

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

July 10, 2006

Reed Rinehart
Rinehart Oil, Inc.
2401 North State Street
Ukiah, CA 95482

Subject: Fuel Leak Case No. RO0000234, Rino Pacific/Oakland Truck Stop, 1107 5th Street, Oakland, CA

Dear Mr. Rinehart:

Alameda County Environmental Health (ACEH) staff has received a hard copy of a report entitled, "Quarterly Report – First Quarter 2006," for the above-referenced site dated June 8, 2006, prepared on your behalf by Advanced GeoEnvironmental, Inc. This report was received by ACEH on June 14, 2006. Please note that effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Hard copies of reports are no longer accepted. **Therefore, please upload the "Quarterly Report – First Quarter 2006," dated June 8, 2006, and all future reports to the Alameda County FTP site as outlined in the following discussion of "Electronic Submittal of Reports," and the enclosed, "Electronic Report Upload (ftp) Instructions."**

ELECTRONIC SUBMITTAL OF REPORTS

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

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

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

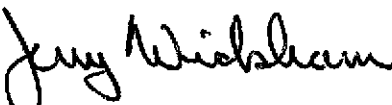
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Reed Rinehart
July 10, 2006
Page 3

cc: Jo'l Chapman
Advanced GeoEnvironmental, Inc.
837 Shaw Road
Stockton, CA 95215

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

1) Obtain User Name and Password:

- a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of: **ftp Site Coordinator**.
- b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**

2) Upload Files to the ftp Site

- a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
- b) Click on File, then on Login As.
- c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
- d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
- e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs

- a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
- b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
- c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
06-02-06

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

June 1, 2006

Reed Rinehart
Rinehart Oil, Inc.
2401 North State Street
Ukiah, CA 95482

Subject: Fuel Leak Case No. RO0000234, Rino Pacific/Oakland Truck Stop, 1107 5th Street, Oakland, CA

Dear Mr. Rinehart:

Alameda County Environmental Health (ACEH) staff previously requested in correspondence dated October 26, 2005 (attached) that you complete the soil and groundwater investigation that was proposed in a Work Plan dated September 29, 2005. Results of the soil and groundwater investigation were to have been submitted to ACEH by March 15, 2006. To date, we have not received a Soil and Groundwater Investigation Report or a request for a schedule extension.

Your Soil and Groundwater Investigation Report is late, and your fuel leak site is not in compliance with ACEH directives. In order for your site to return to compliance, please submit the previously requested Soil and Groundwater Investigation Report by July 6, 2006. This date is not an extension of your due date, reports for this site are late and your site is out of compliance. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10, 23 CCR sections 2652 through 2654, and 2721 through 2728 outline the duties of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

If it appears as though significant delays are occurring, or reports are not submitted as requested, we will consider referring your case to the County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation. Please note that further delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive cost reimbursement from the State's Underground Storage Tank Cleanup Fund.

Please submit the requested, "Soil and Groundwater Investigation Report," in electronic form as described below.

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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.

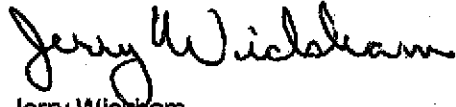
AGENCY OVERSIGHT

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Reed Rinehart
June 1, 2006
Page 3

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Attachment: ACEH Correspondence Dated October 26, 2005

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass
SWRCB Cleanup Fund
1001 I Street, 17th floor
Sacramento, CA 95814-2828

Shari Knierem
SWRCB Cleanup Fund
1001 I Street, 17th floor
Sacramento, CA 95814-2828

Jo'l Chapman
Advanced GeoEnvironmental, Inc.
837 Shaw Road
Stockton, CA 95215

Donna Drogos, ACEH
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7

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 260
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

October 26, 2005

Reed Rinehart
Rinehart Oil, Inc.
2401 North State Street
Ukiah, CA 95482

Subject: Fuel Leak Case N [REDACTED] Rino Pacific/Oakland Truck Stop, 1107 5th Street,
Oakland, CA

Dear Mr. Rinehart:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the reports entitled, "Additional Site Assessment Work Plan," dated September 29, 2005, and "Interim Remediation System Report," also dated September 29, 2005. Both reports were prepared on behalf of Rinehart Oil, Inc. by Advanced GeoEnvironmental, Inc. The Work Plan presents plans to advance nine additional borings and install one groundwater monitoring well. The Interim Remediation System Report describes the installation of an ozone sparge system including 10 sparge wells. Initiation of the ozone sparge system was apparently delayed due to demolition activities at the site.

ACEH concurs with the proposed scope of work provided the technical comments included below are addressed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@accgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Interim Remediation System.** Please initiate operation of the interim remediation system utilizing ozone sparging and provide information on the start-up operation and monitoring of this system in the Interim Remediation System Report requested below.
2. **Soil Boring Logs.** The Work Plan indicates that soils will be sampled at discrete 5-foot intervals. ACEH requests that soils be continuously sampled and logged to adequately describe the encountered soils. Please present the soil boring logs in the Subsurface Investigation Report requested below.
3. **Soil Analyses.** The Work Plan indicates that selected soil samples will be analyzed but does not define whether screening criteria will be applied in selecting soil samples for laboratory analyses. ACEH requests that soil samples be submitted for laboratory analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. In addition, one soil sample collected

approximately two feet below the interval of observed staining, odor, or elevated PID readings should be submitted for laboratory analysis. One soil sample collected from the capillary fringe is to be submitted for laboratory analyses from each soil boring. If no staining, odor, or elevated PID readings are observed, please submit soil samples from minimum five-foot intervals for laboratory analyses. Please present the results in the Subsurface Investigation Report requested below.

