

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

December 26, 2007

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. RO0000265 and Geotracker Global ID T0600101680, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA 94601 – Dissolved Oxygen Measurements

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "Proposed Method for Dissolved Oxygen Measurements," dated December 12, 2007, which was prepared on your behalf by SOMA Environmental Engineering, Inc. SOMA proposes the use of a YSI Incorporated YSI 556 Multi-Probe System (MPS) to perform dissolved oxygen measurements. The YSI MPS measures dissolved oxygen in groundwater using a closed system consisting of a downhole pump and flow cell. The proposed method for measuring dissolved oxygen in groundwater samples is acceptable and is to be implemented for future groundwater sampling events.

We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **March 28, 2008 – MPE Pilot Test Report**
- **45 days following the end of each quarter – Groundwater Monitoring and Remediation System Operation Report**

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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


Abolghassem Razi
RO0000265
December 26, 2007
Page 3

AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Richard McKinney, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

November 21, 2007

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. RO0000265 and Geotracker Global ID T0600101680, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA 94601 – Work Plan Approval

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "Multi-Phase Extraction Pilot Test Workplan," dated November 7, 2007, which was prepared on your behalf by SOMA Environmental Engineering, Inc. The Multi-Phase Extraction Pilot Test Workplan proposes conducting a multi-phase extraction (MPE) pilot test using existing wells MW-1 and MW-3. The proposed scope of work may be implemented provided that the technical comments below are addressed during the field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS ON PROPOSED MPE PILOT TEST

- 1. Monitoring of Adjacent Wells during Pilot Test.** The use of magnehelic gauges in adjacent monitoring wells to measure vacuum and estimate an area of influence is acceptable. During pilot testing of well MW-1, we request that you measure vacuums in wells MW-3, MW-6, MW-7, and MW-8. During pilot testing of well MW-3, we request that you measure vacuums in wells MW-1, MW-2, MW-6, and MW-7. Water levels are to be measured periodically in adjacent wells throughout the pilot test in order to estimate drawdown.
- 2. Vapor Monitoring.** In order to confirm vapor concentrations measured in the field, we request that air samples be collected for laboratory analysis at the beginning and end of pilot testing for wells MW-1 and MW-3. The vapor samples are to be collected using one-liter Tedlar bags and analyzed for TPHg and BTEX using EPA Methods TO3 and TO15. Please present the results in the DPE and Air Sparging Pilot Test Report requested below.
- 3. Test Data Collection.** MPE test data including applied vacuum, induced vacuum, well flow, dilution air flow, vapor concentrations, extracted groundwater volume, and groundwater drawdown are to be collected initially at 15 minute intervals and then at progressively longer

intervals as operational data stabilize. Please present these results in the MPE Pilot Test Report requested below.

4. **Applied Vacuum Setting.** After each extraction well has been dewatered to the target depth, the applied vacuum setting is to be increased incrementally to reach an optimal extraction rate. Once an optimal extraction rate is reached, the pilot test is to be continued at that rate to evaluate the area of influence and rate of hydrocarbon removal. Please present these results in the MPE Pilot Test Report requested below.

TECHNICAL REPORT REQUEST

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

- **March 28, 2008** – MPE Pilot Test Report
- **45 days following the end of each quarter** – Groundwater Monitoring and Remediation System Operation Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the

Abolghassem Razi
RO0000265
November 21, 2007
Page 3

attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

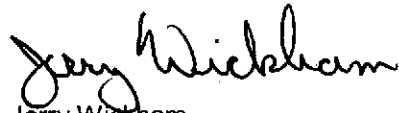
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

November 5, 2007

120 265

Mr. Jerry Wickham
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

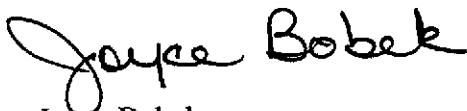
Re: **STID#3337** Fourth Quarter 2007 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

Please be advised that SOMA has scheduled the **Fourth Quarter 2007** groundwater monitoring event to be conducted on Thursday, November 15th and Friday, November 16th. Our field crew will arrive at the site at approximately 9:30am. Sometimes, however, unforeseen events may cause us to have to reschedule and should this be the case you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr at (925) 734-6400.

Sincerely,



Joyce Bobek
Vice President of Operations

cc: Mr. Abolghassem Razi

RECEIVED
NOV 6 2007
ENVIRONMENTAL HEALTH SERVICES

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

ENVIRONMENTAL HEALTH SERVICES

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

October 19, 2007

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. RO0000265 and Geotracker Global ID T0600101680, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA 94601

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "Response to Technical Comments by Alameda County Health Services (ACHS)," dated September 11, 2007 and prepared on your behalf by SOMA Environmental Engineering, Inc. The Response to Comments was prepared in response to ACEH correspondence dated July 18, 2007, in which we expressed concerns regarding the effectiveness of remedial efforts to date and presented technical comments regarding a proposed multi-phase extraction (MPE) pilot test using existing wells MW-1 and MW-3. Several of these concerns were also discussed during a meeting on October 19, 2007 between Mr. Tony Razi, Mr. Mansour Sepehr, and myself.

The Response to Comments dated September 11, 2007 did not fully address our comments. As discussed below, these concerns and comments are to be addressed through data acquisition during the proposed MPE pilot test. Therefore, we request that you prepare a Work Plan for MPE Pilot Testing by **December 7, 2007**.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS ON PROPOSED MPE PILOT TEST

1. **Lateral Extent of Contamination.** We continue to believe that the lateral extent of contamination is larger than represented in the response to this comment and that any appearance of "halos" around wells MW-1 and MW-3 are likely artifacts of the distribution of sampling locations. Therefore, it will be necessary to demonstrate through monitoring and data collection during the pilot test that MPE will be effective over a larger area than the "smear zones" centered around wells MW-1 and MW-3. Please include sufficient monitoring of the MPE pilot test to conclusively demonstrate the area of influence.
2. **Historical Soil Sampling Results and Water Levels.** We believe that the claims of steady-state drawdown and dewatering of the smear zone during an MPE pilot test overstate the conditions that can be achieved. As discussed in technical comment 1 above, it will be necessary to demonstrate through monitoring and data collection during the pilot test that

MPE will be effective in dewatering a larger area than the immediate vicinity of the MW-1 and MW-3 well bores. Please include sufficient monitoring of the MPE pilot test to conclusively demonstrate the drawdown conditions.

3. **Silty Clay Soils.** The response to our comment regarding silty clay soils missed the point of our comment. We will not reiterate the comment; however, we expect that in the future, you will not entirely ignore site data that may have some application when evaluating remedial alternatives.
4. **Effects of Tank Pit Backfill.** The response to our comment regarding the effects of tank pit backfill is adequate.
5. **Hydrogeologic Cross Sections.** The hydrogeologic cross sections presented in the response to comments are adequate.
6. **Performance of SVE and Air Sparging Systems.** The influent vapor concentrations to the soil vapor extraction system are generally low and appear to decrease rapidly following system start up. As discussed during our meeting on October 19, 2007, operation of the SVE and air sparging systems are to be discontinued until remedial alternatives are evaluated more thoroughly.
7. **Proposed Method for Dissolved Oxygen Measurements.** The discussion of dissolved oxygen measurements and proposal to measure dissolved oxygen in groundwater bailed from the wells is rejected. Please provide a proposal for dissolved oxygen measurements that is more consistent with accepted industry practices. Please review current groundwater monitoring procedures and present a proposal for dissolved oxygen measurements and other revisions to the groundwater monitoring program no later than **December 7, 2007**.

TECHNICAL REPORT REQUEST

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

- **December 7, 2007** – MPE Pilot Test Work Plan
- **45 days following the end of each quarter** – Groundwater Monitoring and Remediation System Operation Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

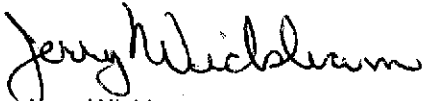
Abolghassem Razi
RO0000265
October 19, 2007
Page 4

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Reporting (ftp) Instructions

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ENVIRONMENTAL ENGINEERING, INC.



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

August 13, 2007

R0265

Mr. Jerry Wickham
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **STID#3337** Third Quarter 2007 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

Please be advised that SOMA has scheduled the **Third Quarter 2007** groundwater monitoring event to be conducted on Monday, August 20th and Tuesday, August 21st. Our field crew will arrive at the site at approximately 9:30am. Sometimes, however, unforeseen events may cause us to have to reschedule and should this be the case you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or Tony Perini at (925) 734-6400.

Sincerely,

A handwritten signature in cursive script that reads "Joyce Bobek".

Joyce Bobek
Vice President of Operations

cc: Mr. Abolghassem Razi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



F

ENVIRONMENTAL HEALTH SERVICES

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

July 18, 2007

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. RO0000265 and Geotracker Global ID T0600101680, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA 94601

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted documents entitled, "Multi-Phase Extraction Pilot Test," dated May 22, 2007, Second Quarter 2007 Groundwater Monitoring and Remediation System Operation Report," dated July 5, 2007, and "Extraction Well Installation Report and Upgrade of the Groundwater Remediation System," dated May 31, 2007. All reports were prepared on your behalf by SOMA Environmental Engineering, Inc. The "Multi-Phase Extraction Pilot Test," dated May 22, 2007 proposes conducting a multi-phase extraction (MPE) pilot test using existing wells MW-1 and MW-3. We do not concur with implementation of an MPE pilot test at this time. We request that you review existing data in order to address the technical comments below. Please provide responses to the comments **no later than September 11, 2007.**

In general, we are concerned that several remedial technologies have been attempted at this site since 1999 with limited success. Elevated concentrations of fuel hydrocarbons appear to exist in the source area and dissolved petroleum hydrocarbons continue to be detected in downgradient wells. The remedial systems do not appear to be removing contamination from soil and groundwater at a sufficient rate to move the site towards closure.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS ON PROPOSED MPE PILOT TEST

1. **Lateral Extent of Contamination.** The MPE Pilot Test Work Plan states that elevated concentrations of dissolved hydrocarbons have been consistently detected in wells MW-1 and MW-3. The Work Plan goes on to indicate that concentrations are elevated in, "areas (halos) centered on and in close proximity to groundwater monitoring wells MW-1 and MW-3." This description of the extent of elevated dissolved phase concentrations is an oversimplification and may be misleading. Any appearance of "halos" around wells MW-1 and MW-3 are likely artifacts of the distribution of sampling locations. During the second quarter 2007 groundwater sampling, the highest concentration of TPHg in groundwater was detected in well MW-6, which is approximately 55 feet east of MW-3. It is likely that elevated

concentrations of dissolved hydrocarbons are present over a large area of the site and not centered around wells MW-1 and MW-3. Please avoid using similar oversimplifications in future documents. In the Response to Comments requested below, please comment on whether the recommendation to implement an MPE pilot test was based on the assumption that dissolved phase contamination and "smear zones" are centered around wells MW-1 and MW-3.

2. **Historical Soil Sampling Results and Water Levels.** Soil samples were collected from the vadose zone and capillary fringe (approximately 14 feet bgs) in the MW-1 and MW-3 soil borings on August 20, 1993. Soil samples collected at 10 and 14 feet bgs from the MW-1 soil boring (B-11) contained less than 20 and 630 milligrams per kilogram (mg/kg), of TPHg, respectively. Soil samples collected at 10 and 14 feet bgs from the MW-3 soil boring (B-7) contained 18 and 250 mg/kg, of TPHg, respectively. The depths to water in wells MW-1 and MW-3 during the second quarter 2007 groundwater monitoring event were 11.58 and 11.63 feet bgs, respectively. Please review these soil sampling results, the current depth to water, and the expected depth of dewatering in wells MW-1 and MW-3 during MPE to discuss the potential effectiveness of MPE in the Response to Comments requested below.
3. **Silty Clay Soils.** Boring logs from wells MW-1 and MW-3 as well as other borings in the area of the USTs describe the soils within the capillary fringe and the zone of water table fluctuation (smear zone) as silty clay in texture. In order for MPE to be successful, soils within the zone of water table fluctuation must be dewatered and air flow through the contaminated soils established. Please review the results from vapor extraction and air sparging tests and remediation, and discuss in the Response to Comments requested below, whether MPE is likely to be successful in the silty clay soils at the site.
4. **Effects of Tank Pit Backfill.** Based on the sampling locations and excavation outline shown in the report entitled, "Soil Sampling below Removed Underground Storage Tanks at Tony's Express Station," dated July 27, 1993 and prepared by Soil Tech Engineering, Inc, wells MW-1 and MW-3 appear to be located within close proximity to the former tank pit excavation. Please review the location of the former tank pit excavation to estimate the distance from wells MW-1 and MW-3 to the former tank pit excavation. In the Response to Comments requested below, please discuss the potential effect of the tank pit backfill on MPE tests in wells MW-1 and MW-3. Specifically, will the backfill act as a preferential pathway and prevent the MPE from being effective on the more contaminated, finer-grained soils below the backfill?
5. **Smear Zone Thickness.** The MPE Pilot Test Work Plan indicates that the smear zone is approximately 20 feet thick in both wells MW-1 and MW-3 based on review of boring logs. As described in the Work Plan, smear zones form when non-aqueous phase liquid spreads laterally on top of the water table and is distributed vertically during seasonal water table fluctuations. Seasonal water table fluctuations at the site are on the order of a few feet. In the Response to Comments requested below, please describe how a 20-foot thick smear zone formed near wells MW-1 and MW-3.
6. **Hydrogeologic Cross Sections.** In order to help evaluate the lateral and vertical extent of contamination in relation to the depth of existing monitoring and remediation wells, please prepare a minimum of two cross sections. One of the hydrogeologic cross sections should

extend in a downgradient direction through the former UST pit. The cross sections are to illustrate the lateral and vertical extent of soil layers, depths where groundwater was first encountered in borings and the static water levels, observations of free product, staining, or odor, the approximate location of the groundwater table, USTs and dispensers (including the tank pit backfill), and analytical data from soil samples and groundwater samples for each of the borings and wells shown on the cross sections. In addition, please show the total depth and screen intervals for all wells and sparge points. Please present these cross section(s) in the Response to Comments requested below.

TECHNICAL COMMENTS ON SECOND QUARTER 2007 GROUNDWATER MONITORING AND REMEDIATION SYSTEM OPERATION REPORT

7. **Performance of SVE System.** The influent vapor concentrations to the soil vapor extraction system are generally low and appear to decrease rapidly following system start up. Please review the performance of the system and evaluate whether continued operation of the system should continue. Please present this evaluation in the Response to Comments requested below.
8. **Performance of Air Sparging System.** Air sparging points are located directly upgradient from wells MW-6 and MW-7; however, the dissolved oxygen levels measured in the wells during the second quarter 2007 appear to be lower than dissolved oxygen levels measured prior to the initiation of air sparging. In the Response to Comments requested below, please comment on how the effectiveness of the air sparging system is being monitored and evaluated.
9. **Bioattenuation Study.** The discussion of natural attenuation data in the Second Quarter 2007 Groundwater Monitoring Report is incomplete and contains unsupported conclusions. As an example, the report states (page 3, 5th paragraph) that, "Negative redox potentials indicate that contaminants in groundwater are conducive to anaerobic biodegradation." The existence of negative redox conditions within a plume may be a result of aerobic degradation processes. However, it is not logical to assume that groundwater contaminants will degrade anaerobically simply because negative redox conditions exist. The report concludes that, "the bioattenuation study confirmed occurrence of biodegradation beneath the Site. Based on this study, the affected areas appear to be in the vicinity of the USTs, around wells MW-1 and MW-3 and the eastern section of the site." The cursory discussion of bioattenuation data within the report does not support these statements. There is no valid comparison of the measured parameters in the UST area to the remainder of the site or parameters within the plume versus outside the plume to support such conclusions. In addition, there is no discussion of the accuracy, consistency, and representativeness of the data. Prior to conducting any further studies of natural attenuation, we require that you provide a detailed proposal describing the methods for collecting and analyzing the data.
10. **2001 Increase in Concentrations.** A review of the dissolved phase concentrations over time in wells near the USTs indicates that a significant and sudden increase in concentrations occurred after the sampling event on 8/8/2001 and prior to the 11/19/2001 sampling event. The concentration of MTBE detected in groundwater from well MW-1 increased from 2,000 µg/L on 8/8/2001 to 74,000 µg/L on 11/19/2001. Prior to 8/8/2001, the highest concentration of MTBE detected in groundwater from well MW-1 was 150 µg/L. In

the Response to Comments requested below, please describe the type and volume of any releases which may have caused this increase in concentrations

11. **Table 1.** Table 1 in the quarterly monitoring reports presents, "Historical Groundwater Elevation Data & Analytical Results." Please review the accuracy of the data presented for the initial sampling of wells MW-1, MW-2, and MW-3. Based on review of the laboratory analytical reports (Soil Tech Engineering, November 8, 1993), wells MW-1, MW-2, and MW-3 were initially sampled on October 5, 1993 rather than October 5, 1994. The concentration of TPHg detected in groundwater collected from well MW-2 on October 5, 1993 was 260,000 micrograms per liter ($\mu\text{g/L}$) and is not reported in Table 1. The concentration of TPHg detected in groundwater collected from well MW-3 on October 5, 1993 was 30,000,000 $\mu\text{g/L}$ rather than 3,000,000 as reported in Table 1. Please make necessary corrections in future groundwater monitoring reports.

TECHNICAL COMMENTS ON EXTRACTION WELL INSTALLATION REPORT

12. **Effectiveness of Groundwater Extraction.** The "Extraction Well Installation Report and Upgrade of the Groundwater Remediation System," dated May 31, 2007 describes the installation of extraction well EX-1 within the tank pit backfill. Groundwater is to be extracted from well EX-1 and discharged through the on-site carbon treatment system for disposal to the sanitary sewer. Although well EX-1 was installed on February 5, 2007, groundwater extraction from well EX-1 has not commenced; therefore, the potential success of groundwater extraction within the tank backfill is not known. We previously requested that the results from start-up of the groundwater extraction be reported by May 15, 2007. We now request that groundwater extraction be initiated no later than August 1, 2007. The results from start-up of groundwater extraction start-up from well EX-1 are to be reviewed and discussed in the Response to Comments requested below. Specifically, this information may be relevant to address technical comment 4 above.

TECHNICAL REPORT REQUEST

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

- **September 11, 2007** – Response to Comments
- **45 days following the end of each quarter** – Groundwater Monitoring and Remediation System Operation Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

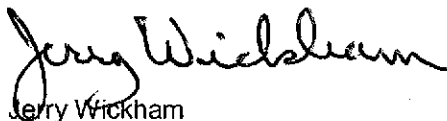
Abolghassem Razi
RO0000265
July 18, 2007
Page 6

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

June 13, 2007

Alameda County

JUN 15 2007

Ms. Molly Ong
East Bay Municipal Utility District
EDMUD – Mail Slot #702
P. O. Box 24055
Oakland, CA 94623-1055

Environmental Health

2007 JUN 15 PM 12:46

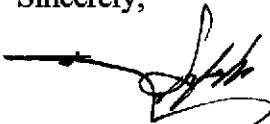
Re: 3609 International Boulevard, Oakland, California 94601
Wastewater Discharge Permit No. 504-27421

Dear Ms. Ong:

Enclosed is SOMA's "Semi-Annual Technical Report: Treatment System Discharge to EBMUD Sewer for Permit No. 504-27421 from December 2006 to May 2007" for the subject site. This report has been uploaded to the State's GeoTracker database.

Thank you for your time in reviewing our report. If you have any questions or comments, please call me at (925) 734-6400.

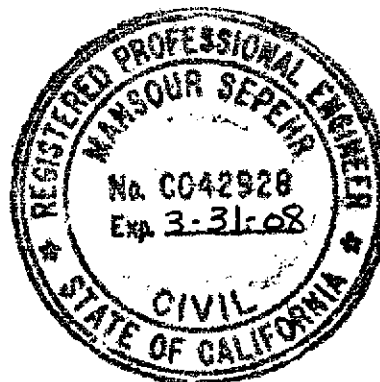
Sincerely,



Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist

Enclosure

cc: Mr. Abolghassem Razi w/enclosure
Mr. Jerry Wickham w/o enclosure ✓
Alameda County Dept. of Env. Health



May 14, 2007

Mr. Jerry Wickham
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

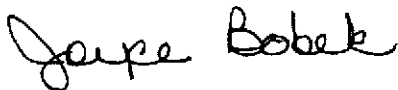
Re: **STID#3337** Second Quarter 2007 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

Please be advised that SOMA has scheduled the **Second Quarter 2007** groundwater monitoring event to be conducted on Tuesday, May 22nd and Wednesday, May 23rd. Our field crew will arrive at the site at approximately 9:30am. Sometimes, however, unforeseen events may cause us to have to reschedule and should this be the case you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or Tony Perini at (925) 734-6400.

Sincerely,



Joyce Bobek
Vice President of Operations

cc: Mr. Abolghassem Razi

RECEIVED
MAY 16 2007
ENVIRONMENTAL HEALTH SERVICES

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

December 12, 2006

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. [REDACTED] Tony's Express Auto Services, 3609 International Blvd., Oakland, CA – Work Plan Approval

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan for Installation of a Groundwater Extraction Well in UST Cluster Backfill," dated November 13, 2006, prepared on your behalf by SOMA Environmental Engineering, Inc. The "Work Plan for Installation of a Groundwater Extraction Well in UST Cluster Backfill," dated November 13, 2006 describes the installation of one groundwater extraction well within the backfill material adjacent to the current USTs at the site. The proposed scope of work is generally acceptable provided that the technical comments below are addressed during implementation of the proposed work.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Soil Samples.** Soils are to be logged continuously below a depth of 4 feet bgs in order to identify the tank backfill material. One soil sample is to be collected for laboratory analysis from the top of the native soil encountered below the base of the tank backfill material. Additional soil samples are to be collected for laboratory analysis for from zones where visible staining, odor, or elevated PID readings are observed. The soil samples are to be analyzed for TPH as gasoline, BTEX, and MTBE by EPA Method 8260B. Please present the results in the Groundwater Extraction System Start-Up Report requested below.
2. **Groundwater Samples.** One groundwater sample is to be collected from the groundwater extraction well for laboratory analysis prior to initiating pumping of the extraction well. Following the initiation of groundwater extraction, groundwater samples are to be collected from the groundwater extraction well for laboratory analysis 48 hours, one week, and one month after initiating pumping of the well. The groundwater samples are to be analyzed for TPH as gasoline, BTEX, and MTBE by EPA Method 8260B. Please present the results in the Groundwater Extraction System Start-Up Report requested below.
3. **Groundwater Extraction Start-Up.** Water levels are to be measured in the extraction well and surrounding monitoring wells prior to and following the start of groundwater extraction

from the proposed well. At a minimum, water levels are to be measured in the extraction well and surrounding monitoring wells during each groundwater sampling event requested in technical comment 2 above. Please present the results in the Groundwater Extraction System Start-Up Report requested below.

TECHNICAL REPORT REQUEST

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

- **May 15, 2007** – Groundwater Extraction System Start-Up Report (may be included within a Groundwater Monitoring and Remediation System Operation Report)
- **45 days following the end of each quarter** – Groundwater Monitoring and Remediation System Operation Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

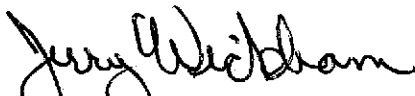
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

From: Joyce Bobek [jbobek@somaenv.com]
Sent: Tuesday, November 21, 2006 9:24 AM
To: Wickham, Jerry, Env. Health
Subject: Fuel Leak Case#RO0000265 - 3609 International Blvd., Oakland, CA

Dear Mr. Wickham,

Please be advised that SOMA Environmental Engineering has scheduled the 4th Quarter 2006 groundwater monitoring event to be conducted on Tuesday, November 28, and Wednesday, November 29, 2006 at the subject site location. Our field crew will be at the site from approximately 9:30 am. until 4:30pm. Sometimes, however, unforeseen events may cause us to have to reschedule and should this be the case, you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or Tony Perini at (925) 734-6400.

Sincerely,
Joyce Bobek
Operations Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

October 24, 2006

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. [REDACTED] Tony's Express Auto Services, 3609 International Blvd., Oakland, CA

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the report entitled, "Third Quarter 2006 Groundwater Monitoring and Remediation System Operation Report," dated October 13, 2006. The report was prepared on your behalf by SOMA Environmental Engineering, Inc. and describes the results of groundwater sampling conducted during September 2006 and ongoing operation of the air sparging, soil vapor extraction, and groundwater extraction systems. The results indicate that elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg), BTEX, and MTBE continue to be detected in groundwater at the site.

The continued detection of elevated concentrations of fuel hydrocarbons in groundwater at the site indicates that a significant contaminant source remains at the site. The ongoing remedial measures appear to be achieving plume control through groundwater extraction along the downgradient property boundary; however, the rate of mass removal appears to be low. Possible alternatives to increase the rate of mass removal were discussed during a meeting between Mr. Razi, Jerry Wickham of ACEH, and Mansour Sepehr of SOMA held at the ACEH's offices on October 24, 2006. Based on the relatively high concentrations of dissolved fuel hydrocarbons detected near the tank pit in well MW-1, Mr. Sepehr indicated that increased mass removal could be achieved by extracting groundwater from the tank pit. Therefore, we request that you submit a Work Plan to increase the rate of mass removal from the area of the tank pit by **January 10, 2007**.

TECHNICAL REPORT REQUEST

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

- **January 10, 2007** – Work Plan
- **45 days following end of each quarter** – Groundwater Monitoring and Remediation System Operation Report

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

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

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

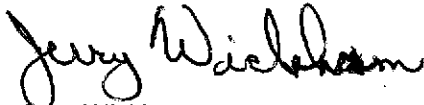
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

From: Walter Bahm [wbahm@waterboards.ca.gov]
Sent: Friday, July 07, 2006 9:51 AM
To: msepehr@somaenv.com
Cc: Wickham, Jerry, Env. Health
Subject: Re: FW: 3609 International Blvd.

Mansour,

Thank you for taking the time to provide me with the Figure and analytical data from 6/15/06 for SVE-1 thru 3 and INF/EFF values.

You have a lot going on at this site and i hate to interfere, but i need to get a more comprehensive picture of what is going on, particularly with regards to the SVE system operation and the proposed SVE/AS system build-out. Additionally, i am trying to profile selected sites for the five year review.

Your reports suggest that the french drain has removed ~200lb of hydrocarbons (since 12/99) and slightly smaller amounts have been removed via the SVE system.

On Geotracker i was able to find much data on the GW Treatment System, however, very little could be found for the SVE system. Has there been similar data developed for the SVE system (including BAAQMD reporting) ?

