SENT 6-26-200

### ALAMEDA COUNTY HEALTH CARE SERVICES



DAVID J. KEARS, Agency Director



20144

ENVIRONMENTAL HEALTH SERVICES

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

StID 1773

June 23, 2000

Mr. Gregory Baum Harsh Investment Corp. P.O.Box 2708 Portland, OR 97208

RE: Well Decommission at Park Street and Shoreline, Alameda, CA

Dear Mr. Baum:

This office and the San Francisco RWQCB have reviewed the case closure summary for the above referenced site and concur that no further action related to the underground tank release is required at this time. Before a remedial action completion letter is sent, the on-site and off-site groundwater monitoring wells (24 wells) should be decommissioned, if they will no longer be monitored. Please notify this office upon completion of well destruction so a closure letter can be issued.

Well destruction permits may be obtained from Alameda County Public Works. They can be reached at (510) 670-5248.

If you have any questions, I can be reached at (510) 567-6762.

Sincerely,

eva chu

Hazardous Materials Specialist

c: Murray Stevens, 2351 Shoreline Drive, Alameda, CA 94501

soshore-2

sestill-2-99 including oa's

#### ALAMEDA COUNTY

#### HEALTH CARE SERVICES

#### **AGENCY**



DAVID J. KEARS, Agency Director

ROIM

ENVIRONMENTAL HEALTH SERVICES

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

(510) 337-9335 (FAX)

StID 1773

November 1, 1999

Mr. Gregory Baum Harsh Investment Corp. P.O.Box 2708 Portland, OR 97208

RE:

Project #913B, Add-on

at 2351 Shoreline Dr., Alameda, CA

Dear Mr. Baum:

As you know, this office is overseeing site remediation due to petroleum hydrocarbons and chlorinated hydrocarbons at the above referenced site. The petroleum hydrocarbon impacted areas (former Texaco and former car wash sites) are currently under review for closure/no further action by this agency. However, the former dry cleaner area still contain chlorinated solvents in groundwater exceeding the maximum contaminant levels (MCLs) for drinking water. The Regional Water Quality Control Board does not close sites with solvents above MCLs. Therefore, this agency will continue with oversight of the former dry cleaners.

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$2500.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter. It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$100 per hour.

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

project #913B/ Stid #3781 type of project (remediation, add-on), and site address (2351 Shoreline Dr., Alameda, CA)

If you have any questions, please contact me at (510) 567-6762.

eva chu

Hazardous Materials Specialist

soshore-drycleaners-1

#### **HEALTH CARE SERVICES**

**AGENCY** 



DAVID J. KEARS, Agency Director

RO# 144

StID 1773

February 3, 1998

Mr. Murray Stevens 2351 Shoreline Dr Alameda, CA 94501 **ENVIRONMENTAL HEALTH SERVICES** 

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

RE: Risk Assessment for 2351 Shoreline Dr. Alameda, CA

Dear Mr. Stevens:

The South Shore Shopping Center, located at the above referenced address, had experienced the release of petroleum hydrocarbons and chlorinated hydrocarbons to the subsurface from three different sites/sources: the Former Texaco Service Station, the Former Chevron Carwash/Service Station, and the Former Dry Cleaners. Each site conducted their own subsurface investigation beginning in 1989 and 1990.

The former Chevron site was impacted by petroleum hydrocarbons from leaking underground storage tanks. Approximately 1,500 cubic yards of contaminated soil were excavated and removed from the tank pit. Confirmatory soil samples collected from the sidewalls at ~6'bgs contained up to 20,000 ppm TPHg and 400 ppm benzene in sample S-3-6, and up to 6,600 ppm TPHg and 17 ppm benzene in sample S-9-6. Exploratory borings were drilled around the excavation pit to delineate the extent of soil contamination. The soil sample from boring B-9-6 contained 11,000 ppm TPHg and 220 ppm benzene. And soil from boring B-2-6 contained 4,700 ppm TPHg and 16 ppm benzene. These residual concentrations remain in the southeast and northeast corners of the former excavation.

In 1997 a risk assessment was performed to evaluate risk from volatilization of chemicals of concern (BTEX) from groundwater to indoor and outdoor air to onsite and offsite commercial workers. It was determined that the benzene concentrations in groundwater would not pose a risk for the above exposure routes. In addition, it was determined that the contaminant plume would not migrate to the nearest surface water, even after 30 years.

The above mentioned risk assessment did not evaluate risk due to residual soil contamination. At this time, soil volatilization to both indoor and outdoor air exposure pathways should be evaluated. This may be done by collecting soil gas vapors with Summa canisters and/or possibly by performing a risk analysis using the Tier 2 Risk-Based Corrective Action approach. A workplan for risk determination should be submitted to this office for review.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

c: Frank Hamedi, STE, 298 Brokaw Rd, Santa Clara, CA 95050 Greg Baum, Harsch Investment Corp, P.O. Box 2708, Portland, OR 97208

soshore.2

AGENCY

DAVID J. KEARS, Agency Director



2357 SHORELINE DR.

R0#144

**ENVIRONMENTAL HEALTH SERVICES** 

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

May 5, 1997

Mr. Murray Stevens 2351 Shoreline drive, Alameda, CA - 94501

STID# 1773

Ref: South Shore Shopping Center located at corner of Park Street and Shore Line Drive, Alameda, CA

Dear Mr. Stevens:

I am in receipt of the document, "Human Health Risk Assessment", dated March 7, 1997 prepared by Soma Environmental for the former car wash area located in the referenced property. This Department has reviewed the risk assessment and has identified the following concerns which need to be addressed:

- Please give us a rationale as to why average concentrations on site were used to simulate initial conditions for the MT3D Model as opposed to using initial concentrations identified on site (1991 data) and extrapolating this data to simulate present and future conditions.

