DAVID J. KEARS, Agency Director

11-5-01

120163

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

STID 3942

October 25, 2001

Mr. Steve Lofholm The IT Group 1433 North Market Blvd. Sacramento, CA 95834

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Lofholm:

This office is in receipt of First Quarter Monitoring Report dated October 15, 2001, by Mr. Ron Scheele of Cambria Environmental Technology Inc. regarding the above referenced site. Thank you for submittal of the report. Please consider the following comments:

- 1. The monitoring wells MW-5 and VW-4 wells still contain the highest concentrations of constituents including TPHG, Benzene, and MTBE. MW-5 well revealed 13,000ppb TPHG, 19ppb benzene, and 230ppb of MTBE. VW-4 well, indicated 2,100ppb TPHG, 9.2ppb benzene, and 3,700ppb of MTBE. Similar to previous trend, both wells reveal some increase in concentrations of some constituent while a decrease in the concentrations of others.
- 2. Most of the other wells did not contain significant amount of concentration. You may skip the sampling and analysis of the wells, which have historically revealed very low or non-detect levels of constituents in the past.
- 3. The groundwater flow gradient is almost Westerly at 0.075 ft/ft Per figure 1 and table 2 of the above document.
- 4. This office concurs with the work proposed for the next quarter as indicated by Mr. Ron Scheele of Cambria Environmental Technology Inc. within the above report.

Please call me at (510) 567-6876, if you have any questions,

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Paul Supple, ARCO, P.O. Box 6549 Moraga, CA 94570 Files

05-230)

PO163

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

STID 3942

May 22, 2001

Mr. Steve Lofholm
The IT Group
1433 North Market Blvd.
Sacramento, CA 95834

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Lofholm:

I am in receipt of First Quarter Monitoring Report dated April 25, 2001, by Mr. Ron Scheele of Cambria Environmental Technology Inc. regarding the above referenced site. It seems that The It Group Corporation is no longer providing consulting services regarding the above referenced site, and that Cambria Environmental has taken over the clean up project. I have reviewed the above document and would like to make the following comments:

- The MW-5 and VW-4 wells represent the wells with the highest concentrations of pollutants including TPHG, Benzene, and MTBE. MW-5 well revealed 8,840ppb TPHG, 33.9ppb benzene, and 352ppb of MTBE. VW-4 well, indicated 1,400ppb TPHG, 9.42ppb benzene, and 3,570ppb of MTBE. Both wells indicate a decrease in the concentrations of MTBE. However, there was a slight increase in concentration of Benzene in MW-5.
- Per figure 1 and table 2 of the above document, the groundwater flow gradient is West-Southwesterly at 0.074 ft/ft.
- Please ensure that all Quarterly Monitoring Reports are submitted in a timely manner.
- I concur with the work proposed for the next quarter as suggested by Mr. Ron Scheele of Cambria Environmental Technology Inc. within this report dated April 25th, 2001.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Paul Supple, ARCO, P.O. Box 6549 Moraga, CA 94570 Files





, Q-23-4

PO163

STID 3942

February 14, 2001

Mr. Chuck Carmel ARCO 4 Center Point Drive La Palma, CA 90623-1066 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. 'Carmel:

I am in receipt of "Fourth Quarter 2000 Monitoring Report" dated January 15, 2001, by Mr. Ron Scheele of Cambria Environmental Technology Inc.

I have reviewed the above document and would like to make the following comments regarding this document:

As in the past, the MW-5 and VW-4 are the wells with the highest concentrations of the constituents. The MW-5 well indicated 7,030ppb TPHG, 19.7ppb benzene, and 445ppb of MTBE. VW-4 well, on the other hand, revealed up to 1,390ppb TPHG, 18.5ppb benzene, and 8,840ppb of MTBE. Both MW-5 and VW-4 well indicates an increase in the concentrations of Benzene and MTBE.

The flow gradient is to the west-southwest at 0.08 ft/ft according to figure 1 within this report.

I concur with Mr. Mr. Ron Scheele of Cambria Environmental regarding the work proposed for the next quarter as indicated in the above report dated January 15, 2001.

Should 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. Ron Scheele, Cambria Environmental Technology Inc. Cambria Environmental Technology Inc.1144 65th Street, Suite B, Oakland, CA 94608 Files





00163

Stid 3942

November 30, 2000

Mr. Chuck Carmel ARCO 4 Center Point Drive La Palma, CA 90623-1066 ENVIRONMENTAL HEALTH SERVICES

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

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Carmel:

This office is in receipt of "Third Quarter 2000 Monitoring Report" dated October 10, 2000, by Mr. Darryk Ataide of Cambria Environmental Technology Inc.