4. **Grab Groundwater Samples.** The Work Plan proposes the collection of grab groundwater samples with a HydroPunch sampling device near the top of the groundwater table and the total depth of selected borings. Criteria for selecting borings are not defined in the Work Plan. ACEH concurs that grab groundwater samples are to be collected within 5 feet of the water table from each soil boring. ACEH requests that grab groundwater samples also be collected from intervals more than 5 feet below the water table in all of the proposed borings. Soils are to be continuously sampled and logged as discussed in technical comment 2 above. The soil boring logs are to be used to target coarse-grained layers below the water table for depth-discrete groundwater sampling. Each coarse-grained layer that may represent a significant contaminant migration pathway is to be targeted for depth-discrete groundwater sampling. Depth-discrete groundwater samples are to be collected in a boring(s) adjacent to the logged soil boring using techniques that will prevent cross-contamination of separate water-bearing zones and contamination of the depth-discrete groundwater sample by contaminated groundwater from a shallower interval. Please present the results in the Subsurface Investigation Report requested below.
5. **Monitoring Well Installation.** One monitoring well is proposed in 5th Street, northwest of the site. ACEH requests that an additional monitoring well be installed on the north side of 5th Street and east of existing well MW-13 in order to provide groundwater monitoring data northeast of the site. The screen intervals for these proposed monitoring wells are to be no greater than 10 feet in length. Please present the results in the Subsurface Investigation Report requested below.
6. **Surveying for Wells MW-12 through MW-14.** No casing elevations have been presented in previous reports for monitoring wells MW-12 through MW-14. Water level elevations from these wells have not been used to help evaluate the hydraulic gradient for the site. Given the apparent anomalous hydraulic gradient at the site, as was previously discussed in ACEH's June 30, 2005 correspondence, the incorporation of all water level data is necessary for the site. Please survey all existing and proposed wells as necessary to provide accurate water level elevations throughout the site. Please present the results, including a groundwater elevation contour map, in the Subsurface Investigation Report requested below.
7. **Comments from June 30, 2005 ACEH Correspondence.** Please review the technical comments from our June 30, 2005 correspondence to assure that each of the comments are addressed. Please present the results in the Subsurface Investigation Report requested below.
8. **Groundwater Monitoring.** Quarterly groundwater monitoring is required for this site. Please continue quarterly groundwater monitoring and submit the results in quarterly groundwater monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **November 15, 2005** - Quarterly Monitoring Report for the Third Quarter 2005
- **February 15, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005 and Interim Remediation System Report
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- **May 15, 2006** - Quarterly Monitoring Report for the First Quarter 2006

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UNDERGROUND STORAGE TANK CLEANUP FUND

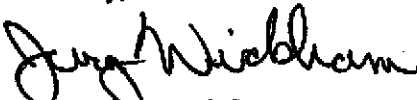
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Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Jo'l Chapman
Advanced GeoEnvironmental, Inc.
837 Shaw Road
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Donna Drogos, ACEH
Jerry Wickham, ACEH
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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



sent
10-27-05

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October 26, 2005

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Rinehart Oil, Inc.
2401 North State Street
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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

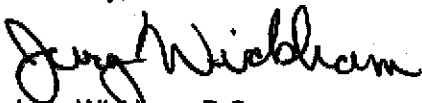
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Jo'l Chapman
Advanced GeoEnvironmental, Inc.
837 Shaw Road
Stockton, CA 95215

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
7-1-05

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

June 30, 2005

Reed Rinehart
Rinehart Oil, Inc.
2401 North State Street
Ukiah, CA 95482

Subject: Fuel Leak Case No. RO0000234, Rino Pacific/Oakland Truck Stop, 1107 5th Street, Oakland, CA

Dear Mr. Rinehart:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Quarterly Report -Fourth Quarter 2004," dated February 16, 2005, prepared on behalf of Rinehart Oil, Inc. by Advanced GeoEnvironmental, Inc. We are concerned with the high concentrations of petroleum hydrocarbons and fuel oxygenates that continue to be detected in groundwater samples collected quarterly at the site. In addition, an interim remediation system utilizing ozone sparging was approved for the above referenced site in correspondence from this office dated March 4, 2003. To date, we have not received any reports to indicate that installation of this system is complete and whether this system is operating.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Interim Remediation System.** An interim remediation system utilizing ozone sparging was approved for your site in correspondence from this office dated March 4, 2003. Please provide information on the operation and monitoring of this system in the Interim Remediation System Report requested below.
2. **Free Product Delineation.** The extent of free product has not been sufficiently defined for the site. Free product has been observed in boring E-5 and in monitoring wells MW-7 and MW-8. The static water level is above the top of the screened interval in many existing monitoring wells at the site. Because the screened intervals for many of the existing wells are below the water table, free product, if present, may not be able to enter the wells. Please propose an investigation in the Work Plan requested below to delineate the extent of free product at the site. This investigation may include laser-induced fluorescence data from cone penetrometer borings, soil sampling, groundwater sampling, and/or monitoring wells screened across the top of the water table.
3. **Off-Site Extent of Plume.** The off-site extent of petroleum hydrocarbons and fuel oxygenates in groundwater has not been defined in the area west and northwest of well MW-8. Please provide a plan to complete this characterization in the Work Plan requested below.

We request that you immediately pursue off-site access agreements that you will need to complete your investigation activities.

4. **Vertical Delineation.** The vertical extent of soil and groundwater contamination has not been sufficiently defined for this site. Only two soil samples have been collected below a depth of 12.5 feet below grade (bg). No depth-discrete groundwater samples have been collected. Please provide a plan to characterize the vertical extent of soil and groundwater contamination at the site in the Work Plan requested below.
5. **Preferential Pathways.** During 2002, eight soil borings were completed along utility corridors beneath 5th Street and Chestnut Street. High concentrations of total petroleum hydrocarbons and methyl tert butyl ether (MTBE) were detected in groundwater samples collected along 5th Street. Based on these results, additional borings are required to evaluate this utility corridor along 5th Street. In addition, the potential for utilities along Adeline Street to act as preferential pathways must also be evaluated. Please present plans for further evaluation of preferential pathways along 5th Street and Adeline Street in the Work Plan requested below.
6. **Hydraulic Gradient.** A groundwater mound in the area of well MW-10 appears to be an anomalous feature for this site. The origin of this groundwater mound, such as a leaking water line, and its effect on the hydraulic gradient and contaminant transport for the site is to be evaluated. Water lines or other potential sources of discharge near well MW-10 are to be located and plotted on a map. Groundwater from well MW-10 is to be analyzed for trihalomethanes during one quarterly groundwater monitoring event to help assess whether water treatment byproducts are present in shallow groundwater in this area. Please present these results in the Quarterly Monitoring Report for the Third Quarter 2005 requested below.
7. **Well MW-11.** The boring log for well MW-11 indicated that the boring extended to a depth of 28 bg but the well was constructed to a depth of 12 feet bg. The log does not indicate if the well was constructed in the same boring and if so, how the boring was backfilled to a depth of 12 feet bg.
8. **Sparge Wells.** One boring log is shown to represent all sparge wells at the site. Please confirm that all sparge wells at the site were constructed identically to the well construction diagram shown in Appendix B or present separate boring logs or a table that shows variations in the as-built well construction details. The text in section 2.1.4 indicates that the filter packs for sparge wells extend from 9 to 13 feet bg but the diagram in Appendix B indicates that the filter pack extends to a depth of 15 feet bg. Please address this discrepancy in the Interim Remediation Report requested below.
9. **Site Conceptual Model.** The development of a Site Conceptual Model (SCM) for this site is encouraged in order to provide a framework for understanding the site conditions affecting the fate and transport of contaminants in the subsurface. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new

data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

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

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

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

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- d) Proposed activities to investigate and fill data gaps identified above.
- e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head

measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.

g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Report the information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Soil and Groundwater Investigation Report requested below.

