

~TRENWELL
Assoc.

10/9/97 Margaret Dahlen phoned: 415-955-9040. Will the 15' setback restriction be stated in the closure ltr? Told her to recall our telecon of 5/15/97, when I indicated that we would either "strongly recommend" or "request" it, but cannot "require" it. We are just waiting for Chevron to close the wells. Then we will write final closure ltr.

- 5/14/97 Phoned Mark Gomez: he is unclear why Tom said we do not have the authority to "require" the setback. Maybe we cannot "require" it since the future land use is unknown. They have a new database (permit tracking system) which can flag restrictions imposed by lead reg agency. OFD should now have copy of all closure letters. **We should cc all our closure ltrs and site mgmt plans to OFD. I told him this should be communicated to Tom so that he can officially tell his staff to cc OFD.** He hopes to have MOA signed by City and all env reg agencies. They have all agreed that copy of closure ltr to City OFD, now known as Fire Services Agency. They will be responsible for entering into computer any info on property in the closure letter. **He will contact Tom.**
- 5/15/97 Margaret Dahlen phoned: 415-955-9040. Will the 15' setback restriction be stated in the closure ltr? Told her we would either "strongly recommend" or "request" it, but cannot "require" it.
- 7/21/97 phoned Phil Briggs: re status of MW destruction: The bid was just awarded to PEG (Pacific Env Group). Low bidder. Told him Im trying to finish these closure before I leave my position.

1/15/97 spoke w/ALL: Curt Peck just averaged the samples. Should he use 95% UCL? Ask ML. ML said it's ok to use plausible scenario. But she said she didn't need to review his revised calcs.

1/30/97 Gave case to ML for review

3/3/97 lm for ML status of yr review?

4/2/97 Sent it to Kevin Graves

4/8/97 Mess fm Jack Gibson Ranger Pipeline contacted him; they want a temp storage space for their piping. Can they use this site? 415-460-0100 They are trying to get onsite today. lm for him: yes it is ok to store piping there. Closure is at RWQCB.

4/9/97 Margaret Dahlen fm Treadwell and Rollo in SF phoned. She represents prop owner (Mr. Falaschi). Wants to know status of closure. Told her. T&R had an ongoing relationship w/prop owner on many properties. Told her about the new case closure ltr, mandated by new H&SC sect.

1/16/97 spoke w/ML: will calculate 95% UCL and see how it affects risk. Gave her the 1/10 fax. Lm CP re this.

3/7/97 revised clos sum; to TP

4/2/97 sent clos sum to KG

4/31/97 received clos sum back fm KG

5/5/97 wrote ltr to RP re well closure

5/13/97 Margaret Dahlen phoned: 415-955-9040. She represents Falaschi Bros. Their company is Plaza Partners. They hired T&R to evaluate any potential problems. No idea what site will be used for. Property will be up for sale. Do I see the contam soil in the 15' setback area as posing a threat to gw?

5/14/97 spoke w/Tom: he said to only "request" or "strongly recommend" they use 15' setback in the case closure cover letter. We do not have authority to "require" it. And cc that ltr to Mark Gomez, Redevelopment Assistant, City of Oakland, Env Services, 1333 Bway, Suite 330, Oak 94612 (238-7314).

11/19/96 **WROTE RISK ASSESSMENT APPROVAL LETTER. MUST DO CASE CLOSURE SUMMARY.**

Lm Phil Briggs: let's talk about the site mitigation measures (for res developmt). Also, do you have current address for Falaschi? Spoke w/PB: he just has Gibson address for Falaschi (Sansome St). Read him the ltr; sounds good. Sent letter out.

11/21/96 mess fm Jack Gibson: he got mess fm Bob Falaschi. Has new #415-460-0100 X13, Fax is 415-460-1099. Address is Attn: John C. Gibson, The Legal Solutions Group, LLP, attorneys at law, 1629 Fifth Ave., San Rafael CA 94901-1828. Lm for him and Faxed him the 11/19 letter.

12/11/96 WROTE CLOSURE SUMMARY

12/24/96 Revised closure summary. Lm for Phil Briggs: must discuss RA and inclusion of 13 ppm benzene from C2 at or around 5.5'bgs. Exact depth? Sample interval was 5 to 6.5'bgs. So they probably took the middle interval: 5.5 to 6.0'bgs; that's normal SOP. And we need a benzene isocon map for existing concs in soil.

1/2/97 Lm Curt Peck: he is back 1/8

1/8/97 spoke w/C. Peck: Phil just faxed him the MW borehole results today. He had previously not had that info (C2). He'd recommend excavating out that hotspot. Why doesn't he first run that # in the RA? He would want to add in C3 and C1 data also. He can rerun those #s. Those samples were probably from 5.5 to 6.0'bgs. But he wants to include them anyway. For plausible, he will include all 3 samples (C1 was ND), and for conservative, he will include the 2 hits (not C1). And we need a benzene isocon map for existing concs in soil (residuals). How about 0-5.5'bgs (what we're basing the RA on). He will use max detected benzene within that sample interval (5.0-6.5'bgs).

1/10/97 Reviewed 1/10 fax fm Curt Peck. I checked the calcs for avg benzene conc; they checked out. I want to give this to Madhulla to check the rest. Risk ends up being 1.88×10^{-4} for conservative scenario, and 8.85×10^{-5} for plausible scenario. So, anything over 1.0×10^{-4} is more towards 10^{-3} , and is unacceptable. Oh dear. But that is the conservative scenario. Should we just accept the plausible scenario? I think so. Must talk w/Madhulla. She is out again today. Lm for Madhulla Explained the whole thing. Should we just accept the plausible scenario?

yes; ok

6/28/96

con't

samples now (instead of his 7). For plausible scenario, he used 7 detects, and 8 non-detects. But he should throw out IX-3, and get only 6 detects. He has the GSI software for Tier 2, but he wanted to go through this to verify the vol factors. So he did it by hand this time. This is the first Tier 2 he has done for Phil Briggs. He used DTW as 5.5'bgs regardless of seasonal fluctuation. **He'll revise it and sent revision to me.**

9/13/96

Phoned Curt Peck: did I drop the ball or did you? He did. He hasn't redone the equations. He hasn't had pressure fm Phil Briggs on this one, bec there were other fires. He also did the calc wrong on the original. He took it to an exponent when it was supposed to be multiplied. On first calc (see red marks), and first calc on 3rd page of calcs (see red marks).

