

20148

Drogos, Donna, Env. Health

From: Drogos, Donna, Env. Health
Sent: Monday, July 30, 2007 2:17 PM
To: 'Goloubow, Ron'
Cc: Pardini, Chuck; Isabelle Mathieu; Plunkett, Steven, Env. Health
Subject: RE: Fuel Leak Case Number RO0000148, Former Cox Cadillac Site, 230 Bay Place, Oakland, California

Hi Ron,

I am aware of the issues at this site. When you & Chuck & I spoke in detail about this site on June 1, I indicated that we would do our best to accommodate your schedule provided that you posted the reports to our ftp site as soon as possible, giving me as much lead time to get the case assigned & those reports reviewed. On June 1st you indicated you had a draft report, but to date we have not received the report as an ftp upload. (Our electronic case files indicate only one report has been submitted in 2007, dated 01/26/07.)

I understand that time is of the essence for you, however 8 weeks have passed since you alerted me to the site and you are getting very near to the time you would have liked a regulatory response; leaving little time for regulatory review. As previously requested, please post your reports to ACEH's ftp site for processing & e-mail me when they are posted. We currently have many projects that need to be reviewed. If you anticipate a regulatory response within the next 30 days to meet the schedule we previously discussed, you will need to submit those reports immediately.

Donna

Donna L. Drogos, PE
 LOP Program Manager
 Alameda County Environmental Health
 1131 Harbor Bay Parkway
 Alameda, CA 94502

510-567-6721
 donna.drogos@acgov.org

From: Goloubow, Ron [mailto:Ron.Goloubow@lfr.com]
Sent: Monday, July 30, 2007 1:26 PM
To: Drogos, Donna, Env. Health; Plunkett, Steven, Env. Health
Cc: Pardini, Chuck; Goloubow, Ron; Isabelle Mathieu
Subject: Fuel Leak Case Number RO0000148, Former Cox Cadillac Site, 230 Bay Place, Oakland, California

Donna - During the course of speaking to Steve Plunkett regarding closure at a couple of "legendary" underground storage tank sites in Emeryville (East Bay Bridge), I asked if he knew about the status of the subject site. I explained to Steve that Don Hwang was the former Alameda County Department of Environmental Health (County) case officer for this project, and that we were looking forward to establishing a relationship with the new County representative on the project as soon as possible. You will recall that we discussed this with you when we spoke last month. Though we had attempted to keep Don informed of the status of the project during the period of significant field activities, we did not get much reaction from him when reporting the status of the project. Therefore, we are unsure how much information the County has and the time it will take to get the new case officer up-to-speed. We will do what we need to to establish an effective and efficient relationship with this person so that we can continue the remedial progress made at the site.

In any event, I went over the project with Steve and explained that four of five on-site groundwater monitoring wells were abandoned to accommodate the demolition, construction, and redevelopment of the site. Also,

7/30/2007

approximately 5,000 tons of TPH-affected soil has been removed from the site, and approximately 245,000 gallons of water have been removed from the excavated area. This information along with analytical results of the confirmation soil samples and the proposed locations of four replacement groundwater monitoring wells are summarized in a draft report that will be sent to the county before the end of this week. It is our understanding that an County case worker has not been assigned to this case. At this time we would like to know if it is appropriate to send the document to Steve for his review.

In addition, time is of the essence for this project. The site has been redeveloped into a Whole Foods Grocery Store that is set to open by September 26, 2007. Prior to the store opening (in fact prior to September 10, 2007), the replacement groundwater monitoring wells need to be installed. As I discussed with Steve, there are not many (if any) options for locating the wells as the newly constructed building takes up the majority of the property.

However, there are several potential locations for the replacement wells that will provide the data necessary to assess groundwater quality at this site. I have attached two figures to this email - one is a groundwater elevation contour map from January 2004 that illustrates the groundwater flow direction at the Site, and the other map illustrates the location of the excavation, the recently constructed grocery store, and the proposed groundwater monitoring well locations.

If you could please let us know if we can send the document to Steve for his review that would be great. In addition, if you (and or Steve) could review the attached maps to assess if the proposed well locations are appropriate, that would be very much appreciated also.

Thanks in advance and we look forward to continue working with the County on this project.

Ron.

Ron Goloubow
Senior Associate Geologist
LFR Inc.
1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827
510-596-9550 Direct Dial
510-501-1789 Cell
510-652-4500 Main Number
510-652-4906 Facsimile
ron.goloubow@lfr.com
Visit us at www.lfr.com

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7/30/2007

December 9, 2004

001-09171-10

Mr. David F. Charter
State Water Resources Control Board
Division of Clean Water Programs
1001 I Street
Sacramento, CA 94244

Alameda County
DEC 13 2004
Environmental Health

Subject: Request for Pre-Approval for the Former Cox Cadillac Property, 230 Bay Place, Oakland, California (Fuel Leak Case No. RO0000148; UST Fund Claim No. 011577)

Dear Mr. Charter:

On behalf of Bond Companies, LFR Levine-Fricke (LFR) has prepared this letter to request pre-approval from the Underground Storage Tank (UST) Fund for costs to implement the soil and groundwater investigation activities at the Former Cox Cadillac Property, 230 Bay Place, Oakland, California ("the Site"). The soil and groundwater investigation activities are being conducted pursuant to requests from the Alameda County Environmental Health Services (ACEHS) Local Oversight Program.

Details regarding the scope of work to be conducted at the Site is presented in the attached document: "Work Plan to Conduct Additional Soil and Grab Groundwater Sampling at the Former Cox Cadillac Property, 230 Bay Place, Oakland, California dated October 28, 2004" (the "Work Plan"). The estimated cost to implement the scope of work presented in the Work Plan are provided in the "Work Order to Conduct Additional Soil and Grab Groundwater at the Former Cox Cadillac Property, 230 Bay Place, Oakland, California dated October 27, 2004". The scope of work presented in the Work Plan was approved by the ACEHS in their letter to the Bond Companies dated November 30, 2004 that is also attached.

In order to meet the schedule requirements of the ACEHS, LFR and the Bond Companies are planning to implement the Work Plan during the first two weeks of January 2004. LFR and the Bond Companies would greatly appreciate having your pre-approval of the scope of work and costs to implement the Work Plan prior to that time.

I will contact you during the week of December 27, 2004 to follow up and respond to any of your questions or comments regarding the attached documents. If you have any questions or comments regarding the scope of work or the project in general, please contact me or Chuck Pardini at (510) 652-4500.

Sincerely,

A handwritten signature in black ink that reads "Kimberly A. Brandt". The signature is written in a cursive style with a large, looped 'K' and 'B'.

Kimberly A. Brandt, R.G., C.H.G.
Senior Associate Hydrogeologist

cc: Mr. Robert Bond, Bond Companies (without enclosures)
Zachary Walton, Esq., Paul, Hastings, Janofsky & Walker LLP (without enclosures)
Mr. Don Hwang, Alameda County Environmental Health Services (without enclosures)

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

November 30, 2004

Bond CC Oakland, LLC
c/o 350 W. Hubbard Street, Suite 450
Chicago, Illinois 60610
Attention: Mr. Robert Bond

Kestrel Partners, LLC
c/o 4457 Willow Road, Suite 102
Pleasanton, California 94588
Attention: Mr. Arnold E. Brown

230 Bay Place, LP.
c/o 400 Race Street, Suite 200
San Jose, CA 95126
Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP
333 Market Street, Suite 2300
San Francisco, California 94105
Attention: Rory Campbell, Esq.
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard
Trust, and the Lisa C. Shepard Trust

Dear Messrs. Bond, Brown, Wilson, & Campbell:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland,
CA

Alameda County Environmental Health (ACEH) staff reviewed "Work Plan to Conduct Additional Soil and Grab Groundwater Sampling" dated October 28, 2004, and "Request that Alameda County Health Care Services Agency Require the Greater Bay Trust Company to Conduct Periodic Groundwater Monitoring Activities" dated November 10, 2004, both prepared by LFR Levine-Fricke (LFR). We generally concur with the work plan which proposes to install borings near the former underground storage tanks and the underground utilities. We request that you address the following comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Soil samples from borings - Sample at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination. Please include in the Soil and Water Investigation Report.
- 2) Monitoring well screens - The proposed temporary monitoring wells indicate screened intervals of 10 feet in length. We request that your monitoring network be depth discrete, generally, screened intervals of 3 to 5 feet in length.
- 3) Additional soil or groundwater sampling in the utility corridor(s) - If the analytical results for soil and/or groundwater samples collected from either borings A or B are greater than the cleanup criteria for petroleum hydrocarbons and associated compounds, then additional borings will be required to further delineate the soil and/or groundwater contamination. Please include in the Soil and Water Investigation Report.
- 4) Geologic Cross-Sections - Please include and show soil and groundwater analytical results, utility conduits, well screens, etc. in revision of LFR report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004. Please include in the Soil and Water Investigation Report.

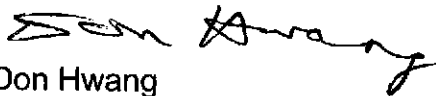
TECHNICAL REPORT REQUEST

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

- December 1, 2004 - 2nd Quarter 2004 Groundwater Monitoring Report, 3rd Quarter 2004 Groundwater Monitoring Report, Interim Remediation Completion Report
- January 31, 2005 - Soil and Water Investigation Report, 4th Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 - 2nd Quarter 2005 Groundwater Monitoring Report

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

Sincerely,



Don Hwang

Hazardous Materials Specialist
Local Oversight Program

C: Charles Pardini, Kimberly Brandt, Levine-Fricke, 1900 Powell St., 12th Floor,
Emeryville, CA 94608-1827
Donna Drogos
File



1900 Powell Street, 12th Floor
Emeryville, California 94608-1827
(510) 652-4500, FAX (510) 652-4906

FAX TRANSMISSION: This cover page plus 2 pages.

Date	November 10, 2004
Time	6:21PM
From	vch for Kimberly Brandt

Deliver To	Mr. Don Hwang		
Name of Firm	Alameda County Environmental Health Services		
FAX Number	(510) 337-9335	Project No.	001-09171-11

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Comments:

"Request that Alameda County Health Care Services Agency Require the Greater Bay Trust Company to Conduct Periodic Groundwater Monitoring Activities at the Former Cox Cadillac Property, 230 Bay Place, Oakland, California"

Alameda County
NOV 12 2004
Environmental Health

November 10, 2004

001-09171-11

Mr. Don Hwang
Hazardous Materials Specialist
Local Oversight Program
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Alameda County
NOV 16 2004
Environmental Health

Subject: Request that Alameda County Health Care Services Agency Require the Greater Bay Trust Company to Conduct Periodic Groundwater Monitoring Activities at the Former Cox Cadillac Property, 230 Bay Place, Oakland, California

Dear Mr. Hwang:

On behalf of Bond CC Oakland, LLC ("Bond"), LFR Levine-Fricke (LFR) is requesting that the Alameda County Health Care Services Agency (ACHCSA) require the Greater Bay Trust Company (GBTC) to conduct periodic groundwater monitoring activities at the Former Cox Cadillac Property located at 230 Bay Place in Oakland, California ("the Site").

Alameda County Environmental Health staff have requested in letters dated August 31, 2004, September 21, 2004, and October 6, 2004, that quarterly groundwater monitoring reports be prepared and submitted to the ACHCSA. None of the three letters specify which of the various addressees is required to conduct this task.

LFR has responded on behalf of Bond in letters dated September 15, 2004 and October 1, 2004, that groundwater monitoring and reporting activities are the responsibility of the GBTC, and that representatives of Bond have contacted representatives of the GBTC regarding this issue.

LFR requests, on behalf of Bond, that the ACHCSA send a letter to the GBTC requiring them to conduct groundwater monitoring activities until such time that the periodic groundwater monitoring responsibility is transferred to Bond.

We appreciate your attention to this matter. If you have any questions or comments, please call either of the undersigned at (510) 652-4500.

Sincerely,

A handwritten signature in cursive script that reads "Charles H. Pardini".

Charles H. Pardini, R.G.
Principal Geologist
Assistant Operations Manager

A handwritten signature in cursive script that reads "Kimberly A. Brandt".

Kimberly A. Brandt, R.G., C.H.G.
Senior Associate Hydrogeologist

Enclosure

cc: Mr. Robert Bond, Bond CC Oakland, LLC
Zachary Walton, Esq., Paul, Hastings, Janofsky & Walker LLP

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 6, 2004

Bond CC Oakland, LLC
c/o 350 W. Hubbard Street, Suite 450
Chicago, Illinois 60610
Attention: Mr. Robert Bond

Kestrel Partners, LLC
c/o 4457 Willow Road, Suite 102
Pleasanton, California 94588
Attention: Mr. Arnold E. Brown

230 Bay Place, LP.
c/o 400 Race Street, Suite 200
San Jose, CA 95126
Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP
333 Market Street, Suite 2300
San Francisco, California 94105
Attention: Rory Campbell, Esq.
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard
Trust, and the Lisa C. Shepard Trust

Dear Messrs. Bond, Brown, Wilson, & Campbell:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland,
CA

Alameda County Environmental Health (ACEH) staff reviewed "Response to Alameda County Health Care Services Agency Comments to LFR Letter dated September 15, 2004," dated October 1, 2004, prepared by LFR Levine-Fricke (LFR). Soil and Groundwater Cleanup Levels and Cleanup Goals for the additional chemicals of concern have been provided and are acceptable. Thus, your proposed interim remediation work plan is approved. We request that you address the following comments, perform the proposed interim remediation work, and send us the technical reports requested below.

OTHER COMMENTS

1) Interim Remediation Completion Report submittal due date – Instead of proposing an alternative to the deadline date of December 1, 2004, LFR suggests establishing a submittal date after remedial activities have commenced. Until a different deadline is established, we will consider the existing date of December 1, 2004 as the deadline date.

2) Notification prior to start of field work – 48 hrs.

TECHNICAL REPORT REQUEST

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

- October 31, 2004 – 2nd Quarter 2004 Groundwater Monitoring Report
- October 31, 2004 - 3rd Quarter 2004 Groundwater Monitoring Report
- December 1, 2004 – Interim Remediation Completion Report
- January 31, 2005 - 4th Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 – 2nd Quarter 2005 Groundwater Monitoring Report

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

Sincerely,



Don Hwang

Hazardous Materials Specialist
Local Oversight Program

C: Charles Pardini, Kimberly Brandt, Levine-Fricke, 1900 Powell St., 12th Floor,
Emeryville, CA 94608-1827
Donna Drogos
File

October 4, 2004

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

Alameda County
OCT 08 2004
Environmental Health Services

Re: Response to ACHCSA September 21, 2004 Comments - Former Cox Cadillac Site

The following item are Enclosed via U.S. Mail

Description	No. of Copies
Response to September 21, 2004 Comment Letter	1

- The item(s) are transmitted:
- | | |
|---|--|
| <input type="checkbox"/> At your request | <input type="checkbox"/> For your action |
| <input type="checkbox"/> For your review/comment | <input checked="" type="checkbox"/> For your files |
| <input checked="" type="checkbox"/> For your approval | <input type="checkbox"/> For your information |

Comments:

Don,

Enclosed is the original of the letter I faxed to you on Friday, October 1, 2004. The letter includes the perjury statement by Bond CC Oakland, LLC and the certification page. As I indicated on my fax cover sheet for this document, I will phone you this week concerning the next steps on this project, including submittal of the work plan and the revised investigation report. If you need anything else, please call me at (510) 596-9536.

Chuck





1900 Powell Street, 12th Floor
Emeryville, California 94608-1827
(510) 652-4500, FAX (510) 652-4906

FAX TRANSMISSION: This cover page plus 6 pages.

Date	October 1, 2004		
Time	2:52PM		
From	Chuck Pardini <i>Chuck Pardini</i>		

Deliver To	Don Hwang		
Name of Firm	Alameda County Environmental Health Department		
FAX Number	(510) 337-9335	Project No.	

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Comments:

Don,

Enclosed is the Addendum (Interim Remediation) requested in your September 21, 2004 letter. As we discussed on Wednesday, it includes a response to all of the comments in your September 21, 2004 letter. Also, the letter includes the required perjury statement from Bond CC, as well as our certification.

The hard copy of this submittal will follow as soon as we receive the hard copy of the letter from Mr. Bond. I will phone you next week concerning the next steps on this project, including submittal of the work plan and the revised investigation report.

If you have any questions, please call me at (510) 596-9536.

Chuck

Alameda County
OCT 01 2004
Environmental Health

Bond CC Oakland, LLC
350 W. Hubbard Street
Suite 450
Chicago, Illinois 60610
(312) 853-0070
(312) 670-0408 facsimile

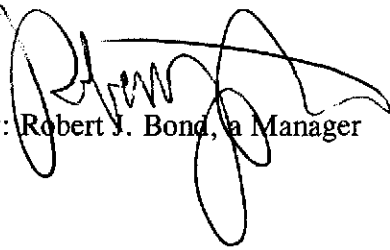
October 1, 2004

I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge.

By: Bond Capital Investors, LLC, its Member

By: Bond Investment Company, LLC, its Manager

By: Robert J. Bond, a Manager

A handwritten signature in black ink, appearing to read "Robert J. Bond", is written over the printed name. The signature is stylized with large loops and a long horizontal stroke.

October 1, 2004

001-09171-04

Mr. Don Hwang
Hazardous Materials Specialist
Local Oversight Program
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Alameda County
OCT 03 2004
Environmental Health

Subject: Response to Alameda County Health Care Services Agency Comments to LFR Letter dated September 21, 2004, for Cox Cadillac, 230 Bay Place, Oakland, California Fuel Leak Case No. RO0000148

Dear Mr. Hwang:

Alameda County Environmental Health (ACEH) staff recently reviewed the document entitled "Response to Alameda County Health Care Services Agency Comments to Revised Corrective Action Plan, dated June 25, 2004, for Cox Cadillac, 230 Bay Place, Oakland, California Fuel Leak Case No. RO0000148, dated September 15, 2004 and prepared by LFR Levine-Fricke (LFR). In a letter dated September 21, 2004, from the Alameda County Health Care Services Agency (ACHCSA) to Bond CC Oakland LLC ("Bond"), Kestrel Partners, LLC, 230 Bay Place, LP, and the Greater Bay Trust Company, ACEH requested a response to two technical comments, provided three Other Comments, and made Technical Report Requests. This letter serves as a second addendum to the "Revised Corrective Action Plan (RCAP)," dated June 25, 2004 and prepared by LFR, and a response to the ACHCSA's September 21, 2004 letter.

TECHNICAL COMMENTS

1. Excavation Cleanup Levels and Cleanup Goals. The ACEH staff concurred with the implementation of the excavation activities proposed in the RCAP as an interim remedial action. However, the ACEH staff has requested that the soil and groundwater cleanup levels and cleanup goals be modified to be consistent with the San Francisco Regional Water Quality Control Board (RWQCB) Basin Plan and appropriate Environmental Screening Level (ESL) guidance for the chemicals of concern and for the appropriate groundwater designation.

To address the ACEH's request, LFR modified the soil and groundwater cleanup goals to represent levels that are protective of groundwater as a drinking water source for a property that is to be developed for a commercial use. Proposed soil and groundwater cleanup goals for six additional constituents are presented in this letter. The additional constituents are the following: ethane dichloride, (EDC - also referred to as 1,2 dichloroethane); methyl tertiary-butyl ether (MTBE); tert amyl methyl ether (TAME); ethyl tertiary butyl ether (ETBE); di-isopropyl ether

(DIPE); and tertiary butyl alcohol (TBA). The soil and groundwater cleanup goals for EDC, MTBE, and TBA at the former Cox Cadillac property are based on the RWQCB's ESLs (February 2004). Cleanup goals for the compounds TAME, ETBE, and DIPE were not available in the references, including ESLs, Preliminary Remedial Goals, and Maximum Contaminant Levels. Therefore, we are proposing to use the cleanup goals for MTBE as a surrogate for these three compounds. The rationale for proposing the MTBE cleanup levels for these three compounds are that MTBE and the three compounds are ethers with similar chemical properties, and that the proposed cleanup goals for MTBE are very conservative.

Soil and Groundwater Cleanup Levels and Cleanup Goals

Chemicals of Potential Concern	Soil Cleanup Level and Cleanup Goal (mg/kg)	Groundwater Cleanup Level and Cleanup Goal ($\mu\text{g/l}$)
ethane dichloride (EDC; 1,2-dichloroethane)	0.0045	0.5
methyl tertiary-butyl ether (MTBE)	0.023	5.0
tertiary amyl methyl ether (TAME)	0.023 *	5.0 *
ethyl tertiary butyl ether (ETBE)	0.023 *	5.0 *
di-isopropyl ether (DIPE)	0.023 *	5.0 *
tertiary butyl alcohol (TBA)	0.073	12.0

Notes: mg/kg = milligrams per kilogram; $\mu\text{g/l}$ = micrograms per liter; TPH = total petroleum hydrocarbons

* - cleanup goal based on MTBE cleanup goal

2. Geologic Cross Sections. ACEH staff requested that soil and groundwater analytical results, utility conduits, well screens, etc. be included in a revision of the report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004, Cross sections with the requested information will be included in the revised report.

OTHER COMMENTS

3. Interim Remediation Completion report submittal due date. LFR has requested that the date be changed to 60 days following completion of the Interim Remediation activities. ACEH has requested justification for an extension of the December 1, 2004 deadline. Rather than suggest an alternative submittal date for this report prior to remedial activities beginning, LFR suggests

establishing a submittal date after remedial activities commence, so that a realistic submittal date can be agreed upon by all parties.

4. Professional Certification. All work plans and technical or implementation reports containing geologic or engineering evaluation and/or judgements will continue to be prepared by, or performed under, the direct supervision of an appropriately registered or certified professional. Future documents will include a certification page containing a statement reflecting the above information. The report will include a professional registration stamp, expiration date, and signature.

5. Perjury Statement. All future work plans and technical reports submitted to the ACHSA will be accompanied by a signed cover letter from the responsible party for the Site that will state, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge."

TECHNICAL REPORT REQUEST

The ACEH staff requested submittal of this addendum, quarterly groundwater monitoring reports, and an interim remediation completion report. This letter serves as the addendum.

Regarding groundwater monitoring for the Site, it is currently the responsibility of the Greater Bay Trust Company to conduct groundwater monitoring for the Site. Bond will contact the Greater Bay Trust Company to assess status of groundwater monitoring activities for the Site. Bond will provide Mr. Hwang with any updated information as it is obtained. Bond anticipates that it will be able to conduct future groundwater monitoring events on behalf of the Greater Bay Trust Company.

ACEH staff has requested that an Interim Remediation Completion report be submitted by December 1, 2004. As stated above, LFR requests that rather than suggesting an alternative submittal date for this report prior to remedial activities beginning, a submittal date be established after remedial activities commence, so that a realistic submittal date can be agreed upon by all parties.

In addition, LFR is still revising its report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004, based on Mr. Hwang's verbal comments received during the September 8, 2004 telephone conversation. This revised report will include additional recommendations to assess the vertical extent of soil and groundwater contamination in the vicinity of the former gasoline underground storage tank (UST) and an investigation in the backfill in the utility corridor nearest the Site, in addition to the vertical extent investigation proposed in the vicinity of the former waste oil UST.

Bond and LFR request that the ACHCSA review and approve this addendum to the June 25, 2004 RCAP, and the September 15, 2004 addendum letter. Upon receipt of your approval of the interim

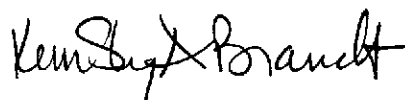
remedial activities, we will commence securing subcontractors and initiate beginning the interim remedial work.

If you have any questions or comments, please contact the undersigned at (510) 652-4500.

Sincerely,

A handwritten signature in cursive script that reads "Charles H. Pardini".

Charles H. Pardini, R.G.
Principal Geologist
Assistant Operations Manager

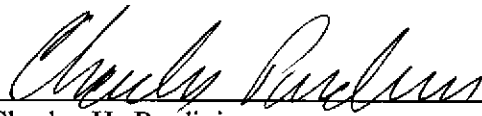
A handwritten signature in cursive script that reads "Kimberly A. Brandt".

Kimberly A. Brandt, R.G., C.HG.
Senior Associate Hydrogeologist

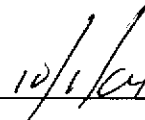
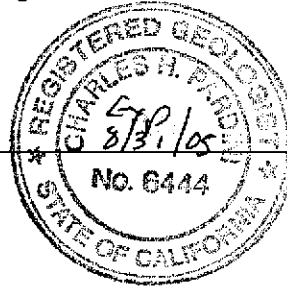
cc: Robert Bond, Bond CC Oakland LLC

CERTIFICATION

All hydrogeologic and geologic information, conclusions, and recommendations in this document have been prepared under the supervision of and reviewed by an LFR Levine-Fricke California Registered Geologist.



Charles H. Pardini
Principal Geologist
California Registered Geologist (6444)



Date

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



LOP

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

September 21, 2004

Bond CC Oakland, LLC
c/o 350 W. Hubbard Street, Suite 450
Chicago, Illinois 60610
Attention: Mr. Robert Bond

Kestrel Partners, LLC
c/o 4457 Willow Road, Suite 102
Pleasanton, California 94588
Attention: Mr. Arnold E. Brown

230 Bay Place, LP.
c/o 400 Race Street, Suite 200
San Jose, CA 95126
Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP
333 Market Street, Suite 2300
San Francisco, California 94105
Attention: Rory Campbell, Esq.
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard
Trust, and the Lisa C. Shepard Trust

Dear Messrs. Bond, Brown, Wilson, & Campbell:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland,
CA

Alameda County Environmental Health (ACEH) staff reviewed "Response to Alameda County Health Care Services Agency Comments to Revised Corrective Action Plan", dated September 15, 2004, prepared by LFR Levine-Fricke (LFR), to determine if the information requested for the remediation proposal of excavating contaminated soil as interim remediation was satisfied. We request that you address the following technical comments, perform the proposed interim remediation work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Excavation Cleanup Levels and Cleanup Goals. The Revised Soil and Groundwater Cleanup levels and Cleanup Goals for the chemicals of concern provided are

acceptable. However, the list of the chemicals of concern is incomplete. Omitted were: EDC, MTBE, TAME, ETBE, DIPE, and TBA. Please submit appropriate cleanup levels; and cleanup goals for these chemicals of concern.

2) Geologic Cross-Sections - Please include and show soil and groundwater analytical results, utility conduits, well screens, etc. in revision of LFR report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004.

OTHER COMMENTS

3) Interim Remediation Completion report submittal due date - ACEH staff has requested that an Interim Remediation Completion report be submitted by December 1, 2004. LFR requests that this date be changed to "60 days following completion of the Interim Remediation activities," as described in the RCAP. ACEH would like justification for an extension of the deadline and an alternative date.

4) Professional Certification - 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.

5) Perjury Statement - Please note, all work plans and technical reports submitted to this office 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 proposal 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. A review of our case file indicates that none of your reports contain a perjury statement. We request that perjury statements be submitted with all future reports for this site.

TECHNICAL REPORT REQUEST

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

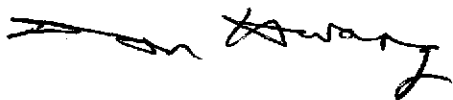
- October 1, 2004 – Addendum (Interim Remediation)
- October 1, 2004 – 2nd Quarter 2004 Groundwater Monitoring Report

Messrs. Bond, Brown, Wilson, & Campbell
September 21, 2004
Page 3 of 3

- October 31, 2004 - 3rd Quarter 2004 Groundwater Monitoring Report
- December 1, 2004 – Interim Remediation Completion Report
- January 31, 2005 - 4th Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 – 2nd Quarter 2005 Groundwater Monitoring Report

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

Sincerely,



Don Hwang

Hazardous Materials Specialist
Local Oversight Program

C: Charles Pardini, Kimberly Brandt, Levine-Fricke, 1900 Powell St., 12th Floor,
Emeryville, CA 94608-1827
Donna Drogos
File



1900 Powell Street, 12th Floor
Emeryville, California 94608-1827
(510) 652-4500, FAX (510) 652-4906

FAX TRANSMISSION: This cover page plus 5 pages.

Date	September 15, 2004
Time	4:13PM
From	DEH for Charles Pardini and Kimberly Brandt

Deliver To	Mr. Don Hwang		
Name of Firm	AE HCSA		
FAX Number	510-337-9335	Project No.	001-09171-04

THE INFORMATION CONTAINED IN THIS FACSIMILE IS CONFIDENTIAL AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE PERSON RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, DO NOT USE OR DISCLOSE THIS FACSIMILE. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TO LFR LEVINE-FRICKE VIA THE U.S. POSTAL SERVICE. THANK YOU.

Comments: Attached is a facsimile of LFR's "Response to Alameda County Health Care Services Agency Comments to Revised Corrective Action Plan, dated June 25, 2004, for Cox Cadillac, 230 Bay Place, Oakland, California Fuel Leak Case No. RO0000148." The original letter will be sent to you today via regular mail.

Thank you.

Alameda County
SEP 15 2004
ELECTRONIC MAIL



September 15, 2004

Mr. Don Hwang
Hazardous Materials Specialist
Local Oversight Program
Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Certified List of Record Fee Title Owners for Cox Cadillac, 230 Bay Place, Oakland, California
Fuel Leak Case No. RO0000148

Dear Mr. Hwang:

In accordance with accordance with Section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, Robert Bond of Bond Companies, certify that the following is a complete list of current record fee title owners and their mailing addresses, contacts, and phone numbers for the above site:

Bond CC Oakland, LLC
c/o 350 West Hubbard Street, Suite 450
Chicago, IL 60610
Attention: Mr. Robert Bond

Kestrel Partners, LLC
c/o 4457 Willow Road, Suite 102
Pleasanton, California 94588
Attention: Mr. Arnold E. Brown

230 Bay Place, L.P.
c/o 400 Race Street, Suite 200
San Jose, CA 95126
Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP
333 Market Street, Suite 2300
San Francisco, California 94105
Attention: Rory Campbell, Esq.
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard Trust, and the Lisa C. Shepard Trust

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Bond', is written over a large, stylized, circular scribble.

Robert Bond
President
Bond Companies



350 West Hubbard Street, Suite 450
 Chicago, IL 60610
 Tel: 312/853-0070 Fax: 312/670-0408
 Email: Roband@bondcompanies.com

SEP 17 2004
 Environmental Health

facsimile

To: ACHCSA	From: Rob Bond
Fax: (510) 337-9335	Pages: 2
Phone:	Date: 9/17/2004
Re: List of Record Fee Title Owners	CC:

Urgent
 For Review
 Please Comment
 Please Reply
 Please Recycle

● Comments:

September 15, 2004

001-09171-04

Mr. Don Hwang
Hazardous Materials Specialist
Local Oversight Program
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Response to Alameda County Health Care Services Agency Comments to Revised Corrective Action Plan, dated June 25, 2004, for Cox Cadillac, 230 Bay Place, Oakland, California Fuel Leak Case No. RO0000148

Dear Mr. Hwang:

Alameda County Environmental Health (ACEH) staff recently reviewed the document entitled "Revised Corrective Action Plan" (RCAP), dated June 25, 2004 and prepared by LFR Levine-Fricke (LFR). In a letter dated August 31, 2004, from the Alameda County Health Care Services Agency (ACHCSA) to Bond CC Oakland LLC ("Bond"), Bill Cox Cadillac & Buick, and the Greater Bay Trust Company, ACEH requested a response to two technical comments, submittal of additional reports, and compliance with AB681 (Machado) Chapter 255, Statutes of 1998 requirements. This letter serves as an addendum and a response to the ACHCSA's August 31, 2004 letter.

TECHNICAL COMMENTS

1. Excavation Cleanup Levels and Cleanup Goals. The ACEH staff concurs with the implementation of the excavation activities proposed in the RCAP as an interim remedial action. However, the ACEH staff has requested that the soil and groundwater cleanup levels and cleanup goals be modified to be consistent with the San Francisco Regional Water Quality Control Board (RWQCB) Basin Plan and appropriate Environmental Screening Level (ESL) guidance for all chemicals of concern and for the appropriate groundwater designation.

To address the ACEH's request, LFR has modified the soil and groundwater cleanup goals to represent levels that are protective of groundwater as a drinking water source for a property that is to be developed for a commercial use. The proposed soil and groundwater cleanup levels and cleanup goals for the former Cox Cadillac property are presented below and are based on the RWQCB's ESLs (July 2004). These soil and groundwater cleanup levels and cleanup goals will supersede the soil and groundwater cleanup goals presented in the RCAP.

Revised Soil and Groundwater Cleanup Levels and Cleanup Goals

Chemicals of Potential Concern	Soil Cleanup Level and Cleanup Goal (mg/kg)	Groundwater Cleanup Level and Cleanup Goal ($\mu\text{g/l}$)
TPH as gasoline	100	100
TPH as diesel	100	100
benzene	0.044	1.0
toluene	2.9	40
ethylbenzene	3.3	30
xylene	1.5	13
methyl tertiary-butyl ether (MTBE)	0.023	5.0
ethylene dibromide (EDB)	0.00033	0.05

Notes: mg/kg = milligrams per kilogram; $\mu\text{g/l}$ = micrograms per liter; TPH = total petroleum hydrocarbons

2. **ORC Placement in Excavation.** ACEH staff requested specification of design parameters for Oxygen Release Compound (ORC) treatment and an estimate for its effectiveness in treating the contamination.

Based on discussions with Mr. Don Hwang and Ms. Donna Drogos of the ACHCSA on September 8, 2004, concerning additional investigation of deeper soil and groundwater proposed in LFR's report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004, LFR considers the potential use of ORC as part of the interim remedial plan for the Site premature. If it is determined that ORC can be successfully utilized at the Site as part of the remedial plan, LFR will submit design parameters to the ACHCSA for review and approval prior to implementation.

REQUEST FOR ADDITIONAL INFORMATION

The ACEH staff requested submittal of previously prepared reports that were not located in the ACHCSA files. On September 3, 2004, LFR submitted to the ACHCSA reports in LFR's files that were apparently missing from the ACHCSA files. The list of the reports is attached.

TECHNICAL REPORT REQUEST

The ACEH staff requested submittal of this addendum, missing reports, Machado requirements, quarterly groundwater monitoring reports, and an interim remediation completion report.

This letter serves as the addendum; the missing reports were submitted to the ACHCSA on September 3, 2004. The letter providing the information pursuant to the Machado requirements will be submitted to the ACHCSA on September 17, 2004, as agreed upon by Mr. Hwang of ACHCSA on September 14, 2004 with Ms. Kimberly Brandt of LFR.

Regarding groundwater monitoring for the Site, it is currently the responsibility of the Greater Bay Trust Company to conduct groundwater monitoring for the Site. Bond will contact the Greater Bay Trust Company to assess status of groundwater monitoring activities for the Site. Bond will provide Mr. Hwang with any updated information as it is obtained. Bond anticipates that it will be able to conduct future groundwater monitoring events on behalf of the Greater Bay Trust Company.

ACEH staff has requested that an Interim Remediation Completion report be submitted by December 1, 2004. LFR requests that this date be changed to "60 days following completion of the Interim Remediation activities," as described in the RCAP. LFR will notify the ACEH staff when the interim remediation activities are scheduled to begin.

LFR is currently revising its report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004, based on Mr. Hwang's verbal comments received during the September 8, 2004 telephone conversation. This revised report will include additional recommendations to assess the vertical extent of soil and groundwater contamination in the vicinity of the former gasoline underground storage tank (UST) and an investigation in the backfill in the utility corridor nearest the Site, in addition to the vertical extent investigation proposed in the vicinity of the former waste oil UST.

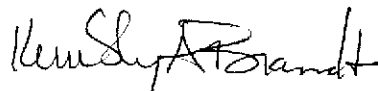
Bond and LFR request that the ACHCSA review and approve this addendum to the June 25, 2004 RCAP.

