ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 5, 2007

Mr. Glen Poy-Wing
Oakland Auto Works
240 West MacArthur Blvd.
Oakland, CA 94611-5350

Mr. Warren Dodson
Dodson Limited
1323 South Flower Street
Los Angeles, CA 90015

Subject: Fuel Leak Case No. RO000142 and Geotracker Global ID T0600102243, Dodson Ltd., 240 West MacArthur Blvd., Oakland, CA 94611

Dear Mr. Poy-Wing and Mr. Dodson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled "Workplan for Soil Vapor Extraction System Installation and Operation," dated September 28, 2007. The Work Plan presents plans for installation, operation, and monitoring of a soil vapor extraction (SVE) system to address residual soil contamination in the northwestern portion of the site. Installation of two vapor extraction wells and three vapor monitoring points is included in the plans. Performance of the SVE system and effects of SVE on groundwater contamination are to be evaluated over time.

Installation and start-up of the SVE system is approved subject to acquiring requisite permits from the appropriate state and local agencies. We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **March 10, 2008** – SVE System Start-Up Report
- **30 days after the end of each quarter** – Quarterly Groundwater Monitoring and Remedial System Operation and Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791 or contact me my electronic mail at jerry.wickham@acgov.org).

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Henry Pietropaoli
Stellar Environmental Solutions, Inc.
2198 Sixth Street, Suite 201
Berkeley, CA 94710

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

August 24, 2007

Mr. Glen Poy-Wing
Oakland Auto Works
240 West MacArthur Blvd.
Oakland, CA 94611-5350

Mr. Warren Dodson
Dodson Limited
1323 South Flower Street
Los Angeles, CA 90015

Subject: Fuel Leak Case No. RO000142 and Geotracker Global ID T0600102243, Dodson Ltd., 240 West MacArthur Blvd., Oakland, CA 94611

Dear Mr. Poy-Wing and Mr. Dodson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled "Corrective Action Assessment Report," dated August 1, 2007. The Corrective Action Assessment Report presents the results from soil and groundwater sampling, a soil vapor extraction (SVE) pilot test, and an interim remedial action evaluation. The report concludes that residual soil contamination in the source area and extending downgradient from the source area will likely be a long-term source of groundwater contamination. Installation and operation of an SVE system is recommended to remove source area contamination. The effect of SVE on groundwater contamination is to be evaluated over time. We concur with the recommendation to prepare a Work Plan for SVE installation and operation. Please submit a Work Plan **by October 24, 2007** that presents details on the design, installation, operation, and monitoring of the SVE system. Estimated mass removal rates and permitting, regulatory, and community acceptance issues are also to be discussed.

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

TECHNICAL REPORT REQUEST

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

- **August 1, 2006** – Interim Remedial Action Work Plan
- **30 days after the end of each quarter** – Quarterly Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791 or contact me my electronic mail at jerry.wickham@acgov.org).

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Henry Pietropaoli
Stellar Environmental Solutions, Inc.
2198 Sixth Street, Suite 201
Berkeley, CA 94710

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

RO142

Wickham, Jerry, Env. Health

From: Wickham, Jerry, Env. Health
Sent: Friday, August 24, 2007 11:00 AM
To: 'hpietropaoli@stellar-environmental.com'
Subject: RE: R0#00142_Corrective Action Assessment_2007-08-01

Concurrence letter attached.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Henry Pietropaoli [mailto:hpietropaoli@stellar-environmental.com]
Sent: Friday, August 03, 2007 8:54 AM
To: Wickham, Jerry, Env. Health
Subject: R0#00142_Corrective Action Assessment_2007-08-01

Dear Mr. Wickham,

Regarding the above site, in view of the season and the currently very low groundwater levels at the Oakland Auto works, we feel it is a great opportunity to implement SVE this year before winter and that it could be very effective. We therefore are anxiously awaiting your review of our assessment of this site. If you have any questions or comments, please call and ask for me or Richard Makdisi.

Regards,

Henry

From: Henry Pietropaoli [mailto:hpietropaoli@stellar-environmental.com]
Sent: Thursday, August 02, 2007 7:26 PM
To: 'dehloptoxic@acgov.org'
Cc: Jerry Wickham (jerry.wickham@acgov.org)
Subject: R0#00142_Corrective Action Assessment_2007-08-01

Dear Mr. Jerry Wickham

The subject report has been uploaded to the ACEH and geotracker systems.

Regards,

HENRY PIETROPAOLI, P.G, R.E.A.
STELLAR ENVIRONMENTAL SOLUTIONS, INC.
2198 Sixth Street, Suite 201
Berkeley, CA 94710
Wk Phone: 510-644-3123

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

7

ENVIRONMENTAL HEALTH SERVICES
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1131 Harbor Bay Parkway, Suite 250
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March 14, 2006

Mr. Glen Poy-Wing
Oakland Auto Works
240 West MacArthur Blvd.
Oakland, CA 94611-5350

Mr. Warren Dodson
Dodson Limited
1323 South Flower Street
Los Angeles, CA 90015

Subject: Fuel Leak Case No. [redacted] Dodson Ltd., 240 West MacArthur Blvd., Oakland, CA – Work Plan Approval

Dear Mr. Poy-Wing and Mr. Dodson:

I am the case worker recently assigned to your case. Please send future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) has reviewed the case file for the above-referenced site and the document entitled "Workplan for Additional Site Characterization and Interim Remedial Action," dated March 14, 2006. The Work Plan describes a scope of work to advance two off-site borings and nine on-site borings. ACEH concurs with the proposed scope of work described in the Work Plan provided that the technical comments below are addressed during the field investigation.

We request that you address the technical comments below, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Proposed Locations of Soil Borings and Piezometers.** ACEH concurs with the proposed locations of soil borings BH-22 through BH-31. ACEH requests that proposed boring BH-32 be moved to a location approximately midway between boring BH-21, proposed boring BH-31, and monitoring well MW-1. Please see technical comment 2 regarding the depth of proposed borings BH-31 and BH-32.

2. **Depth of Proposed Soil Borings.** ACEH concurs with proposed sampling depths for borings BH-22 through BH-30. The Work Plan proposes to advance soil borings SB-31 and SB-32 to a depth of approximately 27-28 feet below ground surface (bgs) and collect one soil sample at the base of the boring. ACEH concurs with the collection of soil samples at approximately 27 feet bgs in each boring. However, ACEH requests that the borings be extended to a depth of 32 feet bgs and a second soil sample collected at approximately 32 feet bgs. The sampling depths may be revised in the field based on observations of

staining, odor, or elevated photoionization detector readings. If a sand or gravel water-bearing layer is encountered in borings BH-31 or BH-32 within the interval from approximately 25 to 32 feet bgs, we request that a second boring be advanced to collect a grab groundwater sample from the sand or gravel water-bearing layer. Please present the results of the sampling in the Subsurface Investigation Report requested below.

3. **Hydrogeologic Cross Sections.** The series of hydrogeologic cross sections are highly useful in the interpretation of subsurface conditions and should be updated in future reports as additional data are collected. Please check the 24" SS sanitary sewer line depicted on cross section B-B' as the 24" SS line appears to be south of cross section B-B' under MacArthur Boulevard.

4. **Interim Remedial Action Plan.** ACEH concurs with the proposal to evaluate interim remedial actions based on the results of the proposed investigation. Please submit an Interim Remediation Plan as requested below.

TECHNICAL REPORT REQUEST

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

- **May 15, 2006** – Quarterly Monitoring Report for First Quarter 2006
- **July 17, 2006** – Subsurface Investigation Report
- **August 1, 2006** – Interim Remedial Action Plan
- **August 15, 2006** – Quarterly Monitoring Report for Second Quarter 2006

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

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

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Bruce Rucker
Stellar Environmental Solutions, Inc.
2198 Sixth Street, Suite 201
Berkeley, CA 94710

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

RO142

Wickham, Jerry, Env. Health

To: Henry Pietropaoli
Cc: Richard Makdisi
Subject: RE: Oakland Auto works RO000142

Henry,

If the purpose of these samples is to evaluate the potential for SVE at the site then analysis by EPA Method 8260 or 8021 is acceptable. Samples could be collected using a Tedlar bag if the samples were analyzed within 48 hours. If an on-site laboratory is used, samples may be collected by syringe.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

-----Original Message-----
From: Henry Pietropaoli [mailto:hpietropaoli@stellar-environmental.com]
Sent: Friday, April 06, 2007 3:07 PM
To: Wickham, Jerry, Env. Health
Cc: Richard Makdisi
Subject: Oakland Auto works RO000142

dear Mr. Jerry Wickham,

I wanted to inform you that I am the project manager at Stellar Environmental Solutions for the Oakland Autoworks site at 240 W. MacArthur Blvd. (RO000142). We ar scheduled to implement the "Workplan for Additional Site Characterization and Interim Remedial Action", dated December 27, 2004, incorporating the technical comments in your letter, dated March 14,2006 on May 23 and 24,2007.

We are planning to collect 7 to 9 soil vapor samples. As a cost saving measure I was wondering if rather than collecting summa cannisters and analyzing by TO-14A and TO-3, if it would be OK to collect tedlar bag samples and analyze by 8015 and 8020?

Thank you,

Henry Pietropaoli, P.G., R.E.A

Stellar Environmental Solutions, Inc.
2198 Sixth Street, #201
Berkeley, CA 94710

Tel: 510-644-3123
Fax: 510-644-3859
hpietropaoli@stellar-environmental.com

STELLAR ENVIRONMENTAL SOLUTIONS, INC.
2198 Sixth Street
Berkeley, CA 94710
Telephone: (510) 644-3123
Fax (510) 644-3859

fax

To:	Don Hwang – Alameda County Health, Local Oversight Program
Fax #:	510-337-9335
From:	Bruce Rucker – Stellar Environmental Solutions
Date:	March 28, 2005
Subject:	Proposed Interim Remedial Action 240 W. MacArthur Blvd, Oakland, CA
Pages	3 (including this cover sheet)
NOTES:	

STELLAR
ENVIRONMENTAL SOLUTIONS, INC.

2198 SIXTH STREET, SUITE 201 · BERKELEY, CA 94710
TEL: (510)644-3123 · FAX: (510)644-3859
GEOSCIENCE & ENGINEERING CONSULTING

March 28, 2005

Mr. Don Hwang
Local Oversight Program
Alameda County Health Care Services Agency
Environmental Health – Environmental Protection
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Subject: 240 W. MacArthur Boulevard, Oakland, California
ACEH Fuel Leak Case no. RO0000142

Dear Mr. Hwang:

We are following up with Alameda County Health regarding our submittal of the December 27, 2004 Workplan for Additional Site Characterization and Interim Remedial Action. That workplan was submitted in response to the October 27, 2005 Alameda County Health letter. The workplan proposed additional site characterization (exploratory borehole drilling) to be followed by an Interim Remedial Action Plan focusing on the feasibility of installing a soil vapor extraction (SVE) system to address residual contaminant mass.

The property owner is committed to moving the site toward regulatory closure, and specifically, implementing the proposed corrective action. In order to take advantage of the upcoming dry season (when soil vapor extractiong is most effective), project planning work must be undertaken soon. We propose to move ahead on the following schedule:

- April 2005: Competitive bidding process for the drilling-related subcontractors and conducting pre-field work permitting and planning activities
- May 2005: Conduct the additional site characterization and Procure, install and start-up the remedial system
- May or June 2005: Submit the Interim Remedial Action Plan

The proposed schedule is in accordance with State of California regulations allowing a responsible party to proceed with a proposed corrective action after 60 days, if the local implementing agency (Alameda County Health) does not respond to the corrective action proposal (California Code of Regulations, Title 23, Division 3, Chapter 16, Underground Tank Regulations).

Please call us at 510-644-3123 if you have any questions regarding the proposed action.

Sincerely,

Bruce M. Rucker.

Bruce M. Rucker, R.G., R.E.A.
Project Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 3, 2004

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Oakland Auto Works, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff met with you, and Bruce Rucker and Richard Makdisi of Stellar Environmental Solutions on April 28, 2004, to discuss the information and proposals stated in "Amended Workplan for Additional Site Characterization" dated December 10, 2003, "Workplan for Additional Site Characterization" dated August 20, 2003, both by Stellar Environmental Solutions, and related correspondence. The Workplan was approved with the following changes:

1) The total number of boreholes in the sidewalk on Howe St. will be increased to at least four, equally spaced between proposed boreholes BH-17 and BH-19.
2) In the source area, at least one borehole will be drilled to the impervious layer below the saturated zone.
3) Purged groundwater samples will be collected.
4) Analyses for fuel oxygenates will be performed on groundwater samples from source locations, BH-11, BH-12, and BH-13.
5) All groundwater monitoring wells will be analyzed at least once for fuel oxygenates but if detected, it shall be included in future monitoring events.
6) The lead scavengers, Ethylene Dibromide (EDB) and Ethylene Dichloride (EDC) will be included in groundwater analyses for monitoring wells, MW-1, 5, and 6.
7) Depth discrete groundwater samples will be collected from at least one of the source locations.

TECHNICAL REPORT REQUEST

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

June 30, 2004 - Soil and Water Investigation Report
July 31, 2004 - Second Quarter 2004 Groundwater Monitoring Report
October 31, 2004 - Third Quarter 2004 Groundwater Monitoring Report
January 31, 2005 - Fourth Quarter 2004 Groundwater Monitoring Report
April 30, 2005 – First Quarter 2005 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 27, 2004

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Oakland Auto Works, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff "Soil and Groundwater Investigation Report" dated June 8, 2004 by Stellar Environmental Solutions. This report includes a preferential pathway survey, a water supply well survey, and the drilling of boreholes beneath the former underground storage tank locations and along the perimeter of the property. A Corrective Action Plan (CAP) was recommended. We feel that a CAP would be premature since delineation of the contaminant plume has not been completed. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Borehole Groundwater Analytical Results map – Cumulative BTEX concentrations are shown. Instead, please distinguish benzene concentrations. Please submit a revised map.
2) Site Characterization - 26,800 micrograms/liter (ug/l) TVHg detected in downgradient borehole BH-16. 68,300 ug/l TVHg, 617 ug/l benzene, 548 ug/l methyl tertiary butyl ether (MTBE), detected in BH-13. The lateral extent of your dissolved contaminant plume is still undefined. Please propose additional sampling locations to define the plumes associated with your site in the Work Plan requested below. Using the geologic cross-sections with 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.
3) Source Characterization - 122,000 ug/l TVHg and 10,000 ug/l TVHg have been detected in boreholes BH-20 and BH-19, respectively. Thus, the source area has not been vertically delineated. We request that you propose additional

borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.

4) Preferential Pathway Survey - The sanitary sewer lines located beneath Howe Street and W. MacArthur Boulevard could be installed within trenches backfilled with more permeable sand at depths which there is reasonable potential for groundwater to intersect the lines. Therefore, it must be determined if the contaminant plumes encountered the sanitary sewer lines spreading the contamination, particularly in the vertical direction to deeper water aquifers. Please submit a proposal with the Work Plan requested below.
5) Interim remedial action plan – We feel that a CAP would be premature. However, an interim remedial action plan may be proposed.
6) Historical Groundwater Monitoring Well Analytical Data - The data for MW-8 Jun-04 was a typo (Mar-04's data was duplicated). Please correct.
7) Borehole Groundwater Depths - Only first encountered depths were noted. Static depths will be required in future boreholes.

TECHNICAL REPORT REQUEST

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

December 27, 2004 - Work Plan
January 31, 2005 - Fourth Quarter 2004 Groundwater Monitoring Report
April 30, 2005 – First Quarter 2005 Groundwater Monitoring Report
July 31, 2005 - Second Quarter 2005 Groundwater Monitoring Report
October 31, 2005 - Third Quarter 2005 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

Hwang, Don, Env. Health

From: Bruce Rucker [brucker@stellar-environmental.com]
Sent: Friday, July 09, 2004 1:36 PM
To: Don Hwang
Cc: Donna Drogos
Subject: 240 W. MacArthur Blvd, Oakland

Don / Donna -

Hi Don and Donna -

We just completed another quarterly groundwater montoring event for the referenced site. No suprises in the results; the same wells near the former source showing the eleveated concentrations.

On June 8, 2004 we submitted the more extensive soil and groundwater investigation report for your review. Could you let us know the status of that review please? We woud like to discuss possible future actions either on the phone, or if you would prefer, at your offices. Thank you in advance for your reply.

Bruce M. Rucker, R.G., R.E.A
Stellar Environmental Solutions, Inc.
2198 Sixth Street, #201
Berkeley, CA 94710

Tel: 510-644-3123
Fax: 510-644-3859
e-mail: brucker@stellar-environmental.com

★ **Stellar Environmental Solutions, Inc.**
2198 Sixth Street, Berkeley, CA 94710
Tel: (510) 644-3123 • Fax: (510) 644-3859
Geoscience & Engineering Consulting

February 12, 2004

Ms. Donna Drogos - Supervisor
Local Oversight Program
Alameda County Health Care Services Agency
Environmental Health Services – Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Workplan for Additional Site Characterization
Oakland Auto Works (Former Vogue Tyres) – 240 W. MacArthur Blvd., Oakland, CA
ACEH Fuel Leak Case No. R00000142

Dear Ms. Drogos:

Stellar Environmental Solutions, Inc. (SES) is requesting your assistance in resolving issues on this case, with the specific objective of obtaining Alameda County Health's approval on work that the responsible party (Glen Poy-Wing) has proposed. Mr. Don Hwang is the Alameda County Health case officer. Below is a brief history of the case since the initial workplan was requested by Alameda County Health.

April 16, 2003. Alameda County Health letter requests a technical workplan for additional site characterization. That ltter asked for characterization work to be performed. The part of the of the County letter that referenced a utility survey (to identify potential preferential pathways), stated: "report your findings in the Soil and Water Investigation Report." None of the information requested (specifically well survey, preferential pathway survey or geologic cross-sections) were requested to be submitted with the workplan.

August 8, 2003. Letter from Mr. Poy-Wing to Alameda County Heath explaining that due to a consultant transition on the project, the technical workplan would be submitted in August 2003.

August 20, 2003. SES submits the requested technical workplan, which indicated that all activities requested by Alameda County Health would be conducted.

December 3, 2003. Alameda County Health sends a letter disapproving the technical workplan, and requests some technical revisions and additional activities (including revising some of the borehole locations, and increasing the frequency of soil sampling). This letter once again reiterated that all findings are to be reported in the Soil and Water Investigation Report, not in the technical workplan. The "disapproval" of the workplan occurred despite SES contacting Mr. Hwang numerous times to

indicate that as the workplan was taking so long to be reviewed, to please include any additional or exceptions as conditions of approval of the workplan so that the project work could move forward. The approach of approval contingent on some addition is a common response to regulatory workplans with the RWQCB, SCVWD, and other ACH case officers.

December 10, 2003. Following a discussion between SES and Mr. Hwang to clarify these issues, SES submits the amended technical workplan. In accordance with Mr. Hwang's verbally direction, the amendment specifically addressed only those revised items, rather than re-writing the entire workplan, to minimize the duration of the review cycle. The workplan amendment wholly addressed the Alameda County Health-requested revisions.

February 6, 2004. After several attempts by SES to contact Mr. Hwang to determine when the workplan would be approved, SES reaches Mr. Hwang by telephone and discusses the case. Mr. Hwang then states that Alameda County Health wants soil samples collected for analysis from the unsaturated zone (the first time this request was made either verbally or in writing). While this is a highly unusual technical request (since the "soil" data will be a combination of both sorbed-phase and dissolved-phase contamination), SES immediately agrees to conduct the additional analysis. Mr. Hwang suggested a meeting (between Alameda County Health, SES and the responsible party) to discuss the case. While we indicated that a meeting between all parties would certainly be beneficial after the collection of the new data, we stressed that a meeting should not be necessary to approve the proposed work, and it was our opinion that it would add additional, unnecessary delays. At our suggestion, in order to expedite the completion of the investigation work proposed in the workplan, Mr. Hwang agreed to send out a letter approving the workplan contingent upon conducting the saturated soil sampling. This approach was recently utilized by a different Alameda County Health case officer on a similar SES project.

February 9, 2004. Alameda County Health sends a letter with a request contradictory to previous requests (and contradictory to what Mr. Hwang verbally agreed to), as follows:

- Item 1 - Site Characterization. The letter says that the proposed borehole locations are "subject to the Utility Survey." The first two letters from Alameda County Health both said that the findings of the utility survey are to be reported in the Soil and Water Investigation Report, not in the workplan.

- Item 2 – Borehole Sampling. This item was the one Mr. Hwang requested verbally, and which we verbally agreed to do February 6, 2004.

- Item 3 – Well Survey. Mr. Hwang had previously (November 2003) verbally indicated that our already-conducted water well survey (including only water supply wells) would be adequate, however our amended workplan committed to doing another survey (to include all wells) if requested, and thus this could have been stated as a condition of the approval.

- Item 4 – Geologic Cross Sections. The first two letters from Alameda County Health both said that the cross-sections are to be reported in the Soil and Water Investigation Report, not in the workplan.

Summary

The property owner is committed to conducting the work necessary to move the site toward regulatory closure, and our previous submittals have agreed to conduct any and all work that Alameda County Health requests. However, there appears to be a serious communication problem between SES and Alameda County Health on this particular case. It has been 6-month delay in implementing the work. In our previous experience a six-month timeframe for the approval of a workplan is unprecedented. We have diligently tried to address Alameda County Health's requests, however the requirements have changed with the successive Alameda County Health letters disapproving the workplan. Now six months after the initial submittal, Alameda County Health is requesting information to be included in the workplan that previous Alameda County Health requests specifically said were to be discussed in the Soil and Water Investigation Report.

Our initial workplan and subsequent amendment fully addressed all the requirements stipulated in the associated Alameda County Health letters. We also verbally agreed with Mr. Hwang to conduct the saturated soil sampling he indicated was the only remaining technical issue for the final approval. We therefore respectfully request that Alameda County Health provide written of the proposed work. Please contact the undersigned directly if you have any questions.

