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Attorneys for Petitioner
ChevronTexaco Corp.

Alameda County
Office of the
Environmental Health Officer

STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

<p>In Re:</p> <p>Alameda County Health Care Services Agency Record ID: RO0000374 Letter dated July 7, 2003, issued to ChevronTexaco re 15595 Washington Ave., San Lorenzo</p> <hr/>	<p>) SWRCB FILE NO. :</p> <p>)</p> <p>) SUPPLEMENTAL PETITION OF</p> <p>) CHEVRONTEXACO CORP. FOR</p> <p>) REVIEW OF JULY 7, 2003 LETTER</p> <p>) FROM ALAMEDA COUNTY HEALTH</p> <p>) CARE SERVICES AGENCY</p> <p>) DESIGNATING CHEVRONTEXACO</p> <p>) AND AGNES CALLERI AS</p> <p>) SECONDARY RESPONSIBLE</p> <p>) PARTIES</p> <p>)</p> <p>) (REVIEW PURSUANT TO STATE</p> <p>) WATER RESOURCES CONTROL</p> <p>) BOARD RESOLUTION NO. 88-23)</p>
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INTRODUCTION

Petitioner ChevronTexaco Corp. (hereinafter "ChevronTexaco") on August 6, 2003 filed a PETITION OF CHEVRONTEXACO CORP. FOR REVIEW OF JULY 7, 2003 LETTER FROM ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DESIGNATING CHEVRONTEXACO AND AGNES CALLERI AS SECONDARY

RESPONSIBLE PARTIES ("Petition"). At the same time that its Petition was filed, ChevronTexaco requested that the Petition be held in abeyance for 60 days pending ChevronTexaco's ongoing discussions with the Alameda County Health Care Services Agency ("Agency") concerning its decision and the preparation of a sensitive receptor survey for the site. The State Water Resources Control Board ("SWRCB") graciously agreed to hold the Petition in abeyance until October 4, 2003.

As the Agency has refused to discuss de-designation of ChevronTexaco and Agnes Calleri as responsible parties for soil and groundwater contamination at 15595 Washington Avenue, San Lorenzo, ChevronTexaco hereby petitions the SWRCB to review the Agency's decision contained in its letter of July 7, 2003. This paper, including its attachments, supplements ChevronTexaco's Petition and provides additional information necessary for the SWRCB's consideration of the Petition. As the relevant factual and procedural histories were set forth in detail in the Petition, they will not be repeated here.

POINTS AND AUTHORITIES

A. Standard for de-designation of RP.

In its Order WQO 2002-0021 ("Order"), the SWRCB held that

it is not appropriate for an LOP agency to remove a person who has been properly named as a responsible party for cleanup of an unauthorized release unless it finds, by a preponderance of the evidence, that constituents from that party's release, when taken in conjunction with commingled constituents from another release(s) that have similar effects on beneficial uses, do not contribute to the need for cleanup at the site (Order at 8).

The SWRCB further explained that in the instant case,

[i]f the County determines that the constituents from the first release do not contribute to the need for cleanup at the site, it may remove Texaco and the Callaris' designation as responsible parties. For example, if the County decides: (1) that the site would be closed but for the MTBE from the second release(s), and (2) that the BTEX constituents remaining from the first release do not have similar effects as MTBE on beneficial uses, it may remove Texaco and the Callaris as responsible parties (Order at 11).

As discussed more fully below and in ChevronTexaco's Petition, the evidence overwhelmingly demonstrates that the pre-1983 release does not contribute to the need for cleanup at the subject property, and because of this, ChevronTexaco and the Callaris should have been de-designated as responsible parties.

B. The Agency refuses to apply the SWRCB standard for de-designation.

In response to the SWRCB's remand of this matter to the Agency in November 2002, ChevronTexaco initiated discussions with the Agency concerning this matter. ChevronTexaco sought to provide the Agency with additional relevant information concerning the site so that the Agency could make the determination outlined by the SWRCB's Order. For example, on June 17, 2003, ChevronTexaco provided the Agency with a technical evaluation prepared by Cambria Environmental Technology, Inc. ("Cambria") concerning the attenuation of the constituents from the pre-1983 release (see Exhibit A & B attached hereto). This evaluation concluded that the constituents from the pre-1983 release would not have contributed to the need for cleanup of the site in 1986 or now (Exhibit B at 5-6). The Agency, however, has refused to meet with ChevronTexaco to discuss the issues, has not commented on the Cambria attenuation report, and instead issued its July 7, 2003 letter re-designating ChevronTexaco and the Callaris as responsible parties. The Agency instead stated that it believes that it is not possible to de-designate anyone once listed as a responsible party when the case has not been closed

(see electronic mail message from Ms. Eva Chu of the Agency dated May 29, 2003 attached hereto as Exhibit C). The Agency refuses to consider any evidence demonstrating that the de-designation test articulated by the SWRCB has been met by ChevronTexaco. Accordingly, ChevronTexaco requests the SWRCB to find that, by a preponderance of the evidence, ChevronTexaco has met the standard to be removed as a responsible party for the contamination at the subject location and order the Agency to de-designate ChevronTexaco and the Callaris.

C. Attenuation analysis supports de-designating ChevronTexaco.

On June 17, 2003, ChevronTexaco submitted a technical evaluation prepared by Cambria concerning the contamination detected at the subject location and an analysis of the attenuation of the pre-1983 release constituents (Exhibits A & B.) This technical evaluation discussed the absence of detectable concentrations of hydrocarbons in the soil collected from three borings and the low concentrations of benzene, toluene and xylenes (“BTX”) detected in groundwater (Exhibit B at 3-4). It further evaluated the attenuation rates of the pre-1983 BTX constituents and concluded that “the hydrocarbons detected in 1986 would not contribute to the need for cleanup of the site, whether in 1986 or now” (Id. at 5-6). If not for the MTBE release(s) that post-date ChevronTexaco’s ownership of the property, the site would pose no risk to beneficial uses of groundwater and would qualify for closure (Id. at 6). No competent evidence has been presented to the contrary.¹

¹ On August 10, 2003, Mehdi Mohammadian submitted his Response to Petition of Chevron Texaco[sic] Corp. dated 8/6/2003. Mr. Mohammadian ignores the SWRCB’s findings in its Order of November 2002 and presents unfounded and spurious claims such as that ChevronTexaco purposefully contaminated Mohammadian’s property by adding MTBE to the monitoring wells (Mohammadian Response at 6). Such specious and irresponsible claims illustrate the lack of substance of Mohammadian’s opposition to ChevronTexaco’s request for de-designation.

D. No adverse impact on sensitive receptors due to pre-1983 release.

In support of ChevronTexaco's request to the Agency to de-designate it as a responsible party, ChevronTexaco proposed completing a sensitive receptor survey for the location. On October 1, 2003, Cambria provided ChevronTexaco with a report discussing the sensitive receptor survey data, a copy of which is attached as Exhibit D.² Cambria found that there were no wells located closer than 1/16 of mile to the site and that San Lorenzo Creek is approximately 1/8 mile from site (Exhibit D at 2). Cambria concludes that there are no sensitive receptors that would have been adversely impacted by hydrocarbons from the pre-1983 release (Id. at 2-3). Accordingly, this data and Cambria's analysis provide further support for a determination that ChevronTexaco and the Callaris should be removed as a responsible party for the subject location.

E. Environmental screening levels below thresholds for remediation.

Cambria's October 1 analysis also compared site conditions in 1986 to environmental screening levels (ESLs) presented in a recent publication of the Regional Water Quality Control Board - San Francisco Bay Region. Cambria found that the concentrations of BTX detected in 1986 were below the ESL's for those constituents for property used for residential purposes (the most conservative land use scenario) (Exhibit D at 3-4). Accordingly, Cambria concludes that groundwater remediation would not be required based on the low concentrations detected in 1986 and that the site would qualify for closure (Id. at 4.) Cambria also notes that the non-presence of hydrocarbon

² The Agency would not wait for this sensitive receptor analysis and instead issued its letter re-designating ChevronTexaco as an RP on July 7, 2003. ChevronTexaco has submitted Cambria's October 1, 2003 report to the Agency, along with this Supplemental Petition, notwithstanding the Agency's previous refusal to consider such evidence (see Exhibit C). ChevronTexaco therefore requests that the SWRCB review and consider Cambria's October 1, 2003 report.

contamination in the soil analyzed in 1986 indicates that there was no significant impact to soil from operations at the site prior to its sale by ChevronTexaco (Id.). Therefore, an analysis of 1986 site conditions and environmental screening levels demonstrate conclusively that but for the MTBE release(s) occurring after ChevronTexaco sold the property, the site would be closed. Further, the low concentrations of hydrocarbon detected in 1986 “do not have a similar effect on beneficial use as the high concentrations of MTBE from the more recent release(s) and do not contribute to the need to cleanup the site” (Id. at 5.)

F. Conclusion

The Agency has refused to apply the standard for de-designation of a responsible party articulated in the SWRCB’s Order. Further, based upon the data and analyses provided to the Agency, and that which is attached hereto, there is overwhelming evidence that the site would be closed but for the MTBE release(s) occurring after ChevronTexaco sold the property and that the BTX concentrations detected in 1986 do not have similar effects as MTBE on beneficial uses. In addition, Cambria’s analysis indicates that BTX concentrations detected in 1986 would now be near or below drinking water standards based on attenuation rates for the current MTBE fuel release(s). Accordingly, the SWRCB should direct the Agency to remove ChevronTexaco and the Callaris from the list of responsible parties for this site.

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SERVICE ON ALAMEDA COUNTY HEALTH CARE SERVICES AND OTHER

INTERESTED PARTIES

A proof of service of this Supplemental Petition on all interested parties,
including Alameda County Health Care Services, is attached.

Dated: October 3, 2003

GLYNN & FINLEY, LLP

By

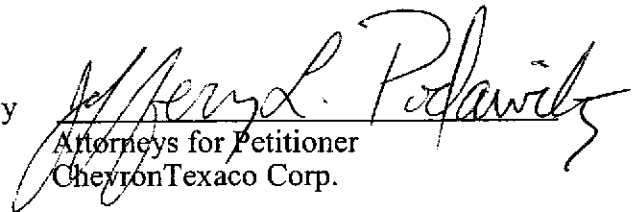

Attorneys for Petitioner
ChevronTexaco Corp.

EXHIBIT
A

Environmental Management
Company
6001 Bollinger Canyon Rd, L4050
P.O. Box 6012
San Ramon, CA 94583-2324
Tel 925-842-1589
Fax 925-842-8370

Karen Streich
Project Manager

ChevronTexaco

June 17, 2003

Ms. Eva Chu
Alameda County Health Care Services
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

Subject: Former Texaco Station 211285
15595 Washington Ave, San Lorenzo

Dear Eva,

Attached is a technical evaluation of potential contamination related to site operations prior to Texaco selling the referenced property. As described in records previously submitted to the County, Texaco owned the property for three years but did not operate a service station at this location.

We are requesting that Alameda County Health Care Services (the County):

1. Reconsider the site as two separate release cases: one for the release(s) prior to Texaco selling the site in 1986 and the other for the release(s) after Texaco sold the site.
2. Review the attached information and close the environmental case related to the release(s) that occurred prior to Texaco selling the site in 1986.

We also request that, as part of closing the early release case, Texaco be de-designated as a Responsible Party for the more recent release that involves MTBE, which was not used in Northern California until after Texaco divested the property.

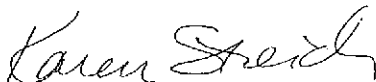
I agree with the conclusions and recommendations presented in the attached report. The information in this report is accurate to the best of my knowledge and all local Agency/Regional Board guidelines have been followed. This report was prepared by Cambria Environmental Technology, Inc. upon whose assistance and advice I have relied. This paragraph is included in this letter pursuant to the requirements of California Water Code Section 13267(b)(1) and the regulating implementation entitled Appendix A pertaining thereto. I declare under penalty of perjury that the foregoing is true and correct.

June 17, 2003

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We would be glad to meet with you to discuss this site or provide any additional information you require to review this request. If you have any questions or there is any way we can help you with this review, please call me at 925-842-1589.

