

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

July 7, 2006

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

Subject: Fuel Leak Case No. RO0000085, Oakland Truck Stop, 8255 San Leandro Street, Oakland, CA

Dear Mr. Saidian:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Diesel UST and Line Testing," dated June 28, 2006, prepared on your behalf by Aqua Science Engineers. The document summarizes the results of UST and product line testing conducted between February 20, 2006 and June 5, 2006. The results indicate that the diesel USTs were shown to be tight but the diesel product piping failed the leak test on May 18, 2006. On June 5, 2006, the lines passed the test and no leaks could be located. Due to concerns regarding potential ongoing releases of diesel fuel and the apparently conflicting line testing results, we request that you have a third party (other than the firms that performed the May 18, 2006 and June 5, 2006 tests) conduct a product line test to confirm the previous results.

In correspondence dated December 16, 2006, ACEH indicated that ozone sparging may be an effective remedial technology for the gasoline release in the southern portion of the site; however, we had several technical comments that may affect the design and effectiveness of the ozone sparging system. Therefore, we requested that you provide a response to the technical comments prior to ACEH concurrence with the proposed ozone sparging. The "Response to December 16, 2005 Letter," dated May 23, 2006, included plans to conduct the requested site investigation activities and provided much of the requested information. Based on the information provided, the proposal to conduct ozone sparging in the southern portion of the site is approved.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **August 15, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **August 24, 2006** - Third Party Diesel Piping Test Results
- **October 10, 2006** - Soil and Groundwater Investigation Report

- **November 15, 2006 - Quarterly Monitoring Report for the Third Quarter 2006**

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

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).

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

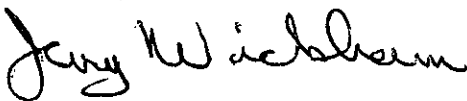
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Allen
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Robert Kitay
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 9, 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
 - or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of: **ftp Site Coordinator**.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**

- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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06-02-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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June 2, 2006

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

Subject: Fuel Leak Case No. RO0000085, Oakland Truck Stop, 8255 San Leandro Street, Oakland, CA

Dear Mr. Saidian:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Response to December 16, 2005 Letter," dated May 23, 2006, prepared on your behalf by Aqua Science Engineers. The "Response to December 16, 2005 Letter," addresses technical comments provided by ACEH in correspondence dated December 16, 2005. Included as an appendix to the "Response to December 16, 2005 Letter," is a Work Plan to conduct previously requested investigation activities.

Due to the lack of compliance with previous ACEH requests, ACEH recommended in our May 5, 2006 correspondence that the Underground Storage Tank Cleanup Fund no longer reimburse you for future work until the site is brought back into compliance. Based on the plans and information presented in the "Response to December 16, 2005 Letter," the case has been brought back into compliance with ACEH requests and we withdraw our request that the Underground Storage Tank Cleanup Fund no longer reimburse you. The "Response to December 16, 2005 Letter," includes plans to conduct the requested site investigation activities and provides much of the requested information. For items with missing information, such as the results of leak tests on the diesel line, the document generally presented plans to obtain the missing information.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Source of Diesel Fuel.** The "Response to December 16, 2005 Letter," indicates that the diesel piping was tested on May 18, 2006 and that the results would be presented when available. Please present these results **no later than July 6, 2006.**
2. **Proposed Treatment Area.** The proposed installation of temporary wells in the vicinity of monitoring well MW-1 to define the extent of free product (Task 5) is acceptable. Please present the results of the free product thickness measurements and water sampling in the Soil and Groundwater Investigation Report requested below.

3. **Pipeline along Southern Property Boundary.** The proposal to conduct further research, potentially including subsurface line locating and obtaining a video of the pipeline along the southern property boundary (Task 1), is acceptable. Please provide further information on the purpose, depth, dimensions, and type of backfill for the pipeline. Please show the location of the pipeline on a site plan and identify the off-site receptors for discharge to both the pipeline and trench backfill. Please evaluate whether the trench backfill provides a preferential pathway to the creek southwest of the site. If further field investigation is required in order to assess whether this pipeline or the backfill is a migration pathway, please advance additional borings to obtain this information. Please present the results of the additional research in the Soil and Groundwater Investigation Report requested below.
4. **Preferential Pathways.** The proposed conduit survey (Task 1) is acceptable. Please present the results of the conduit survey in the Soil and Groundwater Investigation Report requested below.
5. **Groundwater Flow Direction.** The explanation regarding the usefulness of rose diagrams is acceptable. Therefore a rose diagram is not required. Since tides in San Francisco Bay are mixed and frequently have a large inequality in the diurnal tides, please review the tide tables to select a day in which the water level measurements can be collected following the lower low and higher high tides (Task 10). A minimum of two water level measurements from each well are to be collected approximately two hours after lower low tide and two hours after higher high tide. Please include these results in the Soil and Groundwater Investigation Report requested below.
6. **Extent of Shallow Soil and Groundwater Contamination.** The proposed locations and scope of work for the shallow soil borings (Task 6) are acceptable. At a minimum, we request that one soil sample collected from the capillary fringe be submitted for laboratory analyses from each boring. If contamination is observed, soil samples are to be submitted for laboratory analyses for all depth intervals where the 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 of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please present the results of the soil and groundwater sampling in the Soil and Groundwater Investigation Report requested below.
7. **Vertical Extent of Soil and Groundwater Contamination.** We concur with the proposed locations and scope of work for the deeper soil borings (Task 7). At a minimum, we request that one soil sample collected from the capillary fringe and one soil sample collected at the first lithologic change below first-encountered groundwater be submitted for laboratory analyses from each boring. If staining, odor, or elevated PID readings are observed, soil samples are to be submitted for laboratory analyses for all depth intervals where the 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 of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please present the results of the soil and groundwater sampling in the Soil and Groundwater Investigation Report requested below.
8. **Monitoring Performance of Ozone Sparging System.** We concur with the proposed installation of an additional monitoring well to monitor the performance of the proposed ozone

sparging system. The installation of a 2-inch diameter monitoring well screened from approximately 4 to 14 feet bgs is acceptable. Please note that the well screen depths cited on Figure 3 – Typical Monitoring Well Construction are not consistent with the text and are not to be implemented. Please present the results in the Soil and Groundwater Investigation Report requested below

9. **Free Product Removal.** Please update the information regarding free product removal, as necessary, in future Quarterly Monitoring Reports requested below.
10. **Unknown USTs at Site.** The Subtronics report on the survey conducted at the site to locate possible USTs (Appendix E of "Response to December 16, 2005 Letter") provided geophysical data to indicate that unknown USTs were not present in the area surveyed but could not preclude the possibility of unknown USTs within an area of reinforced concrete. The report recommended further investigation, possibly using ground-penetrating radar, in the area of reinforced concrete. We request that ground-penetrating radar be used to confirm that unknown USTs are not present in the area of reinforced concrete. Please present the results in the Soil and Groundwater Investigation Report requested below. The figures showing geophysical survey results in Appendix E were not clear in the electronic report. Therefore, we request that you submit both the figures from the February 7, 2004 gradient survey by Subtronics and future figures from the ground-penetrating radar survey in the Soil and Groundwater Investigation Report requested below (required electronic document) and also separately as paper copies.
11. **Free Product Analysis.** We concur with the proposal to collect a sample of the free product and have the sample analyzed to assess the type and age of the fuel. Please present these results in the Quarterly Monitoring Report for the Second Quarter 2006 requested below.
12. **Quarterly Monitoring.** Quarterly groundwater monitoring is to be continued for the site. Please present your results in the quarterly monitoring reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **July 6, 2006** – Diesel Piping Test Results
- **August 15, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **October 10, 2006** – Soil and Groundwater Investigation Report
- **November 15, 2006** - Quarterly Monitoring Report for the Third Quarter 2006

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

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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 call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Allen
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Robert Kitay
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SOVT
05-08-06

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

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

Subject: Fuel Leak Case No. RO0000085, Oakland Truck Stop, 8255 San Leandro Street, Oakland, CA

Dear Mr. Saidian:

Alameda County Environmental Health (ACEH) staff previously requested in correspondence dated December 16, 2005 (copy attached) that you submit a Response to Comments and Revised Site Characterization Work Plan to complete site characterization for your site by February 17, 2006. To date, we have not received a Work Plan or a request for a schedule extension. **Your site is out of compliance with directives from this agency.**

In order for your site to return to compliance, please **submit the previously requested Response to Comments and Site Characterization Work Plan by May 30, 2006.** This date is not an extension of your due date, reports for this site are late and your site is out of compliance. ACEH's December 16, 2005 correspondence, which describes the requirements for the work, is included as an attachment. Due to the lack of compliance with ACEH requests, ACEH recommends that the Underground Storage Tank Cleanup Fund no longer reimburse you for future work until the site is brought back into compliance.