10. **Groundwater Monitoring.** Quarterly groundwater monitoring is required for this site. Please continue quarterly groundwater monitoring and submit the results in quarterly groundwater monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **August 15, 2005** – Quarterly Monitoring Report for the Second Quarter 2005
- **August 30, 2005** – Work Plan for Additional Investigation
- **August 30, 2005** – Interim Remediation System Report
- **November 15, 2005** - Quarterly Monitoring Report for the Third Quarter 2005
- **120 days following ACEH approval of Work Plan** – Soil and Groundwater Investigation Report
- **February 15, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005

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

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.

Reed Rinehart
June 30, 2005
Page 5

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

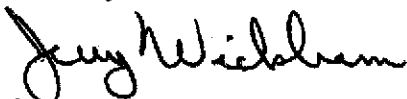
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Jo'l Chapman
Advanced GeoEnvironmental, Inc.
837 Shaw Road
Stockton, CA 95215

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



03-06-03

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

March 4, 2003

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

Dear Mr. Rinehart:

Subject: Fuel Leak Case RO0000234, 1107 5th St., Oakland CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP) staff has reviewed the subject site including the Quarterly Monitoring Report Fourth Quarter-2002 and Interim Remedial Action Plan from W. A. Craig. The work plan is conditionally approved subject to the technical comments below.

Technical Comments

1. Three (3) additional monitoring wells are proposed to further delineate the petroleum plume. Two are proposed off-site on the north side of 5th St. and the third is proposed in the northeast corner of the site. This third well, MW-14, should also be included in your sampling during the evaluation of the proposed ozone treatment system.
2. The installation of a hydrocarbon skimmer into MW-7 is approved as an initial approach to remove free product. You should continue to determine if the free product in this area is the result of past or current tank system releases.
3. Four hydropunch borings are proposed along the sewer corridor previously investigated. Two borings are proposed the west and two to the east of the previous borings. The previous conduit study results were not conclusive. Although significant elevated MTBE concentrations were detected in these samples it is uncertain whether they represent preferential migration or are just representative of a large MTBE plume. The additional borings will help determine which of these conditions exists. It appears that the borings to the east are not necessary given the results (34 ppb MTBE) found in boring B-5. However, if the borings to the west detect significant MTBE, you should also investigate any sewer lateral within Adeline St. that connects with the 5th St. lateral.
4. Our office concurs with the proposed interim remedial approach proposed, ozone sparging. The site conditions appear amenable to this approach and this technology has been shown effective in treating the contaminants found at this site. Quick determination of the effectiveness of this remediation can be observed using the existing monitoring wells and this approach is the most cost effective among those considered by your consultant (excavation, air sparging with vapor extraction and groundwater extraction).

Mr. Reed Rinehart
RO0000234
1107 5th St., Oakland CA 94607
March 4, 2003
Page 2

You may proceed with the proposed actions upon addressing the mentioned items. Please provide your status of this work in your monitoring reports.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. Tim Cook, W. A. Craig, Inc., 6940 Tremont Rd., Dixon, CA 95620

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

InfRAP1107 5th St.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



11-19-02

November 18, 2002

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

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

Dear Mr. Rinehart:

Subject: Fuel Leak Case RO0000234, Oakland Truck Stop, 1107 5th St., Oakland CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the October 28, 2002 Quarterly Groundwater Monitoring and Utility Corridor Investigation Report Third Quarter 2002 for the referenced site, prepared by W. A. Craig, Inc. I have also discussed the report with Mr. Tim Cook. Please address the following technical comments:

- The utilities appear to be acting as a conduit for preferential contaminant migration. Please confirm the extent of this contamination in the utility.
- The extent of the contamination has not been fully determined. Your consultant proposes to install two additional wells on the north side of 5th St. Please confirm the location of these proposed wells and consider additional wells, as necessary, to fully characterize the plume.
- Mr. Cook has recommended the installation of an ozone sparging system as an interim remedial action given the high TPH and MTBE concentration in groundwater both on and off-site. Please provide a site-specific work plan for performing a pilot test using this technology and your rationale for choosing this technique.
- Free product removal should also be performed as part of your interim remediation. Your report stated free product was observed in wells MW-7 and MW-8.

Please submit your work plan and response to these technical comments within 30 days or no later than December 20, 2002.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. T. Cook, W. A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

Intwp1107 5thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



05-28-02

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

May 23, 2002

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

Subject: Fuel Leak Site No. RO0000234, Oakland Truck Stop, 1107 Fifth St., Oakland, CA 94607

Dear Mr. Rinehart:

This letter responds to W. A. Craig, your consultant, May 6, 2002 request for an extension for the submittal of a conduit and preferential pathway report for the referenced property. An extension date of August 30, 2002 is requested. Our office had requested this report be submitted by May 15, 2002. It was our intention that the initial investigation would be theoretical first with actual sampling to follow. Mr. Tim Cook of W. A. Craig clarified this issue stating that the investigation would involve both. He will provide our office with copies of utility and conduit maps and propose logical sampling points for our concurrence.

With this clarification and understanding, the requested extension to August 30, 2002 is granted. At that time, a report of findings from the preferential pathway survey, along with recommendations should be submitted to our office. In addition, interim remediation should be proposed and implemented in the vicinity of MW-7.

You may contact me at (510) 567-6765 with questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. T. Cook, W. A. Craig, Inc., 6940 Tremont Rd., Dixon, CA 95620

Mr. S. Ramdass, SWRCB, 1001 I St., P.O. Box 944212, Sacramento, CA 94244

Wpext1107 5th St

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-16-02

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

April 15, 2002
RO0000234

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

Re: Fuel Leak Site, RO0000234, Oakland Truck Stop, 1107 Fifth St., Oakland, CA 94607

Dear Mr. Rinehart:

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the Quarterly Monitoring Report February 2002 for the referenced site prepared by W. A. Craig. Elevated Total Petroleum Hydrocarbons as gasoline (TPHg), as diesel (TPHd), BTEX and MTBE remain at the site at levels consistent with past readings. This letter serves to clarify the likely future actions necessary to further this site toward closure. It also confirms the items discussed on February 25, 2002 at the Water Board during a meeting with the State and Regional Water Boards, your consultant and representatives from Alameda County Environmental Health, LOP.

Technical Comments

1. It was agreed by all parties, this site would be a good candidate for the Pay for Performance (PFP) program, which seeks expedited site cleanup. Therefore the concept of PARGs, preliminary active remediation goals, was accepted. It was acknowledged that these goals would not necessarily guarantee for site closure once the 100% reduction step had been met. The site could be closed, require a new PFP or continued monitoring.
2. Typically a site must be adequately characterized before entering the PFP program. To do this, our office requests the performance of a conduit study and preferential pathway investigation including soil and groundwater sampling.
3. Groundwater gradient needs to be better defined. Therefore, our office has concurred with the destruction of MW-3 and its reinstallation and the installation of two off-site wells. Once the gradient is understood, an off-site investigation is necessary to determine the extent of the contaminant plume. The site could then enter the PFP program and cleanup milestones with PARGs proposed.
4. Interim remediation near MW-7 should be considered given the presence of free product and elevated MTBE.

