

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



02-1501

20104

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

February 14, 2001
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

Re: Closure of Monitoring Wells at 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

Our office has received concurrence from the Regional Water Quality Control Board on our recommendation for site closure of the above referenced location. Prior to issuing the closure letter, our office requests the proper closure of the five (5) existing monitoring and two (2) existing extraction wells installed at this site.

You may contact Alameda County Public Works Water Resources Section at (510) 670-5554 for specific requirements of well closure.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. D. Tom, Basics Environmental, 116 Glorietta Blvd., Orinda, CA 94563
W1clrq1234- 40th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 5-17-2005
incl cc's

20104

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

May 16, 2000
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

Re: Documentation of Disposal of Soils for Motor Partners, 1234 40th Ave., Oakland 94601

Dear Mr. Owens:

Our office is reviewing the above referenced site for recommendation of site closure to the Water Board. During our review, it appears that soil generated from the over-excavation of the two former underground tanks does not have proper documentation of disposal.

Please provide such documentation of disposal as soon as possible to expedite site closure.

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. G. Rogers, Aquatic & Environmental Applications, 38053 Davy Ct., Fremont, CA 94536

Spolls1234 40th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT, incld cals
3-10-2000

20104

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

March 10, 2000
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

Re: Motor Partners Site, 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

As you are aware, our office is currently reviewing the January 28, 2000 Risk Assessment Addendum prepared by Mr. Gary Rogers and evaluating this site for closure recommendation. Upon review of the site history, it appears that we are missing some technical reports. In addition, we have made additional observations, which will require your response.

Please provide a copy of the following reports:

- CEC, 1994a The report detailing the excavation of the former underground tank pits, the sampling results and documentation of soil disposal.
- CEC, 1994a The report detailing the advancement of the additional borings drilled in November 1995 and February 1996.
- RES, 1996c The aquifer pump test.

In addition, our office would like verification that groundwater concentrations in the former tank area and inside the building are truly representative. To verify this, our office requests that the ORC socks be removed from the wells. The wells should be allowed to equilibrate and prior to sampling, the wells should be over-purged of a minimum of ten well volumes. In addition, please sample groundwater from the extraction casings to determine if residual contamination exists and whether it poses an on-going source.

To expedite closure, please provide the aforementioned reports and perform the additional sampling.

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. G. Rogers, 38053 Davy Ct., Fremont, CA 94536

Reps1234 40th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 1/5/00
Including cc's

h0104

January 3, 2000
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

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

Re: Tier 2 Risk Assessment for Motor Partners, 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

Our office has received and reviewed the December 15, 1999 Tier 2 Risk Assessment for the above site as prepared by Mr. Gary Rogers of Aquatic & Environmental Applications. I have also spoken with Mr. Rogers regarding our offices' concerns.

Please provide the following information affecting the risk assessment so we can continue our evaluation:

- The sampling procedure for the past four sampling events should be described. Of concern is the presence of oxygen releasing socks. Groundwater samples should be purged after the removal of the socks prior to sampling.
- The groundwater concentration used for the risk assessment will be the average concentration of the past four monitoring events for wells MW1 and MW5. This value will be used to regenerate your site specific target levels (SSTL).
- The soil concentration used for the risk assessment will include all vadose soil samples from monitoring wells MW-1, MW-5 and borings B-5 and B-6. Please include a copy of the soil SSTL values. This was missing in the previous report.
- Groundwater ingestion is not considered a complete pathway at this site, therefore, it should not be evaluated.
- Please insure that the California slope factor of 0.1 for benzene is used in your assessment.
- Your addendum should also include and incorporate the results of the recent December 1999 sampling event.
- Please include the input parameter summary table indicating the default and site specific parameters used in your risk assessment.

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. G. Rogers, Aquatic & Environmental Applications, 38053 Davy Ct., Fremont, CA 94536

T2RBCA1234 40th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 104

April 7, 1999
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

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

Re: Groundwater Monitoring at 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

Our office has reviewed the 1st quarter 1999 groundwater monitoring report for the above site as prepared by Mr. Gary Rogers of Aquatic and Environmental Applications. One item which I would like to comment on is the apparent decrease in petroleum hydrocarbon concentrations found in those monitoring wells where the oxygen releasing compound (ORC) has been added ie MWs 1,3 and 5. I believe that because the groundwater samples are not being purged prior to sampling, you are sampling relatively stagnant water, which has an elevated dissolved oxygen and bio-degradation activity. These concentrations may well not be representative of the entire plume. It was originally thought that the normal purging would remove the dissolved oxygen and thus the bio-remediation activity in groundwater. However, because the ORC socks are designed to release oxygen in a timed fashion, purging the wells will not do any irreparable damage. In the future, our office recommends either sampling after normal purging or sampling prior and after purging.

When groundwater concentrations have reached a steady state or diminished levels, you will need to verify that the entire plume has been treated. This must be done by monitoring the wells without the presence of the ORC socks or after the removal of the socks and normal purging. The effectiveness of the ORC socks may be limited to a small area around the treated monitoring well. I would recommend that additional ORC be added into the extraction wells within the former underground tank pits. This would increase the amount of oxygen added and the treated area. Alternatively, you may want to determine the amount of ORC needed to treat the plume using the software spreadsheet from the ORC supplier. There are at least two options to consider; whether to treat the entire petroleum mass or treat sources to prevent migration. Either method involves the injection of ORC slurry into borings.

Please have your consultant contact me to discuss your comments and actions to this letter. 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. G. Rogers, 38053 Davy Ct., Fremont CA 94536

Mr. T. Conners Esq, 444 DeHaro St., Suite 121, San Francisco, CA 94107

2orc1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 104

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

August 11, 1998
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

Re: Enhanced On-Site Bioremediation at 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

This letter serves to clarify the requirements of your prior proposal to enhance on-site bioremediation. This was included in Mr. Gary Rogers' February 16, 1998 report and mentioned again in the recent July 10, 1998 report. The July 1998 report continues to indicate a lack of dissolved oxygen and reducing conditions in groundwater near the former underground tanks.

Instead of just proposing to introduce oxygen releasing compound (ORC) socks into monitoring wells MW-1, MW-3 and the extraction wells, please have your consultant use the software program to determine the amount of oxygen (or respective ORC) necessary to treat the expected residual total petroleum hydrocarbon (TPH) at this site. The effectiveness of ORC addition is limited when using the ORC socks and you will need to verify that the addition of socks to the existing wells will provide enough oxygen to treat the residual TPH. Please have this investigation done prior to adding any ORC at the site. You are advised that this same approach is being done at the New Genico site across the street.

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. G. Rogers, 38053 Davy Ct., Fremont, CA 94536

Mr. Tommy Conners, Esq., 444 De Haro St., Suite 121, San Francisco, CA 94107

ORC1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 104

April 24, 1998
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

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 for Enhanced Bio-Remediation at Motor Partners,
1234 40th Ave., Oakland CA 94601.**

Dear Mr. Owens:

Our office has received and reviewed the March 31, 1998 Well Installation and Quarterly Monitoring Report for the above site prepared by Mr. Gary Rogers. As you are aware, monitoring well MW-5 was installed downgradient of the former underground fuel tanks, just within the property boundary. The results of soil and groundwater sampling indicate significant diesel fuel contamination in soil and elevated diesel, gasoline and other gasoline constituents in groundwater. The significance of these facts is that the soil and groundwater plume has likely migrated beyond the property boundaries and is impacting off-site residential properties. The results of the previously submitted human health risk assessment indicates potential unacceptable risk.

