SENT 6-3-05

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

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

June 2, 2005

Mr. J. Mark Inglis Chevron 6001 Bollinger Canyon Rd. San Ramon, CA 94583	Mr. Howard Perera 340 Highland Ave. Piedmont, CA 94611
Mr. Ravi Randhawa 4840 Bernal Ave., Apt. A Pleasanton, CA 94566-1133	Mr. Mir Ghafari 68 Bates Blvd. Orinda, CA 94563
Mr. Fred Machouri 1065 Shuey Dr., Moraga, CA 94556	Mr. John Robinson Hoffman Investment Co. 1035 Edwards Rd., Burlingame, CA 94010
Mr. Jeff Orwig 66 Ambleside Ct. Danville, CA 94526	

Dear Gentlemen:

Subject: Fuel Leak Case RO0000269, 340 Highland Ave., Piedmont, CA 94611

Alameda County Environmental Health staff has reviewed the April 26, 2005 *Interim Data Submittal and Requested Change in Scope of Work* submitted by Cambria. The data from the borings along the service station perimeter indicates that petroleum impact to soil is absent and groundwater is not encountered to the east of the site, therefore, the initial work plan is proposed to be changed to advance the outlying borings only in the most likely areas of groundwater impact. This area will be investigated until the adjacent borings do not exhibit any petroleum contamination. This is a reasonable approach to focus the investigation, therefore, the change in scope is approved. All other elements of the original work plan shall remain the same.

TECHNICAL REPORT REQUEST
You are reminded to submit your Soil and Groundwater Investigation report, including a revised Site Conceptual Model (SCM), to our office within 90 days of completing your investigation.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

C: files, D. Drogos
Dave Charter, SWRCB UST Fund
John Speakman, Chief, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94611
Geoffrey Grote, City Administrator, 120 Vista Ave., Piedmont, CA 94611
Kate Black, Piedmont Planning Dept., 120 Vista Ave., Piedmont, CA 94611
George S. Peyton, Jr., Lombardi, Loper & Conant, LLP, Lake Merritt Plaza
1999 Harrison St., Ste. 2600, Oakland, CA 94612-3541
Kimberly Johnson, Esq., Meyers, Nave, Riback, Silver & Wilson, 555 12th St.,
Ste. 1500, Oakland, CA 94607
Laura Genin, Cambria, 5900 Hollis St., Suite A, Emeryville, CA 94608

340HighlandAve 6_1_05

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

SENT 9-21-04

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

September 21, 2004

Mr. George Peyton, Jr.
Lombardi, Loper & Conant, LLP
Lake Merritt Plaza
1999 Harrison St., Suite 2600
Oakland, CA 94612-2699

Dear Mr. Peyton:

Subject: Fuel Leak Case RO0000269, 340 Highland Ave., Piedmont, CA 94611

This letter responds to your inquiry regarding the number and locations of proposed borings for the proposed soil and groundwater investigation of the referenced site. Our office confirms that the 44 boring locations proposed in the Cambria February 1, 2004 Investigation Workplan have been approved by our office and are deemed necessary to determine the extent and amount of contamination migrating from the referenced site.

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

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos
Ms. Karen Streich, ChevronTexaco, 6001 Bollinger Canyon Rd., K2256, P.O. Box 6012, San Ramon, CA 94583-2324
Mr. N. Scott MacLeod, Cambria Environmental, 5900 Hollis St., Suite A, Emeryville, CA 94608

340Highland 9_20_04

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

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

May 17, 2004

Howard Perera
340 Highland Avenue
Piedmont, CA 94611

Ravi Randhawa
317 Lone Oak Drive
Pleasanton, CA 94566

Karen Streich
ChevronTexaco
P.O. Box 6012
San Ramon, CA 94583

Frank Hoffman
Hoffman Investment Company
1760 Willow Road
Hillsborough, CA 94010

Jeff Orwig
66 Ambleside Court
Danville, CA 94526

Fred Manchouri
1065 Shuey Drive
Moraga, CA 94556

Mir Ghafari
68 bates Boulevard
Orinda, CA 94563

RE: Fuel Leak Case No. RO 269, Piedmont Chevron #9-0329 dba Texaco Station, 340 Highland Avenue, Piedmont

Dear Ms. Streich and Messrs. Perera, Randhawa, Hoffman, Orwig, Manchouri, and Ghafari:

This letter follows staff review of the Cambria Environmental Technology, Inc. (Cambria) *"Investigation Workplan"* dated February 1, 2004. This work plan proposes a scope of work intended to identify potential impacts to shallow groundwater through installation of 44 soil borings along two sweeping transects in the expected down gradient direction(s) from the subject site.

