

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

April 3, 2003

Mr. Gene Ortega ExxonMobil Oil Company 2300 Clayton Road, Suite 250 Concord, CA 94520

Dear Mr. Ortega:

Subject: Wong's Exxon, R00000390, 2200 E.12th St.Oakland

CA 94606

Hi Paula:

I have reviewed the files regarding the above referenced site. I have also left a message for your consultant approving ERI's Corrective Action Plan Addendum (CAP Addendum) concerning the above referenced site dated February 14 2003. Per my phone call regarding ERI's Corrective Action Plan Addendum (CAP Addendum) for Former Exxon Service Station located at 2200 East 12th Street, Oakland, California, dated February 14, 2003, has been approved. You may proceed with the permitting process necessary to install wells DPE1 through DPE4.

Please call me at (510) 567-6876 if you have any questions.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C:Ms. Paula Sime, ERI, 73 Digital Drive, Suite 100, Novato CA 94949-5791

D. Drogos, A. Gholami





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ENVIRONMENTAL PROTECTION

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

1131 Harbor Bay Parkway, Suite 250

ENVIRONMENTAL HEALTH SERVICES

DAVID J. KEARS, Agency Director

June 3, 2002

Mr. Gene Ortega ExxonMobil Oil Company 2300 Clayton Road, Suite 250 Concord, CA 94520

Dear Mr. Ortega:

Subject: Fuel Leak Site No. RO0000390, 2200 E. 12th St., Oakland CA 94606

Alameda County Environmental Health, Local Oversight Program (LOP), has recently reviewed the files for the referenced site up to and including the May 24, 2002 Second Quarter 2002 Monitoring Report and determined that additional information is needed to progress this case to closure. Please address the following technical comments.

Technical Comments

1. It appears that our office has not responded to the Dual-Phase Extraction Feasibility Test Report and Conceptual Corrective Action Plan dated 9/19/01, therefore, this letter formally approves the recommended CAP. This includes the over-drilling of MW9B, MW9C and MW9I and the installation of DPE wells within these wells in addition to DPE1.

2. Your May 24, 2002 report states that the DPE system installation is planned for 2003. Because of the consistent elevated TPHg and MTBE at this site, our office requests that until the DPE system is installed, regular (monthly?) DPE from a mobile treatment unit should be performed from the highly impacted on-site wells.

 Please run EPA Method 8260 more frequently on impacted wells to confirm the presence of MTBE. There is not enough confirmation analytical data to state the accuracy of concentrations currently being reported by EPA Method 8021. In addition, please run the impacted wells for the following EPA Method 8260 analytes: TAME, ETBE, DIPE, TBA, EDB and EDC.

4. As noted in the May 24, 2002 report, since changing analytical laboratories, significant changes in reported TPHg and MTBE concentrations have been observed. Please clarify the way these analytes are quantified by the laboratory and explain the recent trends observed in both TPHg and MTBE.

Please provide your response to these technical comments in your Third Quarter 2002 Monitoring Report, which should be submitted no later than August 30, 2002.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

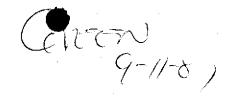
C: B. Chan, files

Ms. Paula Sime, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791

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AGENCY





DAVID J. KEARS, Agency Director

September 10, 2001 StID #245/ RO0000390

Mr. Gene Ortega Exxon-Mobil Environmental Remediation 2300 Clayton Road, Suite 1250 P.O. Box 4032 Concord, CA 94524-4032 ENVIRONMENTAL HEALTH SERVICES

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

Re: Environmental Investigation at Former Exxon RAS #7-0238, 2200 E. 12th St., Oakland CA 94606

Dear Mr. Ortega:

Our office has received and reviewed the September 6, 2001 Quarterly Groundwater Monitoring Report, Third Quarter 2001 for the referenced service station. Consistent with past monitoring results, elevated MTBE concentrations in groundwater continue to persist. As you may be aware, our office met with Mr. Darin Rouse regarding this site in March 2000 to address this issue. In addition, we clarified the minimum Title 23 reporting requirements for technical reports. Exxon-Mobil proposed groundwater extraction from several of the wells and the later in October 2000 submitted a work plan to perform a dual-phase extraction test. This work was approved and in January 2001 two vapor points were installed for this test. In addition, a site conceptual model (SCM) was requested in the March 2000 meeting.

At this time, our office requests the following action/information:

- No changes in your monitoring reports have been observed. Please incorporate in all future monitoring reports, past and future actions that have or are scheduled for the site. An interpretation of the monitoring results should be provided as well as a recommendation for future actions.
- What is the status of groundwater extraction from site wells? How much if any groundwater has been removed from the monitoring wells and what frequency is it being removed?
- What is the status of the dual-phase extraction test and when will our office receive a technical report? What is/are your recommended remediation?
- When will the Site Conceptual Model (including recommendations) be submitted?

Please respond to this letter in writing within 30 days or no later than October 12, 2001. You may contact me at (510) 567-6765 if you have any questions.

Sincerely.

Barrey M. Chan

Hazardous Materials Specialist

C: B. Chan, files

Mr. S. Thompson, 73 Digital Drive, Suite 100, Novato, CA 94949-5791

Req2200E12thSt

AGENCY

DAVID J. KEARS, Agency Director



RO# 390

ENVIRONMENTAL HEALTH SERVICES

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

October 16, 2000 StID # 245

Mr. Darin Rouse
ExxonMobil-Environmental Remediation
2300 Clayton Road, Suite 1250
P.O. Box 4032
Concord, CA 94524-4032

Re: Work Plan for Dual-Phase Extraction Pilot Test at 2200 E. 12th St., Oakland CA 94606

Dear Mr. Rouse:

Our office has received and reviewed the October 2, 2000 work plan referenced above as prepared by Environmental Resolutions, Inc., (ERI), your consultant. This work plan proposes to install two vapor points VP1 and VP2 to be used as observation wells and to use wells MW9B, MW9C and well MW9I as extraction wells. Using a liquid-ring pump both fluids and vapor will be extracted separately or combined from these wells. A five day test is proposed from which vacuum radius of influence, groundwater capture zone, groundwater draw-down, optimal flow rates, appropriate abatement method and estimated petroleum removal rate may be determined.

