



SENT
6-9-05

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

RO0000491

June 7, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek:

Alameda County Environmental Health has received and reviewed the "May 24, 2005, Site Conceptual Model report", by Mr. James F. Chappell of Environmental Resolution Inc., and other documents regarding the above referenced site. As you are aware, there have been several meetings and discussions with you and or your representatives as well as with Mr. Mashoon, the current property owner, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- There has been some reduction in the concentrations of the CoCs.
- Additional work regarding the plume delineation work should concentrate on the south, west, and southwest areas for CoCs.
- As you are aware, it is still unclear whether the utility trenches provide any preferential pathway for the plume. Further investigation is necessary to determine this possibility.
- Further investigation of the site is necessary to address the lithological discrepancies revealed by CPTs versus well logs and soil borings in the past.
- Please submit a workplan to address all the above issues.
- Further refinement of the Site Conceptual Model must be performed after the above issues are addressed.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

July 7, 2005 Work Plan

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

PERJURY STATEMENT

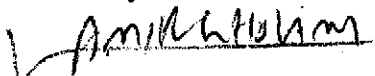
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

Professional Certification

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

Should you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. James F. Chappell, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. M. Mashhoon, Mash Petroleum, Inc., 1721 Jefferson Street, Oakland, CA 94612
D. Drogos, A. Gholami

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director



SENT
03-03-05

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

RO0000491

February 28, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Mr. M. Mashhoon
Mash Petroleum, Inc.
720 High Street
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek and Mr. Mashhoon:

Alameda County Environmental Health has received and reviewed the "Loan Secured by the real property commonly known at 720 High Street, Oakland" document, by Mr. Serge Chemla of America California Bank. Please be advised that this office cannot close the case at this time.

If you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Robert A. Saur, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
D. Drogos, A. Gholami



SENT
02-25-05

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

RO0000491

February 17, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek:

Alameda County Environmental Health has received and reviewed the "December 9, 2004, Comparison of Environmental Screening Levels and Work Plan for Supplemental Evaluation of Soil and Groundwater Report", by Mr. Robert A. Saur of Environmental Resolution Inc., along with the remaining documents regarding the above referenced site.

I have also had several meetings and discussions with you and or your representatives as well as with Mr. Mashoon, the property owner, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- Per document in our files and the above report there were up to 30.8 ppb, 793 ppb, 3.6 ppb, 176 ppb, 53 ppb, 3,620 ppb, and 4,320 ppb of MTBE, Benzene, Toluene, EthylBenzene, Xylenes, TPHd, and TPHg respectively detected in groundwater during the last monitoring and sampling event. This analysis was performed to obtain a more recent current data regarding the above referenced site and its vicinity. The above workplan also compared ESL values to the COCs concentrations at the site for commercial scenario as applicable.
- Per above document there are number of areas where the concentrations of the constituents are above the ESL levels in soil and to some extent in groundwater. This must be addressed along with plume delineation before the case can be considered for closure.
- Develop and submit a Site Conceptual Model (SCM). This must include geological cross sections, interpretive vertical and horizontal drawing of the

plume (not just a plot of laboratory results), depth to groundwater, monitoring wells and screens, conduits, groundwater flow and locations of receptors, etc.

- Include a plot plan with all soil borings along with concentrations at different depths.
- I concur with the above workplan. However, please ensure that your borings does not terminate at 12 feet but rather shall continue to at least 20 feet bgs.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

March 17, 2004 Result of the Work Plan

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

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

Professional Certification

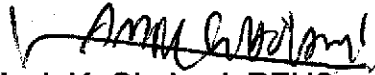
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Robert A. Saur, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. M. Mashhoon, Mash Petroleum, Inc., 1721 Jefferson Street, Oakland, CA 94612
D. Drogos, A. Gholami

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-12-00

20491

December 11, 2000
StID #136

Mr. Darin Rouse
ExxonMobil Corporation
P.O. Box 4032
Concord, CA 94524-4042

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

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

Our office has received the notification letter for the scheduled decommissioning of monitoring wells MW7 through MW11, MW11, MW13, MW15, recovery wells RW1 through RW7 and vadose wells VW2 and VW3 as the above referenced site. ERI states that this work will be done on December 21 and 22, 2000. Our office assumes that the air sparge wells remaining will be re-initiated to enhance bio-remediation soon thereafter and that your annual monitoring of the remaining wells will be done in the first quarter of 2001.

