

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
11-30-05

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

November 29, 2005

Ms. Shelby Lathrop
ConocoPhillips Company
76 Broadway
Sacramento, CA 95818

Henry O. Armour
Cordova Corporation
3500 Estudillo Street
San Diego, CA 92110

Ogden B. Armour
821 San Antonio Place
San Diego, CA 92106

Subject: Fuel Leak Case No. RO0000361, Unocal #7376, 4191 First Street, Pleasanton, CA

Dear Ms. Lathrop:

Alameda County Environmental Health (ACEH) staff have reviewed the fuel leak case file for the above-referenced site and the document entitled, "Revised Additional Soil and Groundwater Investigation Work Plan," dated November 21, 2005. The Work Plan proposes the advancement of cone penetrometer test (CPT) borings at three on-site and four off-site locations and based on results from the CPT borings, the installation of additional monitoring wells. ACEH concurs with the work plan provided that two of the proposed CPT boring locations are moved as discussed in the technical comment below.

ACEH requests that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities

TECHNICAL COMMENTS

1. **Proposed CPT Boring Locations.** All three of the proposed on-site CPT borings are in upgradient locations distal to the source area. We request that two of the proposed upgradient CPT locations be moved within the plume as shown on the attached figure.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- February 15, 2006 - Quarterly Report for the Fourth Quarter 2005
- April 28, 2006 - Soil and Groundwater Investigation Report

- **May 15, 2006** - Quarterly Report for the First Quarter 2006

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

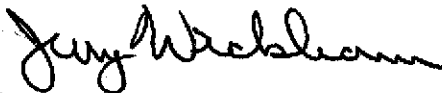
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: Revised Figure 2 - Proposed CPT Boring Locations
ACEH Electronic Report Upload (ftp) Instructions

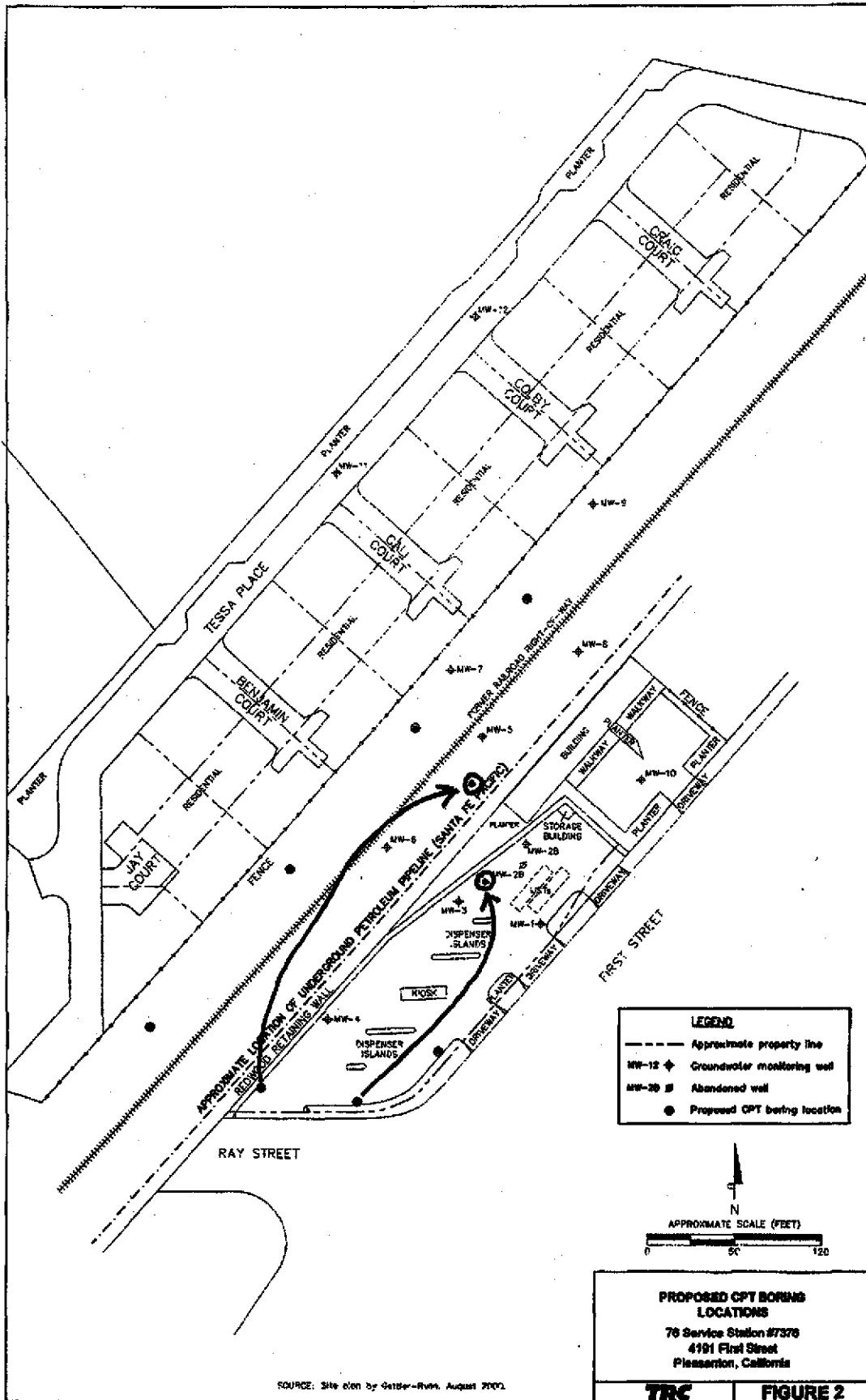
cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Keith Woodburne
TRC
1590 Solano Way, Suite A
Concord, CA 94520

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Revised Figure 2



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT
9-30-05

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

September 29, 2005

Ms. Shelby Lathrop
ConocoPhillips Company
76 Broadway
Sacramento, CA 95818

Henry O. Armour
Cordova Corporation
3500 Estudillo Street
San Diego, CA 92110

Ogden B. Armour
821 San Antonio Place
San Diego, CA 92106

Subject: Fuel Leak Case No. RO0000361, Unocal #7376, 4191 First Street, Pleasanton, CA

Dear Ms. Lathrop:

I have been assigned as case worker for the above referenced site. Please send future correspondence for this site to my attention. Alameda County Environmental Health (ACEH) staff have reviewed the fuel leak case file for the above-referenced site and the document entitled, "Additional Soil and Groundwater Investigation Work Plan," dated March 23, 2005. The Work Plan was received by ACEH on May 31, 2005. ACEH also reviewed the report entitled "Quarterly Monitoring Report, April through June 2005," dated July 14, 2005. Free product is present in the subsurface in one area of the above referenced site and off-site to the north. Dissolved fuel hydrocarbons, including the fuel oxygenate methyl tert butyl ether (MTBE), have been detected on site and off-site to the north. To date, remediation has not been conducted for the site. The Work Plan proposes the construction of four off-site monitoring wells and collection of soil and groundwater samples to characterize the lateral and vertical extent of dissolved phase fuel hydrocarbons.

Based on our review of the case file and Work Plan, we request some revisions to the work plan, which are described in the technical comments below. Therefore, we request that you address the technical comments below and submit a revised work plan to ACEH by **November 21, 2005**.

TECHNICAL COMMENTS

1. **Hydraulic Gradient.** Figure 2 of the July 14, 2005 Quarterly Monitoring Report shows an apparent groundwater mound in the area of wells MW-5 and MW-9. As a result, the figure shows an apparent hydraulic gradient from well MW-5 south toward the site (opposite the direction of apparent plume movement) and west towards a residential area. Examination of cross sections from earlier reports (Gettler-Ryan 2002), indicates that well MW-5 as well as several of the wells near MW-5 are screened within shallower intervals than the monitoring wells on site. The water levels measured in well MW-5 and the nearby wells likely represent the groundwater elevations for a shallow water-bearing or perched zone and should not be compared to groundwater elevations from the deeper wells on site. Because the

groundwater elevations on Figure 2 are from different water-bearing units, the contours shown on Figure 2 do not represent a potentiometric surface. Therefore, groundwater flow directions as drawn on Figure 2 may be misleading and should not be used for planning future groundwater investigations. Any proposed monitoring well locations based on the groundwater flow directions shown on Figure 2 of the Quarterly Monitoring Report should be re-evaluated.

2. **Shallow Water-Bearing or Perched Zones.** As discussed in comment 1 above, one or possibly more shallow water-bearing or perched zones appear to be present within the vicinity of the site. However, the extent of the zone(s) does not appear to have been fully defined. Previous subsurface investigation reports for the site have suggested that the shallow or perched zones may be discontinuous. Free product is present in well MW-5, which monitors the shallow water-bearing zone and has been observed at similar depths in several on-site borings. ACEH requests that the extent of the shallow water-bearing zones and the free product within the shallow water-bearing zone(s) be evaluated for the site. Please present plans to evaluate the extent of the shallow water-bearing or perched zone(s) in the revised Work Plan requested below.
3. **Groundwater Sampling Locations.** Please consider the collection of groundwater grab samples along transects to define the extent of dissolved fuel hydrocarbons prior to the installation of permanent monitoring wells. Present plans for grab groundwater sampling in the revised Work Plan requested below.
4. **Well Screen and Filter Pack Length.** Due to the presence of free product and elevated concentrations of dissolved fuel hydrocarbons within shallow water-bearing zone(s), ACEH is concerned with the potential for wells with long filter packs and screen intervals to act as vertical conduits for contaminant movement. Existing well screens and filter packs that are 20 to 30 feet in length may be potential vertical conduits for contaminant movement. The Work Plan currently proposes the installation of monitoring wells to a depth of approximately 95 feet below ground surface (bgs). Appendix B of the Work Plan indicates that the screened intervals will extend at least 10 feet above, and 10 to 20 feet below the water table. Given the potential to encounter multiple water-bearing zones at this site, installation of monitoring wells as proposed could potentially connect different water-bearing zones. Therefore, ACEH requests that the subsurface stratigraphy be evaluated and the presence of shallow water-bearing zones be identified prior to installation of monitoring wells. This could be accomplished by collection of continuous soil samples in pilot soil borings or cone penetrometer borings to identify potential shallow water-bearing zones and permeable zones near the water table prior to well installation. Please present your plans for selecting well screen and filter pack intervals in the revised Work Plan requested below.
5. **Chemical Analysis.** ACEH concurs with the proposed chemical analyses for all soil and groundwater samples.
6. **Site Conceptual Model.** The development of a Site Conceptual Model (SCM) for this site is encouraged in order to provide a framework for understanding the site conditions affecting the fate and transport of contaminants in the subsurface. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to

receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- d) Proposed activities to investigate and fill data gaps identified above.
- e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.

- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.
7. **Well Construction.** Please include a table of well construction details in future documents for the site. For all monitoring wells on and off-site, the well construction details table is to describe the well diameter, screen slot size, total depth of the boring, depths of the screened interval, depths of the filter pack, and other well construction details that may be relevant.
8. **Hydrogeologic Cross Sections.** Please incorporate data from the proposed and existing soil borings into one or more hydrogeologic cross sections that depict the soil layers encountered, all soil and groundwater samples collected in the borings, and analytical results for the samples. Please present the cross sections in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **November 15, 2005** – Revised Work Plan
- **February 15, 2006** - Quarterly Report for the Fourth Quarter 2005
- **120 days following ACEH Approval of Work Plan** – Soil and Groundwater Investigation Report

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

ELECTRONIC SUBMITTAL OF REPORTS

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Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

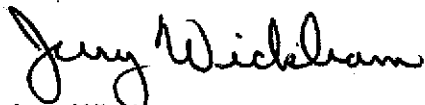
AGENCY OVERSIGHT

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Shelby Lathrop
September 29, 2005
Page 6

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Keith Woodburne
TRC
1590 Solano Way, Suite A
Concord, CA 94520

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-24-02

October 23, 2002

RO 361

Mr. David DeWitt
Phillips 66 Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

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

RE: Tosco (Unocal) Station #7376, 4191 First Street, Pleasanton - Request for Total Fuel Oxygenate Analyses

Dear Mr. DeWitt:

The case file for the referenced site was recently reviewed, up to and including the July 2002 Gettler-Ryan Inc. second quarter 2002 monitoring report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

In addition, you are reminded that all reports for this case, as well as all other Tosco / Phillips 66 cases, are to be submitted under Tosco / Phillips 66 cover that is signed, under penalty of perjury, by the official Tosco / Phillips 66 project representative.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department, 4550 East Ave., Livermore, CA 94550
Deanna Harding, Gettler-Ryan Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-03-01

20361

April 2, 2001

STID 5017

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

Mr. David B. DeWitt
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: Tosco Station #7376, 4191 First Street, Pleasanton

Dear Mr. DeWitt:

This letter is sent following my review of the March 19, 2001 Gettler-Ryan Inc. (GRI) workplan for the continued off-site assessment of the underground storage tank release from the subject site. This workplan, which proposes the installation of two monitoring wells within the housing development located northwest of the site, was sent in response to the February 8, 2001 correspondence from this office requesting such a workplan. This phase of work is intended to aid in the continued development of the *Site Conceptual Model* for this site.

The cited GRI workplan is accepted with the following clarification:

- The workplan indicates that the screens for both wells will be placed at depths of 90 - 110' below grade (BG). We understand that this screen interval is based on the expectation that groundwater (GW) will be encountered at approximately 95' BG. The expected GW depth seems consistent with the anticipated occurrence and extrapolated apparent dip of a coarse-grained sedimentary layer first encountered at a depth of approximately 55' BG in wells MW-5 and -7. This coarse-grained layer is the intended target during this phase of work. Consequently, final well screen placement should be based on field observations made during boring advancement to ensure that screens are appropriately placed across the intended horizon.

Please contact me at (510) 567-6783 when fieldwork has been scheduled.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

- c: Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department
Matt Katen, Zone 7 Water Agency
David Vossler, Gettler-Ryan Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



02-09-01

P0361

February 8, 2001

STID 5017

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

Mr. David B. DeWitt
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: Tosco Station #7376, 4191 First Street, Pleasanton

Dear Mr. DeWitt:

This letter is sent following review of the May 9, 2000 Gettler-Ryan Inc. (GRI) *Subsurface Investigation Report*, and my recent meetings with Matt Katen, Zone 7 Water Agency, and Chuck Headlee, California Regional Water Quality Control Board (RWQCB), regarding this case. This letter is also sent in follow-up to our 1/31/01 meeting in the company of David Vossler (GRI), and our site reconnaissance on 2/2/01.

As we discussed, there are several additional tasks that are necessary to move this case forward and lend a better understanding of the underlying hydrostratigraphy:

- Additional wells are necessary in the adjoining residential property to the north. During our recent site reconnaissance, several potential drilling sites were identified within this development.
- Develop cross-sections for the section line defined by wells MW-5, -6, and -8. Extend existing (or create new) cross-sections to the north that include the new wells.

Tosco is requested to explore free-phase product extraction technologies that may be employed to remove such material from well MW-5. Well MW-5 has exhibited accumulations of viscous free-phase product of up to 0.9' since June 1997. Efforts are to be expended to remove this material on a regular basis.

At this time, please submit a workplan for the referenced well installations within 60 days of the date of this letter. Please call me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department
Matt Katen, Zone 7 Water Agency
David Vossler, Gettler-Ryan Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Sent 11-16-99
Including cc's

P0361

November 16, 1999

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

STID 5017

Mr. David B. DeWitt
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: Tosco Station #7376, 4191 First Street, Pleasanton

Dear Mr. DeWitt:

This letter is sent in follow-up to my review of the case file and 1999 sampling reports for the subject Tosco site. Recent sampling data appear to demonstrate that a "recent" product release (or releases) has (have) occurred at this site.

Laboratory data for ground water samples collected from well MW-3 show a marked increase in dissolved-phase gasoline compounds beginning in March 1999. Up to 26,000 ug/l TPH-G and 3,100 ug/l benzene, among other components, were found in samples collected in March 1999 from well MW-3. In June 1999, concentrations of nearly all target compounds were curiously below laboratory detection limits in this well. The September 1999 sampling data, on the other hand, demonstrate a rebound in magnitude to concentrations similar to those of March 1999. For the two-year period preceding the 1999 sampling events, the data appeared to demonstrate the occurrence of only residual concentrations in this well. Curiously, the March and September 1999 samples exhibit "low" MtBE concentrations relative to TPH-G, for example.

Samples collected from well MW-2B, located directly downgradient of the tank cluster, do not show similar concentration trends. Samples collected from this well have for years shown relatively stable, albeit elevated, concentrations of MtBE. The remaining fuel components are typically below laboratory detection limits or at very low residual levels.

It may be that this apparent release was derived not from the tanks themselves but, rather, from the product lines and/or dispensers. The substantial depth to water and complex sedimentary geology beneath this site, however, impede simple interpretation of these sampling data. Further, if these sampling results do turn out to be evidence of a "recent" release, the relative absence of MtBE would tend to point towards a product source void of this particular additive.

Mr. David DeWitt
RE: Tosco #7376, 4191 First St., Pleasanton
November 16, 1999
Page 2 of 2

Please evaluate the integrity of the tank system at this site in whatever manner is required to reach firm conclusions. Please also review, in detail, product delivery records for this site to determine, with certainty, the sources and make-up of fuel supplied to this facility in the last 24 months.

The Livermore-Pleasanton Fire Department, the local CUPA with jurisdiction over this site, is being notified of these concerns by way of copy of this letter. I would recommend that Tosco coordinate with them regarding the issues raised in this letter should joint inspections or records audits appear warranted.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Ariu Levi, Chief, Environmental Protection, ACDEH
Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department
Matt Katen, Zone 7 Water Agency

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 8, 1999

Ms. Danielle Stefani
Livermore-Pleasanton Fire Department
4550 East Avenue
Livermore, CA 94550

ENVIRONMENTAL HEALTH SERVICES

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

RE: MtBE-impacted sites in Pleasanton

Dear Ms. Stefani:

This letter is sent in response to your 19 August 1999 request for additional information regarding Pleasanton sites that are impacted by the gasoline additive methyl tert-butyl ether, or MtBE.

Following is a brief summary for each of the petroleum release cases currently overseen by this agency where MtBE has been identified. This supplemental information adheres to the format requested in your August letter, and augments the information presented previously by this office on 22 July 1999.

UNOCAL Station, 4191 First Street (A0361)

1. *Status*

This investigation is still in progress. Additional off-site well installed 10/06/99. Additional well and boring installation on adjoining commercial property to the northeast is pending. Site access issues for off-site wells/borings have slowed progress.

2. *On-site/Off-site*

Plume extends off-site

3. *Farthest extent of contamination*

Horizontal extent: >120 feet
Vertical extent: > 80 feet

4. *Approximate level of threat based on information available to date:*

Appears to be isolated from municipal drinking water well fields based on significant geographic separation. However, Zone 7 officials interpret the depth of the impacted zone at this site as being consistent with water elevation in the main groundwater (GW) basin. This area appears to be in a recharge zone for the main GW basin.

