

EXHIBIT 8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

In the Matter of:)
)
) U.S. EPA Docket No.
Chevron U.S.A. Inc.,) RCRA-7003-09-2000-0002
Exxon Mobil Corporation,)
Atlantic Richfield Company,)
Conoco, Inc., Kayo Oil Company,)
Douglas Oil Company of)
California, UNOCAL Corporation,)
Mobil Oil Corporation,)
Tosco Corporation,)
Thrifty Oil Company)
Best California Gas Ltd.,)
Kazuho Nishida,)
and HLW Corporation,)
)
)
Respondents.)
_____)

UNILATERAL ADMINISTRATIVE ORDER
FOR PARTICIPATION AND COOPERATION IN WATER REPLACEMENT

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ATTACHMENTS

Figure 1 - Map of Charnock Sub-Basin Investigation Area

- A. Scope of Work for Water Replacement
- B. Documentation of Historic Production from the Charnock Wellfields
- C. Documentation of Water Replacement Costs
- D. List of Respondents' Source Site Facilities

33. Respondent Thrifty is a corporation, incorporated in the State of California.
34. Respondent Best is a limited partnership, registered in the State of California.
35. Respondent Nishida is a person, residing in the State of California.
36. Respondent HLW is a corporation, incorporated in the State of California.

G. Respondents' Source Site Facilities' Ownership, Leasehold Interests, Operation and Releases

PRP SITE No. 1 - Exxon

1. Humble Oil & Refining Company (a predecessor in interest to Exxon Corporation) purchased a portion of the property at 11284 Venice Boulevard ("PRP Site No. 1") from Catherine Boos and Gladys Skulth on April 6, 1970 and another portion of the property from Judith Kushner on May 5, 1970. (See Grant Deeds provided in Exxon's July 24, 1997 Information Request Response ("PRP Site No. 1 Information Request Response") to the Agencies' June 19, 1997 Information Request.)
2. In the narrative portion of the PRP Site No. 1 Information Request Response, Exxon states that "Exxon Corporation, through its division Exxon Company USA owned the property at 11284 Venice Boulevard, Culver City, California from sometime prior to January 1, 1980 until February 2, 1995." On February 2, 1995, Mr. Azizedin Taghizadeh, purchased the property from Exxon. Exxon's narrative also states "On February 2, 1995, Mr. Azizedin Taghizadeh purchased the underground storage tanks and associated piping from Exxon."
3. Culver City Fire Department records indicate that PRP Site No. 1 was operated as a gasoline service station by Humble Oil Company since 1970. (See, October 14, 1998 Final Site Investigation Report prepared by Acton Mickelson Environmental ("AME Report") for Exxon, at page 1.)

4. The AME Report also stated that the Culver City Fire Department records indicate that the four USTs installed in 1971 (one 1,000 gallon used oil, one 6,000 gallon premium unleaded gasoline, one 8,000 gallon unleaded gasoline, and one 10,000 gallon regular leaded gasoline) were removed in January 1989. The AME Workplan indicates that the four USTs currently at the site (one 1,000 gallon used oil, two 10,000 gallon containing super and plus unleaded gasoline, and one 12,000 regular unleaded gasoline) were installed in January 1989. (See AME Report at page 2.)
5. On April 8, 1992, Jay Kruger of Exxon Company USA completed a UST Unauthorized Release (Leak)/Contamination Site Report for PRP Site No. 1. The Report indicated that a gasoline release was discovered on April 7, 1992 as part of a site investigation.
6. In response to the Agencies' June 19, 1997 Information Request, Exxon provided a Site Investigation and Cleanup History form for PRP Site No. 1. On this form, Exxon documented that PRP Site No. 1 had an unauthorized release that contaminated soil at the site with gasoline constituents.
7. The release history of PRP Site No. 1, along with the October 14, 1998 Final Site Investigation Report and the September 22, 1999 Quarterly Monitoring Report, document that PRP Site No. 1 has discharged gasoline containing MTBE that has impacted soil and groundwater. (See Final Site Investigation Report Table 4, See Quarterly Monitoring Report Table 3.)
8. On December 3, 1999, Exxon Corporation filed with the California Secretary of State for a name change from Exxon Corporation to Exxon Mobil Corporation.
9. Exxon is a past owner and/or operator of a facility, and has contributed to disposal within the meaning of RCRA Section 7003, 42 U.S.C. Section 6973, with respect to releases at PRP Site No. 1.

