

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
12-23-05

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

December 22, 2005

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Fuel Leak Case No. RO0000139; Former Exxon Station, 5175 Broadway St., Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Work Plan for Additional Site Characterization" dated September 12, 2005 by Golden Gate Tank Removal, Inc. We approve of the Work Plan. We request that you perform the proposed work and send us the technical reports requested below.

#### TECHNICAL REPORT REQUEST

Please submit a Soil and Groundwater Investigation Report to Alameda County Environmental Health (Attention: Don Hwang) by February 22, 2006.

#### ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and Toxics) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be relied upon for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is separate from and in addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, parties responsible for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports is required

in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

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

#### PROJECT APPROACH AND INVESTIGATION REPORTING

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and downgradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some initial key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines

for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:


- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- d) Proposed activities to investigate and fill data gaps identified above.
- e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- g) Several other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Report the information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Soil and Water Investigation (Results of Expedited Site Assessment) Report requested below.

Ms. Mehdizadeh  
December 22, 2005  
Page 4 of 4

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang". The signature is written in a cursive style with a long horizontal stroke at the end.

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Golden Gate Tank Removal, Inc. 255 Shipley Street San Francisco, CA 94107  
Donna Drogos  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



505  
10-6-04

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

October 6, 2004

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Fuel Leak Case No. RO0000139; Former Exxon Station, 5175 Broadway St., Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Conducting Human Health Risk Assessment" dated February 17, 2004 by SOMA Environmental Engineering, Inc. The purpose of the report was to evaluate the adverse impact of the residual chemicals in the groundwater on human health. We request that you address the following technical comments and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Soil Exposure Pathways - Direct contact with soil was not evaluated. However, contaminant concentrations of up to 190 milligrams/kilogram (mg/kg) Total Petroleum Hydrocarbons-Gasoline (TPH-G) and 1.7 mg/kg benzene, were detected in the boring for MW-1. Therefore, please postpone proposal for human health screening evaluation for soil contaminants until site and soil characterizations have been completed.
- 2) Air Exposure Pathways - (Water Exposure Pathways - Potential emissions of groundwater VOCs into indoor air was evaluated as Air Exposure Pathways.) The DTSC-Modified Johnson and Ettinger (J&E) Model was utilized, specifically the Screening Groundwater Model or GW-SCREEN.
  - a) The data from the most recent sampling event, July 18, 2002, were used as input concentrations for the J&E Indoor Air Model. Instead, the more conservative highest concentration detected ought to have been used.
  - b) Site-specific physical parameters (e.g., total porosity, air-filled porosity, water-filled porosity and organic carbon content) were not measured at this site. Therefore, the default values ought to have been used.

Nevertheless, the total excess cancer risk for exposure to indoor air emissions associated with benzene detected in STMW-4 was calculated to be 2.5E-06. This exceeds the target total excess individual cancer risk of 1 E-06. Please postpone review of your human health screening evaluation and proposal to address these issues.

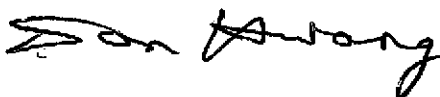
- 3) Site Characterization - Up to 13,800 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G) October 4, 2002 most recent quarter, maximum 72,000 ug/l and 590 ug/l benzene, have been detected in onsite monitoring wells. The lateral and vertical extent of your dissolved contaminant plume is undefined. Please propose additional sampling locations to define the plumes associated with your site in the Work Plan requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for the additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water sampling tool would be appropriate for this investigation.
- 4) Source Characterization - Up to 970 mg/kg Total Petroleum Hydrocarbons-Gasoline (TPH-G) were detected in contaminated soil collected from downgradient borings MW-2 and MW-3. VSB-1 not on site plan. Thus, the source area has not been delineated. We request that you propose additional borings to delineate the lateral and vertical extent of soil contamination in the source area. Please propose boring locations in the Work Plan requested below.
- 5) Soil samples from borings - Include those at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination. Please propose where soil samples will be collected from borings in the Work Plan requested below.

#### TECHNICAL REPORT REQUEST

Please submit a Work Plan to the Alameda County Environmental Health (Attention: Don Hwang) by December 6, 2004.

