

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

November 29, 2006

Ms. Jennifer Sedlachek
ExxonMobil Refining & Supply – Global Remediation
4096 Piedmont Avenue #194
Oakland, CA 94611

Mr. Mohammad Mashhoon
Mash Petroleum Inc.
5725 Thornhill Drive
Oakland, CA 94611

Mr. Victor Chu
3915 Forest Hill Avenue
Oakland, CA 94602

Subject: Fuel Leak Case No. **RO0000491**, Exxon #7-3006, 720 High Street, Oakland, CA 94601
– Work Plan Approval

Dear Ms. Sedlachek: Messrs. Mashhoon and Chu

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan for Limited Site Investigation and Well Installation Activities," dated November 11, 2006. The scope of work for the Work Plan proposes the abandonment of monitoring well MW-1. ACEH concurs with the proposed scope of work as stated in the Work Plan provided the following recommendations are implemented.

We request that you 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 steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Monitoring Well Abandonment and Replacement.** Environmental Resolutions Inc. (ERI) has been informed by the California Department of Transportation (Caltrans) that monitoring well MW-1 must be removed due to the installation of a retaining wall and other facilities beneath the Highway 80 corridor. Monitoring well removal will be completed in conjunction with the offsite investigation requested by ACEH. After the completion of work by Caltrans, and prior to the replacement of monitoring well MW-1, ACEH recommends that soil and groundwater data collected during the subsurface investigation be used to evaluate geologic and hydrogeologic conditions downgradient of the site. Subsequently, the evaluation will be used to determine the appropriate location for replacement monitoring well MW-1R. ACEH suggests the use of monitoring wells designed with screen intervals of between 2 to 5 feet, as these wells will likely be representative of depth discrete groundwater conditions. Prior to the installation of replacement monitoring wells, we request that ERI provide ACEH with their

monitoring well construction. Present your recommendations for monitoring well replacement in the SWI report requested below.

TECHNICAL REPORT REQUEST

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

- **January 30, 2007** – Soil and Groundwater Investigation Report with Monitoring Well Replacement Recommendations

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

Jennifer Sedlachek
November 29, 2006
Page 3

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) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Paula Sime
Environmental Resolutions, Inc.
601 North McDowell Blvd.
Petaluma, CA 94954

Donna Drogos, ACEH
Steven Plunkett, ACEH
File



7

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

RO0000491

June 7, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

RO 491

Dear Ms. Sedlachek:

Alameda County Environmental Health has received and reviewed the "May 24, 2005, Site Conceptual Model report", by Mr. James F. Chappell of Environmental Resolution Inc., and other documents regarding the above referenced site. As you are aware, there have been several meetings and discussions with you and or your representatives as well as with Mr. Mashoon, the current property owner, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- There has been some reduction in the concentrations of the CoCs.
- Additional work regarding the plume delineation work should concentrate on the south, west, and southwest areas for CoCs.
- As you are aware, it is still unclear whether the utility trenches provide any preferential pathway for the plume. Further investigation is necessary to determine this possibility.
- Further investigation of the site is necessary to address the litho logical discrepancies revealed by CPTs versus well logs and soil borings in the past.
- Please submit a workplan to address all the above issues.
- Further refinement of the Site Conceptual Model must be performed after the above issues are addressed.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

July 7, 2005 Work Plan

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.

PERJURY STATEMENT

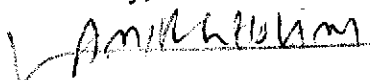
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or 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

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.

Should you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. James F. Chappell, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. M. Mashhoon, Mash Petroleum, Inc., 1721 Jefferson Street, Oakland, CA 94612
D. Drogos, A. Gholami



120491

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

RO0000491

June 7, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Peidmont Ave. #194
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek:

Alameda County Environmental Health has received and reviewed the "May 24, 2005, Site Conceptual Model report", by Mr. James F. Chappell of Environmental Resolution Inc., and other documents regarding the above referenced site. As you are aware, there have been several meetings and discussions with you and or your representatives as well as with Mr. Mashoon, the current property owner, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- There has been some reduction in the concentrations of the CoCs.
- Additional work regarding the plume delineation work should concentrate on the south, west, and southwest areas for CoCs.
- As you are aware, it is still unclear whether the utility trenches provide any preferential pathway for the plume. Further investigation is necessary to determine this possibility.
- Further investigation of the site is necessary to address the litho logical discrepancies revealed by CPTs versus well logs and soil borings in the past.
- Please submit a workplan to address all the above issues.
- Further refinement of the Site Conceptual Model must be performed after the above issues are addressed.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

July 7, 2005 Work Plan

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.

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

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.

Should you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. James F. Chappell, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. M. Mashhoon, Mash Petroleum, Inc., 1721 Jefferson Street, Oakland, CA 94612
D. Drogos, A. Gholami

Gholami, Amir, Env. Health

From: Jim F. Chappell [jchappell@ERI-US.com]
Sent: Thursday, May 05, 2005 12:57 PM
To: Gholami, Amir, Env. Health
Cc: jennifer.c.sedlachek@exxonmobil.com
Subject: Confirmation of Telephone Conversation Regarding Request for Extension for Site Conceptual Model for Former Exxon 7-3006, 720 High Street, Oakland, California

Mr. Gholami,

ERI would like to request an extension to the submittal date for the site conceptual model from May 20, 2005 to June 20, 2005.

As we discussed in our May 3, 2005 telephone conversation, ERI requested a 30 day extension to submit the report.

You denied that request, and proposed a revised submittal date of May 26, 2005 in the morning.

The reason for the request was to accommodate delays to the field work, including CalTrans permitting and difficulty in installing the boreholes, because portions of the site are backfilled with pea gravel and wooden timbers/logs.

This letter confirms the new report submittal date of May 26, 2005.

James Chappell
Program Manager

(707) 766-2090 Direct
(707) 789-0414 Fax
(415) 798-0071 Mobile
jchappell@eri-us.com

Environmental Resolutions, Inc.
601 North McDowell Blvd
Petaluma, California, 94954
www.eri-us.com

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



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

RO0000491

February 28, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Mr. M. Mashhoon
Mash Petroleum, Inc.
720 High Street
Oakland, CA 94611


Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek and Mr. Mashhoon:

Alameda County Environmental Health has received and reviewed the "Loan Secured by the real property commonly known at 720 High Street, Oakland" document, by Mr. Serge Chemla of America California Bank. Please be advised that this office cannot close the case at this time.

If you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Robert A. Saur, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
D. Drogos, A. Gholami



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

RO0000491

February 17, 2005

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek:

Alameda County Environmental Health has received and reviewed the "December 9, 2004, Comparison of Environmental Screening Levels and Work Plan for Supplemental Evaluation of Soil and Groundwater Report", by Mr. Robert A. Saur of Environmental Resolution Inc., along with the remaining documents regarding the above referenced site.

I have also had several meetings and discussions with you and or your representatives as well as with Mr. Mashoon, the property owner, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- Per document in our files and the above report there were up to 30.8 ppb, 793 ppb, 3.6 ppb, 176 ppb, 53 ppb, 3,620 ppb, and 4,320 ppb of MTBE, Benzene, Toluene, EthylBenzene, Xylenes, TPHd, and TPHg respectively detected in groundwater during the last monitoring and sampling event. This analysis was performed to obtain a more recent current data regarding the above referenced site and its vicinity. The above workplan also compared ESL values to the COCs concentrations at the site for commercial scenario as applicable.
- Per above document there are number of areas where the concentrations of the constituents are above the ESL levels in soil and to some extent in groundwater. This must be addressed along with plume delineation before the case can be considered for closure.
- Develop and submit a Site Conceptual Model (SCM). This must include geological cross sections, interpretive vertical and horizontal drawing of the

plume (not just a plot of laboratory results), depth of groundwater, monitoring wells and screens, conduits, groundwater flow and locations of receptors, etc.

- Include a plot plan with all soil borings along with concentrations at different depths.
- I concur with the above workplan. However, please ensure that your borings does not terminate at 12 feet but rather shall continue to at least 20 feet bgs.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

March 17, 2004 Result of the Work Plan

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.

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.

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.

Professional Certification

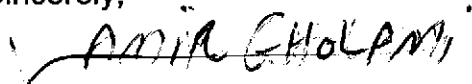
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

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 do not hesitate to call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Robert A. Saur, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. M. Mashhoon, Mash Petroleum, Inc., 1721 Jefferson Street, Oakland, CA 94612
D. Drogos, A. Gholami

Fax Cover Sheet

MASH PETROLEUM, INC

1721 JEFFERSON ST
OAKLAND, CALIFORNIA 94612
510-891-9988
510-891-9989fax

Send to: <i>MR. AMIR:</i>	From: <i>MO</i>
Attention:	Date:
Office Location:	Office Location:
Fax Number: <i>337-9335</i>	Phone Number:

- Urgent
- Reply ASAP
- Please comment
- Please Review
- For your Information

Total pages, including cover:

Comments:

Dear Amir,
Per Mr. Levy's Report I am faxing
the Bank's letter which Demand for site closure
at 720 High ST. OAKland,

Regards
[Signature]



AMERICA CALIFORNIA BANK

January 25, 2005.