Please submit the results of a conduit study and preferential pathway by May 15, 2002. You may contact me at (510) 567-6765 if you have any questions or comments.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. T. Cook, W. A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620
Mr. D. Charter, SWRCB, 1001 I St., P.O. Box 944212, Sacramento, CA 94244

Clar1107 5th St

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



10-31-01

October 30, 2001
StID 922/RO0000234

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

**Re: Site Investigation Work Plan (Revision 1), Oakland Truck Stop, 1107 5th St.,
Oakland CA 94607**

Dear Mr. Rinehart:

Our office has received and reviewed the October 22, 2001 Revised Work Plan for the referenced site as prepared by W. A. Craig, Inc. The work plan incorporates my comments to the original October 1, 2001 Site Investigation Work Plan. That work plan proposed numerous off-site borings equally spaced to the west, north and east of the site and two borings to the south. The numerous borings were proposed because the groundwater gradient was uncertain, therefore, all prior gradient directions were investigated. Instead of these numerous borings, our office recommended that you confirm groundwater gradient, then fewer strategic borings could be advanced. It is also likely that further down-gradient borings beyond those proposed will be necessary given the elevated MTBE concentrations in on-site wells. To better characterize the gradient, the work plan proposes well MW3 be properly closed and a new well next to it be installed. In addition, the two borings proposed to the south of the site will be converted into wells. These wells will be used to determine the extent of the contaminant plume in the southern direction as well as help verify gradient direction. It was noted that Aramark Inc. at 330 Chestnut St. is located immediately east of this site and has historically exhibited a southwest groundwater gradient, that is typically assumed in this area.

The revised work plan, ie the closure of MW3 and installation of MW-9 and MW-10 is approved. A minimum of one soil sample from the boring with the highest screening result should be analyzed along with a groundwater sample for the following analytes: TPHd, TPHg, BTEX and MTBE. These wells will be incorporated in the monitoring program for the site. Please have your consultant review the validity of all wells when determining the gradient, ie wells MW5 and MW-6 may be installed within the backfill of the existing underground tanks and should not be used in gradient determination. Please determine the viability of removing groundwater from these two wells as interim remediation for the elevated MTBE plume. Other anomalous results from wells should also be considered for omission in gradient determination.

Mr. Reed Rinehart
StID 922/RO0000234
1107 5th St., Oakland 94607
October 30, 2001
Page 2

You are also requested to perform soil sampling along the former piping runs and near the former dispensers since this sampling was apparently not performed during the 2/99 underground tank removals. This information will better characterize the site and may identify additional source areas. Please provide sample locations on Figure 2 of the submitted work plan revision.

Please also respond to the first two items in my October 2, 2001 letter. I requested clear maps (to scale) indicating the locations of former tank pit samples, recovery wells, trenches and sumps, tabulated analytical results and records documenting the disposal of free product and groundwater from interim remedial actions.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. Tim Cook, W. A. Craig, 6940 Tremont Road, Dixon, CA 95620

RevWP1107 5thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY



10-4-01

Oct 5, 2001
SID 922/RO0000234

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

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

Re: Oakland Truck Stop, 1107 Fifth St., Oakland, CA 94607

Dear Mr. Rinehart:

This letter serves to comment on W.A. Craig's August 29, 2001 response letter to my July 27, 2001 letter. It also includes comments following my recent conversation with Mr. Tim Cook of W. A. Craig where we discussed items in the response letter. Our office has the following observations and comments:

- It was noted that the information prepared by Trinity Excavation and Engineering detailing the underground tank removal and over-excavation was lacking items normally included in a tank closure report. Such items as a narrative of activities, clear maps of sample locations and tables of analytical results were lacking.
- The maps illustrating the recovery wells, trenches and sumps are not shown in relation to the excavation pit and the rest of the site. No records exist for the amounts of free product or groundwater removed from these various collection points. Certainly, disposal records exist and should be used to estimate quantities of removal. Please provide a summary table listing the amounts of liquids and soils removed from the site, the date of disposal and the locations from which they originated.
- No sampling or maps are provided indicating if and where samples were collected along piping runs and fuel dispensers, as required. You will need to provide this information or sample appropriate locations in the future.
- Because of the improper installation of MW-3, our office concurs that a well in the same general location should be installed, similar in construction to the other wells.
- Additional, on and off-site investigation is required to delineate the extent of the contaminant plume. As proposed by W. A. Craig, our office approves the submission of a work plan to perform this investigation. We also approve the submission of a remedial action plan (RAP) to address groundwater clean-up. W. A. Craig proposes to submit these work plans by October 1, 2001 and December 31, 2001, respectively.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. Tim Cook, W. A. Craig, 6940 Tremont Road, Dixon, CA 95620

Wpap1107 5thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-31-01

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

July 27, 2001
StID # 922/RO0000234

Mr. Reed Rinehart
Rinehart Distribution, Inc.
P.O. Box 725
Ukiah, CA 94582

Re: Oakland Truck Stop, 1107 Fifth St., Oakland CA 94607

Dear Mr. Rinehart:

Please be informed that the undersigned is the new County case worker for the subsurface investigation of soil and groundwater at the above referenced site. Upon review of the site history and the most recent, May 2001, Groundwater Monitoring Report, I have the following comments and questions regarding this investigation:

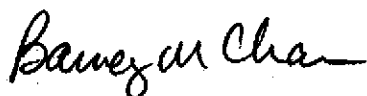
- Was an underground tank removal report ever submitted for the tanks removed in 2/99? Please provide, at a minimum, a site map indicating the sample locations and a table of analytical results.
- Please provide a description of the construction of the recovery wells, recovery trench and sump. What is the current status of their operation? Please provide a table indicating the amount of free product and liquid and mass of product removed from these collection points.
- Is any other remediation being performed at the site?
- Please indicate the location of former well MW-2 in your Figures.
- Please clarify whether wells MW5 and MW6 were installed within or outside the tank excavation pit. What if any difference might occur in the groundwater elevation and groundwater concentration if these wells are located in these two locations?
- The groundwater gradient at this site has been reported both southerly and now northerly. How do you explain the current northerly gradient being opposite what is typical of this area?
- Groundwater remediation will be required due to the elevated MTBE concentrations. It is recommended in the State Water Resources Control Board's Final Draft Guideline for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates that interim remedial action be performed at sites with persistent concentrations of MTBE over 10,000 ppb. This site appears to have an on-going problem with elevated MTBE possibly from an on-going release. Please confirm that the current underground tank system has passed its latest leak test and provide a proposal to perform interim remediation.
- Our office agrees with your consultant's recommendation to delineate the lateral extent of petroleum contamination. Both off-site and on-site investigation is warranted. Please also consider delineation to the south or adjacent to the main building. Temporary borings may be more efficient prior to any permanent well(s).

Mr. Reed Rinehart
July 27, 2001
StID # 922/RO0000234
Page 2.

