



CALIF CONTRACTOR # 513857 A CORPORATION
REGISTERED GEOLOGISTS

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

September 16, 1997 (revised October 15, 1997)

Mr. Jim Munch
Pre-Approval Unit
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA. 94244-2120
(916) 227-4333

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

Dear Mr. Munch:

Western Geo-Engineers (WEGE), on behalf of Mr. Abolghassem Razi, the owner of the property listed above, is requesting pre-approval of costs to fulfill the Alameda County Health concerns addressed in the August 13, 1997 letter and subsequent meeting with Mr. Barney Chan of Alameda County on August 28, 1997.

Mr. Chan's letter dated August 13 and conclusions drawn during my meeting with Mr. Chan on August 28, 1997 indicate the following are needed prior to considering this site for closure.

The following addresses the concerns presented in the August 13, 1997 letter, these include but are not limited to, see Appendix A.

1. Sample the groundwater in selected wells for Nitrate, Sulfate, Ferrous Iron, Ortho-Phosphate, Ammonia Nitrogen, pH, Ox-Redox potential, Dissolved Oxygen, Hydrocarbon Degradors and Methane/CO₂.
2. Why was Method 8260 run on the wells and what is the source of the compounds discovered.
3. Why was MW9 decommissioned

During my meeting with Mr. Chan on August 28, 1997 the following items were verbally added to the requirements.

4. Perform Risk Base Corrective Action (RBCA) Modeling for gasoline and its constituents.
5. To evaluate this site for closure considerations and/or proceed with the clean-up, the above mentioned items need to be performed along with slug tests on all wells. This is necessary in order to calculate groundwater movement and more importantly contaminant transport beneath the site. The revised workplan will detail the methods to fulfill all concerns and field activities performed.

6. Revise the July 28, 1997 Soil Tech Engineering Workplan to address the comments in the August 13, 1997 letter and include these items listed in 4 and 5 of this section. The following table outlines the "not to exceed" costs developed for this next phase of work.

• FILE REVIEW, REGULATORY MEETINGS/CORRESPONDANCE AND EPA METHOD 8260 RESERCH	• \$2,400
• REVISION OF SOIL TECH ENGINEERING WORKPLAN, JULY 28, 1997	• \$500
• GROUNDWATER SAMPLING WITH SLUG TEST AND BIO-GEOCHEMICAL INDICATORS	• \$2,400
• LABORATORY COSTS; • 10-TPHg-BTEX, 5-AMMONIA NITROGEN, • 5-ORTHO-PHOSPHATE, 5-pH, • 5-HYDROCARBON DEGRADERS, AND • 5-METHANE/CO ₂	• \$2,300
• RISK BASE CORRECTIVE ACTION MODELING FOR FUEL RELEASE SITES (RBCA TIER II)	• \$1,300
• REPORT OF FINDINGS	• \$1,500
TOTAL NOT TO EXCEED COST	10,400.00

The above cost does not include disposal of any fluids and or soils generated during this phase of the investigation, cost for storage and disposal will be billed at cost plus as needed.

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

Thank you,



George L. Converse
Project Manager - Western Geo-Engineers

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



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September 16, 1997

Mr. Steve Marquez
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA. 94244-2120
(916) 227-4333

DRAFT

TO: G Converse
From: B Chan ALCH 510-557-
8765
Draft looks ok w/
the addition of the parameters
added below.

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

Dear Mr. Marquez:

Western Geo-Engineers (WEGE), on behalf of Mr. Abolghassem Razi, the owner of the property listed above, is requesting pre-approval of costs to fulfill the Alameda County Health concerns addressed in the August 13, 1997 letter and subsequent meeting with Mr. Barney Chan of Alameda County on August 28, 1997.

Mr. Chan's letter dated August 13 and conclusions drawn during my meeting with Mr. Chan on August 28, 1997 indicate the following are needed prior to considering this site for closure.

The following addresses the concerns presented in the August 13, 1997 letter, these include but are not limited to.

1. Sample the groundwater in the wells for nitrate, sulfate, ferrous iron and dissolved oxygen. *add Orthophosphate (PO₄-3) + ox-red. potential*
2. Why was Method 8260 run on the wells and what is the source of the compounds discovered.
3. Why was MW9 decommissioned

If Tier II RFA is done, you may want to analyze soil for fac, soil porosity + bulk density.
During my meeting with Mr. Chan on August 28, 1997 the following items were verbally added to the requirements.

4. Perform Risk Base Corrective Action (RBCA) Modeling for gasoline and its constituents.
5. To evaluate this site for closure considerations and/or proceed with the clean-up, the above mentioned items need to be performed along with slug tests on all wells. This is necessary in order to calculate groundwater movement and more importantly contaminant transport beneath the site. The revised workplan will detail the methods to fulfill all concerns and field activities performed.
6. Revise the July 28, 1997 Soil Tech Engineering Workplan to address the comments in the August 13, 1997 letter and include these items listed in 4 and 5 of this section. The following table outlines the "not to exceed" costs developed for this next phase of work.

DRAFT

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

August 13, 1997
StID # 3337

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

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

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

Dear Mr. Razi:

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

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

1. Please explain why and how monitoring well STMW-9 was decommissioned.

2. ~~MTHA 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.)~~

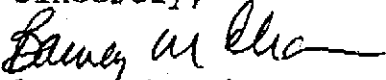
7. There are problems with the analytes and analysis recommended for the groundwater samples. Please adhere to the following lists of analytes and analytical methods:

- * 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