Mr. M. Mashhoon
President,
Mash Petroleum, Inc
1721 Jefferson Street
Oakland, CA 94612

By Fax: 510 - 891 - 9989

**RE: Loan secured by the real property commonly known as 720 High Street,
Oakland, CA.**

Dear Mr. Mashhoon:


We wish to receive your progress report on one of the conditions governing the above referenced loan which consists in you providing the bank:

"Within six months of loan funding, borrower will provide to bank a "site closure letter" issued by the County of Alameda referring specifically to the site located at 720 High Street, Oakland, CA"

The period of six months will expire on March 9, 2005.

Past that date, the loan will be in technical default, which you most probably will wish to avoid and thus keep your good credit standing.

We look forward to continue extending our best banking service to you and your company.


Serge Chemla
Vice President

Date:3/3/05
RO #:491
From: Amir
Subject:extension

Rob Saur asked for an extension regarding wp, I gave him till May 20, 05 due to caltrans right of the way.
I approved it.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

December 7, 2004 Work Plan and Risk Assessment

If you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Robert A. Saur, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
D. Drogos, A. Gholami



Ro491

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

RO0000491

November 15, 2004

RO0000491

Ms. Jennifer C. Sedlachek
ExxonMobil Corporation
4096 Piedmont Ave. #194
Oakland, CA 94611

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Ms. Sedlachek:

Alameda County Environmental Health has received and reviewed the May 20, 2004, Annual Groundwater Monitoring Report by Mr. Robert A. Saur of Environmental Resolution Inc., along with the remaining documents regarding the above referenced site. I also held a meeting with you and your representatives on October 10, 2004, where we discussed how to proceed forward regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

Per document in our files there were up to 5,090 ppb, 1,130 ppb, and 0.70 ppb of TPH-g, Benzene, and MTBE respectively detected in MW-6 during the last monitoring and sampling event. Per discussion during our meeting, ERI would perform a monitoring and sampling event to obtain more recent current data regarding the above referenced site and its vicinity. Having obtained such data, ERI will perform a risk assessment and compare the current concentrations to current environmental screening levels (ESLs). Lastly, ERI will use the results of the ESL comparison and risk assessment to prepare a work plan that will evaluate the lateral and vertical extent of plume in soil and groundwater.

Please submit risk assessment and work plan detailing your proposal to define the extent of soil and groundwater contamination along other issues discussed by December 7, 2004. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

ExxonMobil
Refining & Supply Company
Global Remediation

Jennifer C. Sedlachek
Project Manager

4096 Piedmont Avenue #194
Oakland, California 94611
510.547.8196
510.547.8706 Fax
jennifer.c.sedlachek@exxonmobil.com

ExxonMobil
Refining & Supply

September 28, 2004

Mr. Amir Gholami
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Former Exxon Service Station Sites Located in Alameda County.

Dear Mr. Gholami:

Effective September 20, 2004, Mr. Gene N. Ortega is no longer handling the oversight of these sites.

Former Exxon Service Station 7-0104, 1725 Park Street, Alameda, California - RO 448
Former Exxon Service Station 7-0235, 2225 Telegraph Avenue, Oakland, California - RO 358
Former Exxon Service Station 7-0238, 2200 East 12th Street, Oakland, California - RO 390
Former Exxon Service Station 7-3006, 720 High Street, Oakland, California - RO 491 ✓

I (Ms. Jennifer C. Sedlachek) am now the ExxonMobil Project Manager for these sites. Please direct all correspondences and inquiries regarding these sites to me at:

Phone: 510.547.8196
Fax: 510.547.8706

Address: 4096 Piedmont Avenue #194
Oakland, California 94611

Electronic Mail: Jennifer.C.Sedlachek@exxonmobil.com

Sincerely,



Jennifer C. Sedlachek
Project Manager



ENVIRONMENTAL RESOLUTIONS, INC.

FACSIMILE COVER SHEET

TO: Amir Gholami
COMPANY: Alameda County
PHONE: 510-567-6876
FAX: 510-337-9335

20491
407-766-2000
New

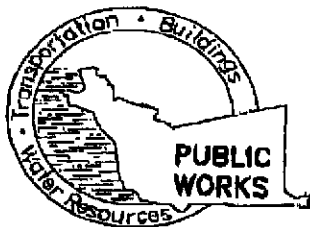
FROM: LIZ CULLMANN
COMPANY: ENVIRONMENTAL RESOLUTIONS, INC.
PHONE: (415) 382-4309
FAX: (415) 382-1856

DATE: 3/3/04
PAGES (Including Cover): 3

SUBJECT: Department Water Resource Release Form
COMMENTS:

Please fill out + fax back to
the above fax number
Thank you

2010



COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY
WATER RESOURCES SECTION
399 Elmhurst Street, Hayward, CA 94544-1395
James Yoo PH: (510) 670-6633 FAX (510) 782-1939

R0491

WELL COMPLETION REPORT RELEASE AGREEMENT—AGENCY
(Government and Regulatory Agencies and their Authorized Agents)

Project/Contract No. 201014X former EXANT-3006
Township, Range, and Section 720 High St Oakland CA County Alameda
(Must include entire study area and a map that shows the area of interest.) T2S, R2W, Sec 8 Radius 2000'

Under California Water Code Section 13752, the agency named below requests permission from Department of Water Resources to inspect or copy, or for our authorized agent named below to inspect or copy, Well Completion Reports filed pursuant to Section 13751 to (check one):

Make a study, or,

Perform an environmental cleanup study associated with an unauthorized release of a contaminant within a distance of 2 miles.

In accordance with Section 13752, information obtained from these reports shall be kept confidential and shall not be disseminated, published, or made available for inspection by the public without written authorization from the owner(s) of the well(s). The information shall be used only for the purpose of conducting the study. Copies obtained shall be stamped CONFIDENTIAL, and shall be kept in a restricted file accessible only to agency staff or the authorized agent.

Environmental Resolutions, Inc. Alameda County Amir Chikami
Authorized Agent Government or Regulatory Agency

73 Digital Drive Ste 100
Address

Novato, CA 94949
City, State, and Zip Code

Bob L. Collmann
Signature

Senior Staff Geologist
Title

Telephone (415) 382-4309

Fax (415) 382-1856

Date 3/3/04

E-mail LCollman@eri-vs.com

1131 Harbor Bay Plaza 2nd
Address

Alameda, CA 94502
City, State, and Zip Code

W. Anne Williams
Signature

Harbor Bay Plaza
Title

Telephone 510 567-6876

Fax (910) 337-9335

Date 3/18/04

E-mail

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

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) 337-9635

December 11, 2000
StID #136

Mr. Darin Rouse
ExxonMobil Corporation
P.O. Box 4032
Concord, CA 94524-4042

Re: Former Exxon Service Station 7-3006, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

*also MW3 **
Our office has received the notification letter for the scheduled decommissioning of monitoring wells MW7 through MW11, MW11, MW13, MW15, recovery wells RW1 through RW7 and vadose wells VW2 and VW3 as the above referenced site. ERI states that this work will be done on December 21 and 22, 2000. Our office assumes that the air sparge wells remaining will be re-initiated to enhance bio-remediation soon thereafter and that your annual monitoring of the remaining wells will be done in the first quarter of 2001.

Our office is not aware of any results, qualitative or quantitative, from the past underground tank, piping and dispenser upgrades. This work is being done under the City of Oakland oversight and our office has not received any information regarding this work. Any information requests regarding this work should be made to Mr. Steve Craford of the City of Oakland. Unless a new release can be shown, no additional RP can be named.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Chappell, ERI, 73 Digital Drive, Suite 100, Novato, CA 94949-5791
Mr. V. Chu, 3915 Forest Hill Ave., Oakland CA 94602

Stat720High

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

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

July 28, 2000
StID # 136

Mr. Darin Rouse
ExxonMobil Corporation
P.O. Box 4032
Concord, CA 94524-4032

Re: Former Exxon Service Station, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

Our office has received and reviewed Environmental Resolutions, Inc. (ERI) May 1, 2000 Quarterly Groundwater report for the above site. Subsequently, our office reviewed ERI's work plan, **Well and Remediation System and Annual Monitoring** report. After discussion, we concurred on the destruction of wells #3, 7,8,9,10,11, 13 and 15. ERI would restart air sparging in the sparge wells located in the extraction trench to enhance aerobic bio-remediation. Any off-site investigation would be put on hold and lastly, the remaining wells, MW 1,2,4,6,12 and 14 would be sampled annually, presumably within the first quarter of each year.

In addition, our office is aware of the ongoing piping and dispenser upgrade being performed by the current operator. Apparently, soil sampling was not done during the upgrade and the City of Oakland has requested this work be done, with the County's urging. It is unfortunate that any former release from these areas may never be totally identified. Please attempt to obtain and provide our office of a copy of the sampling report and any qualitative description of the original conditions of the piping and dispenser areas.

I understand that because of the renovation and upgrade activities going on at this site, the proposed well destruction and air sparging is on hold. Please continue to update our office in a quarterly report of any activities or change of status on this site.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. J. Chappell, ERI, 73 Digital Dr., Suite 100, Novato, CA 94949-5791

Stat720High

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



March 28, 2000

StID # 136

Mr. Darin Rouse
Exxon Co., 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: Work Plan for Annual Monitoring, Well Destruction and Remediation System
Removal, Former Exxon RAS # 7-3006, 720 High St., Oakland CA 94601**

Dear Mr. Rouse:

Our office has received and reviewed the March 14, 2000 work plan for the above site, prepared by Environmental Resolutions, Inc. (ERI). This work plan responds to my January 26, 2000 letter and follows our March 3, 2000 meeting. In our meeting, it was agreed that on-going monitoring would be required for the site due to the high residual TPHd and TPHg levels found in groundwater. This work plan calls for the annual monitoring of a selected number of wells, the destruction of the others and the decommissioning of the remediation system.