In light of these results, our office requests immediate implementation of your enhanced bio-remediation work plan. You should include the addition of ORC compound to both extraction wells in addition to wells MW-1 and MW-3. It is unclear whether the effect of this addition will be enough to treat the entire plume, therefore, our office requests that you contact the supplier of your ORC and determine if additional boreholes are needed for ORC introduction.

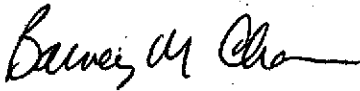
In my March 5, 1998 letter, I also requested that nutrients be added, as necessary, and also include in your quarterly monitoring the analysis of these additional parameters, carbon dioxide, methane and hydrocarbon degraders count. It is necessary to track the effectiveness of this process and adjust it when necessary. Our office agrees that elevated MTBE concentration detected by Method 8020 should be verified by Method 8260.

Please implement this work and report your results in your next quarterly monitoring report.

Mr. Bill Owens
StID # 3682
1234 40th Ave.
April 24, 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. G. Rogers, 38053 Davy Ct., Fremont, CA 94536

Mr. W. Theyskens, Groundworks Environmental, Inc., 1900 Lafayette
St., Suite 209, Santa Clara, CA 95050-3946

Mr. Tommy Conner, Esq., 444 Haro St., Suite 121, S.F., CA 94107

2bio-1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro#104

March 5, 1998
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

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 for Enhanced Bio-Remediation at Motor Partners,
1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and reviewed the February 16, 1998 report from Mr. Gary Rogers. Included in the most recent quarterly groundwater monitoring event was the analysis of a number of indicator parameters of natural biodegradation. The parameter following parameters were tested: dissolved oxygen, oxidation-reduction (redox) potential, ferrous iron, ammonia, nitrate, sulfate and total phosphorous.

~~A~~aerobic (in the presence of oxygen) degradation is the most efficient type of natural biodegradation. The dissolved oxygen (DO) values indicate levels which are adequate for aerobic degradation, however, higher levels of dissolved oxygen are possible in an oxygen saturated condition. The positive redox potential indicates an oxidizing condition conducive to aerobic degradation, however, like the DO value, the redox potential could be higher.

Ferrous iron can be indicative of a reducing condition where initial ferric iron has been reduced to ferrous iron. The low levels of ammonia, nitrate and total phosphorous may be a limiting factor to the bacteria population.

Our office concurs with the addition of ORC (oxygen releasing compound) to the existing wells and extraction well. We also request that the nutrients ammonia, nitrate and phosphorous be added. Please include, additionally, carbon dioxide, methane and hydrocarbon degraders count on your next monitoring event.

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. G. Rogers, 38053 Davy Ct., Fremont, CA 94536
bio-1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#104

January 29, 1998
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

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 for Installation of Monitoring Well MW-5 at
1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and reviewed the January 26, 1998 **Work Plan for Additional Investigation** for the above site provided by Mr. Gary Rogers, your consultant. This work plan responds to the request made in my December 30, 1997 letter. It proposes the installation of a 2" well within the property boundaries of the former Motor Partners site. At least one soil sample will be collected for chemical analysis in addition to the incorporation of this well into the existing quarterly groundwater monitoring schedule for the site. Please proceed with this work as soon as possible.

Our office also awaits the results of the analyses of groundwater samples for the various bioremediation indicating parameters. It is likely that some type(s) of chemical supplements will be necessary to enhance current conditions to stimulate additional bioremediation.

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. G. Rogers, Aquatic & Environmental Applications, 38053
Davy Ct., Fremont, CA 94536

mw5-1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#104

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

December 30, 1997
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

**Re: Additional Site Investigation at Motor Partners, 1234 40th
Ave., Oakland CA 94601**

Dear Mr. Owens:

As you are aware, I have conditionally approved the work plan to install an additional boring (B-19) at the above referenced site as depicted in Mr. Gary Rogers report (9/13/97). Since this time, I have been informed of your neighbor's reluctance to allow access to their property to perform this work. Mr. Rogers has recommended that a boring within the present property boundary be advanced instead of the offsite boring. This boring would be fairly close to that proposed and could likely be scheduled without delay. I agree with his suggestion. In addition, Mr. Rogers was considering installing a one inch boring to be converted into a monitoring well as opposed to the conventional size boring. Not only would this be cost effective but it would mirror what has been done on the Hausauer property at 3927 E. 14th St. Our office approves of this proposal as long as the concerns of Alameda County Public Works is satisfied.

Although it is assumed that groundwater concentrations will not vary going from a two inch to a one inch well, there is logic in determining the extent of groundwater contamination using the same diameter monitoring wells as the adjacent site. Please be aware, however, the proposed "boring" should be a converted into a permanent monitoring well.

A separate report will be submitted to give the results of chemical analysis for bioremediation parameters. Included in this report will be recommendation for the addition of any supplements to enhance bioremediation. Therefore, it is anticipated that the existing monitoring and extraction wells will be used for the addition of these supplements. An additional monitoring well is thus necessary to measure the effects of the addition of the chemical supplements.

Please confirm your future work at this site by submitting a modified site map depicting the new monitoring well location.

Mr. Bill Owens
1234 40th Ave.
StID # 3682
December 30, 1997
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, file
Mr. G. Rogers, 38053 Davy Ct., Fremont, CA 94536
well1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#104

September 25, 1997
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

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 for Additional Site Investigation at Motor
Partners, 1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and reviewed the September 13, 1997 report for additional investigation at the above referenced site as prepared by Mr. Gary Rogers, PH.D., Environmental Consultant. The work plan proposes to determine the extent of the groundwater contaminant plume from the two former underground fuel tanks at this site. A boring, B-19, is proposed to be advanced downgradient of MW-1. Both soil and groundwater samples will be taken for either field screening and/or chemical analysis. One soil and one groundwater sample will be submitted for chemical analysis for the parameters; TPHg, TPHd and BTEX. Please add MTBE your chemical analysis.

A one inch monitoring well is proposed to be set within this boring if contamination is encountered. Please keep in mind the following:

* if the contamination is significant, you will be required to investigate further downgradient to determine the extent of contamination. If you want to use this well for the introduction of chemicals to enhance natural bioremediation a larger diameter well would be better.

* keep in mind, contamination in MW-3 may be disputed to have originated from either yours or Mr. Hausauer's site. If concentrations do not attenuate in this well, an additional downgradient may be required.

Upon review of the Third Quarter 1997 monitoring report, it is apparent that the site currently would fail a Tier 1 risk assessment. Because of this, if active remediation is not recommended, you should determine if natural bioremediation conditions exist. Therefore, please analyze monitoring well groundwater samples for the analytes: dissolved oxygen, oxidation-reduction potential, nitrate, sulfate, ferrous iron, phosphate and ammonia. Based upon these results, you should recommend the addition of supplements necessary to optimize natural bioremediation.

