

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 10, 2006

Mr. John Williamson  
John's Mobil  
1511 Wellington Street  
Oakland, CA 94602-1715

Dear Mr. Williamson

Subject: Fuel Leak Case Number RO0000159, Mobil, 3635 13<sup>th</sup> Avenue, Oakland, CA

Alameda County Environmental Health (ACEH) staff have reviewed the case file and the report titled "Remedial Investigation and Interim Corrective Action Plan," prepared by AEI Consultants and dated July 19, 2004. The scope of work as described in the Work Plan indicates that seven onsite soil borings are proposed to define the lateral and vertical extent of contamination within the source area, with two or three of the soil borings to be converted into onsite monitoring wells. In addition, AEI proposes an interim corrective action pilot test of chemical oxidation by ozone sparging as a means to enhance the degradation of petroleum hydrocarbon in the source area. ACEH generally agrees with the scope of work as proposed in the Work Plan, but with the following revisions described in the Technical Comments below. Based on our review of the case file we have made the following determination.

Previous investigation conducted off site indicate that petroleum hydrocarbons as gasoline, diesel, and fuel additives MtBE and Benzene were detected in groundwater at elevated concentrations up to 12,000 µg/L, 28,000 µg/L, 330 µg/L and 430 µg/L, respectively. During review of the boring logs for off site borings SB-10 through SB-15 it appears that a discrete lithologic unit may be acting as a preferential pathway for offsite contamination migration. Additionally, no offsite monitoring wells have been installed, which would aid in the delineation and monitoring of plume migration. Consequently, ACEH requests that you prepare a revised Work Plan that will address monitoring groundwater conditions off site, helping to define the extent of groundwater contamination immediately down gradient of the site.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

- 1. Soil Sampling and Analysis.** ACEH requests that one soil sample be collected at the capillary fringe, approximately 2 feet above first groundwater, at distinct changes in lithology and at approximately 5 foot intervals until total depth of the boring is reached. In addition, ACEH requests that soil samples be submitted for laboratory analyses at all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to

characterize the contamination within this interval. It is also important to determine the depth at which soil is not impacted by petroleum hydrocarbon contamination, and thus demonstrate the vertical profile of soil contamination.

After further review of the location for the proposed soil borings, ACEH request the installation of one additional soil boring approximately midway between MW-1 and SB-22 adjacent to the sidewalk. This additional soil boring location should help define plume geometry onsite. Results from the Soil and Groundwater Investigation (SWI) are to be presented in the report requested below.

- 2. Monitoring Well Installation.** Currently, three monitoring wells at the site have screen intervals that are a minimum of 12 feet in length. Please explain your rationale for defining the vertical extent of groundwater contamination and to assess, based on site-specific conditions, whether the long screen wells provide accurate groundwater monitoring results, which may not be consistent with the collection of depth discrete groundwater samples due to various conditions that can occur within the well bore. ACEH suggests the use of monitoring wells designed with sand pack intervals of 5 feet or less, as these wells will likely be representative of depth discrete groundwater conditions.

Given groundwater gradient is toward the southwest we propose offsite monitoring wells are to define the extent to dissolved contamination down gradient of the site. ACEH request that you propose the installation of additional groundwater monitoring wells off site on 13<sup>th</sup> Street in the vicinity of SB-11 and SB-14. However, taking into consideration the need for monitoring data immediately down gradient of the site, ACEH considers these monitoring wells an important component overall site characterization. Please present your rationale for the proposed monitoring well locations and long screen wells in the Revised Work Plan requested below.

- 3. Depth Discrete Groundwater Sampling.** ACEH requests that grab groundwater samples be collected at first groundwater encountered from each direct push soil boring and at locations determined during the soil boring installation. Considering the possibility that a discrete lithologic unit exists at approximately 15 to 20 feet bgs, ACEH requests that depth discrete groundwater samples be collected from this material to determine whether it maybe contributing to the migration of contamination down gradient of the site. Please present the result from the investigation in the SWI requested below.
- 4. Soil and Groundwater Analysis.** ACEH requests that all soil and groundwater samples collected below five feet bgs. be analyzed for the following constituents; TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MiBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please include results from the investigation in the Soil and Groundwater Investigation Report requested below.
- 5. Sensitive Receptor Survey.** It appears that the sensitive receptor survey has not yet been completed as requested. Therefore, in addition to the Department of Water Resources well survey, ACEH requests that you include an Alameda County Department of Public Works well survey within a 2000 feet radius of the site. Please incorporate the results of the survey in the Site Conceptual Model requested below.
- 6. Groundwater Monitoring.** Based upon the assessment of hydraulic gradient, plume delineation, and groundwater monitoring wells requested in technical comments 2, please suggest a groundwater monitoring program in the Revised Work Plan requested below.
- 7. Interim Corrective Action Plan and Pilot Test.** The pilot test will be used to determine the efficacy of

