

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



09-10-01

PO831

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

April 9, 2001

Mr. Paul Supple
ARCO Products Company
P.O. Box 6549
Moraga, CA 94570

**Re: Request for Deposit for Oversight of Chlorinated Solvent Release at ARCO Station 276,
10600 MacArthur Blvd., Oakland CA 94605**

Dear Mr. Supple:

This letter follows up an original March 8, 1999 request by our office, copy enclosed, whereby we requested a deposit for regulatory oversight of the above referenced site. Because of recent changes in our hourly rate, now \$105.00 per hour and the minimum request time of twenty (20) hours, our office now requests that your deposit be in the amount of \$2,100. Please submit this check, payable to Alameda County Department of Environmental Health and write the site address on the check.

Your prompt response to this request is appreciated. Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

enclosure

c: B. Chan, files

2Dep10600 MacArthur

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0# 831

March 11, 1999
StID# 3756

ARCO Products Co. c/o
Mr. Kyle Christie
P.O. Box 5077
Buena Park, CA 90622-5077

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

**RE: Fuel Leak Site Case Closure, ARCO Station #276, 10600
MacArthur Blvd., Oakland, CA 94605**

Dear Mr. Christie:

This letter transmits the enclosed underground storage tank (UST) case closure letter in accordance with the Health and Safety Code, Chapter 6.75 (Article 4, Section 25299.37 h). The State Water Resources Control Board adopted this letter on February 20, 1997. As of March 1, 1997, the Alameda County Health Services, Local Oversight Program (LOP) is required to use this case closure letter. We are also enclosing the case closure summary. These documents confirm the completion of the investigation and cleanup of the reported release at the subject site.

Site Investigation and Cleanup Summary:

Please be advised that the following conditions exist at the site:

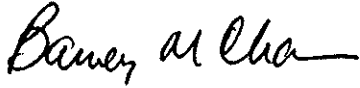
- 8200 parts per billion (ppb) Total Petroleum Hydrocarbons as gasoline, 110, 260, 410 and 600 ppb ethyl-benzene, xylenes, MTBE and perchloroethylene, respectively remain in groundwater at the site.
- 360 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline, 1.8, 14, 6.7, 43, 500 ppm benzene, toluene, ethyl-benzene, xylenes and TPH as motor oil, respectively remain in soil at the site.

Because of the presence of perchloroethylene in groundwater, a risk management plan (RMP) is in place to account for future subsurface activities at this site.

This site should be included in the City's permit tracking system. Please contact me at (510) 567-6765 if you have any questions.

Mr. Kyle Christie
10600 MacArthur Blvd., Oakland CA 94605
StID # 3756
March 11, 1999
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosures: Case Closure Letter, Case Closure Summary

c: Mr. L. Griffin, City of Oakland OES, 505 14th St., Suite
702, Oakland CA 94612

B. Chan, files (letter only)

TrLt10600MacArthur

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 831

March 8, 1999
StID # 3756

Mr. Kyle Christie
ARCO Products Co.
P.O. Box 5077
Buena Park, CA 90622-5077

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

**Re: Request for Deposit for Oversight of Chlorinated Solvent Release at ARCO Station 276,
10600 MacArthur Blvd., Oakland CA 94605**

Dear Mr. Christie:

This letter is a follow-up to my February 3, 1999 letter regarding the fuel and solvent releases at the above referenced site. You will shortly be receiving a Remedial Action Completion Certificate (RACC) aka closure letter for this site for the former waste oil and gasoline fuel tanks. However, you are aware, our office still requires a Risk Management Plan (RMP) as mentioned in my prior letter. This plan should include at a minimum:

- A long term monitoring plan consistent with that of Foothill Shopping Center's. In regards to future monitoring, your RMP should propose the closure of monitoring wells not needed for monitoring of the chlorinated solvent release.
- ACEHS notification prior to construction at this site where soil and/or groundwater will be handled
- An approved plan for the handling of excavated soils or groundwater
- Prohibition of the use of groundwater for any purposes without ACEHS approval
- Prohibition of the installation of wells without ACEHS approval
- An approved Health and Safety Plan for any subsurface work at the site and
- A deed restriction limiting the use of the property to the current scenario unless a risk assessment is done to examine future exposure pathways.

