

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-11-00

20125

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

December 8, 2000

Molly Faraji
2000 Stratton Rd.
Walnut Creek, CA 94598

Dear Ms. Faraji:

Subject: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
StId 1130

Communication with the City of Oakland Fire Services Agency determined that the underground tanks at the aforementioned site have not been used for awhile and have not been properly closed. Thus, the Leaking Underground Tank case cannot be finished until the underground tanks have been properly closed. Contact the City of Oakland Fire Services Agency, 510/238-7759, for the requirements to properly close the underground tanks. Meanwhile, the groundwater monitoring wells, STMW-1, STMW-2, STMW-3, STMW-4, STMW-5, STMW-6, and the production well, W-4, should not be decommissioned until the underground tank closure has been resolved.

If you have any questions other than the requirements to properly close the underground tanks, I can be reached at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

re

C: Leroy Griffin, City of Oakland Fire Services Agency, Office of Emergency Services,
Hazardous Materials Management Program, 505-14th St., 5th Floor, Oakland, CA 94612

Frank Hamedi-Fard, Lawrence Koo, Enviro Soil Tech Consultants, 131 Tully Rd.,
San Jose, CA 95111

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-6-00

2025

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

December 5, 2000

Molly Faraji
2000 Stratton Rd.
Walnut Creek, CA 94598

Dear Ms. Faraji:

Subject: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
StId 1130

This office and the California Regional Water Quality Control Board, San Francisco Bay Region, have reviewed the case closure summary for the above referenced site and concur that no further action related to the underground tank release is required at this time. Before a remedial action completion letter is sent, the onsite monitoring wells, STMW-1, STMW-2, STMW-3, STMW-4, STMW-5, STMW-6, and the production well, W-4, must be decommissioned. Please submit a copy of the well destruction permit and a report of the well destruction so a closure letter can be issued. (Well destruction permits may be obtained from James Yoo, Alameda County Public Works Agency, at 510/670-6633.)

If you have any questions, I can be reached at (510) 567-6746.

Sincerely,

A handwritten signature in black ink that reads "Don Hwang". The signature is written in a cursive, flowing style.

Don Hwang
Hazardous Materials Specialist

ll

C: Frank Hamedi-Fard, Lawrence Koo, Enviro Soil Tech Consultants, 131 Tully Rd.,
San Jose, CA 95111

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 9-14-2000

20125

September 13, 2000

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

Molly Faraji
2000 Stratton Rd.
Walnut Creek, CA 94598

Dear Ms. Faraji:

Subject: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
StId 1130

Previously, you were requested to submit disposal records for the soil removed from the pipeline trench. Additionally, a review of the history of the site found a discrepancy as to whether any soil was removed after the waste oil spill of May 1989. Please submit disposal records for the soil removed from the pipeline trench if available and let us know if any soil was removed after the waste oil spill of May 1989.

If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Frank Hamedi-Fard, Lawrence Koo, Enviro Soil Tech Consultants, 131 Tully Rd.,
San Jose, CA 95111
LH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 9-5-2005

00125

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

August 30, 2000

Molly Faraji
2000 Stratton Rd.
Walnut Creek, CA 94598

Dear Ms. Faraji:

Subject: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
StId 1130

When your file was reviewed for case closure, no disposal records for the soil removed from the pipeline trench could be found. Please review your records for any documentation that would indicate the disposition of the soil removed from the pipeline trench and submit them to this office.

If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Frank Hamedi-Fard, Lawrence Koo, Enviro Soil Tech Consultants, 131 Tully Rd.,
San Jose, CA 95111

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20125

April 11, 2000

Manijeh Faraji
2000 Stratton Rd.
Walnut Creek, CA 94598

Dear Ms. Faraji:

Subject: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
Std 1130

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

You have informed Alameda County Environmental Health that you intend to sell your property located at 2740-98th Ave., Oakland, CA in Alameda County ("Site"). Alameda County Environmental Health has been the lead agency in connection with the investigation and remediation of soil and groundwater contamination at the site. Over the past year, Ms. Faraji has been sent letters requesting additional information/work at this site. She met with me today and committed to provide the additional information or to have the additional work performed.

An extensive subsurface investigation has been conducted at the Site. Technical reports submitted by Ms. Faraji's consultants indicate that borings were drilled where evidence existed of potential pollutant releases. Groundwater monitoring wells have been installed to characterize groundwater contamination.

Alameda County Environmental Health considers Ms. Faraji to be the primarily responsible party in connection with the remediation of contamination at the Site, and Alameda County Environmental Health expects Ms. Faraji to implement remedial action until closure is obtained. Alameda County Environmental Health does not pursue prospective purchasers where the primarily responsible party has the financial resources necessary to conduct the remediation, and where that responsible party is satisfactorily engaged in active remediation. This site is in the state cleanup fund, so the primary responsible party must stay involved to remain in the cleanup fund.

Please contact me at (510) 567-6746 if you have any additional questions.