Sincerely,



Karen Streich
Project Manager

Copy to:


Scott MacLeod, Cambria Environmental, 5900 Hollis St, Suite A, Emeryville, CA 94608
Jon Robbins, ChevronTexaco Legal Department

June 16, 2003

Ms. Karen Streich
ChevronTexaco
P. O. Box 6004
San Ramon, California 94583

Re: **Responsible Party Status**
Former Texaco Station 211285
15595 Washington Avenue
San Lorenzo, California

Dear Ms. Streich:



As requested, Cambria Environmental Technology, Inc. (Cambria) is submitting this analysis of responsible parties for the site referenced above. At issue is an earlier de-designation of Texaco (now ChevronTexaco) as a responsible party (RP) by the Alameda County Health Care Services Agency (ACHSA). The current property owner challenged the de-designation and the State Water Resources Control Board (SWRCB) remanded the case back to the ACHSA for justification. We understand that the ACHSA has changed case workers and the current case worker and ACHSA management have no intention of justifying their earlier position. Our objective is to review the site data and assess whether the ACHSA was justified in their original de-designation. The site background and our analysis are presented below.

Site Background

The site was operated as an active service station from approximately 1964 through 1983 and from 1986 through to the present. From 1974 to 1983, the site was owned by the Callaris family, who operated a service station. Texaco owned the site from 1983 through 1986, but did not operate the facility and neither stored nor dispensed gasoline during that period. During Texaco's site ownership, the underground storage tanks (USTs) were drained of all product and remained inactive. In 1986, the site was purchased by Mr. Bertram Kubo. In 1990, Mr. Mehdi Mohammadian bought the site and now operates a Shell retail service station.¹

Three generations of USTs have been located on the site. The first generation USTs were in place from 1964 through approximately 1969 at a location south of the existing station building. The second generation of USTs was installed in 1969 at the same location as the first generation USTs. The second generation USTs were removed in approximately 1986 and the third

**Cambria
Environmental
Technology, Inc.**


5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

¹ *Preliminary Off-Site Soil and Groundwater Assessment*, Enviro Soil Tech Consultants, May 15, 2000.

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generation USTs were installed at a new location south of the product islands and east of the station building. Site maps are included in Attachment A.

At least two petroleum hydrocarbon releases have occurred at the site. The first release, identified by a 1986 subsurface investigation², was found to have occurred near the pump islands and is most reasonably explained by a leak in the product piping or dispensers during operation of that system. Since Texaco never operated the station, the first release must have occurred prior to 1983, at least 20 years ago.



A subsequent release(s) was found to have occurred beginning in the mid-1990's. The high concentrations and distribution of methyl tertiary butyl ether (MTBE) in groundwater indicate the third generation USTs are the source of MTBE detected in a 1998 subsurface investigation³ and subsequent groundwater monitoring events. Groundwater monitoring data are compiled in Attachment B.

Site Geology

The subsurface soil conditions were described in reports documenting site investigations completed in 1986, 1998, and 2000. Based on boring logs presented in these technical reports, the water-bearing zone beneath the site is comprised of predominately clay and silty clay horizons from depths of approximately 8 to 20 feet below grade (fbg), the total depth explored.

Groundwater occurs in these fine-grained soils at depths ranging from approximately 8 to 10 fbg. Groundwater generally flows westward at an average gradient of 0.007 ft/ft. Based on the westerly flow of groundwater, no potential receptors have been identified downgradient of the site.

In general, the clay and silty clay horizons that comprise the water-bearing zone beneath the site have a relatively low hydraulic conductivity that will act to impede the flow of groundwater and thereby reduce the potential for significant downgradient migration of petroleum hydrocarbons. This is supported by the limited extent of MTBE from the most recent release(s).⁴

² *Report of Subsurface Hydrocarbon Investigation*, Groundwater Technology, Inc., October 17, 1986


³ *Soil and Groundwater Investigation Results*, Toxicchem Management Systems, Inc., October 16, 1998

⁴ *Preliminary Off-site Soil and Groundwater Assessment*, Enviro Soil Tech Consultants, May 15, 2000

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Based on the results of an off-site investigation in 2000⁵, the lateral extent of petroleum hydrocarbons, including MTBE is defined south and west (downgradient) of the site.

Justification for De-Designation of Texaco and Calleris family



According to the SWRCB, Texaco and the Calleris family were RP's at the site because they owned the property and the USTs (whether in or out of service) and because there is evidence of an historic petroleum hydrocarbon release predating 1983. The SWRCB also stated that it is not appropriate for the local oversight program to remove an RP unless it finds, "...by a preponderance of the evidence that constituents from that party's release, when taken in conjunction with commingled constituents from another release(s) that have similar effects on beneficial use, do not contribute to the need for cleanup at the site."

The SWRCB also stated that if an RP has been issued a closure letter, it would ordinarily be inappropriate for that RP to be held liable for cleanup of other releases on site for which that RP had no responsibility (e.g., the RP is not the current owner and did not control the USTs from which the release occurred). As indicated by the arguments presented below, it is obvious that Texaco and the Calleris family should not only be de-designated, but should be issued closure for the release that occurred prior to 1983.

Site Conditions

The original 1986 investigation was conducted in support of a property transaction and was intended as an environmental screening of site conditions prior to Texaco's sale of the property. Groundwater Technology, Inc. (GTI) installed wells MW-1, MW-2 and MW-3, and drilled soil borings SB-1, SB-2 and SB-3. During the investigation, GTI composited three soil samples per boring into one sample for analysis, which is common practice when screening sites in support of property transactions. No total fuel hydrocarbons, benzene, toluene or xylenes were detected in soil.

Because the samples were composited from three samples, the maximum concentration of a constituent that could have been present is three times the detection limit used. Therefore, the maximum total fuel hydrocarbon concentration, if present at all, was below 30 milligrams/kilogram (mg/kg). Maximum benzene and toluene concentrations would have been 1.5 mg/kg, and the maximum xylenes concentration would have been 3 mg/kg. The fact that

⁵ Preliminary Off-site Soil and Groundwater Assessment, Enviro Soil Tech Consultants, May 15, 2000

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none of these compounds were detected in soil indicates that there was no significant impact to soil from operations prior to 1983.

This evidence for a minimal impact to the subsurface is further supported by the lack of elevated hydrocarbon concentrations in groundwater. No hydrocarbons were detected in groundwater from wells MW-2, MW-3 or borings SB-2 and SB-3, located on four sides of the USTs. Therefore, it is evident that no release occurred from the USTs.

Boring SB-1 and well MW-1 were installed approximately 25 feet apart, just north and south of the product islands, respectively. Low concentrations of hydrocarbons were detected in groundwater from well MW-1 (82 micrograms/liter [ug/l] xylenes) and boring SB-1 (220 ug/l benzene, 390 ug/l toluene and 680 ug/l xylenes). The current maximum contaminant levels for drinking water (MCLs) for these compounds are 1 ug/l benzene, 150 ug/l toluene and 1,750 ug/l xylenes. Therefore, in 1986, the benzene and toluene concentrations detected in groundwater in boring SB-1 exceeded the current MCLs. Xylenes concentrations were below MCLs.

In summary, no hydrocarbons were detected in soil near the USTs or the dispensers, and low concentrations of benzene and toluene concentrations that exceed current MCLs were detected in groundwater beneath the dispensers during the 1986 property transaction assessment. The extent of hydrocarbons detected in groundwater was limited and, because of the low concentrations detected, did not indicate a significant release from the dispensers. Based on the original sampling data, it would have been appropriate to name Texaco and the Callaris family as RPs and to require additional assessment and monitoring. However, the low concentrations detected would not have warranted any active remediation.

Attenuation of Constituents from Pre-1983 Release

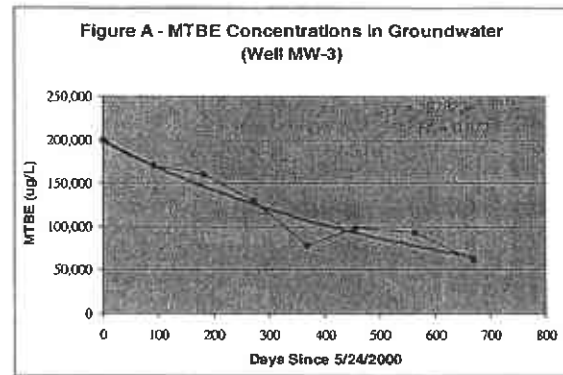
The SWRCB indicated that the ACHSA must determine whether the constituents attributable to Texaco and the Callaris family, taken in conjunction with other constituents having similar effects on beneficial use (i.e., the later MTBE release), are contributing to the current need for corrective action. Based on the original sampling data, the low hydrocarbon concentrations detected would not have warranted any active remediation in 1986 or at present.

To further support that no active remediation is necessary based on the original release, we compared attenuation rates for TPHg and MTBE from the second release(s) and used these rates to estimate benzene and toluene attenuation rates. Because benzene and toluene typically attenuate at a quicker rate than TPHg or MTBE, applying the attenuation rates for TPHg and MTBE to the low concentrations of benzene and toluene that exceeded MCLs in 1986 would

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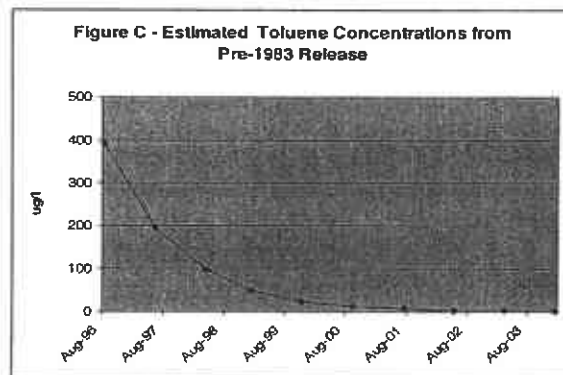
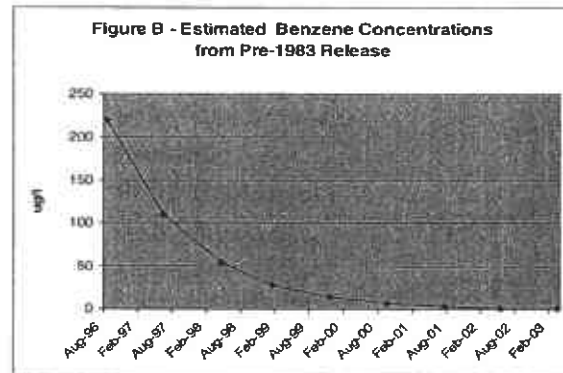
allow us to conservatively estimate current benzene and toluene concentrations that we would expect to detect in groundwater were there no second oxygenated fuels release(s).

To determine TPHg and MTBE attenuation rates, we plotted TPHg and MTBE concentrations versus time for wells MW-1, MW-2 and MW-3. The data plotted are from



the time when the constituents first appeared in the wells at elevated concentrations. We then applied a first order decay rate function to model the observed concentration reductions (see Figure A for an example, and Attachment C for complete results). We then used the equation derived for the first order decay rate function to determine the half-life of TPHg and MTBE currently detected in groundwater in wells MW-1, MW-2 and MW-3. Because benzene and toluene typically attenuate faster than TPHg or MTBE, an average half-life predicted based on TPHg and MTBE attenuation should result in a conservative estimate of benzene and toluene concentration reductions over time.

The half-life for TPHg from the most recent release(s) ranged from 58 to 267 days. The half-life for MTBE ranged from 408 to 578 days. The overall average of all half-life estimates for TPHg and MTBE is 302 days. Applying this 302-day half-life to the maximum benzene and toluene concentrations detected in the 1986 investigation, toluene concentrations would have been below MCLs by early 1998, and benzene concentrations would have dropped below MCLs by early 2003 (Figure B and C). In reality, attenuation rates for benzene and toluene are likely higher than the rates estimated based on TPHg and MTBE, so it is likely that MCLs were achieved well before the dates estimated herein.