Since our office is closing the petroleum underground tank portion of this site, we will require a deposit of \$1500.00 to continue the oversight of the solvent release. This will be used at a rate of \$100.00 per hour and any remaining funds reimbursed at the closure of the solvent investigation. Please submit a check payable to Alameda County Environmental Health with the site address written on it prior to or along with your RMP.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Dep10600MacArthur

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 831 RO# 2565

February 3, 1999
StID #3756

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

✓ Mr. Kyle Christie
ARCO Products Co.
P.O. Box 5077
Buena Park, CA 90622-5077

Re: ARCO Station 276, 10600 MacArthur Blvd., Oakland CA 94605

Dear Mr. Christie:

This letter serves to update you on the County's review of the above site in regards to the both the petroleum and chlorinated hydrocarbon releases. In reference to the petroleum hydrocarbon release, our office is still reviewing internally the closure document. Because of the potential recommendation for closure for the petroleum release, our office agreed on putting groundwater monitoring on hold in late 1997.

In reference to the chlorinated solvent release, perchloroethylene (PCE), the Water Board policy does not allow closure of these sites where the solvent concentration exceeds MCLs. Because the source of the solvent has not been shown to be from off-site, a Risk Management Plan must be provided. This is required in spite of the fact that the prior submitted human health risk assessment showed that no human health risk exists under current site conditions. Limited long term monitoring for chlorinated solvents must be a part of the RMP.

As you may be aware, the adjacent Foothill Shopping Center, has a similar solvent problem. They have installed off-site monitoring wells and intend to demonstrate that natural biodegradation of the solvent is occurring. It would seem reasonable that ARCO could use a similar approach if active remediation is not being considered. A monitoring plan concurrent with Foothill Shopping Square is advisable.

Please provide an acceptable risk management plan for the residual chlorinated solvent **within 45 days or by March 17, 1999**. In the meantime, our office will keep you updated on the potential closure of the petroleum release investigation.

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. G. VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek,
CA, 94596

D. Lee, RWQCB, 1515 Clay St., Ste. 1400, Oakland CA 94612

Mr. R. Gilcrease, Drake Builders, 1616 23rd St., Galveston, TX 77550

RMP-10600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro#831

September 2, 1998
StID # 3756

Mr. Kyle Christie
ARCO Products Co.
P.O. Box 5077
Buena Park, CA 90622-5077

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

Re: ARCO Station # 0276, 10600 MacArthur Blvd., Oakland CA 94605

Dear Mr. Christie:

Thank you for the submission of the August 6, 1998 Pinnacle Environmental Solutions monitoring report for wells MW-2 and MW-7 at the above site. EPA Method 8260 (GC/MS) was used to confirm the presence of MTBE in groundwater from the wells which had historically detected the highest concentrations of MTBE using EPA Method 8020. Analysis using this method identified 410 ppb MTBE in MW-2 and ND MTBE in MW-7. This is compared with the August 1997 monitoring event where MTBE was reported at 1400 ppb for MW-2 and 310 ppb for MW-7. In addition, TPHg in MW-2 went from 1400 ppb to <500 ppb and from 9500 ppb to 8200 ppb in MW-7. Based on these results, it appears that TPHg concentrations have stabilized and that the actual concentration of MTBE is less than that reported using EPA Method 8020.

Upon review of the closure summary for this site, a number of items still need to be resolved. These items are a result of the Water Board developing policies and the "complex" nature of this site. I would like to mention the following items for discussion and comment:

- The closure of sites with residual MTBE is part of a developing policy of the Water Board. Similar considerations and requirements as applicable to residual TPH and benzene cases must be met prior to closing these sites. A stable or shrinking plume must be shown to exist. Groundwater which is considered a drinking water source should not exceed the proposed MCL for MTBE (yet to be determined). Specific conditions would allow closure of sites with higher MTBE levels if the likelihood of future water use is remote. The likelihood for water use is determined by the local water purveyor and the Water Board.
- The Water Board's policy for residual chlorinated solvent is similar to that for MTBE. Their policy has much more history and is more developed than that for MTBE. Typically those sites which have potential potable water must meet MCL cleanup requirements. Those where groundwater has a low likelihood for drinking water use must perform long term monitoring prior to requesting site closure. A human health risk assessment may also be required.
- Because ARCO and Foothill Square Shopping Center (Drake Builder's) have decided to perform individual risk assessments on their sites and have decided not to dwell on the source of the PCE release(s), both sides are responsible for their own chlorinated solvent release. Therefore, a risk management plan and long term monitoring will be required for both sites.

Mr. Kyle Christie
StID # 3756
10600 Mac Arthur Blvd., Oakland CA 94605
September 2, 1998
Page 2.

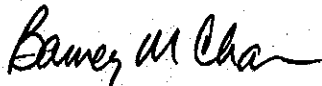
Even under these circumstances, the petroleum fuel release can and should be evaluated separately from the solvent release. If conditions for a "low risk" soil and groundwater case are met, the petroleum LOP (Local Oversight Program) case should be closed. On-going, long term monitoring for chlorinated solvents could be handled under a different case.

