

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
09-07-06

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

September 6, 2006

Mr. Jay Asercion
Kaiser Foundation Health Plan Inc.
1100 San Leandro Blvd., Suite 200
San Leandro, CA 94577

Dear Mr. Asercion:

Subject: Fuel Leak Cases RO205, 3741 Broadway, Oakland, CA 94611
(Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has recently reviewed the case file for the subject site including the August 3, 2006, Soil Management Plan and the August 11, 2006 Work Plan for Additional Site Characterization 3735-3799 Broadway, Oakland, California both prepared by SECOR International Incorporated (SECOR). The work plan responds to the County's June 13, 2006 letter, which comments on Phase I Site Assessment information and previous soil and groundwater analytical results. Our office has previously commented on Chevron's work plan for remediation and characterization at the adjacent property, 3701 Broadway, Oakland, which is also part of the proposed Kaiser Development. The SECOR Soil Management Plan and work plan addresses the other properties of the planned development. We request that you address the following technical comments and submit the technical report requested below.

TECHNICAL COMMENTS

1. Soil Management Plan- The former UST area will be excavated to a depth of 15' bgs. Two floor samples and confirmation samples from each sidewall at every 5' will be collected for analysis. Please insure that a sidewall sample from the base of the excavation is collected, presumably the third sample @15' depth. The former debris pile and the area at SB-48 will be excavated to approximately 5' in depth and confirmation samples collected from the floor and sidewalls. The SMP is approved. Groundwater, if encountered during the excavation, should be sampled for the same analytes as the soil samples. Determination in the field should be made whether additional groundwater removal would be beneficial as interim remediation.
2. Work Plan for Additional Site Characterization- Three borings are proposed to investigate the former USTs at the site. One of the borings will be located within the former tank pit and the other two down-gradient. Two of the borings will be drilled to 20' bgs and the third (down-gradient) to approximately 35' bgs to determine if an additional water bearing zone exists. If present, two water samples will be collected from this boring. We request that the boring located within the former tank pit be sampled and analyzed every 5' to determine if contaminated soil may have been reused during the original tank removal. The other borings should be screened and if no impact is observed through screening, soil samples may be selected to characterize only the interval between the bottom of the former UST pit and first encountered groundwater.

3. The other proposed borings are meant to characterize areas of prior historical activity (former waste oil tank), potential chemical release (hydraulic lifts), background or evaluate off-site impacts. In addition, if potential areas of concern are observed at 3781 Broadway post-demolition, additional samples will be collected for analysis. We have the following comments/observations to optimize chemical analyses. Boring SB-74, proposed within the former waste oil tank pit can screen soil samples to at least 7' bgs, the depth of the original tank excavation. The waste oil tank pit was reportedly over-excavated to varying depths. The soil and groundwater results found in SB-74 should be used in deciding what samples and what depths should be collected in SB-77. Soil samples taken beneath the hydraulic lifts after removal are preferable to the proposed borings adjacent to the lifts. To determine if PCBs are of concern, we recommend analyzing a sample of hydraulic fluid for PCBs since this would represent the highest anticipated PCB concentration. If PCBs are not present, you may eliminate this analysis in all hydraulic lift samples. Removal of saturated soil beneath the lift and confirmation sampling, in the absence of free product, is normally sufficient. Unless there are reasons to suspect additional contaminants ie location near a sump or waste oil tank, VOCs analysis is not necessary. Because hydraulic oil may be erroneously reported through other analyses ie TPHmo or TPHd, comparison of chromatograms should be used to determine which contaminant is present. The other borings are for information purposes and will indicate whether releases from unknown or up-gradient sources have impacted the property.

TECHNICAL REPORT REQUEST

Please submit the following technical report according to the following schedule:

90 days after completion of soil and groundwater investigation- SWI Report.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Please do not submit reports as attachments to electronic mail.