Our office is not aware of any results, qualitative or quantitative, from the past underground tank, piping and dispenser upgrades. This work is being done under the City of Oakland oversight and our office has not received any information regarding this work. Any information requests regarding this work should be made to Mr. Steve Craford of the City of Oakland. Unless a new release can be shown, no additional RP can be named.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Chappell, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. V. Chu, 3915 Forest Hill Ave., Oakland CA 94602

Stat720High

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent 7/28/00

20491

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

July 28, 2000
StID # 136

Mr. Darin Rouse
ExxonMobil Corporation
P.O. Box 4032
Concord, CA 94524-4032

Re: Former Exxon Service Station, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

Our office has received and reviewed Environmental Resolutions, Inc. (ERI) May 1, 2000 Quarterly Groundwater report for the above site. Subsequently, our office reviewed ERI's work plan, **Well and Remediation System and Annual Monitoring** report. After discussion, we concurred on the destruction of wells #3, 7,8,9,10,11, 13 and 15. ERI would restart air sparging in the sparge wells located in the extraction trench to enhance aerobic bio-remediation. Any off-site investigation would be put on hold and lastly, the remaining wells, MW 1,2,4,6,12 and 14 would be sampled annually, presumably within the first quarter of each year.

In addition, our office is aware of the ongoing piping and dispenser upgrade being performed by the current operator. Apparently, soil sampling was not done during the upgrade and the City of Oakland has requested this work be done, with the County's urging. It is unfortunate that any former release from these areas may never be totally identified. Please attempt to obtain and provide our office of a copy of the sampling report and any qualitative description of the original conditions of the piping and dispenser areas.

I understand that because of the renovation and upgrade activities going on at this site, the proposed well destruction and air sparging is on hold. Please continue to update our office in a quarterly report of any activities or change of status on this site.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. J. Chappell, ERI, 73 Digital Dr., Suite 100, Novato, CA 94949-5791

Stat720High

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



*Sent 1/26/00
Including cc's*

R0491

January 26, 2000
StID # 136

Mr. Darin Rouse
P.O. Box 4032
Concord CA 94524-4032

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

Re: Former Exxon RAS# 7-3006, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

Our office has received and reviewed the November 23, 1999 Natural Attenuation and Risk-Based Corrective Action report submitted by your consultant, Environmental Resolutions, Inc., (ERI). The purpose of the report was to determine if conditions indicate that natural attenuation is occurring and whether any risk to human health exists. Although it appears that no human health risk exists as shown in your RBCA evaluation, the data evaluating the natural attenuation parameters is inconclusive. It appears that both aerobic and anaerobic bio-degradation is occurring, however, concentrations of petroleum hydrocarbons remain elevated in a number of monitoring wells. This is true even though the removal of hydrocarbons from groundwater and vapor extraction have long reached asymptotic levels. This is indicative of contamination in saturated soils, which are difficult to remove through these technologies.

Your consultant requests site closure with the continuance of monitoring in wells, MW-2, MW-9, MW-10 and MW-12. Site closure is inconsistent with on-going monitoring. At this time, our office does not concur with site closure. It appears a reasonable alternative is to consider the following options:

- Provide a modified groundwater monitoring schedule, eliminating wells with inconsequential value. The previously recommended wells alone do not appear adequate to characterize this site.
- Consider if another remediation approach would better benefit the site. Perhaps some type of enhanced bio-remediation would better treat the residual contamination.

