

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
01-17-06

January 13, 2006

Mr. Nissan Saidian  
5733 Medallion Ct.  
Castro Valley, CA 94522

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

Dear Mr. Saidian:

Subject: Fuel Leak Case No. RO22, 1310 Central Ave., Alameda, CA 94501

Alameda County Environmental Health staff has reviewed the December 29, 2005 Report of Area Well Survey, Site Conceptual Model & Workplan for Additional Soil and Groundwater Assessment for the subject site prepared by Aqua Science Engineers. Additional off-site borings and one monitoring well are proposed to further investigate the extent of the hydrocarbon release from this site. We generally approve of the work plan and request that you address the following technical comments and submit the technical report requested below.

#### TECHNICAL COMMENTS

1. We request that one additional monitoring well be installed near former boring BH-B. This well will enhance the understanding of the plume shape and the expected hydrocarbon concentration beneath the neighboring residential properties.
2. You may use field observations and existing monitoring data to determine the appropriate screen interval for the new wells. We recommend that the screen interval be no greater than 10' in length.
3. As onsite contaminant concentrations remain elevated, we concur that your investigation report include a corrective action plan, which targets the onsite source areas.

#### TECHNICAL REPORT REQUEST

Please submit the technical reports according the schedule below:

- April 17, 2006-Off-site investigation report

#### ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will 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 (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at [barney.chan@acgov.org](mailto:barney.chan@acgov.org).

**PERJURY STATEMENT AND PROFESSIONAL CERTIFICATION**

All work plans, technical reports, or technical documents submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following:

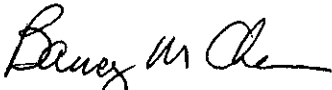
"I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge."

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.

Additionally, to be considered a valid technical report you are to present site specific data, data interpretations, and recommendations prepared by the 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.

If you have any questions, please contact me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

Attachment: pdf instructions

C: files, D. Drogos  
Mr. R. Kitay, ASE Inc., 208 W. El Pintado, Suite C, Danville, CA 94526

1\_13\_06 1310Central

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
5-9-05

ENVIRONMENTAL HEALTH SERVICES

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

May 6, 2005

Mr. Nissan Saidian  
5733 Medallion Ct.  
Castro Valley, CA 94522

Dear Mr. Saidian:

Subject: Fuel Leak Case No. RO22, 1310 Central Ave., Alameda, CA 94501

Alameda County Environmental Health staff has recently reviewed the case file for the subject site and determined that additional information is required to progress toward case closure. We require that additional monitoring well(s) be installed to monitor the down-gradient edge of the petroleum plume. Please submit a work plan to fulfill this need and address the following technical comments when performing your proposed work.

TECHNICAL COMMENTS

1. Groundwater at the site is shallow, reportedly ranging from 3-6' bgs and soil type has been described as silty sand of relatively high conductivity to the depth explored, 18' bgs. Your consultant, therefore, states that groundwater is likely within the shallow utilities and trenches on and off-site. However, it does not appear that petroleum contamination has migrated into the storm drains, which were sampled. Releases of petroleum have occurred over time from the tanks, piping and dispensers as indicated by historic grab samples and monitoring well results. We request that you develop a site conceptual model (SCM) to describe the residual contamination and its likely migration in the subsurface and its potential impact to sensitive receptors. Please include an evaluation of both lateral and vertical contaminant migration and its potential impact to sensitive receptors. Please submit your SCM as requested below.
2. Please submit a conduit study including a well survey of all wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic protection wells) within a 1/2 mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, such as old deep agricultural wells, or private residential wells that can act as pathways for migration of contamination at and/or from your site. Please submit your conduit study as requested below.
3. Please provide a work plan to determine the lateral and vertical extent of soil and groundwater contamination. It is anticipated that your investigation will include off-site borings and wells due to the variable groundwater gradient reported. Please submit your work plan as requested below.

May 6, 2005  
RO 22  
Mr. Nissan Saidian  
May 6, 2005  
Page 2

#### TECHNICAL REPORT REQUEST

Please submit the technical reports according the schedule below:

- June 6, 2005- Site Conceptual Model, conduit study and work plan for plume characterization.

#### PERJURY STATEMENT AND PROFESSIONAL CERTIFICATION

All work plans, technical reports, or technical documents submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following:

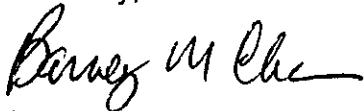
"I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge."

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.

Additionally, to be considered a valid technical report you are to present site specific data, data interpretations, and recommendations prepared by the 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.

If you have any questions, please contact me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: files, D. Drogos  
Mr. R. Kitay, ASE Inc., 208 W. El Pintado, Danville, CA 94526

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO000022

June 23, 2003

Mr. Nissan Saidian  
5733 Medallion Court  
Castro Valley, CA 94522

Dear Mr. Saidian:

**RE: Alaska Gasoline, 1310 Central Ave., Alameda, CA 94502**

Alameda County Environmental Health, Local Oversight Program (LOP), has reviewed the case file for the subject site including the December 13, 2003 Workplan for soil and Groundwater Assessment by Mr. Robert Kithay of Aqua Science Engineers. The above has also been discussed with Mr. Kithay of Aqua Science Engineers. As you are aware additional investigation and Conduit Study was required to determine whether subsurface utility lines could provide a preferential pathway for the existing plume. The submitted workplan is acceptable to this office. However, per my discussion with Mr. Kithay of Aqua Science Engineers, you should address additional plan regarding the Central Ave sewer line specifically around BH-B soil boring and submit the addendum to this office. Please continue with the monitoring plan as specified previously.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: D.Drogos, A.Gholami  
Mr. R. Kitay, ASE Inc., 208 W. El Pintado, Danville, CA 94526  
files

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director  
October 11, 2002



10-14-02

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

Mr. Nissan Saidian  
5733 Medallion Court  
Castro Valley, CA 94522

Dear Mr. Saidian:

Subject: Fuel Leak Case No. RO0000022, 1310 Central Ave., Alameda, CA 94502

Alameda County Environmental Health, Local Oversight Program (LOP), has reviewed the case file for the subject site including the October 2, 2002 Quarterly Monitoring Report from Aqua Science Engineers. We have determined that additional investigation is required to progress towards case closure. Please address the following technical comments and submit the technical reports requested below.

