RPMS and My Montecito, Petitioners have continued  
19 to perform corrective action to address the release from 6020 Arlington Avenue at their sole cost  
20 and expense since January 1, 2015. It is unfair to reward compliance by Petitioners with a CAO  
21 obligating Petitioners to assess and cleanup soil, soil gas and groundwater at and emanating from a  
22 property for which they have no legal ownership, control or access simply because the responsible  
23 parties are recalcitrant.

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26           

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27           <sup>2</sup> A true and correct copy of an undisputed technical report prepared by FREY  
28           Environmental, Inc. that was presented by Petitioners at the hearing on Cleanup and Abatement  
          Order No. R8-2015-0038 REVISED DRAFT) as Exhibit “7” is submitted as Exhibit “2.”

1           **C. The CAO is inappropriate and improper because it fails to include former**  
2 **owners of 6160 Arlington Avenue who were named as responsible parties in CAO No. R8-**  
3 **2015-0038 (DRAFT) and CAO No. R8-2015-0038 (REVISED DRAFT).**

4           As discussed above, Regional Board staff initially issued Cleanup and Abatement Order No.  
5 R8-2015-0038 (DRAFT) and CAO No. R8-2015-0038 (REVISED DRAFT) naming two former  
6 owners of 6160 Arlington Avenue, RPMS, My Montecito and Petitioners as “Responsible Parties”  
7 under Health and Safety Code § 25296.10 and Title 23, Section 2720 of the CCRs. Cleanup and  
8 Abatement Order No. No. R8-2015-0038 (DRAFT) and Cleanup and Abatement Order No. R8-  
9 2015-0038 (REVISED DRAFT) were supported by the Regional Board Executive Officer and  
10 technical staff as well as by State Board attorneys. After a conducting a hearing on Cleanup and  
11 Abatement Order No. R8-2015-0038 (REVISED DRAFT), the Regional Board issued the CAO  
12 which (a) removes all references to Health and Safety Code § 25296.10 and Title 23, Section 2720  
13 of the CCRs, (b) changes the nomenclature used to identify the entities subject to liability from  
14 “Responsible Parties” to “Dischargers” and (c) does not include the two former owners of 6160  
15 Arlington Avenue as dischargers or responsible parties.<sup>3</sup> The inaction by the Regional Board is an  
16 abuse of discretion.

17           The stated justification for the Regional Board’s exclusion of the former landowners is (a)  
18 they are not current owners of either of the subject properties, (b) they cooperated with the  
19 investigation and cleanup work conducted by others during their period of ownership, and (c) there  
20 is currently no evidence to suggest that any of the petroleum hydrocarbons or volatile organic  
21 compound (VOC) pollutants present beneath, adjacent to or in the downgradient Site vicinity are the  
22 result of releases or discharges stemming from business activities conducted by the former owners  
23 during their respective periods of ownership. CAO ¶ 3(d).

24           The Regional Board appears to have created a new test not found in State Board precedent  
25 for avoiding liability under Water Code §§ 13304 and 13267 and Health and Safety Code §

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26           <sup>3</sup> A redlined comparison version of Cleanup and Abatement Order No. R8-2015-0038  
27 (REVISED DRAFT) and the CAO that was circulated by the Regional Board’s Executive Officer  
28 on May 27, 2016 is submitted as Exhibit “3.”

1 25296.10. What could be referred to as an unintended consequence of the CAO is that the Regional  
2 Board has created a loop hole to avoid liability. Using the Regional Board’s rationale, a property  
3 owner who did not “release” or “discharge” a waste and who knowingly failed to abate a nuisance  
4 but did not obstruct others from abating the nuisance, may convey fee title and thereby free itself  
5 from liability under Water Code §§ 13304 and 13267 and Health and Safety Code § 25296.10.

6 **V. THE MANNER IN WHICH PETITIONERS ARE AGGRIEVED**

7 Petitioners are aggrieved by the CAO requirement that Petitioners perform corrective action  
8 to address soil, soil gas and groundwater contamination resulting from release(s) of gasoline at 6160  
9 Arlington Avenue, which they never owned nor operated, and which is located hydrogeologically  
10 cross-gradient from 6020 Arlington Avenue. In addition to the substantial cost of the work, the  
11 CAO provides that failure to comply will potentially subject Petitioners to enforcement action,  
12 including, but not limited to: (a) imposition of administrative civil liability pursuant to Water Code  
13 §§ 13268 and 13350 in an amount not to exceed \$1,000 and \$5,000, respectively, for each day on  
14 which a violation occurs; or (b) referral to the State Attorney General for injunctive or civil or  
15 criminal liability. CAO ¶ RA 10.

16 **VI. REQUESTED STATE BOARD ACTION**

17 **A. Request for Specific Action by the State Board**

18 Petitioners request that the State Board set aside the CAO in its entirety or modify the CAO  
19 RAs, or direct the Regional Board to set aside the CAO in its entirety or modify the CAO Ras, as  
20 follows:

- 21 • Add the two former owners of 6160 Arlington Avenue as Dischargers or  
22 Responsible Parties in the CAO.
- 23 • Designate CF United PropCo LLC as a secondarily liable party.
- 24 • Remove the RA that Petitioners submit a work plan and proposed schedule within 90  
25 days of adoption of the CAO (September 8, 2016) for conducting groundwater  
26 investigations to fully delineate the lateral and vertical boundaries of the  
27 groundwater contaminant plume within the boundary of and emanating from 6160  
28 Arlington Avenue and, upon approval of the work plan, conduct all field work

1 necessary to define the extent of the groundwater plume within the boundary of and  
2 emanating from 6160 Arlington Avenue until the extent of the plume is fully  
3 delineated. CAO RA ¶ 2.

- 4 • Remove the RA that Petitioners prepare and submit a comprehensive remedial action  
5 plan (RAP) with a proposed time schedule that is sufficiently scaled in scope to  
6 remediate soil, soil gas and groundwater contamination within the boundary of and  
7 emanating from 6160 Arlington Avenue. CAO RA ¶ 3.
- 8 • Remove the RA that Petitioners conduct monthly groundwater gauging and  
9 measuring of free product thickness in and quarterly or semi-annual groundwater  
10 monitoring and sampling of wells within the property boundary of 6160 Arlington  
11 Avenue. CAO RA ¶ 4.
- 12 • Remove the RA that Petitioners conduct monthly groundwater gauging and  
13 measuring of free product thickness in and quarterly or semi-annual groundwater  
14 monitoring and sampling of off-site wells north and south of 6160 Arlington Avenue  
15 and west of Adams Street. CAO RA ¶ 4.
- 16 • Remove the RA that Petitioners conduct monthly groundwater gauging and  
17 measuring of free product thickness in and quarterly or semi-annual groundwater  
18 monitoring and sampling of off-site wells north and south of 6160 Arlington Avenue  
19 and on Adams Street. CAO RA ¶ 4.
- 20 • Remove the RA that Petitioners submit a proposed scope and schedule for routine  
21 soil gas testing of existing vapor probes VP-3 and VP-4 located within the boundary  
22 of 6160 Arlington Avenue, VP-4 and VP-5 located on Colorado Avenue and VP-13  
23 located southeast of Colorado Avenue at Adams Elementary School, including a  
24 proposal for installation of any new vapor wells to assess VOCs in soil gas resulting  
25 from the discharge of gasoline from 6160 Arlington Avenue, within 30 days of  
26 adoption of the CAO (July 11, 2016), and initiate routine soil gas testing within 60  
27 days from receipt of approval of the proposal by the Regional Board Executive  
28 Officer. CAO RA ¶ 5.

- 1 • Remove the RA that Petitioners submit quarterly progress reports regarding  
2 corrective action activities associated with 6160 Arlington Avenue. CAO RA ¶ 6.
- 3 • Remove the RA that Petitioners submit a revised RAP within 60 days of notification  
4 from the Regional Board to propose revised corrective action strategy capable of  
5 achieving the remedial objectives for remediation of contaminated soil, groundwater  
6 and/or abatement of soil vapor emissions for protection of human health associated  
7 with the discharge of gasoline at and emanating from 6160 Arlington Avenue and  
8 upon approval, implement the Revised RAP in accordance with deadlines set forth  
9 by the Executive Officer. CAO RA ¶ 7.

10 **B. Request for Stay**

11 Petitioners request that the State Board issue a stay pursuant to Water Code § 13321 and  
12 Title 23, Section 2053 of the CCRs with regard to the RAs specified above. As demonstrated by the  
13 attached Declaration of Mark B. Gilmartin: (1) there will be substantial harm to Petitioners if a stay  
14 is not granted; (2) there is a lack of substantial harm to other interested persons and to the public  
15 interest if a stay is granted; and (3) there are substantial questions of fact or law regarding the CAO  
16 as evidenced by the fact that the State Board Office of Enforcement has asked the State Board to act  
17 on its own motion to review the CAO.

18 **VII. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL ISSUES**  
19 **RAISED BY THE PETITION**

20 **A. The CAO improperly imposes liability upon Petitioners to perform corrective**  
21 **action to address a condition of pollution for which Petitioners do not have liability under the**  
22 **guise that it is part of a commingled plume.**

23 Water Code § 13304(a) authorizes regional boards to issue an order compelling a person  
24 who has discharged waste into the waters of the state and created a condition of pollution or  
25 nuisance to clean up the waste or abate the effects of the waste. Water Code § 13304 does not  
26 authorize regional boards to compel a person to clean up waste that was discharged by a third party  
27 over whom and at a property over which the person did not have control.

1           The facts surrounding the sources of soil, soil gas and groundwater contamination were not  
2           disputed at the hearing conducted by the Regional Board. Petitioners presented evidence to  
3           demonstrate that: (a) the source of the soil, soil gas and groundwater contamination on and beneath  
4           the surface of 6160 Arlington Avenue is from a discharge that occurred at 6160 Arlington Avenue;  
5           (b) the source of the off-site soil, soil gas and groundwater contamination south of 6160 Arlington  
6           Avenue and west of Adams Street is a discharge that originated at 6160 Arlington Avenue; and (c)  
7           the source of the soil, soil gas and groundwater contamination beneath the surface of Adams Street  
8           is a discharge that originated at 6160 Arlington Avenue.

9           The Prosecution Team in the proceeding that led to the adoption of the CAO argued in favor  
10          of imposition of joint and several liability and against apportionment of responsibility for the  
11          “commingled plume” that resulted from discharges at 6160 Arlington Avenue and 6020 Arlington  
12          Avenue. Prior State Board decisions do not absolutely require imposition of joint and several  
13          liability. Rather, each case should be considered on its own facts.

14          The most recent State Board decision on the issue of joint and several liability is State Water  
15          Resources Control Board Order WQ 2013-019 (*Salvatore*). The decision in *Salvatore* arose from a  
16          petition for closure of a UST case in Santee. Petitioner argued that his UST case should be closed  
17          because the source of on-site MTBE was an upgradient release at a United States Border Patrol site.  
18          Although the State Board noted that when releases from two or more sources commingle, the State  
19          Board generally considers all responsible parties for the separate releases as jointly and severally  
20          liable for the comingled release. In deciding whether the petitioner should be relieved of  
21          responsibility, the State Board established a new a test, expanding the test established in State Water  
22          Control Board Order WQ 2002-0021 (*Mohammadian*), for removing parties from responsibility for  
23          commingled plumes. The State Board concluded that if a party’s unauthorized release has been  
24          adequately characterized and there are sufficient data to determine that the individual release could  
25          be closed, then the party responsible for that release may be relieved from responsibility even  
26          though the release has commingled with another.

27          Other State Board precedents can be cited in support of joint and several liability, but most  
28          deal with releases at single site. *E.g.*, Order No. WQ 2009-0001-UST (*Ultramar, Inc.*). In one

1 case cited in support of joint and several liability (State Water Resources Control Board Order No.  
2 WQ 90-2 (*Union Oil Company of California*), the State Board considered a cleanup and abatement  
3 order issued in connection with a large plume of groundwater contamination in San Diego  
4 encountered during the Marina Redevelopment Project. While the specific details of the cleanup  
5 and abatement order were not discussed in the decision, the decision acknowledges the practicalities  
6 of dealing with commingled plumes. One approach to commingled plumes recognized by the State  
7 Board is performance of cleanups in a coordinated fashion with coordinated tasks and time  
8 schedules to all persons who are legally responsible. Order p. 8-9. More specifically, the State  
9 Board indicated that “[t]here may, of course, be tasks which are appropriately required only by the  
10 dischargers to an individual site. An example would be cleanup of contaminated soil below the  
11 site.” Order p. 8 fn. 6.

12 The CAO inappropriately obligates all Dischargers to perform all RAs or be subject to civil  
13 penalties. In an ideal circumstance, the dischargers themselves would agree upon coordinated tasks  
14 or cost sharing. In this case, the Regional Board is well aware that the dischargers named for 6160  
15 Arlington Avenue are either without assets, recalcitrant or both. It is patently unfair to make  
16 Petitioners liable for performance of assessment and cleanup within the boundaries of 6160  
17 Arlington Avenue. It is equally unfair to require Petitioners to assess or cleanup off-site soil, soil  
18 gas and groundwater contamination that is not commingled and is clearly attributable to a discharge  
19 from 6160 Arlington Avenue. The State Board should direct the Regional Board to modify the  
20 CAO to require performance of coordinated RAs.

21 **B. The Regional Board failed to consider Petitioners’ request to make CF United**  
22 **PropCo secondarily responsible.**

23 The State Board has considered the issue of secondary liability on many occasions. Factors  
24 are set forth in State Water Resources Control Board Order No. 89-12 (*San Diego Unified Port*  
25 *District*). Applying those factors to CF United PropCo LLC, it is clear that secondary liability is  
26 appropriate. CF United PropCo LLC has allowed access to 6020 Arlington Avenue since it  
27 obtained fee title two years ago. CF United PropCo LLC acquired title after the leaking USTs were  
28 replaced. Petitioners Rapid Gas, Inc. and United El Segundo, Inc. have performed corrective action

1 as required by Regional Board staff. CF United PropCo LLC should accordingly be assigned  
2 secondary liability status.

3 **C. The CAO draws a distinction between current and former landowner liability.**

4 The CAO is predicated upon Water Code §§ 13304 and 13267. The CAO imposes  
5 liability under those two statutes against two current landowners who acquired title to properties  
6 after the occurrence of releases of gasoline from USTs formerly operated on the respective  
7 properties. The CAO does not impose liability against two former landowners who acquired title to  
8 6160 Arlington Avenue because: (a) they are not current owners of either of the subject properties,  
9 (b) they cooperated with the investigation and cleanup work conducted by others during their period  
10 of ownership, and (c) there is currently no evidence to suggest that any of the petroleum  
11 hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent or in the  
12 downgradient Site vicinity are the result of releases or discharges stemming from business activities  
13 conducted by the former owners during their respective periods of ownership. CAO ¶ 3(d).

14 It is noteworthy that Water Code § 13304 imposes liability upon any person who has  
15 “discharged” or “discharges” waste into the waters of this state and creates, or threatens to create, a  
16 condition of pollution or nuisance. Current or former ownership is not a factor for liability.

17 Water Code § 13304 (a) provides in relevant part: “A person who has discharged or  
18 discharges waste into the waters of this state in violation of any waste discharge requirement or  
19 other order or prohibition issued by a regional board or the state board, or who has caused or  
20 permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited  
21 where it is, or probably will be, discharged into the waters of the state and creates, or threatens to  
22 create, a condition of pollution or nuisance, shall, upon order of the regional board, clean up the  
23 waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other  
24 necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.”

25 Both the Prosecution Team in advocating for adoption of Cleanup and Abatement Order No.  
26 R8-2015-0038 (REVISED DRAFT) and, most recently, the State Board Office of Enforcement in  
27 asking pursuant to Water Code § 13320(a) that the State Board review the issue of interim  
28 landowner liability on its own motion, have provided ample points and authorities regarding the

1 issue of former or interim owner liability which will not be repeated herein except to again note: (a)  
2 the lack of distinction under Water Code § 13304(a) between current and former owners who  
3 acquired ownership of a property after the initial release of a waste; (b) the lack of support in the  
4 law for the exception to liability created by the Regional Board for former owner liability; and (c)  
5 the Regional Board, for some inexplicable reason, did not include in the CAO references to Health  
6 and Safety Code § 25296.10 and Title 23, Section 2720 contained in Cleanup and Abatement Order  
7 No. R8-2015-0038 (REVISED DRAFT). Presumably, the references were not included to facilitate  
8 exculpation of the two former landowners.

9 **VIII. THE PETITION HAS BEEN SENT TO THE REGIONAL BOARD, DISCHARGERS**  
10 **AND OTHER INTERESTED PARTIES**

11 A copy of this Petition has been sent by email to the Regional Board, the Dischargers named  
12 in the CAO and other interested parties as follows:

- 13 • Kurt V. Berchtold, Regional Board Executive Officer  
14 ([kurt.berchtold@waterboards.ca.gov](mailto:kurt.berchtold@waterboards.ca.gov))
- 15 • Cris Carrigan, State Board Director of Office of Enforcement  
16 ([cris.carrigan@waterboards.ca.gov](mailto:cris.carrigan@waterboards.ca.gov))
- 17 • David Boyers, Assistant Chief Counsel ([david.boyers@waterboards.ca.gov](mailto:david.boyers@waterboards.ca.gov))
- 18 • Restructure Petroleum Marketing Services of California, Inc. ([rpmsca@aol.com](mailto:rpmsca@aol.com))
- 19 • My Montecito Inc., SH ([myoonessi75@gmail.com](mailto:myoonessi75@gmail.com))
- 20 • J. and R. Wong Family Limited Partnership – II, L.P., c/o Danielle Sakai, Esq.,  
21 ([danielle.sakai@bbklaw.com](mailto:danielle.sakai@bbklaw.com))
- 22 • 6160 Arlington Ave., LLC, c/o Sean M. Sherlock, Esq. ([ssherlock@swlaw.com](mailto:ssherlock@swlaw.com))

23 **IX. THE ISSUES RAISED IN THIS PETITION WERE PRESENTED TO THE**  
24 **REGIONAL BOARD, EXCEPT FOR ISSUES CONTAINED IN A SUPPLEMENTAL**  
25 **BRIEF THAT THE EXECUTIVE OFFICER AND REGIONAL BOARD COUNSEL**  
26 **DECLINED TO PRESENT TO THE REGIONAL BOARD**

27 On August 5, 2015, Regional Board staff issued Cleanup and Abatement Order No. R8-  
28 2015-0038 (DRAFT) naming seven entities, including the five (5) Dischargers named in the CAO

1 and two (2) former owners of 6160 Arlington Avenue, as responsible parties . On October 21,  
2 2015, a Prosecution Team comprised of State Board staff attorneys and Regional Board technical  
3 staff served Prosecution Team’s Evidence Submission for Cleanup and Abatement Order No. R8-  
4 2015-0038 (“Prosecution Team’s Opening Brief”). The Prosecution Team’s Opening Brief  
5 included Cleanup and Abatement Order No. R8-2015-0038 (REVISED DRAFT). On November 6,  
6 2015, Petitioners served Rapid Gas, Inc. United El Segundo, Inc. and CF United PropCo LLC Legal  
7 and Technical Analysis Opposing Draft Cleanup and Abatement Order No. R8-2015-0038.<sup>4</sup> On  
8 November 20, 2015, the Prosecution Team served a Prosecution Team’s Rebuttal Brief Supporting  
9 Cleanup and Abatement Order R8-2015-0038.

10 On December 11, 2015, the Regional Board conducted a hearing on Cleanup and Abatement  
11 Order No. R8-2015-0038 (REVISED DRAFT). Petitioners presented evidence and legal argument.  
12 At the conclusion of the hearing, the Regional Board took the matter under submission.

13 On May 27, 2016, the Regional Board Executive Officer circulated the CAO that is the  
14 subject of this Petition. On June 4, 2016, Petitioners submitted a letter brief to the Regional Board  
15 Executive Officer.<sup>5</sup> The purpose of the letter brief was to address issues raised in the CAO; *i.e.*, the  
16 failure to include the two former owners of 6160 Arlington Avenue previously named as  
17 responsible parties in Cleanup and Abatement Order No. R8-2015-0038 (REVISED DRAFT). On  
18 June 9, 2016, counsel for the Regional Board informed Petitioners that the letter brief would not be  
19 submitted to the Regional Board, “and there will be no opportunity to provide any additional  
20 comments in this matter.”

21 **X. CONCLUSION**

22 For the foregoing reasons, Petitioners respectfully request that the State Board set aside the  
23 CAO in its entirety or modify the CAO RAs, or direct the Regional Board to set aside the CAO in  
24 its entirety or modify the CAO RAs, as identified in Section VI.A above.

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25 <sup>4</sup> A true and correct copy of Rapid Gas, Inc. United El Segundo, Inc. and CF United PropCo  
26 LLC Legal and Technical Analysis Opposing Draft Cleanup and Abatement Order No. R8-2015-  
0038 is submitted as Exhibit “4.”

27 <sup>5</sup> A true and correct copy of the letter brief is submitted as Exhibit “5”.

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DATED: July 10, 2016

LAW OFFICES OF MARK B. GILMARTIN

By:           /s/Mark B. Gilmartin \_\_\_\_\_  
Mark B. Gilmartin  
Attorney for Petitioners  
United El Segundo, Inc.,  
Rapid Gas, Inc. and  
CF United PropCo LLC

**DECLARATION OF MARK B. GILMARTIN**

I, Mark B. Gilmartin, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California. I am counsel for Rapid Gas, Inc., United El Segundo, Inc. and CF United PropCo LLC (“Petitioners”) with regard to CAO No. R8-2016-0048 (“CAO”) issued by the Regional Water Quality Control Board, Santa Ana Region (“Regional Board”) pursuant to Water Code §§ 13304 and 13267 requiring corrective action to address “releases” or “discharges” of gasoline at a property located on the southwest corner of Arlington Avenue and Adams Street at 6160 Arlington Avenue, Riverside, CA (“6160 Arlington Avenue”), and a property located on the southeast corner of Arlington Avenue and Adams Street at 6020 Arlington Avenue, Riverside, CA (“6020 Arlington Avenue”).

2. I make this declaration in support of Petitioners’ request for a stay of the CAO’s Required Actions directing Petitioners to perform corrective action to address discharges of gasoline at and emanating from 6160 Arlington Avenue.

3. The facts set forth herein are personally known to me. If called as a witness, I could and would testify thereto under oath.

4. There will be substantial harm to Petitioners if a stay is not granted. The CAO includes Required Actions on and about 6160 Arlington Avenue. Petitioners have never held fee title to 6160 Arlington Avenue. Petitioners have never leased or conducted business activities at 6160 Arlington Avenue. Since acquiring fee title to 6160 Arlington Avenue, My Montecito Inc., SH (“My Montecito”) has refused to grant access. My Montecito has refused to share costs or otherwise participate in corrective action required by Regional Board staff or the CAO. Discharger Restructure Petroleum Marketing Services of California, Inc. (“RPMS”) has refused to participate in performance of corrective action since 2014, and has informed me it is without assets and will not do so.

5. There will not be any substantial harm to other interested persons or to the public interest if a stay is granted. Petitioners are performing corrective action to address soil, soil gas and groundwater contamination at and emanating from 6020 Arlington Avenue. The primary source of soil and groundwater contamination was removed from 6160 Arlington Avenue approximately





EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

**Santa Ana Regional Water Quality Control Board**

June 15, 2016

**VIA CERTIFIED MAIL**

**NO. 7005-1820-0000-6841-9544**

Restructure Petroleum Marketing  
Services of California, Inc.

Attn: Jeannie Newman  
3343 Kingfisher Drive  
Holiday, Florida 34690  
[rpmsca@aol.com](mailto:rpmsca@aol.com)

**VIA CERTIFIED MAIL**

**NO. 7005-1820-0000-6841-9551**

6160 Arlington Ave., LLC  
c/o Sean M. Sherlock  
Snell & Wilmer L.L.P.  
600 Anton Boulevard, Suite 1400  
Costa Mesa, California 92626  
[ssherlock@swlaw.com](mailto:ssherlock@swlaw.com)  
[lbarron@swlaw.com](mailto:lbarron@swlaw.com)

**VIA CERTIFIED MAIL**

**NO. 7005-1820-0000-6841-9568**

United El Segundo, Inc.  
Rapid Gas, Inc.  
CF United PropCo LLC  
c/o Mark B. Gilmartin, Esq.  
1534 17<sup>th</sup> Street, Suite 103  
Santa Monica, California 90404-3452  
[mark@mbgilmartinlaw.com](mailto:mark@mbgilmartinlaw.com)

**VIA CERTIFIED MAIL**

**NO. 7005-1820-0000-6841-9575**

J and R Wong Family Limited  
Partnership – II LP  
c/o Danielle Sakai  
Best, Best & Krieger  
3390 University Avenue, 5<sup>th</sup> Floor  
Riverside, California 92501  
[Danielle.Sakai@bbklaw.com](mailto:Danielle.Sakai@bbklaw.com)

**VIA CERTIFIED MAIL**

**NO. 7005-1820-0000-6841-9582**

My Montecito Inc., SH  
Attn: Mahmood Yoonessi  
6790 Crest Road  
Rancho Palos Verdes, California 90275  
[myoonessi@cox.net](mailto:myoonessi@cox.net)  
[myoonessi75@gmail.com](mailto:myoonessi75@gmail.com)

**CLEANUP AND ABATEMENT ORDER NO. R8-2016-0048 REGARDING THE PROPERTIES LOCATED AT 6020 ARLINGTON AVENUE AND 6050 ARLINGTON AVENUE (REFERENCED CURRENTLY BY 6160 ARLINGTON AVENUE), RIVERSIDE, CALIFORNIA, AND SURROUNDING PROPERTIES IMPACTED BY DISCHARGES OF PETROLEUM PRODUCTS FROM THESE SITES (GLOBAL ID# 0606500004/0606535975); RB CASE NO. 083300039T/083304005T)**

Ladies and Gentlemen,

We are enclosing a copy of Cleanup and Abatement Order (CAO) No. R8-2016-0048, issued pursuant to California Water Code Section 13304. The CAO requires investigation and cleanup of contaminants that have impacted, are impacting or threaten to impact the beneficial uses of groundwater in the Arlington Groundwater

WILLIAM RUH, CHAIR | KURT V. BERCHTOLD, EXECUTIVE OFFICER

3737 Main St., Suite 500, Riverside, CA 92501 | [www.waterboards.ca.gov/santaana](http://www.waterboards.ca.gov/santaana)

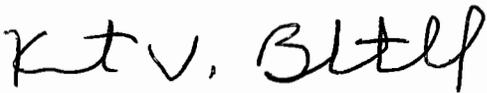
♻️ RECYCLED PAPER

Management Zone, as a result of discharges of petroleum products from the above-referenced sites located in Riverside, California.

This CAO was adopted by the Santa Ana Regional Water Quality Control Board (Regional Board) during the Regional Board's June 10, 2016 meeting.

If you have any questions, please contact me at (951) 782-3286, or by email correspondence at [kurt.berchtold@waterboards.ca.gov](mailto:kurt.berchtold@waterboards.ca.gov).

Sincerely,



Kurt V. Berchtold  
Executive Officer  
Santa Ana Regional Water Quality Control Board

Enclosures: CAO No. R8-2016-0048

cc w/enclosure:

David Rice – SWRCB - OCC, [David.Rice@waterboards.ca.gov](mailto:David.Rice@waterboards.ca.gov)  
David Boyers – SWRCB - OE, [David.Boyers@waterboards.ca.gov](mailto:David.Boyers@waterboards.ca.gov)  
Kailyn Ellison – SWRCB - OE, [Kailyn.Ellison@waterboards.ca.gov](mailto:Kailyn.Ellison@waterboards.ca.gov)  
Hope Smythe – Santa Ana RWQCB, [Hope.Smythe@waterboards.ca.gov](mailto:Hope.Smythe@waterboards.ca.gov)  
Ann Sturdivant – Santa Ana RWQCB, [Ann.Sturdivant@waterboards.ca.gov](mailto:Ann.Sturdivant@waterboards.ca.gov)  
Ken Williams – Santa Ana RWQCB, [Ken.Williams@waterboards.ca.gov](mailto:Ken.Williams@waterboards.ca.gov)  
Valerie Jahn-Bull – Santa Ana RWQCB, [Valerie.Jahn-Bull@waterboards.ca.gov](mailto:Valerie.Jahn-Bull@waterboards.ca.gov)

**State of California**  
**California Regional Water Quality Control Board**  
**Santa Ana Region**

3737 Main Street, Suite 500, Riverside, California 92501-3348  
Phone (951) 782-4130 - FAX (951) 781-6288 - TDD (951) 782-3221  
<http://www.waterboards.ca.gov/santaana>

**CLEANUP AND ABATEMENT ORDER NO. R8-2016-0048**

Directing

Restructure Petroleum Marketing Services of California, Inc.;

United El Segundo, Inc.;

Rapid Gas, Inc.;

My Montecito Inc., SH;

and

CF United PropCo LLC

(Collectively referred to as the Dischargers)

To Cleanup and Abate the Effects of Pollution and Nuisance  
at

The parcels located at 6020 Arlington Avenue and 6160 Arlington Avenue (which includes a parcel formerly identified as 6050 Arlington Avenue); and surrounding impacted parcels in the City of Riverside, California, affected by commingled contamination emanating therefrom (the Site).

This Order is being issued pursuant to authority granted under the Porter-Cologne Water Quality Control Act (Water Code) sections 13304 and 13267.

The California Regional Water Quality Control Board, Santa Ana Region (Regional Board), finds the following:

**PROPERTY OWNERSHIP AND SITE OPERATIONS**

**1. 6020 Arlington Avenue Property:**

- a. A gasoline service station facility owned by United El Segundo, Inc. (United) at the 6020 Arlington Avenue address, referenced by assessor parcel number (APN) 227-022-042, in Riverside, California from at least 1997 until 2014. Rapid Gas, Inc. (Rapid Gas) operated the service station facility at the above-referenced address dating back to at least 1992.
- b. United was also the owner and Rapid Gas was the operator of the UST system, including four USTs (1-20,000 gallon; 1-10,000 gallon; 2-5,000 gallon capacity) and associated product delivery components, which were identified as a source of

hydrocarbon contamination. The leaky tank system was removed in 2002 and replaced and/or upgraded in conjunction with improvements and ongoing retail fueling operations.

- c. United sold the property and all improvements, including the underground storage tank (UST) system and product delivery components, to CF United PropCo LLC (CF PropCo) in July 2014. CF PropCo is the current landowner and fee titleholder, as well as the registered tank operator associated with retail fueling activities currently being conducted at the 6020 Arlington Avenue property.

**2. 6050 Arlington Avenue Property:**

- a. County records indicate that the 6050 Arlington Avenue property, referenced currently by a 6160 Arlington Avenue street address, was formerly occupied by a retail gasoline service station that was owned and operated by E-Z Serve of California, Inc. (E-Z Serve) until around 1986. Records further indicate that the service station (APN 191-190-005) and adjacent parcels (APN 191-190-002 and 191-190-003) located in Riverside, California, were subsequently redeveloped into a commercial shopping center, which still occupies the former footprint of the E-Z Serve facility and adjacent parcels along Arlington Avenue, immediately west of Adams Avenue.
- b. E-Z Serve ceased retail-fueling operations at its service stations throughout California in approximately 1985 or 1986. On April 22, 1997, Restructure, Inc. purchased all shares of capital stock in E-Z Serve Petroleum Marketing Company, inclusive of the company itself and all subsidiaries. As a result of this transaction, E-Z Serve Petroleum Marketing of California, Inc. became the wholly-owned subsidiary of Restructure, Inc. Restructure, Inc. subsequently renamed E-Z Serve Petroleum Marketing Company of California, Inc. to Restructure Petroleum Marketing Services of California, Inc. (RPMS). According to RPMS representatives, RPMS has no assets or net worth, other than the bank account it maintains for purposes of collecting (and dispersing) reimbursement monies paid to the claimant by the State's Underground Storage Tank Cleanup Fund (USTCF) for corrective action activities conducted at contaminated properties formerly operated by E-Z Serve throughout California.
- c. In 2001, the J and R Wong Family Limited Partnership – II, LP (J and R Wong) purchased the commercial shopping center property, inclusive of the former E-Z Serve parcel and other adjacent parcels collectively identified by a 6160 Arlington Avenue address. A Phase I Site Assessment performed in conjunction with due diligence prior to the property transfer failed to identify the property's former operational history as a gas station. However, several other properties in the vicinity with recognized contaminant plumes were identified as representing a potential source of pollution or contamination that could impact the property. The closest of these sites to be identified was the operating United and/or Rapid Gas service station situated immediately across the street to the east, at 6020 Arlington Avenue. Since the property itself was not identified as a current or historic source of contamination, the report concluded that the presence of contamination beneath the property could be attributed to contaminant transport from these other documented releases via groundwater flow/migration. Only through subsequent investigations completed by United and/or Rapid Gas was the legacy of the 6050 Arlington Avenue property's operational history revealed/discovered.

- d. J and R Wong sold the 6160 Arlington Avenue shopping center property, inclusive of the parcel once occupied by the E-Z Serve station, to a limited liability corporation identified as 6160 Arlington Ave., LLC, on November 17, 2011. The property was purchased by 6160 Arlington Ave., LLC with knowledge and understanding of its impaired condition, as well as the ongoing investigations and testing being conducted in conjunction with efforts to mitigate the former E-Z Serve release. 6160 Arlington Ave., LLC retained ownership of the shopping center property until April 2013.
- e. On April 29, 2013, 6160 Arlington Ave., LLC sold the shopping center property, inclusive of the former E-Z Serve station footprint, via internet auction. According to 6160 Arlington Ave, LLC, the property was offered in "as-is" condition and proper disclosure of the property's impaired environmental condition was conveyed to prospective purchasers. The property was purchased by My Montecito Inc., SH (My Montecito) and My Montecito currently holds the title for the property.

### IDENTIFICATION OF DISCHARGERS

3. For purposes of this Order, and pursuant to Water Code section 13304, RPMS; United; Rapid Gas; My Montecito Inc., SH and CF PropCo, have been identified as the Dischargers.
  - a. Water Code section 13304, subd. (a), provides, in part, that:

"A person who has discharged or discharges waste into the waters of the state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts."
  - b. United, Rapid Gas and RPMS are being named as Responsible Parties because, as provided by additional findings herein, they or their predecessors owned and operated leaky UST systems that have been identified as the source of the hydrocarbon pollutants beneath the 6020 and 6160 Arlington Avenue properties, as well as the surrounding and downgradient Site vicinity.
  - c. My Montecito Inc., SH, is named a Discharger because as the current land-owner, it possesses legal control of the 6160 Arlington Ave, which now encompasses the 6050 Arlington Avenue parcel formerly occupied by the E-Z Serve station. Pollutants remain on the property, which constitute a continuing and/or threatened discharge of waste; thus, subjecting My Montecito to liability under Water Code section 13304. Furthermore, My Montecito's unwillingness to cooperate by providing reasonable access since acquiring the property more than two years ago has not only prevented the other parties from conducting further subsurface assessment, environmental testing and groundwater plume monitoring, but has delayed implementation of the corrective action activities needed to remediate source areas beneath the former E-Z Serve property.

- d. CF PropCo is being named a Discharger because the corporation has owned the 6020 Arlington Avenue property for more than a brief period of time, during which on-site business activities associated with ongoing retail fueling activities may or may not have contributed to, or exacerbated contamination associated with United and/or Rapid Gas' former fueling operations. Even if conditions have not been exacerbated, CF PropCo is the current fee title holder with legal control of the 6020 Arlington Avenue parcel, and is thus subject to liability under Water Code section 13304 for the continuing and/or threatened discharge of pollutants. J and R Wong and 6160 Arlington Ave., LLC, are not being named as Dischargers because they are not current owners of any of the subject properties, they cooperated with investigation and cleanup work conducted by others during their period of ownership, and there is currently no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent or in the downgradient Site vicinity are the result of releases or discharges stemming from business activities conducted on the shopping center property during the time when it was controlled by J and R Wong or 6160 Arlington Ave., LLC entities.
- e. As provided herein, based on Site investigations and test results included in the Regional Board's case files, the Regional Board has determined that the subsurface contamination identified at the Site originated from historical leaks of petroleum hydrocarbon-related chemicals that occurred as a result of operations formerly conducted at both the United and/or Rapid Gas and E-Z Serve gasoline stations described herein.
- f. This Cleanup and Abatement Order is being issued to **all** of the Dischargers to make them jointly and severally liable for the investigation and cleanup activities associated with the commingled releases stemming from the Site.
- g. United, Rapid Gas, and CF PropCo argue against joint and several liability and contend that responsibility for remediating the Site should be apportioned between the parties in relation to the discharges from each parcel. As explained below, the discharges from each property are sufficiently commingled to justify imposing joint and several liability for investigating and remediating the Site. Further, a comprehensive remedial response is necessary to mitigate the full extent of the contamination and provides the best path for completing remediation of the Site.

#### SITE BACKGROUND

#### 4. Unauthorized Discharge of Waste - 6020 Arlington Avenue, Riverside, CA:

- a. In 1992, one 550-gallon steel waste oil UST was removed from the United and/or Rapid Gas facility and was not replaced. A total of three soil samples were collected from the tank pit to characterize subsurface conditions. The samples contained total recoverable petroleum hydrocarbons (TRPH) at concentrations ranging from 23 milligrams per kilograms (mg/kg) to 950 mg/kg, but benzene, toluene, ethyl benzene and xylenes (BTEX) and halogenated organics were not reported above detection levels.
- b. Preliminary subsurface investigations were completed to characterize the extent of

hydrocarbons beneath the facility in October 1998. Soil borings and groundwater monitoring wells completed in all three corners of the property exhibited hydrocarbon impacts. The most significant soil impacts were encountered in MW-1, installed northwest of operating USTs, where TPH-G and BTEX were detected at 10,300 mg/kg, and 42 mg/kg, 269 mg/kg, 155 mg/kg and 1,050 mg/kg, respectively. MtBE was also reported as high as 9.5 mg/kg at this location. Groundwater samples from the three monitoring wells were heavily-impacted with TPH-G concentrations ranging from 73,800 micrograms per liter [ $\mu\text{g/L}$ ] to 103,000  $\mu\text{g/L}$  and BTEX as high as 22,500  $\mu\text{g/L}$ , 26,700  $\mu\text{g/L}$ , 2,330  $\mu\text{g/L}$  and 14,300  $\mu\text{g/L}$ , respectively, but also contained moderate concentrations of MtBE, (613  $\mu\text{g/L}$ ) and other petroleum-related compounds. Based on the data generated from these perimeter points, the hydrocarbon impacts were widespread and extended beyond property boundaries.

- c. Between December 1999 and July 2000, additional phases of assessment were completed to characterize the extent of groundwater impacts north, west, east and southeast of the 6020 Arlington Avenue service station property. Elevated TPH-G and BTEX, and to a lesser degree MtBE and tertiary butyl alcohol (TBA), were observed in groundwater samples collected from wells east of the service station (MW-6/8), as high as 19,300  $\mu\text{g/L}$ , 4,620  $\mu\text{g/L}$ , 146  $\mu\text{g/L}$  and 189  $\mu\text{g/L}$ , respectively. Significant groundwater impacts were also observed in MW-7, installed on the shopping center west of the United and/or Rapid Gas station, where TPH-G and BTEX were reported at 33,000  $\mu\text{g/L}$ , 1,850  $\mu\text{g/L}$ , 7,630  $\mu\text{g/L}$  and 1,430  $\mu\text{g/L}$  and 6,600  $\mu\text{g/L}$ , respectively. Based on these results, additional characterization was needed to delineate dissolved-phase hydrocarbon contamination extending to the west, east and southeast. The presence of hydrocarbon impacts in shallow vadose zone soil collected from MW-7 at 5 feet and 10 feet bgs (above the water table), in tandem with the elevated dissolved-phase impacts observed in the corresponding well, also provided evidence to suggest a potential source originating from the shopping center property that would later be attributed to the E-Z Serve station that operated there more than a decade earlier.
- d. Additional soil testing was conducted in November and December 2002, when the USTs and product delivery piping were removed and replaced in conjunction with station upgrades. Soil samples from the northern UST excavation, as well as those collected beneath both dispensers, revealed elevated concentrations of gasoline-related hydrocarbons and fuel oxygenates, including total petroleum hydrocarbons as gasoline (TPH-G), BTEX, methyl tert butyl ether (MtBE) and lead, while samples collected in the southern tank cavity contained only low or non-detect TPH-G and BTEX, but exhibited elevated levels of MtBE. The widespread distribution of hydrocarbon impacts, and presence of significant lead and MtBE impacts observed in soil, suggested an operational history that likely included at least two separate unauthorized releases. Impacted soil was removed to the degree practical, but contaminant concentrations were observed to be increasing with depth and inaccessible due to site constraints imposed by the adjacent sidewalks, streets and right-of-ways. Approximately 1,100 tons of hydrocarbon-impacted soil were removed and transported off-site for disposal.
- e. From December 2001 through September 2006, fourteen additional groundwater wells were completed to further characterize the distribution of petroleum hydrocarbon north and east of the 6020 Arlington Avenue property and in the

residential areas located to the southeast along San Vicente and Brunswick Avenue, as well as northwest and southwest of the property in Arlington Avenue and Adams Street, respectively. Peripheral monitoring points MW-11, MW-12, MW-13 and MW-18, situated 550 feet east, 600 feet southeast, 175 feet northwest, and 425 feet southeast of the service station, respectively, were non-detect for petroleum hydrocarbon constituents. However, groundwater samples collected from MW-14, located 175 feet west of the facility, were heavily-impacted with TPH-G and BTEX concentrations reported at 120,000 µg/L and 1,900 µg/L, 38,000 µg/L, 3,300 µg/L, and 17,600 µg/L, respectively. Wells MW-15 and MW-16, installed 125 feet and 255 feet south of the service station, also exhibited elevated TPH-G and BTEX as high as 160,000 µg/L and 33,000 µg/L, 5,700 µg/L, 3,400 µg/L and 16,600 µg/L, respectively. Well MW-17, installed south of the United and/or Rapid Gas facility in the residential neighborhood along San Vicente Avenue, exhibited TPH-G and BTEX impacts, but also contained MtBE (1,400 µg/L). Based on these findings, dissolved-phase hydrocarbons and fuel oxygenates had migrated a significant distance downgradient of the 6020 Arlington Avenue service station property, extending beneath the adjacent Lube & Tune facility and residential properties situated along San Vicente. Groundwater impacts were not defined south, southeast and west of the United and/or Rapid Gas facility.

- f. Subsequent sampling of monitoring wells MW-14 through MW-16 indicated that the chemical properties and make-up of hydrocarbon constituents in groundwater were generally characterized by very high BTEX concentrations and much lower or non-detect levels of fuel oxygenates, such as MtBE and tertiary butyl alcohol (TBA). Accompanied by a predominantly south or southeasterly groundwater flow and gradient, the data provided further evidence of a contributing source stemming from the shopping center property located west of the service station. Hydrocarbon impacts reported in upgradient well MW-5 also pointed to a third potential source originating from the former Shell station that once operated north of Arlington Avenue. However, test data collected since that time generally revealed limited residual hydrocarbon impacts to soil and groundwater beneath the former Shell station, which suggested that the former Shell operations were not a significant contributor to the widespread contamination in the surrounding area.<sup>1</sup>
- g. In July 2009, liquid-phase hydrocarbons (LPH) or gasoline free product was observed for the first time in wells MW-15 through MW-17, situated south of the service station in Adams Avenue, at thicknesses ranging from 0.30 feet to 0.70 feet. Subsequent groundwater monitoring indicated that the presence of widespread LPH appeared to be attributed to an overall decline in groundwater elevations (nearly 10 feet to date), which was allowing product trapped in subsurface strata below the water table to drain from soil pore space and collect in monitoring wells. As a result of these water level changes, free product was reported in an increasingly larger number of the on-site and off-site wells installed during earlier phases of site characterization.
- h. In February 2010, forensic analysis was completed on free product samples collected from monitoring wells MW-2, MW-7 and MW-16, located on both service station

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<sup>1</sup> Based on information currently available, the release(s) from the former Shell station have not commingled with the plume subject to this Cleanup and Abatement Order.

properties, and along Adams Avenue, respectively, to determine whether there was any distinguishable difference in the free product being observed east and west of Adams Avenue, and thereby differentiate what originated from each of the two adjacent sites. The forensic study confirmed that the gasoline free product was attributed to at least two distinct releases. While all three of the product samples were characterized as weathered/degraded gasoline with lead additives, the product collected from MW-2 could be distinguished from the LPH observed in MW-7 based on the relative amount and combination of alkyl lead compounds and other key markers in the chemical make-up of gasoline-range organics and the product sample collected from MW-16 appeared to most closely resemble the composition and formulation exhibited by free product from MW-7. As a result, free product observed in MW-7 and MW-16 appeared to be primarily attributed to the former E-Z Serve station located west of Adams Avenue. Based on these findings, Regional Board staff instructed United to initiate free product recovery from on-site and off-site wells east of Adams Avenue, including MW-2, MW-6, MW-17, MW-19 and MW-20.

- i. From June 2005 through September 2011, soil vapor extraction was conducted to remediate source area soils beneath the 6020 Arlington Avenue service station property and downgradient Lube & Tune facility located at 6000 Arlington Avenue. Between April 2006 and December 2009, air-sparging was also performed to volatilize dissolved-phase hydrocarbons into the vapor phase, where they could be recovered and destroyed by the operating vapor extraction system. Air-sparging was later terminated in December 2009, when the presence of LPH or gasoline free product raised a safety concern about conducting the activities in close proximity to residences. Soil vapor extraction continued through September 2011, in order to provide ongoing source removal and vapor abatement proximate to the residences, but these efforts were also terminated when they were determined to be under-scaled in comparison to the magnitude and widespread distribution of hydrocarbon contamination exposed by the receding water table. Approximately 44,135 pounds of hydrocarbons were reportedly removed as a result of this corrective action effort.
- j. The majority of site assessment and remediation activities described above were funded with reimbursement monies provided by the State's Underground Storage Tank Cleanup Fund (USTCF) under Claim No. 13675, up to the total eligible limit of \$1.5 million dollars allowed by law. Subsequent phases of site investigation and interim corrective action conducted jointly by Rapid Gas and RPMS, between 2011 and April 2015 (discussed later in this Order), were also funded with state reimbursement monies, to the sum of an additional \$1.5 million dollars (\$3 million total), under the USTCF Commingled Plume Account.

**5. Unauthorized Discharge of Waste - 6160 Arlington Avenue:**

- a. As indicated, E-Z Serve's fueling operations and release history were revealed when MW-7 was installed on the shopping center property located across Adams Avenue, to characterize groundwater impacts west of 6020 Arlington Avenue service station. Soil data collected during the investigation revealed elevated TPH-G and BTEX in the vadose zone above the water table and very high dissolved-phase hydrocarbon impacts to underlying groundwater, which suggested the presence of a source stemming from the property itself rather than being the result of contaminant transport via groundwater from the gas station facility across the street.

June 10, 2016

- b. According to records obtained from County fire and health departments, the eastern-most portion of the present-day shopping center was formerly occupied by a service station that operated at the historic street address of 6050 Arlington Avenue. The registered owner of the USTs was E-Z Serve of California, Inc. The USTs were removed in October 1986 and soil samples collected from the fuel tank excavation showed moderate TPH-G and BTEX impacts. Based on the prevailing cleanup standards at the time, no further assessment or corrective action was requested by oversight personnel and the property was redeveloped into the commercial shopping center and it continues to operate as a shopping center.
- c. On March 25, 2004, Regional Board staff sent correspondence to RPMS to inform it of the soil and groundwater data generated by United and/or Rapid Gas's off-site investigation on the shopping center property. RPMS was identified as the Responsible Party for the hydrocarbon contamination beneath the parcel and was instructed to initiate corrective action pursuant to California Code of Regulations, Title 23. Staff correspondence requested that a site assessment work plan and time schedule for completion of the requested activities be submitted no later than April 30, 2004. Regional Board staff received no response from RPMS representatives.
- d. Additional Regional Board letters were sent to RPMS on July 28, 2004 and August 3, 2005, to reiterate previous requests that RPMS initiate corrective action in accordance with California Code of Regulations, Title 23, and complete the subsurface assessment necessary to investigate petroleum hydrocarbon contamination beneath the shopping center property. Again, Regional Board staff received no response from RPMS representatives.
- e. On January 12, 2006, Regional Board staff telephoned RPMS representatives and left a detailed message regarding the previous requests issued by staff. Board staff requested that RPMS contact Regional Board staff to discuss these outstanding regulatory requirements and compliance deadlines. On January 13, 2006, the President of RPMS, Mr. Jack Ceccarelli, contacted Board staff to discuss site matters. While aware of staff's requests, he stated that the 6050 Arlington Avenue property was not included in the portfolio of California service station properties for which his corporation accepted environmental liability and responsibility. Furthermore, he claimed that RPMS had no assets or financial resources to allocate to corrective action efforts at the property. As a result, RPMS would rely upon state funding to cover the cleanup costs and would need to confirm claim eligibility under the State's USTCF before proceeding with any of the requested testing.
- f. On February 28, 2006 and March 23, 2006, Regional Board staff telephoned Mr. Ceccarelli, and left additional messages indicating that RPMS was being asked to proceed with the necessary subsurface investigations without further delay. Staff insisted that the assessment work be completed concurrent with RPMS's pursuit of a USTCF claim, as eligibility was not guaranteed and the testing would be necessary regardless. Additionally, since RPMS's failure to comply with staff requests constituted non-compliance, its failure to act could ultimately jeopardize its eligibility determination. Regional Board staff requested that RPMS representatives contact Regional Board staff to discuss the matter further, but received no response from RPMS.

- g. On March 28, 2006, Regional Board staff issued a notice of violation to RPMS for its failure to submit a work plan as requested by Regional Board correspondence dated March 2004, July 2004 and August 2005, and established a revised compliance deadline of April 28, 2006, for submission of the required site investigation work plan. The correspondence also reiterated previous communications that RPMS's failure to comply with Regional Board requests could jeopardize USTCF eligibility.
- h. On January 2, 2009, Regional Board staff received a work plan for the subsurface investigation that had originally been requested nearly five years earlier. The scope was conditionally approved on February 18, 2009, which established a compliance deadline for submission of the investigation results by no later than the end of the 2<sup>nd</sup> Quarter 2009. Subsequent extensions granted by Regional Board staff in order to provide additional time needed to secure access agreements, obtain permits, and compile the test data, resulted in a revised compliance deadline of August 31, 2009.
- i. Preliminary site investigations were initiated to investigate leaks and/or spills associated with the former E-Z Serve station in July 2009. Between February 2010 and January 2011, additional phases of assessments were completed to further characterize hydrocarbon impacts in source areas corresponding to E-Z Serve's tank system (e.g. USTs and dispenser islands) and delineate the extent of groundwater impacts downgradient of the property.

Soil and groundwater results from source area monitoring wells EZ-1 through EZ-3 revealed widespread contamination beneath the property. Elevated TPH-G and BTEX concentrations were reported in soil samples collected at all three locations, at concentrations as high as 5,640 mg/kg, and 27 mg/kg, 251 mg/kg, 107 mg/kg and 734 mg/kg, respectively. Groundwater data from EZ-1 and EZ-2, installed proximate to the former tank cavity and northern dispenser island respectively, also revealed very high-dissolved-phase TPH-G and BTEX, at maximum concentrations of 190,000 µg/L and 32,000 µg/L, 31,500 µg/L, 3,360 µg/L and 17,000 µg/L, respectively. Groundwater was not collected from EZ-3, due the presence of free product, which was measured at a thickness of approximately 2 feet.

Water quality data from wells installed in the surrounding area indicated that the groundwater impacts extended beneath the public right-of-ways located south and southeast of the former E-Z Serve property. Gasoline free product was encountered in well EZ-4, located south of the property in Colorado Avenue. While LPH/free product was not initially observed in EZ-5 or EZ-6, situated southeast of the E-Z Serve station, groundwater samples collected from these wells were heavily-impacted with TPH-G and BTEX, at concentrations as high as of 145,000 µg/L, and 18,600 µg/L, 18,100 µg/L, 5,310 µg/L and 30,000 µg/L, respectively. TBA was also detected in EZ-5 at 1,090 µg/L. Since the TBA reported in EZ-5 was most likely attributed to more modern-day fueling operations, the data suggested that groundwater impacts stemming from the E-Z Serve release had migrated off-site and commingled with contamination emanating from the United and/or Rapid Gas station. Groundwater data collected from downgradient wells EZ-7, EZ-8 and EZ-9 also indicated that hydrocarbon-impacted groundwater had migrated beneath an elementary school property and private residences located south of Colorado Avenue, and extended more than 600 feet south and southeast along Adams Avenue.

- j. As discussed, shortly after the investigations above commenced, free product began to be reported in an increasingly larger number of the groundwater wells along Adams and Colorado Avenue. Based on quarterly monitoring data and preliminary forensic analysis of product samples collected from both service station properties, and the adjoining street, Regional Board staff instructed RPMS to initiate interim free product recovery from wells situated along the west side of Adams Avenue and source area wells on the 6160 Arlington Avenue shopping center property (former E-Z Serve station footprint).
- k. Site characterization conducted to investigate the E-Z Serve release and described above, was funded, largely if not entirely, with state reimbursement monies awarded by the USTCF's Commingled Plume Account claim CP0050.

**6. Commingled Plume Determination (6020/6160 Arlington Avenue):**

- a. In June 2011, the contaminant plumes stemming from the 6020 and 6160 Arlington Avenue parcels were determined eligible for reimbursement of cleanup costs under the State USTCF's Commingled Plume Account. This allowed for an additional \$1.5 million dollars, above and beyond the State funds already paid for United and/or Rapid Gas's cleanup efforts, to be allocated jointly for the cooperative cleanup of both releases. Site investigation and corrective action conducted jointly through 2014 were thus funded with State monies, up to the total allowable sum of \$3 million dollars (combined).
- b. Between September 2011 and January 2014, additional investigations were conducted to characterize hydrocarbon impacts proximate to E-Z Serve source areas and delineate the downgradient extent of dissolved-phase and LPH contamination along Adams Avenue and east of Adams Avenue adjacent to residences fronting Arlington Avenue, San Vicente Avenue and Brunswick Avenue. Wells EZ-12 through EZ-14 contained TPH-G and BTEX at maximum concentrations of 299,000 µg/L and 23,000 µg/L, 31,000 µg/L, 4,900 µg/L and 28,000 µg/L, respectively. Groundwater samples from EZ-15 through EZ-17 also showed elevated concentrations of TPH-G and BTEX, as well as TBA up to 970 µg/L. Subsequent monitoring has revealed persistent free product at all six locations. Well MW-21, installed 325 feet to the southeast in San Vicente Avenue, contained moderate levels of TPH-G, BTEX, MtBE and TBA, while MW-22, installed farther southeast along Brunswick Avenue, contained lower-level TPH-G and trace levels of ethyl benzene and xylenes, but was non-detect for MtBE and TBA. Trace benzene (1.0 µg/L) and naphthalene (3.5 µg/L) were reported in MW-23, but TPH-G and fuel oxygenates MtBE and TBA were not detected. Based on these investigations, dissolved-phase impacts appeared to attenuate to lower levels at a distance approximately 600 feet southeast of source areas, but the full extent of groundwater contamination in the westerly direction was still unknown. This data gap persists to present-day.
- c. Interim corrective action was initiated to recover free-phase gasoline product from Site monitoring wells located on and downgradient of both the service station properties in March 2010. LPH recovery has been completed on a routine basis, using a combination of removal methods including manual bailing (through June 2012), vacuum-truck liquid extraction (July 2012 to July 2014), and most recently by passive and/or automated collection skimmers (November 2014 to at least January

2015). During the Fourth Quarter of 2014, product was removed from Site wells located on the United and/or Rapid Gas and Lube & Tune properties, as well as select downgradient wells situated along Adams and San Vicente Avenues, via product skimmers that were generally emptied on a weekly basis. LPH recovery is not being conducted on the shopping center property (inclusive of E-Z Serve station footprint), due to the landowner's refusal to grant access.

- d. Between August 2010 and September 2011, mobile high-vacuum dual-phase extraction (HVDPE) was performed to mitigate hydrocarbon-impacted soil and groundwater beneath the former E-Z Serve station footprint. This extraction effort reportedly removed an estimated 97,774 pounds (or 15,579 gallons) of hydrocarbon mass from subsurface soils and recovered approximately 287,990 gallons of contaminated groundwater for treatment and discharge to the sanitary sewer. Despite the extraordinary volume of hydrocarbon mass removed during the 12-month period, remediation system data collected at the conclusion of the extraction activities indicated that soil vapor and groundwater beneath the property remained heavily-impacted. This corrective action was terminated so that the temporary system could be removed to provide clearance for dedicated remediation equipment and piping components needed to expand the remedial response site-wide. However, the upgraded remediation infrastructure was never installed, due to the property owner's refusal to grant reasonable access since acquiring the property in April 2013.
- e. In May 2013, interim HVDPE was initiated to mitigate hydrocarbon-impacted soil and groundwater beneath the United and/or Rapid Gas facility and immediately downgradient of the Lube & Tune facility. Extraction was focused on a subset of the most impacted Site wells, generally limited to those containing significant measurable free product. As a result of these measures, an estimated total of 170,271 pounds of hydrocarbon mass was removed from subsurface soils and more than 436,270 gallons of contaminated groundwater were recovered for treatment and discharged to the sanitary sewer. Including the initial corrective action efforts (e.g. vapor extraction/air-sparging) performed between February 2012 and January 2013, the cumulative hydrocarbon mass removed from beneath the facility and immediate vicinity to date has been estimated at nearly 178,950 pounds. Despite the substantial volume recovered during the most recent 20 months of operation (through December 2014), remediation data collected just prior to shutdown indicated that soil and groundwater beneath the 6000 and 6020 Arlington Avenue parcels remained heavily-impacted. A fixed-based vapor extraction unit was recently re-installed. The upgraded system utilizes the existing vapor extraction well network and piping manifold to perform vadose zone remediation of hydrocarbon-impacted soils beneath the 6020 Arlington Avenue property and adjacent 6000 Arlington Avenue parcel. To date, no comprehensive corrective action response for remediation of contaminated groundwater has been proposed and counsel for Rapid Gas has suggested that any such effort be delayed/postponed indefinitely, pending its effort to remove free product from Site wells and cost-sharing/allocation of resources by the other Responsible Parties.
- f. The scope of corrective action measures employed (individually and jointly) to mitigate Site releases has proven to be piecemeal and significantly under-scaled when considered in relation to (1) the magnitude and extent of hydrocarbon contamination shown to be present, and (2) proximity of overlying commercial

structures and nearby sensitive receptors, including the elementary school and private residences. Current conditions warrant a **comprehensive remedial response**, designed to mitigate the full expanse of Site contamination located beneath both service station footprints, as well as the adjacent streets, public right-of-ways and surrounding properties.

7. **Water Quality Standards:** The Site overlies the Arlington Groundwater Management Zone (801.26), which has been designated for beneficial uses that include: (1) Municipal and domestic supply (MUN), (2) Agricultural supply (AGR), (3) Industrial service supply (IND) and (4) Industrial process supply (PROC).

The Santa Ana Regional Water Quality Control Board's Water Quality Control Plan (Basin Plan) establishes water quality objectives (WQOs)<sup>2</sup> for chemical constituents, to help ensure the protection of groundwater resources in accordance with designated beneficial uses. The Basin Plan further states, "All waters of the region shall be maintained free of substances in concentrations which are toxic, or that produce detrimental physiological responses in human, plant, animal or aquatic life." The primary maximum contaminant levels (MCLs)<sup>3</sup> established by the California Department of Health Services in Title 22 of the California Code of Regulations are considered protective of the most sensitive beneficial use (e.g. MUN). As a result of Site releases discussed herein, groundwater in the vicinity has been significantly impacted and impaired by petroleum hydrocarbon compounds, including but not limited to BTEX, as well as fuel oxygenates MtBE and TBA, at concentrations which are not consistent with the levels of water quality needed to support beneficial use designations established in the Basin Plan.

- a. In October 2014, a subset of the Site monitoring wells were gauged and sampled to determine current site conditions. Gasoline free product was reported in nineteen of the monitoring points, at thicknesses up to 2.07 feet. It should also be noted that wells located on the former E-Z Serve property, many of which historically contained the most significant amounts of product, could not be inspected due to ongoing access issues. A review of current and historical plume monitoring data indicates that the commingled LPH gasoline plume extends as far north as Site wells MW-1R and MW-14, as far west as EZ-11, EZ-17 and EZ-18, to the east as far as MW-10 and downgradient of the site to the south and southeast as far as EZ-6, EZ-9 and MW-17. The extent of the contamination to the west remains unknown. Based on data generated from peripheral Site wells, the extent of dissolved-phase hydrocarbon impacts encompasses an even larger area that extends in nearly all directions, but which has not yet been adequately delineated.
- b. The table below shows the maximum contaminant concentrations of the most

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<sup>2</sup> "Water quality objectives" are defined in Water Code section 13050(h) as "the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses of water or the prevention of nuisance within a specific area."

<sup>3</sup> MCLs, maximum contaminant levels, are public health-protective drinking water standards to be met by public water systems. MCLs take into account not only chemicals' health risks but also factors such as their delectability and treatability, as well as the costs of treatment. Primary MCLs can be found in California Code of Regulations, Title 22, sections 64431 - 64444. Secondary MCLs address the taste, odor, or appearance of drinking water, and are found in California Code of Regulations, Title 22, section 64449.

prevalent petroleum hydrocarbon constituents reported in monitoring wells where LPH was not present and groundwater samples were collected and quantified for dissolved-phase hydrocarbon constituents during the October 2014 monitoring and sampling event, accompanied by WQOs for each of these respective chemicals.

Constituent	Maximum Concentration (µg/L)	Water Quality Objectives (µg/L)
TPH as gasoline (TPH-G)	137,000	5 <sup>1</sup>
Benzene	7,800	1 <sup>2</sup>
Toluene	21,000	40 <sup>3</sup>
Ethyl benzene	8,300	30 <sup>3</sup>
Xylenes	59,000	20 <sup>3</sup>
Methyl Tertiary Butyl Ether (MtBE)	430	5 <sup>4</sup>
Tertiary butyl alcohol (TBA)	4,100	12 <sup>5</sup>

1- USEPA Health Advisory 2- California Primary MCL 3- USEPA Secondary MCL 4- California Secondary MCL  
 5 - California State Notification Level and Response Level for Drinking Water.

- c. The above impacts to groundwater at, beneath, and emanating from the Site represent a significant impairment of groundwater resources and do not conform to the levels of water quality needed to support current and/or future uses of the groundwater resource, thereby creating a condition of pollution and nuisance in waters of the State, as defined by Water Code sections 13050(l) and (m).

**8. Potential Human Health Exposure Risk:** Based on the magnitude and widespread distribution of soil and groundwater contamination and presence of gasoline free product/LPH present beneath the Site and off-Site contaminant migration of elevated dissolved-phase and LPH beneath adjacent residences and school property, the Site contamination may pose a human health risk to surface occupants of existing on-Site buildings, and adjacent or downgradient structures and residences overlying the Site plume, as a result of volatilization of contaminant vapors into the indoor air.

- a. Several phases of soil gas testing have been performed to evaluate the potential human health exposure risk posed to occupants and patrons of the commercial shopping center situated over the former E-Z Serve footprint (6050 Arlington Property), and residences located east and west of Adams Avenue, at 8310 Colorado Avenue and 4580 Adams Avenue, as well as 8293, 8294 and 8283 San Vicente Avenue. Vapor samples collected from 5-foot and 10-foot probes on the former E-Z Serve station exceeded the commercial California Human Health Screening Levels (CHHSL) of 0.28 µg/L, with benzene concentrations reported as high as 12.0 µg/L. Soil gas samples collected in Colorado Avenue revealed elevated

benzene and ethyl benzene at the 20-foot depth, but were non-detect at shallower depth intervals. Vapor samples collected from probes fronting residences along San Vicente Avenue revealed very high benzene, ethyl benzene and/or naphthalene concentrations at the 10-foot, 15-foot and 20-foot depth intervals, which were generally accompanied by lower or non-detect hydrocarbon concentrations in the corresponding samples collected at 5 feet bgs. However, benzene and/or ethyl benzene were reported at levels above the residential CHHSLs of .085 µg/L and 1.10 µg/L, in 5-foot samples collected at several locations. Benzene and ethyl benzene were reported at 0.56 µg/L and 5.38 µg/L in VP-8, fronting the 8283 San Vicente Avenue address. Additionally, benzene and ethyl benzene were detected at concentrations as high as 3.84 µg/L and 21.68 µg/L, respectively, in 5-foot soil gas samples collected from VP-9 and VP-10, located on the 8293 San Vicente Avenue residence. Subsequent soil gas testing performed at these locations along San Vicente Avenue resulted in conflicting data that showed low or non-detect levels in the shallow subsurface, which raised concerns about sample variability that prevented any definitive conclusions from being drawn regarding the actual threat to residents.

- b. Based on the above soil gas testing, Site contamination in unmitigated source areas associated with the former E-Z Serve station footprint may pose an imminent vapor intrusion risk to occupants of the overlying commercial businesses in the eastern portion of the shopping center property. Shallow soil vapor samples collected from three locations along San Vicente Avenue suggest that hydrocarbon vapors volatilizing upward from the heavily-impacted water table below cannot yet be ruled out as a potential human health exposure concern for residents overlying high dissolved-phase hydrocarbon and/or gasoline free product plumes. It should also be noted that no soil gas testing has been conducted to evaluate the potential human health exposure risk to the workers of the operating gasoline service station (Low Threat Cleanup Policy exemption) or the adjacent Lube & Tune repair facility. The contrasting data generated from soil vapor test performed to date represent an unacceptable uncertainty regarding the risk posed by Site contamination. As such, routine soil gas testing must be conducted to determine the long-term risk posed by Site contamination and ensure public safety.

## LEGAL AND REGULATORY AUTHORITY

9. This Order conforms to and implements (1) policies and requirements of the Porter-Cologne Water Quality Control Act (Division 7, commencing with Water Code section 13000), including sections 13267 and 13304; (2) applicable provisions of Statewide Water Quality Control Plans adopted by the State Water Resources Control Board (State Board) and the *Water Quality Control Plan, Santa Ana River Basin* (Basin Plan) adopted by the Regional Board including beneficial uses, water quality objectives, and implementation plans; (3) State Board policies and regulations, including State Board Resolution No. 68-16 (*Statement of Policy with Respect to Maintaining High Quality of Waters in California*), Resolution No. 88-63 (*Sources of Drinking Water*), and Resolution No. 92-49 (*Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under California Water Code Section 13304*); and (4) relevant standards, criteria, and advisories adopted by other State and federal agencies.

**10. Basis for Cleanup and Abatement Order:** Based on the findings above, the Dischargers are subject to this Order because they have caused or permitted waste to be discharged or deposited where it has discharged to waters of the state and created a condition of pollution or nuisance. As such, the Regional Board is authorized to order RPMS; United and affiliate Rapid Gas; My Montecito Inc., SH and CF PropCo, to cleanup and abate the effects of the discharges pursuant to Water Code section 13304.

**11. Need and Basis for Requiring Technical Reports:** Water Code section 13267 provides that the Regional Board may require dischargers, past dischargers, or suspected dischargers to furnish those technical or monitoring reports as the Regional Board may specify, provided that the burden, including costs, of these reports, shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring the reports, the Regional Board must provide the person with a written explanation with regard to the need for the reports, and identify the evidence that supports requiring that person to provide the reports. The technical reports required by this Order are needed to provide information to the Regional Board regarding (a) the nature and extent of unauthorized releases, (b) degree of pollution and nuisance caused to State waters, and (c) the threat Site contamination may pose to members of the public who work or reside in structures overlying the contaminant plume. These reports will enable the Regional Board to determine the magnitude and distribution of contaminants on and in the vicinity of the Site, evaluate public safety, and ascertain what cleanup and abatement measures are required to bring the Site into compliance with applicable water quality objectives. Based on the nature and possible consequences of the discharges described in the findings above, the burden of providing the required reports bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.

Pursuant to California Code of Regulations, title 23, sections 3890-3895, responsible parties must submit electronic laboratory analytical data (i.e. soil, soil gas/vapor, or water chemical analyses) and locational data (i.e. longitude/latitude coordinates and surface elevation of site monitoring wells), and other data generated in conjunction with environmental cleanups, to the State Geotracker database. Additional information regarding requirements pertaining to the electronic submission of data can be found at <http://geotracker.waterboards.ca.gov>.

**12. Cost Recovery:** Pursuant to California Water Code section 13304, the Regional Board is entitled to, and will seek reimbursement for, all reasonable costs actually incurred by the Regional Board to investigate unauthorized discharges of waste and oversee cleanup of such waste, abatement of the effects thereof, or other action required by this Order.

**13. State Board Policies:** The State Board adopted Resolution No. 92-49, the *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304*. This Resolution sets forth the policies and procedures to be used during an investigation or cleanup of a nuisance and requires that cleanup levels be consistent with State Board Resolution No. 68-16, the *Statement of Policy with Respect to Maintaining High Quality of Waters in California*. Resolution No. 92-49 and the Basin Plan establish the cleanup levels to be achieved. Resolution No. 92-49 requires the waste to be cleaned up to background, or if that is not reasonable, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with California Code of Regulations, Title 23, section 2550.4. Any alternative cleanup level greater than background must (1) be consistent with the

maximum benefit for the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Board.

**14. California Environmental Quality Act (CEQA) Compliance:** The issuance of this Order is an enforcement action taken by a regulatory agency and is categorically exempt from the provisions of CEQA pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. Implementation of the required testing, assessment, monitoring and corrective action activities outlined by this Order are considered to be minor actions performed to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous wastes and substances, and therefore generally be exempt pursuant to California Code of Regulations, Title 14, section 15330. Nevertheless, the exact scope of activities required by this Order has not yet been fully determined and implementation of the corrective action efforts may ultimately result in significant physical impacts that require evaluation under CEQA. If the Regional Board determines that implementation of any plan required by this Cleanup and Abatement Order will have a significant effect on the environment, the Regional Board will conduct the necessary and appropriate environmental review prior to the Executive Officer's approval of the applicable plan.

The Dischargers will bear the costs, including the Regional Board's costs, of determining whether implementation of any plan required by this Cleanup and Abatement Order will have a significant effect on the environment and, if so, in preparing and handling any documents necessary for environmental review. If necessary, the Dischargers and a consultant acceptable to the Regional Board shall enter into a memorandum of understanding with the Regional Board regarding such costs prior to undertaking any environmental review.

#### REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to Water Code sections 13267 and 13304, RPMS; United; Rapid Gas; My Montecito Inc., SH and CF PropCo shall cleanup and abate the Site in accordance with the scope and schedule set forth below.

1. **Site Access:** Within **30 days of adoption of this Order**, the Dischargers identified herein shall agree to reasonable terms for Site access by the other Dischargers or their authorized representatives, to any parcels or properties affected by Site contamination that are under their control, as necessary to conduct investigations and cleanup activities required by this Order. Additionally, the Dischargers shall continue to permit Site entry to their properties as needed to allow for unimpeded implementation of actions required by this Order, until such property access is no longer deemed necessary or warranted by the Executive Officer.
2. **Defining Contaminant Plume:** Submit a work plan and proposed schedule, within **90 days of adoption of this Order**, for conducting groundwater investigations to fully delineate the lateral and vertical boundaries of the groundwater contaminant plume. The work plan shall be subject to the approval of the Executive Officer. After approval of the work plan, conduct all field work necessary to define the extent of the groundwater contaminant plume, as

directed by the Executive Officer, until the extent of the plume is fully delineated.

3. **Remedial Action Plan:** Based upon the results of item 2 above, the Dischargers shall prepare and submit a comprehensive remedial action plan (RAP), with a proposed time schedule, that is sufficiently-scaled in scope to abate the expanse of Site contamination attributed to both UST system releases, and meets basic project objectives to mitigate source-area soil and groundwater contamination beneath the respective Site parcels and remediate the commingled groundwater plume consisting of both LPH and dissolved-phase impacts, such that further off-site and downgradient migration of contaminants by groundwater transport is prevented. Upon Regional Board approval of the RAP, the Dischargers shall implement the comprehensive RAP in accordance with the time schedule approved by the Executive Officer.
4. **Quarterly Groundwater Monitoring and Reporting:** Perform ongoing quarterly groundwater monitoring and sampling necessary to characterize site conditions and gauge the effectiveness of the corrective action measures with respect to both reduction of contaminant concentrations and plume containment. These activities shall initially include, but are not limited to, conducting monthly groundwater gauging and measuring of free product thicknesses in all Site wells, as well as semi-annual sampling and analysis of the dissolved-phase plume constituents in existing Site monitoring wells, but may in the future be conducted in accordance with a modified scope and schedule, if approved in writing by the Executive Officer.

For the following quarterly groundwater monitoring periods, submit the monitoring reports by the specified due date:

Groundwater Monitoring Period	Report Due Date
January to March	April 15
April to June	July 15
July to September	October 15
October to December	January 15

5. **Soil Gas Testing:** Within 30 days of adoption of this Order, submit a proposed scope and schedule for routine soil gas testing of existing vapor probes to provide an updateable survey of subsurface conditions over time and generate the necessary analytical data required to quantify the human health exposure risk posed by Site contaminants and evaluate the vapor intrusion threat to occupants of numerous residential and commercial structures overlying the Site contamination. In this proposal, include any new vapor probes you expect to install, when you expect to install them, and their location relative to the Site. Upon receiving approval from the Executive Officer, the program of routine soil gas testing shall be initiated within 60 days, and continuously implemented in accordance with the established schedule, until such time as the Site contamination has been demonstrated to be adequately mitigated to the degree that further testing is no longer deemed necessary or warranted, as determined by the Executive Officer.
6. **Quarterly Progress Reports:** Conduct the necessary ongoing remediation activities as described above and approved by the Executive Officer, and submit quarterly progress reports to the Executive Officer, regarding the Site remediation activities, groundwater plume monitoring data and soil gas test results generated in conjunction with items 2

through 5 (above) generated during the reporting period. The quarterly progress reports must include a detailed discussion regarding all testing and data collected during the period, and the relative effectiveness of the remediation efforts, along with recommendations for any additional assessment or testing needed to characterize or delineate Site contamination.

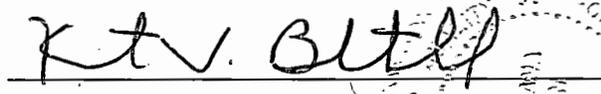
7. **If Revised RAP is Necessary:** In the event that the corrective action efforts are determined by the Executive Officer to be inadequate, the Dischargers shall submit a revised RAP within 60 days of being notified of such a determination, to propose a revised corrective action strategy capable of achieving the remedial objectives for remediation of contaminated soil, groundwater and/or abatement of soil vapor emissions for protection of human health, as set forth by the Executive Officer. Upon approval, the revised RAP shall be implemented in accordance with deadlines set forth by the Executive Officer.
8. **Qualified Professionals:** In accordance with California Business and Professions Code sections 6735, 7835, and 7835.1, all site investigations and corrective action activities required by this Order shall be performed by qualified professionals, that are licensed where applicable, and competent and proficient in the fields pertinent to the activities performed; and technical reports containing engineering and geologic evaluations and judgments, shall be prepared by, or under the direction of a registered professional engineer or geologist.
9. For purposes of this order, the Dischargers, or their authorized representative must certify under penalty of law, that they have examined and are familiar with the reports and, to the best of their knowledge, believe them to be true, complete and accurate. To this end, the following signed certification shall be included with all reports submitted pursuant to this Order:

*I certify under penalty of perjury under the laws of the State of California that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*
9. All references to the Executive Officer in this Order shall include his/her delegate.
10. Failure to comply with requirements of this Order may subject the Responsible Parties to further enforcement action, including but not limited to: imposition of administrative civil liability, pursuant to Water Code sections 13268 and 13350, in an amount not to exceed \$1,000 and \$5,000, respectively, for each day in which the violation occurs under Water Code sections 13304 or 13350, or the Regional Board may refer the matter to the Attorney General for injunctive relief or civil or criminal liability.
11. Any person affected by this action of the Regional Board may petition the State Board to review the action in accordance with section 13320 of the Water Code and California

June 10, 2016

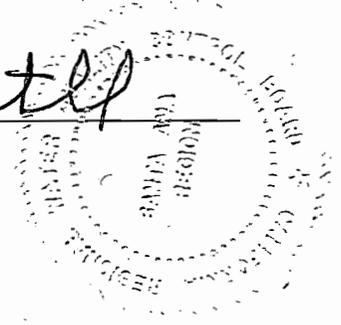
Code of Regulations, Title 23, section 2050. The petition must be received by the State Board, Office of Chief Counsel, (P.O. Box 100, Sacramento, California 95812), within 30 days of the date of this Order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

I, Kurt V. Berchtold, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Santa Ana Region, on June 10, 2016.