Sincerely,



Don Hwang
Hazardous Materials Specialist

C: file



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 12/3/99
Including cc's

20125

Certified Mail P 155 530 617

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

December 2, 1999

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

2nd NOTICE OF VIOLATION

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
Stid 1130

Dear Ms. Ghofrani:

On October 8, 1999, May 21, 1999, and March 25, 1999, you were sent letters requesting the following information:


- 1) A review of "Soil Sampling Beneath Removed UST at the Property Located at 2740-98th Ave., Oakland, CA, Dec. 18, 1998, File No. 7-93-556-SI" by Enviro Soil Tech Consultants found that the samples were not analyzed for chlorinated hydrocarbons (Cl HC), polychlorinated biphenyls (PCB), pentachlorophenol (PCP), polynuclear aromatics (PNA), or creosote. Sampling for these constituents is required.
- 2) Also, the above report did not include disposal records for the stockpiled soil. Disposal records for the stockpiled soil are required.
- 3) The report was prepared for Molly Ghofrani, 2000 Stratton Rd., Walnut Creek, CA 94598. Our records have Kiyoumars Ghofrani as the responsible party. If this has changed, then Molly Ghofrani's telephone numbers are needed.
- 4) Submit a copy of "Dorothy Radbruch's 1969 U.S. Geological Survey map GQ-769, Aerial and Engineering Geology of the Oakland East Quadrangle, California, Scale 1:24,000". This map is needed to show the "... active spring at the base of the hill across 98th Ave." mentioned on page 7 of the report, "Additional Subsurface Investigation for the Property... 2740-98th Ave., Oakland, CA, Oct. 3, 1996".
- 5) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and asked to fill out and return the form, "SAMPLE LETTER (2): LIST OF LANDOWNERS FORM".

This letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Section 25299.37 and 25299.7. Failure to comply with the request will result in referral of this case to the Alameda County District Attorney's Office. You are further advised that failure to comply may subject you to penalties of up to \$5000 per day.

Thus far, the information requested has not been received. Please submit the information required within 30 days.

If you have any questions, please call me at (510) 567-6746.

Sincerely,


Don Hwang
Hazardous Materials Specialist

C: Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111
file
L.S.



October 8, 1999

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

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

NOTICE OF VIOLATION

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605; Stid 1130

Dear Ms. Ghofrani:

On October 7, 1999, I called Sabrina Baptiste of the Law Office of Robert Shepard. She stated that the aforementioned property didn't complete escrow. Therefore, you are still responsible for providing the information requested:

- 1) A review of "Soil Sampling Beneath Removed UST at the Property Located at 2740-98th Ave., Oakland, CA, Dec. 18, 1998, File No. 7-93-556-SI" by Enviro Soil Tech Consultants found that the samples were not analyzed for chlorinated hydrocarbons (Cl HC), polychlorinated biphenyls (PCB), pentachlorophenol (PCP), polynuclear aromatics (PNA), or creosote. Sampling for these constituents is required. Also, the above report did not include disposal records for the stockpiled soil. Disposal records for the stockpiled soil are required.
- 2) The report was prepared for Molly Ghofrani, 2000 Stratton Rd., Walnut Creek, CA 94598. Our records have Kiyoumars Ghofrani as the responsible party. If this has changed, then Molly Ghofrani's telephone numbers are needed.
- 3) Submit a copy of "Dorothy Radbruch's 1969 U.S. Geological Survey map GQ-769, Aerial and Engineering Geology of the Oakland East Quadrangle, California, Scale 1:24,000". This map is needed to show the "... active spring at the base of the hill across 98th Ave." mentioned on page 7 of the report, "Additional Subsurface Investigation for the Property... 2740-98th Ave., Oakland, CA, Oct. 3, 1996".
- 4) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and asked to fill out and return the form, "SAMPLE LETTER (2): LIST OF LANDOWNERS FORM".

Please submit the information requested within 30 days. If ownership of the property has indeed changed, then you need to let me know. I may be reached at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Sabrina Baptiste, Law Office of Robert Shepard, 1231 Fulton St. #1,
San Francisco, CA 94117
Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111
file

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0125

September 17, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605; Stid 1130

Dear Ms. Ghofrani:

On July 13, 1999, I received a call from Sabrina Baptiste representing the Law Office of Robert Shepard. She stated that the aforementioned property was in escrow and should close July 24, 1999, then it would take an additional 60 days to determine who would be responsible for providing the information requested:

- 1) A review of "Soil Sampling Beneath Removed UST at the Property Located at 2740-98th Ave., Oakland, CA, Dec. 18, 1998, File No. 7-93-556-SI" by Enviro Soil Tech Consultants found that the samples were not analyzed for chlorinated hydrocarbons (Cl HC), polychlorinated biphenyls (PCB), pentachlorophenol (PCP), polynuclear aromatics (PNA), or creosote. Sampling for these constituents is required. Also, the above report did not include disposal records for the stockpiled soil. Disposal records for the stockpiled soil are required.
- 2) The report was prepared for Molly Ghofrani, 2000 Stratton Rd., Walnut Creek, CA 94598. Our records have Kiyoumars Ghofrani as the responsible party. If this has changed, then Molly Ghofrani's telephone numbers are needed.
- 3) Submit a copy of "Dorothy Radbruch's 1969 U.S. Geological Survey map GQ-769, Aerial and Engineering Geology of the Oakland East Quadrangle, California, Scale 1:24,000". This map is needed to show the "... active spring at the base of the hill across 98th Ave." mentioned on page 7 of the report, "Additional Subsurface Investigation for the Property... 2740-98th Ave., Oakland, CA, Oct. 3, 1996".
- 4) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and asked to fill out and return the form, "SAMPLE LETTER (2): LIST OF LANDOWNERS FORM".

Please let me know if someone other than you is responsible for providing the above information. If you have any questions, call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist
L.S.

