ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

July 25, 2007

Mr. Chuck Miller
USA Petroleum Corporation
30101 Agoura Court #200
Agoura Hills, CA 91301

Mr. Hugh K. Phares & Mr. John Jay
Jay-Phares Corporation
10700 MacArthur Blvd.
Oakland, CA 94605

Dear Messrs. Miller, Phares and Jay:

Subject: Fuel Leak Case RO0000232, USA Petroleum, 10700 MacArthur Blvd., Oakland, CA 94605

Alameda County Environmental Health has received and reviewed the June 13, 2007 Work Plan for Dual Phase Extraction and Air Sparge Hydrocarbon Mass Removal Event, Former USA Service Station No. 57, prepared by Stratus Environmental. The work plan proposes the installation of two additional air sparge wells, AS-1 and AS-2, to augment the existing dual phase extraction system and the oxygen sparging system at the site. Wells EX-1 through EX-4 will be used for extraction while wells S-1, S-2, MW-3,6,7 and 8 will be used as observation wells. We concur with your proposal and your rationale for the combined use of dual phase extraction and air sparging given the removal results of your past dual phase extraction events. It is believed that this approach will hasten the time necessary to achieve water quality objectives and site closure. We have the following technical comment and request you submit the technical reports requested below.

TECHNICAL COMMENTS

1. We have been notified by Stratus that MW-6 is obstructed at a depth of approximately 17.5'. Stratus recommends over-drilling this well and replacing it. Based on existing monitoring data, we do not require further monitoring of this well and it may be properly decommissioned when convenient.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according the schedule below.

- November 25, 2007- Report for Installation of Air Sparge Wells and DPE and AS Event Report

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board,(http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting), for more information t on these requirements.

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

4580

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

RO232

94502@6540
9130184372 0006

Mr. Chuck Miller
USA Petroleum Corporation
30101 Agoura Court, #200

NIXIE 913 DE 1 00 07/29/07
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
BC: 94502654031 *0305-07866-26-41

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: files, D. Drogos
Mr. Scott Bittinger, Stratus Environmental, Inc., 3330 Cameron Park Dr., Ste. 550, Cameron Park, CA 95682
Mr. P. McIntyre, AEI, 2500 Camino Diablo, Suite 100, Walnut Creek, CA 94597
7_25_07 10700 MacArthur

Chan, Barney, Env. Health

RO 232

From: Scott Bittinger [sbittinger@stratusinc.net]
Sent: Tuesday, July 24, 2007 10:44 AM
To: Chan, Barney, Env. Health
Cc: gkowtha@stratusinc.net; snandi@stratusinc.net
Subject: well replacement, former USA Station 57, 10700 MacArthur Blvd.

Barney:

As we discussed, well MW-6 at this site has been obstructed for some time. The well was missing between October 2000 and January 2004. After relocating the well, it was noted that the well was obstructed at approximately 17.5 feet bgs. Since January 2004, this well has been sampled several times, as depth to groundwater was located above the obstruction.
Recently, groundwater levels have decreased, to a level near the bottom of the well, and the well cannot currently be sampled.

In June, we submitted a work plan proposing the installation of 2 air sparge wells to be used in conjunction with a proposed DPE event at the site.
Assuming these well installations are approved, we would like to overdrill and replace monitoring well MW-6 during the same drilling mobilization as the air sparge well installation.

Monitoring well MW-6 was originally constructed (November 1995) using 30 feet of well screen, situated from approximately 10 to 40 feet bgs. Between 1995 and the present, depth to groundwater in this well ranged from approximately 11 to 22 feet bgs. I propose to construct a replacement well in the same borehole, with a screening interval of 8 to 28 feet bgs.

Please let me know if you have any questions.

Thanks,

Scott

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

7

September 9, 2005

Mr. Chuck Miller
USA Petroleum Corporation
30101 Agoura Court #200
Agoura Hills, CA 91301

Mr. Hugh K. Phares & Mr. John Jay
Jay-Phares Corporation
10700 MacArthur Blvd.
Oakland, CA 94605

Dear Messrs. Miller, Phares and Jay:

Subject: Fuel Leak Case [redacted] USA Petroleum, 10700 MacArthur Blvd., Oakland, CA 94605

Alameda County Environmental Health has received and reviewed the *August 31, 2005 Work Plan for Well Installation and In-Situ Groundwater Remediation* prepared by Stratus Environmental, Inc. The work plan proposes the installation of four additional extraction wells and the placement of the oxygen enrichment system, ISOC™, into the existing wells, S-1, S-2 and MW-3. We concur with your proposal and your rationale for the combined use of dual phase extraction and oxygen enrichment, given the recalcitrant nature of residual contaminants in groundwater at the site and the lack of effectiveness of the current remedial approach. It is believed that this approach will hasten the time necessary to achieve water quality objectives and site closure. Please address the following technical comments and submit the technical reports requested below.

TECHNICAL COMMENTS

1. Please provide your projected schedule for dual phase extraction from the newly installed wells and your strategy for modifying this schedule.
2. Please incorporate the sampling and monitoring of the extraction wells into your current monitoring program after completion of their installation. You should also include the results of the non-petroleum constituent analysis (indicators of bio-remediation) and an interpretation of these results in your monitoring reports.
3. Please note that Alameda County Public Works not ACHCSA is responsible for approving well permits for this site. They can be contacted at 510-670-6633, attn: Mr. James Yoo.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according the schedule below.

- October 12, 2005- Dual phase extraction schedule and strategy
- 60 days after installation of wells- technical report

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the

need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) 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.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions (G. Kowtha)

C: files, D. Drogos
Mr. G. Kowtha, Stratus Environmental, Inc., 3330 Cameron Park Dr., Ste. 550, Cameron Park, CA 95682
Mr. P. McIntyre, AEI, 2500 Camino Diablo, Suite 100, Walnut Creek, CA 94597

9_9_05 10700 MacArthur

10232

COPY

STRATUS ENVIRONMENTAL, INC.

3330 Cameron Park Drive, Ste 550
Cameron Park, California 95682
(530) 676-6004 ~ Fax: (530) 676-6005

May 16, 2004
Project No.: 2007-0057-01

Ms. Mirtha Ninayahuar
East Bay Municipal Utility District
Environmental Services Division, MS 702
P. O. Box 24055
Oakland, CA 94623-1055

Re: Application to Discharge Extracted Groundwater to the Sanitary Sewer, Former USA Service Station No. 57, 10700 MacArthur Boulevard, Oakland, California

Dear Ms. Ninayahuar:

Stratus Environmental Inc. (Stratus) has prepared this letter, on behalf of USA Gasoline Corporation (USA), to request a permit to discharge treated groundwater to the sanitary sewer at Former USA Facility No. 57, located at 10700 MacArthur Boulevard, Oakland, California (see Figure 1). A completed permit application is included in Appendix A. The proposed soil and groundwater remediation activities to reduce the subsurface petroleum hydrocarbon mass are anticipated to be conducted for approximately 30 days per quarter, for one year, between June 2005 and June 2006. The first 30-day petroleum hydrocarbon mass removal event is scheduled to commence on June 6, 2005.

During May 2004, Stratus prepared and submitted an application (dated May 11, 2004) to East Bay Municipal Utility District (EBMUD) requesting a special discharge permit to complete a 20-day dual phase extraction (DPE) feasibility test/mass removal event to evaluate the technical feasibility of using DPE as a remedial measure to reduce the subsurface petroleum hydrocarbon mass. EBMUD subsequently issued a permit (dated June 8, 2004) authorizing discharge of treated groundwater to the sanitary sewer on site.

Based on the results of the feasibility test and analytical data for the quarterly groundwater samples collected from monitoring wells, Stratus prepared and submitted a *Dual Phase Extraction Test Report* (dated October 15, 2004) to Alameda County Health Care Services (ACHCS) proposing to conduct additional 30-day DPE events to further reduce the subsurface petroleum hydrocarbon mass before the subject site (vacant lot) is redeveloped for commercial purposes. ACHCS approved this scope of work in a letter dated May 9, 2005.

Stratus proposes to conduct the first 30-day DPE event beginning June 6, 2005 using a CBA 400 cubic feet per minute DPE system. Petroleum hydrocarbon laden soil vapors

and groundwater will be extracted from wells S-1, S-2, and MW-3 (see Figure 2), using the 25 horsepower liquid ring pump of the DPE system. The combined stream of soil vapors and groundwater will be separated in the 100-gallon knockout tank, in-built on the trailer mounted DPE system. Groundwater from the knockout tank will then be treated using two 500 pounds (lbs) granular activated carbon (GAC) vessels in series containing virgin coconut shell carbon, and the treated groundwater will then be discharged to the sanitary sewer clean out (Side Sewer 1, Figure 3). The soil vapors will be abated in the thermal oxidizer of the DPE system prior to the discharge to the atmosphere.

During the 20-day DPE test completed during July 2004, approximately 35,600 gallons of groundwater was extracted, at an average rate of approximately 1,780 gallons per day, and treated using two 500 lbs GAC vessels in series prior to discharge to the sanitary sewer. Three influent and effluent water samples were collected during this test. The total petroleum hydrocarbons as gasoline (TPHG), benzene, and methyl tertiary butyl ether (MTBE) concentrations in the influent samples were reported at concentrations in the ranges of less than 50 micrograms per liter (µg/L) to 2,200 µg/L, less than 0.50 µg/L to 13 µg/L, and 3.7 µg/L to 66 µg/L, respectively. Petroleum hydrocarbons or fuel oxygenates were not reported in any of the effluent water samples. Tabulated analytical results of the influent and effluent water samples collected during the 20-day DPE event are presented in Appendix B.

Stratus anticipates similar groundwater extraction rates and concentrations during the proposed 30-day event. However, considering uncertainties involved with hydrogeological conditions, Stratus requests a maximum discharge allowance of approximately 2,500 gallons per day. Stratus proposes to collect a minimum of two influent and effluent water samples during each 30-day DPE event. The samples will be forwarded to a state-certified laboratory for chemical analysis. The samples will be analyzed for TPHG using U.S. Environmental Protection Agency (USEPA) Method 8015/8020 Modified, and for benzene, toluene, ethylbenzene, and xylene isomers (BTEX), MTBE, ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary butyl alcohol (TBA), and ethanol by USEPA Method 8260B.

Subsequent to the completion of each DPE event, and within 45-days of receipt of all analytical results, Stratus will prepare and submit to EBMUD a waste discharge summary report that will include the total quantities of groundwater extracted, treated, and discharged to sanitary sewer, a tabulated summary of analytical results, and petroleum hydrocarbon mass removal estimates.

If you have any questions or comments, please call Kiran Nagaraju at (530) 676-6007.

Sincerely,

STRATUS ENVIRONMENTAL INC.,

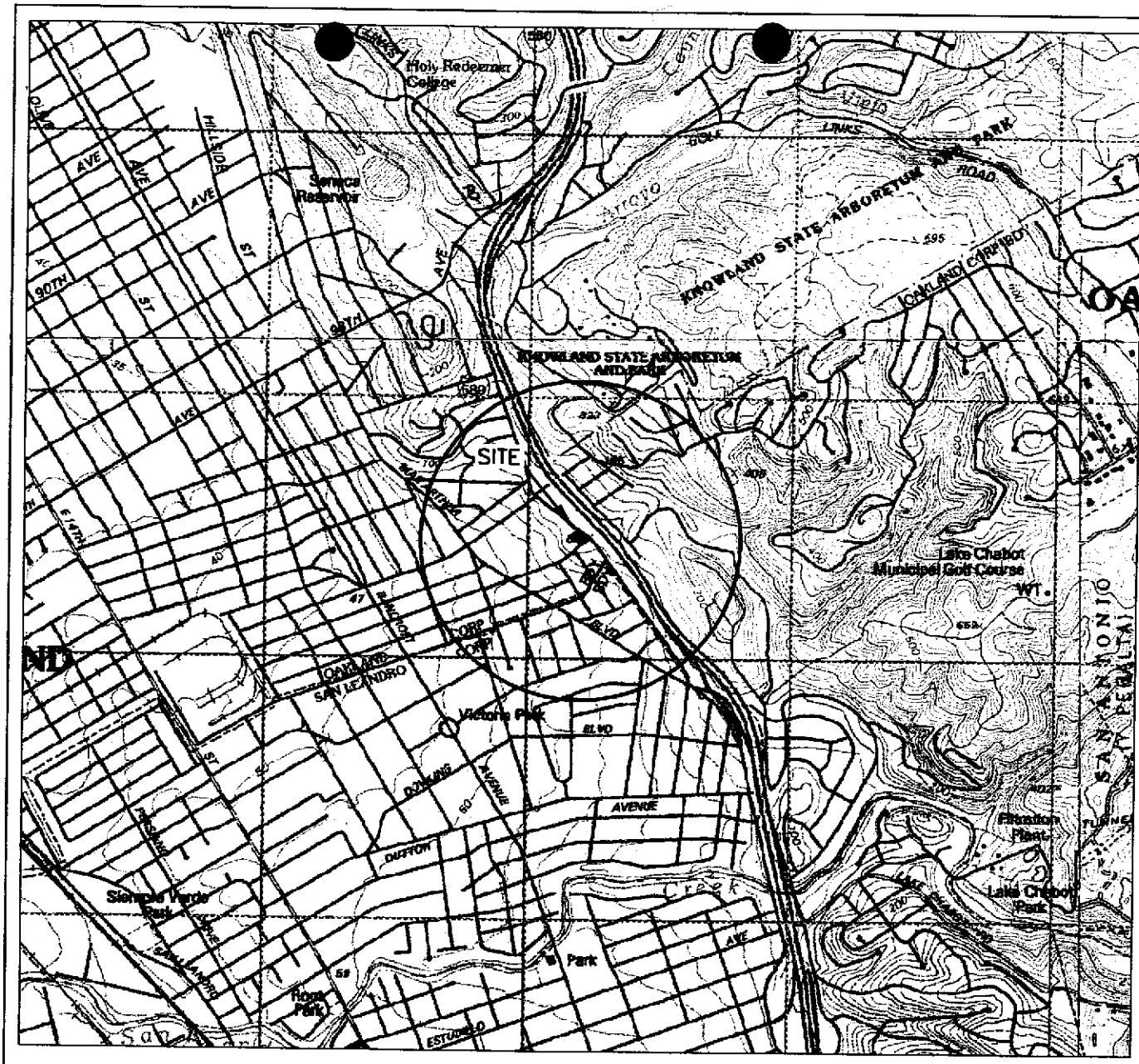
Kiran Nagaraju
Staff Engineer

Gowri S. Kowtha, P.E.
Project Manager

Attachments:

	Figure 1	Site Location Map
	Figure 2	Site Plan
	Figure 3	Process Flow Diagram
	Appendix A	Permit Application
	Appendix B	Analytical Summary Table

cc: Mr. Charles Miller, USA Gasoline Corporation
Mr. Amir Gholami, Alameda County Health Care Services
Mr. Ken Phares, Jay-Phares Corporation
Mr. Peter McIntyre, AEI Consultants



GENERAL NOTES:
BASE MAP FROM U.S.G.S.
OAKLAND, CA
7.5 MINUTE TOPOGRAPHIC
PHOTOREVISED 1980

QUADRANGLE LOCATION

North

0 2000 FT

SCALE 1:24,000

STRATUS ENVIRONMENTAL, INC.

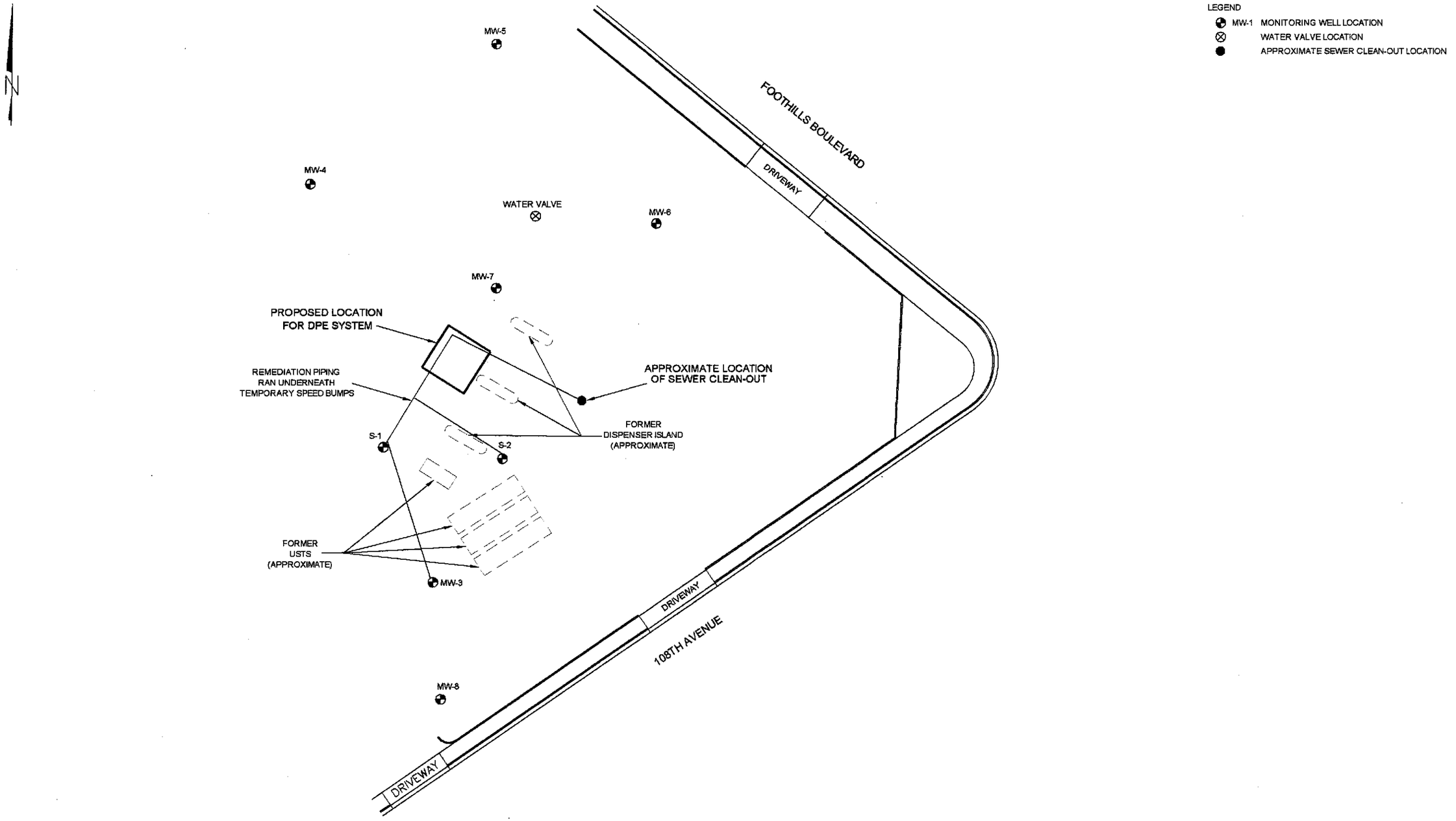
FORMER USA SERVICE STATION NO. 57
10700 MACARTHUR BOULEVARD
OAKLAND, CALIFORNIA

SITE LOCATION MAP

FIGURE
1

PROJECT NO.
2007-0057-01

USA57\Quarterly JMP May 11, 2006 USA 57Site Location Map.dwg



USA57Source JMP REV May 16, 2005 USA 57 Site Plan.dwg

STRATUS
ENVIRONMENTAL, INC.

