

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
6-14-04

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

June 11, 2004

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd.  
Oakland, CA 94605

Dear Mr. Sekhon:

Subject: Fuel Leak Case No. RO0000175, Beacon Station, 6600 Foothill Blvd., Oakland, CA

Alameda County Environmental Health staff has reviewed "Response to your technical comments and Work Plan Addendum" dated March 30, 2004 and "Quarterly Groundwater Monitoring and Sampling Report" dated May 14, 2004, both by Advanced Assessment and Remediation Services. Copies of documents requested from your consultant were submitted previously as indicated. We generally concur with the work proposed. We request that you incorporate the following technical comments as discussed, perform the requested work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

1. Site Characterization - Instead, temporary wells including SB-5/TW and SB-6/TW will be located as a transect approximately 20 feet apart across the property. Depth discrete grab groundwater samples will be collected.
2. Source Characterization - Soil samples from borings will include those at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination.

#### TECHNICAL REPORT REQUESTS

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

- July 31, 2004 - Quarterly Groundwater Monitoring and Sampling Report, 2<sup>nd</sup> Quarter 2004
- August 11, 2004 - Soil and Water Investigation Report
- October 31, 2004 - Quarterly Groundwater Monitoring and Sampling Report, 3<sup>rd</sup> Quarter 2004
- January 31, 2005 - Quarterly Groundwater Monitoring and Sampling Report, 4<sup>th</sup> Quarter 2004
- April 30, 2005 - Quarterly Groundwater Monitoring and Sampling Report, 1st Quarter 2005

Mr. Sekhon  
June 11, 2004  
Page 2 of 2

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio St.,  
Suite 202, Concord, CA 94520  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
02-09-04

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

February 6, 2004

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd.  
Oakland, CA 94605

Dear Mr. Sekhon:

Subject: Fuel Leak Case No. RO0000175, Beacon Station, 6600 Foothill Blvd., Oakland, CA

Alameda County Environmental Health staff has disapproved "Work Plan for Site Characterization" dated July 2, 2003, by Advanced Assessment and Remediation Services. We request that you address the following technical comments and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. Site Characterization - The Work Plan proposes to install 4 temporary wells, located on the property on the other side of Foothill Blvd. Instead, we feel that a transect of depth discrete grab groundwater sampling would be more appropriate. Please include your amended proposal to delineate the plume in the Work Plan Addendum requested below.
2. Source Characterization - The Work Plan proposes to install 3 borings, SB-7, SB-8, and SB-9, to the sides and at the downgradient end of the removed underground tank. The 20 feet depths proposed appear to be inadequate. Minimum depths will usually be 25 - 30 feet. Indicate how depths adequate for vertical delineation will be determined. Please provide the information requested in the Work Plan Addendum.
3. Site Plan - Not to scale. Please draw to scale.
4. 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.
5. Oakland Fire Services Tank Removal Inspection - Please submit the report dated December 16, 1998.
6. Laboratory report of Tank Removal Water Sample - The legibility of the fax copy of the laboratory report dated January 3, 1999 was poor. Please submit another copy.

Mr. Sekhon  
February 6, 2004  
Page 2 of 2

## TECHNICAL REPORT REQUESTS

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

April 6, 2004 - Work Plan Addendum & Reports

60 days after Work Plan approval – Soil and Water Investigation Report

April 30, 2004 - Quarterly Groundwater Monitoring and Sampling Report, 1st Quarter 2004

July 31, 2004 – Quarterly Groundwater Monitoring and Sampling Report, 2<sup>nd</sup> Quarter 2004

October 31, 2004 - Quarterly Groundwater Monitoring and Sampling Report, 3<sup>rd</sup> Quarter 2004

January 31, 2005 - Quarterly Groundwater Monitoring and Sampling Report, 4<sup>th</sup> Quarter 2004

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio St.,  
Suite 202, Concord, CA 94520  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



4-30-03  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

April 29, 2003

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd.  
Oakland, CA 94605

RE: Fuel Leak Case No. RO0000175, Beacon Station, 6600 Foothill Blvd., Oakland, CA

**LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS**

Dear Mr. Sekhon:

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.