The referenced Cambria work plan has been accepted with the following clarifications:

1. Cambria proposes to advance borings by hand, as they anticipate total depths to be within 8' below grade (BG). Cambria safety rules dictate all boring between ground surface and 8' BG are to be advanced in this fashion. However, all borings shall be advanced until encountering competent bedrock, no matter the depth. This may require, once having reached a depth of 8' BG by hand, that the boring(s) be continued beyond that depth using an acceptable "push tool" rig (e.g., GeoProbe, etc.) to ensure appropriate water/soil sampling depths have been achieved and refusal, as a clear consequence of encountering competent bedrock, is determined.

2. Depth discrete water and soil sampling is requested. Water sampling intervals shall extend no more than 2' of depth per interval. Should temporary well screens be used to facilitate water sampling (as opposed to use of a Hydropunch-type sampler), screen lengths shall likewise be no greater than 2'. Borings shall be advanced to each subsequent sampling depth, and a water/soil sample collected, until reaching competent bedrock. There may be those individual borings where only one water/soil sampling depth may be realized

due to encountering shallow bedrock prior to reaching the next sampling interval. In those cases a single water/soil sampling interval is acceptable.

3. Water and soil analyses shall include total oxygenates (as noted in Cambria's work plan), including Ethanol.

4. The appropriate number of soil samples submitted for laboratory analyses shall be based on observations made in the field at the time borings are completed. The number of soil samples collected prior to reaching competent bedrock in any one boring should be a consideration. The number of soil samples submitted for laboratory analyses is fully anticipated to be greater than the approximate number of samples proposed in the Cambria work plan.

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

90 Days from SWI Work Plan Approval – Soil and Water Investigation Report (which contains the results of the pending SWI assessment work, and a proposal for the installation of new monitoring wells and/or additional investigation, as appropriate). The SWI report shall also include a revised Site Conceptual Model (SCM).

90 Days after Submittal of Soil and Water Investigation Report - Corrective Action Plan

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to $10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,

Scott O. Seery, R.G., CHMM
Hazardous Materials Specialist

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
John Speakman, Chief, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94611
Kate Black, Piedmont Planning Dept., 120 Vista Ave., Piedmont, CA 94611
George S. Peyton, Jr., Lombardi, Loper & Conant, LLP, Lake Merritt Plaza
1999 Harrison St., Ste. 2600, Oakland, CA 94612-3541
Kimberly Johnson, Esq., Meyers, Nave, Riback, Silver & Wilson
555 12th St., Ste.1500, Oakland, CA 94607
Bruce Eppler, Cambria Env. Technology, Inc. 4111 Citrus Ave., Ste. 9, Rocklin, CA 95677
D. Drogos, R. Weston

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

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

September 18, 2003

Howard Perera
340 Highland Avenue
Piedmont, CA 94611

Ravi Randhawa
4554 Deerfield Drive
Antioch, CA 94531-7100

Karen Streich
ChevronTexaco
P.O. Box 6012
San Ramon, CA 94583

Frank Hoffman
Hoffman Investment Company
1760 Willow Road
Hillsborough, CA 94010

Jeff Orwig
66 Ambleside Court
Danville, CA 94526

Fred Manchouri
1065 Shuey Drive
Moraga, CA 94556

Mir Ghafari
68 bates Boulevard
Orinda, CA 94563

Dear Ms. Streich and Messrs. Perera, Randhawa, Hoffman, Orwig, Manchouri, and Ghafari:

RE: Fuel Leak Case No. RO269, Piedmont Chevron #9-0329 dba Texaco Station, 340 Highland Avenue, Piedmont

This letter follows staff review of the historic fuel leak case file for the above referenced site, up to and including the June 17, 2003 Gettler-Ryan Inc. 2nd quarter 2003 sampling and monitoring report. This office is concerned with the continued presence of elevated concentrations of gasoline compounds in groundwater sampled from on-site well C-2, as well as in water sampled from temporary sampling point U-1. We are primarily concerned with the elevated concentrations of the fuel oxygenate Methyl tert-Butyl Ether (MtBE). We are concerned that the extent of the contaminant plume is still largely unknown. We are also concerned that the mechanisms controlling the migration of fuel releases away from the site, including the apparent presence of geogenic preferential flow pathways, are not well understood or evaluated.