Steve's Exxon, 2991 Hopyard Road (20362)

1. *Status*

Plume extent appears to be identified. Post-remediation monitoring in progress. Certain on-site vapor extraction wells to be destroyed, as they appear to have served as conduits for migration of shallow "perched" contamination to a slightly deeper on-site water-bearing zone. On-going joint meetings with Zone 7, City of Pleasanton Public Works, Regional Water Quality Control Board (RWQCB), Exxon, and this office to determine best locations and depths for clusters of off-site "sentinel" wells, intended to provide early warning of potential impacts to primary water-bearing zone of nearby municipal well field.

2. *On-site/Off-site*

Plume appears confined significantly on-site. Periodic low-level MtBE detection in deeper and off-site wells has raised specter of concern, however. Current vertical plume monitoring program appears to have served its purpose but now may not be adequate to assure timely data acquisition, leading to future sentinel well installation.

3. *Farthest extent of contamination*

Horizontal extent: ~100 feet (periodic)
Vertical extent: ~90 feet ?

4. *Approximate level of threat based on information available to date:*

Close to drinking water source

Shell Station, 3790 Hopyard Road (20363)

1. *Status*

On-going monitoring following yearly (2nd quarter) schedule

2. *On-site/Off-site*

Plume extends off-site

3. *Farthest extent of contamination*

Horizontal: ~180 feet
Vertical: ~18 feet

4. *Approximate level of threat based on information available to date:*
Appears isolated from drinking water source due to both geology and distance

Shell Station, 5251 Hopyard Road (20194)

1. *Status*
On-going monitoring following yearly (2nd quarter) schedule
2. *On-site/Off-site*
Plume appears to be constrained to the site
3. *Farthest extent of contamination*
Horizontal: NA
Vertical: ~ 12 feet
4. *Approximate level of threat based on information available to date:*
Isolated from drinking water source due to both geology and distance

Chevron Station, 5280 Hopyard Road (20439)

1. *Status*
On-going monitoring following quarterly schedule
2. *On-site/Off-site*
Plume appears to be substantially constrained to the site
3. *Farthest extent of contamination*
Horizontal: NA
Vertical: ~ 11 feet
4. *Approximate level of threat based on information available to date:*
Isolated from drinking water source due to both geology and distance

(Former) Exxon Station, 349 Main Street (R0506)

1. *Status*
Pending case closure
2. *On-site/Off-site*
On-site
3. *Farthest extent of contamination*
Horizontal: NA
Vertical: ~26 feet
4. *Approximate level of threat based on information available to date:*
Isolated from drinking water source due to both geology and distance

(Former) Mobil Station, 1024 Main Street (R02429)

1. *Status*
On-going soil and GW remediation and monitoring
2. *On-site/Off-site*
Plume substantially on-site
3. *Farthest extent of contamination*
Horizontal: NA
Vertical: ~44 feet
4. *Approximate level of threat based on information available to date:*
Appears isolated from drinking water source due to both geology and distance

Can-Am Plumbing, 151 Wyoming Street (R02425)

1. *Status*
Preliminary site assessment pending – workplan requested

Ms. Danielle Stefani
RE: MtBE report for Pleasanton sites
October 8, 1999
Page 5 of 5

2. *On-site/Off-site*

Unknown at this time

3. *Farthest extent of contamination*

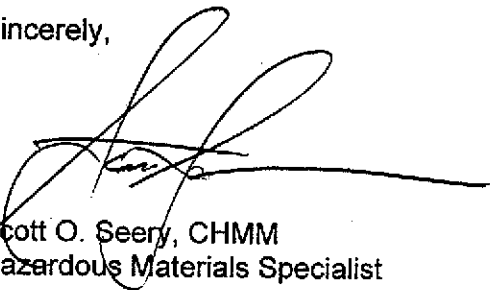
Unknown at this time

4. *Approximate level of threat based on information available to date:*

Expected to be isolated from drinking water source due to both geology and distance

I trust this supplemental report provides the additional information you were seeking. Please contact me at (510) 567-6783 should you need further assistance.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Ariu Levi, Chief, Environmental Protection
Thomas Peacock, ACDEH LOP
Chuck Headlee, RWQCB
Matt Katen, Zone 7
Steve Cusenza, City of Pleasanton, P.O. Box 520, Pleasanton, CA 94566-0802

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0361

August 13, 1999

ENVIRONMENTAL HEALTH SERVICES

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

STID 5017

Mr. David DeWitt
Tosco Marketing Company
P.O. Box 5155
San Ramon, CA 94583

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Mr. DeWitt:

Review of the May 28, 1999 Gettler-Ryan Inc. (GRI) subsurface investigation work plan has been completed. This work plan was submitted to address issues discussed during our April 20th meeting with Chuck Headlee of the California Regional Water Quality Control Board, San Francisco Bay region (RWQCB). This plan was later amended July 7, 1999 after conversations I shared with Clyde Galantine (GRI) regarding depth-discrete groundwater sampling protocols. The cited work plan proposes the installation of two (2) additional off-site monitoring wells, an additional off-site soil boring, the collection of soil samples for completion of a Risk-Based Corrective Action (RBCA) evaluation of the adjoining commercial property, and the collection of depth-discrete groundwater samples, among other proposed tasks.

The cited GRI work plan, as amended, has been accepted with the following conditions:

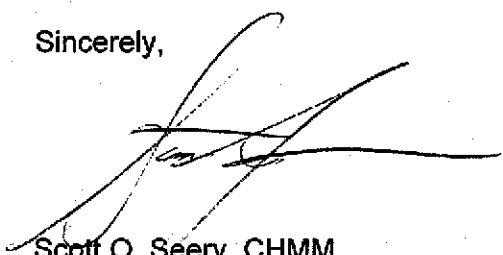
1. Both the soil boring proposed west of well MW-2B and the well planned for installation on the adjoining commercial property to the north shall be continuously cored and logged.
2. Well sampling shall occur no sooner than 24 hours following well development.
3. Vertically-discrete "grab" groundwater samples collected from the sole soil boring shall begin at the groundwater interface, and again at each additional 5' depth interval until advanced a minimum of 30' into the water-bearing zone.
4. RBCA samples should be collected from two depths, at a minimum. It is recommended, based on the lithologic log for boring B-12, that one such sample be collected within the anticipated shallow silt/clay horizon, and a second sample from the sand/gravel horizon which is expected to be encountered immediately below.

I understand that field work has been delayed from the end of August until the last week in September due to difficulties in securing off-site access and the availability of a drilling contractor. Please keep me informed of the final drilling schedule.

Mr. David De Witt
RE: 76 Station, 4191 First Street, Pleasanton
August 13, 1999
Page 2 of 2

I may be reached at (510) 567-6783 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery", written over a horizontal line.

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department
Mat Katen, Zone 7
Dave Vossler, Gettler-Ryan, Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO362, 363
194, 1151, 499,
506, 2427,
RO361, 360

July 22, 1999

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

Ms. Danielle Stefani
Livermore-Pleasanton Fire Department
4550 East Avenue
Livermore, CA 94550

RE: MtBE-impacted sites in Pleasanton

Dear Ms. Stefani:

This letter is sent in response to your recent request for an update on sites located in Pleasanton that are impacted by the gasoline additive methyl-tert butyl ether, or MtBE.

Following is a brief summary for each of the active fuel tank cases currently overseen by this agency. Please note that not all retail service station or other underground storage tank (UST) sites in Pleasanton are listed. Data for closed or otherwise inactive cases are not presented in this summary, nor are data for cases not yet managed by this office. Both the highest *historic* MtBE concentrations (and date) as well as the highest concentrations in the last 12 months are given where these data are available.

Unocal Station, 4191 First Street (RO #361)

This site was historically used for warehousing, but was developed into a retail fueling station in ~1976. Several gasoline releases were documented in the 1980's. Several phases of investigation have been completed, beginning in the late 1980's and continuing up to the present. More work is currently pending. An 8 well network is established both on- and off-site, with more wells planned.

Highest MtBE: 6200 micrograms per liter, or ug/l (6/98)
12 month high: 4800 ug/l

Shell Station, 4226 1st Street

Although a preliminary assessment of the original UST complex was completed in 1985 prior to tank replacement, the results were somewhat inconclusive due to limited project scope. Two additional phases of work occurred in 1990, the results of which, again, were somewhat inconclusive. MtBE was not sought during these prior investigations. A recent phase of assessment was performed in April 1999, and included the installation of a permanent monitoring well. The final report of this recent work is pending; however, preliminary data indicate that, although underlying groundwater has been impacted, MtBE was not identified.

Highest MtBE: <250 ug/l (4/99)
12 month high: as above

Ms. Danielle Stefani
RE: MtBE report for Pleasanton sites
July 22, 1999
Page 2 of 4

Henry Moller & Sons Meat Packing Plant, 5710 Foothill Road

A small gasoline UST was removed in 1990. Six monitoring wells were eventually installed and monitored over several years due to a release from this tank. Although underlying groundwater was impacted to some extent by gasoline compounds, MtBE was not detected (ND) above laboratory reporting limits. Potential impact to Gold Creek was also evaluated and dismissed. The site is currently under review for case closure.

Highest MtBE: ND
12 month high: "

Steve's Exxon, 2991 Hopyard Road

This site, located on the corner of Hopyard Road and Valley Avenue, appears to be the most critical release site in Pleasanton due to its close proximity to both the City's and Zone 7's well fields. There is a current network of 11 wells located both on- and off-site, including two wells (MW-5D, MW-8) which monitor deeper water bearing zones of the underlying aquifer. The data appear to demonstrate that impacts are substantially constrained to the site. Exxon operated a soil-vapor extraction (SVE) system at the site up to the early 1990s, and reinstated its use in early 1998 but with limited success so far due to water infiltration into the vapor extraction wells. A request for an additional well and modification to the SVE system has been made.