Mr. Sekhon  
April 29, 2003  
Page 2 of 2

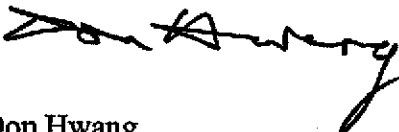
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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) 567-6746 should you have any questions about the content of this letter.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Donna Drogos  
File

Enclosures (2)

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

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Name of local agency  
Street address  
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(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

**SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY**

---

Name of local agency  
Street address  
City

**SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR (*Site Name and Address*)**

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



41-30-03  
ENVIRONMENTAL HEALTH SERVICES  
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(510) 567-6700  
FAX (510) 337-9335

April 28, 2003

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd.  
Oakland, CA 94605

Dear Mr. Sekhon:

Subject: Fuel Leak Case No. RO0000175, Beacon Station, 6600 Foothill Blvd., Oakland, CA

Alameda County Environmental Health staff has reviewed the fax dated April 17, 2003, which shows the boring locations proposed, by Advanced Assessment and Remediation Services. In addition to the comments in our letter of October 29, 2002, we request that you address the following technical comments and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. Site Characterization - The lateral and vertical extent of your dissolved contaminant plume is undefined offsite south of Foothill Blvd. Up to 9,680 ug/l TPH-G and 37,600 ug/l MTBE have been detected in onsite monitoring wells located along the site's southern boundary. Up to 12,000 ug/l TPH-G, 432 ug/l Benzene, and 18,600 ug/l MTBE have been detected in offsite downgradient wells. The proposal for the groundwater monitoring well is disapproved because we feel that it would be premature to install more monitoring wells without additional grab groundwater sampling to determine the location of the plume for optimal well locations and the preferential pathway studies did not yield sufficient information to determine if the contaminant plume would be intercepted by utilities or wells. We request that you use depth discrete grab groundwater sampling. Include your amended proposal to delineate the plume in the Work Plan Addendum requested below.
2. Source Characterization - Up to 16,300 mg/kg Total Petroleum Hydrocarbons-Gasoline (TPH-G), 4,290 mg/kg methyl tertiary-butyl ether (MTBE), and 140 mg/kg benzene, were detected in contaminated soil collected from borings. Thus, the source areas have not been delineated. We request that you propose additional borings to delineate the lateral and vertical extent of soil contamination in the source areas. The findings will determine if additional soil or groundwater sampling is needed. Please propose boring locations in the Work Plan Addendum requested below.

- 3 . Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site.
  - a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan Addendum requested below.
  - b) Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map and tabulate well construction details for each well. Please submit with the Work Plan Addendum requested below.
- 4 . 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.
- 5 . Oakland Fire Services Tank Removal Inspection – Please submit the report dated December 16, 1998.
- 6 . Laboratory report of Tank Removal Water Sample - The legibility of the fax copy of the laboratory report dated January 3, 1999 was poor. Please submit another copy.

#### TECHNICAL REPORT REQUESTS

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

June 2003 - Work Plan Addendum & Reports

60 days after Work Plan approval – Soil and Water Investigation Report

July 31, 2003 – Quarterly Groundwater Monitoring and Sampling Report, 2<sup>nd</sup> Quarter 2003

October 31, 2003 - Quarterly Groundwater Monitoring and Sampling Report, 3<sup>rd</sup> Quarter 2003

January 31, 2004 - Quarterly Groundwater Monitoring and Sampling Report, 4<sup>th</sup> Quarter 2003

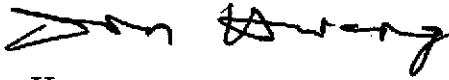
April 30, 2004 - Quarterly Groundwater Monitoring and Sampling Report, 1st Quarter 2004

Mr. Sekhon  
April 29, 2003  
Page 3 of 3

3

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio St.,  
Suite 202, Concord, CA 94520  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

**STID 3985**

October 29, 2002

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

**Re: Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon:

This office is in receipt of "Additional Site Investigation" document dated September 6, 2002 submitted by Mr. Tridib K. Guha of Advanced Assessment and Remediation Services regarding the above referenced site. I have reviewed and discussed the above document, which was the result of a required workplan, with Mr. Guha. Please note the following comments:

- Per this document, five soil borings were installed, SB-1, SB-2, and MW-4 through MW-6 wells. Three of the borings (MW-4 through MW-6) were turned into permanent monitoring wells while SB-1 and SB-2 were turned into temporary wells.
- Soil sampling revealed the highest concentration of TPHg and Benzene in soil within MW-6 soil boring at 16,300 ppm and 138ppm respectively at 10 feet. The highest concentration of MTBE in soil was noted in MW-5 boring at 4,290 ppm at the depth of 10 feet bgs.
- Groundwater sampling revealed the highest concentration of TPHg and Benzene at 12,000ppb and 432ppb respectively within MW-6 well. The highest concentration of MTBE in groundwater was encountered in MW-2 well at 94,000 ppb.
- There is an error within this report on page 6 and Figure 3 regarding the groundwater flow gradient direction. Figure 3 within this report draws a southerly flow direction. However, page 6 of the above document indicates a southwesterly direction at 0.014 ft/ft. please correct this error with the next report.
- Averaged depth to groundwater, once stabilized, has been calculated to be at 8.5 feet bgs.
- I concur with the recommendation made by Mr. Guha regarding performance of a feasibility studies and groundwater quarterly monitoring as specified. However, additionally you need to further delineate plume specifically south of the site as well as performance of preferential pathway studies in the same location since the plume has indeed traveled off-site affecting the neighboring property.

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

Sincerely,

A handwritten signature in black ink that reads "Amir K. Gholami". The signature is written in a cursive style and is underlined with a single horizontal line.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Mr. Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio Street,  
Suite 202, Concord, CA 94520  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



10-31-02  
1

10/15

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

**STID 3985**

October 29, 2002

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

**Re: Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon:

This office is in receipt of "Additional Site Investigation" document dated September 6, 2002 submitted by Mr. Tridib K. Guha of Advanced Assessment and Remediation Services regarding the above referenced site. I have reviewed and discussed the above document, which was the result of a required workplan, with Mr. Guha. Please note the following comments:

- Per this document, five soil borings were installed, SB-1, SB-2, and MW-4 through MW-6 wells. Three of the borings (MW-4 through MW-6) were turned into permanent monitoring wells while SB-1 and SB-2 were turned into temporary wells.
- Soil sampling revealed the highest concentration of TPHg and Benzene in soil within MW-6 soil boring at 16,300 ppm and 138ppm respectively at 10 feet. The highest concentration of MTBE in soil was noted in MW-5 boring at 4,290 ppm at the depth of 10 feet bgs.
- Groundwater sampling revealed the highest concentration of TPHg and Benzene at 12,000ppb and 432ppb respectively within MW-6 well. The highest concentration of MTBE in groundwater was encountered in MW-2 well at 94,000 ppb.
- There is an error within this report on page 6 and Figure 3 regarding the groundwater flow gradient direction. Figure 3 within this report draws a southerly flow direction. However, page 6 of the above document indicates a southwesterly direction at 0.014 ft/ft. please correct this error with the next report.
- Averaged depth to groundwater, once stabilized, has been calculated to be at 8.5 feet bgs.
- I concur with the recommendation made by Mr. Guha regarding performance of a feasibility studies and groundwater quarterly monitoring as specified. However, additionally you need to further delineate plume specifically south of the site as well as performance of preferential pathway studies in the same location since the plume has indeed traveled off-site affecting the neighboring property.

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

Sincerely,

A handwritten signature in black ink that reads "Amir K. Gholami". The signature is written in a cursive style and is positioned above a horizontal line.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Mr. Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio Street,  
Suite 202, Concord, CA 94520  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



B-28-02  
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20175

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

STID 3985

March 13, 2002

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

**Re: Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon:

I have received and reviewed the work plan dated January 18, 2002 submitted by Mr. Tridib K. Guha of Advanced Assessment and Remediation Services concerning the above referenced property. I have also discussed the above workplan with Mr. Guha. This work plan was submitted due to the findings within "Groundwater Quality Investigation" document dated July 24, 2001, prepared by Mr. Tridib K. Guha of Advanced Assessment and Remediation Services regarding the above referenced site.

As you are aware, the July 24, 2001 report indicated increased quantities of contaminants in soil and groundwater specifically around MW-2 well. The soil boring at 8 feet indicated up to 870 ppm, 0.29 ppm, and 4.3 ppm of TPHg, MTBE, and Benzene respectively. Additionally, the MW-2 well indicated high concentrations of MTBE at 94,000ppb as well as 5,800ppb and 160ppb of TPHg and Benzene respectively. Furthermore, some contaminants, such as MTBE, were also detected within MW-3 and MW-1 wells at 450ppb and 130ppb respectively.

