

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

November 29, 2006

Mr. Jerry Ni  
5882 Turnberry Drive  
Dublin, CA 94568-7473

Mr. Aziz Kandahari  
Himalaya Trading Company  
5196 Grayhawk Lane  
Dublin, CA 94568

Mr. Mohammand Mashoon  
Zima Center Corporation  
5 Admiral Drive, #301  
Emeryville, CA 94608

Clifford and Diana Lee  
645 16<sup>th</sup> Avenue  
San Francisco, CA 94118

Subject: Fuel Leak Case No. RO0000261, ARCO, 2951 High Street, Oakland, CA 94619

Dear Mr. Ni, Mr. Kandahari, Mr. Mashoon, and Clifford and Diana Lee:

Alameda County Environmental Health (ACEH) and California Regional Water Quality Control Board staff have reviewed the fuel leak case file and case closure summary for the above-referenced site and concur that no further action related to the underground storage tank fuel release is required at this time. Prior to issuance of a remedial action completion certificate, the monitoring wells installed at the site and off-site are to be properly destroyed, should the monitoring wells have no further use. Please decommission the monitoring wells and provide documentation of the well decommissioning to this office. A remedial action completion certificate will be issued following receipt of the documentation.

Well destruction permits may be obtained from the Alameda County Public Works Agency (<http://www.acgov.org/pwa/wells/index.shtml>). 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

cc: Jennifer Rice, Law Offices of Jennifer Rice, 2175 North California Blvd., Suite 575, Walnut Creek, CA 94596

Tim Cook, Cook Environmental Services, Inc., 271 Las Juntas Way, Walnut Creek, CA 94597

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

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1131 Harbor Bay Parkway, Suite 250  
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November 13, 2006

Mr. Jerry Ni  
5882 Turnberry Drive  
Dublin, CA 94568-7473

Mr. Aziz Kandahari  
Himalaya Trading Company  
5196 Grayhawk Lane  
Dublin, CA 94568

Mr. Mohammad Mashoon  
Zima Center Corporation  
5 Admiral Drive, #301  
Emeryville, CA 94608

Clifford and Diana Lee  
645 16<sup>th</sup> Avenue  
San Francisco, CA 94118

Subject: Fuel Leak Case No. RO0000261, ARCO, 2951 High Street, Oakland, CA 94619

Dear Mr. Ni, Mr. Kandahari, Mr. Mashoon, and Clifford and Diana Lee:

Alameda County Environmental Health (ACEH) have reviewed the fuel leak case file and case closure summary for the above-referenced site and conclude that no further action related to the underground storage tank fuel release is required at this time. The case is to be closed for commercial land use only with a requirement that the case be reviewed if land use changes in the future. The ACEH conclusions and fuel leak case closure summary were submitted on November 13, 2006 to the California Regional Water Quality Control Board for their review and concurrence.

Sincerely,

Jerry Wickham  
Hazardous Materials Specialist

cc: Jennifer Rice, Law Offices of Jennifer Rice, 2175 North California Blvd., Suite 575, Walnut Creek, CA 94596

Tim Cook, Cook Environmental Services, Inc., 271 Las Juntas Way, Walnut Creek, CA 94597

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

**Drogos, Donna, Env. Health**

**From:** jrice [jrice@netvista.net]  
**Sent:** Friday, October 27, 2006 3:15 PM  
**To:** Drogos, Donna, Env. Health  
**Subject:** Re: need to change time for our call on 10/26

Hi Donna:

I caught a bad cold in Europe, and today was my first day back in the office. In addition, our computers were down until about 3:00 p.m., so I've just found your email. Sorry for the late reply. Please call me on Monday, either 10:30 to 11:45 a.m. or 2 - 5 p.m. It's now urgent that we speak - I've just been informed that the current owners of 2951 High Street are attempting to refinance, and are threatening to sue my client for additional costs involved because of the failure to obtain closure. We really need you help to avoid a lawsuit.

Yours,

Jennifer Rice

----- Original Message -----

**From:** Drogos, Donna, Env. Health  
**To:** Jennifer Rice  
**Sent:** Wednesday, October 25, 2006 6:12 PM  
**Subject:** need to change time for our call on 10/26

Hi Jennifer,

We are set to talk tomorrow at 1p however I have a schedule conflict & will be in a workshop tomorrow. I can call you Thursday from 430p on or Friday 10/27 between 9-11a. Do any of these times work for you?

Thanks, Donna

**Drogos, Donna, Env. Health**

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**From:** Jennifer Rice [jrice@netvista.net]  
**Sent:** Monday, October 02, 2006 11:16 AM  
**To:** Drogos, Donna, Env. Health  
**Subject:** Re: 2951 High Street, Oakland.  
**Attachments:** ACEH 10-2-06.doc

Please see attached correspondence.

~ ~ ~  
Jennifer Rice

October 2, 2006

Donna Drogos  
Supervising Hazardous Materials Specialist  
Alameda County Department of Environmental Health  
1131 Harbor Way Parkway  
Alameda, CA 94502

**RE: 2951 High Street, Oakland Request for Closure.**

Dear Ms. Drogos:

I represent Himalaya Trading Company, a former owner of the above-referenced property. A Request for Closure of the site was submitted to your department (ACEH) on October 20, 2005.

Eleven months have now elapsed since the Request for Closure was submitted. During that period, despite the fact that MtBE levels at the site are two full orders of magnitude below the site specific threshold levels approved by ACEH, my client has incurred over Thirty Thousand Dollars in technical and legal fees complying with multiple requests for additional information from the ACEH caseworker, Don Hwang. This letter is to inform you and ACEH that, for the reasons set forth below, my client is no longer willing to work with Mr. Hwang. In addition, on my client's behalf I request that this matter be given a high priority and that a formal timetable be set for the remaining steps in the closure procedure.

For the past eleven months, my client's environmental consultant, Tim Cook, of Cook Environmental Services, and myself, have made an ongoing effort to maintain communications and co-operate promptly with Mr. Hwang's constantly changing requirements. The process has been made immeasurably more difficult and expensive because Mr. Hwang has shown himself to be ill-prepared to the point of technical incompetence. He has repeatedly raised objections that the most cursory review of the data has dispelled. The only thing consistent about his review of the Request for Closure has been the broken promises to complete reviews of the Request and additional submissions by the dates he has specified. Instead, each time my client performs the required action and submits requested data, Mr. Hwang finds an additional "concern" and requires further action. Many of Mr. Hwang's demands have been arbitrary and capricious, and it is clear that rather than performing a review of this case, he is merely seizing on one excuse after another to avoid having to perform.

In every instance, until the most recent telephone call to which you were a party, my client has promptly complied with Mr. Hwang's conditions, regardless of how frivolous or burdensome. As a result, Mr. Hwang now agrees that the site is ready for closure. Having run out of reasonable technical grounds for denying closure, Mr. Hwang is now refusing to recommend closure unless my client provides a complete and exhaustive summary of fifteen-years of historical data, all of which are already on file with ACEH. Mr. Hwang concedes that this data is irrelevant to the current condition of the site, has no bearing with respect to human health or environmental risk. He admits this stipulation is of academic interest only. He

Pursuant to the Verification Monitoring Plan, site monitoring wells were sampled for four quarters prior to the request for closure. The last sampling occurred on October 4, 2005. As concentrations for all eight monitoring wells remained significantly below the site specific threshold levels for six consecutive quarters (since May 2004) a Request for Site Closure, (including a Site Closure Summary as Appendix C) was submitted to ACEH on October 20, 2005.

In August 2005, I made several telephone calls to ACEH and to the Regional Water Quality Control Board (RWQCB) regarding the site. For business reasons, I needed to advise my client regarding the procedure and approximate timetable for closure. My first call, by coincidence, was taken by Don Hwang, who informed me that the case was unassigned at that time, and advised me to speak to his supervisor. I was surprised when Mr. Hwang then seized the opportunity to complain bitterly and at length about the poor organization and morale at ACEH, which he blamed largely upon his supervisor. Among other things, he told me that while the department contained only four case workers, each of whom had over 100 cases, the supervisor "doesn't feel that she should take more than her two cases." He gave me his supervisor's email address and advised me to contact her via email because "(s)he's not real good at returning phone calls." This resentment became a recurring theme in subsequent communications from Mr. Hwang.

Pursuant to Don Hwang's instructions, I contacted you via email, requesting information regarding the closure procedure and on September 9, 2005 you telephoned and described the process of review and closure presentation by the caseworker, final review by you, and by the Regional Board. My notes indicate that you thought 2.5 to 3 months was a reasonable time for review by ACEH, with an additional 60 days for review by the Regional Board. In that call, to my concern, you informed me that the case had been assigned to Don Hwang. Despite the lack of professionalism Don Hwang had evidenced in our prior telephone call, I was anxious that the review move forward, and so did not object. My telephone call to the RWQCB confirmed that six months was a reasonable period for the processing of a Request for Closure.

Between November 2005 and the end of January 2006, my client's environmental consultant, Tim Cook of Cook Environmental Services, Inc., attempted to contact Don Hwang several times to discuss the site. When Mr. Hwang failed to return Tim Cook's calls, I called him myself. After I had left several messages, Mr. Hwang returned my call and informed me that the site was very near to closure but that he had some questions. As the questions were technical, I referred him to Tim Cook. This became something of a pattern, in which Don Hwang returned telephone calls and presented technical questions to me, rather than to Tim Cook, although he knew that all information and answers came from Tim Cook. This, together with the fact that he returned calls outside of business hours, further delayed communications, and gave Don Hwang a smokescreen which made it appear as if he were taking action while concealing his lack of preparation or understanding.

monitoring system that will shut down the system if a leak of more than 0.1 gallons per hour occurs, and that the system is monitored monthly by a California certified UST Operator. In other words, any leak from the new system would have to be below the thresholds established by the State Water Resources Control Board.

Throughout mid to late April, we endeavored to discuss the status of the review with Don Hwang. He informed us that he needed to discuss the case with you, and that he had difficulty speaking with you as you were only available on Thursdays from 1 to 3 p.m. He informed us that you had concerns about the source of MtBE in the northwestern portion of the site, despite the fact that the MtBE concentrations in the area were well below SSTLs and MtBE cleanup goals commonly used by the RWQB, and that the monitoring wells sampled were outside both the area of excavation and the influence of the ozone sparge system.

As a result of my complaint to you about the constantly changing and apparently arbitrary conditions for closure that were being raised in the telephone calls, you instructed Don Hwang to issue written Technical Comments, which he did on May 5, 2006. The Technical Comments requested additional historical data from the files at ACEH, an additional round of groundwater sampling, the installation and sampling of three borings near the existing USTs, a survey of all wells within 2,000 ft of the site, a preferential pathway analysis, and a calculation of MtBE plume velocity. I must point out that all of the foregoing extensive information was requested for the first time six months after the Request for Closure was submitted, and had not been raised in the prior requests for information made by Mr. Hwang.

Despite a delay caused by ACEH's slow response to Tim Cook's request for file review, a complete Response to Technical Comments and a work plan describing the installation of the three borings near the existing USTs was submitted to ACEH on June 12, 2006. Tim Cook followed up with an email request to Don Hwang on June 14, 2006 for approval of the installation of the three borings. On June 15, 2006, Tim Cook submitted the results of the May 24, 2006 groundwater sampling event to ACEH. Please note that the preparation of the two reports required by the Technical Comments took over 100 man hours, at a cost to my client of approximately \$10,000.

On June 20, 2006, having heard nothing from Don Hwang, Tim Cook called him and learned from his voicemail that he would be out of the office until June 30, 2006. On June 21, 2006 I called and left a message for you, asking that this case be given a higher priority.

On July 3, 2006, after business hours, Don Hwang left a message on my voicemail, stating that he was working on our case, and was "shooting to get us a letter back in something like two weeks." I called him back the following day, and asked him to give the matter a higher priority. He returned my call on July 7, 2006, and informed me that he could not work on any cases because you had assigned him a large quantity of administrative work. He was very concerned about whether or not I had left another message for you. I pointed out to Don Hwang

Risk-Based Corrective Action Plan. When I asked him to please do so promptly, he informed me that he would not do so because he had other priorities.

On September 14, 2006, at my insistence, Tim Cook, Don Hwang and I held another telephone conference to discuss site closure. Mr. Cook presented data prepared by Eric Lautenbach P.E., a specialist in the calculation of ESL cleanup levels, that determined that MtBE concentrations in groundwater below 1,800 ug/L did not pose a risk to human health or environmental receptors. Mr. Hwang requested a copy of this report and it was emailed to him that same day. Mr. Hwang requested additional time to review this report and seek the advice of his supervisor.

On September 21, 2006, another telephone conference call took place between Tim Cook, Don Hwang, you and myself. As you heard for yourself, Mr. Hwang was unprepared and unfamiliar with the site, so that simple matters like the area of excavation had to be explained to him once again. He stated unequivocally that he agreed with the ESL groundwater cleanup levels calculated by Mr. Lautenbach and that the site should be closed. However, he once again refused to proceed with case closure unless my client provided additional soil and groundwater data. Mr. Cook stated that a Site Closure Summary was submitted to him in October 2005 and again in February 2006. Mr. Hwang stated that he needed a complete set of all the soil and groundwater data collected at the site since the inception of site investigation work in the early 1990's. Mr. Cook and I explained to him that the site has been more than adequately characterized in the documents submitted during the past eleven months, and moreover, all site data is available to him in the ACEH files which are within 10 feet of his office. Don Wang stated that this is not acceptable and a full submission of all data would be required before he would take any further action on this case. This position is unreasonable, unduly burdensome, arbitrary, and capricious.

I consider it a serious denial of due process to delay closure of this case any longer. From the day he acquired this property my client has done everything in his power to investigate and remediate its condition as required by law. He and his consultant have actively sought the input of ACEH staff every step of the way, and have complied with every condition, no matter how irksome or burdensome. No one could have done more. It cannot be reasonably argued that the site poses a human health or environmental risk. On my client's behalf I request that ACEH prioritize this matter, complete the review, and forward the matter to the RWQCB without further delay.

Very truly yours,  
Jennifer Rice  
JR:dk



**Drogos, Donna, Env. Health**

**From:** Jennifer Rice [jrice@netvista.net]  
**Sent:** Monday, September 25, 2006 2:00 PM  
**To:** Drogos, Donna, Env. Health  
**Subject:** Re: 2951 High Street, Oakland/ Request for Closure

Good - I'll call you at 11 on Wednesday.

----- Original Message -----

**From:** Drogos, Donna, Env. Health  
**To:** Jennifer Rice  
**Sent:** Monday, September 25, 2006 12:02 PM  
**Subject:** RE: 2951 High Street, Oakland/ Request for Closure

Wed at 11a works for me. No need for Tim's time also, I think you & I can resolve. Thanks & we will talk Wed. Donna

Donna L. Drogos, PE  
LOP Program Manager  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502

510-567-6721  
donna.drogos@acgov.org

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**From:** Jennifer Rice [mailto:jrice@netvista.net]  
**Sent:** Monday, September 25, 2006 11:24 AM  
**To:** Drogos, Donna, Env. Health  
**Subject:** 2951 High Street, Oakland/ Request for Closure

Dear Donna:

I plumbed the depths of my email, and found your address, so am following up my voicemail of Friday, September 22, 2006. Thank you for offering to discuss this matter with us. As Tim Cook's availability is limited this week, to avoid further delay, I think it would be best for you and I talked first without him. The best times for me are as follows: (i) this afternoon, Monday, 9/25, from 2 p.m. until 5p.m.; (ii) Tuesday 9/26, any time except for 11:45 a.m to 1:30 p.m.; (iii) Wednesday, 9/27, from 11 to 11:30 a.m. or between 2 and 5 in the afternoon; (iv) Thursday, 9/28 before 11:00 a.m. or after 1p.m.

Please inform me which time is most convenient for you, and I will prepare for the call.

Yours truly,

Jennifer Rice

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



7

July 12, 2006

Aziz Kandahari  
Himalaya Trading Company  
2951 High Street  
Oakland, California 94619

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

Dear Mr. Kandahari,

Subject: Fuel Leak Case No. RO0000261, Express Gas & Mart, 2951 High Street,  
Oakland, California 94619

Alameda County Environmental Health staff has reviewed the proposal to collect groundwater and soil samples from three temporary borings located downgradient of the new tank system as described in "Addendum to Work Plan" dated July 10, 2006, and "Response to Technical Comments and Work Plan for Additional Investigation" dated June 12, 2006, both by Cook Environmental Services, Inc. You may implement your proposal to collect groundwater and soil samples from the three temporary borings provided that you concur with the following technical comment. We request that you address the following technical comments and perform the proposed work.

#### TECHNICAL COMMENTS

Selection of soil samples for analyses - "Response to Technical Comments and Work Plan for Additional Investigation" proposes to collect soil samples at the groundwater interface. Although soil samples collected at the groundwater interface are likely to be the most contaminated, please also use photoionization detector (PID) readings and odor and visual observations to identify the most contaminated soil samples for analyses.

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

Sincerely,

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Tim Cook, Cook Environmental Services, Inc., 271 Las Juntas Way,  
Walnut Creek, CA 94597  
Donna Drogos  
File

RO 261

**Hwang, Don, Env. Health**

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**From:** tim cook [tcook@cookenvironmental.com]  
**Sent:** Friday, May 26, 2006 12:17 PM  
**To:** Hwang, Don, Env. Health  
**Subject:** 2951 High Street, Oakland

Don,

Please note that although Mr. Aziz Kandahari is the RP for the subject site, he does not own it any longer. You mailed your last correspondence dated May 5, 2006 to the site. He did not receive it. I faxed it to him today. In the future please address all correspondence to Mr. Kandahari as follows:

Aziz Kandahari  
Himalaya Trading Company  
5196 Grayhawk Lane  
Dublin, CA 94568

Thank you,  
Tim Cook  
Cook Environmental Services

R0261

**Hwang, Don, Env. Health**

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**From:** Hwang, Don, Env. Health  
**Sent:** Wednesday, May 17, 2006 10:42 AM  
**To:** 'tcook@cookenvironmental.com'  
**Subject:** RE: 2951 High Street Oakland, Case No. O0000261

Tim,

I concur with using groundwater gradient maps in each quarterly monitoring report instead.

Don

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**From:** tim cook [mailto:tcook@cookenvironmental.com]  
**Sent:** Monday, May 15, 2006 10:02 AM  
**To:** Hwang, Don, Env. Health  
**Cc:** Jennifer Rice  
**Subject:** 2951 High Street Oakland, Case No. O0000261

Don,

I have reviewed your 5/5/06 letter regarding the subject site. At present, I am trying to set up a date to review the site files in your office. I faxed in a request to Ms. Coleman-Ali on 5/11/06 and have not received a call back. Would you please request that she call me to set up an appointment? My phone number is 925-937-1759.

The only issue I have with your letter is your request for a Rose diagram to show historical hydraulic gradients. As I mentioned to you in our phone conversation, Rose diagrams can only depict the hydraulic gradient between three points (i.e., triangulation). The Rose diagram will give misleading information about the overall hydraulic gradient at the site (i.e., the hydraulic gradient changes between any three points and we have 10 data points (wells)). A much better way to evaluate hydraulic gradients is to compare groundwater gradient maps already included as Figure 2 in each quarterly monitoring report.

Regards,

Tim Cook  
Cook Environmental Services

5/17/2006

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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May 5, 2006

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

Aziz Kandahari  
Himalaya Trading Company  
2951 High Street  
Oakland, California 94619

Dear Mr. Kandahari,

Subject: Fuel Leak Case No. RO0000261, Express Gas & Mart, 2951 High Street,  
Oakland, California 94619

Alameda County Environmental Health staff has reviewed "Request for Site Closure" dated October 20, 2005 and "Addendum to Request for Site Closure" dated February 16, 2006, both by Cook Environmental Services, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Analytical reports and results of soil samples by MW-1 collected September 27, 2001 not provided – During the most recent groundwater monitoring event on October 4, 2005, 400 ug/l MTBE was detected in MW-1. The data requested may determine if the source of the MTBE is from this area. Please submit.
- 2) Additional groundwater sampling - During the most recent groundwater monitoring event on October 4, 2005, 490 ug/l MTBE was detected in MW-10. Please propose groundwater sampling to determine if active tanks or dispensers are responsible for MTBE found in MW-10. Please indicate on the site map the proposed groundwater sampling locations and the active tanks and dispensers. Also, indicate when the current tank system became operational.
- 3) 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.
- 4) Analytical results for groundwater samples incomplete – Omitted were MW-2 (STMW-2), MW-4, analyses for TPHD and TOG for MW-1 (STMW-1) and MW-3 (STMW-3). Please include these results in your tables.
- 5) Soil and groundwater contaminant concentration site maps - Please show soil and groundwater contaminant concentration sample locations data on site maps. Include dates of sample collection and for soil samples, depth at which sample

- was collected. In addition to items featured, include previously installed monitoring wells and dispensers.
- 6) Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site.
    - a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan requested below.
  - 7) Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map and tabulate well construction details for each well. Please submit with the Work Plan requested below.
  - 8) Groundwater monitoring well sampling – Reinstate at least for another quarter.
  - 9) Inactive groundwater monitoring wells - Please determine if STMW-2 and MW-4 have been properly decommissioned.
  - 10) Plume velocity - Please determine for the hydrocarbon dissolved phase groundwater plume.
  - 11) Analytical results for soil samples – Tabulation of soil samples results required. Please submit.

#### TECHNICAL REPORT REQUEST

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

Analytical reports and results of soil samples by MW-1 collected September 27, 2001  
Work Plan for additional groundwater sampling  
Historical hydraulic gradients rose diagram  
Analytical results for groundwater samples tables  
Soil and groundwater contaminant concentration site maps  
Preferential pathway survey  
Well survey  
Groundwater monitoring well report  
Decommissioned groundwater monitoring wells report  
Plume velocity  
Analytical results for soil samples tables

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.

ELECTRONIC SUBMITTAL OF REPORTS

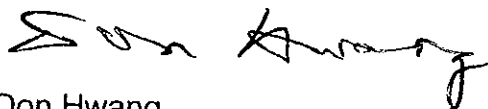
Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory 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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at [don.hwang@acgov.org](mailto:don.hwang@acgov.org).

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

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

C: Tim Cook, Cook Environmental Services, Inc., 271 Las Juntas Way,  
Walnut Creek, CA 94597  
Donna Drogos  
File

Ro 261

**Hwang, Don, Env. Health**

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**From:** Tim Cook [cookenvironmental@att.net]  
**Sent:** Wednesday, March 22, 2006 8:38 PM  
**To:** Hwang, Don, Env. Health  
**Cc:** Jennifer Rice  
**Subject:** 291 High Street, Oakland  
**Attachments:** 2951 High Street Oakland-MtBE Plume.pdf

Don,

Per our telephone conversation of 3/21/06, I looked at the MtBE plume map again from the October 20, 2005 Request for Site Closure Report. I made some changes to the contours of the MtBE plume shown on Fig 5 attached. The plume is now more elongate and narrower as Donna Dragos had commented. More to the point, the MtBE concentrations are far below the site specific threshold level of 8,400 ug/L that the risk assessment conducted for this site established for the cleanup level. The County agreed to this SSTL. Additionally, MtBE concentrations are below the 500 ug/L screening cleanup level that the San Francisco Bay RWQCB uses. Four quarters of verification monitoring were completed last October. No rebound of hydrocarbon concentrations has occurred. We have complied with every request the County has made for the last six months to get this site closed. I strongly recommend that this site be closed.

Tim Cook, PG, PE  
Cook Environmental Services

3/23/2006



**LEGEND**

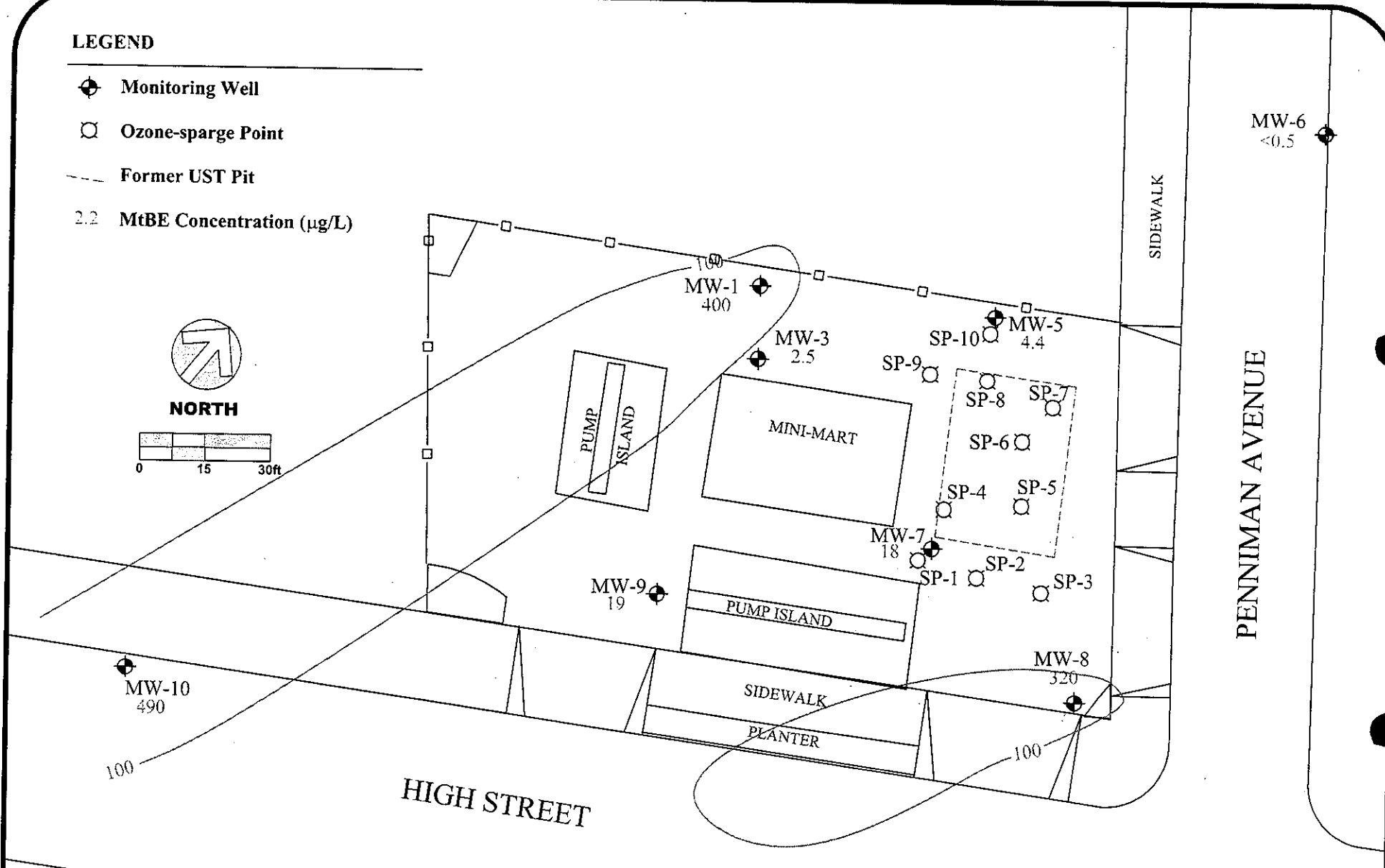
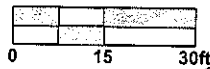
- ⊕ Monitoring Well
- Ozone-sparge Point

--- Former UST Pit

2.2 MtBE Concentration (µg/L)



**NORTH**



Cook Environmental Services, Inc.  
 271 Las Juntas Way  
 Walnut Creek, CA 94597  
 (925) 937-1759 work  
 (925) 937-6869 cell  
 cookenvironmental@att.net

**MtBE Concentrations in Groundwater  
 on October 4, 2005**

Express Gas & Mart  
 2951 High Street  
 Oakland, California

Project #: 1004	Figure:
Date: 10/20/05	5
Scale: 1"=30'	

**Drogos, Donna, Env. Health**

---

**From:** Jennifer Rice [jrice@netvista.net]  
**Sent:** Friday, September 09, 2005 3:01 PM  
**To:** Drogos, Donna, Env. Health  
**Subject:** RE: No Further Action Letter

Dear Ms. Drogos:

I represent Himalaya Trading Company, which undertook and completed the environmental clean-up of 2951 High Street, Oakland, a gas station. This email is a follow-up to my correspondence to you of September 2, 2005, and my telephone messages of August 31 and September 1. It is vitally important that I be able to discuss this case with someone from your department as soon as possible. I will be available by telephone at (925)945-0811 at the following times: 9/12/05 all day; 9/13/05 from 1 p.m. to 5 p.m.; 9/14/05 all day; on 9/15/05 until 1:30 p.m. I would be very grateful if you or a member of your staff familiar with the case could call me at one of the above times, or, if more convenient, correspond via email.

Thank you for your help.

Jennifer Rice, Attorney at Law



**W. A. Craig, Inc.**  
Engineering & Construction

Alameda County  
JUL 27 2004  
Environmental Health

6940 Tremont Road  
Dixon, CA 95620  
A,B Haz License #455752  
Tel (707) 693-2929  
Fax (707) 693-2922

July 19, 2004

**Project No. 3936**

Mr. Don Wang  
Alameda County Environmental Health  
1311 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

**Subject: Project Update and Additional Recommendations  
Express Gas & Mart  
2951 High Street, Oakland, California**

Dear Mr. Wang:

In April 2004, W.A. Craig, Inc. (WAC) installed an ozone sparging system to chemically oxidize MtBE and other dissolved hydrocarbons in shallow groundwater. This system was fully operational on April 14, 2004. The treatment system is located behind the gas station in a small 6' x 5' chain link fence.

During a recent site visit the site owner, Mr. Aziz Kandahari, brought to our attention that the treatment system chain link fence has no slats or barbed wire. Mr. Kandahari claims that people can use the fence surrounding the treatment system to gain access to the roof of his gas station. Also he is concerned about vandalism to the treatment system due to its visibility.

WAC recommends the installation of gray vinyl slats and a single strands of barbed wire and/or razor wire along the top of the fence to mediate these potential problems. Please respond with your comments or concerns so that we can proceed with our recommendations.

Sincerely,

**W.A. Craig, Inc.**

Clayton Mokri  
Geologist

cc: Mr. Aziz Kandahari, Kandahari Trading Company

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

February 18, 2004

Aziz Kandahari  
Himalaya Trading Company  
2951 High Street  
Oakland, California 94619

Dear Mr. Kandahari,

Subject: Fuel Leak Case No. RO0000261, Express Gas & Mart, 2951 High Street,  
Oakland, California 94619

Alameda County Environmental Health staff has reviewed "Feasibility Study/Corrective Action Plan" dated July 28, 2003, and "Addendum to Corrective Action Plan" dated September 10, 2003, both by W.A. Craig, Inc. The purpose of the reports was to evaluate potential remedial methods to address fuel related contamination in soil and groundwater at the site and to establish cleanup levels and goals. Ozone-sparging was recommended. We approve of the implementation of ozone-sparging for interim source control. The review of other issues will be completed in the future.

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

Sincerely,

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Tim Cook, 6940 Tremont Rd., Dixon, CA 95620  
Donna Drogos  
File

**Hwang, Don, Env. Health**

---

**From:** Tim Cook [timc@wacraig.com]  
**Sent:** Monday, December 22, 2003 3:03 PM  
**To:** Don Hwang  
**Subject:** Interim Remedial Action Plan, 2951 High Street, Oakland

Don,  
In response to your two questions regarding the IRAP for 2951 High Street:

- 1) You indicated that the SSTLs in the Risk Assessment Addendum and those shown in the IRAP are different. You are correct for benzene since the indoor air risk scenario for onsite contamination is the driving SSTL. The SSTL for benzene should be 34 ppb not 200ppb. All other SSTLs are correct.
  
- 2) You asked about an item stated on the KV Sparge webpage that stated that one of the ways to monitor the effectiveness of the sparge system is to measure the rise of elevation head in a nearby monitoring well. You asked how this could happen. The pressure head from delivering 30 to 40 psi in the sparge well will in some cases cause a rise in elevation head in nearby wells. I called KV Sparge to ask if this typically happens. They said that many times they have observed a rise of 1 to 2 inches of elevation head in a nearby monitoring well caused by the pressure head in the sparge well increasing the water table elevation head. In addition the effervescence in the well may cause elevation heads to increase slightly.

I look forward to receiving your approval to implement the interim remedial action in the near future. We are ready to proceed immediately.

Tim Cook, PE  
Project Manager

R261

**W.A. CRAIG, INC.**  
**Environmental Consulting & Construction**  
**6940 Tremont Rd.**  
**Dixon, CA 95620**  
**(707) 693-2929**  
**fax (707) 693-2922**

# Fax

**To:** Amir Gholami **From:** Tim Cook

---

**Fax:** (510) 337-9335 **Pages (including this one):** 1

---

**Phone:** (510) 567-6876 **Date:** March 13, 2003

---

**Re:** Himalaya Trading Company, 2951 High Street, Oakland 34619

Urgent     Informational     Please Comment     Please Reply     Please Recycle

**• Comments:**

Amir:

Just a heads up on the installation of four monitoring wells at the subject site. We will install the wells in the locations you approved in our *Interim Site Investigation Work Plan*. The start date will be March 24, 8 am. We have an encroachment and excavation permit from the City of Oakland as well as a well permit from Alameda County Public Works. The USA Ticket number is #089968. You are welcome to stop by and check out our field investigation. Call me at (707) 693-2929 if you have questions or concerns.

Regards,

Tim Cook

Dons



# State Water Resources Control Board



Gray Davis  
Governor

Winston H. Hickox  
Secretary for  
Environmental  
Protection

Division of Clean Water Programs  
1001 I Street • Sacramento, California 95814  
P.O. Box 944212 • Sacramento, California • 94244-2120  
(916) 341-5757 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.*

November 27, 2002

Himalaya Trading Company; Assignee  
Aziz Kandahari  
32785 Olympiad Ct  
Union City, CA 94587

RO261

Alameda County  
DEC 09 2002  
Environmental Health

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS,  
CLAIM NO. 008355, PA # 7  
SITE ADDRESS: 2951 HIGH ST, OAKLAND, CA 94619**

I have reviewed your request, received on October 30, 2002, for pre-approval of corrective action costs. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the February 12, 2002, W.A. Craig, Inc. workplan approved by the Alameda County EHD (County) in their May 15, 2002 letter, is \$ 22,177; see the table below for a breakdown of costs. *(The total amount that has been reimbursed and approved for payment up to this point is \$ 498,473.)*

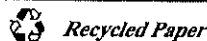
Be aware that this pre-approval does not constitute a decision on reimbursement: **necessary** (as determined by the Fund) corrective action costs for action work **directed and approved by the County** will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary.

In an effort to expedite future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we ask that the attached 'Pre-Approval Specific Reimbursement Request Form' be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

***In order for future costs for corrective action to be part of the expedited reimbursement process, they must be pre-approved in writing by Fund staff.***

***All costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations in order to be eligible for reimbursement.***

*California Environmental Protection Agency*



**COST PRE-APPROVAL BREAKDOWN**

#	Task*	Amount Pre-Approved	Comments
1	Project Development and Regulatory Correspondence, Permits, H&SP	\$3,275	This cost includes all time, materials and markups associated with this task. Copies of all permits must be submitted to the Fund. Note: The requested costs (\$1,900) for the Interim Site Investigation Workplan cannot be pre-approved because this task was completed on February 12, 2002. The eligibility of this cost will be evaluated at the time of reimbursement.
2	Onsite Technical Supervision, Materials and Traffic Control	\$3,465	This cost includes all time, materials and markups associated with this task.
3	Drilling Subcontractor (4-30' MWs)	\$6,739	This cost includes all time, materials and markups associated with this task.
4	Well Development, Soil & GW Sampling, Analytical	\$4,523	This cost includes all time, materials and markups associated with this task. Copies of all sub-invoices must be submitted to the Fund.
5	Monitoring Well Survey and Quarterly GW Monitoring Report, EDF, Etc.	\$4,175	Copies of all reports must be submitted to the Fund.
<b>TOTAL PRE-APPROVED</b>		<b>\$ 22,177</b>	

\* Task descriptions are the same as those identified in W.A. Craig, Inc.'s October 17, 2002 cost estimate.

- Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to be determined if the additional tasks and costs are necessary and reasonable. However, if costs exceed the above pre-approved amounts, the Fund will be unable to expedite your Reimbursement Request.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.



November 27, 2002

- Although I have referred to the W.A. Craig, Inc. proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated October 17, 2002 by W.A. Craig, Inc. for conducting the work approved by the County.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary future corrective action work. If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *Please insure that your consultant prepares their invoices to include the required breakdown of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- subcontractor invoices,
- technical reports, when available, and
- applicable correspondence from the County.

Please call if you have any questions; I can be reached at (916) 341-5757.

Sincerely,

*Sunil Ramdass*

Sunil Ramdass, Water Resources Control Engineer  
Technical Review Unit  
Underground Storage Tank Cleanup Fund

Enclosure

cc: Ms. Donna Drogos  
Alameda County EHD  
1131 Harbor Bay Pkway, 2nd Fl.  
Alameda, CA 94502-6577

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 16, 2001

**STID 1038**

Mr. Aziz Kandahari  
Himalaya Trading Company  
2951 High Street  
Oakland, CA 94619

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA 94619**

Dear Mr. Kandahari:

This office is in receipt of Addendum to Pre-Approval Request dated July 5, 2001 submitted by Mr. Steve Hardister of W.A. Craig, Inc. regarding the above referenced site. I have also discussed this case with Mr. Cook of W.A. Craig Inc. I understand that Mr. Cook will be submitting a report along with recommendations concerning the clean up process at the above referenced site.

Please contact my office for a written approval prior to any more remedial activity (including use of ORC, Oxygen Releasing Compound), additional feasibility studies, and or further delineation of soil and groundwater in general.

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

1038 *shp*

*Answer*  
7/16/01  
*[Signature]*



**W. A. CRAIG, INC.**

Environmental Contracting and Consulting

6940 Tremont Road  
Dixon, California 95620

Contractor and Hazardous Substances License #455752

e-mail: tech@wacraig.com  
(800) 522-7244

Dixon (707) 693-2929

Fax: (707) 693-2922

Napa (707) 252-3353

July 5, 2001

Project No. 3936  
UST Claim #8355

Mr. Dave Charter  
State Water Resources Control Board  
Division of Clean Water Programs  
P.O. Box 944212  
Sacramento, CA 94244-2120

**JUL 13 2001**

Subject: **Addendum to Pre-Approval Request**  
**2951 High Street**  
**Oakland, California**

Dear Mr. Charter:

In a letter dated June 6, 2001 (enclosed), W.A. Craig, Inc requested pre-approval for the excavation and offsite disposal of 1,600 tons (1,200 cubic yards) of contaminated soil from the subject site. In a cost pre-approval letter dated June 19, 2001 (enclosed), you conditionally approved our request. Based on new information obtained during the excavation of these soils, additional excavation will be required by the Alameda County EHD to meet site specific cleanup levels for soils. Enclosed is **Figure 6-8-01-A** showing the approximate area to be excavated. Based on previous observations we will excavate to a depth of approximately 13 feet bgs. The total estimated volume of soil to be excavated is approximately 1,400 tons (1,000 cubic yards).

Our cost estimate to implement this additional excavation, including sampling, oversight, transportation, disposal, backfill, and paving is summarized in **Table 1**. Areas to be repaved with asphaltic concrete and concrete are shown on the enclosed Repaving figure. Also please find a fully executed Cost Pre-Approval Request Form for this addendum.

The total estimate cost for this addendum is \$135,729. Please call me at (707) 693-2929 if you have any questions or concerns regarding this project.

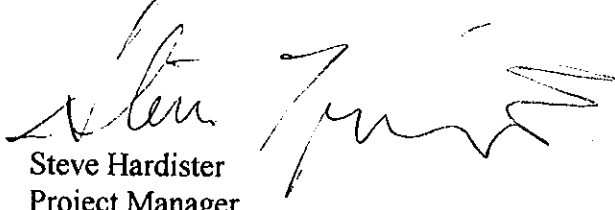
Addendum to Cost Pre-Approval  
2951 High Street  
Oakland, California

July 5, 2001  
Project No. 3936  
Page 2

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Sincerely,

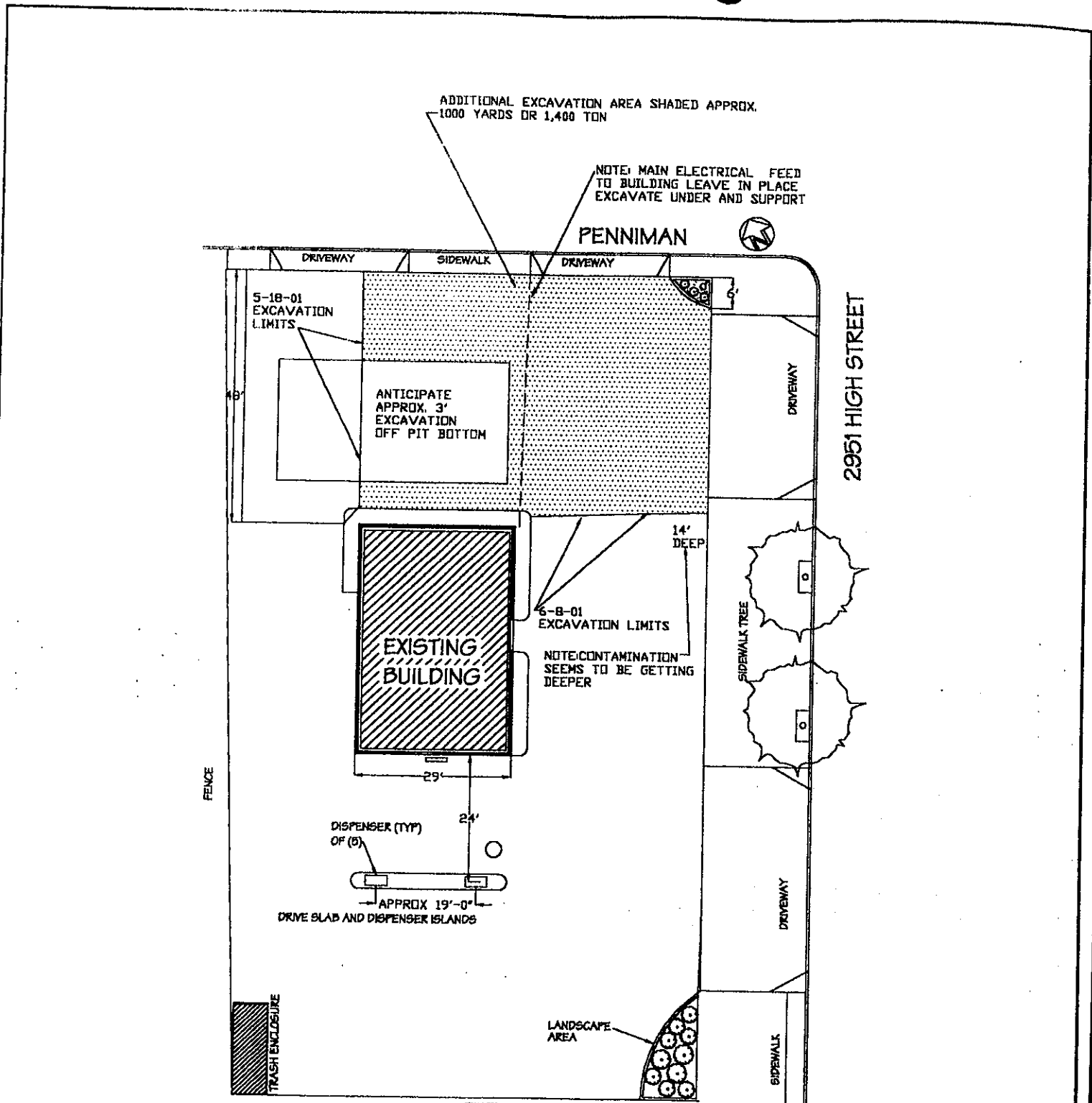
**W.A. Craig, Inc.**



Steve Hardister  
Project Manager

Enclosures (6)

Cc: Mr. Amir Gholami, Alameda County EHD  
Mr. Aziz Kandahari, Himalaya Trading Company



Excavation and sampling Site Map

ENVIRONMENTAL CONSULTING AND CONTRACTING



W.A. CRAIG, INC.

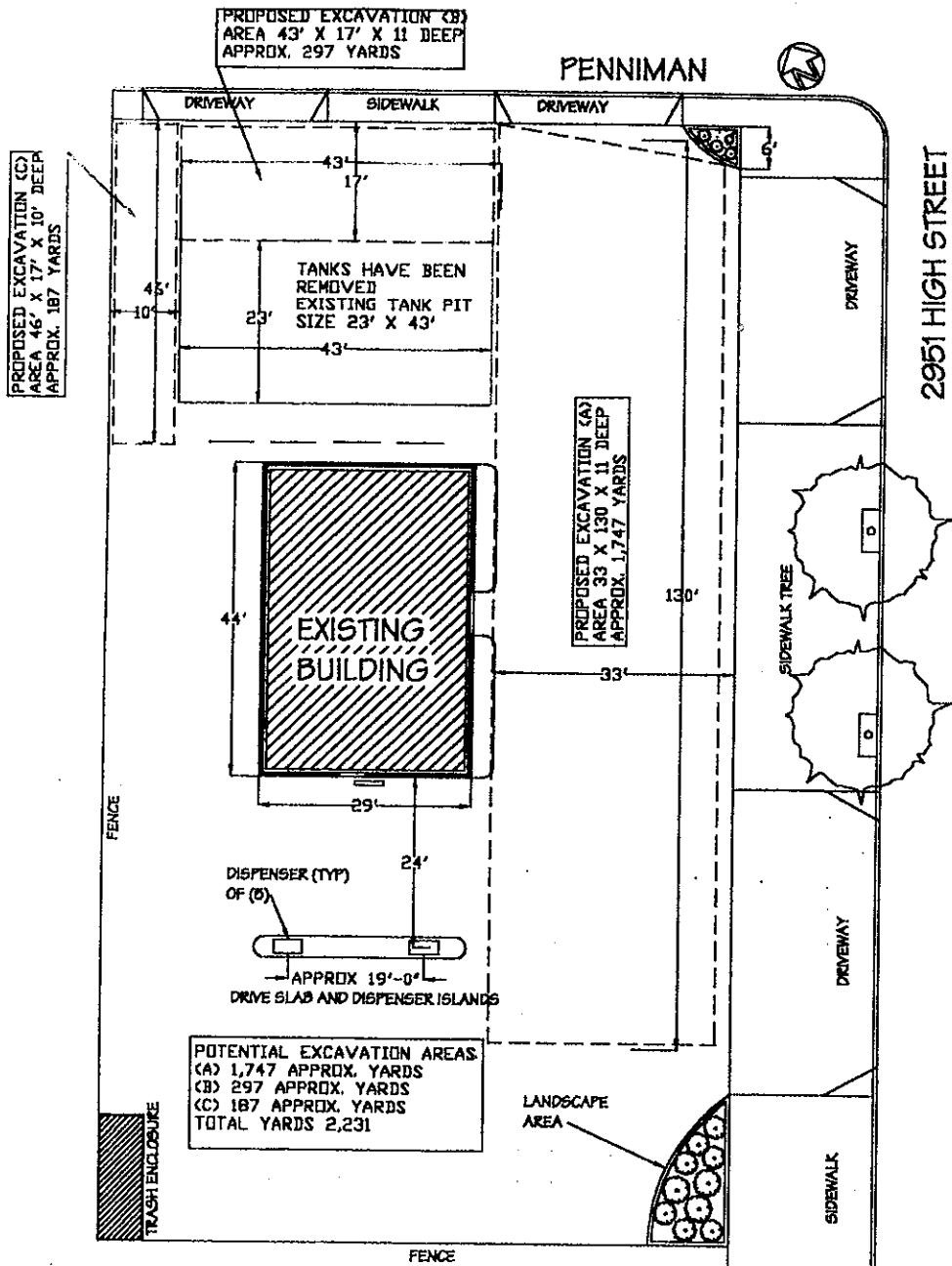
6840 TREMONT ROAD  
 DIXON, CALIFORNIA 95620  
 PH# (707) 693-2929  
 LIC# 455752

Project Name and Address

EXPRESS GAS & MART  
 2951 HIGH STREET  
 OAKLAND, CA  
 JOB # 3936

FIGURE #

6-8-01-A



Existing Site Map Proposed excavation

Firm Name and Address

DESIGN BUILD CONTRACTORS  
ENVIRONMENTAL CONSULTING AND CONTRACTING



**W.A. CRAIG, INC.**

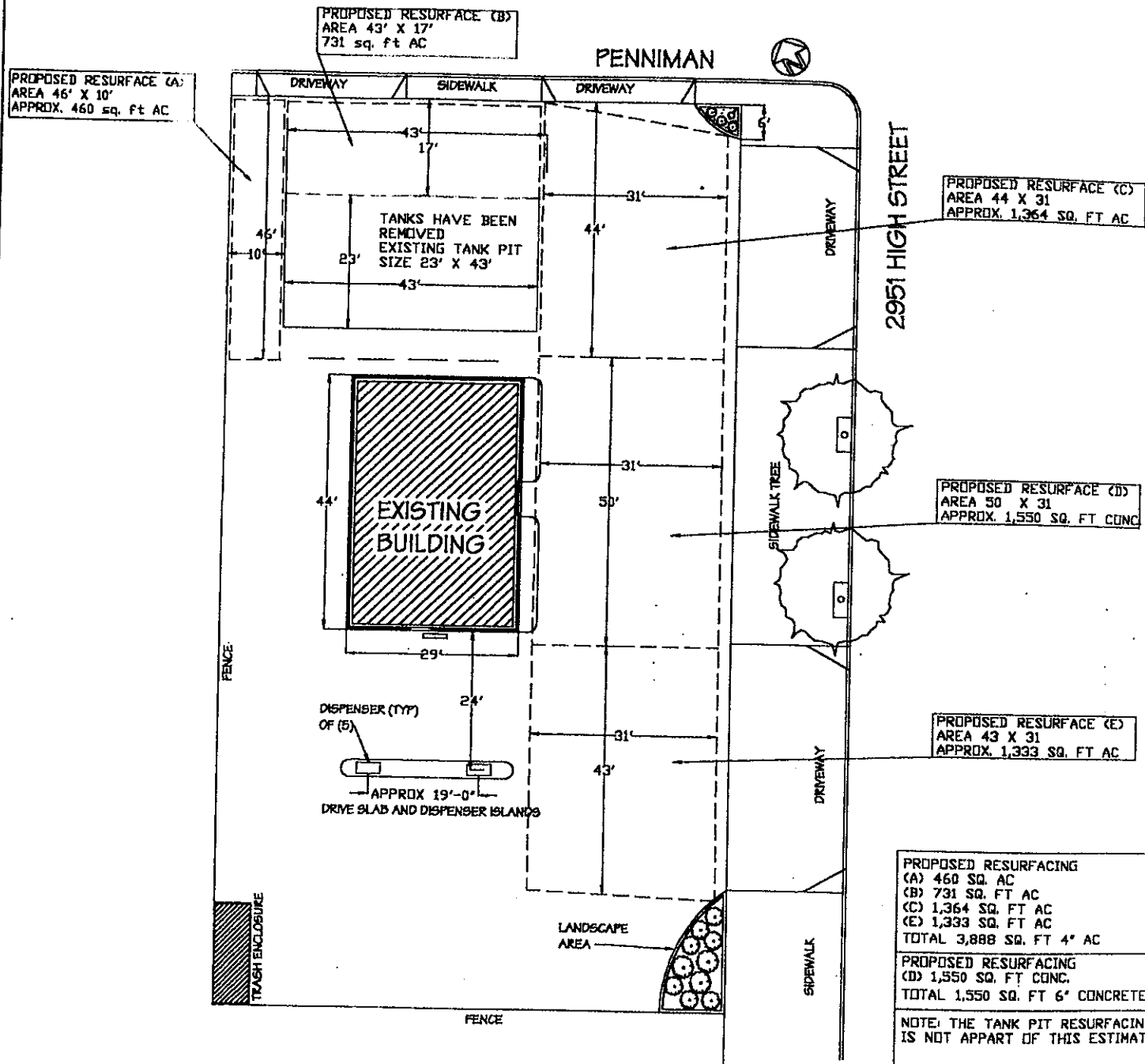
8840 TREMONT ROAD  
DIXON, CALIFORNIA 95620  
PH: (707) 893-2929  
LIC: 455752

Project Name and Address

EXPRESS GAS & MART  
2951 HIGH STREET  
OAKLAND, CA

**FIGURE #**

Proposed excavation



Existing Site Map Proposed Resurfacing

Firm Name and Address

DESIGN BUILD CONTRACTORS  
ENVIRONMENTAL CONSULTING AND CONTRACTING



**W.A. CRAIG, INC.**

6840 TREMONT ROAD  
OAKDN, CALIFORNIA 95820  
PH# (707) 893-2929  
LIC# 455752

Project Name and Address

EXPRESS GAS & MART  
2951 HIGH STREET  
OAKLAND, CA

FIGURE #

RESURFACING

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

June 26, 2001

**STID 1038**

Mr. Aziz Kandahari  
Himalaya Trading Company  
2951 High Street  
Oakland, CA 94619

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA 94619**

Dear Mr. Kandahari:

I received a faxed letter from Ms. Christine Truesdale of W. A. Craig, Inc. informing me of an error in my letter issued on June 21, 2001 to Mr. Mashhoon of Zima Center, the previous owner. Attached below, please find a copy of this letter with correction addressed to you:

I have received a faxed copy of Remedial Action, dated June 20, 2001, along with a copy of a letter by my former colleague, Madhulla Logan, concerning a risk assessment performed dated August 22, 1997 regarding the above referenced site. Both documents were submitted by Mr. Tim Cook of W.A. Craig, Inc.