  Also, using initial concentrations may help confirm the accuracy of the model based on predictions that are made of present conditions.
- Please provide us with reference/literature for air exchange rate values used in the risk evaluation.
- Since the site has shallow groundwater, it is imperative that the construction scenario which was not included in the risk assessment, be evaluated to calculate risk due to dermal contact with groundwater.
- Air filled porosity was assumed to be 30% of the total porosity. In ASTM RBCA, the air filled porosity is assumed to be 68% of the total porosity. Hence please give a rationale for the percentage used to calculate the air filled porosity. This Department recommends that site specific moisture content be measured to get accurate results.
- As mentioned in my letter, dated May 1, 1997, the figures submitted by Soil Tech do not include monitoring well MW-24, which is identified in Kleinfelder's reports. Hence the data from this monitoring well and data from other pertinent wells (irrespective of the responsible party that installed it) should be taken into consideration in performing the risk evaluation.

Please provide an amended risk assessment addressing the above listed issues within 30 days from the date of this letter. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Machulla Logan

Hazardous Material Specialist

Greg Baum, Harsch Investment Corporation, P.O. Box 2707, Portland, Oregon - 97208

Frank Hamidi, Soil Tech Engineering, 1761 Junction Avenue, San Jose, CA - 95112

Alan Gibbs, Kleinfelder, 7133 Koll Center Parkway, Suite 100, Pleasanton, CA - 94566

Mansour Sepehr, Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203, San Ramon, CA - 94589

Ma. Deborah Privor, Tevaco Refining and Marketing, Inc., 10 Universal City Plaza, 7th floor,

Ms. Deborah Pryor, Texaco Refining and Marketing, Inc., 10 Universal City Plaza, 7th floor, Universal City, CA - 91608

AGENCY

DAVID J. KEARS, Agency Director



2351 SHORBLINE DR. ALAMEDA CA

Ro# 144

ENVIRONMENTAL HEALTH SERVICES

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

May 1, 1997

Mr. Greg Baum
Harsch Investment Corporation
P.O Box 2708,
Portland, Oregon- 97208

Mr. Murray Stevens 2351 Shoreline Drive, Alameda, CA - 94501

Ms. Deborah Pryor
Texaco Refining and Marketing, Inc
10 Universal City Plaza, 7th floor
Universal City, CA - 91608

Ref: South Shore Shopping Center, located at corner of park street and shore line drive, Alameda CA STID # 1773

Dear Mr. Baum, Mr. Stevens, and Ms. Pryor:

In the process of evaluating the referenced site for closure based on pertinent information submitted, including the risk assessment for Texaco that is pending submittal, we noted that the well location maps submitted by Kleinfelder and Soil Tech Engineering (Soil Tech) are not consistent with each other. The figures submitted by Soil Tech do not include monitoring well MW-24, which is identified in Kleinfelder's reports. All of Kleinfelder's reports do not include monitoring well MW-5 which is identified in Soil Tech's reports. Also, the well numbering scheme used for the monitoring wells differ in the documents submitted by Kleinfelder and Soil Tech.

It is imperative that this department maintain documents that are complete and factual since they are open for public review. Hence to complete the closure review, this Department recommends that you (all parties) submit the following information:

- a well location map that contains all the monitoring well locations with a consistent well numbering scheme
- tables showing the analytical results for historical sampling of all the monitoring wells on site.

Also, please make sure that the consultants who are involved in preparing the risk assessment and/or risk management plans have a copy of the amended data.

If you have any questions, you may reach me at (510) 567-6764

Sincerely,

Madhulla Logan

Hazardous Material Specialist

C: Frank Hamidi: Soil Tech Engineering, 1761 Junction Avenue, San Jose, CA - 95112 Alan Gibbs, Kleinfelder, 7133 Koll Center Parkway, Suite 100, Pleasanton, CA - 94566 Mansour Sepehr, Environmental Engineering, Inc 2680 Bishop Drive, Suite 203, San Ramon, CA - 94583



AGENCY

ALAMEDA . CA

2351 SHORFLINE DR.

V RO#144 (LOP)

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

Ro# 2636 (SUC)

December 31, 1996

Mr. Greg Baum
Harsch Investment Corporation
P.O Box 2708,
Portland, Oregon, - 97208

DAVID J. KEARS, Agency Director

STID#

1773

Ref: South Shore Shopping Center, located at Park Street, and Shore Line Drive, Alameda, CA.

Dear Mr. Baum:

This Department is in receipt of the document "Risk Management Plan", dated December 18, 1996 which was submitted in response to a request from this Department in a letter dated November 6, 1996. This risk management plan has been prepared to address any concerns due to the remaining residual contamination that may be present in the south/southwest half of the referenced site.

Based on the review of all pertinent documents submitted to this department and with the provision that the information provided to this agency is accurate and representative of site conditions, no further action is required on the south/southwest half of the referenced site. However, if current land use (commercial) changes, then additional evaluation may be needed.

If you have any questions, you may reach me at (510) 567-6764

Sincerely,

Madhulla Logan

Hazardous Material Specialist

C: Kleinfelder, 7133 Koll Center Parkway, Suite 100 Pleasanton, CA - 94566

**AGENCY** 



DAVID J. KEARS, Agency Director

VRO# 144 CWP)

RO# 2636 (SUC)

November 6, 1996

Murray Stevens

✓ 2351 Shoreline drive,
Alameda, CA - 94501

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

FAX (510) 337-9335

STID# 1773

Ref:

South Shore Shopping Center located at corner of Park Street and Shore Line Drive,

Alameda, CA

SECOND NOTICE OF VIOLATION

Dear Mr. Stevens:

On April 26, 1996, a letter was sent from this Department requesting that you submit a workplan to define and remediate the contamination that has been found in the monitoring wells, MW-10, MW-24, MW-25 and MW-12. As of this date we have not received any communication from you on this matter. Therefore, this letter constitutes a <u>Second Notice</u> that you are in violation of specific laws and that the workplan is due.