Having reviewed the above workplan, this office requested to further define the vertical and horizontal extent of plume and to come up with potential alternatives to actively remediate the high concentrations of contaminants such as MTBE.

This office concurs with Mr. Guha of Advanced Assessment and Remediation Services regarding further investigation in order to define the plume on site and off site in shallow and deeper aquifer, performance of preferential pathway investigation, performance of well survey, and initiation of quarterly groundwater monitoring by installment of monitoring wells as well as soil boring/temporary wells.

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist



CC: Mr. Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio Street,  
Suite 202, Concord, CA 94520  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



GREEN

9-10-01

PO175

STID 3985

September 7, 2001

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

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

**Re: Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon:

As you are aware, I made a site visit on September 5<sup>th</sup>, 2001 and discussed the issues with your wife, who was present at the site. I have also received and reviewed "Groundwater Quality Investigation" document dated July 24, 2001, prepared by Mr. Tridib K. Guha of Advanced Assessment and Remediation Services regarding the above referenced site.

Per this report the concentrations of contaminants in soil and groundwater is highest around MW-2 well. The soil boring at 8 feet indicated up to 870 ppm, 0.29 ppm, and 4.3 ppm of TPHg, MTBE, and Benzene respectively. However this concentration, event though higher than the other boring results, does not correlate with gasoline pattern as indicated.

The MW-2 indicated high concentrations of MTBE at 94,000ppb. Additionally, there were 5,800ppb and 160ppb of TPHg and Benzene within MW-2 well.

MW-3 well and MW-1 well indicated 450ppb and 130ppb of MTBE respectively.

Figure 3 within this report indicates a southeasterly groundwater flow gradient of 0.05 ft/ft.

I concur with Mr. Guha regarding further investigation in order to define the plume on site and off site in shallow and deeper aquifer, performance of preferential pathway investigation, and initiation of quarterly groundwater monitoring.

Should you have any question, please contact me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Mr. Tridib K. Guha, Advanced Assessment and Remediation Services, 2380 Salvio Street,  
Suite 202, Concord, CA 94520  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 7-21-2000

1

20175

Stid 3985

July 20, 2000

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

**Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**


Dear Messrs. Sekhon and Farrokhtala:

I just spoke with Mr. Greg Brown of P & D Environmental, your consultant, who informed me of a letter dated September 1, 1999, which had been supposedly sent to this office in the past. This letter addresses some of the issues, which I had raised previously including the groundwater flow gradient, which will be investigated during the monitoring well installation, tests for other oxygenates beside MTBE, and the issue of reimbursement from the State Fund. Additionally address the MTBE issue raised in my previous letter dated July 19<sup>th</sup>, 2000. Please be advised that it is imperative that you immediately begin implementation of the clean up process, installation of the monitoring wells, and to comply with the requirements per all previous correspondences from this office.

**Please comply with all the requirements indicated per my letter dated July 19<sup>th</sup>, 2000, and above within 30 days or by August 19<sup>th</sup>, 2000.**

Please contact me at (510) 567-6876, if you have any questions or comments,

Sincerely,

  
Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
Files

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 7-25-2000

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20175

Stid 3985

July 19, 2000

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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(510) 567-6700  
FAX (510) 337-9335

**Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Messrs. Sekhon and Farrokhtala:

This office has yet to receive any response to my previous correspondence. As you are aware, I reviewed and discussed the necessary work regarding the above referenced site on May 26<sup>th</sup>, 1999. Additionally, the State of California has been focusing on MTBE contaminated sites. Our office has been required to investigate and prioritize the sites contaminated with high concentrations of MTBE. Based on the last report there was 220,000 ppb of MTBE present in your groundwater. Please ensure that your underground tank system is tested and tight if applicable and provide the following information to this office:

- The last known concentration of MTBE in soil
- The last known concentration of MTBE in ground water
- Submit a workplan to remediate the high concentration of MTBE.
- Explain how you concluded that the ground water flow gradient was to be south-south easterly direction. This information is necessary for proper placement of the monitoring wells MW-1, MW-2, and MW-3 on the subject site.
- Per Cal /EPA and Regional Water Quality Control Board's (RWQCB) guidelines, you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- Testing for the presence of "other Oxygenates" (such as TAME, DIPE, ETBE, TBA, EDB, and EDC), which shall be accomplished on the 2<sup>nd</sup> quarterly monitoring analysis as agreed upon by this office previously. This office has not yet received this document.