C: Sabrina Baptiste, Law Office of Robert Shepard, 1231 Fulton St. #1,
San Francisco, CA 94117
Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111
file



ROZS

ENVIRONMENTAL HEALTH SERVICES

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

June 24, 1999

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

NOTICE OF VIOLATION

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
Stid 1130

Dear Ms. Ghofrani:

On March 25, 1999, and May 21, 1999, you were sent letters requesting the following information:

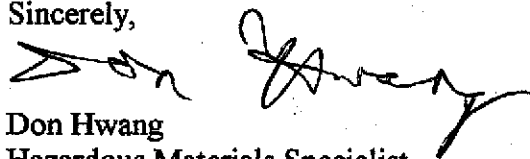
- 1) A review of "Soil Sampling Beneath Removed UST at the Property Located at 2740-98th Ave., Oakland, CA, Dec. 18, 1998, File No. 7-93-556-SI" by Enviro Soil Tech Consultants found that the samples were not analyzed for chlorinated hydrocarbons (Cl HC), polychlorinated biphenyls (PCB), pentachlorophenol (PCP), polynuclear aromatics (PNA), or creosote. Sampling for these constituents is required.
- 2) Also, the above report did not include disposal records for the stockpiled soil. Disposal records for the stockpiled soil are required.
- 3) The report was prepared for Molly Ghofrani, 2000 Stratton Rd., Walnut Creek, CA 94598. Our records have Kiyoumars Ghofrani as the responsible party. If this has changed, then Molly Ghofrani's telephone numbers are needed.
- 4) Submit a copy of "Dorothy Radbruch's 1969 U.S. Geological Survey map GQ-769, Aerial and Engineering Geology of the Oakland East Quadrangle, California, Scale 1:24,000". This map is needed to show the "... active spring at the base of the hill across 98th Ave." mentioned on page 7 of the report, "Additional Subsurface Investigation for the Property... 2740-98th Ave., Oakland, CA, Oct. 3, 1996".
- 5) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and asked to fill out and return the form, "SAMPLE LETTER (2): LIST OF LANDOWNERS FORM".

This letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Section 25299.37 and 25299.7. Failure to comply with the request will result in referral of this case to the Alameda County District Attorney's Office. You are further advised that failure to comply may subject you to penalties of up to \$5000 per day.

Thus far, the information requested has not been received. Please submit the information required within 30 days.

If you have any questions, please call me at (510) 567-6746.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", written in a cursive style.

Don Hwang
Hazardous Materials Specialist

C: Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111
file

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R-0125

ENVIRONMENTAL HEALTH SERVICES

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

May 21, 1999

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
Stid 1130

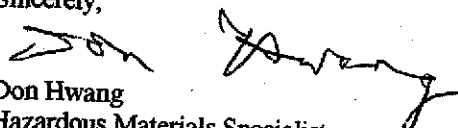
Dear Ms. Ghofrani:

On March 25, 1999, you were sent a letter requesting additional information.

- 1) A review of "Soil Sampling Beneath Removed UST at the Property Located at 2740-98th Ave., Oakland, CA, Dec. 18, 1998, File No. 7-93-556-SF" by Enviro Soil Tech Consultants found that the samples were not analyzed for chlorinated hydrocarbons (CHC), polychlorinated biphenyls (PCB), pentachlorophenol (PCP), polynuclear aromatics (PNA), or creosote. Sampling for these constituents is required.
- 2) Also, the above report did not include disposal records for the stockpiled soil. Disposal records for the stockpiled soil is required.
- 3) The report was prepared for Molly Ghofrani, 2000 Stratton Rd., Walnut Creek, CA 94598. If this is a change of responsible party from Kiyoumars Ghofrani, the telephone numbers are requested.
- 4) Also, "Dorothy Radbruch's 1969 U.S. Geological Survey map GQ-769, Aerial and Engineering Geology of the Oakland East Quadrangle, California, Scale 1:24,000", was to be submitted to show the "...active spring at the base of the hill across 98th Ave." mentioned on page 7 of the report, "Additional Subsurface Investigation for the Property... 2740-98th Ave., Oakland, CA, Oct. 3, 1996".

Please submit the information required within 30 days. If you have any questions, please call me at (510) 567-6746.

Sincerely,


Don Hwang
Hazardous Materials Specialist

C: Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111
file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



PO125

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

May 21, 1999

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
Stid 1130

Dear Ms. Ghofrani:

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

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

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

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

Ms. Ghofrani
Page 2 of 2
May 21, 1999

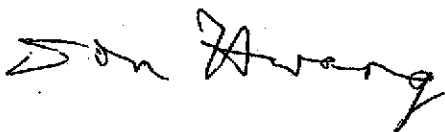
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

Please call me at (510) 567-6746 should you have any questions about the content of this letter.

Sincerely,



Don Hwang
Hazardous Materials Specialist

Enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 125

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

March 25, 1999

Molly Ghofrani
2000 Stratton Rd.
Walnut Creek, CA 94598

Re: Freeway Station & Service, 2740-98th Ave., Oakland, CA 94605
Stid 1130

Dear Ms. Ghofrani:

"Soil Sampling Beneath Removed UST at the Property Located at 2740-98th Ave., Oakland, CA, Dec. 18, 1998, File No. 7-93-556-SI" by Enviro Soil Tech Consultants was reviewed. The following information was missing and is required:

- 1) The samples were not analyzed for chlorinated hydrocarbons (Cl HC), polychlorinated biphenyls (PCB), pentachlorophenol (PCP), polynuclear aromatics (PNA), or creosote.
- 2) Disposal records for the stockpiled soil.
- 3) The above report was prepared for Molly Ghofrani, 2000 Stratton Rd., Walnut Creek, CA 94598. If this is a change of responsible party from Kiyoumars Ghofrani, please also provide telephone numbers.
- 4) Also, "Dorothy Radbruch's 1969 U.S. Geological Survey map GQ-769, Aerial and Engineering Geology of the Oakland East Quadrangle, California, Scale 1:24,000", was to be submitted to show the "... active spring at the base of the hill across 98th Ave." mentioned on page 7 of the report, "Additional Subsurface Investigation for the Property... 2740-98th Ave., Oakland, CA, Oct. 3, 1996".