10/7/96

Reviewed 9/27 fax from C. Peck, and 10/2/96 cover letter from Chevron (with original "**Amended RBCA Tier 2 Risk Evaluation**"). Looks pretty good. The combined (gw and soil) risk via Conservative scenario is 4.05×10^{-5} , while via Plausible scenario is 1.7×10^{-5} . So it looks ok. We just have to develop mitigation measures during and after site development, to insure that the 15' setback area is managed. They want to close the Mws. Im Phil Briggs: please wait to close the Mws until Madhulla has reviewed the Risk Evaluation.

I noticed they used the max and avg benzene concs, not the 95% UCL, as Madhulla likes. But since were at 10^{-5} , does it really matter? Im also noticing that this is about the 3rd Risk Eval where they did not use the 95% UCL, but they ARE using the ASTM guidance. Doesnt the ASTM guidance specify the 95% UCL? **Madhulla says no, it does not specify how to determine the conc.** Other EPA guidance specifies this.

Gave the following docs to ML: 10/2 cover letter fm Chevron, origi 9/30/96 Amended Risk Eval, 6/7 cover letter, 5/20 Risk Eval, 2/13 cover letter, and 1/16 QR.

11/19/96

Reviewed Madhullas comments re RA. Questions:
1) She says that further mitigation measures should ensue, since the risk exceeds 10^{-4} . But thats not true. The combined risk was 10^{-5} . 2) she wants a vapor barrier specific for solvents. What solvents?

Spoke w/Madhulla: she said she must have written her comments based on the original RA, not the amended. OK. So RA is good as is. I will draft approval ltr.

- 3/26/96 mess fm Phil Briggs: data being reviewed. Info probably back within next 2 wks.
- 4/29/96 Curt Peck from Chevron's Research and Tech Co. (CRTC) phoned. He is working on the risk analysis. They set an internal deadline of 5/1/96, which is not possible, but they are shooting for 5/15/96. OK? OK. GW should not pose any problem. Soils data is hard to characterize bec it's been extensively excavated. Hot soils both in vadose and saturated zones. Proposes to look only at vadose zone. OK as long as sat zone samples are not now in the vadose zone. Risk analysis will be done by CRTC, not a separate consultant. But he says CRTC IS a third party, and has no allegiance to Chevron. Will use RBCA equations for volatization to bldg (enclosed space) factors. This will be a Tier 2 ASTM RBCA. A couple of concs are higher than Tier 1. He uses the highest conc to compare to Tier 1. Bec you can always average in enough Nds to minimize the avg conc. Told him I probably have highlighted the concs left in place. He is in Richmond: 510-242-7086. CRTC only works for Chevron. He's a RG. Is CRTC owned by Chevron? Yes. SOS thinks it's ok.
- 5/14/96 Curt Peck phoned: Phil Briggs stopped QM in 12/95. He finished his review of the site, and faxed draft doc to Phil. No threat to gw vol to soils; even tho they left soil hits in shallow subsurface; but there is a threat from soil vol to indoor air on the order of 10⁻⁴; driven by high detects in soil in pump islands. Could put restraints on developmt, or could work w/developer to remove the contam soil.
- 6/28/96 Reviewed 6/7/letter from Phil Briggs. They did a Tier 2. Exposure pathway they used was inhalation of vapors by an adult resident in indoor air, via soil and gw volatilization. Benzene was the COC. They determined that the gw poses ~~to~~ a human health threat, so they want to abandon the Mws. They also determined that 90% of the soils do not pose a human health threat. Yes, that means that 10% of the soils DO pose a human health threat. What to do? Chevron "will work w/the po and us to develop mitigation measures for future site developmt." **What hits did he use to determine the avg soil concs for Conservative and Plausible scenarios?**
Phoned Curt Peck: He only looked at benzene concs left in place. We went through them, one by one. **We noted that he used sample IX-3, which was actually removed.** He doesnt think it will change the results much, but he will still run the equations. We still have a concern in the first 15' away from the sidewalk on Grand Ave; there are still hits there. So we will average of 6

- 3/26/96 mess fm Phil Briggs: data being reviewed. Info probably back within next 2 wks.
- 4/29/96 Curt Peck from Chevron's Research and Tech Co. (CRTC) phoned. He is working on the risk analysis. They set an internal deadline of 5/1/96, which is not possible, but they are shooting for 5/15/96. OK? OK. GW should not pose any problem. Soils data is hard to characterize bec it's been extensively excavated. Hot soils both in vadose and saturated zones. Proposes to look only at vadose zone. OK as long as sat zone samples are not now in the vadose zone. Risk analysis will be done by CRTC, not a separate consultant. But he says CRTC IS a third party, and has no allegiance to Chevron. Will use RBCA equations for volatization to bldg (enclosed space) factors. This will be a Tier 2 ASTM RBCA. A couple of concs are higher than Tier 1. He uses the highest conc to compare to Tier 1. Bec you can always average in enough Nds to minimize the avg conc. Told him I probably have highlighted the concs left in place. He is in Richmond: 510-242-7086. CRTC only works for Chevron. He's a RG. Is CRTC owned by Chevron? Yes.
- 5/14/96 Curt Peck phoned: Phil Briggs stopped QM in 12/95. He finished his review of the site, and faxed draft doc to Phil. No threat to gw vol to soils; even tho they left soil hits in shallow subsurface; but there is a threat from soil vol to indoor air on the order of 10⁻⁴; driven by high detects in soil in pump islands. Could put restraints on developmt, or could work w/developer to remove the contam soil.

STW 3001
May 13, 1996

8/23/95 Reviewed 7/14/95 QR by G-R. **GW sampled on 6/5/95 flowed South at 0.08 ft/ft.** Concs were ND or close to ND. First time that well C2 was ND for TPHg and benzene. GWEs decreased significantly. **RP wants a NAZ or closure. They need more quarters of ND for closure. Let's just keep sampling. C2 was the problem well. I want to keep an eye on C2.**

8/25/95 Reviewed file. GW is not a big issue; it's ND or close to it, so NAZ is irrelevant. Reviewed 3/11/94 Touchstone report. The highest residual soil hits are: 1,300 ppm TPHd at 3'bgs, 970 ppm TOG at 3'bgs, 2,600 ppm TPHg at 9'bgs, and 12 ppm benzene at 9'bgs. The 12 ppm benzene > ASTM Tier 1 numbers **except soil vol to outdoor air for res or comm w/cancer risk 10-4.** 1,300 ppm TPHd x .0013 = 1.69 ppm naphthalene, which < ASTM Tier 1 number for soil-vol from soil to bldgs (40.7 ppm) for residential, 10-6. **So the gasoline/benzene hits are the driving factor here.** TOG is a non-issue. What to do? GW hits: if we use the most recent hits: 0.6 ppb benzene < ASTM value for gw-vol to bldgs (256 ppb) for comm 10-6. It's also < 81 ppb (residential 10-6). And it's certainly < gw-vol to outdoor air pathway. The same is true for all past hits of benzene.