Technical Comments

1. Because of the shallow groundwater present at this site, there is a potential that shallow utilities on and off-site may be acting as preferential pathways of contaminant migration. Prior to performing additional subsurface investigation, please perform a utility survey to identify any potential conduits. Should utilities exist that may pose a conduit, please provide a sampling plan to determine if they have been impacted.
2. After performing your utilities survey, additional off-site investigation is necessary to determine the extent of the contaminant plume and permanent wells are necessary to verify groundwater conditions.

Technical Report Request

Please submit the following technical reports to our office according to the following schedule:

- November 15, 2002- Please submit the results of your utilities investigation and any recommendations for investigation. Please also include a work plan with recommendations for off-site investigation.
- January 9, 2003- Groundwater Monitoring Report for the fourth quarter 2002.

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

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Mr. R. Kitay, ASE Inc., 208 W. El Pintado, Danville, CA 94526

Techrp1310 CentralAve

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



04-18-01

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

RO0000022

April 17, 2001

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

**RE: Offsite Investigation at 1310 Central Avenue, Alameda, CA**

Dear Mr. Sappal:

I am currently the new case worker for the above referenced site. Upon review of the file, it appears that a significant fuel release had occurred from the former underground storage tanks (which were removed in May 1996). The contaminant plume has migrated offsite in the north, northwesterly direction.

At this time, additional investigations are required to delineate the extent of the plume. Permanent well(s) are also required north, northwest of the site. A work plan for the next phase of investigation is due within 60 days of the date of this letter, or by **June 18, 2001**. In addition, this office is not in receipt of a groundwater monitoring event since August 2000. Quarterly groundwater monitoring must be reinstated immediately. Quarterly reports are due 60 days upon completion of field work.

**Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.**

If you have any questions, I can be reached at (510) 567-6762.

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Hazardous Materials Specialist

c: Nissan Saidian, 5733 Medallion Ct, Castro Valley, CA 94522  
Robert Kitay, Aqua Science, 208 West El Pintado, Danville, CA 94572  
Shivcharanjit Lal, 5348 Brookwood, Richmon, CA 94803

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 9-19-2000

2022

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

September 15, 2000

Mr. Pritpaul Sappal  
C/o Mr. Nissan Saidian  
5733 Medallion Court  
Castro Valley, CA 94522  
STID 3828

RE: Former Alaska Oil Service Station, 1310 Central Avenue, Alameda, CA

Dear Messrs. Sappal and Saidian:

I have reviewed the Report for Soil and Groundwater Assessment dated August 22, 2000 that was prepared by Aqua Science Engineers Inc. On July 28, 2000 twelve soil borings (BH-A to BH-L) were advanced both on and off-site to evaluate the subsurface at the above address. The groundwater sample from off-site boring BH-B contained 1,800 ppb TPH(gas), 270 ppb benzene, 8.8 ppb toluene, 18 ppb ethylbenzene, 13 ppb total xylenes, 4,100 ppb MTBE, 5.6 ppb tert-amyl methyl ether (TAME), and 440 ppb tert-butanol (TBA). The groundwater sample from off-site boring BH-C contained 230 ppb TPH(gas), 11 ppb benzene, 1.2 ppb toluene, 0.96 ppb total xylenes, 760 ppb MTBE, 6.6 ppb TAME, and 130 ppb TBA.

This office agrees with your consultant that further investigation should be performed to assist in delineating the extent of hydrocarbons downgradient of boring BH-B and BH-C. Please submit a workplan to this office within 30 days of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Robert Kitay, Aqua Science Engineers Inc., 208 West El Pintado, Danville,  
CA 94526  
Pritpaul Sappal, 872 Coral Drive, Rodeo, CA 94572  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 6/2/2000  
incl cc's

R022

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

June 2, 2000

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572  
STID 3828

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed and discussed the Workplan for Soil and Groundwater Assessment dated May 24, 2000 with Robert Kitay with Aqua Science Engineers. It is acceptable.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Nissan Saidian, 5733 Medallion Court, Castro Valley, CA 94522  
Robert Kitay, Aqua Science Engineers Inc., 208 W. El Pintado, Danville,  
CA 94526

Files



SNT 2-29-2000  
Maid cas

R022

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

February 28, 2000

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572  
STID 3828

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Sappal:

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: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501  
February 28, 2000  
Page 2 of 2

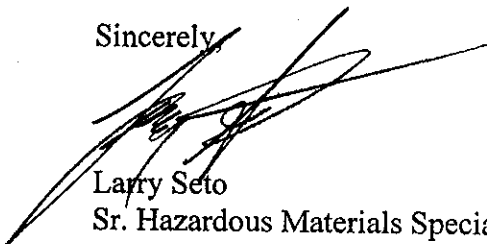
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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) 567-6774 should you have any questions about the content of this letter.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

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

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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



*Sent 1/26/00  
Including cc's*

0022

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

January 24, 2000

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572  
STID 3828

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed the Results of Drilling, Sampling and Monitoring Well Installation dated December 21, 1999 that was prepared by Herschy Environmental. This office concurs with your consultant's conclusion that the three newly installed monitoring wells contain relatively high concentration of gasoline constituents. In addition, the lateral extent of impact to groundwater has not been determined. It is acceptable that at least one additional quarterly sampling event be performed to evaluate for seasonal variation in groundwater flow direction before submitting a workplan to install additional wells.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Herman Schymiczek, Herschy Environmental, PO Box 229, Bass Lake,  
CA 93604-0229

Files



June 27, 2001

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

Nissan Saidian  
Leon Zektser  
Owner/Operators  
Alameda Gas  
1310 Central Avenue  
Alameda, California 94501

**NOTICE OF VIOLATION**

Dear Messrs. Saidian and Zektser,

A regulatory compliance inspection was performed on June 25, 2001 at your facility listed above. A technician from your contractor, Central Petroleum Maintenance, facilitated the inspection of your underground storage tank (UST) system. The purpose of the inspection was to determine your facility's compliance with the conditions of your operating permit, and with provisions in Title 23, California Code of Regulations and the California Health and Safety Code.

