


October 1, 2003

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

Re: **Re-designation as RP**
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 site conditions with respect to case closure 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 are now unwilling to respond to the SWRCB directives. As a result, on July 7, 2003 the ACHSA re-designated ChevronTexaco and Agnes Calleri as secondary RPs. Our objective is to review the 1986 site data with respect to current Regional Water Quality Control Board – San Francisco Region (RWQCB) environmental screening levels and assess whether the site conditions at the end of Texaco's tenure meet current closure criteria. The site conditions at the time of Texaco's tenure and our analysis are presented below.

Site Conditions

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 Calleri 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. The site location is presented in Figure 1.

Texaco conducted a baseline assessment in 1986 to determine site conditions and identify potential environmental liabilities prior to selling the property to Mr. Bertram Kubo. Texaco drilled six borings and installed wells MW-1, MW-2 and MW-3 in three of the borings. A figure with boring and well locations is presented in Attachment A.

**Cambria
Environmental
Technology, Inc.**

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Emeryville, CA 94608
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Because the investigation objectives were to screen the site for potential liabilities to support a property transaction and not for a regulated environmental investigation, 3-point composite soil samples were analyzed from each boring. No hydrocarbons were detected in soil at detection limits of 10 mg/kg total petroleum hydrocarbons as gasoline (TPHg), 0.5 mg/kg benzene and toluene, and 1.0 mg/kg xylene isomers in the six samples analyzed.

Groundwater samples were collected from the 3 borings and 3 wells to assess potential impacts to groundwater. No benzene, toluene or xylenes were detected in wells MW-2 and MW-3, or in borings SB-2 and SB-3 at detection limits of 0.05 ug/l. Well MW-1 contained 82 ug/l xylenes and boring SB-1 contained 220 ug/l benzene, 390 ug/l toluene and 680 ug/l xylenes. Analytical data for soil and groundwater from the 1986 investigation are presented in Attachment B.

There is a more recent oxygenated fuels release (MTBE release) that post-dates Texaco's ownership of the site. The ACHSA named ChevronTexaco as a secondary RP for the contamination that is present on the site due to the pre-1983 release.

Sensitive Receptor Survey

Cambria reviewed the area surrounding the site for potential sensitive land use receptors that could be impacted by hydrocarbon releases at the site. The properties immediately adjacent to the site are primarily commercial and residential. Figure 2 presents surrounding land use.

Cambria also reviewed Department of Water Resources well logs for wells within a ½ mile radius of the site. Eleven total wells were identified within ½ mile of the site: 1 industrial well, 5 irrigation wells, 1 domestic well, 1 test well, and 3 wells of unknown or "other" use. No municipal or drinking water supply wells were identified. The nearest well is an irrigation well southwest (about 1/16-mile cross and down-gradient) of the site. This well is screened from 56 to 76 feet below grade (Texaco wells MW-1, MW-2 and MW-3 are screened from 5 to 15 feet below grade). The domestic well is over ¼ mile southeast (cross and up-gradient of the site). Because of the large distance to this well, it is not likely to be impacted by the hydrocarbons detected during Texaco's 1986 assessment. Well survey data are presented on Figure 3 and Table 1.

As indicated on Figure 2, San Lorenzo Creek is about 1/8 mile northwest of the site and flows west-southwestward. Due to the distance, it is unlikely that the low concentrations detected in the source area at the Texaco station in 1986 could impact the creek.

Based on the sensitive receptor survey data, no sensitive receptors were identified that would have been adversely impacted by hydrocarbons originating from the pre-1983 release.

Environmental Screening Levels

The SWRCB indicated that ChevronTexaco could be removed as a responsible party (RP) if "...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." To assess whether the release detected by Texaco in 1986 would have contributed to the need for cleanup at the site, we compared site conditions in 1986 to environmental screening levels (ESLs) presented in *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater* (July 2003, updated September 4, 2003) produced by the RWQCB.

Groundwater is not used as a drinking water source in the site vicinity and no municipal water supply wells were identified within ½-mile of the site. In addition, no surface water bodies were identified near the site that are likely to be impacted by the low hydrocarbon concentrations detected in 1986. Because it is unlikely that groundwater beneath or in the vicinity of the site would be used as a drinking water source in the foreseeable future, or that it would impact surface water, the appropriate ESL is based on potential impacts to indoor air. Table A presents maximum hydrocarbon concentrations detected in groundwater in the 1986 investigation and corresponding ESLs.

Table A – Hydrocarbon Concentrations and ESLs			
Analyte	Maximum Detection	ESL	Comments
Benzene	220 ug/l	530 to 1,900 ug/l	Below ESL
Toluene	390 ug/l	500,000 to 530,000 ug/l	Below ESL
Xylenes	680 ug/l	150,000 to 160,000 ug/l	Below ESL

ESL: *Groundwater Screening Levels for Evaluation of Potential Indoor-Air Impacts*, Table E-1a, residential land use scenario. Ranges based on high permeability soil (first number presented) and low/moderate permeability soil (second number presented).

As indicated in Table A, the maximum concentrations detected in groundwater during the 1986 investigation are below the ESLs for residential use (the most conservative land use scenario). Therefore, not only would groundwater remediation not be required at the site based on the concentrations detected in 1986, the site would qualify for closure using current closure criteria. RWQCB ESL Table E-1a is included in Attachment C.

No hydrocarbons were detected in soil so it is impossible to compare hydrocarbon concentrations in soil to ESLs. The fact that no hydrocarbons were detected in soil and only low concentrations were detected in groundwater indicates that there was no significant impact to soil from operations prior to cessation of initial operations in 1983.

Justification for De-Designation of Texaco and Calleris Family

According to the SWRCB, Texaco and the Calleris family were named as RP's at the site because they owned the property and the underground storage tanks (USTs), 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 at the 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 an additional release occurred).

Based on the data, it is apparent that the hydrocarbons detected in 1986 would not 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 Calleris 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 Calleris 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 data presented above clearly indicate that, in the absence of the recent oxygenated fuels release(s), the site would not only pass ESLs, but would qualify for case closure because of the lack of sensitive receptors in the site vicinity. The low benzene, toluene and xylenes

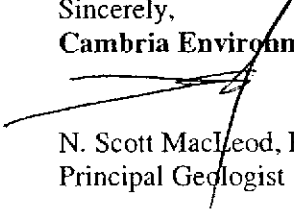
concentrations detected in 1986 do not have a similar effect on beneficial use as the high concentrations of MTBE from the more recent release(s) and do not contribute to the need for cleanup at the site. The MTBE concentrations pose a greater risk to beneficial use because of its greater mobility and lower attenuation rates and any site remediation would be driven by MTBE. In addition, analysis of concentration trends previously prepared by Cambria (Attachment D) indicates that the benzene and toluene concentrations detected in 1986 would now be near or below maximum contaminant levels for drinking water (MCLs) and, therefore, warrant no remediation. Xylenes concentrations were already below MCLs in 1986.



We recommend that ChevronTexaco petition the SWRCB to review the ACHSA's recent decision re-designating ChevronTexaco and the Callaris as secondary RPs at the site. The secondary RP status assigned ChevronTexaco by the ACHSA could have significant current and future liability that is unwarranted given the low concentrations of hydrocarbons detected in the groundwater attributable to pre-1986 site use.

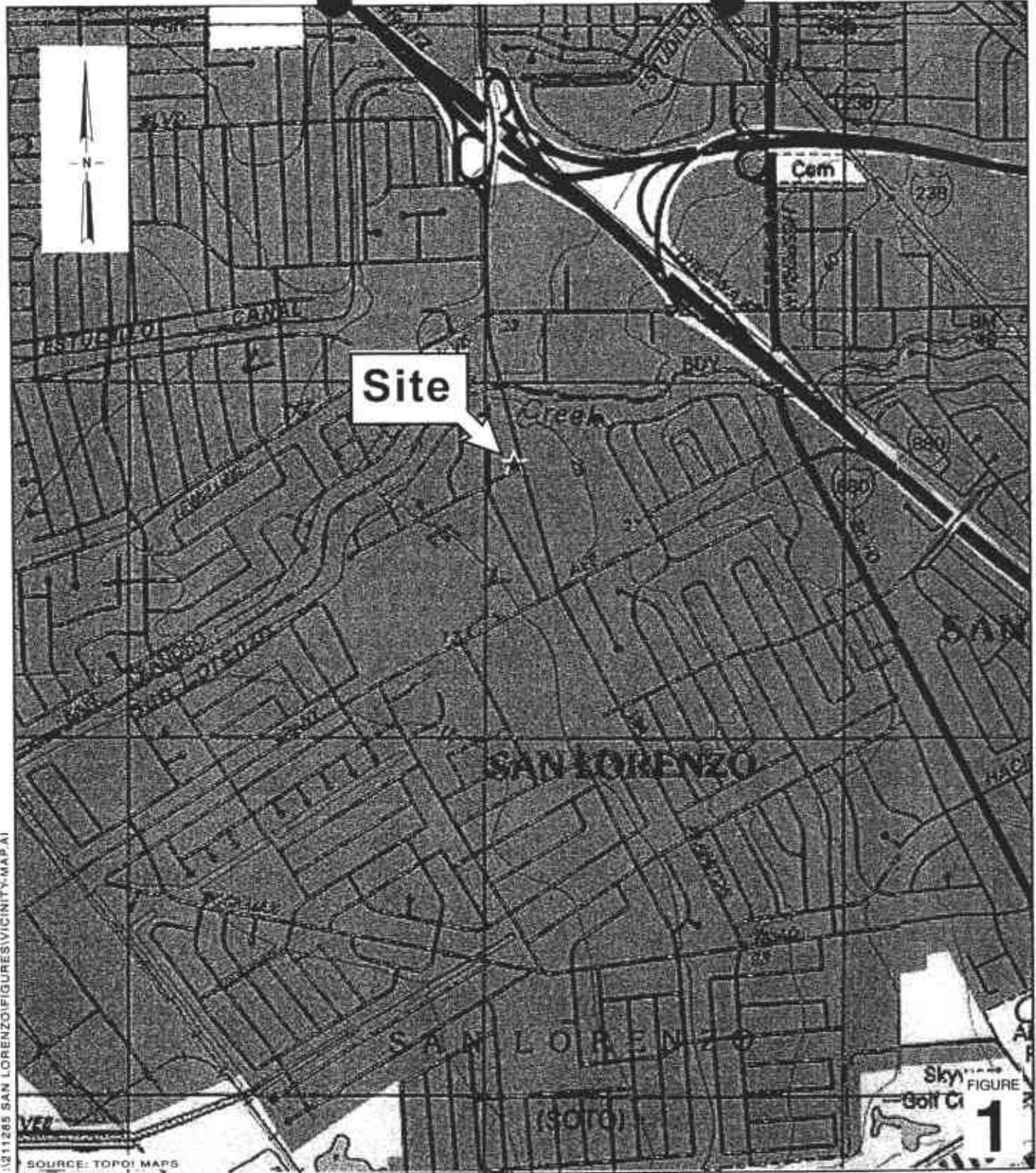
Please contact me at (510) 420-3301 if you have any questions or comments.

