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FAX TRANSMITTAL

DATE: Jan. 4, 2000 FAX # 510-337-9335

TO: Barney Chan

COMPANY: _____

FROM: Mansour Sepehr

SUBJECT: 3609 International Blvd., Oakland

NUMBER OF PAGES INCLUDING COVER: 8

MESSAGE:

System Discharge Permit Summary

Reporting Requirements

The discharge permit is effective through November 15, 2000. Reports are due to East Bay Municipal Utility District (EBMUD) every six months. The first report is due June 14, 2000 for the reporting period from start-up through May 14, 2000. The second report is due December 14, 2000 for the reporting period of May 15, 2000 through November 14, 2000.

Sampling Requirements

Sampling will be required quarterly for BTEX. In addition, EBMUD will randomly sample the treatment system twice each year. Each component of BTEX has a Daily Maximum of 0.005 mg/L.

(8-16)

Note: SOMA will sample the system weekly for the first 8 weeks, bi-weekly through week 16, monthly for the next four months, and quarterly for the remainder of system operation. This schedule was developed to identify the exact operational capacity of the Granular Activated Carbon (GAC) as applied to this site. This Sampling Schedule follows the guidelines that have been required by other agencies in the past, such as Solano County Department of Environmental Health, to eliminate possible discharges during system start-up and testing.

Flow Rates

The system was designed to flow at a maximum rate of 10 gallons per minute. The system is currently running at 2 gallons per minute. The lower flow rates are in part due to the lack of rainfall this Fall/Winter. Under projected flows, the system will operate up to the maximum permitted.

Fees

| | |
|-------------------------------------|-------------------|
| Permit Fee: | \$2,490.00 |
| EBMUD Inspections and Testing Fees: | \$119.83 /month |
| Wastewater Disposal Charge: | \$123.06 /month |
| Capacity Fee over 36 months: | \$770.67 /month |
| Total Monthly Charges: | \$1,012.56 /month |

1/4/00 - Per C Hendlee, we can only request the minimum sampling requirements per EBMUD.

December 30, 1999

Request for Proposal
For Effluent Sampling, Annual Maintenance of
Groundwater Treatment System and Conducting
Four Quarters of Groundwater at Tony's Express Auto Services
3609 International Boulevard
Oakland, California

Tony's Express Auto Services in Oakland, California requesting proposals from reputable environmental firms for effluent sampling, annual maintenance of treatment system and conducting groundwater monitoring for four quarters during year 2000 at the subject property.

The consultant will provide professional and technical services to conduct the requested services presented below. The consultant shall assume responsibility for the successful completion of all items concerning the proper maintenance and reporting the requested items on a quarterly basis. In addition, the consultant shall maintain contact with the owner, submit copies of all interagency correspondence, provide progress summaries, and meet periodically with the owner or his representatives to report project status and progress. It should be noted that the commercial fueling station activities at the site must remain fully operational during normal work hours at the facility.

Background

Currently, the Site is used as a gasoline service station. The environmental investigation at the subject property started since 1992, when Mr. Razi, the property owner retained Soil Tech Engineering, Inc. (STE) of San Jose to

conduct a limited subsurface investigation. The purpose STE investigation was to determine whether or not the soil near the product lines and underground storage tanks (USTs) have been impacted by the petroleum hydrocarbons. STE drilled six soil borings to a depth of 15 feet below the ground (bgs). The results of this investigation revealed elevated levels of petroleum hydrocarbons as TPH-g (up to 460 mg/kg) and detectable levels of benzene, toluene, ethylbenzene and xylenes (BTEX) in soil samples.

In July 1993, STE removed one- single-walled 10,000-gallon gasoline tank and one single-walled 6,000-gallon gasoline tank along with a 550-gallon waste oil tank from the Site. These tanks were replaced by the similar sized double-walled USTs. Currently, there are one-10,000 gallon double-walled gasoline tank and two-6,000 gallon double-walled gasoline tanks beneath the Site. During USTs upgrade STE collected soil samples from the bottom and side-walls of excavated pits at 12 and 7 feet depth as well as underneath the piping area and analyzed for TPH-g and BTEX. The results of laboratory analysis on soil samples collected from the bottom of the excavation showed up to 460 mg/kg TPH-g. However, the samples collected below the piping showed elevated levels of TPH-g (up to 4,100 mg/kg).

Due to the presence of elevated levels of TPH-g, ACEHS requested a workplan for subsurface investigation. In August 1993, STE drilled thirteen soil borings and converted three of them into groundwater monitoring wells of MW-1, MW-2 and MW-3. To allow for future in-situ remediation of impacted soils, STE drilled four vertical 6-inch diameter soil vapor extraction probes. In addition, two horizontal perforated pipes were installed connecting four soil borings together through a manifold. The manifold was connected to a vault in front of the northeast corner of the mechanic shop building.

In August 1995, STE installed five additional groundwater monitoring wells (MW-4 through MW-8). In August 1996, STE conducted additional site

characterization activities. During this period, STE drilled five soil borings and converted three of them to groundwater monitoring wells of MW-9 through MW-11.