Mess fm and to MM and spoke w/him: let's do 2 more sampling events. And do Tier 2 soil-vol to bldgs. For benzene for res or comm? What is the site zoned as? If it's res and comm, let's do res scenario. Their in-house Chevron research group will probably do the Tier 2 equations. Curt Peck, RG is their guy. Ravi is reviewing their proposal for Hayward site. Juliet will be looking at a San Lorenzo case.

11/21/95 Reviewed 8/25 letter. Looks good. They propose doing Tier 2 equations for benzene 10-6 for soil vapors to indoor air pathway for residential scenario, after 2 more quarters data.

3/19/96 Reviewed 10/27/95 QR by G-R. **GW sampled on 9/20/95 flowed S at 0.07 ft/ft.** GW was ND in all 4 wells for TPHg and BTEX. GWEs decreased.

Reviewed 1/16/96 QR by G-R. **GW sampled on 12/12/95 flowed S at 0.08 ft/ft.** GW was ND or close to it in all 4 wells. GWEs were approx the same on 12/12/96 as they were on 12/12/95. **They plan to do quantitative risk analysis to justify closure of the site, in 2nd Q 96.**

Phoned Chevron to check status. His (MM) replacement is Phil Briggs 842-9136. Did they sample gw in 1st Q 96?

3/6/95 Reviewed 2/24/95 wp by PEG. 3 borings off the sidewalk in Grand Ave: 1 MW, and 2 grab gw samples. All 3 will be developed prior to sampling. That should make the temp wells' results more representative of gw. Phoned PEG and spoke w/Steve Krick: how far will screen extend above the gw in MW C-4? Attachment A did not specify. Wants a 3' minimum seal. What will they do if gw is at 3 or 3.5'? Since we're looking for dissolved phase, it's more important to get a good seal rather than make sure the screen is above gw. I'll trust his judgement.

Wrote acceptance letter to RP.

3/30/95 The letter to Falaschi got returned to sender. Got new address for Gibson law firm: 160 Sansome St., Suite 1200 SF 94104. Sent revised ltr to Falaschi c/o Jack Gibson.

5/4/95 **site visit for MW installation**

6/13/95 mess fm Phil Tagami: what's the status of this site? He has a potential buyer/renter.

Reviewed 4/27/95 QR by Gettler-Ryan. GW sampled on 3/22/95 flowed S at 0.06 ft/ft. GW was ND for TPHg and BTEX except well C2, which had 590 ppb TPHg, ND benzene and toluene, and some EX. Chevron's 5/24/95 cover letter says that "due to the presence of utilities, only the permanent MW was installed. We will forward a report. . .shortly."

Phoned Phil Tagami: (268-8500) Hes with California Commercial Investments. (Now on the other side of the fence re this site) I told him we didnt get the report of MW installation. **His potential buyer wants to put houses on the site.** Moving historic houses to this site. He wanted to know how long before case closure? Hard to say. Depends on results in this forthcoming report. Hell call lawyer Jack Gibson, and try to get the report, so as to move things along.

8/9/95 Received the report

8/16/95 Reviewed 8/3/95 "Soil and GW Invest" ltr report by PEG. Although the boring log indicates "no product odor," its weird they analyzed the sample from 5'bgs in well C4, when first water was at 18'bgs.

Attached to this is the 7/14/95 QR by Gettler-Ryan. **GW sampled on 6/5/95 flowed South at 0.08 ft/ft.** This pot. Map included the new well C4. GWEs decreased, as did concs in well C2. The new well C4 was ND. **Chevron wants NAZ or closure.**

A) LOAD STANISLAUS DB & Application Files

- check for available HD space
 need at least 20 MB (4 meg for Stanislaus) (3.6 Meg for RBase) - 12 Meg free needed.
 At bottom of list shows xxx bytes free.

```
c:\> dir *.* ↓
```
- Make Billsys directory off of Root
 (for application to Run)

```
c:\> ↓
md billsys ↓
```
- Go to new directory - after hitting <enter> the prompt will show that you are in billsys directory

```
c:\> cd \billsys ↓
c:\billsys>
```
- Load all Application files plus Stripped Stanislaus databases (db) Billsys & History

 - Put in Green disk "Stanislaus Pgm" into drive
 - Type `c:\billsys> copy a:*.*`
 - Type `c:\billsys> DIR` — gives list of files
 - Type `c:\billsys> pkunzip RBase` → lots of files will "unzip"

→ Rewrite the 2 files
 • PKzip.exe & • PKunzip.exe
 RESPOND either Y or N!

~~- In order to load History Database (stripped) - Type~~
~~c:\billsys> pkunzip billsys~~
- Load Billsys DB with ALCO examples entered (By Connie & Jenny)

 - eject 1st disk from drive
 - Insert Yellow disk "STANISLAUS - Loaded w/ ALCO Examples"
 - Type `c:\billsys> dir a:` — see the 2 sets of DB files
 - Type `c:\billsys> copy a:*.*`

DEPARTMENT OF ENVIRONMENTAL HEALTH
 State Water Resources Control Board
 Division of Clean Water Programs
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577
 (510) 567-6700
 RAFAT A. SHAHID, DIRECTOR



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

install SBs in the sidewalk, and that I'll try to help them w/encroachment permits.