Undoubtedly, the SVE system has been operated in various configurations. Can you provide me with a brief outline of which wells (i.e. the ISL-1&2, the P-series, or SVE-1 to 3) were/are being extracted from and relate it to the SVE mass removal estimates Table 3 ?

With an INF TPHg value of ~82ppm there appears to be a very weak loading of the abatement system.

Thank You,

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

From: Mansour Sepehr [mailto:msepehr@somaenv.com]
Sent: Thursday, July 06, 2006 3:25 PM
To: 'wbaum@waterboards.ca.gov'
Subject: 3609 International Blvd.

Hello Walter:

Per your request, a map showing the location of the six SVE wells is included. Third Quarter 2005 text is correct, however, the map failed to show the locations of ISL-1 and ISL-2. ISL-1 and 2 are the horizontal wells that were installed by the previous consultant in 1999 and unfortunately no lithologic logs are available. Presumably, these horizontal wells are very shallow I believe about 3-5 feet deep. The BAAQMD's permit belongs to 1999, when the previous consultant applied for it. Since the current modification did not change the permit conditions, we are still operating under the same original permit. In addition, the latest analytical results on vapor samples collected at well heads are also included as you requested. As I mentioned, we are planning to install a larger blower to effectively create enough vacuum inside the newly installed vapor wells. The existing blower has the capacity of creating 59 inches of water vacuum with a maximum air flow rate of 127 scfm. An additional blower with air flow capacity of 160 scfm and 60 inches of water vacuum will be added to the existing one in order to increase flow rate and improve

mass removal efficiency.

Apparently, due to the insufficient vacuum the PID readings of the influent as reported in quarterly groundwater monitoring reports are low. However, the vapor samples collected at well heads contains elevated levels of petroleum hydrocarbons please see the attached lab results. Thank you for your inquiry, please do not hesitate to call me if you need any assistance.

Regards

Mansour Sepehr

(925) 734-6400

....sentWednesday - July 5, 2006 3:32 PM Mansour,

can you send me provide me with well logs for the horizontal wells ISL-1 and 2 that you had mentioned over the telephone today ?

Regarding the SVE system, please provide:

1. copy of the BAAQMD permit application; 2. all laboratory soil vapor analyses; and 3. any type(s) of correlations of PID measurements (basis of removal calculations) with lab data.

Walter Bahm, P.E.
Water Resource Control Engineer
UST Cleanup Fund
State Water Resources Control Board
916/341-5847
fax: 916-341-5806

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

May 4, 2006

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. [REDACTED] Tony's Express Auto Services, 3609 International Blvd., Oakland, CA

Dear Mr. Razi:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Installation of Air Sparge System and Additional Vapor Extraction Wells," dated April 12, 2006, and "Second Quarter 2006 Groundwater Monitoring and Remediation System Operation Report," dated April 26, 2006. Both reports were prepared on your behalf by SOMA Environmental Engineering, Inc. The "Installation of Air Sparge System and Additional Vapor Extraction Wells," dated April 12, 2006 describes the installation of an air sparging system and additional vapor extraction wells. Please continue operation of the air sparging, soil vapor extraction, and groundwater extraction systems and report the results in the quarterly monitoring and remedial system operation reports requested below.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Air Sampling from Individual Soil Vapor Extraction Wells.** In addition to collecting samples of influent and effluent for the soil vapor extraction system, please collect air samples from individual soil vapor extraction wells SVE-1, -2, and -3 during the third and fourth quarter 2006. Please present these results in the quarterly monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **October 3, 2006** – Third Quarter 2006 Groundwater Monitoring and Remediation System Operation Report

- **January 3, 2007** – Fourth Quarter 2006 Groundwater Monitoring and Remediation System Operation Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

April 26, 2006

Mr. Jerry Wickham
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: **StID#3337**
Site Address: 3609 International Blvd., Oakland, California

Dear Mr. Wickham:

SOMA's "Second Quarter 2006 Groundwater Monitoring and Remediation System Operation Report" for the subject property has been uploaded to the State's GeoTracker database and Alameda County's FTP site for your review.

Thank you for your time in reviewing our report. If you have any questions or comments, please call me at (925) 734-6400.

Sincerely,



Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist

Enclosure

cc: Mr. Abolghassem Razi w/report enclosure
Tony's Express Auto Service

Mr. Vince Tong w/report enclosure
Traction International



RECEIVED

APR 17 2006

ENVIRONMENTAL HEALTH SERVICES

200205
SOMA
ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

April 12, 2006

Mr. Jerry Wickham
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: **SID#3337**
Site Address: 3609 International Blvd., Oakland, California

Dear Mr. Wickham:

SOMA's "Installation of Air Sparge System and Additional Vapor Extraction Wells" report for the subject property has been uploaded to the State's GeoTracker database and Alameda County's FTP site for your review.

Thank you for your time in reviewing our report. If you have any questions or comments, please call me at (925) 734-6400.

Sincerely,

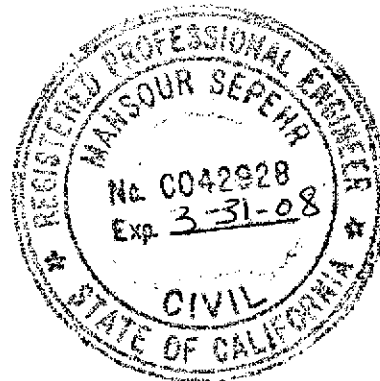


Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist

Enclosure

cc: Mr. Abolghassem Razi w/report enclosure
Tony's Express Auto Service

Mr. Vince Tong w/report enclosure
Traction International



March 28, 2006

Mr. Jerry Wickham
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **STID#3337** Second Quarter 2006 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on April 6 & 7, 2006. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 734-6400.

Sincerely,

Tony Perini
Tony Perini
Senior Project Engineer

cc: Mr. Abolghassem Razi

2006 MAR 29 PM 1:27

RO 265

Wickham, Jerry, Env. Health

From: Elena Manzo [emanzo@somaenv.com]
Sent: Wednesday, March 08, 2006 2:34 PM
To: Wickham, Jerry, Env. Health
Subject: Re: Q1 2006 3609 International Blvd RO00265 (SOMA)

Dear Mr. Wickham,

Thank you very much for your letter dated March 3, 2006. I truly apologize for any inconvenience. I was under the impression that I had uploaded Q1 2006 Groundwater Monitoring Report for 3609 International Blvd, Oakland to the Geotracker as well as Alameda County FTP site. A QA/QC system is being put in place to prevent the incident occurring in the future; meanwhile I re-uploaded the above report to FTP site.

Please do not hesitate to call me if you have any questions.

Sincerely,

Elena Manzo
925-734-6400

3/8/2006

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

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

March 3, 2006

Mr. Mansour Sepehr
SOMA Environmental, Inc.
6620 Owens Drive,
Pleasanton, CA 94588-3334

Subject: Fuel Leak Case N [REDACTED] ny's Express Auto Services, 3609 International Blvd.,
Oakland, CA – Report Submitted to Alameda County FTP Site

Dear Mr. Sepehr:

You submitted a one-page letter dated February 8, 2006, indicating that the report entitled, "First Quarter 2006 Groundwater Monitoring and Remediation System Operation Report," had been uploaded to the State of California's Geotracker database for my review. To date, the report has not been uploaded to Alameda County's FTP site. Please note that submittal of documents to the Geotracker database does not fulfill the requirement to upload electronic reports to the Alameda County FTP site. Therefore, please upload the "First Quarter 2006 Groundwater Monitoring and Remediation System Operation Report," and all future reports to the Alameda County FTP site as outlined in the following discussion of "Electronic Submittal of Reports," and the enclosed, "Electronic Report Upload (ftp) Instructions."

ELECTRONIC SUBMITTAL OF REPORTS

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

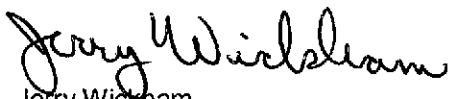
Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents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

Mr. Mansour Sepehr
March 3, 2006
Page 2

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 jerry.wickham@acgov.org.

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

R0265



Alameda County
ENVIRONMENTAL ENGINEERING, INC
Owens Drive, Suite A • Pleasanton, CA 94588-3334
(925) 734-6400 • FAX (925) 734-6401

FEB 14 2006
Environmental Health

February 8, 2006

Mr. Jerry Wickham
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: **STD#3337**
Site Address: 3609 International Blvd., Oakland, California

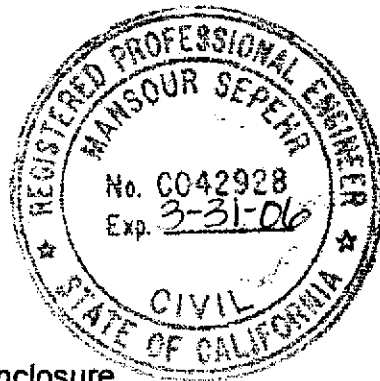
Dear Mr. Wickham:

SOMA's "First Quarter 2006 Groundwater Monitoring and Remediation System Operation Report" for the subject property has been uploaded to the State's GeoTracker database for your review.

Thank you for your time in reviewing our report. If you have any questions or comments, please call me at (925) 734-6400.

Sincerely,

Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist



Enclosure

cc: Mr. Abolghassem Razi w/report enclosure
Tony's Express Auto Service

Mr. Vince Tong w/report enclosure
Traction International

Wickham, Jerry, Env. Health

From: Wickham, Jerry, Env. Health
Sent: Thursday, January 26, 2006 5:10 PM
To: Mansour Sepehr (msepehr@somaenv.com)
Subject: RO0000265 Tony's Express Auto Service, 3609 International, Oakland

Mansour,

Based on your request for an extension, the schedule for system start-up for the proposed air sparging system is extended 60 days to March 17, 2006. A report on the system start up should be included in the quarterly monitoring report following start up.

Regards,

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

January 23, 2006

Mr. Jerry Wickham
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: Extension for Interim Groundwater Remediation at
Tony's Express Auto Service
3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

SOMA is submitting this letter to request an extension for the installation of the air sparge system. In November 2005, SOMA oversaw the installation of five air sparge wells and three vapor extraction wells. The air sparging technology should reduce a large mass of the impacted plume in the region of the UST cavity.

The initial system start-up date was scheduled for January 17, 2006. However, due to unforeseen difficulties with SOMA's previous subcontractor, coordinating the installation of the system has been tedious and time delaying. These difficulties were clearly not expected.

SOMA is currently in the process of coordinating with another subcontractor for the installation of this remedial system. SOMA appreciates your patience with this matter. Further information will be provided to you once the system becomes operational. Meanwhile, please do not hesitate to call Mansour Sepehr or myself at (925) 734-6400, if you have any questions or comments.

Sincerely,

Tony Perini
Tony Perini
Senior Project Engineer

cc: Mr. Abolghessem Razi, site owner

December 19, 2005

Mr. Jerry Wickham
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Alameda County
DEC 21 2005
Environmental Services

Re: **STID#3337** First Quarter 2006 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on January 3rd & 4th, 2006. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified at least 72 hours prior to the monitoring event.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 734-6400.

Sincerely,



Tony Perini
Senior Project Engineer

cc: Mr. Abolghassem Razi



6620 Owens Drive, Suite A, Pleasanton, CA 94588
TEL (925) 734-6400 FAX (925) 734-6401

December 14, 2005

Alameda County
DEC 29 2005

Ms. Molly Ong
East Bay Municipal Utility District
EDMUD - Mail Slot #702
P. O. Box 24055
Oakland, CA 94623-1055

Re: 3609 International Boulevard, Oakland, California 94601
Wastewater Discharge Permit No. 504-27421

Dear Ms. Ong:

As you requested, enclosed is SOMA's "Semi-Annual Technical Report: Treatment System Discharge to EBMUD Sewer for Permit No. 504-27421 from June 2005 to November 2005" for the subject site. This report has also been uploaded to the State's GeoTracker database. Please let us know, if you would not like to receive a hard copy in the future.

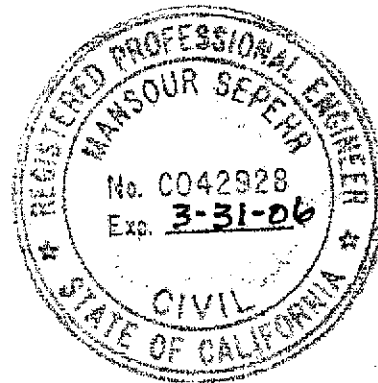
Thank you for your time in reviewing our report. If you have any questions or comments, please call me at (925) 734-6400.

Sincerely,

Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist

Enclosure

cc: Mr. Abolghassem Razi w/enclosure
Mr. Jerry Wickham w/o enclosure ✓
Alameda County Dept. of Env. Health





6620 Owens Drive, Suite A, Pleasanton, CA 94588
TEL (925) 734-6400 FAX (925) 734-6401

October 6, 2005

Mr. Jerry Wickham
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **STID#3337** Fourth Quarter 2005 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Wickham:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on October 13-14, 2005. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified at least 72 hours prior to the monitoring event.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 734-6400.

Sincerely,

A handwritten signature in cursive script that reads "Tony Perini".

Tony Perini
Senior Project Engineer

cc: Mr. Abolghassem Razi

Alameda County
OCT 10 2005
Environmental Health

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

ENVIRONMENTAL HEALTH SERVICES

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

October 6, 2005

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 International Blvd.
Oakland, CA 94601

Subject: Fuel Leak Case No. [REDACTED] 65, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA – Modification to Interim Groundwater Remediation

Dear Mr. Razi:

I have been assigned as case worker for the above referenced site. Please send future correspondence for this site to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Modification to Interim Groundwater Remediation," dated September 27, 2005 and prepared on your behalf by Soma Environmental Engineering, Inc. An ozone sparging system was previously proposed for the site in correspondence dated April 22, 2005. ACEH concurred with the implementation of the ozone sparging system in correspondence dated June 28, 2005. The September 27, 2005 document proposes the use of air sparging instead on ozone sparging due to safety concerns.

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

TECHNICAL COMMENTS

1. **Soil Vapor Extraction Wells.** The proposed air sparging system will inject air using eight air sparging wells as shown on Figure 1 of the September 27, 2005 document. Many of the proposed air sparging wells (AS-1 through AS-8) are outside the area of the existing soil vapor extraction system. The September 27, 2005 proposed modifications indicate that four additional vapor extraction wells may be installed in the vicinity of the sparging wells if excess gases are present in the unsaturated zone. The document does not indicate how excess gases will be monitored in these locations in order to evaluate the need for additional vapor extraction wells. ACEH requests that the proposed soil vapor extraction wells or vapor monitoring points be installed at the proposed locations in order to evaluate whether the existing soil vapor extraction system will provide sufficient capture of off gases from the air sparging system. Please present the results of the air sparging system installation start-up and monitoring of off-gases in the report requested below.

TECHNICAL REPORT REQUEST

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

- **November 15, 2005** – Third Quarter 2005 Groundwater Monitoring and Remediation System Operation Report
- **January 17, 2006** – System Start-up for Proposed Air Sparging System
- **February 15, 2006** – Fourth Quarter 2005 Groundwater Monitoring and Remediation System Operation Report (To Include System Start-up Report and Initial System Monitoring Results)

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Jerry Wickham, ACEH
File



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

Alameda County

SEP 29 2005

Environmental Health

September 27, 2005

Mr. Amir Gholami
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **STID#3337** Fourth Quarter 2005 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Gholami:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on October 13-14, 2005. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified at least 72 hours prior to the monitoring event.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 734-6400.

Sincerely,

Tony Perini
Senior Project Engineer

cc: Mr. Abolghassem Razi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



June 28, 2005

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA, 94601

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

**Subject: Fuel Leak Case # RO0000265 - Tony's Express Auto Services,
3609 E. 14th St., Oakland, CA 94601**

Dear Mr. Razi:

This office has reviewed the "Pilot Test and Design of Ozone System", along with other document, prepared by Soma Environmental Engineering, Inc. dated April 22, 2005, in regard to the above subject site. This case has also been discussed with your consultant at Soma.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

TECHNICAL COMMENTS

A permeability test was performed to determine the suitability of the soil for ozone system installation. Based on the result of this test, Soma has estimated that it would take about three years for CoCs to reach acceptable levels. I concur with your proposal to implement this plan. Additionally, please address the area around MW-1 well due to lower permeability of the soil.

TECHNICAL REPORT REQUEST

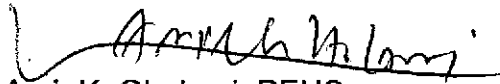
Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

August 27, 2005 workplan implementation report

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Amir K. Gholami". The signature is written in a cursive style with a long horizontal stroke extending to the left.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: D.Drogos, A.Gholami
Mr. M. Sepehr, SOMA Environmental, 6620 Owens Dr. Suite A
Pleasanton, CA 94588

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



June 23, 2005

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA, 94601

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

Subject: Fuel Leak Case # RO0000265 - Tony's Express Auto Services, 3609 E. 14th St., Oakland CA 94601

Dear Mr. Razi:

I have received and reviewed the "Modification to Groundwater Treatment System", along with other document, prepared by Soma Environmental Engineering, Inc. dated June 21, 2005, regarding the above subject site. Additionally I have held discussions with your consultant at SOMA Environmental. Soma is recommending replacement of 2,000 Pound Granulated Activated Carbon (GAC) vessel by Cameron Environmental in order to maintain watertight integrity in the system. The present system has been corroded due to normal wear and tear and is in need of replacement.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

TECHNICAL COMMENTS

- I concur with your proposal to replace the GAC unit as indicated in the above report. Monitoring and maintenance of the system must be performed as necessary.
- Please inform this office of the status of the issues raised in the correspondence dated March 23, 2005.
- Remediation process must be continued as directed in the past.

TECHNICAL REPORT REQUEST

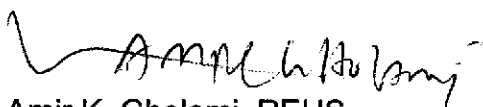
Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

July 25, 2005 workplan implementation report

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

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

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: D.Drogos, **A.Gholami**
Mr. M. Sepehr, SOMA Environmental, 2680 Bishop Dr., Suite 203, San
Ramon CA 94583

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



March 23, 2005

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA, 94601

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

Subject: Fuel Leak Case # RO0000265 - Tony's Express Auto Services, 3609 E. 14th St., Oakland CA 94601

Dear Mr. Razi:

I am in receipt of "Interim Groundwater Remediation", prepared by Soma Environmental Engineering, Inc. dated November 1, 2004, regarding the above referenced site. I have discussed the case with Mr. Sepehr of SOMA Environmental. Per this document and our files, you are asking to modify the existing air sparge/soil vapor extraction treatment system by utilizing ozone sparging technology at the above referenced site.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below:

TECHNICAL COMMENTS

- This office concurs with your assessment in general. The concentrations of the CoCs have been reduced due to air sparge/soil vapor extraction treatment system.
- There still remains up to 22,000 ppb of TPH-g in the vicinity of MW-1 well with high concentrations still around MW-3 and MW-6 wells.
- Benzene concentrations of up to 3,400 ppb and 2,000 ppb remains in the vicinity of MW-3 and MW-1 well.
- MTBE concentrations of 6,900 and 1,100 ppb remains in the vicinity of MW-1 and MW-3 wells respectively.
- This office concurs with your proposal to perform a pilot test to evaluate use of ozone sparging system to further reduce the concentrations of the CoCs.
- You may replace MW-4 with another suitable monitoring well since MW-4 has been found to be damaged per document dated May 27, 2004.
- Please continue with the remediation process as specified previously.

TECHNICAL REPORT REQUEST

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

April 23, 2005 pilot study report

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

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

Sincerely,

A handwritten signature in black ink that reads "Amir K. Gholami". The signature is written in a cursive style and is underlined.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: D.Drogos, A.Gholami
Mr. M. Sepehr, SOMA Environmental, 2680 Bishop Dr., Suite 203, San
Ramon CA 94583



ENVIRONMENTAL ENGINEERING, INC
2680 Bishop Drive • Suite 203 • San Ramon, CA 94583
TEL (925) 244-6600 • FAX (925) 244-6601

Alameda County

APR 28 2004

April 27, 2004

Environmental Health

Mr. Amir Gholami
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **STID#3337 Re-Scheduled** Second Quarter 2004 Groundwater Monitoring Event
Site Location: 3609 International Boulevard, Oakland, California

Dear Mr. Gholami:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has **re-scheduled** the second quarter groundwater monitoring event for the subject site to April 29, 2004.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 244-6600.

Sincerely,

Tony Perini
Tony Perini
Project Engineer

cc: Mr. Abolghassem Razi



ENVIRONMENTAL ENGINEERING, INC
2680 Bishop Drive • Suite 203 • San Ramon, CA 94583
TEL (925) 244-6600 • FAX (925) 244-6601

March 31, 2004

Mr. Amir Gholami
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

PO 265
R. G. HAW

Re: **StID#3337** Second Quarter Groundwater Monitoring Event
Site Location: 3609 International Blvd., Oakland, California

Dear Mr. Gholami:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.


SOMA has scheduled to monitor the subject site on April 22, 2004. The monitoring events are conducted quarterly; therefore, the next monitoring event will be approximately 3 months from the date referenced above. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified at least 72 hours prior to the monitoring event.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 244-6600.

Sincerely,

Tony Perini
Project Engineer

cc: Mr. Abolghassem Razi


ENVIRONMENTAL ENGINEERING, INC

2680 Bishop Drive, Suite 203
San Ramon, California 94583
TEL (925) 244-6600 FAX (925) 244-6601

Ro 265

FAX

DATE: *12/10/03* PH# *707-888-1111*
FAX# *510-337-9335*

TO: *Amir Gholami*

COMPANY: *Alameda County Health Services* ^{*Environmental*}

FROM: *TONY PERINI*

SUBJECT: *Conversion of pneumatic system to electrical system at 3609 International Blvd, Oakland*

NUMBER OF PAGES INCLUDING COVER:

- Urgent Please Review Please Comment Please Reply



ENVIRONMENTAL ENGINEERING, INC
2680 Bishop Drive • Suite 203 • San Ramon, CA 94583
TEL (925) 244-6600 • FAX (925) 244-6601

November 11, 2003

Mr. Amir Gholami
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Request for Treatment System Modification
StID#3337
Site Address: 3609 International Blvd, Oakland, California

Dear Mr. Gholami:

This letter is being submitted by SOMA Environmental Engineering, Inc. (SOMA) to request your approval to modify the treatment system at the above referenced site. Currently, the groundwater extraction system at the site is pneumatic. SOMA is requesting that the system to be converted to an electrical groundwater extraction system.

In July 2003, to more effectively remediate the area in the vicinity of MW-1, SOMA installed an additional on-site extraction pump in the western French drain riser. Based on the air pressure for operation of the new pump, SOMA installed an additional compressor. Due to the operation of both compressors, the noise level of the groundwater extraction system has become a nuisance to the nearby residents. Therefore, SOMA requests replacing the existing pneumatic system with an electrical system.

The removal and replacement of the pneumatic system by an electrical system will greatly decrease the noise level and also increase the comfort level to the nearby residents.

Thank you very much for your time and/or any suggestions you may have in this matter. Meanwhile, please do not hesitate to call me at (925) 244-6600, if you have any questions or comments.

Sincerely,

Mansour Sepehr, Ph.D., P.E.
Principal Hydrogeologist



November 11, 2003

Mr. Amir Gholami
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Request for Treatment System Modification
StID#3337
Site Address: 3609 International Blvd, Oakland, California

Dear Mr. Gholami:

This letter is being submitted by SOMA Environmental Engineering, Inc. (SOMA) to request your approval to modify the treatment system at the above referenced site. Currently, the groundwater extraction system at the site is pneumatic. SOMA is requesting that the system to be converted to an electrical groundwater extraction system.

In July 2003, to more effectively remediate the area in the vicinity of MW-1, SOMA installed an additional on-site extraction pump in the western French drain riser. Based on the air pressure for operation of the new pump, SOMA installed an additional compressor. Due to the operation of both compressors, the noise level of the groundwater extraction system has become a nuisance to the nearby residents. Therefore, SOMA requests replacing the existing pneumatic system with an electrical system.

The removal and replacement of the pneumatic system by an electrical system will greatly decrease the noise level and also increase the comfort level to the nearby residents.

Thank you very much for your time and/or any suggestions you may have in this matter. Meanwhile, please do not hesitate to call me at (925) 244-6600, if you have any questions or comments.

Sincerely,



Mansour Sepehr, Ph.D., P.E.
Principal Hydrogeologist

November 11, 2003

Mr. Amir Gholami
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Alameda County

NOV 14 2003

Re: Request for Treatment System Modification
StID#3337
Site Address: 3609 International Blvd, Oakland, California

Environmental Health

Dear Mr. Gholami:

This letter is being submitted by SOMA Environmental Engineering, Inc. (SOMA) to request your approval to modify the treatment system at the above referenced site. Currently, the groundwater extraction system at the site is pneumatic. SOMA is requesting that the system to be converted to an electrical groundwater extraction system.

In July 2003, to more effectively remediate the area in the vicinity of MW-1, SOMA installed an additional on-site extraction pump in the western French drain riser. Based on the air pressure for operation of the new pump, SOMA installed an additional compressor. Due to the operation of both compressors, the noise level of the groundwater extraction system has become a nuisance to the nearby residents. Therefore, SOMA requests replacing the existing pneumatic system with an electrical system.

The removal and replacement of the pneumatic system by an electrical system will greatly decrease the noise level and also increase the comfort level to the nearby residents.

Thank you very much for your time and/or any suggestions you may have in this matter. Meanwhile, please do not hesitate to call me at (925) 244-6600, if you have any questions or comments.

Sincerely,



Mansour Sepehr, Ph.D., P.E.
Principal Hydrogeologist

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

July 24, 2000
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA, 94601

**Re: Reporting Requirements for Tony's Express Auto Services, 3609 E. 14th St.,
Oakland CA 94601**

Dear Mr. Razi:

This letter serves to clarify the reporting requirements for the subsurface investigation occurring at the above site. I have spoke with Mr. Mansour Sepehr of SOMA and have been informed that they are initiating the air sparge/soil vapor extraction treatment system. He wanted to know our office's reporting requirements. I have informed him that he may include all pertinent information in his quarterly monitoring reports. Such information should include:

- Number of days of operation during the reporting quarter
- An evaluation of the effectiveness of the remediation
- An estimate of the total amount of petroleum mass removed during the reporting period and total overall amount since start of operation of system
- Soil vapor analytical results, pre and post treatment
- Frequency of changing activated carbon canister etc.