Our office has the following comments and concerns with this work plan:

- The off-site extent of the groundwater plume has not been defined. Assuming the historic gradient, a minimum of one additional off-site well should be installed down-gradient of MW-12.
- There is a lack of oxygen in groundwater at this site, therefore, natural aerobic bio-remediation has not been able to reduce TPH concentrations significantly. Since you are recommending natural attenuation as the remedial approach, please attempt to oxygenate groundwater. Because there are already six air-sparge wells within the recovery trench, it would seem appropriate to use these wells in introduce oxygen, if possible. Other wells could also be used to sparge air into groundwater. Please comment on the feasibility of using existing the wells to add oxygen or air into groundwater.

Although some of the wells need not be monitored and may be destroyed, at this time, we do not agree in entirely with the proposed work plan. MW3 should be kept and monitored since it has high TPH concentrations and is on the property boundary. Monitoring wells MW8, 13, 5 and 6 may be useful as locations for oxygen or air sparging. We agree that MW11, MW10, MW7, MW9 and MW15 add little useful information or utility and can be closed. Please comment on the above prior to closure of any of the items of which we are in disagreement. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files monwp720

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

January 26, 2000
StID # 136

Mr. Darin Rouse
P.O. Box 4032
Concord CA 94524-4032

Re: Former Exxon RAS# 7-3006, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

Our office has received and reviewed the November 23, 1999 Natural Attenuation and Risk-Based Corrective Action report submitted by your consultant, Environmental Resolutions, Inc., (ERI). The purpose of the report was to determine if conditions indicate that natural attenuation is occurring and whether any risk to human health exists. Although it appears that no human health risk exists as shown in your RBCA evaluation, the data evaluating the natural attenuation parameters is inconclusive. It appears that both aerobic and anaerobic bio-degradation is occurring, however, concentrations of petroleum hydrocarbons remain elevated in a number of monitoring wells. This is true even though the removal of hydrocarbons from groundwater and vapor extraction have long reached asymptotic levels. This is indicative of contamination in saturated soils, which are difficult to remove through these technologies.

Your consultant requests site closure with the continuance of monitoring in wells, MW-2, MW-9, MW-10 and MW-12. Site closure is inconsistent with on-going monitoring. At this time, our office does not concur with site closure. It appears a reasonable alternative is to consider the following options:

- Provide a modified groundwater monitoring schedule, eliminating wells with inconsequential value. The previously recommended wells alone do not appear adequate to characterize this site.
- Consider if another remediation approach would better benefit the site. Perhaps some type of enhanced bio-remediation would better treat the residual contamination.

Please feel free to contact me to discuss these or other options to manage this site. I may be reached at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

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

Remed720High

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

January 20, 2000
StID # 136

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

Re: Well Destruction at Former Exxon Station 7-3006, 720 High St., Oakland CA 94601

Dear Mr. Rouse:

This letter approves the destruction of vapor well VW1 as proposed by Lebeck Construction and requested by your consultant ERI. Our office is still evaluating the appropriateness of your recent request for site closure. It is believed that a meeting with you and/or your consultants may be appropriate once we have concluded our review of the cumulative site data, to discuss any differences.

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

Sincerely,

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

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. J. Chappell, Environmental Resolutions Inc. (by fax only)

vwel-720High



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
2014 T Street • Sacramento, California 95814 • (916) 227-4106
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrc.ca.gov/> - phone@swrcf

Gray Davis
Governor

DEC 29 1999

R0491

5710136

BC

Candy G. Woolford
Exxon Company USA
P O Box 951139
Dallas, TX 75395-1139

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, PROGRAM MANAGER
DECISION FOR ELIGIBILITY DETERMINATION: CLAIM NUMBER 001447; FOR SITE
ADDRESS: 720 HIGH STREET, OAKLAND

I have received your request for a Program Manager Decision. After review of the request and supporting arguments, I have decided to find in your favor and to accept the claim on the Priority List in Priority Class "D" with a deductible of \$10,000.

We have completed our initial review. The next step in the claim review process is to conduct a compliance review.

Compliance Review: Staff reviews, verifies, and processes claims based on the priority and rank within a priority class. After the Board adopts the Priority List, your claim will remain on the Priority List until your Priority Class and rank are reached. At that time, staff will conduct an extensive Compliance Review at the local regulatory agency or Regional Water Quality Control Board. During this Compliance Review, staff may request additional information needed to verify eligibility. Once the Compliance Review is completed, staff will determine if the claim is valid or must be rejected. If the claim is valid, a Letter of Commitment will be issued obligating funds toward the cleanup. If staff determine that you have not complied with regulations governing site cleanup, you have not supplied necessary information or documentation, or your claim application contains a material error, the claim will be rejected. In such event, you will be issued a Notice of Intended Removal from the Priority List, informed of the basis for the proposed removal of your claim, and provided an opportunity to correct the condition that is the basis for the proposed removal. Your claim will be barred from further participation in the Fund, if the claim application contains a material error resulting from fraud or intentional or negligent misrepresentation.

Record keeping: During your cleanup project you should keep complete and well organized records of all corrective action activity and payment transactions. If you are eventually issued a Letter of Commitment, you will be required to submit: (1) copies of detailed invoices for all corrective action activity performed (including subcontractor invoices), (2) copies of canceled checks used to pay for work shown on the invoices, (3) copies of technical documents (bids, narrative work description, reports), and (4) evidence that the claimant paid for the work performed (not paid by another party). These documents are necessary for reimbursement and failure to submit them could impact the amount of reimbursement made by the Fund. *It is not necessary to submit these documents at this time; however, they will definitely be required prior to reimbursement.*

Compliance with Corrective Action Requirements: In order to be reimbursed for your eligible costs of cleanup incurred after December 2, 1991, you must have complied with corrective action requirements of Article 11, Chapter 16, Division 3, Title 23, California Code of Regulations. Article 11 categorized the

corrective action process into *phases*. In addition, Article 11 requires the responsible party to submit an *investigative workplan/Corrective Action Plan* (CAP) before performing any work. This phasing process and the workplan/CAP requirements were intended to:

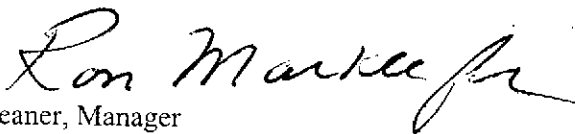
1. help the responsible party undertake the necessary corrective action in a cost-effective, efficient and timely manner;
2. enable the regulatory agency to review and approve the proposed cost-effective corrective action alternative before any corrective action work was performed; and
3. ensure the Fund will only reimburse the most cost-effective corrective action alternative required by the regulatory agency to achieve the minimum cleanup necessary to protect human health, safety and the environment.

In some limited situations *interim cleanup* will be necessary to mitigate a demonstrated immediate hazard to public health, or the environment. Program regulations allow the responsible party to undertake interim remedial action after: (1) notifying the regulatory agency of the proposed action, and; (2) complying with any requirements that the regulatory agency may set. Interim remedial action should only be proposed when necessary to mitigate an immediate demonstrated hazard. ***Implementing interim remedial action does not eliminate the requirement for a CAP and an evaluation of the most cost-effective corrective action alternative.***

Three bids and Cost Preapproval: Only corrective action costs required by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. You must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work. ***If you do not obtain three bids and cost preapproval, reimbursement is not assured and costs may be rejected as ineligible.***

If you have any questions, please contact Shari Knieriem at (916) 227-4366.

Sincerely,



Dave Deaner, Manager
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd fl.
Alameda, CA 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

July 14, 1999
StID #136

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

RD 91

**Re: Biodegradation Monitoring Program, Reduced Monitoring and Proposed System
Shutdown at Former Exxon Station 7-3006, 720 High St., Oakland CA 94621**

Dear Ms. Guensler:

Our office has received and reviewed the May 25, 1999 report from Environmental Resolutions, Inc. (ERI), your consultant, the contents of which are referenced above. I have also discussed the site with Mr. Pete Petro of ERI. As you will recall, this report responds to items brought during our April 1999 meeting at the County offices. The following items, which were discussed in the meeting, are addressed in this report:

- It was your belief that the existing soil vapor and groundwater treatment systems had reached asymptotic levels and that natural attenuation would be expected to reduce concentrations further. Therefore, monitoring for specific bio-attenuation parameters would be preferred to continuing to operate the treatment systems with minimal gain.
- The requirements for a "low risk" soil and groundwater site as defined by the RWQCB were discussed as they pertain to this site. The presence of a sheen on groundwater samples was attributed to a non-underground tank source since the groundwater concentrations for TPHg and TPHd in wells reporting a sheen were not at saturated levels. Therefore, it appears that free product from the former USTs does not exist. The off-site well, MW1, has historically been low to non-detect for the petroleum constituents. Therefore, the release appears to be limited to the site. I was also informed that a human health risk assessment had been prepared but had not yet been submitted. The results of the assessment reportedly indicate that no unacceptable risk to human health exists at the site.
- Because of the amount of information existing for the site, a modified monitoring program was proposed to eliminate low impacted and duplicative wells.