Highest MtBE: 4950 ug/l (3/99)
12 month high: same

Shell Station, 3790 Hopyard Road

An apparent release was discovered during routine monitoring of the USTs in 1987. These tanks were removed in 1988 and new tanks installed elsewhere on the site. Several phases of investigation followed with the eventual construction of 10 shallow monitoring wells, located both on- and off-site, and 3 recovery wells, installed at a time when active remediation was being considered. Nine of the monitoring wells are now sampled and monitored yearly.

Highest MtBE: 6900 ug/l (6/97)
12 month high: 1780 ug/l

Shell Station, 5251 Hopyard Road

A release was first discovered at this site in 1987 during installation of one shallow groundwater and 3 vadose zone wells intended to provide indirect monitoring of the UST system. Four additional shallow on-site wells were installed in 1989, followed by 3 more in 1990 installed in off-site locations. The fuel release appears to be substantially constrained to the site. All wells are currently monitored on a yearly schedule.

Ms. Danielle Stefani
RE: MtBE report for Pleasanton sites
July 22, 1999
Page 3 of 4

Highest MtBE: 3200 ug/l (5/97)
12 month high: 374 ug/l

Chevron Station, 5280 Hopyard Road

It has been reported that the original USTs were replaced in 1981. A gasoline release was identified during routine tank monitoring in 1989 and lead to the eventual installation of 3 shallow monitoring wells. In ~1991 the station was reconfigured and new tanks were installed in another location at the site. The three original wells were destroyed in the process and replaced. Three additional off-site wells were installed in 1997 for a total of 6 active wells.

Highest MtBE: 680 ug/l (6/96)
12 month high: 290 ug/l

(Former) Exxon Station, 349 Main Street

A release was discovered during the 1989 replacement of the original USTs at this former service station site. These replacement tanks were subsequently removed in 1993, and the site and later redeveloped. Several phases of environmental investigation followed the 1989 tank replacement, resulting in the eventual installation of 8 monitoring wells, on both on- and off-site locations, and 3 SVE wells. No active remediation occurred. Only two wells survive to this day. The site is currently being considered for closure.

Highest MtBE: 11 ug/l (6/96)
12 month high: ND

(Former) Mobil Station, 1024 Main Street

A release from the USTs was discovered during 1989 tank removals. Since that time several phases of investigation have been performed, with the eventual installation of 12 monitoring wells located both on- and off-site, and 3 groundwater and 4 SVE wells. SVE and groundwater treatment systems have operated nearly continuously at the site since 1995, with the cumulative removal of over 4000 gallons of product from the unsaturated soils and 3.9 million gallons of groundwater treatment system throughput. Although MtBE was "tentatively" identified (EPA Method 8020) in samples collected in the past from wells at the site, its presence was either not confirmed using more definitive laboratory methodologies (EPA Method 8260), or the actual concentrations were insignificant.

Highest MtBE: 1000 ug/l (Method 8020); ND (Method 8260) (8/97)
12 month high: 25 ug/l (Method 8260)

Ms. Danielle Stefani
RE: MtBE report for Pleasanton sites
July 22, 1999
Page 4 of 4

Can-Am Plumbing, 151 Wyoming Street

Although not yet a "case" overseen by this office, preliminary data collected during the June 1999 tank removals indicate up to 100,000 ug/l MtBE in shallow water within the tank pit. It is unknown if the sampled water represents true groundwater or an isolated "perched" zone. Awaiting final report and a determination of next appropriate steps in confirmation of this apparent release.

Highest MtBE: 100,000 ug/l (6/99)
12 month high: as above

I trust this report provides the information you were seeking. Please contact me at (510) 567-6783 should you need further assistance.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Thomas Peacock, ACDEH LOP
Chuck Headlee, RWQCB
Craig Mayfield, Zone 7
Steve Cusenza, City of Pleasanton, P.O. Box 520, Pleasanton, CA 94566-0802

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0361

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

May 6, 1999

STD 5017

Mr. David DeWitt
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: UNOCAL Station #7376, 4191 1st Street, Pleasanton

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. DeWitt:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 4191 1st Street, Pleasanton

May 6, 1999

Page 2 of 2

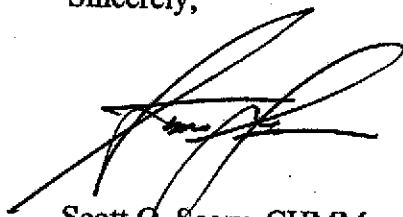
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott Q. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 361

February 18, 1999

STID 5017

Mr. David DeWitt
Tosco Marketing Company
P.O. Box 5155
San Ramon, CA 94583

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

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Mr. DeWitt:

I understand that you have taken over management of this case on behalf of Tosco. For your information, this active underground storage tank site is considered a "priority case" from the perspective of this office and that of the Zone 7 Water Agency in Pleasanton due to its location at the edge of the groundwater basin, the underlying geology, and groundwater depth. Groundwater occurs below this site (as converted to elevation above MSL) at a depth consistent with water encountered within the main groundwater basin, a concern to Zone 7. As you likely know, both Zone 7 and City of Pleasanton extract and rely on such groundwater for municipal drinking water purposes.

During June 1998, several soil borings and wells were completed both on and adjacent to this site as part of the ongoing investigation. A report documenting this work has not been presented to this office. Over 8 months have now passed since the fieldwork was completed. This concerns us.

Please see to it that this report is submitted within 15 days of the date of this letter. Please be advised that this letter constitutes an official request for technical reports pursuant to Water Code Section 13267(b) and provisions of Title 23, Article 11, California Code of Regulations.

I may be reached at (510) 567-6783 should you have any questions.

Sincerely,


Scott O. Seery CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Danielle Stefani, Livermore-Pleasanton Fire Department
Craig Mayfield, Zone 7
Dave Vossler, Gettler-Ryan, Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0361

June 10, 1998

ENVIRONMENTAL HEALTH SERVICES

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

STID 5017

TRANSMITTED VIA FACSIMILE

Ms. Tina Berry
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Ms. Berry:

Residual product was discovered in soil capillaries and coarser stringers encountered during the drilling of boring B-11 at this site. Such residual product was identified from approximately 15' below grade (BG) to final depth at around 85' BG.

Boring B-11 was drilled using a technique allowing retrieval of nearly continuous cores. Of the remaining borings at the site, only boring B-12 is slated to be drilled using this technique.

In light of the discovery of residual product in boring B-11, please instruct your consultant to drill boring B-10 using this same protocol.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Protection
Chuck Headlee, RWQCB
Chris Boykin, Livermore-Pleasanton Fire Department
Dave Vossler, Gettler-Ryan Inc.
Craig Mayfield, Zone 7

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0361

June 8, 1998

ENVIRONMENTAL HEALTH SERVICES

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

STID 5017

Ms. Tina Berry
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Ms. Berry:

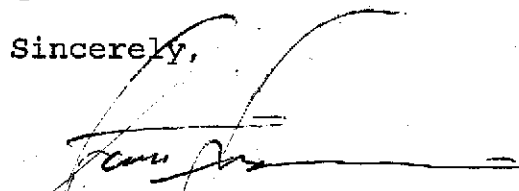
We are in receipt of the May 11, 1998 Gettler-Ryan Inc. (GRI) addendum to the previous Kaprealian Engineering Inc. (KEI) work plan dated May 6, 1997. The GRI addendum includes the addition of several soil borings (B-8 through B-12) with continuous coring of two (B-10 and -11), as well as changes to the final location and reduced number of proposed monitoring wells.

A preliminary version of the GRI addendum was amended and annotated in the field today during discussion with GRI's field geologist Clyde Galantine. A more recent version of the GRI addendum (minus the noted annotation) was received today via facsimile under signature of GRI's Stephen Carter, R.G.

The cited KEI work plan, as amended by GRI, and as annotated today, is accepted.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Protection
Chuck Headlee, RWQCB
Chris Boykin, Livermore-Pleasanton Fire Department
Dave Vossler, Gettler-Ryan Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Ro# 361

March 19, 1998

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

STID 5017

Tina Berry
Tosco Marketing Company
P.O. Box 5155
San Ramon, CA 94583

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Ms. Berry:

This letter is sent for two reasons: 1) in follow-up to our March 12, 1998 telephone conversation regarding TOSCO's response to points made in the February 9, 1998 correspondence from this office, and 2) to request a modification to the May 6, 1997 Kaprealian Engineering, Inc. (KEI) work plan for the continued assessment of the subject site.

During our January 8, 1998 meeting we discussed Entrix's forensic evaluation of the free-phase product (FP) collecting since June 1997 in well MW-5. Several issues regarding this topic were left outstanding, and were addressed in the cited February 9, 1998 correspondence from this office. As you are aware, we are still awaiting a response.

The presence of FP in well MW-5 and the anomalous appearance of "perched" ground water speaks to the complex sedimentary geology which underlies the subject site and its surroundings. The key to determining the source of the noted FP as well as the controls which affect its distribution away from that source, is in gaining a better understanding of the underlying geology.

Therefore, I will be contacting you next week to schedule a meeting with you and your environmental consultant to draft an addendum to the current KEI work plan. This addendum will focus on the "perched" water bearing zone encountered in well MW-5 and the distribution of FP. We will also talk about the other lingering issues associated with this case.

I may be reached at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Ms. Berry
RE: 4191 1st Street, Pleasanton
March 19, 1998
Page 2 of 2

cc: Mee Ling Tung, Director
Stephen Hill, RWQCB
Chris Boykin, Livermore-Pleasanton Fire Department
Craig Mayfield, Zone 7

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0#361

February 9, 1998

ENVIRONMENTAL HEALTH SERVICES

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

STID 5017

Tina Berry
Tosco Marketing Company
P.O. Box 5155
San Ramon, CA 94583

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Ms. Berry:

This letter is sent in follow-up to our January 8, 1998 meeting during which your consultant, Robert Haddad of Entrix, presented information regarding his forensic evaluation of the separate phase product reportedly collected from well MW-5 during June of 1997. As you will likely recall, several questions regarding this issue were left unanswered. In particular, the specific source(s) of the noted product has(have) yet to be identified. The subject site is still considered the primary source candidate as no other "smoking guns" have been identified.