Conclusions

Based on this evidence, it is apparent that the hydrocarbons detected in 1986 would not

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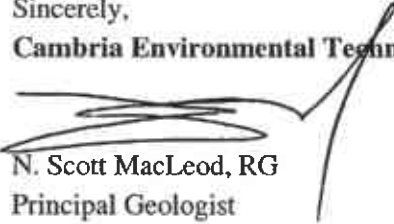
contribute to the need for cleanup of the site, whether in 1986, or now. The SWRCB stated that the ACHSA may de-designate Texaco and the Callaris family if "constituents from the first release do not contribute to the need for cleanup at the site". The SWRCB further stated that the ACHSA could de-designate Texaco and the Callaris family if: (1) the site would be closed but for the MTBE from the second release(s), and (2) the BTEX constituents remaining from the first release do not have similar effects as MTBE on beneficial uses".

The evidence presented above clearly indicates that, in absence of the recent oxygenated fuels release(s), the site would not only pose no risk to beneficial uses of groundwater, but would qualify for unconditional closure. For this reason, we recommend that ChevronTexaco pursue de-designation with the ACHSA and, failing that, appeal to the SWRCB.

The current property owner has not only apparently been recalcitrant in remediating the MTBE releases, past notices of violation (NOVs) issued by the ACHSA indicate possible questionable business practices that could result in future releases. For these reasons, it is not in ChevronTexaco's best interest to be related in any manner to current or future environmental concerns at the site. Even a secondary RP status as we understand is under consideration by the ACHSA could have significant liability that is unwarranted and not in ChevronTexaco's best interest.

Please contact me at (510) 420-3301 if you have any questions or comments.

Sincerely,
Cambria Environmental Technology, Inc.


N. Scott MacLeod, RG
Principal Geologist



Attachments: A - Site Maps
B - Groundwater Monitoring Data
C - Attenuation Rate Calculations

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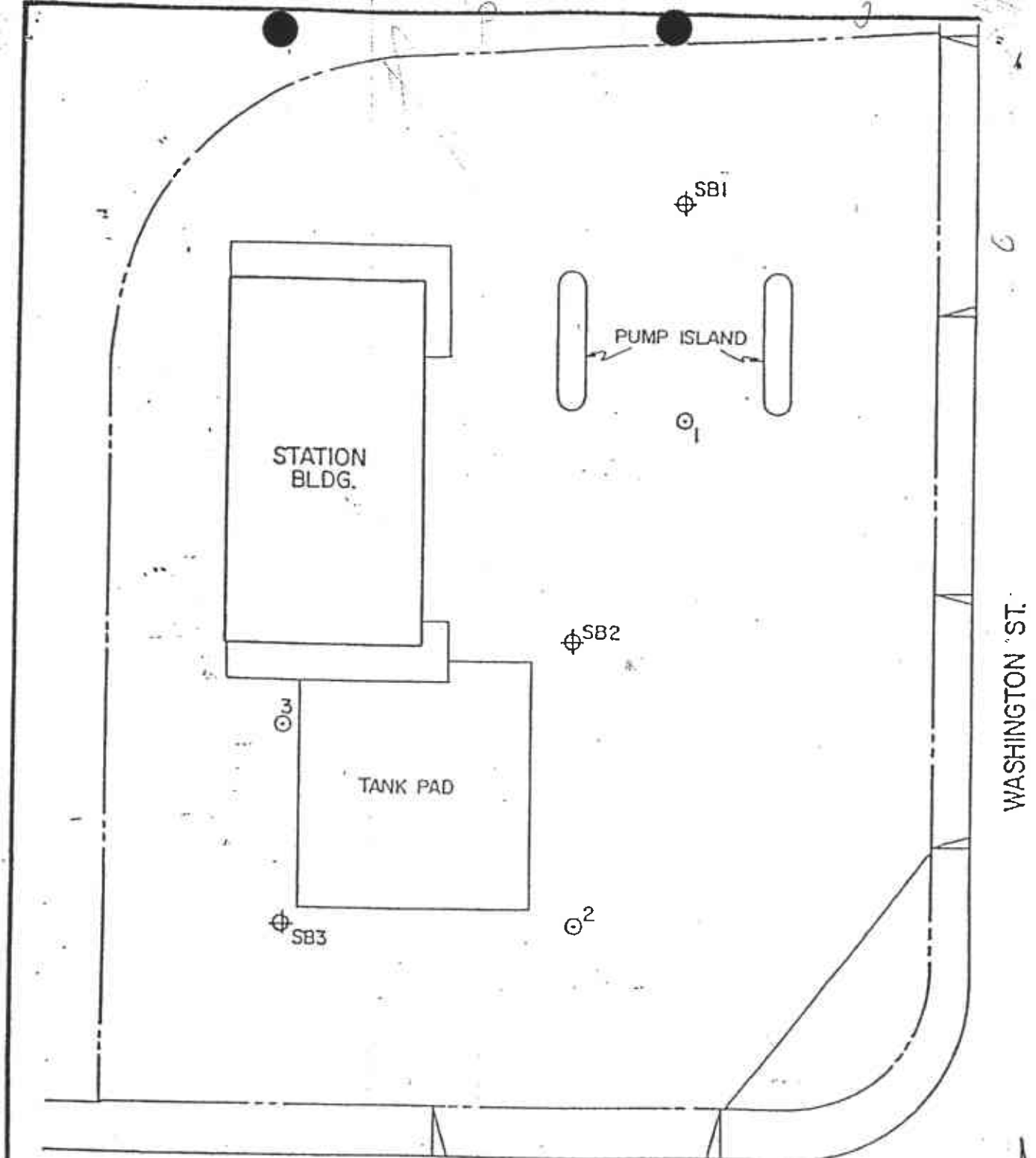
ATTACHMENT A

Site Maps



ENVIRO SOIL TECH CONSULTANTS

Figure 1



LEGEND

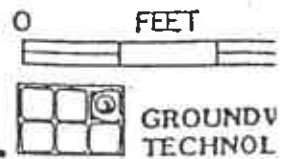
- ⊙ MONITORING WELL
- ⊕ SOIL BORING

VIA ENRICO ST.

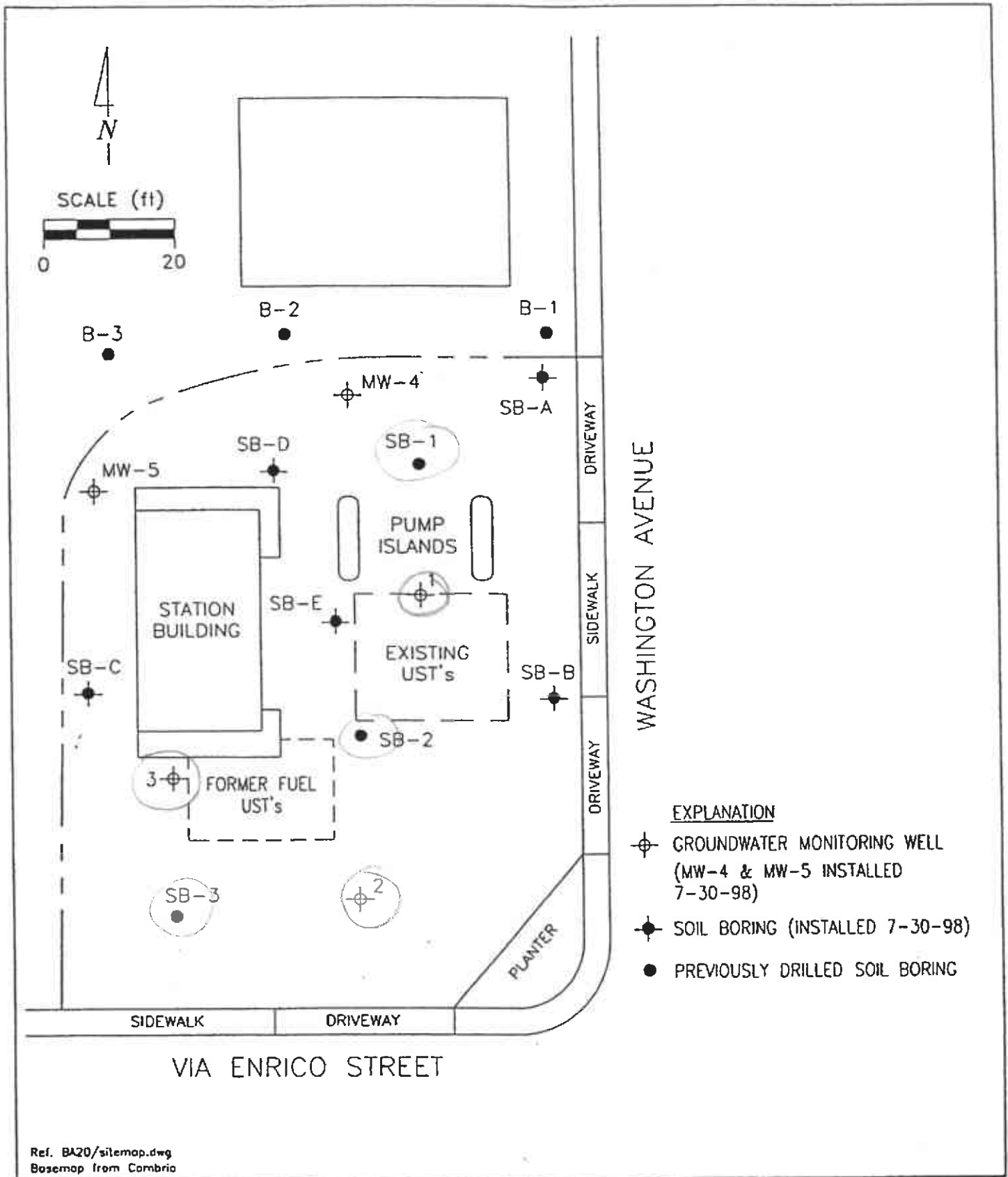
WASHINGTON ST.

**FIGURE 2
SITE PLAN**

TEXACO USA
SAN LORENZO, CALIFORNIA



10/86



PREPARED BY
TOXICHEM
 Management Systems, Inc.

SITE PLAN
 15595 Washington Avenue
 San Lorenzo, California

FIGURE:
 2
PROJECT:
 BA20



AVENUE

LORENZO

TWO ST
15'
LO

TWO STORY /
BUILD
15580, 155
LORENZO

TWO STORY
APARTMENT
BUILDING

845, 847 & 849
VIA ENRICO

VIA

(E) FACE OF CURB
(E) 7' SIDEWALK

60'

TC
21.42

BH
21.52

41'

TC-EP
20.82

BH 20.92
BH-11

BH-12

BH-10

BH 20.92

TC BH
20.82

(E) 7' SIDEWALK
(E)

31'

28'

23'

BH-9

BH-8

BH-7

⊕ MONITORING WELL
⊕ BORE HOLE

RY APARTMENT
BUILDING
2 & 15576
N2O AVE.

RTMENT
& 15588
E.