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Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting). In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

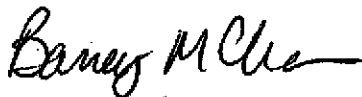
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos

Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549

Mr. Satya Sinha, Chevron, 6001 Bollinger Canyon Rd., Rm. K2256, San Ramon,
CA 94583

Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608

Mr. Sunil Ramdass, SWRCB UST Cleanup Fund, 1001 I St., P.O. Box 944212,
Sacramento, CA 94244

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
06-14-06

COPY FOR
ROZOS - 23

June 13, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

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

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland,
CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the May 24, 2006 Proposed Kaiser Development and the June 12, 2006 Well Destruction Workplan by Cambria and the January 12, 2004 Phase I Environmental Site Assessment Report and the May 26, 2006 response letter report by Secor, all responding to the County's May 1, 2006 letter. It appears that the County concerns have been adequately addressed. We have the following observations and technical report requests.

TECHNICAL COMMENTS

1. 3701 Broadway-

- Vertical Delineation of Hydrocarbons will be addressed by advancing borings in locations where prior results exceeded environmental screening levels. The borings will be advanced to a maximum depth of 30' to determine the vertical extent of contamination. In addition, an area around SB-38, where elevated lead was detected will also be sampled for this analyte.
- Sidewall sampling approximately every 20 linear feet along the excavation, sampled at five-foot intervals will be performed.
- The drainage system proposed will be done to facilitate the excavation and not as a remediation method since the rate and amount of water removed is unknown. After completion of the excavation, please provide an estimate of the amount of hydrocarbons removed from the dewatering in your excavation report.
- A set of the requested design drawings for the development will be provided from Kaiser as soon as available. Kaiser states that a moisture vapor barrier is presumed to be included.
- It appears that there still is a difference in the cleanup levels proposed by Chevron and Kaiser. Site cleanup levels must be consistent with the future use of the property and site closure will be recommended based upon your meeting the appropriate cleanup levels. Your risk assessment should verify this.
- Three borings located within the excavation limits of the former waste oil tank will be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.
- The monitoring well decommissioning work plan for the six on-site wells is approved to accommodate the proposed site excavation. The off-site wells must either be sampled or properly decommissioned. Wells E and F have been paved over and not sampled since 3/03. It is uncertain whether these wells monitor the extent of the

plume since free product on-site and non-detectable concentrations off-site have been reported for years. Please include a proposal for wells E & F and a discussion of the extent of plume delineation in your well decommissioning report.

2. A copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway has been provided by Secor. Based upon this report no additional areas of chemical concern were identified.
3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The areas near SB-12 and SB-32 with elevated TPH and metals contamination will be excavated and re-sampled according to a soil management plan. Please submit the plan prior to excavation.
4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Kaiser will provide a work plan to complete investigation of soil and groundwater impacts associated with the former USTs at this site.
5. 3751-3757 Broadway- The localized TPH mo and TPHd contamination reported in SB-48 will be excavated and re-sampled according to the referenced soil management plan.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- 90 days after excavation of 3701 Broadway- Confirmation soil sampling (Excavation) report, design drawings for development, risk assessment, monitoring well decommissioning report and extent of plume discussion.
- 30 prior to hot spot excavation- Soil Management Plan and work plan for soil and groundwater investigation of 3735-3737 Broadway.

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responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

Messrs. Inglis and Haver
June 13, 2006
Page 3 of 3

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PERJURY STATEMENT

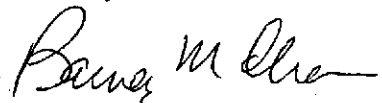
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If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos

Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549
Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608
Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200,
San Leandro, CA 94577

6_12_06 3701_3757 Broadway

ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



SENT
06-14-06

June 13, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

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

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland,
CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the May 24, 2006 Proposed Kaiser Development and the June 12, 2006 Well Destruction Workplan by Cambria and the January 12, 2004 Phase I Environmental Site Assessment Report and the May 26, 2006 response letter report by Secor, all responding to the County's May 1, 2006 letter. It appears that the County concerns have been adequately addressed. We have the following observations and technical report requests:

TECHNICAL COMMENTS

1. 3701 Broadway-

- Vertical Delineation of Hydrocarbons will be addressed by advancing borings in locations where prior results exceeded environmental screening levels. The borings will be advanced to a maximum depth of 30' to determine the vertical extent of contamination. In addition, an area around SB-38, where elevated lead was detected will also be sampled for this analyte.
- Sidewall sampling approximately every 20 linear feet along the excavation, sampled at five-foot intervals will be performed.
- The drainage system proposed will be done to facilitate the excavation and not as a remediation method since the rate and amount of water removed is unknown. After completion of the excavation, please provide an estimate of the amount of hydrocarbons removed from the dewatering in your excavation report.
- A set of the requested design drawings for the development will be provided from Kaiser as soon as available. Kaiser states that a moisture vapor barrier is presumed to be included.
- It appears that there still is a difference in the cleanup levels proposed by Chevron and Kaiser. Site cleanup levels must be consistent with the future use of the property and site closure will be recommended based upon your meeting the appropriate cleanup levels. Your risk assessment should verify this.
- Three borings located within the excavation limits of the former waste oil tank will be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.
- The monitoring well decommissioning work plan for the six on-site wells is approved to accommodate the proposed site excavation. The off-site wells must either be sampled or properly decommissioned. Wells E and F have been paved over and not sampled since 3/03. It is uncertain whether these wells monitor the extent of the

plume since free product on-site and non-detectable concentrations off-site have been reported for years. Please include a proposal for wells E & F and a discussion of the extent of plume delineation in your well decommissioning report.

2. A copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway has been provided by Secor. Based upon this report no additional areas of chemical concern were identified.
3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The areas near SB-12 and SB-32 with elevated TPH and metals contamination will be excavated and re-sampled according to a soil management plan. Please submit the plan prior to excavation.
4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Kaiser will provide a work plan to complete investigation of soil and groundwater impacts associated with the former USTs at this site.
5. 3751-3757 Broadway- The localized TPH mo and TPHd contamination reported in SB-48 will be excavated and re-sampled according to the referenced soil management plan.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- 90 days after excavation of 3701 Broadway- Confirmation soil sampling (Excavation) report, design drawings for development, risk assessment, monitoring well decommissioning report and extent of plume discussion.
- 30 prior to hot spot excavation- Soil Management Plan and work plan for soil and groundwater investigation of 3735-3737 Broadway.

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responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

Messrs. Inglis and Havei
June 13, 2006
Page 3 of 3

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Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos

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Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608
Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200,
San Leandro, CA 94577

6_12_06 3701_3757 Broadway

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05-02-06

May 1, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland,
CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the March 6, 2006 Soil Characterization Report Kaiser Oakland MOB 3701-3757 Broadway Oakland, California prepared by Secor, Cambria's April 13, 2006, Waste Profile for Disposal Workplan and Cambria's April 18, 2006 Soil and Groundwater Management Plan Planned Site Excavation for 3701 Broadway. As you are aware, our office is working with Chevron with their investigation at their former service station at 3701 Broadway as well as overseeing the releases observed on 3735-3737 and 3741 Broadway, properties owned by Kaiser. We previously offered comment to the Secor December 22, 2005 *Additional Characterization Work Plan* in the County's 1/31/06 letter. That work plan followed up the February 10, 2004 Secor *Phase II Environmental Site Assessment Report*. Unfortunately, it appears our comments were not incorporated in the recent investigation. Although the investigation was helpful with Chevron's evaluation of soil impacts at 3701 Broadway, it appears that there are still data gaps to address prior to concurrence for redevelopment or site closure. We recommend Chevron and Kaiser work together to address the following technical comments and submit the technical reports requested below.

TECHNICAL COMMENTS

1. 3701 Broadway- Multiple borings and soil samples on this property were analyzed and reported in Secor's March 6, 2006 report. Although we previously recommended sampling to depths necessary to define the vertical extent of contamination and the sampling of groundwater, this was not done. Chevron's Soil and Groundwater Management Plan (SGMP) proposes to excavate the entire site, to the extent possible, to a maximum depth of ~18' bgs. A drainage system is proposed to direct groundwater to a sump basin that will then be pumped to a holding tank for proper disposal. Please address the following questions/concerns:

- How will the vertical extent of contamination be determined, particularly in the locations where concentrations appear to be increasing with depth and where these concentrations exceed cleanup levels?
 - The inability to collect sidewall confirmation samples poses a problem when attempting to estimate risk to occupants of the proposed subsurface building. There is a potential that the floor confirmation samples will underestimate actual residual concentrations. An attempt to estimate sidewall samples should be done, possibly at some intermediate stage of the excavation. Please provide a supplemental sampling proposal.
 - Please provide a diagram of the proposed drainage system. Please indicate how the source areas were identified and how they will be treated by the drainage system. How and with what frequency will groundwater be sampled? Will the system allow preferential drainage from specific areas? What will determine the duration of the groundwater removal system?
 - Please clarify the specific site development planned for the 3701 Broadway site and the other properties by providing our office a copy of these plans. The SGMP states that a subsurface building at a depth of 15' bgs is proposed. Will a moisture vapor barrier be used?
 - Please provide proposed cleanup levels for soil and groundwater at the site. Those of Chevron appear to differ from those proposed by Secor in behalf of Kaiser.
 - We concur that a risk assessment should be performed and approved prior to site development.
 - The Waste Profile for Disposal Workplan proposes 13 soil borings advanced to approximately 20' bg to characterize the residual concentrations. Shallower samples will characterize soil for disposal purposes. Given the amount of information already known at the site, the locations of these samples should be selected authoritatively not randomly. Please provide a sampling plan and sampling rationale. As mentioned, all efforts should be taken to define contaminants vertically to below cleanup levels. As noted in the SGMP, some soil samples should also be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.
2. Please provide a copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway. This information is necessary to determine the adequacy of the sampling performed at these sites.
 3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The prior Secor investigation identified elevated levels of TPHmo, TPHd and heavy metals in soil samples. Based on the results of the 1/06 investigation the extent of TPH and metals contamination appears limited to near SB-12 and SB-32. Will these areas be excavated prior to development?
 4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Based the limited sampling of the initial Secor investigation, results from boring B6 indicate a significant release to groundwater may have occurred from the former underground tanks. We recommended additional sampling be done to determine the limits of this release to groundwater. Since no sampling was performed in the 1/06 investigation

Messrs. Inglis and Havei

May 1, 2006

Page 3 of 4

it is unclear to what extent the 3701 Broadway site has been impacted by this release. The former USTs on this site must be further investigated. Please provide a work plan to determine the extent of soil and groundwater contamination from this area. In the absence of any tank removal data, we recommend sampling the former tank pit area. It is also noted that elevated petroleum contamination was detected in soil samples on the 3701 Broadway site along the boundary with this site. It is unclear which site(s) are the source(s) of the contamination, however, additional soil and groundwater characterization on the 3735-3737 Broadway property is required to delineate this detected contamination. We require Chevron and Kaiser work together and include this investigation in the requested work plan.

5. 3751-3757 Broadway- This address is indicated as where repair and service occurred. Two additional samples were taken in the 1/06 investigation. It appears that there may be localized TPH mo and TPHd as reported in SB-48. Please determine if this result is consistent with your Phase I results or whether additional sampling is warranted.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- July 3, 2006- Written response to above items, sampling plan for sidewalls, diagram for drainage system, copy of development plans, proposed cleanup levels, post-excavation sampling plan, sampling plan for 3735-3737 Broadway and Phase I reports.
- 90 days after soil and groundwater investigation- Risk Assessment

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responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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PERJURY STATEMENT

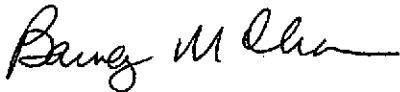
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions (Messrs. Foss & Hoehn)

cc: files, D. Drogos

Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549

Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608

Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200,
San Leandro, CA 94577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05-08-06
COPY FOR
RO205-23

May 1, 2006

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

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

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

Dear Messrs. Inglis and Havel:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland,
CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the March 6, 2006 Soil Characterization Report Kaiser Oakland MOB 3701-3757 Broadway Oakland, California prepared by Secor, Cambria's April 13, 2006, Waste Profile for Disposal Workplan and Cambria's April 18, 2006 Soil and Groundwater Management Plan Planned Site Excavation for 3701 Broadway. As you are aware, our office is working with Chevron with their investigation at their former service station at 3701 Broadway as well as overseeing the releases observed on 3735-3737 and 3741 Broadway, properties owned by Kaiser. We previously offered comment to the Secor December 22, 2005 *Additional Characterization Work Plan* in the County's 1/31/06 letter. That work plan followed up the February 10, 2004 Secor *Phase II Environmental Site Assessment Report*. Unfortunately, it appears our comments were not incorporated in the recent investigation. Although the investigation was helpful with Chevron's evaluation of soil impacts at 3701 Broadway, it appears that there are still data gaps to address prior to concurrence for redevelopment or site closure. We recommend Chevron and Kaiser work together to address the following technical comments and submit the technical reports requested below.

