

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



08-06-01

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

August 3, 2001

Mr. Mike Alo
Liquid Sugars, Inc. / MCP
P.O. Box 96
Oakland, California 94604

SUBJECT: Case Closure for Liquid Sugars, Inc. (STID# 537 / RO #11)
1275 66th Street, Emeryville, California 94608

Dear Mr. Alo:

This letter serves to notify you that this office has received concurrence from the San Francisco Bay RWQCB to close the case file for the above referenced site. The five groundwater monitoring wells (MW-1 to MW-5) at the site must be properly decommissioned. You can proceed with the well abandonment at the site. Please contact Alameda County Public Works for permit requirements to abandon the well. A well abandonment report must be submitted prior to the issuance of the Remedial Action Completion Certification.

Please notify this office at least 72 hours of the well abandonment work at the site. I can be reached at (510) 567-6780 if you have any questions regarding this letter or the subject site.

Sincerely,

Susan L. Hugo
Acting Supervisor
Hazardous Materials Specialist

c: Chuck Headlee, San Francisco Bay RWQCB
Jim Gribi, Gribi Associates, 1350 Hayes Street, Suite C-14, Benicia, CA 94510
SH / files

Sent 1/25/00
Including cc's

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

2011

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

January 25, 2000

Mr. Mike Alo
Liquid Sugars, Inc.
P.O. Box 96
Oakland, California 94604

RE: Liquid Sugars, Inc. (STID # 537)
1275 66th Street, Emeryville, California 94608

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Alo:

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

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

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

LANDOWNER NOTIFICATION
Re: 1275 66th Street, Emeryville, CA
January 25, 2000
Page 2 of 2

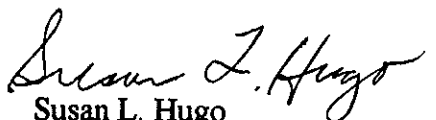
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

Please call me at (510) 567-6780 should you have any questions about the content of this letter.

Sincerely,


Susan L. Hugo
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
SH / files

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Name of local agency
Street address
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR
(*Site Name and Address*)

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Roll

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

June 9, 1999

Mr. Ronald Mooney
Liquid Sugars, Inc.
P.O. Box 96
Oakland, California 94604

RE: Liquid Sugars, Inc. (STID # 537)
1275 66th Street Emeryville, California 94608

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Mooney:

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

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

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

LANDOWNER NOTIFICATION

Re: 1275 66th Street, Emeryville

June 9, 1999

Page 2 of 2

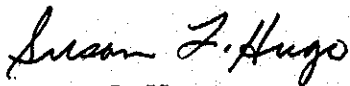
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

Please call me at (510) 567-6780 should you have any questions about the content of this letter.

Sincerely,



Susan L. Hugo
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

PO 11

May 11, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Ronald Mooney
Liquid Sugars, Inc.
P.O. Box 96
Oakland, CA 94604

**RE: Work Plan to Conduct Soil and Groundwater Investigation at
Liquid Sugars, Inc., 1275 66th Street, Emeryville, CA 94608 (STIP 537)**

Dear Mr. Mooney:

This office has reviewed the above referenced work plan, dated April 12, 1999, prepared and submitted by Gribi Associates for the subject site.

The work plan is acceptable provided the following issues are addressed:

1. The two monitoring wells (MW-1 and MW-2) at the site must be included in the sampling plan. The last sampling event for the two wells was conducted in December 1998.
2. Grab water samples must be collected from all six borings proposed in this investigation.
3. At a minimum, one soil sample from each boring should be collected at the soil / water interface.
4. Both soil and groundwater samples must be analyzed for the following target compounds: Total Petroleum Hydrocarbon (TPH) as gasoline, TPH as diesel, TPH as motor oil, benzene, toluene, ethyl benzene, xylene, methyl tertiary butyl ether, lead and semi - volatiles including polynuclear aromatic hydrocarbons (PNAs).
5. Quarterly groundwater monitoring must be conducted at the site.

Please notify our office at least 72 hours in advance of any field activity at the subject site.

If you have any questions concerning this letter or the subject site, I could be reached at (510) 567-6780.