The risk management plan requested should include requirements based upon the presence of all residual chemicals at the site. Enclosed please find a copy of a typical risk management plan to be used as guidance. Please incorporate those items relevant for this site.

Please comment on these observations and let me know if your understanding of the site differs from mind. I would welcome any other recommendations you may have.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure (Mr. Christie)

C: B. Chan, files

Mr. G. Messerotes, EMCON, 1921 Ringwood Ave., San Jose, CA 95131-1721

Stat10600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0831

June 15, 1998
StID # 3756

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

Mr. Kyle Christie
ARCO Products Co.
P.O. Box 5077
Buena Park, CA 90622-5077

Re: ARCO Station # 0276, 10600 Mac Arthur Blvd., Oakland CA 94605
Evaluation for Site Closure

Dear Mr. Christie:

Our office has reviewed the historical data for the above site with the intent of compiling a site and closure summary. During this time, we have received recommendations from the Regional Water Quality Control Board regarding the need to analyze groundwater for oxygenates and additives at gasoline leak sites.

You are likely aware of this May 15, 1998 memo, since your name appears on the mailing list. Because of the presence of MTBE in significant concentration in monitoring wells MW-2 and MW-7 and the need to confirm these levels prior to site closure, you are requested to sample these two wells and run the analysis for MTBE by EPA Method 8260. Please also analyze these two wells for TPHg and BTEX as the concentrations of these compounds have historically been highest in these two wells.

In regards to the perchloroethylene (perc) issue, it is anticipated that ARCO will need to submit a Risk Management Plan to address any future exposure to residual chlorinated solvents and petroleum hydrocarbons in groundwater. Results of Foothill Square's off-site investigation indicate that the perc plume does not extend very far beyond the property boundary. Prior to closure of the ARCO site, it will be determined whether any of ARCO's wells need to be included in Foothill Square's Risk Management monitoring plan. Please perform the requested monitoring as soon as possible. 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. G. Messerotes, EMCON, 1921 Ringwood Ave., San Jose, CA,
95131-1721

2mon10600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02565

R02491

R0831

ENVIRONMENTAL HEALTH SERVICES

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

May 13, 1998

ATTN: Sir Or Madam

Barghausen Consulting Eng
18215 - 72nd Ave. S.
Kent WA 98032

RE: Project # 290B - Type R
at 10600 Mac Arthur Blvd in Oakland 94605

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 \$380.70, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager
Environmental Protection

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0#831

December 17, 1997
StID # 3756

Mr. Kyle Christie
ARCO Products Co.
P.O. Box 5077
Buena Park, CA 90622-5077

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

**Re: ARCO Station # 0276, 10600 Mac Arthur Blvd., Oakland CA 94605
Evaluation for Site Closure**

Dear Mr. Christie:

As you are aware, our office has been provided the November 5, 1997 summary report by EMCON detailing subsurface investigations which have occurred at the above referenced site. This information will expedite the County's case closure summary, however, specific details regarding the site must still be extracted from previous reports. During this time while our office is working on the site and closure summary for the site, no further groundwater monitoring is be required.

It is anticipated that the site summary and closure review will occur in January 1998. Pending no need for further information and internal office approval, the closure will then be sent to the Water Board for their sign-off.

Thank you for your cooperation with this project. Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. G. Messerotes, EMCON, 1921 Ringwood Ave., San Jose, CA
95131-1721
Mr. G. VanderVeen, EMCON, 1433 N. Market Blvd., Sacramento, CA
95834-1943

mon-10600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 2565

✓ RO# 831

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

March 27, 1997


Dean Hassanali
P.O. Box 5077
Buena Park, CA 90622

Re: P.S.I. #276, 10600 MacArthur Blvd., Oakland, CA 94621

Dear Mr. Hassanali,

The City of Oakland became the Administering Agency for the Hazardous Materials Business Plan program in Oakland on November 1, 1994. Therefore, your Hazardous Materials Business Plan dated February 24, 1997 was forwarded to the City of Oakland, Emergency Services Division, 505-14th Street, 7th Floor, Oakland, Ca. 94612. Their telephone number is (510) 238-3938.