**Please respond to the above items within 30 days or by August 19<sup>th</sup>, 2000.**


Additionally, in my previous correspondence, I indicated that the groundwater flow file review by Mr. King did not reveal much information at all and that I am still unclear as to how Mr. King came up with the groundwater flow gradient as south-south easterly with one of the reviewed site assuming the groundwater flow gradient to be southwesterly.

Furthermore, Mr. King informed me of your financial situation and the "UST Fund" status. I acknowledged your financial status and the fact that even though a letter of commitment has already been issued by the "UST Fund"; there is a usual delay till the fund disburses money for the approved sites.

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) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



1

20175

Stid 3985

July 19, 2000

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

ENVIRONMENTAL HEALTH SERVICES

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

**Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Messrs. Sekhon and Farrokhtala:

This office has yet to receive any response to my previous correspondence. As you are aware, I reviewed and discussed the necessary work regarding the above referenced site on May 26<sup>th</sup>, 1999. Additionally, the State of California has been focusing on MTBE contaminated sites. Our office has been required to investigate and prioritize the sites contaminated with high concentrations of MTBE. Based on the last report there was 220,000 ppb of MTBE present in your groundwater. Please ensure that your underground tank system is tested and tight if applicable and provide the following information to this office:

- The last known concentration of MTBE in soil
- The last known concentration of MTBE in ground water
- Submit a workplan to remediate the high concentration of MTBE.
- Explain how you concluded that the ground water flow gradient was to be south-south easterly direction. This information is necessary for proper placement of the monitoring wells MW-1, MW-2, and MW-3 on the subject site.
- Per Cal /EPA and Regional Water Quality Control Board's (RWQCB) guidelines, you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- Testing for the presence of "other Oxygenates" (such as TAME, DIPE, ETBE, TBA, EDB, and EDC), which shall be accomplished on the 2<sup>nd</sup> quarterly monitoring analysis as agreed upon by this office previously. This office has not yet received this document.

**Please respond to the above items within 30 days or by August 19<sup>th</sup>, 2000.**


Additionally, in my previous correspondence, I indicated that the groundwater flow file review by Mr. King did not reveal much information at all and that I am still unclear as to how Mr. King came up with the groundwater flow gradient as south-south easterly with one of the reviewed site assuming the groundwater flow gradient to be southwesterly.

Furthermore, Mr. King informed me of your financial situation and the "UST Fund" status. I acknowledged your financial status and the fact that even though a letter of commitment has already been issued by the "UST Fund"; there is a usual delay till the fund disburses money for the approved sites.

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) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0175

Stid 3985

July 28, 1999

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

ENVIRONMENTAL HEALTH SERVICES

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

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Sekhon and Mr. Farrokhtala:

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: 6600 Foothill Blvd., Oakland

July 28, 1999

Page 2 of 2

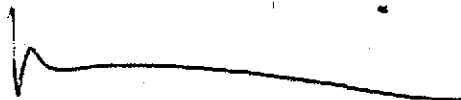
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



1

ROTS

Stid 3985

June 22, 1999

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

ENVIRONMENTAL HEALTH SERVICES

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

**Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon and Mr. Farrokhtala:

As you are aware, I reviewed and discussed the necessary work regarding the above referenced site on May 26<sup>th</sup>, 1999. In the correspondence, I indicated that the groundwater flow file review by Mr. King did not reveal much information at all and that I am still unclear as to how Mr. King came up with the groundwater flow gradient as south-south easterly with one of the reviewed site assuming the groundwater flow gradient to be southwesterly.

Additionally Mr. King informed me of your financial situation and the "UST Fund" status. I acknowledged your financial status and the fact that even though a letter of commitment has already been issued by the "UST Fund"; there is a usual delay till the fund disburses money for the approved sites.

It was based on this understanding that I agreed to postpone the monitoring well installation requirement and the others till the fund reimburses your previous cleanup work. However, this postponement was contingent upon receipt of a written commitment by you, within 10 days, to complete the approved workplan once the fund reimburses your cost for the first phase of the work.

To this date, this office has not received any such commitment by you.

I just like to remind you of the previous requirements, which have not yet been addressed properly for your reference:

- Explain how you concluded that the ground water flow gradient was to be south-south easterly direction. This information is necessary for proper placement of the monitoring wells MW-1, MW-2, and MW-3 on the subject site.
- Per Cal /EPA and Regional Water Quality Control Board's (RWQCB) guidelines, you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.

