

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SWT  
01-09-08

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

January 6, 2006

Ms. Shelby Lathrop  
ConocoPhillips Company  
76 Broadway  
Sacramento, CA 95818

Subject: Fuel Leak Case No. RO0000231, Unocal #0752, 800 Harrison Street, Oakland, CA

Dear Ms. Lathrop:

Alameda County Environmental Health (ACEH) staff have reviewed the fuel leak case file for the above-referenced site and the document entitled, "Semi-Annual Monitoring Report April through September 2005," dated October 26, 2005. ACEH is concerned with the significant increases in fuel hydrocarbon concentrations that have occurred in several wells across the site. These increases have occurred not only in on-site wells but also in downgradient off-site wells. Quarterly groundwater monitoring data from a fuel leak site south of 8<sup>th</sup> Street (726 Harrison Street) also indicates that significant increases in fuel hydrocarbon concentrations recently occurred downgradient of your site. Interim remediation is required to address the elevated concentrations of fuel hydrocarbons in soil and groundwater at your site. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. Interim Remediation. The elevated concentrations of fuel hydrocarbons currently present on-site and migrating off-site require interim remediation. Please present plans for interim remediation in the Work Plan requested below.
2. Groundwater Monitoring. Groundwater monitoring results for individual wells at the site have frequently increased or decreased several orders of magnitude between sampling events. A recent, but by no means isolated, example of these dramatic fluctuations in results is the concentrations of TPHg and MTBE detected in water samples from well MW-7 between 02/04/2004 and 9/30/2005. For well MW-7, the concentration of MTBE increased from 3.2 µg/L during the 2/14/04 sampling event to 5,100 µg/L during the 8/11/04 sampling event. The concentration of MTBE detected in well MNW-7 subsequently decreased from 8,400 µg/L during the 3/31/2005 sampling event to <0.5 µg/L during the 9/30/2005 sampling event. These abrupt variations in results are not consistent across the site and do not appear to correlate with water level changes or to be seasonal in nature. The hydraulic gradient at this site and in sites immediately south of this site appears to be generally consistent both in magnitude and direction. Therefore, the hydrogeology of the site does not appear to be a likely cause of these dramatic variations in results. The significant temporal variations in results make the data difficult to use for decision-making and create uncertainty in the reliability of the data. In order to assess whether minor variations in sampling techniques

may be introducing variability in monitoring results, we request that you modify your sampling methods. We request that you implement low-flow purging and sampling methods using controlled and consistent sampling methods for all future groundwater monitoring events. Due to the elevated concentrations of fuel hydrocarbons that have been detected, please implement quarterly groundwater monitoring rather than semi-annual groundwater monitoring at this site. In addition, you may wish to vary your sampling techniques and collect multiple groundwater samples from individual wells during a quarterly sampling event to test the effects of varying the purging and sampling methods. Please prepare a work plan, which describes the proposed sampling methods for future groundwater monitoring events.

#### TECHNICAL REPORT REQUEST

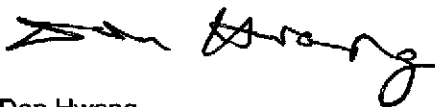
Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- March 6, 2006 – Work Plan for Groundwater Sampling Methods
- March 6, 2006 – Work Plan for Interim Remediation
- April 30, 2006 - Quarterly Report for the First Quarter 2006

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist

cc: Keith Woodburne  
TRC  
1590 Solano Way, Suite A  
Concord, CA 94520

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



04-27-07

20231

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

April 26, 2001

Mr. David De Witt  
Tosco Marketing Company  
2000 Crow Canyon Place, Suite 400  
San Ramon, CA 94583

**Re: Site Conceptual Model for Tosco Service Station No. 0752, 800 Harrison St.,  
Oakland CA 94607**

Dear Mr. De Witt:

Our office has received and reviewed the April 23, 2001 Site Conceptual Model for the referenced service station prepared by Gettler-Ryan. The model concludes that historical spikes in gasoline and MTBE may have been attributed to a faulty spill containment system and exacerbated during the rainy season. The system was replaced in November of 2000. Current TPH concentration since then have shown a decline. Down-gradient sites have confirmed TPH release significantly higher than from this site. These sites, a former Shell and former ARCO station, are in varying stages of investigation and remediation. It appears that no current on-going release is occurring at the site. Your consultant therefore recommends changing back to quarterly groundwater monitoring for the next four quarters, evaluating the trend and if warranted, recommending closure. Our office concurs with this approach. Please insure that the wells do not have any oxygen-releasing compound in them during this monitoring period.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Douglas, Gettler-Ryan Inc., 6747 Sierra Court, Suite J, Dublin, CA 94568  
Mr. K. Chan, 4328 Edgewood Ave., Oakland CA 94602  
Mr. R. Kitay, ASE, 208 W. El Pintado, Danville, CA 94526  
Mr. Bo Gin, 288 11<sup>th</sup> St., Oakland CA 94607  
Mr. R. Scheele, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B, Oakland CA 94608

SCM800HarrisonSt

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



12-20-00

20231

December 19, 2000  
StID # 918

Mr. Dave DeWitt  
Tosco Marketing Co.  
2000 Crow Canyon Place, Suite 400  
San Ramon, CA 94586

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

**Re: Tosco (Unocal) SS #0752, 800 Harrison St., Oakland CA 94607**

Dear Mr. DeWitt:

This letter is to inform you that I am the new case worker for the oversight of the referenced site, taking over from Mr. Larry Seto, of our office. Therefore, please send future reports and address your questions to me. I have briefly reviewed the site history and it appears that the current operator is using second generation fuel tanks, which are located just south of the first generation tanks. The site has been fairly well characterized. Groundwater conditions are characterized by intermittent elevated MTBE concentrations. There is no apparent trend or predictability to these spikes, although it is apparent that this site has, at times, experienced releases of MTBE. Given the fairly consistent south-westerly gradient at the site, it is likely that the former Shell site at 726 Harrison may have been impacted by these releases. It is, however, acknowledged that the former Shell Site, as well as the former ARCO site at 706 Harrison also have experienced MTBE releases of their own. The former ARCO site has operated a soil vapor/air sparge extraction system for several years and is currently requesting concurrence for shutting down the system due to asymptotic removal levels. The former Shell site will be requested to prepare a feasibility study to remediate their elevated MTBE levels.

Because of the numerous potential fuel release sites in the area near this site, it is important to gain as much understanding of each site as possible, otherwise, there will be no way to apportion existing and future responsibility. Therefore, our office requests that you prepare a site conceptual model (SCM) as has been done on other Tosco sites, with the hope that this site's release can be distinguished from the other sites. Cross sectional diagrams over all affected sites may be helpful. You may want to examine site conditions prior to each reported MTBE spike to see if there are explanations for these occurrences.

Please continue semi-annual monitoring as well as the placement of oxygen-releasing compound socks in the impacted wells at the site. Both pre and post purge dissolved oxygen readings should be taken from these wells.

Please contact me at (510) 567-6765 if you have any questions.

Mr. Dave DeWitt  
December 19, 2000  
StID # 918  
800 Harrison St., Oakland 94607  
Page 2

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. D. Vossler, Gettler-Ryan Inc., 6747 Sierra Court, Suite J, Dublin, CA 94568

Mr. K. Chan, 4328 Edgewood Ave., Oakland CA 94602

Mr. R. Kitay, ASE, 208 W. El Pintado, Danville, CA 94526

Mr. Bo Gin, 288 11<sup>th</sup> St., Oakland, CA 94607

Mr. R. Scheele, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B., Oakland CA 94608

Stat800Harrison

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 231

Alameda County CC4580  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

May 13, 1996  
STID 918  
page 1 of 2

Attn: Tina Berry  
Unocal Corporation  
2000 Crow Canyon Place, Suite 400  
PO Box 5155  
San Ramon CA 94583

RE: Unocal service station #0752, 800 Harrison St., Oakland CA 94607

Dear Ms. Berry,

Since my last letter to you, dated 2/7/95, the following documents have been received in this office:

- 1) "Quarterly Data Report," prepared by MPDS, dated 1/31/95;
- 2) "Quarterly Data Report," prepared by MPDS, dated 5/3/95;
- 3) letter from KEI, dated 5/18/95 (information obtained for nearby UST sites);
- 4) "Quarterly Data Report," prepared by MPDS, dated 8/8/95;
- 5) "Pilot Vapor Extraction Test Report," prepared by KEI, dated 10/23/95;
- 6) "Quarterly Data Report," prepared by MPDS, dated 11/6/95; and
- 7) "Quarterly Data Report," prepared by MPDS, dated 1/31/96.