Please note that we have started the enforcement process on this case by requesting a revocation of your eligibility to receive grant money from the state's Underground Storage Tank Fund (Senate Bill 2004) to reimburse you for the cost of investigation and cleanup. Further delays in investigation, late reports, or enforcement actions may result in referral of 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.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **May 30, 2006** – Response to Comments and Revised Site Characterization Work Plan

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

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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 jerry.wickham@acgov.org.

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.

Mr. Nissan Saidian
May 5, 2006
Page 3

UNDERGROUND STORAGE TANK CLEANUP FUND

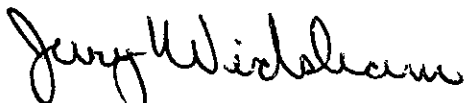
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Attachment: ACEH Correspondence Dated December 16, 2005

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828
Shari Knierem, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828

David Allen, Aqua Science Engineers, Inc., 208 West El Pintado, Danville, CA 94526

Robert Kitay, Aqua Science Engineers, Inc., 208 West El Pintado, Danville, CA 94526

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Scout
12-16-05

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

December 16, 2005

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

Subject: Fuel Leak Case No. RO0000085, Oakland Truck Stop, 8255 San Leandro Street, Oakland, CA

Dear Mr. Saidian:

I am the caseworker recently assigned to your case. Please send future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the reports entitled, "Soil and Groundwater Assessment, Sensitive Receptor Survey, Tier 1 Risk Assessment, and Corrective Action Plan," dated October 23, 2002, "Work Plan for Additional Soil and Groundwater Assessment," dated December 4, 2003, "Results of Pilot Study and Remedial Action Work Plan for the Installation of an Ozone Sparging System," dated April 7, 2004, and "Quarterly Groundwater Monitoring Report, April 6, 2005 Groundwater Sampling," dated May 23, 2005. All reports were prepared on your behalf by Aqua Science Engineers.

Both gasoline and diesel fuel have been detected at elevated concentrations at the site. The gasoline and diesel are from separate releases with the highest concentrations of gasoline and diesel fuel occurring in different areas of the site. The source of the diesel fuel is unknown (please see technical comment 1 below).

Based on the results of a pilot test, installation of an ozone sparging system in the southern portion of the site was proposed in the April 7, 2004 Remedial Action Work Plan (RAP). Ozone sparging may be an effective remedial technology for the gasoline release in the southern portion of the site. The technical comments below include several issues that may affect the design and effectiveness of the ozone sparging system. Therefore, prior to ACEH concurrence with the proposed ozone sparging, we request that you provide a response to the technical comments below **by February 17, 2006**. No revisions to the RAP are currently required; however, revisions to the RAP may be required based on the responses to the technical comments below.

The December 4, 2003 Site Characterization Work Plan proposed a scope of work for additional site characterization. This proposed scope of work has apparently not been implemented. Technical comments on the proposed tasks are included below. We request that you address the technical comments below and revise the proposed scope of work to complete site characterization accordingly. Please prepare a revised Site Characterization Work Plan along with the response to technical comments for submittal by February 17, 2006.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Source of Diesel Fuel.** Free phase product has been consistently measured in monitoring well MW-1 since the well was installed in 1999. During the groundwater monitoring event in April 2005, 1.4 feet of free product was measured in well MW-1. The source of the diesel fuel release is unknown but may be from a leak in the product piping or surface spillage. The continued presence of free product in well MW-1, which is located adjacent to the fuel dispensers, is of concern and must be addressed. Please describe what steps have been taken to determine the source of the diesel fuel. If the source of the diesel fuel is not known, please propose steps to assess whether the tank and piping system may be leaking. A sample of the free product is to be collected from well MW-1 and analyzed to assess whether the fuel is from a recent release. The potential for an ongoing release of diesel fuel must be addressed. Please describe any upgrade activities for the diesel system that have take place since 1999. This information is to be included in the Response to Comments requested below.
2. **Proposed Treatment Area.** The proposed ozone sparging system will treat contamination within the southern portion of the site. Elevated concentrations of fuel hydrocarbons have been detected in the area of the dispensers. Free product has been detected consistently in well MW-1 since 1999. In addition, the extent of free product in the area of the dispensers has not been defined. Please describe plans to address the elevated concentrations of diesel contamination and free product in the northern portion of the site. Please discuss this issue in the Response to Comments requested below.
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4. **Preferential Pathways.** In addition to the pipeline discussed in comment 2, other utility lines and trenches (including sewers, storm drains, pipelines, and trench backfill within the vicinity of the site) may act as preferential pathways for contaminant movement are to be evaluated. This scope of work was previously proposed as Task 2 in the December 4, 2003 Site Characterization Work Plan but no results of a conduit survey have been received by ACEH. The depth of utilities is to be compared to current and potential future groundwater elevations

to assess whether utilities are likely or potential preferential pathways for contaminant movement. The locations and depths for utilities located within proximity to the site are to be plotted on a site map. Please include this previously proposed scope of work (Task 2 of the December 4, 2003 Site Characterization Work Plan) in the revised Site Characterization Work Plan requested below.

5. **Groundwater Flow Direction.** The groundwater flow direction at the site is described as inconsistent. The Conceptual Site Model in the December 4, 2003 report speculates that the inconsistent hydraulic gradient is probably related to tidal influence from the deep utility line on the southern edge of the property. We request that you provide a rose diagram showing historic hydraulic gradients at the site. In addition, please propose a minimum of two water level measurements, one approximately two hours after low tide and one two hours after high tides on the same day in the wells along the southern boundary of the property to assess whether groundwater in this area is subject to tidal influence. Please include these plans in the revised Site Characterization Work Plan requested below.
6. **Extent of Shallow Soil and Groundwater Contamination.** Task 6 of the December 4, 2003 Site Characterization Work Plan proposed three shallow soil borings to collect soil and groundwater samples in the western and northwestern portions of the property and one off-site soil boring beneath the BART tracks on the northeast side of San Leandro Street. ACEH concurs with the proposed borings locations but requests additional shallow borings as follows: two additional borings on the east side of San Leandro Street and a minimum of two additional borings to define the extent of contamination south of the site. Please present plans for these additional borings in the revised Site Characterization Work Plan requested below.
7. **Vertical Extent of Soil and Groundwater Contamination.** Task 7 of the December 4, 2003 Site Characterization Work Plan proposed two deeper soil borings adjacent to wells MW-3 and MW-9, respectively. ACEH concurs with these two proposed boring locations but requests that additional deeper borings also be advanced as follows: one additional deeper boring between MW-1 and MW-3, one additional deeper boring between BH-F and BH-G. Please consider the need for one additional deeper boring in the area north of the dispensers. Please propose a minimum of two additional deeper borings in the Revised Site Characterization Work Plan requested below.
8. **Monitoring Performance of Ozone Sparging System.** The April 7, 2004 RAP indicates that the existing monitoring wells will be used to verify that ozone is being distributed as designed. However, no monitoring wells are currently located within the eastern half of the treatment area. Please review the adequacy of the existing well network to monitor the performance of the ozone sparging system. Please propose any additional monitoring wells in the revised Site Characterization Work Plan requested below.
9. **Free Product Removal.** Free product removal is reported to be occurring periodically at the site from well MW-1. However, no documentation of the dates, measured product thickness, and volumes removed has been provided. Please provide a table to indicate the dates product was removed, the measured thickness of free product in the well prior to removal, the volume removed, and the cumulative volume removed from well MW-1. Please provide this information in the Response to Comments and Quarterly Monitoring Reports requested below.

10. **Unknown USTs at Site.** The December 4, 2003 Site Characterization Work Plan proposed to use a subsurface utility locating service to look for additional unknown USTs. Please provide these results if a survey was conducted to look for a UST or complete the survey to confirm that no additional USTs are present at the site.
11. **Free Product Analysis.** Please collect a sample of the free product from well MW-1 and have the sample analyzed to assess the type and age of the fuel. Please present these results in the Quarterly Monitoring Report for the First Quarter 2006 requested below.
12. **Quarterly Monitoring.** Quarterly groundwater monitoring is to be continued for the site. Please present your results in the quarterly monitoring reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **February 17, 2006** – Response to Comments and Revised Site Characterization Work Plan
- **February 28, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005
- **May 31, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005

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

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.

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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).

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 jerry.wickham@acgov.org.

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.

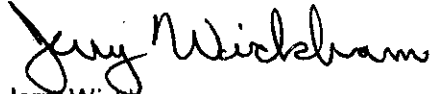
AGENCY OVERSIGHT

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.

Nissan Saidian
December 16, 2005
Page 6

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Allen
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Robert Kitay
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

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

December 16, 2005

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

Subject: Fuel Leak Case No. [REDACTED], Oakland Truck Stop, 8255 San Leandro Street, Oakland, CA

Dear Mr. Saidian:

I am the caseworker recently assigned to your case. Please send future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the reports entitled, "Soil and Groundwater Assessment, Sensitive Receptor Survey, Tier 1 Risk Assessment, and Corrective Action Plan," dated October 23, 2002, "Work Plan for Additional Soil and Groundwater Assessment," dated December 4, 2003, "Results of Pilot Study and Remedial Action Work Plan for the Installation of an Ozone Sparging System," dated April 7, 2004, and "Quarterly Groundwater Monitoring Report, April 6, 2005 Groundwater Sampling," dated May 23, 2005. All reports were prepared on your behalf by Aqua Science Engineers.