TWO STORY
APARTMENT
BUILDING
, 825 & 827
IA ENRICO



FC/COR 24.22 (E) FENCE & PROP. LINE MW-4 23.40

MW-5 23.86

MW-3 22.56

MW-2 21.94

MW-1 23.05

TC 22.82

BW 22.72

N-1 22.72

BW 22.42

TC-ER 22.32 MSI

TC 22.02

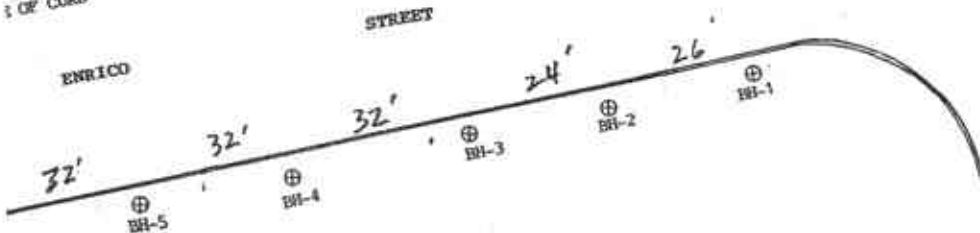
BW 21.82

N-2 21.72

TC-ER 21.72

BW 21.52

TC 21.42



MONITORING WELL LOCATIONS
15595 WASHINGTON AVENUE
SAN LORENZO, CALIFORNIA

SCALE: 1"=20' JUNE 10, 2000

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ATTACHMENT B

Groundwater Monitoring Data

TABLE 1
GROUNDWATER MONITORING DATA (feet)
AND ANALYTICAL RESULTS ($\mu\text{g/L}$)

Date	Well No./ Elevation	Depth of Well	Depth of Perf.	Depth to Water	GW Elev.	Well Observation	TPHg	B	T	E	X	MTBE
8/08/86	MW-1 (N/A)	15	10	N/A	N/A	N/A	N/A	ND<500	ND<500	NA	82	NA
11/12/92				11.37†	N/A	N/A	720	3	0.5	1	1	NA
3/24/94	22.93 (feet MSL)			8.71*	14.22	Odor	1300	110	ND<0.5	19	ND<0.5	NA
12/15/95				8.49*	14.44	No sheen Weakly petroleum odor	350	18	2.9	3.5	2.8	NA
8/26/98	22.96 Resurveyed			9.30*	13.66	N/A	ND <500	17	ND<5	ND<5	ND<5	340000
1/26/99				7.96*	15.00	N/A	ND <50000	ND<500	ND<500	ND<500	ND<500	269000
4/06/99				8.01*	14.95	N/A	3500	296	ND<10	43	18.6	117000
5/24/00	23.05 Resurveyed			8.24*	14.81	No sheen or odor	33000	ND <5000	ND <5000	ND <5000	ND <5000	74000
8/24/00				9.43*	13.62	No sheen or odor	11000	ND <2000	ND <2000	ND <2000	ND <2000	32000
11/22/00				9.28*	13.77	Light rainbow sheen No odor	24000	ND <2500	ND <2500	ND <2500	ND <2500	35000
2/22/01				7.86*	15.19	No sheen or odor	19000	ND <5000	ND <5000	ND <5000	ND <5000	51000
5/29/01				8.96*	14.09	No sheen or odor	30000	ND <5000	ND <5000	ND <5000	ND <5000	110000
8/22/01				9.66*	13.39	No sheen or odor	46000	ND <2500	ND <2500	ND <2500	ND <2500	70000
12/06/01				8.36*	14.69	No sheen or odor	25000	ND <2500	ND <2500	ND <2500	ND <2500	37000
3/25/02				7.84*	15.21	Light rainbow sheen No odor	770	ND<830	ND<830	ND<830	ND<830	20000

TABLE 1 CONT'D
GROUNDWATER MONITORING DATA (feet)
AND ANALYTICAL RESULTS ($\mu\text{g/L}$)

Date	Well No./ Elevation	Depth of Well	Depth of Perf.	Depth to Water	GW Elev.	Well Observation	TPHg	B	T	E	X	MTBE
11/12/92	MW-3 (N/A)	16	10	11.32†	N/A	N/A	69	ND<0.3	ND<0.3	ND<0.3	ND<0.3	NA
3/24/94	22.73 (feet MSL)			8.69*	14.04	N/A	ND<50	ND<0.5	ND<0.5	ND<0.5	ND<0.5	NA
12/15/95				8.31*	14.42	No sheen or odor	ND<50	ND<0.5	ND<0.5	ND<0.5	ND<0.5	NA
8/26/98	22.74 Resurveyed			9.29*	13.45	N/A	ND <500	36	ND<5	ND<5	ND<5	99000
12/16/99				8.00*	14.74	N/A	ND <500	ND<50	ND<50	ND<50	ND<50	19800
4/06/99				8.00*	14.74	N/A	ND <1000	ND<10	ND<10	ND<10	ND<10	151000
5/24/00	22.56 Resurveyed			8.08*	14.47	No sheen or odor	48000	ND <12500	ND <12500	ND <12500	ND <12500	200000
8/24/00				9.24*	13.32	No sheen or odor	52000	ND <5000	ND <5000	ND <5000	ND <5000	170000
11/22/00				9.08*	13.48	No sheen or odor	69000	ND <10000	ND <10000	ND <10000	ND <10000	160000
2/22/01				7.58*	14.98	No sheen or odor	30000	ND <5000	ND <5000	ND <5000	ND <5000	130000
5/29/01				8.76*	13.80	No sheen or odor	29000	ND <2500	ND <2500	ND <2500	ND <2500	78000
8/22/01				9.46*	13.10	No sheen or odor	37000	ND <5000	ND <5000	ND <5000	ND <5000	98000
12/06/01				8.06*	14.50	No sheen or odor	33000	ND <5000	ND <5000	ND <5000	ND <5000	94000
3/25/02				7.62*	14.94	No sheen or odor	ND<50	ND <2500	ND <2500	ND <2500	ND <2500	62000

TABLE 1 CONT'D
GROUNDWATER MONITORING DATA (feet)
AND ANALYTICAL RESULTS (µg/L)

Date	Well No./ Elevation	Depth of Well	Depth of Perf.	Depth to Water	GW Elev.	Well Observation	TPHg	B	T	E	X	MTBE
5/29/01	MW-5 (23.86) feet MSL	19	N/A	10.08	13.78	Rainbow sheen No odor	3700	83	ND<50	58	ND<50	860
8/22/01				10.76	13.10	Light rainbow sheen No odor	5900	150	ND<10	ND<10	ND<10	1700
12/06/01				9.48	14.38	Rainbow sheen Light petroleum odor	4900	ND<50	ND<50	ND<50	ND<50	1900
3/25/02				9.08	14.78	No sheen or odor	4000	170	ND<83	ND<83	ND<83	2200

TPHg - Total Petroleum Hydrocarbons as gasoline

MTBE - Methyl Tertiary Butyl Ether

MSL - Mean Sea Level

N/A - Not Applicable

ND - Not Detected (Below Laboratory Detection Limit)

* Well screens are submerged

BTEX - Benzene, Toluene, Ethylbenzene, Total Xylenes

Perf. - Perforation

GW Elev. - Groundwater Elevation

NA - Not Analyzed

† Well screens are not submerged

TABLE 2 CONT'D
GROUNDWATER ANALYTICAL RESULTS FOR
HYDROCARBONS FUEL OXYGENATES (EPA 8260B)

Date	Well No.	Hydrocarbons Fuel Oxygenates	Concentration (µg/L)
2/22/01	MW-4	Methyl tert-butyl Ether	32
5/29/01		Methyl tert-butyl Ether	31
8/22/01		Methyl tert-butyl Ether	28
12/06/01		Methyl tert-butyl Ether	25
3/25/02		Methyl tert-butyl Ether	14
5/24/00	MW-5	Benzene	180
		Ethylbenzene	140
		Isopropylbenzene	55
		Methyl tert-butyl Ether	200
		n-Butylbenzene	42
		n-Propylbenzene	200
		Naphthalene	120
8/24/00		1,2,4-Trimethylbenzene	15
		Benzene	150
		Ethylbenzene	91
		Isopropylbenzene	38
		Methyl tert-butyl Ether	300
		n-Butylbenzene	29
		n-Propylbenzene	140
		Naphthalene	87
		p-Isopropyltoluene	28
		sec-Butylbenzene	12
11/22/00		Benzene	120
		Ethylbenzene	46
		Isopropylbenzene	31
		Methyl tert-butyl Ether	510
		n-Propylbenzene	100
		Naphthalene	37
2/22/01		Benzene	100
		Ethylbenzene	94
		Methyl tert-butyl Ether	700
		n-Propylbenzene	160
		Naphthalene	90

C A M B R I A



ATTACHMENT C

Attenuation Rate Calculations

MW-1

Raw Data

Date	GWE	TPH-G (ug/L)	MTBE (ug/L)
12/12/1992		720	
3/24/1994	14.22	1,300	
12/15/1995	14.44	350	
8/26/1998	13.66	<500	340,000
1/26/1999	15.00	<50000	269,000
4/6/1999	14.95	3,500	117,000
5/24/2000	14.81	33,000	74,000
8/24/2000	13.62	11,000	32,000
11/22/2000	13.77	24,000	35,000
2/22/2001	15.19	19,000	51,000
5/29/2001	14.09	30,000	110,000
8/24/2001	13.39	46,000	70,000
12/6/2001	14.69	25,000	37,000
3/25/2002	15.21	770	20,000

Edited Data

Date	GWE	TPH-G (ug/L)	MTBE (ug/L)
12/12/1992		720	
3/24/1994	14.22	1,300	
12/15/1995	14.44	350	
8/26/1998	13.66	250	340,000
1/26/1999	15.00	25,000	269,000
4/6/1999	14.95	3,500	117,000
5/24/2000	14.81	33,000	74,000
8/24/2000	13.62	11,000	32,000
11/22/2000	13.77	24,000	35,000
2/22/2001	15.19	19,000	51,000
5/29/2001	14.09	30,000	110,000
8/24/2001	13.39	46,000	70,000
12/6/2001	14.69	25,000	37,000
3/25/2002	15.21	770	20,000

Days Since
5/24/2000

TPH-G
(ug/L)

Days Since
8/26/1998

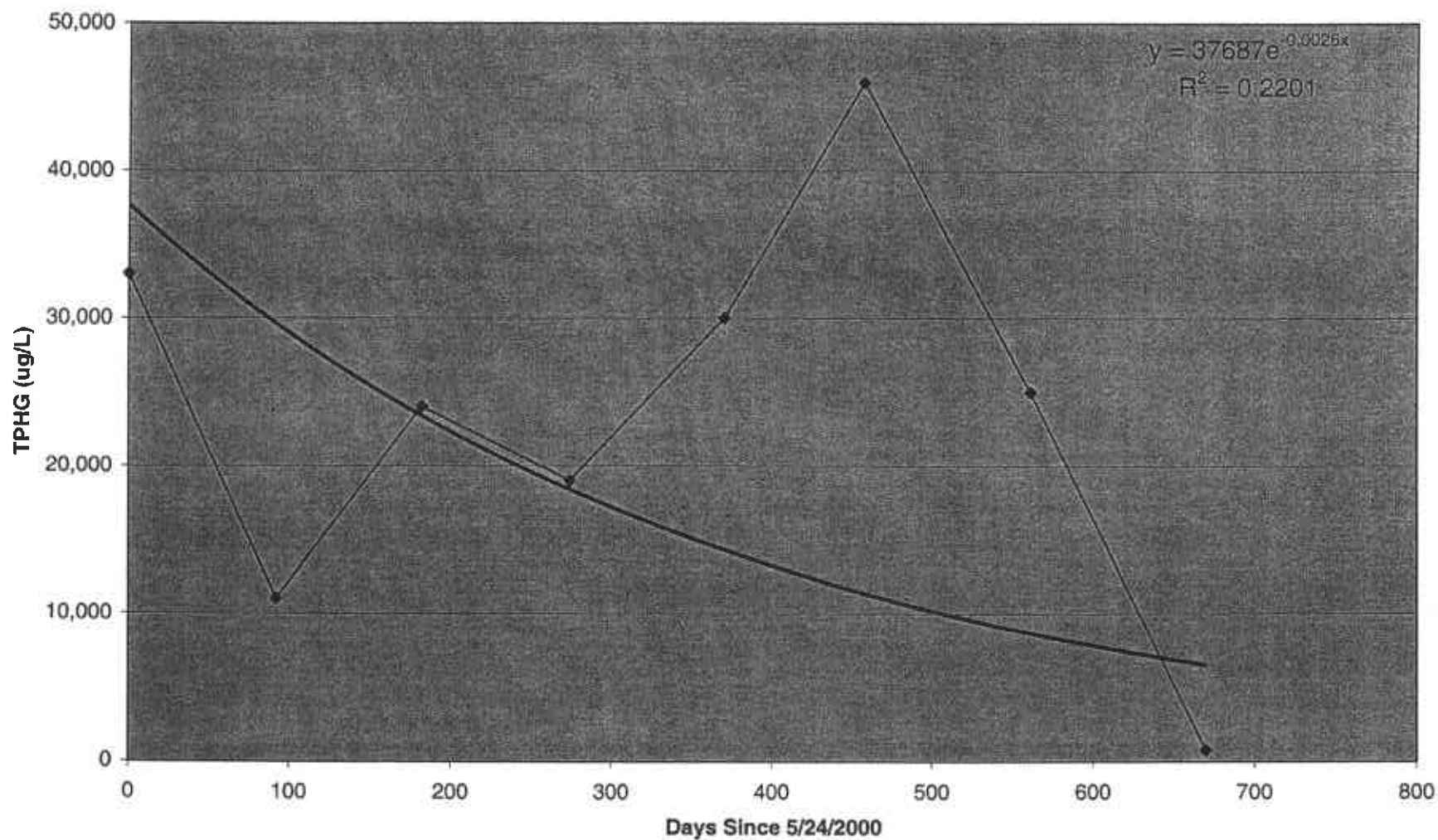
MTBE
(ug/L)