If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

cc: Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111

file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0125

ENVIRONMENTAL HEALTH SERVICES

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

May 13, 1998

ATTN: J R Sessions

Sessions Tank Linkers Inc
664 W Main Rd P O Box 731
El Centro CA 92243

RE: Project # 1279A - Type MOD
at 2740 98th Ave in Oakland 94605

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$329.50, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Tom Peacock', is written over the typed name.

Tom Peacock, Manager
Environmental Protection

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#125

December 2, 1997

Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Av.
Oakland CA 94605

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

RE: Risk Evaluation for 2740 98th Av., Oakland 94605 (Our site # 1130)

Dear Mr. Ghofrani:

Recently I assumed case review responsibility for your site. I have read the file and noted that your consultant believes the case may be ready for closure. I agree that the threat of groundwater contamination seems to be diminishing. Thus, I will not require further groundwater monitoring. The wells must be properly destroyed prior to closure, should you have no further use for them. Well destruction must be performed under a permit from Alameda County Public Works Department. You may contact Andreas Godfrey of Public Works for more information at (510)670-5575.

However, I am concerned about the potential human health threat from benzene contamination in the soil, especially near the snack shop/cashier area. It is not known whether the benzene concentrations found in soil in that area are localized or whether they extend beneath the building. The concentrations that have been detected exceed acceptable human health based screening levels (Tier 1) for case closure at this time.

An appropriate next step toward case closure is to have a site specific (Tier 2) risk evaluation performed by a qualified consultant. The risk assessor needs to follow the procedures outlined in *ASTM E 1735 - 95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*. The risk evaluation would be used to determine whether the benzene levels remaining in place pose a significant human health risk given the site conditions, whether additional investigation or remediation is needed, and whether any use restrictions would be appropriate for the property.

Also pertinent to case closure is the exact location of a nearby stream and natural spring that have been described in past reports. Please provide a site diagram showing these features and an accurate scale indicating distances to the stream and spring.

You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Dick Pantages, Alameda County Environmental Health Services
Frank Hamedi-Fard, Soil Tech Engineering, 1761 Junction Av., San Jose CA 95112

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0# 125

February 19, 1997

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

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

STID 1130

Re: Investigations at 2740 98th Avenue, Oakland, California

Dear Mr. Ghofrani,

This office has reviewed Soil Tech Engineering, Inc's (Soil Tech) October 3, 1996 Subsurface Investigation Report and the December 26, 1996 Quarterly Groundwater Monitoring Report. In the October 3, 1996 report, Soil Tech theorizes that the Hayward fault may be influencing the groundwater gradient flow at the site due to observed discrepancies in groundwater elevations between the initial wells and the most recently installed wells, and the fact that Wells STMW-2 and STMW-3 are consistently "dry". However, it appears that the observed groundwater elevation discrepancies may be resulting from the fact that Wells STMW-1 through STMW-3 are screened at much shallower elevations than the recently installed wells, Wells STMW-4 through STMW-6 (please refer to attached cross section prepared by this office to get a better sense of the elevation difference). In looking at the groundwater elevations of Wells STMW-4 through STMW-6, it appears that the primary groundwater aquifer beneath the site exists at an elevation of roughly 70 to 75 feet. The groundwater identified in Well STMW-1 appears to be a perched aquifer, due to all the clay at the site, and Wells STMW-2 and STMW-3 appear to be "dry" because they are not screening through any perennial perched or alluvial aquifers.

The observed groundwater contaminant plume appears to be resulting from an older release due to the lack of MTBE in the groundwater. Additionally, due to the fact that groundwater was noted at much greater depths than the observed soil contamination in Wells STMW-4 through STMW-6, the source of the groundwater contamination identified in these wells appears to be upgradient from these wells, most likely from the former product piping trench or the underground storage tank area.

Due to the complex geological nature at this site, this office is requesting that you retain a professional Registered Geologist to assess the site, make interpretations, and review and sign-off on all future reports to this office.

Contrary to Soil Tech's proposal, this office will not be requesting that additional groundwater monitoring wells be installed at this time, however, quarterly groundwater monitoring is required to continue at the site to monitor fluctuating groundwater contaminant concentrations as well as

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
February 19, 1997
Page 2 of 2

variations in the groundwater flow directions. Groundwater contaminant concentrations may fluctuate due to leaching of the observed residual soil contamination at the site, and also due to vertical migration of what appears to be contaminated perched water (e.g., the shallow "grab" groundwater sample collected from Boring B-1 in March 1994). If contaminant concentrations consistently increase in the future, additional wells may be needed to properly characterize the severity and extent of this plume.

Future monitoring reports should include elevation contours (attached is an example of elevation contours for the most recent sampling event), using Wells STMW-4 through STMW-6 for the triangulation, since these wells appear to be most representative of the groundwater aquifer. Additionally, field notes containing information on the amount of purged water, pH, temperature, conductivity, turbidity, petroleum odors, etc. should be included. If these field notes exist for past sampling events, please submit copies of these notes to our office. Due to the fact that no VOCs or heavy metals have been identified in Well STMW-6 in the last two monitoring events, future groundwater samples collected from this well need not be analyzed for these constituents.

Lastly, the October 3, 1996 report referenced the existence of a local spring or artesian aquifer across 98th Avenue, at the base of the hill. Please provide this office with a figure showing the exact location of this spring and information on whether this spring is used for any purpose.