ozone sparging as an interim remedial alternative. ACEH concurs with the proposed interim corrective action with the following comments. Given the linear distance from sparge point S-2 to monitoring well MW-2, approximately 18 feet to 20 feet. It appears that the linear distance may be beyond the radius of influence of the proposed sparge point. Furthermore, soil permeability can have a limiting influence on the radius of influence of a sparge point. Review of boring logs from the Phase II investigation indicates the presence of silty sandy clay between 13 feet and 20 feet bgs. Given these factors it may be prudent to locate the sparge points no more than 10 feet from their associated monitoring well.

#### **8. Project Approach and Investigation Reporting – Site Conceptual Model**

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

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

Both industry and the regulatory community endorse the SCM approach. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

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

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down gradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.)

and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:

1. Subsurface geologic features, depth to groundwater and man-made conduits.
  2. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
  3. Soil descriptions for all borings and wells along the line of section.
  4. Screen and filter pack intervals for each monitoring well.
  5. Sampling locations and results for soil and grab groundwater samples.
  6. Site features such as the tank pit, dispensers, buildings etc. Where appropriate, monitoring well location and soil boring locations will be projected back to the strike of the cross section line.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- d) Proposed activities to investigate and fill data gaps identified above.
- e) The SCM shall include an analysis of the hydraulic flow system at and down gradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- g) Several other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.
- h) Plots of chemical concentrations vs. time and vs. distance from the source. Plots should be shown for each monitoring well, which has had detectable levels of contaminants
- i) Summary tables of chemical concentrations in each historically sampled media (including soil, groundwater and soil vapor).
- j) Boring and well logs (including construction/screening), and a summary table indicating construction specifications for each monitoring and extraction well.

**TECHNICAL REPORT REQUEST**

John Williamson  
July 10, 2006  
Page 5

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

- **August 15, 2006** – Revised Work Plan for Remedial Investigation
- **October 30, 2006** – Soil and Groundwater Investigation Report and Site Conceptual Model

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

#### **ELECTRONIC SUBMITTAL OF REPORTS**

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

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

#### **PERJURY STATEMENT**

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

#### **PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) require that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be

John Williamson  
July 10, 2006  
Page 6

performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

#### **UNDERGROUND STORAGE TANK CLEANUP FUND**

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

#### **AGENCY OVERSIGHT**

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

If you have any questions, please contact me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist  
Local Oversight Program

cc: Mr. Peter McIntyre  
AEI Consultants  
Walnut Creek, Ca 94597

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
01-29-04

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

January 27, 2004

John Williamson  
1511 Wellington St.  
Oakland, CA 94602

Dear Mr. Williamson,

Subject: Fuel Leak Case No. RO0000159, John's Mobil, 3635 13<sup>th</sup> Ave., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Soil and Groundwater Investigation Report" dated October 30, 2003 by AEI Consultants. This investigation included the collection and analyses of soil and groundwater samples collected from six off-site soil borings (SB-10 to SB-15) advanced downgradient of the source area to further define the extent of the release. We request that you address the following technical comments and send us the technical reports requested below.

**TECHNICAL COMMENTS**

- 1) Corrective Action Plan (CAP) – Propose a CAP, which shall include an assessment of the impacts, a feasibility study, and applicable cleanup levels.
- 2) Groundwater Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of grab and monitoring well groundwater samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.
- 3) Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells on a map and list well construction details for each well. Indicate which of the wells may be potential receptors.
- 4) Preferential Pathway Study – We request a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as vertical conduits to deeper water bearing zones, pumping wells in the vicinity of your site, and manmade conduits for shallow migration. Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed

well survey and utility survey requested below). Please include an evaluation of the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers.

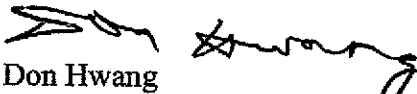
An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume area(s) is required as part of your study. Please report your results in the Soil and Water Investigation Report (SWI) requested below.

- 5) Historical Hydraulic Gradients – Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.

#### TECHNICAL REPORT REQUEST

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by March 27, 2004. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: AEI Consultants, Camino Diablo, Suite 200, Walnut Creek, CA 94597  
Donna Drogos  
file



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



11-2-01

20159

November 5, 2001

**STID 1121**

Mr. John Williamson  
John's Mobil  
1511 Wellington Street  
Oakland, CA 94602

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

**RE: Property at 3635 13<sup>th</sup> Ave., Oakland, CA 94610**

Dear Mr. Williamson:

I am in receipt of "Well installation and Sampling" document, dated October 25, 2001, submitted by Mr. Peter McIntyre of All Environmental Inc., concerning the above referenced site. This office had previously received and approved the proposed workplan regarding the above referenced site dated December 3<sup>rd</sup>, 1999. This included installations of two additional monitoring wells. In my previous correspondence I had indicated that the workplan was acceptable due to the following:

The groundwater flow gradient is southeasterly and the proposed monitoring wells are either cross-gradient (MW-4) or down-gradient and off-site (MW-5).