The monitoring wells have been sampled and monitored quarterly for several quarters. MW1, MW2, and MW3 have been on a quarterly schedule since 6/5/91; MW4, MW5, and MW6 since 10/19/92; MW7 and MW8 since 4/28/93. Concentrations of contaminants have been fairly consistent for several quarters. **Therefore, it would be acceptable to reduce the sampling and monitoring frequency from quarterly to semi-annually (first and third quarters).**

The pilot vapor extraction (VE) test conducted last year concluded that VE would not work well at this site. Our file notes indicate that you spoke with my colleague Dale Klettke on 11/13/95 during my absence. The notes indicate you discussed the use of an oxygen-releasing compound in the form of a "sock" placed in individual wells, for the purpose of raising oxygen levels and promoting biodegradation. **Please respond within 30 days as to the status of implementing this system.**

May 13, 1996  
STID 918  
page 2 of 2  
Attn: Tina Berry  
Unocal Corporation

I can be reached directly at 510-567-6761.

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Bob Kezerian, Kaprealian Engineering Inc., 2401 Stanwell Dr., Suite 400, Concord CA  
94520  
MPDS, 2401 Stanwell Drive, Suite 300, Concord CA 94520  
Acting Chief/file

je.918-C

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

R0231

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 7, 1995  
STID 918

DEPARTMENT OF ENVIRONMENTAL HEALTH  
ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

Attn: Tina Berry  
Unocal Corporation  
2000 Crow Canyon Place, Suite 400  
PO Box 5155  
San Ramon CA 94583

RE: Unocal station #0752, 800 Harrison St., Oakland CA 94607

Dear Ms. Berry,

Since my last letter to you dated 6/8/94, the following documents have been received in this office:

- 1) August 2, 1994 Quarterly Data Report, prepared by MPDS Services, Inc. This report documents the sampling and monitoring of groundwater on 7/5/94.
- 2) November 8, 1994 Quarterly Data Report, prepared by MPDS Services, Inc. This report documents the sampling and monitoring of groundwater on 10/6/94.
- 3) December 1, 1994 Revised Work Plan/Proposal, prepared by Kaprealian Engineering Inc., proposing a vapor extraction pilot test for MW-3.

I have discussed the details of the vapor extraction pilot test via telephone with your consultant, Bob Kezerian, of KEI. It is likely that the well screen in MW-3 is no longer exposed, due to this winter's unusually high precipitation. Therefore, the pilot test will be postponed until at least two feet of well screen is exposed in MW-3; it may be summer before this condition is achieved. **The workplan is acceptable under this condition.**

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. If you have any questions, please contact me at 510-567-6761; our fax number is 510-337-9335. These are new phone and fax numbers as of August 1994.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Robert Kezerian, Kaprealian Engineering Inc., 2401 Stanwell  
Dr., Suite 400, Concord CA 94520  
Ed Howell/file

je.918-B



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0231

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 8, 1994  
STID 918

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Tina Berry  
Unocal Corporation  
2000 Crow Canyon Place, Suite 400  
PO Box 5155  
San Ramon CA 94583

RE: Unocal station #0752, 800 Harrison St., Oakland CA 94607

Dear Ms. Berry,

Since my last letter to you dated 3/10/94, the following documents have been received in this office:

- 1) May 5, 1994 Quarterly Data Report, prepared by MPDS Services, Inc. This report documents the sampling and monitoring of groundwater on 4/2/94.
- 2) February 3, 1994 Quarterly Data Report, prepared by MPDS Services, Inc., documenting groundwater sampling and monitoring on 1/3/94.
- 3) April 1, 1994 Subsurface Investigation Report, prepared by Kaprealian Engineering Inc. This report documents the drilling of 10 soil borings in March 1994.