Sincerely,
Cambria Environmental Technology, Inc.


N. Scott MacLeod, RG
Principal Geologist

I:\211285 San Lorenzo\Letter Petitioning Re-Designation by ACHSA.doc

Attachments: A - Site Maps
B - Soil and Groundwater Analytical Data
C - ESL Table E-1a
D - Natural Attenuation Analysis



Chevron Service Station 211285

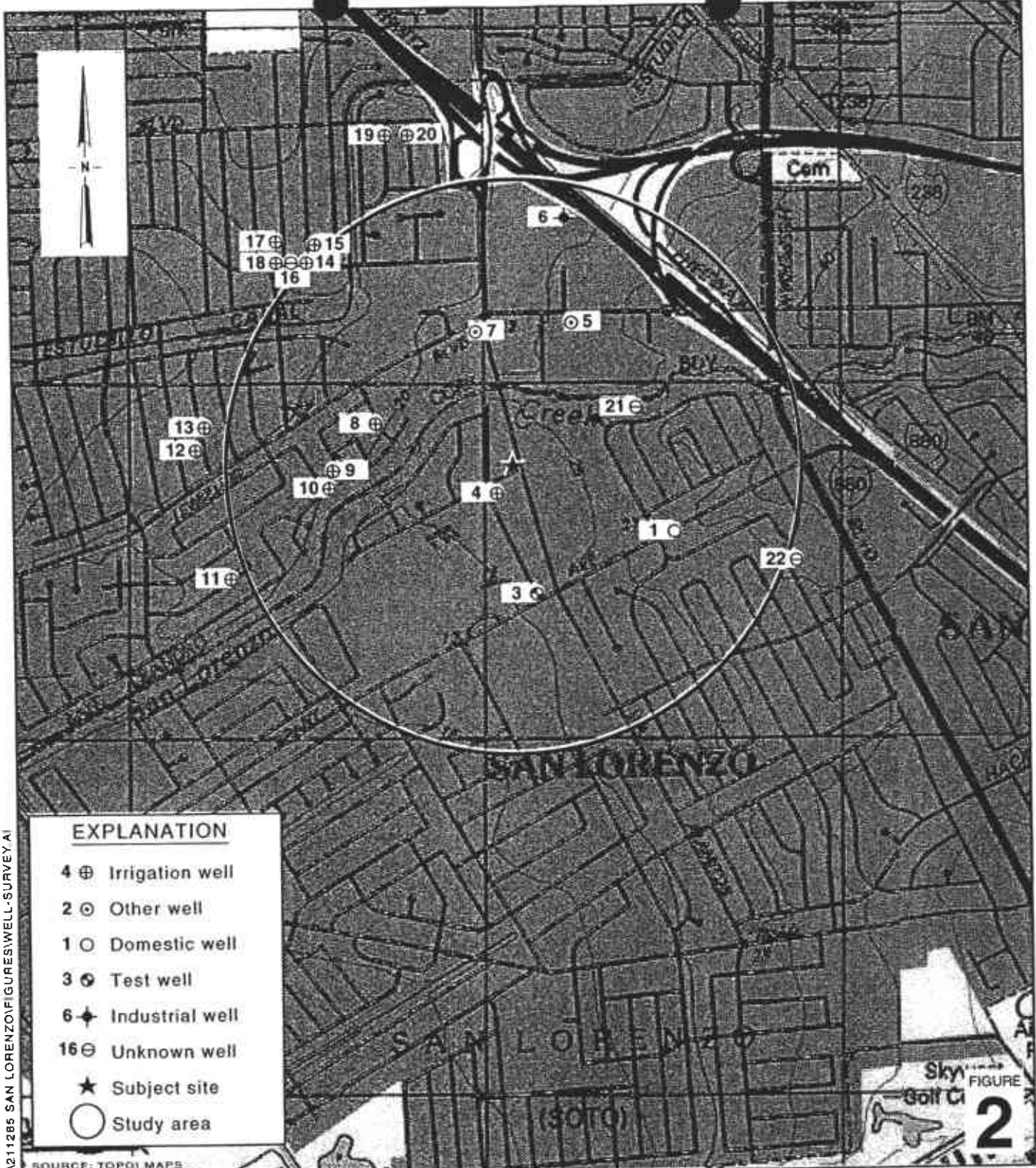
15595 Washington Avenue

San Lorenzo, California



C A M B R I A

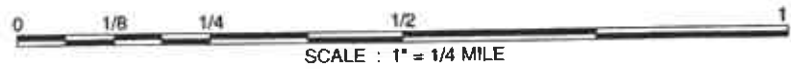
Vicinity Map



EXPLANATION

- 4 ⊕ Irrigation well
- 2 ⊙ Other well
- 1 ○ Domestic well
- 3 ⊛ Test well
- 6 ⊛ Industrial well
- 16 ⊕ Unknown well
- ★ Subject site
- Study area

SOURCE: TOPOI MAPS



Chevron Service Station 211285
 15595 Washington Avenue
 San Lorenzo, California



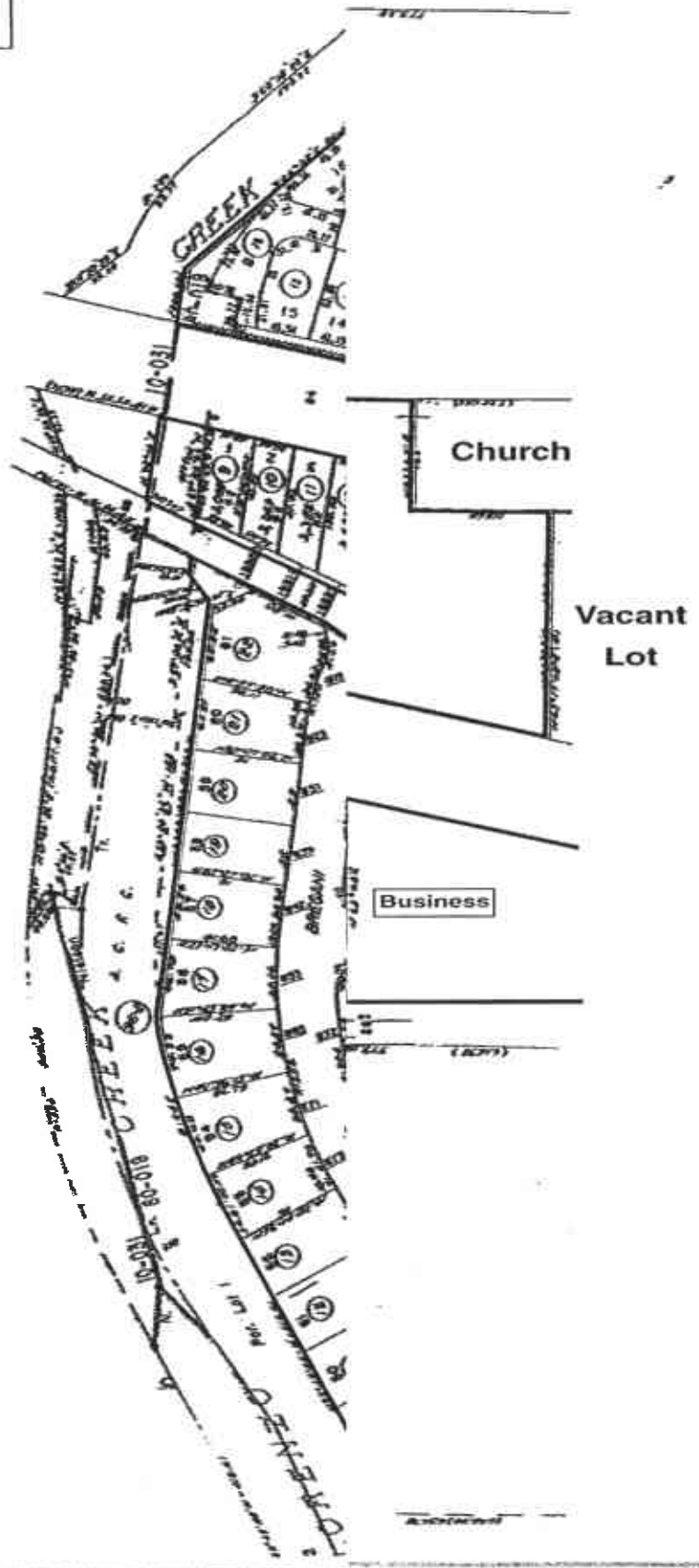
C A M B R I A

Area Well Survey

1/2 Mile Radius

EXPLANATION

- SOG Stab on Grade
- CS Crawl Space



Surrounding Land Use Map



C A M B R I A

FIGURE
3

Chevon Service Station
 15595 Washington Avenue
 San Lorenzo, California

CAMBRIA

TABLE 1: 1/2 MILE RADIUS WELL SURVEY - Former Texaco 211285 - 15595 Washington Avenue, San Lorenzo, CA 95840