This work plan is approved. It is assumed that either or both of these extraction methods will be the recommended remediation approach, even though a formal feasibility study for the site has not yet been done. In the event that this process is not successful, please provide an alternative corrective action plan.

During the extraction test, the vapor stream is proposed to be monitored by a PID instrument. Please use a FID instrument, since the main contaminant, MTBE, response to FID is much greater than to a PID instrument.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. J. Chappel, ERI, 73 Digital Driv, Suite 100, Novato CA 94949-5791

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HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

RO#390

August 30, 2000 StID # 245

Mr. Darin Rouse
ExxonMobil - Environmental Remediation
2300 Clayton Road, Suite 1250
P.O. Box 4032
Concord, CA 94524-4032

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

Re: Former Exxon RAS #7-0238, 2200 E. 12th St., Oakland CA 94606

Dear Mr. Rouse:

Our office has received and reviewed the second and third quarter 2000 groundwater monitoring reports for the above referenced site. As you may recall, this site has experienced a significant MTBE release, which is the main chemical of concern. There is also indication that the MTBE plume has migrated off-site. Concentrations up to 44,000 ppb MTBE were reported in MW9C in the 7/00 monitoring event. Elevated concentrations have been detected in this well since the beginning of testing the wells for MTBE, 3/98. These concentrations will require remediation to remove the MTBE source as recommended in the SWRCB's final draft of the Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates.

In the second quarter groundwater monitoring report, you stated that a site conceptual model (SCM) is being developed for this site. In addition, you stated that ERI had submitted a groundwater discharge permit for feasibility testing, which was to be implemented during the third quarter. In the third quarter report, you stated that the dual-phase pilot test is scheduled for October 2000. I have since spoke with Mr. James Chappell of ERI. My concern is that our office has not been notified of the details of the proposed dual-phase pilot test. A Corrective Action Plan (CAP) or Feasibility Study (FS) has never been provided. It was assumed that this information would be incorporated into your SCM. Mr. Chappell was not certain on the details of the pilot test, therefore, I am requesting the submittal of your work plan for the dual-phase pilot test. You should also provide your rationale for selecting this remediation approach.

Please submit your work plan to our office within 30 days or no later than October 2, 2000.

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

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

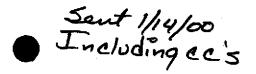
C: B. Chan, files

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

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ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577

(510) 567-6700 (510) 337-9432

January 14, 2000 StID #245

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

Re: Exxon Station #7-0238, 2200 E. 12th St., Oakland CA 94606

Dear Mr. Rouse:

Our office has received and reviewed the January 5, 2000 Fourth Quarter 1999 monitoring report for the above site as prepared by your consultant, Environmental Resolutions, Inc. My first impression with these results is the significant decrease in MTBE concentration in the majority of wells. Since MTBE is known to be recalcitrant to natural bio-degradation, it is not clear what is the cause for this decrease.

This observation leads to our office's request for your monitoring reports to be more comprehensive. The report should be much more than a cover letter attached to your consultant's report. Perhaps you may need to instruct your consultant to address my concerns, rather than submitting a cover letter attached to the sampler's report. Nevertheless, your monitoring reports, in accordance with Title 23, Section 2652 of the Underground Storage Tank Regulations, should include the following:

- There must be an update on the remedial actions to date
- You should describe what actions were done during the past quarter.
- Describe what will be done during the next quarter

In addition, the report should also include a brief site history, an interpretation of the results including plots of concentrations over time and vs groundwater elevation, plots of bio-indicator parameters, groundwater gradient maps with equipotential lines and a sampling data sheet for each well with pH, purge volume, conductivity, temperature and physical observations. Of importance is your interpretation of results, which may help in determining what remedial approach will be selected.

I am also aware that your consultant is working on a Site Conceptual Model (SCM), a requirement for MTBE impacted sites such as this. Your reports should also give an update on the status of your SCM.

Please modify your future reports to reflect these requirements. You may contact me at (510) 567-6765 if you have any questions.

Mr. Darin Rouse Exxon Station 7-0238 2200 E. 12th St., Oakland CA 94606 StID #245 January 14, 2000 Page 2.

Sincerely,

Barney M. Chan Hazardous Maria Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Chappel, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791 2200e12

HEALTH CARE SERVICES

AGENCY





RO# 390

April 23, 1999 StID # 2116 245

Mr. Stanley Wong 2200 E. 12th St. Oakland CA 94606

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

Re: Remedial Action Plan for 2200 E. 12th St., Oakland CA 94606

Dear Mr. Wong:

Our office has received and reviewed the April 5, 1999 Remedial Action Plan prepared by Tank Protect Engineering (TPE) and find that its contents are unacceptable. This work plan merely restates the conversation I had with TPE. As mentioned in the TPE work plan, our office requested that active remediation be used at this site since there has been little reduction of the petroleum concentration in groundwater even after the excavation of a large amount of contaminated soil.

TPE's original October 20, 1997 work plan proposed enhanced bio-remediation through the addition of hydrogen peroxide or other oxygen releasing compound. Nutrients, microbes and surfactants could also be added. Our office approved of this approach. The specifics of the work plan were to be submitted in the future. Based on the initial results of the addition of supplements into a remedial well, an expanded well network could be designed. My March 11, 1999 letter requested that a formal work plan for enhanced bio-remediation be submitted by April 26, 1999.

In a conversation with TPE, I mentioned that dual phase extraction has been used at sites such as this, that is, sites with free product, sheen and/or high dissolved petroleum contamination. The recent April 5, 1999 Remedial Action Plan submitted reflects these comments.

At this time, please have your consultant review the previously proposed remedial action plan and compare this with, at a minimum, the proposed in the April 5, 1999 work plan. This amounts to a review of the original feasibility study. Whichever remediation recommended, please provide a detailed description of the remediation system's design. This should include such items as:

- number and location of any additional wells,
- a diagram of the piping system,
- the amounts and type of supplements to be added.
- the method used for adding the supplements.
- how the system will be monitored.
- types of chemical analysis used to monitor system.
- wells which will be extracted,
- an estimation of the amount of material removed.
- method for the disposal or destruction of contaminants
- permit requirements
- tentative schedule for the work etc.