- 1/5/95 discussed w/SOS. He recognizes physical constraints and other reasons; therefore ok to not delineate in N direction. **Add 8010, 8270, and TPHd (how bout TOG?) to C1** to see if there's any release to gw from soil hits in WX3. May need another well NE of C1 to measure hits around WX3 in gw, bec C1 is not exactly DG of WX3. Phoned MM: he thinks there was a grab water sample from waste oil pit analyzed for TPHg, btex, TPHd, TOG, 8010 and metals: Dec 92: only got 170 ppb TPHd, 17 ppb Ni (really ND), and .07 Zn. It's in 1/12/93 Touchstone report. Got it. This was done before the overex work. OK, unless we were just sampling rainwater. Asked him to add the gw results from 12/92 to tabulated results. OK. Since we got a hit of 1,2-DCA in C2 in 12/92, he'll run the current gw sample for 8010.
- 1/6/95 spoke w/MM: would rather put SBs in the Avenue, than in the sidewalk, and stay out of the driveway. We discussed putting the MW at the edge of the parking space in the Avenue. **He'll fax a map w/SB and MW locations;** wants 2 instead of 3, but I stressed the need for 3. Make sure the MW is S or SE (DG) of C2!
- 1/11/95 Site visit to measure MW distances. Confirmed that the PEG map is the more accurate re location of C2, rather than the Touchstone map. Reviewed MM's 1/9/95 fax. Phoned MM: We'll take grab water samples in the borings (HPs), and one MW on east side of driveway, bec. the MW will then be DG of the site as a whole.
- 1/17/95 mess fm and to MM: let's do grab water in both SBs, plus a MW.
- 2/3/95 mess fm MM: he wants extension of wp submittal to Feb 20.
- 2/8/95 left mess: ok.
- 2/17/95 Reviewed 1/26/95 QR by Sierra. GW sampled on 12/12/94 flowed S at .06 ft/ft. Concentrations remain low in all 3 wells: 77 ppb TPHg and up to 2.9 ppb benzene.

10/7/94 Robert Falaschi phoned re status.

10/17/94 Reviewed file. Some hits were left in place after the big overex. Particularly along Grand Ave: 2600 ppm TPHg and 12 ppm benzene in IX-12. But also along N prop. boundary: 1300 ppm TPH-d and 970 ppm TOG in WX-3. They have to define the extent. So they have to do more soil invest. towards and probably under Grand Ave, and also in adjacent prop. to the N. How about grab gw sampling as well (at least in Grand Ave)? left mess for Rbt Falaschi re this. . . .Met w/MM at 609 Oak St. He said they'd put in DG well on Grand Ave.

11/14/94 mess fm and to Rbt Falaschi.

11/15/94 spoke w/Rbt Falaschi. He's concerned; wants Chevron to keep moving along w/project. Retaining wall is on their prop, then about 7-10' farther up the hill to the fence is also their prop. Before they pave site for parking, he wants to be sure they don't have to dig any further.

spoke w/MM. He has the QR for Sept sampling. Discussed delineating offsite contam. It's extremely steep on N side. I told him what the residual concs are. He wants to look at this data, and provide a sketch of where the DG well would go. But first will submit the QR.

12/9/94 Received 10/28/94 QR by Sierra.

12/22/94 Reviewed 10/28/94 QR by Sierra. GW sampled 9/26/94 flowed South. Only up to 51 ppb TPHg and 4.2 ppb benzene (C3). Concs decreased overall, as did GWES; after all, it's autumn. I don't see the need for more MWs at this point.

1/4/94 MM phoned. He wants to continue QS for 2 more Qs. If concs are still low, doesn't want to add DG well. Still of concern are the vadose zone soils and their lateral extent; maybe delineate w/SBs, maybe convert one to a MW. Discussed it w/MM. Re delineating the contam around WX-3; do we even need this data? The concs decrease as we go away from the source area; this was seen during the original and first overex samples. Also, the retaining wall and the 45% slope uphill and above it will make it difficult to do SBs. RE delineating the contam near Grand Ave (IX-12): agrees to do SBs and maybe convert one to a MW. How many? three in a "U" shape, in sidewalk and Ave. He said the City doesn't want SBs in sidewalk. If AlCo specifically requests sidewalk borings, they might have a different attitude. Agreed on a wp in 30 days (Feb 6, Monday). In my acceptance letter, say it's County preference to

5/13/94 Continued review of the 3/11/94 "Soil Excavation and Remediation Report," by Touchstone Developments. Spoke w/Jeff Monroe of TD. Asked for documentation of soil disposal. He says Chevron has it. The SP that went to Forward went under non-HW manifest (approx. total of 350-375 yd³). Asked him for a table w/final excavation samples and their concs. He said OK. Fig 3 has the final excavation samples. WO-7 in Fig 3 was removed (excavated). MM's 4/25/94 cover letter says that it appears no further soils work is warranted nor possible, and they plan to install more wells as per the 2/17/93 wp by PEG.

Phoned MM: suggested that we resample the 3 MWs prior to installing additional well(s). Asked him for doc. of soil disposal. He'll phone landfills to see if they can get a 1-pg letter fm them. Can sample wells by end of month. Results mid June (or earlier).

5/19/94 Mess. fm Jack Gibson. Wants to have a conference call w/Rbt Falaschi on 5/20. lm for JGibson, saying I'll be on vacation, but will phone him when I get back.

6/1/94 left mess. J. gibson, MM

6/6/94 MM phoned. He spoke w/Falaschi last week. Chevron will sample wells this month. This week or next week. Working on soil disposal doc.

Spoke w/J. Gibson. He got a report fm Chevron and wants to discuss it.

6/7/94 Prepared for, then had conference call with Jack Gibson and Robert Falaschi. Discussed the 3/11/94 Touchstone report. Samples IX-11, -16, and -21 probably leaked from the lines. So we have a gasoline problem near the Grand Ave. border, and a TOG problem near the rear of the property. 970 ppm TOG left in place along the retaining wall.

6/29/94 Reviewed 6/14 correspondence fm Touchstone. Documentation for 666 yd³ soil offhauled.

7/1/94 mess fm MM: wells were sampled on 6/22; data by 7/6; report by early August.

9/2/94 Reviewed 8/15 letter fm MM, and 7/25 QR by Sierra. Gw sampled 6/22 flowed S toward the Lake and had up to 200 TPhg (DG well C-2) and up to 5.6 benzene (C-3). It's been 1.5 yr since this gw was sampled. Do we need a DG well anymore?