Sincerely,


Don Hwang
Hazardous Materials Specialist

c: City of Oakland, Emergency Services Division

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

R0831 (10600 MacArthur)

R02580 (10700 MacArthur)

February 15, 1995
StID # 3756

Mr. Michael Whelan
ARCO Products Co.
2155 S. Bascom Ave., Suite 202
Campbell CA 95008

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

**Re: Request for Copies of Technical Reports and Comment on Oct.
1994 Work Plan for Additional Subsurface Investigation at
10600 and 10700 Mac Arthur Blvd., Oakland CA 94605**

Dear Mr. Whelan:

Thank you for providing our office with an update of the investigation at the above ARCO station. It does appear that our office is lacking a number of technical reports appearing on the list of reports given to me. I have noted these missing documents by placing a check next to the document and would appreciate receiving copies of these documents as soon as possible.

A degree of my concerns were addressed during our meeting. These concerns concerned the extent of the petroleum investigation on the Foothill Shopping Square property. Apparently, the bulk of this work is documented in the missing reports I've requested. Certain questions regarding the amounts of gasoline having been removed from offsite and the shallow groundwater gradient should be clarified in the missing reports.

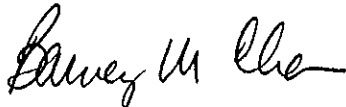
In regards to your October 1994 Work Plan for additional off-site remediation, our office approves of the plan to supplement the existing offsite VES system on the Foothill Shopping Square property with larger diameter vapor wells and sparging wells. We do understand that there may be some opposition to this action from the owners of the Foothill Shopping Square. It is hopeful that the upcoming Pre-enforcement hearing at the County's office will clarify this situation.

At the same time, the responsibility for the chlorinated solvent contamination will be determined at this hearing. You should be prepared at that time to detail ARCO's plan for further site characterization and/or remediation. A revised timetable for future work may be required.

Please provide the requested technical reports **within 30 days or by March 17, 1995**. You may contact me at (510) 567-6765 if you have any questions.

Mr. Michael Whelan
StID # 3576
10600/10700 MacArthur Blvd.
February 15, 1995
Page 2.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
S. Arigala, RWQCB
J. Young, 1921 Ringwood Avenue, San Jose, CA 95131-1721
Mr. R. Gilcrease, Drake Builders, 5201 Sacramento Ave.,
Richmond CA 94804
E. Howell, files
Arco276

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
ARCO Station #276
10600 MacArthur Blvd. and
Foothill Shopping Center
10700 Mac Arthur Blvd.
Oakland CA 94605

Proof of Service of
Notice of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify
that I served Mr. Richard Gilcrease, 5201 Sacramento Ave.,
Richmond, CA 94804
with a copy of the attached Notice of Pre-Enforcement Review
Panel on February 15, 1995 by certified
mailer # Z 196 176 768

Dated: 2/15/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
ARCO Station # 276)
10600 MacArthur Blvd. and)
Foothill Shopping Center
10700 MacArthur Blvd.
Oakland CA 94605
(insert address of property)

Notice of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on March 28, 1995 at 9:00 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Michael Whelan, ARCO Products Co.,
(name)
2155 S. Bascom Ave., Suite 202, Campbell CA 95008
(address)
2. Mr. Richard Gilcrease, Draker Builders,
(name)
5201 Sacramento Ave., Richmond, CA 94804
(address)

Dated: 2/15/95

Barney Chen
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
ARCO Station #276
10600 MacArthur Blvd. and
Foothill Shopping Center
10700 Mac Arthur Blvd.
Oakland CA 94605

Proof of Service of
Notice of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify
that I served Mr. Michael Wheland, 2155 S. Bascom Ave.,
Suite 220, Campbell CA 95008
with a copy of the attached Notice of Pre-Enforcement Review
Panel on February 15, 1995 by certified
mailer # Z 196 176 771

Dated: 2/15/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
ARCO Station # 276)
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Oakland CA 94605
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1. Mr. Michael Whelan, ARCO Products Co.,
(name)
2155 S. Bascom Ave., Suite 202, Campbell CA 95008
(address)
2. Mr. Richard Gilcrease, Draker Builders,
(name)
5201 Sacramento Ave., Richmond, CA 94804
(address)

Dated: 2/15/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



R0831 (10600 MacArthur)

R0258a (10700 MacArthur)

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 15, 1995
StID # 3756

DEPARTMENT OF ENVIRONMENTAL HEALTH

Mr. Michael Whelan
ARCO Products Co.
2155 S. Bascom Ave., Suite 202
Campbell CA 95008

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

**Re: Request for Copies of Technical Reports and Comment on Oct.
1994 Work Plan for Additional Subsurface Investigation at
10600 and 10700 Mac Arthur Blvd., Oakland CA 94605**

Dear Mr. Whelan:

Thank you for providing our office with an update of the investigation at the above ARCO station. It does appear that our office is lacking a number of technical reports appearing on the list of reports given to me. I have noted these missing documents by placing a check next to the document and would appreciate receiving copies of these documents as soon as possible.