STID 3985  
June 22<sup>nd</sup>, 1999

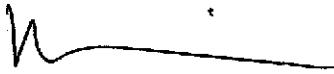
- Testing for the presence of "other Oxygenates" (such as TAME, DIPE, ETBE, TBA, EDB, and EDC), which shall be accomplished on the 2<sup>nd</sup> quarterly monitoring analysis as agreed upon by this office previously.

Please submit the letter of commitment within 10 days or by 7/12/99. Additionally please inform this office of the status of the "UST Fund" in regard to the above referenced site.

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.

Please contact me at (510) 567-6876, If you have any questions or comments

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



1

AGENCY

DAVID J. KEARS, Agency Director

R0175

Stid 3985

May 26, 1999

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

ENVIRONMENTAL HEALTH SERVICES

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

**Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon and Mr. Farrokhtala:

I am in receipt of the "Tank Closure Documentation" as well as the letter dated May 5, 1999, submitted by Mr. Paul King of P & D Environmental. Thank you for the submittal of the "Tank Closure Documentation" and discussion regarding the groundwater flow direction estimation as requested through my previous correspondence. However, the groundwater flow file review by Mr. King did not reveal much information at all. I am still unclear as to how Mr. King came up with the groundwater flow gradient as south-south easterly with one of the reviewed site assuming the groundwater flow gradient to be southwesterly.

Additionally Mr. King informed me of your financial situation and the "UST Fund" status. I understand that a letter of commitment has already been issued by the UST Fund and that there is a usual delay till the fund disburses money for the approved sites. Therefore, I am willing to postpone the monitoring well installation requirement and the others till the fund reimburses your previous cleanup work contingent upon receipt of a written commitment by you, within 10 days, to complete the approved workplan once the fund reimburses your cost for the first phase of the work.

I just like to remind you of the previous requirements, which have not yet been addressed properly for your reference:

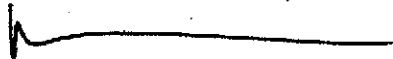
- Explain how you concluded that the ground water flow gradient was to be south-south easterly direction. This information is necessary for proper placement of the monitoring wells MW-1, MW-2, and MW-3 on the subject site.
- Per Cal /EPA and Regional Water Quality Control Board's (RWQCB) guidelines, you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.

Additionally, per my previous discussion and request by Mr. King, the testing for the presence of "other Oxygenates" (such as TAME, DIPE, ETBE, TBA, EDB, and EDC) shall be accomplished on the 2<sup>nd</sup> quarterly monitoring analysis.

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.

Please contact me at (510) 567-6876, if you have any questions or comments

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



1

RO# 175

Stid 3985

April 16, 1999

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

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

**Re: the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon and Mr. Farrokhtala:

As you are aware, I sent you a letter on March 11, 1999. In that letter several items were indicated in response to the Preliminary Site Assessment (PSA) work plan submitted by Mr. Paul King of P & D Environmental. As indicated previously, this office concurs with the proposed plan to proceed further with the investigation of the subject site. However, this office inquired the following issues:

- Explain how you concluded that the ground water flow gradient was to be south-south easterly direction. This information is necessary for proper placement of the monitoring wells MW-1, MW-2, and MW-3 on the subject site.
- According to Cal /EPA's guidelines and Regional Water Quality Control Board (RWQCB) you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- This office has not received a tank closure report with all pertinent information such as, the tank manifest, field observations, locations of samples, etc. Please submit this document.

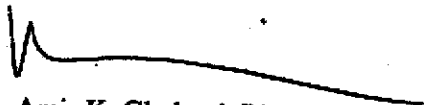
Per my discussion and request by Mr. Paul King the following schedule has been agreed upon:

1. Submittal of the "UST closure report" shall be postponed to April 30<sup>th</sup>, 1999.
2. Testing for the presence of "other Oxygenates" (such as TAME, DIPE, ETBE, TBA, EDB, and EDC) shall be accomplished on the 2<sup>nd</sup> quarterly monitoring analysis.
3. Prior to monitoring wells placement, the groundwater flow gradient shall be researched properly.