TECHNICAL COMMENTS

1. 3701 Broadway- Multiple borings and soil samples on this property were analyzed and reported in Secor's March 6, 2006 report. Although we previously recommended sampling to depths necessary to define the vertical extent of contamination and the sampling of groundwater, this was not done. Chevron's Soil and Groundwater Management Plan (SGMP) proposes to excavate the entire site, to the extent possible, to a maximum depth of ~18' bgs. A drainage system is proposed to direct groundwater to a sump basin that will then be pumped to a holding tank for proper disposal. Please address the following questions/concerns:

- How will the vertical extent of contamination be determined, particularly in the locations where concentrations appear to be increasing with depth and where these concentrations exceed cleanup levels?
 - The inability to collect sidewall confirmation samples poses a problem when attempting to estimate risk to occupants of the proposed subsurface building. There is a potential that the floor confirmation samples will underestimate actual residual concentrations. An attempt to estimate sidewall samples should be done, possibly at some intermediate stage of the excavation. Please provide a supplemental sampling proposal.
 - Please provide a diagram of the proposed drainage system. Please indicate how the source areas were identified and how they will be treated by the drainage system. How and with what frequency will groundwater be sampled? Will the system allow preferential drainage from specific areas? What will determine the duration of the groundwater removal system?
 - Please clarify the specific site development planned for the 3701 Broadway site and the other properties by providing our office a copy of these plans. The SGMP states that a subsurface building at a depth of 15' bgs is proposed. Will a moisture vapor barrier be used?
 - Please provide proposed cleanup levels for soil and groundwater at the site. Those of Chevron appear to differ from those proposed by Secor in behalf of Kaiser.
 - We concur that a risk assessment should be performed and approved prior to site development.
 - The Waste Profile for Disposal Workplan proposes 13 soil borings advanced to approximately 20' bg to characterize the residual concentrations. Shallower samples will characterize soil for disposal purposes. Given the amount of information already known at the site, the locations of these samples should be selected authoritatively not randomly. Please provide a sampling plan and sampling rationale. As mentioned, all efforts should be taken to define contaminants vertically to below cleanup levels. As noted in the SGMP, some soil samples should also be analyzed for TPHd and TPHmo in addition to TPHg, BTEX and lead.
2. Please provide a copy of the Phase I investigation for the other properties of this site ie 3741, 3735-3737 and 3751-3757 Broadway. This information is necessary to determine the adequacy of the sampling performed at these sites.
 3. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The prior Secor investigation identified elevated levels of TPHmo, TPHd and heavy metals in soil samples. Based on the results of the 1/06 investigation the extent of TPH and metals contamination appears limited to near SB-12 and SB-32. Will these areas be excavated prior to development?
 4. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Based the limited sampling of the initial Secor investigation, results from boring B6 indicate a significant release to groundwater may have occurred from the former underground tanks. We recommended additional sampling be done to determine the limits of this release to groundwater. Since no sampling was performed in the 1/06 investigation

it is unclear to what extent the 3701 Broadway site has been impacted by this release. The former USTs on this site must be further investigated. Please provide a work plan to determine the extent of soil and groundwater contamination from this area. In the absence of any tank removal data, we recommend sampling the former tank pit area. It is also noted that elevated petroleum contamination was detected in soil samples on the 3701 Broadway site along the boundary with this site. It is unclear which site(s) are the source(s) of the contamination, however, additional soil and groundwater characterization on the 3735-3737 Broadway property is required to delineate this detected contamination. We require Chevron and Kaiser work together and include this investigation in the requested work plan.

