

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
07-14-06

July 12, 2006

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

John Holland Estate
c/o Ms. Barbara Holland
PO Box 5
Kentfield, CA 94914

Mr. David Thompson dba Oak Construction
c/o Joseph Ryan, Esq.
Ryan & Lifter LLP
2010 Crow Canyon Place Suite 330
San Ramon, CA 94583

Mr. Gary and Karen Pearce
c/o of Kim O'Dinzel
Long and Levit LLP
465 California Street, 5th Floor
San Francisco, CA 94104

Ms. Gloria and Robert Peterson
c/o Lauri Sherwood, Esq.
Walsworth, Franklin, Beavins & McCall
601 Montgomery Street 9th Floor
San Francisco, CA 94101

Dear Messes. Holland and Peterson, Messrs. Thompson and Pearce:

Subject: Fuel Leak Case Number RO0000084, Holland Oil/ Pearce Property, 900 Central Avenue,
Alameda, CA 9450.

Alameda County Environmental Health (ACEH) staff have reviewed the case file for the above referenced site and have made the following determinations based on our review. According to the most recent documents available in our files, "Annual Groundwater Monitoring and Risk Assessment Report, dated December 2002", petroleum hydrocarbon contamination in groundwater is ongoing concern on site. Elevated concentrations of total petroleum hydrocarbon gasoline (TPHg), total petroleum hydrocarbon diesel (TPHd), benzene and methyl tertiary butyl ether (MTBE) have been detected in monitoring well MW-1 at 42,000 µg/L, 8,400 µg/L, 2,600 µg/L and 500 µg/L, respectively. Considering that there has been no work at the site in nearly four years, ACEH consider it appropriate to re-evaluate the site based on current groundwater conditions. Our request is based on the conclusion that the most recent groundwater monitoring data available in our files dates back to December 2002. In addition, proposed hydraulic gradient data indicate that offsite contamination plume migration may also be a concern.

ACEH does not consider the site to be adequately characterized, considering no soil data below 15 fbg. have been collected on site. However, soil analytical data collected in 1997 at 14.5 fbg from onsite boring P-3 tested 4,600 mg/kg TPHg, confirming the further investigation is needed. Furthermore, no offsite investigation has been performed to delineate the extent of possible hydrocarbon contamination down gradient of the site. Consequently, ACEH requests that you prepare a work plan to define the vertical and horizontal extent of contamination in soil and groundwater onsite and determine the possible extent of the dissolved petroleum hydrocarbon contamination immediately down gradient of the site.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL REPORT REQUEST

1. **Well Rehabilitation and Redevelopment.** Considering the length of time since the most recent sampling event, December 2002. ACEH requests that all three onsite monitoring wells be rehabilitated and/or redeveloped; thus allowing the collection of a representative sample of formation groundwater. Furthermore, well redevelopment may require additional purging to allow the water quality parameters to stabilize before sampling. The analytical results obtained from groundwater sampling should provide a clear picture of current groundwater conditions. Please describe and present the results of the well redevelopment and rehabilitation activities in the report requested below.
2. **Groundwater Monitoring and Sampling.** Groundwater monitoring and sampling has not been conducted at the site since December 2002. ACEH requests that all three onsite monitoring well be sample to determine current groundwater conditions throughout the site. The water samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results from groundwater monitoring and sampling in the report requested below.
3. **Source Area Characterization.** The Work Plan is to include a scope of work to characterize the lateral and vertical extent of contamination in the source area. ACEH requests that soil borings be extended to a depth that will adequately characterize the vertical extent of soil and groundwater contamination. We request that soils borings be continuously cored to assess the lithology and vertical extent of contamination. Please propose locations within the area of known shallow contamination that will help define the vertical extent of contamination on site. Please discuss your rational to determine soil borings depth and soil boring locations in the work plan requested below.
4. **Lateral and Vertical Delineation of Groundwater Contamination.** Given that no off site investigation has been conducted, ACEH requests that you propose a plan to define the lateral and vertical extent of groundwater contamination down gradient of your site. Please include you plans for plume delineation in the work plan requested below.

Soil boring data should be used to target sediments below the water table for depth-discrete groundwater sampling. Each coarse-grained layer that may represent a contaminant migration pathway is to be targeted for depth-discrete groundwater sampling. Depth-discrete groundwater samples are to be collected in a boring(s) adjacent to the logged soil boring using techniques that will prevent cross-contamination of separate water-bearing zones and contamination of the depth-discrete groundwater sample by contaminated groundwater from a shallower interval. Please present the proposed locations for vertical delineation on a sample location map and submit a description of the proposed method for depth-discrete groundwater sampling in the Work Plan requested below for ACEH approval prior to field activities.