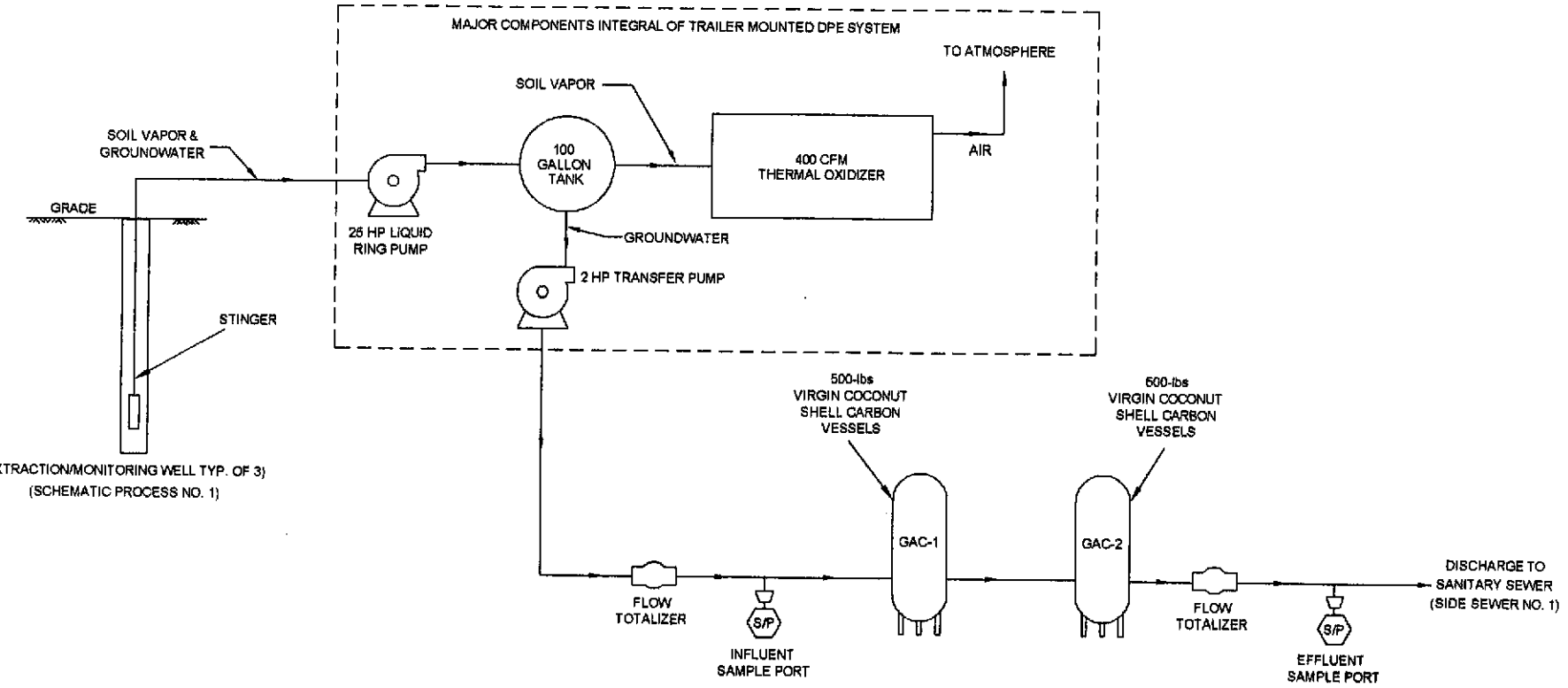
0 40 FT
HORZ. SCALE

FORMER USA STATION NO. 57
10500 MACARTHUR BOULEVARD
OAKLAND, CALIFORNIA

SITE PLAN

FIGURE
2

PROJECT NO.
2007-0057-01



GROUNDWATER EXTRACTION & TREATMENT SYSTEM

NOT TO SCALE

THIS IS A PROCESS FLOW DIAGRAM, THEREFORE INSTRUMENTATION AND CONTROL EQUIPMENT DETAILS ARE NOT SHOWN. INSTRUMENT FUNCTIONS AND INTERACTIONS ARE ALSO NOT SHOWN. EQUIPMENT SIZES ARE NOT PROPORTIONAL AND ARE NOT INDICATIVE OF FINAL SIZES.

STRATUS ENVIRONMENTAL, INC.		FORMER USA STATION NO. 57 10700 MACARHTUR BOULEVARD OAKLAND, CALIFORNIA PROCESS FLOW DIAGRAM	FIGURE 3 PROJECT NO. 2007-0057-01

APPENDIX A

PERMIT APPLICATION

EBMUD

WASTEWATER DISCHARGE PERMIT
Terms and Conditions
APPLICANT INFORMATION

APPLICANT BUSINESS NAME	PERMIT NUMBER
USA GASOLINE CORPORATION	

ADDRESS OF SITE DISCHARGING WASTEWATER

STREET ADDRESS	CITY	ZIP CODE
10700 MACARTHUR BOULEVARD	OAKLAND	

PERSON TO BE CONTACTED REGARDING THIS APPLICATION

NAME	ELECTRONIC MAIL ADDRESS	TELEPHONE NUMBER	FACSIMILE NUMBER
KIRAN NAGARAJU	KNAGARAJU@STRATUSINC.NET	(530) 676 6007	(530) 676 6005

PERSON(S) TO RECEIVE PERMIT AND CORRESPONDENCE IF DIFFERENT THAN PERSON SIGNING APPLICATION

NAME	MAILING ADDRESS

PERSON TO BE CONTACTED IN THE EVENT OF AN EMERGENCY

NAME	DAYTIME TELEPHONE NUMBER	NIGHTTIME TELEPHONE NUMBER
GOWRI S. KOWTHA	(530) 676 6001	(916) 804-3614

AUTHORIZATION

GOWRI S. KOWTHA, VICE-PRESIDENT *is authorized to sign reports, documents, and other correspondence required by this Permit.*

NAME & TITLE

CERTIFICATION

I understand that I am legally responsible for discharge of wastewater from the facility and for complying with the Terms and Conditions of this Wastewater Discharge Permit.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME	TITLE
GOWRI S. KOWTHA, P.E.	VICE-PRESIDENT

SIGNATURE

DATE 5/16/05

(TO BE SIGNED BY CHIEF EXECUTIVE OFFICER OR DULY AUTHORIZED REPRESENTATIVE. SEE CERTIFICATION REQUIREMENTS ON REVERSE)

MAILING ADDRESS	PHONE NUMBER
3330 CAMERON PARK DR. #550, CAMERON PARK CA 95682	(530) 676 6001

WASTEWATER DISCHARGE PERMIT
Terms and Conditions
PROCESS DESCRIPTION

APPLICANT BUSINESS NAME USA GASOLINE CORPORATION

The information on this form provides a description of wastewater generating processes, characteristics of the wastewater, and waste management activities. Instructions are on the back of this form.		Permit Number
BUSINESS ACTIVITY GROUNDWATER REMEDIATION SYSTEM	Standard Industrial Classification	Business Classification Code

PROCESSES

Process Description	Wastewater Characteristics	Schematic Process Number
EXTRACTION / MONITORING WELL	PETROLEUM HYDROCARBONS & FUEL OXYGENATES (TPHG, BTEX, MTBE, TBA, DIPE, TAME & ETBE)	1

POLLUTION PREVENTION TECHNIQUES / BEST MANAGEMENT PRACTICES (BMPs)

NA

PRETREATMENT

Pretreatment System	Design Capacity	Loading Rate	Size	Side Sewer Number
☐ filtration				
☐ grease trap/oil and water separator				
☒ granular activated carbon	20 gpm	5-7 gpm	TWO - 500 lbs	1
☐ sedimentation				
☐ pH adjustment				
☐ chlorination				
☐ chemical precipitation				
☐ other (describe)				
☐ none				

PROCESS GENERATED WASTE

Waste / Disposal Method	Annual Waste Generation Quantity	Unit

NA

APPLICANT BUSINESS NAME USA Gasoline Corporation

WASTEWATER DISCHARGE PERMIT
Terms and Conditions

WATER BALANCE/STRENGTH SUMMARY

The information on this form describes the volume, source, and strength of wastewater discharged to the community sewer. Instructions are on the back of this form.	Permit Number

WATER USE AND WASTEWATER DISCHARGE BALANCE

Units expressed in: gallons per calendar day or ☒ gallons per working day (Number of working days per year 120)

Water Use	Source			Wastewater Discharge to each Side Sewer					Water Diverted	Code[2]
	EBMUD	Other	Code[1]	No. 1	No.	No.	No.	No.		
Sanitary										
Processes										
Product										
Boiler										
Cooling										
Washing										
Irrigation										
REMEDIATION		2,500	A	2,500						
Sub-total		2,500								
Total	All Sources	2,500		All Side Sewers 2,500			All Side Sewers + Water Diverted			
Maximum Daily Discharge (gallons)				2,500						

METERED WATER

Water Meter Number	Code[3]	Percent Discharge to each Side Sewer					Total % Discharge
	P	100					100

[1]Other / Code: Compute the average gallon per day water use from non-EBMUD sources and enter the value in the Other "Sub-total" box. Do not include sources that discharge only to the stormdrain. Allocate the subtotal value to each type of water use. Enter the code(s) that identifies the source water:

A= Well Water / Groundwater *B= Stormwater* *C= Reclaimed Water* *D= Other (describe)*

[2]Water Diverted/Code: Enter the diverted volume for each type of water use. Enter the code(s) that identifies the diversion:

A= Product *B= Evaporation* *C= Irrigation* *D= Creek/Bay* *E= Rail, Truck, Vessel* *F= Other (describe)*

[3]Metered Water Code(s): E= EBMUD Meter P= Private Meter

APPLICANT BUSINESS NAME USA GASOLINE CORPORATION

WASTEWATER DISCHARGE PERMIT
Terms and Conditions

WATER BALANCE/STRENGTH SUMMARY

WASTEWATER STRENGTH ESTIMATES		Wastewater Discharge to each Side Sewer				
		No. 1	No.	No.	No.	No.
Total Suspended Solids mg/L (TSS)	Average					
	Maximum					
Filtered Chemical Oxygen Demand mg/L (CODF)	Average					
	Maximum					

DISCHARGE FREQUENCY

Days of Week	7 { Discharge will occur 7 days/week for one month per quarter per year }				
Time of Day (Start & Stop Time)	00:00 hrs to 23:59 hrs				
Volume, if Batch Discharge					

SIDE SEWER LOCATION

No. 1. See Figure 2

No.

No.

No.

No.

STORMWATER AREA

Total square-foot area exposed to stormwater that drains to the sanitary sewer: _____ sq. ft.

APPENDIX B

ANALYTICAL SUMMARY TABLE

TABLE 6
GROUNDWATER ANALYTICAL RESULTS
Former USA Station No. 57
10700 MacArthur Boulevard
Oakland, California

Sample Date	Sample Time	Sample ID	Sample Type	TPHG	Benzene	Toluene	Ethyl-benzene	Total Xylenes	MTBE	TBA	DIPE	ETBE	TAME	Methanol	Ethanol
07/06/04	1050	S-2	Water	2200	13	1.8	10	26.9	66	170	<1.0	<1.0	<1.0	<5,000	<5,000
07/08/04	0854	Influent	Water	<100[1]	<0.50	<0.50	0.66	4.4	16	NA	NA	NA	NA	NA	NA
07/08/04	0905	GAC Influent	Water	110	<0.50	<0.50	<0.50	1.89	17	NA	NA	NA	NA	NA	NA
07/08/04	1030	Effluent	Water	<50	<0.50	<0.50	<0.50	<0.50	<0.50	NA	NA	NA	NA	NA	NA
07/19/04	0623	Effluent	Water	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<10	<1.0	<1.0	<1.0	NA	NA
07/19/04	0630	Influent	Water	<50	<0.50	<0.50	<0.50	0.52	3.7	56	<1.0	<1.0	<1.0	NA	NA
07/27/04	1118	Effluent	Water	<50	<0.50	<0.50	<0.50	<0.50	<0.50	<10	<1.0	<1.0	<1.0	NA	NA

All water sample values reported in micrograms per liter (µg/L)
TPHG = Total petroleum hydrocarbons as gasoline
BTEX = Benzene, toluene, ethylbenzene, and total xylenes
MTBE = Methyl tertiary butyl ether
TBA = Tertiary butyl alcohol
DIPE = Di-isopropyl ether
ETBE = Ethyl tertiary butyl ether
TAME = Tertiary amyl methyl ether
NA = Not analyzed
[1] Reporting limits were increased due to sample foaming

Analytical Laboratory
Alpha Analytical , Inc. (ELAP #2019)

Analytical Methods
TPHG analyzed by EPA Method SW8015B/DHS LUFT Manual
BTEX, MTBE, TBA, DIPE, ETBE, & TAME analyzed by EPA Method SW8260B
Methanol & Ethanol analyzed by EPA Method SW8260B-DI

Chan, Barney, Env. Health

From: Steve Carter [scarter@stratusinc.net]
Sent: Thursday, June 30, 2005 3:33 PM
To: Chan, Barney, Env. Health
Subject: Deadline extension, USA Station #57, 10700 MacArthur, Oakland (Site #RO0000232)

Thank you for taking a few minutes to discuss the subject site with me this afternoon. As we discussed, Amir Gholami approved Stratus' work plan for conducting a DPE mass removal event at the subject site in a letter dated May 9, 2005. Amir requested a report on the results of the DPE event by July 9, 2005. However, Stratus initiated the 30-day DPE event on June 6, 2005, and we are scheduled to complete the DPE event on July 6. All the analytical data should have been received from the laboratory by July 15, 2005. We agreed that Stratus will have a report on the DPE event prepared by August, 1, 2005.

Thanks again for your time. If you have questions, you may contact me at 530-676-6008. Gowri Kowtha is the Project Manager, and he will be back in the office July 6. Mr. Kowtha can be reached at 530-676-6001.

Stephen J. Carter, P.G.
Stratus Environmental, Inc.
3330 Cameron Park Drive, Suite 550
Cameron Park, CA 95682
(530)676.6008 direct
(530)676.6005 fax
(916)813.3778 mobile
scarter@stratusinc.net

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

7

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

RO0000232

May 9, 2005

Mr. Chuck Miller
USA Petroleum Corporation
30101 Aguora Court # 200
Agoura Hills, CA 91301

Mr. Hugh K. Phares & Mr. John Jay
Jay-Phares Corporation
10700 MacArthur Blvd.
Oakland, CA 94605

Re: USA Petroleum, 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr. Phares and Mr. Jay:

Alameda County Environmental Health has received and reviewed the "October 15, 2004, Dual Phase Extraction Test Report", by Mr. Gowri S. Kowtha Stratus Environmental Inc., along with other documents regarding the above referenced site.
As you are aware, this office have also had several meetings and or discussions with you and or your representatives as well, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- Per document in our files and the above report there were up to 580 ppb, 590 ppb, 150 ppb, 250 ppb, 990 ppb, and 17,000 ppb of MTBE, Benzene, Toluene, EthylBenzene, Xylenes, and TPHg respectively detected in groundwater during the last monitoring and sampling event. The highest concentration was observed in S-2 monitoring well.

- Groundwater fluctuation has been between 7 to 21 feet bgs historically.

- Flow gradient has been variable with flow gradient southwesterly above S-1 S-2 wells, northerly below S-1, S-2 wells, and southerly south of MW-3 well.

- This office concurs with the proposed workplan.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

July 9,2005 Result of the Work Plan

These reports are being requested pursuant to California Health and Safety Code Section

5296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

Professional Certification

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

AGENCY OVERSIGHT

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

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Gowri S. Kowtha, Stratus Environmental Inc., 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682
D. Drogos, A. Gholami

Gholami, Amir, Env. Health

From: Gowri Kowtha [gkowtha@stratusinc.net]
Sent: Thursday, April 14, 2005 9:49 AM
To: Gholami, Amir, Env. Health
Subject: FW: Draft meeting notes for April 7, 2005

Gowri Kowtha, P.E.
Project Manager
Stratus Environmental, Inc.
(530) 676-6001

-----Original Message-----
From: Ken Phares [mailto:kphares@ix.netcom.com]
Sent: Thursday, April 14, 2005 10:32 AM
To: gkowtha@stratusinc.net
Cc: Peter McIntyre; Stephen Carter
Subject: Re: Draft meeting notes for April 7, 2005

Gowri -

The minutes appear to be accurate and complete; thank you for preparing them.

Ken Phares
510-523-0450
510-812-9137 (cell)

Gowri Kowtha wrote:

> Gentlemen:
>
> Here is the latest version of the minutes, based on input from Amir Gholami. Please find below draft minutes of the meeting we had last week. Please provide input if we are missing something. We will incorporate your comments and finalize the notes. PLEASE PROVIDE ME INPUT NO LATER THAN 12:00 PM TODAY, SO THAT I CAN FINALIZE THE MINUTES.
>
> ---
>
> USA Gasoline Station #57
> 10700 MacArthur Boulevard
> Oakland, CA
> Alameda County Case #RO0000232

Meeting Date: April 7, 2005.