The above risk assessment was performed to establish site specific target levels (SSTL's). I further understand that you are still in the process of over-excavation and that SSTL levels will be used during the over-excavation activity. Per my discussion with Mr. Cook the only area that you could not excavate down to SSTL level is the area by the sidewalk in order to prevent damage to the side walk structural integrity.

Mr. Cook informed me that after the over-excavation activity the area will be back filled with clean soil followed by submittal of a workplan to delineate the extent of groundwater plume.

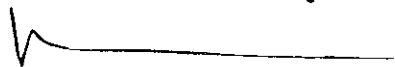
As discussed earlier and per my discussion with Mr. Tim Cook of W.A. Craig, Inc. you need to ensure some soil/groundwater sampling is performed downgradient of all former sources.

Please be aware that pending the result of this investigation, additional soil/groundwater sampling might be deemed necessary in order to delineate the extent of the plume properly.

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



Sincerely,

A handwritten signature in black ink, consisting of a stylized 'A' followed by a long horizontal line.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

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

June 26, 2001

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Himalaya Trading Company  
2951 High Street  
Oakland, CA 94619

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

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'V' shape followed by a horizontal line.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

stib  
1838

**W.A. CRAIG, INC.**  
**Environmental Consulting & Construction**  
**6940 Tremont Rd.**  
**Dixon, CA 95620**  
**(707) 693-2929**  
**fax (707) 693-2922**

# Fax

**To:** Amir Gholami **From:** Christine Truesdale

---

**Fax:** (510) 337-9335 **Pages (including this one):**

---

**Phone:** **Date:** June 26, 2001

---

**Re:** 2951 High Street, Oakland

---

Urgent     For Review     Please Comment     Please Reply     Please Recycle

• **Comments:**

Dear Mr. Gholami:

We received a copy of your letter to Mr. Mohammed Mashhoon, dated June 21, 2001, regarding your receipt of the Remedial Action Plan and letter by Madhulia Logan.

In your letter you refer to the Zima Center Corporation at 2951 High Street. The previous owner/claimant's name was Mohammed Mashhoon and Zima Center Corporation. The present owner/claimant's name is Aziz Kandahari and the Himalaya Trading Company.

In the interest of keeping all concerned parties (both regulatory and claimant) on the same track, could you please reissue your letter addressing Mr. Kandahari and referring to the site as Himalaya Trading Company at 2951 High Street, Oakland? If you have any questions, please call (707) 693-2929.

Sincerely,

W.A. Craig, Inc.

*Christine Truesdale*  
 Christine Truesdale

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

June 21, 2001

**STID 1038**

Mr. Mohammed Mashhoon  
Zima Center Inc.  
1751 Jefferson Street  
Oakland, CA 94612

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA 94619**

Dear Mr. Mashhoon:

I have received a faxed copy of Remedial Action, dated June 20, 2001, along with a copy of a letter by my former colleague, Madhulla Logan, concerning a risk assessment performed dated August 22, 1997 regarding the above referenced site. Both documents were submitted by Mr. Tim Cook of W.A. Craig, Inc.

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Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

**W.A. CRAIG, INC.**

**Environmental Consulting & Construction**

**6940 Tremont Rd.**

**Dixon, CA 95620**

**(707) 693-2929**

**fax (707) 693-2922**

*STID  
1038 ✓*

*Reviews 3  
Responsibility  
6/21/01  
[Signature]*

**Fax**

**To:** Amir Ghouliani **From:** Tim Cook

---

**Fax:** (510) 337-9335 **Pages (Including this one):** 2

---

**Phone:** (510) 567-6876 **Date:** June 20, 2001

---

**Re:** Remedial Action, 2951 High Street, Oakland

Urgent     For Review     Please Comment     Please Reply     Please Recycle

**• Comments:**

Amir,

~~As mentioned in the initial risk assessment, the initial risk assessment for the site located at 2951 High Street, Oakland, CA. As mentioned to date we have excavated and disposed of approximately 1,800 cubic yards of contaminated soil. Soil samples collected from the base of the excavation are below the SMTLs established in the risk assessment. We still have another 1.5 weeks of excavating to go. After backfilling the excavations, we will submit a workplan to delineate the lateral and vertical extent of the groundwater plume. I look forward to working with you on this project. Please call me at (707) 693-2929 if you have questions or comments.~~

Regards,

Tim Cook, PE  
Principal Engineer

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

October 21, 1997

**Mr. Mohammed Mashoon**  
2951 High St,  
Oakland, CA - 94619**STID 1038****RE: Zima - 2951 High Street, Oakland, CA**

Dear Mr. Mashoon:

I am in receipt of the initial risk assessment document, dated May 19, 1997, addendum to the risk assessment report, dated August 5, 1997 and the final risk assessment document, dated August 22, 1997, prepared by Christopher Palmer, for the above referenced site.

The risk assessment was conducted using ASTM's Risk Based Corrective Action (RBCA) methodology. The risk assessment was conducted for different scenario's targeting the off-site residences, the on-site commercial workers, and the on-site construction workers based on the current use of the property (commercial). The risk assessment concluded that the "groundwater to indoor air" pathway is the only exposure route through which the concentrations could exceed the site specific target levels (SSTL's) and hence groundwater cleanup in the area around MW-5 would be required.

This Department is aware that ORC's (oxygen releasing compounds) have been injected into the boreholes between May and June 1997 with the intention of reducing the TPH concentrations in the eastern portion of the underground storage tank area. This Department has received the groundwater monitoring report dated, October 7, 1997 which indicates a significant decrease in the petroleum hydrocarbon concentrations in monitoring well, MW-5. Based on these results, this Department recommends at least two more quarters of monitoring prior to evaluating the site for closure.

If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

  
Madhulla Logan

Hazardous Material Specialist

C: **Robert Kitay**, Aqua Science Engineering, Inc, 2411 Old Crow Canyon road, #4  
San Ramon, CA - 94583  
**Christopher Palmer**, 1345 Kimberly Drive, San Jose, CA - 95118

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

LOP# 1038  
folder C



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

May 9, 2001

**STID 1038**

Mr. Mohammed Mashhoon  
Zima Center Inc.  
1751 Jefferson Street  
Oakland, CA 94612

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA 94619**

Dear Mr. Mashhoon:

I have received the "Interim Remedial Action Plan" dated May 3, 2001, submitted by Mr. Tim Cook of W.A. Craig, Inc. regarding the above referenced site. Per this report the soil and groundwater samples revealed high concentrations of contaminants. TB-6 was the most significant soil sample at 10 feet, which revealed 840ppm, 12ppm, and 14ppm of TPH-g, MTBE, and Benzene respectively. However, the highest TPH-g level was detected at 5 feet for soil sample TB-3.

There were 44,000ppb, 52,000ppb, <1700ppb, and 390ppb of TPH-g, MTBE, TAME, and Benzene in water sample TB-3. However, the highest Benzene level was detected in TB-1 at 880ppb.

I concur with the proposal as indicated within this report. However, please submit a copy of the mentioned evaluated risk assessment to this office along with the copy of approval letter by my former colleague, Madhulla Logan, dated August 2, 1997, which approves Site Specific Threshold Levels (SSTLs) using Risk Based Corrective Action (RBCA) assessment. **Please submit to this office a copy of this letter along with a copy of Risk Based Corrective Action (RBCA) assessment**

Additionally I concur with the Risk-Based Screening Level (SSTL) of 100 mg/kg for TPH-g per San Francisco Bay Regional Water Quality Control Board (RWQCB), table A.

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

Sincerely,

A handwritten signature in black ink, consisting of a stylized initial 'A' followed by a long horizontal line.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

STID  
1038

**W.A. CRAIG, INC.**  
Environmental Consulting & Construction  
6940 Tremont Rd.  
Dixon, CA 95620  
(707) 693-2929  
fax (707) 693-2922

# Fax

**To:** Amir Ghoulani **From:** Tim Cook

---

**Fax:** (510) 337-9335 **Pages (including this one):** 23

---

**Phone:** **Date:** May 3, 2001

---

**Re:** Interim Remedial Action Plan, 2951 High Street, Oakland

---

Urgent     For Review     Please Comment     Please Reply     Please Recycle

---

● **Comments:**

Amir,

Attached is the Interim Remedial Action Plan for soil excavation at the subject site. Please call me at (707) 693-2929 if you have questions or comments.

Regards,

Tim Cook, PE  
Principal Engineer

**W. A. CRAIG, INC.**

Environmental Contracting and Consulting

6940 Tremont Road

Dixon, California 95620

Contractor and Hazardous Substances License #455752

e-mail: tech@wacraig.com

(800) 522-7244

Dixon (707) 693-2929

Napa (707) 252-3353

Fax: (707) 693-2922

**May 3, 2001****Project No. 3936**

Mr. Aziz Kandahari  
Himalaya Trading Company  
2951 High Street  
Oakland, CA 94619

Subject: **Interim Remedial Action Plan**  
**2951 High Street**  
**Oakland, California**

*Handwritten:*  
5/2/01  
AC

Dear Mr. Kandahari:

At your request, W.A. Craig, Inc. collected soil samples from the site on two occasions to confirm the presence of petroleum hydrocarbons and delineate their extent. Six soil samples were collected from the bottom of a pipe trench on February 28, 2001. Six soil borings were advanced on April 26, 2001. Soil samples were collected from 5 feet and 10 feet below grade (fbg). A grab groundwater sample was also collected from borings where groundwater was encountered. Alameda County Health Care Services approved the work plan for the installation of nine soil borings in a letter dated April 25, 2001. As of this date, six of the nine borings have been installed and sampled. Results from the remaining borings will be submitted as an appendix to this report. Sample locations are presented on the attached Figure 1. The results of the February 28, 2001 investigation was submitted previously in a report dated March 9, 2001 and are included in this Interim Remedial Action Plan (IRAP) to provide a summary of our present understanding of site conditions.

Gasoline was present in several low spots in the pipe trench. Hydrocarbon odors and detectable photo-ionization readings were recorded in the pipe trench and in all six soil borings. Results of the soil samples are summarized in Table 1. Only two of the six soil borings advanced yielded sufficient groundwater to collect water samples. Soil encountered in the boring was primarily clayey gravel with some low-plasticity clay observed above 5 fbg. Results of the groundwater samples are summarized in Table 2. Complete laboratory analytical reports are in Attachment A. Boring logs from the six soil borings are in Attachment B.

Interim Remedial Action Plan  
2951 High Street  
Oakland, California

May 3, 2001  
Project No. 3936  
Page 2

Soil and groundwater sample results were compared to Site Specific Threshold Levels (SSTLs) established in the *Addendum to Risk Assessment for Zima Center Corporation, 2951 High Street, Oakland, August 22, 1997*. In addition to the SSTLs previously established in the risk assessment, we propose to use a SSTL of 100 mg/kg for TPH-g. This cleanup level was established by the San Francisco Bay Regional Water Quality Control Board (RWQCB) for surface soils ( $\leq 3$  m fbg) where groundwater is a current or potential source of drinking water (RWQCB, 2000).

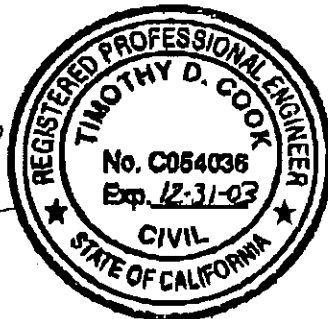
Based on field observations and the laboratory results, there has been an uncontrolled release of petroleum hydrocarbons from the pump dispenser area in front of the store. Groundwater samples from borings TB-1 and TB-3 yielded MtBE, benzene, toluene, ethylbenzene and xylenes significantly in excess of the SSTLs. The approximate extent of soils above the SSTLs is presented on Figure 1. We estimate that approximately 800 tons of soil from the pump dispenser area will require excavation and offsite disposal. This estimate does not include soil from the existing underground storage tank pit.

The soil will be handled and transported as non-RCRA waste and will be disposed of at the B&J Landfill in Vacaville, California. A report of remedial activities including verification soil samples, non-hazardous waste manifests, weight tickets, recommendations for further groundwater investigation and other supporting documentation will be submitted to the ACHCS upon completion of remedial activities.

A copy of this IRAP is being forwarded to the City of Oakland and Alameda County Health Care Services (ACHCS) for review and approval prior to commencing remedial activities. Please call me at (707) 693-2929 if you have any questions or concerns in regard to this project.

Sincerely,

W.A. Craig, Inc.



Tim Cook, PE  
Principal Engineer

Attachments: Laboratory reports  
Boring Logs

Cc: Amir Gholami, Alameda County Health Care Services  
Hernan Gomez, City of Oakland Fire Services Agency

Table 1. Soil Sample Results

Sample ID	Depth (fbg)	TPH-g	MtBE	TAME	benzene	toluene	ethyl-benzene	xylenes
S-1	3	<b>180</b>	4	0.17	0.14	<b>5.8</b>	<b>3.2</b>	<b>22</b>
S-2	3	71	6.8	0.19	0.20	<b>2.8</b>	1.7	<b>6.2</b>
S-3	3	<b>370</b>	2.9	0.13	0.26	<b>2.1</b>	<b>2.5</b>	<b>15</b>
S-4	3	<b>180</b>	0.3	<0.01	0.12	0.95	1.3	16
S-5	3	<b>3,600</b>	2.3	<1	<b>2.6</b>	<b>15</b>	<b>49</b>	<b>340</b>
S-6	3	<b>730</b>	<b>85</b>	4.7	<b>4.0</b>	<b>49</b>	<b>8.6</b>	<b>62</b>
TB-1	5	<b>320</b>	2.3	<0.050	0.57	1.3	<b>5.4</b>	<b>30</b>
TB-1	10	39	2.4	0.042	0.045	0.20	0.71	<b>3.3</b>
TB-2	5	34	0.38	0.024	0.031	0.19	0.50	1.5
TB-2	10	2.8	3.1	0.071	0.025	0.012	0.14	0.11
TB-3	5	<b>4,000</b>	4.0	<0.5	0.88	<b>21</b>	<b>82</b>	<b>410</b>
TB-3	10	<1	4.3	0.054	<0.005	<0.005	<0.005	0.014
TB-4	5	21	0.24	<0.005	<0.005	0.11	0.032	0.21
TB-4	10	2.9	1.8	0.039	0.010	0.014	0.055	0.056
TB-6	5	9.3	<0.005	<0.005	<0.005	0.052	0.020	<0.005
TB-6	10	<b>840</b>	<b>12</b>	<0.35	<b>14</b>	<b>7.7</b>	<b>17</b>	<b>76</b>
TB-9	5	<1	4.0	0.037	<0.005	<0.005	<0.005	<0.005
TB-9	10	1.1	1.5	0.044	<0.005	<0.005	<0.005	<0.005
SSTL		100	9.7	NE	2.6	1.6	1.9	2.8

Notes: units are mg/kg

Results higher than SSTLs are in bold

SSTLs for all constituents except TPH-g were established in *Addendum to Risk Assessment for Zima Center Corporation, 2951 High Street, Oakland, CA.*, Christopher M. Palmer Consulting Hydrogeologist, August 22, 1997.

The TPH-g action level is a Tier 1 action level established in *Application of Risk-Based Screening Levels and Decision Making to Sites with Impacted Soil and Groundwater (Interim Final)*, California Regional Water Quality Control Board, San Francisco Bay Region, August 2000.

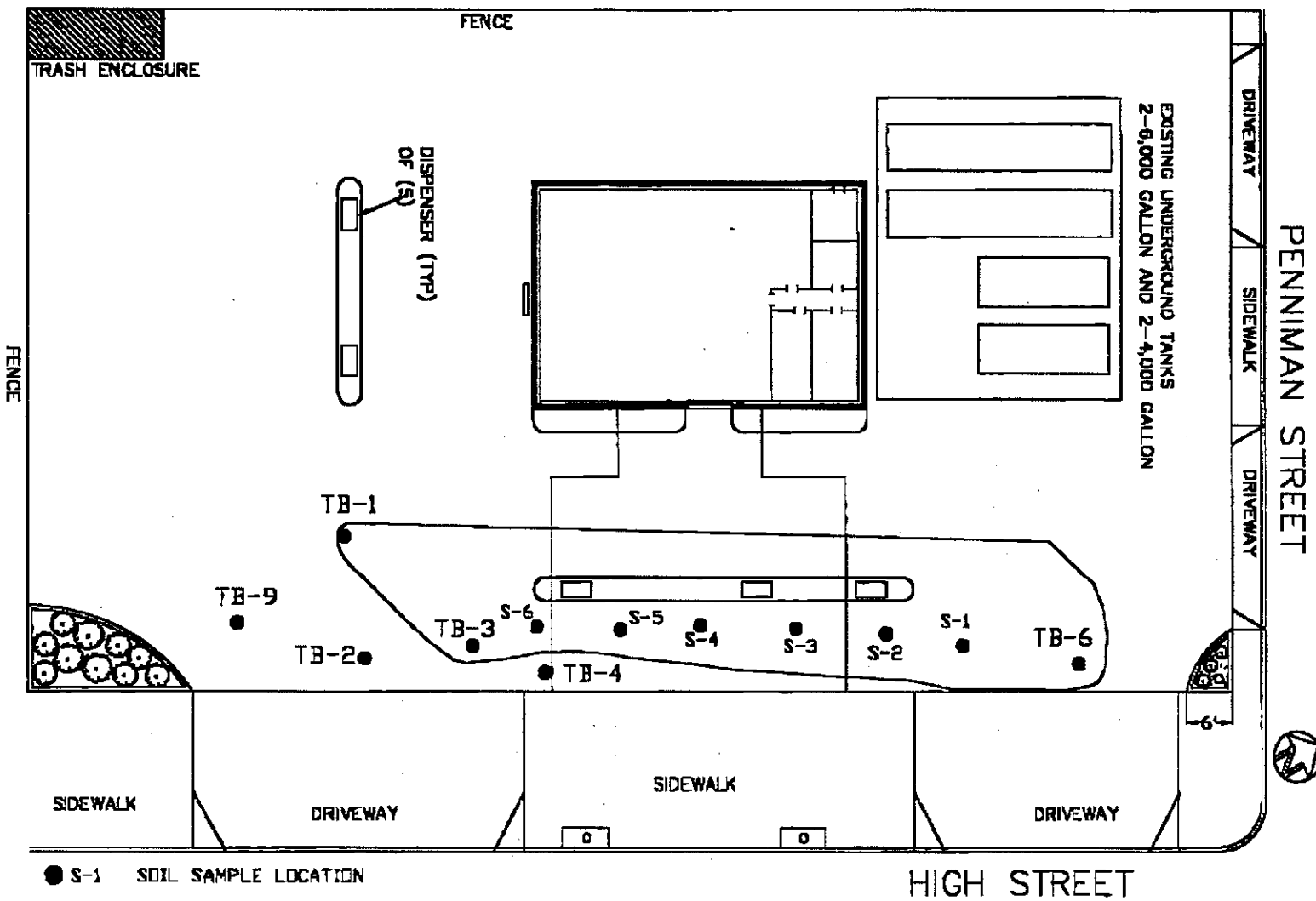
Table 2. Groundwater Sample Results

Sample ID	TPH-g	MtBE	TAME	benzene	toluene	ethyl-benzene	xylenes
TB-1	<b>78,000</b>	<b>37,000</b>	1,500	<b>880</b>	<b>490</b>	<b>3,200</b>	<b>15,000</b>
TB-3	<b>44,000</b>	<b>52,000</b>	<1,700	<b>390</b>	<b>53</b>	<b>2,600</b>	<b>8,900</b>
SSTL	NE	8,400	NE	200	270	180	470

Notes: units are ug/l

Results higher than SSTLs are in bold

SSTLs were established in *Addendum to Risk Assessment for Zima Center Corporation, 2951 High Street, Oakland, CA.*, Christopher M. Palmer Consulting Hydrogeologist, August 22, 1997



● S-1 SOIL SAMPLE LOCATION



**W.A. Craig, Inc.**  
 8940 Tremont Road LIC# 455752  
 Dixon, California 95820-9803  
 PH# (707) 693-2929

**Sample Locations**  
 2951 High Street  
 Oakland California

Project: 3936	Figure:
Date: 05/03/01	1
Scale: 1" = 20'	

**ATTACHMENT A**  
**LABORATORY ANALYTICAL REPORTS**




**McCAMPBELL ANALYTICAL INC.**

 110 2nd Avenue South, #127, Pacheco, CA 94553-5560  
 Telephone: 925-798-1620 Fax: 925-798-1622  
<http://www.mccampbell.com> E-mail: [main@mccampbell.com](mailto:main@mccampbell.com)

W. A. Craig, Inc. 6940 Tremont Road Dixon, CA 95620-9603	Client Project ID: #3936; High Sr.	Date Sampled: 04/26/01
		Date Received: 04/26/01
	Client Contact: Tim Cook	Date Extracted: 04/26/01
	Client P.O:	Date Analyzed: 04/26/01

**Gasoline Range (C6-C12) Volatile Hydrocarbons as Gasoline\*, with Methyl tert-Butyl Ether\* & BTEX\***

EPA methods 5030, modified 8015, and 8020 or 602; California RWCCR (SF Bay Region) method GCFID(5030)

Lab ID	Client ID	Matrix	TPH(g)*	MTBE	Benzene	Toluene	Ethyl-benzene	Xylenes	% Recovery Surrogate
66248	B9 @ 5'	S	ND	3.2	ND	ND	ND	ND	104
66249	B9 @ 10'	S	1.1.b.j	2.0	ND	ND	ND	ND	---
66250	B2 @ 5'	S	34.a	0.48	0.031	0.19	0.50	1.5	---
66251	B2 @ 10'	S	2.8.a	2.6	0.025	0.012	0.14	0.11	---
66252	B1 @ 5'	S	320.a	ND<3.5	0.57	1.3	5.4	30	104
66253	B1 @ 10'	S	39.a	1.8	0.045	0.20	0.71	3.3	---
66254	B1	W	78,000.a.i	32,000	880	490	3200	15,000	104
66255	B3 @ 5'	S	4000.b.j	ND<10	0.88	21	82	410	---
66256	B3 @ 10'	S	ND	3.1	ND	ND	ND	0.012	103
66257	B3	W	44,000.a.i	47,000	390	53	2600	8900	103
66258	B4 @ 5'	S	21.b.j	0.38	ND	0.11	0.032	0.21	---
66259	B4 @ 10'	S	2.9.a	1.8	0.010	0.014	0.055	0.056	---
66260	B6 @ 5'	S	9.3.g.j	ND	ND	0.052	0.020	ND	100
66261	B6 @ 10'	S	840.a	14	14	7.7	17	76	108
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit	W		50 ug/l.	5.0	0.5	0.5	0.5	0.5	
	S		1.0 mg/kg	0.05	0.005	0.005	0.005	0.005	

\* water and vapor samples are reported in ug/L, wipe samples in ug/wipe, soil and sludge samples in mg/kg, and all TCLP and SPLP extracts in ug/L

\* cluttered chromatogram; sample peak coelutes with surrogate peak

The following descriptions of the TPH chromatogram are cursory in nature and McCampbell Analytical is not responsible for their interpretation: a) unmodified or weakly modified gasoline is significant; b) heavier gasoline range compounds are significant (aged gasoline?); c) lighter gasoline range compounds (the most mobile fraction) are significant; d) gasoline range compounds having broad chromatographic peaks are significant; biologically altered gasoline?; e) TPH pattern that does not appear to be derived from gasoline (?); f) one to a few isolated peaks present; g) strongly aged gasoline or diesel range compounds are significant; h) lighter than water immiscible stream is present; i) liquid sample that contains greater than ~5 vol. % sediment; j) no recognizable pattern.

DHS Certification No. 1644

Edward Hamilton, Lab Director



McCAMPBELL ANALYTICAL INC.

110 2nd Avenue South, #D7, Pacheco, CA 94553-9560  
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<http://www.mccampbell.com> E-mail: [main@mccampbell.com](mailto:main@mccampbell.com)

W. A. Craig, Inc. 6940 Trueman Road Dixon, CA 95620-9603	Client Project ID: #3936; High St.			Date Sampled: 04/26/01		
	Client Contact: Tim Cook			Date Received: 04/26/01		
	Client P.O.:			Date Extracted: 04/26-04/30/01		
				Date Analyzed: 04/26-04/30/01		
EPA method 8260 modified						
<b>Seven Oxygenated Volatile Organics By GC/MS</b>						
Lab ID	66248	66249	66250	66251	Reporting Limit	
Client ID	B9 @ 5'	B9 @ 10'	B2 @ 5'	B2 @ 10'		
Matrix	S	S	S	S	S	W
Compound	Concentration*				ug/kg	ug/l
Di-isopropyl Ether (DIPE)	ND<25	ND<25	ND	ND<25	5.0	1.0
Ethyl tert-Butyl Ether (ETBE)	ND<25	ND<25	ND	ND<25	5.0	1.0
Methyl tert-Butyl Ether (MTBE)	4000	1500	380	3100	5.0	1.0
tert-Amyl Methyl Ether (TAME)	37	44	24	71	5.0	1.0
tert-Butanol	ND<125	ND<125	ND	ND<125	25	5.0
Methanol	ND<12,500	ND<12,500	ND	ND<12,500	2500	500
Ethanol	ND<1250	ND<1250	ND	ND<1250	250	50
<b>Surrogate Recoveries (%)</b>						
Dibromofluoromethane	81	84	84	109		
Comments:						
<p>* water samples are reported in ug/L, soil and sludge samples in ug/kg, wipes in ug/wipe and all TCLP / STLC / SPLP extracts in ug/L          ND means not detected above the reporting limit. N/A means surrogate not applicable to this analysis          (h) lighter than water immiscible when is present; (i) liquid sample that contains greater than ~5 vol. % sediment; (j) sample diluted due to high organic content</p>						

DHS Certification No. 1644

Edward Hamilton, Lab Director



McCAMPBELL ANALYTICAL INC.

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 Telephone: 925-798-1620 Fax: 925-798-1622  
<http://www.mccampbell.com> E-mail: [main@mccampbell.com](mailto:main@mccampbell.com)

W. A. Craig, Inc. 6940 Tremont Road Dixon, CA 95620-9603	Client Project ID: #3936: High St.	Date Sampled: 04/26/01
	Client Contact: Tim Cook	Date Received: 04/26/01
	Client P.O.:	Date Extracted: 04/26-04/30/01
		Date Analyzed: 04/26-04/30/01

EPA method 8260 modified

## Seven Oxygenated Volatile Organics By GC/MS

Lab ID	66252	66253	66254	66255	Reporting Limit	
	Client ID	B1 @ 5'	B1 @ 10'	B1	B3 @ 5'	S
Matrix	S	S	W	S	S	W
Compound	Concentration*				ug/kg	ug/l
Di-isopropyl Ether (DIPE)	ND<50	ND<10	ND<1000	ND<500	5.0	1.0
Ethyl tert-Butyl Ether (ETBE)	ND<50	ND<10	ND<1000	ND<500	5.0	1.0
Methyl tert-Butyl Ether (MTBE)	2300	2400	37.000	4000	5.0	1.0
tert-Amyl Methyl Ether (TAME)	ND<50	42	1500	ND<500	5.0	1.0
tert-Butanol	ND<250	ND<50	ND<5000	ND<2500	25	5.0
Methanol	ND<25,000	ND<5000	ND<500,000	ND<250,000	2500	500
Ethanol	ND<2500	ND<500	ND<50,000	ND<25,000	250	50

## Surrogate Recoveries (%)

Surrogate	66252	66253	66254	66255
Dibromofluoromethane	98	109	95	94
Comments:			i	

\* water samples are reported in ug/L, soil and sludge samples in ug/kg, wipes in ug/wipe and all TCLP / STLC / SPLP extracts in ug/l.  
 ND means not detected above the reporting limit, N/A means surrogate not applicable to this analysis

(h) lighter than water immiscible sheen is present; (i) liquid sample that contains greater than ~5 vol. % sediment; (j) sample diluted due to high organic content

DHS Certification No. 1644

*Edward Hamilton*  
 Edward Hamilton, Lab Director



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W. A. Craig, Inc. 6940 Tremont Road Dixon, CA 95620-9603	Client Project ID: #3936: High St.				Date Sampled: 04/26/01	
	Client Contact: Tim Cook				Date Received: 04/26/01	
	Client P.O:				Date Extracted: 04/26-04/30/01	
					Date Analyzed: 04/26-04/30/01	
EPA method 8260 modified						
Seven Oxygenated Volatile Organics By GC/MS						
Lab ID	66256	66257	66258	66259	Reporting Limit	
Client ID	B3 @ 10'	B3	B4 @ 5'	B4 @ 10'		
Matrix	S	W	S	S	S	W
Compound	Concentration*				ug/kg	ug/L
Di-isopropyl Ether (DIPE)	ND<25	ND<1700	ND	ND<10	5.0	1.0
Ethyl tert-Butyl Ether (ETBE)	ND<25	ND<1700	ND	ND<10	5.0	1.0
Methyl tert-Butyl Ether (MTBE)	4300	52,000	240	1800	5.0	1.0
tert-Amyl Methyl Ether (TAME)	54	ND<1700	ND	39	5.0	1.0
tert-Butanol	ND<125	ND<8500	91	ND<50	25	5.0
Methanol	ND<12,500	ND<850,000	ND	ND<5000	2500	500
Ethanol	ND<1250	ND<85,000	ND	ND<500	250	50
Surrogate Recoveries (%)						
Dibromofluoromethane	84	95	112	84		
Comments:						
<p>* water samples are reported in ug/L, soil and sludge samples in ug/kg, wipes in ug/wipe and all TCLP / STEC / SPLP extracts in ug/L          ND means not detected above the reporting limit; N/A means surrogate not applicable to this analysis          (h) lighter than water immiscible shown is present; (i) liquid sample that contains greater than ~5 vol. % sediment; (j) sample diluted due to high organic content</p>						

DHS Certification No. 1644

 Edward Hamilton, Lab Director



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W. A. Craig, Inc. 6940 Tremont Road Dixon, CA 95620-9603	Client Project ID: #3936; High St.	Date Sampled: 04/26/01
	Client Contact: Tim Cook	Date Received: 04/26/01
	Client P.O.:	Date Extracted: 04/26-04/30/01
		Date Analyzed: 04/26-04/30/01

EPA method 8260 modified

## Seven Oxygenated Volatile Organics By GC/MS

Lab ID	66260	66261	Reporting Limit		
			S	W	
Client ID	B6 @ 5'	B6 @ 10'			
Matrix	S	S			
Compound	Concentration*			ug/kg	ug/L
	DI-isopropyl Ether (DIPE)	ND	ND<350	5.0	1.0
Ethyl tert-Butyl Ether (ETBE)	ND	ND<350	5.0	1.0	
Methyl tert-Butyl Ether (MTBE)	ND	12,000	5.0	1.0	
tert-Amyl Methyl Ether (TAME)	ND	ND<350	5.0	1.0	
tert-Butanol	ND	ND<1750	25	5.0	
Methanol	ND	ND<175,000	2500	500	
Ethanol	ND	ND<17,500	250	50	

## Surrogate Recoveries (%)

Dibromofluoromethane	107	94		
Comments:				

\* water samples are reported in ug/L, soil and sludge samples in ug/kg, wipes in ug/wipe and all TCLP / STLC / SPLP extracts in ug/L

ND means not detected above the reporting limit; N/A means surrogate not applicable to this analysis

(h) lighter than water immiscible sheen is present; (i) liquid sample that contains greater than ~5 vol. % sediment; (j) sample diluted due to high organic content

DHS Certification No. 1644

 Edward Hamilton, Lab Director


**McCAMPBELL ANALYTICAL INC.**

 110 2nd Avenue South, #D7, Pacheco, CA 94553-5560  
 Telephone: 925-798-1620 Fax: 925-798-1622  
<http://www.mccampbell.com> E-mail: [main@mccampbell.com](mailto:main@mccampbell.com)

W. A. Craig, Inc. 6940 Tremont Road Dixon, CA 95620-9603	Client Project ID: #3936; High St.	Date Sampled: 04/26/01
		Date Received: 04/26/01
	Client Contact: Tim Cook	Date Extracted: 04/26-04/30/01
	Client P.O:	Date Analyzed: 04/26-04/30/01

**Ethylene Dibromide (1,2-Dibromoethane) and 1,2-Dichloroethane (1,2-DCA)**

EPA method 8260

Lab ID	Client ID	Matrix	FDB	1,2-DCA	% Recovery Surrogate
66248	B9 @ 5'	S	ND<25j	ND<25	81
66249	B9 @ 10'	S	ND<25j	ND<25	84
66250	B2 @ 5'	S	ND	ND	84
66251	B2 @ 10'	S	ND<25j	ND<25	109
66252	B1 @ 5'	S	ND<50j	ND<50	98
66253	B1 @ 10'	S	ND<10j	ND<10	81
66254	B1	W	ND<1000j,i	ND<1000	95
66255	B3 @ 5'	S	ND<500j	ND<500	94
66256	B3 @ 10'	S	ND<25j	ND<25	81
66257	B3	W	ND<1700j,i	ND<1700	95
66258	B4 @ 5'	S	ND	ND	112
66259	B4 @ 10'	S	ND<10j	ND<10	84
66260	B6 @ 5'	S	ND	ND	107
66261	B6 @ 10'	S	ND<350j	ND<350	94
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	1.0 ug/l.	1.0	
		S	5.0 ug/kg	5.0	

\* water and vapor samples are reported in ug/L, soil and sludge samples in ug/kg, wipes in ug/wipe and all TCLP / SPLP extracts in ug/L  
 h) lighter than water immiscible liquid is present; i) liquid sample that contains greater than ~5 vol. % sediment; j) sample diluted due to high organic content.

DHS Certification No. 1644

Edward Hamilton, Lab Director

**McCAMPBELL ANALYTICAL INC.**110 2nd Avenue South, #D7, Pacheco, CA 94553-5560  
Telephone: 925-798-1620 Fax: 925-798-1622  
<http://www.mccampbell.com> E-mail: [main@mccampbell.com](mailto:main@mccampbell.com)**INVOICE FOR ANALYTICAL SERVICES**

Attention: Accounts Payable

W. A. Craig, Inc. 6940 Tremont Road Dixon, CA 95620-9603	Client Project ID: #3936; High St.	Date Sampled: 04/26/01
	Client Contact: Tim Cook	Date Received: 04/26/01
	Client P.O.:	Date Extracted: 04/26/01
		Date Analyzed: 04/26/01

Billing Date: 05/03/2001

Invoice #25615

Number of Samples	Analysis	TAT	Unit Price	Sub-Total
12	TPH(g)-BTEX MTBE	48hr	\$67.50	\$810
2	TPH(g)-BTEX MTBE	5d	\$45	\$90
0	Oil & Grease (418.1 or 5520 or 1664)	5d	\$45	\$0
0	EPA 601 / 8010 / EDB	5d	\$60	\$0
0	EPA 624 / 8240 / 8260	5d	\$125	\$0
2	7 Fuel Oxygenate + Lead Scavengers By EPA 8260	5d	\$90	\$180
12	7 Fuel Oxygenate + Lead Scavengers By EPA 8260	48hr	\$135	\$1620
0	EPA 625 / 8270	5d	\$180	\$0
0	PCB / Chlorinated Pesticides, EPA 608 / 8080	5d	\$50 / \$75	\$0
0	RCI	5d	\$70	\$0
0	TSS	5d	\$20	\$0
0	13 Priority Pollutant Metals	5d	\$110	\$0
0	RCRA 8 Metals	5d	\$80	\$0
0	5 LUFT Metals	5d	\$50	\$0
0	Individual Metal (AA Flame, Furnace, ICP)	5d	\$15	\$0
0	Organic Lead	5d	\$55	\$0
0	STLC Extraction	5d	\$50	\$0
0	ZHE TCLP Extraction	5d	\$100	\$0
0	Semi-Volatile TCLP Extraction	5d	\$50	\$0
0		Subbed	\$0	\$0
<b>INVOICE TOTAL : \$2700</b>				

Please include the invoice number(s) with your check and remit to:

McCampbell Analytical Inc.  
110 2nd Avenue South, #D7  
Pacheco, CA 94553-5560

Terms are net 30 days from the billing date. After this period 1.5% interest per month will be charged. Overdue accounts are responsible for all legal and collection fees. If you have any questions about billing please contact Accounts Receivable at McCampbell Analytical.

**McCAMPBELL ANALYTICAL INC.**  
 110 2<sup>nd</sup> AVENUE SOUTH, RD7  
 PACHECO, CA 94553-5560  
 Telephone: (925) 798-1620 Fax: (925) 798-1622

25615 JWC 489  
**CHAIN OF CUSTODY RECORD**  
**TURN AROUND TIME**  RUSH  24 HOUR  48 HOUR  5 DAY

Report To: Tom Coak Bill To: # 2736 C# 4122101  
 Company: W. A. Craig  
 6940 Tremont Road  
 Dixon, CA 95620-9603  
 Tele: (707) 693-2929 Fax: (707) 693-2922  
 Project #: 2736 Project Name: Helen St.  
 Project Location: Dixon  
 Sampler Signature: Sam O'Hedry

SAMPLE ID	LOCATION	SAMPLING		# Containers	Type Containers	MATRIX					METHOD PRESERVED											Other	Comments								
		Date	Time			Water	Soil	Air	Sludge	Other	Ice	HCL	HNO <sub>3</sub>	Other	BTEX & TPH as Gas (40/60/200) - ONLY MATRIX	TPH as Diesel (801.5)	Total Petroleum-Oil & Grease: (5250 EA/PY/ALP)	Total Petroleum Hydrocarbons (11.8.1)	EPA 601 / 8010	BTEX ONLY (EPA 602 / 8020)	EPA 608 / 8080			EPA 608 / 8080 PCO'S ONLY	EPA 821 / 8270 <i>(6) 2736 Helen St. 2736 Water 5 containers</i>	PALF / 8270 / EPA by EPA 821 / PALF / 8270	CAM-17 Metals	LUFT 5 Metals	Lead (23407/21/22/23/24)	Pb	
B <sub>1</sub> 5'		04/24				Y					Y				X																66248
B <sub>2</sub> 10'						X					Y				X																66249
<del>B<sub>3</sub> 5'</del>						X					Y				X																CANCEL
B <sub>2</sub> 5'						Y					Y				X																66250
B <sub>2</sub> 10'						X					Y				X																66251
<del>B<sub>1</sub> 5'</del>						Y					Y				X																CANCEL
B <sub>1</sub> 10'						X					Y				X																66251
<del>B<sub>1</sub> 5'</del>						Y					Y				X																66252
B <sub>3</sub> 5'						X					Y				X																66253
B <sub>2</sub> 10'						X					Y				X																66254
B <sub>3</sub>						X					Y				X																66254
* - <del>leaf Box</del>											Y				X																66255

Relinquished By: Sam O'Hedry Date: 04/24/01 Time: 5:53 Received By: W.A. Craig V. Mad  
 Relinquished By: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received By: \_\_\_\_\_  
 Relinquished By: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received By: \_\_\_\_\_

Remarks: \_\_\_\_\_  
 VOAS C&G METALS OTHER  
 ICE?  PRESERVATION  
 GOOD CONDITION  APPROPRIATE  
 HEAD SPACE ABSENT  CONTAINERS

\* NOT RECEIVED



# KUSH

25615

## McCAMPBELL ANALYTICAL INC.

110 2<sup>ND</sup> AVENUE SOUTH, #07  
PACHECO, CA 94531-3560

Telephone: (925) 798-1620

Fax: (925) 798-1622

## CHAIN OF CUSTODY RECORD

TURN AROUND TIME

RUSH 24 HOUR 48 HOUR 5 DAY

Report To: Tim Crowl Bill To: # 3936 on 5/24/01  
Company: W. A. Craig  
6940 Tremont Road  
Dixon, CA 95620-9603  
Tele: (707) 693-2929 Fax: (707) 693-2922  
Project #: 3936 Project Name: WELL ST.  
Project Location: Onland  
Sampler Signature: S. O'Halley

### Analysis Request

Other Comments

SAMPLE ID	LOCATION	SAMPLING		# Containers	Type Containers	MATRIX					METHOD PRESERVED						Comments																				
		Date	Time			Water	Soil	Air	Sludge	Other	Ice	HCl	HNO <sub>3</sub>	Other	STEX & TPH in Gas (602/6020 - 8015) MATRIX			TPH in Diesel (8015)	Total Petroleum Oil & Grease (5570 8027/8085)	Total Petroleum Hydrocarbons (411.1)	EPA 601 / 8010	STEX ONLY (EPA 602 / 8020)	EPA 808 / 8080	EPA 808 / 8080 PCB'S ONLY	EPA 821 / 8240 <u>PAH's</u>	EPA 825 / 8270	PAH's / PNA's by EPA 829 / 8295 / 8299 / 8310	CAM-17 Metals	LIPT 5 Metals	Lead (7240742/239,24010)	RCI						
9405'		5/24					X					X			X																						66258
74010'							X					X			X																						66259
6405'							X					X			X																						5-24 5-24
64010'							X					X			X																						66260
																																					66261

Relinquished By: <u>S. O'Halley</u>	Date: <u>5/24</u>	Time: <u>5:53</u>	Received By: <u>Always</u>
Relinquished By:	Date:	Time:	Received By:
Relinquished By:	Date:	Time:	Received By:

Remarks:

ICE#  PRESERVATION   
 GOOD CONDITION  APPROPRIATE CONTAINERS   
 HEAD SPACE ABSENT

05/03/01 16:18 FAX 707 693 2922 W A CRAIG INC  
 ant' By: McCampbell Analytical, Inc. 1 925 798 4812; May-1 4:44PM; Page 3/10

**ATTACHMENT B**  
**BORING LOGS**

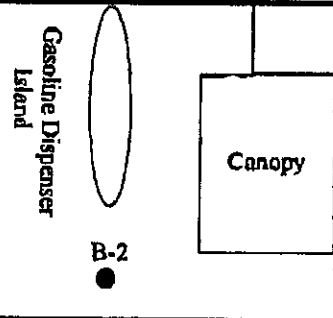

### DRILLING LOG










Gasoline Dispenser Island  B-1 ●  ●	Canopy	<b>W. A. Craig, Inc.</b> Environmental Contracting and Consulting		6940 Tremont Road Dixon, California 95620 Cal License #455752	(707) 693-2929 FAX (707) 693-2922
		PROJECT: 2951 High Street	PROJECT number 3936	BORING NO: B-1	
		DRILLING CONTRACTOR: Gregg Drilling	START TIME: 12:00 pm	DATE: 04/26/01	
		DRILLING METHOD: Direct-Push	FINISH TIME: 12:35 pm	TOTAL DEPTH: 10'	DEPTH TO WATER:
		SAMPLER:	SCREEN INT:	CASING:	
High Street	HAMMER WEIGHT:	DROP:	FIELD GEOLOGIST: O'Grady		

DEPTH	SAMPLE No	SAMPLE	BLOWNS/ 0.5 FOOT	Bored PID	BORING/WELL CONSTRUCTION	LITHOLOGIC LOG	LITHOLOGIC DESCRIPTION <small>Description, Color, Density, Moisture</small>
5	B-1 @ 5'			20	▽		AC pavement with Class II AB
10	B-1 @ 10'			20			(CL) Clay, green, moist-wet, medium plasticity, cohesive. Strong odor/mottling present.
10				20			(GC) Gravel/medium-grained sand/clay, moist, brown/green, low plasticity, cohesive. Strong odor/mottling.
10				20			(GC) Moist-wet, no plasticity, somewhat cohesive. Strong odor/mottling.
15						TD 10'	
20							
25							Soil sampled @ 12:17 and 12:29 pm Water sampled @ 4:27 pm.
30							
35							
40							

Checked by: \_\_\_\_\_

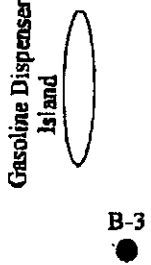

# BORING LOG

Gasoline Dispenser Island  B-2 High Street	 <b>W. A. Craig, Inc.</b> Environmental Contracting and Consulting		6240 Tremont Road Dixon, California 95620 Cal License #455752		(707) 693-2929 FAX (707) 693-2922
	<b>PROJECT:</b> 2951 High Street		<b>PROJECT#</b> 3936	<b>BORING NO:</b> B-2	
	<b>DRILLING CONTRACTOR:</b> Gregg Drilling & Testing		<b>START TIME:</b> 10:35 am	<b>DATE:</b> 04/26/01	
	<b>DRILLING METHOD:</b> Direct-Push		<b>TOTAL DEPTH:</b> 22'	<b>DEPTH TO WATER:</b>	
	<b>SAMPLER:</b>		<b>SCREEN INT.:</b>	<b>CASING:</b>	
<b>HAMMER WEIGHT:</b>		<b>DROP:</b>	<b>FIELD GEOLOGIST:</b> O'Grady		

DEPTH	SAMPLE No	SAMPLE BLOWS/2.5 FOOT	DEPTH (feet)	BORING/WELL CONSTRUCTION	LITHOLOGIC LOG	LITHOLOGIC DESCRIPTION Description, Color, Density, Moisture
0			7			AC Pavement over Class II AB
5	B-2 @ 5'		20			(CL) Clay/silt, dark grey, moist, cohesive, medium plasticity. Strong petroleum odor/mottling.
10	B-2 @ 10'		17			(GC) Gravel/clay/sand, brown, damp, cohesive, compacted, no plasticity. Some petroleum odor/ mottling.
15			12			(GC) Clayey gravel, brown, damp, stiff, cohesive, compacted, no-low plasticity. Faint odor/ no mottling.
20			4			(GC) Clayey gravel
25						(GC) Gravelly clay, light brown-brown, damp-moist, low plasticity, stiff, cohesive, compacted. No petroleum odor/some mottling.
30						No recovery
35						
40						
					TD 22'	
						Soil sampled @ 10:51 and 11:01 am.

Checked by: TDC

# BORING LOG


Gasoline Dispenser Island  B-3 High Street	Main Building	 <b>W. A. Craig, Inc.</b> Environmental Contracting and Consulting		6940 Trenton Road Dixon, California 95620 Cal License #455752	(707) 693-2929 FAX (707) 693-2922	
	Canopy	PROJECT: 2951 High Street		PROJECT number 3936	BORING NO: B-3	
		DRILLING CONTRACTOR: Gregg Drilling & Testing		START TIME: 1:10 pm	DATE: 04/26/01	
		DRILLING METHOD: Direct-Push		FINISH TIME: 1:45 pm	DEPTH TO WATER: 4'	
		TOTAL DEPTH: 10'		SCREEN INT.:		CASING:
		SAMPLER:		HAMMER WEIGHT:		DROP:

DEPTH	SAMPLE No	SAMPLE BLOWS LF DDOT	FID (ppm)	BORING/WELL CONSTRUCTION	LITHOLOGIC LOG	LITHOLOGIC DESCRIPTION <small>Description, Color, Density, Moisture</small>
5	B-3 @ 5'	█	20	▽		AC Pavement over Class II AB
10	B-3 @ 10'	█	20			(CL) Silty clay-some gravel, green/brown, damp-wet, medium plasticity, cohesive. Strong petroleum odor/mottling.
						(GC) Clayey gravels, brown, moist-wet, no plasticity, cohesive. Strong petroleum odor/mottling.
						TD 10'
15						
20						
25						
30						
35						
40						

Soil sampled @ 1:23 and 1:39 pm.  
Water sampled @ 4:33 pm.

Checked by: TDC

# BORING LOG


Main Building Canopy Former Gasoline Island Sidewalk High Street	 <b>W. A. Craig, Inc.</b> Environmental Contracting and Consulting		6940 Tremont Road Dixon, California 95620 Cal License #455752		(707) 693-2929 FAX (707) 693-2922	
	<b>PROJECT:</b> 2951 High Street		<b>PROJECT#</b> 3936		<b>BORING NO:</b> B-4	
<b>DRILLING CONTRACTOR:</b> Gregg Drilling & Sampling		<b>START TIME:</b> 2:30 pm		<b>DATE:</b> 04/26/01		
<b>DRILLING METHOD:</b> Direct-Push		<b>TOTAL DEPTH:</b> 15'		<b>DEPTH TO WATER:</b>		
<b>SAMPLER:</b>		<b>SCREEN INT.:</b>		<b>CASING:</b>		
<b>HAMMER WEIGHT:</b>		<b>DROP:</b>		<b>FIELD GEOLOGIST:</b> O'Grady		

DEPTH	SAMPLE No	SAMPLER	BLOWS/0.5 FOOT	PID (ppm)	BORING/WELL CONSTRUCTION	LITHOLOGIC LOG	LITHOLOGIC DESCRIPTION <i>Description, Color, Density, Moisture</i>
0							AC pavement with Class II AB
5	B-4 @ 5'	■	20				(CL) Clay/silt-some gravel, green/brown, moist, cohesive, low-medium plasticity. Strong petroleum odor/mottling present.
10	B-4 @ 10'	■	20				(GC) Clayey gravel, brown/green, damp, cohesive, no plasticity. Strong petroleum odor/some mottling. (CL) Silt/vfs/clay, brwn/grn, damp, cohesive, low plasticity. Odor/mottling present.
15			7				(GC) Clayey gravel, brown, dry-damp, cohesive, no plasticity. Strong petroleum odor/mottling. (CL) Vfs/clay, brown, damp, cohesive, stiff, no plasticity. Odor/some mottling.
20							
25							
30							
35							
40							

Soil sampled @ 2:50 and 3:07 pm.