I would like to make the following comments regarding the Quarterly Groundwater Monitoring Report dated July 28, 2000 by Mr. Ron Scheele of Cambria Environmental Technology Inc.

Per this report the MW-5 and VW-4 are still the wells with the highest concentrations of the constituents. The MW-5 well indicated 10,500ppb TPHG, 15ppb benzene, and 430ppb of MTBE. The VW-4 well, indicated up to 2,230ppb TPHG, < 10ppb benzene, and 5,310ppb of MTBE. MW-5 well indicates a decrease in the concentrations of MTBE while VW-4 had a slight increase in MTBE concentration.

Figure 1 reveals the flow gradient to be westerly at 0.087 ft/ft.

I concur with Mr. Ataide of Cambria Environmental regarding the work proposed for the next quarter as indicated in the above report dated October 10, 2000.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Darryk Ataide of Cambria Environmental Technology Inc. Cambria Environmental Technology Inc.1144 65th Street, Suite B, Oakland, CA 94608 files

AGENCY DAVID J. KEARS, Agency Director



RO#163

Stid 3942

October 3, 2000

Mr. Chuck Carmel ARCO 4 Center Point Drive La Palma, CA 90623-1066 ENVIRONMENTAL HEALTH SERVICES

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

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Carmel:

I am in receipt of "Second Quarter 2000 Monitoring Report" dated July 28, 2000 by Mr. Ron Scheele of Cambria Environmental Technology Inc. I believe you have recently replaced your consultant and that you will be working with Cambria Environmental. The last report was performed by It Group Corporation.

I would like to make the following comments regarding the Quarterly Groundwater Monitoring Report dated July 28, 2000 by Mr. Ron Scheele of Cambria Environmental Technology Inc.:

- There is high concentrations of TPHG and MTBE present in MW-5 and VW-4 wells. The MW-5 well indicated 9,680ppb TPHG, 38ppb benzene, and 930ppb of MTBE. The MW-4 well, indicated up to 1,360ppb TPHG, <2ppb benzene, and 4,900ppb of MTBE. However, both wells indicate a decrease in the concentrations of MTBE.
- 2. The flow gradient was determined to be westerly at 0.042 ft/ft.
- 3. I concur with the work proposed for the next quarter as indicated in the above report dated dated July 28, 2000 by Ron Scheele of Cambria Environmental Technology Inc.

Should 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. Darryk Ataide, Cambria Environmental Technology Inc. 1144 65th Street, Suite B, Oakland, CA 94608 Files

DAVID J. KEARS, Agency Director



snt 3-30-2020

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

Stid 3942

March 30, 2000

Mr. Steve Lofholm The IT Group 1433 North Market Blvd. Sacramento, CA 95834

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Lofholm:

I have just been informed that Mr. Glen VanderVeen of former Pinnacle Environmental is no longer the consultant regarding the above referenced site, and that Pinnacle and Emcon corporations no longer exist, and have been taken over by The It Group Corporation. I understand that you have been assigned to continue work at the above referenced site. I would like to inform you of my last correspondence with Mr. Paul Supple of Arco.

I made several comments regarding the Quarterly Groundwater Monitoring Report dated February 18th, 2000 by Mr. Glen VanderVeen of Pinnacle Environmental Solution including the following:

- High concentrations of TPHG and MTBE still exist in MW-5 and VW-4 wells. While MW-5 well
 indicated 11,000ppb TPHG, 19ppb benzene, and 590ppb of MTBE, VW-4 well, indicated up to
 1,400ppb TPHG, <0.5ppb benzene, and 4,200ppb of MTBE. However, both wells indicate a decrease
 in the concentrations of MTBE.
- 2. The flow gradient has been always either westerly or west southwesterly. However, the average flow gradient has been to the west on 10-29-99.
- 3. I concur with the work proposed for the next quarter as indicated in the above report dated February 18th, 2000 by Mr. VanderVeen of Pinnacle Environmental Solution.

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: Files



SNT 3-14-2000-

PO163

ENVIRONMENTAL HEALTH SI ENVIRONMENTAL PROTECTION (LC 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

DAVID J. KEARS, Agency Director

Stid 3942

March 13, 2000

Mr. Chuck Carmel ARCO Products Co. 2620 Lunada Lane Alamo, CA 94507

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Carmel:

I just received a phone call from Mr. Paul Supple of Arco Products Co., who informed me that you would be handling this case from now on. I have received and reviewed the Quarterly Groundwater Monitoring Report dated February 18th, 2000 by Mr. Glen VanderVeen of Pinnacle Environmental Solution.