SB5, SB6, and SB8, all off-site borings, revealed existence of some contaminants in soil and ground water, the petroleum contaminants seems to have migrated off-site to the southeast.

Furthermore, I suggest that the proposed MW-5 well be moved about 10 feet further to the northeast, from the previously proposed location, to better situate the well for capturing any down-gradient contaminants.

Additionally all existing monitoring wells must be properly maintained.

Please notify this office in advance regarding your fieldwork schedule, so that a representative of this office could be present during the field works event if necessary.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Peter McIntyre, All Environmental, Inc. 901 Moraga Road,  
Suite C, Lafayette, CA 94549  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 12/16/99  
Including cc's

20159

December 16, 1999

**STID 1121**

Mr. John Williamson  
John's Mobil  
1511 Wellington Street  
Oakland, CA 94602

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

**RE: Property at 3635 13<sup>th</sup> Ave., Oakland, CA 94610**

Dear Mr. Williamson:

This office is in receipt of the proposed workplan regarding the above referenced site dated December 3<sup>rd</sup>, 1999 submitted by Mr. Peter McIntyre of All Environmental, Inc. Thank you for prompt submittal of the workplan.

I concur with the Mr. McIntyre's proposal made in the workplan due to the following facts:

- The groundwater flow gradient is southeasterly and the proposed monitoring wells are either cross-gradient (MW-4) or down-gradient and off-site (MW-5).
- SB5, SB6, and SB8, all off-site borings, revealed existence of some contaminants in soil and ground water, the petroleum contaminants seems to have migrated off-site to the southeast.

However, I would suggest to move the proposed MW-5 well about 10 feet further to the northeast, from the present proposed location, to better situate the well for capturing any down-gradient contaminants.

Please maintain monitoring of the existing monitoring wells on the site.

As discussed previously, please give me advance notice regarding your fieldwork schedule, so that I could be present during the field works event if necessary.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Peter McIntyre, All Environmental, Inc. 901 Moraga Road,  
Suite C, Lafayette, CA 94549  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 12/15/99  
Including cc's

20159

December 15, 1999

STID 1121

Mr. John Williamson  
John's Mobil  
1511 Wellington Street  
Oakland, CA 94602

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

**RE: Property at 3635 13<sup>th</sup> Ave., Oakland, CA 94610**

Dear Mr. Williamson:

I am in receipt of the Phase II Subsurface investigation dated January 20, 1999 submitted by Mr. Nick Walchuk of All Environmental, Inc. Thank you for the submittal of the report.

Per my discussion with Mr. Peter McIntyre of AEI, your consultant, I have just been assigned to oversee the clean up activity at the above referenced site.

The groundwater flow gradient is southeasterly and since SB5, SB6, and SB8 revealed existence of some contaminants in soil and ground water, the petroleum contaminants have migrated off-site to the southeast. Therefore I concur with the AEI recommendation for further investigation to delineate the extent of the plume by taking additional soil/groundwater sampling and or monitoring well installation as well as continued monitoring of the existing monitoring wells on the site.

**Please submit a workplan as discussed to proceed further with this case.**

Please call this office and give me advance notice regarding your sampling schedule, so that I could be present during the sampling event.

If you have any questions, call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Peter McIntyre, All Environmental, Inc. 901 Moraga Road,  
Suite C, Lafayette, CA 94549  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 10-22-99  
including cc's

20159

October 20, 1999

ENVIRONMENTAL HEALTH SERVICES

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

STID 1121

Mr. John Williamson  
John's Mobil  
1511 Wellington Street  
Oakland, CA 94602

RE: Property at 3635 13<sup>th</sup> Ave., Oakland, CA 94610

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Williamson:

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.