Mr. Bill Owens
StID # 3682
1234 40th Ave.
September 25, 1997
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. G. Rogers, 38053 Davy Ct., Fremont, CA 94536

wpap1234

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 468 (3927 E. 14th St)

✓ RO# 104 (1234 40th Ave.)

August 14, 1997
StID # 4610

Mr. Ruben Hausauer
6017 E. 14th St.
Oakland CA 94601

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

Re: Subsurface Investigation at 3927 E. 14th St. and 1234 40th Ave., Oakland CA 94601, New Genico & Motor Partners Sites

Dear Mr. Hausauer:

This letter serves to comment and clarify our office's requirements for the above sites. It seems there were questions raised by Mr. Tommy Conner in regards to my August 4, 1997 letter.

Thank you for the notification of upcoming monitoring well installation and Risk Assessment submittal. We look forward to witnessing this field work and reviewing the report. As pointed out in Mr. Conner's August 12, 1997 letter, it appears that Motor Partner's has failed to add the chemical MTBE in their monitoring well analysis. By way of copy of this letter, Mr. Owens is requested to add this analyte in all future groundwater monitoring events. Our office also agrees that future groundwater elevation information should use common survey data. We ask that you make the referenced Kier & Wright survey data available to Mr. Gary Rogers.

Lastly, as clarification of the last paragraph in my August 4 letter, Mr. Owens is to provide a work plan for offsite well installation and a date for the provision of his Human Health Risk Assessment by September 5, 1997.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: Mr. Bill Owens, 2221 Olympic Blvd., Walnut Creek, CA 94595
Mr. Tommy Conner, Esq., 444 De Haro St., Suite 121, San Francisco, CA 94107
Mr. William Nagle, Esq., 345 Lorton Ave., Suite 204, Burlingame, CA 94010

Mr. R. Hausauer
StID # 4610
3927 E. 14th St.
August 14, 1997
Page 2.

Mr. James Mayol, Esq., P.O. Box 3049, Modesto CA 95353
Mr. A. Nick Shamiyeh, Esq., 2221 Olympic Blvd. #100,
Walnut Creek, CA 94595-0308
Mr. Brian Kelleher, P.O. Box 850, Cupertino CA 95014
Mr. William Theyskens, ATC Enviromental Inc., 2380 Qume Drive,
Suite C, San Jose, CA 95131
Mr. T. Fortner, Artesian Environmental, 229 Tewksbury Ave.,
Point Richmond, CA 94801
Mr. Gary Rogers, 2657 Bailey Ct., Fremont CA 94536
B. Chan, files
4-3927

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



STID# 4610 : RO# 468

✓ STID # 3682 : RO# 104
S (1234 40th AVE, OAKLAND)

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

June 21, 1996
StID # 4610 & 3682

Mr. Ruben Hausauer
6017 E. 14th St.
Oakland CA 94601

Re: 3927 E. 14th St., Oakland CA 94601

Dear Mr. Hausauer:

Our office has received correspondence from Mr. Tommy Conner requesting comment on the proposal to remove the formerly closed-in-place tank at the above referenced site. Soil samples would be taken beneath the tank on the sidewalls, if possible. Although the removal of this tank is not required by our office, there is the possibility that the additional information obtained from both observations and soil sample results may clarify the uncertainty as to whether the petroleum release from this tank was significant or not. Therefore, in addition to the previously proposed borings and monitoring wells, you may proceed to remove this tank.

Please submit your tank closure plan to our office as soon as possible should you decide to remove the tank. Please advise if your prior work plan is valid or if a revised version will be submitted.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: Mr. T. Conner, 444 De Haro St., Suite 121, San Francisco, CA
94107
Mr. J. Mayol, Mayol & Barringer, P.O. Box 3049, Modesto, CA
95353
W. Nagle, Special Master, 345 Lorton Ave., Burlingame, CA
94010
A. Nick Shamiyeh, 2221 Olympic Blvd., Suite 100, Walnut Creek
CA 94594
Mr. B. Kelleher, P.O. Box 850, Cupertino, CA 95014
Mr. G. Rogers, 2657 Bailey Ct., Fremont, CA 94536
G. Coleman, files
UST-3927

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#104

RAFAT A. SHAHID, Assistant Agency Director

January 3, 1996
StID # 3682

Mr. Bill Owens
2221 Olympic Blvd.
Walnut Creek, CA 94595

Alameda County
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510) 567-6700

**Re: Comment on Revised Work Plan for Phase II Site Investigation
at 1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

As requested during the December 12, 1995 Pre-enforcement hearing held at the County's office, Mr. Gary Rogers has submitted under his own letterhead, the revised work plan for phase II site investigation at 1234 40th Ave., Oakland. Our office has completed its review of the work plan and concurs with its tasking approach. As you're aware, the work plan calls for additional boreholes on and offsite, one additional offsite monitoring well, a soil vapor extraction test, a groundwater pump test and a subsequent Remedial Action Plan (RAP).

I have also reviewed the time schedule presented along with the work plan and it is acceptable. Please keep our office aware of any significant (>30days) changes in the performance of the proposed tasks or the submittal of reports.

I noticed that the location of the proposed well, MW-4, was moved westerly across 40th Ave. This is acceptable. Our office would like to recommend that the location of this well be "upgradient" to the location of the former underground tank located at 3927 E. 14th St. so as to avoid dispute of the contaminant source.

Please contact me prior to any field work so I may arrange to be onsite if possible. I may be reached at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. G. Rogers, 2657 Bailey Ct., Fremont, CA 94536
Mr. D. Gatto, F. H. Dailey, 800 Davis St., San Leandro 94577
Mr. J. Cummings, P.O. Box 2847, Fremont, CA 94536-2847
Mr. A. Fisher, Lake Merritt Plaza, Suite 1600, 1999 Harrison St., Oakland CA 94612

G. Coleman, files
wpap1234

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :

Motor Partners Site
1234 40th Ave.
Oakland CA 94601

Proof of Service of
Notice of Reset of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify

that I served Mr. Bill Owens, 2221 Olympic Blvd., Suite
100, Walnut Creek, CA 94595-0308

with a copy of the attached Notice of Reset of
Pre-Enforcement Review Panel on November 7, 1995
by certified mailer # P 072 565 849

Dated: 11/07/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
Motor Partners Site)
1234 40th Ave.)
Oakland CA 94601
(insert address of property)

Notice of Reset of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Reset Review Panel** will convene on **December 12, 1995 at 10:30** am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Reset Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location. Please bring to the review panel all records of underground storage tank usage and testing, as well as any written agreement between parties.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Reset Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Bill Owens
(name)
2221 Olympic Blvd., Walnut Creek, CA 94595-0308
(address)
2. Mr. Dan Gatto, F.H. Dailey Motor Company
(name)
800 Davis St., San Leandro, CA 94577
(address)

Dated: 11/06/95


(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :

Motor Partners Site
1234 40th Ave.
Oakland CA 94601

Proof of Service of
Notice of Reset of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify

that I served Mr. Dan Gatto, F. H. Dailey Motor Comp., 800
Davis St., San Leandro, CA 94577

with a copy of the attached Notice of Reset of
Pre-Enforcement Review Panel on November 7, 1995
by certified mailer # P 072 565 850