Following a review of your UST monitor alarm history it became apparent that the submersible turbine pump (STP) sump sensor in the 87-octane tank had been in alarm since March 12, 2001. Mr. Zektser stated that no written log or other records of actions taken to correct the alarm exist. During the approximately 90 days since the initial alarm no actions have been taken to determine the source or magnitude of the problem in the piping sump. **Consequently, you are in violation of your permit to operate and the California Health and Safety Code.**

**California Health and Safety Code (H&SC), Section 25293- Failure to record the results of the monitoring equipment indicating a release had occurred. Sensor L1 in alarm which indicated that a release occurred in the 87 STP sump. Failure to correct a condition indicating a release of product to the secondary containment. No action was taken to investigate or to record the release.**

Please be advised that HSC Sec. 25299(a) provide for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

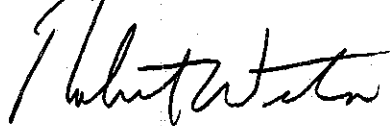
- (2) Violation of any applicable requirement of the permit
- (3) Failure to maintain records, as required.
- (6) Violation of any applicable requirements of HSC Chapter 6.7

Alameda Gas  
Notice of Violation  
Page 2 of 2

You are required to assure that all monitoring system alarms are recorded in the operating log and investigated in a timely manner. All records of maintenance and repairs to the UST system are to be maintained on-site for three years. The records shall be made available for review during normal business hours. All of these operating conditions are stated either in the permit to operate or in your tank monitoring plan.

If you have any questions regarding these issues please contact me at (510) 567-6781.

Sincerely,



Robert Weston  
Sr. Hazardous Materials Specialist

Cc: Susan Hugo, Manager, ACDEH  
Susan Torrence, Alameda County District Attorney's Office



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



*R022*

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

August 17, 1999

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572  
STID 3828

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed your Revision to Workplan, Alaska Gasoline Company dated August 13, 1999 that was prepared by Herschy Environmental. It is acceptable.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Herman Schymiczek, Herschy Environmental, P.O. Box 229,  
Bass Lake, Ca 93604-0229

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 22

April 9, 1999

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572  
STID 3828

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501.

Dear Mr. Sappal:

I have reviewed your Workplan dated March 24, 1999 that was prepared by All Environmental, Inc. (AEI). AEI proposes to advance three (3) on-site soil borings, and two (2) off-site soil borings to further assess the extent of soil and groundwater impact. The soil borings will be converted to groundwater monitoring wells (MW-1 thru MW-5). This workplan is acceptable.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Peter McIntyre, All Environmental, 901 Moraga Road, Suite C  
Lafayette, CA 94549-4567  
Alameda Fire, 1300 Park Street, Alameda, CA  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO# 22

February 5, 1999

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572  
STID 3828

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

In my letter dated January 5, 1999, I requested a Soil and Investigation workplan that is due today. Your consultant, Peter McIntyre of All Environmental requested a forty-five day extension due to the workload in his office. This extension is accepted. Please submit your workplan no later than March 24, 1999.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Peter McIntyre, All Environmental, 901 Moraga Road, Suite C,  
Lafayette, CA 94549-4567  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro # 22

January 8, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I sent you a letter January 5, 1998 that requested you to submit a Soil and Investigation workplan to this office. The address of that letter should be January 5, 1999, not January 5, 1998. Please make this correction to the date.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Captain Steve McKinley, Alameda Fire  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 22

January 8, 1999

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I sent you a letter January 5, 1998 that requested you to submit a Soil and Investigation workplan to this office. The address of that letter should be January 5, 1999, not January 5, 1998. Please make this correction to the date.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: ✓ Captain Steve McKinley, Alameda Fire  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0#22

January 7, 1999

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

Ms. Cheryl Gordon:  
State Water Resources Control Board  
2014 T Street, Suite 130  
Sacramento, CA 95814  
STID 3828

RE: Claim #12650 @ 1310 Central Avenue, Alameda, CA

Dear Ms. Gordon:

This letter is to inform you that the subsurface workplan I approved for the above site in October 1998 was implemented in November 1998. A Phase II Subsurface Investigation report dated December 14, 1998, which summarizes the implementation of this workplan, has been submitted to this office for review.

I wrote a letter dated January 5, 1999 to Mr. Pritpaul Sappal, requesting A Soil and Investigation workplan to define the extent of the release at the above site.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Pritpaul Sappal, 872 Coral Drive, Rodeo, CA 94572  
Peter McIntyre, All Environmental, 901 Moraga Road, Suite C,  
Lafayette, CA 94549-4567

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 22

Certified Mailer # 2115 343 878

January 5, <sup>1999</sup> 1998

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed your Phase II Subsurface Investigation report dated December 14, 1998 that was prepared by All Environmental, Inc. A subsurface investigation at the property on November 10 and 11, 1998. A total of 14 soil borings (BH-1 to BH-14) were advanced. The soil borings were advanced in the location of the former underground storage tank excavation, former dispenser islands and the waste oil tank. Strong hydrocarbon odor was observed during the advancement of many of the soil borings and sample collection. Soil samples analyzed contained concentrations of TPH as gasoline generally around the former tank excavation and dispensers with a maximum of 5,900 ppm in BH-2. TPH as diesel was detected in BH-8 at 300 ppm. Total Oil & Grease was detected around the former waste oil tank at a maximum of 3,300 ppm in BH-9.

A hydrocarbon sheen was observed on the groundwater samples collected from BH-1, BH-3, BH-4, and BH-7. TPH as gasoline and BTEX were detected at significant concentrations in the groundwater around the former tanks, dispensers and waste oil tank. The maximum concentrations of TPH(g), TPH(d) and benzene were 120,000 ppb, 6,400 ppb and 7,200 ppb respectively.

This investigation indicates significant concentrations of petroleum hydrocarbons present in the soil and groundwater beneath the site. Based on the results of the soil samples analyzed, all of the impacted soil was not removed during the previous extensive excavation activities.