0	33,000
92	11,000
182	24,000
274	19,000
370	30,000
457	46,000
561	25,000
670	770

0	340,000
153	269,000
223	117,000
637	74,000
729	32,000
819	35,000
911	51,000
1,007	110,000
1,094	70,000
1,198	37,000
1,307	20,000

Assumed $<x = x/2$

**TPHg Concentrations in Groundwater (Well MW-1)
Former Texaco Station 211285, 15595 Washington Street, San Lorenzo, CA**



Predicted Time to Cleanup of TPH in Well MW-1, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

Calculate "time to cleanup" given the first-order decay equation:

$$y = b e^{ax} \implies x = \ln(y/b) / a$$

Site: Former Texaco Site 211285
 Well: MW-1
 Constituent: TPH

$$y = 37687 e^{-0.0026x} \implies x = \ln(37687) / -0.0026$$

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
5/24/2000	0	37,687
5/24/2001	365	14,590
5/24/2002	730	5,648
5/24/2003	1,095	2,187
5/24/2004	1,461	844
5/24/2005	1,826	327
5/24/2006	2,191	127
5/24/2007	2,556	49

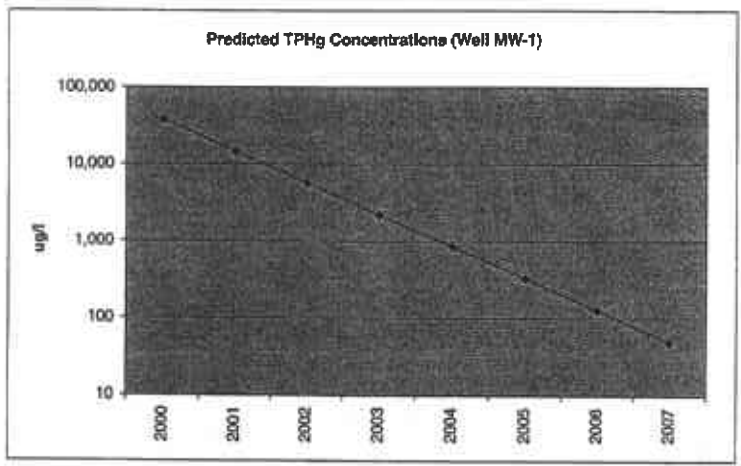
Given

Water Quality Objective:	y	10 ug/L
Constant:	b	37,687
Constant:	a	-0.0026
Date of first sample:		5/24/2000

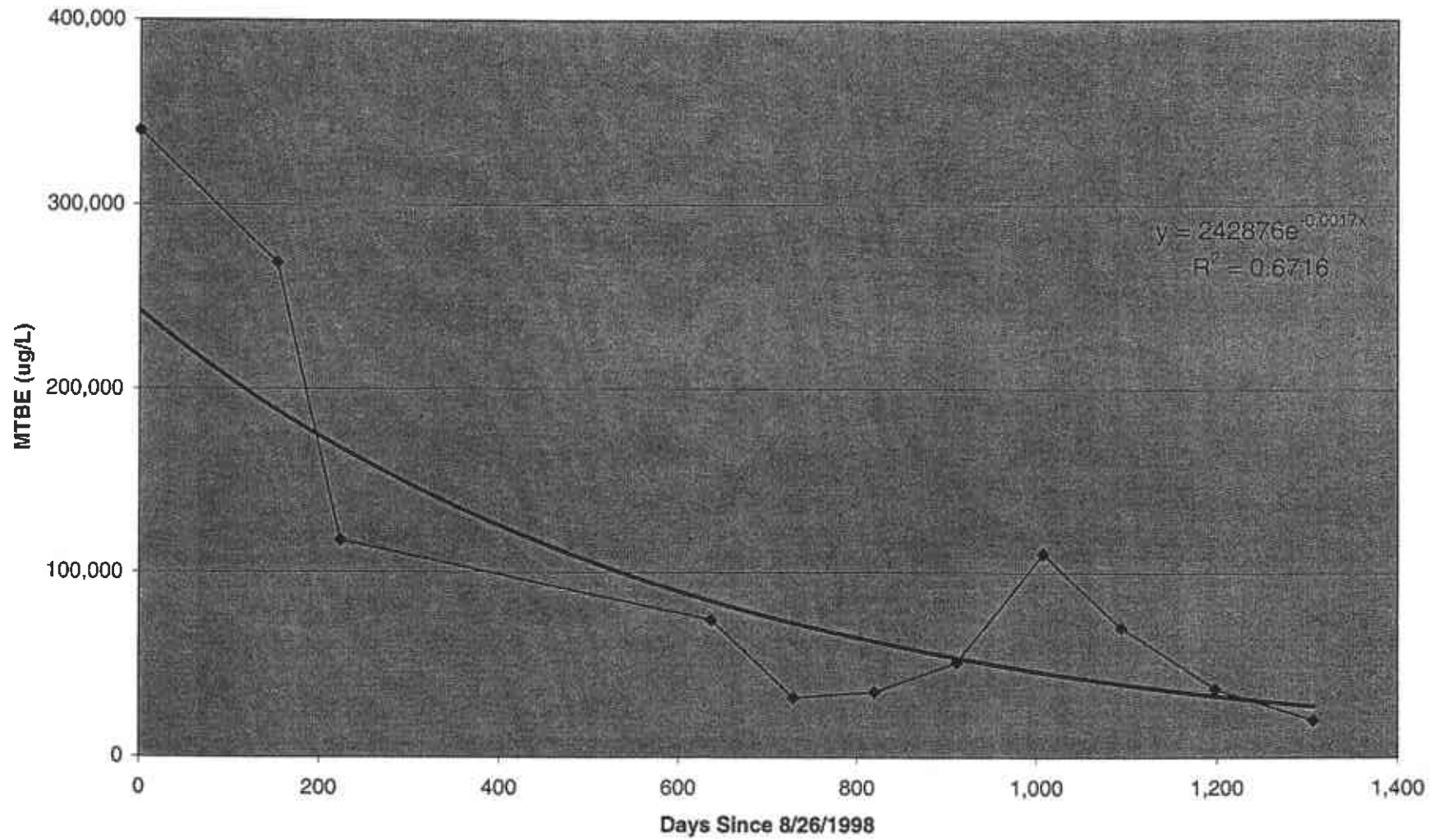
Calculate

Days from first sample:	x	2,548 Days
Years from first sample:		7.0 Years
Estimated date of cleanup:		May-2007

Calculated Half Life = $-\ln(2)/a \approx \frac{-0.693}{-0.0026} = 267$ Days



MTBE Concentrations in Groundwater (Well MW-1)
Former Texaco Station 211285, 15595 Washington Street, San Lorenzo, CA



Predicted Time to Cleanup of MTBE in Well MW-1, Former Texaco Site 211258, 15595 Washington Street, San Lorenzo, California

Calculate "time to cleanup" given the first-order decay equation:

$$y = b e^{-ax} \implies x = \ln(y/b) / -a$$

Site: Former Texaco Site 211258
 Well: MW-1
 Constituent: MTBE

$$y = 242876 e^{-0.0017x} \implies x = \ln(y/242876) / -0.0017$$

Given

Water Quality Objective: y [redacted] ug/L
 Constant: b [redacted]
 Constant: a [redacted]
 Date of first sample: [redacted]

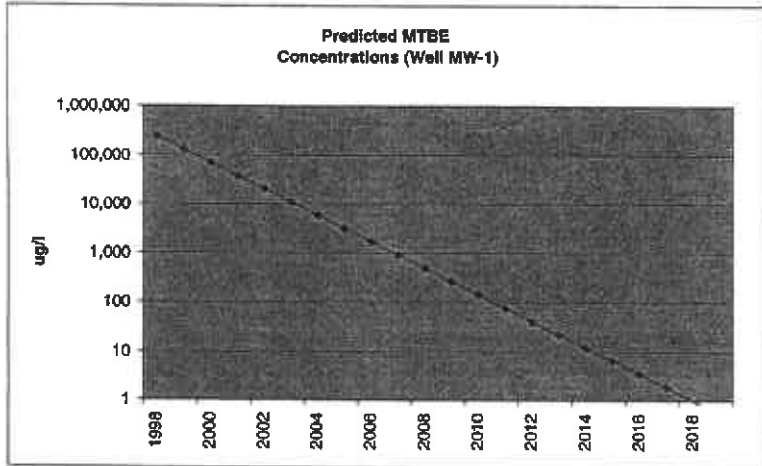
Calculate

Days from first sample: x [redacted] 6,348 Days
 Years from first sample: [redacted] 17.4 Years
 Estimated date of cleanup: [redacted] Jan-2016

Calculated Half Life = $-\ln(2)/a$ [redacted] 408 Days

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
8/26/1998	0	242,876
8/26/1999	365	130,588
8/26/2000	731	70,095
8/26/2001	1,096	37,688
8/26/2002	1,461	20,264
8/26/2003	1,826	10,896
8/26/2004	2,192	5,848
8/26/2005	2,557	3,144
8/26/2006	2,922	1,691
8/26/2007	3,287	909
8/26/2008	3,653	488
8/26/2009	4,018	262
8/26/2010	4,383	141
8/26/2011	4,748	76
8/26/2012	5,114	41
8/26/2013	5,479	22
8/26/2014	5,844	12
8/26/2015	6,209	6.3
8/26/2016	6,575	3.4
8/26/2017	6,940	1.8
8/26/2018	7,305	1.0
8/26/2019	7,670	0.5



MW-2

Raw Data

Date	GWE	TPH-G (ug/L)	MTBE (ug/L)
11/12/1992		<10	
3/24/1994	14.22	<50	
12/15/1995	17.47	<50	
8/26/1998	13.67	<50	210,000
1/26/1999	14.78	<2000	9,450
4/6/1999	14.79	<1000	209,000
5/24/2000	14.72	46,000	180,000
8/24/2000	13.55	21,000	70,000
11/22/2000	13.70	29,000	43,000
2/22/2001	15.42	20,000	61,000
5/29/2001	14.04	9,100	24,000
8/24/2001	13.32	8,700	12,000
12/6/2001	14.66	11,000	22,000
3/25/2002	15.08	<50	25,000

Edited Data

Date	GWE	TPH-G (ug/L)	MTBE (ug/L)
11/12/1992		5	
3/24/1994	14.22	25	
12/15/1995	17.47	25	
8/26/1998	13.67	25	210,000
1/26/1999	14.78	1,000	9,450
4/6/1999	14.79	500	209,000
5/24/2000	14.72	46,000	180,000
8/24/2000	13.55	21,000	70,000
11/22/2000	13.70	29,000	43,000
2/22/2001	15.42	20,000	61,000
5/29/2001	14.04	9,100	24,000
8/24/2001	13.32	8,700	12,000
12/6/2001	14.66	11,000	22,000
3/25/2002	15.08	25	25,000