Dated: 11/07/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
Motor Partners Site)
1234 40th Ave.)
Oakland CA 94601
(insert address of property)

Notice of Reset of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Reset Review Panel** will convene on December 12, 1995 at 10:30 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Reset Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location. Please bring to the review panel all records of underground storage tank usage and testing, as well as any written agreement between parties.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Reset Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Bill Owens
(name)
2221 Olympic Blvd., Walnut Creek, CA 94595-0308
(address)
2. Mr. Dan Gatto, F.H. Dailey Motor Company
(name)
800 Davis St., San Leandro, CA 94577
(address)

Dated: 11/06/95

Barney Olo
(signature)

**Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division**

In Re The Property Known As :)
Motor Partners Site)
1234 40th Ave.)
Oakland CA 94601
 (insert address of property)

**Notice of
Pre-Enforcement
Review Panel**

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on **September 27, 1995** at **9:00** am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Bill Owens

(name)

2221 Olympic Blvd., Walnut Creek, CA 94595-0308

(address)

Dated: 8/15/95

Barney M. Chan

(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :

Motor Partners Site
1234 40th Ave.
Oakland CA 94601

Proof of Service of
Notice of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify

that I served Mr. Bill Owens, 2221 Olympic Blvd., Suite
100, Walnut Creek, CA 94595-0308

with a copy of the attached Notice of Pre-Enforcement Review

Panel on August 15, 1995 by certified

mailer # Z 196 176 911

Dated: 8/15/95

Barney M Chan
(signature)



DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

June 22, 1995
StID # 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Blvd.
Walnut Creek, CA 94595

NOTICE OF VIOLATION

Re: Request for Submission of Quarterly Monitoring Reports and Implementation of February 15, 1995 Phase II Work Plan for 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

This letter is to inform you of your delinquency in providing reports and performing appropriate work pursuant to **Article 11, Corrective Action Requirements, of the California Underground Storage Tank Regulations**. Recall, quarterly groundwater monitoring reports are to be performed at that frequency, at a minimum, unless there is a frequency change agreed upon by the Water Board or the Local Implementing Agency. In addition, work may proceed within 60 days of submission of your work plan to the regulatory agency.

The last quarterly monitoring report we have for this site was performed on 12/7/94. Therefore, two additional monitoring events should have occurred. We have not received any of these reports. You were also instructed to arrange your monitoring to co-incide with that of adjacent site, 3927 E. 14th St.

Our office conditionally approved the February 15, 1995 Growth Environmental work plan for additional site investigation on February 28, 1995. To this date, we are aware that this work has not been performed.

You are requested to provide the requested technical reports and initiate the February 15, 1995 work plan **within 30 days or by July 24, 1995**. Please notify me at least 48 working hours prior to any field activity. Failure to perform the requested work will cause this case to be considered for enforcement by the District Attorney Office or the Regional Water Quality Control Board (RWQCB). Ms. Cheryl Gordon of the SWRCB Clean-Up Fund is also being copied with this letter. Should she determine that you are not in compliance, your application for the Clean-Up Fund may be voided.

Mr. Bill Owens
StID # 3682
1234 40th Ave.
June 22, 1995
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County DA Office
G. Rogers, Growth Env. Services, 536 Stone Rd., Suite J,
Benicia, CA 94510
J. Makishima, files
Mr. John Cummings, P.O. Box 2847, Fremont CA 94536-2847
Mr. Art Fisher, Attorneys-At-Law, Lake Merritt Plaza, Suite
1600, 1999 Harrison St., Oakland CA 94612

NOV1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 28, 1995
StID # 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Blvd.
Walnut Creek, CA 94595

DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

**Re: Comment on February 15, 1995 Work Plan for Phase II Site
Characterization at 1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and completed its review of the above work plan as prepared by your consultant, Growth Environmental. I have spoken with Mr. Gary Rogers about my concerns and he has verbally agreed to make a number of modifications to the original work plan. Upon receipt of an updated site map which reconfigures the location of soil borings/wells, you may proceed with the proposed work.

The comments and conditions which should be incorporated in the work plan are:

1. A monitoring well should be installed in the middle of 40th Ave., between the existing wells, MW-2 and MW-3. This information along with the information from the well on the New Genico site (3927 E. 14th St.) may allow the determination of the source of contamination on the New Genico site. Another boring should also be installed to the west of MW-2 in the same general proximity to the curb as boring B-12.
2. Please co-ordinate the groundwater sampling of your wells with the sampling of the well on the New Genico site. Both phone numbers of the attorney and the consultant for the property owner of this site was given to Mr. Rogers. In addition, groundwater elevation readings should be done on all wells relative to mean sea level. Your future site maps should indicate the location of the New Genico well and include it's groundwater elevation in gradient maps if possible.
3. It was noticed that monitoring well MW-1 was inaccessible for sampling. Please correct this situation to include this well for sampling and groundwater elevation data in future quarterly events.

Mr. Bill Owens
StID # 3682
1234 40th Ave.
February 28, 1995
Page 2.

4. Mr. Rogers clarified the presumed locations of potential hydraulic lifts. Please outline their locations in your future maps. To analyze for hydraulic oil, please use the method TPHd and TPH mo while using hydraulic oil as a standard for quantitation.

Based on the results of this initial work, additional monitoring wells will be installed at the "edge" of the plume. Keep in mind the need to install a well in the middle of the street between MW-2 and MW-3. Your future reports should give a time schedule for all future activities.

As mentioned in the work plan, please contact me at least 48 hours prior to any field work so I may arrange to be present at some time.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, Growth Environmental Services, 536 Stone Rd.,
Suite J. Benicia, CA 94510
G. Coleman, files
Mr. John Cummings, P.O. Box 2847, Fremont CA 94536-2847
Mr. Art Fisher, Attorneys-At-Law, Lake Merritt Plaza, Suite
1600, 1999 Harrison St., Oakland CA 94612
2wpap1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



Ro# 104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 24, 1995
StID # 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

SECOND NOTICE OF VIOLATION

**Re: Request for Supplemental Work Plan Addendum for Subsurface
Investigation at 1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

On October 6, 1994, after reviewing the September 21, 1994 Phase I Site Investigation report by CEC, you were requested by this office to provide a supplemental work plan addendum for the above site by December 8, 1994. This work plan was to define the full extent of soil and groundwater contamination. After speaking with Mr. Gary Rogers of Growth Environmental (formerly CEC) I anticipated receiving a work plan by January 23, 1995. As of this date, our office has not received the requested work plan.

Please provide an appropriate work plan addendum to our office **within 30 days or by February 28, 1995**. Again, you are reminded that this should be considered a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested document may subject you to civil liability and cause the referral of this case to the RWQCB for enforcement. It will also jeopardize your eligibility to the State Cleanup Fund.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, CEC Environmental Consulting Inc., 32 West 25th
Ave., Suite 102, San Mateo, CA 94403

E. Howell, files
2NOV1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

October 6, 1994
StID # 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Blvd.
Walnut Creek, CA 94595

**Re: Comment on September 21, 1994 Phase I Site Investigation
at 1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and reviewed the above referenced report as prepared by your consultant, Certified Environmental Consulting (CEC). This report details the results of borings and monitoring wells and indicate significant soil and groundwater contamination, the extent of which is yet undetermined.