We are also in receipt of the 5/18/94 letter from Kaprealian Engineering Inc. This letter requests a modification in the sampling program for this site. **The request is to discontinue the analysis for TPH-d and VOCs (by EPA Method 8010) in MW-1. This request is acceptable, for the reasons stated in the 5/18/94 KEI letter.**

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Robert Kezerian, Kaprealian Engineering Inc., 2401 Stanwell  
Dr., Suite 400, Concord CA 94520  
Ed Howell/file

je 918-A

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0231

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 10, 1994  
STID 918

Tina Berry  
Unocal Corporation  
2000 Crow Canyon Place, Suite 400  
PO Box 5155  
San Ramon CA 94583

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

RE: Unocal station #0752, 800 Harrison St., Oakland CA 94607

Dear Ms. Berry,

We are in receipt of the 2/4/94 Work Plan for 10 exploratory borings, prepared by Kaprealian Engineering Inc. (KEI). We are also in receipt of the 11/29/93 Phase I Environmental Site Assessment, prepared by PHR Environmental Consultants, Inc. The workplan is acceptable for implementation on the following conditions:

- 1) At least one soil sample from the capillary fringe in each boring will be submitted for analysis.
- 2) Soil cuttings will be characterized and properly disposed. Hazardous wastes may be stored onsite for no longer than 90 days without a storage permit, as per 22 CCR.

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. If you have any questions, please contact me at 510-271-4530.

Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,

A handwritten signature in cursive script, appearing to read 'J Eberle'.

Jennifer Eberle  
Hazardous Materials Specialist

cc: Joel Greger, Kaprealian Engineering Inc., 2401 Stanwell  
Dr., Suite 400, Concord CA 94520  
Ed Howell/file

je

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

R0231

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 25, 1993  
STID 918

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Edward C. Ralston  
Unocal Corporation  
2000 Crow Canyon Pl., Suite 400  
PO Box 5155  
San Ramon CA 94583

RE: Unocal Service Station #0752  
800 Harrison St.  
Oakland CA 94607

Dear Mr. Ralston,

Thank you for the Quarterly Report and the Work Plan/Proposal, both prepared by Kaprealian Engineering Inc., and both dated 1/21/93. As you are aware, the Quarterly Report documents the sampling of MW1 through MW6 on 12/21/92. Concentrations as high as 8,500 ppb of TPH-g and 1,500 ppb benzene were detected (MW3). The newest three monitoring wells (MW4 through MW6) were also shown to contain elevated levels of petroleum hydrocarbons.

The 1/21/93 Work Plan/Proposal for two additional offsite, downgradient monitoring wells is a logical next step, and is hereby accepted for implementation. Please inform me at least two business days in advance when drilling will commence, so that I can be onsite if possible.

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Tim Ross, Kaprealian Engineering Inc., 2401 Stanwell Dr.,  
Suite 400, Concord CA 94520  
Rich Hiatt, RWQCB  
Ed Howell/File

je

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0231

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 23, 1992

STID 918

Unocal Corporation  
2000 Crow Canyon Pl., Ste 400  
PO Box 5155  
San Ramon CA 94583  
Attn: Tim Howard

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

RE: Unocal Service Station 0752  
800 Harrison St.  
Oakland CA 94607

Dear Mr. Howard,

On August 4, 1992, we received the Quarterly Report for the second quarter of 1992, prepared by your consultant, Kaprealian Engineering Incorporated (KEI). In this report, KEI recommends that Oil & Grease and the 5 metals analyses for MW1 be discontinued. This recommendation was based on five consecutive quarters of nondetectable concentrations for Oil & Grease and cadmium, and levels below the EPA's Maximum Contaminant Levels (MCLs) for the other four metals. Therefore, we approve this recommendation for MW1.

During a telephone conversation on 9/23/92 between Tom Berkin of KEI and myself, he indicated that the three additional monitoring wells (MW4 to MW6) were to be installed beginning 9/30/92. He also indicated that the reason 1200 ppm TPH-g was left in place under dispenser #2 (D2) was that the structural integrity of the canopy would be compromised if the excavation proceeded. There is also elevated concentrations of hydrocarbons left in place in the area of the former fuel tanks.

If you have any questions concerning this letter, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Tim Ross, Kapraelian Engineering Inc., 2401 Stanwell Dr.,  
Ste 400, Concord CA 94520  
Rich Hiatt, RWQCB  
Ed Howell/Files

je-918