Both gasoline and diesel fuel have been detected at elevated concentrations at the site. The gasoline and diesel are from separate releases with the highest concentrations of gasoline and diesel fuel occurring in different areas of the site. The source of the diesel fuel is unknown (please see technical comment 1 below).

Based on the results of a pilot test, installation of an ozone sparging system in the southern portion of the site was proposed in the April 7, 2004 Remedial Action Work Plan (RAP). Ozone sparging may be an effective remedial technology for the gasoline release in the southern portion of the site. The technical comments below include several issues that may affect the design and effectiveness of the ozone sparging system. Therefore, prior to ACEH concurrence with the proposed ozone sparging, we request that you provide a response to the technical comments below by **February 17, 2006**. No revisions to the RAP are currently required; however, revisions to the RAP may be required based on the responses to the technical comments below.

The December 4, 2003 Site Characterization Work Plan proposed a scope of work for additional site characterization. This proposed scope of work has apparently not been implemented. Technical comments on the proposed tasks are included below. We request that you address the technical comments below and revise the proposed scope of work to complete site characterization accordingly. Please prepare a revised Site Characterization Work Plan along with the response to technical comments for submittal by February 17, 2006.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Source of Diesel Fuel.** Free phase product has been consistently measured in monitoring well MW-1 since the well was installed in 1999. During the groundwater monitoring event in April 2005, 1.4 feet of free product was measured in well MW-1. The source of the diesel fuel release is unknown but may be from a leak in the product piping or surface spillage. The continued presence of free product in well MW-1, which is located adjacent to the fuel dispensers, is of concern and must be addressed. Please describe what steps have been taken to determine the source of the diesel fuel. If the source of the diesel fuel is not known, please propose steps to assess whether the tank and piping system may be leaking. A sample of the free product is to be collected from well MW-1 and analyzed to assess whether the fuel is from a recent release. The potential for an ongoing release of diesel fuel must be addressed. Please describe any upgrade activities for the diesel system that have taken place since 1999. This information is to be included in the Response to Comments requested below.
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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).

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 jerry.wickham@acgov.org.

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

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UNDERGROUND STORAGE TANK CLEANUP FUND

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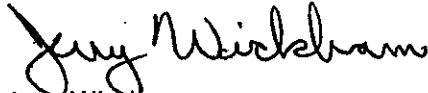
AGENCY OVERSIGHT

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Nissan Saidian
December 16, 2005
Page 6

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Allen
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Robert Kitay
Aqua Science Engineers, Inc.
208 West El Pintado
Danville, CA 94526

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
4-6-05

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

March 31, 2005

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

Dear Mr. Saidian:

**Subject: Fuel Leak Case #RO0000085, Oakland Truck Stop, 8255
San Leandro St., Oakland, CA 94621**

Alameda County Environmental Health staff has reviewed the April 7, 2004, Result of Pilot Study and Remedial Action workplan (RAP), For the Installation of an Ozone Sparging System by Mr. Robert Kitay of Aqua Science Engineers, Inc. as well as other documents available regarding the above referenced site. You are hereby required to complete a Soil and Water Investigation and prepare a Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 92-49, "Policies and Procedures for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and with the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and cleanup performance objectives that shall be considered as part of the required Soil and Water Investigation and CAP. We request that you prepare and submit a work plan for the Soil and Water Investigation by November 23, 2004, that addresses each of the following technical comments.

TECHNICAL COMMENTS

Plume Delineation:

Please investigate and evaluate the nature and extent of free product as well as the petroleum saturated soils and dissolved hydrocarbon in groundwater This is being requested due to the fact that there has been consistent floating product detected in MW-1 from the very beginning. Please provide your proposal for source characterization in the work plan requested below. Additionally please perform a floating product analysis.

Conduit Study:

Please perform a conduit study that details the potential migration pathways and potential conduits (utilities, storm drains, etc.) that may be present in the vicinity of the site. Furthermore, please provide a map showing the location and depth of all utility lines and trenches including sewers and storm drains within and near the plume area.

Flow Gradient:

We request that you properly characterize the hydrogeology and groundwater flow conditions in the vicinity of your site. There have been numerous irregularities in the groundwater flow gradients since the beginning of this project as evidenced by flow gradient maps provided to this office. Furthermore, please calculate groundwater gradient.

Free Product:

We request that you continue the weekly bailing of free-floating product in monitoring well MW-1 until no measurable free-product can be measured. Additionally please provide a workplan to include remedial activity beside the present bailing technique to address the persistent floating product issue in MW-1 well.

We request that you continue monitoring the groundwater contaminant plumes on a quarterly basis unless otherwise indicated by this office.

Borings Maps:

Provide map showing all soil borings and monitoring well locations on one map with related COCs concentrations. The maps provided are not complete.

Provide all groundwater data on a table to include grab groundwater data from the beginning.

SCM:

Prepare a site conceptual model (SCM) which incorporates geological sections, maps showing sources, interpretive horizontal and vertical extent of contaminations, conduits, groundwater flow, receptors, etc. SCM should include geological cross sections with plume delineation vertically and horizontally, diagrams, and tables. Furthermore, your workplan should attempt to further refine/complete the developed SCM.

EDF Submittal:

EDF submittal through Geotracker must be performed per Assembly Bill 2886 Sections 13195 - 13198 California Water Code and Sections 2729 and 2729.1 Title 23, Chapter 16, Article 12. EDF submittal has been required effective January 1, 2001. Owners and/or Operators of USTs or their agents must submit analytical data electronically via the Internet to the Regulating Agencies through "Geotracker", which is available as public domain.

Issues with the existing document:

There are several issues regarding the files at this office:

1. It is not clear whether the workplan dated 12/4/03 has ever been implemented. Please explain.
2. Submit all reports, analytical results from all UST removals at the site
3. Please submit the analysis for the waste oil, since this office could not locate such information in our files. Additionally, there are discrepancies in the report. For instance, some reports indicate no holes found in the waste tank(s); while others clearly indicate such holes existed during the removal process.
4. Please provide UST system information, tests performed etc.

Ozone Sparging proposal:

There are several issues, which must be addressed prior to approval of this technique:

1. Free product in the MW-1: How would you ensure that oxygen sparging would not cause ground water from mounding and further causing spread of the plume? Your plan should include removal of free product prior to ozone sparging application to reduce this likelihood.
2. Where are the buried utilities such as sewer, UST piping, etc., with respect to the ozone sparging system? What are the potential associated risk of VOC vapors and elevated oxygen levels regarding the buried utilities and surrounding building basements if any? For instance there is, in fact, an underground area by the building where trucks are serviced.
3. What is the soil intrinsic permeability?
4. What is soil oxidant demand and how would you ensure that the ozone application is enough to ensure there is still ozone left to treat the impacted soil? And will this technique be able to clean up at a level to

meet the site specific clean up goal? That is to what degree will be effective?

5. Iron and other reduced organic compounds: you need to evaluate the reduced Iron content of the soil, for instance. This is due to the fact that when ferrous Iron is converted to ferric iron when exposed to the chemical oxidant precipitating in the saturated zone reducing soil porosity and thus reducing oxidant availability to the plume.
6. You have not discussed the COC's K_{OC} and its solubility to evaluate the likelihood that chemical oxidation is appropriate at this site. Petroleum contaminants with high solubility and low K_{OC} values are more likely to come in contact with the chemical oxidants thus eliminated by chemical oxidation technique.
7. You may need more frequent monitoring, at least in the beginning to ensure proper operation and to avoid build up of VOCs and oxygen in the underground and utilities and or basements if any.
8. MTBE may not be as effectively treated with this technique.
9. Can this techniques economically treat the site to within acceptable clean up goals?
10. The plume is not properly defined vertically and horizontally. Any oxygen-sparging well must be properly located to reach the impacted areas. Additionally, the area north east of the pump island will not be treated. However, Borings BH-H and BH-G have had noticeable amount of contaminant in soil and or groundwater. This area is right at northeastern portion of the property, indicating plume traveling off-site. Therefore, please provide Sampling and analysis to depths sufficient to define the vertical extent of soil contamination to determine if submerged NAPL is present in the above area and the source areas at your site. Please ensure that all soil samples are to be collected at every five feet, change in lithology, discoloration, or areas where warranted (using Hnu and or other proper equipment) up to the depth of 25 feet. This includes collecting discrete soil samples using direct push technology below groundwater level as well. This step will also help in drawing of geological cross sections of the site. Groundwater sampling must also incorporate a discrete multi-level sampling as well to reflect concentrations at different depths rather than an average concentration derived at a typical monitoring well.

Please address all the above concerns in the workplan indicated below.


TECHNICAL REPORT REQUEST

Please submit the following technical reports to ACEH (Attention: Amir K. Gholami):

April 30, 2005 Work Plan

If you have any questions, please call me at 510-567-6876.