As mentioned in our conversation today, our office concurs with CEC's recommendation that additional investigation must be performed to determine the extent of the soil and groundwater contamination. There must also be an evaluation of the appropriate applicable remedial actions for this site, commonly referred to as a feasibility study. You have indicated that you taking steps to have a supplemental work plan prepared. After our office reviews your work plan, you will need to receive additional bids for the work plan pursuant to the Cleanup Fund requirement.

Please submit your supplemental work plan to our office **within 60 days or by December 8, 1994.**

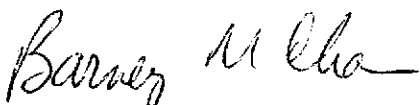
Upon review of the report, our requests the following items:

1. Please initiate quarterly monitoring of the existing wells. Since your initial sampling event occurred on 6/1/94, you should sample these wells ASAP and every three months thereafter. A report detailing your sampling results should be provided to our office within 45 days of each sampling event.
2. Please include the following in your quarterly monitoring report (QMR): a table with all preceding monitoring well results, a map showing the isoconcentration contour map for gasoline, benzene, diesel and motor oil in soil and groundwater and a groundwater gradient map. It was noticed that some of these items were absent from the Phase I report.

Mr. Bill Owens
StID # 3682
1234 40th Ave.
October 6, 1994
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, CEC Inc., 32 West 25th Ave., Suite 102, San Mateo,
CA 94403
E. Howell, files

4-1234wp

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

April 18, 1994
StID # 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Blvd.
Walnut Creek, CA 94595

**Re: Comment on April 6, 1994 Amendments to Work Plan at 1234
40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and reviewed the above report which amends the original March 15, 1994 work plan for the above site. This amendment is acceptable with the condition that the location of boring BH-3 be moved to the north of the former 1000 gallon gasoline tank. This will allow the determination of the lateral extent of soil and groundwater contamination in this direction.

You are reminded to contact me **48 hours prior to field activities** so I may arrange to be present if possible. You should schedule the performance of this work within 90 days.

You should contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, CEC Environmental Corp., 32 West 25th Ave.,
Suite 102, San Mateo, CA 94403
E. Howell, files
4wp1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0104

April 4, 1994
StID # 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Blvd.
Walnut Creek, CA 94595

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Re: Comment on March 15, 1994 Work Plan for Remediation at Motor Partners, 1234 40th Ave., Oakland CA 94601

Dear Mr. Owens:

Thank you for the submittal of the above referenced work plan as prepared by your consultant, Certified Environmental Corporation, CEC. Our office has completed its review of this report and have discussed its contents with Mr. Gary Rogers of CEC. With a number of modifications and additions our office agrees with this initial approach to determine the extent of soil and groundwater contamination.

The specific modifications/conditions requested by our office are:

1. Three monitoring wells will be required at this site, not one with two piezometers. Given the high soil contamination and free product seen in the excavation pits, three wells will be needed to determine the extent of the groundwater hydrocarbon plume.
2. In order to get a better geometry of the three wells for gradient determination and to better define the limits of the hydrocarbon plume, boring BH-4 should be converted into a monitoring well instead of P-1.
3. The location of P-1 can be omitted as long as an additional borehole is advanced within the building so that borings exist next to both the gasoline and waste oil tanks. Based on the results of these borings, the need for further characterization within the building may be determined.
4. For all borings and monitoring well soil samples, you should use the same screening criteria ie those samples exceeding 10ppm using your OVA instrument should be considered for analysis. If no sample meets that criteria, you should analyze the sample nearest groundwater. You must analyze each soil sample for any potential contaminant ie Total Petroleum Hydrocarbons as gas, as diesel and as motor oil plus BTEX, (Benzene, Toluene, Ethylbenzene and Xylenes).

Mr. Bill Owens
1234 40th Ave.
StID # 3682
April 5, 1994
Page 2.

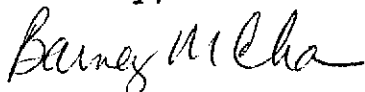
5. Keep in mind that depending on the results of this investigation, further investigation or remediation may be required, such as the extraction of water from one or both of the casings installed within the tank pits. Extended groundwater monitoring will be required given the elevated levels of hydrocarbon left in place.

6. Please send our office a revised site map indicating the new locations of the borings and monitoring wells. You should also acknowledge the modifications requested above. Please contact our office **48 hours prior** to any field activity so I may make arrangements to be present if possible.

Please provide the requested report to our office **within 30 days or by May 6, 1994.**

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, CEC Environmental Corp., 32 West 25th Ave.,
Suite 102, San Mateo, CA 94403
E. Howell, files
3wp1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 25, 1994
StID # 3682

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

NOTICE OF VIOLATION

**Re: Request for Work Plan Addendum for Subsurface Investigation
at 1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

On January 26, 1994 you were requested by this office to provide a work plan addendum for the above site by February 28, 1994 to address the obvious soil and groundwater contamination found during overexcavation activities. Visibly contaminated groundwater was removed from the two pits and extraction casings were implaced following the overexcavation. The contaminated soil was added to your previous soils at your nearby property. As of this date, our office has not received the requested work plan.

Please provide an appropriate work plan addendum to our office **within 30 days or by April 26, 1994**. Again, you are reminded that this should be considered a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested document may subject you to civil liability and cause the referral of this case for enforcement.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

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

Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, CEC Environmental Consulting Inc., 32 West 25th
Ave., Suite 102, San Mateo, CA 94403
E. Howell, files

NOV1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 26, 1994
StID #3682

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

**Re: Request for Work Plan Addendum for Subsurface Investigation at
1234 40th Ave., Oakland 94601**

Dear Mr. Owens:

Our office has received the analytical results from soil samples taken after the recent overexcavation of the two underground storage tanks at the above site. As you are aware, significant soil and groundwater contamination was observed at the time of the excavation. Physical constraints of the building, utilities and the street (40th Ave.) prevented further excavation. Because of apparent floating product in the gasoline pit, groundwater was pumped from both pits and an groundwater extraction casing was installed in both pits. The soil samples were taken from each of the four sidewalls of the pit above the groundwater level at approximately 8-9 feet below ground surface (BGS). The results of the analysis of these samples indicate elevated residual gasoline, diesel and oil and grease within these pits.

Because of these results, further work will be required to determine the extent of the soil and groundwater contamination. A minimum of three monitoring wells will be required to determine the site specific gradient. Please provide an appropriate work plan addendum to our office within 30 days or by February 28, 1994.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested document may subject you to civil liability. Please contact me at (510) 271-4530 if you have any questions.

Sincerely,

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

Barney M. Chan
Hazardous Materials Specialist

cc: G. Rogers, CEC Environmental Consulting Inc., 32 West 25th
Ave., Suite 102, San Mateo, CA 94403
E. Howell, files
wpad1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 18, 1993
StID #3682

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Mr. Bill Owens
Motor Partners
2221 Olympic Blvd.
Walnut Creek, CA 94595

**Subject: Review of November 12, 1993 Work Plan for Remediation at
1234 40th Ave., Oakland CA 94601**

Dear Mr. Owens:

Our office has received and reviewed the above referenced work plan as provided by your consultant, Certified Environmental Consulting (CEC). This work plan is very similar to the previously approved September 16, 1992 work plan from CEC, with the inclusion of the monitoring well construction design. Recall, the plan calls for the overexcavation of the pits, confirmation soil sampling plus the installation of monitoring well(s). In general, our office agrees with this work plan with the following condition/clarification:

1. Please note that the confirmatory soil samples from the former gasoline tank should be run for Total Petroleum Hydrocarbons as gasoline (TPHg) and BTEX. Those from the former waste oil tank should be run for TPHg, TPHd, BTEX, Total Oil and Grease (or equivalent), organic or total lead, chlorinated hydrocarbons and semi-volatile hydrocarbons.

