

2740 98th Avenue
Oakland, CA 94605

*Freeway
Station & Service*

(510) 562-4505

December 23, 1993

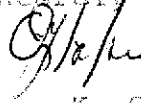
To : Alameda County
Hazardous Materials
80 Swan Way
Oakland Ca . 94621

Ref Date 12 / 3 / 93

Dear Ms Juliet Shan,

In response to your letter and for your approval or any further action, Soil Tech Engineering prepared a work plan which is enclosed for Freeway Service Station Preliminary site assessment.

Sincerely,



K. Ghofrani

ALCO
HAZMAT
93 DEC 28 PM 2:14

File No. 7-93-556-SI

PROPOSED WORK PLAN FOR
PRELIMINARY SITE ASSESSMENT
FOR FREEWAY SERVICE STATION
LOCATED AT 2740 98TH AVENUE
OAKLAND, CALIFORNIA
DECEMBER 15, 1993

PREPARED FOR:
MR. KIYUMARS GHOFrani
FREEWAY STATION AND SERVICE
2740 98TH AVENUE
OAKLAND, CALIFORNIA 94605

BY:
SOIL TECH ENGINEERING, INC.
298 BROKAW ROAD
SANTA CLARA, CALIFORNIA 95050

SOIL TECH ENGINEERING, INC.

LIST OF FIGURES

- FIGURE 1 ... SITE VICINITY MAP SHOWING 2740 98TH AVENUE, OAKLAND, CALIFORNIA.
- FIGURE 2 ... SITE PLAN SHOWING LOCATIONS OF TANK AREA, TRENCHES, FUEL ISLAND AND BUILDING.

LIST OF APPENDICES

- APPENDIX "A" ... FIGURE 1 AND FIGURE 2.
- APPENDIX "B" ... DRILLING AND SOIL SAMPLING PROCEDURE.
- APPENDIX "C" ... HEALTH AND SAFETY PLAN.
- APPENDIX "D" ... OUTLINE OF DRUM HANDLING PROCEDURES.
- APPENDIX "E" ... TRACE ANALYSIS LABORATORY, INC. ANALYTICAL REPORTS.
- APPENDIX "F" ... ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH'S HAZARDOUS MATERIALS INSPECTION FORMS AND LETTER.

TABLE OF CONTENTS

Page No.

LETTER OF TRANSMITTAL	1-2
INTRODUCTION	
PURPOSE OF INVESTIGATION	1
SCOPE OF SERVICES	1-2
SITE LOCATION	2
SITE HISTORY	2-4
PURPOSED SOIL AND GROUNDWATER INVESTIGATION	4-5
SOIL SAMPLING	5-6
WATER SAMPLING	6-7

RESULTS

LABORATORY ANALYSIS	7-8
SITE SAFETY PLAN	8
REPORT PREPARATION	8
SCHEDULE	9

APPENDIX "A"

FIGURE 1 - SITE VICINITY MAP	M1
FIGURE 2 - SITE PLAN	M2

APPENDIX "B"

DRILLING AND SOIL SAMPLING PROCEDURE	SOP1-SOP2
---------------------------------------------	-----------

File No. 7-93-556-SI

TABLE OF CONTENTS CONT'D

Page No.

APPENDIX "C"

HEALTH AND SAFETY PLAN

HSP1-HSP9

APPENDIX "D"

OUTLINE OF DRUM HANDLING PROCEDURES

ODH1-ODH5

APPENDIX "E"

TRACE ANALYSIS LABORATORY, INC. ANALYTICAL REPORTS

APPENDIX "F"

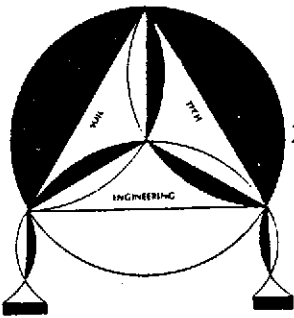
ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH'S
HAZARDOUS MATERIALS INSPECTION FORM

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH'S LETTERS

SOIL TECH ENGINEERING

Soil, Foundation and Geological Engineers

298 BROKAW ROAD, SANTA CLARA, CA 95050 ■ (408) 496-0265 OR (408) 496-0266



December 15, 1993

File No. 7-93-556-SI

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

Regarding: Proposed Work Plan for the Subject Site
Located at 2740 98th Avenue, in
Oakland, California

Dear Mr. Ghofrani:

We have prepared the enclosed work plan as requested by Alameda County Health Care Services Agency (ACHCSA) in the letter dated September 1 and October 5, 1993. This work plan must be submitted to the ACHCSA for approval and their comments.

The proposed work plan includes drilling 4 exploratory borings and collecting grab water samples for laboratory analysis and preparation of a technical report.

Upon approval of this work plan by the above mentioned agency, STE will initiate the activities, and a summary report will be prepared pending receipt of laboratory analysis results.

File No. 7-93-556-SI

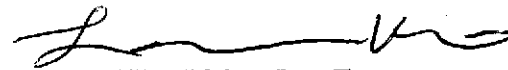
If you have any questions or require additional information,
please feel free to contact our office at your convenience.

Sincerely,

SOIL TECH ENGINEERING, INC.



FRANK HAMEDI-FARD
GENERAL MANAGER



LAWRENCE KOO, P. E.
C. E. #34928

SOIL TECH ENGINEERING, INC.

2

PROPOSED WORK PLAN
FOR PRELIMINARY SITE ASSESSMENT
FOR FREEWAY SERVICE STATION
LOCATED AT 2740 98TH AVENUE
OAKLAND, CALIFORNIA
DECEMBER 15, 1993

INTRODUCTION:

PURPOSE OF INVESTIGATION:

This work plan outlines actions to be taken in a soil and groundwater preliminary investigation for site characterization at the Freeway Service Station, located at 2740 98th Avenue, in Oakland, California. The work plan addresses Alameda County Health Department UST Local Oversight Program request letter dated September 1, 1993 and revised letter dated October 5, 1993 Recommendations for Initial Evaluation and Investigation of Contaminated Site.

The investigation of this site is prompted by inadvertent unauthorized release from an underground storage tank (UST) system. The source of release was detected beneath the product line during pipeline replacement by E&G Construction Company.

SCOPE OF SERVICES:

The work plan described herein includes the following scope of services:

- Soil investigation (4 borings).
- A grab groundwater sampling from the boring.
- Groundwater investigation (1 monitoring well).
- Preliminary site assessment report.

The groundwater portion of the proposed investigation will be pursued only if dissolved petroleum hydrocarbons are detected in the water.

SITE LOCATION:

The site is on the southeasterly corner of 98th Avenue and Stanley Avenue, which bound the property on the north and east in the City of Oakland. On the south, the site is bordered by homes and business establishments; the surrounding area has similar types of use. The subject site consist of approximately 2,000 square feet. The structure is set on approximately 9,000 square feet paved parcel.

SITE HISTORY:

There are four underground storage tanks located on the subject property. Based on information from Phase I environmental

site assessment dated June 22, 1992, by Northwest Envirocon, Inc., there are two 10,000 gallon tanks and one 5,000 gallon tank used for the storage of gasoline, and one 500 gallon tank used for the storage of waste oils. Based on the same report, the three gasoline storage tanks were installed in July of 1975 and are constructed of fiberglass. The waste oil tank is constructed of metal. An installation date for this tank could not be confirmed. These tanks are tested yearly for tightness by American River Testing of Sacramento. Tightness refers to a precision test which determines the integrity of the tank. This test is required annually by the State of California.

In May of 1989, there was a release of an unknown quantity of waste oil during removal by Evergreen. The oil drained into exposed soil, leached onto/into a collection pipe that emptied onto Stanley Avenue and drained down Stanley Avenue approximately fifty feet. In response to this spill, the following actions were taken: The waste oil was removed by U. S. Waste Oil Group, and three top soil samples were sent to Brown and Caldwell Laboratories for Total Oil and Grease (TOG) analysis. No further remediation was performed for this spill.

A phase I Environmental Site Assessment for the subject site was conducted by Northwest Envirocon, Inc. of Sacramento. The detail of the site assessment is described in a report, dated July 22, 1992, prepared by Northwest Envirocon, Inc.