*K.V. Berchtold*

Kurt V. Berchtold  
Executive Officer



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Best, Best & Krieger  
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Snell & Wilmer, LLP  
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United El Segundo, Inc.,  
 Rapid Gas, Inc.  
 CF United PropCo, LL  
 c/o Mark B. Gilmartin, Esq.  
 1534 17<sup>th</sup> St., Ste. 103  
 Santa Monica, CA 90404-3452

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# ***FREY ENVIRONMENTAL, INC.***

---

*Environmental Geologists, Engineers, Assessors*  
2817 A Lafayette Avenue  
Newport Beach, CA 92663  
(949) 723-1645  
Fax: (949) 723-1854  
Email: [freync@freync.com](mailto:freync@freync.com)

November 4, 2015

Ms. Valerie Jahn-Bull  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3348

**ASSESSMENT OF PETROLEUM HYDROCARBON DISTRIBUTION  
IN GROUNDWATER  
FORMER RAPID GAS STATION #37 (RWQCB CASE NO. 083300039T)  
6020 ARLINGTON AVENUE  
FORMER EZ SERVE STATION (ARCO 1216) (RWQCB CASE NO. 083304005T)  
6050 ARLINGTON AVENUE  
RIVERSIDE, CALIFORNIA**

Dear Ms. Jahn-Bull,

This report prepared by FREY Environmental, Inc. (FREY) presents an assessment of the distribution of petroleum hydrocarbons in groundwater resulting from releases of gasoline at former Rapid Gas Station #37 located at 6020 Arlington Avenue in Riverside, California (“Rapid Site”) and former EZ Serve (ARCO 1216) located at 6050 Arlington Avenue in Riverside, California (“EZ Serve Site”) (Figures 1 and 2).

## **OBJECTIVE**

The objective of this assessment was to differentiate, to the extent feasible, the extent and distribution of impacted groundwater associated with the respective releases of gasoline from the Rapid Site and the EZ Serve Site. The assessment and conclusions are based on a review of historical subsurface investigative and corrective action reports prepared for the Rapid Site and the EZ Serve Site.

## BACKGROUND

Background information summarizing historical subsurface investigations and soil and groundwater remediation conducted at the Rapid Site is available on GeoTracker at [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0606500004](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0606500004). Background information summarizing historical subsurface investigations and soil and groundwater remediation conducted at the EZ Serve Site is available on GeoTracker at [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0606535975](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0606535975) and contained in the following documents:

- Atlas Environmental, Inc. (Atlas), 2011; *Dual Phase Extraction Pilot Test, Well Installation and Soil Gas Survey Work Plan, Rapid Gas Station #37, 6020 Arlington Avenue, Riverside, California*, dated April 30, 2011.
- FREY, 2015a; *Groundwater Monitoring Well Monitoring and Sampling and Quarterly Corrective Action Status Site Update – Second Quarter 2015, Rapid Gas #37, 6020 Arlington Avenue, Riverside, California*; dated August 31, 2015.
- FREY, 2015b; *Third Quarter 2015 Soil Vapor Extraction System Start-up and Free Product Recovery Report and Corrective Action Status Update, Rapid Gas #37, 6020 Arlington Avenue, Riverside, California*; dated October 22, 2015.
- GeoEnviro Services, Inc. (GESI), 2013; *Site Conceptual Model Update and Interim Remedial Action Plan Addendum, Commingled Plume CP0050, Rapid Gas #37 / Former EZ Serve (ARCO 1216), 6020 and 6050 Arlington Avenue, Riverside, California*, dated March 4, 2013.
- GESI, 2014; *Groundwater Monitoring and Sampling Report Fourth Quarter 2014, Commingled Plume CP0050, Rapid Gas #37 / Former EZ Serve (ARCO 1216), 6020 and 6050 Arlington Avenue, Riverside, California*, dated December 9, 2014.

## GEOLOGY AND HYDROGEOLOGY

The Rapid Site and EZ Serve Site are situated at an elevation of approximately 775 feet above mean sea level (msl) within the Santa Ana River floodplain which is approximately 1.5 miles north of the sites. The San Jacinto Mountains are approximately 3.9 miles south of the Site. Hole Lake is located approximately 1.5 miles west-northwest of the Sites. Pachappa Hill is located approximately 3.3 miles to the east-northeast of the Site and approximately 3.3 miles to the northeast of the Site is Mount Rubidoux (Atlas, 2011).

Based on borings logs generated during subsurface investigations, the stratigraphy at the sites generally consists of interbedded clayey silt, silt, silty sand and sand from just below the ground surface to varied depths that range from approximately 10 feet to 35 feet below ground surface (bgs), followed by decomposed granite to maximum depths explored of 46.5 feet bgs (Atlas, 2011).

It has also been reported that the alluvial materials beneath the sites extend from depths of 3 to 18.5 feet bgs, and are underlain by severely weathered to competent granitic rock to the total depth explored of 45 feet bgs (GESI, 2013).

Based on historic groundwater monitoring data, the depth to groundwater has ranged from approximately 19 to 32 feet bgs, with historical low groundwater levels observed during the most recent groundwater monitoring events. The groundwater flow direction in the site vicinity is generally to the southeast (FREY, 2015). The groundwater flow direction specific to each site is described in greater detail herein.

## **FORMER SOURCE AREAS**

### **RAPID SITE**

Based on soil samples collected and analyzed during removal of underground storage tanks (USTs) and dispensers in November 2002, petroleum hydrocarbons were detected in all soil samples beneath the former USTs and dispensers with the exception of the western dispensers on the northern fuel dispenser island (see Figure 3 for the current fuel system configuration). Note the former fuel system configuration was similar to the current configuration with the exception of an additional UST located just southeast of the southern fuel dispensers. Petroleum hydrocarbons, including MTBE, were detected in most of the soil samples. The highest concentrations of petroleum hydrocarbons were detected in soil samples collected and analyzed from beneath the USTs and the southern dispenser island (Atlas, 2002).

### **EZ SERVE SITE**

Soil samples collected beneath the former USTs at the EZ Serve Site following removal in October 1986 contained detectable TRPH. BTEX were detected at two soil samples locations within the fuel UST cavity at 2 feet below the bottom of the USTs, and in one of two soil samples, collected at the same locations, at 6 feet below the bottoms of the USTs. The soil samples were not analyzed for oxygenates (RCDH, 1986).

Based on the information reviewed by FREY, soil samples were not collected from beneath the former dispensers at the EZ Serve Site. Dispensers were located on the northern and eastern sides of the former EZ Serve Site (Figure 3). Based on historical soil boring logs and soil sample laboratory analytical data, it appears likely that releases occurred at both dispenser locations at the EZ Serve Site (GESI, 2013).

## **PETROLEUM HYDROCARBON DISTRIBUTION IN GROUNDWATER**

### **HISTORICAL GROUNDWATER FLOW DIRECTION**

The historical groundwater flow direction in the vicinity of the Rapid Gas Site and EZ Serve Site has historically been reported to be to the southeast. However, the groundwater flow direction across each site varies slightly based on historical groundwater elevation data. The groundwater flow direction across the Rapid Site is generally east-southeasterly, while the groundwater flow direction across the former EZ Serve Site is generally south-southeasterly, as shown on the Rose diagrams shown on Figures 4 and 5.

Also note that a southwesterly component to the groundwater flow occurs periodically at the EZ Serve Site in the vicinity of monitoring wells EZ-1, EZ-4, EZ-11 and EZ-17, as shown on several groundwater elevation maps in 2012 and 2013 when all four wells were monitored (Appendix A). Additionally, a northeasterly component to the groundwater flow direction occurs on the northeastern portion of the EZ Serve Site between monitoring wells EZ-2 and MW-14 (Appendix A).

### **PETROLEUM HYDROCARBONS ORIGINATING FROM THE RAPID SITE**

Based on the estimated groundwater flow direction for the Rapid Site and the historic groundwater sampling data set, groundwater on-site and off-site to the east-southeast of the Rapid Site was impacted by release(s) from the Rapid Site.

The extent of petroleum hydrocarbons in groundwater hydrogeologically downgradient from the Rapid Site has been adequately assessed by perimeter wells MW-11, MW-18, and MW-22 and (Appendices B & C).

### **PETROLEUM HYDROCARBONS ORIGINATING FROM THE EZ SERVE SITE**

Based on the estimated groundwater flow direction for the EZ Serve Site, and the historic groundwater sampling data set, groundwater on-site and off-site to the south-southeast of the EZ Serve Site was impacted by release(s) from the EZ Serve Site. These areas include Colorado Street south of the EZ Serve Site (monitoring wells EZ-4 and EZ-5), Adams Street (monitoring wells , EZ-12, MW-15, EZ-13, MW-16, EZ-14, EZ-6 and EZ-7), and the Adams Elementary School Property (well EZ-9). In addition, the northeastern component of groundwater flow in the northeastern portion of the Site between wells EZ-2 and MW-14 appears to have caused groundwater to be impacted in monitoring well MW-14. The extent of petroleum hydrocarbons in groundwater west of the former EZ Serve site has not been assessed (Appendices B and C).

## **FREE PRODUCT DISTRIBUTION**

### **RAPID SITE**

Free product has historically been present in several wells located on the Rapid Site and historically in off-site wells MW-19, MW-20 and RW-14 located hydrogeologically downgradient (east-southeast) of the Rapid Site at 6000 Arlington Avenue (Appendix D).

Free product present in off-Site areas located southwest and south of the Rapid Site in Adams Street were proven not to have originated from the Rapid Site, as discussed in the next section.

### **FORMER EZ SERVE SITE**

Free product has historically been present in several wells located on the EZ Serve Site, and in wells located hydrogeologically downgradient (south-southeast) of the EZ Serve Site in Colorado Avenue (EZ-4 and EZ-5), in Adams Street (wells EZ-6, EZ-12 through EZ-14, MW-15 and MW-16), and on the Adams Elementary School property (well EZ-9)(GESI, 2014)(Appendix D).

The EZ-Serve Site was found to be the source of the free product in Adams Street based on the results of a free product forensics investigation conducted by Atlas in January 2010. The analysis included the collection and analysis of free product samples from wells MW-2 (since re-installed as “MW-2R”), MW-7 (located on the EZ Serve Site) and MW-16 (located in Arlington Avenue). The objective of the investigation was to assess whether the free product in wells located in Adams Street, originated from the Rapid Site, the EZ Serve Site, or from both. The results of the investigation showed that the free product formulation in the samples from wells MW-2 and MW-7 were different, and that the free product in the sample from well MW-16 most resembled the key markers from the product sampled from well MW-7, and the absence of key markers from the product sampled from well MW-2 (Atlas, 2010). The RWQCB subsequently assigned the responsibility for petroleum hydrocarbons in monitoring wells MW-7 and MW-14 through MW-15 to the EZ Serve Site (Atlas, 2010).

### **Well MW-17**

Free product has been consistently detected in well MW-17 since 2009 (Appendix D). FREY has been removing free product from MW-17 on an approximate weekly basis as directed by the RWQCB. However, the source of the free product in well MW-17 is not readily apparent. Atlas conducted additional free product testing in 2010, which included the collection of free product samples from well MW-17 and wells MW-2 (at the Rapid site) and well MW-19 (at the 6000 Arlington Street property located hydrogeologically downgradient of the Rapid site). A comparison of BTEX concentration ratios was conducted as part of the testing. Atlas concluded that based on the BTEX concentration ratios, “it appears that the LNAPL in well MW-2 and MW-19 are similar and there is a lack of correlation with well MW-17” (Atlas, 2010).

## POTENTIAL FACTORS AFFECTING THE DISTRIBUTION OF PETROLEUM HYDROCARBONS IN THE SITE VICINITY

### DECOMPOSED GRANITE

Decomposed granite has been reported to occur beneath the alluvial deposits beneath both sites. In some instances, a conflicting description of “bedrock” was used by a previous consultant on some borings logs to describe the layer described as decomposed granite by others. However, it was assumed by Atlas that the “bedrock” term used by the previous consultant was in actuality decomposed or weathered granite due to the continued ability to advance the borings with no refusal which is “not characteristic of boring advancement into bedrock” (Atlas, 2010).

Atlas conducted a site specific review of the lithology in the area of both sites to “establish the possible flow dynamic of the LNAPL in relation to the underlying lithology specifically bedrock beneath the site.” (Atlas, 2010). To conduct the assessment, Atlas created geologic cross-sections using boring logs generated during previous subsurface investigations. Copies of the cross sections are presented in Appendix E. Atlas concluded that the information extrapolated from the cross-sections was “inconclusive for defining a correlation of LNAPL movement using the decomposed granite layer as a pathway due to the discontinuity in the lithology shown in A-A’ and B-B’.” (Atlas, 2010).

Geologic cross-sections were subsequently developed by GESI in 2013 which incorporated data from subsurface investigations conducted after 2010. The geologic cross-sections prepared by GESI are included in Appendix F. The geologic cross-sections prepared by GESI show interpreted petroleum hydrocarbon impacted soil thicknesses/depths based on laboratory data and odors, and estimated free product depths. The geologic cross sections prepared by GESI similarly indicate discontinuities in the decomposed granite layer. GESI made no conclusions regarding the decomposed granite affecting groundwater or free product flow, but stated, “FHPs (free phase hydrocarbons) are present and have migrated offsite and downgradient along the groundwater table towards the southeast.” Additionally, GESI concluded that “the flow of groundwater is the primary contaminant transport mechanism for FPHs and dissolved phase hydrocarbons.” (GESI, 2013)

Based on information from available boring logs for both sites, FREY prepared an iso-depth map showing reported depths to the top of decomposed granite which is shown on Figure 6. The data indicates that the top of the decomposed granite is generally discontinuous, and is generally encountered at much shallower depths at the former EZ Serve Site than at the Rapid Gas Site (Figure 6).

## **SOIL AND GROUNDWATER REMEDIATION**

The conduct of soil vapor extraction, air sparging and/or high-vacuum dual phase extraction (HVDPE) between 2005 and the present at the Rapid Site, and the conduct of HVDPE at the EZ Serve Site for approximately 12 months in 2012 and 2013, could potentially have induced movement of petroleum hydrocarbons toward or away from the respective source areas at the Rapid Site and EZ Serve Site. However, given the relatively large size of the petroleum hydrocarbon plumes associated with both sites, and vacuum response data obtained during current remediation being conducted at the Rapid Site (FREY, 2015b), it is unlikely that the active remediation conducted at each site caused any significant movement of impacted soil vapor or groundwater to or from off-site locations.

## **DISCUSSION**

Based on the free product forensic investigation conducted by Atlas in 2010 (product sampling of wells MW-2, MW-7 and MW-16), and the historic groundwater flow direction across the Rapid Site and EZ Serve Site and in the site vicinity (Figures 4 and 5), the following is apparent regarding free product in off-site wells: (1) the free product detected in the wells in Adams Street, wells in Colorado Avenue, and the well on the Adams Street Elementary School property appear to have originated from the EZ Serve Site; and 2) the free product detected in the wells east-southeast of the Rapid Site on the 6000 Arlington Avenue property appear to have originated from the Rapid Site. There is no evidence to suggest that any preferential pathways were or are present that would induce movement of free product in direction(s) other than the general historic estimated groundwater flow directions across each site and in the site vicinity.

The RWQCB assigned responsibility of removal of free product from well MW-17 to Rapid Gas. However, the source of the free product in MW-17 appears to be the former EZ Serve site because: (1) the additional free product testing conducted by Atlas in 2010 on free product in wells MW-17, MW-2 and MW-19, previously discussed herein, suggest the free product in well MW-17 was different based on BTEX ratios to that in MW-2 and MW-19; (2) based on the estimated historic groundwater flow directions across both sites and in the site vicinity, and the distribution of free product across the Rapid Site, it appears that well MW-17 is located hydrogeologically downgradient of the wells in Adams Street that contain free product that originated from the EZ Serve Site, and; (3) a large distance exists between well MW-20 with free product originating from the Rapid Site (the nearest well to MW-17) and well MW-17, with two wells in between that have never contained free product (wells RW-12 and RW-13).

FREY concurs with the findings of Atlas (Atlas, 2010) that the decomposed granite present beneath the shallow alluvial fill beneath both sites and in the site vicinity does not appear to have historically affected the movement of free product or groundwater in the subsurface. Petroleum hydrocarbons and free product appear to have readily moved into and through the decomposed granite based on soil sample laboratory data, which does not indicate that petroleum hydrocarbon movement vertically through the vadose zone was inhibited by the decomposed granite. The only indication that the decomposed granite, or more likely competent bedrock beneath the decomposed

granite, may be affecting groundwater flow / free product movement is the groundwater elevation data for the former EZ Serve Site which indicates northeast and southeast components of groundwater flow on the former EZ Serve site. Should groundwater levels continue to decrease below their current historic lows, it is possible that the groundwater flow directions and movement of free product could be altered as groundwater levels drop to and below the depths of competent bedrock beneath the decomposed granite.

The general historical estimated groundwater flow directions across each site and in the site vicinity as described herein and the free product forensic testing conducted in 2010 indicate that: (1) impacted groundwater in and west of Adams Street was caused by the EZ Serve Site release(s); (2) impacted groundwater east-southeast of the Rapid Site was caused by release(s) at the Rapid Site, and; (3) impacted groundwater east of Adams Street may be commingled.

### CONCLUSIONS

Based on the information presented herein, the extent and distribution of impacted soil and groundwater associated with the respective releases of petroleum hydrocarbons from the Rapid Site and the EZ Serve Site can be generally differentiated as follows:

- Impacted vadose zone soils associated with releases from the Rapid Site and the EZ Serve Site were generally limited in extent to on-site soils for both sites.
- Impacted groundwater associated with the Rapid Site release(s) exist on-site and in groundwater hydrogeologically downgradient (generally east-southeast) of the Rapid Site, which generally corresponds to areas located east of Adams Street. Impacted groundwater associated with release(s) at the Rapid Site have been adequately assessed.
- Impacted groundwater associated with release(s) at the EZ Serve Site exist on-site and in groundwater hydrogeologically downgradient (generally south-southeast) of the EZ Serve Site. In addition, impacted groundwater southwest and northeast of the EZ Serve Site appears to have been caused by release(s) from the EZ Serve Site. Impacted groundwater associated with the EZ Serve Site release has been adequately assessed except to the west.
- Impacted groundwater east of Adams Street may be commingled.
- Free product in wells located on the EZ Serve Site and in wells located in and west of Adams Street originated from the EZ Serve Site.
- Free product in wells located on the Rapid Site and in wells located east-southeast of the Rapid Site (with the exception of MW-17) originated from the Rapid Site.

## LIMITATIONS

The judgments described in this report are professional opinions based solely within the limits of the scope of work authorized, and pertain to conditions judged to be present or applicable at the time the work was performed. Future conditions may differ from those described herein, and this report is not intended for future evaluations of this Site unless an update is conducted by a consultant familiar with environmental assessments.

This report was compiled partially from information supplied to FREY Environmental, Inc. from outside sources, other information that is in the public domain and a visual inspection of the property. FREY Environmental, Inc. makes no warranty as to the accuracy of statements made by others, which may be contained in this report, nor are any other warranties or guarantees, expressed or implied, included or intended by the report, except that it has been prepared in accordance with the current accepted practices and standards consistent with the level of care and skill exercised under similar circumstances by other professional consultants or firms performing similar services.

Site conditions may change with time as the result of natural alterations or man-made changes on this or adjacent properties. Future environmental investigations conducted at the Site may reveal site conditions not indicated in the data reviewed by FREY Environmental, Inc. Additionally, changes in standards or regulations applicable to the Site may occur. The findings of this report may be partially or wholly invalidated by changes of which FREY Environmental, Inc. is not aware or has not had the opportunity to evaluate.

Environmental assessments provide an additional source on information regarding the environmental conditions of a particular property or facility. The report to the Client is a professional opinion and judgment, dependent upon FREY's knowledge and information obtained during the course of performance of the services.

Should you have any questions, please contact us at (949) 723-1645.

Sincerely,  
FREY Environmental, Inc.

  
Joe Frey  
Principal Certified  
Engineering Geologist  
CEG #1500



  
Ed Rands  
Senior Project Engineer  
P.E. #58183



## **Attachments**

### References

Figure 1 - Site Location Map

Figure 2 - Site Vicinity Sketch

Figure 3 - Site Sketch Showing Soil Boring, Vapor Probe, Vapor Extraction, Groundwater Monitoring and Groundwater Recovery Well Locations

Figure 4 - Rose Diagram Showing Historic Groundwater Flow Directions – Rapid Gas #37

Figure 5 - Rose Diagram Showing Historic Groundwater Flow Directions – Former EZ Serve

Figure 6 - Site Sketch Showing Reported Depths to Top of Decomposed Granite

Appendix A - Groundwater Elevation Maps - Various Dates in 2012 and 2013

Appendix B - Historic Groundwater Monitoring and Sampling Results Table for Rapid and Former EZ Serve Sites (Q4-2014)

Appendix C - Most Recent Groundwater Elevation Map and Isoconcentration Maps Showing Data for Both Sites (Q4-14)

Appendix D - Historic Free Product Monitoring and Removal Tables

Appendix E - Geologic Cross Sections Prepared by Atlas

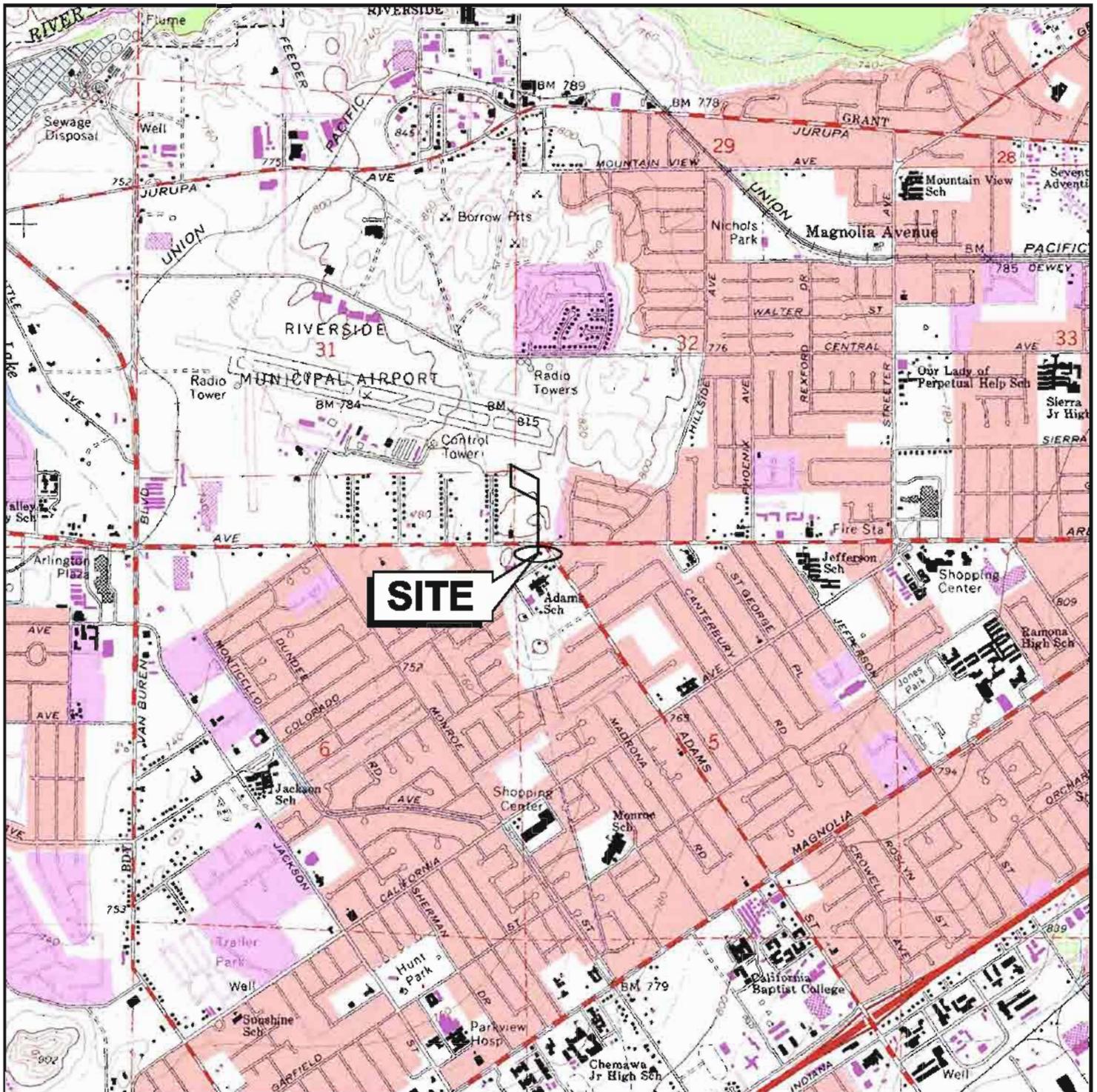
Appendix F - Geologic Cross Sections Prepared by GESI

cc: Jeff Appel – Rapid Gas, Inc.  
Tom Robins – CF United PropCo LLC  
SWRCB Geotracker Database

## REFERENCES

- Atlas (Atlas Environmental Engineering, Inc.), 2002; *Tank Removal and Interim Remediation Report, United Oil Company Station #37, 6020 Arlington Avenue, Riverside, California*, dated February 18, 2003.
- \_\_\_\_\_, 2010; *Additional Site Investigation Report, Rapid Gas Station #37, 6020 Arlington Avenue, Riverside, California*, dated October 26, 2010.
- \_\_\_\_\_, 2011; *Dual Phase Extraction Pilot Test, Well Installation and Soil Gas Survey Work Plan, Rapid Gas Station #37, 6020 Arlington Avenue, Riverside, California*, dated April 30, 2011.
- FREY, 2015a; *Groundwater Monitoring Well Monitoring and Sampling and Quarterly Corrective Action Status Site Update – Second Quarter 2015, Rapid Gas Station #37, 6020 Arlington Avenue, Riverside, California*; dated August 31, 2015.
- \_\_\_\_\_, 2015b; *Third Quarter 2015 Soil Vapor Extraction System Start-up and Free Product Recovery Report and Corrective Action Status Update, Rapid Gas #37, 6020 Arlington Avenue, Riverside, California*; dated October 22, 2015.
- GESI (GeoEnviro Services, Inc.), 2013; *Site Conceptual Model Update and Interim Remedial Action Plan Addendum, Commingled Plume CP0050, Rapid Gas #37 / Former EZ Serve (ARCO 1216), 6020 and 6050 Arlington Avenue, Riverside, California*, dated March 4, 2013.
- \_\_\_\_\_, 2014; *Groundwater Monitoring and Sampling Report Fourth Quarter 2014, Commingled Plume CP0050, Rapid Gas #37 / Former EZ Serve (ARCO 1216), 6020 and 6050 Arlington Avenue, Riverside, California*, dated December 9, 2014.
- RCH (Riverside County HAZMAT), 1986; Field inspection report of UST removal at ARCO EZ Serve at Arlington and Adams, Riverside, California with laboratory data attached, dated October 1, 1986.

## **FIGURES**



**NOTE:**

1. Base map from USGS 7.5 minute Riverside-West (dated 1967, Rev. 1980) California topographic quadrangle

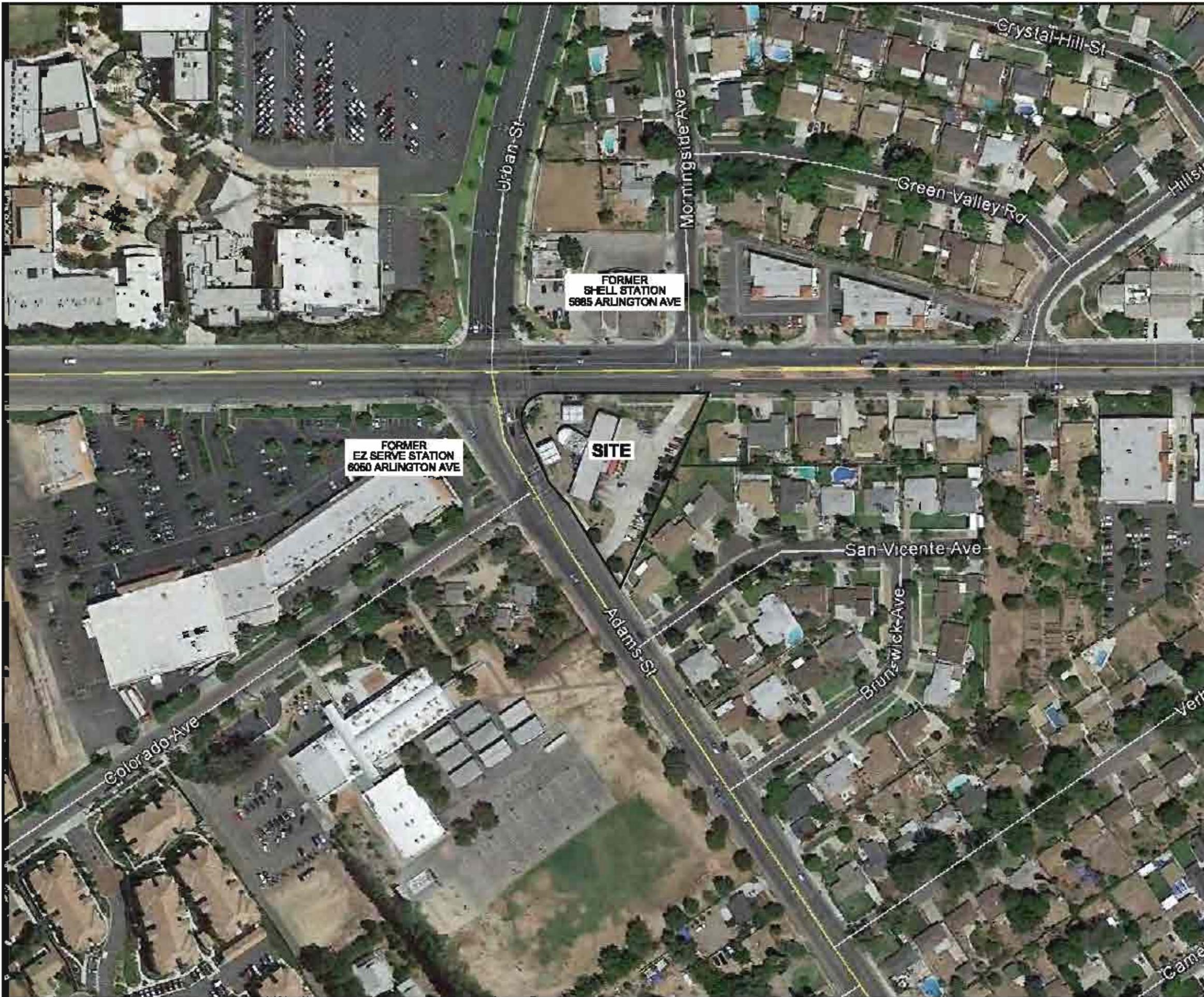


**SITE LOCATION MAP**

**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

**FREY ENVIRONMENTAL, INC.**

CLIENT: Rapid Gas	PROJECT No.: 284-70	DATE: 07/2015
FILE NAME: 284-70-SL.DWG		<b>FIGURE 1</b>



**LEGEND**

**NOTES:**

- 1. All locations and dimensions are approximate.
- 2. Site Sketch from Google Earth Aerial Photo.

0 150 300

APPROXIMATE SCALE IN FEET

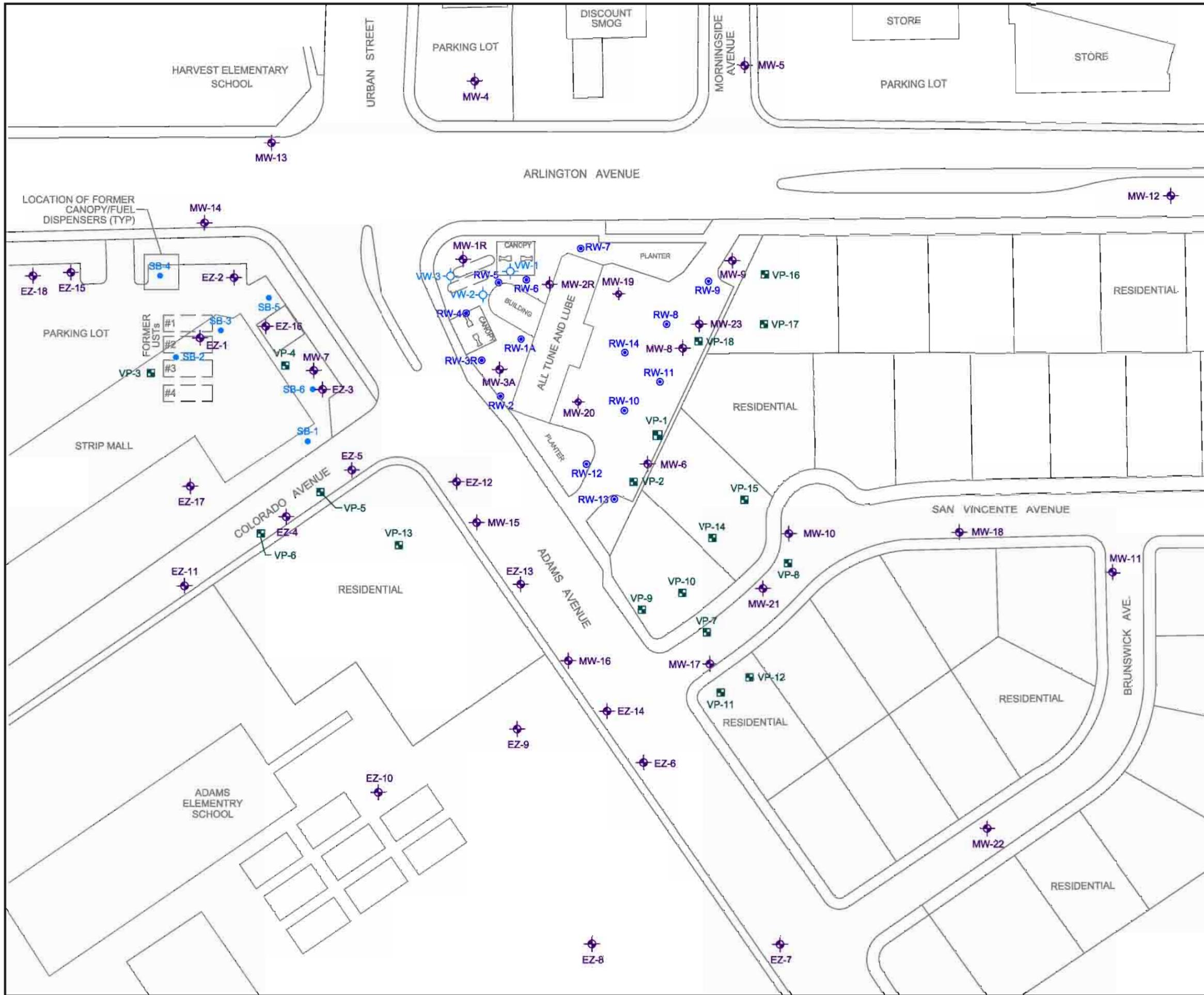


**SITE VICINITY SKETCH**

**RAPID GAS #37**  
 6020 ARLINGTON AVENUE  
 RIVERSIDE, CALIFORNIA

**FREY ENVIRONMENTAL, INC.**

CLIENT: Rapid Gas	PROJECT No.: 284-70	DATE: 08/20/15
FILE NAME: 284-70-VG.DWG		<b>FIGURE 2</b>

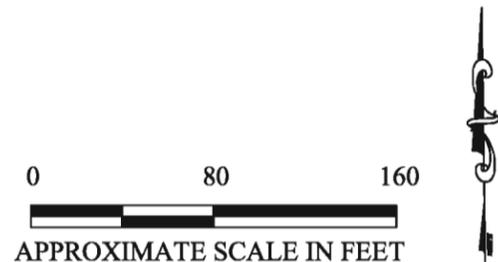


**LEGEND**

- SB-1 SOIL BORING LOCATION
- VP-8 VAPOR PROBE LOCATION
- RW-13 GROUNDWATER RECOVERY WELL
- MW1 GROUNDWATER MONITORING WELL LOCATION
- VW-2 VAPOR EXTRACTION WELL LOCATION

**NOTES:**

1. All locations and dimensions are approximate.
2. Site Sketch from Google Earth Aerial Photo.

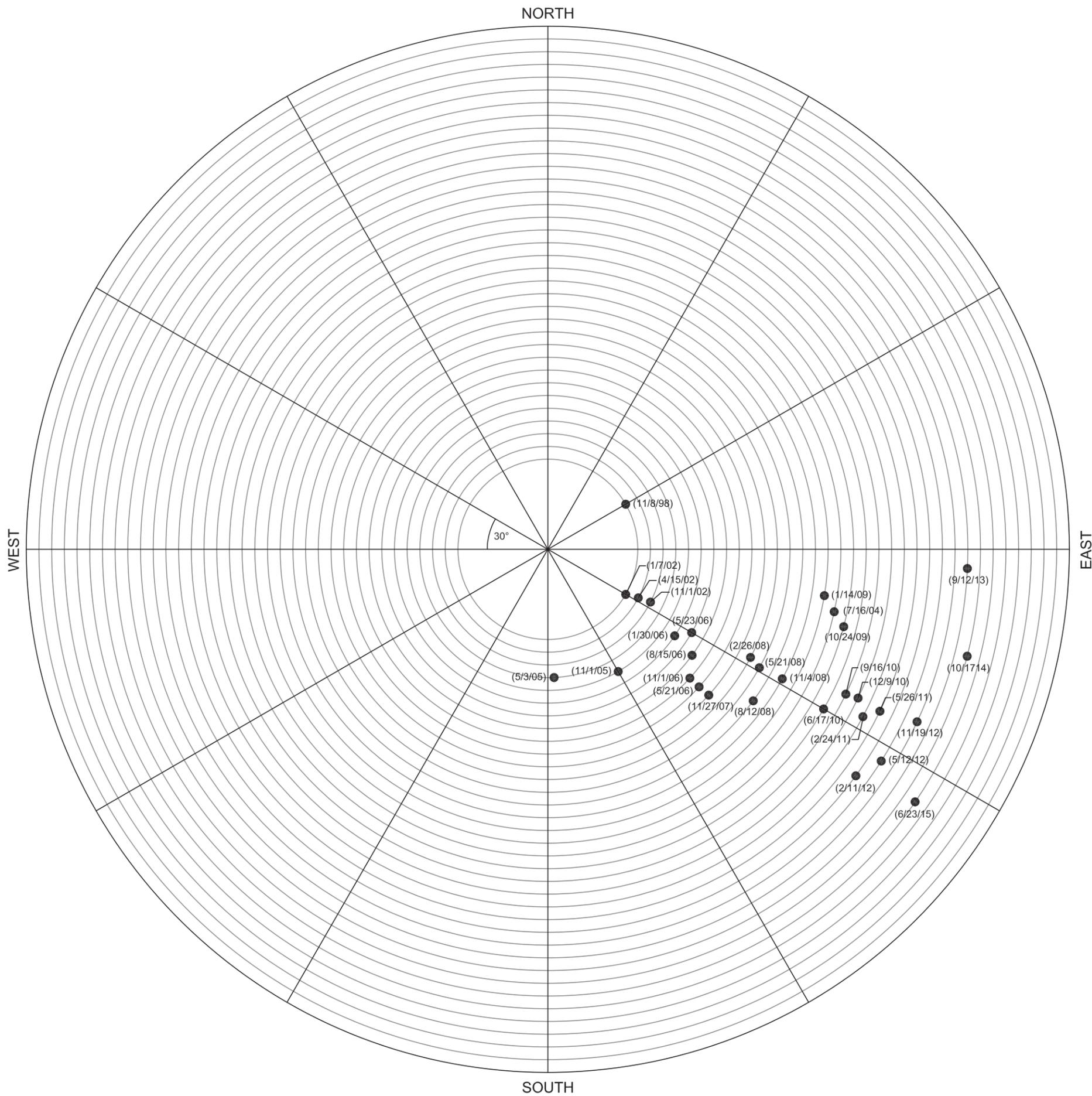


**SITE SKETCH SHOWING SOIL BORING, VAPOR PROBE, VAPOR EXTRACTION GROUNDWATER MONITORING AND GROUNDWATER RECOVERY WELL LOCATIONS**

**RAPID GAS #37**  
6020 ARLINGTON AVENUE  
RIVERSIDE, CALIFORNIA

**FREY ENVIRONMENTAL, INC.**

CLIENT: Rapid Gas	PROJECT No.: 284-70	DATE: 07/2015
FILE NAME: 284-70-ST.DWG		<b>FIGURE 3</b>



**LEGEND**

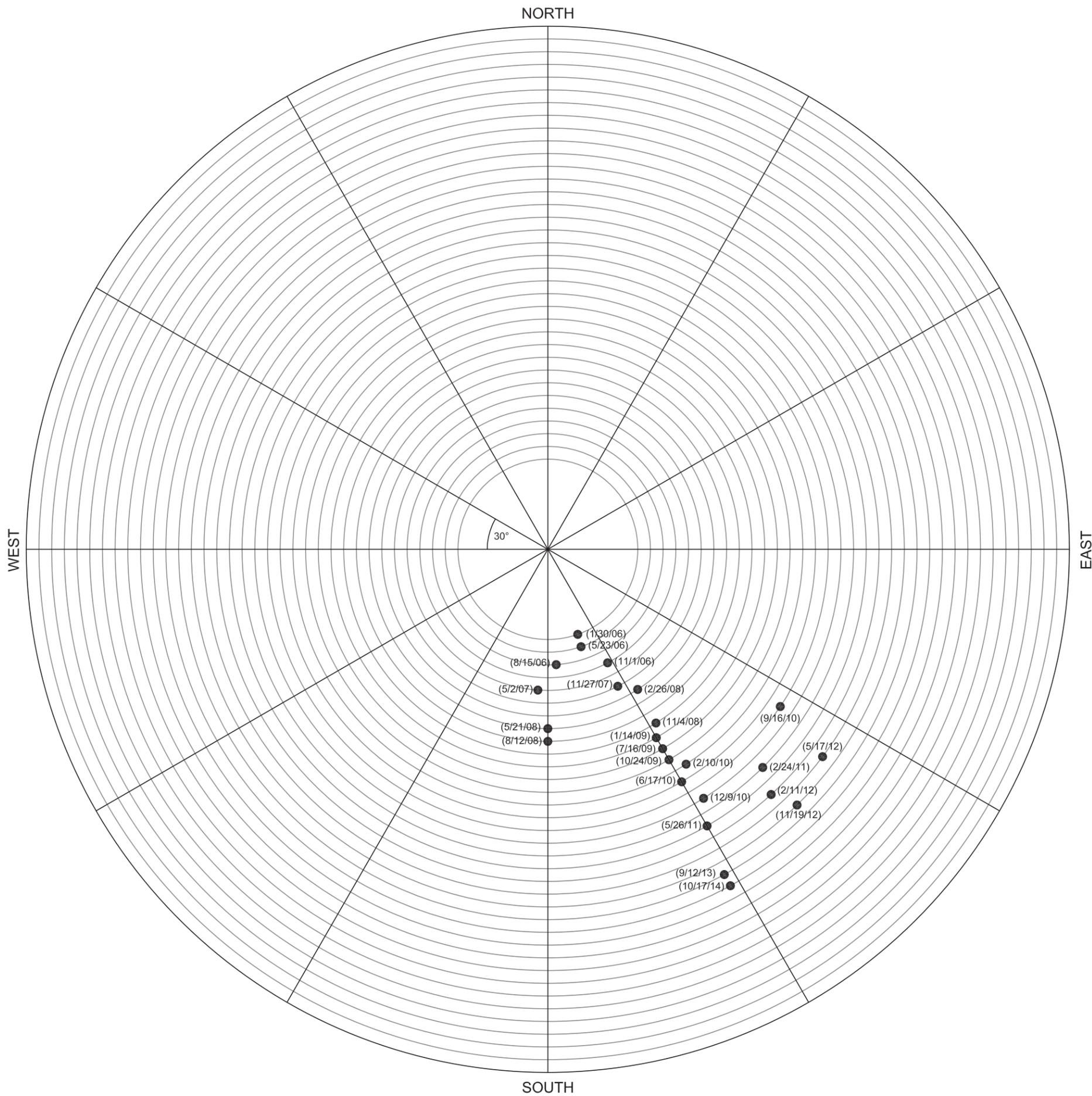
- ESTIMATED GROUNDWATER FLOW DIRECTION
- (6/23/15) WITH DATE OF ESTIMATED GROUNDWATER FLOW DIRECTION

**ROSE DIAGRAM SHOWING HISTORIC GROUNDWATER FLOW DIRECTIONS**

**RAPID GAS #37**  
 6020 ARLINGTON AVENUE  
 RIVERSIDE, CALIFORNIA

**FREY ENVIRONMENTAL, INC.**

CLIENT: Rapid Gas	PROJECT No.: 284-70	DATE: 10/2015
FILE NAME: 284-70-RD2.DWG		<b>FIGURE 4</b>



**LEGEND**

- ESTIMATED GROUNDWATER FLOW DIRECTION
- (11/17/14) WITH DATE OF ESTIMATED GROUNDWATER FLOW DIRECTION

**ROSE DIAGRAM SHOWING HISTORIC GROUNDWATER FLOW DIRECTIONS**

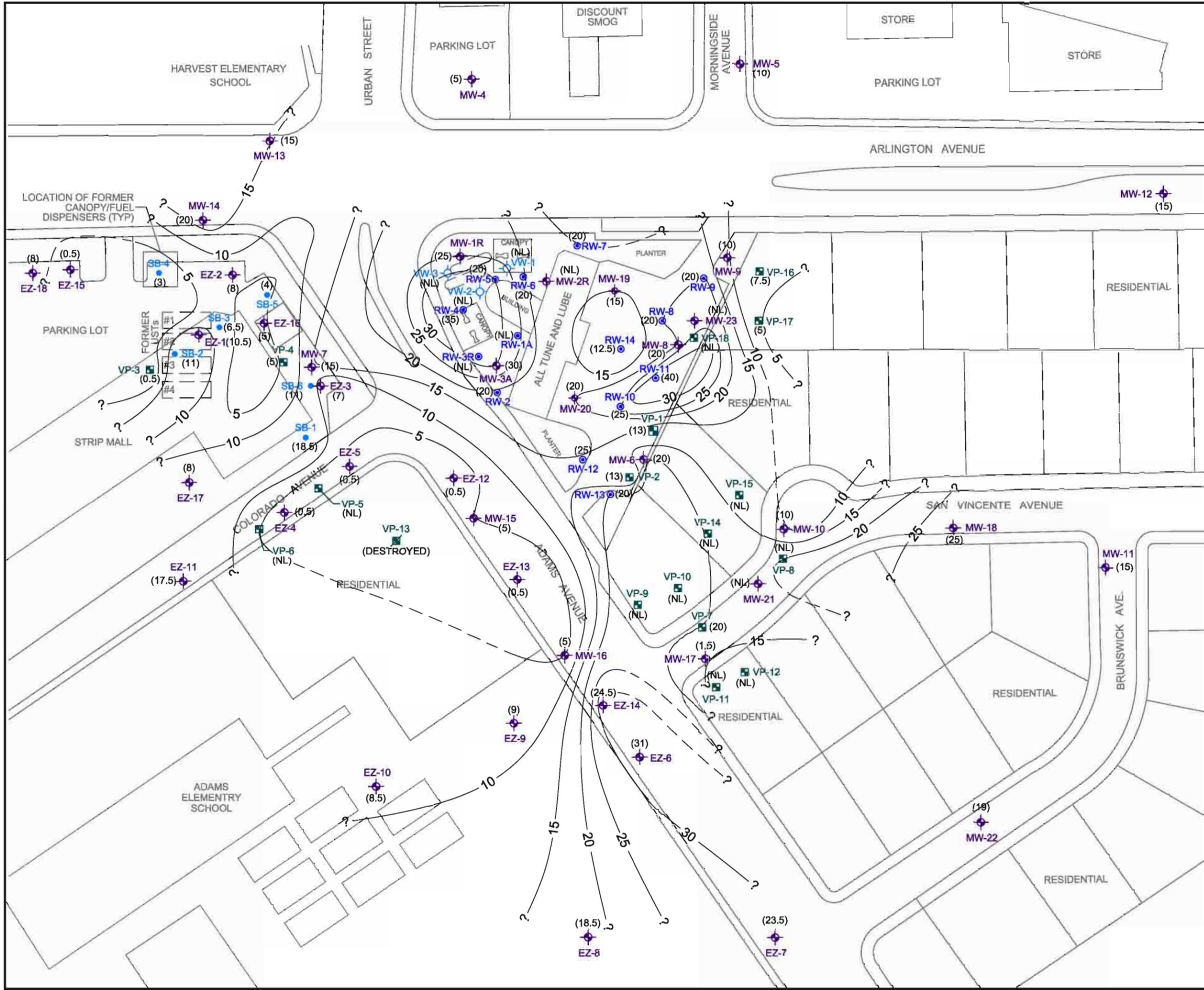
FORMER EZ SERVE STATION  
6050 ARLINGTON AVENUE  
RIVERSIDE, CALIFORNIA

**FREY ENVIRONMENTAL, INC.**

CLIENT: Rapid Gas	PROJECT No.: 284-70	DATE: 10/2015
----------------------	------------------------	------------------

FILE NAME:  
284-70-RD2.DWG

**FIGURE 5**



**LEGEND**

- SB-1 SOIL BORING LOCATION
- VP-8 VAPOR PROBE LOCATION
- ⊙ RW-13 GROUNDWATER RECOVERY WELL
- ⊕ MW1 GROUNDWATER MONITORING WELL LOCATION
- ⊙ VW-2 VAPOR EXTRACTION WELL LOCATION

(10) REPORTED DEPTH IN FEET BELOW GROUND SURFACE TO TOP OF DECOMPOSED GRANITE; NL = NOT LOGGED; NE = NOT ENCOUNTERED

— 10 — ISO-DEPTH CONTOUR SHOWING ESTIMATED TOP OF DECOMPOSED GRANITE (FEET BELOW GROUND SURFACE)

**NOTES:**

- All locations and dimensions are approximate.
- Site Sketch from Google Earth Aerial Photo.

0 80 160

APPROXIMATE SCALE IN FEET

**SITE SKETCH SHOWING REPORTED DEPTHS TO TOP OF DECOMPOSED GRANITE**

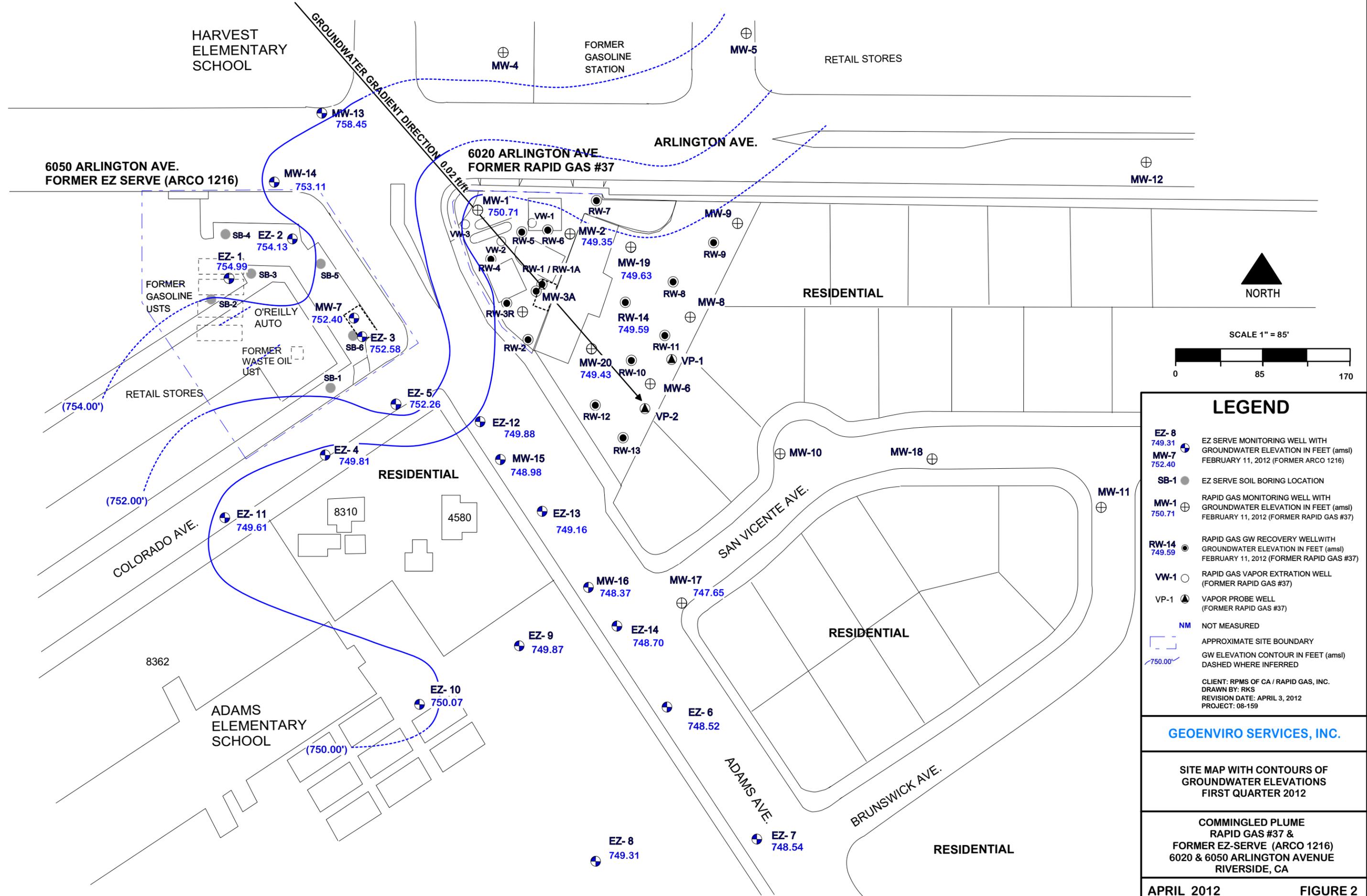
**RAPID GAS #37**  
6020 ARLINGTON AVENUE  
RIVERSIDE, CALIFORNIA

**FREY ENVIRONMENTAL, INC.**

CLIENT: Rapid Gas	PROJECT No.: 284-70	DATE: 11/2015
FILE NAME: 284-70-TDG.DWG		<b>FIGURE 6</b>

**APPENDIX A**

**GROUNDWATER ELEVATION MAPS -  
VARIOUS DATES IN 2012 AND 2013**



### LEGEND

- EZ-8**  
749.31 EZ SERVE MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) FEBRUARY 11, 2012 (FORMER ARCO 1216)
- MW-7**  
752.40 RAPID GAS MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) FEBRUARY 11, 2012 (FORMER RAPID GAS #37)
- SB-1** EZ SERVE SOIL BORING LOCATION
- MW-1**  
750.71 RAPID GAS MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) FEBRUARY 11, 2012 (FORMER RAPID GAS #37)
- RW-14**  
749.59 RAPID GAS GW RECOVERY WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) FEBRUARY 11, 2012 (FORMER RAPID GAS #37)
- VW-1** RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)
- VP-1** VAPOR PROBE WELL (FORMER RAPID GAS #37)
- NM** NOT MEASURED
- APPROXIMATE SITE BOUNDARY
- GW ELEVATION CONTOUR IN FEET (amsl) DASHED WHERE INFERRED

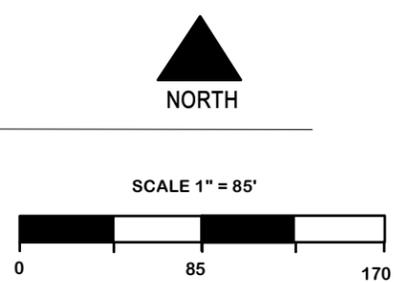
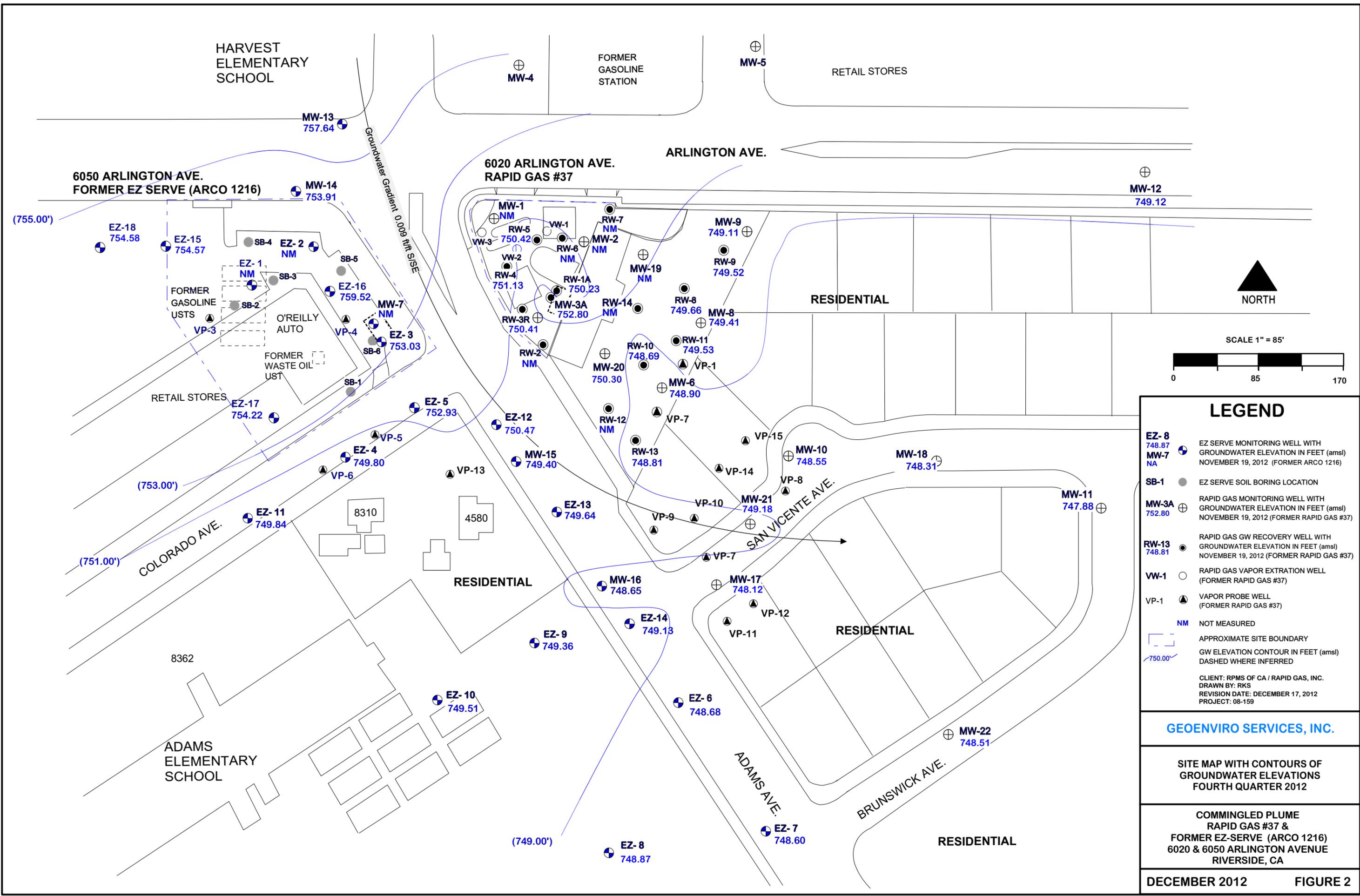
CLIENT: RPMS OF CA / RAPID GAS, INC.  
 DRAWN BY: RKS  
 REVISION DATE: APRIL 3, 2012  
 PROJECT: 08-159

**GEOENVIRO SERVICES, INC.**

**SITE MAP WITH CONTOURS OF GROUNDWATER ELEVATIONS FIRST QUARTER 2012**

**COMMINGLED PLUME RAPID GAS #37 & FORMER EZ-SERVE (ARCO 1216) 6020 & 6050 ARLINGTON AVENUE RIVERSIDE, CA**

**APRIL 2012** **FIGURE 2**



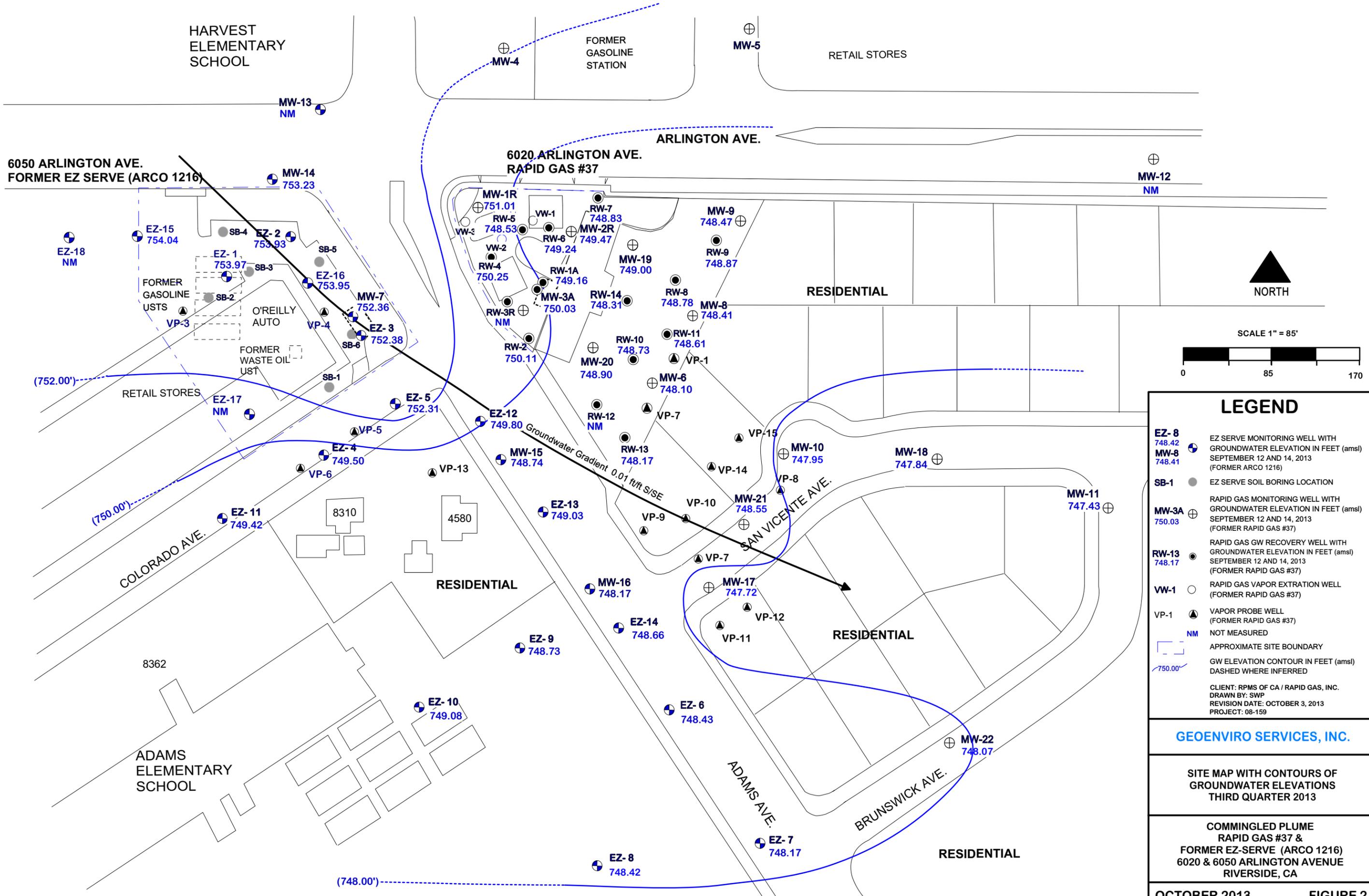
LEGEND	
<b>EZ-8</b> 748.87	EZ SERVE MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) NOVEMBER 19, 2012 (FORMER ARCO 1216)
<b>MW-7</b> NA	
<b>SB-1</b>	
<b>MW-3A</b> 752.80	RAPID GAS MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) NOVEMBER 19, 2012 (FORMER RAPID GAS #37)
<b>RW-13</b> 748.81	RAPID GAS GW RECOVERY WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) NOVEMBER 19, 2012 (FORMER RAPID GAS #37)
<b>VW-1</b>	RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)
<b>VP-1</b>	VAPOR PROBE WELL (FORMER RAPID GAS #37)
<b>NM</b>	NOT MEASURED
	APPROXIMATE SITE BOUNDARY
	GW ELEVATION CONTOUR IN FEET (amsl) DASHED WHERE INFERRED
CLIENT: RPMS OF CA / RAPID GAS, INC. DRAWN BY: RKS REVISION DATE: DECEMBER 17, 2012 PROJECT: 08-159	

**GEOENVIRO SERVICES, INC.**

SITE MAP WITH CONTOURS OF GROUNDWATER ELEVATIONS FOURTH QUARTER 2012

COMMINGLED PLUME RAPID GAS #37 & FORMER EZ-SERVE (ARCO 1216) 6020 & 6050 ARLINGTON AVENUE RIVERSIDE, CA

DECEMBER 2012      FIGURE 2



### LEGEND

- EZ-8**  
748.42  
**MW-8**  
748.41
- EZ SERVE MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) SEPTEMBER 12 AND 14, 2013 (FORMER ARCO 1216)
- SB-1**
- EZ SERVE SOIL BORING LOCATION
- MW-3A**  
750.03
- RAPID GAS MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) SEPTEMBER 12 AND 14, 2013 (FORMER RAPID GAS #37)
- RW-13**  
748.17
- RAPID GAS GW RECOVERY WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) SEPTEMBER 12 AND 14, 2013 (FORMER RAPID GAS #37)
- VW-1**
- RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)
- VP-1**
- VAPOR PROBE WELL (FORMER RAPID GAS #37)
- NM**
- NOT MEASURED
- 
- APPROXIMATE SITE BOUNDARY
- GW ELEVATION CONTOUR IN FEET (amsl) DASHED WHERE INFERRED

CLIENT: RPMS OF CA / RAPID GAS, INC.  
 DRAWN BY: SWP  
 REVISION DATE: OCTOBER 3, 2013  
 PROJECT: 08-159

**GEOENVIRO SERVICES, INC.**

SITE MAP WITH CONTOURS OF GROUNDWATER ELEVATIONS THIRD QUARTER 2013

COMMINGLED PLUME  
 RAPID GAS #37 &  
 FORMER EZ-SERVE (ARCO 1216)  
 6020 & 6050 ARLINGTON AVENUE  
 RIVERSIDE, CA

OCTOBER 2013 FIGURE 2

**APPENDIX B**

**HISTORIC GROUNDWATER MONITORING AND SAMPLING RESULTS  
TABLE FOR RAPID AND FORMER EZ SERVE SITES (Q4-2014)**

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
MW-1 ~X-28 screen	11/06/98	778.00	0.00	23.95	754.05	103,000	22,500	25,000	2,000	14,300	--	--	340*	--	--	--	--
	02/23/99	778.00	0.00	23.62	754.38	82,700	24,300	26,100	2,210	12,800	--	--	484*	--	--	--	--
	06/08/99	778.00	0.00	23.76	754.24	108,000	25,800	26,300	1,600	10,700	--	--	314	--	--	--	--
	08/26/99	778.00	0.00	23.88	754.12	109,000	27,100	26,800	1,760	9,580	--	--	784	--	--	--	--
	11/23/99	778.00	0.00	24.08	753.92	108,000	25,900	33,200	2,210	15,000	--	--	9700	--	--	--	--
	01/17/00	778.00	0.00	23.95	754.05	94,600	20,800	31,100	1,780	14,000	<5	<5	910	<5	<25	--	--
	04/05/00	778.00	0.00	23.47	754.53	104,000	18,000	37,800	2,430	18,900	<500	<500	292	<500	<2500	--	--
	07/14/00	778.00	0.01	24.04	753.97	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/13/00	778.00	0.16	24.22	753.90	FPH	--	--	--	--	--	--	--	--	--	--	--
	01/05/01	778.00	0.14	25.22	752.89	FPH	--	--	--	--	--	--	--	--	--	--	--
	04/06/01	778.00	Sheen	24.72	753.28	--	--	--	--	--	--	--	--	--	--	--	--
	07/06/01	778.00	0.06	25.28	752.77	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/23/01	778.00	0.04	25.34	752.69	FPH	--	--	--	--	--	--	--	--	--	--	--
	03/15/02	778.00	Sheen	26.01	751.99	--	--	--	--	--	--	--	--	--	--	--	--
	04/15/02	778.00	0.12	26.17	751.92	FPH	--	--	--	--	--	--	--	--	--	--	--
	07/09/02	778.00	0.08	26.51	751.55	FPH	--	--	--	--	--	--	--	--	--	--	--
	11/01/02	778.00	0.12	26.65	751.44	FPH	--	--	--	--	--	--	--	--	--	--	--
	01/31/03	778.00	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	04/18/03	778.00	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	07/23/03	778.00	0.01	25.10	752.91	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/02/03	778.00	0.00	25.76	752.24	180,000	24,000	28,000	2,300	17,800	<20	<20	280	<20	830	--	--
	02/17/04	778.00	0.02	26.08	751.94	150,000	25,000	27,000	2,300	17,700	<200	<200	330	<200	<1000	--	--
	05/05/04	778.00	0.02	25.80	752.22	150,000	19,000	22,000	1,800	13,500	<400	<400	<400	<400	<2000	--	--
	08/03/04	778.00	0.11	26.40	751.68	130,000	32,000	25,000	2,500	16,700	<400	<400	<400	<400	<2000	--	--
	10/05/04	778.00	0.18	26.54	751.60	140,000	29,000	27,000	2,800	20,700	<400	<400	<400	<400	<2000	--	--
	02/01/05	778.00	0.00	24.84	753.16	140,000	36,000	35,000	2,400	17,500	<400	<400	<400	140J	<400	<2000	--
	05/03/05	778.00	0.00	23.64	754.36	95,000	27,000	27,000	23,000	16,000	<1000	<1000	<1000	<1000	<5000	--	--
	08/02/05	779.34	0.00	23.35	755.99	83,000	31,000	30,000	2,200	15,000	<1000	<1000	<1000	<1000	<5000	--	--
	11/01/05	779.34	0.00	24.02	755.32	180,000	24,000	25,000	2,000	16,000	<1000	<1000	<1000	<1000	<5000	--	--
	01/30/06	779.34	0.00	24.42	754.92	84,000	21,000	20,000	1,600	16,600	<400	<400	<400	<400	<2000	--	--
	05/23/06	779.34	0.00	24.53	754.81	150,000	18,000	14,000	1,500	11,200	<1000	<1000	2000	<1000	<5000	--	--
	08/16/06	779.34	0.00	24.18	755.16	2,000,000	30,000	26,000	1,900	11,700	<400	<400	<400	<400	<2000	--	--
	11/01/06	779.34	0.00	24.15	755.19	190,000	36,000	22,000	2,200	11,100	<1000	<1000	<1000	<1000	<5000	--	--
	01/31/07	779.34	0.00	24.21	755.13	120,000	26,000	27,000	2,300	10,900	<2000	<2000	<2000	<2000	<10000	--	--
	05/02/07	779.34	0.00	24.48	754.86	68,000	17,000	6,500	1,500	4,800	<1000	<1000	<1000	<1000	<5000	--	--
	08/20/07	779.34	0.00	24.95	754.39	71,000	14,000	6,700	1,900	7,100	<200	<200	<200	<200	<1000	--	--
	11/27/07	779.34	0.00	25.42	753.92	77,000	21,000	14,000	1,600	6,700	<200	<200	<200	<200	<1000	--	--
	02/26/08	779.34	0.00	25.28	754.06	82,000	25,000	18,000	1,700	6,100	<400	<400	<400	<400	<2000	--	--
	05/21/08	779.34	0.00	25.42	753.92	51,000	13,000	4,000	1,200	6,000	<400	<400	<400	<400	<2000	--	--
	08/12/08	779.34	0.00	25.82	753.52	93,000	25,000	11,000	2,100	4,900	<400	<400	1,400	490	22,000	--	--
	11/05/08	779.34	0.00	26.32	753.02	72,000	22,000	13,000	1,800	4,600	<1000	<1000	<1000	<1000	17,000	--	--
	01/14/09	779.34	0.00	26.24	753.10	65,000	19,000	13,000	1,700	5,500	<400	<400	<400	<400	<2000	--	--
	07/16/09	779.34	0.00	26.95	752.39	36,300	17,900**	5,960**	1,240	3,950	<25	<25	<25	<25	<250	--	--
	10/29/09	779.34	0.00	DRY	DRY	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	779.34	0.15	28.00	751.45	FPH	--	--	--	--	--	--	--	--	--	--	--
06/17/10	779.34	Sheen	27.34	752.00	FPH	--	--	--	--	--	--	--	--	--	--	--	
09/16/10	779.34	Sheen	27.00	752.34	FPH	--	--	--	--	--	--	--	--	--	--	--	
12/09/10	779.34	Sheen	28.26	751.08	FPH	--	--	--	--	--	--	--	--	--	--	--	
02/24/11	779.34	Sheen	27.42	751.92	FPH	--	--	--	--	--	--	--	--	--	--	--	
05/26/11	779.34	Sheen	27.74	751.60	FPH	--	--	--	--	--	--	--	--	--	--	--	
12/08/11	779.34	1.00	28.23	751.86	FPH	--	--	--	--	--	--	--	--	--	--	--	
02/11/12	779.34	0.11	28.71	750.71	Sampling Not required in 1Q12	--	--	--	--	--	--	--	--	--	--	--	
05/17/12	779.34	0.23	28.27	751.24	FPH	--	--	--	--	--	--	--	--	--	--	--	
11/19/12	779.34	--	--	--	Vehicle Parked on Well	--	--	--	--	--	--	--	--	--	--	--	
06/06/13	Well abandoned and replaced by well MW-1R																
MW-1R ~15-45 screen	06/18/13	780.20	0.19	29.07	751.13	--	--	--	--	--	--	--	--	--	--	--	--
	09/12/13	780.20	0.14	29.30	751.01	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/17/14	780.20	1.14	31.42	749.64	FPH	--	--	--	--	--	--	--	--	--	--	--
MW-2 ~5-30 screen	11/06/98	777.10	0.00	23.90	753.20	91,100	20,200	26,700	2,330	13,900	--	--	451*	--	--	--	--
	02/23/99	777.10	0.00	23.82	753.28	67,000	16,500	23,300	2,070	12,400	--	--	738*	--	--	--	--
	06/08/99	777.10	0.00	23.86	753.24	72,600	12,200	21,100	1,550	8,730	--	--	414	--	--	--	--
	08/26/99	777.10	0.00	24.00	753.10	112,000	17,400	30,500	2,680	13,800	--	--	486	--	--	--	--
	11/23/99	777.10	0.00	24.35	752.75	94,000	17,100	33,000	2,900	15,300	--	--	350	--	--	--	--
	01/17/00	777.10	0.00	24.32	752.78	66,000	11,100	23,600	1,870	11,000	<5	<5	290	<25	<25	--	--
	04/05/00	777.10	0.00	23.81	753.29	58,400	9,150	24,900	1,850	11,400	<500	<500	286	<2500	<2500	--	--
	07/14/00	777.10	0.00	24.46	752.64	79,800	9,460	26,000	1,900	12,530	<500	<500	580	<2500	<2500	--	--
	10/13/00	777.10	0.00	24.76	752.34	94,500	11,000	30,200	2,020	14,820	<200	<200	448	<200	<1000	--	--
	01/05/01	777.10	0.00	25.12	751.98	82,000	12,200	27,500	2,420	14,360	<200	<200	620	<200	<1000	--	--
	04/06/01	777.10	0.00	24.69	752.41	68,600	12,400	28,500	2,630	15,330	<200	<200	668	<200	<1000	--	--
	07/06/01	777.10	0.00	25.21	751.89	84,200	18,000	27,100	2,940	16,640	<200	<200	1,500	<200	<1000	--	--
	10/23/01	777.10	0.00	25.52	751.58	75,400	11,500	25,000	2,530	14,200	<100	<100	1,150	<100	<500	--	--
	03/15/02	777.10	Sheen	26.12	750.98	90,200	17,700										