Sincerely,

Bruce M. Rucker

Bruce M. Rucker, R.G., R.E.A.
Project Manager

cc: Mr. Glen Poy-Wing (responsible party)

STELLAR ENVIRONMENTAL SOLUTIONS, INC.
2198 Sixth Street, Suite 201
Berkeley, CA 94710
Tel: (510) 644-3123
Fax: (510) 644-3859

fax

to:	***Donna Drogos – Alameda County Health – LOP Unit***
fax #:	***510-337-9335***
from:	***Bruce Rucker***
date:	***2/12/04***
subject:	***240 W. MacArthur Boulevard, Oakland, CA***
pages:	***4 (including this cover page)***
NOTES:	

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

February 9, 2004

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "Amended Workplan for Additional Site Characterization" dated December 10, 2003 by Stellar Environmental Solutions. The Workplan is not approved. We request that you address the remaining technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization – The approval of the two proposed boreholes on Howe St. will be subject to the Utility Survey, which will determine if the groundwater contaminant plume will be intercepted prior to reaching the proposed, boring locations.

2) Borehole Sampling - The proposal calls for soil samples to not be collected from the saturated zone. We disagree because product can become entrapped below the water table. Therefore, adequate vertical delineation may require sampling from the saturated zone.

3) Well Survey – The Workplan proposes to only include water supply wells for the purpose of identifying potential sensitive receptors. However, wells also are to be evaluated as potential conduits for contamination to migrate from shallow aquifers to deep aquifers. Therefore, wells other than water supply wells may need to be evaluated.

4) Geologic cross-sections – Please also provide a length wide cross-section of the property.

Please revise the amended work plan to incorporate the changes requested above.

TECHNICAL REPORT REQUEST

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

April 9, 2004 – Amended Work Plan
60 days after Work Plan approval - Soil and Water Investigation Report
April 30, 2004 – First Quarter 2004 Groundwater Monitoring Report
July 31, 2004 - Second Quarter 2004 Groundwater Monitoring Report
October 31, 2004 - Third Quarter 2004 Groundwater Monitoring Report
January 31, 2005 - Fourth Quarter 2004 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

December 3, 2003

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "Workplan for Additional Site Characterization" dated August 20, 2003 by Stellar Environmental Solutions. The Workplan is not approved. We request that you address the remaining technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization – The Workplan proposes boreholes to define the groundwater contaminant plume. We do not agree with the three proposed boring locations east of the property because the groundwater flow has been indicated west and north. Instead, we believe that to define the plume, additional boreholes ought to be located west of the former fuel tanks and boreholes BH-6 and BH-4, and north of the former fuel tanks and MW-1 and MW-5 on the site side of Howe St. Please propose additional sampling locations to define the plume associated with your site in the amended work plan requested below.

2) Borehole Samples and Depths – a) The proposed number of borehole soil samples are inadequate. Instead, we please collect soil samples at a minimum of 5-foot intervals, changes in lithology, the soil/groundwater interface, and areas of obvious contamination. b) The proposed borehole depths are inadequate for vertical delineation. Several of the well logs indicated gasoline odors at 20 ft.

   Please propose procedures for sample collection and borehole depths in the amended work plan requested below.

3) Preferential Pathway Survey – a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Report your findings in the Soil and Water Investigation Report (SWI) Report requested below. b) Well Survey – The Workplan proposes to only include water supply wells. Water wells are to be included. Locate water wells within a quarter mile radius of the site. Show the location of the wells and the site on a map. List well construction details for each well. Please submit in the Soil and Water Investigation Report.

4) Geologic cross-sections – A-A' and B-B' were provided. Please show their locations on the site plan. In your cross-sections, please also include soil and groundwater analytical results, and utility conduits. Please use cross-sections to propose additional boreholes, evaluate the probability of the contaminant plumes encountering preferential pathways and the occurrence and distribution of MTBE at your site in the Soil and Water Investigation Report.

5) Methyl Tertiary-Butyl Ether (MTBE) – Include extended geologic cross-sections, which incorporate data (analytical results, utility conduits, well screens, etc.) from adjacent sites to use to evaluate the occurrence and distribution of MTBE at your site in the Soil and Water Investigation Report.

6) Professional seal - All technical reports must contain a statement of professional certification with the appropriate professional signatures and seals.

TECHNICAL REPORT REQUEST

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

January 31, 2004 – Amended Work Plan
January 31, 2004 - Fourth Quarter 2003 Groundwater Monitoring Report
60 days after Work Plan approval - Soil and Water Investigation Report
April 30, 2004 – First Quarter 2004 Groundwater Monitoring Report
July 31, 2004 - Second Quarter 2004 Groundwater Monitoring Report
October 31, 2004 - Third Quarter 2004 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

OAKLAND AUTO WORKS
240 W MacArthur Blvd.
Oakland, CA 94611
(510) 597-8388

August 8, 2003

Mr. Don Hwang – Hazardous Materials Specialist
Alameda County Environmental Health
Local Oversight Program
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Subject: Former Vogue Tyres Facility – Current Oakland Auto Works Facility
240 West McArthur Blvd., Oakland, California
ACEH Fuel Leak Case no. RO0000142

Dear Mr. Hwang:

I am the current property owner for the referenced fuel leak case. My wife and I purchased the property from Mr. Warren Dodson in 2002, and at that time we assumed full responsibility for the UFST-related investigation. We are committed to addressing the ACEH concerns stipulated in your April 16, 2003 letter, and apologize for not responding to the request for a technical workplan by the requested date of June 3, 2003. We are in the process of changing environmental consultants due to the obvious need for more rigorous evaluation of site contaminant conditions than has previously been conducted at the site, and we feel it is more appropriate to have a local consultant with considerable experience in defining the extent of hydrocarbon plumes and who has experience working with ACEH.

We have therefore retained Stellar Environmental Solutions, Inc. (SES, Berkeley, California) to begin work immediately on this case. Their first task will be to complete and submit to ACEH the requested technical workplan. We request that ACEH revise the workplan submittal date to August 20, 2003, to allow SES the time to conduct sufficient site evaluation to provide the ACEH-requested level of detail on technical rationale for further work. SES will also coordinate and conduct within approximately one week the next groundwater monitoring event. As requested in the ACEH letter, all groundwater samples will be analyzed for the additional potential site contaminants of concern (diesel and the lead scavengers EDB and EDC) We anticipate that the groundwater sampling documentation report will be submitted to ACEH on or before September 1, 2003.

Mr. Don Hwang
Alameda County Environmental Health
August 8, 2003

We are committed to bringing this site to regulatory closure, we look forward to continuing to work with you, and will count on your future written approval of actions taken at the site to support our applications for reimbursements under the State of California Underground Storage Tank Cleanup Fund. As I am the current property owner and responsible party for the environmental investigation, I request that ACEH address all further correspondence to me, and discontinue correspondence to Mr. Dodson. Should you have any questions/comments of a technical nature, please contact SES directly (attention Mr. Bruce Rucker at 510-644-3123). Feel free to contact me directly if you have any other questions.

Sincerely,

Glen Poy-Wing

4400 Ashe Road, Suite #206, Bakersfield, CA 93313
Office: (661) 831-1646 Fax: (661) 831-1771
E-Mail: aecinc@sbcglobal.net

Advanced Environmental Concepts, Inc.

Fax

To:	Don Hwang Alameda County	**From:**	Debbie Irwin
Fax:	(510) 337-9335	**Pages:**	
Phone:		**Date:**	08/04/03
Re:	Change of Address	**CC:**	

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

• **Comments:**

Don,

Would you please change the addressee and address for the following file: Leak Case No. RO0000142 Vogue Tyres. Mr. Glen Poy-Wing purchased the property from Mr. Warren Dodson.

Please change documentation to read:

Mr. Glen Poy-Wing
Oakland Auto Works
240 West MacArthur Blvd.
Oakland, CA 94611

(510) 597-8388
(510) 597-8291

Debbie

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

April 16, 2003

Warren Dodson
Dodson Ltd.
PO Box 69807
Los Angeles, CA 90067-0809

Dear Mr. Dodson:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "4th Quarter Groundwater Sampling Report" dated November 11, 2002 and "1st Quarter Groundwater Sampling Report" dated March 7, 2003 prepared by Advanced Environmental Concepts, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization – Up to 976,000 microgram/liter (ug/l) Total Petroleum Hydrocarbons-gasoline (TPH-g), 5,200 ug/l Benzene, and 4,200 ug/l Methyl Tertiary-Butyl Ether (MTBE) have been detected in monitoring wells at the property boundaries of your site. Thus, the lateral and vertical extent of your dissolved contaminant plumes 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 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.

2) Source Characterization – Up to 11,700 milligram/kilogram (mg/kg) TPH-G and 25.6 mg/kg Benzene have been detected in soil at the northeast corner of your site. Thus, the lateral and vertical extent of soil contamination is undefined. Please include your proposal for soil contamination is definition 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 additional sampling locations.

3) Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread contamination.
   a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Report your findings in the Soil and Water Investigation Report (SWI) Report requested below.
   b) Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map. List well construction details for each well. Please submit.

4) Groundwater Sampling for Total Petroleum Hydrocarbons-Diesel (TPH-D) – Borings BH-6 found 450,000 microgram/liter (ug/l) TPH-D on January 10, 1997. Groundwater sampling of the existing monitoring wells for TPH-D was only performed on August 8, 1997. MW-1, MW-2, MW-3, and MW-4, were all nondetectable (ND) for TPH-D. MW-1, MW-2, and MW-3, are all downgradient of and within 10 feet of either the former tank or dispenser locations. Please sample MW-1, MW-2, MW-3, MW-5, MW-6, and MW-8 for TPH-D. If TPH-D is detected in any well, it is to be incorporated into your regular monitoring plan.

5) Methyl Tertiary-Butyl Ether (MTBE) – Up to 4,200 ug/l MTBE has been detected onsite. The removal of a waste oil tank on October 3, 1996 has been documented. The background history of the site showed that the gasoline tanks were from Gulf Oil which was prior to the use of MTBE. None of the soil samples collected onsite found MTBE concentrations above the detection limits. Adjacent and upgradient of the site is Shell Service Station, 230 W. MacArthur Blvd., where up to 3,200 ug/l MTBE was found. However, MW-4 which is within 15 feet of the property line and is located on the Vogue Tyres side, was never found MTBE above the detection limits. We request that you develop extended geologic cross-sections which incorporate data (analytical results, utility conduits, well screens, etc.) from adjacent sites to use to propose work to evaluate the occurance and distribution of MTBE at your site.

6) Historical Groundwater Depths - Please add a column for groundwater depths to the Table of Analytical Results.

7) "Recommendation (3)" – Our review of boring logs did not find the confining clay layers described by your consultant. Please use the geologic cross sections requested above to clarify their assessment.

8) Historical Hydraulic Gradient – Please provide rose diagrams, which include cumulative groundwater gradients in all future reports submitted for this site.

9) Analyses for lead scavengers Ethylene Dibromide (EDB) and Ethylene Dichloride (EDC) were previously requested but omitted. Please include in the next round of groundwater monitoring. If any of the compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Also, please analyze for these compounds in source area soil. Please propose additional sampling locations to define the plumes associated with your site in the work plan requested below.

TECHNICAL REPORT REQUEST

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

- June 3, 2003 - Work Plan
- July 31, 2003 - Quarterly Report for the Second Quarter 2003
- October 31, 2003 - Quarterly Report for the Third Quarter 2003
- January 31, 2004 - Quarterly Report for the Fourth Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materi: Specialist
Local Oversight Program

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Environmental Health Services Administration
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

OAKLAND CA 946
PM
18 APR
2003

[redacted] Dodson
Dodson [redacted]
PO Box 69[redacted]
Los Angeles, CA [redacted]
90069

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

April 16, 2003

Warren Dodson
Dodson Ltd.
PO Box 69807
Los Angeles, CA 90067-0809

Dear Mr. Dodson:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "4th Quarter Groundwater Sampling Report" dated November 11, 2002 and "1st Quarter Groundwater Sampling Report" dated March 7, 2003 prepared by Advanced Environmental Concepts, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization – Up to 976,000 microgram/liter (ug/l) Total Petroleum Hydrocarbons-gasoline (TPH-g), 5,200 ug/l Benzene, and 4,200 ug/l Methyl Tertiary-Butyl Ether (MTBE) have been detected in monitoring wells at the property boundaries of your site. Thus, the lateral and vertical extent of your dissolved contaminant plumes 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 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.

2) Source Characterization – Up to 11,700 milligram/kilogram (mg/kg) TPH-G and 25.6 mg/kg Benzene have been detected in soil at the northeast corner of your site. Thus, the lateral and vertical extent of soil contamination is undefined. Please include your proposal for soil contamination is definition 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 additional sampling locations.

3) Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread contamination.
   a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Report your findings in the Soil and Water Investigation Report (SWI) Report requested below.
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4) Groundwater Sampling for Total Petroleum Hydrocarbons-Diesel (TPH-D) – Borings BH-6 found 450,000 microgram/liter (ug/l) TPH-D on January 10, 1997. Groundwater sampling of the existing monitoring wells for TPH-D was only performed on August 8, 1997. MW-1, MW-2, MW-3, and MW-4, were all nondetectable (ND) for TPH-D. MW-1, MW-2, and MW-3, are all downgradient of and within 10 feet of either the former tank or dispenser locations. Please sample MW-1, MW-2, MW-3, MW-5, MW-6, and MW-8 for TPH-D. If TPH-D is detected in any well, it is to be incorporated into your regular monitoring plan.

5) Methyl Tertiary-Butyl Ether (MTBE) – Up to 4,200 ug/l MTBE has been detected onsite. The removal of a waste oil tank on October 3, 1996 has been documented. The background history of the site showed that the gasoline tanks were from Gulf Oil which was prior to the use of MTBE. None of the soil samples collected onsite found MTBE concentrations above the detection limits. Adjacent and upgradient of the site is Shell Service Station, 230 W. MacArthur Blvd., where up to 3,200 ug/l MTBE was found. However, MW-4 which is within 15 feet of the property line and is located on the Vogue Tyres side, has never found MTBE above the detection limits. We request that you develop extended geologic cross-sections which incorporate data (analytical results, utility conduits, well screens, etc.) from adjacent sites to use to propose work to evaluate the occurance and distribution of MTBE at your site.

6) Historical Groundwater Depths - Please add a column for groundwater depths to the Table of Analytical Results.

7) "Recommendation (3)" – Our review of boring logs did not find the confining clay layers described by your consultant. Please use the geologic cross sections requested above to clarify their assessment.

8) Historical Hydraulic Gradient – Please provide rose diagrams, which include cumulative groundwater gradients in all future reports submitted for this site.

9) Analyses for lead scavengers Ethylene Dibromide (EDB) and Ethylene Dichloride (EDC) were previously requested but omitted. Please include in the next round of groundwater monitoring. If any of the compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Also, please analyze for these compounds in source area soil. Please propose additional sampling locations to define the plumes associated with your site in the work plan requested below.

TECHNICAL REPORT REQUEST

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

- June 3, 2003 - Work Plan
- July 31, 2003 - Quarterly Report for the Second Quarter 2003
- October 31, 2003 - Quarterly Report for the Third Quarter 2003
- January 31, 2004 - Quarterly Report for the Fourth Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

APR 11 2002

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

April 1, 2002

Warren Dodson
Dodson Ltd.
PO Box 69807
Los Angeles, CA 90067-0809

Dear Mr. Dodson:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "December 2001 Quarterly Groundwater Sampling" dated January 30, 2002, "October 2001 Quarterly Groundwater Sampling and Summary 'Hi-Vac' Report" dated December 15, 2001, and "July 2001 Quarterly Groundwater Sampling Report," dated August 31, 2001, all prepared by Advanced Environmental Concepts, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Groundwater Monitoring - After the use of 'Hi-Vac', groundwater contaminant concentrations generally decreased significantly. For a few contaminants, the concentrations increased. Monitoring wells MW-1, MW-2, MW-3, and MW-5, were subjected to vacuum extraction. Maximum Total Petroleum Hydrocarbons-Gasoline (TPH-G), Benzene, and Methyl Tertiary-Butyl Ether (MTBE) concentrations found on December 19, 2001 were 5,800 ug/l, 620 ug/l, and 370 ug/l, respectively. We request that you monitor the groundwater contaminant plumes on a quarterly basis to evaluate plume stability. Discuss the results of your plume monitoring in the Quarterly Reports requested below. We request that Quarterly Reports contain all of the following: a discussion of the results of your plume monitoring, an evaluation of the stability of your plume and recommendations for the installation of additional wells if your evaluation indicates your plume is migrating, and a description of any additional work that may be needed.

TECHNICAL REPORT REQUEST

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

- **April 15, 2002** - Quarterly Report for the First Quarter 2002
- **July 15, 2002** - Quarterly Report for the Second Quarter 2002
- **October 15, 2002** - Quarterly Report for the Third Quarter 2002
- **January 15, 2003** - Quarterly Report for the Fourth Quarter 2002

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

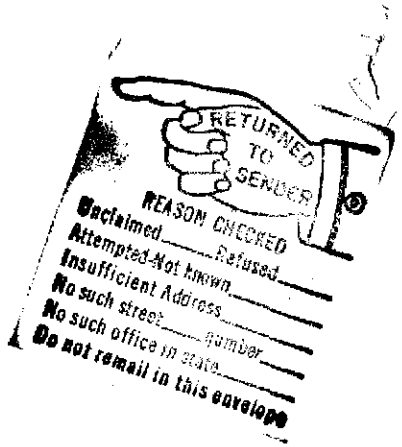
Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

CC:4580

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Environmental Health Services Administration
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577



Warren Doson
Dodson Ltd.
PO Box 69807
Los Angeles, CA 90069-0809

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 11, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"Summary 'Hi-Vac' Workplan" dated September 11, 2001 and "Using 'Hi-Vac' Technique" dated October 11, 2001, prepared by Advanced Environmental Concepts, Inc., were reviewed. The technique proposed may be implemented contingent upon approval by the Bay Area Air Quality Management District.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

√File

Mail this postcard to businesses and people who send you mail.

Please send mail to ... address beginning: 1 1 | 0 2 | 0 1
Month Day Year

Dodson LTD. Attn: Warren Dodson

My Name (Last name, first name, middle)

1323 S. FLOWER STREET

OLD Address

OLD Complete Street Address or PO Box or Rural Route and RR Box — Apt./Suite #

LOS ANGELES — CA — 90015

City or Post Office — State — ZIP or ZIP +4 Code

NEW Address

P O Box 69807

NEW Complete Street Address or PO Box or Rural Route and RR Box — Apt./Suite #

LOS ANGELES — CA — 90069-0807

City or Post Office — State — ZIP or ZIP +4 Code

NEW Telephone Number (Optional) — DON HWANG

RO 0000 142

Account Number (If applicable)

Warren L. Dodson — 1 1 | 0 2 | 0 1

Signature — Today's Date: Month Day Year

PS FORM 3576, September 2001

See http://www.usps.com/moversnet for more information.

ADVANCED ENVIRONMENTAL CONCEPTS INC

October 8, 2001

Mr. Robert Cave
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109

RE: Using "Hi-Vac" Technique
Former Vogue Tyres Facility
240 West MacArthur Boulevard
Oakland, California

Dear Mr. Cave:

Advanced Environmental Concepts, Inc. (AEC) is pleased to present the following information for your review so that we may gain approval to conduct a 5-day dual vapor extraction feasibility study at the former Vogue Tyres facility, 240 West MacArthur, Oakland, California.

The dual vapor extraction feasibility study will involve the use of a vacuum truck and degassing machine to remove gasoline impacted groundwater, and soil vapors from the water-bearing zone identified at approximately 13-feet below ground surface (bgs). The vacuum truck and degassing machine is owned and operated by Adams Services, 1612 Maple Avenue, Gardena, California. Their services will be rendered in accordance with South Coast Air Quality Management District (SCAQMD) permit to construct/operate #D93903. The degassing process is outlined in the attached permit as issued by the SCAQMD. AEC proposes to work under Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 47 for air stripping.

Conceptually, AEC proposes the following:

1) Insert a 1-inch diameter PVC stinger (15' in length) into the gasoline impacted groundwater well (MW-1, MW-2, MW-3, MW-5, and MW-6). The stinger will be fitted through the center of a rubber boot that will be slipped over the top of the groundwater well, then secured with an adjustable pipe clamp.

2) Apply a vacuum to the monitoring well (maximum 100-inches of water) to remove the gasoline impacted groundwater and maintain a steady drawdown state of equilibrium. Once the water has been "drawn down" within the well the vacuum effect will begin removing the gasoline vapors from the water-bearing zone. The groundwater will flow into the vacuum truck and the gasoline laden vapors will be controlled through the use of a degassing machine.

3) Through the use of PVC manifolded on the downstream side of the well and upstream of the degassing machine, AEC will be able to monitor vapors entering the system on a time dependent basis. The amount of readings collected per hour will be determined in the field. The readings will be collected using a factory calibrated LEL/O2 meter that has PPM capabilities. Air samples will also be collected using Tedlar bags to confirm the validity of our field readings.

4) Flow rate will also be logged to aid in calculating pounds per day, and gallons per day, of gasoline-range hydrocarbons removed from each well.

The test is estimated to run a maximum of five days as allowed by the BAAQMD. Groundwater samples will be collected from the monitoring wells prior to initiating the 5-day feasibility study, and the wells will be re-sampled at the completion of the study to gauge the effectiveness of the water removal. If the 5-day testing proves successful, AEC will apply for a dual vapor extraction permit and use the vacuum truck technique on a regular basis to conduct remediation of the gasoline impacted groundwater.

The vacuum truck is being used in lieu of a permanent extraction system for the following reasons:

1) There is limited access and space for extraction/sparge, or stripping equipment including water holding tanks.