LANDOWNER NOTIFICATION

Re: 3635 13<sup>th</sup> Ave., Oakland

October 20, 1999

Page 2 of 2

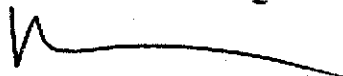
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

Please call me at (510) 567-6876 if you have any questions about the content of this letter.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

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

"List of Landowners" form  
(Sample Letter 2)

**SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR ( Site  
name and address)  
( to be filled in by the primary responsible party and mailed to  
Alameda County)**

(Note: Fill out item 1 if there are multiple site landowners. If  
you are the sole site landowner, skip item 1 and fill out item 2)

1. In accordance with section 25297.15(a) of Chapter 6.7 of  
the Health & Safety Code, I, (name of primary responsible  
party), certify that the following is a complete list of  
current record fee title owners and their mailing addresses  
for the above site:
  
2. In accordance with section 25297.15(a) of Chapter 6.7 of  
the Health & Safety Code, I, (name of primary responsible  
party), certify that I am the sole landowner for the above  
site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

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

**"Notice of Proposed Action" form  
(Sample Letter 3)**

**SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR  
(site name and address)  
(to be filled in by the primary responsible party and mailed to  
Alameda county)**

In accordance with section 25297,15(a) of Chapter 6.7 of the  
Health & Safety Code, I, (name of primary responsible party),  
certify that I have notified all responsible landowners of the  
enclosed proposed action. Check space for applicable proposed  
action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no  
further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO#159

July 11, 1997  
STID # 1121  
REVISED

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

John Williamson  
John's Mobil  
1511 Wellington St  
Oakland CA 94602

**Re: Phase II Subsurface Investigation Workplan for John's Mobil,  
3635 - 13th Ave, Oakland CA 94610**

This office has recently received and reviewed the Phase II Subsurface Investigation workplan dated, June 5, 1997, for the above referenced site. The plan was submitted by All Environmental on your behalf. The proposed work is intended to:

- 1) Further delineate the lateral extent of groundwater contamination in the vicinity of MW-2;
- 2) Determine if affected groundwater is migrating off site and;
- 3) Characterize the extent of increase soil contamination surrounding the former fuel tank excavation.

According to the workplan, six (6) soil borings will be drilled position to the north (SB-4, SB-1), northeast (SB-3, SB-5) and south of the former fuel tanks (SB-6). Boring SB-2 will be placed west of the former tank location. In addition, soil samples will be collected at 3 ft-bgs and then at 5 ft intervals beginning at 5 ft-bgs. The soil samples will be screened for organic vapors. One soil and groundwater sample from each boring will be analyzed for TPHg, BTEX, MTBE and total lead (total pb).

The workplan is approved with the stipulation that our office may require further work to complete the investigation. Based on the location of MW-2 relative to the former tank area, groundwater contamination appears to migrate toward the south and southwest. Additional boring(s) to the south and southwest from MW-2 would further characterize the contamination identified and complete the data gap.

**Be advised that quarterly groundwater sampling from MW-2 must be continued at this time.** If laboratory groundwater analysis of the 1st and 2nd quarter of 1997 documents low risk concentrations of TPHg and BTEX, this office may request case closure with the



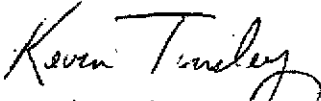
Mr. J. Williamson  
Re: john's Mobil  
3635 - 13th Street  
July 11, 1997

Page 2 of 2

Regional Water Quality Control Board (RWQCB) as a low risk groundwater case. Please submit the reports from the above mentioned sampling events within 30 days, or no later than August 15, 1997. If the concentrations are not stable or exceed the low risk standards, a minimum of three or four quarters of groundwater sampling will be required to document conditions over a one year period.

This letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267 (b). If you have any questions or concerns do not hesitate to call me at 567-6731, Monday through Friday.

Sincerely,

  
Kevin Tinsley

cc: Bryan Campbell, Project Geologist, All Environmental  
3364 Mt Diablo Blvd, Lafayette, CA 94549

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



STID 1121

RO#159

November 15, 1996

John Williamson  
1511 Wellington Street  
Oakland, CA 94602

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

RE: JOHN'S MOBIL, 3635 13TH AVENUE, OAKLAND

Dear Mr. Williamson,

This office is in receipt of and has completed review of the case file for this site, up to and including the October 28, 1996, All Environmental Inc., (AEI) "Semi-annual Groundwater Monitoring and Sampling Report".

Groundwater samples collected from MW-2 have consistently shown the highest levels of detectable hydrocarbons during the four sampling events, with the most recent groundwater sampling detecting 15,000 ppb-TPHg, 1,900 ppb-TPHd, 4300 ppb-benzene, 920 ppb-toluene, 460 ppb-ethyl benzene and 1,600 ppb-total xylenes. **Benzene concentrations have increased from 17 ppb to 4,300 ppb in well MW-2, yet no explanation is given in the AEI report.** The AEI report simply states that "Analysis of groundwater samples from well MW-2 continues to indicate high levels of contamination" and "recommends the continued semi-annual monitoring and sampling of the wells".