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
<b>MW-2</b>	08/03/04	777.10	0.13	26.91	750.29	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/05/04	777.10	0.05	26.81	750.33	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/01/05	777.10	0.08	25.39	751.77	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/03/05	777.10	0.01	23.71	753.40	110,000	25,000	33,000	3,500	20,600	<200	<200	2,900	<200	<1000	--	--
	08/02/05	779.03	0.00	23.95	755.08	76,000	17,000	28,000	3,100	18,800	<1000	<1000	2,900	<1000	<5000	--	--
	11/01/05	779.03	0.00	23.77	755.26	11,000	310	830	160	720	<20	<20	37.0	<20	<100	--	--
	01/30/06	779.03	0.00	24.73	754.30	47,000	8,900	11,000	1,500	11,900	45.0	<20	1,400	<20	280	--	--
	05/23/06	779.03	0.00	25.05	753.98	110,000	10,000	3,600	880	9,700	<200	<200	1,500	<200	<1000	--	--
	08/16/06	779.03	0.00	24.10	754.93	12,000	210	81.0	<5.0	940	<20	<20	340	<20	<100	--	--
	11/01/06	779.03	0.00	24.99	754.04	73,000	12,000	3,500	1,300	8,100	62.0	<20	1,300	<20	<100	--	--
	01/31/07	779.03	0.00	24.96	754.07	65,000	12,000	8,200	1,500	9,800	<400	<400	1,400	<400	<2000	--	--
	05/02/07	779.03	0.00	25.34	753.69	49,000	7,000	3,600	910	660	<400	<400	1,400	<400	<2000	--	--
	08/20/07	779.03	0.00	25.75	753.28	61,000	7,500	5,000	1,500	8,200	<200	<200	2,000	<200	<1000	--	--
	11/27/07	779.03	0.00	26.18	752.85	46,000	7,700	5,000	1,200	6,200	<100	<100	2,100	<100	<500	--	--
	02/26/08	779.03	0.00	25.80	753.23	49,000	7,100	7,200	1,200	7,400	<100	<100	640	<100	<500	--	--
	05/21/08	779.03	0.00	26.00	753.03	50,000	12,000	6,000	1,100	6,400	<200	<200	1,500	<200	<1000	--	--
	08/12/08	779.03	0.00	26.53	752.50	67,000	12,000	9,100	1,400	8,100	<400	<400	1,000	<400	<2000	--	--
	11/05/08	779.03	0.00	27.10	751.93	29,000	6,000	4,800	1,100	5,300	<200	<200	490	<200	<1000	--	--
	01/14/09	779.03	0.00	26.98	752.05	37,000	6,900	6,300	1,000	4,800	<100	<100	610	<100	<500	--	--
	07/16/09	779.03	0.45	27.90	751.47	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/29/09	779.03	0.88	28.90	750.79	FPH	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	779.03	0.95	29.20	750.55	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/17/10	779.03	0.37	28.25	751.06	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	779.03	0.70	28.70	750.86	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/09/10	779.03	1.30	29.30	750.71	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/24/11	779.03	0.55	28.30	751.15	FPH	--	--	--	--	--	--	--	--	--	--	--
05/26/11	779.03	0.07	28.10	750.98	FPH	--	--	--	--	--	--	--	--	--	--	--	
12/08/11	779.03	1.04	29.61	750.20	FPH	--	--	--	--	--	--	--	--	--	--	--	
02/11/12	779.03	0.68	30.19	749.35		Sampling Not required in 1Q12											
05/17/12	779.03	1.16	29.73	750.17	FPH	--	--	--	--	--	--	--	--	--	--	--	
11/19/12	779.03	--	--	--		Vehicle Parked on Well											
<b>06/06/13</b>	<b>Well abandoned and replaced by well MW-2R</b>																
<b>MW-2R</b>	06/18/13	779.68	0.00	29.42	750.26	48,900	380	3,500	920	16,000	<25	<25	210	<25	<250	<25	--
	~17-42 screen 10/18/14	<b>779.68</b>	<b>0.00</b>	<b>31.07</b>	<b>748.61</b>	<b>25,700</b>	<b>830</b>	<b>630</b>	<b>880</b>	<b>6,800</b>	<b>&lt;10</b>	<b>&lt;10</b>	<b>120</b>	<b>&lt;10</b>	<b>&lt;100</b>	--	--
<b>MW-3</b> ~5-30 screen	11/06/98	777.30	0.00	23.32	753.98	73,800	18,200	17,200	1,270	10,300	--	--	613*	--	--	--	--
	02/23/99	777.30	0.00	23.17	754.13	42,500	17,700	7,110	1,030	5,050	--	--	1140*	--	--	--	--
	06/08/99	777.30	0.00	23.32	753.98	48,300	19,500	4,550	521	2,030	--	--	845	--	--	--	--
	08/26/99	777.30	0.00	23.45	753.85	50,500	21,700	4,860	600	1,840	--	--	809	--	--	--	--
	11/23/99	777.30	0.00	23.78	753.52	39,300	20,700	5,080	632	2,130	--	--	280	--	--	--	--
	01/17/00	777.30	0.00	23.63	753.67	38,700	16,000	3,470	519	1,720	<5	<5	2,720	<25	<25	--	--
	04/05/00	777.30	0.00	23.16	754.14	39,800	20,400	4,300	594	1,670	<250	<250	1,880	<1250	<1250	--	--
	07/14/00	777.30	0.00	23.81	753.49	40,900	17,400	3,100	430	1,000	<500	<500	985	<2500	<2500	--	--
	10/13/00	777.30	0.00	24.04	753.26	52,500	23,000	3,300	475	1,085	<200	<200	1,430	<1000	<1000	--	--
	01/05/01	777.30	0.00	24.60	752.70	50,900	21,600	3,130	660	1,720	140	<100	6,260	<500	<500	--	--
	04/06/01	777.30	0.00	24.19	753.11	49,600	28,700	5,090	650	1,777	180	<100	2,380	<1000	<1000	--	--
	07/06/01	777.30	0.00	24.72	752.58	44,600	26,000	4,110	776	2,620	<200	<200	2,140	<1000	<1000	--	--
	10/23/01	777.30	0.00	24.84	752.46	50,700	19,600	2,830	553	1,590	<100	<100	219	<500	<500	--	--
	03/15/02	777.30	0.00	25.51	751.79	52,100	24,600	3,690	579	1,670	341	<100	392	<500	<500	--	--
	04/15/02	777.30	0.00	25.54	751.76	41,900	31,800	3,260	900	2,260	350	<200	3,760	<1000	<1000	--	--
	07/09/02	777.30	0.00	25.98	751.32	63,800	24,800	2,450	544	1,720	172	<100	2,320	<500	<500	--	--
	11/01/02	777.30	0.00	26.02	751.28	45,000	22,000	2,000	620	2,360	<200	<200	4,800	<1000	<1000	--	--
	01/31/03	777.30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	04/18/03	777.30	0.00	DRY	--	--	--	--	--	--	--	--	--	--	--	--	--
	07/23/03	777.30	0.00	DRY	--	--	--	--	--	--	--	--	--	--	--	--	--
12/02/03	777.30	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
02/17/04	777.30	0.00	DRY	--	--	--	--	--	--	--	--	--	--	--	--	--	
05/05/04	777.30	0.00	DRY	--	--	--	--	--	--	--	--	--	--	--	--	--	
08/03/04	777.30	0.00	DRY	--	--	--	--	--	--	--	--	--	--	--	--	--	
09/02/06	777.30	--	--	Well abandoned													
<b>MW-3A</b> ~10-45 screen	02/01/05	766.39	0.00	24.48	741.91	40,000	5,800	6,600	890	3,100	<400	<400	14,000	<400	3,600	--	--
	05/03/05	766.39	0.00	22.60	743.79	18,000	5,200	1,700	610	1,420	<200	<200	5,800	<200	<1000	--	--
	08/02/05	778.75	0.00	22.85	755.90	23,000	5,700	4,500	970	5,000	<200	<200	6,500	<200	2,800	--	--
	11/01/05	778.75	0.00	23.29	755.46	42,000	540	390	<500	3,200	<200	<200	16,000	<200	3,800	--	--
	01/30/06	778.75	0.00	23.81	754.94	4,700	650	1,200	200	780	<20	<20	840	<20	3,400	--	--
	05/23/06	778.75	0.00	23.85	754.90	42,000	2,900	2,400	620	2,100	<40	<40	2,600	<40	<200	--	--
	08/16/06	778.75	0.00	23.25	755.50	18,000	1,700	960	270	1,350	<100	<100	1,500	<100	<500	--	--
	11/01/06	778.75	0.00	23.85	754.90	20,000	2,200	1,700	260	1,390	<200	<200	2,700	<200	<1000	--	--
	01/31/07	778.75	0.00	23.40	755.35	14,000	3,300	1,100	220	980	<100	<100	1,700	<100	<500	--	--
	05/02/07	778.75	0.00	24.16	754.59	36,000	5,100	4,900	1,200	4,200	<200	<200	970	<200	<1000	--	--
	08/20/07	778.75	0.00	24.14	754.61	<10000	2,000	640	300	840	<200	<200	320	<200	<1000	--	--
	11/27/07	778.75	0.00	24.85	753.90	6,000	890	580	180	500	<100	<100	110	<100	<500	--	--
	02/26/08	778.75	0.00	24.70	754.05	29,000	3,900	4,800	990	4,500	<100	<100	<100	<100	&lt		

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
MW-3A	06/17/10	778.75	0.00	26.80	751.95	24,800	6470**	1,220	832	4,760	38.81	<25	100	<25	<250	--	--
	09/16/10	778.75	0.00	26.90	751.85	24,400	10300**	825	1,210	3,070	<50	<50	961	<50	<500	--	--
	12/09/10	778.75	0.00	27.58	751.17	4,420	3,800	50.8	<10	44.0	31.21	<20	134	32.21	<200	--	--
	02/24/11	778.75	0.00	26.85	751.90	73,600	16,400**	18,000**	1,670	12,100	52.2	<20	181	65.8	<200	--	--
	05/26/11	778.75	0.00	27.35	751.40	45,800	16,700	4,480	864	4,400	<200	<200	3541	<200	<2000	--	--
	12/08/11	778.75	0.00	27.44	751.31	106,000	22,000	5,000	780	3,100	<200	<200	240	<200	<2000	--	--
	02/11/12	778.75	--	--	--	Sampling Not required in 4Q11											
	05/17/12	778.75	0.00	29.09	749.66	96	2.4	2.0	1.8	6.6	1.1	<0.5	3.9	<1	7.8	<0.5	5.1
	11/19/12	778.75	0.00	25.95	752.80	55,400	4,900	9,100	1,400	15,000	<50	<50	<50	<50	<500	--	--
	09/12/13	778.75	0.95	29.43	750.03	39,000	22,000	4,300	1,400	5,200	59	<50	<50	<50	<500	--	--
	10/17/14	778.75	0.38	30.23	748.81	FPH	--	--	--	--	--	--	--	--	--	--	--
MW-4 screen unknown	01/17/00	778.08	0.00	18.83	759.25	<50	0.6	1.6	<0.5	2.0	<5	<5	<2.0	<25	<25	--	--
	04/05/00	778.08	0.00	18.69	759.39	61.0	3.2	9.0	2.0	13.7	<5	<5	5.9	<25	<25	--	--
	07/14/00	778.08	0.00	19.14	758.94	462	43	104	17	99	<250	<250	<100	<1250	<1250	--	--
	10/13/00	778.08	0.00	19.04	759.04	107	24	12	5	11.7	<2	<2	<2	<2	<10	--	--
	01/05/01	778.08	0.00	19.86	758.22	<50	<2	<2	<2	<2	<2	<2	2.5	<2	<10	--	--
	04/06/01	778.08	0.00	19.09	758.99	<50	<2	<2	<2	<2	<2	<2	<2	<2	<10	--	--
	07/06/01	778.08	0.00	19.34	758.74	<50	6.7	6.7	<2	7.8	<2	<2	<2	<2	<10	--	--
	10/23/01	778.08	0.00	19.60	758.48	<50	<1	<1	<1	<2	<2	<2	<2	<2	<10	--	--
	03/15/02	778.08	0.00	20.72	757.36	<50	<1	<1	<1	<2	<2	<2	<2	<2	<10	--	--
	04/15/02	778.08	0.00	20.84	757.24	<50	<1	<1	<1	<2	<2	<2	<2	<2	<10	--	--
	07/09/02	778.08	0.00	20.51	757.57	<50	<1	<1	<1	<2	<2	<2	<2	<2	<10	--	--
	11/01/02	778.08	0.00	20.49	757.59	<100	<0.5	<0.5	<0.5	<1	<2	<2	<2	<2	<10	--	--
	01/31/03	778.08	0.00	21.23	756.85	<100	<0.5	<0.5	<0.5	<1	<2	<2	<2	<2	<10	--	--
	04/18/03	778.08	0.00	20.28	757.80	<100	<0.5	<0.5	<0.5	<1	<2	<2	<2	<2	<10	--	--
	07/23/03	778.08	0.00	19.91	758.17	<100	<0.5	<0.5	<0.5	2.5	<2	<2	<2	<2	<10	--	--
	12/02/03	778.08	0.00	20.27	757.81	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	02/17/04	778.08	0.00	20.65	757.43	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/05/04	778.08	0.00	20.53	757.55	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/03/04	778.08	0.00	20.77	757.31	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	10/05/04	778.08	0.00	19.85	758.23	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	02/02/05	778.08	0.00	18.95	759.13	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/03/05	778.08	0.00	17.55	760.53	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/02/05	780.12	0.00	17.68	762.44	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/01/05	780.12	0.00	17.74	762.38	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/30/06	780.12	0.00	18.42	761.70	<100	<0.5	<0.5	<0.5	<1.5	<23	<2	<2	<2	<10	--	--
	05/23/06	780.12	0.00	19.10	761.02	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/16/06	780.12	0.00	19.18	760.94	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/01/06	780.12	0.00	18.76	761.36	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/31/07	780.12	0.00	19.85	760.27	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/02/07	780.12	0.00	20.34	759.78	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
08/20/07	780.12	0.00	20.89	759.23	<100	<0.5	0.65	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
11/27/07	780.12	0.00	20.81	759.31	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
02/26/08	780.12	0.00	20.81	759.31	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
05/21/08	780.12	0.00	21.21	758.91	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
08/12/08	780.12	0.00	21.46	758.66	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
11/05/08	780.12	0.00	21.53	758.59	--	--	--	--	--	--	--	--	--	--	--	--	
01/14/09	780.12	0.00	21.48	758.64	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
07/16/09	780.12	0.00	22.49	757.63	240	119	48.5	12.1	33.1	<1	<1	<1	<1	<10	--	--	
11/19/12	780.12	--	--	--	Sampling Not required in 4Q12												
09/12/13	780.12	--	--	--	Sampling Not required in 3Q13												
10/17/14	780.12	--	--	--	Sampling Not required in 4Q14												
MW-5 screen unknown	03/15/02	772.19	0.00	19.40	752.79	14,400	510	31.6	271	1,840	40.2	<20	36.7	<20	<100	--	--
	04/15/02	772.19	0.00	19.41	752.78	12,000	498	30	116	1,780	37.0	<20	<20	<20	<100	--	--
	07/09/02	772.19	0.00	19.71	752.48	12,500	392	160	196	1,430	42.1	<20	212	<20	<100	--	--
	11/01/02	772.19	0.00	19.87	752.32	16,000	260	13.0	160	1,695	<20	<20	<20	<20	<100	--	--
	01/31/03	772.19	0.00	22.02	750.17	16,000	250	18.0	130	950	<20	<20	<20	<20	<100	--	--
	04/18/03	772.19	0.00	19.00	753.19	18,000	410	20.0	250	1,670	20.0	<4	<4	<4	<20	--	--
	07/23/03	772.19	0.00	18.87	753.32	27,000	360	12.0	230	1,263	18.0	<10	<10	<10	<50	--	--
	12/02/03	772.19	--	--	--	11,000	300	18.0	160	1,400	18.0	<10	<10	<10	<50	--	--
	02/17/04	772.19	0.00	19.94	752.25	7,200	210	11.0	130	792	14.0	<10	<10	<10	<50	--	--
	05/05/04	772.19	0.00	19.60	752.59	11,000	110	7.8	91	685	6.2	<2	<2	<2	<10	--	--
	08/03/04	772.19	0.00	19.97	752.22	7,500	120	8.9	91	526	<20	<20	<20	<20	<100	--	--
	10/05/04	772.19	0.00	20.02	752.17	10,000	190	13.0	160	832	17.0	<10	<10	<10	<50	--	--
	02/01/05	772.19	0.00	18.47	753.72	2,900	120	11.0	74	455	7.21	<10	<10	<10	<50	--	--
	05/03/05	772.19	0.00	17.30	754.89	5,400	190	9.9	100	551	<10	<10	<10	<10	<50	--	--
	08/02/05	774.32	0.00	17.37	756.95	1,700	67.0	8.5	48.0	207	<10	<10	<10	<10	<50	--	--
	11/01/05	774.32	0.00	17.63	756.69	3,200	100	6.6	67.0	307	2.9	<2	<2	<2	<10	--	--
	01/30/06	774.32	0.00	17.85	756.47	2,600	130	7.4	73.0	372	5.5	<2	<2	<2	<10	--	--
	05/23/06	774.32	0.00	17.96	756.36	2,500	93.0	3.4	47.0	200	4.0	<2	<2	<2	<10	--	--
	08/16/06																

**TABLE 4**  
**CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA**  
**COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**  
**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
MW-5	11/19/12	774.32	--	--	--	Sampling Not required in 4Q12											
	09/12/13	774.32	--	--	--	Sampling Not required in 3Q13											
	10/17/14	774.32	--	--	--	Sampling Not required in 4Q14											
MW-6 ~15-45 screen	01/17/00	773.40	0.00	21.93	751.47	19,300	2,200	4,620	464	4,150	<5	<5	146	<25	189	--	--
	04/05/00	773.40	0.00	21.44	751.96	2,960	281	813	144	471	<50	<50	377	<50	<230	--	--
	07/14/00	773.40	0.00	22.10	751.30	1,400	10	40	15	105	210	<5	555	<25	250	--	--
	10/13/00	773.40	0.00	22.49	750.91	2,600	164	17	45	65	223	<2	718	<2	322	--	--
	01/05/01	773.40	0.00	22.66	750.74	3,350	259	19	78	68.80	233	<2	923	<2	144	--	--
	04/06/01	773.40	0.00	22.08	751.32	2,630	71.5	10	14	26	311	<4	1,990	<4	225	--	--
	07/06/01	773.40	0.00	22.74	750.66	2,750	73.4	17	16	55.3	301	<4	1,390	<4	225	--	--
	10/23/01	773.40	0.00	23.20	750.20	2,990	38.2	35.0	22.1	97.7	277	<10	1,590	<10	285	--	--
	03/15/02	773.40	0.00	23.61	749.79	4,200	242	38.3	59.3	113	259	<10	1,660	<10	203	--	--
	04/15/02	773.40	0.00	23.57	749.83	3,040	147	70.2	36.1	231	354	<20	2,540	<20	<100	--	--
	07/09/02	773.40	0.00	23.91	749.49	3,800	90	23.6	28.0	158	203	<20	1,860	<20	300	--	--
	11/01/02	773.40	0.00	24.17	749.23	2,600	280	140	68.0	281	220	<20	2,700	<20	600	--	--
	01/31/03	773.40	0.00	24.11	749.29	2,200	30.0	24.0	11.0	59.0	280	<40	2,500	<40	820	--	--
	04/18/03	773.40	0.00	23.07	750.33	5,600	650	140	150	306	270	<20	3,700	<20	890	--	--
	07/23/03	773.40	0.00	23.53	749.87	6,400	46.0	29.0	16.0	94.0	310	<20	5,900	<20	630	--	--
	12/02/03	773.40	0.00	24.27	749.13	5,700	12.0	10.0	<5	34.0	290	<20	5,200	<20	950	--	--
	02/17/04	773.40	0.00	24.37	749.03	3,000	11.0	9.0	<5	23.0	270	<20	3,800	<20	1,200	--	--
	05/05/04	773.40	0.00	24.03	749.37	5,300	55.0	16.0	19.0	47.0	280	<40	4,000	<40	<200	--	--
	08/03/04	773.40	0.00	24.53	748.87	3,000	170	36.0	39.0	20.0	490	<40	2,400	<40	5,300	--	--
	10/05/04	773.40	0.00	24.74	748.66	3,000	75.0	22.0	18.0	28.0	570	<20	2,700	<20	8,100	--	--
	02/01/05	773.40	0.00	22.95	750.45	4,400	370	290	96.0	440	180	1.2J	820	2.3	2,000	--	--
	05/03/05	773.40	0.00	22.18	751.22	9,100	1,700	1,100	360	940	350	<40	2,300	<40	6,700	--	--
	08/02/05	775.46	0.00	22.48	752.98	5,900	250	260	97.0	320	110	<40	2,600	<40	5,400	--	--
	11/02/05	775.46	0.00	22.63	752.83	7,400	260	310	70.0	430	160	<20	2,600	<20	16,000	--	--
	01/30/06	775.46	0.00	22.86	752.60	2,800	160	33	39.0	129	130	<20	2,500	<20	33,000	--	--
	05/23/06	775.46	0.00	22.67	752.79	1,200	340	390	140	570	230	<100	1,600	<100	52,000	--	--
	08/16/06	775.46	0.00	22.21	753.25	38,000	2,300	3,100	1,100	4,400	<200	<200	5,700	<200	<1000	--	--
	11/01/06	775.46	0.00	23.03	752.43	<10000	<50	<50	<50	<150	<200	<200	1,700	<200	49,000	--	--
	01/31/07	775.46	0.00	22.80	752.66	<10000	82	<50	<50	<150	<200	<200	1,200	<200	24,000	--	--
	05/02/07	775.46	0.00	22.92	752.54	2,100	110	40.0	37.0	113	140	<20	790	<20	25,000	--	--
	08/20/07	775.46	0.00	23.20	752.26	15,000	1,100	590	460	1,990	<200	6,700	<200	30,000	--	--	
	11/27/07	775.46	0.00	23.53	751.93	2,200	160	22.0	27.0	68.0	170	<2	120	<2	39,000	--	--
	02/26/08	775.46	0.00	23.29	752.17	1,800	160	130	60.0	165	170	<20	350	<20	36,000	--	--
	05/21/08	775.46	0.00	23.55	751.91	1,600	160	67.0	55.0	111	150	<20	230	<20	43,000	--	--
	08/12/08	775.46	0.00	24.15	751.31	5,900	180	92.0	70.0	192	140	<100	260	<100	41,000	--	--
	11/05/08	775.46	0.00	24.66	750.80	880	43.0	18.0	20.0	55	70	<10	85	<10	21,000	--	--
	01/14/09	775.46	0.00	24.50	750.96	<1000	66.0	33.0	37.0	95	140	<20	90	<20	18,000	--	--
	07/16/09	775.46	0.00	24.99	750.47	1,270	122	6.6	16.7	12.4	98.6	<5	142	<5	19700**	--	--
	10/29/09	775.46	0.32	25.94	749.76	FPH	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	775.46	0.30	26.15	749.54	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/17/10	775.46	0.00	25.49	749.97	21,400	171	528	21.8	4,090	39.0	<10	43.0	<10	9,130	--	--
	09/16/10	775.46	0.00	25.90	749.56	36,300	511	1,450	478	11,400	42.5J	<25	140	<25	8,070	--	--
	12/09/10	775.46	0.00	26.56	748.90	14,900	164	303	<10	3,600	20.0J	<20	97.4	<20	8,820	--	--
	02/24/11	775.46	0.00	25.37	750.09	34,400	138	240	49.2	7,950	<20	<20	43.2	<20	4,720	--	--
	05/26/11	775.46	0.00	25.44	750.02	2,300	43.1	7.9	12.8	43.1	<2	<2	23.2	<2	<20	--	--
12/08/11	775.46	0.00	26.22	749.24	979	9.7	9.8	14	120	96	<05	5	<0.5	10,000	--	--	
02/11/12	775.46	--	--	--	--	Sampling Not required in 1Q12											
05/17/12	775.46	0.00	26.11	749.35	2,300	13	6.1	23	300	55	<1	6.3	<1	2,000	18	3.8	
11/19/12	775.46	0.00	26.56	748.90	6,390	<5	<5	<5	1,600	48	<5	<5	<5	3,700	--	--	
09/12/13	775.46	0.00	27.36	748.10	130	<0.5	<0.5	<0.5	<0.5	63	1.3	8.2	<0.5	5,900	--	--	
10/17/14	775.46	0.00	28.51	746.95	99.2	<0.5	<0.5	<0.5	<0.5	66	1.5	4.2	<0.5	4,100	--	--	
MW-7 ~15-45 screen	01/17/00	778.95	0.00	23.47	755.48	33,000	1,850	7,630	1,430	6,060	<5	<5	<25	<25	<25	--	--
	04/05/00	778.95	0.00	23.42	755.53	40,400	6,000	13,600	1,610	7,650	<250	<250	<100	<250	<1250	--	--
	07/14/00	778.95	0.00	23.99	754.96	57,100	5,650	10,500	1,900	10,150	<250	<250	<100	<250	<1250	--	--
	10/13/00	778.95	0.00	24.33	754.62	58,800	13,700	14,600	1,570	8,650	<100	<100	<100	<100	<500	--	--
	01/05/01	778.95	0.00	24.97	753.98	81,100	19,800	24,300	2,940	14,820	120	<100	<100	<100	<500	--	--
	04/06/01	778.95	0.00	24.54	754.41	68,000	20,300	26,100	2,730	14,720	120	<100	<100	<100	<500	--	--
	07/06/01	778.95	0.00	25.07	753.88	90,300	22,300	31,400	3,890	21,580	<200	<200	<200	<200	<1000	--	--
	10/23/01	778.95	0.00	24.60	754.35	76,300	12,100	17,800	2,360	11,500	145	<100	136	<100	699	--	--
	03/15/02	778.95	0.00	25.61	753.34	74,200	16,200	21,900	2,360	12,600	135	<100	199	<100	<500	--	--
	04/15/02	778.95	0.00	25.79	753.16	118,000	30,800	38,500	3,960	22,600	226	<100	<100	<100	<500	--	--
	07/09/02	778.95	0.00	26.27	752.68	74,900	16,300	21,300	1,990	12,000	102	<100	<100	<100	<500	--	--
	11/01/02	778.95	0.00	26.09	752.86	130,000	19,000	34,000	3,100	19,900	<400	<400	<400	<400	<2000	--	--
	01/31/03	778.95	0.00	25.64	753.31	130,000	15,000	18,000	3,000	15,800	<400	<400	<400	<400	<20000	--	--
	04/18/03	778.95	Sheen	25.27	753.68	--	--	--	--	--	--	--	--	--	--	--	--
	07/23/03	778.95	Sheen	24.19	754.76	--	--	--	--	--	--	--	--	--	--	--	--
	12/02/03	778.95	0.00	25.99	752.96	170,000	17,000	24,000	3,300	18,							

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014  
Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)	
MW-7	11/01/06	780.96	0.00	24.11	756.85	72,000	12,000	8,600	1,400	5,300	<1000	<1000	<1000	<1000	<5000	--	--	
	01/31/07	780.96	0.00	24.16	756.80	37,000	6,400	7,600	1,000	4,500	<400	<400	<400	<400	<2000	--	--	
	05/02/07	780.96	0.00	24.35	756.61	27,000	4,900	4,100	760	3,200	<200	<200	<200	<200	<1000	--	--	
	08/20/07	780.96	0.00	25.03	755.93	130,000	22,000	28,000	3,300	14,400	<200	<200	<200	<200	<1000	--	--	
	11/27/07	780.96	0.00	25.15	755.81	120,000	14,000	25,000	2,600	13,700	<1000	<1000	<1000	<1000	<5000	--	--	
	02/26/08	780.96	0.00	25.22	755.74	28,000	5,200	4,200	840	4,200	<400	<400	<400	<400	<2000	--	--	
	05/21/08	780.96	0.00	25.53	755.43	60,000	12,000	10,000	1,900	9,400	<200	<200	<200	<200	<1000	--	--	
	08/12/08	780.96	0.00	25.70	755.26	17,000	3,000	2,600	640	3,300	<100	<100	<100	<100	<500	--	--	
	11/05/08	780.96	0.00	25.87	755.09	--	--	--	--	--	--	--	--	--	--	--	--	
	01/14/09	780.96	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	07/16/09	780.96	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	10/29/09	780.96	0.10	28.25	752.79	FPH	--	--	--	--	--	--	--	--	--	--	--	
	01/14/10	780.96	0.12	27.82	753.23	FPH	--	--	--	--	--	--	--	--	--	--	--	
	02/10/10	781.66	0.70	28.07	754.12	FPH	--	--	--	--	--	--	--	--	--	--	--	
	03/31/10	781.66	0.45	27.58	754.42	FPH	--	--	--	--	--	--	--	--	--	--	--	
	04/08/10	781.66	0.32	27.53	754.37	FPH	--	--	--	--	--	--	--	--	--	--	--	
	04/15/10	781.66	0.34	27.62	754.30	FPH	--	--	--	--	--	--	--	--	--	--	--	
	04/20/10	781.66	0.43	27.72	754.26	FPH	--	--	--	--	--	--	--	--	--	--	--	
	05/03/10	781.66	0.58	27.97	754.13	FPH	--	--	--	--	--	--	--	--	--	--	--	
	05/12/10	781.66	0.57	27.90	754.19	FPH	--	--	--	--	--	--	--	--	--	--	--	
	05/20/10	781.66	0.46	27.71	754.30	FPH	--	--	--	--	--	--	--	--	--	--	--	
	05/25/10	781.66	0.52	27.83	754.22	FPH	--	--	--	--	--	--	--	--	--	--	--	
	06/03/10	781.66	0.41	27.72	754.25	FPH	--	--	--	--	--	--	--	--	--	--	--	
	06/08/10	781.66	1.09	28.31	754.17	FPH	--	--	--	--	--	--	--	--	--	--	--	
	06/15/10	781.66	0.90	28.08	754.26	FPH	--	--	--	--	--	--	--	--	--	--	--	
	06/17/10	781.66	0.00	27.35	754.31	196,000	20,300	27,000	6,530	30,600	<400	<400	<400	<400	<4,000	--	--	
	06/22/10	781.66	1.25	28.53	754.07	FPH	--	--	--	--	--	--	--	--	--	--	--	
	06/30/10	781.66	1.13	28.41	754.10	FPH	--	--	--	--	--	--	--	--	--	--	--	
	09/16/10	781.66	Connected to DPE System		--	--	--	--	--	--	--	--	--	--	--	--	--	
	12/08/10	781.66	0.31	28.33	753.56	FPH	--	--	--	--	--	--	--	--	--	--	--	
	02/23/11	781.66	Connected to DPE System		--	--	--	--	--	--	--	--	--	--	--	--	--	
	05/26/11	781.66	Connected to DPE System		--	--	--	--	--	--	--	--	--	--	--	--	--	
	12/10/11	781.66	0.13	28.21	753.55	FPH	--	--	--	--	--	--	--	--	--	--	--	
	02/11/12	781.66	0.29	29.48	752.40	Sampling Not required in 1Q12		--	--	--	--	--	--	--	--	--	--	
	05/17/12	781.66	0.00	28.61	753.05	169,000	8,000	6,500	2,800	18,000	<200	<200	<200	<200	<2000	<200	4.2	
	11/19/12	781.66	--	--	--	Sampling Not required in 4Q12		--	--	--	--	--	--	--	--	--	--	
	09/14/13	781.66	0.11	29.38	752.36	FPH	--	--	--	--	--	--	--	--	--	--	--	
	10/17/14	781.66	--	--	--	No Access - Not gauged or sampled		--	--	--	--	--	--	--	--	--	--	
	MW-8 ~10-40 screen	01/17/00	773.41	0.00	21.09	752.32	9,760	1,300	1,550	137	1490	<5	<5	<10	<25	53	--	--
		04/05/00	773.41	0.00	20.62	752.79	2,410	709	495	72.8	306	<12.5	<12.5	41	<12.5	104	--	--
		07/14/00	773.41	0.00	21.24	752.17	1,100	267	59	21.0	125	69	<5	23	<5	106	--	--
		10/13/00	773.41	0.00	21.64	751.77	793	163	18	6.2	21.4	82	<2	23	<2	110	--	--
		01/05/01	773.41	0.00	21.88	751.53	1,400	356	16.5	76	13	78.5	<2	27	<2	60	--	--
		04/06/01	773.41	0.00	21.37	752.04	479	50.6	3.7	16.2	<2	75	<2	17.7	<2	26	--	--
		07/06/01	773.41	0.00	22.90	750.51	343	30.2	3.5	3.7	3.5	84.3	<2	21.2	<2	64	--	--
		10/23/01	773.41	0.00	22.34	751.07	224	62.6	2.2	25.5	<2	65	<2	26.2	<2	84.9	--	--
		03/15/02	773.41	0.00	22.80	750.61	1,500	754	35.6	71.2	28.8	92	<2	60.0	<2	189	--	--
		04/15/02	773.41	0.00	22.78	750.63	2,030	738	296	104	230	90	<10	43.7	<10	<50	--	--
07/09/02		773.41	0.00	23.12	750.29	356	19.9	5.5	4.2	5.3	42.7	<2	22.3	<2	46.5	--	--	
11/01/02		773.41	0.00	23.42	749.99	750	220	54.0	34.0	67.0	25.0	<2	16.0	<2	82.0	--	--	
01/31/03		773.41	0.00	23.23	750.18	2,000	420	71.0	51.0	84.0	55.0	<4	31.0	<4	79.0	--	--	
04/18/03		773.41	0.00	22.33	751.08	700	150	22.0	22.0	43.0	65.0	<4	54.0	<4	110	--	--	
07/23/03		773.41	0.00	22.62	750.79	420	38.0	4.6	3.9	12.6	49.0	<2	43.0	<2	61.0	--	--	
12/02/03		773.41	0.00	23.33	750.08	1,900	360	220	30.0	132	41.0	<2	31.0	<2	52.0	--	--	
02/17/04		773.41	0.00	23.47	749.94	1,800	370	200	34.0	144	40.0	<2	32.0	<2	37.0	--	--	
05/05/04		773.41	0.00	23.11	750.30	2,300	450	220	31.0	155	20.0	<2	18.0	<2	<10	--	--	
08/03/04		773.41	0.00	23.55	749.86	5,000	1,500	810	150	590	44.0	<10	<10	<10	<50	--	--	
10/05/04		773.41	0.00	23.74	749.67	4,500	1,400	740	120	470	54.0	<20	<20	<20	<100	--	--	
02/02/05		773.41	0.00	22.10	751.31	1,900	570	310	42.0	198	13.0	<20	7.3	<20	<100	--	--	
05/03/05		773.41	0.00	20.86	752.55	2,000	740	370	82.0	180	22.0	<20	<20	<20	<100	--	--	
08/02/05		775.49	0.00	21.52	753.97	1,100	67.0	97.0	18.0	66.0	<2	<2	<2	<2	<10	--	--	
11/02/05		775.49	0.00	21.94	753.55	270	85.0	15.0	3.4	17.2	20.0	<2	7.8	<2	<10	--	--	
01/30/06		775.49	0.00	21.91	753.58	220	65.0	25.0	5.7	31.0	17.0	<2	6.9	<2	<10	--	--	
05/23/06		775.49	0.00	21.97	753.52	850	140	76.0	19.0	75.0	40.0	<2	4.4	<2	30	--	--	
08/16/06		775.49	0.00	21.60	753.89	120	4.8	<0.5	<0.5	<1.5	9.8	<2	5.2	<2	<10	--	--	
11/01/06		775.49	0.00	22.15	753.34	<100	16.0	<0.5	<0.5	<1.5	16.0	<2	14	<2	<10	--	--	
01/31/07		775.49	0.00	22.05	753.44	<100	4.8	<0.5	<0.5	<1.5	4.9	<2	2.4	<2	<10	--	--	
05/02/07		775.49	0.00	22.20	753.29	<100	<0.5	<0.5	<0.5	<1.5	18.0	<2	9.9	<2	<10	--	--	
08/20/07		775.49	0.00	22.67	752.82	380	91.0	2.1	2.5	26.5	10.0	<2	6.9	<2	<10	--	--	
11/27/07		775.49	0.00	22.80	752.69	160	18.0	2.3	4.3	17.36	12.0	<2	8.3	<2	<10	--	--	
02/26/08		775.49	0.00	22.57	752.92	<100	5.5	<0.5	<0.5	<1.5	4.6	<2	6.7	<2	<10	--	--	
05/21/08		775.49	0.00	22.80	752.69	<100	1.9	<0.5	<0.5	<1.5	3.5	<2	4.5	<2	<10	--	--	
08/12/08		775.49	0.00	23.31	752.18	<100	0.82	<0.5	<0.5	<1.5	3.2	<2	3.2	<2	<10	--	--	
11/05/08		775.49	0.00	23.80	751.69	100	28.0	10.0	3.0	18.9	10.0	<2	14	<2	59	--	--	
01/14/09		775.49	0.00	23.81	751.68	140	26.0	<0.5	2.0	4.4	16.0	<2	18	<2	<10	--	--	
07/16/09		775.49	0.00	24.28	751.21	467	110	69.8	16.2	92.0	<1	<1	4.4	<1	<10	--	--	
10/29/09		775.49	0.00	24.95	750.54	--	--	--	--	--	--	--	--	--	--	--	--	
01/14/10		775.49	0.00	25.25	750.24	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--	
06/17/10	775.49	0.00	24.70	750.79	427	13.4	1.9	5.2	54.8	<1	<1	1.4	<1	<10	--	--		
09/16/10	775.49	0.00	24.18	751.31	131	<0.5	<0.5	<0.5	32.1	<1	<1	19	<1	<10	--	--		
12/09/10	775.49	0.00	25.57	749.92	1,070	2.5	3.9	<0.5	202	<1	<1	5.5	<1	<10	--	--		
02/24/11	775.49	0.00	24.55	750.94	1,370	41.8	3.9	4.1	6.9	<1	<1	2.2	<1	<10	--	--		

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014  
Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
<b>MW-8</b>	05/26/11	775.44	0.00	24.61	750.83	87J	4.6	4.5	3.1	12.9	12.6	<1	4.7	<1	<10	--	--
	12/08/11	775.44	0.00	25.43	750.01	724	38	31	20	98	6.1	<0.5	1.8	<0.5	6.6	--	--
	02/11/12	775.44	--	--	--	Sampling Not required in 1Q12											
	05/17/12	775.44	0.00	25.53	749.91	6,660	95	150	54	2,100	11	<5	<5	<5	<50	<5	4.6
	11/19/12	775.44	0.00	26.03	749.41	<50	0.8	<0.5	<0.5	0.9	15	<0.5	6.6	<0.5	<5	--	--
	09/12/13	775.44	0.00	27.03	748.41	<50	2.7	<0.5	<0.5	<0.5	4.3	<0.5	0.8	<0.5	5.3	--	--
	10/17/14	<b>775.44</b>	<b>0.00</b>	<b>27.88</b>	<b>747.56</b>	<b>&lt;50</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>1.9</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>7.3</b>	--	--
	<b>MW-9</b> ~10-35 screen	03/15/02	773.02	0.00	22.41	750.61	18,000	272	680	770	3,290	<40	<40	<40	<40	<200	--
04/15/02		773.02	0.00	22.40	750.62	18,500	14.0	287	1,100	2,860	<20	<20	<20	<20	<100	--	--
07/09/02		773.02	0.00	22.73	750.29	10,100	18.0	31.0	590	670	<20	<20	176	<20	<100	--	--
11/01/02		773.02	0.00	23.04	749.98	17,000	<5	72.0	<0.5	2,950	<20	<20	<20	<20	<100	--	--
01/31/03		773.02	0.00	23.05	749.97	23,000	4.9	110	1,300	1,830	<10	<10	<10	<10	<50	--	--
04/18/03		773.02	0.00	22.00	751.02	9,100	<2.5	9.9	800	122	<10	<10	<10	<10	<50	--	--
07/23/03		773.02	0.00	22.23	750.79	15,000	<2.5	15.0	1,200	168	<10	<10	<10	<10	<50	--	--
12/02/03		773.02	0.00	22.96	750.06	18,000	<2.5	17.0	1,300	3,100	<10	<10	<10	<10	<50	--	--
02/17/04		773.02	0.00	23.12	749.90	1,600	<5	85.0	1,200	2,020	<20	<20	<20	<20	<100	--	--
05/05/04		773.02	0.00	22.72	750.30	20,000	<5	20.0	790	1,070	<20	<20	<20	<20	<100	--	--
08/03/04		773.02	0.00	23.16	749.86	8,000	<5	11.0	590	580	<20	<20	<20	<20	<100	--	--
10/05/04		773.02	0.00	23.34	749.68	4,300	<2.5	<2.5	250	112	<10	<10	<10	<10	<50	--	--
02/04/05		773.02	0.00	21.19	751.83	2,200	<2.5	<2.5	220	130	<10	<10	<10	<10	<50	--	--
05/03/05		773.02	0.00	20.72	752.30	5,500	<0.5	2.7	460	191	<3	<2	<2	<2	<10	--	--
08/02/05		775.11	0.00	21.52	753.59	390	<0.5	0.74	19.0	29.0	<2	<2	<2	<2	<10	--	--
11/01/05		775.11	0.00	21.81	753.30	4,000	<0.5	4.0	180	235	<2	<2	<2	<2	<10	--	--
01/30/06		775.11	0.00	21.87	753.24	530	<0.5	0.60	52.0	46.0	<2	<2	<2	<2	<10	--	--
05/23/06		775.11	0.00	21.80	753.31	3,700	<0.5	4.0	220	259	<2	<2	<2	<2	<10	--	--
08/16/06		775.11	0.00	20.49	754.62	6,800	<2.5	7.6	290	330	<10	<10	<10	<10	<50	--	--
11/01/06		775.11	0.00	22.06	753.05	1,400	<1	2.5	53	38.7	<4	<4	<4	<4	<20	--	--
01/31/07		775.11	0.00	21.54	753.57	4,500	<0.5	3.5	160	147	<2	<2	<2	<2	<10	--	--
05/02/07		775.11	0.00	22.09	753.02	1,400	<2.5	7.0	140	72.0	<10	<10	<10	<10	<50	--	--
08/20/07		775.11	0.00	22.50	752.61	890	<0.5	<0.5	13	57.0	<2	<2	<2	<2	<10	--	--
11/27/07		775.11	0.00	22.70	752.41	4,800	<5	<5	210	24.0	<20	<20	<20	<20	<100	--	--
02/26/08		775.11	0.00	22.52	752.59	620	<0.5	<0.5	23.0	7.1	<2	<2	<2	<2	<10	--	--
05/21/08		775.11	0.00	22.78	752.33	1,200	<5	1.4	85.0	122	<2	<2	<2	<2	<10	--	--
08/12/08		775.11	0.00	23.26	751.85	1,400	<0.5	0.67	59.0	55.7	<2	<2	<2	<2	<10	--	--
11/05/08		775.11	0.00	23.79	751.32	920	<0.5	<0.5	39.0	45	<2	<2	<2	<2	39	--	--
01/14/09		775.11	0.00	23.71	751.40	1,300	<0.5	<0.5	49.0	28.89	<2	<2	<2	<2	<10	--	--
07/16/09		775.11	0.00	24.25	750.86	832	18.8	2.0	13.9	6.6	<1	<1	<1	<1	<10	--	--
10/29/09		775.11	0.00	24.80	750.31	1,410	0.7J	3.1	15.3	22.5	<1	<1	<1	<1	<10	--	--
01/14/10		775.11	0.00	25.15	749.96	601	8.8	28.5	<0.5	56.5	<1	<1	<1	<1	<10	--	--
06/17/10	775.11	0.00	24.66	750.45	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--	
09/16/10	775.11	0.00	25.14	749.97	132	0.6J	<0.5	0.6J	11.6	1.5J	<1	2.9	<1	<10	--	--	
12/09/10	775.11	0.00	25.54	749.57	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--	
02/24/11	775.11	0.00	24.43	750.68	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--	
05/26/11	775.11	0.00	24.48	750.63	214	4.4	4.3	4.0	15.0	<1	<1	<1	<1	<10	--	--	
12/08/11	775.11	--	--	--	--	Sampling Not required in 4Q11											
02/11/12	775.11	--	--	--	--	Sampling Not required in 1Q12											
05/17/12	775.11	0.00	25.22	749.89	89.2	1.0	4.0	2.8	12	<0.5	<0.5	3.1	<0.5	11	<0.5	4.2	
11/19/12	775.11	0.00	26.00	749.11	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
09/12/13	775.11	0.00	26.64	748.47	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
10/17/14	<b>775.11</b>	<b>0.00</b>	<b>27.79</b>	<b>747.32</b>	<b>&lt;50</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;5</b>	--	--
<b>MW-10</b> ~15-45 screen	03/15/02	767.31	0.00	17.69	749.62	1,150	51.8	24.7	14.5	52.2	51.8	<2	74.4	<2	38.3	--	--
	04/15/02	767.31	0.00	17.67	749.64	7,350	735	467	185	519	71.0	<20	61.9	<20	<100	--	--
	07/09/02	767.31	0.00	17.97	749.34	4,260	704	113	90.0	125	35.0	<20	77.0	<20	191	--	--
	11/01/02	767.31	0.00	18.31	749.00	780	63.0	4.7	7.8	16.2	60.0	<2	78.0	<2	130	--	--
	01/31/03	767.31	0.00	18.24	749.07	380	1.2	<0.5	0.97	<1	<2	<2	78.0	<2	110	--	--
	04/18/03	767.31	0.00	17.18	750.13	560	24.0	1.3	8.0	3.8	54.0	<2	110	<2	120	--	--
	07/23/03	767.31	0.00	17.85	749.46	600	72.0	3.6	19.0	3.73	58.0	<2	110	<2	92.0	--	--
	12/02/03	767.31	0.00	19.32	747.99	440	64.0	2.0	16.0	1.5	54.0	<2	110	<2	47.0	--	--
	02/17/04	767.31	0.00	18.44	748.87	410	40.0	0.61	11.0	<1.5	59.0	<2	150	<2	18.0	--	--
	05/05/04	767.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	08/03/04	767.31	0.00	18.64	748.67	550	110	0.57	26.0	<1.5	85.0	<2	160	<2	<10	--	--
	10/05/04	767.31	0.00	18.93	748.38	410	30	<0.5	4.6	<1.5	83.0	<2	140	<2	66.0	--	--
	02/01/05	767.31	0.00	17.07	750.24	1,000	230	90.0	43.0	81.0	36.0	<20	88.0	<20	<100	--	--
	05/03/05	767.31	0.00	16.37	750.94	2,200	980	80.0	160	76.0	72.0	<2	62.0	<2	<10	--	--
	08/02/05	769.36	0.00	16.73	752.63	540	300	7.7	47	25.4	39.0	<4	73.0	<4	30.0	--	--
	11/01/05	769.36	0.00	17.01	752.35	1,800	420	3.3	71.0	15.5	47.0	<2	160	17.0	27.0	--	--
	01/30/06	769.36	0.00	17.02	752.34	380	110	1.6	12.0	15.7	29.0	<2	150	<2	20.0	--	--
	05/23/06	769.36	0.00	16.88	752.48	510	100	0.57	15.0	2.0	33.0	<2	100	<2	22.0	--	--
	08/16/06	769.36	0.00	16.95	752.41	310	0.86	<0.5	1.2	<1.5	30.0	<2	130	<2	<10	--	--



**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
MW-12	05/26/11	772.07	0.00	20.11	751.96	--	--	--	--	--	--	--	--	--	--	--	--
	12/08/11	772.07	--	--	--	Sampling Not required in 4Q11	--	--	--	--	--	--	--	--	--	--	--
	02/11/12	772.07	--	--	--	Sampling Not required in 1Q12	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	772.07	--	--	--	Sampling Not required in 2Q12	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	772.07	0.00	22.95	749.12	Sampling Not required in 4Q12	--	--	--	--	--	--	--	--	--	--	--
	09/12/13	772.07	--	--	--	Sampling Not required in 3Q13	--	--	--	--	--	--	--	--	--	--	--
	10/18/14	772.07	--	--	--	Sampling Not required in 4Q14	--	--	--	--	--	--	--	--	--	--	--
MW-13 ~10-35 screen	12/02/05	782.45	0.00	19.09	763.36	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/30/06	782.45	0.00	19.79	762.66	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/23/06	782.45	0.00	20.52	761.93	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/16/06	782.45	0.00	20.56	761.89	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/01/06	782.45	0.00	20.07	762.38	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/31/07	782.45	0.00	21.32	761.13	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/02/07	782.45	0.00	21.82	760.63	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/20/07	782.45	0.00	22.38	760.07	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/27/07	782.45	0.00	22.21	760.24	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	02/26/08	782.45	0.00	22.27	760.18	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/21/08	782.45	0.00	22.77	759.68	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/12/08	782.45	0.00	22.90	759.55	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/05/08	782.45	0.00	22.81	759.64	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/09	782.45	0.00	22.73	759.72	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	07/16/09	782.45	0.00	23.95	758.50	<50	16.4	0.81	3.1	2.5	<1	<1	<1	<1	<10	--	--
	10/29/09	782.45	0.00	24.15	758.30	100	14.5	12.4	2.3	21.4	<1	<1	<1	<1	<10	--	--
	01/14/10	782.45	0.00	24.13	758.32	283	24.3	24.5	7.5	50.3	<1	<1	<1	<1	<10	--	--
	06/17/10	782.45	0.00	23.30	759.15	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
	09/16/10	782.45	0.00	23.57	758.88	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
	12/08/10	782.45	0.00	23.93	758.52	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
	02/23/11	782.45	0.00	22.87	759.58	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	--
05/27/11	782.45	0.00	23.15	759.30	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	--	
12/10/11	782.45	0.00	23.53	758.92	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	<0.5	--	
02/11/12	782.45	0.00	24.00	758.45	Sampling Not required in 1Q12	--	--	--	--	--	--	--	--	--	--	--	--
05/17/12	782.45	--	--	--	Sampling Not required in 2Q12	--	--	--	--	--	--	--	--	--	--	--	--
11/19/12	782.45	0.00	24.81	757.64	Sampling Not required in 4Q12	--	--	--	--	--	--	--	--	--	--	--	--
09/12/13	782.45	--	--	--	Sampling Not required in 3Q13	--	--	--	--	--	--	--	--	--	--	--	--
10/18/14	782.45	0.00	26.66	755.79	Sampling Not required in 4Q14	--	--	--	--	--	--	--	--	--	--	--	--
MW-14 ~10-35 screen	12/02/05	783.48	0.00	25.33	758.15	120,000	1,900	38,000	3,300	17,600	<100	<100	<100	<100	<500	--	--
	01/30/06	783.48	0.00	25.77	757.71	210,000	1,900	36,000	4,200	26,600	<1000	<1000	<1000	<1000	<5000	--	--
	05/23/06	783.48	0.00	26.30	757.18	39,000	360	7,900	580	3,800	<100	<100	<100	<100	<500	--	--
	08/16/06	783.48	0.00	25.66	757.82	65,000	710	12,000	890	5,900	<200	<200	<200	<200	<1000	--	--
	11/01/06	783.48	0.00	25.44	758.04	9,800	120	2,300	220	1,300	<40	<40	<40	<40	<200	--	--
	01/31/07	783.48	0.00	25.45	758.03	17,000	280	2,400	390	2,200	<2	<2	<2	<2	<10	--	--
	05/02/07	783.48	0.00	25.72	757.76	27,000	400	8,600	780	3,000	<100	<100	<100	<100	<500	--	--
	08/20/07	783.48	0.00	26.40	757.08	120,000	990	41,000	3,100	16,400	<400	<400	<400	<400	<2000	--	--
	11/27/07	783.48	0.00	26.23	757.25	70,000	540	24,000	2,000	9,200	<100	<100	<100	<100	<500	--	--
	02/26/08	783.48	0.00	26.40	757.08	18,000	120	5,600	480	2,200	<100	<100	<100	<100	<500	--	--
	05/21/08	783.48	0.00	26.70	756.78	37,000	260	13,000	960	5,300	<200	<200	<200	<200	<1000	--	--
	08/12/08	783.48	0.00	26.64	756.84	51,000	440	18,000	1,600	7,800	<200	<200	<200	<200	<1000	--	--
	11/05/08	783.48	0.00	26.77	756.71	44,000	300	18,000	1,500	9,100	<200	<200	<200	<200	<1000	--	--
	01/14/09	783.48	0.00	26.90	756.58	36,000	200	13,000	1,100	6,300	<100	<100	<100	<100	<500	--	--
	07/16/09	783.48	0.00	28.22	755.26	72,200	648	34,700**	1,980	12,000	<50	<50	<50	<50	<500	--	--
	10/29/09	783.48	0.00	28.32	755.16	93,200	1,050	37,900	2,060	11,400	<200	<200	<200	<200	<2000	--	--
	01/14/10	783.48	0.02	28.65	754.85	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/17/10	783.48	0.05	28.43	755.09	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	783.48	0.03	28.26	755.24	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/08/10	783.48	0.11	29.17	754.39	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/23/11	783.48	0.11	29.18	754.38	FPH	--	--	--	--	--	--	--	--	--	--	--
05/26/11	783.48	0.46	30.11	753.72	FPH	--	--	--	--	--	--	--	--	--	--	--	
12/10/11	783.48	0.00	29.13	754.35	179,000	310	23,000	2,900	18,000	<250	<250	<250	<250	<2500	<250	--	
02/11/12	783.48	0.00	30.37	753.11	Sampling Not required in 1Q12	--	--	--	--	--	--	--	--	--	--	--	--
05/17/12	783.48	0.76	30.46	753.02	FPH	--	--	--	--	--	--	--	--	--	--	--	
11/19/12	783.48	0.01	29.58	753.91	99,900	650	25,000	3,900	23,000	<100	<100	<100	<100	<1,000	--	--	
09/14/13	783.48	0.65	30.74	753.23	FPH	--	--	--	--	--	--	--	--	--	--	--	
10/18/14	783.48	0.61	31.34	752.60	FPH	--	--	--	--	--	--	--	--	--	--	--	
MW-15 ~10-35 screen	12/02/05	776.73	0.00	22.89	753.84	160,000	33,000	0.35	3,400	16,600	<100	<100	<100	<100	<500	--	--
	01/30/06	776.73	0.00	23.01	753.72	480,000	20,000	30,000	8,600	47,000	<1000	<1000	<1000	<1000	<5000	--	--
	05/23/06	776.73	0.00	23.04	753.69	260,000	25,000	18,000	1,900	10,300	<1000	<1000	<1000	<1000	<5000	--	--
	08/16/06	776.73	0.00	22.90	753.83	130,000	19,000	17,000	1,400	8,600	<1000	<1000	<1000	<1000	<5000	--	--
	11/01/06	776.73	0.00	22.86	753.87	81,000	16,000	15,000	1,700	9,300	<400	<400	<400	<400	<2000	--	--
	01/31/07	776.73	0.00	22.98	753.75	82,000	21,000	19,000	1,500	10,400	<400	<400	<400	<400	<2000	--	--
	05/02/07	776.73	0.00	23.04	756.69	78,000	18,000	16,000	1,300	7,600	<						

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
MW-15	05/26/11	776.43	1.14	26.94	750.35	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/10/11	776.43	1.42	27.62	749.88	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/11/12	776.43	1.43	28.52	748.98	Sampling Not required in 1Q12											
	05/17/12	776.43	1.55	27.92	749.67	FPH	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	776.43	1.54	28.19	749.40	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/14/13	776.43	1.84	29.07	748.74	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/18/14	776.43	1.94	30.35	747.54	FPH	--	--	--	--	--	--	--	--	--	--	--
	MW-16 ~10-35 screen	12/02/05	772.14	0.00	19.40	752.74	78,000	30,000	5,700	1,500	5,700	<40	<40	<40	<40	<200	--
01/30/06		772.14	0.00	19.41	752.73	180,000	34,000	18,000	3,100	16,400	<1000	<1000	<1000	<1000	<5000	--	--
05/23/06		772.14	0.00	19.29	752.85	64,000	30,000	6,700	1,100	4,800	<1000	<1000	<1000	<1000	<5000	--	--
08/16/06		772.14	0.00	19.32	752.82	41,000	9,700	3,600	490	2,890	<200	<200	<200	<200	<1000	--	--
11/01/06		772.14	0.00	19.36	752.78	71,000	18,000	6,700	1,200	5,700	<200	<200	<200	<200	<1000	--	--
01/31/07		772.14	0.00	19.37	752.77	42,000	16,000	5,500	590	3,630	<400	<400	<400	<400	<2000	--	--
05/02/07		772.14	0.00	19.39	752.75	<50000	20,000	720	<250	<750	<1000	<1000	<1000	<1000	<5000	--	--
08/20/07		772.14	0.00	19.93	752.21	96,000	20,000	13,000	1,900	10,700	<100	<100	<100	<100	<500	--	--
11/27/07		772.14	0.00	20.12	752.02	<50000	17,000	1,600	380	2,360	<1000	<1000	<1000	<1000	<5000	--	--
02/26/08		772.14	0.00	19.88	752.26	25,000	11,000	2,900	440	2,480	<200	<200	<200	<200	<1000	--	--
05/21/08		772.14	0.00	20.16	751.98	340	160	38.0	5.5	30.1	<2	<2	<2	<2	<10	--	--
08/12/08		772.14	0.00	20.65	751.49	40,000	16,000	5,100	790	4,600	68.0	<2	2.1	<2	780	--	--
11/05/08		772.14	0.00	21.09	751.05	--	--	--	--	--	--	--	--	--	--	--	--
01/14/09		772.14	0.00	20.96	751.18	110,000	14,000	24,000	4,000	23,100	<200	<200	<200	<200	<1000	--	--
07/16/09		772.14	0.30	21.55	750.82	FPH	--	--	--	--	--	--	--	--	--	--	--
10/29/09		772.14	1.95	23.75	749.86	FPH	--	--	--	--	--	--	--	--	--	--	--
01/14/10		772.14	1.00	23.00	749.90	FPH	--	--	--	--	--	--	--	--	--	--	--
06/17/10		772.14	2.15	23.80	749.95	FPH	--	--	--	--	--	--	--	--	--	--	--
09/16/10		772.14	2.02	24.06	749.60	FPH	--	--	--	--	--	--	--	--	--	--	--
12/08/10		772.14	2.04	24.45	749.22	FPH	--	--	--	--	--	--	--	--	--	--	--
02/23/11		772.14	1.49	23.07	750.19	FPH	--	--	--	--	--	--	--	--	--	--	--
05/26/11	772.14	1.14	23.07	749.93	FPH	--	--	--	--	--	--	--	--	--	--	--	
12/10/11	772.14	1.78	24.26	749.22	FPH	--	--	--	--	--	--	--	--	--	--	--	
02/11/12	772.14	1.54	24.93	748.37	Sampling Not required in 1Q12												
05/17/12	772.14	1.67	24.28	749.11	FPH	--	--	--	--	--	--	--	--	--	--	--	--
11/19/12	772.14	1.75	24.80	748.65	FPH	--	--	--	--	--	--	--	--	--	--	--	--
09/14/13	772.14	2.03	25.49	748.17	FPH	--	--	--	--	--	--	--	--	--	--	--	--
10/18/14	772.14	2.07	26.72	746.97	FPH	--	--	--	--	--	--	--	--	--	--	--	--
MW-17 ~10-45 screen	11/01/06	769.43	0.00	17.42	752.01	1,300	7.5	16.0	14.0	42.0	190	<2	1,400	<2	<10	--	--
	01/31/07	769.43	0.00	17.33	752.10	2,600	5.4	12.0	10.0	<15	160	<20	1,500	<20	180	--	--
	05/02/07	769.43	0.00	17.50	751.93	1,900	7.1	7.8	10.0	<15	160	<20	1,900	<20	190	--	--
	08/20/07	769.43	0.00	17.94	751.49	<5000	<25	<25	<25	<75	120	<100	2,300	<100	<500	--	--
	11/27/07	769.43	0.00	18.06	751.37	920	2.8	<0.5	8.5	1.0	110	<2	1,100	2.2	290	--	--
	02/26/08	769.43	0.00	17.72	751.71	730	4.5	2.8	6.6	<7.5	170	<10	890	<10	820	--	--
	05/21/08	769.43	0.00	18.07	751.36	640	7.8	<2.5	9.6	<7.5	120	<10	790	<10	940	--	--
	08/12/08	769.43	0.00	18.65	750.78	1,100	9.4	<2.5	12.0	<7.5	140	<10	830	<10	1900	--	--
	11/05/08	769.43	0.00	19.12	750.31	<500	6.7	5.5	13.0	8.4	110	<10	730	<10	2700	--	--
	01/14/09	769.43	0.00	18.92	750.51	1,000	13	<2.5	22.0	<7.5	210	<10	830	<10	2700	--	--
	07/16/09	769.43	0.30	20.00	749.66	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/29/09	769.43	0.78	20.78	749.24	FPH	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	769.43	1.63	21.58	749.08	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/17/10	769.43	0.37	20.25	749.46	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	769.43	0.60	21.60	748.28	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/09/10	769.43	0.67	21.37	748.57	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/24/11	769.43	0.63	20.43	749.48	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	769.43	0.35	20.25	749.44	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/09/11	769.43	1.73	22.20	748.53	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/11/12	769.43	1.66	23.03	747.65	Sampling Not required in 1Q12											
	05/17/12	769.43	1.80	22.19	748.59	FPH	--	--	--	--	--	--	--	--	--	--	--
11/19/12	769.43	1.85	22.70	748.12	FPH	--	--	--	--	--	--	--	--	--	--	--	--
09/14/13	769.43	1.73	23.01	747.72	FPH	--	--	--	--	--	--	--	--	--	--	--	--
10/18/14	769.43	1.74	24.34	746.40	FPH	--	--	--	--	--	--	--	--	--	--	--	--
MW-18 ~10-45 screen	11/01/06	768.65	0.00	16.52	752.13	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/31/07	768.65	0.00	16.40	752.25	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/02/07	768.65	0.00	16.51	752.14	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/20/07	768.65	0.00	16.98	751.67	<100	0.97	1.2	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/27/07	768.65	0.00	17.12	751.53	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	02/26/08	768.65	0.00	16.88	751.77	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/21/08	768.65	0.00	17.16	751.49	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/12/08	768.65	0.00	17.69	750.96	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/05/08	768.65	0.00	18.17	750.48	--	--	--	--	--	--	--	--	--	--	--	--
	07/16/09	768.65	0.00	18.84	749.81	--	--	--	--	--	--	--	--	--	--	--	--
	10/29/09	768.65	0.00	19.25	749.40	--	--	--	--	--	--	--	--	--	--	--	--
	01/11/10	768.65	--	--	--	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--
	01/14/10	768.65	0.00	19.45	749.20	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--
	06/17/10	768.65	0.00	19.08	749.57	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--
	09/16/10	768.65	0.00	19.60	749.05	<50	<0.5	0.7j	<0.5	2	<1	<1	<1	<1	<10	--	--
	12/09/10	768.65	0.00	19.96	748.69	<50	<0.5	<0.5	<0.5	<1	<1	<1	<1	<1	<10	--	--
	02/24/11	768.65	0.00	18.97	749.68												

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014  
Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
MW-18	09/14/13	768.65	0.00	20.81	747.84	<50	6.9	<0.5	1.3	4.9	<0.5	<0.5	<0.5	<0.5	<5	--	--
	10/17/14	768.65	0.00	22.00	746.65	<50	0.515	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
MW-19 ~10-45 screen	11/01/06	776.21	0.00	22.51	753.70	2,600	660	250	50.0	240	35.0	<2	<2	<2	<10	--	--
	01/31/07	776.21	0.00	22.47	753.74	2,300	480	68.0	22.0	105	<20	<20	<20	<20	<100	--	--
	05/02/07	776.21	0.00	22.68	753.53	2,900	1700	32.0	46.0	23.0	65.0	<20	21.0	<20	<100	--	--
	08/20/07	776.21	0.00	23.08	753.13	7,100	1800	330	340	226	63.0	<40	41.0	<40	<200	--	--
	11/27/07	776.21	0.00	23.03	753.18	560	29.0	6.0	21.0	41.0	21.0	<2	10.0	<2	<10	--	--
	02/26/08	776.21	0.00	22.83	753.38	240	25.0	1.4	21.0	3.36	23.0	<2	16.0	<2	12.0	--	--
	05/21/08	776.21	0.00	23.13	753.08	160	6.8	<0.5	11.0	<1.5	25.0	<2	17.0	<2	18.0	--	--
	08/12/08	776.21	0.00	23.58	752.63	2,200	14.0	0.94	29.0	72.0	<2	<2	<2	<2	30.0	--	--
	11/05/08	776.21	0.00	24.10	752.11	<100	9.0	<0.5	1.8	<1.5	39.0	<2	24.0	<2	<10	--	--
	01/14/09	776.21	0.00	24.11	752.10	1,400	5.8	5.1	10.0	119	30.0	<2	20.0	<2	18.0	--	--
	07/16/09	776.21	0.00	18.58	757.63	297	14.5	208	8.4	23.7	<1	<1	<1	<1	<10	--	--
	10/29/09	776.21	1.10	26.10	750.94	FPH	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	776.21	0.92	26.55	750.35	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/17/10	776.21	0.20	25.10	751.26	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	776.21	0.29	26.00	750.43	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/09/10	776.21	0.79	26.47	750.34	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/24/11	776.21	0.02	24.80	751.43	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	776.21	Sheen	24.95	751.26	--	--	--	--	--	--	--	--	--	--	--	--
	12/08/11	776.21	0.03	25.58	750.65	810,000	6,000	24,000	2,800	34,000	<500	<500	<500	<500	<5000	--	--
	02/11/12	776.21	1.02	27.35	749.63	Sampling Not required in 1Q12											
	05/17/12	776.21	0.97	26.62	750.32	FPH	--	--	--	--	--	--	--	--	--	--	--
11/19/12	776.21	--	--	--	Sampling Not required in 4Q12												
09/12/13	776.21	0.03	27.23	749.00	FPH	--	--	--	--	--	--	--	--	--	--	--	
10/17/14	776.21	0.00	28.05	748.16	1,650	15	4.5	50	260	9.5	<0.5	0.843	<0.5	30	--	--	
MW-20 ~10-45 screen	11/01/06	778.25	0.00	22.73	753.52	74,000	7,800	2,000	580	1,610	<200	<200	110,000	<200	<1000	--	--
	01/31/07	776.25	0.00	22.67	753.58	120,000	13,000	3,300	830	2,440	<1000	<1000	72,000	<1000	<5000	--	--
	05/02/07	776.25	0.00	22.75	753.50	100,000	16,000	1,500	850	580	<1000	<1000	83,000	<1000	<5000	--	--
	08/20/07	776.25	0.00	23.20	753.05	85,000	24,000	8,900	1,800	3,900	<1000	<1000	97,000	<1000	9,700	--	--
	11/27/07	776.25	0.00	23.22	753.03	56,000	15,000	180	1,200	910	<400	<400	33,000	<400	<2000	--	--
	02/26/08	776.25	0.00	23.07	753.18	52,000	19,000	<50	1,200	580	230	<200	31,000	<200	4,000	--	--
	05/21/08	776.25	0.00	23.35	752.90	46,000	20,000	<50	1,300	490	<200	<200	20,000	<200	7,300	--	--
	08/12/08	776.25	0.00	23.78	752.47	43,000	17,000	<100	1,200	1,000	<400	<400	14,000	<400	11,000	--	--
	11/05/08	776.25	0.00	24.30	751.95	120	83.0	<0.5	8.8	6.8	<2	<2	59.0	<2	48.0	--	--
	01/14/09	776.25	0.00	24.26	751.99	39,000	18,000	29	200	338	140	<20	6,200	21.0	11,000	--	--
	07/16/09	776.25	0.00	24.79	751.46	29,600	18100**	218	1,030	827	114	<50	4,600	<50	15,800	--	--
	10/29/09	776.25	1.17	26.37	750.76	FPH	--	--	--	--	--	--	--	--	--	--	
	01/14/10	776.25	1.07	26.65	750.41	FPH	--	--	--	--	--	--	--	--	--	--	
	06/17/10	776.25	0.01	25.20	751.06	FPH	--	--	--	--	--	--	--	--	--	--	
	09/16/10	776.25	Sheen	26.70	749.55	--	--	--	--	--	--	--	--	--	--	--	
	12/09/10	776.25	0.16	25.84	750.53	FPH	--	--	--	--	--	--	--	--	--	--	
	02/24/11	776.25	Sheen	25.10	751.15	--	--	--	--	--	--	--	--	--	--	--	
05/26/11	776.25	Sheen	25.19	751.06	--	--	--	--	--	--	--	--	--	--	--		
12/08/11	776.25	0.00	25.93	750.32	56,500	14,000	760	780	3,100	91	<50	1,200	<50	2,500	--	--	
02/11/12	776.25	0.00	26.82	749.43	Sampling Not required in 1Q12												
05/17/12	776.25	0.04	26.07	750.18	924,000	9,400	910	1,200	57,000	100	<100	1,600	<100	4,800	<100	4.1	
11/19/12	776.25	0.00	25.95	750.30	55,200	2,800	1,100	280	13,000	34	<20	360	<20	1,400	--	--	
09/12/13	776.25	0.00	27.35	748.90	5,800	6,000	<25	140	110	81	<25	570	<25	2,500	--	--	
10/17/14	776.25	0.00	28.28	747.97	6,510	1,100	<10	120	110	59	<10	430	<10	2,500	--	--	
MW-21 ~16-36 screen	05/17/12	770.22	0.00	20.51	749.71	2,040	3.9	7.2	130	380	30	<0.5	16	<0.5	29	<0.5	2.7
	11/19/12	770.22	0.00	21.04	749.18	4,670	10	<5	690	460	14	<5	6.2	<5	56	--	--
	09/12/13	770.22	0.00	21.67	748.55	1,800	6.5	1.4	160	260	18	<0.5	7.8	<0.5	78	--	--
	10/17/14	770.22	0.00	22.80	747.42	1,480	7.0	<1	200	290	15	<1	3.3	<1	<10	--	--
MW-22 ~12-32 screen	11/19/12	767.74	0.00	19.23	748.51	196	<0.5	<0.5	3.7	0.9	<0.5	<0.5	<0.5	<0.5	<5	<0.5	--
	09/12/13	767.74	0.00	19.67	748.07	220	1.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
	10/17/14	767.74	0.00	20.87	746.87	126	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
MW-23 ~21.5-24.5 screen	11/19/12	767.74	0.00	19.23	748.51	196	<0.5	<0.5	3.7	0.9	<0.5	<0.5	<0.5	<0.5	<5	<0.5	--
	09/12/13	767.74	0.00	19.67	748.07	220	1.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
10/17/14	775.43	0.00	27.12	748.31	<50	<0.5	<0.5	<0.5	<0.5	2.2	<0.5	<0.5	<0.5	<5	--	--	
RW-1 screen unknown	09/16/10	--	0.00	28.55	--	794	47.4	3.7	33.1	8.4	23.9	<1	84.1	<1	2,230	--	--
TSG-RW-1 screen unknown	02/01/05	766.39	0.00	25.69	740.70	110,000	19,000	13,000	2,100	11,000	78.1	<200	52,000	77.1	1,700	--	--
	08/02/05	779.42	0.00	24.60	754.82	350,000	17,000	16,000	2,200	10,700	<400	<400	310,000	<400	53,000	--	--
	11/01/05	779.42	0.00	23.86	755.56	99,000	4,100	4,500	500	5,600	<400	<400	36,000	<400	<200	--	--
	01/30/06	779.42	0.00	25.04	754.38	28,000	3,100	3,600	420	3,700	<200	<200	16,000	<200	5,000	--	--
	05/23/06	779.42	0.00	25.57	753.85	120,000	2,800	1,900	380	3,300	<1000	<1000	50,000	<1000	<5000	--	--
	08/16/06	779.42	0.00	25.34	754.08	200,000	19,000	11,000	1,600	9,000	<400	<400	69,000	<400	15,000	--	--
	11/01/06	779.42	0.00	25.48	753.94	240,000	23,000	19,000	2,800	17,100	<1000	<1000	120,000	<1000	21,000	--	--
	01/31/07	779.42	0.00	24.15	755.27	1,400	<5	<5	<5	<15	<20	<20	820	<20	1,800	--	--
	05/02/07	779.42	0.00	25.55	753.87	270	11.0	3.7	6.7	23.1	<2	<2	87	<2	200	--	

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014  
Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
TSG-RW-1	11/05/08	779.42	0.00	27.48	751.96	840	140	<0.5	6.7	55.0	7.6	<2	500	<2	94.0	--	--
	01/14/09	779.42	0.00	27.10	752.32	<100	<0.5	<0.5	0.87	3.6	<2	<2	4.9	<2	<10	--	--
RW-1A ~10-35 ~43-45 screen	07/16/09	779.42	0.00	27.66	751.76	404	33.9	270**	12.3	50.0	<1	<1	13.3	<1	<10	--	--
	10/29/09	779.42	0.00	28.30	751.12	170	94.4	4.0	7.7	18.8	<1	<1	1.0J	<1	<10	--	--
	01/14/10	779.42	0.00	28.30	751.12	766	146	62.1	28.5	81.8	<1	<1	1.3J	<1	<10	--	--
	06/17/10	779.42	0.00	28.02	751.40	2,940	232	76.6	38.5	335	12.7	<2.5	372	5.1	371	--	--
	09/16/10	779.42	0.00	28.35	751.07	1,590	301	10.4	33.5	107	38.2	<2.5	359	6.5	306	--	--
	12/09/10	779.42	0.00	28.86	750.56	374	156	3.8	<1.25	8.0	40.7	<2.5	129	6.0	302	--	--
	02/24/11	779.42	0.00	27.99	751.43	142	4.1	<0.5	<0.5	<1	5.4	<1	169	1.4J	121	--	--
	05/26/11	779.42	0.00	28.33	751.09	518	155	68	11	48.3	<1	<1	<1	<1	<10	--	--
	12/08/11	779.42	0.00	28.74	750.68	321	21	<0.5	<0.5	1.2	22	<0.5	95.0	8.9	100	--	--
	02/11/12	779.42	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	779.42	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	779.42	0.00	29.19	750.23	--	--	--	--	--	--	--	--	--	--	--	--
	09/12/13	779.42	0.00	30.26	749.16	--	--	--	--	--	--	--	--	--	--	--	--
	10/17/14	779.42	1.43	32.30	748.19	FPH	--	--	--	--	--	--	--	--	--	--	--
	RW-2 ~10-35 screen	02/01/05	766.39	0.00	23.97	742.42	90,000	31,000	18,000	1,800	7,200	120J	<400	600	<400	<2000	--
08/02/05		778.34	0.00	22.18	756.16	38,000	14,000	8,000	1,500	7,300	<400	<400	<400	<400	<2000	--	--
11/01/05		778.34	0.00	23.25	755.09	15,000	3,200	90.0	190	4800	44.0	<20	<20	<20	<100	--	--
01/30/06		778.34	0.00	23.58	754.76	9,200	6,400	92.0	200	196	150	<40	56.0	<40	220	--	--
05/23/06		778.34	0.00	23.67	754.67	46,000	7,400	1,300	700	1,200	170	<100	280	<100	<500	--	--
08/16/06		778.34	0.00	23.49	754.85	11,000	170	240	260	1,300	<20	<20	<20	<20	<100	--	--
11/01/06		778.34	0.00	23.41	754.93	71,000	1,800	2,100	2,700	10,500	29.0	<20	<20	<20	<100	--	--
01/31/07		778.34	0.00	23.45	754.89	120,000	21,000	14,000	2,000	9,900	54.0	<40	<40	<40	<200	--	--
05/02/07		778.34	0.00	23.72	754.62	1,200	340	90.0	29.0	138	<2	<2	8.6	<2	60.0	--	--
08/20/07		778.34	0.00	20.00	758.34	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
11/27/07		778.34	0.00	24.50	753.84	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
02/26/08		778.34	0.00	24.27	753.07	<100	2.8	<0.5	<0.5	1.2	<2	<2	4.1	<2	<10	--	--
05/21/08		778.34	0.00	24.53	753.81	680	70.0	1.6	1.0	24.0	10.0	<2	81.0	<2	35.0	--	--
08/12/08		778.34	0.00	24.95	753.39	1100	120	2.6	5.1	65.0	31.0	<2	160	<2	290	--	--
11/05/08		778.34	0.00	24.95	753.39	110	69.0	<0.5	<0.5	0.75	10.0	<2	100	<2	47.0	--	--
01/14/09		778.34	0.00	25.33	753.01	<100	<0.5	<0.5	<0.5	<1.5	2.4	<2	23.0	<2	<10	--	--
07/16/09		778.34	0.00	26.05	752.29	235	95.3	44.1	8.4	29.6	<1	<1	2.4	<1	<10	--	--
10/29/09		778.34	0.00	25.40	752.94	--	--	--	--	--	--	--	--	--	--	--	--
01/14/10		778.34	0.00	25.40	752.94	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--
06/17/10		778.34	0.00	26.39	751.95	NS	--	--	--	--	--	--	--	--	--	--	--
09/16/10	778.34	0.00	25.70	752.64	5,480	1,840**	257	123	726	14.3	<5	20.0	6.7J	<50	--	--	
12/09/10	778.34	0.00	27.03	751.31	--	--	--	--	--	--	--	--	--	--	--	--	
02/24/11	778.34	0.00	26.14	752.20	--	--	--	--	--	--	--	--	--	--	--	--	
05/26/11	778.34	0.00	Dry	--	--	--	--	--	--	--	--	--	--	--	--	--	
12/08/11	778.34	0.00	27.08	751.26	135	22	1.3	1.5	2.6	1.8	<0.5	1.1	<0.5	<5	--	--	
02/11/12	778.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
05/17/12	778.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
11/19/12	778.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
09/12/13	778.34	0.00	28.23	750.11	3,300	1,000	11	190	440	36	<10	<10	<10	<100	--	--	
10/17/14	778.34	0.00	29.58	748.76	2,570	220	200	73	810	15	<1	2.4	<1	<10	--	--	
RW-3 screen unknown	02/01/05	766.39	0.00	24.35	742.04	130,000	24,000	42,000	2,900	17,500	82J	<400	11,000	<400	<2000	--	--
	08/02/05	778.75	0.00	22.70	756.05	110,000	14,000	24,000	2,500	12,800	<100	<100	22,000	<100	5,400	--	--
	11/01/05	778.75	0.00	22.90	755.85	130,000	9,900	17,000	<100	13,400	<400	<400	12,000	<400	<2000	--	--
	01/30/06	778.75	0.00	23.10	755.65	30,000	11,000	4,400	770	4,300	<200	<200	920	<200	<1000	--	--
	05/23/06	778.75	0.00	23.67	755.08	9,100	36.0	65.0	<10	910	<40	<40	100	<40	<200	--	--
	08/16/06	778.75	0.00	24.02	754.73	28,000	1,500	1,200	800	2,050	<20	<20	670	<20	<100	--	--
	11/01/06	778.75	0.00	24.01	754.74	31,000	380	2,300	1,000	4,200	<40	<40	<40	<40	<200	--	--
	11/27/07	778.75	0.00	DRY	NA	--	--	--	--	--	--	--	--	--	--	--	--
	02/26/08	778.75	0.00	DRY	NA	--	--	--	--	--	--	--	--	--	--	--	--
	05/21/08	778.75	0.00	DRY	NA	--	--	--	--	--	--	--	--	--	--	--	--
08/12/08	778.75	0.00	DRY	NA	--	--	--	--	--	--	--	--	--	--	--	--	
RW-3R ~10-35 ~43-45 screen	11/05/08	778.75	0.00	26.30	752.45	<100	<0.5	0.85	1.4	12.6	<2	<2	<2	<2	<10	--	--
	01/14/09	778.75	0.00	26.17	752.58	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	07/16/09	778.75	0.00	26.91	751.84	579	261**	133	12.3	45.2	<1	<1	1.2J	<1	<10	--	--
	10/29/09	778.75	0.00	27.50	751.25	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	778.75	0.00	27.50	751.25	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--
	06/17/10	778.75	0.00	27.22	751.53	--	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	778.75	0.00	27.40	751.35	16,100	3,680**	3,580**	105	2,340**	26.7	<2	31.0	<2	<20	--	--
	12/09/10	778.75	0.00	28.03	750.72	--	--	--	--	--	--	--	--	--	--	--	--
	02/24/11	778.75	0.00	27.31	751.44	--	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	778.75	0.00	27.88	750.87	--	--	--	--	--	--	--	--	--	--	--	--
	12/08/11	778.75	0.00	27.94	750.81	199	7.9	<0.5	<0.5	0.6	0.9	<0.5	<0.5	<0.5	<5	--	--
	02/11/12	778.75	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	778.75	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11/19/12	778.75	0.00	28.34	750.41	--	--	--	--	--	--	--	--	--	--	--	--	
09/12/13	778.75	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
10/17/14	778.75	1.07	31.24	748.31	FPH	--	--	--	--	--	--	--	--	--	--	--	
RW-4 ~10-35 screen	02/01/05	766.39	0.00	25.24	741.15	130,000	35,000	32,000	2,300	12,600	190J	<400	2,200</				