Please submit a Soil and Investigation workplan to define the extent of the release as required in Section 2724, California Code of Regulations, Title 23, Division 3, Chapter 16 within 30 days of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Captain Steve McKinley, Alameda Fire  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Ro#22

Certified Mailer #

ENVIRONMENTAL HEALTH SERVICES

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

January 5, ~~1998~~ 1999

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed your Phase II Subsurface Investigation report dated December 14, 1998 that was prepared by All Environmental, Inc. A subsurface investigation at the property on November 10 and 11, 1998. A total of 14 soil borings (BH-1 to BH-14) were advanced. The soil borings were advanced in the location of the former underground storage tank excavation, former dispenser islands and the waste oil tank. Strong hydrocarbon odor was observed during the advancement of many of the soil borings and sample collection. Soil samples analyzed contained concentrations of TPH as gasoline generally around the former tank excavation and dispensers with a maximum of 5,900 ppm in BH-2. TPH as diesel was detected in BH-8 at 300 ppm. Total Oil & Grease was detected around the former waste oil tank at a maximum of 3,300 ppm in BH-9.

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This investigation indicates significant concentrations of petroleum hydrocarbons present in the soil and groundwater beneath the site. Based on the results of the soil samples analyzed, all of the impacted soil was not removed during the previous extensive excavation activities.

Please submit a Soil and Investigation workplan to define the extent of the release as required in Section 2724, California Code of Regulations, Title 23, Division 3, Chapter 16 within 30 days of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Captain Steve McKinley, Alameda Fire  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 22

October 21, 1998

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed your revised workplan dated October 13, 1998 that was prepared by All Environmental. It is acceptable with the understanding that a minimum of one and up to two of the most impacted soil samples from each boring will be selected for analysis.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Jennifer Pucci, All Environmental, Inc., 901 Moraga Road, Suite C  
Lafayette, CA 94549-4567  
Captain Steve McKinley, Alameda Fire  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 22

August 12, 1998

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

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

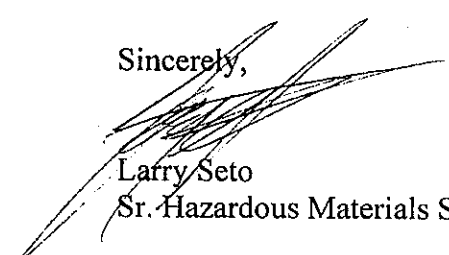
Dear Mr. Sappal:

I have reviewed your proposed workplan dated July 30, 1998 that was prepared by All Environmental, Inc. The following information must be submitted to this office for approval before this workplan can be approved.

- 1) A table with soil and groundwater analytical data generated from previous investigations
- 2) Site map drawn to scale identifying the locations of the former underground tanks, former piping, former dispenser islands, new underground tanks, new dispenser islands, and new piping. In addition, the map should also identify the sampling locations of the previous investigation, and the limits of the overexcavation.
- 3) A minimum of one soil sample (most impacted), and one water sample from each boring must be submitted to the laboratory for analysis
- 4) The workplan must be submitted under the seal of a California Registered Geologist or Registered Engineer

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Jennifer Pucci, All Environmental, Inc. 901 Moraga Road, Suite C  
Lafayette, Ca 94549-4567  
Captain Steve McKinley, Alameda Fire  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



LEBLEY

Ro# 22

Certified Mailer # Z 115 363 878

ENVIRONMENTAL HEALTH SERVICES

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

January 5, 1998

Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

RE: Alaska Gas, 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

I have reviewed your Phase II Subsurface Investigation report dated December 14, 1998 that was prepared by All Environmental, Inc. A subsurface investigation at the property on November 10 and 11, 1998. A total of 14 soil borings (BH-1 to BH-14) were advanced. The soil borings were advanced in the location of the former underground storage tank excavation, former dispenser islands and the waste oil tank. Strong hydrocarbon odor was observed during the advancement of many of the soil borings and sample collection. Soil samples analyzed contained concentrations of TPH as gasoline generally around the former tank excavation and dispensers with a maximum of 5,900 ppm in BH-2. TPH as diesel was detected in BH-8 at 300 ppm. Total Oil & Grease was detected around the former waste oil tank at a maximum of 3,300 ppm in BH-9.

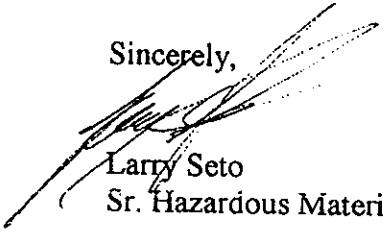
A hydrocarbon sheen was observed on the groundwater samples collected from BH-1, BH-3, BH-4, and BH-7. TPH as gasoline and BTEX were detected at significant concentrations in the groundwater around the former tanks, dispensers and waste oil tank. The maximum concentrations of TPH(g), TPH(d) and benzene were 120,000 ppb, 6,400 ppb and 7,200 ppb respectively.

This investigation indicates significant concentrations of petroleum hydrocarbons present in the soil and groundwater beneath the site. Based on the results of the soil samples analyzed, all of the impacted soil was not removed during the previous extensive excavation activities.

Please submit a Soil and Investigation workplan to define the extent of the release as required in Section 2724, California Code of Regulations, Title 23, Division 3, Chapter 16 within 30 days of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

Cc: Captain Steve McKinley, Alameda Fire  
Files

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY

DAVID J. KEARS, Agency Director



R0#22

June 2, 1997

Mr. Pritpaul Sappal  
Alaska Gas  
872 Coral Drive  
Rodeo, CA 94572

**ENVIRONMENTAL HEALTH SERVICES**

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

STID 3828

Re: Required investigations at 1310 Central Avenue, Alameda, California

**NOTICE OF VIOLATION**

Dear Mr. Sappal,

On November 26, 1996, this office sent you a letter requesting that you submit a work plan to address further investigations into the soil and groundwater contamination identified at the above site during the April 30, 1996 underground storage tank removals (Attached is a copy of the November 26, 1996 letter outlining the required investigations). This work plan was due to this office by January 1997. In my conversation with Bruce Hageman, of Hageman-Aguiar Associates, on January 24, 1997, Mr. Hageman stated that Hageman-Aguiar Associates had been retained to prepare the work plan and that he would submit a work plan in February 1997. However, to date, the required work plan has not been submitted to this office. Per my conversation with Mr. Gary Aguiar today, June 2, 1997, Hageman-Aguiar Associates was never retained to do the work.