If you have any questions or comments, please contact the undersigned at (510) 652-4500.

Sincerely,



Charles H. Pardini, R.G.
Principal Geologist
Assistant Operations Manager



Kimberly A. Brandt, R.G., C.HG.
Senior Associate Hydrogeologist

cc: Robert Bond, Bond Companies

Attachment: Transmittal letter to Mr. Don Hwang of ACHCSA, dated September 3, 2004

September 3, 2004

LETTER OF TRANSMITTAL
001-09171-11

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

Re: Reports - Former Cox Cadillac Site

The following items are Enclosed via Courier

Description	No. of Copies
Five reports (listed below)	1 of each

The item(s) are transmitted: At your request For your action
 For your review/comment For your files
 For your approval For your information

Comments:

Don,

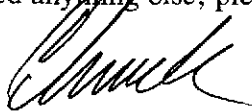
Enclosed are the five reports concerning the former Cox Cadillac site that we have that were not included on the list in your August 31, 2004 letter.

- 1) Report on a Limited Phase I Environmental Site Assessment and Limited Asbestos and Lead-Based Paint Surveys at the Former Cox Cadillac Property, Oakland, California, prepared by LFR and dated September 1, 2000.
- 2) Workplan Monitoring Well Installation, Resumption of Enhanced Bio-Remediation, and Resumption of Quarterly Sampling, prepared by PES and dated August 29, 2001.

- 3) Report of UST Closure Activities, prepared by EOA, Inc. and dated February 1994.
- 4) Geotechnical Investigation Cox Cadillac Site Development, prepared by Treadwell & Rollo and dated July 6, 2004.
- 5) Geotechnical Investigation for Proposed Development, prepared by GeoForensics and dated May 2001.

If you need anything else, please call me at (510) 596-9536.

Chuck

A handwritten signature in cursive script, appearing to read 'Chuck', written in black ink.

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

August 31, 2004

Mr. Rob Bond
Bond Companies
350 W. Hubbard Street, Suite 4560
Chicago, Illinois 60610

Mr. Bill Cox
Bill Cox Cadillac & Buick
C/o 100 Pine St., Suite 2100
San Francisco, CA 94163

The Greater Bay Trust Company
c/o Lance Shoemaker, Esq.
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard Trust, and the Lisa C. Shepard Trust
Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP.
333 Market Street, Suite 2300
San Francisco, California 94105
Dear Messrs. Bond, Cox, & Shoemaker:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland, CA

Alameda County Environmental Health (ACEH) staff has recently reviewed "Revised Corrective Action Plan" dated June 25, 2004, prepared by Levine Fricke. We found the proposed CAP to be incomplete and are unable to concur with the proposed CAP. A CAP at this time is premature, as additional investigation is needed at this site. However, we generally concur with the remediation proposal in the CAP of excavating contaminated soil as interim remediation. We request that you address the following technical comments, perform the proposed interim remediation work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) **Excavation Cleanup Levels and Cleanup Goals** - We concur with implementation of the excavation activities proposed in the CAP, dated June 25, 2004, prepared by Levine Fricke, as an interim remedial action. However, the remediation proposal does not include excavation cleanup levels and cleanup goals in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with San Francisco Regional Water Quality Control Board Basin Plan. Please submit appropriate cleanup levels; and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 as an Addendum (Interim Remediation) by the date specified below.
- 2) **ORC Placement in Excavation** - Please specify the design parameters for your ORC treatment and indicate how long the ORC is expected to be effective in treating contamination.

Alameda County
UL 05 2004
Environmental Health

Messrs. Bond, Cox & Shoemaker

August 31, 2004

Page 4 of 4

Please provide a list of all record fee titleholders to the site, certification of the notification requirement, and the telephone numbers for the "responsible parties" by **September 15, 2004**.

PERJURY STATEMENT

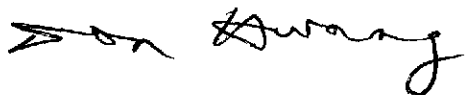
Please note, all work plans and technical reports submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or 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. A review of our case file indicates that none of your reports contain a perjury statement. **We request that perjury statements be submitted with all future reports for this site.**

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 follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Section 25299.76.

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

Sincerely,



Don Hwang

Hazardous Materials Specialist
Local Oversight Program

C: Charles Pardini, Levine-Fricke, 1900 Powell St., 12th Floor, Emeryville, CA 94608-1827
Donna Drogos
File



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY

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

[Handwritten signature]



- Forwarding Order - No Fee
- Forwarding Order - Fee
- Forwarding Address
- Return - Not Returned
- Undelivered - Return to Sender
- Addressed - Not Forwarded
- No such Office
- No such Office - Return to Sender
- Vacant
- No such Office - Return to Sender
- One Office - Not Forwarded
- Return to Post Office
- Postage Due

not at this address

Mr. Bill Cox
Bill Cox Cadillac & Buick
C/o 100 Pine Street., Suite 2100
San Francisco, CA 94163





1 October 2003

Mr. Don Hwang
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Alameda County

OCT 09 2003

Environmental Health


RE: **Former Cox Cadillac Facility 320 Bay Place, Oakland, California**
LOP Case RO-0000148

Dear Mr. Hwang:

ETIC Engineering, Inc. (ETIC) has prepared this correspondence to advise you of a change in the environmental consultant for the referenced site. Please copy all future correspondences related to the site to my attention at ETIC (see address on letterhead). It is our understanding that PES Environmental, Inc. (PES) submitted a supplemental investigation work plan and an addendum to that work plan for the above referenced site (dated January 24, 2003 and May 21, 2003, respectively). In addition, we also understand that a letter from your office dated June 20, 2003 was issued stating that you were in generally agreement with the proposed work but requested additional work. The proposed scope of work for the site includes the work described in the January 24, 2003 and May 21, 2003 work plans with the modifications requested in your letter dated June 20, 2003.

I am looking forward to working with you on this project and if you have any questions, please call me at (510) 208-1600 ext. 16.

Sincerely,
ETIC Engineering, Inc.



Luis A. Fraticelli, R.G.
Senior Project Manager

Cc: Lance Shoemaker, Hanson, Bridgett, Marcus, Vlahos, & Rudy-333 Market Street,
Suite 2300, San Francisco, CA 94105

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

June 20, 2003

Greater Bay Trust Co.
C/o Leah S. Goldberg, Esq.
Hanson, Bridgett, Marcus, Vlahos & Rudy
333 Market St., Suite 2300
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Fuel Leak Case No. RO0000148,
Former Cox Cadillac, 230 Bay Pl., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Addendum to Workplan Supplemental Site Investigation" dated May 21, 2003, and "Former Waste Oil UST Documentation" dated June 13, 2003, both by PES Environmental, Inc. and generally concur with the work proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

TC 3, TC 4, TC 5) Waste Oil Tank Area Sampling - In addition to the high contaminant concentrations in groundwater previously noted, the inspection report of the tank removal dated December 1, 1988, indicated a strong hydrocarbon odor from the excavated soil. Floating product was observed on water in the bottom of the excavation. Holes were noted in the sides of the waste oil tank. Also, there is no information indicating that any residual contaminated soil or groundwater were removed from the excavation. The proposed grab groundwater sampling is inadequate for lateral and vertical soil and groundwater delineation from the Waste Oil Tank, additional sampling will be required. Please propose additional borings to delineate soil and groundwater contamination from the former waste oil tank area.

TC 5) Depth of Proposed Borings - Boring depths need to be of sufficient depth to delineate the vertical extent of leaks from the tank and piping. The proposal for collection of soil samples at 3 to 4 feet below ground surface (bgs) may be adequate for the piping area. Field observations during drilling and analytical results will determine if the sampling depths are adequate. PES Environmental proposes to collect soil samples from 8 and 12 feet bgs in the tank area. Instead, we request that you continuously core your borings and based on field observations choose to sample where there is likely to be the most contamination and for

Ms. Goldberg
June 20, 2003
Page 2 of 2

delineation. As stated previously, field observations and analytical results will determine if the sampling depths are adequate.

1) Utility Trenches Groundwater Sampling - Depth to water measurements from your wells show that groundwater has been shallower than 2 feet bgs indicating that the utility trenches may be preferential pathways for the spread of contamination from your site. We request that you perform groundwater sampling within the utility trenches in the vicinity of your site.

TECHNICAL REPORT REQUEST

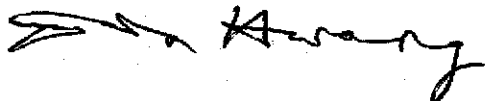
Please send the following technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

July 31, 2003 - Proposal for Soil and Groundwater Sampling by the Waste Oil Tank
July 31, 2003 - Quarterly Report for the 2nd Quarter 2003
October 31, 2003 - Utility Trenches Groundwater Sampling Report
October 31, 2003 - Boring Sampling by the former Gasoline Tank Report
October 31, 2003 - Quarterly Report for the 3rd 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 Materials Specialist
Local Oversight Program

Enclosure

C: Francois Bush, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA
94947-7021
Donna Drogos
File



TRANSMITTAL

TO: Mr. Don Hwang
Alameda County Environmental Health Services

FROM: François Bush - PES Environmental, Inc.

DATE: June 13, 2003

SUBJECT: Former Waste Oil UST Documentation
Former Cox Cadillac Facility
230 Bay Place
Oakland, California

cc: Lance Shoemaker, Esq. – Hanson, Bridgett

PROJECT NO.: 167.002.04.001

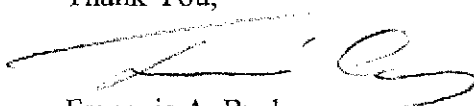
Alameda County
JUN 16 2003
Environmental Health

Enclosed with this transmittal letter is documentation regarding removal of the waste oil UST from 230 Bay Place, Oakland, California. The waste oil UST was removed in December 1988, by R.S. Egan and Company (Egan). Egan produced an *Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report* following removal of the UST on December 5, 1988. The report was submitted to the Alameda County Health Care Services – Department of Environmental Health (ACDEH) on December 6, 1988.

Other correspondence between Egan, ACDEH, and the City of Oakland regarding removal of the waste oil UST is included with this transmittal. These documents are submitted to you in response to your April 16, 2003 letter to Greater Bay Trust Company, trustee for the former owners of 230 Bay Place.

Please call me at (415) 899-1600 if you have any questions or would like to discuss these documents further.

Thank You,


François A. Bush
Senior Geologist

Enclosures



PES Environmental, Inc.
Engineering & Environmental Services

Date: 06/13/03 5:16 PM

FAX TRANSMITTAL

Number of pages including cover sheet: 4

To:	Don Hwang Alameda County Environmental Health Services
Fax:	(510) 337-9335
Office:	(510) 567-6700
Subject:	Former Waste Oil UST Documentation 230 Bay Place (Former Cox Cadillac) Oakland, CA
Cc:	Lance Shoemaker – Hanson Bridgett Fax: (415) 541-9366

From: PES Environmental, Inc.
1682 Novato Blvd., Suite 100
Novato, California 94947

Phone: (415) 899-1600

Fax Phone: (415) 899-1601

Sent By: François Bush

PES Project: 167.002.04

Hardcopy to follow: x Yes No

Urgent For your review Reply ASAP Please Comment

REMARKS: Please find attached a copy of the original *Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report* completed by R.S. Egan and Company (Egan) on December 5, 1998 for the former waste oil UST at 230 Bay Place, Oakland, California. The report was submitted to Alameda County Health Care Services – Department of Environmental Health (ACDEH) on December 6, 1998.

Other correspondence between Egan, ACDEH, and the City of Oakland has been compiled and will be mailed to you for delivery on Monday, June 16. These documents are submitted to you in response to your April 16, 2003 letter to Greater Bay Trust Company, trustee for the former owners of 230 Bay Place.

Please call me if you would like to discuss these documents further.

Thank You

R. S. EAGAN & ()
150-K Mason Circle
CONCORD, CALIFORNIA 94520
(415) 682-3636

shepard
LETTER OF TRANSMITTAL

DATE	12-06-88	JOB NO	B-134
ATTENTION	Mr. Dennis Byrne		
RE	Bill Coe Cadillac Tank Removal		
	DEC-5 11:13		

TO ALABAMA County Health Care Services
80 Susan Way, Rm 200
Oakland, CA 94621

WE ARE SENDING YOU Attached Under separate cover via _____ the following items:

- Shop drawings
- Prints
- Plans
- Samples
- Specifications
- Copy of letter
- Change order
- Release Form

COPIES	DATE	NO.	DESCRIPTION
1	12-06-88	1	UNAUTHORIZED RELEASE REPORTING FORM

THESE ARE TRANSMITTED as checked below:

- For approval
- For your use
- As requested
- For review and comment
- FOR BIDS DUE _____ 19 _____
- Approved as submitted
- Approved as noted
- Returned for corrections
- Resubmit _____ copies for approval
- Submit _____ copies for distribution
- Return _____ corrected prints
- PRINTS RETURNED AFTER LOAN TO US

REMARKS

WE EXPECT RESULTS OF SOIL SAMPLING NEXT WEEK

COPY TO _____

SIGNED: Bob Carson

Shepard

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED AGENCY EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 251132 OF THE HEALTH AND SAFETY CODE.
REPORT DATE 11/24/01 5:18 PM	CASE #	SIGNED: _____ DATE: _____

REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Robert S. Corsun	PHONE (415) 682-3636	SIGNATURE <i>Robert S. Corsun</i>
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER Contractor	COMPANY OR AGENCY NAME R.S. Eagan and Company	
	ADDRESS 150-R Mason Circle Concord CA 94520		

RESPONSIBLE PARTY	NAME Wells Fargo Bank Trustee for Harold Sheppard Trust <input type="checkbox"/> UNKNOWN	CONTACT PERSON Mary Ellen Idziak	PHONE (415) 396-6742
	ADDRESS 588 Market Street, 17th Floor San Francisco CA 94163		

SITE LOCATION	FACILITY NAME (IF APPLICABLE) Bill Cox Cadillac	OPERATOR Frank Jessup	PHONE (415) 451-2400
	ADDRESS 230 Bay Place Oakland Alameda 94604		
	CROSS STREET 27th & Harrison	TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> OTHER mixed	TYPE OF BUSINESS <input type="checkbox"/> FARM <input checked="" type="checkbox"/> OTHER Auto Dealer

IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care	AGENCY NAME	CONTACT PERSON Dennis Byrne	PHONE (415) 271-4320
	REGIONAL BOARD			PHONE ()

SUBSTANCES INVOLVED	(1) Diesel Fuel	NAME	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN
	(2) Waste Motor Oil		<input checked="" type="checkbox"/> UNKNOWN

DISCOVERY/ABATEMENT	DATE DISCOVERED 11/20/01 8:18 PM	HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> OILS AND GREASE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER
	DATE DISCHARGE BEGAN UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 11/20/01 8:18 PM	

SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER	TANKS ONLY CAPACITY 3,000 GAL	MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER
		AGE UNKNOWN		

CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
-----------	--

CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input checked="" type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES
----------------	--

REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CS) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (BT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HL) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)
-----------------	--

ALL HAS BEEN REMOVED AND SOURCE OF LEAK ELIMINATED. SAMPLES ARE INTO LAB FOR ANALYSIS. EXPECT RESULTS MID-DECEMBER 1998.



By Facsimile
(510) 337-9335
and U.S. Mail

September 27, 2002

167.002.01.008

Alameda County
OCT 01 2002
Environmental Health

Mr. Don Hwang, Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services, Environmental Protection
Local Oversight Program
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Fuel Leak Case No. RO0000148
Former Cox Cadillac
230 Bay Place, Oakland, California

Dear Don:

I wanted to briefly document our telephone conversation today regarding your letter of July 31, 2002, wherein you requested submittal of a work plan addendum by October 1, 2002. As we agreed in our call, the work plan addendum will be prepared and submitted within one to two weeks, after we have had a chance to discuss the technical issues raised in your letter, and we have come to an agreement on the appropriate course of action going forward.

The quarterly monitoring reports should have already been delivered to your office.

Thank you, and I look forward to working with you to direct this case toward closure.

Very truly yours,

PES ENVIRONMENTAL, INC.

Robert S. Creps, P.E.
Principal

cc: Rory Campbell

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 31, 2002

Greater Bay Trust Co.
C/o Leah S. Goldberg, Esq.
Hanson, Bridgett, Marcus, Vlahos & Rudy
333 Market St., Suite 2300
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Fuel Leak Case No. RO0000148,
Former Cox Cadillac, 230 Bay Pl., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Addendum to Workplan, Monitoring Well Installation, Resumption of Enhanced Bio-Remediation, and Resumption of Quarterly Sampling" dated December 17, 2001" by PES Environmental, Inc. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) **Site Characterization** – Up to 210,000 microgram (ug/l) Total Petroleum Hydrocarbons – Gasoline (TPHG) and 49,000 ug/l Benzene have been detected in off-site monitoring well TW-7, located 15' downgradient from the former gasoline Underground Storage Tank (UST). Hydropunch samples collected in the intersection of Bay Place and Vernon Street, downgradient of TW-7, were predominately NonDetectable (ND) for the constituents of concern (HP-1 detected 1.3 ug/l Benzene). The presence of utility lines in the street between TW-7 and the hydropunch sampling locations have been noted in previous report(s) for this site ("Corrective Action Plan Development Report, Phase 1," dated April 1, 1996, prepared by EOA, Inc.). Depth to water measurements from your wells show that groundwater has been shallower than 2' below ground surface (bgs) indicating that the utility trenches may be preferential pathways for the spread of contamination from your site.

Additionally, up to 8,700 ug/l Methyl Tertiary-Butyl Ether (MTBE) has been detected in wells immediately downgradient of your former gasoline UST. Up to 800 ug/l MTBE has also been detected in on-site well MW-1 in the vicinity of your former waste oil UST. The Quarterly Report, dated April 25, 2002, prepared by PES Environmental, Inc., (PES) suggests that downgradient detections of MTBE are due to an unidentified off-site source migrating through the aforementioned utility lines. PES also reports that on-site monitoring wells tested ND for MTBE in 1993, however analytical data tables show that analysis for MTBE was not performed until 1999 at this site. While the presence or absence of MTBE may be discerned from historic samples by having your analytical laboratory review their chromatographs and report results for MTBE there is no documentation in the County file of these results.

The lateral and vertical extent of contamination associated with your site is not defined. We request that you define the groundwater plume associated with your site. Also, rather than installing an additional groundwater monitoring well (MW-3) crossgradient of your site, we request that you perform groundwater sampling within the utility trenches in the vicinity of your site. Submit your proposal for plume definition in the work plan requested below.

- 2) **Enhanced Bioremediation** - PES reports successful results with enhanced bioremediation in TW-6 but no success in MW-2 and TW-7 due to low numbers of hydrocarbon degrading bacteria. PES proposes to introduce a culture of hydrocarbon degrading bacteria into monitoring wells at the site and add nutrients over a four-year period. The work plan also proposes to collect groundwater samples, which will be analyzed and then evaluated by a microbiologist to determine an appropriate batch culture for introduction into the wells. Please indicate the analyses that will be performed, how these results will determine the composition of the batch culture, provide documentation which demonstrates that this approach would work, and is safe. Additionally, as wells MW-2 and TW-7 have not seen a decrease in contaminant concentration during the pilot program we cannot endorse you to conduct your enhanced bioremediation program over a four-year period.
- 3) **Groundwater Cleanup Objectives** – a) The work plan proposes using 10,000 ug/l as the cleanup standard for TPHG. Alternatively, we approve of using the ceiling value of 5,000 ug/l found in the State Regional Water Quality Control Board (SRWQCB)'s "Application of Risk Based Screening Levels and Decision Making to Sites with Impacted Soil and Groundwater" dated December 2001.
b) The work plan also proposes using Oakland-specific Tier 2 site specific target levels. However, the site does not appear to meet the eligibility criteria for its use. Please review the Oakland RBCA Eligibility Checklist.
- 4) **Fuel Oxygenate and Additive Analysis** - Groundwater analyses for fuel oxygenates and additives have not been performed at your site. Please collect and analyze groundwater samples for the following compounds: Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), Ethylene

Ms. Goldberg
July 31, 2002
Page 3 of 4

Dibromide (EDB), and Ethylene Dichloride (EDC) by EPA Method 8260. Report your results in the Quarterly Report requested below.

- 5) **Tank Excavation Soil Residual Contamination** - A soil sample from the north sidewall of the tank excavation, S2, collected on January 27, 1994, found 4,300 mg/kg Total Volatile Hydrocarbons - Gasoline (TVH-G) and 40 mg/kg benzene. The tank excavation has not been over excavated. Over excavation of the pipeline trench on June 22, 1994 resulted in confirmation samples of 700, 620, and 260 mg/kg TVH-G, for S-3, S-4, and S-5, respectively. Over excavation pipeline sample results for benzene were 7.3, 6.1, and 3.1 mg/kg for S-3, S-4, and S-5, respectively. These soil residual concentrations need to be evaluated for risk to human health and the environment.
- 6) **Analytical Data Tables** - A review of analytical data from your site indicates that historical groundwater concentrations are reported incorrectly in some cases and data for additional analyses e.g., EDC and EBD are not reported in your tables. We request that you revise your tables to include all groundwater analytical results for the site and include these updated tables in all future reports submitted for this site.

TECHNICAL REPORT REQUEST

Please send the following technical reports to Alameda County Environmental Health (Attention: Don Hwang) by **October 1, 2002**:

Work Plan Addendum

Quarterly Report for the First Quarter 2002

Quarterly Report for the Second Quarter 2002

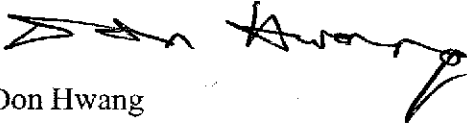
Quarterly Report for the Third Quarter 2002

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.

Ms. Goldberg
July 31, 2002
Page 4 of 4

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", with a stylized flourish at the end.

Don Hwang

Hazardous Materials Specialist
Local Oversight Program

C: Francois Bush, Andy Briefer, PES Environmental, Inc., 1682 Novato Blvd., Suite 100,
Novato, CA 94947-7021

✓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

September 19, 2001

Greater Bay Trust Co.
C/o Leah S. Goldberg, Esq.
Hanson, Bridgett, Marcus, Vlahos & Rudy
333 Market St., Suite 2300
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

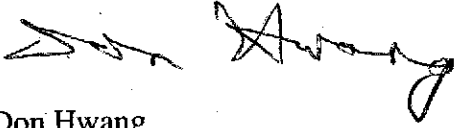
Subject: Former Cox Cadillac, 230 Bay Pl., Oakland, CA
RO0000148

"Workplan, Monitoring Well Installation, Resumption of Enhanced Bio-Remediation, and Resumption of Quarterly Sampling" dated August 29, 2001" by PES Environmental, Inc., was reviewed. 1) We concur with the procedures for continued groundwater monitoring using the existing wells. 2) The installation of an offsite well between TW-7 and the intersection of Bay Place and Harrison Street to provide additional hydrogeologic data to assess the lateral extent of the hydrocarbon affected groundwater was proposed. However, the well construction specifications were incomplete. Include screen length and interval, depth interval, bottom cap or plug, etc. 3) The City of Oakland Risk-Based Corrective Action (RBCA) Tier 2 Site Specific Target Levels does not include Total Petroleum Hydrocarbons-Gasoline (TPH-G). TPH-G concentrations also need to be evaluated for human health and environmental risks using accepted risk assessment thresholds. 4) Bio-remediation of groundwater using cultured bacteria and periodic introduction of enriched water followed with Oxygen Releasing Compound (ORC) was proposed. Previously, bio-remediation using enriched water and ORC was tried at monitoring wells MW-2 and TW-7 but the groundwater contaminant concentrations did not decrease and the concentrations have in fact increased in MW-2 since the introduction of enriched water in March 1999. Provide documentation which demonstrates that this approach could be feasible. 5) Sampling of the trenches is required to indicate if the trenches are intercepting the onsite plume or are being used as pathways for an offsite source.

Ms. Goldberg
September 19, 2001
Page 2 of 2

Please provide an addendum to the workplan that will address the above concerns. If you have any questions, I may be reached at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist

u
C: Francois Bush, Andy Briefer, PES Environmental, Inc., 1682 Novato Blvd., Suite
100, Novato, CA 94947-7021

✓ File



PES Environmental, Inc.
Engineering & Environmental Services

Date: 07/20/01 11:00 AM

FAX TRANSMITTAL

Number of pages including cover sheet: 2

To:	Don Hwang Alameda County Environmental Health Services
Fax:	(510) 337-9335
Office:	(510) 567-6700
Subject:	Proposed Monitoring Well location 230 Bay Place (Former Cox Cadillac) Oakland, CA

From: PES Environmental, Inc.
1682 Novato Blvd., Suite 100
Novato, California 94947

Phone: (415) 899-1600

Fax Phone: (415) 899-1601

Sent By: François Bush

PES Project: 167.002.01

Hardcopy to follow: Yes x No

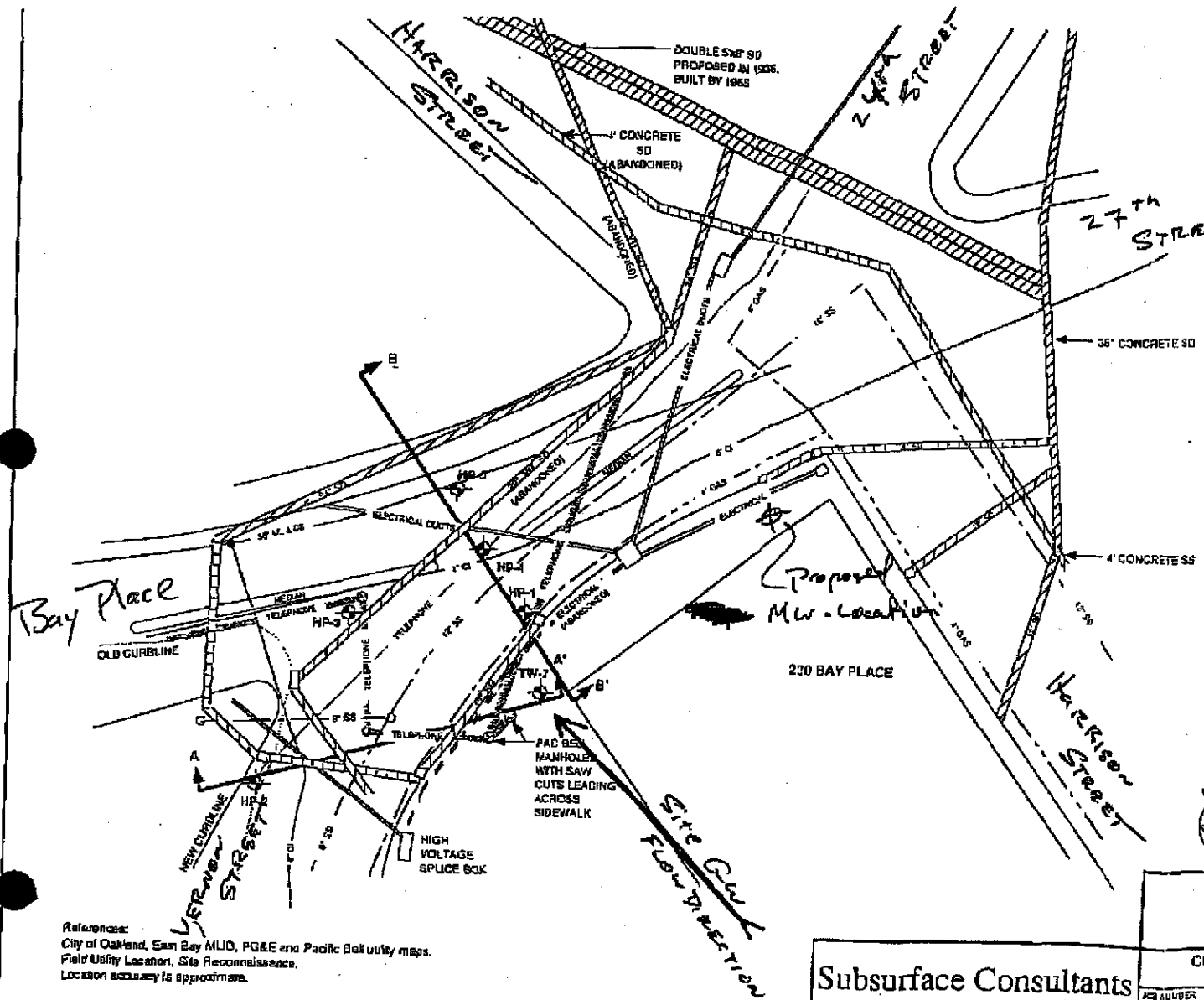
Urgent For your review Reply ASAP Please Comment

REMARKS: Here is a copy of the utility plan from EOA's CAP Development Report. As you can see, there are quite a number of utility trenches out in front of the site running perpendicular to our measured groundwater flow direction. We feel we need further information on the effect these trenches may be having on groundwater flow in the site vicinity. Please call me at (415) 899-1600 to set up a time to talk with you and Eva Chu about the proposed location of the well.

Thank You,

François Bush

If this transmittal has been received in error, please contact
PES ENVIRONMENTAL, INC at your earliest convenience (415) 899-1600.



EXPLANATION	
	SANITARY SEWER
	STORM DRAIN
	GAS LINE
	TELEPHONE LINE
	WATER LINE
	CROSS SECTION
	TEST BORING LOCATION

Reference:
 City of Oakland, San Bay MUD, PG&E and Pacific Bell utility maps.
 Field Utility Location, Site Reconnaissance.
 Location accuracy is approximate.

Subsurface Consultants

UTILITY PLAN		
COX CADILLAC - 230 BAY PLACE OAKLAND, CALIFORNIA		
FIGURE NUMBER	DATE	APPROVED
805.007	3/15/95	3

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 6, 2001

Greater Bay Trust Co.
C/o Leah S. Goldberg, Esq.
Hanson, Bridgett, Marcus, Vlahos & Rudy
333 Market St., Suite 2300
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Former Cox Cadillac, 230 Bay Pl., Oakland, CA
Stld 494

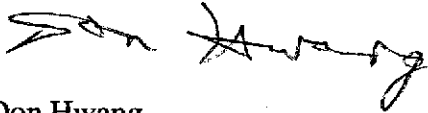
"Transmittal, Quarterly Groundwater Monitoring and Year-End Bio-Remediation Evaluation Report & Recommendations, ..." and "Quarterly Groundwater Monitoring and Year-End Bio-Remediation Evaluation Report & Recommendations, ..., May 24, 2000" by PES Environmental, Inc., were reviewed. 1) We concur with the recommendation to continue groundwater monitoring using the existing wells. 2) The other recommendation is the installation of an offsite well between TW-7 and the intersection of Bay Place and Harrison Street to assess if offsite sources are migrating toward the site. We believe sampling of the trenches may indicate if the trenches are being used as pathways. However, an explanation is needed for how the installation of a well at the location suggested is indicative of an offsite source, and whether additional sampling of the trenches is required to make this determination, and also if the trenches are intercepting the onsite plume. 3) Additionally, Andy Briefer, PES Environmental, Inc., stated that he wished to try bioremediation again at monitoring wells MW-2 and TW-7 but instead use bacterial cultures from the other monitoring wells. We would need to evaluate documentation which demonstrates that this approach could be feasible for monitoring wells MW-2 and TW-7. Previously, bio-remediation using enriched water and ORC was tried at these wells but the groundwater contaminant concentrations did not decrease and the concentrations have in fact increased in MW-2 since the introduction of enriched water in March 1999.

Ms. Goldberg
April 6, 2001
Page 2 of 2

A workplan must be submitted for sampling of the trenches and bioremediation of monitoring wells MW-2 and TW-7.

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

Sincerely,



Don Hwang
Hazardous Materials Specialist

w
C: Andy Briefer, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato,
CA 94947

✓ File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

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

May 28, 1999

STID 494

Bill Cox
Bill Cox Inc.
C/o 100 Pine Street, Suite 2100
San Francisco, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Cox:

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

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

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

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

LANDOWNER NOTIFICATION

Re: 230 Bay Pl., Oakland, CA 94612

May 28, 1999

Page 2 of 2

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

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

Please call me at (510) 567-6782 should you have any questions about the content of this letter.

Sincerely,

Thomas Peacock, Manager
Environmental Protection Division

Attachments

cc: Chuck Headlee, RWQCB

LOP - CHANGE RECORD REQUEST FORM

printed:
05/28/99

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

Insp:

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 12035
 StID : 494 LOC: 10/14/98
 SITE NAME: Bill Cox Cadillac & Buick DATE REPORTED : 12/01/88
 ADDRESS : 230 Bay Pl DATE CONFIRMED: 12/01/88
 CITY/ZIP : Oakland 94612 MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: O CONTRACT STATUS: 4 PRIOR CODE:1C4 EMERGENCY RESP: -0-
 RP SEARCH: S DATE COMPLETED: 03/17/92
 PRELIMINARY ASMNT: U DATE UNDERWAY: 02/22/93 DATE COMPLETED: -0-
 REM INVESTIGATION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 REMEDIAL ACTION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 POST REMED ACT MON:- DATE UNDERWAY: -0- DATE COMPLETED: -0-

ENFORCEMENT ACTION TYPE: 2 DATE ENFORCEMENT ACTION TAKEN: 01/04/94
 LUFT FIELD MANUAL CONSID: 3HSCA DATE CASE CLOSED: -0-
 CASE CLOSED: - REMEDIAL ACTIONS TAKEN: ED
 DATE EXCAVATION STARTED : 12/01/88

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Bill Cox
 COMPANY NAME: Bill Cox Inc.
 ADDRESS: C/o 100 Pine St. Ste 2100
 CITY/STATE: San Francisco, C A 94111

RP#2-CONTACT NAME: H.w. Shepard Jr.
 COMPANY NAME: Wells Fargo Bank Trust
 ADDRESS: Po Box 63700
 CITY/STATE: San Francisco C A 94163

INSPECTOR VERIFICATION:

NAME _____ SIGNATURE _____ DATE _____

DATA ENTRY INPUT:

Name/Address Changes Only

Case Progress Changes

ANNPMS _____ LOP _____ DATE _____

LOP _____ DATE _____

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



RECEIVED APR 12 1999

DAVID J. KEARS, Agency Director

April 8, 1999
STID 494

Bill Cox Cadillac-Buick
ATTN: Bill Cox
232 E. 14th St.
San Leandro, CA 94577

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700 FAX (510) 337-9335
H. W. Shephard, Jr.
Wells Fargo Bank Trust
P.O. Box 63700
San Francisco, CA 94163

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

This office had a meeting with PES Environmental, Inc. on March 31, 1999 concerning the above site. This site is all one site and the difference of opinion concerning the ownership of a waste oil tank and a fuel tank has not made it two sites. The contamination remaining has been determined to be from the fuel tank. The entire area has had varying sources of contamination, especially with the tank, known leaking piping, and a remote fuel dispenser. The former waste oil tank area is not currently being seen as a source of current contamination.

Fresh leaded gas is more consistent with a gas tank, even one recently used for unleaded gas, than from a waste oil tank. What is especially notable is that a sample in 1993 near the waste oil tank contained no TOG, a main indicator of waste oil contamination.

It was also mentioned that PES was working on a summary report, and a workplan for the addition of another monitoring well within the next two months. If you have any questions, please contact this office at (510) 567-6782.