Please respond to this letter within 30 days or no later than August 31, 2001.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. Tim Cook, W. A. Craig, 6940 Tremont Road, Dixon, CA 95620
Wprq1107 5th St.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-18-00

RO# 234

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

October 17, 2000

Mr. Reed Rinehart
Rinehart Distributing, Inc.
P.O. Box 725
Ukiah, CA 94587
STID 922

RE: Oakland Truck Stop, 1107 Fifth Street, Oakland, CA 94607

Dear Mr. Rinehart:

I have reviewed your Site Investigation Report dated September 15, 2000 that was prepared by W.A. Craig, Inc. Elevated levels of MTBE were detected in the soil and groundwater samples collected. Up to 800,000 ppb was detected in the groundwater samples collected from the on-site monitoring wells. In the next round of quarterly sampling, please confirm the presence of MTBE using EPA method 8260.

The groundwater sample from monitoring well MW-8 contained 18 ppb of benzene. Please have your consultant make a correction in the Site Investigation Report, Section 5 Conclusions to reflect this information.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Tim Cook, W.A. Craig, 6940 Tremont Road, Dixon CA 95620
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 6/2/2000
incl cd's

20234

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

June 2, 2000

Mr. Reed Rinehart
Rinehart Oil Inc.
Ukiah, CA 95482
STID 922

RE: 1107 5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

I have reviewed your Site Investigation Workplan dated May 23, 2000 that was prepared by W.A. Craig, Inc. This workplan includes the installation of six additional monitoring wells to a depth of approximately 15 feet below grade level. Soil cuttings from the drilling operations must be characterized and disposed of at the appropriate facility.

If you have questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Tim Cook, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 5-16-2000
incl CDs

20234

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

May 15, 2000

Mr. Reed Reinhart
Rinehart Oil Inc.
Ukiah, CA 95482
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

I have reviewed the proposed location of five (5) new monitoring wells (MW-4 to MW-8) in Figure 1 dated May 2000. Their locations are acceptable, but one additional monitoring well should be installed downgradient from MW-1. In the most recent sampling event on March 21, 2000, 4,800 ppb of MTBE was detected in MW-1. Please have your consultant submit a revised map identifying the proposed location of this additional well.

If you have any questions, please call me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Tim Cook, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 4-26-2000
incl. cc's

20234

April 25, 2000

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

Rinehart Oil, Inc.
P.O. Box 725
Ukiah, CA 95482
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

I approved the installation of six additional monitoring wells at the above site in a letter dated August 13, 1999. In your letter to me dated March 15, 2000, you indicated the wells have not been installed yet. **Please have your consultant contact me to review and discuss the monitoring well locations before you implement your workplan.** The State of California, State Water Board has a new recommendation concerning the placement of monitoring wells to verify a plume is diminishing in size.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Tim Cook, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT INWD
EO'S
2-28-2000

20234

February 28, 2000

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

Rinehart Oil Inc.
PO Box 725
Ukiah, CA 95482
Attn.: Mr. Reed Reinhart
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

Please submit a status report for the subsurface investigation for the above site that I approved in my letter dated August 13, 1999. This investigation included the construction of six-(6) groundwater monitoring wells and advancing four exploratory boreholes.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Tim Cook, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Sherry Niernan, State Water Board, PO Box 944212, Sacramento,
CA 94244-2120
Leroy Griffin, City of Oakland, 505 14th Street, 7th Floor, Oakland,
CA 94612

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0234

ENVIRONMENTAL HEALTH SERVICES

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

August 13, 1999

Rinehart Oil Inc.
P.O. Box 725
Ukiah, CA 95482
Attn: Mr. Reed Reinhart
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

I have reviewed your Project Summary/Revised Work Plan dated July 27, 1999 that was prepared by W.A. Craig, Inc. The work plan proposes the construction of six (6) groundwater monitoring wells and advancing four exploratory boreholes. This work plan is acceptable with the following conditions:

- 1) A minimum of one soil and one groundwater sample will be taken from each borehole and submitted to a certify laboratory for chemical analysis
- 2) Monitoring Well MW-7 should be relocated approximately 20 feet south from the proposed location in Figure 3 in order to be downgradient from the dispenser island

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto

Sr. Hazardous Materials Specialist

Cc: Tim Cook, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Sherry Niernan, State Water Board, P.O. Box 944212, Sacramento,
CA 94244-2120
Leroy Griffin, City of Oakland, 505 14th Street, 7th Floor, Oakland,
CA 94612

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



AS 234

June 25, 1999

ENVIRONMENTAL HEALTH SERVICES.

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

Mr. Reed Reinhart
Rinehart Oil Inc.
PO Box 725
Ukiah, CA 95482
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Reinhart:

I have reviewed the documents sent to me from Brian Kesler of Trinity Excavating and Engineering. I received the following documents: 1) City of Oakland Inspection Report dated 2-11-99 with the directive to over-excavate 2) Manifest for underground tank rinsate 3) Sampling map, not drawn to scale 4) laboratory results for confirmatory soil samples 5) laboratory results for stockpile soil 6) copy of receipts for the disposal of the water in the pit.

To assist me in evaluating the progress made in the investigation and remediation at this site, I need the following:

- 1) A summary of the investigation/remediation activities performed to this date.
- 2) A site map drawn to scale with streets and stationary landmarks
- 3) A sampling map drawn to scale
- 4) Copy of completed manifest for the disposal of the underground tank and rinsate
- 5) Identify the disposal site of the impacted soil that was excavated

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland Fire Department, 505-14th Street, 7th Floor,
Oakland, CA 94612

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0234

May 18, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Rinehart Oil Inc.
P.O. Box 725
Ukiah, CA 95482
Attn: Mr. Reed Reinhart
STID 922

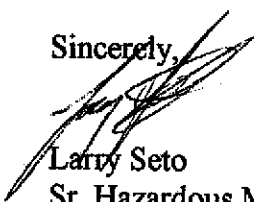
RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

Please inform this office within five (5) days of the receipt of this letter the status of the investigation detailed in your Work Plan Addendum dated August 27, 1998. As of this date, this office has not received a final report for this investigation.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto

Sr. Hazardous Materials Specialist

Cc: Tom Henderson, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Cheryl Gordon, State Water Board, P.O. Box 944212, Sacramento,
CA 94244-2120
Leroy Griffin, City of Oakland, 505 14th Street, 7th Floor, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 234

September 24, 1998

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

Rinehart Oil Inc.
P.O. Box 725
Ukiah, CA 95482
Attn: Mr. Reed Reinhart
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

I have reviewed your Work Plan Addendum dated August 27, 1998 that was prepared by W.A. Craig, Inc. It is acceptable.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Tom Henderson, W.A. Craig, 6940 Tremont Road, Dixon, CA 95620
Leroy Griffin, City of Oakland, 505 14th Street, 7th Floor, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0# 234

Certified Mailer # P 143 589 376

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

August 13, 1998

Rinehart Oil Inc.
P.O. Box 725
Ukiah, CA 95482
Attn: Mr. Reed Reinhart
STID 922

NOTICE OF VIOLATION

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

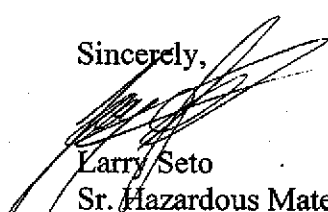
A letter addressed to you dated June 29, 1998 requested a subsurface workplan. As of this date, a subsurface workplan has not been received. **Please submit a subsurface workplan within 30 days of the receipt of this letter** to assess the subsurface condition on the southeast portion of the site, along Chestnut Street, and south of the site in the parking lot of the adjacent property. In addition, please submit all monitoring reports with sampling dates after September 9, 1997.