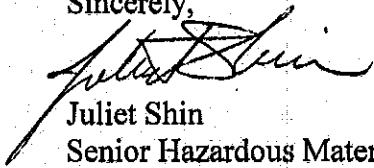
Per Article 11, Title 23 California Code of Regulations and the Regional Water Quality Control Board's interim guidelines, this office is requesting that you submit a workplan addressing the required work outlined in the November 26, 1996 letter by July 28, 1997. Any requests for extensions of the due dates must be made in writing and approved by this agency. Continued noncompliance may result in referral of this case to the Alameda County District Attorney's office.

The work plan should include a cover letter, signed by you, acknowledging your review and acceptance of the work plan.

Mr. Pritpaul Sappal  
Re: 1310 Central Ave.  
June 2, 1997  
Page 2 of 2

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

**ATTACHMENT**

cc: Mr. Shivcharanjit Lal  
695 Harbour Bay  
Richmond, CA 94801



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#22

June 2, 1997

Mr. Schivcharanjit Lal  
Alaska Gas  
695 Harbour Bay  
Richmond, CA 94801

ENVIRONMENTAL HEALTH SERVICES

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

STID 3828

Re: Required investigations at 1310 Central Avenue, Alameda, California

**NOTICE OF VIOLATION**

Dear Mr. Lal,

On November 26, 1996, this office sent you a letter requesting that you submit a work plan to address further investigations into the soil and groundwater contamination identified at the above site during the April 30, 1996 underground storage tank removals (Attached is a copy of the November 26, 1996 letter outlining the required investigations). This work plan was due to this office by January 1997. In my conversation with Bruce Hageman, of Hageman-Aguiar Associates, on January 24, 1997, Mr. Hageman stated that Hageman-Aguiar Associates had been retained to prepare the work plan and that he would submit a work plan in February 1997. However, to date, the required work plan has not been submitted to this office. Per my conversation with Mr. Gary Aguiar today, June 2, 1997, Hageman-Aguiar Associates was never retained to do the work.

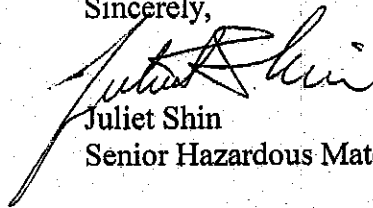
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The work plan should include a cover letter, signed by you, acknowledging your review and acceptance of the work plan.

Mr. Schivcharanjit Lal  
Re: 1310 Central Ave.  
June 2, 1997  
Page 2 of 2

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

**ATTACHMENT**

cc: Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Ro# 22

March 18, 1997

Mr. Rico Duazo  
2101 Webster St., Ste 500  
Oakland, CA 94612

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

STID 3828

Re: Discharge of elevated levels of benzene into the storm drain at 1310 Central Avenue,  
Alameda, California

Dear Mr. Duazo,

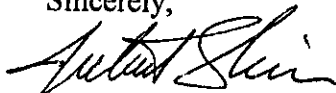
Per our conversation on February 24, 1997, here is a written summary of the Emergency Response incident at the above site. The County's Emergency Response (ER) team was called out to the above site on Saturday night, February 22, 1997, in response to neighbors' complaints of odors associated with the discharge of water from a carbon filter drum on site. The County Inspector on ER duty, Paul Smith, was met at the site by Chris Riley, Alameda Fire Department, and Bob Glover, Alameda Police Department. Mr. Smith turned off the discharge pump with guidance from the site's contractor Petrotek, and collected a water sample of the effluent from the carbon filter drum (please refer to attached HazMat Incident Report for further details). Analysis of the water sample by the County's certified Environmental Health Lab identified up to 610ppb benzene (please refer to attached laboratory analytical results).

The site began pumping groundwater from the tank pit and through the carbon filter drum and into the storm drain on February 13, 1997 in order to accomodate tank and piping installation work at the site. The use of this carbon filter system was approved by the Regional Water Quality Control Board (RWQCB) per my conversation with you on January 30, 1997. As part of this filter system, the County required that effluent water samples from the drum be collected at regular intervals to detect any breakthrough in the carbon. Water samples were collected every two to three days. On Friday, February 21, 1997, Bruce Hageman, the contractor collecting the effluent samples, obtained the analytical results of the effluent sample collected that Wednesday, February 19, 1997, and discovered that breakthrough had occurred on Wednesday with 880ppb TPHg and 1.5ppb benzene. Mr. Hageman called the property owner, Mr. Sappal, on that Friday, February 21, 1997, and requested that he immediately shut the filter system off. However, per the above ER incident report, this filter system was not shut off until Saturday night when Paul Smith turned it off. Per my conversation with Mr. Sappal on Monday, February 24, 1997, Mr. Sappal confirmed that he received the breakthrough warning from Mr. Hageman on February 21, 1997, and alleged that he sent someone to turn off the system on that day.

Mr. Rico Duazo  
Re: 1310 Central Ave.  
March 18, 1997  
Page 2 of 2

This office has presented the above information so that the RWQCB may determine what course of action, if any, it wishes to take on this matter. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

#### ATTACHMENTS

cc: Mr. Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



2022

January 28, 1997

Mr. Pritpaul Sappal  
Alaska Gas  
872 Coral Drive  
Rodeo, CA 94572

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

STID 3828

Re: Tank Installation and investigations at 1310 Central Ave., Alameda, CA

Dear Mr. Sappal,

On January 23, 1997, Mr. Fred Nattkemper, with Petrotek, contacted this office to report contaminated soils at the above site that caused his employees to become ill after excavating piping trenches. In response to his call, Larry Seto from our office went out to the site to inspect the situation on January 24, 1997. Per Mr. Seto's Inspection Report, trenching could continue after testing the soil with a combustible gas meter and getting permission to proceed from the County.

On January 28, 1997, I went out to the site and met with you and Mr. Nattkemper to inspect the situation. I brought out a Photovac photoionization detector to test the soil both in the trench and in the stockpiled soil. The Photovac identified 8ppm in the stockpiled soil and 0.5ppm in the trench. Approval was given to proceed with and complete the tank and piping installations, based on the low soil concentrations and the fact that additional soil and groundwater investigations will be conducted through the use of borings and monitoring wells after these installations are completed.

Per my conversation with you on January 28, 1997, please notify me when additional trenching will be conducted at the site, so that I may inspect the condition of the soils at the southwest end of the site.