Days Since
5/24/2000

TPH-G (ug/L)
0
92
182
274
370
457
561
670

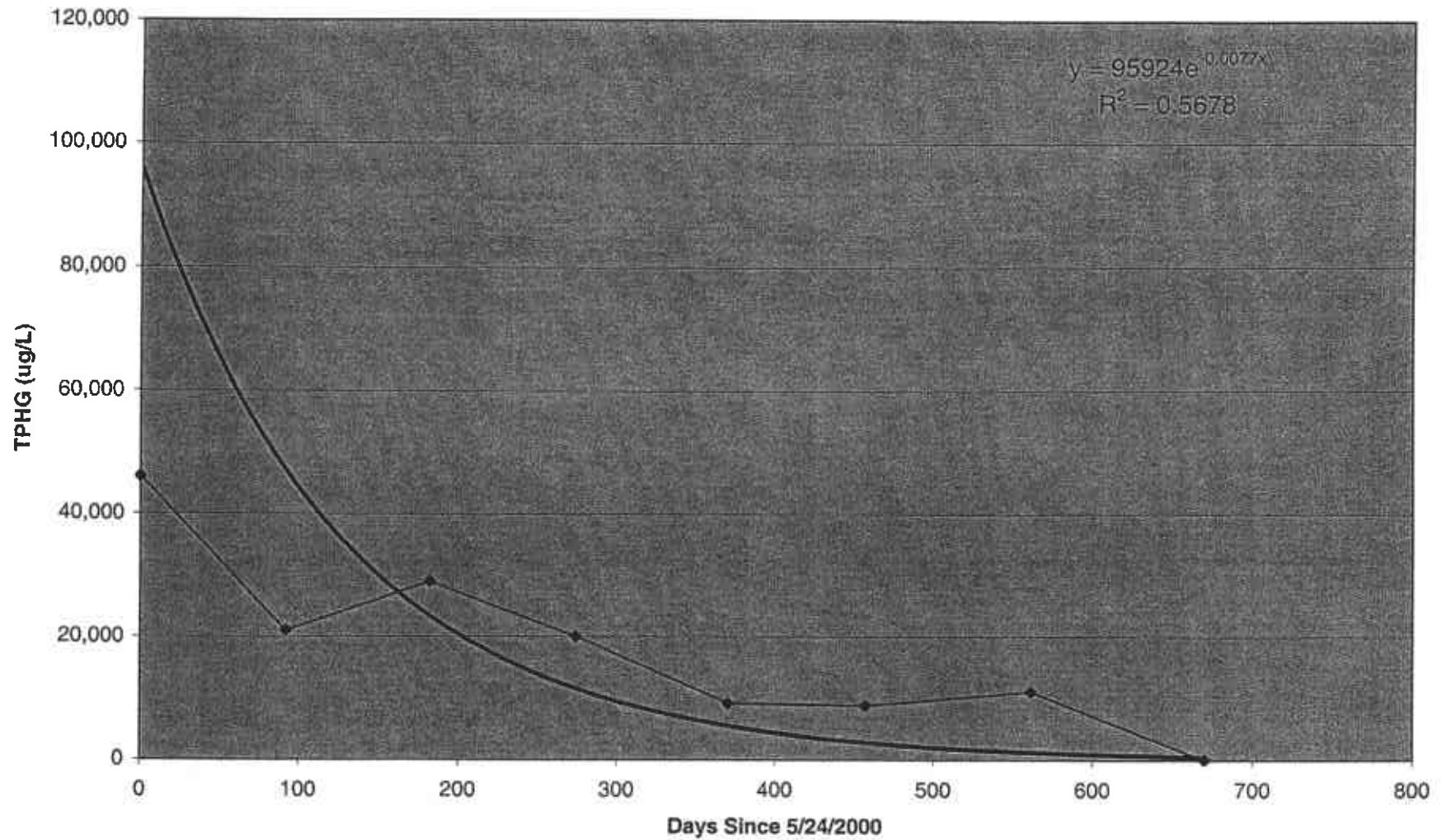
Days Since
4/6/1999

MTBE (ug/L)
0
414
506
596
688
784
871
975
1,084

Assumed $<x = x/2$

Used this data set because the 1/26/1999 data appears anomalous and disrupts the curve substantially.

TPHg Concentrations in Groundwater (Well MW-2)
Former Texaco Station 211285, 15595 Washington Street, San Lorenzo, CA



Predicted Time to Cleanup of TPHg in Well MW-2, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

Calculate "time to cleanup" given the first-order decay equation:

$$y = b e^{-at} \implies x = \ln(y/b) / -a$$

Site: Former Texaco Site 211285
 Well: MW-2
 Constituent: TPHg

$$y = 95924 e^{-0.0077x} \implies x = \ln(y/95924) / -0.0077$$

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
5/24/2000	0	95,924
5/24/2001	365	5,772
5/24/2002	730	347
5/24/2003	1,095	21

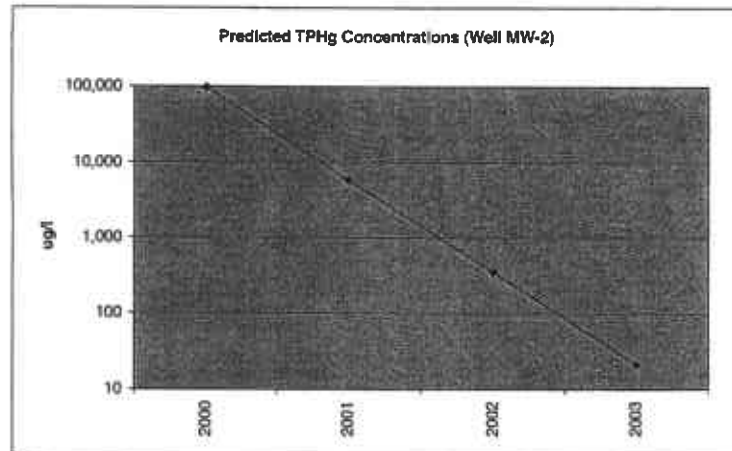
Given

Water Quality Objective:	y	20 ug/L
Constant:	b	95924
Constant:	a	0.0077
Date of first sample:		5/24/2000

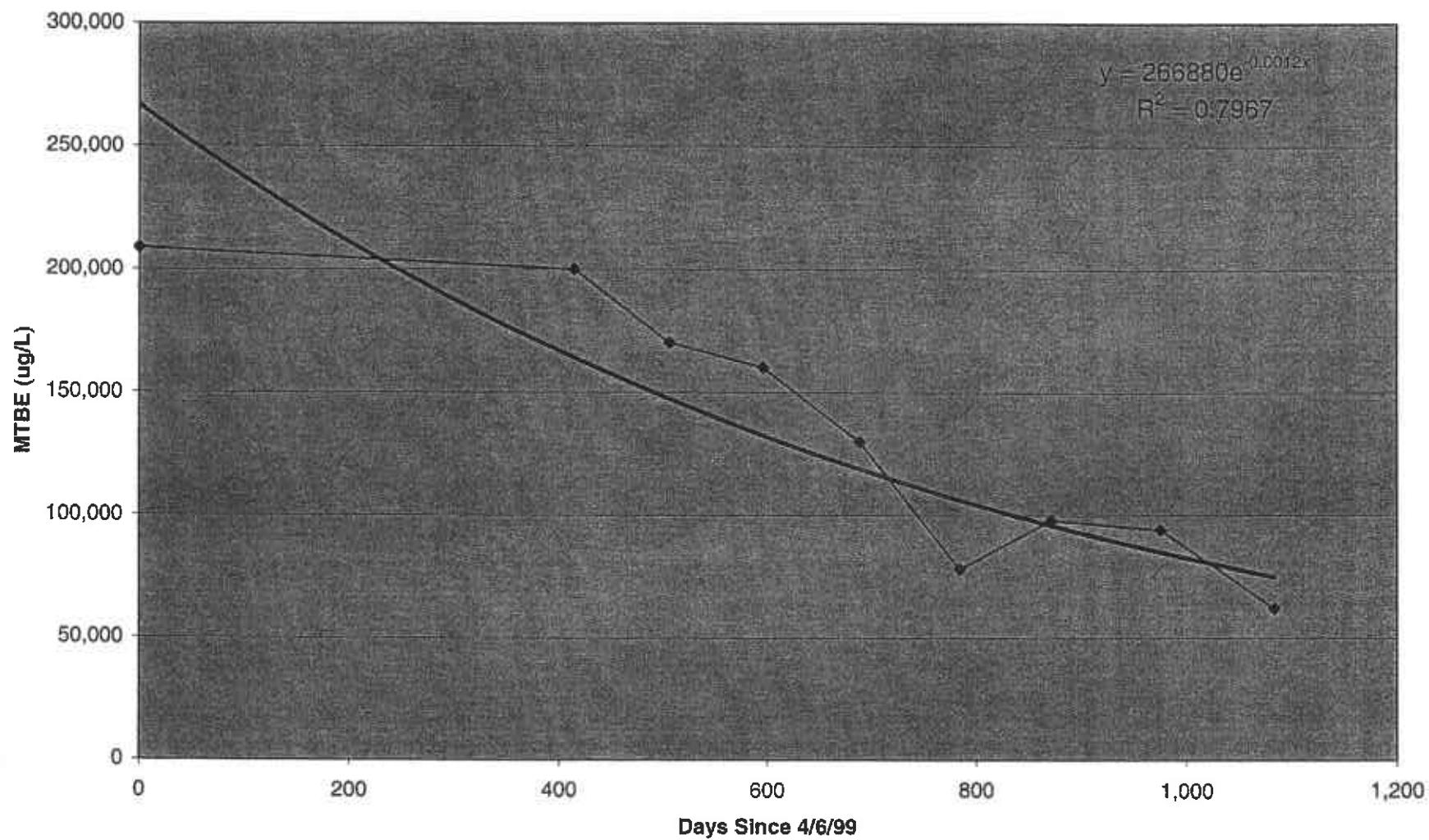
Calculate

Days from first sample:	x	982 Days
Years from first sample:		2.7 Years
Estimated date of cleanup:		Jan-2003

Calculated Half Life = $-\ln(2)/a$
 90 Days



MTBE Concentrations in Groundwater (Well MW-2)
Former Texaco Station 211285, 15595 Washington Street, San Lorenzo, CA



Predicted Time to Cleanup of MTBE In Well MW-2, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

Calculate "time to cleanup" given the first-order decay equation:

$$y = b e^{-ax} \implies x = \ln(y/b) / -a$$

Site: Former Texaco Site 211285
 Well: MW-2
 Constituent: MTBE

$$y = 266880 e^{-0.0012x} \implies x = \ln(y/266880) / -0.0012$$

Given

Water Quality Objective:	y	5 ug/L
Constant:	b	266880
Constant:	a	-0.0012
Date of first sample:		4/6/1999

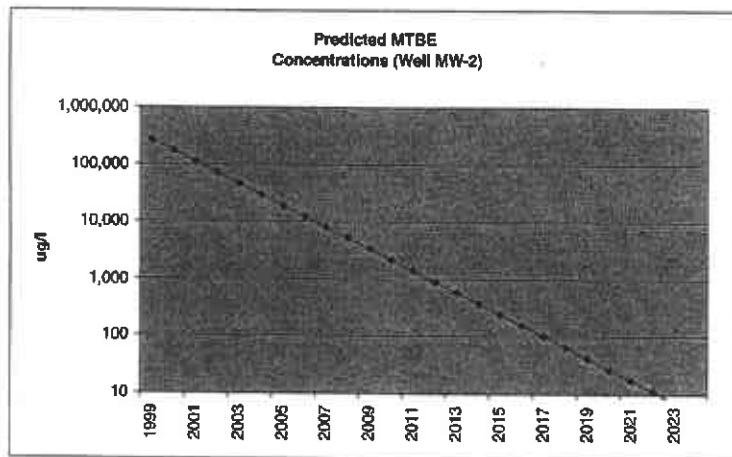
Calculate

Days from first sample:	x	9,071 Days
Years from first sample:		24.9 Years
Estimated date of cleanup:		Feb-2024

Calculated Half Life = $-\ln(2)/a$
 578 Days

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
4/6/1999	0	266,880
4/6/2000	366	172,018
4/6/2001	731	111,008
4/6/2002	1,096	71,636
4/6/2003	1,461	46,229
4/6/2004	1,827	29,797
4/6/2005	2,192	19,229
4/6/2006	2,557	12,409
4/6/2007	2,922	8,008
4/6/2008	3,288	5,161
4/6/2009	3,653	3,331
4/6/2010	4,018	2,149
4/6/2011	4,383	1,387
4/6/2012	4,749	894
4/6/2013	5,114	577
4/6/2014	5,479	372
4/6/2015	5,844	240
4/6/2016	6,210	154.9
4/6/2017	6,575	99.9
4/6/2018	6,940	64.5
4/6/2019	7,305	41.6
4/6/2020	7,671	26.8
4/6/2021	8,036	17.3
4/6/2022	8,401	11.2
4/6/2023	8,766	7.2
4/6/2024	9,132	4.6