Mr. Stanley Wong 2200 E. 12th St., Oakland 94606 StID # 2116 April 23, 1999 Page 2.

Please provide an acceptable work plan to our office within 30 days or by May 24, 1999

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587-1233 2wprq2345E14

HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director

RO# 390

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

February 24, 1999 StID # 245

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

Re: Exxon RAS 7-0238, 2200 E.12th St., Oakland CA 94606

Dear Ms. Guensler:

Our office has received and reviewed the January 28, 1999 Fourth Quarter 1998 groundwater monitoring report for the above site as prepared by Environmental Resolutions, Inc. The results of this monitoring event reveal the consistent presence of elevated MTBE in wells MW9B, MW9C and MW9I. Historical monitoring data indicates that this release occurred on approximately March or April 1998. These results also indicate that unlike typical petroleum hydrocarbons, natural attenuation is not observed.

For sites such as this, with elevated MTBE concentration in the absence of elevated gasoline, our office requests the following actions:

- Determination of the extent of the MTBE plume
- Determination if any preferential pathways exist
- Verification of the absence of a current leak condition in the UST system
 Please provide a response to these requirements in your next monitoring report.

Secondly, as you are aware, without some type of remediation of current conditions, no improvement of groundwater conditions is expected. Long term monitoring in some fashion would be required for this site. Given this scenario, please confirm if Exxon is committed to this or is willing to expedite closure by performing active remediation.

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

Sincerely.

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. M. Dockum, ERI, 74 Digital Drive, Suite 6, Novato, CA 94949

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Ro# 390

ENVIRONMENTAL HEALTH SERVICES

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

September 21, 1998 StID # 245

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

Re: Exxon RAS #7-0238, 2200 E. 12th St., Oakland CA 94601

Dear Ms. Guensler:

I have received and reviewed the September 2, 1998 Quarterly Monitoring report for the above site. It was noticed that the items mentioned in my prior, July 2, 1998 letter, were not addressed. I have enclosed a copy of this letter for your reference. Specifically, our office remains concerned about the elevated levels of MTBE found in the majority of on-site wells. My prior letter requested that you monitor both the offsite and on-site wells, evaluate potential remediation approaches for the MTBE plume and make every effort to determine its source. The need to determine off-site plume migration is critical to determining if further site characterization or active remediation is required.

Please respond to these items prior to and include your response in the next groundwater monitoring report. Each monitoring report should include a discussion of the analytical results and a list of recommendations for action in the next quarter. Please inform me if you need any assistance in obtaining the appropriate permits to perform the off-site monitoring.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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Enclosure (Ms. Guensler, Mr.Dockum)

C: B. Chan, files

Mr. Mark Dockum, ERI, Inc., 74 Digital Drive, Suite 6, Novato, CA 94949

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DAVID J. KEARS, Agency Director

R0#390

July 2, 1998 StID # 245

Ms. Maria Guensler Exxon Company, USA P.O. Box 4032 Concord, CA 94524-4032 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Exxon RAS #7-0238, 2200 E. 12th St., Oakland CA 94601

Dear Ms. Guensler:

Our office has received and reviewed the Second Quarter 1998 groundwater monitoring report for the above site. As you are aware, this site has experienced a significant release of MTBE with concentrations as high as 150,000 ppb being found in monitoring well MW9C. In addition, all wells at the site except the upgradient well, MW9D, have also exhibited MTBE at elevated concentrations (18-53 ppm). Mr. Marc Briggs, formerly of Environmental Resolutions Inc.,(ERI), had wanted to discuss this site and solicit recommendations from our office. I have just spoke with Ms. Tracy Faulkner of ERI and we discussed this site. The following is a brief summary of our thoughts:

- It is not clear what type of remediation should be done given these levels of MTBE. This
 depends on a number of variables ie use of shallow groundwater in this part of Oakland, the
 type of geology present, potential of off-site migration and the presence of sensitive
 receptors.
- At this time, at a minimum, our office requires the monitoring of all wells, both on- and offsite for this parameter. The off-site wells will be located, permits obtained and sampled on a quarterly basis. Please justify any reduction or elimination of testing for TPHg and BTEX.
- Remedial approaches including hydrogen peroxide/catalyst addition et al will be evaluated.
- Every attempt should be made to determine the source of the MTBE plume. Several
 scenarios have been proposed to account for the release. If this wasn't the result of a onetime release, the underground tank system should be evaluated and tested for integrity.

Your next monitoring report should include sample results for all wells and propose an evaluation of the need to implement further site characterization or remediation.

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

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

C: B. Chan, files

Ms. T. Faulkner, ERI, 74 Digital Drive, Suite 6, Novato, CA 94949

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DAVID J. KEARS, Agency Director



September 22, 1997 StID # 245

Ms. Karen Petryna Texaco Refining and Marketing, Inc. 108 Cutting Blvd. Richmond CA 94804 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Groundwater Monitoring at 2200 E. 12th St., Oakland CA 94606

Dear Ms. Petryna:

As you are aware, our office has agreed to a revised annual monitoring program for the above site to be performed on monitoring wells MW-9I,9G, 9F and 9B during the first quarter of each year. This was based upon residual benzene concentration in these wells. However, it appears that the most significant chemical of concern at this site is MTBE. Based upon the First Quarter, 1997 sampling results, up to 9100 ppb MTBE was detected in well, MW-9I as confirmed by EPA Method 8240.

Since there is no regulatory action limit as yet for MTBE, the conservative levels of the odor or taste threshold (15-30 ppb) must be observed. Therefore, you should continue to analyze the above wells for MTBE along with TPHg and BTEX. In addition, you are requested to analyze well, MW-9c for TPHmo, TPHd and the metals; cadmium, chromium, lead, nickel and zinc during the annual monitoring event. This is requested because these analytes were detected in the soil sample taken subsequent to the recent waste oil tank removal of this site. After review of the annual monitoring results, our office will entertain altering the monitoring schedule.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: B. Chan, files

Mr. Micheal Faber, Exxon USA, 2300 Clayton Rd., Suite 1250,

Concord, CA 94524-2032

Mr. K. Winemiller, PEG, Inc., 2025 Gateway Place, Suite 440,

San Jose, CA 95110

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DAVID J. KEARS, Agency Director

R0#390

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

STID 245

November 20, 1996

Ms. Karen E. Petryna Texaco Refining and Marketing Inc. 108 Cutting Boulevard Richmond, CA 94804

RE:

2200 EAST 12TH STREET, OAKLAND CA 94606

Dear Ms. Petryna:

This office recently received and reviewed the case file for the above referenced Oakland site up to and including the October 29, 1996 Texaco "Groundwater Monitoring and Sampling, Third Quarter 1996" report.