Our office generally approves of the above-mentioned proposals with the following conditions/requirements:

- The bio-attenuation parameters, dissolved oxygen, nitrates, dissolved ferrous iron, dissolved hydrogen sulfide, dissolved methane and oxidation-reduction potential are proposed. Please insure that dissolved oxygen and oxidation-reduction potential are tested in the field. In addition, please add dissolved sulfate to your list of parameters. Be sure to provide an interpretation of these results and any recommendations in your future monitoring reports. Wells MW1, MW9 and MW10 will be used to represent conditions outside the plume and wells MW2, MW4, MW12 and MW13 will be used to represent conditions within the plume.

Ms. M. Guensler
Former Exxon #7-30007, 720 High St., Oakland CA 94601
StID # 136
July 14, 1999
Page 2.

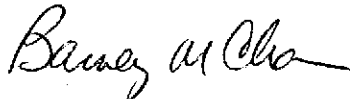
- The modified monitoring schedule proposes to discontinue sampling wells MW9, MW10, and MW-11 for all analytes, due to low historical concentrations. Quarterly monitoring is proposed for wells MW1, MW2, MW4, MW12 and MW13. Therefore, monitoring would also be discontinued for wells MW3, MW6, MW7, MW8, MW14 and MW15. These wells, I assume are being eliminated due to either of low concentrations or duplicative information. Our office agrees with this proposal, except MW6 should continue to be sampled due to historically high benzene concentrations. Please continue to take groundwater elevation readings from all wells when preparing the groundwater gradient map. In order to investigate the sheen reported on some wells, please have your laboratory filter and perform a silica gel cleanup on all samples prior to running TPHd analysis. Please also have your TEPH analysis (8015) extend to TPHmo. This may expose background contamination from fill material.
- Our office agrees that the amounts of TPH removed from the groundwater and vapor extraction systems has reached levels of diminishing returns. They may be shut down to verify that groundwater conditions are representative of actual conditions.
- Please submit your previously prepared health risk assessment.

Prior to recommendation of site closure as a "low risk" you will need to verify that groundwater concentrations have declined and reached equilibrium levels. You may need to provide plots of concentration versus time and/or offer a statistical analysis. You will need to resolve the presence of a sheen in well samples and you must verify no risk to human health or the environment. Conditions conducive to natural bio-degradation must also exist.

You may incorporate the above changes and conditions.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. Petro, Environmental Resolutions, Inc., 73 Digital Drive, Suite 100, Novato, CA
94949-5791

resp720High

EXXON COMPANY, U.S.A.

P.O. BOX 4032 • CONCORD, CA 94524-4032

MARKETING DEPARTMENT • ENVIRONMENTAL ENGINEERING

MARLA D. GUENSLER
SENIOR ENGINEER

(925) 246-8776
(925) 246-8798 FAX

June 24, 1999

Mr. Barney Chan
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

RE: EXXON RAS #7-3006/720 HIGH STREET, OAKLAND, CALIFORNIA

Dear Mr. Chan:

As discussed in a meeting between Alameda County, Exxon, and Environmental Resolutions, Inc. (ERI) on April 22, 1999, attached for your review and comment is a proposal entitled **Biodegradation Monitoring Program, Reduced Monitoring, and Proposed System Shutdown**, dated May 25, 1999. The proposal was prepared by ERI of Novato, California and details the request for remediation system shutdown at the site. In addition, this request states the methodology to ascertain whether specific conditions exist for natural attenuation through biodegradation. This proposal reiterates the discounted monitoring of wells MW9, MW10, and MW11 for TPPHg, BTEX, and MTBE. Exxon will implement this program upon receipt of your written approval of this proposal.

If you have any questions or comments, please contact me at (925) 246-8776.

Sincerely,


Marla D. Guensler
Senior Engineer

attachment: ERI's Biodegradation Monitoring Program, Reduced Monitoring, and Proposed System Shutdown,
dated May 25, 1999

cc: w/attachment:
Mr. Stephen Hill - California Regional Water Quality Control Board, San Francisco Bay Region

w/o attachment:
Mr. Pete Petro - ERI, Novato

99 JUN 29 PM 3:18
ENVIRONMENTAL
PROTECTION

FAX COVER SHEET

DATE: 4-28 1999

TO: KENNETH LEUNG PHD
A.G.S. INC.

FAX# (415) 522-4874

Total number of pages including cover sheet 1

FROM: Earlene Colenati-Alt
Environmental Health/Hazardous Material

NOTE:

PLEASE RESPOND BY FAX ONLY.

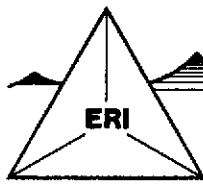
Please bring your business card and present upon arrival

for your appointment on : FRIDAY APRIL 30TH

at 9:30 AM

(SMILE) HAVE A NICE DAY
DO SOMETHING FOR OUR ENVIRONMENT

1000000



ENVIRONMENTAL RESOLUTIONS, INC.

January 24, 1995

ERI 2010-5

Mr. William Meckel
East Bay Municipal Utility District
P.O. Box 24055
Oakland, California 94623-1055

Subject: Request for Modification of Arsenic Wastewater Discharge Limit, Former Exxon Service Station 7-3006, 720 High Street, Oakland, California.

Mr. Meckel:

At the request of Exxon Company, U.S.A. (Exxon), Environmental Resolutions, Inc. (ERI) is submitting this letter to request a modification of arsenic discharge limits in East Bay Municipal Utility District (EBMUD) permit 502-91101 to the local sanitary sewer system. ERI is requesting this modification because the existing discharge limit appears inordinately low based on drinking water standards.

The basis for this request is as follows:

- 1) ERI understands the EBMUD NPDES permit allows for the discharge of up to 0.2 parts per million (ppm) arsenic into the bay. ERI detected 0.0076 ppm in the initial effluent water sample collected from the onsite treatment system at the subject site and the background arsenic concentration in groundwater is 0.016 ppm. The detected effluent concentration is well below the EBMUD limit and, combined with other EBMUD accounts discharging approximately the same concentration, will not jeopardize EBMUD's ability to meet their conditions.
- 2) ERI does not anticipate the proposed arsenic discharge limits will limit the effectiveness and reuse of sludge materials. The Total Threshold Limit Concentration (TTLC) specified in Title 22 of the California Code of Regulations for arsenic in soil is 500 ppm. The Soluble Limit Threshold Concentration (STLC) specified in the California Code of Regulations for arsenic is 5 ppm. Each are well above the concentrations at issue.
- 3) The arsenic levels proposed are below drinking water standards set by the State of California and EPA and therefore ERI does not anticipate any collection system problems, corrosive effects, nor that precipitation will occur.
- 4) Because the State of California and EPA have set higher limits for drinking water than the levels ERI is proposing to discharge, ERI does not anticipate the arsenic levels to cause any worker Health and Safety issues. Drinking water limits are based on physiological effects as well as on the drinking water suppliers ability to meet the imposed standard. ERI anticipates both ERI and EBMUD can rely on the EPA and the State of California to set limits which will not cause adverse health and safety effects.

- 5) Background levels of arsenic in groundwater beneath the site exceed the existing discharge limit. The existing treatment system as-built is designed to treat hydrocarbons. Alternate methods for treating arsenic levels already within drinking water quality standards would be costly.

In accordance with EBMUD permit 502-91101 and ERI's discussions with yourself regarding potential arsenic concentrations in groundwater, ERI began operation of a remedial system at the subject site on January 9, 1995. Based on ERI's discussions with your office, arsenic concentrations were to be further evaluated during operating conditions to evaluate whether the pumping and groundwater treatment system caused background concentrations to decrease to below EBMUD established discharge limits. As required in the wastewater discharge permit, ERI collected appropriate water samples 1-hour after startup for analyses and submitted the results within 48-hours to EBMUD. On January 11, 1995, ERI submitted the results of analyses of water samples to Exxon and EBMUD in a letter, verbally notified your office that arsenic concentrations in discharge water exceeded the discharge limit, and immediately shut off the remedial system. Concentrations of arsenic detected in the effluent water sample were 0.0076 ppm and the effluent limit is 0.0012 ppm. Previous analyses of groundwater from existing wells detected a background arsenic concentration of 0.016 ppm.

The subject site is currently an operating service station. Exxon and ERI are in the process of attempting to remediate hydrocarbons in soil and groundwater. The existing remediation system utilizes a combination of groundwater pumping, air-sparging, and vapor-extraction for remediation of soil and groundwater. Groundwater pumping is necessary to capture and provide hydraulic control of the dissolved hydrocarbon plume beneath the site. Because the State of California Primary Maximum Contaminant Level (MCL) for drinking water for arsenic is 0.05 ppm and the Environmental Protection Agency (EPA) Maximum Contaminant Level (MCL) goal is 0.01 ppm, treatment of arsenic for water quality purposes is not necessary. This is based on the concentrations of arsenic detected to date falling within "drinking water" standards.

Based on the items discussed above, ERI and Exxon request that EBMUD permit 502-91101 be modified to increase the discharge limit for arsenic to the State of California MCL for drinking water of 0.05 ppm. ERI believes this request is reasonable because in addition to the above-referenced items, drinking water in selected cities within the State of California cannot meet the 0.0012 ppm limit currently established for discharge to the sanitary sewer.

ERI reanalyzed the initial water sample to confirm the arsenic levels detected; the subsequent analyses detected an arsenic concentration of 0.0077 ppm. As per discussions between ERI and your office, no water will be discharged to the sanitary sewer until the issue of arsenic in groundwater and potential wastewater discharge to the sanitary sewer system is resolved. ERI additionally requests that no violations be issued by EBMUD because ERI has proceeded with work at the site pursuant to ongoing discussions with EBMUD and is attempting to rectify the situation. Additionally, issuing a violation for exceeding discharge limits that drinking water in selected cities cannot meet appears unreasonable.