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)	
RW-4	08/16/06	779.65	0.00	24.46	755.19	79,000	17,000	9,500	1,100	5,400	<200	<200	2,200	<200	<1000	--	--	
	11/01/06	779.65	0.00	24.46	755.19	180,000	41,000	30,000	2,300	14,100	<400	<400	4,900	<400	<2000	--	--	
	01/31/07	779.65	0.00	24.25	755.40	1,000	99.0	170	13.0	168	<2	<2	51.0	<2	74.0	--	--	
	05/02/07	779.65	0.00	24.82	754.83	2,400	720	340	50.0	240	<2	<2	<2	<2	<10	--	--	
	08/20/07	779.65	0.00	25.13	754.52	11,000	1,900	830	200	1080	<200	<200	510	<200	<1000	--	--	
	11/27/07	779.65	0.00	25.48	754.17	17,000	2,700	1,700	370	1700	<200	<200	740	<200	<1000	--	--	
	02/26/08	779.65	0.00	25.38	754.27	2,800	100	480	38.0	610	<10	<10	<10	<10	350	--	--	
	05/21/08	779.65	0.00	25.59	754.06	6,300	560	1,200	170	960	<20	<20	<20	<20	<100	--	--	
	08/12/08	779.65	0.00	25.96	753.69	4,700	410	730	110	840	40	<20	58.0	<20	<100	--	--	
	11/05/08	779.65	0.00	26.47	753.18	<1000	67.0	390	54.0	340	<20	<20	<20	<20	<100	--	--	
	01/14/09	779.65	0.00	26.38	753.27	830	26.0	130	26.0	186	<2	<2	<2	<2	<10	--	--	
	07/16/09	779.65	0.00	27.18	752.47	935	431**	174**	16.9	65.3	4.5	<1	35.0	<1	69.7	--	--	
	10/29/09	779.65	0.00	27.75	751.90	207	24.8	2.2	9.3	35.8	<1	<1	4.3	<1	14.0J	--	--	
	01/14/10	779.65	0.00	27.75	751.90	407	64.1	24.2	18.1	53.6	<1	<1	1.7J	<1	<10	--	--	
	06/17/10	779.65	0.00	27.57	752.08	2,560	159	5.0	171	53.9	8.5	<2	19.1	<2	85.7	--	--	
	09/16/10	779.65	0.00	27.61	752.04	5,930	443**	43.3	143	781	18.0	<2	134	<2	172	--	--	
	12/09/10	779.65	0.00	28.24	751.41	783	168	2.0	<0.5	17.6	10.5	<1	116	<1	384	--	--	
	02/24/11	779.65	0.00	27.58	752.07	8,620	748**	46.8	257**	1190**	5.4	<0.5	15.3	1.0J	46.8	--	--	
	05/26/11	779.65	0.00	28.10	751.55	2,490	1,230	287	42.7	185	<10	<10	20.9	<10	<100	--	--	
	12/08/11	779.65	0.00	28.11	751.54	353	11	1.2	16	25	11	<0.5	19	<0.5	17	--	--	
	02/11/12	779.65	--	--	--	--	Sampling Not required in 1Q12											
	05/17/12	779.65	--	--	--	--	Sampling Not required in 2Q12											
	11/19/12	779.65	0.00	28.52	751.13	14,500	7,700	<50	<50	120	120	<50	150	<50	<500	--	--	
10/17/14	779.65	0.53	31.04	749.01	FPH	--	--	--	--	--	--	--	--	--	--	--		
RW-5 ~10-35 screen	02/01/05	766.39	0.00	25.43	740.96	96,000	23,000	21,000	2,100	11,800	<400	<400	1200	<400	<2000	--	--	
	08/02/05	779.42	0.00	24.57	754.85	140,000	25,000	26,000	1,900	12,700	<200	<200	2900	<200	<1000	--	--	
	11/01/05	779.42	0.00	24.89	754.53	190,000	27,000	23,000	2,000	11,600	<1000	<1000	<1000	<1000	<5000	--	--	
	01/30/06	779.42	0.00	25.08	754.34	92,000	25,000	26,000	2,000	13,200	<400	<400	<400	<400	<2000	--	--	
	05/23/06	779.42	0.00	25.13	754.29	140,000	15,000	15,000	1,500	10,000	<1000	<1000	<1000	<1000	<5000	--	--	
	08/16/06	779.42	0.00	24.85	754.57	170,000	21,000	22,000	2,100	14,200	<400	<400	<400	<400	<2000	--	--	
	11/01/06	779.42	0.00	24.94	754.48	190,000	30,000	21,000	2,700	15,000	<1000	<1000	2300	<1000	<5000	--	--	
	01/31/07	779.42	0.00	25.00	754.42	100,000	21,000	23,000	2,300	13,300	<1000	<1000	<1000	<1000	<5000	--	--	
	05/02/07	779.42	0.00	25.16	754.26	13,000	190	880	140	2,560	<40	<40	<40	<40	<200	--	--	
	08/20/07	779.42	0.00	23.33	756.09	1,100	<5	17.0	8.5	237	<20	<20	<20	<20	<100	--	--	
	11/27/07	779.42	0.00	25.80	753.62	760	1.7	4.1	5.4	174	<2	<2	<2	<2	<10	--	--	
	02/26/08	779.42	0.00	25.65	753.77	1,400	45.0	10.0	7.8	247	<2	<2	<2	<2	42.0	--	--	
	05/21/08	779.42	0.00	25.90	753.52	11,000	3,700	67.0	47.0	560	62	<2	<2	<2	240	--	--	
	08/12/08	779.42	0.00	26.32	753.10	23,000	13,000	1100	78.0	750	<100	<100	<100	<100	1500	--	--	
	11/05/08	779.42	0.00	26.87	752.55	4,200	820	320	32.0	460	<10	<10	<10	<10	130	--	--	
	01/14/09	779.42	0.00	26.77	752.65	1,100	84.0	22.0	3.9	93.0	3.3	<2	<2	<2	59	--	--	
	07/16/09	779.42	0.00	27.38	752.04	<50	7.3	2.1	<0.5	3.7	5.6	<1	<1	<1	99.2	--	--	
	10/29/09	779.42	0.00	28.10	751.32	4,610	582**	84.9	20.6	401	22.2	<1	1.5J	<1	97.1	--	--	
	01/14/10	779.42	0.00	28.10	751.32	3,460	163	41	23.8	266	7.5	<2.5	<2.5	<2.5	100	--	--	
	06/17/10	779.42	0.00	27.85	751.57	11,100	4,410**	261	144	643	34.9	<2.5	<2.5	<2.5	289	--	--	
	09/16/10	779.42	0.00	28.11	751.31	16,700	9,920**	431	221	1,230	44.5J	<25	<25	<25	539	--	--	
	12/09/10	779.42	0.00	28.67	750.75	3,940	3,250	59.4	<10	94.2	<20	<20	<20	<20	227J	--	--	
	02/24/11	779.42	0.00	27.80	751.62	23,200	18,800**	486	345	1,390	65.6	<20	<20	<20	392J	--	--	
05/26/11	779.42	0.00	29.12	750.30	1,970	728	156	26	123	15.7	<5	<5	<5	50J	--	--		
12/08/11	779.42	0.00	28.53	750.89	11,600	3,100	34	<25	130	34	<25	<25	<25	<250	--	--		
02/11/12	779.42	--	--	--	--	Sampling Not required in 1Q12												
05/17/12	779.42	0.00	29.00	750.42	--	Sampling Not required in 4Q12												
09/12/13	779.42	0.75	31.45	748.53	--	Sampling Not required in 3Q13												
10/17/14	779.42	1.23	31.96	748.38	FPH	--	--	--	--	--	--	--	--	--	--	--		
RW-6 ~10-35 screen	02/01/05	766.39	0.00	25.34	741.05	80,000	22,000	16,000	1,700	8,800	70J	<400	5,600	<400	<2000	--	--	
	08/02/05	779.08	0.00	24.15	754.93	140,000	32,000	27,000	2,500	8,600	<200	<200	7,100	<200	<1000	--	--	
	11/01/05	779.08	0.00	22.85	756.23	140,000	34,000	28,000	2,400	10,800	82.0	<40	6,000	600	1,100	--	--	
	01/30/06	779.08	0.00	24.93	754.15	96,000	32,000	27,000	2,200	9,200	<400	<400	5,000	<400	<2000	--	--	
	05/23/06	779.08	0.00	25.14	753.94	17,000	3,000	1,400	250	1,570	<100	<100	2,800	<100	1,800	--	--	
	08/16/06	779.08	0.00	24.95	754.13	20,000	2,500	1,400	260	970	43.0	<40	4,800	85.0	1,400	--	--	
	11/01/06	779.08	0.00	25.12	753.96	32,000	7,100	1,400	430	1,120	92.0	<20	9,400	<20	<100	--	--	
	01/31/07	779.08	0.00	22.80	756.28	120	8.4	<0.5	<0.5	<1.5	<2	<2	15.0	<2	<10	--	--	
	05/02/07	779.08	0.00	25.21	753.87	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	08/20/07	779.08	0.00	21.85	757.23	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	11/27/07	779.08	0.00	25.95	753.13	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	02/26/08	779.08	0.00	25.72	753.36	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	05/21/08	779.08	0.00	25.93	753.15	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	08/12/08	779.08	0.00	26.49	752.59	<100	2.8	<0.5	<0.5	<1.5	<2	<2	25	<2	33	--	--	
	11/05/08	779.08	0.00	27.03	752.05	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	01/14/09	779.08	0.00	26.75	752.33	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	
	07/16/																	

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
RW-6	09/12/13	779.42	0.15	30.29	749.24	Sampling Not required in 3Q13											
	10/17/14	779.42	0.03	31.08	748.36	12,200	64	6.5	32	2200	<5	<5	74	<5	88	--	--
RW-7 ~10-35 screen	02/01/05	766.39	0.00	23.47	742.92	24,000	2,600	4,200	670	5,200	15.0	<2	14.0	<2	<10	--	--
	08/02/05	777.26	0.00	22.60	754.66	33,000	5,400	3,000	1,100	4,100	<20	<20	25.0	220	<100	--	--
	11/01/05	777.26	0.00	21.57	755.69	7,500	65.0	140	21.0	1120	4.1	<2	<2	<2	<10	--	--
	01/30/06	777.26	0.00	23.00	754.26	4,200	360	110	80.0	420	<10	<10	<10	<10	<50	--	--
	05/23/06	777.26	0.00	23.20	754.06	23,000	3,500	1,300	490	1820	22.0	<10	41.0	<10	<50	--	--
	08/16/06	777.26	0.00	23.03	754.23	1,400	18.0	6.4	1.6	99.0	<2	<2	<2	<2	<10	--	--
	11/01/06	777.26	0.00	23.35	753.91	13,000	5,200	640	490	520	53.0	<2	28.0	<2	<10	--	--
	01/31/07	777.26	0.00	23.12	754.14	36,000	15,000	2,900	1,400	1,670	<200	<200	<200	<200	<1000	--	--
	05/02/07	777.26	0.00	23.44	753.82	1,300	45.0	120	20.0	188	9.4	<2	3.7	<2	<10	--	--
	08/20/07	777.26	0.00	22.48	754.78	1,000	3.4	9.2	1.2	201	<2	<2	8.6	<2	<10	--	--
	11/27/07	777.26	0.00	24.21	753.05	<100	<0.5	<0.5	<0.5	1.1	<2	<2	<2	<2	<10	--	--
	02/26/08	777.26	0.00	23.96	753.30	<100	<0.5	1.7	0.95	8.1	<2	<2	6.8	<2	<10	--	--
	05/21/08	777.26	0.00	24.18	753.08	110	15.0	<0.5	<0.5	13.2	3.0	<2	2.2	<2	<10	--	--
	08/12/08	777.26	0.00	24.79	752.47	4,600	2,300	6.5	34.0	166	6.9	<2	<2	<2	<10	--	--
	11/05/08	777.26	0.00	25.26	752.00	360	200	3.9	2.0	34.0	8.1	<2	<2	<2	37	--	--
	01/14/09	777.26	0.00	25.16	752.10	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	07/16/09	777.26	0.00	25.73	751.53	279	9.6	122	9.3	36.2	<1	<1	<1	<1	<10	--	--
	10/29/09	777.26	0.00	25.80	751.46	4,890	335	785**	23.8	1,220**	<1	<1	6.4	<1	<10	--	--
	01/14/10	777.26	0.00	25.80	751.46	5,440	449	615	17.0	1,090	<5	<5	6.5	<5	<50	--	--
	06/17/10	777.26	0.00	26.12	751.14	7,980	538	622	142	1,250	<5	<5	25.8	<5	<50	--	--
	09/16/10	777.26	0.00	26.50	750.76	4,970	496	313	67.4	1,360	<10	<10	18.7J	<10	<100	--	--
	12/09/10	777.26	0.00	26.98	750.28	<50	<0.5	<0.5	<0.5	<1	<1	<1	9.9	<1	77.3	--	--
	02/24/11	777.26	0.00	26.00	751.26	20,800	2,320**	1,680**	420**	3,450**	2.2	<1	18.5	<1	56.3	--	--
	05/26/11	777.26	0.00	26.62	750.64	656	180	54.8	9.5	45.9	<2	<2	<2	<2	<20	--	--
	12/08/11	777.26	0.00	26.82	750.44	168	5.0	0.9	<0.5	10	<0.5	<0.5	<0.5	<0.5	<5	--	--
	02/11/12	777.26	--	--	--	Sampling Not required in 1Q12											
	05/17/12	777.26	--	26.94	750.32	3,240	360	220	66	430	<5	<5	<5	<5	<50	<5	4.0
	11/19/12	777.26	--	--	--	Sampling Not required in 4Q12											
	09/12/13	777.26	0.00	28.43	748.83	4,100	110	<5	93	2,300	<5	<5	<5	<5	<50	--	--
	10/17/14	777.26	0.00	29.32	747.94	5,020	51	2.5	100	940	1.1	<0.5	<0.5	<0.5	14	--	--
RW-8 ~10-35 screen	02/01/05	766.39	0.00	21.79	744.60	12,000	4,900	690	230	520	43J	<200	55J	<200	<1000	--	--
	08/03/05	775.18	0.00	20.80	754.38	9,300	3,300	1,300	530	2,010	44.0	<40	<40	<40	<200	--	--
	11/02/05	775.18	0.00	21.35	753.83	31,000	2,300	2,400	490	3,900	<100	<100	<100	<100	<500	--	--
	01/30/06	775.18	0.00	21.11	754.07	8,800	1,700	1,400	400	1,440	50	<40	<40	<40	<200	--	--
	05/23/06	775.18	0.00	18.40	756.78	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/16/06	775.18	0.00	20.08	755.10	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/01/06	775.18	0.00	21.63	753.55	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/31/07	775.18	0.00	21.05	754.13	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/02/07	775.18	0.00	21.59	753.59	<100	<0.5	<0.5	<0.5	<1.5	9.3	<2	5.1	<2	<10	--	--
	08/20/07	775.18	0.00	22.07	753.11	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/27/07	775.18	0.00	22.25	752.93	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	02/26/08	775.18	0.00	22.16	753.02	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	05/21/08	775.18	0.00	22.28	752.90	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/12/08	775.18	0.00	22.95	752.23	580	450	3.5	0.95	67.0	15	<2	<2	<2	<10	--	--
	11/05/08	775.18	0.00	23.46	751.72	<100	0.5	0.75	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/14/09	775.18	0.00	23.43	751.75	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	07/16/09	775.18	0.00	23.95	751.23	66J	13.1	0.9J	3.8	2.8	<1	<1	1.7J	<1	<10	--	--
	10/29/09	775.18	0.00	24.46	750.72	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	775.18	0.00	24.46	750.72	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--
	06/17/10	775.18	0.00	24.33	750.85	--	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	775.18	0.00	24.75	750.43	<50	<0.5	<0.5	<0.5	2.9	<1	<1	2.9	<1	<10	--	--
	12/09/10	775.18	0.00	25.16	750.02	--	--	--	--	--	--	--	--	--	--	--	--
	02/24/11	775.18	0.00	24.28	750.90	--	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	775.18	0.00	24.25	750.93	--	--	--	--	--	--	--	--	--	--	--	--
	12/08/11	775.18	0.00	24.98	750.20	178	5.8	1.4	1.4	7.3	5.3	<0.5	<0.5	<0.5	16	--	--
	02/11/12	775.18	--	--	--	Sampling Not required in 1Q12											
	05/17/12	775.18	--	--	--	Sampling Not required in 2Q12											
	11/19/12	775.18	0.45	25.86	749.66	FPH											
	09/12/13	775.18	0.00	26.40	748.78	Sampling Not required in 3Q13											
	10/17/14	775.18	0.00	27.24	747.94	Sampling Not Required in 4Q14											
RW-9 ~10-35 screen	02/02/05	766.39	0.00	21.19	745.20	25,000	890	720	1,300	7,400	<200	<200	490	<200	<100	--	--
	08/03/05	774.59	0.00	20.05	754.54	26,000	300	410	1,800	8,500	<20	<20	<20	<20	<100	--	--
	11/01/05	774.59	0.00	20.89	753.70	45,000	330	450	1,400	8,800	<100	<100	<100	<100	<500	--	--
	01/30/06	774.59	0.00	20.94	753.65	22,000	220	360	1,400	7,700	<40	<40	<40	<40	<200	--	--
	05/23/06	774.59	0.00	19.65	754.94	220	<0.5	1.1	4.0	51.0	<2	<2	<2	<2	<10	--	--
	08/16/06	774.59	0.00	20.75	753.84	<100	<0.5	<0.5	<0.5	2.7	<2	<2	<2	<2	<10	--	--
	11/01/06	774.59	0.00	21.10	753.49	7,300	<0.5	2.6	80.0	770	<2	<2	<2	<2	<10	--	--
	01/31/07	774.59	0.00	20.87	753.72	<500	<2.5	<2.5	<2.5	<7.5	<10	<10	<10	<10	<50	--	--
	05/02/07	774.59	0.00	21.14	753.45	1,900	23	0.69	21.0	201	10	<2	<2	<2	<10	--	--
	08/20/07	774															

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014  
Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
RW-9	06/16/10	774.59	0.00	24.21	750.38	87J	<0.5	<0.5	3.7	7.7	<1	<1	<1	<1	<10	--	--
	12/09/10	774.59	0.00	24.63	749.96	76J	0.6J	<0.5	<0.5	7.3	<1	<1	<1	<1	<10	--	--
	02/24/11	774.59	0.00	23.52	751.07	351	2.4	0.7J	5.3	3.2	<1	<1	<1	<1	<10	--	--
	05/26/11	774.59	0.00	23.56	751.03	110	4.4	4.8	5.9	12.7	<1	<1	<1	<1	<10	--	--
	12/08/11	774.59	0.00	24.41	750.18	311	2.9	3.0	26	5.8	<0.5	<0.5	<0.5	<0.5	<5	--	--
	02/11/12	774.59	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	774.59	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	774.59	0.00	25.07	749.52	--	--	--	--	--	--	--	--	--	--	--	--
	09/12/13	774.59	0.00	25.72	748.87	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
	10/17/14	774.59	0.00	26.79	747.80	--	--	--	--	--	--	--	--	--	--	--	--
RW-10 ~10-35 screen	02/01/05	766.39	0.00	21.80	744.59	21,000	3,300	1,300	520	1,510	170J	<200	7,000	<200	<1000	--	--
	08/03/05	775.27	0.00	21.33	753.94	24,000	3,900	190	400	150	180	<20	41,000	<20	12,000	--	--
	11/02/05	775.27	0.00	21.31	753.96	92,000	7,400	3,900	720	7,500	<400	<400	24,000	<400	<2000	--	--
	01/30/06	775.27	0.00	21.40	753.87	3,200	620	300	85.0	320	<10	<10	2,000	<10	3,100	--	--
	05/23/06	775.27	0.00	20.00	755.27	1,000	<2.5	<2.5	<2.5	<5	<10	<10	760	<10	3,100	--	--
	08/16/06	775.27	0.00	21.46	753.81	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	44.0	<2	<10	--	--
	11/01/06	775.27	0.00	21.75	753.52	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/31/07	775.27	0.00	21.70	753.57	<100	<0.5	<0.5	<0.5	2.5	<2	<2	<2	<2	<10	--	--
	05/02/07	775.27	0.00	21.73	753.54	110	<0.5	0.82	1.2	17.3	<2	<2	2.7	<2	<10	--	--
	08/20/07	775.27	0.00	22.26	753.01	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/27/07	775.27	0.00	22.44	752.83	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	02/26/08	775.27	0.00	22.25	753.02	<100	2.9	<0.5	<0.5	1.5	<2	<2	14.0	<2	<10	--	--
	05/21/08	775.27	0.00	22.49	752.78	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	08/12/08	775.27	0.00	22.96	752.31	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	11/05/08	775.27	0.00	23.42	751.85	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	13.0	<2	<10	--	--
	01/14/09	775.27	0.00	23.47	751.80	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	4.9	<2	17.0	--	--
	07/16/09	775.27	0.00	23.98	751.29	105	30.9	1.5	7.2	6.6	<1	<1	2.0	<1	<10	--	--
	10/29/09	775.27	0.00	24.66	750.61	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	775.27	0.00	24.66	750.61	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--
	06/17/10	775.27	0.00	24.38	750.89	1,150	71.4	37.5	1.2	182	14.3	<1	322	<1	<10	--	--
09/16/10	775.27	0.00	24.45	750.82	586	38.4	12.8	<1	82.8	16.0	<2	406	<2	86.2	--	--	
12/09/10	775.27	0.00	25.21	750.06	382	<1	<1	<1	<2	14.6	<2	433	<2	244	--	--	
02/24/11	775.27	0.00	24.29	750.98	2,630	257	131	6.5	571	17.5	<2	271	<2	181	--	--	
05/26/11	775.27	0.00	24.38	750.89	326	17.0	7.6	4.6	20.8	3.2	<1	5.8	<1	386	--	--	
12/08/11	775.27	0.00	25.09	750.18	107	0.6	2.3	1.2	5.2	2.1	<0.5	100	<0.5	34	--	--	
02/11/12	775.27	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
05/17/12	775.27	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
11/19/12	775.27	0.00	26.58	748.69	--	--	--	--	--	--	--	--	--	--	--	--	
09/12/13	775.27	0.00	26.54	748.73	--	--	--	--	--	--	--	--	--	--	--	--	
10/17/14	775.27	0.00	27.45	747.82	--	--	--	--	--	--	--	--	--	--	--	--	
RW-11 ~10-35 screen	02/01/05	766.39	0.00	21.54	744.85	50,000	14,000	3,400	1,100	1,810	78J	<400	15,000	<400	<2000	--	--
	08/03/05	774.91	0.00	20.43	754.48	40,000	13,000	4,700	1,400	3,300	<400	<400	27,000	<400	<2000	--	--
	11/02/05	774.91	0.00	19.94	754.97	86,000	9,100	3,500	880	3,900	<200	<200	16,000	<200	<1000	--	--
	05/23/06	774.91	0.00	20.00	754.91	340	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	780	--	--
	08/16/06	774.91	0.00	21.51	753.40	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	8.4	<2	<10	--	--
	11/01/06	774.91	0.00	21.61	753.30	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	01/31/07	774.91	0.00	21.56	753.35	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	2.8	<2	<10	--	--
	05/02/07	774.91	0.00	21.63	753.28	190	3.0	<0.5	0.62	<1.5	2.5	<2	210	<2	<10	--	--
	08/20/07	774.91	0.00	22.18	752.73	900	160	0.55	4.9	11.6	5.8	<2	920	<2	160	--	--
	11/27/07	774.91	0.00	22.31	752.60	2,700	1,000	3.7	5.6	58.0	48.0	<2	8,000	<2	920	--	--
	02/26/08	774.91	0.00	22.10	752.81	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	15.0	<2	<10	--	--
	05/21/08	774.91	0.00	22.40	752.51	170	54.0	<0.5	<0.5	2.3	<2	<2	170	<2	52.0	--	--
	08/12/08	774.91	0.00	22.85	752.06	200	44.0	<0.5	<0.5	1.8	<2	<2	180	<2	51.0	--	--
	11/05/08	774.91	0.00	23.34	751.57	280	13.0	<0.5	<0.5	<1.5	4.9	<2	530	<2	390	--	--
	01/14/09	774.91	0.00	23.33	751.56	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	3.3	<2	14.0	--	--
	07/16/09	774.91	0.00	23.84	751.07	95.0	14.5	<0.5	2.8	3.3	<1	<1	1.8J	<1	<10	--	--
	10/29/09	774.91	0.00	19.72	755.19	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	774.91	0.00	19.72	755.19	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--
	06/17/10	774.91	0.00	24.25	750.66	426	108	14.0	1.7	56.2	1.3J	<1	8.7	<1	<10	--	--
	09/16/10	774.91	0.00	24.71	750.20	58J	0.8J	<0.5	<0.5	3.4	2.8	<1	110	<1	82.9	--	--
12/09/10	774.91	0.00	25.15	749.76	144	<0.5	<0.5	<0.5	4.9	1.4J	<1	11.8	<1	<10	--	--	
02/24/11	774.91	0.00	24.15	750.76	<50	<0.5	<0.5	<0.5	1.0J	<1	<1	25.7	<1	<10	--	--	
05/26/11	774.91	0.00	24.23	750.68	64J	7.8	5.9	3.9	13.9	<1	<1	<1	<1	<10	--	--	
12/08/11	774.91	0.00	25.36	749.55	230	9.1	24	7.0	31	2.6	<0.5	10	<0.5	60	--	--	
02/11/12	774.91	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
05/17/12	774.91	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
11/19/12	774.91	0.00	25.38	749.53	--	--	--	--	--	--	--	--	--	--	--	--	
09/12/13	774.91	0.00	26.30	748.61	--	--	--	--	--	--	--	--	--	--	--	--	
10/17/14	774.91	0.00	27.19	747.72	--	--	--	--	--	--	--	--	--	--	--	--	
RW-12 ~10-35 screen	02/01/05	766.39	0.00	22.80	743.59	42,000	3,200	11,000	1,700	5,900	100J	<200	<200	<200	<1000	--	--
	08/03/05	776.29	0.00	21.42	754.87	42,000	3,700	15,000	1,900	8,400	7.1	<2	<2	28.0	<10	--	--
	11/02/05	776.29	0.00	22.54	753.75	44,000	5,500	8,100	1,700	5,30							

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014  
Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
RW-12	11/05/08	776.29	0.00	24.40	751.89	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/09	776.29	0.00	25.00	751.29	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--
	07/16/09	776.29	0.00	24.95	751.34	341	188	3.3	16.9	14.9	<1	<1	1.9J	<1	21.0	--	--
	10/29/09	776.29	0.00	25.65	750.64	--	--	--	--	--	--	--	--	--	--	--	--
	01/14/10	776.29	0.00	25.65	750.64	ANNUAL	SAMPLE	POINT	--	--	--	--	--	--	--	--	--
	06/17/10	776.29	0.00	25.37	750.92	761	68.6	3.2	8.6	71.6	1.3J	<1	18.4	<1	13.9J	--	--
	09/16/10	776.29	0.00	25.55	750.74	1,650	46.9	18.0	1.2J	311	5.3	<2	67.6	<2	24.1J	--	--
	12/09/10	776.29	0.00	26.14	750.15	214	7.7	4.6	0.6J	42.9	1.5J	<1	17.5	<1	13.7J	--	--
	02/24/11	776.29	0.00	25.26	751.03	11,300	244**	97	8.2	2,310**	22.3	<1	123	<1	79.5	--	--
	05/26/11	776.29	0.00	25.00	751.29	1,470	199	59.6	7.4	55.7	<2	<2	29.5	<2	30.4	--	--
	12/08/11	776.29	0.00	26.08	750.21	140	2.3	3.9	1.9	11	3.9	<0.5	16	<0.5	20	--	--
	02/11/12	776.29	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	776.29	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	776.29	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	09/12/13	776.29	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
10/17/14	776.29	0.00	28.52	747.77	--	--	--	--	--	--	--	--	--	--	--	--	
RW-13 ~43-45 screen	02/01/05	766.39	0.00	23.00	743.39	49,000	7,400	11,000	2,000	7,500	34.J	<200	940	<200	<1000	--	--
	08/03/05	775.48	0.00	21.99	753.49	64,000	5,400	15,000	2,000	7,700	<200	<200	<200	<200	<1000	--	--
	11/02/05	775.48	0.00	22.85	752.63	84,000	9,000	13,000	2,000	6,700	<400	<400	<400	<400	<1000	--	--
	01/30/06	775.48	0.00	22.85	752.63	58,000	10,000	18,000	2,500	9,900	<200	<200	<200	<200	<1000	--	--
	05/23/06	775.46	0.00	20.00	755.48	2100	62.0	220	13.0	170	<10	<10	560	<10	790	--	--
	08/16/06	775.48	0.00	22.05	753.43	35,000	2,000	3,600	1,200	5,600	<10	<10	330	<10	500	--	--
	11/01/06	775.48	0.00	22.92	752.56	40,000	3,800	4,600	1,900	5,000	<100	<100	220	<100	<500	--	--
	01/31/07	775.48	0.00	22.35	753.13	58,000	5,800	1,900	1,700	4,000	<100	<100	190	<100	<500	--	--
	05/02/07	775.48	0.00	22.83	752.65	7,700	1,500	160	380	550	<40	<40	2,200	<40	320	--	--
	08/20/07	775.48	0.00	21.88	753.60	2,500	230	23.0	67.0	400	<20	<20	580	<20	<100	--	--
	11/27/07	775.48	0.00	23.49	751.99	2,900	430	23.0	110	179	<20	<20	1,800	<20	100	--	--
	02/26/08	775.48	0.00	23.24	752.24	1,800	65.0	73.0	30.0	270	<20	<20	63	<20	<100	--	--
	05/21/08	775.48	0.00	23.49	751.99	280	38.0	0.77	1.9	29.0	<2	<2	130	<2	11.0	--	--
	08/12/08	775.48	0.00	24.12	751.36	2,700	290	22.0	8.0	450	5.2	<2	470	<2	130	--	--
	11/05/08	775.48	0.00	24.55	750.93	1,500	560	3.2	37.0	46.0	<10	<10	1,000	<10	350	--	--
	01/14/09	775.48	0.00	24.42	751.06	<100	3.6	<0.5	0.66	<1.5	<2	<2	<2	<2	<10	--	--
	07/16/09	775.48	0.00	24.97	750.51	174	109	2.6	10.4	9.1	<1	<1	11.1	<1	<10	--	--
	10/29/09	775.48	0.00	25.35	750.13	850	25.1	71.7	9.4	294	<1	<1	2.7	<1	<10	--	--
	01/14/10	775.48	0.00	25.35	750.13	2,210	93.2	285**	5.3	534**	<1	<1	2.9	<1	<10	--	--
	06/17/10	775.48	0.00	25.46	750.02	7,380	56.6	157	13.5	1,410	<5	<5	29.4	<5	263	--	--
	09/16/10	775.48	0.00	25.71	749.77	2,610	21.6	46.4	<1	723	7.5	<2	77.1	<2	269	--	--
	12/09/10	775.48	0.00	26.23	749.25	778	16.0	15.2	3.5	166	<2.5	<2.5	79.0	<2.5	197	--	--
	02/24/11	775.48	0.00	25.35	750.13	542	43.0	1.0	9.2	17.9	<1	<1	157	<1	193	--	--
05/26/11	775.48	0.00	23.11	752.37	2,520	104	45.7	9.5	398	<1	<1	3.9	<1	<10	--	--	
12/08/11	775.48	0.00	26.22	749.26	408	34	6.1	37	19	6.1	<0.5	46	<0.5	340	--	--	
02/11/12	775.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
05/17/12	775.48	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11/19/12	775.48	0.00	26.67	748.81	231	22	0.5	20	1.3	4.9	<0.5	21	<0.5	730	--	--	
09/12/13	775.48	0.00	27.31	748.17	56	1.2	<0.5	<0.5	<0.5	3.4	<0.5	15	<0.5	340	--	--	
10/17/14	775.48	0.00	28.45	747.03	<50	<0.5	<0.5	<0.5	<0.5	0.86	<0.5	3.1	<0.5	52	--	--	
RW-14 ~10-45 screen	09/17/11	775.95	0.00	24.91	751.04	514	51	49	11	62	14	<0.5	5.8	<0.5	440	<0.5	--
	12/08/11	775.95	0.00	25.10	750.85	7,090	1,200	240	220	400	22	<10	22	<10	620	--	--
	02/11/12	775.95	0.00	26.36	749.59	--	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	775.95	0.00	25.24	750.71	934	220	17	41	50	30	<1	19	<1	960	8.1	4.2
	11/19/12	775.95	0.00	25.24	750.71	--	--	--	--	--	--	--	--	--	--	--	--
	09/12/13	775.95	0.36	26.91	749.31	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/17/14	775.95	1.65	28.80	748.39	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/17/14	775.95	1.65	28.80	748.39	FPH	--	--	--	--	--	--	--	--	--	--	--
EZ-1 ~20-40 screen	02/10/10	783.96	0.00	28.38	755.58	190,000	32,000	29,000	3,360	17,000	208	<100	<100	<100	<1,000	--	--
	06/17/10	783.96	0.00	28.16	755.80	192,000	30,400	28,200	4,010	21,200	<200	<200	<200	<200	<1,100	--	--
	09/17/10	783.96	0.00	27.95	756.01	293,000	31,400	35,900	3,150	21,200	218	<200	<200	<200	<2,000	--	--
	12/08/10	783.96	0.30	29.03	755.16	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/23/11	783.96	0.12	28.53	755.52	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	783.96	FP Present - measurement not recorded	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/09/11	783.96	0.11	29.14	754.90	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/11/12	783.96	0.70	29.50	754.99	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/17/12	783.96	0.56	30.34	754.04	FPH	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	783.96	--	--	--	Vehicle Parked On Well	--	--	--	--	--	--	--	--	--	--	--
	09/14/13	783.96	1.18	30.88	753.97	FPH	--	--	--	--	--	--	--	--	--	--	--
10/17/14	783.96	--	--	--	No Access - Not gauged or sampled	--	--	--	--	--	--	--	--	--	--	--	
EZ-2 ~20-40 screen	02/10/10	782.96	0.00	27.48	755.48	149,000	14,300	31,500	2,730	13,000	<100	<100	<100	<100	<1,000	--	--
	06/17/10	782.96	0.00	27.25	755.71	130,000	13,300	27,000	3,110	14,100	<200	<200	<200	<200	<2,000	--	--
	09/17/10	782.96	0.00	27.11	755.85	159,000	12,900	27,900	2,470	13,600	<50	<50	<50	<50	1,330	--	--
	12/08/10	782.96	0.00	27.88	755.08	107,000	11,900	29,500	2,910	15,100	<100	<100	<100	<100	1,080	--	--
	02/23/11	782.96	Connected to SVE System	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	782.96	Connected to HVDPE System	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/09/11	782.96	0.00	27.91	755.05	219,000	9,600	25,000	2,100	14,000	<250	<250	<250	<250	<2,500		

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)
EZ-3	04/15/10	781.44	3.56	29.81	754.30	FPH	--	--	--	--	--	--	--	--	--	--	--
	04/20/10	781.44	3.14	29.71	754.09	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/03/10	781.44	4.48	30.91	753.89	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/12/10	781.44	3.05	29.72	754.01	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/20/10	781.44	2.44	29.12	754.15	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/25/10	781.44	1.60	28.54	754.10	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/03/10	781.44	2.15	28.90	754.15	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/08/10	781.44	1.62	28.50	754.16	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/15/10	781.44	0.77	28.58	753.44	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/17/10	781.44	1.09	28.00	754.26	186,000	15,200	30,800	2,730	33,400	<400	<400	<400	<400	<4,000	--	--
	06/22/10	781.44	1.17	28.17	754.15	FPH	--	--	--	--	--	--	--	--	--	--	--
	06/30/10	781.44	1.73	28.61	754.13	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/16/10	781.44	Connected to SVE System			--	--	--	--	--	--	--	--	--	--	--	--
	12/08/10	781.44	1.43	29.06	753.45	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/23/11	781.44	Connected to SVE System			--	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	781.44	Connected to HVDPE System			--	--	--	--	--	--	--	--	--	--	--	--
	12/10/11	781.44	0.21	27.97	753.63	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/11/12	781.44	0.05	28.90	752.58	FPH - Sampling Not required in 1Q12			--	--	--	--	--	--	--	--	--
	05/17/12	781.44	3.89	31.55	752.81	FPH	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	781.44	3.50	31.04	753.03	FPH	--	--	--	--	--	--	--	--	--	--	--
09/14/13	781.44	3.04	31.34	752.38	FPH	--	--	--	--	--	--	--	--	--	--	--	
10/17/14	781.44	--	--	--	No Access - Not gauged or sampled												
EZ-4 ~20-40 screen	09/16/10	780.90	1.30	29.89	751.99	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/08/10	780.90	0.45	30.58	750.66	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/23/11	780.90	0.05	29.22	751.72	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	780.90	0.03	29.45	751.47	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/10/11	780.90	0.62	30.74	750.63	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/11/12	780.90	0.17	31.22	749.81	Sampling Not required in 1Q12			--	--	--	--	--	--	--	--	--
	05/17/12	780.90	0.87	31.24	750.31	FPH	--	--	--	--	--	--	--	--	--	--	--
	11/19/12	780.90	0.47	31.45	749.80	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/14/13	780.90	0.25	31.59	749.50	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/18/14	780.90	0.12	32.65	748.34	116,000	6,900	17,000	4,400	21,000	<100	<100	<100	<100	<1000	--	--
EZ-5 ~20-40 screen	09/16/10	780.31	0.00	26.21	754.10	98,700	13,200	11,100	1,770	13,000	<50	<50	<50	<50	1,090	--	--
	12/08/10	780.31	0.00	26.93	753.38	104,000	18,600	13,100	2,970	18,900	<100	<100	<100	<100	<1,000	--	--
	02/23/11	780.31	0.05	27.38	752.97	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	780.31	0.01	28.04	752.28	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/10/11	780.31	0.00	26.92	753.39	104,000	14,000	7,800	1,800	7,500	<200	<200	<200	<200	<2000	<200	--
	02/11/12	780.31	0.00	28.05	752.26	Sampling Not required in 1Q12			--	--	--	--	--	--	--	--	--
	05/17/12	780.31	0.00	27.43	752.88	82,200	18,000	8,700	2,100	11,000	22	<5	<5	<5	640	12	4.5
	11/19/12	780.31	0.05	27.42	752.93	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/14/13	780.31	0.05	28.04	752.31	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/18/14	780.31	0.05	29.05	751.30	102,000	7,800	11,000	3,500	23,000	<50	<50	<50	<50	<500	--	--
EZ-6 ~13-33 screen	09/16/10	769.50	0.00	20.05	749.45	145,000	4,990	18,100	5,310	30,000	<100	<100	<100	<100	<1,000	--	--
	12/08/10	769.50	0.01	20.35	749.16	FPH	--	--	--	--	--	--	--	--	--	--	--
	02/23/11	769.50	0.04	19.45	750.08	FPH	--	--	--	--	--	--	--	--	--	--	--
	05/26/11	769.50	0.02	19.54	749.98	FPH	--	--	--	--	--	--	--	--	--	--	--
	12/10/11	769.50	0.01	20.29	749.22	47,200	960	1,100	1,800	7,700	<50	<50	<50	<50	<500	<50	--
	02/11/12	769.50	0.00	20.98	748.52	Sampling Not required in 1Q12			--	--	--	--	--	--	--	--	--
	05/17/12	769.50	0.03	20.31	749.21	24,700	1,100	1,900	1,700	7,000	<12.5	<12.5	<12.5	<12.5	<125	<12.5	4.1
	11/19/12	769.50	0.03	20.84	748.68	FPH	--	--	--	--	--	--	--	--	--	--	--
	09/14/13	769.50	1.02	21.84	748.43	FPH	--	--	--	--	--	--	--	--	--	--	--
	10/18/14	769.50	1.95	23.99	746.97	FPH	--	--	--	--	--	--	--	--	--	--	--
EZ-7 ~13-33 screen	01/15/11	768.23	0.00	18.00	750.23	2,500	4.9	5.9	16	422	7.3	<1	<1	<1	<10	75	--
	02/24/11	768.23	0.00	18.26	749.97	133	1.3	<0.5	1.2	0.5	7.1	<0.5	<0.5	<0.5	<5.0	67	--
	05/27/11	768.23	0.00	18.38	749.85	99	0.8	3.6	2.1	6.1	4.3	<0.5	<0.5	<0.5	<5.0	52	--
	12/10/11	768.23	0.00	19.11	749.12	75.9	2.5	2.3	0.6	3.4	3.5	<0.5	<0.5	<0.5	<5	43	--
	02/11/12	768.23	0.00	19.69	748.54	Sampling Not required in 1Q12			--	--	--	--	--	--	--	--	--
	05/17/12	768.23	0.00	19.10	749.13	96.8	5.1	15	2.4	12	2.4	<0.5	<0.5	<0.5	<5	31	5.2
	11/19/12	768.23	0.00	19.63	748.60	110	4.5	18	3.2	23	3.3	<0.5	<0.5	<0.5	<5	--	--
	09/14/13	768.23	0.00	20.06	748.17	<50	1.2	1.4	1.3	8.3	3.5	<0.5	<0.5	<0.5	<5	--	--
	10/18/14	768.23	0.00	21.25	746.98	<50	<0.5	<0.5	<0.5	0.50	<0.5	<0.5	<0.5	<0.5	<5	--	--
	EZ-8 ~12-32 screen	01/08/11	769.42	0.00	18.81	750.61	158	<0.5	<0.5	<0.5	0.7	<0.5	<0.5	<0.5	<0.5	<5	1.6
02/23/11		769.42	0.00	18.99	750.43	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	5.9	--
05/27/11		769.42	0.00	19.21	750.21	56	1.0	2.4	<0.5	3.6	0.6	<0.5	<0.5	<0.5	<5.0	6.3	--
09/17/11		769.42	0.00	19.87	749.55	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	--
12/10/11		769.42	0.00	20.02	749.40	<50	2.6	0.9	<0.5	0.7	<0.5	<0.5	<0.5	<0.5	<5	3.0	--
02/11/12		769.42	0.00	20.11	749.31	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
05/17/12		769.42	0.00	20.07	749.35	<50	0.8	2.3	<0.5	1.6	<0.5	<0.5	<0.5	<0.5	<5	2.8	5.1
11/19/12		769.42	0.00	20.55	748.87	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
09/14/13		769.42	0.00	21.00	748.42	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--
10/18/14		769.42	0.00	22.20	747.22	<50	<0.5	<0.5	<0.5	4.2	<0.5	<0.5	<0.5	<0.5	<5	--	--
EZ-9 ~14-34 screen	01/08/11	772.83	0.00	21.71	751.12	1,530	65	242	26	253	34	<1	<1	<1	<10	92	--
	02/23/11	772.83	0.00	21.78	751.05	3,030	272	282	142	523	44	<5.0	<5.0	<5.0	<50.0	127	--
	05/27/11	772.83	0.00	21.99	750.84	7,040	690	1,030	257	741	30	<5.0	<5.0	<5.0	<50.0	84	--
	09/17/11	772.83	0.00	22.62	750.21	3,220	380	210	190	270	46	<5	<5	<5	<50	<5	--
	12/10/11	772.83	0.00	22.82	750.01</												

**TABLE 4  
CUMULATIVE FLUID LEVEL MONITORING AND ANALYTICAL DATA  
COMMINGLED PLUME CP0050 - THRU OCTOBER 2014**

**Rapid Gas #37 and Former EZ Serve ARCO Station (1216) 6020 and 6050 Arlington Avenue, Riverside, CA**

Well ID	Date Monitored	TOC El. (feet)	FPH Thickness (feet)	Depth to Water (feet)	GW El. (feet)	TPH-G (ug/l)	Benzene (ug/l)	Toluene (ug/l)	Ethyl-benzene (ug/l)	Total Xylenes (ug/l)	DIPE (ug/l)	ETBE (ug/l)	MTBE (ug/l)	TAME (ug/l)	TBA (ug/l)	1,2 DCA (ug/l)	Dissolved O <sub>2</sub> (mg/l)	
EZ-9	09/14/13	772.83	0.04	24.13	748.73	11,000	280	2900	540	2,700	<20	<20	<20	<20	<200	--	--	
	10/18/14	772.83	0.18	25.23	747.74	137,000	810	21,000	8,300	59,000	<100	<100	<100	<100	<1000	--	--	
EZ-10 ~14-34 screen	01/08/11	773.36	0.00	21.63	751.73	528	1.2	39	15	111	1.5	<0.5	<0.5	<0.5	<5	7.1	--	
	02/23/11	772.95	0.00	21.64	751.31	1,830	20	50	84	200	1.5	<1.0	<1.0	<1.0	<10.0	7.9	--	
	05/26/11	772.95	0.00	21.87	751.08	479	17	10	50	19	1.1	<0.5	<0.5	<0.5	<5.0	5.6	--	
	09/17/11	772.95	0.00	22.51	750.44	213	8.5	1.2	32	2.4	2	<0.5	<0.5	<0.5	<5	<0.5	--	
	12/10/11	772.95	0.00	22.76	750.19	142	8.8	5.5	8.1	6.8	1.2	<0.5	<0.5	<0.5	<5	5.4	--	
	02/11/12	772.95	0.00	22.88	750.07	<50	2.2	<0.5	4.6	<0.5	1.5	<0.5	<0.5	<0.5	<5	--	--	
	05/17/12	772.95	0.00	22.97	749.98	89.8	1.5	2.0	5.3	2.6	1.1	<0.5	<0.5	<0.5	<5	4.6	3.8	
	11/19/12	772.95	0.00	23.44	749.51	<50	0.6	<0.5	1.4	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--	
	09/14/13	772.95	0.00	23.87	749.08	<50	<0.5	<0.5	0.9	<0.5	<0.5	<0.5	<0.5	<0.5	<5	--	--	
	10/18/14	772.95	0.00	25.04	747.91	<50	0.646	0.667	0.575	6.92	<0.5	<0.5	<0.5	<0.5	<5	--	--	
EZ-11 ~20-40 screen	01/15/11	781.87	0.00	30.10	751.77	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5	1.0	--	
	02/24/11	781.87	0.00	30.19	751.68	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	0.6	--	
	05/26/11	781.87	0.00	30.45	751.42	<50	<0.5	0.7	<0.5	1.2	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	--	
	12/10/11	781.87	0.00	31.28	750.59	130	1.8	8.1	1.5	12	<0.5	<0.5	<0.5	<0.5	<5	1.1	--	
	02/11/12	781.87	0.00	32.26	749.61	Sampling Not required in 1Q12		--	--	--	--	--	--	--	--	--	--	
	05/17/12	781.87	0.00	31.56	750.31	81.7	0.5	4.8	2.0	13	0.7	<0.5	<0.5	<0.5	7.1	1.6	3.7	
	11/19/12	781.87	0.00	32.03	749.84	<50	0.8	2.2	<0.5	3.1	<0.5	<0.5	<0.5	<0.5	6.3	--	--	
	09/14/13	781.87	0.00	32.45	749.42	<50	<0.5	1.2	0.6	4.4	<0.5	<0.5	<0.5	<0.5	<5	--	--	
	10/18/14	781.87	0.00	31.07	750.80	<50	<0.5	<0.5	0.683	0.84	<0.5	<0.5	<0.5	<0.5	<5	--	--	
	EZ-12 ~17-37 screen	09/17/11	778.49	0.02	27.31	751.20	299,000	23,000	31,000	4,900	28,000	<200	<200	<200	<200	<2000	<200	--
12/10/11		778.49	1.36	28.55	750.96	--	--	--	--	--	--	--	--	--	--	--	--	
02/11/12		778.49	1.35	29.62	749.88	FPH - Sampling Not required in 1Q12		--	--	--	--	--	--	--	--	--	--	
05/17/12		778.49	1.46	28.85	750.74	--	--	--	--	--	--	--	--	--	--	--	--	
11/19/12		778.49	1.50	29.15	750.47	FPH	--	--	--	--	--	--	--	--	--	--	--	
09/14/13		778.49	1.67	29.94	749.80	FPH	--	--	--	--	--	--	--	--	--	--	--	
10/18/14		778.49	1.88	31.31	748.59	FPH	--	--	--	--	--	--	--	--	--	--	--	
EZ-13 ~17-37 screen		09/17/11	775.18	0.00	24.84	750.34	78,000	9,900	6,100	2,000	11,000	<50	<50	<50	<50	<500	<50	--
		12/10/11	775.18	0.00	25.02	750.16	46,000	5,100	5,000	880	5,400	<50	<50	<50	<50	<500	<50	--
		02/11/12	775.18	0.00	26.02	749.16	Sampling Not required in 1Q12		--	--	--	--	--	--	--	--	--	--
	05/17/12	775.18	0.00	25.11	750.07	19,900	3,300	2,200	560	2,800	21	<5	<5	<5	60	<5	3.7	
	11/19/12	775.18	0.00	25.54	749.64	15,400	2,600	1,800	450	2,300	25	<5	<5	<5	60	--	--	
	09/14/13	775.18	1.66	27.40	749.03	FPH	--	--	--	--	--	--	--	--	--	--	--	
	10/18/14	775.18	0.34	27.54	747.90	FPH	--	--	--	--	--	--	--	--	--	--	--	
EZ-14 ~17-37 screen	09/17/11	770.80	0.00	20.87	749.93	2,140	190	160	120	320	16	<1	<1	<1	20	<1	--	
	12/10/11	770.80	1.87	22.50	749.70	FPH	--	--	--	--	--	--	--	--	--	--	--	
	02/11/12	770.80	1.45	23.19	748.70	Sampling Not required in 1Q12		--	--	--	--	--	--	--	--	--	--	
	05/17/12	770.80	1.76	22.47	749.65	FPH	--	--	--	--	--	--	--	--	--	--	--	
	11/19/12	770.80	1.80	23.02	749.13	FPH	--	--	--	--	--	--	--	--	--	--	--	
	09/14/13	770.80	1.85	23.53	748.66	FPH	--	--	--	--	--	--	--	--	--	--	--	
	10/18/14	770.80	1.70	24.56	747.52	FPH	--	--	--	--	--	--	--	--	--	--	--	
EZ-15 ~20-40 screen	05/17/12	785.35	0.00	30.91	754.44	136,000	2,700	35,000	2,700	20,000	<50	<50	<50	<50	<500	<50	4.4	
	11/19/12	785.35	0.00	30.78	754.57	119,000	2,300	33,000	3,000	20,000	<200	<200	<200	<200	<2,000	--	--	
	09/14/13	785.35	0.09	31.38	754.04	FPH	--	--	--	--	--	--	--	--	--	--	--	
	10/17/14	785.35	--	--	--	No Access - Not gauged or sampled		--	--	--	--	--	--	--	--	--	--	
EZ-16 ~20-40 screen	05/17/12	782.28	0.00	27.93	754.35	182,000	28,000	36,000	2,600	15,000	85	<50	<50	<50	970	330	--	
	11/19/12	782.28	0.00	27.76	754.52	147,000	24,000	32,000	2,700	15,000	<100	<100	<100	<100	<1,000	--	--	
	09/14/13	782.28	0.00	28.33	753.95	Sampling Not required in 3Q13		--	--	--	--	--	--	--	--	--	--	
	10/17/14	782.28	--	--	--	No Access - Not gauged or sampled		--	--	--	--	--	--	--	--	--	--	
EZ-17 ~17-37 screen	05/17/12	783.97	0.00	29.78	754.19	59,300	4,800	13,000	2,700	9,400	17	<5	<5	<5	110	21	3.1	
	11/19/12	783.97	0.00	29.75	754.22	69,400	4,300	14,000	2,500	9,600	<50	<50	<50	<500	--	--		
	09/12/13	783.97	--	--	--	Sampling Not required in 3Q13		--	--	--	--	--	--	--	--	--	--	
	10/17/14	783.97	--	--	--	No Access - Not gauged or sampled		--	--	--	--	--	--	--	--	--	--	
EZ-18* ~32-42 screen	11/19/12	786.87	0.00	32.29	754.58	20	24	570	1,100	6,600	<5	<5	<5	<5	<50	<5	--	
	09/12/13	786.87	--	--	--	Sampling Not required in 3Q13		--	--	--	--	--	--	--	--	--	--	
	10/17/14	786.87	--	--	--	No Access - Not gauged or sampled		--	--	--	--	--	--	--	--	--	--	
QCTB-1	01/14/09	--	--	--	--	<100	<0.5	<0.5	<0.5	<1.5	<2	<2	<2	<2	<10	--	--	

**Notes:**

- |  |  |
|--|--|
| TPH-G = total petroleum hydrocarbons with gasoline distinction | ug/L = micrograms per liter (ppb)                |
| MTBE = methyl tertiary butyl ether                             | HVDPE = high vacuum dual phase extraction system |
| DIPE = di-isopropyl ether                                      | SVE = Soil Vapor Extraction system               |
| ETBE = ethyl-tert-butyl ether                                  | El. = Elevation                                  |
| TAME = tert-amyl methyl ether                                  | FPH = Free phase hydrocarbons                    |
| TBA = tert butanol   | -- = Not detected, sampled, measured or analyzed |
| 1,2 DCA = 1,2 Dichloroethane                                   | TOC = top of casing                              |
| mg/L = milligrams per liter (ppm)                              | * = analyses completed by EPA Method 8021        |

\*Groundwater Elevations reported in feet above mean sea level.

\*Groundwater monitoring wells EZ-1 thru EZ-3 and MW-7 surveyed on 2-10-2010 by WM Surveys.

\*Groundwater monitoring wells EZ-4 thru EZ-6 surveyed on 9-13-2010 by WM Surveys.

\*Groundwater monitoring wells EZ-7 thru EZ-11 surveyed on 1-15-2011 by WM Surveys.

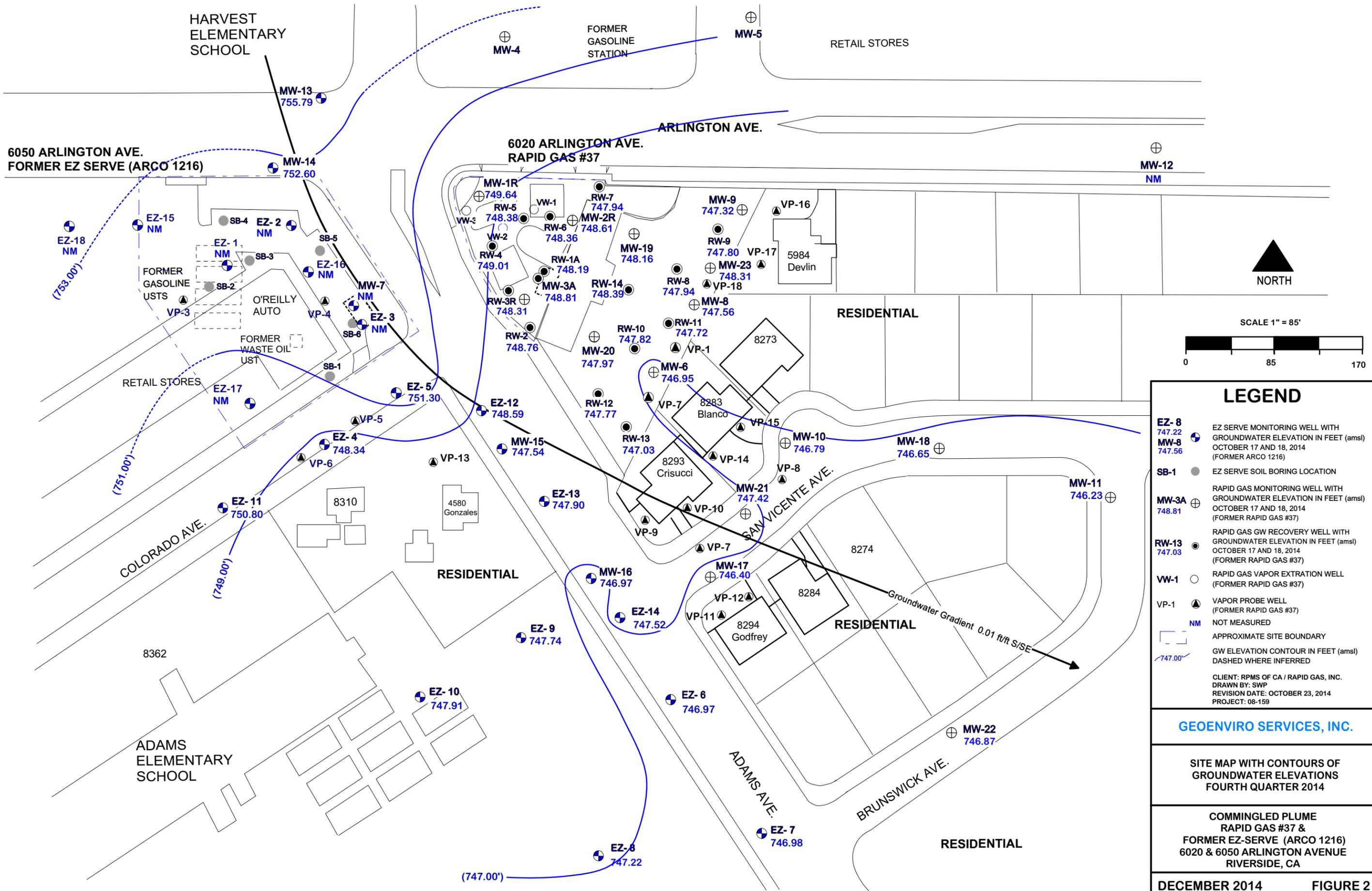
\*Groundwater monitoring wells EZ-12 thru EZ-14 surveyed on 9-17-2011 by WM Surveys.

\*Groundwater monitoring wells EZ-15 thru EZ-17 surveyed on 3-20-2012 by WM Surveys.

EZ-18\* = Additionally analyzed for Carbon Chain Breakdown on 11-20-2012. Low Diesel range hydrocarbon detected at 0.54 milligrams per liter in 11-20-2012. No Oil Range detected.

**APPENDIX C**

**MOST RECENT GROUNDWATER ELEVATION MAP AND ISOCONCENTRATION  
MAPS SHOWING DATA FOR BOTH SITES (Q4-2014)**



### LEGEND

- EZ-8**  
747.22  
**MW-8**  
747.56

  - EZ SERVE MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) OCTOBER 17 AND 18, 2014 (FORMER ARCO 1216)

- **SB-1**

  - EZ SERVE SOIL BORING LOCATION

- ⊕ **MW-3A**  
748.81

  - ⊕ RAPID GAS MONITORING WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) OCTOBER 17 AND 18, 2014 (FORMER RAPID GAS #37)

- **RW-13**  
747.03

  - RAPID GAS GW RECOVERY WELL WITH GROUNDWATER ELEVATION IN FEET (amsl) OCTOBER 17 AND 18, 2014 (FORMER RAPID GAS #37)

- **VW-1**

  - RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)

- ▲ **VP-1**

  - ▲ VAPOR PROBE WELL (FORMER RAPID GAS #37)

- NM**

  - NOT MEASURED

- 

  - APPROXIMATE SITE BOUNDARY

- (747.00')

  - GW ELEVATION CONTOUR IN FEET (amsl) DASHED WHERE INFERRED

CLIENT: RPMS OF CA / RAPID GAS, INC.  
DRAWN BY: SWP  
REVISION DATE: OCTOBER 23, 2014  
PROJECT: 08-159

GEOENVIRO SERVICES, INC.

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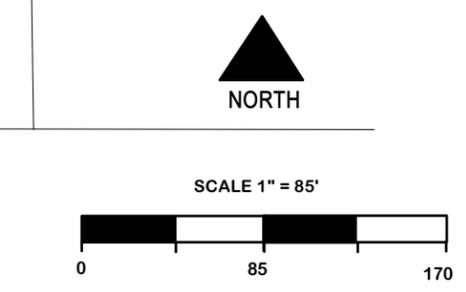
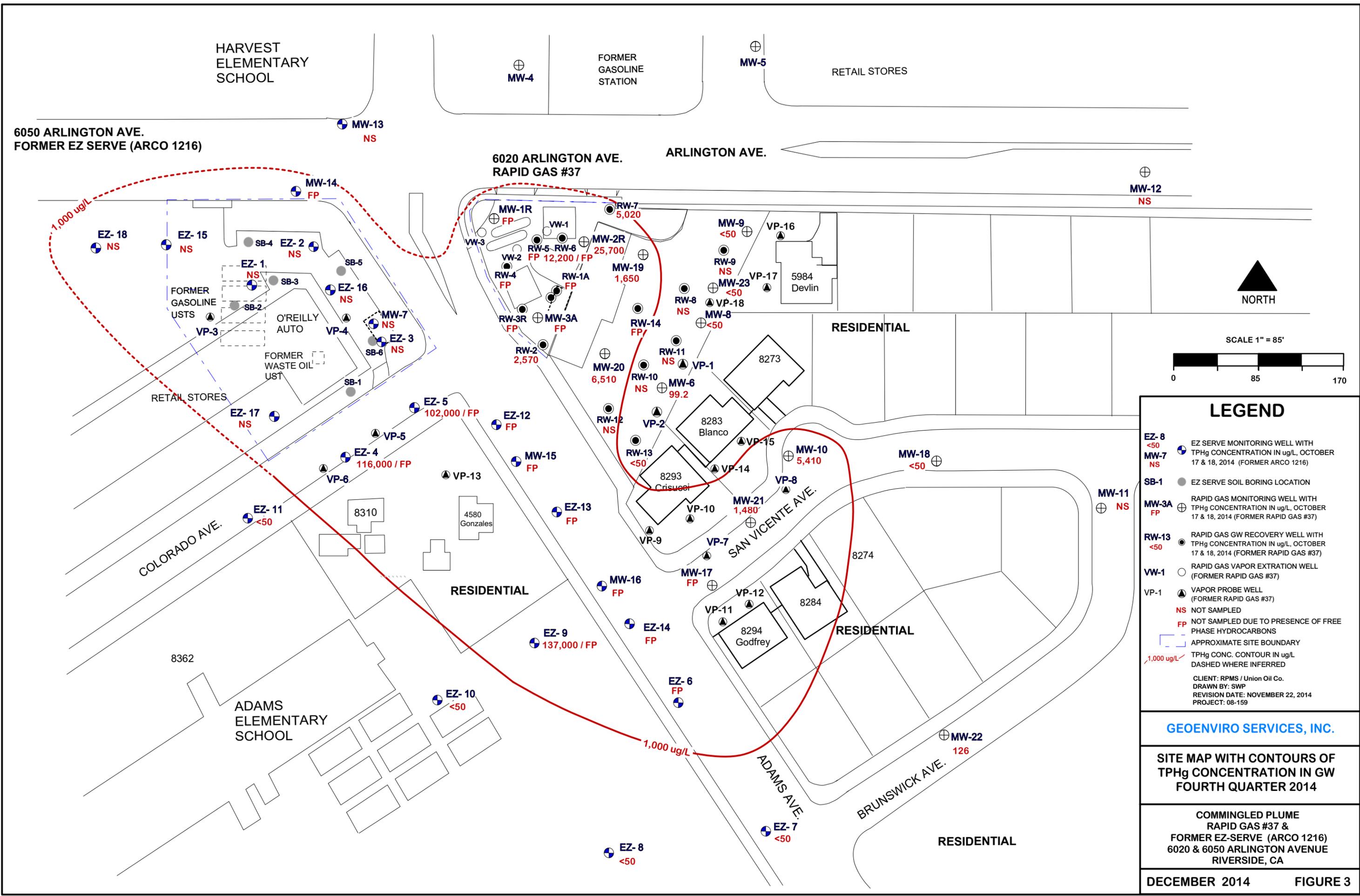
SITE MAP WITH CONTOURS OF GROUNDWATER ELEVATIONS FOURTH QUARTER 2014

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COMMINGLED PLUME  
RAPID GAS #37 &  
FORMER EZ-SERVE (ARCO 1216)  
6020 & 6050 ARLINGTON AVENUE  
RIVERSIDE, CA

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DECEMBER 2014      **FIGURE 2**



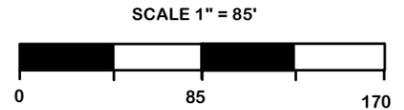
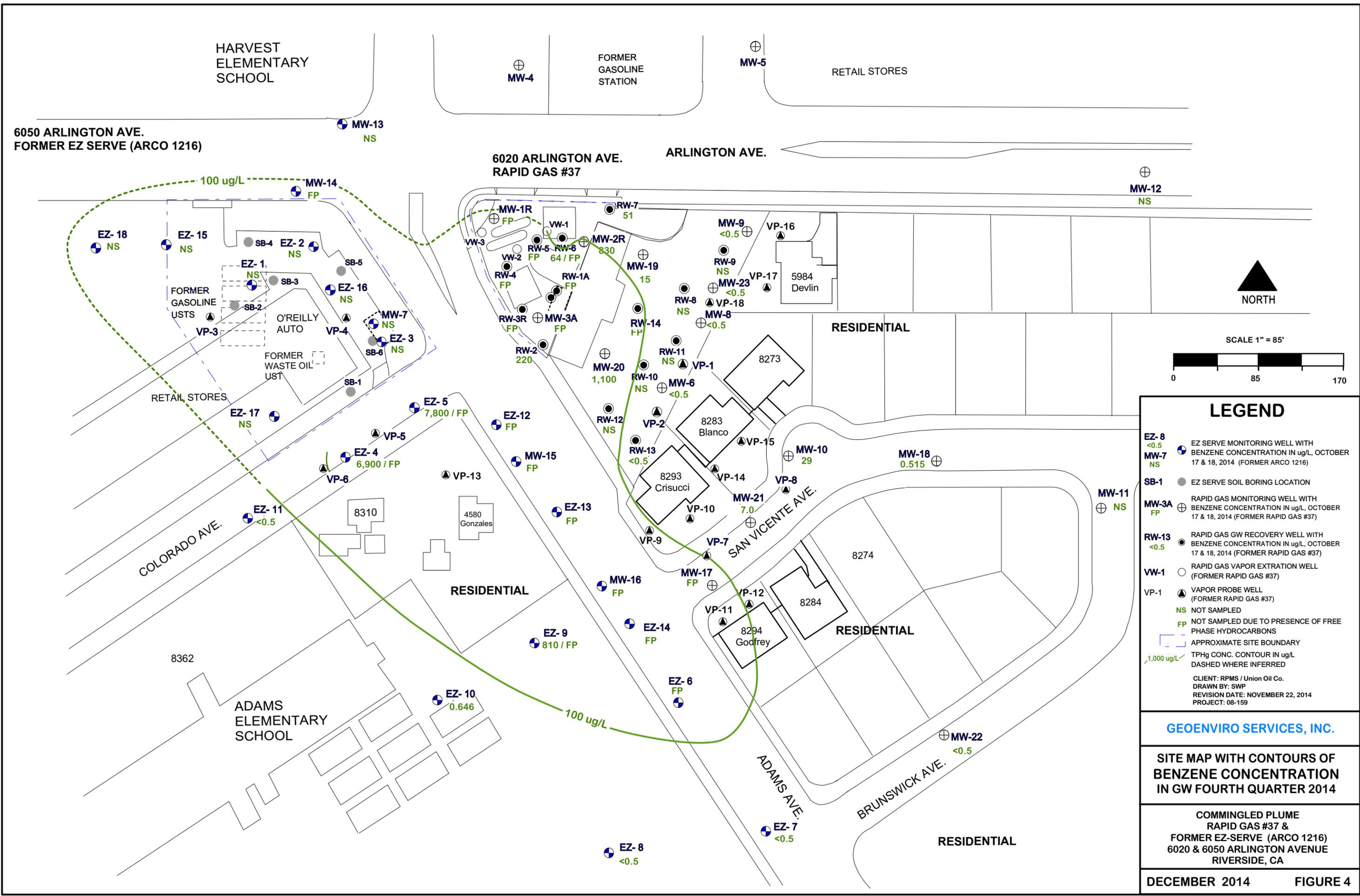
LEGEND	
EZ-8 <50	● EZ SERVE MONITORING WELL WITH TPHg CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER ARCO 1216)
MW-7 NS	⊕ RAPID GAS MONITORING WELL WITH TPHg CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
SB-1	● EZ SERVE SOIL BORING LOCATION
MW-3A FP	⊕ RAPID GAS MONITORING WELL WITH TPHg CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
RW-13 <50	● RAPID GAS GW RECOVERY WELL WITH TPHg CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
VW-1	○ RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)
VP-1	▲ VAPOR PROBE WELL (FORMER RAPID GAS #37)
NS	NOT SAMPLED
FP	NOT SAMPLED DUE TO PRESENCE OF FREE PHASE HYDROCARBONS
---	APPROXIMATE SITE BOUNDARY
---	TPHg CONC. CONTOUR IN ug/L DASHED WHERE INFERRED
CLIENT: RPMS / Union Oil Co. DRAWN BY: SWP REVISION DATE: NOVEMBER 22, 2014 PROJECT: 08-159	

**GEOENVIRO SERVICES, INC.**

**SITE MAP WITH CONTOURS OF TPHg CONCENTRATION IN GW FOURTH QUARTER 2014**

COMMINGLED PLUME  
RAPID GAS #37 &  
FORMER EZ-SERVE (ARCO 1216)  
6020 & 6050 ARLINGTON AVENUE  
RIVERSIDE, CA

DECEMBER 2014      FIGURE 3



### LEGEND

- ⊕ **EZ-8** ⊕ EZ SERVE MONITORING WELL WITH BENZENE CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER ARCO 1216)
- ⊕ **MW-7** ⊕ NS
- **SB-1** EZ SERVE SOIL BORING LOCATION
- ⊕ **MW-3A** ⊕ FP RAPID GAS MONITORING WELL WITH BENZENE CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
- **RW-13** ● <0.5 RAPID GAS GW RECOVERY WELL WITH BENZENE CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
- **VW-1** RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)
- ▲ **VP-1** VAPOR PROBE WELL (FORMER RAPID GAS #37)
- NS NOT SAMPLED
- FP NOT SAMPLED DUE TO PRESENCE OF FREE PHASE HYDROCARBONS
- APPROXIMATE SITE BOUNDARY
- 1,000 ug/L TPHg CONC. CONTOUR IN ug/L DASHED WHERE INFERRED

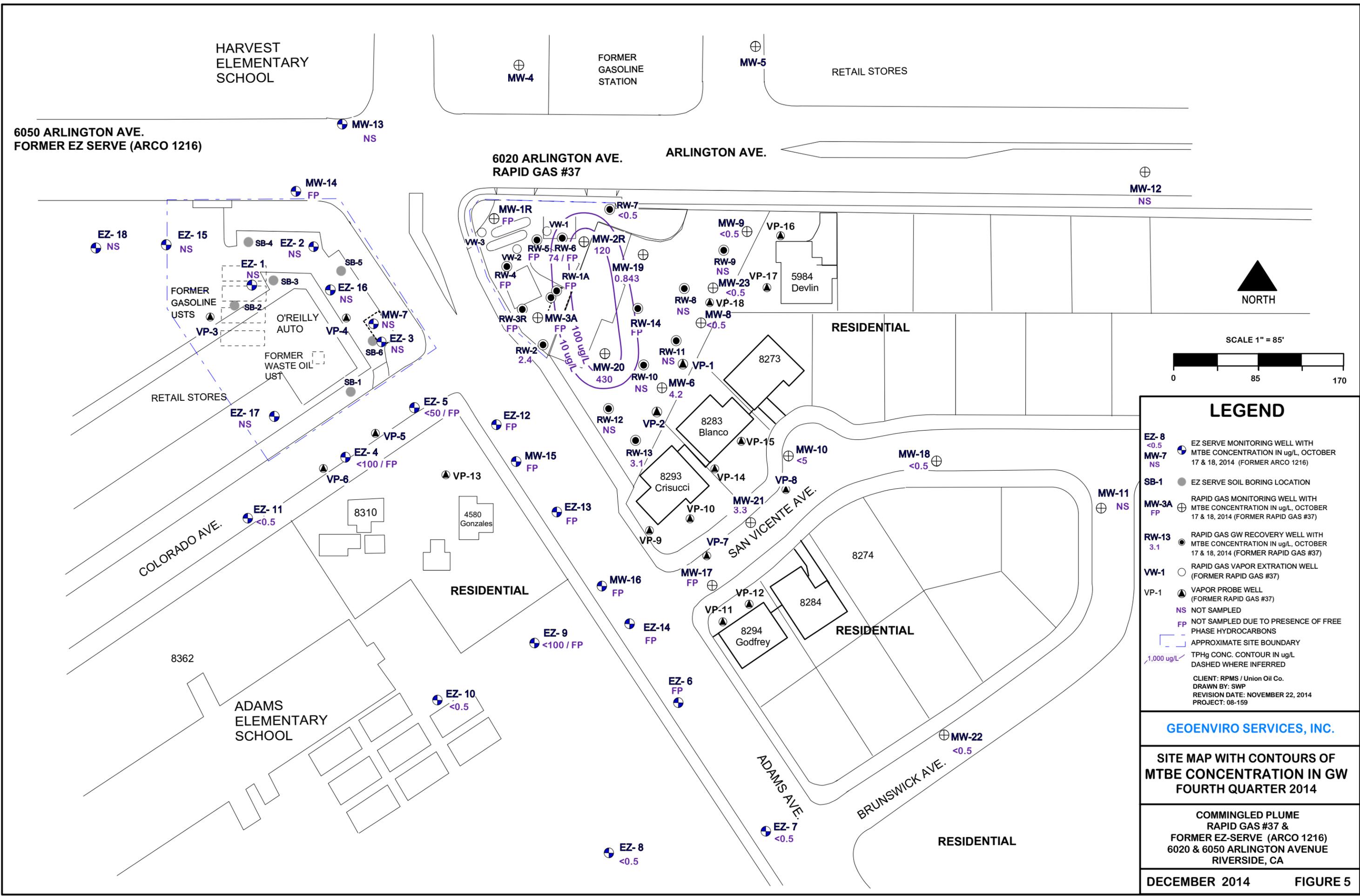
CLIENT: RPMS / Union Oil Co.  
DRAWN BY: SWP  
REVISION DATE: NOVEMBER 22, 2014  
PROJECT: 08-159

GEOENVIRO SERVICES, INC.