Please feel free to contact me to discuss these or other options to manage this site. I may be reached at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Chappell, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791

Remed720High

*Sent 1/21/00
Including cc's*

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R2491

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

January 20, 2000
StID # 136

Mr. Darin Rouse
Exxon Company, USA
P.O. Box 4032
Concord, CA 94524-4032

Re: Well Destruction at Former Exxon Station 7-3006, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

This letter approves the destruction of vapor well VW1 as proposed by Lebeck Construction and requested by your consultant ERI. Our office is still evaluating the appropriateness of your recent request for site closure. It is believed that a meeting with you and/or your consultants may be appropriate once we have concluded our review of the cumulative site data, to discuss any differences.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. J. Chappell, Environmental Resolutions Inc. (by fax only)
vwcl-720High

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO491

July 14, 1999
StID #136

ENVIRONMENTAL HEALTH SERVICES

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

Ms. Marla Guensler
Exxon Company, USA
P.O. Box 4032
Concord, CA 94524-4032

**Re: Biodegradation Monitoring Program, Reduced Monitoring and Proposed System
Shutdown at Former Exxon Station 7-3006, 720 High St., Oakland CA 94621**

Dear Ms. Guensler:

Our office has received and reviewed the May 25, 1999 report from Environmental Resolutions, Inc. (ERI), your consultant, the contents of which are referenced above. I have also discussed the site with Mr. Pete Petro of ERI. As you will recall, this report responds to items brought during our April 1999 meeting at the County offices. The following items, which were discussed in the meeting, are addressed in this report:

- It was your belief that the existing soil vapor and groundwater treatment systems had reached asymptotic levels and that natural attenuation would be expected to reduce concentrations further. Therefore, monitoring for specific bio-attenuation parameters would be preferred to continuing to operate the treatment systems with minimal gain.
- The requirements for a "low risk" soil and groundwater site as defined by the RWQCB were discussed as they pertain to this site. The presence of a sheen on groundwater samples was attributed to a non-underground tank source since the groundwater concentrations for TPHg and TPHd in wells reporting a sheen were not at saturated levels. Therefore, it appears that free product from the former USTs does not exist. The off-site well, MW1, has historically been low to non-detect for the petroleum constituents. Therefore, the release appears to be limited to the site. I was also informed that a human health risk assessment had been prepared but had not yet been submitted. The results of the assessment reportedly indicate that no unacceptable risk to human health exists at the site.
- Because of the amount of information existing for the site, a modified monitoring program was proposed to eliminate low impacted and duplicative wells.

Our office generally approves of the above-mentioned proposals with the following conditions/requirements:

- The bio-attenuation parameters, dissolved oxygen, nitrates, dissolved ferrous iron, dissolved hydrogen sulfide, dissolved methane and oxidation-reduction potential are proposed. Please insure that dissolved oxygen and oxidation-reduction potential are tested in the field. In addition, please add dissolved sulfate to your list of parameters. Be sure to provide an interpretation of these results and any recommendations in your future monitoring reports. Wells MW1, MW9 and MW10 will be used to represent conditions outside the plume and wells MW2, MW4, MW12 and MW13 will be used to represent conditions within the plume.

Ms. M. Guensler
Former Exxon #7-30007, 720 High St., Oakland CA 94601
StID # 136
July 14, 1999
Page 2.

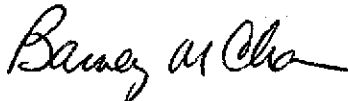
- The modified monitoring schedule proposes to discontinue sampling wells MW9, MW10, and MW-11 for all analytes, due to low historical concentrations. Quarterly monitoring is proposed for wells MW1, MW2, MW4, MW12 and MW13. Therefore, monitoring would also be discontinued for wells MW3, MW6, MW7, MW8, MW14 and MW15. These wells, I assume are being eliminated due to either of low concentrations or duplicative information. Our office agrees with this proposal, except MW6 should continue to be sampled due to historically high benzene concentrations. Please continue to take groundwater elevation readings from all wells when preparing the groundwater gradient map. In order to investigate the sheen reported on some wells, please have your laboratory filter and perform a silica gel cleanup on all samples prior to running TPHd analysis. Please also have your TEPH analysis (8015) extend to TPHmo. This may expose background contamination from fill material.
- Our office agrees that the amounts of TPH removed from the groundwater and vapor extraction systems has reached levels of diminishing returns. They may be shut down to verify that groundwater conditions are representative of actual conditions.
- Please submit your previously prepared health risk assessment.