This office has not received any quarterly sampling results since the sampling on September 9, 1997. Since monitoring of the wells on-site commenced in November 1996, up to 51,000 ppb TPH(diesel), 31,000 ppb TPH(gas), 840,000 ppb MTBE, 4,000 ppb benzene, 3,100 ppb toluene, 860 ethyl-benzene and 12,000 ppb xylenes have been detected in groundwater.

Reports and proposals must be submitted under signature and seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Bob Chambers, Alameda County District Attorney's Office, Consumer and
Environmental Protection
Leroy Griffin, City of Oakland, 505 14th Street, 7th Floor, Oakland, CA 94612
Geoffery Fiedler, W.A. Craig, Inc., P.O. Box 448, Napa, CA 94559-0448
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

P0234

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

June 29, 1998

Rinehart Oil Inc.
P.O. Box 725
Ukiah CA 95482
Attn: Mr. Reed Rinehart
STID 922

RE: 1107-5th Street, Oakland, CA 94607

Dear Mr. Rinehart:

This office has not received any quarterly sampling results since the sampling on September 9, 1997. Since monitoring of the wells on-site commenced in November 1996, up to 51,000 ppb TPH(diesel), 31,000 ppb TPH(gas), 840,000 ppb MTBE, 4,000 ppb benzene, 3,100 ppb toluene, 860 ethyl-benzene and 12,000 ppb xylenes have been detected in groundwater.

Please submit a subsurface workplan within 30 days of the receipt of this letter to assess the subsurface condition on the southeast portion of the site, along Chestnut Street, and south of the site in the parking lot of the adjacent property. In addition, please submit all monitoring reports with sampling dates after September 9, 1998.

Reports and proposals must be submitted under signature and seal of a California-Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland, 505 14th Street, 7th Floor, Oakland, CA 94612
Geoffery Fiedler, W.A. Craig, Inc., P.O. Box 448, Napa, CA 94559-0448
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 234

May 21, 1997
LOP STID 922
page 1 of 2

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

Attn: Reed Rinehart
Rinehart Oil Inc.
PO Box 725
Ukiah CA 95482

RE: Rino Pacific site, aka J&O Truck Stop, 1107-5th St., Oakland CA 94607

Dear Mr. Rinehart,

Since my last letter to you, dated 9/20/96, the following documents have been submitted to this office:

- 1) "Subsurface Investigation Report," prepared by W.A. Craig, Inc., dated 1/17/97;
- 2) fax from WA Craig, dated 3/10/97 (re the passive skimmer);
- 3) fax from WA Craig, dated 3/14/97 (lab report for stockpile and MW results);
- 4) letter from Bernabe and Brinker, dated 3/16/97 (re the disposal of contaminated groundwater, with attachments); and
- 5) "Groundwater Monitoring Report, March 1997," prepared by W.A. Craig, Inc., dated 5/15/97.

The "Groundwater Monitoring Report" documents results of sampling conducted on 3/5/97. Groundwater flow direction has been documented as south to southeast, during three monitoring events from 10/21/96 to 3/5/97. Thus, MW2 appears to be the upgradient well. The concentrations of MTBE found in MW2 are some of the highest ever recorded in this office. MTBE is a gasoline additive. MW2 contained 470,000 ppb of MTBE on 11/4/96, and 760,000 ppb of MTBE on 3/5/97. Note that soils in MW2 (EB4) contained 83 ppm MTBE at 5'bgs. Groundwater was first encountered at 8'bgs, then stabilized at 5'bgs in MW2 (EB4). It thus appears that the MTBE found in groundwater in MW2 may be due to an onsite source. It is interesting to note that MW1 has been ND for MTBE (and TPHg and BTEX), while MW3 contained 1,000 and 13 ppb of MTBE during these sampling episodes. MW1 and MW3 are located approximately 60 and 30 feet from the UST complex, while MW2 is located approximately 15 feet from the UST complex. In order to determine if your USTs are the source of the MTBE, you are requested to collect water samples from RW-W and RW-E during the next quarterly event (scheduled for June), and analyze the samples for MTBE, as well as

May 21, 1997
LOP STID 922
page 2 of 2
Attn: Reed Rinehart

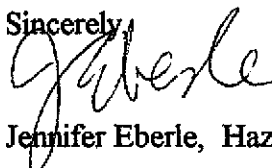
TPHd, TPHg, and BTEX. The TPHd, TPHg, and BTEX analyses are requested in order to determine if the groundwater contamination found in MW2 is due to the USTs. These RW wells are located approximately 7 feet from the UST complex, with RW-E (aka RW-2) in an immediate downgradient direction.

MTBE (and petroleum hydrocarbons) were found in soils in some of the other borings installed throughout the site in October 1996. The dispenser area was found to be impacted by hydrocarbons (and MTBE), as evidenced in EB-5 and EB-7. Groundwater samples were not collected in the dispenser area. However, free product was detected in soils at approximately 5' bgs in EB-5. **Therefore, you are requested to perform an additional Soil and Water Investigation (SWI), as per Sect. 2724 of Chapter 16, Division 3, Title 23, California Code of Regulations.** Rapid site assessment methods (i.e. cone penetrometer testing, geoprobe, hydropunch, etc.) are suggested to qualitatively assess impacts and to define the extent of the contaminant plume, as a first step of the SWI. The SWI may be used to later implement corrective action, as per a Corrective Action Plan, as defined in Sect. 2726 of Chapter 16, Division 3, Title 23, California Code of Regulations. **At a minimum, soil and groundwater samples should be collected near each dispenser and product line, to determine whether the dispensers and lines are a source(s) of contamination. Please submit a workplan for a SWI within 45 days, or by July 7, 1997.**

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

Lastly, you are requested to determine the elevations of the recovery wells, and report them during the quarterly monitoring reports. The elevations should be referenced to a known datum. Please contact me by telephone (510-567-6761) if you have any questions.