Table 1. Location ID#	Township	Range	Section	Well ID	Owner	Depth (fbg)	Screen Interval (fbg)	Address (based on information from DWR-188 forms)	Location	Installation Date	Well Use
1	3S	2W	7	7725	Paul R. Frink	29'	10.5' to 30'	754 Grant Street, San Lorenzo, CA	As stated	Jun-77	Dom
2	3S	3W	12	--	Gus and Francis Parenti	100'	52' to 96'	15785 Washington Avenue, San Lorenzo, CA	As stated	Oct-77	O
3	3S	3W	12	--	Arroyo High School	600'	--	15701 Lorenzo Avenue, San Lorenzo, CA	Along Grant Avenue	1955	Test
4	3S	3W	12	--	Frank Perry	76'	56' to 76'	15600 Lorenzo Avenue, San Lorenzo	As stated	Aug-78	Irr
5	3S	2W	7	--	F. J. Goyette Machine Works	71'	32' to 35'; 52' to 60'; 61' to 71'	624 Lewelling Boulevard, San Lorenzo, CA	As stated	Jul-37	O
6	3S	3W	12	1	San Lorenzo Nursery	524'	341' to 354'; 490' to 511'	10500 Washington Avenue, San Lorenzo, CA	As stated	Jun-57	Ind
7	3S	3W	12	--	San Lorenzo Nursery	720'	--	10500 Washington Avenue, San Lorenzo, CA	On Washington Avenue	Oct-47	O
8	3S	3W	12	--	Dewey Roole	30'	15' to 30'	15547 Sedgeman Street, San Lorenzo, CA	As stated	--	Irr
9	3S	3W	12	--	Robert Perino	30'	13' to 30'	15596 Tilden Street, San Leandro, CA	As stated	Mar-77	Irr
10	3S	3W	12	--	Aubrey Elliot	30'	15' to 30'	1018 Kramer Street, San Leandro, CA	As stated	Apr-77	Irr
11	3S	3W	12	577	George and Loretta Bolla	27'	13' to 27'	1335 Sayre Street, San Leandro, CA	As stated	Jun-77	Irr
12	3S	3W	12	--	Ronald Stanley	30'	10' to 30'	15368 Churchill Street, San Leandro, CA	As stated	May-77	Irr
13	3S	3W	12	--	Donald Woolery	22.5'	--	15340 Churchill Street, San Leandro, CA	As stated	Mar-77	Irr
14	3S	3W	12	--	Christ Presbyterian Church	28'	10' to 28'	890 Fargo Avenue, San Leandro, CA	As stated	Jul-77	Irr
15	3S	3W	12	77377	Jan Tisby	20'	10' to 20'	15193 Endicott, San Leandro, CA	As stated	Aug-77	Irr
16	3S	3W	12	--	Richard D. Armstrong	40'	15' to 40'	15177 Norton Street, San Leandro, CA	As stated	Aug-77	--
17	3S	3W	12	77306	Sal Campilongo	30'	10' to 30'	15190 Norton Street, San Leandro, CA	As stated	May-76	Irr
18	3S	3W	12	--	Herman C. Albright	46'	21' to 46'	15185 Norton Street, San Leandro, CA	As stated	Apr-77	Irr
19	3S	3W	12	--	Roy Swatman	28'	10' to 28'	15054 Alexandria Street, San Leandro, CA	As stated	May-77	Irr
20	3S	3W	12	--	Lyle S. Bates	28'	22' to 28'	15028 Grenda Street, San Leandro, CA	As stated	May-77	Irr
21	3S	3W	12	--	A. L. Christensen	358'	275' to 279'; 318' to 323'; 326' to 330'; 348' to 358'	--	--	Mar-40	--
22	3S	2W	11	--	Ratti	124'	57' to 59'; 104' to 112'; 119' to 124'	--	--	Aug-45	--

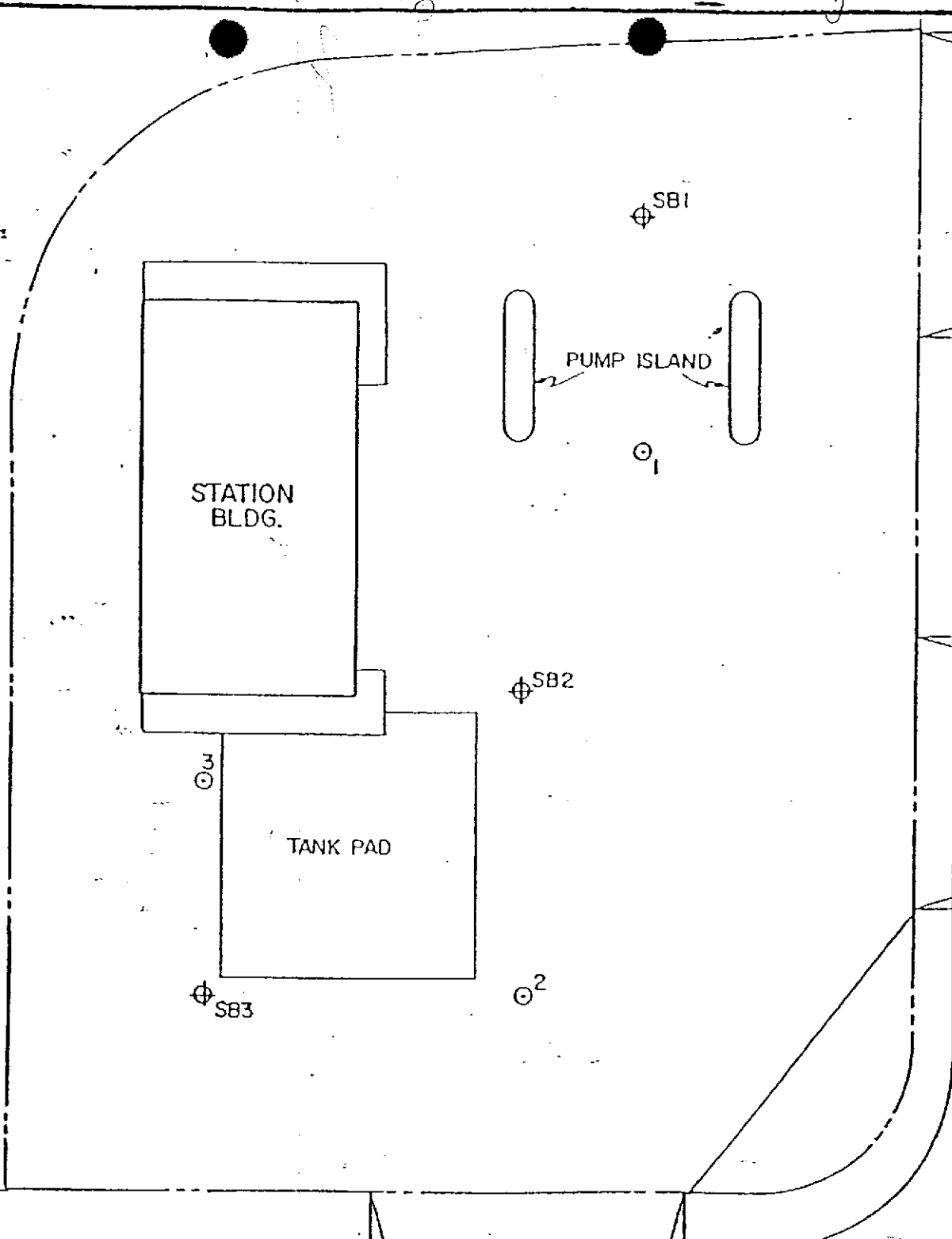
M = Municipal, Dom = Domestic, P = Public, Irr = Irrigation, Ind = Industrial, O = Other, Test = Test Well
 -- = no data available
 ? = unknown
 fbg = feet below grade

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ATTACHMENT A

Site Maps



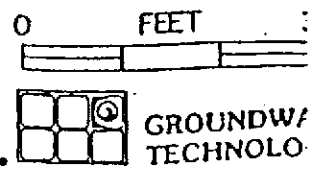
LEGEND

- ⊙ MONITORING WELL
- ⊕ SOIL BORING

VIA ENRICO ST.

WASHINGTON ST.

**FIGURE 2
SITE PLAN**



TEXACO USA
SAN LORENZO, CALIFORNIA

C A M B R I A



ATTACHMENT B

Soil and Groundwater Analytical Data

BROWN AND CALDWELL



ANALYTICAL LABORATORIES

RECEIVED

Aug 2 1986

LOG NO: E86-08-202

Received: 11 AUG 86

Reported: 28 AUG 86

Ms. Amy Sager
Groundwater Technology
4080 Pike Lane, Suite D
Concord, California 94520

Purchase Order: 464

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION , SOIL SAMPLES	DATE SAMPLED
08-202-1	MW-1 Composite	08 AUG 86
08-202-2	MW-2 Composite	08 AUG 86
08-202-3	MW-3 Composite	08 AUG 86
08-202-4	SB-1 Composite	08 AUG 86
08-202-5	SB-2 Composite	08 AUG 86

PARAMETER	08-202-1	08-202-2	08-202-3	08-202-4	08-202-5
Lead, mg/kg	12	12	18	14	20
Nitric Acid Digestion, Date	08.18.86	08.18.86	08.18.86	08.18.86	08.18.86
Benzene, Toluene, Xylene Isomers					
Benzene, mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5
Toluene, mg/kg	<0.5	<0.5	<0.5	<0.5	<0.5
Total Xylene Isomers, mg/kg	<1.0	<1.0	<1.0	<1.0	<1.0
Total Fuel Hydrocarbons, mg/kg	<10	<10	<10	<10	<10



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 Groundwater Technology
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 Concord, California 94520

Purchase Order: 464

REPORT OF ANALYTICAL RESULTS

LOG NO	SAMPLE DESCRIPTION , SOIL SAMPLES	DATE SAMPLED
08-202-6	SB-3 Composite	08 AUG 86
PARAMETER		08-202-6
Lead, mg/kg		12
Nitric Acid Digestion, Date		08.18.86
Benzene, Toluene, Xylene Isomers		
Benzene, mg/kg		<0.5
Toluene, mg/kg		<0.5
Total Xylene Isomers, mg/kg		<1.0
Total Fuel Hydrocarbons, mg/kg		<10



LOG NO: E86-08-202

Received: 11 AUG 86

Reported: 28 AUG 86

Ms. Amy Sager
 Groundwater Technology
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REPORT OF ANALYTICAL RESULTS

Page 3

LOG NO	SAMPLE DESCRIPTION , GROUND WATER SAMPLES	DATE SAMPLED				
08-202-7	MW-1	08 AUG 86				
08-202-8	MW-2	08 AUG 86				
08-202-9	MW-3	08 AUG 86				
08-202-10	SB-1	08 AUG 86				
08-202-11	SB-2	08 AUG 86				
PARAMETER		08-202-7	08-202-8	08-202-9	08-202-10	08-202-11
Benzene, Toluene, Xylene Isomers						
Benzene, mg/L		<0.05	<0.05	<0.05	0.22	<0.05
Toluenē, mg/L		<0.05	<0.05	<0.05	0.39	<0.05
Total Xylene Isomers, mg/L		0.082	<0.05	<0.05	0.68	<0.05



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Ms. Amy Sager
Groundwater Technology
4080 Pike Lane, Suite D
Concord, California 94520

Purchase Order: 464

REPORT OF ANALYTICAL RESULTS

Page 4

LOG NO	SAMPLE DESCRIPTION , GROUND WATER SAMPLES	DATE SAMPLED
08-202-12	SB-3	08 AUG 86
PARAMETER		08-202-12
Benzene, Toluene, Xylene Isomers		
Benzene, mg/L		<0.05
Toluene, mg/L		<0.05
Total Xylene Isomers, mg/L		<0.05