Location: Alameda County Environmental Health Department offices, Alameda, California

Attending:
Amir Gholami, Alameda County
Ken Phares, Jay-Phares Corp.
John Jay, Jay-Phares Corp.
Peter McIntyre, AEI Consultants
Steve Carter, Stratus Environmental, Inc.
Gowri Kowtha, Stratus Environmental, Inc.

1. Reviewed conditions beneath the site, site history, remedial efforts at the site, on-going investigations at other parts of the shopping center, and potential redevelopment plans for the site.

    - subsurface geologic conditions
    - lateral, vertical extent of vadose zone impact
    - lateral extent of dissolved impact.
    - Extent of excavation of UST pit, dispenser islands
    - 30K cubic yards of soil excavated during cleanup of problem at dry cleaners piled on USA site.
    - John says soil clean, he has letter from County saying soil is clean and usable
      Amir asked for a "**stand alone document**" including: Geological cross sections which includes all preferential pathways , plume delineation vertically and monitoring wells with screens identified. Horizontal plume delineations for CoCs, maps showing all borings with their respective CoCs at different depth, and map showing all borings after the excavation (what is left in the soil after all excavations), Tabular groundwater and soil information, etc. per our discussion in the meeting.

2. John Jay and Ken Phares proposed redevelopment options

    - Home Depot or Ross/Big Lots
    - Detailed architectural elevations and civil engineering drawings for both options were presented.
    - Jay-Phares to provide confirmation that one of the options (Ross/Home Depot) for construction will be identified and communicated to all.

3. Discussed closure potential, pathways toward closure
    - discussed the need to establish cleanup goals for both vadose and groundwater impact.
    - Look-up tables vs. site-specific cleanup levels
    - possibility of arguing higher levels than look-up tables (conservative assumptions) - Stratus will evaluate site specific risk based corrective action levels.

4. Discussed potential remedial options
    - Goal is to attain site closure/NFA status in 12 months (per John Jay)
    - Excavation of vadose zone impact
        - o concurrent with site preparation and foundation excavation
        - o John indicated it was possible to perform the rough grading and excavation now.
    - Amir has not reviewed the DPE test report and will approve based on review.
    - Risk assessment of exposure can be acceptable to County

5. Action Items

- Stratus to prepare SCM , based on Amir's request and submit to Alameda County in 2 weeks
- Identify areas where look-up table values exceeded (2/05 RWQCB tables).
- Complete risk assessment, but do identify potential exposure pathways/risks
- Stratus to prepare minutes of meeting
- Stratus to identify additional information that is required from Jay-Phares
- Amir mentioned that he has to complete a file review and does not have complete understanding yet.
- Amir to make decision based on review of the file and discussion with other staff within the agency.

Steve Carter, P.G and Gowri Kowtha, P.E.
Stratus Environmental, Inc.
(530) 676-6004

Gholami, Amir, Env. Health

From: Gowri Kowtha [gkowtha@stratusinc.net]
Sent: Tuesday, April 12, 2005 12:35 PM
To: Gholami, Amir, Env. Health
Cc: Stephen Carter; Chuck Miller
Subject: USA Station #57, 10700 MacArthur Boulevard, Oakland (RO0000232)

Importance: High

Amir:

This email is a follow up to our telephone conversation on April 11, 2005. To clarify, during our conversation, we discussed, the DPE test report submitted by Stratus in October 2004. The report recommended DPE mass removal events to reduce the concentration of petroleum hydrocarbons in groundwater. The mass removal rates attained during the DPE test were low, and DPE did not appear to be economically viable.

However, DPE was successful in removing hydrocarbon mass, and in mobilizing residual TPHG in the soil (as evidenced by the presence of a sheen in well
S-2 subsequent to completion of the DPE test). Other potential remedial technologies (SVE/AS or P&T) did not appear to be viable given site conditions. Because
these data indicated it was technically viable to remove hydrocarbon mass using DPE (even if un-economic), and other remedial options do not appear
technically viable, Stratus recommended implementation of DPE at this site to remove hydrocarbon mass.

In addition, as we discussed, we have limited time frame to perform remediation of groundwater. If a building is going to be located on top of the impacted area (currently limited to onsite wells MW-3, S-1 and S-2), monitoring of the impact to groundwater post construction, might not be feasible. Given these conditions, we plan to initiate DPE at the site around May 1, 2005 and would appreciate your prompt attention to the approval letter.

Please call me if you have any questions.

Gowri Kowtha, P.E.
Project Manager
Stratus Environmental, Inc.
(530) 676-6001

RO 232

Gholami, Amir, Env. Health

From: Gowri Kowtha [gkowtha@stratusinc.net]
Sent: Tuesday, April 12, 2005 12:35 PM
To: Gholami, Amir, Env. Health
Cc: Stephen Carter; Chuck Miller
Subject: USA Station #57, 10700 MacArthur Boulevard, Oakland (RO0000232)

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technically viable, Stratus recommended implementation of DPE at this site to remove hydrocarbon mass.

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Please call me if you have any questions.

Gowri Kowtha, P.E.
Project Manager
Stratus Environmental, Inc.
(530) 676-6001
(916)-804-3614 Cell

USA Petroleum (R0232) 10700 MacArthur 94605 BC Copy

Meeting Date: April 7, 2005.

Location: Alameda County Environmental Health Department offices, Alameda, California

Attending:
Amir Gholami, Alameda County
Ken Phares, Jay-Phares Corp.
John Jay, Jay-Phares Corp.
Peter McIntyre, AEI Consultants
Steve Carter, Stratus Environmental, Inc.
Gowri Kowtha, Stratus Environmental, Inc.

R0232

1. Reviewed conditions beneath the site, site history, remedial efforts at the site, on-going investigations at other parts of the shopping center, and potential redevelopment plans for the site.

- o subsurface geologic conditions
- o lateral, vertical extent of vadose zone impact
- o lateral extent of dissolved impact.
- o Extent of excavation of UST pit, dispenser islands
- o 30K cubic yards of soil excavated during cleanup of problem at dry cleaners piled on USA site.
- o John says soil clean, he has letter from County saying soil is clean and usable

  Amir asked for a "**stand alone document**" including: Geological cross sections which includes all preferential pathways , plume delineation vertically and monitoring wells with screens identified. Horizontal plume delineations for CoCs, maps showing all borings with their respective CoCs at different depth, and map showing all borings after the excavation (what is left in the soil after all excavations), Tabular groundwater and soil information, etc. per our discussion in the meeting.

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- o Home Depot or Ross/Big Lots
- o Detailed architectural elevations and civil engineering drawings for both options were presented.
- o Jay-Phares to provide confirmation that one of the options (Ross/Home Depot) for construction will be identified and communicated to all.

3. Discussed closure potential, pathways toward closure
   - discussed the need to establish cleanup goals for both vadose and groundwater impact.
   - Look-up tables vs. site-specific cleanup levels
   - possibility of arguing higher levels than look-up tables (conservative assumptions) - Stratus will evaluate site specific risk based corrective action levels.

4. Discussed potential remedial options
   - Goal is to attain site closure/NFA status in 12 months (per John Jay)
   - Excavation of vadose zone impact
     - o concurrent with site preparation and foundation excavation
     - o John indicated it was possible to perform the rough grading and excavation now.
   - Amir has not reviewed the DPE test report and will approve based on review.
   - Risk assessment of exposure can be acceptable to County

5. Action Items

- Stratus to prepare SCM, based on Amir's request and submit to Alameda County in 2 weeks
- Identify areas where look-up table values exceeded (2/05 RWQCB tables).
- Complete risk assessment, but do identify potential exposure pathways/risks
- Stratus to prepare minutes of meeting
- Stratus to identify additional information that is required from Jay-Phares
- Amir mentioned that he has to complete a file review and does not have complete understanding yet.
- Amir to make decision based on review of the file and discussion with other staff within the agency.

Steve Carter, P.G and Gowri Kowtha, P.E. 530 - 676-6001
Stratus Environmental, Inc.
(530) 676-6004

SCM: 6/5/2005

DPE - 4 events / 1 per Qtr Monitoring
wanted to install shallow vapor wells

Gholami, Amir, Env. Health

From: Peter McIntyre [pmcintyre@aeiconsultants.com]

Sent: Tuesday, March 08, 2005 3:52 PM

To: Gholami, Amir, Env. Health; 'Ken Phares'; scarter@stratusinc.net; Reed, Bonnie, Env. Health; Tung, Mee Ling, Env. Health

Cc: Chan, Barney, Env. Health; 'John Jay'

Subject: Meeting with Amir March 17, 2005 at 2pm

Ladies and Gentlemen:

This message is sent to confirm the meeting scheduled by Ken Phares, Amir Gholami, and myself regarding the following two issues

1) USA # 57 10700 MacArthur Blvd: Case # RO0000232
2) Former Exxon 10605 Foothill Blvd: Case # RO0002635

The meeting is scheduled for Thursday March 17, 2005 at 2pm at ACHCSA offices.

This meeting to discuss the above is **separate** from the meeting to be scheduled to address the Former Young's Cleaners PCE case at 10700 MacArthur (RO0002580).

Should anyone have any questions or need any information, please contact me. Thank you all for your help with these matters – Peter

Peter McIntyre, P.G.
AEI Consultants
2500 Camino Diablo, Suite 200
Walnut Creek, CA 94597
ph 925/283-6000, ext 104
fx 925/283-6121
cell 925/285-8286

Hwang, Don, Env. Health

From: Hwang, Don, Env. Health
Sent: Wednesday, April 28, 2004 11:50 AM
To: 'scarter@stratusinc.net'
Subject: RE: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

Dear Steve, DPE feasibility testing (as outlined in your work plan dated March 15, 2004 & this email) is approved. Don

-----Original Message-----
From: Steve Carter [mailto:scarter@stratusinc.net]
Sent: Wednesday, April 21, 2004 6:14 PM
To: Hwang, Don, Env. Health
Subject: RE: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

Don:

As discussed in our telephone conversation of April 16, 2004, I have taken the information in my email of April 14 and re-worked it to follow the format of the EPA checklist referenced in your email of April 15. You indicated in our conversation that you relied on this checklist when evaluating DPE proposals.

Much of the information requested in the last three sections of the checklist is not available, as a feasibility test is required to evaluate or quantify these parameters. This is what Stratus has proposed to do, perform a feasibility test at the former USA Gasoline station. Stratus has had good success implementing DPE at gasoline-impacted sites with similar chemical and hydrogeologic conditions as are described for this site. We believe the information presented in the work plan and my subsequent emails substantiate our proposal, and request your approval of the work plan.

USA Gasoline wants to initiate the feasibility testing as quickly as possible so that if remedial actions are supported by the data, they can be implemented prior to start of shopping center construction activities. The equipment that we will utilize to perform the proposed DPE feasibility test becomes available on May 5. We would like to perform the DPE feasibility testing (as outlined in our work plan dated March 15, 2004) the weeks of May 10 and May 17, 2004. We hope that the information summarized in the attached document will assist you in approving our work plan. We would appreciate your immediate attention to this matter. If you have questions or require additional information to assist you in your review, please call me at 530-676-6008.

Steve Carter, R.G.
Stratus Environmental, Inc.

-----Original Message-----
From: Hwang, Don, Env. Health [mailto:don.hwang@acgov.org]
Sent: Thursday, April 15, 2004 9:45 AM
To: 'scarter@stratusinc.net'
Subject: RE: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

Steve, Please take a look: http://www.epa.gov/swerust1/pubs/tum_ch11.pdf

> -----Original Message-----
> From: Steve Carter [mailto:scarter@stratusinc.net]
> Sent: Wednesday, April 14, 2004 8:08 PM
> To: Don, Hwang

> Subject: Case #RO0000232, [redacted]BA Station 57, 10700 MacArthur [redacted]vd,
> Oakland
>
> Don:
>
> Per our telephone conversation this morning, I'm sending you this amended
> rationale for the proposed DPE feasibility test at the subject site. This
> rationale augments and replaces the email I sent you April 13, 2004. In
> this amended rationale, I have attempted to address the applicability of
> DPE to hydrocarbon compounds that have been identified at the site (TPHG,
> BTEX compounds, MTBE, and TBA). This rationale incorporates the text of
> the earlier email, including a re-iteration of the site conditions (as
> discussed in the Stratus' Feasibility Test Work Plan, dated March 15,
> 2004).
>
> Geologic and Hydrogeologic Conditions: Subsurface soil conditions consist
> of (from 10 to more than 40 feet bgs) predominantly silty and clayey sand.
> A laterally continuous stratum of sandy and clayey gravel is encountered
> at approximately 25 feet bgs beneath the northern portion of the site.
> Several lensoidal-shaped bodies (less than 5 feet thick and apparently
> without lateral continuity) are encountered in several borings. This
> sandy unit overlies bedrock consisting of deeply weathered, highly
> fractured silty sandstone and siltstone. Gravel-sized clasts were
> encountered within the bedrock unit in some of the borings. Groundwater
> beneath the site fluctuates between 7 and 21 feet bgs.
>
> Extent of Impact in Soil: Residual soil impact appears restricted to the
> immediate vicinity of the former UST pit and former dispenser islands.
> Impact consists of gasoline hydrocarbons (TPHG and BTEX compounds). In
> the vicinity of the former UST pit, residual impact appears limited to the
> western side of the former excavation. The highest concentrations at the
> furthest lateral extent of the excavation was at 12 to 13 feet bgs on the
> western pit wall, and the low of reported concentrations in soil samples
> from well boring MW-3 effectively constrain the lateral extent in this
> area. Residual hydrocarbon impact was also reported in soil samples
> collected from the base of the former UST pit, at 20 feet bgs. In the
> vicinity of the former dispenser islands, the residual impact appears
> limited the uppermost portion of the soil column (3 to 5 feet bgs).
>
> Extent of Impact in Groundwater: Impact is currently reported in wells
> S-1 and S-2 (well MW-3, inaccessible since 2000, may also be impacted).
> Historically, impact has also been reported in well MW-3. Impact consists
> of TPHG, BTEX compounds, MTBE, and TBA. Historically, the highest
> concentrations of dissolved hydrocarbons are reported in well S-2.
>
> Rationale: Subsurface conditions (silty and clayey sands) at this site
> appear well suited for DPE application. The sandy nature of the soil
> suggests that an applied vacuum should effectively remove residual
> hydrocarbon mass from the unsaturated zone. The screened intervals of the
> existing monitoring wells should allow for soil vapors to be extracted
> from areas with the highest residual concentrations (i.e. in the vicinity
> of former UST pit and former dispenser islands). Fluctuations in
> groundwater elevations over the years have likely left a relatively thick
> (approximately 14 feet) smear zone, and vapor extraction should be
> effective at removing these hydrocarbons. It has been our experience that
> at sites with similar conditions, soil vapor extraction has been effective
> in removing the volatile fraction of residual hydrocarbons (TPHG, BTEX
> compounds) in the vadose zone.
>
> Groundwater elevations at the site are within the range for which DPE is
> viable (less than 20 feet bgs). Extraction of impacted groundwater
> reduces residual hydrocarbon mass remaining beneath the site. Groundwater
> extraction will lower the water table in the area of greatest impact, and
> the use of DPE to extract the groundwater will simultaneously remove
> volatile gasoline fractions sorbed onto the soil particles in the
> capillary fringe and previously saturated zone, keeping the groundwater
> from becoming re-impacted as water levels rise.

>
> Comparison to Other Remedial Technologies:
> * "No action"/intrinsic biodegradation has proven ineffective in reducing hydrocarbon mass to acceptable levels. The plume configuration appears stable, and dissolved concentrations appear stable, exhibiting neither a decreasing or increasing trend over the historic monitoring period. Does not address residual impact in the vadose zone. Gasoline oxygenate compounds (MTBE, TBA) are not readily attenuated by intrinsic biodegradation.
> * Enhanced biodegradation (such as ORC, iSOCs, C-Sparger, Fenton's Reagent, etc.) would require the installation of additional application and monitoring points, and time to diffuse throughout the area of impacted groundwater. Construction of the proposed retail facility would preclude permanent installation of application or monitoring points from the area of greatest groundwater impact, possibly limiting the effectiveness and precluding future monitoring points from the area of greatest impact. Unlikely to affect residual impact in the vadose zone above the current capillary fringe. These technology have proven effective at remediating TPHG and BTEX compounds at some site; in our experience, only C-Sparger (ozone injection) has shown much effect against oxygenate compounds.
> * Groundwater extraction would remove dissolved hydrocarbon mass (including the dissolved MTBE in the vicinity of well S-2), but would not address residual impact in the vadose zone. Would require installation of dedicated extraction points for effective pumping. Effective in removing dissolved hydrocarbon mass (TPHG, BTEX compounds, MTBE, and TBA) when pumping can be effectively sustained.
> * Vapor extraction would remove residual impact from the vadose zone (and possibly the capillary fringe), but would not address the dissolved hydrocarbon mass. Air sparging in conjunction with vapor extraction might also effectively address dissolved TPHG and BTEX compounds, but because of the high solubility of the oxygenate compounds, is unlikely to be effective against the dissolved MTBE and TBA.
> * DPE will effectively remove residual hydrocarbon mass from the vadose zone and dissolved hydrocarbons (including MTBE and TBA) from the saturated zone. The existing groundwater monitoring well network appears adequate to perform the proposed DPE feasibility test without requiring installation of additional extraction points. We believe that DPE can be effectively implemented between now and proposed start of construction activities. DPE appears to be the optimal remedial technology for the site hydrogeologic conditions and the current extent of hydrocarbon impact; DPE can effectively address the residual hydrocarbons identified in the vadose zone (TPHG and BTEX) and in the saturated zone (TPHG, BTEX, MTBE, and TBA); and DPE can be implemented within the physical and time constraints imposed by the pending construction activates.

RO232

Hwang, Don, Env. Health

From: Steve Carter [scarter@stratusinc.net]
Sent: Wednesday, April 21, 2004 6:14 PM
To: Hwang, Don, Env. Health
Subject: RE: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

Station 57 checklist.doc

Don:

As discussed in our telephone conversation of April 16, 2004, I have taken the information in my email of April 14 and re-worked it to follow the format of the EPA checklist referenced in your email of April 15. You indicated in our conversation that you relied on this checklist when evaluating DPE proposals.