Prior to recommendation of site closure as a "low risk" you will need to verify that groundwater concentrations have declined and reached equilibrium levels. You may need to provide plots of concentration versus time and/or offer a statistical analysis. You will need to resolve the presence of a sheen in well samples and you must verify no risk to human health or the environment. Conditions conducive to natural bio-degradation must also exist.

You may incorporate the above changes and conditions.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. Petro, Environmental Resolutions, Inc., 73 Digital Drive, Suite 100, Novato, CA
94949-5791

resp720High

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0491

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

March 5, 1993
StID # 136

Exxon Co. USA
Ms. Marla Guensler
P.O. Box Box 4032
Concord CA 94524-2032

**Re: Evaluation of Addendum One to the Interim Groundwater
Remediation Work Plan for 720 High St., Oakland 94601**

Dear Ms. Guensler:

Our office has received the above referenced addendum to the Interim Groundwater Work Plan provided by Mr. Marc Briggs of RESNA. We have also received the fourth quarter 1992 groundwater monitoring report. Upon review of the work plan addendum, I have the following comments to the proposed tasks:

1. Task 1 is acceptable as an interim measure to remove free product in monitoring wells MW-2 through MW-4. It was noticed in the fourth quarter monitoring report that a sheen was appearing in MW-8, MW-12 and MW-13. You should also consider adding a recovery system to these wells if free product starts to appear.
2. Task 2, the installation of two off-site wells at their proposed locations is acceptable. Recall, these wells were requested during a January 22, 1991 meeting at our office. The vapor extraction wells proposed are also acceptable. If the vapor extraction test indicates that this is a viable method, you should add additional vapor extraction wells to address the other areas which have documented petroleum contamination. These areas should include a wider area around the former service island, near the former used oil tank and near B-14. Please keep our office updated as to the progress of obtaining off-site drilling permission in your quarterly reports.
3. Please identify the wells which you will be performing pump tests on. All wells containing free product or sheen must be considered for extraction wells or they should at least fall within the anticipated radius of influence of the pumping well(s). Our office is concerned that in the 12/92 monitoring event TPHg, TPHd and BTEX was found in MW-1, the off-site well, for the first time in a long while. This may be an indication that the hydrocarbon plume has migrated off-site.

Ms. M. Guensler
StID# 136
720 High St.
March 5, 1993
Page 2.

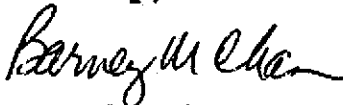
4. Our office has reviewed the Preliminary Time Schedule for the proposed tasks. We would like to see additional tasks based on the results of the vapor extraction and pump tests. The proposal calls for the completion of a report six weeks after completing the pump tests and nine weeks after completing the vapor extraction test. Prior to issuing the report, you should be preparing a work plan for installing a groundwater treatment system and/or a vapor extraction system, or proposing alternate remedial techniques based on your test results. Assuming the tests are favorable, all permit applications should be made and the status of permits should be incorporated in your quarterly reports. Please comment on to the feasibility of performing these additional tasks prior to final report submission.

5. In respect to possible upgradient sources of contamination, our office has reopened the site investigation performed at 752 High St. You should be receiving a copy of the letter sent to the former property owner, Mr. Roy Hatton. You are encouraged to communicate with him to resolve the issue of the soil and groundwater contamination being found either in or around MW-14.

You may proceed with the proposed work plan addendum but please provide a written comment to the above issues **within 30 days** of receipt of this letter.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
M. Briggs, RESNA, 3315 Almaden Expressway, Suite 34, San
Jose, CA 95118
V. Chu, 720 High St., Oakland CA 94601

1-720WPadd

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0491

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

October 29, 1992
STID # 136

Exxon CO. USA
Attn: Ms. M. Guensler
P.O. Box 4032
Concord CA 94524-2032

Re: Request for Workplan Addendum for Former Exxon RAS 7-3006,
720 High St., Oakland CA 94601

Dear Ms. Guensler:

Please be advised that the oversight for the subsurface investigation being performed at the above site has been transferred to the Local Oversight Program (LOP) section of Alameda County's Hazardous Materials Division. You have been notified of this through a "Notice of Requirement to Reimburse" letter recently sent to your attention. Your new contact person within this group is the undersigned Hazardous Materials Specialist.