SITE MAP WITH CONTOURS OF BENZENE CONCENTRATION IN GW FOURTH QUARTER 2014

COMMINGLED PLUME  
RAPID GAS #37 &  
FORMER EZ-SERVE (ARCO 1216)  
6020 & 6050 ARLINGTON AVENUE  
RIVERSIDE, CA

DECEMBER 2014      FIGURE 4



### LEGEND

- EZ-8** **<0.5** EZ SERVE MONITORING WELL WITH MTBE CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER ARCO 1216)
- MW-7** **NS** NOT SAMPLED
- SB-1** EZ SERVE SOIL BORING LOCATION
- MW-3A** **FP** RAPID GAS MONITORING WELL WITH MTBE CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
- RW-13** **3.1** RAPID GAS GW RECOVERY WELL WITH MTBE CONCENTRATION IN ug/L, OCTOBER 17 & 18, 2014 (FORMER RAPID GAS #37)
- VW-1** RAPID GAS VAPOR EXTRACTION WELL (FORMER RAPID GAS #37)
- VP-1** VAPOR PROBE WELL (FORMER RAPID GAS #37)
- NS** NOT SAMPLED
- FP** NOT SAMPLED DUE TO PRESENCE OF FREE PHASE HYDROCARBONS
- APPROXIMATE SITE BOUNDARY
- TPHg CONC. CONTOUR IN ug/L DASHED WHERE INFERRED

CLIENT: RPMS / Union Oil Co.  
 DRAWN BY: SWP  
 REVISION DATE: NOVEMBER 22, 2014  
 PROJECT: 08-159

**GEOENVIRO SERVICES, INC.**

**SITE MAP WITH CONTOURS OF MTBE CONCENTRATION IN GW FOURTH QUARTER 2014**

COMMINGLED PLUME  
 RAPID GAS #37 &  
 FORMER EZ-SERVE (ARCO 1216)  
 6020 & 6050 ARLINGTON AVENUE  
 RIVERSIDE, CA

**DECEMBER 2014** **FIGURE 5**

**APPENDIX D**

**HISTORIC FREE PRODUCT MONITORING AND REMOVAL TABLES**

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-1	12/08/11	27.23	28.23	1.00	1.10	1.00	0.10	
	01/14/12	28.07	28.24	0.17	0.01	0.00	0.01	
	02/11/12	28.60	28.71	0.11	0.10	0.00	0.10	
	03/24/12	28.22	28.30	0.08	2.75	2.50	1.25	
	04/14/12	29.66	29.98	0.32	3.00	2.50	0.50	
	05/18/12	28.04	28.27	0.23	0.25	0.00	0.25	
	06/23/12	Dry	--	--	--	--	--	
	07/28/12	Dry	--	--	--	--	--	
	08/25/12	Dry	--	--	--	--	--	
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	Not Measured		--	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
02/23/13	Dry	--	--	--	--	--		
04/20/13	Dry	--	--	--	--	--		
05/18/13	Dry	--	--	--	--	--		
MW-1R	06/22/13	28.84	29.19	0.35	6.00	5.89	0.11	7
MW-1 Redrill	07/20/13	28.87	29.36	0.49	10.00	9.58	0.42	10
	08/15/13	29.00	29.67	0.67	--	--	--	
	08/17/13	29.07	29.75	0.68	46.00	45.36	0.64	15
	08/24/13	29.11	29.65	0.54	--	--	--	
	09/12/13	29.16	29.30	0.14	Connected to HVDPE			
	10/02/13	29.21	29.80	0.59	System Down for Repair			
	10/19/13	29.20	29.88	0.68	11.00	10.36	0.64	5
	10/29/13	29.22	29.78	0.56	Connected to HVDPE			
	11/16/13	--	--	--	Connected to HVDPE - Not extracting			
	12/14/13	--	--	--	Connected to HVDPE - Not extracting			
	12/20/13	29.60	30.55	0.95	Connected to HVDPE - Extracting			
	01/07/14	29.57	30.50	0.93	Connected to HVDPE - Extracting			
	01/16/14	29.58	30.54	0.96	Connected to HVDPE - Extracting			
	01/23/14	29.56	30.52	0.96	Connected to HVDPE - Extracting			
	01/27/14	29.57	30.51	0.94	Connected to HVDPE - Extracting			
	02/06/14	29.53	30.48	0.95	Connected to HVDPE - Extracting			
	02/24/14	29.72	30.63	0.91	Connected to HVDPE - Extracting			
	02/27/14	29.84	30.80	0.96	Connected to HVDPE - Extracting			
	03/27/14	29.85	30.80	0.95	Connected to HVDPE - Extracting			
	04/03/14	29.78	30.59	0.81	Connected to HVDPE - Extracting			
	04/25/14	--	30.18	0.00	Connected to HVDPE - Extracting			
	05/01/14	29.95	30.65	0.70	Connected to HVDPE - Not Extracting			
	05/17/14	29.97	30.88	0.91	Connected to HVDPE - Not Extracting			
	05/22/14	30.01	30.05	0.04	Connected to HVDPE - Extracting			
	06/06/14	30.00	30.09	0.09	Connected to HVDPE - Extracting			
	06/12/14	30.02	30.19	0.17	Connected to HVDPE - Extracting			
	06/19/14	30.10	30.18	0.08	Connected to HVDPE - Extracting			
	06/21/14	--	--	--	Connected to HVDPE - Extracting			
	06/26/14	--	30.00	0.00	Connected to HVDPE - Not Extracting			
	07/04/14	--	30.01	0.00	Connected to HVDPE - Not Extracting			
	07/10/14	--	30.03	0.00	Connected to HVDPE - Extracting			
	07/17/14	30.10	30.15	0.05	Connected to HVDPE - Extracting			
	07/19/14	30.14	31.43	1.29	Connected to HVDPE - Extracting			
	07/24/14	30.05	30.13	0.08	Connected to HVDPE - Extracting			
	07/31/14	30.09	30.11	0.02	Connected to HVDPE - Extracting			
	08/08/14	30.31	30.40	0.09	Connected to HVDPE - Extracting			
	09/04/14	--	30.45	0.00	Connected to HVDPE - Extracting			
	09/19/14	30.43	30.46	0.03	Connected to HVDPE - Extracting			
	09/24/14	31.07	31.20	0.13	Connected to HVDPE - Extracting			
	10/20/14	30.27	31.41	1.14	Connected to HVDPE - Not Extracting			
10/28/14	30.25	31.39	1.14	2.00	0.50	1.50	--	
11/06/14	30.55	30.93	0.38	Connected to HVDPE - Extracting				
11/13/14	30.57	31.07	0.50	Connected to HVDPE - Extracting				
11/21/14	30.55	31.80	1.25	Connected to HVDPE - Extracting				
11/24/14	30.60	32.00	1.40	Connected to HVDPE - Extracting				
12/05/14	--	--	--	2.30	0.50	1.80	--	
12/09/14	32.32	32.34	0.02	Connected to HVDPE - Extracting				
12/18/14	30.80	32.10	1.30	Connected to HVDPE - Extracting				
12/26/14	30.71	32.15	1.44	Connected to HVDPE - Extracting				
12/30/14	31.65	32.00	0.35	Disconnected - HVDPE Shutdown				
<b>Sub Total MW-1R:</b>						<b>78.20</b>	<b>7.31</b>	

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
MW-2	08/13/11	28.26	28.68	0.42	1.00	1.00	Sheen		
	9/24/11	28.37	28.78	0.41	1.00	1.00	Sheen		
	10/8/11	28.26	28.40	0.14	1.00	1.00	Sheen		
	11/14/11	28.55	29.05	0.50	1.00	1.00	Sheen		
	12/8/11	28.57	29.61	1.04	1.10	1.00	0.10		
	1/14/12	28.69	29.43	0.74	0.25	0.00	0.25		
	2/11/12	29.51	30.19	0.68	0.27	0.00	0.27		
	3/24/12	28.56	29.63	1.07	1.50	0.25	1.25		
	04/14/12	28.63	29.49	0.86	0.75	0.00	0.75		
	05/18/12	28.57	29.73	1.16	0.75	0.00	0.75		
	06/23/12	27.69	29.43	1.74	1.00	0.00	1.00		
	07/28/12	28.83	29.70	0.87	2.00	1.79	0.21	2	
	08/25/12	28.70	28.80	0.10	2.00	1.79	0.21	2	
	09/29/12	Not Measured		--	--	--	--	--	
	10/13/12	28.58	29.80	1.22	3.00	2.68	0.32	10	
	10/27/12	27.95	29.72	1.77	--	--	--		
	12/01/12	Not Measured		--	--	--	--		
	01/05/13	Not Measured		--	--	--	--		
02/23/13	Dry		--	--	--	--			
04/20/13	29.16	29.75	0.59	--	--	--			
05/18/13	29.30	29.98	0.68	--	--	--			
MW-2R	06/22/13	--	29.43	0.00	--	--	--		
MW-2 Redrill	07/20/13	29.61	30.13	0.52	5.00	4.79	0.21	10	
	08/15/13	29.93	29.96	0.03	--	--	--		
	08/17/13	30.03	30.40	0.37	10.00	9.89	0.11	10	
	08/24/13	30.10	30.12	0.02	--	--	--		
	09/12/13	30.20	30.24	0.04	--	--	--		
	10/02/13	29.89	29.91	0.02	--	--	--		
	10/19/13	--	29.89	0.00	--	--	--		
	11/16/13	--	--	--	Connected to HVDPE - Not extracting				
	12/14/13	--	--	--	Connected to HVDPE - Not extracting				
	01/11/14	--	--	--	Connected to HVDPE - Not extracting				
	01/11/14	30.28	30.35	0.07	Connected to HVDPE - Not extracting				
	02/08/14	30.76	30.89	0.13	Connected to HVDPE - Not extracting				
	02/24/14	30.69	30.79	0.10	Connected to HVDPE - Not extracting				
	02/27/14	30.68	30.80	0.12	Connected to HVDPE - Not extracting				
	03/27/14	29.05	30.82	1.77	Connected to HVDPE - Extracting				
	04/03/14	29.50	31.21	1.71	Connected to HVDPE - Extracting				
	04/25/14	--	29.90	0.00	Connected to HVDPE - Extracting				
	05/01/14	--	29.85	0.00	Connected to HVDPE - Extracting				
	05/22/14	--	29.42	0.00	Connected to HVDPE - Extracting				
	06/06/14	--	29.50	0.00	Connected to HVDPE - Extracting				
	06/12/14	--	29.40	0.00	Connected to HVDPE - Extracting				
	06/19/14	--	29.39	0.00	Connected to HVDPE - Extracting				
	06/21/14	--	--	--	Connected to HVDPE - Extracting				
	06/26/14	--	29.27	0.00	Connected to HVDPE - Extracting				
	07/04/14	--	29.26	0.00	Connected to HVDPE - Extracting				
	07/10/14	--	29.29	0.00	Connected to HVDPE - Extracting				
	07/17/14	30.75	30.80	0.05	Connected to HVDPE - Not Extracting				
	07/19/14	--	--	--	Connected to HVDPE - Not Extracting				
	07/24/14	30.81	30.84	0.03	Connected to HVDPE - Not Extracting				
	07/31/14	30.84	30.85	0.01	Connected to HVDPE - Not Extracting				
	08/08/14	30.98	31.10	0.12	Connected to HVDPE - Not Extracting				
	09/04/14	30.65	30.68	0.03	Connected to HVDPE - Extracting				
	09/19/14	30.66	30.67	0.01	Connected to HVDPE - Extracting				
09/24/14	--	31.20	0.00	Connected to HVDPE - Extracting					
10/02/14	--	31.12	0.00	Connected to HVDPE - Extracting					
10/10/14	--	31.15	0.00	Connected to HVDPE - Not Extracting					
10/20/14	--	31.10	0.00	Connected to HVDPE - Not Extracting					
11/06/14	31.65	31.69	0.04	Connected to HVDPE - Not Extracting					
11/21/14	31.67	31.74	0.07	0.13	0.10	0.03			
11/24/14	--	31.81	0.00	Connected to HVDPE - Not Extracting					
12/05/14	30.61	32.00	1.39	Connected to HVDPE - Extracting					
12/09/14	31.56	31.60	0.04	Connected to HVDPE - Not Extracting					
12/18/14	--	31.60	0.00	Connected to HVDPE - Not Extracting					
12/26/14	31.45	31.48	0.03	Connected to HVDPE - Not Extracting					
12/30/14	31.65	31.70	0.05	Disconnected - HVDPE Shutdown					
<b>Sub Total MW-2/R:</b>						<b>26.29</b>	<b>5.46</b>		

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-3A	09/14/13	28.60	29.60	1.00	14.00	12.94	1.06	15
	10/02/13	--	28.45	0.00	--	--	--	
	10/19/13	28.43	29.44	1.01	--	--	--	
	11/15/13	28.81	29.80	0.99	Connected to HVDPE - Extracting			
	11/16/13	--	--	--	Connected to HVDPE - Extracting			
	11/26/13	29.80	29.95	0.15	Connected to HVDPE - Extracting			
	12/14/13	--	--	--	Connected to HVDPE - Extracting			
	12/20/13	29.90	30.70	0.80	Connected to HVDPE - Extracting			
	01/07/14	29.72	30.31	0.59	Connected to HVDPE - Extracting			
	01/16/14	29.70	30.29	0.59	Connected to HVDPE - Extracting			
	01/23/14	29.69	30.28	0.59	Connected to HVDPE - Extracting			
	01/27/14	29.71	30.30	0.59	Connected to HVDPE - Extracting			
	02/06/14	29.74	30.27	0.53	Connected to HVDPE - Extracting			
	02/24/14	29.09	30.13	1.04	Connected to HVDPE - Extracting			
	02/27/14	29.93	30.40	0.47	Connected to HVDPE - Extracting			
	03/27/14	29.89	30.20	0.31	Connected to HVDPE - Extracting			
	04/03/14	29.62	29.70	0.08	Connected to HVDPE - Extracting			
	04/25/14	--	30.06	0.00	Connected to HVDPE - Extracting			
	05/01/14	30.04	30.24	0.20	Connected to HVDPE - Extracting			
	05/22/14	--	30.20	0.00	Connected to HVDPE - Extracting			
	06/06/14	30.04	30.21	0.17	Connected to HVDPE - Extracting			
	06/12/14	30.05	30.20	0.15	Connected to HVDPE - Extracting			
	06/19/14	30.08	30.19	0.11	Connected to HVDPE - Extracting			
	06/21/14	--	--	--	Connected to HVDPE - Extracting			
	06/26/14	--	30.35	0.00	Connected to HVDPE - Extracting			
	07/04/14	--	30.34	0.00	Connected to HVDPE - Extracting			
	07/10/14	--	30.38	0.00	Connected to HVDPE - Extracting			
	07/17/14	--	30.36	0.00	Connected to HVDPE - Extracting			
	07/19/14	--	--	--	Connected to HVDPE - Extracting			
	07/24/14	--	31.52	0.00	Connected to HVDPE - Extracting			
	07/31/14	--	31.53	0.00	Connected to HVDPE - Extracting			
	08/08/14	31.16	31.21	0.05	Connected to HVDPE - Extracting			
	09/04/14	--	31.20	0.00	Connected to HVDPE - Extracting			
	09/19/14	--	31.22	0.00	Connected to HVDPE - Extracting			
09/24/14	31.35	31.39	0.04	Connected to HVDPE - Extracting				
10/02/14	31.59	31.65	0.06	Connected to HVDPE - Extracting				
10/10/14	--	31.15	0.00	Connected to HVDPE - Extracting				
10/20/14	29.30	30.29	0.99	Connected to HVDPE - Not Extracting				
10/28/14	29.80	30.31	0.51	1.25	0.50	0.75		
11/06/14	30.90	30.95	0.05	Connected to HVDPE - Extracting				
11/13/14	30.31	30.55	0.24	0.50	0.30	0.20		
11/21/14	30.40	30.90	0.50	Connected to HVDPE - Extracting				
11/24/14	30.64	30.67	0.03	Connected to HVDPE - Extracting				
12/05/14	30.60	30.61	0.01	Connected to HVDPE - Extracting				
12/09/14	30.76	30.81	0.05	Connected to HVDPE - Extracting				
12/18/14	30.80	31.30	0.50	Connected to HVDPE - Extracting				
12/26/14	31.13	31.15	0.02	Connected to HVDPE - Extracting				
12/30/14	30.25	30.65	0.40	Disconnected - HVDPE Shutdown				
<b>Sub Total MW-3A:</b>					<b>13.74</b>	<b>2.01</b>		
MW-6	07/22/13	--	26.95	0.00	--	--	--	
	07/30/13	--	27.00	0.00	--	--	--	
	08/07/13	--	27.08	0.00	--	--	--	
	08/15/13	--	27.14	0.00	--	--	--	
	08/24/13	--	27.22	0.00	--	--	--	
	09/12/13	--	27.35	0.00	--	--	--	
	10/02/13	--	27.34	0.00	--	--	--	
	01/11/14	--	27.60	0.00	--	--	--	
	02/08/14	--	27.76	0.00	--	--	--	
	03/15/14	--	27.70	0.00	--	--	--	
	04/12/14	--	27.77	0.00	--	--	--	
	05/17/14	--	27.91	0.00	--	--	--	
06/21/14	--	27.92	0.00	--	--	--		
07/19/14	--	28.10	0.00	--	--	--		

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
MW-6	11/06/14	--	28.63	0.00	--	--	--		
	11/13/14	--	28.61	0.00	--	--	--		
	11/21/14	--	28.73	0.00	--	--	--		
	11/24/14	--	28.74	0.00	--	--	--		
	12/05/14	--	28.73	0.00	--	--	--		
	12/09/14	--	28.72	0.00	--	--	--		
	12/18/14	--	28.64	0.00	--	--	--		
	12/26/14	--	28.64	0.00	--	--	--		
<b>Sub Total MW-6:</b>						<b>0.00</b>	<b>0.00</b>		
MW-7	03/31/10	27.13	27.58	0.45	0.75	0.50	0.25		
	4/8/2010	27.21	27.53	0.32	1.00	0.75	0.25		
	04/15/10	27.28	27.62	0.34	1.25	1.00	0.25		
	04/20/10	27.29	27.72	0.43	1.15	1.00	0.15		
	05/03/10	27.39	27.97	0.58	0.75	0.50	0.25		
	05/12/10	27.33	27.90	0.57	1.10	1.00	0.10		
	05/20/10	27.25	27.71	0.46	1.50	1.00	0.50		
	05/25/10	27.31	27.83	0.52	1.25	1.00	0.25		
	06/03/10	27.31	27.72	0.41	1.00	0.75	0.25		
	06/08/10	27.22	28.31	1.09	1.00	0.75	0.25		
	06/15/10	27.18	28.08	0.90	1.00	0.75	0.25		
	06/22/10	27.28	28.53	1.25	1.00	0.75	0.25		
	06/30/10	27.28	28.41	1.13	1.00	0.75	0.25		
	07/07/10	27.19	28.31	1.12	2.00	1.50	0.50		
	07/15/10	27.17	28.15	0.98	1.50	1.25	0.25		
	07/21/10	27.03	28.03	1.00	1.00	0.75	0.25		
	07/28/10	27.03	27.97	0.94	1.25	1.00	0.25		
	08/09/10	26.84	28.00	1.16	1.50	1.00	0.50		
	08/16/10	Attached to High Vacuum Dual Phase Extraction System							
	08/23/10	Attached to High Vacuum Dual Phase Extraction System							
	08/16/10	Attached to High Vacuum Dual Phase Extraction System							
	09/06/10	Attached to High Vacuum Dual Phase Extraction System							
	09/16/10	Attached to High Vacuum Dual Phase Extraction System							
	09/25/10	Attached to High Vacuum Dual Phase Extraction System							
	10/02/10	Attached to High Vacuum Dual Phase Extraction System							
	10/07/10	Attached to High Vacuum Dual Phase Extraction System							
	10/16/10	Attached to High Vacuum Dual Phase Extraction System							
	10/23/10	27.71	28.31	0.60	0.50	0.25	0.25		
	10/30/10	27.78	28.18	0.40	0.50	0.25	0.25		
	11/06/10	27.82	28.38	0.56	0.50	0.50	0.00		
	11/26/10	27.97	28.31	0.34	1.00	1.00	0.00		
	12/04/10	28.08	28.47	0.39	1.00	1.00	0.00		
	12/08/10	28.02	28.33	0.31	1.00	1.00	0.00		
	12/20/10	28.14	28.41	0.27	1.00	0.00	1.00		
	01/08/11	27.25	27.26	0.01	--	--	--		
	01/26/11	27.12	27.15	0.03	0.50	0.50	Sheen		
	02/05/11	27.18	27.19	0.01	0.50	0.50	Sheen		
	02/12/11	Attached to High Vacuum Dual Phase Extraction System							
	03/19/11	--	18.17	--	--	--	--		
	04/02/11	Attached to High Vacuum Dual Phase Extraction System							
	09/17/11	27.61	28.18	0.57	0.00	0.00	0.00		
	09/24/11	27.49	27.94	0.45	1.00	1.00	Sheen		
11/14/11	27.95	28.07	0.12	1.00	1.00	Sheen			
12/09/11	28.08	28.21	0.13	1.25	1.00	0.25			
01/24/12	28.24	28.62	0.38	1.00	1.00	Sheen			
02/11/12	29.19	29.48	0.29	1.05	1.00	0.05			
03/24/12	28.67	28.78	0.11	1.05	1.00	0.05			
04/14/12	28.65	28.70	0.05	1.04	1.00	0.04			
05/18/12	--	28.61	Sheen	--	--	--			
06/23/12	28.63	28.65	0.02	1.10	1.00	0.10			
07/28/12	28.67	28.72	0.05	2.10	2.09	0.01	3		
08/25/12	28.76	28.80	0.04	2.10	2.09	0.01	3		
09/29/12	--	28.35	0.00	--	--	--			
10/13/12	--	28.12	0.00	0.00	0.00	0.00			
10/27/12	--	28.35	0.00	0.00	0.00	0.00			
12/01/12	Not Measured			--	--	--			
01/05/13	Not Measured			--	--	--			
02/23/13	29.21	29.30	0.09	0.00	--	--			
04/20/13	29.06	29.09	0.03	--	--	--			
05/18/13	29.05	29.10	0.05	--	--	--			
06/22/13	28.95	28.99	0.04	--	--	--			

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-7	07/20/13	28.95	29.00	0.05	--	--	--	
	08/17/13	29.18	29.26	0.08	--	--	--	
	09/14/13	29.27	29.38	0.11	--	--	--	
	10/19/13	29.54	29.68	0.14	--	--	--	
	11/16/13	29.45	29.53	0.08	--	--	--	
	12/14/13	29.27	29.30	0.03	--	--	--	
	01/11/14	29.46	29.53	0.07	--	--	--	
	02/08/14	No Access		--	--	--	--	
	07/19/14	30.02	30.29	0.27	--	--	--	
<b>Sub Total MW-7:</b>						<b>33.18</b>	<b>7.01</b>	
MW-8	07/02/13	--	26.16	0.00	--	--	--	
	07/09/13	--	26.20	0.00	--	--	--	
	07/22/13	--	26.47	0.00	--	--	--	
	07/30/13	--	26.55	0.00	--	--	--	
	08/07/13	--	26.59	0.00	--	--	--	
	08/15/13	--	26.82	0.00	--	--	--	
	08/24/13	--	26.91	0.00	--	--	--	
	09/12/13	--	27.01	0.00	--	--	--	
	10/02/13	--	26.64	0.00	--	--	--	
	01/07/14	--	26.61	0.00	--	--	--	
	01/11/14	--	26.93	0.00	--	--	--	
	02/08/14	--	27.37	0.00	--	--	--	
	03/15/14	--	27.00	0.00	--	--	--	
	04/12/14	--	27.25	0.00	--	--	--	
	05/17/14	--	27.50	0.00	--	--	--	
	06/21/14	--	27.23	0.00	--	--	--	
	07/19/14	--	27.45	0.00	--	--	--	
	11/06/14	--	28.28	0.00	--	--	--	
	11/13/14	--	28.03	0.00	--	--	--	
	11/24/14	--	28.37	0.00	--	--	--	
12/05/14	--	28.18	0.00	--	--	--		
12/09/14	--	28.16	0.00	--	--	--		
12/18/14	--	28.15	0.00	--	--	--		
12/26/14	--	28.10	0.00	--	--	--		
<b>Sub Total MW-8:</b>						<b>0.00</b>	<b>0.00</b>	
MW-9	07/20/13	26.30	26.31	0.01	--	--	--	
	08/17/13	--	26.54	0.00	--	--	--	
	09/12/13	--	26.64	0.00	--	--	--	
	09/14/13	--	26.60	0.00	--	--	--	
	10/02/13	--	26.62	0.00	--	--	--	
	03/27/14	--	26.91	0.00	--	--	--	
	06/21/14	--	27.18	0.00	--	--	--	
	07/19/14	--	27.36	0.00	--	--	--	
<b>Sub Total MW-9:</b>						<b>0.00</b>	<b>0.00</b>	
MW-10	02/23/13	20.71	20.72	0.01	--	--	--	
	04/20/13	--	20.68	0.00	--	--	--	
	05/18/13	20.86	20.89	0.03	--	--	--	
	06/22/13	20.95	21.00	0.05	--	--	--	
	07/20/13	--	21.08	0.00	--	--	--	
	08/17/13	21.25	21.28	0.03	--	--	--	
	09/14/13	--	21.45	0.00	--	--	--	
	10/19/13	--	21.48	0.00	--	--	--	
	11/16/13	--	21.58	0.00	--	--	--	
	12/14/13	--	21.66	0.00	--	--	--	
	01/11/14	--	21.66	0.00	--	--	--	
	02/08/14	--	21.76	0.00	--	--	--	
	03/15/14	--	21.75	0.00	--	--	--	
	04/12/14	--	21.83	0.00	--	--	--	
	05/17/14	--	21.94	0.00	--	--	--	
06/21/14	--	22.00	0.00	--	--	--		
07/19/14	--	22.17	0.00	--	--	--		
<b>Sub Total MW-10:</b>						<b>0.00</b>	<b>0.00</b>	
MW-11	06/21/14	--	21.42	0.00	--	--	--	
	07/19/14	--	21.59	0.00	--	--	--	
<b>Sub Total MW-11:</b>						<b>0.00</b>	<b>0.00</b>	

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-14	09/16/10	--	28.26	Trace	3.00	3.00	Trace	
	09/25/10	28.45	28.50	0.05	2.00	1.75	0.25	
	10/02/10	28.52	28.58	0.06	1.00	1.00	Trace	
	10/07/10	28.50	28.54	0.04	1.00	1.00	Trace	
	10/16/10	28.72	28.76	0.04	1.00	1.00	Trace	
	10/23/10	28.64	28.65	0.01	1.00	1.00	0.00	
	10/30/10	28.66	28.69	0.03	1.00	1.00	0.00	
	11/06/10	28.78	28.86	0.08	0.50	0.50	0.00	
	12/04/10	29.01	29.37	0.36	1.00	1.00	0.00	
	12/08/10	29.06	29.17	0.11	1.00	1.00	0.00	
	01/08/11	28.21	28.22	0.01	--	--	--	
	02/05/11	--	28.17	--	--	--	--	
	02/12/11	28.60	28.71	0.11	1.00	1.00	Sheen	
	02/19/11	28.62	28.67	0.05	1.00	1.00	Sheen	
	02/23/11	29.07	29.18	0.11	1.00	1.00	Sheen	
	03/05/11	29.15	29.18	0.03	1.00	1.00	Sheen	
	03/19/11	29.37	29.59	0.22	1.00	1.00	Sheen	
	03/26/11	29.31	29.39	0.08	1.00	1.00	Sheen	
	04/02/11	29.44	29.59	0.15	1.00	1.00	Sheen	
	04/09/11	29.42	29.61	0.19	1.00	1.00	Sheen	
	04/16/11	29.46	29.56	0.10	1.00	1.00	Sheen	
	04/23/11	29.68	29.93	0.25	0.50	0.50	Sheen	
	04/30/11	29.70	30.13	0.43	1.00	1.00	Sheen	
	05/07/11	29.47	29.85	0.38	0.50	0.50	Sheen	
	05/14/11	29.62	30.13	0.51	--	--	--	
	05/21/11	29.63	30.14	0.51	1.00	1.00	Sheen	
	05/26/11	29.65	30.11	0.46	1.50	1.50	Sheen	
	06/04/11	29.67	30.08	0.41	1.00	1.00	Sheen	
	06/11/11	29.13	29.37	0.24	1.00	1.00	Sheen	
	06/18/11	29.22	29.25	0.03	1.00	1.00	Sheen	
	06/25/11	29.29	29.32	0.03	1.00	1.00	Sheen	
	01/24/12	--	29.43	0.00	--	--	--	
	02/11/12	--	30.37	0.00	--	--	--	
	03/24/12	29.77	30.13	0.36	1.10	1.00	0.10	
	04/14/12	29.70	30.12	0.42	1.40	1.00	0.40	
	05/18/12	29.70	30.46	0.76	1.50	1.00	0.50	
	06/23/12	29.69	29.72	0.03	1.10	1.00	0.10	
	07/28/12	Not Measured			--	--	--	
	08/25/12	Not Measured			--	--	--	
	09/29/12	Not Measured			--	--	--	
	10/13/12	29.14	29.26	0.12	0.00	0.00	0.00	
	10/27/12	29.31	29.49	0.18	0.00	0.00	0.00	
	12/01/12	Not Measured			--	--	--	
	01/05/13	Not Measured			--	--	--	
	02/23/13	30.03	31.06	1.03	0.00	0.00	0.00	
04/20/13	30.04	30.66	0.62	12.00	11.47	0.53	10	
05/18/13	30.03	30.73	0.70	2.11	2.10	0.01	2	
06/22/13	29.85	30.11	0.26	0.00	0.00	0.00	0	
07/20/13	29.93	30.24	0.31	10.00	9.89	0.11	10	
08/17/13	30.08	30.51	0.43	--	--	--		
09/14/13	30.09	30.74	0.65	9.00	8.36	0.64	10	
10/19/13	30.46	31.33	0.87	8.00	7.68	0.32	5	
11/16/13	30.17	30.69	0.52	5.00	4.68	0.32	5	
12/14/13	29.74	29.78	0.04	--	--	--		
01/11/14	30.00	30.13	0.13	--	--	--		
02/08/14	30.23	30.27	0.04	5.00	4.89	0.11	10	
03/15/14	30.58	30.97	0.39	10.00	9.89	0.11	10	
04/12/14	30.38	30.90	0.52	8.00	7.79	0.21	10	
05/17/14	30.37	30.88	0.51	6.00	5.89	0.11	10	
06/21/14	30.55	31.30	0.75	--	--	--		
07/19/14	30.61	31.48	0.87	--	--	--		
<b>Sub Total MW-14:</b>						<b>106.41</b>	<b>3.80</b>	

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-15	09/16/10	25.69	27.02	1.33	10.00	7.50	2.50	
	09/25/10	25.81	27.21	1.40	4.00	2.00	2.00	
	10/02/10	25.85	27.30	1.45	4.00	2.00	2.00	
	10/07/10	25.90	27.36	1.46	8.00	5.00	3.00	
	10/16/10	25.93	27.42	1.49	4.00	3.00	1.00	
	10/23/10	25.95	27.47	1.52	5.00	0.50	4.50	
	10/30/10	25.73	27.31	1.58	5.00	0.50	4.50	
	11/06/10	26.03	27.58	1.55	4.00	2.00	2.00	
	12/04/10	26.11	27.65	1.54	5.00	2.50	2.50	
	12/08/10	26.13	27.71	1.58	5.00	2.50	2.50	
	01/08/11	25.32	26.11	0.79	1.50	1.25	0.25	
	02/05/11	25.23	25.81	0.58	2.00	1.90	0.10	
	02/12/11	25.38	26.27	0.89	1.25	1.00	0.25	
	02/19/11	25.35	26.25	0.90	1.50	1.00	0.50	
	02/23/11	25.47	26.50	1.03	1.50	1.00	0.50	
	03/05/11	25.48	26.55	1.07	3.00	2.75	0.25	
	03/19/11	25.51	26.60	1.09	2.00	1.50	0.50	
	03/26/11	25.55	26.49	0.94	2.75	2.00	0.75	
	04/02/11	25.51	26.38	0.87	2.00	1.50	0.50	
	04/09/11	25.50	26.43	0.93	3.00	2.00	1.00	
	04/16/11	25.52	26.41	0.89	3.75	2.00	1.75	
	04/23/11	25.76	26.75	0.99	2.25	1.75	0.5	
	04/30/11	25.81	26.68	0.87	2.25	1.50	0.75	
	05/07/11	25.63	26.61	0.98	3.25	2.75	0.50	
	05/14/11	25.80	26.70	0.90	2.25	1.50	0.75	
	05/21/11	25.78	26.86	1.08	2.25	1.50	0.75	
	05/26/11	25.80	26.94	1.14	2.50	1.00	1.00	
	06/04/11	25.85	27.01	1.16	3.00	2.00	1.00	
	06/11/11	25.34	26.59	1.25	3.50	2.50	1.00	
	06/18/11	25.54	26.68	1.14	2.50	1.50	1.00	
	06/25/11	25.88	27.06	1.18	2.50	1.50	1.00	
	07/09/11	25.88	27.06	1.18	2.00	1.00	1.00	
	07/16/11	25.95	27.18	1.23	2.00	1.00	1.00	
	07/23/11	25.96	27.20	1.24	2.00	1.00	1.00	
	08/06/11	26.01	27.24	1.23	2.25	1.00	1.25	
	08/13/11	25.96	27.23	1.27	2.50	1.50	1.00	
	08/20/11	25.95	27.24	1.29	2.50	1.00	1.50	
	08/27/11	26.02	27.29	1.27	2.00	1.00	1.00	
	09/24/11	25.99	27.22	1.23	1.75	0.75	1.00	
	10/08/11	25.99	27.28	1.29	2.00	0.75	1.25	
	11/14/11	26.15	27.57	1.42	2.00	0.75	1.25	
	12/10/11	26.20	27.62	1.42	2.50	1.00	1.50	
	01/14/12	26.31	27.83	1.52	2.25	0.75	1.50	
	02/11/12	27.09	28.52	1.43	2.25	1.00	1.25	
	03/24/12	26.43	27.98	1.55	2.50	1.00	1.50	
	04/14/12	26.38	27.87	1.49	3.00	1.50	1.50	
	05/18/12	26.37	27.92	1.55	3.00	1.50	1.50	
	06/23/12	26.31	27.93	1.62	2.25	1.00	1.25	
	07/28/12	26.49	28.20	1.71	38.00	34.50	3.50	25
	08/25/12	26.59	28.15	1.56	45.00	40.76	4.24	25
	09/29/12	26.54	28.30	1.76	83.00	75.79	7.21	60
	10/13/12	26.62	28.19	1.57	20.00	17.88	2.12	15
	10/27/12	26.53	28.06	1.53	28.00	25.56	2.44	50
	12/01/12	26.60	28.34	1.74	58.00	52.59	5.41	50
	01/05/13	26.69	28.58	1.89	47.00	42.02	4.98	90
	02/23/13	26.75	28.55	1.80	10.00	8.94	1.06	17
	04/20/13	26.71	28.40	1.69	29.00	26.46	2.54	30
	05/18/13	26.82	28.60	1.78	37.00	33.08	3.92	30
	06/22/13	26.81	28.62	1.81	16.00	14.30	1.70	30
	07/20/13	26.90	28.72	1.82	33.00	30.03	2.97	30
	08/17/13	27.09	28.94	1.85	35.00	32.03	2.97	30
	09/14/13	27.23	29.07	1.84	30.00	26.82	3.18	30
	10/19/13	27.31	29.22	1.91	32.00	29.35	2.65	20
	11/16/13	27.45	29.35	1.90	30.00	27.35	2.65	20
	12/14/13	27.60	29.48	1.88	21.00	18.77	2.23	20
	01/11/14	27.61	29.48	1.87	30.00	27.88	2.12	40
	02/08/14	27.74	29.66	1.92	40.00	36.82	3.18	60
	03/15/14	27.78	29.71	1.93	45.00	41.82	3.18	60

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-15	04/12/14	27.79	29.81	2.02	30.00	27.35	2.65	40
	05/17/14	27.87	30.81	2.94	25.00	22.35	2.65	45
	06/21/14	27.93	29.82	1.89	31.00	27.71	3.29	30
	07/19/14	28.13	30.08	1.95	20.00	17.88	2.12	30
	11/01/14	28.52	30.31	1.79	2.10	1.25	0.85	
	11/15/14	28.66	30.46	1.80	1.10	0.20	0.90	--
	12/06/14	28.75	30.60	1.85	1.81	0.20	1.61	--
	12/20/14	28.79	30.56	1.77	1.41	0.20	1.21	--
<b>Sub Total MW-15:</b>						<b>820.31</b>	<b>141.86</b>	
MW-16	09/16/10	22.04	24.06	2.02	5.00	4.00	1.00	
	09/25/10	22.11	24.13	2.02	3.00	2.00	1.00	
	10/02/10	22.14	24.19	2.05	3.00	2.00	1.00	
	10/07/10	22.22	24.24	2.02	3.00	2.00	1.00	
	10/16/10	22.23	24.28	2.05	4.00	3.00	1.00	
	10/23/10	22.27	24.30	2.03	2.00	0.50	1.50	
	10/30/10	22.18	24.27	2.09	2.50	0.50	2.00	
	11/06/10	22.31	24.37	2.06	3.00	1.00	2.00	
	12/04/10	22.38	24.45	2.07	2.50	1.00	1.50	
	12/08/10	22.41	24.45	2.04	2.00	1.00	1.00	
	01/08/11	21.44	22.80	1.36	--	--	--	
	02/05/11	21.48	22.91	1.43	2.00	1.25	0.75	
	02/12/11	21.54	23.18	1.64	2.00	1.50	0.75	
	02/19/11	21.51	23.03	1.52	2.50	1.50	1.00	
	02/23/11	21.58	23.07	1.49	2.50	1.50	1.00	
	03/05/11	21.55	23.08	1.53	3.00	2.00	1.00	
	03/19/11	21.57	23.10	1.53	2.00	1.50	0.50	
	03/26/11	21.61	22.82	1.21	2.50	2.00	0.50	
	04/02/11	21.57	22.72	1.15	2.75	2.25	0.50	
	04/09/11	21.62	22.93	1.31	2.75	2.00	0.75	
	04/16/11	21.60	22.82	1.22	2.50	2.00	0.50	
	04/23/11	21.81	23.07	1.26	2.00	1.50	0.5	
	04/30/11	21.85	23.13	1.28	3.00	2.50	0.50	
	05/07/11	21.57	22.66	1.09	3.25	2.50	0.75	
	05/14/11	21.72	23.13	1.41	2.25	1.50	0.75	
	05/21/11	21.85	23.10	1.25	2.75	2.00	0.75	
	05/26/11	21.93	23.07	1.14	2.50	1.50	1.00	
	06/04/11	21.93	23.20	1.27	3.00	2.00	1.00	
	06/11/11	21.46	23.01	1.55	3.00	2.00	1.00	
	06/18/11	21.73	23.10	1.37	2.00	1.25	0.75	
	06/25/11	21.98	23.36	1.38	2.50	1.50	1.00	
	07/09/11	22.03	23.40	1.37	1.50	1.00	0.50	
	07/16/11	22.17	23.41	1.24	2.00	1.25	0.75	
	07/23/11	22.18	23.41	1.23	2.50	1.50	1.00	
	08/06/11	22.32	23.65	1.33	2.50	1.50	1.00	
	08/13/11	22.29	23.54	1.25	2.25	1.25	1.00	
	08/20/11	22.29	23.68	1.39	2.00	1.00	1.00	
	09/24/11	22.34	23.88	1.54	1.25	0.50	0.75	
	10/08/11	22.42	23.97	1.55	1.50	0.50	1.00	
	11/14/11	22.56	24.18	1.62	2.50	1.00	1.50	
	12/10/11	22.48	24.26	1.78	2.50	1.00	1.50	
	01/14/12	22.62	24.35	1.73	2.50	1.00	1.50	
	02/11/12	23.39	24.93	1.54	2.50	1.00	1.50	
03/24/12	22.66	24.38	1.72	1.25	0.50	1.00		
04/14/12	22.60	24.28	1.68	3.00	1.50	1.50		
05/18/12	22.61	24.28	1.67	3.00	1.25	1.75		
06/23/12	22.67	24.43	1.76	3.50	1.50	2.00		
07/28/12	22.80	24.57	1.77	33.00	29.82	3.18	29	
08/25/12	23.88	24.66	0.78	40.00	36.82	3.18	29	
09/29/12	23.00	24.70	1.70	35.00	31.82	3.18	60	
10/13/12	23.01	24.73	1.72	15.00	13.41	1.59	10	
10/27/12	22.90	24.67	1.77	20.00	18.41	1.59	45	
12/01/12	22.94	24.73	1.79	23.00	20.56	2.44	60	
01/05/13	22.90	24.85	1.95	58.00	52.38	5.62	40	
02/23/13	22.86	24.31	1.45	40.00	36.29	3.71	63	
04/20/13	22.85	24.70	1.85	52.00	47.23	4.77	60	
05/18/13	23.00	24.95	1.95	34.00	30.40	3.60	22	
06/22/13	23.05	25.04	1.99	50.00	45.23	4.77	50	
07/20/13	23.13	25.11	1.98	33.00	29.50	3.50	60	
08/17/13	23.31	25.32	2.01	55.00	49.17	5.83	60	
09/14/13	23.46	25.49	2.03	30.00	26.82	3.18	60	

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-16	10/19/13	23.60	25.59	1.99	45.00	40.23	4.77	40
	11/16/13	23.69	25.77	2.08	40.00	35.76	4.24	45
	12/14/13	23.78	25.80	2.02	46.00	41.87	4.13	60
	01/11/14	23.80	25.81	2.01	35.00	32.03	2.97	40
	02/08/14	23.88	25.91	2.03	75.00	72.35	2.65	75
	03/15/14	23.91	25.92	2.01	60.00	55.76	4.24	60
	04/12/14	23.90	25.92	2.02	37.00	33.08	3.92	60
	05/17/14	24.03	26.06	2.03	60.00	54.70	5.30	55
	06/21/14	24.13	26.27	2.14	65.00	58.96	6.04	60
	07/19/14	24.26	26.32	2.06	33.00	29.50	3.50	45
	11/01/14	24.77	26.52	1.75	2.51	1.25	1.26	--
	11/15/14	24.90	26.72	1.82	1.26	0.20	1.06	--
12/06/14	25.02	26.65	1.63	1.36	0.10	1.26	--	
12/20/14	25.00	26.62	1.62	1.26	0.30	0.96	--	
<b>Sub Total MW-16:</b>						<b>993.95</b>	<b>143.94</b>	
MW-17	08/13/11	19.37	19.90	0.53	1.00	1.00	Sheen	
	10/08/11	20.53	21.39	0.86	1.00	1.00	Sheen	
	11/14/11	20.52	22.17	1.65	1.50	1.00	0.50	
	12/09/11	20.47	22.20	1.73	1.10	1.00	0.10	
	01/14/12	20.48	22.37	1.89	1.50	1.00	0.50	
	02/11/12	21.37	23.03	1.66	1.75	1.00	0.75	
	03/24/12	20.47	22.33	1.86	1.25	0.75	0.50	
	04/14/12	20.42	22.20	1.78	1.50	0.50	1.00	
	05/18/12	20.39	22.19	1.80	1.75	1.50	0.25	
	06/23/12	20.50	22.39	1.89	1.75	1.50	0.25	
	07/28/12	20.62	22.50	1.88	23.00	21.62	1.38	30
	08/25/12	20.71	22.62	1.91	25.00	23.41	1.59	30
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	20.90	22.76	1.86	13.00	11.62	1.38	10
	10/27/12	20.87	22.71	1.84	10.00	9.36	0.64	20
	12/01/12	20.84	22.73	1.89	20.00	19.58	0.42	30
	01/05/13	20.79	22.65	1.86	0.00	0.00	0.00	
	02/23/13	20.71	22.41	1.70	8.00	7.68	0.32	15
	04/20/13	20.69	22.45	1.76	15.00	13.94	1.06	15
	05/18/13	20.86	22.76	1.90	12.00	11.26	0.74	10
	06/22/13	20.95	22.88	1.93	11.00	10.68	0.32	15
	07/20/13	21.03	22.94	1.91	7.00	6.26	0.74	10
	08/17/13	21.23	23.12	1.89	10.00	9.68	0.32	7
	09/14/13	21.28	23.01	1.73	14.00	13.58	0.42	10
	10/19/13	21.55	23.35	1.80	6.00	5.36	0.64	5
	11/16/13	21.58	23.44	1.86	10.00	9.47	0.53	5
	12/14/13	21.62	23.55	1.93	10.00	9.79	0.21	10
	01/11/14	21.64	23.55	1.91	8.00	7.47	0.53	10
	02/08/14	21.71	--	--	4.00	4.00	0.00	10
	03/15/14	21.70	23.60	1.90	15.00	14.47	0.53	15
04/12/14	21.75	23.66	1.91	11.00	10.36	0.64	15	
05/17/14	21.88	23.75	1.87	10.00	8.94	1.06	13	
06/21/14	22.00	23.84	1.84	11.00	10.47	0.53	10	
07/19/14	22.14	24.03	1.89	13.00	11.94	1.06	10	
11/01/14	22.81	23.90	1.09	1.76	0.75	1.01	--	
11/15/14	23.16	23.27	0.11	0.26	0.00	0.26	--	
12/06/14	23.15	23.29	0.14	0.13	0.00	0.13	--	
12/20/14	23.03	23.20	0.17	0.10	0.00	0.10	--	
<b>Sub Total MW-17:</b>						<b>261.95</b>	<b>20.40</b>	
MW-18	07/15/13	--	20.55	0.00	--	--	--	
	09/14/13	--	20.81	0.00	--	--	--	
	03/27/14	--	21.13	0.00	--	--	--	
	06/21/14	--	21.43	0.00	--	--	--	
	07/19/14	--	21.56	0.00	--	--	--	
<b>Sub Total MW-18:</b>						<b>0.00</b>	<b>0.00</b>	
MW-19	08/13/11	25.19	25.87	0.68	1.00	1.00	Sheen	
	09/24/11	25.38	26.13	0.75	1.00	1.00	Sheen	
	10/08/11	25.17	25.97	0.80	1.00	1.00	Sheen	
	11/14/11	25.53	26.43	0.90	1.00	1.00	Sheen	
	12/08/11	25.55	25.58	0.03	11.00	11.00	Sheen	
	01/14/12	25.62	26.75	1.13	1.25	1.00	0.25	
	02/11/12	26.33	27.35	1.02	1.25	1.00	0.25	
	03/24/12	25.71	26.87	1.16	1.25	0.75	0.50	
	04/14/12	25.68	26.76	1.08	1.00	0.75	0.25	
05/18/12	25.65	26.62	0.97	0.50	0.25	0.25		

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
MW-19	06/23/12	25.70	26.73	1.03	1.15	1.00	0.15		
	07/28/12	25.78	27.18	1.40	15.00	13.94	1.06	15	
	08/25/12	25.82	27.25	1.43	15.00	13.94	1.06	15	
	09/29/12	Not Measured		--	--	--	--		
	10/13/12	25.43	29.09	3.66	25.00	22.35	2.65	30	
	10/27/12	25.28	29.05	3.77	25.00	22.88	2.12	65	
	12/01/12	Not Measured		--	--	--	--		
	01/05/13	26.00	27.53	1.53	0.00	0.00	0.00		
	02/23/13	26.12	27.00	0.88	7.00	6.79	0.21	7	
	04/20/13	26.11	26.75	0.64	10.00	9.47	0.53	10	
	05/18/13	Not Measured - Connected to HVDPE							
	06/22/13	Not Measured - Connected to HVDPE							
	07/02/13	26.69	27.07	0.38	--	--	--	--	
	07/09/13	26.74	27.08	0.34	--	--	--	--	
	07/20/13	Not Measured - Connected to HVDPE							
	08/15/13	--	27.26	0.00	--	--	--	--	
	08/17/13	Not Measured - Connected to HVDPE							
	08/24/13	--	27.41	0.00	--	--	--	--	
	09/12/13	27.20	27.23	0.03	Connected to HVDPE				
	10/02/13	--	26.84	0.00	--	--	--	--	
	10/19/13	--	26.85	0.00	--	--	--	--	
	11/16/13	--	--	--	Connected to HVDPE - Extracting				
	11/26/13	--	27.30	0.00	Connected to HVDPE - Extracting				
	12/14/13	--	--	--	Connected to HVDPE - Extracting				
	01/07/14	--	27.49	0.00	Connected to HVDPE - Not Extracting				
	01/11/14	--	27.21	0.00	Connected to HVDPE - Not Extracting				
	01/16/14	--	27.50	0.00	Connected to HVDPE - Not Extracting				
	01/23/14	--	27.48	0.00	Connected to HVDPE - Not Extracting				
	01/27/14	--	27.52	0.00	Connected to HVDPE - Not Extracting				
	02/06/14	--	27.50	0.00	Connected to HVDPE - Not Extracting				
	02/08/14	--	27.51	0.00	Connected to HVDPE - Not Extracting				
	02/24/14	--	27.35	0.00	Connected to HVDPE - Not Extracting				
	02/27/14	--	27.69	0.00	Connected to HVDPE - Not Extracting				
	03/15/14	--	27.27	0.00	Connected to HVDPE - Not Extracting				
	03/27/14	--	27.25	0.00	Connected to HVDPE - Not Extracting				
	04/12/14	--	--	--	Connected to HVDPE - Not Extracting				
	05/01/14	--	27.60	0.00	Connected to HVDPE - Not Extracting				
	05/17/14	--	27.88	0.00	Connected to HVDPE - Not Extracting				
	05/22/14	--	27.62	0.00	Connected to HVDPE - Not Extracting				
	06/12/14	--	27.51	0.00	Connected to HVDPE - Not Extracting				
	06/19/14	--	27.49	0.00	Connected to HVDPE - Not Extracting				
	06/21/14	--	--	--	Connected to HVDPE - Not Extracting				
	06/26/14	--	27.54	0.00	Connected to HVDPE - Not Extracting				
	07/04/14	--	27.56	0.00	Connected to HVDPE - Not Extracting				
	07/10/14	--	27.55	0.00	Connected to HVDPE - Not Extracting				
07/17/14	--	27.54	0.00	Connected to HVDPE - Not Extracting					
07/19/14	--	--	--	Connected to HVDPE - Not Extracting					
07/24/14	--	27.43	0.00	Connected to HVDPE - Not Extracting					
07/31/14	--	27.41	0.00	Connected to HVDPE - Not Extracting					
08/08/14	--	27.59	0.00	Connected to HVDPE - Not Extracting					
09/04/14	--	27.90	0.00	Connected to HVDPE - Not Extracting					
09/19/14	--	27.89	0.00	Connected to HVDPE - Not Extracting					
09/24/14	--	27.93	0.00	Connected to HVDPE - Not Extracting					
10/02/14	--	27.98	0.00	Connected to HVDPE - Not Extracting					
10/10/14	--	28.10	0.00	Connected to HVDPE - Not Extracting					
10/20/14	--	28.05	0.00	Connected to HVDPE - Not Extracting					
11/06/14	--	28.65	0.00	Connected to HVDPE - Not Extracting					
11/21/14	--	28.75	0.00	Connected to HVDPE - Not Extracting					
11/24/14	--	28.73	0.00	Connected to HVDPE - Not Extracting					
12/05/14	--	28.46	0.00	Connected to HVDPE - Not Extracting					
12/09/14	--	28.44	0.00	Connected to HVDPE - Not Extracting					
12/18/14	--	28.45	0.00	Connected to HVDPE - Not Extracting					
12/26/14	28.35	28.36	0.01	Connected to HVDPE - Not Extracting					
12/30/14	--	28.75	0.00	Connected to HVDPE - Not Extracting					
<b>Sub Total MW-19:</b>						<b>109.12</b>	<b>9.28</b>		

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
MW-20	07/28/12	--	26.15	0.00	--	--	--	
	08/25/12	--	26.29	0.00	--	--	--	
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	--	26.34	0.00	--	--	--	
	10/27/12	--	25.95	0.00	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	--	26.41	0.00	--	--	--	
	04/20/13	--	26.33	0.00	--	--	--	
	05/18/13	Not Measured		--	--	--	--	
	06/22/13	--	26.61	0.00	--	--	--	
	07/20/13	26.82	26.83	0.01	--	--	--	
	08/15/13	--	27.10	0.00	--	--	--	
	08/17/13	Not Measured		--	--	--	--	
	08/24/13	--	27.20	0.00	--	--	--	
	09/12/13	--	27.36	0.00	--	--	--	
	10/02/13	--	27.07	0.00	--	--	--	
	10/19/13	--	27.07	0.00	--	--	--	
	11/16/13	--	27.48	0.00	--	--	--	
	12/14/13	--	27.78	0.00	--	--	--	
	01/11/14	--	27.45	0.00	--	--	--	
	02/08/14	--	27.88	0.00	--	--	--	
	03/15/14	--	27.53	0.00	--	--	--	
	04/12/14	--	27.72	0.00	--	--	--	
	05/17/14	--	27.98	0.00	--	--	--	
	06/21/14	--	27.71	0.00	--	--	--	
07/19/14	--	27.96	0.00	--	--	--		
10/20/14	--	28.05	0.00	--	--	--		
11/06/14	--	28.75	0.00	--	--	--		
11/13/14	--	28.49	0.00	--	--	--		
11/24/14	--	28.82	0.00	--	--	--		
12/05/14	--	28.73	0.00	--	--	--		
12/09/14	--	28.77	0.00	--	--	--		
12/18/14	--	28.73	0.00	--	--	--		
12/26/14	--	28.63	0.00	--	--	--		
<b>Sub Total MW-20:</b>						<b>0.00</b>	<b>0.00</b>	
MW-21	07/28/12	--	20.74	--	--	--	--	
	08/25/12	--	20.87	--	--	--	--	
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	Not Measured		--	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	--	20.82	0.00	--	--	--	
	04/20/13	--	20.88	0.00	--	--	--	
	05/18/13	--	21.08	0.00	--	--	--	
	06/22/13	--	21.18	0.00	--	--	--	
	07/20/13	--	21.30	0.00	--	--	--	
	08/17/13	--	21.52	0.00	--	--	--	
	09/14/13	--	21.69	0.00	--	--	--	
	10/19/13	--	21.77	0.00	--	--	--	
	11/16/13	--	21.83	0.00	--	--	--	
	12/14/13	--	21.92	0.00	--	--	--	
	01/11/14	--	21.90	0.00	--	--	--	
	02/08/14	--	22.00	0.00	--	--	--	
	03/15/14	--	21.97	0.00	--	--	--	
04/12/14	--	22.07	0.00	--	--	--		
05/17/14	--	22.17	0.00	--	--	--		
06/21/14	--	22.24	0.00	--	--	--		
07/19/14	--	22.40	0.00	--	--	--		
<b>Sub Total MW-21:</b>						<b>0.00</b>	<b>0.00</b>	
MW-22	07/20/13	--	19.37	0.00	--	--	--	
	08/17/13	--	19.50	0.00	--	--	--	
	09/14/13	--	19.54	0.00	--	--	--	
	03/27/14	--	20.01	0.00	--	--	--	
	06/21/14	--	20.25	0.00	--	--	--	
	07/19/14	--	20.38	0.00	--	--	--	
<b>Sub Total MW-22:</b>						<b>0.00</b>	<b>0.00</b>	

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
MW-23	03/27/14	--	26.24	0.00	--	--	--		
	06/21/14	--	26.51	0.00	--	--	--		
	<b>Sub Total MW-23:</b>						<b>0.00</b>	<b>0.00</b>	
EZ-1	10/30/10	28.38	28.40	0.02	1.00	1.00	0.00		
	11/06/10	28.46	28.49	0.03	0.50	0.50	0.00		
	11/26/10	28.61	28.64	0.03	1.00	1.00	0.00		
	12/08/10	28.73	29.03	0.30	1.00	1.00	0.00		
	12/20/10	28.68	29.33	0.65	2.00	1.25	0.75		
	01/08/10	27.93	28.07	0.14	0.25	0.25	Sheen		
	01/26/11	27.86	27.97	0.11	0.50	0.50	Sheen		
	02/05/11	27.89	27.97	0.08	0.50	0.50	Sheen		
	02/12/11	28.19	28.35	0.16	1.00	1.00	Sheen		
	02/23/11	28.41	28.53	0.12	0.50	--	Sheen		
	03/05/11	28.58	28.78	0.20	1.00	1.00	Sheen		
	03/19/11	28.66	28.98	0.32	1.10	1.00	0.10		
	03/26/11	28.88	29.13	0.25	1.00	1.00	Sheen		
	04/02/11	28.93	29.18	0.25	1.50	1.50	Sheen		
	04/09/11	28.81	29.02	0.21	1.00	1.00	Sheen		
	04/16/11	28.97	29.34	0.37	1.00	1.00	Sheen		
	04/23/11	Vehicle Obstructing Well							
	04/30/11	28.29	29.81	1.52	2.25	2.00	0.25		
	05/07/11	29.05	29.53	0.48	1.75	1.50	0.25		
	05/14/11	29.20	29.65	0.45	1.25	1.00	0.25		
	05/21/11	29.31	29.53	0.22	1.25	1.00	0.25		
	05/26/11	--	--	0.25	1.25	1.00	0.25		
	06/04/11	29.27	29.73	0.46	2.25	2.00	0.25		
	06/11/11	29.24	29.48	0.24	2.25	2.00	0.25		
	06/18/11	28.97	29.04	0.07	1.00	1.00	Sheen		
	06/25/11	28.83	29.39	0.56	2.25	1.25	1.00		
	07/09/11	28.97	29.35	0.38	2.00	1.00	1.00		
	07/16/11	29.15	29.60	0.45	1.25	1.00	0.25		
	07/23/11	29.07	29.35	0.28	1.25	1.00	0.25		
	08/13/11	28.72	28.73	0.01	1.00	1.00	Sheen		
	11/14/11	28.93	28.94	0.01	1.00	1.00	Sheen		
	12/09/11	29.03	29.14	0.11	1.00	1.00	0.10		
	01/14/12	29.38	29.50	0.12	1.00	1.00	Sheen		
	02/11/12	28.80	29.50	0.70	1.10	1.00	0.10		
	03/24/12	29.57	30.43	0.86	4.25	2.00	2.25		
	04/14/12	29.66	29.98	0.32	3.00	2.50	0.50		
	05/18/12	29.78	30.34	0.56	0.50	0.25	0.25		
	06/23/12	29.64	30.61	0.97	2.50	1.00	1.50		
	07/28/12	29.68	30.50	0.82	18.00	16.41	1.59	25	
	08/25/12	29.80	30.50	0.70	25.00	23.94	1.06	25	
	09/29/12	29.43	29.49	0.06	--	--	--		
10/13/12	29.30	29.39	0.09	20.00	19.47	0.53	25		
10/27/12	29.06	29.20	0.14	5.00	4.79	0.21	10		
12/01/12	Not Measured			--	--	--			
01/05/13	Not Measured			--	--	--			
02/23/13	29.70	31.08	1.38	15.00	14.05	0.95	18		
04/20/13	29.60	31.06	1.46	17.00	15.73	1.27	20		
05/18/13	29.68	30.96	1.28	15.00	13.62	1.38	25		
06/22/13	29.49	30.47	0.98	5.00	4.79	0.21	15		
07/20/13	29.54	30.52	0.98	--	--	--			
08/17/13	29.67	30.85	1.18	14.00	13.05	0.95	10		
09/14/13	29.70	30.88	1.18	10.00	8.94	1.06	10		
10/19/13	29.92	31.48	1.56	7.00	6.79	0.21	10		
11/16/13	29.80	31.12	1.32	5.00	4.47	0.53	5		
12/14/13	29.35	29.95	0.60	8.00	7.79	0.21	5		
01/11/14	29.63	29.64	0.01	0.00	0.00	0.00	0		
02/08/14	No Access			--	--	--			
07/19/14	30.12	31.79	1.67	--	--	--			
<b>Sub Total EZ-1:</b>						<b>193.82</b>	<b>19.98</b>		
EZ-2	10/30/10	27.48	27.49	0.01	1.00	1.00	0.00		
	01/08/11	--	27.03	--	0.25	0.25	Sheen		
	02/12/11	Attached to High Vacuum Dual Phase Extraction System							
	01/14/12	--	28.23	0.00	--	--	--		
	02/11/12	--	28.83	0.00	--	--	Sheen		
	03/24/12	--	28.60	0.00	--	--	--		
	04/14/12	--	28.61	0.00	--	--	--		
05/18/12	28.59	29.30	0.71	2.25	2.00	0.25			

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**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
EZ-2	06/23/12	28.54	28.90	0.36	1.25	1.00	0.25		
	07/28/12	28.54	28.95	0.41	3.00	2.89	0.11	3	
	08/25/12	28.67	29.18	0.51	2.10	2.09	0.01	3	
	09/29/12	--	27.89	0.00	--	--	--		
	10/13/12	--	27.92	0.00	--	--	--		
	10/27/12	--	28.07	0.00	--	--	--		
	12/01/12	Not Measured		--	--	--	--		
	01/05/13	Not Measured		--	--	--	--		
	02/23/13	28.96	29.45	0.49	--	--	--		
	04/20/13	28.87	29.15	0.28	7.00	6.79	0.21	10	
	05/18/13	28.90	29.20	0.30	2.19	2.17	0.02	2	
	06/22/13	--	28.69	0.00	--	--	--	--	
	07/20/13	28.77	28.79	0.02	--	--	--	--	
	08/17/13	28.88	29.14	0.26	--	--	--	--	
	09/14/13	28.91	29.38	0.47	--	--	--	--	
	10/19/13	29.20	29.92	0.72	--	--	--	--	
	11/16/13	29.02	29.23	0.21	6.00	5.89	0.11	5	
	12/14/13	--	28.43	0.00	--	--	--	--	
	01/11/14	28.70	28.97	0.27	--	--	--	--	
02/08/14	No Access		--	--	--	--	--		
07/19/14	29.40	30.14	0.74	--	--	--	--		
<b>Sub Total EZ-2:</b>						<b>24.09</b>	<b>0.95</b>		
EZ-3	03/31/10	25.97	31.35	5.38	11.00	4.25	6.75		
	4/8/2010	26.08	31.15	5.07	8.50	1.75	6.75		
	04/15/10	26.25	29.81	3.56	7.50	1.75	5.75		
	04/20/10	26.57	29.71	3.14	6.25	2.25	4.00		
	05/03/10	26.43	30.91	4.48	9.00	2.75	6.25		
	05/12/10	26.67	29.72	3.05	8.60	3.00	5.60		
	05/20/10	26.68	29.12	2.44	5.50	1.50	4.00		
	05/25/10	26.94	28.54	1.60	5.25	1.25	4.00		
	06/03/10	26.75	28.90	2.15	5.50	2.50	3.00		
	06/08/10	26.88	28.50	1.62	4.50	2.25	2.25		
	06/15/10	27.81	28.58	0.77	5.00	2.75	2.25		
	06/22/10	27.00	28.17	1.17	5.00	3.75	1.25		
	06/30/10	26.88	28.61	1.73	4.00	1.25	2.75		
	07/07/10	26.53	29.35	2.82	8.00	2.00	6.00		
	07/15/10	26.67	28.65	1.98	6.00	3.50	2.50		
	07/21/10	26.48	28.40	1.92	7.00	1.50	5.50		
	07/28/10	26.36	29.18	2.82	7.00	3.00	4.00		
	08/09/10	26.43	28.28	1.85	4.00	1.50	2.50		
	08/16/10	Attached to High Vacuum Dual Phase Extraction System							
	08/23/10	Attached to High Vacuum Dual Phase Extraction System							
	08/30/10	Attached to High Vacuum Dual Phase Extraction System							
	09/06/10	Attached to High Vacuum Dual Phase Extraction System							
	09/16/10	Attached to High Vacuum Dual Phase Extraction System							
	09/25/10	Attached to High Vacuum Dual Phase Extraction System							
	10/02/10	Attached to High Vacuum Dual Phase Extraction System							
	10/07/10	Attached to High Vacuum Dual Phase Extraction System							
	10/16/10	Attached to High Vacuum Dual Phase Extraction System							
	10/23/10	27.44	27.89	0.45	1.00	0.25	0.75		
	10/30/10	27.48	27.95	0.47	1.00	0.25	0.75		
	11/06/10	27.49	28.24	0.75	2.00	0.50	1.50		
	11/26/10	27.63	28.24	0.61	4.00	3.00	1.00		
	12/04/10	27.53	29.14	1.61	4.00	2.00	2.00		
	12/08/10	27.61	29.06	1.45	4.00	2.00	2.00		
	12/20/10	27.17	30.60	3.43	6.00	2.00	4.00		
	01/08/11	26.61	28.41	1.80	3.50	1.25	2.25		
	01/26/11	26.64	27.71	1.07	3.00	2.00	1.00		
02/05/11	26.58	28.04	1.46	5.00	3.00	2.00			
02/12/11	Attached to High Vacuum Dual Phase Extraction System								
09/17/11	26.75	30.33	3.58	0.00	0.00	0.00			
09/24/11	26.50	30.29	3.79	15.00	7.50	7.50			
10/08/11	27.22	27.65	0.43	1.25	1.00	0.25			
11/14/11	27.63	27.77	0.14	1.00	1.00	Sheen			
12/09/11	27.76	27.97	0.21	1.25	1.00	0.25			
01/14/12	28.05	28.27	0.22	2.50	1.00	1.50			
02/11/12	28.90	28.95	0.05	1.01	1.00	0.01			
03/24/12	27.63	31.31	3.68	7.00	2.00	5.00			
04/14/12	27.62	31.29	3.67	8.00	3.00	5.00			
05/18/12	27.66	31.55	3.89	7.00	2.00	5.00			

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
EZ-3	06/23/12	27.58	31.23	3.65	6.00	1.50	4.50	
	07/28/12	27.59	31.42	3.83	45.00	41.29	3.71	30
	08/25/12	27.71	31.42	3.71	45.00	40.76	4.24	30
	09/29/12	26.98	31.15	4.17	60.00	55.44	4.56	60
	10/13/12	26.96	31.09	4.13	35.00	31.29	3.71	30
	10/27/12	27.14	30.89	3.75	13.00	12.15	0.85	35
	12/01/12	27.41	31.23	3.82	30.00	27.35	2.65	40
	01/05/13	27.95	30.50	2.55	30.00	27.35	2.65	60
	02/23/13	28.07	31.45	3.38	33.00	30.03	2.97	40
	04/20/13	27.98	31.20	3.22	20.00	17.88	2.12	35
	05/18/13	28.05	31.35	3.30	37.00	33.29	3.71	46
	06/22/13	27.82	31.28	3.46	21.00	18.77	2.23	40
	07/20/13	27.96	31.09	3.13	22.00	19.67	2.33	45
	08/17/13	28.21	31.21	3.00	25.00	22.88	2.12	40
	09/14/13	28.30	31.24	2.94	43.00	39.29	3.71	50
	10/19/13	28.53	31.45	2.92	24.00	21.46	2.54	45
	11/16/13	28.54	31.32	2.78	25.00	22.88	2.12	35
	12/14/13	28.20	31.31	3.11	23.00	20.56	2.44	40
	01/11/14	28.54	30.95	2.41	27.00	24.88	2.12	60
	02/08/14	No Access			--	--	--	--
06/21/14	29.10	31.30	2.20	15.00	13.41	1.59	30	
07/19/14	29.31	31.59	2.28	20.00	17.88	2.12	50	
<b>Sub Total EZ-3:</b>						<b>618.27</b>	<b>175.84</b>	
EZ-4	09/16/10	28.59	29.89	1.30	10.00	9.00	1.00	
	09/25/10	29.57	30.97	1.40	6.00	3.00	3.00	
	10/02/10	29.65	29.97	0.32	5.00	4.00	1.00	
	10/07/10	29.74	30.76	1.02	3.50	3.00	0.50	
	10/16/10	29.75	30.81	1.06	4.00	3.50	0.50	
	10/23/10	29.81	30.72	0.91	2.00	1.50	0.50	
	10/30/10	29.89	30.55	0.66	2.00	1.50	0.50	
	11/06/10	29.85	30.91	1.06	3.00	2.00	1.00	
	12/04/10	30.05	30.94	0.89	2.50	2.00	0.50	
	12/08/10	30.13	30.58	0.45	3.00	2.00	1.00	
	01/08/11	29.12	29.38	0.26	1.00	1.00	Sheen	
	01/26/11	29.02	29.15	0.13	0.50	0.37	0.13	
	02/05/11	29.07	29.17	0.10	0.50	0.50	Sheen	
	02/12/11	29.18	29.29	0.11	1.00	1.00	Sheen	
	02/19/11	29.11	29.18	0.07	1.00	1.00	Sheen	
	02/23/11	29.17	29.22	0.05	1.00	1.00	Sheen	
	03/05/11	29.12	29.17	0.05	1.00	1.00	Sheen	
	03/19/11	29.16	29.21	0.05	0.50	0.50	Sheen	
	03/26/11	29.10	29.13	0.03	1.00	1.00	Sheen	
	04/02/11	29.09	29.10	0.01	1.00	1.00	Sheen	
	04/09/11	29.08	29.11	0.03	1.00	1.00	Sheen	
	04/16/11	29.10	29.13	0.03	1.00	1.00	Sheen	
	04/23/11	29.36	29.39	0.03	0.50	0.50	Sheen	
	04/30/11	29.42	29.45	0.03	0.50	0.50	Sheen	
	05/07/11	29.29	29.32	0.03	0.50	0.50	Sheen	
	05/14/11	29.34	29.36	0.02	1.00	1.00	Sheen	
	05/21/11	39.38	39.40	0.02	1.00	1.00	Sheen	
	05/26/11	29.42	29.45	0.03	1.00	1.00	Sheen	
	06/04/11	29.48	29.50	0.02	1.00	1.00	Sheen	
	06/11/11	29.47	29.51	0.04	1.00	1.00	Sheen	
	06/18/11	29.50	29.53	0.03	1.00	1.00	Sheen	
	06/25/11	29.54	29.65	0.11	1.00	1.00	Sheen	
07/09/11	29.64	29.75	0.11	1.00	1.00	Sheen		
07/16/11	29.70	29.78	0.08	1.00	1.00	Sheen		
07/23/11	29.75	29.86	0.11	1.00	1.00	Sheen		
08/06/11	29.82	29.87	0.05	1.00	1.00	Sheen		
08/13/11	29.81	29.86	0.05	1.00	1.00	Sheen		
08/20/11	29.84	29.88	0.04	1.00	1.00	Sheen		

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
EZ-4	08/27/11	29.88	29.94	0.06	1.00	1.00	Sheen		
	09/24/11	29.91	30.22	0.31	1.00	1.00	Sheen		
	10/08/11	29.97	30.25	0.28	1.00	1.00	Sheen		
	11/14/11	30.10	30.63	0.53	1.75	1.50	0.25		
	12/09/11	30.12	30.74	0.62	1.50	1.00	0.50		
	01/14/12	30.19	31.12	0.93	1.50	1.00	0.50		
	02/11/12	31.05	31.22	0.17	1.05	1.00	0.05		
	03/24/12	30.23	31.55	1.32	3.50	2.00	1.50		
	04/14/12	30.32	31.17	0.85	1.00	0.50	0.50		
	05/18/12	30.37	31.24	0.87	1.25	1.00	0.25		
	06/23/12	30.49	31.27	0.78	1.25	1.00	0.25		
	07/28/12	30.64	31.48	0.84	3.00	2.84	0.16	10	
	08/25/12	30.86	31.22	0.36	8.00	7.68	0.32	10	
	09/29/12	Not Measured			--	--	--	--	
	10/13/12	30.88	31.33	0.45	7.00	6.47	0.53	10	
	10/27/12	Not Measured			--	--	--	--	
	12/01/12	Not Measured			--	--	--	--	
	01/05/13	30.81	31.48	0.67	0.00	0.00	0.00		
	02/23/13	30.70	31.50	0.80	0.00	0.00	0.00		
	04/20/13	30.69	31.52	0.83	0.00	0.00	0.00		
	05/18/13	30.87	31.82	0.95	14.00	13.05	0.95	24	
	06/22/13	31.02	31.47	0.45	3.00	2.89	0.11	10	
	07/20/13	31.09	31.65	0.56	13.00	12.26	0.74	15	
	08/17/13	31.30	31.60	0.30	6.00	5.89	0.11	5	
	09/14/13	31.34	31.59	0.25	6.00	5.89	0.11	5	
	10/19/13	31.54	31.89	0.35	5.00	4.47	0.53	5	
	11/16/13	31.65	31.72	0.07	--	--	--		
	12/14/13	31.55	31.67	0.12	--	--	--		
	01/11/14	31.60	31.88	0.28	--	--	--		
	02/08/14	31.68	31.93	0.25	--	--	--		
03/15/14	31.72	32.03	0.31	--	--	--			
04/12/14	31.72	32.06	0.34	7.00	6.89	0.11	10		
05/17/14	31.83	31.97	0.14	7.00	6.79	0.21	10		
06/21/14	31.96	32.23	0.27	9.00	8.79	0.21	10		
07/19/14	32.18	32.27	0.09	7.00	6.89	0.11	10		
<b>Sub Total EZ-4:</b>					<b>159.18</b>	<b>17.62</b>			
EZ-5	01/08/11	26.03	26.04	0.01	1.00	1.00	Sheen		
	01/26/11	25.87	25.91	0.04	0.50	0.50	Sheen		
	02/05/11	28.88	28.91	0.03	0.50	0.50	Sheen		
	02/12/11	26.62	26.67	0.05	1.00	1.00	Sheen		
	02/19/11	26.58	26.64	0.06	1.00	1.00	Sheen		
	02/23/11	27.33	27.38	0.05	1.00	1.00	Sheen		
	03/05/11	27.54	27.62	0.08	1.00	1.00	Sheen		
	03/19/11	27.65	27.68	0.03	0.50	0.50	Sheen		
	04/23/11	27.86	27.87	0.01	0.50	0.50	Sheen		
	05/14/11	27.94	27.96	0.02	1.00	1.00	Sheen		
	05/26/11	28.03	28.04	0.01	1.00	1.00	Sheen		
	01/14/12	--	27.15	0.00	--	--	--		
	02/11/12	--	28.05	0.00	--	--	--		
	03/24/12	--	27.43	0.00	--	--	--		
	04/14/12	--	27.40	0.00	--	--	--		
	05/18/12	--	27.43	0.00	--	--	--		
	06/23/12	27.36	27.52	0.16	1.10	1.00	0.10		
	07/28/12	27.42	27.80	3.80	1.00	0.95	0.05	3	
	08/25/12	27.52	27.86	0.34	1.50	1.45	0.05	3	
	09/29/12	27.08	27.12	0.04	--	--	--		
	10/13/12	26.96	27.02	0.06	7.00	6.79	0.21	5	
	10/27/12	Not Measured			--	--	--	--	
	12/01/12	Not Measured			--	--	--	--	
	01/05/13	Not Measured			--	--	--	--	
02/23/13	27.78	27.85	0.07	--	--	--			
04/20/13	27.75	27.80	0.05	--	--	--			
05/18/13	27.86	27.91	0.05	--	--	--			
06/22/13	27.68	27.69	0.01	--	--	--			
07/20/13	29.73	29.76	0.03	--	--	--			
08/17/13	27.94	27.98	0.04	--	--	--			
09/14/13	27.99	28.04	0.05	--	--	--			
10/19/13	28.24	28.30	0.06	--	--	--			
11/16/13	28.28	28.33	0.05	--	--	--			
12/14/13	28.05	28.07	0.02	--	--	--			