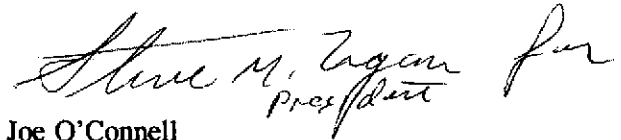
January 24, 1995

ERI appreciates your cooperation in this matter and would welcome the opportunity to discuss the proposed modification to permit 502-91101 and the arsenic concentrations detected during the initial sampling in further detail. Please call (415) 382-9105 with any questions.

Sincerely,
Environmental Resolutions, Inc.



Keith A. Romstad
Branch Manager



Joe O'Connell
Principal Engineer

cc: Ms. Marla Guensler, Exxon Company, U.S.A.
Mr. Barney Chan, Alameda County Department of Environmental Health

MEMORANDUM

DATE: September 28, 1993
 TO: LOP staff
 FROM: Scott Seery
 SUBJ: EXXON meeting, September 28, 1993

Today I met with Ms. Marla Guensler and Mr. Ernie Villasenor of EXXON Corporation. With them were representatives of their consultant, RESNA Corporation. Today's meeting, the second of a series, was in follow-up to a similar meeting held during March 1993. The status of all EXXON sites with UST investigations/clean-ups, for which ACDEH is the lead oversight agency and EXXON the lead RP, is the topic of this series.

As with the March meeting, the tone and outcome were "up-front," positive, and productive. Following is a summary of the issues discussed, listed by site.

STID	ADDRESS	CASE LEAD
<u>3601</u>	<u>1725 Park Street, Alameda</u>	<u>EXXON</u>

- o downgradient wells (3) installed off-site in May 1993, with two (2) of the three along Park not showing measurable HC impact as of this writing; minor impact (TPH, only) in well located on Eagle
- o informed EXXON of pending tank replacement at Shell station, 1701 Park, approximately 200' upgradient (crossgradient?) of site; EXXON is fairly convinced (read: hopeful) that their site has been impacted by an upgradient source, and that the Shell station appears to them to be the most likely candidate. (I told EXXON that I wasn't convinced of this yet, in the absence of any GW data on property between Shell and EXXON sites, that Shell is a potential contributory source. RESNA feels that the native formation [Meritt Sands?] has sufficient transmissivity to allow dispersion at a level consistent with the impact noted in on-site, upgradient well. I noted that this well and one other are crossgradient of the UST complex, and the impacts noted may just be the result of a fairly flat gradient.)
- o EXXON noted that the 1992 Hydropunch survey found concentrations of HCs adjacent to the Shell site similar to those found adjacent to the EXXON site, making them believe that Shell is a likely contributing source
- o **German Auto Repair** should be evaluated for presence of USTs. Do we currently know of any?
- o discussed potential for utility trenches in Park Ave. to act as conduits for expressing contaminants away, before being intercepted by downgradient, off-site wells. (May need to keep an eye on this.)

4103 7840 Amador Valley Blvd., Dublin EXXON

- o all appears to be on track
- o MTBE discovered recently,; EXXON indicates this additive may be a result of Texaco's activities - claim no knowledge of its use by EXXON
- o downgradient wells have minor hits, but absent aromatics at levels of concern
- o **Close to site closure** - monitor a few more quarters to see if trends continue
- o reduce sampling frequencies in MW-3 and MW-4:
 MW-3 annual
 MW-4 semiannual

2692 1175 Catalina Drive, Livermore Texaco?/ EXXON

- o investigation by Texaco before site transfer to EXXON (may have) identified waste oil tank leak [Copy of Texaco's "Exhibit J" report to be reissued.]
- o need to determine ACDEH should also name Texaco as RP for waste oil problem, if leak substantiated
- o EXXON is still RP for fuel problem - needs to perform PSA
- o EXXON will look for copies of tank test reports when still under Texaco control (pre 1988)
- o ACDEH needs to try to propagate a productive, integrated approach between Texaco and EXXON if both are required to perform PSAs for their commensurate problems

515 3450 - 35th Ave., Oakland EXXON ?

- o appears to be a minor residual problem - good candidate for closure (?)
- o discussion regarding need to (still) determine whether MW-1 is intercepting the trailing edge of the plume, or is in the heart of it; EXXON will review UST closure report and see if substantial problem was identified in soil at the time. EXXON will propose a Hydropunch survey downgradient of MW-1 should the closure report indicate high concentrations of HCs in soil at the time of closure. Alternatively, EXXON will review the report generated by Texaco prior to property transfer to EXXON. Should this report substantiate that "no problem" was found prior to transfer, EXXON may conclude that the Hydropunch survey is unnecessary
- o EXXON to supply another copy of the Texaco "Exhibit J" report for this site

1039 2225 Telegraph Ave., Oakland Texaco

- o Texaco lead - no updates by EXXON

1068 6630 East 14th Street, Oakland EXXON

- o former Texaco site - EXXON will send another Texaco "Exhibit J" report
- o should noted Texaco report indicate a release during Texaco's tenure, **need to identify Texaco as additional RP**
- o downgradient well MW-5 had only one "hit" in October 1992, and none since - may be from cross-contamination during sampling
- o same (apparent) occurrence in cross-gradient well MW-7
- o "sheen" found in well MW-2, yet sampled anyway. Low dissolved concentrations (total TPH of 15 ppm) lead RESNA to conclude that sheen was not a result of HCs, but rather some other unknown organic compound. [FP not expected until conc. > 50-100 ppm]
- o SWI work plan for additional on-site assessment to be submitted shortly, which will include 5 borings/Hydropunches with 3 to be converted to SVE test wells

136 720 High Street, Oakland EXXON

- o interceptor trench in design/engineering phase now, and will run along south/SW/west site boundaries. Trench forecast to be completed prior to 1994
- o southern off-site wells still in City of Oakland permitting process
- o treatment of collected GW to (likely) include thermal destruction and GAC polishing prior to discharge. Trench to include vapor extraction plumbing, as well, to address need to remove potential free phase product from trench
- o Timeline to be developed by RESNA
- o upgradient contributory source not considered significant at this time

1127 8008 Mountain Blvd., Oakland EXXON

- o EXXON to supply copies of (copious) pre-April 1992 files
- o EXXON considers this a low priority case - will likely be proposing site closure shortly
- o EXXON will conduct well survey in area to determine if pumping, etc., could explain wild fluctuations in GW levels found in OW-6

EXXON COMPANY, U.S.A.

POST OFFICE BOX 4032 . CONCORD, CA 94520-2032
ENVIRONMENTAL ENGINEERING
MARLA D. GUENSLER
SENIOR ENVIRONMENTAL ENGINEER
(510) 246-8776
(510) 246-8798 FAX

STID
136

April 16, 1993

Via Facsimile/Original Via Overnight Mail

Mr. Barney Chan
Alameda County Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Subject: Former Exxon RAS #7-3006, 720 High Street, Oakland, California

Dear Mr. Chan:

Attached for your review and comment are two documents as listed below:

1. Letter Response to Alameda County Health Care Services Agency letter dated March 5, 1993.
2. Letter Report entitled Limited Record Search at Exxon Station 7-3006.

Both letters were prepared by RESNA Industries, Inc., of San Jose, California.

The first listed document clarifies questions raised by Alameda County's letter to Exxon dated March 5, 1993. The second report details the results of a records search completed for the area surrounding the Former Exxon Station. The investigation was limited to files from the Alameda County Department of Environmental Health, the California Regional Water Quality Control Board, and the City of Oakland Fire Department, as well as Pacific Gas and Electric, East Bay Municipal Utilities District, City of Oakland Office of Public Works, and Pacific Bell. It was based on historical usage of the property and its surrounding properties.

Although the letter of response commits a date of April 19, 1993 for the receipt of the well installation, vapor extraction test, and pumping test report, it will be delivered to Alameda County on Tuesday, April 20, 1993.

Exxon would like to meet with the Alameda County Department of Environmental Health after you have had the opportunity to review the forthcoming reports to discuss alternatives for the site. Exxon or RESNA will call to schedule a meeting at your convenience if you agree to do so.

Upon your review of the letter and report, should you have any questions or comments, or require additional information, please do not hesitate to contact me at the above referenced report.

Sincerely,



Marla D. Guensler

Attachments

c - w/attachments:

Mr. Richard Hiett - San Francisco Bay Region CRWQCB

w/out attachments:

Mr. Marc Briggs - RESNA Industries, Inc., San Jose

MDG/mdg



3315 Almaden Expressway, Suite 34
San Jose, CA 95118
Phone: (408) 264-7723
FAX: (408) 264-2435

March 23, 1993
0315MGUE
130006.02

Ms. Marla D. Guensler
Exxon Company, U.S.A.
P.O. Box 4032
2300 Clayton Road
Concord, California 94520-2032

Subject: Response to the Alameda County Health Care Services Agency letter dated March 5, 1993 concerning Evaluation of Addendum One to the Interim Groundwater Remediation Work Plan for 720 High Street, Oakland, California.

