

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
05-05-06

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. RO0000265, 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](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.

Abolghassem Razi  
May 4, 2006  
Page 3

**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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent  
03-07-06

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 No. RO00265, Tony's Express Auto Services, 3609 International Blvd., Oakland, CA – Report Submittal 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](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](mailto: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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
10-7-05

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. RO0000265, 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](mailto: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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

### PERJURY STATEMENT

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**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

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

**UNDERGROUND STORAGE TANK CLEANUP FUND**

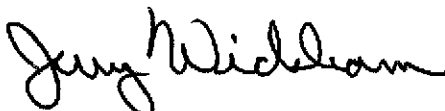
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

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

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

Sincerely,



Jerry Wickham  
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



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



June 23, 2005

Mr. Abolghassem Razi  
Tony's Express Auto Services  
3609 E. 14<sup>th</sup> 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. 14<sup>th</sup> 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



SCOT  
03-23-05

March 23, 2005

Mr. Abolghassem Razi  
Tony's Express Auto Services  
3609 E. 14<sup>th</sup> 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. 14<sup>th</sup> 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,



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

gent 7/24/00

20265

July 24, 2000  
StID # 3337

Mr. Abolghassem Razi  
Tony's Express Auto Services  
3609 E. 14<sup>th</sup> 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

**Re: Reporting Requirements for Tony's Express Auto Services, 3609 E. 14<sup>th</sup> 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Sent 1/5/00  
Including cc's

20265

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 11-18-99  
Including cc's

P0265

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

November 15, 1999  
StID # ~~3737~~ 3337

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

**Re: Vapor Extraction Test Report for 3609 E. 14<sup>th</sup> 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0265

July 29, 1999  
StID # 3337

Mr. Abolghassem Razi  
3609 International Blvd.  
Oakland CA 94601

ENVIRONMENTAL HEALTH SERVICES

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

**Re: Work Plan to Conduct VES Testing and Installation of the Remediation System at  
Tony's Express Auto Service, 3609 International Blvd., Oakland CA 94601**

Dear Mr. Razi:

Thank you for the submission of the July 20, 1999 work plan referenced above, as prepared by your consultant, SOMA Environmental Engineering, Inc. (SOMA). This work plan follows up your prior human health risk assessment, which justified the need to perform active remediation to reduce the off-site migration of petroleum contamination and the risk to off-site residents. It also responds to my July 12, 1999 letter authorizing you to proceed with the design, permitting and implementation of the proposed corrective action plan (CAP).

Our office has reviewed the work plan, which further clarifies the remediation system recommended in your feasibility study. As you may recall, groundwater contamination will be mainly treated with the construction of an extraction trench (French drain) along your southern property boundary. This will prevent migration of the existing on-site groundwater contamination and also draw a portion of the contamination plume that has migrated off-site.

To remediate the vadose soil, a combination of air sparging and vapor extraction is proposed. It is hoped that the existing monitoring and vapor wells can be used for this system. However, SOMA will conduct a vapor extraction pilot test to determine if the existing wells will be effective and be sufficient to treat the site. The variability of the subsurface soils has previously been shown, therefore, it is difficult to predict the efficiency of a vapor extraction system. It is acknowledged that after evaluation of the results of the pilot test, modifications to the proposed system may be necessary.

Please keep our office updated on the status of the proposed remediation, at a minimum, in your scheduled 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. Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203,  
San Ramon, CA 94583

Mr. M. Owens, UST Cleanup Fund, P.O. Box 944212, Sacramento, CA 94244-2120  
2CAPap3609



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0265

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. Sepchr, 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0265

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. 14<sup>th</sup> 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:

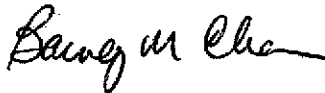
- Estimation of the residual petroleum mass at this site was done which indicates that over 2,200 pounds remains. Clearly, the source of the contamination has not been adequately removed.
- The results of the chemical transport modeling indicates the contaminant plume is expanding. This is further supported 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0265

May 11, 1999.  
StID # 3337

Mr. Abolghassem Razi  
Tony's Express Auto Services  
3609 E. 14<sup>th</sup> 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.