5. **Soil Sampling and Analysis.** ACEH requests that one soil sample be collected approximately 2 feet to 5 feet above first groundwater, at distinct changes in lithology and at approximately 10 feet intervals until total depth of the boring is reached. In addition, ACEH requests that soil samples be submitted for laboratory analyses at all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number

Ms. Barbara Holland
July 12, 2006
Page 3

of soil samples from this interval should be submitted for laboratory analyses to characterize the contamination within this interval. The soil samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please include your proposal for this work in the work plan requested below.

6. **Groundwater Sampling.** The groundwater samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett) according to the following schedule:

- **August 15, 2006** – Groundwater Monitoring Report
- **August 30, 2006** – Work Plan for Soil and Groundwater Investigation

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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).

Ms. Barbara Holland
July 12, 2006
Page 4

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please contact me at (510) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist
Local Oversight Program

Enclosure

Ms. Barbara Holland
July 12, 2006
Page 5

cc: Mr. Brian Kelleher
Kelleher & Associates
812 Winchester Blvd.
San Jose, CA 95128

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05-10-06

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

May 5, 2006

John Holland Estate
c/o Edward Martins, Inc.
Professional Law Corp.
1164 A. Street
Hayward, CA 94541

Address to all RPs

Dear Mr. Martins:

Subject: Fuel Leak Case Number RO0000084, Holland Oil/ Pearce Property, 900 Central Avenue, Alameda, CA 9450.

Pursuant to the request from Kelleher & Associates, the following clarifies Alameda County Environmental Health's (ACEH) identification of responsible parties for the subject site. This letter also clarifies the primary responsible party identification for the subject site.

ACEH named John Holland Sr. of Holland Oil (John Holland Estate); Robert and Gloria Peterson; David and Michelle Thompson ET AL; and Gary and Karen Pearce as responsible parties for the subject site, as defined under the California Code of Regulations, specifically 23CCR Section 2720. Section 2720 defines a responsible party (RP) as any one of the following four ways:

First:

"Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."

Second:

"In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."

Third:

"Any owner of property of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."

Fourth:

"Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."

John Holland Estate owned the subject property from May 1971 to July 1976. John Holland Estate was the last owner-and operator of the underground storage tanks (UST) at the site. The USTs were associated with the former Holland Oil gasoline station. Therefore, Holland Oil meets the second and third definition of a responsible party. Additionally, as the last owner and operator of the USTs immediately before the discontinuation and removal of the USTs, Holland Oil is considered the primary responsible

party at the subject site.

Robert and Gloria Peterson Et Al owned the subject property from July 1976 to October 1978. Thus the Petersons meet the third definition of a responsible party.

David and Michelle Thompson owned the subject property from October 1978 to May 1985. Therefore, the Thompson's meet the third definition of a responsible party.

Gary and Karen Pearce are the current property owners and they have owned the property from May 1985 to present. Therefore, the Pearce's meet the third definition of a responsible party.

Accordingly, the County has determined that there are four responsible parties for the subject site, with the John Holland Estate as the primary responsible party. However, all responsible parties are considered jointly and severally liable for the corrective action at the subject site.

If you have any questions, please contact me at (510) 383-1767.

Sincerely,

Steven Plunkett
Hazardous Materials Specialist
Local Oversight Program

Enclosure

cc: Mr. Gary and Karen Pearce
c/o of Kim O'Dinzel
Long and Levit LLP
465 California Street, 5th Floor
San Francisco, CA 94104

Ms. Gloria and Robert Peterson
c/o Lauri Sherwood, Esq.
Walsworth, Franklin, Beavins & McCall
601 Montgomery Street 9th Floor
San Francisco, CA 94101

Mr. David Thompson dba Oak Construction
c/o Joseph Ryan, Esq.
Ryan & Lifter LLP
2010 Crow Canyon Place, Suite 330
San Ramon, CA 94583

Mr. Brian Kelleher
Kelleher & Associates
812 Winchester Blvd.
San Jose, CA 95128

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
03-18-04

March 17, 2004

RO0000084

Mr. David Thompson
C/O Kate Ebrahimi Ryan & Lifter LLP
210 Crow Canyon Pl
San Ramon, CA 94583

Mr. Gary Pearce
C/O R. Buccieri, Long & Levit LLP
601 Montgomery St. Suite 900
San Francisco, CA 94111

Mr. John Holland, Sr.
C/O Edward Martins, Esq.
22698 Mission Road
Hayward, CA 94541

Mr. Robert Peterson
C/O Laurie Sherwood, Esq.
580 California Street # 1335
San Francisco, CA 94104

RE: LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS
property at 900 Central Ave., Alameda, CA

Alameda County Environmental Health, Local Oversight Program (LOP), has reviewed information pertaining to the above referenced site. It appears that the contact information for the responsible parties (RPs) is not up to date. Please inform this office of any correction(s) necessary to update our records regarding addresses, responsible parties names, contacts names, phone numbers, etc.