Laboratory analyses of groundwater samples collected from well MW-9B, revealed TPHg and BTEX at concentrations of 210, 5.7, 6.8, 1.1, and 9.2 ppb, respectively. In addition, MTBE was detected in groundwater samples collected from wells MW-9B, MW-9F, MW-9G and MW-9I at concentrations of 31, 5.8, 18 and 170 ppb, respectively.

The State Water Resources Control Board (SWRCB) has recommended in its August 22, 1996 memorandum, that active LUFT (leaking underground fuel tanks) sites be monitored for the presence of methyl-tert-butyl ether (MTBE). SWRCB recommends that EPA method 8020A (or 8021B) be used to detect BTEX and MTBE compounds in LUFT groundwater samples. In addition, it is recommended that the groundwater sample which exhibits the highest concentration of MTBE (per EPA method 8020A or 8021B) be confirmed using EPA Method 8240B (or 8260A) to verify the correct identification of MTBE. For these samples the 8240B (or 8260A) value should be reported. Therefore, please incorporate this MTBE sampling protocol into the Fourth Quarter 1996 sampling event.

Please feel free to call me directly at 510/567-6880 should you have any questions concerning the content of this letter.

Sincerely,

Dale Klettke, CHMM

Hazardous Materials Specialist

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Karen E. Petryna RE: 2200 East 12th Street, Oakland November 20, 1996 Page 2 of 2

c: Bob Robles, c/o Texaco, 10 Universal City Plaza, Universal City, CA 91608 Michael Faber, c/o Exxon USA, 2300 Clayton Road, Suite 1250, Concord, CA 94524-2032

Keith Winemiller, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose, CA 95110

Thomas Peacock, LOP Manager--files 0245mtbe.cnf

DAVID J. KEARS, Agency Director

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STID 245

September 10, 1996

Ms. Karen E. Petryna Texaco Refining and Marketing Inc. 108 Cutting Boulevard Richmond, CA 94804 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, #250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE:

2200 EAST 12TH STREET, OAKLAND CA 94606

Dear Ms. Petryna:

This office recently received and reviewed the case file for the above referenced Oakland site up to and including the August 27, 1996 Pacific Environmental Group (PEG), Inc. "Groundwater Monitoring and Sampling Program" letter.

The PEG letter requests that the current groundwater monitoring program be reduced from a semi-annual to an annual schedule. In addition, the PEG, Inc. states that the next groundwater sampling event would be May 1997.

Alameda County Department of Environmental Health (ACDEH) requires that annual groundwater monitoring be conducted during the 1st quarter of every year. It is ACDEH's understanding that annual groundwater monitoring and sampling should be performed when groundwater elevations are at their highest. For your information, concentrations of detectable petroleum hydrocarbons are, for the most part, highest during periods of high groundwater elevations.

Therefore, at this time please adhere to a revised annual (1st quarter of every year) schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d) for groundwater monitoring wells MW-9B, MW-9F, MW-9G and MW-9I. Sample analytes shall continue to be total petroleum hydrocarbons as gasoline (TPHg), methyl-tert-butyl ether (MTBE) and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX).

For your information, this site was evaluated for case closure after review of the TEXACO June 24, 1996 groundwater sampling report, and the sensitive receptor investigation. At the present time, this site does not warrant closure for the following reason:

Concentrations of benzene detected in monitoring well MW-9B (130 ug/L) exceed CA-modified ASTM Tier 1 Risk-Based Screening Levels (RBSLs) for the commercial/industrial exposure scenario "Groundwater-Vapor Intrusion from Groundwater to Buildings" at a target level of 1E-06 (21 ug/L - 1 in 1,000,000 excess cancer risk).

Karen E. Petryna RE: 2200 East 12th Street, Oakland September 10, 1996 Page 2 of 2

However, it appears that further ASTM Tier evaluation is not warranted at this time. Continued annual groundwater monitoring and sampling will serve to confirm reduced concentrations of petroleum hydrocarbons (namely benzene). After documentation of the 1st quarter 1997 groundwater monitoring and sampling event, ACDEH will re-evaluate the site to determine whether case closure is warranted for this site.

Please feel free to call me directly at 510/567-6880 should you have any questions concerning the content of this letter.

Sincerely,

Dale Klettke, CHMM

Hazardous Materials Specialist

Tale Letter

c: Bob Robles, c/o Texaco, 10 Universal City Plaza, Universal City, CA 91608 Michael Faber, c/o Exxon USA, 2300 Clayton Road, Suite 1250, Concord, CA 94524-2032

Keith Winemiller, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose, CA 95110

Thomas Peacock, LOP Manager--files

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RO# 390
RAFAT A. SHAHID, DIRECTOR

STID 245

April 8, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577

(510) 567-6777

Ms. Karen E. Petryna Texaco Refining and Marketing Inc. 108 Cutting Boulevard Richmond, CA 94804

RE:

2200 EAST 12TH STREET, OAKLAND CA 94606

Dear Ms. Petryna:

This office recently received and reviewed the case file for the above referenced Oakland site up to and including the April 3, 1996 Pacific Environmental Group (PEG) "Utility Trench Investigation Report". This report documents the results of a utility trench investigation to determine whether existing utilities could be acting as preferential pathways for the migration of petroleum hydrocarbons in groundwater.

PEG concludes that although there exists the potential for utility trenches to serve as preferential groundwater migration pathways, it is unlikely, due to the following:

- Groundwater fluctuations at the site indicate that groundwater does not intersect the
 utility trenches year round and therefore, does not present a long-term preferred transport
 pathway.
- Groundwater elevation contours do not show any unusual deflections which may be expected if preferential migration were occurring.
- Groundwater concentrations typically are not very high. If preferential migration were
 occurring, dilution of the petroleum hydrocarbon impacted groundwater may be expected
 at the utility trench boundary.