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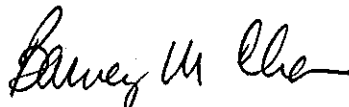
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At the same time, the responsibility for the chlorinated solvent contamination will be determined at this hearing. You should be prepared at that time to detail ARCO's plan for further site characterization and/or remediation. A revised timetable for future work may be required.

Please provide the requested technical reports **within 30 days or by March 17, 1995**. You may contact me at (510) 567-6765 if you have any questions.

Mr. Michael Whelan
StID # 3576
10600/10700 MacArthur Blvd.
February 15, 1995
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
S. Arigala, RWQCB
J. Young, 1921 Ringwood Avenue, San Jose, CA 95131-1721
Mr. R. Gilcrease, Drake Builders, 5201 Sacramento Ave.,
Richmond CA 94804
E. Howell, files
Arco276

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
ARCO Station #276
10600 MacArthur Blvd. and
Foothill Shopping Center
10700 Mac Arthur Blvd.
Oakland CA 94605

Proof of Service of
Notice of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify
that I served Mr. Richard Gilcrease, 5201 Sacramento Ave.,
Richmond, CA 94804
with a copy of the attached Notice of Pre-Enforcement Review
Panel on February 15, 1995 by certified
mailer # Z 196 176 768

Dated: 2/15/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
ARCO Station # 276)
10600 MacArthur Blvd. and)
Foothill Shopping Center)
10700 MacArthur Blvd.
Oakland CA 94605
(insert address of property)

Notice of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on March 28, 1995 at 9:00 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Michael Whelan, ARCO Products Co.,
(name)
2155 S. Bascom Ave., Suite 202, Campbell CA 95008
(address)
2. Mr. Richard Gilcrease, Draker Builders,
(name)
5201 Sacramento Ave., Richmond, CA 94804
(address)

Dated: 2/15/95

Barney Allen
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
ARCO Station #276
10600 MacArthur Blvd. and
Foothill Shopping Center
10700 Mac Arthur Blvd.
Oakland CA 94605

Proof of Service of
Notice of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify
that I served Mr. Michael Wheland, 2155 S. Bascom Ave.,
Suite 220, Campbell CA 95008
with a copy of the attached Notice of Pre-Enforcement Review
Panel on February 15, 1995 by certified
mailer # Z 196 176 771

Dated: 2/15/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
ARCO Station # 276)
10600 MacArthur Blvd. and)
Foothill Shopping Center)
10700 MacArthur Blvd.
Oakland CA 94605
(insert address of property)

Notice of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on March 28, 1995 at 9:00 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Michael Whelan, ARCO Products Co.,
(name)

2155 S. Bascom Ave., Suite 202, Campbell CA 95008

(address)

2. Mr. Richard Gilcrease, Draker Builders,

(name)

5201 Sacramento Ave., Richmond, CA 94804

(address)

Dated: 2/15/95

Bancy Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02491 (SLIC)

R02565

VR0831

RAFAT A. SHAHID, Assistant Agency Director

May 19, 1992

Mr. Michael Wheland
Arco Products Co.
P. O. Box 5811
San Mateo, CA 94402

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

**Re: Arco Station # 276, 10600 MacArthur Blvd., Oakland, CA
94605**

Dear Mr. Wheland,

Review of the deposit refund account status for the above site indicates that the initial funds submitted for the tank removal/ installation and also the site mitigation have been depleted. The case currently has a negative balance of \$ 895.00. You are requested to remit a check for \$ 895.00 made payable to "County of Alameda" at your earliest convenience.

The deposit refund mechanism is authorized by resolution, Section 3-140.4, promulgated by the Alameda County Board of Supervisors.

If you have any questions regarding the above please call me at (510) 271-4320.

Sincerely,

Paul M. Smith
Senior Hazardous Materials Specialist

cc:

Joel Coffman, Resna Applied Geosystems
Dave Landry, Pacific Environmental Group, Inc.
Mark Thomson, Alameda County District Attorneys Office

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R0831

R0 2565

R02491 (SUC)

RAFAT A. SHAHID, Assistant Agency Director

March 4, 1992

Mr. Chuck Carmel
Arco Products Co.
P. O. Box 5811
San Mateo, CA 94402

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

**Re: Arco Station # 276, 10600 MacArthur Blvd., Oakland, CA
94605**

Dear Mr. Carmel,

Alameda County Environmental Health Department, Hazardous Materials Division is in receipt of the several reports prepared by Resna Applied Geosystems (Resna) describing the installation of a proposed vapor extraction system (VES). The proposed system includes the installation of eight 4" vapor extraction wells to a depth of 30 feet. The extraction screen interval described is from 10 to 30 feet below ground surface.

