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January 12, 1995

#1453

Joseph S. Moran, Esq.
Assistant General Counsel - Environmental
American National Can Company
Mail Suite 14C
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Subject: Area 3 Product Monitoring - Status Update
American National Can Company
Former Oakland, California Facility

Dear Mr. Moran:

On October 28, 1994, Rust Environment & Infrastructure, Inc. (RUST) completed a report entitled "Area 3 Monitoring Results" for the subject site. That report included the results of monitoring and removal of free floating product from selected Area 3 wells. Since the completion of that report, RUST has discontinued the periodic removal of product from Area 3 wells, but the monitoring has continued. This letter provides an update of data gathered as part of the Area 3 product monitoring program.

Attached Table 1 is the product thickness summary table included in the October 28, 1994 report that has been updated with measurements recorded through January 4, 1995. The attached chart is an updated version of that provided in the October report. A discussion of the monitoring results obtained since October 28 is presented in the following paragraphs.

GROUNDWATER ELEVATION CHANGES

From October 28 to November 4, 1994, the groundwater elevation in Area 3 continued a steady seasonal decrease. Over the weekend on November 5-6, several inches of rain fell in the Oakland area and groundwater elevations in Area 3 increased by as much as 2.5 feet over that weekend. Groundwater elevations have subsequently continued a gradual increase in response to regular precipitation events. The groundwater elevation changes of well GW-2R, shown on the attached chart, reflect these significant changes.

PRODUCT THICKNESS

Monitoring Well MW-2:

The product thickness in well MW-2, through November 4, 1994, remained consistent with data recorded prior to October 28. Since November 7, product has generally not been present in the well. As groundwater elevations in Area 3 dramatically increased from November 4 to November 11, 1994, the product in well MW-2 completely disappeared. Product has not been observed in this well until a thin layer (0.01 foot) was observed during the most recent measurement. These results confirm the summary in the October 28, 1994 report that product is only present in this well during the latter stages of the dry season and early stages of the wet season (August through December). It should be noted that the MW-2 water level has always been at least 1 foot below the top of the well screen, even during the recent high groundwater elevations.

Monitoring Well MW-5:

A thin (0.02 feet) layer of product was present on this well during the initial three monitoring events following the October 28 report. However, product has not been present since November 7, 1994. We believe that these results reflect both the increased groundwater elevations in Area 3 and the recent product removal efforts at this well.

Monitoring Well GW-2R:

On December 5, 1994, the product thickness in well GW-2R was 0.07 feet, the thinnest it has been since the program began in August. The thickness decreased from 0.35 feet on November 4 to 0.13 feet on November 7, as groundwater levels rose markedly. It is apparent, as shown on the product thickness chart, that the increased water levels have caused the abrupt decrease in product thickness, although it is also shown that the product removal was successful in decreasing product thickness in the vicinity of this well.

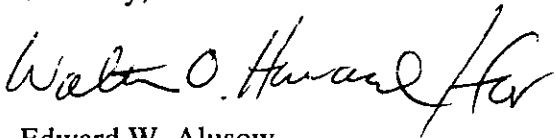
SUMMARY

As a result of the decrease in product thicknesses in Area 3 wells, and consistent with our recommendations in our October 28 report, we have stopped the tri-weekly product monitoring and removal program, effective December 5, 1994. We propose to continue the monitoring efforts on a monthly basis and will continue to record data as in the past. We will immediately inform you in the event that significant changes in product thicknesses occur that might warrant further schedule changes.

Joseph S. Moran, Esq.
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Please contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward W. Alusow".

Edward W. Alusow
Senior Project Manager

Attachments

cc: J. Peters (ANC)
E. Rawlings (ANC)
J. Kessler (HSA)
R. Creps (PES)
J. Renauer (KMART)
D. Bruegel., Esq. (Dickenson, Wright)
B. Chan (ACDEH)
R. Arulananthum (SFBRWQCB)

Table 1

Former American National Can Company Facility
 Oakland, California
 Summary of Product Thickness Measurements - Area 3

	GW-1R	GW-2R	MW-2	MW-3	MW-4	MW-5
8/3/94	0	0.59	--	--	--	0.12
8/5/94	--	0.50	0.10	0.02	--	0.11
8/8/94	0.00	0.52	0.12	0.03	0.00	0.08
8/11/94	--	0.49	0.06	0.02	--	0.08
8/12/94	--	0.38	0.10	0.01	--	0.03
8/17/94	--	0.31	0.09	0.02	--	0.00
8/19/94	--	0.61	0.12	0.01	--	0.00
8/22/94	0.00	0.55	0.09	0.01	0.00	0.00
8/24/94	--	0.56	0.08	0.02	--	0.00
8/26/94	--	0.43	0.08	0.00	--	0.00
8/29/94	0.00	0.55	0.08	0.00	0.00	0.00
8/31/94	--	0.53	0.08	0.00	--	0.00
9/2/94	--	0.52	0.14	0.00	--	0.00
9/6/94	0.00	0.55	0.10	0.00	0.00	0.00
9/7/94	--	0.50	0.17	0.00	--	0.00
9/9/94	--	0.42	0.09	0.00	--	0.00
9/11/94	0.00	0.40	0.08	0.00	0.00	0.00
9/14/94	--	0.34	0.02	0.00	--	0.00
9/16/94	--	0.39	0.00	0.00	--	0.00
9/19/94	0.00	0.35	0.06	0.00	0.00	0.00
9/21/94	--	0.29	0.09	0.00	--	0.00
9/23/94	--	0.28	0.15	0.00	--	0.02
9/26/94	0.00	0.37	0.05	0.00	0.00	0.03
9/28/94	--	0.27	0.10	0.00	--	0.01
9/30/94	--	0.31	0.07	0.01	--	0.02
10/3/94	0.00	0.32	0.12	0.02	0.00	0.01
10/5/94	--	0.27	0.13	0.01	--	0.02
10/7/94	--	0.30	0.11	0.03	--	0.05
10/10/94	0.00	0.32	0.13	0.01	0.00	0.02
10/12/94	0.00	0.30	0.11	0.02	0.00	0.02
10/14/94	--	0.24	0.11	0.00	--	0.02
10/17/94	0.00	0.33	0.11	0.01	0.00	0.02
10/19/94	--	0.29	0.11	0.01	--	0.02
10/21/94	--	0.25	0.08	0.02	--	0.03
10/24/94	0.00	0.19	0.10	0.02	0.00	0.02
10/26/94	--	0.21	0.09	0.02	--	0.07
10/28/94	--	0.30	0.06	0.03	--	0.05

Notes:

1. All thicknesses are expressed in feet.
2. -- Indicates that no measurement was taken.

Table 1

Former American National Can Company Facility
Oakland, California
Summary of Product Thickness Measurements - Area 3

	GW-1R	GW-2R	MW-2	MW-3	MW-4	MW-5
11/16/94	--	0.16	0.00	0.00	--	0.00
11/18/94	--	0.21	0.00	0.00	--	0.00
11/21/94	0.00	0.09	0.00	0.00	0.00	0.00
11/23/94	--	0.13	0.00	0.00	--	0.00
11/28/94	0.00	0.18	0.00	0.00	0.00	0.00
12/2/94	--	0.09	0.00	0.00	--	0.00
12/5/94	0.00	0.07	0.00	0.00	0.00	0.00
1/4/95	--	0.08	0.01	0.01	--	0.01

Notes:

1. All thicknesses are expressed in feet.
2. -- Indicates that no measurement was taken.

Former American National Can Company Facility
Oakland, California

Summary of Product Thickness Measurements - Area 3