It is my understanding that TEXACO proposes to conduct a sensitive receptor investigation at the site to identify any water wells within 250 feet of the site and to detect the presence of deeper drinking water aquifers, nearest surface water, and any other sensitive receptors which are likely to be impacted by the site. This final criteria is to be satisfied in order to designate this site as a "Low-Risk Groundwater Case" as defined in the Regional Water Quality Control Board's (RWQCBs) "Interim Guidance on Required Cleanup at Low Risk Fuel Sites".

At this time please adhere to a revised semi-annual (first and third quarters) schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d) for groundwater monitoring wells MW-9B, MW-9F, MW-9G and MW-9I. Sample analytes shall continue to be total petroleum hydrocarbons as gasoline (TPHg), methyl-tert-butyl ether (MTBE) and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX).

Ms. Karen E. Petryna RE: 2200 East 12th Street, Oakland April 8, 1996 Page 2 of 2

I realize that it is not possible to have the wells sampled during first quarter 1996. Therefore, please arrange to have wells MW-9B, MW-9F, MW-9H and MW-9I sampled during the month of April, 1996.

After documentation of the April 1996 groundwater monitoring and sampling event and the sensitive receptor investigation report, Alameda County Health Care Services Agency will reevaluate the site to determine whether case closure is warranted for this site.

Please feel free to call me directly at 510/567-6880 should you have any questions concerning the content of this letter.

Sincerely,

Dale Klettke, CHMM

Hazardous Materials Specialist

ec c:

Bob Robles, c/o Texaco, 10 Universal City Plaza, Universal City, CA 91608 Michael Faber, c/o Exxon USA, 2300 Clayton Road, Suite 1250, Concord, CA 94524-2032

Keith Winemiller, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose, CA 95110

Thomas Peacock, LOP Manager-files 0245let1.dkt





RO#390
RAFAT A. SHAHID, DIRECTOR

DAVID J. KEARS, Agency Director

STID 245

March 6, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6777

Ms. Karen E. Petryna Texaco Refining and Marketing Inc. 108 Cutting Boulevard Richmond, CA 94804

RE: 2200 EAST 12TH STREET, OAKLAND CA 94606

Dear Ms. Petryna:

This office recently received and reviewed the case file for the above referenced Oakland site up to and including the January 17, 1996 Texaco Refining and Marketing Inc., (Texaco) "ENV-STUDIES, SURVEYS, & REPORTS". This report documents the semi-annual groundwater sampling activities for three (3) on-site and two (2) off-site groundwater monitoring wells.

In addition, Texaco has previously submitted a "Management Plan and Work Plan for Non-Attainment Area Closure (NAA Plan) dated August 14, 1995 for the above referenced site. This NAA management and work plan was submitted before the California Regional Water Quality Control Board (RWQCB) distributed its January 5, 1996 "Supplemental Instructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Fuel Sites".

In response to the October 16, 1995, Lawrence Livermore National Laboratory (LLNL) Study entitled "Recommendations To Improve the Cleanup Process for California's Leaking Underground Fuel Tanks", RWQCB issued its December 8, 1995 "Interim Guidance on Required Cleanup at Low Risk Fuel Sites". These guidance documents concur with the findings and conclusions of the LLNL Study, which recommended that fuel sites be treated differently and less stringently than solvent sites. The study also concluded that most fuel sites fall into the low-risk category, for which source removal and passive remediation are adequate.

In order for your site to fall into the "Low Risk Groundwater Case" the following definitions must apply:

- The leak has been stopped and ongoing sources, including free product, have been removed or remediated.
- 2) The site has been adequately characterized.
- 3) The dissolved hydrocarbon plume is not migrating.
- 4) No water well, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.

Ms. Karen E. Petryna RE: 2200 East 12th Street, Oakland March 6, 1996 Page 2 of 2

- 5) The site presents no significant risk to human health.
- 6) The site presents no significant risk to the environment.

As referenced in the "Supplemental Intructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Fuel Sites", sites which are defined as a "Low Risk Groundwater Case" should have the presence or absence of horizontal and vertical conduits which could act as preferential pathways for the dissolved plume evaluated as a part of the site characterization process.

As documented in the enclosed Alameda County Health Care Services Agency (ACHCSA) letter from Thomas Peacock dated November 14, 1995, comments were given which asked for a plan to look at the presence or absence of "preferential pathways" such as utility trenches. This letter also commented that since shallow soils were affected, the best course of action might be for the excavation of impacted soils in the vicinity of monitoring well MW-9B.

Please notify this agency of the course of action you plan to follow for this site by submitting a work plan within 30 days of the date of this letter, or no later than April 8, 1996.

For your information, I have taken over management of this project from Thomas Peacock of this office. Please feel free to call me directly at 510/567-6880 should you have any questions.

Sincerely,

Dale Klettke, CHMM

Hazardous Materials Specialist

rele Dettille

enclosure

c: Bob Robles, c/o Texaco, 10 Universal City Plaza, Universal City, CA 91608 Michael Faber, c/o Exxon USA, 2300 Clayton Road, Suite 1250, Concord, CA 94524-2032

Keith Winemiller, Pacific Environemental Group, 2025 Gateway Place, Suite 440, San Jose, CA 95110

Thomas Peacock, LOP Manager--files

0245naa.nok

RVICES
AGENCY

DAVID J. KEARS, Agency Director

R0390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

November 14, 1995 STID 245

Texaco Environmental Svc. ATTN: Karen E. Petryna 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear Karen E. Petryna:

This office has received and reviewed an Env. Studies, Surveys & Reports dated August 14, 1995 by Texaco Refining and Marketing, Inc. for the above site. The following comments are to be considered:

- 1. Your request for an NAA for the above area may be premature for this site. It is not known whether there are preferential pathways such as utility trenches between the area of contamination, which is only 6.5 'deep, and the two downgradient wells that show no contamination. This is important to know if contamination is immobile or if it is remediating as it moves. Please propose a plan to look at this. Your plan for a NAA is acceptable but perhaps we should have a meeting, as you suggested in your cover letter.
- 3. The area of contamination seems to be around MW-9B. The water level is also very shallow. Further excavation of contaminated soils may be the best course of action now. This may be a quicker solution to obtaining site closure.

