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Alameda County

NOV 18 2003

Environmental Health

Attorneys for Petitioner
 ChevronTexaco Corp.

STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

)	SWRCB FILE NO. :
)	
)	CHEVRONTEXACO CORP.'S
In Re:)	RESPONSE TO AGNES CALLERI'S
)	PETITION FOR REVIEW OF THE
Alameda County Health Care Services)	ALAMEDA COUNTY HEALTH CARE
Agency Record ID: RO0000374)	SERVICES AGENCY'S JULY 7, 2003
Letter dated July 7, 2003, issued to)	DESIGNATION OF HER AS
ChevronTexaco re 15595 Washington)	SECONDARY RESPONSIBLE PARTY
Ave., San Lorenzo)	
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)	
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)	

ChevronTexaco Corp. (hereinafter "ChevronTexaco") agrees that Agnes Calleri, as well as ChevronTexaco, have been improperly designated as secondary responsible parties for the investigation and cleanup of the soil and groundwater at the 15595 Washington Avenue, San Lorenzo, site. ChevronTexaco concurs with the legal arguments presented in Sections I & II of the Memorandum of Points and Authorities contained in Ms. Calleri's Petition and requests the Board direct the Alameda County

Health Care Services Agency to remove ChevronTexaco and Agnes Calleri from the list of secondary responsible parties.

SERVICE ON ALAMEDA COUNTY HEALTH CARE SERVICES AND OTHER

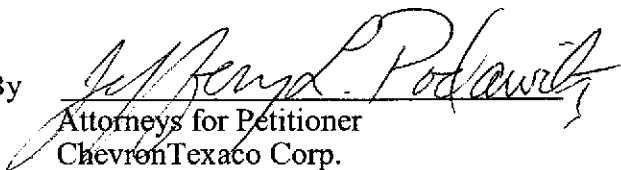
INTERESTED PARTIES

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

Dated: November 14, 2003

GLYNN & FINLEY, LLP

By


Attorneys for Petitioner
ChevronTexaco Corp.

1 Docket No. SWRCB FILE NO.:

2 PROOF OF SERVICE BY MAIL AND FACSIMILE

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

5 1. I am over the age of 18 years and am not a party to the within cause.

6 2. My business address is One Walnut Creek Center, 100 Pringle Avenue,
7 Suite 500, Walnut Creek, CA 94596

8 3. I am familiar with my employer's mail collection and processing practices;
9 know that said mail is collected and deposited with the United States Postal Service on the same
10 day it is deposited in interoffice mail; and know that postage thereon is fully prepaid.

11 4. Following said practice, on November 14, 2003 I served a true and correct
12 copy of the attached document entitled exactly CHEVRONTEXACO CORP.'S RESPONSE
13 TO AGNES CALLER'S PETITION FOR REVIEW OF THE ALAMEDA COUNTY
14 HEALTH CARE SERVICES AGENCY'S JULY 7, 2003 DESIGNATION OF HER AS
15 SECONDARY RESPONSIBLE PARTY by placing it in an addressed, sealed envelope and
16 depositing it in regularly maintained interoffice mail to the following:

17 Ms. Terry Brazell
18 Division of Water Quality
19 State Water Resources Control Board
20 P.O. Box 2231
21 Sacramento, CA 95812
(916) 341-5808 Fax
(916) 341-5645 Telephone
(Also served via facsimile 11/14/03)

22 Executed this 14th day of November, 2003 at Walnut Creek, California.

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24 _____
Gina M. Bentley
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1 Docket No. SWRCB FILE NO.:

2 PROOF OF SERVICE BY MAIL

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16 depositing it in regularly maintained interoffice mail to the following:

17 *Please see attached Service List*

18 Executed this 14th day of November, 2003 at Walnut Creek, California.

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21 _____
Gina M. Bentley
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1 **SERVICE LIST IN RE**
2 **Alameda County Health Care Services**
3 **Agency Record ID: RO0000374**
4 **Letter dated July 7, 2003, issued to**
5 **Chevron Texaco re 15595 Washington Ave., San Lorenzo**

6 Mr. Ariu Levi
7 Chief Project Director
8 Alameda Co. Environmental Health Services
9 Environmental Protection
10 1131 Harbor Bay Parkway, Suite 250
11 Alameda, CA 94502-6577

Mehdi Mohammadian
Cal Gas
15595 Washington Avenue
San Lorenzo, CA 94580

12 Marjorie Kayner
13 Bertram Kubo Trust
14 20321 Via Espana
15 Salinas, CA 93908-1261

Jennifer Jordan
State Water Resources Control Board
P.O. Box 944212
Sacramento, CA 95814

16 Barney Chan
17 Hazardous Material Specialist
18 Alameda County Health Care Services
19 Agency
20 Environmental Health Services, Environmental
21 Protection
22 1131 Harbor Bay Parkway, Suite 250
23 Alameda, CA 94502-6577

Loretta K. Barsamian
San Francisco Bay Reg. Water Quality
Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

24 Jeffrey Widman, Esq.
25 Attorney for Mehdi Mohammadian
26 101 Race Street
27 San Jose, CA 95126

Mary Taylor, Esq.
Attorney for Agnes Calleri
100 Pringle Avenue, Suite 630
Walnut Creek, CA 94596

28 Stephen Morse
San Francisco Bay Reg. Water Quality
Control Board
1515 Clay Street, Suite 1400
San Francisco, CA 94612

Mr. David Boyers
Office of Chief Counsel
State Water Resources Control Board
1001 I Street 22nd Floor
Sacramento, CA 95814