

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
07-13-06

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



sent
05-08-06

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

May 5, 2006

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

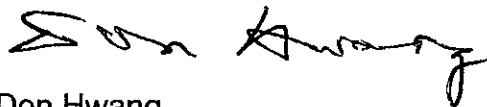
Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory 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%20reporting)).

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.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



WT
02-19-04

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-17-01

R0261

ENVIRONMENTAL HEALTH SERVICES
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1131 Harbor Bay Parkway, Suite 250
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(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,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami', 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



06-27-01
R0261

ENVIRONMENTAL HEALTH SERVICES
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1131 Harbor Bay Parkway, Suite 250
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(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.

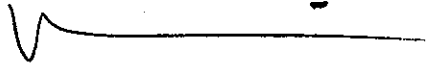
Mr. Cook informed me that after the over-excavation activity the area will be back filled with clean soil followed by submittal of a workplan to delineate the extent of groundwater plume.

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 'W' 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
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ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



06-22-01

R0261

ENVIRONMENTAL HEALTH SERVICES
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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.

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.

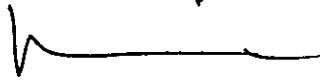
Mr. Cook informed me that after the over-excavation activity the area will be back filled with clean soil followed by submittal of a workplan to delineate the extent of groundwater plume.

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, appearing to read 'Amir K. Gholami', with a stylized flourish at the end.

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
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ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



05-10-01

PO261

ENVIRONMENTAL HEALTH SERVICES
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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.

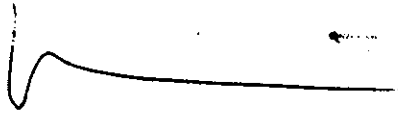
There were 44,000ppb, 52,000ppb, <1700ppb, and 390ppb of TPH-g, MTBE, TAME, and Benzene in water sample TB-3. However, the highest Benzene level was detected in TB-1 at 880ppb.

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, appearing to read 'Amir K. Gholami', with a long horizontal stroke extending to the right.

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
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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-26-01

20261

ENVIRONMENTAL HEALTH SERVICES
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1131 Harbor Bay Parkway, Suite 250
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(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
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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



03-30-01

20261

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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(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.**

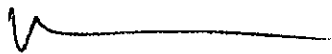
Furthermore, please address the following issues:

- 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-12-00

20261

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
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**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



SENT 8-2-2000

Ro # 261

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**

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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FAX (510) 337-9335

Dear Mr. Mashoon:

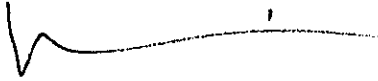
This office is in receipt of the "Groundwater Monitoring Report, June 2000 Sampling dated June 3, 2000, submitted by Robert E. Kitay of Aqua science Engineers, Inc. Please consider the following comments regarding this document:

- 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,



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



SENT 10-27-99
including ca's

20261

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

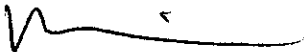
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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



RO# 261

July 8, 1998

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Leroy Griffin,
Supervisor
City of Oakland Fire Department
Emergency Services
505 14th Street
Oakland, CA 94601

RE: Transfer of Underground Storage Tank (UST) Projects

Dear Leroy:

As we discussed earlier, with my recent transfer from the CUPA program to Environmental Health's Household Hazardous Waste Program (HHW), the UST projects previously under my supervision need to be re-assigned. The sites in my caseload located within our CUPA area were assigned to Rob Weston. The remaining sites, in your jurisdiction, I am forwarding to you unless otherwise noted.

Following is a case summary of sites with tanks with regard to certification readiness:

2951 High Street, Zima Corporation (RO# 261)

Mr. Mo Mashoon, RP, has been contacted several times to provide this office with the documentation needed to re-permit and certify the station. At this time the following requirements remain unsatisfied:

- An annual test capable of detecting a release equivalent to .1 gph defined at 150% of normal operating pressure.
- The leak monitor must be reconfigured to allow .2 gph leak detection and the USTs must be filled to over 90% capacity when tested on a monthly basis. The hard copy of test data must include the calculated lead rate and leak threshold.