Per my conversation with your consultants, Hageman & Aguiar, on January 24, 1997, a workplan for further investigations will be submitted to this office by February 14, 1997. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin  
Senior Hazardous Materials Specialist

Mr. Pritpaul Sappal  
Re: 1310 Central Ave.  
January 28, 1997  
Page 2 of 2

cc: Mr. Schivcharanjit Lal, 695 Harbour Bay, Richmond, CA 94801  
Larry Seto, ACDEH  
Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO# 22

Certified Mailer #P 386 338 213

December 17, 1996

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

Mr. Fred Nattkemper  
Petrotek  
P.O. Box 612317  
San Jose, CA 95161

RE: Alaska Oil, 1310 Central Avenue, Alameda, CA

Dear Mr. Nattkemper:

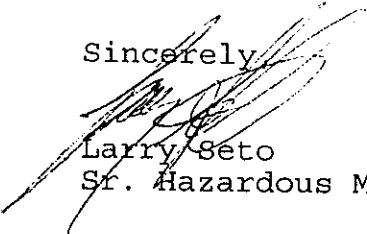
I stopped by the above location today, and noticed the two underground tanks that were placed in the ground on October 23, 1996 are covered with pea gravel. Please submit to this office within 5 days of the receipt of this letter your **written timetable** for completing your project at the site. This timetable should include, but shall not be limited to the following:

1. Estimated installation completion date for the primarily and secondary piping
2. Estimated date that the piping test will be performed
3. Estimated installation completion date for the tank monitoring system
4. Estimated date when you will be ready for a final inspection

Thank-you for your deposit/refund of \$936.00 which was received on November 13, 1996. That deposit was used for time spent from March 7, 1996 to October 25, 1996. The current balance on your account is -\$98.00. Please submit an additional deposit/refund check for the amount of \$936.00 with your timetable.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

cc: Pritpaul Sappal, Property & Tank Owner  
Captain Steve Mc Kinley, Alameda Fire  
Jun Makishima, Asst. Director Environmental Protection  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 22

November 26, 1996

Mr. Schivcharanjit Lal  
695 Harbour Bay  
Richmond, CA 94801

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

STID 3828

Re: Required investigations at 1310 Central Avenue, Alameda, California

Dear Mr. Lal,

On April 30, 1996, four underground storage tanks (USTs) were removed from the above site: one 10,000-gallon gasoline UST, one 7,500-gallon gasoline UST, one 5,000-gallon gasoline UST, and one 500-gallon waste oil UST. Soil samples were collected from the gasoline UST tank pit, the waste oil tank pit, and the areas beneath the dispensers. Additionally, "grab" groundwater samples were collected from the gas and waste oil tank pits. Samples collected from the waste oil tank pit were analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), Oil & Grease, chlorinated hydrocarbons (VOCs), heavy metals, polynuclear aromatic hydrocarbons (PNAs), and benzene, toluene, ethylbenzene, and xylenes (BTEX). Samples collected from beneath the dispensers and the gasoline tank pit were analyzed for TPHg and BTEX.

Analysis results of soil samples collected from the dispensers and gasoline tank pit identified up to 6,800 parts per million (ppm) TPHg, 63ppm benzene, 370ppm toluene, 120ppm ethylbenzene, and 680ppm xylenes. The "grab" groundwater sample collected from the gasoline tank pit identified 2,800 parts per billion (ppb) TPHg, 100ppb benzene, 60ppb toluene, and 560ppb xylenes. Analysis results of soil samples collected from the waste oil tank pit identified up to 3,000ppm Oil & Grease, 470ppm TPHg, 0.30ppm ethylbenzene, and 0.85ppm xylenes; and the analysis results of the "grab" groundwater sample collected from the waste oil tank pit identified up to 35,000ppb Oil & Grease, 1,300ppb TPHg, 1.6ppb xylenes, 453ppb lead, and 0.8ppb chloromethane. The TPHg identified in the soil and groundwater samples collected from the waste oil tank pit was not consistent with typical gas patterns.

Based on the above sample results, additional soil and groundwater investigations will be required per the Regional Water Quality Control Board's (RWQCB) guidelines and Article 11 Title 23 California Code of Regulations (please refer to attached RWQCB guidelines). The additional soil and groundwater investigations will be required to accomplish the following:

- 1) Determine whether the source of the contamination has been removed;
- 2) Adequately characterize the extent and severity of both soil and groundwater contamination;
- 3) Determine whether the groundwater contaminant plume is migrating;
- 4) Identify any sensitive receptors,

Mr. Schivcharanjit Lal  
Re: 1310 Central Avenue  
November 26, 1996  
Page 2 of 3

such as nearby domestic wells, etc. ; and 5) Determine whether the contamination poses any human health or ecological risk on site and on neighboring residential properties. The levels of soil and groundwater contamination at the site currently exceed the preliminary human health protective threshold values listed in the Tier 1 table of the American Society for Testing and Materials' Risk-Based Corrective Action guidelines (E 1739-95).

**This office is requesting that a workplan be submitted, addressing the above issues, within 60 days of the date of this letter (i.e., by January 21, 1996). Samples collected to further characterize the contamination from the waste oil UST shall be analyzed for TPHg, Oil & Grease, BTEX, and lead. Samples collected for the purposes of characterizing the contamination resulting from the gasoline USTs and dispensers shall be analyzed for TPHg and BTEX.**

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

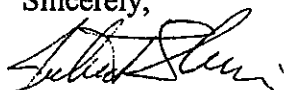
The State Water Resources Control Board has a Petroleum Underground Storage Tank Cleanup Fund available to sites to assist in investigations and cleanup. This office encourages you to look into applying to this fund. The address and phone number of the trust fund is:

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund Program  
2014 T Street, Ste 130  
P.O. Box 944212  
Sacramento, CA 94244-2120  
(916) 227-4307

Mr. Schivcharanjit Lal  
Re: 1310 Central Ave.  
November 26, 1996  
Page 3 of 3

If you have any questions about the fund, you can contact Cheryl Gordon at (916) 227-4530.  
Any other questions can be directed to me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

**ATTACHMENT**

cc: Pritpaul Sappal  
872 Coral Drive  
Rodeo, CA 94572

Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#22

November 26, 1996

Mr. Pritpaul Sappal  
Alaska Gas  
872 Coral Drive  
Rodeo, CA 94572

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

STID 3828

Re: Required investigations at 1310 Central Avenue, Alameda, California

Dear Mr. Sappal,

On April 30, 1996, four underground storage tanks (USTs) were removed from the above site: one 10,000-gallon gasoline UST, one 7,500-gallon gasoline UST, one 5,000-gallon gasoline UST, and one 500-gallon waste oil UST. Soil samples were collected from the gasoline UST tank pit, the waste oil tank pit, and the areas beneath the dispensers. Additionally, "grab" groundwater samples were collected from the gas and waste oil tank pits. Samples collected from the waste oil tank pit were analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), Oil & Grease, chlorinated hydrocarbons (VOCs), heavy metals, polynuclear aromatic hydrocarbons (PNAs), and benzene, toluene, ethylbenzene, and xylenes (BTEX). Samples collected from beneath the dispensers and the gasoline tank pit were analyzed for TPHg and BTEX.