In June 18, 1993, E&G Construction removed the product pipeline and conducted a soil sampling in the pipeline trenches. Eight soil samples were collected from the depth of approximately 3.5 feet below grade, under the supervision of Alameda County Health Department Inspector, Mr. Ron Owcarz. Five of the shallow soil samples detected elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) ranging from 310 milligrams per kilogram (mg/Kg) to a maximum of 2,900 mg/Kg. E&G Construction then ~~excavated additional soil from three locations (1, 4 & 5) where TPHg levels were~~ ^{1,900} ~~550, 1,900, and 2,900 mg/Kg, respectively,~~ to a depth of approximately 12 to 13 feet below grade. ~~Three confirmed soil samples (A-1, B-1 and C-1) were collected on July 1 and 27, 1993.~~ Two of the three soil samples detected no TPHg, and ~~one sample TPHg level was~~ ^{55 mg/Kg.} The lateral extent of TPHg or impact to groundwater was not evaluated at that time.

Alameda County Health Department requested a preliminary site assessment in a letter, dated September 1, 1993. However in a letter dated October 5, 1993, the Department agreed to conduct 4 exploratory soil borings in the vicinity of the contaminated areas and collect one grab water sample to assess whether the groundwater has been impacted.

PROPOSED SOIL AND GROUNDWATER INVESTIGATION:

The main objectives of the proposed soil investigation are to evaluate the lateral and vertical extent of the dissolved hydrocarbons beneath site. Based on your request, we are proposing to

drill four exploratory soil borings in the vicinity of the contaminated areas as detected by the E&G Construction Company. All four borings will be drilled to the depth of water table. One of the borings will be extended to groundwater where one insitu groundwater sample will be sample will be collected.

The methods and procedures for drilling, and soil sampling will be in accordance with State Tri-Regional Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated August 1990, and STE's Standard Operation Procedures (SOP) are included in the Appendix "B".

SOIL SAMPLING:

Soil samples will be taken during exploratory soil drilling operations. The procedures to be used are as follows:

- Soil samples will be taken at a minimum of 5-foot intervals in the unsaturated zone, at changes in lithology, and through areas of obvious contamination in order to develop a profile of soil impact.
- Soil samples will be collected using a California split-spoon drive sampler lined with 2-inch or 2.5-inch diameter brass tube liners which are 4 or 6 inches long. Care will be taken to assure that no headspace is present in the liner. All soil sampling equipment will be cleared with a non-phosphate detergent (Alconox) and water between each use to prevent potential cross-contamination of soil samples.

- Immediately after a sample is collected, each end of the brass liner that contains the soil sample will be covered with aluminum foil, capped with a polyethylene lid, sealed with duct tape, and labeled. Soil samples will be individually placed in zip-lock bags and immediately refrigerated in an ice chest containing frozen blue ice. The samples will be maintained in a refrigerated condition until they are delivered to a laboratory certified by the California Department of Health Services (DHS) to perform the specified analyses. Chain-of-custody documentation will be maintained from the sampling location to the laboratory. The chain-of-custody will be signed by the sampler and placed in the container holding the samples. A custody seal will be placed on the container. Condition of the samples and custody seal will be noted on the chain-of-custody document by the laboratory.
- Brass sample liners will be cleaned through a laboratory dishwasher, using a detergent prior to use. Contaminated brass liners will not be reused.
- Soil cuttings generated during drilling and sampling will be stored in 55-gallon drums. The drums will be labeled accordingly to ensure appropriate disposal.

WATER SAMPLING:

- Grab water sample will be taken from one of the boring to assess whether the groundwater has been impacted. The presence of absence of any floating product will also be assessed.

- After sampling, the water sample will be properly labeled, showing the sample number, boring number, date, time, sampler's name and preservation. The sample will be refrigerated in a cooler containing blue ice until delivery to a laboratory certified by the DHS to perform the specified analyses. Chain-of-custody documentation will be maintained from the sampling location to the laboratory. The chain-of-custody will be signed by the sampler and placed in the container holding the sample. A custody seal will be placed on the container. Condition of the samples and custody seal will be noted on the chain-of-custody document by the laboratory.
- Prior to sampling, all sampling equipment (bailers) will be decontaminated by washing in Alconox detergent and rinsing in both tap and deionized water.
- At least one travel blank will be placed in the cooler containing the groundwater samples for quality control purposes.

RESULTS:

LABORATORY ANALYSIS:

The soil and groundwater samples will be analyzed by a DHS-approved analytical laboratory. Laboratory methods and detection limits will be consistent with those recommended in Table 2 of the Tri-Regional Board's Recommendations (August 10, 1990).

Soil and groundwater samples will be analyzed by the following methods:

1. EPA 8015 for TPHg (low boiling point petroleum hydrocarbons).
2. EPA 8020 for BTEX.

SITE SAFETY PLAN:

A site safety plan has been prepared and will be available on site at the time field work is conducted. The site safety plan is attached in Appendix "C".

REPORT PREPARATION:

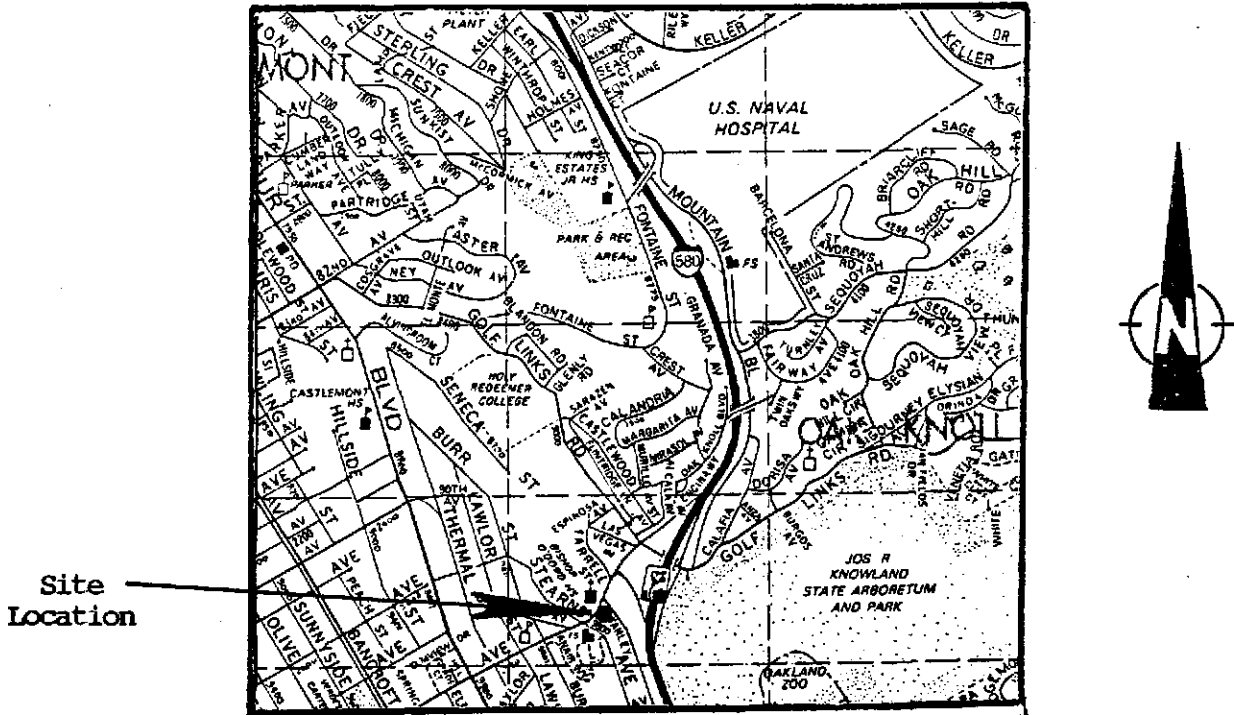
STE will prepare a report documenting the results of the field investigation. The report will include an analysis of data collected and conclusions pertaining to the following items:

- The character of the shallow hydrogeology beneath the site.
- The presence of any free product.
- The lateral extent of petroleum hydrocarbons in soil and groundwater.
- Recommendations for additional work, if needed.
- Conclusions on the need for remediation of soil and/or groundwater.

File No. 7-93-556-SI

SCHEDULE:

December 1993:	Submit work plan and well permit.
January 1994:	Drilling.
January 1994:	Sampling and analysis of soil and water.
February 1994:	Report preparation and submittal.