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

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive,  
Suite 203, San Ramon, California  
Donna Drogos  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-18-02

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

December 17, 2002

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Fuel Leak Case No. RO0000139; Former Exxon Station, 5175 Broadway St.,  
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Quarterly Groundwater Monitoring and Sampling ... October 25, 2002" by Enviro Soil Tech Consultants. Monitoring wells MW-3 and STMW-4 historically and this quarter have the highest Total Petroleum Hydrocarbons-Gasoline (TPH-G) and TPH-Diesel (TPH-D) concentrations, 11,000 micrograms/liter (ug/l) TPH-G and 4,900 ug/l TPH-D, for MW-3, and 13,000 ug/l TPH-G and 2,900 ug/l TPH-D, for STMW-4. The STMW-4 TPH-G concentration this quarter was the highest at this well and double recent concentrations. Recent benzene concentrations have been consistent. Benzene concentrations on October 4, 2002, were 280 ug/l and 590 ug/l, for MW-3 and STMW-4, respectively. However, STMW-4 is upgradient of the former gasoline tank excavation. For MW-1, TPH-G, TPH-D, and benzene concentrations, 1,800 ug/l, 520 ug/l, and 130 ug/l, were among the highest found at this well, and all were much higher than concentrations found recently. For MW-2, recent TPH-G, TPH-D, and benzene concentrations tended to fluctuate within a range. The TPH-G, TPH-D, and benzene concentrations on October 4, 2002, were 4,000 ug/l, 390 ug/l, and 440 ug/l, respectively. STMW-5's TPH-G and TPH-D concentrations have always fluctuated. On October 4, 2002, TPH-G and TPH-D concentrations were 1,400 ug/l and 60 ug/l, respectively. Recent benzene concentrations have been consistent. On October 4, 2002, benzene was 71 ug/l. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Over-excavation and verification soil sampling was documented in a copy of the November 30, 1990 report by Tank Protect Engineering submitted to our office. It is currently missing from our file. Please send another copy.
- 2) Monitoring well diagrams including the depths of perforation have not been provided. Submit.
- 3) Historical Hydraulic Gradient - Please show using a rose diagram and also include magnitude and direction.

- 4) Groundwater Analytical Results for Fuel Oxygenates by EPA Method 8260 – Please tabulate with a column for each compound.
- 5) Contaminant Concentrations and “Depth To Water” Graphs - Please include “Monitoring Well Screen Depths”.
- 6) Methyl tertiary-butyl ether (MTBE) groundwater concentrations have been low or nondetectable (ND) for all wells. Thus, groundwater analyses for MTBE may be suspended.

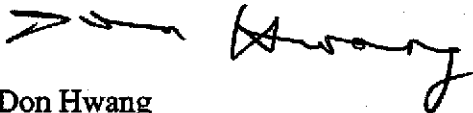
#### TECHNICAL REPORT REQUEST

Please submit the following technical reports to the Alameda County Environmental Health (Attention: Don Hwang) by January 17, 2003:

- a) November 30, 1990 report by Tank Protect Engineering
- b) Monitoring well diagrams
- c) Historical Hydraulic Gradient
- d) Revised Groundwater Analytical Results for Fuel Oxygenates by EPA Method 8260 Table
- e) Contaminant Concentrations and “Depth To Water” Graphs with “Monitoring Well Screen Depths”

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

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

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

Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



12-1801

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

December 13, 2001

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
RO0000139

The letter dated October 16, 2001 by SOMA Environmental Engineering proposing to evaluate risk from the elevated concentrations of Total Petroleum Hydrocarbons-Gasoline (TPH-G) in groundwater was reviewed. We concur with the inclusion of risk evaluation after differentiation of its hydrocarbon components. For EPA Method 8015B Modified, please specify carbon ranges C5 to C8, C9 to C12, C9 to C18, C19 to C36 for the aliphatics. The workplan is acceptable.

