## memo to file:

1/11/93

I spoke to Dave Comille of Unocal today. I informed him of my meeting last week with Eilean Hughes (DTSC), Rob Weston (ADDIT) and to consultants from Woodward-Clyde, the firm handling the lion's share of The state's VOC investigation in cantral S. Ceandro. During our meeting, recent VOC dismical data and gradients at the refrenced site were discussed. It was noted that a well elevations appear not to be relative to MSL, when the weel elevations are compared to uses thyward 5. Ladro 7.5 minute guals.

I asked that the wells be resurreyed this week if possible. He said he'd contact his consultant. I asked that the consultant give me a call.

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Bob Kazerian (KEI) cauled me back. After he and I discussed the MSL, I realized that data we had looked at last week with DTSC was 1990 mfo; it appears wells were resurveyed after 12/90.

Unocal 15803 E.HTM S. Ceando

12/18/92

## memo to 66:

Paul Andrews of Andrews & Assoc. called this afternoon. He indicated that Unocal now has the contract in hand waiting to be finalized for the Hamlet Apts. access agreement. He said he will sign it as soon as he gets it back from Unocal. He also said his only revision was an arbitration clause which he indicated Unocal probably didn't have any problem with.

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Unocal 15803 E. 14th St S. Leandro

## memo to file:

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12/2/92

I spoke with Mr. Faul Andrews of Andrews Associates, Mr. Andrews is the receiver for the adjoining Hamlet Apts, site while the financial matters associated with Traveloris Realtly Investment Company and Lincoln Associates are straightened out. He indicated that it had taken several weeks to get the indicated that it had taken several weeks to get the right to raccess agreement with Unocal the further said that he had planned to send the completed (2) agreement to Unocal toolog.

805

I placed a call to Unocal's Fenny Sitzer to discuss This is sue. A message was left.

12/8/92

I spoke with Dave Camile today (277-2335). He has replaced Penny Silzer on This project. We

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After receipt of the 7/25/92 letter from Lincoln Property Company's Rich Juarez, I contacted Penny Sizer of Unocal to determine the status of Unocal's attempts to gain off. site access since I issued the 9-18-92 correspondence. She said shed been in touch with centain Unocal folks who are developing the access agreements. I FAXed a copy of the LPC 9/29/82 letter to her.

I told her that it was my impression from reading the documents reflecting Unocal's interaction with Lincoln that Lincoln's demands were unveasonable.

I left a message with CPC's Rich Therez to call one bouck.