The proposal to install an on site VES treatment which will tie in with the existing off site piping system will be approved upon the receipt of the following:

- 1) A Health and Safety (H&S) Plan prepared by the Contractor/Consultant who will install the treatment system. The H&S plan must specify the name of the site safety officer, medical facility (name address and phone number), site security measures and the monitoring and personal protective equipment available on site.
- 2) A Contingency Plan describing measures to be taken in the event of a system failure; such as pipe line leak or other system malfunction.

Last ground water data available to this office collected August 6, 1991 indicated the presence of floating product in mw-2 (analytical testing was not performed), 430 ppb of Total Petroleum Hydrocarbon as gasoline (TPHg) in mw-3, and 520 ppb TPHg and 1,700 ppb tetrachloroethene (TCE) were reported in mw-4.

You are required to submit a Work Plan to this office within 45 days of the receipt of this letter outlining a proposal which will delineate the on and off site extent of (both soil and groundwater) contamination caused by petroleum hydrocarbons and halocarbons.

You are also required to submit a proposal for a ground water treatment system which will adequately treat petroleum hydrocarbon and chlorinated solvent problems currently identified at the site.

Mr. Carmel
March 4, 1992
page 2 of 2

You are requested to submit the fourth quarterly monitoring report to this Department for review, as of this date it still has not been received.

If you have any questions please call me at (510) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Kyle Christie, Arco Products Inc.
Joel Coffman, Resna Applied Geosystems
Dave Landry, Pacific Environmental Group, Inc.
Eddy So, SFRWQCB
Charlene Williams, DHS
Mark Thomson, Alameda County District Attorney's Office of
Consumer and Environmental Affairs

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02491 (SUC)
R02565 (LOP)
✓ R0831 (LOP)

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

October 7, 1991

Mr. Chuck Carmel
Arco Products Co.
P. O. Box 5811
San Mateo, CA 94402

Re: Arco Station # 276, 10600 MacArthur Blvd., Oakland, CA
94605

Dear Mr. Carmel,

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the reports relevant to the existing off site vapor extraction system and outlining the proposed activities for the installation of an on site vapor treatment and also the installation of a ground water extraction well.

After review of the reports you are requested to have your consultant provide clarification on the following issues:

- 1) You are requested to provide a map indicating the locations of existing vapor extraction wells also indicating the locations of the proposed vapor and extraction wells. Please also provide a plumbing schematic indicating the locations of all piping connections into and out of the Remedi-cat treatment system.
- 2) Please provide this office with information indicating how the efficacy of the treatment system will be evaluated. Evaluation of the treatment system should include sampling at some specified frequency to evaluate the extraction from each vapor well or series of vapor wells of the same line.
- 3) You are requested to provide this office with some estimation of the anticipated length of time which both the off site and the on site system are expected to operate. Please also provide a description of how an effectively site will determined.
- 4) You are requested to indicate how the proposed system will prevent further migration of pollutant off site
- 5) It is my understanding that the existing system was installed by Pacific Environmental Group, Inc. (PEG) and the proposed system will be installed and operated by RESNA Applied Geosystems (AG). There is some concern by this office that there will be difficulty in

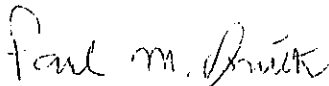
Chuck Carmel
October 7, 1991
page 2 of 2

coordinating the efforts of two consultants so that reports which are submitted for Agency review are intelligible. Please specify the measures which will be taken to integrate information from both consultants. The information in question includes: information relating to the details of the proposed treatment system, quarterly progress reporting and the evaluation of both the new and old system during operation and at the completion of the project and also any proposed ground water treatment proposals or reports.

The installation of a ground water recovery well (RW-1) portion of the Work Plan is acceptable. You are required to provide additional information as it becomes available regarding the feasibility of utilizing RW-1 for ground water treatment in an anticipated future Work Plan proposal for a ground water treatment system.

Should you have any questions pertaining to any of the above requests please contact me at 415/ 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Joel Coffman, Applied Geosystems
Dan Landry, Pacific Environmental Systems, Inc.
Kyle Christie, Arco Products Inc.
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02491 (SUC)
R02565 (LOP)
✓ R0831 (LOP)

August 7, 1991

Mr. Chuck Carmel
Arco Products Co.
P. O. Box 5811
San Mateo, CA 94402

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

Re: Arco Station # 276, 10600 MacArthur Blvd., Oakland, CA
94605

Dear Mr. Carmel,

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the latest Quarterly Ground water Monitoring Report dated July 11, 1991, the Work plan for Subsurface Investigation and Remediation and Addendum One to Work Plan, both dated June 27, 1991.