It also appears that the trench/groundwater extraction treatment system is having a positive affect in reducing dissolved total petroleum hydrocarbon concentrations as well as drawing the contaminant plume back towards your own site.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sepehr, SOMA Environmental, 2680 Bishop Dr., Suite 203, San Ramon CA 94583
Mr. M. Owens, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

SVErep3609E14



2680 Bishop Drive, Suite 203
San Ramon, California 94583
TEL (925) 244-6600
FAX (925) 244-6601

FAX TRANSMITTAL

DATE: 7/24/00 FAX# 510-337-9335

TO: Barney Chen

COMPANY: Alameda County

FROM: Mansour Joseph

SUBJECT: Request for monitoring VES System

NUMBER OF PAGES INCLUDING COVER: 2

MESSAGE:

Barney:

*As we discussed please take a look
at this and let me know if you have any
other requests specially for reporting.*

*Thanks
Mansour*

Summary of Monitoring Requirements for Vapor Extraction System at Tony's Express Auto Service, Oakland, California

In compliance with the permit issued by the Bay Area Air Quality Management District (BAAQMD) for the Vapor Extraction System (VES) installed at Tony's Express Auto Service in Oakland, California, SOMA Environmental Engineering, Inc. will take the following steps:

- 1) Daily monitoring of organic carbon concentrations will be performed using a Photoionization Detector (PID). Measurements will be made at the inlet to the second to last GAC in series, at the inlet to the last GAC in series, and at the outlet to the last GAC in series. These measurements will be used to calculate the frequency of carbon change-out required.
- 2) The second to last GAC will be changed out upon detection at its outlet of organic carbon in excess of 10% of its inlet stream, or 10 ppmv (measured as C6).
- 3) The last GAC will be changed out upon detection at its outlet of 10 ppmv or greater organic carbon (measured as C6).
- 4) Monthly sampling of the vapor stream will be made at the same points as daily PID testing. Samples will be collected in tedlar bags and delivered to a certified laboratory for analysis.
- 5) Based on calculations from lab data, efficiency of the abatement system shall be maintained at or above 97% by weight.
- 6) Also based on lab data, benzene emissions to the atmosphere shall not exceed 0.04 lb/day.



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
2014 T Street • Sacramento, California 95814 • (916) 227-0743
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustcf>

Graef Davis
Governor

February 16, 2000

ST10 3337
BC

Abolghassem Razi
3609 International Blvd
Oakland, CA 94601

PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 7912,
SITE ADDRESS: 3609 INTERNATIONAL BLVD, OAKLAND, CA 94601

I have reviewed your request, received on January 7, 2000, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the July 20, 1999, SOMA Environmental workplan approved by the Alameda County EHD (County) in their July 29, 1999 letter, is **\$85,790.00**; see the table below for a breakdown of costs. The scope of work for this pre-approval includes operation and maintenance of the groundwater treatment system and quarterly groundwater monitoring and reporting.

Be aware that this pre-approval does not constitute a decision on reimbursement: **all reasonable and necessary** corrective action costs for work **directed and approved by the (Regulatory Agency)** will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.

In an effort to expedite your future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we request that the attached budget tracking form be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

***All future costs for corrective action must be approved in writing by Fund staff.
Future costs for corrective action must meet the requirements of
Article 11, Chapter 16, Underground Storage Tank Regulations.***

COST PRE-APPROVAL BREAKDOWN

Task	Amount Pre-Approved	Comments
1. Effluent sampling and analysis	\$10,050.00	Includes 18 sampling events and 5 reports. Field labor @ \$70/hr, vehicle @ .35/mi.
2. Maintenance	\$54,965.00	Includes weekly system inspection, EBMUD monitoring, capacity fees, disposal charge and permit fee. Assume GAC change out 7 times. Field labor @ \$70/hr, vehicle @ 0.35/mi.
3a. Groundwater monitoring - analysis	\$7,500.00	5 sampling events, 12 wells @ \$125/ea
3b. Groundwater sampling - field labor	\$5,775.00	5 sampling events, 20 hrs each @ \$70/hr, vehicle @ 0.35/mi.
3c. Groundwater Monitoring - reporting	\$7,500.00	5 reports @ \$1,500 each
TOTAL PRE-APPROVED	\$85,790.00	

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- It is my opinion that it is unnecessary to obtain three bids for this scope of work; the Fund's three bid requirement is waived for this scope of work.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the SOMA Environmental proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated December 30, 1999 by SOMA Environmental for conducting the work approved by the County for implementing the July 20, 1999, SOMA Environmental workplan.

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

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

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

Please call if you have any questions; I can be reached at (916) 227-0743.

Sincerely,



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

Enclosure

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

January 5, 2000
StID # 3337

Mr. Abolghassem Razi
3609 International Blvd.
Oakland CA 94601

**Re: Groundwater Monitoring at Tony's Express Auto Service, 3609 International Blvd.,
Oakland CA 94601**

Dear Mr. Razi:

It has come to our office's attention that there have been questions regarding the current monitoring schedule for the eleven (11) on and off-site wells connected with this site. I have reviewed the past monitoring results and it appears that you should continue with the quarterly groundwater schedule for these wells. Although recently lower concentrations may have been found in some of the wells, a pattern has not yet been shown which would warrant the discontinuing of monitoring.

As further monitoring occurs, you may have your consultant recommend a change in monitoring to either less number of wells or to a less frequent schedule should the results support.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sepehr, SOMA Environmental Engineering, 2680 Bishop Drive, Suite 203,
San Ramon, CA 94583

Mr. K. Kyriacou, SWRCB Cleanup Fund, 2014 T St., Sacramento CA 95814

Mon3609ntBlvd



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
2014 T Street • Sacramento, California 95814 • (916) 227-7887
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustcf>

Gray Davis
Governor

December 20, 1999

Abolghassem Razi
3609 14th St E
Oakland, CA 94601

3331

PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 007912,
SITE ADDRESS: 3609 14TH ST E, OAKLAND, CA 94601

I have reviewed your request, received on November 29, 1999, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

Your pre-approval request submittal is incomplete and cannot be processed. The following marked items were not included in your submittal and must be submitted before review and determination will be made by Fund staff..

- A completed cost pre-approval request form**; signed by the claimant or an authorized representative. A consulting engineer or contractor performing, or proposing to conduct corrective action work at your site, cannot act as an authorized representative due to a potential conflict of interest. An authorized representative form must be on file or submitted with your request.
- A complete and signed copy of the proposed work plan, corrective action plan, or any other work plan**; plan(s) must describe in sufficient and appropriate detail the proposed corrective action work, per the requirements of Article 11, Chapter 16 of the California Underground Storage Tank Regulations.
- A signed copy of the appropriate lead regulatory oversight agency approval letter for the proposed plan.**
- A complete copy of the Request for Bids (RFB), of all firms invited to bid.** The RFB should include a *blank* cost proposal breakdown, which reflects the major tasks of the proposed work and breakdowns of staff classification, labor rate and number of hours per task.
- Complete copies of all bids and other correspondence submitted in response to the RFB.**

- If a minimum of 3 qualified/responsive bids are not submitted, then a cover letter requesting and justifying a waiver of the three-bid minimum requirement for the specific proposed work.** The Fund's regulations require that you obtain at least three bids from qualified firms for all necessary corrective action work. A waiver of the 3 bid requirement may be granted by the Fund if you request a waiver, provide reasonable justification as to why 3 bids are unnecessary, unreasonable or impossible to comply with, and the Fund staff agrees that it is not necessary to obtain additional bids.
- The selected detailed cost proposal in the format specified in the RFB.** All cost proposals should include the *completed* cost proposal breakdown, with task subtotals and a grand total cost for the entire scope of work.

The legislation governing the Fund requires that the Fund assist you in procuring contractor and consultant services for corrective action. If you need assistance to procure corrective action services or if you have any questions, don't hesitate to call me. I can be reached at (916) 227-7887.

Sincerely,



Kyriacos Kyriacou, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

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

99 DEC 22 PM 4: 17

ENVIRONMENTAL
PROTECTION

December 1, 1999

3337

Mr. Barney M. Chan
Alameda County
Department of Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Claim No. 7912
Site Address: 3609 International Blvd., Oakland, California

Dear Mr. Chan:

A copy of the Fourth Quarter 1999 Groundwater Monitoring report for the subject property is enclosed.

Thank you for your time in reviewing our report. If you have any questions or comments, please call me at (925) 244-6600.

Sincerely,



Mansour Sepehr, Ph.D., P.E.
Principal Hydrogeologist

MS/jb

Enclosures

cc: Mr. Abolghassem Razi
Tony's Express Auto Service

ENVIRONMENTAL
PROTECTION
99 DEC -3 PM 3:09

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

November 15, 1999
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Service
3609 E. 14th St.
Oakland CA 94601

Re: Vapor Extraction Test Report for 3609 E. 14th St., Oakland CA 94601

Dear Mr. Razi:

Our office has received and reviewed the SOMA Environmental Engineering (SOMA) Vapor Extraction Test performed at the above referenced site. It was noted during this test that the existing vapor extraction and monitoring wells are not optimized for vapor extraction. Significant portions of these wells are or are expected to be beneath groundwater during the year. The existing vapor wells are screened to 15', below the anticipated highest groundwater level at the site. Under these conditions, significant groundwater would interfere with the proposed vapor extraction remediation.

Since vapor extraction from vadose and shallow horizontal wells would be expected to be effective as shown in the vapor extraction test, our office concurs with SOMA's recommendation to install new shallow vadose wells to a depth of 8-9' in the same general location of the existing deeper vadose wells.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sepehr, SOMA Environmental Engineering Inc., 2680 Bishop Drive, Suite 203,
San Ramon, CA 94583

Mr. M. Owens, SWRCB UST Cleanup Fund, 2014 T St., Suite 130, P.O. Box 944212,
Sacramento, CA 94244-2120

VEwells3609

November 9, 1999

Mr. Barney Chan
Hazardous Material Specialist
Alameda County Health Care Services
Environmental Health Services
1131 Harbor Bay Parkway
Suite 250
Alameda, California

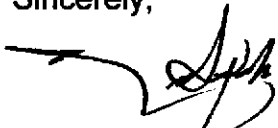
Subject: SOMA Environmental Report Entitled " Conducting Vapor
Extraction Test at Tony's Express Auto Service, 3609 International
Blvd., Oakland, California

Dear Barney:

A copy of report entitled "Conducting Vapor Extraction Test at Tony's Express
Auto Service, 3609 International Blvd, Oakland, California" for your review and
comment is enclosed. The results of this test will be used to design an air
sparging unit at the subject property.

Thank you very much for your time and regulatory over-sight on this project.
Meanwhile please do not hesitate to call me or Bryce Scofield, Project Engineer
at (925) 244-6600 if you have any questions or comments.

Sincerely,



Mansour Sepehr, Ph.D., P.E
Principal Hydrogeologist

cc: Mr. Abolghassem Razi Tony's Express Auto Services
Mr. Mark Owens, UST Fund

ENVIRONMENTAL
PROTECTION
99 NOV 10 PM 2:29



State Water Resources Control Board



Division of Clean Water Programs

2014 T Street • Sacramento, California 95814 • (916) 227-
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustcf>

Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

H 3737

November 3, 1999

Mr. Abolghassem Razi
3609 International Boulevard
Oakland, CA 94601

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM # 7912
SITE ADDRESS: 3609 INTERNATIONAL BOULEVARD, OAKLAND**

99 NOV -5 PM 3:37
ENVIRONMENTAL
PROTECTION

I have reviewed your request, received on August 6, 1999 for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective actions costs.

With the following provisions, the **total cost pre-approved** as eligible for reimbursement for vapor testing and modeling, is **\$6,550.00**. The cost proposal for this work by Soma is approved for eligible costs as submitted.

*Be aware that this pre-approval does not constitute a decision on reimbursement: **all reasonable and necessary** corrective action costs for work directed and approved by the local regulator will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.*

*All future costs for corrective action must be approved in writing by Fund staff.
Future costs for corrective action must meet the requirements of
Article 11, Chapter 16, Underground Storage Tank Regulations.*

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to Alameda County Health Care Services (ACHCS).
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the Soma proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract.

California Environmental Protection Agency

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all future necessary corrective action work.

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

- *subcontractor invoices (includes lab invoices)*
- *technical reports, when available, and*
- *applicable correspondence from ACHCS.*

Please call if you have any questions; I can be reached at (916) 227-7883.

Sincerely,



Mark Owens, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Barney Chan, Alameda Health Care Services, Alameda



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

July 12, 1999
StID # 3337

Mr. Abolghassem Razi
3609 International Boulevard
Oakland CA 94601

**Re: Corrective Action Plan (CAP) for 3609 International Boulevard, Oakland CA 94601,
Tony's Express Auto**

Dear Mr. Razi:

Our office has received the **Second Quarter 1999 Groundwater Monitoring Report and the Corrective Action Plan** for the above site as prepared by SOMA Environmental Engineering, Inc. (SOMA). The groundwater monitoring report continues to show the presence of an elevated gasoline, BTEX and MTBE plume, which has migrated beyond the property boundaries. These results support the need to perform remediation to reduce the mass and concentrations of the chemical contaminants.

The submitted Corrective Action Plan evaluates several soil and groundwater treatment alternatives based upon effectiveness, implementability and cost. It has determined that the best alternative for soil is soil vapor extraction with air sparging and the best alternative for groundwater is groundwater extraction from a French drain (interceptor trench). The CAP also recommends the treatment of the extracted vapor and groundwater with granulated activated charcoal (GAC) to absorb the extracted contaminants. Our office agrees with this remedial approach. You may proceed with the design, permitting and implementation of this remediation. Please update your progress in all forthcoming monitoring reports.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sephr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203
San Ramon, CA 94583

Mr. E. Nichol, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

CAPap3609

Mtzw/ M. Sepchr, T. Razi & M.C.

6/29/99 # 3387

- = ~~letter~~ agreeing that ~~the~~ remed. require
- = Need letter req wp. for implement @ AP
- = monitor cleanup levels -
& future Tier 2 RBCA w/ site specific
SST's. collect data in future.

mass = mass of soil x ave soil
pethyd conc

$$\frac{5 \text{ mg}}{\text{kg}} \times 1706 \text{ ft}^3 \times \frac{1.46 \text{ g}}{\text{cm}^3} \times \left(\frac{30 \text{ cm}}{\text{ft}} \right)^3 \times$$
$$\frac{.005 \text{ mg}}{\text{g}} \times \frac{10^{-3} \text{ g}}{\text{mg}}$$

$$5 \times 10^{-6} \times 1706 \times 1.46 \times (30)^3$$

$$5 \times 10^{-6} \times 1.706 \times 10^3 \times 1.46 \times 2.7 \times 10^4$$

$$= 33.6 \times 10^1$$
$$= 336 \text{ g}$$

(Ijaz)
TAX 395 0536
916

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

June 29, 1999
StID # 3337

Mr. Abolghassem Razi
3609 International Boulevard (E. 14th St.)
Oakland CA 94601

Re: Further Site Characterization and RBCA Evaluation for Tony's Auto Express, 3609 International Boulevard, Oakland CA 94601

Dear Mr. Razi:

This letter serves to summarize the meeting at our office today. Present were Mr. Mansour Sepehr of SOMA Environmental Engineering, Ms. Madhulla Logan, you and me. We discussed the findings of the above report and the justification for the need to perform active remediation at this site. SOMA used the Regional Water Board's December 8, 1995 "low risk site" document to determine whether further investigation or remediation is necessary. Additional remediation is concluded to be necessary based upon the following:

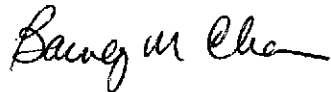
- Estimation of the residual petroleum mass at this site was done which indicates that over 2,200 pounds remains. Clearly, the source of the contamination has not been adequately removed.
- The results of the chemical transport modeling indicates the contaminant plume is expanding. This is further supported by plots of historical benzene concentrations in specific wells.
- As you are aware, SOMA attempted to install an off-site monitoring well on BART property to further delineate the hydrocarbon plume but, as yet, has not been successful. Therefore, this site has not been adequately characterized.
- Based upon the ASTM-RBCA study performed by SOMA, the current soil and groundwater concentrations pose a significant health risk to on-site workers and off-site residents via inhalation of vapors to indoor air. Ms. Logan of our office offered a few recommendations to modify the Tier 2 RBCA, however, our office concurs that the site specific target levels (SSTLs) would be exceeded even using the recommended modifications. An addendum to your Tier 2 RBCA reflecting such items as 10E-5 acceptable risk, 0.01 crack factor and site specific soil parameters should be submitted in the future as you get closer to reaching the calculated SSTLs and meeting the "low risk" requirements.

Your consultant has recommended the installation of a groundwater extraction trench in addition to soil vapor extraction for this site. He has also illustrated the expected result of this remediation through modeling. Please submit a feasibility study to support this remedial approach and a work plan with the specifics of your proposed corrective action **within 45 days or by August 16, 1999.**

Mr. A. Razi
3609 International Boulevard
StID # 3337
June 29, 1999
Page 2.

You may contact me at (510) 567-6765 or Ms. Logan at (510) 567-6764, if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203,
San Ramon, CA 94583

Mr. E. Nichol, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Fswprq3609



Winston H. Hickox
Secretary for
Environmental
Protection

State Water Resources Control Board

Division of Clean Water Programs

2014 T Street • Sacramento, California 95814 • (916) 227-
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustcf>



Gray Davis
Governor

3337

June 7, 1999

Mr. Abolghassem Razi
3609 International Boulevard
Oakland, CA 94601

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 7912,
SITE ADDRESS: 3609 INTERNATIONAL BOULEVARD, OAKLAND**

I have reviewed your request, received on May 28, 1999 for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective actions costs.

With the following provisions, the **total cost pre-approved** as eligible for reimbursement is **\$36,085.00**. The cost proposal for this work by Soma is approved for eligible costs as submitted.

*Be aware that this pre-approval does not constitute a decision on reimbursement: **all reasonable and necessary corrective action costs for work directed and approved by the local regulator will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.***

***All future costs for corrective action must be approved in writing by Fund staff.
Future costs for corrective action must meet the requirements of
Article 11, Chapter 16, Underground Storage Tank Regulations.***

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to ACHCS.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the Soma proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all future necessary corrective action work. The

California Environmental Protection Agency

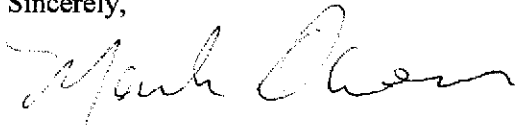
legislation governing the Fund requires that the Fund assist you in procuring contractor and consultant services for corrective action. If you need assistance in contracting for corrective action services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *To make this easier, insure that your consultant prepares his invoices to match the format of the original estimate, and provides reasonable explanations for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- *subcontractor invoices (includes lab invoices)*
- *technical reports, when available, and*
- *applicable correspondence from ACHCS.*

Please call if you have any questions; I can be reached at (916) 227-7883.

Sincerely,



Mark Owens, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Barney Chan, Alameda County Health Care Services, Alameda



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 11, 1999
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

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

**Re: Work Plan for Conducting Subsurface Investigation at Tony's Express Auto Services,
3609 International Boulevard, Oakland CA 94601**

Dear Mr. Razi:

Our office has received and reviewed the April 29, 1999 work plan referenced above as prepared by Mr. Mansour Sepehr of SOMA Environmental Engineering, Inc. (SOMA). This work plan follows the April 21, 1999 meeting with you and Mr. Sepehr and my concurrence to re-evaluate past data and the current remediation approach for this site. This is justified given the relative ineffectiveness of the current approach and the potential health risk associated with the contaminant plume. It appears that the plume has expanded well beyond the property boundary and there may be an unacceptable human health risk to off-site residents.

SOMA recommends the following actions:

- They will compile soil and groundwater data and generate a three dimensional figure indicating the total chemical mass which remains in these media. To further delineate the groundwater plume, SOMA proposes to install two additional down-gradient monitoring wells. Upon discussion with SOMA, we agreed to install one well on the south side of E. 12th St. first before deciding if another well is necessary.
- They will follow the December 8, 1995 guidance document from the State Water Resources Control Board for determining whether a site is a low risk fuel site or not. To complete site characterization, the additional monitoring well is proposed. To determine whether the plume is expanding or not, SOMA will conduct groundwater flow and chemical transport modeling. However to do this, SOMA will need to verify the hydraulic conductivity by performing a pump test or several slug tests. SOMA will conduct a sensitive receptor survey within a ½ mile radius. These results will be used in their independent risk assessment using the ASTM-RBCA approach.
- Should the above analysis indicate that the above site is not of low risk, as is expected, SOMA will prepare a Corrective Action Plan (CAP) which evaluates the various remedial alternatives including the current one.

Our office agrees with this approach in handling this site. Please inform our office prior to any field work. I may be reached at (510) 567-6765.

Mr. A. Razi
StID # 3337
3609 E. 14th St., Oakland CA 94601
May 11, 1999
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203,
San Ramon, CA 094583

Mr. E. Nichol, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Wpap3609E14

#3337

May 7 1999

Mr. Barney Chan
Hazardous Waste Officer
Alameda County Health Care Services
Environmental Health Services
1101 Harbor Bay Parkway
Suite 200
Alameda, California 94602

Subject: Tony's Express Auto Services, 3609 International Blvd., Oakland
CA 94601, Landowner Notification and participation requirements

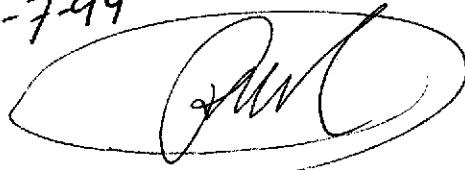
To: Mr. Chan

In accordance with the section 25297.15 (a) of Chapter 6.5 of the California
Safety Code (6poig jassem Razi), certify that I am the owner of the site
at the site

Signature,

Mr. Abdighassem Razi
Tony's Express Auto Services

5-7-99



TONY'S EXPRESS
AUTO SERVICE CENTER
3609 E. 14th STREET
OAKLAND, CA 94601
(510) 261-4444

99 MAY 10 PM 3:15

ENVIRONMENTAL
PROTECTION

April 28, 1999

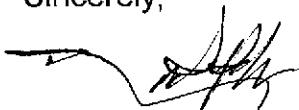
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Re: Approval of Installation of Vapor Extraction Unit at
Tony's Express Auto Service, 3609 East 14th Street, Oakland, CA

Dear Mr. Cave:

Following our telephone conversation on April 28, 1999, I am writing to request that you withhold a previous consultant request for installation of vapor extraction unit (VES) at this site. The site has not been thoroughly investigated to conclude that the VES system is the best remedial option for soil and water clean up. After careful evaluation of the existing information and proposed future field investigations, you will be requested to reactivate our application.

Sincerely,



Mansour Sepehr, Ph.D., P.E.
Principal Hydrogeologist

cc: Mr. Barney Chan ✓
Alameda County
Environmental Health Services

Mr. Abolghassem Razi
Tony's Express Auto Service

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



April 21, 1999
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

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

Re: Request for Technical Report for Tony's Express Auto Services, 3609 E. 14th St., Oakland CA 94601

Dear Mr. Razi:

This letter serves to document our meeting today at the County offices. In this meeting, we discussed the above site with your new consultant, Mr. Mansour Sepehr, of SOMA Environmental Engineering, Inc. Mr. Sepehr provided his interpretation of the prior work that had been performed at the site.

One item brought up was the wide variability in the hydraulic conductivity determined in Western Geo-Engineers' slug test for the various wells. These values ranged from 0.4 to 10 ft/day. It is apparent that there must be some areas with high hydraulic conductivity that would be amenable to groundwater extraction.

Another item discussed was the health risk of off-site residents to the benzene in groundwater. Western Geo-Engineers Tier 2 risk assessment confirmed a potential health risk to off-site residents. This is of significance since off-site residences have already been built above the contaminant plume. Mr. Sepehr question whether the appropriate remediation approach is the proposed enhanced bio-remediation through air sparging and nutrient addition. In addition, based upon his analysis of residual soil contamination, the proposed vapor extraction system would also have limited success. Another inconsistency was the apparent lack of correlation between the dissolved oxygen content and groundwater contaminant concentration. Mr. Sepehr recommended a sampling method, which may yield more consistent representative results.

Our office recognizes the relative lack of success in remediation at the site and the potential high risk to off-site residents. Priority must be given to contract and prevent the migration of the contaminant plume. It will also be necessary delineate the extent of plume with the installation of additional monitoring wells. Our office agrees with the following investigation approach:

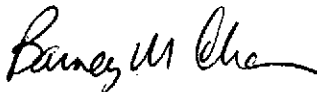
- Please have your consultant review the Tier 2 RBCA provided by Western Geo-Engineers in their December 30, 1997 report to verify the potential human health risk on and off-site. If necessary, you may have to prepare a revised RBCA.
- Please confirm the hydraulic conductivity at the site. This may be done by reviewing the slug test of Western Geo-Engineers or by performing additional pump tests.
- Based upon the results of the pump test or pump test review, please provide a Corrective Action Plan (CAP) to prevent the migration of off-site contamination and treat the on-site contamination. The CAP should also evaluate the current remedial approach.

Mr. Abolghassem Razi
StID # 3337
3609 E. 14th St., Oakland CA 94601
April 21, 1999
Page 2.

Please provide a work plan to perform the above items **within 30 days or by May 21, 1999**.
Because you are changing consultants, the previously requested work plan and technical information is no longer required.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. M. Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203,
San Ramon, CA 94583

Mr. E. Nichol, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Newrq3609E14

- Risk Assessment
- Modeling
- Expert Witness



Mansour Sepehr, Ph.D., P.E.
President & Principal Hydrogeologist

2680 Bishop Drive • Suite 203 • San Ramon, CA 94583
TEL (925) 244-6600 • FAX (925) 244-6601
E-mail: somaenv@gis.net

Nasi/
Byce

4/21/99

Mts T. Razi & M. Sepehr - SMT

1 - RCRA Tier I

2 - conduct hydraulic testing < sleep
pump

3 - Conduct GW flow modeling to design
GW extn system

3 - CAP - Pump + Treat
at 3 pangs
VES

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



April 2, 1999
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

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

**Re: Subsurface Investigation at Tony's Express Auto Services, 3609 E. 14th St.,
Oakland CA 94601**

Dear Mr. Razi:

This letter comments on the current status of the above site and the conclusions made in Western Geo-Engineers' **October-December 1998 Quarterly Report**. As you are likely aware, the groundwater concentrations of gasoline, BTEX and MTBE have remained elevated and have migrated well beyond the property boundary. The current remediation has not had significant success in reducing contamination at the site. The existing remediation consists of air sparging into MW-3 and the addition of ammonia and phosphate into the wells to encourage natural biodegradation.