Sincerely,

Susan L. Hugo
Hazardous Materials Specialist

c: Chuck Headlee, San Francisco Bay RWQCB
Jim Gribi, Gribi Associates, 1350 Hayes St., Suite C-14, Benicia, CA 94510
Bill Warren, 543 Watson Court, Benicia, CA 94510
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Roll

February 7, 1994
STID# 537

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

Mr. Alan Mooney
Liquid Sugars, Inc.
1285 66th Street
P.O. Box 96
Oakland, California 94604

**RE: Status of the Investigation / Remediation at
Liquid Sugars, Inc. (LSI) - 1275 66th Street
Emeryville, California 94608**

Dear Mr. Mooney:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the investigation of an unauthorized release associated with the former underground storage tanks (one 10,000 gallon diesel and two 1,000 gallon gasoline) removed in November, 1990 at the referenced site. We are in receipt of the following reports:

- * Third Quarterly Groundwater Monitoring Report (12/3/93) prepared and submitted by Century West Engineering
- * Second Quarterly Groundwater Monitoring Report (9/15/93) prepared and submitted by Century West Engineering
- * Groundwater Investigation Report (6/3/93), prepared and submitted by Century West Engineering 1993)

Soil samples collected during the installation of two monitoring wells MW-1 and MW-2 showed elevated levels of the following contaminants: TPH diesel (940 ppm), TPH gasoline (670 ppm), benzene (0.74 ppm), toluene (0.94 ppm), xylene (3.4 ppm) and ethyl benzene (1.6 ppm). In addition, the results of eight soil borings (TB-1 through TB-8) exhibited petroleum hydrocarbon contamination as high as 1,500 ppm TPH diesel, 610 ppm TPH gasoline, 1.2 ppm benzene, 0.31ppm toluene, 4.7 ppm xylenes, 2.5 ppm ethyl benzene.

Two monitoring wells were installed in April, 1993 and groundwater samples collected during the three sampling events (4/23/93, 7/13/93, and 11/2/93) had dissolved petroleum hydrocarbon contaminants: TPH diesel (210 ppb - 2,100 ppb); TPH gasoline (430 ppb - 1,100 ppb); benzene (6.3 ppb - 320 ppb); toluene (nd - 6.5 ppb); xylene (2.1 ppb - 13 ppb) and ethyl benzene (1.9 ppb - 8.2 ppb).

Mr. Alan Mooney
RE: 1275 66th Street, Emeryville, California 94608
February 7, 1994
Page 2 of 3

Based upon the review process of all the reports submitted to this office for the referenced site, the following issues must be addressed regarding the on going investigation / remediation at the subject site:

- 1) The extent of soil and/or groundwater contamination remains undefined. Additional soil borings and monitoring wells are necessary to characterize the extent of the plume. Please submit a work plan to delineate the vertical and lateral extent of contamination. The isoconcentration line of the contaminant plume must be determined.
- 2) The groundwater monitoring wells must be sampled every quarter for target compounds (TPH gasoline, TPH diesel, benzene, toluene, xylene, ethyl benzene) and verified downgradient flow direction must be established at the site. Groundwater elevation readings must be incorporated in the quarterly sampling. All monitoring wells must be surveyed to an accuracy of 0.01 foot and referenced to mean sea level (MSL).
- 3) Please submit a time schedule for all phases of the investigation and remediation activities at the site.

Response to items #1 and #3 mentioned above must be provided to this office **no later than March 28, 1994.**

Until cleanup is complete, you will need to submit reports to this office every three months (or at a more frequent interval, if specified at any time by this agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department of the responsible party or tank owner's intention

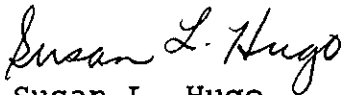
Mr. Alan Mooney
RE: 1275 66th Street, Emeryville, California 94608
February 7, 1994
Page 3 of 3

- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Edgar B. Howell, Chief, Hazardous Materials Division - files
Jim Gribi, Century West Engineering Corporation
7950 Dublin Blvd., Suite 210, Dublin, CA 94568

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Roll

October 2, 1991

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

Mr. W. Taylor Partch
Liquid Sugars, Inc.
1285 66th Street
P.O. Box 96
Oakland, CA 94604

**RE: Amended Workplan for a Preliminary Site Assessment
Liquid Sugars, Inc. - 1275 66th Street, Emeryville 94608**

Dear Mr. Partch:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the amended workplan for the preliminary site assessment prepared by Century West Engineering for the referenced site. A previous workplan submitted by Baseline Environmental Consulting on January 24, 1991 was reviewed and approved by this office on March 12, 1991.