If you have any questions, please contact this office at (510) 567-6782.

Sincerely,

Thomas Peacock, Manager

Division of Environmental Protection

Bob Robles, Texaco, 10 Universal City Plaza, Universal City, CA 91608

Gordon Coleman, Acting Chief - files

Exxon, USA, Michael Faber, 2300 Clayton Rd., Suite 1250,

Concord, CA 94524-2032

Keith Winemiller, Pacific Env. Group, 2025 Gateway Pl., Suite 440, San Jose, CA 95110



R0390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

ALAMEDA COUNTY-ENV. HEALTH DEPT. ENVIRONMENTAL PROTECTION DIV. 1131 HARBOR BAY PKWY., #250 ALAMEDA CA 94502-6577 (510)567-6700

March 21, 1995 STID 245

Texaco Environmental Svc. ATTN: Karen E. Petryna 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear Karen E. Petryna:

This office has received and reviewed the Quarterly Report by Texaco Environmental Services dated January 4, 1995 for the above site. The following comments are to be considered:

- 1. Samples apparently were for 10-26-94 rather than 10-28-94, as reported. Please address reports to this office rather than to the Regional Water Quality Control Board. It is not necessary to send any reports to them as this agency is the lead in this case.
- 2. It appears that contamination always rises in the February and May sampling events. This is often a dramatic rise as in MW-9B from 200 to 12,000 TPHg, then from 98 to 1,000. Both of these years were followed by large drops in contamination. It appears this may be due to washing of the soil by percolating rainfall as it passes through contaminated soil above the groundwater. Often the water level rises in Spring, although this property is mostly paved (impermeable) and changes in water level do not seem to follow seasons. The water level is also very shallow. Further excavation of contaminated soils may be the best course of action now.

If you have any questions, please contact this office at (510) 567-6782.

Sincerely,

Thomas Peacock, Supervising HMS Hazardous Material Division

cc: Bob Robles, Texaco, 10 Universal City Plaza, Universal City, CA 91608

Gordon Coleman, Acting Chief - files

Exxon, USA, Michael Faber, 2300 Clayton Rd., Suite 1250, Concord, CA 94524-2032

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board

Alameda County CC 4580 Health Care Services Agency Dept. Of Environmental Health 1131 Harbor Bay Pkwy 2nd Flr. Alameda. CA 94502-6571

November 1, 1994 STID 245

Texaco Environmental Svc. ATTN: R. R. Zielinski 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear R. R. Zielinski:

This office has received and reviewed the Quarterly Report by Texaco Environmental Services dated August 4, 1994 (2nd qtr 94) for the above site. The following comments are to be considered:

- 1. This office accepts your not sampling monitoring wells 9c, 9d, 9f, and 9g, since they have been ND for more than 4 quarters.
- 2. Although there had been a drop in measured contamination in MW-9b, there have increases in the last 2 quarters. This last quarter was very high at 1000 ppb TPHg and 150 ppb benzene. This office would like to know what you will be doing to remediate this contamination.
- 3. It is imperative that you continue groundwater monitoring on a quarterly basis and to have reports submitted to this office in a timely manner. It is taking about 4 months to get a report to our office, which is unacceptable.

If you have any questions, please contact this office at (510) 567-6700. Note that our office has relocated and our phone number is new.

Sincerely,

Thomas Peacock, Supervising HMS Hazardous Material Division

cc: Bob Robles, Texaco, 10 Universal City Plaza, Universal City, CA 91608

Edgar Howell, Chief - files

Exxon, USA, E.E. Villasenor, 2300 Clayton Rd., Suite 1250, Concord, CA 94524-2032

DAVID J. KEARS, Agency Director

R0390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

January 31, 1994 STID 245

Texaco Environmental Svc. ATTN: R. R. Zielinski 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear R. R. Zielinski:

This office has received and reviewed the Quarterly Groundwater Monitoring Report by Resna dated January 6, 1993 (4th qtr 93) for the above site. The following comments are to be considered:

- 1. This office accepts your desire to not take further action beyond continued quarterly groundwater monitoring.
- 2. The continual drop in contamination in MW--9B, as the only contaminated well, is positive.
- 3. It is imperative that you continue groundwater monitoring on a quarterly basis and to have reports submitted to this office in a timely manner.

If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS

Hazardous Material Division

CC: Bob Robles, Texaco, 10 Universal City Plaza, Universal City, CA 91608

Edgar Howell, Chief - files

Exxon, USA, E.E. Villasenor, 2300 Clayton Rd., Suite 1250, Concord, CA 94524-2032

James Nelson, Resna, 3315 Almaden Exp., Suite 34, San Jose, CA 95118

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

AFAT A. SHAHID, ASST. AGENCY DIHECTOR

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

DAVID J. KEARS, Agency Director

December 28, 1993 STID 245

Texaco Environmental Svc. ATTN: R. R. Zielinski 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear R. R. Zielinski:

This office has received and reviewed the Quarterly Groundwater Monitoring Report by Resna dated November 2, 1993 (3rd qtr 93) for the above site. The following comments are to be considered:

- 1. The levels in MW-9b have essentially stayed the same with a small rise in benzene. The residual contamination seems to be concentrated around this well.
- 2. There are no recommendations in this report.

If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS

Hazardous Material Division

cc: Bob Robles, Texaco, 10 Universal City Plaza, Universal City, CA 91608

Edgar Howell, Chief - files

Exxon, USA, E. E. Villasenor, 2300 Clayton Rd., Suite 1250, Concord, CA 94524-2032

Philip Mayberry, Resna, 3315 Almaden Expressway, Suite 34, San Jose. CA 95118

Karen E. Petryna, Texaco, 100 Cutting Blvd., Richmond, CA 94804

DAVID J. KEARS, Agency Director

RO390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

August 26, 1993 STID 245

Texaco Environmental Svc. ATTN: R. R. Zielinski 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear R. R. Zielinski:

This office has received and reviewed the Quarterly Groundwater Monitoring Report by Resna dated August 6, 1993 (2nd qtr 93) for the above site. The following comments are to be considered:

- 1. This office accepts your desire to not take further action beyond continued quarterly groundwater monitoring.
- 2. It is also appropriate of you to investigate inventory records in an attempt to discover why the high level in 1 well during the previous quarter.
- 3. It is imperative that you continue groundwater monitoring on a quarterly basis and to have reports submitted to this office in a timely manner.

