

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
12-19-05

December 16, 2005

Shelby Lathrop (Contractor)
ConocoPhillips - Risk Management and Remediation
76 Broadway
Sacramento, CA 95818

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

Dear Ms. Lathrop,

Subject: Fuel Leak Case No. RO0000298, Unocal Service Station No. 4625,
3070 Fruitvale Ave., Oakland, CA

Alameda County Environmental Health staff has reviewed "Additional Groundwater Investigation Work Plan" dated November 23, 2005, prepared by TRC. We approve of the Work Plan. We request that you perform the proposed work, address the following technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

CPT-2 - Please locate to within 10 feet and downgradient of the dispensers.

TECHNICAL REPORT REQUEST

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

February 16, 2006 - Groundwater Investigation Report

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, I may be reached at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Keith Woodburne, TRC, 1590 Solano Way, Suite A, Concord, CA 94520
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCVT
02-10-05

February 9, 2005

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

Thomas H. Kosel, Site Manger, Risk Management and Remediation
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Dear Mr. Kosel,

Subject: Fuel Leak Case No. RO0000298, Unocal Service Station No. 4625,
3070 Fruitvale Ave., Oakland, CA

Alameda County Environmental Health staff has reviewed "Work Plan for Limited Subsurface Investigation" dated July 23, 2003, prepared by Gettler-Ryan. We disapprove the Work Plan. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Groundwater Monitoring Wells - We do not agree with the proposed monitoring wells. We feel that it would be premature to install more monitoring wells without additional groundwater sampling to determine the location of the plume for optimal well locations. Please submit a Work Plan for groundwater sampling, which will determine the optimal locations for additional monitoring wells.
- 2) Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site.
 - a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan requested below.
- 3) Historical Hydraulic Gradients – Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site. Please submit with the Work Plan requested below.

Mr. Kosel
February 9, 2005
Page 2 of 2

TECHNICAL REPORT REQUEST

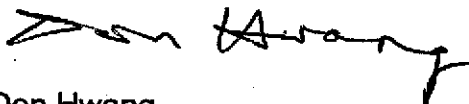
Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

April 9, 2005 - Work Plan

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, I may be reached at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Roger Batra, TRC, 1590 Solano Way, Suite A, Concord, CA 94520
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-502

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

September 4, 2002

David De Witt
Tosco Marketing Co.
2000 Crow Canyon Pl., #400
San Ramon, CA 94583

Dear Mr. De Witt,

Subject: Fuel Leak Case No. RO0000298, Tosco 76 Branded Facility No. 4625, 3070 Fruitvale Ave., Oakland, CA

Alameda County Environmental Health staff has reviewed "Work Plan for Limited Subsurface Investigation", dated May 24, 2002, prepared by Gettler-Ryan, Inc., and generally concur with the work proposed. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Groundwater monitoring well locations - We do not concur with one of the locations proposed, at the northwest corner of the site. We feel that this location may miss downgradient flow from the former fuel tanks. Previously, we indicated that none of the onsite monitoring wells were within 10 feet of the former fuel tanks and dispensers in the downgradient direction. Therefore, we believe that siting a the well in the vicinity of the proposed boring location west and close to the former fuel tanks would be more appropriate at this time. Also, we feel that another well should be located close to and downgradient of the northern dispenser islands.
- 2) Soil boring locations - We do not concur with the two locations proposed at the northeast corner of the property. We feel that additional borings upgradient and further away from the dispensers may miss contamination from the dispensers. However, we feel that locating a boring closer to the dispenser islands will more likely find detectable concentrations.
- 3) Soil borings - The proposed soil borings do not include groundwater samples. We would like groundwater samples collected also.
- 4) Laboratory analyses - The proposed analyses are Total Petroleum Hydrocarbon (Gasoline) [TPH-G], Benzene, Toluene, Ethylbenzene, Xylene (BTEX), Methyl Tertiary-Butyl Ether (MTBE) and "the other fuel oxygenates" by Environmental Protection Agency (EPA) Method 8260B. Please be sure to include the fuel oxygenates: Tertiary Amyl Methyl Ether

Mr. De Witt
September 4, 2002
Page 2 of 2

(TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA). Also, include Ethylene Dibromide (EDB), Ethylene Dichloride (EDC), and Ethanol.