At this time, pursuant to Section 2720 et seq, Article 11, Title 23, California Code of Regulations, you are hereby requested to develop a Corrective Action Plan (CAP) for further investigation of this site. The corrective action plan should identify and evaluate feasible alternatives for cleanup of soil and groundwater contamination caused by the unauthorized release of petroleum products and to prevent further contaminant migration.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction.

You are required to submit the workplan for the referenced site to this office within 30 days from the date of this letter. Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney to be considered for enforcement action. Modification of required tasks or extensions of stated deadlines must be requested in writing. If you have any questions, you may reach me at (510) 567-6764.

Sincerely.

Machulla Logan

Hazardous Material Specialist

Greg Baum, Harsch Investment Corporation, P.O. Box 270%, Portland, Oregon - 97208
Frank Hamidi, Soil Tech Engineering, 1761 Junction Avenue, San Jose, CA - 95112
Alan Gibbs, Kleinfelder, 7133 Koll Center Parkway, Suite 100, Pleasanton, CA - 94566

### ALAMEDA COUNTY . HEALTH CARE SERVICES

**AGENCY** 

DAVID J. KEARS, Agency Director



235 SHORELINE DR. ALAMEDA, CA.

V RO# 144 (LOP)

RO# 2636 (9UC)

November 6, 1996

Mr. Greg Baum
Harsch Investment Corporation
P.O Box 2708,
Portland, Oregon, - 97208

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP)

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

STID#

1773

Ref: South Shore Shopping Center, located at Park Street, and Shore Line Drive, Alameda, CA.

Dear Mr. Baum:

This Department is in receipt of the risk assessment prepared by Kleinfelder for the above referenced property in behalf of Harsch Investment Corporation. This risk assessment has been prepared to evaluate the potential risks of petroleum hydrocarbons and solvent contamination identified in the monitoring wells located in the south/southwest half of the referenced property. However, the risk assessment does not include the contamination identified in monitoring wells, MW-10, MW-12, MW-23, MW-24 and MW-25 located in the north/northeast half of the site. It was agreed in a meeting held on April 24, 1996 that this portion of the investigation will be conducted by Kamur Industries.

This Department has reviewed the risk assessment document and has found it acceptable for the current use (as a parking lot) in the south/southwest half of the property. The risk assessment evaluated the exposure to the solvent and petroleum hydrocarbons vapors to the outdoor area. The risk assessment did not evaluate the risk due to exposure of vapors to the indoor area as there are no buildings located in this half of the site. However, please note that since the risk assessment is being accepted is based on the current use of the property, the following information is still required before final closure can be granted:

- 1. A risk management plan that is acceptable to the regulatory agencies need to be submitted. This risk management plan should include at a minimum the following information:
  - the extent of the constamination present on the property and methods to mitigate any potential negative impacts posed by any residual contamination on site, like capping the site, using liners, barriers etc.
  - strategy to address any risk posed to the construction workers etc. during earth moving activities, etc.
  - precautions to avoid making vertical or lateral conduits like wells, drainage lines, water supply lines, etc that may cause cross contamination between the shallow and deeper aquifers.
  - Need for re-evaluation if the site use changes to residential, day care, etc.

<u>Please submit the above required information within 30 days of receiving this letter</u>. Please be advised that this is a formal request for technical information pursuant to California Water Code Section 13627 (b). Any extension of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency. If you have any questions, call me at (510) 567-6764.

Sincerely, Marchilla Legour

Madhulla Logan

Hazardous Material Specialist

Alan Gibbs, Kleinfelder, 7133, Koll Center Parkway, Suite 100, Pleasanton, CA - 94566 Frank Hamidi, Soil Tech Engineering, 1761, Junction Ave, San Jose, CA - 95112. Murray Stevens, 2351 Shoreline Drive, Alameda, CA - 94501

AGENCY

DAVID J. KEARS, Agency Director



RO# 144

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

April 26, 1996

Mr. Greg Baum
Harsch Investment Corporation
P.O Box 2708,
Portland, Oregon, - 97208

Mr. Murray Stevens

√ 2351 Shoreline Drive,
Alameda, CA - 94501

STID#

1773

Ref: South Shore Shopping Center, located at Park Street, and Shore Line Drive, Alameda, CA.

Dear Mr. Baum & Mr. Stevens:

This letter is being sent as a follow-up to the meeting that was held on April 24, 1996 with Greg Baum and Alan Gibbs representing Harsch Investment, and Frank Hamidi representing Kamur Industries. Based on the outcome of the meeting it was agreed that the following investigative/remedial work needs to be completed to move the project towards closure:

- A risk assessment to evaluate the potential risk of petroleum hydrocarbons and solvents
  identified in the monitoring wells located in the south/south west half of the referenced
  property, and specifically addressing the contamination that has been recently identified in
  monitoring well, MW-7B.
- A workplan to address the contamination that has been found in the monitoring wells in north/north east half of the site, specifically the high concentrations that appear to be migrating towards and away from monitoring well, MW-24. This Department would require that either a remediation system be installed to clean-up the groundwater contamination and to reduce further migration of petroleum hydrocarbons or that a risk assessment be submitted to evaluate the potential risk of contamination present in the groundwater. Depending on your choice, more investigative work and groundwater monitoring may be required to define the extent of contamination.

<u>Please submit the above required information within 30 days of receiving this letter</u>. Please be advised that this is a formal request for technical information pursuant to California Water Code Section 13627 (b). Any extension of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency. If you have any questions, call me at (510) 567-6764.

Sincerely,

Madhulla Logan

Hazardous Material Specialist

Alan Gibbs, Kleinfelder, 7133, Koll Center Parkway, Suite 100, Pleasanton, CA - 94566 Frank Hamidi, Soil Tech Engineering, 1761, Junction Ave, San Jose, CA - 95112.