MW-3

Raw Data

Date	GWE	TPH-G (ug/L)	MTBE (ug/L)
11/12/1992		69	
3/24/1994	14.04	<50	
12/15/1995	14.42	<50	
8/26/1998	13.45	<500	99,000
1/26/1999	14.74	<500	19,800
4/6/1999	14.74	<1000	151,000
5/24/2000	14.48	48,000	200,000
8/24/2000	13.32	52,000	170,000
11/22/2000	13.48	69,000	160,000
2/22/2001	14.98	30,000	130,000
5/29/2001	13.80	29,000	78,000
8/24/2001	13.10	37,000	98,000
12/6/2001	14.50	33,000	94,000
3/25/2002	14.94	<50	62,000

Edited Data

Date	GWE	TPH-G (ug/L)	MTBE (ug/L)
11/12/1992		69	
3/24/1994	14.04	25	
12/15/1995	14.42	25	
8/26/1998	13.45	250	99,000
1/26/1999	14.74	250	19,800
4/6/1999	14.74	500	151,000
5/24/2000	14.48	48,000	200,000
8/24/2000	13.32	52,000	170,000
11/22/2000	13.48	69,000	160,000
2/22/2001	14.98	30,000	130,000
5/29/2001	13.80	29,000	78,000
8/24/2001	13.10	37,000	98,000
12/6/2001	14.50	33,000	94,000
3/25/2002	14.94	25	62,000

Days Since
11/22/2000

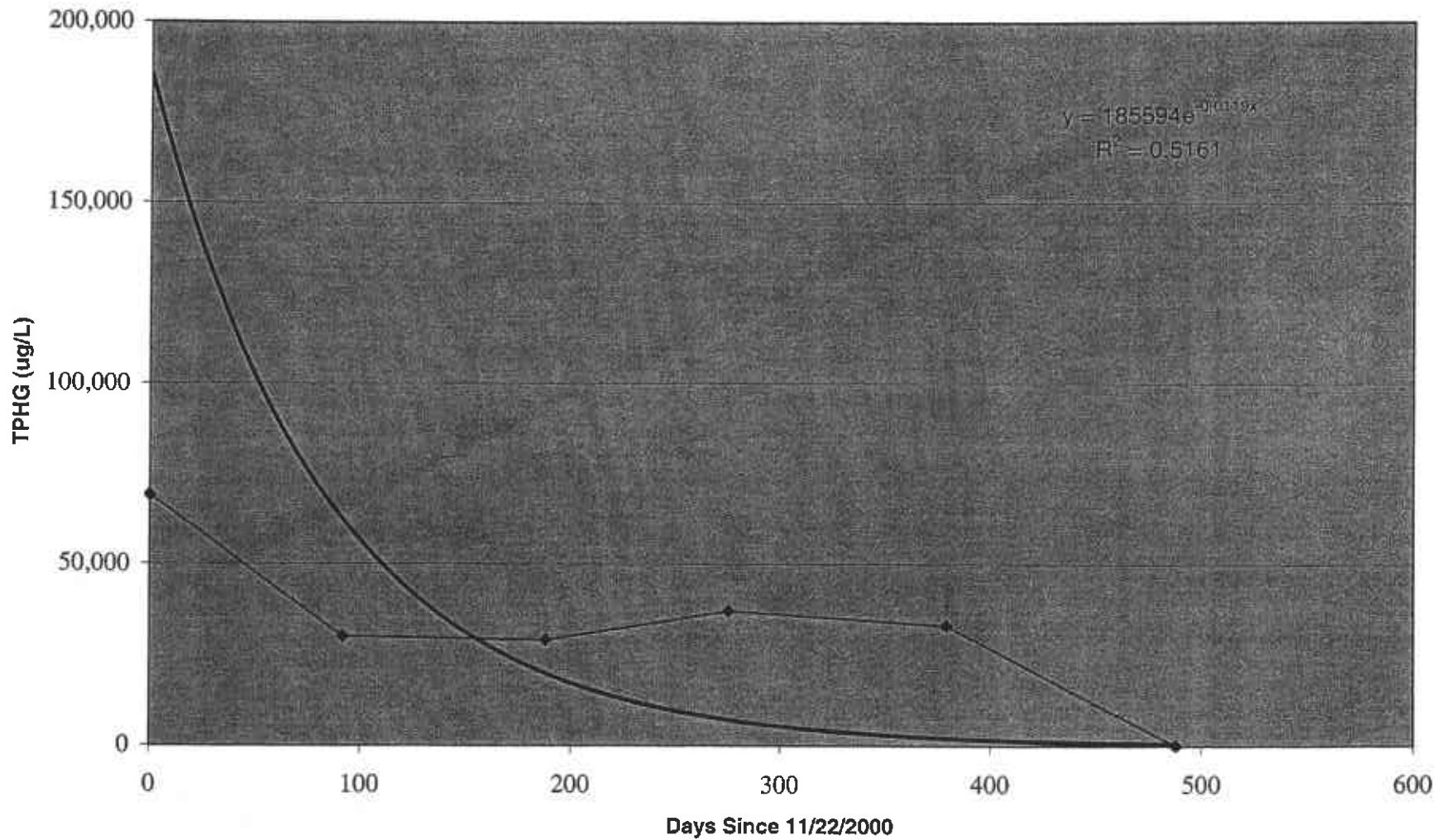
TPH-G (ug/L)	
0	69,000
92	30,000
188	29,000
275	37,000
379	33,000
488	25

Days Since
5/24/2000

MTBE (ug/L)	
0	200,000
92	170,000
182	160,000
274	130,000
370	78,000
457	98,000
561	94,000
670	62,000

Assumed <x = x/2

TPHG Concentrations in Groundwater (Well MW-3)
Former Texaco Station 211285, 15595 Washington Street, San Lorenzo, CA



Predicted Time to Cleanup of TPHg In Well MW-3, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

Calculate "time to cleanup" given the first-order decay equation:

$$y = b e^{ax} \implies x = \ln(y/b) / a$$

Site: Former Texaco Site 211285
 Well: MW-3
 Constituent: TPHg

$$y = 185594 e^{-0.0119x} \implies x = \ln(y/185594) / -0.0119$$

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
5/24/2000	0	185,594
5/24/2001	365	2,411
5/24/2002	730	31

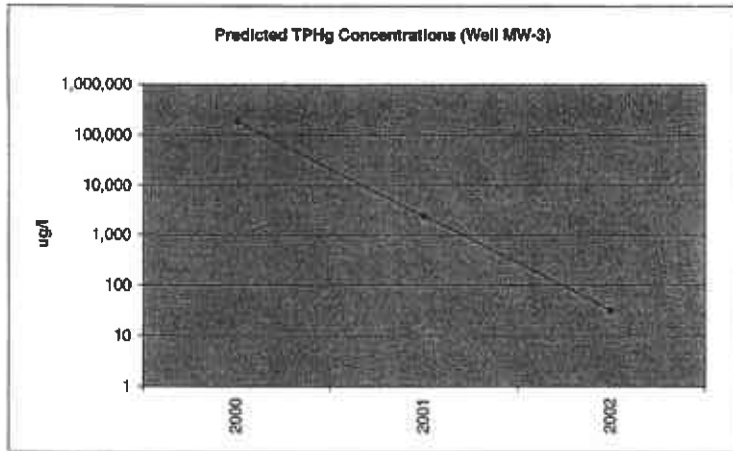
Given:

Water Quality Objective:	y	50 ug/L
Constant:	b	185594
Constant:	a	-0.0119
Date of first sample:		5/24/2000

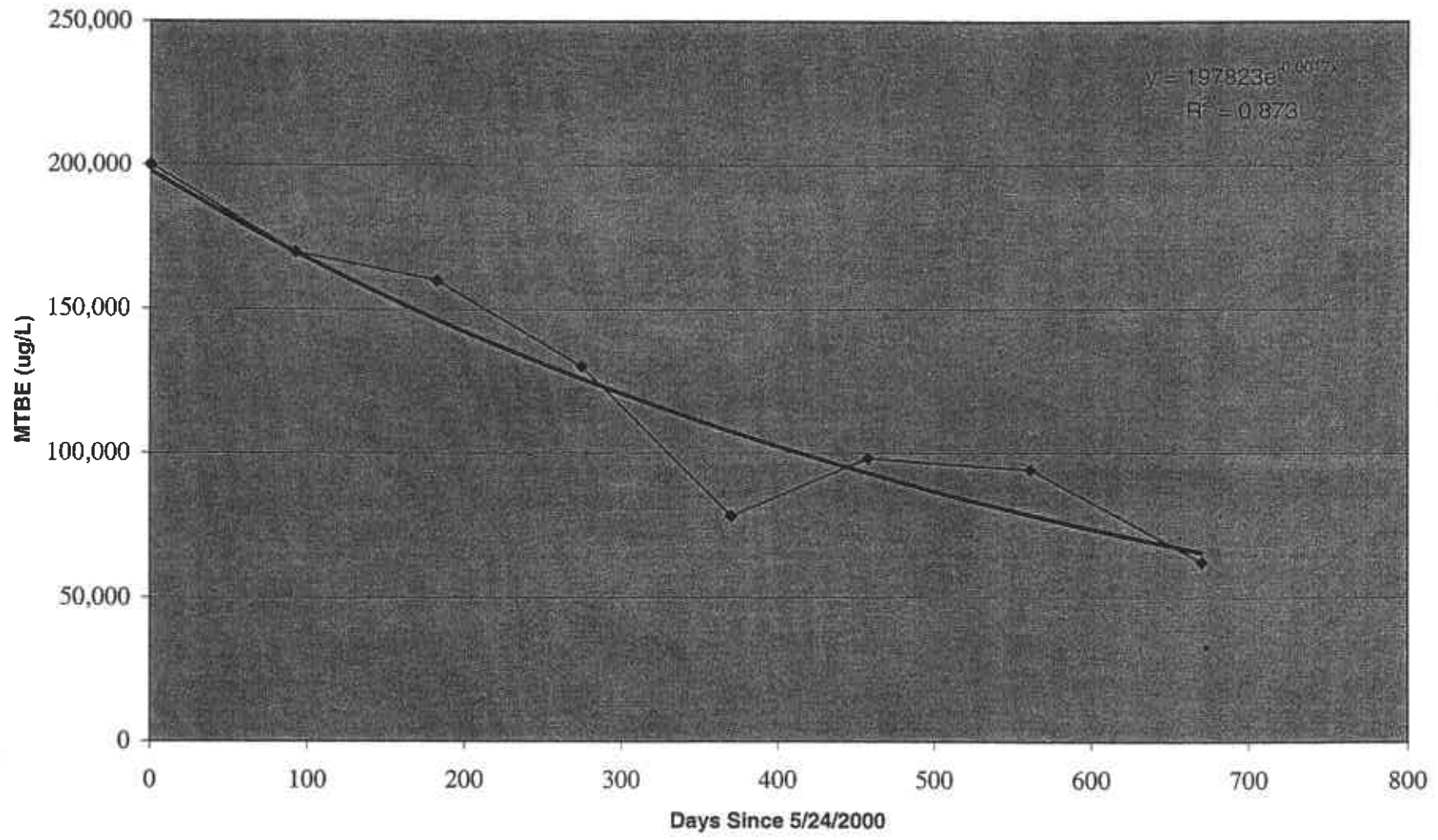
Calculate:

Days from first sample:	x	691 Days
Years from first sample:		1.9 Years
Estimated date of cleanup:		Apr-2002

Calculated Half Life = $-\ln(2)/a$ = 58 Days



MTBE Concentrations in Groundwater (Well MW-3)
Former Texaco Station 211285, 15595 Washington Street, San Lorenzo, CA



Predicted Time to Cleanup of MTBE in Well MW-3, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