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

Sincerely,

Don Hwang  
Hazardous Materials Specialist

C: Mansour Sepehr, SOMA Environmental Engineering, 2680 Bishop Dr., Suite 203, San Ramon, CA 94583

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



12-26-00

20139

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

December 22, 2000

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
StId 3814

"Quarterly Groundwater Monitoring and Sampling ... November 29, 2000" by Enviro Soil Tech Consultants was reviewed. The results are consistent with previous quarterly groundwater monitoring samples. Again, as I stated in my letter of December 5, 2000, sampling by the apartment building to show that the contamination from your leaking underground tank site has not reached the apartment building or if contamination is present that it is at safe levels is necessary. Please submit a workplan, which will satisfy this requirement.

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

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



12-6-00

20139

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

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
StId 3814

When I last spoke to your consultant, Frank Hamedi-Fard of Enviro Soil Tech Consultants, on October 12, 2000, regarding my letter of May 17, 2000 which required sampling to show that the contamination by the apartment building which is adjacent and west of the aforementioned site is at safe levels, he disagreed with this requirement. Instead, he still wanted to install additional monitoring wells to identify a possible off-site source as proposed in their workplan dated October 5, 1994. I agreed to review the file again to determine if his proposal should be implemented instead. After again reviewing the file, I still do not think that the additional monitoring wells need to be installed and instead, sampling by the apartment building is needed. My review of the data does not convince me that an off-site source exists. If you and your consultant still disagree, then you may submit a written argument as to why the data indicates an off-site source exists, and if so, why the additional monitoring wells are needed. Otherwise, a workplan for sampling by the apartment building will be expected.

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

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 5-18-2000  
incl. cc's

20139

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

May 17, 2000

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
StId 3814

On April 12, 2000, I spoke to your consultant, Frank Hamedi-Fard of Enviro Soil Tech Consultants, regarding my letter of March 14, 2000 which required sampling to show that the contamination by the apartment building which is adjacent and west of the aforementioned site is at safe levels. He referred me to his letter of December 16, 1999 which included a workplan for additional soil and groundwater investigation dated October 5, 1994. This workplan included proposed monitoring well locations. None of the locations proposed were between the former underground tank excavation and the property line to the west which is where borings are needed. The work proposed in "Proposed Work Plan for Additional Soil and Groundwater Investigation... October 5, 1994" does not appear to be necessary for closure of this site. Instead, a workplan for sampling to demonstrate that the portion of the aforementioned site adjacent to the apartment building is at safe levels is required.

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

Sincerely,

Don Hwang  
Hazardous Materials Specialist

cc

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

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SNT 3-15-2000  
incl cc's

20139

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

March 14, 2000

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Dear Ms. Mehdizadeh:

Subject: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
StId 3814

A visit on March 9, 2000 found an apartment building adjacent and west of the aforementioned site and occupying most of that side of the property. There has not been sampling to show that the contamination by the apartment building is at safe levels. Provide a workplan to accomplish this within 30 days.

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

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 11-24-99  
Including cc's

20139

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

November 23, 1999

Mojdeh Mehdizadeh  
C/o Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Ms. Mehdizadeh:

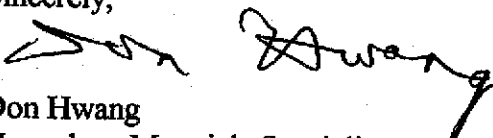
Thank you for your submittal of October 26, 1999 which included workplans dated March 6, 1990 and October 5, 1990, and the investigation and groundwater sampling report dated July 23, 1991. The latter provided the information requested for monitoring well construction and design specifications, and well logs for wells, STMW-4, and STMW-5. However, such information for wells, MW-1, MW-2, and MW-3, were not found.

The following information is still needed:

- 1) Monitoring well construction and design specifications, and well logs for wells, MW-1, MW-2, and MW-3.
- 2) "Enviro Soil Tech Consultants" has not provided an explanation for the sewage odors noted in all wells, MW-1, MW-2, MW-3, STMW-4, and STMW-5. Please ask your consulting company, Enviro Soil Tech Consultants, again to provide this information.
- 3) Another "SAMPLE LETTER (2): LIST OF LANDOWNERS FORM" is enclosed. It needs to be filled out and returned.