TECHNICAL REPORT REQUEST

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

November 3, 2002 – Amendments to the Workplan

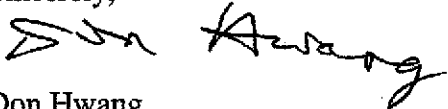
These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

ADDITIONAL REQUEST

All work plans and technical reports submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company.

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Jed Douglas, Gettler-Ryan Inc., 6747 Sierra Ct., Suite J, Dublin, CA 94568

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-02-02

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

March 29, 2002

David De Witt
Tosco Marketing Co.
2000 Crow Canyon Pl., #400
San Ramon, CA 94583

Dear Mr. De Witt,

Subject: Fuel Leak Case No. RO0000298, Tosco 76 Branded Facility No. 4625,
3070 Fruitvale Ave., Oakland, CA

Alameda County Environmental Health staff has reviewed "Site Information Summary and Request for Closure", dated August 21, 2001, prepared by Gettler-Ryan. We do not concur with your consultant's recommendation that the site be considered for case closure. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Site Characterization - The lateral and vertical extent of soil and groundwater contamination at your site does not appear to be adequately defined. The latest groundwater sampling event, May 11, 2001, was the only time that the gradient was downgradient (south) of the former fuel tanks and dispensers. Previous gradients were west and once, northwest. None of the onsite monitoring wells were within 10 feet of the former fuel tanks and dispensers in the downgradient direction. Therefore, additional monitoring wells downgradient of the former fuel tanks and dispensers is required.

Analytical results from soil samples indicate contaminated soil containing up to 1,700 ppm Total Petroleum Hydrocarbons-Gasoline (TPH-G) and 17 ppm Benzene (UX-3-8.5 collected April 23, 1998) remains in place. Delineation of soil contamination is required at your site.

Please include your proposal to complete this work in the workplan requested below.

TECHNICAL REPORT REQUEST

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

Mr. De Witt
March 29, 2002
Page 2 of 2

May 29, 2002 - Site Characterization Workplan

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

ADDITIONAL REQUEST

All work plans and technical reports submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company.

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Jed Douglas, Gettler-Ryan Inc., 6747 Sierra Ct., Suite J, Dublin, CA 94568

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-18-01

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

July 17, 2001

David De Witt
Tosco Marketing Co.
2000 Crow Canyon Pl., #400
San Ramon, CA 94583

Dear Mr. De Witt,

Subject: Tosco 76 Branded Facility No. 4625, 3070 Fruitvale Ave., Oakland, CA
RO0000298

The first and second quarter 2001 groundwater monitoring and sampling reports dated March 26, 2001 and June 12, 2001, prepared by Gettler-Ryan were reviewed. Low or nondetectable (ND) concentrations were found on February 9, 2001 and May 11, 2001 in all monitoring wells for all constituents tested: Total Petroleum Hydrocarbons-Gasoline (TPH-G), TPH-Diesel (TPH-D), Benzene, Toluene, Ethylbenzene, Xylenes (BTEX), and Methyl Tertiary-Butyl Ether (MTBE). These results were historically consistent.

May 11, 2001 was the first time that the gradient was determined to be southerly. Previous gradients were westwardly and once northwestwardly. The latest sampling event was the only time a monitoring well was downgradient of the former fuel tanks. Additional monitoring and sampling downgradient of the former fuel tanks is desirable. If future gradients do not lead to a downgradient well, then an/ additional borings/well/s will need to be installed to monitor and sample groundwater downgradient of the former fuel tanks.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

W

C: file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



01-21-01

20298

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

January 19, 2001

David De Witt
Tosco Marketing Co.
2000 Crow Canyon Pl., #400
San Ramon, CA 94583

Dear Mr. De Witt,

Subject: Tosco (76) Service Station #4625, 3070 Fruitvale Ave., Oakland, CA
Std 143

"4th Quarter 2000 Groundwater Monitoring & Sampling Report" for Tosco (76) Service Station #4625, 3070 Fruitvale Ave., Oakland, CA, G-R Job #180255, prepared by Gettler-Ryan, dated December 11, 2000 was reviewed. Please continue the monitoring program.