Sincerely,

Thomas Peacock, Manager

Division of Environmental Protection

c: Dick Pantages, Chief - TP - files
Will Mast and Andrew Briefer, PES Environmental,
Inc., 1682 Novato Blvd., Suite 100, Novato, CA 94947
Cheryl Gordon, UST Cleanup Fund

1999-04-08 14:40
 510 337 9335
 ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
353	415 899 1601	04-08 14:40	00' 30	01/01	OK		

745-402046

ALAMEDA COUNTY
 HEALTH CARE SERVICES
 AGENCY



DAVID J. KEARS, Agency Director

April 8, 1999
 STID 494

Bill Cox Cadillac-Buick
 ATTN: Bill Cox
 232 E. 14th St.
 San Leandro, CA 94577

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

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Dear Bill Cox:

This office had a meeting with PES Environmental, Inc. on March 31, 1999 concerning the above site. This site is all one site and the difference of opinion concerning the ownership of a waste oil tank and a fuel tank has not made it two sites. The contamination remaining has been determined to be from the fuel tank. The entire area has had varying sources of contamination, especially with the tank, known leaking piping, and a remote fuel dispenser. The former waste oil tank area is not currently being seen as a source of current contamination.

Fresh leaded gas is more consistent with a gas tank, even one recently used for unleaded gas, than from a waste oil tank. What is especially notable is that a sample in 1993 near the waste oil tank contained no TOG, a main indicator of waste oil contamination.

It was also mentioned that PES was working on a summary report, and a workplan for the addition of another monitoring well within the next two months. If you have any questions, please contact this office at (510) 567-6782.

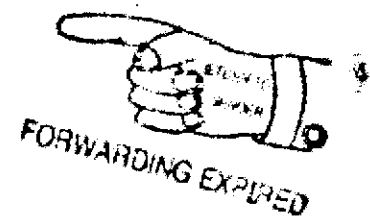
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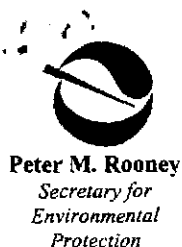


ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Department Of Environmental Health
Environmental Protection Division
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

POSTAL
SECTION
99 APR 15 AM 10 07

Bill Cox Cadillac-Buick
ATTN: Bill Cox
232 E. 14th St
San Leandro, Ca. 94577





State Water Resources Control Board

John P. Caffrey, Chairman



Division of Clean Water Programs

2014 T Street, Suite 130 • Sacramento, California 95814 • (916) 227-4539 FAX (916) 227-4530
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustcf/fundhome.htm>

STID # 494
TP

OCT 14 1998

98 OCT 16 PM 2:51
ENVIRONMENTAL PROTECTION

Bill Cox Cadillac-Buick
c/o: William L. Cox Sr.
1476 Ardmore Dr
San Leandro, CA 94577

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 8721, FOR SITE ADDRESS:
230 BAY PL, OAKLAND

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$81,500. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

It is very important that you read the terms and conditions listed in the enclosed LOC. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is very important that you make use of the funding that has been committed to your cleanup in a timely manner.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call David Hallstrom, our Technical Reviewer assigned to claims in your Region, at (916) 227-4519. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.

The following documents needed to submit your reimbursement request are enclosed:

- "Reimbursement Request Instructions" package. **Retain this package for future reimbursement requests.** These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are samples of completed reimbursement request forms and spreadsheets.
- "Bid Summary Sheet" to list information on bids received which **must be completed and returned.**
- "Reimbursement Request" forms which you **must use to request reimbursement of costs incurred.**
- "Spreadsheet" forms which you **must use in conjunction with your reimbursement request.**

THIS IS IMPORTANT TO YOU, PLEASE NOTE:

You have 90 calendar days from the date of this letter to submit your first reimbursement request for incurred corrective action costs. **NO EXTENSIONS CAN BE GRANTED.** If you fail to do so, your LOC funds will automatically be reduced to zero (deobligated). Once this occurs, any future funds for this site are subject to availability when you submit your first reimbursement request. We continuously review the status of all active claims. You must continue to remain in compliance and submit a reimbursement request every 6 months. Failure to do so will result in the Fund taking steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Anna Torres at (916) 227-4388.

Sincerely,



Dave Deaner, Manager
UST Cleanup Fund Program

Enclosures

cc: Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577





Cal/EPA

**State Water
Resources
Control Board**

Division of
Clean Water
Programs

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4539
FAX (916) 227-4530

World Wide Web
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

APR 22 1998

Bill Cox Cadillac-Buick
c/o: Bob Cross
Hovis, Smith et al.
100 Pine St. 21st Floor
San Francisco, CA 94111

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, STAFF DECISION
FOR NOTICE OF INELIGIBILITY DETERMINATION, CLAIM NUMBER 8721, SITE
ADDRESS: 230 BAY PL, OAKLAND 94612

This is to notify you that during the detailed review of your application, it has been determined that your claim for the subject site is not eligible for reimbursement in the Underground Storage Tank Cleanup Fund. It is being proposed, therefore, that your claim be removed from the Priority List based on the following reason:

According to section 2810.1(6) of the Petroleum Underground Storage Tank Cleanup Fund Regulations, an eligible claimant is, "an owner or operator who has paid or will pay for the costs claimed."

I have made several attempts to contact you to obtain information on the costs that you have incurred in connection with the contamination at the subject site. Each attempt has been unsuccessful. Through a consultant for Wells Fargo Bank, I was able to obtain information on your attorney, Bob Cross, so I contacted him. I spoke with Mr. Cross on January 16, 1998 and February 24, 1998. Each time, I informed him that I needed a current address and phone number for your claim so that I could send any pertinent information to you. He informed me that he would contact you and get back to me. To date, I have not received any updated information for your address or phone number.

Mr. Cross informed me that Bill Cox Cadillac is out of business, and you are no longer in the loop for cleanup purposes at the site. He informed me that the site cleanup is being handled by Wells Fargo Bank, trustee for the Shepard Trust, who also has a claim for the site.

It has already been explained in earlier correspondence to both claimants (Shepard Trust, and Cox Cadillac) that one of the two cannot be reimbursed for the entire cleanup because of the separate ownership held by each claimant.

Since you have apparently not incurred any corrective action costs, your claim should be removed from the Priority List.

494
TP

ENVIRONMENTAL
REGULATION

50 APR 24 AM 7:22



Pete Wilson
Governor



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Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

APR 22 1998

If you disagree with this Staff Decision, you may either request review and reconsideration by the Program Manager or you may formally appeal the decision and request a Division Decision from the Chief of the Division. A request for reconsideration along with any additional documentation should be sent to:

Dave Deaner, Program Manager, Claim #8721
UST Cleanup Fund Program
State Water Resources Control Board
Division of Clean Water Programs
P. O. Box 944212
Sacramento, CA 94244-2120


A request to the Chief of the Division must include, at a minimum: (1) a statement describing how the claimant is damaged by the prior Staff Decision; (2) a description of the remedy or outcome desired; and (3) an explanation of why the claimant believes the action or the Staff Decision is erroneous, inappropriate or improper.

The request to the Chief of the Division must be sent to Harry M. Schueller, Chief, Division of Clean Water Programs, at the address listed above.

If you do not request review and reconsideration by the Program Manager or request a Division Decision from the Chief of the Division within thirty (30) calendar days from the date of this letter, the Staff Decision will then become final and conclusive.

If you have any questions, please contact me at (916) 227-4539.

Sincerely,


Cheryl Gordon
Claim Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

Harold Shepard Trust
c/o: Mr. Steven Schulman
Wells Fargo Bank
525 Market St. 18th Floor
San Francisco, CA 94105



MEMORANDUM

TO: Mr. Thomas Peacock - Alameda County Health Care Services Agency
FROM: Chris Rossitto CR
DATE: October 6, 1997
SUBJECT: Bill Cox Cadillac Site, 230 Bay Place, Oakland - Excavation Backfilling
PROJECT NO.: 167.0201.002

PES has received your letter dated October 1, 1997 approving backfilling the excavation at the Bill Cox Cadillac site, 230 Bay Place in Oakland. We have scheduled backfilling and soil disposal activities for Wednesday October 8, 1997.

If you have any questions please call me at 415/899-1600.

cc: Leah Goldberg, Esq., Hanson, Bridgett, Marcus, Vlahos & Rudy
Steven Schulman, Wells Fargo Bank



PES Environmental, Inc.
Engineering & Environmental Services

MEMORANDUM

TO: Mr. Thomas Peacock - Alameda County Health Care Services Agency
FROM: Chris Rossitto CR
DATE: October 6, 1997
SUBJECT: Bill Cox Cadillac Site, 230 Bay Place, Oakland - Excavation Backfilling
PROJECT NO.: 167.0201.002

PES has received your letter dated October 1, 1997 approving backfilling the excavation at the Bill Cox Cadillac site, 230 Bay Place in Oakland. We have scheduled backfilling and soil disposal activities for Wednesday October 8, 1997.

If you have any questions please call me at 415/899-1600.

cc: Leah Goldberg, Esq., Hanson, Bridgett, Marcus, Vlahos & Rudy
Steven Schulman, Wells Fargo Bank

FLASH-FAX	TO: T. Peacock	FROM: C. Rossitto	DATE: 10/6/97
	FAX #: 510/337-9335	PES	PAGES INCLUDING THIS PAGE:
		FAX #:	PHONE #: 415/899-1600

TOPS 14850

1670201M.002

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

October 1, 1997
STID 494

Bill Cox Cadillac-Buick
ATTN: Bill Cox
232 E. 14th St.
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P.O. Box 63700
San Francisco, CA 94163

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

This office has received data concerning excavation, disposal of contaminated soils, and backfilling at the above site. The information was dated 9/10/97 by PES Environmental, Inc. The proposal, based on the sample results, is acceptable to this office.

There does not seem to have been any type of monitoring done at the wells on site for more than a year and yet the Cleanup Fund has authorized expenditure for this activity. Groundwater monitoring and reporting is required to be done as soon as possible. Please call this office at least 3 days prior to conducting the monitoring.

If you have any questions, please contact this office at (510) 567-6782.

Sincerely,

Thomas Peacock, Manager
Division of Environmental Protection

c: Gordon Coleman, Chief - files
Will Mast, PES Environmental, Inc., 1682 Novato Blvd.,
Suite 100, Novato, CA 94947
Steve Marquez, UST Cleanup Fund



Cal/EPA

State Water Resources Control Board

Division of Clean Water Programs

Mailing Address:
P.O. Box 944212
Sacramento, CA 94244-2120

2014 T Street,
Suite 130
Sacramento, CA 95814
(916) 227-4360
FAX (916) 227-4530

World Wide Web
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

June 5, 1997

Harold W. Shepard Trust
c/o Wells Fargo Bank
525 Market St., 18th Floor
San Francisco, CA 94105

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, REMOVAL OF MONIES FROM LETTER OF COMMITMENT (LOC); CLAIM NUMBER 011577; FOR SITE ADDRESS: BAY PLACE & BROADWAY, OAKLAND, CA 94612

It has come to my attention the LOC issued to you in the amount of \$37,000 has not been responded to with a request for reimbursement. Our letter dated January 3, 1997 informed you that you must submit your first reimbursement request for the costs that you reported to have incurred within 90 calendar days from the issue date of the LOC.

This letter is to inform you that the Underground Storage Tank Cleanup Fund Program has made a recent policy change regarding LOC's issued and for which no reimbursement request has been received within 90 days.

The new policy states:

If you do not submit your first reimbursement request for corrective action costs which you have incurred within ninety (90) days from the date the LOC was issued, your funds will automatically be deobligated. Once deobligated, any future funds for this site will be obligated subject to availability of funds at such time when we receive your reimbursement request.

Please submit your reimbursement request with the required documentation within thirty (30) days from the date of this letter. If a response is not received, your funds will automatically be deobligated from your LOC.

If you have any questions, please contact Judi Nash at (916) 227-4527.

Sincerely,

Dave Deaner, Manager
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
2101 Webster St., Ste. 500
Oakland, CA 94612

Mr. Thomas Peacock ✓
Alameda County EHD
1131 Harbor Bay Pkway., 2nd Fl.
Alameda, CA 94502-6577

*Request Address
Correction*



Pete Wilson
Governor

*ST10494
230 Bay (TP)
Place*

to Bay Place & Harrison St. properly



Cal/EPA

**State Water
Resources
Control Board**

**Division of
Clean Water
Programs**

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4484
FAX (916) 227-4530

World Wide Web:
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

JAN 23 1997

494
TP



Pete Wilson
Governor

Ms. Leah S. Goldberg
Attorney at Law
Hanson, Bridgett, Marcus, Vlahos & Rudy, LLP
333 Market Street, Suite 2300
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM (FUND), SITE AT 230 BAY PLACE, OAKLAND, CALIFORNIA, CLAIM NO. 11577(SHEPARD TRUST) AND CLAIM NO. 8721 (COX CADILLAC) 94612

This is in response to your December 20, 1996, letter to Allan Patton. Pertinent facts, as I understand them, are as follows:

The Howard W. Shepard Trust (Trust) is the owner of the site at 230 Bay Place, Oakland, California. Bill Cox Cadillac-Buick Inc. (Cox) owned and operated a 10,000 gallon gasoline underground storage tank on the site from about 1979 until the tank was removed in 1994. Contamination was discovered and corrective action initiated by Cox. Cox filed claim no. 8721 in June 1994. Claim no. 8721 is currently on the Priority "C" list with a rank of 861.

The Trust filed claim no. 11577 in April 1996 as owners of a mineral spirits tank, a waste oil tank, and the 10,000 gallon gasoline tank. The claim was accepted by letter of May 22, 1996, which advised the Trust that they are only eligible for reimbursement of corrective action costs associated with the waste oil and mineral spirits tanks, as the Trust never owned or operated the 10,000 gallon gasoline tank which is the subject of Cox's claim. Claim no. 11577 was placed in Priority "B" and a letter of Commitment was issued on December 10, 1996.

The Trust is motivated to resolve the contamination problems expeditiously and return the property to productive use. Most of the contamination on site is assumed to have come from the 10,000 gallon gasoline tank. Cox is proceeding rather slowly with the site investigation and remediation. There have been discussions between the parties to have the Trust take the lead on investigating and remediating the site. The Trust requests it be assured it will receive reimbursement from the Fund for the costs of remediating the contamination from the 10,000 gallon gasoline tank under the Trust's claim no. 11577.



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Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

To be eligible to file a claim with the Fund, the claimant must be a current or past owner or operator of the underground storage tank from which an unauthorized release has occurred, and be required to undertake corrective action by the regulatory agency. The Trust did not own or operate the 10,000 gallon gasoline tank and technically cannot be reimbursed for the costs of its cleanup. Although the Trust may claim an ownership interest in the 10,000 gallon tank as a "fixture" on the property, Cox was the legal owner of the tank and the only operator. To reimburse the Trust (a priority "B" claimant) for costs that are the responsibility of Cox (a priority "C" claimant) would clearly raise the issue of circumvention of the priority system. I see no indication that Cox is unable to accomplish the needed remediation or that Cox has abandoned the problem to the Trust.

I can appreciate the Trust's desire to expedite the cleanup and return the property to productive use. I have two suggestions that might allow the Trust to proceed as desired. First, the Trust and Cox could agree to be joint claimants under the Cox claim no. 8721. This would allow the Fund to reimburse the joint claimants for costs either incur for the cleanup from their tanks. Second, Cox could authorize the Trust to act as Cox's agent to pursue the needed corrective action work "on behalf" of Cox. The Fund will honor agreements entered into prior to the performance of the corrective action work as long as the agreement does not violate the eligibility or priority provision of the program. The Trust could also advance funds to Cox for the purpose of assisting Cox with their cleanup under conditions where Cox would be required to pursue their claim and reimburse the Trust once reimbursed from the Fund.

As of January 17, 1997, claim no. 8721 is ranked no. 771 on the Priority "C" list. It is impossible for me to accurately project when funding will be available. We currently are issuing Letters of Commitment to claims on the "C" list through rank no. 162 and are processing all claims received through October 31, 1994, (rank no. 861) and getting them ready for award ("on the shelf") for when funding does become available. We anticipate a substantial increase in funding being available for the "C" claims the beginning of our fiscal 97/98 year (starting July 1, 1997), but I cannot provide assurance that the claim will be funded at that time.

If you have any questions, please call me at (916) 227-4484.

Sincerely,



Ron Markle, Chief
Claims Review Unit



Ms. Leah S. Goldberg

-3-

cc: ✓ Alameda County Department Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502



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Resources
Control Board**

**Division of
Clean Water
Programs**

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4307
FAX (916) 227-4530

World Wide Web:
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

STD
494

DR
stat# 494



Pete Wilson
Governor

JAN 0 3 1997

HAROLD W. SHEPARD TRUST
C/O: STEVEN SCHULMAN
WELLS FARGO BANK
525 MARKET ST 18TH FL
SAN FRANCISCO, CA 94105

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 011577, FOR
SITE ADDRESS: BAY PLACE & BROADWAY, OAKLAND 94612

230 Bill Cox Cadillac

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$37,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

It is very important that you read the terms and conditions in the LOC. The State Board will take steps to withdraw this LOC after 90 calendar days from the date of this letter unless you proceed with due diligence with your cleanup effort.

NOTE: You must also submit your first reimbursement request for the costs that you reported to have incurred within 90 calendar days from the date of this letter or submit a written explanation as to the status of the cleanup and when a reimbursement request can be expected. Failure to submit a request or an approved explanation may result in the removal of committed funds. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is important that you make use of the funding that has been committed to your cleanup in a timely manner.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call Patrick Wheeler, our engineer assigned to claims in your Region, at (916) 227-0743. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.



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Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

JAN 0 5 1997


The following documents needed to submit your reimbursement request are enclosed:

- "Reimbursement Request Instructions" package. **Retain this package for future reimbursement requests.** These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are samples of completed reimbursement request forms and spreadsheets.
- "Bid Summary Sheet" to list information on bids received which **must be completed and returned.**
- "Certification of Non-Recovery From Other Sources" which **must be returned before any reimbursements can be made.**
- "Reimbursement Request" forms which you **must use to request reimbursement of costs incurred.**
- "Spreadsheet" forms which you **must use in conjunction with your reimbursement request.**
- "Claimant Data Record" (Std. Form 204) which **must be completed and returned with your first reimbursement request.**

We continuously review the status of all active claims. If you do not submit a reimbursement request or fail to proceed with due diligence with the cleanup, we will take steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Cheryl Gordon at (916) 227-4539.

Sincerely,


Dave Deaner, Manager for
UST Cleanup Fund Program

Enclosures

cc: Mr. Steve Morse
RWQCB, Region 2
2101 Webster St., Ste. 500
Oakland, CA 94612

Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 011577

AMENDMENT NO: 0

CLAIMANT: HAROLD W. SHEPARD TRUST

BALANCE FORWARD: \$0

CO-PAYEE: NONE

THIS AMOUNT: \$37,000

JOINT CLAIMANT: NONE

NEW BALANCE: \$37,000

C/O: WELLS FARGO BANK

ATTN: STEVEN SCHULMAN

CLAIMANT ADDRESS: 525 MARKET ST 18TH FL
SAN FRANCISCO, CA 94105

TAX ID/SSA NO: 94-6504396 94-6504393 94-6359402

Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse HAROLD W. SHEPARD TRUST (Claimant) for eligible corrective action costs at COMMERCIAL PROPERTY BAY PLACE & BROADWAY, OAKLAND, CA 94612 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$37,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 10th day of December, 1996.

STATE WATER RESOURCES CONTROL BOARD

BY [Signature]
Manager, Underground Storage Tank Cleanup Fund Program

BY [Signature]
Chief, Division Administrative Services

STATE USE:
CALSTARS CODING:
0550 - 569.02 - 30530
\$ _____



PES Environmental, Inc.
Engineering & Environmental Services

Date: 09/10/97 6:08 PM

FAX TRANSMITTAL

Number of pages including cover sheet: 3

To:	Thomas Peacock ACDEH
Fax:	510-337-9335
Subject:	Excavation Backfilling Former Cox Cadillac 230 Bay Place Oakland, California

From: PES Environmental, Inc.
1682 Novato Blvd., Suite 100
Novato, California 94947

Phone: (415) 899-1600

Fax Phone: (415) 899-1601

Sent By: Will Mast

PES Project: 167.0201.002

Hardcopy to follow: Yes No

<input type="checkbox"/> Urgent	<input checked="" type="checkbox"/> For your review	<input type="checkbox"/> Reply ASAP	<input type="checkbox"/> Please Comment
---------------------------------	---	-------------------------------------	---

REMARKS:

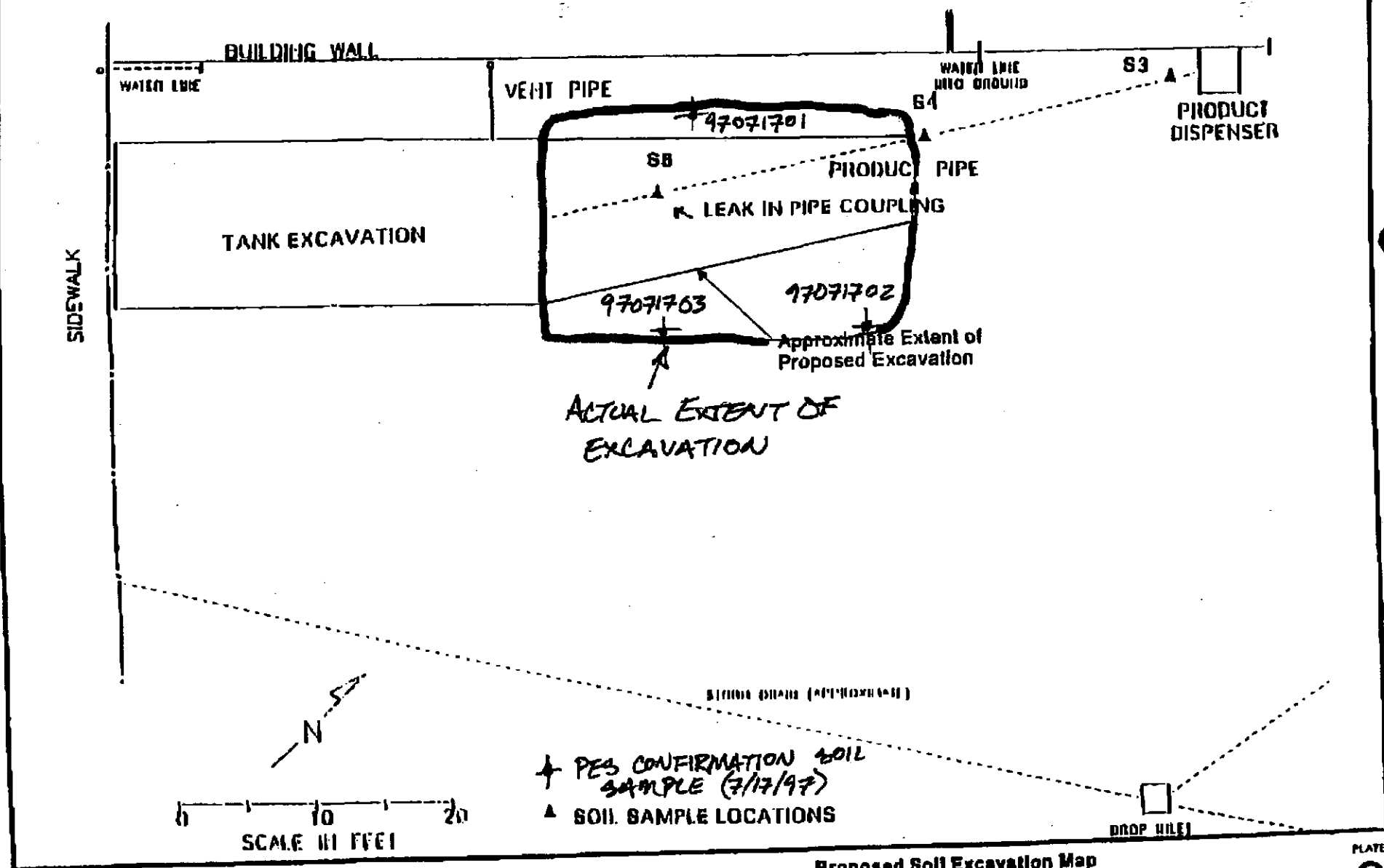
Here is the data for the subject site that we discussed briefly last week. This excavation was originally proposed in PES' *Revised Interim Remedial Action Plan* and subsequent addendum, dated October 31 and November 26, 1996, respectively. We would like to gain ACDEH concurrence that all concentrations of petroleum hydrocarbons in soils above the water table and above the RBSL of 16 µg/kg have been removed, and backfilling the excavation can proceed. We propose to use the clean overburden (as shown by Sample No. 97071705) as part of the backfilling material, with the remainder consisting of clean, imported fill. The TPH-affected overburden will be hauled offsite for recycling, as previously described.

I will call you in the next few days to discuss excavation and backfilling issues.

If this transmittal has been received in error, please contact

PES ENVIRONMENTAL, INC.

at your earliest convenience (415) 899-1600.



PES Environmental, Inc.
Engineering & Environmental Services

Proposed Soil Excavation Map
Cox Cadillac
230 Bay Place
Oakland, California

PLATE
3

**Table 1. Soil Sample Analytical Results
Interim Remedial Actions
Former Cox Cadillac, 230 Bay Place
Oakland, California**

Sample Number	Sample Location	Sample Depth (feet bgs)	TPHg (mg/kg)	Benzene (µg/kg)	Toluene (µg/kg)	Ethyl-benzene (µg/kg)	Total Xylenes (µg/kg)	MTBE (µg/kg)
97071701	North wall	2.5	<1	<5	<5	<5	<5	<50
97071702	South wall	2.5	<1	9	<5	<5	13	<50
97071703	South wall	2.5	<1	<5	<5	<5	<5	<50
97071704	Soil stockpile	NA	32	290	1,200	580	3,100	<50
97071705	Clean overburden stockpile	NA	<1	<5	<5	<5	<5	<50

Notes:

Samples collected on July 17, 1997, by PES.

mg/kg = Milligrams per kilogram; equivalent to parts per million.

µg/kg = Micrograms per kilogram; equivalent to parts per billion.

<5 = not detected at or above the laboratory reporting limit indicated.

NA = Not applicable.



Ca/EPA

**State Water
Resources
Control Board**

Division of
Clean Water
Programs

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-0746
FAX (916) 227-4530

World Wide Web
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

July 1, 1997

Bill Cox Cadillac-Buick
232 14th St E
San Leandro, CA 94577



Pete Wilson
Governor

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 11577,
SITE ADDRESS: 230 BAY PL, OAKLAND, CA 94612**

I have reviewed your request, received on June 24, 1997, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective actions costs. Also, there appears to be a duplicate claim with the USTCF (Claim 8721) and eligible costs incurred for this claim (waste oil UST) must be clearly separated from Claim 8721 (gasoline UST). This should avoid any reimbursement request delays requesting supplemental information and cost allocations.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the PES Environmental, Inc. workplan approved by the Alameda County EHD (County) is **\$2,515**; see the table below for a breakdown of costs. (Since you have not received your Letter of Commitment, the total amount eligible for reimbursement for work at your site that has been directed and approved by the County is \$0.)

Be aware that this pre-approval does not constitute a decision on reimbursement: all reasonable and necessary corrective action costs for work directed and approved by the County will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.

***All future costs for corrective action must be approved in writing by Fund staff.
Future costs for corrective action must meet the requirements of
Article 11, Chapter 16, Underground Storage Tank Regulations.***

COST PRE-APPROVAL BREAKDOWN

Task	Amount Pre-Approved	Comments
Site Characterization and Downgradient Well Installation & Development	\$2,515	Fund approved \$7,527 on 3/28/97; however, additional costs of \$2,515 are expected to be incurred due to concrete coring inside building. Labor (\$920), Drilling (\$555) and Concrete Coring (\$1,040).
TOTAL PRE-APPROVED	\$2,515	

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- It is my opinion that it is unnecessary to obtain three bids for this scope of work; the Fund's three bid requirement is waived for this scope of work.
- If a different scope of work becomes necessary, then you must request pre-approval of costs for the new scope of work.



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

- Although I have referred to the PES Environmental, Inc. proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated June 20, 1997 by PES Environmental, Inc. for conducting the work approved by the County.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary corrective action work. The legislation governing the Fund requires that the Fund assist you in procuring contractor and consultant services for corrective action. If you need assistance in contracting for corrective action services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *To make this easier, insure that your consultant prepares his invoices to match the format of the original estimate, and provides reasonable explanations for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- subcontractor invoices,
- technical reports, when available, and
- applicable correspondence from the County.

Please call if you have any questions; I can be reached at (916) 227-0746.

Sincerely,

ORIGINAL SIGNED BY

Steve Marquez, Water Resources Control Engineer
 Technical Review Unit
 Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Dale Klettke
 Alameda County EHD
 1131 Harbor Bay Pkway, 2nd Fl.
 Alameda, CA 94502-6577

Mr. Will Mast
 PES Environmental
 1682 Novato Blvd, Suite 100
 Novato, CA 94947

bcc: Claim No. 8721

ENVIRONMENTAL PROTECTION

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June 20, 1997

167.0201.004

California UST Cleanup Fund
2014 T Street
Sacramento, California 94244-2120

Attention: Mr. Steven Marquez

LETTER

**CALIFORNIA UNDERGROUND STORAGE TANK CLEANUP FUND
COST PRE-APPROVAL REQUEST FOR INCREASED LEVEL OF EFFORT
INTERIM REMEDIAL ACTIONS
FORMER BILL COX CADILLAC FACILITY
230 BAY STREET
OAKLAND, CALIFORNIA**

Dear Mr. Marquez:

On behalf of Bill Cox and Wells Fargo Bank, PES Environmental, Inc. (PES) has prepared this letter to notify the Underground Storage Tank Cleanup Fund (Fund) of the need for an increased level of effort to perform the previously approved scope of soil and groundwater characterization activities at the subject property. The scope of work is described in the PES letter *California Underground Storage Tank Cleanup Fund Cost Pre-Approval Request, Interim Remedial Actions, Former Bill Cox Cadillac Facility, 230 Bay Street, Oakland, California*, dated December 13, 1996. The Fund granted pre-approval of the cost estimate to perform the scope of work in a letter dated March 28, 1997.

On June 9, 1997, PES began implementation of the characterization portion of the approved scope. This task consisted of using direct-push technology to collect soil and groundwater samples at three locations - two inside of the former showroom and one outside the building. PES was successful in sampling at the outside location. Inside the former showroom, a buried concrete slab was encountered at a depth of 2 feet below ground surface that could not be penetrated by the drilling subcontractor. The two proposed interior locations were attempted, as well as a third interior location. Because of the location of the former tank, the distribution of data from previous investigations, the presence of utility lines, and the constraints of the building, we have not identified suitable alternative sampling locations that would achieve the goals of the sampling program and avoid drilling inside the building.

Mr. Steve Marquez
June 20, 1997
Page 2

PES believes that completion of the scope of work is possible with a small increased level of effort. We propose to core the floor of the showroom at the two proposed sampling locations, remove the soil from the core hole, and then core through the buried slab. This would allow the direct-push sampling to proceed as originally intended. For this cost estimate, we have assumed that the buried slab is 12 inches thick. Table 1 presents the costs approved by the Fund, costs incurred to date, and estimated additional cost to complete the scope of work. Because one of the proposed monitoring wells will be installed inside the showroom, we have included in this estimate the cost to perform concrete coring of the buried slab during that portion of the field program.

In telephone conversations on June 9 and 19, 1997, we discussed with you the drilling conditions and the resulting need for an increased level effort. You stated that given the small change of scope, your review of this request would likely require just a few days. You also stated that we could expect a reply from the Fund in time to perform the rescheduled interior work, currently planned for July 1, 1997.

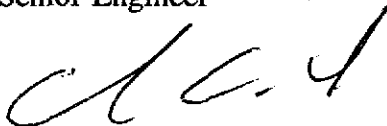
If you have any questions regarding this application or its contents, please do not hesitate to call me at (415) 899-1600.

Yours very truly,

PES ENVIRONMENTAL, INC.



William W. Mast, R.G.
Senior Engineer



Andrew A. Briefer, P.E.
Associate Engineer

Attachment: Table 1

cc: Leah Goldberg, Esq., Hanson, Bridgett, Marcus, Vlahos & Rudy
Mr. Steven Schulman, Wells Fargo Bank
Dale Klettke, ACDEH
Bill Cox, Cox Cadillac
Don Eisenberg, EOA, Inc.

**Table 1. Revised Cost Estimate
Soil and Groundwater Remediation
Former Bill Cox Cadillac
230 Bay Street
Oakland, California**

Task	Approved by Fund	Actual Cost To Date	Estimated Cost To Complete	Estimated Total Cost
TASK 4 - Site Characterization and Downgradient Well Installation & Development				
PES Labor and Materials	\$3,220.00	\$1,440.00	\$2,700.00	\$4,140.00
<u>Subcontractor Labor⁽¹⁾</u>	\$4,307.00	\$1,125.00	\$4,777.00	\$5,902.00
- Drilling (3 direct push borings 8 feet deep & 2 monitoring wells 20 feet deep)	\$3,255.00	\$1,010.00	\$2,800.00	\$3,810.00
- Laboratory analyses (8 8015/8020/MTBE analyses @ \$57.50 per analysis)	\$460.00	\$115.00	\$345.00	\$460.00
- Concrete coring	\$0.00	\$0.00	\$1,040.00	\$1,040.00
- Well development	\$592.00	\$0.00	\$592.00	\$592.00
TASK 4 Subtotal	\$7,527.00	\$2,565.00	\$7,477.00	\$10,042.00



ENVIRONMENTAL
PROTECTION

March 21, 1997

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167.0200.003

California UST Cleanup Fund
2014 T Street
Sacramento, California 94244-2120

STID # 494

Attention: Mr. Christopher Stevens

**CALIFORNIA UNDERGROUND STORAGE TANK CLEANUP FUND
REVISED COST PRE-APPROVAL REQUEST
INTERIM REMEDIAL ACTIONS
FORMER BILL COX CADILLAC FACILITY
230 BAY STREET
OAKLAND, CALIFORNIA**

Dear Mr. Stevens:

On behalf of Bill Cox and Wells Fargo Bank, PES Environmental, Inc. (PES) has prepared this letter revised request for pre-approval of costs (Claim No. 11577) from the California Underground Storage Tank Cleanup Fund. The purpose of this letter is to revise a previous request for pre-approval of costs associated with the proposed remedial activities of gasoline-affected soil and groundwater resulting from a former 10,000-gallon underground gasoline tank operated by Cox Cadillac. This revised cost pre-approval request has been modified to provide clarification of the cost pre-approval submitted to you on December 13, 1996 and to reflect reduction of management and regulatory negotiation fee estimates. Additionally, this revised request provides additional supporting detail regarding costs for the approved scope of work.

This cost pre-approval request is for a scope of work to remediate the affected soil and groundwater at a high risk site using methods which represent significant cost reductions relative to other commonly implemented remediation techniques such as groundwater extraction and treatment.

COST REVISIONS

The December 13, 1996 cost pre-approval request included cost estimates for six tasks. Costs for these tasks were partially approved in your January 31, 1997 letter to Steven Schulman of Wells Fargo Bank. This section describes the differences between the December 13 requested amounts, the January 31 approved amounts and presents the revised cost pre-approval request and supporting rationale for each of the six tasks.

Mr. Christopher Stevens
March 21, 1997
Page 2

Task 1 - Project Planning

An amount of \$3,995 was previously requested for project planning activities. This request included \$3,600 in labor and \$395 in permit fees. The January 31 letter approved \$1695. The costs associated with this task include the costs already incurred for preparation of the Work Plan, including \$1,800 for preparation of the October 31, 1996 Revised Interim Remedial Action Plan and the November 26, 1996 Addendum to the Revised Interim Remedial Action Plan. The estimated cost also included negotiations with the Alameda County Department of Environmental Health to develop the approved scope of work. The estimated costs associated with this task also include preparation of a site safety plan including both hazards associated with drilling and construction work on a contaminated site as well as the hazards associated with the handling of the chemicals required for the bioremediation program.