Much of the information requested in the last three sections of the checklist is not available, as a feasibility test is required to evaluate or quantify these parameters. This is what Stratus has proposed to do, perform a feasibility test at the former USA Gasoline station. Stratus has had good success implementing DPE at gasoline-impacted sites with similar chemical and hydrogeologic conditions as are described for this site. We believe the information presented in the work plan and my subsequent emails substantiate our proposal, and request your approval of the work plan.

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Steve Carter, R.G.
Stratus Environmental, Inc.

-----Original Message-----
From: Hwang, Don, Env. Health [mailto:don.hwang@acgov.org]
Sent: Thursday, April 15, 2004 9:45 AM
To: 'scarter@stratusinc.net'
Subject: RE: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

Steve, Please take a look: http://www.epa.gov/swerust1/pubs/tum_ch11.pdf

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> Subject: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd,
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> rationale for the proposed [redacted]E feasibility test at the subj[redacted] site. This
> rationale augments and replaces the email I sent you April 13, 2004. In
> this amended rationale, I have attempted to address the applicability of
> DPE to hydrocarbon compounds that have been identified at the site (TPHG,
> BTEX compounds, MTBE, and TBA). This rationale incorporates the text of
> the earlier email, including a re-iteration of the site conditions (as
> discussed in the Stratus' Feasibility Test Work Plan, dated March 15,
> 2004).
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> of (from 10 to more than 40 feet bgs) predominantly silty and clayey sand.
> A laterally continuous stratum of sandy and clayey gravel is encountered
> at approximately 25 feet bgs beneath the northern portion of the site.
> Several lensoidal-shaped bodies (less than 5 feet thick and apparently
> without lateral continuity) are encountered in several borings. This
> sandy unit overlies bedrock consisting of deeply weathered, highly
> fractured silty sandstone and siltstone. Gravel-sized clasts were
> encountered within the bedrock unit in some of the borings. Groundwater
> beneath the site fluctuates between 7 and 21 feet bgs.
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> immediate vicinity of the former UST pit and former dispenser islands.
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> from well boring MW-3 effectively constrain the lateral extent in this
> area. Residual hydrocarbon impact was also reported in soil samples
> collected from the base of the former UST pit, at 20 feet bgs. In the
> vicinity of the former dispenser islands, the residual impact appears
> limited the uppermost portion of the soil column (3 to 5 feet bgs).
>
> Extent of Impact in Groundwater: Impact is currently reported in wells
> S-1 and S-2 (well MW-3, inaccessible since 2000, may also be impacted).
> Historically, impact has also been reported in well MW-3. Impact consists
> of TPHG, BTEX compounds, MTBE, and TBA. Historically, the highest
> concentrations of dissolved hydrocarbons are reported in well S-2.
>
> Rationale: Subsurface conditions (silty and clayey sands) at this site
> appear well suited for DPE application. The sandy nature of the soil
> suggests that an applied vacuum should effectively remove residual
> hydrocarbon mass from the unsaturated zone. The screened intervals of the
> existing monitoring wells should allow for soil vapors to be extracted
> from areas with the highest residual concentrations (i.e. in the vicinity
> of former UST pit and former dispenser islands). Fluctuations in
> groundwater elevations over the years have likely left a relatively thick
> (approximately 14 feet) smear zone, and vapor extraction should be
> effective at removing these hydrocarbons. It has been our experience that
> at sites with similar conditions, soil vapor extraction has been effective
> in removing the volatile fraction of residual hydrocarbons (TPHG, BTEX
> compounds) in the vadose zone.
>
> Groundwater elevations at the site are within the range for which DPE is
> viable (less than 20 feet bgs). Extraction of impacted groundwater
> reduces residual hydrocarbon mass remaining beneath the site. Groundwater
> extraction will lower the water table in the area of greatest impact, and
> the use of DPE to extract the groundwater will simultaneously remove
> volatile gasoline fractions sorbed onto the soil particles in the
> capillary fringe and previously saturated zone, keeping the groundwater
> from becoming re-impacted as water levels rise.
>
> Comparison to Other Remedial Technologies:
> * "No action"/intrinsic biodegradation has proven ineffective in
> reducing hydrocarbon mass to acceptable levels. The plume configuration
> appears stable, and dissolved concentrations appear stable, exhibiting
> neither a decreasing or increasing trend over the historic monitoring

> period. Does not address [redacted]idual impact in the vadose zon[redacted] Gasoline
> oxygenate compounds (MTBE, TBA) are not readily attenuated by intrinsic
> biodegradation.
> * Enhanced biodegradation (such as ORC, iSOCs, C-Sparger, Fenton's
> Reagent, etc.) would require the installation of additional application
> and monitoring points, and time to diffuse throughout the area of impacted
> groundwater. Construction of the proposed retail facility would preclude
> permanent installation of application or monitoring points from the area
> of greatest groundwater impact, possibly limiting the effectiveness and
> precluding future monitoring points from the area of greatest impact.
> Unlikely to affect residual impact in the vadose zone above the current
> capillary fringe. These technology have proven effective at remediating
> TPHG and BTEX compounds at some site; in our experience, only C-Sparger
> (ozone injection) has shown much effect against oxygenate compounds.
> * Groundwater extraction would remove dissolved hydrocarbon mass
> (including the dissolved MTBE in the vicinity of well S-2), but would not
> address residual impact in the vadose zone. Would require installation of
> dedicated extraction points for effective pumping. Effective in removing
> dissolved hydrocarbon mass (TPHG, BTEX compounds, MTBE, and TBA) when
> pumping can be effectively sustained.
> * Vapor extraction would remove residual impact from the vadose zone
> (and possibly the capillary fringe), but would not address the dissolved
> hydrocarbon mass. Air sparging in conjunction with vapor extraction might
> also effectively address dissolved TPHG and BTEX compounds, but because of
> the high solubility of the oxygenate compounds, is unlikely to be
> effective against the dissolved MTBE and TBA.
> * DPE will effectively remove residual hydrocarbon mass from the
> vadose zone and dissolved hydrocarbons (including MTBE and TBA) from the
> saturated zone. The existing groundwater monitoring well network appears
> adequate to perform the proposed DPE feasibility test without requiring
> installation of additional extraction points. We believe that DPE can be
> effectively implemented between now and proposed start of construction
> activities. DPE appears to be the optimal remedial technology for the
> site hydrogeologic conditions and the current extent of hydrocarbon
> impact; DPE can effectively address the residual hydrocarbons identified
> in the vadose zone (TPHG and BTEX) and in the saturated zone (TPHG, BTEX,
> MTBE, and TBA); and DPE can be implemented within the physical and time
> constraints imposed by the pending construction activates.

4/21/04 email

Don:

Per our telephone conversation of Friday afternoon (April 16, 2004) I've summarized the site conditions at the former USA Station no. 57 with respect to the applicability of dual phase extraction. I've structured this summary in the general format of the checklist at the end of the EPA document you sent me. This summary is supplemental to the discussion of site-specific conditions previously sent to you on April 14, 2004. I have discussed the data (below) in order presented in the EPA checklist.

1. Site Characteristics
   a. Permeabilities have been quantified for either the vadose zone or the saturated zone. However, lithologic descriptions suggest that silty and clayey sands are the predominant soil types beneath the site, with lesser amounts of silty and clayey gravels. It has been our experience that soils of the description generally have permeabilities greater than 10^{-12} cm^2.
   b. Cross-sections prepared for this site do not indicate the presence of laterally continuous impermeable layers. Several small lensoidal-shaped bodies of sandy silt have been described, but these do not appear to be laterally continuous.
   c. Soil moisture has not been measured, but vadose zone soil is likely to be less than 85%.
   d. Depth to groundwater has fluctuated between 7 and 21 feet bgs.

2. Constituents Characteristics
   a. TPHG and BTEX have been reported in both the vadose and saturated zones. MTBE has also been reported in the groundwater. The vapor pressures of these compounds are all greater than 0.5 inches mm, the boiling points are less than 300°C. The Henry's Law constants for TPHG and BTEX are greater than 100 atm. I found a range of values for the Henry's Law constant for MTBE, the lowest below 100 atm, and the highest above 100 atm.

	Vapor Pressure (mm Hg)	Boiling Point (°C)	Henry's Law Constant (atm.)
Benzene	75	79	245
Toluene	20	110	149
Ethylbenzene	10	135	163
Xylenes	7-9	130-143	258
MTBE	245-256	55	32-163

   b. The sorptive capacities have not been determined. The organic carbon content of the soils beneath the site has not analyzed.

3. Evaluation of DPE System Design
   a. ROI (for both soil vapor and groundwater), expected wellhead vacuum, soil vapor and groundwater influent concentrations, and the soil vapor and groundwater extraction flow rates will be determined during the proposed feasibility test.

b. Specific cleanup times and concentrations, soil volumes to be treated, pore volume exchange rate, and other potential design considerations will be addressed by the feasibility testing.

4. Optional DPE components
    a. The need for land surface seals will be evaluated during the feasibility testing.
    b. The need for air injection or passive inlet wells will also be evaluated during the feasibility testing.

5. Operation and Monitoring Plans
    a. Flow measurements, constituent concentrations, and vacuum readings will be monitored daily during the feasibility testing.
    b. If DPE is continued after the feasibility testing period, system operation parameters will be monitored as often as necessary to ensure effective system operation.

Hwang, Don, Env. Health

From: Steve Carter [scarter@stratusinc.net]
Sent: Wednesday, April 14, 2004 8:08 PM
To: Don, Hwang
Subject: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

Don:

Per our telephone conversation this morning, I'm sending you this amended rationale for the proposed DPE feasibility test at the subject site. This rationale augments and replaces the email I sent you April 13, 2004. In this amended rationale, I have attempted to address the applicability of DPE to hydrocarbon compounds that have been identified at the site (TPHG, BTEX compounds, MTBE, and TBA). This rationale incorporates the text of the earlier email, including a re-iteration of the site conditions (as discussed in the Stratus' *Feasibility Test Work Plan,* dated March 15, 2004).

Geologic and Hydrogeologic Conditions: Subsurface soil conditions consist of (from 10 to more than 40 feet bgs) predominantly silty and clayey sand. A laterally continuous stratum of sandy and clayey gravel is encountered at approximately 25 feet bgs beneath the northern portion of the site. Several lensoidal-shaped bodies (less than 5 feet thick and apparently without lateral continuity) are encountered in several borings. This sandy unit overlies bedrock consisting of deeply weathered, highly fractured silty sandstone and siltstone. Gravel-sized clasts were encountered within the bedrock unit in some of the borings. Groundwater beneath the site fluctuates between 7 and 21 feet bgs.

Extent of Impact in Soil: Residual soil impact appears restricted to the immediate vicinity of the former UST pit and former dispenser islands. Impact consists of gasoline hydrocarbons (TPHG and BTEX compounds). In the vicinity of the former UST pit, residual impact appears limited to the western side of the former excavation. The highest concentrations at the furthest lateral extent of the excavation was at 12 to 13 feet bgs on the western pit wall, and the low of reported concentrations in soil samples from well boring MW-3 effectively constrain the lateral extent in this area. Residual hydrocarbon impact was also reported in soil samples collected from the base of the former UST pit, at 20 feet bgs. In the vicinity of the former dispenser islands, the residual impact appears limited the uppermost portion of the soil column (3 to 5 feet bgs).

Extent of Impact in Groundwater: Impact is currently reported in wells S-1 and S-2 (well MW-3, inaccessible since 2000, may also be impacted). Historically, impact has also been reported in well MW-3. Impact consists of TPHG, BTEX compounds, MTBE, and TBA. Historically, the highest concentrations of dissolved hydrocarbons are reported in well S-2.

Rationale: Subsurface conditions (silty and clayey sands) at this site appear well suited for DPE application. The sandy nature of the soil suggests that an applied vacuum should effectively remove residual hydrocarbon mass from the unsaturated zone. The screened intervals of the existing monitoring wells should allow for soil vapors to be extracted from areas with the highest residual concentrations (i.e. in the vicinity of former UST pit and former dispenser islands). Fluctuations in groundwater elevations over the years have likely left a relatively thick (approximately 14 feet) smear zone, and vapor extraction should be effective at removing these hydrocarbons. It has been our experience that at sites with similar conditions, soil vapor extraction has been effective in removing the volatile fraction of residual hydrocarbons (TPHG, BTEX compounds) in the vadose zone.

Groundwater elevations at the site are within the range for which DPE is viable (less than 20 feet bgs). Extraction of impacted groundwater reduces residual hydrocarbon mass remaining beneath the site. Groundwater extraction will lower the water table in the area of greatest impact, and the use of DPE to extract

the groundwater will simultaneously remove volatile gasoline fractions sorbed onto the soil particles in the capillary fringe and previously saturated zone, keeping the groundwater from becoming re-impacted as water levels rise.

Comparison to Other Remedial Technologies:

- "No action"/intrinsic biodegradation has proven ineffective in reducing hydrocarbon mass to acceptable levels. The plume configuration appears stable, and dissolved concentrations appear stable, exhibiting neither a decreasing or increasing trend over the historic monitoring period. Does not address residual impact in the vadose zone. Gasoline oxygenate compounds (MTBE, TBA) are not readily attenuated by intrinsic biodegradation.
- Enhanced biodegradation (such as ORC, iSOCs, C-Sparger, Fenton's Reagent, etc.) would require the installation of additional application and monitoring points, and time to diffuse throughout the area of impacted groundwater. Construction of the proposed retail facility would preclude permanent installation of application or monitoring points from the area of greatest groundwater impact, possibly limiting the effectiveness and precluding future monitoring points from the area of greatest impact. Unlikely to affect residual impact in the vadose zone above the current capillary fringe. These technology have proven effective at remediating TPHG and BTEX compounds at some site; in our experience, only C-Sparger (ozone injection) has shown much effect against oxygenate compounds.
- Groundwater extraction would remove dissolved hydrocarbon mass (including the dissolved MTBE in the vicinity of well S-2), but would not address residual impact in the vadose zone. Would require installation of dedicated extraction points for effective pumping. Effective in removing dissolved hydrocarbon mass (TPHG, BTEX compounds, MTBE, and TBA) when pumping can be effectively sustained.
- Vapor extraction would remove residual impact from the vadose zone (and possibly the capillary fringe), but would not address the dissolved hydrocarbon mass. Air sparging in conjunction with vapor extraction might also effectively address dissolved TPHG and BTEX compounds, but because of the high solubility of the oxygenate compounds, is unlikely to be effective against the dissolved MTBE and TBA.
- DPE will effectively remove residual hydrocarbon mass from the vadose zone and dissolved hydrocarbons (including MTBE and TBA) from the saturated zone. The existing groundwater monitoring well network appears adequate to perform the proposed DPE feasibility test without requiring installation of additional extraction points. We believe that DPE can be effectively implemented between now and proposed start of construction activities. DPE appears to be the optimal remedial technology for the site hydrogeologic conditions and the current extent of hydrocarbon impact; DPE can effectively address the residual hydrocarbons identified in the vadose zone (TPHG and BTEX) and in the saturated zone (TPHG, BTEX, MTBE, and TBA); and DPE can be implemented within the physical and time constraints imposed by the pending construction activates.

Hwang, Don, Env. Health

From: Steve Carter [scarter@stratusinc.net]
Sent: Friday, April 09, 2004 10:48 AM
To: Don, Hwang
Cc: Phares, Ken; McIntyre, Peter
Subject: Case #RO0000232, USA Station 57, 10700 MacArthur Blvd, Oakland

This morning I spoke with Mr. John Jay of Jay-Phares, the property owner and developer regarding the foundation and slab design. He indicated that the Ross store, planned to be situated over the former location of the gasoline station, will be 30,000 square feet of retail space. Typical foundation construction for this type of facility would generally be 6 to 9 inches of concrete slab over a pad of compacted dirt and a gravel base. A plastic sheath (Visqueen) to prevent moisture or vapor intrusion can also be installed.

Mr. Jay indicated that at this time, the tenants for this development (including Ross) have not signed a lease. The necessary soil sampling required for the foundation engineering calculations will not be implemented until the lease is signed. Therefore, until the lease is signed, the soil sampling will not be implemented, the engineering calculations will not be completed, and the final design of the foundation slab will not be completed. When the design is finaled (and at this time, I have no idea when that would be), Mr. Jay will forward the design specifics to me to be forwarded to your office. Until that time, I cannot provide any additional information regarding the foundation and slab design, as requested in your letter of January 28, 2004.

Stephen J. Carter, R.G.
Project Manager
Stratus Environmental, Inc.
3330 Cameron Park Drive, Suite 550
Cameron Park, CA 95682
530.676.6008 direct
916.813.3778 cell
530.676.6004 main
530.676.6005 fax
scarter@stratusinc.net

Hwang, Don, Env. Health

From: Steve Carter [scarter@stratusinc.net]
Sent: Thursday, April 08, 2004 3:31 PM
To: Don, Hwang
Subject: USA #57, 10700 MacArthur Boulevard, Oakland

Don:

On March 15 we submitted a Feasibility Test Work Plan. This work plan proposed a dual-phase extraction feasibility test. I assume by now you've had a chance to glance through it. If you have any questions, or need any additional info to complete your evaluation of the proposed scope of work, please let me know right away.

We're putting together a 45-day schedule for performing feasibility tests and installing extraction and treatment systems at several of our sites. Barring any objection from your office, we'd like to include the feasibility testing at this site, and are prepared to implement the proposed scope of work as soon as we have your approval of the Work Plan.

Thanks in advance for your attention to this matter.

Stephen J. Carter, R.G.
Project Manager
Stratus Environmental, Inc.
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916.813.3778 cell
530.676.6004 main
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scarter@stratusinc.net

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

January 28, 2004

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court
Agoura Hills, CA 91301-4311

Dear Mr. Dasappa:

Subject: Fuel Leak Case No. RO0000252, USA Station #57, 10700 MacArthur Blvd., Oakland, CA 94605

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan for Monitoring Well Replacement" dated January 14, 2004 and "Quarterly Groundwater Monitoring Report, Fourth Quarter 2003" dated January 12, 2004, both by Stratus Environmental, Inc. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Building plans - A retail shopping pavilion will be constructed over the former USA site and the ground surface elevation of the former service station will likely be lowered by approximately six feet. We have received a diagram showing locations of the proposed buildings. We have requested foundation and slab drawings of the proposed buildings and have been notified that they will not be available for at least 45 days. Please submit.
2) Monitoring well screens - The proposed monitoring wells indicate screened intervals of 15 feet in length. We request that your monitoring network be depth discrete, generally, screened intervals of 3 to 5 feet in length. Please include in the Work Plan Addendum.
3) Boring Sampling - Instead of collecting soil boring samples every 5 ft. as proposed, soil samples shall be collected at a minimum of every 5 ft., including at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination. Please include in the Work Plan Addendum.
4) Groundwater Analyses – Ethylene Dichloride (EDC) has not been included for analyses of grab and monitoring well groundwater samples, and soil samples as requested. If detected, and determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Please include in the Work Plan Addendum.