2) Use of a vacuum truck allows access to the individual wells without having to manifold a piping system underground.

3) On-site water treatment, and discharge to sewer costs are approximately $1.00/gallon. Electrical costs to operate two 7.5-hp electric motors needed to turn the blowers are currently running $1500.00/month during the summer and $1200.00/month during the winter. Water treatment costs using the vacuum truck are estimated at $0.35/gallon, plus the hourly rate for the truck and operator..

4) The site lithology is characterized by a plastic clay from grade level to the water-bearing zone at approximately 13-feet bgs. The water-bearing zone has an approximate thickness of 3-feet and is "perched" on another plastic clay zone that acts an aquiclude. So far the gasoline has not migrated to the underlying clay layer. The gasoline contamination migrated to the water table from the former tank emplacement that penetrated the clay zone into the water-bearing zone. Therefore, there is only a minor volume of soil contamination because the migration has been restricted through the impermeable clay, however, the gasoline has migrated to the northwest within the water-bearing zone. The focus of this remediation is to affect secondary source removal on the water-bearing zone.

Thank you for your time and effort in reviewing this proposal and I look forward to your reply. Should you require additional information please do not hesitate to contact AEC at your convenience.

Sincerely

Advanced Environmental Concepts, Inc.

Jonathan L. Buck
Senior Geologist

cc: Mr. Don Hwang, Alameda County Environmental Health Department

Advanced Environmental Concepts, Inc.

FAX COVER SHEET

We have _____ page(s) to send, plus cover page.

If you need a re-send on any of the pages please call the number listed below within 15 minutes. If we do not hear from you, we will assume that all pages were received.

Facsimile sent to:

DATE: 10/8/01

TO: Alameda County

ATTN: Don Hwang

FAX Telephone #: 510 337-9335

Office Telephone #: _____

Facsimile from:

NAME: Jonathan Buck

COMPANY: Advanced Environmental Concepts, Inc.

4400 Ashe Road, Suite 206

Bakersfield, California 93313

FAX Telephone #: 661/831-1771

Office Telephone #: 661/831-1646

[ ]	For your comments	[ ]	As you requested
[ ]	Please call me about this	[ ]	As we discussed
[ ]	Approve, sign, and fax back	[ ]	No response required

The hard copy of this transmittal is [ ] is not [ ] being sent by mail.

FACSIMILE REGARDING: Don: Here is the letter I faxed to Robert Cave. Hard copy will follow in mail. Thanks JB

Advanced Environmental Concepts, Inc.

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

July 26, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"May 2001 Quarterly Groundwater Sampling Report" dated May 27, 2001 was reviewed. Groundwater samples were collected from monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, and MW-8, on May 11, 2001. MW-1 and MW-5 again had the highest constituent concentrations except for methyl tertiary-butyl ether (MTBE), consistent with historical results. MW-1 and MW-5 are within 20 feet of each other. MW-1's concentrations were 20,000 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 2,900 ug/l benzene, 310 ug/l toluene, 1,900 ug/l xylene, 230 ug/l ethylbenzene (BTXE), and <30 ug/l MTBE. MW-5's concentrations were 22,000 ug/l TPH-G, 2,600 ug/l, 480 ug/l, 2,700 ug/l, 220 ug/l BTXE, and <30 ug/l MTBE. MW-2 had the lowest concentrations for TPH-G and MTBE yet found in that well, 720 ug/l and 380 ug/l, respectively. BTXE were within historical ranges. MW-3's concentrations were within historical ranges, 1,900 ug/l TPH-G, 180 ug/l, 12 ug/l, 19 ug/l, <3 ug/l BTXE, and <30 ug/l MTBE. MW-4's concentrations were nondetectable (ND) or nearly ND. Previous concentrations have been ND for all constituents. MW-6's concentration of TPH-G of 610 ug/l was a decrease from the prior quarter. BTXE and MTBE concentrations were consistent with those of the prior quarter. The concentrations were 15 ug/l, 0.97 ug/l, 46 ug/l, <0.5 ug/l, and <0.5 ug/l, respectively. MW-7 and MW-8's concentrations were all ND or nearly ND. Notable changes were decreases of MTBE for MW-7 and MW-8 to 1.1 ug/l and 4.4 ug/l from the prior quarter's 284 ug/l and 620 ug/l, and MW-8's decrease of TPH-G to <50 ug/l from the prior quarter's 1,000 ug/l.

We concur with the recommendation to continue quarterly groundwater sampling. Also, Advanced Environmental Concepts, Inc. (AEC) does not believe that the contamination will mitigate through natural attenuation. Thus, AEC recommends using a vacuum truck to remove the contaminated groundwater from MW-1 and MW-5, and concurrently perform vapor extraction. Submit a remediation workplan for our review.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

TELEPHONES
~~749-6151~~
749-8101

VOGUE® TYRES
DODSON LIMITED
1323 SO. FLOWER STREET • LOS ANGELES, CALIFORNIA 90015

May 10, 2001

MAY 15 2001

Alameda County Health Care Services
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Attn: Don Hwang
Hazardous Materials Specialist

Dear Mr. Hwang:

Thanks for your letter of May 2, 2001 regarding our property at 240 West Mac Arthur Blvd., in Oakland, California. (RO 0000142)

As very much a layman in the area you are an expert, I must admit I don't understand all (or any) of the information you sent me in your report.

I do look at the final recommendation "to continue quarterly groundwater sampling". I do understand that.

My question to you is, when will this end and what can we do to finally get a closure on this project?

I have spent thousands of dollars over many; many years and I don't see any end in sight at this time.

I do trust Jonathan Buck of Advanced Environmental Concepts, but I can't seem to make any headway with him in reaching a closure, nor can I get any suggestions from him as to what more we can do to solve the problem.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 2, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"December 2000 Quarterly Groundwater Sampling Report" dated February 7, 2001 and "Additional Soil and Groundwater Assessment" dated March 2001 by Advanced Environmental Concepts, were reviewed. Groundwater samples were collected from monitoring wells MW-1, MW-2, MW-3, and MW-4 on December 15, 2000. The constituent concentrations reported for MW-1 were 976,000 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 2,490 ug/l benzene, 1,420 ug/l toluene, 10,100 ug/l xylene, 3,640 ug/l ethylbenzene, and <150 ug/l Methyl Tertiary-Butyl Ether (MTBE). The 976,000 ug/l TPH-G reported is questionable since this concentration would exceed its saturation level. The constituent concentrations for MW-2 were 3,020 ug/l TPH-G, 56.7 ug/l benzene, <1.5 ug/l toluene, <1.5 ug/l xylene, <3.0 ug/l ethylbenzene, and 3,040 ug/l MTBE. The constituent concentrations for MW-3 were 5,450 ug/l TPH-G, 445 ug/l benzene, <7.5 ug/l toluene, <7.5 ug/l xylene, 23.8 ug/l ethylbenzene, and 603 ug/l MTBE. MW-4 continued to indicate no detectable concentrations of any of the constituents analyzed.

Four groundwater monitoring wells, MW-5, MW-6, MW-7, and MW-8, were installed on February 13, 2001. The soil sample from MW-5 @ 15' had 11,700 ppm TPH-G at 15 feet below ground surface (bgs). The elevated TPH-G concentration may be attributable to the soil sample being from the capillary fringe since the depth to groundwater was at 16.36 feet. Soil samples from MW-6, MW-7, and MW-8, were below detection limits for all constituents with the exception that a sample from MW-8 had a small amount of MTBE. MW-5, MW-6, and MW-8, exhibited elevated TPH-G concentrations, 5,660 ug/l, 1,340 ug/l, and 1,000 ug/l, respectively. MW-7, which is downgradient and offsite, was nondetectable for all constituents with the exception of MTBE, which was 284 ug/l.

We concur with the recommendation to continue quarterly groundwater sampling. We will be awaiting the results of the next round of groundwater sampling and recommendations based on the results. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang

Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

Advanced Environmental Concepts, Inc.

FAX COVER SHEET

We have 4 page(s) to send, plus cover page.

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Facsimile sent to:

DATE: 1/15/01

TO: Alameda County Env Health

ATTN: Mr. Don Hwang

FAX Telephone #: (510) 337-9335

Office Telephone #:

Facsimile from:

NAME: Jonathan Buck

COMPANY: Advanced Environmental Concepts, Inc.

4400 Ashe Road, Suite 206

Bakersfield, California 93313

FAX Telephone #: 661/831-1771

Office Telephone #: 661/831-1646

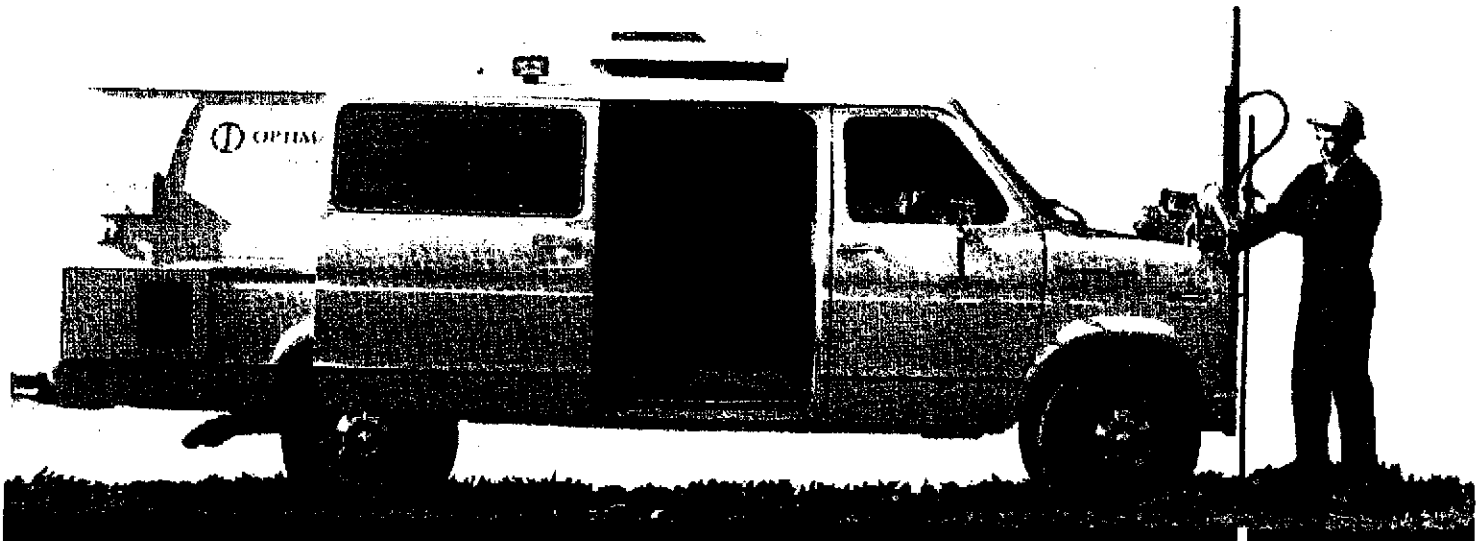
[ ]	For your comments	[ ]	As you requested
[X]	Please call me about this	[X]	As we discussed
[ ]	Approve, sign, and fax back	[ ]	No response required

The hard copy of this transmittal is [ ] is not [X] being sent by mail.

FACSIMILE REGARDING: Don: The soil-gas survey is tentatively scheduled for ~~Thursday JAN~~ 18, 2001 (ALL DAY!) It is my estimate that we will be able to obtain a minimum of 30 data points. The focus will be in Howe street, Kaiser Hospital, and both lateral directions from MW-1. Thanks Jon Buck

Optimal Technology

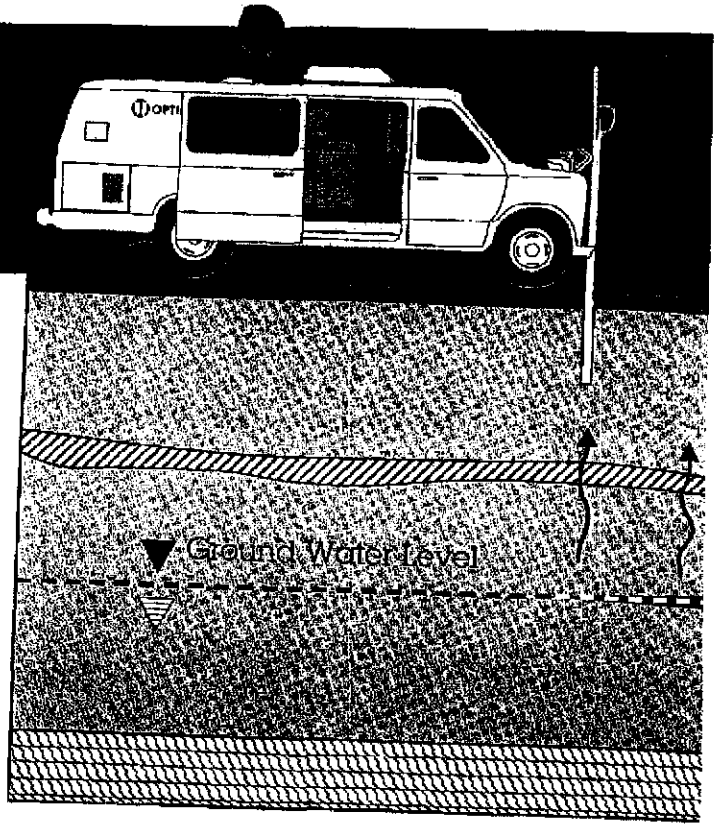
Specializing in Environmental Field Services



Specialty Field Services

- Soil Gas
- Mobile Laboratory

Optimal Technology



Optimal Technology (Optimal) offers state-of-the-art soil gas technology employing on-site laboratory grade instrumentation. Optimal's soil gas testing services provide reliable, professional, and near real time analytical data acquisition to support environmental field activities.

Optimal's soil gas testing services offer a rapid investigatory tool for environmental investigations, including:

- contamination source identification
- optimizing well and boring locations
- site evaluations for real-estate transactions
- assesing contaminant plumes
- evaluating leakage from underground storage tanks and pipelines
- monitoring landfill emissions
- assessing the performance of in-situ remediation

Why Soil Gas?

Soil gas testing is a cost effective alternative to traditional methods of volatile organic compound (VOC) detection. VOC's include many motor fuels, industrial solvents, and landfill emissions.

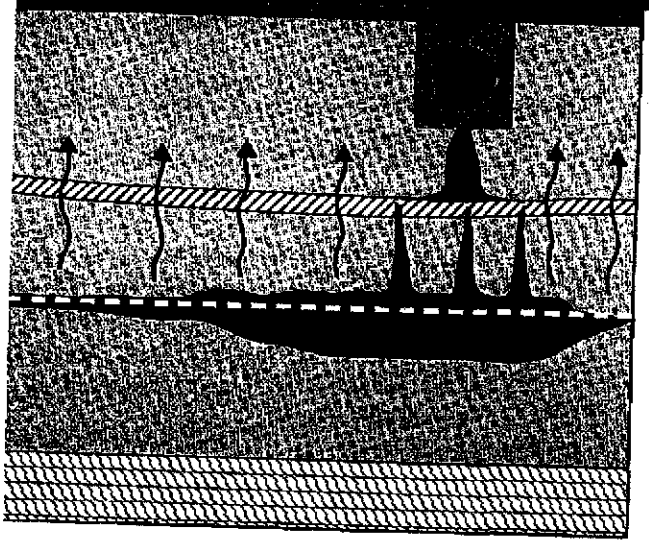
The conventional approach of ground water well drilling, installation, development, sampling, and laboratory analysis, can be a lengthy and costly process, especially if resampling is required. Soil gas testing minimizes these problems. When used during initial stages of a site investigation, soil gas sampling and analysis can optimize selection of boring and well locations by rapidly screening for VOC's in the subsurface.

Why On-Site Analysis?

On-site analysis and active sampling provide greater analytical sensitivity and reproducibility. Soil gas sample degradation can occur during shipment to a laboratory, especially at the low contaminant concentrations encountered during soil gas surveys.

Active sampling, where soil gas is extracted from a specified depth, offers better reproducibility and flexibility than passive sampling methods, which rely on burial of VOC absorption devices over long periods of time.

On-site analysis also reduces the turnaround time between soil gas sampling and receipt of analytical results. Sampling and analytical errors are detected in the field. This reduces the need for re-sampling and re-analysis, improves quality assurance, and eliminates additional mobilization costs. The rapid turnaround time enables the investigator to make informed near real time decisions in the field.



Optimal Technology Services

Optimal Technology provides the investigator with laboratory grade analytical capabilities for soil gas sampling and analysis in a near real time framework. Optimal's capabilities include:

- On-site analysis and sampling.
- Field vans equipped with the same analytical instrumentation used by EPA Contract Laboratories.
- A data deliverables package that presents analytical results and quality assurance parameters in a clear and concise format.

Instrumentation Optimal's field vans have gas chromatographs equipped with flame-ionization, photo-ionization, thermal conductivity, electron-capture detectors, and a chromatographic data handling system. Air sampling equipment and a hydraulic sampling probe emplacement system mounted on the van complement the analytical instrumentation. Dual electric generators deliver self-sufficiency to the mobile van in the field.

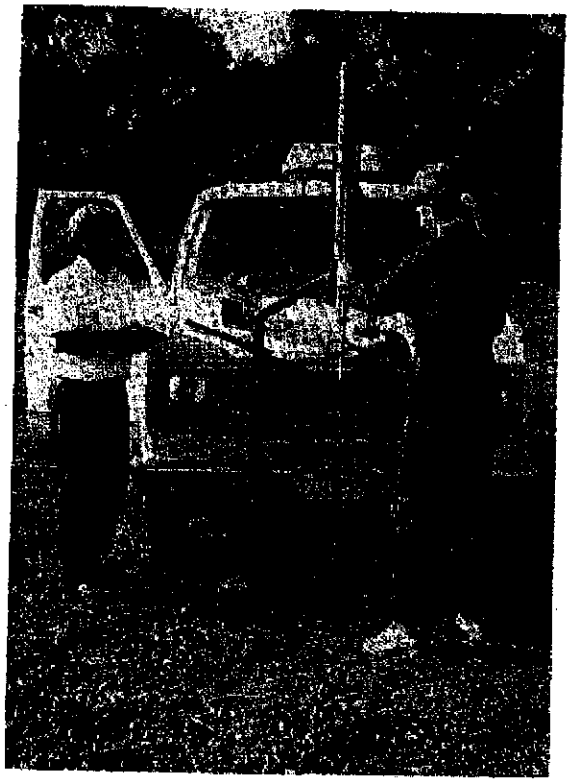
A hammer drill for penetrating concrete/asphalt covering allows Optimal Technology to provide single vendor responsibility.

Data Reports Optimal Technology produces analytical and quality assurance data reports that include two-dimensional soil gas concentration contour maps. The maps provide a visual tool to help recognize the source of significant contaminates. This is an added benefit, uniquely provided by Optimal Technology (see figure on the back cover).

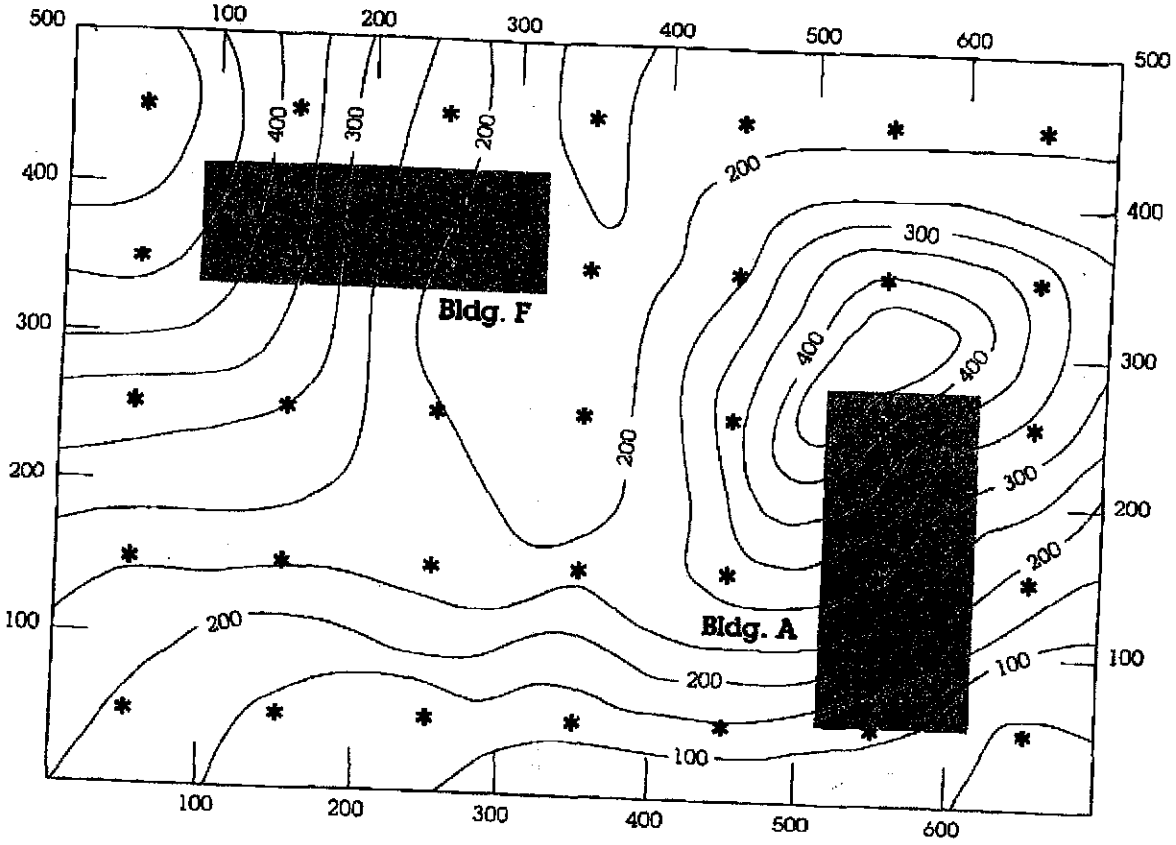
Optimal Professionals. Experienced, knowledgeable and courteous personnel enable Optimal Technology to offer a superior level of soil gas testing service quality.