Checked by: TDC

# BORING LOG

Main Building	 <b>W. A. Craig, Inc.</b> Environmental Contracting and Consulting		6940 Tremont Road Dixon, California 95620 Cal License #455752		(707) 693-2929 FAX (707) 693-2922	
			PROJECT: 2951 High Street		PROJECT number 3936	BORING NO: B-6
Canopy	DRILLING CONTRACTOR: Gregg Drilling & Sampling		START TIME: 3:30 pm		DATE: 04/26/01	
	DRILLING METHOD: Direct-Push		FINISH TIME: 4:05 pm		TOTAL DEPTH: 13'	
	SAMPLER:		SCREEN INT.:		DEPTH TO WATER:	
High Street		HAMMER WEIGHT:	DROP:	FIELD GEOLOGIST: O'Grady		

DEPTH	SAMPLE No	SAMPLE BLOWS/ 63 FOOT	PID (psf)	BORING/WELL CONSTRUCTION	LITHOLOGIC LOG	LITHOLOGIC DESCRIPTION Description, Color, Density, Moisture
0						AC Pavement over Class II AB
5	B-6 @ 5'					(CL) Clay/silt, brown, damp, cohesive, low plasticity. No petroleum odor/mottling.
10	B-6 @ 10'					(CL) Clay/gravel (< .5", subangular), brown, damp, low plasticity, somewhat stiff, cohesive. Petroleum odor/mottling present.
						(GC) Gravel/clay (>1" pebbles), brown, damp-dry, no plasticity, compacted, cohesive. Petroleum odor/mottling present.
						(GC)
15					TD 13'	Refusal @ 13'
20						
25						
30						
35						Soil sampled @ 3:47 and 4:03 pm.
40						

Checked by: TDC

# BORING LOG

	<b>W. A. Craig, Inc.</b> Environmental Contracting and Consulting		6940 Tremont Road Dixon, California 95620 Cal License #455752		(707) 693-2929 FAX (707) 693-2922	
	<b>PROJECT:</b>	2951 High Street	<b>PROJECT#</b>	3936	<b>BORING NO:</b>	B-9
	<b>DRILLING CONTRACTOR:</b>	Gregg Drilling & Testing	<b>START TIME:</b>	8:45 am	<b>DATE:</b>	04/26/01
	<b>DRILLING METHOD:</b>	Direct-Push	<b>FINISH TIME:</b>	9:25 am	<b>TOTAL DEPTH:</b>	22'
	<b>SAMPLER:</b>		<b>SCREEN INT.:</b>		<b>DEPTH TO WATER:</b>	
<b>HAMMER WEIGHT:</b>		<b>DROP:</b>		<b>FIELD GEOLOGIST:</b>	O'Grady	

DEPTH	SAMPLER No	SAMPLE BLOWN BY FOOT	PID (feet)	BORING/WELL CONSTRUCTION	LITHOLOGIC LOG	LITHOLOGIC DESCRIPTION Description, Color, Density, Moisture
0			1			AC Pavement over Class II AB
5	B-9 @ 5'		12			(GC) Clayey gravel, green, wet, no cohesiveness. No petroleum odor/mottling.
10	B-9 @ 10'		7			(CL) Silty clay (larger percentage clay), medium brown, cohesive, medium-high plasticity, moist-slightly wet.
15			0			(CL) Clay/gravel/sand, brown-reddish brown, damp, cohesive, low plasticity. No petroleum odor/mottling present.
20			0			(GC) Clayey gravel-some coarse grained sand, various shades of brown, cohesive, low-medium plasticity, dry-moist. Some petroleum odor/ no mottling
25			0			(GC) Clayey gravel, brown, stiff, damp, compacted, no plasticity, cohesive. No petroleum odor/mottling present.
30			0			(CL) Clay/silt -some gravel present, brown, stiff, dense, cohesive, damp, no-low plasticity. No petroleum odor/mottling present.
40					TD 22'	

Soil sampled @ 9:04 and 9:15 am.

Checked by: TDC



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

April 25, 2001

**STID 1038**

Mr. Mohammed Mashhoon  
Zima Center Inc.  
1751 Jefferson Street  
Oakland, CA 94612

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA 94619**

Dear Mr. Mashhoon:

I am in receipt of a faxed copy of an amendment request, dated April 24, 2001, to "Site Investigation workplan" dated March 26, 2001, submitted by Mr. Tim Cook of W.A. Craig, Inc. regarding the above referenced site.

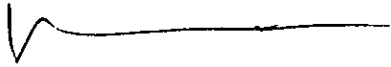
I understand that there will be minor changes proposed as discussed within this report. This change in borings location has been requested to expedite the process rather than obtaining additional permits thorough the City of Oakland. I have reviewed this report and found the changes acceptable as requested. However, per my discussion with Mr. Tim Cook of W.A. Craig, Inc. you need to ensure some soil/groundwater sampling is performed downgradient of both sources including the former and present tanks, scheduled for removal, and the trench area.

Please be aware that pending the result of this investigation, additional soil/groundwater sampling might be deemed necessary in order to delineate the extent of the plume properly.

Please refer to my correspondence dated March 29, 2001 for additional required items, which has to be addressed. This includes submittal of interim remedial action plan to address high levels of MTBE in addition to the use of ORCs, removal of four existing old underground storage tanks thorough City of Oakland Fire Department, and submittal to this office a copy of the letter by Madhula Logan, my former colleague, regarding Risk Based Corrective Action (RBCA) assessment.

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

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

**W.A. CRAIG, INC.**  
**Environmental Consulting & Construction**  
6940 Tremont Rd.  
Dixon, CA 95620  
(707) 693-2929  
fax (707) 693-2922

SHIP 1038

# Fax

**To:** Amir Ghouhani **From:** Tim Cook

---

**Fax:** (510) 337-9335 **Pages (including this one):** 2

---

**Phone:** **Date:** April 24, 2001

---

**Re:** Revisions to Express Mart & Gas Work Plan, 2951 High Street, Oakland

---

Urgent  For Review  Please Comment  Please Reply  Please Recycle

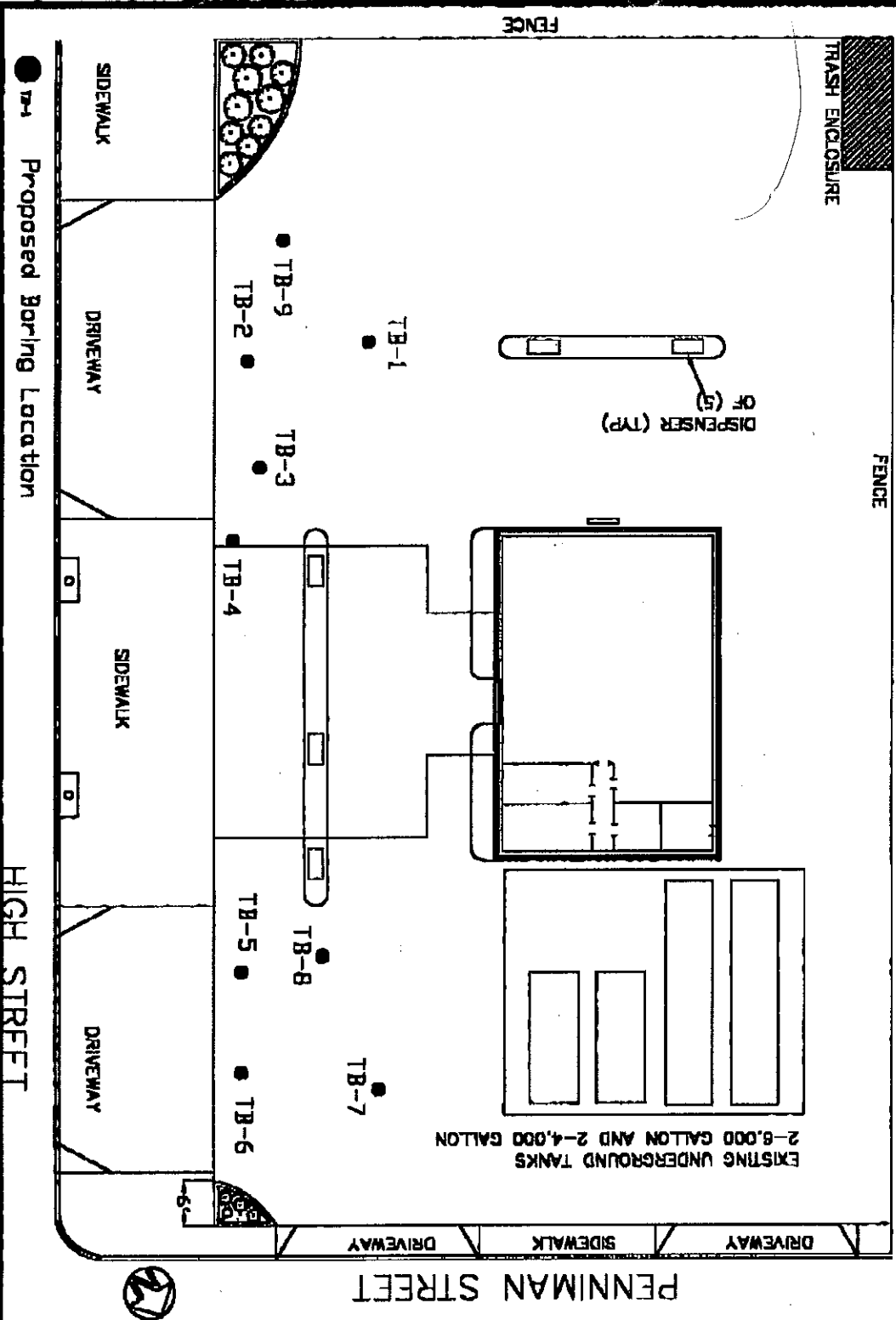
• **Comments:**

Amir,

Yesterday I marked the subject site for USA and noted that several of the proposed boring locations in our March 26, 2001 Site investigation Work Plan were located in the City of Oakland right of way (i.e. sidewalk). Rather than delay the project and obtain the necessary encroachment permit, I moved these borings to the locations shown on the attached figure. Please review this change and incorporate this change into the work plan. We are scheduled to drill these borings on Thursday April 26, 2001. Please call me at (707) 693-2929 if you have questions or comments.

Regards,

Tim Cook, PE  
Principal Engineer



**W.A. Craig, Inc.**

8940 Trentmont Road  
 Dixon, California 95620-9603  
 PH# (707) 693-2929

**Proposed Soil Boring Locations**

2951 High Street  
 Oakland California

Project: 3936	Figure: 4
Date: 3/27/01	
Scale: 1" = 20'	

**W.A. CRAIG, INC.**  
**Environmental Consulting & Construction**  
**6940 Tremont Rd.**  
**Dixon, CA 95620**  
**(707) 693-2929**  
**fax (707) 693-2922**

# Fax

**To:** Amir Ghouliani **From:** Tim Cook

---

**Fax:** (510) 337-9335 **Pages (including this one):** 2

---

**Phone:** **Date:** April 18, 2001

---

**Re:** Express Mart & Gas Work Plan

---

Urgent     For Review     Please Comment     Please Reply     Please Recycle

---

**• Comments:**

Amir,

Per your request, attached is page 3 of the site investigation work plan for 2951 High Street in Oakland.

Tim Cook, PE  
Principal Engineer

Site Investigation Work Plan  
2951 High Street  
Oakland, California

March 26, 2001  
Job No. 3936  
Page 3

### 3.1 Drilling Procedures

Temporary borings will be advanced using a truck-mounted Geoprobe rig. A California Registered Geologist or a WAC field geologist under the direct supervision of a California Registered Geologist will log the borings. The following procedures will be used to prevent potential cross-contamination of underlying water-bearing zones:

1. Drilling will cease if five feet of a low permeability layer (i.e., a clay layer) is encountered below the first encountered water. It will be assumed that any significant low permeability layer is an aquitard separating water-bearing zones and will not be penetrated.
2. Drilling will be terminated five feet below any perched or unconfined water table.

The WAC geologist, will observe significant changes in material penetrated, changes in drilling conditions, hydraulic pressure, and drilling action. The WAC geologist will observe and record changes by time and depth and evaluate the relative moisture content of the samples and note water producing zones. This record will be used later to prepare a detailed lithologic log. Lithologic descriptions will include soil or rock type, color, grain, size, texture, hardness, degree of induration, carbonate content, presence of fossils and other materials (gypsum, hydrocarbons) and other pertinent information.

### 3.2 Soil Sampling in Temporary Borings

Two soil samples will be collected in each of the borings. One sample will be collected at a depth of 5 fbg and one at the soil groundwater interface. Soil samples will be collected using the Geoprobe direct push drilling method using a 4-foot long steel split sampler lined with clear acetate sample tubes. The steel sampler will be decontaminated before each use by steam cleaning, or with laboratory grade detergent solution wash, and rinsed with tap water or deionized water. The sampler will be placed down the boring and driven using a vibrating impact hammer. Immediately after removing the acetate core barrel from the sampler, the sampled interval will be cut from the tube using a hack saw. The sleeve ends will be completely covered with Teflon sheets and end caps will be placed such that an airtight seal is maintained. Care will be taken such that the Teflon sheets are not wrinkled.

Soil samples selected for analysis will be labeled indicating project name (or number), sample number, sample depth, date and collection time. The same information will be recorded on the chain of custody form. Soil samples will be placed in a cooler with frozen gel packs or ice. The sample cooler will be delivered to the analytical laboratory within 24 hours of collection.

### 3.3 Groundwater Sampling in Temporary Borings

Upon completion of the Geoprobe temporary borings, groundwater samples will be collected at a depth approximately 5-feet below the first encountered groundwater. A temporary well will be

**W.A. CRAIG, INC.**  
**Environmental Consulting & Construction**  
**6940 Tremont Rd.**  
**Dixon, CA 95620**  
**(707) 693-2929**  
**fax (707) 693-2922**

# Fax

**To:** Amir Ghouliani **From:** Tim Cook

---

**Fax:** (510) 337-9335 **Pages (including this one):** 2

---

**Phone:** **Date:** April 18, 2001

---

**Re:** Express Mart & Gas Work Plan

---

Urgent     For Review     Please Comment     Please Reply     Please Recycle

• **Comments:**

Amir,

Per your request, attached is page 3 of the site investigation work plan for 2951 High Street in Oakland.

Tim Cook, PE  
Principal Engineer

Site Investigation Work Plan  
2951 High Street  
Oakland, California

March 26, 2001  
Job No. 3936  
Page 4

constructed to obtain a representative groundwater sample. The temporary boring will be constructed with approximately 5 feet of 0.02-inch slotted well screen and the remainder of the well will be flush-threaded blank schedule 40 PVC casing. The screened portion will be placed to the bottom of the boring. No glues or other solvents will be used in the construction of the wells.

Groundwater samples will be decanted from the bailer into laboratory prepared containers. The samples will be immediately placed in refrigerated storage for delivery to the laboratory. The samples will be labeled in such a manner as to maintain client confidentiality. Samples will be delivered under chain of custody control to an analytical laboratory that is certified by the State of California to perform the requested analyses. Groundwater samples will be analyzed for TPH-g, BTEX, and fuel oxygenates (DIPE, MtBE, TAME, ETBE, and TBA).

Upon completing the sampling, the temporary casing will be removed and the boring will be sealed from the bottom to the ground surface using a Portland Type II or III cement/bentonite grout mixture.

### 3.4 Field Equipment Decontamination Procedures

The sampler will be decontaminated before and after each use by steam cleaning or washing in a laboratory grade detergent solution, followed by tap water, or deionized water rinses. Potable water will be used for decontamination of drilling equipment.

All rinseate water used in the decontamination process and all purge water and soil cores from the temporary wells will be stored on-site in steel DOT approved drums. Drums will be labeled as to contents, date container filled, company name, and sealed. The drums will be left on-site for subsequent disposal pending analytical results.

### 4.0 SITE SPECIFIC THRESHOLD LEVELS

Site Specific Threshold Levels (SSTLs) for soil and groundwater were established in a Tier 2 Risk Based Corrective Action (RBCA) model for the site (Palmer, April 27, 1997). The RBCA considered four likely scenarios for onsite and offsite migration of the contaminant plume, 1) vapors entering a residence 30 feet from the property boundary; 2) vapors entering a commercial building directly over the contaminated area; 3) dermal and inhalation exposure to a construction worker directly over the contaminated area; and 4) vapors entering a commercial building directly above monitoring well MW-5. Table 2 summarizes SSTLs for groundwater and subsurface soil assuming an excess human health risk of  $1 \times 10^{-6}$ .

### 5.0 INTERIM REMEDIAL ACTION PLAN

An Interim Remedial Action Plan will be prepared and submitted to the ACHCS. The IRAP will include site history, figures identifying sample locations, drilling logs, laboratory analytical reports, a summary of work performed, a tabulation of analytical results, a figure projecting the

\\Tom\Central Project Files\3936 High Street\Work Plans\Site Investigation Work Plan\Site Investigation Work Plan.doc





# State Water Resources Control Board



Winston H. Hickox  
Secretary for  
Environmental  
Protection

Division of Clean Water Programs  
1001 I Street • Sacramento, California 95814  
P.O. Box 944212 • Sacramento, California • 94244-2120  
(916) 341-5652 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf

Gray Davis  
Governor

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.*

April 17, 2001

ST 1038

Abraham  
4/25/01  
(Signature)

Aziz Kandahari  
Himalaya Trading Company; Assignee Of Zima Center Corp.  
32785 Olympiad Ct  
Union City, CA 94587

PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 8355,  
SITE ADDRESS: 2951 HIGH ST, OAKLAND, CA 94619

I have reviewed your request, received on April 6, 2001, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the March 26, 2001, W. A. Craig proposal/workplan approved by the Alameda County EHD (County) in their March 29, 2001 letter, is \$ 14,435; see the table below for a breakdown of costs.

*Be aware that this pre-approval does not constitute a decision on reimbursement: necessary (as determined by the Fund) corrective action costs for corrective action work directed and approved by the County will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary. If the Fund agrees that they were in fact necessary, the Fund will reimburse at reasonable rates (rates consistent with those pre-approved.)*

*In an effort to expedite future reimbursement requests associated with the implementation of these pre-approved tasks, we request that the attached 'Pre-Approval Specific Reimbursement Request Spreadsheet' be completed/updated and submitted with the relevant supporting documentation.*

*In order for future costs for corrective action to be part of the expedited reimbursement processes they must be pre-approved in writing by Fund staff and must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations.*

Claim No. 8355

### COST PRE-APPROVAL BREAKDOWN

#	Task*	Amount Pre-Approved	Comments
1	Project management	\$1,313	
2	File review	\$1,251	
3	Site investigation	\$1,517	Direct costs for oversight, sampling
4	Drilling subcontractor	\$3,067	Geoprobe for 1 1/2 days
5	Soil & groundwater sampling	\$5,847	Sampling equipment & analytical lab
6	Interim Remedial Action plan	\$1,440	
	<b>TOTAL PRE-APPROVED</b>	<b>\$ 14,435</b>	

\* Task descriptions are the same as those identified in W. A. Craig's April 16, 2001 Cost Estimate

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid. Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to determine if the additional tasks and costs are necessary and reasonable. Unfortunately, if costs exceed the pre-approval amounts, Fund staff will be unable to expedite your reimbursement request associated with this pre-approval.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- The Fund regulations require three bids for corrective action work unless three bids are unnecessary, unreasonable or impossible under the particular circumstances. Because the proposed costs appear reasonable, it is unnecessary to obtain three bids for the proposed corrective action efforts; the Fund's three bid requirement is waived for this scope of work only. Any future scopes of work are subject to the three bid requirement unless a waiver of the bidding requirements is received.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to W. A. Craig proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated April 16, 2001 by W. A. Craig for implementing the March 26, 2001, W. A. Craig workplan.

April 17, 2001

Claim No. 8355

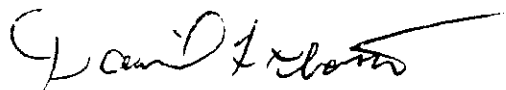
If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. ***Please insure that your consultant prepares their invoices to include the required break down of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:***

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Please call if you have any questions; I can be reached at (916) 341-5652.

Sincerely,



David F. Charter, RG  
Senior Engineering Geologist  
Technical Review Unit  
Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Amir Gholami  
Alameda County EHD  
✓ 1131 Harbor Bay Pkway, 2nd Fl.  
Alameda, CA 94502-6577

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

March 29, 2001

**STID 1038**

Mr. Mohammed Mashhoon  
Zima Center Inc.  
1751 Jefferson Street  
Oakland, CA 94612

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA 94619**

Dear Mr. Mashhoon:

This office is in receipt of a faxed copy of "Site Investigation workplan" dated March 26, 2001, submitted by Mr. Tim Cook of W.A. Craig, Inc. regarding the above referenced site. I have reviewed this report and concur with it. However, per my discussion with Mr. Leland Yialelis of W.A. Craig, Inc. **you need to perform an additional soil/groundwater sample at the southwest border of the property and analyze for the same constituents indicated within this report.**

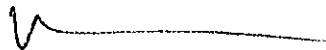
Furthermore, please address the following issues:

- According to previous reports the MTBE concentration had actually increased in MW-2 well from 9,200 to 19,000ppb, and MW-4 from 7,100 to 13,000ppb, I had requested you to actively remediate this plume beside lone application of Oxygen Releasing Compound (ORC) in order to expedite the clean up process. The removal of the existing older tanks may, however, change this increasing trend in the concentrations of the constituents. **Please submit an "interim remedial action" plan to address the high levels of MTBE at this site.** This is necessary due to high concentration of MTBE and that the MTBE levels had actually increased even with the application of ORC. However, you may continue with the application of Oxygen Releasing Compound (ORC) in order to expedite clean up process. Furthermore, you need to evaluate the efficiency of this method versus other possible remediation techniques.
- I understand that there are four older Underground Storage Tanks (USTs), which are scheduled for removal in the near future. This along with over-excavation of the contaminated soil are significant and necessary steps, which can act as "source removal" and as part of "interim remedial action" to expedite the clean up process. However, these steps alone might not be sufficient enough to control MTBE and other plumes.

- Per our previous correspondence you have indicated that there is a letter by my ex-colleague, Madhulla Logan, dated August 2, 1997, which approves Site Specific Threshold Levels (SSTLs) using Risk Based Corrective Action (RBCA) assessment. **Please submit to this office a copy of this letter along with a copy of Risk Based Corrective Action (RBCA) assessment .**

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. Tim Cook of W.A. Craig, Inc., 6940 Tremont Road, Dixon, CA 95620  
Mr. Hernan Gomez, City of Oakland Fire Department / OES 1605 MLK Junior Way,  
Oakland, CA 94612  
Files

**W.A. CRAIG, INC.**  
**Environmental Consulting & Construction**  
**6940 Tremont Rd.**  
**Dixon, CA 95620**  
**(707) 693-2929**  
**fax (707) 693-2922**

1038

**Fax**

**To:** Amir Ghouhani **From:** Tim Cook  
**Fax:** (510) 337-9335 **Pages (including this one):** 13  
**Phone:** **Date:** March 27, 2001  
**Re:** Express Mart & Gas Work Plan

Urgent     For Review     Please Comment     Please Reply     Please Recycle

**● Comments:**

Mr. Ghouhani,

Attached is the work plan for a site investigation in the vicinity of the pump island at the front of the property at 2951 High Street in Oakland. You requested that we fax the work plan to you so you could review it and grant your approval in an expedited manner. Please call if you have questions.

Tim Cook, PE  
Principal Engineer



**W. A. CRAIG, INC.**

Environmental Contracting and Consulting

6940 Tremont Road

Dixon, California 95620

Contractor and Hazardous Substances License #455752

tech@wacraig.com

(800) 522-7244

Dixon (707) 693-2929

Napa (707) 252-3353

Fax: (707) 693-2922

## SITE INVESTIGATION WORK PLAN

**SITE LOCATION:**

**Express Gas & Mart**

**2951 High Street**

**Oakland, California**

**PREPARED FOR:**

**Mr. Aziz Kandahari**

**Himalaya Trading Company**

**2951 High Street**

**Oakland, CA 94619**

*LELAND*

**SUBMITTED TO:**

**Alameda County Health Care Services**

**Hazardous Materials Division**

**1131 Harbor Bay Parkway**

**Alameda, California 94502**

**W. A. CRAIG, INC. PROJECT # 3936**

**March 26, 2001**

# PROFESSIONAL CERTIFICATION

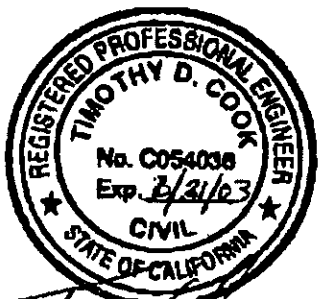
## Site Investigation Workplan


Express Gas & Mart  
2951 High Street  
Oakland, California

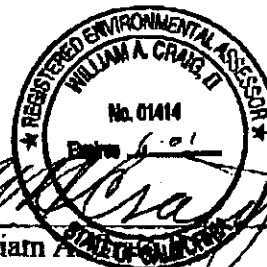
Job No. 3936  
March 26, 2001

This document has been prepared by the staff of W. A. Craig, Inc., under the professional supervision of the persons whose seals and signatures appear hereon. No warranty, either expressed or implied, is made as to the professional advice presented herein. The site descriptions contained in this document are based upon our current understanding of site conditions. These conditions are subject to change as W.A. Craig, Inc. evaluates additional information.

Opinions or conclusions presented in this document are professional opinions based solely upon a review of existing environmental data. We recognize that the limited scope of services performed in execution of this investigation may not be appropriate to satisfy the needs, or requirements of other state agencies, or of other users. Any use or reuse of this document or its findings, conclusions or recommendations presented herein is at the sole risk of the user.



  
Tim Cook, P.E.  
Principal Engineer



  
William A. Craig, II  
President



Site Investigation Work Plan  
2951 High Street  
Oakland, California

March 26, 2001  
Job No. 3936  
Page 1

## 1.0 INTRODUCTION

### 1.1 Site Location and Description

The site is located at 2951 High Street, in Oakland, California (Figure 1) and is located at the base of the Oakland Hills. The site topography runs southerly toward High Street. Regionally, the topography slopes westerly toward San Francisco Bay. Site soils are primarily clayey silt, sandy silt, silty sand with minor amounts of gravelly sand. Groundwater occurs at approximately 21 feet below grade (fbg) in monitoring wells MW-5 and MW-6 located on site. Potentiometric surface maps for this site have generally shown groundwater flow to the southeast (ASE, November 14, 2000). Site structures and other features are indicated on Figure 2.

### 1.2 Objectives

The objectives of this site investigation is to determine the lateral and vertical extent of contaminated soils in the vicinity of pump dispensers located on the south side of the site. A subsequent source removal action will abate soils with concentrations greater than the Site Specific Threshold Levels (SSTLs) established in a Tier 2 Risk Based Corrective Action computer model (Palmer, August 22, 1997).

### 1.3 Background

The owner provided insufficient data to WAC to summarize previous site investigation and remediation activities. Reportedly, there are six monitoring wells onsite. Monitoring wells MW-1, MW-3, and MW-6 have consistently yielded non-detectable concentrations of petroleum hydrocarbon constituents. Between May 28 and June 24, 1997, 2,550 pounds of ORC slurry was injected into borings along the northern and eastern side of the old USTs to promote aerobic biodegradation of petroleum hydrocarbons dissolved in groundwater. On August 21, 1998, ORC socks were installed in wells MW-4 and MW-5 (ASE, November 14, 2000). The location of these USTs and the six monitoring wells are shown on Figure 2.

Tim Cook of W.A. Craig, Inc (WAC) sampled a pipe trench located on the south side of the property in the vicinity of pump dispensers on February 28, 2001. High concentrations of petroleum hydrocarbons were detected in six soil samples collected from this area (W.A. Craig, March 9, 2001). The locations of the six soil samples are shown on Figure 3. Soil sample results are summarized in Table 1.

WAC met with Mr. Hernan Gomez of the City of Oakland Fire Services Agency and Mr. Amir Ghouliani of the Alameda County Health Care Services, Hazardous Materials Division (ACHCS) on March 19, 2001 to discuss the approach to corrective action. The regulatory agencies requested submittal of this Site Investigative Work Plan prior to implementing remediation of contaminated soil.

Site Investigation Work Plan  
2951 High Street  
Oakland, California

March 26, 2001  
Job No. 3936  
Page 2

## 2.0 PROPOSED SCOPE OF WORK

The scope of services proposed herein will be performed to characterize the lateral and vertical extent of petroleum hydrocarbon contaminated soil in the vicinity of the pump island dispensers located on the southern portion of the site.

The proposed scope of services includes collecting soil and groundwater samples from eight soil borings. Upon completion of the proposed scope of services, WAC will review the soil and groundwater quality data and recommend remedial actions as necessary to comply with SSTLs for soil. WAC's scope of services was developed based on our present knowledge of site conditions.

The scope of work proposed for this investigation includes the following:

- Prepare this Work Plan and a Site-Specific Health and Safety Plan for submittal to the ACHCS;
- Obtain appropriate regulatory permits and approvals;
- Obtain utility clearance through Underground Service Alert;
- Install eight temporary borings;
- Collect two soil samples per temporary boring;
- Collect one groundwater sample per temporary boring;
- Analyze soil and groundwater samples for TPH-g, benzene, toluene, ethylbenzene and xylenes (BTEX) and methyl tert-butyl ether (MTBE); and
- Prepare a Site Investigation Report that documents the results of the site investigation and makes recommendations regarding the volume of contaminated soil to be excavated from the site.

## 3.0 SITE INVESTIGATION PROCEDURES

Temporary borings for soil and groundwater sampling will be situated in the approximate locations shown on Figure 4. Borings TB-1 through TB-8 will be located south of the dispenser pumps located at the front (High Street side) of the property.

Site Investigation Work Plan  
2951 High Street  
Oakland, California

March 26, 2001  
Job No. 3936  
Page 4

constructed to obtain a representative groundwater sample. The temporary boring will be constructed with approximately 5 feet of 0.02-inch slotted well screen and the remainder of the well will be flush-threaded blank schedule 40 PVC casing. The screened portion will be placed to the bottom of the boring. No glues or other solvents will be used in the construction of the wells.

Groundwater samples will be decanted from the bailer into laboratory prepared containers. The samples will be immediately placed in refrigerated storage for delivery to the laboratory. The samples will be labeled in such a manner as to maintain client confidentiality. Samples will be delivered under chain of custody control to an analytical laboratory that is certified by the State of California to perform the requested analyses. Groundwater samples will be analyzed for TPH-g, BTEX, and fuel oxygenates (DIPE, MtBE, TAME, ETBE, and TBA).

Upon completing the sampling, the temporary casing will be removed and the boring will be sealed from the bottom to the ground surface using a Portland Type II or III cement/bentonite grout mixture.

### 3.4 Field Equipment Decontamination Procedures

The sampler will be decontaminated before and after each use by steam cleaning or washing in a laboratory grade detergent solution, followed by tap water, or deionized water rinses. Potable water will be used for decontamination of drilling equipment.

All rinsewater used in the decontamination process and all purge water and soil cores from the temporary wells will be stored on-site in steel DOT approved drums. Drums will be labeled as to contents, date container filled, company name, and sealed. The drums will be left on-site for subsequent disposal pending analytical results.

### 4.0 SITE SPECIFIC THRESHOLD LEVELS

Site Specific Threshold Levels (SSTLs) for soil and groundwater were established in a Tier 2 Risk Based Corrective Action (RBCA) model for the site (Palmer, April 27, 1997). The RBCA considered four likely scenarios for onsite and offsite migration of the contaminant plume, 1) vapors entering a residence 30 feet from the property boundary; 2) vapors entering a commercial building directly over the contaminated area; 3) dermal and inhalation exposure to a construction worker directly over the contaminated area; and 4) vapors entering a commercial building directly above monitoring well MW-5. Table 2 summarizes SSTLs for groundwater and subsurface soil assuming an excess human health risk of  $1 \times 10^{-6}$ .

### 5.0 INTERIM REMEDIAL ACTION PLAN

An Interim Remedial Action Plan will be prepared and submitted to the ACHCS. The IRAP will include site history, figures identifying sample locations, drilling logs, laboratory analytical reports, a summary of work performed, a tabulation of analytical results, a figure projecting the

\\Tom\Central Project File\3936 High Street\Work Plans\Site Investigation Work Plan\Site Investigation Work Plan.doc

*WHO APPROVED THIS  
W/GRADUATE STUDENT  
EM'S COPY?*

Site Investigation Work Plan  
2951 High Street  
Oakland, California

March 26, 2001  
Job No. 3936  
Page 5

limit of contaminated soil and an engineer's estimate of the volume of soil above the SSTL's that will require excavation and disposal.

A pre-approval for excavation and offsite disposal of the contaminated soil will be prepared and submitted to the State Water Resources Control Board prior to implementing corrective action at the site.

## 6.0 REFERENCES

Aqua Science Engineers, Inc., *Groundwater Monitoring Report, September 2000 Sampling at Zima Center Corporation, 2951 High Street, Oakland, California, 94619, November 14, 2000.*

Palmer, Christopher M., *Addendum to Risk Assessment for Zima Center Corporation, 2951 High Street, Oakland, CA, August 22, 1997.*

W.A. Craig, Inc., *Soil Sample Report, 2951 High Street, Oakland, California, March 9, 2001.*

LELAND

YIALELIS

**Table 1. Soil Sample Results from Pipe Trench Investigation**

Sample ID	TPH-g	MtBE	TAME	benzene	toluene	ethylbenzene	xylenes
S-1	180	4	0.17	0.14	5.8	3.2	22
S-2	71	6.8	0.19	0.20	2.8	1.7	6.2
S-3	370	2.9	0.13	0.26	2.1	2.5	15
S-4	180	0.3	<0.01	0.12	0.95	1.3	16
S-5	3,600	2.3	<1	2.6	15	49	340
S-6	730	85	4.7	4.0	49	8.6	62

8 pm July 2001  
 no other product found in trench pipes

**Table 2. Site Specific Threshold Levels**

Constituent	SSTLs	
	Groundwater (ug/l)	Subsurface Soil (mg/kg)
benzene	200	2.6
ethylbenzene	180	1.9
toluene	270	1.6
total xylenes	470	2.8
MtBE	8,400	9.7

was lowered  
 7/27/01

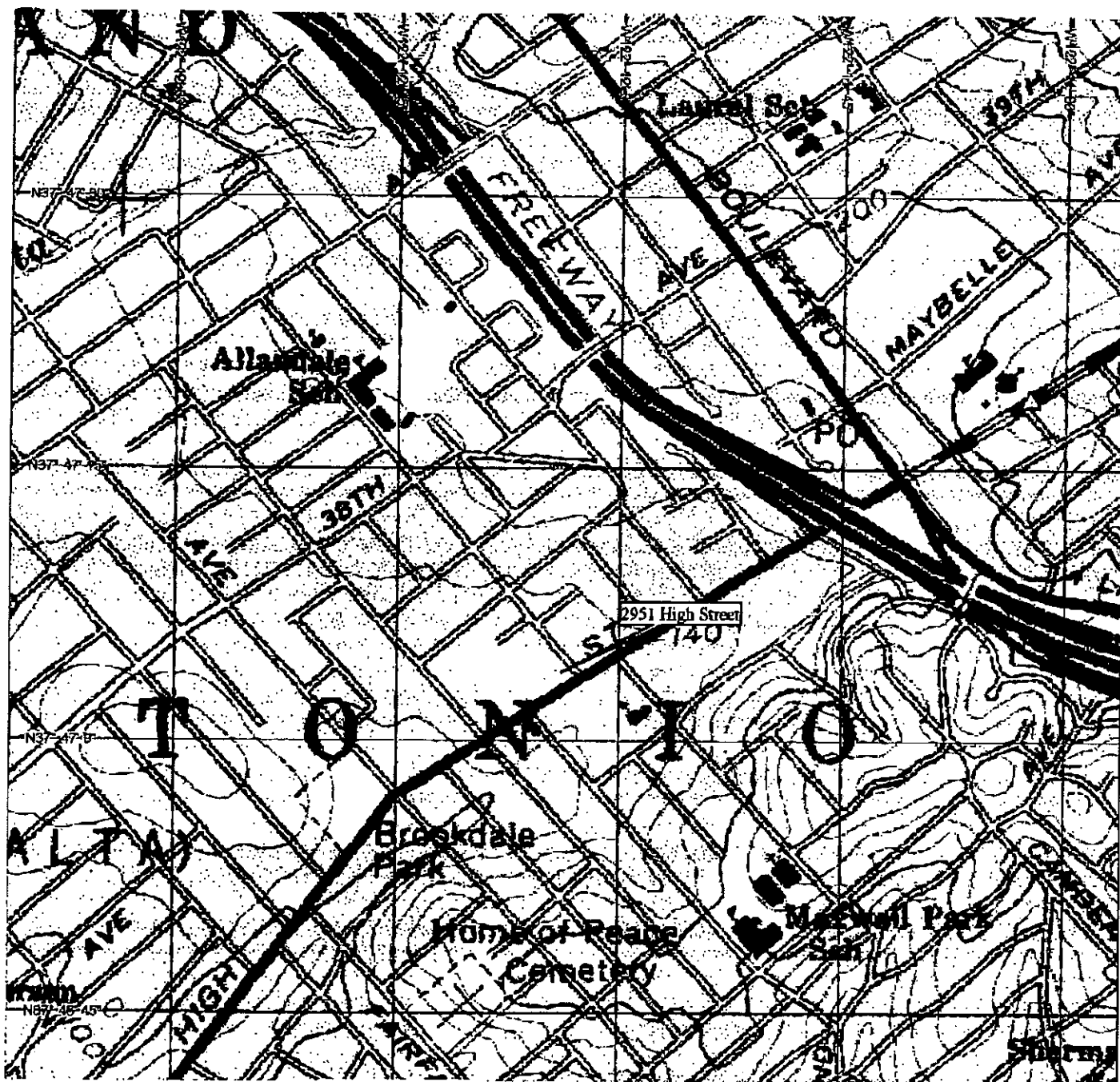
Tier 2  
 N/S

Note: SSTLs were established in *Addendum to Risk Assessment for Zima Center Corporation, 2951 High Street, Oakland, CA.*, Christopher M. Palmer Consulting Hydrogeologist, August 22, 1997.

was the  
 cap?

Done 9/97

Did it (look at TPH-g) appear?  
 could not find it is not in the surface



Site Location Map

EXPRESS GAS & MART  
2951 High Street  
Oakland, CA

Project No.3936

March 26, 2001

Figure 1



NORTH

Checked by: TDC

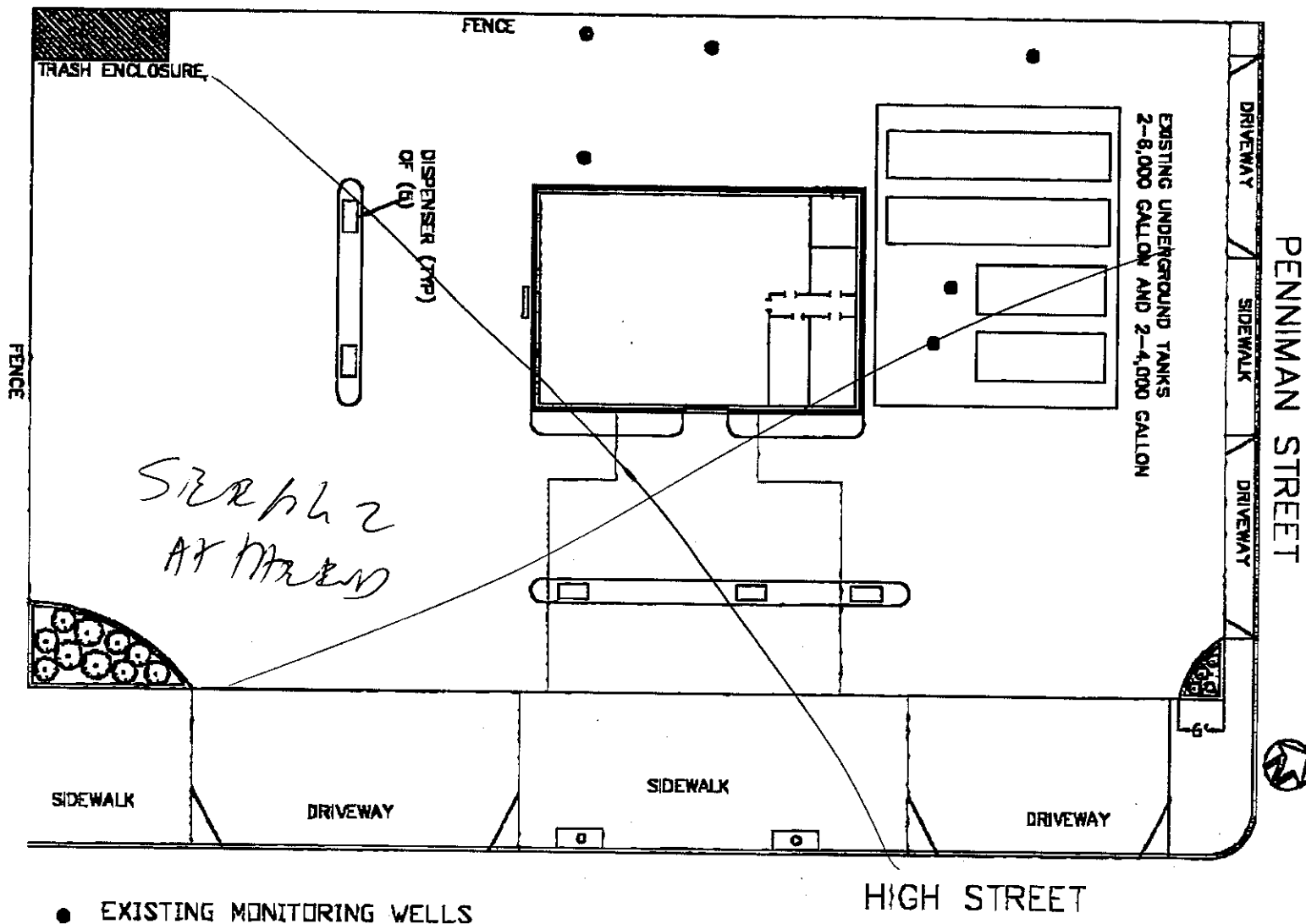


**W. A. Craig, Inc.**

Environmental Contracting and Consulting

6940 Tremont Road  
Dixon, California 95620  
Cal License #455752

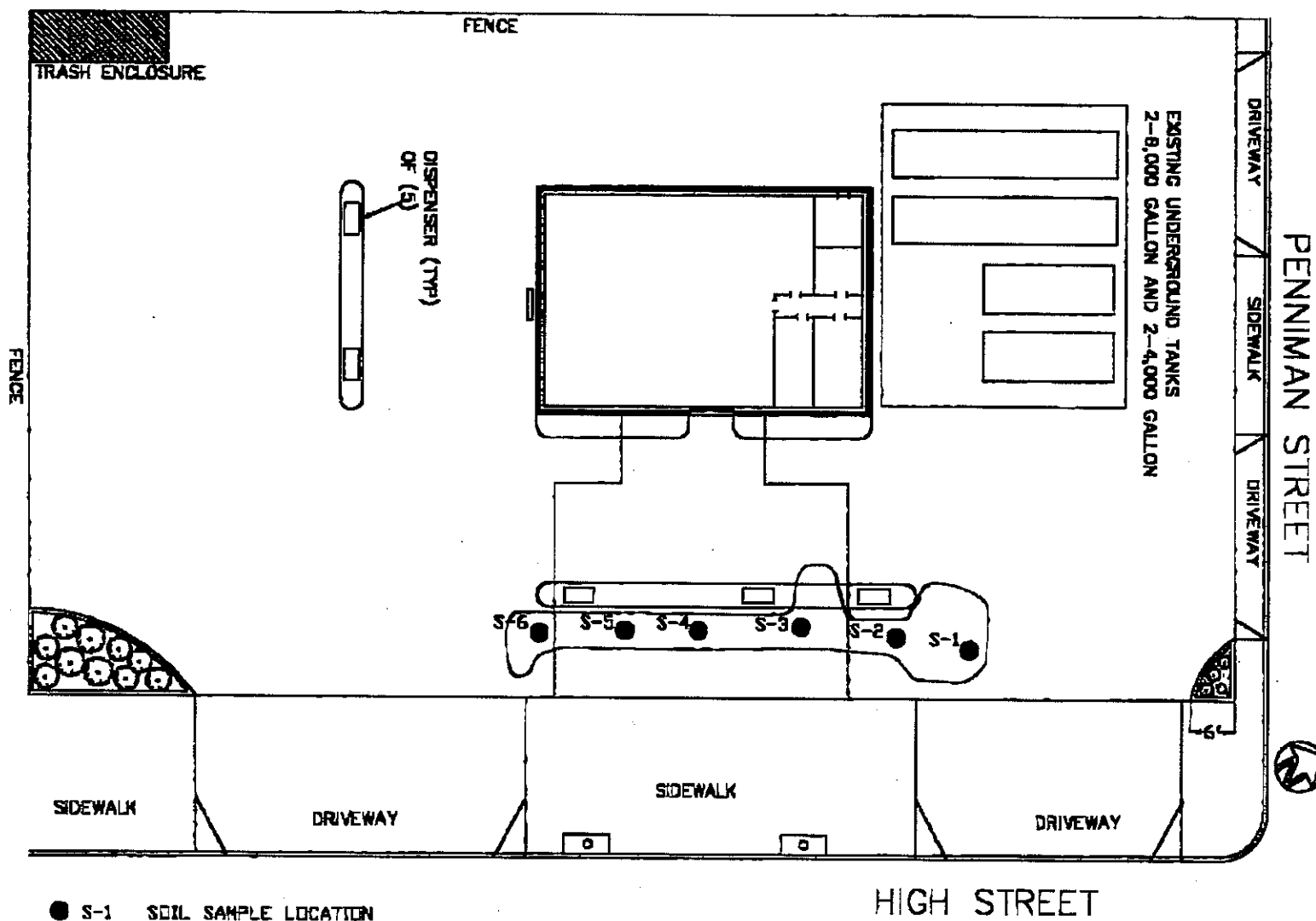
(707) 693-2929  
FAX (707) 693-2922



**W.A. Craig, Inc.**  
 6940 Tremont Road LIC# 455752  
 Dixon, California 95620-9603  
 PH# (707) 693-2929

**MONITORING WELL LOCATIONS**  
 2951 High Street  
 Oakland California

Project: 3936	Figure:
Date: 3/27/01	2
Scale: 1" = 20'	

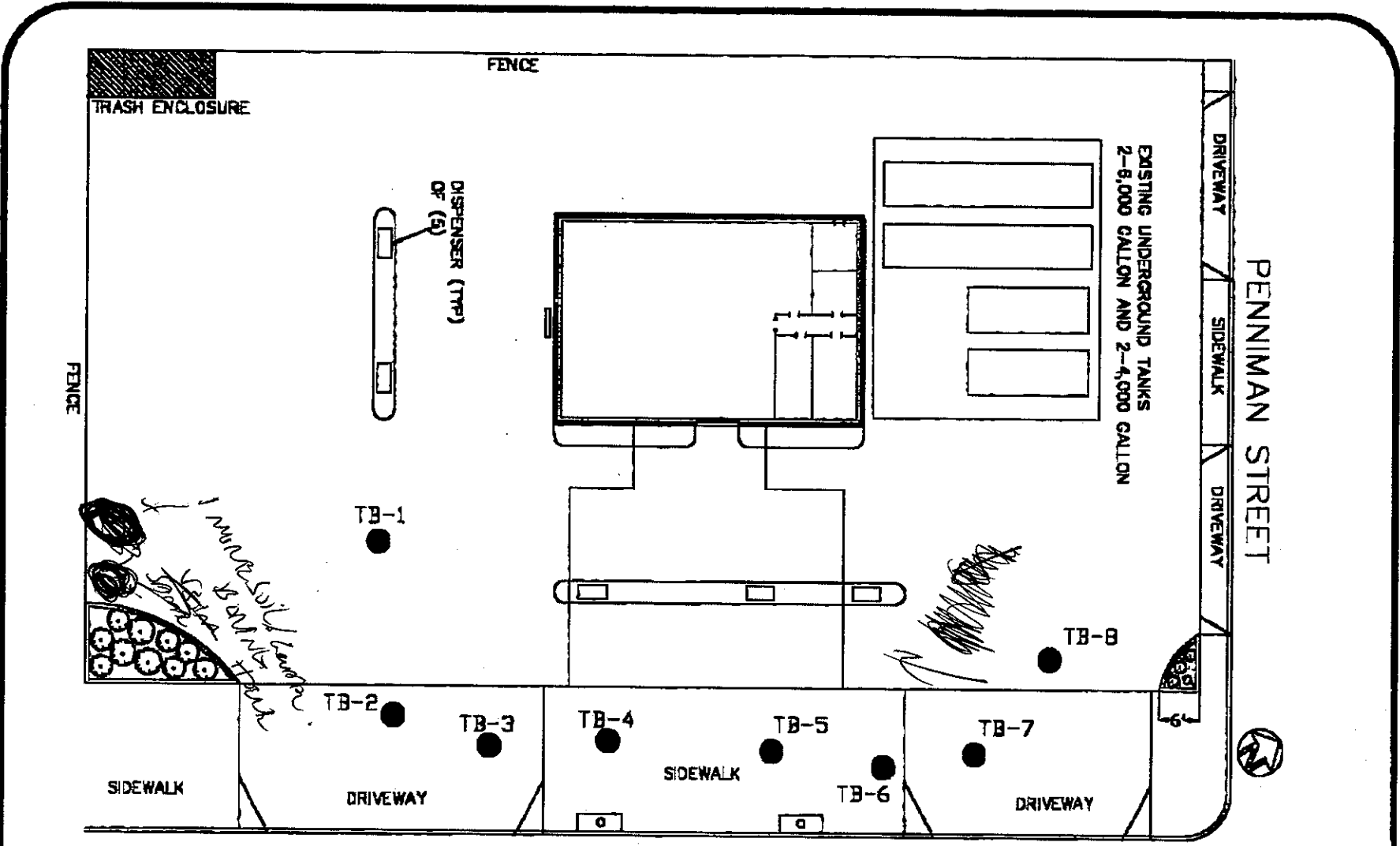


**W.A. Craig, Inc.**  
 6940 Tremont Road LC# 455752  
 Dixon, California 95620-9803  
 PH# (707) 693-2929

**SOIL SAMPLE LOCATIONS**  
 2951 High Street  
 Oakland California

Project: 3936	Figure:
Date: 3/27/01	3
Scale: 1" = 20'	





● TB-1 Proposed Boring Location

HIGH STREET

PENNIMAN STREET



**W.A. Craig, Inc.**

6940 Tremont Road LIC# 455752  
 Dixon, California 95620-9603  
 PH# (707) 693-2929

**Proposed Soil Boring Locations**

2951 High Street  
 Oakland California

Project: 3536	Figure: 4
Date: 3/27/01	
Scale: 1" = 20'	

**W. A. CRAIG, INC.**

Environmental Contracting and Consulting

6940 Tremont Road

Dixon, California 95620

Contractor and Hazardous Substances License #455752

Cal/OSHA Statewide Annual Excavation Permit #559351

tech@wacraig.com

(800) 522-7244

STW  
1038

Dixon (707) 693-2929

Napa (707) 252-3353

Fax: (707) 693-2922

**Fax Transmittal Sheet**

Date: March 28, 2001  
To: Amir Gholami  
Company: Alameda County Environmental Health  
Fax #: 510-337-9335  
From: Tim Cook

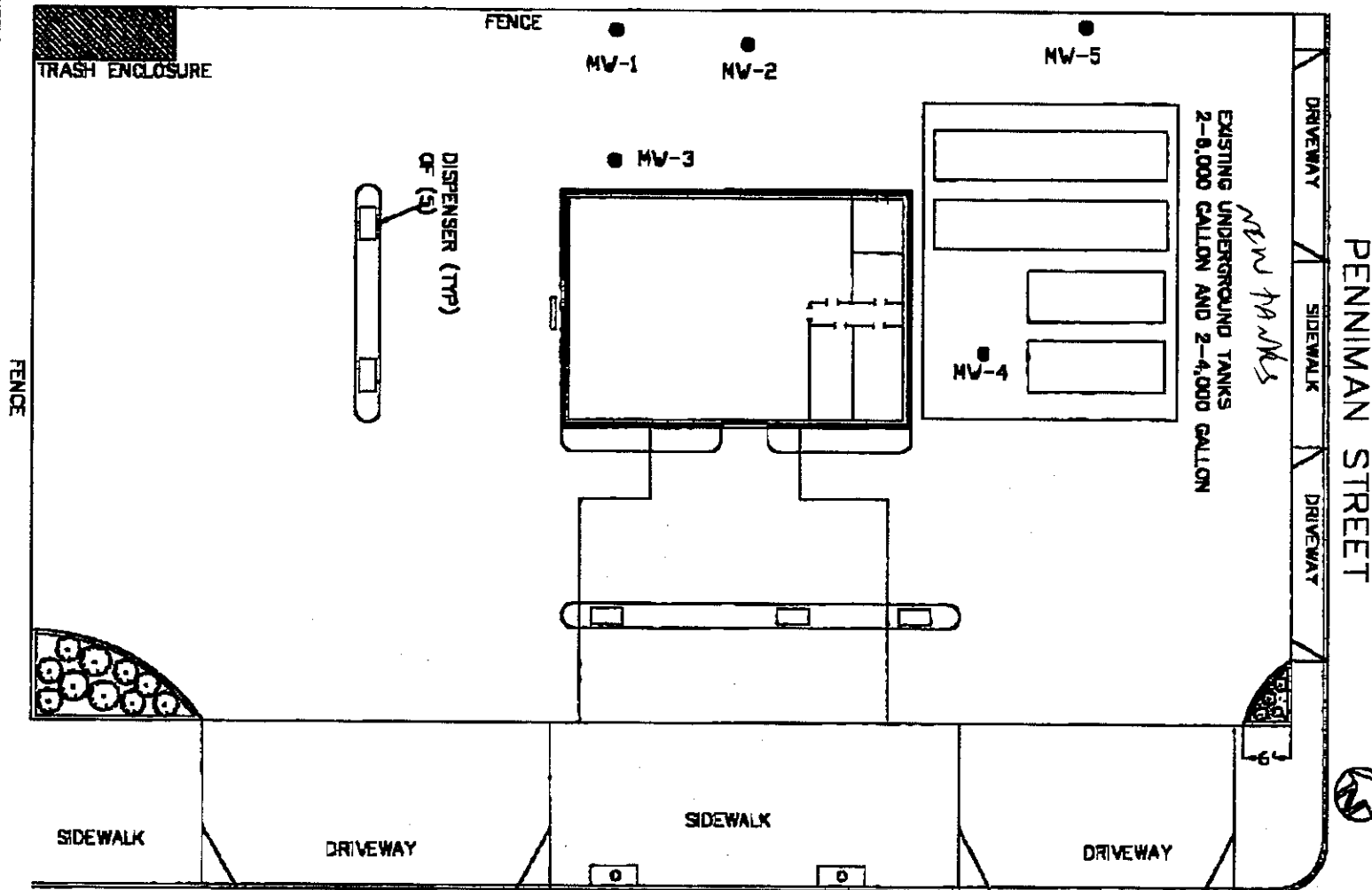
Total Pages: 2 (Including Cover Page)  
Hard copy to follow No

Hello Amir,

Attached is a revised map showing the locations of the existing monitoring wells at the Express Gas & Mart at 2951 High Street in Oakland. Please substitute it for **Figure 2** in the W. A. Craig, Inc. *Site Investigation Workplan* dated March 26, 2001. Sorry about the mistake. In order to avoid similar mistakes in the future, I would like to make an appointment to review your agencies files on the site. Please call with any questions or comments.