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang". The signature is stylized and written in a cursive-like font.

Don Hwang
Hazardous Materials Specialist

C: Deanna L. Harding, Gettler-Ryan Inc., 6747 Sierra Ct., Suite J, Dublin, CA 94568

file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 5/8/2000
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20298

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

May 4, 2000

David De Witt
Tosco Marketing Co.
2000 Crow Canyon Place #400
San Ramon, CA 94583

Dear Mr. De Witt:

Subject: Tosco (Unocal) SS #4625, 3070 Fruitvale Ave., Oakland, CA
StId 143

"Work Plan for Limited Subsurface Investigation...#140158.03-1, Prepared by: Gettler-Ryan Inc., January 13, 2000" and the facimile dated April 26, 2000 which shows the proposed southern monitoring well location moved more towards the west was reviewed. This work plan with revision is approved.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: David Vossler, Gettler-Ryan Inc., 7100 Redwood Blvd. #104, Novato, CA 94945
C.V.
file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 11-29-99
Including cc's

20298

ENVIRONMENTAL HEALTH SERVICES

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

November 24, 1999

David DeWitt
TOSCO Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

STID: 143

Re: Investigations at Tosco (Unocal) Service Station No. 4625, located at 3070 Fruitvale Avenue, Oakland, CA

Dear Mr. DeWitt,

In April 1998, two 10,000-gallon single-walled steel gasoline underground storage tanks (USTs) and one 550-gallon single-walled steel waste oil UST was removed from the above site, along with the associated piping and dispenser islands. Four soil samples (UX-1-8.5 through UX-4-8.5) were collected from below the gasoline USTs at 8.5-feet below ground surface (bgs). These soil samples were analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), Methyl Tertiary Butyl Ether (MTBE), and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Analysis of the soil samples identified up to 1,700 parts per million (ppm) TPHg, 16ppm MTBE, 17ppm benzene, 120ppm toluene, 47ppm ethylbenzene, and 240ppm total xylenes.

One soil sample, UW-1-8.5, was collected from below the waste oil UST at 8.5-feet bgs. This soil sample was analyzed for TPHg, TPH as diesel (TPHd), MTBE, BTEX, Oil & Grease (O&G), volatile organic compounds (VOCs), semi-volatile compounds (SVOCs), and ICAP 5 metals. Analysis of this sample identified up to 820ppm TPHg, 200ppm TPHd, 56ppm O&G, 2.7ppm benzene, 38ppm toluene, 22ppm ethylbenzene, 120ppm total xylenes, and 1.4ppm MTBE. Additionally, 700ppm of chromium, which exceeds 10 times the Soluble Threshold Limit Concentration (STLC), was identified.

Per Article 11, Division 3, Chapter 16, Title 23 of the California Code of Regulations (CCR), you are required to conduct a Preliminary Site Assessment (PSA) to determine the lateral and vertical extent and severity of soil and groundwater contamination which has resulted from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The major elements of such an investigation, include, but are not limited to, the following:

- At least one groundwater monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of data identifying the local confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. Based on my cursory review of maps, it appears that there are no wells in the immediate vicinity of the site that you could tie in to in order to accurately determine groundwater flow directions.

Dave DeWitt
Re: 3070 Fruitvale Ave.
November 24, 1999
Page 2 of 3

- During the installation of the monitoring wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology. Subsequent to the installation of the monitoring wells, these wells must be surveyed to Mean Sea Level, with an accuracy of 0.01 foot. Groundwater samples and water level measurements from the wells are to be collected and analyzed quarterly.

Both soil and groundwater samples shall be analyzed for TPHg, TPHd, O&G, BTEX, MTBE, VOCs, SVOCs, and chromium.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.;
- Status of groundwater contamination characterization;
- Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.;
- Recommendations or plans for additional investigative work or remediation; and
- An Interpretation and Conclusion section.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. All reports and proposals must be submitted under the seal of a California -Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

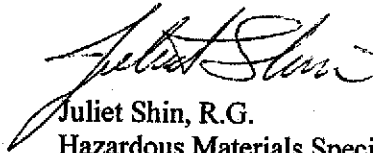
The PSA proposal is due within 60 days of the receipt of this letter (i.e., by January 19, 2000). Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final closure by our office and the San Francisco Bay Regional Water Quality Control Board (RWQCB). The quarterly reports are due the first day of the second month of each subsequent quarter.