The next quarterly groundwater monitoring report is due to this office in May 1997. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

ATTACHMENTS

cc: Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Acting Chief

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20125

Alameda County
Environmental Health
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

July 10, 1996

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Ave.
Oakland, CA 94605

STID 1130

Re: Work plan for investigations at 2740 98th Avenue, Oakland, CA

Dear Mr. Ghofrani,

This office has reviewed the July 1, 1996 addendum to the November 3, 1995 work plan. The work plan, in conjunction with the addendum, is acceptable to this office. Field work should commence within 60 days of the date of this letter. A report documenting the work should be submitted to this office within 45 days after completing field activities. Please notify this office at least 48 hours in advance of implementing the work plan.

The next quarterly groundwater sampling event at the site should be conducted in conjunction with the proposed sampling of the new wells. The report documenting the results should include, but not be limited to, groundwater elevation contours (the new wells shall be surveyed to Mean Sea Level), cross sections, and technical discussions regarding the site's stratigraphy and whether a trace of the Hayward Fault crosses the site.

Additionally, this office is requesting that you incorporate the former locations of the piping trenches in the site plan and submit it to this office in the next report.

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

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#125

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX (510)337-9335

May 13, 1996

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

STID 1130

Re: Required investigations at 2740 98th Avenue, Oakland, California

Dear Mr. Ghofrani,

On June 13, 1995, this office sent you a letter requesting the submittal of technical discussions explaining the discrepancies between the groundwater elevations observed in the on-site monitoring wells. Additionally, based on the elevated levels of soil and groundwater contamination identified in Boring B-1 in March 1994 (Up to 1,500 ppm TPHg and 2.4ppm benzene in soil and 990,000 ppb TPHg and 11,000ppb benzene in groundwater), this office requested that a monitoring well be placed east of the former tank pit in order to delineate and monitor the extent of this contamination. Although Well W-4, a production well, is located approximately 40 feet east of Boring B-1, the screened interval for this well is unknown and therefore samples collected from this well are questionable and may not be reflective of actual groundwater conditions.

In November 1995, Soil Tech Engineers (Soil Tech) submitted a work plan in response to the County's June 13, 1995 letter. Soil Tech proposed the installation of three additional monitoring wells, however, they did not provide sufficient, technically-based, rationale as to how and why these three additional wells would address the County's above concerns.

On December 5, 1995, the County sent you a letter requesting an addendum to Soil Tech's November 1995 work plan. The letter requested that the addendum include the following:

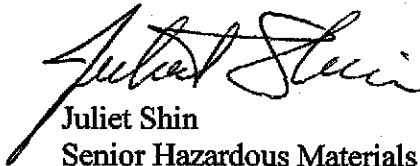
- o Technical discussions and research into the discrepancies in groundwater elevations between the on-site wells;
- o Technical discussions on the possibility of interference from the Hayward fault on groundwater flow;
- o Justification for the three proposed monitoring wells;
- o The submittal of the Northwest Envirocon report, dated July 22, 1992; and
- o Although this office supports the need for replacing Well W-4, more careful examination was requested for determining the proper screened interval for the proposed replacement well.

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
May 13, 1996
Page 2 of 2

To date, you have responded to only one of the above requests, which was the submittal of the Northwest Envirocon report. This office is requesting that you address the remaining above items in an addendum. The technical geological/hydrogeological discussions should be addressed by an experienced Professional Registered Geologist. The addendum should be submitted to this office within 60 days of the date of this letter.

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

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Cheryl Gordon
SWRCB
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund Prog.
P.O. Box 944212
Sacramento, CA 94244-2120

Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0125

RAFAT A. SHAHID, Assistant Agency Director

Alameda County CC4580
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

December 5, 1995

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Ave.
Oakland, CA 94605

STID 1130

Re: Work plan for investigations at 2740 98th Avenue, Oakland, California

Dear Mr. Ghofrani,

This office has reviewed Soil Tech Engineering, Inc.'s (Soil Tech) Work Plan for Additional Site Assessment, dated November 3, 1995. This work plan was prepared in response to the County's June 13, 1995 letter which required that two primary issues be addressed: 1) the lateral delineation of soil contamination; and 2) greater studies into the discrepancy between the Depth-to-Water (DTW) in the on-site wells and the potential for the Hayward Fault's influence on groundwater flow at the site. Soil Tech's work plan proposes to install three additional monitoring wells, however, not enough rationale was provided in the work plan to explain how and why these wells would address the above concerns. Monitoring wells are not necessary for the lateral delineation of the observed soil contamination, and it is unclear as to how the monitoring of these additional wells would answer the above concerns.

An addendum to this work plan providing more detailed rationale for the installation of three additional monitoring wells, or another proposal addressing the above concerns, should be submitted to this office. The information provided in this addendum should include more detailed geological information, such as cross sections, the potential for confined conditions, and whether the current wells are screening accurately.

This office does not have a copy of Northwest Envirocon, Inc.'s Report, dated July 22, 1992, documenting preliminary investigations at the site. Please submit a copy to this office along with the addendum. We are hoping that this report addresses whether any sampling was conducted in relation to the waste oil release in May 1989, because our case files currently have no sampling information from this event. Please submit all the sampling information you have from this incident. If it is determined, after our review of this information, that sampling for waste oil constituents was incomplete in 1989, this office may require the next round of groundwater and/or soil samples to be analyzed for waste oil constituents, in addition to TPHg and BTEX.