SITE ADDRESS: 2351 Shoreline Dr. Alameda . 01 94501

ALAMEDA COUNTY

#### HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

✓ RO 144 (South Shore Car wash)

RO 2636 (Dry Cleaners)

RAFAT A. SHAHID, Assistant Agency Director

September 20, 1994

Gregory H. Baum Harsch Investment Corp. P.O. Box 2708 Portland, Oregon 97208 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Division 80 Swan Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

STID 1773

Re:

Revised Quarterly Ground water Monitoring Program, for South Shore Shopping Center, located at Park Street and Shoreline Drive, Alameda, California

Dear Mr. Baum,

This office has reviewed The Mark Group's (MG) proposal for sampling only six of the 24 site wells for quarterly monitoring, until remediation activites begin at the site. MG's proposal suggests that sampling of these wells (Wells MW-12, MW-16, MW-17, MW-19, MW-22, and MW-25) will be sufficient to identify any fluctuations in ground water contaminant concentrations, however, equally important is the ability of these wells to identify any plume migration off site. Although most of the proposed wells are located along the perimeter of the site, the area along the northeast boundary of the site, in the vicinity of Well MW-23, is not addressed with the proposed six wells. Therefore, monitoring of Well MW-23 shall be included in the sampling plan.

Additionally, please be reminded that the extent of the contaminant plume to the north has not yet been delineated and monitoring of Well MW-25, although acceptable for the time being, will not be able to confirm any further plume migration in this direction. Per our meeting on August 31, 1994, further plume delineation will be conducted in this direction immediately after operation of the vapor extraction system has been initiated for approximately two months.

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

Sincerely

Juliet Shin

Hazardous Materials Specialist

Mr. Gregory H. Baum

Re: South Shore Shopping Ctr.

September 20, 1994 Page 2 of 2

Alan Gibbs cc:

The Mark Group, Inc.

Hookston Square, Ste 120

3480 Buskirk Ave.

Pleasant Hill, CA 94523

Tom Hargett

Texaco Refining and

Marketing Inc.

10 Universal City Plaza

7th Floor

Universal City, CA 91608 7812

Murray Stevens

2351 Shoreline Drive Alameda, CA 94501

Edgar Howell

VROITE (LOP)

## ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST, AGENCY DIRECTOR

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

September 2, 1993

Mr. Robert Leste Harsch Investment Corp. 235 W. MacArthur Blvd., Ste 630 Oakland, CA 94111

STID 1773

Re: Required remediation at South Shore Shopping Center, Alameda, California

Dear Mr. Leste,

In June 1993 this office reviewed and approved Clayton Environmental's work plan for interim remediation at the above site. This work plan included a timetable for scheduled work events, however, after our review of the work plan, Harsch Investment requested an extension for the scheduled start-up date of the remediation system to allow time for the acquisition of the BAAQMD and EBMUD permits. The new due date for implementing the remediation system at the site was established to be August 11, 1993 in a County letter, dated June 11, 1993. To this date, no work has begun at the site, and no additional requests have been made for extensions of the assigned due date.

Per a conversation with Mr. Tony McElligott, Clayton Environmental, on September 2, 1993, the BAAQMD permit has been obtained and the EBMUD permit has essentially been obtained. There appears to be no obstacles in the way to initiate the work at the site. You are required to begin implementing the work plan at the site immediately. Additionally, this office is requesting that you submit a revised timetable for scheduled work events to this office within 10 days of the date of this letter.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Anthony S. McElligott

Clayton Environmental Services

1252 Quarry Lane

P.O. Box 9019

Pleasanton, CA 94566

Mr. Robert Leste Re: South Shore Shopping Center September 2, 1993 Page 2 of 2

> Mr. Murray Stevens 2351 Shoreline Drive Alameda, CA 94501

Mr. Robert Robles Texaco Refining and Marketing, Inc. 10 Universal City Plaza, 13th Floor Universal City, CA 91608

DAVID J. KEARS, Agency Director

R02636 (SLIC)

v RO144 (LOP)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

June 11, 1993

Mr. Bernard Levy Harsch Investment Corp. 235 W. MacArthur Blvd., Ste 630 Oakland, CA 94111

STID 1773

Work plan for South Shore Shopping Center, Alameda, California

Dear Mr. Levy,

This office has reviewed Clayton Environmental's work plan, dated June 4, 1993, for the above site. This work plan is acceptable to this office.

Per my conversation with Mr. Tony McElligott, Clayton Environmental, on June 11, 1993, it will take a maximum of two months to obtain permits from the Bay Area Air Quality Management District (BAAQMD) and East Bay Municipal Utilities District (EBMUD) for the proposed interim remediation system. Apparently, this permitting step was not taken into consideration during the preparation of the proposed timetable given in the work plan. is the understanding of this office that after the permitting process, the various work steps will be implemented within the same time periods as proposed in the Schedule of Remediation, except for the Phase I Interim Remediation which will be conducted during a period of three months, instead of four months, per my conversation with Mr. McElligott.