Based on the review of this the amended workplan, it is acceptable provided the following conditions are met:

- * A timetable for the completion of the workplan elements must be submitted.
- * A site safety plan must be prepared and submitted to this office.

Verbal concurrence has been given to Mr. Jim Gribi of Century West Engineering on July 29, 1991 and on October 1, 1991 regarding the implementation of the amended workplan.

In addition to the workplan, documentation of what was done or will be done with the stockpiled soil must be submitted to this department. The number of samples collected from the stockpiled soil must be adequate to characterize the soil for handling/disposal method.

A report must be submitted within 30 days after completion of this investigation. All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professional involved with the project. Copies of reports or proposals must also be submitted to:

Eddie So
Regional Water Quality Control Board, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

Mr. W. Taylor Partch
 October 2, 1991
 Page 2 of 2

Please be aware that you are responsible for performing diligent actions to protect the waters of the State and that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response to this request may result in civil penalties imposed by RWQCB, a maximum of \$1,000 per day. Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or the RWQCB.

You will need to submit an additional deposit of \$670.00 payable to the County of Alameda as the initial deposit has been exhausted. This deposit is authorized under Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover costs that the Division of Hazardous Materials incurs during remediation oversight.

Should you have any questions concerning this letter, please contact me at (510) 271-4320.

Sincerely,

Susan L. Hugo
 Susan L. Hugo

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
 Gil Jensen, Alameda County District Attorney's Office
 Eddie So, San Francisco Bay RWQCB
 Howard Hatayama, State Department of Health Services
 Jim Gribi, Century West Engineering - 7950 Dublin Blvd.,
 Suite 210, Dublin, CA 94568

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Roll

March 12, 1991

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

Mr. W. Taylor Partch
Project Manager
Liquid Sugars, Inc.
P.O. Box 96
Oakland, California 94604

RE: Workplan For a Preliminary Site Assessment
Liquid Sugars, Inc. 1275 66th Street, Emeryville, CA 94608

Dear Mr. Partch:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the January, 1991 Baseline Environmental Consulting workplan for the investigation of subsurface contamination at the referenced site, as submitted under Baseline cover dated January 24, 1991. The workplan is acceptable provided the following specific areas of concern to this department are addressed.

- * The proposed excavation of hydrocarbon contaminated soil at levels greater than 100 parts per million is acceptable. Verification samples must be collected in the excavation zone to ensure that no hydrocarbon contamination greater than 100 parts per million remains in the subsurface (at a minimum but not limited to one sample per 200 square feet).
- * Stockpiled soils must be placed on plastic sheeting, bermed and covered. This agency has no objection to the proposed enhanced bioremediation of the contaminated soil. However, please be aware that permits from other regulatory agencies may be required prior to implementation of the proposed treatment process. Stockpiled soils must be characterized according to its intended disposal. Sampling for reuse of the aerated/ remediated soil should occur at the rate of one discrete sample for every 20 cubic yards of soil. Requirements of sampling for soils destined for disposal at a Class 3 facility are less stringent and one composite sample for every 50 cubic yards is generally sufficient. Proper disposition of soils must be supported by sample analysis by the state certified lab.
- * Using the groundwater flow direction from a nearby hydrogeologic investigation at 901 Ashby Avenue which is approximately 1,000 feet from the referenced site is not acceptable for verification of downgradient flow of groundwater at the site. A minimum of three monitoring wells must be installed to determine groundwater

Mr. W. Taylor Partch
March 12, 1991
Page 2 of 3

gradient. If the verified down-gradient location has been established, then complete gradient data must be submitted and only one monitoring well must be installed in the down-gradient direction within ten feet of the former tank excavation. Construction of monitoring wells must be consistent with the RWQCB guidelines and be able to permit entrance of any free floating product into the wells. You should anticipate monitoring quarterly or at a more frequent intervals depending on the data collected from initially sampling of soil and groundwater. Levels and quality of groundwater must be monitored quarterly for a minimum of one year, even if no contamination is identified.