For further information on Optimal Technology's services, please call us toll free at:

(877) SOIL GAS
(877) 764-5427



Computer Generated Soil Gas Contours



Optimal Technology
P.O Box 4448
Chatsworth, CA 91313
(877) SOIL GAS
(877) (764-5427)

Advanced Environmental Concepts, Inc.

FAX COVER SHEET

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If you need a re-send on any of the pages please call the number listed below within 15 minutes. If we do not hear from you, we will assume that all pages were received.

Facsimile sent to:

DATE: 1/2/01

TO: Alameda County

ATTN: Don Hwang

FAX Telephone #: (510) 337-9335

Office Telephone #: (510) 567-6700

Facsimile from:

NAME: Jonathan Buck

COMPANY: Advanced Environmental Concepts, Inc.

4400 Ashe Road, Suite 206

Bakersfield, California 93313

FAX Telephone #: 661/831-1771

Office Telephone #: 661/831-1646

[ ]	For your comments	[ ]	As you requested
[ ]	Please call me about this	[ ]	As we discussed
[ ]	Approve, sign, and fax back	[ ]	No response required

The hard copy of this transmittal is [ ] is not [ ] being sent by mail.

FACSIMILE REGARDING: Don: Please review QA/QC and respond, if adequate.

Thanks JB

OPTIMAL TECHNOLOGY
Specializing in Environmental Field Services

STATEMENT OF QUALIFICATIONS

INTRODUCTION

Optimal Technology is an environmental field services company and since 1990 has been specializing in field chemistry services with a strong emphasis on soil vapor testing. Soil vapor testing has gained wide acceptance in the environmental marketplace as a rapid, reliable and cost effective method of screening for volatile organic compounds (VOCs) in the subsurface. Soil vapor surveys are designed to provide both timely and valuable data, enabling the field investigator to assess the distribution of VOCs in the subsurface.

Optimal Technology's qualified personnel and on-site laboratory grade instrumentation offers state-of-the-art soil vapor sampling and testing as well as soil sampling. These services provide reliable, professional, and near real-time analytical data in support of most environmental field activities. Optimal Technology adheres to stringent quality assurance, ensuring the delivery of an effective soil vapor survey.

SOIL VAPOR SERVICES

Optimal's soil vapor testing services offer a rapid, yet reliable screening tool for environmental investigations. On-site soil vapor testing has proven to be a cost effective alternative to the traditional methods of volatile organic compound detection in the subsurface. When used during the initial stages of a site investigation, soil vapor sampling and analysis can quickly gather meaningful data that can be used by the investigator to guide future phases of an investigation.

APPLICATIONS

Site Evaluations for Real Estate Transactions

Today's real estate market requires environmental site assessments of commercial and industrial properties prior to transfer. Optimal Technology's soil vapor services improve the efficiency of a site investigation by rapidly gathering meaningful data over a large area in a short period of time. Soil vapor surveys can quickly evaluate property boundaries and suspected "hot spots" to indicate the presence of VOC contamination on-site in both ground water and soils. This cost effective screening technique complements other site assessment activities where contamination by VOCs is of concern.

Optimizing Well and Soil Boring Locations

The conventional process of drilling, sampling and laboratory analysis is costly, obtrusive, and time consuming when compared to soil vapor sampling with on-site analysis. Whereas conventional drilling will provide a few data points over a substantial period of time, Optimal Technology's soil vapor services can collect and analyze approximately 25 or more samples per day, depending on site conditions. By rapidly obtaining knowledge of the subsurface distribution of VOCs, the investigator will be able to optimize both well and soil boring locations. This eliminates unnecessary drilling and limits the collection of uninformative data.

Contaminant Plume Mapping

Soil vapor surveys have been successfully used to map VOC contaminant plumes in ground water at depths in excess of two hundred feet below ground surface. Since the spatial distribution of VOCs (two-dimensional) in the subsurface is reflected in the soil vapor data, soil vapor surveys can illuminate plume boundaries and areas of maximum VOC concentrations in the subsurface.

Contaminant Source Identification

Optimal Technology employs soil vapor testing to locate potential contamination source points. In areas where numerous VOC contamination sources are probable, soil vapor testing is capable of identifying individual contamination points. Vertical profiling is offered by Optimal Technology as a means for distinguishing between contamination stemming from shallow soils or from ground water. This is a useful application, when sources are unknown or contamination originates from multiple sources over a given site. One major advantage of Optimal's soil vapor services compared to most others is the capability of identifying and quantifying individual compounds.

Underground Storage Tank and Pipeline Leak Evaluation

Optimal Technology incorporates soil vapor to evaluate leaks from underground storage tanks and pipelines containing VOCs by tracing product plumes back to the leak point. This is not a leak detection technique, but a method to locate the lost product and the leak point. This technique may be able to identify multiple leak points along buried pipelines where standard testing techniques (volumetric, pressure, etc.) indicate that a leak is present without yielding the location or number of leak points.

Evaluating Landfill Vapors

Optimal Technology can assist the evaluation of landfill emissions of VOCs by collecting and analyzing in-situ landfill vapor samples. These samples call be analyzed for VOCs and gross air constituents including oxygen, nitrogen, carbon dioxide, carbon monoxide, and methane. In addition to assessing the presence of VOCs in tile landfill, this information can be used to estimate landfill age, activity and boundaries.

Assessing the Performance of In-Situ Remediation

Soil vapor surveys have been recognized as a means to evaluate the effectiveness of in-situ remediation. Optimal Technology has employed soil vapor testing for measuring volatile hydrocarbon concentrations including Benzene, Toluene and Xylenes. By collecting samples over a given period of time from sampling points influenced by in-situ hydrocarbon treatment systems, an indication of the system's proficiency and the radius of effectiveness can be evaluated.

SOIL VAPOR SURVEY SAMPLING AND ANALYTICAL PROTOCOL

EQUIPMENT AND INSTRUMENTATION

Optimal Technology's soil vapor sampling and analysis mobile laboratories are designed for self-sufficiency in the field. Each van provides its own electric power for the hydraulic probe emplacement system and analytical instrumentation. This analytical instrumentation is laboratory grade and is supported by a computer driven chromatographic data collection system.

Vehicle

- Customized One Ton Ford Econoline Extended Van
- Front Mounted Hydraulic Probe Driving and Removal System
- Dual Electric Generators and Customized Electric Power System
- Rotary Impact Hammer for Asphalt/Concrete Penetration
- Soil Vapor Sampling Pump (and Back Up)
- Standards Refrigerator
- Steel Soil Vapor Probes
- Probe Decontamination Equipment
- Safety Equipment: Fire Extinguisher, First Aid, and Personal Protective Equipment for low level HAZMAT
- Exterior Halogen lamps for Working in Reduced Lighting

Analytical Instrumentation

- Laboratory Grade Gas Chromatograph (Hewlett Packard 5890 Series II)
- PC with Intel Pentium Processor
- Chromatographic Data System (Hewlett Packard Chemstation)
- Detectors: Flame ionization (FID), Electron Capture (ECD), Photoionization (PID), and Thermal Conductivity (TCD)
- EPA Priority Pollutant Traceable Standards
- Standards and Equipment Log Books
- Packed and Class Capillary Analytical Columns
- Carrier and Detector Gases (Nitrogen, Hydrogen, and Air)

SAMPLING PROCEDURE

Sampling is performed by hydraulically pushing 1/2" galvanized steel soil gas probes to a depth of 5.0-10.0 feet bgs or more. An electric rotary hammer drill is used to drill a 1.0 inch hole through any overlying concrete/asphalt to allow probe placement when required. The same electric hammer drill can be used to push probes in areas of resistance during placement.

At each sampling location an electric vacuum pump (set to draw 2 liters/min of soil vapor at a maximum vacuum of 100" of water) is attached to the probe and purged prior to sample collection. Vapor samples are obtained in Hamilton gas-tight syringes by puncturing silicone tubing which connects the sampling probe and the vacuum pump. New silicone tubing is used at each sampling point to prevent cross contamination. Samples are immediately injected into the gas chromatograph after collection. New sampling probes are used after each sample with positive results. Equipment blanks using ambient air are collected throughout the day. If significant contamination is detected in these blanks, corrective actions would be taken to identify and eliminate the source, if possible.

All analyses are performed on a laboratory grade Hewlett Packard model 5890 Series II gas chromatograph equipped with a Photo Ionization Detector (PID)/Flame Ionization Detector (FID) and an Electron Capture Detector (ECD). Restec wide bore capillary columns using nitrogen and hydrogen as the carrier gases are used to perform all analysis. All results are collected on a personal computer utilizing Hewlett Packard's PC based chromatographic data collection and handling system.

QUALITY ASSURANCE

Optimal Technology operates under strict quality assurance protocols that emulate EPA testing requirements for analyses of volatile organic compounds via EPA Testing Methods 601 or 602, where applicable in accordance with U.S. Environmental Protection Agency *Methods for Chemical Analysis of Water and Wastes.* Optimal Technology is approved by the Los Angeles Regional Water Quality Control Board (LARWQCB) and follows all applicable standards of testing.

3-Point Calibration

An initial 3-point calibration is performed on each day of sampling by preparing a calibration solution from a pre-mixed standard supplied by Supelco, Inc. The standard contains 19 common halogenated solvents and 11 aromatic hydrocarbons (see Table 1). The individual compound concentrations in the standards ranges between 0.025 ng/ul and 0.25 ng/ul.

The initial three point calibration consists of 20, 100 and 500 ul injections of the calibration solutions. A calibration factor on each analyte was generated using a best fit line method using the HP data system. If the r^2 factor generated from this line was not greater than 0.990, an additional three point calibration would have been performed. Method detection limits were calculated to be 1.0 ug/L for the individual compounds

Sample Replicates

A replicate analysis (duplicate) is run when concentrations exceed the calibrated range of the instrument/detector being used. The duplicate sample is diluted using a smaller injection volume to assure that the instrument response falls within 50% of the calibrated range. In addition, a duplicate analysis is run a minimum of once each day to evaluate the reproducibility of the sampling system and instrument. If the difference between samples varies more than 20%, the entire system is evaluated and the inconsistency is determined and corrected, if possible.

Equipment Blanks

Blanks are run at the beginning of each workday, after calibrations and whenever sampling conditions appear to change. New vapor probes are used following each sample with positive results or when probes were damaged during installation. The blanks are collected using an ambient air sample. These blanks checked the septum, syringe, GC column, GC detector and the ambient air.

DATA DELIVERABLES

Optimal Technology's chromatographic data system efficiently produces customized data packages. The standard deliverable package offered by Optimal Technology includes the analytical results, the daily log, the run log, the quality assurance data and a contoured map of the sampling points. The analytical results are presented for each analyte at each sampling location in tabular format. The daily log will contain a description of each sampling point detailing field activities performed in the field including the quality assurance analyses. The quality assurance data is comprised of the initial calibration curve (3-point) for each analyte encountered, the instrument response, the continuing calibration checks, the duplicates, the field blanks, and the equipment blanks. The two-dimensional contoured map will include all sampling points and approximate contaminate plume size and direction of migration.

TABLE 1

Acetone
Benzene
2-Butanone (Methyl Ethyl Ketone, MEK)
Carbon Tetrachloride
Chlorobenzene
Chloroethane (Ethyl chloride)
Chloroform
Cyclohexane (Hexahydrobenzene)
Dichlorodifluoromethane (Freon 12)
1,1-Dichloroethane (DCA)
1,2-Dichloroethane
1,1-Dichloroethene (DCE)
cis-1,2-Dichloroethene
trans-1,2-Dichloroethene
Ethylbenzene
4-Methyl-2-Pentanone
Methylene Chloride (Dichloromethane)
1,1,1,2-Tetrachloroethane
1,1,2,2-Tetrachloroethane
Tetrachloroethene (PCE)
Toluene
1,1,1-Trichloroethane (TCA)
1,1,2-Trichloroethane
Trichloroethene (TCE)
Trichlorofluoromethane (Freon 11)
Trichlorotrifluoromethane (Freon 113)
Vinyl Chloride
m/p-Xylene
o-Xylene
Methane (upon request)

NSMIT REPORT

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Alameda County Environmental Health

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

FACSIMILE COVER SHEET

TO: JON BUCK

FROM: DON HWANG 510/567-6746

DATE: 12/28/00

Total number of pages including cover sheet 2

-NOTES-

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
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Total number of pages including cover sheet 2

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upon of

3. Describe soil types and soil strata encountered in excavation(s).

4. Provide in tabular form the analytic results of all previous soil and water sampling. The location of these samples should be included on the site map. The date sampled, the identity of the sampler, and signed laboratory data sheets need to be included. The laboratory data sheets must include the laboratory's assessment of the condition of samples upon receipt, including: a) temperature, b) container type, c) air bubbles present/absent in VOA bottles, d) proper preservation, and e) any other relevant information which might affect the analytic results of the sample(s).

5. Identify underground utilities.

6. Describe any unusual problems encountered during excavation or tank removal.

7. Describe in detail the methods used for storing, characterizing, and disposing of all contaminated soil and groundwater.

8. Reference all required permits, including those issued by the Air Quality Management District and local underground tank permitting agency and public encroachment permits when drilling offsite..

III. Plan for determining the extent of soil contamination on site.

A. Describe the method/technique(s) proposed for determining the extent of contamination within the excavation.

B. Describe sampling methods and procedures to be used.

1. If soil gas survey is planned, then:

a. Identify number of boreholes, location (on site map), sampling depth, etc...

b. Identify subcontractors, if any

c. Identify methods or techniques used for analysis

d. Provide quality assurance plan for field testing

Please note that soil gas surveys are not considered to

Advanced Environmental Concepts, Inc.
4400 Ashe Road, Suite #206
Bakersfield, CA 93313
(661) 831-1646 FAX (661) 831-1771

A FAX FROM AEC

TO: Don Hwang Alameda County Health Care Services	FROM: Jonathan Buck
FAX: (510) 337-9335	DATE: December 26, 2000
PHONE:	PAGES: 1
RE: Vogue Tyres - Stld 6059	CC:

[ ] Urgent [X] For Review [ ] Please Comment [ ] Please Reply [ ] As we discussed

Don,

Attached please find AEC's Soil Gas Sampling Protocol for your review.

We look forward to performing the soil gas sampling in early January.

If you should have any questions, please do not hesitate to contact our office at (661) 831-1646.

Thank You,

Jon

DEC 26 2000

4.2.2.2 Soil Gas Sampling

Soil gas sampling will be conducted by Optimal Technology, Inc. of Carpinteria, California. A description of the sampling procedures is provided below.

Probe Insertion: Stainless-steel probes equipped with hardened reverse-threaded steel tip and dedicated polypropylene conductor tubing will be driven into the ground using a rotohammer, or other direct push device. The probe rods will be advanced to the desired sampling depth of 5 and 10 feet bgs, and turned clockwise to open the tip and expose the vapor sampling ports.

Purge Testing: Purge testing will be conducted at the beginning of the soil gas investigation to evaluate the appropriate purge volume for the probes in accordance with LARWQCB WIP protocol. At least three purge volumes of air will be removed from each probe prior to sampling being initiated. Purge flow rates prior to vapor sample collection will be set as low as practical (i.e.,most likely equal to or less than 250 milliliters per minute (ml/min).

Sample Collection: Following removal of the appropriate purge volume, soil gas samples will be collected in either a 125-ml glass sample bulb or a glass barreled syringe. The samples will be collected by puncturing the silicone hose attached to the top of each probe and withdrawing a sample at a rate of 250 ml/min or less. The samples will be immediately transferred to the mobile laboratory for direct injection into a gas chromatograph for analysis in accordance with the LARWQCB WIP Guidance procedures, which are consistent with EPA Methods 8260B and 8021. The gas samples will not be in contact with any potentially sorptive materials. Once sampling has been completed, the probe will be removed from the hole and backfilled with hydrated granular bentonite.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

December 15, 2000

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
StId 6059

"Additional Groundwater Assessment Workplan" dated October 2000 from your consultant, Jonathan Buck of Advanced Environmental Concepts, was reviewed. It is approved.

Please have your consultant notify me of their schedule for the work at the site ahead of time so that I may have the option to be present. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

ec
C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

ADVANCED ENVIRONMENTAL CONCEPTS INC

October 9, 2000

Mr. Don Hwang
Alameda County Health Care Services Agency
Environmental Health Services
1131 Habor Bay Parkway, Suite #250
Alameda, CA 94502-6577

Regarding: **Additional Groundwater Assessment Workplan**
Vogue Tyres
240 W. McArthur Blvd.
Oakland, California
Stld 6059

Dear Mr. Hwang:

Please find enclosed the Additional Groundwater Assessment Workplan prepared by **Advanced Environmental Concepts, Inc.** (AEC) for the above referenced project/location.

Enclosed please find that report, which AEC is submitting for your review.

Should you have any questions or require clarification on any aspects of the enclosed, please do not hesitate to contact our office at (661) 831-1646.

Respectfully yours,

Advanced Environmental Concepts, Inc.

Debbie Irwin
Project Coordinator / Office Administrator

Attachments: Reports (1)

cc: Mr. Warren Dodson

4400 Asne Road Suite 206
Bakersfield, California 93313
advanced@lightspeed.net
Phone: (661) 831-1646
Fax: (661) 831-1771

Advanced Environmental Concepts Inc.

Fax

To:

Fax:

Phone:

Re:

Urgent

ENVIRONMENTAL PROTECTION

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■ ADVANCED ENVIRONMENTAL CONCEPTS INC ■

May 30, 2000

Mr. Don Hwang
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: **Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611**
StID 6059

Dear Mr. Hwang:

Advanced Environmental Concepts, Inc. (AEC) has received your letter dated May 16, 2000 regarding Vogue Tyres, 240 W. MacArthur Boulevard, Oakland, CA. AEC respectfully submits the following comments regarding your letter.

1) It is still the opinion of AEC that the hydrocarbon concentrations in groundwater will oscillate based on seasonal changes and that the plume is exhibiting stability. AEC agrees that quarterly monitoring needs to be continued and will schedule a date for mid-June to conduct the sampling and have an opportunity to meet you on-site.

2) AEC agrees that the contaminants may have migrated offsite and our client (Mr. Warren Dodson) is willing to conduct additional subsurface investigation to identify the full extent of the plume. However, prior to initiating the investigation, Mr. Dodson wants a clear understanding as to what target hydrocarbon concentrations for TPH-gasoline, BTXE and MTBE need to be achieved to obtain a "no further action" letter. Also, it will be helpful if your department would identify whether the "perched" groundwater is classified as low risk, moderate risk, or a high risk water bearing zone.

The remaining points brought up in your letter can all be adequately assessed during an additional offsite subsurface investigation and will be defined prior to drilling within a detailed work plan.

It is also the understanding of AEC, that once the plume is adequately evaluated, regarding the lateral and vertical extent, a determination for future mitigation will be discussed and potentially could include a "no further action" resolution. Mr. Dodson is motivated to obtain closure for this site; therefore, AEC and Mr. Dodson look forward to completing this project in a time efficient and cost-effective manner.

We look forward to meeting you in June. If you should have any questions, please do not hesitate to contact our office at (661) 831-1646.

Sincerely,

Advanced Environmental Concepts, Inc.

Jonathan L. Buck
President

c: Mr. Warren Dodson

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 16, 2000

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
StId 6059

The letter dated December 3, 1999 from your consultant, Jonathan Buck of Advanced Environmental Concepts was reviewed. We disagree with the recommendation for closure for this site for the following reasons:

1) Contrary to Mr. Buck's statement that "Quarterly sampling has shown that the contaminants are generally degrading passively...", groundwater contamination doesn't appear to be attenuating. Instead, Total Petroleum Hydrocarbons as Gasoline (TPH-G) has increased in MW3 from the last sampling on January 19, 1999, compared to the previous quarter, October 19, 1998. Benzene has increased from the last sampling on January 19, 1999, compared to the previous quarter, October 19, 1998 in MW1, MW2, and MW3. Methyl Tertiary-Butyl Ether (MTBE) has increased in MW1 and MW3 with MTBE as high as 2,100 ug/l, and MTBE is not decreasing in MW2. He attributes the spikes of elevated concentrations to seasonal precipitation changes. This trend is not readily apparent when groundwater contaminant concentrations are compared to sample dates.
Therefore, quarterly groundwater monitoring needs to be continued until the plume has stabilized as indicated by decreases or no change in the concentrations of contaminants. Although passive bioremediation is the usual remedial alternative, more aggressive active remediation may be proposed.

2) Additionally, the increasing contaminant concentrations may indicate that the contaminant plume may have migrated off site. Therefore, further delineation and characterization of the plume is required. A perched lens consisting of a less permeable clayey silt and a water-bearing zone that was 3 feet thick was not apparent from a review of the boring logs. Even if these statements were true, only the vertical extent of contamination would be limited but not the horizontal extent. Also, in order for the water source to be of insufficient volume for municipal or domestic use, Regional Board Resolution No. 89-39,"Sources of Drinking Water" states that it must not be capable of supplying a single well with an average sustained yield of 200 gallons per day.

3) Concentrations of Methyl Tertiary-Butyl Ether (MTBE) in groundwater beneath the site were as high as 2,100 ug/l. The Regional Water Quality Control Board is currently not closing any sites with MTBE concentrations exceeding 200 ug/l.

4) The benzene concentration of 1,200 ppb found in the most recent groundwater monitoring sample collected on January 19, 1999 exceeded the human health protective threshold value of 214 ppb for a 1/100,000 risk at a commercial site, per the Tier 1 Table of the American Society for Testing and Materials' Risk Based Corrective Action Guidelines (ASTM RBCA E 1739-95). Unless it can be shown that the groundwater-vapor intrusion from groundwater to buildings and the groundwater volatilization to outdoor air exposure pathways are limited, the benzene concentrations must be evaluated.