The permitting process for the proposed interim remediation system should begin immediately, and construction of the remediation system should be completed by the time the permits are granted by BAAQMD and EBMUD. The work plan shall be implemented, as scheduled, immediately after obtaining the required permits for the system.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Mr. Bernard Levy

Re: South Shore Shopping Center

June 11, 1993 Page 2 of 2

#### cc: Richard Hiett, RWQCB

Anthony S. McElligott Clayton Environmental Services 1252 Quarry Lane P.O. Box 9019 Pleasanton, CA 94566

Mr. Frank Hamedi Soil Tech Engineering 298 Brokaw Road Santa Clara, CA 95050

Mr. Robert Robles Texaco Refining and Marketing, Inc. 10 Universal City Plaza, 13th Floor Universal City, CA 91608

DAVID J. KEARS, Agency Director

R02636 (SLIC) V RO144 (LOP)

RAFAT A. SHAHID, ASST, AGENCY DIRECTOR

April 23, 1993

Mr. Bernard Levy Harsch Investment Corp. 235 W. MacArthur Blvd., Ste 630 Oakland, CA 94111

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

STID 1773

Remediation work plan for South Shore Shopping Center, Alameda, Re: California

Dear Mr. Levy,

Per our conversation on April 23, 1993, the due date for any work plans addressing remediation for the above site has been extended to May 20, 1993. Additionally, per our conversation, I will be kept updated in the interim as to the status of this work plan.

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

Sincerelv.

Juliet Shin

Hazardous Materials Specialist

Richard Hiett, RWQCB cc:

> Dariush Dastmalchi Clayton Environmental Services 1252 Quarry Lane P.O. Box 9019

Pleasanton, CA 94566

Mr. Frank Hamedi Soil Tech Engineering 298 Brokaw Road Santa Clara, CA 95050

Mr. Robert Robles Texaco Refining and Marketing, Inc. 10 Universal City Plaza, 13th Floor Universal City, CA 91608

/ RO144 (LOP)

SITE: 035) Shoreline Dr. Alameda : CA

Ro 2636 (suc)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs **UST Local Oversight Program** 80 Swan Way, Rm 200 Oakland, CA 94621

(510) 271-4530

DAVID J. KEARS, Agency Director

February 8, 1993

Mr. Bernard Levy Harsch Investment Corp. 235 W. MacArthur Blvd., Ste 630 Oakland, CA 94111

STID 1773

Work plan for South Shore Shopping Center, located at Park Re: Street and Shoreline Drive, Alameda

Dear Mr. Levy,

This office has reviewed Clayton Environmental's work plan, dated January 27, 1993, for the installation of two additional monitoring wells at the above site. This work plan is acceptable to this office with the following requirements/reminders:

- A minimum of one soil sample, from each of the borings, shall be analyzed; and
- o The wells shall be screened adequately above the water table to account for seasonal fluctuations.

Additionally, it is the understanding of this office that Harsch Investment will analyze the ground water samples collected from the proposed Kamur Industries wells for chlorinated hydrocarbons.

Per the conversation between Dariush Dastmalchi, Clayton Environmental, and myself on February 8, 1993, this work plan shall be implemented on February 9, 1993. A report detailing this work shall be submitted to this office within 45 days after completing the field activities.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Mr. Bernard Levy

Re: South Shore Shopping Center

Page 2 of 2

February 8, 1993

#### cc: Richard Hiett, RWQCB

Dariush Dastmalchi Clayton Environmental Services 1252 Quarry Lane P.O. Box 9019 Pleasanton, CA 94566

Mr. Frank Hamedi Soil Tech Engineering 298 Brokaw Rd. Santa Clara, CA 95050

R02636 (suc) VR0144 (LOP)

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

February 1, 1993

Murray T. Stevens Kamur Industries 2351 Shoreline Dr. Alameda, CA 94501

STID 1773

RE: Work plan for the installation of two additional wells for the property located at 2351 Shoreline Drive, Alameda, California

Dear Mr. Stevens,

This office has received and reviewed the January 27, 1993 letter from Soil Tech Engineering summarizing the proposal for the installation of two additional monitoring wells at the above site. This workplan is acceptable to this office with the following requirements/reminders:

- o These wells shall be analyzed for all the same constituents as the already existing wells at your site, including the VOC compounds. Per our meeting on January 21, 1993, it is the understanding of this office that Harsch Investment will be financing the cost of the VOC analysis.
- o Soil samples shall be collected at 5-foot depth intervals and at changes in lithology. A minimum of one soil sample from each boring shall be analyzed for all the same constituents that are being analyzed for in the existing wells.
- o It is the understanding of this office that all the monitoring wells at South Shore Shopping Center shall be surveyed to a common benchmark. The two proposed wells shall also be surveyed to this common benchmark, to an accuracy of 0.01 foot.
- o The monitoring wells shall be screened adequately above and below the water table ( standard requirements are five feet above and 10 feet below water table).
- o Subsequent to well development, you must wait at least 24 hours before collecting samples from these wells.

Mr. Murray Stevens

Re: 2351 Shoreline Drive

Page 2 of 2

February 1, 1993.

o Quarterly monitoring of these wells shall continue until this site qualifies for RWQCB "sign-off". A report detailing the installation of these wells shall be submitted within 45 days of the completion of field activities.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Bernard Levy

Harsch Investment Corp.

235 W. MacArthur Blvd., Ste 630

Oakland, CA 94111

SITE: 2351 Shoreline Dr. Alameda . Ch

State Water Resources Control Board

Division of Clean Water Programs **UST Local Oversight Program** 80 Swan Way, Rm 200

R0144

Oakland, CA 94621

(510) 271-4530

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR DEPARTMENT OF ENVIRONMENTAL HEALTH

December 29, 1992

DAVID J. KEARS, Agency Director

Bernard Levy Harsch Investment Corp. 235 W. MacArthur Blvd., Ste 630 Oakland, CA 94111

STID 1773

South Shore Shopping Center, located at Park Street and RE: Shore Line Drive, Alameda, California

Dear Mr. Levy,

This office has reviewed the letter from Clayton Environmental, dated December 23, 1992, requesting a waiver for the requirement to install a well east of MW-9 based on the results of the tank removal in May 1990. According to the information provided, it appears that no further investigations are required for the former 500-gallon waste oil underground storage tank at this time. However, according to Woodward-Clyde's Phase II Site Exploration report, dated July 1989, up to 340 ppm Oil and Grease was identified in soil samples collected from borings placed beneath the Good Year building. Additionally, ground water samples collected from wells in the vicinity of the Good Year building, such as well MW-9 and Chevron's wells, have consistently identified contamination. Therefore, this office is still requiring that you install the monitoring well to determine whether ground water has been impacted east of the Good Year building. A work plan for the installation of this well shall be submitted to this office by March 1993.