2. Note that a minimum of one monitoring well will be required at this site. Unless groundwater gradient is presented in the near vicinity of this site indicating the same aquifer and geologic conditions as that at this site, three monitoring wells will be required to determine the site specific groundwater gradient.

With these conditions in mind, you should proceed with this work plan immediately. Please contact me prior to taking the confirmatory soil samples. You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Handwritten signature of Barney M. Chan in cursive.

Barney M. Chan
Hazardous Materials Specialist

cc: S. Klemetson, CEC Consulting Inc., 536 Stone Road, Suite J,
Benicia, CA 94510-1170
E. Howell, files 2wp1234-40

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 1, 1993
StID # 3682

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

NOTICE OF VIOLATION

**Re: Request for Implementation of Work Plan for Subsurface
Investigation at 1234 40th Ave., Oakland CA 94621**

Dear Mr. Owens:

Our office last wrote to you in my May 3, 1993 letter which requested an implementation date for the overexcavation and sampling of the two former fuel tanks at the above site. You were to inform our office within 15 days. To this date, our office has not been notified when this work will occur.

Recall, the September 16, 1992 work plan from Certified Environmental Consulting Inc. was conditionally approved in my March 1, 1993 letter. This letter agreed with the overexcavation of the the tank pits but also requested a work plan for the installation of monitoring well(s) at this site within 30 days. Again, our office has failed to receive such a work plan for monitoring well installation.

Our office has worked with you on the 41st Ave. tank removals and since that site has been resolved, we request that you initiate the overexcavation and provide a work plan for the installation of monitoring well(s) for the above site. Please initiate the proposed work and provide the requested report to our office **within 30 days or by November 3, 1993**. You should also notify me **48 working hours prior to field activities**.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

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

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
E. Howell, files
NOV1234-40

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0104

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 3, 1993
StID# 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

**Re: Request for Implementation of Work Plan for Subsurface
Investigation at 1234 40th Ave., Oakland CA 94621**

Dear Mr. Owens:

I recently witnessed the overexcavation and resampling of the former waste oil pit at 1238 41st Ave. Oakland. Recall, this work was part of the proposal by Semco and approved by our office. Upon inquiry to Semco employees, I was informed that you had not authorized the work proposed for the 1234 40th Ave. site. This would include the overexcavation and sampling of the two tank pits and the installation of monitoring well(s) to determine the extent of groundwater contamination.

Please be advised that you are required to implement **all aspects** of the proposed work plan, which includes the 41st Ave. site. You are reminded that the failure to perform the required investigation/remediation is considered the improper closure of an underground tank for which Section 25299 (5) of the California Health and Safety Code (CH&SC) authorizes civil penalties of not less than \$500 or more than \$5,000 per day per each tank which is not properly closed in accordance with the appropriate agency.

Please inform our office **within 15 days** of receipt of this letter when you will initiate the investigation at the 1234 40th Ave. site.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
E. Howell, files

2-wp1234

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO1158 (STID 2873)
1236-1238 41st Ave

✓ RO 104 (STID 3682)
1234 40th Ave.

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 20C
Oakland, CA 94621
(510) 271-4530

March 1, 1993
StID # 2873 and 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

**Re: Evaluation of Work Plan for Subsurface Investigation at 1236
and 1238-41st Ave. and 1234 40th Ave., Oakland 94621**

Dear Mr. Owens:

Thank you for the submission of the proposed work plan for further subsurface investigation for the above sites as prepared by Semco and Certified Environmental Consulting, Inc. Our office received this work plan on September 21, 1992. We have completed our review and you should initiate this work immediately with the following provisions:

1. Our office agrees with the general approach with re-excavating three of the four tank excavation pits and taking confirmation side wall and floor samples. Please be reminded of the appropriate analysis for the confirmation samples:

Gasoline tank- Total Petroleum Hydrocarbons as gas and BTEX (Benzene, Toluene, Ethylbenzene and Xylenes).

Waste Oil tank- Total Petroleum Hydrocarbons as gas, as diesel, BTEX, Chlorinated Solvents, Oil and Grease, specific heavy metals and Semi-volatiles. It was noted that semi-volatiles were omitted during the initial soil sample analyses. Please inform me 48 working hours in advance to witness any resampling. Please identify the certified lab to be used to analyze the soil samples.

Our office agrees that no further work is necessary at the gasoline tank on 41st Ave. In addition, a lone sample defining the vertical extent of contamination may be appropriate in the waste oil tank excavation on 41st Ave. I would, however, like to be present to observe the overexcavated tank pit prior to agreeing to the need for only one sample.

2. The work plan submitted failed to address the need for a groundwater investigation. Recall, because of the initial soil contamination found, you are required to perform a groundwater investigation. Monitoring wells will minimally be required to be

Mr. Bill Owens
StID #s 2873 and 3682
1236 and 1238-41st and 1234 40th Ave.
March 1, 1993
Page 2.

installed within ten feet of the former tank pits in the confirmed downgradient direction. If gradient information is not available, you will need to install a minimum of three wells per site. Please provide a workplan for the installation of monitoring wells to our office within 30 days of receipt of this letter.

As stated in my previous letter, continual inactivity at these site will be considered the improper closure of underground tanks and will cause this case to be referred to the District Attorney's Office for enforcement.

You may contact me at (510) 271-4530 if you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
D. McCain, Semco, 1806 Leslie St., San Mateo, CA 94402
S. Klemetson, CEC Environmental Consulting Inc., 3160 Crow Canyon, Suite 350, San Ramon, CA 94583
E. Howell, files

WP-1234-36-38

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01158 (STID 2873) #1236
41st Ave.

✓ R0104 (STID 3682) #1234

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR 40th Ave.

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Certified Mailer # P113 815 499

February 10, 1993
StID# 2873 and 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard,
Walnut Creek, CA 94595

FINAL NOTICE OF VIOLATION

**Re: Request for Work Plan for Subsurface Investigation at 1236
and 1238- 41st Ave. and 1234 40th Ave., Oakland 94621**

Dear Mr. Owens:

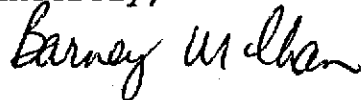
Recall that you were first informed of the requirement to provide a workplan for subsurface investigation, subsequent to the removal of underground tanks at the above sites, in a December 24, 1990 letter from Ms. Cynthia Chapman of this office. You were given 45 days to provide this report. Next, in my April 13, 1992 letter, you were again requested to provide this office with an appropriate workplan for this investigation. That time you were given 30 days to provide this document. You were also given a copy of Appendix A, Workplan for Initial Subsurface Investigation, to use as a guidance document for your workplan. To this date our office has not received any reports or any written correspondence from you regarding these sites. Please be advised that this is your **Final Notice Of Violation**. Please provide an appropriate workplan to our office **within 30 days** of receipt of this letter otherwise this case will be referred to the District Attorney Office for enforcement. In addition, your site may be referred to the Regional Water Quality Control Board (RWQCB) for their issuance of a Cleanup and Abatement Order.