This soil and groundwater data was analyzed using a limited ASTM Risk-Based Corrective Action (RBCA) Tier 1 Risk Based Screening Level (RBSL) evaluation as referenced in the ASTM E 1739 - 95 document "Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites". The ASTM E 1739 - 95 document is a consistent decision-making process for the assessment and response to a petroleum release, and is based on the protection of human health and the environment. The Tier I risk assessment compares the chemicals of concern (COCs) documented at the site with Tier 1 RBSLs as presented in the published Look-up Table (ASTM E 1739-95 - Table X2.1 "Example Tier 1 Risk-Based Screening Level (RBSL) Look-up Table). *Note: Hazard Quotients (HQ) are used in the development of RBSLs for non-carcinogenic compounds only (examples: toluene, ethyl benzene, total xylenes, etc.), and are not used in determining RBSLs for carcinogens such as benzene.*

This evaluation determined that for the following risk exposure scenario, contaminant levels exceed the CA-modified Tier 1 RBSLs:

- ◆ "Groundwater-Vapor Intrusion from Groundwater to Buildings" at a target level of  $1E-04$  (2.14 mg/L, 1 in 10,000 excess cancer risk) for a commercial/industrial receptor scenario.

Mr. Williamson  
RE: 3635 13th Avenue, Oakland  
November 15, 1996  
Page 2 of 2

Ground water monitoring data generated since November 1994 have shown ground water gradient and flow direction to be in a southeasterly direction at a fairly steep gradient (approximately 0.1ft/ft). Ground water samples collected from monitoring well MW-2 have consistently revealed elevated levels of TPHg and BTEX. The extent of the groundwater contamination has not yet been defined.

Pursuant to provisions of Article 11, Title 23, California Code of Regulations you are required to perform a soil and water investigation (SWI) to define the extent of both soil and groundwater contamination. In order to pursue the SWI in a more cost-effective fashion, this office has suggested that you first employ rapid site assessment tools (e.g. CPT, Geo Probe, Hydropunch, etc.) to qualitatively assess impacts and to define the extent of the contaminant plume before proposing final well locations.

At a minimum, one additional groundwater monitoring well should be installed down gradient of well MW-2 and the two former gasoline underground storage tanks (USTs).

**This work plan is due within 60 days of the date of this letter, or by January 15, 1997.**

Work should commence no later than 30 days following approval in writing from this office.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB for enforcement action.

For your information, I have taken over management of this site from Jennifer Eberle of this office. Please feel free to call me directly at 510/567-6880, should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Dale Klettke--files  
Joe Derhake, AEI, 3364 Mt. Diablo Blvd., Lafayette, CA 94549  
1121swi2.dkt

PK

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO#159  
ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

STID 1121

January 10, 1996

John Williamson  
1511 Wellington Street  
Oakland, CA 94602

ALAMEDA COUNTY  
ENVIRONMENTAL HEALTH SERVICES  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

RE: JOHN'S MOBIL, 3635 13TH AVENUE, OAKLAND

Dear Mr. Williamson,

In an Alameda County Health Care Services Agency (ACHCSA) letter dated October 12, 1995, I requested additional information in the form of a Soil and Water Investigation (SWI) for the above referenced site.

In response to the changing regulations resulting from Senate Bill 1764 (and the SB1764 Scientific Advisory Committee), the California Regional Water Quality Control Board (RWQCB) issued its December 8, 1995 "Interim Guidance on Required Cleanup at Low Risk Fuel Sites". This document was further modified by the January 5, 1996-RWQCB "Supplemental Instructions" guidance recommended for use in regulating low-risk sites.

These guidance documents concur with the findings and conclusions of the Lawrence Livermore National Laboratory Study (October 16, 1995), which recommended that fuel sites be treated differently and less stringently than solvent sites. The study also concluded that most fuel sites fall into the low-risk category, for which source removal and passive remediation are adequate.

In order for your site to fall into the "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.

Mr. Williamson  
RE: 3635 13th Avenue, Oakland  
Page 2 of 2

For more detailed information and a copy of the Interim Guidance Document, please contact the Regional Board. Also, please note that this guidance, like that provided in the State Board's December 8 letter, is only interim. The recommendations of the S1764 Scientific Advisory Committee are due this month, and any pending changes will presumably be reflected in the State Board's spring update to its cleanup policy later this spring.

After cursory review of your site files, at this time it appears that your site qualifies as a low-risk groundwater site. Therefore passive remediation including continued groundwater monitoring will be required.

At this time please 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), beginning 1st quarter 1996. Sample analytes shall continue to be total petroleum hydrocarbons as gasoline (TPHg), MTBE and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX).

Sampling of monitoring wells MW1, MW2 and MW3 should continue until four consecutive sampling events have documented acceptable levels of chemicals in groundwater samples collected from the three monitoring wells. After the documentation of the next (first quarter-1996) quarter of groundwater sampling, ACHCSA will re-evaluate the site to determine whether a reduced (semi-annual) schedule of groundwater monitoring is warranted for this site.