5. 3751-3757 Broadway- This address is indicated as where repair and service occurred. Two additional samples were taken in the 1/06 investigation. It appears that there may be localized TPH mo and TPHd as reported in SB-48. Please determine if this result is consistent with your Phase I results or whether additional sampling is warranted.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- July 3, 2006- Written response to above items, sampling plan for sidewalls, diagram for drainage system, copy of development plans, proposed cleanup levels, post-excavation sampling plan, sampling plan for 3735-3737 Broadway and Phase I reports.
- 90 days after soil and groundwater investigation- Risk Assessment

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years,

responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

Messrs. Inglis and Havei
May 1, 2006
Page 4 of 4

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions (Messrs. Foss & Hoehn)

cc: files, D. Drogos

Mr. Greg Hoehn, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549
Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608
Mr. Jay Asercion, Kaiser Permanente, 1100 San Leandro Blvd., Suite 200,
San Leandro, CA 94577

4_27_06 3701_3757 Broadway

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-02-06

January 31, 2006

Mr. Tim Havel
Director, Western Environmental, Health and Safety Service Hub
Kaiser Permanente
100 S. Los Robles, Ste. 410
Pasadena, CA 91188

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

Mr. Mark Inglis
Chevron
6001 Bollinger Canyon Rd., Rm K2256
San Ramon, CA 94583-2324

Dear Messrs. Havel and Inglis:

Subject: Fuel Leak Cases RO500 and RO205, 3701 and 3741 Broadway, Oakland,
CA 94611 (Proposed Kaiser Development)

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the properties, 3701 Broadway (RO0000500) and 3741 Broadway (RO0000205), the two County sites within the proposed Kaiser development and the Secor December 22, 2005 *Additional Characterization Work Plan*. This work plan follows up the February 10, 2004 *Secor Phase II Environmental Site Assessment Report*. As you are aware, our office is working with Chevron with their investigation at their former service station at 3701 Broadway as well as overseeing the releases observer on 3735-3737 and 3741 Broadway. Ideally, the information proposed in the *Secor Additional Characterization Work Plan* will identify those areas, which may need further assessment/remediation and this work can be done expeditiously to facilitate Kaiser's site redevelopment plans. Thank you for the opportunity to review the proposed work plan. Our office is responsible for the oversight of environmental releases and their impact to human health and the environment. It is within this context that we offer the following technical comments to the Secor work plan. Please consider the following comments when performing the proposed work and submit the technical reports requested below.

TECHNICAL COMMENTS

1. 3701 Broadway- Multiple borings are proposed at this site to a maximum depth of 20 feet. We recommend that borings be advanced to depths necessary to determine the vertical extent of contamination and that samples be analyzed from areas of apparent impact indicated by screening instruments, with a minimum of two samples being tested. Because of the absence of wells in strategic locations, it would be advantageous to collect grab groundwater samples from some of the proposed samples to better characterize the petroleum release, both the dissolved and free product. I recommend you contact Chevron to jointly determine the borings where groundwater should be collected. Your investigation report should include figures indicating the current estimated TPH iso-concentration contours and free product area(s). Although the proposed work is limited to on-site, off-site investigation may

be required to delineate the dissolved or free product release. Once the data from your report is obtained, it would be appropriate for Chevron to provide a remedial action plan for these releases and for plume delineation, as necessary.

2. 3741 Broadway- This address is the area identified on the Val Strough Honda lot where the main sales office, storage room with a door covering the floor and a floor drain were located. The prior Secor investigation identified elevated levels of TPHmo, TPHd and heavy metals in soil samples. Six borings are proposed for sampling in this area, at depths of 2 and 6', to determine the limits of this contamination. Again, we recommend the vertical extent of these contaminants be determined to whatever depths necessary. Based on your results, please determine the potential impact to groundwater from this release and consider taking a grab groundwater sample from this area.
3. 3735-3737 Broadway- This address is the area where the former Rainbow Car Wash, sump and three underground storage tanks had been located. Based the limited sampling of the initial Secor investigation (B6), it appears that a significant release to groundwater has occurred from the former underground tanks. We recommend additional sampling be done to determine the limits of this release to groundwater. Minimally, borings up and down-gradient of SB-6 should be proposed for groundwater sampling and possibly within the former tank pit given the limited data obtained from the original tank removal.