Please submit the information requested within 30 days. 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  
L-S-  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0139

CERTIFIED MAILER # P 368 729 457

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

September 1, 1999

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

2<sup>nd</sup> NOTICE OF VIOLATION

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

The following information previously requested from you have not been received:

- 1) The second quarterly groundwater monitoring and sampling report is required. The last report received is dated March 3, 1999 and covers sampling which occurred on January 28, 1999.
- 2) Monitoring well construction and design specifications, and well logs.
- 3) An explanation for the sewage odors noted in all wells, MW-1, MW -2, MW-3, STMW-4, and STMW-5.
- 4) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and requested to fill out a 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. 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: Frank Hamedi-Fard & Lawrence Koo, Soil Tech Engineering, Inc.,  
1761 Junction Ave., San Jose, CA 95112

The City of Oakland Fire Services, 1603 Martin Luther King, Fire Station 1,  
Oakland CA 94612

L.S.  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0139

ENVIRONMENTAL HEALTH SERVICES

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

September 16, 1999

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

2<sup>nd</sup> NOTICE OF VIOLATION

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

The following information previously requested from you have not been received:

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- 3) An explanation for the sewage odors noted in all wells, MW-1, MW -2, MW-3, STMW-4, and STMW-5.
- 4) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and requested to fill out a 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. 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: Frank Hamedi-Fard & Lawrence Koo, Enviro Soil Tech Consultants,  
131 Tully Rd., San Jose, CA 95111

The City of Oakland Fire Services, 1603 Martin Luther King, Fire Station 1,  
Oakland CA 94612

Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0139

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

July 28, 1999

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

NOTICE OF VIOLATION

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

The following information previously requested from you have not been received:

- 1) Continued quarterly groundwater monitoring and sampling. The last report received is dated March 3, 1999 and covers sampling which occurred on January 28, 1999. A report covering sampling after that date is required.
- 2) Monitoring well construction and design specifications, and well logs.
- 3) An explanation for the sewage odors noted in all wells, MW-1, MW -2, MW-3, STMW-4, and STMW-5.
- 4) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and requested to fill out a 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. 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: Frank Hamedi-Fard & Lawrence Koo, Soil Tech Engineering, Inc.,  
1761 Junction Ave., San Jose, CA 95112

Files  
LH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R039

ENVIRONMENTAL HEALTH SERVICES

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

June 24, 1999

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

The last two letters sent to you, dated May 7, 1999 and April 27, 1999, requested the following information:

- 1) Continued quarterly groundwater monitoring and sampling. The last report received is dated March 3, 1999 and covers sampling which occurred on January 28, 1999. A report covering sampling after that date is required.
- 2) Monitoring well construction and design specifications, and well logs.
- 3) Any "Quarterly Groundwater Monitoring and Sampling" reports dated between September 20, 1994, and November 15, 1996.
- 4) An explanation for the sewage odors noted in all wells, MW-1, MW -2, MW-3, STMW-4, and STMW-5.
- 5) Additionally, you were sent a letter entitled "LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS" and requested to fill out a form, "SAMPLE LETTER (2): LIST OF LANDOWNERS FORM".

To date, none of the information listed above has been submitted. 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: Frank Hamedi-Fard & Lawrence Koo, Soil Tech Engineering, Inc.,  
1761 Junction Ave., San Jose, CA 95112

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0139

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

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

#### 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.

Mr. Mohammed H. Mehdizadeh  
Page 2 of 2  
May 21, 1999

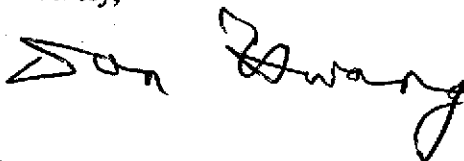
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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