This letter presents a request to complete a Soil and Water Investigation (SWI), Site Conceptual Model (SCM), and Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required SCM, SWI, and CAP. **We request that you prepare and submit a work plan for the SWI that addresses the following comments.**

TECHNICAL COMMENTS

1. Preferential Pathway Study

An initial conduit / preferential pathway study was attempted in March 2000 to evaluate whether utility trenches contribute to groundwater plume migration from the source area. Several borings were to have been advanced into specific utility trenches in accordance with an approved scope of work. However, the project was not completed according to the approved scope. Borings were advanced by hand into native materials adjacent to the targeted utilities (rather than within the utility trenches themselves) with limited success due to bedrock being encountered at shallow depths in nearly all sample locations. Groundwater samples could only be collected from two of five borings (U-1, U-4), and all were from apparent formation materials. Therefore, this study did not accomplish its intended goal. However, this work did identify high concentrations of MtBE (39,000 ug/l) in groundwater collected from a high permeability sand unit encountered in boring U-1, located near the southern corner of the property, adjacent to a sanitary sewer line skirting the southwestern property boundary. Bedrock was not encountered in this boring to the depth explored of approximately 5' below grade (bg).

In March 2001, the conduit / preferential pathway study was repeated by a different consultant, following the same approved scope of work. Three of five attempted borings were successfully advanced by hand into the targeted utility trenches in locations adjacent to those advanced previously. Two other borings, U-7 and U-9, met with refusal at a depth of 3.5' bg. Although U-7 and U-9 were attempted in locations within 6" of the marked surface trace of the targeted utilities, each appeared to be advanced into native materials, not into trench backfill. Groundwater was not encountered in any of the borings, whether completed in utility trenches or formation materials. These data suggest that groundwater is not exploiting utility trenches in those specific areas where borings were successfully completed.

Using the results of the conduit / preferential pathway studies and other data discussed, below, you are to develop the initial three-dimensional *Site Conceptual Model* (SCM) of site conditions. You are to use this initial SCM to determine the appropriate configuration for sampling points in the pending SWI phase of work at this site. Discuss your analysis and interpretation of the results of the conduit studies and explain your rationale for the configuration of sampling points in the SWI work plan.

2. Site Conceptual Model

Starting with a critical review of the conduit / preferential pathway studies, data from previous investigations and tank operational records for this site, as well as those derived from logs of supply wells within ¼ mile of the site, followed by an evaluation of regional and area-specific geology and hydrogeology based on published U.S. Geological Survey and California Geological Survey reports, as well as other reports published for public works or other projects in the general vicinity of the site, you are to develop the initial three-dimensional SCM of site conditions. You should include in the SCM a series of cross-sections drawn along transects both normal and parallel to the anticipated groundwater flow direction to illustrate your interpretation of underlying geology, the locations of utility corridors and trenches, and other salient features.

An SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors, among other possible topics to be considered. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

Your attention is directed to *"Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE"*, American Petroleum Institute Publication No. 4699 dated February 2000 as a resource for development of the SCM. Your attention is also directed to the State Water Resources Control Board (SWRCB) *"Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft"*, dated March 27, 2000, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled *"Mass Flux Estimates to Assist Decision-Making"* to help in development and strategies for refinement of the SCM, among other related tasks. I can provide copies of any of these documents if you need them.

You are requested to use this initial SCM and referenced guidance documents to help you determine the appropriate configuration for samplings points in the pending SWI phase of work at this site. Please discuss in the SWI work plan your analysis and interpretation of the results of the conduit study and SCM, and explain your rationale for the configuration of proposed sampling points.

3. Contaminant Plume Definition

The purpose of contaminant plume definition is to determine the *three-dimensional* extent of contamination in soil and groundwater, including a determination of 3-D extent of impacts in the source area(s) and released contaminant mass, and a demarcation of potential geogenic and anthropogenic flow pathways. As you know, up to 39,000 ppb MtBE was detected in a water sample collected from boring U-1 in March 2000. Boring U-1 represents the most down-gradient sample location on the station property. On-site well C-2, the most down-gradient on-site monitoring well, continues to reveal elevated MtBE concentrations dating as far back as January 1996, the first time MtBE was sought during routine groundwater sampling. Samples collected as recently as May 2003 show concentrations of MtBE at 6000 ug/l, Total Petroleum Hydrocarbons as Gasoline (TPH-G) at 2500 ug/l, and Benzene at ug/l ppb, among other fuel compounds detected in well C-2.