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
EZ-5	01/11/14	28.20	28.23	0.03	--	--	--	
	02/08/14	28.42	28.51	0.09	--	--	--	
	03/15/14	28.61	28.72	0.11	--	--	--	
	04/12/14	28.48	28.52	0.04	--	--	--	
	05/17/14	28.54	28.60	0.06	--	--	--	
	06/21/14	28.64	28.72	0.08	--	--	--	
	07/19/14	28.80	28.90	0.10	--	--	--	
<b>Sub Total EZ-5:</b>						<b>19.18</b>	<b>0.42</b>	
EZ-6	09/16/10	--	20.05	--	27.00	27.00	0.00	
	09/25/10	20.08	20.19	0.11	1.00	0.80	0.20	
	10/02/10	20.14	20.21	0.07	1.00	0.75	0.25	
	10/07/10	20.16	20.22	0.06	2.00	1.80	0.20	
	10/16/10	--	20.22	--	1.00	1.00	Trace	
	10/23/10	20.24	20.25	0.01	1.00	1.00	0.00	
	10/30/10	20.25	20.26	0.01	1.00	1.00	0.00	
	11/06/10	20.28	20.29	0.01	1.00	1.00	0.00	
	12/04/10	20.31	20.56	0.25	1.00	1.00	0.00	
	12/08/10	20.34	20.35	0.01	1.00	1.00	0.00	
	01/08/11	19.16	19.27	0.11	0.50	0.50	Sheen	
	02/12/11	19.38	19.45	0.07	1.00	1.00	Sheen	
	02/19/11	19.38	19.42	0.04	1.00	1.00	Sheen	
	02/23/11	19.41	19.45	0.04	1.00	1.00	Sheen	
	03/05/11	19.33	19.36	0.03	1.00	1.00	Sheen	
	03/19/11	19.33	19.38	0.05	0.50	0.50	Sheen	
	03/26/11	19.29	19.30	0.01	1.00	1.00	Sheen	
	04/23/11	19.48	19.51	0.03	0.50	0.50	Sheen	
	04/30/11	19.55	19.57	0.02	0.50	0.50	Sheen	
	05/07/11	19.41	19.45	0.04	0.50	0.50	Sheen	
	05/14/11	19.45	19.46	0.01	1.00	1.00	Sheen	
	05/21/11	19.48	19.49	0.01	1.00	1.00	Sheen	
	05/26/11	19.52	19.54	0.02	1.00	1.00	Sheen	
	06/04/11	19.56	19.57	0.01	1.00	1.00	Sheen	
	06/11/11	19.58	19.59	0.01	1.00	1.00	Sheen	
	06/18/11	19.61	19.63	0.02	1.00	1.00	Sheen	
	06/25/11	19.65	19.68	0.03	1.00	1.00	Sheen	
	07/09/11	19.70	19.71	0.01	1.00	1.00	Sheen	
	07/16/11	19.78	19.80	0.02	1.00	1.00	Sheen	
	07/23/11	19.82	19.83	0.01	1.00	1.00	Sheen	
	11/14/11	20.35	20.36	0.01	1.00	1.00	Sheen	
	12/10/11	20.28	20.29	0.01	20.00	20.00	Sheen	
	01/14/12	--	20.38	0.00	0.00	0.00	0.00	
	02/11/12	--	20.98	0.00	0.00	0.00	0.00	
	03/24/12	--	20.33	0.00	0.00	0.00	0.00	
	04/14/12	--	20.28	0.00	--	--	--	
	05/18/12	20.28	20.31	0.03	20.00	20.00	0.00	
	06/23/12	--	20.39	0.00	--	--	--	
	07/28/12	--	20.51	--	--	--	--	
	08/25/12	20.61	20.65	0.04	1.10	1.09	0.01	1
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	--	20.76	0.00	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	--	20.58	0.00	--	--	--	
	04/20/13	--	20.56	0.00	--	--	--	
05/18/13	20.75	20.76	0.01	--	--	--		
06/22/13	20.84	20.88	0.04	--	--	--		
07/20/13	20.77	21.61	0.84	--	--	--		
08/17/13	20.66	22.82	2.16	5.00	4.68	0.32	5	
09/14/13	20.82	21.84	1.02	0.00	0.00	0.00	0	
10/19/13	20.93	22.98	2.05	25.00	22.35	2.65	5	
11/16/13	21.04	22.91	1.87	22.00	20.41	1.59	10	
12/14/13	21.05	23.03	1.98	13.00	12.26	0.74	10	
01/11/14	21.08	23.03	1.95	15.00	14.05	0.95	10	
02/08/14	21.03	23.06	2.03	15.00	13.94	1.06	15	
03/15/14	21.16	23.12	1.96	17.00	15.94	1.06	15	
04/12/14	21.20	23.17	1.97	10.00	8.94	1.06	10	
05/17/14	21.31	23.28	1.97	17.00	15.20	1.80	20	
06/21/14	21.43	23.40	1.97	10.00	8.94	1.06	15	
07/19/14	21.57	23.53	1.96	13.00	12.68	0.32	10	

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
EZ-6	11/01/14	22.00	22.75	0.75	2.14	0.20	1.94	--
	11/15/14	23.58	23.64	0.06	0.00	0.00	0.00	--
	12/06/14	23.44	23.61	0.17	0.00	0.00	0.00	--
	12/20/14	23.51	23.54	0.03	0.29	0.00	0.29	--
<b>Sub Total EZ-6:</b>						<b>245.52</b>	<b>15.51</b>	
EZ-7	08/17/13	--	19.91	0.00	--	--	--	
	09/14/13	--	20.06	0.00	--	--	--	
	10/19/13	--	20.18	0.00	--	--	--	
	11/16/13	--	20.24	0.00	--	--	--	
	12/14/13	--	20.26	0.00	--	--	--	
	01/11/14	--	20.27	0.00	--	--	--	
	02/08/14	--	20.32	0.00	--	--	--	
	03/15/14	--	20.35	0.00	--	--	--	
	04/12/14	--	20.40	0.00	--	--	--	
	05/17/14	--	20.52	0.00	--	--	--	
06/21/14	--	20.63	0.00	--	--	--		
07/19/14	--	20.80	0.00	--	--	--		
<b>Sub Total EZ-7:</b>						<b>0.00</b>	<b>0.00</b>	
EZ-8	08/17/13	--	20.88	0.00	--	--	--	
	09/14/13	--	21.00	0.00	--	--	--	
	10/19/13	--	21.14	0.00	--	--	--	
	11/16/13	--	21.21	0.00	--	--	--	
	12/14/13	--	21.21	0.00	--	--	--	
	01/11/14	--	21.22	0.00	--	--	--	
	02/08/14	--	21.29	0.00	--	--	--	
	03/15/14	--	21.30	0.00	--	--	--	
	04/12/14	--	21.34	0.00	--	--	--	
	05/17/14	--	--	--	--	Unable to Access		--
06/21/14	--	21.61	0.00	--	--	--		
07/19/14	--	21.74	0.00	--	--	--		
<b>Sub Total EZ-8:</b>						<b>0.00</b>	<b>0.00</b>	
EZ-9	04/14/12	--	--	--	--	--	--	
	05/18/12	22.97	23.17	0.20	20.00	20.00	0.00	
	06/23/12	--	--	--	--	--	--	
	07/28/12	--	--	--	--	--	--	
	08/25/12	23.26	23.88	0.62	10.00	9.47	0.53	3
	09/29/12	23.44	23.52	0.08	--	--	--	
	10/13/12	Not Measured		--	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	23.40	23.67	0.27	7.00	6.89	0.11	15
	01/05/13	23.34	23.60	0.26	6.00	5.89	0.11	10
	02/23/13	--	23.41	0.00	--	--	--	
	04/20/13	23.30	23.32	0.02	--	--	--	
	05/18/13	--	23.65	0.00	--	--	--	
	06/22/13	23.75	23.78	0.03	--	--	--	
	07/20/13	23.85	23.87	0.02	--	--	--	
	08/17/13	23.83	23.88	0.05	--	--	--	
	09/14/13	24.09	24.13	0.04	--	--	--	
	10/19/13	24.09	24.14	0.05	--	--	--	
	11/16/13	--	24.16	0.00	--	--	--	
	12/14/13	24.14	24.21	0.07	--	--	--	
	01/11/14	24.15	24.24	0.09	--	--	--	
	02/08/14	24.23	24.31	0.08	--	--	--	
	03/15/14	24.25	24.35	0.10	--	--	--	
04/12/14	24.28	24.38	0.10	--	--	--		
05/17/14	--	--	--	Unable to Access		--		
06/21/14	24.50	24.60	0.10	10.00	9.89	0.11		
07/19/14	--	24.65	0.00	--	--	--		
<b>Sub Total EZ-9:</b>						<b>52.15</b>	<b>0.85</b>	

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EZ-10	08/17/13	--	23.78	0.00	--	--	--	
	09/14/13	--	23.87	0.00	--	--	--	
	10/19/13	--	24.03	0.00	--	--	--	
	11/16/13	--	24.11	0.00	--	--	--	
	12/14/13	--	24.06	0.00	--	--	--	
	01/11/14	--	24.09	0.00	--	--	--	
	02/08/14	--	24.16	0.00	--	--	--	
	03/15/14	--	24.19	0.00	--	--	--	
	04/12/14	--	24.22	0.00	--	--	--	
	05/17/14	--	--	--	--	Unable to Access		--
06/21/14	--	24.44	0.00	--	--	--		
07/19/14	--	24.77	0.00	--	--	--		
<b>Sub Total EZ-10:</b>						<b>0.00</b>	<b>0.00</b>	
EZ-11	07/20/13	Not Measured		--	--	--	--	
	07/22/13	--	32.22	0.00	--	--	--	
	08/17/13	--	32.39	0.00	--	--	--	
	09/14/13	--	32.45	0.00	--	--	--	
	10/19/13	32.60	32.63	0.03	--	--	--	
	11/16/13	--	32.48	0.00	--	--	--	
	12/14/13	--	32.58	0.00	--	--	--	
	01/11/14	--	32.65	0.00	--	--	--	
	02/08/14	--	32.75	0.00	--	--	--	
	03/15/14	--	32.79	0.00	--	--	--	
	04/12/14	--	32.79	0.00	--	--	--	
	05/17/14	--	32.87	0.00	--	--	--	
	06/21/14	--	33.00	0.00	--	--	--	
07/19/14	--	33.14	0.00	--	--	--		
<b>Sub Total EZ-11:</b>						<b>0.00</b>	<b>0.00</b>	
EZ-12	09/17/11	27.29	27.31	0.02	0.00	0.00	0.00	
	09/24/11	26.98	28.10	1.12	2.00	1.50	0.50	
	10/08/11	26.98	28.14	1.16	1.50	1.00	0.50	
	11/14/11	27.13	28.47	1.34	2.50	1.25	1.25	
	12/10/11	27.19	28.55	1.36	2.00	1.00	1.00	
	01/14/12	27.32	28.79	1.47	2.50	1.50	1.00	
	02/11/12	28.27	29.62	1.35	3.00	2.00	1.00	
	03/24/12	27.43	28.93	1.50	2.75	2.50	1.25	
	04/14/12	27.39	28.83	1.44	3.00	2.00	1.00	
	05/18/12	27.39	28.85	1.46	3.75	2.00	1.75	
	06/23/12	27.44	29.00	1.56	2.50	1.50	1.00	
	07/28/12	27.52	29.09	1.57	42.00	38.29	3.71	20
	08/25/12	27.57	29.16	1.59	40.00	37.35	2.65	20
	09/29/12	27.54	28.95	1.41	50.00	45.44	4.56	40
	10/13/12	27.56	29.84	2.28	23.00	20.56	2.44	15
	10/27/12	--	--	--	15.00	14.15	0.85	25
	12/01/12	27.59	29.08	1.49	41.00	37.50	3.50	37
	01/05/13	27.73	29.24	1.51	43.00	38.76	4.24	65
	02/23/13	27.78	29.30	1.52	25.00	22.88	2.12	30
	04/20/13	27.72	29.21	1.49	28.00	25.03	2.97	30
	05/18/13	27.88	29.45	1.57	67.00	60.85	6.15	37
	06/22/13	27.90	29.50	1.60	45.00	40.76	4.24	42
	07/20/13	27.94	29.52	1.58	55.00	49.17	5.83	55
	08/17/13	28.17	29.80	1.63	30.00	26.82	3.18	45
	09/14/13	28.27	29.94	1.67	33.00	29.50	3.50	60
	10/19/13	28.35	30.06	1.71	25.00	22.35	2.65	60
	11/16/13	28.51	30.22	1.71	41.00	36.65	4.35	40
	12/14/13	28.62	30.40	1.78	40.00	35.76	4.24	40
	01/11/14	28.60	30.35	1.75	43.00	38.44	4.56	60
	02/08/14	28.75	30.56	1.81	60.00	55.76	4.24	90
03/15/14	28.80	30.64	1.84	85.00	78.11	6.89	100	
04/12/14	28.80	30.68	1.88	40.00	35.76	4.24	60	
05/17/14	28.88	30.77	1.89	40.00	36.29	3.71	60	
06/21/14	28.93	30.79	1.86	28.00	25.03	2.97	40	
07/19/14	29.14	31.06	1.92	10.00	9.47	0.53	40	
11/01/14	29.65	30.96	1.31	2.50	0.50	2.00	--	
11/15/14	29.73	31.13	1.40	2.50	0.50	2.00	--	
12/06/14	29.85	31.29	1.44	2.90	0.50	2.40	--	
12/20/14	29.90	31.28	1.38	3.24	0.50	1.74	--	
<b>Sub Total EZ-12:</b>						<b>878.95</b>	<b>106.69</b>	

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
EZ-13	07/28/12	--	25.28	--	--	--	--	
	08/25/12	--	25.38	--	--	--	--	
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	Not Measured		--	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	--	25.48	--	--	--	--	
	04/20/13	--	25.43	--	--	--	--	
	05/18/13	--	25.62	--	--	--	--	
	06/22/13	--	25.66	--	--	--	--	
	07/20/13	25.48	26.74	1.26	--	--	--	
	08/17/13	22.58	24.25	1.67	20.00	18.73	1.27	10
	09/14/13	25.74	27.40	1.66	21.00	19.52	1.48	10
	10/19/13	25.83	27.45	1.62	15.00	13.41	1.59	10
	11/16/13	26.28	26.41	0.13	6.00	5.89	0.11	10
	12/14/13	26.34	26.45	0.11	--	--	--	
	01/11/14	26.37	26.47	0.10	--	--	--	
	02/08/14	26.40	26.85	0.45	--	--	--	
	03/15/14	26.20	27.81	1.61	11.00	10.26	0.74	10
	04/12/14	26.50	26.51	0.01	0.00	0.00	0.00	0
	05/17/14	26.62	26.65	0.03	--	--	--	
	06/21/14	26.67	26.88	0.21	--	--	--	
07/19/14	26.84	27.07	0.23	--	--	--		
11/01/14	27.30	27.42	0.12	0.00	0.00	0.00		
11/15/14	27.41	27.49	0.08	0.00	0.00	0.00		
12/06/14	27.52	27.59	0.07	0.00	0.00	0.00		
12/20/14	--	27.52	0.00	0.20	0.10	0.10		
<b>Sub Total EZ-13:</b>						<b>67.91</b>	<b>5.29</b>	
EZ-14	11/14/11	20.65	22.52	1.87	3.00	1.50	1.50	
	12/10/11	20.63	22.50	1.87	2.00	0.50	1.50	
	1/14/12	20.73	22.61	1.88	2.50	1.50	1.00	
	2/11/12	21.47	23.19	1.72	3.00	2.00	1.00	
	3/24/12	20.78	22.63	1.85	2.25	1.50	1.75	
	04/14/12	20.71	22.48	1.77	2.75	1.25	1.50	
	05/18/12	20.71	22.47	1.76	3.75	2.00	1.75	
	06/23/12	20.81	22.68	1.87	1.25	1.00	0.25	
	07/28/12	20.93	22.80	1.87	30.00	27.35	2.65	25
	08/25/12	21.00	22.87	1.87	20.00	18.41	1.59	25
	09/29/12	21.09	22.08	0.99	35.00	33.41	1.59	25
	10/13/12	21.15	22.95	1.80	15.00	13.41	1.59	10
	10/27/12	21.13	22.87	1.74	15.00	13.94	1.06	20
	12/01/12	21.15	23.00	1.85	40.00	37.35	2.65	25
	01/05/13	21.12	22.86	1.74	22.00	20.73	1.27	20
	02/23/13	21.09	22.71	1.62	21.00	19.30	1.70	22
	04/20/13	21.03	22.72	1.69	24.00	22.20	1.80	20
	05/18/13	21.21	23.00	1.79	14.00	13.05	0.95	7
	06/22/13	21.26	23.12	1.86	27.00	24.88	2.12	20
	07/20/13	21.33	23.19	1.86	10.00	8.94	1.06	15
	08/17/13	21.48	23.35	1.87	20.00	18.41	1.59	20
	09/14/13	21.68	23.53	1.85	7.00	6.26	0.74	20
	10/19/13	21.81	23.63	1.82	10.00	8.94	1.06	10
	11/16/13	21.91	23.69	1.78	10.00	9.15	0.85	15
	12/14/13	22.00	23.77	1.77	14.00	13.15	0.85	10
	01/11/14	22.00	23.78	1.78	15.00	13.94	1.06	10
	02/08/14	22.02	23.80	1.78	17.00	16.26	0.74	15
	03/15/14	22.10	23.86	1.76	24.00	22.52	1.48	15
04/12/14	22.13	23.89	1.76	14.00	12.52	1.48	10	
05/17/14	22.22	24.00	1.78	25.00	22.88	2.12	15	
06/21/14	22.33	24.08	1.75	14.00	12.52	1.48	15	
07/19/14	22.49	24.20	1.71	13.00	12.68	0.32	10	
11/01/14	23.10	23.97	0.87	2.14	0.25	1.89		
11/15/14	23.52	23.65	0.13	0.00	0.00	0.00	--	
12/06/14	23.51	24.00	0.49	0.60	0.10	0.50	--	
12/20/14	23.34	23.53	0.19	1.11	0.81	0.30	--	
<b>Sub Total EZ-14:</b>						<b>434.60</b>	<b>46.75</b>	

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**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
EZ-15	04/14/12	--	30.87	0.00	--	--	--	
	05/18/12	--	30.91	0.00	--	--	--	
	06/23/12	30.67	31.98	1.31	1.25	1.00	0.25	
	07/28/12	30.63	32.14	1.51	10.00	9.47	0.53	10
	08/25/12	31.03	31.25	0.22	10.00	9.47	0.53	10
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	--	30.44	0.00	--	--	--	
	10/27/12	--	30.46	0.00	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	31.27	31.62	0.35	--	--	--	
	04/20/13	30.89	32.51	1.62	--	--	--	
	05/18/13	30.99	32.60	1.61	18.00	16.30	1.70	25
	06/22/13	31.05	31.10	0.05	--	--	--	--
	07/20/13	31.08	31.15	0.07	--	--	--	--
	08/17/13	31.25	31.33	0.08	--	--	--	--
	09/14/13	31.29	31.38	0.09	--	--	--	--
	10/19/13	31.34	32.51	1.17	--	--	--	--
	11/16/13	31.08	32.71	1.63	3.00	2.68	0.32	5
	12/14/13	30.70	31.26	0.56	6.00	5.89	0.11	5
01/11/14	30.92	31.19	0.27	6.00	5.89	0.11	8	
02/08/14	No Access		--	--	--	--	--	
07/19/14	31.42	33.17	1.75	--	--	--	--	
<b>Sub Total EZ-15:</b>						<b>50.71</b>	<b>3.54</b>	
EZ-16	07/28/12	--	28.00	0.00	--	--	--	
	08/25/12	--	28.11	0.00	--	--	--	
	09/29/12	Not Measured		--	--	--	--	
	10/13/12	Not Measured		--	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	--	28.30	0.00	--	--	--	
	04/20/13	--	28.29	0.00	--	--	--	
	05/18/13	--	28.30	0.00	--	--	--	
	06/22/13	--	28.05	0.00	--	--	--	
	07/20/13	--	28.10	0.00	--	--	--	
	08/17/13	--	28.29	0.00	--	--	--	
	09/14/13	--	28.33	0.00	--	--	--	
	10/19/13	--	28.63	0.00	--	--	--	
	11/16/13	--	28.45	0.00	--	--	--	
	12/14/13	--	27.88	0.00	--	--	--	
01/11/14	--	28.06	0.00	--	--	--		
02/08/14	No Access		--	--	--	--	--	
07/19/14	28.77	29.19	0.42	--	--	--	--	
<b>Sub Total EZ-16:</b>						<b>0.00</b>	<b>0.00</b>	
EZ-17	10/19/13	30.20	31.46	1.26	--	--	--	
	11/16/13	30.00	31.75	1.75	10.00	9.15	0.85	5
	12/14/13	29.70	29.96	0.26	7.00	6.89	0.11	5
	01/11/14	29.84	30.02	0.18	5.00	4.89	0.11	5
	02/08/14	No Access		--	--	--	--	--
	06/21/14	30.20	32.04	1.84	9.00	8.05	0.95	15
	07/19/14	30.35	32.21	1.86	8.00	7.47	0.53	20
<b>Sub Total EZ-17:</b>						<b>36.46</b>	<b>2.54</b>	
EZ-18	01/11/14	32.40	32.82	0.42	--	--	--	
	02/08/14	No Access		--	--	--	--	
	07/19/14	32.95	34.61	1.66	--	--	--	
<b>Sub Total EZ-17:</b>						<b>0.00</b>	<b>0.00</b>	

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**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
RW-1A	08/15/13	--	30.09	0.00	--	--	--		
	08/24/13	--	30.15	0.00	--	--	--		
	09/12/13	--	30.29	0.00	--	--	--		
	03/27/14	30.18	31.52	1.34	--	--	--		
	04/12/14	30.32	31.92	1.60	14.00	13.15	0.85	15	
	04/21/14	30.45	31.98	1.53	--	--	--		
	04/25/14	--	31.40	0.00	--	--	--		
	05/01/14	--	30.09	0.00	--	--	--		
	05/17/14	--	--	--	--	Connected to HVDPE - Extracting			
	05/22/14	--	29.85	0.00	--	Connected to HVDPE - Extracting			
	06/06/14	--	29.25	0.00	--	Connected to HVDPE - Extracting			
	06/12/14	30.50	31.55	1.05	--	Connected to HVDPE - Not Extracting			
	06/19/14	30.50	31.54	1.04	--	Connected to HVDPE - Not Extracting			
	06/26/14	--	30.34	0.00	--	Connected to HVDPE - Extracting			
	07/04/14	30.31	30.33	0.02	--	Connected to HVDPE - Extracting			
	07/10/14	30.32	30.35	0.03	--	Connected to HVDPE - Extracting			
	07/17/14	29.09	29.10	0.01	--	Connected to HVDPE - Extracting			
	07/19/14	--	--	--	--	Connected to HVDPE - Extracting			
	07/24/14	29.13	29.15	0.02	--	Connected to HVDPE - Extracting			
	07/31/14	29.14	29.16	0.02	--	Connected to HVDPE - Extracting			
	08/08/14	--	29.65	0.00	--	Connected to HVDPE - Extracting			
	09/04/14	30.95	31.03	0.08	--	Connected to HVDPE - Extracting			
	09/19/14	31.50	31.53	0.03	--	Connected to HVDPE - Extracting			
	09/24/14	--	31.40	0.00	--	Connected to HVDPE - Extracting			
	10/02/14	--	31.30	0.00	--	Connected to HVDPE - Extracting			
	10/10/14	--	31.13	0.00	--	Connected to HVDPE - Extracting			
	10/20/14	31.85	32.45	0.60	--	Connected to HVDPE - Not Extracting			
	10/28/14	30.95	32.30	1.35	1.50	0.50	1.00		
	11/06/14	--	33.05	0.00	--	Connected to HVDPE - Extracting			
	11/13/14	31.29	32.23	0.94	--	Connected to HVDPE - Extracting			
	11/21/14	--	33.10	0.00	--	Connected to HVDPE - Extracting			
	11/24/14	31.66	32.36	0.70	--	Connected to HVDPE - Not Extracting			
12/05/14	--	33.15	0.00	--	Connected to HVDPE - Extracting				
12/09/14	--	33.35	0.00	--	Connected to HVDPE - Extracting				
12/18/14	--	33.20	0.00	--	Connected to HVDPE - Extracting				
12/26/14	--	33.13	0.00	--	Connected to HVDPE - Extracting				
12/30/14	--	31.75	0.00	--	Connected to HVDPE - Not Extracting				
<b>Sub Total RW-1A:</b>					<b>13.65</b>	<b>1.85</b>			
RW-2	10/02/13	--	28.23	0.00	--	--	--		
	03/27/14	--	29.07	0.00	--	--	--		
	06/21/14	--	--	--	Car Parked on Well				
	07/19/14	--	29.55	0.00	--	--	--		
	11/06/14	--	29.87	0.00	--	--	--		
	11/13/14	--	29.90	0.00	--	--	--		
	11/21/14	--	29.75	0.00	--	--	--		
	11/24/14	--	30.97	0.00	--	--	--		
	12/05/14	29.85	29.86	0.01	--	--	--		
	12/09/14	30.10	30.11	0.01	--	--	--		
	12/18/14	30.15	30.16	0.01	--	--	--		
	12/26/14	30.02	30.05	0.03	--	--	--		
	<b>Sub Total RW-2:</b>					<b>0.00</b>	<b>0.00</b>		
RW-3R	10/02/13	--	29.13	0.00	--	--	--		
	03/27/14	--	29.92	0.00	--	--	--		
	06/21/14	--	30.08	0.00	--	--	--		
	07/19/14	--	30.36	0.00	--	--	--		
	10/20/14	30.15	31.17	1.02	--	--	--		
	10/28/14	--	--	--	3.75	3.00	0.75		
	11/06/14	29.58	31.38	1.80	0.90	0.10	0.80	--	
	11/13/14	30.58	31.35	0.77	1.00	0.30	0.70	--	
	11/21/14	30.45	31.23	0.78	1.00	0.30	0.70	--	
	11/24/14	30.78	31.13	0.35	--	--	--		
	12/05/14	30.60	31.18	0.58	0.70	0.20	0.50	--	
	12/09/14	30.84	31.15	0.31	0.50	0.25	0.25	--	
	12/18/14	31.00	31.14	0.14	0.40	0.10	0.30	--	
	12/26/14	30.90	30.93	0.03	0.00	0.00	0.00	--	
<b>Sub Total RW-3R:</b>					<b>4.25</b>	<b>4.00</b>			

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**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)	
RW-4	08/15/13	--	29.24	0.00	--	--	--		
	08/24/13	--	29.30	0.00	--	--	--		
	09/12/13	--	29.40	0.00	--	--	--		
	10/02/13	--	29.39	0.00	--	--	--		
	10/29/13	--	29.42	0.00	--	--	--		
	03/27/14	--	30.19	0.00	--	--	--		
	06/21/14	--	30.24	0.00	--	--	--		
	07/19/14	--	30.52	0.00	--	--	--		
	10/28/14	--	--	--	--	0.75	0.40	0.35	
	11/06/14	29.85	31.30	1.45	0.60	0.10	0.50	--	
	11/13/14	30.60	32.03	1.43	1.75	0.30	1.45	--	
	11/21/14	30.55	31.92	1.37	2.00	0.50	1.50	--	
	11/24/14	30.72	32.10	1.38					
	12/05/14	30.65	32.10	1.45	2.20	0.30	1.50	--	
12/09/14	30.78	31.93	1.15	1.80	0.30	1.50	--		
12/18/14	30.84	32.42	1.58	2.50	0.50	2.00	--		
12/26/14	30.79	32.22	1.43	2.30	0.50	1.80	--		
<b>Sub Total RW-4:</b>						<b>2.90</b>	<b>10.60</b>		
RW-5	07/28/12	28.90	29.13	0.23	0.60	0.59	0.01	1	
	08/25/12	28.98	29.24	0.26	0.60	0.59	0.01	1	
	09/29/12	Not Measured		--	--	--	--		
	10/13/12	--	28.92	0.00	--	--	--		
	10/27/12	Not Measured		--	--	--	--		
	12/01/12	Not Measured		--	--	--	--		
	01/05/13	Not Measured		--	--	--	--		
	02/23/13	29.18	29.19	0.01	--	--	--		
	04/20/13	29.18	29.21	0.03	--	--	--		
	05/18/13	Not Measured - Connected to HVDPE						--	
	06/22/13	Not Measured - Connected to HVDPE						--	
	07/02/13	29.91	30.22	0.31	Connected to HVDPE				
	07/09/13	29.96	30.25	0.29	Connected to HVDPE				
	07/20/13	Not Measured - Connected to HVDPE						--	
	08/15/13	29.65	30.19	0.54	Connected to HVDPE				
	08/17/13	Not Measured - Connected to HVDPE						--	
	08/24/13	30.49	31.10	0.61	Connected to HVDPE				
	09/12/13	30.70	31.45	0.75	Connected to HVDPE				
	10/02/13	29.72	29.97	0.25	System Down for Repair				
	10/19/13	29.68	30.18	0.50	--	--	--		
	10/29/13	29.67	30.19	0.52	Connected to HVDPE				
	11/16/13	--	--	--	Connected to HVDPE - Not Extracting				
	12/14/13	--	--	--	Connected to HVDPE - Extracting				
	12/20/13	31.50	32.00	0.50	Connected to HVDPE - Extracting				
	01/07/14	31.95	32.03	0.08	Connected to HVDPE - Extracting				
	01/16/14	31.99	32.04	0.05	Connected to HVDPE - Extracting				
	01/23/14	32.01	32.06	0.05	Connected to HVDPE - Extracting				
	01/27/14	32.00	32.03	0.03	Connected to HVDPE - Extracting				
	02/06/14	32.00	32.01	0.01	Connected to HVDPE - Extracting				
	02/24/14	30.49	30.53	0.04	Connected to HVDPE - Extracting				
	02/27/14	--	31.60	0.00	Connected to HVDPE - Extracting				
	03/27/14	--	31.63	0.00	Connected to HVDPE - Extracting				
	04/12/14	30.48	30.65	0.17	Connected to HVDPE - Not Extracting				
	05/01/14	30.60	30.90	0.30	Connected to HVDPE - Not Extracting				
05/17/14	30.64	31.14	0.50	Connected to HVDPE - Not Extracting					
06/06/14	30.62	30.88	0.26	Connected to HVDPE - Extracting					
06/12/14	30.60	30.71	0.11	Connected to HVDPE - Extracting					
06/19/14	30.66	30.70	0.04	Connected to HVDPE - Extracting					
06/26/14	--	30.55	0.00	Connected to HVDPE - Extracting					
07/04/14	--	30.53	0.00	Connected to HVDPE - Extracting					
07/10/14	--	30.54	0.00	Connected to HVDPE - Extracting					
07/17/14	--	30.52	0.00	Connected to HVDPE - Extracting					
07/19/14	--	--	--	Connected to HVDPE - Extracting					
07/24/14	--	30.71	0.00	Connected to HVDPE - Extracting					
07/31/14	--	30.71	0.00	Connected to HVDPE - Extracting					
08/08/14	--	30.64	0.00	Connected to HVDPE - Extracting					
09/04/14	--	29.75	0.00	Connected to HVDPE - Extracting					
09/19/14	--	30.77	0.00	Connected to HVDPE - Not Extracting					
09/24/14	31.10	31.15	0.05	Connected to HVDPE - Not Extracting					

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
	RW-5	10/02/14	31.13	31.28	0.15	Connected to HVDPE - Extracting		
10/10/14		--	30.90	0.00	Connected to HVDPE - Extracting			
10/20/14		30.68	32.02	1.34	Connected to HVDPE - Not Extracting			
10/28/14		30.67	32.35	1.68	1.25	0.50	0.75	
11/06/14		31.25	31.80	0.55	Connected to HVDPE - Extracting			
11/13/14		30.04	31.84	1.80	Connected to HVDPE - Extracting			
11/21/14		30.55	31.40	0.85	Connected to HVDPE - Not Extracting			
11/24/14		30.30	31.55	1.25	Connected to HVDPE - Extracting			
12/05/14		--	33.11	0.00	2.00	0.50	1.50	
12/09/14		--	30.50	0.00	Connected to HVDPE - Extracting			
12/18/14		30.55	31.25	0.70	Connected to HVDPE - Extracting			
12/26/14		31.50	31.65	0.15	Connected to HVDPE - Extracting			
12/30/14		31.10	31.30	0.20	Connected to HVDPE - Extracting			
<b>Sub Total RW-5:</b>						<b>2.18</b>	<b>2.27</b>	
RW-6	07/02/13	29.35	29.49	0.14	--	--	--	
	07/09/13	29.38	29.51	0.13	--	--	--	
	07/22/13	29.59	29.76	0.17	--	--	--	
	07/30/13	29.69	29.82	0.13	--	--	--	
	08/07/13	29.67	29.72	0.05	--	--	--	
	08/15/13	29.97	30.15	0.18	--	--	--	
	08/24/13	30.01	30.20	0.19	--	--	--	
	09/12/13	30.19	30.34	0.15	--	--	--	
	10/02/13	--	29.85	0.00	--	--	--	
	10/29/13	--	29.89	0.00	--	--	--	
	03/27/14	--	30.22	0.00	--	--	--	
	06/21/14	--	30.42	0.00	--	--	--	
	07/19/14	30.80	30.82	0.02	--	--	--	
	11/06/14	31.60	31.61	0.01	--	--	--	
	11/13/14	--	31.31	0.00	--	--	--	
	11/21/14	--	31.65	0.00	--	--	--	
	11/24/14	--	31.67	0.00	--	--	--	
12/05/14	--	31.57	0.00	--	--	--		
12/09/14	--	31.53	0.00	--	--	--		
12/18/14	--	31.58	0.00	--	--	--		
12/26/14	--	31.46	0.00	--	--	--		
<b>Sub Total RW-6:</b>						<b>0.00</b>	<b>0.00</b>	
RW-7	07/02/13	27.61	27.69	0.08	--	--	--	
	07/09/13	27.65	27.70	0.05	--	--	--	
	07/22/13	27.85	27.91	0.06	--	--	--	
	07/30/13	27.94	28.01	0.07	--	--	--	
	08/07/13	27.89	28.00	0.11	--	--	--	
	08/15/13	28.24	28.27	0.03	--	--	--	
	08/24/13	28.30	28.32	0.02	--	--	--	
	09/12/13	28.44	28.47	0.03	--	--	--	
	10/02/13	--	28.08	0.00	--	--	--	
	03/27/14	--	28.48	0.00	--	--	--	
	06/21/14	--	28.71	0.00	--	--	--	
	07/19/14	--	29.01	0.00	--	--	--	
	11/06/14	--	29.79	0.00	--	--	--	
	11/13/14	--	29.53	0.00	--	--	--	
	11/21/14	--	29.85	0.00	--	--	--	
	11/24/14	--	29.89	0.00	--	--	--	
	12/05/14	--	29.78	0.00	--	--	--	
12/09/14	--	29.81	0.00	--	--	--		
12/18/14	--	29.78	0.00	--	--	--		
12/26/14	--	29.68	0.00	--	--	--		
<b>Sub Total RW-7:</b>						<b>0.00</b>	<b>0.00</b>	
RW-8	10/13/12	Not Measured		--	--	--	--	
	10/27/12	Not Measured		--	--	--	--	
	12/01/12	Not Measured		--	--	--	--	
	01/05/13	Not Measured		--	--	--	--	
	02/23/13	25.44	25.78	0.34	6.00	5.89	0.11	6
	04/20/13	25.38	25.61	0.23	--	--	--	
	05/18/13	Not Measured - Connected to HVDPE						
	06/22/13	Not Measured - Connected to HVDPE						
	07/02/13	25.20	25.40	0.20	Connected to HVDPE			
	07/09/13	25.24	25.42	0.18	Connected to HVDPE			
	07/20/13	Not Measured - Connected to HVDPE						
08/15/13	--	26.15	0.00	Connected to HVDPE				

**TABLE 6**  
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**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
RW-8	08/17/13	Not Measured - Connected to HVDPE						
	08/24/13	--	26.41	0.00	Connected to HVDPE			
	09/12/13	--	26.40	0.00	Connected to HVDPE			
	10/02/13	--	26.08	0.00	System Down for Repair			
	10/19/13	--	25.10	0.00	--	--	--	
	10/29/13	--	26.11	0.00	--	--	--	
	11/16/13	--	--	--	Connected to HVDPE - Extracting			
	11/26/13	--	26.40	0.00	Connected to HVDPE - Extracting			
	12/14/13	--	--	--	Connected to HVDPE - Extracting			
	12/20/13	--	26.53	0.00	Connected to HVDPE - Extracting			
	01/11/14	--	26.44	0.00	Connected to HVDPE - Not Extracting			
	01/16/14	--	26.59	0.00	Connected to HVDPE - Not Extracting			
	01/23/14	--	26.58	0.00	Connected to HVDPE - Not Extracting			
	01/27/14	--	26.60	0.00	Connected to HVDPE - Not Extracting			
	02/06/14	--	26.59	0.00	Connected to HVDPE - Not Extracting			
	02/08/14	--	26.90	0.00	Connected to HVDPE - Not Extracting			
	02/24/14	--	26.53	0.00	Connected to HVDPE - Not Extracting			
	02/27/14	--	26.80	0.00	Connected to HVDPE - Not Extracting			
	03/15/14	--	26.45	0.00	Connected to HVDPE - Not Extracting			
	03/27/14	--	26.45	0.00	Connected to HVDPE - Not Extracting			
	04/12/14	--	--	--	Connected to HVDPE - Not Extracting			
	05/01/14	--	26.77	0.00	Connected to HVDPE - Not Extracting			
	05/17/14	--	27.03	0.00	Connected to HVDPE - Not Extracting			
	05/22/14	--	26.75	0.00	Connected to HVDPE - Not Extracting			
	06/06/14	--	26.75	0.00	Connected to HVDPE - Not Extracting			
	06/12/14	--	26.75	0.00	Connected to HVDPE - Not Extracting			
	06/19/14	--	26.76	0.00	Connected to HVDPE - Not Extracting			
	06/26/14	--	26.80	0.00	Connected to HVDPE - Not Extracting			
	07/04/14	--	26.79	0.00	Connected to HVDPE - Not Extracting			
	07/10/14	--	26.80	0.00	Connected to HVDPE - Not Extracting			
	07/17/14	--	26.79	0.00	Connected to HVDPE - Not Extracting			
	07/19/14	--	--	--	Connected to HVDPE - Not Extracting			
	07/24/14	--	26.53	0.00	Connected to HVDPE - Not Extracting			
	07/31/14	--	26.53	0.00	Connected to HVDPE - Not Extracting			
	08/08/14	--	26.82	0.00	Connected to HVDPE - Not Extracting			
09/04/14	--	26.51	0.00	Connected to HVDPE - Not Extracting				
09/19/14	--	26.50	0.00	Connected to HVDPE - Not Extracting				
09/24/14	--	--	--	Connected to HVDPE - Not Extracting				
10/02/14	--	26.84	0.00	Connected to HVDPE - Not Extracting				
10/10/14	--	26.79	0.00	Connected to HVDPE - Not Extracting				
10/20/14	--	27.24	0.00	Connected to HVDPE - Not Extracting				
11/06/14	27.77	27.78	0.01	Connected to HVDPE - Not Extracting				
11/13/14	26.90	26.91	0.01	Connected to HVDPE - Extracting				
11/21/14	--	26.93	0.00	Connected to HVDPE - Not Extracting				
11/24/14	--	27.91	0.00	Connected to HVDPE - Not Extracting				
12/05/14	--	27.69	0.00	Connected to HVDPE - Not Extracting				
12/09/14	--	27.71	0.00	Connected to HVDPE - Not Extracting				
12/18/14	--	27.45	0.00	Connected to HVDPE - Not Extracting				
12/26/14	--	27.60	0.00	Connected to HVDPE - Not Extracting				
12/30/14	--	27.85	0.00	Connected to HVDPE - Not Extracting				
<b>Sub Total RW-8:</b>						<b>5.89</b>	<b>0.11</b>	
RW-9	07/02/13	--	25.20	0.00	--	--	--	
	07/09/13	--	25.24	0.00	--	--	--	
	07/22/13	--	25.35	0.00	--	--	--	
	07/30/13	--	25.41	0.00	--	--	--	
	08/07/13	--	25.43	0.00	--	--	--	
	08/15/13	25.52	25.55	0.03	--	--	--	
	08/24/13	--	25.61	0.00	--	--	--	
	09/12/13	--	25.70	0.00	--	--	--	
	10/02/13	--	25.63	0.00	--	--	--	
	10/19/13	--	25.69	0.00	--	--	--	
	11/16/13	--	25.79	0.00	--	--	--	
	12/14/13	--	25.96	0.00	--	--	--	
	01/11/14	--	25.85	0.00	--	--	--	
	02/08/14	--	26.08	0.00	--	--	--	
	03/15/14	--	25.96	0.00	--	--	--	
04/12/14	--	26.00	0.00	--	--	--		
05/17/14	--	26.24	0.00	--	--	--		
06/21/14	--	26.24	0.00	--	--	--		
07/19/14	--	26.42	0.00	--	--	--		

**TABLE 6**  
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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
RW-9	11/06/14	--	27.05	0.00	--	--	--	
	11/13/14	--	26.49	0.00	--	--	--	
	11/21/14	--	27.09	0.00	--	--	--	
	11/24/14	--	27.12	0.00	--	--	--	
	12/05/14	--	27.10	0.00	--	--	--	
	12/09/14	--	27.05	0.00	--	--	--	
	12/18/14	--	27.16	0.00	--	--	--	
	12/26/14	--	27.02	0.00	--	--	--	
<b>Sub Total RW-9:</b>						<b>0.00</b>	<b>0.00</b>	
RW-10	08/15/13	--	26.31	0.00	--	--	--	
	08/24/13	--	26.34	0.00	--	--	--	
	09/12/13	--	26.54	0.00	--	--	--	
	10/02/13	--	26.27	0.00	--	--	--	
	10/19/13	--	26.28	0.00	--	--	--	
	10/29/13	--	26.30	0.00	--	--	--	
	11/16/13	--	25.79	0.00	--	--	--	
	12/14/13	--	26.97	0.00	--	--	--	
	01/11/14	--	26.64	0.00	--	--	--	
	02/08/14	--	27.06	0.00	--	--	--	
	03/15/14	--	26.71	0.00	--	--	--	
	04/12/14	--	26.92	0.00	--	--	--	
	05/17/14	--	27.18	0.00	--	--	--	
	06/21/14	--	26.90	0.00	--	--	--	
	07/19/14	--	27.15	0.00	--	--	--	
	11/06/14	--	27.94	0.00	--	--	--	
	11/13/14	--	27.68	0.00	--	--	--	
	11/21/14	--	27.70	0.00	--	--	--	
	11/24/14	--	28.02	0.00	--	--	--	
	12/05/14	--	27.91	0.00	--	--	--	
12/09/14	--	27.96	0.00	--	--	--		
12/18/14	--	27.91	0.00	--	--	--		
12/26/14	--	27.81	0.00	--	--	--		
<b>Sub Total RW-10:</b>						<b>0.00</b>	<b>0.00</b>	
RW-11	02/23/13	--	25.38	0.00	--	--	--	
	04/20/13	--	25.30	0.00	--	--	--	
	05/18/13	Not Measured			--	--	--	
	06/22/13	--	25.52	0.00	--	--	--	
	07/02/13	--	25.54	0.00	--	--	--	
	07/09/13	--	25.56	0.00	--	--	--	
	07/20/13	Not Measured			--	--	--	
	07/22/13	--	25.74	0.00	--	--	--	
	07/30/13	--	25.78	0.00	--	--	--	
	08/07/13	--	25.86	0.00	--	--	--	
	08/15/13	--	26.13	0.00	--	--	--	
	08/17/13	Not Measured			--	--	--	
	08/24/13	--	26.21	0.00	--	--	--	
	09/12/13	--	26.31	0.00	--	--	--	
	10/02/13	--	26.02	0.00	--	--	--	
	03/27/14	--	26.37	0.00	--	--	--	
	06/21/14	--	26.60	0.00	--	--	--	
	07/19/14	--	26.84	0.00	--	--	--	
	11/06/14	--	27.06	0.00	--	--	--	
	11/13/14	--	27.39	0.00	--	--	--	
11/21/14	--	27.70	0.00	--	--	--		
11/24/14	--	27.75	0.00	--	--	--		
12/05/14	--	27.55	0.00	--	--	--		
12/09/14	--	27.66	0.00	--	--	--		
12/18/14	--	27.53	0.00	--	--	--		
12/26/14	--	27.47	0.00	--	--	--		
<b>Sub Total RW-11:</b>						<b>0.00</b>	<b>0.00</b>	
RW-12	10/02/13	--	27.31	0.00	--	--	--	
	03/27/14	--	27.74	0.00	--	--	--	
	06/21/14	--	27.94	0.00	--	--	--	
	07/19/14	--	28.23	0.00	--	--	--	
<b>Sub Total RW-12:</b>						<b>0.00</b>	<b>0.00</b>	

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**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
RW-13	07/15/13	--	26.87	0.00	--	--	--	
	08/17/13	--	27.15	0.00	--	--	--	
	09/14/13	--	27.19	0.00	--	--	--	
	10/02/13	--	27.32	0.00	--	--	--	
	10/19/13	--	29.35	0.00	--	--	--	
	11/16/13	--	27.51	0.00	--	--	--	
	01/11/14	--	27.56	0.00	--	--	--	
	02/08/14	--	27.73	0.00	--	--	--	
	03/15/14	--	27.65	0.00	--	--	--	
	04/12/14	--	27.72	0.00	--	--	--	
	05/17/14	--	27.86	0.00	--	--	--	
	06/21/14	--	27.89	0.00	--	--	--	
07/19/14	--	28.05	0.00	--	--	--		
<b>Sub Total RW-13:</b>						<b>0.00</b>	<b>0.00</b>	
RW-14	02/23/13	25.62	25.80	0.18	--	--	--	
	04/20/13	25.58	25.73	0.15	--	--	--	
	05/18/13	Not Measured - Connected to HVDPE						
	06/22/13	Not Measured - Connected to HVDPE						
	07/02/13	--	25.19	0.00	Connected to HVDPE			
	07/09/13	--	25.23	0.00	Connected to HVDPE			
	07/20/13	Not Measured - Connected to HVDPE						
	08/15/13	--	25.63	0.00	Connected to HVDPE			
	08/17/13	Not Measured - Connected to HVDPE						
	08/24/13	--	26.15	0.00	Connected to HVDPE			
	09/12/13	26.55	26.91	0.36	Connected to HVDPE			
	10/02/13	26.11	27.02	0.91	System Down for Repair			
	10/19/13	26.06	27.35	1.29	12.00	10.73	1.27	10
	10/29/13	26.22	26.75	0.53	Connected to HVDPE			
	11/16/13	--	--	--	Connected to HVDPE - Extracting			
	11/26/13	26.20	27.15	0.95	Connected to HVDPE - Extracting			
	12/14/13	--	--	--	Connected to HVDPE - Extracting			
	12/20/13	27.85	27.90	0.05	Connected to HVDPE - Extracting			
	01/07/14	--	28.12	0.00	Connected to HVDPE - Extracting			
	01/16/14	--	28.10	0.00	Connected to HVDPE - Extracting			
	01/23/14	--	28.12	0.00	Connected to HVDPE - Extracting			
	01/27/14	--	28.12	0.00	Connected to HVDPE - Extracting			
	02/06/14	--	28.09	0.00	Connected to HVDPE - Extracting			
	02/24/14	--	26.78	0.00	Connected to HVDPE - Extracting			
	02/27/14	--	27.80	0.00	Connected to HVDPE - Extracting			
	03/15/14	No Access Due to Parked Car						
	04/03/14	27.08	27.09	0.01	Connected to HVDPE - Extracting			
	04/25/14	--	27.61	0.00	Connected to HVDPE - Extracting			
	05/01/14	--	27.57	0.00	Connected to HVDPE - Extracting			
	05/17/14	--	--	--	Connected to HVDPE - Extracting			
	05/22/14	--	27.80	0.00	Connected to HVDPE - Extracting			
	06/06/14	--	26.98	0.00	Connected to HVDPE - Not Extracting			
	06/12/14	--	26.95	0.00	Connected to HVDPE - Not Extracting			
06/19/14	--	26.94	0.00	Connected to HVDPE - Not Extracting				
06/26/14	--	26.88	0.00	Connected to HVDPE - Not Extracting				
07/04/14	--	26.87	0.00	Connected to HVDPE - Not Extracting				
07/10/14	--	26.89	0.00	Connected to HVDPE - Not Extracting				
07/17/14	--	26.90	0.00	Connected to HVDPE - Not Extracting				
07/19/14	--	--	--	Connected to HVDPE - Not Extracting				
07/24/14	--	26.97	0.00	Connected to HVDPE - Not Extracting				
07/31/14	--	26.95	0.00	Connected to HVDPE - Not Extracting				
08/08/14	--	26.97	0.00	Connected to HVDPE - Not Extracting				
09/04/14	--	26.98	0.00	Connected to HVDPE - Not Extracting				
09/19/14	--	26.94	0.00	Connected to HVDPE - Not Extracting				
09/24/14	--	--	--	Connected to HVDPE - Not Extracting				

**TABLE 6**  
**SUMMARY OF GROUNDWATER MEASUREMENTS AND FREE PRODUCT REMOVAL**  
**Rapid Gas #37 / Former EZ Serve ARCO Station (1216), 6020 / 6050 Arlington Avenue, Riverside, CA**  
**March 2010 through December 2014**

Well ID	Date FPH Removed	Depth to FPH (ft)	Depth to GW (ft)	Thickness FPH (ft)	GW & FPH Removed (gal)	GW Removed (gal)	FPH* Removed (gal)	Time Spent Extracting* (mins.)
RW-14	10/10/14	--	27.01	0.00	Connected to HVDPE - Not Extracting			
	10/20/14	27.15	28.80	1.65	Connected to HVDPE - Not Extracting			
	10/28/14	27.18	28.89	1.71	3.50	1.00	2.50	
	11/06/14	--	29.30	0.00	Connected to HVDPE - Extracting			
	11/13/14	27.63	28.04	0.41	Connected to HVDPE - Extracting			
	11/21/14	--	29.45	0.00	Connected to HVDPE - Extracting			
	11/24/14	--	29.50	0.00	Connected to HVDPE - Extracting			
	12/05/14	--	--	--	0.30	0.10	0.20	
	12/09/14	27.81	28.10	0.29	0.40	0.20	0.20	
	12/18/14	27.80	28.30	0.50	0.50	0.20	0.30	
	12/26/14	27.72	28.15	0.43	Connected to HVDPE - Not Extracting			
	12/30/14	--	28.30	0.00	Connected to HVDPE - Extracting			
	<b>Sub Total RW-14:</b>						<b>12.23</b>	<b>4.47</b>

**Volume of FPHs Removed with Skimmers and Bailing from Wells 4Q14:** **49.10**

**Volume of GW Removed with Skimmers and Bailing from Wells 4Q14:** **19.96**

**Volume of FPHs Removed with Vac Truck from Wells 2012 to 2014:** **415.40**

**Volume of Groundwater Removed with Vac Truck 2012 to 2014:** **4,645.50**

**Volume of FPHs Removed using Hand Bailing from Wells 2010 to 2012:** **296.86**

**Volume of Groundwater Removed using Hand Bailing 2010 to 2012:** **600.12**

**Total Volume of FPH Removed 2010 to 2014:** **760.36**

**Total Volume of Groundwater Removed 2010 to 2014:** **5,265.08**

**NOTES**

**Skimmer** In well free phase hydrocarbon collection device with hydrophobic passive filter.

**FPH** Free Phase Hydrocarbons

**GW** Groundwater

**gal** Gallons

**BOLD** - 3Q14 data from vacuum truck extraction events

\*

The volume of FPH extracted using a vacuum truck was evaluated on 7/19/14. Based upon this evaluation, the volume of FPH reported using visual observations of fluids in the vacuum truck knockout tank sight glass was found to be greater than the actual volume of FPH extracted as measured in drums once the fluids had settled. The actual amount as measured in the drums was 10.6% of the reported volume using the vacuum truck knockout tank sight glass. **The values of FPHs extracted between July 2012 and July 2014 have been corrected in this table based upon the results of the July 19, 2014 evaluation.**

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
MW-1R	4	15-45	01/02/2015	31.94	31.03	0.91**	No	--	--	--	4.0	1.5
			01/09/2015	31.53	30.67	0.86	No	--	--	--	2.0	1.3
			01/17/2015	31.49	30.53	0.96	No	--	--	--	1.5	0.8
			01/23/2015	31.39	30.52	0.87	No	--	--	--	2.0	1.4
			01/29/2015	31.28	30.47	0.81			(Installed on 1/29/15)		2.0	1.3
			01/30/2015	31.16*	30.83*	0.28*	Yes		(not working, floating - add weight)		1.0	0.4
			02/05/2015	31.35*	31.06*	0.29*	Yes	Yes	2	2	2.0	0.5
			02/13/2015	31.08*	31.06*	0.02*	Yes	Yes	2	2	0.5	<0.1
			02/20/2015	31.31*	31.06*	0.25*	Yes	No	1	1	2.5	0.4
			02/26/2015	31.40*	31.26*	0.14*	Yes	Yes	2	2	0.8	0.2
			03/09/2015				Yes	--	--	--	--	--
			03/16/2015	32.62*	31.92*	0.70*	Yes		(not working, re-set lower in well)		2.0	1.1
			03/23/2015	32.32*	31.64*	0.68*	Yes	Yes	2	0.5	2.0	1.1
			04/03/2015	31.94*	31.92*	0.02*	Yes	Yes	2	1	0.0	0.0
			04/14/2015	31.72	30.79	0.05	Yes		(likely - eye hook broke - bailer stuck in well)		2.0	0.1
			04/21/2015	31.85	30.71	1.14	Yes	"	"	"	3.0	1.8
			05/06/2015	31.82	30.73	1.09	Yes	"	"	"	3.0	1.6
			05/11/2015	31.79	30.76	1.03	Yes	"	"	"	2.5	1.6
			05/19/2015	31.90	30.81	1.09	Yes	"	"	"	2.0	1.7
			05/30/2015	31.89	30.82	1.07	Yes	"	"	"	2.0	1.7
			06/05/2015	31.98	30.84	1.14	Yes	"	"	"	3.0	1.8
			06/10/2015	32.00	30.86	1.14	Yes		Install new skimmer		3.0	1.7
			06/17/2015	32.83*	31.58*	1.25*	Yes	No	1.2	0.1	3.0	1.9
			06/23/2015	32.67*	31.49*	1.18*	Yes	Yes	1.2	1.2	2.5	1.4
			07/01/2015	33.03*	31.73*	1.30*	Yes	Yes	1.2	1.2	2.5	2.0
			07/06/2015	33.14*	31.89*	1.25*	Yes	Yes	1.2	1.2	2.0	1.9
			07/16/2015	32.69*	31.45*	1.24*	Yes	No	0.0	0.0	2.2	1.9
			07/24/2015	31.66*	30.50*	1.16*	Yes	No	0.0	0.0	2.0	1.8
07/27/2015	31.96*	30.55*	1.41*	Yes	No	0.0	0.0	2.5	2.2			
08/04/2015	33.03*	31.73*	1.30*	Yes	Yes	1.2	1.2	2.5	2.0			
08/14/2015	32.08*	29.53*	2.55*	Yes	No	0.5	0.5	4.5	4.0			
08/17/2015	33.03*	31.73*	1.04*	Yes	No	0.0	0.0	0.0	0.0			
08/21/2015	28.41	27.65	0.76	No	--	(Bubbler installed in well)		1.5	1.0			
08/29/2015	30.14	29.48	0.66	No	--	(Bubbler installed in well)		1.3	1.0			
09/03/2015	30.52	29.86	0.66	No	--	(Bubbler installed in well)		1.3	1.0			
09/10/2015	31.67	30.53	1.14	No	--	(Bubbler installed in well)		2.0	1.7			
09/21/2015	32.58	30.77	1.81	No	--	(Bubbler installed in well)		3.0	2.3			
<b>Total Gallons Removed =</b>									<b>17.3</b>	<b>13.7</b>	<b>75.6</b>	<b>47.8</b>
MW-2R	4	15-45	01/02/2015	31.44	31.33	0.1	No	--	--	--	0.5	0.2
			06/01/2015	31.59	31.33	Trace	No	--	--	--	0.0	0.0
			06/23/2015	30.24	ND	ND	No	--	--	--	0.0	0.0
			07/27/2015	32.86	31.62	1.24	No	--	--	--	2.0	1.3
			<b>Total Gallons Removed =</b>									<b>0.0</b>

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
MW-3A	4	10-45	01/02/2015	30.72	30.43	0.29**	No	--	--	--	1.0	0.5
			01/09/2015	30.61	30.14	0.47	No	--	--	--	1.0	0.8
			01/17/2015	30.69	29.29	0.87	No	--	--	--	1.5	1.4
			01/23/2015	30.65	29.95	0.70	No	--	--	--	1.5	1.1
			01/29/2015	30.53	29.91	0.65	No	--	--	--	2.0	1.0
			01/30/2015	30.16	30.14	0.02	(Installed on 1/30/15)				0.1	<0.1
			02/05/2015	30.95*	30.69*	0.26*	Yes	No	0.3	0.3	1.5	0.4
			02/13/2015	30.57*	30.56*	0.01*	Yes	No	0.3	0.3	0.0	0.0
			02/20/2015	31.04*	30.56*	0.01*	Yes	No	0.3	0.3	0.0	0.0
			02/26/2015	31.02*	30.34*	0.48*	Yes	No	0.2	0.2	2.0	0.7
			03/09/2015	31.00*	30.89*	0.11*	Yes	No	0.2	0.2	1.0	0.2
			03/16/2015	31.22*	30.65*	0.57*	Yes	No	0.4	0.4	1.5	0.9
			03/23/2015	32.32*	31.64*	0.68*	Yes	No	0.4	0.4	1.0	0.8
			04/03/2015	31.09*	30.71*	0.38*	Yes	No	0.3	0.3	1.0	0.6
			04/14/2015	30.59*	30.57*	0.02*	Yes	No	1.3	1.3	0.3	0.1
			04/21/2015	30.70*	30.68*	0.02*	Yes	No	0.6	0.6	0.1	<0.1
			05/06/2015	31.29*	30.55*	0.74*	Yes	Yes	2.2	2.2	1.5	0.2
			05/11/2015	30.66*	30.64*	0.02*	Yes	No	0.5	0.5	0.0	0.0
			05/19/2015	31.28*	30.70*	0.58*	Yes	Yes	2.2	2.2	3.0	0.9
			05/30/2015	31.44	30.22	1.22	(Skimmer removed on 5-19-15 for eyehook retrofit)				2.0	1.9
			06/05/2015	31.55	31.43	0.12	(Retro-fitted skimmer installed on 6-5-15)				0.5	0.2
			06/10/2015	31.03*	30.87*	0.16*	Yes	Yes	2.2	2.2	1.0	0.3
			06/17/2015	30.98*	30.76*	0.22*	Yes	No	1.2	1.2	0.5	0.3
			06/23/2015	30.94*	30.93*	0.01*	Yes	Yes	2.2	2.2	--	--
			07/01/2015	31.14*	30.81*	0.33*	Yes	Yes	2.2	2.2	0.8	0.5
			07/06/2015	31.07*	31.06*	0.33*	Yes	Yes	2.2	2.2	0.8	0.5
			07/16/2015	31.31*	30.93*	0.38*	Yes	Yes	2.2	2.2	1.0	0.6
			07/24/2015	31.27*	30.98*	0.29*	Yes	Yes	2.2	2.2	0.5	0.4
			07/27/2015	31.03*	30.02*	0.01*	Yes	Yes	2.2	2.2	--	--
			08/04/2015	31.14*	30.81*	0.33*	Yes	Yes	2.2	2.2	0.8	0.5
08/14/2015	31.36*	31.22*	0.14*	Yes	No	0.5	0.5	0.5	0.2			
08/21/2015	32.22*	31.09*	1.13*	Yes	Yes	2.2	2.2	2.0	1.7			
08/29/2015	32.16*	31.11*	1.05*	Yes	No	0	0.0	2.0	1.6			
09/03/2015	32.40*	31.35*	1.05*	Yes	No	0.1	0.1	2.0	1.5			
09/10/2015	32.28*	31.02*	1.26*	Yes	Yes	2.2	2.2	2.2	1.9			
09/21/2015	32.48	31.11	1.37	No	--	(Bubbler installed in well)		2.5	2.1			
<b>Total Gallons Removed =</b>									<b>32.7</b>	<b>32.7</b>	<b>38.9</b>	<b>23.5</b>
MW-6	2	10-45	02/05/2015	28.69	ND	ND	No	--	--	--	--	--
			03/16/2015	28.72	ND	ND	No	--	--	--	--	--
			06/01/2015	29.02	ND	ND	No	--	--	--	--	--
			06/23/2015	29.02	ND	ND	No	--	--	--	--	--
			07/27/2015	29.23	ND	ND	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
MW-8	2	10-40	02/05/2015	28.04	ND	ND	No	--	--	--	--	--
			03/16/2015	28.06	ND	ND	No	--	--	--	--	--
			06/01/2015	28.38	ND	ND	No	--	--	--	--	--
			06/23/2015	28.38	ND	ND	No	--	--	--	--	--
			07/27/2015	28.31	ND	ND	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
MW-9	2	10-35	04/14/2015	28.17	ND	ND	No	--	--	--	--	--
			06/01/2015	28.39	ND	ND	No	--	--	--	--	--
			06/23/2015	28.36	ND	ND	No	--	--	--	--	--
			07/27/2015	28.62	ND	ND	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
MW-10	2	15-45	04/14/2015	22.92	ND	ND	No	--	--	--	--	--
			06/01/2015	28.01	ND	ND	No	--	--	--	--	--
			06/23/2015	23.10	ND	ND	No	--	--	--	--	--
			07/27/2015	23.33	ND	ND	No	--	--	--	--	--
			<b>Total Gallons Removed =</b>									<b>0.0</b>
MW-15	2	10-45	05/02/2015	30.83*	28.80*	2.03*	Yes	Yes	0.1	0.1	2.0	1.0
			05/16/2015	30.97	28.86	2.11	No	No	--	--	2.5	1.5
			05/30/2015	30.98	28.91	2.07	No	No	--	--	1.5	1.4
			06/13/2015	31.07	28.97	2.10	No	No	--	--	2.0	1.5
			06/27/2015	31.13	29.03	2.10	No	No	--	--	2.2	1.5
			07/11/2015	31.19	29.08	2.11	No	No	--	--	1.8	1.5
			07/27/2015	31.26	29.14	2.12	No	No	--	--	2.0	1.5
			08/29/2015	31.41	29.29	2.12	No	No	--	--	2.0	1.5
			<b>Total Gallons Removed =</b>									<b>0.1</b>
MW-16	2	10-35	05/02/2015	26.77*	25.12*	1.65*	Yes	Yes	0.43	0.43	1.5	0.8
			05/16/2015	26.82*	25.20*	1.62*	Yes	Yes	0.25	0.25	2.0	1.1
			05/30/2015	26.81*	25.28*	1.53*	Yes	Yes	0.25	0.25	1.5	1.1
			06/13/2015	26.86*	25.33*	1.53*	Yes	Yes	0.25	0.25	1.5	1.1
			06/27/2015	26.92*	25.38*	1.54*	Yes	Yes	0.25	0.25	1.6	1.1
			07/11/2015	27.01*	25.51*	1.50*	Yes	Yes	0.25	0.25	1.3	1.0
			07/27/2015	26.96*	25.55*	1.41*	Yes	No	0.00	0.00	1.3	1.0
			08/29/2015	27.19*	25.66*	1.53*	Yes	Yes	0.25	0.25	1.3	1.0
			<b>Total Gallons Removed =</b>									<b>1.93</b>
MW-17	2	10-45	01/17/2015	23.72*	22.96*	0.76*	Yes	No	0.0	0.0	1.5	0.5
			01/23/2015	23.21*	23.11*	0.10*	Yes	No	0.3	0.3	0.5	0.1
			01/30/2015	23.13*	ND*	ND*	Yes	No	0.1	0.1	0.0	0.0
			02/05/2015	23.17*	ND*	ND*	Yes	No	0.1	0.1	0.0	0.0
			02/13/2015	23.24*	23.17*	0.07*	Yes	Yes	0.3	0.3	0.3	0.1
			02/20/2015	23.18*	23.16*	0.02*	Yes	Yes	0.3	0.3	0.0	0.0
			02/26/2015	23.13*	23.12*	0.01*	Yes	Yes	0.3	0.3	0.0	0.0
			03/09/2015	23.12*	23.11*	0.01*	Yes	Yes	0.3	0.3	0.0	0.0
			03/16/2015	23.09*	23.05*	0.04*	Yes	Yes	0.3	0.3	0.3	0.1
			03/23/2015	23.84*	23.12*	0.72*	Yes	Yes	0.3	0.3	1.0	0.5
			04/03/2015	23.66*	23.16*	0.40*	Yes	Yes	0.3	0.3	1.0	0.6
			04/14/2015	24.21*	23.09*	1.12*	Yes	Yes	0.3	0.3	0.0	0.0
			04/21/2015	23.18*	23.17*	0.01*	Yes	Yes	0.4	0.4	0.0	0.0
			05/06/2015	23.17*	23.16*	0.01*	Yes	Yes	0.4	0.4	0.1	<0.1
			05/11/2015	23.18*	23.17*	0.01*	Yes	No	0.2	0.2	0.0	0.0
			05/30/2015	24.35*	23.24*	1.11*	Yes	Yes	0.4	0.4	0.8	0.8
			06/05/2015	24.20*	23.31*	0.89*	Yes	Yes	0.4	0.4	1.0	0.6
			06/10/2015	24.49*	23.35*	1.14*	Yes	No	0.0	0.0	1.0	0.8
			06/17/2015	24.47*	23.32*	1.15*	Yes	Yes	0.4	0.4	1.0	0.8
			06/23/2015	24.38*	23.34*	1.04*	Yes	Yes	0.4	0.4	0.0	0.0
			07/01/2015	28.55*	28.04*	0.51*	Yes	Yes	0.4	0.4	0.5	0.4
			07/06/2015	24.33*	23.47*	0.86*	Yes	Yes	0.4	0.4	0.8	0.6
			07/16/2015	24.49*	23.51*	0.98*	Yes	Yes	0.4	0.4	1.0	0.7
			07/24/2015	24.51*	23.50*	1.01*	Yes	Yes	0.4	0.4	1.0	0.7
			07/27/2015	24.55*	23.54*	1.01*	Yes	Yes	0.4	0.4	2.0	1.6
08/04/2015	28.55*	28.04*	0.51*	Yes	Yes	0.4	0.4	0.5	0.4			
08/14/2015	24.66*	23.62*	1.04*	Yes	Yes	0.4	0.4	1.0	0.7			
08/21/2015	24.76*	23.62*	1.14*	Yes	Yes	0.4	0.4	1.0	0.8			
08/29/2015	24.77*	23.69*	1.08*	Yes	Yes	0.4	0.4	1.0	0.8			
09/03/2015	24.77*	23.79*	0.8*	Yes	No	0.3	0.3	1.0	0.7			
09/10/2015	24.79*	23.78*	1.01*	Yes	No	0.3	0.3	1.0	0.7			
09/21/2015	24.78*	23.80*	0.98*	Yes	Yes	0.4	0.4	1.0	0.7			
<b>Total Gallons Removed =</b>									<b>10.1</b>	<b>10.1</b>	<b>20.2</b>	<b>13.5</b>

TABLE 5  
SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA  
(ON AND AFTER JANUARY 2, 2015)  
RAPID GAS #37  
6020 ARLINGTON AVENUE  
RIVERSIDE, CALIFORNIA

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information		
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)	
MW-19	2	10-45	02/05/2015	28.28	ND	ND	No	--	--	--	--	--	
			03/16/2015	28.28	ND	ND	No	--	--	--	--	--	
			06/01/2015	28.61	ND	ND	No	--	--	--	--	--	
			06/23/2015	28.60	ND	ND	No	--	--	--	--	--	
			07/27/2015	28.84	ND	ND	No	--	--	--	--	--	
			<b>Total Gallons Removed =</b>										0.0
MW-20	2	10-45	01/02/2015	28.55	ND	ND**	No	--	--	--	--	--	
			02/05/2015	28.46	ND	ND	No	--	--	--	--	--	
			03/16/2015	28.48	ND	ND	No	--	--	--	--	--	
			06/01/2015	28.81	ND	ND	No	--	--	--	--	--	
			06/23/2015	28.90	ND	ND	No	--	--	--	--	--	
			07/27/2015	29.02	ND	ND	No	--	--	--	--	--	
<b>Total Gallons Removed =</b>										0.0	0.0	0.0	0.0
MW-21	4	16-36	04/14/2015	23.16	ND	ND	No	--	--	--	--	--	
			06/01/2015	23.16	ND	ND	No	--	--	--	--	--	
			06/23/2015	23.34	ND	ND	No	--	--	--	--	--	
			07/27/2015	23.53	ND	ND	No	--	--	--	--	--	
<b>Total Gallons Removed =</b>										0.0	0.0	0.0	0.0
MW-23	4	21.5-41.5	02/05/2015	27.36	ND	ND	No	--	--	--	--	--	
			03/16/2015	27.08	ND	ND	No	--	--	--	--	--	
			06/01/2015	27.08	ND	ND	No	--	--	--	--	--	
			06/23/2015	27.70	ND	ND	No	--	--	--	--	--	
			07/27/2015	27.91	ND	ND	No	--	--	--	--	--	
<b>Total Gallons Removed =</b>										0.0	0.0	0.0	0.0

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information		
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)	
RW-1A	4	10-35	01/02/2015	31.76	31.66	0.10**	No	--	--	--	0.5	0.1	
			01/09/2015	32.26	31.75	0.51	No	--	--	--	1.0	0.8	
			01/17/2015	32.38	31.16	1.22	No	--	--	--	2.5	1.9	
			01/23/2015	32.50	31.11	1.39	No	--	--	--	2.5	2.2	
			01/29/2015	32.52	31.06	1.46			(Installed on 1/29/15)			3.0	2.3
			01/30/2015	33.42*	32.13*	1.29*	Yes		(not working, too long, remove)			2.5	2.0
			02/05/2015	32.68	31.08	1.60			(Shorter skimmer installed on 2/5/15)			4.0	2.5
			02/13/2015	33.01*	31.60*	1.41*	Yes	Yes	0.5	0.5		3.5	2.2
			02/20/2015	33.30*	31.97*	1.33*	Yes	Yes	0.5	0.5		3.5	2.1
			02/26/2015	33.29*	31.82*	1.47*	Yes	Yes	0.5	0.5		3.5	2.3
			03/09/2015				Yes	Yes	0.5	0.5		--	--
			03/16/2015	33.06*	31.31*	1.75*			(auto skimmer installed/not working, removed it to bail)			3.0	2.7
			03/20/2015	32.24*	31.62*	0.62*	Yes-AS	--	14	14		--	--
			03/23/2015	32.16*	31.68*	0.48*	Yes-AS	--	28	14		--	--
			04/03/2015		(Did not measure)				(auto skimmer turned off to empty and repair holding tank)			--	--
			04/14/2015	31.94*	31.77*	0.17*	Yes-AS	--	14	13		--	--
			04/21/2015	32.71	31.29	1.42			(auto skimmer removed for replacement of blown valve)			3.0	2.2
			05/06/2015	33.05	31.34	1.71			(auto skimmer removed for replacement of blown valve)			4.0	2.7
			05/11/2015	33.14	31.29	1.85			(auto skimmer removed for replacement of blown valve)			3.0	2.9
			05/14/2015		(Did not measure)				(auto skimmer replaced on 5/14/15)			--	--
			05/19/2015	32.21*	31.6*	0.61*	Yes-AS	--	20	15		--	--
			05/21/2015		(Did not measure)		Yes-AS	--	18	13		--	--
			05/30/2015	33.16*	31.62*	1.54*	Yes-AS**	--	14	11		--	--
			06/05/2015	32.04*	31.71*	0.33*	Yes-AS	--	41	20		--	--
			06/10/2015	32.80*	31.58*	1.12*	Yes-AS	--	--	--		2.0	1.7
			06/17/2015	33.30*	31.41*	1.89*	Yes-AS	--	12	9		3.0	2.9
			06/23/2015	33.39*	31.41*	1.98*	Yes-AS	--	--	--		3.0	2.8
			07/01/2015	32.64*	31.93*	0.71*	Yes-AS	--	10	7.5		1.5	1.1
			07/06/2015	32.81*	31.61*	1.20*	Yes-AS	--	11	7.5		2.0	1.8
			07/16/2015	32.69*	31.45*	1.24*	Yes-AS	--	29	22		2.3	1.9
			07/24/2015	32.32*	32.18*	0.14*	Yes-AS	--	24	21		0.5	0.2
			07/27/2015	32.28*	32.18*	0.10*	Yes-AS	--	9	7		0.5	0.2
08/04/2015	32.27*	31.02*	0.25*	Yes-AS	--	19	14		--	--			
08/14/2015	33.61*	31.10*	2.51*	Yes-AS	--			(product volumes not checked)	--	--			
08/17/2015	28.01*	27.44*	0.57*	Yes-AS	--	26	20		--	--			
08/21/2015	32.71*	30.20*	2.51*			(auto skimmer system malfunction; re-start)			--	--			
08/29/2015	33.03*	31.54*	1.49*	Yes-AS	--	14	11		--	--			
09/03/2015	31.58*			Yes-AS	--	10	8		--	--			
09/10/2015	32.98*	31.65*	1.33*	Yes-AS	--	28	21		--	--			
09/21/2015	33.71*	31.79*	1.92*	Yes-AS	--	21	15		--	--			
09/28/2015		(Not measured)		Yes-AS	--	24	18		--	--			
						<b>Total Gallons Removed =</b>			<b>388.0</b>	<b>283.0</b>	<b>54.3</b>	<b>41.3</b>	
RW-2	4	10-35	02/05/2015	31.35	31.33	0.02	No	--	--	--	0.1	<0.1	
			03/16/2015	29.86	29.80	0.06	No	--	--	--	0.5	0.1	
			06/01/2015	30.21	30.13	0.08	No	--	--	--	0.5	0.1	
			06/23/2015	30.24	30.21	0.03	No	--	--	--	--	--	
			07/27/2015	30.41	30.35	0.06	No	--	--	--	--	--	
									<b>Total Gallons Removed =</b>			<b>0.0</b>	<b>0.0</b>

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
RW-3R	4	10-35	01/02/2015	30.78	30.74	0.04**	No	--	--	--	0.3	0.1
			01/09/2015	30.61	30.60	0.01	No	--	--	--	0.3	<0.1
			01/17/2015	30.62	30.60	0.02	No	--	--	--	0.3	<0.1
			01/23/2015	30.60	30.57	0.03	No	--	--	--	0.2	0.1
			01/29/2015	30.27	30.25	0.02	No	--	--	--	0.1	<0.1
			02/05/2015	30.63	30.59	0.04	No	--	--	--	0.1	0.1
			02/13/2015	30.63	30.59	0.04	No	--	--	--	0.1	0.1
			02/20/2015	30.88	30.55	0.33	No	--	--	--	1.0	0.5
			02/26/2015	30.55	30.57	0.02	No	--	--	--	0.5	<0.1
			03/09/2015	30.59	30.58	0.01	No	--	--	--	0.1	<0.1
			03/16/2015	31.12	30.53	0.59	No	--	--	--	1.0	0.9
			03/23/2015	31.64	30.87	0.77	No	--	--	--	1.5	1.2
			04/03/2015	31.09	30.68	0.41	No	--	--	--	1.0	0.6
			04/14/2015	31.28	30.68	0.60	No	--	--	--	1.0	0.3
			04/21/2015	30.75	30.73	0.02	No	--	--	--	0.2	<0.1
			05/06/2015	30.75	30.73	0.02	No	--	--	--	0.2	<0.1
			05/11/2015	31.01*	31.01*	Trace*	Yes	No	0.1	0.1	0.0	0.0
			05/19/2015	31.36*	31.09*	0.27*	Yes	No	0.1	Trace	2.0	0.4
			05/30/2015	31.01	30.89	0.12	(Skimmer removed on 5-19-15 for eyehook retrofit)				0.3	0.2
			06/05/2015	31.55	31.43	0.12	(Retrofitted skimmer installed on 6-5-15)				0.5	0.2
			06/10/2015	31.74*	31.28*	0.46*	Yes	No	0.0	0.0	1.0	0.7
			06/17/2015	32.12*	31.47*	0.65*	Yes	Yes	0.5	0.5	1.5	1.0
			06/23/2015	32.15*	31.53*	0.62*	Yes	Yes	0.5	0.1	1.5	1.0
			07/01/2015	32.23*	31.34*	0.89*	Yes	Yes	0.5	0.0	1.5	1.4
			07/06/2015	32.18*	31.61*	0.57*	Yes	Yes	0.5	0.1	1.0	0.9
			07/16/2015	31.95*	30.93*	1.02*	No	--	--	--	2.0	1.6
			07/24/2015	31.09*	30.90*	0.19*	No	--	--	--	0.5	0.3
			07/27/2015	31.09*	30.94*	0.15*	No	--	--	--	0.5	0.2
			08/04/2015	32.23*	31.34*	0.89*	Yes	Yes	0.5	0.0	1.5	1.4
			08/14/2015	31.54	30.56	0.98*	No	--	--	--	1.8	1.5
			08/21/2015	32.09	30.98	1.11	No	--	--	--	2.0	1.7
			08/29/2015	32.13	31.03	1.10	No	--	--	--	2.0	1.7
09/03/2015	32.15	31.08	1.07	No	--	--	--	2.0	1.7			
09/10/2015	32.20	31.09	1.11	No	--	--	--	2.0	1.7			
09/21/2015	32.47	31.07	1.40	No	--	--	--	2.5	2.2			
<b>Total Gallons Removed =</b>									<b>2.7</b>	<b>0.8</b>	<b>33.8</b>	<b>23.4</b>