R039

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

May 7, 1999

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

Thank you for submitting the reports, "Quarterly Groundwater Monitoring and Sampling..." prepared by Soil Tech Engineering, Inc., San Jose, CA, dated March 3, 1999, December 3, 1998, September 29, 1998, and July 1, 1997 for the subject site. The analytical results for the groundwater samples collected on 8/17/98, 11/16/98, and 1/28/99, were reviewed. The samples collected on 1/28/99 had the highest concentrations of Total Petroleum Hydrocarbon-Gasoline (TPH-G), benzene, toluene, and xylene, in each well, compared to the more recent sampling events. The MW-2 sample had benzene at 82 ug/kg, which was the highest concentration since 6/1/92. Toluene at 16 ug/kg, and xylene at 40 ug/kg, were the highest concentrations since 8/15/94. Methyl Tertiary-Butyl Ether (MTBE) was detected for the first time, 59 ug/kg. All the previous samples tested for MTBE, which started 11/7/96, were not detected (ND). In MW-3, benzene was 270 ug/kg and toluene was 110 ug/kg, which were the highest concentrations of each since 8/15/94. Xylene was 770 ug/kg, which was the highest concentration since 1/11/93. MTBE was detected for the first time, 170 ug/kg. All the previous samples tested for MTBE, which started 11/7/96, were not detected (ND). In STMW-4, TPH-G was 32 mg/l, which was the highest concentration since 9/28/92. Benzene was 660 ug/kg, which was the highest concentration since sampling of the well began on July 3, 1991. Xylene was 770 ug/kg, which was much higher than previous sample collected on 11/16/98. In STMW-5, TPH-G was 950 ug/kg, which was an increase from the prior sample collected on 11/16/98, which was ND. Benzene was 150 ug/kg, which was the highest concentration since 8/15/94. MTBE was detected for the first time, 11 ug/kg. All the previous samples tested for MTBE, which started 11/7/96, were not detected (ND).

All the other contaminants tested for in the groundwater samples collected on 8/17/98, 11/16/98, and 1/28/99, were either ND or low. The groundwater samples collected on 8/17/98, 11/16/98, and 1/28/99, were all ND for TPH-Diesel (TPH-D) for all wells. In MW-1, the concentrations of TPH-G, benzene, toluene, ethyl benzene, and xylene, were all ND except for TPH-G on 1/28/99, which was 110 ug/kg. The ethyl benzene results for

the groundwater samples collected on 8/17/98, 11/16/98, and 1/28/99, were either ND or low. In MW-2, on 1/28/99, ethyl benzene was ND. On 11/16/98, it was 2.3 ug/kg. On 8/17/98, it was 5.8 ug/kg. In MW-3, on 1/28/99, ethyl benzene was ND. On 11/16/98, it was 69 ug/kg. On 8/17/98, it was 31 ug/kg. In STMW-4, on 1/28/99, ethyl benzene was 16 ug/kg, on 11/16/98, 20 ug/kg, and on 8/17/98, 59 ug/kg. In STMW-5, on 1/28/99, ethyl benzene was 1.4 ug/kg, on 11/16/98, ND, and on 8/17/98, 14 ug/kg.

Sheens were observed in the groundwater samples collected on 8/17/98, 11/16/98, and 1/28/99 in MW-4 and MW-5. Sheens were also observed in MW-3 for the samples collected on 11/16/98 and 1/28/99, and in MW-1 on 1/28/99. No sheen was observed in MW-2, for samples collected on 8/17/98, 11/16/98, and 1/28/99, in MW-1, on 8/17/98 and 11/16/98, and in MW-3, on 8/17/98.

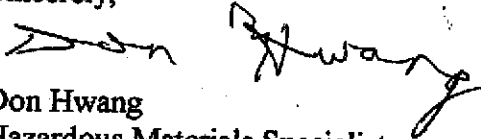
A sewage odor was detected in all wells during the recent sampling events, 8/17/98, 11/16/98, and 1/28/99, except MW-2, on 8/17/98, MW-3, on 8/17/98, and MW-4, on 8/17/98, however, a petroleum odor was detected in this well.

The following are required:

- 1) Continued quarterly groundwater monitoring and sampling.
- 2) Monitoring well construction and design specifications, and well logs.
- 3) Any "Quarterly Groundwater Monitoring and Sampling" reports dated between September 20, 1994, and November 15, 1996.
- 4) An explanation for the sewage odors noted in all wells, MW-1, MW -2, MW-3, STMW-4, and STMW-5.