In order to enhance the removal and degradation of petroleum constituents at this site, our office requests that you investigate the following actions:

- Consider increasing the number of wells which will be air sparged; and
- Permit and start the vapor extraction system previously proposed and approved.

The conclusions of the Western Geo-Engineers report also proposes to investigate the practicality of performing pump and treat at the site. Typically, pump and treat systems in sites such as this are not cost efficient in removing petroleum. The relatively impermeable soil reduces the effectiveness of this technique. I have spoke with Mr. Butler of Western Geo-Engineers and he has made estimates as to the amount of gasoline remaining in soil and groundwater. Apparently, his calculations indicate that the majority of the gasoline is in the soil, therefore, groundwater extraction, even if feasible, would not be reasonable. Please have Mr. Butler submit copies of these calculations to our office.

Please submit a work plan and the technical information to our office **within 30 days or by May 3, 1999**. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

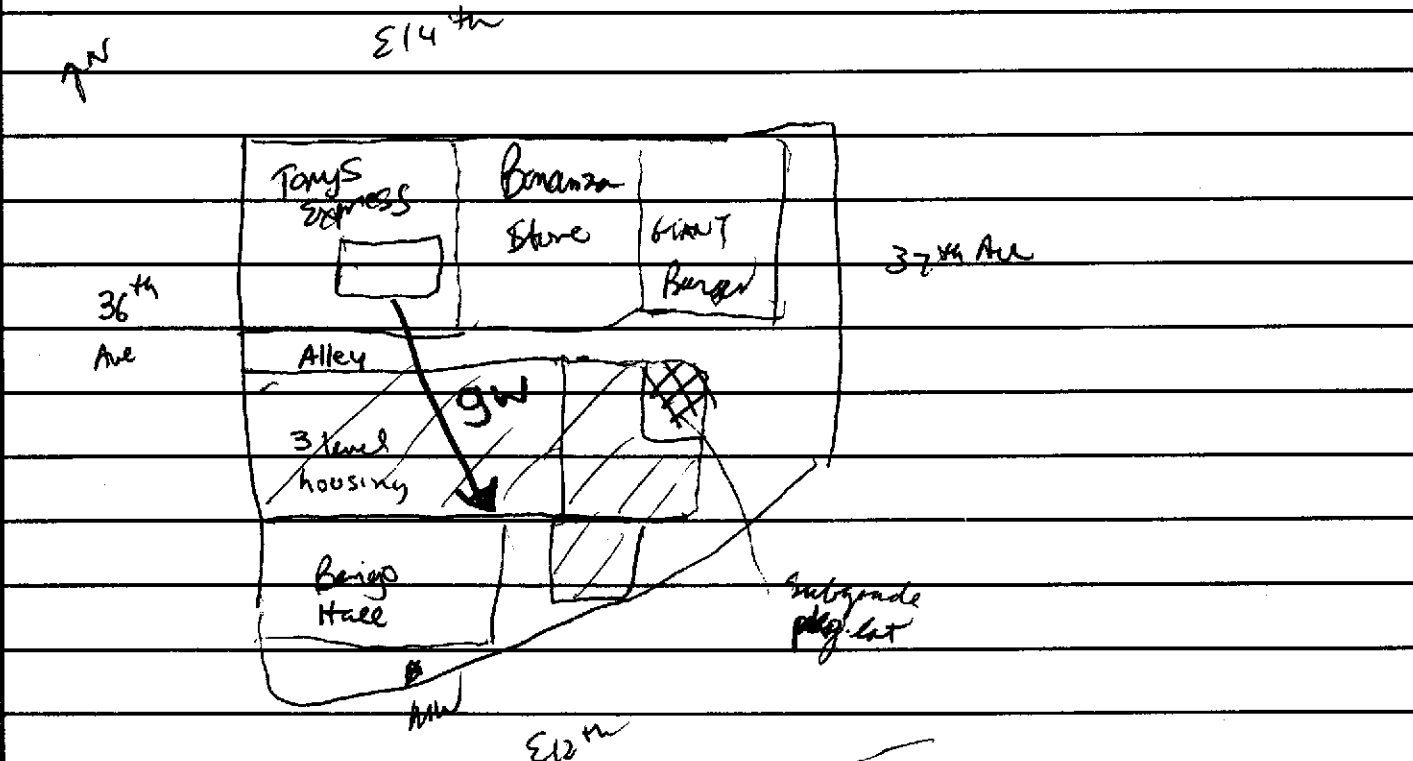
C: B. Chan, files

Mr. R. Butler, Western Geo-Engineers, 1386 East Beamer St., Woodland CA 95776

Tony-update

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

STID #: 3337 FACILITY NAME: Tony's Auto Express 3609 E 14th St 94601 PG. 1 OF 1
 SUPPLEMENTAL FORM



Site visit to observe the presence & location of Spanish Community Housing + subterranean parking lot (B) Housing is above the gas plume, however, the parking lot is not likely. 3 story housing occupies a large hatched area. No signs of decontamination.

BART

PRINT NAME: _____ INSPECTED BY: B Chan
 SIGNATURE: _____ DATE: 3/31/99



WESTERN
GEO-ENGINEERS
CALIF. CONTRACTOR #513857
REGISTERED GEOLOGISTS

386 EAST BEAMER STREET
WOODLAND CA 95776-6003
(530) 668-5300,
FAX (530) 662-0273
Wege@mother.com

FROM: Roy Butler

DATE: 12-9-98

TO: Barney Chan

FAX #: 510 337-9335

TOTAL PAGES
INCLUDING THIS PAGE

2

up dated sheet,

Table 2, ug/l, Gasoline Range Hydrocarbons in Groundwater			
DATE	3/4/98	8/30/98	9/29/98
MW1 Product	sheen	sheen	sheen
MW01, TPHg			
MW01, Benzene			
MW01, Toluene			
MW01, Ethylbenzene			
MW01, Xylene			
MW02, TPHg	51000	25000	2900
MW02, Benzene	4200	2000	290
MW02, Toluene	6000	2000	180
MW02, Ethylbenzene	1600	1300	160
MW02, Xylene	8800	4300	360
MW02, MTBE			<0.5
MW03			
MW03, TPHg	150000	33000	83000
MW03, Benzene	7100	2000	35000
MW03, Toluene	9500	1900	8600
MW03, Ethylbenzene	2700	900	2600
MW03, Xylene	12000	4600	1400
MW03, MTBE			450
MW04, TPHg	2000	1700	6200
MW04, Benzene	600	780	910
MW04, Toluene	950	160	77
MW04, Ethylbenzene	100	54	68
MW04, Xylene	500	200	200
MW04, MTBE			18
MW05, TPHg	400	400	270
MW05, Benzene	3	<5	2
MW05, Toluene	<0.5	<5	1
MW05, Ethylbenzene	14	15	3
MW05, Xylene	5	<10	3
MW05, MTBE			<0.5
MW06, Product			sheen
MW06, TPHg	65000	28000	
MW06, Benzene	6100	3100	
MW06, Toluene	11000	4300	
MW06, Ethylbenzene	1800	1300	
MW06, Xylene	9900	4900	
MW06, MTBE			
MW07, Product			
MW07, TPHg	800	620	1800
MW07, Benzene	25	4	1
MW07, Toluene	47	<5	0.6
MW07, Ethylbenzene	22	9	1
MW07, Xylene	76	<10	2
MW07, MTBE			68
MW08, Product			Film
MW08, TPHg	70000	54000	
MW08, Benzene	8400	4600	
MW08, Toluene	3500	2800	
MW08, Ethylbenzene	3700	3500	
MW08, Xylene	11000	7300	
MW08, MTBE			
MW10, TPHg	8000	8900	9900
MW10, Benzene	2600	3700	5400
MW10, Toluene	1200	60	66
MW10, Ethylbenzene	1300	980	970
MW10, Xylene	3400	420	620
MW10, MTBE			2600
MW11, TPHg	1800	1100	170
MW11, Benzene	160	45	7
MW11, Toluene	31	24	0.6
MW11, Ethylbenzene	120	71	4
MW11, Xylene	250	100	9
MW11, MTBE			22



**WESTERN
GEO-ENGINEERS**
CALIF. CONTRACTOR #513857
REGISTERED GEOLOGISTS

1386 EAST BEAMER STREET
WOODLAND CA 95776-6003
(530) 668-5300,
FAX (530) 662-0273
wege@mother.com
www.mother.com/~wege/

November 27, 1998

Mr. Eric Nichol
Pre-Approval Unit
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA. 94244-2120
fax (916) 227-4530

RE: Mr. Abolghassem Razi, Tony's Express Auto Services, 3609 E. 14th Street, Oakland, CA 94601, UST Cleanup Fund Program Claim #007912 .

Dear Mr. Nichol

Western Geo-Engineers (WEGE), on behalf of Mr. Abolghassem Razi, the owner of the property listed above, is requesting pre-approval of costs to fulfill the Alameda County Health concerns addressed in their latest letter of August 25, 1998

Mr. Chan's letter dated August 25, 1998, request the implementation of vapor extraction at this site.

We are requesting pre-approval for the following items, please see enclosed price breakdown for cost and items provided.

One Time Expense	Cost
Permit, install and start up of vapor extraction	\$7,237.00
Weekly Expense	Cost per week.
Weekly monitoring as required by BAAQMD	\$354.25

If you should have any questions about this pre-approval, please do not hesitate to call me at (530) 668-5300.

Thank you,

Roy Butler

Roy Butler
Project Geologist - Western Geo-Engineers

Cc: Mr. Abolghassem Razi (510) 261-4444
Mr. Barney Chan, Alameda County Health (510) 567-6765

Enclosures: August 25, 1998, Letter, Barney Chan, Alameda County, Environmental Health Services
April - June 1998, Quarterly Report.

Cost Estimate, 11/25/98

Tony's Express Auto Services
 3609 E. 14th Street
 Oakland, Ca 94601

Item	rate	units	subtotal	total per task
Vapor Extraction Permit				
task	Unit cost	units	Total	
Fill out BAAQMD permit request, gather material and data for and make usage maps, receptor map	\$70.00	24	\$1,680	
Registered geologist review	\$95.00	1	\$95	
Install unit				
Geologist mob/demob site	\$70.00	3	\$210	
truck mileage	\$0.65	150	\$97.50	
Roton 404 pump	\$1,200.00	1.1	\$1,320	
orifice plate manifold	\$300.00	1	\$300	
Hook up pipe, hoses, fittings, sample ports, ect.	\$200.00	1	\$200	
Cost four 55 gallon carbon canisters, delivery and destruction	\$1,743.50	1	\$1,744	
Install unit	\$70.00	5	\$350	
Start up Source test				
Geologist Collect Vapor samples, influent effluent	\$70.00	2	\$140	
Lab analysis, Vapor TPHg/BTEX	\$83.00	2	\$166	
CO2, vapor samples	\$15.00	2	\$30	
Monitor Equipment PID and Manometer	\$60.00	1	\$60	
Geologist write results of test report	\$70.00	8	\$560	
Registered geologist review	\$95.00	3	\$285	
Total system start up				\$7,237

Weekly monitoring				
truck mileage	\$0.65	60	\$39.00	
Mob/Demob site	\$70.00	1	\$70	
Monitor Equipment PID and Manometer	\$60.00	1	\$60	
Check system, take vapor readings	\$70.00	2	\$140	
Update Report Tables				
Two TPHg/MBTEX samples monthly	\$166.00	0.25	\$42	
One CO2 sample monthly	\$15.00	0.25	\$4	
Total weekly monitoring				\$354.25

Yearly, air monitoring cost	\$354.25	52	\$18,421	\$18,421.00
------------------------------------	-----------------	-----------	-----------------	--------------------

Cost for each				
Replacement Carbon Canisters	436.00	1	\$436	\$436

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

August 25, 1998
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

**Re: Quarterly Report, April-June 1998, Tony's Express Auto Service
3609 E. 14th St., Oakland CA 94601**

Dear Mr. Razi

Our office has received and reviewed the above referenced report prepared by Western Geo-Engineers. The report provides the quarterly groundwater monitoring results for the site along with the results for the analysis of bio-parameters. In addition, this report details the results of the vapor-extraction pilot test performed on the vapor extraction wells and laterals installed at the site.

The analytical results from the monitoring event continue to indicate elevated levels of petroleum hydrocarbon release both on and off-site. There are, however, indications that natural biodegradation is occurring and that the proposed remedial approach will both remove volatile gasoline contamination and also add oxygen to the groundwater to enhance natural bioremediation. Because of the expected dual effect of the vapor extraction system, our office agrees that you should obtain the appropriate permits and initiate the remediation system as soon as possible. Air sparging should also continue because of the relative low levels of oxygen being found in groundwater. Additional nutrients should also be added to maintain optimum levels for bioremediation.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. R. Butler, Western Geo-Engineers, 1386 East Beamer St., Woodland, CA 95776
Mr. E. Nichol, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120

Vap-exTony

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 20, 1998
StID # 3337

Mr. Abolghassem Razi
3609 E. 14th St.
Oakland CA 94601

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

RE: Tony's Express Auto Service, 3609 E. 14th St., Oakland CA 94601

Dear Mr. Razi:

Our office has received and reviewed the January-March 1998 Quarterly Report for the above site as prepared by Western Geo-Engineers. The results of petroleum and bioremediation parameters are consistent with past results. The gasoline and BTEX plume continues to migrate off-site with no apparent decrease or leveling off of concentrations. The analysis of bioremediation indicating parameters confirms, once again, the absence of sufficient oxygen and nutrients. The oxidation reduction potential (ORP) value is negative or a low positive value indicative of a reducing condition in an oxygen deficient condition.

Based on these results, our office approves once again with your consultant's recommendation to add nutrients to wells, install and start air sparging to the groundwater and perform a vapor extraction test pilot test.

We are also aware of the Underground Storage Tank Cleanup Fund's Pre-Approval letter for this work, therefore, this work should be started as soon as possible.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. Roy Butler, Western Geo-Engineers, 1386 East Beamer St.,
Woodland, CA 95776

Sve3609



Cal/EPA

**State Water
Resources
Control Board**

Division of
Clean Water
Programs

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-0151
FAX (916) 227-4530

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

ENVIRONMENTAL
PROTECTION

98 MAY -6 PM 4: 23



Pete Wilson
Governor

May 5, 1998

Mr. Abolghassem Razi
3609 East 14th Street
Oakland, California 94601

PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 7912,
SITE ADDRESS: 3609 East 14th Street, Oakland.

This letter is in response to the Cost Pre-Approval request submitted to the State Water Resources Control Board's (SWRCB) Underground Storage Tank Cleanup Fund (Fund), which was received in this office on April 10, 1998. This request, including the proposal provided by Western Geo-Engineers dated April 8, 1998, has been reviewed, and the following table lists those costs pre-approved by the Fund for eligible corrective action activities.

COST PRE-APPROVAL BREAKDOWN

Task	Amount	Comments
Install Airsparging equipment, and implement air airsparging.	\$5,009.27	
Vapor Extraction Pilot Test	\$11,267	
Nutrient Addition	\$695.70/quarter, four quarter total = \$2782.80	
Quarterly Groundwater Monitoring activities, including all analytical costs.	\$4023.75/quarter, four quarter total = \$16,095	
Quarterly Groundwater Monitoring Report Development	\$1220/quarter, four quarter total = \$4880	
TOTAL COST PREAPPROVED	\$40,034.07	

Be aware that this pre-approval does not constitute a decision on reimbursement: **all reasonable and necessary** corrective action costs for work **directed and approved by the Alameda County Environmental Health Services Agency (ACEHSA)** will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to the ACEHSA.

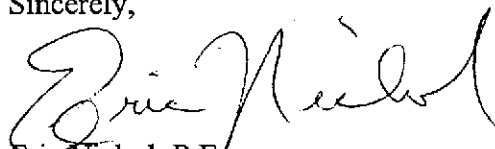
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work..
- Please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract or use any specific contractor. This letter **pre-approves the costs** as presented in Western Geo-Engineers proposal dated April 8, 1998 for conducting the corrective action work.
- A licensed professional must be in responsible charge of all site activities as well as direct the design and implementation of any remedial action. Valid professional registrations are: Registered Civil Engineer (RCE, PE), Registered Geologist (RG), Certified Engineering Geologist (CEG), Certified Hydrogeologist (CH), and Registered Petroleum Engineer (RPE, PE).

Please remember that it is still necessary to submit the actual costs of the work as explained in the Fund's Reimbursement Request Instructions document to confirm that the costs are consistent with this pre-approval before you will be reimbursed. To make this easier, please ensure that your consultant prepares their invoices to match the format of the original estimate, and provides reasonable explanations for any changes made in the scope of work or increases in the costs. Excessive costs for activities, equipment, consultant labor charges, subcontractors, etc. will not be fully reimbursed. Invoices submitted for reimbursement must be broken down by task and present an adequate breakdown of unit costs per activity. When the invoices are submitted you must include copies of all:

- subcontractor invoices,
- technical reports documenting the work for which reimbursement is sought, and
- applicable correspondence from the ACEHSA.

A cost pre-approval form has been enclosed for your use for requesting any future cost pre-approval from the Fund. If you have any questions, I can be reached at (916) 227-0151.

Sincerely,



Eric Nichol, P.E.

Technical Review Unit

Underground Storage Tank Cleanup Fund

enclosure

cc: Mr. Barney Chan
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

March 24, 1998
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

**Re: Bio-Augmentation Work Plan for Tony's Express Auto Service,
3609 E. 14th St., Oakland CA 94601**

Dear Mr. Razi:

Thank you for the submission of the March 17, 1998 work plan prepared by Western Geo-Engineers. The work plan specifically describes what will be done to augment the conditions at this site to enhance bioremediation. To increase the oxygen concentration in groundwater, air will be pumped into monitoring wells MW-2 and MW-3. Because these wells are within the heart of the contamination, the hydrocarbon degraders should increase more quickly, all things being equal. You may need to incorporate additional wells for air sparging if the concentration of oxygen in the wells does not approach or exceed 1 ppm.

The nutrients, phosphate and ammonium sulfate in solution will be added to the monitoring wells to serve as nutrients for the bacteria. Dissolved phosphate will be added to yield 1ppm, while ammonium sulfate will be added to yield approximately 0.4 ppm ammonia and 1.14 ppm sulfate, respectively. Please optimize the ratio of C:N:P in groundwater as necessary based on groundwater analysis. A recommended optimum soil ratio of C:N:P is 100:10:1 to 100:1:1.


A vapor extraction test will be performed to determine the viability of this method. This was initially thought to be a potential viable method when horizontal slotted piping was installed during tank and piping installation. Because of the high levels of gasoline in groundwater, a combination of active and natural remediation may be necessary.

An essential part to the above remediation is continual groundwater monitoring to chart the progress and indicate if additional supplements or actions are necessary. This work plan is approved, therefore, you should initiate the work plan as soon as possible.

Mr. A. Razi
3609 E. 14th St.
StID # 3337
March 24, 1998
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. Roy Butler, Western Geo-Engineers, 1386 East Beamer St.,
Woodland, CA 95776

wpap3609

3337

WECE **ESTERN**
GEO-ENGINEERS

CALIF CONTRACTOR # 513857 A CORPORATION
REGISTERED GEOLOGISTS

1386 EAST BEAMER STREET
WOODLAND, CA 95776-6003
FAX (916) 662-0273
(916) 668-5300

FROM: Roy Butler

DATE: 3/2/98

TO: Barney Chen

FAX #: 910 337-9335

TOTAL PAGES
INCLUDING THIS PAGE
3

Submitted to Tan K. Fund.

This is just a proposal for the examining & proposal
for air spargers / soil removal or vapor extraction, all
of which may be appropriate.



CALIF CONTRACTOR # 513857 A CORPORATION
REGISTERED GEOLOGISTS

1386 EAST BEAMER STREET
WOODLAND, CA 95776-6003
FAX (916) 662-0273
(916) 668-5300

March 2, 1998

Mr. James DiGiorgio, P.E.
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA. 94244-2120
(916)227-7748, fax (916) 227-4530

RE: Mr. Abolghassem Razi, Tony's Express Auto Services, 3609 E. 14th Street, Oakland, CA 94601,
UST Cleanup Fund Program Claim #007912 - Steve Marquez

Dear Mr. DiGiorgio:

Western Geo-Engineers (WEGE), on behalf of Mr. Abolghassem Razi, the owner of the property listed above, is requesting pre-approval of costs to fulfill the Alameda County Health concerns addressed in their latest letter of February 18, 1998.

Mr. Chan's letter dated February 18, 1998 requires a work plan to enhance the conditions for aerobic biodegradation.

Western Geo-Engineers proposes to develop this work plan for the cost of \$2,958.00, please see attached estimate for cost breakdown.

Mr. Abolghassen Razi can be contacted directly at 3609 East 14th Street, Oakland, California 94601 (510) 261-4444. If you should have any questions about this pre-approval, please do not hesitate to call me at (916) 668-5300.

Thank you,

Roy Butler
Project Geologist - Western Geo-Engineers

Cc: Mr. Abolghassem Razi (510) 261-4444
Mr. Barney Chan, Alameda County Health (510) 567-6765



**WESTERN
GEO-ENGINEERS**
CALIF CONTRACTOR # 513857 A CORPORATION
REGISTERED GEOLOGISTS

1386 EAST BEAMER STREET
WOODLAND, CA 95776-6003
FAX (916) 662-0273
(916) 668-5300

Cost Estimate

02/20/88

Tony's Express Auto Services
3809 E. 14th Street
Oakland, Ca 94601

Item rate units subtotal total per task

Site visit to determine appropriate location for remediation equipment and treatment points

Geologist	70	3	\$210.00	
mob/demob	70	2	\$140.00	
car mileage	0.35	80	\$28.00	\$378.00

Airsparging

Design air sparging system, spec out equipment.	70	6	\$420.00	
Develop system diagrams and plans.	70	4	\$280.00	
Develop air sparging effectiveness monitoring plan.	70	3	\$210.00	\$910.00

Cost benefit study to determine the practicality to remove remaining contaminated soil

Determine extent and amount of contaminated soil from current data.	70	4	\$280.00	
Determine removal and disposal cost	70	3	\$210.00	
Estimate cost to remediate soil without removal	70	3	\$210.00	\$700.00

Develop supplemental nutrient addition program.

Determine maximum concentrations of Ammonia and orthophosphate, as additives.	70	3	\$210.00	
Develop nutrient addition plan.	70	4	\$280.00	
Develop sampling plan to determine effective concentrations	70	2	\$140.00	\$630.00

Vapor extraction

Develop workplan vapor extraction pilot test.	70	2	\$140.00	\$140.00
---	----	---	----------	----------

Registered Geologist review	100	2	\$200.00	\$200.00
-----------------------------	-----	---	----------	----------

TOTAL ESTIMATED COST NOT TO EXCEED:

\$2,958.00

Thank you for the opportunity to provide you with this bid, I look forward to working with you.

Roy Butler
Roy Butler
Project Geologist
Western Geo-Engineers

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



February 18 1998
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

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

**Re: Work Plan for Enhanced Bio-Remediation at 3609 E. 14th St.,
Oakland CA 94601**

Dear Mr. Razi:

As you are aware, since I last wrote to you on August 13, 1997, you have changed consultants to Western Geo-Engineers and have changed the work plan previously submitted by Soil Tech Engineering. The new proposed work plan approach was to measure the monitoring wells for biodegradation parameters, monitor them for the petroleum contaminants and perform a Tier 2 Risk Based Corrective Action (RBCA) evaluation prior to making specific recommendations for the site. Our office has received and reviewed the December 30, 1997 Quarterly Monitoring report from Western Geo-Engineers describing the results of this work.

This report results indicate that although natural bio-degradation is likely occurring, it is not occurring under optimal conditions. Recall, the following parameters were analyzed in specific water samples from the monitoring wells at this site: dissolved oxygen, nitrate, sulfate, ferrous iron, methane, carbon dioxide, hydrocarbon degraders, ammonia nitrogen and orthophosphate. The first four parameters are indicators of aerobic and anaerobic degradation. (ie bacteria degradation which occur in the presence and absence of oxygen). Methane and carbon dioxide are the end products of anaerobic degradation and aerobic biodegradation, respectively. Hydrocarbon degraders is a ~~the~~ count of the bacteria which utilize gasoline as a food source. Ammonia nitrogen and orthophosphate are nutrients used by the bacteria for growth.

Based upon the analysis of the above parameters, the following evaluation was made:

* **Dissolved oxygen**- Of the ten monitoring wells analyzed, only two, MW7 and MW8 had what would be considered sufficient concentration of dissolved oxygen for aerobic degradation.

* **Oxidation Reduction potential (ORP)**- Generally for aerobic degradation to occur, the ORP is positive and lower within the contaminant plume compared to that outside. It appears that the negative ORP values for MW1, MW2 and MW7 mark the heart of the gasoline plume, however, the low ORP values for the other wells

Mr. A. Razi
StID # 3337
3609 E. 14th St.
February 18, 1998
Page 2.

may indicate an overall reduced groundwater condition, which is consistent with the low oxygen concentrations found. It is known that the most rapid biodegradation occurs aerobically.

* **Nitrate** concentration- In the absence of oxygen, nitrate can be used as an electron acceptor for anaerobic biodegradation. A reduced concentration within the heart of the plume would be expected for anaerobic degradation. The low nitrate concentration in the majority of the wells is consistent with anaerobic degradation.

* **Sulfate** concentration- Similar to nitrate, under oxygen deficient conditions, sulfate can be used as an electron acceptor for anaerobic biodegradation. The low concentrations of sulfate exhibited in the wells again is conducive to anaerobic biodegradation.

* **Ferrous iron** is the result of the use of ferric iron as an electron acceptor. Its presence may be an indicator of aerobic biodegradation. The higher level of ferrous iron in MW1, MW2, MW8 and MW10 are possibly the result of the reduction of ferric iron.

* **Carbon dioxide** is generated as the biproduct of aerobic degradation of hydrocarbons (eg gasoline). Its presence may indicate the degree of which this activity is occurring.

* **Methane** is the result of anaerobic degradation of organic matter such as hydrocarbons. Its presence indicates the potential of methanogenesis from degrading organic material.

* **Ammonia and orthophosphate** are nutrients used along with the food source (hydrocarbons) by the **hydrocarbon degrading bacteria**. Low levels of these nutrients and the low count of degrading bacteria again indicate that conditions are not optimal for aerobic biodegradation.