Linda Black Fox
D. A. McLean, Laboratory Director

C A M B R I A



ATTACHMENT C

ESL Table E-1a

**TABLE E-1a. GROUNDWATER SCREENING LEVELS
FOR EVALUATION OF POTENTIAL INDOOR-AIR IMPACTS
(volatile chemicals only)**

CHEMICAL PARAMETER	Physical State		Residential Land Use		Commercial/Industrial Land Use	
			Vadose-Zone Soil Type		Vadose-Zone Soil Type	
			*High Permeability (ug/L)	*Low/Moderate Permeability (ug/L)	*High Permeability (ug/L)	*Low/Moderate Permeability (ug/L)
#ACENAPHTHENE	V	S	4.2E+03	4.2E+03	4.2E+03	4.2E+03
ACENAPHTHYLENE	V	S	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
#ACETONE	V	L	6.0E+06	7.9E+06	1.6E+07	2.2E+07
ALDRIN	NV	S				
#ANTHRACENE	V	S	4.3E+01	4.3E+01	4.3E+01	4.3E+01
ANTIMONY	NV	S				
ARSENIC	NV	S				
BARIUM	NV	S				
#BENZENE	V	L	5.3E+02	1.9E+03	1.8E+03	6.4E+03
BENZO(a)ANTHRACENE	NV	S				
BENZO(b)FLUORANTHENE	NV	S				
BENZO(k)FLUORANTHENE	NV	S				
BENZO(g,h,i)PERYLENE	NV	S				
BENZO(a)PYRENE	NV	S				
BERYLLIUM	NV	S				
BIPHENYL, 1,1-	V	S	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
BIS(2-CHLOROETHYL)ETHER	V	L	8.3E+01	8.3E+01	2.1E+02	2.8E+02
BIS(2-CHLOROISOPROPYL)ETHER	V	L	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
BIS(2-ETHYLHEXYL)PHTHALATE	NV	S				
BORON	NV	S				
BROMODICHLOROMETHANE	V	L	1.6E+02	3.1E+02	5.4E+02	1.0E+03
BROMOFORM	NV	S				
BROMOMETHANE	V	G	5.8E+02	2.0E+03	1.6E+03	5.7E+03
CADMIUM	NV	S				
CARBON TETRACHLORIDE	V	L	9.5E+00	4.0E+01	3.2E+01	1.4E+02
CHLORDANE	NV	S				
CHLOROANILINE, p-	NV	S				
CHLOROBENZENE	V	L	1.3E+04	4.3E+04	3.8E+04	1.2E+05
CHLOROETHANE	V	G	8.2E+02	3.3E+03	2.7E+03	1.1E+04
CHLOROFORM	V	L	3.4E+02	1.2E+03	1.1E+03	3.9E+03
CHLOROMETHANE	V	G	1.7E+02	7.5E+02	5.8E+02	2.5E+03
CHLOROPHENOL, 2-	V	L	5.5E+03	1.6E+04	1.5E+04	4.6E+04
CHROMIUM (Total)	NV	S				
CHROMIUM III	NV	S				
CHROMIUM VI	NV	S				
CHRYSENE	NV	S				
COBALT	NV	S				
COPPER	NV	S				

**TABLE E-1a. GROUNDWATER SCREENING LEVELS
FOR EVALUATION OF POTENTIAL INDOOR-AIR IMPACTS
(volatile chemicals only)**

CHEMICAL PARAMETER	Physical State		Residential Land Use		Commercial/Industrial Land Use	
			Vadose-Zone Soil Type		Vadose-Zone Soil Type	
			¹ High Permeability (ug/L)	² Low/Moderate Permeability (ug/L)	¹ High Permeability (ug/L)	² Low/Moderate Permeability (ug/L)
CYANIDE (Free)	NV	S				
DIBENZO(a,h)ANTHTRACENE	NV	S				
DIBROMOCHLOROMETHANE	V	S	1.8E+02	4.2E+02	6.1E+02	1.4E+03
1,2-DIBROMO-3-CHLOROPROPANE	V	L	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
DIBROMOETHANE, 1,2-	V	S	1.6E+02	2.6E+02	5.6E+02	8.6E+02
DICHLOROBENZENE, 1,2-	V	L	7.8E+04	1.6E+05	1.6E+05	1.6E+05
DICHLOROBENZENE, 1,3-	V	L	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
DICHLOROBENZENE, 1,4-	V	S	3.6E+02	1.0E+03	1.2E+03	3.4E+03
DICHLOROBENZIDINE, 3,3-	NV	S				
DICHLORODIPHENYLDICHLOROETHANE (DDO)	NV	S				
DICHLORODIPHENYLDICHLOROETHYLENE (DDE)	NV	S				
DICHLORODIPHENYLTRICHLOROETHANE (DDT)	NV	S				
DICHLOROETHANE, 1,1-	V	L	1.0E+03	3.6E+03	3.5E+03	1.2E+04
DICHLOROETHANE, 1,2-	V	L	2.0E+02	5.1E+02	6.9E+02	1.7E+03
DICHLOROETHYLENE, 1,1-	V	L	6.3E+03	2.7E+04	1.8E+04	7.5E+04
DICHLOROETHYLENE, Cis 1,2-	V	L	6.2E+03	2.0E+04	1.7E+04	5.5E+04
DICHLOROETHYLENE, Trans 1,2-	V	L	6.7E+03	2.5E+04	1.9E+04	6.9E+04
DICHLOROPHENOL, 2,4-	NV	S				
DICHLOROPROPANE, 1,2-	V	L	2.9E+02	8.9E+02	9.6E+02	3.0E+03
DICHLOROPROPENE, 1,3-	V	L	4.9E+01	2.0E+02	1.7E+02	6.6E+02
DIELDRIN	NV	S				
DIETHYLPHTHALATE	NV	S				
DIMETHYLPHTHALATE	NV	S				
#DIMETHYLPHENOL, 2,4-	V	S	2.8E+06	4.1E+06	8.0E+06	1.1E+07
DINITROPHENOL, 2,4-	NV	S				
DINITROTOLUENE, 2,4-	NV	S				
1,4 DIOXANE	NV	L				
DIOXIN (2,3,7,8-TCDD)	NV	S				
ENDOSULFAN	NV	S				
ENDRIN	NV	S				
#ETHYLBENZENE	V	L	1.4E+04	5.2E+04	4.7E+04	1.8E+05
FLUORANTHENE	NV	S				
#FLUORENE	V	S	1.9E+03	1.9E+03	1.9E+03	1.9E+03
HEPTACHLOR	NV	S				
HEPTACHLOR EPOXIDE	NV	S				
HEXACHLOROBENZENE	NV	S				
HEXACHLOROBUTADIENE	NV	S				
HEXACHLOROCYCLOHEXANE (gamma) LINDANE	NV	S				

**TABLE E-1a. GROUNDWATER SCREENING LEVELS
FOR EVALUATION OF POTENTIAL INDOOR-AIR IMPACTS
(volatile chemicals only)**

CHEMICAL PARAMETER	Physical State	Residential Land Use		Commercial/Industrial Land Use	
		Vadose-Zone Soil Type		Vadose-Zone Soil Type	
		*High Permeability (ug/L)	*Low/Moderate Permeability (ug/L)	*High Permeability (ug/L)	*Low/Moderate Permeability (ug/L)
HEXACHLOROETHANE	NV S				
INDENO(1,2,3-cd)PYRENE	NV S				
LEAD	NV S				
MERCURY	NV S				
METHOXYCHLOR	NV S				
METHYLENE CHLORIDE	V L	2.4E+03	7.2E+03	8.1E+03	2.4E+04
#METHYL ETHYL KETONE	V L	5.5E+07	1.2E+08	1.5E+08	3.3E+08
#METHYL ISOBUTYL KETONE	V L	3.1E+06	4.3E+06	8.7E+06	1.2E+07
METHYL MERCURY	NV S				
#METHYLNAPHTHALENE (total 1- & 2-)	V S	2.6E+04	2.6E+04	2.6E+04	2.6E+04
METHYL TERT BUTYL ETHER	V L	2.4E+04	4.8E+04	8.0E+04	1.6E+05
MOLYBDENUM	NV S				
#NAPHTHALENE	V S	2.8E+04	3.1E+04	3.1E+04	3.1E+04
NICKEL	NV S				
PENTACHLOROPHENOL	NV S				
PERCHLORATE	NV S				
PHENANTHRENE	V S	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
PHENOL	NV S				
POLYCHLORINATED BIIPHENYLS (PCBs)	NV S				
#PYRENE	V S	1.4E+02	1.4E+02	1.4E+02	1.4E+02
SELENIUM	NV S				
SILVER	NV S				
#STYRENE	V L	3.1E+05	3.1E+05	3.1E+05	3.1E+05
tert-BUTYL ALCOHOL		(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
TETRACHLOROETHANE, 1,1,1,2-	V L	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
TETRACHLOROETHANE, 1,1,2,2-	V L	1.9E+02	3.1E+02	6.3E+02	1.0E+03
TETRACHLOROETHYLENE	V L	1.3E+02	5.2E+02	4.3E+02	1.7E+03
THALLIUM	NV S				
#TOLUENE	V L	5.0E+05	5.3E+05	5.3E+05	5.3E+05
TOXAPHENE	NV S				
TPH (gasolines)	V L	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
TPH (middle distillates)	V L	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)	(NV: Use soil gas)
TPH (residual fuels)	NV US				
TRICHLOROBENZENE, 1,2,4-	V L	1.5E+05	2.6E+05	3.0E+05	3.0E+05
TRICHLOROETHANE, 1,1,1-	V L	1.3E+05	5.2E+05	3.6E+05	1.3E+06
TRICHLOROETHANE, 1,1,2-	V L	3.5E+02	8.0E+02	1.2E+03	2.7E+03
TRICHLOROETHYLENE	V L	5.3E+02	2.1E+03	1.8E+03	8.9E+03
TRICHLOROPHENOL, 2,4,5-	V S	8.2E+05	8.2E+05	1.2E+06	1.2E+06

**TABLE E-1a. GROUNDWATER SCREENING LEVELS
FOR EVALUATION OF POTENTIAL INDOOR-AIR IMPACTS
(volatile chemicals only)**

CHEMICAL PARAMETER	Physical State		Residential Land Use		Commercial/Industrial Land Use	
			Vadose-Zone Soil Type		Vadose-Zone Soil Type	
			*High Permeability (ug/L)	*Low/Moderate Permeability (ug/L)	*High Permeability (ug/L)	*Low/Moderate Permeability (ug/L)
TRICHLOROPHENOL, 2,4,6-	NV	S				
VANADIUM	NV	S				
VINYL CHLORIDE	V	G	4.0E+00	1.7E+01	1.3E+01	5.7E+01
XYLENES	V	L	1.5E+05	1.6E+05	1.6E+05	1.6E+05
ZINC	NV	S				

Notes:

- "Residential" screening levels generally considered adequate for other sensitive uses (e.g., day-care centers, hospitals, etc.).
- High permeability soil model: One meter dry sandy soil (92% sand, 5% silt, 3% clay) over one meter moist clayey loam (33% sand, 34% silt, 33% clay).
- Low/Moderate permeability soil model: One meter dry loamy sand (83% sand, 11% silt, 6% clay) over one meter moist silt (7% sand, 87% silt, 6% clay).
- For inclusion in Tier 1 screening levels, all groundwater assumed to potentially migrate under a residential area. Screening levels for protection of indoor air under a residential exposure scenario carried forward for use at both residential and commercial/industrial sites (see Table F series).