TECHNICAL REPORT REQUEST

Please submit the technical information according to the following schedule:

- March 1, 2006- Figure indicating groundwater sampling locations at 3701 Broadway and proposed boring locations to investigate release near boring SB-6.
- 90 days after soil and groundwater investigation- Soil and groundwater report
- 90 days after soil and groundwater investigation- Remedial Action Plan from Chevron

ELECTRONIC SUBMITTAL OF REPORTS

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Messrs. Havel and Ingers

January 31, 2006

Page 3 of 3

responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

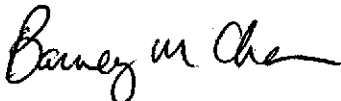
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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. B. Scarbrough, Secor, 57 Lafayette Circle, 2nd Floor, Lafayette, CA 94549

Mr. Bob Foss, Cambria, 5900 Hollis Street, Suite A, Emeryville, CA 94608

1_31_06 3701 Broadway

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Sent 1/26/00
Including cc's

20205

January 25, 2000

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

Val Strough Honda
Attn: Mr. Brady McQueen
3741 Broadway
Oakland, California 94611

Ms. Bernice Campbell
224 Mountain Avenue
Piedmont, California 94611

Ms. Maude Besthorn
1501 Ptarmigan Drive
Walnut Creek, California 94595

RE: Val Strough Honda (STID # 1235)
3735-3741 Broadway, Oakland, California 94611

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. McQueen, Ms. Campbell and Ms. Besthorn:

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: 3735 - 3741 Broadway, Oakland, CA

January 25, 2000

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) 567-6780 should you have any questions about the content of this letter.

Sincerely,



Susan L. Hugo
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
Bruce Bercovich, Kay & Merkle, 100 The Embarcadero, 3rd Fl. San Francisco, CA 94105
Herb Henderson, 2047 El Cajon Boulevard, San Diego, CA 92104
Glen Carter, 2020 Gill Port Lane, Walnut Creek, CA 94598
SH / files

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

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



R0205 (Kaiser Dex/Val Strough
Honda @ 3735-3799
Broadway)

R0500 (Chevron #9-1026 e
3701 Broadway)

Certified Mailer # P 062 127 769

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

March 13, 1991

Val Strough Honda/Val Strough Chevrolet
c/o Mr. W. Bruce Bercovich
Kay & Merkle
100 The Embarcadero, 3rd Floor
San Francisco, CA 94105

RE: Potential contamination from former underground fuel storage
tanks at 3737 Broadway, Oakland

Gentleman:

Thank you for submitting complete analytical results from the February 1987 tank removal from 3737 Broadway, for the file. These results indicate that at the locations where samples were taken following the tanks' removal, low levels of contamination were found. Despite this data, however, as indicated in this office's January 18, 1991 letter to you, samples of groundwater from the northern edge of the adjacent 3701 Broadway property indicate the possibility that hydrocarbons have migrated from 3737 Broadway onto 3701 Broadway. This is because the monitoring wells at 3701 Broadway that are hydraulically upgradient of the tanks removed from that property, but downgradient of the former tank area on 3737 Broadway, show significant groundwater contamination. Therefore, the responsible party must investigate the source of this contamination by initiating a subsurface assessment, as discussed in previous letters. In summary, for a variety of reasons, soil samples collected during tank removal may miss contamination that subsequent evidence or data shows to in fact be present.

As stated in our January 18, 1991 letter, under Sec. 13304(a) of the Porter-Cologne Water Quality Control Act (California Water Code), a responsible party is defined as any person who "has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into waters of the state and creates, or threatens to create, a condition of pollution or nuisance..." This section goes on to state that this person must "clean up such waste or abate the effects thereof..." Thus, an underground tank system that in the past resulted in unauthorized releases confers liability on the following parties:

- 1) The property owner at the time of the release(s) and thereafter for as long as the releases threaten groundwater;

Val Strough Honda/Val Strough Chevrolet

March 13, 1991

Page 2 of 2

- 2) The property lessor (as distinguished from facility operator) at the time of release and thereafter for as long as the releases threaten groundwater; and
- 3) The facility operator (or sublessor) at the time of release.

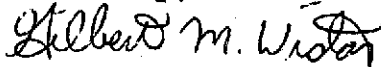
Therefore, we are still requiring that a work plan be submitted to this office, which is designed to determine whether the old underground tanks at 3737 Broadway are contributing to the hydrocarbon plume beneath the former Chevron station, and if so, to what extent. This work plan is to be submitted to this office for approval, and is due immediately upon receipt of this letter.