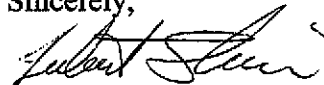
Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
December 5, 1995
Page 2 of 2

Lastly, Soil Tech has proposed to destroy Well W-4/MW-4, and replace it with another well. However, since Well W-4 is the only on-site well that has identified contaminants to date, the replacement well should, if possible, be drilled to the same depth as Well W-4, and screened at the same interval. Although no construction information is currently available for Well W-4, it may be possible to glean that information during the removal/destruction of Well W-4. Please include this concern in the requested addendum.


Please be reminded to have someone at the Cleanup Fund Program pre-approve all your work plans. This way, you will know what is acceptable to the Cleanup Fund for reimbursement before implementing the work plans. If you have any questions regarding the pre-approval process by the Cleanup Fund, you can contact Christopher Stevens at (916) 227-4519 or Jim Munch at (916) 227-4430.

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

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc:  Cheryl Gordon
SWRCB
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund Prog.
P.O. Box 944212
Sacramento, CA 94244-2120

Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0125

RAFAT A. SHAHID, Assistant Agency Director

June 13, 1995

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Ave.
Oakland, CA 94605

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

STID 1130

Re: Investigations at 2740 98th Ave., Oakland, California

Dear Mr. Ghofrani,

This office has reviewed Soil Tech Engineering's (Soil Tech) Environmental Site Assessment Report, dated March 8, 1995. A great discrepancy was identified between the water level measurements collected from the three new monitoring wells, STMW-1 through STMW-3, and the production well, W-4. As proposed by Soil Tech, additional hydrogeologic investigations need to be conducted to identify the reasons behind the water depth discrepancy and to confirm the groundwater gradient direction at the site.

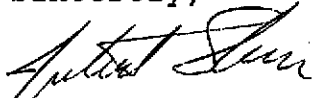
According to the ground water elevation information collected from the on-site wells, it appears that ground water gradient is flowing to the east. This gradient direction appears to be consistent with the elevated levels of soil and ground water contamination identified to the east of the tank pit from boring B-1 in March 1994 (Up to 1,500 ppm TPHg and 2.4 ppm benzene in soil and 990,000 ppb TPHg and 11,000 ppb benzene in ground water). Based on the estimated ground water gradient, the soil and ground water contamination identified in boring B-1, and the sheen identified in production well W-4, located to the east of boring B-1, you are required to conduct further investigations to the east of the tank cluster and pump islands to further delineate this contamination.

Per Article 11, Title 23 California Code of Regulations, you are required to submit a work plan, within 60 days of the date of this letter, addressing the above concerns. Additionally, per Article 5, Title 23 California Code of Regulations, quarterly ground water monitoring, gradient determinations, and reporting shall continue at the site.

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

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
June 13, 1995
Page 2 of 2

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0125

RAFAT A. SHAHID, Assistant Agency Director

January 10, 1995

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Ave.
Oakland, CA 94605

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

STID 1130

Re: Work plan for investigations at 2740 98th Ave., Oakland,
California

Dear Mr. Ghofrani,

This office has reviewed Soil Tech Engineering's (Soil Tech) work plan, dated December 5, 1994, for the above site. This work plan is acceptable to this office with the following conditions/reminders:

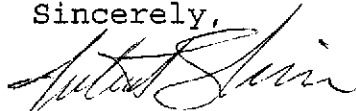
- o A minimum of one soil sample from each boring shall be taken to a certified laboratory for analysis. Field screening shall be conducted to help select which samples shall be analyzed at a laboratory.
- o Wells should be screened five feet above and 10 feet below the water table to account for seasonal fluctuations.
- o The monitoring wells must be placed at least 20 feet apart from one another and form sufficient triangulation for accurate ground water gradient determinations.
- o Per Article 5 Title 23 California Code of Regulations, quarterly ground water monitoring and reporting shall be conducted.
- o Lastly, please submit information on the fate of the previously excavated soil. If this soil is still stockpiled at the site, it must be adequately covered to prevent infiltration of surface runoff water. Additionally, you must submit information on your intentions for this soil. If you intend on aerating this soil, you should notify the Bay Area Air Quality Management District and our office. If you intend on hauling this soil off site for disposal, or wish to request reuse of this soil on site, you need to contact this office.

Field work shall commence within 60 days of the date of this letter. A report documenting the work shall be submitted to this office within 45 days after completing field activities.

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
January 10, 1995
Page 2 of 2

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

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Frank Hamedi
Soil Tech Engineering
298 Brokaw Road
Santa Clara, CA 95050

Cheryl Gordon
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120

Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0125

RAFAT A. SHAHID, Assistant Agency Director

October 27, 1994

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Ave.
Oakland, CA 94605

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

STID 1130

Re: Requirements for the State Trust Fund commitment letter
for site located at 2740 98th Ave., Oakland, California

Dear Mr. Ghofrani,

Based on a financial review of your State Trust Fund claim by the State Board, you are eligible to receive a "Letter of Commitment" for this fund. **However**, during the State's recent file review, the State determined that you are not currently in compliance with the requirements for investigations and cleanup at your site.

On July 8 and August 10, 1994, this office sent you letters requiring you to submit a Preliminary Site Assessment work plan, documentation for the fate of excavated soil, and information on the former oil spill at the site.

To this date, this office has not received any of the above documents. You are required to submit the Preliminary Site Assessment work plan, along with the other requested information, to this office within 90 days of the date of this letter, or by **January 19, 1995**. **If the work plan is not bid, contracted for, and prepared within the given timeframe, the State Board cannot provide you with a "Letter of Commitment" for funding.** Additionally, if you do not submit the work plan by the given due date, steps will have to be taken to remove your claim from the underground storage tank cleanup fund priority list.