Thomas Brothers Map 1993 Edition
San Francisco, Alameda
and Contra Costa Counties

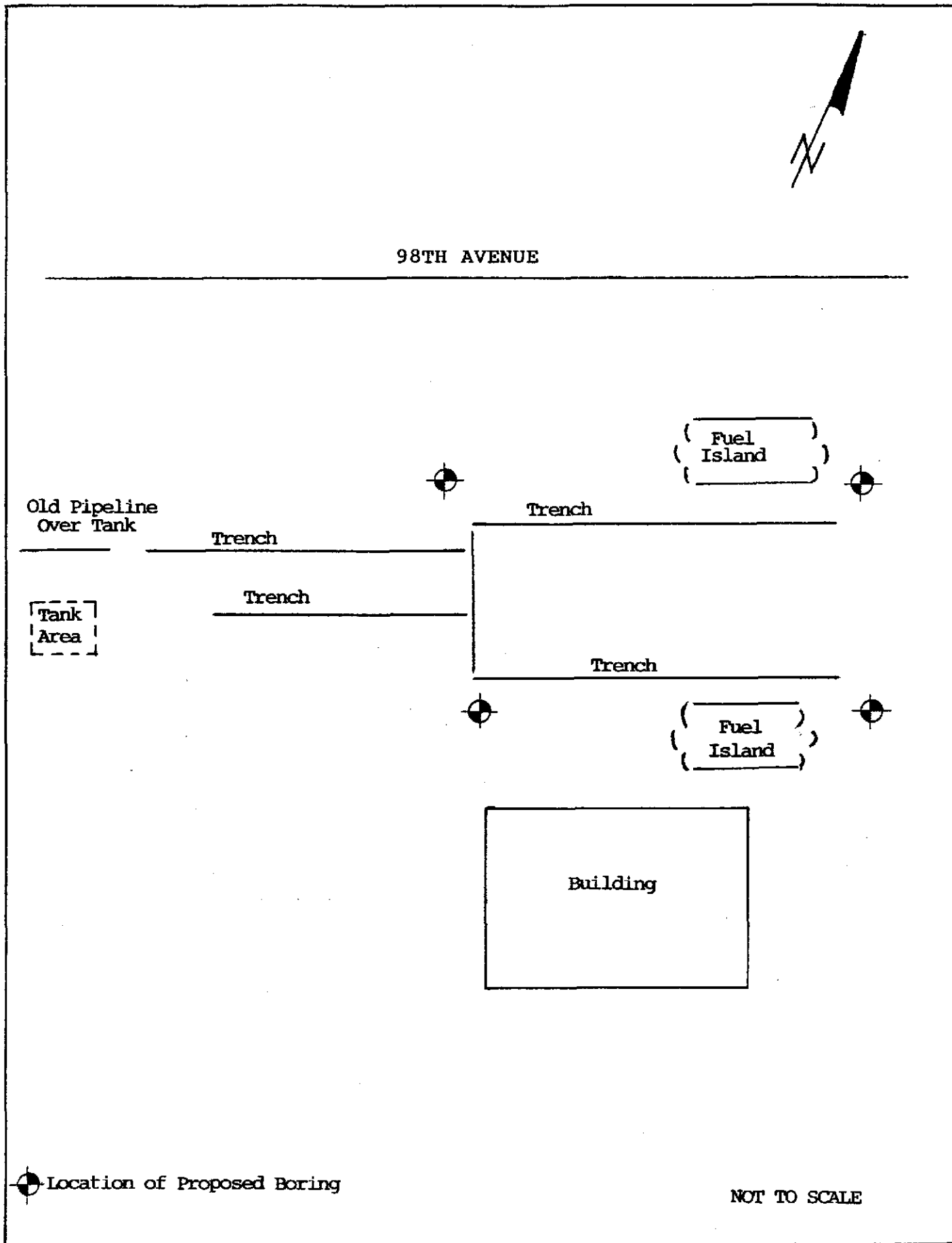


Figure 2

DRILLING AND SOIL SAMPLING PROCEDURE

A truck-mounted drill rig, using a continuous, solid-flight, hollow stem auger will be used in drilling soil borings to the desired depths.

Prior to drilling, all drilling equipment (i.e. auger, pin, and drilling head) will be thoroughly steam-cleaned to minimize the possibility of cross-contamination and/or vertical migration of possible contaminants.

In addition, prior to obtaining each individual soil sample, all sampling tools, including the split-spoon sampler and brass liners will be thoroughly washed in a Tri-Sodium Phosphate (TSP) solution followed by a rinse in distilled water.

During the drilling operation, relatively undisturbed soil samples will be taken from the required depth by forcing a 2-inch I.D., split-spoon sampler insert with a brass liner into the ground by means of a 140-lb. hammer, falling 30-inches or by hydraulic forces, at various depths.

The samplers will contain relatively undisturbed soil. In general, the first section of soil from the sampler (shoe) will be used in the field for lithologic inspection and evidence of contamination. The selected brass liner will be immediately trimmed, and the ends of the brass liner will be covered tightly

with aluminum foil and plastic caps, sealed with tape, labeled, placed in a plastic bag and store in an ice chest on blue ice in order to minimize the escape of any volatiles present in the samples. Soil samples for analysis are subsequently sent to a State Certified Hazardous Waste Laboratory accompanied by a chain-of-custody record.

Soil samples collected at each sampling interval will be inspected for possible contamination (odor or peculiar colors). Soil vapor concentrations are measured in the field by using Photoionization Detector (PID), PhotoVac-Tip Air Analyzer. The purpose of this field analysis is to qualitatively determine the presence or absence of hydrocarbons and to establish which soil samples will be analyzed at the laboratory. The soil sample is sealed in a zip-lock plastic bag and placed in the sun to enhance volatilization of the hydrocarbons from the sample. The data is recorded on the drilling log at the depth corresponding to the sampling point.

Other soil samples may be collected to document the stratigraphy and estimate relative permeability of the subsurface materials.

Soil tailings obtained during drilling will be stored on-site in steel drums, pending the analytical test results, for proper disposal.

HEALTH AND SAFETY PLAN
FOR THE PROPERTY
LOCATED AT 2740 98TH AVENUE
OAKLAND, CALIFORNIA

General:

This Health and Safety Plan (HSP) contains the minimum requirements for the subject site field work. The field activities include drilling, soil sampling and water sampling. All personnel and contractors will be required to strictly adhere with this HSP requirements.

The objective of the HSP plan is to describe procedures and actions to protect the worker, as well as unauthorized person, from inhalation and ingestion of, and direct skin contact with potentially hazardous materials that may be encountered at the site. The plan describes (1) personnel responsibilities and (2) protective equipment to be used as deemed when working on the site. At a minimum, all personnel working at the site must read and understand the requirements of this HSP. A copy of this HSP will be on-site, easily accessible to all staff and government field representative.

Hazard Assessment:

The major contaminants expected to be encountered on the project are gasoline and its hydrocarbon constituents. The

anticipated contaminants and their exposure standards are listed in Table 1. It is not anticipated that the potential levels of exposure will reach the permissible exposure limits (PEL) or threshold limit values (TLV). Inhalation and dermal contact are the potential exposure pathways. Protective clothing will be mandatory for field personnel specified in this Plan. In addition, respiratory protective devices are required to be worn by each person on-site or to be within easy reach should irritating odors be detected or irritation of the respiratory tract occur.

TABLE 1
EXPOSURE LIMITS OF ANTICIPATED CHEMICAL CONTAMINANTS
IN PARTS PER MILLION (ppm)

Contaminant	PEL	EL	ED	CL	TWA	STEL
Benzene* [skin] & [carc]	1	---	-----	---	10	5
Ethylbenzene	100	---	-----	---	100	125
Toluene [skin]	100	200	10 min per 8 hours	500	100	150
Xylene (o, m, & p isomers) [skin]	100	200	30 min per 8 hours	300	100	150

PEL - permissible exposure limit: 8 hours, time-weighted average, California Occupational Safety and Health Administration Standard (CAL-OSHA).

- EL - excursion limit: maximum concentration of an airborne contaminant to which an employee may be exposed without regard to duration provided the 8 hours time-weighted average for PEL is not exceeded (CAL-OSHA).
- ED - excursion duration: maximum time period permitted for an exposure above the excursion limit but not exceeding the ceiling limit (CAL-OSHA).
- CL - Ceiling limit: maximum concentration of airborne contaminant which employees may be exposed permitted (CAL-OSHA).
- TWA - time-weighted average: 8 hours, [same as threshold limit value (TLV)], American Conference of Governmental Industrial Hygienists (ACGIH).
- STEL - short-term exposure limit: 15 minutes time-weighted average (ACGIH).
- [carc] - substance identified as a suspected or confirmed carcinogen.
- [skin] - substance may be absorbed into the bloodstream through the skin, mucous membranes or eyes.
- * - Federal OSHA benzene limits given for PEL and STEL; STEL has a 50 minutes duration limit.

A brief description of the physical characteristics, incompatibilities, toxic effects, routes of entry and target organs has been summarized from the NIOSH Pocket Guide to Chemical Hazards for the contaminants anticipated to be encountered. This information is used in on-site safety meetings to alert personnel to the hazards associated with the expected contaminants.