Furthermore, there are three parcels indicated at the above referenced address with the following parcel numbers: 0073 - 0398-049-00 as 900 Central Ave., 073 -0398-050-00 as 900 Central Ave., #1, and 073 -0398-051-00 as 900 Central Ave., B. Please inform this office regarding the correct assessment number(s).

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

LANDOWNER NOTIFICATION

Re: 900 Central Ave., Alameda

March 17, 2004

Page 2 of 3

Additionally, 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.

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

LANDOWNER NOTIFICATION

Re: 900 Central Ave., Alameda

March 17, 2004

Page 3 of 3

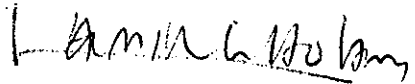
3) make a determination that no further action is required

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) 567-6876 if you have any questions about the content of this letter.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Betty Graham, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

"List of Landowners" form
(Sample Letter 2)

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (Site
name and address)
(to be filled in by the primary responsible party and mailed to
Alameda County)

(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

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

"Notice of Proposed Action" form
(Sample Letter 3)

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR
(site name and address)
(to be filled in by the primary responsible party and mailed to
Alameda county)

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



07-08-02

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

RO0000084

July 2, 2002

Mr. David Thompson
c/o Kate Friend
300 Lakeside Drive, Suite 1045
Oakland, CA 94612

RE: 900 Central Avenue, Alameda, CA

Dear Mr. Thompson:

I have completed review of All West's June 2002 *Quarterly Groundwater Monitoring Report* prepared for the above referenced site. Groundwater from all on-site wells was sampled in March 2002 and analyzed for TPHg, TPHd, TPHmo, BTEX, and ether oxygenates. None of the target analytes were detected in any of the groundwater samples.

At this time, I concur with All West's recommendation to discontinue analysis for ether oxygenates using EPA Method 8260B. However, please have the laboratory continue to quantify for MTBE using Method 8021B. It is also acceptable to delay the requirement of a risk assessment (RBCA) until further notice. Please include in subsequent monitoring reports the recent groundwater data into the tables of *Summary of Groundwater Elevation Measurements* and *Summary of Analytical Results*. Finally, this office requires only one copy of technical reports.

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

eva chu
Hazardous Materials Specialist

email: Mike Siembieda (All West)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



B-18-02

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

RO0000084

March 15, 2002

Mr. David Thompson
c/o Kate Friend
300 Lakeside Drive, Suite 1045
Oakland, CA 94612

RE: Work Plan Approval for 900 Central Ave., Alameda, CA

Dear Mr. Thompson:

I have completed review of AllWest Environmental Inc.'s March 2002 *Groundwater Monitoring and Risk Assessment Workplan* prepared for the above referenced site. The proposal to prepare a Conceptual Site Model (CSM), a Risk Based Corrective Analysis (RBCA) assessment, and to resume groundwater monitoring at the site is acceptable. Groundwater monitoring should resume as soon as possible. The CSM and RBCA assessment will be included in the next groundwater monitoring report.

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

eva chu
Hazardous Materials Specialist

email: Bob Horwath, All West

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-7-01

RO0000084

December 3, 2001

Mr. David Thompson
c/o Kate Friend
300 Lakeside Drive, Suite 1045
Oakland, CA 94612

RE: QMR for 900 Central Ave., Alameda, CA

Dear Ms. Tiers:

I have completed review of the case file for the above referenced site. Soil borings and groundwater monitoring wells installed at the site confirmed that groundwater beneath the site has been impacted with petroleum hydrocarbons. Groundwater sampling was conducted for four consecutive quarters, from November 1998 to September 1999. The last sampling event showed an increase in concentrations of petroleum hydrocarbons. To my knowledge, no other investigations were conducted since September 1999.

At this time, quarterly groundwater monitoring should be re-instated and continue until it has been demonstrated that the contaminant plume is stable and not migrating. Quarterly monitoring reports (QMRs) are also due 90 days upon completion of field work.