In December 1997, Mr. Razi retained Western Geo-Engineers (WEGE) to conduct additional investigation including a slug test and risk based corrective action (RBCA) using groundwater monitoring data. The results of slug tests conducted by WEGE indicated that hydraulic conductivity of the saturated sediment ranges between 0.4 and 10.4 feet per day. The results of hydraulic conductivity measurement conducted by WEGE contradict the lithologic logs of groundwater monitoring wells prepared by STE. As the lithologic logs of the groundwater monitoring wells indicate the saturated sediments beneath the Site is primarily comprised of fine-grained sediments of silty clay.

Reviewing the RBCA report conducted by WEGE, indicated that assumptions made by WEGE is unrealistic and does not support the actual conditions at the Site. For instance, using the shallow groundwater beneath the Site by the future Site's workers and the nearby residents as a drinking water source is unrealistic. From the other hand, the study does not consider the indoor air concentration for the current and future off-site residents as an exposure media. As a results the report offers a minimal information to the reader and results cannot be used as a decision-making tool.

Since December 1997, Mr. Razi has retained WEGE to conduct groundwater monitoring on a quarterly basis. Today after almost 6-years of monitoring and site investigation the plume of groundwater contaminants are reportedly migrating to off-site and impacting the nearby residents. Among the chemicals of potential concern is benzene and MTBE, which reportedly have migrated beyond the property's boundary.

The recent investigation by SOMA was conducted based on the approved Workplan by the Alameda County Environmental Health Services (ACEHS). The objective of SOMA's recent investigation was to install a groundwater and soil remediation system to remove petroleum chemicals from the soil and groundwater. In October 1999, a groundwater remediation system was installed, and currently SOMA is in the process of acquiring effluent discharge permit from the East Bay Municipal Utility District (EBMUD) before starting the full operation of the groundwater treatment system.

Per our Corrective Action Plan (CAP) report (SOMA, July, 1999) the air sparging in combination with pump-and-treat was found to be the most feasible, effective and cost saving alternative for remediation of on-site soils and groundwater system. In 1993, Soil Tech Engineering, Inc. (STE) installed four 6-inch diameter vapor extraction probes following the soil and groundwater investigation activities. In addition, two horizontal perforated pipes were installed at four feet depth in the fuel island area for soil remediation purposes. All the vapor wells and collector probes were piped and brought to the Christy Box in front of shop for the purpose of future hook-up and conducting a feasibility study. Figure-2 shows the location of soil vapor extraction wells and the horizontal perforated pipes.

Currently, the Site and the surrounding land are zoned for a neighborhood center mixed use and mixed housing type residential purposes. The Site is expected to remain for the neighborhood center mixed use in the future. Immediately down-gradient from the Site, the LB residential facility is located.

Scope of Work

The Scope of Work will consist of the following tasks:

Task 1 Effluent Sampling

The prospective consultant will review soil and groundwater data gathered previously and determine its adequacy for the initiation of the remediation plan. The data will be used in preparation of a detailed work plan.

Sampling the system effluent should be performed in a manner which will assist in establishing its performance. At a minimum, the system shall be sampled monthly as required by the current discharge permit by EBMUD. Initially, the system should be sampled more regularly in order to ensure the permit will not be violated and establish the adsorption characteristics of the site specific groundwater to the Granular Activated Carbon (GAC) in the columns.

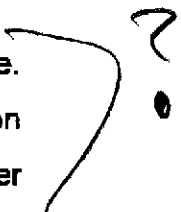
Task 2: Maintenance of Groundwater Treatment System

The Work Plan will provide a regulatory road map to conduct the investigation and remediation work if warranted. The Work Plan should specify the detailed procedure and objective and rationale for conducting investigations and remediation work.

Inspections should be performed weekly to ensure that the system is operating within the permitted limits. Permitting Fees shall be included, based on a maximum flow rate of 10 gpm. GAC Changes shall be included through the end of 2000.

Task 3: Conduct Site-wide Groundwater Monitoring

To identify the current status of groundwater contamination beneath the site. The results would help to identify if the contamination at Chevron gas station located at upgradient from the Site has contributed to the current groundwater



contamination beneath the Site. The results would also help to identify need for installing additional groundwater monitoring wells during phase II field investigation.) R

The monitoring shall be performed quarterly for all 11 wells on and off-site. A report shall follow the monitoring event, outlining the findings and noting any changes that have occurred since the previous monitoring event.

Task 4: Construction of Air Sparging System:

This task includes purchasing of equipment, construction of concrete pad, shed, trenching piping and installation of treatment system. The cost of maintenance and operation of the system for two years should also be budgeted and included.

Notes:

1. The proposal should include methodology, and a detailed cost breakdown including material, man-hours for implementing each task and the resume of proposed staff members.
2. The cost proposal should include costs associated with different permit fees such as demolition, grading, construction, NPDES and finally operation permits from different local and state agencies.
3. The existing data and site characterization reports are available upon request. For acquisition of these reports please contact Mr. Tony Razi at (510) 261-4444.
4. The deadline for submission of the written proposal is January 15, 2000. Please contact Mr. Tony Razi if you need any assistance.