Sincerely,



Jennifer Eberle, Hazardous Materials Specialist

cc: Jeff Fiedler, W.A. Craig, Inc., PO Box 448, Napa CA 94559-0448
Pam Evans (Haz Mat)
Cheryl Gordon, SWRCB, UST Cleanup Fund
Jennifer Eberle/file

je.922-B

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO#234

March 3, 1997
STID 922

James Brinker
Ernie Bernabe
Bernabe & Brinker
1281-30th St.
Oakland CA 94608

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

RE: Rino Pacific site, 1107-5th St., Oakland CA 94607

Dear Mr. Brinker and Mr. Bernabe,

This office is in receipt of three invoices from your company, addressed to Mr. Tony Muir, J & O Tires, 1107-5th St., Oakland CA 94607. These invoices are dated 3-3-95, 3-3-95, and 4-1-95. Your invoice numbers are 2304, 2305, and 2307. They describe "profile, pump and ship" various amounts (the units are drums) of "waste" (invoice #2307) and "gasoline and water" (invoice #2304 and #2305). I have attached copies of these manifests for your information. Two of the three invoices describe a manifest number as well.

You are requested to provide copies of the manifests referred to in these three invoices. In addition, please indicate from where these wastes originated.

Lastly, you are requested to provide disposal documentation for the free product and/or groundwater which was apparently pumped out of the subsurface into the Baker tank at the above referenced site. Please indicate when this system was installed and when it operated, as well as quantities of free product and groundwater removed.

PLEASE RESPOND TO THESE REQUESTS IN WRITING WITHIN 30 DAYS, OR BY APRIL 3, 1997.

Sincerely

Jennifer Eberle
Hazardous Materials Specialist

cc: Mr. Leroy Griffin, City of Oakland, Fire Dept., Office of Emergency Services, 505-14th St., Suite 702, Oakland CA 94612
Mr. Tony Muir, J & O Tires, 1107-5th St., Oakland CA 94607
Mr. Reed Rinehart, Rino Pacific, PO Box 725, Ukiah CA 95482
Pam Evans/haz mat file
J. Eberle/LOP file

je.922-B&B
enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20234

September 20, 1996
LOP STD 922

Alameda County
Environmental Protection Services
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
CC4580

Attn: Reed Rinehart
Rinehart Oil Inc.
PO Box 725
Ukiah CA 95482

RE: Rino Pacific site, aka J&O Truck Stop, 1107-5th St., Oakland CA 94607

Dear Mr. Rinehart,

Thank you for submitting the "Workplan -- Soil and Groundwater Quality Investigation," prepared by W.A. Craig, Inc., dated 9/16/96. The workplan was received and reviewed today. This workplan involves seven soil borings, and the conversion of three into monitoring wells. **This workplan is acceptable on the condition that one additional monitoring well be installed to the south of the USTs, in the area indicated on Figure 1 as "accessible lane."** The reason for this request is due to the consistent southerly groundwater gradient at another site located approximately one block south of your site, known as Aramark (330 Chestnut St.).

In addition, you are requested to submit disposal documentation for the groundwater and/or free product which was already pumped into the existing Baker tank. As per our telecon on 8/30/96, you indicated that groundwater had already been disposed thusly. Was the free product skimmed off the top, and contained and disposed separately? When did these pumping activities occur? For how long? Does the Baker tank currently contain any water? Please respond to these questions in writing within 30 days, or by October 20, 1996.

Please contact me by telephone (510-567-6761) at least 3 business days in advance of field activities so that I may arrange to visit the site.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Jeff Fiedler, W.A. Craig, Inc., PO Box 448, Napa CA 94559-0448
Jennifer Eberle/file
Pam Evans
Cheryl Gordon, SWQRB, UST Cleanup Fund

je.922-A

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20234

Alameda County
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
CC4580

August 19, 1996

STID 922

page 1 of 2 Certified P 143 588 387

Attn: Reed Rinehart
Rinehart Oil Inc.
PO Box 725
Ukiah CA 95482

RE: **NOTICE OF VIOLATION, J&O Truck Stop, 1107-5th St., Oakland CA 94607**

Dear Mr. Rinehart,

We are in receipt of several letters from you, dated 2/22/95, 2/5/96, 5/10/96 (via fax), and 6/10/96 (unsigned). The 2/22/95 letter includes a "workplan" in "response to an unauthorized release." The "workplan" consists of a site map on a single page. The site map indicates two "recovery trenches" and an 18" slotted vertical pipe via the side view.

Jennifer Eberle of this office visited the site on 8/15/96, and confirmed the presence of a trench apparently filled with gravel, as well as a large and apparently empty above ground tank. Ms. Eberle spoke with Edward Talbot while onsite; he appears to be the operator of the USTs and J&O's Commercial Tire Center. Mr. Talbot indicated that although the gravel trench had been installed several months ago, PVC piping was installed just the day before (8/14/96). Mr. Talbot also indicated that the large above ground tank was to be used for groundwater and/or product extraction from the subsurface.

Although it was an attempt, the 2/22/95 "workplan" is not a valid workplan, primarily because it was not prepared by a qualified environmental consultant, as per the Tri-Regional Guidelines, and also because it was not approved by this office.

Your letter dated 2/5/96 indicates that "the contractor that started" the "cleanup process" was "continuing to recover contaminated product from the previously installed recovery wells." Again, this work was not approved by this office. This letter also indicates that a report would be submitted to our office as soon as it was available. In addition, your 6/10/96 letter indicates that you would probably be choosing W. A. Craig as your environmental consultant, and had planned to sign their contract on or before 6/26/96. As per a telecon with W.A. Craig on 8/13/96, we understand that you signed a contract for piping replacement in April or May; however, you had not signed a contract for subsurface investigation and/or remediation.

In addition, Pamela Evans sent you a "Notice of Legal Obligation," dated 4/25/96, which requested a copy of the latest investigation and cleanup report by 5/15/96. This Notice also instructed you to complete temporary closure of the gasoline tanks by June 30, 1996 and to inform her of the date the work was to begin. To date, we have not received any

August 19, 1996
STID 922
page 2 of 2
Attn: Reed Rinehart

environmental reports documenting the temporary closure or the investigation and/or remediation of this site.

For the above stated reasons, this Notice of Violation is being sent to you. Please note that J. Eberle left messages for you at the Ukiah number on 7/18/96 and 8/15/96 (on your voice mail), but she has not received any return calls.

You are requested to perform a Soil and Water Investigation (SWI), as per Sect. 2724 of Chapter 16, Division 3, Title 23, California Code of Regulations. Rapid site assessment methods (i.e. cone penetrometer testing, geoprobe, hydropunch, etc.) are suggested to qualitatively assess impacts and to define the extent of the contaminant plume, as a first step of the SWI. The SWI may be used to later implement corrective action, as per a Corrective Action Plan, as defined in Sect. 2726 of Chapter 16, Division 3, Title 23, California Code of Regulations. Please submit a workplan for a SWI within 14 days, or by September 2, 1996.