Ground water samples from this well shall initially be analyzed for Oil and Grease, Volatile Organic Compounds (VOCs), Total Petroleum Hydrocarbons as gasoline (TPHg), and benzene, toluene, xylenes, and ethylbenzene (BTEX).

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Mr. Bernard Levy RE: South Shore Shopping Center December 29, 1992 Page 2 of 2

cc: Richard Hiett, RWQCB

Alan D. Gibbs Clayton Environmental Consultants 1252 Quarry Lane P.O. Box 9019 Pleasanton, CA 94566

DAVID J. KEARS, Agency Director

STID: 1773 SITE: 2351 Shoreline Dr. Alameda, CA

R0144

80 Swan Way, Rm 200 Oakland, CA 94621

(510) 271-4530

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

State Water Resources Control Board Division of Clean Water Programs **UST Local Oversight Program** 

November 19, 1992

Bernard M. Levy Harsch Investment Corporation 235 West MacArthur Blvd., Ste 630 Oakland, CA 94611

STID 1773

Dear Mr. Levy,

As promised in our November 18, 1992 meeting, here is a copy of Article 11, Title 23 California Code of Regulations.

If you have any questions regarding these regulations, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

STID: 1773 STIE: 2351 Shoreline Dr. Alameda. 94

R0144

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 80 Swan Way, Rm 200

> Oakland, CA 94621 (510) 271-4530

DAVID J. KEARS, Agency Director

November 19, 1992

Michael Dosen Harsch Investment Corporation 235 West MacArthur Blvd., Ste 630 Oakland, CA 94611

STID 1773

Dear Mr. Dosen,

As promised in our November 18, 1992 meeting, here is a copy of Article 11, Title 23 California Code of Regulations.

If you have any questions regarding these regulations, please contact me at (510) 271-4530.

Sincerely

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

STID: 1773 SITE: 2351 Shoreline Dr. Alameda. CA

R0144

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

November 19, 1992

Frank Hamedi Soil Tech Engineering, Inc. 298 Brokaw Rd. Santa Clara, CA 95050

STID 1773

Dear Mr. Hamedi,

I have made a copy of Article 11, Title 23 California Code of Regulations for Mr. Murry Stevens, however, I did not have his address. Please forward this copy to Mr. Stevens.

Thank you for your cooperation. If you have any questions regarding these regulations, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

## HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0144

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

October 9, 1992

Mr. Mike Dosen Vice President HARSCH INVESTMENT CORPORATION 235 W. MacArthur Boulevard Oakland, CA 94611

STID 1773

RE: The South Shore Shopping Center site, Alameda, California

Dear Mr. Dosen,

The case file for the above site has been reassigned to another Hazardous Materials Specialist, Juliet Shin.

According to this Department's files, investigations for releases from former underground storage tanks at the site have been ongoing since 1989. It appears that investigations at the site are divided into three areas: the former Chevron station, the former Texaco station, and the former dry cleaners.

The investigations to date have revealed soil and ground water contamination in all three areas. Four monitoring wells, STMW-1, STMW-2, STMW-3, and STMW-4, have been installed and sampled quarterly at the former Chevron site since July 1991. According to the quarterly ground water sampling results, very elevated concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, toluene, xylenes, and ethylbenzene (BTEX), Total Oil and Grease (TOG), 1,2-Dichloroethane (1,2-DCA), Tetrachloroethene (PCE), and Trichloroethene (TCE) have been identified from these wells. The two wells containing the highest concentrations of contaminants, STMW-1 and STMW-3, are also the two downgradient wells at this site. It appears that these contaminants may be migrating off site.

Additionally, our files indicate that there was a waste oil tank and hydraulic lifts at the former Goodyear building. Please submit any information you have on these items.

In November 1989, two tanks containing dry cleaning solvents were punctured during the demolition of the dry cleaning building. Emergency excavation was conducted. In a report dated June 8, 1990, analysis of soil samples collected from six soil borings at this site identified PCE as high as 1,100 parts per million (ppm). According to our files, the delineation and remediation of this soil contamination was never addressed. Additionally,

Mr. Mike Dosen

RE: South Shore Shopping Center

October 9, 1992

Page 2 of 3

ground water samples collected from Wells MW-7B and MW-8B have continued to exhibit high levels of Volatile Organic Compounds (VOCs) exceeding the State's MCLs, such as PCE at 8,500 parts per billion (ppb) and TCE at 700 ppb.

Lastly, during the soil excavation efforts at the former Texaco station in 1990, a soil sample collected from the southeast corner of the excavation identified 580 ppm TPHg and a soil sample collected from the west wall of the excavation identified 5,300 ppm TPHg and BTEX in excess of 100 ppm. It appears that the excavation did not occur beyond these points, so that contaminated soil was apparently left in place. Additionally, ground water collected from the site's monitoring wells have identified TPHg, BTEX, and VOCs exceeding acceptable levels. Up to 4,000 ppb TPHg and 1,200 ppb benzene have been identified from Well MW-5B, and up 2.9 ppb benzene and 6.6 ppb 1,2-DCE have been identified from MW-14.

You are required to submit a work plan within 60 days of the receipt of this letter addressing the delineation, containment, and remediation of both soil and ground water contamination observed at all three areas of the site. Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extension of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the San Francisco Bay Region-Water Quality Control Board.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Mr. Richard Hiett, RWQCB

Mr. Robert La Grone, Alameda Fire Dept.