Benzene:

Benzene is a colorless, aromatic liquid. Benzene may create an explosion hazard. Benzene is incompatible with strong oxidizers, chlorine, and bromine with iron. Benzene is irritating to the eyes, nose and respiratory system. Prolonged exposure may result in giddiness, headache, nausea, staggering gait, fatigue, bone marrow depression or abdominal pain. Routes of entry include inhalation, absorption, ingestion and skin or eye contact. The target organs are blood, the central nervous system (CNS), skin, bone marrow, eyes and respiratory system. Benzene is carcinogenic.

Ethylbenzene:

Ethylbenzene is a colorless, aromatic liquid. Ethylbenzene may create an explosion hazard. Ethylbenzene is incompatible with strong oxidizers. Ethylbenzene is irritating to the eyes and mucous membranes. Prolonged exposure may result in headache, dermatitis, narcosis or coma. Routes of entry include inhalation, ingestion and skin or eye contact. The target organs are the eyes, upper respiratory system, skin and the CNS.

Toluene:

Toluene is a colorless, aromatic liquid. Toluene may create an explosion hazard. Toluene is incompatible with strong oxidizers. Prolonged exposure may result in fatigue, confusion, euphoria, dizziness, headache, dilation of pupils, lacrimation, insomnia,

dermatitis or photophobia. Routes of entry are inhalation, absorption, ingestion and skin or eye contact. The target organs are the CNS, liver, kidneys and skin.

Xylene Isomers:

Xylene is a colorless, aromatic liquid. Xylene may create an explosion hazard. Xylene is incompatible with strong oxidizers. Xylene is irritating to the eyes, nose and throat. Prolonged exposure may result in dizziness, excitement, drowsiness, staggering gait, corneal vacuolization, vomiting, abdominal pain or dermatitis. Routes of entry are inhalation, absorption, ingestion and skin or eye contact. The target organs are the CNS, eyes, gastrointestinal tract, blood, liver, kidneys and skin.

General Project Safety Responsibilities:

Key personnel directly involved in the investigation will be responsible for monitoring the implementation of safe work practices and the provisions of this plan are (1) the drilling project supervisor and (2) Soil Tech Engineering, Inc. (STE) project field engineer. These personnel are responsible for knowing the provisions of the plan, communicating plan requirements to workers under their supervision and regulatory agencies inspectors and for enforcing the plan.

The personnel-protective equipment will be selected to prevent field personnel from exposure to fuel hydrocarbons that may be present at the site. To prevent direct skin contact, the following protective clothing will be worn as appropriate while working at the site:

1. Tyvek coveralls.
2. Butyl rubber or disposable vinyl gloves.
3. Hard hat with optional face shield.
4. Steel toe boots.
5. Goggles or safety glasses.

The type of gloves used will be determined by the type of work being performed. Drilling personnel will be required to wear butyl rubber gloves because they may have long duration contact with the subsurface materials. STE sampling staff will wear disposable gloves when handling any sample. These gloves will be changed between each sample.

Personnel protective equipment shall be put on before entering the immediate work area. The sleeves of the overalls shall be outside of the cuffs of the gloves to facilitate removal of clothing with the least potential contamination of personnel. If at any time protective clothing (coveralls, boots or gloves) become torn, wet or excessively soiled, it will be replaced immediately.

Total organic vapors will be monitored at the site with a portable PID. Should the total organic vapor content approach that of the threshold limit value (TLV) for any of the substances listed in Table 1, appropriate safety measures will be implemented under the supervision of the site project engineer. These precautions include, but are not limited to, the following: (1) Donning of respirators (with appropriate cartridges) by site personnel, (2) forced ventilation of the site, (3) shutdown of work until such time as appropriate safety measures sufficient to insure the health and safety of site personnel can be implemented.

No eating, drinking or smoking will be allowed in the vicinity of the drilling operations. STE will designate a separate area on site for eating and drinking. Smoking will not allowed at the vicinity of the site except in designated areas. No contact lenses will be worn by field personnel.

WORK ZONES AND SECURITY MEASURES:

The Project Engineer will call Underground Service Alert (USA) and the utilities will be marked before any drilling is conducted on-site, and the borings will be drilled at safe distances from the utilities. The client will also be advised to have a representative on-site to advise us in selecting locations of borings with respect to utilities or underground structures. Soil Tech Engineering, Inc. assumes no responsibility to utilities not so located. The first 5 feet will be hand augered before any drilling equipment is operated.

Each of the areas where the borings will be drilled will be designated as Exclusion Zones. Only essential personnel will be allowed into an Exclusion Zone. When it is practical and local topography allows, approximately 25 to 75 feet of space surrounding those Exclusion Zones will be designated as Contamination Reduction Zones.

Cones, wooden barricades or a suitable alternative will be used to deny public access to these Contamination Reduction Zones. The general public will not be allowed close to the work area under any conditions. If for any reason the safety of a member of the public (e.g. motorist or pedestrian) may be endangered, work will cease until the situation is remedied. Cones and warning signs will be used when necessary to redirect motorists or pedestrians.

Location and Phone Numbers of Emergency Facilities:

For emergency reasons, the closest facilities addresses and phone numbers are listed below:

City of Oakland Fire Department	911
Highland General Hospital 1411 East 31st Street, Oakland, CA	(510) 634-8055

Additional Contingency Telephone Numbers:

Poison Control Center (800) 523-2222

File No. 7-93-556-SI

Soil Tech Engineering Administrative Office (408) 496-0265
CHEMTREC (800) 424-9300

Note: Only call CHEMTREC stands for Chemical Transportation Emergency Center, a public service of the Chemical Manufacturer's Association. CHEMTREC can usually provide hazard information, warnings and guidance when given the identification number or the name of the product and the nature of the problem. CHEMTREC can also contact the appropriate experts.

This Site Safety Plan has been reviewed by the project engineer, STE field personnel and all subcontractors.

Amendments or modifications to this Plan may be written on a separate page and attached to this Plan. Any amendments or modifications must be reviewed and approved by the personnel name above.

File No. 7-93-556-SI

A P P E N D I X "D"

SOIL TECH ENGINEERING, INC.

OUTLINE OF DRUM HANDLING PROCEDURES
FOR THE PROPERTY
LOCATED AT 2740 98TH AVENUE
OAKLAND, CALIFORNIA

1. Test material per site-specific test requirements.
2. Classify Material as: Clean/Non-Hazardous.
3. Labeling of Drums:
 - * Pending Label: Used to describe material pending final analytical testing. Labels must be immediately affixed to drum during field work.
 - * Non-Hazardous Label: Required within 24 hours after analytical results are received.
 - * Hazardous Label: Required within 24 hours after analytical results are received.
 - * For Pick-Up Label: Must be affixed to drum prior to arranged pick-up date by certified hauler.
4. Remove within 21 days of generation. Empty drums, where material was disposed in bulk, must be removed the same day they are emptied.
5. Disposal of Material:
 - * Clean: Any local landfill.
 - * Non-Hazardous: Class III landfill.
 - * Hazardous: Class I landfill.

6. Manifests may be signed by the on-site contractor or consultant, owner, or other authorized representatives. The transporter should not sign the manifest.

It is the responsibility of the contractor, consultant and owner to arrange for a person to sign the manifest on the day of pick-up.

7. Reporting:

Reports shall include the following:

- * Completed soil and water worksheets.
- * Copy of the analytical results.
- * State how and where material was disposed.
- * If drums are emptied and material was disposed of in bulk, state how empty drums were handled.
- * The signed blue and yellow copies of the hazardous waste manifest.

SOIL:

1. Test Requirements and Methods: Per STE site-specific test requirements.
 - * TPH: EPA Method 8015.
 - * BTEX: EPA Method 8020.
 - * O&G: 503 D&E.
 - * Lead:
 - Total Lead - EPA Method 7421.

-Inorganic (soluble) Lead: DOS Title 22, Waste Extraction Test, §22-66700.

-Organic - EPA Method 8240.

* Ignitable:

2. Classification:

* Clean: TPH, BTEX, O&G, VOC and non-detectable (<100 ppm).

* Non-Hazardous if any are true:

-TPH less than 1,000 ppm.

-Lead - Inorganic (soluble) Lead less than 5 ppm (STLC)
or less than 100 ppm (TTLC).

- Organic Lead less than 13 ppm (TTLC).

* Hazardous if any are true:

-TPH greater than 1,000 ppm.

-Lead - Inorganic (soluble) Lead greater than 5 ppm (STLC)
or greater than 1,000 ppm (TTLC).