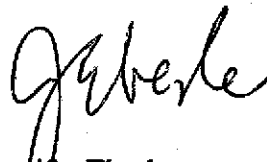
All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. **Reports and proposals must be submitted under signature and seal of a California-Registered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

You must also arrange for temporary closure of the two gasoline tanks. Inform Pamela Evans of the date this work will begin so that she may observe the procedure. **The tanks must be under proper temporary closure by September 10, 1996.**

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist



Jennifer Eberle
Hazardous Materials Specialist

cc: Acting Chief/file-je

je.922

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 234

ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510)

June 13, 1996

Reed Rinehart
Rinehart Oil
P.O. Box 2051
Woodland CA 95695

**RE: Underground Storage Tank (UST) Operating and Temporary Closure Permits
for
J&O Truckstop/Rino Pacific
1107 5th St., Oakland CA 94607**

Dear Mr. Rinehart:

Enclosed are permits to operate two (2) diesel fuel tanks and for temporary closure of two gasoline tanks at the above referenced facility. The permit for operation of the diesel tanks is valid until December 22, 1998. The permit for temporary closure of the gasoline tanks is valid for 12 months only, or until June 13, 1997. I have contacted Cheryl Gordon of the State UST Fund and will send her a copy of this letter and the permit by FAX by June 15.

The tanks and monitoring system to be used is briefly described below:

Tanks 1 and 3: Single-walled, steel 10,000 gallon diesel with single-walled pressurized fiberglass piping. The leak monitoring method used for these tanks is statistical inventory reconciliation and biennial tank tightness tests. Pipes are monitored with line leak detectors and are precision tested every two years. Leak monitoring equipment for the piping is inspected for proper function at least yearly.

Tanks 2 and 4: Single-walled, steel 10,000 gallon gasoline with single-walled pressurized steel piping. The piping for these tanks was found to be leaking in 1995. These tanks are not being operated, but will be permitted under temporary closure.

Continued compliance with applicable requirements of Chapter 6.7 and 6.75 of the Health and Safety Code and Title 23, California Code of Regulations is required. A copy of the standard Title 23 operating permit conditions is attached. In addition, the following permit conditions apply in order for these permits to remain valid.

Reed Rinehart
J&O Truckstop/Rino Pacific
June 13, 1996
Page 2 of 2

- 1) Submit May '96 SIR analysis report by June 30th, 1996.
- 2) Complete temporary closure of the gasoline tanks by June 30th, 1996. Please notify me as soon as possible of the date this work will begin so that I can observe the procedure.
- 3) Forward a work plan for the investigation of the extent of the fuel release by July 15, 1996.

If you make any changes in the monitoring methods, equipment types, and/or procedures used to monitor the tanks and piping at this facility, you must:

- 1) ensure the new procedures comply with Title 23, CCR; and
- 2) send written notification of the changes to this office.

You may contact me with any questions regarding the UST permit or this letter at (510) 567-6770.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

Enclosure

c: Gordon Coleman, ACDEH
Don Atkinson-Adams, ACDEH
Jennifer Eberle, ACDEH

2712. Permit Conditions

- RO#234
- (a) As a condition of any permit to operate an underground storage tank, the owner or operator shall comply with the reporting and recording requirements for unauthorized releases specified in Article 5.
 - (b) Written monitoring and maintenance records shall be maintained on-site or off-site at a readily available location, if approved by the local agency, for a period of at least 3 years, 6 1/2 years for cathodic protection maintenance records, and 5 years for written performance claims pertaining to release detection systems, and calibration and maintenance records for such systems. Records of repairs, lining, and upgrades shall be maintained on site or at another approved location for the remaining life of the underground storage tank. These records shall be made available, upon request within 36 hours, to the local agency or the State Water Board. Monitoring records shall include:
 - (1) The date, and time of all monitoring or sampling;
 - (2) Monitoring equipment calibration and maintenance records;
 - (3) The results of any visual observations;
 - (4) The results of all sample analysis performed in the laboratory or in the field, including laboratory data sheets and analysis used;
 - (5) The logs of all readings of gauges or other monitoring equipment, ground water elevations, or other test results; and
 - (6) The results of inventory readings and reconciliations.
 - (c) A permit to operate issued by the local agency shall be effective for five years. In addition to other information specified by the local agency, the permit shall include the permit expiration date, monitoring requirements, and the state underground storage tank identification number(s) for which the permit was issued. Before a local agency issues a new permit or renewal to operate an underground storage tank, the local agency shall inspect the underground storage tank and determine that it complies with the provisions of these regulations.
 - (d) Permits may be transferred to new underground storage tank owners if: (1) the new underground storage tank owner does not change conditions of the permit, (2) the transfer is registered with the local agency within 30 days of the change in ownership, and (3) state permit application forms are completed to show the changes. Transferred permits shall expire and be renewed on the original expiration date. A local agency may review, modify, or terminate the permit to operate the underground storage tank upon receiving an ownership transfer request.
 - (e) The local agency shall not renew an underground storage tank permit unless the underground storage tank has been inspected by the local agency or a special inspector within the previous three years and the inspection verified that the underground storage tank complied with the provisions of Article 3 or 4, as applicable, and with all existing permit conditions. The inspection shall be conducted as specified in the appropriate subsection of Chapter 6.7 of Division 20 of the Health and Safety Code. If the inspection indicates noncompliance, the local agency shall verify by a follow-up inspection that all required corrections have been implemented before renewing the permit.
 - (f) Within 30 calendar days of receiving an inspection report from either the local agency or the special inspector, the permit holder shall implement the corrections specified in the inspection report and comply with the permit conditions. The corrective action shall include all of the recommendations made by the local agency or special inspector. The local agency may waive the implementation of any of the special inspector's recommendations based on a demonstration by the permit holder to the local agency's satisfaction that failure to implement the recommendation will not cause an unauthorized

CCR, TITLE 23, DIVISION 3, CHAPTER 16, UNDERGROUND STORAGE TANK REGULATIONS

release.

- (g) The local agency shall take appropriate enforcement action pursuant to section 25299 of the Health and Safety Code or prohibit the operation of the tank systems if the owner or operator fails to comply with the monitoring requirements in Article 3 or 4 or the reporting requirements of Article 5.
- (h) The local agency shall provide the permittee with a written list of all permit conditions, including a condition that the owner and operator are subject to all applicable requirements of Chapter 6.7 and 6.75 of the Health and Safety Code and these regulations.
- (i) A copy of the permit and all conditions and attachments, including monitoring plans, shall be retained at the facility.
- (j) All primary containment shall be product-tight.
- (k) Owners and operators shall use care to prevent releases due to spilling or overfilling. Before product is delivered, owners, operators, or their agents shall ensure that the space available in the tank is greater than the volume of product to be transferred to the tank and shall ensure that the transfer operation is monitored constantly to prevent overfilling and spilling.

Authority: Health and Safety Code 25299.3, 25299.7

Reference: Health and Safety Code 25284, 25285, 25286, 25288, 25289, 25293, 25294; 40 CFR 280.31(d), 280.33(f), 280.45, 281.32(e)

2713. Transmittal of Unauthorized Release Reports