8255 San Leandro Street, SF-Oakland Truck Stop (RO# 85)

Hernon and I witnessed the lining of two UST at this site. In addition to lining work, other upgrade work to different tanks was also in process. This office had approved of the lining upgrade. The other work was not included in their submittal and was not approved. The contractor on record, Semco, and Nissan Saiden, the RP, were contacted several times regarding the status of this station without response.

Issues not yet resolved include but may not be limited to the following:

- The certified engineer's report on the lining job has yet to be submitted: both suitability of the UST to line and the adequacy of the lining work conducted.

- An accurate workplan has yet to be submitted. The work encountered at the site was not fully covered by the current workplan.
- Accurate and up to date Forms A, B, C, 1995 version have yet to be submitted.
- Accurate and up to date monitoring, spill response plans (s) have yet to be submitted.
- System tightness tests that were conducted post modification have yet to be reported.
- Other issues such as Financial Responsibility, plot plans etc. also remain unaddressed.

1395 7th Street, Trucker's Friend (RO# 53)

The facility removed and installed UST. Two tanks, one being compartmentalized, were installed. The systems were checked and passed. Paperwork, though, has yet to be finalized. To date the following still has not been submitted

- State Form A, B, C on the 1995 form
- Precision test results
- It is assumed that "Option 3" for double wall pipe is used. The equipment in place is compatible with the requirements if this is the approach in use.

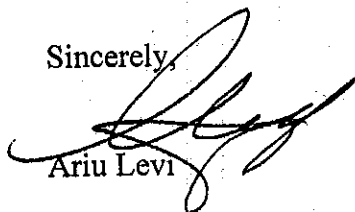
In addition to the above sites, the following is an update on a site that has not been closed or formally transferred to the LOP:

Bay Bridge Paint Booth

The soils report has yet to be submitted. After talking to CalTrans and their consultants, the report will be sent to this office tomorrow. Based on our conversation it appears that the site will be LOP eligible. As such, this case will be handed over to Larry Seto to complete.

Please let me know if I can provide any assistance to you and your staff as these cases are dealt with. Paperwork relevant to these sites, or for that matter other sites in Oakland, sent to me will be forwarded to you.

Sincerely,


Ariu Levi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO #261

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

STD 1038

RE: Zima - 2951 High Street, Oakland, CA

Dear Mr. Mashoon:

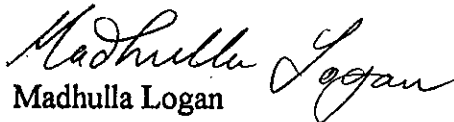
I am in receipt of the initial risk assessment document, dated May 19, 1997, addendum to the risk assessment report, dated August 5, 1997 and the final risk assessment document, dated August 22, 1997, prepared by Christopher Palmer, for the above referenced site.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#261

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. 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
Hazardous Material Specialist

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#261

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

2024

September 17, 1996

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

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, #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 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

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

RO# 261

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

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.



March 11, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

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 overfill, 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

WR

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20201

RAFAT A. SHAHID, Assistant Agency Director

STID # 1038
September 20, 1994

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Mr. Mohammad Mashhoon
Owner/ Operator
Zima Center Gasoline Station
2951 High Street
Oakland, California 94619

Re: FIVE YEAR UNDERGROUND TANK PERMIT AT
HIGH STREET GAS STATION, 2951 HIGH STREET, OAKLAND 94619

Dear Mr. Mashhoon:

Please find enclosed a five-year underground storage tank permit certificate. For the operation of four fuel tanks, located at the site noted above. This permit is being issued, contingent upon the facility's compliance with all applicable underground tank monitoring requirements. These conditions are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective May 5, 1994. In order to maintain a valid permit, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected. Below is a summary of the monitoring requirements for your facility:

1. Sections 2645 and 2646 - Inventory Reconciliation

- a) Record the daily variation in inventory reconciliation. This is the difference between the measured inventory in the tank and the calculated inventory. The calculated inventory shall be determined by adding the fuel inputs from deliveries and subtracting the day's sales withdraws from the physically measured inventory of the day before.