Upon review of this site's extensive files, it appears that the work proposed in several time schedules, the latest being that found in the October 10, 1991 **Interim Groundwater Remediation Work Plan**, is not on schedule. The files indicates that this site was given a high priority on the list of Exxon sites within Alameda County. This list was provided by Mr. Gary Gibson of Exxon in his letter to Mr. Scott Seery of our office. In fact, this site is number 7 among the 35 listed sites.

I have reviewed the January 22, 1991 notes of the meeting with Mr. Gibson and members of our office discussing this site. As you are aware, the history of this site is very complex. After the removal of four underground tanks in 1987, the excavation pit was allowed to stay open for three years and stockpiled soils were also kept on-site for at least this long. There is some difficulty in explaining the significant diesel contamination being found, since diesel fuel has never been sold at this site. Previous site activities such as acting as a former Standard Oil bulk terminal and offsite upgradient businesses which used various hazardous chemicals including fuels also complicates the issue. What is clear, however, is that there appears to be extensive soil and groundwater contamination onsite in the western and southern areas.

Ms. M. Guensler
Former Exxon Station 7-3006
STID # 136
October 29, 1992
Page 2.

It is also clear that most if not all of the petroleum hydrocarbon contamination found originates from this site. During this 1991 meeting, these conditions were acknowledged and two additional offsite wells, to the west and to the south of the site, were requested by our office in order to evaluate the extent of groundwater hydrocarbon plume. To this date, these wells have not been installed. An **Estimated Schedule of Work** dated October 3, 1990 was submitted by Applied GeoSystems to Mr. Gary Gibson which called for the installation of a remediation system by the end of April 1991. Obviously this schedule was not adhered to. A **Preliminary Schedule of Proposed Remedial Action** was provided in the October 10, 1991 **Interim Groundwater Remediation Work Plan** provided by Resna. Recall, this work plan called for the installation of a groundwater extraction system using carbon canisters and final discharge of treated waters to the sanitary sewer. The preliminary schedule was divided into four sections and an approximate timeframe for each activity's duration. These four sections included: Work Plan for Recovery Well Installation, Engineering Design, Permitting and Construction. The expected timeframe for these actions is 11 months, therefore we would anticipate the construction of the treatment system at approximately October 1992. From the most recent Quarterly Status Report for July-September 1992 it does not appear that work is being performed in accordance to this schedule.

In the event that Exxon was awaiting written approval from our office, I'm sure you are aware that Section 2711 (e) of Article 11 of Title 23 of the California Code of Regulations states that implementation of a workplan may begin sixty (60) calendar days after submittal, unless the responsible party is otherwise directed in writing by the regulatory agency. Therefore this work plan may proceed without written approval.

You are at this time directed to submit a workplan addendum which includes an updated schedule which accurately reflects the anticipated timeframe for the four sections of the previous October 91 workplan. Please provide such a workplan within 30 days of receipt of this letter. In addition, review of the files generated the following County concerns:

1. It appears that since 5/88, (over four years), there has been free product appearing in Monitoring Wells 2, 3 and 4 and that the only "remediation" performed to date has been hand bailing.

Ms. M. Guensler
Former Exxon Station 7-3006
STID # 136
October 29, 1992
Page 3.

1. (cont.) This is not an adequate method to remove free product. Assuming that the start-up of the remediation system is still over one year away, an interim remedial system such as an automated skimmer is requested for those wells showing free product.