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

Sincerely,

  
Don Hwang  
Hazardous Materials Specialist

C: Frank Hamedi-Fard & Lawrence Koo, Soil Tech Engineering, Inc.,  
1761 Junction Ave., San Jose, CA 95112

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 139

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

April 27, 1999

Mr. Mohammed H. Mehdizadeh  
678 La Corso Dr.  
Walnut Creek, CA 94598

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

Thank you for submitting the reports, "Quarterly Groundwater Monitoring and Sampling at ... 5175 Broadway St., Oakland, CA", by Soil Tech Engineering, Inc., San Jose, CA, dated May 21, 1998, March 20, 1998, October 17, 1997, July 1, 1997, and November 15, 1996. The report prior to these in our file is dated September 20, 1994. To complete our files, please submit any reports which you may have dated between September 20, 1994, and November 15, 1996.

Your "Leaking Underground Storage Tank Oversight Program" case cannot be closed at the present time because:

- 1) Monitoring well construction and design specifications, and well logs are required.
- 2) Any "Quarterly Groundwater Monitoring and Sampling" reports dated between September 20, 1994, and November 15, 1996 are required.
- 3) Groundwater field observations noted rainbow and brown sheens in wells, MW-3, STMW-4, and STMW-5 during the latest sampling events.
- 4) Groundwater contaminants have not shown a decreasing trend over time.
- 5) Groundwater field observations also noted sewage odors in all wells, MW-1, MW-2, MW-3, STMW-4, and STMW-5 during the latest sampling events. Please provide an explanation.

Continued quarterly groundwater monitoring and sampling is required.  
If you have any questions, please call me at (510) 567-6746.

Sincerely,

  
Don Hwang  
Hazardous Materials Specialist

C: Frank Hamedi-Fard & Lawrence Koo, Soil Tech Engineering, Inc.,  
1761 Junction Ave., San Jose, CA 95112  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 139

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

February 17, 1999

Mr. Mohammed Mehdizadeh  
c/o Mr. Ryan Mehdizadeh  
150 Random Way  
Pleasant Hill, CA 94523

Re: Former Exxon Station, 5175 Broadway St., Oakland, CA 94611;  
Stid 3814

Dear Mr. Mehdizadeh:

The "Leaking Underground Storage Tank Oversight Program" file for the subject site is being reviewed.

The enclosed letter dated Oct. 10, 1996, was sent to you. No correspondence or reports were found in the file addressing the issues of the letter. If work has been done to comply, please send the reports. Otherwise, you are asked to provide the information requested within 60 days.

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

Sincerely,

  
Don Hwang  
Hazardous Materials Specialist

C: files  
Enclosure



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO #139

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

October 10, 1996  
STID #3814

Mr. Mohammed Mehdizadeh  
c/o Mr. Ryan Mehdizadeh  
150 Random Way  
Pleasant Hill, California 94523

RE: Former Exxon Station - 5175 Broadway Street, Oakland, California 94611

Dear Mr. Mehdizadeh:

The Alameda County Department of Environmental Health Environmental Protection Division has recently reviewed the case file for the above referenced site. Four underground storage tanks (USTs) consisting of three 8,000 gallon gasoline USTs and one 550-gallon waste oil UST were removed on January 10, 1990. Holes were present in the former USTs. Soil and grab water samples were collected following the removal of the USTs. The samples showed the presence of petroleum hydrocarbon contamination at the site. Limited overexcavation was conducted to remove the contaminated soil. Five groundwater monitoring wells ( MW-1, MW-2, MW-3, STMW-4 and STMW-5) were installed to determine the extent of the groundwater contamination. Groundwater samples have been collected since April 1989. The last sampling event conducted on August 15, 1994 detected petroleum hydrocarbon contamination as high as 50,000 ppb TPH gasoline, 870 ppb benzene, 1,200 ppb toluene, 1,300 ppb ethyl benzene, and 3,000 ppb xylene.

Based on the review of all the data submitted for the subject site, the soil and groundwater investigation must be continued which includes the following tasks:

- 1) Monitor the groundwater every quarter.
- 2) Establish groundwater flow direction at the site.
- 3) Analyze the groundwater samples for the following target compounds: TPH gasoline, TPH diesel, benzene, ethyl benzene, toluene, xylene, methyl tertiary butyl ether (MTBE), and lead.
- 4) If TPH diesel is detected in the groundwater, polynuclear aromatic hydrocarbons should be included as target compound.