In October 1999, the consultants for the project site recommended that a risk based corrective action (RBCA) analysis be prepared for the site. This agency concurs that a RBCA analysis should be prepared where site specific target levels are established for the site. A workplan for the preparation of a RBCA is due within 60 days of the date of this letter, or by **February 5, 2002**.

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.

eva chu
Hazardous Materials Specialist

c: Ann Marie Holland Tiers, 1498 Hamrick Lane, Hayward, CA 94541
Gray Pearce, 550 Montgomery St., 8th Floor, San Francisco, CA 94111

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-4-01

RO0000084

December 3, 2001

Ann Marie Holland Tiers
1498 Hamrick Lane
Hayward, CA 94541

RE: QMR for 900 Central Ave., Alameda, CA

Dear Ms. Tiers:

I have completed review of the case file for the above referenced site. Soil borings and groundwater monitoring wells installed at the site confirmed that groundwater beneath the site has been impacted with petroleum hydrocarbons. Groundwater sampling was conducted for four consecutive quarters, from November 1998 to September 1999. The last sampling event showed an increase in concentrations of petroleum hydrocarbons. To my knowledge, no other investigations were conducted since September 1999.

At this time, quarterly groundwater monitoring should be re-instated and continue until it has been demonstrated that the contaminant plume is stable and not migrating. Quarterly monitoring reports (QMRs) are also due 90 days upon completion of field work.

In October 1999, the consultants for the project site recommended that a risk based corrective action (RBCA) analysis be prepared for the site. This agency concurs that a RBCA analysis should be prepared where site specific target levels are established for the site. A workplan for the preparation of a RBCA is due within 60 days of the date of this letter, or by February 5, 2002.

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.

eva chu
Hazardous Materials Specialist

c: Dave Thompson, c/o Michael Hawbecker, 111 Pine St., 12th Fl, San Francisco, CA
94111-5614
Gray Pearce, 550 Montgomery St., 8th Floor, San Francisco, CA 94111



February 22, 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. David Thompson, Former Property Owner
C/o Ms. Vickki Barron
Ryan, Andrada & Lifter
300 Lakeside Drive, Suite 1045
Oakland, CA 94612
STID 6897

RE: 900 Central Avenue, Alameda, CA 94501

Dear Mr. Thompson:

I would like to clarify my letter dated February 17, 1999. The State of California, Regional Water Quality Control Board requires the monitoring wells at the above site be sampled and monitored on a quarterly basis for a minimum of one year during a year of normal rainfall. Once this is performed, your monitoring schedule can be reviewed for modification.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Vickki Barron, Ryan, Andrada & Lifter, 300 Lakeside Drive, Suite 1045,
Oakland, CA 94501
Long Ching, AllWest Environmental, 1 Sutter Street, Suite 600, San Francisco,
CA 94101
Ted Sykes, AllWest Environmental, 1 Sutter Street, Suite 600, San Francisco,
CA 94101

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 84

February 17, 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. David Thompson, Former Property Owner
C/o Ms. Vickki Barron
Ryan, Andrada & Lifter
300 Lakeside Drive, Suite 1045
Oakland, CA 94612
STID 6897

RE: 900 Central Avenue, Alameda, CA 94501

Dear Mr. Thompson:

I have reviewed the Groundwater Monitoring Well Installation and Sampling Report dated February 2, 1999 for the above site that was prepared by AllWest Environmental. This office concurs with your consultant's recommendation that the newly installed monitoring wells be monitored and sampled on a quarterly basis for a year.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Vickki Barron, Ryan, Andrada & Lifter, 300 Lakeside Drive, Suite 1045,
Oakland, CA 94501
Long Ching, AllWest Environmental, 1 Sutter Street, Suite 600, San Francisco
CA 94104
Ted Sykes, AllWest Environmental, 1 Sutter Street, Suite 600, San Francisco,
CA 94104

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#84

August 3, 1998

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

Mr. David Thompson, Former Property Owner
C/o Ms. Vickki Barron
Ryan, Andrada & Lifter
300 Lakeside Drive, Suite 1045
Oakland, CA 94612
STID 6897

RE: 900 Central Avenue, Alameda, CA 94501

Dear Mr. Thompson:

I have reviewed the Workplan for Groundwater Monitoring Well Installation and Sampling dated June 29, 1998 that was prepared by AllWest Environmental. It is acceptable with the condition that the groundwater samples also be analyzed for TPH (diesel) and TPH (motor oil). Note: Up to 16,000 ppb TPH (diesel) and 820 ppb TPH (motor oil) were detected in the groundwater samples taken in April 1994.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Vickki Barron, Ryan Andrada & Lifter, 300 Lakeside Drive, Suite 1045 Oakland,
CA 94501
Long Ching, AllWest Environmental, 1 Sutter Street, Suite 600, San Francisco,
CA 94104
Ted Sykes, AllWest Environmental, 1 Sutter Street, Suite 600, San Francisco,
CA 94104
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 84

May 28, 1998

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

Mr. Ted Sykes
AllWest Environmental, Inc.
One Sutter Street, Suite 600
San Francisco, CA 94104
STID 6897

RE: 900 Central Avenue, Alameda, CA

Dear Mr. Sykes:

I have received your request dated May 18, 1998 for a second extension for submitting a monitoring well installation workplan. Your request to submit your workplan by June 30, 1998 is acceptable.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Vikki Barron, Esq. – Ryan, Andrada & Lifter, 300 Lakeside Drive, Suite 1045,
Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#84

April 15, 1998

Mr. Ted Sykes
AllWest Environmental, Inc.
One Sutter Street, Suite 600
San Francisco, CA 94104

RE: 900 Central Avenue, Alameda, CA

Dear Mr. Sykes:

I have received your letter dated April 9, 1998, for Ms. Vikki Barron, Esq. requesting an extension for the submission of the monitoring well workplan until May 15, 1998. Your request is granted.

If you have any questions, please contact me at (510) 667-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Vikki Barron, Ryan, Andrada & Lifter, 300 Lakeside Drive, Suite #1045,
Oakland, CA 94612

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



R0# 84

March 9, 1998

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Dave Thompson, Former Property Owner
C/o M. Vickki Barron
Ryan, Andrada & Lifter
300 Lakeside Drive, Suite 1045
Oakland, CA 94612
STID 6897

RE: 900 Central Avenue, Alameda, CA 94501

Dear Mr. Thompson:

I spoke with Mr. Ted Sykes and Mr. Long Ching of AllWest Environmental concerning the proposed monitoring schedule for the monitoring wells that will be installed at the above site. Grab water samples, collected on June 30, 1997 contained up to 92000, 610, 5000, 4600, and 24000 ppb of TPH(g), benzene, toluene, ethyl benzene and xylenes respectively. Groundwater at this site should be monitored on a quarterly basis, for a minimum of one year (This monitoring schedule is standard in the San Francisco Bay Region for this size of release). At a minimum, all samples submitted to the laboratory for analysis must be tested for the presence of TPH(g), benzene, toluene, ethylbenzene, ethylbenzene and methyl tertiary butyl ether (MTBE). After a year of monitoring, your monitoring schedule can be reviewed for modification.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Gray & Karen Pearce, Property Owner
Robert Peterson, Former property owner
Estate of John Holland, Sr., c/o Edward Martins Esq.
Long Ching, AllWest Environmental
Ted Sykes, AllWest Environmental
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#84

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

February 4, 1998

Mr. Dave Thompson
C/o M. Vikki Barron
Ryan, Andrada & Lifter
300 Lakeside Drive, Suite 1045
Oakland, CA 94612
STID 6897

RE: 900 Central Avenue, Alameda, CA 94501

Dear Mr. Tompson:

Madhulla Logan and I have reviewed the Subsurface Investigation Report dated August 5, 1997 prepared by AllWest Environmental and the Soil and Ground Water Quality Reconnaissance dated July 20, 1994 prepared by Lowney Associates. Ground water samples taken in April 1994 contained up to 76,000 ppb, 16,000 ppb, and 2,200 ppb of TPH(g), TPH(d), and benzene respectively. Groundwater samples taken in June 1997 contained up to 92,000 ppb, 610ppb, 5,000 ppb, 4,600 ppb and 24,000 ppb of TPH(g), and BTEX respectively.

Before a RBCA Tier II evaluation is performed, more information and data needs to be collected. No soil samples were taken from the former station/garage area, the status of the contaminated soil has not been determined (in place or removed), and groundwater gradient for the site has not been identified.

An additional investigation needs to be conducted to define the extent of the groundwater and soil contamination. As per Title 23, California Code of Regulations, Article 11, you are required to submit a Soil and Water Investigation workplan within 45 days of the receipt of this letter. A California-registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer must prepare this workplan.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Gray & Karen Pearce, Current Property Owner
Robert Peterson, Former Property Owner
Estate of John Holland, Sr., c/o Edward Martins Esq.
Long Ching, All West Environmental, Inc.
Madhulla Logan
Files