Per this report high concentrations of TPHG and MTBE still exist in MW-5 and VW-4 wells While MW-5 well indicated 11,000ppb TPHG, 19ppb benzene, and 590ppb of MTBE, VW 4 well, indicated up to 1,400ppb TPHG, < 0.5ppb benzene, and 4,200ppb of MTBE. However, both wells indicate a decrease in the concentrations of MTBE.

The average flow gradient has been to the west on 10-29-99. However, the flow gradier has been always either westerly or west-southwesterly.

I concur with the work proposed for the next quarter as indicated in the above report date February 18th, 2000 by Mr. VanderVeen of Pinnacle Environmental Solution.

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

Sincerely,

Amir K. Gholami, REHS **Hazardous Materials Specialist**

C: Mr. Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek, CA 94596 **Files**

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

PO163

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Stid 3942

March 8, 2000

Mr. Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Supple:

I am in receipt of the Quarterly Groundwater Monitoring Report dated February 18th, 2000 by Mr. Glen VanderVeen of Pinnacle Environmental Solution.

According to this report high concentrations of TPHG and MTBE still exist in MW-5 and VW-4 wells. While MW-5 well indicated 11,000ppb TPHG, 19ppb benzene, and 590ppb of MTBE, VW-4 well, indicated up to 1,400ppb TPHG, <0.5ppb benzene, and 4,200ppb of MTBE. However, both wells indicate a decrease in the concentrations of MTBE.

The average flow gradient has been to the west on 10-29-99. However, the flow gradient has been always either westerly or west-southwesterly.

I agree with the work proposed for the next quarter as indicated in the above report dated February 18th, 2000 by Mr. VanderVeen of Pinnacle Environmental Solution.

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

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Mr. Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek, CA 94596

Files

AGENCY

DAVID J. KEARS, Agency Director



Just 12/9/99 Including cc's

po163

ENVIRONMENTAL HEALTH SERVICES

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

Stid 3942

December 9, 1999

Mr. Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Supple:

This office is in receipt of the Quarterly Groundwater Monitoring Report dated November 23rd, 1999 by Mr. Glen VanderVeen of Pinnacle Environmental Solution.

Per this report high concentrations of TPHG and MTBE still exist in MW-5 and VW-4 wells. MW-5 well indicated 9,2,00ppb TPHG, 26ppb benzene, and 1,100ppb of MTBE. However, VW-4 well, indicated up to 1,300ppb TPHG, 4.4ppb benzene, and 4,600ppb of MTBE.

Both wells indicate an increase in the concentrations of MTBE. This could be due to the fact that both wells are down-gradient from the former source of contamination.

I concur with the work proposed for the next quarter as indicated in the above report dated November 23rd,1999, by Mr. VanderVeen of Pinnacle Environmental Solution.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek, CA 94596
Files

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

Stid 3942

September 16, 1999

Mr. Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

ENVIRONMENTAL HEALTH SERVICES

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

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Supple:

I have received and reviewed the Quarterly Groundwater Monitoring Report dated August 27, 1999 by Mr. Glen VanderVeen of Pinnacle Environmental Solution.

The laboratory analysis still reveal high concentrations for TPHG and MTBE in MW-5 and VW-4 wells. MW-5 well indicated 11,000ppb TPHG, 33ppb benzene, and 580ppb of MTBE. The VW-4 well, on the other hand, revealed up to 2,100ppb TPHG, 2.5ppb benzene, and 3,300ppb of MTBE.

I understand that MW-1 well was decommissioned back in 1996. However, as you are aware I have not been the case worker on this site for long, and therefore, I would appreciate the logic supporting decommissioning of MW-1. This is due to the fact that the data available indicates constituents' concentrations of up to 11,000ppb of TPHG, 570ppb of benzene, and 25,000ppb of MTBE in MW-1 well for the last known laboratory analysis dated 11-13-95. Additionally, please inform me who approved this activity.

I do concur with the work proposed for the next quarter as indicated in the above report dated August 27th, 1999, by Mr. VanderVeen of Pinnacle Environmental Solution.

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

Sincerely.

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Wainut Creek, CA 94596

Files

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

(510) 337-9335 (FAX)

Stid 3942

July 28, 1999

Mr. Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Supple:

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: 6235 Seminary Ave., Oakland

July 28, 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.