Screening levels calculated using spreadsheet provided with *User's Guide for the Johnson and Ettinger Indoor Air model (1991) for Subsurface Vapor Intrusion into Buildings* (USEPA 2001). Assumed vadose-zone thickness/depth to groundwater three meters. See Appendix 1 text for model details. Physical state of chemical at ambient conditions (V - volatile, NV - nonvolatile, S - solid, L - liquid, G - gas). Chemical considered to be "volatile" if Henry's number (atm m³/mole) >0.00001 and molecular weight <200. Dibromochloromethane, dibromochloropropane and pyrene considered volatile for purposes of modeling (USEPA 2002). Target cancer risk = 1E-06, Target Hazard Quotient = 0.2
 *H: Nonchlorinated VOCs (except MTBE) adjusted upwards by factor of ten to account for assumed biodegradation in vadose-zone prior to emission at surface.
 NV: No value. Use soil gas data to evaluate potential indoor-air impact concerns.

C A M B R I A



ATTACHMENT D

Natural Attenuation Analysis

Concentration Data for Well MW-1, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

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

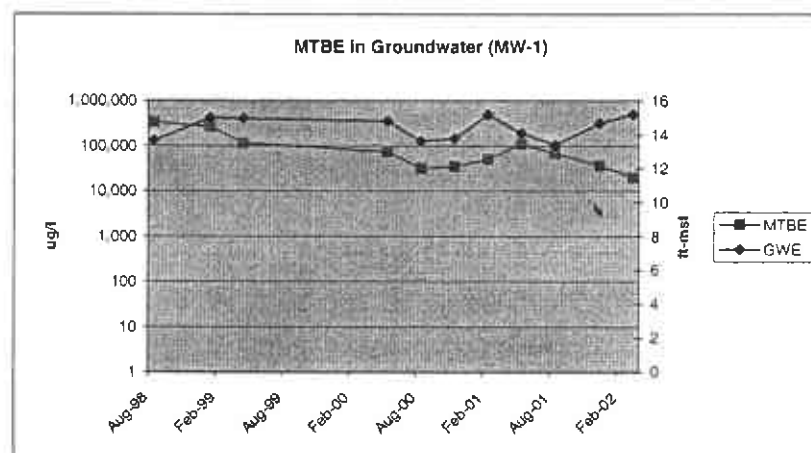
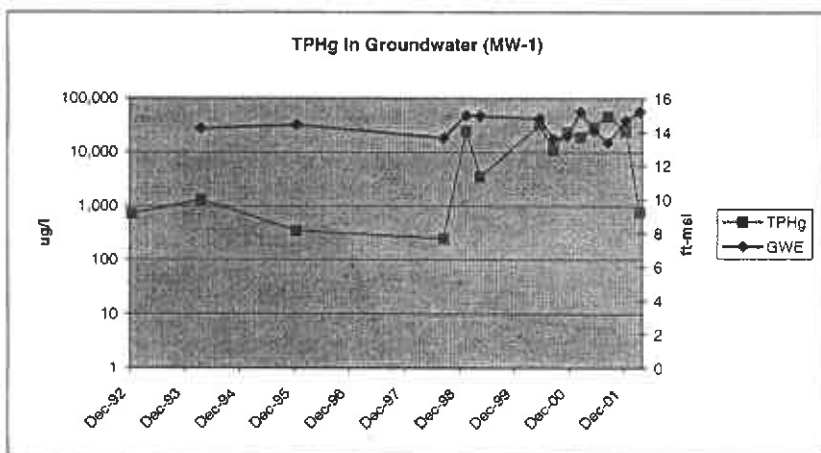
Edited Data

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

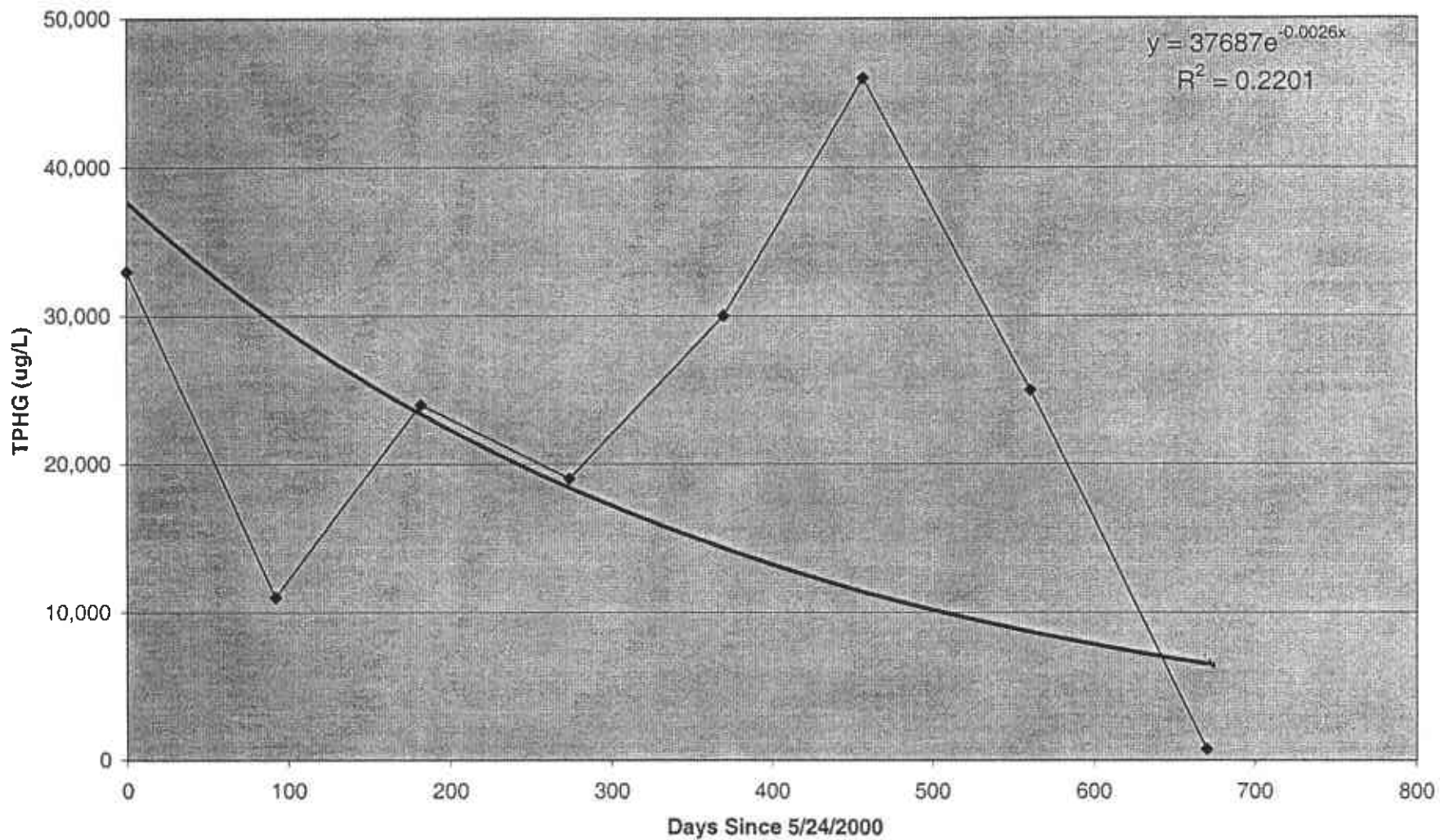
Days Since 5/24/2000	TPH-G (ug/L)
0	33,000
92	11,000
182	24,000
274	19,000
370	30,000
457	46,000
561	25,000
670	770

Days Since 8/26/1998	MTBE (ug/L)
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 TPHg 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: TPHg

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

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

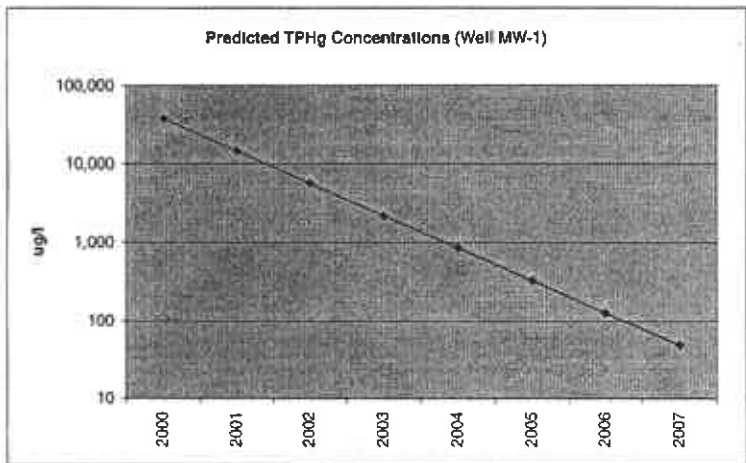
Given

Water Quality Objective:	y	50 ug/L
Constant:	b	37687
Constant:	a	-0.0026
Date of first sample:		5/24/2000