- Organic Lead greater than 13 ppm (TTLC).

-Ignitable - If TPH > 1,000 ppm, then conduct Bunsen Burner Test.

- If soil bums vigorously and persistently, soils are RCRA D001.

* VOC - less than 1,000 ppm.

3. Responsibility for Disposal:

* Clean: Consultant, contractor or owner.

* Non-Hazardous: Consultant, contractor or owner.

4. Types of Drums: DOT-17H for a solid, solidified, or sludge material.
5. Disposal Facility:
 - * Clean: Any local landfill.
 - * Non-Hazardous: Class III or II landfill.
 - * Hazardous: Class I landfill.

WATER:

1. Test Requirements and Methods: Per site-specific test requirements.
 - * TPH: EPA Method 8015.
 - * BTEX: EPA Method 602.
2. Classification:
 - * Clean Water: TPH and BTEX non-detectable.
 - * Hazardous:
 - Water with dissolved product and detectable TPH and BTEX.
 - Water with free product.
 - Free product only.
3. Responsibility for Disposal:
 - * Clean: Consultant/Contractor.
 - * Non-Hazardous: Consultant, contractor or owner.

4. Types of Drums: DOT-17C or DOT-17E for liquid or slurry.

5. Disposal Facility:

- * Clean Water: Into sanitary sewer per Local Sewer District approval or into storm sewer with proper approval from Water Board.

- * Non-Hazardous:

- Water with TPH and BTEX only.

- Water with free product.

- Arrange certified waste hauler to pick and dispose.

- * Hazardous:

- Free product only.

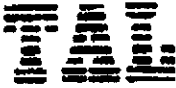
- Arrange disposal by a certified hazardous waste hauler.

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-6960

Facsimile (510) 783-1512



June 25, 1993

Mr. Mark East
E & G Construction
6433 Oberlyn Way
San Jose, California 95123

Dear Mr. East:

Trace Analysis Laboratory took fourteen soil samples on June 18, 1993, for your project, Rhino, 2740 98th Avenue, Oakland (our custody log number 3341).

These samples were analyzed for Total Petroleum Hydrocarbons as Gasoline, and Benzene, Toluene, Ethylbenzene, and Xylenes. Our analytical report and a copy of the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

If you should have any questions or require additional information, please call me.

Sincerely yours,

Scott T. Ferriman
for Scott T. Ferriman
Project Specialist

Enclosures

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-6960
Facsimile (510) 783-1512

LOG NUMBER: 3341
 DATE SAMPLED: 06/18/93
 DATE RECEIVED: 06/18/93
 DATE EXTRACTED: 06/21/93
 DATE ANALYZED: 06/23/93
 DATE REPORTED: 06/25/93

CUSTOMER: E&G Construction
 REQUESTER: Mark East
 PROJECT: 2740 98th Avenue

Sample Type: Soil

Method and Constituent:	Units	Composite of SP1-A, SP1-B, SP1-C		Composite of SP2-A, SP2-B, SP2-C		1	
		Concen- tration	Reporting Limit	Concen- tration	Reporting Limit	Concen- tration	Reporting Limit

DHS Method:

Total Petroleum Hydrocarbons as Gasoline	mg/kg	39	0.50	0.58	0.50	2,900	18
------------------------------------------	-------	----	------	------	------	-------	----

Modified EPA Method 8020 for:

Benzene	mg/kg	0.018	0.014	0.013	0.0050	19	0.71
Toluene	mg/kg	0.42	0.015	0.020	0.0050	200	0.74
Ethylbenzene	mg/kg	0.094	0.016	0.0064	0.0050	72	0.78
Xylenes	mg/kg	2.7	0.041	0.066	0.015	540	2.0

Method and
Constituent:

Units	2		3		4	
	Concen- tration	Reporting Limit	Concen- tration	Reporting Limit	Concen- tration	Reporting Limit

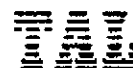
DHS Method:

Total Petroleum Hydrocarbons as Gasoline	mg/kg	310	1.8	ND	0.50	1,900	18
------------------------------------------	-------	-----	-----	----	------	-------	----

Modified EPA Method 8020 for:

Benzene	mg/kg	0.91	0.071	ND	0.0050	1.3	0.71
Toluene	mg/kg	19	0.074	0.007	0.0050	4.9	0.74
Ethylbenzene	mg/kg	3.6	0.078	ND	0.0050	8.1	0.78
Xylenes	mg/kg	57	0.20	0.020	0.015	230	2.0

Concentrations reported as ND were not detected at or above the reporting limit.



Trace Analysis Laboratory, Inc.

LOG NUMBER: 3341
 DATE SAMPLED: 06/18/93
 DATE RECEIVED: 06/18/93
 DATE EXTRACTED: 06/21/93
 DATE ANALYZED: 06/23/93
 DATE REPORTED: 06/25/93
 PAGE: Two

Sample Type: Soil

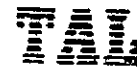
Method and Constituent:	Units	5		6		7	
		Concen- tration	Reporting Limit	Concen- tration	Reporting Limit	Concen- tration	Reportin Limit
DHS Method: Total Petroleum Hydro- carbons as Gasoline	mg/kg	1,900	18	550	18	ND	0.50
Modified EPA Method 8020 for:							
Benzene	mg/kg	ND	0.71	3.7	0.71	0.0053	0.00
Toluene	mg/kg	24	0.74	22	0.74	0.019	0.00
Ethylbenzene	mg/kg	12	0.78	13	0.78	ND	0.00
Xylenes	mg/kg	230	2.0	160	2.0	0.069	0.01

Method and Constituent:	Units	8		Method Blank	
		Concen- tration	Reporting Limit	Concen- tration	Reporting Limit
DHS Method: Total Petroleum Hydro- carbons as Gasoline	mg/kg	ND	0.50	ND	0.50
Modified EPA Method 8020 for:					
Benzene	mg/kg	0.0046	0.0050	ND	0.0050
Toluene	mg/kg	0.020	0.0050	ND	0.0050
Ethylbenzene	mg/kg	0.0058	0.0050	ND	0.0050
Xylenes	mg/kg	0.028	0.015	ND	0.015

QC Summary:

% Recovery: 105
 % RPD: 1.7

Concentrations reported as ND were not detected at or above the reporting limit.



Trace Analysis Laboratory, Inc.

LOG NUMBER: 3341
 DATE SAMPLED: 06/18/93
 DATE RECEIVED: 06/18/93
 DATE EXTRACTED: 06/22/93
 DATE ANALYZED: 06/23/93
 DATE REPORTED: 06/25/93
 PAGE: Three

Sample Type: Soil

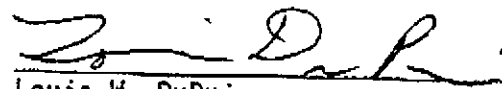
Method and Constituent:	Units	1		2		3	
		Concentration	Reporting Limit	Concentration	Reporting Limit	Concentration	Reporting Limit
EPA Method 7420: Lead	mg/kg	12	3.6	23	3.6	4.4	3.6
Method and Constituent:	Units	4		5		6	
		Concentration	Reporting Limit	Concentration	Reporting Limit	Concentration	Reporting Limit
EPA Method 7420: Lead	mg/kg	6.6	3.6	11	3.6	4.4	3.6
Method and Constituent:	Units	7		8		Composite of SPI-A, SPI-B, SPI-C	
		Concentration	Reporting Limit	Concentration	Reporting Limit	Concentration	Reporting Limit
EPA Method 7420: Lead	mg/kg	ND	3.6	ND	3.6	7.5	3.6
Method and Constituent:	Units	Composite of SP2-A, SP2-B, SP2-C		Method Blank			
		Concentration	Reporting Limit	Concentration	Reporting Limit		
EPA Method 7420: Lead	mg/kg	10	3.6	ND	3.6		

QC Summary:

% Recovery: 71

% RPD: **

Concentrations reported as ND were not detected at or above the reporting limit.
 **The RPD is not reportable since the sample prepared in duplicate was not detectable.