**The submittal of a Soil and Water Investigation work plan is no longer being requested by this office as documented by my ACHCSA letter dated October 12, 1995.**

This case has been transferred to my oversight by Jennifer Eberle of this office. Please feel free to call me directly at 510/567-6880, should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Gordon Coleman, Acting Chief, Environmental Protection Division--files  
Jennifer Eberle-file  
Gil Jensen, Alameda County District Attorney's Office  
Jennifer Anderson, ALL Environmental, 2641 Crow Canyon Rd, Suite 5, San Ramon  
94583

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0159

RAFAT A. SHAHID, Assistant Agency Director

STID 1121

October 12, 1995

John Williamson  
1511 Wellington Street  
Oakland, CA 94602

Alameda County  
Environmental Protection Division  
1131 Harbor Bay Pkwy., #250  
Alameda CA 9450-26577  
(510) 567-6700

CC4580

RE: JOHN'S MOBIL, 3635 13TH AVENUE, OAKLAND

Dear Mr. Williamson,

As per our conversation on October 11, 1995, you raised concerns regarding the August 21, 1995 ACHCSA letter from Jennifer Eberle of this office. You requested that you receive documentation defining the analytical parameters for the soil samples taken at two different locations from beneath the dispenser island.

**The analytical parameters for the soil samples collected from beneath the dispenser island are to be total petroleum hydrocarbons as gasoline (TPHg) and the BTEX fractions, benzene, toluene, ethyl benzene and total xylene isomers.**

As you already know from our recent conversation, groundwater has been sampled for four quarters in monitoring wells MW-1, MW-2 and MW-3. Significant concentrations are being detected in all three monitoring wells, with monitoring well MW-2 being located in the "inferred" down gradient direction from the former gasoline USTs, and MW-1 being located in the "inferred" down gradient direction from the former waste oil tank. Groundwater samples collected from MW-2 have consistently shown the highest levels of detectable hydrocarbons during the four sampling events, with the most recent groundwater sampling detecting 7200 ppb TPHg, 43 ppb-benzene, 21 ppb-toluene, 21 ppb-ethyl benzene and 71 ppb-total xylenes.

The groundwater sample collected from MW-1, which is located in the "inferred" down gradient direction from the former waste oil tank, was found to contain 2800 ppb-TPHg, 25 ppb-benzene, 6.2 ppb-toluene, 22 ppb-ethyl benzene and 30 ppb-total xylenes. These petroleum hydrocarbons are usually associated with gasoline releases, and are usually not associated with waste oil releases. In addition, the groundwater sample from MW-1 was found to contain non-detectable concentrations of total petroleum hydrocarbons as diesel (TPHd) and total oil and grease (TOG), substances normally found in waste oil releases.

Monitoring well MW-3 was installed in an up-gradient location from the former gasoline USTs. However, monitoring well MW-3 has consistently shown elevated levels of TPHg and BTEX fractions, with the most recent groundwater sampling event detecting 310 ppb-TPHg, 3.1 ppb-benzene, 2.1 ppb-toluene, 2.2 ppb-ethyl benzene and 11 ppb-total xylenes.

Mr. Williamson  
RE: 3635 13th Avenue, Oakland  
Page 2 of 2

Ground water monitoring data generated since November 1994 have shown ground water gradient and flow direction to be in a southeasterly direction at a fairly steep gradient (approximately 0.1ft/ft). Ground water samples collected from monitoring wells MW-1, MW-2 and MW-3 have consistently shown elevated concentrations of fuel hydrocarbons. The extent of the contamination has not yet been defined.

Pursuant to provisions of Article 11, Title 23, California Code of Regulations you are required to perform a soil and water investigation (SWI) to define the extent of both soil and groundwater contamination. In order to pursue the SWI in a more cost-effective fashion, this office has suggested that you first employ rapid site assessment tools (e.g. CPT, Geo Probe, Hydropunch, etc.) to qualitatively assess impacts and to define the extent of the contaminant plume before proposing final well locations.

**This work plan is due within 90 days of the date of this letter, or by January 12, 1995.**  
Work should commence no later than 30 days following approval in writing from this office.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB for enforcement action.

The soil sampling to be performed around the former dispenser islands should be completed as soon as possible, since results of this soil sampling may need to be incorporated into the forthcoming SWI.