On June 18, 1993, soil samples collected from beneath the piping identified up to 2,900 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg). Further investigations conducted in March 1994 identified up to 1,500 ppm TPHg in soil samples and 990,000 parts per billion (ppb) in ground water samples.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
October 27, 1994
Page 2 of 3

The required Preliminary Site Assessment (PSA) shall address the delineation of the lateral and vertical extent and severity of soil and ground water contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination in the tank pit, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.
- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for the appropriate fuel contaminants listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

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

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
October 27, 1994
Page 3 of 3

Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after completing field work. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

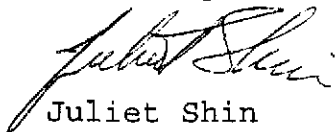
The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions.
- o Status of ground water contamination characterization
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c) (d) of Title 23 California Code of Regulations.**

If you have any questions or comments, please contact me at (510) 567-6700.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

ATTACHMENT

cc: Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0125

RAFAT A. SHAHID, Assistant Agency Director

August 10, 1994

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Ave.
Oakland, CA 94605

Alameda County CC 4580
Health Care Services Agency
Dept. Of Environmental Health
1131 Harbor Bay Pkwy 2nd Flr.
Alameda, CA 94502-6577

STID 1130

Re: Investigations at 2740 98th Ave., Oakland, CA

Dear Mr. Ghofrani,

On July 8, 1994, this office sent you a letter requiring you to submit documentation showing the fate of excavated soil, and additional information regarding the waste oil release at the site in 1989, by July 25, 1994. To this date, this office has not received this information. You are required to submit this information within 20 days of the date of this letter, or by August 30, 1994.

Additionally, please be reminded that, per the County's July 8, 1994 letter, you are required to have the Preliminary Site Assessment work plan submitted to this office by September 2, 1994. Any requests for extensions of the due dates, or modifications of the required tasks, must be submitted in writing.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Donna Turlotte
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0125

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

July 8, 1994

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

STID 1130

Re: Required investigations at 2740 98th Avenue, Oakland, CA

Dear Mr. Ghofrani,

This office has received and reviewed Soil Tech Engineering's Preliminary Site Assessment Report, dated April 21, 1994. Total Petroleum Hydrocarbons as gasoline (TPHg) at 1,500 parts per million (ppm) was identified at 9 feet below ground surface (bgs) and 220 ppm TPHg was identified at 15 feet bgs from Boring 1. Additionally, **very elevated** levels of ground water contamination, at 990,000 parts per billion (ppb) TPHg and 11,000 ppb benzene were identified in the ground water sample collected from Boring 1.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of **both soil and ground water** contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one permanent ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
July 8, 1994
Page 2 of 4

required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for TPHg and BTEX. Additionally, due to the waste oil tank release in 1989, ground water samples collected from near the waste oil tank must be analyzed for all the waste oil tank constituents listed in Table 2, RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

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

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

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
July 8, 1994
Page 3 of 4

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c)(d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

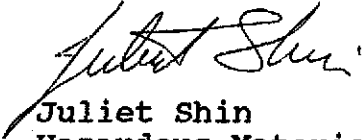
Please provide more information on the waste oil tank leak in 1989. Did this leak occur from the current waste oil tank? How much oil was noted to have leaked? Please submit all information on this leak **within 15 days** of the date of this letter.

Lastly, you are required to submit documentation for the fate of excavated soil during the product piping sampling and overexcavation. **This documentation must be submitted within 15 days** of the date of this letter.

If you have any questions or comments, please contact me at (510) 337-9331.

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
July 8, 1994
Page 4 of 4

Sincerely,



Juliet Shin
Hazardous Materials Specialist

ATTACHMENT

cc: Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Donna Turlotte
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0125

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

December 30, 1993

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

STID 1130

Re: Work plan for investigations at 2740 98th Avenue, Oakland,
California

Dear Mr. Ghofrani,

This office reviewed Soil Tech Engineering's work plan, dated December 15, 1993. This work plan is acceptable with the following requirements/reminders:

- o A minimum of two soil samples from each boring must be analyzed at a certified laboratory;
- o In addition to analyzing the ground water sample for Total Petroleum Hydrocarbons as gasoline and benzene, toluene, ethylbenzene, and xylenes, you are required to analyzed the water sample for lead.

Lastly, you are required to complete the attached Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report and submit it to this office within 15 days of the date of this letter.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0125

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

December 8, 1993

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

STID 1130

Re: Investigations at 2740 98th Avenue, Oakland, California

Dear Mr. Ghofrani,

On October 5, 1993, this office sent you a letter requiring you to submit a work plan addressing soil and ground water investigations at the above site. You were required to submit this work plan by November 19, 1993. To this date, this office has received no work plan and no correspondence as to the reason why you are delinquent in your submittal of this plan.

You are required to submit the required work plan within 30 days of the date of this letter. This is a formal request for a technical report pursuant to **Section 2722 (c), Article 11, Title 23 California Code of Regulations.**

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: David C. Lambert
Northwest Environ
1800 Tribute Rd., Ste 101
Sacramento, CA 95815

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0125

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

October 5, 1993

Mr. Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

STID 1130

Re: Investigations at 2740 98th Avenue, Oakland, California

Dear Mr. Ghofrani,

This office has received the letter from Northwest Envirocon, Inc., dated September 24, 1993. Based on the new piece of information, regarding the depths of the former soil sample locations, it is acceptable to this office to conduct soil borings beneath the contaminated areas and to collect a grab ground water sample(s) to determine whether the ground water has been impacted.

As stated in the letter, you are required to submit a work plan to this office, detailing the proposed work, for our approval. A work plan must be submitted **within 45 days** of the date of this letter.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read "Juliet Shin".