PRP Site No. 4 - Arco

1. On March 26, 1947, Richfield Oil Corporation obtained ownership of the property for ARCO Site No. 1246 (PRP Site

3. On June 14, 1992, Nancy Drew of the Los Angeles County Department of Public Works completed a UST Unauthorized Release (Leak)/Contamination Site Report. The Report indicated that releases of premium and regular unleaded gasoline were discovered on March 25, 1992 as a part of subsurface monitoring activities at the site.
4. In response to the Agencies' June 19, 1997 Information Request, Unocal provided a Site Investigation and Cleanup History for PRP Site No. 7. On this form, Unocal documented that PRP Site No. 6 had an unauthorized release that contaminated soil and groundwater with gasoline constituents.
5. The release history of PRP Site No. 7, along with the March 30, 1998 Site Assessment Report, documents that PRP Site No. 7 has released gasoline containing MTBE that has impacted soil and groundwater (See Site Assessment Report, Tables 1A, 2, and 4.)
6. Unocal is an owner and/or operator of a facility, and has contributed to disposal, within the meaning of RCRA Section 7003, 42 U.S.C. Section 6973, with respect to releases at PRP Site No. 7.

PRP Site No. 8 - Mobil

1. A July 24, 1964 Service Station Ground Lease indicates that Socony Mobil Oil Company, Inc. rented the property at 3800 Sepulveda Boulevard in Culver City from Suzanne Lawrence for a period of 15 years commencing on January 1, 1965. The Ground Lease included provision for the rental payment to be dependent, in part, on the volume of gasoline delivered to the property.
2. According to a Grant Deed provided by Mobil, Mobil Oil Corporation obtained the property at 3800 Sepulveda Boulevard in Culver City (PRP Site No. 8) from Suzanne Schaefer on March 2, 1984.
3. Mobil Oil Corporation entered into a Service Station Lease with Adli Abdelsayed on March 26, 1985. On April 15, 1988, Mobil Oil Corporation entered into another service station lease with Adli Abdelsayed. On August 2, 1996, Mobil Oil

Corporation entered a "Petroleum Marketing Practices Act" Fuels Franchise Agreement with Adli Abdelsayed.

4. According to a September 8, 1997 letter from Mobil Business Resources Corporation to the Regional Board, "Mobil Oil Corporation is the owner of the underground storage tanks used to store gasoline at Mobil Service Station 18-FX5 [PRP Site No. 8.]"
5. On August 14, 1990, Sheila A. Malloy of Mobil completed a UST Unauthorized Release (Leak)/Contamination Site Report. The Report indicated that a release of gasoline was discovered on August 9, 1990 during subsurface monitoring activities.
6. In response to the Agencies' June 19, 1997 Information Request, Mobil provided a Site Investigation and Cleanup History form for PRP Site No. 8. On this form, Mobil documented that PRP Site No. 8 had an unauthorized release of gasoline that contaminated soil and groundwater at the site with gasoline constituents.
7. The release history of PRP Site No. 8, along with the February 23, 1998 Subsurface Investigation Report, document that PRP Site No. 8 has released gasoline containing MTBE that has impacted soil and groundwater. (See Subsurface Investigation Report, Tables 2-2 and 4-3).
8. Mobil is an owner and/or operator of a facility, and has contributed to disposal, within the meaning of RCRA Section 7003, 42 U.S.C. Section 6973, with respect to releases at PRP Site No. 8.

PRP Site No. 10 - Chevron

1. A March 2, 1964 lease indicates that Standard Oil Company leased the property at 3775 Sepulveda Boulevard in Los Angeles (PRP Site No. 10) from Harold Merton Jack, the Estate of Hayward Davidson Jack, and Norma Alice Logan.
2. On January 17, 1980, Chevron U.S.A. Inc. extended the March 2, 1964 lease with the successors to the landowners of the PRP Site No. 10 property, listed as Greta H. Jack, Norma Alice Logan, Patricia Jean Cowie, and Nancy Merrill. The lease was subsequently modified, amended, and/or extended