PES understands that costs associated with gaining approval of costs from the UST Fund are not reimbursable. These constituted \$1,500 of the prior requested funds. PES is therefore, submitting a revised request for pre-approval of this task for \$2,495.

Task 2 - Soil Remediation

An amount of \$15,157 was previously requested for pre-approval. This request included \$3,500 in direct labor and \$11,657 in subcontractor fees and mark-up. A total cost of \$11,704 was approved. The requested cost included coordination and supervision of four separate subcontractors as well as collection and analyses of confirmation soil samples. Based on the contractor estimates, a total of two 10 hour days of field work are required to complete the scope of work. This includes one day to mobilize, sawcut and remove pavement and construct the stockpile area, and to perform the soil excavation, stockpiling and verification sampling; and one day to perform the backfill and compaction, and to replace the pavement, clean up the site, secure the stockpiles and demobilize from the site. Assuming four hours of additional labor is required prior to field mobilization and four hours is required to perform the verification sampling, complete field documentation and sample control documents and two hours for reviewing and verifying subcontractor invoices and contract compliance and project management, 30 hours of PES labor are required to perform the soil remediation. PES equipment and materials costs for this task are approximately \$400. Assuming UST Fund Cost Guideline billing rates of \$65 per hour for staff professionals and \$90 per hour for senior professionals, \$2,400 are appropriate direct labor expenses.

The approved cost denied the request for \$1,000 of mark-up (15 percent) on subcontractor services because evidence of a contractor's license was not provided. PES maintains California State Contractor's license and is therefore, entitled to mark-up on the subcontractor services. A copy of PES' contractor's license is attached.

Mr. Christopher Stevens

March 21, 1997

Page 3

PES understands that the costs associated with gaining approval of costs from the UST fund are not reimbursable. These constituted \$1,100 of the prior requested funds. PES is therefore, submitting a revised request for pre-approval of this task for \$14,057.

Task 3 - Nutrient Introduction

The approved cost of \$13,500 is sufficient to complete this task.

Task 4 - Site Characterization and Well Installation

An amount of \$8,627 was previously requested for pre-approval of site characterization costs. This request included \$4,320 in direct labor and \$4,307 in subcontractor fees and mark-up. A total cost of \$5,607 was approved. The requested cost included scheduling, coordination and supervision of three separate subcontractors as well as collection and analyses of soil samples. Based on the contractor estimates, a total of three 10 hour days of field work are required to complete the scope of work. This includes two days to mobilize, perform the drilling and soil sampling, and well installation, and one day to develop the wells. Assuming four hours of labor are required for preparation and coordination prior to field mobilization and three hours are required to complete field documentation and sample control documents and two hours to review and verify subcontractor invoices and contract compliance and project management, 39 hours of PES labor are required to perform the soil remediation. PES equipment and materials costs for this task are approximately \$600. Assuming UST Fund Cost Guideline billing rates of \$65 per hour for staff professionals and \$90 per hour for senior professionals, \$3,220 are appropriate direct labor expenses.

The approved cost was sufficient to address the subcontractor services.

PES understands that the costs associated with gaining approval of costs from the UST fund are not reimbursable. These constituted \$1,100 of the prior requested funds. PES is therefore, submitting a revised request for pre-approval of this task for \$7,527.

Task 5 - Quarterly Groundwater Monitoring and Bioremediation Progress Evaluation

The approved cost of \$6,659 is sufficient to complete this task

Task 6 - Reporting

An amount of \$14,300 was previously requested for reporting. The January 31, 1997 letter approved \$8,600. The costs associated with this task include preparation of a site characterization report, three quarterly monitoring reports and a year end summary report. It is PES' opinion that the approved costs significantly underrepresent the level of effort required for reporting. In particular, the quarterly monitoring and year end evaluation report costs

Mr. Christopher Stevens

March 21, 1997

Page 4

were approved for \$800 each quarter and \$3,000 for the end of year report. These reports are intended to be elements of the ongoing bioremediation program. They are intended to present the water level and groundwater quality data typical of "standard" monitoring reports. However, they are also intended to include data regarding the quantities and rates of nutrient introduction, bioremediation progress monitoring results such as dissolved oxygen and interpretation of the data to evaluate whether the bioremediation program requires adjustment. PES had intended these reports to document and present the rationale for adjusting the bioremediation program throughout the year to maximize the rate of treatment and shorten the ultimate project length. In particular, the data were intended to be evaluated to assess what the optimum quantities and rates of nutrient introduction are, and to which wells to optimize the system performance. Should the UST Fund wish to reduce the reporting efforts, these evaluations can be deferred to the end of the program. It is PES' opinion that the costs associated with making real time evaluations and adjustments to the program will result in a more rapid completion of the project and lower overall project costs.

PES understands that costs associated with gaining approval of costs from the UST Fund are not reimbursable. These constituted \$1,100 of the prior requested funds. PES is therefore, submitting a revised request for pre-approval of the reporting for this task of \$13,200.

Based on the revised costs presented above, PES is reducing the total amount of this pre-approval request from \$64,158 to \$57,438.

This revised cost pre-approval request is intended to amend the Cost Pre-approval request dated December 13, 1996. The following supporting documentation has been enclosed:

- A copy of PES' California Contractor's license; and
- A revised Cost estimate for the soil and groundwater remediation (Appendix D).

It is PES' opinion that the project approach and costs presented above represent a cost-effective and efficient use of resources to effect a timely reduction in current risks at the site. Furthermore, the approach presented represents the most cost-effective approach to remediation of the site. Other alternatives commonly qualifying for UST Fund approval would be significantly more costly to apply at this site and likely less effective. PES therefore, respectfully requests that your pre-approval letter of January 31, 1997 be amended to reflect the reasonable costs presented above.

Mr. Christopher Stevens

March 21, 1997

Page 5

If you have any questions regarding this application or its contents, please do not hesitate to call me at (415) 899-1600.

Yours very truly,

PES ENVIRONMENTAL, INC.



Andrew A. Briefer, P.E.

Associate Engineer

Enclosures: Appendix D - Revised Cost Estimate - Soil and Groundwater Remediation
PES California State Contractor's License

cc: Leah Goldberg, Esq., Hanson, Bridgett, Marcus, Vlahos & Rudy
Mr. Steven Schulman, Wells Fargo Bank
Dale Klettke, ACDEH
Bill Cox, Cox Cadillac
Don Eisenberg, EOA, Inc.

**Table D-1. Revised Cost Estimate
Soil and Groundwater Remediation
Former Bill Cox Cadillac
230 Bay Street
Oakland, California**

Task	Cost
TASK 1 - Project Planning	
PES Labor	\$2,100.00
Permitting	\$395.00
TASK 1 Subtotal	\$2,495.00
TASK 2 - Soil Remediation	
PES Labor and Materials	\$2,400.00
<u>Subcontractor Labor⁽¹⁾</u>	\$11,657.00
- Mob/demob	\$300.00
- Sawcut asphaltic concrete (A/C) (75 linear feet)	\$259.00
- Remove and dispose of A/C (243 square feet)	\$350.00
- Excavate hydrocarbon-affected soils beneath former piping. (55 cubic yards)	\$1,955.00
- Confirmation soil sample analyses (6 samples @ \$63.25 per analysis)	\$380.00
- Backfilling and soil compaction (includes delivery, clean fill, backfilling, and compaction)	\$3,071.00
- Soil compaction testing (includes proctor test, and two relative density tests per lift of backfilled material @ \$79/hr)	\$600.00
- Replace A/C (243 square feet)	\$912.00
- Misc. equipment and supplies	\$230.00
- Soil loading, transportation and recycling	\$3,600.00
TASK 2 Subtotal	\$14,057.00
TASK 3 - Nutrient Introduction (8 events)	
PES Labor	\$750/event
Materials and Equipment	\$7,500.00
TASK 3 Subtotal	\$13,500.00

**Table D-1. Revised Cost Estimate
Soil and Groundwater Remediation
Former Bill Cox Cadillac
230 Bay Street
Oakland, California**

Task	Cost
TASK 4 - Site Characterization and Downgradient Well Installation & Development	
PES Labor and Materials	\$3,220.00
<u>Subcontractor Labor⁽¹⁾</u>	\$4,307.00
- Drilling (3 direct push borings 8 feet deep & 2 monitoring wells 20 feet deep)	\$3,255.00
- Laboratory analyses (8 8015/8020/MTBE analyses @ \$57.50 per analysis)	\$460.00
- Well development	\$592.00
TASK 4 Subtotal	\$7,527.00
TASK 5 - Quarterly Groundwater Monitoring (5 quarters)	
PES Labor (First Quarter Only)	\$650.00
	\$650.00
<u>Subcontractor Labor⁽¹⁾</u>	\$6,009.00
- Well sampling (7 monitoring wells)	\$3,996.00
- Laboratory analyses (35 8015/8020/MTBE analyses @ \$57.50 per analysis)	\$2,013.00
TASK 5 Subtotal	\$6,659.00
TASK 6 - Reporting	
PES Labor	\$13,200.00
- Site characterization report	\$3,845
- Quarterly performance evaluation & monitoring report (3 Quarters)	\$1,823/Qtr
- Year-end evaluation report	\$3,886
TASK 6 Subtotal	\$13,200.00
TOTAL COST	\$57,438.00

Notes

(1) = All subcontractor line items include 15% mark-up.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



STID 494

November 27, 1996

Bill Cox Cadillac
ATTN: Bill Cox
232 East 14th Street
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P. O. Box 63700
San Francisco, CA 94163

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

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the November 26, 1996 PES Environmental, Inc., (PES) "Addendum to Revised Interim Remedial Action Plan".

This work plan is approved. Please submit a minimum of three bids for proposed work for pre-approval to Christopher Stevens of the State Water Resources Control Board. Recent changes in the legislation governing the UST Fund require that the UST Fund provide you with assistance in procuring contractor and consultant services for the implementation of the corrective action plan. Mr. Steven's direct line at the UST Fund in Sacramento is (916)227-4519.

Please submit for pre-approval a minimum of three bids for the approved SCI work plan to Christopher Stevens of the UST Fund, within 15 days of the date of this letter, or no later than December 13, 1996.

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,

Dale Klettke, CHMM
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947
Leah S. Goldberg, c/o Hanson, Bridgett, Marcus, Vlahos & Rudy, LLP, 333 Market Street Suite 2300, San Francisco, CA 94105-2173
Jeri Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland, CA 94607
Dale Klettke--files



November 15, 1996

167.0200.001

Mr. Steven Schulman
Wells Fargo Bank
c/o Rory Campbell, Esq.
Hanson, Bridgett, Marcus, Vlahos, & Rudy
333 Market Street, Suite 2300
San Francisco, California 94105-2173

ENVIRONMENTAL
PROTECTION

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**RESPONSE TO EOA, INC.'S COMMENTS
REVISED INTERIM REMEDIAL ACTION PLAN
FORMER BILL COX CADILLAC FACILITY
230 BAY STREET
OAKLAND, CALIFORNIA**

Dear Messrs. Campbell and Schulman:

PES Environmental, Inc. (PES) submits this letter to Wells Fargo Bank (Wells Fargo) and Hanson, Bridgett, Marcus, Vlahos & Rudy (Hanson Bridgett) in response to EOA, Inc. (EOA) letter dated November 5, 1996. EOA's November 5, 1996 letter provided commentary on PES' technical approach, narrative and organization presented in *Revised Interim Remedial Action Plan* (Revised IRAP) dated October 31, 1996, prepared for the former Bill Cox Cadillac facility at 230 Bay Street, Oakland, California. The *Revised Interim Remedial Action Plan* was requested by Mr. Dale Klettke of Alameda County Department of Environmental Health Services (ACDEH) in a letter to Leah Goldberg, Esq. of Hanson Bridgett dated October 24, 1996.

The following presents PES' response to the specific comments on the technical approach presented by EOA in their November 5, 1996 letter.

1. *The proposed area for soil excavation is almost entirely within the area that was already excavated and refilled with clean fill. There would be almost no additional benefit from re-excavating only the proposed area. As documented in our report on the previous excavation, there was significant pollution in soil between about 4 and 6 feet bgs at the northeast end of the trench. The additional excavation proposed in the approved workplan was intended to remove that additional soil pollution, and to determine its extent in the northeast and easterly directions. The proposed plan should be corrected to include excavation in an area similar to that shown in Plate 3 of the approved workplan. It should also acknowledge, as in the approved plan, that the lateral boundaries will be extended if significant soil pollution is determined to be present beyond the planned boundaries, as determined by confirmatory sampling prior to completely backfilling the excavation.*

Messrs. Campbell and Schulman

November 15, 1996

Page 2

Four of the five sidewall samples collected and analyzed by EOA from the pipeline excavation contained detected benzene concentrations in excess of the Risk-Based Corrective Action (RBCA) Tier 1 Risk-Based Screening Levels (RBSL) for benzene (EOA, 1996b). Results of the previous verification sampling results were shown in Figure 11 of EOA's Corrective Action Plan Development Report, Phase I (EOA, 1996b). The excavation proposed by PES would remove soil containing benzene concentrations in excess of the RBSL for benzene, as determined by EOA. EOA states that significant pollution in soil is present in the northeast end of the trench between about 4 and 6 feet below ground surface (bgs). However, soil analytical results from samples collected beneath the former piping did not indicate significant soil contamination at sample location S4, approximately 27 feet northeast of the former UST excavation (EOA, 1994). Based on EOA's verification sampling results, soil excavation conducted to the northeast of sample number S4 does not appear to be warranted. PES' proposed excavation was designed to address the residual contamination identified during EOA's previous sampling efforts without undermining the structural integrity of the building. The excavation area does encompass the portion of the pipeline which was formerly excavated and PES recommends that the excavation be conducted so as to minimize the amount of clean backfill removed from the previously excavated area. The east and northeast lateral boundaries of the excavation will be extended if significant concentrations of contaminants of concern are detected during excavation or confirmation sampling.

2. *The boring and temporary well inside the building near the pipe leak location, which are shown in Plate 3 of the approved work plan, need to be included also in the revised plan. Their purpose is to support the decision to not perform excavation under the building foundation in this vicinity, by providing additional information for risk evaluation and geotechnical structural evaluation.*

PES proposed in the Revised IRAP to install and sample two soil borings and one temporary well in the former show room. The purpose of the borings and well are to define the lateral extent of the groundwater contamination and allow an estimate of the mass of hydrocarbons beneath the building to support the interim remedial actions. PES feels that both sets of borings are not required and that PES' proposed borings and temporary well will provide the necessary information for risk and geotechnical structural evaluations.

3. *At the beginning of Section 3.0, the narrative should be modified to make it clear that the owner, and not the County, requested modification of the plan. The proposed alternative method for introducing ORCs and nutrients is approximately equivalent to the previously-approved approach, but we disagree with the implication that the proposed alternative approach is in any way significantly superior to the method described in the approved plan. It is our opinion that neither approach can be predicted a priori to be quicker or more effective than the other. Either one should be*

Messrs. Campbell and Schulman
November 15, 1996
Page 3

considered an interim measure, to be implemented and evaluated while designing and permitting a more active approach. The County has indicated that if the interim measure is effective, the County will review the cost-effectiveness of continuing to require cleanup to the present risk-based cleanup levels. However, if those levels are enforced, it is unlikely that either interim measure will be sufficient to attain those levels site-wide in a reasonable time.

EOA's comment regarding whether modification of the previously submitted plan was requested by the owner or the County is not particularly germane to the resolution of environmental conditions at the property. The issue is whether the proposed approach provides immediate remedial action and improves public health. We note that Mr. Dale Klettke of ACDEH, after consultation with the owners representative, issued an October 24, 1996 letter requesting an interim remedial action plan.

It should be noted that a significant period of time has already elapsed since the discovery of the subsurface contamination. Other than initial source removal, little has been done to date to remedy the groundwater impacts. The current PES proposal results in immediate benefits to water quality, and we believe the proposed alternative represents the best chance for effecting site cleanup as required by the County. The benefit of PES' proposed alternative over the previously approved approach is that more oxygen and nutrients can be added to the groundwater in a shorter time period and the concentrations and volumes adjusted as required to accelerate bioremediation of hydrocarbons. Under the EOA proposed CAP, the introduction of oxygen and nutrients could not be easily supplemented or adjusted to site-specific conditions and changes.

4. *If ORCs and nutrients are introduced through monitoring wells, as proposed in the revised CAP workplan, we feel strongly that they should not be introduced through wells TW-6 and TW-7. These wells presently define the down-gradient and side-gradient extent of characterization of the hydrocarbon plume. Introduction of ORC's [sic] and nutrients in these wells may provide localized improvement of groundwater quality. To the extent that this is successful locally, such success would compromise the capability to use these wells to monitor for overall effectiveness of bioremediation. It is our opinion that these two wells should continue to be monitored quarterly without introduction of any chemicals. If concentrations of hydrocarbons decrease in the downgradient wells without local chemical addition that will provide convincing evidence of effectiveness of bioremediation activity upgradient in the former tank and piping areas. If chemicals are added in these wells also, it will not be possible to interpret the monitoring results with any confidence.*

Messrs. Campbell and Schulman

November 15, 1996

Page 4

If TW-7 is maintained as a monitoring-only well, then there would be no need to install the proposed new monitoring well on the sidewalk near TW-7. That new well could be installed in a more useful location, within the showroom as per the approved workplan, or on the sidewalk next to the showroom, where the proposed workplan shows a soil boring. If the remaining wells (TW-3, TW-4, MW-1, and TW-5) are not sufficient for injection of ORCs then additional injection wells need to be constructed and/or the plan is less feasible than the approved plan.

The focus of PES' proposed approach is on maximization of soil and groundwater remediation and not preserving a particular well for monitoring purposes. The highest concentrations of hydrocarbons in groundwater were detected in groundwater samples collected from wells TW-5 (upgradient of former UST) and TW-7 (downgradient of former UST). Detectable concentrations of hydrocarbons were also encountered in groundwater sampled from well TW-6. Therefore, these wells are not likely to represent the proper location for monitoring the downgradient extent of the plume. The introduction of ORCs and nutrients into areas with high hydrocarbon concentrations will accelerate the remediation process and provide an overall benefit to the remediation program. Furthermore, by not introducing ORCs and nutrients into areas with the highest hydrocarbon concentrations, untreated groundwater may be allowed to migrate offsite. It should also be noted that a new downgradient well would be of benefit to evaluate the downgradient extent of the hydrocarbon-affected groundwater as required by the *Tri-Regional Board Staff Recommendations for Preliminary Investigation and Evaluation of Underground Tank Sites*.

Although the introduction of oxygen and nutrients to monitoring wells will likely affect the concentrations of hydrocarbons detected in subsequent groundwater monitoring events, it by no means renders monitoring data from those wells unusable. Trends of hydrocarbon concentration and dissolved oxygen over time will continue to provide information which is useful in assessing the effectiveness of the remedial program and the general water quality in the vicinity of the well.

The following presents PES' response to the specific comments on the narrative and organization presented by EOA in their November 5, 1996 letter.

1. *In Section 2.0 "Previous Findings", the PES workplan contains several statements which significantly understate the potential that the "former waste oil tank" may have contributed at least some portion of the hydrocarbon pollution that is the subject of this CAP. The workplan states that "analytical data were inconclusive as to the presence of petroleum hydrocarbon compounds" in soil and groundwater at the site. It is our understanding from PES previous reports that only the first report of sampling was inconclusive. There was a confirmed leak in that tank, and subsequently hydrocarbon pollution was confirmed at relatively high concentrations, at least in soil. For that reason the County, in 1988, required installation of monitoring well (MW-1), which*

Messrs. Campbell and Schulman

November 15, 1996

Page 5

was not installed until 1993. As a general comment, it is our opinion that possible soil and groundwater pollution associated with the former waste oil tank has not been adequately documented, and that the regulatory closure status of that tank remains ambiguous.

In December 1988, the waste oil tank was excavated and soil and groundwater samples were collected and analyzed from the excavation. The analytical data were inconclusive as to the presence of petroleum hydrocarbons. The excavated soil was placed back in the excavation. At the request of the ACDEH the soil was re-excavated and subsequently disposed of offsite. In February 1993, groundwater monitoring well MW-1 was installed and the groundwater was sampled. The results of the chemical analyses indicated that the contaminants detected were characterized as unweathered "fresh" gasoline due to the relatively high concentrations of the volatile fraction present in the sample. PES concluded that the chemical fingerprint of the sample was not consistent with a five year old release from a waste oil tank. PES also concluded that the source of the hydrocarbons was either the 10,000-gallon gasoline tank or other possible contributing sources, as evidenced by the existence of wrecked cars with leaking fluids parked near well MW-1, and the deteriorated condition of the asphalt possibly caused by leaking fluids. The presence of "fresh" gasoline constituents is not consistent with a release from a waste oil that was removed in 1988, particularly as Mr. Cox claims he had not used the waste oil tank.

2. *We also feel that it is incorrect to say that "no waste oil constituents were detected in MW-1 [sic]. It is our opinion that the waste oil tank was the most likely source of DCA and soluble lead which were detected in MW-1 and only later spread to the downgradient wells. It is also the case that there is no practical and reliable way to definitively determine that hydrocarbons from waste oil tank leak are not present along with fresh gasoline hydrocarbons in MW-1. The "fuel fingerprint" that was performed for PES on hydrocarbons from MW-1 did not produce a match with the material in the 10,000 gallon fuel tank. This could indicate that material from another source was also present in that sample.*

As stated above, the results of the chemical analysis of groundwater samples from well MW-1 exhibited characteristics indicative of a "fresh" gasoline, not a five year old waste oil tank release. A release from a waste oil tank would be expected to include diesel or motor oil range hydrocarbons and not merely leaded gasoline components. The chemical characteristics of contaminants in the sample from well MW-1 therefore can be explained as being from two or more sources: the primary source being a release from the gasoline tank which provides the samples "fresh" characteristics; and one or more secondary sources such as a surface release of leaded gasoline from parked or wrecked vehicles stored on the lot, which could explain the presence of 1,2-DCA and soluble lead.

Messrs. Campbell and Schulman
November 15, 1996
Page 6

3. *In general, the workplan seems to contain extraneous discussion for purposes which are not clear. For example, the entire Section 3.0 "Evaluation of Remedial Alternatives" should be omitted. It does not add anything to the previous, similar analysis which was carried out in the feasibility screening section of the approved report. If this section is intended to change the conclusions of that report, it needs to be carried out in more depth, and to be made much more clear about what if any changes are proposed. If, as we understand, it is simply proposed to use a different method for injecting ORCs in the interim remediation measure, then additional discussion of remediation alternatives is unnecessary, and in this case, confusing.*

Comment 3 suggests that EOA feels that the Section 3.0 Evaluation of Remedial Alternatives in the Revised IRAP should be omitted. PES was requested to prepare the Revised RAP which is intended to supersede the previously submitted EOA plan. As such, a discussion of remedial alternatives is appropriate as supporting documentation for the chosen interim remedial technology.

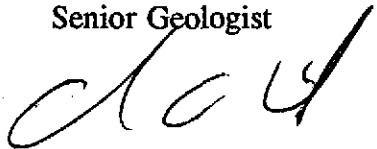
PES trusts this letter responds to the concerns presented in EOA's November 5, 1996 letter. Should you have any questions regarding this letter please call either of the undersigned at (415) 899-1600.

Very truly yours,

PES ENVIRONMENTAL, INC.



Kyle S. Flory, R.G.
Senior Geologist



Andrew A. Briefer, P.E.
Associate Engineer

cc: Dale Klettke, ACDEH
Leah Goldberg, Hanson Bridgett, Marcus, Vlahos & Rudy
Don Eisenberg, EOA

Messrs. Campbell and Schulman
November 15, 1996
Page 7

REFERENCES

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Regional Water Quality Control Board. 1991. *Appendix A-Tri-Regional Board Staff Recommendations for Preliminary Investigation and Evaluation of Underground Tank Sites. August 30, 1991.*

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FACSIMILE TRANSMISSION COVER SHEET

DATE: November 11, 1996 ORIGINAL MAILED: yes
TO: DALE KLETTKE Alameda County
FROM: LEAH S. GOLDBERG
RE: 230 Bay Place, Oakland, CA

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SARAH D. MOTT

November 11, 1996

VIA FACSIMILE AND REGULAR MAIL

Mr. Dale Kletke
ALAMEDA COUNTY ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577

Re: 230 Bay Place, Oakland, California

Dear Dale:

This letter is to update you on the above-referenced site and to request approval of the Interim Remedial Action Plan ("IRAP"). As you will recall, you granted the responsible parties on this site a 15-day extension to submit bids to the State Water Resources Control Board Underground Storage Tank Cleanup Fund for review and pre-approval. In addition, you requested that PES Environmental submit a revised IRAP on or before October 31, 1996.

In your letter requesting the IRAP, you also requested that we submit bids or obtain pre-approval from the UST Fund by November 12, 1996. In order to request pre-approval of the work from the UST Cleanup Fund, we need the County's approval of the IRAP. Without this approval, we cannot proceed.

On October 31, 1996, Andrew Briefer from PES Environmental submitted an IRAP. Prior to faxing the IRAP to you, Mr. Briefer sent a copy to Bill Cox and Don Eisenberg for review. Both men indicated that they would not be able to review the IRAP for a number of days. In order to meet the County's deadline, the IRAP was faxed to you as required on October 31, 1996.

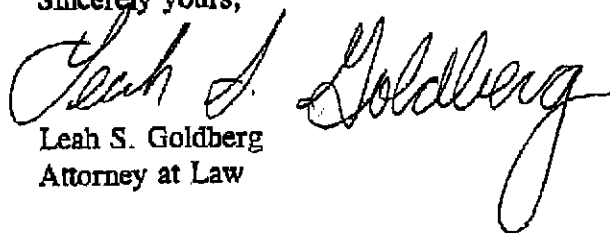
Mr. Dale Kletke
November 11, 1996
Page 2

A week later, on November 6, 1996, we received a copy of a the letter dated November 6, 1996, and sent to you with Mr. Cox's and Mr. Eisenberg's comments on the IRAP. We will respond in writing to those comments and will send you a copy of the response via facsimile tomorrow.

In order to expedite our efforts, would you please review the IRAP and, if acceptable, issue a letter approving it. We will then immediately proceed to get pre-approval from the UST Cleanup Fund for its implementation by PES Environmental. We also respectfully request your approval of another extension to allow you time to review and approve the IRAP and for us to submit it to the UST Cleanup Fund for pre-approval.

Please do not hesitate to call with any questions or comments you may have.

Sincerely yours,



Leah S. Goldberg
Attorney at Law

LSG:cbg

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November 11, 1996

VIA FACSIMILE AND REGULAR MAIL

Mr. Dale Klettke
ALAMEDA COUNTY ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577

Re: 230 Bay Place, Oakland, California

Dear Dale:

This letter is to update you on the above-referenced site and to request approval of the Interim Remedial Action Plan ("IRAP"). As you will recall, you granted the responsible parties on this site a 15-day extension to submit bids to the State Water Resources Control Board Underground Storage Tank Cleanup Fund for review and pre-approval. In addition, you requested that PES Environmental submit a revised IRAP on or before October 31, 1996.

In your letter requesting the IRAP, you also requested that we submit bids or obtain pre-approval from the UST Fund by November 12, 1996. In order to request pre-approval of the work from the UST Cleanup Fund, we need the County's approval of the IRAP. Without this approval, we cannot proceed.

On October 31, 1996, Andrew Briefer from PES Environmental submitted an IRAP. Prior to faxing the IRAP to you, Mr. Briefer sent a copy to Bill Cox and Don Eisenberg for review. Both men indicated that they would not be able to review the IRAP for a number of days. In order to meet the County's deadline, the IRAP was faxed to you as required on October 31, 1996.

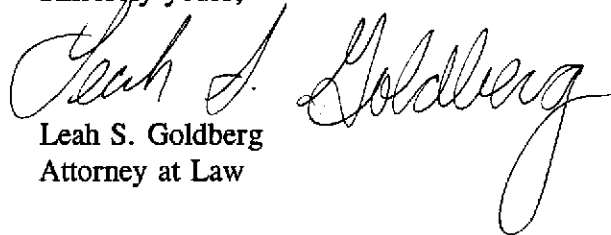
Mr. Dale Klettke
November 11, 1996
Page 2

A week later, on November 6, 1996, we received a copy of a the letter dated November 6, 1996, and sent to you with Mr. Cox's and Mr. Eisenberg's comments on the IRAP. We will respond in writing to those comments and will send you a copy of the response via facsimile tomorrow.

In order to expedite our efforts, would you please review the IRAP and, if acceptable, issue a letter approving it. We will then immediately proceed to get pre-approval from the UST Cleanup Fund for its implementation by PES Environmental. We also respectfully request your approval of another extension to allow you time to review and approve the IRAP and for us to submit it to the UST Cleanup Fund for pre-approval.

Please do not hesitate to call with any questions or comments you may have.

Sincerely yours,


Leah S. Goldberg
Attorney at Law

LSG:cbg

EOA, Inc.

ENVIRONMENTAL
PROTECTION

96 NOV -7 PM 1:49

Eisenberg, Olivieri, & Associates

Environmental and Public Health Engineering

November 6, 1996

Mr. Dale Klettke
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577

Re: 230 Bay Place, Oakland, CA - Comments on PES proposed revised workplan and transmittal of Finalized CAP Conceptual Remedial Design.

Dear Mr. Klettke:

Mr. Cox has requested that I send you a copy of my letter to him which contains EOA's comments on the proposed revised workplan submitted to you by PES for the Shepard Trust, the co-PRPs at this site. The revised workplan was submitted by PES before it was reviewed by EOA or Mr. Cox. Mr. Cox requests that you review these comments before taking any action with respect to the proposed revised CAP.

Also enclosed, for your records, is the finalized (signed and stamped) version of the Corrective Action Plan - Conceptual Remedial Design for the former Cox Cadillac Site at 230 Bay Place in Oakland. This document was submitted by Mr. Cox in draft form on September 6, 1996, and approved by you, without changes, in your letter dated September 26, 1996.

If you have any questions, or wish to discuss this letter, please don't hesitate to call me.

Sincerely,
EOA, Inc.



Don M. Eisenberg, Ph.D., P.E.
Principal Engineer

Attachments:

- 1) Comments on PES proposed revised CAP remediation design
- 2) Finalized copy of original (approved) Conceptual Remedial Design

cc: Bill Cox
Bob Cross
Leah Goldberg Kevin Graves
Andy Briefer Gil Jensen (letter only)

November 5, 1996

Mr. Bill Cox
232 E 14th St.
San Leandro, CA

Re: Review of PES proposed CAP workplan

Dear Mr. Cox:

Per your request, we have reviewed the subject document. We have several technical comments as follows:

Comments on Technical Approach:

✓ 1) The proposed area for soil excavation is almost entirely within the area that was already excavated and refilled with clean fill. There would be almost no additional benefit from re-excavating only the proposed area. As documented in our report on the previous excavation, there was significant pollution in soil between about 4 and 6 feet bgs at the northeast end of the trench. The additional excavation proposed in the approved workplan was intended to remove that additional soil pollution, and to determine its extent in the northeast and easterly directions. The proposed plan should be corrected to include excavation in an area similar to that shown in Plate 3 of the approved workplan. ~~It should also acknowledge, as in the approved plan, that the lateral boundaries will be extended if significant soil pollution is determined to be present beyond the planned boundaries, as determined by confirmatory sampling prior to completely backfilling the excavation.~~

✓ 2) The boring and temporary well inside the building near the pipe leak location, which are shown in Plate 3 of the approved work plan, need to be included also in the revised plan. Their purpose is to support the decision to not perform excavation under the building foundation in this vicinity, by providing additional information for risk evaluation and geotechnical structural evaluation.

3) At the beginning of Section 3.0, the narrative should be modified to make it clear that the owner, and not the County, requested modification of the plan. The proposed alternative method for introducing ORCs and nutrients is approximately equivalent to the previously-approved approach, but we disagree with the implication that the proposed alternative approach is in any way significantly superior to the method described in the approved plan. It is our opinion that neither approach can be predicted a priori to be quicker or more effective than the other. Either one should be considered an interim measure, to be implemented and evaluated while designing and permitting a more active approach. The County has

Mr. Bill Cox
November 5, 1996
Page 2

indicated that if the interim measure is effective, the County will review the cost-effectiveness of continuing to require cleanup to the present risk-based cleanup levels. However, if those levels are enforced, it is unlikely that either interim measure will be sufficient to attain those levels site-wide in a reasonable time.

4) If ORCs and nutrients are introduced through monitoring wells, as proposed in the revised CAP workplan, we feel strongly that they should not be introduced through wells TW-6 and TW-7. These wells presently define the down-gradient and side-gradient extent of characterization of the hydrocarbon plume. Introduction of ORC's and nutrients in these wells may provide localized improvement of groundwater quality. To the extent that this is successful locally, such success would compromise the capability to use these wells to monitor for overall effectiveness of bioremediation. It is our opinion that these two wells should continue to be monitored quarterly without introduction of any chemicals. If concentrations of hydrocarbons decrease in the downgradient wells without local chemical addition that will provide convincing evidence of effectiveness of bioremediation activity upgradient in the former tank and piping areas. If chemicals are added in these wells also, it will not be possible to interpret the monitoring results with any confidence.

If TW-7 is maintained as a monitoring-only well, then there would be no need to install the proposed new monitoring well on the sidewalk near TW-7. That new well could be installed in a more useful location, within the showroom as per the approved workplan, or on the sidewalk next to the showroom, where the proposed workplan shows a soil boring. If the remaining wells (TW-3, TW-4, MW-1, and TW-5) are not sufficient for injection of ORCs then additional injection wells need to be constructed and/or the plan is less feasible than the approved plan.

Comments on Narrative and Organization:

1) In Section 2.0 "Previous Findings", the PES workplan contains several statements which significantly understate the potential that the "former waste oil tank" may have contributed at least some portion of the hydrocarbon pollution that is the subject of this CAP. The workplan states that "analytical data were inconclusive as to the presence of petroleum hydrocarbon compounds" in soil and groundwater at the site. It is our understanding from PES previous reports that only the first report of sampling was inconclusive. There was a confirmed leak in that tank, and subsequently hydrocarbon pollution was confirmed at relatively high concentrations, at least in soil. For that reason the County, in 1988, required installation of monitoring well (MW-1), which was not installed until 1993. As a general comment, it is our opinion that possible soil and groundwater pollution associated with the former waste oil tank has not been adequately documented, and that the regulatory closure status of that tank remains ambiguous.

Mr. Bill Cox
November 5, 1996
Page 3

2) We also feel that it is incorrect to say that "no waste oil constituents were detected in MW-1. It is our opinion that the waste oil tank was the most likely source of DCA and soluble lead which were detected in MW-1 and only later spread to the downgradient wells. It is also the case that there is no practical and reliable way to definitively determine that hydrocarbons from waste oil tank leak are not present along with fresh gasoline hydrocarbons in MW-1. The "fuel fingerprint" that was performed for PES on hydrocarbons from MW-1 did not produce a match with the material in the 10,000 gallon fuel tank. This could indicate that material from another source was also present in that sample.

3) In general, the workplan seems to contain extraneous discussion for purposes which are not clear. For example, the entire Section 3.0 "Evaluation of Remedial Alternatives" should be omitted. It does not add anything to the previous, similar analysis which was carried out in the feasibility screening section of the approved report. If this section is intended to change the conclusions of that report, it needs to be carried out in more depth, and to be made much more clear about what if any changes are proposed. If, as we understand, it is simply proposed to use a different method for injecting ORCs in the interim remediation measure, then additional discussion of remediation alternatives is unnecessary, and in this case, confusing.

The above issues are important, but require only relatively minor modifications of the document. If these comments are adequately addressed, we would see no problem with PES proposing this alternative approach to the County. We would recommend review of a revised version of this workplan before there is any submittal to the County.

If you have questions or wish to discuss this letter, please call me.

Sincerely,
EOA, Inc.