It should be noted, however, that these are just indicator parameters for biodegradation and cannot be used with certainty. Natural occurring chemicals found in native soils can also generate levels of these chemical parameters which could mislead your interpretations. It is clear, however, that this site is in need of additional supplements of some of the parameters. Natural biodegradation is not currently occurring in significant amounts and the gasoline plume has migrated beyond the limits of

Mr. A. Razi
StID # 3337
3609 E. 14th St.
February 18, 1998
Page 3.

the property boundary. It appears that the gasoline release, although old, has impacted the entire site and a true upgradient "background" well does not exist. Significant gasoline and BTEX contamination was found in MW10, approximately 100' downgradient of this site.

The Tier 2 Risk Based Corrective Action (RBCA) evaluation of the site indicates that the risk to indoor air exposure from both soil and groundwater concentrations of benzene exists in exceedance of that acceptable for commercial exposure scenario, $10E-5$.

Therefore, due to the lack of evidence of natural biodegradation, the high levels of gasoline and benzene, the continued migration of the gasoline and benzene plume and the excess risk predicted by the RBCA, you are requested to submit a work plan to enhance the conditions for aerobic biodegradation. Please submit your work plan **within 30 days or by March 19, 1998.**

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

Sincerely,


Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. Roy Butler, Western Geo-Engineers, 1386 East Beamer St.,
Woodland, CA 95776

2wpqu3609



WESTERN
 GEO-ENGINEERS
 CALIF. CONTRACTOR #513857
 REGISTERED GEOLOGISTS

1386 EAST BEAMER STREET
 WOODLAND CA 95776-6003
 (916) 668-5300,
 FAX (916) 662-0273
 wege@mother.com

FEB 19 PM 3:41

February 17, 1998

Mr. Barney Chan
 Environmental Health Services
 Environmental Protection (LOP)
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577
 (510) 567-6700 Fax (510) 337-9335

RE: Amendment to the conclusions for Tony's Express Auto Services, 3609 E. 14th Street, Oakland, CA 94601. As discussed in Tony's 4th Quarter 1997 Report.

Dear Mr. Chan:

After further discussion with Mr. Abolghassem Razi, we would like to submit the following amendments to the conclusions submitted in the Tony's 4th Quarter 1997 report.

CONCLUSIONS

1. Continue site monitoring for one year to evaluate this site for low risk closure, plume stability.
2. ~~(or)~~ *and* Begin to add ammonia phosphate to the groundwater monitoring wells, in order increase the nutrition level.
3. Install and start air sparging to increase Oxygen levels in the groundwater plume.
4. Perform a vapor extraction pilot test in order to determine the effectiveness of vapor extraction to remove the hydrocarbon contamination remaining in the soil, and to increase the amount of oxygen available in the ground water.

need specific actions & schedule.

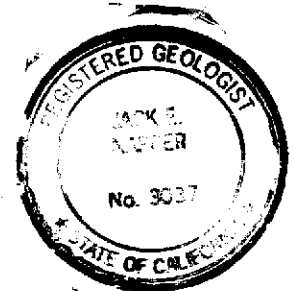
start until after 3/19/98 to their requested response

If you have any questions concerning this report or if we can be of further assistance, please don't hesitate to contact us at (530) 668-5300.

Respectfully,

Roy Butler
 Roy Butler
 Project Geologist

Jack E. Napper
 Jack E. Napper
 Registered Geologist #3037



CC: Mr. Abolghassem Razi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



August 13, 1997
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

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

**Re: Work Plan for Enhanced Bio-Remediation at 3609 E. 14th St.,
Oakland CA 94601**

Dear Mr. Razi:

Our office has received and reviewed the following reports submitted to our office: **May 6, 1997 and July 31, 1997 Quarterly Groundwater Monitoring and Sampling Reports and the July 28, 1997 Work Plan for Enhanced Bio-Remediation** provided by Soil Tech Engineering, Inc. This work plan is in response to my February 13, 1997 letter which requested that you complete site characterization and determine if the site meets the "low risk groundwater case" classification. To meet this classification, conditions for natural bioremediation should be verified and enhanced if necessary.

Upon review of the July 28, 1997 work plan, our office has the following comments and questions:

1. Please explain why and how monitoring well STMW-9 was decommissioned.
2. MTBE has not been detected in previous monitoring well sampling events, therefore, it will not be required in future monitoring.
3. As a means of enhancing natural bioremediation, the work plan proposes the addition of the nutrients; ammonium sulfate and ammonium phosphate. A solution of these compounds will be regulated and added to the wells not to exceed 10 ppm nitrate as nitrogen, the MCL for nitrate. Please analyze for these parameters prior to addition and supplement them as needed. What is the recommended level for nitrate, sulfate and phosphate for optimal natural degradation? In addition, ORC, oxygen releasing compound will be added to wells to insure an oxidizing condition in groundwater. All wells except STMW-5, STMW-7 and STMW-11 will have nutrients added. What wells will have ORC added to them ?
4. Please note that chemical and biological analysis is required on all wells to establish background levels and levels within the contaminated area. Trends may be later established to verify natural bioremediation.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
August 13, 1997
Page 2.

5. The work plan stated that information on ORC is included in Appendix A. It was, however, not included in the report.

6. When sampling the monitoring wells, please explain how you can insure that the water sampled is representative of current groundwater conditions. Won't the plume be more remediated next to the well and less bioremediated further from the oxygen source? Will your purging solve this problem?

7. It was noticed that Method 8260, volatile organics, was run on the wells at this site. A number of chemicals other than that typical of a petroleum release were detected. Why was this analysis run and what is the source of these other solvents? (ie acetone, chloroform, 2-hexanone, methyl chloride, naphthalene etc.)

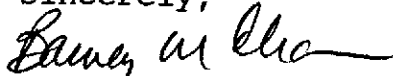
8. There are problems with the analytes and analysis recommended for the groundwater samples. Please adhere to the following lists of analytes and analytical methods:

- * TPHg by Method 8015
- * BTEX by Method 8020
- * VOAs by Method 8260: if 8260 is done, you may eliminate Method 8020. Please discuss whether these other solvents should be analyzed on a routine basis.
- * nitrate as nitrogen, sulfate, orthophosphate, iron +2 via EPA Methods or Standard Method for analyzing water and wastewater
- * dissolved oxygen and oxidation-reduction potential- measured in the field
- * hydrocarbon oxidizing and total heterotrophic bacteria- required only as frequent as necessary to establish a viable population count

Please provide a written response to the above items within 30 days or by September 15, 1997.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
F. Hamedi-Fard, Soil Tech Engineering, 298 Brokaw Rd., Santa Clara, CA 95050

wpqu3609

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

February 13, 1997
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

Re: Subsurface Investigation at 3609 E. 14th St., Oakland 94601

Dear Mr. Razi:

Our office has received and reviewed the October 15, 1996 Additional Subsurface Investigation.. and the December 30, 1996 Quarterly Groundwater Monitoring reports for the above site as prepared by Soil Tech Engineering. The October report details the installation of five borings and development of three of the borings into monitoring wells STMW-9, -10 and -11.

The December 30, 1996 monitoring report indicates still high levels of TPHg in groundwater onsite with lower levels offsite. Noticeably low levels of BTEX (benzene, toluene, ethylbenzene and xylenes) is found in all samples.

At this time, our office recommends that you determine whether your site can be characterized as a "low risk groundwater case" as described by the Water Board. To do this, you should as Soil Tech recommend, complete site characterization. This should be done in the northwesterly direction, downgradient of STMW-8. At least one additional monitoring well should be installed at the edge of the plume in this direction. cursory review of chemical concentrations indicates that no immediate threat to human health exists under current site conditions.

It is also recommended that you measure a selected number of monitoring wells for parameters indicative of intrinsic bioremediation; dissolved oxygen, oxidation-reduction potential, pH, conductivity, temperature, alkalinity, nitrate, sulfate and ferrous iron. Typically at least three monitoring wells are sampled and tested for these parameters; one upgradient, one within the heart of the plume and one downgradient. Additionally, since we have not noticed a significant decline in TPHg within the most contaminated wells, you should consider the addition of chemicals/agents to enhance natural bioremediation.

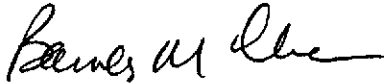
Please submit a work plan to further characterize the extent of groundwater contamination, to measure for indicator parameters for intrinsic bioremediation and to add agents to wells to enhance natural bioremediation. You should identify which wells will be monitored and which wells will have chemicals/agents added.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
February 13, 1997
Page 2.

Keep in mind, the recommended remedial approach for the low risk groundwater case is verification monitoring. Please submit your work plan **within 30 days or by March 14, 1997.**

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. Frank Hamedi-Fard, Soil Tech Eng., Inc., 1761 Junction
Ave., San Jose, CA 95112

B. Chan, files

bio3609

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



August 1, 1996
StID # 3337

20265

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

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

Re: Amendment to Work Plan Dated May 13, 1996 for 3609 E. 14th St., Oakland CA 94601

Dear Mr. Razi:

Our office has received and reviewed the July 8, 1996 Soil Tech Engineering Work Plan Amendment for additional subsurface investigation at the above referenced site. This work plan incorporates the suggestions made in my May 31, 1996 letter and comments made to Mr. Frank Hamedi during my June 19, 1996 site visit.

The work plan amendment is thus approved with the following conditions:

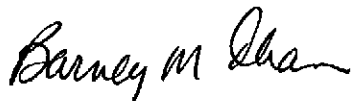
1. Only five soil borings will be drilled down-gradient of the underground tanks;
2. Based on field screening results of the soil borings, only those samples with significant volatile readings will be analyzed in the laboratory.
3. Water samples will be sampled through a temporary casing.
4. Based on the analytical results of samples from these borings, one or two additional monitoring wells will be installed. Please obtain concurrence as to the number and location of additional well(s) prior to installation.
5. Quarterly groundwater sampling and analysis will be discontinued for wells STMW-1, STMW-5 and STMW-7, however, groundwater elevation readings will still be taken to be incorporated into a groundwater contour map for the site.

Please notify our office at least 72 working hours prior to the field work so I may arrange to be present if possible.

I may be reached at (510) 567-6765 if you have any questions.

Mr. A. Razi
StID # 3337
3609 E. 14th St., Oakland
August 1, 1996
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. F. Hamed, Soil Tech Engineering, Inc. 1761 Junction Ave.,
Santa Jose, CA 95112

~~G. Coleman, files~~

wpamd3609

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

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

II, III

Site ID # _____ Site Name Jony's Auto Express Today's Date 6/19/96
Site Address 3609 E14th
City _____ Zip 94601 Phone _____

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

Inspection Categories:

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

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

Comments:

Met w/ Mr Frank Hamed of Soil Tech to discuss the proposed wp and County's comments. We agreed to:

- ① Eliminate 4 borings on the N+W side of prop.
- ② Reduce # of borings on the South of prop to 5 & # of mws to 2 (based on boring GW results)
- ③ Eliminate monitoring of mw 1, 5 + 7.

I should receive a mod. wp from Soil Tech. Also walked around site. Penetration / building damage was occurring. Informed by mining contractor that the offsite prop belonged to the Church. I offered to get involved if offsite encroachment was not allowed.

Contact _____
Title _____
Signature _____

Inspector B. Chan
Signature _____

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

May 31, 1996
StID # 3337

Mr. Abolghassem Razi
Tony's Express Auto Services
3609 E. 14th St.
Oakland CA 94601

**Re: Proposed Additional Subsurface Investigation Work Plan
for 3609 E. 14th St., Oakland CA 94601**

Dear Mr. Razi:

Our office has completed the file review for the above site including the **May 13, 1996 Proposed Additional Subsurface Investigation** as prepared by Soil Tech Engineering. This work plan was prepared in response to my January 11, 1996 request. The request was prompted by our office's concern about the offsite migration of the petroleum hydrocarbon plume and its human health threat to workers and/or inhabitants in the neighborhood. The work plan calls for the advancement of up to ten (10) soil borings where both soil and groundwater samples will be taken. Based upon these results, up to three (3) additional wells will be developed within these borings.

Upon review of the work plan, our office finds the number and location of these borings and wells excessive and unnecessary. The four (4) borings on the northern and western perimeter of the site are unnecessary. Analytical results from monitoring wells 5 and 7 indicate that the petroleum contaminant plume has been defined in these areas to levels which are protective of human health. The seven borings proposed on the southern portion of the site is excessive. Three or four strategically place borings would be sufficient to determine the relative impact to groundwater within this area. Based on the results of these samplings, one of the borings should be developed into a monitoring well. This well could then estimate, with a good degree of confidence, the highest anticipated offsite contaminant concentration.

It was noticed that sites further south of the accessible alleyway are not included in this investigation. Should the offsite groundwater results indicate a potential human health threat, this area will need characterization.

In addition, based on the soil sample results from the prior monitoring wells, it appears that downgradient contamination is being transported only through groundwater migration. Therefore, you may omit the chemical analysis of shallow soil samples from the borings unless field screening results indicate obvious contamination.

Mr. Abolghassem Razi
3609 E. 14th St.
StID # 3337
May 31, 1996
Page 2.

It is also appropriate to modify the number of monitoring wells being sampled for chemical analysis. You should continue to take groundwater elevation readings from all eight (8) wells, however, you may discontinue sampling and monitoring of wells #5, #7 and #1. It appears that the data from these wells do not offer additional valuable information.

Please have your consultant review our office's comments and revise the work plan accordingly. Please submit a revised work plan to our office **within 30 days or by July 1, 1996.**

I may be reached at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. L. Koo, Soil Tech Engineering, Inc. 298 Brokaw Rd., Santa Clara, CA 95050

G. Coleman, Miss

adssi3609

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

May 9, 1996
StID # 3337

Tony's Express Auto Services
Mr. Abolghassem Razi
3609 E. 14th St.
Oakland, CA 94601

NOTICE OF VIOLATION

**Re: Request for Work Plan for Additional Subsurface
Characterization and Performance of a Soil-Vapor Extraction
Test at 3609 E. 14th St., Oakland 94601**

Dear Mr. Razi:

Our office requested in my January 11, 1996 letter, that a work plan for offsite subsurface characterization be sent for our review by February 26, 1996. To date, we have yet to receive the requested report. Additionally, previous Soil Tech Engineering reports have proposed performing a soil-vapor extraction test at this site. Please submit the requested report and schedule the extraction test **within 30 days or by June 11, 1996.**

You are also reminded to continue to monitor the existing eight (8) wells at your site on a quarterly basis.

Our office has been informed that petroleum contamination has migrated offsite beneath adjacent properties. One property is scheduled for future development, therefore, your offsite investigation is necessary to evaluate human health risk to current as well as future offsite occupants.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: Mr. F. Hamedi-Fard, Soil Tech Engineering, Inc., 298 Brokaw
Road, Santa Clara, CA 95050

G. Coleman, Files
NOV3609

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY
ENVIRONMENTAL HEALTH SERVICES
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

January 11, 1996
StID # 3337

Tony's Express Auto Services
Mr. Abolghassem Razi
3609 E. 14th St.
Oakland, CA 94601

**Re: Comment on October 9, 1995 Additional Subsurface
Investigation Report for 3609 E. 14th St., Oakland 94601**

Dear Mr. Razi:

Our office has received and completed its review of the above referenced report as prepared by Soil Tech Engineering, Inc. This report details the installation of six borings to further delineate soil and groundwater contamination from the former gasoline tanks and their associated piping. Of the six borings, five were converted into monitoring wells. The results of the investigation indicate that the gasoline groundwater plume has migrated downgradient from the initial sources of release. There is a high likelihood that the groundwater contamination has migrated offsite and impacted adjacent properties. Additional onsite subsurface soils, however, do not appear to have been impacted.

At a minimum, please continue to monitor all wells on a quarterly fashion. All wells should be analyzed for the analytes: TPHg and BTEX. In addition, monitoring well STMW-6 should be analyzed for TOG. Your report should be sent to our office **within 45 days of the monitoring event.**

Our office concurs with the recommendation of Soil Tech Engineering, ie the extent of groundwater contamination must be determined. In order to achieve this, our office recommends the use of a rapid site assessment tool such as the "Geoprobe", "Hydropunch", Cone Penetrometer et al. Permanent monitoring well(s) may be required based on the result of this additional assessment. Because, encroachment and/or offsite access agreements may be required, you should initiate conversation with potential affected offsite parties. To do this, you will need an approved work plan for offsite characterization. Please submit such a work plan to our office **within 45 days or by February 26, 1996.**

Mr. A. Razi
StID # 3337
3609 E. 14th St.
January 11, 1996
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. F. Hamedi-Fard, Soil Tech Engineering, Inc., 298 Brokaw
Road, Santa Clara, CA 95050

~~at~~ G. Coleman, files

3609adssi

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

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

October 4, 1995
StID # 3337

Mr. Abloghassem Razi
3609 E. 14th St.
Oakland CA 94601

**Re: Groundwater Sampling Analysis Requirements for Wells at
3609 E. 14th St., Oakland CA 94601**

Dear Mr. Razi:

This letter recounts the conversation I had recently with Mr. Noori Ameli of Soil Tech Engineering, Inc. Based on the results of the initial tank removals, groundwater samples from all wells should be analyzed for TPHg and BTEX. In addition, MW-6, the well downgradient from the former waste oil tank pit should also be analyzed for TPH as motor oil.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: ~~G. Young, files~~
N. Ameli, Soil Tech Engineering (fax copy only)
mon3609

white - env. health
yellow - facility
pink - files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Inspection Form

II, III

Site ID # 3337 Site Name Tony's Express Today's Date 8/31/95

Site Address 3609 E 14th

City _____ Zip 94601 Phone _____

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

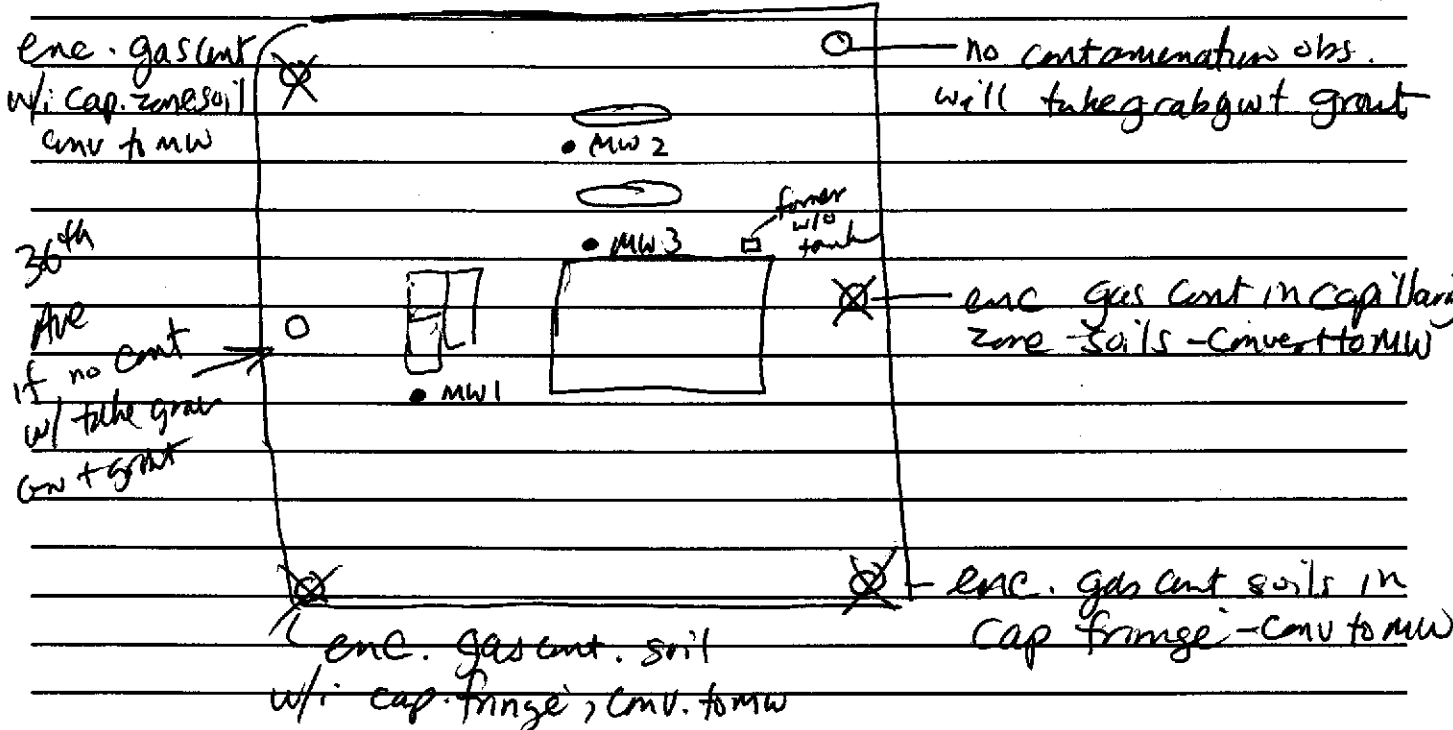
Inspection Categories:

- _____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- _____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
- _____ III. Under ground Storage Tanks

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

Comments:

E14th



met w/ N. Amelise of Soil Tech onsite, Mr Razi present too. An extensive GW plume from least islands is likely.

Contact _____
Title _____
Signature _____

Inspector B. Chan
Signature _____

II, III

STATE WATER RESOURCES CONTROL BOARD
DIVISION OF CLEAN WATER PROGRAMS
 2014 T STREET, SUITE 130
 P.O. BOX 944212
 SACRAMENTO, CALIFORNIA 94244-2120
 (916) 227-4360
 (916) 227-4530 (FAX)



for
 AUG 15 1995

Abolghassem Razi
 3609 East 14th Street
 Oakland, CA 94601

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 007912, FOR SITE ADDRESS: 3609 East 14th Street, Oakland, CA 94601

The State Water Resources Control Board (State Board) takes pleasure in issuing the attached Letter of Commitment in an amount not to exceed \$75,000. This Letter of Commitment is based upon our review of the corrective action costs incurred to date and your application received on November 12, 1993 and may be modified by the State Board in writing by an amended Letter of Commitment.

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

This package includes the following:

- A "Reimbursement Request Instructions" package. Retain this package for future reimbursement requests. These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are:
 - Samples of completed Reimbursement Request forms and Spreadsheets.
 - Recommended Minimum Invoice Cost Breakdown
- A "Bid Summary-Sheet to list information on bids received.
- A "Certification of Non-Recovery From Other Sources" which must be returned before any reimbursements can be made.
- "Reimbursement Request" forms which you must use to request reimbursement of costs incurred.
- "Spreadsheet" forms which you must use in conjunction with your Reimbursement Request.
- "Claimant Data Record" (Std. Form 204) which must be completed and returned with your first Reimbursement Request.

YOU MUST SUBMIT A REIMBURSEMENT REQUEST PACKAGE BY October 18, 1995, OR SEND A WRITTEN UPDATE EXPLAINING:

1. Status of cleanup to date.
2. Reason(s) why a reimbursement request has not been submitted.
3. Costs incurred to date for corrective action.
4. Projected date for submitting a reimbursement request.

We constantly review the status of all active claims. If you do not submit a reimbursement request or a written update by the date above, or fail to proceed with due diligence with the cleanup, we will take steps to withdraw your Letter of Commitment.

If you have any questions regarding the Letter of Commitment or the Reimbursement Request package, please contact Cheryl Gordon at (916) 227-4539.

Sincerely,

Dave Deaner
 Dave Deaner, Manager
 UST Cleanup Fund Program

Enclosures

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

LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 007912

AMENDMENT NO: 0

CLAIMANT: Abolghassem Razi

BALANCE FORWARD: \$0

CO-PAYEE: None

JOINT CLAIMANT: None

THIS AMOUNT: \$75,000

NEW BALANCE: \$75,000

CLAIMANT ADDRESS: 3609 East 14th Street
Oakland, CA 94601

TAX ID/SSA NO: 548-79-7190

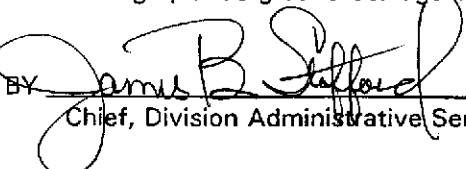
Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse Abolghassem Razi (Claimant) for eligible corrective action costs at Tony's Express Auto Service 3609 East 14th Street, Oakland, CA 94601 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$75,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 18th day of July, 1995.

STATE WATER RESOURCES CONTROL BOARD

BY 
Manager, Underground Storage Tank Cleanup Fund Program

BY 
Chief, Division Administrative Services

STATE USE:
CALSTARS CODING:
0550-569.02 - 30530
\$ _____

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Director

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

August 15, 1995
StID #3337

Mr. Abolghassem Razi
3609 E. 14th St.
Oakland CA 94601

**Re: Clarification of May 25, 1995 Work Plan for Additional
Site Assessment at 3609 E. 14th St., Oakland 94601**

Dear Mr. Razi:

This letter serves to clarify the requirements of the soil boring/monitoring well installations previously mentioned in the May 25, 1995 Soil Tech work plan. Recall, this part of the investigation called for the advancement of approximately six borings and the installation of two or three monitoring wells. Later a vapor extraction test would be performed with the existing in-place system. Keep in mind, the motive for these borings/wells is to determine the extent of both soil and groundwater contamination in the vicinity of the former tanks and piping runs. Because of this, you are requested to take both soil and a grab groundwater sample from each of the borings. Based on your field observations, two to three permanent monitoring wells will be installed within these borings. Again, the wells should be installed in locations which determine the full extent of groundwater contamination. Both up and downgradient locations must be considered. To this end, three wells will likely be needed.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. F. Hamedi, Soil Tech Eng., 298 Brokaw Rd., Santa Clara CA
95950

T. Peacock, files

wpcl3609

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Director

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

June 30, 1995
StID #3337

Mr. Abolghassem Razi
3609 E. 14th St.
Oakland CA 94601

**Re: Implementation of May 25, 1995 Work Plan for Additional
Site Assessment at 3609 E. 14th St., Oakland 94601**

Dear Mr. Razi:

This letter serves to summarize our conversation on June 29, 1995 regarding the implementation of the above work plan. You stated that you would be able to initiate this work plan within 45 days. I stated that this would be approximately August 15, 1995 and this date was agreed upon to start your investigation. Recall, this investigation would consist of the advancement of approximately six borings and the installation of two or three monitoring wells. Later a vapor extraction test would be performed with the existing in-place system.