Ms. Guensler:

As requested by Exxon Company, U.S.A. (Exxon), this letter is RESNA Industries Inc. (RESNA) response to the subject letter submitted by Barney M. Chan of Alameda County Health Care Services Agency (ACHCSA) and hopefully will help clarify some of Mr. Chan's concerns. His concerns are listed in bold letters below followed by a brief discussion. Each item below was discussed by telephone conversation on March 19, 1993 between Mr. Chan of ACHCSA and Marc Briggs of RESNA.

Task 1: Passive Free Phase Gasoline Hydrocarbon Recovery System

Addendum One to the Interim Groundwater Remediation Work Plan, dated January 18, 1993 proposed that a Passive Free Phase Gasoline Hydrocarbon Recovery System to be installed in monitoring wells MW-2 through MW-4. However, during the monthly monitoring conducted on February 18, 1993, no noticeable free phase gasoline hydrocarbons or gasoline hydrocarbon sheen was noticed on well MW-3, free phase gasoline hydrocarbons were observed in monitoring well MW-2, and a gasoline hydrocarbon sheen was observed in monitoring wells MW-4 and MW-6. Based on these observations, the Passive Free Phase Gasoline Hydrocarbon Recovery System was installed in monitoring wells MW-2, MW-4, and MW-6 as an interim means of source removal and migration control. RESNA will continue with monitoring and subjective analysis groundwater in the monitoring wells on a monthly basis.

Response to the March 5, 1993 ACHCS letter
Former Exxon Station 7-3066, Oakland, California

March 23, 1993
130006.02

Task 2: Well Installation

Addendum One to the Interim Groundwater Remediation Work Plan proposed drilling two exploratory borings (B-33 and B-34) downgradient of the former gasoline underground storage tanks to delineate further the vertical and lateral extent of gasoline and diesel hydrocarbons and the potential subsurface pathways beneath the site and the construction of two four-inch diameter polyvinyl chloride (PVC) groundwater monitoring wells (MW-16 and MW-17) in the borings. Cal Trans permitting is in progress for the installation of these wells, and the installation of the wells may not occur by the report deadline. RESNA will update Mr. Chan on the permitting progress of these wells in our quarterly reports. Additionally, based on the results of the vapor extraction test, the pumping tests, and quarterly sampling, RESNA may propose not drilling the wells based on alternative viable technologies, and criteria specified in the California Region Water Quality Control Board (CRWQCB) Amendment to the Basin Plan, dated October 21, 1992.

Addendum One to the Interim Groundwater Remediation Work Plan also proposed drilling three borings (B-35 through B-37) in the vicinity of the former USTs, to delineate further the lateral extent of gasoline and diesel hydrocarbons in soil and the potential subsurface pathways beneath the site and the construction of three four-inch diameter PVC vapor extraction wells (VE-1 through VE-3) in the borings. The three vapor wells were installed on February 11, 1993, and the vapor extraction test was performed on February 18, 1993.

Task 3: Pumping Test

A step-drawdown and a pumping and recovery test was performed on February 25-26, 1993 utilizing monitoring well MW-13 to evaluate sustainable pumping rates and capture radii for design of a groundwater remediation system. Static background monitoring was performed on March 10 and 11, 1993, on monitoring well MW-8. Well MW-13 was chosen as the extraction well for the pumping test because of its construction, the locations of several observation wells in the vicinity, and optimum pumping and recovery data obtained from the quarterly sampling reports.

Quarterly monitoring and sampling was performed on March 10 and 11, 1993. The results of the quarterly monitoring will verify the constituents previously detected in well MW-1 and will be reported in the near future.

Response to the March 5, 1993 ACHCS letter
Former Exxon Station 7-3066, Oakland, California

March 23, 1993
130006.02

Task 4: Preliminary Time Schedule

As previously mentioned, the vapor extraction test was performed on February 18, 1993, and a pumping and recovery test was performed on February 25-26, 1993. Mr. Chan's March 5, 1993 letter mentions submittal of the report describing these tasks six week after completion of the pumping tests (April 8, 1993) and nine weeks after completion of the vapor extraction test (April 29, 1993). Additionally, Mr. Chan's March 5, 1993 letter requests preparation of a Work Plan based on the test results. Preliminary results of the vapor extraction test and the pumping test indicate that vapor extraction or groundwater extraction may not be viable remediation alternatives at this site. The final report will recommend alternative remedial technologies at the site, and the preparation of the Work Plan for alternative remedial technologies will be submitted after the feasibility of the alternatives is explored in more detail. These recommendations may propose no treatment, or containing and treating based on criteria specified in the CRWQCB Amendment to the Basin Plan, dated October 21, 1992. If permitting of the offsite wells is not complete by the end of March, the results of the vapor well installation, vapor extraction test, and pumping test will be reported under separate cover to Mr. Chan by April 19, 1993.

Task 5: Possible Upgradient Sources Of Contamination

RESNA has conducted a records search of the surrounding area limited to available information from the files of the ACHCSA and the CRWQCB. The records search focused on the historical usage of the surrounding area, and previous environmental work performed in the vicinity of the site. The results of the record search will be reported under a separate cover in the near future.

I hope this clarifies any concerns Mr. Chan had regarding Addendum One to the Interim Groundwater Remediation Work Plan. If you have any questions or comments, please contact me at (408) 264-7723.

Sincerely,
RESNA Industries Inc.



Marc A. Briggs
Project Geologist

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

March 5, 1993
StID # 136

Exxon Co. USA
Ms. Marla Guensler
P.O. Box Box 4032
Concord CA 94524-2032

**Re: Evaluation of Addendum One to the Interim Groundwater
Remediation Work Plan for 720 High St., Oakland 94601**

Dear Ms. Guensler:

Our office has received the above referenced addendum to the Interim Groundwater Work Plan provided by Mr. Marc Briggs of RESNA. We have also received the fourth quarter 1992 groundwater monitoring report. Upon review of the work plan addendum, I have the following comments to the proposed tasks:

1. Task 1 is acceptable as an interim measure to remove free product in monitoring wells MW-2 through MW-4. It was noticed in the fourth quarter monitoring report that a sheen was appearing in MW-8, MW-12 and MW-13. You should also consider adding a recovery system to these wells if free product starts to appear.
2. Task 2, the installation of two off-site wells at their proposed locations is acceptable. Recall, these wells were requested during a January 22, 1991 meeting at our office. The vapor extraction wells proposed are also acceptable. If the vapor extraction test indicates that this is a viable method, you should add additional vapor extraction wells to address the other areas which have documented petroleum contamination. These areas should include a wider area around the former service island, near the former used oil tank and near B-14. Please keep our office updated as to the progress of obtaining off-site drilling permission in your quarterly reports.
3. Please identify the wells which you will be performing pump tests on. All wells containing free product or sheen must be considered for extraction wells or they should at least fall within the anticipated radius of influence of the pumping well(s). Our office is concerned that in the 12/92 monitoring event TPHg, TPHd and BTEX was found in MW-1, the off-site well, for the first time in a long while. This may be an indication that the hydrocarbon plume has migrated off-site.

Ms. M. Guensler
StID# 136
720 High St.
March 5, 1993
Page 2.

4. Our office has reviewed the Preliminary Time Schedule for the proposed tasks. We would like to see additional tasks based on the results of the vapor extraction and pump tests. The proposal calls for the completion of a report six weeks after completing the pump tests and nine weeks after completing the vapor extraction test. Prior to issuing the report, you should be preparing a work plan for installing a groundwater treatment system and/or a vapor extraction system, or proposing alternate remedial techniques based on your test results. Assuming the tests are favorable, all permit applications should be made and the status of permits should be incorporated in your quarterly reports. Please comment on to the feasibility of performing these additional tasks prior to final report submission.

5. In respect to possible upgradient sources of contamination, our office has reopened the site investigation performed at 752 High St. You should be receiving a copy of the letter sent to the former property owner, Mr. Roy Hatton. You are encouraged to communicate with him to resolve the issue of the soil and groundwater contamination being found either in or around MW-14.

You may proceed with the proposed work plan addendum but please provide a written comment to the above issues **within 30 days** of receipt of this letter.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
M. Briggs, RESNA, 3315 Almaden Expressway, Suite 34, San
Jose, CA 95118
V. Chu, 720 High St., Oakland CA 94601

1-720WPadd

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
LOCAL OVERSIGHT PROGRAM

M E M O R A N D U M

DATE: February 16, 1993

TO: LOP staff

FROM: Scott

SUBJ: EXXON-lead site investigation/remediation status

I received a call today from Marla Guensler, a construction and maintenance engineer for EXXON Company, U.S.A. Ms. Guensler is responsible for managing many (if not all) of the UST leak sites we deal with in this office on behalf of EXXON. She inquired into the status of EXXON-lead investigation/remediation sites within Environmental Health's jurisdiction. This would exclude, of course, sites within those cities which are responsible for their own oversight, such as Fremont. As you all may be aware, one of several conditions of the settlement negotiated between EXXON and Alameda County compels EXXON to rigorously pursue UST leak investigations and cleanups.

Ms. Guensler and I are planning to meet during the first or second week of March to discuss this issue should there be a perception by this office that not all is going as it should. Please take a few minutes this week to jot down in the space provided below the STID #'s, addresses, and a brief couple of words describing their status, and whether some issues should be raised with Ms. Guensler.

(This is "the space provided below.") STID 136 730 High St
After the Dec 15, 1992 meeting w/ Ms Guensler, (Mark Briggs + Bruce Maeda of RESNAI)
Exxon was to submit a revised time schedule for ① installing offsite well(s) ② Perform GW
extraction tests ③ installing 3 vapor extraction wells & ④ issuance of a report. We have
yet to receive the revised time schedule. Their intention to be free product in MW's 2, 3, 4
on South side of property & MW-1 the offsite well down gradient to these wells detected
cc: Mark Thomson 0.170 mg/l TPH₅ in 12/8/92 spring after a series of ND.
Ed Howell + 0.01 mg/l Benzene previously.