Sincerely,



Amir K. Gholami
Hazardous Materials Specialist

C: A.gholami, D.Drogos
Mr. R. Kitay, ASE, 208 West El Pintado Road, Danville, CA 94526



out 01-26-04

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

RO0000085

January 23, 2004

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

Dear Mr. Saidian:

**Subject: Fuel Leak Case #RO0000085, Oakland Truck Stop, 8255 San Leandro St.,
Oakland, CA 94621**

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the December 4, 2002 document regarding the above referenced site as prepared by Mr. Robert Kitay of Aqua Science Engineers, (ASE). I have also called and discussed with Mr. Kitay of Aqua Science Engineers.

This office requests that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

TECHNICAL COMMENTS

This work plan addresses all the required investigations in my correspondence dated December 31, 2003 including:

Ozone sparging test, further definition of both the horizontal and vertical extent of groundwater contamination, verification that no unknown USTs exist at the site, continued quarterly groundwater monitoring, continued weekly bailing of free-floating product, repair of the cracked concrete in the vicinity of the diesel dispensers, conduit and preferential pathway studies, and drawing of geological cross sections.

This office concurs with the submitted workplan as specified above.

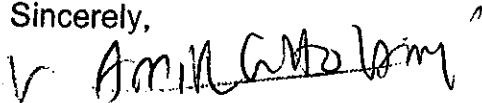
TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

February 23, 2004 Result of the Work Plan

Should you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,



Amir K. Gholami

Hazardous Materials Specialist

C: A.gholami, D.Drogos

Mr. R. Kitay, ASE, 208 West El Pintado Road, Danville, CA 94526



01-07-04

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

RO0000085

December 31, 2003

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

Dear Mr. Saidian:

**Subject: Fuel Leak Case #RO0000085, Oakland Truck Stop, 8255 San Leandro St.,
Oakland, CA 94621**

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the October 23, 2002, January 20, 2003, March 18, 2003, and March 31, 2003 documents regarding the above referenced site as prepared by Aqua Science Engineers, (ASE). This office requests that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

TECHNICAL COMMENTS

- The ASE workplan for an ozone sparging test dated March 18, 2003 has been approved. However, this method must be evaluated for effectiveness and modified or changed as needed.
- Further definition of both the horizontal and vertical extent of groundwater contamination is required. The definition of the vertical extent of contamination will require deeper borings in the vicinity of the USTs and near the southern property line. A workplan will be required to address this concern.
- Documentation must be submitted to this office to verify that no unknown USTs exist at the site. If this has not already been completed, a magnetometer or ground penetrating radar should be used to confirm that no additional sources of contamination exist in the subsurface.
- Quarterly groundwater monitoring must continue at the site until further notice.
- Weekly bailing of free-floating product must continue in monitoring well MW-1 until no measurable free-product can be measured.
- The cracked concrete in the vicinity of the diesel dispensers could be a possible source of the diesel contamination found in monitoring well MW-1. This concrete must be repaired. However, if this concrete is scheduled to be replaced during upgrading work

required by the City of Oakland, you may replace this concrete pad with the new pad within 30 days and/or as approved by this office.

TECHNICAL REPORT REQUEST

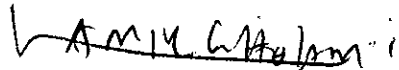
Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

January 23, 2004 Work Plan

January 23, 2003 Documentation for source investigation if performed previously.

If you have any questions, you may contact me at (510) 567-6876.

Sincerely,



Amir K. Gholami
Hazardous Materials Specialist

C: A.gholami, D.Drogos
Mr. R. Kitay, ASE, 208 West El Pintado Road, Danville, CA 94526

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



11-18-02

0085/2897

November 15, 2002

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

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: Soil and Groundwater Assessment, Sensitive Receptor Survey, Tier 1 Risk-Assessment and Corrective Action Plan for Oakland Truck Stop, 8255 San Leandro St., Oakland, CA 94621

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the October 23, 2002 referenced report for the above site as prepared by Aqua Science Engineers, (ASE). The following conclusions are made from this report:

- The extent of the petroleum release in groundwater remains undefined in the north, south and east directions from the site.
- Extraction well MW-9 is significantly impacted with MTBE
- The well survey identified three industrial wells within a 2000' radius from the site. Two of the wells are up-gradient, the other well is approximately 1000' to the northwest.
- The pump test from MW-9 yielded unreliable results due to the nearby tank pit and utilities trench, however, influence in MW8 located 66' from MW-9 was observed.
- The Tier 1 Risk Evaluation identified benzene concentration in MW3, exceeding indoor air impact exposure RBSL. In addition, the presence of free product, elevated TPHd levels (up to 50 ppm) and MTBE concentrations, up to 21 ppm in groundwater will require remediation.
- The Corrective Action Plan proposes in-situ chemical oxidation using ozone injection as the recommended remediation method. Our office believes that this method has a potential to be successful. In order to evaluate this technology, please submit a site-specific work plan for the performance of a pilot study. Please provide technical information on the potential hazards of this technique and it's applicability for use at operating gasoline stations.

Please provide your pilot study work plan to our office January 2, 2003.

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, 208 West El Pintado Road, Danville, CA 94526

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

Pilot8255SanLeandroSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



11-18-02

0085/2897

November 15, 2002

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

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: Soil and Groundwater Assessment, Sensitive Receptor Survey, Tier 1 Risk-Assessment and Corrective Action Plan for Oakland Truck Stop, 8255 San Leandro St., Oakland, CA 94621


Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the October 23, 2002 referenced report for the above site as prepared by Aqua Science Engineers, (ASE). The following conclusions are made from this report:

- The extent of the petroleum release in groundwater remains undefined in the north, south and east directions from the site.
- Extraction well MW-9 is significantly impacted with MTBE
- The well survey identified three industrial wells within a 2000' radius from the site. Two of the wells are up-gradient, the other well is approximately 1000' to the northwest.
- The pump test from MW-9 yielded unreliable results due to the nearby tank pit and utilities trench, however, influence in MW8 located 66' from MW-9 was observed.
- The Tier 1 Risk Evaluation identified benzene concentration in MW3, exceeding indoor air impact exposure RBSL. In addition, the presence of free product, elevated TPHd levels (up to 50 ppm) and MTBE concentrations, up to 21 ppm in groundwater will require remediation.
- The Corrective Action Plan proposes in-situ chemical oxidation using ozone injection as the recommended remediation method. Our office believes that this method has a potential to be successful. In order to evaluate this technology, please submit a site-specific work plan for the performance of a pilot study. Please provide technical information on the potential hazards of this technique and it's applicability for use at operating gasoline stations.

Please provide your pilot study work plan to our office January 2, 2003.

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, 208 West El Pintado Road, Danville, CA 94526

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

Pilot8255SanLeandroSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



02-23-01

2085

February 22, 2001
StID # 559

Mr. Nissan Saidian
5733 Medallion Court
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

**Re: Work Plan for Additional Soil and Groundwater Assessment at 8255 San Leandro St.,
Oakland CA 94621**

Dear Mr. Saidian:

Our office has received and reviewed the February 6, 2001 work plan for the above referenced site prepared by Aqua Science Engineers Inc. (ASE), your consultant. The work plan responds to my July 27, 2000 letter and proposes the following:

- Investigate the extent of the groundwater contamination plume by installing three additional monitoring wells in the southwest direction from the former tanks and advancing one off-site boring northeast of the existing dispenser islands.
- One of the new monitoring wells will be 4" diameter and will be used to perform a step draw-down and constant rate pump test to determine the viability of groundwater extraction.
- After the installation of these wells, all monitoring wells at the site will be sampled and monitored. The additional wells will aid in confirming the groundwater gradient at the site, which has been unusual.
- Should free product be encountered in any well, a sample will be collected, analyzed and characterized. This will help determine if there have been recent releases in addition to older releases.
- A receptor survey will be performed to identify potential impacts from the fuel release.

This work plan is approved with the condition that the final report should also include a Tier 1 Human Health Risk Assessment (HRA). The HRA should also include an evaluation of risk to MTBE.

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. Robert Kitay, Aqua Science Engineers, 208 W. El Pintado, Danville, CA 94526
Wpap8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



sent
7/27/00
(c) 2085 / (c) 002897

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

July 27, 2000
StID # 559

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

Re: Oakland Truck Stop, 8255 San Leandro St., Oakland CA 94621

Dear Mr. Saidian:

Our office has received and reviewed the July 10, 2000 Aqua Science Engineers Inc. (ASE) Additional Soil and Groundwater Assessment and the July 17, 2000 ASE Quarterly Groundwater Monitoring Report for the above referenced site. As you may recall, the July 10th report gives the results of eight (8) soil and grab groundwater samples taken around the southern and eastern property boundaries of this site. ASE concludes from the test results that there appears to have been three separate fuel releases, one near the fuel dispensers, one near the former fuel tanks and a MTBE release from the existing underground tanks. Regardless of the number of releases, it is apparent that the extent of the petroleum groundwater contamination has not been determined, both up and down-gradient of the site.