I have informed Ms. Cheryl Gordon of the SWRCB Clean-up Fund that based on this commitment from you, your site is considered in compliance. Remember, failure to meet the above deadlines will jeopardize your eligibility to the Fund.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. F. Hamedi, Soil Tech Eng., 298 Brokaw Rd., Santa Clara CA
95950
Ms. C. Gordon, SWRCB, Underground Storage Tank Cleanup Fund
Program, P.O. Box 944212, Sacramento, CA 94244-2120
J. Makishima, files
LOC3609

ENVIRONMENTAL
PROTECTION
95 JUN 27 PM 2:41

June 26, 1995

3337

*Reviewed start
still very high
BTEX in new
(phases)*

Mr. Barney M. Chan
Alameda County Health Care Services Agency
Department of Environmental Health
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, California 94502-6577

- need to perform (over) wells

Dear Mr. Chan:

Enclosed a copy of quarterly report prepared by Soil Tech Engineering, Inc. for my site. Up to date, I have spent over \$100,000 for soil removal and site remediation. At this time due to my financial difficulty, I am not able to perform the additional investigation. However, as soon as some money is available, I will comply with the recommendations of the work plan, for installation of monitoring well within 45 days from date of this letter.

If you have any questions, please contact me at (510) 261-4444.

Sincerely yours,

**TONY'S EXPRESS
AUTO SERVICE CENTER
8600 E. 14th STREET
OAKLAND, CA 94601
(510) 261-4444**

Abolghassem Razi

ENVIRONMENTAL
PROTECTION

95 JUN -7 PM 12:47

June 6, 1995

Mr. Barney M. Chan
Alameda County Health Care Services Agency
Department of Environmental Health
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Dear Mr. Chan

Enclosed a copy of work plan prepared by Soil Tech Engineering, Inc. for additional investigation. Up to date, I have spent over \$100,000 for soil removal and site remediation. At this time due to my financial difficulty, I am not able to perform the additional investigation. However, as soon as some money is available, I will comply with the recommendations of the work plan.

If you have any questions, please contact me at (510) 261-4444.

Sincerely yours,

Abloghassem Razi


TONY'S EXPRESS
AUTO SERVICE CENTER
3609 E. 14th STREET
OAKLAND, CA 94601
(510) 261-4444

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

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

May 4, 1995
StID # 3337

Mr. Abolghassem Razi
3261 Ramona St.
Pinole, CA 94564

FINAL NOTICE OF VIOLATION

**Re: Request for Technical Reports for Subsurface Investigation
at Tony's Express Auto Service, 3609 E. 14th St., Oakland
CA 94601**

Dear Mr. Razi:

Our office has received and reviewed the March 10, 1995 quarterly groundwater report for the above site as prepared by Soil Tech Engineering. Please be advised that you are still delinquent on a number of technical reports requested in my initial Notice of Violation dated November 22, 1994 and in my second Notice of Violation dated March 6, 1995.

I call your attention to the items previously requested:

1. You have yet to provide documentation for the disposition of the large amounts of stockpiled soils generated during the excavation and overexcavation processes. Please provide this information **within 30 days or by June 5, 1995.**
2. You were previously requested to perform a vapor extraction pilot test to determine the viability of this remediation approach. Should this approach be viable, you were requested to give a timetable for its implementation. Please provide the results of your vapor extraction test **within 30 days or by June 5, 1995.**
3. You were also requested to submit a supplemental work plan for the determination of the extent of soil and groundwater contamination. Additional monitoring wells will be required at a minimum. Please provide your **supplemental work plan within 30 days or by June 5, 1995.**

Failure to submit the requested documents will cause this case to be referred to the Water Board or the District Attorney Office for enforcement. It will also put this site out of compliance which will make you ineligible for the Clean-up Fund. Ms. Cheryl Gordon of the SWRCB Clean-up Fund is notified of this through copy of this letter.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
May 4, 1995

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

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

Ms. C. Gordon, SWRCB, UST Cleanup Fund, P.O. Box 944212,
Sacramento CA 94244-2120

B. Reynolds, files

FNOV3609

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 6, 1995
StID # 3337

Mr. Abolghassem Razi
3261 Ramona St.
Pinole, CA 94564

DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

SECOND NOTICE OF VIOLATION

**Re: Request for Technical Reports for Subsurface Investigation
at Tony's Express Auto Service, 3609 E. 14th St., Oakland
CA 94601**

Dear Mr. Razi:

Our office has received and reviewed the December 8, 1994 quarterly groundwater report for the above site as prepared by Soil Tech Engineering. Please be advised that you are still delinquent on a number of technical reports requested in my initial Notice of Violation dated November 22, 1994.

I call your attention to the items previously requested:

1. Though we have received the above mentioned report, it is clear that over one year elapsed without any quarterly monitoring occurring at all. Please be reminded quarterly monitoring is the minimum requirement for this site unless a change in monitoring frequency is agreed upon by our office or that of the Regional Water Quality Control Board (RWQCB).

2. You have yet to provide documentation for the disposition of the large amounts of stockpiled soils generated during the excavation and overexcavation processes. Please provide this information in your next quarterly groundwater report.

3. Point three of my prior letter requested that you perform a vapor extraction pilot test to determine the viability of this remediation approach. Should this approach be viable, you were requested to give a timetable for its implementation. Please provide the results of your vapor extraction test within 30 days or by April 10, 1995.

4. Point four of my prior letter requested that you submit a supplemental work plan for the determination of the extent of soil and groundwater contamination. Additional monitoring wells will be required at a minimum. Please provide your supplemental work plan within 30 days or by April 10, 1995.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
March 6, 1995
Page 2.

Keep in mind that failure to submit the requested documents may cause this case to be referred to the Water Board or the District Attorney Office for enforcement. It will also put this site out of compliance which will jeopardize your eligibility for the Clean-up Fund. Ms. Cheryl Gordon of the SWRCB Clean-up Fund is notified of this through copy of this letter.

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

Sincerely,



~~Barney A. Chas~~
Hazardous Materials Specialist

cc: Mr. F. Hamedi, Soil Tech Engineering, 298 Brokaw Rd., Santa Clara, CA 95050
Ms. C. Gordon, SWRCB, UST Cleanup Fund, P.O. Box 944212, Sacramento CA 94244-2120
G. Coleman, files

2NOV3609

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

November 22, 1994
StID # 3337

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

Mr. Abolghassem Razi
3261 Ramona Street
Pinole, Ca 94564

NOTICE OF VIOLATION

**Re: Request for Technical Reports for Subsurface Investigation
at Tony's Express Auto Service, 3609 E. 14th St., Oakland
94601**

Dear Mr. Razi:

Our office's last report from you was the November 8, 1993 Soil Tech Engineering report which described the installation of three monitoring wells, the installation of vertical and horizontal vapor extraction probes and the advancement of approximately 13 borings around the former tank and fuel islands. Three of these borings were converted into monitoring wells. This report indicated elevated levels of gasoline left in soil and groundwater. In fact, the concentration of gasoline and BTEX (benzene, toluene, ethylbenzene and xylenes) detected indicate the possibility of free product.

Soil Tech Engineering has recommended the installation of additional borings/monitoring wells to determine the extent of contamination. They also recommended performing a vapor extraction pilot test to determine the effectiveness of this remediation approach. To this date, our office has not received any reports describing the progress being made at this site to investigate and remediate the fuel release.

Our office has the following requests/concerns which must be addressed immediately:

1. Groundwater monitoring is required minimally on a quarterly basis with reports due to our office **within 45 days of the sampling date**. Since the wells were sampled initially on October 1993, we would expect sampling results for 1/94, 4/94, 7/94 and 10/94. Be aware that quarterly reports are required per Title 23, Chapter 16, Section 2652 (d) of the California Underground Storage Tank Regulations.
2. Our office is not aware of the fate of the stockpiled soils generated during the tank removal. The August 5, 1993 from Soil Tech proposed bioremediation of soils for eventual Class III landfill disposal. Please provide documentation for the soil disposition.

Mr. Abolghassem Razi
StID # 3337
3609 E. 14th St.
November 22, 1994
Page 2.

3. Please perform a vapor extraction pilot test before the next quarterly monitoring event, 1/95. You should include the results of this test in your next quarterly monitoring report. Should vapor extraction prove viable, please indicate in a time schedule when the appropriate permitting will be completed and project when your vapor extraction system will be operative.

4. Please provide under a separate cover letter, a supplemental work plan to determine the extent of soil and groundwater contamination.

Please respond to the above items in writing, within 30 days or by December 26, 1994.

This is a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested reports will subject you to civil liability and cause this case to be referred to the Water Board for enforcement.

You may contact me at (510) 567-6765 if you have any questions. Please notice our office has moved to the following location:
1131 Harbor Bay Parkway, Room 250, Alameda CA 94502-6577.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. F. Hamedi, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050

E. Howell, files

NOVTony

XI. STATEMENTS

A. IDENTIFY ANY OTHER PERSON(S) THAT MAY HAVE FILED A CLAIM AGAINST THE UST CLEANUP FUND FOR CLEANUP OF THE SITE WHICH IS THE SUBJECT OF THIS CLAIM:

X
NAME X ABOLGHASEM RAZI
ADDRESS 3609 E 14th OAKLAND CA TELEPHONE NO. 510 261 4444

B. IDENTIFY OTHER PERSON(S) WHO HAVE INCURRED COSTS FOR CLEANUP OF THE SITE WHICH IS THE SUBJECT OF THIS CLAIM:

X
NAME
ADDRESS TELEPHONE NO.

C. DO YOU HAVE ANY KNOWLEDGE OF ANY CONTROVERSY (LAWSUITS, ETC.) REGARDING THE SITE THAT IS THE SUBJECT OF THIS CLAIM?

NO YES - PLEASE EXPLAIN:

XII. VERIFICATION

I (WE) HEREBY DECLARE UNDER PENALTY OF PERJURY THAT ALL FACTS AND STATEMENTS SET FORTH AS A PART OF THIS CLAIM APPLICATION ARE TRUE AND CORRECT TO THE BEST OF MY (OUR) KNOWLEDGE AND BELIEF.

EXECUTED AT X OAKLAND, CALIFORNIA
ON THIS X JAN DAY OF X 7, 19 X94

X 
CLAIMANT SIGNATURE

X ABOLGHASEM RAZI
PRINTED NAME

CLAIMANT SIGNATURE

PRINTED NAME

JOINT CLAIMANT SIGNATURE

PRINTED NAME

JOINT CLAIMANT SIGNATURE

PRINTED NAME

DELIVER COMPLETED CLAIM APPLICATION TO:	OR	MAIL COMPLETED CLAIM APPLICATION TO:
STATE WATER RESOURCES CONTROL BOARD DIVISION OF CLEAN WATER PROGRAMS UST CLEANUP FUND PROGRAM 2014 T STREET, SUITE 130 SACRAMENTO, CA 95814		STATE WATER RESOURCES CONTROL BOARD DIVISION OF CLEAN WATER PROGRAMS UST CLEANUP FUND PROGRAM P.O. BOX 944212 SACRAMENTO, CA 94244-2120

January 6, 1994

Mr. Ron Markle
Chief Underground Storage
Tank Clean-Up Fund Unit
2014 T Street, Suite 130
P.O. Box 944212
Sacramento, California 994244-2120

Regarding: Claim Number 7912

Dear Mr. Markle:

In respond to your letter dated November 22, 1993.

- A) A permit was issued by Oakland Fire Department, and a copy is attached.
- B) A copy of inspection from Alameda County Health and a copy of Unauthorized Released Form are attached.
- C) Regarding the leak on January 1, 1988 or June 30, 1988, I have no knowledge of any unauthorized release because I purchased the property on October 6, 1990.
- D) Copy of tax returns for 1990, 1991 and 1992 are attached.
- E) Page 8 of application, copy of map and all the letter from Alameda County are attached.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 29, 1993
StID # 3337

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

Mr. Abolghassem Razi
3609 E. 14th St.
Oakland CA 94601

**Re: Comment on November 8, 1993 Interim Corrective Action &
Preliminary Soil and Groundwater Investigation Report for
3609 E. 14th St., Oakland 94601**

Dear Mr. Razi:

Our office has received and reviewed the above referenced report as prepared by your consultant, Soil Tech Engineering, Inc. Recall this report details the installation of three monitoring wells and an additional 10 borings at the site in an attempt to determine the extent of soil and groundwater contamination. Upon our review, we have a number of comments and concerns which we require clarification. Please address the following concerns:

1. Please be advised that quarterly monitoring must now occur and continue until this site is recommended for case closure to the Regional Water Quality Control Board (RWQCB). These reports should be sent to our office to my attention, however, they need not be sent to the RWQCB.
2. In regards to the stockpiled soils generated from the tank removals, we understand that you have remediated the soils and are making arrangements for the disposal of these soils to an appropriate landfill. What is their current status? Please send copies of the soil receipts for their disposal as soon as possible.
3. The report states that vapor extraction probes were installed in four borings, one of which was boring B-11. However, Figure 4 in this report fails to identify this location as having a vapor extraction probe. Please clarify this information.
4. This report, as well as the July 27, 1993 report, indicates considerable residual soil contamination. Because your consultant is recommending soil vapor extraction, it is important that a vapor extraction test be performed immediately. Please describe how this test will be performed and what criteria will be used to determine the viability of this method. You should schedule this test **within the next 30 days**. Please note, the clay soil observed at this site is not usually conducive to this technique.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
December 29, 1993
Page 2.

5. Because of the elevated gasoline and BTEX contamination in the groundwater samples, you should evaluate the viability of groundwater extraction as a remedial technique. To this end, you should perform a groundwater extraction test as soon as possible. This test should be scheduled **within the next 60 days**. It is apparent with the high gasoline concentration found in STMW-3, free product may exist in this area. Please note that you are responsible for the removal and disposal of any free product and this should be done on a regular interval.

6. The additional borings and monitoring well(s) proposed for this site are appropriate for the further characterization of the soil and groundwater at this site. Please provide a site map indicating the proposed locations of these borings/wells before any of this work is performed. You are also reminded to notify our office 48 working hours prior to any field activity so I may witness such activities if possible.

Please provide a written response to the above items, **within 30 days or by January 31, 1994**. You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested report may subject you to civil liability.

You should contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: F. Hamedi, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050
E. Howell, files
4-3609E14

INSTRUCTIONS

EMERGENCY

Indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2800 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground storage tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

LOCAL AGENCY ONLY

To avoid duplicate notification pursuant to Health and Safety Code Section 25160.5, a government employee should sign and date the form in this block. A signature here does not mean that the leak has been determined to pose a significant threat to human health or safety, only that notification procedures have been followed if required.

REPORTED BY

Enter your name, telephone number, and address. Indicate which party you represent and provide company or agency name.

RESPONSIBLE PARTY

Enter name, telephone number, contact person, and address of the party responsible for the leak. The responsible party would normally be the tank owner.

SITE LOCATION

Enter information regarding the tank facility. At a minimum, you must provide the facility name and full address.

IMPLEMENTING AGENCIES

Enter names of the local agency and Regional Water Quality Control Board involved.

SUBSTANCES INVOLVED

Enter the name and quantity lost of the hazardous substance involved. Room is provided for information on two substances if appropriate. If more than two substances leaked, list the two of most concern for cleanup.

DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the leak.

SOURCE/CAUSE

Indicate source(s) of leak. Check box(es) indicating cause of leak.

CASE TYPE

Indicate the case type category for this leak. Check one box only. Case type is based on the most sensitive resource affected. For example, if both soil and ground water have been affected, case type will be "Ground Water". Indicate "Drinking Water" only if one or more municipal or domestic water wells have actually been affected. A "Ground Water" designation does not imply that the affected water cannot be, or is not, used for drinking water, but only that water wells have not yet been affected. It is understood that case type may change upon further investigation.

CURRENT STATUS

Indicate the category which best describes the current status of the case. Check one box only. The response should be relative to the case type. For example, if case type is "Ground Water", then "Current Status" should refer to the status of the ground water investigation or cleanup, as opposed to that of soil. Descriptions of options follow:

No Action Taken - No action has been taken by responsible party beyond initial report of leak.

Leak Being Confirmed - Leak suspected at site, but has not been confirmed.
Preliminary Site Assessment Workplan Submitted - workplan/proposal requested of/submitted by responsible party to determine whether ground water has been, or will be, impacted as a result of the release.
Preliminary Site Assessment Underway - implementation of workplan.
Pollution Characterization - responsible party is in the process of fully defining the extent of contamination in soil and ground water and assessing impacts on surface and/or ground water.
Remediation Plan - remediation plan submitted evaluating long term remediation options. Proposal and implementation schedule for appropriate remediation options also submitted.
Cleanup Underway - implementation of remediation plan.
Post Cleanup Monitoring in Progress - periodic ground water or other monitoring at site, as necessary, to verify and/or evaluate effectiveness of remedial activities.
Case Closed - regional board and local agency in concurrence that no further work is necessary at the site.

IMPORTANT: THE INFORMATION PROVIDED ON THIS FORM IS INTENDED FOR GENERAL STATISTICAL PURPOSES ONLY AND IS NOT TO BE CONSTRUED AS REPRESENTING THE OFFICIAL POSITION OF ANY GOVERNMENTAL AGENCY

REMEDIAL ACTION

Indicate which action have been used to cleanup or remediate the leak. Descriptions of options follow:

Cap Site - install horizontal impermeable layer to reduce rainfall infiltration.
Containment Barrier - install vertical dike to block horizontal movement of contaminant.
Excavate and Dispose - remove contaminated soil and dispose in approved site.
Excavate and Treat - remove contaminated soil and treat (includes spreading or land farming).
Remove Free Product - remove floating product from water table.
Pump and Treat Groundwater - generally approved to remove dissolved contaminants.
Enhanced Bioremediation - use of any available technology to promote bacterial decomposition of contaminants.
Replace Supply - provide alternative water supply to affected portion.
Treatment on Backup - install water treatment device at each dwelling or other place of use.
Vacuum Extract - use pumps or blowers to draw air through soil.
Vent Soils - core holes in soil to allow volatilization of contaminants.
No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.

SIGNATURE - Sign the form in the space provided.

DISTRIBUTION

If the form is completed on the leak over the telephone, mail the workplan and forward the remaining copies intact to your local tank permitting agency for distribution.

1. Original - Local Tank Permitting Agency
2. State Water Resources Control Board, Division of Clean Water Control, Underground Storage Tank Program, P.O. Box 840112, Sacramento, CA 95843-0120
3. Regional Water Quality Control Board
4. Local Health Officer and County Board of Supervisors or their designees as sensitive disposition as notifications.
5. Owner/responsible party.

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CA 94244-2120

(916) 227-4307

(916) 227-4530 FAX

10/16/90
November 22, 1993

7912

REGION: 2

ABOLGHASSEM RAZI

3609 E 14TH ST

OAKLAND, CA 94601

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, REQUEST FOR FURTHER DOCUMENTATION DURING CURSORY REVIEW: CLAIM NUMBER 7912

After reviewing your application for reimbursement from the Underground Storage Tank (UST) Cleanup Fund, we find that the following information is missing and must be submitted for conditional placement on the priority list:

- A permit to own or operate the UST (pursuant to Chapter 6.7 of the Health and Safety Code).
A copy of permit issued before 1/1/90 by Alameda County Health.
- Verification from the regulatory agency that an unauthorized release of petroleum from the UST was discovered on a specified date.
check w/ Alameda County Hlth.
- Documentation from the regulatory agency indicating that cleanup was initiated on or prior to 6/30/88 where the leak was discovered before 1/1/88. If the corrective action was not initiated on or before 6/30/88, you must provide documentation from the local regulatory agency stating that either no direction was given prior to 1/1/88 to initiate cleanup, or that direction was given not to cleanup.
Provide "date" unauthorize release was discovered, then submit required documentation if applicable.
- A copy of the court approved settlement, final judgment, etc. for a third party compensation claim.
- Additional priority class information including: If you are claiming Priority class B (small business), submit 1990, 1991, and 1992 tax returns including all attachments and schedules.

(over)

other: Sign the attached p. 8 of the application; submit a map of the site; and a copy of letter from Alameda County directing you to cleanup.

NOTE: Please return all requested documentation as soon as possible. Failure to respond within 30 calendar days from the date of this letter may result in the rejection of your claim.

If you have any questions, call Blessy Torres at (916) 227- 4595.

Sincerely,

Ron Markle

Ron Markle, Chief
Underground Storage Tank Cleanup Fund Unit

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

September 15, 1993
StID # 3337

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR
DEPARTMENT OF ENVIRONMENTAL AFFAIRS
State Water Board and the State
Division of Ocean Water Regulation
UST Local Oversight Program
80 Swan Way, RM 206
Oakland, CA 94621
(510) 271-4530

Mr. Abolghassem Razi
3609 E. 14th St.
Oakland CA 94601

**Re: Status of Subsurface Investigation at 3609 E. 14th St.,
Oakland CA 94601, Tony's Express Auto Service**

Dear Mr. Razi:

Enclosed please find the following items:

1. My August 6, 1993 letter requesting; the completion of an Unauthorized Release form and a copy of the work plan indicating the locations of borings and monitoring wells for the above site.
2. A blank Unauthorized Release (Leak) form.
3. Appendix A, a guidance document from the Regional Water Quality Control Board (RWQCB) outlining the common elements of a work plan for subsurface investigation.
4. A Notice of Requirement for Reimbursement and a explanation of its intent.

This information was sent via Certified Mail to your Pinole address early August, 1993, however, it was unclaimed and sent back to our office and received on September 14, 1993. Because of this, I will be sending all future correspondence to your business address.

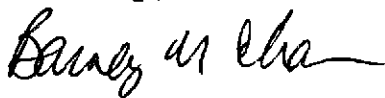
During a phone conversation with Noori Ameli of Alpha Geo Services, he said he was looking into whether his office had filled out an Unauthorized Release form. In addition, after the August 6, 1993 letter was written, our office received the August 5, 1993 proposed work plan from Soil Tech Engineering regarding borings and monitoring well installations. Therefore, you should disregard the request in the August 6, 1993 letter.

We are aware that the borings and monitoring wells have been installed and that a vapor extraction test will be performed to determine the viability of vapor extraction remediation. Please provide your boring and well installation report to our office within 30 days or by October 18, 1993.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
September 15, 1993
Page 2.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosure (Mr. Razi only)

cc: F. Hamed, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050
E. Howell, files

2wp-3609

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 15, 1993
StID # 3337

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

Mr. Abolghassem Razi
3609 E. 14th St.
Oakland CA 94601

**Re: Status of Subsurface Investigation at 3609 E. 14th St.,
Oakland CA 94601, Tony's Express Auto Service**

Dear Mr. Razi:

Enclosed please find the following items:

1. My August 6, 1993 letter requesting; the completion of an Unauthorized Release form and a copy of the work plan indicating the locations of borings and monitoring wells for the above site.
2. A blank Unauthorized Release (Leak) form.
3. Appendix A, a guidance document from the Regional Water Quality Control Board (RWQCB) outlining the common elements of a work plan for subsurface investigation.
4. A Notice of Requirement for Reimbursement and a explanation of its intent.

This information was sent via Certified Mail to your Pinole address early August 1993, however, it was unclaimed and sent back to our office and received on September 14, 1993. Because of this, I will be sending all future correspondence to your business address.

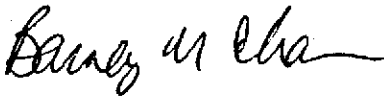
During a phone conversation with Noori Ameli of Alpha Geo Services, he said he was looking into whether his office had filled out an Unauthorized Release form. In addition, after the August 6, 1993 letter was written, our office received the August 5, 1993 proposed work plan from Soil Tech Engineering regarding borings and monitoring well installations. Therefore, you should disregard the request in the August 6, 1993 letter.

We are aware that the borings and monitoring wells have been installed and that a vapor extraction test will be performed to determine the viability of vapor extraction remediation. Please provide your boring and well installation report to our office **within 30 days or by October 18, 1993.**

Mr. A. Razi
StID # 3337
3609 E. 14th St.
September 15, 1993
Page 2.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosure (Mr. Razi only)

cc: ~~F. Hamed~~, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050
E. Howell, files

2wp-3609

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name TONY'S EXPRESS Today's Date 9/14/93
 Site Address 3699 E. 14th Street EPA ID# CA1000087674
 City OAKLAND Zip 94606 Phone 261-4444

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

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

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

LA GENERATOR (Title 22)

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

Comments:

The waste generated includes waste oil, Antifreeze, rags, batteries.

The waste oil Recovery systems recycle the waste oil - about 55 gallons / month
 Evergreen recycles Antifreeze - 160 gallons / year - monthly antifreeze back into the car. fast pickup at 4/92.

Battery is also recycled by independent batteries.
 Rag service is done by Arator.
 Absorbents / pads is used for spill
 All manifests was checked
 currently the place is boxed down by soap / water.

LB TRANSPORTER (Title 22)

- | | | |
|-------|---------------------------|-------|
| ___ | 32. Applic. Insurance | 66428 |
| ___ | 33. Comp. Cert./CHP Insp. | 66448 |
| ___ | 34. Containers | 66465 |
| <hr/> | | |
| ___ | 35. Vehicles | 66465 |
| ___ | 36. EPA ID #s | 66531 |
| ___ | 37. Correct | 66541 |
| ___ | 38. HW Delivery | 66543 |
| ___ | 39. Records | 66544 |
| <hr/> | | |
| ___ | 40. Name/ Covers | 66545 |
| ___ | 41. Recyclables | 66890 |

The Best Management Practices Handbook was given & waste minimization Handbook was given
 Recommendation -> Trucks should be labelled and good housekeeping is recommended.

Rev 6/88

Contact: [Signature]
 Title: _____
 Signature: _____

Inspector: Madhulika F
 Signature: _____

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RECEIVED AUG 19 1993

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

August 18, 1993
StID # 3337

Mr. Abolghassem Razi
3261 Ramona Street
Pinole, CA 94564

**Re: Evaluation of August 5, 1993 Work Plan for Subsurface
Investigation at 3609 E. 14th St., Oakland CA, Tony's
Express Station**

Dear Mr. Razi:

Our office has received and reviewed the above referenced work plan as prepared by Soil Tech Engineering. I have also spoken recently with Mr. Frank Hamedi of this company. This work plan calls for the advancing of ten borings around the former tank pit, piping run and product dispenser islands. A minimum of three monitoring wells would be converted from these borings in order to examine the groundwater impact from the petroleum fuel releases. This approach is adequate to determine the lateral and vertical extent of the soil contamination at this site. Our office would like to see, whenever possible, groundwater monitoring wells located within ten feet of the areas of significant soil contamination, in the verified downgradient direction. Using the inferred gradient of a site at 3750 E. 14th St., the groundwater direction is likely southwesterly, parallel to 36th Ave. Please keep this in mind when deciding on the locations of the monitoring wells.