5) Remedial actions - Methods other than what has been proposed will be submitted. Please include in the Work Plan Addendum.

TECHNICAL REPORT REQUEST

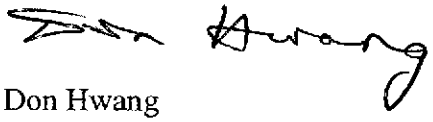
Please submit technical reports to the Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

January 31, 2004 - Quarterly Groundwater Monitoring Report, Fourth Quarter 2003
March 28, 2003 - Work Plan Addendum
60 days after Work Plan approval - Soil and Water Investigation Report
April 30, 2004 – Quarterly Groundwater Monitoring Report, First Quarter 2004
July 31, 2004 - Quarterly Groundwater Monitoring Report, Second Quarter 2004
October 31, 2004 - Quarterly Groundwater Monitoring Report, Third Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Steve Carter, Stratus Environmental, 3330 Cameron Park Dr., Suite 550, Cameron Park, CA 95682
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

September 19, 2003

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court
Agoura Hills, CA 91301-4311

Dear Mr. Dasappa:

Subject: Fuel Leak Case No. RO0000232, USA Station #57, 10700 MacArthur Blvd., Oakland, CA 94605

Alameda County Environmental Health (ACEH) staff has reviewed "Closure Information/Proposal" dated April 26, 2002 by GHH Engineering, Inc. We do not believe that site closure is warranted. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Building plans - Your consultant, Stratus Environmental, stated that the property owner wants to construct a building on the site. We have received a diagram showing an outline of the building's location. We have requested but not have received information about the building's foundation or basement. Please submit.

2) Verification monitoring of soil and groundwater is required after the proposed injection of the ORC slurry. The abandonment of existing monitoring wells is proposed. Please propose how verification monitoring will be performed in the work plan requested below.

3) ORC slurry injection zones - Borings B-2 and B-3, located south of the tank excavation, detected up to 240 mg/kg Total Petroleum Hydrocarbons-Gasoline (TPH-G) with concentrations increasing with depth. Please evaluate a southerly expansion of the ORC slurry injection zones in the work plan requested below.

4) Monitoring wells S1 and S2 – We are missing the well logs and the soil boring sample concentrations. Please provide.

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

6) Groundwater Analyses – We request that you include the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of grab and monitoring well groundwater samples, and soil samples. If any of these compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.

TECHNICAL REPORT REQUEST

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

October 31, 2003 - Quarterly Groundwater Monitoring Report, Third Quarter 2003
November 19, 2003 - Work Plan
January 31, 2004 - Quarterly Groundwater Monitoring Report, Fourth Quarter 2003
60 days after Work Plan approval - Soil and Water Investigation Report
April 30, 2004 – Quarterly Groundwater Monitoring Report, First Quarter 2004
July 31, 2004 - Quarterly Groundwater Monitoring Report, Second 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: Steve Carter, Stratus Environmental, 3330 Cameron Park Dr., Suite 550, Cameron Park, CA 95682
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 24, 1999
StID # 4490

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court
Agoura Hills, CA 91301-4311

Re: USA Station #57, 10700 MacArthur Blvd., Oakland, CA 94605

Dear Mr. Dasappa:

Our office last wrote to you in my October 5, 1998 letter, which responded to the GHH Second Quarter Groundwater Monitoring report and Risk Assessment and Closure Request for the above site. At that time, our office felt that additional investigation would be required before we could recommend the site for closure, in addition to requesting a copy of the most recent groundwater monitoring report. The letter also requested the analysis of bio-indicator parameters, an estimation for the amount of oxygen-releasing compound to be added to groundwater and verification of MTBE concentrations using a GC/MS method. To date, our office has not received any reply to these requests.

To facilitate site closure, our office requests the following:

- Please sample monitoring wells S-1, S-2 and MW-3 for the parameters; TPHg, TPHd, BTEX and MTBE using GC/MS method 8240 or 8260. Please take groundwater elevation readings from all wells and generate a groundwater gradient map. The other wells need not be analyzed for petroleum contaminants based upon historical data.
- Please collect a groundwater sample from MW-5 and from well S-2 and run these samples for the bio-parameters; dissolved oxygen, nitrate, sulfate and oxidation-reduction potential. These samples will act as "background" and within the heart of the plume samples. The results of these tests should be evaluated against what is typically expected during aerobic bio-degradation.
- Please estimate the amount of oxygen and oxygen-releasing compound necessary to treat the residual petroleum hydrocarbon. You may use a software program like that used by Regenesis. Please provide a brief description or work plan for the addition of the oxygen-releasing compound if more borings are necessary to add the required amount of ORC.
- Please provide a Tier 1 Risk Based Corrective Action (RBCA) evaluation for the residual contaminants in soil and groundwater. The prior risk evaluation did not include any evaluation of the historical analytical results.

Please perform the above items and provide the requested reports and information to our office **within 45 days or by July 6, 1999.** You may contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

C. **B. Chan, files**
Mr. V. Bennett, GHH Engineering, Inc., 8084 Old Auburn Rd., Suite E, Citrus Heights, CA, 95610
Mr. Ken Phares, Jay-Phares Corp., 10700 MacArthur Blvd., Suite 200, Oakland 94605-5260
2ORC&RA10700

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
DAVID J. KEARS, Agency Director

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

October 5, 1998
StID # 4490

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court
Agoura Hills, CA 91301-4311

Re: USA Station #57, 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr. Dasappa:

Our office has received and reviewed the GHH Second Quarter Groundwater Monitoring report and the Risk Assessment and Closure Request Report for the above site. We have also spoke with Mr. Vern Bennett of GHH regarding our concerns with the closure request. We have concurred that additional investigation should be done to justify the closure request. We addressed the following items:

- The most recent groundwater monitoring report will be sent to our office. I was notified that a monitoring event has recently been done and the report was forthcoming.
- A round of sampling will be done to determine the bio-indicator paramters; dissolved oxygen, nitrate, sulfate, carbon dioxide and alkalinity in addition to the oxidation-reduction potential. It was suggested that monitoring wells MW5 and MW8 would be used as the background wells and wells MW3 , S1 and S2, the impacted wells.
- An estimate of the mass of residual petroleum hydrocarbon plume will be done using calculations similar to that in the Regenesis software. From this, an estimate will also be made of the amount of oxygen and oxygen releasing compound needed to treat this amount of hydrocarbon.
- Your consultant was going to check if MTBE was ever confirmed using EPA Method 8260 or 8240. This should be done on those wells exhibiting MTBE prior to site closure.

Based on the above additional actions, our office will reconsider the closure request.

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

Barney M. Chan
Hazardous Materials Specialist

C: **B. Chan, files**
Mr. V. Bennett, GHH Engineering, Inc., 8084 Old Auburn Rd., Suite E, Citrus Heights, CA, 95610

ORC10700

ALAMEDA COUNTY
HEALTH CARE SERVICES
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May 21, 1998
StID #4490

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court, Ste. 200
Agoura Hills, CA 91301-4311

RE: USA Gasoline Station #57, 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr.Dasappa:

Our office has received and reviewed the First Quarter 1998 Groundwater Monitoring Report for the above site prepared by GHH Engineering, Inc. It is their opinion that groundwater monitoring continue at the site. Our office concurs with this opinion. I suggest that you omit the sampling and analysis of groundwater for wells MW-4, MW-5, MW-6 and MW-7.

After the next monitoring event, please have your consultant evaluate the site for closure. It appears that this site may be exhibiting a stabilized gasoline plume.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. Vern Bennett, GHH Engineering, Inc., 8084 Old Auburn Rd., Suite E, Citrus Heights, CA 95610

Mon10700

Cal/EPA

State Water Resources Control Board

Division of Clean Water Programs

Mailing Address:
P.O. Box 944212
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94244-2120

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

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

#4490
RC

ENVIRONMENTAL PROTECTION
97 NOV -7 PM 3:49

Pete Wilson
Governor

OCT 30 1997

C D Nichols
USA Gasoline Corp
30101 Agoura Ct #200
Agoura Hills, CA 91301

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 9077, FOR SITE ADDRESS: 10700 MCARTHUR BLVD, OAKLAND 94605

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed $75,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

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

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

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain *preapproval of costs* for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call Steve Marquez, our Technical Reviewer assigned to claims in your Region, at (916) 227-0746. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.

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

- "Reimbursement Request Instructions" package. **Retain this package for future reimbursement requests**. These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are samples of completed reimbursement request forms and spreadsheets.

- "Bid Summary Sheet" to list information on bids received which **must be completed and returned**.

- "Reimbursement Request" forms which you **must use to request reimbursement of costs incurred**.

- "Spreadsheet" forms which you **must use in conjunction with your reimbursement request**.

- "Claimant Data Record" (Std. Form 204) which **must be completed and returned with your first reimbursement request.**

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

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

Sincerely,

Dave Deaner, Manager
UST Cleanup Fund Program

Enclosures

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

#4490

Park Environmental

FACSIMILE MEMORANDUM

No. of Pages 2

DATE: April 4, 1997

TO: Mr. Barney Chin
Alameda County Health

FROM: Mr. Vern Bennett
The Park Corporation

FAX #: (510) 337-9335

SUBJECT: WELL DRILLER'S REPORTS
INSPECTION REQUEST AND AGREEMENT

Please sign and return the attached form via fax #(916) 723-7698. If you have any questions, please call me at (916) 723-1776.

Thank You,

If you have any problems receiving this facsimile, please call Ann at (916) 723-1776.

8084 Old Auburn Road, Suite E, Citrus Heights, CA TEL: (916) 723-1776 FAX: (916) 723-7698

State of California
Department of Water Resources
Central District
3251 S Street
Sacramento, CA 95816-7017

WELL DRILLER'S REPORTS
INSPECTION REQUEST AND AGREEMENT

Project: USA STATION #57

Location: 10700 MacARTHUR BOULEVARD, OAKLAND, CALIFORNIA

County: ALAMEDA Contract Number: _____

Request is made pursuant to Section 13751 of the California Water Code for permission to inspect or copy Water Well Driller's Reports which are on file in your office.

In accordance with the requirements of Section 13752 of the Water Code, it is stipulated and agreed that such reports, or any copy or copies made thereof, will not be made available for inspection by the public but will be used solely by this governmental agency for making studies. If copies are made or taken, each copy will be stamped "CONFIDENTIAL" or "FOR OFFICIAL USE ONLY" and will be kept in a restricted file, access to which is limited to the staff of this governmental agency or to its contracted agents. Any copies furnished to contracted agents must be returned to the Department of Water Resources, Central District upon completion of work by the contracted agent.

No information contained in these reports can be disseminated or published without the written permission of the owner of the well.

THE PARK CORPORATION Contracted Agent	ALAMEDA COUNTY HEALTH AGENCY DEPARTMENT OF ENVIRONMENTAL HEALTH Governmental Agency
8084 OLD AUBURN ROAD #E Address	1131 HARBOR BAY PARKWAY Address
CITRUS HEIGHTS, CA 95610 City, State, & Zip Code	ALAMEDA, CALIFORNIA 94502 City, State, & Zip Code
By KATHLEEN A. WALDO &/or VERN A. BENNETT Officer	By Barney Chan Officer
STAFF ENGINEER &/or PROJECT GEOLOGIST Title	HAZARDOUS MATERIALS SPEC. Title
(916) 723-1776 Telephone	(510) 567-6577 Telephone
APRIL 4, 1997 Date	Date

For Departmental Information: ____ copies sent

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

January 21, 1997
StID # 4490

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

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court, Suite 200
Agoura Hills, CA 91391-092

Re: Former USA Gasoline Station #57, 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr. Dasappa:

Our office last corresponded with you in my April 2, 1996 letter which commented on the February 26, 1996 Alton Geoscience site assessment report. This report provided the results of the drilling and installation of five monitoring wells (MW-4 through MW-8). Our office agreed with the conclusion of this report, that the soil and groundwater contamination is confined to an area close to the former underground tanks and quarterly groundwater monitoring should be performed on all wells. Our office requested that you analyze all wells for the analytes: TPHg, TPHd, BTEX and MTBE.

Our office has not received any quarterly groundwater monitoring reports since then. We have recently been contacted by Ms. Cheryl Gordon of the SWRCB Clean-Up Fund. Based upon the lack of groundwater monitoring, this site is deemed to be out of compliance and your application to the Fund is in jeopardy.

Please initiate groundwater monitoring immediately and send our office a copy of the monitoring report as soon as possible. Our office will be in contact with the Clean-Up Fund to update them on USA Petroleum's actions.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

c: Ms. Ailsa LeMay, Alton Geoscience, 30A Lindbergh Ave., Livermore, CA 94550
Jay Phares Corp., Drake Builders, 10700 MacArthur Blvd., Oakland CA 94605
C. Gordon, SWRCB, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120
B. Chan, files qmrUSA

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

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

April 2, 1996
StID # 4490

Mr. Srikanth Dasappa
USA Gasoline Corporation
30101 Agoura Court, Suite 200
Agoura Hills, CA 91391-092

Re: Former USA Gasoline Station #57, 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr. ~~Geary:~~

Our office has received and reviewed the February 26, 1996 Supplemental Site Assessment Report for the above site as prepared by your consultant, Alton Geoscience. This report details the results from the drilling and installation of five groundwater monitoring wells (MW-4 through MW-8). The general conclusion of this report is that the soil and groundwater contamination is confined to an area close to the former underground tanks. Further delineation of contamination is therefore not necessary. Quarterly groundwater monitoring is recommended for all wells.

Our office agrees with the findings of this report and the recommendation for quarterly monitoring. Please continue immediately to analyze all wells for the analytes: TPHg, TPHd, BTEX and MTBE. Based on obtaining consistent monitoring results, you should then propose a corrective action plan consistent with site closure.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

c: Ms. Ailsa LeMay, Alton Geoscience, 30A Lindbergh Ave., Livermore, CA 94550
Jay Phares Corp., Drake Builders, 10700 MacArthur Blvd., Oakland CA 94605
G. Coleman, files

monUSA

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

October 13, 1995
StID # 4490

USA Gasoline Corporation
Mr. Srikanth Dasappa
30101 Agoura Court, Ste 200
Agoura Hills, CA 91301-4311

Re: Comment on July 27, 1995 Alton Geoscience Site Assessment Workplan for 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr. Dasappa:

Our office has received and completed its review of the above work plan as provided by your consultant, Alton Geoscience. Recall, this work plan calls for the installation of four additional monitoring wells, one upgradient and three downgradient, in an attempt to determine the limits of the groundwater contaminant plume originating from the former USA Gasoline station. This approach is acceptable, however, our office requests that an additional groundwater monitoring well be installed immediately downgradient to the former pump island dispensers. You will note that the proposed downgradient wells are located approximately 100 feet from the existing wells, S-1 and S-2. In order to get a better idea as to the migration and attenuation of contamination downgradient to the original wells, this additional well is requested. You may contact me to discuss this matter if necessary. Should you agree with this approach, you may have your consultant send a map indicating the location of the additional well.

Our office also has noticed that you have failed to institute quarterly groundwater monitoring for this site. After the installation of MW-3 in March of 1995 only groundwater elevation readings were taken in July of 1995. Please be aware in accordance to Title 23, Division 3, Chapter 16, Section 2652(d), until investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every three months or more frequently as specified by the agency ie quarterly reports are required. These reports should be submitted to our office **within 45 days of each monitoring event.** Please initiate quarterly monitoring until a change in monitoring requencey is agreed upon our agency or that of the RWQCB.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

Barney M. Chan
Hazardous Materials Specialist

cc: Ms. Ailsa LeMay, Alton Geoscience, 30A Lindbergh Ave., Livermore, CA 94550
Mr. H. Phares, Jay Phares Corp., 10700 MacArthur Blvd., #200, Oakland CA 94605
G. Coleman, files

wpUSA

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Director

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

August 01, 1995

9082

ATTN: Mr Richard Gilcrease

Drake Builders
5201 Sacramento Ave
Richmond CA 94804

RE: Project # 2603A - A
at 10700 Mac Arthur Blvd #9 in Oakland 94605

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of $900.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Barney Chan at (510) 567-6700.

Sincerely,

Tom Peacock, Acting Chief
Environmental Protection Division

c: files/inspector

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name USA Petroleum Today's Date 2/28/95

Site Address 10700 MacArthur Blvd

City Oak Zip 94605 Phone _____

_____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
____ III. Underground Storage Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

On site to witness the installation (drilling) of 1 MW as proposed by Alton Geoscience.
Bayland Drilling are the drillers
- Both Kevin Keenan & Alicia LeMay present from Alton.
- Encountered a mix of silty clay + gravelly fractured rock. -
- Did not encounter GW until ≈ 35-40'.
Based on the boring log of the 2 onsite wells, well drill to 40' + allow hole to hopefully fill with water. The other wells encountered water ~38' which equilibrated @ ~16' BGS.
The borings were marked + concrete cut per the locations on the WP map.

II, III

Contact _____

Title _____

Signature _____

Inspector B. Chan

Signature B. Chan

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

February 15, 1995
StID # 3756

Mr. Michael Whelan
ARCO Products Co.
2155 S. Bascom Ave., Suite 202
Campbell CA 95008

Re: Request for Copies of Technical Reports and Comment on Oct. 1994 Work Plan for Additional Subsurface Investigation at 10600 and 10700 Mac Arthur Blvd., Oakland CA 94605

Dear Mr. Whelan:

Thank you for providing our office with an update of the investigation at the above ARCO station. It does appear that our office is lacking a number of technical reports appearing on the list of reports given to me. I have noted these missing documents by placing a check next to the document and would appreciate receiving copies of these documents as soon as possible.