- * Chain of custody for the groundwater sample W-1 collected on 12/5/90 must be submitted to this office.
- * Report of the analysis of groundwater sample W-1 collected on 12/5/90 must be signed by the state certified lab and submitted to this office.

The need for additional investigative or remedial actions at this site will be based upon the data derived from this preliminary assessment. You may implement remedial actions before approval of the workplan to diligently act in protecting the groundwater. However, final concurrence by this office will depend on the extent to which the work done meets requirements of this letter.

This department will oversee the assessment and remediation for this site. However, RWQCB may choose to take over as lead agency if it is determined from this initial assessment that there has been substantial impact to ground water. The issuance of well drilling permits will be through the Alameda County Flood Control and Water Conservation District, Zone 7.

A report must be submitted within 30 days after completion of this initial investigation. Subsequent reports must be submitted quarterly until the site can be recommended for RWQCB "sign off". All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professional involved with the project. Copies of reports and proposals must also be submitted to RWQCB (attention: Lester Feldman).

Please be aware that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond could result to civil penalties, a maximum of

Mr. W. Taylor Partch
March 12, 1991
Page 3 of 3

\$1,000 per day. Any extentions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or the RWQCB.

Should you have any questions about this letter, please contact me at (415) 271-4320.

Sincerely,



Susan L. Hugo
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, District Attorney, Alameda County Consumer and Environmental Protection Agency
Lester Feldman, San Francisco Bay RWQCB
Howard Hatamaya, State Department of Health Services
Irene Kan, Baseline Environmental Consulting files
L.S.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Roll

December 5, 1990

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

Mr. Robert Faulkner
LSI/Liquid Sugars
P.O. Box 96
Oakland, California 94604

**RE: Unauthorized Release / Removal of Underground Fuel Tanks
LSI/ Liquid Sugars - 1275 66th Street, Emeryville 94608**

Dear Mr. Faulkner:

This letter records our recent meeting regarding the unauthorized release from the underground storage tanks at the above facility. As you know, a considerable amount of Total Petroleum Hydrocarbon was discovered during the removal of the underground storage tanks. Because of the amount of contamination found, the facility is considered to have experienced a confirmed release. Title 23 of the California Code of Regulations requires all such unauthorized releases from underground tanks to be reported. An unauthorized release report must be filed with this office within 5 days of the date of our December 4, 1990 meeting; in addition, you must initiate further investigation and/or cleanup activities at this site.

First, a preliminary assessment should be conducted to determine the extent of soil and groundwater contamination that has resulted from the leaking tank(s). The information gathered by this investigation will be used to assess the need for additional actions at the site. The preliminary assessment should be designed to provide all of the information in the format shown at the end of this letter. This format is based on the Regional Water Quality Control Board (RWQCB's) guidelines. You should be prepared to install one monitoring well, if you can verify the direction of groundwater flow in the immediate vicinity of the site, and three wells or piezometers, if you cannot.

Until cleanup is complete, you will need to submit reports to this office and to the RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports should include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

Mr. Faulkner

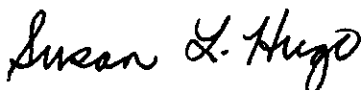
Page 2 of 6

Soils contaminated at hazardous waste concentrations should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the California Department of Health Services. Soils contaminated below the hazardous threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements.

Your work plan should be submitted to this office within 30 days of the date of this letter. A report describing the results of the preliminary site assessment should be submitted within 60 days of the date of this letter. Copies of the proposal and report should also be sent to the RWQCB (attention: Lester Feldman). You may implement remedial actions before approval of the work plan, but final concurrence by this office will depend on the extent to which the work done meets the requirements described in this letter.