However, Tosco was tasked during our meeting with ferreting out additional information and evidence regarding the following:

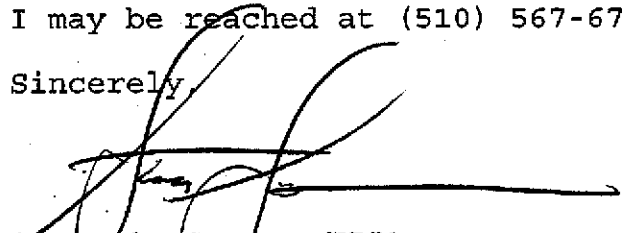
- o Tosco was to determine if product other than diesel and jet fuels, and gasoline were transported through the adjacent Santa Fe Pacific Pipeline. Tosco believed crude oil was also transported through this pipeline.
- o The Entrix evaluation was reportedly based on the chemistry of fuels produced at the Rodeo, CA refinery during the years 1988-1994. However, as it was not completely certain where the subject station derived all its fuel between 1988 and 1994 (i.e, Unocal? Chevron? ARCO? others?), this was to be determined. A forensic comparison should be completed if fuels other than Rodeo product where delivered to the site.
- o The current chemical nature of Tosco fuels was not presented. These data are important as it is currently presumed that the subject site has received Tosco-refined fuels since Tosco's 1997 acquisition of Unocal retail facilities.
- o Was MtBE present in the product evaluated by Entrix?

Ms. Berry
RE: Unocal Station #7376
February 9, 1998
Page 2 of 2

A month has now passed since our meeting. Please present these data within the next 30 days.

I may be reached at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
hazardous Materials Specialist

cc: Mee Ling Tung, Director
Stephen Hill, RWQCB
Chris Boykin, Livermore-Pleasanton Fire Department
Craig Mayfield, Zone 7

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#361

December 1, 1997
STID 5017

Ms. Tina Berry
TOSCO Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9435

RE: UNOCAL STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Ms. Berry:

During the June 1997 sampling effort at the referenced site, measurable free-phase product (FP) was reportedly identified in well MW-5, located within the proximal railroad easement. When we spoke on July 15th, you informed me that you would be sending a sample of this product to Entrix for a "fingerprinting" analysis because of a suspicion that the product was due to a leak in a petroleum pipeline located within the noted railroad easement. You informed me recently that you had not yet received the laboratory data from Entrix documenting this analysis, and that you would be contacting them regarding this. To date, we have not received any documentation regarding the product "fingerprinting" effort.

After our notification of the presence of FP in well MW-5, however, we contacted the Office of the State Fire Marshall (OSFM), Pipeline Safety Division, to inquire of the integrity of the noted petroleum pipeline. The OSFM informed this office that this pipeline (owned by Sante Fe Pacific Pipeline Partners) was examined by an internal inspection device ("smart pig") during May 1996. Apparently such pipelines are tested every 5 years. No anomalies were reportedly identified 950' upstream (northeast) and 3235' downstream (southwest) of the Unocal site. A copy of the September 9, 1997 OSFM letter report is attached.

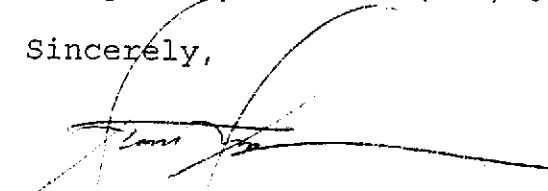
As you are aware, we have been "on-hold" for these last several months with respect to issuing approval for the May 6, 1997 Kaprealian Engineering, Inc. (KEI) off-site investigation proposal pending receipt of the "fingerprinting" data. Please submit these data forthwith.

Lastly, please provide an update to your progress in gaining encroachment access to the adjoining property (65 Ray Street et al) onto which this investigation will most likely progress. Incidentally, the developer of this adjoining property recently contracted for an accelerated soil and ground water assessment of that site, and the results are interesting. A map showing boring locations is attached. Should you care to have your consultant review these data, please call.

Ms. Berry
RE: Unocal #7376, 4191 First St., Pleasanton
December 1, 1997
Page 2 of 2

I may be reached at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

attachments

c: Mee Ling Tung, Director, Environmental Protection
Kevin Graves, RWQCB
Craig Mayfield, Zone 7
Chris Boykin, Livermore-Pleasanton Fire Dept.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#361

August 14, 1997

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

Mr. Robert. Gorham
Office of State Fire Marshall
1501 West Cameron Avenue
South Building, Ste. 250
West Covina, CA 91790

RE: Petroleum pipeline, former Southern Pacific Transportation
right-of-way, Pleasanton, Alameda County, California

Dear Mr. Gorham:

This office is currently investigating an underground storage tank (UST) release at a Unocal fueling station located at 4191 First Street, Pleasanton, California. The subject station is located directly adjacent to a former Southern Pacific Transportation rail bed. We recently discovered that an active petroleum pipeline is located within this right-of-way. The attached map illustrates the location of the station and rail bed.

Recent investigations suggest the possibility that the Unocal station is not the sole source of the discovered pollution. Wells were recently completed through the former rail bed, downgradient of the Unocal site. High concentrations of the fuel oxygenate methyl-tert butyl ether (MtBE) as well as other fuel components (e.g., benzene) have been discovered in ground water at depths up to 80' below grade. Free-phase product was discovered just last week in one of the wells installed through the rail bed.

The noted petroleum pipeline has come under suspicion as a potential contributing source of this contamination.

For your information, ground water in the Livermore - Amador Valley is used for domestic drinking water purposes. The ground water basin is managed by the Alameda County Zone 7 Water Agency. Because this site is located along the basin margin, and ground water elevations appear consistent with those measured within the main basin, Zone 7 has become alarmed that contaminants may be introduced to deeper, producing portions of the aquifer as a result of this release.

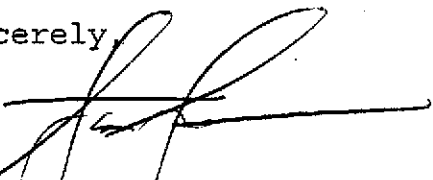
Mr. Gorham
RE: petroleum pipeline, Pleasanton
August 14, 1997
Page 2 of 2

The assistance of your office is requested in learning:

- o Whether or not this pipeline has suffered a release, both historically and more recently
- o The nature, result, and schedule for testing the pipeline for leaks
- o The range of product transferred through the pipeline
- o The owner/operator of the pipeline
- o Any other information you may feel necessary for this office to fully evaluate this issue

Please contact the undersigned at (510) 567-6783 at your earliest convenience. Thank you for your prompt response as there is a sense of urgency with this request.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

attachment

cc: Mee Ling Tung, Director, Environmental Health
Gordon Coleman, Chief, Environmental Protection Division
Tom Peacock, ACDEH LOP
Kevin Graves, RWQCB
David Lunn, Zone 7
Steve Cusenza, Pleasanton Public Works Department
Chris Boykin, Livermore-Pleasanton Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#361

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

February 20, 1996

STID 5017

Mr. Robert Boust
Unocal Corporation
P.O. Box 5155
San Ramon, CA 94583

RE: UNOCAL SERVICE STATION #7376, 4191 FIRST STREET, PLEASANTON

Dear Mr. Boust:

I have completed review of the February 12, 1996 Kaprealian Engineering, Inc. (KEI) revised soil and water investigation (SWI) work plan for the subject site, as submitted under KEI cover dated February 15, 1996. This revised SWI work plan, supplanting a previous KEI work plan dated January 12, 1996, is accepted as submitted.

Please contact me at 510/567-6783 when you have scheduled field work to begin.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director
Gil Jensen, Alameda County District Attorney's Office
Robert Weston, ACDEH
William Halvorsen, Pleasanton Fire Department
Henry O. Armour, P.O. Box 2527, Olympia, WA 98507

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Property Known As :)
Unocal Service Station #7376)
4191 First Street)
Pleasanton, California)

Notice of Official Action
By the San Francisco Bay
Regional Water Quality
Control Board

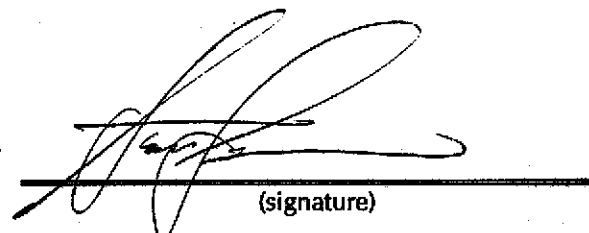
Dear Sirs:

The attached Official Notice of Request for Technical Reports pursuant to Water Code Section 13267(b) has been forwarded to this office for legal service, and oversight. As the Agency responsible for enforcing the terms of this Official Action, all communication should continue to be directed to this office. Please make arrangements to comply by calling me at (510) 567-6700 to coordinate all future activities.

Failure to comply could result in liability for civil or administrative penalties of up to \$1000 per day of delinquency.

I Scott Seery, do hereby certify that I served Ogden B. Armour, with a copy of the attached Notice of Official Action by the Regional Board by certified mailer # P 368 729 466.

Dated: 12-15-95



(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Property Known As :)	Notice of Official Action
)	By the San Francisco Bay
Unocal Service Station #7376)	Regional Water Quality
4191 First Street)	Control Board
Pleasanton, California)	

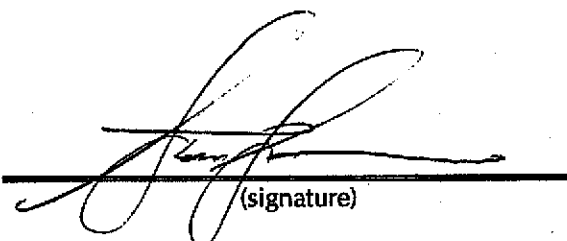
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Failure to comply could result in liability for civil or administrative penalties of up to \$1000 per day of delinquency.