5) The next round of groundwater monitoring needs to include analyses for additional oxygenates and additives, specifically, ether oxygenates: Tertiary Amyl Methyl Ether (TAME), Diisopropyl Ether (DIPE), Ethyl Tertiary Butyl Ether (ETBE); Tertiary Butyl Alcohol (TBA); lead scavengers: Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) [(1,2-Dichloroethane) (1,2-DCA)]. Future analyses need not include any of these constituents not found in the next round of groundwater monitoring.

6) The presence or absence of horizontal and vertical conduits which could act as preferential pathways for the dissolved plume needs to be evaluated.

7)Lastly, "Phase 2 Subsurface Investigation Report" dated February 14, 1997 by All Environmental, Inc., tabulated Polynuclear Aromatic Hydrocarbons (PNA's) concentrations in soil sampled January 1997, for all six borings in Table 1, on page 3. These concentrations for PNA's in soil were as high as 41 mg/kg. However, the "Chain of Custody Record" showed that PNA analyses were only requested for BH2,L3-15'; BH3,L3-15'; and BH2W. These concentrations for PNA's were all NonDetectable (ND). Hence, the PNA concentrations in the report differed from those reported by the laboratory. Explain the discrepancy.

Provide a workplan to address the items listed. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

STID 6059

■ ADVANCED ENVIRONMENTAL CONCEPTS INC ■

December 3, 1999

Ms. Juliet Shin
Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Vogue Tyres
240 West MacArthur Boulevard
Oakland, California

99 DEC 22 PM 4:17

Dear Ms. Shin:

Advanced Environmental Concepts, Inc. (AEC) is pleased to present this reply to your letter of October 27, 1999.

First, the PNA's that were reported in soil samples identified as BH-1-15' through BH-6-15' were identified in concentrations ranging from 0.27 mg/kg to 41 mg/kg. BH2W was the only "grab" water sample analyzed for PNA's and exhibited "ND" concentrations. These borings (BH-1 through BH-6) and "grab" groundwater samples (BH1W, BH2W, BH4W, and BH6W) were part of a previous investigation conducted by All Environmental, Inc. (AEI) on January 8, 1997. AEC conducted our investigation from August 7-8, 1997 and consisted of drilling three additional geoprobe borings and installing four dedicated groundwater monitoring wells. AEC did not analyze our soil, or groundwater samples, for PNA's.

Second, it does appear that the groundwater contamination was a direct result of the installation and use of the underground storage tanks located in the northern portion of the property adjacent to Howe Street. However, the contamination that exists in the capillary fringe, and water-bearing zone, is residual. The primary source, and majority of the secondary source of contamination, has been removed. The water-bearing zone is in a sandy\gravel that occurs between 19 feet and 22 feet below grade level (bgl) and is "perched" on a less permeable clayey silt. The soil samples collected from the shallow subsurface between 5 feet and 17 feet bgl exhibit non-detectable to trace concentrations of volatile aromatics at concentrations that do not present a human health concern. The elevated concentrations of gasoline-range hydrocarbons primarily exist in the water-bearing zone, which also provides the impetus for contaminant movement (the groundwater flow direction has been generally calculated to the northwest). AEC realizes that the gasoline contaminated water exceeds standards established by the San Francisco Bay RWQCB, and is a Tier 1 classified risk (benzene in MW-1), however, this water-bearing zone only has a thickness of 3 feet, is of insufficient volume to be of potable, or industrial use, and does not appear to be in continuity to confined water-bearing zones at greater depths. Quarterly sampling has shown that the contaminants are generally degrading passively; the spikes of elevated concentrations are probably a result of seasonal precipitation changes versus from a continuing LUST source. Also, the majority of impacted soil was removed with the USTs. It does not seem justified, in this case, to go further with continued quarterly monitoring, or additional downgradient groundwater investigation. The groundwater contamination will passively degrade over time, also, because volatile range hydrocarbons are not encountered prior to 12 feet bgl, there is limited possibility that workers will physically encounter the gasoline

• ENVIRONMENTAL CONCEPTS WITH DESIGN IN MIND •

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impacted zone, or that vapors will have the potential to migrate into sensitive receptor areas. AEC, once again, recommends closure for this site.

Thank you for your time and consideration.

Sincerely,

Advanced Environmental Concepts, Inc.

Jonathan L. Buck
Senior Geologist

cc: Mr. Warren Dodson
Mr. Lew Vaught

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

October 27, 1999

Mr. Warren Dodson
Dodson Ltd.
1323 South Flower Street
Los Angeles, CA 90015

STID: 6059
Re: Investigations at 240 West MacArthur Blvd., Oakland, CA 94611

Dear Mr. Dodson,

I, Juliet Shin, have been designated as the new caseworker for the above site. Based on my review of the case files, it was determined that additional investigations will be required at the site.

In February 1991, a magnetometer survey, conducted by Mittelhauser Corporation, identified a large magnetic anomaly in the northwestern portion of the above site and a 350-gallon waste oil underground storage tank (UST) at the southern end of the site. The waste oil UST was subsequently removed from the site in October 1996. Two soil samples collected from the bottom of the tank pit at 7- and 8-feet below ground surface (bgs) were analyzed for Total Petroleum Hydrocarbons as diesel (TPHd), Total Oil & Grease (TOG), Methyl Tertiary Butyl Ether (MTBE), total lead, Semi-Volatile Organic Compounds (SVOCs), and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Analysis of these two samples identified up to 510 parts per million (ppm) TPHd and 7,000ppm TOG. Consequently, the tank pit was overexcavated down to 9-feet bgs, and five additional soil samples were collected from the excavation (SW1 through SW4 were collected from the four sidewalls of the excavation at 8.5-feet bgs; and one soil sample, EB, was collected from the bottom of the excavation at 9-feet bgs.) These soil samples were analyzed for the same constituents as above, with the addition of TPH as gasoline (TPHg). Analysis of these samples only identified low levels of TPHd and metals below threshold values.

Site Summary

In January 1997, six borings (BH-1 through BH-6) were advanced at the site to assess both soil and groundwater contamination at the site. One soil sample was collected from each of the borings at 15-feet bgs, and analyzed for the same constituents as above. Soil samples collected from the borings placed around the large magnetic anomaly in the northwestern corner of the site (BH-4 through BH-6) were the only borings to identify TPHg, TPHd, and BTEX contamination. Additionally, according to the February 14, 1997 Subsurface Investigation report, SVOCs were also identified in all of the six soil samples. "Grab" groundwater samples were collected from borings BH-1, BH-2, BH-4, and BH-6. The groundwater samples collected from borings BH-1, BH-4, and BH-6 identified elevated levels of TPHg, TPHd, MTBE, and benzene. The highest concentrations were noted in boring BH-6, located adjacent to the magnetic anomaly and the former Gulf Service Station gasoline UST locations at the northern end of the site.

In August 1997, three additional borings (BH-7 through BH-9) and four groundwater monitoring wells (MW-1 through MW-4) were drilled at the site to further delineate the observed soil and groundwater contamination. Well MW-4 was placed as the upgradient well to determine whether there was any contamination coming from the Shell Service Station, located south of the site. Two soil samples were collected from each of the three borings and four monitoring wells and analyzed for TPHg, TPHd, and BTEX. Only low levels of TPHg and BTEX were identified in these soil samples. Analysis of the groundwater samples collected from the four monitoring wells identified elevated levels of TPHg and BTEX in Wells MW-1 through MW-3, located in the vicinity of the former Gulf Service Station gasoline USTs.

To date, the monitoring wells have been monitored in 08/97; 12/97; 3/98; 07/98; 10/98; and 01/99. Contaminant concentrations in these wells do not appear to be significantly attenuating, and rather, levels of TPHg and benzene appear to be increasing in Well MW-1, and levels of MTBE appear to be increasing in Wells MW-2 and MW-3. Concentrations of MTBE in groundwater beneath the site are currently as high as 2,100 parts per billion (ppb). The San Francisco Bay-Regional Water Quality Control Board (RWQCB) is currently not closing any sites with MTBE levels exceeding 200ppb. The benzene level most recently identified in Well MW-1 is currently exceeding the human-health protective threshold value of 740ppb for a 10^{-5} risk at a commercial site, per the Tier 1 Table of the American Society for Testing and Materials' Risk Based Corrective Action Guidelines (ASTM RBCA E 1739-95).

The identified soil and groundwater contamination appears to be resulting from your site, and unless it can be proven otherwise, you will be required to continue quarterly groundwater monitoring at the site. The next round of groundwater monitoring should be conducted within 45 days of the date of this letter, and must include the analysis for the following fuel oxygenates and lead scavengers using Methods 8260 and 8010: **Tertiary Amyl Methyl Ether (TAME), Diisopropyl Ether (DIPE), Ethyl Tertiary Butyl Ether (ETBE), Tertiary Butyl Alcohol (TBA), Ethylene Dibromide (EDB), and Ethylene Dichloride (EDC).** If these constituents are not identified in the next sampling event, further analysis for these constituents will not be necessary.

Additionally, based on the fact that the contaminant concentrations are increasing in the downgradient wells at the site, it appears that the contaminant plume may have migrated off site. Therefore, this office is requiring further delineation and characterization of the plume. **A workplan addressing further delineation of the contaminant plume should be submitted within 45 days of the date of this letter (i.e., by December 08, 1999).** Any requests for extensions of the due date, or modifications of the required work, should be submitted in writing.

Lastly, per Table 1 in the February 14, 1997 Phase II Subsurface Investigation Report, SVOCs (a.k.a. PNAs) were identified in the soil samples collected from borings BH-1 through BH-6, however, the laboratory analyticals attached to the report did not indicate that any PNAs were identified. Was this a typo? If PNAs were, in fact, identified in the soil samples, future groundwater analysis should include PNAs.

The State Water Resources Control Board manages an Underground Storage Tank Cleanup Fund (Fund) to help eligible Responsible Parties to obtain reimbursement for costs of investigating and remediating releases from petroleum underground storage tanks. You are encouraged to apply. To obtain an Application Package, contact the Fund at the following:

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 944212
Telephone: (916) 227-4366

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

Sincerely,

Juliet Shin, R.G.
Hazardous Materials Specialist

Cc: Jon Buck
Advanced Environmental Concepts, Inc.
4400 Ashe Road, #206
Bakersfield, CA 93313

Lou Vaught
50 California Street, Ste. 3240
San Francisco, CA 94111

Leroy Griffin
City of Oakland Fire Dept., OES
1605 Martin Luther King Jr. Way
Oakland, CA 94612-1393

TRANSMIT REPORT

1999.10-27 09:58
510 337 9335
ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
370	805 831 1771	10-27 09:57	01'14	03/03	OK		

7499402046

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 3

To Jon Buck	From Juliet Shin
Co. AEC	Co. Alameda Cty
Dept.	Phone # 510-567-6763
Fax # (661) 831-1771	Fax # 510-337-9335

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

October 27, 1999

Mr. Warren Dodson
Dodson Ltd.
1323 South Flower Street
Los Angeles, CA 90015

STID: 6059
Re: Investigations at 240 West MacArthur Blvd., Oakland, CA 94611

Dear Mr. Dodson,

I, Juliet Shin, have been designated as the new caseworker for the above site. Based on my review of the case files, it was determined that additional investigations will be required at the site.

In February 1991, a magnetometer survey, conducted by Mittelhauser Corporation, identified a large magnetic anomaly in the northwestern portion of the above site and a 350-gallon waste oil underground storage tank (UST) at the southern end of the site. The waste oil UST was subsequently removed from the site in October 1996. Two soil samples collected from the bottom of the tank pit at 7- and 8-feet below ground surface (bgs) were analyzed for Total Petroleum Hydrocarbons as diesel (TPHd), Total Oil & Grease (TOG), Methyl Tertiary Butyl Ether (MTBE), total lead, Semi-Volatile Organic Compounds (SVOCs), and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Analysis of these two samples identified up to 510 parts per million (ppm) TPHd and 7,000ppm TOG. Consequently, the tank pit was overexcavated down to 9-feet bgs, and five additional soil samples were collected from the excavation (SW1 through SW4 were collected from the four sidewalls of the excavation at 8.5-feet bgs; and one soil sample, EB, was collected from the bottom of the excavation at 9-feet bgs.) These soil samples were analyzed for the same constituents as above, with the addition of TPH as gasoline (TPHg). Analysis of these samples only identified low levels of TPHd and metals below threshold values.

CONTACT LOG (240 W. MacArthur Blvd.)

10/27/99 Lou Vaught, real estate agent for owner, 415-395-4467, called to request that he be copied on correspondences. His client, Mr. Dodson, is trying to sell property. Mr. Vaught's address is: 50 California Street, Ste. 3240
San Francisco, CA 94111

CONTACT LOG (240 W. MacArthur Blvd.)

09/23/99 Debbie Erwin, Advanced Environmental Concepts, (661) 831-1646 called to find out the status of the site.

09/23/99 Returned Ms. Erwin's call and told her that I would review the files & get back to her by next week.

09/24/99 Called & left message for Debbie Erwin requesting that she call me back so that we can discuss the site.

09/24/99 Debbie Erwin called back & left message.

09/24/99 I called Debbie Erwin, & she said that I should direct my questions to John Buck, Advanced Environmental Concepts. She will leave him a message to call me next week.

10/26/99 ~~Don~~ John Buck, AEC, (~~805~~ 661) 831-1646 called. Discussed my comments on site. The two primary concerns is the possible need to sample for PNAs and additional monitoring, and possible delineation, for MTBE. The BP contact is still Warren Dodson. I told him I would write letter and FAX to him @ (661) 831-1771. The site is currently used as a Auto Repair Shop. The downgradient property is leased by Kaiser Hospital.

10/26/99 Lou Vaught, represents owner, called & requested I return his call ⇒ 415-395-4467.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

November 27, 1998

Mr. Warren Dodson
Dodson. Ltd.
1323 South Flower Street
Los Angeles, California 90015

Ref: 240 West MacArthur Boulevard, Oakland, CA

Dear Mr. Dodson:

I am in receipt of the third quarterly groundwater sampling results, dated June 29, 1998 prepared by Advanced Environmental Concepts for the above referenced site. In response to a request for closure, this Department has reviewed all pertinent files. Based on the presence of benzene identified in significant concentrations in monitoring well, MW-2, this Department requires that an additional round of groundwater monitoring be conducted during the next two months (rainy season). This is required in order to complete the annual cycle (four quarters) which would take into account any seasonal fluctuations that may affect the concentration of petroleum hydrocarbons observed in the wells.

Subsequent to receiving the fourth quarter monitoring results, this Department would re-evaluate the site for closure. The site will be evaluated on pertinent factors, which may include the comparison of site concentrations to ASTM RBCA's (Risk Based Corrective Action Methodology) tier 1 levels. Based on the results of this evaluation, this Department may recommend that a site specific risk assessment be conducted for the referenced property. If you have any questions, you may reach me at (510) 567-6764

Sincerely,

Madhulla Logan
Hazardous Material Specialist

C: Debbie Irwin, AEC, 4400 Ashe Road #206, Bakersfield, CA 93313

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

March 12, 1997

Mr. Warren Dodson
Dodson, Limited
1323 South Flower Street
Los Angeles, CA 90015

Re: 240 West MacArthur Blvd, Oakland, CA

Dear Mr. Dodson:

I am in receipt of the Phase II subsurface investigation report, dated February 14, 1997 prepared by All Environmental, Inc., for the above referenced site.

One waste oil sump was removed from site in March 1991 and the soil samples collected subsequent to sump removal indicated up to 2600 ppm of oil and grease. Confirmation soil samples collected subsequent to excavation indicated the presence of residual amount of oil and grease up to 360 ppm.

In October 1996, a 350 gallon waste oil underground storage tank was removed and soil samples collected from the tank excavation indicated the presence of petroleum hydrocarbons. However, confirmation soil samples collected at 8.5 to 9 ft bgs subsequent to over excavation did not indicate the presence of any contaminants above the detection limit.

Due to a magnetometer anomaly identified in February 1991, additional investigation was conducted in January 1997 around this area and around the former waste oil tank. Six borings were drilled and both soil and groundwater samples were collected and analyzed for gasoline, diesel, MTBE, BTEX, PNAs and oil and grease. Based on the laboratory results of the soil and groundwater samples significant amounts of petroleum hydrocarbons have been identified. Hence the following additional work is required to complete site characterization:

- At least one soil boring should be drilled in the area around BH-4 and BH-6 to define the extent of contamination in the soil.

- At least three monitoring wells should be installed down gradient and cross gradient to suspected UST (magnetometer anomaly) and former waste oil areas.

Please submit a work plan to this Department to address the above listed requirements within 30 days from the date of this letter. If you have any questions you may reach me at (510) 567-6764.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 5, 1997

Mr. Warren Dodson
Dodson, Limited
1323 South Flower Street
Los Angeles, CA 90015

Re: 240 West MacArthur Blvd, Oakland, CA

Dear Mr. Dodson:

I am in receipt of the document "Soil and Groundwater Investigation Work plan", dated April 15, 1997, prepared by All Environmental, Inc. for the above referenced site.

This work plan has been reviewed by this Department and the proposed work is acceptable with the following modifications:

- Move the location of the proposed monitoring well in the northwest corner at least 10 feet to the right (towards east).
- At least two soil samples should be collected from each of the borings. Also, one of the soil samples should be collected just above the capillary zone.

Please submit a work plan to address the above listed requirements within 30 days from the date of this letter. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: **Jennifer Anderson, All Environmental, 3364 Mt. Diablo Blvd, Lafayetter, CA - 94549**

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name Dodson Ltd Today's Date 11/13/96

Site Address 240 W Mac Arthur Blvd

City Oak Zip 94611 Phone _____

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

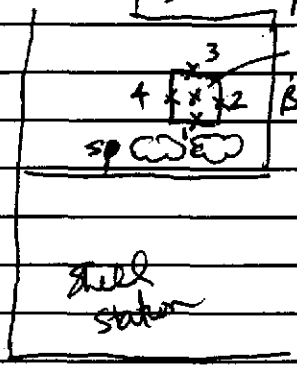
Inspection Categories:

____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
____ III. Underground Storage Tanks

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

Comments:

All Env - Durby Ray et al contractors
Waste oil tank pit has been overexc in 3 directions + vertically, approx 2' beyond original pit size. Confirmatory floor + sidewall samples taken



Pit approx 10X10X10
Approx 20 cy spoils generated
in addn to original spoils ~5 cy
no water in pit, Soils are moist gravelly silts

Soil Spls (1) from south wall ~8.5' bgs
Spl(2) from east wall ~ 8.5' bgs
Spl(3) from north " " "
Spl(4) from west " " "

Spls taken w/ an extended drive sampler except spl(5) floor bottom which was taken from backhoe bucket
Contact M. Logan to determine what chemical analyses to perform. 4 discrete samples taken from stockpile for characterization

Contact Jennifer Anderson
Title Project Manager
Signature _____

II, III

Inspector B. Chan
Signature BChan

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name _____ Today's Date___/___/___

Site Address _____

City _____ Zip 94___ Phone _____

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

Inspection Categories:

____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
____ III. Underground Storage Tanks

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

Comments:

II, III

Contact _____

Title _____ Inspector _____

Signature _____ Signature _____

RECORD CHANGE REQUEST FORM

Printed: 01/11/2000

Mark Out What Needs Changing and Hand to LOP Data Entry
(Name/Address changes go to Annual Programs Data Entry)

Temp: DH

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 12035
StID : 6059 LOC: -0-
SITE NAME: Dodson Ltd DATE REPORTED : 10/10/1996
ADDRESS : 240 W MacArthur Blvd DATE CONFIRMED: 10/10/1996
CITY/ZIP : Oakland 94611 MULTIPLE RPs : N

SITE STATUS

CASE TYPE: O CONTRACT STATUS: 8 PRIOR CODE:2A3 EMERGENCY RESP: -0-
RP SEARCH: S DATE COMPLETED: 01/08/1996
PRELIMINARY ASMNT: U DATE UNDERWAY: 01/10/1997 DATE COMPLETED: -0-
REM INVESTIGATION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
REMEDIAL ACTION: C DATE UNDERWAY: 11/19/1996 DATE COMPLETED: -0-
POST REMED ACT MON:U DATE UNDERWAY: 01/10/1997 DATE COMPLETED: -0-

ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 01/08/1996
LUFT FIELD MANUAL CONSID: 3WHG
CASE CLOSED: - DATE CASE CLOSED: -0-
DATE EXCAVATION STARTED : -0- REMEDIAL ACTIONS TAKEN: ED

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Warren Dodson
COMPANY NAME: 1323 South Flower Street
ADDRESS: Los Angeles, C A
CITY/STATE: 90015

INSPECTOR VERIFICATION:

--

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy.
Suite 250
Alameda, CA 94502-6577
(510) 567-6700

II,III

Site ID # ____ Site Name _____ Today's Date 10/3/96

Site Address 240 W MACARTHUR

City OAKLAND Zip 94611 Phone ____

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

Inspection Categories:

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

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

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)

II.B ACUTELY HAZ. MAT'LS

___	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 gndwater
One time soils
3) Daily Vadose
One time soils
Annual tank test
4) Monthly Gndwater
One time soils
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 tsting
8) Annual Tank Testing
Daily Inventory
9) Other _____

___	7. Precis Tank Test Date: _____	2643
___	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 Date: _____	2711
___	14. As Built Date: _____	2635

Rev 6/88

Comments:

One 300 gallon waste oil tank. Very corroded & pulled. One hole observed at the side of the tank. There was some odor and staining surrounding the tank. Herman Gothie from Oakl. Fire Dept was present. LEL 0% prior to tank removal. One sample was collected at 7½' — about 2 feet from bottom of the tank. The backhoe excavated soil and another soil sample was collected at 8'. The 2 sample are EB-7' & EB-8'. The excavated soil was separated into stockpiles — "clean" & "dirty" based on visual observation.