- 11/4/93 Wrote letter to RPs. . .accepting 10/27/93 PEG workplan.
- 12/7/93 Spoke w/Mark Miller. Chevron hired Eichner Construction Co. to demolish the building. They need a 30-day posting period w/the City's Building Dept., which would delay the project to early January. However, they may get a waiver for this. . .
- 12/21/93 Message from M. Miller: City waived the 30-day posting requirement verbally only; not yet in writing. Marla (?) Brooks from City is supposed to write a letter, but he has not been able to reach her by phone. . .waiting for letter.
- 12/28/93 Site visit; **demolition has begun!**
- 12/30/93 Site visit; building is gone.
- 1/3/94 Jeff Monroe from Touchstone Development called. They want to sample today (hoists, waste oil pit, pump islands, lines). **They found another waste oil UST (about 250-gallons) beneath the former building.** GW starting to enter pit at about 7' bgs. Site visit. They sampled the first waste oil pit, oil/water separator (sump), and hoists. See field report.
- 1/4/94 Received fax from Golden West (health and safety plan for upcoming tank removal). Met w/Jeff Monroe. He delivered the tank closure plan; we went over it and I approved it.
- 1/5/94 Removal of 2nd waste oil tank and sampling of islands. See field report.
- 1/7/94 Bill Turner from Neighborhood Assoc. called to check the status.
- 1/20/94 BC onsite for sampling.
- 1/21/94 SH onsite for sampling.
- 3/7/94 Spoke w/MM; he's waiting for the Touchstone report on overex and resampling. It's due to him this week.
- 4/8/94 left mess. MM re report.
- 4/11/94 mess. fm MM: has report; will try to get to me by end of week.
- 4/20/94 Mark will probably send report today

8/20/93 Waiting for RH's 13267 letter to RPs. Changed RBase to new RP address. Sent revised Notification letters.

8/23/93 Spoke w/MM. The contract to demo bldg is written, but not yet signed. Chevron will contract w/the demo contractor directly. One MW box was damaged but is being repaired. Drums of purge water removed.

9/3/93 Gil phoned re where is letter to RPs? Spoke w/RH. He hasn't yet written letter to RPs. ~~Letter sent out one~~
~~for [unclear] 8/17.~~ left mess. Gil. RH hopes to write it next week.

9/14/93 Revised list of items needed from RP and faxed to RH

9/15/93 Discussed wording of 13267 letter w/RH

9/29/93 Wrote cover letter to RPs w/"Legal Request" from RWQCB

10/5/93 Mess. from MM: Received RB's letter. Is confused as to contents of letter and how it relates to our panel review. . .the items we agreed to in particular are not covered in the letter. . .doesn't remember being asked to prepare a "technical report". . .other party is not responsive as of late. . .

10/7/93 spoke w/Gil. . .suggests I should write a letter to RPs clarifying the RB letter
spoke w/MM. building has not been demolished yet. Came to an understanding of what the RB letter is requesting. They need a deed of trust from Jack Gibson. . .he seems to be delaying things. Can Chevron write wp themselves? He's done it in CC County.

10/8/93 wrote letter to RPs clarifying the RB letter.

10/15/93 Reviewed 10/11 letter fm MM.

10/21/93 Spoke w/Gil. He didn't get my letter yet.

10/29/93 Reviewed 10/27 letter fm MM and 10/27 workplan by PEG. Spoke w/MM. They will scrape N wall, and excavate more on W wall of w.o. pit. Afraid that the retaining wall may be part of the foundation for the bldg up on the hill. Therefore, contam. may be left in place. How will they address it? Gw monitoring. Page 9 in wp, first paragraph, means **after** overexcavation (for piping), and initially, for dispensers. Chevron can't wait anymore for Falaschi to respond and demo bldg, so Chevron will go ahead and contact a demolition man themselves.

blighted; piles of concrete chunks, soil, abandoned bldg. He said RPs are 80% in favor of demolishing bldg, as per their atty J. Robbins.

6/23/93 Sp w/MM. They'll go ahead and install MW. Property owners are close to decision re fate of site.

~~6-29 Pre-Enf. Panel Review~~

7/1/93 Reviewed 6/25/93 letter from Chevron. They did DTW measurements on 4/23/93, and found gw flows SSW. PEG is "moving forward" w/MW installation.

7/7/93 Spoke w/TP. I should threaten them with a Pre-Enforcement Meeting. Spoke w/MM and told him. Jack Gibson is on vacation for 2 weeks, starting today. Back on 7/19. MM will phone property owner. We need deadlines and schedules.

7/9/93 Message from MM: Brothers have finally agreed to demo bldg. Chevron and brothers have finally agreed on how to divide the costs. J. Gibson in Europe til 7/19. J. Robbins back 7/12. Robbins will phone DA.

7/12/93 Spoke w/Gil Jensen. Did Tom schedule this for a panel review in July? Let's give them 30 days (til Aug 12) to demo the bldg. Or else we'll schedule them for a panel review in August. Should I write a letter? To both RPs? Can't require them to demo a bldg. Therefore, let's have the meeting. left mess. Jon Robbins 842-2642. Wrote Pre-Enforcement panel review notification letters to RPs.

7/26/93 Received fax from Kathy Sharrock of Jon Robbins' office. Includes a letter from J. Robbins dated 7/16/93 stating he cannot attend the meeting for 7/27. Spoke w/J. Gibson re Notice of Review Panel.

7/27/93 Pre-Enforcement Review Panel attended by Mark Miller and Walter Posluszny of Chevron, Robert Falaschi and Jack Gibson, RH, GJ, TP and JE. We need a wp for remediation of wo pit, piping hits, soil hits in one MW, 2 more MWs, and hydraulic hoists (not discussed). Find out how long it will take them to get permits for demo of bldg/canopy/pump islands. Add to letter: if we get hits after next phase of remed., then another wp. Send MM recent data on former Exxon at 500 Grand Av (SH's site). I drafted a letter to RPs and gave to RH to revise w/13267 lingo.

New address for J. Gibson: 22 Battery St., 10th Fl, SF 94111

(summary of recent field work).

- 1/21/93 Spoke w/MT. Gil Jensen will be contact for future DA involvement. Wrote letter to RP requesting field work within 30 days.
- 1/22/93 Site visit.
- 1/28/93 MT message: He told Falachi's atty that technical people will handle case now, and order will be suspended unless a problem develops. Gil is my contact.
- 2/10/93 Site visit. Big pit has been backfilled!
- 2/11/93 Spoke w/B. Turner w/Merchant's Assoc. re site update. He knows MT was transferred. MT asked BT not to correspond w/RP bec. it may eopardize his credibility.
- 2/24/93 Rcvd letter from RP dated 2/22/93, and workplan for a downgradient MW, by PEG, dated 2/17/93. **We'll need another mw within 10' of w.o. pit at some point.**
- 3/1/93 Wrote letter to RP accepting the 2/17/93 PEG wp.
- 3/5/93 Rcvd letter from John Gibson dated 3/2/93. He doesn't know what happened to the drum.
- 3/10/93 Sp w/MM. Agreed to take DTW measurements and determine gw flow direction prior to placing the next MW.
- 3/19/93 Overexcavation and resampling of waste oil pit!
- 3/25/93 Sp w/MM; said they backfilled pit.
- 4/19/93 Sp w/MM; asked for results of w.o. pit. Hits on 3 sides; he'll send results.
- 5/17/93 Reviewed 5/5/93 letter from Chevron w/lab data. They got up to 21,000 ppm TOG, 3,200 ppm TPH-d, 730 ppm TPH-d, 2.1 ppm benzene, and some Cl HCs left in pit.
- 6/2/93 Mtg w/MM. No definite plans to demolish bldg. Piping area needs to be addressed. Did another round of DTW measurements. GW flows same direction. **I requested this data.** We definitely need a MW near w.o. pit bec. we think gw has been impacted. He'll go ahead and schedule MW installation.
- 6/22/93 Sp w/MM. Seems like he's just stalling. Told him that the Merchants Assoc, Neighborhood Assoc., and DA want to know what's going on here. Site still looks

Mark Thomson.