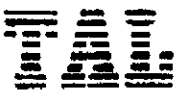

 Louis W. DuPuis
 Quality Assurance/Quality Control Manager

19 1 01

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-6960
Facsimile (510) 783-1512



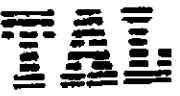
3341

CHAIN OF CUSTODY RECORD

Proj. No.		Project Name		No. of Containers	Analyses:	REMARKS
Company Name and Address:		2740-98th Ave				
Project Manager:		E & C Construction Mark East				
Sample ID	Date	Time	Site Location			
SP1-A	6/18/93	3:05 PM	Stock pile	1-BT	COMPOSITE TPH/G/BTEX	
SP1-B		3:08 PM				
SP1-C		3:10 PM				
SP2-A		3:11 PM				
SP2-B		3:12 PM				
SP2-C		3:13 PM				
Sampled by: (signature)		Date/Time	Relinquished by: (signature)		Date/Time	
Received by: (signature)		Date/Time	Relinquished by: (signature)		Date/Time	
Received for Laboratory by: (signature)		Date/Time	TURNAROUND TIME			
REMARKS						

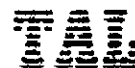
Trace Analysis Laboratory, Inc.
 3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-6960
 Facsimile (510) 783-1512



CHAIN OF CUSTODY RECORD

Proj. No.		Project Name		No. of Containers	Analyses: <i>TPHG / BTEX</i>				REMARKS
Company Name and Address:		Project Manager:							
Sample ID	Date	Time	Site Location						
1	6/18/93	2:30 PM	Trench	1-BT	X	X			Soil, odor
2		2:33 PM			X	X			
3		2:36 PM			X	X			
4		2:39 PM			X	X			
5		2:42 PM			X	X			
6		2:46 PM			X	X			
7		2:50 PM			X	X			
8		3:00 PM			X	X			
Sampled by: (signature) <i>for TAL</i>			Date/Time 6/18/93	Relinquished by: (signature)			Date/Time		
Received by: (signature)			Date/Time	Relinquished by: (signature)			Date/Time		
Received for Laboratory by: (signature) <i>for TAL</i>			Date/Time 6/18/93	TURNAROUND TIME 5 day		<i>for confirmation</i>			
REMARKS <i>Mark East</i>				44-BT, V-3, 5-Day					



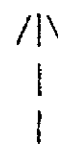
Trace Analysis Laboratory, Inc.

Site: Rhino

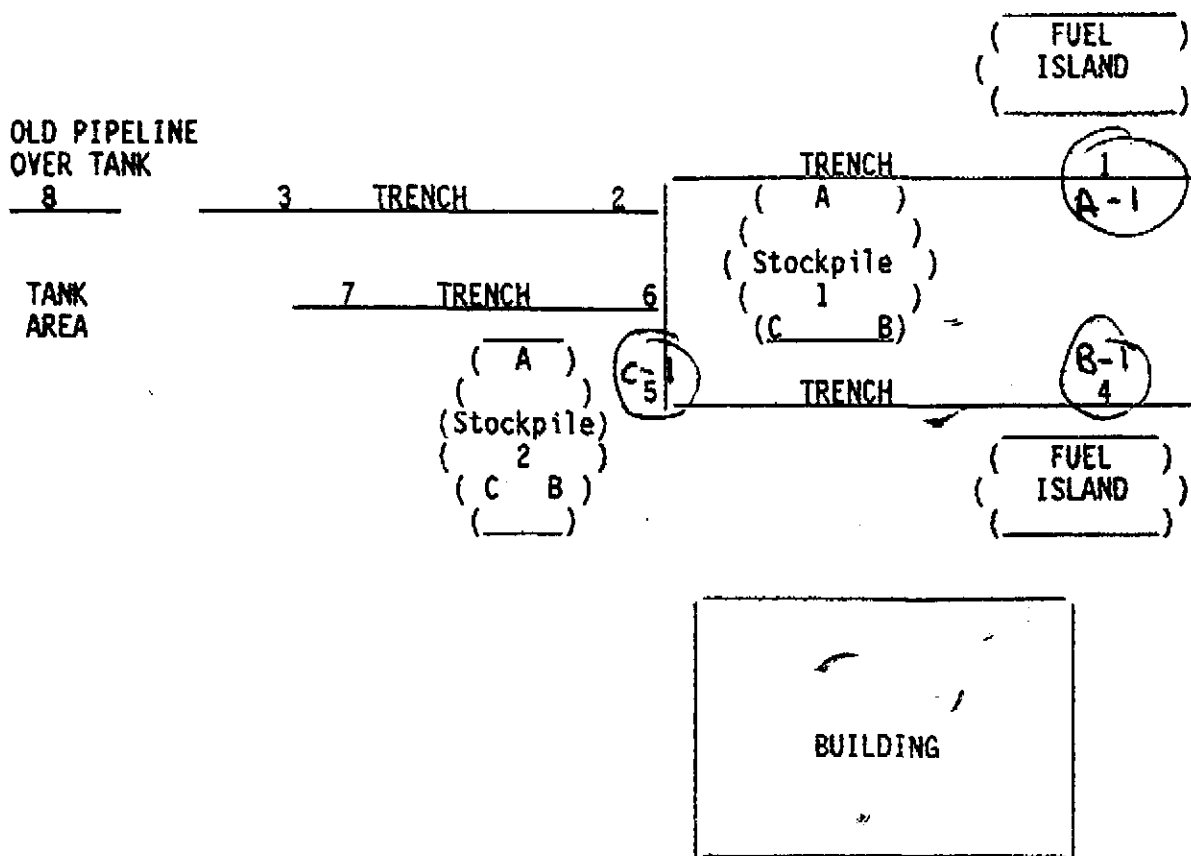
Address: 2740 98th Avenue

Oakland, CA

North



98th Avenue



Requester: Mark East

Customer: E&G Construction

Address: 6433 Oberlyn Way

San Jose, CA 95123

Date Sampled: 06/18/93

Log #: 3341

E AND G CONSTRUCTION
6433 OBERLIN WAY
SAN JOSE CA 95123

RE: FIELD SAMPLING AT

NAME: FREEWAY ARCO
ADDRESS: 2740 98TH AVE

DATE: 7-1, 7-2, 93

SAMPLING REPORT

Field sampling was undertaken in accordance with state and local enforcement agency standards and requirements for objective analytical information on the levels of residual contaminants found outside the primary containment structure.

Sampling was performed in accordance with approved methodology at the locations shown on the accompanying site diagram. Numbers on the site diagram are identification numbers which reference the analytical results which will be found in the separate laboratory report.

Sample material was collected in special containers appropriate to the type of analysis intended. Sample containers were sealed, chilled, and transported to a state certified hazardous waste testing laboratory with standard chain of custody records maintained at each transmittal.

Soil samples were taken by:

Company Name: E + G Construction

Address: 6433 OBERLIN WAY

SAN JOSE CA 95123

Representitive on site : MARK D. EAST / MARK LARSON

Signature of rep.: Mark D East / Mark Larson

SAMPLE COLLECTION

Date Collected 7-1-93
 Time Collected 5:30 PM
 Date Shipped 7-2-93
 Type Of Sample Soil Sample
 Sample Source Soil Below Island #2
 Observations _____

Collected By Mark Inso
 Sample Identification No. B-1
 Sample Container Brass Tube
 Analysis Needed TPH-M BTX+PE
 Sample Preservation N/A

WATER

GROUNDWATER
 Well Number _____
 Purge Method _____
 Collection Method _____
 Sample Equipment _____
 Total Well Depth _____ ft. Well Diameter _____ ft.
 Depth to Water _____ ft.
 Borehole Purge Volume _____ ft³
 Screened Interval _____ ft to _____ ft.
 Depth Sample Collected _____ ft.
 Pump Rate _____ gpm Total Pump Time _____ min

Pumping time Elapsed (min.)	Borehole Vol. Purged	Temp. (°C)	pH	E.C.

SURFACE WATER:
 Collection Location _____
 Collection Method _____
 Observations _____

SOIL

SOIL BORING:
 Boring No. N/A
 Collection Method: Back Hole Hand Driven
(Hollow stem, mud rotary, hand driven, etc.)
 Depth Collected 12'
 Observations: STained Soil until 12'

BOREHOLE LOCATION

EXCAVATION:

SAMPLE LOCATION: Northwall Southwall

(Floor)

 East Wall West Wall

Collection Method: Backhoe & Rubber mallet

SAMPLE COLLECTION

Date Collected 7-1-93
 Time Collected 3:20 PM
 Date Shipped 7-2-93
 Type Of Sample Soil Sample
 Sample Source Soil Below Island
 Observations _____

Collected By Mark East
 Sample Identification No. A-1
 Sample Container BRASS TUBE
 Analysis Needed TPH-2 BTEX
 Sample Preservation N/A

WATER

GROUNDWATER
 Well Number _____
 Purge Method _____
 Collection Method _____
 Sample Equipment _____
 Total Well Depth _____ ft. Well Diameter _____ ft.
 Depth to Water _____ ft.
 Borehole Purge Volume _____ ft³
 Screened Interval _____ ft to _____ ft
 Depth Sample Collected _____ ft.
 Pump Rate _____ gpm Total Pump Time _____ min.