A suitably qualified environmental consultant must handle this investigative work. We are currently requiring Chevron to define the limits of and remediate contaminated groundwater underneath 3701 Broadway, and county oversight on this issue will continue until full cleanup occurs. However, you will be responsible for subsurface contamination (if any) originating from 3737 Broadway. In addition, we require the responsible party to submit a \$425 deposit, made out to Alameda County, to cover our costs for report review and remedial oversight of the case. This deposit is also due immediately.

This letter constitutes a formal request for technical reports according to Sec. 13267 of the California Water Code, as well as Sec. 25299.36 of the Health and Safety Code. Copies of all documentation sent here should also be sent to the Regional Water Quality Control Board in Oakland (attn: Lester Feldman). Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law, such as Sec. 25299.37 of the Health and Safety Code, may also be cited.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar

Hazardous Materials Specialist

cc: Glenn Carter (2020 Gill Port Ln., Walnut Creek, CA 94598)
Herb Henderson (600 B St., San Diego, CA 92183)
Nancy Vukelich, Chevron USA (P.O. Box 5004, San Ramon, CA 94583)
Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0205

September 19, 1990

Steve Lockhart
Val Strough Hyundai
3741 Broadway
Oakland, CA 94611

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

Re: Waste Minimization Assessment

Dear Steve Lockhart:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Edgar B. Howell".

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0205

June 11, 1990

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

Mr. Brady W. McQueen, General Manager
Val Strough Honda
3741 Broadway
Oakland, CA 94611

RE: Former underground tanks at 3737/3741 Broadway, adjacent to the current Honda Parts Dept.

Dear Mr. McQueen:

As you may be aware, a Chevron gas station formerly occupied the property at 3701 Broadway, at the corner of Broadway and MacArthur. Samples of groundwater from the northern edge of this property indicate the possibility that hydrocarbons have migrated from the Val Strough parcel at 3737/3741 Broadway onto the 3701 Broadway site.

As a first step in investigating this situation, this office conducted a file search and site visit on the properties in question. Information in the file suggests that R.J. Miller Co. sampled soil from the tank pit area at 3737 Broadway in February 1987. There is a reference to three tanks at this location, with soil sample results showing relatively low levels of hydrocarbons in the soil. However, the Miller report only contains analytical results from two of the three tanks; in addition, the manner in which samples were actually collected and analyzed is not documented. The site visit confirmed that there were three tanks at this location; a large asphalt patch sits over the former tank pit, and three vent pipes are still in place along the Parts Dept. building.

As the owner/operator of this property, you are required by state law to take diligent actions to protect groundwater and to investigate any contamination apparently originating from the site. Again, because the monitoring wells at 3701 Broadway that are upgradient of the tanks removed from that property, but downgradient of the tank area on 3737/3741 Broadway show significant groundwater contamination, we suspect that this contamination migrated from 3737/3741 Broadway.

Therefore, we are requiring you to submit to this office the following information, by July 18, 1990.

- Any and all documentation regarding the removal of the three tanks in early 1987, including work done to clean up any contaminated soil or groundwater.
- Taking the above documentation into account, as well as the apparent "upstream" contamination on the 3701 Broadway property,

Mr. Brady McQueen
June 11, 1990
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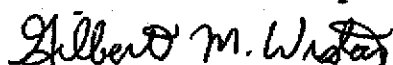
a work plan designed to determine whether 3737/3741 Broadway has contributed to the hydrocarbon plume beneath the old Chevron station, and if so, to what extent.

We recommend that you hire an environmental consultant to handle this investigative work. We are currently requiring Chevron to define the limits of and remediate contaminated groundwater underneath 3701 Broadway, and county oversight on this issue will continue until full cleanup occurs. However, Val Strough will be responsible for contamination (if any) originating from its former tank site. Please submit a deposit of \$375, made out to Alameda County, to cover our costs for report review and remedial oversight of your case.

This letter constitutes a formal request for technical reports (according to Sec. 13267 of the California Water Code, as well as Sec. 25299.36 of the California Health and Safety Code). Copies of all documentation sent here should also be sent to the Regional Water Quality Control Board in Oakland (attn: Lester Feldman).

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

cc: Lisa Marinaro, Chevron USA (P.O. Box 5004, San Ramon, CA 94583)
Lester Feldman, RWQCB
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files