Because of the high residual gasoline contamination left at this site, your next step should be the installation of vapor extraction wells and the performance of a vapor extraction test. Recall, your consultant chose not to excavate residual gasoline contamination, but chose to use an in-place remediation method such as soil-vapor extraction. It is thus crucial that a vapor extraction test be performed immediately to determine the viability of this technique. Please inform our office if this method is still the one of choice. Keep in mind that any request to leave contaminated soils in place will require the characterization of the contamination for hazardous properties, a leachability study to determine groundwater impact and a risk assessment of the human health and environmental impact of such residual contamination. Your technical report mentioned in item I of the work plan should give the progress and timetable for future activities at this site.

X

Mr. A. Razi
StID # 3337
3609 E. 14th St.
August 18, 1993
Page 2.

Please submit this technical report within 45 days of the completion of the boring and monitoring well installations.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
F. Hamedi, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050
E. Howell, files

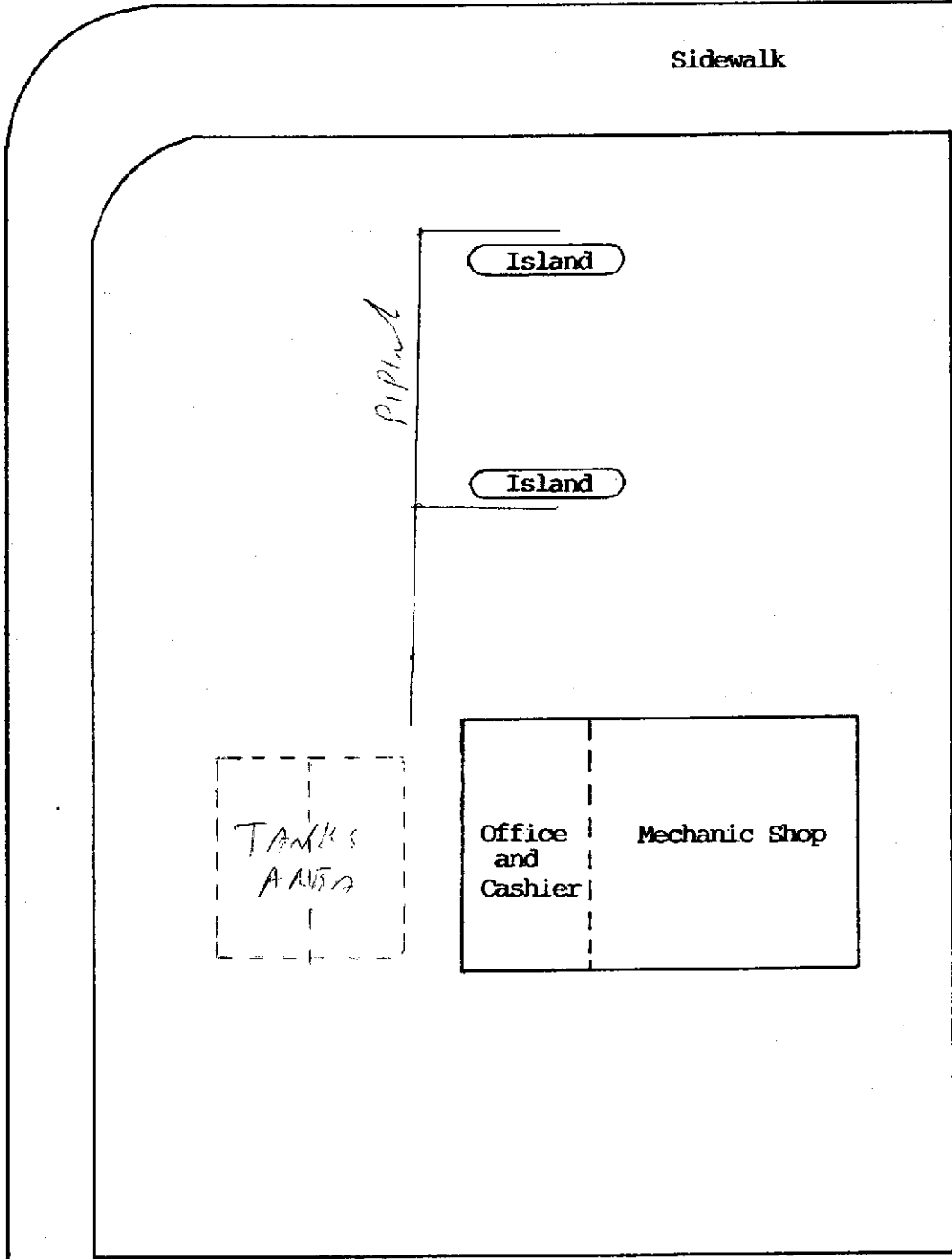
3-wp3609

EAST 14TH STREET



Sidewalk

36TH AVENUE



SCALE: 1"=20'

Figure

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

August 18, 1993
StID # 3337

Mr. Abolghassem Razi
3261 Ramona Street
Pinole, CA 94564

**Re: Evaluation of August 5, 1993 Work Plan for Subsurface
Investigation at 3609 E. 14th St., Oakland CA, Tony's
Express Station**

Dear Mr. Razi:

Our office has received and reviewed the above referenced work plan as prepared by Soil Tech Engineering. I have also spoken recently with Mr. Frank Hamedi of this company. This work plan calls for the advancing of ten borings around the former tank pit, piping run and product dispenser islands. A minimum of three monitoring wells would be converted from these borings in order to examine the groundwater impact from the petroleum fuel releases. This approach is adequate to determine the lateral and vertical extent of the soil contamination at this site. Our office would like to see, whenever possible, groundwater monitoring wells located within ten feet of the areas of significant soil contamination, in the verified downgradient direction. Using the inferred gradient of a site at 3750 E. 14th St., the groundwater direction is likely southwesterly, parallel to 36th Ave. Please keep this in mind when deciding on the locations of the monitoring wells.

Because of the high residual gasoline contamination left at this site, your next step should be the installation of vapor extraction wells and the performance of a vapor extraction test. Recall, your consultant chose not to excavate residual gasoline contamination, but chose to use an in-place remediation method such as soil-vapor extraction. It is thus crucial that a vapor extraction test be performed immediately to determine the viability of this technique. Please inform our office if this method is still the one of choice. Keep in mind that any request to leave contaminated soils in place will require the characterization of the contamination for hazardous properties, a leachability study to determine groundwater impact and a risk assessment of the human health and environmental impact of such residual contamination. Your technical report mentioned in item I of the work plan should give the progress and timetable for future activities at this site.

Mr. A. Razi
StID # 3337
3609 E. 14th St.
August 18, 1993
Page 2.

Please submit this technical report **within 45 days** of the completion of the boring and monitoring well installations.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
F. Hamedi, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050
E. Howell, files

3-wp3609

August 18, 1993
StID # 3337

Mr. Abolghassem Razi
3261 Ramona Street
Pinole, CA 94564

**Re: Evaluation of August 5, 1993 Work Plan for Subsurface
Investigation at 3609 E. 14th St., Oakland CA, Tony's
Express Station**

Dear Mr. Razi:

Our office has received and reviewed the above referenced work plan as prepared by Soil Tech Engineering. I have also spoken recently with Mr. Frank Hamedi of this company. This work plan calls for the advancing of ten borings around the former tank pit, piping run and product dispenser islands. A minimum of three monitoring wells would be converted from these borings in order to examine the groundwater impact from the petroleum fuel releases. This approach is adequate to determine the lateral and vertical extent of the soil contamination at this site. Our office would like to see, whenever possible, groundwater monitoring wells located within ten feet of the areas of significant soil contamination, in the verified downgradient direction. Using the inferred gradient of a site at 3750 E. 14th St., the groundwater direction is likely southwesterly, parallel to 36th Ave. Please keep this in mind when deciding on the locations of the monitoring wells.

Because of the high residual gasoline contamination left at this site, your next step should be the installation of vapor extraction wells and the performance of a vapor extraction test. Recall, your consultant chose not to excavate residual gasoline contamination, but chose to use an in-place remediation method such as soil-vapor extraction. It is thus crucial that a vapor extraction test be performed immediately to determine the viability of this technique. Please inform our office if this method is still the one of choice. Keep in mind that any request to leave contaminated soils in place will require the characterization of the contamination for hazardous properties, a leachability study to determine groundwater impact and a risk assessment of the human health and environmental impact of such residual contamination. Your technical report mentioned in item I of the work plan should give the progress and timetable for future activities at this site.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

August 6, 1993
StID 3337

Mr. Abolghassem Razi
3261 Ramona Street
Pinole, CA 94564

**Re: Request for Work Plan for Subsurface Investigation for
Tony's Express Auto Service, 3609 E. 14th St., Oakland,
CA 94601**

Dear Mr. Razi:

Our office has received and reviewed the July 27, 1993 report from Soil Tech Engineering which details the removal of the three underground tanks from the above site. As you are aware, residual gasoline contamination remains within the north side of the former gasoline tank pit and within the areas of the fuel dispenser islands. It does appear, however, that overexcavation was successful in removing the waste oil contamination observed during the day of the tank removals. Concentrations as high as 640 mg/kg (ppm) TPHg (Total Petroleum Hydrocarbons as gasoline) was found within the fuel tank pit and up to 4100 ppm TPHg was found along the northern dispenser piping run.

Our office uses the **Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites**, commonly called the Tri-Regional Board Guideline, to determine when a soil/groundwater investigation is required subsequent to a tank removal. Because of the contamination which was observed and that which still remains at this site, you are required to provide a work plan which will determine the extent and propose a method to remediate any soil and groundwater contamination.

Enclosed please find a copy of **Appendix A**, a guidance document from the Regional Water Quality Control Board (RWQCB), which outlines the common elements of a work plan to determine soil and groundwater contamination. In addition, enclosed you will find an **Underground Storage Tank Unauthorized Release (Leak)/ Contamination Site Report (ULR)**. Please complete this form and return to our office **within 10 days of receipt**. The completion and submittal of this form is required under the Underground Tank Regulations, Title 23, Chapter 16, Section 2652.

Mr. A. Razi
StID # 3337
3609 E 14th St.
August 6, 1993
Page 2.

Upon review of the above referenced report, our office has the following comments and requirements:

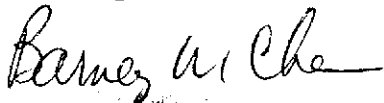
1. It was noticed that the new underground tanks were set and the former tank pit may have had additional excavation to prepare the pit. Was any additional sampling performed after this?
2. Please be aware that your failed to run Method 8270, semi-volatiles, on the waste oil soil samples. Be aware this analysis should be run on the downgradient well from this former tank pit.
3. Please inform our office what will done with the stockpiled soils from this site. Be aware additional sampling will be required for any reuse.

I have recently spoke with Mr. Frank Hamedi of Soil Tech Engineering. He has described his intentions of performing borings to determine the extent of the soil contamination. He also stated that he is proposing soil vapor extraction as a remediation method plus the installation of at least three monitoring wells. I stressed the need for him to submit a work plan for our office's review and input prior to performing the work and the need for our office to be informed prior to the actual performance for the purpose of witnessing the work. Please provide an appropriate work plan as described above, to our office **within 30 days or by September 8, 1993.**

You should be aware that this is a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requeste documents may subject you to civil liabilities.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosures (Mr. Razi)

cc: G. Jensen, Alameda County District Attorney Office
F. Hamedi, Soil Tech Engineering, 298 Brokaw Road, Santa Clara, CA 95050
E. Howell, files
wp-3609E14



LT. CHOYCE
FIRE PREVENTION BUREAU

PHONE (510)
238-3851

on Form

Site ID# _____

Express Today's Date *7/26/93*

Site Address _____

EPA ID# _____

City *OAKLAND, CA*

Zip *94709*

Phone *(510)*

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

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

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

I.A GENERATOR (Title 22)

- ___ 1. Waste ID 66471
- ___ 2. EPA ID 66472
- ___ 3. > 90 days 66508
- ___ 4. Label dates 66508
- ___ 5. Biennial 66493

- ___ 6. Records 66492
- ___ 7. Correct 66484
- ___ 8. Copy sent 66492
- ___ 9. Exception 66484
- ___ 10. Copies Rec'd 66492

- ___ 11. Treatment 66371
- ___ 12. On-site Disp. (H.S.&C.) 26189.5
- ___ 13. Ex Haz. Waste 66570

- ___ 14. Communications 67121
- ___ 15. Aisle Space 67124
- ___ 16. Local Authority 67126
- ___ 17. Maintenance 67120
- ___ 18. Training 67105

- ___ 19. Prepared 67140
- ___ 20. Name List 67141
- ___ 21. Copies 67141
- ___ 22. Eng. Coord. Trng. 67144

- ___ 23. Condition 67241
- ___ 24. Compatibility 67242
- ___ 25. Maintenance 67243
- ___ 26. Inspection 67244
- ___ 27. Buffer Zone 67246
- ___ 28. Tank Inspection 67259
- ___ 29. Containment 67245
- ___ 30. Safe Storage 67261
- ___ 31. Freeboard 67257

I.B TRANSPORTER (Title 22)

- ___ 32. Applic./Insurance 66428
- ___ 33. Comp. Cert./CHP Insp. 66448
- ___ 34. Containers 66465

- ___ 35. Vehicles 66465
- ___ 36. EPA ID #s 66531
- ___ 37. Correct 66541
- ___ 38. HW Delivery 66543
- ___ 39. Records 66544

- ___ 40. Name/ Covers 66545
- ___ 41. Recyclables 66800

Comments:

Randy Johnson from Johnson Johnson Testing did the secondary pipe testing. Paul and Smith from the Alameda County and LT. Choyce from the fire prevention bureau were there. All the couplings were checked & it was O.K. The vapor line ran out of pressure and it had to be repressured - 5 pounds. Before testing the secondary pipes were pressurized - 5 pounds over the weekend for more than 48 hours.

Contact: _____

Title: _____

Signature: *Randy Johnson*

Inspector: *Madhulla Logan*

Signature: *Madhulla Logan*

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Inspection Form

II, III

II.A BUSINESS PLANS (Title 19)

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

II.B ACUTELY HAZ MATLS

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

III. UNDERGROUND TANKS (Title 23)

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

Site ID # _____ Site Name Tomys Express Auto Ser Today Date 7/13/93
 Site Address 3609 E 14th St
 City Oak Zip 94601 Phone 261-4444

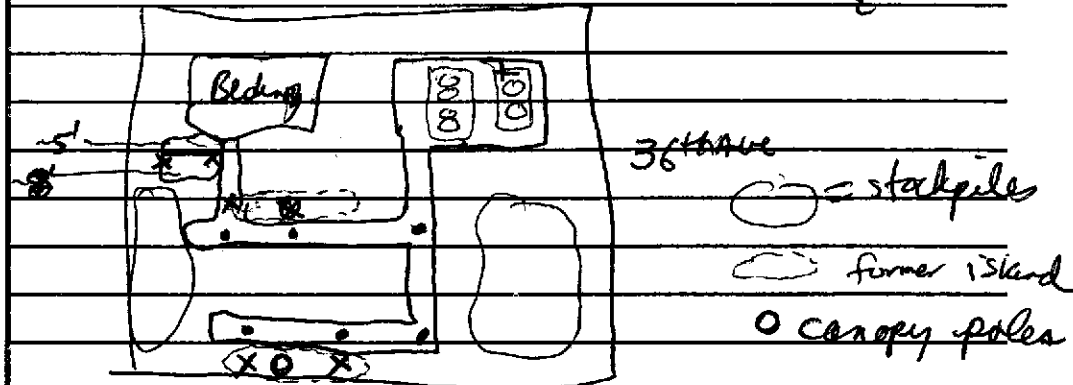
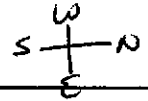
___ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

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

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

Comments:



E. 14th St

Witness soil splen, after dispenser, piping had been removed & after over excavation of former waste oil pit Norri of Alpha Geo Service present - splen piping run has been excavated to ~ 8' depth
 Splen @ • piping X - under former dispenser
 Estimate stockpile amt $40 \times 20 \times 8 / 30 = 250$ $30 \times 10 \times 10 / 30 \approx 100$
 Dispenser splen taken ~ 2' under former dispenser location
 Odor observed on NE island, SE piping, NE piping, NE corner piping, NW island (hot)
 - Waste oil tank splen on N/S end in deeper end (R) X

Rev 6/88

Contact: Norri Ameli
 Title: _____
 Signature: [Signature]

Inspector: B Chen
 Signature: [Signature]

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Certified Mail # P 418 724 604

07/06/93
STID# 3337

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

Notice of Requirement to Reimburse

A. & I. Razi
Tony's Express Auto Service
3609 E14th St.
Oakland Ca 94601

Responsible Party
Property Owner

Tony's Express Auto Service
3609 E. - 14th St.
Oakland , CA 94601

SITE

Date First Reported 07/01/93
Substance: waste oil
Petroleum: (X)Yes

The federal Petroleum Leaking Underground Storage Tank Trust Fund (Federal Trust Fund) provides funding to pay the local and state agency administrative and oversight costs associated with the cleanup of releases from underground storage tanks. The legislature has authorized funds to pay the local and state agency administrative and oversight costs associated with the cleanup of releases from underground storage tanks. The direct and indirect costs of site investigation or remedial action at the above site are funded, in whole or in part, from the Federal Trust Fund. The above individual(s) or entity(ies) have been identified as the party or parties responsible for investigation and cleanup of the above site. **YOU ARE HEREBY NOTIFIED** that pursuant to Title 42 of the United States Code, Section 6991b(h)(6) and Sections 25297.1 and 25360 of the California Health and Safety Code, the above Responsible Party or Parties must reimburse the State Water Resources Control Board not more than 150 percent of the total amount of site specific oversight costs actually incurred while overseeing the cleanup of the above underground storage tank site, and the above Responsible Party or Parties must make full payment of such costs within 30 days of receipt of a detailed invoice from the State Water Resources Control Board.

Please contact Barney CHAN, Hazardous Materials Specialist at this office if you have any questions concerning this matter.

Edgar B. Howell, III, Chief
Contract Project Director

cc: Sandra Malos, SWRCB

SWRCB Use:

Add: X Reason: New Case

If you have any questions or require additional information,
please feel free to contact me at (510) 261-4444.

Sincerely,

Abolghassem Razi

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

①

Site ID# 3337 Site Name Tony's Express Auto Service Today's Date 7/1/93
 Site Address 3609 E14th St EPA ID# _____
 City Oak Zip 94601 Phone _____

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

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks Removal

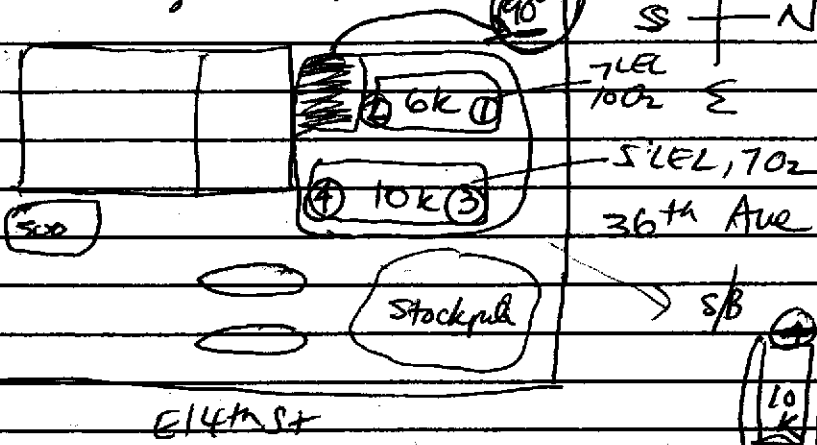
The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A. GENERATOR (Title 22)

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

Comments:

Frank Hamed - Alpha Glo Services
 3 USTS - 1-10K, 1-6K gasoline
 and 1-500 gallon waste oil
 tanks are single wall + steel



H&H - Tank hauler # 401994 exp 1/94
 Mr. Abolghassen Raza, property + business owner "Tony"
 pit is approx. 30' x 35' x 12', no water
 Spillpail is approx 30x30 x 10 = 9000 gal approx
 OF Inspector - Gil Coody
 Approved tank removal

I.B. TRANSPORTER (Title 22)

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

Contact: _____

Title: _____

Signature: [Signature]

Inspector: BChan

Signature: _____

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

2

Site ID# 3337 Site Name Tony's Express Auto Today's Date 7/1/93
 Site Address 3901 E 14th EPA ID# _____
 City Oakland Zip 94601 Phone _____

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

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

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

IA GENERATOR (Title 22)

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

Comments:

Manifest # 92215773 (10k)
 10k tank - no apparent holes
 other H+H trailers I # 401998 exp 1/94
 Manifest # 92215775 (6k + 500 gal)
 1 cu yd of stock pile for 550 gal tank
 6k tank - no apparent holes
 STO tank O/W LEL, 1500 Oz
 W/O tank has 2 holes on the N end
 Δ dischg only sludge & water into pit
 ~ 75 gal was collected from tank +
 tank pit (oil + water + sludge)
 a total of ~ 200 gal of water + oily sludge removed
 Spl 1 from N end of 6k tank - gray clay odor
 Spl 2 from S end of 6k tank - blue gray clay odor
 Spl 3 from N end 10k tank " " " " odor
 Spl 4 from S end 10k " " " " "
 Will return on 7/2/93 to sample beneath the
 piping run & under W/O tank.

IB TRANSPORTER (Title 22)

- | | | |
|--|--|-------|
| | <input type="checkbox"/> 32. Applic./Insurance | 66428 |
| | <input type="checkbox"/> 33. Comp. Cert./CHP Insp. | 66448 |
| | <input type="checkbox"/> 34. Containers | 66465 |
| | <input type="checkbox"/> 35. Vehicles | 66465 |
| | <input type="checkbox"/> 36. EPA ID #s | 66531 |
| | <input type="checkbox"/> 37. Correct | 66541 |
| | <input type="checkbox"/> 38. HW Delivery | 66543 |
| | <input type="checkbox"/> 39. Records | 66544 |
| | <input type="checkbox"/> 40. Name/ Covers | 66545 |
| | <input type="checkbox"/> 41. Recyclables | 66800 |

Rev 6/88

Contact: _____

Title: _____

Signature: [Signature]

Inspector: BChm

Signature: [Signature]

2/6 Abolghassem & Iran Razi
3261 Ramona St
Pinole CA 94564

DATE: 7/1/93

TO : Local Oversight Program

FROM: B Chan

SUBJ: Transfer of Eligible Oversight Case

As date reported to 7/1/93

~~3231~~

Site name: Tony's Express Auto Service

Address: 3609 E 14th St city Oakland zip 94601

Closure plan attached? Y N DepRef remaining \$ _____

DepRef Project # U 704456 STID #(if any) 3 33 7

Number of Tanks: 3 removed? Y N Date of removal 7/1/93

Leak Report filed? Y N Date of Discovery 7/1/93

Samples received? Y N Contamination: waste oil 12035

Petroleum Y N Types: Avgas Jet Leaded unleaded Diesel
fuel oil waste oil kerosene solvents

Monitoring wells on site 0 Monitoring schedule? Y N

LUFT category 1 2 3 * H S C A R W G O

Briefly describe the following:

Preliminary Assessment _____

Remedial Action _____

Post Remedial Action Monitoring _____

Enforcement Action _____

Release of waste oil from dented tank occurred during tank removal. Considerable soil contamination exists.