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
RW-4	4	10-35	01/02/2015	31.90	30.70	1.20**	No	--	--	--	3.0	1.5
			01/09/2015	31.65	30.84	0.81	No	--	--	--	1.5	1.3
			01/17/2015	31.68	30.59	1.09	No	--	--	--	4.0	1.7
			01/23/2015	31.65	30.56	1.09	No	--	--	--	2.0	1.7
			01/29/2015	32.52	31.06	1.46			(Installed on 1/29/15)		3.0	2.3
			01/30/2015	31.04*	30.67*	0.37*	Yes	No	(not working, bad valve, repair)		1.0	0.6
			02/05/2015	31.42*	30.96*	0.46*	Yes	No	0.4	0.40	1.5	0.7
			02/13/2015	31.56	30.42	0.14			(Moved skimmer to RW1-A on 2/5/15)		5.0	0.2
			02/20/2015	31.61	30.39	1.22	No	--	--	--	5.0	0.2
			02/26/2015	31.52	30.34	1.18	No	--	--	--	3.0	1.8
			03/09/2015	31.48	30.33	0.15	No	--	--	--	2.0	0.2
			03/16/2015	31.72	30.41	1.31	No	--	--	--	2.5	2.0
			03/23/2015	31.82	30.48	1.34	No	--	--	--	4.0	2.1
			04/03/2015	31.89	30.50	1.39	No	--	--	--	2.5	2.2
			04/14/2015	31.99	30.53	1.46	No	--	--	--	3.0	1.0
			04/21/2015	31.98	30.54	1.44	No	--	--	--	2.5	2.2
			05/11/2015	32.07	30.57	1.50	No	--	--	--	3.0	2.3
			05/19/2015	32.19	30.66	1.53	No	--	--	--	5.0	2.4
			05/30/2015	32.20	30.66	1.54	No	--	--	--	3.0	2.4
			06/05/2015	--	--	--			(auto skimmer installed on 6-5-15)		--	--
			06/10/2015	31.32*	31.06*	0.26*	Yes-AS	--	--	--	1.0	0.4
			06/17/2015	31.27*	31.07*	0.20*	Yes-AS	--	8	6	0.5	0.3
			06/23/2015	31.29*	31.14*	0.15*	Yes-AS	--	--	--	0.5	0.2
			07/01/2015	31.17*	31.14*	0.03*	Yes-AS	--	7	5.3	0.3	0.1
			07/06/2015	31.33*	31.11*	0.22*	Yes-AS	--	4	3	0.5	0.3
			07/16/2015	31.37*	31.14*	0.23*	Yes-AS	--	7	5.3	0.8	0.4
			07/24/2015	31.30*	31.22*	0.08*	Yes-AS	--	10	9	0.3	0.1
			07/27/2015	31.46*	31.18*	0.28*	Yes-AS	--	4	3	0.7	0.4
			08/04/2015	31.57*	31.28*	0.29*	Yes-AS	--	8	6	--	--
			08/14/2015	30.07*	29.91*	0.16*	Yes-AS	--	(product volumes not checked)	--	--	--
			08/17/2015	28.61*	28.42*	0.19*	Yes-AS	--	12	9	--	--
			08/21/2015	30.26*	28.21*	2.05*			(auto skimmer system malfunction; re-start)	--	--	--
			08/29/2015	31.94*	30.90*	1.04*	Yes-AS	--	6	5	--	--
09/03/2015	31.08*	30.61*	0.47*	Yes-AS	--	4	3	--	--			
09/10/2015	32.93*	30.45*	2.48*	Yes-AS	--	12	9	--	--			
09/21/2015	32.68*	31.07*	1.61*	Yes-AS	--	9	7	--	--			
09/28/2015			(Not measured)	Yes-AS	--	9	7	--	--			
<b>Total Gallons Removed =</b>								<b>100.4</b>	<b>78.0</b>	<b>61.1</b>	<b>30.9</b>	

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
RW-5	4	10-35	01/02/2015	31.83	31.63	0.20**	No	--	--	--	1.0	0.3
			01/09/2015	31.40	31.34	0.06	No	--	--	--	0.5	0.1
			01/17/2015	31.48	31.14	0.34	No	--	--	--	2.0	0.5
			01/23/2015	31.48	31.14	0.34	No	--	--	--	1.5	0.5
			01/30/2015	31.46	31.20	0.26	No	--	--	--	1.0	0.4
			02/05/2015	31.67	31.07	0.60	No	--	--	--	1.5	0.9
			02/13/2015	31.75	31.05	0.70	No	--	--	--	4.0	1.1
			02/20/2015	31.94	31.02	0.92	No	--	--	--	4.0	1.4
			02/26/2015	31.79	30.98	0.81	No	--	--	--	2.5	1.2
			03/09/2015	31.86	30.97	0.89	(Install skimmer on 3/9/15)				1.5	1.4
			03/16/2015	32.72*	31.71*	1.02*	Yes	Yes	0.5	0.5	3.0	1.6
			03/23/2015	32.53*	31.69*	0.84*	Yes	Yes	0.5	0.5	2.0	1.3
			04/03/2015	32.63*	31.73*	0.90*	Yes	Yes	0.5	0.5	2.0	1.4
			04/14/2015	32.76*	31.65*	1.11*	Yes	Yes	0.5	0.5	2.0	1.5
			04/21/2015	32.59*	31.76*	0.83*	Yes	Yes	0.5	0.1	1.5	1.3
			05/11/2015	31.93*	31.92*	0.01*	Yes	No	0.1	0.1	0.0	0.0
			05/19/2015	32.47*	31.90*	0.57*	Yes	Yes	0.5	Trace	1.0	0.9
			05/30/2015	31.94	31.43	0.51	(Skimmer removed on 5-19-15 for eyehook retrofit)				1.5	0.8
			06/05/2015	31.91	31.47	0.44	No	--	--	--	1.0	0.7
			06/10/2015	31.82	31.56	0.26	(Install retrofitted skimmer on 6/10/15)				1.0	0.4
			06/17/2015	32.27*	32.24*	0.03*	Yes	Yes	0.5	0.5	0.1	0.1
			06/23/2015	32.27*	32.26*	0.01*	Yes	No	0.2	0.2	--	--
			07/01/2015	32.32*	--*	trace*	Yes	No	0.1	0.1	--	--
			07/06/2015	32.32*	--*	trace*	Yes	No	0.1	0.1	--	--
			07/16/2015	32.28*	--*	trace*	Yes	No	0.1	0.1	--	--
			07/24/2015	32.39*	32.34*	0.05*	Yes	No	0.1	0.1	0.3	0.1
			07/27/2015	32.40*	32.39*	0.01*	Yes	No	0.1	0.1	--	--
			08/04/2015	32.32*	--*	trace*	Yes	No	0.1	0.1	--	--
			08/14/2015	31.84	--	trace	No	--	--	--	--	--
			08/21/2015	31.89	--	trace	No	--	--	--	--	--
08/29/2015	31.87	--	trace	No	--	--	--	--	--			
09/03/2015	31.97	--	trace	No	--	--	--	--	--			
09/10/2015	31.98	--	trace	No	--	--	--	--	--			
09/21/2015	31.98	--	trace	No	--	--	--	--	--			
<b>Total Gallons Removed =</b>									<b>4.4</b>	<b>3.5</b>	<b>34.9</b>	<b>17.8</b>
RW-6	4	10-35	01/02/2015	31.43	ND	ND**	No	--	--	--	--	--
			02/05/2015	31.31	ND	ND	No	--	--	--	--	--
			03/16/2015	31.82	ND	ND	No	--	--	--	--	--
			06/01/2015	28.67	ND	ND	No	--	--	--	--	--
			06/23/2015	31.65	ND	ND	No	--	--	--	--	--
			07/27/2015	31.83	--	trace	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
RW-7	4	10-35	02/05/2015	29.77	ND	ND	No	--	--	--	--	--
			06/01/2015	29.86	ND	ND	No	--	--	--	--	--
			06/23/2015	29.83	ND	ND	No	--	--	--	--	--
			07/27/2015	30.07	--	trace	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
RW-9	4	10-35	06/01/2015	27.37	ND	ND	No	--	--	--	--	--
			06/23/2015	27.41	ND	ND	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information		
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)	
RW-10	4	10-35	02/05/2015	27.67	ND	ND	No	--	--	--	--	--	
			03/16/2015	27.68	ND	ND	No	--	--	--	--	--	
			06/01/2015	28.01	ND	ND	No	--	--	--	--	--	
			06/23/2015	28.01	ND	ND	No	--	--	--	--	--	
			07/27/2015	28.23	ND	ND	No	--	--	--	--	--	
			<b>Total Gallons Removed =</b>										<b>0.0</b>
RW-11	4	10-35	02/05/2015	27.40	ND	ND	No	--	--	--	--	--	
			03/16/2015	27.42	ND	ND	No	--	--	--	--	--	
			06/01/2015	27.72	ND	ND	No	--	--	--	--	--	
			06/23/2015	27.75	ND	ND	No	--	--	--	--	--	
			07/27/2015	27.95	ND	ND	No	--	--	--	--	--	
			<b>Total Gallons Removed =</b>										<b>0.0</b>
RW-13	4	10-35	02/05/2015	28.71	ND	ND	No	--	--	--	--	--	
			03/16/2015	28.67	ND	ND	No	--	--	--	--	--	
			06/01/2015	28.97	ND	ND	No	--	--	--	--	--	
			06/23/2015	29.70	ND	ND	No	--	--	--	--	--	
			07/27/2015	29.19	ND	ND	No	--	--	--	--	--	
			<b>Total Gallons Removed =</b>										<b>0.0</b>
RW-14	4	10-45	01/02/2015	27.78	ND	ND**	No	--	--	--	--	--	
			02/05/2015	27.69	ND	ND	No	--	--	--	--	--	
			03/16/2015	27.62	27.61	0.01	No	--	--	--	--	--	
			06/01/2015	(No access - covered by car)			--	--	--	--	--	--	--
			06/05/2015	29.11	27.76	1.35	No	--	--	--	3.0	2.1	
			06/10/2015	28.59	27.92	0.67	No	--	--	--	1.5	1.0	
			06/17/2015	28.52	27.99	0.53	No	--	--	--	1.0	0.8	
			06/23/2015	28.48	28.03	0.45	No	--	--	--	1.5	0.7	
			07/01/2015	24.46	23.42	1.04	No	--	--	--	2.0	1.6	
			07/06/2015	24.50	28.11	0.39	No	--	--	--	1.0	0.6	
			07/16/2015	28.65	28.12	0.53	No	--	--	--	1.0	0.8	
			07/24/2015	28.66	28.15	0.51	No	--	--	--	1.0	0.8	
			07/27/2015	28.68	28.15	0.53	No	--	--	--	1.0	0.8	
			08/04/2015	24.46	23.42	1.04	No	--	--	--	2.0	1.6	
			08/14/2015	29.02	28.16	0.86	No	--	--	--	1.5	1.3	
			08/21/2015	29.02	28.31	0.71	No	--	--	--	1.5	1.1	
08/29/2015	29.00	28.24	0.76	No	--	--	--	1.5	1.2				
09/03/2015	28.91	28.41	0.50	No	--	--	--	1.0	0.8				
09/10/2015	28.92	28.34	0.58	No	--	--	--	1.3	0.9				
09/21/2015	28.90	28.43	0.47	No	--	--	--	1.0	0.7				
<b>Total Gallons Removed =</b>										<b>0.0</b>	<b>0.0</b>	<b>22.8</b>	<b>16.9</b>
EZ-6	4	10-35	05/02/2015	22.85*	22.82*	0.03*	Yes	No	0.1	0.1	0.1	0.1	
			05/16/2015	22.90*	22.89*	0.01*	Yes	No	0.0	0.0	0.1	<0.1	
			05/30/2015	22.97*	22.96*	0.01*	Yes	No	0.0	0.0	0.1	<0.1	
			06/13/2015	23.01	22.99	0.01	No	--	--	--	0.1	<0.1	
			06/27/2015	23.07	23.05	0.02	No	--	--	--	0.1	<0.1	
			07/11/2015	23.14	23.13	0.01	No	--	--	--	0.1	<0.1	
			08/29/2015	23.36	23.35	0.01	No	--	--	--	0.1	<0.1	
			<b>Total Gallons Removed =</b>										<b>0.1</b>
EZ-7	2		05/02/2015	(no product detected, water depth not recorded)			No	--	--	--	--	--	
			06/23/2015	21.30	ND	ND	No	--	--	--	--	--	
<b>Total Gallons Removed =</b>										<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

**TABLE 5**  
**SUMMARY OF RECENT WELL MONITORING AND FREE PRODUCT RECOVERY DATA**  
**(ON AND AFTER JANUARY 2, 2015)**  
**RAPID GAS #37**  
**6020 ARLINGTON AVENUE**  
**RIVERSIDE, CALIFORNIA**

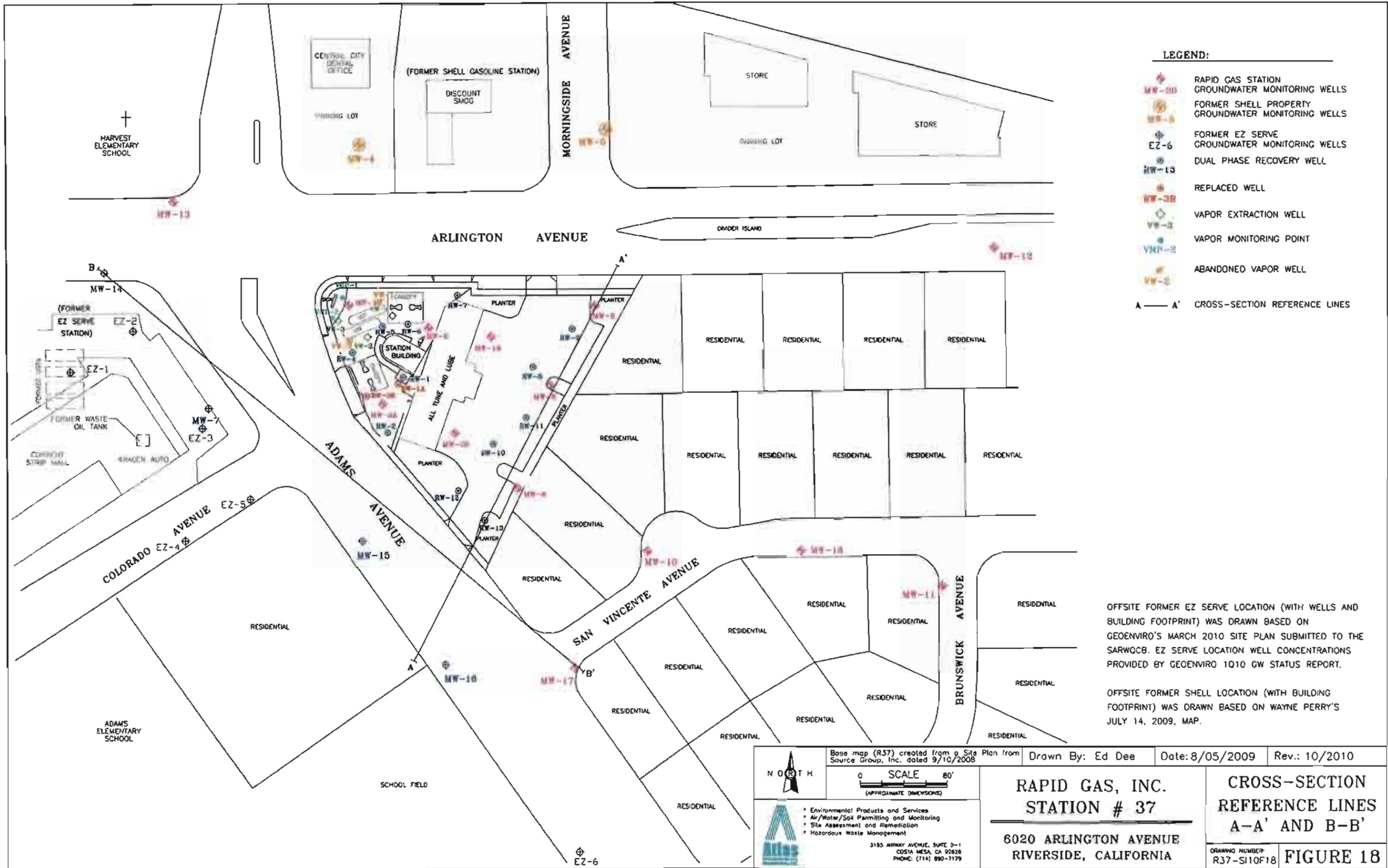
Well No.	Well Diameter (inches)	Well Screened Interval (feet bgs)	Date Monitored	Depth to Groundwater [1] (feet-btoc)	Depth to Free Product [1] (feet-btoc)	Free Product Thickness (feet)	Passive Skimmer Information				Manual Bailing Information	
							Passive or Auto Skimmer? (Yes/No)[2]	Passive Skimmer Full? (Yes/No)	Total Liquid Removed From Skimmer (gallons)	Free Product Removed From Skimmer (gallons)	Total liquid Removed (gallons)	Free Product Removed (gallons)
EZ-8	4	12-32	06/23/2015	22.73	ND	ND	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									0.0	0.0	0.0	0.0
EZ-9	4	14-34	06/23/2015	25.95	25.62	0.33	No	--	--	--	1.3	0.5
<b>Total Gallons Removed =</b>									0.0	0.0	<b>1.3</b>	<b>0.5</b>
EZ-10	4	14-34	06/23/2015	25.59	ND	ND	No	--	--	--	--	--
<b>Total Gallons Removed =</b>									0.0	0.0	0.0	0.0
EZ-12	4	15-45	05/02/2015	31.46*	29.91*	1.55*	Yes	Yes	0.5	0.5	3.0	2.4
			05/16/2015	31.41*	30.02*	1.39*	Yes	Yes	1.2	1.2	3.0	2.2
			05/30/2015	31.41*	30.07*	1.34*	Yes	Yes	1.2	1.2	2.2	2.0
			06/13/2015	31.51*	30.12*	1.39*	Yes	Yes	1.2	1.2	4.0	2.5
			06/27/2015	31.59*	30.19*	1.40*	Yes	Yes	1.2	1.2	4.0	2.4
			07/11/2015	31.57*	30.31*	1.26*	Yes	Yes	1.2	1.2	2.3	2.0
			07/27/2015	31.58*	30.41*	1.17*	Yes	No	0.0	0.0	2.0	1.8
			08/29/2015	31.84*	30.96*	0.88*	Yes	Yes	1.2	1.2	1.5	1.4
<b>Total Gallons Removed =</b>									<b>7.4</b>	<b>7.4</b>	<b>22.0</b>	<b>16.7</b>
EZ-13	4	10-35	05/02/2015	27.69*	27.68*	0.01*	Yes	No	1.2	0.0	0.1	<0.1
			05/16/2015	27.75*	27.74*	0.01*	Yes	No	0.1	0.1	0.1	<0.1
			05/30/2015	27.80*	27.80*	Trace	Yes	No	0.0	0.0	0.0	0.0
			06/13/2015	27.87*	27.85*	0.02*	Yes	No	0.0	0.0	0.3	<0.1
			06/27/2015	27.99*	27.90*	0.09*	Yes	No	0.0	0.0	0.3	0.1
			07/11/2015	28.13*	28.06*	0.07*	Yes	No	1.0	0.2	0.3	0.1
			07/27/2015	28.43*	28.11*	0.32*	Yes	No	0.0	0.0	1.0	0.5
			08/29/2015	28.97*	28.01*	0.96*	Yes	No	1.2	Trace	2.0	1.5
<b>Total Gallons Removed =</b>									<b>3.4</b>	<b>0.3</b>	<b>4.0</b>	<b>2.1</b>
EZ-14	4	10-35	05/02/2015	24.59*	23.36*	1.23*	Yes	No	1.2	0.3	2.5	1.9
			05/16/2015	24.44*	23.48*	0.96*	Yes	No	0.0	0.0	1.5	1.5
			05/30/2015	24.47*	23.55*	0.92*	Yes	Yes	1.2	1.2	2.0	1.4
			06/13/2015	24.50*	23.61*	0.89*	Yes	Yes	1.2	1.2	2.0	1.4
			06/27/2015	24.53*	23.68*	0.85*	Yes	Yes	1.2	1.2	2.0	1.4
			07/11/2015	24.61*	23.88*	0.73*	Yes	Yes	1.2	1.2	1.5	1.1
			08/29/2015	24.74*	23.97*	0.77*	Yes	Yes	1.2	1.2	0.8	0.5
<b>Total Gallons Removed =</b>									<b>6.9</b>	<b>6.1</b>	<b>12.3</b>	<b>9.1</b>
<b>GRAND TOTALS =</b>									<b>575.4</b>	<b>437.6</b>	<b>413.3</b>	<b>264.5</b>

**Notes:**

- [1] Depth to groundwater and free product measured from the top of well casing using a Solinst interface probe unless otherwise indicated.
- [2] Auto skimmer indicated by "AS."
- \* For passive skimmer, indicates measurement taken after passive skimmer was removed from well. For auto skimmer, indicates measurement taken with auto skimmer in well.
- \*\* Indicates a clear bailer was used to estimate free product thicknesses (interface probe was not working).
- \*\*\* Auto skimmer was off on arrival, trouble-shooting was conducted, and auto skimmer was re-started during same site visit.
- Not measured, not removed, or not applicable
- Trace Free product thickness less than a measurable thickness
- ND Not Detected

**APPENDIX E**

**GEOLOGIC CROSS SECTIONS PREPARED BY ATLAS**



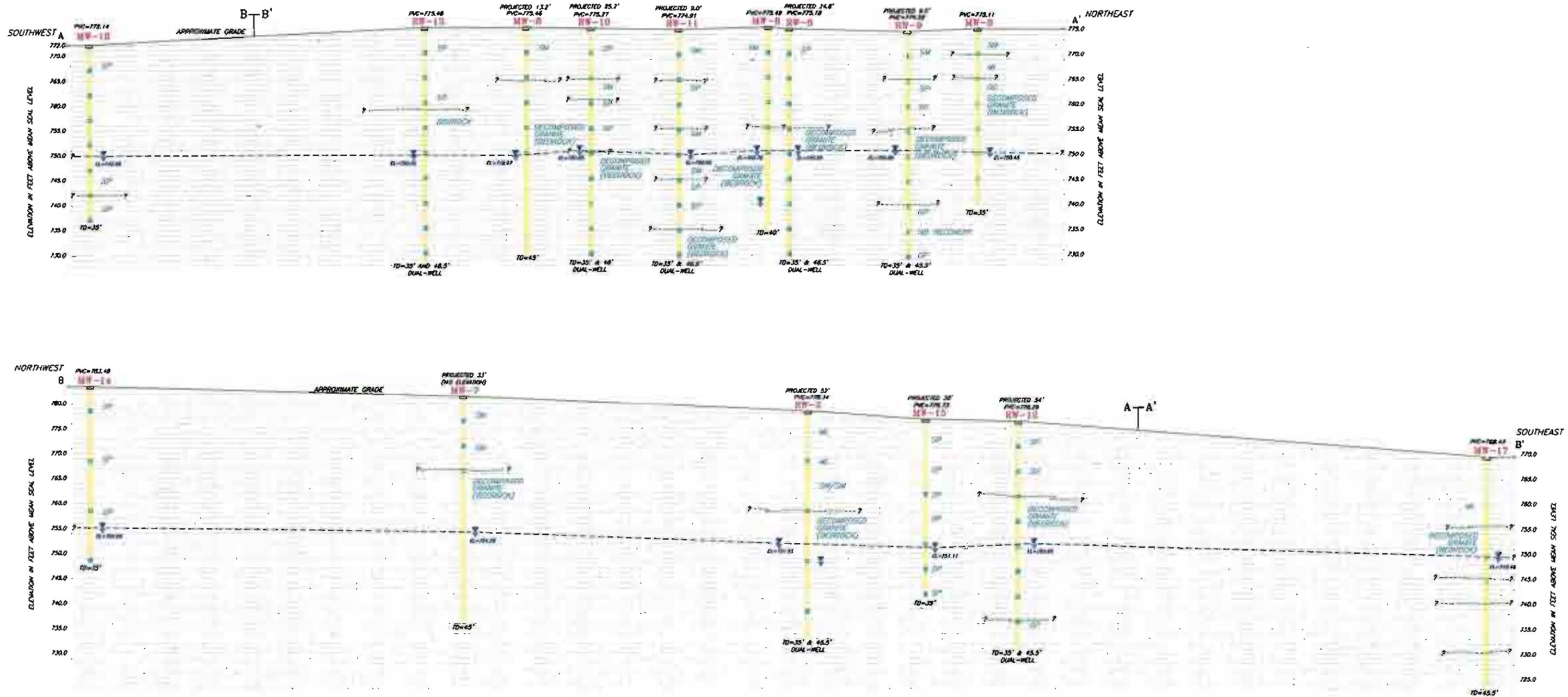
**LEGEND:**

-  MW-18 RAPID GAS STATION GROUNDWATER MONITORING WELLS
-  MW-1 FORMER SHELL PROPERTY GROUNDWATER MONITORING WELLS
-  EZ-6 FORMER EZ SERVE GROUNDWATER MONITORING WELLS
-  RW-13 DUAL PHASE RECOVERY WELL
-  MW-2R REPLACED WELL
-  VW-3 VAPOR EXTRACTION WELL
-  VMP-3 VAPOR MONITORING POINT
-  VW-5 ABANDONED VAPOR WELL
-  A — A' CROSS-SECTION REFERENCE LINES

OFFSITE FORMER EZ SERVE LOCATION (WITH WELLS AND BUILDING FOOTPRINT) WAS DRAWN BASED ON GEOENVIRO'S MARCH 2010 SITE PLAN SUBMITTED TO THE SARWQCB. EZ SERVE LOCATION WELL CONCENTRATIONS PROVIDED BY GEOENVIRO 1010 GW STATUS REPORT.

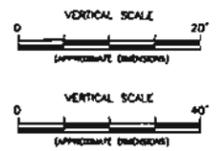
OFFSITE FORMER SHELL LOCATION (WITH BUILDING FOOTPRINT) WAS DRAWN BASED ON WAYNE PERRY'S JULY 14, 2009, MAP.

 NORTH	Base map (R37) created from a Site Plan from Source Group, Inc. dated 9/10/2008	Drawn By: Ed Dee	Date: 8/05/2009	Rev.: 10/2010
 SCALE 80' (APPROXIMATE DIMENSIONS)	<h2 style="margin: 0;">RAPID GAS, INC.</h2> <h3 style="margin: 0;">STATION # 37</h3>			
 <ul style="list-style-type: none"> <li>• Environmental Products and Services</li> <li>• Air/Water/Soil Permitting and Monitoring</li> <li>• Site Assessment and Remediation</li> <li>• Hazardous Waste Management</li> </ul>		6020 ARLINGTON AVENUE RIVERSIDE, CALIFORNIA		<h3 style="margin: 0;">CROSS-SECTION REFERENCE LINES A-A' AND B-B'</h3>
3185 ARWAY AVENUE, SUITE D-1 COSTA MESA, CA 92626 PHONE: (714) 890-3129		DRAWING NUMBER: R37-SI10F18		<b>FIGURE 18</b>



**LEGEND:**

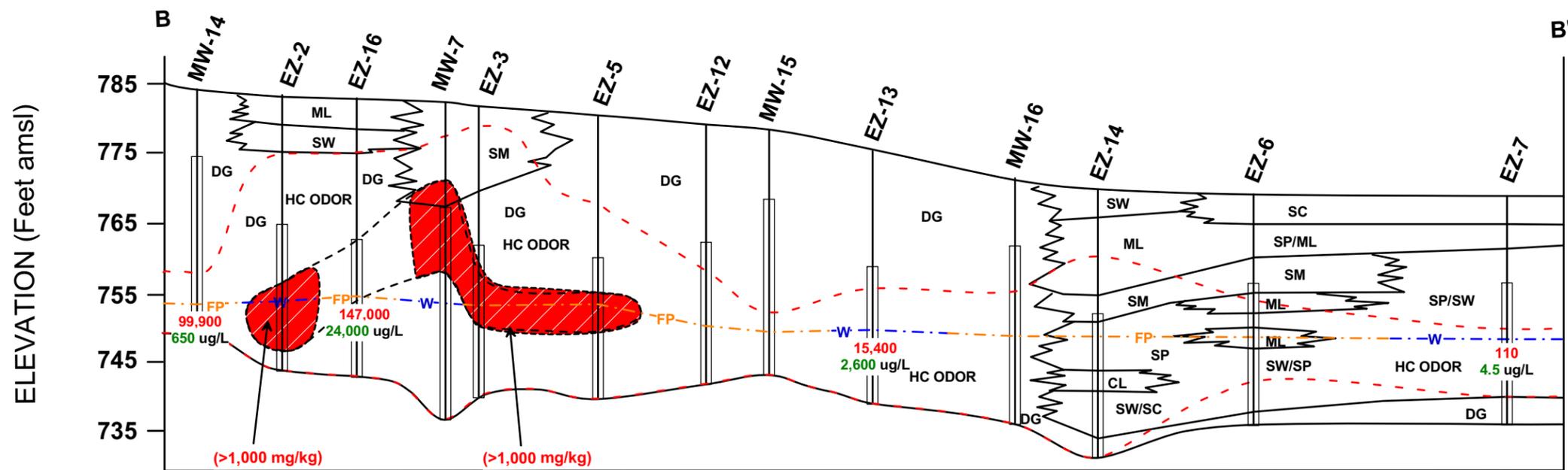
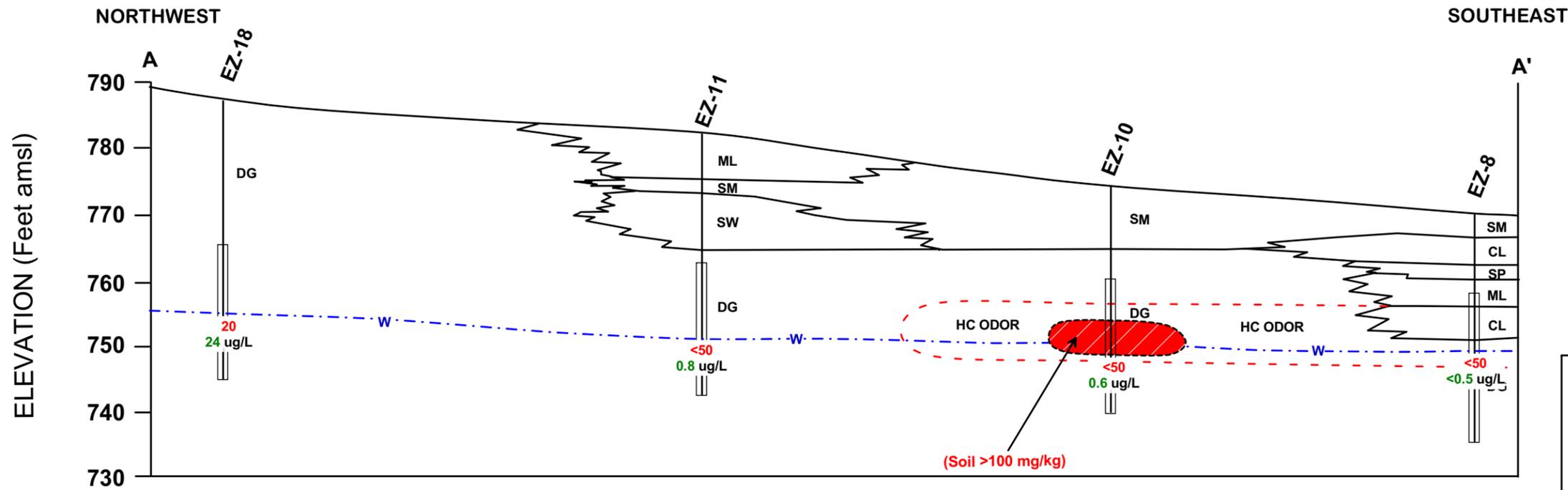
MW-17	— MONITORING WELL		SOIL TYPES
	SOIL SAMPLE LOCATION		DECOMPOSED GRANITE
	SLOTTED PVC		PEA GRAVEL
TD=45'	TOTAL DEPTH IN FEET BGS		SILT, SANDY SILT
			SILTY SAND
			POORLY GRADED SAND
			WELL GRADED SAND
			GROUNDWATER LEVEL



 NORTH	Design By: K.H.K.	Drawn By: EFD	Date: 8/26/2010	Rev.: 9/08/2010
	 HORIZONTAL SCALE (APPROXIMATE DIMENSIONS)		<b>RAPID GAS, INC.</b> <b>SERVICE STATION #37</b> 6020 ARLINGTON AVENUE RIVERSIDE, CALIFORNIA	
 Atlas • Environmental Products and Services • Air/Water/Soil Permitting and Monitoring • Site Assessment and Remediation • Hazardous Waste Management 3185 AIRWAY AVENUE, SUITE D-1 COSTA MESA, CA 92626 PHONE: (714) 890-7128	<b>CROSS-SECTIONS</b> <b>A-A' AND B-B'</b>		DRAWING NUMBER: R37S110F19	
			<b>FIGURE 19</b>	

**APPENDIX F**  
**GEOLOGIC CROSS SECTIONS PREPARED BY GESI**

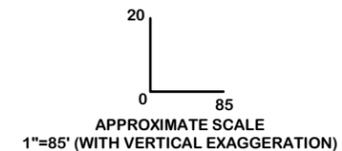




### LEGEND

- W --- GROUNDWATER ELEVATION AS MEASURED ON NOVEMBER 19, 2012
- FP --- FREE PRODUCT MEASURED IN GROUNDWATER ON NOVEMBER 19, 2012
- HC ODOR --- APPROXIMATE ZONE OF HYDROCARBON ODOR OBSERVED IN SOIL DURING SAMPLING (Dashed Where Inferred)
- ▨ SOIL TPHg CONCENTRATION AREA. (Dashed Where Inferred)
- SP/SW POORLY GRADED SAND / WELL GRADED SAND
- SM SILTY SAND
- SC/SM CLAYEY SAND / SILTY SAND
- ML SILT
- CL CLAY
- DG DECOMPOSED GRANITE
- MONITORING OR REMEDIATION WELL
- BLANK PVC CASING
- SCREENED PVC CASING
- 110 4.5 ug/L TPHg / Benzene CONCENTRATION IN GW 4Q12

DRAWN BY: RKS/GRS  
REVISION DATE: FEBRUARY 8, 2013  
CLIENT: RPMS/RAPID GAS  
JOB NO.: 08-154

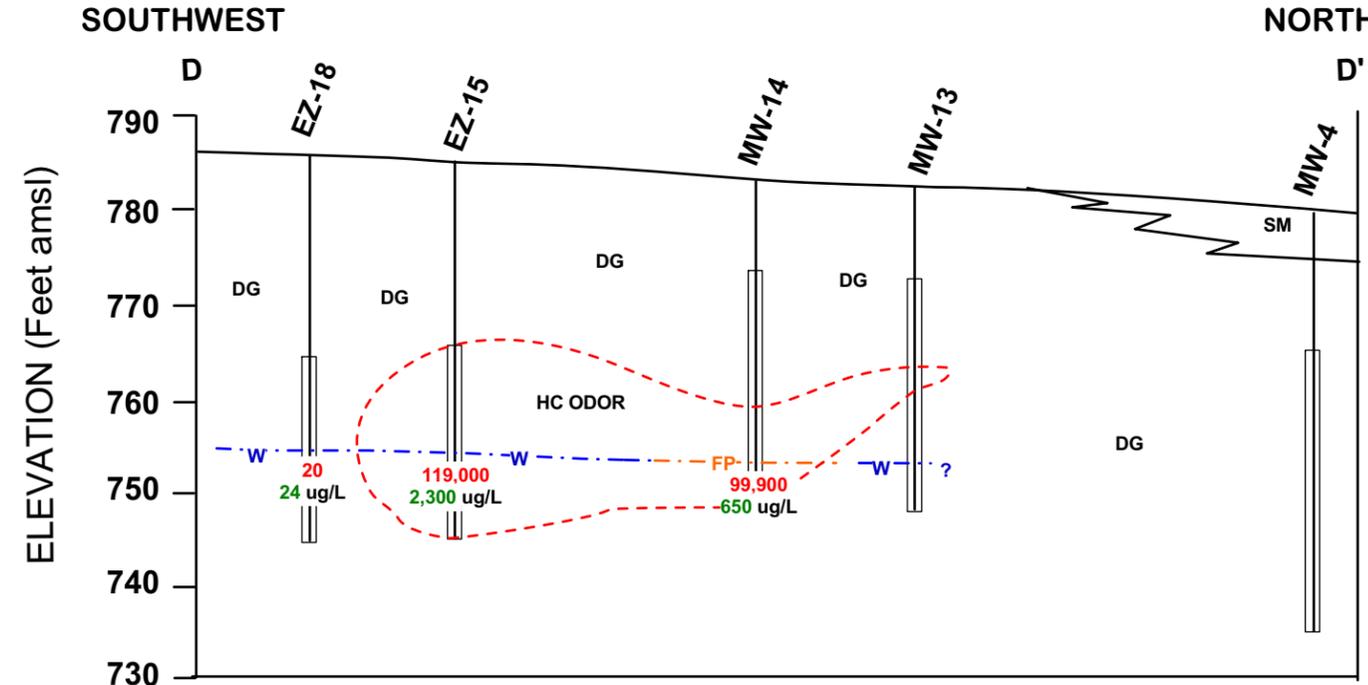
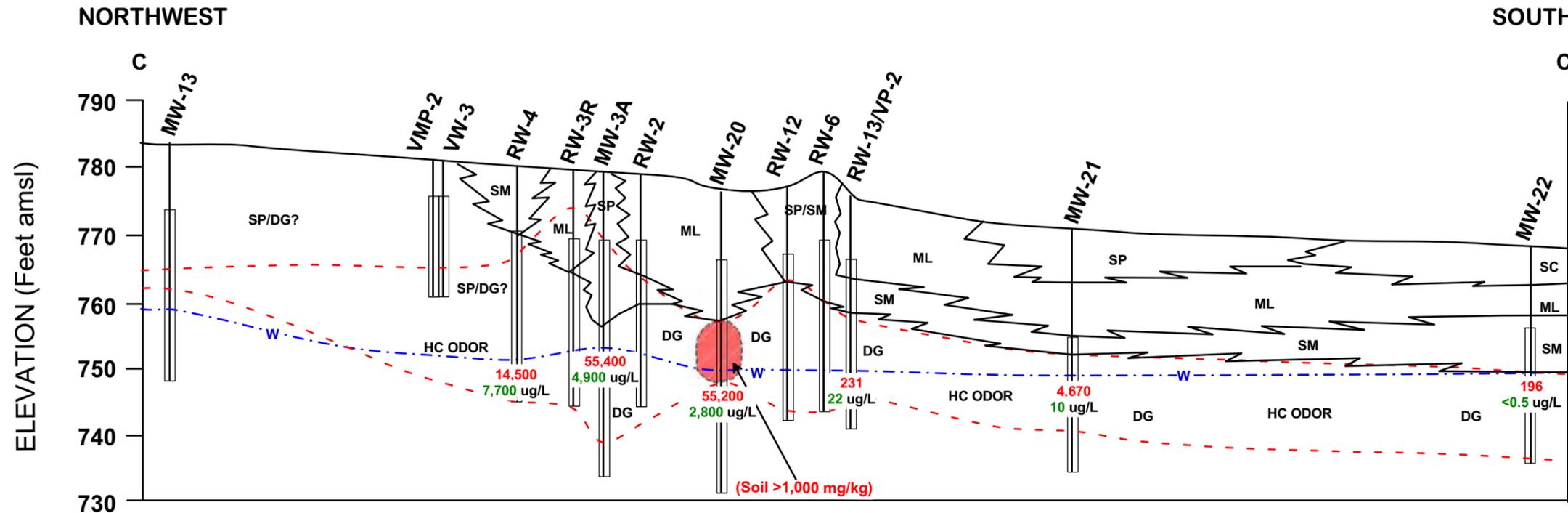


GEOENVIRO SERVICES, INC.

CROSS SECTION  
A-A' and B-B'  
WITH TPHg CONCENTRATIONS IN SOIL AND  
TPHg / BENZENE CONCENTRATIONS IN GW

COMMINGLED PLUME  
RAPID GAS #37 &  
FORMER EZ-SERVE (ARCO 1216)  
6020 & 6050 ARLINGTON AVENUE  
RIVERSIDE, CA

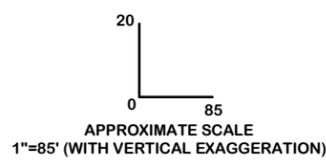
MARCH 2013FIGURE 9



**LEGEND**

- W: GROUNDWATER ELEVATION AS MEASURED ON NOVEMBER 19, 2012
- FP: FREE PRODUCT MEASURED IN GROUNDWATER ON NOVEMBER 19, 2012
- HC ODOR: APPROXIMATE ZONE OF HYDROCARBON ODOR OBSERVED IN SOIL DURING SAMPLING (Dashed Where Inferred)
- Soil TPHg Concentration Area: SOIL TPHg CONCENTRATION AREA. (Dashed Where Inferred)
- SP/SW: POORLY GRADED SAND / WELL GRADED SAND
- SM: SILTY SAND
- SC/SM: CLAYEY SAND / SILTY SAND
- ML: SILT
- CL: CLAY
- DG: DECOMPOSED GRANITE
- Monitoring Well Symbols: MONITORING OR REMEDIATION WELL, BLANK PVC CASING, SCREENED PVC CASING
- Concentration Legend: 196 TPHg / Benzene CONCENTRATION IN GW 4Q12, <0.5 ug/L

DRAWN BY: RKS/GRS  
 REVISION DATE: FEBRUARY 8, 2013  
 CLIENT: RPMS/RAPID GAS  
 JOB NO.: 08-154

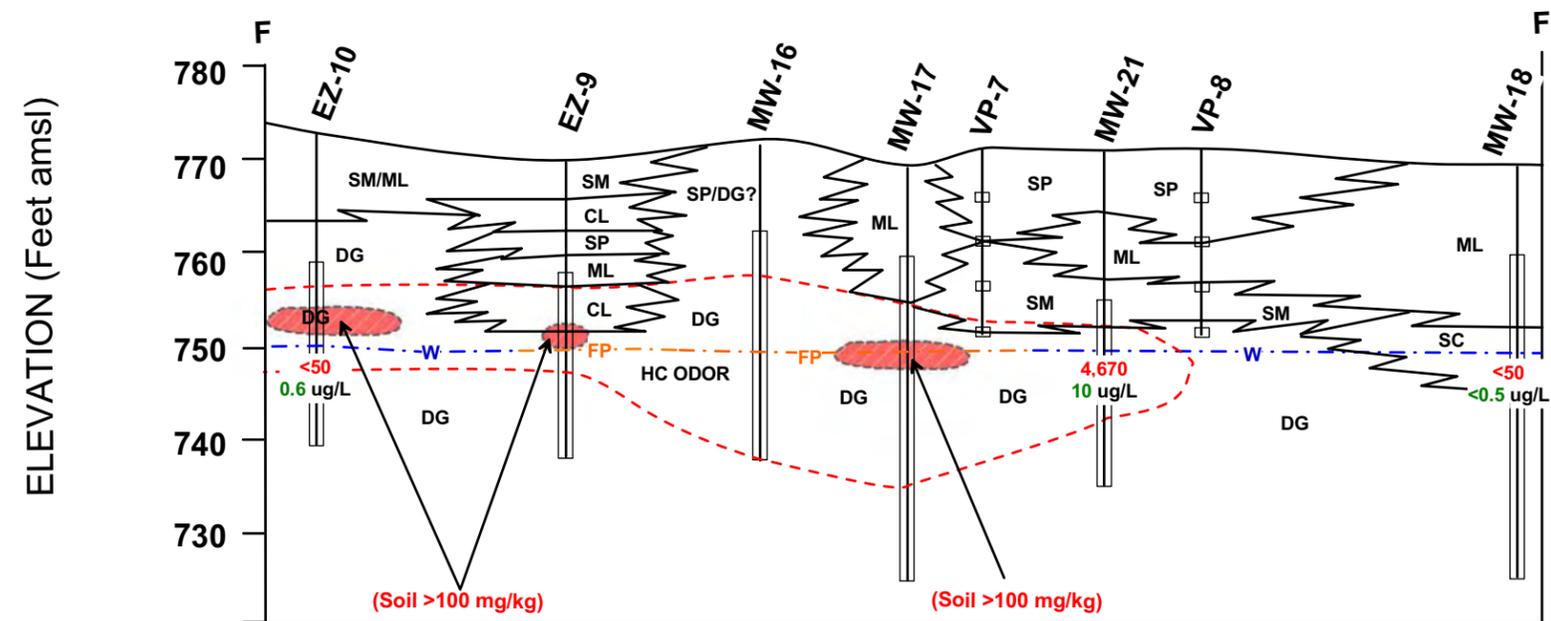
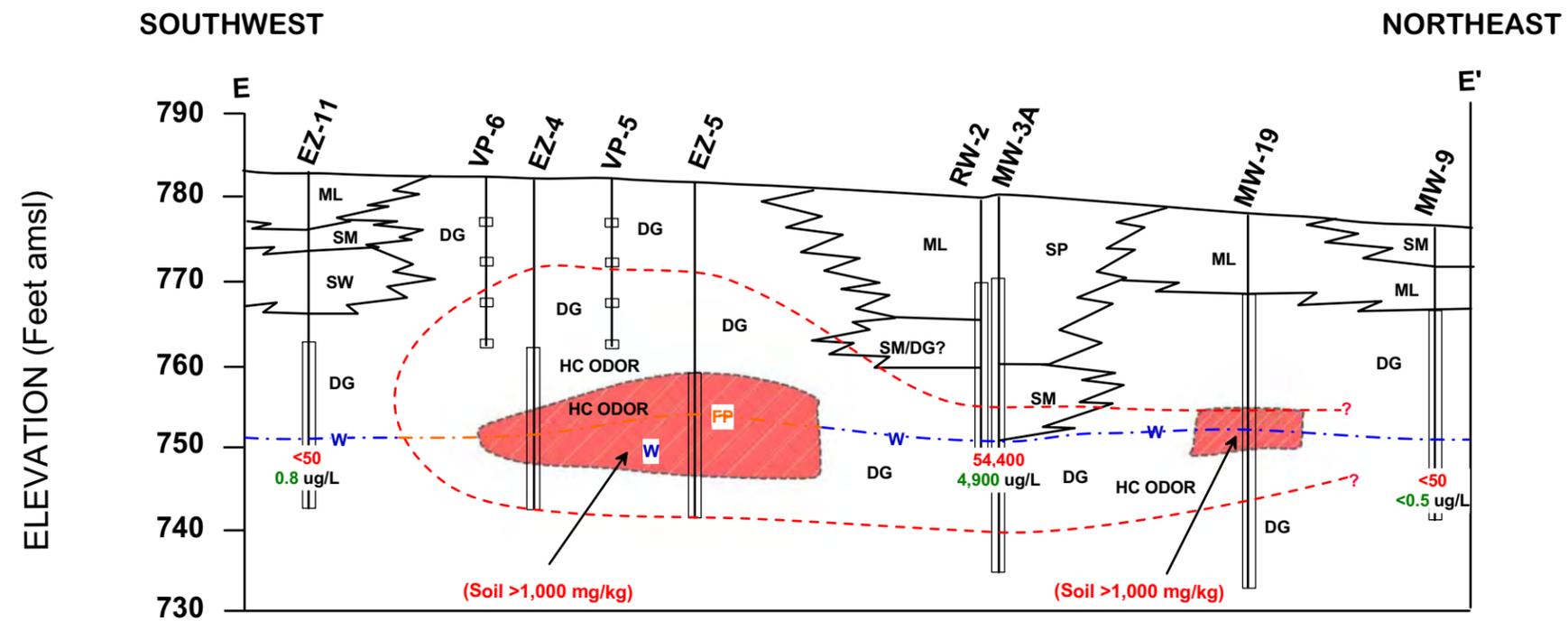


**GEOENVIRO SERVICES, INC.**

**CROSS SECTION**  
 C-C' and D-D'  
 WITH TPHg CONCENTRATIONS IN SOIL AND  
 TPHg / BENZENE CONCENTRATIONS IN GW

COMMINGLED PLUME  
 RAPID GAS #37 &  
 FORMER EZ-SERVE (ARCO 1216)  
 6020 & 6050 ARLINGTON AVENUE  
 RIVERSIDE, CA

**MARCH 2013** **FIGURE 10**



**LEGEND**

- W- GROUNDWATER ELEVATION AS MEASURED ON NOVEMBER 19, 2012
- FP- FREE PRODUCT MEASURED IN GROUNDWATER ON NOVEMBER 19, 2012
- HC ODOR APPROXIMATE ZONE OF HYDROCARBON ODOR OBSERVED IN SOIL DURING SAMPLING SOIL TPHg CONCENTRATION AREA. (Dashed Where Inferred)
- SP/SW POORLY GRADED SAND / WELL GRADED SAND
- SM SILTY SAND
- SC/SM CLAYEY SAND / SILTY SAND
- ML SILT
- CL CLAY
- DG DECOMPOSED GRANITE
- MONITORING OR REMEDIATION WELL
- BLANK PVC CASING
- 4,670 TPHg / Benzene CONCENTRATION IN GW 4Q12
- 10 ug/L
- SCREENED PVC CASING

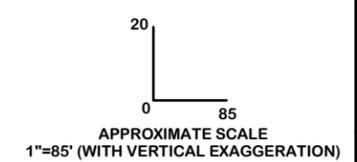
DRAWN BY: RKS/GRS  
 REVISION DATE: FEBRUARY 8, 2013  
 CLIENT: RPMS/RAPID GAS  
 JOB NO.: 08-154

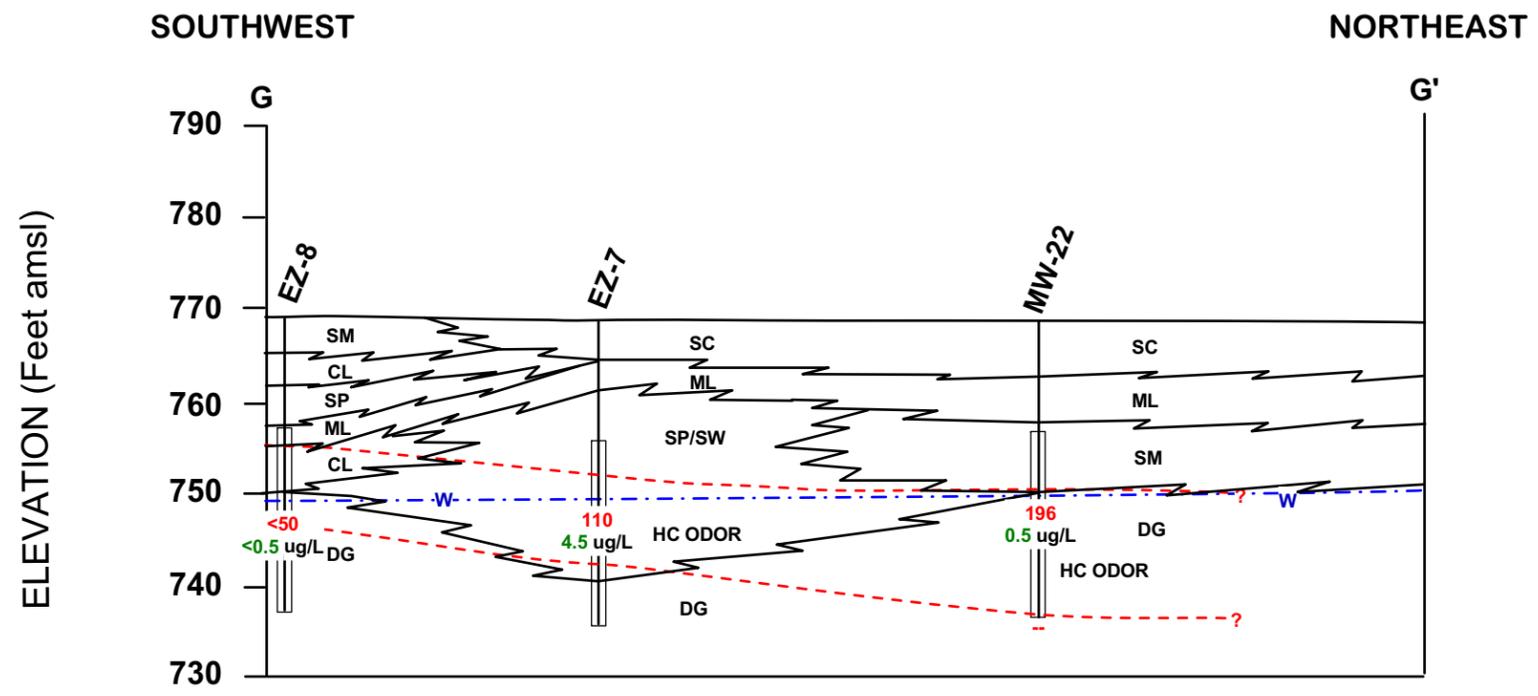
**GEOENVIRO SERVICES, INC.**

**CROSS SECTION  
 E-E' and F-F'  
 WITH TPHg CONCENTRATIONS IN SOIL AND  
 TPHg / BENZENE CONCENTRATIONS IN GW**

COMMINGLED PLUME  
 RAPID GAS #37 &  
 FORMER EZ-SERVE (ARCO 1216)  
 6020 & 6050 ARLINGTON AVENUE  
 RIVERSIDE, CA

**MARCH 2013** **FIGURE 11**





### LEGEND

- - W - - GROUNDWATER ELEVATION AS MEASURED ON NOVEMBER 19, 2012
- - FP - - FREE PRODUCT MEASURED IN GROUNDWATER ON NOVEMBER 19, 2012
- - HC ODOR - - APPROXIMATE ZONE OF HYDROCARBON ODOR OBSERVED IN SOIL DURING SAMPLING (Dashed Where Inferred)
- SOIL TPHg CONCENTRATION AREA. (Dashed Where Inferred)
- SP/SW POORLY GRADED SAND / WELL GRADED SAND
- SM SILTY SAND
- SC/SM CLAYEY SAND / SILTY SAND
- ML SILT
- CL CLAY
- DG DECOMPOSED GRANITE

196 TPHg / Benzene CONCENTRATION IN GW 4Q12  
0.5 ug/L

DRAWN BY: RKS/GRS  
 REVISION DATE: FEBRUARY 8, 2013  
 CLIENT: RPMS/RAPID GAS  
 JOB NO.: 08-154

20  
 0 85  
 APPROXIMATE SCALE  
 1"=85' (WITH VERTICAL EXAGGERATION)

GEOENVIRO SERVICES, INC.

CROSS SECTION  
G-G'  
WITH TPHg CONCENTRATIONS IN SOIL AND  
TPHg / BENZENE CONCENTRATIONS IN GW

COMMINGLED PLUME  
 RAPID GAS #37 &  
 FORMER EZ-SERVE (ARCO 1216)  
 6020 & 6050 ARLINGTON AVENUE  
 RIVERSIDE, CA

MARCH 2013
FIGURE 12

**State of California**  
**California Regional Water Quality Control Board**  
**Santa Ana Region**

3737 Main Street, Suite 500, Riverside, California 92501-3348  
Phone (951) 782-4130 - FAX (951) 781-6288 - TDD (951) 782-3221  
<http://www.waterboards.ca.gov/santaana>

**CLEANUP AND ABATEMENT ORDER NO. R8-20165-00348**

Directing

Restructure Petroleum Marketing Services of California, Inc.;

United El Segundo, Inc.;

Rapid Gas, Inc.;

~~J and R Wong Family Limited Partnership—II, LP;~~

~~6160 Arlington Ave., LLC;~~

My Montecito Inc., SH;

and

CF United PropCo LLC

(Collectively referred to as the ~~Responsible Parties~~ Dischargers)

To Cleanup and Abate the Effects of Pollution and Nuisance  
at

The parcels located at 6020 Arlington Avenue and ~~616050~~ 616050 Arlington Avenue (which includes a parcel formerly identified as referenced currently by 6050160 Arlington Avenue); and surrounding impacted parcels in the City of Riverside, California, affected by commingled contamination emanating therefrom (the Site).

This Order is being issued pursuant to authority granted ~~by California Law and Regulation~~ under the Porter-Cologne Water Quality Control Act (Water Code) sections 13304 and 13267, ~~Health and Safety Code section 25296.10 and California Code of Regulations, Title 23 (UST Regulations)~~.

The California Regional Water Quality Control Board, Santa Ana Region (Regional Board), finds, ~~with respect to the Responsible Parties~~, the following:

**PROPERTY OWNERSHIP AND SITE OPERATIONS**

**1. 6020 Arlington Avenue Property:**

- a. A gasoline service station facility owned by United El Segundo, Inc. (United) at the 6020 Arlington Avenue address, referenced by assessor parcel number (APN) 227-022-042, in Riverside, California from at least 1997 until 2014. Rapid Gas, Inc. (Rapid

Gas) operated the service station facility at the above-referenced address dating back to at least 1992.

- b. United was also the owner and Rapid Gas was the operator of the UST system, including four USTs (1-20,000 gallon; 1-10,000 gallon; 2-5,000 gallon capacity) and associated product delivery components, which were identified as a source of hydrocarbon contamination. The leaky tank system was removed in 2002 and replaced and/or upgraded in conjunction with improvements and ongoing retail fueling operations.
- c. United sold the property and all improvements, including the underground storage tank (UST) system and product delivery components, to CF United PropCo LLC (CF PropCo) in July 2014. CF PropCo is ~~understood to be~~ the current landowner and fee titleholder, as well as the registered tank operator associated with retail fueling activities currently being conducted at the 6020 Arlington Avenue property.

## 2. 6050 Arlington Avenue Property:

- a. County records indicate that the 6050 Arlington Avenue property, referenced currently by a 6160 Arlington Avenue street address, was formerly occupied by a retail gasoline service station that was owned and operated by E-Z Serve of California, Inc. (E-Z Serve) until around 1986. ~~Records further indicate that t~~The service station (APN 191-190-005) and adjacent parcels (APN 191-190-002 and 191-190-003) located in Riverside, California, were subsequently redeveloped into a commercial shopping center, which still occupies the former footprint of the E-Z Serve facility and adjacent parcels along Arlington Avenue, immediately west of Adams Avenue.
- b. E-Z Serve ceased retail-fueling operations at its service stations throughout California in approximately 1985 or 1986. On April 22, 1997, Restructure, Inc. purchased all shares of capital stock in E-Z Serve Petroleum Marketing Company, inclusive of the company itself and all subsidiaries. As a result of this transaction, E-Z Serve Petroleum Marketing of California, Inc. became the wholly-owned subsidiary of Restructure, Inc. Restructure, Inc. subsequently renamed E-Z Serve Petroleum Marketing Company of California, Inc. to Restructure Petroleum Marketing Services of California, Inc. (RPMS). According to RPMS representatives, RPMS has no assets or net worth, other than the bank account it maintains for purposes of collecting (and dispersing) reimbursement monies paid to the claimant by the State's Underground Storage Tank Cleanup Fund (USTCF) for corrective action activities conducted at contaminated properties formerly operated by E-Z Serve throughout California.
- c. In 2001, the J and R Wong Family Limited Partnership – II, LP (~~J and R Wong~~) purchased the commercial shopping center property, inclusive of the former E-Z Serve parcel and other adjacent parcels collectively identified by a 6160 Arlington Avenue address. A Phase I Site Assessment performed in conjunction with due diligence prior to the property transfer failed to identify the property's former operational history as a gas station. However, several other properties in the vicinity with recognized contaminant plumes were identified as representing a potential source of pollution or contamination that could impact the property. The closest of these sites to be identified was the operating United and/or Rapid Gas service station situated immediately across the street to the east, at 6020 Arlington Avenue. Since

the property itself was not identified as a current or historic source of contamination, the report concluded that the presence of contamination beneath the property could be attributed to contaminant transport from these other documented releases via groundwater flow/migration. Only through subsequent investigations completed by United and/or Rapid Gas was the legacy of the 6050 Arlington Avenue property's operational history revealed/discovered.

- d. J and R Wong ~~Family Limited Partnership—II, LP~~ sold the 6160 Arlington Avenue shopping center property, inclusive of the parcel once occupied by the E-Z Serve station, to a limited liability corporation identified as 6160 Arlington Ave., LLC, on November 17, 2011. The property was purchased by 6160 Arlington Ave., LLC~~this investment group~~ with full knowledge and understanding of its impaired condition, as well as the ongoing investigations and testing being conducted in conjunction with efforts to mitigate the former E-Z Serve release. ~~The~~ 6160 Arlington Ave., LLC ~~investment group~~ retained ownership of the shopping center property until April 2013.
- e. On April 29, 2013, 6160 Arlington Ave., LLC sold the shopping center property, inclusive of the former E-Z Serve station footprint, via internet auction. According to 6160 Arlington Ave., LLC~~the seller~~, the property was offered in "as-is" condition and proper disclosure of the property's impaired environmental condition was conveyed to prospective purchasers. The property was purchased by My Montecito Inc., SH (My Montecito) and ~~My Montecito Inc., SH~~ currently holds the title for the property.

### IDENTIFICATION OF ~~RESPONSIBLE PARTIES~~DISCHARGERS

3. For purposes of this Order, and pursuant to Water Code section 13304 ~~applicable State laws and regulations~~<sup>4</sup>, RPMS; United; Rapid Gas; ~~J and R Wong Family Limited Partnership—II, LP; 6160 Arlington Ave., LLC;~~ My Montecito Inc., SH and CF PropCo, have been identified as the Responsible Parties~~Dischargers~~.

3.

a. Water Code section 13304, subd. (a), provides, in part, that:

"A person who has discharged or discharges waste into the waters of the state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts."

b.  
a.c. United, Rapid Gas and RPMS are being named as Responsible Parties because, as provided by additional findings herein, they or their predecessors owned and

<sup>4</sup>~~Water Code section 13304 and California Code of Regulations, title 23, section 2720, define who can be named a responsible party and held liable for cleanup of waste and contamination resulting from leaks from an underground storage tank, respectively.~~

operated leaky UST systems that have been identified as the source of the hydrocarbon pollutants beneath the 6020 and 616050 Arlington Avenue properties, as well as the surrounding and downgradient Site vicinity.

~~b. J and R Wong Family Limited Partnership—II, LP and 6160 Arlington Ave., LLC are identified as Responsible Parties because they owned the property from which the E-Z Serve release originated for more than a brief period of time, during which on-site business activities may or may not have contributed to, or exacerbated contamination stemming from the former E-Z Serve retail fueling operations. Even if conditions were not exacerbated, their ownership of the 6160 Arlington Avenue shopping center occupied by the former E-Z Serve station, subjects them to liability under Water Code section 13304, Health and Safety Code section 25296.10 and California Code of Regulations, Title 23 (UST Regulations), section 2720.~~

~~d. My Montecito Inc., SH, is named a Responsible PartyDischarger because as the current land-owner, it possesses legal control of the commercial shopping center6160 Arlington Ave, which now encompassesinclusive of the 6050 Arlington Avenue parcel formerly occupied by the E-Z Serve station. Pollutants remain on the property, which constitute a continuing and/or threatened discharge of waste; thus, subjecting My Montecito to, and is thus subject to liability under Water Code section 13304, Health and Safety Code section 25296.10 and California Code of Regulations, Title 23(UST Regulations), section 2720. Furthermore, My Montecito Inc., SH's unwillingness to cooperate by providing reasonable access since acquiring the property more than two2 years ago has not only prevented the other identified Responsible Partiesparties from conducting further subsurface assessment, environmental testing and groundwater plume monitoring, but has delayed implementation of the corrective action activities needed to remediate source areas beneath the former E-Z Serve property.~~

~~e.e.~~

~~CF PropCo is being named a Responsible PartyDischarger because the corporation has owned the 6020 Arlington Avenue property for more than a brief period of time, during which on-site business activities associated with ongoing retail fueling activities may or may not have contributed to, or exacerbated contamination associated with United and/or Rapid Gas' former fueling operations. Even if conditions have not been exacerbated, CF PropCo is the current fee title holder with legal control of the 6020 Arlington Avenue parcel, and is thus subject to liability under Water Code section 13304 for the continuing and/or threatened discharge of pollutants., Health and Safety Code section 25296.10 and California Code of Regulations, Title 23 (UST Regulations), section 2720.~~

~~d.f. The J and R Wong Family Limited Partnership—II, LP and 6160 Arlington Ave., LLC, are not being named as Dischargers because they are not current owners of any of the subject properties, they cooperated with investigation and cleanup work conducted by others during their period of ownership, and there is currently no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent or in the downgradient Site vicinity are the result of releases or discharges stemming from business activities conducted on the shopping center property during the time when it was controlled by the J and R Wong Family Limited Partnership—II, LP or 6160 Arlington Ave., LLC~~

entities.

- e.g. As provided herein, ~~B~~ based on Site investigations and test results included in the Regional Board's case files, the Regional Board ~~staff~~ has determined that the subsurface contamination identified at the Site originated from historical leaks of petroleum hydrocarbon-related chemicals that occurred as a result of operations formerly conducted at both the United and/or Rapid Gas and E-Z Serve gasoline stations described herein.
- ~~f. Currently, there is no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent or in the downgradient Site vicinity are the result of releases or discharges stemming from business activities conducted on the shopping center property after 2001, when it was controlled by the J and R Wong Family Limited Partnership—II, LP or 6160 Arlington Ave., LLC entities, respectively. Similarly, there is no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent or in the downgradient Site vicinity are the result of releases or discharges stemming from business activities conducted since CF PropCo acquired the 6020 Arlington Avenue parcel from United and/or Rapid Gas.~~
- ~~g.a. My Montecito Inc., SH's unwillingness to cooperate by providing reasonable access since acquiring the property more than 2 years ago has not only prevented the other identified Responsible Parties from conducting further subsurface assessment, environmental testing and groundwater plume monitoring, but has delayed implementation of the corrective action activities needed to remediate source areas beneath the former E-Z Serve property.~~
- ~~h. As a result of this inaction by the Responsible Parties Dischargers, Site contamination attributed to the E-Z Serve station has gone unmitigated, and the associated groundwater impacts have likely spread and/or migrated further off-Site, exacerbating site conditions.~~
- h. This Cleanup and Abatement Order is being issued to **all** of the **Responsible Parties Dischargers** to make them jointly and severally liable for the investigation and cleanup activities associated with the commingled releases stemming from the Site.
- i. United, Rapid Gas, and CF PropCo argue against joint and several liability and contend that responsibility for remediating the Site should be apportioned between the parties in relation to the discharges from each parcel. As explained below, the discharges from each property are sufficiently commingled to justify imposing joint and several liability for investigating and remediating the Site. Further, a comprehensive remedial response is necessary to mitigate the full extent of the contamination and provides the best path for completing remediation of the Site.

## SITE BACKGROUND

### 4. Unauthorized Discharge of Waste - 6020 Arlington Avenue, Riverside, CA (**United and/or Rapid Gas property**):

- a. In 1992, one 550-gallon steel waste oil UST was removed from the United and/or

Rapid Gas facility and was not replaced. A total of three soil samples were collected from the tank pit to characterize subsurface conditions. The samples contained total recoverable petroleum hydrocarbons (TRPH) at concentrations ranging from 23 milligrams per kilograms (mg/kg) to 950 mg/kg, but benzene, toluene, ethyl benzene and xylenes (BTEX) and halogenated organics were not reported above detection levels.

- b. Preliminary subsurface investigations were completed to characterize the extent of hydrocarbons beneath the facility in October 1998. Soil borings and groundwater monitoring wells completed in all three corners of the property exhibited hydrocarbon impacts. The most significant soil impacts were encountered in MW-1, installed northwest of operating USTs, where TPH-G and BTEX were detected at 10,300 mg/kg, and 42 mg/kg, 269 mg/kg, 155 mg/kg and 1,050 mg/kg, respectively. MtBE was also reported as high as 9.5 mg/kg at this location. Groundwater samples from the three monitoring wells were heavily-impacted with TPH-G concentrations ranging from 73,800 micrograms per liter [ $\mu\text{g/L}$ ] to 103,000  $\mu\text{g/L}$  and BTEX as high as 22,500  $\mu\text{g/L}$ , 26,700  $\mu\text{g/L}$ , 2,330  $\mu\text{g/L}$  and 14,300  $\mu\text{g/L}$ , respectively, but also contained moderate concentrations of MtBE, (613  $\mu\text{g/L}$ ) and other petroleum-related compounds. Based on the data generated from these perimeter points, the hydrocarbon impacts were widespread and extended beyond property boundaries.
- c. Between December 1999 and July 2000, additional phases of assessment were completed to characterize the extent of groundwater impacts north, west, east and southeast of the 6020 Arlington Avenue service station property. Elevated TPH-G and BTEX, and to a lesser degree MtBE and tertiary butyl alcohol (TBA), were observed in groundwater samples collected from wells east of the service station (MW-6/8), as high as 19,300  $\mu\text{g/L}$ , 4,620  $\mu\text{g/L}$ , 146  $\mu\text{g/L}$  and 189  $\mu\text{g/L}$ , respectively. Significant groundwater impacts were also observed in MW-7, installed on the shopping center west of the United and/or Rapid Gas station, where TPH-G and BTEX were reported at 33,000  $\mu\text{g/L}$ , 1,850  $\mu\text{g/L}$ , 7,630  $\mu\text{g/L}$  and 1,430  $\mu\text{g/L}$  and 6,600  $\mu\text{g/L}$ , respectively. Based on these results, additional characterization was needed to delineate dissolved-phase hydrocarbon contamination extending to the west, east and southeast. The presence of hydrocarbon impacts in shallow vadose zone soil collected from MW-7 at 5 feet and 10 feet bgs (above the water table), in tandem with the elevated dissolved-phase impacts observed in the corresponding well, also provided evidence to suggest a potential source originating from the shopping center property that would later be attributed to the E-Z Serve station that operated there more than a decade earlier.
- d. Additional soil testing was conducted in November and December 2002, when the USTs and product delivery piping were removed and replaced in conjunction with station upgrades. Soil samples from the northern UST excavation, as well as those collected beneath both dispensers, revealed elevated concentrations of gasoline-related hydrocarbons and fuel oxygenates, including total petroleum hydrocarbons as gasoline (TPH-G), BTEX, methyl tert butyl ether (MtBE) and lead, while samples collected in the southern tank cavity contained only low or non-detect TPH-G and BTEX, but exhibited elevated levels of MtBE. The widespread distribution of hydrocarbon impacts, and presence of significant lead and MtBE impacts observed in soil, suggested an operational history that likely included at least two separate unauthorized releases. Impacted soil was removed to the degree practical, but

contaminant concentrations were observed to be increasing with depth and inaccessible due to site constraints imposed by the adjacent sidewalks, streets and right-of-ways. Approximately 1,100 tons of hydrocarbon-impacted soil were removed and transported off-site for disposal.

- e. From December 2001 through September 2006, fourteen additional groundwater wells were completed to further characterize the distribution of petroleum hydrocarbon north and east of the 6020 Arlington Avenue property and in the residential areas located to the southeast along San Vicente and Brunswick Avenue, as well as northwest and southwest of the property in Arlington Avenue and Adams Street, respectively. Peripheral monitoring points MW-11, MW-12, MW-13 and MW-18, situated 550 feet east, 600 feet southeast, 175 feet northwest, and 425 feet southeast of the service station, respectively, were non-detect for petroleum hydrocarbon constituents. However, groundwater samples collected from MW-14, located 175 feet west of the facility, were heavily-impacted with TPH-G and BTEX concentrations reported at 120,000 µg/L and 1,900 µg/L, 38,000 µg/L, 3,300 µg/L, and 17,600 µg/L, respectively. Wells MW-15 and MW-16, installed 125 feet and 255 feet south of the service station, also exhibited elevated TPH-G and BTEX as high as 160,000 µg/L and 33,000 µg/L, 5,700 µg/L, 3,400 µg/L and 16,600 µg/L, respectively. Well MW-17, installed south of the United and/or Rapid Gas facility in the residential neighborhood along San Vicente Avenue, exhibited TPH-G and BTEX impacts, but also contained MtBE (1,400 µg/L). Based on these findings, dissolved-phase hydrocarbons and fuel oxygenates had migrated a significant distance downgradient of the 6020 Arlington Avenue service station property, extending beneath the adjacent Lube & Tune facility and residential properties situated along San Vicente. Groundwater impacts were not defined south, southeast and west of the United and/or Rapid Gas facility.
- f. Subsequent sampling of monitoring wells MW-14 through MW-16 indicated that the chemical properties and make-up of hydrocarbon constituents in groundwater were generally characterized by very high BTEX concentrations and much lower or non-detect levels of fuel oxygenates, such as MtBE and tertiary butyl alcohol (TBA). Accompanied by a predominantly south or southeasterly groundwater flow and gradient, the data provided further evidence of a contributing source stemming from the shopping center property located west of the service station. Hydrocarbon impacts reported in upgradient well MW-5 also pointed to a third potential source originating from the former Shell station that once operated north of Arlington Avenue. However, test data collected since that time generally revealed limited residual hydrocarbon impacts to soil and groundwater beneath the former Shell station, which suggested that the former Shell operations were not a significant contributor to the widespread contamination in the surrounding area.<sup>2</sup>
- g. In July 2009, liquid-phase hydrocarbons (LPH) or gasoline free product was observed for the first time in wells MW-15 through MW-17, situated south of the service station in Adams Avenue, at thicknesses ranging from 0.30 feet to 0.70 feet. Subsequent groundwater monitoring indicated that the presence of widespread LPH appeared to be attributed to an overall decline in groundwater elevations (nearly 10

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<sup>2</sup> Based on information currently available, the release(s) from the former Shell station have not commingled with the plume subject to this Cleanup and Abatement Order.

feet to date), which was allowing product trapped in subsurface strata below the water table to drain from soil pore space and collect in monitoring wells. As a result of these water level changes, free product was reported in an increasingly larger number of the on-site and off-site wells installed during earlier phases of site characterization.

- h. In February 2010, forensic analysis was completed on free product samples collected from monitoring wells MW-2, MW-7 and MW-16, located on both service station properties, and along Adams Avenue, respectively, to determine whether there was any distinguishable difference in the free product being observed east and west of Adams Avenue, and thereby differentiate what originated from each of the two adjacent sites. The forensic study confirmed that the gasoline free product was attributed to at least two distinct releases. While all three of the product samples were characterized as weathered/degraded gasoline with lead additives, the product collected from MW-2 could be distinguished from the LPH observed in MW-7 based on the relative amount and combination of alkyl lead compounds and other key markers in the chemical make-up of gasoline-range organics and the product sample collected from MW-16 appeared to most closely resemble the composition and formulation exhibited by free product from MW-7. As a result, free product observed in MW-7 and MW-16 appeared to be primarily attributed to the former E-Z Serve station located west of Adams Avenue. Based on these findings, Regional Board staff instructed United to initiate free product recovery from on-site and off-site wells east of Adams Avenue, including MW-2, MW-6, MW-17, MW-19 and MW-20.
- i. From June 2005 through September 2011, soil vapor extraction was conducted to remediate source area soils beneath the 6020 Arlington Avenue service station property and downgradient Lube & Tune facility located at 6000 Arlington Avenue. Between April 2006 and December 2009, air-sparging was also performed to volatilize dissolved-phase hydrocarbons into the vapor phase, where they could be recovered and destroyed by the operating vapor extraction system. Air-sparging was later terminated in December 2009, when the presence of LPH or gasoline free product raised a safety concern about conducting the activities in close proximity to residences. Soil vapor extraction continued through September 2011, in order to provide ongoing source removal and vapor abatement proximate to the residences, but these efforts were also terminated when they were determined to be under-scaled in comparison to the magnitude and widespread distribution of hydrocarbon contamination exposed by the receding water table. Approximately 44,135 pounds of hydrocarbons were reportedly removed as a result of this corrective action effort.
- j. The majority of site assessment and remediation activities described above were funded with reimbursement monies provided by the State's Underground Storage Tank Cleanup Fund (USTCF) under Claim No. 13675, up to the total eligible limit of \$1.5 million dollars allowed by law. Subsequent phases of site investigation and interim corrective action conducted jointly by Rapid Gas and RPMS, between 2011 and April 2015 (discussed later in this Order), were also funded with state reimbursement monies, to the sum of an additional \$1.5 million dollars (\$3 million total), under the USTCF Commingled Plume Account.