Mr. Mike Dosen RE: South Shore Shopping Center October 9, 1992 Page 3 of 3

> Mr. Dariush Dastmalchi Clayton Environmental Consultants 1252 Quarry Lane P.O. Box 9019 Pleasanton, CA 94566

Mr. Robert Robles Texaco Refining and Marketing 10 Universal City Plaze, Ste 723 Universal City, CA 91608

Mr. Frank Hamedi Soil Tech Engineering 298 Brokaw Rd. Santa Clara, CA 95050

SITE: 2351 Shoreline Dr. Alameda

#### ALAMEDA COUNTY **HEALTH CARE SERVICES**

AGENCY DAVID J. KEARS, Agency Director



V RO 144 (South Shore)

> RO2636 (Dry Cleaners)

RAFAT A. SHAHID, Assistant Agency Director

21 January 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH 80 Swan Way, Rm. 210 Oakland, CA 94621 (415) 271-4300

Mr. Mike Dosen Vice President Harsch Investment Corporation 235 W. MacArthur Boulevard Oakland, CA 94611

Subject: Harsch property at Park and Shoreline Road, Alameda.

Dear Mr. Dosen:

This letter is in follow up to a meeting between myself and Alan Gibbs of Clayton Environmental Consultants which took place on 16 January, 1992. Mr. Gibbs provide me with a general overview of the work conducted to date and described the actions which he proposed to take regarding the further investigation of this site.

This agency concurs with the recommendation of Mr. Gibbs that a ground water pump and treat feasibility study is in order for the former dry cleaner site. Please be aware that a valid feasibility study cannot be accomplished prior to defining the extent of any contaminant plume present. Consequently, it will be necessary that at least one more ground water monitoring well be installed in conjunction with this study.

This agency also concurs with the recommendation of Mr. Gibbs that ground water monitoring wells 2,3,4 and 9B be exempted from inclusion in further quarterly sampling. These wells are to be maintained on the site and accessible for possible inclusion into the sampling protocols at some future date.

If you have any question concerning this matter, please feel free to contact me at (510) 271-4320.

Sincerely,

Dennis/J. Byrne

Senior Hazardous Materials Specialist

cc: Rich Hyatt, SFBRWQCB

Rafat Shahid, Assistant Director, Alameda County Department

of Environmental Health.

Alan Gibbs, Clayton Environmental Consultants

R02636 (SUC)

V RO144 (LOP)

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

June 26, 1991

Mr. Murray Stevens Kamur Industries 2351 Shoreline Drive Alameda, CA 94501

RE: Former South Shore Car Wash, 2351 Shoreline Drive, Alameda, CA

#### NOTICE OF VIOLATION

Dear Mr. Murray:

To date this office has not received a report that describes monitoring well installation and quarterly sampling of those wells. The original work plan, dated August 30, 1990, included a discussion of installation of three groundwater monitoring wells. It does not appear that these wells have been installed, as the February 11, 1991, progress report from Soil Tech Engineering recommends their installation. We have received no correspondence indicating what activities have occurred since this February report.

The levels of hydrocarbon contamination found during the tank removal at your facility require you to conduct a groundwater investigation to determine if groundwater has been impacted at your site. As I stated in my letter of September 12, 1990, if nearby monitoring wells are going to be used to determine gradient, then you need to provide documentation that those wells were surveyed to a known bench mark and that gradient has been established. This does not absolve you from installing wells on your site. At the absolute minimum, one upgradient well from your site would need to be installed if you choose to tie into existing wells to determine gradient.

Please provide me a status update within 10 working days of the date of this letter on what has occurred at your site since February, 1991. This status update is to include a description of where the stockpiled soils went, and an acceptable and reasonable schedule for when well installation is to be completed. This is a formal request for reports pursuant to California Water Code Section 13267 (b). Failure to respond may result in referral of this case to the San Francisco Bay Regional

Mr. Murray Stevens June 26, 1991 Page 2

Water Quality Control Board and for enforcement and you may be subject to civil liabilities imposed to a maximum amount of \$1,000 per day.

Please call me at 415/271-4320 if you have any questions.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

c: Mr. Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection

Mr. Lester Feldman, RWQCB

Mr. Michael Dosen, Harsch Development, Inc. Mr. Frank Hamedi-Fard, Soil Tech Engineering

DAVID J. KEARS, Agency Director

√R0144 (South Shore)

-> R02636 (Dry Cleaners)

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

May 29, 1991

Mr. Alan Gibbs Clayton Environmental 1252 Quarry Lane Pleasanton, CA 94566

RE: Shoreline Drive and Park Street Corner

Dear Mr. Gibbs:

The purpose of this letter is to address several items that have resulted from the recent activities at this site.

I've received your request of May 23, 1991, to monitor MW-8B on a quarterly basis. My office and the Regional Water Quality Control Board (RWQCB) requested in December 1990 that a well be installed down-gradient of existing MW-7 to determine if any solvents found in MW-7 were migrating off-site. MW-7 was installed down-gradient of the former drycleaning facility.

MW-7 was last sampled in November 1990 for purgeable halocarbons. Those found were: Tetrachloroethene at 1,900 $\mu$ /L, trichloroethene at 520 $\mu$ /L, 1,2-dichloroethene at 440 $\mu$ /L. Maximum contaminant levels (MCL) and DHS action levels for these chemicals are 5 $\mu$ /L, 5 $\mu$ /L, 10 $\mu$ /L, and 6 $\mu$ /L, respectively. The sampling and analyses table for the April 1991 quarterly monitoring event indicates a slight decrease in these levels: 1,600 $\mu$ /L, 200 $\mu$ /L, 90 $\mu$ /L, and 90 $\mu$ /L respectively. MW-8B was installed and sampled in April 1991. Water analyses show 1,2-dichloroethene at 6.8 $\mu$ /L, trichloroethene at 7.7 $\mu$ /L, and tetrachloroethene at 1.1 $\mu$ /L. MW-14 was also installed in April, 1991 in the intersection of Shoreline Drive and Park Street. Tetrachloroethene was found at 16 $\mu$ /L, trichloroethene at 0.4 $\mu$ /L and 1,2-dichloroethane at 4.6 $\mu$ /L (MCL is 0.5 $\mu$ /L). Groundwater gradient direction was not provided with the April 1991 sampling results table.