Our office considers your inactivity at these sites the improper closure of underground tanks for which Section 25299 (5) of the California Health and Safety Code (CH&SC) authorizes civil penalties of not less than \$500 or more than \$5,000 per day per each tank which is not properly closed in accordance with the requirements of the appropriate agency.

Mr. Bill Owens
1236 & 1238 41st and 1234 40th Ave.
StID # 2873 and 3682
Page 2.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
E. Howell, files

FNOV-1236

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO1158 (STID 2873-
1236-1238 41st Ave)

✓ Ro 104 (STID 3682 - 1234
40th)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

September 23, 1992
STID # 2873 and 3682

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

Re: Comment on Site Mitigation Work Plan for Owens Motor
Partners at 1234 40th Ave., 1236 and 1238 41st Ave.,
Oakland CA 94621

Dear Mr. Owens:

Thank you for submitting the site mitigation work plan for the
above sites as prepared by SEMCO. I have completed my review of
this proposal and it is acceptable as an initial step of the site
investigation with the following conditions:

1. Prior to initiating any work a site specific Health and
Safety (H&S) Plan must be submitted to our office. The plan must
include at a minimum the name and responsibilities of the site
H&S officer, the identification of H&S hazards of each work task,
specific personal protective equipment to be used along with the
environmental sampling and monitoring devices to be used,
measures to be taken to secure the site, an emergency/contingency
plan showing the directions to the nearest hospital,
documentation that all site workers have received the appropriate
training per 29 CFR 1910.120 and a page for employees to sign
indicating they have read and will comply with site H&S plan.
2. You are requested to backfill all re-excavated pits with
either clean or approved remediated and reanalyzed backfill to
avoid the need for further re-excavation.
3. Please contact this office at least 48 working hours in
advance to schedule the witnessing the resampling of appropriate
areas within the pits.
4. Please be advised that you will be required to install
monitoring well(s) at the 40th Ave. site to investigate the
extent of ground water contamination. A work plan detailing the
locations and typical construction standards of these wells
should be submitted for review by our office by a certified
professional.

Mr. Bill Owens
Motor Partners
STID # 2873 and 3682
September 23, 1992
Page 2.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office
R. Hiett, RWQCB
D. McCain, SEMCO, 1741 Leslie St., San Mateo, CA 94402
S. Klemetson, Certified Environmental Consulting Inc.,
140 West Industrial Way, Benicia, CA 94510
E. Howell, files

wp-MrOwens

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



✓ R0104 (1234 40th.)

R01158 (1236-1238
41st.)

RAFAT A. SHAHID, Assistant Agency Director

April 13, 1992
STID #2873 and 3682

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

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard,
Walnut Creek, CA 94595

Re: Request for Workplan for Subsurface Investigation at 1236
and 1238- 41st Avenue and 1234 40th Ave., Oakland CA 94621

Dear Mr. Owens:

Our division has received the results of soil and water samples subsequent to underground storage tank removals performed at the above referenced sites. A total of four underground tanks were removed at these sites in October of 1990. The tank removals were witnessed by Ms. Cynthia Chapman of our office. Considerable petroleum hydrocarbon contamination was found in soil samples taken at the time of the removals. In a December 24, 1990 letter addressed to you, Cynthia informed you of your obligation to perform further subsurface investigation at both sites. This letter is reiterate the need for you to do this additional investigation at these sites and provide our office with closure reports and a work plan for further investigation. In Cynthia's letter you were requested to submit a work plan to our office within 45 days of the date of that letter. To this date we have not received this information.

To summarize our office's concerns I would like to list the current requested items:

1. It was noted that the soil samples taken from under the tanks removed at 1236 and 1238 41st Ave. contained low levels of petroleum although the soil stockpiled soils had elevated oil and grease. Unfortunately, these stockpiled soils were reused and the tank pits resurfaced. In order to avoid a groundwater investigation, you must re-excavate and remove this soil, dispose of it properly and take confirmation soil samples which indicate excavation to non-detectable amounts of hydrocarbon contamination.
2. It is clear that the elevated gasoline, diesel, oil and grease and BTEX (benzene, toluene, ethyl benzene and xylenes) concentrations in samples from 1234 40th Ave. require a soil and groundwater investigation. In addition to Ms. Chapman's 1990 letter, I have enclosed the document, Workplan for Initial

Mr. Bill Owens
1236,1238 41st and 1234 40th Ave.
April 13, 1992
STID 2873,3682
Page 2.

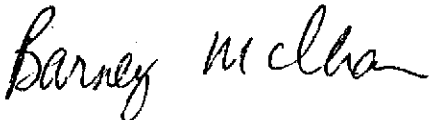
Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB). Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. The RWQCB is the agency entrusted to protect the waters of the state.

Please submit a workplan in addition to a complete tank closure report to this office within thirty (30) days of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiatt. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you civil liabilities.

Our office also has a Memorandum of Understanding (MOU) with the Department of Health Services (DOHS). As such, we are empowered to enforce the regulations of the California Health and Safety Code (CH&SC), Division 20, Chapter 6.7. I point your attention to Section 25298 (c) 4 of the CH&SC which states that no person shall close an underground tank unless that person has taken steps to demonstrate to the appropriate agency that the site has been investigated to determine if there are any present, or were past, releases, and if so that appropriate corrective or remedial actions have been taken. Section 25299 (5) allows for the civil penalty of not less than \$500 or more than \$5,000 for each underground tank for each day which the operator or owner fails to properly close an underground tank as required by Section 25298. You are reminded that failure to submit the requested documents may subject you to these civil liabilities in addition to referral of this case to the District Attorney Office for enforcement. You may contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan, Hazardous Materials Specialist
enclosure

cc: M. Thomson, Alameda County District Attorney Office
R. Hiatt, RWQCB
C. Kiper, SEMCO, 1741 Olympic Blvd., Walnut Creek, CA 94595
WP 1234-40thetc

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO1158 (1236-38 41st Ave)
✓ RO104 (1234 40th Ave)

December 24, 1990

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

Mr. Bill Owens
Motor Partners
2221 Olympic Boulevard
Walnut Creek, CA 94595

Dear Mr. Owens:

The Alameda County Hazardous Materials Division has reviewed the laboratory analyses provided to this office by Semco for the underground tank removal activities at 1234 - 40th Avenue and at 1236 and 1238 - 41st Avenue, Oakland, California. A 1,000 gallon tank and a 500-gallon waste oil tank were removed from the 40th Avenue location, a 300-gallon gasoline tank was removed from 1236 - 41st Avenue, and a 300-gallon waste oil tank was removed from 1238 - 41st Avenue on October 12, 1990.