Barney

EXXON COMPANY, U.S.A.

POST OFFICE BOX 4032 . CONCORD, CA 94524-2032

ENVIRONMENTAL ENGINEERING

MARLA D. GUENSLER
SENIOR ENVIRONMENTAL ENGINEER
(510) 246-8776

November 5, 1992

Mr. Barney M. Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Subject: Former Exxon #7-3006; 720 High Street, Oakland, CA
STID # 136

Dear Mr. Chan:

This letter is written in response to the Alameda County letter to Exxon dated October 29, 1992 discussing the above referenced site. It is Exxon's understanding that this site has been transferred to the Local Oversight Program, and will respond to future invoices related to such.

On October 30, 1992, Exxon forwarded a quarterly groundwater monitoring report to Alameda County Health Agency for review. The submittal letter for the report stated that an interim floating product recovery system was to be installed in the near future in monitoring wells MW-2, MW-3, and MW-4. This was one of the requests made in your letter, however, in the September monitoring and sampling event, all three wells contained only a sheen. Therefore, it is not feasible at this time to install the automated skimmers as planned. However, if free product measurements increase in any of the wells, Exxon will proceed with the installation of a floating product recovery system.

Exxon has contracted with RESNA Industries, Inc., of San Jose, California to complete an addendum to the Interim Groundwater Remediation Work Plan for submittal to your office by December 3, 1992, thirty days from the receipt of your letter. This work will include the installation of two additional wells, and will include a tentative schedule for proceeding with the plan.

Exxon has also contracted with RESNA to complete a records search of all Regional Water Quality Control Board and Alameda County Department of Environmental Health files for potential offsite contributors to the property, and historical use of the property. A copy of the report detailing information found in the file search will be forwarded to your office.

Exxon will be submitting the third quarter ground water monitoring report to your attention in the near future. This and the work plan addendum should assist in clarifying some of the items discussed in your letter.

If you have any questions, or require additional information, please do not hesitate to contact me at the above listed phone number.

Sincerely,

Marla D. Guensler

c - Mr. M. A. Briggs - RESNA Industries, Inc., San Jose, CA
Mr. Richard Hiett - San Francisco Bay RWQCB
Mr. V. A. Sevier
Mr. E. E. Villasenor

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

October 29, 1992
STID # 136

Exxon CO. USA
Attn: Ms. M. Guensler
P.O. Box 4032
Concord CA 94524-2032

Re: Request for Workplan Addendum for Former Exxon RAS 7-3006,
720 High St., Oakland CA 94601

Dear Ms. Guensler:

Please be advised that the oversight for the subsurface investigation being performed at the above site has been transferred to the Local Oversight Program (LOP) section of Alameda County's Hazardous Materials Division. You have been notified of this through a "Notice of Requirement to Reimburse" letter recently sent to your attention. Your new contact person within this group is the undersigned Hazardous Materials Specialist.

Upon review of this site's extensive files, it appears that the work proposed in several time schedules, the latest being that found in the October 10, 1991 **Interim Groundwater Remediation Work Plan**, is not on schedule. The files indicates that this site was given a high priority on the list of Exxon sites within Alameda County. This list was provided by Mr. Gary Gibson of Exxon in his letter to Mr. Scott Seery of our office. In fact, this site is number 7 among the 35 listed sites.

I have reviewed the January 22, 1991 notes of the meeting with Mr. Gibson and members of our office discussing this site. As you are aware, the history of this site is very complex. After the removal of four underground tanks in 1987, the excavation pit was allowed to stay open for three years and stockpiled soils were also kept on-site for at least this long. There is some difficulty in explaining the significant diesel contamination being found, since diesel fuel has never been sold at this site. Previous site activities such as acting as a former Standard Oil bulk terminal and offsite upgradient businesses which used various hazardous chemicals including fuels also complicates the issue. What is clear, however, is that there appears to be extensive soil and groundwater contamination onsite in the western and southern areas.

Ms. M. Guensler
Former Exxon Station 7-3006
STID # 136
October 29, 1992
Page 2.

It is also clear that most if not all of the petroleum hydrocarbon contamination found originates from this site. During this 1991 meeting, these conditions were acknowledged and two additional offsite wells, to the west and to the south of the site, were requested by our office in order to evaluate the extent of groundwater hydrocarbon plume. To this date, these wells have not been installed. An **Estimated Schedule of Work** dated October 3, 1990 was submitted by Applied GeoSystems to Mr. Gary Gibson which called for the installation of a remediation system by the end of April 1991. Obviously this schedule was not adhered to. A **Preliminary Schedule of Proposed Remedial Action** was provided in the October 10, 1991 **Interim Groundwater Remediation Work Plan** provided by Resna. Recall, this work plan called for the installation of a groundwater extraction system using carbon canisters and final discharge of treated waters to the sanitary sewer. The preliminary schedule was divided into four sections and an approximate timeframe for each activity's duration. These four sections included: Work Plan for Recovery Well Installation, Engineering Design, Permitting and Construction. The expected timeframe for these actions is 11 months, therefore we would anticipate the construction of the treatment system at approximately October 1992. From the most recent Quarterly Status Report for July-September 1992 it does not appear that work is being performed in accordance to this schedule.

In the event that Exxon was awaiting written approval from our office, I'm sure you are aware that Section 2711 (e) of Article 11 of Title 23 of the California Code of Regulations states that implementation of a workplan may begin sixty (60) calendar days after submittal, unless the responsible party is otherwise directed in writing by the regulatory agency. Therefore this work plan may proceed without written approval.

You are at this time directed to submit a workplan addendum which includes an updated schedule which accurately reflects the anticipated timeframe for the four sections of the previous October 91 workplan. Please provide such a workplan within **30 days** of receipt of this letter. In addition, review of the files generated the following County concerns:

1. It appears that since 5/88, (over four years), there has been free product appearing in Monitoring Wells 2, 3 and 4 and that the only "remediation" performed to date has been hand bailing.

Ms. M. Guensler
Former Exxon Station 7-3006
STID # 136
October 29, 1992
Page 3.

1. (cont.) This is **not** an adequate method to remove free product. Assuming that the start-up of the remediation system is still over one year away, an interim remedial system such as an automated skimmer is requested for those wells showing free product.

2. Your July-September 1992 quarterly status report states under "Work to be Performed Next 12 Months", that you will continue quarterly monitoring to evaluate the trends of gasoline and diesel concentrations and groundwater gradient. There is no mention of starting any of the work proposed in the October 19, 1991 remediation work plan. In addition to providing your workplan addendum, as requested above, ~~and~~ please state the current status of each proposed action and the proposed future actions in all subsequent quarterly status reports. You should also include the following information in these reports:

- * site map delineating contamination contours for soil and groundwater based on the most recent data
- * historical data of groundwater elevations for all wells
- * tabulation of analytical results of all previous samplings

3. As mentioned previously, a minimum of two additional offsite wells was requested during the January 22, 1991 meeting at our office. Please provide a schedule for the installation of at least two offsite wells to further determine the extent of the soil and groundwater plume.

4. There has been mentioned on several occasions the potential of offsite migration of hydrocarbon contamination onto this site, particularly from the former dry-cleaning and auto parts facilities to the north. Please be advised that in order to prove this theory, you must provide an acceptable work plan that either our office or that of the Regional Water Quality Control Board (RWQCB) concurs with. It is noted that MW-14, the down-gradient well to the former offsite UST excavation pit has had low TPHg and BTEX concentrations.

5. Reports have stated that there are three major areas of soil and groundwater contamination, namely around the former service islands, on the southwestern edge of the site downgradient to the original tank excavation and around the former waste oil tank. The proposed extraction well locations apparently will not address the groundwater contamination in this area.

Ms. M. Guensler
Former Exxon Station 7-3006
STID #136
October 29, 1992
Page 4.

5. (cont.) Note that MW-7, the downgradient well to the former waste oil tank, has historically had levels of benzene from 258 ppb to the last reported amount of 390 ppb. What is proposed to remediate the groundwater in this area?

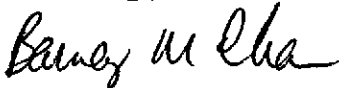
6. Considerable soil contamination still exists on-site. This contamination continues to contribute to the groundwater contamination. Please state what will be done to determine the limits and remediate the high soil concentrations of petroleum hydrocarbon.

Your workplan addendum along with your response to the issues mentioned should be submitted to our office **within 30 days** of receipt of this letter.

This letter constitutes a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by either this office or that of the RWQCB.

You may contact me at (510) 271-4530 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
E. Howell, files
V. Chu, 720 High St Oakland CA 94601
WP-720-Add

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

Hazardous Materials Inspection Form

II, III

Site ID # _____ Site Name Vic Chu Today's Date 8/21/91

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 720 High St.
 City Oakland Zip 94601 Phone 533-6006

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

Containment sumps passed the water test.