Mr. Mohammed Mehdizadeh  
c/o Mr. Ryan Mehdizadeh  
RE: 5175 Broadway Street, Oakland, CA 94611  
October 10, 1996  
Page 2 of 2

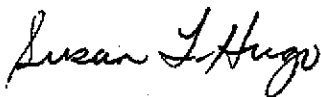
- 5) Check for the presence of free product in the wells. Free product should be removed in a manner that prevents the migration of the contaminant plume.
- 6) Please notify this agency 72 hours in advance of any field activity at the site

Quarterly groundwater monitoring reports must be submitted within 45 days after completion of the sampling activities. All reports and proposal must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professional involved with the project.

Lastly, you should initiate the quarterly groundwater monitoring program immediately since no monitoring has occurred for the past two years. .

If you have any questions concerning this letter, please call me at (510) 567-6780.

Sincerely,



Susan L. Hugo  
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health  
Kevin Graves, San Francisco bay RWQCB  
SH/ files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0139

March 29, 1991

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

Mr. Mohammad Mehdizadeh  
150 Random Way  
Pleasant Hill, CA 94523

Re: Results of quarterly groundwater sampling at 5175 Broadway,  
Oakland

Dear Mr. Mehdizadeh:

Thank you for submitting Soil Tech Engineering's February 1, 1991 report on groundwater samples from the above site. According to these results, it appears that gasoline and benzene contamination of groundwater are generally increasing. As a result, dissolved hydrocarbons have migrated beyond the limits of the existing monitoring well network. As suggested in Soil Tech Engineering's report, additional monitoring wells must be installed, off-site if necessary, to define the limits of the plume. Please prepare a proposal for this work, and submit it to this office and to the Water Board in Oakland by May 3, 1991. By this same date, please submit an additional deposit to the county, in the amount of \$400. Previous funds, which have been used on an hourly basis for direct county oversight of this project, are nearly depleted.

Quarterly sampling should continue at this site. The most recent quarterly report included no site-specific details on monitoring well development and recovery prior to sampling. This is important information at this site because of local geology that includes bedrock within the water-bearing zone. Subsequent reports therefore must assess groundwater flow patterns and other aquifer characteristics that will have a bearing on remediation.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,

Gil Wistar  
Hazardous Materials Specialist

cc: Frank Hamedi-Fard, Soil Tech Engineering (298 Brokaw Rd., Santa Clara, CA 95050)  
Lester Feldman, RWQCB  
Rafat A. Shahid, Asst. Agency Director, Environmental Health files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0139

November 9, 1990

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

Mr. Mohammad Mehdizadeh  
c/o Mehran Mehdizadeh  
150 Random Way  
Pleasant Hill, CA 94523

Re: Report submitted by Tank Protect Engineering for stockpiled  
soil sampling, 5175 Broadway, Oakland

Dear Mr. Mehdizadeh:

We have reviewed the report referred to above, which documents the collection of 22 discrete samples from 435 cubic yards of stockpiled soil. The report indicates that all samples contained "non-detect" levels of hydrocarbons, except for a few with trace amounts of BTEX components. Based on this information, we are permitting all soil to be backfilled into the pit.

Once this is accomplished, your next step will be to define the hydrogeology and groundwater contamination beneath the site. As I have discussed with Frank Hamedi-Fard of Soil Tech Engineering, the groundwater program must include the following elements:

1. Regular (quarterly) sampling and analysis from all wells.
2. Defining the "zero line" of groundwater contamination.
3. Based on the information thus obtained, preparing a remedial plan for groundwater cleanup, if appropriate.

All reports and work plans must be signed by a registered geologist or professional engineer, and submitted to us and to the Water Board in Oakland. If you have any questions about this letter, please contact me at 271-4320.