I have spoken with ASE and their recommendation is to further define the extent of soil and groundwater contamination. Also, prior to installing any additional monitoring wells, they would like to advance temporary borings. Our office approves of this approach. ASE also recommends the placement of a more efficient skimmer in monitoring well, MW-1, which has detected free product ever since its installation. This is approved, however, this is the minimum which should be done.

Our office requests the submission of a work plan to perform this additional site characterization. Your work plan should also contain the following:

- An evaluation of nearby receptors, including buildings, surface water bodies, industrial or municipal wells.
- An assessment as to potential environmental or human health risk given the above evaluation and the current contaminant levels. This will dictate the necessary remedial action and the urgency of implementing remediation.
- A sample of the free product should be analyzed to verify its contents. This may help to clarify whether this is a result of a recent or old release.
- A proposal for the conversion of a number of the additional borings into monitoring wells.

Mr. N. Saidian
8255 San Leandro St.
StID # 559
July 27, 2000
Page 2.

Please submit your work plan to our office within 45 days or no later than September 11, 2000.

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, 208 W. El Pintado, Danville, CA 94526
Wprq8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent
7/27/00
(6) 2085 / (6) 202897

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

July 27, 2000
StID # 559

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

Re: Oakland Truck Stop, 8255 San Leandro St., Oakland CA 94621

Dear Mr. Saidian:

Our office has received and reviewed the July 10, 2000 Aqua Science Engineers Inc. (ASE) Additional Soil and Groundwater Assessment and the July 17, 2000 ASE Quarterly Groundwater Monitoring Report for the above referenced site. As you may recall, the July 10th report gives the results of eight (8) soil and grab groundwater samples taken around the southern and eastern property boundaries of this site. ASE concludes from the test results that there appears to have been three separate fuel releases, one near the fuel dispensers, one near the former fuel tanks and a MTBE release from the existing underground tanks. Regardless of the number of releases, it is apparent that the extent of the petroleum groundwater contamination has not been determined, both up and down-gradient of the site.

I have spoken with ASE and their recommendation is to further define the extent of soil and groundwater contamination. Also, prior to installing any additional monitoring wells, they would like to advance temporary borings. Our office approves of this approach. ASE also recommends the placement of a more efficient skimmer in monitoring well, MW-1, which has detected free product ever since its installation. This is approved, however, this is the minimum which should be done.

Our office requests the submission of a work plan to perform this additional site characterization. Your work plan should also contain the following:

- An evaluation of nearby receptors, including buildings, surface water bodies, industrial or municipal wells.
- An assessment as to potential environmental or human health risk given the above evaluation and the current contaminant levels. This will dictate the necessary remedial action and the urgency of implementing remediation.
- A sample of the free product should be analyzed to verify its contents. This may help to clarify whether this is a result of a recent or old release.
- A proposal for the conversion of a number of the additional borings into monitoring wells.

Mr. N. Saidian
8255 San Leandro St.
StID # 559
July 27, 2000
Page 2.

Please submit your work plan to our office within 45 days or no later than September 11, 2000.

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

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. R. Kitay, ASE, 208 W. El Pintado, Danville, CA 94526
Wprq8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 5-25-2000

202897

May 25, 2000
StID # 559

Mr. Nissan Saidian
5733 Medallion Court
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

**Re: Workplan for Soil and Groundwater Assessment at Oakland Truckstop,
8255 San Leandro St., Oakland CA 94621**

Dear Mr. Saidian:

Our office has received and reviewed the May 23, 2000 workplan referenced above for further soil and groundwater investigation at Oakland Truckstop. Both our office and your consultant agreed that further site characterization was needed prior to installing additional monitoring wells and considering a remediation strategy.

The workplan proposes the advancement of eight temporary borings on the north, east and south property boundaries. Soil and groundwater samples will be collected and analyzed for diesel, gasoline, BTEX and MTBE. Please add the analysis of TPH as motor oil to your testing. Please insure your consultant includes recommendations for future work in their interpretation of the proposed work. This workplan is approved.

Please notify our office prior to initiating this work. You may contact me at (510) 567-6765.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

• C: B. Chan, files

Mr. R. Kitay, Aqua Science Engineers, 208 West El Pintado, Danville, CA 94526

Wpap8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency

*Sent 1/7/00
Including cc's*

202897

January 6, 2000
StID # 559

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

2085 ✓ 0

202897 C

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

Re: Soil and Groundwater Assessment at Oakland Truck Stop, 8255 San Leandro St.,
Oakland CA 94621

Dear Mr. Saidian:

Our office has received and reviewed the December 17, 1999 Report of Additional Soil and Groundwater Assessment and Quarterly Groundwater Sampling for the above site as prepared by Aqua Science Engineers, Inc. (ASE). As you are aware, this report summarizes the results of the installation of two additional monitoring wells, in addition to reporting the sampling of the four (4) previously installed wells. This work was done to characterize the extent of the gasoline and diesel release to soil and groundwater.

The results of the investigation confirm the presence of free product in monitoring well MW-1 and the presence of elevated gasoline, diesel, BTEX and MTBE near the former underground storage tanks. At this time, our office has the following recommendations:

- Please continue to monitor the wells on a quarterly basis, with the same analytes.
- Please initiate a program to remove the free product from MW-1. This may be either an active or passive method, however, please inform our office of your actions.
- The site has not yet been fully characterized, as mentioned in the report's summary. Due to the uncertainty of the extent of contamination, our office recommends further site assessment using temporary borings. This will allow you to estimate the extent of contamination prior to installing permanent wells. It appears that the north, east and south directions of the site still need characterization.

Until the site has been characterized, it would be premature to evaluate the type of remediation necessary or the desired clean-up levels.

Please have your consultant contact me to discuss your work plan for further site characterization. I may be reached 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 West El Pintado, Danville, CA 94526

SSI8255SI.SI

*Sent 11-18-99
Including cc's*

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

PO2897

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

November 17, 1999
StID # 559

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

**Re: Work Plan for Soil and Groundwater Assessment at Oakland Truck Stop,
8255 San Leandro St., Oakland CA 94621**

Dear Mr. Saidian:

Our office has received and reviewed the November 11, 1999 Aqua Science Engineers, Inc. (ASE) work plan for additional soil and groundwater assessment at the above site. This work plan responds to my October 4, 1999 letter and is the result of the findings from recent groundwater sampling and soil investigation. The work plan calls for the installation of two additional monitoring wells to further delineate soil and groundwater contamination in both the north and south portions of the site. These two wells will then be incorporated into the monitoring program with the existing four wells.

The work plan is accepted. Please plan to perform this work by no later than December 1999, so as not to alter the current monitoring schedule. Please contact me prior to this work.

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

Sincerely,

Barney M. Chan

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. R. Kitay, ASE, Inc., 208 West El Pintado Road, Danville, CA 94526
Mwwpap8255

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



202897

October 4, 1999
StID # 559

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

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

Re: Oakland Truck Stop, 8255 San Leandro St., Oakland CA 94621

Dear Mr. Saidian:

Our office has received and reviewed the September 22, 1999 Quarterly Groundwater Monitoring Report for the above site as prepared by Aqua Science Engineers Inc. (ASE). As you are aware, groundwater sampling and analysis was performed on wells MW-2, MW-3 and MW-4. Free product, encountered in MW-1, was bailed on several occasions in an attempt to remove the product. Based upon the sampling results and those of the prior soil and groundwater investigation, ASE has made a number of recommendations. Our office has the following comments to the ASE recommendations:

- ASE recommends the removal of free product from MW-1 every two weeks until no further free product is observed for a one- month period. This is acceptable. You should be aware that the initial free product removals were approved by our office prior to being done.
- Additional subsurface investigation is recommended in the area south of boring B-8. Our office agrees with this in addition to requesting additional investigation north of MW-1 and the dispensers. It appears that two additional monitoring wells would be required.
- ASE recommends and our office approves running only lead in the water sample from MW-4.
- ASE recommends running BTEX and MTBE by EPA Method 8020 as a cost savings measure. Prior to doing this, you must confirm the presence of MTBE in that well exhibiting the highest concentration via EPA Method 8020 ie MW-3.
- ASE recommends and our office concurs continuing quarterly monitoring at this site.

Please provide a work plan for this additional investigation along with your next groundwater monitoring report.

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, 208 W. El Pintado, Danville, CA 94526
Mon8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R086

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

September 23, 1999

Ms. Karen Petryna
Equiva Services, LLC
PO Box 6249
Carson, CA 90749-6249
STID 3566

RE: Former Texaco, 1127 Lincoln Avenue, Alameda, CA 94501

Dear Ms. Petryna:

I have reviewed your Quarterly Monitoring Report-Second Quarter 1999 for the above site that was prepared by the IT Corporation. This office concurs with your consultant the monitoring frequency for MW-4, MW-7, MW-9 MW-10 and MW-11 can be reduced from quarterly to semiannually. As a reminder, any changes to monitoring or sampling frequencies must have written prior approval from this office before it is implemented.