- 9/11/92 JE spoke w/Phil Tagami of Merchants Assoc. re site status. Referred him to Mark Thomson.
- 10/23/92 Sent letter to RP's lawyers re Notice of Hearing
- 11/16/92 JE met w/MT, then conference call w/atty's for RPs: J. Gibson and J. Robbins. They agreed to characterize and dispose SP and pit water in 3 wks; do 2 SBs and 3 MWS in 1 month. Final workplan to us w/in 30 days after SBs/MWS installed.
- 12/3/92 Site visit. Met Mr. Falaschi onsite by chance. JE spoke w/Mark Miller of Chevron.
- 12/10/92 JE spoke w/MM. The SP and pit water was sampled already; he okayed Treadwell's wp
- 12/14/92 MWS installed by Pacific Env. Gp (PEG). Site visit by JE.
- 12/15/92 Site visit. Fence is being installed around site. PEG is installing MW3 and SB.
- 12/16/92 Received lab results for SP and pit water. Fuel SP is clean and will be backfilled. W.O. SP is dirty. Pit water to be pumped out and transported to Chevron's Richmond Terminal.
- 12/17/92 Site visit. New fence is up. Received lab results for soil samples for MWS. MW2 had a hit (2300 ppm TPHg and 13 ppm benzene) at 5-6.5'bgs, but was ND at 8.5-10'bgs. The SB has very low levels at 6.5-7'bgs.
- 12/18/92 MM thinks a dispenser may have leaked, causing contam. in MW2. There was no soil sampling below dispensers. **This needs to be done.** MM wants to wait until bldg is demolished, bec. canopy footings are in the way.
- 12/22/92 Received lab results for MW1-3. MW2 has hits (640 ppb TPH-g and 63 ppb benzene and 3.5 ppb 1,2-DCA). MW1 and MW3 are ND for TPH-g, BTEX, and Cl HC's.
- 12/24/92 Rcvd lab results for metals in gw. MW2 and MW3 have low levels of metals. All 3 are ND for TPH-d, TPH as oil. MW1 is ND for Cl HC's.
- 1/20/93 Rcvd letter from Chevron dated 1/15/93, Touchstone report dated 1/12/93, and **PEG report dated 1/15/93**

Site Summary 3615
key dates only
Former Service Station
460 Grand Ave.
Oakland CA 94610

- 11/8/90 UST Closure plan approved by AlCo
- 11/29/90 Removal of 3 gasoline USTs and 1 waste oil UST.
Waste oil pit had 24,000 ppm TOG, 7,100 ppm TPH-d, and
400 ppm TPH-g at 7.5' bgs.
Fuel pit water had 2,300 ppb TPH-g, 53 ppb benzene.
Fuel pit soil had ND or low levels.
Pipeline had up to 1,700 ppm TPH-g.
- 12/4/90 ULR filed
- 1/29/91 "Removal of Inactive USTs" report by Treadwell
- 2/25/91 Letter from AlCo to attys Adams, Sadler and Hovis.
Requests a preliminary subsurface investigation.
- 4/30/91 "Workplan for Subsurf. Invest." by Treadwell
- 5/16/91 Letter from AlCo to RP, giving conditional approval to
wp.
- 6/14/91 Revised Workplan. . .addresses all 3 items in AlCo's
letter dated 5/16/91 BUT delays characterization of
w.o. pit. A cover letter from atty's is part of this.
- 7/1/91 Letter to atty from AlCo re review of revised wp
- 8/23/93 Letter to Chevron from AlCo; considering whether to
issue a H&SC order.
- 9/18/91 Letter to AlCo from Chevron, requesting they not be
named as RP
- 1/3/92 Notification letter sent
- 7/13/92 JE spoke w/Mark Thomson of DA's office.
- 8/20/92 JE spoke w/Peter Brewer, atty w/Adams, Gibson and
MacPhee, for Falaschi. Are we going to sue them?
Their insurance covers lawsuits, so that'd be good. I
requested that Mr. Brewer speak w/Mark Thomson.
- 9/10/92 JE spoke w/John Woodbury from Oakland Councilmember
Mary Moore's office re status of site. Referred him to

6-22-93 Sp w/M. Miller. He had talked to ^{their} atty J. Robbins; a decision was to be made last Wed. on fate of bldg + prop. Looks 80% in favor of demolition. Asked him to phone me as soon as he talks w/ atty. Told him the cmnt + DA are concerned w/ site's blighted appearance.

6-23 Sp w/M M, who sp w/ J. Robbins. They'll go ahead + install DG MW. P.Os are close to decision. Jack Gibson - Falaschi atty 415-421-6900 maybe I'd call him.

6-25 Sp w/Gil J. He suggests having a Pre-Enforcement mtg. Set a date w/TP, then we'll decide if we'll serve RPs or their attys.

3615

3-25-93 M. Miller said they backfilled pit.

4-19-93 Spoke w/MM. Asked for results fm w.o. pit. Hits on ~~2~~³ sides, ND on other 2. He'll send the results.

5-17-93 Reviewed 5-5-93 ltr w/data fm Chevron. Results for w.o. pit overex:

Up to 21,000 ppm	TOG
" 3,200 ppm	TPH-d
" 730 "	TPH-g
" 2.1 "	benz

+ some cl HCs left in pit.

6-2-93 Mtg w/M. Miller.

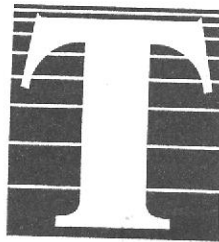
No definite plans to demo bldg. Piping area needs to be addressed.