Meters or gauges used to measure the in tank inventory must be approved by this office. Commercial gauges and measuring devices should meet the standards in Title 4, Chapter 9, of the California Code of Regulations (C.C.R.) and be inspected by the County Department of Weights and Measures.

Zima ctr.
September 20, 1994
Page 2 of 3

You are advised that your manual stick readings, used to measure the physical inventory, may be evaluated by a third party certified statistical analyst (SIR). You are required to utilize a SIR company where the highest anticipated ground water may come to less than 20 feet below the bottom of the tank. If the highest anticipated groundwater is lower than 20 feet from the bottom of the tanks, SIR may not be required. In the latter case the following procedures will apply.

Daily variations shall be summed for a period of one month. If monthly variations exceed 1% per cent of the monthly tank delivery plus 130 gallons, this office must be notified. An investigation as to the cause of excess variations must be conducted and reported to this office.

- b) Submit an annual statement to the office which states that all inventory reconciliation data are within allowable limits or list the times and corresponding variations when allowable limits were exceeded. This statement shall be executed under penalty of perjury.

2. Section 2643 - Non-visual Monitoring

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or a leak rate of three gallons per hour at 10 p.s.i. exists (the red-jacket mechanical flow restrictors, mounted on product turbines are acceptable); and

Annual piping system integrity testing shall be conducted which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 (one and a one half times) normal operating pressure.

- b) Annual tank integrity testing (or bi-annually with SIR) shall be conducted which is capable of detecting a release of 0.1 gallon per hour at or above the maximum product level of the tank.

3. Section 2663 - Overfill Prevention

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.

Zima ctr.
September 20, 1994
Page 3 of 3

4. Section 2643 et. seq., Non-Visual Monitoring

- b) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment. Maintain the plan on site for review.

5. Section 2712 - Permit Conditions

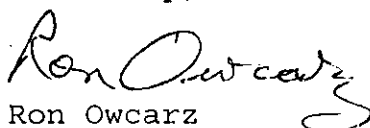
- a) Retain all monitoring and maintenance records on-site or at a readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.

Should you have any questions or concerns regarding the contents of this letter, please call me at (510)567-6742.

Sincerely,



Ron Owcarz
Hazardous Materials Specialist

cc: Edgar Howell, Chief Haz. Mat. Alco, (K.T.-files)
Brian Oliva, Haz. Mat. Specialist, AlCo. E.H.D.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20261

RAFAT A. SHAHID, Assistant Agency Director

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

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,

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20261

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

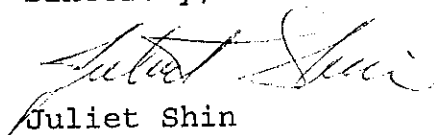
disposal of the stockpiled soil shall be submitted. Per my conversation with Mr. Hamedi on August 9, 1994, the stockpiled soil is currently fully covered with visqueen. This soil must remain covered until it is hauled off site.

- 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



20261

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,

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

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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0261

RAFAT A. SHAHID, Assistant Agency Director

Certified Mailer# 0386 338 186

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

May 16, 1994

D.I. Chadbourne Inc.,
204 East 2nd Ave.,
San Mateo, CA 94401

Subject: Permit for Underground Storage Tank Upgrade/Interior
Lining of Steel Tanks located at 2951 High Street,
Oakland, 94619

Dear Mr. Chadbourne:

This office has received the Underground Tank Installation/Modification Permit Application, submitted by your office on behalf of the High Street Gas Station, located at the aforementioned address. Thank you for the submission of the documents. Upon review of the permit application, several points are in need of clarification, or otherwise enumeration, prior to the issuance of a permit for said upgrading of the systems.

Under Section 2660, (k), of Title 23 of the Underground Storage Tank Regulations, this office cannot approve the upgrading of a system "unless it can be proven that the UST system is structurally sound and the method of repair or upgrade will prevent unauthorized release...". This office must, therefore, inspect **each** tank during the installation of the lining. This will entail specific notification prior to the completion of the lining of the tanks. According to the protocol established by your firm, this should take place during the "cleaning and preparing" phase 5 (as noted on page 5 of the DC Technologies Specifications or following the "Cleaning the tank for lining operations", (phase 9). Please contact this office for during **both** phases for on-site inspections.