AGENCY



DAVID J. KEARS, Agency Director

RO# 163

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

Stid 3942

March 23, 1999

Mr. Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Supple:

I have received and reviewed the Quarterly Groundwater Monitoring Report dated March 12, 1999 by Mr. Glen VanderVeen of Pinnacle Environmental Solution. However, the detection limits were not set properly for TBA, DIPE, ETBE, TAME, and TPHG for VW-4 well. For instance, the detection limit was set at 5,000ppb for TBA.

Similar to the last laboratory report, MW-5 well and VW-4 well still reveal high concentrations of TPHG and MTBE with reduced concentration indicated for Benzene.

I appreciate the response by Mr. VanderVeen, under the discussion section of the above Quarterly Groundwater Monitoring Report, to my concerns as addressed in the letter dated January 6, 1999.

I do concur with the work proposed for the next quarter as indicated in the report dated March 12, 1999 by Mr. VanderVeen of Pinnacle Environmental Solution.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist C: Mr. Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek, CA 94596 Files

AGENCY



DAVID J. KEARS, Agency Director

RO# 163

ENVIRONMENTAL HEALTH SERVICES

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

Stid 3942

January 7, 1999

Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland

Dear Mr. Supple:

I have received and reviewed the Quarterly Groundwater Monitoring Report dated December 30, 1998 by Mr. Glen VanderVeen of Pinnacle Environmental Solution. The detection limits set for the Benzene, Toluene, Ethyl Benzene, and Xylenes should be set at 0.50 ppb and 50 ppb for TPHG. The above detection limits are not set correctly for some constituents such as TPHG at VW-4 well.

MW-5 well and VW-4 well still reveal high concentrations of TPHG and MTBE. However, the Benzene level seems to be reducing.

I concur with the work proposed for the next quarter as indicated in the report dated December 30, 1998 by Mr. VanderVeen of Pinnacle Environmental Solution.

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek, CA 94596 Files

ALAMEDA COUNTY

HEALTH CARE SERVICES



RE: ARCO Station No 6002 at 6235 Seminary Ave., Oakland



DAVID J. KEARS, Agency Director

Stid 3942

January 6, 1999

Paul Supple ARCO Products Co. PO Box 6549 Moraga, CA 94570

Dear Mr. Supple:

This office has assigned me to review the above referenced site. After a review of the case and discussion with my colleagues, several items have come to my attention. <u>Please</u> address the following:

- 1. Make certain that MTBE level indicated by the lab analysis is not a false positive by performing EPA method 8260.
- 2. According to Cal /EPA's guidelines and Chuck Headlee of Regional Water Quality Control Board (RWQCB) you need to test for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- 3. Inform this office as to whether the air sparging and vapor extraction procedures are still taking place at this site and if so what quantity of the contaminants has been removed, and if not, indicate the reason the remediation has stopped.
- 4. I concur with the work proposed for the next quarter as indicated in the report dated August 3, 1998 by Mr. VanderVeen of Pinnacle Environmental Solution.

Please respond to the above items within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

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

Sincerely.

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Glen VanderVeen, Pinnacle Environmental Solutions, 144-A Mayhew Way, Walnut Creek, CA 94596 Files Ro#163

ENVIRONMENTAL HEALTH SERVICES

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

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

RO63

ENVIRONMENTAL HEALTH SERVICES

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

12 June, 1998 STID 3942

Paul Supple ARCO Products Co. P.O. Box 6549 Moraga, CA 94570

re: ARCO Station 6002, 6235 Seminary Rd., Oakland, 94605

Dear Paul Supple:

This office has received and reviewed the following reports:

- Quarterly Monitoring Report dated September 30, 1997
- Quarterly Monitoring Report dated December 31, 1997
- Quarterly Monitoring Report dated March 31, 1998

These reports were all submitted by you and written by Emcon.

It seems that all contamination still centers around MW5 and VW4. MW-7, the downgradient well for MW-4 was not sampled because it was dry. This well has not always been dry. Perhaps the heavy rains this winter will give different results in your next report.

Have you thought of using ORC (oxygen releasing compound) in the wells with significant contamination remaining?

Please call me if have any questions regarding this letter at 567-6782.

Sincerely

Thomas Peacock, Manager

Environmental Protection Division

c: Gary Messerotes, EMCON, 1921 Ringwood Ave., San Jose, CA 95131

Dick Pantages - Files

LeRoy Griffin, City of Oakland Hazardous Materials



ARCO#6002 6235 SEMINARY AUE. DAKLAND

STID#3942

Ro# 163

DAVID J. KEARS, Agency Director

September 11, 1997 STID 3942

Mike Whelan ARCO Products Co. P.O. Box 612530 San Jose, CA 95161 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Dear Mike Whelan:

This office has received and reviewed a Quarterly Groundwater Monitoring Report dated June 27, 1997 by EMCON. The following comments concern this report:

- There are o conclusions or recommendations in this report, only a statement of next quarter's scheduled work.
- There does not seem to be any degradation in the contamination in MW-5, the most contaminated well. the most downgradient well, has declined in contamination, but only for 1 quarter.