Should you have any questions about this letter or about remediation requirements established by the RWQCB, please contact the undersigned at 271-4320.

Sincerely,



Susan L. Hugo
Hazardous Materials Specialist

cc:

Rafat Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, District Attorney, Alameda County Consumer and
Environmental Protection Agency
Lester Feldman, San Francisco Bay RWQCB
Howard Hatayama, State Department of Health Services
Files

Mr. Faulkner

Page 3 of 6

WORK PLAN FOR INITIAL SUBSURFACE INVESTIGATION

This outline should be followed by professional engineering or geologic consultants in preparing work plans to be submitted to the RWQCB and local agencies. Work plans should be signed by a California-registered engineer or geologist.

This outline should be referred to in context with the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks" (August 10, 1990).

PROPOSAL FORMAT

I. Introduction

A. State the scope of work

B. Provide information on site location, background, and history

1. Describe the type of business and associated activities that take place at the site, including the number and capacity of operating tanks.
2. Describe previous businesses at the site.
3. Provide other tank information:
 - number of underground tanks, their uses, and construction material;
 - filing status and copy of unauthorized release form, if not previously submitted;
 - previous tank testing results and dates, including discussion of inventory reconciliation methods and results for the last three years.
4. Other spill, leak, and accident history at the site, including any previously removed tanks.

II. Site Description

A. Describe the hydrogeologic setting of the site vicinity

B. Prepare a vicinity map (including wells located on-site or on adjoining lots, as well as any nearby streams)

C. Prepare a site map

Mr. Faulkner

Page 4 of 6

D. Summarize known soil contamination and results of excavation

1. Provide results in tabular form and indicate location of all soil samples (and water samples, if appropriate). Sample dates, the identity of the sampler, and signed laboratory data sheets need to be included, if not already in possession of the County.
2. Describe any unusual problems encountered.
3. Describe methods for storing and disposing of all contaminated soil.

III. Plan for Determining Extent of Soil Contamination

A. Describe method for determining the extent of contamination within the excavation

B. Describe sampling methods and procedures to be used

1. If a soil gas survey is planned, then:
 - identify number of boreholes, locations, sampling depths, etc.;
 - identify subcontractors, if any;
 - identify analytical methods;
 - provide a quality assurance plan for field testing.
2. If soil borings are to be used to determine the extent of soil contamination, then:
 - identify number, location (mapped), and depth of the proposed borings;
 - describe the soil classification system, soil sampling method, and rationale;
 - describe the drilling method for the borings, including decontamination procedures;
 - explain how borings will be abandoned.

C. Describe how clean and contaminated soil will be differentiated, and describe how excavated soil will be stored and disposed of. If on-site soil aeration is to be used, then describe:

Mr. Faulkner

Page 5 of 6

1. The volume and rate of aeration/turning;
2. The method of containment and cover;
3. Wet-weather contingency plans;
4. Results of consultation with the Bay Area Air Quality Management District.

Other on-site treatments (such as bioremediation) require permits issued by the RWQCB. Off-site storage or treatment also requires RWQCB permits.

- D. Describe security measures planned for the excavated hole and contaminated soil

IV. Plan for Characterizing Groundwater Contamination

Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks."

- A. Explain the proposed locations of monitoring wells (including construction diagrams), and prepare a map to scale
- B. Describe the method of monitoring well construction and associated decontamination procedures
 1. Expected depth and diameter of monitoring wells.
 2. Date of expected drilling.
 3. Locations of soil borings and sample collection method.
 4. Casing type, diameter, screen interval, and pack and slot sizing technique.
 5. Depth and type of seal.
 6. Development method and criteria for determining adequate development.
 7. Plans for disposal of cuttings and development water.
 8. Surveying plans for wells (requirements include surveying to established benchmark to 0.01 foot).
- C. Groundwater sampling plans
 1. Water level measurement procedure.

Mr. Faulkner

Page 6 of 6

2. Well purging procedures and disposal protocol.
3. Sample collection and analysis procedures.
4. Quality assurance plan.
5. Chain-of-custody procedures.

V. Prepare a Site Safety Plan