I am temporary covering for Jennifer Eberle in her absence. Please feel free to call me directly at 510/567-6880, should you have any questions.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Gordon Coleman, Acting Chief, Environmental Protection Division--files  
Jennifer Eberle-file  
Gil Jensen, Alameda County District Attorney's Office

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0159

RAFAT A. SHAHID, Director

August 21, 1995  
STID 1121

John Williamson  
1511 Wellington St.  
Oakland CA 94602

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Environmental Protection Division  
1131 Harbor Bay Parkway, #250  
Alameda, CA 94502-6577  
(510) 567-6700

RE: John's Mobil, 3635-13th Ave., Oakland CA 94610

Dear Mr. Williamson,

Since my last letter to you, dated 10/28/94, the following documents have been received in this office:

- 1) 12/14/94 "Final Report, Soil Boring and Monitorig Well Installation," prepared by AEI
- 2) 3/9/95 "2nd Quarterly Groundwater Monitoring Report," prepared by AEI
- 3) 6/19/95 "Third Quarterly Groundwater Monitoring Report," prepared by AEI

As you probably know, groundwater has been sampled for 3 consecutive quarters, with a consistent Southeast groundwater flow direction. MW2 has shown consistent and significant concentrations of TPH-gasoline and BTEX.

Upon a thorough review of the file for this case, it appears that soils below the pump island were never sampled. Reference can be made to the 1/20/93 "Final Report, Underground Storage Tanks Removal" report, prepared by Aqua Science Engineers. Since the pump island was located immediately North of the former gasoline USTs, and North-Northwest (upgradient) of MW2, it is possible that soil contaminants in this area are the source of the groundwater contamination in MW2. Therefore, you are requested to collect samples from two locations below the former dispenser island. This can be done most easily and inexpensively with a hand auger. Soil samples should be collected from at least two depths in each sample location, starting at 5'bgs. Our files include a site map which was not drawn to scale. You are requested to procure a site map, which indicates the location of the former pump island. Please check your files for such a site map. A workplan will not be necessary for this work. However, I would like to work with your consultant and a better site map. Please respond to this matter within 30 days, or by September 21, 1995.



August 21, 1995  
STID 1121  
John Williamson  
page 2 of 2

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. **You are encouraged to submit reports on double-sided paper in order to save trees.**

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Mike Killoran, All Environmental Inc., 2641 Crow Canyon Rd., #5, San Ramon CA  
94583  
Leroy Todd/file

je.1121

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0159

ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

October 28, 1994  
STID 1121

John Williamson  
1511 Wellington St.  
Oakland CA 94602

RE: John's Mobil<sup>15</sup>  
3635-13th Ave.  
Oakland CA 94610

Dear Mr. Williamson,

The last letter I wrote you was dated 3/9/94, and it found acceptable the 12/9/93 "Soil Boring and Monitoring Well Installation Workplan," prepared by All Environmental Inc. (AEI).

On 8/9/94, this office received a complaint regarding the school children gaining access to the drums onsite. On that date, I spoke with Guy Roy of AEI, who indicated that the wells had been installed, but not developed or sampled. I confirmed this status with Guy Roy on 9/30/94.

It appears this project is being delayed. I tried to contact you by phone on 10/3/94 to discuss the situation. Please have the wells developed and sampled, as per the 12/9/93 AEI workplan, and my 3/9/94 letter, within 30 days, or by November 28, 1994. Please submit a report of well installation activities and sampling results within 60 days, or by December 28, 1994.

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports.

If you have any questions, please contact me at 510-567-6700, ext 6761. This is our new permanent phone number; our new fax number is 510-337-9335. Feel free to submit reports on double-sided paper in order to save precious trees.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Guy Roy, All Environmental, 2641 Crow Canyon Rd., Suite 5,  
San Ramon CA 94583  
Ed Howell/file

je 1121-A

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

R0159

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 9, 1994  
STID 1121

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

John Williamson  
1511 Wellington St.  
Oakland CA 94602

RE: John's Mobil  
3635-13th Ave.  
Oakland CA 94610

Dear Mr. Williamson,

We are in receipt of the "Soil Boring and Monitoring Well Installation Work Plan," prepared by All Environmental Inc., dated 12/9/93. As you know, this workplan consists of three monitoring wells to assess groundwater conditions. We are also in receipt of a revised site map faxed on 3/8/94. This workplan, along with the revised site map, is acceptable on the following conditions, as was discussed between myself and Guy Roy on 2/4/94:

- 1) the well screen will extend 5 feet above the encountered groundwater elevation
- 2) the well will be developed not less than 72 hours after installation, as per Section 2649 of 23 CCR
- 3) total lead may be deleted from the sampling matrix

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: All Environmental Inc., 2641 Crow Canyon Rd., Suite 5, San  
Ramon CA 94583  
Ed Howell/file

je

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0159

June 22, 1993  
STID 1121

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

John Williamson  
1511 Wellington St.  
Oakland CA 94602

RE: John's Mobil  
3635-13th Ave.  
Oakland CA 94610

Dear Mr. Williamson,

We are in receipt of the "Proposal - Additional On-Site Activities," prepared by Aqua Science Engineers (ASE), dated 4/19/93. This is actually the bid presented to you from ASE for additional on-site work. A consultant's bid is a summary of work which they will later specify in an actual proposal (aka workplan). This bid is not what we requested in our letter to you dated 3/11/93.