III. UNDERGROUND TANKS (Title 23)

- General
- ___ 1. Permit Application 25284 (H&S)
 - ___ 2. Pipeline Leak Detection 25292 (H&S)
 - ___ 3. Records Maintenance 2712
 - ___ 4. Release Report 2651
 - ___ 5. Closure Plans 2670

- Monitoring for Existing Tanks
- ___ 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
 - Semi-annual groundwater
 - One time soils
 - 3) Daily Vadose
 - One time soils
 - Annual tank test
 - 4) Monthly Gndwater
 - One time soils
 - 5) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det.
 - Vadose/gndwater mon.
 - 6) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - 7) Weekly Tank Gauge
 - Annual tank testing
 - 8) Annual Tank Testing
 - Daily Inventory
 - 9) Other

- ___ 7. Precis Tank Test 2643
 - Date: _____
- ___ 8. Inventory Rec. 2644
- ___ 9. Soil Testing. 2646
- ___ 10. Ground Water. 2647

- New Tanks
- ___ 11. Monitor Plan 2632
 - ___ 12. Access. Secure 2634
 - ___ 13. Plans Submit 2711
 - Date: _____
 - ___ 14. As Built 2635
 - Date: _____

Rev 6/88

Contact: Mark D East
 Title: Contractor
 Signature: Mark David East

Inspector: Carry Sefo
 Signature: [Signature]

II, III

CITY OF OAKLAND
REPORT OF FIRE INSPECTION

ENGINE CO.

ADDRESS 720 High St. 205

NAME _____

GENERAL INSPECTION PERMIT OTHER HAZARD NOTED HAZARD ABATED

NOTICE LEFT LETTER 1st NOTICE 2nd NOTICE FINAL

DATE	VIOLATION	O.F.C.	CONTACTED
2-19-91	TESTED ALL SEAMONKAM CONTAINMENT PIPING AT 5lbs. - SCAPED ALL JOINTS. NO LEAKS OBSERVED.		

REINSPECTION WILL BE MADE WITHIN _____ DAYS.

FIRE PREVENTION BUREAU — PHONE 273-3851

INSPECTOR [Signature]

CITY OF OAKLAND
REPORT OF FIRE INSPECTION

ENGINE CO.

ADDRESS 720 HIGH ST.

205

NAME SERVICES STATION

GENERAL INSPECTION PERMIT OTHER HAZARD NOTED HAZARD ABATED

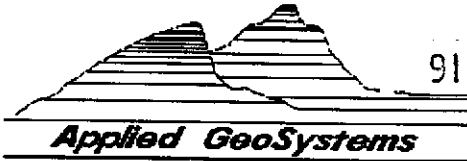
NOTICE LEFT LETTER 1st NOTICE 2nd NOTICE FINAL

DATE	VIOLATION	O.F.C.	CONTACTED
8-7-91	TESTED AND PASSED ALL PRIMARY PIPING FUEL LINES, VENT LINES, VAPOUR RECOVERY LINES.		
	SCAPED ALL JOINTS AND SPICES NO LEAKS OBSERVED		

A REINSPECTION WILL BE MADE WITHIN ~~_____~~ DAYS

FIRE PREVENTION BUREAU - PHONE 273-3851

INSPECTOR [Signature]



91 JUN 16 AM 11:05

TRANSMITTAL

42501 Albrae Street, Suite 100, Fremont, California 94538
Phone: (415) 651-1906
Fax: (415) 651-8647

TO: Mr. Larry Seto
Alameda County Health Care Services
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

DATE: 06-13-91
PROJECT NUMBER: 87042-9
SUBJECT: Exxon Station No. 7-3006

FROM: Rodger Witham
TITLE: Project Manager

WE ARE SENDING YOU:

COPIES DATED	DESCRIPTION
1 06/13/91	Check for refund/deposit account, Exxon Station No. 7-3006, 720 High Street, Oakland, California

THESE ARE TRANSMITTED as checked below:

- For review and comment Approved as submitted Resubmit ___ copies for approval
 As requested Approved as noted Submit ___ copies for distribution
 For approval Return for corrections Return ___ corrected prints
 For your files

REMARKS:

As authorized by Mr. Gary Gibson of Exxon Company, U.S.A.

Distributions: 1 to AGS project file no. 87042-9


for Ashraf Mirza, Branch Manager

Applied GeoSystems
42501 Albrae St. Fremont, CA 94538

0002036

DESCRIPTION	VENDOR NO.	VOUCHER NO.	AMC		PROJECT NO.	ACCOUNT NO.
Site address: 720 High Street Oakland, CA Job number: 87042.09						

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

May 28, 1991

ATTN: Gary Gibson

Exxon
P. O. Box 4032
Conord, CA 94524-2032

RE: Project # 309A - M
at 720 High St. in Oakland 94601

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$1,074.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Larry Seto at (415) 271-4320.

Sincerely,


Edgar B. Howell III, Chief
Hazardous Materials Division

EH:lp

cc: files

MEMORANDUM

DATE: OCTOBER 24, 1990
 TO: ALL SPECIALISTS, SUPERVISOR, CHIEF
 FROM: SCOTT
 SUBJECT: EXXON COMPLIANCE MEETING SCHEDULE

As you may all likely be aware, recently The Alameda County District Attorney's Office reached an out-of-court settlement with EXXON Company, U.S.A. The conditions of this settlement include both monetary and compliance elements. Monthly meetings will be held in our conference room during which the compliance status of two (2) stations will be discussed by Mr. Gary Gibson, and others, representing EXXON. The meetings will be attended by individuals representing the agencies of jurisdiction for the sites to be discussed, and will be held on the last Tuesday of each month. The exceptions will be the first meeting, scheduled for November 2, and the December meeting, moved up to the 18th so as not to conflict with the Christmas holiday.

Please find attached information regarding the scheduled meetings, including a prioritized listing of sites and meeting dates. Please note those in your district, and plan on attending the scheduled meetings.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

September 26, 1990

Mr. Gary Gibson, Sr. Environmental Engineer
Exxon
P.O. Box 4032
Concord, CA 94524-2032

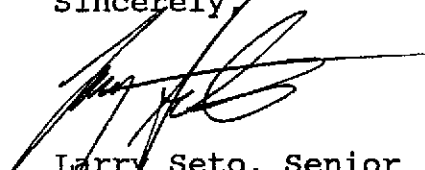
RE: 720 High Street, Oakland, CA

Dear Mr. Gibson:

I have reviewed your workplan dated June 26, 1990, for sampling of soil from the new tank pit at the above site that was prepared by Applied GeoSystems. This workplan is acceptable with the additional requirements that a minimum of one soil sample be taken every 20 square feet from the walls and bottom of the pit.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,


Larry Seto, Senior
Hazardous Materials Specialist

LS:mnc

cc: Victor Chu, Exxon
RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Charlene Williams, DOHS
JoEllen Kuszmaul, Applied GeoSystems
Files

Press [ESC] for the menu

ENRUCIO UPDATED

UNDERGROUND STORAGE TANK CLEANUP SITE

-LOP:A-TRemov:--SLIC:-

SITE ID: 136	SOURCE OF FUNDS: F	SUBSTANCE :8006619
SITE NAME: Former Exxon RAS 7-3006		DATE REPORTED :05/01/1987
SITE ADDRESS: 720 -0 High St		DATE CONFIRMED:05/01/1987
CITY: Oakland	ZIP CODE: 94601	MULTIPLE RPs : Y

CASE TYPE: S CONTRACT STAT: 4 PRIORITY: -0- DATE ER:-0-

RP SEARCH : S		DATE END: 10/27/1992
PRELIM ASSESSMENT : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL INVEST : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL ACTION : -	DATE BEGIN: -0-	DATE END: -0-
POST REMED MONITOR: -	DATE BEGIN: -0-	DATE END: -0-

ENFORCEMENT TYPE: 1	DATE ENFORCEMENT ACTION TAKEN: 10/27/1992
LUFT CATEGORY: -0-	CASE CLOSED: - DATE CASE CLOSED: -0-
DT EXC START : 04/29/1987	REMEDIAL ACTIONS TAKEN: ED

PgDn for Screen #2

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
 Form: SITE Table: SITE Field: Source Page: 1

STID: 136

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

IN-HOUSE MANAGEMENT:

RISK ASSESSMENT :-0-	LOC-CleanUp Fund? -0-
DATE LAST CORSP :07/14/1999	INSPECTOR INIT: BC

CONTACT/RESPONSIBLE PARTY INFORMATION:

RP #1: CONTACT: M. Guensler	RP COST: \$0.00
RP COMPANY NAME: Exxon Co. U.S.A	Ph: -0-
ADDRESS: P. O. Box 4032	
CITY/ST/ZIP: Concord, Ca 94524-2032	

COMMENT: MTBE=21ppb, limited to onsite

PgUp For Screen #1;PgDn For More RP'S

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
 Form: SITE Table: SITE Field: FlagDate Page: 2

RP seq#: 2-9

ADDITIONAL RP'S -SCREEN # 3

RP #2		
CONTACT NAME: Mr. Victor Chu		Ph: -0-
COMPANY NAME: n/a		

ADDRESS: 3915 Forest Hill Ave.
CITY/ST/ZIP: Oakland Ca 94602

RP #

CONTACT NAME:

Ph:

COMPANY NAME:

ADDRESS:

CITY/ST/ZIP:

RP #

CONTACT NAME:

Ph:

COMPANY NAME:

ADDRESS:

CITY/ST/ZIP:

PgUp for Screen #2;

<F7>/<F8> for Next / Previous RP

[ESC] Done

[F2] Clear field

[Shift-F2] Clear to end

[Shift-F10] More

Form: SITE

Table: RPs

Field: RPseq#

Page: 3