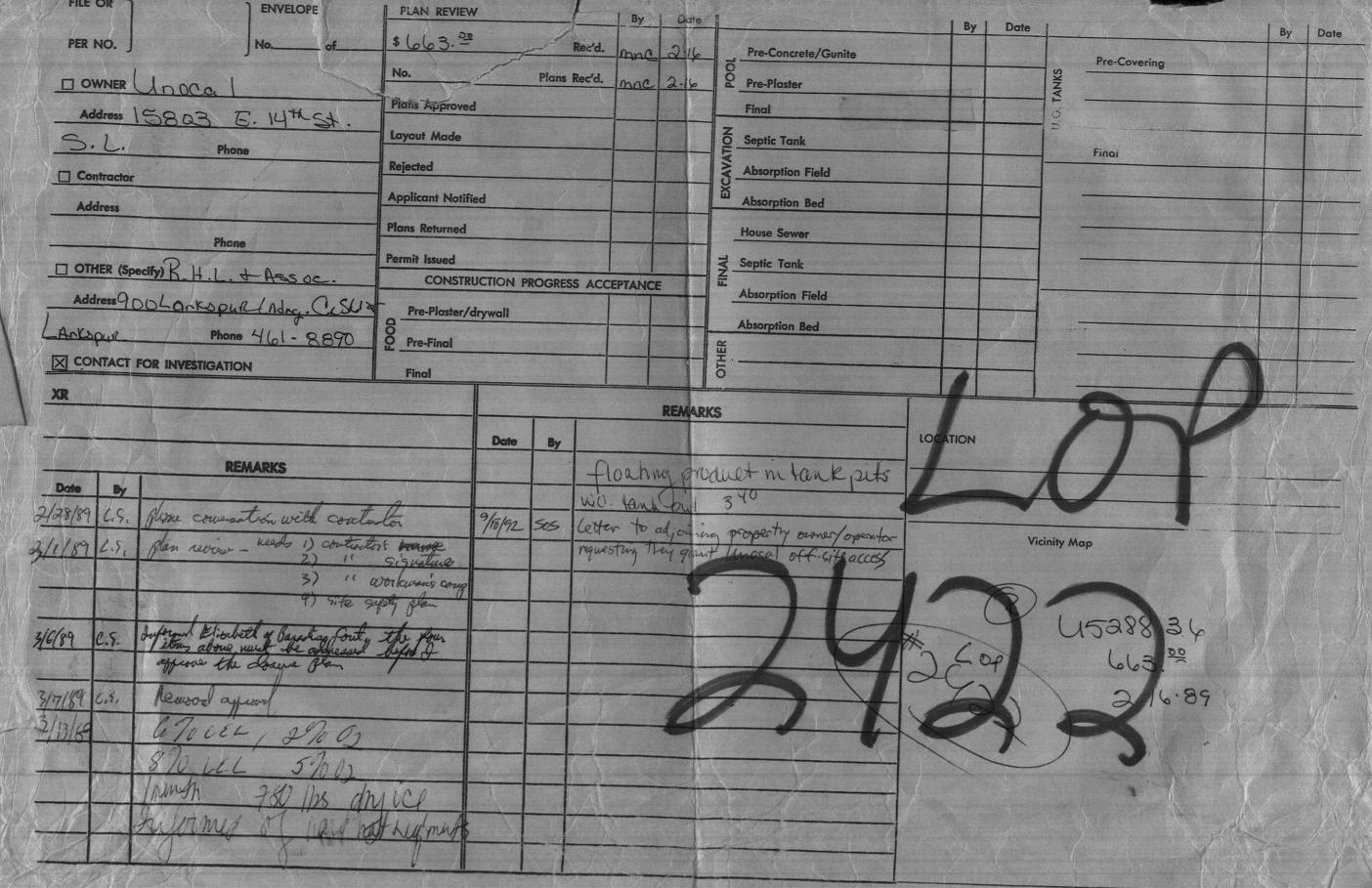
205

10/5/92 I spoke with Rick Juwez of Lincoln traperty Co.

I told him That it was my impression that LPC's conditions for approxing access were a bit onerons, and not in keeping with those standard agreenents I've seem porties neach in other cases. Farticularly discouraging was Jawez's letter of 8/27/90 in which he started access would only be granted (conditions aside) if Unocal had been required to do so by an a C/A. I advised him of the casts of lawing to do Their oran work. I also advised him that LPC, or whomever, should beek a reasonable agreement of Unocal.

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2422 MPDS Services Jarrel Crider 510.602.5120 FX.689.1918 Unocal, 15803 East 14th Street, SL 94578

Review Quarterly Monitoring Reports-dated April 28, 1995, February 1, 1995, November 8, 1994, August 3, 1994. In addition, review the Non-Attainment Area Management Plan (NAA Plan). Groundwater flow has consistently been in a northerly direction, with groundwater fluctuating from a high of 23.34' above MSL to a low of 22.40' above MSL at MW3 during the last four quarterly monitoring events. There are currently six (6) monitoring wells which have been monitored quarterly, since April of 1993. The original four wells have been monitored quarterly, since June of 1989. This site has prepared a NAA Plan for review by ACDEH.

Recommendations for the quarterly review include continued monitoring of all wells, except possibly MW6 which has been ND for the last four monitoring quarters. Wells MW1, MW-2, MW-3, MW-4 are wells which are of most concern due to detectable contamination present, with MW-1 being the well with the consitently highest detected levels of contamination. Well MW-1 has been consistently downgradient from the location of the former UST's and is also downgradient from the existing UST's. In addition, MW3 has tested at 1,100ug/L of tetrachlorethene on 1/5/95, but was not tested for VOC's this quarter, but should be tested for in future sampling events, especially in the wet season. Source of tetrachloroethene has not been identified which is consistently up-gradient of the existing and former UST's. Recommendations for the NAA Plan include showing the location of the excavated waste oil tank on the site map, and is there a monitoring well down-gradient from it. In addition, in Section 3.2.1- Selection of Constituents of Concern, tetrachloroethene is not addressed, which has been found at concentrations stated above. Containment monitoring locations are MW-5, MW-6 and one well to be placed downgradient of MW1.

Draft letter requesting an additional well downgradient of MW-1, this information is to be included in the proposed NAA Plan. Extent of contamination is not presently substantially defined for areas downgradient of MW-1. In addition, request they discontinue the sampling and monitoring for well MW-6, due to the fact that is has reported four quarters of non-detect.

8/8/95 Letter referencing NAA discussion in 1994. Called Michael Hurd of Pacific Environmental Group (PEG), Inc.[408-441-7500] to determine status of NAA plan. He informed me that Unocal was reviewing the plan and he should receive approval/comments sometime this week.