Please be advised that this is a formal request for a work plan pursuant to Section 2722(c)(d) of Title 23 California Code of Regulations. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

David DeWitt
Re: 3070 Fruitvale Ave.
November 24, 1999
Page 3 of 3

Thank you for your cooperation. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin, R.G.
Hazardous Materials Specialist

Cc: David J. Vossler
Gettler-Ryan Inc.
6747 Sierra Court, Suite J
Dublin, CA 94568

**ALAMEDA COUNTY
HEALTH CARE SERVICES**



AGENCY
DAVID J. KEARS, Agency Director

R0298

November 29, 1995

Mr. Thomas A. Geisler
California R.W.Q.C.B.
2101 Webster St., Ste. 500
Oakland CA 94612

① Globe Metals Co @ 1820 10th St.
- Not in Envision
- In Geotracker: WFT, OPEN
Lead: RW&CB
Local: ACEH

② BASF Corp @ 1545 Willow St
- Not in Envision
- In Geotracker: WFT, CLOSED (11/4/94)
Lead: RW&CB

③ Encinal marina @ 2051 Grand St
- Not in Envision
- In Geotracker: SUC, OPEN
Lead: RW&CB

④ Chevron @ 3360 Isl St: WFT, OPEN
Lead: RW&CB

18
sion
250

Re: Alameda County Health Agency Sites with Lead Agency as "LI" (Inactive). ⑤ East Bay Bmw @ 3830 Old Santa Rita Rd

Dear Mr. Geisler:

LUFT, OPEN
Lead: RW&CB
Local: ACEH

OAKLAND

7-Eleven	22350 Harrison St.	Not LOP
(R0553) Auto Service Station	9000 14th St. E.	#3232 (EC)
(R0650) BART	3924 Martin Luther King	#406 (EC)
(R0306) Cal East Foods	505 Cedar St.	#3971 (SH)
(R0604) Pressure Cast Co.	4201 14th St. E.	#101 (BC)
(R0847) Soc. of St. Vincent De Paul	9235 San Leandro St.	#4306 (EC)
Unknown	1549 40th Ave.	Not LOP/No SLIC
(R0298) Unocal	3070 Fruitvale Ave.	Not LOP/Mod. closed
BASF Corp.	1545 Willow St.	Not LOP, SLIC case, clsd 11/29/94
(R0116) Bramalea Pacific	1111 Broadway	#3664
(R0981) Kelley Auto Parts	4400 Telegraph Ave.	Not LOP. Removal ust
R.D. Miner Co.	750 37th St.	Not LOP/No SLIC
(R0585) Huntington Labs	700 Kevin St.	#4418 (CL)
Globe Metals Co.	1820 10th St.	Not LOP/SLIC case open
(R01060) Schaffer's Meat Co.	1110 98th Ave.	#3957 (EC)
(R0405) Chevron	3530 MacArthur Blvd.	#1042 (ML)
(R0612) Right Parking	1225 Webster St.	#5284 (JE)
(R010) Port of Oakland Bldg. C-01	2277 7th St.	#3899 (JE)
(R0145) Auto Tech West	2703 Martin Luther King	#454 (JE)
(R033) Port of Oakland trans Bay IT	707 Ferry St.	#3982 (JE)
(R0468) New Genico	3927 14th St. E.	#4610 (BC)

ALAMEDA

Encinal Marina 2051 Grand St. Not LOP

DUBLIN

(R01069) Agorra Building Supply 5965 Dougherty Rd. #4107 (EC)

LIVERMORE

Sweetwater Forest Fire Sta.	47405 Mines Rd.	Not LOP. Depref case open
Chevron	3360 1st St.	Not LOP. SLIC case open
(R0436) Unocal	1771 1st St. N.	Not LOP. Ust removal open

PLEASANTON

East Bay BMW	3830 Old Santa Rita Rd.	Not LOP/No SLIC
--------------	-------------------------	-----------------

Last column are site id numbers for LOP cases. These are not inactive. Please correct your records.
Thank you.