Tim Cook, PE  
Principal Engineer

MV-6



● EXISTING MONITORING WELLS

HIGH STREET



W.A. Craig, Inc.  
 8940 Tremont Road LIC# 455752  
 Dixon, California 95820-8803  
 PH# (707) 693-2928

MONITORING WELL LOCATIONS  
 2951 High Street  
 Oakland California

Project: 3936	Figure: 2
Date: 3/27/01	
Scale: 1" = 20'	



**W. A. CRAIG, INC.**

Environmental Contracting and Consulting

6940 Tremont Road  
Dixon, California 95620  
Contractor and Hazardous Substances License #455752  
Cal/OSHA Statewide Annual Excavation Permit #559351  
tech@wacraig.com  
(800) 522-7244

Dixon (707) 693-2929

Napa (707) 252-3353

Fax: (707) 693-2922

**Fax Transmittal Sheet**

Date: March 16, 2001  
To: Amir Ghojani  
Company: Alameda County Environmental Health  
Fax #: 510-337-9335  
From: Brian Milton

*STAD 1038*

*MAZIZ  
(510) 438-8400*

Total Pages: 4 (Including Cover Page)  
Hard copy to follow No

*LELAND  
3:45*

Hello Amir,

Attached are the sample results for the Express Gas & Mart at 2951 High Street in Oakland. Please call with any questions or comments. I understand you requested a workplan for interim remedial action in a phone conversation with Leland Yialelis of W. A. Craig, Inc. The station owner has been sent a cost proposal and we intend to submit the workplan as soon as possible. I would greatly appreciate it if you could fax, email or mail the request in writing so that the station owner, Mr. Kandahari, does not have trouble getting reimbursed from the SWRCB UST Cleanup Fund. Thank you for your time.

Brian Milton  
Associate Engineer


**W. A. CRAIG, INC.**

Environmental Contracting and Consulting

6940 Tremont Road

Dixon, California 95620

Contractor and Hazardous Substances License #455752

e-mail: tech@wacraig.com

(800) 522-7244

Dixon (707) 693-2929

Napa (707) 252-3353

Fax: (707) 693-2922

March 9, 2001

Project No. 3936

Mr. Aziz Kandahari  
 Himalaya Trading Company  
 2951 High Street  
 Oakland, CA 94619

**Subject: Soil Sample Results**  
**2951 High Street**  
**Oakland, California**

Dear Mr. Kandahari:

At your request, W.A. Craig, Inc. collected six soil samples from the bottom of a pipe trench at the subject site on February 28, 2001. Sample locations are presented on the attached Figure 1. A strong hydrocarbon odor was noted in the pipe trench. Gasoline was present in several low spots in the trench. Results of the soil samples are summarized in the following table. Complete laboratory analytical reports are in Attachment A.

Sample ID	TPH-g	MtBE	TAME	benzene	toluene	ethylbenzene	xylenes
S-1	180	4	0.17	0.14	5.8	3.2	22
S-2	71	6.8	0.19	0.20	2.8	1.7	6.2
S-3	370	2.9	0.13	0.26	2.1	2.5	15
S-4	180	0.3	<0.01	0.12	0.95	1.3	16
S-5	3,600	2.3	<1	2.6	15	49	340
S-6	730	85	4.7	4.0	49	8.6	62

Based on observations during the sampling and these laboratory results, it appears there has been an uncontrolled release of petroleum hydrocarbons from the pump dispenser area in front of the store. A copy of this letter is being forwarded to Mr. Hernan Gomez at the City of Oakland Fire Department to notify the City of this release.

Soil Sample Report  
2951 High Street  
Oakland, California

March 9, 2001  
Project No. 3936  
Page 2

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Thank you for calling on W.A. Craig, Inc. to perform this limited site investigation. Please call me if you have any questions or concerns in regard to this project.

Sincerely,

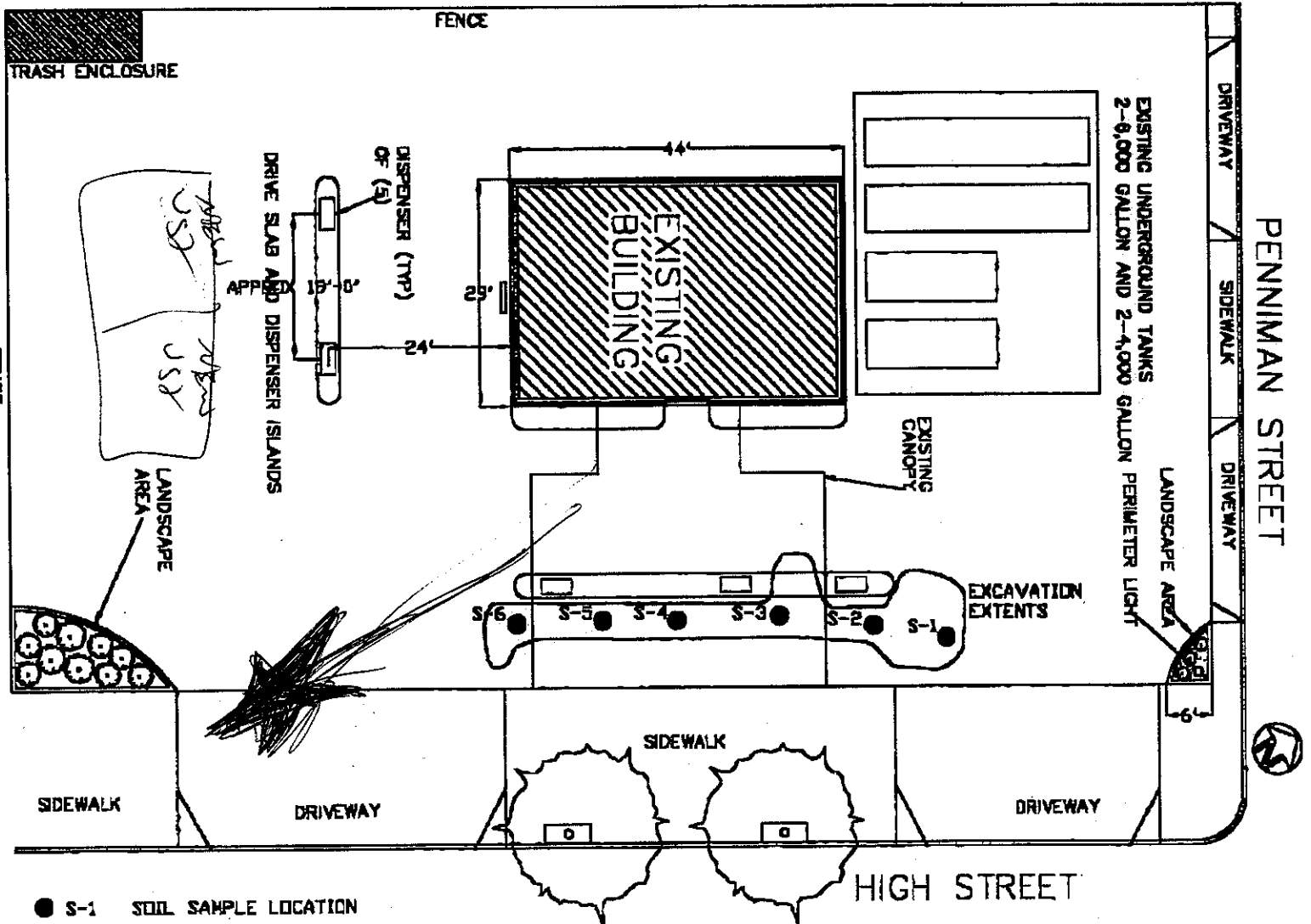
**W.A. Craig, Inc.**



Tim Cook, PE  
Principal Engineer

Attachment: Laboratory reports

Cc: Hernan Gomez, City of Oakland Fire Services Agency



● S-1 SOIL SAMPLE LOCATION



**W.A. Craig, Inc.**  
 6840 Tremont Road LIC# 455752  
 Dixon, California 95620-9803  
 PH# (707) 693-2929

**Soil Sample Locations**  
 2951 High Street  
 Oakland California

Project: 3936	Figure: 1
Date: 3/9/01	
Scale: 1" = 20'	

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 11, 2000

**STID 1038**

Mr. Mohammed Mashhoon  
Zima Center Inc.  
1751 Jefferson Street  
Oakland, CA 94612

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

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA  
94619**

Dear Mr. Mashhoon:

I am in receipt of the "Groundwater Monitoring Report, September 2000 Sampling dated November 14, 2000, submitted by Robert E. Kitay of Aqua science Engineers, Inc. I would like to make the following comments regarding this report:

- You have indicated that there is a letter by my ex-colleague, Madhulla Logan, dated August 2, 1997, which approves Site Specific Threshold Levels (SSTLs) using Risk Based Corrective Action (RBCA) assessment. Please send a copy of this letter to this office.
- You have indicated that you did not receive my previous letter due to wrong address. However, Zima Center Corporation address is indicated as 1721 Jefferson Street, Oakland even in introduction part of this present report. I will be sending this report to 1751 Jefferson Street as you have requested.
- As with the previous report, the MTBE concentration has actually increased in MW-2 well from 9,200 to 19,000ppb, and MW-4 from 7,100 to 13,000ppb since the last analysis. I understand that MW-4 analysis was done in 1997. However this level of MTBE concentrations may imply presence of a contributing source causing this trend. I believe you have to actively remediate this plume beside just applying Oxygen Releasing Compound (ORC) in order to expedite clean up process. This, I believe, is necessary due to the fact that the concentration of MTBE has actually increased even with the application of ORC. However, you may continue with the active remediation process of applying Oxygen Releasing Compound (ORC) to expedite clean up process. Furthermore, I believe you need to perform a study to evaluate the efficiency of this method versus other possible remediation techniques.
- All if any tank(s) at this site, which are contributing to this increasing plume must be addressed immediately. I would like to know whether the existing tank(s) are single wall, double wall and whether they are tested tight and or are being monitored properly as required by Title 23 California Code of Regulations (CCR). This is required as part of source removal measures if applicable.



I will be looking forward for your response to this and the next quarterly groundwater monitoring report. Please submit them in a timely manner.

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

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Robert E. Kitay of Aqua science Engineers, Inc., 208 W. El Pintado Road, Danville,  
CA 94526  
Files

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

August 1, 2000

**STID 1038**

Mr. Mahammed Mashoon  
Zima Center Inc.  
2951 High Street  
Oakland, CA 94619

**RE: Zima Center Corporation at 2951 High Street, Oakland, CA  
94619**

Dear Mr. Mashoon:

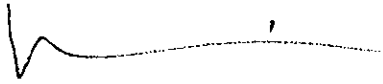
This office is in receipt of the "Groundwater Monitoring Report, June 2000 Sampling dated June 3, 2000, submitted by Robert E. Kitay of Aqua science Engineers, Inc. Please consider the following comments regarding this document:

- In my previous report I had requested you include MW-4 well for analysis due to existence of high concentrations of MTBE at 7100ppb on 33-27-97, and benzene at 300ppb on the same day revealing an increase compared to the last analysis. Additionally the MW-4 well is in down-gradient direction from the former UST. This analysis was not performed as requested previously.
- MW-1 and MW-6 wells do not need to be sampled and analyzed due to low concentrations of contaminants found during the sampling periods.
- As you indicated this case can not be considered for closure at this time due to the fact that the concentrations of TPH gasoline, Benzene, and MTBE have actually increased, in some cases significantly. You may still have a contributing source causing this trend. I concur with your suggestion regarding a need for further remediation. Please submit a plan for active remediation of this site due to high concentration of MTBE at 68,000 ppb and Benzene as high as 11,000 ppb. You may continue with the active remediation process of applying Oxygen Releasing Compound (ORC) to expedite clean up process. However, please perform a study to evaluate the efficiency of this method versus other possible remediation techniques.
- In my previous letter I had requested an explanation on how the Site Specific Threshold Levels (SSTL) were established. I have not yet received this document.

I will be looking forward for your response to this and the next quarterly groundwater monitoring report. Please submit them in a timely manner.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami', with a long horizontal flourish extending to the right.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Robert E. Kitay of Aqua science Engineers, Inc., 208 W. El Pintado Road, Danville,  
CA 94526  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 20, 1999

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

(510) 337-9335 (FAX)

STID 1038

Mr. Mahammed Mashoon  
Zima Center Inc.  
2951 High Street  
Oakland, CA 94619

RE: Property at 2951 High Street, Oakland, CA 94606

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Mashoon:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION  
Re: 2951 High Street, Oakland  
October 20, 1999  
Page 2 of 2

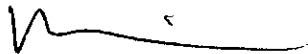
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6876 if you have any questions about the content of this letter.

Sincerely,



✓ Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

Alameda County Health care Services Agency  
Environmental Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

"List of Landowners" form  
(Sample Letter 2)

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR ( Site  
name and address)  
( to be filled in by the primary responsible party and mailed to  
Alameda County)

(Note: Fill out item 1 if there are multiple site landowners. If  
you are the sole site landowner, skip item 1 and fill out item 2)

1. In accordance with section 25297.15(a) of Chapter 6.7 of  
the Health & Safety Code, I, (name of primary responsible  
party), certify that the following is a complete list of  
current record fee title owners and their mailing addresses  
for the above site:
2. In accordance with section 25297.15(a) of Chapter 6.7 of  
the Health & Safety Code, I, (name of primary responsible  
party), certify that I am the sole landowner for the above  
site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

Alameda County Health care Services Agency  
Environmental Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

"Notice of Proposed Action" form  
(Sample Letter 3)

**SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR**  
(site name and address)  
(to be filled in by the primary responsible party and mailed to  
Alameda county)

In accordance with section 25297,15(a) of Chapter 6.7 of the  
Health & Safety Code, I, (name of primary responsible party),  
certify that I have notified all responsible landowners of the  
enclosed proposed action. Check space for applicable proposed  
action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no  
further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 21, 1997

Mr. Mohammed Mashoon  
2951 High St,  
Oakland, CA - 94619

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

STID 1038

RE: Zima - 2951 High Street, Oakland, CA

Dear Mr. Mashoon:

I am in receipt of the initial risk assessment document, dated May 19, 1997, addendum to the risk assessment report, dated August 5, 1997 and the final risk assessment document, dated August 22, 1997, prepared by Christopher Palmer, for the above referenced site.

The risk assessment was conducted using ASTM's Risk Based Corrective Action (RBCA) methodology. The risk assessment was conducted for different scenario's targeting the off-site residences, the on-site commercial workers, and the on-site construction workers based on the current use of the property (commercial). The risk assessment concluded that the "groundwater to indoor air" pathway is the only exposure route through which the concentrations could exceed the site specific target levels (SSTL's) and hence groundwater cleanup in the area around MW-5 would be required.

This Department is aware that ORC's (oxygen releasing compounds) have been injected into the boreholes between May and June 1997 with the intention of reducing the TPH concentrations in the eastern portion of the underground storage tank area. This Department has received the groundwater monitoring report dated, October 7, 1997 which indicates a significant decrease in the petroleum hydrocarbon concentrations in monitoring well, MW-5. Based on these results, this Department recommends at least two more quarters of monitoring prior to evaluating the site for closure.

If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

*Madhulla Logan*  
Madhulla Logan  
Hazardous Material Specialist

C: Robert Kitay, Aqua Science Engineering, Inc, 2411 Old Crow Canyon road, #4  
San Ramon, CA - 94583  
Christopher Palmer, 1345 Kimberly Drive, San Jose, CA - 95118



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

October 21, 1997

**Mr. Mohammed Mashoon**  
2951 High St,  
Oakland, CA - 94619

**STID 1038**

**RE: Zima - 2951 High Street, Oakland, CA**

*Revised*

Dear Mr. Mashoon:

I am in receipt of the initial risk assessment document, dated May 19, 1997, addendum to the risk assessment report, dated August 5, 1997 and the final risk assessment document, dated August 22, 1997, prepared by Christopher Palmer, for the above referenced site.

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This Department is aware that ORC's (oxygen releasing compounds) have been injected into the boreholes between May and June 1997 with the intention of reducing the TPH concentrations in the eastern portion of the underground storage tank area. This Department has received the groundwater monitoring report dated, October 7, 1997 which indicates a significant decrease in the petroleum hydrocarbon concentrations in monitoring well, MW-5. Based on these results, this Department recommends at least two more quarters of monitoring prior to evaluating the site for closure. At the time of evaluation, if the concentrations observed in the groundwater indicate plume stability, then this Department would recommend this case for closure.

If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

*Madhulla Logan*  
Madhulla Logan  
Hazardous Material Specialist

C: Robert Kitay, Aqua Science Engineering, Inc, 2411 Old Crow Canyon road, #4



September 2, 1997

Ms. Madhulla Logan  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502

**SUBJECT:**       OVERSPILL INCIDENT  
                  Zima Center Corporation  
                  2951 High Street  
                  Oakland, California

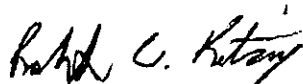
Dear Ms. Logan:

This letter is being sent to you to document what ASE knows about the overspill release at the above-referenced site. Following the increase in hydrocarbon concentrations during the March 27, 1997 groundwater sampling of monitoring well MW-5, ASE contacted Mr. Mashhoon and asked if he had any knowledge of a release of gasoline during the previous quarter that may have caused the increase in hydrocarbon concentrations in monitoring well MW-5. Mr. Mashhoon told us that in early March 1997 there was an overspill incident at the site. According to Mr. Mashhoon, Petroleum Transport Service (the company that was filling the USTs) who was contracted by Total Energy Products of Sacramento, California overfilled the USTs to a point that product backed up into the vent lines. The result was a release of approximately 30 gallons of gasoline. Mr. Mashhoon stated to ASE that at the time of the release he did not think that much of the fuel reached the subsurface as most of the spill was on the surface. Mr. Mashhoon has had no indication of leakage from the USTs and this release appears to have been a one time incident. The increase in hydrocarbons is also in no way related to the ORC remediation project at the site.

If you have any questions regarding the progress of the remediation project or about hydrocarbon concentrations in the monitoring wells, please feel free to call me at (510) 820-9391. If you have any further question about the overspill incident, please call Mr. Mashhoon at (510) 436-4700. Thank you.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.



Robert E. Kitey  
Senior Geologist

cc: Mr. Mohammad A. Mashhoon, Zima Center Corporation, 2951 High Street, Oakland, CA 94619

Total Energy Products, 3090 Fite Circle, Suite 101, Sacramento, CA 95827

1/7/99

# **EXPRESS GAS**

2951 HIGH STREET  
OAKLAND, CA 94611  
510-436-8400

---

## *Rinehart Oil, Inc.*

2401 North State St.  
Ukiah, Ca 95482

Re: Gas spillage at the Express Gas service station.

Dear Mr. Greg Myers,

I am writing this letter to request an answer to our telephone conversation in regard to the spillage of gasoline by your delivery truck service during the past year, and specifically on 12/10/98 and 12/28/98.

I have discussed this matter with Moe Mashhoon, the president of Zima Center Inc. He indicated to us that Aqua Science Engineering (company that conducts underground cleanup for Zima Center Inc.) had mentioned to him that we were in the process of obtaining no further action from the county, and the final result of the test showed some increases of gasoline in the water table which has caused further investigation and cleanup.

This situation is unacceptable. The magnitude of the spillage was so great that our storm drain and sumps were filled with gasoline.

Please respond to us in writing in regard to this matter.

Thank you very much,

---

Express Gas

Namath/ or Anthony Kandahari

cc. to Zima Center Inc.

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
DEPOSIT / REFUND ACCOUNT SHEET

printed 06/12/97

SITE INFORMATION

High St Gas Station  
2951 High St  
Oakland 94619  
Site Contact: Mohammad Mashhoon  
Site Phone : 261-1111

StID: 1038 Site#: 313  
PROJECT#: 313D + A  
PROJECT TYPE: \*\*\* MOD \*\*\*  
INSP: Don Hwang  
ACCT. SHEET PG #: \_\_\_\_\_

PROPERTY OWNER INFORMATION

Owner Contact:  
Owner Phone :

PAYOR INFORMATION

Arco High Street  
2951 High Street  
Oakland Ca 94619 # 678  
Payor Contact:  
Payor Phone :

Date	Action Taken	Time In	Time Out	Hours Spent/Depstd	Hour Balnce	Money Spent/Depositd	Money Balance
	Balance from Prev. Page			.....	.....	.....	150.-
10/07/96	Rcpt# 779152 Deposit of \$150.00 @ \$94/hour			+1.59		+\$150.00	
6/12/97	merge 313A and 313D as 313D					-393.75	-243.75

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : \_\_\_\_\_ ATTACH:  State Forms A,B & C  
 Billing Adjustment\*  
DATE OF COMPLETION : \_\_\_\_\_ DATE SENT TO BILLING: \_\_\_\_\_  
TOTAL COST OF PROJECT: \_\_\_\_\_ REFUND AMOUNT: \_\_\_\_\_ Rev. 5/96

\* Billing adjustment forms needed when site is in our UST program. REPORT: WrkShtD (ongoing Deposit)

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
 DEPOSIT / REFUND ACCOUNT SHEET

printed 06/12/97

SITE INFORMATION

High St Gas Station  
 2951 High St  
 Oakland 94619  
 Site Contact: Mohammad Mashhoon  
 Site Phone : 261-1111

StID: 1038 Site#: 313  
 PROJECT#: 313A  
 PROJECT TYPE:\*\*\* MOD \*\*\*  
 INSP: clerical  
 ACCT. SHEET PG #: \_\_\_\_\_

PROPERTY OWNER INFORMATION

PAYOR INFORMATION

Owner Contact:  
 Owner Phone :

Walton Engineering  
 837 Riske Lane  
 W. Sacramento CA 95691 # 130  
 Payor Contact:  
 Payor Phone :

Date	Action Taken	Insp Init	Hours Spent/ Depstd	Hour Balnce	Money Spent/ Depositd	Money Balance
	Rcpt# 528713					
	Balance from Prev. Page		Current balance			-393.75
	merge 313A and 313D as 313D					
	<del>for</del> balance from 313D				\$ 150.-	-243.75

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : \_\_\_\_\_ ATTACH:  State Forms A, B & C  
 Billing Adjustment\*  
 DATE OF COMPLETION : \_\_\_\_\_ DATE SENT TO BILLING: \_\_\_\_\_  
 TOTAL COST OF PROJECT: \_\_\_\_\_ REFUND AMOUNT: \_\_\_\_\_

Rev. 7/96

\* Billing adjustment forms needed when site is in our UST program.