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

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Erin Garner, IT Corporation, 1921 Ringwood Avenue, San Jose, CA 95131-1721
Bob Fehr, IT Corporation, 1921 Ringwood Avenue, San Jose, CA 95131-1721
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



July 21, 1999
StID # 559

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

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

**Re: Preliminary Soil and Groundwater Assessment, Oakland Truck Stop
8255 San Leandro St., Oakland CA 94621**

Dear Mr. Saidian:

Our office has received and reviewed the above referenced July 16, 1999 report by Penn Environmental, your consultant. This report summarizes the soil and groundwater investigation, which occurred at this site in February and March of this year. I would like to comment first on the work, which was done and the reporting of this work, before offering an interpretation of the results.

The following items should be corrected in your future actions on this site:

- Please include a groundwater gradient map along with all monitoring reports
- In Figure 2 Site Plan, the figure indicates that 2- 4000 gallon tanks were removed and 2 - 4000 gallon, 1-10,000, 1-8000 and 1-6000 gallon underground tanks remain. Please correct this if this information is incorrect. I thought that only three underground diesel tanks remain at the site.
- It appears that some of the conditions of the work plan were not performed. I had requested that the soil and grab groundwater samples detecting the highest MTBE concentration be confirmed using EPA Method 8240 or 8260. In addition, according to the Penn Environmental work plan, the borehole locations located near the vicinity of the waste oil tank were to be run for VOCs, oil and grease and the 5 metals (cadmium, chromium, lead, nickel and zinc). If oil and grease is detected in these soil samples, the sample with the highest oil and grease concentration will additionally be analyzed for semi-volatiles and PCBs. In addition, the groundwater samples from MW2 and MW4 were run for only Total Oil and Grease and VOCs, leaving off the analysis for TPHg, TPHd, MTBE, the five metals and semi-volatiles.

Because of the extent of soil and groundwater contamination, you should start a quarterly groundwater monitoring program. Because of the delay experienced in receiving this report, I assume no groundwater monitoring has been done since the well installation and initial sampling. Therefore, please perform a quarterly monitoring event within the next 30 days or by August 20, 1999 and submit a monitoring report within 45 days of the sampling.

To account for the missing items mentioned above, your monitoring should be as follows:
MW-1 and MW-3: Total Petroleum Hydrocarbons as diesel and as gasoline, BTEX and MTBE. MTBE in MW-3 should be confirmed using EPA Method 8260 or 8240.
MW-2 and MW-4: Total Oil and Grease, Total Petroleum Hydrocarbons as diesel and as gasoline, BTEX, MTBE, Semi-volatiles (EPA Method 8270), the soluble metals; cadmium, chromium, lead, nickel and zinc, and volatile organics (EPA Method 8240).

Mr. N. Saidian
8255 San Leandro St.
StID # 559
July 21, 1999
Page 2.

After your next monitoring event, you may want to recommend any reasonable changes to this proposed schedule based upon the monitoring results.

The initial investigation results will require the need to further delineate the extent of soil and/or groundwater contamination. I would, however, like to wait to review your next monitoring event results prior to requesting additional investigation.

Please perform your groundwater monitoring according to the above schedule and submit a monitoring report by October 1, 1999. Please institute quarterly monitoring unless a change is approved by our office.

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. D. Thompson, Penn Environmental, 1261 Travis Blvd., Suite 380, Fairfield CA 94533
Mon8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



202897
ENVIRONMENTAL HEALTH SERVICES

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

June 15, 1999
StID # 559

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

NOTICE OF VIOLATION

**Re: Request for Soil and Groundwater Investigation Report for the Oakland Truck Stop,
8255 San Leandro St., Oakland CA 94621**

Dear Mr. Saidian:

Our office requested previously in my April 5, 1999 letter, that you submit by May 6, 1999, the report documenting the installation of subsurface borings and monitoring wells at the above site. To date, we have received only partial information regarding this investigation which occurred in January 1999. The most recent report from you and your consultant was from soil and groundwater samples from monitoring well MW-4 and from within the waste oil tank pit. As you are aware, the data from the report was used by the County and City of Oakland to approve closure-in-place of the waste oil tank. However, within this report is a map showing the location of eight borings and four monitoring wells. It is assumed that soil and groundwater samples were taken during their installation. Further, groundwater monitoring should continue after the monitoring well installations.

To evaluate whether additional investigation is needed and to provide guidance in future groundwater monitoring requirements, please submit the previously requested investigation report to our office **within 30 days or by July 16, 1999**. The failure to submit the requested reports may result in civil liability and forfeiture of Cleanup Fund eligibility.

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. D. Thompson, Penn Companies, 1261 Travis Blvd., Suite 380, Fairfield CA 94533

NOV8255SLSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#85

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

April 5, 1999
StID # 559

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

Re: Request for Technical Report for Soil and Groundwater Investigation, Oakland Truck Stop, 8255 San Leandro St., Oakland CA 94621

Dear Mr. Saidian:

Our office has been informed that the previously approved work plan for soil and groundwater investigation has occurred at the above site. As you may recall, this work included the installation of up to twelve borings, three of which were to be converted into groundwater monitoring wells. In addition, we have learned that a boring may have been advanced immediately next to an existing 500 gallon waste oil tank, north of the existing building. Apparently, our office was not notified when this work was done as was requested in my January 4, 1999 letter.

Please submit your soil and groundwater investigation report to our office within 30 days or by May 6, 1999. Based upon these results, the County may decide if additional investigation is necessary and whether the waste oil tank is best left closed-in-place or removed.

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. D. Thompson, Penn Companies, 1261 Travis Blvd., Suite 380, Fairfield CA 94533

Reprq8255

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#85

January 4, 1999
StID # 559

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

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

**Re: Work Plan, Preliminary Soil and Groundwater Investigation, Oakland Truck Stop,
8255 San Leandro St., Oakland CA 94621**

Dear Mr. Saidian:

Our office has received and reviewed the December 16, 1998 work plan referenced above as provided by your new consultant, Penn Environmental. It appears that the work plan is nearly identical to that previously prepared by W. A. Craig, your prior contractor/consultant. I have listed the following items for correction, some of which were previously noted in either my August 14 or August 19, 1998 letter:

- The Penn Environmental work plan states that Penn removed the underground tanks. Obviously this is incorrect, since W. A. Craig supervised their removal. Similarly, Penn Environmental did not, as stated, issue a June 16, 1998 Final Closure Report, W. A. Craig did.
- Holes were observed in the waste oil tank contrary to that stated in both Penn and W. A. Craig reports.
- Groundwater was observed in both tank pits and the groundwater sample, PW, was from the gasoline tank pit not the waste oil tank pit.
- As stated in my August 19th letter, the soil samples SW-W-4'6" et al were collected from the side walls of the gasoline tank pit, not the waste oil tank pit.

The work plan is acceptable with the following conditions:

- The soil and grab groundwater samples exhibiting the highest MTBE concentration using EPA Method 8020 should be confirmed using EPA Method 8240 or 8260. The water sample from the well nearest the waste oil tank should also have any MTBE detected confirmed using either of these two methods.
- The work plan proposes to analyze two soil samples above or at the capillary fringe and one below. Please make your sampling decisions based upon actual field conditions. If groundwater is encountered at a shallow depth (<10'), it may be appropriate to collect only one sample above groundwater and one below.
- Please provide our office with copies of receipts for the disposal of all soil and groundwater.
- Please contact our office 72 working hours prior to your field work.

Mr. Nissan Saidian
StID # 559
8255 San Leandro St., Oakland CA 94621
January 4, 1999
Page 2.

In regards to the requested information on the prior underground tank investigation at this site, you are advised to make a request to review this file when you may copy any items requested by the Cleanup Fund.

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. D. Thompson, Penn Companies, 1261 Travis Blvd., Suite 380, Fairfield CA 94533
Wpap8255

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#85

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

August 19, 1998
StID # 559

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

Re: Underground Storage Tank and Subsurface Investigation Reports for 8255 San Leandro St. , Oakland, CA 94621

Dear Mr. Saidian:

I have received comments from W. A. Craig responding to my August 14, 1998 letter. In regards to the underground storage tank removals, the following items were clarified:

- The waste oil tank indeed had observed holes in it.
- Soil sample 1PB-C-9.5 was taken from beneath the center of the waste oil tank, although it is not certain why it was taken at such a deep depth.
- Groundwater or water was observed in both pits. Very little water was found in the waste oil tank pit, while a significant amount was found in the gasoline pit. This is where the sample, PW, was taken and the source of the pumped out tank water.
- The waste oil parameters; total oil and grease, halogenated volatile organics and semi-volatile organics were erroneously not run on the waste oil soil sample(s).
- The tank water has been properly disposed, while the stockpiled soils are pending imminent disposal, possibly this week.
- No piping adjacent to the gasoline tanks was encountered. It was likely removed by a prior contractor. The piping run from the waste oil tank to the remote fill port was short and no sample taken.