I Scott Seery, do hereby certify that I served Ogden B. Armour,
Cordova Corporation, with a copy of the attached Notice of
Official Action by the Regional Board by certified mailer # P 368
729 467.

Dated: 12-15-95


(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Property Known As :)	Notice of Official Action
)	By the San Francisco Bay
Unocal Service Station #7376)	Regional Water Quality
4191 First Street)	Control Board
Pleasanton, California)	

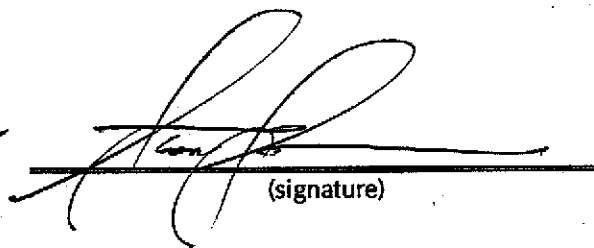
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The attached Official Notice of Request for Technical Reports pursuant to Water Code Section 13267(b) has been forwarded to this office for legal service, and oversight. As the Agency responsible for enforcing the terms of this Official Action, all communication should continue to be directed to this office. Please make arrangements to comply by calling me at (510) 567-6700 to coordinate all future activities.

Failure to comply could result in liability for civil or administrative penalties of up to \$1000 per day of delinquency.

I Scott Seery, do hereby certify that I served Henry O. Armour,
Cordova Corporation, with a copy of the attached Notice of
Official Action by the Regional Board by certified mailer # P 368
729 468.

Dated: 12-15-85


(signature)

Alameda County Health Care Services Agency, Department of Environmental Health, Environmental Protection Division

In Re The Property Known As :)	Notice of Official Action
)	By the San Francisco Bay
Unocal Service Station #7376)	Regional Water Quality
4191 First Street)	Control Board
Pleasanton, California)	
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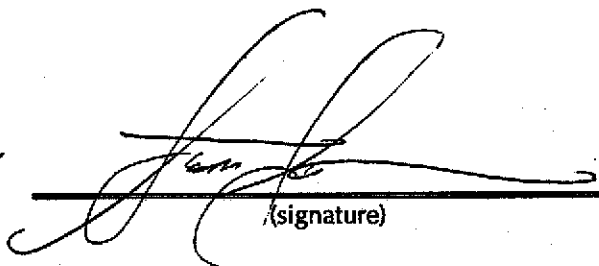
Dear Sirs:

The attached Official Notice of Request for Technical Reports pursuant to Water Code Section 13267(b) has been forwarded to this office for legal service, and oversight. As the Agency responsible for enforcing the terms of this Official Action, all communication should continue to be directed to this office. Please make arrangements to comply by calling me at (510) 567-6700 to coordinate all future activities.

Failure to comply could result in liability for civil or administrative penalties of up to \$1000 per day of delinquency.

I Scott Seery, do hereby certify that I served Robert Boust, Unocal Corporation, with a copy of the attached Notice of Official Action by the Regional Board by certified mailer # P 368 729 469.

Dated: 12-15-95



(signature)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#361
RAFAT A. SHAHID, Assistant Agency Director

STID 5017

ALAMEDA COUNTY CC4530
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

January 24, 1995

Bob Boust
Unocal Corporation
2000 Crow Canyon Pl., Ste. 200
San Ramon, CA 94583

Michael Whelan
ARCO Products Company
P.O. Box 5811
San Mateo, CA 94402

Harry O. Armour, an individual, and
dba Armour Oil Company, O.B. Armour Company, and
Successor Corporations
P.O. Box 85302
San Diego, CA 92186

Balboa Associates
P.O. Box 85302
San Diego, CA 92186

RE: UNOCAL STATION #7376, ARMOUR OIL STATION #188, ARCO STATION
#90756, 4191 FIRST STREET, ALAMEDA COUNTY, CALIFORNIA

Dear Messrs. Boust, Whelan, and Armour:

Today a Pre-Enforcement Review Panel (PERP) convened to discuss the current status of responsible party and environmental issues associated with the referenced site. Representatives from the San Francisco Bay Regional Water Quality Control Board (RWQCB), Alameda County District Attorney's Office, and the Alameda County Environmental Health Department, Environmental Protection Division, were in attendance. Also in attendance was Ms. Beth Dorris, ARCO legal council, and Mr. William Halvorsen, Pleasanton Fire Department. Absent was a representative of the former property and tank owner, Armour Oil Company and successor corporations.

As discussed, the Review Panel have agreed to allow the record to remain open for an additional period of 45 days to provide time for all parties to submit supplemental information for consideration before a final decision is rendered, or the filling of a formal action. Specifically requested is information elucidating the current business status, corporate structure, and economic standing of Armour Oil Company, all successor corporations, and principles of same.

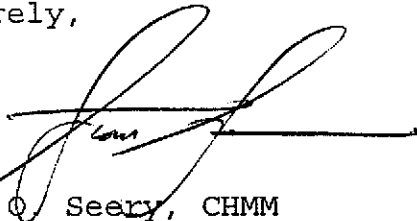
Messrs. Boust, Whelan, and Armour
RE: 4191 First Street, Pleasanton
January 24, 1995
Page 2 of 2

Therefore, the record will remain open until the close of business on Friday, March 10, 1995.

Additionally, the parties are requested to rigorously continue implementation of steps associated with the replacement of damaged well MW-2, and further site assessment.

Please contact this office should you have any questions. I may be reached at 510/567-6783.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery", written over a horizontal line.

Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Tom Peacock, ACDEH
John Kaiser, RWQCB
William Halvorsen, Pleasanton Fire Department
Beth S. Dorris, ARCO Legal, P.O. Box 2570
Los Angeles, CA 90051-0570

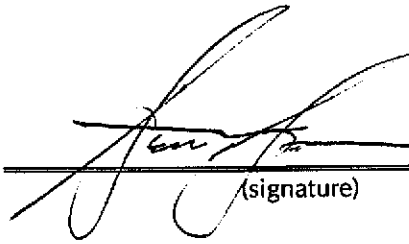
Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Properties Known As :)
)
)
Unocal Station #3771)
Armour Oil Station #188)
ARCO Station #90756)
4191 First Street)
Pleasanton, CA)

**Proof of Service of
Notice of Pre-Enforcement
Review Panel**

I Scott Seery, do hereby certify that I served Bob Boust with a copy of the
attached **Notice of Pre-Enforcement Review Panel** to convene on January 24,
1995 by certified mailer #P 386 338 408.

Dated: 12-15-94



(signature)

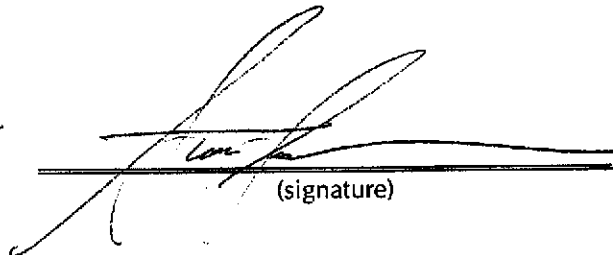
Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Properties Known As :)
)
)
Unocal Station #3771)
Armour Oil Station #188)
ARCO Station #90756)
4191 First Street)
Pleasanton, CA)

Proof of Service of
Notice of Pre-Enforcement
Review Panel

I Scott Seery, do hereby certify that I served Harry O. Armour dba O.B. Armour
Company with a copy of the attached Notice of Pre-Enforcement Review Panel to
convene on January 24, 1995 by certified mailer #P 386 338 416.

Dated: 12-15-94



(signature)

**Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division**

In Re The Properties Known As :)

**Proof of Service of
Notice of Pre-Enforcement
Review Panel**

Unocal Station #3771)

Armour Oil Station #188)

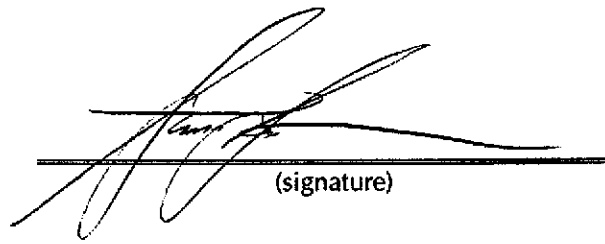
ARCO Station #90756)

4191 First Street)

Pleasanton, CA)

I **Scott Seery**, do hereby certify that I served **Balboa Associates** with a
copy of the attached **Notice of Pre-Enforcement Review Panel** to convene on
January 24, 1995 by certified mailer **#P 386 338 415.**

Dated: *12-15-94*



(signature)

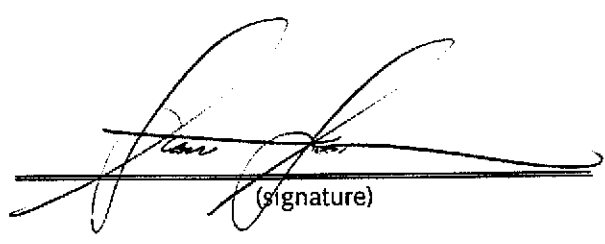
Alameda County Health Care Services Agency, Department of Environmental Health, Environmental Protection Division

In Re The Properties Known As :)
))
))
Unocal Station #3771)
Armour Oil Station #188)
ARCO Station #90756)
4191 First Street)
Pleasanton, CA)

Proof of Service of Notice of Pre-Enforcement Review Panel

I Scott Seery, do hereby certify that I served O.B. Armour Company with a copy of the attached Notice of Pre-Enforcement Review Panel to convene on January 24, 1995 by certified mailer #P 386 338 414.