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
 BILLING's WORKLOG: Total Deposit/Refund History for All Accounts at Site  
 ~~~~~

\*\* SITE INFORMATION \*\*

Site#: 313 -- StID: 1038 LIMA CENTENOC dba:TEXICO  
 Date Open: 10/26/92 2951 High St.  
 Date Closed: 10/17/94 Oakland CA 94619

\*\* PAYOR INFORMATION \*\*

- > Project # ---313B for Payor # 678 MASH PETROLEUM, INC.  
 2951 HIGH STREET  
 OAKLAND CA 94619
  
- > Project # ---313A for Payor # 801 D.I.CHADBOURNE ENTERP., INC.  
 204 E --2ND AVE. #622  
 SAN MATEO CA 94401

\*\* DEPOSIT HISTORY \*\*

| Proj#   | Deposit Date | Receipt# | Amount Received |
|---------|--------------|----------|-----------------|
| ---313A | 10/03/88     | 528713   | \$ 106.00       |
| ---313B | 10/26/92     | 668828   | \$ 106.00       |
| ---313B | 10/13/93     | 704531   | \$ 300.00       |
|         |              |          | \$ 981.00       |
| ---313C | 04/27/94     | 725592   | \$ 1,281.00     |
|         |              |          | \$ 1,137.00     |
| ---313D | 10/07/96     | 779152   | \$ 1,137.00     |
|         |              |          | \$ 150.00       |
|         |              |          | \$ 150.00       |

\*\* WORKLOG HISTORY \*\*

| Proj#   | Work Date | Activity Description      | Insp | Time (hrs) | Amount Charged |
|---------|-----------|---------------------------|------|------------|----------------|
| ---313A | 10/06/88  | PLAN REVIEW 1 HR @\$53/HR |      |            | \$53.00        |
| ---313A | 06/08/90  | REPORT REVIEW/MTG W/AL    |      | 1.         | \$60.00        |
| ---313a | 06/08/90  | report review/meet w/Al   |      | 1.         | \$60.00        |
| ---313a | 06/08/90  | dupl.charge               |      |            | -\$60.00       |

\*\* WORKLOG HISTORY \*\*

-----  
\$499.75

Balance:                   -\$393.75    Amount Refunded:                   \$0.00  
=====

| Proj#   | Work Date | Activity Description         | Insp | Time (hrs) | Amount Charged |
|---------|-----------|------------------------------|------|------------|----------------|
| ---313b | 05/12/94  | Plan review                  |      | 1.         | \$75.00        |
| ---313b | 06/15/94  | review letter                |      | 1.         | \$75.00        |
| ---313b | 06/20/94  | site visit                   |      | 0.75       | \$56.25        |
| ---313b | 07/07/94  | Tank pulled                  |      | 5.         | \$375.00       |
| ---313b | 07/12/94  | letter                       |      | 0.5        | \$37.50        |
| ---313b | 07/26/94  | on site inspection           |      | 2.         | \$150.00       |
| ---313b | 07/27/94  | Consultation                 |      | 1.         | \$75.00        |
| ---313b | 08/08/94  | consultiong                  |      | 0.5        | \$37.50        |
| ---313b | 08/08/94  | complted review              |      | 1.5        | \$112.50       |
| ---313b | 08/25/94  | Project Ended/Refund request |      |            | \$0.00         |

-----  
\$993.75

Balance:                   \$0.00    Amount Refunded:                   \$287.25  
=====

| Proj#   | Work Date | Activity Description | Insp | Time (hrs) | Amount Charged |
|---------|-----------|----------------------|------|------------|----------------|
| ---313c | 05/12/94  | partial plan review  |      | 1.5        | \$112.50       |
| ---313c | 05/16/94  | review letter        |      | 2.         | \$150.00       |
| ---313c | 05/16/94  | On-site visit        |      | 1.         | \$75.00        |
| ---313c | 05/16/94  | final plan approved  |      | 0.75       | \$56.25        |
| ---313c | 05/21/94  | on site inspection   |      | 0.75       | \$56.25        |
| ---313c | 06/02/94  | on site evaluation   |      | 1.5        | \$112.50       |
| ---313c | 06/06/94  | On-site visit        |      | 1.5        | \$112.50       |
| ---313c | 06/08/94  | On-site visit        |      | 2.5        | \$187.50       |





01-0100  
SACRAMENTO REGIONAL WATER  
NOV 08 1996 KG  
CONTROL BOARD

November 5, 1996

WORKPLAN ADDENDUM  
for  
SOIL AND GROUNDWATER ASSESSMENT  
at  
Zima Center Corporation  
2951 High Street  
Oakland, California

Submitted by:  
AQUA SCIENCE ENGINEERS, INC  
2411 Old Crow Canyon Road, #4  
San Ramon, CA 94583  
(510) 820-9391




## WORKPLAN ADDENDUM

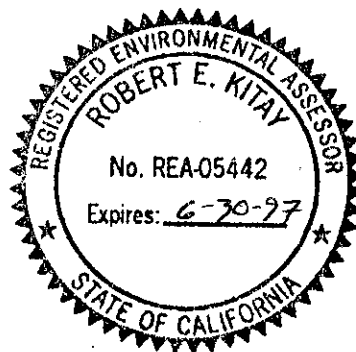
This submittal outlines an addendum to Aqua Science Engineer's, Inc. (ASE) October 15, 1996 workplan for a soil and groundwater assessment at the Zima Center Corporation located at 2951 High Street in Oakland, California. This addendum is to add one additional monitoring well as requested in the Alameda County Health Care Services Agency (ACHCSA) workplan approval letter dated October 28, 1996. See Figure 1 for the location of this additional well. This well will be drilled, constructed, developed and sampled in the same manner described in ASE's October 15, 1996 letter.

Should you have any questions or comments, please feel free to call us at (510) 820-9391.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.

  
Robert E. Kitay, R.E.A.  
Project Geologist



Attachments: Figures 1

cc: Ms. Madhulla Logan, Alameda County Health Care Services Agency,  
1131 Harbor Bay Parkway, Suite 250, Alameda, CA 94502-6577

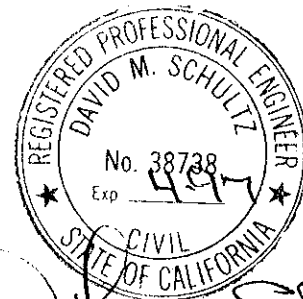
Mr. Kevin Graves, RWQCB, San Francisco Bay Region, 2101 Webster  
Street, Suite 500, Oakland, CA 94612



November 5, 1996

WORKPLAN ADDENDUM  
for  
SOIL AND GROUNDWATER ASSESSMENT  
at  
Zima Center Corporation  
2951 High Street  
Oakland, California

Submitted by:  
AQUA SCIENCE ENGINEERS, INC  
2411 Old Crow Canyon Road, #4  
San Ramon, CA 94583  
(510) 820-9391

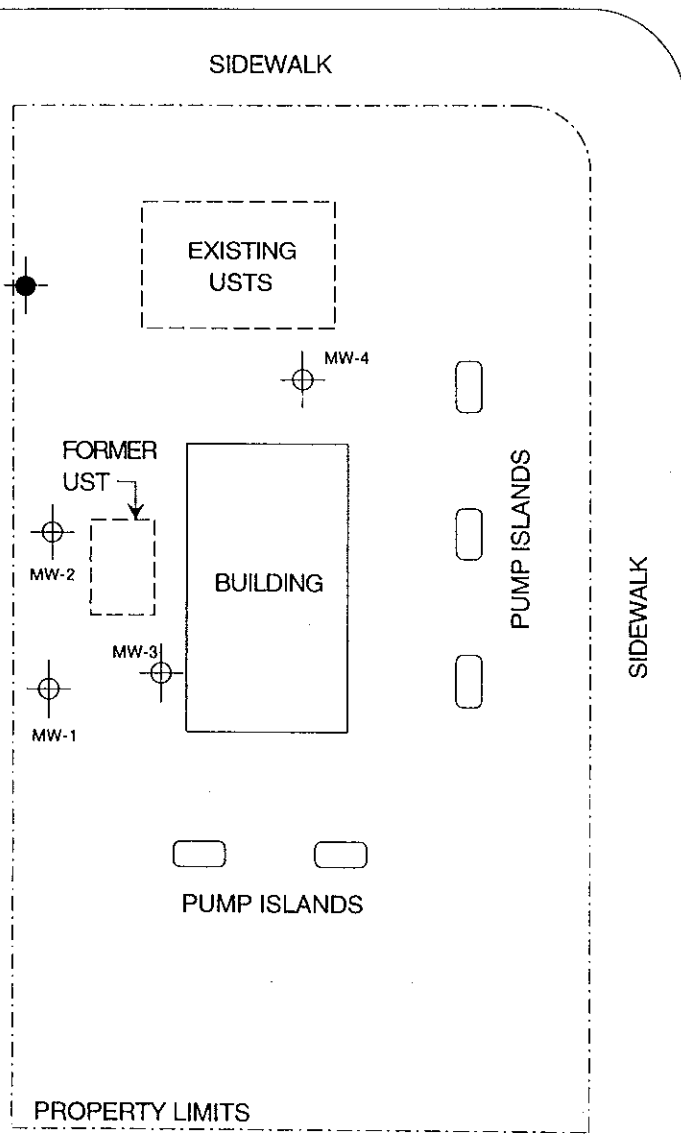


PENNIMAN AVENUE



NORTH

SCALE  
1" = 30'



LEGEND



EXISTING MONITORING WELL



PROPOSED MONITORING WELL

PROPOSED MONITORING  
WELL LOCATION MAP

ZIMA CENTER CORPORATION  
2951 HIGH STREET  
OAKLAND, CALIFORNIA

AQUA SCIENCE ENGINEERS, INC.

FIGURE 2

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

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

September 17, 1996

Mr. Mohammad Mashoon  
2951 High St,  
Oakland, CA - 94619

STID 1038

RE: 2951 High Street, Oakland, CA

Dear Mr. Mashoon:

I am in receipt of the document titled "Report of Soil and Groundwater Assessment", dated July 17, 1996, prepared by Aqua Science Engineers for the above referenced property.

Five borings BHA to BHE were installed on the property to further delineate the extent of contamination from the former underground storage tanks. Both soil and groundwater samples were collected from each of the borings except BHD from which a groundwater sample could not be collected. Significant concentrations of gasoline and BTEX was identified in borings BHA and BHB, the downgradient borings from the tanks.

Based on a review of the document, this Department is requiring that the following additional work be conducted on the property:

- To complete groundwater characterization and define the extent of contamination, a monitoring well should be installed in the downgradient direction to borings, BHA and BHB. This well could serve as a target well to identify any potential contaminant migration to offsite receptors.
- Quarterly monitoring and gradient measurement should be conducted on all onsite monitoring wells at a quarterly frequency. For expedited closure, this Department recommends that more aggressive remediation options be considered to treat the contamination in the groundwater to acceptable standards. Also, in future, if the concentrations of petroleum hydrocarbons reduce significantly, either due to natural biodegradation or due to treatment, then a risk assessment can be conducted on site to evaluate any potential threats to onsite/offsite receptors. A site specific risk assessment conducted on the property can determine cleanup standards that are site specific and based on the assessment this Department could evaluate the site for closure.

Please submit a work plan to address the above listed concerns within 30 days from the receipt of this letter. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,



Madhulla Logan,  
Hazardous Material Specialist

C: Robert Kitay, Aqua Science Engineers Inc, 2411 Old Crow Canyon Rd, #4,  
San Ramon, CA - 94583.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



October 28, 1996

**Mr. Mohammad Mashoon**  
2951 High St,  
Oakland, CA - 94619

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

**STID 1038**

**RE: 2951 High Street, Oakland, CA**

Dear Mr. Mashoon:

I am in receipt of your workplan for soil and groundwater assessment, dated October 15, 1996 for the above referenced property. This workplan is acceptable with the following changes:

- The workplan includes a well placement in the corner of Penniman Avenue, downgradient to BH-B (assuming a northerly gradient). However, this does not address the high concentrations of gasoline and BTEX observed during the previous investigation from samples collected from borings, BH-A and BH-B. Hence, an additional monitoring well needs to be installed between BH-A and BH-B and as close to the property boundary line adjacent to the residential site. This will give more accurate data on the contamination levels present in this area and on the groundwater gradient and depth.

Based on the results of this investigation (to be implemented), this Department may require that a remediation plan be submitted to mitigate the risk to public health and water quality.

The workplan with the modification listed above should be implemented within 30 days from the date of this letter. Any extension should be requested in writing. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

Madhulla Logan  
Hazardous Material Specialist

C: **Robert Kitay**, Aqua Science Engineering, Inc, 2411 Old Crow Canyon road, #4  
San Ramon, CA 94583

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

June 18, 1996

Mr. Clifford Lee  
645 16th Avenue  
San Francisco, CA - 94118

Ref : Zima - 2951 High Street, Oakland, CA 94619

Dear Mr. Lee:

In response to your request, the site was re-evaluated to make a determination as to whether you should be continued to be named as one of the responsible parties or be removed from any responsibility involving investigations and cleanup of the referenced property. Based on further review of the site history, this Department has decided to remove you from site responsibility and an updated "Notice of Requirement to Reimburse" letter (attached) has been sent to the concerned individuals.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan  
Hazardous Material Specialist

CC: Mohammed Mashoon, Zima Center Inc, 2951 High Street, Oakland, CA - 94619  
Lori Cassias, State Water Resources Control Board, Division of Clean Water Program,  
P.O 944212, Sacramento, CA - 94244-2120.



ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

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

Certified Mail # P 143 588 335  
06/17/96  
STID# 1038

Notice of Requirement to Reimburse

Mahammed Mashoon  
Zima Center Inc.  
2951 High St.  
Oakland, Ca 94619

Responsible Party (RP)  
Property Owner

High St. ARCO  
2951 High St  
Oakland , CA 94619

SITE


Date First Reported 03/23/90  
Substance: Gasoline  
Petroleum: (X)Yes  
Source: F

The federal Petroleum Leaking Underground Storage Tank Trust Fund (Federal Trust Fund) provides funding to pay the local and state agency administrative and oversight costs associated with the cleanup of releases from underground storage tanks. The legislature has authorized funds to pay the local and state agency administrative and oversight costs associated with the cleanup of releases from underground storage tanks. The direct and indirect costs of overseeing site investigation or remedial action at the above site are funded, in whole or in part, from the Federal Trust Fund. The above individual(s) or entity(ies) have been identified as the party or parties responsible for investigation and cleanup of the above site. **YOU ARE HEREBY NOTIFIED** that pursuant to Title 42 of the United States Code, Section 6991b(h)(6) and Section 25297.1 of the California Health and Safety Code, the above Responsible Party or Parties must reimburse the State Water Resources Control Board (SWRCB) not more than 150 percent of the total amount of site specific oversight costs actually incurred while overseeing the cleanup of the above referenced underground storage tank site, and the above Responsible Party or Parties must make full payment of such costs within 30 days of receipt of a detailed invoice from the SWRCB.

A determination of a secondary RP status may be made if it is shown that one or more of the RP(s) is performing corrective action and it is clear that the party seeking secondary status did not in any way initiate or contribute to the actual discharge. If the primary RP fails to perform corrective action, then the secondary RP will be considered a primary RP. To request designation as a secondary RP, contact this office.

Reimburse Letter  
06/17/96  
StID# 1038  
Page 2

Any action or inaction by this local agency associated with corrective action, including responsible party identification, is subject to petition to the SWRCB. Petitions must be filed within 30 days from the date of the action/inaction. To obtain petition procedures, Please fax your request to Roni Riley at the SWRCB at (916) 227-4349 telephone the SWRCB at (916) 227-4408.  
Please contact Madhulla LOGAN, Hazardous Materials Specialist at this office if you have any further questions concerning this matter.

  
Gordon Coleman, Acting Chief  
Contract Project Director

c: Lori Casias, SWRCB

Please Circle One    Add   Delete   Change

Reason: Delete RP # 2  
*Clifford Lee*



837-4853

**FAX BEING SENT BY:**

**Aqua Science Engineers, Inc.**  
 2411 Old Crow Canyon Road, #4  
 San Ramon, CA 94583  
 Phone (510) 820-9391  
 Fax (510) 837-4853

DATE: 5-29-96

TO: Madhulla Logan

FROM: Robert Kitay

NUMBER OF PAGES TO FOLLOW: 5

\*\*\*\*\*Please Phone If This FAX Is Received Incomplete\*\*\*\*\*

**MESSAGE:**

Please call me once you have had a chance to look this over.

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~~1-222~~

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May 29, 1996

Mr. Mohammad A. Mashhoon  
Zima Center Corporation  
2951 High Street  
Oakland, CA 94619

SUBJECT: ASE PROPOSAL #96-138  
SOIL AND GROUNDWATER ASSESSMENT  
2951 High Street  
Oakland, California

Dear Mr. Mashhoon:

Aqua Science Engineers (ASE) is pleased to submit this proposal to conduct a soil and groundwater assessment at the above-referenced site. The scope of work for this assessment is as follows:

SCOPE OF WORK

- 1) Prepare a workplan and health and safety plan for review and approval from the appropriate regulatory agencies.
- 2) Obtain the necessary drilling permit from the Alameda County Flood Control and Water Conservation District (Zone 7).
- 3) Drill three soil borings at the site to approximately 20-feet below ground surface (bgs) using a Geoprobe or similar type of drill rig.
- 4) Collect soil and groundwater samples from each boring and analyze one soil and one groundwater sample from each boring at a CA-EPA certified analytical laboratory for total petroleum hydrocarbons as gasoline (TPH-G) by modified EPA Method 5030/8015 and benzene, toluene, ethylbenzene and total xylenes (BTEX) and MTBE by EPA Method 8020.
- 5) Backfill each boring with neat cement.

- 6) Collect groundwater samples from monitoring well MW-4 and analyze the groundwater samples for TPH-G by modified EPA Method 5030/8015 and BTEX and MTBE by EPA Method 8020.
- 7) Prepare a report presenting the methods and findings of this assessment.

### COSTS

All items as described above \$3,960.00

This price includes analytical services on a standard seven working day turnaround. Faster turnaround is available if required at additional cost.

### **PAYMENT**

The payment schedule for services rendered will be as follows: 50% of the fixed proposal amount will be due upon initiation of the project; 50% of the fixed proposal amount will be due upon clients receipt of the report. The report will not be released until final payment is made. Client agrees to pay interest at the rate of one-and-one-half percent (1.5%) per month on any and all balances not paid by due date. Client also agrees to pay all court costs, attorney fees, and other expenses incurred by bidder in the event Client fails to make payment(s) when due and bidder undertakes litigation to enforce collections.

### **LIMITATIONS**

The purpose of the proposed assessment is to identify and characterize possible subsurface soil and/or groundwater contamination at the subject site. Because the extent of soil and/or groundwater contamination is currently not known, it is not possible to guarantee a complete definition of the entire extent of contamination. Additional drilling, soil and groundwater sampling, and analyses may be required to complete this assessment. The performance of any additional services above and beyond those detailed in the above-referenced scope of work will be charged as additional costs pending prior approval of the additional services by the client.

ASE will contact Underground Service Alert to mark public utilities on public property. ASE requires that all private utilities be marked by the

property owner. ASE will not be responsible for damage to any unmarked utilities during drilling or other work related to this project.

The price stated above does not include any fees that may be imposed by regulatory agencies other than those fees required to obtain the permits stated above. Any other fees that may be imposed by regulatory agencies will be billed directly to the client.

### GENERAL TERMS

We at Aqua Science Engineers, Inc. and its' subcontractors can assure you that this job will be executed in a responsible and timely fashion consistent with the needs and purposes of the project. Any down time or delays due to scope of work changes, or costs associated with damage to any unmarked utilities shall be charged out Aqua Science Engineers' hourly rates.

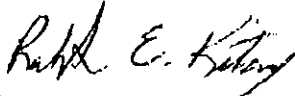
Should you wish to have this work proceed as outlined above, please sign the attached "Authorization to Proceed" and Aqua Science Engineers will contact the client upon receipt to determine a firm start date. This proposal constitutes a firm offer to conduct the scope of services herein. One copy of this Authorization to Proceed document is to be signed and returned to Aqua Science Engineers prior to commencement of work.

THIS QUOTATION IS VALID FOR A PERIOD OF THIRTY (30) DAYS FROM DATE OF THIS LETTER.

Aqua Science Engineers appreciates the opportunity to provide you with this quotation. We look forward to assisting you with your environmental needs. Should you have any questions or comments, please feel free to give us a call at (510) 820-9391.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.

  
Robert E. Kitay, R.E.A.  
Project Geologist





**Aqua Science Engineers, Inc.**  
 2411 Old Crow Canyon Road, #4  
 San Ramon, CA 94583  
 (510) 820-9391

**AUTHORIZATION TO PROCEED**

Date: May 29, 1996

Client: Mr. Mohammad A. Mashhoon  
 Zima Center Corporation  
 2951 High Street  
 Oakland, CA 94619

I, \_\_\_\_\_, have read and understand all of the terms and conditions that are included as a part of this proposal. I authorize this work in accordance to the scope of work as stated in ASE proposal 96-138.

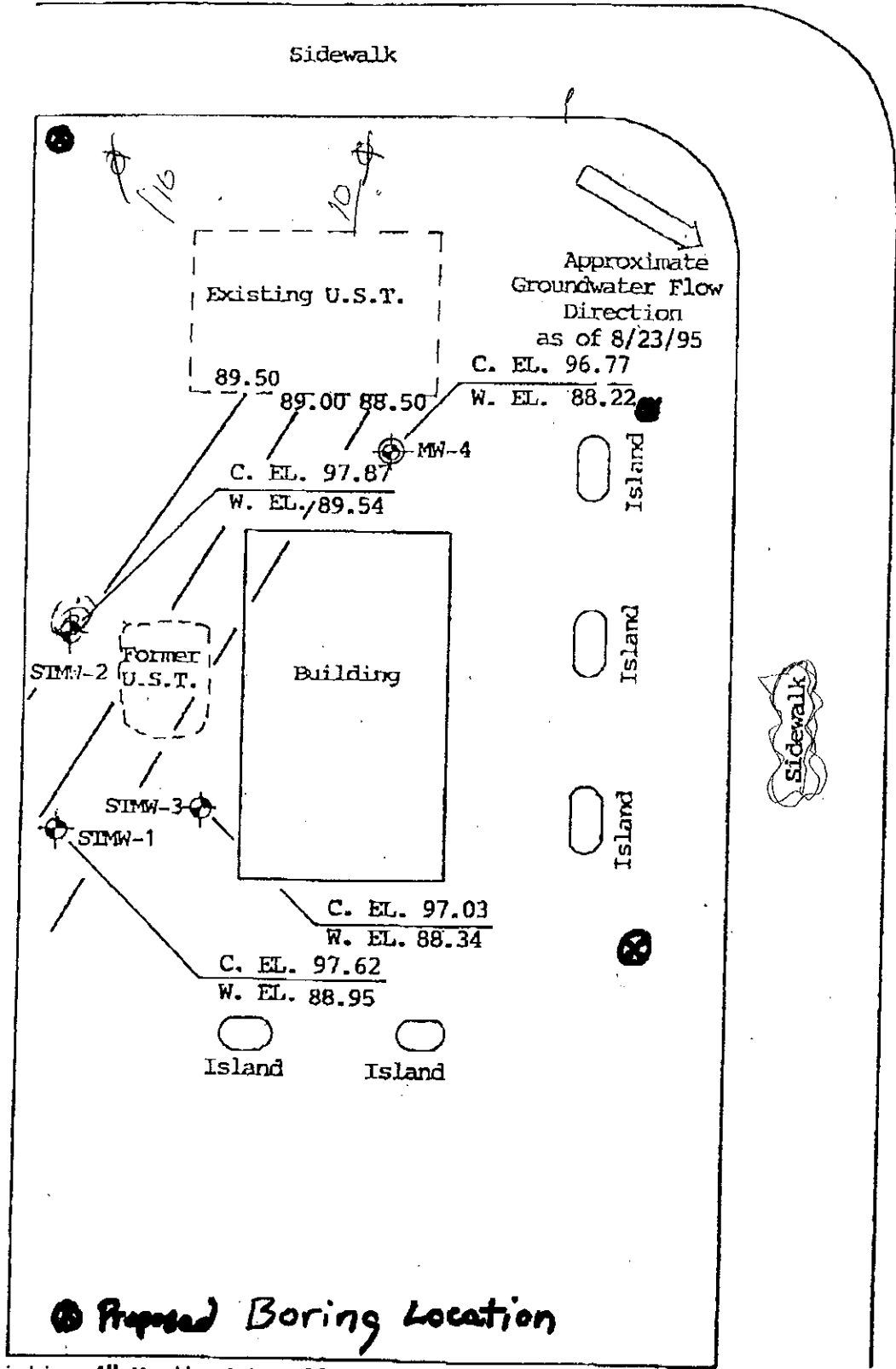
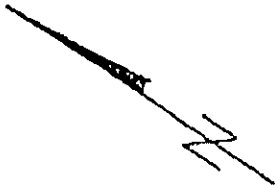
Project Cost Not To Exceed \$3,960.00

For Client: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

**Aqua Science Engineers, Inc.**

Name: Robert Kitay  
 Signature: Robert E. Kitay  
 Date: 5-29-96

PENNIMAN AVENUE



*Mostly from south*

*Handwritten signature*

⊗ Proposed Boring Location

⊗ Existing 4" Monitoring Well      C. EL. Casing Elevation  
 ⊙ Monitoring Well                      W. EL. Water Elevation

SCALE: 1"=20'

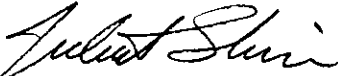
Figure 2



Mr. Mahammed Mashoon  
RE: 2951 High St.  
December 15, 1992  
Page 2 of 2

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Gil Jensen, Alameda County District Attorney's Office

Mark Thompson, Alameda County District Attorney's Office

Edgar Howell-File (JS)

To: MRS Madhulla Logan

FROM: ZIMA C. INC  
Mohammad A Mashhoon

STED # 1038

proposal & work plan

please call MO. at

cell # 436-4700



2055 Junction Avenue  
San Jose, California 95131 2106  
408-094-1200  
Fax: 408-894 0701

March 21, 1996

IT Proposal No. 763828.96000227

Mr. Mohammad Mashoon  
2951 High Street  
Oakland, California 94619

Subject: **Proposal for Soil Investigation and Groundwater Monitoring and Sampling**  
2951 High Street  
Oakland, California 94619

Dear Mr. Mashoon:

IT Corporation (IT) is pleased to present this proposal for a limited soil investigation and monitoring and sampling at the above referenced site. This proposal was prepared in response to your request that we address the requirements raised in the letter from the Alameda County Department of Environmental Health (ACDEH) dated March 11, 1996.

- **Down Gradient Monitoring Well**

Based on the results of the most recent monitoring and sampling event, well MW-4 is generally located down gradient of the underground storage tank (UST) locations. This existing well should satisfy this requirement.

- **Define Extent of Soil Contamination**

We propose to complete additional soil investigation in the vicinity of the UST locations using Geoprobe sampling equipment. At least three borings will be completed, based on field screening and discussion with you in the field, additional borings may be collected if necessary.

- **Source Removal**

It is premature to prepare a source removal plan. An adequate source removal plan will be prepared, if necessary, following additional soil investigation, described above, to assess the extent of soil impact.

- **Status of Sump**

It is our understanding that your personnel will clean the sump on the property and that wastes generated will be drummed and stored pending proper disposal.

*was cleaned and disposed by Harbor Oil Co. some time ago.*

INTERNATIONAL TECHNOLOGY CORPORATION

**Mr. Mohammad Mashoon****March 21, 1996****Page 2**

- **Monitoring and Sampling of Wells**

As requested in the letter, monitoring wells MW-2 and MW-4 will be monitored and sampled quarterly for the next four quarters. Wells MW-1 and MW-3 will be monitored semi-annually for the same period. Samples will be analyzed for total petroleum hydrocarbons as gasoline (TPH-G) and benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA methods 8015 and 8020.

**SCOPE OF WORK****Task 1. Planning and Permits**

Before beginning field activities, IT will prepare a work plan and a site-specific Health and Safety Plan (HASP). The work plan will describe field procedures and methods used to accomplish the scope of work and will be submitted to the ACDEH for review and approval. The HASP is an integral part of our field operating procedures and is based on the understanding that unsafe materials may be present, and is intended to minimize exposure to IT personnel and subcontractors during field work. The HASP lists safety procedures for work to be performed, on site safety officers, and preferred medical emergency locations.

**Task 2. Underground Utility Location**

Prior to drilling, Underground Service Alert (USA) will be notified to identify the location of underground utilities and potential interferences. Additionally, a private utility locator will be used to locate any additional on site utilities.

**Task 3. Soil Borings**

At least three soil borings will be completed using a truck-mounted Geo-probe. Borings will be located in the vicinity of the former UST location to assess the presence of residual hydrocarbon concentrations in soil and select treatment well locations. During advancement, soil samples will be collected within each borehole at approximate depths of 5 and 10 feet below grade and at the capillary fringe for potential laboratory analysis. A portion of the sample not retained for laboratory submittal, will be used to observe soil conditions, monitor for organic vapors and classify soil lithology. A log of each soil boring will be maintained by the field geologist to document the soil types and conditions encountered during drilling. Field screening for organic vapors will be accomplished using a photo ionization detector (PID).

It is not anticipated that any soil wastes will be generated by the Geo-probe equipment. Procedures for drilling, logging, and soil sampling will be performed under the direction of a California Registered Geologist in accordance with IT's technical procedures.

Mr. Mohammad Mashoon

March 21, 1996

Page 3

Task 4. Groundwater Monitoring and Sampling

All wells will be monitored quarterly and sampled quarterly and semi-annually as described above. The depth to water in each well will be measured to the nearest 0.01 foot from the top of the casing using an electronic meter. Each well will be purged until the field parameters of temperature, conductivity and pH stabilize. Field parameters will be recorded on a field data sheet.

Each monitoring well will be checked for floating product and sheen. Using disposable bailers, a minimum of three casing volumes of water will be purged from each well. After the water level in each well has recovered to at least 80% of its original level, a sample will be collected and placed into appropriate containers supplied by the analytical laboratory. Each sample container will be labeled and placed into a cooler with ice to cool the samples and maintain them at a temperature of approximately 4°C during transportation. Proper chain of custody protocol will be followed at all times. All water generated from the wells will be stored on site in properly labeled DOT-17H rated 55-gallon drums, pending laboratory analysis for proper disposal.

Task 5. Laboratory Analyses

Soil samples collected from the monitoring wells will be submitted to Entech Analytical, a California-certified analytical laboratory, for analysis. The samples will be analyzed for total petroleum hydrocarbons as gasoline (TPH-G), and benzene, toluene, ethylbenzene, and total xylene (BTEX) using EPA Method 8015 (modified) and 8020.

Task 6. Report Preparation

Upon completion of the above tasks, a report presenting results, findings and conclusions of the field investigation will be submitted for review, prior to submittal to applicable regulatory agencies. The report will be completed under the direction of a California Registered Geologist and will include a description of work performed, findings, conclusions, recommendations, figures, and tables. Figures and tables will include the following: Site Vicinity Map, Site Plan, Groundwater Elevation Contour Map, and laboratory results. In addition, quarterly reports will be prepared following each monitoring event.

Mr. Mohammad Mashoon  
March 21, 1996  
Page 4

The estimated costs for the above activity is included as an attachment. If you should have any questions, or require any additional information, please contact me at (408) 894-1200. We look forward to working with you on this project.

Respectfully submitted,  
IT CORPORATION



Matthew J. Hopwood, R.G.  
Geosciences Manager

INTERNATIONAL TECHNOLOGY CORPORATION

**COST ESTIMATE**

| <u>ACTIVITY</u>                                | <u>COST</u>     |
|------------------------------------------------|-----------------|
| Soil Borings and Report                        | \$ 3,688        |
| Monitoring and Sampling (one year) and Reports | 4,256           |
| <b>Total Estimated Cost</b>                    | <b>\$ 7,944</b> |

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

March 11, 1996

**Mr. Mohammad Mashoon**  
2951 High St,  
Oakland, CA - 94619

**STID 1038**

**RE: 2951 High Street, Oakland, CA**

Dear Mr. Mashoon:

I am in receipt of the Quarterly Groundwater Monitoring report dated, December 19, 1995 for the above referenced site. All the pertinent records submitted to this Department has been reviewed for site evaluation.

In March 1990, a phase II investigation was conducted by McLaren Hart on the referenced property in response to the occurrence of a surface spill during a tank overflow, and observed surface stains on the site. Also, an on-site sump located east of the fuel tanks in a depressed area was full to capacity with a liquified material whose surface appeared to be covered with an undetermined thickness of gasoline. The report indicates that the sump's content was removed on February 15, 1990 by Haber Oil and the integrity of the sump's floor and walls were not known at the time of the removal. Subsequently, 1 soil boring was installed approximately 10 feet downgradient from the underground storage tank (UST) area which was converted into a monitoring well. Gasoline was found upto 460 ppm in the soil samples collected at the depth of 5 ft although no gasoline was found at the depths of 10 and 15 ft in the same boring. Gasoline and benzene were found in the groundwater samples at concentrations of 1200 ppb and 72 ppb respectively.

United Soil Engineering report, dated April 12, 1990 mentions that a subsurface investigation consisting of two exploratory borings was conducted on March 23, 1990 in response to signs of oil spillage on the property. Soil samples were collected from depths of 5 feet and 12 feet from the two borings. The laboratory results of the soil samples collected at depths of 5 feet indicate concentrations of 620 ppm and 59 ppm of low boiling hydrocarbons and 1900 ppb of benzene. The concentrations decreased in the 12 feet samples.

In September 1993, a 300 gallon waste oil tank was removed. Samples collected during the removal indicated gasoline up to 40 ppm, and benzene up to 130 ppb. About 30 cubic yards of soil was removed from the waste oil tank area and confirmation soil samples collected at the bottom of the excavation indicated concentrations of gasoline and oil and grease up to 3 ppm and 3700 ppm respectively. No benzene was found. Perchloroethylene was found at concentrations ranging from 5 ppb to 42 ppb.



In August 1994, 4 soil boring were drilled and 3 of them were converted into monitoring wells. The monitoring wells have been sampled for 4 quarters since February 1995. Benzene has consistently been found in monitoring well, MW-2 at concentrations of up to 110 ppb.

Based on the site evaluation, this Department has identified the following concerns:

1. Although petroleum hydrocarbons has consistently been identified in the soil and groundwater sample collected near the fuel underground storage tanks, no remediation has yet been conducted and the extent of soil and groundwater contamination has not been defined.
2. Also, no information has been submitted about the status of the sump mentioned in the McLaren Hart report.

Please submit a work plan to this Department within 30 days from the date of this letter to address the above concerns and include the following requirements as part of your proposal:

1. At least one monitoring well should be located downgradient (based on a northerly groundwater flow) to the existing fuel USTs..
2. Since the soil samples collected in the previous investigations around the USTs were found to contain significant concentrations of petroleum hydrocarbons, the extent of this contamination has to be defined.
3. Based on the concentrations of petroleum hydrocarbons found in the soil samples, an adequate source removal plan should be included.
4. Include information on the status of the sump referenced in the McLaren Hart's report. Also, submit adequate disposal records for the gasoline pumped out of this sump.
5. Since benzene has consistently been found in monitoring well, MW-2, continue monitoring this well on a quarterly frequency and report the groundwater flow data for every quarter. Also in the future, monitoring well, MW-4 should be included in the quarterly monitoring events. However, monitoring wells, MW-1 and MW-3 can be monitored on a semi-annual frequency.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). If you have any questions, you may reach me at (510) 567-6764.

Sincerely,



Madhulla Logan,  
Hazardous Material Specialist

ENVIRONMENTAL  
PROTECTION  
96 MAR -4 AM 9:36

March 1, 1996

Alameda County Health Agency  
Division of Environmental Protection

Attention: Mrs. Madhulla Logan

Dear Ms. Logan,

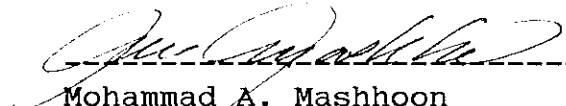
As you recall our meeting in November of 95 with the presence of the geologist from Agua Technology Inc. for requesting our site closure located at 2951 High Street in Oakland. At such time you requested the submission of the final quarterly results of monitoring well at our property. Such report was conducted in December of 95 by Soil Tech Engineering and the results have been submitted to your office.

I have placed several calls to your office to find out your decision on the site closure. Due to your heavy work load you indicated to us that you have not been able to finalize our request.

As you know, we submit a proposal in August of 93 for the presence of the Alameda County hazardous materials specialist at the time of removal of our underground waste oil storage tank. After the removal of such tank, we found some contamination due to the leaky tank. Then at the request of the hazardous material specialist we had removed contaminated soil, and such soil was disposed properly. In September of 94 we submitted a proposal of our preliminary site assessment plan, and it was approved for installing four borings and three monitoring wells. The plan was submitted by Soil Tech Engineering and monitoring wells were installed. Also, results of the quarterly monitoring wells were submitted to Alameda County, of which the final result was submitted on December of 95. Since the results of the investigation report and threat to the ground water was minimal, and as you know, this is not drinking water supply. Such reports also indicated that contamination of the non-drinking water was decreasing. I also would like to mention that in August of 94 we double lined our tanks, and this was done with Alameda County hazardous material specialist supervision and approval, and also the tanks and lines were equipped with computerized tank monitoring systems to comply for 1998 regulations.

ENVIRONMENTAL  
PROTECTION  
96 MAR -4 AM 9:36

We would like to formally request from you for a site closure statement, and receive a no further environmental investigation action letter from you for our property.

  
-----  
Muhammad A. Mashhoon  
Zima Center Inc.  
2951 High Street  
Oakland, Ca. 94619  
510-436-4700

\* I am enclosing the recommendation that was given to us by Soil Tech Engineering regarding this matter.

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

June 18, 1996

Mr. Clifford Lee  
645 16th Avenue  
San Francisco, CA - 94118

Ref: Zima - 2951 High Street, Oakland, CA 94619

Dear Mr. Lee:

In response to your request, the site was re-evaluated to make a determination as to whether you should be continued to be named as one of the responsible parties or be removed from any responsibility involving investigations and cleanup of the referenced property. Based on further review of the site history, this Department has decided to remove you from site responsibility and an updated "Notice of Requirement to Reimburse" letter (attached) has been sent to the concerned individuals.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan  
Hazardous Material Specialist

CC: Mohammed Mashoon, Zima Center Inc, 2951 High Street, Oakland, CA - 94619  
Lori Cassias, State Water Resources Control Board, Division of Clean Water Program,  
P.O 944212, Sacramento, CA - 94244-2120.



**Chevron**

January 18, 1996

**Chevron U.S.A. Products Company**

6001 Bollinger Canyon Road  
Building L  
San Ramon, CA 94583  
P.O. Box 5004  
San Ramon, CA 94583-0804

Ms. Madhulla Logan  
Alameda Co. Dept. of Environmental Health  
1131 Harbor Bay Pkwy, 2nd Floor  
Alameda, CA 94502-6577

**Marketing – Northwest Region**  
Phone 510 842 9500

Re : Chevron Service Station 9-8341  
3530 Macarthur Blvd., Oakland, California

Dear Ms. Logan :

Attached is the revised site plan from Touchstone Developments (Touchstone). You should have already received a copy of this site plan earlier from Touchstone. Chevron will need your approval in writing before proceeding with the investigation. Again, the exact location may differ because of underground utilities, overhead obstructions, and/or city ordinances. If you have any questions or comments, please feel free to give me a call at (510) 842-8752.

Sincerely,  
Chevron U.S.A. Products Co.

Kenneth Kan  
Engineer

LKAN/98341R04

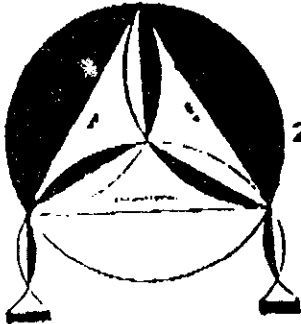
Enclosure

cc : Mr. Richard Hiatt, RWQCB-S.F. Bay Region  
2101 Webster St., Ste. 500, Oakland, CA 94612

Mr. Ronald J. Owcarz, Alameda County Environmental Health  
1131 Harbor Bay Pkwy, 2nd Flr., Alameda, CA 94502-6577

Ms. Bette Owen, Chevron U.S.A. Products Co.

Mr. Tim Walker, Touchstone Developments (w/o enclosure)  
17170 Keaton Ave., Sonoma, CA 95476



# SOIL TECH ENGINEERING

Soil, Foundation and Geological Engineers

298 BRICKLAW ROAD, SANTA CLARA, CA 95050 ■ (408) 496-0265 OR (408) 496-0266

August 11, 1995

Mr. Mohammad A. Mashhoon  
Zima Center Corporation  
2951 High Street  
Oakland, California 94619

ENVIRONMENTAL  
PROTECTION  
SECTION  
SSMR-4 AM 9:36

Dear Mr. Mashhoon:

This letter is to confirm my conversation with Ms. Linda Chen with the Money Store regarding your site located 2951 High Street, in Oakland, California.

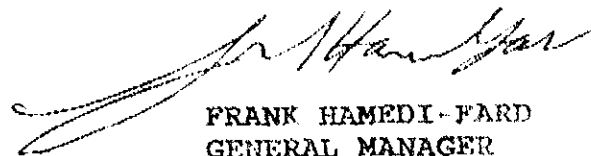
During my phone conversation, I mentioned that contaminated soil around the underground waste oil tank has been removed and threat to the groundwater is minimal based on the results of our investigation reports dated September 20, 1993 "Soil Sampling Below Removed Underground Storage Tank", December 15, 1993 "Remedial Excavation Activities", March 8, 1995 "Preliminary Site Assessment" and June 13, 1995 "Quarterly Groundwater Monitoring and Sampling".

Furthermore, I mentioned that there is minor water contamination in the vicinity of the removed underground storage tank which has improved during the last quarter monitoring and sampling. Also, this property has been approved by UST Cleanup Fund Program to received upto \$990,000 for soil and groundwater cleanup.

If you have any questions or require additional information, please feel free to contact our office at (408) 496-0265.

Sincerely,

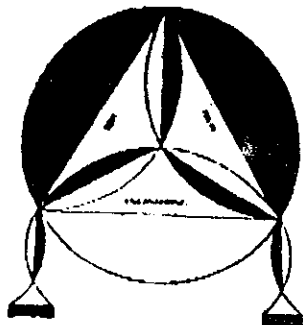
SOIL TECH ENGINEERING, INC.

  
FRANK HAMEDI-FARD  
GENERAL MANAGER

08-15-1995 12:42PM FROM

TO

1510634055 FAX



# SOIL TECH ENGINEERING

Soil, Foundation and Geological Engineers

298 BROOKAW ROAD, SANTA CLARA, CA 95050 ■ (408) 496-0265 OR (408) 496-0266

August 15, 1995

Ms. Linda Chen  
The Money Store Investment Corporation  
3301 C Street, Suite 301  
Sacramento, California 95816

Regarding: 2951 High Street, Oakland, CA

Dear Ms. Chen:

This is respond to your letter dated August 14, 1995, for the property located at 2951 High Street, Oakland, California.

Item 1) Soil Tech Engineering's report dated March 8, 1995, for preliminary site assessment may be used as a reliable report for condition of soil and groundwater.

Item 2) Based on our experience and similar site in Alameda County, the maximum budget require for additional 2 quarters monitoring & sampling and site closure will be \$15,000 to \$20,000.

If you have any questions or require additional information, please feel free to contact our office at (408) 496-0265.

Sincerely,

SOIL TECH ENGINEERING, INC.

*Frank Hamedifard*  
FRANK HAMEDI-FARD  
GENERAL MANAGER

95 MAR -11 AM 9:36  
ENVIRONMENTAL  
PROTECTION

**SCS ENGINEERS**

Offices Nationwide

May 24, 1995  
File No. 0388028.06

Ms. Madhulla Logan  
Alameda County Health Care Services Agency  
Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, California 94502

Subject: Draft Monitoring Well Completion Report for UST Select Sites;  
Underground Storage Tank Investigation, PN 306  
Oakland Army Base, Oakland, California

ENVIRONMENTAL  
PERMISSION  
95 MAY 25 AM 9:59

Dear Ms. Logan:

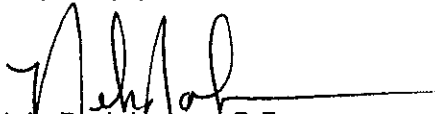
SCS Engineers (SCS) is pleased to provide the enclosed copy of the 90 percent submittal of the subject report. The report outlines field activities, chemical data quality assurance procedures, analytical results, conclusions, and recommendations for this investigation. This report was prepared in accordance with the work and services described in the USACE Supplemental Scope of Work dated October 5, 1993 and revised February 22, 1994.

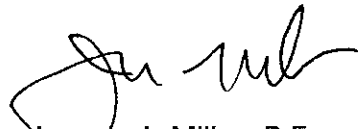
The purpose of the 90 percent submittal is to allow review groups and agencies providing oversight an opportunity to make final adjustments/clarifications to the work. We request that your review comments (if any) be forwarded, in writing, to Mr. Les Schmittner at the address shown below on or before June 14, 1994. The final submittal will incorporate all authorized revisions.

US Army Corps of Engineers, Sacramento District  
Attn: CESP-K-ED-EB, Lester Schmittner  
1325 J Street  
Sacramento, California 95814-2922

If you have any questions, please call either of the undersigned at (510) 829-0661.

Very truly yours,

  
Nels R. Johnson, P.E.  
Project Manager  
SCS ENGINEERS

  
Joseph J. Miller, P.E.  
Project Director  
SCS ENGINEERS

NRJ/JJM:sar  
Attachment





## STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS  
 2014 T STREET, SUITE 130  
 P.O. BOX 944212  
 SACRAMENTO, CALIFORNIA 94244-2120  
 (916) 227-4307  
 (916) 227-4530 FAX



NOV 09 1994

Zima Center Corporation  
 Attn: Mohammad A. Mashhoon  
 2951 High Street  
 Oakland, CA 94619

**UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 008355, FOR SITE ADDRESS: 2951 High Street, Oakland, CA 94619**

The State Water Resources Control Board (SWRCB) takes pleasure in issuing the attached Letter of Commitment in an amount not to exceed **\$20,000**. This Letter of Commitment is based upon our review of the corrective action costs incurred to date and your application received on February 10, 1994 and may be modified by the SWRCB in writing by an amended Letter of Commitment.

**The SWRCB will take steps to withdraw this Letter of Commitment after 90 calendar days from the date of this transmittal letter unless you proceed with due diligence with your cleanup effort.** This means that you must take positive, concrete steps to ensure that corrective action is proceeding with all due speed. For example, if you have not started your cleanup effort, you must obtain three bids and sign a contract with one of these bidders within 90 calendar days. If your cleanup effort has already started and was delayed, you must resume the expenditure of funds to ensure that your cleanup is proceeding in an expeditious manner. You are reminded that you must comply with all regulatory agency time schedules and requirements. We constantly review the status of all active claims, and failure to proceed with due diligence will be grounds for withdrawal of this Letter of Commitment.

**You should read the terms and conditions listed in the Letter of Commitment. Also-attached you will find:**

- A "Reimbursement Request Instructions" package. **You should retain this package for future reimbursement requests.** Among other information, the package includes instructions for completion of the "Reimbursement Request" form and the "Spreadsheet". These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in these instructions are samples of Reimbursement Request forms and completed Spreadsheets. Within the package also included are:
  - A "Bid Summary Sheet" to document data on bids received.
  - Recommended Minimum Invoice Cost Breakdown.
  - A "Certification of Non-Recovery From Other Sources" which must be returned before any reimbursements can be made.
- "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.
- "Vendor Data Record" (Std. Form 204) which must be completed and returned with your first Reimbursement Request.

If you have any questions regarding the Letter of Commitment or the Reimbursement Request package, please contact Blessy Torres at (916) 227-4535.

Sincerely,

Dave Deaner, Manager  
 Underground Storage Tank  
 Cleanup Fund Program

## Attachments

cc: California Regional Water Quality  
 Control Board, San Francisco Bay Region  
 Attn: R. Ritchie  
 2101 Webster Street, Suite 500  
 Oakland, CA 94612

Alameda County EHD  
 Attn: Tom Peacock  
 1131 Harbor Bay Pkwy, 2nd Floor  
 Alameda, CA 94502-6577

# LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 008355

AMENDMENT NO: 0

CLAIMANT: Zima Center Corporation  
CO-PAYEE: None

BALANCE FORWARD: \$0

THIS AMOUNT: \$20,000

CLAIMANT ADDRESS: **Attn: Mohammad A. Mashhoon**  
2951 High Street  
Oakland, CA 94619

NEW BALANCE: \$20,000

TAX ID / SSA NO.: 94-3069306

Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse Zima Center Corporation (Claimant) for eligible corrective action costs at High Street Gas Station 2951 High Street, Oakland, CA 94619 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$20,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 25th day of October, 1994.

STATE WATER RESOURCES CONTROL BOARD

BY   
\_\_\_\_\_  
Manager, Underground Storage Tank Cleanup Fund Program

BY   
\_\_\_\_\_  
Chief, Division Administrative Services

STATE USE :  
CALSTARS CODING :  
0550 - 569.02 - 30530

\$ \_\_\_\_\_

Am 7/2/93

VF

# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

|                                                                                  |                                                                                                                                  |                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EMERGENCY<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | FOR LOCAL AGENCY USE ONLY<br>HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE |
|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                          |        |        |      |
|--------------------------|--------|--------|------|
| REPORT DATE<br>01/5/2005 | CASE # | SIGNED | DATE |
|--------------------------|--------|--------|------|

|             |                                                                                                                                                                                 |                                                      |                                      |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------|
| REPORTED BY | NAME OF INDIVIDUAL FILING REPORT<br>MOHSEN AL-BARAZI                                                                                                                            | PHONE<br>(415) 234-3801                              | SIGNATURE<br><i>Mohsen Al Barazi</i> |
|             | REPRESENTING<br><input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER | COMPANY OR AGENCY NAME<br>JEDCO Consulting Engineers |                                      |
|             | ADDRESS<br>930 Dwight Way STREET<br>CITY Berkeley STATE CA ZIP 94710                                                                                                            |                                                      |                                      |

|                   |                                                                       |                                  |                         |
|-------------------|-----------------------------------------------------------------------|----------------------------------|-------------------------|
| RESPONSIBLE PARTY | NAME<br>Haber Oil Products <input type="checkbox"/> UNKNOWN           | CONTACT PERSON<br>Richard Wilson | PHONE<br>(415) 935-3806 |
|                   | ADDRESS<br>220 Hookston Road<br>CITY Pleasant Hill STATE CA ZIP 94523 |                                  |                         |

|               |                                                                      |          |                         |
|---------------|----------------------------------------------------------------------|----------|-------------------------|
| SITE LOCATION | FACILITY NAME (IF APPLICABLE)<br>ARCO                                | OPERATOR | PHONE<br>(415) 261-1111 |
|               | ADDRESS<br>2951 High STREET<br>CITY Oakland COUNTY Alameda ZIP 94619 |          |                         |
|               | CROSS STREET<br>Peniman St.                                          |          |                         |

|                       |                                                     |                                           |                                             |                         |
|-----------------------|-----------------------------------------------------|-------------------------------------------|---------------------------------------------|-------------------------|
| IMPLEMENTING AGENCIES | LOCAL AGENCY<br>Alameda County Health Care Services | AGENCY NAME<br>Program Hazardous Material | CONTACT PERSON<br>MR. Ariu Levi / MR. Larry | PHONE<br>(415) 271-4320 |
|                       | REGIONAL BOARD<br>San Francisco Bay                 |                                           | MR. Richard Hiett                           | PHONE<br>(415) 464-8359 |

|                     |                                     |                                                             |
|---------------------|-------------------------------------|-------------------------------------------------------------|
| SUBSTANCES INVOLVED | (1) NAME<br>Low/Medium Hydrocarbons | QUANTITY LOST (GALLONS)<br><input type="checkbox"/> UNKNOWN |
|                     | (2) NAME<br>oil and Grease          | <input type="checkbox"/> UNKNOWN                            |

|                     |                                                                                                                             |                                                                                                                                                                                                                                                                                                                                       |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DISCOVERY/ABATEMENT | DATE DISCOVERED<br>01/4/2005                                                                                                | HOW DISCOVERED<br><input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS<br><input type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input checked="" type="checkbox"/> OTHER Soil samples for property transfer                     |
|                     | DATE DISCHARGE BEGAN<br>M M D D Y Y<br><input checked="" type="checkbox"/> UNKNOWN                                          | METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)<br><input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK<br><input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE<br><input type="checkbox"/> OTHER |
|                     | HAS DISCHARGE BEEN STOPPED?<br><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE M M D D Y Y |                                                                                                                                                                                                                                                                                                                                       |

|              |                                                                                                                                                                           |                                                                                                                                                                                                                                                   |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SOURCE/CAUSE | SOURCE OF DISCHARGE<br><input type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input checked="" type="checkbox"/> OTHER | CAUSE(S)<br><input checked="" type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> SPILL<br><input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|           |                                                                                                                                                                                                                                              |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CASE TYPE | CHECK ONE ONLY<br><input type="checkbox"/> UNDETERMINED <input checked="" type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED) |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CURRENT STATUS | CHECK ONE ONLY<br><input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION<br><input type="checkbox"/> LEAK BEING CONFIRMED <input checked="" type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS<br><input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| REMEDIAL ACTION | CHECK APPROPRIATE ACTION(S)<br>(SEE BACK FOR DETAILS)<br><input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT)<br><input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS)<br><input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS)<br><input type="checkbox"/> OTHER (OT) |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

COMMENTS: See attached Report. Was told by Mr. Levi to determine if ground water has been impacted, and to install wells. Additional work when the tanks were removed.

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

**STATE WATER RESOURCES CONTROL BOARD**

**DIVISION OF CLEAN WATER PROGRAMS**

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CA 94244-2120



FAX (916) 227-4349

FAX (916) 227-4530

FAX (916) 227-4595

TRANSMITTAL OF FAX MATERIAL

DATE: 10/17/94

TO: Juliet Shim

FAX # \_\_\_\_\_

FROM: **DIVISION OF CLEAN WATER PROGRAMS**  
**FAX # (916) 227-4349**  
**CLEANUP FUND FAX (916) 227-4530**  
**Planning Facilities FAX (916) 227-4595**

Francine Aquino

*(If you did not receive all your FAX,  
please call (916) 227- 4427)*

NO. OF PAGES 4 (including this sheet)

For your information

Per your request

For your review and comments

REMARKS: Pls sign under  
Cheryl's name + fax  
back only that page.



## DETAILED REVIEW CHECKLIST

CLAIM NUMBER: 008355SITE ADDRESS: 2951 HIGH STREET, OAKLANDDIRECTIVE

- 9-27-88 CLMNT COMPLETED UST CLOSURE/MODIFICATION PLAN FOR CNTY
- 3-23-90 SUBSURFACE INVESTIGATION CONSISTING OF TWO EXPLORATORY BORINGS WAS CONDUCTED IN RESPONSE TO SIGNS OF OIL SPILLAGE ON THE PROPERTY
- 5-12-90 URF ON FILE WITH CNTY-LISTS CONTAMINATION DISCOVERED DURING SOIL SAMPLES FOR PROPERTY TRANSFER-LISTS CAUSE OF CONTAMINATION AS SPILL AND OVERFILL--TANKS ARE STILL IN THE GROUND
- 4-12-90 CNTY RECVD A CONTAMINATION INVESTIGATION REPORT
- 9-18-90 CNTY WROTE TO MR. MASHHOON CONFIRMING CONTAMINATION AND REQUESTED FURTHER DEFINITION OF EXTENT OF CONTAMINATION
- 10-30-92 CNTY REQUESTED A WORKPLAN ADDRESSING DETERMINATION OF THE EXTENT OF THE CONTAMINATION DUE 12-15-93
- 12-15-92 CNTY ISSUED A NOTICE OF VIOLATION TO MOHAMMAD MASHHOON FOR FAILURE TO SUBMIT A WORKPLAN ADDRESSING THE DELINEATION OF THE SOIL CONTAMINATION DURING THE SAMPLING IN MARCH, 1990 WHICH WAS REQUESTED ON 10-30-92
- 8-12-93 CNTY NOTIFIED CLMNT TO REMOVE AN INACTIVE WASTE OIL TANK THAT HAS BEEN INACTIVE SINCE 1990, ALSO REMINDED CLMNT THAT CLMNT IS STILL REQUIRED TO CONDUCT FURTHER SOIL AND GROUNDWATER INVESTIGATIONS ASSOCIATED WITH THE MARCH 1990 RELEASE
- 9-13-93 WASTE OIL TANK REMOVED
- 10-8-93 CNTY RECVD SOIL SAMPLING BELOW REMOVED UST DATED 9-30-93
- 10-14-93 CNTY ON SITE FOR OVER-EXCAVATION
- 12-93 CNTY RECVD REMEDIATION EXCAVATION ACTIVITIES AND SOIL SAMPLING REPORT DATED 12-15-93
- 12-29-93 CNTY CONFIRMED CONTAMINATION FROM EXCAVATION OF WASTE OIL AND ADDRESSED THE ALREADY CONFIRMED 1990 RELEASE. DIRECTED CLMNT TO CONDUCT A PRELIMINARY SITE ASSESSMENT TO DETERMINE EXTENT OF CONTAMINATION IN SOIL AND GROUNDWATER

P.2  
#008355

- 1-3-94 CNTY NOTIFIED BY CLMNT'S ATTORNEY THAT CLMNT DID NOT HAVE THE FUNDS TO COMPLY WITH 12-29-93 REQUEST. ATTORNEY SUGGESTED THAT CNTY CONTACT PREVIOUS OWNER (ARCO) WHO INSTALLED THE TANKS
- 1-13-94 CNTY NAMED CLIFFORD LEE AS AN RP AND REQUESTED A PRELIMINARY SITE ASSESSMENT IN ASSOCIATION WITH THE WASTE OIL TANK WHICH WAS REMOVED IN 1993
- 3-11-94 CNTY DIRECTED CLIFFORD LEE TO BEGIN INVESTIGATION AS OUTLINED IN THE ABOVE 1-13-94 LTR. NOTIFIED MR. LEE THAT THE SITE HAD BEEN CONDITIONALLY ACCEPTED IN THE CLEANUP FUND
- 6-13-94 CNTY ON SITE FOR UST MODIFICATIONS
- 6-16-94 CNTY WROTE TO MR. MASHHOON REGARDING A RECENT EXCAVATION AT THE SITE AS PART OF INSTALLATION OR UPGRADE WORK. DIRECTED CLMNT TO COLLECT SOIL SAMPLES AND SUBMIT LAB RESULTS BY JULY 30, 1994
- 8-1-94 CNTY RECVD PROPOSED WORKPLAN FOR PRELIMINARY SITE ASSESSMENT DATED 5-12-94
- 8-10-94 CNTY RESPONDED TO WORKPLAN DATED 5-12-94 AND REQUESTED AND ADDENDUM TO THE WORKPLAN PRIOR TO CNTY APPROVAL
- 8-30-94 CNTY RECVD A COPY OF A MARCH 9, 1990 PHASE II PRELIMINARY SITE CHARACTERIZATION PERFORMED BETWEEN 8-8-89 AND 3-1-90 AT THE REQUEST OF BLUE CHIP BUSINESS BROKERS, INC BECAUSE THE PROPERTY WAS PENDING SALE. TWO 4K GAL TANKS, AND TWO 6K GAL TANKS WERE TESTED. TANK TESTS FROM 1988 FOR TWO 6K TANKS TESTED TIGHT, TWO 4K GAL TANKS WERE NOT CERTIFIED TIGHT BUT RATES MEASURED WITHIN LEGAL LIMITS. CONSULTANTS WERE INFORMED THAT THE PIPING AND DISPENSERS ON SITE WERE REPLACED WITHIN THE LAST YEAR OR TWO, THEREFORE THE CONSULTANTS ASSUMED THAT ANY CONTAMINATION THAT WAS FOUND AT THE UPGRADE WOULD HAVE BEEN ADDRESSED AT THAT TIME
- 9-12-94 CNTY RECVD PROPOSED WORKPLAN FOR PRELIMINARY SITE ASSESSMENT DATED 9-2-94
- 9-14-94 CNTY APPROVED ADDENDUM TO 5-12-94 WORKPLAN AND DIRECTED FIELD ACTIVITIES TO BEGIN BY 9-28-94

1994.09-14 15:28  
 510 337 9335  
 ALAMEDA CO EHS HAZ-OPS

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ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
 DAVID J. KEARS, Agency Director



|                                          |                    |                |
|------------------------------------------|--------------------|----------------|
| Post-It™ brand fax transmittal memo 7671 |                    | # of pages ▶ 1 |
| To Frank Hamedi                          | From Juliet Shin   |                |
| Co. Soil Tech                            | Co. Alameda County |                |
| Dept.                                    | Phone # 567-6763   |                |
| Fax # (408) 988-3343                     | Fax #              |                |

September 14, 1994

Mr. Mohammad Mashoon  
 2951 High St.  
 Oakland, CA 94619

DEPT. OF ENVIRONMENTAL HEALTH  
 1131 HARBOR BAY PKWY 2ND FLOOR  
 ALAMEDA CA 94502-6577

STID 1038

Re: Addendum to work plan for investigations at 2951 High St.,  
 Oakland, California

Dear Mr. Mashoon,

This office has reviewed Soil Tech Engineering's (Soil Tech) addendum to the May 12, 1994 work plan. This work plan is acceptable to this office. Per the work plan, field activities will begin at the site within two weeks of the County's approval of the work plan, or by September 28, 1994. Any changes to this schedule need to be communicated to this office.

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

Sincerely,

*Juliet Shin*  
 Juliet Shin  
 Hazardous Materials Specialist

cc: Mr. Frank Hamedi  
 Soil Tech Engineering, Inc.  
 298 Brokaw Rd.  
 Santa Clara, CA 95050

Edgar Howell



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ALAMEDA COUNTY HEALTH CARE SERVICES

September 14, 1994

Mr. Mohammad Mashoon  
2951 High St.  
Oakland, CA 94619

ALAMEDA COUNTY 430-453  
HEALTH CARE SERVICES  
DEPT. OF ENVIRONMENTAL HEALTH  
1131 HARBOR BAY PKWY 2ND FLOOR  
ALAMEDA CA 94502-6577

STID 1038

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Oakland, California

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin'.

Juliet Shin  
Hazardous Materials Specialist

cc: Mr. Frank Hamedi  
Soil Tech Engineering, Inc.  
298 Brokaw Rd.  
Santa Clara, CA 95050

Edgar Howell

ARCO Products Company  
2000 Alameda de las Pulgas  
Mailing Address: Box 5811  
San Mateo, California 94402  
Telephone 415 571 2400

ALCO  
HAZMAT



94 SEP 13 PM 2:14  
September 9, 1994

Ms. Susan Hugo  
Alameda County Heath Care Services  
80 Swan Way, Room 200  
Oakland, CA 94621

Re: Transfer of ARCO Projects.

Dear Ms. Hugo:

The purpose of this letter is to inform you of changes that ARCO Products Company (ARCO) has recently made in regards to environmental consulting firms working on environmental projects at existing and former ARCO retail facilities. In an effort to promote consistency, be more proactive, streamline communications and reduce costs, ARCO has significantly reduced the number of environmental consultants performing assessment and remedial activities on these environmental projects. The consolidation, which took effect on 9/1/94, involves a reduction of approximately 75% to 80% of the consulting firms that ARCO previously used. ARCO firmly believes that this consolidation effort will dramatically streamline ARCO's communication process, both with your office and staff as well as with ARCO's remaining consultants. The consulting firms which ARCO will now use at retail facility environmental projects throughout the west (WA, OR, CA, NV and AZ) include: Brown & Caldwell, Delta Environmental, Emcon Associates, Pacific Environmental Group, and Secor.

Attached to this letter is a list of sites in your jurisdiction that have recently been transferred to one of the five consulting firms listed above. In most cases, these five consulting firms were already working on ARCO projects in your jurisdiction. Also included in the list is the name of the ARCO engineer responsible for the site. please don't hesitate to call the respective ARCO engineer or the consultant's regional contact if you have any questions regarding any of the projects.

The transfer of the projects from the former consultant to one of the five firms listed above should be completed by October 1, 1994. Shortly thereafter I will be contacting you to schedule a meeting to introduce you to the primary contacts at the consulting companies and to review the projects with your staff. Please contact me at (415) 571-2468 if you have any questions concerning this letter.

Sincerely,

Kyle Christie

## ALAMEDA COUNTY HEALTH DEPT.

| Facility Number | City          | Address                  | New Consulting Firm | ARCO Engineer | ARCO Engineer phone number |
|-----------------|---------------|--------------------------|---------------------|---------------|----------------------------|
| 276             | Oakland       | 10600 MacArthur Blvd.    | Emcon               | Mike Whelan   | 415-571-2449               |
| 347             | Oakland       | <u>2751 High Street</u>  | Brown & Caldwell    | Brad Jones    | 213-486-0681               |
| 374             | Oakland       | 6407 Telegraph Avenue    | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 601             | San Leandro   | 712 Lewelling Blvd.      | Emcon               | Mike Whelan   | 415-571-2449               |
| 771             | Livermore     | 899 Rincon Avenue        | Emcon               | Mike Whelan   | 415-571-2449               |
| 2035            | Albany        | 1001 San Pablo Avenue    | Emcon               | Mike Whelan   | 415-571-2449               |
| 2107            | Oakland       | 3310 Park Blvd.          | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 2111            | San Leandro   | 1156 Davis Street        | Emcon               | Mike Whelan   | 415-571-2449               |
| 2112            | Alameda       | 1260 Park Street         | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 2152            | Castro Valley | 22141 Center Street      | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 2162            | San Leandro   | 15135 Hesperian Blvd.    | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 2169            | Oakland       | 889 West Grand Avenue    | Emcon               | Mike Whelan   | 415-571-2449               |
| 2185            | Oakland       | 9800 East 14th Street    | Emcon               | Mike Whelan   | 415-571-2449               |
| 4494            | Oakland       | 566 Hagenberger Road     | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 4931            | Oakland       | 731 West MacArthur Blvd. | Pacific Env. Group  | Mike Whelan   | 415-571-2449               |
| 6002            | Oakland       | 6235 Seminary Avenue     | Emcon               | Mike Whelan   | 415-571-2449               |
| 6041            | Dublin        | 7249 Village Parkway     | Emcon               | Mike Whelan   | 415-571-2449               |
| 6113            | Livermore     | 785 East Stanley Blvd.   | Emcon               | Mike Whelan   | 415-571-2449               |
| 6148            | Oakland       | 5131 Shattuck Avenue.    | Emcon               | Mike Whelan   | 415-571-2449               |
| 9908            | Oakland       | 8255 San Leandro Blvd    | Brown & Caldwell    | Brad Jones    | 213-486-0681               |

Your Emcon contact is Mr. Jay Johnson.

Your Pacific Environmental Group contact is Mr. Greg Barclay

Your Brown & Caldwell contact is Mr. Ron Zurlinden

## CONSULTANTS CONTACTS

| Consultant Name  | ARCO Program Manager (APM)                                                                                      | Technical Coordinator (TC)                                                                                       | Area | Administrative Coordinator (AC)                                                                                  |
|------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|------|------------------------------------------------------------------------------------------------------------------|
| Brown & Caldwell | Mikk Anderson<br>150 So Arroyo Pkwy<br>Pasadena, CA 91109<br>(818) 577-1020<br>Fax (818) 795-6016               | Ron Zurinden<br>9616 micro Ave<br>Sacramento, CA 95813-3449<br>(916) 444-0123 --- Fax (916) 856-5277             | NW   | Mat Quinn<br>150 So Arroyo Pkwy<br>Pasadena, CA 91109<br>(818) 577-1020<br>Fax (818) 795-6016                    |
|                  |                                                                                                                 | Ron Halsey<br>16735 Von Karman, Suite 200<br>Irvine, CA 92714-4918<br>(714) 660-1070 --- Fax (714) 474-0940      | SW   |                                                                                                                  |
|                  |                                                                                                                 | Mike Higman<br>9040 Frairs Rd, Suite 220<br>San Diego, CA 92108<br>(619) 528-9090 --- Fax (619) 528-9199         | SW   |                                                                                                                  |
| Delta            | Jon Pesicka<br>27141 Aliso Creek Rd, Suite 270<br>Aliso Viejo, CA 92656<br>(714) 362-3077<br>Fax (714) 362-0290 | Todd Galati<br>3330 Data Dr, Suite 100<br>Rancho Cordova, CA 95670<br>(916) 638-2085 --- Fax (916) 638-8385      | NW   | Debbie Fluckiger<br>27141 Aliso Creek Rd, # 270<br>Aliso Viejo, CA 92656<br>(714) 362-3077<br>Fax (714) 362-0290 |
|                  |                                                                                                                 | Jon Pesicka<br>(714) 362-3077 --- Fax (714) 362-0290                                                             | SW   |                                                                                                                  |
| Emcon            | Jack Hardin<br>1921 Ringwood Ave<br>San Jose, CA 95131-1721<br>(408) 453-7300<br>Fax (408) 437-9526             | Rob Dixon<br>15055 SW Sequoia Pkwy, Suite 140<br>Portland, OR 97224-7712<br>(503) 624-7200<br>Fax (503) 620-7658 | NW   | Jeanette Memeo<br>1921 Ringwood Ave<br>San Jose, CA 95131-1721<br>(408) 453-7300<br>Fax (408) 437-9526           |
|                  |                                                                                                                 | Jay Johnson<br>1433 N Ave Market Blvd.<br>Sacramento, CA 95834-1943<br>(916) 928-3300<br>Fax (916) 928-3341      | NW   |                                                                                                                  |

9/6/94

## CONSULTANTS CONTACTS

| Consultant Name         | ARCO Program Manager (APM)                                                                                  | Technical Coordinator (TC)                                                                                             | Area | Administrative Coordinator (AC)                                                                                 |
|-------------------------|-------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|------|-----------------------------------------------------------------------------------------------------------------|
| Emcon                   | Jack Hardin                                                                                                 | Ric Morgan<br>120 Columbia, Suite 500<br>Aliso Viejo, CA 92656<br>(714) 362-1130<br>Fax (714) 362-1137                 | SW   | Jeanette Memeo                                                                                                  |
| Pacific Enviro<br>Group | Debra Moser<br>2025 Gate Way Place, Suite 440<br>San Jose, CA 95110<br>(408) 441-7500<br>Fax (408) 441-7539 | Greg Barclay<br>3050 Fite Circle, Suite 101<br>Sacramento, CA 95827<br>(916) 361-8091 --- Fax (916) 361-8094           | NW   | Norma Gutierrez<br>2025 Gate Way Place, Suite 440<br>San Jose, CA 95110<br>(408) 441-7500<br>Fax (408) 441-7539 |
|                         |                                                                                                             | Cleve Solomon<br>650 N Sierra Madre Villa, Suite 204<br>Pasadena, CA 91107<br>(818) 351-4814 -- Fax (818) 351-4822     | SW   |                                                                                                                 |
| Seacor                  | David Childs<br>1913 Volcanic Dr.<br>Benton, AR 72015-2161<br>(501) 776-3400<br>Fax (501) 776-3053          | Jim Ritchie<br>90 New Montgomery St, Suite 620<br>San Francisco, CA 94015-4503<br>(415) 882-1548 -- Fax (415) 882-4406 | NW   | Cindy Malloy<br>1734 - 34th St<br>Sacramento, CA 95816-7004<br>(916) 456-4333<br>Fax (916) 456-0110             |
|                         |                                                                                                             | Kyle Emerson<br>1180 Nevada St, Suite 200<br>Redlands, CA 92374<br>(909) 335-6116 --- Fax (909) 335-6120               | SW   |                                                                                                                 |
|                         |                                                                                                             | Bob Wilson<br>3485 Sacramento Dr, Suite A<br>San Luis Obspo, CA 93401-7160<br>(805) 546-0455 --- Fax (805) 546-0583    | SW   |                                                                                                                 |

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

August 10, 1994

Mr. Mohammad Mashoon  
2951 High St.  
Oakland, CA 94619

*Alameda County* CC 4580  
*Health Care Services Agency*  
*Dept. Of Environmental Health*  
*1131 Harbor Bay Pkwy 2nd Flr.*  
*Alameda, CA 94502-6577*

STID 1038

Re: Work plan for investigations at 2951 High Street, Oakland, California

Dear Mr. Mashoon,

This office has reviewed Soil Tech Engineering's (Soil Tech) work plan, dated May 12, 1994. Prior to the County's approval of this work plan, you are required to submit an **addendum** to the work plan addressing the following concerns:

- o It is the understanding of this office from the work plan and per Mr. Frank Hamedi's (Soil Tech) statements, that four borings are proposed for the site, with two of these borings being converted to monitoring wells. As stated in my conversation with Mr. Hamedi, on August 9, 1994, all monitoring wells must be located at least 20 feet apart from each other. If the wells are placed too close together, they may not reflect an accurate site-wide gradient.
- o Only two monitoring wells were proposed, and a minimum of three wells are required to calculate the site's ground water gradient. Per my conversation with Mr. Hamedi, it is your intention to utilize the existing well as the required third well. However, before using this well for gradient determinations or sampling, you are required to submit a detailed description for the construction of this well to assure that it can, in fact, be used for these purposes. If well construction information is not available for the existing well, you will be required to propose the installation of a third well.
- o The work plan addendum shall address your plans for the currently stockpiled soil at the site. The stockpiled soil shall be analyzed for all waste oil constituents of concern: Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), benzene, toluene, ethylbenzene, and xylenes (BTEX), metals (Cd, Cr, Pb, Ni, Zi), Total Oil and Grease (TOG), and chlorinated hydrocarbons (8010 or 8240). A timetable outlining the dates of proposed sampling and

Mr. Mohammad Mashoon  
Re: 2951 High St.  
August 10, 1994  
Page 2 of 2

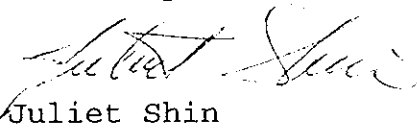
disposal of the stockpiled soil shall be submitted. Per my conversation with Mr. Hamedi on August 9, 1994, the stockpiled soil is currently fully covered with visqueen. This soil must remain covered until it is hauled off site.

- o The work plan proposes that the soil samples will only be analyzed for oil initially using Method 8015, and only if levels of oil are identified, will you analyze for the other constituents of concern. This is not acceptable. All soil and ground water samples collected at the site, including the ones from the stockpiled soil, shall be analyzed initially for the whole array of waste oil constituents (TPHg, TPHd, BTEX, TOG, metals, and chlorinated hydrocarbons), per the Regional Water Quality Control Board's guidelines.
- o Soil samples shall be collected from 5-foot intervals, changes in lithology, and at the soil/water interface. A minimum of one soil sample from each of the proposed borings shall be analyzed for the constituents of concern. Field screening, both visual and with the use of monitoring equipment, shall be conducted during the sampling to determine which samples will be analyzed at the certified laboratory.

The work plan addendum, addressing the above concerns, shall be submitted to this office **within 20 days** of the date of this letter. Any requests for the extension of the due date must be submitted in writing.

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Mr. Frank Hamedi  
Soil Tech Engineering, Inc.  
298 Brokaw Rd.  
Santa Clara, CA 95050

✓ Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

August 10, 1994

Mr. Mohammad Mashoon  
2951 High St.  
Oakland, CA 94619

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Mr. Mohammad Mashoon  
Re: 2951 High St.  
August 10, 1994  
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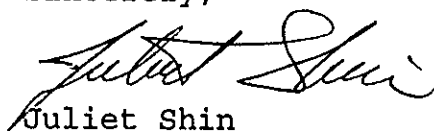
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Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Mr. Frank Hamedi  
Soil Tech Engineering, Inc.  
298 Brokaw Rd.  
Santa Clara, CA 95050

Edgar Howell-File(JS)

To: Mr. Mashoon

Incorporated in W.P.  
(Meeting 7/20/94) Subject: Mr. Mashoon

- Wall construction details for existing well?
  - Wall Sounding?
- Total of 3 acceptable wells required
- One well w/in 10' in downgradient direct
- Delineate soil contamination on northeast and northwest sides of pit.
- Possibly not three borings required on northeast side.

To determine  
gradient on  
a monthly or qtrly  
basis.

\* Reminder: Sample excavated/stockpiled soil on site and dispose of properly if necessary.

---

Mr. Mashoon stated that he retained Mr. Chadbourne, Chadbourne Co. to sample currently stockpiled soil. According to Mr. Mashoon, ~~this work~~ the sampling has already been done. Mr. Chadbourne's phone # is (415) 931-7208 Fax: 415-344-1428

7/20/94 → I left Mr. Chadbourne message requesting sampling results.

Mr. Mashoon stated that the revised w.p. would be submitted w/in 2 weeks.

---

ALEXANDER GOREN



S.F.-Oakland  
Truck Stop

8255 SAN LEANDRO STREET  
OAKLAND, CALIFORNIA 94621

(510) 569-1624  
Fax (510) 569-3673

**CLAPP, MORONEY, BELLAGAMBA,  
DAVIS AND VUCINICH**

A PROFESSIONAL CORPORATION

4400 BOHANNON DRIVE, SUITE 100  
MENLO PARK, CA 94025

TELEPHONE (415) 327-1300  
TELEFAX (415) 327-3707

June 30, 1994

PLEASANTON OFFICE  
6140 STONERIDGE MALL ROAD  
SUITE 545  
POST OFFICE BOX 8003-8803  
PLEASANTON, CALIFORNIA 94588  
TELEPHONE (510) 734-0990  
TELEFAX (510) 734-0888

REPLY TO: MENLO PARK OFFICE

DUANE E. CLAPP, JR.  
ROBERT A. BELLAGAMBA  
JEFFREY M. VUCINICH  
GREGORY J. SEBASTINELLI  
MARK B. O'CONNOR  
P. CHRISTIAN SCHELEY  
GREGORY C. SIMONIAN  
JANE A. CORNING  
TIMOTHY L. YOSHIDA  
VIRGINIA L. VASQUEZ  
CRAIG D. GUENTHER  
TRACY C. HERSTADT  
HARRY G. LEWIS  
JOHN F. DOYLE  
LYNNE LAMPROG ARTHUR  
MARC H. BAER  
MERRILEE C. HAQUE  
ROBERT P. SHATZKO  
MARK L. DAWSON  
CLAY A. COELHO  
SHERRI L. CRAWFORD

CARL J. MORONEY  
TIMOTHY C. DAVIS  
CHRISTOPHER W. WOOD  
CHRISTOPHER J. BEEMAN  
FRANK J. PERRETTA  
DONALD L. SULLIVAN  
MARK T. GUERRA  
LEIGH A. GOLDSTEIN  
TERILYNN PEREZ  
DEBORAH H. LEIBMAN  
ANDREW R. POLLACK  
L. THEODORE SCHELEY, III  
BETH E. WATKINS  
PETER J. VAN ZAJDOT  
BRUCE N. FUJUKAWA  
DAVID T. MOUTOUX  
KATHLEEN S. FARLEY  
TERESA A. RICE  
BRIAN K. HALL  
JAMES E. HART III

Ms. Juliet Shin  
Department of Environmental Health  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Room 200  
Oakland, California 94621

Re: Zima Center, Inc., v. Atlantic Richfield Company, et al.  
Alameda County Superior Court No. 739954-7  
Our File No. : 0159-8393  
Your Reference: Excavated soil from 2951 High Street, Oakland

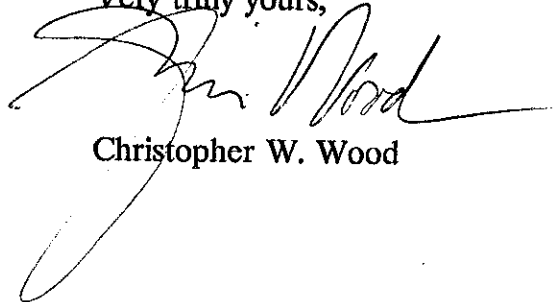
Dear Ms. Shin:

I represent Clifford Lee with respect to the contamination matters at 2951 High Street in Oakland. I recently received your June 16, 1994, letter addressed to Mr. Mohammad Mashhoon and Clifford Lee. I would appreciate your putting me on your service list for any and all communications you direct to Mr. Lee so that I may respond on his behalf in a timely manner.

If you have any comments or questions about this, please let me know.

Thank you for your consideration in this matter.

Very truly yours,



Christopher W. Wood

CWW/vlf

cc: Clifford Lee  
Gerard Lam, Esq.

VLF\159\8393\SHIN.LTR

94 JUL -7 PM 5:08  
ALCOAT  
HAZMAT

June 16, 1994

Mr. Mohammad Mashoon  
2951 High St.  
Oakland, CA 94619

STID 1038

Re: Excavated soil from 2951 High St., Oakland, California

Dear Mr. Mashoon,

This office was informed this last week by one of our Hazardous Materials Specialists, Brian Oliva, that additional soil has recently been excavated out at the site as part of installation or upgrade work. According to Mr. Oliva, staining and petroleum odors were noted in the newly excavated soil and pits. Additionally, based on the sampling results of the waste oil tank removal at the site, it appears that the observed releases in these new pits may be due to releases from the former waste oil tank. Therefore, as in the case of the formerly excavated soil from the waste oil tank pit, you are required to collect soil samples from the newly excavated soil and dispose of it off site if any unacceptable levels of contaminant constituents are identified. These soil samples shall be analyzed for all waste oil constituents listed in Table 2, Recommendations for Preliminary Evaluation and Investigation of Underground Storage Tanks. Lab analysis results of the stockpiled soil samples and documentation for the fate of this soil shall be submitted **within 45 days of the date of this letter.**

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

Sincerely,

Juliet Shin  
Hazardous Materials Specialist

cc: Clifford Lee  
645 16th Ave.  
San Francisco, CA 94118

Mr. Mohammad Mashoon  
Re: 2951 High St.  
June 16, 1994  
Page 2 of 2

Blessy Torres  
State Water Resources Control Board  
Division of Clean Water Programs  
P.O. Box 944212  
Sacramento, CA 94244-2120

Donna Turlotte  
State Water Resources Control Board  
Division of Clean Water Programs  
P.O. Box 944212  
Sacramento, CA 94244-2120

Gerald Lam  
1407 Webster St., Ste 216  
Oakland, CA 94612

John Warner  
21 Tamal Vista Blvd., Ste 196  
Corte Madera, CA 94925

Edgar Howell-File(JS)

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 # 1036 Site Name High St. (ZIMA) Today's Date 6/13/94

Site Address 2951 High St  
 City OAKLAND Zip 94612 Phone \_\_\_\_\_

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. MATLS

- \_\_\_ 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) \_\_\_\_\_
- \_\_\_ 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<br>Semi-annual gndwater<br>One time soils                               |
|                               | 3) Daily Vadose<br>One time soils<br>Annual tank test                                   |
|                               | 4) Monthly Gndwater<br>One time soils                                                   |
|                               | 5) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det<br>Vadose/gndwater mon. |
|                               | 6) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det                         |
|                               | 7) Weekly Tank Gauge<br>Annual tank testing                                             |
|                               | 8) Annual Tank Testing<br>Daily Inventory                                               |
|                               | 9) Other _____                                                                          |
| New Tanks                     | ___ 7. Precls Tank Test 2643                                                            |
|                               | Date: _____                                                                             |
|                               | ___ 8. Inventory Rec. 2644                                                              |
|                               | ___ 9. Sol Testing 2646                                                                 |
|                               | ___ 10. Ground Water. 2647                                                              |
| ___ 11. Monitor Plan 2632     |                                                                                         |
| ___ 12. Access. Secure 2634   |                                                                                         |
| ___ 13. Plans Submit 2711     |                                                                                         |
| Date: _____                   |                                                                                         |
| ___ 14. As Built 2635         |                                                                                         |
| Date: _____                   |                                                                                         |

\_\_\_ 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)

Comments:

*On site for discretionary concerning modification of USTs*

*Note The soils in the area of the Northern most UST are heavily contaminated - 2 therefore took samples to be analyzed for TPH-G. (2) samples*

*The samples were taken for analysis to the EH LAB Results to be sent to Juliet Shu in JOP*

*Juliet - FYI*

*Bruce*

Rev 6/88

Contact: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Inspector: Bruce P. Allen  
 Signature: \_\_\_\_\_

II, III

white - lab  
 yellow - insp. file  
 pink - fac. file

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
 DIVISION OF HAZARDOUS MATERIALS  
 80 SWAN WAY, ROOM 200  
 OAKLAND, CA 94621  
 (415) 271-4320

Lab # 94-068

LABORATORY SERVICE REQUEST

SITENAME ZUMA GAS STATION  
 ADDRESS 2951 HIGH ST OAKLAND CA 94612  
 SAMPLE SUBMITTED TO: ELISH  
 DATE SUBMITTED 6/13/94  
 SEND INVOICE TO: \_\_\_\_\_

SEND ANALYTICAL REPORT TO ABOVE OR:  
ALCO/HAC MAT

ATTN: BRIAN/DIVA/Juliet SHIN  
Haz MAT LOP  
 RUSH = ABOUT 1 WEEK TURNAROUND  
 ROUTINE = ABOUT 2 WEEKS TURN-AROUND

| SAMPLE NO.          | DATE/TIME COLLECTED | TYPE OF MATERIAL (WATER, SOIL OR MATRIX) | VOLUME/WEIGHT | FIELD OBSERVATION | ANALYSIS REQUESTED |
|---------------------|---------------------|------------------------------------------|---------------|-------------------|--------------------|
| <u>6/13/94/2001</u> | <u>6/13/94/130</u>  | <u>SOIL</u>                              | <u>80g</u>    | <u>ODOR - GAS</u> | <u>TPH - G</u>     |
| <u>6/13/94/2002</u> | <u>6/13/94/130</u>  | <u>SOIL</u>                              | <u>80g</u>    | <u>   "   "</u>   | <u>   "   "</u>    |
|                     |                     |                                          |               |                   |                    |
|                     |                     |                                          |               |                   |                    |
|                     |                     |                                          |               |                   |                    |
|                     |                     |                                          |               |                   |                    |
|                     |                     |                                          |               |                   |                    |

Chain of Custody:

|                                    |                               |                                   |
|------------------------------------|-------------------------------|-----------------------------------|
| 1. <u>Brian Oliva</u><br>Signature | <u>Haz MAT Spec</u><br>Title  | <u>6/13/94</u><br>Inclusive Dates |
| 2. <u>Diana Song</u><br>Signature  | <u>Supv. Chemist</u><br>Title | <u>6/13/94</u><br>Inclusive Dates |
| 3. _____<br>Signature              | _____ Title                   | _____ Inclusive Dates             |

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

June 16, 1994

Mr. Mohammad Mashoon  
2951 High St.  
Oakland, CA 94619

STID 1038

Re: Excavated soil from 2951 High St., Oakland, California

Dear Mr. Mashoon,

This office was informed this last week by one of our Hazardous Materials Specialists, Brian Oliva, that additional soil has recently been excavated out at the site as part of installation or upgrade work. According to Mr. Oliva, staining and petroleum odors were noted in the newly excavated soil and pits. Additionally, based on the sampling results of the waste oil tank removal at the site, it appears that the observed releases in these new pits may be due to releases from the former waste oil tank. Therefore, as in the case of the formerly excavated soil from the waste oil tank pit, you are required to collect soil samples from the newly excavated soil and dispose of it off site if any unacceptable levels of contaminant constituents are identified. These soil samples shall be analyzed for all waste oil constituents listed in Table 2, Recommendations for Preliminary Evaluation and Investigation of Underground Storage Tanks. Lab analysis results of the stockpiled soil samples and documentation for the fate of this soil shall be submitted **within 45 days of the date of this letter**.

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

Sincerely,

Juliet Shin  
Hazardous Materials Specialist

cc: Clifford Lee  
645 16th Ave.  
San Francisco, CA 94118



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

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. MATLS

- \_\_\_ 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
- \_\_\_ 6. Method
  - 1) Monthly Test
  - 2) Daily Vadose
  - Semi-annual groundwater
  - One time soils
  - 3) Daily Vadose
  - One time soils
  - Annual tank test
  - 4) Monthly Groundwater
  - One time soils
  - 5) Daily Inventory
  - Annual tank testing
  - Cont pipe leak det
  - Vadose/groundwater man.
  - 6) Daily Inventory
  - Annual tank testing
  - Cont pipe leak det
  - 7) Weekly Tank Gauge
  - Annual tank test
  - 8) Annual Tank Testing
  - Daily Inventory
  - 9) Other \_\_\_\_\_
- \_\_\_ 7. Precs Tank Test 2643
  - Date: \_\_\_\_\_
- \_\_\_ 8. Inventory Rec. 2644
- \_\_\_ 9. Soil Testing 2646
- \_\_\_ 10. Ground Water. 2647
- Monitoring for Existing Tanks**
- \_\_\_ 11. Monitor Plan 2632
- \_\_\_ 12. Access. Secure 2634
- \_\_\_ 13. Plans Submit 2711
  - Date: \_\_\_\_\_
- \_\_\_ 14. As Built 2635
  - Date: \_\_\_\_\_
- New Tanks**

Site ID # \_\_\_\_\_ Site Name Zima (High ST Gas) Today's Date 6/12/94  
 Site Address 2951 High ST  
 City OAKLAND Zip 94609 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 installation

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

Comments:

On site for oversight of USF modification  
 17 hrs of work currently being under taken.  
 Soil removal appears contaminated with petroleum hydrocarbons. Several photos taken of area. There is water above tanks in excavation - shown observed.  
 Required action (X)  
 1) Characterize soil - do NOT backfill with soil that has been removed. Cover soil stock pile.  
 2) do not dispose of water in pits/excavation without performing laboratory analysis.  
 3) Do not undertake activities other than de gasing / initial - tank activities without the physical oversight by this office. Call for II, III form

Contact: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Inspector: B. Allen  
 Signature: \_\_\_\_\_

→ or handle Out for I

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 ZIMA Today's Date 6/7/94

II.A BUSINESS PLANS (Title 19)

- \_\_\_ 1. Immediate Reporting 2703
- \_\_\_ 2. Bus. Plan Sids. 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)

Site Address High ST

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

Will return in PM

2 north side tanks

II.B ACUTELY HAZ. MATLS

- \_\_\_ 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(i)
- \_\_\_ 18. Exemption Request? (Y/N) 25536(b)
- \_\_\_ 19. Trade Secret Requested? 25538

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

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 groundwater 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 testing
    - 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 Submt Date: 2711
  - \_\_\_ 14. As Built Date: 2635

Rev 6/88

Comments:

On site for further activities relating to UST Insul.

① The tanks have been emptied.

② LEL Reading 90 = 0

③ The tops have been removed with an electric hammer

④ According to owner, the OFD was on site in late PM on 6/6/94 and approved of the procedures

Required actions

① Cover all soil spoils and dispose of as hazardous.

Note ② Do Not dispose of ANY WATER removed from the pits - Down the Storm System - must be characterized (Lab Analysis) or otherwise disposed of as hazardous.

II, III

Contact: [Signature]

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Inspector: Brian P. [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 Zim A Today's Date 6/6/94

II.A BUSINESS PLANS (Title 19)

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- \_\_\_ 7. Training 25504(c)
- \_\_\_ 8. Deficiency 25505(a)
- \_\_\_ 9. Modification 25505(b)

Site Address 2957 High ST  
 City Oakland Zip 94619 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 MODIFICATION UST

II.B ACUTELY HAZ. MATLS

- \_\_\_ 10. Registration Form Filed 25533(a)
- \_\_\_ 11. Form Complete 25533(b)
- \_\_\_ 12. RMPP Contents 25534(c)
- \_\_\_ 13. Implement Sch. Req'd? (Y/N)
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\* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

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<br>Semi-annual groundwater<br>One time soils                            |
|                                          | 3) Daily Vadose<br>One time soils<br>Annual tank test                                   |
|                                          | 4) Monthly Gndwater<br>One time soils                                                   |
|                                          | 5) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det<br>Vadose/gndwater mon. |
|                                          | 6) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det                         |
|                                          | 7) Weekly Tank Gauge<br>Annual tank testing                                             |
|                                          | 8) Annual Tank Testing<br>Daily Inventory                                               |
|                                          | 9) Other _____                                                                          |
| New Tanks                                | ___ 7. Precls Tank Test 2643<br>Date: _____                                             |
|                                          | ___ 8. Inventory Rec. 2644                                                              |
|                                          | ___ 9. Soil Testing 2646                                                                |
|                                          | ___ 10. Ground Water. 2647                                                              |
| ___ 11. Monitor Plan 2632                |                                                                                         |
| ___ 12. Access. Secure 2634              |                                                                                         |
| ___ 13. Plans Submil 2711<br>Date: _____ |                                                                                         |
| ___ 14. As Built 2635<br>Date: _____     |                                                                                         |

Comments:

On site for oversight of modification of 4 single walled, u/sd been lined (5) at site a contractor - who is in the process of de-watering excavations. This was a top site - and this office previously observed a sheen on the water in the pit. I instructed Mr Chadebourg (the Contractor) not to dispose of the removed water in the storm drain system (which he was doing). The water was placed in the 55 gallon drums stored on site (230) returned to site - the walls around the excavation have been shored with plywood - I informed the contractor of the inherent dangers ~~of~~ underground storage tanks - and that the fire department should be on the site for such work to be done.

Rev 8/88

Contact: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Inspector: Bruce P. Olm  
 Signature: \_\_\_\_\_

II, III

**HNA**

**William D. Clark, P.E.  
P. O. Box 9329  
Truckee, CA 96162  
916-582-8215**

**TF 34338  
TANK FIELD REPORT FORM**

**DATE:** 6-7-04

**TO:** D. I. Chadbourne, Inc.  
204 East 2nd Avenue, Suite 622  
San Mateo, California 94401

**LOCATION:** 2951 High Street, Oakland, Ca.

**I. TANK INFORMATION**

| I. D. & Type         | Sizes<br>(000's gallons) |
|----------------------|--------------------------|
| #2 Nearest High Str. | 4.0                      |
| #3                   | 4.0                      |

**II. INSPECTIONS**

**A. Visual Inspection General Comments:**

Tank #2 had no holes, visual and ultrasonic inspection excellent.  
Water leak from turbine.

Tank #3 had one (1) pin hole visual and ultrasonic inspection excellent.  
Water leak from vapor recovery outlet.

B. Underground Tank Regulation Comments:

|                                                                                                                                                                                              | YES         | NO         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|------------|
| 1. Were all the interior surfaces of the tank(s) abrasively blasted completely free of scale, rust and foreign matter?                                                                       | X<br>_____  | _____      |
| 2. Were the entire tank(s) interior tested using a thickness gauge on a one-foot grid pattern according to California Underground Storage Tank Regulations Article 6, Section 2661 (c) (2) ? | X<br>_____  | _____      |
| 3. Were all the metal thickness readings greater than 75% of original wall thickness?                                                                                                        | X<br>_____  | _____      |
| 4. Was there an open seam or a split longer than three inches per tank?                                                                                                                      | _____       | X<br>_____ |
| 5. Was there a perforation larger than one and one-half inches in diameter per tank?                                                                                                         | _____       | X<br>_____ |
| 6. Was there a perforation below the gauging opening larger than two and one-half inches in diameter per tank?                                                                               | NA<br>_____ | _____      |
| 7. Were there five or more perforations in any one square foot area per tank?                                                                                                                | _____       | X<br>_____ |
| 8. Were there any multiple perforations of which any single perforation was larger than one-half inch in diameter per tank?                                                                  | _____       | X<br>_____ |

C. Perforation(s) Details:

| TANK INFORMATION<br>I.D. & Type | PERFORATION INFORMATION |       |                              |
|---------------------------------|-------------------------|-------|------------------------------|
|                                 | Number                  | Size  | Sq. Foot Area                |
|                                 |                         |       | 1 Sq. Foot      500 Sq. Foot |
| #2                              | NA                      |       |                              |
| #3                              | 1                       | 1/64" |                              |

III. ULTRASONIC TEST RESULTS

Thickness in Thousandths of an Inch

| Tank | Low Value | Median Value | High Value |
|------|-----------|--------------|------------|
| #2   | 0.180     | 0.190        | 0.195      |
| #3   | 0.181     | 0.191        | 0.197      |

IV. FINDINGS:

Based on visual inspection and ultrasonic testing the above subject tanks have undergone no significant deterioration, are structurally sound and are suitable for lining.

Sincerely,



William D. Clark, P.E.  
CE37998

Joseph M. Bommarito  
Law Department

The Travelers

The Travelers Companies  
Bonderson Towers - Tower 1  
19500 MacArthur Boulevard  
Suite 1210  
Irvine, CA 92715-2421  
(714) 724-5493  
Fax: (714) 724-5413

FAX COVER SHEET

TO: Juliet Blake

FROM: Joe Bommarito

RE: File Review Request  
(CASE NAME)

FILE NUMBER: \_\_\_\_\_

NUMBER OF PAGES: 2

TIME: 3:30

DATE: 5-23-94

SHOULD YOU HAVE ANY QUESTIONS REGARDING THIS FAX PLEASE CALL  
(714)724-5493

6/20/94

900

# TheTravelers

The Travelers Companies  
19800 MacArthur Blvd.  
Newport Gateway Suite-1210  
Irvine, CA 92715

Special Liability Coverage Unit  
Law Department

May 23, 1994

Juliet Blake  
Alameda Dept. of Environmental Health  
80 Swan Way, Room 200  
Oakland, CA 94621

RE: FILE REVIEW REQUEST  
SITE: 2951 HIGH STREET  
OAKLAND, CALIFORNIA 615

1038  
JMS

94 MAY 24 AM 8:22

ALCO  
HAZMAT

Dear Ms. Blake,

I am conducting an insurance liability investigation regarding the above referenced site. As part of the investigation I wish to review the Alameda County DEH's file on the above referenced site.

If the week of May 31st to June 3rd is available, I would like to make the necessary arrangements to review the file. Please contact me at (714)724-5493 to schedule an appointment for that time frame or for a mutually convenient time.

Thank you for your cooperation and assistance in this matter.

Sincerely,



Joe Bommarito  
Travelers Insurance  
SLCU-Law Dept.  
19800 Mac Arthur Blvd. #1210  
Irvine, CA 92715



**High Street Neighborhood Alliance**  
P.O. Box 19143, Oakland CA 94619-9143  
**Neighbors Building Community**

ALCO  
HAZMAT

April 19, 1994

94 APR 21 AM 10:42

Ed Howell, Chief  
Alameda County - Health Care Services Agency  
Department of Environmental Health  
Division of Hazardous Materials  
80 Swan Way, Room 200  
Oakland, CA 94621

RE: REQUEST FOR ASSURANCE OF COMPLIANCE AT 2 OAKLAND SITES

Dear Mr. Howell:

As we discussed three weeks ago, I am concerned about 2 sites of contaminated soil in my neighborhood. I represent a volunteer neighborhood group, the High Street Neighborhood Alliance, and we can not afford to pay your record search fees, however we are very concerned about the possible lack of compliance by the below property owners.

- JMS*
1. Zima Center Inc. (formerly called High St. ARCO)  
2951 High Street  
Oakland, CA 94619 (site ID# 1038, ins. JM)

The pile of contaminated soil has not been removed despite a letter from your office 5 weeks ago. I understand from your staff that this site owner has been recalcitrant in honoring your requests for compliance.

- BC*
2. J & J Auto Repair (formerly German Engine Repair)  
2350 High Street  
Oakland, CA 94601 (site ID# 1288, ins. BC)

We want to be assured that the contaminated soil from the tank area was disposed of properly as per your written instructions and supervision. We have reason to believe that this soil may have been deposited the nearby Courtland Creek behind an apartment building (4343 Brookdale Ave.) owned by the same owner who owns site 1288. For your information, I have asked the Department of Fish and Game to look into this possible direct violation of the creek bed. I understand that the County measures the volume of the contaminated soil and does enforce how it is disposed of, however we are not sure if this took place because of what neighbors told us about what allegedly they saw happen about a year ago.

Since your fees are prohibitive, we are asking for your assistance to verify compliance in both of these cases. We want to know what are the pending actions and due dates for compliance including status of investigations, work plans, and any other requirements. We realize that your office is very short staffed, however would appreciate receiving a status report of pending actions for these sites at your earliest convenience.

Sincerely,

*Suzanne Outten*  
Suzanne Outten

HSNA/Public Safety Task Force Leader

cc: Natalya Nicoloff Friends of Courtland Creek

*Dave Pelto, HSNA pres. (4407 Penniman, Oak. 94619)*

Barr: Site has been checked soil disposal checked + confirmed to Road Rd with receipts, Creek area checked no indication of illegal disposal.

Indict:

High St. Neighborhood Alliance  
P.O. Box 19143  
Oakland, CA 94619



Mr. Ed Howell, Chief  
Alameda County - Health Care Services Agency  
Dept. of Environmental Health  
Div. of Hazardous Materials  
80 Swan Way, Room 200  
Oakland, CA 94621



# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

|                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|--|
| <b>EMERGENCY</b><br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED?</b><br><input type="checkbox"/> YES <input type="checkbox"/> NO |                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>FOR LOCAL AGENCY USE ONLY</b><br>I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM. |                                                                               |  |
| <b>REPORT DATE</b><br>0 M 3 D 0 Y 2 D 9 Y 4 Y                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>CASE #</b>                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                      | SIGNED: <i>[Signature]</i> DATE: 5/14/89                                                                                                                                                  |                                                                               |  |
| <b>REPORTED BY</b>                                                                      | <b>NAME OF INDIVIDUAL FILING REPORT</b><br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                              | <b>PHONE</b><br>(510) 436-4700                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                           | <b>SIGNATURE</b><br><i>[Signature]</i>                                        |  |
|                                                                                         | <b>REPRESENTING</b><br><input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD<br><input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                              | <b>COMPANY OR AGENCY NAME</b><br>Zima Center Corporation                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>ADDRESS</b><br>2951 High Street, Oakland, CA 94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>RESPONSIBLE PARTY</b>                                                                | <b>NAME</b><br>Zima Center Corporation <input type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                              | <b>CONTACT PERSON</b><br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                           | <b>PHONE</b><br>(510) 436-4700                                                |  |
|                                                                                         | <b>ADDRESS</b><br>2951 High Street, Oakland, CA 94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>SITE LOCATION</b>                                                                    | <b>FACILITY NAME (IF APPLICABLE)</b><br>High Street Gas Station                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                              | <b>OPERATOR</b><br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                           | <b>PHONE</b><br>(510) 436-4700                                                |  |
|                                                                                         | <b>ADDRESS</b><br>2951 High Street, Oakland, CA 94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>CROSS STREET</b><br>Penninan Avenue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>IMPLEMENTING AGENCIES</b>                                                            | <b>LOCAL AGENCY</b><br>Alameda County Health Care Services Agency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                              | <b>CONTACT PERSON</b><br>Ms. Juliet Shin                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                           | <b>PHONE</b><br>(510) 271-4530                                                |  |
|                                                                                         | <b>REGIONAL BOARD</b><br>Regional Water Quality Control Board-San Francisco Region                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                              | <b>PHONE</b><br>(510) 286-1055                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                           |                                                                               |  |
| <b>SUBSTANCES INVOLVED</b>                                                              | <b>(1) NAME</b><br>Waste Oil / GAS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           | <b>QUANTITY LOST (GALLONS)</b><br><input checked="" type="checkbox"/> UNKNOWN |  |
|                                                                                         | <b>(2)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>DISCOVERY/ABATEMENT</b>                                                              | <b>DATE DISCOVERED</b><br>0 M 9 D 1 Y 3 D 9 Y 3 Y                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                              | <b>HOW DISCOVERED</b><br><input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS<br><input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER                                                                                                                                |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>DATE DISCHARGE BEGAN</b><br><input checked="" type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                              | <b>METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)</b><br><input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING<br><input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE<br><input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>HAS DISCHARGE BEEN STOPPED?</b><br><input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>SOURCE/ CAUSE</b>                                                                    | <b>SOURCE OF DISCHARGE</b><br><input checked="" type="checkbox"/> TANK LEAK / A.S.P.A. <input checked="" type="checkbox"/> UNKNOWN<br><input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                              | <b>CAUSE(S)</b><br><input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL<br><input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER                                                                                                                                                                        |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>CASE TYPE</b><br>CHECK ONE ONLY<br><input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>CURRENT STATUS</b>                                                                   | CHECK ONE ONLY<br><input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION<br><input type="checkbox"/> LEAK BEING CONFIRMED <input checked="" type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS<br><input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY                                                                                                                                      |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>REMEDIAL ACTION</b><br>CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)<br><input type="checkbox"/> CAP SITE (CD) <input checked="" type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT)<br><input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS)<br><input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> OTHER (OT) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>COMMENTS</b>                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |

# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
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| EMERGENCY<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED?<br><input type="checkbox"/> YES <input type="checkbox"/> NO |                                                                                                                                                                                                                                                                                                                                                                                                               | FOR LOCAL AGENCY USE ONLY<br>I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM. |                                                                        |  |
| REPORT DATE<br>0 M 3 M 0 D 2 D 9 Y 4 Y                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | CASE #                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                               | SIGNED _____ DATE 3/14/94                                                                                                                                                          |                                                                        |  |
| REPORTED BY                                                                      | NAME OF INDIVIDUAL FILING REPORT<br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                       | PHONE<br>(510) 436-4700                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                    | SIGNATURE<br>                                                          |  |
|                                                                                  | REPRESENTING<br><input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD<br><input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                       | COMPANY OR AGENCY NAME<br>Zima Center Corporation                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | ADDRESS<br>2951 High Street    Oakland    CA    94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
| RESPONSIBLE PARTY                                                                | NAME<br>Zima Center Corporation <input type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                       | CONTACT PERSON<br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                    | PHONE<br>(510) 436-4700                                                |  |
|                                                                                  | ADDRESS<br>2951 High Street    Oakland    CA    94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
| SITE LOCATION                                                                    | FACILITY NAME (IF APPLICABLE)<br>High Street Gas Station                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                       | OPERATOR<br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                    | PHONE<br>(510) 436-4700                                                |  |
|                                                                                  | ADDRESS<br>2951 High Street    Oakland    CA    94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | CROSS STREET<br>Penniman Avenue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
| IMPLEMENTING AGENCIES                                                            | LOCAL AGENCY AGENCY NAME<br>Alameda County Health Care Services Agency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                       | CONTACT PERSON<br>Ms. Juliet Shin                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                    | PHONE<br>(510) 271-4530                                                |  |
|                                                                                  | REGIONAL BOARD<br>Regional Water Quality Control Board-San Francisco Region                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       | PHONE<br>(510) 286-1055                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                    |                                                                        |  |
| SUBSTANCES INVOLVED                                                              | (1) NAME<br>Waste Oil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    | QUANTITY LOST (GALLONS)<br><input checked="" type="checkbox"/> UNKNOWN |  |
|                                                                                  | (2) _____ <input type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
| DISCOVERY/ABATEMENT                                                              | DATE DISCOVERED<br>0 M 9 M 1 D 3 D 9 Y 3 Y                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                       | HOW DISCOVERED<br><input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS<br><input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER                                                                                                                                |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | DATE DISCHARGE BEGAN<br>_____ <input checked="" type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                       | METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)<br><input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING<br><input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE<br><input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | HAS DISCHARGE BEEN STOPPED?<br><input type="checkbox"/> YES <input type="checkbox"/> NO    IF YES, DATE _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
| SOURCE/CAUSE                                                                     | SOURCE OF DISCHARGE<br><input checked="" type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN<br><input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                       | CAUSE(S)<br><input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL<br><input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER                                                                                                                                                                        |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | CHECK ONE ONLY<br><input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
| CURRENT STATUS                                                                   | CHECK ONE ONLY<br><input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION<br><input type="checkbox"/> LEAK BEING CONFIRMED <input checked="" type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS<br><input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY                                                                                                                                                                      |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)<br><input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT)<br><input type="checkbox"/> CONTAINMENT BARRIER (CB) <input checked="" type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS)<br><input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS)<br><input type="checkbox"/> OTHER (OT) _____ |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |
|                                                                                  | COMMENTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                    |                                                                        |  |

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

March 11, 1994

Mr. Mohammad Mashhoon  
2951 High St.  
Oakland, CA 94619

STID 1038

Re: Investigations at 2951 High St., Oakland, California

Dear Mr. Mashhoon,

Per a conversation between Blessy Torres, State Water Resources Control Board, and myself on March 11, 1994, the above site was **conditionally** accepted into the State Trust Fund on March 9, 1994. The State is anticipating reviewing all the case files this Summer in order to confirm whether the site is eligible and in compliance, and if the site is determined to be eligible, the State can begin issuing reimbursements for investigations at the site in the latter part of this year. **However**, part of the eligibility requirements for the Trust fund is that you remain in compliance and diligently pursue investigations and remediation, including the period in which you are waiting for the State's Letter of Commitment.

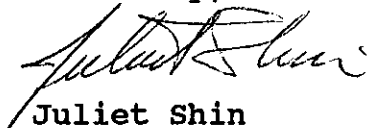
Therefore, you are required to begin investigations at the above site, as outlined in the January 13, 1994 letter (refer to the attached copy of the letter). The referenced PSA work plan is due **within 45 days** of the date of this letter.

Additionally, it is the understanding of this office that the excavated soil from the waste oil tank pit is still stockpiled on site. You are required to dispose of this soil to a certified facility **within 15 days** of the date of this letter. As stipulated in the January 13, 1994 letter, you are required to submit documentation showing that the excavated soil was hauled off site to an appropriate disposal facility **within 25 days** of the date of this letter.

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

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
March 11, 1994  
Page 2 of 2

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

**Attachment**

cc: Mr. Clifford Lee  
645 16th Ave.  
San Francisco, CA 94118

Gerald Lam  
1407 Webster St., Ste 216  
Oakland, CA 94612

John Warner  
21 Tamal Vista Blvd., Ste 196  
Corte Madera, CA 94925

Edgar Howell-File(JS)

# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

|                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|--|
| <b>EMERGENCY</b><br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED?</b><br><input type="checkbox"/> YES <input type="checkbox"/> NO |                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>FOR LOCAL AGENCY USE ONLY</b><br>I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM. |                                                                               |  |
| <b>REPORT DATE</b><br>03/02/94                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>CASE #</b><br>_____                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>SIGNED</b> <i>[Signature]</i> <b>DATE</b> 3/14/94                                                                                                                                      |                                                                               |  |