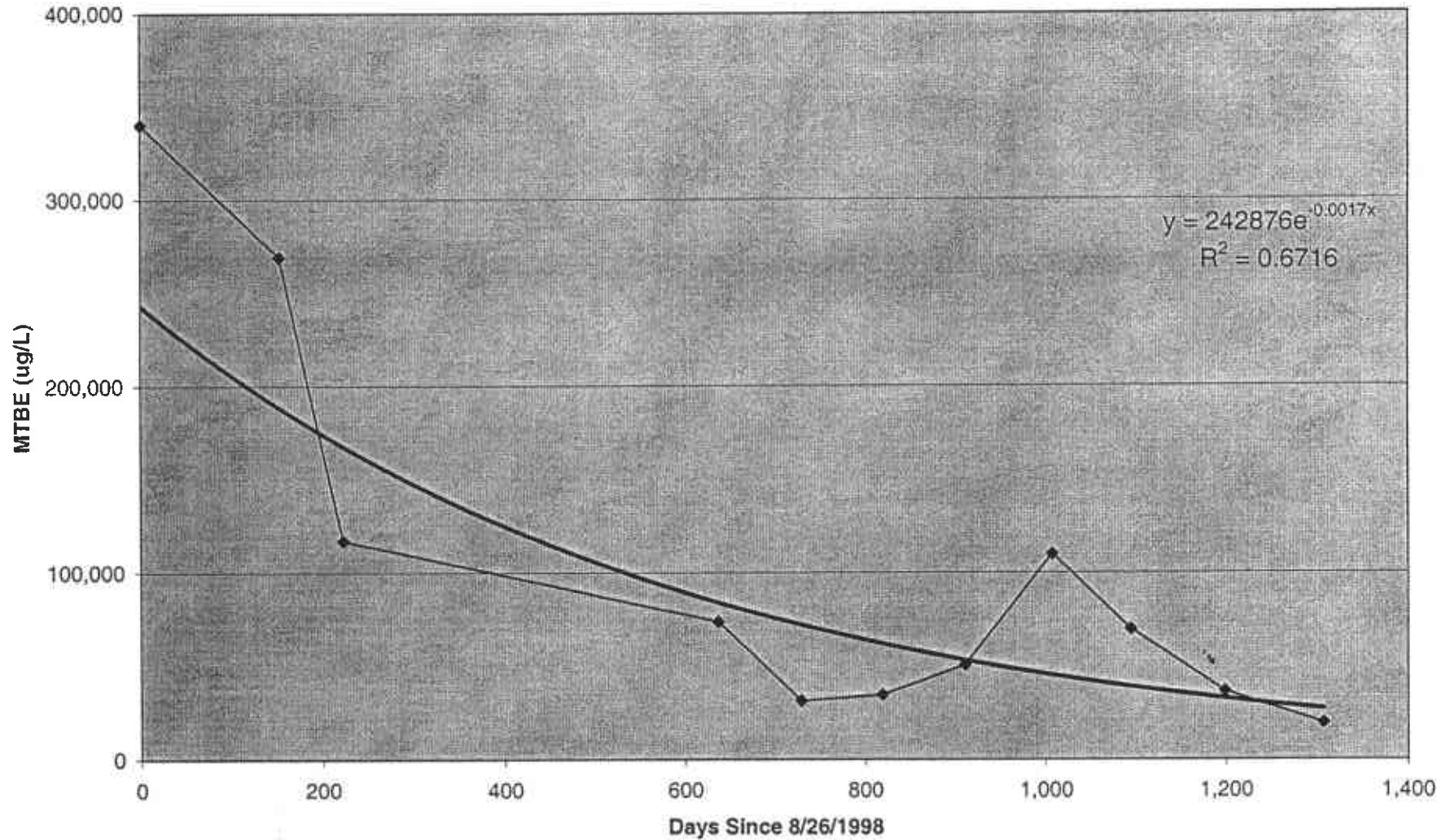
Calculate

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

Calculated Half Life = $-\ln(2)/a$
 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	5 ug/L
Constant:	b	242876
Constant:	a	-0.0017
Date of first sample:		8/26/1998

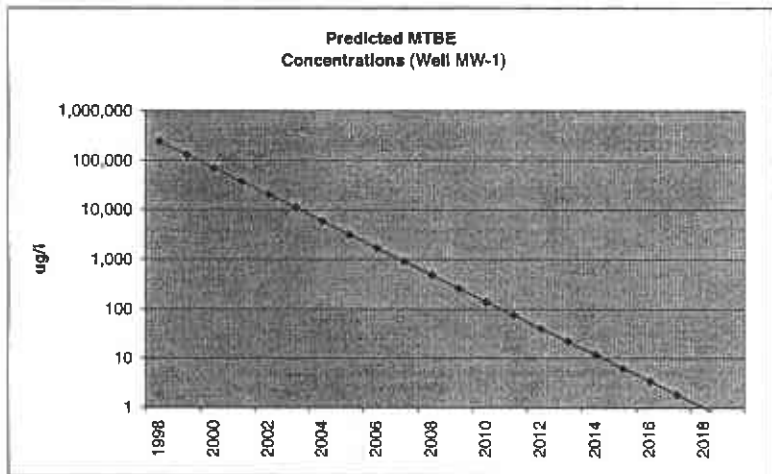
Calculate

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

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



Concentration Data for Well MW-2, Former Texaco Site 211285, 15595 Washington Street, San Lorenzo, California

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

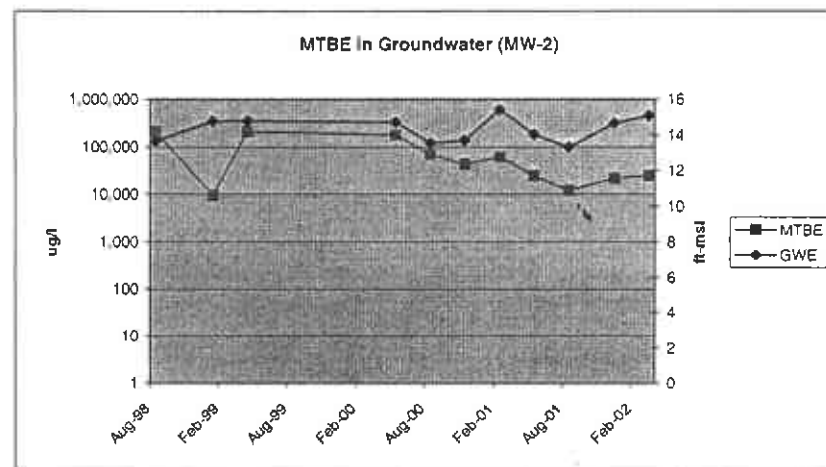
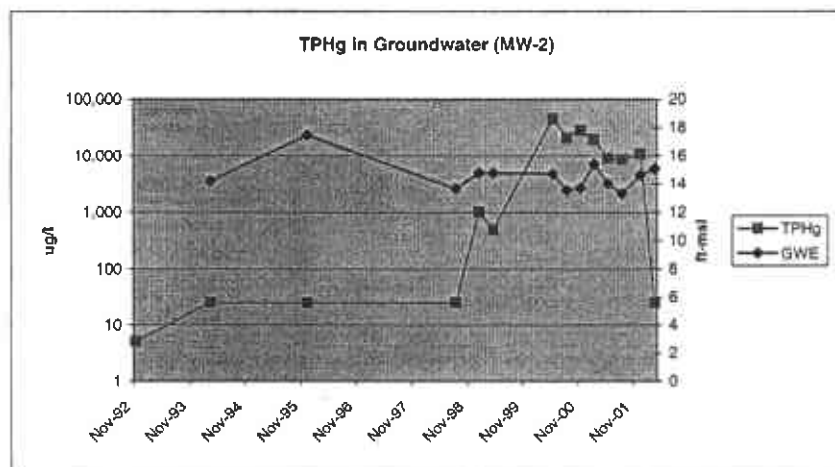
Days Since 5/24/2000	TPH-G (ug/L)
0	46,000
92	21,000
182	29,000
274	20,000
370	9,100
457	8,700
561	11,000
670	25

Days Since
4/6/1999

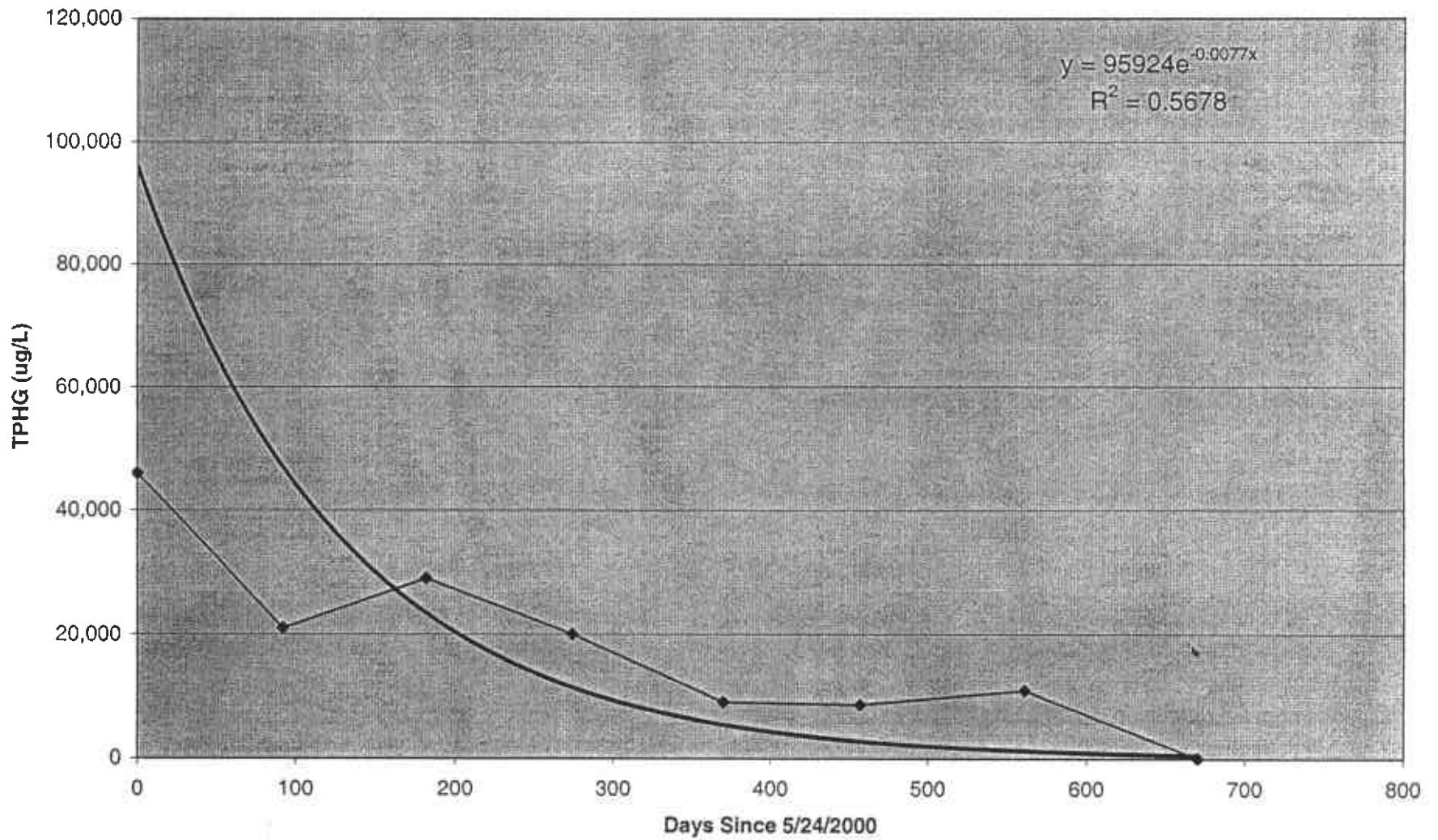
Days Since 4/6/1999	MTBE (ug/L)
0	209,000
414	200,000
506	170,000
596	160,000
688	130,000
784	78,000
871	98,000
975	94,000
1,084	62,000