Juliet Shin
Hazardous Materials Specialist

cc: David C. Lambert
Northwest Envirocon
1800 Tribute Rd., Ste 101
Sacramento, CA 95815

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO125

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 1, 1993

Kiyoumars Ghofrani
Freeway Station & Service
2740 98th Avenue
Oakland, CA 94605

STID 1130

Re: Required investigations at Freeway ARCO Station, located at
2740 98th Ave., Oakland, California

Dear Mr. Ghofrani,

On June 18, 1993, fiberglass piping was removed from the above site. At that time, stained soils and petroleum odors were noted. Eight soil samples were collected from beneath this piping at 12 to 13 feet below ground surface. Analysis of these soil samples identified Total Petroleum Hydrocarbons as gasoline in five of these samples at concentrations ranging from 310 parts per million (ppm) to 2,900 ppm.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of soil and ground water contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
September 1, 1993
Page 2 of 3

installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be **surveyed to an established benchmark**, with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be **collected monthly for the first three months**, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for the appropriate fuel contaminants listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

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

The PSA proposal is due **within 60 days** of the receipt of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time; records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all

Mr. Kiyoumars Ghofrani
Re: 2740 98th Ave.
September 1, 1993
Page 3 of 3

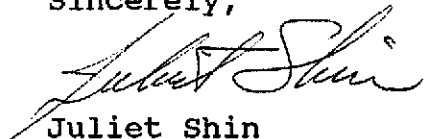
samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.

- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c)(d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Jan Rutenbergs
Northwest Envirocon
1800 Tribute Rd., Ste 101
Sacramento, CA 95815

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0125

RAFAT A. SHAHID, Assistant Agency Director

July 20, 1993

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

Mr. Kiyoumars Ghofrani
Freeway Station and Service
2740 98th Avenue
Oakland, CA 94605

Re: Underground Tank Modification

Dear Mr. Ghofrani:

I have received your letter dated July 19, 1993 regarding the work plan for the soil contamination investigation and remediation to be done at your Freeway Station and Service facility at 2740 98th Avenue in Oakland by soil Tech Engineering, Inc. It is acceptable. E & G Construction can now proceed with the completion of the underground tank modification work as planned. They will need to call me out for a final inspection when the work is completed. The work plan submitted will be turned over to Hazardous Materials Specialist Eva Chu of our Local Oversight Program for review and approval.

If you have any questions, please contact me at 271-4320.

Sincerely,

Ronald J. Owcarz, REHS
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB
Brian Oliva
Eva Chu

SFO

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0125

Certified Mail # P 833 981 403

May 11, 1989

Mr. Kiyoumars Ghofrani
Freeway Arco
2740 - 98th Ave.
Oakland, CA 94605

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

RE: Notice of Violation

Dear Mr. Ghofrani:

An inspection of your facility was conducted by Hazardous Materials Specialist, Ariu Levi of this office on April 28, 1989. This inspection was to evaluate your degree of compliance with California Hazardous Waste Control Laws.

Several violations were found that will require clean up and /or corrective action. The following describes the deficiencies or violations that will require the submittal of a plan of correction and remedial action:

California Code of Regulations, Title 23 (CCR23), Section 2641, requires the implementation of one of seven approved monitoring systems for existing underground tanks. When questioned concerning the method in use for the product fuel tanks, and the waste oil tank, you indicated no method was in use and that your facility was not yet in compliance. Also, a review of this office's records on your facility found that an inspection on 7/1/86 informed you that no leak detection system was on your tanks.

CCR23, Section 2651 & 2652, requires that unauthorized releases from underground tanks be properly reported. Your facility experienced a release of unknown quantity from the waste oil tank and failed to report the release or conduct clean up. The quantity lost was great enough to drain into exposed soil, leach into a collection pipe that emptied onto Stanley Street, drain onto exposed soil, and run down slope for approximately 150 feet. A composite sample from three points in the affected area was taken for TOG analysis and quantification.

You are informed that:

California Health and Safety Code, Section 25250.4, states, Used oil regulated by the Department shall be managed as a hazardous waste.

California Health and Safety Code, Section 25250.5, states, Disposal of used oil by discharge to sewers, drainage systems, surface or groundwater, watercourses; or deposit on land, is prohibited

Freeway Arco
May 11, 1989
Page 2 of 2

California Health and Safety Code, Section 25189, states, Any person who negligently disposes or causes the disposal of any hazardous or extremely hazardous waste at a point which is not authorized according to the provisions of this chapter shall be subject to a civil penalty of not more than twenty five thousand dollars (\$25,000) for each violation..

CCR, title 22, Section 66328 (d), states, If corrections are needed, the operator shall provide the Department with a written plan of correction which states the action to be taken and the expected dates of completion.

Your plan of correction must include, but is not limited to, the following:

1. Steps taken to comply with CCR, Title 23 monitoring requirements.
2. Determine quantity of lost waste.
3. Site assessment to determine extent of soil contamination and the possibility of ground water contamination.
4. Names of contractors involved in site assessment, and clean up. Provide Contractor license types, and professional qualifications
5. Method of clean up.
6. End destination of contaminated soils and other hazardous waste.
7. Criteria used to determine "clean".
8. Steps taken to prevent the problem from reoccurring.

You are requested to respond to the contents of this letter within fifteen (15) days from the above letter date. If you have any questions concerning the content of this letter, or the status of this case please contact Hazardous Materials Specialist, Ariu Levi. Mr. Levi can be reached at 271-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Program

RAS:al

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection

Lisa McCann, RWQCB

Alan Whitman, OPD

Howard Hatayama, DOHS

Ariu Levi, Alameda County Hazardous Materials
Files