Offsite well: he thinks they got City encroachment permit. They did another round of DTW measurements; shows gw flows same direction. Pls submit the DTW data + potential metric map. Mark ~~will~~^{may} write a ltr to p.o. + ask for a date they can make a decision on fate of prop. + bldg. in particular. We need a mw near w.o. pit bec. we blv gw h b impacted. Will cc me + DA. He'll go ahead + schedule mw inst.

3615

3-11-93 Mess. fm S. Krick Krick. He d n Y
anything as - drum.
Mess. fm M.M. Will overex w.o. pit on
3-16.

3-16 Site visit. Not ready to overex bec
they're clearing
debris away 1st
to gain access for
backhoe. Then they
have to break up
asphalt around
the pit. Pit has



Mike Tambroni
**Touchstone
Developments**
Environmental Management
P.O. Box 2554
Santa Rosa, CA 95405
Office: (707) 538-8818
SF Office/Fax: (415) 386-8791
Mobile: (707) 484-6557

water w/ greasy, black appearance. Must be
pumped out. Mike phoned Chevron.

3:41 mess. fm Mike Tambroni

3:41 Mike w/Touchstone
broke asphalt, moved soil
water level is 1' bgs. Chevron's
respsblt to remove water.
prob. Wed. Then prob. overex +
sample Th. am.

3-19 Overex + resamplg of waste oil pit. See
field report.

3615

- 3-1-93 Wn letter to RP accepting 2-17-93
PEG wp for 1 additional mw.
- 3-5 Rcv'd letter from John Gibson dated
3-2. He doesn't know what hpn to -
drum. TP say to ask PEG.
I called PEG; Dan Madsen no longer w/
PEG; he's with SEACOR. ~~DM~~ w/Steve
Krcik of PEG. 686-9780
- 3-8 JE spoke w/Dan Madsen, formerly of PEG.
They produced ~3 drums of drill cuttings
which Chevron disposed. Not aware of
any other drum.
PEG 408-441-7500 X222 S. Krick Krcik
- 3-10 Mess. frm M.M. They want to analyze soil
samples in mw borehole only IF PID
gets a hit. OK. Working on encroachment
permit for site. w/in 60 D (install mw).
When will w.o. pit ~~be~~ be excavated?
He'll ask ~~PEG~~ Touchstone. He'll take more
DTW measmts + dtmns flow drkj prior to placg
next mw. He wants to do 5 monthly ~~DTW~~ DTW
measmts, instead of 6. He'll report on next
DTW findings, + whether he'll Δ mw lky.

2-11-93 Sp w/M. Miller. Contractor will determine if they can get backhoe behind bldg. Pacific Env. is writing up for mw ^{to me} by 2-16. Overex of w.o. pit to be done early next wk. Discussed psblt of samplg dispensers. Canopy may be destroyed if we sample. "compromised"

What is the intended use of site?

2-11 mess. fm B. Turner - Adams Pt. Assoc. he knows MT was transferred, bec. he called DA's office. Wanted site update. 763-4916 MT asked BT not to correspond w/RP bec it might jeopardize his credibility.

2-17 Mess. fm C. Noma. She got my 2-4 letter. Will speak w/MCM, + prepare a response. 834-6600. Didn't get a message that I called on 12-31-92.

2-22 Sp w/M.M. Wp ^{for mw} should be here soon. Overex of w.o. pit: no dry clean fill is available. Wants to delay until they can get dry fill. Can't get proper compaction.

3615

1-22-93 Site visit. The older fence, previously just left on the ground on site, has been removed.

1-28-93 Mess. fm MT. He told Falaschi's atty that tech. ppl I handle case now, + order I b suspended unless a pbm dupl'. Gil is my contact.

2-5-93 Mess. fm M. Miller re my 1-21 letter. The 55-gal drum was found empty + removed by contractor for J. Gibson. Will document asap. Will pump + backfill big pit by 2-8. Wp for additional mws here by 2-15.

* 2-3-93 Mess fm MT. He told Robbins he'd be stepping back (not ~~resi~~ leaving), + that I (JE) wd handle the remediation. Robbins requested that I not tell Chevron's consultants - MT is no longer involved.

2-10-93 Site visit. Big pit has been back-filled!

12-22-92 Rev faxed lab results fm MW1-3
 sample. C1 + C3 (must be MW1 + MW3)
 are ND for TPH-g, BTEX, + Cl HCs.
 However, I don't have 1st pg. of Cl HCs
 for C-1. C2 (MW2?) has 640ppb TPH-g
 + 63ppb benz + 3.5ppb 1,2-DCA.

12-24 Rev'd faxed lab results for MWS.
 C2 + C3 (presumably MW2 + MW3) have
 low levels of metals. All 3 MWS are
 ND for TPH-d, TPH as oil. C-1 is ND
 for Cl HC. ~~C-2 + C-3 not NA for Cl HC.~~
~~why? what about TPH-g analysis?~~

1-5-93 Spoke w/MT.
 Soil still needs to be sampled under
 dispensers. We (JE + MM) suspect a
 dispenser and/or piping leak.

1-20-93 Reviewed ltr fm Chev. dated 1-15-93,
 Touchstone report dated 1-12-93, +
 PEG " " 1-15-93.

(Summary of recent field work).
 1-21-93 Spoke w/MT.
 Contact Gil for future work.
 Wrote letter to RP ~~trying~~ req'g field
 work w/in 30 days.

3615

12-17-92 tel con w/M.T.

If they ask, give them 30 days to submit Remediation wp. He's waiting for their atty to contact him. (to rtn his call).

12-17 Reviewed 12-17 fax fm MM w/lab results for soil fm MWS. MW2 had a hit of TPH-g (2,300 ppm) + benz (13 ppm) at 5-6.5' bgs. Same SB at 8.5-10' was ND for gas + benz. The SB ~~had~~ (no mw) has .094 ppm benz. + 3.3 ppm TPH-g at 6.5'-7'

12-18 Spoke w/M. Miller He says "There may be a ~~line~~ dispenser leak which is responsible for hit in MW2."

There was no soil sample below dispensers. He doesn't have mw results yet.

Remed. wp: scope of work:

extra step: sample under dispensers ← I suggested. MM wants to delay it until site is demolished.

Also, footings are in mid of islands.

3615

12-15-92 Spoke w/MT.
remember → "further char. of pits after removal of water."