Sincerely,



Thomas Peacock
LOP Manager

TP/na

C: John Kaiser, R.W.Q.C.B.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO 298

RAFAT A. SHAHID, Assistant Agency Director

August 24, 1993
STID # 143

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Mr. Syed Rizvi
Environmental Compliance Officer, Unocal
Unocal Corporation
911 Wilshire Blvd., Floor 11
Los Angeles, California

Re: FIVE YEAR UNDERGROUND TANK PERMIT FOR UNOCAL # 4625 LOCATED
AT 3070 FRUITVALE AVE., OAKLAND

Dear Mr. Rizvi;

Please find enclosed a five-year operating permit certificate, for three underground storage tanks at the site noted above. This permit is being issued, contingent upon the facility's compliance with all applicable underground tank monitoring requirements. Acceptable monitoring procedures are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective August 9, 1991. In order to maintain a valid permit, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected. Below is a summary of the monitoring requirements for your facility:

1. Sections 2645 and 2646 - Inventory Reconciliation

- a) Record the daily variation in inventory reconciliation. This is the difference between the measured inventory in the tank and the calculated inventory. The calculated inventory shall be determined by adding the fuel inputs from deliveries and subtracting the day's sales withdraws from the physically measured inventory of the day before.

Meters or gauges used to measure the in tank inventory must be approved by this office. Commercial gauges and measuring devices should meet the standards in Title 4, Chapter 9, of the California Code of Regulations (C.C.R.) and be inspected by the County Department of Weights and Measures.

Weekly tank gauging shall only be used as part of a monitoring program for existing tanks which have a total system capacity of 2,000 gallons or less and which can be taken out of service for at least 48 continuous hours each week. Tanks with a capacity of 550 gallons or less may be exempt from integrity testing each year.

You are advised that after January 1, 1993, using manual stick readings to measure the physical inventory, may require your inventory reconciliation data to be evaluated by a third party certified statistical analyst. This rule applies where the highest anticipated ground water may come to less than 20 feet below the bottom of the tank.

Daily variations shall be summed for a period of one month. If monthly variations exceed 1% per cent of the monthly tank delivery plus 130 gallons, this office must be notified. An investigation as to the cause of excess variations must be conducted and reported to this office.

- b) Submit an annual statement to this office which states that all inventory reconciliation data are within allowable limits or list the times and corresponding variations when allowable limits were exceeded. This statement shall be executed under penalty of perjury.

2. Section 2643 - Non-visual Monitoring

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or a leak rate of three gallons per hour at 10 p.s.i. exists; and

Annual piping system integrity testing shall be conducted which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 (one and a one half times) normal operating pressure.

- b) Annual tank integrity testing shall be conducted which is capable of detecting a release of 0.1 gallon per hour at or above the maximum product level of the tank.

3. Section 2663 - Overfill Prevention

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred

into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.

4. Section 2643 et. seq., Non- Visual Monitoring

- a) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment or conducting monitoring procedures. Maintain the plan on site for review.

5. Section 2712 - Permit Conditions

- a) Retain all monitoring and maintenance records on-site or at a readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

During an inspection performed August 12, 1993, four vent pipes were observed for the three tanks, at this facility. Our records fail to support the presence of an additional tank on site and no other pipes or risers for a fourth tank were seen. If a fourth underground tank is discovered, you must notify this office. Please be advised, that each tank currently in use or inactive must be included on the your permit. An additional \$56.00 state registration fee and Underground Storage Tank Permit Application Form-B will be required.

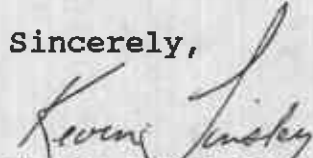
The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.

Unocal
August 24, 1993
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Should you have any questions or concerns regarding the contents of this letter, please call me at (510)271-4320.

Sincerely,



Kevin Tinsley
Hazardous Materials Specialist

cc: Edgar Howell, Chief (kt-files), AlCo. E.H.D.
Ron Owcarz, Haz. Mat. Specialist, AlCo. E.H.D.
Jack Huie, Unocal Dealer