Analysis results of soil samples collected from the dispensers and gasoline tank pit identified up to 6,800 parts per million (ppm) TPHg, 63ppm benzene, 370ppm toluene, 120ppm ethylbenzene, and 680ppm xylenes. The "grab" groundwater sample collected from the gasoline tank pit identified 2,800 parts per billion (ppb) TPHg, 100ppb benzene, 60ppb toluene, and 560ppb xylenes. Analysis results of soil samples collected from the waste oil tank pit identified up to 3,000ppm Oil & Grease, 470ppm TPHg, 0.30ppm ethylbenzene, and 0.85ppm xylenes; and the analysis results of the "grab" groundwater sample collected from the waste oil tank pit identified up to 35,000ppb Oil & Grease, 1,300ppb TPHg, 1.6ppb xylenes, 453ppb lead, and 0.8ppb chloromethane. The TPHg identified in the soil and groundwater samples collected from the waste oil tank pit was not consistent with typical gas patterns.

Based on the above sample results, additional soil and groundwater investigations will be required per the Regional Water Quality Control Board's (RWQCB) guidelines and Article 11 Title 23 California Code of Regulations (please refer to attached RWQCB guidelines). The additional soil and groundwater investigations will be required to accomplish the following: 1) Determine whether the source of the contamination has been removed; 2) Adequately characterize the extent and severity of both soil and groundwater contamination; 3) Determine whether the groundwater contaminant plume is migrating; 4) Identify any sensitive receptors,

Mr. Pritpaul Sappal  
Re: 1310 Central Avenue  
November 26, 1996  
Page 2 of 3

such as nearby domestic wells, etc. ; and 5) Determine whether the contamination poses any human health or ecological risk on site and on neighboring residential properties. The levels of soil and groundwater contamination at the site currently exceed the preliminary human health protective threshold values listed in the Tier 1 table of the American Society for Testing and Materials' Risk-Based Corrective Action guidelines (E 1739-95).

**This office is requesting that a workplan be submitted, addressing the above issues, within 60 days of the date of this letter (i.e., by January 21, 1996). Samples collected to further characterize the contamination from the waste oil UST shall be analyzed for TPHg, Oil & Grease, BTEX, and lead. Samples collected for the purposes of characterizing the contamination resulting from the gasoline USTs and dispensers shall be analyzed for TPHg and BTEX.**

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

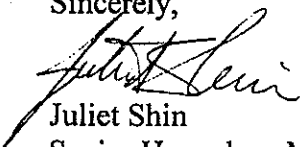
The State Water Resources Control Board has a Petroleum Underground Storage Tank Cleanup Fund available to sites to assist in investigations and cleanup. This office encourages you to look into applying to this fund. The address and phone number of the trust fund is:

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund Program  
2014 T Street, Ste 130  
P.O. Box 944212  
Sacramento, CA 94244-2120  
(916) 227-4307

Mr. Pritpaul Sappal  
Re: 1310 Central Ave.  
November 26, 1996  
Page 3 of 3

If you have any questions about the fund, you can contact Cheryl Gordon at (916) 227-4530.  
Any other questions can be directed to me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

**ATTACHMENT**

cc: Shivcharanjit Lal  
695 Harbour Bay  
Richmond, CA 94801

Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R022

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

October 29, 1996

ATTN: Mr Fred Nattkemper

Petrotek  
P O Box 612317  
San Jose CA 95161

RE: Project # 3341B - Type MOD  
at 1310 Central Ave in Alameda 94501

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 \$936.00, payable to Alameda County, Environmental Health Services.

We must receive this deposit so that future regulatory oversight on the subject site can procede in a timely fashion. At the completion of this project, any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 3-140.5 of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following on the check to identify your account:

- project #,
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Larry Seto at (510) 567-6774.

Sincerely,

Jun Makishima, Area Manager  
Environmental Protection

c: files/inspector  
Mr. Pritpaul Sappal

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO#22

ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

Certified Mailer #P 155 530 619

Alameda County Environmental Health Dept  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-657  
(510)567-6700 fax: (510)337-933

January 29, 1996

Mr. Pritpaul Sappal  
Alaska Gas  
5001 Cutting Blvd.  
Richmond, CA 94804

RE: 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

This letter is to confirm our telephone conversation today when you agreed to complete the closure of the underground tank that popped out of the ground. This tank is to be removed off-site. It is also my understanding that you will submit a completed closure plan for approval to this office by Friday, February 2, 1996.

If you have questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

cc: Mee Ling Tung, Supervisor, Environmental Protection  
Captain Steve McKinley, Alameda Fire



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Ro# 22  
ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

Certified Mailer #P 155 530 620

Alameda County Environmental Health Dept.  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577  
(510)567-6700 fax: (510)337-9335

January 29, 1996

Mr. Pritpaul Sappal  
Alaska Gas  
5001 Cutting Blvd.  
Richmond, CA 94804

**NOTICE OF VIOLATION**

RE: 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

This office has not received the information we requested in a letter to you dated November 20, 1995. The five items identified in that letter must be submitted to this office for approval before a five-year operating permit can be issued for your underground tanks.

In addition, the former waste oil tank must be registered using Storage Tank Permit Application - Form B.