If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS

Hazardous Material Division

cc: Bob Robles, Texaco, 10 Universal City Plaza, Universal City,

CA 91608

Edgar Howell, Chief - files

Exxon, USA, Greg De Marzo, 2300 Clayton Rd., Suite 1250, Concord, CA 94524-2032

R0390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

(510) 271-4530

DAVID J. KEARS, Agency Director

July 7, 1993 STID 245

Texaco Environmental Svc. ATTN: Ron Zielinski 100 Cutting Blvd. Richmond, CA 94804

RE: 2200 E. 12th St., Oakland, CA 94606

Dear Ron Zielinski:

This office has received and reviewed the Quarterly Groundwater Monitoring Reports by Resna dated April 29 and May 6, 1993 (4th qtr 92 and 1st qtr 93) for the above site. The following comments are to be considered:

- 1. Monitoring well MW9H is the most downgradient well and the sample had 280 ppb of TPHg. The would demonstrate that the plume is not contained. There are no comments in this report concerning a large increase in contamination found.
- 2. MW-9B had 12,000 ppb TPHg and 320 ppb benzene, which is a very large increase. Resna, Texaco, or Exxon need to answer why, give some explanation, and comment on what work needs to be done in the future (conclusions or recommendations).

If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS

Hazardous Material Division

CC: Bob Robles, Texaco, 10 Universal City Plaza, Universal City,

Edgar Howell, Chief - files

Texaco, ATTN: .Zielinski, 100 Cutting Blvd., Richmond, CA 94804 Exxon, USA, Greg De Marzo, 2300 Clayton Rd., Suite 1250,

Concord, CA 94524-2032

DAVID J. KEARS, Agency Director

R0390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

April 28, 1993 STID 245

Exxon Co. U.S.A.
ATTN: G. DeMarzo
2300 Clayton Rd., Suite 1250
P.O. Box 4032
Concord, CA 94524-2032

RE: 2200 E. 12th St., Oakland, CA 94606

Dear G. DeMarzo:

This office has received and reviewed the Quarterly Groundwater Monitoring Report by Resna dated March 9, 1993 the above site. The following comments are to be considered:

- 1. Why was MW-9G not sampled, as it is a downgradient well that showed contamination in the last sample?
- 2. The sampling in this report was done Sep. 14, 1992. It has taken 6 1/2 months for this office to receive the report. Given the requirement for reports to be submitted each quarter, it is unacceptable for this type of delay. Reports must be submitted in a much more timely manner. At this time, sampling should have already been done again in Dec. 92 and Mar. 93. Comments like 2. above would not even be answered or changes to the sampling and reporting made if the reports take over 6 months to be issued.
- 3. MW-9F and MW-9G have both detected benzene within the last 4 quarters. They were not sampled this time. Resna, Texaco, or Exxon need to answer why, give some explanation, and comment on what work needs to be done in the future (conclusions or recommendations). If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS Hazardous Material Division

cc: Richard Hiett, RWQCB

Edgar Howell, Chief - files

Texaco, ATTN: R. Zielinski, 100 Cutting Blvd., Richmond, CA 94804

DAVID J. KEARS, Agency Director



R0390

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

November 16, 1992 STID 245

Exxon Co. U.S.A.
ATTN: G. DeMarzo
2300 Clayton Rd., Suite 1250
P.O. Box 4032
Concord, CA 94524-2032

RE: 2200 E. 12th St., Oakland, CA 94606

Dear G. DeMarzo:

This office has received and reviewed the Tank Excavation Assessment Report by Woodward-Clyde Consultants dated January 28, 1992, and 2 Quarterly Technical Reports by Harding Lawson Associates dated May 26 and September 9, 1992 concerning the above site. The following comments are to be considered:

- 1. There is no conclusion or recommendation for further work to be done at the site. Activities planned for the third quarter of 1992 were not discussed as HLA had no contract.
- 2. The 620 ppb TPHg and the 180 ppb benzene found in MW-9B on 5-5-92 is not insignificant. The benzene is the most important and there have been hits in every sample of this well.
- 3. The next quarterly monitoring report would be due now with sampling to have been done in August 1992. Please submit a report with some recommendation for further work you propose. The contamination seems to be fairly well delineated.

Enclosed is a format the Regional Board would like followed for site closure. Thank you for your cooperation. If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS

Hazardous Material Division

cc: Richard Hiett, RWQCB

Edgar Howell, Chief - files

Texaco, ATTN: R. Zielinski, 100 Cutting Blvd., Richmond, CA 94804

Enclosure

AGENCY DAVID J. KEARS, Agency Director



V R0390 (2200 E12th) R0391 (500 Grand)

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH 80 Swan Way, Rm. 210 Oakland, CA 94621 (415) 271-4300

January 9, 1992

Mr. William Wang EXXON Company, U.S.A. Marketing Department 2300 Clayton Road, Suite 1250 P.O. Box 4032 Concord, CA 94524-2032

RE: JANUARY EXXON COMPLIANCE MEETING; SS# 7-0237 AND 7-0238, 500 GRAND AVENUE AND 2200 EAST 12TH STREET, OAKLAND

Dear Mr. Wang:

The next Exxon compliance meeting has been scheduled for Tuesday, January 28, 1992. During this meeting the compliance status of the two referenced Exxon facilities will be discussed. The meeting will convene promptly at 9:00 AM and be held at the Alameda County Environmental Health Department office, located at 80 Swan Way, Room 200, Oakland.

Please call either myself or Mr. Ariu Levi, Supervising Hazardous Materials Specialist, at 415/271-4320 should this schedule prove inconvenient.