Review of quarterly report dated August 9, 1995-MPDS Services. Levels of highest detected contamination continue to be present in MW-1 (410 ppb-TPHg, 77 ppb-benzene, 7.4 ppb-ethyl benzene and 30 ppb total xylenes. Benzene was also detected in MW-2A at 3.0 ppb. Called Michael Hurd of PEG to follow-up on status of NAA plan. He informed me that the location of the additional down

gradient well location could be troublesome, due to property constraints and that siting of a previously attempted well was unsuccessful.

1/31/96 Calls to Jarred Crider of MPDS to request copies of GW monitoring reports since August 1995. He will review file and send me copies. Call to Michael Hurd of PEG to request whether the NAA plan will be submitted, or whether it is needed at all with the new "Interim Guidelines". Left message for Mr. Hurd to return my call.

2/13/96 Call from Michael Hurd of PEG concerning status of NAA plan, he stated that the plan should have been forwarded to me a long time ago, since Unocal had reviewed it in August 1995, he will try to get a copy forwarded to my attention.

2/15/96 Review MPDS "Semi-Annual Data Report"-dated February 13, 1996. This site has low concentrations of benzene (35 ppb) in source well (MW-1). This site would qualify as a "Low Risk Groundwater Case" as defined in the RWQCB "Interim Guidelines", if there was information documenting benzene concentrations downgradient of MW-1. Perhaps a hydropunch investigation to define the downgradient limits of benzene contamination in groundwater would be sufficient for case closure. Will confer with BC. BC concurred that if an additional hydropunch investigation was performed which documented that benzene contamination detected in MW-1 was not migrating off site that he would sign off on case closure. Draft letter requesting that a hydropunch investigation documenting benzene levels downgradient of MW-1 would be sufficient to close the site.

2/20/96 Initial draft of letter for BC review. Letter sent.

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2/21/96 Review Pacific Environmental Group "Non-Attainment Area Management Plan"-dated January 10, 1996.

2/22/96 Finish review of NAA plan. Comments: This plan seems to be complete, however the "Evaluation of Guidance" on Page 24 states that "Management measures and mitigation for plume areas that cross property boundaries will require a more detailed evaluation by the discharger and shall involve notification and participation by all affected property owners." as **Not Applicable to this site**. However, the plume may be migrating offsite across East 14th Street, that is why they will be installed a monitoring well downgradient of well MW-1. If this well is impacted, the extent of the contamination will not be adequately defined.

Calls from/to David Camille of Unocal. He wanted to clarify what the content of the ACHCSA letter dated 2/20/96 stated, and how Unocal could move forward towards closure of the site. I told him that instead of installing a monitoring well (and then sampling groundwater for 3 or 4 quarters), that a hydropunch investigation could be used to determine the extent of the hydrocarbon plume, and

this hydropunch investigation could also be used to determine whether any possible receptors are being exposed to any significant health risk. Also told him that the levels of perc (tetrachloroethene) in the upgradient well MW-3 were for the most part in excess of those identified in the San Leandro Plume Study, and that perc was to be considered as a constituent of concern (COC) for this site. I informed him that a risk assessment using the information obtained during the hydropunch investigation should be submitted if Unocal is to request closure for this site. We both agreed that the NAA Plan which was submitted for this site, would not be necessary, due to the recent changes in the UST Program due to SB1764 and the LLNL study. He also informed me that they were going to update the facility by installing secondary containment for the piping run and also installing overfill protection for the USTs. New dispensers would also be installed at the time of the retrofitting of the piping run. He stated that they had another site which they were having trouble obtaining off-site access, and that the owners were not cooperating (since it was a former gas station itself, they probably did not want to incur any liability if contamination was found during Unocal's off-site investigation). I asked him to send me a letter documenting this, so I could send the owners a letter requesting access from this department.

6/5/96

Review MPDS "Quarterly Data Report" -dated 5/13/96. Groundwater samples were collected on 4/8/96. Monitoring well MW1 was the only well from which petroleum hydrocarbons were detected in the groundwater sample. TPHg, BTEX, and MTBE levels were detected at concentrations of 2100, 43, 27, 7.4, 21 and 480 ppb, respectively, for the 4/8/96 sampling event. MW3 has consistently detected the highest concentrations of PCE (tetrachloroethene), and were detected at a concentration of 950 ppb for the 1/10/96 sampling event. It appears that well MW3 is the only well which is being monitored for chlorinated hydrocarbons, although concentrations of chlorinated hydrocarbons were detected in all groundwater monitoring wells. With the exception of well MW-1 (which was last sampled and analyzed for chlorinated hydrocarbons on 4/4/96), it appears that groundwater samples collected from wells MW2, MW2A, MW4, MW5 and MW6 have not been analyzed for chlorinated hydrocarbons since 1993.