A degree of my concerns were addressed during our meeting. These concerns concerned the extent of the petroleum investigation on the Foothill Shopping Square property. Apparently, the bulk of this work is documented in the missing reports I've requested. Certain questions regarding the amounts of gasoline having been removed from offsite and the shallow groundwater gradient should be clarified in the missing reports.

In regards to your October 1994 Work Plan for additional off-site remediation, our office approves of the plan to supplement the existing offsite VES system on the Foothill Shopping Square property with larger diameter vapor wells and sparging wells. We do understand that there may be some opposition to this action from the owners of the Foothill Shopping Square. It is hopefull that the upcoming Pre-enforcement hearing at the County's office will clarify this situation.

At the same time, the responsibility for the chlorinated solvent contamination will be determined at this hearing. You should be prepared at that time to detail ARCO's plan for further site characterization and/or remediation. A revised timetable for future work may be required.

Please provide the requested technical reports **within 30 days or by March 17, 1995.** You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
S. Arigala, RWQCB
J. Young, 1921 Ringwood Avenue, San Jose, CA 95131-1721
Mr. R. Gilcrease, Drake Builders, 5201 Sacramento Ave., Richmond CA 94804
E. Howell, files
Arco276

Alameda County Health Care Services Agency, Department of Environmental Health, Hazardous Materials Division

In Re The Property Known As :) **ARCO Station # 276)** **10600 MacArthur Blvd. and)** **Foothill Shopping Center** **10700 MacArthur Blvd.** **Oakland CA 94605** (insert address of property)	**Notice of Pre-Enforcement Review Panel**

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on **March 28, 1995** at **9:00** am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. Michael Whelan, ARCO Products Co.,
(name)
2155 S. Bascom Ave., Suite 202, Campbell CA 95008
(address)
2. Mr. Richard Gilcrease, Draker Builders,
(name)
5201 Sacramento Ave., Richmond, CA 94804
(address)

Dated: 2/15/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of Environmental Health, Hazardous Materials Division

Post-It™ brand fax transmittal memo 7671	# of pages ▸ 3
To John Jay	From B. Chan
Co. Jay-Phares	Co. ACEH-LOP
Dept.	Phone # 567-6765
Fax # 562-9501	Fax #

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700

StID 4490

November 2, 1994

Mr. Srikanth Dasappa
USA Gasoline Corp
30101 Agoura Ct, Suite 200
Agoura Hills, CA 91301-0092

RE: Workplan Approval for 10700 MacArthur Blvd, Oakland 94605

Dear Mr. Dasappa:

I have completed review of Alton Geoscience's September 1994 Preliminary Site Assessment Workplan for the above referenced site. The proposal to advance up to nine soil borings and converting one into a monitoring well (southwest of the tank pit) to delineate the extent and severity of soil and groundwater contamination at the site is acceptable. The following changes/additions should be noted:

1. Soil samples should be collected at 5-foot intervals, and at changes in lithology and obvious contaminated soil from each soil boring,

2. Analysis for total lead is not necessary at this time since elevated levels were not detected in soil samples collected at the time of tank removal,

3. A 25 foot screened interval appears to be longer than necessary, unless large seasonal fluctuations in groundwater elevations are known. Normal screened interval is 5 feet above and 10 feet below first encountered groundwater in an unconfined aquifer. The geologist onsite should best determine the screened interval length.

4. If obvious soil contamination is noted south, southeast and southwest of the tank pit is noted, additional soil borings may be required.

Field work should commence within 45 days of the date of this letter, or **by December 19, 1994.** Be advised that Mr. Barney Chan will be the new case worker for this site. Future reports should be sent to his attention. Also, he should be notified at least 72 hours prior to the start of any field work.

To date we are not in receipt of a monitoring well installation report for the existing wells S-1 and S-2. This report is due **within 30 days of the date of this letter.**

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions or comments about the content of this letter, please contact Mr. Barney Chan at (510) 567-6765.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Kevin Keenan, Alton Geoscience, 30A Lindbergh Ave, Livermore, CA 94550
Jay Phares Corp, 10700 MacArthur, Suite 200, Oakland 94605
files/Barney Chan

USA GASOLINE

USA Gasoline Corporation
30101 Agoura Court, Suite 200
Agoura Hills, CA 91301-4311
Office: (818) 865-9200
Fax: (818) 865-0092

FAX Transmittal

DATE: 11/2/94
FROM: SRIKANTH
TO: Ms. EVA CHU / Mr. BARNEY CHEN.
COMPANY: Alameda County Health Dept
FAX NO.: (510) 337-9335

TOTAL NUMBER OF PAGES (INCLUDING TRANSMITTAL PAGE): 5

NOTE: IF YOU HAVE ANY DIFFICULTY IN RECEIVING THE TOTAL NUMBER OF PAGES INDICATED ABOVE, PLEASE CALL me AT (818) 865-9200, EXT. 214

COMMENTS:

Please find enclosed soil boring data and Monitoring well construction details for S-1 and S-2

Please send me via fax your approval to our Work plan as soon as possible.

Thankyou very much for your co-operation.

S1

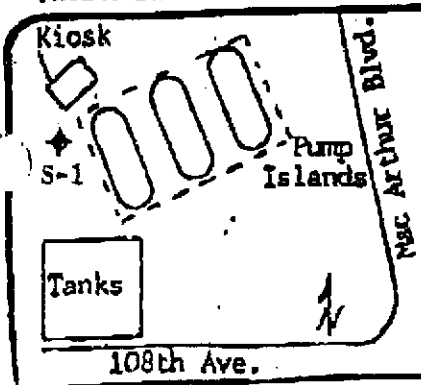
#82015

PACIFIC ENVIRONMENTAL GROUP, INC.

INV ✓ AO ✓

25/3W29M2

JOB NO. 100-22.01



SHELL OIL COMPANY -- WELL LOG

PAGE 1 OF 2

WELL NUMBER	S-1	LOCATION	Oakland
DATE	2/12/87	WEATHER	Cool, rain
LOGGED BY	DM	DRILLED BY	Bayland: Ed, Curt
DRILLING METHOD	HSA	SAMPLING METHOD	Cal. Mod.
GRAVEL PACK	CA	SEAL	Bentonite & concrete

CASING ▶ TYPE Schedule 40 PVC DIAMETER 3" LENGTH 20' HOLE DIA 8"

SCREEN ▶ TYPE Schedule 40 PVC SLOT .020" DIAMETER 3" LENGTH 20' TOTAL DEPTH 40'

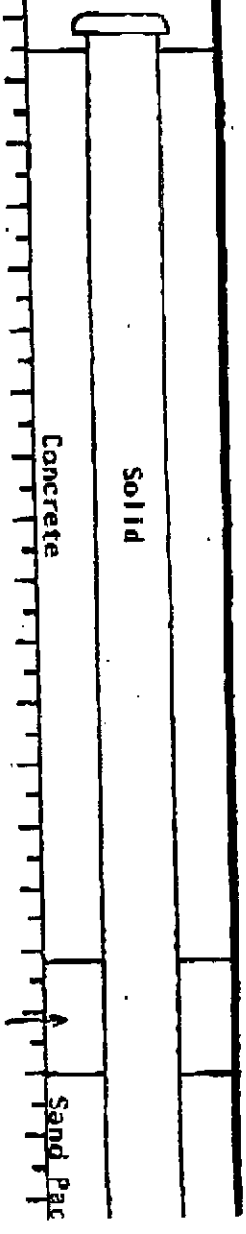
POSITIVE CONTENT	PLASTICITY	SAMPLE NO.	(ppm)	DEPTH	SAMPLE RECOVERY	PENETRATION RESISTANCE	LITHOLOGY / REMARKS
				0			Concrete
				1			(CL) olive-brown silty clay
				2			
				3			
Dp	M		ND	4		P	(minor sand; no odor)
				5			(gravelly at 5')
				6			
				7			
				8			
Dp	VD			9		8	(SC) dark yellowish-brown clayey sand; trace find gravel; no odor
			ND	10		25	
				1		45	
				2			
				3			
				4		15	
Dp	VD		38	5		30	(very silty, slight odor)
				6		50	
				7			
				8			
				9		5	

OWNER: SHELL OIL

ADDRESS: 10700 MAC ARTHUR BLVD. OAKLAND, CA.

(very fine grained; moderate to

WELL COMPLETION



PACIFIC ENVIRONMENTAL GROUP, INC. P70/5 2S/3W24.12 JOB NO. 100-22.01

SHELL OIL COMPANY -- WELL LOG

PAGE 2 OF 2

LOCATION MAP

) See page 1 for details.

WELL NUMBER ▶ S-1	LOCATION ▶ Oakland
DATE ▶	WEATHER ▶
LOGGED BY ▶	DRILLED BY ▶
DRILLING METHOD ▶	SAMPLING METHOD ▶
GRAVEL PACK ▶	SEAL ▶

ELEVATION ▶

CASING ▶ TYPE DIAMETER LENGTH HOLE DIA

SCREEN ▶ TYPE SLOT DIAMETER LENGTH TOTAL DEPTH

MOISTURE CONTENT	BEDDING	DENSITY	PLASTICITY	SAMPLE NO.	HNU (ppm)	DEPTH	SAMPLE	SEDIMENTARY STRUCTURES	PENETRATION RESISTANCE	LITHOLOGY / REMARKS
						20			15 25	(SC) continued
						1				
						2				(harder drilling)
						3				
Dr-Dp	PS	VD			ND	4			50	yellowish-brown silty sandstone; deeply weathered; fractured; trace clay; no odor
						5				
						6				
						7				
						8				
Dp		Hd			1	9			30 50	yellowish-brown claystone; no odor
						30				
						1				
						2				
						3				
						4			30	(very closely fractured; deeply weathered; no odor to very slight odor)
Dp		Hd			ND	5			50	
						6				
						7				
						8				38' dark grayish-brown silty sandstone; fractured
						9			50	

Total Depth = 40'

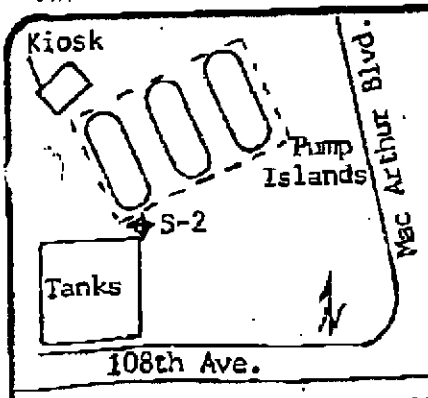
Sand Pack

Screens

52

25/3W25M3

PACIFIC ENVIRONMENTAL GROUP, INC. #8705 JOB NO. 100-22.01



SHELL OIL COMPANY -- WELL LOG

PAGE 1 OF 2

WELL NUMBER	S-2	LOCATION	Oakland
DATE	2/12/87	WEATHER	cool, rainy
LOGGED BY	DM	DRILLED BY	Bayland: Ed, Curt
DRILLING METHOD	HSA	SAMPLING METHOD	Cal. Mod.
GRAVEL PACK	CA	SEAL	bentonite & concrete

CASING ▶ TYPE Schedule 40 PVC DIAMETER 3" LENGTH 20' HOLE DIA 8"

SCREEN ▶ TYPE Schedule 40 PVC SLOT .020" DIAMETER 3" LENGTH 20' TOTAL DEPTH 40'

MOISTURE CONTENT	CONSIST	DENSITY	PLASTICITY	SAMPLE NO	HNu (PPM)	DEPTH	SAMPLE	RECOVERY	PENETRATION RESISTANCE	LITHOLOGY / REMARKS
						0				concrete
										(CL) gray silty clay; no odor
						1				
						2				
						3				
						4			P	(SM) dark yellowish-brown silty sand; very fine-grained; no odor
	WS				ND	5				
						6				
						7				
						8				
						9			11	(CL) dark yellowish-brown sandy clay; very silty; moderate odor
Dp		Hd	L		4.4	10			22 30	
						1				
						2				
						3				
						4			P	(CL-ML) dark grayish-brown silty clay to clayey silt; no odor
Dp		VSt	L		127	5				
						6				16'
						7				
						8				(SC) dark yellowish-brown clayey sand; some gravel; silty; very fine-grained; no odor
Dp	PS					9				

Concrete
Bentonite
Solid
Sand Pack

#6701S 2S/3W27M3

PACIFIC ENVIRONMENTAL GROUP, INC. JOB NO. 100-22.01

SHELL OIL COMPANY -- WELL LOG

PAGE 2 OF 2

LOCATION MAP

See page 1 for details.

WELL NUMBER ▶ S-2	LOCATION ▶ Oakland
DATE ▶	WEATHER ▶
LOGGED BY ▶	DRILLED BY ▶
DRILLING METHOD ▶	SAMPLING METHOD ▶
GRAVEL PACK ▶	SEAL ▶

ELEVATION ▶

CASING ▶ TYPE DIAMETER LENGTH HOLE DIA

SCREEN ▶ TYPE SLOT DIAMETER LENGTH TOTAL DEPTH

MOISTURE CONTENT	STAINING	ODORITY	PLASTICITY	SAMPLE NO.	PID/FID (ppm)	DEPTH	SAMPLE RECOVERY	PENETRATION RESISTANCE	LITHOLOGY / REMARKS	WELL COMPLETION
						20			(SC) continued	Sand Pack / Screens
						1				
						2				
						3				
						4		P		
Dp	P				152	5			dark yellowish brown to dark grayish-brown sandstone; fractured; weathered; no odor	
						6				
						7				
						8				
						9				
Dp	P	VD				30		P	(very closely fractured; very strong odor)	
						1	▽			
						2				
						3				
Wt		VD				4		P	(fractured; moderate odor)	
						5				
						6				
						7				
						8				
						9		P	(fractured; weathered; no odor)	

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II,III

Site ID # ____ Site Name USA Petroleum Today's Date 10/21/94

Site Address 10700 Mac Arthur

City Oakland Zip 94 Phone ____

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Business Plans, Acute Hazardous Materials
____ III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.A BUSINESS PLANS (Title 19)

___	1. Immediate Reporting	2703
___	2. Bus. Plan Stds.	25503(b)
___	3. RR Cars > 30 days	25503.7
___	4. Inventory Information	25504(a)
___	5. Inventory Complete	2730
___	6. Emergency Response	25504(b)
___	7. Training	25504(c)
___	8. Deficiency	25505(a)
___	9. Modification	25505(b)

II.B ACUTELY HAZ. MAT'LS

___	10. Registration Form Filed	25533(a)
___	11. Form Complete	25533(b)
___	12. RMPP Contents	25534(c)
___	13. Implement Sch. Req'd? (Y/N)	___
___	14. OffSite Conseq. Assess.	25524(c)
___	15. Probable Risk Assessment	25534(d)
___	16. Persons Responsible	25534(g)
___	17. Certification	25534(f)
___	18. Exemption Request? (Y/N)	25536(b)
___	19. Trade Secret Requested?	25538

III. UNDERGROUND TANKS (Title 23)

General

___	1. Permit Application	25284 (H&S)
___	2. Pipeline Leak Detection	25292 (H&S)
___	3. Records Maintenance	2712
___	4. Release Report	2651
___	5. Closure Plans	2670

Monitoring for Existing Tanks

___ 6. Method
1) Monthly Test
2) Daily Vadose
Semi-annual gndwater
One time soils
3) Daily Vadose
One time soils
Annual tank test
4) Monthly Gndwater
One time soils
5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon.
6) Daily Inventory
Annual tank testing
Cont pipe leak det
7) Weekly Tank Gauge
Annual tank tsting
8) Annual Tank Testing
Daily Inventory
9) Other ____

___	7. Precis Tank Test Date: ____	2643
___	8. Inventory Rec.	2644
___	9. Soil Testing.	2646
___	10. Ground Water.	2647

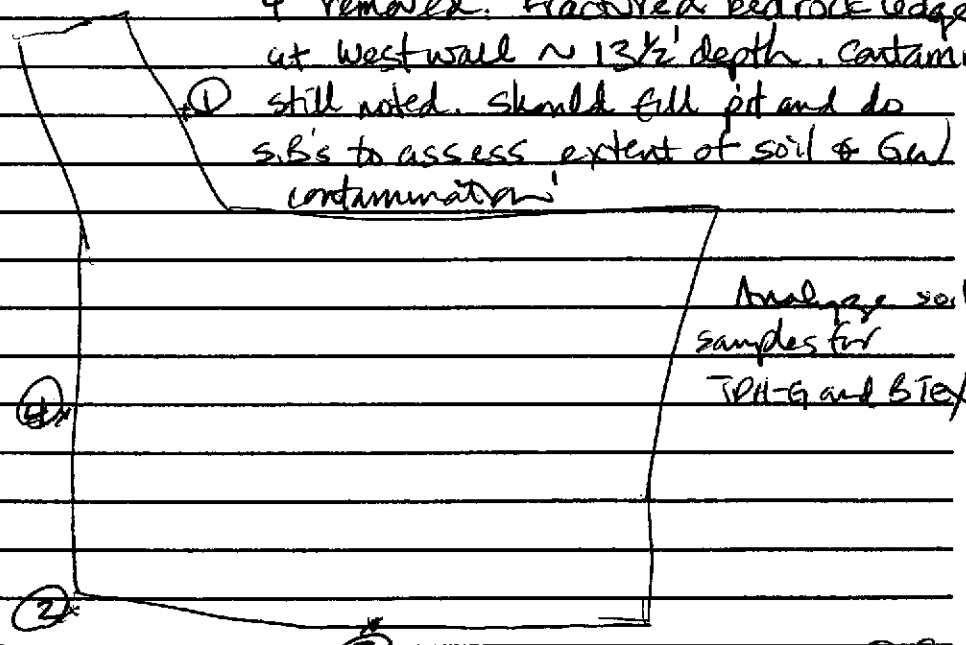
New Tanks

___	11. Monitor Plan	2632
___	12. Access. Secure	2634
___	13. Plans Submit Date: ____	2711
___	14. As Built Date: ____	2635

Rev 6/88

Comments:

Pit walls (south + west) had add'l 4' removed. Fractured bedrock ledge at West wall ~ 13½' depth. Contamination still noted. Should fill pit and do S.B.'s to assess extent of soil & Gw contamination.



Analyze soil samples for TPH-G and BTEX

① Sand with silt at 12' strong odor Analyze ① for TPH-G, TPH-D, BTEX
② stained sand at 13' strong odor
③ stained sand silt at 13' strong odor
④ stained silty sand at 13' strong odor.