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:

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

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

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

Given

Water Quality Objective:	y	50 ug/L
Constant:	b	95924
Constant:	a	-0.0077
Date of first sample:		5/24/2000

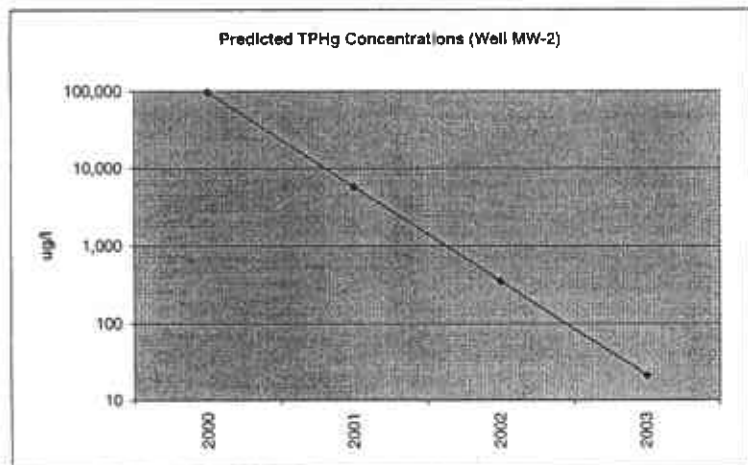
Calculate

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

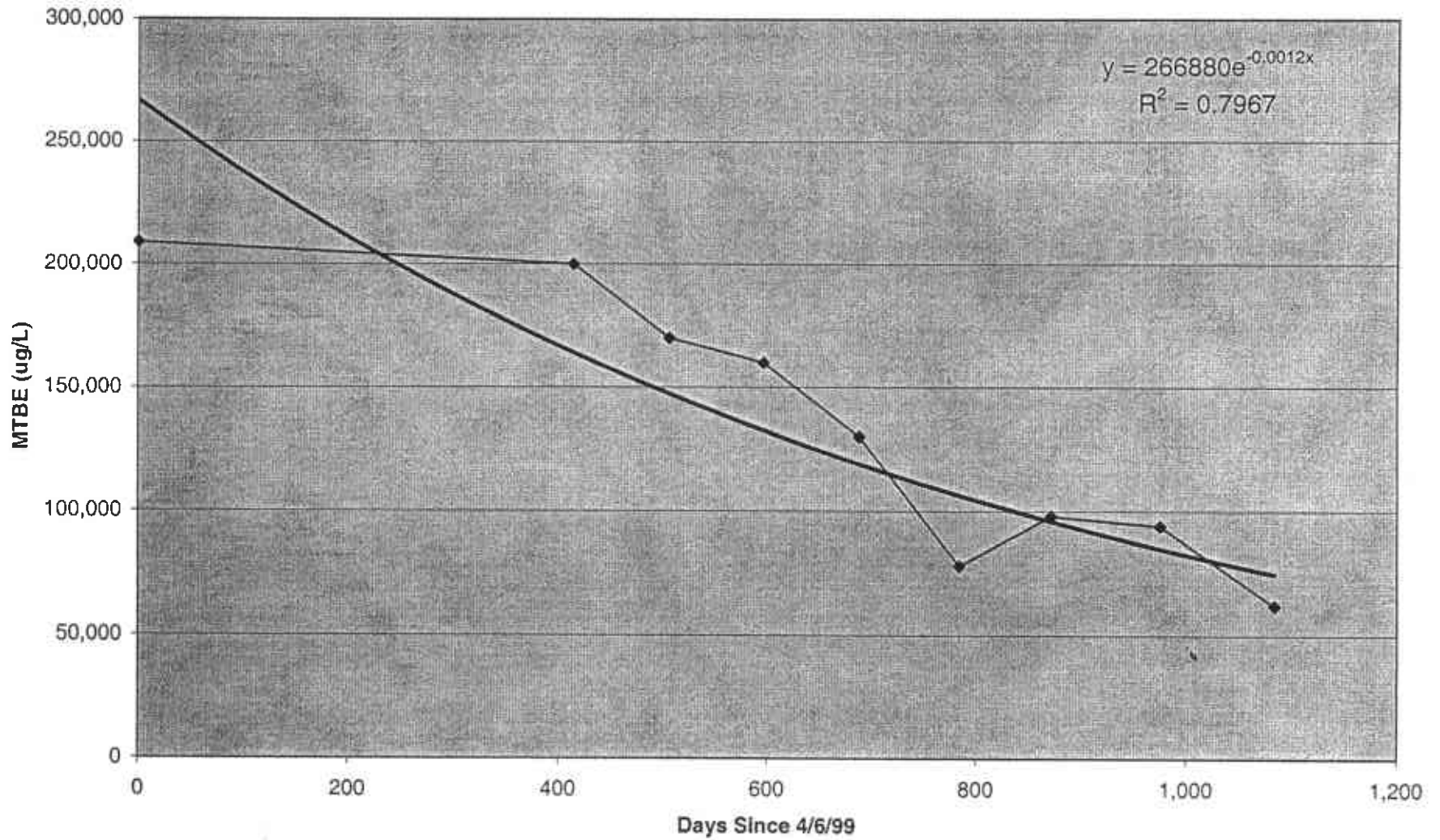
Calculated Half Life = $-\ln(2)/a$ = 90 Days

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



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

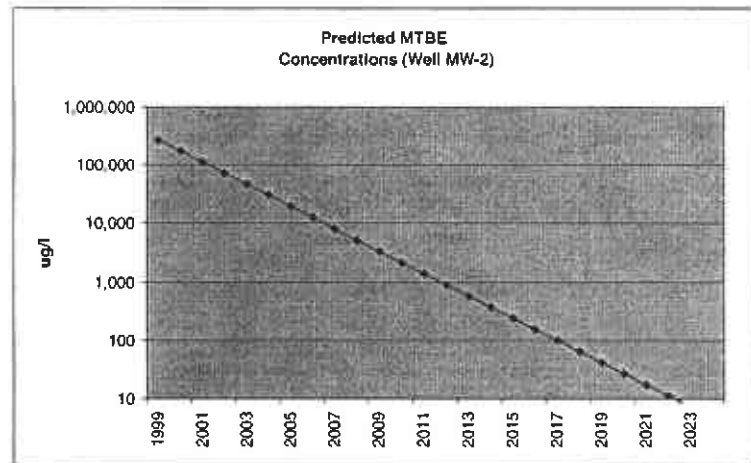
Calculate

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



Concentration Data for Well MW-3, Former Texaco Site 21 1285, 15595 Washington Street, San Lorenzo, California

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

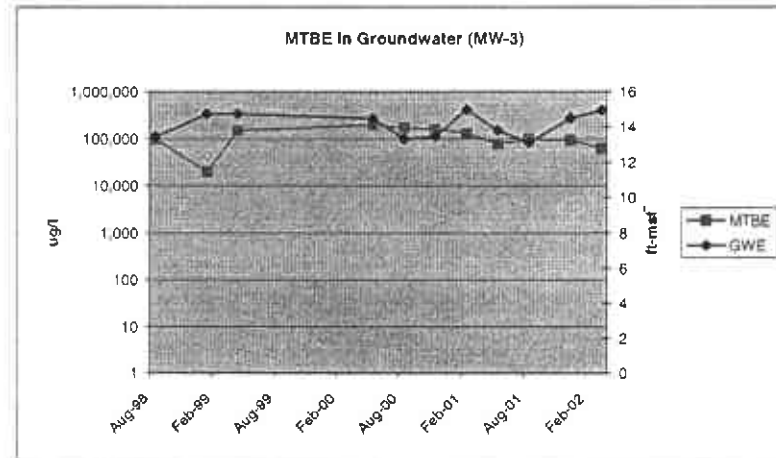
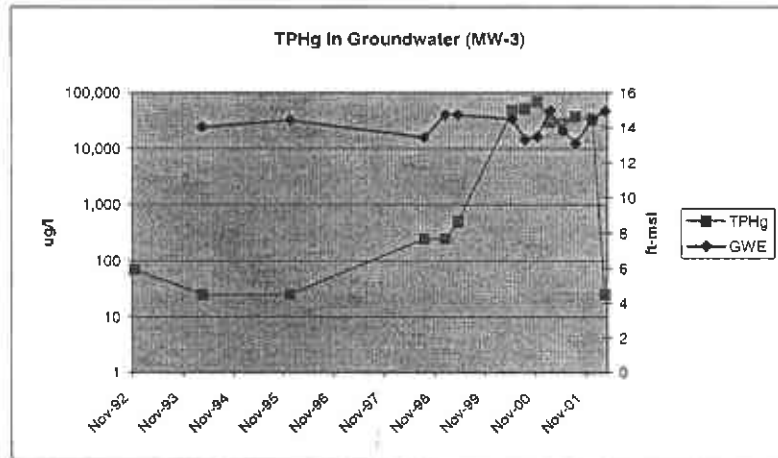
Days Since
11/22/2000
TPH-G
(ug/L)