One question remains regarding the locations of soil samples; SW-W-4'6", SW-S-5'3" and SW-N-6". It is thought that these samples may actually have been collected from the sidewalls of the gasoline tank pit, not the waste oil tank pit. This must be clarified in the future.

In regards to my comments to the work plan, all of my conditions will be met and our office agrees in allowing the on-site geologist discretion to collect moist soil samples if deemed valuable in determining the vertical extent of contamination. This assumes these samples are not the result of groundwater contamination.

Your consultant estimates that pre-approval from the Clean-up Fund, bidding and selection of a consultant will take approximately eight (8) weeks. Therefore, **this work plan should be initiated within two months or by October 20, 1998.** Please contact this office **72 working hours prior to your field work.**

I have spoke with Ms. Cheryl Gordon of the Clean-up Fund and confirmed the site was "in compliance" based on the performance of the proposed work plan.

Mr. Nissan Saidian
SiID # 559
8255 San Leandro St.
August 19, 1998
Page 2.

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. L. Yialelis and G. Fiedler, WACraig, Inc., 6940 Tremont Rd., Dixon, CA 95620-9603
Ms. C. Gordon, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Stat8255

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#85

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

August 14, 1998
StID # 559

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

**Re: Underground Storage Tank Removals and Site Investigation at 8255 San Leandro St.,
Oakland CA 94621**

Dear Mr. Saidian:

This letter comments on the recently submitted **June 16, 1998 Final Closure Report for Underground Storage Tank Removal** and the **August 3, 1998 Work Plan- Preliminary Soil and Groundwater Quality Investigation** for the above referenced site. These reports, from W. A. Craig, describe and respond to the March 8, 1998 removal of three underground tanks; one 500 gallon waste oil tank and two 4,000 gallon gasoline tanks. As you are aware, three diesel tanks remain at the site lying just northeast of the former gasoline tanks. Please be informed that the tank closure report was only recently faxed to our office on 8/13/98, the same day you dropped off to me another copy of the report. Please be advised, the report should have been submitted much earlier to the City of Oakland, Fire Department, Office of Emergency Services to the attention of Mr. Hernan Gomez. Once the fuel release has been confirmed, the records and file are transferred to Alameda County Environmental Health for oversight through the Local Oversight Program (LOP).

Upon review of the submitted reports, I noticed inconsistencies which generated questions which need to be addressed. Please have your consultant respond to the following items:

1. The August 3 work plan states that no holes were observed in the USTs removed by WAC while the inspection report of Mr. Hernan Gomez states that the waste oil tank has some holes.
2. In Mr. Gomez's inspection report, it states that one soil sample, 1PB-C-9.5, was taken from the middle of the (waste oil) tank, however, in the WAC site plan map, PB-C-9.5 is shown to be located in the center of the former gasoline pit.
3. The August 3 work plan states that "Groundwater was not observed during excavation of the gasoline UST area", however, in the closure report sample PW is identified as "water sample from gasoline pit". In addition, Mr. Gomez's inspection report states that the diesel (gasoline) "pit observed w/H₂O". It is most likely that groundwater was encountered in the gasoline tank since it was excavated to a deeper depth than the waste oil tank, however, the work plan states that "groundwater was encountered at an approximate depth of 5.5 fbg in the waste oil tank".
4. Why wasn't total oil and grease, halogenated volatile organics or semi-volatile organics run on any of the waste oil tank pit samples as recommended by the Tri-Regional Board Guidelines? Interestingly, the waste oil stockpile samples were analyzed for oil and grease while the sidewall samples were not.

Mr. Nissan Saidian
StID # 559
8255 San Leandro St.
August 14, 1998
Page 2.

5. As I have mentioned previously to WAC, the work plan stated that "the UST backfill materials were completely removed from each UST location, profiled and hauled to a Class II landfill for disposal". I later found out that the excavated stockpile soils have not yet been disposed. In addition, I have learned that the holding tank of pit water has been removed and disposed of properly.
6. There is some confusion regarding the piping run from the tank pits. The work plan states that the "waste oil UST was remotely filled from the shop area..." How was this piping run closed and why wasn't a soil sample taken either along the run or beneath the fill port? In addition, the work plan states, I believe in error, that "gasoline from the former UST was also dispensed at a location inside the shop area". Please verify where the piping ran from the former gasoline tanks and justify why no piping samples were taken.
7. In regards to the disposal of soil and groundwater from this site, please provide copies of the disposal receipts or give our office a schedule for the removal of this material.

My next comments deal with the work plan submitted for site characterization.

As an initial step in site characterization, the work plan proposes to advance a minimum of 12 exploratory borings, sample both soil and groundwater and convert three of the borings into 2 inch monitoring wells.

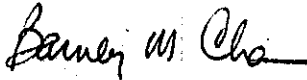
- Please explain why one soil sample is to be collected below the first encountered groundwater. This soil sample would not be representative of soil conditions, rather it would be the result of groundwater contamination.
- All soil and groundwater samples are to be analyzed for diesel, gasoline, BTEX and MTBE using EPA Method 8020. Because of the anticipated impact to groundwater, please verify the highest MTBE samples in soil and groundwater using EPA Method 8240 or 8260 in accordance with Water Board guidance. At least one monitoring well sample should also confirm MTBE presence using EPA Method 8240 or 8260.
- The soil and groundwater samples located near the waste oil tank area will be analyzed for TPH as oil and grease and volatile organics using EPA Method 8240. Instead of using EPA Method 413.1 for oil and grease please use a silica gel cleanup and quantify using TPHmo using modified 8015.
- The screen interval for the wells was not stated. Please insure that the slot width is between 0.01-0.02".
- The soil sample from the borehole with the highest TPHmo should also be run for semi-volatiles and PCBs. Please also run the groundwater sample from this borehole for these parameters. In addition, the monitoring well nearest the former waste oil tank should be analyzed at least once for the entire waste oil suite: TPHg, TPHd, BTEX, MTBE, semi-volatiles, PCBs, volatile organics and the metals; cadmium, chromium, lead, nickel and zinc.

Mr. Nissan Saidian
StID # 559
8255 San Leandro St.
August 14, 1998
Page 3.

Because our office may be asked to comment on the "compliance" of this site for the Cleanup Fund eligibility, please insure that an acceptable reply to the above concerns is submitted in writing as soon as possible. Your reply should also provide a schedule for the starting of the proposed work plan.

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. J. Fielder, W. A. Craig, Inc., 6940 Tremont Rd., Dixon, CA 95620-9603

Mr. H. Gomez, City of Oakland, Fire Dept., OES, 505 14th St., 7th Floor, Oakland 94612

Ms. C. Gordon, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

1Wp8255

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#85

July 8, 1998

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

Mr. Leroy Griffin,
Supervisor
City of Oakland Fire Department
Emergency Services
505 14th Street
Oakland, CA 94601

RE: Transfer of Underground Storage Tank (UST) Projects

Dear Leroy:

As we discussed earlier, with my recent transfer from the CUPA program to Environmental Health's Household Hazardous Waste Program (HHW), the UST projects previously under my supervision need to be re-assigned. The sites in my caseload located within our CUPA area were assigned to Rob Weston. The remaining sites, in your jurisdiction, I am forwarding to you unless otherwise noted.

Following is a case summary of sites with tanks with regard to certification readiness:

2951 High Street, Zima Corporation (RO# 261)

Mr. Mo Mashoon, RP, has been contacted several times to provide this office with the documentation needed to re-permit and certify the station. At this time the following requirements remain unsatisfied:

- An annual test capable of detecting a release equivalent to .1 gph defined at 150% of normal operating pressure.
- The leak monitor must be reconfigured to allow .2 gph leak detection and the USTs must be filled to over 90% capacity when tested on a monthly basis. The hard copy of test data must include the calculated leak rate and leak threshold.

8255 San Leandro Street, SF-Oakland Truck Stop (RO# 85)

Hernon and I witnessed the lining of two UST at this site. In addition to lining work, other upgrade work to different tanks was also in process. This office had approved of the lining upgrade. The other work was not included in their submittal and was not approved. The contractor on record, Semco, and Nissan Saiden, the RP, were contacted several times regarding the status of this station without response.

Issues not yet resolved include but may not be limited to the following:

- The certified engineer's report on the lining job has yet to be submitted: both suitability of the UST to line and the adequacy of the lining work conducted.

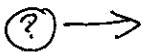
- An accurate workplan has yet to be submitted. The work encountered at the site was not fully covered by the current workplan.
- Accurate and up to date Forms A, B, C, 1995 version have yet to be submitted.
- Accurate and up to date monitoring, spill response plans (s) have yet to be submitted.
- System tightness tests that were conducted post modification have yet to be reported.
- Other issues such as Financial Responsibility, plot plans etc. also remain unaddressed.

1395 7th Street, Trucker's Friend (RO# 53)

The facility removed and installed UST. Two tanks, one being compartmentalized, were installed. The systems were checked and passed. Paperwork, though, has yet to be finalized. To date the following still has not been submitted

- State Form A, B, C on the 1995 form
- Precision test results
- It is assumed that "Option 3" for double wall pipe is used. The equipment in place is compatible with the requirements if this is the approach in use.