Don M. Eisenberg, Ph.D, P.E.
Principal Engineer

cc: Dale Klettke
Andy Briefer
Bob Cross
Leah Goldberg

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



STID 494

October 24, 1996

Hanson, Bridgett, Marcus, Vlahos & Rudy, LLP
333 Market Street Suite 2300
San Francisco, CA 94105-2173
Attn: Leah S. Goldberg

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Ms. Goldberg:

This office is in receipt of your October 23, 1996 letter, in which you requested a 15 day extension for submittal of a PES Environmental (PES) work plan. As you already are aware, this office has already approved an EOA, Inc., interim remedial action plan, and was requiring that three bids be submitted for pre-approval by Christopher Stevens of the UST Fund, no later than October 28, 1996.

Therefore, this office requests that the following schedule be adhered to for the submittal of the PES work plan, and the submittal of three bids for pre-approval to Christopher Stevens of the UST Fund:

- 1 Submittal of the PES work plan for review by this office, **by October 31, 1996**. Faxed copy of work plan will be sufficient.
- 2 Submittal of three bids for pre-approval by Christopher Stevens of the UST Fund, **no later than November 12, 1996**.

I have been in contact with Andy Briefer of PES Environmental, who will be preparing the interim remedial action plan for the Shephard trust. I have agreed that the work plan can be implemented in two phases, in order to commence excavation activities prior to the rainy season.

- ◆ Phase one will consist of all activities associated with the excavation of petroleum-affected soils in the vadose zone, as referenced in the approved EOA interim remedial action plan.
- ◆ Phase two will consist of implementation of an appropriate oxygen-releasing system, in this case, the controlled introduction of a hydrogen peroxide solution into the existing groundwater monitoring well network.

Recent changes in the legislation governing the UST Fund require that the UST Fund provide you with assistance in procuring contractor and consultant services for the implementation of the corrective action plan. Mr. Steven's direct line at the UST Fund in Sacramento is (916)227-4519.

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

Leah S. Goldberg
RE: 230 Bay Place, Oakland
October 24, 1996
Page 2 of 2

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.

Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947
Jeri Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland, CA 9460
H. W. Shephard, Jr., Wells Fargo Bank Trust, P. O. Box 63700, San Francisco, CA 94163
Bill Cox, 232 East 14th Street, San Leandro, CA 94577
Dale Klettke, LOP Manager--files

BC
0494time.15d

**ALAMEDA COUNTY ENVIRONMENTAL
HEALTH SERVICES**

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

FAX COVER SHEET

DATE: 10/24, 19 96

TO: LEAH GOLDBERG

H, B, M, V, R

FAX # (415) 541 9366

Total number of pages including cover sheet 3

FROM: D. KETTIC

NOTE:

PLEASE RESPOND BY ~~FAX ONLY~~ ⁽⁵¹⁰⁾ 567-6880

HARD COPY TO FOLLOW

(SMILE) HAVE A NICE DAY
DO SOMETHING FOR OUR ENVIRONMENT

LAW OFFICES

HANSON, BRIDGETT, MARCUS, VLAHOS & RUDY, LLP

333 MARKET STREET, SUITE 2300
SAN FRANCISCO, CALIFORNIA 94105-2173
(415) 777-3200
Facsimile (415) 541-9388

FACSIMILE TRANSMISSION COVER SHEET

DATE: October 23, 1996

ORIGINAL MAILED: n/a

TO: DALE KLETTKE

FROM: LEAH S. GOLDBERG

RE:

THE FOLLOWING NOTICE IS APPLICABLE IF THIS BOX IS CHECKED:

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MESSAGE:

RECEIVER'S FAX NO. (510) 337-9335

TOTAL # PAGES, INCLUDING THIS PAGE: 3

CC:

CC FAX NOS.

Please immediately call (415) 777-3200 and ask for fax room if you do not receive all of the transmitted pages.

Transmission is via: Automatic X

File No. 8283.1

LAW OFFICES
HANSON, BRIDGETT, MARCUS, VLAHOS & RUDY, LLP

333 MARKET STREET, SUITE 2300
 SAN FRANCISCO, CALIFORNIA 94105-2173
 (415) 777-3200

RAYMOND L. HANSON
 (1912-1990)
 JOHN J. VLAHOS
 WILLIAM J. BUSH
 RICHARD N. RAPOPORT
 LAURENCE W. KESSENICK
 DOUGLAS H. BARTON
 JAMES O. HOLDEN
 MICHAEL A. DUNCHEON
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 CRAIG J. CANNIZZO
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 STEPHEN L. TABER
 STEPHEN B. PECK
 KIM T. SCHOKNECHT
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 SUSAN G. O'NEILL
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 LISA K. FUNTILLO
 ERIC V. TAO
 GLENDA M. ZARBOCK
 LEAH GOLDBERG

FACSIMILE (415) 541-0366

OF COUNSEL
 JACK P. WONG
 DANIEL W. BAKER
 ROBERT E. SIMMS
 JOHN W. BROAD
 SARAH D. MOTT

October 23, 1996

VIA FACSIMILE

Dale Klettke, CHMM
 Alameda County, Environmental Health Services
 1131 Harbor Bay Parkway
 No. 250
 Alameda, CA 94502-6577

Re: 230 Bay Place, Oakland, California

Dear Dale:

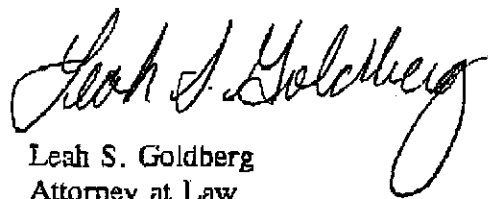
It was a pleasure speaking with you this afternoon about the above referenced site. As I explained, the responsible parties on this site are working on an agreement to facilitate the management of the site investigation and remediation necessary to obtain closure.

The parties are in receipt of your September 26, 1996 letter requesting that three bids be submitted to Christopher Stevens at the UST Cleanup Fund for pre-approval by October 28, 1996. Because the parties are in the process of ameliorating the management of the site investigation and remediation, we hereby request a 15-day extension until November 12, 1996. By that date, PES Environmental will submit a Revised Remedial Action Plan pursuant to your telephone conversation with Andy Briefer. Once this Revised Remedial Action Plan is approved, we will work with the UST Cleanup Fund to obtain pre-approval to expedite the work contemplated under the Revised Remedial Action Plan. We recognize that there is an urgency to commencing any necessary excavation prior to the rainy season.

Dale Klettke, CHMM
October 23, 1996
Page 2

If this short extension of time is acceptable to you, please respond at your earliest convenience in writing. Should you have any questions or comments, please do not hesitate to call.

Sincerely yours,



Leah S. Goldberg
Attorney at Law

LSG:pg

cc: Don Eisenberg, EOA, Inc.
Robert Cross, Esq.
Andy Briefer, PES Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

STID 494

September 26, 1996

Bill Cox Cadillac
ATTN: Bill Cox
232 East 14th Street
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P. O. Box 63700
San Francisco, CA 94163

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

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the September 5, 1996 Subsurface Consultants, Inc., (SCI) "Corrective Action Plan Conceptual Remedial Design".

This work plan is approved. Please submit a minimum of three bids for proposed work for pre-approval to Christopher Stevens of the State Water Resources Control Board. Recent changes in the legislation governing the UST Fund require that the UST Fund provide you with assistance in procuring contractor and consultant services for the implementation of the corrective action plan. Mr. Steven's direct line at the UST Fund in Sacramento is (916)227-4519.

Please submit for pre-approval a minimum of three bids for the approved SCI work plan to Christopher Stevens of the UST Fund, within 30 days of the date of this letter, or no later than October 28, 1996.

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,

Dale Klettke, CHMM
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947
Jeri Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland, CA 94607
Thomas Peacock, LOP Manager--files

**ALAMEDA COUNTY ENVIRONMENTAL
HEALTH SERVICES**

**ENVIRONMENTAL PROTECTION DIVISION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
Telephone (510) 567-8700 Fax (510) 337-9335**

FAX COVER SHEET

DATE: 10/23, 19 96

TO: CEAH GOLDBERG

H, B, M, V & R

FAX # (415) 541-9366

Total number of pages including cover sheet 2

FROM: DAVE KUETIK

NOTE:

PLEASE RESPOND BY ~~FAX ONLY.~~ (510) 567-6880

(SMILE) HAVE A NICE DAY
DO SOMETHING FOR OUR ENVIRONMENT

EOA, Inc.

Eisenberg, Olivieri, & Associates
Environmental and Public Health Engineering

September 12, 1996

STID
494

Mr. Dale Klettke
Alameda County Health Care Services Agency
Department of Environmental Health
1731 Harbor Bay Parkway
Alameda, CA 94502

**SUBJECT: July 1996 Quarterly Monitoring Report
Cox Cadillac, 230 Bay Place, Oakland, California**

Dear Mr. Klettke:

Enclosed is one copy of the "July 1996 Quarterly Monitoring Report" for the Cox Cadillac, 230 Bay Place, Oakland, California site. Monitoring activities included measuring depth to groundwater and sampling groundwater for analyses. The monitoring is a continuation of quarterly monitoring that was begun in December 1994 and follows the same methodology, with the exception that depth to groundwater is measured on a quarterly instead of monthly basis. In addition, at your request, we have added groundwater analysis for methyl tertiary butyl ether.

Please call me if you have any questions regarding the report.

Sincerely,



Don Eisenberg, Ph.D., P.E.
President,

Attachment

cc: Andy Briefer, PES
Rory Campbell



CalVEPA

State Water
Resources
Control Board

Division of
Clean Water
Programs

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244 2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4307
FAX (916) 227-4530



Pete Wilson
Governor

FAX TRANSMITTAL

DATE: 8-15-96

TO: Dale Klette

FAX #: (510) 337-9335

FROM: Cheryl Gordon

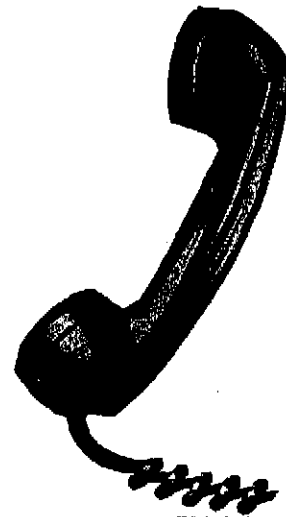
UST CLEANUP FUND PROGRAM

FAX #: (916) 227-4530

PHONE #: (916) 227-4639

NUMBER OF PAGES (including this page): _____

- For your information
- Per your request
- For your review and comment
-



DETAILED REVIEW CHECK LIST

Page 2

Claim No: 11577	Claimant Name: Harold Shepard Trust
-----------------	-------------------------------------

PRIORITY DESIGNATION	VERIFICATION	N/A	YES	NO	
Priority Class A - Home Heating Oil	/				
Small Home Heating Oil Tank					
Residence owner-occupied/Single Family					
Tank capacity 1,100 gallons or less					
Not used for agricultural after 1/1/85					
Not a Farm Tank - No Permit Required					
Priority Class A Petroleum					
Site used exclusively for residential					
Residence owner-occupied/Single Family					
Residence owner-occupied by Claimant					
Not a Farm Tank - Permit Required					
Priority Class B - Small Business					
Financial Review Approval		Tax Review			
Priority Class B - Gov Entity/Non-Profit					
City, County, District, Non-Profit					
Financial Review Approval					
Priority Class C - Other Business					
Number of Employees Less Than 500					
Priority Class C - Gov Entity/Non-Profit					
City, County, District, Non-Profit					
Number of Employees Less Than 500					
Priority Class D - All Others					

ISSUES AND COMMENTS:

- There was

Mineral Spirits Tank has received closure - no contamination.

Waste Oil Tank is still under investigation.

Dates

Summary of Groundwater Analytical Results

Installed 2/93	MW-1	6 gtes	TW-6	5 gtes	} installed 10/93
	TW-1	1 gtr	TW-7	5 gtes	
Installed 10/93	TW-2	1 gtr			
	TW-3	1 gtr			
	TW-4	1 gtr			
	TW-5	1 gtr			

Consultant for Shepard Trust - PES Environmental
Andy Prieter

Consultant for Bill Cox Cadillac - EOA - Don Eisenberger

DETAILED REVIEW CHECK LIST

Page 3

Claim No: <u>011577</u>	Claimant Name: <u>Harold Shepard Trust</u>
-------------------------	--

COMPLIANCE DOCUMENTATION	
DATE	ACTION/RESPONSE
12/88	Waste Oil Removed
9/92	Mineral spirits tank removed. Area of contamination from mineral spirits has received closure.
3/89	Waste Oil Area was re-excavated and soil and gw were sampled. Total of 27 cu. yds of petroleum hydrocarbon affected soil was excavated. The excavation was backfilled in June 1989 with imported fill.
4/89	County confirmed no further excavation was necessary. Requested a work plan for installation of GW monitoring wells.
12/89	Groundwater Technology - Results of Soil Characterization indicated migration of hydrocarbons downgradient from area of former waste oil.
2-3/93	Monitoring well installed and sampled. Fresh gasoline was detected in gw, but no waste or constituents were detected.
10/93	Additional investigation was performed to determine the degree, extent and likely source of the gasoline.
12/93	Soil and Groundwater Investigation concluded that petroleum hydrocarbon fuel had been released to the subsurface and that the primary source of the fuel release was a 10K gallon UST (Claimant not eligible for contamination resulting from this tank).
4/21/95	Quarterly GW Monitoring Report indicated relatively limited contamination from the former waste oil tank.
9/94	Report of Soil Excavation and Disposal Activities of 10K gallon tank excavation.
10/94	Additional soil excavation and sampling. Disposed of approx. 100 cu. yds of soil

10K UST was removed

Continued on Reverse

CONFIRMATION OF CORRECTIVE ACTION COMPLIANCE	
<input checked="" type="checkbox"/>	Claimant in Corrective Action Compliance
<input type="checkbox"/>	Claimant NOT in Corrective Action Compliance at the Time of this Review - 90 Day Letter Required
<input type="checkbox"/>	Claimant NOT in Corrective Action Compliance - Recommend Rejection
<u>Dale Klett</u>	8/15/96
LEAD AGENCY SIGNATURE	DATE
<u>Cheryl Gordon</u>	8/13/96
CLAIMS REVIEWER SIGNATURE	DATE

DETAILED REVIEW CHECK LIST

Page 4

Claim No: 11577	Claimant Name: Harold Shepard Trust
-----------------	-------------------------------------

COMPLIANCE DOCUMENTATION (Continued)	
DATE	ACTION/RESPONSE
1/95	Well Conversion and First Quarterly Monitoring Report: - 7 wells are located at the site
4/95	Second Qtr. Monitoring Report
7/95	Third Qtr. Monitoring Report
8/95	of split Groundwater "Hydrographs" Sampling purpose - to provide info on the distribution of hydrocarbons in the down-gradient direction. "Only six hydro pump sources.
1/96	Annual Monitoring Report
1/96	County requested a Corrective Action Plan.
2/96	County received CAP and directed RFS to proceed, CAP is for work associated with the 10K gallon tank.

**ALAMEDA COUNTY ENVIRONMENTAL
HEALTH SERVICES**

ENVIRONMENTAL PROTECTION DIVISION

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

Telephone (510) 567-6700

Fax (510) 337-9335

FAX COVER SHEET

DATE:

8/15, 1996

TO:

CHERYL GORDON

FAX #

(916) 227-4530

Total number of pages including cover sheet

4

FROM:

DALE KLETTKE

NOTE:

PLEASE RESPOND BY FAX ONLY.

**(SMILE) HAVE A NICE DAY
DO SOMETHING FOR OUR ENVIRONMENT**

EOA, Inc.

Eisenberg, Olivieri & Associates
Environmental and Public Health Engineering

FAX COVER SHEET

DATE: July 31, 1996

TO: Bill Cox
FAX #: 562-6070

cc: Bob Cross
Jerriann Alexander
Andy Briefer
Dale Klettke

FROM: Don Eisenberg **PROJECT:** CC05

PAGES: 1

SUBJECT: Corrective Action Plan, Phase II (CAP) - Remedial Technologies
Evaluation Report - Comments from Dale Klettke

MESSAGE: I talked by phone today with Dale Klettke of Alameda County
Department of Environmental Health. I have been trying to set
up a follow-up meeting to discuss the report we submitted last
week. Because of vacation schedules it may be weeks before
everyone would be able to attend. Dale does not feel that a
meeting is necessary, although he will attend one if we can
find a date that works. Attached are notes from my
conversation with Dale:

Notes on Phone Conversation with Dale Klettke - Tuesday, July 30, 1996

Dale indicated by phone that he agrees with the conclusions of the technology evaluation screening. However, he is concerned about both the cost and the difficulty of regulatory approval for the proposed system of extraction and re-infiltration. Based on the report that we submitted, he requested that we consider implementing the excavation of additional soil in the former piping leak area, outside of the building, combined with a limited grid of ORC boreholes in the area between the pipe leak location and the downgradient monitoring wells.

In our report, we had identified a similar alternative as a possible interim measure. Since we had received mixed opinions from experts on the potential effectiveness of the ORC borehole grid, we indicated that it would only be reasonable if implemented on a trial basis, with monitoring of effectiveness for six months to one year. Dale suggested that we implement such a trial, delay design and implementation of the active bioremediation system, and in about nine months to one year re-evaluate the need for additional measures based on the observed effectiveness of the interim measures.

I indicated to Dale that we could proceed to complete the conceptual design for this combination of corrective action alternatives (excavation and ORC borehole grid.) If this approach is even moderately effective, it would be far more cost-effective than the proven technology that is recommended in the Technology Evaluation Report. Since Dale has indicated that this approach would be preferred by the County, it seems to be worth implementing on a trial basis.

Please contact me by phone or fax with your comments on this matter. The County would like for us to proceed ASAP with completion of the conceptual design/workplan, so that Mr. Cox and the UST fund can obtain cost proposals for implementation.



Cal/EPA

State Water Resources Control Board

Division of Clean Water Programs

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4519
FAX (916) 227-4530

World Wide Web:
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

June 21, 1996

Mr. Steven S. Shulman
Wells Fargo Bank
525 Market Street, 18th Floor
San Francisco, CA 94105

Post-It™ brand fax transmittal memo 7671 # of pages 1

To <i>Dale Klettke</i>	From <i>C. Stevens</i>
Co.	Co.
Dept.	Phone #
Fax # <i>(510) 337-9835</i>	Fax #



Pete Wilson
Governor

Dear Mr. Shulman:

PRE-APPROVAL OF CORRECTIVE ACTION COST ESTIMATE, Claim No. 11577, 230 Bay Street, Oakland, CA

I have reviewed your request, received on June 18, 1996, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included another copy of the "Cost Pre-Approval Request" form for future use.

The costs detailed by PES in "Attachment 1" for conducting the work proposed in the April 18, 1996 workplan will not be eligible for reimbursement from the UST Cleanup Fund (Fund) for the following reasons:

- The purpose of the work is to detect or confirm the presence of contamination or confirm the presence of a suspected underground storage tank. The definition of corrective action, Section 2804, Chapter 18, UST Cleanup Fund regulations, specifically excludes detection and confirmation from the definition of corrective action. The Fund can only reimburse corrective action costs.
- The potential areas of contamination being located were not the result of releases from underground storage tanks.

Please call if you have any questions; I can be reached at the above number.

Sincerely,

Christopher Stevens, WRC Engineer
Underground Storage Tank Cleanup Fund Program

Attachment

cc: Mr. Dale Klettke w/o attachments
by fax: (510) 337-9335



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

**Alameda County Department of Environmental Health
Meeting Regarding Former Cox Cadillac Site - 230 Bay Place, Oakland
June 19, 1996**

Agenda

- I. Meeting objectives
- II. Review Phase I Cap Report findings
 - A. Previous site uses
 - B. Utilities location and vault survey
 - C. Risk screening results
 - D. General conclusions
- III. Review any new information and interpretation
 - A. Storm sewer odor reports ?
 - B. Storm sewer sampling ?
 - C. Any impact on Phase I CAP conclusions ?
- IV. Discuss County's requirements for additional site work

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

STID 494

June 25, 1996

Bill Cox Cadillac
ATTN: Bill Cox
232 East 14th Street
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P. O. Box 63700
San Francisco, CA 94163

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox and the Wells Fargo Bank Trust:

This letter is to document the results of the meeting held on June 19, 1996 at the Alameda County Health Care Services Agency, 1131 Harbor Bay Parkway, Alameda, CA. In attendance was Don Eisenberg of EOA, Inc., Jeri Alexander of Subsurface Consultants, Inc., Andy Briefer of PES Environmental and Mr. Bill Cox. Alameda County was represented by Thomas Peacock and myself.

As discussed in the meeting, this office requests that Phase II of the Corrective Action Plan (CAP) be submitted to this office which evaluates a variety of alternative cleanup technologies to effectively address the petroleum hydrocarbon contamination found in both the unsaturated and saturated zones.

Benzene levels in groundwater far exceed Tier 1 Risk-Based Screening Levels (RBSLs) for a target level of $1E-05$ (1 in 100,000 excess cancer risk). In addition, the benzene plume is being intercepted by numerous utilities in the direct vicinity of the down-gradient well TW-7, including a storm drain which discharges directly to the waters of Lake Merritt. **This site clearly does not qualify as a "Low-Risk Groundwater Case" as defined in the SWRCB "Supplemental Instructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Sites".**

Active cleanup measures for soil and groundwater need to be evaluated at this site. A feasibility study should be conducted to evaluate potential site remediation alternatives. The objective of the feasibility study is to identify a cost effective measure or combination of measures to remediate the existing gasoline plume.

These active cleanup measures should achieve residual risk levels which permit use of the subject property for all of the potential uses (residential/commercial), for which it is currently zoned. The cleanup measures should be directed at reducing benzene concentrations in groundwater on-site, immediately down gradient of the release location, and in unsaturated soil in the immediate vicinity of the release, to levels which **at a minimum** meet Tier 1 RBCA screening levels for a $1E-05$ (1 in 100,000) excess cancer risk. These target cleanup levels may need to be adjusted based on method detection limits and the actual observed overall effectiveness and cost of cleanup measures when implemented.

Mr Bill Cox and the Wells Fargo Bank Trust
RE: 230 Bay Place, Oakland
June 25, 1996
Page 2 of 3

As presented in the ASTM E1739 - 95 Tier 1 Risk-Based Screening Level (RSBL) Look-Up Table, for a residential receptor scenario and exposure pathway "Groundwater-Vapor Intrusion from Groundwater to Buildings", the Tier 1 CA-modified RSBL target level for benzene (1E-05, or 1 in 100,000 excess cancer risk) is 0.069 mg/L or 69 ppb. In addition, for a residential receptor scenario and exposure pathway "Soil-Vapor Intrusion from Soil to Buildings", the Tier 1 CA-modified RSBL target level for benzene (1E-05, or 1 in 100,000 excess cancer risk) is 0.016 mg/L or 16 ppb.

My understanding is that the following remedial measures are to be evaluated during this study:¹

- ◆ Excavation
- ◆ Soil-vapor extraction
- ◆ Insitu Bioremediation (active and passive methods)
- ◆ Bioaugmentation
- ◆ No Action (continued verification groundwater monitoring)

In addition, the following alternative cleanup technologies should be evaluated:

- ◆ Dual-phase extraction/Bioslurping
- ◆ Bioventing
- ◆ Air Sparging/Biosparging

Please incorporate the following information into Phase II of the CAP:

- 1) time frame defining specific tasks to be completed (feasibility evaluation and conceptual design)
- 2) cost/benefit analysis for each alternative cleanup technology evaluated

In addition, groundwater samples were analyzed for the Phase I CAP as part of a hydrocarbon-degrading bacterial plate enumeration assay. As documented in the February 29, 1996 CytoCulture Environmental Biotechnology report, "these water samples had low densities of hydrocarbon materials and low levels of dissolved nutrients. The dissolved oxygen levels also suggested relatively low biodegradation activity. This site might benefit from nutrient enhancement and bacterial augmentation".

Therefore, as part of an interim remedial action plan, please propose measures to be addressed concurrently with the ongoing investigation and feasibility studies, to reduce onsite groundwater benzene concentrations.

¹These items were proposed in EOA's, Corrective Action Plan, Attachment 1 - Proposed Scope of Work.

Bill Cox
RE: 230 Bay Place, Oakland
June 25, 1996
Page 3 of 3

Phase II of the Corrective Action Plan (CAP) including the Interim Remedial Action Plan is due within 30 days of the date of this letter, or by July 26, 1996. Please be advised that this letter constitutes a Legal Request for Technical Reports pursuant to California Health and Safety Code Sections 25299.37 and 25299.78.

Failure to undertake the required corrective action, including the submittal of a technical report after the date specified in this request, may result in fines of up to \$5,000 per day per tank pursuant to Health and Safety Code section 25299 and \$10,000 per day per tank pursuant to Health and Safety Code section 25299.76.

Please continue to adhere to a **quarterly** schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d). Sample analytes shall continue to be total volatile hydrocarbons as gasoline, (TVHg), EPA Method 8010 compounds (1,2-DCA) and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX). **In addition, please have the groundwater samples analyzed for the presence of methyl-tert-butyl ether (MTBE).** The MTBE analysis is being requested by the Regional Water Quality Control Board (RWQCB).

Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947
Gil Jensen, Alameda County District Attorneys Office
Christopher Stevens, UST Fund
Thomas Peacock, LOP Manager--files

Bx

**ALAMEDA COUNTY ENVIRONMENTAL
HEALTH SERVICES**

ENVIRONMENTAL PROTECTION DIVISION

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

Telephone (510) 567-6700 Fax (510) 337-9335

FAX COVER SHEET

DATE: 6/25, 19 96

TO: RON EISENBERG
FOR

FAX # (510) 832-2856

Total number of pages including cover sheet 3

FROM: DAVE KLETTE

NOTE:

PLEASE RESPOND BY FAX ONLY. DDC-INFO
SPOKE W/ CHRISTOPHER STEVENS OF THE
UST FUND. REQUESTED HIS HELP TO
EXPEDITE APPROVAL OF THE CAP-PHASE 2 THRU UST FUND.

**(SMILE) HAVE A NICE DAY
DO SOMETHING FOR OUR ENVIRONMENT**

EOA, Inc.

Eisenberg, Olivieri & Associates
Environmental and Public Health Engineering

FAX TRANSMITTAL

DATE: June 21, 1996

TO: Dale Klettke
Alameda County Health Agency
Department of Environmental Health

FAX #: (510) 337-9335

FROM: Don Eisenberg

PROJECT: CC05

SUBJECT: Former Cox Cadillac Site, 230 Bay Place, Oakland

MESSAGE: Based on our meeting on 6/19/96 attached is a brief memo outlining points for inclusion in the letter. Please call me if you wish to discuss any of these. Thanks for your help.

EOA, Inc.**MEMORANDUM**

TO: Dale Klettke (by Fax at 510-337-9335)

FROM: Don Eisenberg

DATE: June 20, 1996

SUBJECT: Former Cox Cadillac Site, 230 Bay Place, Oakland

Thanks for meeting with us yesterday. The meeting was very useful and productive, and we look forward to proceeding to the feasibility evaluation, design, and cleanup work at this site. Thank you for agreeing to assist Mr. Cox in obtaining pre-approval from the SWRCB UST Trust Fund for the cleanup effort. In developing Phase II of the CAP our objective will be to produce a document which can be submitted to SWRCB and pre-approved by them with minimal delay. As the first step in that process, you agreed yesterday to send Mr. Cox a letter documenting the specific objectives of the required cleanup effort, documenting that these requirements are based on a RBCA risk screening which shows that this site is clearly not in the 'Low Risk' category of sites which are questionable for UST Trust reimbursement, and documenting that final cleanup levels for site closure will be risk-based with a preliminary target of 10^{-5} incremental risk. You requested that we provide a note indicating what we feel are the important points to be included in the letter. We hope that the following notes are helpful to you in that respect.

Based on what was agreed at yesterday's meeting, we would like to see the following points addressed in the letter:

Although offsite migration has not been fully characterized, it has been characterized to the extent that is practical given that offsite migration appears to be limited and primarily controlled by backfill materials associated with numerous utilities in the street immediately adjacent to the site.

Active cleanup measures for soil and groundwater are required at this site because risk based screening, based on the RBCA model, indicates that certain on-site concentrations of benzene are far in excess of RBCA risk based screening levels. For that reason this site is clearly not in the category defined as 'Low Risk' by SWRCB and Regional Water Quality Control Board. Alameda County Department of Environmental Health has determined that active measures are necessary. Costs of such active measures should be reimbursable from the SWRCB UST Trust fund for sites such as this, subject to SWRCB pre-approval of the workplan and subject to availability of funds.

The active cleanup measures should be directed at reducing benzene concentrations in groundwater on-site, immediately downgradient of the release location, and benzene concentrations in unsaturated soil in the immediate vicinity of the release, to levels which meet RBCA screening levels for 10^{-5} incremental risk. These are target cleanup levels and may be adjusted based on the actual observed effectiveness and cost of cleanup measures when implemented.

Phase II of the Corrective Action Plan (Feasibility Evaluation and Conceptual Design) will be submitted to the County and to the SWRCB UST Trust in 8 weeks of the date of the County's letter. This will be considered a draft document subject to revision based on comments from SWRCB and from the County.

EOA, Inc.



PES Environmental, Inc.
Engineering & Environmental Services

Date

06/20/96 11:00 AM

FAX TRANSMITTAL

Number of pages including cover sheet 1

To:	Dale Klettke
Fax:	510 337-9335
Office:	ACDEH
Subject:	Bill Cox Cadillac
	cc:Rory Campbell HBMV&R

From:

PES Environmental, Inc.

1682 Novato Boulevard,
Suite 100

Novato, California 94947

Phone

(415) 899-1600

Fax Phone

(415) 899-1601

Sent By:

Andy Briefer

PES PROJECT

Urgent For your review Reply ASAP Please Comment

REMARKS:

As we discussed, the property owners require that the site be restored to an undamaged condition as quickly as possible. In order to accomplish that, the following components must be included:

- A schedule defining the specific tasks to be completed and associated timing and milestones which reflect the priority of the required cleanup;
- complete the lateral definition of the extent of contamination beneath the building in accordance with the recommendations in the Corrective Action Plan Development Report, Phase I (April 1, 1996);
- Define fate and transport of contaminants offsite to identify offsite risk/remedial response;
- Achieve residual risk levels which permit use of the property for all of the potential uses for which it is currently zoned (Residential/Commercial); and
- Implement interim remedial measures concurrent with ongoing investigation and feasibility studies to reduce onsite concentrations and prevent worsening of the offsite problem.

If this transmittal has been received in error, please contact

PES ENVIRONMENTAL, INC.

at your earliest convenience (415) 899-1600.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502
(510) 567-6814

ALAMEDA COUNTY ENVIRONMENTAL HEALTH LABORATORY

Certification No. 1816

Laboratory No: 96-039

Sample Identification: COX Cadillac, 230 Bay Place, Oakland, CA

Analysis Requested By: Dale Kelette

Date Collected: 6/10/96

Collected By: Dale Kelette

Date Received: 6/10/96

Received By: N. Leung

Analysis Requested: TPH-gasoline, BTEX.

Background Information: 1 water sample from the above location.

ANALYTICAL RESULTS

<u>Parameter</u>		<u>Observation or Results</u>				
LAB ID	SAMPLE ID	TPH-gas (mg/kg)	BENZENE (ug/kg)	TOLUENE (ug/kg)	ETHYL BENZENE (ug/kg)	XYLENE (ug/kg)
96-039-1	COX-A	ND(0.5)	ND(0.3)	ND(0.3)	ND(0.3)	3.5

ND=Not detected at or above reporting limit. (Reporting limit indicated in parentheses)

QA/QC SUMMARY

RPD, % 18
RECOVERY, % 87

Date Analysis Completed: 6/13/96

Chemist: N. Leung

Approved: *D.K.*

Distribution: Dale Kelette, Mee Ling Tung.

LAR# 96-039

white - lab
yellow - insp. file
pink - fac. file

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DIVISION OF HAZARDOUS MATERIALS
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
(415) 271-4320

LABORATORY SERVICE REQUEST

SITENAME COX CADILLAC
ADDRESS 230 BAY PLACE, OAKLAND
SAMPLE SUBMITTED TO: _____
DATE SUBMITTED _____
SEND INVOICE TO: _____

SEND ANALYTICAL REPORT TO ABOVE OR: _____
ATTN: _____
RUSH = ABOUT 1 WEEK TURNAROUND
ROUTINE = ABOUT 2 WEEKS TURN-AROUND

SAMPLE NO.	DATE/TIME COLLECTED	TYPE OF MATERIAL (WATER, SOIL OR MATRIX)	VOLUME/WEIGHT	FIELD OBSERVATION	ANALYSIS REQUESTED
COX-A	3:00PM	WATER (1 20ML VIAL)		PID READINGS	BTEX; TPH
COX-B	3:15P.M		NOT FULL	APPROXIMATELY 2PPM OVER BACKGROUND	

Chain of Custody:

1.	<u>[Signature]</u> Signature	<u>HMS</u> Title	<u>6/10/96</u> Inclusive Dates
2.	<u>[Signature]</u> Signature	<u>CHERIST</u> Title	<u>6/10/96</u> Inclusive Dates
3.	_____ Signature	_____ Title	_____ Inclusive Dates

EOA, Inc.

Eisenberg, Olivieri, & Associates
Environmental and Public Health Engineering

June 5, 1996

Mr. Dale Klettke
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577

Re: 230 Bay Place, Oakland, CA

Dear Mr. Klettke,

It is necessary for EOA, Inc. to provide a direct written response to your letter to Bill Cox Cadillac, dated May 29, 1996. Exchanging contentious letters is not EOA's preferred approach to reaching a consensus on the interpretation of available site information and determining appropriate actions. However, the subject letter contained an implication that EOA may have intentionally omitted relevant information in our report on this site dated April 1, 1996. We consider such an allegation to be very serious, and potentially libelous. In addition, the contents of the letter raises concern to us that, for whatever reason, our report and subsequent clarification letter have still not communicated the most important findings of the investigation.

Regarding the alleged omission of information, your letter states that "documentation of gasoline odors reported to representatives of EOA ...detected near storm sewer drop structures was curiously missing"(from the report). In fact these verbal reports were cited, at the end of the first paragraph of Section 5.0 (pg.4) as one of the reasons that we carried out the utility location and review work and the utility vault inspections. We have tried on several occasions to make it clear that these were informal verbal references to odor incidents which were said to have occurred prior to the tank removal and closure activities which took place in January 1994, more than two years ago. Prior to September 1993, when the tank was removed from service, there was an ongoing piping leak, and free product was accumulating on groundwater in the tank backfill, only a few feet from the storm sewer. Under those conditions, hydrocarbon vapors could have reached the storm sewer by several pathways.

Since the time of those alleged odor incidents, Mr. Cox has abated the leak, removed the tank and piping, removed approximately 100 cubic yards of contaminated soil and 600 gallons of free product/contaminated water. Subsequent monitoring has documented the absence of any free product in MW-7, the monitoring well located between the former tank location and the storm sewer. We are absolutely not aware of any report that there were odors in utility vaults or storm sewer facilities subsequent to the tank removal.

Regarding the interpretation of the utility vault survey, we have postulated only infiltration from groundwater as a potential route to the storm sewer. There is virtually no potential for the remaining hydrocarbon-polluted soil, which is beneath at least two feet of clean

96 JUN -7 PM 1:51
ENVIRONMENTAL
PROTECTION

Mr. Dale Klettke
June 4, 1996
Page 2 of 3

fill, to result in hydrocarbon-polluted surface runoff. For this reason, we would not expect any direct linkage between storm water flow and the amount of hydrocarbon in the storm sewer. The cross section contained in our report (Figure 5) shows the February 23, 1996 groundwater elevation relative to that of the storm sewers. The groundwater level is within 6 inches of the highest groundwater elevation observed in two years of monitoring, and it is well above the top of all three of the storm sewers. If infiltration was occurring in these pipes, it would be expected to occur under these conditions, and it would be easiest to detect when it is not diluted by storm water flow. That is why we inspected for water and odors in the storm sewers under conditions when runoff was not present.