Pumping time Elapsed (min.)	Borehole Vol. Purged	Temp. (°C)	pH	E.C.

SURFACE WATER:
 Collection Location _____
 Collection Method _____
 Observations _____

SOIL

SOIL BORING:
 Boring No. N/A
 Collection Method: Back Hoe
 (Hollow stem, mud rotary, hand driven, etc.)
 Depth Collected 13'
 Observations: Stained Soil until 13'

BOREHOLE LOCATION

EXCAVATION:

SAMPLE LOCATION: Northwall Southwall

⊙ Floor East Wall West Wall

Collection Method Back Hoe & Rubber Mallet

SAMPLE COLLECTION

Date Collected 7-2-93
 Time Collected 11:50 Am
 Date Shipped 7-2-93
 Type Of Sample Soil Sample
 Sample Source Corner of Island #1
 Observations _____

Collected By Mark Jenson
 Sample Identification No. C-1
 Sample Container Brass Tube
 Analysis Needed TPH-X BTX+E
 Sample Preservation N/A

WATER

GROUNDWATER
 Well Number _____
 Purge Method _____
 Collection Method _____
 Sample Equipment _____
 Total Well Depth _____ ft. Well Diameter _____ ft.
 Depth to Water _____ ft.
 Borehole Purge Volume _____ ft³
 Screened Interval _____ ft to _____ ft.
 Depth Sample Collected _____ ft.
 Pump Rate _____ gpm Total Pump. Time _____ min.

Pumping time Elapsed (min.)	Borehole Vol. Purged	Temp. (°C)	pH	E.C.

SURFACE WATER:
 Collection Location _____
 Collection Method _____
 Observations _____

SOIL

SOIL BORING:
 Boring No. N/A
 Collection Method: Hand Digger Bucket
 (Hollow stem, mud rotary, hand driven, etc.)
 Depth Collected 12'
 Observations: _____

BOREHOLE LOCATION

EXCAVATION:

SAMPLE LOCATION: Northwall Southwall
 East Wall West Wall
 Floor

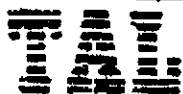
Collection Method: Backhoe + Rubber Mallet

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-6860

Facsimile (510) 783-1512



July 6, 1993

Mr. Mark East
E & G Construction
6433 Oberlyn Way
San Jose, California 95123

Dear Mr. East:

Trace Analysis Laboratory received three soil samples on July 2, 1993 for your project, 3-Way Arco, 2740 98th Avenue (our custody log number 3386).

These samples were analyzed for Total Petroleum Hydrocarbons as Gasoline and for Benzene, Toluene, Ethylbenzene and Xylenes. Our analytical report and a copy of the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

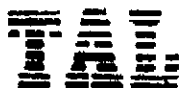
If you should have any questions or require additional information, please call me.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'Scott T. Ferriman', written in dark ink.

for
Scott T. Ferriman
Project Specialist

Enclosures



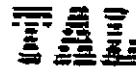
LOG NUMBER: 3386
 DATE SAMPLED: 07/01/93 and 07/02/93
 DATE RECEIVED: 07/02/93
 DATE EXTRACTED: 07/02/93
 DATE ANALYZED: 07/03/93
 DATE REPORTED: 07/06/93

CUSTOMER: E & G Construction
 REQUESTER: Mark East
 PROJECT: 3-Way Arco, 2740 98th Avenue

Sample Type: Soil

Method and Constituent:	Units	A-1		B-1		C-1	
		Concen- tration	Reporting Limit	Concen- tration	Reporting Limit	Concen- tration	Reporting Limit
DHS Method:							
Total Petroleum Hydro- carbons as Gasoline	mg/kg	ND	0.50	15	0.50	ND	0.50
Modified EPA Method 8020 for:							
Benzene	mg/kg	ND	0.0050	0.15	0.0072	0.37	0.0072
Toluene	mg/kg	ND	0.0050	0.047	0.0073	0.041	0.0073
Ethylbenzene	mg/kg	0.0062	0.0050	0.036	0.0075	0.047	0.0075
Xylenes	mg/kg	ND	0.015	3.2	0.020	0.056	0.020

Concentrations reported as ND were not detected at or above the reporting limit.



LOG NUMBER: 3386
 DATE SAMPLED: 07/01/93 and 07/02/93
 DATE RECEIVED: 07/02/93
 DATE EXTRACTED: 07/02/93
 DATE ANALYZED: 07/03/93
 DATE REPORTED: 07/06/93
 PAGE: Two

Sample Type: Soil

Method and Constituent:	Units	Method Blank	
		Concentration	Reporting Limit
DHS Method:			
Total Petroleum Hydrocarbons as Gasoline	mg/kg	ND	0.50
Modified EPA Method 8020 for:			
Benzene	mg/kg	ND	0.0050
Toluene	mg/kg	ND	0.0050
Ethylbenzene	mg/kg	ND	0.0050
Xylenes	mg/kg	ND	0.015

QC Summary:
 % Recovery: 76
 % RPD: 3.6

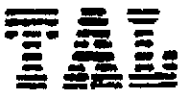
Concentrations reported as ND were not detected at or above the reporting limit.


 Louis W. DuPuis
 Quality Assurance/Quality Control Manager

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 • Hayward, California 94545

Tel. _____
Facsimile (510) 783-751



562-4505
Arco Station

CHAIN OF CUSTODY RECORD

Proj. No.		Project Name		No. of Containers	Analyses: <i>TPH/G/BTEX</i>				REMARKS
		3-Way Arco ³⁷⁴⁰ ₉₈₇₅ Avenue							
Company Name and Address:		E+G Construction 6433 Oberly Way San Jose, CA 95123							
Project Manager:		Mark East							
Sample ID	Date	Time	Site Location						
A-1	7/1	3:20	#1 Island at Arco Station	1-BT	✓				
B-1	7/1	5:30	Island #2	1-BT	✓				
C-1	7/2	11:50	Island #1 Corner of AT	1-BT	✓				
Sampled by: (signature)		Date/Time		Relinquished by: (signature)		Date/Time			
<i>Mark East</i>		3:15 7-2-93		<i>Mark East</i>		3:15 7-2-93			
Received by: (signature)		Date/Time		Relinquished by: (signature)		Date/Time			
Received for Laboratory by: (signature)		Date/Time		TURNAROUND TIME					
<i>Maureen Negrette for TAL</i>		7/2/93 3:15 PM		1-day ASAP TAT					
REMARKS									
<i>T/P, 3 BT, 1-Day, Y-Ce, etc</i>									

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

Hazardous Materials Inspection Form

II, III

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stas. 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N) _____
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) _____
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|--------------------------------------------------------------------------------------------|
| General | <input type="checkbox"/> 1. Permit Application 25284 (H&S) |
| | <input type="checkbox"/> 2. Pipeline Leak Detection 25292 (H&S) |
| | <input type="checkbox"/> 3. Records Maintenance 2712 |
| | <input type="checkbox"/> 4. Release Report 2651 |
| | <input type="checkbox"/> 5. Closure Plans 2670 |
| <hr/> | |
| Monitoring for Existing Tanks | <input type="checkbox"/> 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soils |
| | 3) Daily Vadose
One time soils
Annual tank test |
| | 4) Monthly Groundwater
One time soils |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/groundwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily Inventory |
| | 9) Other _____ |
| <hr/> | |
| New Tanks | <input type="checkbox"/> 7. Precip Tank Test 2643
Date: _____ |
| | <input type="checkbox"/> 8. Inventory Rec. 2644 |
| | <input type="checkbox"/> 9. Soil Testing 2646 |
| | <input type="checkbox"/> 10. Ground Water. 2647 |
| <hr/> | |
| New Tanks | <input type="checkbox"/> 11. Monitor Plan 2632 |
| | <input type="checkbox"/> 12. Access, Secure 2634 |
| | <input type="checkbox"/> 13. Plans Submit 2711
Date: _____ |
| | <input type="checkbox"/> 14. As Built 2635
Date: _____ |

Site ID # _____ Site Name FREELWAY STATION - SERVICE Today's Date 7/14/93

Site Address 2740 98th Ave.