Please contact me at (510) 567-6782 if you have any questions regarding this letter.

Sincerely,

Thomas Peacock, Manager

Valli Voruganti, EMCON, 1921 Ringwood Ave., San Jose, CA C: 95131-1721

Gordon Coleman - Files

AGENCY



DAVID J. KEARS, Agency Director

RO#163

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 (510) 337-9335 (FAX)

May 29, 1997

Paul Supple ARCO Products Co. P.O. Box 6549 Moraga, CA 94570

STID 3942

Re: Investigations at ARCO Station 6002, located at 6235 Seminary Road, Oakland, CA 94605

Dear Mr. Supple,

Firstly, I would like to introduce myself to you. My name is Juliet Shin and I am the Alameda County Hazardous Materials Specialist overseeing investigations at this site. I understand that you are the new ARCO contact person for the above site, and I look forward to working with you.

I have recently reviewed the Fourth Quarter 1996 groundwater monitoring results as well as the April 15, 1997 Well Installation Report for the above site. Based on the fact that Well MW-7 came up dry in the first two attempts at monitoring, this office is requesting that ARCO submit cross sections that would intersect the off-site wells MW-7 and MW-8, along with some of the on-site wells, in the next quarterly monitoring report.

Additionally, please submit information on the Depth-To-Water for Well MW-7 during the January 27, 1997 sampling event. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc:

Ray Kaminsky

EMCON

1921 Ringwood Avenue

San Jose, CA 95131

AGENCY

DAVID J. KEARS, Agency Director



RO# 163

Alameda County CC4580 Environmental Health Services 1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 (510)567-6700 FAX(510)337-9335

June 21, 1996

Mr. Michael Whelan ARCO Products Company 2155 S. Bascom Ave., Ste 202 Campbell, CA 95008

STID 3942

Re: ARCO Service Station 6002, located at 6235 Seminary Ave., Oakland, CA

Dear Mr. Whelan,

This office has reviewed EMCON's April 26, 1996 Tank Removal Report and On-site Tier 2 Risk-Based Corrective Action Evaluation and addendum, dated June 3 and 19, 1996. Based on our review of these reports, the contaminant concentrations at the site appear to be below human health protective thresholds for a 10⁻⁵ risk at a commercial/industrial site. Therefore, based upon the available information, including the current land use, and with the provision that the information provided to this agency was accurate and representative of site conditions, no further corrective action is currently warranted on site. If a change in land use, structural configuration, or site activities are proposed such that more conservative exposure scenarios should be evaluated for on site, this agency must promptly be notified. This does not, however, exempt any potential off-site corrective action work which may be warranted due to the off-site portion of the contaminant plume beneath the adjacent residential properties. It is the understanding of this office that off-site characterization of the contaminant plume will begin in July 1996, and that a risk assessment addressing a residential scenario will subsequently be conducted.

Please be reminded that quarterly groundwater monitoring, elevation contours, and reporting should continue at the site. If you have any questions, please feel free to contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc: John Young, EMCON, 1921 Ringwood Ave., San Jose, CA 95131

Acting Chief-File



Ro# 163 RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577

(510) 567-67**20**

February 14, 1996

Mr. Michael Whelan **ARCO Products Company** 2155 S. Bascom Ave., Ste 202 Campbell, CA 95008

STID 3942

Re:

Tank removal and overexcavation at ARCO Service Station 6002, locted at 6235

Seminary Ave., Oakland, CA

Dear Mr. Whelan,

This office has reviewed EMCON's Overexcavation Sampling Plan, dated February 7, 1996, and the Underground Tank Closure Plans, submitted by Tait & Associates, for the removal of four underground storage tanks at the above site. These plans are acceptable to this office. Please notify this office at least one week prior to beginning field work. Please be reminded to notify the Oakland Fire Department so that they may be present to oversee the tank removals.

Additionally, this office would like a projected schedule for off-site well installation, on-site assessment for potential human health impact, and eventual assessment for any potential off-site human health impacts.