II, III

Contact: ____

Title: ____ Inspector: ____

Signature: ____ Signature: ____

11:15 - 2:15 - 235
87.6 - 96.2 - 103.8

Pg 1

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II,III

Site ID # ____ Site Name USA Petroleum Today's Date 9/27/94

Site Address 10700 MacArthur

City Oakland Zip 94 Phone ________

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Business Plans, Acute Hazardous Materials
____ III. Underground Tanks Overexcavation

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.A BUSINESS PLANS (Title 19)

___	1. Immediate Reporting	2703
___	2. Bus. Plan Stds.	25503(b)
___	3. RR Cars > 30 days	25503.7
___	4. Inventory Information	25504(a)
___	5. Inventory Complete	2730
___	6. Emergency Response	25504(b)
___	7. Training	25504(c)
___	8. Deficiency	25505(a)
___	9. Modification	25505(b)

II.B ACUTELY HAZ. MAT'LS

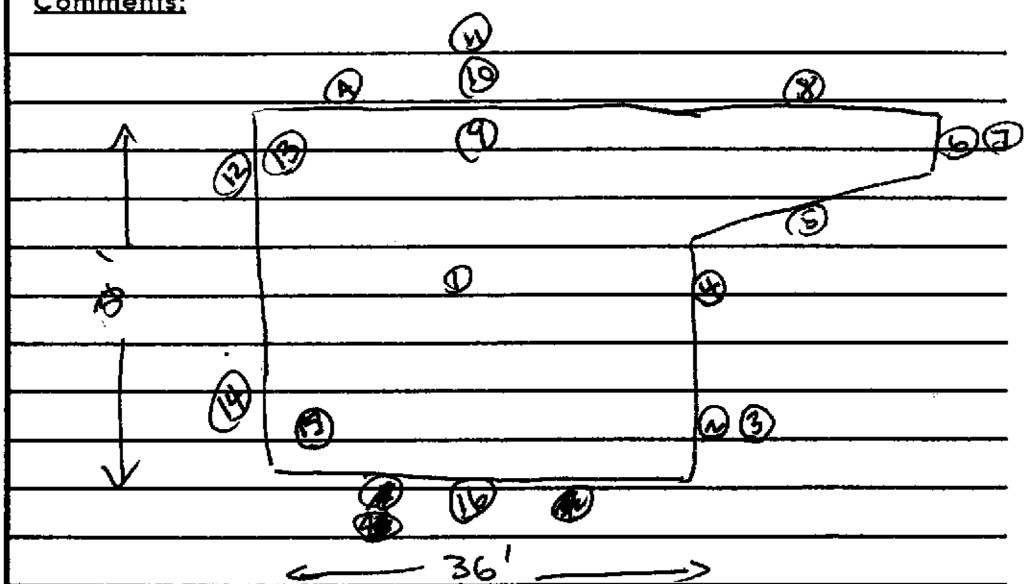
___	10. Registration Form Filed	25533(a)
___	11. Form Complete	25533(b)
___	12. RMPP Contents	25534(c)
___	13. Implement Sch. Req'd? (Y/N)	___
___	14. OffSite Conseq. Assess.	25524(c)
___	15. Probable Risk Assessment	25534(d)
___	16. Persons Responsible	25534(g)
___	17. Certification	25534(f)
___	18. Exemption Request? (Y/N)	25536(b)
___	19. Trade Secret Requested?	25538

III. UNDERGROUND TANKS (Title 23)

General	___	1. Permit Application	25284 (H&S)
	___	2. Pipeline Leak Detection	25292 (H&S)
	___	3. Records Maintenance	2712
	___	4. Release Report	2651
	___	5. Closure Plans	2670
Monitoring for Existing Tanks	___	6. Method 1) Monthly Test 2) Daily Vadose Semi-annual gndwater One time soils 3) Daily Vadose One time soils Annual tank test 4) Monthly Gndwater One time soils 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon. 6) Daily Inventory Annual tank testing Cont pipe leak det 7) Weekly Tank Gauge Annual tank tstng 8) Annual Tank Testing Daily Inventory 9) Other ________	
	___	7. Precis Tank Test Date: ________	2643
	___	8. Inventory Rec.	2644
	___	9. Soil Testing.	2646
	___	10. Ground Water.	2647
New Tanks	___	11. Monitor Plan	2632
	___	12. Access. Secure	2634
	___	13. Plans Submit Date: ________	2711
	___	14. As Built Date: ________	2635

Rev 8/88

Comments:



① Pit bottom at 17' stained silty clay - sl. degraded HC odor
② sidewall at 13.5' clay - no odor same staining
③ sidewall/base at 16' - no odor, sl staining
④ sidewall at 13' brown silty clay - no odor.
⑤ sidewall at 12' stained sl-mod odor.
⑥ sidewall at 12' stained - strong diesel odor
⑦ sidewall 3' in from ⑥ at 10' stained sl-mod odor
⑧ sidewall at 12' - sl. stain. sl. odor

II, III

Contact: ________________

Title: Geologist

Signature: [signature]

Inspector: [signature]

Signature: [signature]

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II,III

Site ID # ____ Site Name USA Petroleum Today's Date 9/27/94

Site Address 10700 MacArthur

City Oakland Zip 94 Phone ____

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Business Plans, Acute Hazardous Materials
____ III. Underground Tanks Overall .

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.A BUSINESS PLANS (Title 19)

___	1. Immediate Reporting	2703
___	2. Bus. Plan Stds.	25503(b)
___	3. RR Cars > 30 days	25503.7
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___	6. Emergency Response	25504(b)
___	7. Training	25504(c)
___	8. Deficiency	25505(a)
___	9. Modification	25505(b)

II.B ACUTELY HAZ. MAT'LS

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___	11. Form Complete	25533(b)
___	12. RMPP Contents	25534(c)
___	13. Implement Sch. Req'd? (Y/N)	___
___	14. OffSite Conseq. Assess.	25524(c)
___	15. Probable Risk Assessment	25534(d)
___	16. Persons Responsible	25534(g)
___	17. Certification	25534(f)
___	18. Exemption Request? (Y/N)	25536(b)
___	19. Trade Secret Requested?	25538

III. UNDERGROUND TANKS (Title 23)

General

___	1. Permit Application	25284 (H&S)
___	2. Pipeline Leak Detection	25292 (H&S)
___	3. Records Maintenance	2712
___	4. Release Report	2651
___	5. Closure Plans	2670

Monitoring for Existing Tanks

___ 6. Method
1) Monthly Test
2) Daily Vadose
Semi-annual gndwater
One time soils
3) Daily Vadose
One time soils
Annual tank test
4) Monthly Gndwater
One time soils
5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon.
6) Daily Inventory
Annual tank testing
Cont pipe leak det
7) Weekly Tank Gauge
Annual tank tsting
8) Annual Tank Testing
Daily Inventory
9) Other ____

___	7. Precis Tank Test Date: ____	2643
___	8. Inventory Rec.	2644
___	9. Soil Testing.	2646
___	10. Ground Water.	2647

New Tanks

___	11. Monitor Plan	2632
___	12. Access. Secure	2634
___	13. Plans Submit Date: ____	2711
___	14. As Built Date: ____	2635

Rev 6/88

Comments:

(9) Pit bottom ~ 19' rocks, silty clay - mod odor
(10) Sidewall ~ 12' strong odor. stained silty clay
(11) sidewall ~ 12' in 2' from (10) mod-str odor
(A) sidewall ~ 12' - same characteristics as (11) - did not collect sample - Contamination left in west wall from ~8-12' depth.
(12) silty clay, sidewall ~ 12' depth - mod odor.
(13) Pit bottom ~ 19-20' - mod odor
(14) sidewall ~ 11' mod odor.
(15) bottom pit ~ 17' - sl. odor
(16) sidewall ~ 14' - no odor

Analyze 5, 7, & 8 for TPH-G, TPH-D and BTEX
" all others for TPH-G and BTEX.

II, III

Contact: ____

Title: ____ Inspector: Estudy

Signature: ____ Signature: [signature]

USA GASOLINE CORPORATION
30101 Agoura Court, Ste. 200, Agoura Hills, CA 91301-4311
(818) 865-9200 FAX (818) 865-0092

September 22, 1994

Mr. Hugh Phares
JAY-PHARES CORPORATION
10700 MacArthur Blvd.
Suite 200, Oakland, CA 94605-5260

RE: Former USA Gasoline Station #57
10700 MacArthur Blvd.
Oakland, California

Dear Mr. Phares:

Please find enclosed, a copy of the Preliminary Site Assessment Work Plan. This work plan was prepared by Alton GeoScience for USA Gasoline Corporation ("USA"). USA will implement the work plan upon receiving approval from the Alameda County Health Department.

If you have any questions please call me at (818) 865-9200 ext 214.

Thank you.

sincerely,

Srikanth Dasappa
Environmental Engineer.

JAY- PHARES CORPORATION

Commercial Real Estate Development
Telephone: (510) 562-9500
FAX: (510) 562-9505

ADVANCE COPY BY FAX TO: 1-818-865-0092

August 17, 1994

Lyle J. Schlyer, Esq.
General Counsel
USA Petroleum Corporation
30101 Agoura Court
Suite 200
Agoura Hills, CA 91301-4311

RE: Tank Leak Contamination - **STID # 4490**
USA Station #57
Foothill Square Shopping Center
10700 MacArthur Blvd., Oakland, California

Dear Mr. Schlyer:

Enclosed are:

1. Copy of a July 25, 1994 letter from Lisa N. Vela of Augeas Corporation, the owner's environmental consultant, together with enclosures.

2. Copy of a July 20, 1994 "Notice of Requirement to Reimburse" directed to Drake Builders, to Jay-Phares Corporation and to Michael Geary, Division Manager of USA Petroleum Corp.

The tanks were pulled on July 19, 1994 by USA's contractor, and floating product was noted in the excavation pit. The enclosures to the Augeas letter include results of tests taken on July 19, which indicate high levels of contamination from petroleum hydrocarbons, including benzene.

Jay-Phares Corporation is attempting to close on the multi-million dollar purchase of Foothill Square Shopping Center, and that closing is now delayed pending the clean-up of the contamination caused by the leaking USA tanks. Environmental consultants advise us that tight clay soils here preclude vapor extraction as a viable remediation approach. Furthermore, our plans envision construction of a 30,000 s.f. building on top of this site.

Augeas' letter states, at page 4, that **"Immediate abatement measures should be implemented as required under federal and state regulations. A subsurface investigation to determine the vertical and lateral extent of contamination should be performed promptly in order to develop remedial action plans."**

If the USA contamination is not promptly removed by USA in a manner acceptable to the agencies and our lender, then the owner and/or Jay-Phares Corporation will be forced to conduct the remediation and seek reimbursement from USA of all costs thus incurred.

By telephone today, Eva Chu (1-510-567-6762/voice; 1-510-337-9335/fax), Hazardous Materials Specialist with the Alameda County Health Care Services Agency, has informed us that USA has submitted, and she has now approved, a proposal to begin exploratory soil excavation during the next few days. We are pleased to hear of this step, and believe we can allocate an area for soils aeration immediately adjacent to the excavation area. Please phone John Jay of this office to coordinate. However, Eva Chu advises that she still is awaiting from USA the tank logs and the logs for the two monitoring wells installed by Shell several years ago at this station.

Please provide us with a copy of the proposal for subsurface investigation which has been approved by Eva Chu, so we can coordinate to provide appropriate space for soils aeration. Please also notify us at least two (2) business days before the excavation work begins, so that we can have our representatives present. Notice should be given to Jay-Phares Corporation and to:

Eva Chu, Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway
Alameda, CA 94502
(510) 567-6762
(510) 337-9335 (Fax)

Augeas Corporation
780 Purissima Street
Half Moon Bay, CA 94019
Attn: Rosanna Garrison
(415) 726-7700
(415) 726-1217 (Fax)

Thank you for your cooperation in this matter.

Very truly yours,

Hugh K. Phares, III

HKP/ag

cc: Eva Chu - Alameda County Health Care Services Agency
Michael Geary, Division Manager - USA
Sirikanth Dasappa, Environmental Engineer - USA
G.S. Garrison, Esq.
R. Garrison
R. Gilcrease
J. Jay

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# ______ Site Name USA Petroleum Today's Date 8/19/94

Site Address 10700 MacArthur EPA ID# ______

City Oakland Zip 94 Phone ______

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? ______

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
✓ III. Underground Tanks Overex.

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A GENERATOR (Title 22)

	Item	Code
	1. Waste ID	* 66471
	2. EPA ID	66472
	3. > 90 days	66508
	4. Label dates	66508
	5. Biennial	66493
Manifest	6. Records	66492
Manifest	7. Correct	66484
Manifest	8. Copy sent	66492
Manifest	9. Exception	66484
Manifest	10. Copies Rec'd	66492
Misc.	11. Treatment	66371
Misc.	12. On-site Disp. (H.S.&C.)	26189.5
Misc.	13. Ex Haz. Waste	66570
Prevention	14. Communications	67121
Prevention	15. Aisle Space	67124
Prevention	16. Local Authority	67126
Prevention	17. Maintenance	67120
Prevention	18. Training	67105
Contingency	19. Prepared	67140
Contingency	20. Name List	67141
Contingency	21. Copies	67141
Contingency	22. Emg. Coord. Trng.	67144
Containers, Tanks	23. Condition	67241
Containers, Tanks	24. Compatibility	67242
Containers, Tanks	25. Maintenance	67243
Containers, Tanks	26. Inspection	67244
Containers, Tanks	27. Buffer Zone	67246
Containers, Tanks	28. Tank Inspection	67259
Containers, Tanks	29. Containment	67245
Containers, Tanks	30. Safe Storage	67261
Containers, Tanks	31. Freeboard	67257

I.B TRANSPORTER (Title 22)

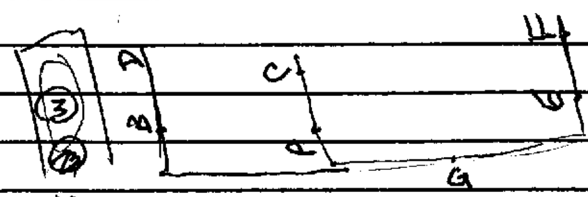
	Item	Code
	32. Applic./Insurance	66428
	33. Comp. Cert./CHP Insp.	66448
	34. Containers	66465
Manifest	35. Vehicles	66465
Manifest	36. EPA ID #s	66531
Manifest	37. Correct	66541
Manifest	38. HW Delivery	66543
Manifest	39. Records	66544
Cont'rs	40. Name/ Covers	66545
Cont'rs	41. Recyclables	66800

Rev 6/88

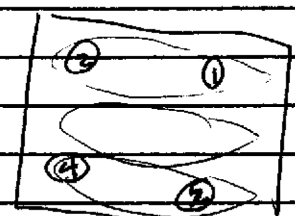
Comments:

Perimeter of pit NOT overexcavated - only overexcavated add'l 2-4' depth

soil contamination in gasoline pit to 17-19' depth
sidewalls contaminated at 10-12' depth



Foothill



① at 16' sl to no odor
② at 17' - mod odor
③ Middle of diesel pit at 15½' - sl. odor

④ at 17' mod odor - rocks, clay + gravel (¼")
⑤ at 18' mod odor - aged fuel; gravelly clay

A - under dispenser, silty clay at 3½' mod odor
B - " " " " " mod odor
C " " clay 3' sl-mod odor
D " " sandy clay 3' sl odor
E " " silty clay 3' mod odor
F " " silty clay 2½' mod odor
G over exc. of pipeline - contaminated sand layer at 3'6" - 6'6".
sample in clay 9' depth - sl odor

J. Madison, V. Bennett, L. Sw... (Inspectors)

Contact: ______
Title: ______ Inspector: ______
Signature: ______ Signature: [signature]

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StID 4490

August 16, 1994

Mr. Vern Bennett
Western Geo-Engineers
1386 East Beamer St
Woodland, CA 95776-6003

RE: Workplan Approval for 10700 MacArthur Blvd, Oakland 94605

Dear Mr. Bennett:

I have completed review of Western Geo-Engineers' August 1994 Limited Overexcavation proposal for the above referenced site. The proposal to overexcavate and sample the perimeter and base of the tank pit, and to collect soil samples from the dispenser islands is acceptable. Field work should commence by **October 5, 1994.**

Soil analysis of PI-2, along the product line, exhibited elevated levels of petroleum hydrocarbons (4,500 ppm TPH-G, and 440 ppm xylenes). This area should also be overexcavated at that time.

Please notify this office at least 72 hours prior to the start of field work. A representative from this office must be present to witness the sampling. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Srikanth Dasappa, USA Gasoline, 30101 Agoura Ct, Suite 200, Agoura Hills, CA 91301
Jay Phares Corp, 10700 MacArthur, Suite 200, Oakland 94605
files

Convs. w/ V. Bennett - other consultant wants split sample - DO! not for BTEX.

usapetro.1

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name USA Petroleum Today's Date 7/19/94

Site Address 10700 MacArthur EPA ID# _____

City Oakland Zip 94605 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? _____

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
X III. Underground Tanks Removal

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A GENERATOR (Title 22)

	1. Waste ID	* 66471
	2. EPA ID	66472
	3. > 90 days	66508
	4. Label dates	66508
	5. Biennial	66493
Manifest	6. Records	66492
	7. Correct	66484
	8. Copy sent	66492
	9. Exception	66484
	10. Copies Rec'd	66492
Misc.	11. Treatment	66371
	12. On-site Disp. (H.S.&C.)	26189.5
	13. Ex Haz. Waste	66570
Prevention	14. Communications	67121
	15. Aisle Space	67124
	16. Local Authority	67126
	17. Maintenance	67120
	18. Training	67105
Contin. gency	19. Prepared	67140
	20. Name List	67141
	21. Copies	67141
	22. Emg. Coord. Tmg.	67144
Containers, Tanks	23. Condition	67241
	24. Compatibility	67242
	25. Maintenance	67243
	26. Inspection	67244
	27. Buffer Zone	67246
	28. Tank Inspection	67259
	29. Containment	67245
	30. Safe Storage	67261
	31. Freeboard	67257

I.B TRANSPORTER (Title 22)

	32. Applic./Insurance	66428
	33. Comp. Cert./CHP Insp.	66448
	34. Containers	66465
Manifest	35. Vehicles	66465
	36. EPA ID #s	66531
	37. Correct	66541
	38. HW Delivery	66543
	39. Records	66544
Cont'rs	40. Name/ Covers	66545
	41. Recyclables	66800

Rev 6/88

Comments:

Diesel tank sampling - at 12' bgs
North end - stained - obvious leak or overfill occurred
silty clay soil - (Fill end of tank)
South end - stained - silty clay - mod odor

Gasoline Pit Sampling
Tank 3 - West end - silty sand - stained w/ mod odor
- east end silty sand - less stain w/ sl odor

Tank 2 - West end - silty sand - stained w/ mod odor
east end - silty clay - less stain - sl. odor.