City Corkland Zip 94603 Phone 512-4505

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

This inspection was made for a followup on the 24 hour sump test - all of which passed with no evidence of leakage. Since all contaminated soil was not satisfactorily removed from the ground at the site, you must submit a report indicating what was done between soil samplings and submit a work plan by an environmental consultant to further investigate and remediate the remaining soil contamination. The work plan should also indicate what is to be done with the consultant stockpiled soil. A letter outlining this proposed subsurface investigation/remediation must be received by this office before backfilling of the pit or any other further work is allowed. The letter should also indicate the proposed time schedule for the investigation and remediation. The investigation must determine the lateral and vertical extent of the soil contamination. In addition please submit an Unauthorized Release Form that was issued at the site.

Rev 6/88

Contact: K. CHAPMAN
 Title: _____
 Signature: _____

Inspector: Paul Owens
 Signature: _____

II, III

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name FREEWAY STATION + SERVICE Today's Date 2/9/93

Site Address 2740 93rd Ave
 City Oakland Zip 94603 Phone 562-4505

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

This inspection was for a secondary pipeline pressure test on the modified underground tanks by E+G Construction. All joints were soap tested and no leakage was observed. Initial pressure was at 5 psi which went down to 0-1 psi when the air was released. There was no one in attendance from the Oakland Fire Dept. at the time of inspection. The sumps were not ready to be tested because of a leak-they will be checked next week some time. Send the results from the soil sampling to this office ASAP.

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Sids 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(e)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|--------------------------------------------------|--------------------------------------------------------------------------------------------|
| General | <input type="checkbox"/> 1. Permit Application 25284 (H&S) |
| | <input type="checkbox"/> 2. Pipeline Leak Detection 25292 (H&S) |
| | <input type="checkbox"/> 3. Records Maintenance 2712 |
| | <input type="checkbox"/> 4. Release Report 2651 |
| | <input type="checkbox"/> 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | <input type="checkbox"/> 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soil |
| | 3) Daily Vadose
One time soil
Annual tank test |
| | 4) Monthly Groundwater
One time soil |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/groundwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily Inventory |
| | 9) Other _____ |
| New Tanks | <input type="checkbox"/> 7. Pre-Test Tank Test 2643 |
| | Date: _____ |
| | <input type="checkbox"/> 8. Inventory Rec. 2644 |
| | <input type="checkbox"/> 9. Soil Testing 2646 |
| <input type="checkbox"/> 10. Ground Water 2647 | |
| <input type="checkbox"/> 11. Monitor Plan 2632 | |
| <input type="checkbox"/> 12. Access, Secure 2634 | |
| <input type="checkbox"/> 13. Plans Submit 2711 | |
| Date: _____ | |
| <input type="checkbox"/> 14. As Built 2635 | |
| Date: _____ | |

Rev 8/88

Contact: K. GHOFRANI

II, III

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name FREEMWAY STATION + SERVICE Today's Date 2/7/93

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2740 98th Ave.
 City Oakland Zip 94603 Phone 562-4505

___ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.B ACUTELY HAZ. MAT'L'S

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(a)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(a)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|----------------------------------------------------------------------------------------|
| General | ___ 1. Permit Application 25284 (H&S) |
| | ___ 2. Pipeline Leak Detection 25292 (H&S) |
| | ___ 3. Records Maintenance 2712 |
| | ___ 4. Release Report 2651 |
| | ___ 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | ___ 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time test |
| | 3) Daily Vadose
One time test
Annual tank test |
| | 4) Monthly Gndwater
One time test |
| | 5) Daily Inventory
Annual tank testing
Cont pbe leak det
Vadose/gndwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pbe leak det |
| | 7) Weekly Tank Gauge
Annual tank test |
| | 8) Annual Tank Testing
Daily Inventory |
| | 9) Other _____ |
| New Tanks | ___ 7. Precs Tank Test 2643 |
| | Date: _____ |
| | ___ 8. Inventory Rec. 2644 |
| | ___ 9. Soil Testing 2644 |
| | ___ 10. Ground Water 2647 |
| | ___ 11. Monitor Plan 2632 |
| | ___ 12. Access, Secure 2634 |
| | ___ 13. Plans Submit 2711 |
| | Date: _____ |
| | ___ 14. As Bult 2635 |
| Date: _____ | |

Comments:

This inspection was made for a primary pipe test on the recently ^{UST} modification done by E+G Construction. The initial starting pressures were 76 psi on the product lines and 40 psi on the vapor lines. All joints were soap tested and no leakage was observed. The final pressures were about 2 psi after the air pressure was released. There was no one present from the Oakland Fire Dept. to witness this test at the time of inspection.

Rev 8/88

Contact: K. Ghafrani
 Title: owner
 Signature: [Signature]

Inspector: Ron Owens
 Signature: [Signature]

II, III

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II, III

Site ID # _____ Site Name Valley Station Today's Date 6/29/93

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2740 95th Ave.

City Oakland Zip 94605 Phone _____

___ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- ___ III. Underground Tanks

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Rec'd? (Y/N)
- ___ 14. Offsite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(e)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25534(g)
- ___ 19. Trade Secret Requested? 25534(h)

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

III. UNDERGROUND TANKS (Title 23)

- General
- ___ 1. Permit Application 25284 (H&S)
 - ___ 2. Pipeline Leak Detection 25292 (H&S)
 - ___ 3. Records Maintenance 2712
 - ___ 4. Release Report 2651
 - ___ 5. Closure Plans 2670

- Monitoring for Existing Tanks
- ___ 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
Semi-annual groundwater
One time soil
 - 3) Daily Vadose
One time soil
Annual tank test
 - 4) Monthly Groundwater
One time soil
 - 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon.
 - 6) Daily Inventory
Annual tank testing
Cont pipe leak det
 - 7) Weekly Tank Gauge
Annual tank test
 - 8) Annual Tank Testing
Daily Inventory
 - 9) Other _____

- ___ 7. Precs Tank Test 2643
Date: _____
- ___ 8. Inventory Rec. 2644
- ___ 9. Soil Testing 2646
- ___ 10. Ground Water 2647

- New Tanks
- ___ 11. Monitor Plan 2632
 - ___ 12. Access Secure 2634
 - ___ 13. Plans Submit 2711
Date: _____
 - ___ 14. As Built 2635
Date: _____

Comments:

on site for observation/consultation.
samples had been taken of the soil under
the single walled permit at the site
in addition, three contaminated spots from
310 ppm TPH-G to 2900 ppm - still obvious.
to have further samples taken of soil where
contamination was found. Several
photographs of area taken, the contaminated
soil should be manifested to an
appropriate waste facility.

① Provide re-sampling in contaminated
areas of facility.

② Send results to this office

& N.D. No further investigation will be
unnecessary.

Rev 6/88

Contact: X G. G. F. ...
Title: _____
Signature: _____

Inspector: _____
Signature: _____

II, III

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name FREEWAY STATION Today's Date 6/15/93

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2740 98th Ave.

City Oakland Zip 94605 Phone 562-4505

___ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.B ACUTELY HAZ. MATS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|--------------------------------------------------------------------------------------------|
| General | ___ 1. Permit Application 25284 (H&S) |
| | ___ 2. Pipeline Leak Detection 25292 (H&S) |
| | ___ 3. Records Maintenance 2712 |
| | ___ 4. Release Report 2651 |
| | ___ 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | ___ 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soil |
| | 3) Daily Vadose
One time soil
Annual tank test |
| | 4) Monthly Groundwater
One time soil |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/groundwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily Inventory |
| | 9) Other _____ |
| New Tanks | ___ 7. Pre-Test Tank Test 2643 |
| | Date: _____ |
| | ___ 8. Inventory Rec. 2644 |
| | ___ 9. Soil Testing 2646 |
| | ___ 10. Ground Water 2647 |
| | ___ 11. Monitor Plan 2632 |
| | ___ 12. Access Secure 2634 |
| | ___ 13. Plans Submit 2711 |
| | Date: _____ |
| | ___ 14. As Built 2635 |
| Date: _____ | |

Comments:

This inspection was to observe soil sampling done by Lou Dutuis of Trace Analysis Lab at the single welded fiberglass piping was removed from 3 UGTs. There were 8 discrete samples taken from the pit at each elbow and every 20 linear feet and 6 composite samples from 2 stockpiles. There was some green staining and potassium excess noted in some samples. There was also a water main break in the area that made some of the samples wet, but no water sample was taken (since it did not appear to be groundwater). Send results to this department and call for next inspection primary piping installation and pressure test.

Rev 6/88

Contact: _____
 Title: _____
 Signature: _____

Inspector: Ken Owens
 Signature: _____

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

5.80

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

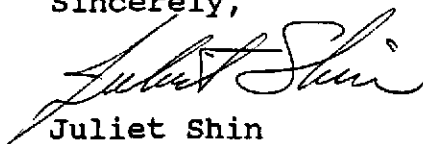
samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.

- 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



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)