The fact that no water or odors were observed at the time of our inspection, and that no odors have apparently been reported in the more than two years since source removal, is an indication to us that infiltration is not occurring. In our report we indicated that infiltration of groundwater into the storm sewer is a credible possible pathway for offsite exposure, but we have no evidence that any polluted groundwater is presently entering the storm sewer. If you are aware of some other evidence that is the basis for your conclusions, we request that you provide it for our future use in this investigation.

Finally, regarding the issue of "discharge" to the storm sewers, it is our understanding that we are discussing fate and transport, and requirements for monitoring, containing, and remediating, polluted groundwater. As we understand the water code, the discharge to waters of the state occurred at the time of the tank leak, and it has been abated. The purpose of our present investigation and discussion is to determine what, if any, response levels are necessary, including issues related to containment and monitoring. In that sense, potential infiltration to storm sewers is one additional pathway for pollutant migration, equivalent to expansion of the plume in groundwater. We agree that infiltration of any amount or concentration of hydrocarbon-polluted groundwater to the storm sewers is undesirable, can be regulated as part of monitoring and remediation activities, and may be unacceptable. We disagree that such migration, particularly at trace or de minimus levels is precluded by the water code. Again, we have no indication at present that there is currently any infiltration to the storm sewers, and so this may not be an issue at this site.

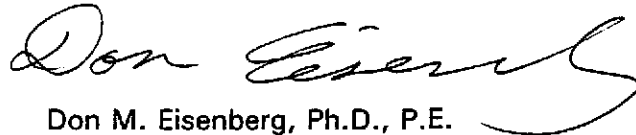
All of the above discussion is intended to clarify the basis for decision making. It is not intended as an argument about what, if any, clean-up levels or measures are appropriate at this site. We fully understand that the appropriate regulatory agencies have the authority and the responsibility to impose clean-up requirements consistent with applicable laws and regulations, and it is our belief that all of the parties involved would appreciate receiving the clearest possible guidance from you on that issue. However, we also think that it is critical for such decisions to make full use of the information that has been developed at considerable effort and expense in site investigations and monitoring.

EOA, Inc.

Mr. Dale Klettke
June 4, 1996
Page 3 of 3

We hope that this letter will be received as constructive and useful clarification. We would like to continue to work with you in a constructive manner to facilitate decisions regarding this site. Mr. Cox and I would like the opportunity to meet with you and Mr. Peacock as soon as possible to continue these discussions. I will be following up with you by phone to discuss this letter and to arrange a meeting. In the interim, if you have any questions, or wish to discuss this letter, please don't hesitate to call me.

Sincerely,
EOA, Inc.



Don M. Eisenberg, Ph.D., P.E.
President, Principal Engineer

cc: Bill Cox	H.W.Shepard Trust
Bob Cross	Thomas Peacock
Rory Campbell	Kevin Graves
Andy Briefer	Gil Jensen

EOA, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

STID 494

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

May 29, 1996

Bill Cox Cadillac
ATTN: Bill Cox
232 East 14th Street
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P. O. Box 63700
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including your May 20, 1996 letter.

For your information, in order for your site to qualify as a "Low Risk Groundwater Case" the following definitions must apply:

- 1) The leak has been stopped and ongoing sources, including free product, have been removed or remediated.
- 2) The site has been adequately characterized.
- 3) The dissolved hydrocarbon plume is not migrating.
- 4) No water well, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.
- 5) The site presents no significant risk to human health.
- 6) The site presents no significant risk to the environment.

As documented in the State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Fuel Sites, passive remediation, in conjunction with monitoring, is the preferred remedial alternative for "**Low-Risk Groundwater Cases**", unless there is a compelling reason to do otherwise.

A partial list of reasons that may justify active remediation are listed below:

- Groundwater within the plume is likely to be used before natural biodegradation is projected to complete the cleanup.
- Sensitive receptors have been identified and are projected to be adversely impacted.
- The plume is migrating significantly.
- Another remedial alternative is shown to be more cost effective.

Mr Bill Cox
RE: 230 Bay Place, Oakland
May 29, 1996
Page 2 of 3

Generally, if any of these conditions or others deemed to be compelling are met, a more aggressive remedial approach may be appropriate.

I disagree with the conclusions of your consultant that *neither the benzene concentration in soil, nor current levels of discharge from groundwater to the storm sewer, represent sufficient basis for concluding that passive remediation is not acceptable at this site.* Additional investigation and/or monitoring of water in the storm sewer will not reduce the risk for potential off-site receptors, nor will it reduce the risk for adverse impact of the waters of Lake Merritt.

After cursory review of the April 1, 1996 EOA, Inc. "Corrective Action Plan Development Report Phase 1", documentation of gasoline odors reported to representatives of EOA ("who were told verbally on several occasions") which were detected near storm sewer drop structures was curiously missing. As documented in the April 1, 1996 EOA, Inc report, "*a more likely pathway for ecological exposure would be through infiltration to storm sewers and subsequent discharge*" and "*it is our opinion that there is not presently a discharge from groundwater to the storm sewers at sufficient level to cause odors*". This opinion was reached based on vault observations of the three storm drain drop inlets during which "The three inlets did not appear to contain any water, nor were any notable odors observed". This would indeed be the case when no storm water discharge was occurring at the site, and odors would likely be present only during periods of storm water discharge. In addition, your consultants argues, that should contaminated groundwater infiltrate into storm water sewers it would likely be diluted prior to final discharge, incorrectly assumes that any amount of discharge of pollutants is allowed into the storm sewer system. **This is strictly forbidden by the Clean Water Act.**

Because of the potential for surface water impact and its likely impact to human and aquatic life, this office does not consider this site one of low risk. Therefore, this site does not warrant classification as a "Low-Risk Groundwater Case", for which passive remediation in conjunction with groundwater monitoring is the preferred remedial alternative.

Your request for an extension on the implementation of Phase II of your Corrective Action Plan is denied. Therefore, you are directed to proceed with Phase II of the CAP. Please notify this office 72 hours in advance of field operations involving the implementation of Phase II of the CAP. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

Mr Bill Cox
RE: 230 Bay Place, Oakland
May 29, 1996
Page 3 of 3

c: Gil Jensen, Alameda County District Attorneys Office
Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Andrew A. Briefer, PES Environmental Inc., 1682 Novato Blvd, Suite 100, Novato, CA
94947
Kevin Graves, RWQCB
Thomas Peacock, LOP Manager--files

bc
0494asap.dkt



BILL COX

SAN LEANDRO CHRYSLER PLYMOUTH

232 East 14th Street • San Leandro, California 94577-1896
510-562-4871 • Fax 510-562-6070

May 20, 1996

RE: 230 Bay Place
Oakland, CA 94612

Dale Klettke, CHMM
Hazardous Materials Specialist
Alameda County Environmental
Health Services
1131 Harbor Bay Pkwy, #250
Alameda, CA 94502-6577

ENVIRONMENTAL
PROTECTION
95 MAY 24 PM 12:52

Dear Dale,

I am in receipt of your letter dated May 2, 1996. I immediately forwarded the letter to my Consultant for his review and comments and I have attached his comments for your review. As you will note, in his letter dated May 9, 1996 his conclusions are opposite of yours. (copy attached)

In addition, the State Water Resource Control Board has not completed the hearings on the Lawrence Livermore Laboratory "Recommendations To Improve The Cleanup Process For California Leaking Underground Fuel Tanks" and therefore, we do not know what changes might be recommended that could affect our plan.

Furthermore, S. B. 1764 Technical Advisory Committee has not issued its' final report, which might have an effect.

We request an extension on Phase II of our Corrective Action Plan until these matters are resolved.

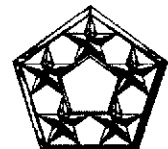
Yours truly,

William L. Cox
President

WLC/ceg

ENC: 1
CC: Robert Cross
EOA, Inc.
H. W. Shepard, Jr.
Wells Fargo Bank

CHRYLSER CORPORATION "AWARD FOR EXCELLENCE," DEALER



1996 FIVE-STAR

May 9, 1996

Mr. Bill Cox
232 East 14th St.
San Leandro, CA 94577

Re: 230 Bay Place, Oakland, CA

Dear Mr. Cox:

At your request we have reviewed the letter dated May 2, 1996 from Alameda County Environmental Health Services regarding the subject site. The letter contains a list of the objectives of the "Corrective Action Plan Development Report - Phase I" prepared by EOA and dated April 1, 1996, and it contains two staff findings as follows:

- 1) a brief summary of the RBCA Tier I risk findings described in the April 1 EOA report, and
- 2) a description of a site visit carried out by Dale Klettke, a County Hazardous Materials Specialist assigned to this site. In the letter, Mr. Klettke indicates that, based on the findings of the site visit, "passive remediation, in conjunction with monitoring, is not a viable alternative and that active measures will be required in order to protect the waters of Lake Merritt."

Additional clarification is provided below, for both of the technical findings cited in the letter. It is our opinion that without this clarification, both findings in the letter overstate the magnitude and urgency of potential health and environmental risk associated with the hydrocarbon pollution in soil and groundwater at this site.

RBCA Tier I Risk Screening

The letter's description of the findings of EOA's RBCA Tier 1 risk screening are correct, but incomplete. Based apparently on the County's review of the EOA report the letter states that "benzene concentrations exceeded risk based screening levels for the exposure pathways *soil vapor intrusion from soil to buildings*", "*soil volatilization to outdoor air*", and "*groundwater vapor intrusion to buildings*" for a target risk level of $1E-05$ " These findings are consistent with those described in the April 1 EOA report. However, in the EOA report, it is also pointed out that the concentrations which exceed RBSLs in vadose soil are limited to a small area in the parking lot near the former pipe leak location. Because benzene concentrations are very low (non-detectable) in unsaturated soil under the building, there is almost no potential for actual unacceptable vapor exposure from benzene in unsaturated soil, unless there is a major change in land use. Potential for volatilization from groundwater into the building appears to be the only pathway that is of reasonable concern at this site in its present configuration.

Mr. Bill Cox
May 9, 1996
Page 2

Findings of Mr. Dale Klettke's April 22, 1996 Site Visit

The letter indicates that the purpose of the Alameda County Environmental Health Services' site visit was to "visit the site to determine locations of possible off-site receptors in order to develop defensible Tier 2 site specific target levels (SSTLs)." During the site visit, Mr. Klettke spoke with the resident engineer of a neighboring apartment building, who recalled that they had smelled and reported gasoline vapors emanating from the storm sewer, but that the odors had not been reported recently. The letter indicates that based on this discussion, "passive remediation, in conjunction with monitoring, is not a viable alternative and that active measures will be required in order to protect the waters of Lake Merritt."

EOA's first involvement at this site was related to the removal of the fuel tank in January, 1994. In preparing for the tank removal representatives of EOA were told verbally on several occasions of gasoline odors which had been detected near storm sewer drop structures. We also heard by "word of mouth" that phone company employees may have reported gasoline vapors or free product in the telephone line vault near the sidewalk. However, at the time that EOA became involved at this site, the tank had been out of use for several months, and no detectable odors were present. We have not detected odors from storm drains, or any free product in the monitoring wells, during our monthly visits for monitoring, and we are not aware of any odor reports from neighbors since the tank was taken out of service and removed.

I understand that you have also confirmed, in follow-up conversations with representatives of St. Pauls Tower, that their odor reports almost certainly also predated the tank removal. Finally, as part of our recent survey of subsurface utilities (reported in the April 1 CAP Development Report) we actually opened most of the accessible vaults and manholes to check for odors, free product, or visible hydrocarbon pollution. None was detected. Based on all of the above, it is our opinion that there is not presently a discharge from groundwater to the storm sewers at sufficient level to cause odors.

The issue of potential discharge by infiltration through the storm sewers to Lake Merritt is identified and addressed in considerable detail in EOA's April 1 report. This issue is one of the reasons that the depths and locations of subsurface utilities were researched and presented in cross section and plan view. In the report, it is concluded that this is a potential route for offsite environmental exposure, and it is recommended that visual monitoring and limited sampling and analysis at one or more selected storm sewer sampling locations be added to the monitoring program. Any discharge to the storm sewer from groundwater which may be ongoing is likely to be of small volume through infiltration at pipe joints, at concentrations no higher than that measured in TW-7. During the wet season, when infiltration may occur, such flow is likely to be significantly diluted by much

Mr. Bill Cox
May 9, 1996
Page 3

larger volumes of surface runoff and groundwater infiltration. Additional investigation or monitoring would appear to be a more appropriate response for this identified potential pathway.

Conclusion

In conclusion, it is our opinion that neither the benzene concentration in soil, nor current levels of discharge from groundwater to the storm sewer, represent sufficient basis for concluding that passive remediation is not acceptable at this site. Additional investigation and/or monitoring of water in the storm sewer is warranted to further characterize this potential pathway, and additional monitoring of groundwater wells will provide information on whether passive remediation will achieve the necessary clean-up at a rate which is acceptable to you, the site owners, and the County.

Please call me if you have questions or wish to discuss this letter.

Sincerely,
EOA, Inc.



Don M. Eisenberg, Ph.D.
President

cc: Mr. Robert Cross

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

STID 494

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

(510) 567-6777

May 2, 1996

Bill Cox Cadillac
ATTN: Bill Cox
232 East 14th Street
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P. O. Box 63700
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the April 1, 1996 EOA, Inc., "Corrective Action Plan Development Report - Phase I".

Phase I of the Corrective Action Plan (CAP) was initiated for the following reasons:

- 1) to develop additional information about subsurface conditions which may effect movement of groundwater and the hydrocarbon plume.
- 2) to carry out a screening-level risk assessment to determine whether this site might be categorized as a "low risk" site pursuant to recent guidelines from the Regional Water Quality Control Board (RWQCB) or alternatively, what concentrations in soil and groundwater would need to be achieved to achieve such a classification.
- 3) to carry out biotreatability testing to determine the biodegradation activity and nutrient characteristics of the groundwater for use in selecting appropriate remediation measures in Phase II of the CAP development effort.

Results of a preliminary Tier I risk-based site assessment indicated that benzene concentrations exceeded risk based screening levels (RBSLs) for the exposure pathways "soil vapor intrusion from soil to buildings", "soil volatilization to outdoor air" and groundwater vapor intrusion to buildings" for a target risk level of 1E-05. Based on the information developed for this report, it appears necessary to reduce groundwater benzene concentrations under the building (and at the Bay Street property boundary) into the range of less than 0.2 mg/L to achieve cancer risk target levels of less than 1E-05 (1 in 100,000).

On April 22, 1996, I had a chance to visit the site to determine locations of possible off-site receptors in order to develop defensible Tier 2 site specific target levels (SSTLs). During my visit I spoke with Frank Tinley (resident engineer - 835-4700) of the St. Pauls Tower Complex located at 100 Bay Place. He informed me that compliants were filed (City of Oakland?) pertaining to the occurrence of gasoline odors emanating from the storm drains located at the corner of Bay Place and Vernon Street. He stated that at times these odors were very strong, but

Mr Bill Cox
RE: 230 Bay Place, Oakland
May 2, 1996
Page 2 of 2

that the odors had not been reported recently. These storm drains discharge directly to the waters of Lake Merritt, which is approximately 700 feet south of the site. Therefore this agency determines that at the present time, passive remediation, in conjunction with monitoring, is not a viable alternative and that active measures will be required in order to protect the waters of Lake Merritt.

Therefore, you are directed to proceed with Phase II of the Corrective Action Plan. Please implement Phase II of the CAP within 30 days of the date of this letter, or no later than June 3, 1996.

In addition, this office has also reviewed the April 18, 1996 PES Environmental, Inc., "Work Plan Potential Source Investigation".

This work plan was developed in order to address additional potential sources of contamination which were noted during a site walk-through performed by PES, EOA and yourself in January 1996. Areas of concern include, but are not limited to, hydraulic lifts, floor drains and sumps at the former indoor service area, and floor drains and sumps in the paint booth and bodywork area. In addition, no documentation exists regarding the removal of a suspected second waste oil tank near the former wash rack area.

The PES Environmental work plan is approved. Please be advised that the implementation of the PES work plan should not in any way, delay implementation of Phase II of the Corrective Action Plan.

Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Andrew A. Briefer, PES Environmental Inc., 1682 Novato Blvd, Suite 100, Novato, CA 94947
Kevin Graves, RWQCB
Thomas Peacock, LOP Manager--files

0494cap2.ok

Pc

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

STID 494

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

February 26, 1996

Bill Cox Cadillac
ATTN: Bill Cox
232 East 14th Street
San Leandro, CA 94577

H. W. Shephard, Jr.
Wells Fargo Bank Trust
P. O. Box 63700
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the February 20, 1996 EOA, Inc., "Cox Cadillac Corrective Action Plan".

It is my understanding that the Corrective Action Plan (CAP) will be completed in two phases; the first phase of work for the CAP will include the following:

- * Review of Site History to Identify Potential Subsurface Structures;
- * Utility Location Review
- * Develop Assumptions Regarding Magnitude and Extent of Hydrocarbon Plume Beneath Building
- * Preliminary Risk Assessment (based on assumptions above)
- * Biotreatability Sampling and Analysis

The Feasibility Study and the Conceptual Remedial Design will be completed during the second phase of work and will be contingent upon the results of the first phase of work.

Please proceed with Phase I of the Corrective Action Plan. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,

Dale Klettke, CHMM
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612
Thomas Peacock, LOP Manager--files

Be
0494cap.ok

EOA, Inc.

ENVIRONMENTAL
PROTECTION
CORPORATION
02 FEB 22 PM 1:31

Eisenberg, Olivieri, & Associates
Environmental and Public Health Engineering

February 20, 1996

Mr. Dale Klettke
Alameda County Health Care Services Agency
Department of Environmental Health
1731 Harbor Bay Parkway
Alameda, CA 94502

SUBJECT: Cox Cadillac Corrective Action Plan

Dear Mr. Klettke:

I have enclosed a copy of the client-approved scope of work and anticipated schedule for completion of the Cox Cadillac Corrective Action Plan (CAP) for your review and comment. As you and I discussed in January, the CAP tasks will be completed in two phases; the first phase of work for the CAP will include the following major tasks:

- Review of Site History to Identify Potential subsurface Structures;
- Utility Location Review;
- Develop Assumptions Regarding Magnitude and Extent of Hydrocarbon; Plume Beneath Building;
- Preliminary Risk Assessment (based on assumptions above); and
- Biotreatability Sampling and Analysis.

A report will be prepared and submitted to you after these tasks are complete. The Feasibility Study (FS) and Conceptual Remedial Design (CRD) tasks will be completed during the second phase of work and will be contingent upon the results of the first phase of work. It is anticipated that the first phase of work may include detailed recommendations regarding additional soil and/or groundwater sampling which may be necessary to verify assumptions or to verify pollutant degradation/remediation. Such additional sampling would be implemented in the second phase of work or in the remediation phase.

As the attached schedule shows, it is anticipated that the work will be completed within eight weeks. Time for County review and comment is not included in that eight-week period.

We would like to have your written comments to the attached scope and schedule at your earliest convenience. If the anticipated schedule is followed, the first phase, described above, will be completed by April 9, 1996, which is the completion date specified in your letter, dated January 9, 1996. A separate report on the second phase of work will be completed and submitted to you at a later date.

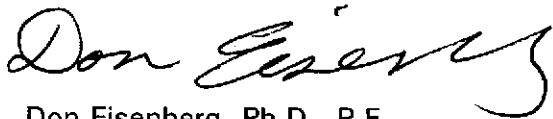
F:\CC05\Klettke.ltr

Page 2

Mr. Dale Klettke
February 20, 1996

If you have any questions about the CAP or anticipated schedule, please call me or Sherris Ragsdale at (510) 832-2852.

Sincerely,
EOA, Inc.

A handwritten signature in cursive script that reads "Don Eisenberg". The signature is written in black ink and is positioned above the typed name.

Don Eisenberg, Ph.D., P.E.
President

Attachments

**ANTICIPATED SCHEDULE FOR CORRECTIVE ACTION PLAN
COX CADILLAC**

WEEKS

TASK	1	2	3	4	5	6	7	8	9	10	11
1-Site History		1									
2-Utility Location			1								
3-Building Investigation	NA										
4-Risk Assessment											
5-Sampling and Analyses											
7-Report, SCI											
7-Report, EOA											

1 - SCI and EOA meet to discuss results

**ATTACHMENT 1
PROPOSED SCOPE OF WORK
CORRECTIVE ACTION PLAN**

The following is a workplan for evaluating the feasibility and potential effectiveness of several remedial measures and developing a Corrective Action Plan (CAP) for remediation of petroleum hydrocarbons in soil and groundwater at the former Cox Cadillac site 230 Bay Place, Oakland, CA..

Task 1 - Site History Research

History of the property will be researched to determine previous site uses and locations of former improvements. The research will include, but is not limited to:

- Reviewing historical aerial photographs and maps,
- Reviewing available local agency records of the site,
- Contacting other pertinent sources which become apparent from the research.

The focus of this effort will be to determine if there is any information which may identify potential subsurface structures which may influence pollutant migration and remediation.

Task 2 - Utility Location Review

Utility plans provided by PES Engineers will be used to prepare a site plan indicating approximate locations of utilities in the immediate downgradient area. In addition, a cross sectional plan will be prepared indicating the apparent relationship between groundwater levels and probable utility trench locations.

To address potential migration of site groundwater into the utility vaults, USA will be contacted to arrange site meetings with local utility companies, to view utility vaults in the site vicinity and to check if water or visible signs of petroleum hydrocarbons are present in the vault. An LEL or PID meter will be used to verify the presence or absence of hydrocarbon vapors are in the vaults.

EOA, Inc.

Task 3 - Develop Assumptions Regarding Magnitude and Extent of Hydrocarbon Plume Beneath Building.

The CAP will be developed based on existing information and assumptions, without additional sampling under the building. The assumptions will necessarily be conservative, assuming that the plume is symmetrical and reflecting known concentrations in existing monitoring wells. It is anticipated that additional soil and groundwater sampling within the building, and installation of one or two new monitoring wells to define lateral extent, may be included in the corrective action plan, and implemented at a later date to verify assumptions used in developing the corrective action plan.

Task 4 - Preliminary Risk Assessment

A Tier 1 risk analysis of the site will be performed in accordance with the Risk-Based Corrective Action (RBCA) analysis process as outlined in ASTM ES38-94. Applicable site constraints and parameters will be incorporated into the analysis. Scenarios involving the most sensitive reasonable future commercial site uses will be evaluated. Soil and groundwater cleanup values will also be evaluated. Because this is a fuel leak site, only constituents contained in RBCA will be addressed in the preliminary risk assessment.

Task 5 - Feasibility Study

A feasibility study will be conducted to evaluate potential site remediation alternatives. The objective of this task is to identify a cost effective measure or combination of measures to remediate the existing gasoline plume. As part of this task it is necessary to evaluate the potential treatability of the groundwater plume.

The following remedial measures will be considered during this study:

- Excavation
- Vapor Extraction
- Insitu Bioremediation (active and passive methods)
- Bioaugmentation
- No Action

Based on conversations with Dale Klettke of Alameda County, groundwater extraction and treatment will not be among the alternatives evaluated. However, extraction and reinjection may be included in one or more of the bioremediation alternatives to be considered.

Existing monitoring wells TW-2, TW-6, TW-7 and MW-1 will be sampled for biotreatability characterization. Results of the sampling will be used to estimate the effectiveness and cost of remedial measures being investigated. Groundwater samples collected for biotreatability will be analyzed for the following:

- Ammonia Nitrate
- Nitrate Nitrogen
- Ortho-Phosphate
- pH
- Dissolved Oxygen
- Bacterial Plate Count

Data gathered during this task will be summarized and recommendations for a remedial alternative will be presented.

Task 6 - Conceptual Remedial Design

Based on meetings with the client and representatives of PES, a plan describing a recommended remedial alternative or combination of alternatives will be prepared. The plan will include a graphic schematic indicating a proposed layout of the selected alternative. The plan will be appropriate for submittal to selected specialty remediation contractors to obtain more detailed designs and cost estimates.

Task 7 - Report Preparation

Results of Tasks 1-8 will be summarized and a corrective action plan will be prepared. The plan will document work performed at the site, results of the risk assessment and feasibility study and technical and cost basis for the proposed corrective action recommendation.

Task 8 - Project Coordination and Meetings

This task includes meetings and interaction with the client, attorneys, and consultants other than SCI, associated with this project. A meeting reviewing and selecting a remedial alternative is scheduled for week 6 of the project. A second meeting is scheduled for week 7 of the project to review the remedial design.

This task also includes submitting the workplan for developing a Corrective Action Plan to Alameda County for review. This task includes follow up to obtain and respond to comments from the County and from Wells Fargo Trust representatives, and to obtain County approval.



BILL COX
SAN LEANDRO CHRYSLER • PLYMOUTH

232 East 14th St. • San Leandro, CA 94577
510-562-4871 • Fax 562-6070

16 January 1996

Mr. Dale Klettke
Alameda County Health Care Services Agency
Department of Environmental Health
1731 Harbor Bay Parkway
Alameda, CA 94502

SUBJECT: Annual Monitoring Report
Cox Cadillac, 230 Bay Place, Oakland, CA

95 JAN 22 PM 4:45
RECEIVED
ENVIRONMENTAL HEALTH

Dear Mr. Klettke:

Enclosed is one copy of the "Annual Monitoring Report" for the Cox Cadillac, 230 Bay Place, Oakland, California site. The report was completed according to Task III of the approved Work Plan for Further Investigation, 230 Bay Place, Oakland, California (Work Plan), dated March 1994. As recommended in your June 7, 1994 Work Plan approval letter, well TW-2 was used as an upgradient well for the purpose of estimating groundwater flow direction only, and well TW-6 was sampled for groundwater analyses.

This report summarized the results of groundwater monitoring during the period December 1994 through November 1995. Monthly monitoring of groundwater elevations during October and November are the only activities conducted since the last quarterly report. The results of that additional work represent the only previously unreported data included in this annual summary.

Please call me if you have any questions regarding the report.

Sincerely,

William L. Cox
President
Bill Cox Inc.

Attachment

CC: Andy Briefer, PES
Rory Campbell
File

ALABAMA COUNTY HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 510/271-4320

*9-16-92
 Please note additional requirements
 re letter # B.C.H. 16.1*

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH
 470 22nd Street, 1st Floor
 Oakland, CA 94612
 Telephone (415) 374-2237

These plans have been reviewed and found to be acceptable and to comply with the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. The attached permit is now subject for issuance at any time if building permits for construction.

Construction of these remedial plans must be on the job and approved by all contractors and craftsmen involved with the removal.

A violation or alteration of these plans and specifications may be subject to the Department and to the Fire and Building Inspection Department to determine if such criteria meet the requirements of State and local laws. Notify the Department at least 48 hours prior to the following remedial operations:

- _____ Removal of Tank and Piping
- _____ Sampling
- _____ Final Inspection

Issuance of a permit is dependent on compliance with applicable plans and all applicable laws and regulations.

THIS PERMIT IS VALID ONLY FOR THE OPERATIONS DESCRIBED IN THESE INSTRUCTIONS.

UNDERGROUND TANK CLOSURE PLAN

*** * * Complete according to attached instructions * * ***

1. Business Name Cox Cadillac
 Business Owner Bill Cox

2. Site Address 230 Bay Street *(27th + Harrison)*
 City Oakland Zip 94610 Phone (415) 477-1000

3. Mailing Address P.O. Box 63939, San Francisco, CA 94163
 City San Francisco Zip 94163 Phone (415) 396-6743

4. Land Owner Wells Fargo Bank as Trustee for Harold Shepard Trust
 Address P.O. Box 63939 City, State San Francisco Zip 94163

5. Generator name under which tank will be manifested _____
Wells Fargo Bank as Trustee for Harold Shepard Trust

EPA I.D. No. under which tank will be manifested CAC000822840

6. Contractor C.K.C. INCORPORATED
Address P.O. Box 2327
City Paso Robles, CA 93447 Phone (408)627-2595
License Type* A, Hazardous License ID# 534002

*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. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant PES Environmental, Inc.
Address 1682 Novato Blvd.
City Novato, CA 94947 Phone (415) 899-1600

8. Contact Person for Investigation
Name Andrew Briefer Title Senior Engineer
Phone (415) 899-1600

9. Number of tanks being closed under this plan 1
Length of piping being removed under this plan 0
Total number of tanks at facility 2

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

** Underground tanks are hazardous waste and must be handled **
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter

Name C.K.C. Incorporated EPA I.D. No. CAD980584510
Hauler License No. 0381 License Exp. Date 4/30/93
Address P.O. Box 2327
City Paso Robles State CA Zip 93447

b) Product/Residual Sludge/Rinsate Disposal Site

Name Refineries Service EPA I.D. No. CAD083166728
Address 13331 North HWY 33
City Patterson State CA Zip 95363

c) Tank and Piping Transporter

Name C.K.C. Incorporated EPA I.D. No. CAD980584510
Hauler License No. 0381 License Exp. Date 4/30/93
Address P.O. Box 2327
City Paso Robles State CA Zip 93447

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. Experienced Sample Collector

Name Daniel Trumbly
Company PES Environmental, Inc.
Address 1682 Novato Blvd.
City Novato State CA Zip 94947 Phone (415)899-1600

12. Laboratory

Name Superior Analytical Labs.
Address 1555 Burke Street
City San Francisco State CA Zip 94124
State Certification No. 1332

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

If yes, describe. There are no known releases from the mineral
spirits tank.

14. Describe methods to be used for rendering tank inert

Dry Ice will be applied in the tank at the rate of 15 lbs. per 1,000 gallons.

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 plugged.

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
1,200 gals.	Tank contains up to 200 gallons of liquid identified as mineral spirits. The tank has not been used since before 1970. There is currently no evidence of product piping. A sample of the tank contents was analyzed in 1989 and contained mineral spirits with 470 parts per billion of 1,1,2,2-tetrachlorethene. Details of tank installation are unknown.	Tank contents will be sampled and analyzed for the constituents designated in Table 2 for unknown tank contents.	From the Tank <i>at soil/stockpile interface into 2' of retail soil</i>
		Soil will be sampled from the ends of the tank pit at the depth of the groundwater.	3 feet deep at both ends at the tank pit
		Groundwater	from the tank pit
		Soil	from the stockpile

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

Excavated/Stockpiled Soil

Stockpiled Soil Volume (Estimated)	Sampling Plan
50-60 CY loose	2 composite soil samples will be collected to evaluate the soil for disposal. Each sample will be composited from three locations. Soil will be analyzed for total petroleum hydrocarbons as mineral spirits, benzene, toluene, ethylbenzene, and solvents and any other constituents detected in the tank contents.

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

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.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
Mineral Spirits	EPA Method 8015		soil water 10ppm 50ppm
Chlorinated Hydrocarbons	EPA Method 8010		5ppb 0.5ppb
BTEX	EPA Method 8020		3ppb 5ppb
Oil and Grease	EPA 5520		50ppm 5ppm
Cd, Cl, Pb, Zn, Ni	1 cap EPA 7000 series	Cd	1ppm 0.05ppm
<i>TPH (gas)</i>		Cl	5ppm 0.05ppm
		pb	5ppm 0.1 ppm
		Ni	10ppm 0.1 ppm
		Zn	20ppm 0.05ppm
Semi-Volatile Organics	EPA 8270		≤5ppm ≤40ppm

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer See Attached Copy

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 report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

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

I declare that to the best of my knowledge and belief 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 an approval from the Department of Environmental Health 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.

Signature of Contractor

Name (please type) Steve Mueller, C.K.C. Inc. Project ManagerSignature Date September 10, 1992

Signature of Site Owner or Operator

Name (please type) Wells Fargo Bank, N.A., as trustee
of the Harold W. Shepard TrustSignature Date September 10, 1992

INSTRUCTIONS

General Instructions

- * Three (3) copies of this plan plus attachments and 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.

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 Health Services, 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) Page for employees to sign indicating 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 tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County 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 our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). 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) Description of sampling methods;
- 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) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25182.7 OF THE HEALTH AND SAFETY CODE.	
REPORT DATE 1 <u> </u> 2 <u> </u> 0 <u> </u> 5 <u> </u> 8 <u> </u> 8 <u> </u>		CASE # _____			
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Robert S. Corsun		PHONE (415) 682-3636		SIGNATURE
	REPRESENTING <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER Contractor		COMPANY OR AGENCY NAME R.S. Eagan and Company		
	ADDRESS 150-K Mason Circle Street Concord CA 94520				
RESPONSIBLE PARTY	NAME Wells Fargo Bank Trustee for Harold Sheppard Trust		CONTACT PERSON Mary Ellen Idziak		PHONE (415) 396-6742
	ADDRESS 525 Market Street, 17th Floor Street San Francisco CA 94163				
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Bill Cox Cadillac		OPERATOR Frank Jessup		PHONE (415) 451-2400
	ADDRESS 230 Bay Place Street Oakland Alameda 94604				
	CROSS STREET 27th & Harrison		TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> OTHER mixed		TYPE OF BUSINESS <input type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input checked="" type="checkbox"/> OTHER Auto Dealer
IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care		AGENCY NAME Alameda County Health Care		CONTACT PERSON Dennis Byrne
	PHONE (415) 271-4320				
SUBSTANCES INVOLVED	(1) NAME Diesel Fuel		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN		
	(2) NAME Waste Motor Oil		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN		
DISCOVERY/ABATEMENT	DATE DISCOVERED 1 <u> </u> 2 <u> </u> 0 <u> </u> 6 <u> </u> 8 <u> </u> 8 <u> </u>		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER		
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER		
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 1 <u> </u> 2 <u> </u> 0 <u> </u> 1 <u> </u> 8 <u> </u> 8 <u> </u>				
SOURCE/CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		TANKS ONLY CAPACITY 3,000 GAL		MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER
	AGE <input checked="" type="checkbox"/> UNKNOWN		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER		
CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)				
	CHECK ONE ONLY <input type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input checked="" type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES				
REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)				
	<input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)				
COMMENTS	Tank has been removed and source of leak eliminated. Samples are into lab for analysis. Expect results mid-December 1988.				



PES Environmental, Inc.
Engineering & Environmental Services

R0148

PES ENVIRONMENTAL, INC.

TEL: (415) 899-1600

FAX: (415) 899-1601

TO: Don Huang

COMPANY: ACEHS

FAX NO: 510/337-9335

PHONE NO: 567-6746

FROM: Francis Puck

JOB NO: _____

RE: Letter Re: Waste O/L UST @ Coy

DATE: 7/15/03 TIME: 3 PM SENT BY: FWS

NUMBER OF PAGES 2 HARD COPY TO FOLLOW: YES _____ NO X
(including cover sheet)

NOTES: Found this letter in our files
re: W.O. UST @ 250 Bay Place.
Please review and let me know if
you'd like to discuss this further.
Thanks,

If this transmittal has been received in error
please contact

PES ENVIRONMENTAL, INC. at your earliest convenience (415) 899-1600

R.S. EAGAN & CO.

General Contractors
General Engineering: Process Piping & Electrical



LIC. #476428

150-K MASON CIRCLE
CONCORD, CA 94520
(415) 682-3636

April 14, 1989

Alameda County Health Care Service
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621
ATTENTION: MR. DENNIS BRYNE

RE: Bill Cox Cadillac

Gentlemen:

Enclosed is a zerox copy of the lab report. We previously sent a preliminary report on April 12, 1989.

We intend on continuing the excavation and sampling work on Monday, April 17, 1989.