Sincerely,

Gil Wistar  
Hazardous Materials Specialist

cc: Frank Hamedi-Fard, Soil Tech Engineering (298 Brokaw Rd., Santa Clara, CA 95050)  
Marc Zomorodi, Tank Protect Engineering (2821 Whipple Rd, Union City, CA 95587)  
Lester Feldman, RWQCB  
Rafat A. Shahid, Asst. Agency Director, Environmental Health files

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0139

October 25, 1990

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

Mr. Mohammad Mehdizadeh  
c/o Mehran Mehdizadeh  
150 Random Way  
Pleasant Hill, CA 94523

Re: Work plan submitted by Soil Tech Engineering for 5175 Broadway,  
Oakland

Dear Mr. Mehdizadeh:

We have reviewed the work plan referred to above, and concur with it all, except for the section discussing replacement of stockpiled soil in the former tank pit. This section states that clean fill will be placed at the bottom of the pit up to a certain level, with the remaining volume of the pit being filled with currently stockpiled soil. As I have discussed recently with you, with Marc Zomorodi of Tank Protect Engineering, and with Frank Hamedi-Fard of Soil Tech, I am not convinced that the stockpiled soil is clean enough to permit its replacement in the pit.

In a letter from this office dated July 24, 1990, I stated that it would be acceptable to replace the stockpiled soil in the pit. However, this statement was based on the assumption of an appropriate sampling program having taken place, given the depth and volume of soil undergoing bioremediation. I later learned that this did not occur. Therefore, if you desire to replace the stockpiled soil in the former tank pit, this soil must be resampled in a manner that clearly demonstrates it is clean enough for such a use.

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

Sincerely,

Gil Wistar  
Hazardous Materials Specialist

cc: Frank Hamedi-Fard, Soil Tech Engineering (298 Brokaw Rd., Santa Clara, CA 95050)  
Marc Zomorodi, Tank Protect Engineering (2821 Whipple Rd, Union City, CA 95587)  
Lester Feldman, RWQCB  
Rafat A. Shahid, Asst. Agency Director, Environmental Health files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0139

July 24, 1990

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

Mr. Mehran Mehdizadeh  
150 Random Way  
Pleasant Hill, CA 94523

**RE: Letter and report on site investigation at 5175 Broadway,  
Oakland**

Dear Mr. Mehdizadeh:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the Tank Protect Engineering report and your letter dated July 17 regarding the above site. Because it appears that remediation has succeeded in reducing hydrocarbon levels in stockpiled soils to insignificant levels, this office will permit these soils to be backfilled in the hole. In addition, we are not requiring any further soil excavation at this time.

However, additional groundwater characterization is needed because of the hydrocarbons found in downgradient monitoring well MW-3. Even though there is not much water in storage in this mostly bedrock aquifer, the fact that contamination has migrated as far as MW-3 indicates the potential for connected flow and for a plume to have spread under the site. Therefore, we are requiring the installation of at least two additional monitoring wells, perhaps in the general locations shown on the attached diagram. These wells should yield better information about the extent of groundwater contamination downgradient of the point(s) of release. Ultimately, our concern is where the contaminated groundwater ends; thus it will be important to determine the "zero edge" of dissolved hydrocarbons. (If you wish to specify wells in alternative locations, please submit a workplan describing these locations.) In any case, all wells installed must be sampled and surveyed quarterly, at a minimum, with the samples analyzed for TPH-G and BTEX at a state-certified laboratory.

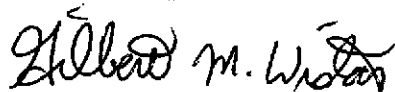
Your next consultant's report is due in this office and to the Regional Water Quality Control Board (RWQCB) by **September 19, 1990**. This report must include first-round sampling results from the additional wells, as well as second-round sampling results from the wells already on-site. The report must also present recommendations for further work, as needed. This office is the lead agency overseeing the site investigation and cleanup. The RWQCB is unable to manage the large number of fuel leak cases within Alameda County, and has therefore delegated this authority to our office. Nonetheless, you must continue to keep the Water Board apprised of all actions taken to characterize and remediate contamination, because the Board retains the ultimate responsibility for ensuring protection of waters of the state.

Mr. Mehran Mehdizadeh  
July 24, 1990  
Page 2 of 2

Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar  
Hazardous Materials Specialist

cc: Howard Hatayama, DOHS  
Lester Feldman, San Francisco Bay RWQCB  
Rafat Shahid, Asst. Agency Director, Environmental Health  
files