0	69,000
92	30,000
188	29,000
275	37,000
379	33,000
488	25

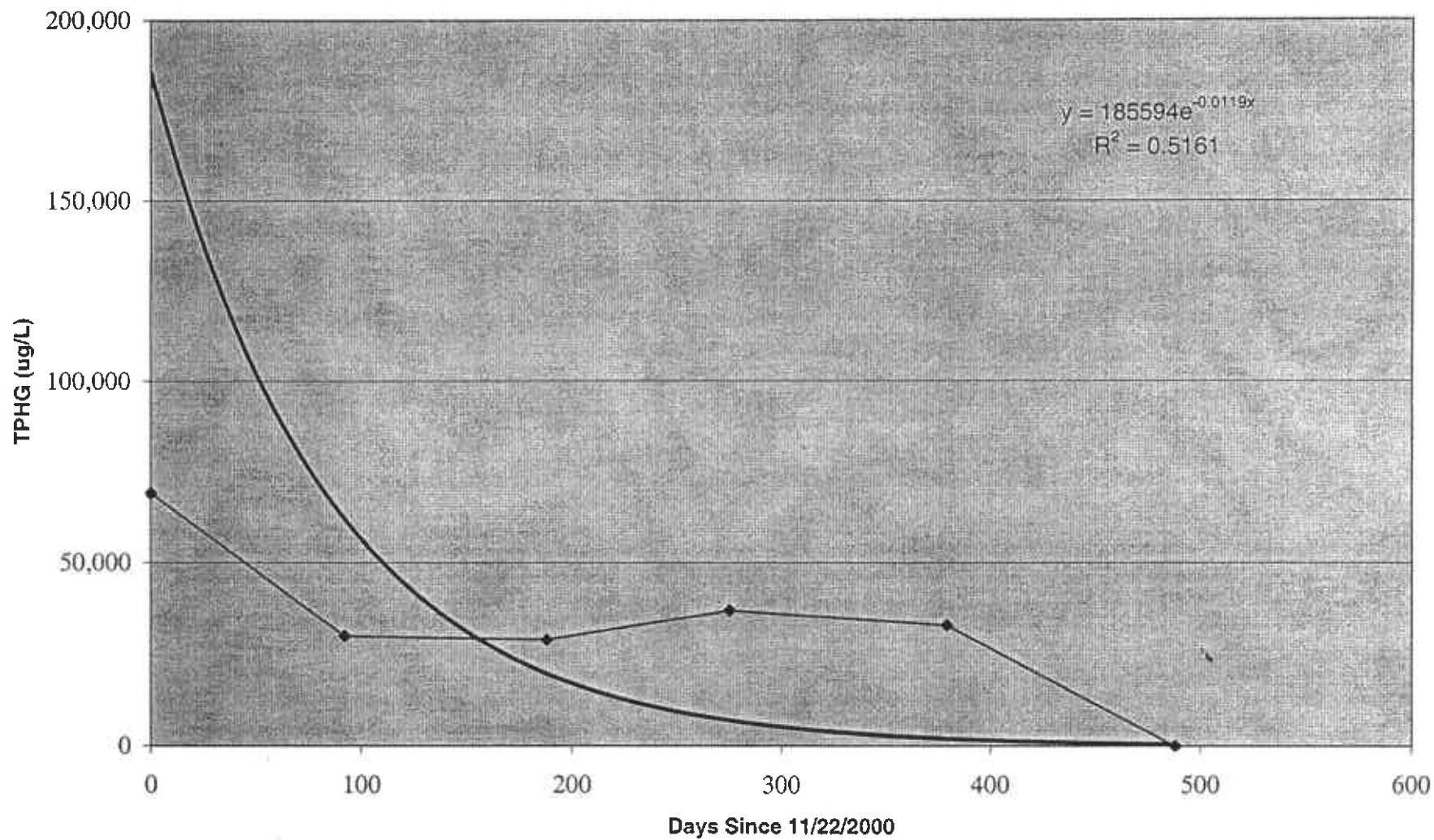
Days Since
5/24/2000
MTBE
(ug/L)

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

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

Given

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

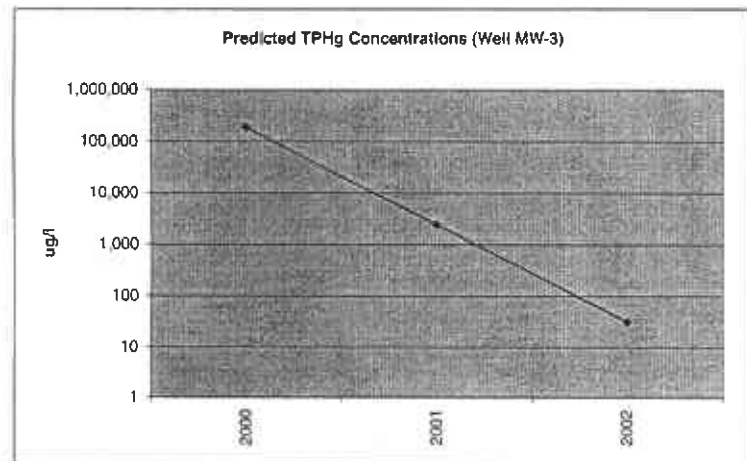
Calculate

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

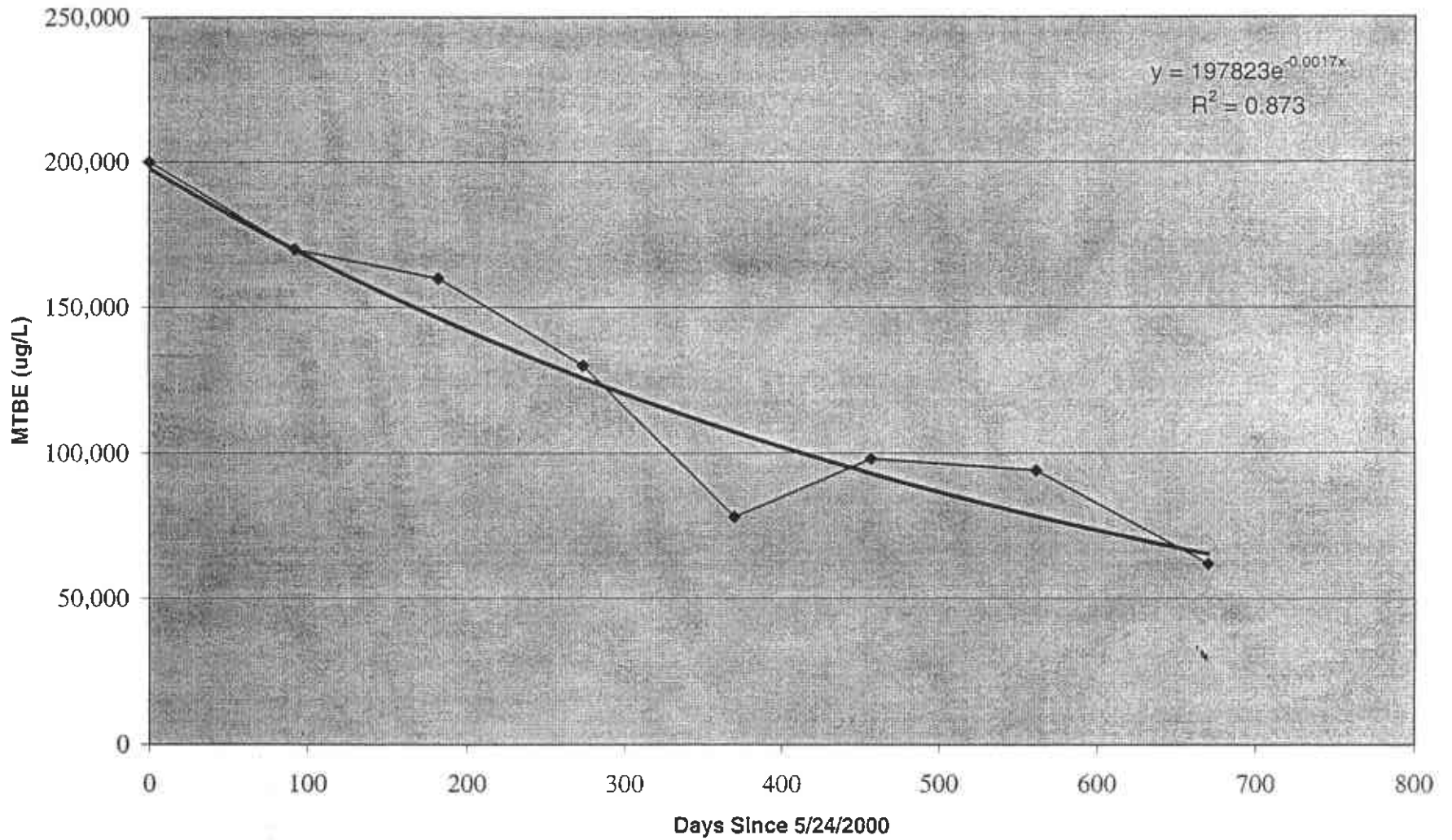
Calculated Half Life = $-\ln(2)/a$ = 58 Days

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



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:

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

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

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

Given

Water Quality Objective: y = 5 ug/L
 Constant: b = 197823
 Constant: a = -0.0017
 Date of first sample: t = 5/24/2000

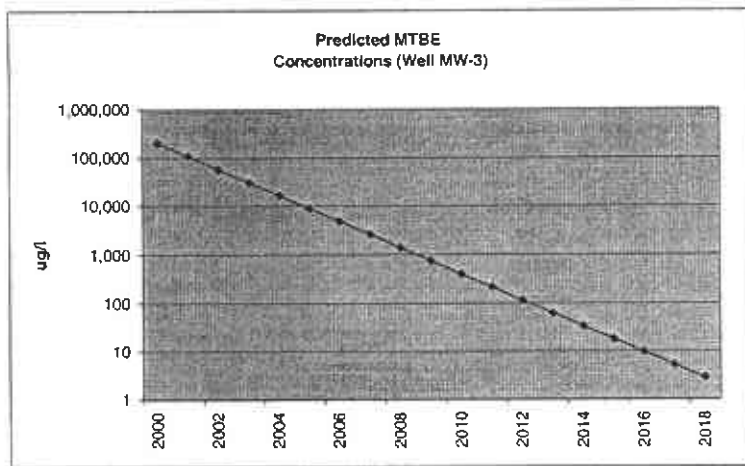
Calculate

Days from first sample: x = 6,227 Days
 Years from first sample: 17.1 Years
 Estimated date of cleanup: Jun-2017

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

Concentration Trend Prediction

Date	Days from First Sample	Predicted Concentration (ug/l)
5/24/2000	0	197,823
5/24/2001	365	106,365
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
Contaminant:	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	578	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