Sincerely,

R.S. EAGAN AND COMPANY

Robert S. Corsun 89

Robert S. Corsun
Project Manager

RSC:jj

Enclosure

TAL

RECEIVED
APR 16 1989

EAGAN & COMPANY

DATE: 4/13/89
LOG NO.: 7142
DATE SAMPLED: 3/17/89
DATE RECEIVED: 3/17/89

CUSTOMER: R.S. Eagan and Company
REQUESTER: Bob Corsun
PROJECT: No. 8-134, Bill Cox Cadillac, 27th & Harrison,
Oakland, California

Sample Type: Soil

Method and Constituent	Units	No. 1	Vent End	No. 2	Fill End
		Concen- tration	Detection Limit	Concen- tration	Detection Limit
DHS Method:					
Total Petroleum Hydro- carbons as Diesel	mg/kg	48	3	150	3
Total Petroleum Hydro- carbons as Gasoline	mg/kg	45	0.5	< 0.5	0.5
Modified EPA Method 8020:					
Benzene	mg/kg	< 0.02	0.02	< 0.02	0.02
Toluene	mg/kg	0.42	0.02	< 0.02	0.02
Xylenes	mg/kg	1.5	0.05	< 0.05	0.05
Ethyl Benzene	mg/kg	1.2	0.04	< 0.04	0.04
Standard Method 503E, Hydrocarbons:					
Oil and Grease	mg/kg	< 10	10	25	10

DATE: 4/13/89
 LOG NO.: 7142
 DATE SAMPLED: 3/17/89
 DATE RECEIVED: 3/17/89
 PAGE: Two

Sample Type: Soil

Method and Constituent	Units	No. 1	Vent End	No. 2	Fill End
		Concen- tration	Detection Limit	Concen- tration	Detection Limit
EPA Method 8010:					
Benzyl chloride	mg/kg	< 0.05	0.05	< 0.05	0.05
Bis (2-chloroethoxy) methane	mg/kg	< 0.05	0.05	< 0.05	0.05
Bis (2-chloroisopropyl) ether	mg/kg	< 0.05	0.05	< 0.05	0.05
Bromobenzene	mg/kg	< 0.05	0.05	< 0.05	0.05
Bromodichloromethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Bromoform	mg/kg	< 0.05	0.05	< 0.05	0.05
Bromomethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Carbon tetrachloride	mg/kg	< 0.05	0.05	< 0.05	0.05
Chloroacetaldehyde	mg/kg	< 0.05	0.05	< 0.05	0.05
Chloral	mg/kg	< 0.05	0.05	< 0.05	0.05
Chlorobenzene	mg/kg	< 0.05	0.05	< 0.05	0.05
Chloroethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Chloroform	mg/kg	< 0.05	0.05	< 0.05	0.05
1-Chlorohexane	mg/kg	< 0.05	0.05	< 0.05	0.05
2-Chloroethyl vinyl ether	mg/kg	< 0.05	0.05	< 0.05	0.05
Chloromethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Chloromethyl methyl ether	mg/kg	< 0.05	0.05	< 0.05	0.05
Chlorotoluene	mg/kg	< 0.05	0.05	< 0.05	0.05
Dibromochloromethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Dibromomethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,2-Dichlorobenzene	mg/kg	< 0.05	0.05	< 0.05	0.05
1,3-Dichlorobenzene	mg/kg	< 0.05	0.05	< 0.05	0.05
1,4-Dichlorobenzene	mg/kg	< 0.05	0.05	< 0.05	0.05

DATE: 4/13/89
 LOG NO.: 7142
 DATE SAMPLED: 3/17/89
 DATE RECEIVED: 3/17/89
 PAGE: Three

Sample Type: Soil

<u>Method and Constituent</u>	<u>Units</u>	<u>No. 1</u>	<u>Vent End</u>	<u>No. 2</u>	<u>Fill End</u>
		<u>Concen- tration</u>	<u>Detection Limit</u>	<u>Concen- tration</u>	<u>Detection Limit</u>
EPA Method 8010, Continued:					
Dichlorodifluoromethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,1-Dichloroethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,2-Dichloroethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,1-Dichloroethylene	mg/kg	< 0.05	0.05	< 0.05	0.05
trans-1,2-Dichloro- ethylene	mg/kg	< 0.05	0.05	< 0.05	0.05
Dichloromethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,2-Dichloropropane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,3-Dichloropropylene	mg/kg	< 0.05	0.05	< 0.05	0.05
1,1,2,2-Tetrachloro- ethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,1,1,2-Tetrachloro- ethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Tetrachloroethylene	mg/kg	< 0.05	0.05	< 0.05	0.05
1,1,1-Trichloroethane	mg/kg	< 0.05	0.05	< 0.05	0.05
1,1,2-Trichloroethane	mg/kg	< 0.05	0.05	< 0.05	0.05
Trichloroethylene	mg/kg	< 0.05	0.05	< 0.05	0.05
Trichlorofluoro- methane	mg/kg	< 0.05	0.05	< 0.05	0.05
Trichloropropane	mg/kg	< 0.05	0.05	< 0.05	0.05
Vinyl chloride	mg/kg	< 0.05	0.05	< 0.05	0.05

DATE: 4/13/89
LOG NO.: 7142
DATE SAMPLED: 3/17/89
DATE RECEIVED: 3/17/89
PAGE: Four

Sample Type: Water

<u>Method and Constituent</u>	<u>Units</u>	<u>No. 4</u>	
		<u>Concen- tration</u>	<u>Detection Limit</u>
DHS Method:			
Total Petroleum Hydrocarbons as Diesel	mg/l	2.1	0.08
Total Petroleum Hydrocarbons as Gasoline	mg/l	0.55	0.002
Modified EPA Method 8020:			
Benzene	mg/l	< 0.0004	0.0004
Toluene	mg/l	0.00047	0.0004
Xylenes	mg/l	0.018	0.0007
Ethyl Benzene	mg/l	0.004	0.0006
Standard Method 503E, Hydrocarbons:			
Oil and Grease	mg/l	10	0.2

DATE: 4/13/89
 LOG NO.: 7142
 DATE SAMPLED: 3/17/89
 DATE RECEIVED: 3/17/89
 PAGE: Four

Sample Type: Water

<u>Method and Constituent</u>	<u>Units</u>	<u>No. 4</u>	
		<u>Concen- tration</u>	<u>Detection Limit</u>
DHS Method:			
Total Petroleum Hydrocarbons as Diesel	mg/l	2.1	0.08
Total Petroleum Hydrocarbons as Gasoline	mg/l	0.55	0.082
Modified EPA Method 8020:			
Benzene	mg/l	< 0.0004	0.0004
Toluene	mg/l	0.00047	0.0004
Xylenes	mg/l	0.018	0.0007
Ethyl Benzene	mg/l	0.004	0.0006
Standard Method 503E, Hydrocarbons:			
Oil and Grease	mg/l	10	0.2

1

DATE: 4/13/89
 LOG NO.: 7142
 DATE SAMPLED: 3/17/89
 DATE RECEIVED: 3/17/89
 PAGE: Five

Sample Type: Water

<u>Method and Constituent</u>	<u>Units</u>	<u>No. 4</u>	
		<u>Concen- tration</u>	<u>Detection Limit</u>
EPA Method 8010:			
Benzyl chloride	mg/l	< 0.0005	0.0005
Bis (2-chloroethoxy) methane	mg/l	< 0.0005	0.0005
Bis (2-chloroisopropyl) ether	mg/l	< 0.0005	0.0005
Bromobenzene	mg/l	< 0.0005	0.0005
Bromodichloromethane	mg/l	< 0.0005	0.0005
Bromoform	mg/l	< 0.0005	0.0005
Bromomethane	mg/l	< 0.0005	0.0005
Carbon tetrachloride	mg/l	< 0.0005	0.0005
Chloroacetaldehyde	mg/l	< 0.0005	0.0005
Chloral	mg/l	< 0.0005	0.0005
Chlorobenzene	mg/l	< 0.0005	0.0005
Chloroethane	mg/l	< 0.0005	0.0005
Chloroform	mg/l	< 0.0005	0.0005
1-Chlorohexane	mg/l	< 0.0005	0.0005
2-Chloroethyl vinyl ether	mg/l	< 0.0005	0.0005
Chloromethane	mg/l	< 0.0005	0.0005
Chloromethyl methyl ether	mg/l	< 0.0005	0.0005
Chlorotoluene	mg/l	< 0.0005	0.0005
Dibromochloromethane	mg/l	< 0.0005	0.0005
Dibromomethane	mg/l	< 0.0005	0.0005
1,2-Dichlorobenzene	mg/l	< 0.0005	0.0005
1,3-Dichlorobenzene	mg/l	< 0.0005	0.0005
1,4-Dichlorobenzene	mg/l	< 0.0005	0.0005

DATE: 4/13/89
LOG NO.: 7142
DATE SAMPLED: 3/17/89
DATE RECEIVED: 3/17/89
PAGE: Six

Sample Type: Water

<u>Method and Constituent</u>	<u>Units</u>	<u>No. 4</u>	
		<u>Concen- tration</u>	<u>Detection Limit</u>
EPA Method 8010, Continued:			
Dichlorodifluoromethane	mg/l	< 0.0005	0.0005
1,1-Dichloroethane	mg/l	< 0.0005	0.0005
1,2-Dichloroethane	mg/l	< 0.0005	0.0005
1,1-Dichloroethylene	mg/l	< 0.0005	0.0005
trans-1,2-Dichloro- ethylene	mg/l	< 0.0005	0.0005
Dichloromethane	mg/l	< 0.0005	0.0005
1,2-Dichloropropane	mg/l	< 0.0005	0.0005
1,3-Dichloropropylene	mg/l	< 0.0005	0.0005
1,1,2,2-Tetrachloro- ethane	mg/l	< 0.0005	0.0005
1,1,1,2-Tetrachloro- ethane	mg/l	< 0.0005	0.0005
Tetrachloroethylene	mg/l	< 0.0005	0.0005
1,1,1-Trichloroethane	mg/l	< 0.0005	0.0005
1,1,2-Trichloroethane	mg/l	< 0.0005	0.0005
Trichloroethylene	mg/l	< 0.0005	0.0005
Trichlorofluoro- methane	mg/l	< 0.0005	0.0005
Trichloropropane	mg/l	< 0.0005	0.0005
Vinyl chloride	mg/l	< 0.0005	0.0005

Dan Farah

Dan Farah, Ph.D.
Supervisory Chemist

7119

CHAIN OF CUSTODY RECORD

PROJ. NO. PROJECT NAME **BILL COX CADILLAC**
27th and HARRISON OAKLAND, CA

SAMPLERS: (Signature)
Michael Flores Jr.

NO. OF CONTAINERS

TPH/BTEX
~~TPH/BTEX~~
~~TPH/BTEX~~
8010
OF 6000

REMARKS
TAT = ? (call Egan)

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION
1	3/7	9:05			VENT END (WASTE OIL TANK)
2		9:25			FILL END (WASTE OIL TANK)
3		9:45			COMPOSITE (DUMPSTER)
4	✓	10:00			WATER TANK
	1989				

2	X	X	X	X
2	X	X	X	X
2	X	X	X	X
15	X	X	X	X

log
 → In sample 3 see 7/142A

Retinquished by: (Signature)	Date / Time	Received by: (Signature)	Retinquished by: (Signature)	Date / Time	Received by: (Signature)
Retinquished by: (Signature)	Date / Time	Received by: (Signature)	Retinquished by: (Signature)	Date / Time	Received by: (Signature)
Retinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	

R.S. EAGAN & CO.

General Contractors
General Engineering, Process Piping & Electrical



LIC. #476428

150-A MASON CIRCLE
CONCORD, CA 94520
(415) 682-3636

April 12, 1989

Alameda County Health Care Service
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621
ATTENTION: MR. DENNIS BYRNE

RE: Bill Cox Cadillac

Gentlemen:

Following are the preliminary results on soil and water samples taken at the above site on 3-17-89. We have previously reported the soil test results for excavated soil which is currently contained in a soil bin. We are now reporting on two soil and one water sample. The soil samples were taken from a depth of 8' below grade in the area of the former tank fill and vent. The water sample was taken from a temporary storage tank which contains rainfall removed from the excavation prior to re-excavating the area.

The results are as follows:

	<u>SOIL</u>		<u>WATER</u>	
	<u>Fill End</u>	<u>Vent End</u>	<u>Tank</u>	<u>Units</u>
TPH (diesel)	150	48	2.1	PPM
TPH (gasoline)	<.5	45	0.55	PPM
BENZENE	<0.02	<0.02	<0.0004	PPM
TOLUENE	<0.02	0.42	0.00047	PPM
XYLENE	<0.04	1.5	0.018	PPM
ETHYL BENZENE	<0.04	1.2	0.004	PPM
OIL & GREASE	25	<10	10	PPM
8010	ALL<0.05	ALL<0.05	ALL<0.0005	PPM

Based on the above results we intend to:

1. Remove additional soil from tank area and resample at both fill and vent ends

Alameda County Health Care Service
April 12, 1989
Page 2

2. Submit samples for TPH-D, TPH-G, and BTX&E analysis only
3. Obtain predisposal sample on soil stored in roll-off bin for dump site acceptance
4. Make arrangements for disposal of water either through disposal or treatment on site
5. Obtain approval from site owner to initiate a site assessment study.

Please contact us if you have any questions.

Sincerely,

R.S. EAGAN AND COMPANY



Robert S. Corsun
Project Manager

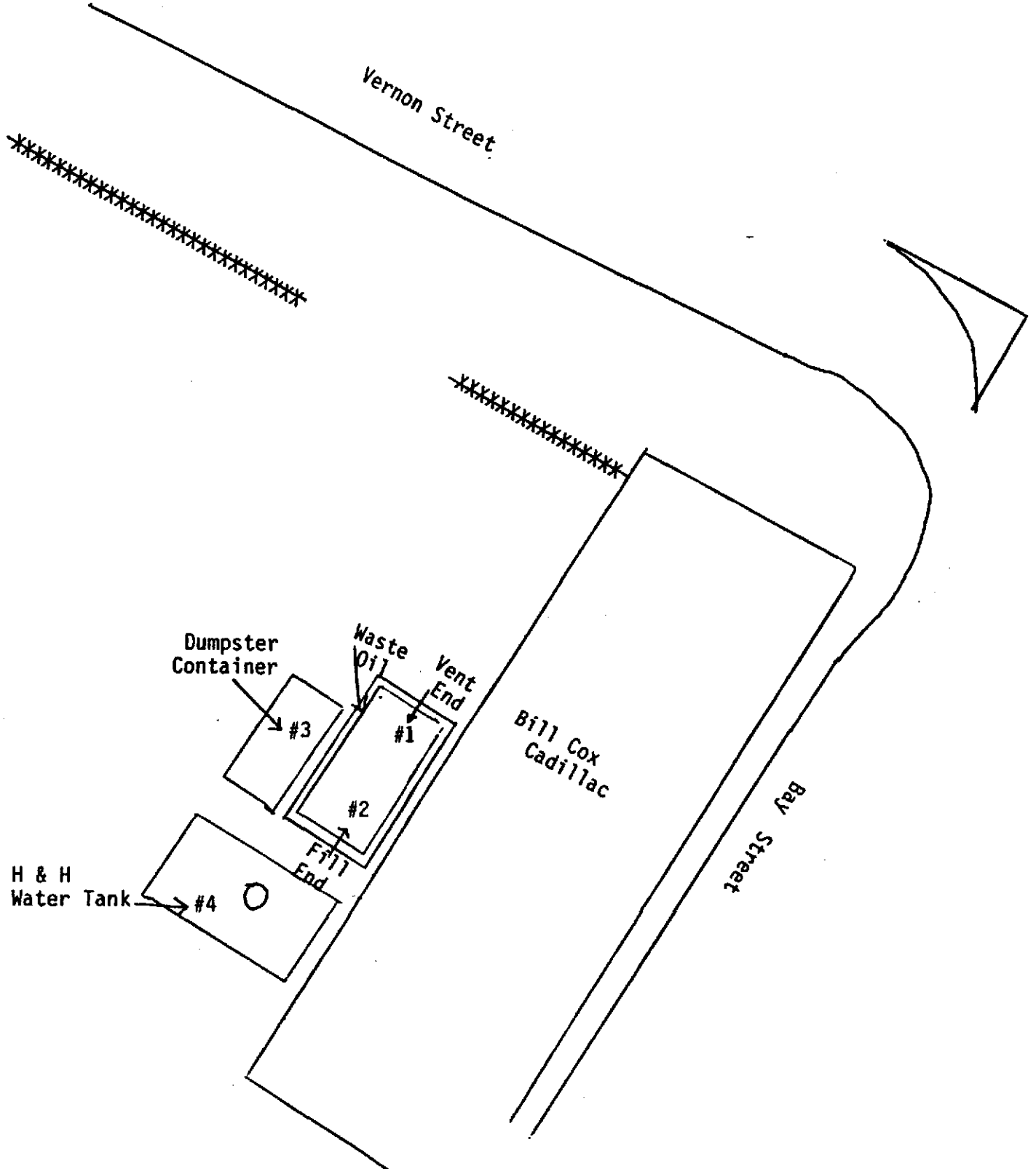
RSC:jj

cc: Mary Ellen Edziak
Wells Fargo Trust
P.O. Box 63939
San Francisco, CA 94163

N



BILL COX CADILLAC
27th and Harrison Street
Oakland, California



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



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

8 March, 1989

Robert Corsun
R.S. Eagan and Company
150-K Mason Circle
Concord, Ca. 94520

RECEIVED
MAR 9 1989

AGENCY HEADQUARTERS
XXXXXX
108 Fifty Street
XXXXXX
Oakland, California 94607
(415) 271-4320

EAGAN & COMPANY

Subject: Underground Tank Removal at 27th Ave and Harrison St.
Oakland.

Dear Mr. Corsun:

Thank you for your letter dated 13 February, 1989. It is the opinion of the Alameda County Department of Environmental Health, Hazardous Materials Division, that further sampling is required at this site to adequately characterize the nature and extent of soil contamination present. This decision is based upon the observation of holes in the tank exterior and the presence of noxious fumes emanating from the excavation during the removal.

We specifically request that the site be reexcavated to a depth of approximately eight feet and samples be collected from each sidewall. In addition, a composite sample should be collected from the soil removed from the pit. The analysis conducted upon these samples should include: Total Petroleum Hydrocarbons-Gasoline and Diesel (methods 5030 and 3550 respectively), Total Oil and Grease (method 503 D&E), Benzene, Toluene, Xylene and Ethylbenzene (method 8020 or 8240) and Chlorinated Hydrocarbons (method 8010 or 8240).

Please inform this office as to when this reexcavation can be scheduled. Dennis Byrne, our inspector overseeing this project would like to be present to observe the sample collection.

If you have any questions concerning this matter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:DB

R. S. EAGAN & L.J.
 150-K Mason Circle
 CONCORD, CALIFORNIA 94520
 (415) 682-3636

LETTER OF TRANSMITTAL

TO Alameda County Department of
Environmental Health
80 Swan Way #200
Oakland, CA 94621

DATE 3-3-89	JOB NO. 8-134
ATTENTION Dennis Byrne	
RE Bill Cox Cadillac	
27th & Harrison, Oakland, CA	

WE ARE SENDING YOU Attached Under separate cover via _____ the following items:

- Shop drawings Prints Plans Samples Specifications
 Copy of letter Change order _____

COPIES	DATE	NO.	DESCRIPTION
1	11-30-88	1	Uniform Hazardous Waste Manifest
1	12-1-88	2	Uniform Hazardous Waste Manifest
1	12-1-88	3	Subsurface Consultants Chain-of-Custody Record
2	12-2-88	4	GTEL Chain-of-Custody Record
1	12-6-88	5	H&H Ship Service, Certificate of Disposal
1	12-8-88	6	GTEL Test Results
2	12-14-88	7	GTEL Test Results
1	2-13-88	8	Letter to Alameda Co. Dept. of Environmental Health

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
 For your use Approved as noted Submit _____ copies for distribution
 As requested Returned for corrections Return _____ corrected prints
 For review and comment _____
 FOR BIDS DUE _____ 19____ PRINTS RETURNED AFTER LOAN TO US

REMARKS Per your conversation today with Bob Corsun, please find attached
copies of reports for the work that has been completed.

Thank you.

COPY TO _____

SIGNED: Robert S. Corsun / RS

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No. _____ Manifest Document No. _____

2. Page 1 of _____ Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
 4. Generator's Phone () _____
 5. Transporter 1 Company Name _____ 6. US EPA ID Number _____
 7. Transporter 2 Company Name _____ 8. US EPA ID Number _____
 9. Designated Facility Name and Site Address _____ 10. US EPA ID Number _____

A. State Manifest Document Number
87907159
 B. State Generator's ID _____
 C. State Transporter's ID _____
 D. Transporter's Phone _____
 E. State Transporter's ID _____
 F. Transporter's Phone _____
 G. State Facility's ID _____
 H. Facility's Phone _____

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol	Waste No.
	No.	Type			
a. _____					State EPA/Other
b. _____					State EPA/Other
c. _____					State EPA/Other
d. _____					State EPA/Other

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
 a. _____
 b. _____
 c. _____
 d. _____

15. Special Handling Instructions and Additional Information

RECEIVED
 DEC 20 1998

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
 If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

EAGAN & COMPANY

Printed/Typed Name _____ Signature _____ Month Day Year _____
 17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name _____ Signature _____ Month Day Year _____
 18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name _____ Signature _____ Month Day Year _____

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
 Printed/Typed Name _____ Signature _____ Month Day Year _____

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-6802; WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR
TRANSPORTER
FACILITY

7118

GENERATOR

TRANSPORTER

FACILITY

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No. **KAC00012591179119177** Manifest Document No. **3789197**

3. Generator's Name and Mailing Address
**Bill Cox CADILLAC
230 Bay Place, Oakland, Ca. 94612**

4. Generator's Phone (**415 451 2400**)

5. Transporter 1 Company Name **H+H SHIP SERVICE CO** 6. US EPA ID Number **KAD0104771168**

7. Transporter 2 Company Name _____ 8. US EPA ID Number _____

9. Designated Facility Name and Site Address **H+H SHIP SERVICE CO
220 CHINA BASIN
SAN FRANCISCO CA 94107** 10. US EPA ID Number **KAD0104771168**

State Generator's ID
State Transporter's ID **9902439**
Transporter's Phone **415 543 6735**
State Transporter's ID
Transporter's Phone
State Facility's ID **38-001-9811**
Facility's Phone **415 543 0906**

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
	No.	Type			
a. EMPTY OILTANK, WASTE COMBUSTIBLE LIQUID NA 1270	02	TP	2000	1000/LB	312 EPA/Other N/A
b. _____	_____	_____	_____	_____	State EPA/Other
c. _____	_____	_____	_____	_____	State EPA/Other
d. _____	_____	_____	_____	_____	State EPA/Other

J. Additional Descriptions for Materials Listed Above
UNDERGROUND STORAGE TANK WITH LESS THAN 1% RESIDUAL LIQUID IN TANK

K. Handling Codes for Wastes Listed Above
a. **01** b. _____ c. _____ d. _____

15. Special Handling Instructions and Additional Information
GLOVES / DRY ICE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **Michael Fraser** Signature **Michael Fraser** Month Day Year **12/9/88**

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name **FRED MORGAN** Signature **Fred Morgan** Month Day Year **12/12/88**

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name _____ Signature _____ Month Day Year _____

19. Discrepancy Indication Space
signed for Wells Fargo Bank.

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name **Cleveland Valley** Signature **Cleveland Valley** Month Day Year **12/9/88**

Subsurface Consultants

STATE OF CALIFORNIA
& ANALYTICAL TEST REQUEST

Project Name: Cadillac, Pat Patterson

SCI Job Number: _____

Project Contact at SCI: _____

Sampled By: SEAN CARSON

Analytical Laboratory: _____

Analytical Turnaround: _____

Sample ID	Sample Type ¹	Container Type ²	Sampling Date	Hold	Analysis	Analytical Method
8e7 N1e7	S	T	12/1/88	_____	_____	_____
S1e7	S	T	12/1/88	_____	_____	_____
W1a	W	V	12/1/88	_____	_____	_____
W2b	W	V	12/1/88	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____

* * * * *

Released by: Sean O Carson Date: 12/1/88

Released by Courier: _____ Date: _____

Received by Laboratory: _____ Date: _____

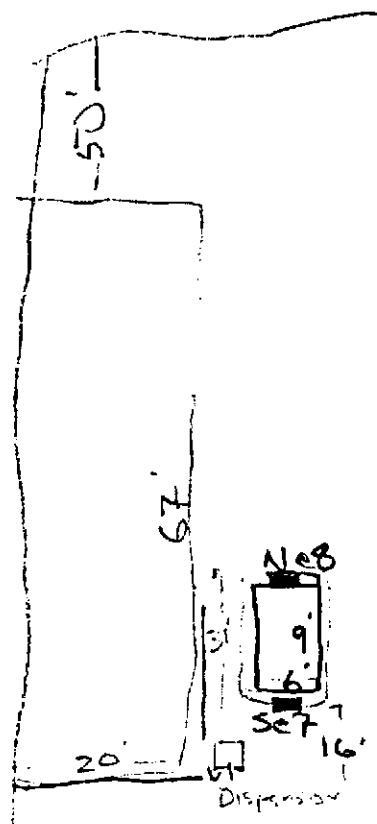
Relinquished by Laboratory: _____ Date: _____

Received by: _____ Date: _____

¹ Sample Type: W = water, S = soil, O = other (specify)
² Container Type: V = VOA, P = plastic, G = glass, T = brass tube, O = other (specify)

Notes to Laboratory:
-Notify SCI if there are any anomalous peaks on GC or other scans
-Questions/clarifications...contact SCI at (415) 268-0461

Pat Paterson
Cadillac
12/1/88



Groundwater
8' below
grade
2000 gallon



100'

180

= BAY

WATER



4080-C Pike Lane
Concord, CA 94520
800-544-3422 (In CA)
415-685-7852 800-423-7143 (Outside CA)

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

001208-1

Project Manager: *Sean Larson* Phone #: *657-3636*

Address: *150 N. Main Street* FAX #: *657-0518*

Project Number: *Q-136 SPB-027-42* Project Name: *Full Box Containment*

Project Location: *7th - Hawaiian* Sampler Signature: *Sean Larson*

ANALYSIS REQUEST **A** OTHER SPECIAL HANDLING

Sample ID	Lab # (Lab use only)	# CONTAINERS	Volume/Amount	Matrix					Method Preserved					Sampling		BTEX (602/8020)	BTEX/TPH as Gasoline (602/8020/8015)	TPH as Diesel (8015 or 8270)	TPH as Jetfuel (8015 or 8270)	Total Oil & Grease (413.1) <i>503.716</i>	Total Oil & Grease (413.2)	Total Petroleum Hydrocarbons (418.1)	EPA 601/8010	EPA 602/8020	EPA 608/8080	EPA 609/8090-PCBs Only	EPA 624/8240	EPA 625/8270	CAM - 17 Metals	EPTOX - 8 Metals	EPA - Priority Pollutant Metals	LEAD(7420/7421/239.2)	ORGANIC LEAD	PRIORITY ONE SERVICE (24 hr)	EXPEDITED SERVICE (2-4 days)	VERBALS/FAX	SPECIAL DETECTION LIMITS (SPECIFY)	SPECIAL REPORTING REQUIREMENTS
				WATER	SOIL	AIR	SLUDGE	OTHER	HCl	HNO ₃	ICE	NONE	OTHER	DATE	TIME																							
<i>N127</i>	<i>D1A</i>	<i>1</i>			<i>X</i>						<i>X</i>		<i>nl</i>			<i>X</i>																						
<i>S127</i>	<i>D2A</i>	<i>1</i>			<i>X</i>						<i>X</i>		<i>nl</i>			<i>X</i>	<i>X</i>																					
											<i>X</i>		<i>nl</i>	<i>3-10 dirty to run</i>																								
											<i>X</i>		<i>nl</i>	<i>HEX/AC</i>																								

Relinquished by:	Date	Time	Received by:
Relinquished by:	Date	Time	Received by:
Relinquished by:	Date	Time	Received by Laboratory:
	<i>12-2</i>	<i>14:15</i>	<i>[Signature]</i>

Remarks:

*Make
8015
TPH Diesel
File
KP 12/6*



W. J. HARRIS

CERTIFICATE OF DISPOSAL

DECEMBER 6, 1988

H & H Ship Service Company hereby certifies to EAGAN & COMPANY
that:

1. The storage tank(s), size(s) ONE (1) 2,000 GALS.

removed from the WELLS FARGO TRUST

facility at 30 BAY PLACE

OAKLAND, CALIFORNIA

were transported to H & H Ship Service Company, 220 China Basin Street,
San Francisco, California 94107.

2. The following tank(s), H & H Job Number: 9178
have been steamed cleaned, cut with approximately 2' X 2' holes,
rendered harmless and disposed of as scrap metal.

3. Disposal site: LEVIN METALS CORPORATION, RICHMOND, CALIFORNIA.

4. The foregoing method of destruction/disposal is suitable for the
materials involved, and fully complies with all applicable regulatory
and permit requirements.

5. Should you require further information, please call (415) 543-4836.

Very Truly Yours,


Cleveland Garrey
Q. A. & Safety Coordinator

220 CHINA BASIN, P.O. BOX 77363 · SAN FRANCISCO, CA 94107 · DAY AND NIGHT: 543-4835





12/08/86mt

RECEIVED
DEC 30 1986

Western Region
4080-C Pike Lane, Concord, CA 94520
(415) 685-7852
(800) 544-3422 from inside California
(800) 423-7143 from outside California

WORK ORD#: 8812048
CLIENT: Bob Consur
R. S. EAGAN & CO.
150- K Mason Circle
Concord, CA 94520
PROJECT#: SFB-0127-39
LOCATION: 27th & Harrison

EAGAN & COMPANY

SAMPLED: 12/01/88 BY: S. Carson
RECEIVED: 12/02/88 BY: E. Larsen
ANALYZED: 12/07/88 BY: R. Condit
MATRIX: Soil
UNITS: mg/Kg (ppm)

TEST RESULTS

PARAMETER	MDL	SAMPLE # I.I.D.	Q1A HIC7'	Q2A SIC7'
Benzene	0.5		<0.5	<0.5
Toluene	0.5		<0.5	<0.5
Ethylbenzene	0.5		<0.5	<0.5
Xylenes	0.5		<0.5	<0.5
Total BTEX	0.5		<0.5	<0.5
Misc. Hydrocarbons (C4-C12)	1		<1	1
Total Petroleum Hydrocarbons as Gasoline	1		<1	1

MDL = Method Detection Limit; compound below this level would not be detected.
Results rounded to two significant figures.

METHOD:
Modified EPA Method 5030/8020/8015

EMMA P. POPEK, Director



12/14/88mt

Page 1 of 1

RECEIVED
DEC 30 1988

Western Region
4080-C Pike Lane, Concord, CA 94520
(415) 685-7852
(800) 544-3422 from inside California
(800) 423-7143 from outside California

WORK ORD#: 8812049
CLIENT: Bob Carson
R.S. EAGAN & CO.
150-K Mason Circle
Concord, CA 94520
PROJECT#: SFB-0127-40
LOCATION: 27th & Harrison

EAGAN & COMPANY

SAMPLED: 12/01/88 BY: S. Carson
RECEIVED: 12/02/88 BY: E. Larsen
ANALYZED: 12/12/88 BY: T. Alusi
MATRIX: Soil R. Lapurga
UNITS: mg/Kg (ppm)

TEST RESULTS

PARAMETER	MDL	SAMPLE #	Q1A	Q2A
		I.I.D.	HIC7'	SIC7'

Total Petroleum Hydrocarbons	5		10	7
------------------------------	---	--	----	---

MDL = Method Detection Limit; compound below this level would not be detected. Results rounded to two significant figures.

METHOD:
APHA Standard Methods 503 D & E

Emma P. Popek
EMMA P. POPEK, Director



Western Region
4080-C Pike Lane, Concord, CA 94520
(415) 685-7852
(800) 544-3422 from inside California
(800) 423-7143 from outside California

12/14/88 rw
WORK ORD# 8812081
CLIENT: Bob Conson
R.S. EAGAN & CO.
150-K Mason Circle
Concord, CA 94520

RECEIVED
DEC 14 1988

PROJECT #: SFB-0127-42
LOCATION: 27th & Harrison

EAGAN & COMPANY

SAMPLED: 12/01/88 BY: S. Conson
RECEIVED: 12/02/88 BY: E. Larsen
ANALYZED: 12/13/88 BY: R. Condit
MATRIX: Soil
UNITS: mg/kg

TEST RESULTS

PARAMETER	MDL	LAB # I.D.#	Q1A H107'	Q2A S107'
Total Petroleum Hydrocarbons as Diesel	10		10	10

MDL = Method Detection Limit.

METHOD: Modified EPA 8015

Emma P. Popek

EMMA P. POPEK, Director

R.S. FAGAN & CO.

General Contractors
General Engineering: Process Piping & Electrical



HC. * 476428

150-K MASON CIRCLE
CONCORD, CA 94520
(415) 682-3636

February 13, 1989

Alameda County Department of Environmental Health
80 Swan Way #200
Oakland, CA 94621
ATTENTION: Mr. Dennis Byrne

RE: Bill Cox Cadillac, 27th & Harrison, Oakland, CA
Job #8-134

Gentlemen:

Following is our report of activities in chronological order for the above mentioned project:

Work was initiated on 11-30-88, Wednesday, with the tank being triple rinsed and pumped and then uncovered in preparation for removal.

Tank cleaning by Bay Area Tank and Marine, Walnut Creek, CA.

Rinsate removal and disposal by Refineries Services, Patterson, CA.

On 12-1-88, Thursday, the tank was removed from the excavation and loaded on a truck for transportation as hazardous waste for further cleaning and eventual disposal as scrap metal.

Tank hauling and dismantling by H&H Ship Service, San Francisco, CA.

Tank scrapped at Levin Metals, Richmond, CA.

After the tank was removed, soil and water samples were taken. At the request of County Health Inspector an Unauthorized Leak Form was submitted. Soil and water samples were taken to State certified lab for analysis.

Samples taken by Subsurface Consultants and Oakland County Health Inspector, Dennis Bryne.

State certified lab, Gtel, Concord, CA.

Alameda County Department of Environmental Health
February 13, 1989
Page 2

After sampling procedures were accomplished, excavation was filled with previously excavated materials and site barricaded to restrict entry.

Unauthorized Release Reporting Form was submitted on 12-06-88.


Initial sample results received 12-07-88. Two soil samples, one from beneath each end of the tank, show non-detectable for TPHG and BTX&E.

Additional results received 12-12-88 and 12-13-88 which gave results for oil and grease and TPHD, respectively. Oil and grease levels are detectable while TPHD levels are not. The levels of contaminants in the water samples could not be found as the samples were rejected by the lab as being too dirty to run.

At this point we would like some guidance as how to further proceed. We would like to consider this job complete based on our soil sample results, but we expect you will require further investigation due to your job site observations.