| <b>REPORTED BY</b>                                                                      | <b>NAME OF INDIVIDUAL FILING REPORT</b><br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                              | <b>PHONE</b><br>(510) 436-4700                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                           | <b>SIGNATURE</b><br><i>[Signature]</i>                                        |  |
|                                                                                         | <b>REPRESENTING</b><br><input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                              | <b>COMPANY OR AGENCY NAME</b><br>Zima Center Corporation                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>ADDRESS</b><br>2951 High Street, Oakland, CA 94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>RESPONSIBLE PARTY</b>                                                                | <b>NAME</b><br>Zima Center Corporation <input type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                              | <b>CONTACT PERSON</b><br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                           | <b>PHONE</b><br>(510) 436-4700                                                |  |
|                                                                                         | <b>ADDRESS</b><br>2951 High Street, Oakland, CA 94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>SITE LOCATION</b>                                                                    | <b>FACILITY NAME (IF APPLICABLE)</b><br>High Street Gas Station                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                              | <b>OPERATOR</b><br>Mohammad A. Mashhoon                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                           | <b>PHONE</b><br>(510) 436-4700                                                |  |
|                                                                                         | <b>ADDRESS</b><br>2951 High Street, Oakland, CA 94619                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>CROSS STREET</b><br>Penniman Avenue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>IMPLEMENTING AGENCIES</b>                                                            | <b>LOCAL AGENCY</b><br>Alameda County Health Care Services Agency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                              | <b>AGENCY NAME</b><br>Alameda County Health Care Services Agency                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                           | <b>CONTACT PERSON</b><br>Ms. Juliet Shin                                      |  |
|                                                                                         | <b>REGIONAL BOARD</b><br>Regional Water Quality Control Board-San Francisco Region                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           | <b>PHONE</b><br>(510) 286-1055                                                |  |
| <b>SUBSTANCES INVOLVED</b>                                                              | <b>(1) NAME</b><br>Waste Oil / GAS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           | <b>QUANTITY LOST (GALLONS)</b><br><input checked="" type="checkbox"/> UNKNOWN |  |
|                                                                                         | <b>(2)</b><br><input type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>DISCOVERY/ABATEMENT</b>                                                              | <b>DATE DISCOVERED</b><br>03/01/94                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                              | <b>HOW DISCOVERED</b><br><input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS<br><input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER                                                                                                                                |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>DATE DISCHARGE BEGAN</b><br><input checked="" type="checkbox"/> UNKNOWN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                              | <b>METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)</b><br><input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING<br><input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE<br><input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>HAS DISCHARGE BEEN STOPPED?</b><br><input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE: _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>SOURCE/ CAUSE</b>                                                                    | <b>SOURCE OF DISCHARGE</b><br><input checked="" type="checkbox"/> TANK LEAK / AND/OR <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                              | <b>CAUSE(S)</b><br><input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL<br><input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER                                                                                                                                                                        |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>CASE TYPE</b><br><input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
| <b>CURRENT STATUS</b>                                                                   | <b>CHECK ONE ONLY</b><br><input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION<br><input type="checkbox"/> LEAK BEING CONFIRMED <input checked="" type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS<br><input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY                                                                                                                                                                |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)</b><br><input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT)<br><input type="checkbox"/> CAP SITE (CO) <input checked="" type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS)<br><input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS)<br><input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> OTHER (OT) |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |
|                                                                                         | <b>COMMENTS</b><br><br>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                           |                                                                               |  |



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

March 11, 1994

Mr. Clifford Lee  
645 16th Ave.  
San Francisco, CA 94118

STID 1038

Re: Investigations at 2951 High St., Oakland, California

Dear Mr. Lee,

Per a conversation between Blessy Torres, State Water Resources Control Board, and myself on March 11, 1994, the above site was **conditionally** accepted into the State Trust Fund on March 9, 1994. The State is anticipating reviewing all the case files this Summer in order to confirm whether the site is eligible and in compliance, and if the site is determined to be eligible, the State can begin issuing reimbursements for investigations at the site in the latter part of this year. **However**, part of the eligibility requirements for the Trust fund is that you remain in compliance and diligently pursue investigations and remediation, including the period in which you are waiting for the State's Letter of Commitment.

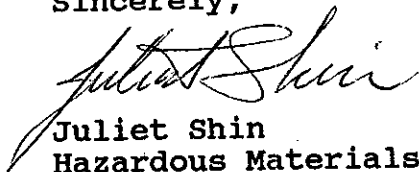
Therefore, you are required to begin investigations at the above site, as outlined in the January 13, 1994 letter (refer to the attached copy of the letter). The referenced PSA work plan is due **within 45 days** of the date of this letter.

Additionally, it is the understanding of this office that the excavated soil from the waste oil tank pit is still stockpiled on site. You are required to dispose of this soil to a certified facility **within 15 days** of the date of this letter. As stipulated in the January 13, 1994 letter, you are required to submit documentation showing that the excavated soil was hauled off site to an appropriate disposal facility **within 25 days** of the date of this letter.

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

Mr. Clifford Lee  
Re: 2951 High St.  
March 11, 1994  
Page 2 of 2

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

**Attachment**

**cc:**

Mr. Mohammad Mashhoon  
2951 High St.  
Oakland, CA 94619

Gerald Lam  
1407 Webster St., Ste 216  
Oakland, CA 94612

John Warner  
21 Tamal Vista Blvd., Ste 196  
Corte Madera, CA 94925

Edgar Howell-File(JS)

STEINHART & FALCONER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS

333 MARKET STREET, THIRTY-SECOND FLOOR  
SAN FRANCISCO, CALIFORNIA 94105-2150

(415) 777-3999

FACSIMILE (415) 442-0856

FACSIMILE (415) 442-0839

January 21, 1994

Ms. Juliet Shin  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
80 Swan Way, Room 200  
Oakland, California 94621

*Letter only*

91 JAN 24 PM 2:19  
HALLCO  
HAZMAT

Re: Zima Center, Inc./  
2951 High Street, Oakland

Dear Ms. Shin:

We represent Atlantic Richfield Company ("ARCO") and write this letter in response to John Warner's letter of January 3, 1994, on behalf of Zima Center, Inc. ARCO categorically rejects Mr. Warner's premise that ARCO should be held accountable for any contamination caused by the abandoned waste oil tank.

ARCO sold the entire gas station, specifically including the underground tanks present or formerly present at the 2951 High Street location, in March 1983 to Clifford Lee. Mr. Lee had been leasing and operating the station and the underground tanks, alone and with Mr. Lawrence Huey, since 1973. ARCO has had no control over the operation of this facility since its sale to Mr. Lee in 1973. Mr. Lee sold the property in 1989 to Zima Center, Inc., which has been the sole owner of the property and all tanks located on the property since that date.

At the time the tanks were sold to Mr. Lee there were no indications that any of them had caused or were causing a release of any substance. Mr. Warner is aware of these facts. He may not, however, be aware that the federal RCRA and state Hazardous Waste Control Law and Porter-Cologne Water Quality Control Act all impose obligations on the current owners and operators of tanks and of land where an underground storage tank leak has occurred (see, e.g., 40 C.F.R. § 280.12(a) and 23 C.C.R. § 2720), or that his client should have met financial responsibility requirements for these tanks (40 C.F.R. §§ 280.90-280.111; H & S Code § 25299.32).

January 21, 1994  
Ms. Juliet Shin  
Page 2

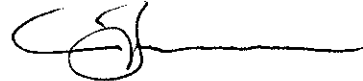
There is no indication that ARCO had control of the underground tanks located at 2951 High Street at the time of any unauthorized release from the tank. On the other hand, Zima Center had sole control over the site and has knowingly failed to take reasonable and necessary steps to assure compliance with the state Hazardous Waste Control Law and Porter-Cologne Water Quality Control Act, in violation of H & S Code § 25299.66. These violations include:

1. The failure to timely report an alleged fuel spill during delivery by Haber Oil in 1990.
2. The failure to timely fulfill earlier formal requests by your office for technical reports pursuant to California Water Code § 13267(b).
3. The failure to remove or properly monitor and test an abandoned waste oil tank.
4. The failure to maintain daily inventory reconciliation records. (23 C.C.R. §§ 2641 and 2712.)
5. The failure to maintain written hazardous materials management monitoring and spill prevention plans. (23 C.C.R. §§ 2711(a)(a) and 2712 (c).)
6. The failure to timely submit and subsequently perform an investigative work plan.
7. The failure to perform inventory reconciliation.
8. The failure to record quarterly monitor fuel inventory disparities. (23 C.C.R. § 2644(e), (f).)
9. The failure to annually test all underground tanks at the site. (23 C.C.R. §§ 2641(5)(d) and 2643 (c).)
10. The failure to report a fuel spill purportedly occurring on February 17, 1992, during fuel delivery by Haber Oil Products (see testimony of Mohammad Mashoon, president of Zima Center, Inc., at pp. 58-70, enclosed).

January 21, 1994  
Ms. Juliet Shin  
Page 3

Mr. Warner's contentions regarding ARCO's control over this site are inaccurate and without evidentiary basis.

Very truly yours,

A handwritten signature in black ink, appearing to read "EL Laurence", with a long horizontal flourish extending to the right.

Eric L. Laurence

ELL:ems  
cc: John G. Warner, Esq.

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

January 13, 1994

Mr. Mohammad Mashhoon  
2951 High St.  
Oakland, CA 94619

STID 1038

Re: Required investigations at 2951 High St., Oakland, CA

Dear Mr. Mashhoon,

Per Section 2720, Article 11, Title 23 California Code of Regulations, you have been designated as one of the Responsible Parties for the investigations and cleanup of the observed petroleum hydrocarbon contamination at the above site. This regulation includes the following as the definition of a Responsible Party:

- o Any person who owns or operates an underground storage tank used for the storage of any hazardous substances;
- o In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use;
- o Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred; and
- o Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance.

Based on the above definitions and that fact that you are the current property owner, you have been named a Responsible Party for the above site.

In September 1993, Alpha Geo Services removed one 300-gallon waste oil underground storage tank (UST). Analysis of the soil sample collected from beneath this UST identified levels of Total Petroleum Hydrocarbons as gasoline (TPHg) at 40 parts per million (ppm), Total Oil & Grease (TOG) at 120 ppm, and levels of chlorinated hydrocarbons, heavy metals, and benzene, toluene, ethylbenzene, and xylenes (BTEX) above detection limits. Consequently, further excavation of the tank pit was conducted on October 14 and 15, 1993. A total of five soil samples were

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
January 13, 1994  
Page 2 of 5

collected from the pit, four from the sidewalls and one from the bottom. Levels of TPHg, BTEX, heavy metals, and tetrachloroethylene were detected above detection limits. Additionally, elevated concentrations of TOG were identified, primarily from the northeast wall of the pit at 3,700 ppm.

In addition to the above observed release, subsurface investigations conducted at the site by United Soil Engineering in March 1990 identified up to 620 ppm Total Petroleum Hydrocarbons from 5 feet below ground surface.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of **both soil and ground water** contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. It appears that, in the case of this site, the nearest UST site with monitoring wells is over 1,000 feet away. Therefore, three monitoring wells must be installed **at the site in order to characterize the ground water gradient flow**. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
January 13, 1994  
Page 3 of 5

- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for TPHg, TOG, BTEX, Chlorinated hydrocarbons (using Method 8010 or 8240), and heavy metals.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

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



Mr. Mohammad Mashhoon  
Re: 2951 High St.  
January 13, 1994  
Page 4 of 5

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

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

Lastly, you are required to submit documentation showing that the excavated soil was hauled off site to an appropriate disposal facility. **This documentation must be submitted within 15 days, or by January 27, 1994** of the date of this letter.

The State Water Resources Control Board has a Petroleum Underground Storage Tank Cleanup Fund available to sites to assist in investigations and cleanup. This office encourages you to look into applying to this fund. The address and phone number of the trust fund is:

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund Program  
2014 T Street, Ste 130  
P.O. Box 944212  
Sacramento, CA 94244-2120  
(916) 739-2475

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
January 13, 1994  
Page 5 of 5

If you have any questions about the fund, you can contact Blessy Torres at (916) 227-4535. Any other questions can be directed to me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Noori Ameli  
Soil Tech Engineering, Inc.  
298 Brokaw Road  
Santa Clara, CA 95050

Mr. Clifford Lee  
645 16th Ave.  
San Francisco, CA 94118

Gerald Lam  
1407 Webster St., Ste 216  
Oakland, CA 94612

John Warner  
21 Tamal Vista Blvd., Ste 196  
Corte Madera, CA 94925

Edgar Howell-File(JS)

LAW OFFICES OF  
JOHN G. WARNER

21 TAMAL VISTA BLVD., SUITE 196  
CORTE MADERA, CALIFORNIA 94925

ALCO  
HAZMAT

94 JAN 11 AM 10:55

ATTORNEY  
JOHN G. WARNER

LEGAL ASSISTANT  
TINA HILGER

SECRETARY  
HEDI ROSEN

TELEPHONE  
(415) 924-2640

FACSIMILE  
(415) 927-0608

January 3, 1994

Juliet Shin  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
80 Swan Way, Room 200  
Oakland, CA 94621

Re: Required investigations at 2951 High St., Oakland, CA.

Dear Ms. Shin:

As you know, I am counsel for Zima Center, Inc.

Zima has forwarded to me your letter dated December 29, 1993 for response.

First, it should be noted that Zima does not have funds with which to carry out the soil and ground water investigations indicated in your letter.

It should also be noted that the underground storage tank in question was installed by a previous owner, Atlantic Richfield Company (ARCO). We suggest that you contact ARCO directly and have ARCO pay for this remediation work. ARCO's attorney is:

Jeffery Hamerling  
Steinhart & Falconer  
333 Market Street, 32nd Floor  
San Francisco, CA 94105-2150  
Telephone (415) 777-3999  
Facsimile (415) 442-0856

Juliet Shin  
January 3, 1994  
Page 2

The clean up fund indicated on the last page of your letter sounds attractive in theory, but as a practical matter that process takes at least 2 years to process. If you have any procedure available to expedite an application to the clean up fund, please let us know.

Yours truly,

  
John G. Warner <sup>Tm</sup>

JGW:tm  
cc: Mohammed Mashhoon  
Jeffrey Hamerling

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

December 29, 1993

Mr. Mohammad Mashhoon  
2951 High St.  
Oakland, CA 94619

STID 1038

Re: Required investigations at 2951 High St., Oakland, CA

Dear Mr. Mashhoon,

In September 1993, Alpha Geo Services removed one 300-gallon waste oil underground storage tank (UST). Analysis of the soil sample collected from beneath this UST identified levels of Total Petroleum Hydrocarbons as gasoline (TPHg) at 40 parts per million (ppm), Total Oil & Grease (TOG) at 120 ppm, and levels of chlorinated hydrocarbons, heavy metals, and benzene, toluene, ethylbenzene, and xylenes (BTEX) above detection limits. Consequently, further excavation of the tank pit was conducted on October 14 and 15, 1993. A total of five soil samples were collected from the pit, four from the sidewalls and one from the bottom. Levels of TPHg, BTEX, heavy metals, and tetrachloroethylene were detected above detection limits. Additionally, elevated concentrations of TOG were identified, primarily from the northeast wall of the pit at 3,700 ppm.

In addition to the above observed release, subsurface investigations conducted at the site by United Soil Engineering in March 1990 identified up to 620 ppm Total Petroleum Hydrocarbons from 5 feet below ground surface.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of **both soil and ground water** contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
December 29, 1993  
Page 2 of 4

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. It appears that, in the case of this site, the nearest UST site with monitoring wells is over 1,000 feet away. Therefore, **three monitoring wells must be installed at the site in order to characterize the ground water gradient flow.** During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.
  
- o Subsequent to the installation of the monitoring wells, these wells must be **surveyed to an established benchmark**, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected **monthly for the first three months**, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. **Both soil and ground water samples must be analyzed for TPHg, TOG, BTEX, Chlorinated hydrocarbons (using Method 8010 or 8240), and heavy metals.**

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
December 29, 1993  
Page 3 of 4

**The PSA proposal is due within 60 days of the date of this letter.** Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

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

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

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

Lastly, you are required to submit documentation showing that the excavated soil was hauled off site to an appropriate disposal facility. **This documentation must be submitted within 15 days of the date of this letter.**

Mr. Mohammad Mashhoon  
Re: 2951 High St.  
December 29, 1993  
Page 4 of 4

The State Water Resources Control Board has a Petroleum Underground Storage Tank Cleanup Fund available to sites to assist in investigations and cleanup. This office encourages you to look into applying to this fund. The address and phone number of the trust fund is:

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund Program  
2014 T Street, Ste 130  
P.O. Box 944212  
Sacramento, CA 94244-2120  
(916) 739-2475

If you have any questions about the fund, you can contact Blessy Torres at (916) 227-4535. Any other questions can be directed to me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Noori Ameli  
Soil Tech Engineering, Inc.  
298 Brokaw Road  
Santa Clara, CA 95050

Edgar Howell-File(JS)



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 High St. ARCO Today's Date 10/14/93  
 Site Address 2957 High St. 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

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

I.A GENERATOR (Title 22)

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

Comments:

On site to oversee overexcavation sampling of the waste oil tank pit. Confirmation sample (s) collected from the pit need to be analyzed for TPH, BTEX, TPHd, TOG, +8010 constituents, and a wet test needs to be done on this soil for chromium. Extensive staining was noted in soils on southeast sidewall and bottom of pit. Strong odor noted to be emanating from pit. Staining also noted on north east wall at ~ 9' hys + below. (Generally, all sidewalls were stained). Left site before samples were collected since contamination was more extensive than originally estimated. Will come back out to site tomorrow.

I.B TRANSPORTER (Title 22)

- |          |                                                    |       |
|----------|----------------------------------------------------|-------|
|          | <input type="checkbox"/> 32. Applic./Insurance     | 66428 |
|          | <input type="checkbox"/> 33. Comp. Cert./CHP Insp. | 66448 |
|          | <input type="checkbox"/> 34. Containers            | 66465 |
| Manifest | <input type="checkbox"/> 35. Vehicles              | 66465 |
|          | <input type="checkbox"/> 36. EPA ID #s             | 66531 |
|          | <input type="checkbox"/> 37. Correct               | 66541 |
|          | <input type="checkbox"/> 38. HW Delivery           | 66543 |
|          | <input type="checkbox"/> 39. Records               | 66544 |
| Conf're  | <input type="checkbox"/> 40. Name/ Covers          | 66545 |
|          | <input type="checkbox"/> 41. Recyclables           | 66800 |

Rev 6/88

Contact: Noori Ameli  
 Title: \_\_\_\_\_  
 Signature: [Signature]

Inspector: Juliet Skinn  
 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 High St ARCO Today's Date 10/15/93  
 Site Address 2951 High St 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

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   |
| <hr/>             |                             |         |
| Manifest          | 6. Records                  | 66492   |
| ---               | 7. Correct                  | 66484   |
| ---               | 8. Copy sent                | 66492   |
| ---               | 9. Exception                | 66484   |
| ---               | 10. Copies Rec'd            | 66492   |
| <hr/>             |                             |         |
| Misc.             | 11. Treatment               | 66371   |
| ---               | 12. On-site Disp. (H.S.&C.) | 26189.5 |
| ---               | 13. Ex Haz. Waste           | 66570   |
| <hr/>             |                             |         |
| Prevention        | 14. Communications          | 67121   |
| ---               | 15. Aisle Space             | 67124   |
| ---               | 16. Local Authority         | 67126   |
| ---               | 17. Maintenance             | 67120   |
| ---               | 18. Training                | 67105   |
| <hr/>             |                             |         |
| Confin. Agency    | 19. Prepared                | 67140   |
| ---               | 20. Name List               | 67141   |
| ---               | 21. Copies                  | 67141   |
| ---               | 22. Emg. Coord. Tmg.        | 67144   |
| <hr/>             |                             |         |
| 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   |

Comments:

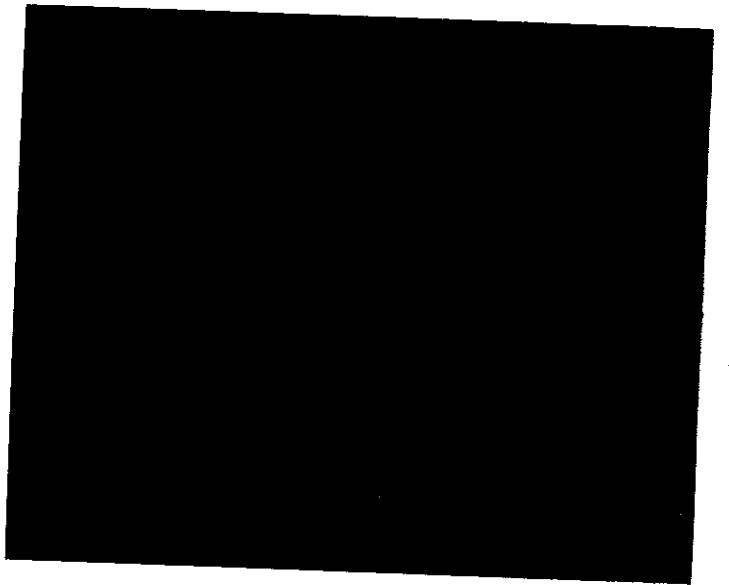
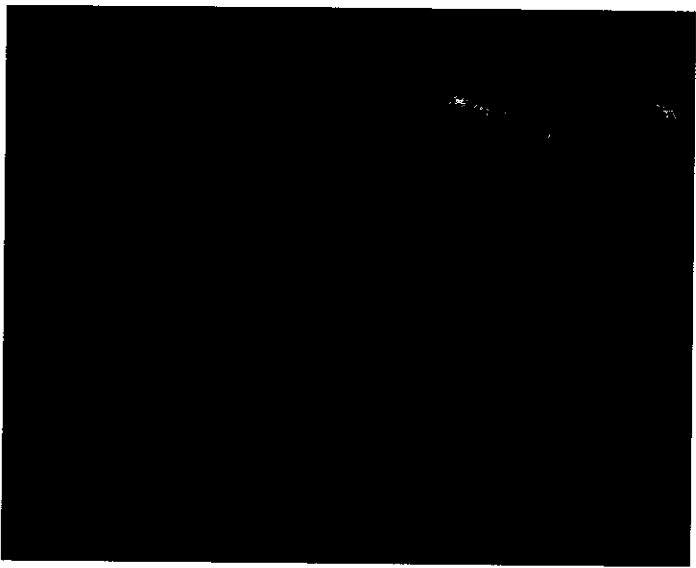
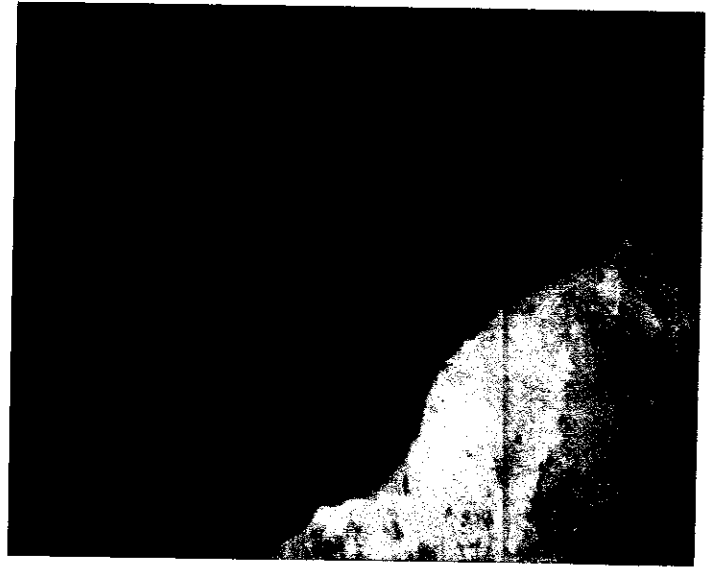
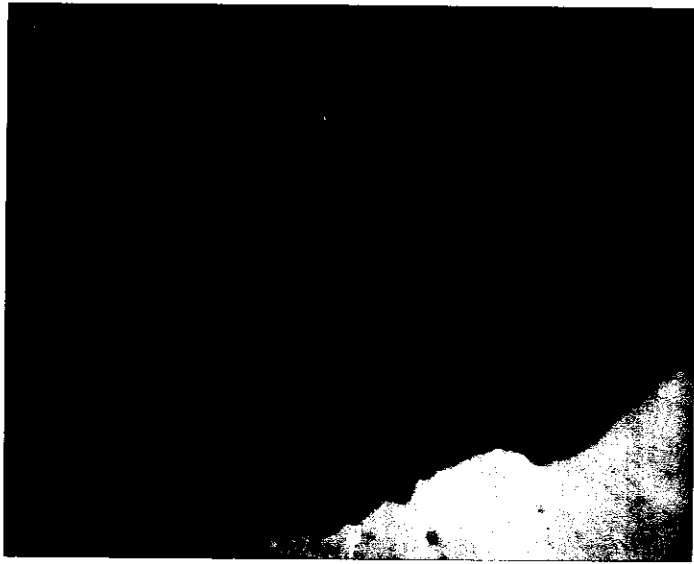
Came back out to site to continue oversight of tank pit excavation that began yesterday. The pit had been enlarged to 11'x12'x12' deep. The southern sidewall of the pit, the side that is parallel w/ adjacent building, is only ~3'6" away from building. Although extensive soil staining remains in place on all four sidewalls, further excavation along the building does not seem possible, due to fear of undermining building. Stained soils have strong odor to it. The southeast and south/southwest sidewalls have staining from only 2'-3' bgs down to bottom (ie. ~12' bgs). May be partially due to overflow. Strong odor emanating from pit of hydrocarbons. Soil samples were collected from other sidewalls. The sidewall sample that had a bad odor was from the southeast wall. One soil sample will be collected from stockpiled soil and will be analyzed for all waste oil constituents except for 8270. All other samples from pit will also be analyzed for these constituents. Tank pit will remain open for now & will be secured. Stockpiled soil will be covered.

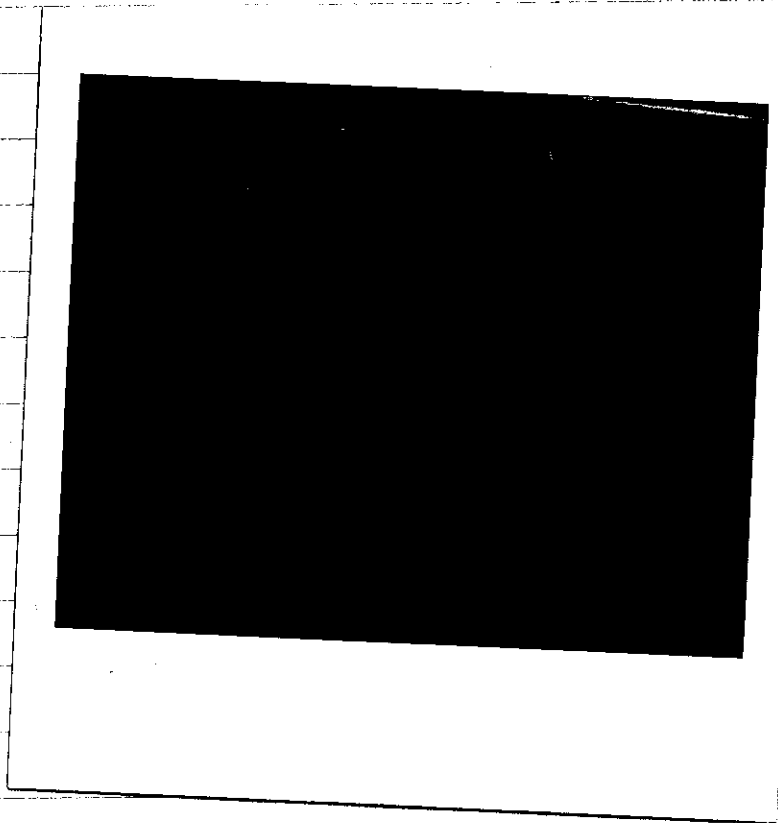
I.B TRANSPORTER (Title 22)

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

Rev 6/88

Contact: Noori Ameli, Soil Tech Engineers  
 Title: \_\_\_\_\_ Inspector: Juliet Shin  
 Signature: [Signature] Signature: Juliet Shin





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

### II.A BUSINESS PLANS (Title 19)

- \_\_\_ 1. Immediate Reporting 2703
- \_\_\_ 2. Bus. Plan Sids. 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. MATLS

- \_\_\_ 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                  |
| ___ 6. Method               |                                            |
| 1) Monthly Test             |                                            |
| 2) Daily Vadose             |                                            |
| Semi-annual gndwater        |                                            |
| One time sols               |                                            |
| 3) Daily Vadose             |                                            |
| One time sols               |                                            |
| Annual tank test            |                                            |
| 4) Monthly Gndwater         |                                            |
| One time sols               |                                            |
| 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 teting          |                                            |
| 8) Annual Tank Testing      |                                            |
| Daily Inventory             |                                            |
| 9) Other _____              |                                            |
| ___ 7. Precs Tank Test 2643 |                                            |
| Date: _____                 |                                            |
| ___ 8. Inventory Rec. 2644  |                                            |
| ___ 9. Soil Testing . 2646  |                                            |
| ___ 10. Ground Water. 2647  |                                            |
| ___ 11. Monitor Plan 2632   |                                            |
| ___ 12. Access. Secure 2634 |                                            |
| ___ 13. Plans Submit 2711   |                                            |
| Date: _____                 |                                            |
| ___ 14. As Built 2635       |                                            |
| Date: _____                 |                                            |

Site ID # \_\_\_\_\_ Site Name High St - Arco (Texaco) Today's Date 9/13/93

Site Address 2951 High St

City Oak Zip 94619 Phone \_\_\_\_\_

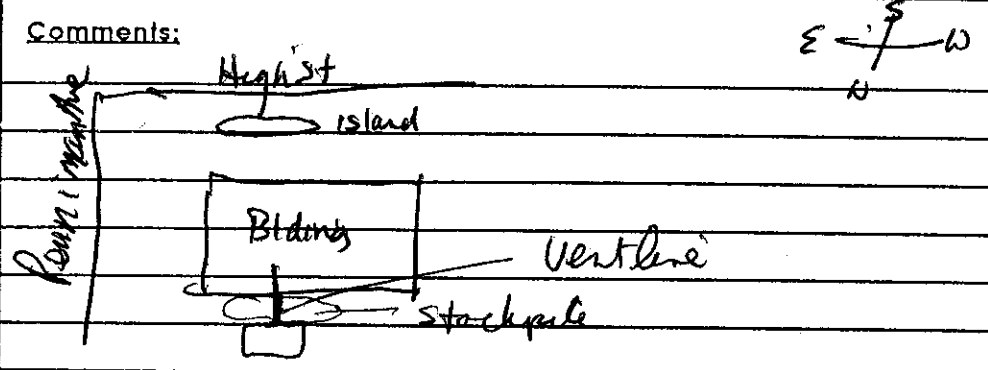
\_\_\_ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

#### 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)

#### Comments:



1-250 gallon waste out tank in rear of station  
 Short ~~line~~ <sup>line</sup> leading from tank <sup>to side of</sup> bldg.  
 HHA tank header, #401996 exp 1/94  
 Mr. Mashoon prop owner present  
 Contractor: Alpha Geo (Soil Tech)  
 Soils are clay w/ sandy backfill  
 Frank Haredi & Norri Aneli present  
 <3% LEL & 0% O<sub>2</sub>  
 - 5 cu yd of stackpile generated  
 small amt of fluid in pit - see photo. ~1"  
 Hole visible in bottom of tank - see photo  
 Tank is steel, no wrapping observed  
 1- v. small hole ~ 1/8" on end of tank  
 1- additional hole ~ 1/8" on bottom

II, III

Contact: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Inspector: B Chan  
 Signature: \_\_\_\_\_

#2

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 High St Arco (Jaw) Today's Date 9/13/93

### 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)

Site Address 2951 High St

City Oakland Zip 94619 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

### II.B ACUTELY HAZ. MATLS

- \_\_\_ 10. Registration Form Filed 25533(a)
- \_\_\_ 11. Form Complete 25533(b)
- \_\_\_ 12. RMPP Contents 25534(c)
- \_\_\_ 13. Implement Sch. Req'd? (Y/N)
- \_\_\_ 14. OnSite 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

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

### Comments:

### 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<br>Semi-annual groundwater<br>One time sols                             |
|                               | 3) Daily Vadose<br>One time sols<br>Annual tank test                                    |
|                               | 4) Monthly Groundwater<br>One time sols                                                 |
|                               | 5) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det<br>Vadose/gndwater mon. |
|                               | 6) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det                         |
|                               | 7) Weekly Tank Gauge<br>Annual tank testing                                             |
|                               | 8) Annual Tank Testing<br>Daily Inventory                                               |
|                               | 9) Other _____                                                                          |
| New Tanks                     | ___ 7. Precip. Tank Test 2643                                                           |
|                               | Date: _____                                                                             |
|                               | ___ 8. Inventory Rec. 2644                                                              |
|                               | ___ 9. Soil Testing 2646                                                                |
|                               | ___ 10. Ground Water 2647                                                               |
|                               | ___ 11. Monitor Plan 2632                                                               |
|                               | ___ 12. Access, Secure 2634                                                             |
|                               | ___ 13. Plans Submit 2711                                                               |
|                               | Date: _____                                                                             |
|                               | ___ 14. As Built 2635                                                                   |
| Date: _____                   |                                                                                         |

- 92220717, Manifest #

- The obviously contaminated soil was dug out & placed into 55 gal drums. Pit is approximately 8' x 8' x 7'

- Over excavated hole to ~ 9' bringing out blue gray sandy <sup>gravelly</sup> material w/ odor. 1 sple taken @ 9' in middle of pit

- Over excavated soil ~ 2 additional cyd 1- stockpile sple taken from the over excavated pile. Sple smell of oil (degreasing odor) left site @ 1100.

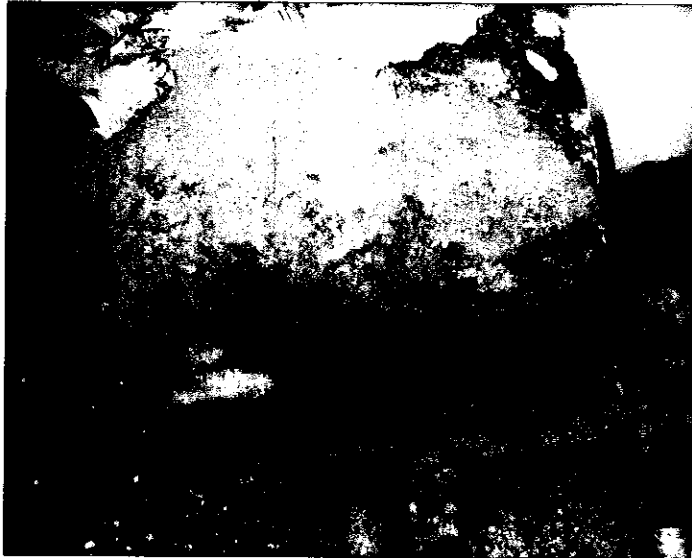
Run pit sple for all waste oil parameters. Contact J. Show if you do not want to run the spoils sple for the entire waste oil parameters.

Rev 6/88

II, III

Contact: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Signature: [Signature]

Inspector: BChan  
 Signature: [Signature]



Tank as removed from pit  
2951 Heggs St 9/13/93



2951 Heggs St 9/13/93  
250 gallon waste oil tank



Shows bottom of pit  
2951 Heggs St. 9/13/93



Obvious hole visible  
9/13/93 2951 Heggs St

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and 2 for additional services.
- Complete items 3, and 4.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: (JM) #1038

Mahammed Mashoon  
5 Admiral Drive #301  
Emeryville CA 94608

4a. Article Number  
P 113 815 217

4b. Service Type

Registered  Insured

Certified  COD

Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
11-24-92

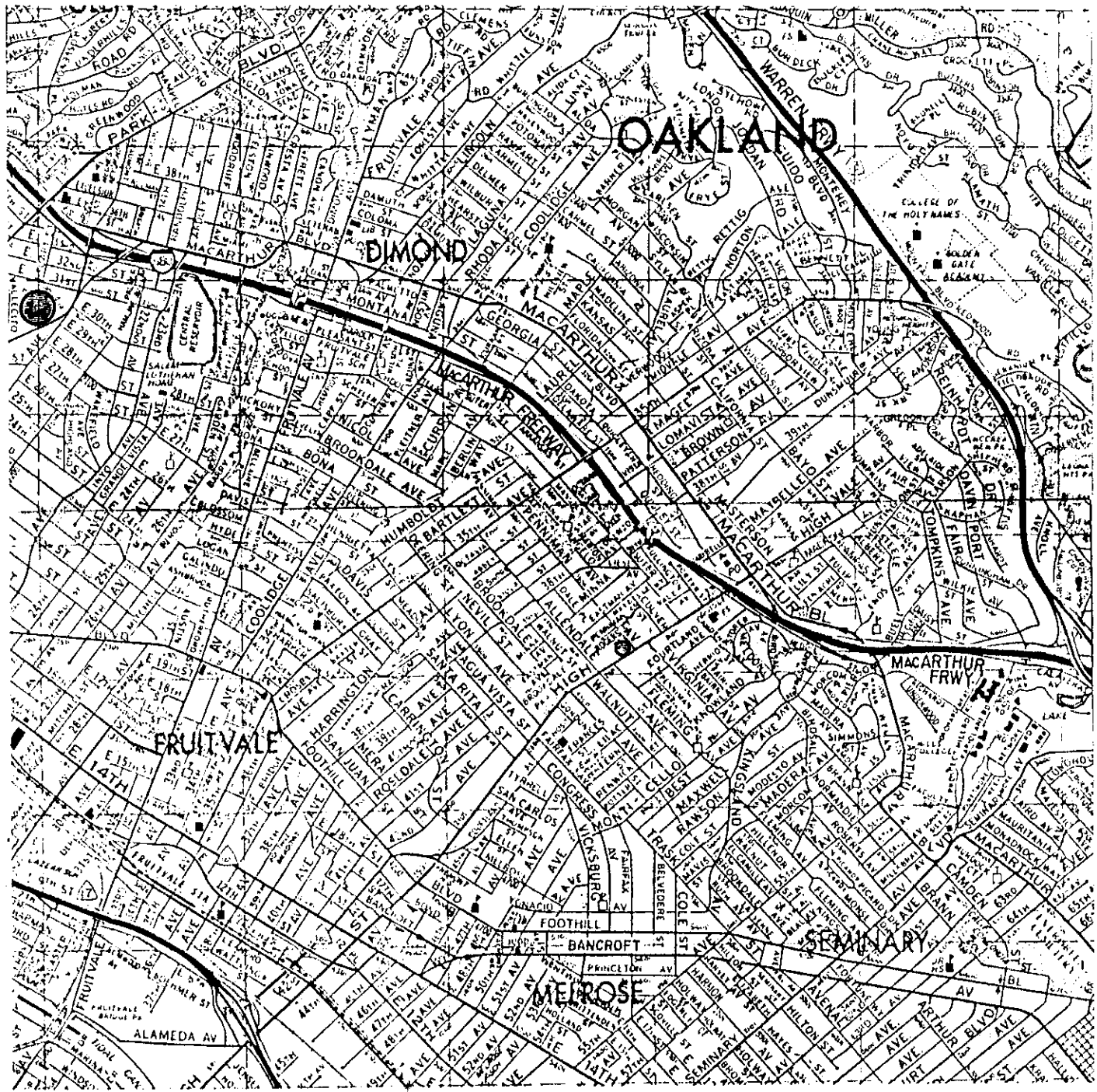
5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.





2951 HIGH ST. OAKLAND 94619

**Certificate Of Insurance**

Issue Date 06/22/93

Producer  
SERV Insurance Services, Inc.  
61 Hotel Circle South  
Suite 250  
San Diego, CA 92108

This certificate is issued as a matter of information only and confers no rights upon the certificate holder. This certificate does not amend, extend or alter the coverage afforded by the policies below.

**Companies Affording Coverage**

- Company Letter A: GOLDEN EAGLE (4097)
- Company Letter B: GOLDEN EAGLE (4097)
- Company Letter C: GOLDEN EAGLE (4097)
- Company Letter D:
- Company Letter E:

Code:                      Subcode:

Insured  
PHASEO SERVICES, INC.  
76 BROOKAW RD  
WATA CLARA, CA 95050

**Coverages**

This is to certify that policies of insurance listed below have been issued to the insured named above for the policy period indicated, notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies. Limits shown may have been reduced by paid claims.

| Type Of Insurance                                                                                                                                                                                                                                                                                | Policy Number | Pol. Eff. Date | Pol. Exp. Date | Limits Of Liability             |                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------|----------------|---------------------------------|------------------|
| General Liability<br><input checked="" type="checkbox"/> Commercial General Liability<br><input type="checkbox"/> Claims Made <input checked="" type="checkbox"/> Occur.<br><input type="checkbox"/> Owner's & Contractor's Prot.<br><input checked="" type="checkbox"/> SPECIAL CLASSIFICATIONS | CCP-099913-03 | 04/20/93       | 04/20/94       | General Aggregate               | \$ 1000000       |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Product-Comp/Ops Aggregate      | \$ 0             |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Personal & Advertising Injury   | \$ 1000000       |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Each Occurrence                 | \$ 1000000       |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Fire Damage(Any One Fire)       | \$ 50000         |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Medical Expense(Any One Person) | \$ 5000          |
| Automobile Liability<br><input type="checkbox"/> Any Auto<br><input type="checkbox"/> All Owned Autos<br><input type="checkbox"/> Hired Autos<br><input type="checkbox"/> Non-Owned Autos<br><input type="checkbox"/> Garage Liability<br><input type="checkbox"/>                               | CCP-099913-03 | 04/20/93       | 04/20/94       | Combined Single Limit           | \$ 500000        |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Bodily Injury (Per Person)      | \$               |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Bodily Injury (Per Accident)    | \$               |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Property Damage                 | \$               |
| Excess Liability<br><input type="checkbox"/> Umbrella Form<br><input type="checkbox"/> Other Than Umbrella Form                                                                                                                                                                                  |               |                |                | Each Occurrence                 | \$               |
|                                                                                                                                                                                                                                                                                                  |               |                |                | Aggregate                       | \$               |
| Worker's Compensation<br>And<br>Employer's Liability                                                                                                                                                                                                                                             |               |                |                | Statutory                       |                  |
|                                                                                                                                                                                                                                                                                                  |               |                |                | \$ (Each Accident)              |                  |
|                                                                                                                                                                                                                                                                                                  |               |                |                | \$ (Disease-Policy Limit)       |                  |
|                                                                                                                                                                                                                                                                                                  |               |                |                | \$ (Disease-Each Employee)      |                  |
| Other<br><input checked="" type="checkbox"/> BUSINESS PERSONAL PROPERTY                                                                                                                                                                                                                          | CCP-099913-03 | 04/20/93       | 04/20/94       | \$ 75000                        | \$500 DEDUCTIBLE |
|                                                                                                                                                                                                                                                                                                  |               |                |                | \$ 0                            |                  |

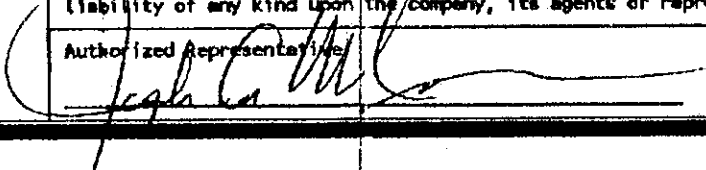
Description Of Operations/Locations/Vehicles/Special Items

**Certificate Holder**

**Cancellation**

Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 30 days written notice to the certificate holder named to the left, but failure to mail such notice shall impose no obligation or liability of any kind upon the company, its agents or representatives.

Authorized Representative



Form 25-S (3/88)

DEPARTMENT OF ENVIRONMENTAL HEALTH  
 HAZARDOUS MATERIALS DIVISION  
 80 SWAN WAY, ROOM 200  
 OAKLAND, CA 94621  
 PHONE NO. 510/271-4320

*Juliet Davis 8/31/93*

*Please comply w/all charges noted in red ink*

**ACCEPTED**

DEPARTMENT OF ENVIRONMENTAL HEALTH  
 450 - 20th Street  
 OAKLAND, CA 94612  
 Telephone: (415) 241-2337

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction.

One copy of these accepted plans must be on the job and available to all contractors and craftsmen involved with the removal.

Any change or alterations of these plans and specifications must be submitted to this Department and by the end Building Inspection Department to determine if such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required inspections:

- \_\_\_\_\_ Removal of Tank and Piping
- \_\_\_\_\_ Sampling
- \_\_\_\_\_ Final Inspection

Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.

**THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.**

**UNDERGROUND TANK CLOSURE PLAN**

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

1. Business Name Zima Center Corporation  
 Business Owner Mohammad Mashhoon

2. Site Address 2951 High Street 15707436-4700  
 City Oakland, CA Zip 94619 Phone 510-636-0261

3. Mailing Address 2951 High Street  
 City Oakland, CA Zip 94619 Phone 510-636-0261

4. Land Owner Mohammad Mashhoon  
 Address 2951 High Street City, State Oakland, CA Zip 94619

5. Generator name under which tank will be manifested High Street Gas

EPA I.D. No. under which tank will be manifested CAC000872440

6. Contractor Alpha Geo Services  
Address 298 Brokaw Road  
City Santa Clara, CA 95050 Phone 408-988-1032  
License Type\* General "A" & C57 ID# 507520

\*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant Soil Tech Engineering, Inc.  
Address 298 Brokaw Road  
City Santa Clara, CA 95050 Phone 408-496-0265

8. Contact Person for Investigation  
Name Frank Hamedi Title General Manager  
Phone 408-496-0265

9. Number of tanks being closed under this plan 1  
Length of piping being removed under this plan \_\_\_\_\_  
Total number of tanks at facility 15

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 Environmental Services EPA I.D. No. CAD0004771168  
Hauler License No. 0334 License Exp. Date 1/31/94  
Address 220 China Basin  
City San Francisco State CA Zip 94107

b) Product/Residual Sludge/Rinsate Disposal Site

Name H&H Environmental Services EPA I.D. No. CAD0004771168  
Address 220 China Basin  
City San Francisco State CA Zip 94107

c) Tank and Piping Transporter

Name Dexanna, Ltd. EPA I.D. No. CAD982438566  
Hauler License No. 2883 License Exp. Date 4/30/94  
Address 3104 Athene Court  
City Concord State CA Zip 94519

d) Tank and Piping Disposal Site

Name H&H Environmental Services EPA I.D. No. CAD0004771168  
Address 220 China Basin  
City San Francisco State CA Zip 94107

11. Experienced Sample Collector

Name Noori Ameli  
Company Soil Tech Engineering, Inc.  
Address 298 Brokaw Road  
City Santa Clara State CA Zip 95050 Phone 408-496-0265

12. Laboratory

Name Priority Environmental Labs  
Address 1764 Houret Court  
City Milpitas State CA Zip 95035  
State Certification No. 1708

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

If yes, describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. Describe methods to be used for rendering tank inert

Dry ice.

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, groundwater, etc.) | Location and Depth of Samples                                                                                                                                      |
|----------|--------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Capacity | Use History (see instructions) |                                                                 |                                                                                                                                                                    |
| 250      | waste oil                      | Soil & groundwater if present                                   | Soil/backfill intergrade into 2 feet of native soil.<br><i>If groundwater is found in pit, two sidewall soil samples shall be collected from each end of tank.</i> |

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

| Excavated/Stockpiled Soil                    |                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>Stockpiled Soil Volume</u><br>(Estimated) | <p>Sampling Plan</p> <p>Soil sample(s) will be placed in brass tubes, sealed with Teflon tape and plastic caps. Samples will be placed on ice and transported to a state-certified lab with chain-of-custody.</p> <p><i>Composite One soil sample per every 50 yd<sup>3</sup> of off site. One descent sample per every 20 yd<sup>3</sup> of stockpiled soil is to be reused on site.</i></p> |

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<br><i>Detection Limits</i> | Method Detection Limit |
|----------------------------------------|-----------------------------------------------------|----------------------------------------------------------------------|------------------------|
| TPH-G                                  | 5030/8015                                           | <i>Soil</i><br>1ppm                                                  | 0.05 ppm               |
| BTEX                                   | 8020 or 8240                                        | <i>Water</i><br>50ppb                                                | 0.5 ppb                |
| TPH-D                                  | 3550                                                | 0.005ppm<br>to 0.5ppm                                                | 0.5ppb                 |
| TPH & BTEX                             | 8260                                                | 1ppm                                                                 | 50ppb                  |
| TOG                                    | 5520 D & F                                          |                                                                      |                        |
| CL HC                                  | 8010 or 8240                                        |                                                                      |                        |
| <del>Fe</del><br>Cd, Cr, Pb, Zn,<br>Ni | } ICAP MAA to detect<br>metals                      |                                                                      |                        |
| PCB                                    |                                                     |                                                                      |                        |
| PCP                                    |                                                     |                                                                      |                        |
| PNA                                    |                                                     |                                                                      |                        |
| CREOSOTE                               |                                                     | 8270                                                                 |                        |

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Compensation Insurance Fund

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 listed 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.

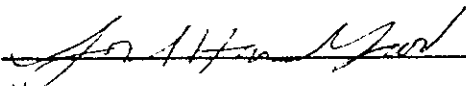
I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not 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) Frank Hamedi

Signature 

Date 8/19/93

Signature of Site Owner or Operator

Name (please type) Mohammad Mashhoon

Signature 

Date 8/19/93



## INSTRUCTIONS

### General Instructions

- \* Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- \* Any cutting into tanks requires local fire department approval.
- \* One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.

### Item Specific Instructions

2. SITE ADDRESS  
Address at which closure is taking place.
5. EPA I.D. NO. under which the tanks will be manifested  
EPA I.D. numbers may be obtained from the State Department of Health Services, 916/324-1781.
6. CONTRACTOR  
Prime contractor for the project.
10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
  - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
  - c) Tanks must be hauled as hazardous waste.
  - d) This is the place where tanks will be taken for cleaning.
15. TANK HISTORY AND SAMPLING INFORMATION  
Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.  
  
Material to be sampled - e.g. water, oil, sludge, soil, etc.  
  
Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS  
See attached Table 2.

17. SITE HEALTH AND SAFETY PLAN

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer;
- b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;
- c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;
- d) For each hazard, identify the action levels (contaminant concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions;
- e) Description of the work habit changes triggered by the above action levels or physical conditions;
- f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies;
- g) Confined space entry procedures (if applicable);
- h) Decontamination procedures;
- i) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, plastic sheeting, security guards, etc.);
- j) Spill containment/emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;
- k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and
- l) Page for employees to sign indicating they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.

NOTE: These requirements are excerpts from 29 CFR Part 1910.120(b)(4), Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN

The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale;
- b) North Arrow;
- c) Property Lines;
- d) Location of all Structures;
- e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
- f) Streets;
- g) Underground conduits, sewers, water lines, utilities;
- h) Existing wells (drinking, monitoring, etc.);
- i) Depth to ground water; and
- j) All existing tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT

The tank closure report should contain the following information:

- a) General description of the closure activities;
- b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.

TABLE #2  
RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR  
UNDERGROUND TANK LEAKS

| <u>HYDROCARBON LEAK</u>                                                         | <u>SOIL ANALYSIS</u>                            |              | <u>WATER ANALYSIS</u> |                  |
|---------------------------------------------------------------------------------|-------------------------------------------------|--------------|-----------------------|------------------|
| Unknown Fuel                                                                    | TPH G                                           | GCFID(5030)  | TPH G                 | GCFID(5030)      |
|                                                                                 | TPH D                                           | GCFID(3550)  | TPH D                 | GCFID(3510)      |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602, 624 or 8260 |
|                                                                                 | TPH AND BTX&E                                   | 8260         |                       |                  |
| Leaded Gas                                                                      | TPH G                                           | GCFID(5030)  | TPH G                 | GCFID(5030)      |
|                                                                                 | BTX&E                                           | 8020 OR 8240 | BTX&E                 | 602 or 624       |
|                                                                                 | TPH AND BTX&E                                   | 8260         | TOTAL LEAD AA         |                  |
|                                                                                 | -----Optional-----                              |              |                       |                  |
|                                                                                 | TEL                                             | DHS-LUFT     | TEL                   | DHS-LUFT         |
|                                                                                 | EDB                                             | DHS-AB1803   | EDB                   | DHS-AB1803       |
| Unleaded Gas                                                                    | TPH G                                           | GCFID(5030)  | TPH G                 | GCFID(5030)      |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602, 624 or 8260 |
|                                                                                 | TPH AND BTX&E                                   | 8260         |                       |                  |
| Diesel, Jet Fuel and Kerosene                                                   | TPH D                                           | GCFID(3550)  | TPH D                 | GCFID(3510)      |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602, 624 or 8260 |
|                                                                                 | TPH AND BTX&E                                   | 8260         |                       |                  |
| Fuel/Heating Oil                                                                | TPH D                                           | GCFID(3550)  | TPH D                 | GCFID(3510)      |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602, 624 or 8260 |
|                                                                                 | TPH AND BTX&E                                   | 8260         |                       |                  |
| Chlorinated Solvents                                                            | CL HC                                           | 8010 or 8240 | CL HC                 | 601 or 624       |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602 or 624       |
|                                                                                 | CL HC AND BTX&E                                 | 8260         | CL HC AND BTX&E       | 8260             |
| Non-chlorinated Solvents                                                        | TPH D                                           | GCFID(3550)  | TPH D                 | GCFID(3510)      |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602 or 624       |
|                                                                                 | TPH AND BTX&E                                   | 8260         | TPH and BTX&E         | 8260             |
| Waste and Used Oil or Unknown<br>(All analyses must be completed and submitted) | TPH G                                           | GCFID(5030)  | TPH G                 | GCFID(5030)      |
|                                                                                 | TPH D                                           | GCFID(3550)  | TPH D                 | GCFID(3510)      |
|                                                                                 | TPH AND BTX&E                                   | 8260         |                       |                  |
|                                                                                 | O & G                                           | 5520 D & F   | O & G                 | 5520 C & F       |
|                                                                                 | BTX&E                                           | 8020 or 8240 | BTX&E                 | 602, 624 or 8260 |
|                                                                                 | CL HC                                           | 8010 or 8240 | CL HC                 | 601 or 624       |
|                                                                                 | ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni |              |                       |                  |
|                                                                                 | METHOD 8270 FOR SOIL OR WATER TO DETECT:        |              |                       |                  |
|                                                                                 | PCB*                                            |              | PCB                   |                  |
|                                                                                 | PCP*                                            |              | PCP                   |                  |
|                                                                                 | PNA                                             |              | PNA                   |                  |
|                                                                                 | CREOSOTE                                        |              | CREOSOTE              |                  |

\* If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.
2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.
5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydrocarbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).
7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).
8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. Standard Methods" 17th Edition, 1989, has changed the 503 series to 5520.
9. PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:

|       | <u>SOIL PPM</u> | <u>WATER PPB</u> |
|-------|-----------------|------------------|
| TPH G | 1.0             | 50.0             |
| TPH D | 1.0             | 50.0             |
| BTX&E | 0.005           | 0.5              |
| O & G | 50.0            | 5,000.0          |

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

| ROUTINE        | MODIFIED PROTOCOL |
|----------------|-------------------|
| ≤ 10 ppm (42%) | ≤ 10 ppm (10%)    |
| ≤ 5 ppm (19%)  | ≤ 5 ppm (21%)     |
| ≤ 1 ppm (35%)  | ≤ 1 ppm (60%)     |

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

10. LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.

11. IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chromatogram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

12. REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

#### EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.

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

January 13, 1994

Clifford Lee  
645 16th Ave.  
San Francisco, CA 94118

STID 1038

Re: Required investigations at 2951 High St., Oakland, CA

Dear Mr. Lee,

Per Section 2720, Article 11, Title 23 California Code of Regulations, you have been designated as one of the Responsible Parties for the investigations and cleanup of the observed petroleum hydrocarbon contamination at the above site. This regulation includes the following as the definition of a Responsible Party:

- o Any person who owns or operates an underground storage tank used for the storage of any hazardous substances;