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

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc:

John Young

EMCON

1921 Ringwood Ave. San Jose, CA 95131-1721

Acting Chief-File

AGENCY



RO#163

ALAMEDA COUNTY HEALTH AGENCY DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 HARBOR BAY PARKWAY, SUITE 250 ALAMEDA, CA 94502-6577 (cc 430-451) Ph (510) 567-6700 FAX (510) 337-9335

January 31, 1996

A & S Engineering 45 Quail Court, #303 Walnut Creek, CA 94596

Attention: Tom Piskor

Dear Mr. Piskor:

Subject: Shell Service Station, 6235 Seminary Avenue,

Oakland, CA 94605

After your plans for the above site were approved, it was brought to my attention that the proposed locations where your underground tanks would be installed may be contaminated, since contamination was found on other parts of the property. Therefore, the soil removed during the excavation for the installation of the undergound tanks must be sampled to determine the proper disposal and handling options.

Please submit a proposal as to how the excavated soil will be sampled, stored and disposed of. If you wish , you may instead, amend the "Underground Tank Closure Plan" previously submitted.

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

Sincerely,

Don Hwang,

Hazardous Materials Specialist

DH: cmb

wp/6.0/Piskor

AGENCY

DAVID J. KEARS, Agency Director



October 31, 1995

Mr. Michael Whelan ARCO Products Company 2155 S. Bascom Ave., Ste 202 Campbell, CA 95008 DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway

Alameda, CA 94502-6577 (510) 567-6777

STID 3942

Re:

Investigations at ARCO Station 6002, located at 6235 Seminary Ave., Oakland, California

Dear Mr. Whelan,

Based on the attached letter from the California Regional Water Quality Control Board, the analysis for Methyl Tertiary Butyl Ether (MTBE) should be included in the quarterly sampling events at the above site. According to our files, investigations at the above site were initiated due to a leak from the site's underground storage tanks in 1989. MTBE has been commonly used as an additive in fuels since the early 1980's, so there is the potential for MTBE in the existing groundwater contaminant plume beneath the site.

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

Sincerely

Juliet Shin

Senior Hazardous Materials Specialist

~~ *A*/

David Larsen

EMCON

1921 Ringwood Ave.

San Jose, CA 95131-1721

Acting Chief-File



R0163

RAFAT A. SHAHID, DIRECTOR

October 10, 1995

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo. CA 94402

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway

Alameda, CA 94502-6577 (510) 567-6777

STID 3942

Re:

Investigations at ARCO Station 6002, located at 6235

Seminary Ave., Oakland, California

Dear Mr. Whelan,

Based on the attached letter from the California Regional Water Quality Control Board, the analysis for Methyl Tertiary Butyl Ether (MTBE) should be included in the quarterly sampling events at the above site. According to our files, investigations at the above site were initiated due to a leak from the site's underground storage tanks in 1989. MTBE has been commonly used as an additive in fuels since the early 1980's, so there is the potential for MTBE in the existing groundwater contaminant plume beneath the site.

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

 ${ t Sincerely.}$

Juliet Shin

Senior Hazardous Materials Specialist

cc: David Larsen

EMCON

1921 Ringwood Ave.

San Jose, CA 95131-1721

Acting Chief-File

RAFAT A. SHAHID, Assistant Agency Director

May 31, 1995

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Division 80 Swan Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

STID 3942

Re: Work plan and amendments for the installation of temporary well points at ARCO Station 6002, located at 6235 Seminary Ave., Oakland, California

Dear Mr. Whelan,

This office has reviewed EMCON's March 6, 1995, April 17, 1995, and May 10, 1995 amendments/addendums to the original work plan, dated January 20, 1995 for the above site. These addendums/amendments are acceptable to this office with the following requirements:

- o The Alameda County Flood Control District, Zone 7, requires that the proposed "temporary" well points incorporate a cement grout seal around the casing or pipe from the surface down to 2 feet below ground surface. This seal must be placed in addition to the proposed traffic-rated well vault.
- o Following use of these "temporary" well points, the wells will be required to be destroyed/closed under permit from Zone 7.
- o The "temporary" wells shall be screened adequately above and below the water table to account for seasonal fluctuations. Ideally, monitoring wells shall be screened 5 feet above and 10 feet below the water table.
- o Per the County's February 9, 1995 letter, this office is still waiting on information regarding potential utility line trenches along Sunneymere Avenue, to assure that sample results from proposed Well MW-6 will be accurately assessing the extent of the contaminant plume. Please submit this information before implementing the work.
- o The lithology is to be characterized and a minimum of one soil sample is to be collected for analysis at each of the "temporary" well point locations.

Mr. Michael Whelan

Re: 6235 Seminary Ave.