The latest quarterly ground water report for the five existing on site wells revealed the following information:

- 1) Analytical results collected from monitoring well (MW) MW-1 on February 1, 1990, revealed 91 ppb of Total Petroleum Hydrocarbons as gasoline (TPHg). Most recent results indicated <30 ppb TPHg and <0.30 ppb of benzene.
- 2) On February 1, 1991, MW-2 contained floating product. On 7/31/91 analytical results revealed 240,000 ppb of TPHg and 14,000 ppb of benzene, since that time no additional sampling has been conducted from MW-2.
- 3) On October 30, 1990 results taken from MW-3 indicated 340 ppb TPHg. Since that time no sampling has occurred in this well.
- 4) On April 30, 1991 MW-4 indicated 600 ppb TPHg and 2,200 ppb tetrachloroethene (PCE). On July 31, 1991 results indicated 1,600 ppb PCE, 7.5 ppb trichloroethene (TCE) and 0.7 ppb of 1,2-dichloroethene (DCE).
- 5) Sampling results collected from MW-5 on April 30, 1991 revealed 120 ppb of TPHg.

The work plans submitted recently to this office for review propose:

- 1) To drill additional soil borings to evaluate the lateral and vertical extent of contamination at the site
- 2) The preparation of a Feasibility Study addressing soil remediation and the installation of eight on site vapor extraction wells.

Mr. Carmel
August 7, 1991
page 2 of 3

- 3) The submittal of a work plan specifying construction plans and specifications for the above.
- 4) On site groundwater monitoring wells will be installed, developed and sampled as needed in order to delineate the lateral and vertical extent of ground water contamination.
- 5) Hydrologic tests will be conducted to evaluate the potential migration of contamination hydrocarbons.
- 6) The preparation of a Groundwater Remediation Feasibility Study in conjunction with a vapor extraction work plan as necessary.

At this point in time this office requests that you provide us with a report that describes the remediation measures that have been taken to date that have prevented further migration of all identified contaminants. This office requires a more complete proposed work plan which incorporates the following items:

- 1) All proposed activities are to be 'tasked out' with a committed time line for the initiation and completion of each task.
- 2) You are required to continue/ initiate interim measures to remove free floating product detected in any ground water wells and to conduct quarterly monitoring for each of the wells.
- 3) You are required to specify the locations of the proposed soil borings and the placement of on site wells and also to specify the contaminants sought.
- 4) Provide technical information regarding the design of the proposed on site treatment system and how the system will adapt to the existing off site vapor extraction system that has been installed by Pacific Environmental Group. You are also requested to provide any vapor influence data available on the proposed vapor system.
- 5) An earlier Kaldveer and Associates report (dated October 3, 1988) identified the presence of pesticides and polychlorinated bi-phenyls (PCBs) in soil and ground water. You are required to analyze for these constituents in soil and ground water and to determine the extent of contamination from these constituents.
- 6) You are required to provide specific information to this office outlining a design system for a ground water treatment system which will address the contamination of petroleum hydrocarbon and chlorinated solvents and any other contaminants identified at the above site.

You are required to provide this department with report within 30 days of the receipt of this letter addressing the information outlined above.

R02491

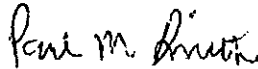
R02565

✓ R0831

Mr. Carmel
August 7, 1991
page 3 of 3

Should you have any questions pertaining to any of the above requests please contact me at 415/ 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Kyle Christie, Arco Products Inc.
Joel Coffman, Applied Geosystems
Dave Landry, Pacific Environmental Group, Inc.
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Mark Thomsen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs

L.S.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02491 (SUC)

R02565 (LOP)

V R0831 (LOP)

Certified Mailer # P367604318

June 21, 1991

Mr. Chuck Carmel
Arco Products Co.
P. O. Box 5811
San Mateo, CA 94402

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

Re: Arco Station # 276, 10600 MacArthur Blvd., Oakland, CA
94605

Dear Mr. Carmel,

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Quarterly Ground-Water Monitoring Report of the first quarter 1991 (dated April 16, 1991) prepared by Applied Geosystems.

The report findings indicate groundwater contamination of petroleum and halogenated compounds. You are requested to submit to this office within 45 days of the receipt of this letter or by July 31, 1991, a work plan specifying the investigative and remedial measures to be employed in adequately addressing the contamination at the above site.