2. Your July-September 1992 quarterly status report states under "Work to be Performed Next 12 Months", that you will continue quarterly monitoring to evaluate the trends of gasoline and diesel concentrations and groundwater gradient. There is no mention of starting any of the work proposed in the October 19, 1991 remediation work plan. In addition to providing your workplan addendum, as requested above, and please state the current status of each proposed action and the proposed future actions in all subsequent quarterly status reports. You should also include the following information in these reports:

- * site map delineating contamination contours for soil and groundwater based on the most recent data
- * historical data of groundwater elevations for all wells
- * tabulation of analytical results of all previous samplings

3. As mentioned previously, a minimum of two additional offsite wells was requested during the January 22, 1991 meeting at our office. Please provide a schedule for the installation of at least two offsite wells to further determine the extent of the soil and groundwater plume.

4. There has been mentioned on several occasions the potential of offsite migration of hydrocarbon contamination onto this site, particularly from the former dry-cleaning and auto parts facilities to the north. Please be advised that in order to prove this theory, you must provide an acceptable work plan that either our office or that of the Regional Water Quality Control Board (RWQCB) concurs with. It is noted that MW-14, the down-gradient well to the former offsite UST excavation pit has had low TPHg and BTEX concentrations.

5. Reports have stated that there are three major areas of soil and groundwater contamination, namely around the former service islands, on the southwestern edge of the site downgradient to the original tank excavation and around the former waste oil tank. The proposed extraction well locations apparently will not address the groundwater contamination in this area.

Ms. M. Guensler
Former Exxon Station 7-3006
STID #136
October 29, 1992
Page 4.

5. (cont.) Note that MW-7, the downgradient well to the former waste oil tank, has historically had levels of benzene from 258 ppb to the last reported amount of 390 ppb. What is proposed to remediate the groundwater in this area?

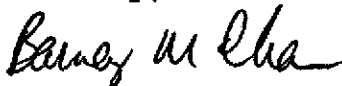
6. Considerable soil contamination still exists on-site. This contamination continues to contribute to the groundwater contamination. Please state what will be done to determine the limits and remediate the high soil concentrations of petroleum hydrocarbon.

Your workplan addendum along with your response to the issues mentioned should be submitted to our office **within 30 days** of receipt of this letter.

This letter constitutes a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by either this office or that of the RWQCB.

You may contact me at (510) 271-4530 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
E. Howell, files

WP-720-Add

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0491

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

May 28, 1991

ATTN: Gary Gibson

Exxon
P. O. Box 4032
Concord, CA 94524-2032

RE: Project # 309A - M
at 720 High St. in Oakland 94601

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$1,074.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Larry Seto
at (415) 271-4320.

Sincerely,


Edgar B. Howell III, Chief
Hazardous Materials Division

EH:lp

cc: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0491

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

May 15, 1990

Mr. Ray Stacey
Stellar Building, Inc.
419 Talmage Road, Suite B
Ukiah, CA 95482

RE: EXCAVATION AT 720 HIGH STREET, OAKLAND, CA

Dear Mr. Stacey:

In your letter dated April 10, 1990 to me, you misinterpreted what I said to you during our phone conversation on March 8, 1990. I did not say that no further excavation was needed at the above site. A new excavation is needed for the new underground tanks.

It is my understanding from our phone conversations that your role is to backfill the former tank pit excavation only. Your proposal dated April 10, 1990, to backfill this excavation is acceptable contingent upon it meets the requirements of all regulators.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Seto".

Larry Seto, Senior
Hazardous Materials Specialist

LS:mnc

cc: Gary Gibson, Exxon
Charlene Williams, DOHS
Victor Chu, Owner
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Rafat A. Shahid, Assistant Agency Director, Environmental Health
RWQCB
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0491

March 22, 1990

Telephone Number: (415)

Mr. Gary Gibson
Sr. Environmental Engineer
Exxon Company
P.O. Box 4032
2300 Clayton Rd.
Concord, CA 94520

RE: 720 High St., Oakland, CA

Dear Mr. Gibson:

On March 21, 1990, I met with Victor Chu, property owner at the above site and Mark East, his contractor from West Coast Tank Testing. I approved their installation plan for new underground storage tanks. The soil that is excavated from the new tank pit area must be sampled. A discrete soil sample must be taken every twenty (20) cubic yards if you plan on disposing of it on-site or as required by the disposal site. Any groundwater encountered during this excavation must be stored and analyzed to determine its proper method of disposal.