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) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

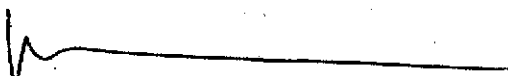
CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
files

groundwater that is generated from this work will be overseen by this office. In addition, You were also advised to contact Cheryl Gordon at (916)-227-4539 with any questions regarding State Trust fund.

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) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611  
files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



1

RO# 175

Stid 3985

March 11, 1999

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd. Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

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

**Re: Submitted work plan dated 3/10/99 by P& D regarding the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA**

Dear Mr. Sekhon and Mr. Farrokhtala:

I have received and reviewed the work plan dated 3/10/99 submitted by P& D Environmental. This work plan was submitted as requested by this office regarding the PSA, Preliminary Site Assessment, on January 12, 1999. This office concurs with the proposed plan to proceed further with the investigation of the subject site. However, please address the following:

- Explain how you concluded that the ground water flow gradient was to be south-south easterly direction. This information is necessary for proper placement of the monitoring wells MW-1, MW-2, and MW-3 on the subject site.
- According to Cal /EPA's guidelines and Regional Water Quality Control Board (RWQCB) you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- This office has not received a tank closure report with all pertinent information such as, the tank manifest, field observations, locations of samples, etc. Please submit this document.

Please respond to the above within 30 days from the receipt of this letter. The plan implementation is to commence within 60 days once the above issues are addressed. 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 until this office approves a change in sampling frequency or the site qualifies for closure. Such quarterly reports are due the first day of the second month of each subsequent quarter.

In my letter dated January 12, 1999 you were informed that any work relating to the 1998 UST upgrade requirements will be overseen by the City of Oakland but any contaminated soil or

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



1

Ro# 175

Stid 3985

January 12, 1999

Ravi Sekhon  
Beacon Station  
6600 Foothill Blvd.  
Oakland, CA

Javad Farrokhtala  
Javad Enterprises  
3300 Powell Street No 209  
Emeryville, CA 94608

ENVIRONMENTAL HEALTH SERVICES

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

Re: Required investigations at the Beacon Station, located at 6600 Foothill Blvd., Oakland, CA

Dear Mr. Sekhon and Mr. Farrokhtala:

As you are aware on December 16, 1998, one 8,000-gallon Gasoline Underground Storage Tank (UST) was removed from the above site. Five soil samples were collected from the site two from the tank pit and three from the island areas. Groundwater was observed in the tank pit at 8-feet below ground surface (bgs). The groundwater and soil samples were analyzed for Total Petroleum Hydrocarbons as Gasoline (TPHG), Methyl Tertiary Butyle Ether (MTBE), benzene, toluene, ethylbenzene, and total xylenes (BTEX). Analysis results of the groundwater samples identified 21,000 parts per billion (ppb) TPHG, 420ppb benzene, 72ppb ethylbenzene, 530ppb toluene, 7400ppb total xylenes, and 220,000ppb MTBE. Analysis results of the soil samples identified up to 12 ppm MTBE and non-detect levels of BTEX.

Per Article 11, Division 3, Chapter 16, Title 23 of the California Code of Regulations, you are required to conduct a Preliminary Site Assessment (PSA) to determine the lateral and vertical extent and severity of soil and groundwater contamination which has resulted from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The major elements of such an investigation, include, but are not limited to, the following:

- At least one groundwater monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of data identifying the local confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.
- Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark (mean sea level, MSL), with an accuracy of 0.01 foot. Groundwater samples are to be collected and analyzed quarterly.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. All reports and proposals must be submitted under a seal of a California -Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

The PSA proposal is due within 60 days of date of this letter by March 9, 1999. Once the proposal is approved, field work should 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 until this office approves a change in sampling frequency or the site qualifies for closure. Such quarterly reports are due the first day of the second month of each subsequent quarter.

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

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

Additionally, per our discussion, you are required to submit a tank closure report which includes all pertinent data such as the tank manifest, field observations, locations of samples, etc.

Per our conversation, any work relating to the 1998 UST upgrade requirements will be overseen by the City of Oakland. However, any contaminated soil or groundwater that is generated from this work will be overseen by this office.

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

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund  
P.O. Box 944212  
Sacramento, CA 944212  
Telephone: (916)227-4307

You are also advised to contact Cheryl Gordon at (916)-227-4539 with any questions regarding State Trust fund.

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) 567-6876.

Sincerely,



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

**CC: Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611**  
**Files**