At the 40th Avenue site significant contamination was found in soil samples taken from both tanks. The 1,000-gallon tank had total petroleum hydrocarbons (TPH) as gasoline at 1,600 ppm, benzene at 3,500 ppb, toluene at 5,500 ppb, ethylbenzene at 43,000 ppb, and xylenes at 15,000 ppb. The 500-gallon waste oil tank had 650 ppm TPH as diesel, 570 ppm TPH as gasoline, 4,000 ppm Oil & Grease, toluene at 470 ppb, ethylbenzene at 1,200 ppb, and xylenes at 8,500 ppb.

At the 41st Avenue sites, no contamination was found in the samples taken from the tank excavation and from the samples taken from the gasoline tank stockpile; however, the stockpile soil from the waste oil tank show Oil & Grease at 1,400 ppm, TPH as gasoline at 150 ppm, toluene at 120 ppb, ethylbenzene at 340 ppb, and xylenes at 3,600 ppb.

The level of contamination found in the soil samples from the 40th Avenue site require that Motor Partners perform a soil and ground water investigation to determine the extent of the contamination associated with the underground storage tanks. For the 41st Avenue site, the contaminated stockpile soil that was placed in the pit should be excavated and removed to an appropriate disposal facility.

You are required to complete a workplan that provides information on how the subsurface investigation will proceed. Please submit this workplan to our office within 45 days of the date of this letter. Our office will be the lead agency overseeing the soil and groundwater investigation at this site. The San Francisco Bay Regional Water Quality Control Board (RWQCB) has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's investigation requirements. However, please be aware that you are responsible for diligent actions to protect the waters of the State. A format for the workplan and items to address is outlined on the following pages.

Motor Partners
December 24, 1990
Page 2

I. INTRODUCTION

- A. Statement of Scope of Work
- B. Site location
- C. Background
- D. Site History

Provide a brief description of the historic site use and ownership information, type of business and associated activities that take place at the site, types and location of any hazardous materials used on site, and a description of any known hazardous materials spills, leaks, or accidents. Provide a history of the use of the underground tank(s), its contents, and include the date of installation.

II. SITE DESCRIPTION

- A. Provide a map which shows streets, site buildings, underground tank locations, subsurface conduits and utilities, on-site and nearby wells, and nearby streams or water bodies.
- B. Provide a description of the hydrogeologic setting of the site and surrounding area. Include a description of any subsurface work previously done at the site.

III. PLAN FOR DETERMINING EXTENT OF SOIL CONTAMINATION ON SITE

- A. Describe how the extent of soil contamination associated with the former underground tanks will be determined.
- B. Describe the sampling methods and procedures to be used. If soil samples are to be collected for contamination delineation, consult the RWQCB guidelines for soil sampling protocols. During drilling of all boreholes and monitoring wells, undisturbed soil samples are to be collected at a minimum of every five feet in the unsaturated zone and at any changes in lithology for logging and analytical purposes. Borings and wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. Their number is 415/484-2600. Borings and wells are to be logged from undisturbed soil samples. Logs shall include observed soil odors; blow counts shall be expressed in blows per 6 inches of drive.

Motor Partners
December 24, 1990
Page 3

If a soil gas survey is planned, the location of survey points must be identified along with the analytical methods and techniques to be used. A quality assurance plan for field analyses must be submitted.

- C. Soil samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

IV. DETERMINATION OF GROUNDWATER QUALITY

- A. A minimum of three monitoring wells must be installed to determine the groundwater gradient. If the verified down-gradient location has been established, then complete gradient data must be submitted and one monitoring well will be required in the down-gradient direction.
- B. Monitoring wells shall be designed and constructed to be consistent with the RWQCB guidelines and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based on particle analysis from each stratigraphic unit in at least one boring on the site and on the types of groundwater contaminants present. The well screen must be situated to intercept any floating product from both the highest and lowest ground water levels. All wells shall be surveyed to mean sea level to an established benchmark to 0.01 foot.
- C. Monitoring wells must be sampled for dissolved and floating constituents. Any free product is to be measured with an optical probe or by another method shown to have equivalent accuracy.
- D. A groundwater gradient map shall be developed for every water level data set. If the gradient fluctuates, water level measurements must continue to be made monthly until a gradient pattern is established.
- E. Sample monitoring wells monthly for three consecutive months. Free product thicknesses and water levels shall be measured in all wells for each sampling event before any purging or sampling activities are begun. After three consecutive months of sampling, all monitoring wells must be sampled at least quarterly for one year. Groundwater levels and quality must be monitored quarterly for a minimum of one year, even if no contamination is identified.

Motor Partners
December 24, 1990
Page 4

- F. Groundwater samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

V. INTERPRETATION OF HYDROGEOLOGIC DATA

- A. Water level contour maps showing groundwater gradient direction and free and dissolved product plume definition maps of each contaminant constituent should be prepared routinely and submitted with other sampling results.
- B. The hydrogeologic characteristics of the aquifer must be described. An estimate of vertical transmissivity, based on a laboratory permeability test or a pump test, is required for any unit identified as a clay. Identification of the clay should be verified by particle analysis (ASTM D-422).
- C. The cross sections, groundwater gradients (horizontal and vertical) should be interpreted to explain pollution migration patterns.

VI. DETERMINATION OF THE TYPES OF BENEFICIAL USES OF THE GROUNDWATER

The State has defined all San Francisco Bay Area water as having beneficial uses; however, the types of beneficial uses vary and must be determined in order to establish appropriate cleanup levels. Beneficial uses include drinking water, irrigation, groundwater recharge, wild life habitat, contact and non-contact recreation, fish migration, etc. A drinking-water beneficial use "aquifer" is defined as an aquifer yielding water of less than 3,000 units of total dissolved solids and yielding water at a rate of at least 200 gallons per day.

VII. SITE SAFETY PLAN

VIII. REPORTING

- A. A technical report must be submitted, within 30 days of completion of the investigation, which presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items: Site history information, boring and well construction logs, records of field observations and data, chain-of-custody forms, water level data, water level contour map showing groundwater gradient direction, contaminant plume maps, tabulations of soil and

Motor Partners
December 24, 1990
Page 5

groundwater contaminant concentrations, status of soil contamination characterization, description of any remedial work performed, laboratory-originated analytical results for all soil and groundwater samples analyzed, copies of TSDF-to-Generator manifests for any hazardous wastes hauled off-site, a description on where non-hazardous contaminated soils went, and any recommendations for additional investigative or remedial work.

- B. All reports and proposals must be signed by a California-Certified Engineering Geologist, California-Registered Geologist or a California-Registered Civil Engineer. A statement of qualifications should be included in all reports. Borehole and monitoring well installation and logging, and impact assessments will require the signature of such a professional.
- C. The technical report must be submitted with a cover letter from Motor Partners and received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of the company.

Any stockpiled soil associated with tank removal activities or investigation activities must be sampled to determine the proper disposition of the soil. The number of samples collected from the stockpile(s) must be adequate to characterize the soil for the appropriate soil handling method.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to the RWQCB to the attention of Lester Feldman. The address is:

Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

We will require a deposit/refund for reviewing the work plan and for oversight of your case. Please remit \$600.00, payable to Alameda County.

Motor Partners
December 24, 1990
Page 6

Should you have any questions concerning the contents of this letter or the status of this case, please feel free to contact me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Mr. Lester Feldman, RWQCB