If you have any questions, please contact me at 271-4320.

Sincerely,



Larry Seto, Senior
Hazardous Materials Specialist

LS:mnc

cc: Victor Chu, Property Owner
Dino Gonis, West Coast Tank
RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Charlene Williams, DOHS
JoEllen Kuszmaul, Applied GeoSystems
Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0491

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

October 31, 1989

Mr. Victor Chu, Owner
Victor's Auto Repair
720 High Street
Oakland, CA 94601

Dear Mr. Chu:

We have reviewed your underground installation plan for the above site. It will be accepted after we receive and accept Exxon's consultant investigation/remediation report. It is our understanding after Larry Seto's phone conversation with Ms. JoEllen Kuszmaul of Applied GeoSystems on October 19, 1989, that their report will be distributed by Exxon within the next few days.

If you have any questions, please contact Larry Seto, Sr. Hazardous Materials Specialist, at 271-4320.

Sincerely,

Edgar Howell, Acting, Chief,
Hazardous Materials Program

EH:mnc

cc: Dino Gonis, West Coast Tank
Kevin Hunter, Exxon
JoEllen Kuszmaul, Applied GeoSystems
RWQCB
Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Howard Hatayama, DOHS
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0491

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

271-4320

June 24, 1989

Mr. Dino Gonis
West Coast Tank Testing
5899 Santa Teresa Blvd.
San Jose, CA 95123

Dear Mr. Gonis:

Enclosed is a copy of the letter we sent to Victor Chu concerning the installation of new underground tanks at 720 High Street, Oakland.

Sincerely,

R/A. - SLW

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:LS:mnc

cc: Victor Chu
Steve Peppas, Attorney
Larry Seto, Alameda County Hazardous Materials Program
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0491

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Certified Mail #P 833 981 416

May 19, 1989

Mr. Kevin Hunter
Environmental Engineer
Exxon Company, U.S.A.
P.O. Box 4415
Houston, TX 77210-4415

RE: 720 High Street, Oakland, CA 94601

Dear Mr. Hunter:

A letter dated April 13, 1989, from our office, requested information on the current status of the clean-up at the above site. As of this date, we have not received it. Please send us this information within ten (10) days of the receipt of this letter.

If you have any questions, please contact Larry Seto, Senior Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:LS:mnc

cc: Victor Chu, Property Owner
RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Howard Hatayama, DOHS
Larry Seto, Alameda County Hazardous Materials
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0491

April 13, 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Mr. Kevin Hunter,
Environmental Engineer
Exxon Company, U.S.A.
P.O. Box 4415
Houston, TX 77210-4415

RE: 720 High Street, Oakland, CA 94601

Dear Mr. Hunter:

A letter dated February 16, 1989, from our office, informed you that your plan of correction for the above site has been accepted. Please inform us of the current status of the cleanup.

If you have any questions, please contact Larry Seto, Senior Hazardous Materials Specialist, at 271-4320.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Rafat A. Shahid'.

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:LS:mnc

cc: Victor Chu, Property Owner
RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Howard Hatayama
Larry Seto, Alameda County Hazardous Materials Program
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



1049
R0491

Certified Mail #P 833 981 415

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Victor Chu, Owner
Victors Exxon & Auto Repair
720 High St.
Oakland, CA 94601

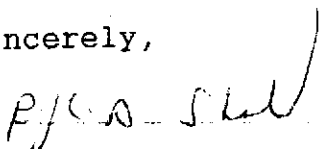
Dear Mr. Chu:

To assist us in evaluating your installation plan submitted on April 24, 1989 for three underground tanks at the above site, the following information is needed:

1. Literature on your tanks, overfill protection box, secondary containment and alarm system.
2. Continuous monitoring with an alarm is required in the annular space of your tank.
3. Site plot plan drawn to scale identifying the locations of the underground tanks, islands and building(s).
4. Method that will be used to remove product from the collection sump(s).
5. Laboratory results from soil samples taken from the tank pit excavation. The samples must be tested for TPH (gas) and BTX and E.
6. An application to operate your new tanks must be filled out and completed.