May 31, 1995 Page 2 of 2

o You shall wait a minimum of 24 hours after developing the wells before purging and sampling them. These wells shall be sampled on a quarterly basis, along with the existing wells. These wells shall also be surveyed to the same benchmark as existing wells and quarterly water level measurements and ground water gradient information shall be collected from these new wells.

o As stated in the work plan addendum, if contaminant concentrations are consistently identified in any of these wells throughout the proposed year of monitoring, permanent wells shall be installed to replace the well(s) and/or to further delineate the extent of the contaminant plume.

The work proposed in the initial work plan and subsequent addendums/amendments shall be implemented within 60 days of the date of this letter. A report documenting the work shall be submitted within 45 days after completing field activities.

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

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc: Peter T. Christianson

EMCON

1921 Ringwood Ave.

San Jose, CA 95131-1721

File

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

RO 163

RAFAT A. SHAHID, Assistant Agency Director

February 9, 1995

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402 ALAMEDA COUNTY CC 430-4510 DEPT. OF ENVIRONMENTAL HEALTH ENVIRONMENTAL PROTECTION DIVISION 1131 HARBOR BAY PKWY., RM.250 ALAMEDA, CAL. 94502-6577

STID 3942

Re: Work plan for investigations at ARCO Service Station 6002, located at 6235 Seminary Ave., Oakland, California

Dear Mr. Whelan,

This office has reviewed EMCON's work plan, dated January 20, 1995, for the above site. To this date, elevated levels of TPHg and BTEX have been identified in both soil and ground water samples collected from on-site monitoring wells, MW-1 and MW-5. Additionally, elevated contaminant levels were also identified in "grab" ground water samples collected from vapor wells VW-1 and VW-2. Although EMCON has proposed to delineate the upgradient extent of the ground water contaminant plume with Well MW-6, and the downgradient extent of the plume with two wells, MW-7 and MW-8, the proposed downgradient wells are located approximately 200 feet from the most downgradient on-site monitoring well, MW-5, which has also consistently identified the highest contaminant concentrations on site. Information gathered from these proposed downgradient wells may not be sufficient to adequately characterize the plume. If contaminant concentrations were not identified in proposed wells MW-7 and MW-8, it would still not reflect the behavior of the plume within 200 feet from the site, beneath the residential area. If contaminants concentrations were to be detected in Wells MW-7 and MW-8, it would not be certain whether those concentrations were resulting from another off-site source.

This office is requiring that downgradient wells be installed closer to the site, at least within 100 feet downgradient from Well MW-5, in order to better characterize the plume's behavior and the local ground water gradient behavior. Delineation of the soil contamination observed in Well MW-5 should also be addressed. An addendum to the work plan, addressing these concerns, shall be submitted to this office within 45 days of the date of this letter.

Prior to installing the proposed upgradient well, MW-6, on the east side of Sunneymere Avenue, a utility line check should be conducted in order to insure that utility trenches are not

Mr. Michael Whelan

Re: 6235 Seminary Ave.

February 9, 1995

Page 2 of 2

intercepting or redirecting the contaminant plume. Utility checks should be incorporated as standard procedure in any situation where wells are proposed along streets.

The work plan addendum, and all future reports shall be accompanied by a cover letter signed by the Responsible Party acknowledging review of and concurrence with the report. If possible, the next quarterly report should also include some conclusions as to why the highest contaminant concentrations on site are being observed in Well MW-5. Where is the potential source of this observed contamination?

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

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc: Robert K. Davis

EMCON

. 1921 Ringwood Ave.

San Jose, CA 95131-1721

Edgar Howell

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

R0163

RAFAT A. SHAHID, Assistant Agency Director

October 26, 1994

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402 ALAMEDA COUNTY CC4580 DEPT. OF ENVIRONMENTAL HEALTH ENVIRONMENTAL PROTECTION DIVISION 1131 HARBOR BAY PKWY., #250 ALAMEDA CA 94502-6577

STID 3942

Re: Inve

Investigations at ARCO Station 6002, located at 6235 Seminary Ave., Oakland, California

Dear Mr. Whelan,

This office has reviewed GeoStrategies Inc.'s Subsurface Investigations report for the above site. Elevated levels of TPHg and BTEX concentrations were identified in both the soil and ground water samples collected from the MW-5 location. This well appears to be downgradient to crossgradient of operations on the site, according to the potentiometric map.

Per Article 11 Title 23 California Code of Regulations, you are required to delineate the extent of the soil and ground water contamination observed at the site. Therefore, the downgradient extent of the contamination identified in MW-5 is required to be delineated. Additionally, elevated levels of TPHg and BTEX concentrations were identified in the "grab" ground water sample collected from location VW-2. Although this location appears to be upgradient of on-site activities, it is still uncertain whether this contamination is resulting from on site or off site. Based on this uncertainty, further investigations are required to investigate the extent of this ground water contamination.