II, III

Contact: _____

Title: _____ Inspector: _____

Signature: _____ Signature: _____

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, California 94549
(510) 283-6000
(510) 283-6121 FAX

FAX TRANSMITTAL SHEET

TO: Mathulla Logan @ ACHCSA

FAX NUMBER: (510) 337-9335

FROM: Claudia Sparks, Project Manager

MESSAGE: To follow are analytical results for EPA Method 8270 and CAM 17 Metals as requested for the stockpiled soil at 240 West MacArthur Blvd, in Oakland. Please contact me to discuss after you have received the results.

Date: 10/18/96 **No. of Pages (Including Cover Page):** 4

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc. 3364 Mt. Diablo Blvd. Lafayette, CA 94549	Client Project ID: # 1451; Dodson	Date Sampled: 10/03/96
		Date Received: 10/04/96
	Client Contact: Claudia Sparks	Date Extracted: 10/09/96
	Client P.O:	Date Analyzed: 10/09/96

Volatile Organics By GC/MS

EPA method 624 or 8240

Lab ID	69788-91		
Client ID	STKP-3		
Matrix	S		
Compound	Concentration*	Compound	Concentration*
Acetone (b)	ND< 20	cis-1,3-Dichloropropene	ND
Benzene	ND	trans-1,3-Dichloropropene	ND
Bromodichloromethane	ND	Ethylbenzene	ND
Bromoform	ND	Methyl butyl ketone (d)	ND
Bromomethane	ND	Methylene Chloride(e)	ND< 15
Carbon Disulfide	ND	Methyl ethyl ketone (f)	ND
Carbon Tetrachloride	ND	Methyl isobutyl ketone (g)	ND
Chlorobenzene	ND	Styrene (k)	ND
Chloroethane	ND	1,1,2,2-Tetrachloroethane	ND
2-Chloroethyl Vinyl Ether(c)	ND	Tetrachloroethene	ND
Chloroform	ND	Toluene (l)	ND
Chloromethane	ND	1,1,1-Trichloroethane	ND
Dibromochloromethane	ND	1,1,2-Trichloroethane	ND
1,2-Dichlorobenzene	ND	Trichloroethene	ND
1,3-Dichlorobenzene	ND	Trichlorofluoromethane	ND
1,4-Dichlorobenzene	ND	Vinyl Acetate (m)	ND
1,1-Dichloroethane	ND	Vinyl Chloride (n)	ND
1,2-Dichloroethane	ND	Xylenes, total (o)	ND
1,1-Dichloroethene	ND	Surrogate Recoveries (%)	
cis-1,2-Dichloroethene	ND	Dibromofluoromethane	109
trans-1,2-Dichloroethene	ND	Toluene-d8	101
1,2-Dichloropropane	ND	4-Bromofluorobenzene	108

Comments:

Reporting limits unless otherwise stated: water samples 5 ug/L; vapor samples 0.5 ug/L; solid and sludge samples 5 ug/kg

* water and vapor samples are reported in ug/L, soil and sludge samples in ug/kg and all TCLP extracts in ug/L

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis

(b) 2-propanone or dimethyl ketone; (c) (2-chloroethoxy) ethene; (d) 2-hexanone; (e) dichloromethane; (f) 2-butanone; (g) 4-methyl-2-pentanone or isopropylacetone; (h) lighter than water immiscible sheen is present; (i) liquid sample that contains greater than ~ 5 vol. % sediment; (j) sample diluted due to high organic content; (k) ethenylbenzene; (l) methylbenzene; (m) acetic acid ethenyl ester; (n) chloroethene; (o) dimethylbenzenes.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc.	Client Project ID: # 1451; Dodson	Date Sampled: 10/03/96
3364 Mt. Diablo Blvd.		Date Received: 10/04/96
Lafayette, CA 94549	Client Contact: Claudia Sparks	Date Extracted: 10/10/96
	Client P.O:	Date Analyzed: 10/14/96

CAM / CCR 17 Metals*

EPA methods 6010/200.7; 7470/7471/245.1/245.5 (Hg); 7060/206.2 (As); 7740/270.2 (Se); 7841/279.2 (Tl); 239.2 (Pb, water matrix)

Lab ID	69788-91				Reporting Limit		
Client ID	STKP-3						
Matrix	S				S	W	STLC / TCLP
Extraction°	TTLC				TTLC	TTLC	
Compound	Concentration*				mg/kg	mg/L	mg/L
Antimony (Sb)	ND				2.5	0.05	0.05
Arsenic (As)	—				2.5	0.005	0.25
Barium (Ba)	78				1.0	0.05	0.05
Beryllium (Be)	ND				0.5	0.01	0.01
Cadmium (Cd)	ND				0.5	0.005	0.01
Chromium (Cr)	33				0.5	0.005	0.05
Cobalt (Co)	9.1				2.0	0.05	0.05
Copper (Cu)	14				2.0	0.05	0.05
Lead (Pb)	62				3.0	0.005	0.2
Mercury (Hg)	ND				0.06	0.0008	0.0008
Molybdenum (Mo)	ND				2.0	0.05	0.05
Nickel (Ni)	39				2.0	0.05	0.05
Selenium (Se)	—				2.5	0.005	0.25
Silver (Ag)	ND				1.0	0.01	0.05
Thallium (Tl)	—				0.5	0.001	0.05
Vanadium (V)	33				2.0	0.05	0.05
Zinc (Zn)	130				1.0	0.05	0.05
% Recovery Surrogate	97						
Comments							

* water samples are reported in mg/L, soil and sludge samples in mg/kg and all TCLP & STLC extracts in mg/L

ND means not detected above the reporting limit

° EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC from CA Title 22

surrogate diluted out of range; N/A means surrogate not applicable to this analysis

& reporting limit raised due matrix interference

i) liquid sample that contains greater than ~ 2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations.

DHS Certification No. 1644

Edward Hamilton, Lab Director

Chain of Custody

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, CA 94549
(510) 283-6000 FAX: (510) 283-6121

DATE: 10/3/96 PAGE: ____ OF: ____

7342 AALE87

AEI PROJECT MANAGER: Claudia Sparks
PROJECT NAME: Dodson
PROJECT NUMBER: 1451
SIGNATURE: CSparks
TOTAL # OF CONTAINERS: 10
REC'D. GOOD COND./COLD: ____

ANALYSIS REQUEST

SAMPLE I.D.	DATE	TIME	MATRIX	TPH-Gasoline (EPA 5030/8015)	TPH-Gasoline w/ BTEX and MTBE (EPA 5030/8015) (EPA 602/8020)	TPH-Diesel (EPA 3510/3550 8015)	PURGEABLE AROMATICS BTEX and MTBE (EPA 602/8020)	TOTAL OIL & GREASE (EPA 5520 E&F)	EPA 8270	VOLATILE ORGANIC COMPOUNDS (EPA 8240)	TTLC METALS	STLC CAM 17 (EPA 1311/6010)	RCI REACTIVITY CORROSIVITY IGNITABILITY (Title 22, CCR §66261.21-3)			NUMBER OF CONTAINERS
EB (7′)	10/3/96	12:55pm	SOIL			X	X	X					[redacted]			1
EB (8′)	↓	1:00pm	↓			X	X	X								1
STKP ①		1:05pm				X	X	X	X	X	X		[redacted]			1
STKP ②		1:10pm				X	X	X	X	X	X		[redacted]			1
STKP ③		1:12pm				X	X	X								1
STKP ④		1:15pm				X	X	X								1
STKP-2 ①		1:18pm				X	X	X	X	X	X		[redacted]			1
STKP-2 ②		1:20pm				X	X	X	X	X	X	Composite 4 to 1				1
STKP-2 ③		1:25pm				X	X	X				5day TAT				1
STKP-2 ④	↓	1:30pm	↓			X	X	X				I.D. AS STKP-3 10/11/96				1

ICE/t° ✓
GOOD CONDITION ✓ ✓
HEAD SPACE ABSENT ✓
PRESERVATIVE: VOAS | O&G | METALS | OTHER
APPROPRIATE CONTAINERS ✓

ANALYTICAL LAB: McCampbell Analytical
ADDRESS: 110 2nd Avenue South, #D7
Pacheco CA 94553
PHONE: 510 798-1620 FAX: 510 798-1622

INSTRUCTIONS/COMMENTS:
STKP ①-④ composite
STKP-2 ①-④ composite

RELINQUISHED BY: 1	RECEIVED BY: 1	RELINQUISHED BY: 2	RECEIVED BY: 2
CSparks (Signature)	Heidi Ricca (Signature)	Signature	Signature
CLAUDIA SPARKS (Printed Name)	HEIDI RICCA (Printed Name)	Printed Name	Printed Name
AEI (Company)	MAI (Company)	Company	Company
Time 11:10 pm Date 10/4/96	Time 11:10 am Date 10/4/96	Time ____ Date ____	Time ____ Date ____

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, California 94549
(510) 283-6000
(510) 283-6121 FAX

FAX TRANSMITTAL SHEET

TO: Mashulla Logan @ ACHCSA

FAX NUMBER: (510) 337-9335

FROM: Claudia Sparks, Project Manager

MESSAGE: To follow are EPA 8270 analytical results for soil sample EB-(8') at 240 West MacArthur Blvd. in Oakland.

Please call if you need any additional information.

Date: 10/25/96 **No. of Pages (Including Cover Page):** 3

CHROMALAB, INC.

Environmental Services (SDB)

October 25, 1996 *Submission #:* 9610271

MCCAMPBELL ANALYTICAL, INC.

Attn: Ed Hamilton

Project: A-1451 *Project#:* 7342
Received: October 18, 1996

re: One sample for Semivolatile Organic Compounds (B/NAs) analysis.
Method: EPA 8270A

Client Sample ID: KB (8')
Spl#: 104355 *Matrix:* SOIL *Extracted:* October 18, 1996
Sampled: October 3, 1996 *Run#:* 3767 *Analyzed:* October 24, 1996

ANALYTE	RESULT (mg/Kg)	REPORTING LIMIT (mg/Kg)	BLANK RESULT (mg/Kg)	BLANK SPIKE (%)	DILUTION FACTOR
PHENOL	N.D.	0.10	N.D.	84.6	1
BIS(2-CHLOROETHYL)ETHER	N.D.	0.10	N.D.	--	1
2-CHLOROPHENOL	N.D.	0.10	N.D.	73.3	1
1,3-DICHLOROBENZENE	N.D.	0.10	N.D.	--	1
1,4-DICHLOROBENZENE	N.D.	0.10	N.D.	75.0	1
BENZYL ALCOHOL	N.D.	0.20	N.D.	--	1
1,2-DICHLOROBENZENE	N.D.	0.10	N.D.	--	1
2-METHYLPHENOL	N.D.	0.10	N.D.	--	1
BIS(2-CHLOROISOPROPYL)ETHER	N.D.	0.10	N.D.	--	1
4-METHYLPHENOL	N.D.	0.20	N.D.	--	1
N-NITROSO-DI-N-PROPYLAMINE	N.D.	0.10	N.D.	74.5	1
HEXACHLOROETHANE	N.D.	0.10	N.D.	--	1
NITROBENZENE	N.D.	0.10	N.D.	--	1
ISOPHORONE	N.D.	0.10	N.D.	--	1
2-NITROPHENOL	N.D.	0.10	N.D.	--	1
2,4-DIMETHYLPHENOL	N.D.	0.10	N.D.	--	1
BIS(2-CHLOROETHOXY)METHANE	N.D.	0.10	N.D.	--	1
2,4-DICHLOROPHENOL	N.D.	0.10	N.D.	--	1
1,2,4-TRICHLOROBENZENE	N.D.	0.10	N.D.	75.0	1
NAPHTHALENE	N.D.	0.10	N.D.	--	1
4-CHLOROANILINE	N.D.	0.20	N.D.	--	1
HEXACHLOROBUTADIENE	N.D.	0.10	N.D.	--	1
4-CHLORO-3-METHYLPHENOL	N.D.	0.20	N.D.	83.6	1
2-METHYLNAPHTHALENE	N.D.	0.10	N.D.	--	1
HEXACHLOROCYCLOPENTADIENE	N.D.	0.10	N.D.	--	1
2,4,6-TRICHLOROPHENOL	N.D.	0.10	N.D.	--	1
2,4,5-TRICHLOROPHENOL	N.D.	0.10	N.D.	--	1
2-CHLORONAPHTHALENE	N.D.	0.10	N.D.	--	1
2-NITROANILINE	N.D.	0.50	N.D.	--	1
DIMETHYL PHTHALATE	N.D.	0.50	N.D.	--	1
ACENAPHTHYLENE	N.D.	0.10	N.D.	--	1
3-NITROANILINE	N.D.	0.10	N.D.	--	1
ACENAPHTHENE	N.D.	0.10	N.D.	82.0	1
2,4-DINITROPHENOL	N.D.	0.50	N.D.	--	1
4-NITROPHENOL	N.D.	0.50	N.D.	63.6	1
DIBENZOFURAN	N.D.	0.10	N.D.	--	1
2,4-DINITROTOLUENE	N.D.	0.10	N.D.	67.0	1
2,6-DINITROTOLUENE	N.D.	0.20	N.D.	--	1
DIETHYL PHTHALATE	N.D.	0.50	N.D.	--	1
4-CHLOROPHENYL PHENYL ETHER	N.D.	0.10	N.D.	--	1

CHROMALAB, INC.

Environmental Services (SDB)

October 25, 1996

Submission #: 9610271
page 2

MCCAMPBELL ANALYTICAL, INC.

Attn: Ed Hamilton

Project: A-1451 Project#: 7342
Received: October 18, 1996

re: One sample for Semivolatile Organic Compounds (B/NAs) analysis, continued.
Method: EPA 8270A

Client Sample ID: EB (8')
Spl#: 104355 Matrix: SOIL Extracted: October 18, 1996
Sampled: October 3, 1996 Run#: 3767 Analyzed: October 24, 1996

ANALYTE	RESULT (mg/Kg)	REPORTING LIMIT (mg/Kg)	BLANK RESULT (mg/Kg)	BLANK SPIKE (%)	DILUTION FACTOR
FLUORENE	N.D.	0.10	N.D.	--	1
4-NITROANILINE	N.D.	0.50	N.D.	--	1
2-METHYL-4,6-DINITROPHENOL	N.D.	0.50	N.D.	--	1
N-NITROSO-DI-N-PHENYLAMINE	N.D.	0.10	N.D.	--	1
4-BROMOPHENYL PHENYL ETHER	N.D.	0.10	N.D.	--	1
HEXACHLOROBENZENE	N.D.	0.10	N.D.	--	1
PENTACHLOROPHENOL	N.D.	0.50	N.D.	45.3	1
PHENANTHRENE	N.D.	0.10	N.D.	--	1
ANTHRACENE	N.D.	0.10	N.D.	--	1
DI-N-BUTYL PHTHALATE	N.D.	0.50	N.D.	--	1
FLUORANTHENE	N.D.	0.10	N.D.	--	1
PYRENE	N.D.	0.10	N.D.	75.2	1
BUTYL BENZYL PHTHALATE	N.D.	0.50	N.D.	--	1
3,3'-DICHLOROBENZIDINE	N.D.	0.20	N.D.	--	1
BENZO(A)ANTHRACENE	N.D.	0.10	N.D.	--	1
BIS(2-ETHYLHEXYL) PHTHALATE	N.D.	0.50	N.D.	--	1
CHRYSENE	N.D.	0.10	N.D.	--	1
DI-N-OCTYL PHTHALATE	N.D.	0.50	N.D.	--	1
BENZO(B)FLUORANTHENE	N.D.	0.10	N.D.	--	1
BENZO(K)FLUORANTHENE	N.D.	0.20	N.D.	--	1
BENZO(A)PYRENE	N.D.	0.050	N.D.	--	1
INDENO(1,2,3 C,D)PYRENE	N.D.	0.20	N.D.	--	1
DIBENZO(A,H)ANTHRACENE	N.D.	0.20	N.D.	--	1
BENZO(G,H,I)PERYLENE	N.D.	0.20	N.D.	--	1
BENZOIC ACID	N.D.	0.50	N.D.	--	1

Michael Lee
Chemist

Chip Poalinelli
Operations Manager

510-798-1622 [illegible]

1220 Quarry Lane • Pleasanton, California 94566-4756
(510) 484-1919 • Facsimile (510) 484-1096
Federal ID #68-0140157

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, California 94549
(510) 283-6000
(510) 283-6121 FAX

FAX TRANSMITTAL SHEET

TO: Madhulla Logan @ ACHCSA

FAX NUMBER: (510) 337-9335

FROM: Claudia Sparks, Project Manager

MESSAGE: To follow are analytical results for soil samples collected from the tank removal project at 240 West MacArthur Blvd, Oakland.

Please review and contact me if you have any questions or concerns. Thank you.

Date: 10/10/96 **No. of Pages (Including Cover Page):** 5

Data Reported

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax 510-798-1622

All Environmental, Inc.	Client Project ID: # 1451; Dodson	Date Sampled: 10/03/96
3364 Mt. Diablo Blvd.		Date Received: 10/04/96
Lafayette, CA 94549	Client Contact: Claudia Sparks	Date Extracted: 10/10/96
	Client P.O:	Date Analyzed: 10/10/96

Petroleum Oil & Grease (with Silica Gel Clean-up) *

EPA methods 413.1, 9070 or 9071; Standard Methods 5520 D/E&F or 503 D&E for solids and 5520 B&F or 503 A&E for liquids

Lab ID	Client ID	Matrix	Oil & Grease*
69788	EB (7')	S	7000 ✓
69789	EB (8')	S	ND
69790	STKP (1-4)	S	580
69791	STKP-2 (1-4)	S	1300 ✓
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	5 mg/L
		S	50 mg/kg

* water samples are reported in mg/L and soil and sludge samples in mg/kg

h) lighter than water immiscible sheen is present; i) liquid sample that contains greater than ~ 5vol. % sediment.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc.	Client Project ID: # 1451; Dodson	Date Sampled: 10/03/96
3364 Mt. Diablo Blvd.		Date Received: 10/04/96
Lafayette, CA 94549	Client Contact: Claudia Sparks	Date Extracted: 10/04/96
	Client P.O:	Date Analyzed: 10/04/96

Diesel Range (C10-C23) Extractable Hydrocarbons as Diesel *

EPA methods modified 8015, and 3550 or 3510; California RWQCB (SF Bay Region) method GCFID(3550) or GCFID(3510)

Lab ID	Client ID	Matrix	TPH(d)^	% Recovery Surrogate
69788	EB (7')	S	510,g	106
69789	EB (8')	S	ND	103
69790	STKP (1-4)	S	31,g	98
69791	STKP-2 (1-4)	S	100,g	100
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	50 ug/L	
		S	1.0 mg/kg	

* water samples are reported in ug/L, soil and sludge samples in mg/kg, and all TCLP and STLC extracts in mg/L

cluttered chromatogram resulting in coeluted surrogate and sample peaks, or; surrogate peak is on elevated baseline, or; surrogate has been diminished by dilution of original extract.

^ The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified diesel is significant; b) diesel range compounds are significant; no recognizable pattern; c) aged diesel? is significant); d) gasoline range compounds are significant; e) medium boiling point pattern that does not match diesel (7); f) one to a few isolated peaks present; g) oil range compounds are significant; h) lighter than water immiscible sheen is present; i) liquid sample that contains greater than ~ 5 vol. % sediment.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553 Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc.	Client Project ID: # 1451; Dodson	Date Sampled: 10/03/96
3364 Mt. Diablo Blvd.		Date Received: 10/04/96
Lafayette, CA 94549	Client Contact: Claudia Sparks	Date Extracted: 10/04/96
	Client P.O:	Date Analyzed: 10/04-10/07/96

Gasoline Range (C6-C12) Volatile Hydrocarbons as Gasoline*, with Methyl tert-Butyl Ether* & BTEX*

EPA methods 5030, modified 8015, and 8020 or 602; California RWQCB (SF Bay Region) method GCFID(5030)

Lab ID	Client ID	Matrix	TPH(g)+	MTBE	Benzene	Toluene	Ethylben-zene	Xylenes	% Rec. Surrogate
69788	EB (7')	S	---	ND	ND	0.006	0.009	0.033	93
69789	EB (8')	S	---	ND	ND	ND	ND	ND	106
69790	STKP (1-4)	S	---	ND	ND	ND	ND	ND	101
69791	STKP-2 (1-4)	S	---	ND	ND	ND	ND	0.012	102
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	50 ug/L	5.0	0.5	0.5	0.5	0.5	
		S	1.0 mg/kg	0.05	0.005	0.005	0.005	0.005	

* water and vapor samples are reported in ug/L, soil and sludge samples in mg/kg, and all TCLP extracts in mg/L

cluttered chromatogram; sample peak coelutes with surrogate peak

+ The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified gasoline is significant; b) heavier gasoline range compounds are significant(aged gasoline?); c) lighter gasoline range compounds (the most mobile fraction) are significant; d) gasoline range compounds having broad chromatographic peaks are significant; biologically altered gasoline?; e) TPH pattern that does not appear to be derived from gasoline (?); f) one to a few isolated peaks present; g) strongly aged gasoline or diesel range compounds are significant; h) lighter than water immiscible sheen is present; i) liquid sample that contains greater than ~ 5 vol. % sediment; j) no recognizable pattern.