In addition to the above sites, the following is an update on a site that has not been closed or formally transferred to the LOP:



Bay Bridge Paint Booth

The soils report has yet to be submitted. After talking to CalTrans and their consultants, the report will be sent to this office tomorrow. Based on our conversation it appears that the site will be LOP eligible. As such, this case will be handed over to Larry Seto to complete.

Please let me know if I can provide any assistance to you and your staff as these cases are dealt with. Paperwork relevant to these sites, or for that matter other sites in Oakland, sent to me will be forwarded to you.

Sincerely,

Ariu Levi

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R085

June 3, 1998
StID # 559

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

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

Re: Underground Tank Removal and Subsurface Investigation at 8255
San Leandro St., Oakland CA 94621

Dear Mr. Saidian:

Our office has received copies of the analytical results for soil and groundwater samples taken after the recent tank removals at the above site. I have also spoke with Mr. Hernan Gomez of the City of Oakland and Mr. Dave Croshere of W. A. Craig, Inc. At this time, given the significant petroleum contamination found in both soil and groundwater, the oversight of this investigation and remediation has been transferred to the Alameda County Environmental Health Local Oversight Program (LOP) and I will be the contact.

Please have a copy of your underground tank closure report sent to both of our offices as soon as available.

I have been requested by your consultant to review all the analytical results and request or recommend any additional further necessary work. After my review of current information, I have the following observations and recommendations:

- Based on the results on the samples taken from the stockpiled soils, you will need to either remediate or properly dispose of them to an appropriate landfill. The soils should not be reused as backfill without remediation and resampling.
- Significant residual soil contamination was found in the shallow and deep samples from the fuel tank pit and in the grab groundwater sample. These results indicate a release of both gasoline and diesel has occurred. The presence of MTBE (methyl tertiary-butyl ether) in groundwater is from a gasoline release.
- The soil sample taken from the former waste oil pit was not run for the following analytes; oil and grease, chlorinated solvents and semi-volatiles, which are typically run on waste oil samples. Was groundwater encountered during the removal of the waste oil tank? It is interesting that groundwater is currently at a depth of about 5' in the fuel tank pit.

Mr. Nissan Saidian
8255 San Leandro St.
StID # 559
June 3, 1998
Page 2.

- At this time, further excavation of the tank pits is not recommended as it would not be cost effective. However, our office does recommend the removal of additional groundwater from the fuel tank pit. This would be an effective way to remove some of the petroleum source.

As you are aware, our office previously requested that you submit a work plan for soil and groundwater investigation based upon soil sample results taken by SEMCO in October 1997. I again requested for this work plan in my March 4, 1998 letter. Ms. Cheryl Gordon of the UST Cleanup Fund has reviewed your file and in her May 22, 1998 letter, you were requested to contact our office to ensure your eligibility to the Cleanup Fund. You are required to obtain compliance sign-off within 90 days (ie by August 22, 1998) or risk removal of your reimbursement claim. In order for our office to confirm compliance, you must submit your work plan and initiate it prior to this date. To do this, our office requests you submit your work plan for soil and groundwater investigation within 30 days or by July 6, 1998. Your work plan should also respond to the previously mentioned items.

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. H. Gomez, City of Oakland, Fire Department, OES, 505 14th
St., 7th Floor, Oakland, CA 94612

Mr. D. Croshere, W. A. Craig Inc., P.O. Box 448, Napa, CA
94559-0448

Ms. C. Gordon, SWRCB, P.O. Box 944212, Sacramento, CA 94244-
2120

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#85

March 4, 1998
StID # 559

Mr. Nissan Saidian
5733 Medallion Ct.
Castro Valley, CA 94552

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

NOTICE OF VIOLATION

Re: S.F. Auto Truck Plaza, 8255 San Leandro St., Oakland CA 94621

Dear Mr. Saidian:

After reviewing a faxed copy of analytical results for soil samples taken during underground tank lining activities, I requested a hard copy of the analytical results and a report indicating the locations of these samples in my October 29, 1997 letter. In addition, I requested that you submit a work plan for the determination of the extent of petroleum contamination in soil and groundwater. The hard copy of the analytical data was to be submitted by November 14, 1997 and your work plan for subsurface investigation was to be submitted by November 28, 1997. To date, our office has not received either of these reports.

Today I was notified by Mr. Leland Yialelias of W. A. Craig, that he had been contracted by you to remove two underground tanks and perform a subsurface investigation. He requested that our office grant an extension for the work plan until the underground tanks had been removed. This letter grants an extension for the submittal of your work plan to **April 6, 1998**. However, please submit a hard copy of soil sample results **within 10 days or by March 19, 1998**.

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. L. Yialelias, W. A. Craig, Inc., P.O. Box 448, Napa, CA
94559-0448

nov8255

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO#85

October 29, 1997
StID # 559

Mr. Nissan Saidian
5733 Medalion Ct.
Castro Valley, CA 94552

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

Re: S.F. Auto Truck Plaza, 8255 San Leandro St., Oakland 94621

Dear Mr. Saidian:

Our office has received and reviewed a faxed copy of analytical results for soil samples taken during the underground tank lining activities at the above site. These samples, taken on October 7, 1997, were provided to our office by Mr. Deno Milano of HK2, Inc./ SEMCO. Please provide our office a hard copy of this report **within 15 days or by November 14, 1997**. This report should include a site map indicating the location of these samples, analytical data and a narrative of how the samples were taken and a rationale for their locations.

The analytical results indicate that shallow soil at the site has been impacted by Total Petroleum Hydrocarbons as diesel (TPHd) and BTEX (benzene, toluene, ethylbenzene, xylenes). Most likely, the soil is also impacted with Total Petroleum Hydrocarbons as gasoline (TPHg) because of the presence of BTEX. Future analytical testing should include analysis for TPHg and MTBE (methyl tertiary butyl ether).

Based on the analytical results and the potential of this release to impact groundwater this site has been transferred to the Local Oversight Program (LOP), within Alameda County Environmental Health, Hazardous Materials Division. Our office has been delegated by the Regional Water Quality Control Board (RWQCB), to be the local agency which will oversee such releases to soil and/or groundwater. A Notice of Responsibility (NOR) letter has been sent to your attention informing you of this administrative action.

It appears that this site may be a low risk soil or groundwater case as defined by the RWQCB, however, the site must be adequately characterized prior to determining this. Therefore, our office requests a work plan to determine the limits of petroleum release to soil and groundwater. One acceptable approach would be to advance temporary borings around the underground tanks, pipings and/or dispensers and sample both soil and groundwater. You should discuss other options with your consultant.

Mr. Nissian Saidian
StID # 559
8255 San Leandro St.
October 29, 1997
Page 2.

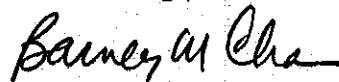
Please submit your work plan for subsurface investigation within
30 days or by November 28, 1997.

Enclosed, please find an Unauthorized Release (Leak) Report
(ULR). Please fill out this form and return to our office within
10 days of receipt.

This is a formal request for technical reports pursuant to both
the Water Code and the California Health and Safety Code.
Failure to submit the requested reports may subject you to civil
liability.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosure

c: B. Chan, files
A. Gholami, ACEH

wp8255

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#85

February 26, 1997
StID # 559

Mr. Nissan Saidian
301 Franklin St.
Oakland CA 94607

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

Re: Limited Soil Sampling at 8255 San Leandro St., Oakland 94621

Dear Mr. Saidian:

I have received and reviewed the November 20, 1996 Limited Soil Sampling report for the above site as prepared and provided by W.A. Craig, Inc. The report gives analytical results of a soil sample taken at depth of 2 feet in the general area of the fuel tanks located at the above address.

Upon review of the analytical results, there is insufficient data to determine if a significant release of petroleum has occurred at this site. Significant meaning that which would require additional investigation. Our office recommends, at a minimum, one boring be advanced to groundwater, in the same general location as boring EB-3 and soil and grab groundwater samples be taken for chemical analysis. These samples should be analyzed for Total Petroleum Hydrocarbons as diesel (TPHD), as gasoline (TPHg), BTEX and MTBE. Should you suspect additional areas of potential releases, you may choose to advance additional borings similarly to groundwater or to a depth where no chemicals are detected.

The oversight of this site is being reviewed through our deposit/refund mechanism. Time spent overseeing this project will be debited against a deposit and any monies remaining after completion of our review will be refunded to the depositor. If further investigation indicates a potential threat to groundwater or human health has occurred from a release from the underground fuel tanks, this site will be transferred to the Local Oversight Program (LOP). Therefore, please submit a deposit in the amount of \$500.00, payable to Alameda County Environmental Health, noting the address of your site on the check. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: W. A. Craig, W.A. Craig, Inc., P.O. Box 448, Napa CA 94559-0448

B. Chan, files dep8255