DEPOSIT/REFUND PROJECT LISTING

Date 02/17/93

Page 12

Zip	Site Address	City	Facility Name	// Site# / Contr# /// Rcpt # List			PROJLST	TYPE	# TANKS	DATE	
				//	---	/				---	///
550	2920 - 4th St.	Liverm	Montclair House & Garden	//	561 /	220 ///	542361	T	2	GW	06/07/89
550	800 E. Airway Blvd.	Liverm	Complete Auto & R V Service	//	2019 /	388 ///	668844, 577019	R	1	GW	08/27/90
550	580 E. Altamont Pass Rd.	Liverm	G T E Mobilnet, #099 A-1785	//	3022 /	440 ///	577122	A	1	GW	11/13/90
550	10840 Altamont Pass Rd.	Liverm	Altamont Gas Recovery	//	210 /	99 ///	524510, 528796, 552988	I	1	LM	06/23/88
550	15600 Altamont Pass Rd.	Liverm	A T & T	//	366 /	112 ///	528766	I		GW	12/07/88
550	Altamont Pass Rd.	Liverm		//	1998 /	655 ///	604998	M		JS	09/14/92
550	4951 Arroyo Rd.	Liverm	D V A Medical Center	//	2076 /	299 ///	592330, 577076	R	2	GW	10/09/90
550	178 Barber St.	Liverm	Magnum Construction	//	1080 /	389 ///	568980	R	1	GW	07/23/90
550	1925 Barcelona St.	Liverm	Chevron Station #7314	//	635 /	6 ///	552835	R	4	GW	07/31/89
550	909 Bluebell Dr.	Liverm	Springtown Arco	//	1767 /	581 ///	612167	R	1	SH	12/09/91
550	N. Canyons Pkwy.	Liverm	Boulangerie De France	//	2007 /	395 ///	577007	I		GW	08/21/90
550	1175 Catalina	Liverm	Exxon Corporation	//	1999 /	265 ///	604999	R	3	JS	09/14/92
550	2838 College Ave.	Liverm	Parcel	//	2016 /	397 ///	577016	R	1	GW	08/23/90
550	3033 Collier Canyon Rd	Liverm	Chabot Las Positas Communit	//	6030 /	71 ///	612030	T	4	RA	08/07/91
550	7000 Del Valle	Liverm	Del Valle Regional Park	//	1815 /	597 ///	604815	R		JS	02/07/92
550	4008 Dyer St.	Liverm		//	/	///					12/01/87
550	7000 East Ave.	Liverm	L L N L - 241-31 R	//	574 /	135 ///	542374	MOD	1	LM	06/12/89
550	7000 East Ave.	Liverm	L L N L - 298	//	1799 /	225 ///	612199	M		LM	01/24/92
550	7000 East Ave.	Liverm	L L N L - 322/414	//	554 /	225 ///	528736,	R		LM	10/31/88
550	7000 East Ave.	Liverm	L L N L University - 318	//	597 /	225 ///	542397	R	1	LM	06/26/89
550	7000 East Ave.	Liverm	L L N L - 141	//	851 /	225 ///	565651	R	1	LM	01/29/90
550	7000 East Ave.	Liverm	L L N L - 131	//	698 /	218 ///	552898	R		LM	09/21/89
550	7000 East Ave.	Liverm	L L N L - 141 - R3 U1	//	827 /	218 ///	565627	R	1	LM	01/12/90
550	7000 East Ave.	Liverm	L L N L - #325 - I1u1	//	1813 /	225 ///	604813	R	1		02/06/92
550	7000 East Ave.	Liverm	L L N L - 231 - R2 U1	//	687 /	218 ///	552887	R	1	JS	09/14/89
550	7000 East Ave.	Liverm	L L N L - 111	//	909 /	225 ///	568809	R	1	LM	03/19/90
550	7000 East Ave.	Liverm	L L N L - 194	//	/	///					12/01/87
550	7000 East Ave.	Liverm	L L N L - 341- D1 U1	//	684 /	135 ///	552884	R	1	LM	09/13/89
550	7000 East Ave.	Liverm	L L N L - 403	//	938 /	225 ///	568838	R	4	LM	04/12/90
550	7000 East Ave.	Liverm	L L N L - 419	//	842 /	225 ///	565642	R	1	LM	01/24/90
550	7000 East Ave.	Liverm	L L N L - 239 - D1 U1	//	825 /	218 ///	565625	R	1	LM	01/12/90
550	7000 East Ave.	Liverm	L L N L #424 - D1u1	//	1817 /	225 ///	604817	R	1		02/13/92

TYPES: R - Removal I - Installation M - Mitigation MOD - Modification P - Penalty BP - Bldg.Permit W - Well Point Survey
A - Above Ground Tank C - Closure In Place

Questions:

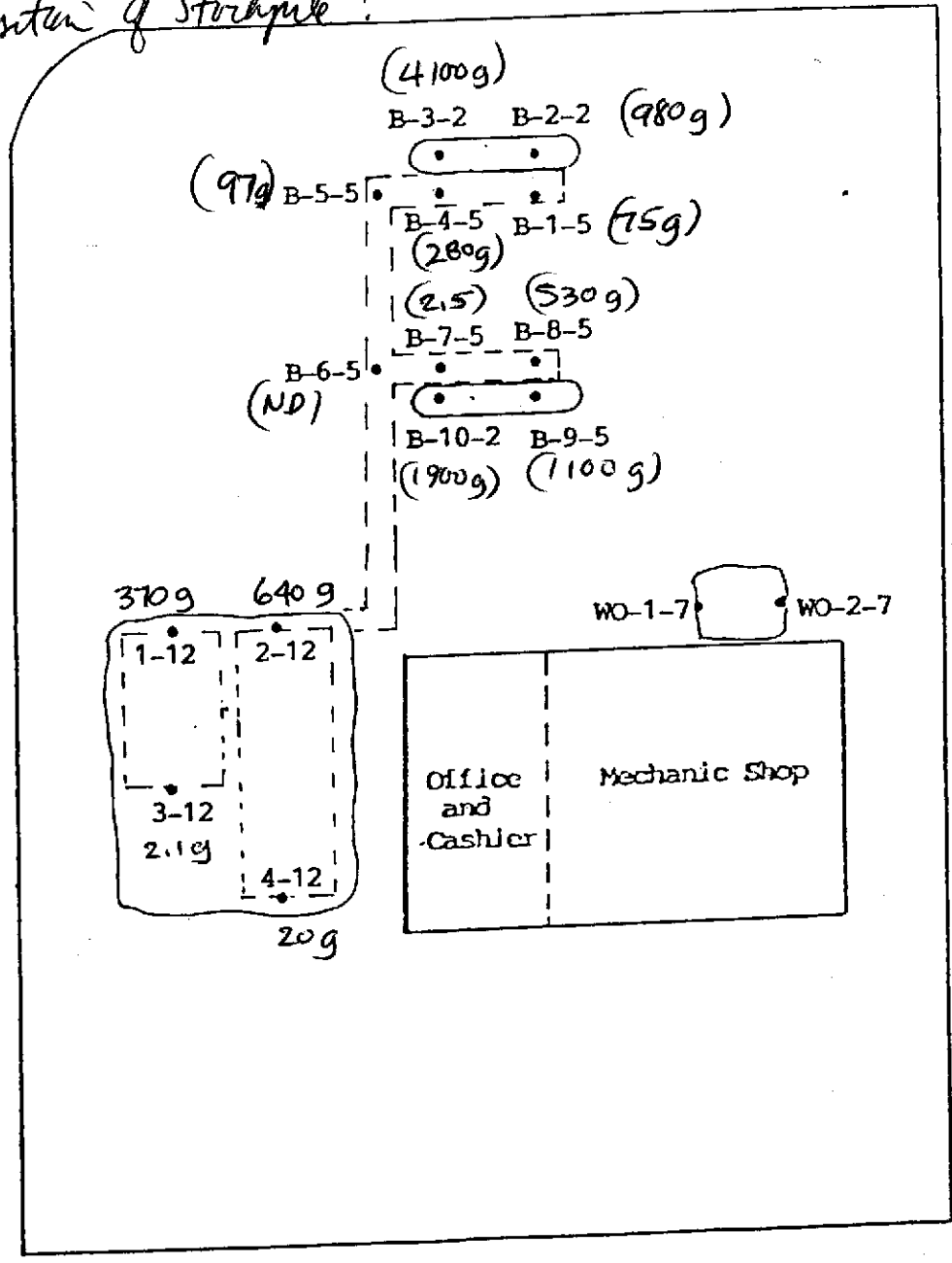
- ① Any overexcavation to set tank? , Any sample?
- ② need to run 8270 on a w/o sple per approved plan + T.R.G.
- ③ the ~~stockpile~~ stockpile from w/o EAST 14TH STREET needs to be run for w/o parameters for any reuse.

Stockpile amt ≈ 350 cy

Sidewalk

④ Final disposition of Stockpile?

36TH AVENUE



SCALE: 1"=20'

Figure 2

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 510/271-4320

Barney Chan

OK 6/28/93 bc

*Subject to receiving
 Abolghassem Razi's
 papers from + state
 address in Alameda*

*Contact in Office 72 hrs
 prior to tank removal*

Identity REEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH
 470 - 47th Street, 4th Floor
 Oakland, CA 94612
 Telephone: (415) 263-2337

These plans have been reviewed and found to be acceptable and meet the requirements of State and local health laws. Changes to your plans indicated by the Department are to assure compliance with State and local laws. The original proposed plans to be reviewed for the area of any minor building permits for construction.

One copy of these excavator plans must be on the job and available to all contractors and craftsmen involved with the removal.

Any copies or alterations of these plans and specifications must be submitted to the Department and to the local health department. Penalties for violations of these provisions may be assessed if they are not followed. The Department will not be held responsible for any following required inspections:

- Removal of Tank and Piping
- Sampling
- Final Inspection

Inspection is subject to change and is dependent on the presence of escaped pits and all applicable local health laws.

Approved: _____
 Title: _____

UNDERGROUND TANK CLOSURE PLAN

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

1. Business Name Tony's Express Auto Service
 Business Owner Abolghassem Razi

2. Site Address 3609 East 14th Street 261-4444
 City Oakland, CA Zip 94601 Phone ~~510-614-3339~~

3. Mailing Address 3609 East 14th Street
 City Oakland, CA Zip 94601 Phone 510-614-3339

4. Land Owner Abolghassem Razi
 Address ~~3216~~ ³²⁶¹ Ramona Street City, State Pinole, CA Zip 94564

5. Generator name under which tank will be manifested _____
Abolghassem Razi

EPA I.D. No. under which tank will be manifested CAL000087674

6. Contractor Alp Geo Services
Address 298 Brokaw Road
City Santa Clara, CA 95050 Phone 408-988-1032
License Type* General "A" & C57 ^{Hz?} ID# 507520

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant Soil Tech Engineering, Inc.
Address 298 Brokaw Road
City Santa Clara, CA 95050 Phone 408-496-0265

8. Contact Person for Investigation
Name Frank Hamedi Title General Manager
Phone 408-496-0265

9. Number of tanks being closed under this plan 3
Length of piping being removed under this plan 35-40 ?
Total number of tanks at facility 3

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

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

a) Product/Residual Sludge/Rinsate Transporter

Name Erickson, Inc. EPA I.D. No. CAD0009466392
Hauler License No. 0019 License Exp. Date 5/97
Address 255 Parr Boulevard
City Richmond State CA Zip 94801

b) Product/Residual Sludge/Rinsate Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD0009466392
Address 255 Parr Boulevard
City Richmond State CA Zip 94801

c) Tank and Piping Transporter

Name Erickson, Inc. EPA I.D. No. CAD0009466392
Hauler License No. 0019 License Exp. Date 5/97
Address 255 Parr Boulevard
City Richmond State CA Zip 94801

d) Tank and Piping Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD0009466392
Address 255 Parr Boulevard
City Richmond State CA Zip 94801

11. Experienced Sample Collector

Name Noori Ameli
Company Soil Tech Engineering, Inc.
Address 298 Brokaw Road
City Santa Clara State CA Zip 95050 Phone 408-496-0265

12. Laboratory

Sub - Supervision of maintenance for GC/MS work
Name Priority Environmental Labs *Phone - 408 946-9636*
Address 1764 Houret Court
City Milpitas State CA *Smith* Zip 95035
State Certification No. 1708

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

If yes, describe. _____

14. Describe methods to be used for rendering tank inert

Dry ice.

15-20# / 1000 gal capacity

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

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
10,000	gasoline	Soil & groundwater if present	Soil/backfill intergrade into 2' of native soil. <i>2 samples at end</i>
6,000	gasoline	Soil & groundwater if present	Soil/backfill intergrade into 2' of native soil. <i>2 samples at end</i>
500	waste oil	Soil & groundwater if present	Soil/backfill intergrade into 2' of native soil. <i>1 sample at end</i>
		<i>Soil @ minimum 1/20' of piping near transfer dispensers</i>	

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

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	<p>Sampling Plan</p> <p>Soil samples will be placed in brass tubes, sealed with Teflon tape and plastic caps. Samples must be placed on ice and transported to a state-certified lab with chain-of-custody.</p> <p><i>1/2004 for reuse, 1/5004 (composite of 4) for disposal</i></p>

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

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

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

	Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
GASOLINE TANKS	TPH-G	5030 / 8015		150 ppm
	BTEX	8020 or 8240		5 ppb
	Total Lead	3010/3050 - AA or ICAP		
WASTE OIL TANK	TPH-G	5030 / 8015		150 ppm
	TPH-D	3550 / 8015		
	BTEX	8020 or 8240		
	TO&G	5520 D&F		50 ppm
	CL HC <i>Semi-volatile</i> HEAVY METALS: Cr, Cd, Ni, Pb, Zn	8010 or 8240 8210 AA or ICAP		

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Compensation Insurance Fund

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

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

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

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

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

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

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

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

Signature of Contractor

Name (please type) Frank Hamedi

Signature *Frank Hamedi*

Date 6/22/93

Signature of Site Owner or Operator

Name (please type) Abolghassem Razi

Signature *Abolghassem Razi*

Date 6/22/93

EAST 14TH STREET



Sidewalk

36TH AVENUE

Island

Island

W.O.

6K gal. tank
10K gal. tank

Office and Cashier	Mechanic Shop
--------------------	---------------

piping runs?

SCALE: 1"=20'

INSTRUCTIONS

General Instructions

- * Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- * Any cutting into tanks requires local fire department approval.
- * One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.
- * State of California Permit Application Forms A and B are to be submitted to this office. One Form A per site, one Form B for each removed tank.

Item Specific Instructions

2. SITE ADDRESS
Address at which closure is taking place.
5. EPA I.D. NO. under which the tanks will be manifested
EPA I.D. numbers may be obtained from the State Department of Health Services, 916/324-1781.
6. CONTRACTOR
Prime contractor for the project.
10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
 - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
 - c) Tanks must be hauled as hazardous waste.
 - d) This is the place where tanks will be taken for cleaning.
15. TANK HISTORY AND SAMPLING INFORMATION

Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS
See attached Table 2.

17. SITE HEALTH AND SAFETY PLAN

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer;
- b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;
- c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;
- d) For each hazard, identify the action levels (contaminant concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions;
- e) Description of the work habit changes triggered by the above action levels or physical conditions;
- f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies;
- g) Confined space entry procedures (if applicable);
- h) Decontamination procedures;
- i) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, plastic sheeting, security guards, etc.);
- j) Spill containment/emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;
- k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and
- l) Page for employees to sign indicating they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.

NOTE: These requirements are excerpts from 29 CFR Part 1910.120(b)(4), Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN

The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale;
- b) North Arrow;
- c) Property Lines;
- d) Location of all Structures;
- e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
- f) Streets;
- g) Underground conduits, sewers, water lines, utilities;
- h) Existing wells (drinking, monitoring, etc.);
- i) Depth to ground water; and
- j) All existing tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT

The tank closure report should contain the following information:

- a) General description of the closure activities;
- b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.

TABLE #2
RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR
UNDERGROUND TANK LEAKS

<u>HYDROCARBON LEAK</u>	<u>SOIL ANALYSIS</u>	<u>WATER ANALYSIS</u>
Unknown Fuel	TPH G GCFID(5030) TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) TPH D GCFID(3510) BTX&E 602, 624 or 8260
Leaded Gas	TPH G GCFID(5030) BTX&E 8020 OR 8240 TPH AND BTX&E 8260 TOTAL LEAD AA -----Optional----- TEL DHS-LUFT EDB DHS-AB1803	TPH G GCFID(5030) BTX&E 602 or 624 TOTAL LEAD AA TEL DHS-LUFT EDB DHS-AB1803
Unleaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) BTX&E 602, 624 or 8260
Diesel, Jet Fuel and Kerosene	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Fuel/Heating Oil	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Chlorinated Solvents	CL HC 8010 or 8240 BTX&E 8020 or 8240 CL HC AND BTX&E 8260	CL HC 601 or 624 BTX&E 602 or 624 CL HC AND BTX&E 8260
Non-chlorinated Solvents	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602 or 624 TPH and BTX&E 8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G GCFID(5030) TPH D GCFID(3550) TPH AND BTX&E 8260 O & G 5520 D & F BTX&E 8020 or 8240 CL HC 8010 or 8240	TPH G GCFID(5030) TPH D GCFID(3510) O & G 5520 C & F BTX&E 602, 624 or 8260 CL HC 601 or 624
	ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni METHOD 8270 FOR SOIL OR WATER TO DETECT: PCB* PCP* PNA CREOSOTE	PCB PCP PNA CREOSOTE

* If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.
2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.
5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydrocarbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).
7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).
8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. Standard Methods" 17th Edition, 1989, has changed the 503 series to 5520.
9. PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:

	<u>SOIL PPM</u>	<u>WATER PPB</u>
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&E	0.005	0.5
O & G	50.0	5,000.0

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

ROUTINE	MODIFIED PROTOCOL
≤ 10 ppm (42%)	≤ 10 ppm (10%)
≤ 5 ppm (19%)	≤ 5 ppm (21%)
≤ 1 ppm (35%)	≤ 1 ppm (60%)

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

- LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.
- IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chromatogram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

- REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.

**HEALTH AND SAFETY PLAN
FOR
TONY'S EXPRESS AUTO SERVICE
3609 EAST 14TH STREET
OAKLAND, CALIFORNIA**

GENERAL:

This Health and Safety Plan (HSP) contains the minimum requirements for the subject site and tank removal. The field activities include: removal of product, excavation, product lines, triple washing the tank, sampling rinsate, removing rinsate with vactruck, removing the tank, and proper disposal. All personnel and contractors will be required to strictly adhere to these HSP requirements.

The objective of the HSP plan is to describe procedures and actions to protect the worker, as well as unauthorized person, from inhalation and ingestion of, and direct skin contact with potentially hazardous materials that may be encountered at the site. The plan describes (1) personnel responsibilities and (2) protective equipment to be used as deemed when working on the site. At a minimum, all personnel working at the site must read and understand the requirements of this HSP. A copy of this HSP will be on-site, easily accessible to all staff and government field representative.

ALPHA GEO SERVICES

PERSONNEL RESPONSIBILITIES:

The key personnel directly involved in the investigation will be responsible for monitoring the implementation of safe work practices and the provisions of this plan are (1) Alpha Geo Services (AGS) supervisor, Mr. Richard Manley and (2) Soil Tech Engineering, Inc. (STE) project field engineer, Mr. Noori Ameli. These personnel are responsible for knowing the provisions of the plan, communicating plan requirements to workers under their supervision and regulatory agencies inspectors and for enforcing the plan.

The personnel-protective equipment will be selected to prevent field personnel from exposure to fuel hydrocarbons that may be present at the site. To prevent direct skin contact, the following protective clothing will be worn as appropriate while working at the site:

1. Tyvek coveralls.
2. Butyl rubber or disposable vinyl gloves.
3. Hard hat with optional face shield.
4. Steel toe boots.
5. Goggles or safety glasses.

The type of gloves used will be determined by the type of work being performed. Excavation and tank removal personnel will be required to wear butyl rubber gloves because they may have long

duration contact with the subsurface materials. The triple washing (decontaminated) and vactruck crews shall wear butyl rubber gloves as they may have long duration contact with the rinsate. STE sampling staff will wear disposable gloves when handling any sample. These gloves will be changed between each sample.

Tank destruction and removal personnel will be required to wear hard hats and when appropriate wear a protective face shield.

Personnel protective equipment shall be put on before entering the immediate work area. The sleeves of the overalls shall be outside of the cuffs of the gloves to facilitate removal of clothing with the least potential contamination of personnel. If at any time protective clothing (coveralls, boots or gloves) become torn, wet or excessively soiled, it will be replaced immediately.

Total organic vapors will be monitored at the site with a portable PID and portable LEL meter. Should the total organic vapor content approach that of the threshold limit value (TLV) for any of the substances listed in Table 1, appropriate safety measures will be implemented under the supervision of the site project engineer. These precautions include, but are not limited to, the following: (1) Donning of respirators (with appropriate cartridges) by site personnel, (2) forced ventilation of the site, (3) shutdown of work until such time as appropriate safety measures sufficient to insure the health and safety of site personnel can be implemented.

TABLE 1
THRESHOLD LIMIT VALUES
FOR
COMMON GASOLINE CONSTITUENTS

Benzene	10 ppm
Toluene	100 ppm
Ethylbenzene	100 ppm
Xylenes	100 ppm

No eating, drinking or smoking will be allowed in the vicinity of the drilling operations. AGS will designate a separate area on-site for eating and drinking. Smoking will not be allowed at the vicinity of the site except in designated areas. No contact lenses will be worn by field personnel.

WORK ZONES AND SECURITY MEASURES:

The project engineer will call Underground Service Alert (USA), and the utilities will be marked before any excavation is conducted on-site, and excavation will be at safe distances from the utilities. The client will also be advised to have a representative on-site to advise us in selecting locations of piping trenches with respect to utilities, underground or above ground structures. AGS assumes no responsibility to utilities not so located. The excavation will be hand dig or using small power tools. Each of the areas where the tank or piping will be excavated will be designated as exclusion zones. Only essential

personnel will be allowed into an exclusion zone. When it is practical and local topography allows, approximately 25 to 75 feet of space surrounding those exclusion zones will be designated as contamination reduction zones.

Cones, wooden barricades or a suitable alternative will be used to deny public access to these contamination reduction zones excavation area. The general public will not be allowed closed to the work area under any conditions. If for any reason the safety of a member or the public (e.g. motorists or pedestrians) may be endanger, work will cease until the situation is remedied. Cones and working signs will be used when necessary to redirect motorists or pedestrians.

LOCATION AND PHONE NUMBERS OF EMERGENCY FACILITIES:

The fire department and hospital addresses and phone numbers are listed below:

City of Oakland Fire Department

991

Merritt Peralta Hospital
675 Hegenberger Road, Oakland, CA

~~(510) 652-3992~~

ADDITIONAL CONTINGENCY TELEPHONE NUMBERS:

Poison Control Center (800) 523-2222

Soil Tech Engineering Administrative Office (408) 496-0265
CHEMTREC (800) 424-9300

NOTE: Only call CHEMTREC stands for Chemical Transportation Emergency Center, a public service of the Chemical Manufacturer's Association. CHEMTREC can usually provide hazard information, warnings and guidance when given the identification number or the name of the product and the nature of the problem. CHEMTREC can also contact the appropriate experts.

**TYPES OF PROTECTIVE CLOTHING AND RESPIRATION THAT
SHOULD BE USED AT HAZARDOUS WASTE SITES
TONY'S EXPRESS AUTO SERVICE
3609 EAST 14TH STREET
OAKLAND, CALIFORNIA**

The degree of hazard is based on the waste material's physical, chemical, and biological properties and anticipated concentrations of the waste. The level of protective clothing and equipment worn must be sufficient to safeguard the individual. A four category system is described below.

LEVEL A

Level A consists of a pressure-demand SCBA (air supplying respirator with back mounted cylinders), fully encapsulated resistant suit, inner and outer chemical resistant gloves, chemical resistant steel safety boots (toe, shank, and metatarsal protection), and hard hat. Optional equipment might include cooling systems, abrasive resistant gloves, disposal oversuit and boot covers, communication equipment, and safety line. Level A is worn when the highest level of respiratory, skin, and eye protection is required. Most samplers will never wear Level A protection.

LEVEL B

Level B protection is utilized in areas where full respiratory protection is warranted, but a lower level of skin and eye protection is sufficient (only a small area of head and neck

is exposed). Level B consists of SCBA, splash suite (one or two piece) or disposal chemical resistant coveralls, inner and outer chemical resistant gloves, chemical resistant safety boots, and hard hat with face shield. Optional items include glove and boot covers and inner chemical resistant fabric coveralls.

LEVEL C

Level C permits the utilization of air-purifying respirators. Level B body, foot, and hand protection is normally maintained. Many organizations will permit only the use of approved full-face masks equipped with a chin or harness-mounted canister. However, many sites are visited by personnel wearing a half-mask cartridge respirator.

LEVEL D

Level D protection consists of a standard work uniform of coveralls, gloves, safety shoes or boots, hard hat, and goggles or safety glasses.

Respirators are of two basic types, air-purifying and air-supplying. Air-purifying respirators are designed to remove specific contaminants by means of filters and/or sorbents. Air-purifying respirators come in various sizes, shapes, and models and can be outfitted with a variety of filters, cartridges, and canisters. Each mask and cartridge or canister is designed for

protection against certain contaminant concentrations. Just because a cartridge says it is for use against organic vapors does not mean that it is good for all organic vapors.

Air-supplying respirators are utilized in oxygen-deficient atmospheres (less than 19.5 percent) or when an air-purifying device is not sufficient. Air is supplied to a face-mask from an uncontaminated source of air via and air line from stationary tanks, from a compressor, or from air cylinders worn on the back (SCBA). Rated capacities of the SCBA's are normally between 30 and 60 minutes. Only positive pressure (pressure demand) respirators should be used in high concentration hazardous environments.

Contact lenses are not permitted for use with any respirator. Contact lenses should not be worn at any site since they tend to concentrate organic materials around the eyes; soft plastic contact lenses can absorb chemicals directly. In addition, rapid removal of contact lenses may be difficult in an emergency. Although eye glasses can prevent a good seal around the temple when wearing goggles or full face masks, spectacle adapters are available for masks and goggles. Respirators often malfunction during cold weather or after continued use. Only NIOSH (National Institute for Occupational Safety and Health) MSHA (Mine Safety and Health Administration) approved respirators should be used.

This Site Safety Plan has been reviewed by the project engineer, STE field personnel and all subcontractors.

Amendments or modifications to this Plan may be written on a separate page and attached to this Plan. Any amendments or modifications must be reviewed and approved by the personnel name above.

This Site Safety Plan has been reviewed by the following persons:

Name: _____

Name: _____

Name: _____

Name: _____

Name: _____

Name: _____

Name: _____

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

November 2, 1992

Dear Sir:

The attached "Notice of Reimbursement" is not a bill. It is required by our contract with the State Water Resources Control Board that we send this letter to all responsible parties involved in a leaking petroleum underground tank site. You fall into the following category:

You (or your contractor/consultant) deposited funds for us to use to oversee the tank removal followed by the cleanup. Your case has been transferred to the Alameda County Local Oversight Program. This will involve your being billed after the work has been accomplished. It is directed to all responsible parties as the law requires all operators and owners to be notified.

We will continue to work with you to resolve the site remediation in progress.

If you still have any question please call this office at 271-4530 and ask for the specialist noted in the attached notice.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

ENVISION - UPDATED
3/31/01

Press [ESC] for the menu

UNDERGROUND STORAGE TANK CLEANUP SITE

-LOP:A-TRemov:--SLIC:A

SITE ID: 3337	SOURCE OF FUNDS: F	SUBSTANCE :8006619
SITE NAME: Tony's Express Auto Service		DATE REPORTED :07/01/1993
SITE ADDRESS: 3609 E 14th St		DATE CONFIRMED:07/01/1993
CITY: Oakland	ZIP CODE: 94601	MULTIPLE RPs : N

CASE TYPE: U CONTRACT STAT: 4 PRIORITY: -0- DATE ER:-0-

RP SEARCH : S		DATE END: 07/06/1993
PRELIM ASSESSMENT : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL INVEST : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL ACTION : -	DATE BEGIN: -0-	DATE END: -0-
POST REMED MONITOR: -	DATE BEGIN: -0-	DATE END: -0-

ENFORCEMENT TYPE: 1	DATE ENFORCEMENT ACTION TAKEN: 07/06/1993
LUFT CATEGORY: 2	CASE CLOSED: - DATE CASE CLOSED: -0-
DT EXC START : 07/01/1993	REMEDIAL ACTIONS TAKEN: -0-

PgDn for Screen #2

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
 Form: SITE Table: SITE Field: Source Page: 1

STID: 3337

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

IN-HOUSE MANAGEMENT:

RISK ASSESSMENT :-0-	LOC-CleanUp Fund? 02/16/2000
DATE LAST CORSP :07/29/1999	INSPECTOR INIT: BC

CONTACT/RESPONSIBLE PARTY INFORMATION:

RP #1: CONTACT: A. & I. Razi	RP COST: \$0.00
RP COMPANY NAME: Tony's Express Auto Service	Ph: -0-
ADDRESS: 3261 Ramona St.	
CITY/ST/ZIP: Pinole, C A 94564	

COMMENT: MTBE=276ppb onsite, off-site 229ppb approximately 220' ft down gradient of site, beneath the BART parking lot, MTBE migration is probably being limited due to the installation of a extra

PgUp For Screen #1;PgDn For More RP'S

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
 Form: SITE Table: SITE Field: FlagDate Page: 2