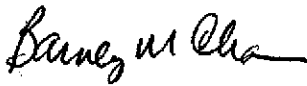
SOMA recommends the following actions:

- 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. 12<sup>th</sup> 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. 14<sup>th</sup> 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ROZBS

May 5, 1999

STID 3337

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

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

RE: Tony's Express Auto Services, 3609 International Blvd., Oakland CA 94601

**LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS**

Dear Mr. Razi:

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

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

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

**LANDOWNER NOTIFICATION**

Re: 3609 International Blvd.

May 5, 1999

Page 2 of 2

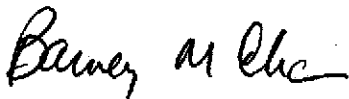
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

Please call me at (510) 567-6765 should you have any questions about the content of this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0265

May 5, 1999

STID 3337

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

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

RE: Tony's Express Auto Services, 3609 International Blvd., Oakland CA 94601

**LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS**

Dear Mr. Razi:

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

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

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



**LANDOWNER NOTIFICATION**

Re: 3609 International Blvd.

May 5, 1999

Page 2 of 2

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

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

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

Please call me at (510) 567-6765 should you have any questions about the content of this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO # 265

April 21, 1999  
StID # 3337

Mr. Abolghassem Razi  
Tony's Express Auto Services  
3609 E. 14<sup>th</sup> 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. 14<sup>th</sup> 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:

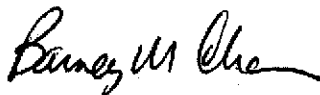
- Please have your consultant review the Tier 2 RBCA provided by Western Geo-Engineers in their December 30, 1997 report to verify the potential human health risk on and off-site. If necessary, you may have to prepare a revised RBCA.
- Please confirm the hydraulic conductivity at the site. This may be 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. 14<sup>th</sup> 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

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 265

April 2, 1999  
StID # 3337

Mr. Abolghassem Razi  
Tony's Express Auto Services  
3609 E. 14<sup>th</sup> 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. 14<sup>th</sup> 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 265

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. 14<sup>th</sup> St.  
Oakland CA 94601

Re: Quarterly Report, April-June 1998, Tony's Express Auto Service  
3609 E. 14<sup>th</sup> 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



RO# 265

May 20, 1998  
StID # 3337

Mr. Abolghassem Razi  
3609 E. 14<sup>th</sup> 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. 14<sup>th</sup> 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,

A handwritten signature in black ink, appearing to read "Barney M. Chan". The signature is fluid and cursive.

Barney M. Chan  
Hazardous Materials Specialist

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

Sve3609

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#265

March 24, 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: 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. 14<sup>th</sup> 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



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#265

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 265

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 in insure an oxidating 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.)

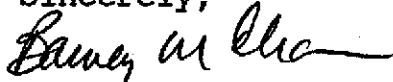
7. There are problems with the analytes and analysis recommended for the groundwater samples. Please adhere to the following lists of analytes and analytical methods:

- \* 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



RO# 265

February 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: 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 recommendd, 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.

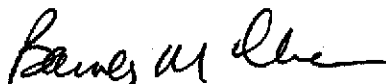
Please submit a work plan to further characterize the extent of groundwater contamination, to measure for indicator parameters for intrinsic bioremediation and to add agents to wells to enhance natural bioremediation. You should identify which wells will be monitored and which wells will have chemicals/agents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

20265

August 1, 1996  
STID # 3337

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

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

**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.

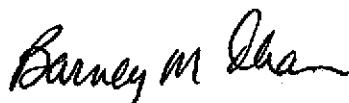
Please notify our office at least 72 working hours prior to the field work so I may arrange to be present if possible.

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. Hamedi, Soil Tech Engineering, Inc. 1761 Junction Ave.,  
Santa Jose, CA 95112  
G. Coleman, files

wpamd3609

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO#265

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, files

adssi3609

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0#265

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



R0# 265

RAFAT A. SHAHID, Assistant Agency Director

January 11, 1996  
StID # 3337

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

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

*st* G. Coleman, files

3609adssi

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0265

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,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan  
Hazardous Materials Specialist

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0265

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

wpc13609



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0265

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



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



R0265

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 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  
G. Coleman, files

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0265

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 22, 1994  
StID # 3337

Mr. Abolghassem Razi  
3261 Ramona Street  
Pinole, Ca 94564

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

**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

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

R0265

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 9, 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

**NOTICE OF VIOLATION**

**Re: Request for Technical Reports for Subsurface Investigation at  
3609 E. 14th St., Oakland CA 94601**

Dear Mr. Razi:

Recall in my August 6, 1993 letter, I requested the following items:

1. The completion of the enclosed Unauthorized Release (Leak) Form.
2. A copy of the report describing the installation and sampling of monitoring wells and the results of borings performed at the site. You were also requested to perform a vapor extraction test to determine the effectiveness of this remedial technique for this site.