Tank 1 - west end - silty sand - less stain but strong odor
east end - silty sand - stained - strong odor

Analyze gasoline pit samples for TPH-G, BTEX + total lead

Analyze diesel pit for TPH-D, BTEX and PNAs

Contact: _____
Title: Project Geologist Inspector: Ron Chu
Signature: _____ Signature: _____

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

I

Site ID# ______ Site Name USA Petroleum Today's Date 7/19/94

Site Address 10700 MacArthur EPA ID# ______

City Oakland Zip 94605 Phone ______

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? ______

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
___ III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

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	Item	Code
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Prevention	___ 14. Communications	67121
	___ 15. Aisle Space	67124
	___ 16. Local Authority	67126
	___ 17. Maintenance	67120
	___ 18. Training	67105
Contingency	___ 19. Prepared	67140
	___ 20. Name List	67141
	___ 21. Copies	67141
	___ 22. Emg. Coord. Trng.	67144
Containers, Tanks	___ 23. Condition	67241
	___ 24. Compatibility	67242
	___ 25. Maintenance	67243
	___ 26. Inspection	67244
	___ 27. Buffer Zone	67246
	___ 28. Tank Inspection	67259
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	___ 30. Safe Storage	67261
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	Item	Code
	___ 32. Applic./Insurance	66428
	___ 33. Comp. Cert./CHP Insp.	66448
	___ 34. Containers	66465
Manifest	___ 35. Vehicles	66465
	___ 36. EPA ID #s	66531
	___ 37. Correct	66541
	___ 38. HW Delivery	66543
	___ 39. Records	66544
Cont'rs	___ 40. Name/ Covers	66545
	___ 41. Recyclables	66800

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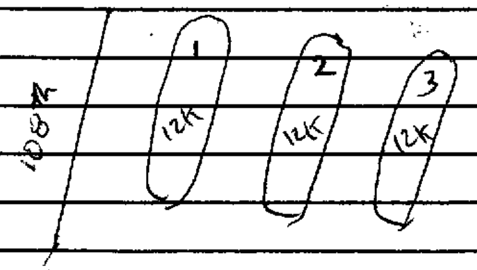
Comments: ⟷> NORTH



(8K 4) LEL 0% O2-19%

Perched water in pit

DTW in MW ~ 16-18'

Floating product in pit - Strong odor from pit

Tank 1 2% LEL 8 O2 Bottom of tanks at [illegible]

Tank 2 20% LEL 3% O2

Tank 3 15% O2 5% LEL

Tank 2 - 12K UST - some corrosion. Hole noted at fill end - bottom of tank - It was leaking water when pulled from pit. Bare steel tank - Hauled by H+H.

Tank 3 - 12K UST some corrosion but no obvious through holes - repair or spot welding on ends of UST Bare steel

Tank 1 - 12K UST - some corrosion - 1/2" hole on bottom end seam

Tank 4 - 8K diesel UST. Tar wrapped mostly intact - No holes observed w/ tar wrap around it.

I

Contact: ______

Title: Project Geologist

Signature: [signature]

Inspector: Eva Chu

Signature: [signature]

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name USA Petroleum Today's Date 7/19/94

Site Address 16700 MacArthur Blvd EPA ID# _____

City Oakland Zip 94605 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? _____

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
X III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

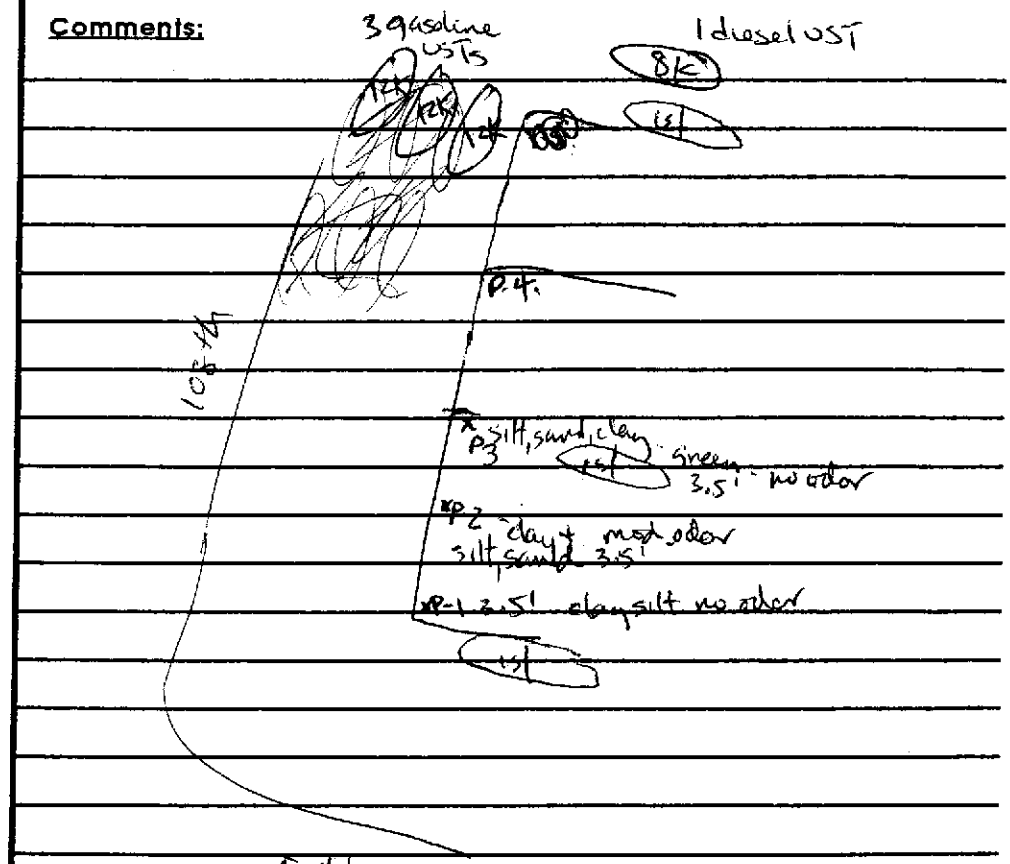
I.A GENERATOR (Title 22)

	1. Waste ID	* 66471
	2. EPA ID	66472
	3. > 90 days	66508
	4. Label dates	66508
	5. Biennial	66493
Manifest	6. Records	66492
	7. Correct	66484
	8. Copy sent	66492
	9. Exception	66484
	10. Copies Rec'd	66492
Misc.	11. Treatment	66371
	12. On-site Disp. (H.S.&C.)	26189.5
	13. Ex Haz. Waste	66570
Prevention	14. Communications	67121
	15. Aisle Space	67124
	16. Local Authority	67126
	17. Maintenance	67120
	18. Training	67105
Contin. gency	19. Prepared	67140
	20. Name List	67141
	21. Copies	67141
	22. Emg. Coord. Trng.	67144
Containers, Tanks	23. Condition	67241
	24. Compatibility	67242
	25. Maintenance	67243
	26. Inspection	67244
	27. Buffer Zone	67246
	28. Tank Inspection	67259
	29. Containment	67245
	30. Safe Storage	67261
	31. Freeboard	67257

I.B TRANSPORTER (Title 22)

	32. Applic./Insurance	66428
	33. Comp. Cert./CHP Insp.	66448
	34. Containers	66465
Manifest	35. Vehicles	66465
	36. EPA ID #s	66531
	37. Correct	66541
	38. HW Delivery	66543
	39. Records	66544
Con'rs	40. Name/ Covers	66545
	41. Recyclables	66800

Comments:



Also sample beneath dispenser #s

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Contact: _____

Title: Project Geologist Inspector: _____

Signature: Jan Barr Signature: _____

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 415/271-4320

Project Specialist (print) Juliet Shin Juliet Shin 7/12/94

You are required to comply w/ all items specified in this plan including the additional comments in red ink

UNDERGROUND TANK CLOSURE PLAN

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

1. **Business Name** U.S.A. Petroleum

   Business Owner U.S.A. Petroleum

2. **Site Address** 10700 McArthur Blvd.

   City Oakland **Zip** 94605 **Phone** n/a

3. **Mailing Address** 1261 E. 9th Street

   City Pomona, CA **Zip** 91766 **Phone** (909) 622-3424

4. **Land Owner** U.S.A. Petroleum

   Address 1261 E. 9th St. **City, State** Pomona, CA **Zip** 91766

5. **Generator name under which tank will be manifested**

   U.S.A. Petroleum

   EPA I.D. No. under which tank will be manifested CAC001005120

rev 12/90

6. Contractor Pacific Excavators

Address P.O. Box 968

City Alamo,CA Phone 370-8783

License Type A ID# 605513

7. Consultant N/A

Address

City Phone

8. Contact Person for Investigation

Name Joe Madison Title Contractor

Phone (510)370-8783

9. Number of tanks being closed under this plan 4

Length of piping being removed under this plan 400

Total number of tanks at facility 4

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

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

a) Product/Residual Sludge/Rinsate Transporter

Name H&H Shipping & Transportation EPA I.D. No. CAD004771168

Hauler License No. GF036-017353 License Exp. Date

Address 220 China Basin

City San Francisco, CA State CA Zip 94107

b) Product/Residual Sludge/Rinsate Disposal Site

Name H&H Shipping EPA I.D. No. CAD004771168

Address 220 China Basin

City San Francisco State CA Zip 94107

c) Tank and Piping Transporter

Name H&H Shipping EPA I.D. No. CAD004771168

Hauler License No. GFQ36-017353 License Exp. Date _____

Address 220 China Basin

City San Francisco, State CA Zip 94107

d) Tank and Piping Disposal Site

Name H&H Shipping EPA I.D. No. CAD004771168

Address 220 China Basin

City San Francisco State CA Zip 94107

11. Experienced Sample Collector

Name ~~Srikanth Pasappa~~ 7/19/94 spoke w/ Paul Studemeister - CEG - Don't know about job

Company ~~U.S.A. Petroleum~~ The Bentley Co. (408) 434-1622

Address ~~1261 E. 9th Street,~~ 2149 O'Toole Ave, Ste L, San Jose, CA 95131

City Pomona State CA Zip 91766 Phone ~~(909)~~ 622-3424

12. Laboratory

Name Anlab

Address 1910 South Street

City Sacramento State CA Zip 95814

State Certification No. 1468

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

If yes, describe. _____

14. Describe methods to be used for rendering tank inert

Dry Ice 15 lbs per 1000-gallons

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
(3) 12,000 gallon gasoline	Install date not available Last used 1994	Soil A min. of	1' below tank 3 samples per tank, one from each end of tank & one from below tank. (Refer to Tri-Valley Reg. Guidelines)
(1) 8,000 gallon diesel	Install date not available Last used in 1994	Soil A min. of	1' below tank 2 samples per tank

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any groun water be present in the excavation.

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	**Sampling Plan**
200 cubic yards	composite 1 sample per 50 cubic yards, only if plans to dispose of off site - If plans to reuse soil on site, then 1 sample per every 20 cubic yards. 4 discreet

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. **Chemical methods and associated detection limits to be used for analyzing samples**

    The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
Gasoline	TPH G BTEX 5030 , 8015 & Lead	TPHg & TPHd H_2O : 50ppb Soil : 1ppm	BTEX ~~.010~~ 0.5ppb 0.005 to 0.5ppm
Diesel	TPH-D 3510-3550 , 8015		~~.010~~

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer n/a

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. **Report any leaks or contamination to this office within 5 days of discovery.** The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information liste in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Healt Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibilit of the property owner or his agent and that this responsibility is no shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) Joe Madison

Signature Joe Madison

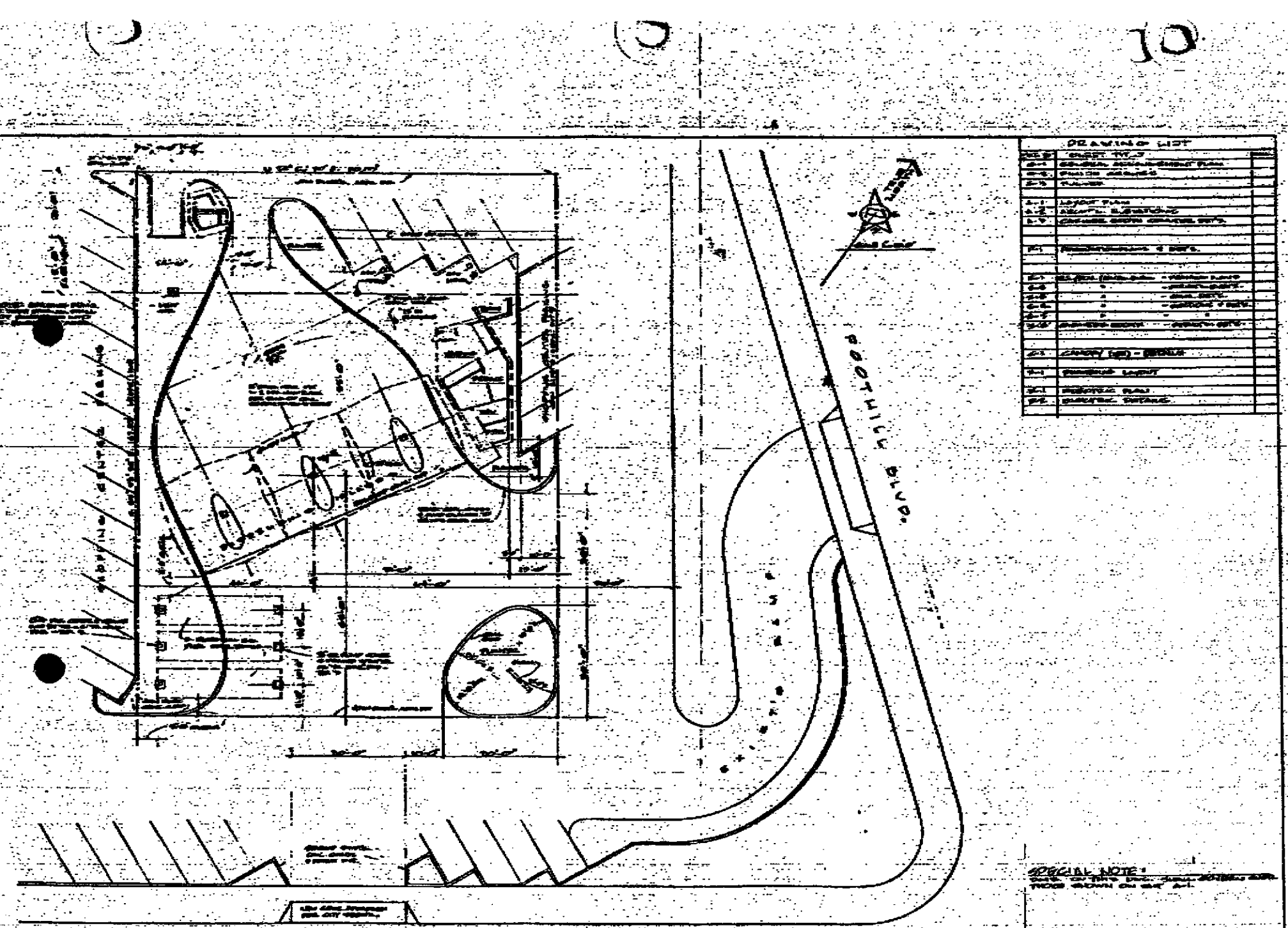
Date 5/27/94

Signature of Site Owner or Operator

Name (please type) U.S.A. Petroleum

Signature Joe Madison

Date 5/27/94



DRAWING LIST

SHEET NO.	SHEET TITLE	
G-1		
G-2		
G-3		
A-1	LAYOUT PLAN	
A-2		
A-3		
P-1		
E-1		
E-2		
E-3		
E-4		
E-5		
L-1		
M-1		
P-1		

SPECIAL NOTE:

CLYDE CARPENTER & ASSOCIATES

GENERAL ARRANGEMENT PLAN

G-1

57

12-15-92

Mr. Brian Oliva
Alameda Co. Dept of Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

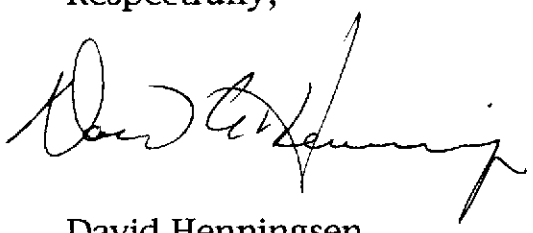
David Henningsen
D.I. Chadbourne, Inc.
999 Almanor Ln. #5
Lafayette, CA 94549
510-284-9256

Re: UST Upgrade Permit Application

Dear Mr. Oliva,

Here is the permit application for the proposed tank upgrade at:
Olympic Gas 10700 MacArhtur Blvd., Oakland.
Included with the application package is a check for the modification fee of $906. If you have any questions please call me at the above listed phone number. Thank you.

Respectfully,



David Henningsen
Operations Manager

OLYMPIC GAS

	1.	Provide A+B+C permit forms
	2.	" an accurate and complete as built plot plan
	3.	" a written spill response plan
	4.	" " tank monitoring plan
	5.	" results of precision tank tests (initial + annual)
	6.	" " " pipeline leak detector tests (initial + annual)
2661c2	7.	" results of vacuum tank test
2661h	8.	" certification by independent testing organization
2661i	9.	" better details on repairs of leaks
2662b2	10.	provide H + S safety plan 29CFR 1910.120
	11.	" 3 sets of scaled blue prints
	12.	" copies of haz. waste contractors license
	13.	" copies of 40 hr. OSHA training of employees
	14.	" copy of worker's compensation certificate

check with Craig Mayfield of Zone 7 (484-2600) on cathodic wells