Although this issue has not yet been fully investigated to date, there is evidence that groundwater encountered in some number of wells associated with this site investigation are under confined conditions. In some locations, specifically C-6 and MW-6, artesian conditions have been noted. Most significantly, soon after well MW-6 was installed in May 1994, groundwater rose to approximately 6' above grade into a standpipe installed temporarily onto the existing well casing. Well MW-6 was promptly destroyed.

Boring logs for this well reveal that shallow bedrock was not encountered during boring advancement. Native materials were reportedly comprised of silt from approximately 2 – 3.5' bg, followed by a dense silty sand to a total depth of 20' bg. The boring was finally terminated at 21' bg upon encountering

(apparent) bedrock. The log for boring B-4, emplaced preliminary to and within 10' of well MW-6, also reports sands to total depth explored (5' bg).

Well MW-6 is located immediately adjacent to a city park. The topography at the park, adjacent to well MW-6, slopes downhill to the south/southeast towards a southwesterly flowing stream that bisects the center of the park. Highland Avenue represents a topographic high that surrounds the park's upper perimeter. Park landscapers have reported that the grass-covered side slope adjacent to MW-6 is typically saturated. This information, along with evidence for artesian conditions at MW-6, suggests that groundwater is day lighting as a spring at that location.

The boring log for on-site well C-2, installed in January 1983, reflects a reported 12' of sand before reaching bedrock at a depth of 17' bg. The log for wells C-1 reports encountering weathered bedrock at 5.5' bg, and (competent) bedrock at 17' bg. Logs for wells C-3 and –4 report weathered bedrock at 9 and 11' bg, and (competent) bedrock at 17 and 13', respectively. Logs for wells C-5 and -6 identify weathered bedrock at depths of 5' bg in each location. In contrast, logs for borings U-2 and –3 report weathered bedrock at depths between 2.5 and 3' bg.

These data suggest that there may be a bedrock cleft or hollow filled with high-permeability sediments, and that this may present a preferential geogenic groundwater and contaminant flow pathway at this location. This theory requires further investigation in the pending SWI.

Further assessment is necessary to better understand site geology and hydrogeology, determine the mode of contaminant transport from the site, and to refine the SCM. We therefore request a three-dimensional investigation. As groundwater appears to flow, based on the investigations completed to date, along the unconsolidated sediment/bedrock interface, verification and mapping of this interface appears critical in understanding the hydrogeology at this location. In addition, the vertical and horizontal distribution of impacts is to be determined. Transects of sampling points across and along the (anticipated) plume axis are anticipated. The SWI work plan, the scope of which should be substantially based on the completed SCM, shall present your plan to accomplish these tasks.

Conventional investigation techniques and monitoring well networks currently used at fuel leak sites are generally insufficient to adequately characterize modern fuel impacts, including those caused by MtBE and other oxygenates. It is recommended that your investigation initially incorporate expedited site assessment techniques and borings. The borings are to be continuously cored and logged, with close attention paid to changes in lithologies that might facilitate solute transport (e.g., silty/sandy stringers in otherwise fine grained sediments).

In general, soil samples should be collected for laboratory analysis at 5-foot intervals, areas of obvious contamination, the soil/groundwater interface, and at each lithologic change noted during boring advancement, at a minimum. Water samples are to be collected at discrete depths to total depth explored. Detailed cross-sections, fence diagrams, structural contours and isopachs, and rose diagrams for groundwater flow (incorporating all groundwater data), should be subsequently incorporated into the SWI report. Cross-sections should be scaled to clearly illustrate subsurface lithologies, including the locations of stringers and other zones of relatively higher permeability, particularly in those areas where such zones may be intercepted by buried utilities.

Final well locations and screen depths, should they be required, will be substantially based on the results of the SWI and refined SCM. The monitoring of multiple discrete water-bearing zones with short-screened intervals should be anticipated in most cases, and is fully dependent upon what is found during the SWI. Generally, these screened intervals should not be greater than 3' in length. We will expect that the SWI Report will propose the locations of such wells, if prudent, the anticipated well screen depths, their configurations (e.g., single well, well cluster or multi-level, as appropriate), and the reasoning behind the location and configuration of each.