You were requested to provide the technical report covering these items by October 18, 1993. To this date our office has yet to receive this information.

Please provide your monitoring well/boring report and a completed Unauthorized Release Form to our office **within 30 days or by January 11, 1994**. You should also provide a time schedule for performance of a vapor extraction test and for the installation of a vapor extraction system. You should consider this a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). Failure to provide this information 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

cc: G. Jensen, Alameda County District Attorney Office  
F. Hamedi, Soil Tech Engineering, 298 Brokaw Rd., Santa Clara, CA 95050  
E. Howell, files  
NOV3609



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0265

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.

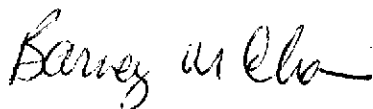
5. Because of the elevated gasoline and BTEX contamination in the groundwater samples, you should evaluate the viability of groundwater extraction as a remedial technique. To this end, you should perform a groundwater extraction test as soon as possible. This test should be scheduled **within the next 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

September 15, 1993  
StID # 3337

R0265  
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

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.

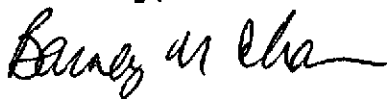
During a phone conversation with Noori Ameli of Alpha Geo Services, he said he was looking into whether his office had filled out an Unauthorized Release form. In addition, after the August 6, 1993 letter was written, our office received the August 5, 1993 proposed work plan from Soil Tech Engineering 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. Hamedi, 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

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

2010 2006  
#R0265

August 6, 1993  
StID 3337

Mr. Abolghassem Razi  
3261 Ramona Street  
Pinole, CA 94564

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

**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 you 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 be 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 requested 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



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0265

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

May 7, 1991

Mr. Jess Calleri  
Box 3130  
San Leandro, CA 94578

RE: Tony's Express Auto Service, 3609 East 14th Street, Oakland

Dear Mr. Calleri:

Per our discussion of May 6, 1991, I am enclosing a Hazardous Materials Management Plan (HMMP) form and a quarterly summary form for Mr. Razi's facility at the above address.

Please read the instructions for the HMMP before completing it. I made some comments in the instruction section and on the form to help clarify the type of information we need, and where this information can be found. I would recommend that Mr. Razi keep a copy of the HMMP onsite at his facility to show to other interested agencies (such as the Fire Department and the Air Board).

The quarterly summary report is to be sent to our office every quarter. Quarters are defined on the front page of the report. Pages 2 through 4 are taken directly from the California Code of Regulations regarding inventory reconciliation for underground tanks. Mr. Razi (or his representative) is to submit quarterly summaries, beginning with the end of the second quarter.

As I requested of Mr. Razi in my April 1, 1991 inspection, please submit copies of the last tank precision tests. You indicated in our conversation that a line leak detection system had been installed recently at Mr. Razi's business. Please provide information on the type of line leak detection and the precision test of the detection system.

These items are all required as part of the underground tank permitting process. I outlined these items in the inspection report of April 1, and to receive his operating permit, Mr. Razi must comply with those requirements. The due date for the HMMP submittal is June 1, 1991.

As I understand from our conversation, you represent Rinehart Oil Company, which is Mr. Razi's gasoline supplier. Our office would

Mr. Jess Calleri for  
Tony's Auto Express  
May 7, 1991  
Page 2

be happy to provide an overview of the state requirements and responsibilities for underground storage tanks to Rinehart Oil Company to help your clients comply with the existing rules and regulations.

If you have any questions, please call me at 415/271-4320.

Sincerely,

*Cynthia Chapman*

Cynthia Chapman  
Hazardous Materials Specialist

c: Mr. Tony Razi