Please be advised that if at any time, if it appears that the lining of any specific tank would not prevent an unauthorized release, that approval of the procedure by Alameda County Division of Hazardous Materials, the Local Enforcement Agency, will be revoked.

page 2 of 3

Regarding the Interior Tank Lining Requirements Section 2663 Subsection (a), this office concurs that the installation of double-walled piping and the Veeter Root TLS 250 system will adequately safeguard against unauthorized releases.

Upon completion of the lining of the USTs, in accordance with Section 2663 (b) (2), it will be necessary for you to submit certification by a "special inspector". This certification shall include all the provisions as stated in Section 2663, part (2) A to H., and should be submitted as required, "within 30 calendar days of the completion of the inspection".

In regards to the installation of cathodic protection as required for the upgrading of the USTs for compliance with the December 22, 1998 timeline for upgrading of all single-walled USTs, it will be necessary for all components of the installation of cathodic protection to adhere to Section 2662 (c) (1) (b), of Title 23: "Cathodic protection shall be designed, installed, and inspected as specified in section 2635(a)(2)(A). All cathodic protection shall be constructed in accordance with applicable state and local well regulations". Following installation of the cathodic protection system, please certify that these requirements have been met. The certification should be sent to this office within 30 calendar days.

In light of the fact that the modification will require "confined space entry", please submit proof of proper training for all employees that will be required to enter the USTs. This evidence should be submitted to this office immediately.

Please be advised that a health and safety plan should be submitted to this office **prior** to approval of the installation of the liner(s). This Health and Safety Plan should incorporate the confined entry contemplated by your firm. It should also adhere to 29CFR 1910: 120, or State OSHA requirements.

It will be necessary for you to obtain the concurrence of the Oakland Fire department for approval of all cutting of the tank(s). Please provide this office with written approval from that Department prior to initiating such a procedure.

page 3 of 3

If you have any questions, please contact this office. The number is (510) 271-4320.

Sincerely,



Brian P. Oliva, REHS, REA
Hazardous Materials Specialist
Underground Tank Program

cc: Edgar Howell, Chief, Division of Hazardous Materials
Mohammad Mashood, 2951 High St., Oakland, CA 94619
Ron Owcarz, Hazardous Materials Specialist
Oakland Fire Department

(A)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0261

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.

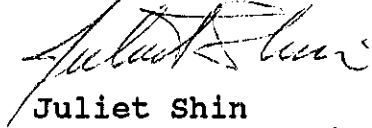
Therefore, you are required to begin investigations at the above site, as outlined in the January 13, 1994 letter (refer to the attached copy of the letter). The referenced PSA work plan is due **within 45 days** of the date of this letter.

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)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0261

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
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March 11, 1994

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645 16th Ave.
San Francisco, CA 94118

STID 1038

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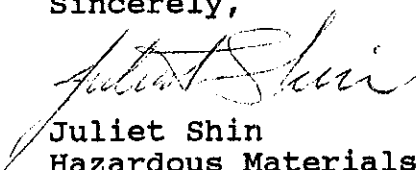
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If you have any questions or comments, please contact me at (510) 271-4530.

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
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21 Tamal Vista Blvd., Ste 196
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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 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 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 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.**

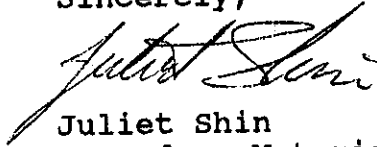
The State Water Resources Control Board has a Petroleum Underground Storage Tank Cleanup Fund available to sites to assist in investigations and cleanup. This office encourages you to look into applying to this fund. The address and phone number of the trust fund is:

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



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0261

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

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Dear Mr. Mashhoon,

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- 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

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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.

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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.

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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)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0261

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.**

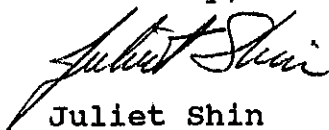
Mr. Mohammad Mashhoon
Re: 2951 High St.
December 29, 1993
Page 4 of 4

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
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0261

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 12, 1993

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

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

STID 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)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0261

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.