**5. Unauthorized Discharge of Waste - 616050 Arlington Avenue (~~Former E-Z Serve site~~):**

- a. As indicated, E-Z Serve's fueling operations and release history were revealed when MW-7 was installed on the shopping center property located across Adams Avenue, to characterize groundwater impacts west of 6020 Arlington Avenue service station. Soil data collected during the investigation revealed elevated TPH-G and BTEX in the vadose zone above the water table and very high dissolved-phase hydrocarbon impacts to underlying groundwater, which suggested the presence of a source stemming from the property itself rather than being the result of contaminant transport via groundwater from the gas station facility across the street.
- b. According to records obtained from County fire and health departments, the eastern-most portion of the present-day shopping center was formerly occupied by a service station that operated at the historic street address of 6050 Arlington Avenue. The registered owner of the USTs was E-Z Serve of California, Inc. The USTs were removed in October 1986 and soil samples collected from the fuel tank excavation showed moderate TPH-G and BTEX impacts. Based on the prevailing cleanup standards at the time, no further assessment or corrective action was requested by oversight personnel and the property was redeveloped into the commercial shopping center and it continues to operate as a shopping center.
- c. On March 25, 2004, Regional Board staff sent correspondence to RPMS to inform it of the soil and groundwater data generated by United and/or rapid Gas's off-site investigation on the shopping center property. RPMS was identified as the Responsible Party for the hydrocarbon contamination beneath the parcel and was instructed to initiate corrective action pursuant to California Code of Regulations, Title 23. Staff correspondence requested that a site assessment work plan and time schedule for completion of the requested activities be submitted no later than April 30, 2004. Regional Board staff received no response from RPMS representatives.
- d. Additional Regional Board letters were sent to RPMS on July 28, 2004 and August 3, 2005, to reiterate previous requests that RPMS initiate corrective action in accordance with California Code of Regulations, Title 23, and complete the subsurface assessment necessary to investigate petroleum hydrocarbon contamination beneath the shopping center property. Again, Regional Board staff received no response from RPMS representatives.
- e. On January 12, 2006, Regional Board staff telephoned RPMS representatives and left a detailed message regarding the previous requests issued by staff. Board staff requested that RPMS contact Regional Board staff to discuss these outstanding regulatory requirements and compliance deadlines. On January 13, 2006, the President of RPMS, Mr. Jack Ceccarelli, contacted Board staff to discuss site matters. While aware of staff's requests, he stated that the 6050 Arlington Avenue property was not included in the portfolio of California service station properties for which his corporation accepted environmental liability and responsibility. Furthermore, he claimed that RPMS had no assets or financial resources to allocate to corrective action efforts at the property. As a result, RPMS would rely upon state funding to cover the cleanup costs and would need to confirm claim eligibility under the State's USTCF before proceeding with any of the requested testing.
- f. On February 28, 2006 and March 23, 2006, Regional Board staff telephoned Mr. Ceccarelli, and left additional messages indicating that RPMS was being asked to

proceed with the necessary subsurface investigations without further delay. Staff insisted that the assessment work be completed concurrent with RPMS's pursuit of a USTCF claim, as eligibility was not guaranteed and the testing would be necessary regardless. Additionally, since RPMS's failure to comply with staff requests constituted non-compliance, its failure to act could ultimately jeopardize its eligibility determination. Regional Board staff requested that RPMS representatives contact Regional Board staff to discuss the matter further, but received no response from RPMS.

- g. On March 28, 2006, Regional Board staff issued a notice of violation to RPMS for its failure to submit a work plan as requested by Regional Board correspondence dated March 2004, July 2004 and August 2005, and established a revised compliance deadline of April 28, 2006, for submission of the required site investigation work plan. The correspondence also reiterated previous communications that RPMS's failure to comply with Regional Board requests could jeopardize USTCF eligibility.
- h. On January 2, 2009, Regional Board staff received a work plan for the subsurface investigation that had originally been requested nearly five years earlier. The scope was conditionally approved on February 18, 2009, which established a compliance deadline for submission of the investigation results by no later than the end of the 2<sup>nd</sup> Quarter 2009. Subsequent extensions granted by Regional Board staff in order to provide additional time needed to secure access agreements, obtain permits, and compile the test data, resulted in a revised compliance deadline of August 31, 2009.
- i. Preliminary site investigations were initiated to investigate leaks and/or spills associated with the former E-Z Serve station in July 2009. Between February 2010 and January 2011, additional phases of assessments were completed to further characterize hydrocarbon impacts in source areas corresponding to E-Z Serve's tank system (e.g. USTs and dispenser islands) and delineate the extent of groundwater impacts downgradient of the property.

Soil and groundwater results from source area monitoring wells EZ-1 through EZ-3 revealed widespread contamination beneath the property. Elevated TPH-G and BTEX concentrations were reported in soil samples collected at all three locations, at concentrations as high as 5,640 mg/kg, and 27 mg/kg, 251 mg/kg, 107 mg/kg and 734 mg/kg, respectively. Groundwater data from EZ-1 and EZ-2, installed proximate to the former tank cavity and northern dispenser island respectively, also revealed very high-dissolved-phase TPH-G and BTEX, at maximum concentrations of 190,000 µg/L and 32,000 µg/L, 31,500 µg/L, 3,360 µg/L and 17,000 µg/L, respectively. Groundwater was not collected from EZ-3, due the presence of free product, which was measured at a thickness of approximately 2 feet.

Water quality data from wells installed in the surrounding area indicated that the groundwater impacts extended beneath the public right-of-ways located south and southeast of the former E-Z Serve property. Gasoline free product was encountered in well EZ-4, located south of the property in Colorado Avenue. While LPH/free product was not initially observed in EZ-5 or EZ-6, situated southeast of the E-Z Serve station, groundwater samples collected from these wells were heavily-impacted with TPH-G and BTEX, at concentrations as high as of 145,000 µg/L, and 18,600 µg/L, 18,100 µg/L, 5,310 µg/L and 30,000 µg/L, respectively. TBA was also

detected in EZ-5 at 1,090 µg/L. Since the TBA reported in EZ-5 was most likely attributed to more modern-day fueling operations, the data suggested that groundwater impacts stemming from the E-Z Serve release had migrated off-site and commingled with contamination emanating from the United and/or Rapid Gas station. Groundwater data collected from downgradient wells EZ-7, EZ-8 and EZ-9 also indicated that hydrocarbon-impacted groundwater had migrated beneath an elementary school property and private residences located south of Colorado Avenue, and extended more than 600 feet south and southeast along Adams Avenue.

- j. As discussed, shortly after the investigations above commenced, free product began to be reported in an increasingly larger number of the groundwater wells along Adams and Colorado Avenue. Based on quarterly monitoring data and preliminary forensic analysis of product samples collected from both service station properties, and the adjoining street, Regional Board staff instructed RPMS to initiate interim free product recovery from wells situated along the west side of Adams Avenue and source area wells on the 6160 Arlington Avenue shopping center property (former E-Z Serve station footprint).
- k. Site characterization conducted to investigate the E-Z Serve release and described above, was funded, largely if not entirely, with state reimbursement monies awarded by the USTCF's Commingled Plume Account claim CP0050.

**6. Commingled Plume Determination (6020/616050 Arlington Avenue):**

- a. In June 2011, the contaminant plumes stemming from the 6020 and 616050 Arlington Avenue parcels were determined eligible for reimbursement of cleanup costs under the State USTCF's Commingled Plume Account. This allowed for an additional \$1.5 million dollars, above and beyond the State funds already paid for United and/or Rapid Gas's cleanup efforts, to be allocated jointly for the cooperative cleanup of both releases. Site investigation and corrective action conducted jointly through 2014 were thus funded with State monies, up to the total allowable sum of \$3 million dollars (combined).
- b. Between September 2011 and January 2014, additional investigations were conducted to characterize hydrocarbon impacts proximate to E-Z Serve source areas and delineate the downgradient extent of dissolved-phase and LPH contamination along Adams Avenue and east of Adams Avenue adjacent to residences fronting Arlington Avenue, San Vicente Avenue and Brunswick Avenue. Wells EZ-12 through EZ-14 contained TPH-G and BTEX at maximum concentrations of 299,000 µg/L and 23,000 µg/L, 31,000 µg/L, 4,900 µg/L and 28,000 µg/L, respectively. Groundwater samples from EZ-15 through EZ-17 also showed elevated concentrations of TPH-G and BTEX, as well as TBA up to 970 µg/L. Subsequent monitoring has revealed persistent free product at all six locations. Well MW-21, installed 325 feet to the southeast in San Vicente Avenue, contained moderate levels of TPH-G, BTEX, MtBE and TBA, while MW-22, installed farther southeast along Brunswick Avenue, contained lower-level TPH-G and trace levels of ethyl benzene and xylenes, but was non-detect for MtBE and TBA. Trace benzene (1.0 µg/L) and naphthalene (3.5 µg/L) were reported in MW-23, but TPH-G and fuel oxygenates MtBE and TBA were not detected. Based on these investigations, dissolved-phase impacts appeared to attenuate to lower levels at a distance approximately 600 feet southeast of source

areas, but the full extent of groundwater contamination in the westerly direction was still unknown. This data gap persists to present-day.

- c. Interim corrective action was initiated to recover free-phase gasoline product from Site monitoring wells located on and downgradient of both the service station properties in March 2010. LPH recovery has been completed on a routine basis, using a combination of removal methods including manual bailing (through June 2012), vacuum-truck liquid extraction (July 2012 to July 2014), and most recently by passive and/or automated collection skimmers (November 2014 to at least January 2015). During the Fourth Quarter of 2014, product was removed from Site wells located on the United and/or Rapid Gas and Lube & Tune properties, as well as select downgradient wells situated along Adams and San Vicente Avenues, via product skimmers that were generally emptied on a weekly basis. LPH recovery is not being conducted on the shopping center property (inclusive of E-Z Serve station footprint), due to the landowner's refusal to grant access.
- d. Between August 2010 and September 2011, mobile high-vacuum dual-phase extraction (HVDPE) was performed to mitigate hydrocarbon-impacted soil and groundwater beneath the former E-Z Serve station footprint. This extraction effort reportedly removed an estimated 97,774 pounds (or 15,579 gallons) of hydrocarbon mass from subsurface soils and recovered approximately 287,990 gallons of contaminated groundwater for treatment and discharge to the sanitary sewer. Despite the extraordinary volume of hydrocarbon mass removed during the 12-month period, remediation system data collected at the conclusion of the extraction activities indicated that soil vapor and groundwater beneath the property remained heavily-impacted. This corrective action was terminated so that the temporary system could be removed to provide clearance for dedicated remediation equipment and piping components needed to expand the remedial response site-wide. However, the upgraded remediation infrastructure was never installed, due to the property owner's refusal to grant reasonable access since acquiring the property in April 2013.
- e. In May 2013, interim HVDPE was initiated to mitigate hydrocarbon-impacted soil and groundwater beneath the United and/or Rapid Gas facility and immediately downgradient of the Lube & Tune facility. Extraction was focused on a subset of the most impacted Site wells, generally limited to those containing significant measurable free product. As a result of these measures, an estimated total of 170,271 pounds of hydrocarbon mass was removed from subsurface soils and more than 436,270 gallons of contaminated groundwater were recovered for treatment and discharged to the sanitary sewer. Including the initial corrective action efforts (e.g. vapor extraction/air-sparging) performed between February 2012 and January 2013, the cumulative hydrocarbon mass removed from beneath the facility and immediate vicinity to date has been estimated at nearly 178,950 pounds. Despite the substantial volume recovered during the most recent 20 months of operation (through December 2014), remediation data collected just prior to shutdown indicated that soil and groundwater beneath the 6000 and 6020 Arlington Avenue parcels remained heavily-impacted. A fixed-based vapor extraction unit was recently re-installed. The upgraded system utilizes the existing vapor extraction well network and piping manifold to perform vadose zone remediation of hydrocarbon-impacted soils beneath the 6020 Arlington Avenue property and adjacent 6000 Arlington Avenue parcel. To date, no comprehensive corrective action response for remediation of contaminated

groundwater has been proposed and counsel for Rapid Gas has suggested that any such effort be delayed/postponed indefinitely, pending its effort to remove free product from Site wells and cost-sharing/allocation of resources by the other Responsible Parties.

f. The scope of corrective action measures employed (individually and jointly) to mitigate Site releases has proven to be piecemeal and significantly under-scaled when considered in relation to (1) the magnitude and extent of hydrocarbon contamination shown to be present, and (2) proximity of overlying commercial structures and nearby sensitive receptors, including the elementary school and private residences. Current conditions warrant a **comprehensive remedial response**, designed to mitigate the full expanse of Site contamination located beneath both service station footprints, as well as the adjacent streets, public right-of-ways and surrounding properties.

f.

**7. Water Quality Standards:** The Site overlies the Arlington Groundwater Management Zone (801.26), which has been designated for beneficial uses that include: (1) Municipal and domestic supply (MUN), (2) Agricultural supply (AGR), (3) Industrial service supply (IND) and (4) Industrial process supply (PROC).

The Santa Ana Regional Water Quality Control Board's Water Quality Control Plan (Basin Plan) establishes water quality objectives (WQOs)<sup>3</sup> for chemical constituents, to help ensure the protection of groundwater resources in accordance with designated beneficial uses. The Basin Plan further states, "All waters of the region shall be maintained free of substances in concentrations which are toxic, or that produce detrimental physiological responses in human, plant, animal or aquatic life." The primary maximum contaminant levels (MCLs)<sup>4</sup> established by the California Department of Health Services in Title 22 of the California Code of Regulations are considered protective of the most sensitive beneficial use (e.g. MUN). As a result of Site releases discussed herein, groundwater in the vicinity has been significantly impacted and impaired by petroleum hydrocarbon compounds, including but not limited to BTEX, as well as fuel oxygenates MtBE and TBA, at concentrations which are not consistent with the levels of water quality needed to support beneficial use designations established in the Basin Plan.

a. In October 2014, a subset of the Site monitoring wells were gauged and sampled to determine current site conditions. Gasoline free product was reported in nineteen of the monitoring points, at thicknesses up to 2.07 feet. It should also be noted that wells located on the former E-Z Serve property, many of which historically contained the most significant amounts of product, could not be inspected due to

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<sup>3</sup> "Water quality objectives" are defined in Water Code section 13050(h) as "the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses of water or the prevention of nuisance within a specific area."

<sup>4</sup> MCLs, maximum contaminant levels, are public health-protective drinking water standards to be met by public water systems. MCLs take into account not only chemicals' health risks but also factors such as their delectability and treatability, as well as the costs of treatment. Primary MCLs can be found in California Code of Regulations, Title 22, sections 64431 - 64444. Secondary MCLs address the taste, odor, or appearance of drinking water, and are found in California Code of Regulations, Title 22, section 64449.

ongoing access issues. A review of current and historical plume monitoring data indicates that the commingled LPH gasoline plume extends as far north as Site wells MW-1R and MW-14, as far west as EZ-11, EZ-17 and EZ-18, to the east as far as MW-10 and downgradient of the site to the south and southeast as far as EZ-6, EZ-9 and MW-17. The extent of the contamination to the west remains unknown. Based on data generated from peripheral Site wells, the extent of dissolved-phase hydrocarbon impacts encompasses an even larger area that extends in nearly all directions, but which has not yet been adequately delineated.

- b. The table below shows the maximum contaminant concentrations of the most prevalent petroleum hydrocarbon constituents reported in monitoring wells where LPH was not present and groundwater samples were collected and quantified for dissolved-phase hydrocarbon constituents during the October 2014 monitoring and sampling event, accompanied by WQOs for each of these respective chemicals.

Constituent	Maximum Concentration (µg/L)	Water Quality Objectives (µg/L)
TPH as gasoline (TPH-G)	137,000	5 <sup>1</sup>
Benzene	7,800	1 <sup>2</sup>
Toluene	21,000	40 <sup>3</sup>
Ethyl benzene	8,300	30 <sup>3</sup>
Xylenes	59,000	20 <sup>3</sup>
Methyl Tertiary Butyl Ether (MtBE)	430	5 <sup>4</sup>
Tertiary butyl alcohol (TBA)	4,100	12 <sup>5</sup>

1- USEPA Health Advisory 2- California Primary MCL 3- USEPA Secondary MCL 4- California Secondary MCL  
 5 - California State Notification Level and Response Level for Drinking Water.

- c. The above impacts to groundwater at, beneath, and emanating from the Site represent a significant impairment of groundwater resources and do not conform to the levels of water quality needed to support current and/or future uses of the groundwater resource, thereby creating a condition of pollution and nuisance in waters of the State, as defined by Water Code sections 13050(l) and (m).

**8. Potential Human Health Exposure Risk:** Based on the magnitude and widespread distribution of soil and groundwater contamination and presence of gasoline free product/LPH present beneath the Site and off-Site contaminant migration of elevated dissolved-phase and LPH beneath adjacent residences and school property, the Site contamination may pose a human health risk to surface occupants of existing on-Site buildings, and adjacent or downgradient structures and residences overlying the Site plume, as a result of volatilization of contaminant vapors into the indoor air.

- a. Several phases of soil gas testing have been performed to evaluate the potential human health exposure risk posed to occupants and patrons of the commercial shopping center situated over the former E-Z Serve footprint (6050 Arlington Property), and residences located east and west of Adams Avenue, at 8310 Colorado Avenue and 4580 Adams Avenue, as well as 8293, 8294 and 8283 San Vicente Avenue. Vapor samples collected from 5-foot and 10-foot probes on the former E-Z Serve station exceeded the commercial California Human Health Screening Levels (CHHSL) of 0.28 µg/L, with benzene concentrations reported as high as 12.0 µg/L. Soil gas samples collected in Colorado Avenue revealed elevated benzene and ethyl benzene at the 20-foot depth, but were non-detect at shallower depth intervals. Vapor samples collected from probes fronting residences along San Vicente Avenue revealed very high benzene, ethyl benzene and/or naphthalene concentrations at the 10-foot, 15-foot and 20-foot depth intervals, which were generally accompanied by lower or non-detect hydrocarbon concentrations in the corresponding samples collected at 5 feet bgs. However, benzene and/or ethyl benzene were reported at levels above the residential CHHSLs of .085 µg/L and 1.10 µg/L, in 5-foot samples collected at several locations. Benzene and ethyl benzene were reported at 0.56 µg/L and 5.38 µg/L in VP-8, fronting the 8283 San Vicente Avenue address. Additionally, benzene and ethyl benzene were detected at concentrations as high as 3.84 µg/L and 21.68 µg/L, respectively, in 5-foot soil gas samples collected from VP-9 and VP-10, located on the 8293 San Vicente Avenue residence. Subsequent soil gas testing performed at these locations along San Vicente Avenue resulted in conflicting data that showed low or non-detect levels in the shallow subsurface, which raised concerns about sample variability that prevented any definitive conclusions from being drawn regarding the actual threat to residents.
- b. Based on the above soil gas testing, Site contamination in unmitigated source areas associated with the former E-Z Serve station footprint may pose an imminent vapor intrusion risk to occupants of the overlying commercial businesses in the eastern portion of the shopping center property. Shallow soil vapor samples collected from three locations along San Vicente Avenue suggest that hydrocarbon vapors volatilizing upward from the heavily-impacted water table below cannot yet be ruled out as a potential human health exposure concern for residents overlying high dissolved-phase hydrocarbon and/or gasoline free product plumes. It should also be noted that no soil gas testing has been conducted to evaluate the potential human health exposure risk to the workers of the operating gasoline service station (Low Threat Cleanup Policy exemption) or the adjacent Lube & Tune repair facility. The contrasting data generated from soil vapor test performed to date represent an unacceptable uncertainty regarding the risk posed by Site contamination. As such, routine soil gas testing must be conducted to determine the long-term risk posed by Site contamination and ensure public safety.

## LEGAL AND REGULATORY AUTHORITY

9. This Order conforms to and implements (1) policies and requirements of the Porter-Cologne Water Quality Control Act (Division 7, commencing with Water Code section

13000), including sections 13267 and 13304; ~~(2) applicable State regulations, including Title 23 (UST Regulations) of the California Code of Regulations and the Health and Safety Code section 25296.10;~~ (32) applicable provisions of Statewide Water Quality Control Plans adopted by the State Water Resources Control Board (State Board) and the *Water Quality Control Plan, Santa Ana River Basin* (Basin Plan) adopted by the Regional Board including beneficial uses, water quality objectives, and implementation plans; (43) State Board policies and regulations, including State Board Resolution No. 68-16 (*Statement of Policy with Respect to Maintaining High Quality of Waters in California*), Resolution No. 88-63 (*Sources of Drinking Water*), and Resolution No. 92-49 (*Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under California Water Code Section 13304*); and (54) relevant standards, criteria, and advisories adopted by other State and federal agencies.

**10. Basis for Cleanup and Abatement Order:** ~~Water Code section 13304 and Health and Safety Code section 25296.10 contain the cleanup and abatement authority that allows the Regional Board to require a person to clean up waste and/or abate the effects of the waste discharge if ordered by a Regional Board to do so, in the event of a discharge in violation of waste discharge requirements, or if a person has caused or permitted waste to be discharged or deposited where it is or probably will be discharged into the waters of the State, and creates or threatens to create a condition of pollution or nuisance. Based on the findings above 1 through 8, the Responsible Parties Dischargers are subject to this Order because they have caused or permitted waste to be discharged or deposited where it has discharged to waters of the state and created a condition of pollution or nuisance. As such, the Regional Board is authorized to order RPMS; United and affiliate Rapid Gas; the J and R Wong Limited Family Partnership—II, LP; 6160 Arlington Ave., LLC; My Montecito Inc., SH and CF PropCo, to cleanup and abate the effects of the discharges pursuant to Water Code section 13304. Additional regulatory authority is granted pursuant to provisions of Health and Safety Code section 25296.10, which provides that each owner, operator, or other responsible party must take corrective action in response to an unauthorized release.~~

**11. Designation of Responsible Parties:** ~~Water Code section 13304 and California Code of Regulation, Title 23 (UST Regulations), section 2720, defines who may be considered a “responsible party” for purposes of establishing liability associated with the cleanup of contamination resulting from leaks from underground storage tanks and further stipulates that responsible parties must comply with all California Water Code provisions, as well as any other Orders issued by a Regional Water Quality Control Board, when an unauthorized release from an underground storage tank has occurred.~~

**12.11. Need and Basis for Requiring Technical Reports:** Water Code section 13267 provides that the Regional Board may require ~~Responsible Parties dischargers~~, past ~~Responsible Parties dischargers~~, or suspected ~~Responsible Parties dischargers~~ to furnish those technical or monitoring reports as the Regional Board may specify, provided that the burden, including costs, of these reports, shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring the reports, the Regional Board must provide the person with a written explanation with regard to the need for the reports, and identify the evidence that supports requiring that person to provide the reports. The technical reports required by this Order are needed to provide information to the Regional Board regarding (a) the nature and extent of unauthorized releases, (b) degree of pollution and nuisance caused to State waters, and (c)

the threat Site contamination may pose to members of the public who work or reside in structures overlying the contaminant plume. These reports will enable the Regional Board to determine the magnitude and distribution of contaminants on and in the vicinity of the Site, evaluate public safety, and ascertain what cleanup and abatement measures are required to bring the Site into compliance with applicable water quality objectives. Based on the nature and possible consequences of the discharges described in ~~the Ffindings No. 1 through 8~~ above, the burden of providing the required reports bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.

Pursuant to California Code of Regulations, title 23, sections 3890-3895, responsible parties must submit electronic laboratory analytical data (i.e. soil, soil gas/vapor, or water chemical analyses) and locational data (i.e. longitude/latitude coordinates and surface elevation of site monitoring wells), and other data generated in conjunction with environmental cleanups, to the State Geotracker database. Additional information regarding requirements pertaining to the electronic submission of data can be found at <http://geotracker.waterboards.ca.gov>.

**13.12. Cost Recovery:** Pursuant to California Water Code section 13304, the Regional Board is entitled to, and will seek reimbursement for, all reasonable costs actually incurred by the Regional Board to investigate unauthorized discharges of waste and oversee cleanup of such waste, abatement of the effects thereof, or other action required by this Order.

**14.13. State Board Policies:** The State Board adopted Resolution No. 92-49, the *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304*. This Resolution sets forth the policies and procedures to be used during an investigation or cleanup of a nuisance and requires that cleanup levels be consistent with State Board Resolution No. 68-16, the *Statement of Policy with Respect to Maintaining High Quality of Waters in California*. Resolution No. 92-49 and the Basin Plan establish the cleanup levels to be achieved. Resolution No. 92-49 requires the waste to be cleaned up to background, or if that is not reasonable, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with California Code of Regulations, Title 23, section 2550.4. Any alternative cleanup level greater than background must (1) be consistent with the maximum benefit for the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Board.

**15.14. California Environmental Quality Act (CEQA) Compliance:** The issuance of this Order is an enforcement action taken by a regulatory agency and is categorically exempt from the provisions of CEQA pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. Implementation of the required testing, assessment, monitoring and corrective action activities outlined by this Order are considered to be minor actions performed to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of hazardous wastes and substances, and therefore generally be exempt pursuant to California Code of Regulations, Title 14, section 15330. Nevertheless, the exact scope of activities required by this Order has not yet been fully determined and implementation of the corrective action efforts may ultimately result in significant physical impacts that require evaluation under CEQA. If the Regional Board determines that implementation of any plan required by this Cleanup and Abatement

Order will have a significant effect on the environment, the Regional Board will conduct the necessary and appropriate environmental review prior to the Executive Officer's approval of the applicable plan.

The ~~Responsible Party~~Dischargers will bear the costs, including the Regional Board's costs, of determining whether implementation of any plan required by this Cleanup and Abatement Order will have a significant effect on the environment and, if so, in preparing and handling any documents necessary for environmental review. If necessary, the ~~Responsible Party~~Dischargers and a consultant acceptable to the Regional Board shall enter into a memorandum of understanding with the Regional Board regarding such costs prior to undertaking any environmental review.

~~16.1. Qualified Professionals: In accordance with California Business and Professions Code sections 6735, 7835, and 7835.1, all site investigations and corrective action activities required by this Order shall be performed by qualified professionals, that are licensed where applicable, and competent and proficient in the fields pertinent to the activities performed; and technical reports containing engineering and geologic evaluations and judgments, shall be prepared by, or under the direction of a registered professional engineer or geologist.~~

~~17. For purposes of this order, the Responsible Parties~~Dischargers~~, or their authorized representative must certify under penalty of law, that they have examined and are familiar with the reports and, to the best of their knowledge, believe them to be true, complete and accurate. To this end, the following signed certification shall be included with all reports submitted pursuant to this Order:~~

~~I certify under penalty of perjury under the laws of the State of California that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.~~

## REQUIRED ACTIONS

IT IS **HEREBY ORDERED** that, pursuant to Water Code sections 13267 and 13304 ~~and Health and Safety Code section 25296.10~~, RPMS; United; Rapid Gas; ~~the J and R Wong Family Limited Partnership — II, LP; 6160 Arlington Ave., LLC;~~ My Montecito Inc., SH and CF PropCo shall comply with the following Directives cleanup and abate the Site in accordance with the scope and schedule set forth below.:

1. **Site Access:** Within **30 days of adoption of this Order**, the ~~Responsible Parties~~Dischargers identified herein shall agree to reasonable terms for Site access by the other ~~Responsible Parties~~Dischargers or their authorized representatives, to any parcels or properties affected by Site contamination that are under their control, as necessary to conduct investigations and cleanup activities required by this Order. Additionally, the

~~Responsible Parties~~ Dischargers shall continue to permit Site entry to their properties as needed to allow for unimpeded implementation of actions required by this Order, until such property access is no longer deemed necessary or warranted by the Executive Officer.

2. **Defining Contaminant Plume:** Submit a work plan and proposed schedule, within **90 days of adoption of this Order**, for conducting groundwater investigations to fully delineate the lateral and vertical boundaries of the groundwater contaminant plume. The work plan shall be subject to the approval of the Executive Officer. After approval of the work plan, conduct all field work necessary to define the extent of the groundwater contaminant plume, as directed by the Executive Officer, until the extent of the plume is fully delineated.
3. **Remedial Action Plan:** Based upon the results of item 2 above, the ~~Responsible Parties~~ Dischargers shall prepare and submit a comprehensive remedial action plan (RAP), with a proposed time schedule, that is sufficiently-scaled in scope to abate the expanse of Site contamination attributed to both UST system releases, and meets basic project objectives to mitigate source-area soil and groundwater contamination beneath the respective Site parcels and remediate the commingled groundwater plume consisting of both LPH and dissolved-phase impacts, such that further off-site and downgradient migration of contaminants by groundwater transport is prevented. Upon Regional Board approval of the RAP, the ~~Responsible Parties~~ Dischargers shall implement the comprehensive RAP in accordance with the time schedule approved by the Executive Officer.
4. **Quarterly Groundwater Monitoring and Reporting:** ~~Upon adoption of this Order,~~ perform ongoing quarterly groundwater monitoring and sampling necessary to characterize site conditions and gauge the effectiveness of the corrective action measures with respect to both reduction of contaminant concentrations and plume containment. These activities shall initially include, but are not limited to, conducting monthly groundwater gauging and measuring of free product thicknesses in all Site wells, as well as semi-annual sampling and analysis of the dissolved-phase plume constituents in existing Site monitoring wells, but may in the future be conducted in accordance with a modified scope and schedule, if approved in writing by the Executive Officer.

For the following quarterly groundwater monitoring periods, submit the monitoring reports by the specified due date:

<b>Groundwater Monitoring Period</b>	<b>Report Due Date</b>
January to March	April 15
April to June	July 15
July to September	October 15
October to December	January 15

5. **Soil Gas Testing:** Within **30 days of adoption of this Order**, submit a proposed scope and schedule for routine soil gas testing of existing vapor probes to provide an updateable survey of subsurface conditions over time and generate the necessary analytical data required to quantify the human health exposure risk posed by Site contaminants and evaluate the vapor intrusion threat to occupants of numerous residential and commercial structures overlying the Site contamination. In this proposal, include any new vapor probes you expect to install, when you expect to install them, and their location relative to the Site.

Upon receiving approval from the Executive Officer, the program of routine soil gas testing shall be initiated within 60 days, and continuously implemented in accordance with the established schedule, until such time as the Site contamination has been demonstrated to be adequately mitigated to the degree that further testing is no longer deemed necessary or warranted, as determined by the Executive Officer.

6. **Quarterly Progress Reports:** ~~C. Upon adoption of this Order,~~ conduct the necessary ongoing remediation activities as described above and approved by the Executive Officer, and submit quarterly progress reports to the Executive Officer, regarding the Site remediation activities, groundwater plume monitoring data and soil gas test results generated in conjunction with items 2 through 5 (above) generated during the reporting period. The quarterly progress reports must include a detailed discussion regarding all testing and data collected during the period, and the relative effectiveness of the remediation efforts, along with recommendations for any additional assessment or testing needed to characterize or delineate Site contamination.
7. **If Revised RAP is Necessary:** In the event that the corrective action efforts are determined by the Executive Officer to be inadequate, the ~~Responsible Parties~~ ~~Dischargers~~ shall submit a revised RAP within 60 days of being notified of such a determination, to propose a revised corrective action strategy capable of achieving the remedial objectives for remediation of contaminated soil, groundwater and/or abatement of soil vapor emissions for protection of human health, as set forth by the Executive Officer. Upon approval, the revised RAP shall be implemented in accordance with deadlines set forth by the Executive Officer.
8. **Qualified Professionals:** In accordance with California Business and Professions Code sections 6735, 7835, and 7835.1, all site investigations and corrective action activities required by this Order shall be performed by qualified professionals, that are licensed where applicable, and competent and proficient in the fields pertinent to the activities performed; and technical reports containing engineering and geologic evaluations and judgments, shall be prepared by, or under the direction of a registered professional engineer or geologist.
9. For purposes of this order, the Dischargers, or their authorized representative must certify under penalty of law, that they have examined and are familiar with the reports and, to the best of their knowledge, believe them to be true, complete and accurate. To this end, the following signed certification shall be included with all reports submitted pursuant to this Order:  
  

*I certify under penalty of perjury under the laws of the State of California that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

7. \_\_\_\_\_

9. All references to the Executive Officer in this Order shall include his/~~her~~ delegate.
10. Failure to comply with requirements of this Order may subject the Responsible Parties to further enforcement action, including but not limited to: imposition of administrative civil liability, pursuant to Water Code sections 13268 and 13350, in an amount not to exceed \$1,000 and \$5,000, respectively, for each day in which the violation occurs under Water Code sections 13304 or 13350, or the Regional Board may refer the matter to the Attorney General for injunctive relief or civil or criminal liability.
11. Any person affected by this action of the Regional Board may petition the State Board to review the action in accordance with section 13320 of the Water Code and California Code of Regulations, Title 23, section 2050. The petition must be received by the State Board, Office of Chief Counsel, (P.O. Box 100, Sacramento, California 95812), within 30 days of the date of this Order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

I, Kurt V. Berchtold, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Santa Ana Region, on ~~December 11, 2015~~June 10, 2016.

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Kurt V. Berchtold  
Executive Officer

**STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SANTA ANA REGION**

**DRAFT CLEANUP AND ABATEMENT ORDER NO. R8-2015-0038**

**FOR  
RESTRUCTURE PETROLEUM MARKETING SERVICES OF CALIFORNIA, INC.  
UNITED EL SEGUNDO, INC.  
RAPID GAS, INC.  
J. AND R. WONG FAMILY LIMITED PARTNERSHIP – II L.P.  
6160 ARLINGTON AVE., LLC  
MY MOTECETO INC SH  
CF UNITED PROPCO LLC**

**6020 ARLINGTON AVENUE  
6050 ARLINGTON AVENUE  
CITY OF RIVERSIDE**

**RAPID GAS, INC., UNITED EL SEGUNDO, INC. AND CF UNITED PROPCO LLC  
LEGAL AND TECHNICAL ANALYSIS  
OPPOSING DRAFT CLEANUP AND ABATEMENT ORDER NO. R8-2015-0038**

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## **I. INTRODUCTION**

Potentially Responsible Parties Rapid Gas, Inc., United El Segundo, Inc. and CF United PropCo LLC submit the following legal and technical analysis in opposition to Draft Cleanup and Abatement Order No. R8-2015-0038 proposed by the Prosecution Team for issuance by the Regional Water Quality Control Board - Santa Ana Region (“Regional Board”).

At issue is whether seven parties should be made jointly and severally responsible for releases of gasoline at two separate sites. First, gasoline was released from an underground storage tank system at an ARCO-branded retail motor fuel facility formerly located on the southwest corner of Arlington Avenue and Adams Street at 6050 Arlington Avenue (“6050 Site”). Gasoline was also released from an underground storage tank system at a 76-branded retail motor fuel facility currently located on the southeast corner of Arlington Avenue and Adams Street at 6020 Arlington Avenue (“6020 Site”). Second, there are two groupings of parties potentially responsible for contamination caused by the releases at the 6050 Site and the 6020 Site. With regard to the 6050 Site, the potentially responsible parties are: (a) former operator Restructure Petroleum Marketing Services of California, Inc.; (b) current landowner My Montecito Inc SH; (c) former landowner 6160 Arlington Ave., LLC; and (d) former landowner J. and R. Wong Family Limited Partnership – II L.P. (collectively, the “6050 RPs”). With regard to the 6020 Site, the potentially responsible parties are: (a) former operator Rapid Gas, Inc.; (b) former landowner United El Segundo, Inc.; and (c) current landowner CF United PropCo LLC (collectively, the “6020 RPs”).

The 6020 RPs make four contentions. First, it is inappropriate to issue a cleanup and abatement order against the 6020 RPs when for more than fifteen years Rapid Gas, Inc. has complied with Regional Board directives. Second, it is inappropriate to impose joint and several liability against the 6050 RPs and the 6020 RPs when the petroleum hydrocarbon plume resulting from gasoline releases at the 6050 Site and 6020 Site are reasonably susceptible of division. Third, issuance of Cleanup and Abatement Order No. R8-2015-0038 to the 6050 RPs and the 6020 RPs collectively without any division of responsibility is counterproductive and will not accomplish the goal of cleanup. Fourth, if the Regional Board decides to issue Cleanup and Abatement Order No. R8-2015-0035, CF United PropCo should be made secondarily responsible for the 6020 Site.

## **II. CORRECTIVE ACTION COMPLIANCE**

### **a. Assessment of Petroleum Constituents in Soil and Groundwater**

Rapid Gas, Inc. has consistently performed corrective action to assess the release of gasoline from underground storage tanks (“USTs”) operated at the 6020 Site prior to November 2002 as required by the Regional Board.

Regional Board staff initially requested a workplan for site assessment by letter dated April 17, 1998. Atlas Environmental Engineering, Inc. (“Atlas”) submitted a Work Plan for Preliminary Site Investigation dated June 5, 1998. The Regional Board approved the Work Plan by letter

dated July 14, 1998. A preliminary assessment was performed in October 1998. Monitoring wells MW-1, MW-2 and MW-3 were installed on the 6020 Site. 1

The Regional Board requested additional site assessment by letter dated March 1, 1999. Atlas prepared a Workplan for Additional Site Investigation dated March 30, 1999. The Regional Board approved the Workplan by letters dated July 20, 1999 and August 17, 1999. A soil and groundwater investigation was performed in December 1999. Monitoring well MW-4 was installed off-site north of Arlington Avenue on the southeast corner of Arlington Avenue and Urban Street. MW-7 was installed on the 6050 Site and MW-6 and MW-8 were installed at 6000 Arlington Avenue. 2

Atlas installed three groundwater monitoring wells on December 5, 2001 and March 1, 2002. MW-5 was installed in Morningside Drive north of Arlington Avenue and east of a Shell-branded retail motor fuel facility formerly located at 5995 Arlington Avenue. Monitoring well MW-9 was installed on the northeast corner of 6000 Arlington Avenue. MW-10 was installed southeast of the 6020 Site in San Vicente Avenue. 3

Atlas installed two groundwater monitoring wells on October 2, 2002. Monitoring well MW-11 was installed southeast of the 6020 Site in Brunswick Avenue. MW-12 was installed east of the 6020 Site in Arlington Avenue. 4

The USTs at the 6020 Site were removed in November 2002. Soil samples were collected from the UST excavation and beneath the dispenser islands. 5

Additional assessment was performed by The Source Group, Inc. ("SGI") on behalf of Rapid Gas, Inc. in September and October 2004. Monitoring well MW-3 was abandoned because it was dry and MW-3A was installed. Thirteen dual-nested recovery wells (RW-1 through RW-13) and thirteen air sparge wells (AS-1 through AS-13) were installed at the 6020 Site and 6000 Arlington Avenue. 6

Additional assessment was performed by SGI in November 2005. Four groundwater monitoring wells were installed. Monitoring wells MW-13 and MW-14 were installed north of the 6050 Site in Arlington Avenue. Monitoring wells MW-15 and MW-16 were installed in Adams Street. 7

Regional Board staff required additional assessment by letters dated March 17, 2006 and June 29, 2006. SGI installed four groundwater monitoring wells in September 2006. Monitoring well MW-17 was installed in San Vicente Avenue east of Adams Street. Monitoring well MW-18 was installed in San Vicente Avenue east of MW-17. Monitoring wells MW-19 and MW-20 were installed at 6000 Arlington Avenue. 8

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1 See Prosecution Team Exhibit 18.

2 See Prosecution Team Exhibit 19.

3 See Prosecution Team Exhibit 22.

4 See Prosecution Team Exhibit 23.

5 See Prosecution Team Exhibit 3.

6 See Prosecution Team Exhibit 24.

7 See Prosecution Team Exhibit 25.

8 See Prosecution Team Exhibit 26.

SGI performed a subsurface investigation at 5995 Arlington Avenue in March 2008. Eight borings were drilled and soil and groundwater samples were collected. SGI concluded that a gasoline release had occurred at the former Shell station impacting groundwater in MW-5. 9

SGI issued a Well Replacement Work Plan dated May 5, 2008. Work was performed on August 20, 2008. SGI installed RW-1A and RW-3R. SGI issued a Remediation Well Replacement Report dated September 23, 2008.

The State Water Resources Control Board adopted Resolution No. 2009-0042 on May 19, 2009. Resolution No. 2009-0042 established a policy favoring semi-annual groundwater monitoring. Notwithstanding Resolution No. 2009-0042, the Regional Board required quarterly groundwater monitoring by letter dated July 30, 2009.

GeoEnviro Services, Inc. ("GESI") was engaged as a joint consultant for Rapid Gas, Inc. and Restructure Petroleum Marketing Services of California pursuant to a Commingled Plume Application in or about 2009.

GESI performed additional site investigation activities in March 2012, including, but not limited to, installation of one groundwater monitoring well (MW-21) in San Vicente Avenue. GESI also contacted the City of Riverside Public Utilities Department in November 2011, to determine whether groundwater wells utilized for water production are located nearby the 6050 Site and the 6020 Site. According to Thomas Corrigan of the Riverside Public Utilities Department, there are no active groundwater production wells located within a 1-map radius of the 6050 Site and the 6020 Site. There are four inactive production wells located approximately 1-mile southwest of the 6050 Site identified as Army 1 and 3 and Iselin 1 and 2. According to City records, no groundwater production has occurred from these wells since at least 1983, and there are no plans to utilize these wells in the future. 10

GESI performed additional site investigation activities in August 2012, including, but not limited to, installation of one groundwater monitoring well (MW-22) in Brunswick Avenue. 11

GESI performed additional site investigation activities in January 2014, including, but not limited to, installation of one groundwater monitoring well (MW-23) in the northeast portion of 6000 Arlington Blvd. 12

The 6020 RPs contend that the extents of soil and groundwater from the release(s) at the 6020 Site have been fully assessed. Groundwater monitoring was conducted in June 2015. 13 It is noteworthy that although LPH continues to be present at the 6020 Site, the highest concentrations of benzene and MTBE in wells outside the former source areas that do not contain LPH were 350 µg/L and 11µg/L, respectively. Note also the affected groundwater is not currently being used as

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9 See Prosecution Team Exhibit 28.

10 See Prosecution Team Exhibit 56 (Appendix B)

11 See Prosecution Team Exhibit 57

12 See Prosecution Team Exhibit 58

13 See 6020 RPs Exhibit 5.

a source of drinking water.

**b. Remediation Performed at the 6020 Site**

Following UST and dispenser removal in November and December 2002, limited excavation of petroleum hydrocarbon impacted soil in areas at the northwest side of the former UST complex and fuel dispenser islands was conducted. The complete removal of the petroleum hydrocarbon impacted soil in the area of the former UST complex could not be accomplished due to the increased TPHg concentrations detected with depth. However, the complete removal of the petroleum hydrocarbon impacted soil beneath both fuel dispenser island areas was successful. The excavation extended to depths of approximately 7 to 10 feet below ground surface (bgs). A total of approximately 1,100 tons of petroleum hydrocarbon impacted soil was excavated and transported off-site for disposal. 14

In July 2005, SGI commenced operation of a soil vapor extraction (SVE) system equipped with a thermal/catalytic oxidizer for SVE treatment. The SVE system operated in thermal mode until it was switched to catalytic mode in October 2006. In August 2008, the Thermal/Catalytic oxidizer was replaced with a granular activated carbon (GAC) SVE system. SGI operated the SVE/GAC system through March 18, 2009, when the system was turned off. The SVE system reportedly operated for 17,797 hours and removed approximately 21,766 pounds of hydrocarbon mass. 15

ATLAS re-started the SVE/GAC system on May 9, 2009, and operated the system through the end of the third quarter of 2011. A total of approximately 44,610 pounds of volatile petroleum hydrocarbons was estimated to have been removed by the soil vapor extraction remediation conducted at the 6020 Site.16

Air sparging and high concentration oxygen injection using ISOC technology was conducted periodically between July 2005 and the third quarter of 2011 by Atlas and SGI. 17 It is unknown whether air sparging caused lateral disbursement of hydrocarbons in groundwater.

On February 6, 2012, GESI re-started the SVE/GAC system. 18 GESI continued operation of the SVE/GAC system through January 31, 2013, when the SVE/GAC system was turned off. A total of approximately 14,068 pounds of volatile petroleum hydrocarbons was estimated by GESI to have been removed by the SVE/GAC system between February 6, 2012 and January 31, 2013. 19

On May 9, 2013, CalClean, Inc., under subcontract to GESI, started a high vacuum dual-phase extraction (HVDPE) system equipped with a 20 horsepower (HP) liquid ring pump (LRP) and downhole drop tubes/stingers in individual extraction wells to allow for simultaneous extraction of soil vapor and groundwater from extraction wells. The HVDPE system initially only extracted soil vapor from extraction wells through July 15, 2013. Following receipt of a sewer discharge

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14 See Prosecution Team Exhibit 3.

15 See 6020 RPs Exhibit 6.

16 See Prosecution Team Exhibits 33 & 62.

17 See Prosecution Team Exhibit 30.

18 See Prosecution Team Exhibit 33.

19 See Prosecution Team Exhibits 64 and 67.

permit on July 15, 2013, the HVDPE system started extracting soil vapor and groundwater. The 20 HP LRP failed between September 12 and 19, 2013, and was subsequently replaced with a 25-HP LRP. The HVDPE system was re-started with the new LRP on October 29, 2013, and was operated through December 30, 2014 when HVDPE remediation was terminated. GESI reported that approximately 120,271 pounds of petroleum hydrocarbons were removed. Additionally, GESI reported that a total of 436,270 gallons of groundwater was extracted by the HVDPE system between July 15, 2013 and December 30, 2014. 20

Liquid phase hydrocarbon (“LPH”) monitoring and removal by manual bailing was historically conducted periodically by Atlas and SGI between 2005 and 2009. Approximately weekly LPH monitoring and removal using manual bailing techniques was performed by GESI between approximately 2010 and 2014. LPH removal in off-site wells in Adams Street using a vacuum truck was performed by GESI approximately monthly between July 2012 and July 2014. 21

FREY Environmental, Inc. (“FREY”) was engaged by Rapid Gas, Inc. to perform environmental corrective action in late 2014. FREY initiated approximately weekly LPH monitoring and removal activities using a combination of manual bailing and passive free product skimmers in on-site wells and off-site well MW-17 in January 2015. Automatic skimmers were installed in selected on-site wells by FREY in March 2015. FREY additionally initiated approximately monthly LPH monitoring and removal activities for off-site wells located in Adams Street on May 2, 2015, as an accommodation to the Regional Board and with the understanding that Rapid Gas, Inc. believes the source of LPH in monitoring wells in Adams Street is the 6050 Site.

A replacement vapor extraction system (VES) was installed by FREY and connected to wells on the 6020 Site and 6000 Arlington Avenue. Operation of the VES commenced on August 6, 2015 and has continuously operated during the past three months. 22

**c. Meetings with Regional Board Staff**

Counsel and consultants representing Rapid Gas, Inc. and United El Segundo, Inc. have attended countless meetings with Regional Board staff at the offices of the Regional Board in Riverside to discuss necessary and appropriate corrective action. The 6020 RPs believe that Regional Board staff and the 6020 RPs were working cooperatively until funding from the UST Cleanup Fund was exhausted and certain of the 6050 RPs stopped attending meetings and declined to provide funding for corrective action. 23

**d. Commingled Plume Account Claim**

CalClean Inc., the supplier and operator of dual phase vapor extraction equipment, issued a letter

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20 See Prosecution Team Exhibits 59 and 66.

21 See Prosecution Team Exhibits 59 & 67.

22 See 6020 RPs Exhibit 6.

23 More specifically, counsel for former landowner J. and R. Wong Family Limited Partnership – II L.P. has been a regular attendee at Regional Board meetings. A representative of former landowner 6160 Arlington Ave., LLC was also a regular attendee until Regional Board staff expressed an intention to issue a cleanup and abatement order. Current landowner My Montecito Inc SH has been consistent in its refusal to attend meetings or allow access to the 6050 Site for assessment or remediation activities.

to Restructure Petroleum Marketing Services of California, Inc. and Rapid Gas, Inc. dated December 19, 2014, indicating that it intended to terminate remediation services effective December 31, 2014. 24 GESI issued a letter indicating that it intended to terminate its services on December 19, 2014. 25 The remediation equipment was removed by CalClean Inc. on December 30, 2014. GESI issued a Site Remediation Progress Report on January 15, 2015. 26

**e. Project Transition Following Exhaustion of Commingled Plume Account Funding**

In January 2015, Regional Board staff and counsel for the 6020 RPs exchanged email about the project status. By email sent on January 5, 2015, counsel for the 6020 RPs informed Regional Board staff that Rapid Gas, Inc. had retained FREY for performance of corrective action to address the release at the 6020 Site.

Counsel for the 6020 RPs and FREY met with Regional Board staff to discuss the project transition on January 22, 2015. FREY issued an email summarizing the meeting on January 23, 2015.

FREY issued an email to the Regional Board staff discussing ongoing corrective action on March 3, 2015 and March 16, 2015. Representatives of the 6020 RPs met with Regional Board staff on March 17, 2015. FREY issued an email summarizing the meeting on March 24, 2015.

FREY issued an email to the Regional Board staff discussing ongoing corrective action on April 20, 2015. Representatives of 6020 RPs met with Regional Board staff on April 21, 2015. FREY issued an email summarizing the meeting on April 24, 2015.

FREY issued an email to the Regional Board staff discussing ongoing corrective action on May 7, 2015 and June 3, 2015. Regional Board staff indicated that a monthly meeting would not be necessary by email sent on June 8, 2015. Counsel for the 6020 RPs sent an email to the Regional Board on June 11, 2015. A conference call with Regional Board staff, counsel for the 6020 RPs and FREY was held on June 17, 2015.

**III. APPORTIONMENT OF RESPONSIBILITY**

**a. Applicable Legal Standard**

There is no legal basis to compel current and former owners and operators of the 6020 Site to perform corrective action to address release(s) of gasoline at the 6050 Site. Imposition of joint and several liability is appropriate only where there is an indivisible harm.

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24 See 6020 RPs Exhibit 3.

25 See 6020 RPs Exhibit 4.

26 See Prosecution Team Exhibit 59.

Water Code § 13304(a) provides that:

Any person ... who has caused or permitted ... any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the Regional Board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.

A plain reading of Water Code § 13304 leads to the conclusion that the Regional Board does not have authority to compel the 6020 RPs to cleanup or abate the effects of pollution that the 6020 RPs did not cause or permit at and emanating from the 6050 Site.

The Prosecution Team cites two authorities for its position that all liability under Water Code § 13304 is “joint and several.”

The first authority cited by the Prosecution Team ( *In the Matter of Union Oil Company of California*, Order No. WQ-90-2) involved a hydrocarbon plume emanating from 235 Market Street in San Diego. The Regional Water Quality Control Board – San Diego Region issued Cleanup and Abatement Order No. 89-51 to Union Oil Company of California (“Union Oil”) as a former lessee and Golden West Hotel as the current owner of land upon which a release from USTs occurred causing groundwater contamination. The State Board dismissed without prejudice a petition for review filed by Union Oil and remanded Cleanup and Abatement Order No. 89-51 to the Regional Board for further fact finding given the number of potential sources of groundwater contamination. The State Board encouraged the Regional Board to issue one or several orders with coordinated tasks and time schedules to all persons it found legally liable. The State Board indicated that while it considers all dischargers jointly and severally liable for discharge of waste, the Regional Board should consider either a consolidated order or coordinated order to clearly define work to be done in a coordinated fashion. The State Board in footnote 6 indicated: “There may, of course, be tasks which are appropriately required only by the dischargers to an individual site. An example would be cleanup of contaminated soil below the site.”

The second authority cited by the Prosecution Team is a Memorandum from the Office of Chief Counsel of the State Board to the Executive Director of the State Board dated December 7, 2005. The Memorandum cites *In the Matter of Union Oil Company of California*, Order No. WQ-90-2 for the proposition that a landowner and operator of a dry cleaning facility are jointly and severally liable for a release of tetrachloroethene (“PCE”) from the site. The Memorandum is inapplicable to the issue of whether an owner or operator of USTs at one site is liable for contamination caused by dischargers at another site.

Water Code § 13304 does not contain any provision for joint and several liability. Moreover, the concept of apportionment of responsibility is expressly recognized in Health and Safety Code § 25363(a) which states:

Except as provided in subdivision (f), any party found liable for costs or expenditures recoverable under this chapter who establishes by a preponderance of the evidence that only a portion of those costs or expenditures are attributable to that party's action, shall be required to pay only for that portion.

The Hazardous Substance Account Act was, of course, modeled after the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The United States Supreme Court addressed the issue of joint and several liability under CERCLA for contamination at a site in Arvin, California in *Burlington Northern & Santa Fe Railway Company v. United States*, 556 U.S. 599, 613-15, 619 (2009). The Court held that imposition of joint and several liability is inappropriate, even where the harm created by contamination is singular, when a reasonable basis for apportionment exists.

**b. Joint and Several Liability is Inappropriate Here Because the Petroleum Hydrocarbons Emanating from the 6050 Site and 6020 Site are Reasonably Susceptible to Division.**

**i. Releases Occurred at Two Separate Sites**

It is undeniable that two separate releases occurred in this case. First, gasoline was released during the course of operating a retail motor fuel facility at the 6050 Site and possibly since then. Second, gasoline was released during the course of operating a retail motor fuel facility at the 6020 Site. While proximate to each other, the two sites are on separate corners of an intersection separated by Adams Street.

**ii. Responsibility for Soil Contamination is Reasonably Susceptible to Apportionment**

It is indisputable that soil contamination exists on both the 6050 Site and the 6020 Site. The soil contamination is separate and distinct. Joint and several liability for all soil contamination is inappropriate. It is illogical to make the 6020 RPs responsible for soil contamination at the 6050 Site and make the 6050 RPs responsible for soil contamination at the the 6020 Site when the vertical and lateral extent of the soil contamination is spatially separable. The 6050 RPs are liable for cleanup of soil contamination at the 6050 Site and the 6020 RPs are liable for cleanup of soil contamination at the 6020 Site.

**iii. Responsibility for On-Site Groundwater Contamination is Reasonably Susceptible to Apportionment**

It is indisputable that groundwater contamination exists beneath both the 6050 Site and beneath the 6020 Site. It is illogical to make all seven parties jointly liable for groundwater contamination beneath the 6050 Site and the 6020 Site when the groundwater contamination beneath each site is spatially separable. The 6050 RPs are liable for cleanup of groundwater contamination beneath the 6050 Site and the 6020 RPs are liable for cleanup of groundwater

contamination beneath the 6050 Site.

#### **iv. Responsibility for Off-Site Groundwater Contamination is Reasonably Susceptible to Apportionment**

While it is indisputable that off-site groundwater contamination exists south of Arlington Avenue, responsibility for the off-site groundwater contamination is reasonably susceptible to apportionment by determination of the direction of groundwater flow and forensic analysis of LPH. 27

##### **(a) The Direction Groundwater Flow is Southeast**

An extensive groundwater investigation has been conducted. Ten groundwater monitoring and extraction wells have been installed on the 6050 Site. Fourteen monitoring wells and extraction wells have been installed on the 6020 Site. Forty-three groundwater monitoring and extraction wells have been installed off-site. Quarterly groundwater monitoring of all accessible wells associated with both sites has been conducted since 2008. The direction of groundwater flow across the vicinity of the 6050 Site and the 6020 Site has been consistently southeast. 28

##### **(b) Forensic Investigation**

In 2010, Atlas conducted a forensic investigation of gasoline samples collected from monitoring wells MW-2 located on the 6020 Site, MW-7 located on the 6050 Site and MW-16 located in Adams Street, southeast and down gradient of the 6050 Site. The gasoline samples were analyzed by Zymax Forensics (“Zymax”). Zymax concluded that the product sample from MW-2 was distinguishable from the product samples from MW-7 and MW-16, and the product in the sample from MW-16 most resembled the key markers in the product in the sample from MW-2. On February 17, 2010, Atlas issued a Free Product Forensic Analysis Report to the Regional Board. 29

##### **(c) Regional Board Apportionment**

Regional Board staff itself has apportioned responsibility. On March 18, 2010, Regional Board staff issued a letter to United Oil Company concluding that based on the consistent southeast direction of groundwater flow and the forensic analysis: “Petroleum hydrocarbon contamination in groundwater wells MW-7 and MW-14 through MW-16 is being primarily attributed to the historical releases at the former EZ property, while responsibility for contamination east of Adams and beneath/adjacent the All Tune and Lube property and adjoining residential properties along San Vicente Avenue (including groundwater impacts in MW-17) is being assigned to United.” (emphasis added). 30

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27 See 6020 RPs Exhibit 7.

28 See Prosecution Team Exhibit 21, 52 & 61 and 6020 RPs Exhibit 7.

29 See Prosecution Team Exhibit 31.

30 See Prosecution Team Exhibit 32

Subsequent to the date on which Regional Board staff assigned responsibility for groundwater contamination in off-site groundwater monitoring wells MW-14, MW-15 and MW-16 to the 6050 Site, additional groundwater monitoring wells were installed in Adams Street. Groundwater monitoring wells EZ-6, EZ-7, EZ-12, EZ-13 and EZ-14 were installed in Adams Street in September 2010 (EZ-6)<sup>31</sup>, January 2011 (EZ-7)<sup>32</sup> and September 2011 (EZ-12, EZ-13 and EZ-14).<sup>33</sup> Logically, if Regional Board staff apportioned responsibility for MW-14, MW-15 and MW-16 to the 6050 Site, responsibility for wells EZ-6, EZ-7, EZ-12, EZ-13 and EZ-14 should similarly be assigned to the 6050 Site and consequently to the 6050 RPs.

Based on the foregoing, it is clear that responsibility for off-site groundwater contamination is reasonably capable of apportionment. The obvious division is that the 6050 Site and 6050 RPs are responsible for groundwater contamination beneath Adams Street and west thereof and the 6020 Site and 6020 RPs are responsible for groundwater contamination east of Adams Street. The 6020 RPs observe, however, that LPH was not detected in MW-17 slightly east of Adams Street in San Vicente Avenue from installation in November 2006 through January 2009. LPH was initially measured in July 2009. Based on the direction of groundwater flow and the proximity of MW-17 to MW-16, it is likely that the release from the 6050 Site is contributory to the LPH in MW-17.<sup>34</sup>

#### **(d) Primary Contaminant of Concern**

On May 1, 2012, the State Board adopted Resolution No. 2012-0016, the Low-Threat Underground Storage Tank Case Closure Policy (Low-Threat Policy). This policy, which is also a state policy for water quality control, provides standard closure criteria for petroleum UST cases. Resolution No. 92-49 governs all investigations and cleanups under Water Code § 13304. If a petroleum UST case does not meet the closure criteria in the Low-Threat Policy, regulatory agencies are required to consider case closure pursuant to State Board Resolution No. 92-49 Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304. Resolution No. 92-49 directs regional water boards to make reasonable efforts to identify the dischargers associated with the discharge. (State Water Board Resolution No. 92-49, § I.B). It also 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. (Id., § III.G). 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, however, that the requisite level of water quality be met at the time of site closure. Resolution No. 92-49 specifies compliance with cleanup goals and objectives within a reasonable time frame. (Id., § III.A.) Therefore, even if the requisite level of water quality has not yet been attained, a site may be closed if the level will be attained within a reasonable period.

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31 See Prosecution Team Exhibit 50

32 See Prosecution Team Exhibit 51

33 See Prosecution Team Exhibit 16

34 See Prosecution Team Exhibit 31 and 6020 RPs Exhibit 7.

As noted above, the 6020 Site is located more than one mile from any active water production well. While Draft Cleanup and Abatement Order No. R8-2015-0038 recites historic maximum concentrations of various gasoline constituents in groundwater, the current concentrations of all constituents are significantly lower based on remediation performed to date. Though LPH persists due to decreases in the depth to groundwater, the maximum concentrations of the listed constituents in monitoring wells associated with the 6020 Site that do not contain LPH are: TPH-G (8,900 µg/L) (RW-2); Benzene (350µg/L) (RW-2); Toluene (530 µg/L) (RW-2); Ethyl benzene (190 µg/L) (RW-2); Xylenes (1,090) (RW-2); MTBE (11µg/l) (RW-2); and TBA (11,000µg/l) (MW-6). MTBE and TBA were detected in only three groundwater monitoring wells. Thus, the primary objective for remediation of the release(s) from the 6020 Site is removal of LPH which will be achieved through LPH removal and ongoing vapor extraction. Clearly, the presence of limited oxygenates in groundwater is not driving the need for remediation.

#### **(e) Practical Considerations**

There are practical considerations for apportionment of responsibility. History has shown that the 6050 RPs and the 6020 RPs are incapable of working together. Rapid Gas, Inc. has since the initial discovery of contamination consistently cooperated in performing required corrective action. Rapid Gas, Inc. investigated potential sources of regional groundwater contamination by conducting public record searches and by drilling soil borings and installing groundwater monitoring wells at, in the vicinity of and down gradient from the 6050 Site and the former Shell site at 5995 Arlington Avenue. Rapid Gas, Inc. and United El Segundo, Inc. have attended all meetings called by Regional Board staff. Since funding from the Underground Storage Tank Cleanup Fund was exhausted in 2014, Rapid Gas, Inc. has singularly performed corrective action required by Regional Board at its own expense. <sup>35</sup> Rapid Gas, Inc. has on several occasions unsuccessfully attempted to engage the 6050 RPs in discussions to enter into a cost sharing agreement. Since there does not appear to be a reasonable prospect that the 6050 RPs will work cooperatively with the 6020 RPs, imposing obligations on the 6050 RPs and 6020 RPs collectively is a recipe for gridlock and inaction.

#### **(f) Secondary Liability**

If the Regional Board decides to issue Cleanup and Abatement Order No. R8-2015-0038, it should be modified to make CF United Propco LLC secondarily liable. The concept of secondary liability status has been recognized by the State Board. State Board orders have found secondary liability status appropriate where a discharger did not initiate or contribute to the discharge. See *In the Matter of Arthur Spitzer, Harvey Jack Muller and Betina Brendel, Spic & Span, Inc., et al.* Order No. WQ 89-8; *In the Matter of Vallco Park, Ltd.* Order No. 86-18. The State Board has also indicated such a finding is appropriate where a cleanup is proceeding well. *Wenwest, Inc., Susan Rose, Wendy's International, Inc. and Phillips Petroleum Company*, Order WQ 92-13; *In the Matter of Prudential Insurance Company of America*, Order No. WQ 87-6.

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<sup>35</sup> The environmental corrective action costs incurred by Rapid Gas, Inc. in 2015 exceed \$122,000.

CF United PropCo qualifies for secondary liability status. First, Draft Cleanup and Abatement Order No. R8-2015-0038 ¶ 3f. contains an express finding that “[t]here is no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent or in the downgradient Site vicinity are the result of releases or discharges stemming from business activities conducted since CF PropCo acquired the 6020 Arlington Avenue parcel from United and/or Rapid Gas.” Second, Rapid Gas, Inc. as a primarily responsible party has consistently complied with Regional Board directives for the past fifteen years.

### **(g) Required Actions**

Cleanup and Abatement Order No. R8-2015-0038 (Revised Draft) contains 11 required actions that should be allocated between the 6050 RPs and the 6020 RPs.

Item 2 requires that the 6050 RPs and the 6020 RPs submit a work plan for conducting groundwater investigations to fully delineate the lateral and vertical boundaries of the groundwater plume. The lateral extent of the groundwater plume emanating from the 6020 Site has been fully delineated. Groundwater monitoring was conducted by FREY on behalf of Rapid Gas, Inc. in June 2015. <sup>36</sup> The perimeter of the groundwater plume east of Adams Street from north to south is defined by MW-12 in Arlington Avenue, MW-18, MW-10 and MW-21 in San Vicente Avenue and MW-11 and MW-22 in Brunswick Avenue. Benzene was not detected in any of the perimeter wells. The only detection of MTBE was 2.2 µg/L in MW-22. MW-11 and MW-12 were not sampled. Low concentrations of hydrocarbons were detected only once in MW-11 in July 2009. Low concentrations of hydrocarbons were detected only once in MW-12 in May 2006. The lateral extent of dissolved hydrocarbons emanating from the 6020 Site has been defined. <sup>37</sup> The 6020 RPs should not be required to submit a work plan to conduct a groundwater investigation.

Item 3 requires that the 6050 RPs and the 6020 RPs prepare and submit a comprehensive remedial action plan (“RAP”). As discussed above, remediation to abate contamination is ongoing at the 6020 Site and the adjacent site to the east at 6000 Arlington Avenue. <sup>38</sup> The current remedial approach will be adjusted as necessary to obtain low-threat closure. Submission of a RAP for contamination at and emanating from the 6050 Site should be the responsibility of the 6050 RPs only.

Item 4 requires that the 6050 RPs and the 6020 RPs conduct monthly groundwater gauging and measuring of LPH thickness in all wells and semi-annual sampling and analysis of dissolved phase samples. As discussed above, responsibility for these tasks should be divided between and coordinated by the 6050 RPs and the 6020 RPs, with the 6050 RPs performing monitoring and sampling of wells in and west of Adams Street and the 6020 RPs performing monitoring and sampling of wells east of Adams Street.

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<sup>36</sup> See 6020 RPs Exhibit 5.

<sup>37</sup> See 6020 RPs Exhibit 7.

<sup>38</sup> See 6020 RPs Exhibit 6.

Item 5 requires that the 6050 RPs and the 6020 RPs conduct soil gas testing. As discussed above, responsibility for this task should be divided between the 6050 RPs and the 6020 RPs, with the 6050 RPs performing soil gas testing west of Adams Street and the 6020 RPs performing soil gas testing east of Adams Street.

Item 6 requires that the 6050 RPs and the 6020 RPs submit quarterly progress reports. As discussed above, responsibility for this task should be divided between the 6050 RPs and the 6020 RPs, with the 6050 RPs submitting progress reports for activities in and west of Adams Street and the 6020 RPs submitting progress reports for activities east of Adams Street.

Item 7 requires that the 6050 RPs and the 6020 RPs submit a revised RAP if necessary. As discussed above, responsibility for this task should be divided between the 6050 RPs and the 6020 RPs, with the 6050 RPs submitting a revised RAP as necessary for the 6050 Site, Adams Street and areas west thereof and the 6020 RPs submitting a revised RAP as necessary for the 6020 Site and areas east of Adams Street.

#### **IV. CONCLUSION**

For the reasons stated above and as shown by the supporting evidence, the Regional Board should remove the 6020 PRPs from Cleanup and Abatement Order No. R8-2015-0038 and modify the required actions to address the release(s) from the 6050 Site. If the Regional Board elects to include the 6020 PRPs in Cleanup and Abatement Order No. R8-2015-0038, the required actions should be modified to provide that: (1) the 6020 RPs shall perform corrective action to address the 6020 Site and areas east of Adams Street; and (2) the 6050 RPs shall perform corrective action to address the 6050 Site and areas beneath and west of Adams Street.

DATED: November 6, 2015

LAW OFFICES OF MARK B. GILMARTIN

By: \_\_\_\_\_/s/\_\_\_\_\_

Mark B. Gilmartin  
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FILE NO.  
2104.37

June 4, 2016

**Via Email**

Kurt V. Berchtold  
Executive Officer  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3348

***Re: Regional Board Meeting (June 10, 2016)  
Agenda Item 10  
Cleanup and Abatement Order No. R8-2016-0048***

Dear Mr. Berchtold:

I am writing on behalf of Rapid Gas, Inc. (“Rapid Gas”), former operator of underground storage tanks (“USTs”) at 6020 Arlington Avenue, Riverside (“6020 Arlington Avenue”), United El Segundo, Inc. (“United”), former landowner of 6020 Arlington Avenue, and CF United PropCo LLC, current landowner of 6020 Arlington Avenue.

**FORMER LANDOWNERS (6160 ARLINGTON AVENUE)**

Revised Draft Cleanup and Abatement Order (“CAO”) No. R8-2015-0038 was originally presented by staff and attorneys comprising a Prosecution Team to the Santa Ana Regional Water Quality Control Board (“Regional Board”) on December 11, 2015. Legal argument and evidence were submitted by both the Prosecution Team and persons named as Responsible Parties prior to and at the time of the hearing. The Prosecution Team persuasively argued that former landowners J. and R. Wong Family Limited Partnership – II, L.P. (“J and R Wong”) (10-year landowner) and 6160 Arlington Ave., LLC (17-month landowner) should be included as responsible parties in Revised Draft CAO No. R8-2015-0038. Predictably, J and R Wong and 6160 Arlington Ave., LLC argued that the Regional Board does not have legal authority to name as “responsible parties” former landowners who held legal title following removal of leaking USTs. At the conclusion of the evidentiary hearing, the Regional Board took the matter under advisement.

CAO No. R8-2016-0048, which is a revised version of Revised Draft CAO No. R8-2015-0038, was circulated by the Regional Board's Executive Officer to interested parties on May 27, 2016. The primary difference between CAO No. R8-2016-0048 and the preceding version is that CAO No. R8-2016-0048 does not include two former landowners as responsible parties, and the nomenclature used to identify those persons subject to CAO No. R8-2016-0048 is "Dischargers" rather than "Responsible Parties."

The term "responsible party" is defined in California Code of Regulations, title 23, section 2720 to mean "any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred." The reference to section 2720 contained in Revised Draft CAO No. R8-2015-0038 does not appear in CAO No. R8-2016-0048. However, even if section 2720 is not used as a basis for imposing liability on J and R Wong and 6160 Arlington Ave., LLC, Water Code § 13304 provides such authority.

As correctly argued by the Prosecution Team with regard to Revised Draft CAO No. R8-2015-0038, there is ample support in previous decisions by the State Board that "passive migration" of waste that creates a condition of pollution or nuisance constitutes a "discharge." *E.g.*, *In the Matter of the Petition of Zoecon Corporation*, Order WQ No. 86-2. Other Regional Boards have found that "passive migration" constitutes a "discharge." *E.g.*, California Regional Water Quality Control Board San Diego Region Investigative Order No. R9-2016-0069; California Regional Water Quality Control Board San Diego Region Cleanup and Abatement Order No. R9-2011-0029. It is noteworthy that the term "discharge" does not appear to be defined in the Porter-Cologne Water Quality Control Act, Water Code § 13000, *et seq.* Moreover, CAO No. R8-2016-0048 characterizes the current landowners as "dischargers" because "[p]ollutants remain on the property, which constitutes a continuing and/or threatened discharge of waste." Thus, there is no distinction between the current and former landowners as "dischargers."

CAO R8-2016-0048 ¶ 3.d sets forth an inconsistent justification for not including J and R Wong and 6160 Arlington as Dischargers. First, Paragraph 3.d states that current landowner CF United PropCo LLC is liable as a "discharger" because it has owned 6020 Arlington Avenue for more than a brief period of time, "[d]uring which on-site business activities associated with ongoing retail fueling activities may or may not have contributed to, or exacerbated contamination associated with United and/or Rapid Gas' former fueling operations." There was no evidence presented that supports the unsubstantiated speculation that CF United PropCo contributed to or exacerbated contamination at 6020 Arlington Avenue since it became the fee title holder in July 2014. In fact, this contention is contradicted by Revised Draft CAO R8-2015-0038 ¶3.f, which expressly states that "[t]here is no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent to or in the downgradient Site vicinity are the result of releases or discharges stemming from business activities conducted since CF PropCo acquired the 6020 Arlington Avenue

parcel from United and/or Rapid Gas.” Second, Paragraph 3.d states that “[e]ven if conditions have not been exacerbated, CF PropCo is ... subject to liability under Water Code section 13304 for the continuing and/or threatened discharge of pollutants.” Implicit in this statement is the notion that the presence and continuing migration or leaching of pollutants constitutes a “discharge.” Third, Paragraph 3.d states that “J and R Wong and 6160 Arlington Ave., LLC are not being named as Dischargers because they are not the current landowners of any of the subject properties, they cooperated with investigation and cleanup work conducted by others during their period of ownership, and there is currently no evidence to suggest that any of the petroleum hydrocarbons or volatile organic compound (VOC) pollutants present beneath, adjacent to or in the downgradient Site vicinity are the result of releases or discharges stemming from business activity conducted on the shopping center property during the time when it was controlled by J and R Wong or 6160 Arlington Ave., LLC.” The only distinction between CF United PropCo LLC, on the one hand, and J and R Wong and 6160 Arlington Ave., LLC, on the other hand, is that CF United PropCo LLC is a current landowner, whereas J and R Wong and 6160 Arlington Ave., LLC are former landowners. CF United PropCo LLC has likewise cooperated by allowing others to conduct cleanup. CAO No. R8-2016-0048 does not cite any law providing that cooperation justifies exculpation. Finally, CAO No. R8-2016-0048 will create a precedent that when a current landowner, who was not the landowner when a UST release occurred, transfers fee title to the land thereby becoming a former landowner, it will be entitled to removal from a CAO.

## **JOINT AND SEVERAL LIABILITY**

CAO No. R8-2016-0048 ¶ 3.f states that “[t]his Cleanup and Abatement Order is being issued to *all* of the Dischargers to make them jointly and severally liable for the investigation and cleanup activities associated with the commingled releases stemming from the Site.” Draft CAO No. R8-2016-0048 ¶ 3.g correctly notes that Rapid Gas and United have argued against joint and several liability and contend that responsibility for remediating the Site should be apportioned between the parties in relation to the discharges from each parcel. CF United PropCo LLC also argued that in accordance with several State Board orders it should be deemed secondarily responsible since Rapid Gas and United have consistently complied with Regional Board directives. CAO No. R8-2016-0048 does not include any of the revisions requested by Rapid Gas, United or CF United PropCo LLC with regard to Revised Draft CAO R8-2015-0038.

CAO No. R8-2016-0048 ¶ 3.c acknowledges that current landowner My Montecito Inc SH (incorrectly identified as My Montecito Inc., SH) has failed to cooperate with regard to assessment and remediation of the Site. It should also be noted that My Montecito Inc SH did not participate in the Regional Board’s consideration of Draft CAO R8-2015-0038. The undersigned has been informed by My Montecito Inc SH

that it will not participate in or share costs of assessing or remediating the Site until it obtains judicial review of any CAO issued by the Regional Board.

CAO No. R8-2016-0048 ¶ 5.c-g acknowledge that former UST operator Restructure Petroleum Marketing Services of California, Inc. (“RPMS”) initially failed to comply with Regional Board directives, but began to comply after funding was obtained from the Commingled Plume Account. When the funding from the Commingled Plume Account was exhausted, RPMS issued a letter stating it would no longer participate in corrective action activities. RPMS did not participate in the Regional Board’s consideration of Revised Draft CAO R8-2015-0038.

In sum, neither of the two named Dischargers associated with 6160 Arlington Avenue has or will voluntarily pay costs for assessment or remediation of the Site. It is undisputed that Rapid Gas and United have cooperated in performing assessment and remediation activities at the Site. Moreover, Rapid Gas has itself paid all costs for ongoing assessment and remediation activities since January 1, 2015.

It is inequitable and unjust for the Regional Board to compel Rapid Gas, United and CF United PropCo LLC to shoulder the entire burden of assessing and remediating the Site, particularly 6160 Arlington Avenue. It is obviously unfair, and inconsistent with Water Code § 13267(b)(1), to compel Rapid Gas, United and United PropCo LLC to perform remediation on and reporting with regard to 6160 Arlington Avenue, when they never owned nor operated USTs on that property. *See In the Matter of Petition of Union Oil Company of California*, Order No. 90-1 f.n. 6 (“There may, of course, be tasks which are appropriately required only by the dischargers to an individual site. An example would be cleanup of contaminated soil below the site.”). It is undisputed that the direction of groundwater flow beneath the Site has been consistently southeast, and 6160 Arlington Avenue is located west of 6020 Arlington Avenue. It is also undisputed that the hydrocarbons in the soil and groundwater beneath 6160 Arlington Avenue resulted from a release of gasoline from the UST systems formerly operated at 6160 Arlington Avenue, and the hydrocarbons are not commingled with gasoline released at 6020 Arlington Avenue.

Rapid Gas, United and CF United PropCo LLC respectfully request that the Regional Board revise CAO No. R8-2016-0048 by removing the requirement that they perform assessment or remediation within the property boundaries of 6160 Arlington Avenue. The remediation that must be performed at 6160 Arlington Avenue is separate and distinct from the ongoing remediation being performed at 6020 Arlington Avenue. If the Regional Board is inclined to impose joint and several liability, it should be limited to off-site coordinated assessment and remediation.

Kurt V. Berchtold  
June 4, 2016  
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## **EAR ACCOUNT PROGRAM**

In 2015, Rapid Gas and United asked Regional Board staff to consider nominating 6160 Arlington Avenue for the Emergency, Abandoned & Recalcitrant (EAR) Account Program administered by the State Water Resources Control Board, Underground Storage Tank Cleanup Fund. Regional Board staff declined to make the nomination.

The EAR Account receives a \$5 million appropriation annually. Rapid Gas and United believe that 6160 Arlington Avenue would qualify as a recalcitrant site. It appears there are only three sites within Region 8 that are receiving funding from the EAR Account. Rapid Gas, United and CF United PropCo LLC respectfully request that the Regional Board direct Regional Board staff to evaluate 6160 Arlington Avenue for nomination to the EAR Account.

Very truly yours,

/s/

Mark B. Gilmartin

MBG: kk

cc: David Boyers, Esq., Assistant Chief Counsel  
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Noel Sheno, Restructure Petroleum Marketing Services of California, Inc.