Please submit the requested information above within 15 days of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto  
Sr. Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office  
Mee Ling Tung, Supervisor, Environmental Protection  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R022

RAFAT A. SHAHID, DIRECTOR

CERTIFIED MAILER# P 155 530 610

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

November 20, 1995

Mr Pritpaul Sappal  
Alaska Gas  
5001 Cutting Blvd  
Richmond CA 94804

RE: 1310 Central Ave, Alameda CA 94501

Dear Mr. Sappal:

A review of our files indicates there are four underground storage tanks at the above site. Three of the tanks were used to store motor fuel, and the fourth was used to store waste oil. Please register the waste oil tank using the enclosed Underground Storage Tank Permit Application - Form B, or provide written documentation that this tank has been removed within 15 days of the receipt of this letter.

Before this office can issue you a five-year permit to operate your underground tanks, the following information must be submitted for approval:

1. A written tank monitoring plan.
2. Results of precision tank and pipeline test.
3. Results of precision pipeline leak detector test.
4. An accurate and complete plot plan.
5. A written spill response plan.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

  
Larry Seto  
Sr. Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office  
Consumer and Environmental Protection  
Mee Ling Tung, Environmental Protection  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R022

RAFAT A. SHAHID, Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Environmental Protection Division  
1131 Harbor Bay Parkway, #250  
Alameda, CA 94502-6577  
(510) 567-6700

August 16, 1995

Mr. Pritpanal Sappal  
695 Harbour Way  
Richmond, CA 94801

Subject: 1310 Central Avenue, Alameda, CA 94501

Dear Mr. Sappal:

On August 10, 1995, I received a message from Fred of Petrotech that he will be performing a tank and pipeline test on August 21, 1995, at the above location. I will not be available to oversee the testing. Fred did not leave a telephone number, so I am writing to you because you are the property owner. Please have the test rescheduled with Larry Seto when he returns from vacation on August 22, 1995. His telephone number is 510-567-6774.

If you have any questions, please contact me at 510-567-6746.

Sincerely yours,

A handwritten signature in cursive script that reads "Don Hwang".

Don Hwang  
Hazardous Materials Specialist

DH:cmb

cc: Larry Seto

wp/6.0/Sappal.Hwang

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R022

RAFAT A. SHAHID, Assistant Agency Director

June 21, 1993  
STID # 3826 3828

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

Mr. David Duffy,  
Service Station Dealer  
Desert Petroleum Inc.  
1310 Central Ave.  
Alameda, California 94501

Re: FIVE YEAR UNDERGROUND TANK PERMIT FOR DAVE DUFFY AUTO SERVICE  
LOCATED AT, 1310 CENTRAL AVE., ALAMEDA

Dear Mr. Duffy:

Please find enclosed your five-year underground storage tank permit certificate. This permit is being issued for three fuel tanks and waste oil tank, at the site noted above. In order to maintain a valid permit, your monitoring procedures must comply with State regulations. These methods are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective August 9, 1991. In addition, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected immediately. Below is a summary of the monitoring requirements for your facility:

**1. Sections 2645 and 2646 - Inventory Reconciliation**

- a) Record the daily variation in inventory reconciliation. This is the difference between the measured inventory in the tank and the calculated inventory. The calculated inventory shall be determined by adding the fuel inputs from deliveries and subtracting the day's sales withdraws from the physically measured inventory of the day before. Weekly tank gauging can be utilized for the waste oil tank, following an initial integrity test.

Meters or gauges used to measure the in tank inventory must be approved by this office. Commercial gauges and measuring devices should meet the standards in Title 4, Chapter 9, of the California Code of Regulations (C.C.R.) and be inspected by the County Department of Weights and Measures.

Duffy Auto Service  
June 22, 1993  
Page 2 of 3

You are advised that after January 1, 1993, using manual stick readings to measure the physical inventory, may require your inventory reconciliation data to be evaluated by a third party certified statistical analyst. This rule applies where the highest anticipated ground water may come to less than 20 feet below the bottom of the tank.

Daily variations shall be summed for a period of one month. If monthly variations exceed 1% per cent of the monthly tank delivery plus 130 gallons, this office must be notified. An investigation as to the cause of excess variations must be conducted and reported to this office.

- b) Submit an annual statement to this office which states that all inventory reconciliation data are within allowable limits or list the times and corresponding variations when allowable limits were exceeded. This statement shall be executed under penalty of perjury.

## 2. Section 2643 - Non-visual Monitoring

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or a leak rate of three gallons per hour at 10 p.s.i. exists; and

Annual piping system integrity testing shall be conducted which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 (one and a one half times) normal operating pressure.

- b) Annual tank integrity testing shall be conducted which is capable of detecting a release of 0.1 gallon per hour at or above the maximum product level of the tank.

## 3. Section 2663 - Overfill Prevention

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.

Duffy Auto Service  
June 22, 1993  
Page 3 of 3

**4. Section 2643 et. seq., Non- Visual Monitoring**

- a) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment or conducting monitoring procedures. Maintain the plan on site for review.

**5. Section 2712 - Permit Conditions**

- a) Retain all monitoring and maintenance records on-site or at a readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.

Should you have any questions or concerns regarding the contents of this letter, please call me at (510)271-4320.

Sincerely,

  
Kevin Tinsley  
Hazardous Materials Specialist

cc: Pam Evans, Senior Haz. Mat. Specialist, AlCo. E.H.D.  
Brian Oliva, Haz. Mat. Specialist, AlCo. E.H.D.  
John Rutherford, Director of Env. Affairs, Desert Petroleum

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R022

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

Certified Mailer #: P 062 127 802

July 3, 1990

Mr. John Rutherford  
Desert Petroleum  
1310 Central Avenue  
Alameda, CA 94501

Re: Inventory Reconciliation Report for Desert Petroleum #784,  
1310 Central Avenue, Alameda, California

Dear Mr. Rutherford:

We have received the January through March 1990 inventory reconciliation summary report for the above facility. This inventory report reveals routine inventory fluctuations in excess of the allowable limits. Per Section 2644 (f) of the California Code of Regulations, Title 23, certain procedures must be observed when inventory reconciliation reveals a disparity either over or under the allowable limit specified in Section 2641 (c)(5)(B). To indicate you have followed the procedures in Section 2644 and investigated the cause of the disparities, we require submittal of a written explanation for the cause of these fluctuations within 30 days of the date of this letter.

Please feel free to contact me at 271-4320 should you have any questions.

Sincerely,

Katherine A. Chesick,  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Alameda County Environmental Health Department  
Files