Sincerely,

R. S. EAGAN AND COMPANY



Robert S. Corsun

RSC:jj

cc: Ms. Mary Ellen Idziack
c/o Wells Fargo Trust
P.O. Box 63939
San Francisco, CA 94163

white - env. health
 yellow - facility
 pink - files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name Bill Cox Cadillac Today's Date RJ 1/1/88
 Site Address 27th + Harrison EPA ID# _____
 City Oakland Ca Zip 94604 Phone 451-2400

MAX Amt. Stored > 500lbs/55g/200cf? Y N
 Hazardous Waste generated per month? _____

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

- I.A. GENERATOR (Title 22)**
- 1. Waste ID * 66471
 - 2. EPA ID 66472
 - 3. > 90 days 66508
 - 4. Label dates 66508
 - 5. Biennial 66493
-
- Manifest**
- 6. Records 66492
 - 7. Correct 66484
 - 8. Copy sent 66492
 - 9. Exception 66484
 - 10. Copies Rec'd 66492
-
- Misc.**
- 11. Treatment 66371
 - 12. On-site Disp. (H.S.&C.) 26189.5
 - 13. Ex Haz. Waste 66570
-
- Prevention**
- 14. Communications 67121
 - 15. Aisle Space 67124
 - 16. Local Authority 67126
 - 17. Maintenance 67120
 - 18. Training 67105
-
- Confin. Geny.**
- 19. Prepared 67140
 - 20. Name List 67141
 - 21. Copies 67141
 - 22. Emg. Coord. Tmg. 67144
-
- Containers, Tanks**
- 23. Condition 67241
 - 24. Compatibility 67242
 - 25. Maintenance 67243
 - 26. Inspection 67244
 - 27. Buffer Zone 67246
 - 28. Tank Inspection 67259
 - 29. Containment 67245
 - 30. Safe Storage 67261
 - 31. Freeboard 67257

Comments:

Observed the removal of 1 3,000 gallon tank used for waste oil - previous use was for diesel

A strong hydrocarbon odor was detectable from the excavated soil

A note from fire inspector was present to indicate his satisfaction that the tank was safe for removal

Flaming product observed on water in bottom of excavation.

Obvious holes observed in side of tank

Unauthorized Release Report Requested ^{with in} 5 days

Water sample collected

Soil samples from either end of tank from - depth of approx 8'

Analysis requested Low TPH, BTX+E 8020 and oil grease 503 D+E

Excavated soil to be returned to owner with supporting analysis

- I.B. TRANSPORTER (Title 22)**
- 32. Applic./Insurance 66428
 - 33. Comp. Cert./CHP Insp. 66448
 - 34. Containers 66465
-
- Manifest**
- 35. Vehicles 66465
 - 36. EPA ID #s 66531
 - 37. Correct 66541
 - 38. HW Delivery 66543
 - 39. Records 66544
-
- Confin's**
- 40. Name/ Covers 66545
 - 41. Recyclables 66800

Rev 6/88

Contact: _____

Title: _____

Signature: Dennis B. ...

Inspector: D. Byrne

Signature: Cowan Byrne

ADDRESS 30. Bay Place

NAME R.S. EGAN + Co

GENERAL INSPECTION PERMIT OTHER HAZARD NOTED HAZARD ABATED

NOTICE LEFT LETTER 1st NOTICE 2nd NOTICE FINAL

DATE	VIOLATION	O.F.C.	CONTACTED
12/1/88	Recovery oil tank OK to be pulled		
	LEL to be below 10		

A REINSPECTION WILL BE MADE WITHIN _____ DAYS.

FIRE PREVENTION BUREAU - PHONE 272-3851

INSPECTOR Gordon Gullett

TANK REMOVAL CHECK LIST

OWNER Wells Fargo Bank
ADDRESS 27th Harrison (30 Bay Place)
CITY Oakland, CA
ENGINEER M.E. Deak

TANK SIZES

PERMITS

ENVIRONMENTAL HEALTH Dennis ~~Beane~~ Beane 1 pm Thursday

FIRE DEPARTMENT WSP. Gullett

EMPTY TANKS

DRY ICE

EXCAVATOR- C.B.C. Backhoe - Late Morning 11/30/88 1 pm. Thursday 12/1/88

DUMP TRUCK

DUMP SITE

CRANE

SOIL SAMPLES

TANK DISPOSAL

TANK HAULING: 1 pm 12/1/88

BACKFILL

SAND/GRAVEL

PATCH CONCRETE

PATCH ASPHALT

R. S. EAGAN & ().
 150-K Mason Circle
 CONCORD, CALIFORNIA 94520
 (415) 682-3636

shepard
 LETTER OF TRANSMITTAL

DATE	12-06-88	JOB NO.	8-134
ATTENTION	Mr. DAVID BYRNE		
RE	Bill Coe CADILLAC TANK Removal		
DEC - 5 AM 1:13			

TO ALAMEDA COUNTY HEALTH CARE SERVICES
80 Susan Way, Rm 200
OAKLAND, CA 94621

WE ARE SENDING YOU Attached Under separate cover via _____ the following items:

- Shop drawings Prints Plans Samples Specifications
 Copy of letter Change order RELEASE FORM

COPIES	DATE	NO.	DESCRIPTION
1	12-06-88	1	UNAUTHORIZED RELEASE REPORTING FORM

Alameda County
 JUN 16 2003
 Environmental Health

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
 For your use Approved as noted Submit _____ copies for distribution
 As requested Returned for corrections Return _____ corrected prints
 For review and comment _____
 FOR BIDS DUE _____ 19 _____ PRINTS RETURNED AFTER LOAN TO US

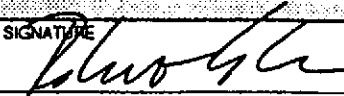
REMARKS _____
WE EXPECT RESULTS OF SOIL SAMPLING NEXT WEEK

R0148
 ATT. TO 00/13/03 PES LTR *[Signature]*

COPY TO _____

SIGNED: BOB CORSON

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE.		
REPORT DATE 1 <u>M</u> 2 <u>M</u> 0 <u>D</u> 5 <u>D</u> 8 <u>Y</u> 8 <u>Y</u>		CASE #		SIGNED _____ DATE _____		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT <u>Robert S. Corsun</u>		PHONE <u>(415) 682-3636</u>		SIGNATURE 	
	REPRESENTING <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER <u>Contractor</u>		COMPANY OR AGENCY NAME <u>R.S. Eagan and Company</u>			
	ADDRESS <u>150-K Mason Circle</u> <u>Concord</u> <u>CA</u> <u>94520</u>					
RESPONSIBLE PARTY	NAME <u>Wells Fargo Bank Trustee for Harold Sheppard Trust</u> <input type="checkbox"/> UNKNOWN		CONTACT PERSON <u>Mary Ellen Idziak</u>		PHONE <u>(415) 396-6742</u>	
	ADDRESS <u>525 Market Street, 17th Floor</u> <u>San Francisco</u> <u>CA</u> <u>94163</u>					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) <u>Bill Cox Cadillac</u>		OPERATOR <u>Frank Jessup</u>		PHONE <u>(415) 451-2400</u>	
	ADDRESS <u>30 Bay Place</u> <u>Oakland</u> <u>Alameda</u> <u>94604</u>					
	CROSS STREET <u>27th & Harrison</u>		TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> OTHER <u>mixed</u>		TYPE OF BUSINESS <input type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input checked="" type="checkbox"/> OTHER <u>Auto Dealer</u>	
	LOCAL AGENCY <u>Alameda County Health Care</u>		AGENCY NAME <u>Alameda County Health Care</u>		CONTACT PERSON <u>Dennis Byrne</u>	
IMPLEMENTING AGENCIES	REGIONAL BOARD		PHONE <u>(415) 271-4320</u>		PHONE <u>()</u>	
SUBSTANCES INVOLVED	(1) NAME <u>Diesel Fuel</u>		QUANTITY LOST (GALLONS) <u> </u> <input checked="" type="checkbox"/> UNKNOWN			
	(2) NAME <u>Waste Motor Oil</u>		QUANTITY LOST (GALLONS) <u> </u> <input checked="" type="checkbox"/> UNKNOWN			
DISCOVERY/ABATEMENT	DATE DISCOVERED <u>1 M 2 M 0 D 1 D 8 Y 8 Y</u>		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER			
	DATE DISCHARGE BEGAN <u> </u> <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER			
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE <u>1 M 2 M 0 D 1 D 8 Y 8 Y</u>					
SOURCE/CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		TANKS ONLY: CAPACITY <u>3,000</u> GAL AGE _____ YRS <input checked="" type="checkbox"/> UNKNOWN		MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER	
	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER					
CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)					
CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input checked="" type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES					
REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)					

COMMENTS: Tank has been removed and source of leak eliminated. Samples are into lab for analysis. Expect results mid-December 1988.

Shepard

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25801 OF THE HEALTH AND SAFETY CODE. SIGNED: _____ DATE: _____
REPORT DATE 1st 2nd 0d 5d 8y 8	CASE #	

REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Robert S. Corsun	PHONE (415) 682-3636	SIGNATURE <i>Robert S. Corsun</i>
	REPRESENTING <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER Contractor	COMPANY OR AGENCY NAME R.S. Eagan and Company	
	ADDRESS 150-K Mason Circle Concord CA 94520		

RESPONSIBLE PARTY	NAME Wells Fargo Bank Trustee for Harold Sheppard Trust <input type="checkbox"/> UNKNOWN	CONTACT PERSON Mary Ellen Idziak	PHONE (415) 396-6742
	ADDRESS 588 Market Street, 17th Floor San Francisco CA 94163		

SITE LOCATION	FACILITY NAME (IF APPLICABLE) Bill Cox Cadillac	OPERATOR Frank Jessup	PHONE (415) 451-2400
	ADDRESS 30 Bay Place Oakland Alameda 94604		
	CROSS STREET 27th & Harrison	TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input checked="" type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> OTHER mixed	TYPE OF BUSINESS <input type="checkbox"/> FARM <input checked="" type="checkbox"/> OTHER Auto Dealer

IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care	AGENCY NAME	CONTACT PERSON Dennis Byrne	PHONE (415) 271-4320
	REGIONAL BOARD			PHONE ()

SUBSTANCES INVOLVED	(1) NAME Diesel Fuel	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN
	(2) NAME Waste Motor Oil	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN

DISCOVERY/ABATEMENT	DATE DISCOVERED 1 2 0 1 8 y 8	HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 1 2 0 1 8 y 8	

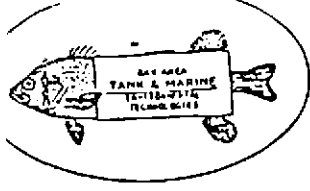
SOURCE/CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER	TANKS ONLY CAPACITY 3,000 GAL AGE _____ YRS <input checked="" type="checkbox"/> UNKNOWN	MATERIAL <input checked="" type="checkbox"/> FIBERGLASS <input type="checkbox"/> STEEL <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER
--------------	--	---	--	---

CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
-----------	--

CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input checked="" type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES
----------------	--

REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (MJ) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)
-----------------	--

TANK HAS BEEN REMOVED AND SOURCE OF LEAK ELIMINATED. SAMPLES ARE INTO LAB FOR ANALYSIS. EXPECT RESULTS MID-DECEMBER 1988.



JOB NAME	<i>Cold Ice Cont Wellstargo</i>	FIELD LOG
CUSTOMER NAME	<i>R. Lopez Charac Co.</i>	MF
PROJECT MANAGER	<i>Bob Conner</i>	Date <i>11/30/88</i>
Job Location	<i>9999 San Leandro St & 30 Bay Place</i>	Job No.
Service Performed	<i>7 hrs cleaning</i>	Phase No.
Prepared by: <i>ZGC</i>		

- EQUIPMENT AND MATERIAL -

PROD. CODE	DESCRIPTION	UOM	QTY	RATE	DESCRIPTION	UOM	QTY	RATE	
	2" SCH. 40 PVC SOLID PIPE	L.F.							
	2" SCH. 40 PVC SLOTTED PIPE	L.F.							
	2" PVC CAPS	EA.							
	2" PVC PLUGS	EA.							
	2" PVC PLUG ADAPTER	EA.							
	2" PVC COUPLINGS	EA.							
	CHRISTY BOX W/C. I. COVER	EA.							
	DRY MIX CONCRETE, 90 LBS.	SX.							
	SAND, 100 LBS.	SX.							
	ASPHALT	SX.							
	BENTONITE, 50 LBS.	EA.							
	SAMPLE BOTTLE, 40CC VOA	EA.			DESCRIPTION OF WORK <i>Washed tanks at 2 locate in Oakland</i>				
	SAMPLE BOTTLE, PINT (GLASS)	EA.							
	LONG SAMPLER	EA.							
	SHORT SAMPLER	EA.							
	GX-3A METER	EA.	1	25.00					
	LEVEL	EA.							
	FLOWMETER	EA.							
	METAL DETECTOR	EA.							

VEHICLE	HRS.	<i>8.5</i>		
SERVICES	YES	<i>8</i>	NO	
EXPENSES	YES		NO	<i>✓</i>

- ADDITIONAL ITEMS -

PRODUCT	DESCRIPTION	QTY	PRODUCT	DESCRIPTION	UOM
<i>8</i>	<i>hours service at 40.00</i>	<i>320.00</i>			
<i>1</i>	<i>day vehicle at 50.00</i>	<i>50.00</i>			
<i>1</i>	<i>day GX-3 use</i>	<i>25.00</i>			

SAFETY FIRST

RECEIVED BY

Company Representative

Total 395.00

197.50

RECEIVED
DEC 1988

RECYCLETRON OIL, INC.
DBA Refineries Service

P.O. Box 1171
Patterson, CA 95363
(209) 892-6742
(800) 874-4444

87907159
STATE MANIFEST #
USED OIL HAULER # 86-050
EPA # CAD083166728
HAZARDOUS WASTE HAULER # #1500
REGISTRATION #
INV. # 7540

Job Site:
EAGAN & COMPANY
Bill Cox Cad. Mac
30 Bay Place
Oakland, Ca.

11-30-88
DATE

CUSTOMER	NAME	682-3636	TRUCK #	
	ADDRESS	BILLING ADDRESS IF DIFFERENT	DRIVER	
	CITY STATE ZIP	CITY STATE ZIP	TERMS	
	PHONE		PO #	

Wells Fargo
525 Market ST.
S.F. Ca. 396-6740
R.S. Eagan
150 E Mason Circle
Concord, Ca. 94545

- PLEASE PAY FROM THIS INVOICE -

PRODUCT	GALLONS	HOURS	RATE	AMOUNT
WASTE OIL x H ₂ O	300		1.55 ⁰⁰	165.00
LABOR 2 HOURS			55 ⁰⁰	110.00

I certify amount shown above to be correct.

David Kemp
(Customer Signature)

[Signature]
(Driver Signature)

WHITE: CUSTOMER CANARY: ALPHABETICAL PINK: NUMERIC GOLDENROD: FILE

Total Charges 275.00

Spoke w/ Mary - She will send copy of manifest report today. Also I request they send report w/ invoice in the future

12-23-88

[Signature]

CITY OF OAKLAND
FIRE MARSHAL'S OFFICE
ROOM 201, CITY HALL
OAKLAND, CALIFORNIA 94612
273-3851

Permit No.	_____
Copies to	_____
Date Issued	_____

APPLICATION for PERMIT to INSTALL, REMOVE or REPAIR TANKS
IN THE CITY OF OAKLAND

Date 11/07/88

Application is hereby made for permit to remove gasoline tank and excavate, commencing four feet inside the curb line
install fuel oil tank and excavate, commencing inside the property line
repair

on the EAST side of Harrison St. Ave. 100 feet North of 27th St.

House No. and Street 30 BAY PLACE Street Avenue Present storage Currently Spilling Waste Oil

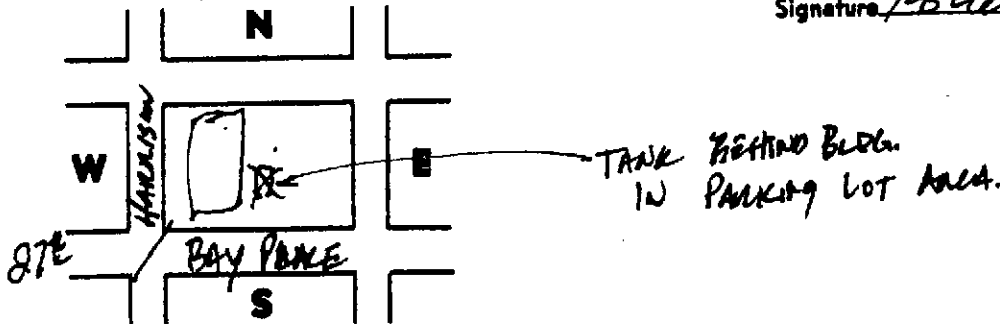
Owner WELLS FARGO BANK Address P.O. Box 63909 SF. 94163 Phone (415) 396-6742

Applicant R.S. EAGAN & Co Address 150-K Mason Creek Concord 97020 Phone (415) 682-3636

Remarks TANK 10 IN SERVICE AREA PARKING LOT (CAR STORAGE)

Sidewalk surface to be disturbed N/A Number of Tanks 1 Capacity 3000 Gallons each ASCOMMO

Signature [Signature]



Excavation Permit Granted _____ No. _____

CITY OF OAKLAND

Permit to Excavate and Install, Repair, or Remove Inflammable Liquid Tanks. No. 9172

Oakland, California _____ November 9, 1988 _____

PERMISSION IS HEREBY GRANTED TO REMOVE AND REPAIR _____ foot _____

Street _____
 Address _____

Street _____
 Address _____

_____ 30 Bay Place _____
 _____ P. O. Box _____ Phone _____

_____ E. S. Egan & Company _____
 Address _____ Phone _____

Number of _____
 _____ Dollars, each.

This permit is granted in accordance with existing City Ordinances.
 Owner hereby agrees to remove tanks on discontinuance of use or when notified by the City authorities.
 When installing, removing or repairing tanks, no open flame to be on or near permit.

By _____ Fire Marshal

By _____ Drainage Division Engineering Dept.

EXCAVATING PERMIT

Issued in accordance with Ord. No. 278 CMS, Sec. 6-2.04

_____ square feet of digging or removal granted.

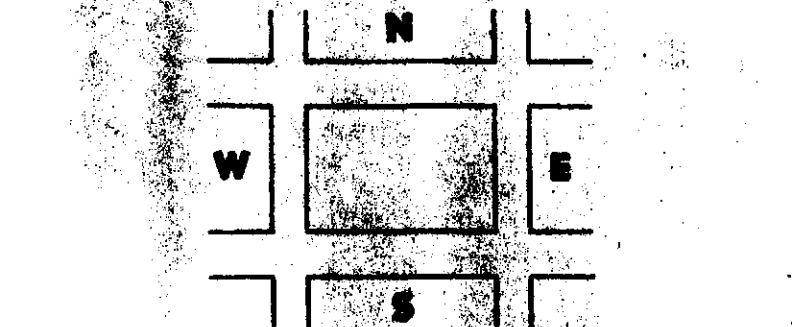
The receipt of \$ _____ special deposit is hereby acknowledged.

GENERAL DEPOSIT.

BUREAU OF PERMITS AND LICENSES.

Inspection Fee Paid \$ 50.00 ck#7698 rec#607131

Received by G. M. Johnson
 FIRE PREVENTION BUREAU



CERTIFICATE OF TANK AND EQUIPMENT INSPECTION

Inspected and passed on _____ 19____

By _____ Fire Marshal

NOTICE

Before Covering Tanks, Above Certificate Must Be Signed.

When ready for inspection notify Fire Prevention Bureau, 273-3851

THIS PERMIT MUST BE LEFT ON THE WORK AS AUTHORITY THEREFOR.

R. S. EAGAN & CO.
 150-K Mason Circle
 CONCORD, CALIFORNIA 94520
 (415) 682-3636

LETTER OF TRANSMITTAL

DATE	10-25-88	JOB NO.	88-133 & 88-134
ATTENTION	Dennis Byrne		
RE:	27th & Harrison, Oakland, and 9999 San Leandro Street, Oakland, projects for Wells Fargo		

TO Alameda County Health Department
80 Swan Way, Room 200
Oakland, California 94621

WE ARE SENDING YOU Attached Under separate cover via _____ the following items:

- Shop drawings Prints Plans Samples Specifications
 Copy of letter Change order _____

COPIES	DATE	NO.	DESCRIPTION
3			Health and Safety Plans for each jobsite
1			Underground tank closure/modification plans for 27th and Harrison jobsite

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
 For your use Approved as noted Submit _____ copies for distribution
 As requested Returned for corrections Return _____ corrected prints
 For review and comment _____
 FOR BIDS DUE _____ 19 _____ PRINTS RETURNED AFTER LOAN TO US

REMARKS _____

COPY TO _____

SIGNED: Bob Corsun

R.S. EAGAN & CO.

General Contractors
General Engineering, Process Piping & Electrical

LIC. # 476428

150-N MASON CIRCLE
CONCORD, CA 94520
(415) 682-3636

HEALTH AND SAFETY PLAN

BACKGROUND INFORMATION

Owner: Wells Fargo Bank

Project title: Bill Cox Cadillac

Site address: 27th and Harrison
Oakland, California

Owner's representative: Mary Ellen Idziak

Scope of work: Tank removal and pavement replacement

Working hours: 7:00 A.M. to 4:00 P.M.

Site description: Tank located beneath asphalt paving in fenced parking area for offices of medium industrial building used for automobile sales and repair

Current uses: Tank is currently used for waste oil storage, although original purpose appears to have been diesel fuel

Tanks to be removed: Assumed to be one 3,000-gallon steel tank

Disposition of residual tank contents: Tank interior will be cleaned using a high-pressure, hot water blaster (3,000 psi). Before, during, and after cleaning the tank contents will be pumped out by a vacuum truck operated by Refineries Services

Disposition of tank: *A&H SHIP SERVICE*
Tank will be hauled by ~~R.S. Eagan & Company~~ flatbed truck to ~~Triagle of California, West Sacramento, California, for disposal~~
THEIR FACILITY AT 220 CHINA BAY ST. IN SAN FRANCISCO FOR eventual disposal AS SCRAP STEEL.

HAZARDS - DESCRIPTION,
PROTECTION, AND MONITORING

The following materials are known to be stored currently in the tanks to be removed:

<u>Substance</u>	<u>Physical state</u>	<u>TLV</u>	<u>Exposure characteristics</u>
Waste oil	Liquid/vapor	not estab.	Irritant to skin, eyes, lungs

All Sites: Demolition equipment - backhoes, hydraulic breaker, dump trucks, concrete saw, air compressor, jackhammers
Removal equipment - backhoes, cranes, flatbed trucks
Backfilling equipment - backhoes, vibratory compaction equipment, dump trucks

Potential physical hazards onsite: Buried utilities; unstable soil conditions

Overall hazard estimation: Low

Personal protective equipment: Work areas, during removal processes are designated no eating, drinking or smoking

Level of protection: D

Equipment to be used: Hard hats, eye protection, hearing protection, long sleeve shirts and pants, leather boots with steel toes and gloves (optional)

When to use: During all work operations

Direct Reading Monitoring Equipment

Equipment: Gas Tech 1314 combustible gas meter

Location for use: Tank atmosphere/excavation

When used: Periodically throughout tank removal

Action Levels for Monitoring Results

Equipment: Combustible gas meter

Action level: Tank - if tank atmosphere exceeds 20% of L.E.L., add additional dry ice. Do not remove tank until atmosphere is less than 10% of L.E.L.

Flash Points and Flammable Concentration

<u>Material</u>	<u>Flash Point</u>	<u>Flammable Range (% in air)</u>
Waste oil	>200	not applicable

On-Site Organization and Coordination

The following personnel are designated to carry out noted job site functions:

Project superintendent: Jim Nichols
Backhoe operation: C.B.C. Backhoe, Bill Cleaver
Tank hauling: R.S. Eagan & Company
City representative: Fire Prevention
County representative: Health Services Inspector

Site Control

Control unauthorized entry of work site by use of barricades and construction tape flagging

Emergency Medical Care and Procedures

Nearest medical facility (24-hour emergency medical): Merritt Hospital
547-1700
350 Hawthorne Avenue, Oakland, California

Emergency telephone numbers: Fire 911
Police 911
Ambulance 911

Emergency First Aid for Materials Present

<u>Substance</u>	<u>Exposure Symptoms</u>	<u>First Aid</u>
Waste oil-dermal	Burning eyes, skin dehydration	Flush with water for 15 minutes
Waste oil-ingested	Irritation of stomach and intestines, nausea and vomiting	<u>Do not induce vomiting</u> , transport to Merritt Hospital

Protective Equipment Onsite (Levels C and Level D)

Level C: Air-purifying respirator, half-face organic vapor cartridges; disposable chemical-resistant coveralls; gloves - inner and outer (chemical-resistant); boots - chemical-resistant, steel toe and shank; hard hat with face shield

First Aid Equipment Onsite

<u>Equipment</u>	<u>Location</u>
First aid kit	R.S. Eagan truck
Fire extinguisher	Within 20' of work area
Emergency eye wash	R.S. Eagan truck

Onsite Emergency Procedures

1. Personal injury or illness: administer first aid; call ambulance, if necessary; transport to Merritt Hospital, 350 Hawthorne Avenue, Oakland, California
2. Fire or explosion: turn off all motorized equipment; evacuate working area; meet at designated up-wind location
3. Earthquake: turn off all motorized equipment; evacuate working area; meet at designated up-wind location
4. Hazardous material spill or release: turn off all motorized equipment; evacuate work area in an upwind direction of the spill or release; meet at designated up-wind location

5. Personal protective equipment failure: if any site worker experiences a failure or alteration of protective equipment that affects the protection factor, that person and his/her buddy shall immediately leave the Exclusion Zone. Reentry shall not be permitted until the equipment has been repaired or replaced
6. Other equipment failure: if any other equipment onsite fails to operate properly, the project team leader and site safety officer shall be notified and then shall determine the effect of this failure on continuing operations onsite. If the failure affects the safety of personnel or prevents completion of the work plan tasks, all personnel shall leave the Exclusion Zone until the situation is evaluated and appropriate actions taken

AUTO
SHOW ROOM

OFFICES

SERVICE AREA

EXISTING GAS
TANK
TO REMAIN.

GAS pump

PARTS STORAGE

Diesel Fuel Pump

TANK BOTTOM 118" BELOW GRADE

Riser Ht. 43"

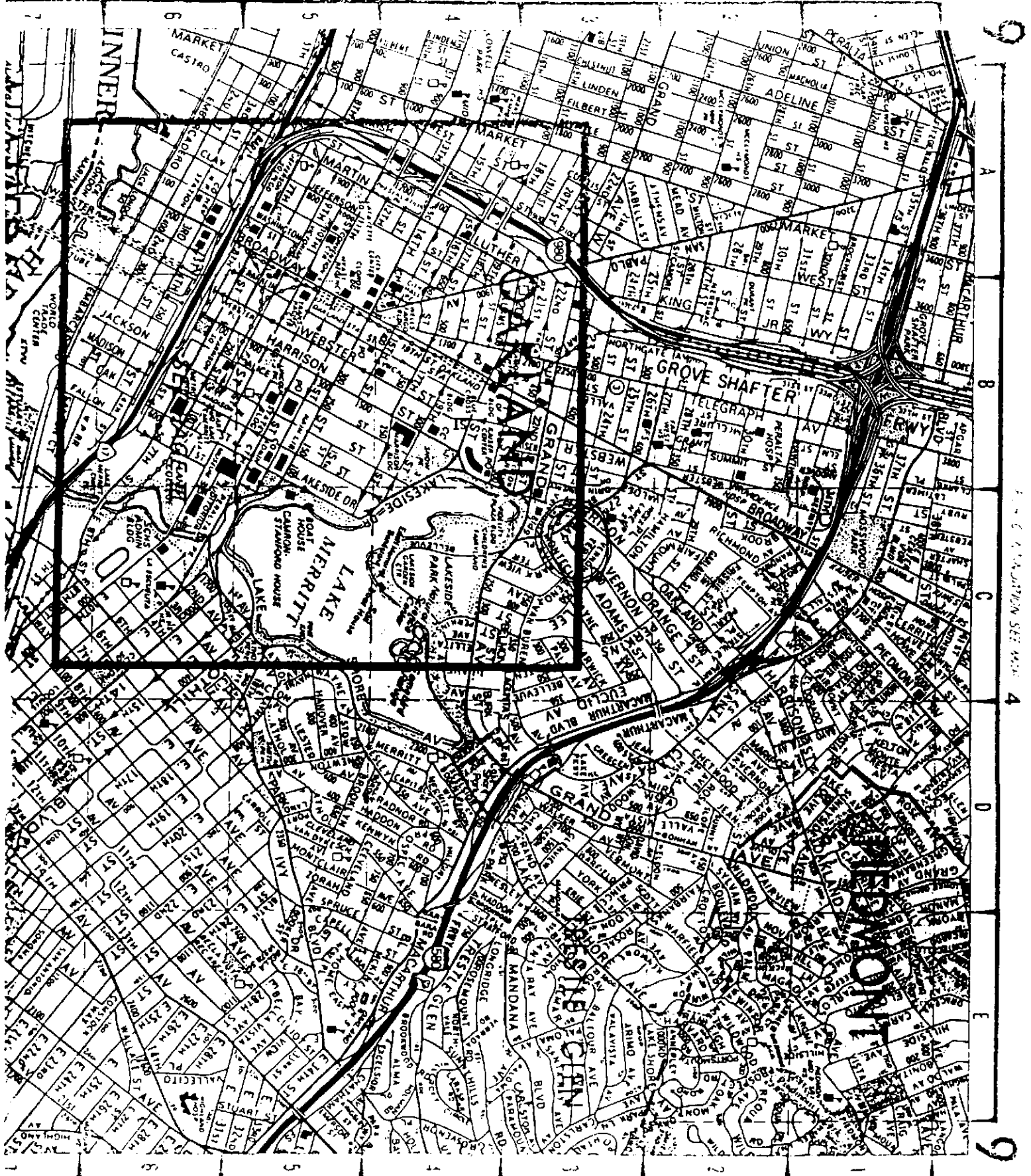
TANK DIA. 75"

CURRENT CONTENTS 16" WASTE OIL 8/17/08

BILL COX CADILLAC
WELLS FARGO TRUST.

27' 1/2"

6



A
B
C
D
E

1
2
3
4
5

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 415/271-4320

RECEIVED
 OCT 09 1988

EAGAN & COMPANY

Project # U528725
 Fee Paid \$300.00
 Date 10/21/88

ACCEPTED

6A
 11/3/88
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 470 - 27th Street, Third Floor
 Oakland, CA 94612
 Telephone: (415) 574-7737

These plans have been reviewed and found to be acceptable and generally meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. The project proposed herein is now related to the issuance of any permit or other regulatory action. One copy of these accepted plans must be on file and available to all contractors and shall remain in accordance with the removal.

Any change or amendment of these plans and specifications must be submitted to the Director and shall be in the form of Billings. Inspection Department is authorized to determine if changes meet the requirements of State and local laws. Notify the Department at least 48 hours prior to the following required inspections:

- _____ Removal of soil and filling
- _____ Compaction
- _____ Final inspection

There is a financial responsibility section on page 2 of the permit to operate. It is required on certain plans with special plans and all applicable regulations. CONTACT THE CONTRACTOR FOR MORE INFORMATION.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name Cold Ice C - Bill Cox Cadillac
 Business Owner Wells Fargo Bank. Bill Cox
2. Site Address 27th + Harrison
 City Oakland CA Zip 94607¹² Phone 451-2400
3. Mailing Address Same
 City _____ Zip _____ Phone _____
4. Land Owner Wells Fargo Bank, Trust Real Estate Dept.
 Address P.O. Box 63939 City, State S.F., CA Zip 94163
5. EPA I.D. No. OWNER will apply for - LAC 000125917
6. Contractor R.S. Eagan & Co.
 Address 150-K MASON CIRCLE
 City CONCORD, CA Zip 94520 Phone 682-3636
 License Type A,B,C-8,C-10,C-61 ID# 476428
7. Consultant _____
 Address _____
 City _____ Phone _____

8. Contact Person for Investigation

Name ROBERT CORSUN Title Project Mgr.
Phone 682-3636

9. Total No. of Tanks at facility 1

10. Have permit applications for all tanks been submitted to this office? Yes [] No []

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name REFINERIES SERVICE, INC. EPA I.D. No. CAD 083166728
Address 13331 NORTH Hwy 33
City PATTERSON State CA Zip 95363

b) Rinsate Transporter

Name - SAME AS ABOVE - EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank Transporter H + H Ship inc

Name R.S. EAGAN to haul EPA I.D. No. _____
Address TANK AS NON-HAZARDOUS WASTE
City _____ State _____ Zip _____

d) Tank Disposal Site

Name TRIANGLE INC. OF CALIF. EPA I.D. No. _____
Address P.O. Box 9795
City SACRAMENTO State CA Zip 95823

e) Contaminated Soil Transporter

Name NONE ANTICIPATED EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

12. Sample Collector

Name Jim Nichols OR DENNIS CARDENAS
 Company R.S. EAGAN & Co.
 Address 150-K MASON CIRCLE
 city CONCORD State CA zip 94520 Phone 682-3636

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
3000 gal.	WASTE OIL (CURRENTLY) DIESEL FUEL (IN PAST)	SOIL	EACH END OF TANK AT BACKFILL/NATIVE SOIL INTERFACE

14. Have tanks or pipes leaked in the past? Yes [] No []

If yes, describe. UNKNOWN

15. NFPA methods used for rendering tank inert? Yes No []

If yes, describe. TANK TO BE TRIPLE RINSED USING HOT HIGH PRESSURE BLASTER. IF LEL PRESENT ADD DRY ICE IN QUANTITY 15 LB/1000 GALLON CAPACITY
 An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name G.T.E.L
 Address 4080 UNIT C
 city CONCORD State CA zip 94520
 State Certification No. 194

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
WASTE OIL ↓ DIESEL FUEL	TPH AS GASOLINE TPH AS DIESEL OIL & GREASE BTX TE	GC FID (5030) 503 DIE 8020

18. Submit Site Safety Plan

19. Workman's Compensation: Yes No

Copy of Certificate enclosed? Yes No

Name of Insurer NATIONWIDE INSURANCE CO.

20. Plot Plan submitted? Yes No

21. Deposit enclosed? Yes No \$300

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

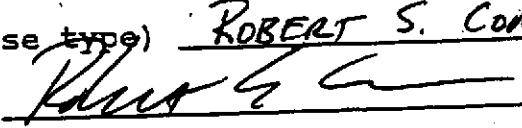
I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin 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 will notify the Department of Environmental Health at least two (2) working days (48 hours) in advance to schedule any required inspections. 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.

Signature of Contractor

Name (please type) ROBERT S. CONNOR

Signature 

Date 10/10/88

Signature of Site Owner or Operator

Name (please type) _____

Signature _____

Date _____

NOTES:

1. Any changes in this document must be approved by this Department.
2. Any leaks discovered must be submitted to this office on an underground storage tank unauthorized leak/contamination site report form within 5 days of its discovery.
3. Three (3) copies of this plan must be submitted to this Department. One copy must be at the construction site at all times.
4. A copy of your approved plan must be sent to the landowner.

PERMIT

44750

8134

104 MAC B C 01E 1 11 882-3800
021000 01A 1110

WONCO B. CA 01 20
02100 1111

10/19/88

\$\$\$

Florida County Water

NOT NEGOTIABLE

01 11 882-3800 02100 1111

REF./
A/C NO.

COUNTY OF ALAMEDA
OFFICE OF THE AUDITOR-CONTROLLER

DATE: 10 / 21 / 88

RECEIVED

9528725

MISCELLANEOUS RECEIPT OCT 25 1988

\$ 300.00

removal

EAGAN & COMPANY

DOLLARS

RECEIVED FROM: R. S. Eagan and Co. Concord 94520
150-K Mason Circle

FOR: Bill Cox Cadillac
27th & Harrison Oakland 94612

RECEIVED BY: Mrs. Antonette B. Mendez DEPT. NO.: 430-4530

CASH PERSONAL/CASHIER'S CHECK/M. O. # 7643 OTHER:

110-1 (Rev 10/85) [0134E (08)] 3-Part

Distribution: White - Payor Yellow & Pink - Depart.

R. S. EAGAN & CO.

7643

PERMIT 44750 8134

act # 1525125
Fee Paid \$300.00
Date 10/21/88

Project # _____
Fee _____
Dist. _____

27th & Harrison
Oakland Ca 94612