Dated: 12-15-94



(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Properties Known As :)

Proof of Service of
Notice of Pre-Enforcement
Review Panel

Unocal Station #3771)

Armour Oil Station #188)

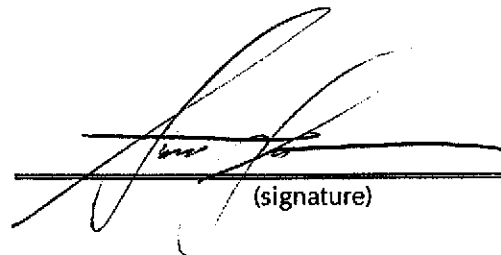
ARCO Station #90756)

4191 First Street)

Pleasanton, CA)

I Scott Seery, do hereby certify that I served Armour Oil Company and Successor Corporations with a copy of the attached Notice of Pre-Enforcement Review Panel to convene on January 24, 1995 by certified mailer #P 386 338 413.

Dated: 12-15-94



(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

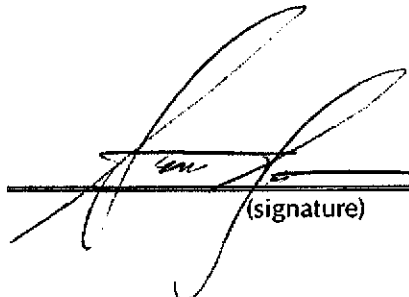
In Re The Properties Known As :)

Proof of Service of
Notice of Pre-Enforcement
Review Panel

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)
)
Unocal Station #3771)
Armour Oil Station #188)
ARCO Station #90756)
4191 First Street)
Pleasanton, CA)

I Scott Seery, do hereby certify that I served Harry O. Armour dba Armour Oil Company with a copy of the attached Notice of Pre-Enforcement Review Panel to convene on January 24, 1995 by certified mailer #P 386 338 412.

Dated: 12-15-94



(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Properties Known As :)

Proof of Service of
Notice of Pre-Enforcement
Review Panel

Unocal Station #3771)

Armour Oil Station #188)

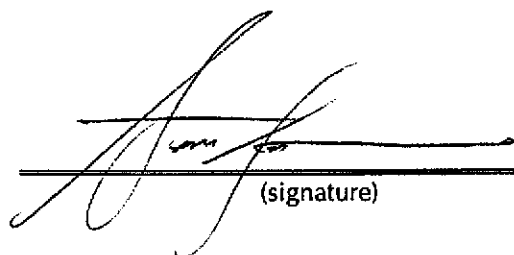
ARCO Station #90756)

4191 First Street)

Pleasanton, CA)

I Scott Seery, do hereby certify that I served Harry O. Armour with a copy of the
attached Notice of Pre-Enforcement Review Panel to convene on January 24,
1995 by certified mailer #P 386 338 410.

Dated: 12-15-94



(signature)

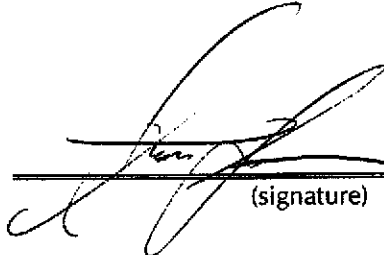
Alameda County Health Care Services Agency, Department of Environmental Health, Environmental Protection Division

In Re The Properties Known As :)
)
)
Unocal Station #3771)
Armour Oil Station #188)
ARCO Station #90756)
4191 First Street)
Pleasanton, CA)

Proof of Service of Notice of Pre-Enforcement Review Panel

I Scott Seery, do hereby certify that I served Michael Whelan with a copy of the attached Notice of Pre-Enforcement Review Panel to convene on January 24, 1995 by certified mailer #P 386 338 409.

Dated: 12-15-94



(signature)

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0361

RAFAT A. SHAHID, Assistant Agency Director

STID 5017

November 14, 1994

Harry O. Armour
O.B. Armour Company
3940 Estudillo Street
San Diego, CA 92110

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

RE: (FORMER) SAN DIEGO ARMOUR OIL COMPANY STATION, 4191 FIRST STREET, PLEASANTON, ALAMEDA COUNTY, CALIFORNIA

Dear Mr. Armour:

This office is attempting to identify responsible parties (RP) for the continued assessment and potential remediation of the referenced site pursuant to the provisions of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations. Armour Oil Company was the reported owner of the property and underground storage tanks (UST) at this site until the ownership transfer recorded February 8, 1988. Our records show that the site operated as a *Gas-N-Save* station until the early 1980's. Our records further indicate that this site subsequently operated as an ARCO station through 1987.

Several unauthorized releases were reported at the subject site between 1982 and 1985, several of which required the response of the Pleasanton Fire Department to abate. As owner of the site and USTs during this period of time, Armour Oil Company is considered a RP pursuant to the regulations. Review of the case file indicates you were personally affiliated with Armour Oil Company and this site, as both your name and signature appear in several site-specific documents (e.g, UST registration forms, etc.), as does the name "O.B. Armour."

This office requests the submittal of any information which would elucidate issues associated with the current status of Armour Oil Company, the extent of your and O.B. Armour's affiliation with same, and the arrangement between Armour Oil and ARCO Products Companies in operation of the site during the 1980's, including, but not necessarily limited to, the following:

- 1) Indicate the current status of Armour Oil Company. Provide background or other documents substantiating this reported status
- 2) Indicate your and O.B. Armour's affiliation with Armour Oil Company, including your specific job titles and responsibilities

Mr. Harry Armour
RE: 4191 First St., Pleasanton
November 14, 1994
Page 2 of 2

- 3) Indicate the connection between Armour Oil Company and O.B. Armour Company
- 4) Provide copies of the specific contract(s), including effective contract dates, conditions, and scope, etc., between Armour Oil and ARCO Products Companies for the operation of the site
- 5) Indicate whether ARCO credit cards were accepted at any time by the station operators during ARCO's affiliation with the site, and whether applications for ARCO credit cards were provided or accepted by the station operators at any time during ARCO's affiliation with the site
- 6) Indicate whether ARCO issued an operation manual or other, similar procedural guidelines while affiliated with the site

Please submit the requested and any related information to this office within the next 30 days, to the letterhead address. Should you have any questions, please contact the undersigned at 510/567-6783, or -6700.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Bill Halvorsen, Pleasanton Fire Department, Station 1
Bob Boust, Unocal

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0361

RAFAT A. SHAHID, Assistant Agency Director

STID 5017

November 14, 1994

Mr. Bob Boust
Unocal Corporation
2000 Crow Canyon Place, Ste. 200
San Ramon, CA 94583

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

RE: UNOCAL SERVICE STATION #3771, 4191 FIRST STREET, PLEASANTON

Dear Mr. Boust:

Attached please find a copy of what appears to be the bulk of the Applied GeoSystem (AGS) report (AGS 87086-3) documenting the installation and sampling of three (3) on-site monitoring wells. This report was located by Mr. John Lane of RESNA in computer archives maintained in their Fremont office. You may recall that RESNA purchased AGS several years ago, hence the availability of these records.

As I indicated in my phone message to you today, this report, however incomplete, documents the apparent severity of the release at this site. Fuel contaminants in concentrations as high as 390 parts per million (ppm) of total petroleum hydrocarbons characterized as gasoline (TPH-G) were discovered in soil encountered as deep as 55 feet below grade (BG). Water sampled from the completed wells exhibited up 24,000 parts per billion (ppb) of TPH-G and 2600 ppb benzene.

Ground water elevations in the subject wells are comparable to reported well screen intervals and water elevations of nearby (apparent) municipal or domestic wells cataloged by the Alameda County Flood Control and Water Conservation District, Zone 7. This site is clearly located in a potentially sensitive area.

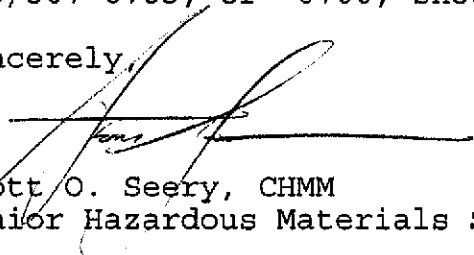
Assessment must resume forthwith at this site. Therefore, please arrange to have your environmental consultant(s) mobilize to determine the current condition of the monitoring wells, and redevelop them as needed. Wells are to be surveyed to an established benchmark to an accuracy of 0.01 foot, with values converted to elevations relative to mean sea level (MSL). Water elevation measurements and purging/sampling shall occur no sooner than 24 hours following development, where applicable.

You should begin the development of a soil and water investigation (SWI) and corrective action plan (CAP), pursuant to provisions of Article 11, Title 23, California Code of Regulations, at this time. Because of the unfortunate time lapse in completing this work, continued assessment of the site will require an accelerated schedule of implementation for each task.

Mr. Bob Boust
RE: 4191 First St., Pleasanton
November 15, 1994
Page 2 of 2

Please plan to schedule the field work cited above within the next 2-3 weeks, or sooner if possible. You may contact me at 510/567-6783, or -6700, should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachment

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Craig Mayfield, Zone 7
Bill Halvorsen, Pleasanton Fire Department, Station 1
Michael Whelan, ARCO Products Company

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0361

RAFAT A. SHAHID, Assistant Agency Director

STID 5017

November 11, 1994

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

Mr. Michael Whelan
ARCO Products Company
P.O. Box 5811
San Mateo, CA 94402

RE: UNOCAL SERVICE STATION #3771, 4191 FIRST STREET, PLEASANTON

Dear Mr. Whelan:

I am in receipt of your correspondence dated October 27, 1994. Your letter explains that ARCO's research of the subject site revealed that the subject facility was an ARCO contract dealer account (CDA). You report that San Diego Armour Oil Company (SDAOC) reportedly signed an ARCO Petroleum Products Company (APPC) "38-A" contract. A copy of the reported contract record between ARCO Products Company and SDAOC for the time frame spanning October 16, 1984 to November 1, 1987 was attached to your correspondence. You indicate that under a CDA arrangement, ARCO simply maintained a product supply contract and "allowed" the dealer to place ARCO signs at the facility.