DHS Certification No. 1644

Edward Hamilton, Lab Director

Chain of Custody

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, CA 94549
(510) 283-6000 FAX: (510) 283-6121

DATE: 10/3/96 PAGE: ____ OF: ____

7342 AALE87

AEI PROJECT MANAGER: Claudia Sparks
PROJECT NAME: Dolan
PROJECT NUMBER: 1451
SIGNATURE: Csparks
TOTAL # OF CONTAINERS: 10
RECD. GOOD COND./COLD: ____

ANALYSIS REQUEST

SAMPLE I.D.	DATE	TIME	MATRIX	TPH-Gasoline (EPA 5030/8015)	TPH-Gasoline (EPA 5030/8015) w/ BTEX and MTBE (EPA 602/8020)	TPH-Diesel (EPA 3510/3550/8015)	PURGEABLE AROMATICS BTEX and MTBE (EPA 602/8020)	TOTAL OIL & GREASE (EPA 5520 E&F)	TOTAL LEAD (AA) (EPA 7420)	VOLATILE ORGANIC COMPOUNDS (EPA 624/8240)	LUFT Metals (EPA 7190, 7420, 7520, 7610)	STLC CAM 17 (EPA 1310/6010)	[illegible] REACTIVITY, CORROSIVITY, IGNITABILITY (Title 22, CFR 66261.21-23)				NUMBER OF CONTAINERS
EB (7')	10/3/96	12:55pm	Soil			X	X	X									1
EB (8')		1:00pm				X	X	X									1
STKP ①		1:05pm				X	X	X									1
STKP ②		1:10pm				X	X	X									1
STKP ③		1:12pm				X	X	X									1
STKP ④		1:15pm				X	X	X									1
STKP-2 ①		1:18pm				X	X	X									1
STKP-2 ②		1:20pm				X	X	X									1
STKP-2 ③		1:25pm				X	X	X									1
STKP-2 ④		1:30pm				X	X	X									1

	VOAs	O&G	METALS	OTHER
PRESERVATIVE				

ICE/T° ✓
GOOD CONDITION ✓
HEAD SPACE ABSENT ✓
PRESERVATIVE APPROPRIATE ✓
CONTAINERS

ANALYTICAL LAB: McCampbell Analytical
ADDRESS: 110 2nd Ave South, D7
Pacheco CA 94553
PHONE: 510 798-1620 FAX: 510 798-1622

INSTRUCTIONS/COMMENTS:
STKP ① - ④ composite
STKP-2 ① - ④ composite

RELINQUISHED BY: 1	RECEIVED BY: 1	RELINQUISHED BY: 2	RECEIVED BY: 2
Signature: Csparks	Signature: Heidi Rivera	Signature:	Signature:
Printed Name: CLAUDIA SPARKS	Printed Name: Heidi Rivera	Printed Name:	Printed Name:
Company: AEI	Company: MAI	Company:	Company:
Time: 11:10 pm Date: 10/4/96	Time: 11:10 AM Date: 10/4/96	Time: Date:	Time: Date:

ALAMEDA COUNTY -ENVIRONMENTAL HEALTH

Transfer of Eligible Local Oversight Case

STID 6059 Date of input/By: JAN 90 NAV

Date: 1/6/96 From: Madhulla Logan

Site Name: Dodson Ltd; Vogue Tires.

Address: 240 W MACARTHUR City: OAKLAN Zip: 94611

To be eligible for LOP, case must meet 3 qualifications:

1. (Y) N Tanks Removed? # of removed? 1 Date removed: 10/3/96

2. Y N Samples received? Contamination level: 7000 ppm
   Type of test oil + Grease
   Contamination should be over 100 ppm TPH to qualify for LOP

3. Y N Petroleum? Circle Type(s): • Avgas •leaded •unleaded •fuel oil •jet • diesel •waste oil •kerosene •solvents

Procedure to follow should your site meet all the above qualifications:

1. a. ___ Close the deposit refund case.
   b. ___ Account for **ALL** time you have spent on the case.
   c. ___ Turn in account sheet to Leslie.
   If there are funds still remaining it is still better to transfer the case to LOP as the rate for LOP allows more overhead. **DO NOT** attempt to continue to oversee the site simply because there are funds remaining!

   Remaining DepRef $'s: _____
   DepRef Case Closed with Candyce/Leslie? **Y N** (If no, explain why below.)

2. Submit the completed **A** and **B** permit application forms to **NORMA**.

3. Give the entire case to the proper LOP staff.

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, California 94549
(510) 283-6000
(510) 283-6121 FAX

FAX TRANSMITTAL SHEET

TO: Madhulla Logan

FAX NUMBER: 337 9335

FROM: Jennifer Anderson

MESSAGE:

Date: 1/15/97 No. of Pages (Including Cover Page): 8

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc. 3364 Mt. Diablo Blvd. Lafayette, CA 94549	Client Project ID: # 1493; Dodson	Date Sampled: 01/08/97
		Date Received: 01/10/97
	Client Contact: Jennifer Anderson	Date Extracted: 01/10-01/13/97
	Client P.O:	Date Analyzed: 01/10-01/13/97

Gasoline Range (C6-C12) Volatile Hydrocarbons as Gasoline*, with Methyl tert-Butyl Ether* & BTEX*
EPA methods 5030, modified 8015, and 8020 or 602; California RWQCB (SF Bay Region) method GCFID(5030)

Lab ID	Client ID	Matrix	TPH(g)+	MTBE	Benzene	Toluene	Ethylbenzene	Xylenes	% Rec. Surrogate
72755	BH4,L3-15'	S	1100,j	ND< 3	ND< 0.02	ND< 0.02	4.4	14	—#
72758	BH5,L3-15'	S	2.1,j	ND	0.009	0.006	ND	0.016	104
72762	BH6,L3-15'	S	190,j	ND< 0.6	0.25	0.50	0.84	3.6	118#
72765	BH2,L3-15'	S	ND	ND	ND	ND	ND	ND	97
72768	BH3,L3-15'	S	ND	ND	ND	ND	ND	ND	98
72771	BH1,L3-15'	S	ND	ND	ND	ND	ND	ND	97
72772	BH4W	W	6600,b,d	170	58	13	110	270	97
72773	BH6W	W	13,000,a,h	320	870	65	130	570	102
72774	BH2W	W	ND,i	ND	ND	ND	ND	ND	105
72775	BH1W	W	330,c,j,i	220	2.0	0.72	ND	1.3	105
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	50 ug/L	5.0	0.5	0.5	0.5	0.5	
		S	1.0 mg/kg	0.05	0.005	0.005	0.005	0.005	

* water and vapor samples are reported in ug/L, soil and sludge samples in mg/kg, and all TCLP extracts in mg/L

cluttered chromatogram; sample peak coelutes with surrogate peak

+ The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified gasoline is significant; b) heavier gasoline range compounds are significant(aged gasoline?); c) lighter gasoline range compounds (the most mobile fraction) are significant; d) gasoline range compounds having broad chromatographic peaks are significant; biologically altered gasoline?; e) TPH pattern that does not appear to be derived from gasoline (?); f) one to a few isolated peaks present; g) strongly aged gasoline or diesel range compounds are significant; h) lighter than water immiscible sheen is present; i) liquid sample that contains greater than ~ 5 vol. % sediment; j) no recognizable pattern.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc. 3364 Mt. Diablo Blvd. Lafayette, CA 94549	Client Project ID: # 1493; Dodson	Date Sampled: 01/08/97
		Date Received: 01/10/97
	Client Contact: Jennifer Anderson	Date Extracted: 01/10/97
	Client P.O:	Date Analyzed: 01/10/97

Diesel Range (C10-C23) Extractable Hydrocarbons as Diesel *

EPA methods modified 8015, and 3550 or 3510; California RWQCB (SF Bay Region) method GCFID(3550) or GCFID(3510)

Lab ID	Client ID	Matrix	TPH(d)^	% Recovery Surrogate
72755	BH4,L3-15'	S	370,d	102
72758	BH5,L3-15'	S	1.9,d	102
72762	BH6,L3-15'	S	140,d	102
72765	BH2,L3-15'	S	ND	107
72768	BH3,L3-15'	S	ND	107
72771	BH1,L3-15'	S	ND	108
72773	BH6W	W	450,000,d,h	108
72774	BH2W	W	320,g,b,i	105
72775	BH1W	W	490,g,d,i	108
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	50 ug/L	
		S	1.0 mg/kg	

* water samples are reported in ug/L, soil and sludge samples in mg/kg, and all TCLP and STLC extracts in mg/L

cluttered chromatogram resulting in coeluted surrogate and sample peaks, or; surrogate peak is on elevated baseline, or; surrogate has been diminished by dilution of original extract.

^ The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified diesel is significant; b) diesel range compounds are significant; no recognizable pattern; c) aged diesel? is significant); d) gasoline range compounds are significant; e) medium boiling point pattern that does not match diesel (?); f) one to a few isolated peaks present; g) oil range compounds are significant; h) lighter than water immiscible sheen is present; i) liquid sample that contains greater than ~ 5 vol. % sediment.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc. 3364 Mt. Diablo Blvd. Lafayette, CA 94549	Client Project ID: # 1493; Dodson	Date Sampled: 01/08/97
		Date Received: 01/10/97
	Client Contact: Jennifer Anderson	Date Extracted: 01/10/97
	Client P.O:	Date Analyzed: 01/10/97

Petroleum Oil & Grease (with Silica Gel Clean-up) *

EPA methods 413.1, 9070 or 9071; Standard Methods 5520 D/F&F or 503 D&E for solids and 5520 B&F or 503 A&E for liquids

Lab ID	Client ID	Matrix	Oil & Grease*
72765	BH2,L3-15'	S	ND
72768	BH3,L3-15'	S	ND
72774	BH2W	W	ND,i
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	5 mg/L
		S	50 mg/kg

* water samples are reported in mg/L and soil and sludge samples in mg/kg

h) lighter than water immiscible sheen is present; i) liquid sample that contains greater than ~ 5vol. % sediment.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc. 3364 Mt. Diablo Blvd. Lafayette, CA 94549	Client Project ID: # 1493; Dodson	Date Sampled: 01/08/97
		Date Received: 01/10/97
	Client Contact: Jennifer Anderson	Date Extracted: 01/13/97
	Client P.O:	Date Analyzed: 01/13/97

Dissolved Lead*

EPA analytical methods 6010/200.7, 239.2*

Lab ID	Client ID	Matrix	Extraction°	Lead*	% Recovery Surrogate
72773	BH6W	W	TTLC	ND	NA
72774	BH2W	W	TTLC	ND,i	NA
72775	BH1W	W	TTLC	ND,i	NA
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		S	TTLC	3.0 mg/kg	
		W	TTLC	0.005 mg/L	
		---	STLC,TCLP	0.2 mg/L	

* soil and sludge samples are reported in mg/kg, and water samples and all STLC & TCLP extracts in mg/L

* Lead is analyzed using EPA method 6010 (ICP)for soils, sludges, STLC & TCLP extracts and method 239.2 (AA Furnace) for water samples

° EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC from CA Title 22

surrogate diluted out of range; N/A means surrogate not applicable to this analysis

@ reporting limit raised due matrix interference

i) liquid sample that contains greater than ~ 2 vol. % sediment, this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC. | 110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

All Environmental, Inc. 3364 Mt. Diablo Blvd. Lafayette, CA 94549	Client Project ID: # 1493; Dodson	Date Sampled: 01/08/97
		Date Received: 01/10/97
	Client Contact: Jennifer Anderson	Date Extracted: 01/10/97
	Client P.O:	Date Analyzed: 01/13/97

Lead[a]

EPA analytical methods 6010/200.7, 239.2[a]

Lab ID	Client ID	Matrix	Extraction[c]	Lead[a]	% Recovery Surrogate
72755	BH4,L3-15'	S	TTLC	6.2	102
72758	BH5,L3-15'	S	TTLC	4.6	102
72762	BH6,L3-15'	S	TTLC	23	102
72765	BH2,L3-15'	S	TTLC	8.4	103
72768	BH3,L3-15'	S	TTLC	7.6	103
72771	BH1,L3-15'	S	TTLC	15	101
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		S	TTLC	3.0 mg/kg	
		W	TTLC	0.005 mg/L	
		—	STLC,TCLP	0.2 mg/L	

[a] soil and sludge samples are reported in mg/kg, and water samples and all STLC & TCLP extracts in mg/L

[a] Lead is analyzed using EPA method 6010 (ICP)for soils, sludges, STLC & TCLP extracts and method 239.2 (AA Furnace) for water samples

[c] EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC from CA Title 22

[d] surrogate diluted out of range; N/A means surrogate not applicable to this analysis

[e] reporting limit raised due matrix interference

[i] liquid sample that contains greater than ~ 2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly affect reported metal concentrations.

DHS Certification No. 1644

Edward Hamilton, Lab Director

Chain of Custody

ALL ENVIRONMENTAL, INC. 7933
3364 Mt. Diablo Boulevard
Lafayette, CA 94549
(510) 283-6000 FAX: (510) 283-6121

DATE 1/8/97 PAGE: 2 OF 2

AALE 116

AEI PROJECT MANAGER: Jennifer Anderson
PROJECT NAME: Dodson
PROJECT NUMBER: 143
SIGNATURE: [signature]
TOTAL # OF CONTAINERS: 38
RECD. GOOD COND./COLD: YES

ANALYSIS REQUEST

SAMPLE I.D.	DATE	TIME	MATRIX	TPH Gasoline (EPA 5030/8015)	TPH Gasoline (EPA 5030/8015) w/ BTEX and MTBE (EPA 602/8020)	TPH Diesel (EPA 3510/3550/8015)	PURGEABLE AROMATICS BTEX and MTBE (EPA 602/8020)	TOTAL OIL & GREASE (EPA 5520 E&F)	TOTAL LEAD (AA) (EPA 7420)	VOLATILE ORGANIC COMPOUNDS (EPA 8240)	LUFT Metals (EPA 7130, 7190, 7420, 7460, 7840)	STLC CAM 17 (EPA 1310/6010)	RCI REACTIVITY (CORROSIVITY, IGNITABILITY (Title 22 CCR 66261.21))	PNAs	
BH3, L3-15'	1/8/97	1300	SOIL		X	X		X	X					X	
BH1, L1-5'		1320													
BH1, L2-11'		1330													
BH1, L3-16'		1345			X	X			X						
BH4W	1/8/97	—	WATER		X										
BH6W		—			X	X			Diesel X						
BH2W		—			X	X		X	diesel/gas X					X	
BH1W		—			X	X			Diesel X						

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ANALYTICAL LAB: McCampbell
ADDRESS:
PHONE: ( ) FAX: ( )
INSTRUCTIONS/COMMENTS:

RELINQUISHED BY: 1	RECEIVED BY: 1	RELINQUISHED BY: 2	RECEIVED BY: 2
Signature: [signature]	Signature: [signature]	Signature: [signature]	Signature: [signature]
Printed Name: Jennifer Anderson	Printed Name: Ron Hansteen	Printed Name: Ron Hansteen	Printed Name: H. Ricca
Company: AEI	Company: AEI	Company: AEI	Company: MAI
Time: 1125 Date: 1/10/97	Time: 11:25 Date: 1/10/97	Time: 3:00 Date: 1/10/97	Time: 1500 Date: 1/10/97

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JAN-15-1997 16:55 2 P.07

ALL ENVIRONMENTAL, INC.
3364 Mt. Diablo Boulevard
Lafayette, CA 94549
(510) 283-6000 FAX: (510) 283-6121

7933

Chain of Custody

DATE: 1/8/97 PAGE: 1 OF 2

AALE/16

AEI PROJECT MANAGER: Jennifer Anderson
PROJECT NAME: Dodson
PROJECT NUMBER: 1493
SIGNATURE: [signature]
TOTAL # OF CONTAINERS: 38
RECD. GOOD COND./COLD: Yes

ANALYSIS REQUEST

SAMPLE I.D.	DATE	TIME	MATRIX	TPH-Gasoline (EPA 5030, 8015)	TPH-Gasoline (EPA 5030, 8015) w/ BTEX and MTBE (EPA 602, 8020)	TPH-Diesel (EPA 3510/3550, 8015)	PURGEABLE AROMATICS BTEX and MTBE (EPA 602, 8020)	TOTAL OIL & GREASE (EPA 5520 E&F)	TOTAL LEAD (AA) (EPA 7420)	VOLATILE ORGANIC COMPOUNDS (EPA 8240)	LUFT Metals (EPA 7130, 7190, 7420, 7520, 7950)	STLC CAM 17 (EPA 1310/6010)	RCI REACTIVITY, CORROSIVITY, IGNITABILITY (Title 22, CCR 66261, 21-24)	PNA's	
BH4, L1-5'	1/8/97	915	SOIL												
BH4, L2-10'	↓	930	↓												
BH4, L3-15'		945			X	X			X						
BH5, L1-5'		1015													
BH5, L2-10'		1025													
BH5, L3-15'		1035			X	X			X						
BH6, L1-5'		1045													
BH6, L2-10'		1055													
BH6, L3a-14'		1100													
BH6, L3-15'		1102			X	X			X						
BH2, L1-5'		1135													
BH2, L2-10'		1145													
BH2, L3-15'		1155			X	X		X	X					X	
BH3, L1-5'		1235													
BH3, L2-10'	↓	1250	↓												

ANALYTICAL LAB: McCampbell
ADDRESS:
PHONE: ( ) - FAX: ( )
INSTRUCTIONS/COMMENTS:

RELINQUISHED BY: 1	RECEIVED BY: 1	RELINQUISHED BY: 2	RECEIVED BY: 2
Signature: [signature]	Signature: [signature]	Signature: [signature]	Signature: [signature]
Printed Name: Jennifer Anderson	Printed Name: Ron Hamilton	Printed Name: Ron Hamilton	Printed Name: A. Ricca
Company: AEI	Company: Onsite/JRH	Company: Mar/JRH	Company: MAI
Time 11:25 Date 1/10/97	Time 11:25 Date 1/10/97	Time 5:00 Date 1/10/97	Time 1500 Date 1/10/97

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Project Specialist

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PARKWAY, RM 250
ALAMEDA, CA 94502-6577
PHONE # 510/567-6700
FAX # 510/337-9335

ACCEPTED

Underground Storage Tank Closure Permit Application
Alameda County Division of Hazardous Materials
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

These underground plans have been received and found to be acceptable and essentially meet the requirements of State and Local Health Laws. Changes to your closure plans indicated by this Department are to assure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction/destruction.

One copy of the accepted plans must be on the job and available to all contractors and craftsmen involved with the removal.

Any changes or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspection Department to determine if such changes meet the requirements of State and local laws.

Notify this Department at least 72 hours prior to the following required inspections:

___ Removal of Tank(s) and Piping
___ Sampling
___ Final Inspection

Issuance of a) permit to operate, b) permanent site closure, is dependent on compliance with accepted plans and all applicable laws and regulations.

THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.

Contact Specialist [signature]

9/25/96

UNDERGROUND TANK CLOSURE PLAN

* * * Complete according to attached instructions * * *

1. Name of Business Dodson, Ltd. / Vogue Tires

   Business Owner or Contact Person (PRINT) Mr. Warren Dodson

2. Site Address 240 West MacArthur Boulevard

   City Oakland Zip 94611 Phone (510) 653-5818

3. Mailing Address 240 West Macarthur Boulevard

   City Oakland Zip 94611 Phone (510) 653-5818

4. Property Owner Dodson, Ltd.

   Business Name (if applicable) ______

   Address 1323 South Flower Street

   City, State Los Angeles, CA Zip 90015

5. Generator name under which tank will be manifested

   Dodson, Ltd.

EPA ID# under which tank will be manifested CAC001236200

(213) 463-9735 663-4177 (310) 201-6510

rev 4/6/95

6. Contractor All Environmental, Inc.

Address 3364 Mt. Diablo Blvd.

City Lafayette Phone (510) 283-6000

License Type* A/Haz ID# 654919

***Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board.**

7. Consultant (if applicable) All Environmental, Inc.

Address 3364 Mt. Diablo Blvd.

City, State Lafayette, CA Phone (510) 283-6000

8. Main Contact Person for Investigation (if applicable)

Name Jennifer Anderson Title Project Manager

Company All Environmental, Inc.

Phone (510) 283-6000

9. Number of underground tanks being closed with this plan (1) one

Length of piping being removed under this plan 10 ft

Total number of underground tanks at this facility (**confirmed with owner or operator) (1) one

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

**** Underground storage tanks must be handled as hazardous waste ****

a) Product/Residual Sludge/Rinsate Transporter

Name American Valley Envtl Services EPA I.D. No. CAL000121154

Hauler License No. 2953 License Exp. Date 6/30/97

Address 2930 Geer Road, Suite 156

City Turlock State CA Zip 95382

b) Product/Residual Sludge/Rinsate Disposal Site

Name Petroleum Recycling Corporation EPA ID# CAD083166728

Address P.O. Box 1167

City Patterson State CA Zip 95363

c) Tank and Piping Transporter

Name Dexanna EPA I.D. No. CAD982438566

Hauler License No. 2883 License Exp. Date 8/97

Address 3104 Athene Court

City Concord State CA Zip 94519

d) Tank and Piping Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD009466392

Address 255 Parr Blvd.

City Richmond State CA Zip 94801

11. Sample Collector

Name Jennifer Anderson

Company All Environmental, Inc.

Address 3364 Mt. Diablo Blvd.

City Lafayette State CA Zip 94549 Phone (510) 283-6000

12. Laboratory

Name McCampbell Analytical

Address 110 2nd Avenue South D#7

City Pacheco State CA Zip 94553

State Certification No. DOHS 1644

13. Have tanks or pipes leaked in the past? Yes[ ] No[ ] Unknown[X]

If yes, describe.

14. Describe methods to be used for rendering tank(s) inert:

Dry ice at a rate of at least 1.5 lbs. per 100 gallons tank volume.

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be permanently plugged.

The Bay Area Air Quality Management District, 415/771-6000, along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of a combustible gas indicator to verify tank inertness. **It is the contractor's responsibility to bring a working combustible gas indicator on-site to verify that the tank is inert.**

15. Tank History and Sampling Information *** (see instructions) ***

Tank		Material to be sampled (tank contents, soil, groundwater)	Location and Depth of Samples
Capacity	Use History include date last used (estimated)		
500	unk	Soil	(1) one soil sample from 2 ft beneath center of tank exc.