Calculate "time to cleanup" given the first-order decay equation:

$$y = b e^{ax} \implies x = \ln(y/b) / a$$

Site: **Former Texaco Site 211285**
 Well: **MW-3**
 Constituent: **MTBE**

$$y = 197823 e^{-0.0017x} \implies x = \ln(y/197823) / -0.0017$$

Given

Water Quality Objective: y ug/L
 Constant: b
 Constant: a
 Date of first sample:

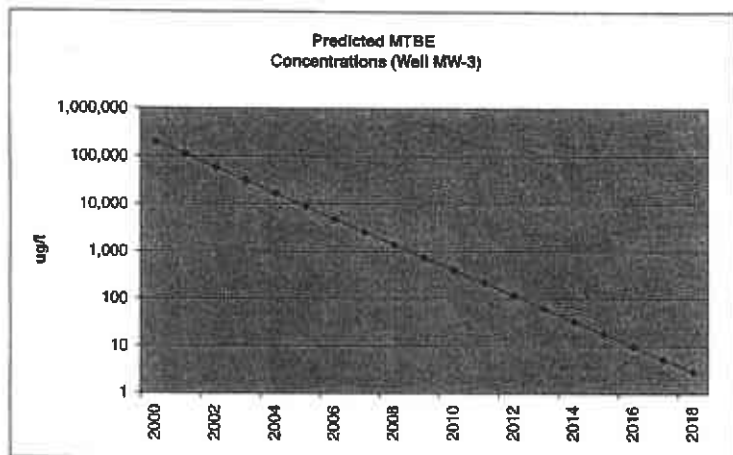
Calculate

Days from first sample: x Days
 Years from first sample: Years
 Estimated date of cleanup:

Calculated Half Life = $-\ln(2)/a$ Days

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
5/24/2000	0	197,823
5/24/2001	365	106,363
5/24/2002	730	57,190
5/24/2003	1,095	30,749
5/24/2004	1,461	16,505
5/24/2005	1,826	8,874
5/24/2006	2,191	4,772
5/24/2007	2,556	2,566
5/24/2008	2,922	1,377
5/24/2009	3,287	740
5/24/2010	3,652	398
5/24/2011	4,017	214
5/24/2012	4,383	115
5/24/2013	4,748	62
5/24/2014	5,113	33
5/24/2015	5,478	18
5/24/2016	5,844	10
5/24/2017	6,209	5.2
5/24/2018	6,574	2.8



Predicted BTX Concentrations in SB-1, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

Site: Former Texaco Site 211285
 Well: SB-1
 Constituent: Benzene, Toluene and Xylenes

MW-1 TPHg MW-1 MTBE MW-2 TPHg MW-2 MTBE MW-3 TPHg MW-3 MTBE
 Predicted Half-Life: 267 408 90 278 58 408 (from spreadsheets)
 Average half-life: 302 days

Assumed Half Life: 302 Days

Date	Predicted Concentration		
	Benzene	Toluene	Xylenes
8/8/1996	220	390	680 (Initial Concentration)
6/6/1997	110	195	340
4/4/1998	55	97.5	170
1/31/1999	28	49	85
11/29/1999	14	24	43
9/26/2000	6.9	12	21
7/25/2001	3.4	6.1	11
5/23/2002	1.7	3.0	5.3
3/21/2003	0.9	1.5	2.7
1/17/2004		0.8	1.3
11/14/2004			0.7

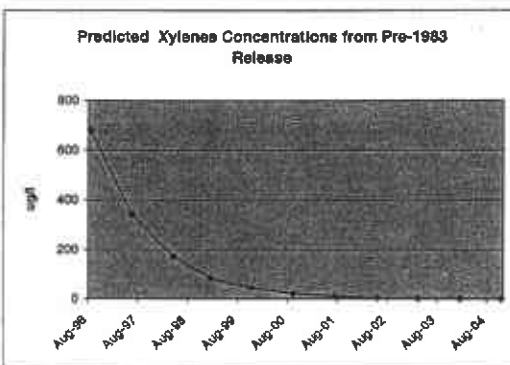
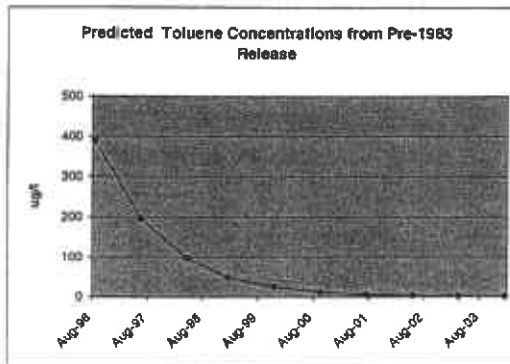
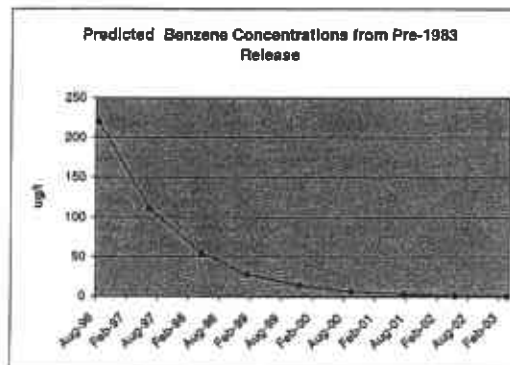


EXHIBIT
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JPodawiltz

From: Streich, Karen (stka) [stka@chevrontexaco.com]
Sent: Tuesday, July 29, 2003 10:53 AM
To: jpodawiltz@glynnfinley.com
Cc: Robbins, Jon (JONR); smacleod@cambria-env.com
Subject: FW: Former Texaco 211285 - 15595 Washington Ave, San Lorenzo

Jeff,

Here is the email I sent to Eva Chu at Alameda County offering to meet and discuss this site and her response that Alameda County did not want to discuss it. I thought you might want to have this in your files re: the petition.

Karen

Karen Streich
Project Manager, Retail Business Unit
925-842-1589
stka@chevrontexaco.com
6001 Bollinger Canyon Rd, L4050
P.O. Box 6012
San Ramon, CA 94583-2324

-----Original Message-----

From: Chu, Eva, Env. Health [mailto:EChu@co.alameda.ca.us]
Sent: Thursday, May 29, 2003 3:28 PM
To: Streich, Karen (stka)
Subject: RE: Former Texaco 211285 - 15595 Washington Ave, San Lorenzo

Donna doesn't want to meet. We really don't know what a "preponderance of evidence" is. I suppose it's up to ChevronTexaco to convince us. In any case, she doesn't feel it's possible to de-designate anyone once listed **and** the case not ever closed. And a portion of the case cannot be closed (no precedence). As far as she's concerned, a secondary RP is a property owner who never had control over the USTs and a leak was never identified to have occurred at the time he owned the property. I hope this will not be an inconvenience. We plan to have M Mohammadian be the primarily responsible party to assess and remediate the MTBE plume. Since he's almost in the fund, it may work out for you.

-----Original Message-----

From: Streich, Karen (stka) [mailto:stka@ChevronTexaco.com]
Sent: Wednesday, May 28, 2003 2:00 PM
To: echu@co.alameda.ca.us; ddrogos@co.alameda.ca.us; sseery@co.alameda.ca.us
Cc: smacleod@cambria-env.com; Streich, Karen (stka)
Subject: Former Texaco 211285 - 15595 Washington Ave, San Lorenzo

Eva, Donna, and Scott,

Eva called me last week about moving forward with re-designating ChevronTexaco as an RP for the site at 15595 Washington Avenue in San Lorenzo, California.

I would appreciate it if you would take the time to meet with me and Scott MacLeod of Cambria prior to

8/18/2003

issuing that letter. I know Eva has been re-assigned the site, but I'm copying Scott Seery on this email in case it's appropriate for him to attend the meeting, given his significant historical knowledge of the site.

The objective of the meeting is to discuss how we can help confirm and support Alameda County's original decision to de-designate Texaco as an RP for this site. Last year during the petition to the SWRCB, Scott Seery and I had discussed having ChevronTexaco look at whether there is additional analysis that can be done to help strengthen the "preponderance of evidence, that constituents from that party's release. . . do not contribute to the need for cleanup at the site" that is required to de-designate an RP. We have been reviewing the data, have some ideas, and have some additional evaluation and suggestions that we would like to present and discuss with you.

Proposed agenda/discussion items for the meeting are:

- What is definition of "preponderance of evidence" from Alameda County and SWRCB perspective
- Review additional data evaluation we have completed related to
 - Groundwater gradients
 - Attenuation rates
 - Closure strategy and criteria for similar sites
- Alameda County closure strategy and criteria in 1986 and today (are there other similar Alameda County sites that we can/should look at?)
- Next steps
 - Is there additional evaluation we can perform or data we can collect to help support the position that releases prior to Texaco tenure do not contribute to the need for cleanup at the site?
 - If not, is there opportunity to be a secondary RP (as Eva suggested in our phone conversation) and what does that mean for ChevronTexaco in terms of responsibility and potential violations by the primary RPs?

I understand from conversations with Scott Seery last year that this site has taken a significant amount of effort from both Alameda County and the SWRCB. I would really appreciate you taking the time to meet with us and discuss whether there are ways we can help support the County's original decision, before going down a path that just re-designates Texaco as an RP at this site.

Scott MacLeod and I would be available to meet:

Mon 6/2 and Fri 6/9

Tues 6/10, Wed 6/11, Thurs 6/12 (in the afternoon), and Fri 6/13

Mon 6/16 (in the afternoon), Tues 6/17, Thurs 6/19, and Fri 6/20

I look forward to hearing from you at your earliest convenience.

Thanks,
Karen

Karen Streich
Project Manager, Retail Business Unit
925-842-1589
stka@chevrontexaco.com
6001 Bollinger Canyon Rd, L4050
P.O. Box 6012
San Ramon, CA 94583-2324

8/18/2003

Docket No. **SWRCB FILE NO.:**

PROOF OF SERVICE BY HAND DELIVERY

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I, JIM EVANS, the undersigned, hereby certify and declare under penalty of perjury that the following statements are true and correct:

1. I am over the age of 18 years and am not a party to the within cause.
2. My business address is CCX Couriers, 3313 Vincent Road, Suite 250, Pleasant Hill, CA 94523.
3. On October 3, 2003 I served a true and correct copy of the attached

document(s) entitled exactly:

SUPPLEMENTAL PETITION OF CHEVRONTEXACO CORP. FOR REVIEW OF JULY 7, 2003 LETTER FROM ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DESIGNATING CHEVRON TEXACO AND AGNES CALLERI AS SECONDARY RESPONSIBLE PARTIES (REVIEW PURSUANT TO STATE WATER CONTROL BOARD RESOLUTION NO. 88-23)

by placing it in an addressed, sealed envelope and delivering it to the following:

Attn: David Boyers, Esq.
Office of Chief Counsel
State of California
State Water Resources Control Board
1001 "P" Street, 22nd Floor
Sacramento, CA 95814

Executed this 3rd day of October, 2003 at Walnut Creek, California.

JIM EVANS

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Docket No. **SWRCB FILE NO.:**
PROOF OF SERVICE BY MAIL

I, Gina M. Bentley, the undersigned, hereby certify and declare under penalty of perjury that the following statements are true and correct:

1. I am over the age of 18 years and am not a party to the within cause.
2. My business address is One Walnut Creek Center, 100 Pringle Avenue, Suite 500, Walnut Creek, CA 94596
3. I am familiar with my employer's mail collection and processing practices; know that said mail is collected and deposited with the United States Postal Service on the same day it is deposited in interoffice mail; and know that postage thereon is fully prepaid.
4. Following said practice, on October 3, 2003 I served a true and correct copy of the attached document entitled exactly **SUPPLEMENTAL PETITION OF CHEVRONTEXACO CORP. FOR REVIEW OF JULY 7, 2003 LETTER FROM ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DESIGNATING CHEVRONTEXACO AND AGNES CALLERI AS SECONDARY RESPONSIBLE PARTIES (REVIEW PURSUANT TO STATE WATER CONTROL BOARD RESOLUTION NO. 88-23)** by placing it in an addressed, sealed envelope and depositing it in regularly maintained interoffice mail to the following:

Please see attached Service List

Executed this 3rd day of October, 2003 at Walnut Creek, California.

Gina M. Bentley