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions to the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and also to:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay Region
2101 Webster Street, 5th Floor
Oakland, California 94612
(415) 464-125

R02491(SLIC)

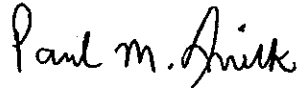
R02565(LOP)

v R0831(LOP)

Mr. Chuck Carmel
June 21, 1991
page 2 of 2

Should you have any questions pertaining to any of the above requests please contact me at 415/ 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Kyle Christie, Arco Products Inc.
Mike Barminski, Applied Geosystems
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs
Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02491(SLIC)

R02565(LOP)

V R0831(LOP)

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

Certified Mailer # P 367 604 428

June 12, 1991

Mr. Chuck Carmel
Arco Products Co.
P. O. Box 5811
San Mateo, CA 94402

Re: Arco Station # 276, 10600 MacArthur Blvd., Oakland, CA
94605

Dear Mr. Carmel,

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Letter Report Quarterly Ground-Water Monitoring Report of the first quarter 1991 (dated April 16, 1991) prepared by Applied Geosystems.

The report findings indicate groundwater contamination of petroleum and halogenated compounds. You are requested to submit to this office within 45 days of the receipt of this letter or by July 16, 1991, a work plan specifying the remedial measures to be employed in adequately addressing the contamination at the above site.

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions to the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Please be further advised that Alameda County Environmental Health Department, Hazardous Materials Division, is currently delegated authority from the San Francisco Regional Water Quality Control Board (RWQCB) to oversee remediation cases within Alameda County. Therefore, this Department will be lead agency for oversight of this case should further site characterization or remediation work be warranted following our review of data incorporated in the pending tank closure report.

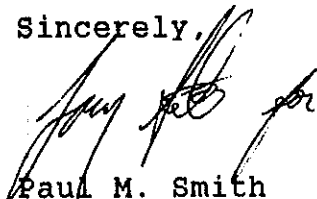
Mr. Carmel
June 12, 1991
Page 2 of 2

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and also to:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay Region
2101 Webster Street, 5 th Floor
Oakland, California 94612
(415) 464-125

Should you have any questions pertaining to any of the above requests please contact me at 415/ 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Kyle Christie, Arco Products Inc.
Mike Barminski, Applied Geosystems
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs
Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department

C.L.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02491 (SLIC)
R02565 (LOP)
✓ R0831 (LOP)

April 20, 1990

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

Ms. Frances Hedrick
Barghausen Consulting Engineers, Inc.
4612 Roseville Road, Suite 103
North Highlands, CA 95660

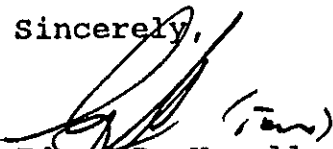
Dear Ms. Hedrick:

Our office has reviewed the installation plans for the ARCO Station 276, located at 10600 MacArthur Boulevard, Oakland. The following items must be addressed before we allow installation of the four tanks:

- Please provide a description of the siphon system for the two unleaded tanks, and clarify Items 18 and 19 on page TL-1.
- Indicate that the tank alarm system is wired to an independent circuit.
- Provisions are to be made for contacting Alameda County and Oakland Fire 48 hours prior to: tank installation; primary piping testing; secondary containment testing; and a final inspection of installation and alarm system.
- A precision test of the tank system is required prior to the business reopening, and the results are to be submitted to this office.
- As-builts are to be submitted to this office within 30 days of completion of the job.

Once we have received a response to these items, we can continue with the installation process. If you have any questions, please call Cynthia Chapman at 415/271-4320.

Sincerely,


Edgar B. Howell, III
Chief, Hazardous Materials Division

cc: Rafat Shahid, Assistant Agency Director, Environmental Health
Kyle Christie, ARCO
Ariu Levi, Senior Hazardous Materials Specialist



Telephone Number: (415) 271-4320

October 6, 1988

Arco Petroleum Products Co.
c/o Ron Cadiz
Crosby & Overton, EMI
8430 Amelia Street
Oakland, CA 94621

SUBJECT: Underground Tank Closure, 10600 MacArthur Blvd.,
Oakland, CA 94605

Dear Mr. Cadiz:

This is to inform you that the original deposit of \$300.00, has been expended and an additional \$300.00 deposit is now required. Please be aware that, depending on the sample analysis results from the above site and possible future site mitigation activities, additional deposits may be necessary in the future.

Should you have any questions concerning this matter, please contact, Mary Jo Meyers-Barnes, Hazardous Materials Specialist, at 271-4320.

Sincerely,

for Edgar B. Howells
Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:MJM:mnc

cc: Arco Petroleum Producers
Mary Jo Meyers-Barnes
Files