This office is requesting that you submit a work plan addressing the above issues. This work plan should be submitted within 90 days of the date of this letter. This is a formal request for a technical report, per Section 2722(c), Article 11 Title 23 California Code of Regulations.

If you have any questions or comments, please contact me at (510) 567-6700.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

Mr. Michael Whelan

Re: 6235 Seminary Ave.

October 26, 1994

Page 2 of 2

Barbara Sieminski cc:

GeoStrategies, Inc. 6747 Sierra Court, Ste G Dublin, CA 94568

Edgar Howell

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

June 2, 1994

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402

STID 3942

Re: Work plan for investigations at ARCO Station #6002, located at 6235 Seminary Avenue, Oakland, California

Dear Mr. Whelan,

This office has reviewed GeoStrategies' work plan, dated May 18, 1994, addressing the installation of additional wells at the above site. This work plan is acceptable to this office. Please be reminded to wait a minimum of 24 hours after installing the wells, before developing them, and a minimum of 24 hours after developing the wells, before sampling them.

It is the understanding of this office that field work shall commence within 60 days of the date of this letter, and that a report documenting the work shall be submitted within 45 days after completing field activities.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Mr. Joel Coffman

GeoStrategies Inc.

6747 Sierra Court, Ste G

Dublin, CA 94568

Edgar Howell-File(JS)

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

April 14, 1994

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402

STID 3942

Re: Investigations at ARCO Station 6002, located at 6235 Seminary Avenue, Oakland, California

Dear Mr. Whelan,

This office has reviewed RESNA's Initial Onsite Subsurface Investigation Report, dated March 31, 1994. Soil and ground water samples collected from the recently installed monitoring and vapor extraction wells identified elevated levels of gasoline and BTEX. As you are probably aware, in the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells are required to verify the ground water gradient direction. In the case of this site, there do not appear to be any adjacent sites with monitoring wells, therefore, you are required to install two additional monitoring wells at the site. These wells may also assist in delineating the extent of the ground water contaminant plume, which is a requirement of Article 11, Title 23 California Code of Regulations.

Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed on a quarterly basis. Water level measurements and corresponding ground water gradient determinations are to be conducted on a monthly basis, for the first 12 months, to fully characterize the behavior of ground water flow.

A work plan addressing the installation of the two additional monitoring wells must be submitted within 45 days of the date of this letter. Once the work plan is approved, field work shall commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly. Such quarterly reports are due the first day of the second month of each subsequent quarter.

Mr. Michael Whelan

Re: 6235 Seminary Ave.

April 14, 1994 Page 2 of 2

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well constructionlogs, water level data, chain-of-custody forms, laboratory results for all smaples collecte and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations for plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to Section 2722 (c)(d) of Title 23 California Code of Regulations. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Erin Krueger

RESNA

3315 Almaden Expressway, Ste 34

San Jose, CA 95118

Edgar Howell-File(JS)

R0163

RAFAT A. SHAHID, ASST, AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

State Water Resources Control Board Division of Clean Water Programs

> UST Local Oversight Program 80 Swan Way, Rm 200

> > Oakland, CA 94621

(510) 271-4530

December 15, 1993

DAVID J. KEARS, Agency Director

T. Brignoni ARCO Products Co. P.O. Box 6038 Artesia, CA 90702-6038

STID 3942

Work plan for ARCO Station 6002, located at 6235 Seminary Re: Avenue, Oakland, California

Dear Mr. Brignoni,

This office has reviewed RESNA's work plan, dated November 16, 1993, for preliminary soil and ground water investigations at the above site. This work plan is acceptable to this office with the following reminders/requirements:

- If soil contamination is identified at fairly deep depths and ground water is not observed above 50 feet below ground surface (bgs), boring MW-1 must still be drilled deeper than 50 feet bgs to confirm that the soil contamination is not leaching into existing ground water.
- Please be reminded to screen the monitoring well adequately above and below the water table to account for seasonal fluctuations.
- After installing the well, please be reminded to wait a minimum of 24 hours before developing the well. After developing the well, please wait a minimum of 24 hours before purging and sampling the well.
- If any soil or ground water contamination is identified, you may be required to install two additional monitoring wells for quarterly ground water gradient determinations.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Mr. T. Brignoni

Re: 6235 Seminary Ave.

December 15, 1993 Page 2 of 2

Erin D. Krueger cc:

RESNA

3315 Almaden Expressway, Ste 34 San Jose, CA 95118

Edgar Howell-File(JS)