If you have any questions, please contact Larry Seto, Senior Hazardous Materials Specialist, at 271-4320.

Sincerely,


Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:LS:mnc

Enclosures (3)

cc: Larry Seto, Alameda County Hazardous Materials
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS AGENCY
Agency Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R0491

~~XXXXXXXXXXXXXXXXXXXX~~
~~XXXXXXXXXXXXXXXXXXXX~~
(415) 271-4320

February 16, 1989

Mr. Kevin Hunter, Environmental Engineer
Exxon Company, U.S.A.
P.O. Box 4415
Houston, TX 77210-4415

RE: 720 High Street, Oakland, CA 94601

Dear Mr. Hunter:

Your plan of correction dated, November 17, 1988 and your addendum dated, January 27, 1989, have been accepted by this office with the stipulation that aerated soil with a total petroleum hydrocarbon between 100-1,000 ppm, go to a Class II landfill. Soil with a TPH less than 100 ppm, can go to a Class III landfill. Please submit copies of all laboratory reports and receipts/manifests to our office.

If you have any questions, please contact Larry Seto, Senior Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:mnc

cc: Victor Chu, Owner
RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Howard Hatayama, DOHS
Larry Seto, Sr. Hazardous Materials Specialist
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
DAVID J. KEARS
[REDACTED] AGENCY
[REDACTED] Agency Director



Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621

R0491

Certified Mail #P 833 981 221

January 18, 1989

~~XXXXXXXXXXXXXXXXXXXX~~
~~XXXXXXXXXXXXXXXXXXXX~~

(415) 271-4320

Mr. Kevin Hunter, Environmental Engineer
Exxon Company, U.S.A.
P.O. Box 4415
Houston, TX 77210-4415

RE: 720 High Street, Oakland, CA 94601

Dear Mr. Hunter:

As per your phone conversation with Larry Seto on January 17, 1989, the following needs to be submitted to our office before the installation of new underground tanks can commence at the above site.

1. Current status of your site investigation
2. A remediation plan stating the method for soil and ground water clean up. This does not need to be a detailed engineer or geological plan
3. Date(s) when remediation measures will be implemented

In addition, please identify your disposal method for the free floating product from your monitoring well.

If you have any questions, please contact Larry Seto, Senior Hazardous Materials Specialist at, 271-4320.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:mnc

cc: Victor Chu
Bill Vance, Exxon
Lisa McCann, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer & Environmental Protection Agency
Dwight Hoenig, DOHS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Department of Environmental Health
Hazardous Materials Division
80 Swaney, Room 200
Oakland, CA 94621

R0491

Telephone Number: (415) 271-4320

November 21, 1988

Mr. Kent Sanderson
Exxon Company, U S A
1646 N. California Blvd.
Suite 210
Walnut Creek, CA 94596-9740

SUBJECT: 720 HIGH ST., OAKLAND, CA 94601

Dear Mr. Sanderson:

The Division of Hazardous Materials has reviewed the following Applied Geosystem's reports: #87042-1, #87042-2, #87042-3 and #87042-5 for the subject site. As you are aware, these reports were prepared to assess soil and groundwater contamination resulting from four underground storage tanks. These tanks were removed in April 1987.

According to the site operator, Mr. Victor Chu, new underground tanks are to be installed at this facility. Prior to the installation of new tanks, there are two items that need to be addressed.

A review of the reports indicated that floating product is present at this site. However, a work plan for product recovery has not been received.

Additionally, this office has no records of approved plans for the new installation. Enclosed is a copy of "Procedure for Obtaining Approval for Plans and Specifications for Compliance with State Statutes Pertaining to Underground Storage of Hazardous Substances, April 1, 1985."

As soon as the above items have been received and approved, installation of the new tanks may proceed. Should you have any questions, please contact Edgar Howell, Program Administrator at 415/271-4320.

Sincerely,

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:LR:mam

cc: RWQCB
Victor Chu

Enclosure