One soil sample must be collected for every 20 linear feet of piping that is removed. A ground water sample must be collected if any ground water is present in the excavation.

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (estimated)	**Sampling Plan**
5 cu yd	(4) four discrete soil samples combined into one composite soil sample by laboratory

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

Will the excavated soil be returned to the excavation immediately after tank removal? [ ] yes [ ] no [X] unknown

If yes, explain reasoning If contamination, soil will not be returned.

If unknown at this point in time, please be aware that excavated soil may not be returned to the excavation without prior approval from Alameda County. This means that the contractor, consultant, or responsible party must communicate with the Specialist IN ADVANCE of backfilling operations.

16. **Chemical methods and associated detection limits to be used for analyzing samples:**
The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed.
See attached Table 2.

17. **Submit Site Health and Safety Plan (See Instructions)**

Contaminant Sought	EPA or Other Sample Preparation Method Number	EPA or Other Analysis Method Number	Method Detection Limit
TPH-gas	EPA 5030/8015		1 ppm
TPH-diesel	EPA 3510/8015		1 ppm
BTEX/MTBE	EPA 5030/8020		.005 ppm
TOG	EPA 5520		50 ppm
Chlorinated Hyd	EPA 8240		.005 ppm
LUFT Metals	EPA 6010 & 7000 series		0.5 ppm
Recommended – If you detect MTBE in the 8015 test then run separate for MTBE by using EPA method – 8260.			
PNA	8270?		1ppm-soil 1ppb-h2O.

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Fund

19. Submit Plot Plan ***(See Instructions)***

20. Enclose Deposit (See Instructions)

21. **Report any leaks or contamination to this office within 5 days of discovery.**
The written report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report (ULR) form.

22. **Submit a closure report to this office within 60 days of the tank removal. The report must contain all information listed in item 22 of the instructions.**

23. Submit State (Underground Storage Tank Permit Application) Forms A and B (one B form for each UST to be removed) (mark box 8 for "tank removed" in the upper right hand corner)

I declare that to the best of my knowledge and belief that the statements and information provided above are correct and true.

I understand that information, in addition to that provided above, may be needed in order to obtain approval from the Environmental Protection Division and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

CONTRACTOR INFORMATION

Name of Business All Environmental, Inc.

Name of Individual Jennifer Anderson

Signature [signature] Date 9/5/96

PROPERTY OWNER OR MOST RECENT TANK OPERATOR (Circle one)

Name of Business Dodson, Ltd.

Name of Individual Warren Dodson

Signature [signature] FOR WARREN DODSON Date 9/5/96

General Instructions

* Three (3) copies of this plan plus attachments and a deposit must be submitted to this Department.

* Any cutting into tanks requires local fire department approval.

* One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.

* State of California Permit Application Forms A and B are to be submitted to this office. One Form A per site, one Form B for each removed tank.

Line Item Specific Instructions

2. SITE ADDRESS
Address at which closure is taking place.

5. EPA I.D. NO. under which the tanks will be manifested
EPA I.D. numbers may be obtained from the State Department of Toxic Substances Control, 916/324-1781.

6. CONTRACTOR
Prime contractor for the project.

10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES

a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.

c) Tanks must be hauled as hazardous waste.

d) This is the place where tanks will be taken for cleaning.

15. TANK HISTORY AND SAMPLING INFORMATION
Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, **and the date when the tank was last used.**

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS
See attached Table 2.

17. SITE HEALTH AND SAFETY PLAN
A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

a) The name and responsibilities of the site health and safety officer;

b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;

c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;

d) For each hazard, identify the action levels (contaminant concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions;

e) Description of the work habit changes triggered by the above action levels or physical conditions;

f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies;

g) Confined space entry procedures (if applicable);

h) Decontamination procedures;

i) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, plastic sheeting, security guards, etc.);

j) Spill containment/emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;

k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and

l) A page for employees to sign acknowledging that they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. **A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.**

NOTE: These requirements are excerpts from 29 CFR Part 1910.120(b)(4), Hazardous Waste Operations and Emergency Response Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN
The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

a) Scale;

b) North Arrow;

c) Property Lines;

d) Location of all Structures;

e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;

f) Streets;

g) Underground conduits, sewers, water lines, utilities;

h) Existing wells (drinking, monitoring, etc.);

i) Depth to ground water; and

j) All existing tank(s) and piping in addition to the tank(s) being removed.

20. DEPOSIT
A deposit, payable to "County of Alameda" for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from this office or from the San Francisco Bay Regional Water Quality Control Board (510/286-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT
The tank closure report should contain the following information:

a) General description of the closure activities;

b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;

d) Detailed description of sampling methods; i.e. backhoe bucket, drive sampler, bailer, bottle(s), sleeves

e) Description of any remedial measures conducted at the time of tank removal;

f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;

g) Chain of custody records;

h) Copies of signed laboratory reports;

i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and

j) Documentation of the disposal of/and volume and final destination of all non-manifested contaminated soil disposed offsite.

TABLE #2
RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR UNDERGROUND TANK LEAKS

HYDROCARBON LEAK	SOIL ANALYSIS	WATER ANALYSIS
Unknown Fuel	TPH G GCFID(5030) TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) TPH D GCFID(3510) BTX&E 602, 624 or 8260
Leaded Gas	TPH G GCFID(5030) BTX&E 8020 OR 8240 TPH AND BTX&E 8260 TOTAL LEAD AA ------Optional------- TEL DHS-LUFT EDB DHS-AB1803	TPH G GCFID(5030) BTX&E 602 or 624 TOTAL LEAD AA TEL DHS-LUFT EDB DHS-AB1803
Unleaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) BTX&E 602, 624 or 8260
Diesel, Jet Fuel and Kerosene	TPH D - GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Fuel/Heating Oil	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Chlorinated Solvents	CL HC 8010 or 8240 BTX&E 8020 or 8240 CL HC AND BTX&E 8260	CL HC 601 or 624 BTX&E 602 or 624 CL HC AND BTX&E 8260
Non-chlorinated Solvents	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602 or 624 TPH and BTX&E 8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G GCFID(5030) TPH D GCFID(3550) TPH AND BTX&E 8260 O & G 5520 D & F BTX&E 8020 or 8240 CL HC 8010 or 8240 ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni METHOD 8270 FOR SOIL OR WATER TO DETECT: PCB* PCP* PNA CREOSOTE	TPH G GCFID(5030) TPH D GCFID(3510 O & G 5520 B & F BTX&E 602, 624 or 8260 CL HC 601 or 624 PCB PCP PNA CREOSOTE

* If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.

2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.

3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.

4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.

5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydro- carbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.

6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).

7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).

8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. **Standard Methods" 17th Edition, 1989, has changed the 503 series to 5520.**

9. **PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:**

	SOIL PPM	WATER PPB
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&E	0.005	0.5
O & G	50.0	5,000.0
PNA's - 8270	1ppm	1ppb
MTBE - 8260		5ppb

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

ROUTINE	MODIFIED PROTOCOL
≤ 10 ppm (42%)	≤ 10 ppm (10%)
≤ 5 ppm (19%)	≤ 5 ppm (21%)
≤ 1 ppm (35%)	≤ 1 ppm (60%)

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

10. LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.

11. IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

    The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chroma- togram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

12. REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.

ALAMEDA COUNTY ENVIRONMENTAL PROTECTION DIVISION

DECLARATION OF SITE ACCOUNT REFUND RECIPIENT

There may be excess funds remaining in the Site Account at the completion of this project. The PAYOR (person or company that issues the check) will use this form to predesignate another party to receive any funds refunded at the completion of this project. In the absence of this form, the PAYOR will receive the refund.

SITE INFORMATION:

Site ID Number
(if known)

Vogue Tires/Dodson Ltd.
Name of Site

240 West MacArthur Boulevard
Street Address

Oakland, CA 94611
City, State & Zip Code

I designate the following person or business to receive any refund due at the completion of all deposit/refund projects:

All Environmental, Inc.
Name

3364 Mt. Diablo Boulevard
Street Address

Lafayette, CA 94549
City, State & Zip Code

Signature of Payor

9/5/96
Date

All Environmental, Inc.
Name of Payor
(PLEASE PRINT CLEARLY)

Company Name of Payor

RETURN FORM TO:

County of Alameda, Environmental Protection
1131 Harbor Bay Parkway, Rm 250
Alameda CA 94502-6577
Phone#(510) 567-6700

rev.4/6/95;closure.pln\RW

HEALTH AND SAFETY PLAN

Prepared for:

240 West MacAurthur Boulevard
Oakland, CA 94611

Corporate Headquarters:

3364 Mt. Diablo Blvd.
Lafayette, CA 94549
Phone: (510) 283-6000

Los Angeles Office:

111 N. Sepulveda Blvd., #250
Manhattan Beach, CA 90266
Phone: (310) 328-8878

A. INTRODUCTION

This Site Specific Health and Safety Plan is written for the tank removal project located at 240 West MacAurthur Boulevard, Oakland, California. All job site personnel will follow CAL OSHA safe operating practices as outlined in 29 CFR 1910 and 1926, as well as established guidelines set forth by All Environmental, Inc. or their respective companies.

B. WORK DESCRIPTION

Prepared by: Jennifer Anderson, Project Manager

Site Manager: Dusty Roy

Address: 240 West MacAurthur Boulevard
Oakland, CA

Scope of Work: All Environmental, Inc. (AEI) will remove (1) 500 gallon waste oil underground storage tank located at the above address. The tank will be emptied, removed and disposed of according to federal, state and local regulations. Soil samples will be taken from the native material, two feet below the center of the tank, and from the stockpiled material. The excavation will be backfilled and resurfaced to match the surrounding conditions.

C. SITE/WASTE CHARACTERISTICS

Hazard Level:	Serious:	Low: XXX
	Moderate: XXX	Unknown:

Waste Type:	Solid:	Underground Storage Tank
	Sludge:	None
	Liquid:	Remaining Product Inside Tank
	Gas:	None

Hazard Characteristics: Combustible, Toxic

There will be a three feet boundary surrounding the excavation pit and the stockpiled material. The area within this boundary is considered an exclusion zone and only qualified personnel will be allowed to enter. All personnel arriving or departing the site should log in before entering the exclusion zone. All activities on site must be cleared through the Site Manager.

D. HAZARD EVALUATION

Potential chemical hazards include skin and eye contact or inhalation exposure to potentially toxic concentrations of hydrocarbon vapors. The potential toxic compounds that may exist at the site are listed below with descriptions of specific health effects of each. The list includes the primary potential toxic constituents that may be found at sites which previously handled petroleum hydrocarbons, including home heating diesel fuel.

1. Benzene
   a. Colorless to light yellow, flammable liquid with an aromatic odor.
   b. Toxic hazard by **inhalation**, **adsorption**, **ingestion** and **skin and/or eye contact**.
   c. Exposure may irritate eyes, nose and respiratory system and may cause acute restlessness, convulsions, nausea, or depression. Benzene is carcinogenic.*
   d. Permissible exposure level (PEL) for a time weighted average (TWA) over an eight hour period is 1.0 ppm.

2. Toluene
   a. Colorless liquid with a sweet, pungent, benzene like odor.
   b. Toxic hazard by **inhalation**, **adsorption**, **ingestion** and **skin and/or eye contact**.
   c. Exposure may cause fatigue, weakness, confusion, euphoria, dizziness, headaches, dilated pupils, lacrimation, nervousness, insomnia, paresthesia, and dermatitis.
   d. Permissible exposure level for a time weighted average over an eight hour period is 100 ppm.

3. Xylene
   a. Colorless liquid with an aromatic odor.
   b. Toxic hazard by **inhalation**, **adsorption**, **ingestion** and **skin and/or eye contact**.
   c. Exposure may irritate eyes nose and throat and may cause dizziness, excitement, drowsiness, incoordination, corneal vacuolization, anorexia, nausea, vomiting, and dermatitis.
   d. Permissible exposure level for a time weighted average over an eight hour period is 100 ppm.

4. Ethylbenzene
   a. Colorless liquid with an aromatic odor.
   b. Toxic hazard by **inhalation**, **ingestion**, and **skin and/or eye contact**. Ethylbenzene is carcinogenic.*
   c. Exposure may irritate eyes and mucous membrane and may cause headaches, dermatitis, narcosis and loss of consci ousness.
   d. Permissible exposure level for a time weighted average over an eight hour period is 100 ppm.

*** Known to the State of California to cause cancer.**

5. Lead
   a. A heavy ductile soft grey metal.
   b. Toxic hazard by **inhalation**, **ingestion**, and **skin and/or eye contact**.
   c. Exposure may cause weakness, nausea, lassitude, diarrhea, insomnia, anorexia, inflamed mucous membranes and abdominal pains. Lead is carcinogenic.*
   d. Permissible exposure level for a time weighted average over an eight hour period is .05 ppb (in vapor).

6. Diesel
   a. Colorless to dark brown, combustible liquid with an aromatic odor
   b. Toxic hazard by **inhalation**, **ingestion**, **skin and/or eye contact**.
   c. Inhalation of vapors may depress the central nervous system, increasing reaction times, and decreasing pulse rate and blood pressure. Skin irritant.
   d. Occupational exposure limit 5.0 ppm (in vapor).

7. Gasoline
   a. Colorless liquid with a strong aromatic odor. Highly volatile and extremely flammable.
   b. Toxic hazard by **inhalation**, **adsorption**, **ingestion** and **skin and/or eye contact**.
   c. Inhalation of vapors can cause depression of the central nervous system with symptoms such as headache, dizziness, nausea and loss of coordination. Skin contact can cause defatting of the skin, skin irritation and dermatitis. Benzene is a major constituent of gasoline.
   d. Permissible exposure level for a time weighted average over an eight hour period is 300 ppm.

8. Waste Oil
   a. Toxic hazard by **ingestion** and possibly **inhalation.**
   b. Prolonged contact may cause skin irritation and dermatitis. Waste oil may be carcinogenic.*
   c. Waste oil may contain metals or toxic organics from thermal breakdown of the oil. In some cases, chlorinated solvents may be present.
   d. Permissible exposure level for a time weighted average over an eight hour period is 5 ppm (in vapor).

*** Known to the State of California to cause cancer.**

Dusty Roy has been designated to coordinate access control and security on site. All work will strictly follow OSHA guidelines. A safe perimeter has been established at a three feet radius surrounding the site. These boundaries are identified by yellow caution tape and orange safety cones. Personnel shall maintain the maximum distance from the pit while performing their duties. No one shall enter an excavation pit that is greater than five feet in depth unless the excavation is shored or sloped and no one shall climb on the stockpiled material except to cover it with plastic. Additional hazards on site include heavy equipment and overhead lifting equipment. Heavy equipment used for performing the tank removal project may include a backhoe, an excavator, or a crane for lifting the tank out of the excavation. Only 40 hour trained personnel will operate equipment or perform any duty associated with this project. A hard hat and steel toed boots are mandatory for all personnel associated with the tank removal.

A FIRST AID KIT AND A 40 POUND BC FIRE EXTINGUISHER WILL BE AVAILABLE ON SITE.
EMERGENCY SERVICES ARE AVAILABLE BY DIALING **911** ON THE TELEPHONE LOCATED IN THE SITE MANAGER'S VEHICLE. THIS VEHICLE WILL BE ON SITE AT ALL TIMES.

E. PERSONAL PROTECTIVE CLOTHING

Based on evaluation of potential hazards, level "D" protective clothing has been designated as the appropriate protection for this project. The level of protective clothing will be upgraded if the organic vapor levels in the operator's breathing zone exceeds 5 ppm above background levels continuously for more than five minutes, or if any single reading exceeds 25 ppm. If this occurs then level C protection will be used. If the organic concentration in the operator's breathing zone exceed's 200 ppm for 5 minutes and/or the organic vapor concentration two feet above the excavation exceeds 1,000 ppm or 10% of the lower explosive limit, then the equipment will be shut down and the site evacuated. If organic vapor concentrations exceed 200 ppm and work continues then level B protection will be required.

"EPA Standard Operating Safety Guidelines" defines the levels of protective clothing as follows:

LEVEL A:
Fully encapsulating suit / SCBA / Hard hat / Steel toe boots / Safety gloves.

LEVEL B:
Splash resistant suit / SCBA / Hard Hat / Steel toe boots / Safety gloves.

LEVEL C:
Half face respirator / Hard hat / Safety glasses / Steel toe boots / Coveralls / Gloves.

LEVEL D:
Coveralls / Hard hat / Safety Glasses / Steel toe boots / Gloves.

If air purifying respirators are authorized, organic vapor w-filter is the appropriate canister for use with the involved substances and concentrations. A competent individual has determined that all criteria for using this type of respiratory protection have been met.

NO CHANGES TO THE SPECIFIED LEVELS OF PROTECTION SHALL BE MADE WITHOUT THE APPROVAL OF THE COMPANY SAFETY OFFICER, J. S. ANDERSON.

F. MONITORING INSTRUMENTS

The following environmental monitoring instruments shall be used on site at specified intervals.

Lower Explosive Limit (LEL) Meter that will also check the tank for Oxygen levels will be used to check the tank for removal and transportation.

G. EMERGENCY HOSPITAL

The closest hospital with an emergency room is:

Kaiser Foundation Hospital (510) 596-1000

DIRECTIONS FROM THE JOB SITE:

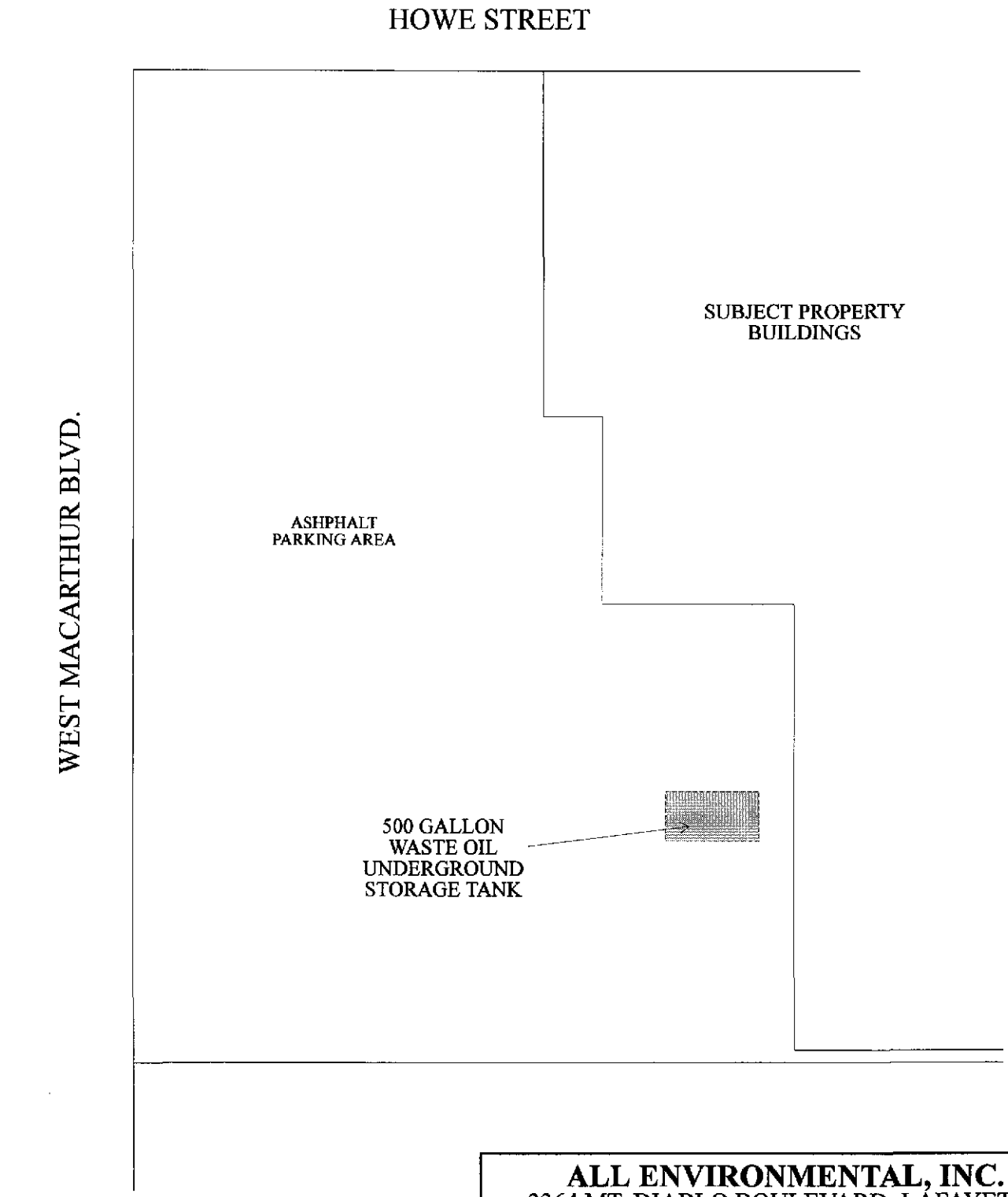
EXIT JOBSITE AND GO:

HOSPITAL LOCATED AT 280 WEST MACARTHUR BLVD.

H. READ AND SIGN

The work party was briefed on the contents of this plan on _____ at 8:00 am. All site personnel have read the above plan and are familiar with its provisions.

NAME:	SIGNATURE:	COMPANY NAME:



ALL ENVIRONMENTAL, INC.
3364 MT. DIABLO BOULEVARD, LAFAYETTE

SCALE: NOT TO SCALE	APPROVED BY:	DRAWN BY: J.S. ANDERSON
DATE: 4 SEPTEMBER 96		REVISED: J.S. ANDERSON

SITE PLAN

240 WEST MACARTHUR BLVD. OAKLAND, CALIFORNIA	DRAWING NUMBER: FIGURE 1