Your letter concludes by indicating that, because ARCO had no ownership or leasehold interest in the subject site, nor in the tanks, ARCO's affiliation with the site would not be such that ARCO would meet any of the four responsible party (RP) criteria pursuant to Section 2720 of Article 11, Title 23, California Code of Regulations. ARCO consequently requests Alameda County remove them from the list of named RPs for this site.

As we discussed yesterday and during a previous conversation, records made available to this office by the Pleasanton Fire Department indicate that there was an apparent ARCO affiliation at the site which predates the reported contract initiation date between ARCO and SDAOC. To illustrate this point, records of unauthorized releases at the site were provided to you under cover dated November 1, 1994. You will likely recall from your review of these data that five unauthorized releases were reported at the site between 1982 and 1985. This facility was identified as an ARCO station during three of the five reported events, one of which, occurring February 20, 1994, predates ARCO's apparent contract with SDAOC by approximately 8 months.

Mr. Whelan
RE: 4191 First St., Pleasanton
November 10, 1994
Page 2 of 2

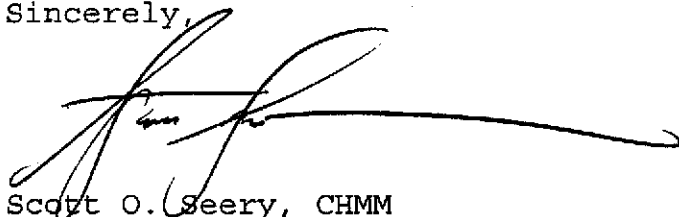
As we discussed yesterday, Hazardous Materials Business Plan (HMMP) records from the Pleasanton Fire Department files indicate the site was, again, identified as an ARCO station prior to the reported SDAOC contract initiation date. Hence, this office is unclear just what the arrangement was between ARCO and SDAOC during and prior to the reported CDA contract dates. Copies of the cited HMMP records are attached to this letter for your information.

In order to aid this department in appropriately evaluating ARCO's request for removal from the RP list for this site, we request the submittal of the following information:

- 1) A copy of the specific, complete contract(s) between ARCO and SDAOC for the entire period during which ARCO had any affiliation with the subject site
- 2) Did ARCO issue an operations manual or other, similar procedural guidelines while affiliated with the site?
- 3) Were ARCO credit cards accepted at any time by the station operators during ARCO's affiliation with the site? Were applications for ARCO credit cards provided or accepted by the station operators at any time during ARCO's affiliation with the site?

Please submit the requested information as soon as it is made available to you, preferably within the next 30 days. I may be reached at 510/567-6783, or -6700, should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachment

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Bill Halvorsen, Pleasanton Fire Department, Station 1
Bob Boust, Unocal

Alameda County Health Care Services Agency,
 Department of Environmental Health,
 Division of Environmental Protection

In Re The Properties Known As:)	Notice of
)	Pre-Enforcement
)	Review Panel
<u>Unocal Station #3771</u>)	
<u>Armour Oil Station #188</u>)	
<u>ARCO Station #90756</u>)	
<u>4191 First Street</u>)	
<u>Pleasanton, CA</u>)	

Notice is hereby given that upon the motion of the Alameda County Environmental Protection Division, and the San Francisco Bay Regional Water Quality Control Board a further hearing of the **Review Panel** will convene on January 24, 1995 at 10:30 a.m. in the offices of the Alameda County Hazardous Materials Division, located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94502. This further hearing of the **Review Panel** will reconvene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above locations.

Information and supporting documents which substantially illustrate the contractual relationship between ARCO Products and Armour Oil Companies, the specific levels of control and operation of the subject station by each, as well as documents which clearly identify the current corporate status of Armour Oil Company and successor corporations, must be presented to the Panel.

The Alameda County Environmental Protection 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. Bob Boust
UNOCAL CORPORATION
2000 Crow Canyon Pl., Ste. 200
San Ramon, CA 94583 | 2. Michael Whelan
ARCO Products Company
P.O. Box 5811
San Mateo, CA 94402 |
|--|---|

Pre-Enforcement Review Panel notice
December 15, 1994
Page 2 of 2

- | | |
|--|---|
| <p>3. Harry O. Armour, an individual
3940 Estudillo Street
San Diego, CA 92110</p> <p>5. Harry O. Armour
dba ARMOUR OIL COMPANY
3940 Estudillo Street
San Diego, CA 92110</p> <p>7. O.B. ARMOUR COMPANY
3940 Estudillo Street
San Diego, CA 92110</p> | <p>4. Harry O. Armour
dba O.B. ARMOUR COMPANY
3940 Estudillo Street
San Diego, CA 92110</p> <p>6. ARMOUR OIL COMPANY and
Successor Corporations
3940 Estudillo Street
San Diego, CA 92110</p> <p>8. BALBOA ASSOCIATES
P.O. Box 85302
San Diego, CA 92186</p> |
|--|---|

Dated: December 15, 1994

(signature)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0361

STID 5017

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

November 1, 1994

Mr. Michael Whelan
ARCO Products Company
P.O. Box 5811
San Mateo, CA 94402

RE: UNOCAL SERVICE STATION #3771, 4191 FIRST STREET, PLEASANTON

Dear Mr. Whelan:

As we discussed today, please find attached a copy of a data package sent previously by the Pleasanton Fire Department to Bob Perez of Bob Perez Adjusters, Inc. This package presents information regarding all the releases known at the time which occurred at the site during the early to mid 1980s. Please note that at least one release occurred prior to the reported date of the contract between ARCO and Armour Oil Company, yet the site was already identified as an ARCO station.

Please contact me at 510/567-6783, or -6700, when you have had the chance to look into this issue.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachments

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Scott Deaver, Pleasanton Fire Department, Station 1
Bob Boust, Unocal

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0361

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH

STID 5017

Environmental Protection Division
Local Oversight Program
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700

October 20, 1994

Mr. Michael Whelan
ARCO Products Company
P.O. Box 5811
San Mateo, CA 94402

RE: UNOCAL SERVICE STATION #3771, 4191 FIRST STREET, PLEASANTON

Dear Mr. Whelan:

As you have become aware, ARCO Products Company has been named as a responsible party with respect to the unauthorized releases at the referenced site, pursuant to provisions set forth under Article 11, Title 23, California Code of Regulations. Our records show that this site was operated as an ARCO station during the 1980's. During ARCO's tenure at the site, at least three unauthorized releases were reported.

Applied GeoSystems (AGS) performed several phases of environmental investigation at the site beginning in 1987, first under contract with Unocal, followed by work contracted by Armour Oil Company of San Diego, the reported owner of the site at that time. The underground storage tank (UST) system was replaced prior to Unocal's purchase of the site in 1988.

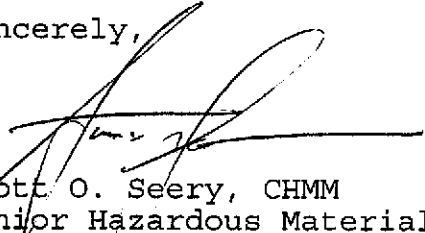
This office is aware that several soil borings were advanced by AGS. We are also aware that one or more ground water monitoring wells are present at the site. Unfortunately, neither this agency, the city of Pleasanton, the San Francisco Bay Regional Water Quality Control Board (RWQCB), nor Unocal are in receipt of any reports since the submittal of the October 22, 1987 AGS work plan which proposes the referenced well installations.

Armour Oil Company is reportedly defunct since filing for bankruptcy some years ago. Therefore, we are requesting that ARCO research their files for any reports or other viable technical documents which may supplement the current case file. Should any pertinent documents be discovered, we request copies of these be sent to this office within 30 days, as we are attempting to quickly get this project on track and minimize the potential for having to repeat work which may already have been completed.

Mr. Michael Whelan
RE: 4191 First Street, Pleasanton
October 20, 1994
Page 2 of 2

Please contact me at 510/567-6783, or -6700, should you care to discuss this issue.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Tom Peacock, ACDEH LOP
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Scott Deaver, Pleasanton Fire Department, Station 1
Bob Boust, Unocal

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

R0361

STID 5017

October 11, 1994

Mr. Bob Boust
Unocal Corporation
2000 Crow Canyon Place, Ste. 200
San Ramon, CA 94583

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

RE: UNOCAL SERVICE STATION #3771, 4191 FIRST STREET, PLEASANTON

Dear Mr. Boust:

As we discussed October 7, agency oversight responsibility for the environmental investigation at the referenced site has been delegated to Alameda County Environmental Health Department's Local Oversight Program (LOP) at the request of the city of Pleasanton. I have just completed a review of the case file made available to this office by the Pleasanton Fire Department. This review indicates the case file appears incomplete.

Please forward copies of all reports documenting past, present, and future investigations or clean-ups at this site. More specifically, we need all reports issued since September 1987, as well as the report documenting the results of tank closures and replacement just prior to Unocal's purchase of the site in 1988.

Please submit these data as soon as you are able. Only upon our review of these documents can we render an informed decision regarding the appropriateness of any proposed corrective actions at the site. Such may impact your schedule for completion of site rebuilding activities.

Please contact me at 510/567-6783, or -6700, should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Tom Peacock, ACDEH LOP
Gil Jensen, Alameda County District Attorney's Office
Scott Deaver, Pleasanton Fire Department, Station 1
Michael Whelan, ARCO Products Company