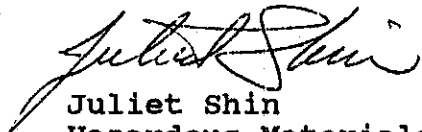
Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that investigations be conducted whenever an unauthorized release of product is suspected from an underground storage tank and associated piping. The observed soil contamination would indicate that such an event 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



R0261

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

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.

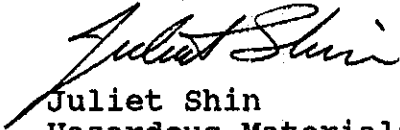
Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that investigations be conducted whenever an unauthorized release of product is suspected from an underground storage tank and associated piping. The observed soil contamination would indicate that such an event 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 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 Hiatt, 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



R0261

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.

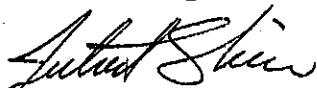
You are required to submit a work plan to this office addressing the determination of the extent of soil contamination at the site. Additionally, you must determine whether the ground water has been impacted by releases from the site. According to the Contamination Report, there is a well located adjacent 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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0261

RAFAT A. SHAHID, Assistant Agency Director

October 21, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

ATTN: Mohammed Mashhoon

Gas -n- Go
2951 High St.
Oakland 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,

ED did sign this (made copy b4 he signed it)
Edgar B. Howell III, Chief
Hazardous Materials Division

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0261

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

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



R0261

March 8, 1991

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

Mr. Moe Mashoon
Zima Centar Inc.
5 Admiral Dr. #301
Emeryville, CA 94608

NOTICE OF VIOLATION

RE: Underground storage tank permit requirements
High Street Arco, 2951 High Street, Oakland, CA 94619

Dear Mr. Mashoon:

This letter follows up an inspection performed at your facility on February 27, 1991. The inspection was performed to evaluate whether the conditions for the 5 year underground storage permit were being met prior to its issuance. Title 23 of the CA Code of Regulations regulates the operation of underground storage tanks in California.

The following violations were noted:

Section 2641(5)d, 2643(c) requires that all single walled underground storage tanks and pipelines be tested annually.

Section 2641 requires that you maintain daily inventory records. Upon inspection there were no inventory reconciliation records available. Inventory records are required to be maintained onsite.

Section 2712 requires that daily inventory reconciliation records be maintained onsite for 3 years.

Section 2644(e,f) requires that quarterly monitoring reports (specifying fuel inventory disparities over the allowable limit) be sent to our office following each three month interval.

Sections 2711(a)9, and 2712(c) require that a written monitoring plan be prepared and maintained onsite describing your monitoring procedure

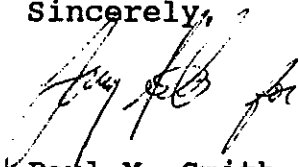
Title 22 of the Code of Regulations requires that the storage of Hazardous Waste not exceed 90 days. Upon inspection it was noted that a drum labelled Hazardous Waste, dated 10/25/90 was being stored in back of the above facility. The drum was also unsecured. You are requested to have the drum removed and properly disposed of. You are requested to provide this office with a copy of the Hazardous Waste Manifest detailing the ultimate destination of the drum.

You are requested to comply with the above regulations within 10 days of the receipt of this letter.

I have scheduled a re-inspection at the above location for Wednesday March 13, 1991 at 4:00P.M..

Any questions regarding the above requirements can either be addressed during the above meeting or by calling me at 415/ 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Juma Hussein, High Street Arco
Howard Hatayama, DHS

LS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0261

September 18, 1990

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

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

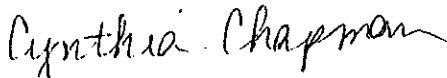
To date, we have only received the tank test results, performed July 31, 1990. We have not received any other information that was requested, and apparently no monitoring well(s) was installed.

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
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection
Steven Luquire, RWQCB
George Brewster
Al Eshom