Sincerely,

Scott O./ Seery, CHMM

Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health Edgar Howell, Chief, Hazardous Materials Division Ariu Levi, Supervising Hazardous Materials Specialist Gil Jensen, Alameda County District Attorney's Office Lester Feldman, RWQCB



May 20, 1991

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

Ms. Elaine Hand Exxon Company USA C&M Center 4550 Dacoma Way 3rd Floor Houston, TX 77092

Re: Underground Storage Tank Operating Permit for Exxon R/S 7-0238, 2200 East 12th Street, Oakland, CA 94606

Dear Ms. Hand:

Enclosed is a five year underground storage tank operating permit for the above referenced facility. To operate under a valid permit, the facility is required to comply with the conditions as described in the California Code of Regulations, Title 23, Subchapter 16, Section 2712. These are briefly summarized below:

- The permittee shall report to our office within 30 days any changes in the uses of any underground storage tank. This includes the storage of any new hazardous substances, changes in monitoring procedures, or the replacement or repair of any part or all of an underground storage tank.
- The permittee shall report to our office any unauthorized release occurrences within the time frame of sections 2652(b) and (c).
- written records of all monitoring performed shall be maintained on-site by the operator for a period of at least 3 years from the date the monitoring was performed. These records shall be shown to our office upon demand during any site inspection. Monitoring records shall include the results of inventory readings and reconciliations, annual precision tests for all single-walled tanks, annual line-leak detection equipment tests, and any other monitoring equipment calibration and maintenance records. In addition, copies of all tank tests and line-leak detection tests shall be forwarded to our office. The operator is required to submit quarterly inventory reconciliation reports to our office (Section 2644 (e)).
- Permits may be transferred to new underground storage tank owners if the new underground storage tank owner does not change any conditions of the permit, the transfer is registered with the local agency within 30 of the change in ownership, and any necessary modifications are made to the

information in the initial permit application due to the change in ownership. Our office may review, modify, or terminate the permit to operate the underground storage tank upon receiving the ownership transfer request.

If you have any questions regarding the underground tank permit, feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

Cynthia Chapman

c: Area Hazardous Materials Specialist

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

February 8, 1991

Ms. Elaine Hand Exxon Company USA C&M Center 4550 Dacoma Way 3rd Floor Houston, TX 77092

Dear Ms. Hand:

In July, 1990, I inspected 4 Exxon Stations in the City of Oakland, specifically for compliance with the state underground storage tank regulations. Jo Beth Folger of the Walnut Creek Exxon office accompanied me on these inspections. The four stations and brief synopsis of each are listed below. I've included a brief description of what needs to be done for the Station to receive its 5-year permit:

(R0391) • Exxon SS #7-0327, 500 Grand Avenue

There is a question about the 3 fuel tanks being single walled or double walled. Our records indicate that Texaco identified them as single-walled, and when Exxon re-registered the tanks, it identified them as double-walled. I gave Jo Beth Folger new underground tank registration forms to complete with correct information. The waste oil tank has been removed. If these tanks are double-walled, we will require that the monitoring system be upgraded. No quarterly inventory variation reports have been submitted to our office. Our records show that the last precision test on the tanks was performed in June 1989, and the line leak detection system was tested in May 1990.

- Begin submitting quarterly inventory reconciliation reports, and submit new tank registration forms.
- (R0358) Exxon SS #7-0235, 2225 Telegraph Avenue

Line leak detection system tested in May 1990. No quarterly inventory variation reports have been submitted to our office.

Begin submitting quarterly inventory reconciliation reports. February 8, 1991 Exxon Oakland Stations Page 2

(No • Exxon SS #7-0236, 6630 E. 14th Street



Line leak detectors tested in 1990, tanks tested in 1989. No quarterly inventory variation reports have been submitted to our office.

- Begin submitting quarterly inventory reconciliation reports.
- (R0390) Exxon SS #7-0238, 2200 E. 12th. Street

Line leak detectors tested in 1990, tanks tested in 1989. No quarterly inventory variation reports have been submitted to our office.

Begin submitting quarterly inventory reconciliation reports.

Our billing office indicates that underground tank fees for these four stations are current.

Once we start receiving the quarterly inventory reconciliation reports, and current underground tank information from SS #7-0327, we can issue the 5-year permit.

I hope this clarifies the underground tank permitting status for these four stations. Please call me at 415/271-4320 if you have any questions.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

cc: Jo Folger, Exxon Tim Devens, Exxon

Scott Seery, Alameda County Environmental Health



October 22, 1990

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

Mr. Ron Zielinski Texaco Refining and Marketing 100 Cutting Blvd. Richmond, CA 94804

Re: Remediation at 2200 E. 12th Street, Oakland 94606

Dear Mr. Zielinski:

Alameda County Environmental Health Hazardous Materials Division has received and reviewed the quarterly reports and the Soil and Groundwater Remediation Plan for the above referenced site as prepared for you by Harding Lawson Associates. The proposal for removing soils containing greater than 100 ppm TPH in the vicinity of MW-9E is acceptable. It is also agreed that excavation is not, at this time, necessary in the area around SB-4 because of the potential of rupturing a fuel line and the lower TPH concentration found. Because the monitoring wells have indicated significant BTEX concentrations (17.1 ppb) only in this area, around MW-9E, the removal of this soil may remove the source of potential contamination. You are reminded to notify Alameda County of any changes in your proposed work plan and to send copies of all future proposals and quarterly reports to the SFRWQCB as well as our agency.

Please contact the undersigned at 271-4320 should you have any questions regarding this letter.

Sincerely,

Barney M. Chan

Barrey Ul Cha-

Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division Edgar Howell III, Chief Hazardous Materials Division Lester Feldman, SFRWQCB Mr. Randolph Stone, Harding Lawson Associates

LS

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

June 28, 1990

Mr. Ron Zielinski Texaco Refining and Machinery 100 Cutting Blvd. Richmond, CA 94804 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

Re: Deposit Fee for Oversight of Remediation at 2200 East 12th St., Oakland 94606

Dear Mr. Zielinski:

Alameda County Environmental Health, Hazardous Materials Division, has been contacted by Mr. Dan Heninger of Harding Lawson Associates regarding our oversight of the planned remediation at 2200 East 12th St., Oakland 94606. Please submit a check for \$500.00, payable to Alameda County, for our oversight of this project. Any plan review, sight visit, sample witnessing etc. will be deducted from this deposit at a rate of \$60.00/hr.

Please contact Barney Chan, Hazardous Materials Specialist, from our office at 271-4320 should you have any questions.

Sincerely,

Edgar B. Howell III

Chief, Hazardous Materials Division

cc: Rafat Shahid, Asst. Agency Director, Department of Environmental Health

files