Quarterly monitoring of MW-8B is acceptable, based on the information I have. Because of the lack of information that I have, I am requesting that a report be submitted to my office that describes the field activities that have occurred since December of last year. This is to include well installation logs, sampling analyses, determination of gradient, as well as a description of the tasks performed to date (Tasks 1 through 8 according to the February 28, 1991, work plan).

Shoreline and Park Street May 29, 1991 Page 2

This work plan indicates that a pump test will be conducted in June, and a feasibility study is due in August that provides groundwater remediation alternatives that are based on the results of the pump test. The next round of quarterly sampling is to be done in July. If the schedule of the pump test and feasibility study is not going to be adhered to, Harsch Development is submit a proposal to my office within 45 days of the date of this letter, that describes what interim remedial measures are going to be taken to prevent any additional solvent plume migration from MW-7. The quarterly sampling event is still required to be on schedule.

In addition, the deposit/refund account for oversight of this project is currently in a negative balance. To continue the county's oversight of this project, Harsch Development, as property owner, is to remit \$1,370.00, payable to Alameda County. Our authority to recover costs spent on project oversight is granted by County Ordinance 71-52.

If you have any questions, feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

"ignthia Chapman

Mr. Michael Dosen, Harsch Development

Ms. Rose Coughlin, Texaco Refining and Marketing, Inc.

Mr. Lester Feldman, Regional Water Quality Control Board

Ms. Judith Altschuler, City of Alameda Mr. Roy Ikeda, Crosby, Heafey, Roach and May

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

V R0144 (South Shore)

-> R02636 (Dry Cleaners)

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

May 17, 1991

Mr. Alan Gibbs Clayton Environmental Consultants 1252 Quarry Lane Pleasanton, CA 94566

RE: Approval for the Shoreline Drive and Park Street Groundwater Remedial Investigation

Dear Mr. Gibbs:

This letter is in response to your request for written approval by our office of the "Work Plan for Groundwater Remedial Investigation at Shore Line Drive and Park Street," dated February 28, 1991, prepared by Clayton Environmental. This work plan has outlined the steps that will be taken by Clayton on behalf of Harsch Investment Corporation to investigate the extent of groundwater contamination at the site, and determine the feasible remedial alternatives to address and remediate groundwater contamination.

I have already given verbal approval to implement this work plan, and the outlined tasks appear to be proceeding on course. Since a work plan only represents the information known about the site at the time the work plan is prepared, it remains incumbent upon the responsible party to continue to protect the waters of the state, and to keep the oversight agency informed of any change to that approved work plan. With this in mind, I have been assured that construction of the Lyon's Restaurant will not adversely impact nor interfere with any proposed groundwater remediation that is expected to occur at this site. Ms. Laurene Compton of your office has been most diligent about informing me of any subsequent changes to the work plan, which have included the relocation of wells MW-1, MW-9, and MW-5, (which is to be used as the extraction well), as well as seeking approval from this office to pave over the site. Currently, Texaco has excavated much of the soil and backfilled with clean fill, thus reducing any levels of contamination that may adversely impact groundwater.

Shoreline and Park Street May 17, 1991 Page 2

You can consider this letter formal approval for the February 28, 1991 work plan. If you have any questions, do not hesitate to call me at 415/271-4320. And as always, please continue to keep me informed in a timely manner of activities that are to occur at the site.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

c: Mr. Joe Munyer

Ms. Rose Coughlin

Cynthia Chapman

Mr. Roy Ikeda

lyonsres.wpa

DAVID J. KEARS, Agency Director

September 12, 1990

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

Mr. Murray Stevens Kamur Industries, Inc. 2351 Shoreline Drive Alameda, CA 94501

Dear Mr. Stevens:

The Alameda County Division of Hazardous Materials has reviewed the work plan proposal submitted by Soil Tech Engineering dated August 30, 1990. The Division accepts the work plan with the following additions:

- The first paragraph on page 6 discusses using an OVA for screening purposes on excavated soils. Please note that field sampling does need to be verified by laboratory analyses.
- If stockpiled soils exceed the 1,000 ppm TPH level, you will need to determine if the soil meets the classification criteria for a hazardous waste as described in California Code of Regulations Title 22, Article 11. If the soil meets the definition of a hazardous waste, any request for storage greater than 90 days would need a variance from the State Department of Health Services.
- If other groundwater monitoring wells located near the site are going to be used to determine gradient, the report will need to include documentation that those wells were surveyed to a known bench mark and that gradient has been established. Rationale for placement of wells to be installed should also be included in the report.
- As stated in the 10 August 1990 Tri-Regional Recommendations, all work and reports which require geologic or engineering evaluations and judgments must be performed under the direction of an appropriately registered or certified professional. The report discussing the results of soil boring and monitoring well installation will require a registered geologist/engineer stamp and a statement describing the qualifications for each lead professional.

We request that a monthly status report be sent that describes activities that have occurred at the site, to keep us informed of the events.

Copies of all investigation reports should also be sent to the Regional Water Quality Control Board, 1800 Harrison Street,

Shoreline Car Wash September 12, 1990 Page 2

Suite 700, Oakland, 94612.

If you have any questions, please call the undersigned at 415/271-4320.

Sincerely,

Cynthia Chapman Hazardous Materials Specialist

cc: Steven LuQuire, RWQCB
Richard Downs, Soil Tech Engineering
Joseph Munyer, Harsch Investment