Therefore, we again request submittal of a workplan/proposal for a subsurface investigation, **within 30 days or by July 22, 1993.** This workplan/proposal should include a) a groundwater investigation, which should involve three groundwater monitoring wells in a triangulated fashion, and b) sampling for the hydraulic lifts.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, - Certified Engineering Geologist, or -Registered Civil Engineer.

However, if you wish to do the work in phases, beginning with overexcavation of the waste oil pit, a workplan will not be necessary for the first phase of work. Please contact me at least 3 business days in advance of field activities so that I may arrange to be onsite. I hope this clarifies any confusion regarding the workplan/proposal. Lastly, please fill out and submit an **Unauthorized Release Form** (attached) as soon as possible. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Dave Allen, Aqua Science Engineers, 2411 Old Crow Canyon Rd.  
#4, San Ramon CA 94583  
Ed Howell/file

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0159

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 22, 1993  
STID 1121

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

John Williamson  
1511 Wellington St.  
Oakland CA 94602

RE: John's Mobil  
3635-13th Ave.  
Oakland CA 94610

Dear Mr. Williamson,

We are in receipt of the "Proposal - Additional On-Site Activities," prepared by Aqua Science Engineers (ASE), dated 4/19/93. This is actually the bid presented to you from ASE for additional on-site work. A consultant's bid is a summary of work which they will later specify in an actual proposal (aka workplan). This bid is not what we requested in our letter to you dated 3/11/93.

Therefore, we again request submittal of a workplan/proposal for a subsurface investigation, **within 30 days or by July 22, 1993.** This workplan/proposal should include a) a groundwater investigation, which should involve three groundwater monitoring wells in a triangulated fashion, and b) sampling for the hydraulic lifts.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

However, if you wish to do the work in phases, beginning with overexcavation of the waste oil pit, a workplan will not be necessary for the first phase of work. Please contact me at least 3 business days in advance of field activities so that I may arrange to be onsite. I hope this clarifies any confusion regarding the workplan/proposal. Lastly, please fill out and submit an **Unauthorized Release Form** (attached) as soon as possible. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Dave Allen, Aqua Science Engineers, PO Box 535, San Ramon  
CA 94583

Ed Howell/file

je

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0159

March 11, 1993  
STID 1121

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

John Williamson  
1511 Wellington St.  
Oakland CA 94602

RE: John's Mobil  
3635-13th Ave.  
Oakland CA 94610

Dear Mr. Williamson,

We are in receipt of the "Final Report, Underground Storage Tanks Removal," prepared by Aqua Science Engineers (ASE), dated 1/20/93. As you know, this report documents the removal of a 250-gallon waste oil tank, a 500-gallon gasoline tank, and a 1,000-gallon gasoline tank at the above referenced site on 12/15/92. The waste oil tank was reported as "being heavily pitted and had numerous holes" (page 2).

The waste oil tank is the primary concern at this site. Soils beneath the waste oil tank were contaminated by 8,200 ppm Oil & Grease, 290 ppm TPH-gas, .140 ppm benzene, 255 ppm lead, .150 ppm 1,1-DCE, and .028 ppm 1,1,2-TCA. Due to these significant levels of contamination, we recommend further excavation of affected soils in the waste oil tank pit. We also request a groundwater investigation to determine if groundwater has been impacted. Please submit a proposal for a subsurface investigation, including a groundwater investigation, within 45 days or by April 16, 1993.

In addition, I understand that there are hydraulic lifts located in the building with the former waste oil tank, as per a telephone conversation today between myself and Steve DeHope of ASE. I also understand that there are plans to remove the hydraulic lifts. Soil sampling will be required for the removal of these lifts. Please notify me at least two business days in advance of field work associated with the hydraulic lifts.

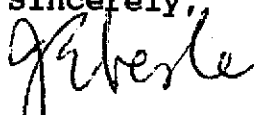
All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to:

John Williamson  
STID 1121  
March 11, 1993  
page 2 of 2

Rich Hiatt  
San Francisco Bay Region  
Regional Water Quality Control Board  
2101 Webster St., Ste 500  
Oakland CA 94612

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Steve DeHope, Aqua Science Engineers, PO Box 535, San Ramon  
CA 94583  
Rich Hiatt, RWQCB  
Ed Howell/file

je