12-16-92 Site visit. Fence is up, but site is NOT totally secure. I could get in in several areas. "Doug," ~~from~~ a contractor to PEG, was installing traffic box around MW3 at 8:30 am.

12-16-92 Spoke w/MT. He ^{has not yet} spoken w/J. Robbins, just l.m at 10 am

12-16-92 Rec'd faxed letter from M. Miller (dated 12-16) w/lab results for SP soils + pit waters. Fuel SP is clean + will be backfilled. W.oil SP is dirty + will be offhauled.
Fuel pit water is clean. W.oil pit water is dirty (170 ppb TPH-d, 70 ppb Zn). ^{MCL is 5ppm}
Pit waters to be pumped out + transported to Chevron's Richmond Terminal.
170 ppb is way below "mean value for TPH" of 1540 ppb.

12-17-92 Site visit. New fence is up. Has 2 gates on parking lot + on Bellevue. Gates were not locked, just held closed by wire. Old fence just pushed over + left on ground (+ in pits).

3615

12-14-92 Revid site safety plan

12-14 spoke w/MM. He agrees to overex + resample. When? He's waiting for lab results fm water samples. If non haz, use vac truck → Richmond Terminal (approved by RWQ (CB)). I asked for copy of "approval"; it's a "purge water" approval. Sfr of marketing "purge water". If levels are haz, then he d n know. not to do w/water.

12-15

Site visit 8:30 am. A separate contractor is installing the fence around the whole site. Pacific Environmental Group (PEG) is installing MW3 w/the limited access drill rig. (MW2's gw stabilized at 7.5', just like MW1). PEG dug SB near P1, bet. the pump islands. Sampled it at 5-6 1/2 feet bgs. Location is same as on rev. wp. Soil was green + had fuel odor (in SB).

1hr.

3615

fax 842-8252

12-14 Mess. fm M. Miller. "Drilling mws today." Pacific Env. Group (in San Jose) is ~~Miller~~ consultant.

12-14 Spoke w/MT - updated him

12-14 A w/MMiller. Wants me to fax him site map fm revised wp w/SBs -

Did he get permits for SBs? Yes

12-14 l.m. w/Zone 7 ^{ALCo} re procedures for mw permits

12-14 A w/MM. MW1+2 are going in today. MW3 is inaccessible w/the regular rig, but they may get another type of rig in there. Can't get SB2^a ^{SBI} in w/rig, so will hand auger both.

Dan Madsen - field geologist

12-14 Field visit to see install. of mws + SBs. See inspection report.

12-14 l.m. MM re w.o. pit alternatives

- 1) hand auger not poss. due to asphalt
- 2) limited access rig ~~may~~ - available?
also must remove 15 yd³ cement chunks + brush etc. (+ trench)
- 3) how bout overex + resample?

3615

12-10-92 Spoke w/MT agreement is to ~~to~~ install mws + disposition of SP at same time.
30 days. ^{the} If soil aeration will be onsite + will delay mw install, then they should have their atty contact MT.

Im MM 4:15

12-10-92 Spoke w/m Miller. He spoke w/J Robbins. They ~~could~~ ^{may be able to} install ~~the~~ mws + sample them on 24-hr. TAT.

He's amenable to the other 2 SBs, ~~no~~ but access may be limited.

Map shows that SP does not appear to be in the way.

JR ~~is~~ referred to 4-30-91 wp by Treadwell. But I was looking at

Revised wp dated 6-14-91 by Treadwell.

MM: Would sidewall samples ~~be~~ around wo tank be OK if they can't get in drill rig? I think yes, bec. one btm sample had major hit.

3615

12-10-92 Spoke w/M. Miller

1. SP was sampled ... no results yet
2. Pit waters w both sampled ... no results yet
Erickson will pump out water → ~~to~~ transport
to Chevron ~~refinery~~ ^{terminal} of treatment (Richmond)
No date set yet for water removal.
3. He OKs Treadwell's w/p
GW Tech will submit mw apps next wk.
He reads this TP as appropriate action being
~~taken~~ ^{taken} towards installing mws. He'll ask GW
Tech for an est. date of mw install.
4. Can't determine yet if an oil-water sep. exists
5. Couldn't find the 55-gal drum, as of 12-9.
He'll contact prop. owner
6. Mr. Gibson's

12-10-92 MT's USg is that mws are to be installed
& sampled by 12-16. If he disagrees, he
gd consult his lawyer.

12-10-92 I relayed this info to M. Miller ^{He is m. for atty.}
MM spoke w/NV., not atty. The SP location
prevents the install. of mws. If the
SP is located onsite, the mw instal.
wd prevent it. I said I'd speak w/
my atty.

12-3-92 Site visit to Von ³⁶¹⁵ status of fence. Met Mr. Falaschi. Gave him my card

12-3-92 Spoke w/Mark Miller. He's the contact instead of N.V. Waiting for access agreement before he can begin work.

12-10-92 Spoke w/MT. MT spoke w/J. Gibson, ^{Falaschi} atty of Chevron on 12-9, who spoke w/Chevron atty. Chevron said they'd be going out to site this wk. Chevron wants to Sport water offsite. There's been modest cleanup already. If Miller wants an extension of time, defer him to their lawyer. When is a report of findings due? I anticipate that this will be incorporated into the Remed. Wp (due 1-16-93) MT says not to mention the error on the part of Chevron atty (Robbins) to prepare an access agreement.

If he asks me for more time due to rain, tell him that his atty must speak w/MT.

Does MM have a copy of 11-17 ltr fm Robbins? Tell MM the lawyers must decide whether to continue the hearing, & to do this we'll need a summary of findings.

8-20-92

3615

Peter Brewer - attys phoned - Adams, Gibson + MacPhee
for Falaschi

Chevron took dispensers when they left.

what's our next step?

are we going to sue them?

that'd be gd bec. their insurance
covers lawsuits

indemnification clause - it's yours now
+ you're responsible.

I told P. Brewer to speak w/Mark Thomson

9-3 I phoned Mark T. to get results of their
tel con. Our options are

- 1) informal mtg
- 2) we sue them
- * 3) we issue health + safety order

We've used this provision once - to order RP to
clean up. They can appeal to RWQCB.

* he prefers #3.

wk of Sept. 21st - he'll draft th + safety order
which I'll have to sign.

If they appeal, Chevron will be the one appealing.

Mark d n q " will appeal bec. Chevron's
argument ~~is~~ wd be that they're not the RP ~~the~~.
(even tho they operated tanks) ~~due~~ bec. they sold prop.
to Falaschi.