- o In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use;
- o Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred; and
- o Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance.

You have been designated as a responsible party based on information indicating that you last operated the former waste oil tank, for which an unauthorized release report was recently filed, immediately before the discontinuation of its use. According to the current property owners, they never used this waste oil tank. Per federal court case law (G.J. Leasing et al v. Union Electric, 825 F. Supp. 1363), the definition of discontinuation of use includes the case where the tank was sold to a person who had no use for the tank, or the case where active additions and withdrawals of product/waste from a tank was never conducted.

In September 1993, Alpha Geo Services removed one 300-gallon waste oil underground storage tank (UST). Analysis of the soil sample collected from beneath this UST identified levels of Total



Mr. Clifford Lee  
Re: 2951 High St.  
January 13, 1994  
Page 3 of 5

at the site in order to characterize the ground water gradient flow. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for TPHg, TOG, BTEX, Chlorinated hydrocarbons (using Method 8010 or 8240), and heavy metals.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

Mr. Clifford Lee  
Re: 2951 High St.  
January 13, 1994  
Page 2 of 5

Petroleum Hydrocarbons as gasoline (TPHg) at 40 parts per million (ppm), Total Oil & Grease (TOG) at 120 ppm, and levels of chlorinated hydrocarbons, heavy metals, and benzene, toluene, ethylbenzene, and xylenes (BTEX) above detection limits. Consequently, further excavation of the tank pit was conducted on October 14 and 15, 1993. A total of five soil samples were collected from the pit, four from the sidewalls and one from the bottom. Levels of TPHg, BTEX, heavy metals, and tetrachloroethylene were detected above detection limits. Additionally, elevated concentrations of TOG were identified, primarily from the northeast wall of the pit at 3,700 ppm.

In addition to the above observed release, subsurface investigations conducted at the site by United Soil Engineering in March 1990 identified up to 620 ppm Total Petroleum Hydrocarbons from 5 feet below ground surface.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of both **soil and ground water** contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. It appears that, in the case of this site, the nearest UST site with monitoring wells is over 1,000 feet away. Therefore, three monitoring wells must be installed

Mr. Clifford Lee  
Re: 2951 High St.  
January 13, 1994  
Page 4 of 5

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

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

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

Lastly, you are required to submit documentation showing that the excavated soil was hauled off site to an appropriate disposal facility. **This documentation must be submitted within 15 days, or by January 27, 1994** of the date of this letter.

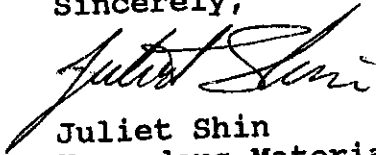
The State Water Resources Control Board has a Petroleum Underground Storage Tank Cleanup Fund available to sites to assist in investigations and cleanup. This office encourages you to look into applying to this fund. The address and phone number of the trust fund is:

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund Program  
2014 T Street, Ste 130  
P.O. Box 944212  
Sacramento, CA 94244-2120  
(916) 739-2475

Mr. Clifford Lee  
Re: 2951 High St.  
January 13, 1994  
Page 5 of 5

If you have any questions about the fund, you can contact Blessy Torres at (916) 227-4535. Any other questions can be directed to me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Noori Ameli  
Soil Tech Engineering, Inc.  
298 Brokaw Road  
Santa Clara, CA 95050

Mr. Mohammad Mashhoon  
2951 High St.  
Oakland, CA 94619

Gerald Lam  
1407 Webster St., Ste 216  
Oakland, CA 94612

John Warner  
21 Tamal Vista Blvd., Ste 196  
Corte Madera, CA 94925

Edgar Howell-File(JS)

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

August 12, 1993

Mr. Mohammad Mashhoon  
2951 High St.  
Oakland, CA 94619

STID 1038

Re: Waste Oil tank and other investigations at 2951 High St.,  
Oakland, California

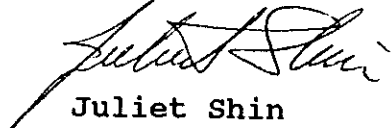
Dear Mr. Mashhoon,

It is the understanding of this office that there is an inactive waste oil tank located at the above site. According to our files, this waste oil tank has been inactive since 1990. **Per Alameda County Fire Code, Section 79.114(e)**, you are required to remove this tank within 90 days of not being in service. Consequently, you are required to have this waste oil tank removed from the site immediately. You are required to complete the attached Tank Closure Permit form and submit it to this office for review **within 30 days** of the date of this letter. Subsequent to the approval of this closure permit, you will be required to notify this office and the fire department at least one week before removing the tank, so that we can be out there to oversee the removal.

Additionally, this office has notified you on a number of occasions about your requirement to conduct further soil and ground water investigations at the site associated with the observed release in March 1990. Please be aware that you are still required to conduct the investigations outlined in the Notice of Violation letter, dated December 28, 1992, from this office.

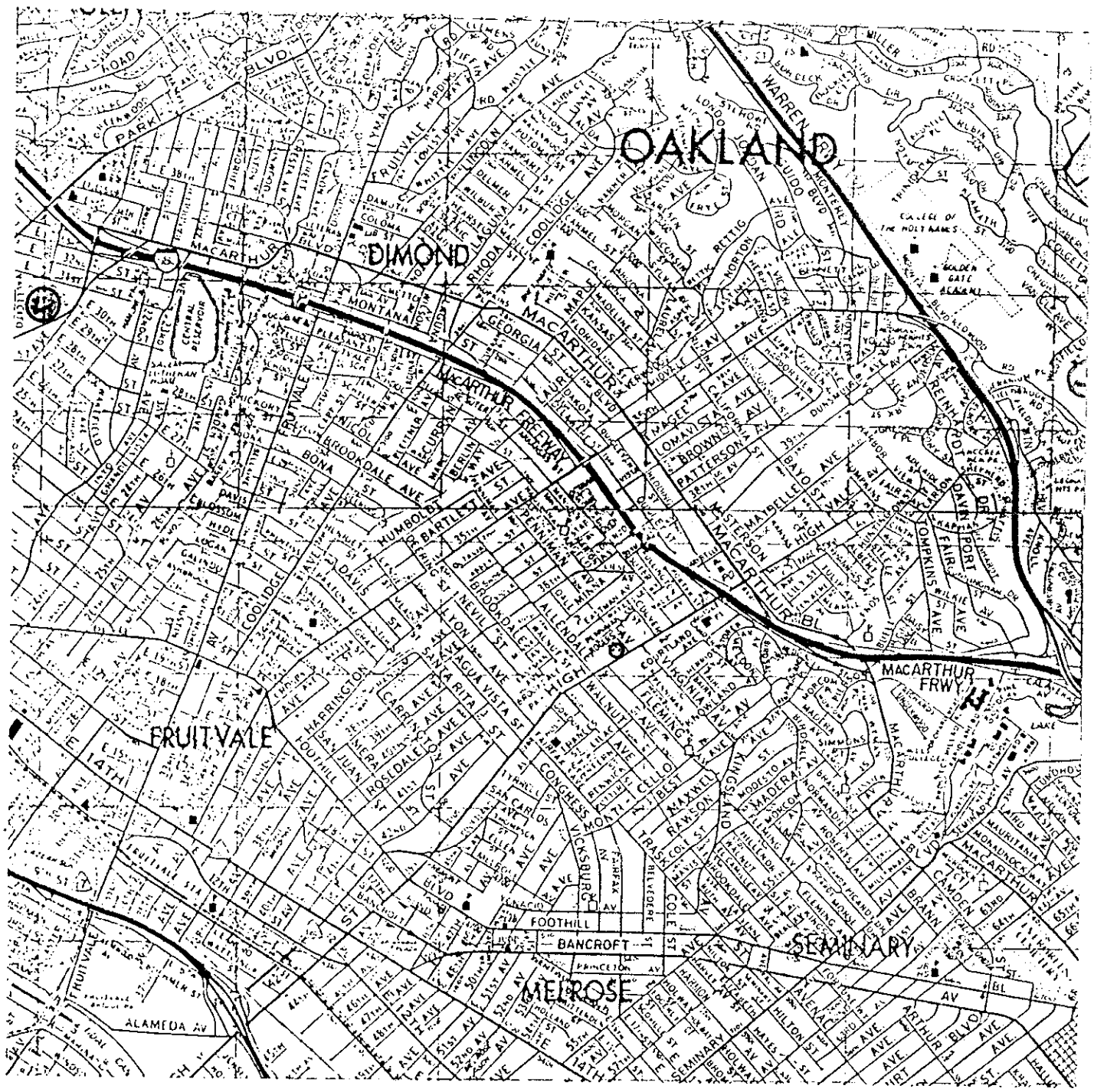
If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

  
Juliet Shin  
Hazardous Materials Specialist

cc: John Warner  
21 Tamal Vista Blvd. #196  
Corte Madera, CA 94925

Edgar Howell-File(JS)



2951 HIGH ST. OAKLAND 94619

JM

99 Montrose Avenue  
Daly City, Ca 94015  
June 15, 1993

Mr. Thomas Teacock  
County of Alameda  
Health Care Services Agency  
Hazardous Materials Division  
80 Swan Way  
Room 200  
Oakland, Ca 94621

ST 1038

Re: ARCO HIGH STREET  
2951 High Street  
Oakland, Ca

Dear Mr. Teacock:

I talked to you over the phone on June 8, 1993 about the ARCO HIGH STREET gasoline station. The owner of the business and property is Zima Center Inc. with Mohammed Mashhoon as president. Zima is now filing for Chapter 11 Bankruptcy and I am one of the creditors of Zima. It is believed that the station has some soil contamination. I asked you if it was the case that the County of Alameda Department of Environmental Health would not consent to a sale or transfer of ownership of the property until the soil contamination had been removed. You told me that your agency did not have that authority to block the sale or transfer of ownership for the reason of soil contamination, hence you would not do so. I would appreciate very much that you can send me a letter to confirm or correct the above information.

Please also send me all the soil contamination informations that you may have for the property.

Truly yours,

  
Charles Chung

Law Offices Of

# JOHN G. WARNER

21 Tamal Vista Blvd. #198  
Corte Madera, California 94925  
(415) 924-2640

FAX  
(415) 927-0608

### FACSIMILE COVER SHEET

PLEASE DELIVER THE FOLLOWING PAGES TO:

*City of Oakland*

NAME: *Juliet Shin*  
 FIRM NAME: *Hazardous Materials Supervisor*  
 FAX PHONE: *510-569-4757*  
 TOTAL PAGES: *2* INCLUDING COVER SHEET  
 DATE: *6-9-93*  
 TIME: \_\_\_\_\_  
 CLIENT NAME: *Fine Carder*

\*\* ANY QUESTIONS OR PROBLEMS WITH THIS TRANSMITTAL,  
PLEASE CALL THIS OFFICE AT (415) 924-2640 \*\*

Our facsimile number is: (415) 927-0608

- ORIGINAL WILL NOT FOLLOW
- ORIGINAL WILL FOLLOW BY:
  - U.S. MAIL, REGULAR
  - U.S. MAIL, CERTIFIED
  - FEDERAL EXPRESS
  - OTHER

COMMENTS:

*Attached as Tax Bankruptcy*  
*Information*

PLEASE DELIVER TO ADDRESSEE UPON RECEIPT

FAXSIMILE



Last known Address

Ngoin Tan → (791-6386)

3311 Beard Road

Fremont CA 94555

Bankruptcy Case

No. 91-41431 TR  
(Chapter 7)

LAW OFFICES OF  
JOHN G. WARNER

21 Tamal Vista Blvd. #196  
Corte Madera, California 94925  
(415) 924-2640

93 07 24 10 11  
Facsimile  
(415) 927-0608

April 2, 1993

Juliet Shin  
Hazardous Materials Supervisor  
Department of Environmental Health  
City of Oakland  
80 Swan Way, Room 200  
Oakland, CA 94621

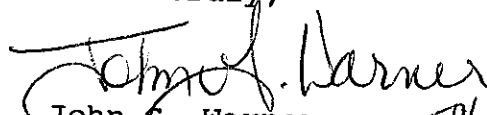
Re: Zima Center, Inc. (High Street Station)

Dear Ms. Shin:

Enclosed is a copy of Mohammad Mashhoon's deposition taken in the Atlantic Richfield case on December 10, 1992. Attached to his deposition as exhibits are copies of the photographs which we previously mentioned to you. Further, in his deposition Mr. Mashhoon describes the events and circumstances related to those photographs.

Please call us if you have any further questions.

Yours truly,

  
John G. Warner 7/1

JGW:th  
Enc.  
cc: Mohammad Mashhoon

Alameda County Health Care Services Agency  
 Department Of Environmental Health  
 Environmental Health Laboratory

Analytical Request

Sample Identification: 2 samples from Zima gas station, 2951 High street, Oakland, CA 94619  
 Certification# 1816  
 Laboratory # 94-052

Analyses Requested by: Brian Olivia  
 Date Collected: 6/13/94  
 Date Received: 6/13/94  
 Analysis requested: TPH gas

Collected by: Brian Olivia  
 Received by: Darcy

Background Information:

ALCO  
 HAZMAT  
 94 JUN 23 PM 3:32

Analytical Results

| Parameter             | Observation or Result |           |
|-----------------------|-----------------------|-----------|
| Sample Identification | 61394BP01             | 61394BP02 |
| Lab#                  | 94-068-1              | 94-068-2  |
| TPHgas, ppb(ug/kg)    | 1754ppb               | 2358ppb   |
|                       |                       |           |
|                       |                       |           |
|                       |                       |           |
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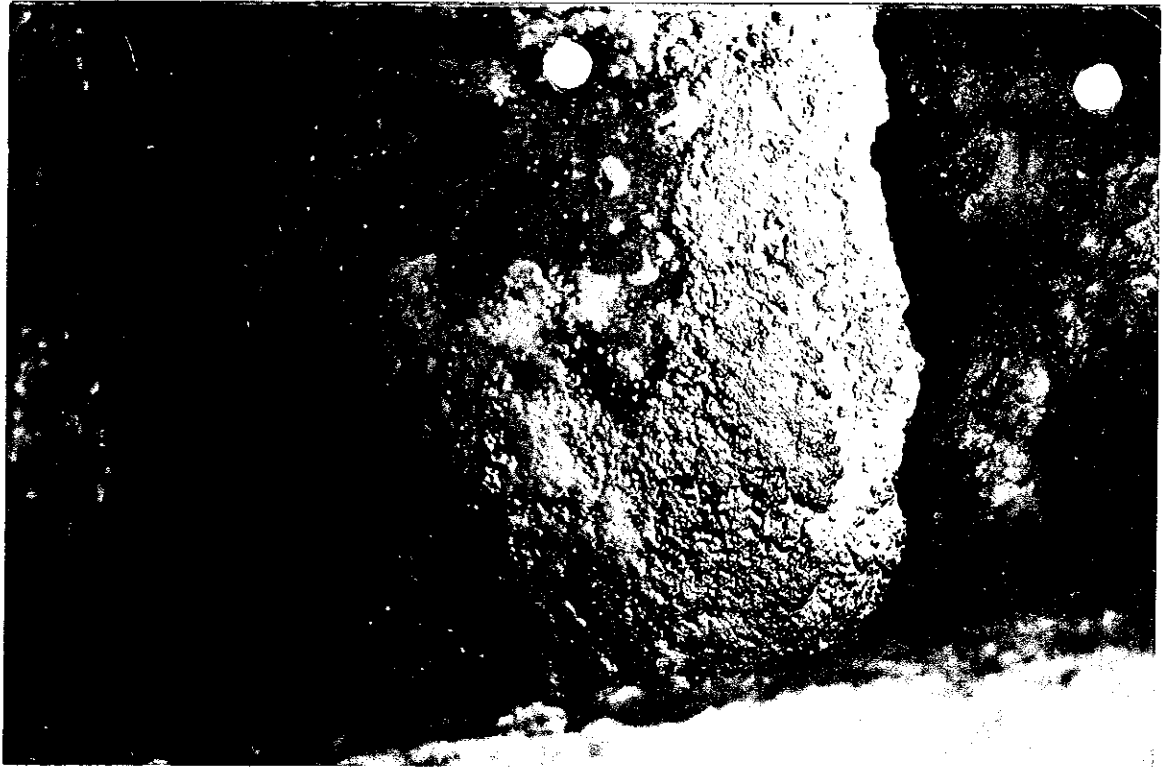
Conclusion:

Date Analyses Completed: 6/21/94

Chemist: Darcy

Approved: DW

Distribution: Brian Olivia, Ed Howell, R. Shahid.



LAW OFFICES OF  
**JOHN G. WARNER**

21 Tamal Vista Blvd. #196  
Corte Madera, California 94925  
(415) 924-2640

Facsimile  
(415) 927-0608

March 11, 1993

Juliet Shin  
Hazardous Materials Supervisor  
Department of Environmental Health  
City of Oakland  
80 Swan Way, Room 200  
Oakland, CA 94621

Re: Zima Center, Inc. (High Street Station)

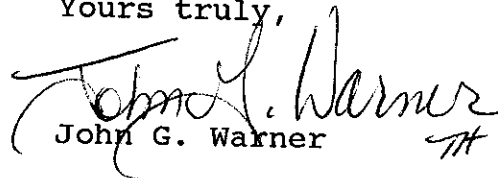
Dear Ms. Shin:

This confirms our telephone discussion several days ago regarding the status of the soil contamination at this High Street station.

Under separate cover, next week I will send to you copies of photographs and other materials which prove the involvement of Atlantic Richfield Company in this soil contamination.

In the meantime, if any developments occur which require my attention, please give me a call.

Yours truly,

  
John G. Warner

JGW:th  
cc: Mohammed Mashhoon



*Zima Center Corporation*

*5 Admiral Dr., #301*

*Emeryville, Ca. 94608*


*(415) 420-8444 or 420-8985*

Barbara Edminson  
2926 High St. Apt. # 101  
Oakland, California 94619  
January 19, 1993

Ms. Edminson,

This is the only legal notice you will receive from Zima C. Incorporated. We are notifying you that you do not have any legal right to harrass Zima C. Inc. and its employees.

If this type of behavior continues, we would have no alternative but to bring legal action against you.

  
-----  
Zima C. Inc.  
Mohammad A. Mashhoon  
2951 High St.  
Oakland, California 94619

c.c. John Warner - Attorney at Law  
c.c. City of Oakland  
c.c. News Media  
c.c. Environmental Health  
c.c. Oakland Police Department  
c.c. File

**STATE**  
COMPENSATION  
INSURANCE  
**FUND**

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

**CERTIFICATE OF WORKERS' COMPENSATION INSURANCE**

MARCH 4, 1993

POLICY NUMBER: 1324007-93  
CERTIFICATE EXPIRES: 01-01-94


┌  
CITY OF CAMPBELL  
ATTN: BLDG. DEPT.  
75 N. CENTRAL  
CAMPBELL, CA 95008

L  
This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

  
PRESIDENT

EMPLOYER

┌  
ALPHA GEO SERVICES, INC.  
298 BROKAW RD.  
SANTA CLARA, CA 95050



State of California  
CONTRACTORS STATE LICENSE BOARD



License Number

507570

Entity

CORP

Business Name

ALPHA GOLF SERVICE

Classification

Expiration Date

03/31/95



STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY CONTRACTORS STATE LICENSE BOARD

DEPARTMENT OF  
**Consumer  
Affairs**

*Building Quality*



## HAZARDOUS SUBSTANCES REMOVAL AND REMEDIAL ACTIONS CERTIFICATION

Pursuant to the provisions of Section 7058.7 of the Business and Professions Code, the Registrar of Contractors does hereby certify that the following qualifying person has successfully completed the hazardous substances removal and remedial actions examination.



Qualifier: FARHANG HAMEDI-FARD

License No.: 507520

Namestyle: ALPHA GEO SERVICES

WITNESS my hand and official seal this

14TH day of MARCH, 1990

*David R. Phillips*  
Registrar of Contractors

13L-36 (7/88)

This certification is the property of the Registrar of Contractors, is not transferable, and shall be returned to the Registrar upon demand when suspended, revoked, or invalidated for any reason.

A3391

**COMPLETION OF TRAINING**  
**OSHA - SARA**

**RICHARD MANLEY**

*Has Met The 8 Hr Refresher Training Requirement Under OSHA  
Standard, 29CFR1910.120 Hazardous Waste Operations And  
Emergency Response*



**ACKNOWLEDGEMENT**

*MIA Industries, Inc.*

**March 19, 1993**

**DATE**

**COMPLETION OF TRAINING**  
**OSHA - SARA**

**NOORODDIN AMELI**

*Has Met The 8 Hr Refresher Training Requirement Under OSHA  
Standard, 29CFR1910.120 Hazardous Waste Operations And  
Emergency Response*

  
**ACKNOWLEDGEMENT**

*MIA Industries, Inc.*

**March 19, 1993**

**DATE**

**COMPLETION OF TRAINING**  
**OSHA - SARA**

**AUGUSTINE MARTINEZ AQUILAR**

*Has Met The 40 Hr Initial Training Requirement Under OSHA  
Standard, 29CFR1910.120 Hazardous Waste Operations And  
Emergency Response*

*M. A. Aquilar*

**ACKNOWLEDGEMENT**

*MIA Industries, Inc.*

March 26, 1993

**DATE**

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
Acknowledgement of Refund Recipient for Site Account

DEPOSITOR FILLS OUT PER SITE

-- REQUIRED --

The depositor will use this form to acknowledge that the property owner or his or her designee will receive any refund due at the completion of all deposit/refund projects at the site listed below.

SITE NUMBER/ADDRESS:

REFUND RECIPIENT-PROPERTY OWNER

|                         |          |                       |           |
|-------------------------|----------|-----------------------|-----------|
| Site Number             |          | Alpha Geo Services    |           |
| High Street Gas Station |          | Owner's Name          |           |
| Company Name            |          | 298 Brokaw Road       |           |
| 2951 High Street        |          | Owner's Address       |           |
| Street Address          |          | Santa Clara, CA 95050 |           |
| Oakland, CA 94619       |          | Owner's City          | State Zip |
| City                    | Zip Code |                       |           |

I have read the description of the project Deposit/Refund Procedure, and have had an opportunity to ask questions about it. I understand that regardless of who deposits money into the site account, any deposit money remaining at the completion of all projects being conducted at this site will be refunded solely to the property owner or his or her designee.

N. A. K. G. 8/19/93  
Signature of Depositor Date

NOORI AMELI  
Depositor Name

Alpha Geo Services  
Company Name

298 Brokaw Road  
Street Address

Santa Clara, CA 95050  
City / Zip

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



EBA

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

December 28, 1992

Mahammed Mashhoon  
2951 High St.  
Oakland, CA 94619

STID 1038

RE: Required investigations at 2951 High St., Oakland,  
California

**NOTICE OF VIOLATION**

Dear Mr. Mashhoon,

According to a United Soil Engineering report, dated April 12, 1990, a subsurface investigation consisting of two exploratory borings was conducted on March 23, 1990 in response to signs of oil spillage on the property. Soil samples were collected from depths of 5 feet and 12 feet from the two borings. Analysis of these soil samples identified 620 ppm and 59 ppm petroleum hydrocarbons and 59 ppb benzene at 5 feet below ground surface. It appears that this contamination could be resulting from the underground storage tanks at the site.

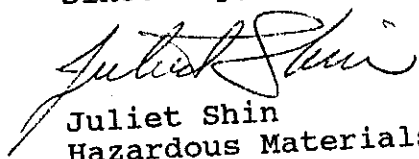
Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that investigations be conducted whenever an unauthorized release of product is suspected from an underground storage tank and associated piping. The observed soil contamination would indicate that such an event may have occurred.

In a letter dated October 30, 1992, this office requested that you submit a work plan addressing the delineation of the soil contamination observed at your site during a sampling effort in 1990. Additionally, we requested that you submit a well log and any additional well information for the on-site monitoring well, so that this office can determine whether this well can be used for the collection of ground water samples. To this date, this office has not received these requested materials. You are required to submit this information **within 30 days** of the date of this letter. Please be advised that this is a formal request for technical reports pursuant to **California Water Code Section 13267 (b)**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Mr. Mahammed Mashoon  
RE: 2951 High St.  
December 28, 1992  
Page 2 of 2

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Gil Jensen, Alameda County District Attorney's Office

Mark Thompson, Alameda County District Attorney's Office

Edgar Howell-File (JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



*[Handwritten initials]*

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

December 15, 1992

Mahammed Mashhoon  
5 Admiral Dr. #301  
Emeryville, CA 94608

STID 1038

RE: Required investigations at 2951 High St., Oakland,  
California

**NOTICE OF VIOLATION**

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According to a United Soil Engineering report, dated April 12, 1990, a subsurface investigation consisting of two exploratory borings was conducted on March 23, 1990 in response to signs of oil spillage on the property. Soil samples were collected from depths of 5 feet and 12 feet from the two borings. Analysis of these soil samples identified 620 ppm and 59 ppm petroleum hydrocarbons and 59 ppb benzene at 5 feet below ground surface. It appears that this contamination could be resulting from the underground storage tanks at the site.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that investigations be conducted whenever an unauthorized release of product is suspected from an underground storage tank and associated piping. The observed soil contamination would indicate that such an event may have occurred.

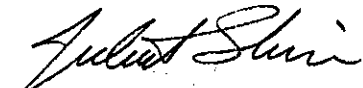
In a letter dated October 30, 1992, this office requested that you submit a work plan addressing the delineation of the soil contamination observed at your site during a sampling effort in 1990. Additionally, we requested that you submit a well log and any additional well information for the on-site monitoring well, so that this office can determine whether this well can be used for the collection of ground water samples. To this date, this office has not received these requested materials. You are required to submit this information **within 30 days** of the date of this letter. Please be advised that this is a formal request for technical reports pursuant to **California Water Code Section 13267 (b)**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.



Mr. Mahammed Mashoon  
RE: 2951 High St.  
December 15, 1992  
Page 2 of 2

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Gil Jensen, Alameda County District Attorney's Office

Mark Thompson, Alameda County District Attorney's Office

Edgar Howell-File (JS)

STEINHART & FALCONER

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS

333 MARKET STREET, THIRTY-SECOND FLOOR  
SAN FRANCISCO, CALIFORNIA 94105-2150  
(415) 777-3999

FACSIMILE (415) 442-0856  
FACSIMILE (415) 442-0839

December 9, 1992

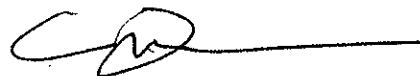
Mr. Roy Owcarz  
Alameda County Department of  
Environmental Health  
Hazardous Materials Division  
80 Swan Way, Suite 200  
Oakland, CA 94621

Re: File for 2951 High Street, Oakland 94619

Dear Mr. Owcarz:

This is a request to review the referenced file for tank tightness and inventory tests. I understand that your department charges \$71/hour to view the file and \$1/page for copying.

Very truly yours,



Eric L. Laurence

ELL/jdr

**Alameda County Department of Environmental Health  
Hazardous Materials Division**

80 Swan Way, Rm. 200, Oakland, CA 94621  
Ph: 510-271-4320

**BILLING FOR SERVICES**

STD# 1038

A. Site Name HIGH STREET ARCO Phone 436-4700

Site Address (If no address, description of area) 2951 High Street Oakland 94619  
Number Street City Zip

Prior Business Name — Prior Owner's Name —

B. Service Requestor Phillip Mark Redwood Empire Attorney Aids (707) 527-0353  
Contact Person Company Name Phone

Billing Address P.O. Box 1925 Santa Rosa 95402  
Number Street City Zip

| Category of Service                             |                    | #Hours     | Rate                | Total            |
|-------------------------------------------------|--------------------|------------|---------------------|------------------|
| <input checked="" type="checkbox"/> Site Search | (Whole Hours Only) | <u>2.0</u> | <u>\$ 71.00/Hr</u>  | <u>\$ 142</u>    |
| <input checked="" type="checkbox"/> File Search |                    | <u>5.0</u> | <u>\$ 1.00/Copy</u> | <u>\$ 5</u>      |
| <input type="checkbox"/> Other                  |                    | _____      | x \$ _____          | \$ <u>0</u>      |
| TOTAL CHARGE:                                   |                    |            |                     | <u>\$ 147.00</u> |

REMARKS: Aivkin, Radler + Kremer  
100 B Street, P.O. Box 14609  
Santa Rosa, CA 95402  
(707) 576-8033  
actually requested this site search

**You will receive an invoice in accordance with Article 11 of Chapter 6, Title 3 of the Ordinance Code of Alameda County**

Service Requestor Phillip Mark Phillip Mark Date 11-20-92  
printed name signature

HazMat Specialist Ron Owcarz Ron Owcarz Date 11/20/92  
printed name signature

RIVKIN, RADLER & KREMER

EAB PLAZA  
UNIONDALE, NY 11556-0111  
(516) 357-3000  
FAX: (516) 357-3333

100 B STREET, P. O. BOX 14609  
SANTA ROSA, CALIFORNIA 95402-6609  
(707) 576-8033  
TELECOPIER: (707) 576-7955

500 FRANKLIN VILLAGE DRIVE  
FRANKLIN, MA 02038-4001  
(508) 528-2100  
FAX: (508) 528-5875

30 NORTH LASALLE STREET  
CHICAGO, IL 60602-2507  
(312) 782-5680  
FAX: (312) 782-3112

TWO WILLIAM STREET  
WHITE PLAINS, NEW YORK 10601-1907  
(914) 683-6602  
FAX: (914) 684-0529

275 MADISON AVENUE  
NEW YORK, NY 10016-1101  
(212) 455-9555  
FAX: (212) 687-9044

WRITER'S DIRECT DIAL

November 4, 1992

Ron Owcarz  
Alameda County of Environmental Health  
Hazardous Material Division  
80 Swan Way Room 200  
Oakland, Ca. 94621

RE: Zima Center, Inc. v. Atlantic Richfield Company, et al  
RRK C/M# 405094-00018

Dear Mr. Ron Owcarz:

I am writing to let you know that Redwood Empire Attorney's Aids has our permission to copy the above-mentioned file. They will be contacting you to set up an appointment.

The site under which this file is kept is located at 2951 High Street, Oakland, Ca. 94619. The current owner is Zema Center, Inc. and the previous owner is Clifford Lee d/b/a/ Lee's Arco.

Please let me know if there is anything else I can do to assist you in this matter.

Very truly yours,

RIVKIN, RADLER & KREMER



Sharon Jean Brulé  
Legal Assistant

sjb/sb

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

October 30, 1992

Mahammed Mashhoon  
5 Admiral Dr. #301  
Emeryville, CA 94608

STID 1038

RE: Required investigations at 2951 High St., Oakland,  
California

Dear Mr. Mashhoon,

According to the Contamination Report, dated April 12, 1990, two soil borings were drilled at the site and soil samples were collected from five and 12 feet depths from each of these borings. Analysis of the soil samples collected from boring B-1 identified up to 620 ppm Total Petroleum Hydrocarbons as gasoline (TPHg) at a depth of five feet. Analysis of soil samples collected from boring B-2 identified up to 59 ppm TPHg and 1,100 ppm Oil and Grease also at a depth of five feet.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that investigations be conducted whenever an unauthorized release of product is suspected from an underground storage tank and associated piping. The observed soil contamination would indicate that such an event may have occurred.

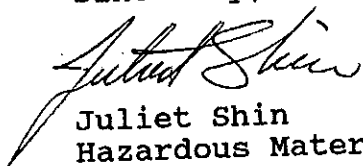
You are required to submit a work plan to this office addressing the determination of the extent of soil contamination at the site. Additionally, you must determine whether the ground water has been impacted by releases from the site. According to the Contamination Report, there is a well located adjacent to the underground storage tanks on site. Please submit the well log for this well. If this office determines this well to be adequately constructed for monitoring the upper aquifer at the site, you shall collect a ground water sample from the well and analyze it for all the waste oil constituents listed in Table 2 of RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

The work plan is due to this office **within 45 days** of the receipt of this letter. Please be advised that this is a formal request for technical reports pursuant to **California Water Code Section 13267(b)**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Mr. Mohammed Mashhoon  
RE: 2951 High Street  
October 30, 1992  
Page 2 of 2

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

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 # 1038 Site Name High Street Gas Co. Today's Date 10/22/92

### 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)

Site Address 2951 High Street

City Oakland Zip 94619 Phone 436-4700

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

### II.B ACUTELY HAZ. MATLS

- 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

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

### III. UNDERGROUND TANKS (Title 23)

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

#### Comments:

This facility has 5 vsts all single walled piping is reported to be double walled

(1) 6000 VL

(2) 4000 VL

(1) 6000 Sup unleaded

(1) 250 gal waste oil

- Annual storage inventory reconciliation form issued.

Pipeline leak det. tests are available dated 10/11/90 for 4 pipelines ~~but no~~ blueprints for the modification are available. Blue prints of the re-pipe dated 10/11/88 are available however no records of the locations of monitoring sensor probes or specifications or leak detection system are available. If possible please provide info regarding this matter.

- Need written monitoring plan item

- written spill prevention plan

- If sensor probe is not functional line leak detection tests are required. Please check to see if Recon Panel is functional at the time when the next tank integrity test is functional. performed need to submit HMMP revision

Contact: Mohammad Mashhoon

Title: owner

Signature: [Signature]

Inspector: Paul M. Smith

Signature: Paul M. Smith

II, III

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

1

Site ID# 1038 Site Name High Street Gas Company Today's Date 10/22/92

Site Address 2951 High st. EPA ID# \_\_\_\_\_

City Oakland Zip 94619 Phone 436-4700

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)

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

- Conlin. 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'n's
- 40. Name/ Covers 66545
  - 41. Recyclables 66800

Comments:

Underground storage tank inspection re:  
5 yr permit to operate

tank integrity tests are available for four of five tanks which are present at this facility. Tank integrity tests need to be updated on November 15, 1992.

Regarding the waste oil tank:

The waste oil tank has been capped off. you are required in addition to performing an annual tank integrity test to conduct daily inventory reconciliation on this tank. As you mentioned, if the waste oil tank is not being used it should be removed. you are required to either properly annual test & monitor this tank or remove it.

need to re-submit ust tank applications 1 Form A and 5 Form B's

inventory reconciliation records are not available onsite. Mr Mashoon will make an appt to meet with Ron Owe to inspect the records in our office within 2 weeks

Rev 6/88

Contact: Mohammad Mashoon

Title: owner

Signature: [Signature]

Inspector: Paul Smith

Signature: \_\_\_\_\_



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Went out  
10.9.92  
Returned  
10.19.92

92 05719

HAFLA, SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

went out  
again  
10-20-92

October 09, 1992

ATTN: Mahammed Mashhoon

Mohammed Mashhoon  
5 Admiral Dr. #301  
Emeryville, Ca 94608

RE: Project # 313A - I  
> at 2951 High St. in Oakland 94619

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 \$300.00, 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 Ron Owcarz at (510) 271-4320.

Sincerely,

  
Edgar B. Nowell III, Chief  
Hazardous Materials Division

c: files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

October 09, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

ATTN: Mahammed Mashhoon

Mahammed Mashhoon  
5 Admiral Dr. #301  
Emeryville, Ca 94608

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at 2951 High St. in Oakland 94619

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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 Ron Owcarz at (510) 271-4320.

Sincerely,

  
Edgar B. Powell III, Chief  
Hazardous Materials Division

c: files

October 5, 1992

92 OCT -5 11:18

Mr. Ron Owcarz  
Inspector  
County of Alameda  
Hazardous Materials Division  
80 Swan Way, Room 200  
Oakland, CA 94621

**Re: Existing Underground Storage Tanks at: 2925 High Street**

Dear Mr. Owcarz:

I am writing you about the gasoline storage tanks at a gas station in our neighborhood. This gas station is located at the corner of High Street and Penniman Avenue. I am concerned about these tanks and would appreciate your attention to this matter.

I would like to verify that the anti-contamination laws and monitoring procedures of Alameda County are being followed at this property. Is this property owner required to post his tank monitoring records in public view on site?

Thank you for keeping me advised. I am interested in learning the required monitoring procedures and whether this property owner is complying with the Alameda County laws.

Sincerely,



Suzanne Outten  
4339 Fleming Avenue  
Oakland, CA 94619

cc: MacArthur Coalition, planning and zoning committee  
High Street Neighborhood Coalition, zoning task force  
NURPMAHS (Neighbors United for Responsible Property Management  
Along High Street)

2925 High

DATE: 3-5-92

TO : Local Oversight Program

FROM: Erachw

SUBJ: Transfer of Eligible Oversight Case

Site name: High St. Arco

Address: 2951 High St. city Oak zip 94619

Closure plan attached?  <sup>But not approved</sup>  DepRef remaining \$ ~~9429~~ 24.

DepRef Project #: 313 STID #(if any) (1038) U.O.P.

Number of Tanks: 0 removed? Y  N  Date of removal NA

Leak Report filed?  Y  N Date of Discovery 4-12-90

Samples received?  Y  N Contamination: Soil

Petroleum  Y  N Types: Avgas Jet leaded unleaded Diesel fuel, oil waste oil kerosene solvents

Monitoring wells on site ~~no~~ <sup>1</sup> Yes Monitoring schedule? Y N

Briefly describe the following:

Preliminary Assessment USE Report dated 4/12/90

Remedial Action 1 MW installed without our knowledge or approval

Post Remedial Action Monitoring ?

Enforcement Action need to submit work plan

Comments: Soil sample was taken for property transfer on 4-12-90  
Soil samples show contamination levels at: 620 ppm TPH(g); 120 ppm TPH(d)  
TOG at Boing 2 shows 1,100 ppm.

Operators were told to install MW and add'l. soil samples to determine extent of contamination. No reports have been sent to this office. No work plan has been submitted

July 15, 1991

Alameda County Department of Environmental Health  
80 Swan Way  
Oakland, California 94621

Attention: Mr. Rafat Shahid

**ARCO Products Company Facilities in Alameda County - RWQCB Fuel Leaks List**

Dear Mr. Shahid

Please find attached, Quarterly Summary Reports (QSRs) for ARCO Products Company Service Stations in Alameda County. The QSRs summarize activities conducted by ARCO at the respective sites during the second quarter of 1991; also included are projected site activities for the third quarter of 1991 and a bibliography of reports submitted for each location.

The QSRs are classified by address within the County. We are submitting this document and attached QSRs as agreed in our recent meeting with the RWQCB. Please note that we are forwarding copies of the QSRs to the RWQCB as well.

ARCO Products Company has reviewed the Regional Water Quality Control Board's (RWQCB) February 19, 1991 printout of ARCO fuel leak sites in the San Francisco Bay Area. We have evaluated each site with respect to ARCO's responsibility for investigation, monitoring, and/or remediation. It is ARCO's belief that several of the sites originally attributed to ARCO are actually the responsibility of other parties. We have therefore prepared QSRs and a brief discussion regarding those sites which we believe should either be removed from ARCO responsibility or be considered for closure.

ARCO is planning a subsequent comprehensive QSR submittal for ARCO sites on October 15, 1991. Please do not hesitate to contact us with any questions regarding this submittal.

Sincerely,



*for* Kyle A. Christie  
Environmental Engineer

Attachments:

Non-ARCO Facility/Site Closure Discussion and QSRs  
ARCO Facility QSRs

**NON-ARCO FACILITY/SITE CLOSURE DISCUSSION AND QSRS**

**Alameda County**

### Alameda County Sites

Two ARCO facilities including Station Numbers 4977 and 6002 (located at 2770 Castro Valley Road, Castro Valley and 6235 Seminary Avenue, Oakland) experienced vapor/vent line failure during UST system precision testing. In accordance with State Water Resources Control Board (SWRCB) letter LG-43, ARCO requests that these facilities be removed from the RWQCB fuel leaks list.

A small volume of hydrocarbons were released from ARCO Station Number 498 located at 286 South Livermore Avenue, Livermore. The product was released to an on-site secondary containment trench and was subsequently removed; no product was released to the soil or groundwater. Alameda County issued a letter to ARCO on May 24, 1991 stating that no further action is necessary at this site.

A total of seven Alameda County ARCO facilities listed by the RWQCB were not ARCO-owned at the time of the release discovery and/or report. These sites include Station Numbers 188, 329, and 623 (respectively located at 4191 First Street, Pleasanton, 2032 12th Street, Oakland, and 2110 Mountain, Oakland) and facilities located at 2951 High Street, 4401 Market Street, 2844 Mountain Boulevard, and 2740 98th Street, Oakland.

ARCO has prepared QSRs for each of these facilities; however, we request that the cases be omitted from the leaks list or be referred to the actual responsible party, as appropriate. The ownership information for the individual sites is included on the attached QSRs.

Finally, the RWQCB February 19, 1991 printout lists two sites which are actually the same. The facility listed as 71 MacArthur Boulevard is actually ARCO Service Station Number 4931 located at 731 West MacArthur Boulevard in Oakland.

Attachment:

Non-ARCO Facility QSRs

UST LEAK      Date of Last  
SITE UPDATE    Review/Update \_\_\_\_\_

Current  
Date    July 15, 1991

**SITE IDENTIFICATION**

Name      ARCO STATION      Case No. Site \_\_\_\_\_  
Address    2951 High Street  
            Street Number                  Street  
            Oakland, CA  
            City                                  Zip Code  
            Alameda County                  Substance Low/medium  
                                                                         hydrocarbons - oil and grease  
County  
Local Agency      Alameda County Environmental Health Department  
Regional Board    San Francisco Bay Region

LEAD STAFF PERSON      Unknown

**CASE TYPE**

\_\_\_\_\_ Undetermined      \_\_\_\_\_ Soil Only      \_\_\_\_\_ Ground Water      \_\_\_\_\_ Drinking Water

**STATUS (Date indicates when case moved into status)**

|       |                                                |      |       |
|-------|------------------------------------------------|------|-------|
| _____ | No Action Taken                                | Date | _____ |
| _____ | Leak Being Confirmed                           | Date | _____ |
| _____ | Preliminary Site Assessment Workplan Submitted | Date | _____ |
| _____ | Preliminary Site Assessment Underway           | Date | _____ |
| _____ | Pollution Characterization                     | Date | _____ |
| _____ | Remediation Plan                               | Date | _____ |
| _____ | Remedial Action Underway                       | Date | _____ |
| _____ | Post Remedial Action Monitoring                | Date | _____ |
| _____ | Case Referred to Regional Board                | Date | _____ |
| _____ | Case Referred to Dept. of Health Services      | Date | _____ |
| _____ | Case Closed                                    | Date | _____ |

**REMEDIAL ACTION**

**COMMENTS**

The current operators and business owners are Mohamad Haskhin and Amir Zarrekparuar. Zima Center purchased property 9-21-88 prior to date of leak (5-298-89). ARCO has never owned this site and we therefore request that ARCO be removed as the responsible party for this site. The County tax assessor records indicate that Zima Center Inc. owned the site at the time of the leak discovery.

Name \_\_\_\_\_  
Contact \_\_\_\_\_ Phone ( ) \_\_\_\_\_  
Address \_\_\_\_\_  
            Street Number                  Street  
            City                                  State                  Zip Code



H.M.M.P. has not been updated after installation of new tanks.

H/S 25505  
H/S 25514(a)

✓ 2951 High St., Oakland (site status as of 3/26/91)

(Question: Has Arco ever had an ownership interest in this site?)

No H.M.M.P. has been filed.

H/S 25505  
H/S 25514(a)

Quarterly inventory reports have not been submitted.

T.23-2644  
H/S 25299.3  
H/S 25299

A 4/12/90 environmental consultant's report indicated 2 soil borings. At 5 feet: 620 ppm gasoline, 120 ppm diesel, 1,100 ppm oil and grease. The leak report wasn't filed until 5/25/90.

H/S 25295(a)  
H/S 25299(a)(4)  
H/S 25299(b)(4)  
H/S 25299(b)

County HazMat advised Arco by letter dated 9/19/90 that workplan to investigate contamination must be submitted. To 3/26/91, no workplan has been submitted. Failure to remediate.

H/S 25189(d)

This site has 4 gasoline tanks and 1 waste oil tank. Only 1 precision test on file. ~~That test dated~~ (October 1990) and only the gasoline tanks were tested.

*Waste oil tank has never been  
precision-tested.*

H/S 25293  
H/S 25299(b)(4)  
H/S 25299(b)

This site was recently inspected on 2/27/91 and 3/13/91.  
Violations include:

Daily inventory records not maintained on site.

T.23 - 2712  
H/S 25299.3  
H/S 25299

The tanks aren't being monitored. (No quarterlies, no dailies, inadequate precision testing, no written monitoring plan maintained on site.)

H/S 25292(a)  
H/S 25299(a)(2)  
H/S 25299(b)(4)  
H/S 25299(b)

Although this site is a generator, records documenting proper disposal of hazardous waste were not available for review.

T.22 - 66492  
H/S 25189(b)

A drum labeled as containing hazardous waste was observed to have an accumulation date of 10/25/90. Storage over 90 days. (Note: the drum was unsecured.)

T.22 - 66508  
H/S 25189(b)

(Note: The waste oil tank is filled with old gas. As it makes no sense to put "good" gas in the waste oil tank, we suspect the gas is contaminated in some fashion.)

6407 Telegraph Ave., Oakland (site status as of 3/29/91)

In June, 1988, 3 new tanks installed and 4 old tanks removed.

No "as-builts" on file for new tanks.

T.23 - 2635(c)(8)  
H/S 25299.3  
H/S 25299

Routine monitoring plan and contingency plan for release not submitted for new tanks.

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

- 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. MATLS**
- \_\_\_ 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 groundwater
    - One time sols
  - 3) Daily Vadose
    - One time sols
    - Annual tank test
  - 4) Monthly Gndwater
    - One time sols
  - 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 testing
  - 8) Annual Tank Testing
    - Daily inventory
  - 9) Other

- \_\_\_ 7. Precs Tank Test
  - Date: not available
- \_\_\_ 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 2711
    - Date: \_\_\_\_\_
  - \_\_\_ 14. As Built 2635
    - Date: \_\_\_\_\_

Site ID # \_\_\_\_\_ Site Name Juma Hussein (manager) Today's Date 3/27/91

Site Address 2951 High St  
 City Oakland Zip 94619 Phone 201-1111

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

Asses. by \_\_\_\_\_  
Zuma Center Inc  
5 Admiral Dr 301  
Emeryville,  
94608

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

**Comments:**

Reg 6000 gal single walled VST  
 2 unlined tanks must be connected holding 7974 gallons  
 possible waste oil tank on east side of property  
 no tank integrity test available - Mr Hussein will  
 work with the station owner of tank Zuma Center Inc  
 and property owner is Mac Mashoun 531-0707  
 An inventory reconciliation is being conducted at this  
 facility. I informed Mr Hussein of the necessity of  
 conducting this process & discussed the procedure  
 no quarterly reporting is being conducted. I informed  
 Mr Hussein of this requirement.  
 I scheduled an appointment w Juma Hussein  
 wed 3/13/91 to follow up on the above at 4:00 pm  
 5 gallon drum labelled hazardous dated 10/25/90  
 unsecured

Contact: Juma Hussein  
 Title: manager  
 Signature: \_\_\_\_\_

Inspector: Paul Smith  
 Signature: Paul M. Smith

II, III

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 High Street Arco  
 ID # \_\_\_\_\_ Name Mohamed Mashoon Today's Date 3/13/91

Site Address 7951 High Street

City Oakland Zip 94 Phone 531-0600

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
- 2844 Mountain Blvd  
Oakland  
94602

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

**Comments:**

Site visit by Mr. Mashoon re: UST permit requirements for the above

Tank tightness test for 4 UST's on file dated 7/31/90. <sup>(\*)</sup> <sub>Need tank test for the 5th UST</sub>

5 UST's onsite - Mr. Mashoon reported to me that he will be taking over the business within 1 week time. It is later than that date 3/20/91 you are requested to notify our office.

The following requirements are necessary in accordance with Title 23 of the CA Code of Regulations

- 1) - Daily inventory reconciliation
- 2) - written documentation of the above
- 3) - written monitoring plan
- 4) - Quarterly Reporting to this office (listing disposition of 5 gal)
- 5) - submit revised business plan (copy provided)
- 6) - empty the 5th UST which is not being used.

It appears as if this tank is full of gasoline. Please provide this office with a copy of the manifest or pickup slip for tank contents removal.

You are also required to properly dispose of the 55 gal drum in the back of the property labelled hazardous waste.

I provide our office with a copy of the disposal documentation. II, III

**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. MATLS**

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OnSite 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
- 6. Method
- 1) Monthly Test
- 2) Daily Vadose
- Semi-annual groundwater
- One time soils
- 3) Daily Vadose
- One time soils
- Annual tank test
- 4) Monthly Groundwater
- One time soils
- 5) Daily Inventory
- Annual tank testing
- Cont pipe leak det
- Vadose/groundwater mon.
- 6) Daily Inventory
- Annual tank testing
- Cont pipe leak det
- 7) Weekly Tank Gauge
- Annual tank testing
- 8) Annual Tank Testing (form provided)
- Daily Inventory
- 9) Other \_\_\_\_\_
- 7. Precs Tank Test 2643
- Date: \_\_\_\_\_
- 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 2711
- Date: \_\_\_\_\_
- 14. As Built 2635
- Date: \_\_\_\_\_

Rev 8/88

Contact: Mr. Mohamed Mashoon

Title: property owner

Signature: \_\_\_\_\_

Inspector: Paul Smith

Signature: Paul M. Smith

Site Brief for UNDERGROUND TANKS  
for the City of Alamedaas of 12/28/90  
pg 1

| UTID/<br>Status<br>BillID   | Name of Site<br>=====       | Site Address<br>=====                                 | #Tanks       | PERMITS:<br>=====               |
|-----------------------------|-----------------------------|-------------------------------------------------------|--------------|---------------------------------|
| -0-<br>T61043               | C Arco Station #02112       | 1260 Park St.<br>Alameda , CA 94501                   | 5            | I:09/06/88<br>F:-0-             |
| 784<br>T61043               | C Arco Station #02035       | 1001 San Pablo Ave.<br>Albany , CA 94706              | 4            | I:09/06/88<br>F:-0-             |
| 658<br>T61043               | C Arco Station #04977 AM/PM | 2770 Castro Valley Blvd.<br>Castro Valley , CA 94546  | 3            | I:09/06/88<br>F:07/05/88        |
| -0-<br>T61043               | C Arco Station #02152       | 22141 Center St.<br>Castro Valley , CA 94546          | 3            | I:09/06/88<br>F:-0-             |
| *1053<br>T61043             | C Arco Station #06041       | 7249 Village Pkwy.<br>Dublin , CA 94568               | 4            | I:09/06/88<br>F:-0-             |
| *813<br>T10115              | C Arco K&V Gas Foodmart     | 6211 San Pablo Ave.<br>Emeryville , CA 94608          | 3            | I:-0-<br>F:-0-                  |
| I *<br>T61043               | C Arco Station #05387       | 20200 Hesperian Blvd.<br>Hayward , CA 94541           | 4            | I:09/06/88<br>F:-0-             |
| *-0-<br>T21120              | C Airport Arco              | 20450 Hesperian Blvd.<br>Hayward , CA 94541           | 3            | I:02/03/89<br>F:-0-             |
| * <del>2112</del><br>T42311 | C Springtown Arco           | 909 Bluebell Dr.<br>Livermore , CA 94550              | 3            | I:-0-<br>F:-0-                  |
| -0-<br>T61043               | C Arco Station #00771       | 899 Rincon Ave.<br>Livermore , CA 94550               | 5            | I:09/06/88<br>F:-0-             |
| 198<br>T61026               | R Wong's Arco               | 2032 E. - 12th St.<br>Oakland , CA 94606              | 0            | I:-0-<br>F:-0-                  |
| *-0-<br>T61043              | C Arco Station #02185       | 9800 E. - 14th St.<br>Oakland , CA 94603              | 4            | I:09/06/88<br>F:-0-             |
| 1130<br>TA1036              | C Freeway Arco              | 2740 - 98th Ave.<br>Oakland , CA 94605                | 4            | I:10/13/87<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #02169       | 889 W. Grand Ave.<br>Oakland , CA 94607               | 5            | I:09/06/88<br>F:-0-             |
| *-0-<br>-0-                 | R Gin's Arco Service        | 706 Harrison St.<br>Oakland , CA 94612                | 0            | I:-0-<br>F:-0-                  |
| -0-<br>T61043               | C Arco Station #04494       | 566 Hegenberger Rd.<br>Oakland , CA 94621             | 3            | I:02/05/88<br>F:-0-             |
| *1038<br>T21043             | C High St. Arco             | 2951 High St.<br>Oakland , CA 94619                   | 5            | I:02/05/88<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #04931       | 731 W. MacArthur Blvd.<br>Oakland , CA 94609          | 4            | I:09/06/88<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #00276       | 10600 MacArthur Blvd.<br>Oakland , CA 94605           | 3            | I:09/06/88<br>F:-0-             |
| 851<br>T41043               | C Mountain Blvd. Arco       | 2844 Mountain Blvd.<br>Oakland , CA 94602             | 4            | I:04/14/88<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #02107       | 3310 Park Blvd.<br>Oakland , CA 94610                 | 3            | I:09/06/88<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #06002       | 6235 Seminary Ave.<br>Oakland , CA 94605              | 4            | I:09/06/88<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #06148       | 5131 Shattuck Ave.<br>Oakland , CA 94609              | 3            | I:09/06/88<br>F:-0-             |
| -0-<br>T61043               | C Arco Station #00374       | 6407 Telegraph Ave.<br>Oakland , CA 94609             | 3            | I:09/06/88<br>F:-0-             |
| ? -0-<br>-0-                | F Freedom Arco              | 15101 Freedom Ave.<br>San Leandro , CA 94578          | 3            | I:-0-<br>F:-0-                  |
| <del>1794</del><br>T81053   | <del>C Pharco</del>         | <del>2222 Grant Ave.<br/>San Lorenzo , CA 94580</del> | <del>1</del> | <del>I:08/16/88<br/>F:-0-</del> |
| 779<br>T61043               | C Arco Station #00608       | 17601 Hesperian Blvd.<br>San Lorenzo , CA 94580       | 4            | I:09/06/88<br>F:-0-             |

Site Brief for A B - 2 1 8 5  
for the city of Alameda

printed: 12/28/90  
page: 1

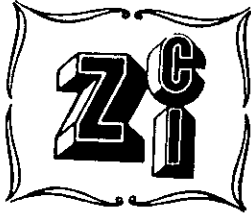
| ABID/BillID<br>====/===== | Name of Site<br>=====     | Site Address<br>=====      | Zip SysEntry S<br>==== ===== = |
|---------------------------|---------------------------|----------------------------|--------------------------------|
| /L71107                   | Arco Station #02112       | 1260 Park St.              | 501 10/24/90 C                 |
| /L91227                   | Arco Station #02035       | 1001 San Pablo Ave.        | 706 08/14/89 C                 |
| 658/HL7111                | Arco Station #04977       | 2770 Castro Valley Blvd.   | 546 08/14/89 C                 |
| /HL7112                   | Arco Station #02152       | 22141 Center St.           | 546 08/14/89 C                 |
| 1053/HL7114               | Arco Station #06041       | 7249 Village Pkwy.         | 568 06/04/90 C                 |
| /LC1217                   | Arco Station #05387       | 20200 Hesperian Blvd.      | 541 06/04/90 C                 |
| /L22223                   | Airport Arco              | 20450 Hesperian Blvd.      | 541 08/01/89 C                 |
| /                         | Springtown Arco           | 909 Bluebell St.           | 550 P                          |
| /L41112                   | Arco Station #00771       | 899 Rincon Ave.            | 550 07/28/89 C                 |
| /L81123                   | Arco Station #02185       | 9800 E. - 14th St.         | 603 08/14/89 C                 |
| 1130/L91386               | Freeway Arco              | 2740 - 98th Ave.           | 608 09/18/89 C                 |
| /L81146                   | Arco Station #02169       | 889 W. Grand Ave.          | 607 08/14/89 C                 |
| /L81176                   | Arco Station #04494       | 566 Hegenberger Rd.        | 621 08/14/89 C                 |
| 1038/                     | High St. Arco             | 2951 High St.              | 619 03/21/89 P                 |
| /L81178                   | Arco Station #04931       | 731 W. MacArthur Blvd.     | 609 06/04/90 C                 |
| /L81128                   | Arco Station #00276       | 10600 MacArthur Blvd.      | 605 11/20/89 C                 |
| 851/L12017                | Mountain Blvd. Arco Servi | 2844 Mountain Blvd.        | 602 11/30/90 M                 |
| /L81188                   | Arco Station #02107       | 3310 Park Blvd.            | 610 08/14/89 C                 |
| /L81295                   | Sunshine Petroleum, Inc.  | 6211 San Pablo Ave.        | 608 12/28/90 M                 |
| /HL8112                   | Arco Station #06002       | 6235 Seminary Ave.         | 605 08/31/90 C                 |
| /L81130                   | Arco Station #06148       | 5131 Shattuck Ave.         | 609 06/04/90 C                 |
| /L81179                   | Arco Station #00374       | 6407 Telegraph Ave.        | 609 08/14/89 C                 |
| 744/HL7116                | Arco Station #02111       | 1156 Davis St.             | 577 08/14/89 C                 |
| /HL7118                   | Arco Station #00601       | 712 Lewelling Blvd.        | 579 08/14/89 C                 |
| <del>1794/LA1469</del>    | <del>Tharce</del>         | <del>2222 Grant Ave.</del> | <del>580 07/28/89 C</del>      |
| 779/HL7119                | Arco Station #00608       | 17601 Hesperian Blvd.      | 580 08/14/89 C                 |

Arco Stati

Report Total : 26

Status Codes: C=Current/Part2      M=Current/Part1      P=awaiting busPla  
 B=ready for Billing      A=ready for Billing      I=Inactive

*6211 San Pablo  
No 1167 MP.*



Zima Center Corporation

5 Admiral Dr., #301  
Emeryville, Ca. 94608

(415) 420-8444 or 420-8985

Department of Environmental Health  
Hazardous Materials Program  
80 Swan Way, Room 200  
Oakland, CA 94621

Oct. 12, 1990

Attention: Cynthia Chapman

Re: 2951 High Street,  
Oakland

Dear Ms. Chapman,

We thank you for your letter of September 18, 1990, and with reference to our subsequent discussions we like to provide you with the following information:

- 1- A copy of the last line leak detection test as well as the summaries of last three quarters of inventory reconciliation are enclosed
- 2- The installation of a monitoring well is not warranted because:

a) The soil test does not indicate major or considerable contamination below 5 feet;

b) This station had a complete overhaul of pumps and lines less than three years ago, observing the latest codes ( a copy of the contract for this major work is also enclosed) whereby fiberglass lines, with double line for safety, and a leak detector device were installed, all approved and inspected by city authorities, and all tanks and lines have been maintained in the best possible manner.

We therefore appreciate it very much if you may please give us the sign-off document.

Truly Yours

  
Mohammad Ali Mashhoon  
President

10/12/90

*2 I thought samples collected from 12 to 14'*

ALAMEDA COUNTY  
HEALTH CARE SERVICE

AGENCY  
DAVID J. KEARS, Agency Director



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

September 18, 1990

Mr. Mohammed Mashhoon  
5 Admiral Drive #301  
Emeryville, CA 94608

RE: 2951 High Street, Oakland

Dear Mr. Mashhoon:

This letter is in reference to our conversation of September 11, 1990, concerning the above address. You requested that we send a letter indicating that there wasn't a problem at this address. Based on our information, the site has been impacted by petroleum hydrocarbons. Until a site investigation has been performed, this office will not issue a sign-off letter.

A report titled, "Contamination Investigation for 2951 High Street, Arco Station Oakland, California" prepared by United Soil Engineering, was submitted to our office for review. The report states that two borings were taken, and two samples were taken from each boring at the 5-foot and 12-foot intervals. Analyses indicate that Soil Sample 1-1, taken at 5 feet from the first boring, has 620 ppm TPH as Low/Medium Hydrocarbons, and 120 ppm TPH as High Boiling Point Hydrocarbons, 1.9 ppm Benzene, 13 ppm Toluene, 10 ppm Ethyl Benzene, and 66 ppm Xylene. Soil Sample 2-1 from Boring 2 had 59 ppm TPH and 1,100 ppm Oil and Grease. The samples taken at 12 feet contained small amounts of BTEX, and were at non-detect levels for TPH.

On June 8, 1990, your consultant, Mr. Mohsen H. Barazi, of JEDCO Consulting Engineers, met with Senior Hazardous Materials Specialist Ariu Levi to determine what the next activities would be required by this office, based on this report. Mr. Levi stated that he wanted:

- 1) A copy of the last tank test
- 2) A copy of the last line leak detection test
- 3) The summaries of last three quarters of inventory reconciliation
- 4) Any information on an installed monitoring well, which was indicated in the report

Mr. Levi also stated that monitoring wells would be necessary to determine if the groundwater has been impacted. Mr. Barazi submitted an Underground Storage Tank Unauthorized Release/Contamination Site Report for the site. Copies of this have been sent to the San Francisco Bay Regional Water Quality Control Board, and to you.



September 18, 1990  
2951 High Street  
Page 2 of 2

To date, we have only received the tank test results, performed July 31, 1990. We have not received any other information that was requested, and apparently no monitoring well(s) was installed.

You are required to perform additional work at the site to determine the extent of the contamination in the soil, and to determine if groundwater has been impacted. Before any work begins, you must submit a work plan to this office, which describes the activities that will be performed. Once the extent of contamination is defined, you need to determine how you will remediate the contamination.

Site sign-off will happen only after remediation has occurred to the satisfaction of Alameda County and the RWQCB.

If you have any questions, please call the undersigned at 415/271-4320.

Sincerely,

*Cynthia Chapman*

Cynthia Chapman  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection  
Steven LuQuire, RWQCB  
George Brewster  
Al Eshom

# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

90 MAY 25 PM 2:47

EMERGENCY  YES  NO  
 HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED?  YES  NO

FOR LOCAL AGENCY USE ONLY  
 I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE.

REPORT DATE: 05/25/90  
 CASE #

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

REPORTED BY: MOHSEN AL-BARAZI  
 REPRESENTING:  OWNER/OPERATOR  REGIONAL BOARD  
 LOCAL AGENCY  OTHER

PHONE: (415) 649-0241  
 SIGNATURE: Mohsen Al Barazi  
 COMPANY OR AGENCY NAME: JEDCO Consulting Engineers

ADDRESS: 930 Dwight Way STREET  
 CITY: Berkeley STATE: CA ZIP: 94710

CONTACT PERSON: Richard Wilson  
 PHONE: (415) 935-3806

RESponsible PARTY: Haber Oil Products  
 ADDRESS: 220 Hookston Road  
 CITY: Pleasant Hill STATE: CA ZIP: 94523

OPERATOR: \_\_\_\_\_ PHONE: (415) 261-1111

SITE LOCATION: ARCO  
 ADDRESS: 2951 High STREET  
 CITY: Oakland COUNTY: Alameda ZIP: 94619  
 CROSS STREET: Peniman St.

IMPLEMENTING AGENCIES:  
 LOCAL AGENCY: Alameda County Health Care Services  
 AGENCY NAME: Hazardous Material Program  
 CONTACT PERSON: MR. Ariu Levi / MR. Larry Cito  
 PHONE: (415) 271-4320  
 REGIONAL BOARD: San Francisco Bay  
 CONTACT PERSON: MR. Richard Hiatt  
 PHONE: (415) 464-4359

SUBSTANCES INVOLVED:  
 (1) Low/Medium Hydrocarbons  
 (2) oil and Grease

QUANTITY LOST (GALLONS): \_\_\_\_\_  
 UNKNOWN

DISCOVERY/ABATEMENT:  
 DATE DISCOVERED: 05/10/90  
 HOW DISCOVERED:  TANK TEST  TANK REMOVAL  OTHER  
 DATE DISCHARGE BEGAN: \_\_\_\_\_  
 UNKNOWN

METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY):  
 REMOVE CONTENTS  REPLACE TANK  CLOSE TANK  
 REPAIR TANK  REPAIR PIPING  CHANGE PROCEDURE  
 OTHER

SOURCE/CAUSE:  
 TANK LEAK  UNKNOWN  
 PIPING LEAK  OTHER

CAUSE(S):  
 OVERFILL  RUPTURE/FAILURE  SPILL  
 CORROSION  UNKNOWN  OTHER

CASE TYPE: CHECK ONE ONLY  
 UNDETERMINED  SOIL ONLY  GROUNDWATER  DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)

CURRENT STATUS: CHECK ONE ONLY  
 NO ACTION TAKEN  PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED  POLLUTION CHARACTERIZATION  
 LEAK BEING CONFIRMED  PRELIMINARY SITE ASSESSMENT UNDERWAY  POST CLEANUP MONITORING IN PROGRESS  
 REMEDIATION PLAN  CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY)  CLEANUP UNDERWAY

REMEDIAL ACTION: CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)  
 CAP SITE (CD)  EXCAVATE & DISPOSE (ED)  REMOVE FREE PRODUCT (FP)  ENHANCED BIO DEGRADATION (IT)  
 CONTAINMENT BARRIER (CB)  EXCAVATE & TREAT (ET)  PUMP & TREAT GROUNDWATER (GT)  REPLACE SUPPLY (RS)  
 VACUUM EXTRACT (VE)  NO ACTION REQUIRED (NA)  TREATMENT AT HOOKUP (HU)  VENT SOIL (VS)  
 OTHER (OT)

COMMENTS:  
 See attached Report. was told by Mr. Levi to determine if ground water has been impacted, and to install wells to define gradient and extent of contamination. Also said that soil would require additional work when the tanks were removed.