Discuss your proposal for performing this work outlined, above, in the SWI work plan. The results of the conduit studies and the initial SCM are to be discussed in the SWI work plan to justify your proposed scope of work.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. Technical protocol for expedited site assessments are provide in the US EPA *"Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators"* (EPA 510-B-97-001), dated March 1997.

4. Corrective Action Plan

The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective **final cleanup objectives and remedial alternatives for both soil and groundwater impacts, including those caused by MtBE and other fuel oxygenates,** that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A final CAP for the soil and groundwater impacts caused by an unauthorized release(s) at the site will be requested upon completion of the SWI and final SCM in accordance with the schedule specified below. The CAP shall address at least two technically and economically feasible methods to restore and protect beneficial uses of water and to meet the cleanup objectives for each contaminant established in the CAP. The CAP should incorporate both on-site and distal plume corrective action elements. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

October 20, 2003 – Work plan for Soil and Water Investigation

October 20, 2003 - Site Conceptual Model

60 Days from SWI Work Plan Approval – Soil and Water Investigation Report (which contains the results of the initial SWI assessment work, and a proposal for the installation of new monitoring wells and/or additional investigation, as appropriate)

90 Days from Completion of Soil and Water Investigation – Soil and Water Investigation Completion Report (which incorporates all data generated during completion of the SWI, both initial and subsequent phases, including the installation of the new monitoring wells)

90 Days after Submittal of Soil and Water Investigation Completion Report - Corrective Action Plan

January 15, 2004 – Quarterly Report for the Fourth Quarter 2003

April 15, 2004 – Quarterly Report for the First Quarter 2004

July 15, 2004 – Quarterly Report for the Second Quarter 2004

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to $10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,

Scott O. Seery, R.G., CHMM
Hazardous Materials Specialist

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
John Speakman, Chief, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94611
Kate Black, Piedmont Planning Dept., 120 Vista Ave., Piedmont, CA 94611
Kimberly Johnson, Esq., Meyers, Nave, Riback, Silver & Wilson
555 12th St., Ste.1500, Oakland, CA 94607
D. Drogos, R. Weston

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

10-23-02

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

October 22, 2002

RO 269

Ms. Karen Streich
Chevron Products Company
P.O. Box 6004
San Ramon, CA 94583

RE: Chevron Station # 9-0329, 340 Highland Avenue, Piedmont - Request for Total Fuel Oxygenate Analyses

Dear Ms. Streich:

The case file for the referenced site was recently reviewed, up to and including the July 2002 Gettler-Ryan Inc second quarter 2002 monitoring report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

In addition, you are reminded that all reports for this case, *as well as all other ChevronTexaco cases,* are to be submitted under ChevronTexaco cover that is signed, under penalty of perjury, by the official ChevronTexaco project representative.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH
John Speakman, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94611
Deanna Harding, Gettler-Ryan Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568
James Brownell, Delta Environmental Consultants, Inc.
3164 Gold Camp Drive, Ste. 200, Rancho Cordova, CA 95670

Sent 9-15-2000

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

R0269

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

September 14, 2000

STID 1143

Mr. Tom Bauhs
Chevron Products Company
P.O. Box 5004
San Ramon, CA 94583

RE: 340 Highland Avenue, Piedmont – Preferential Pathway Investigation

Dear Mr. Bauhs:

This letter follows my attempts to contact you by telephone over the last week. As I mentioned in my messages to you, we are in receipt of the August 7, 2000 *Subsurface Investigation Report* submitted by Cambria Environmental Technology, Inc. (Cambria). This report documents work performed by Cambria in March 2000, the scope of which was to adhere to the specific tasks and objectives outlined in the *revised* Pacific Environmental Group, Inc. (PEG) workplan dated November 30, 1998, as submitted under Chevron cover dated December 11, 1998.

The revised PEG workplan, replacing an earlier PEG workplan dated September 9, 1998, was produced as a direct consequence of an October 1998 meeting between Chevron, PEG, and this agency during which the final scope of work was fine-tuned. As you may be aware, our attention was focused specifically on the shallow sanitary and storm sewer trenches located adjacent to the site, as they were long suspected as potential preferential pathways for the migration and dispersal of MtBE-impacted groundwater away from the site.

In order to determine if the sewer trenches did act as preferential pathways, the sole goal of the subject investigation was to advance sampling probes *into the sewer trenches* and collect groundwater samples if encountered there. In order to eliminate risks to the investigated utilities and field personnel both, each probe would be advanced by hand, a reasonable approach considering the very shallow depths the sample probes were expected to be pushed.

In practice, unfortunately, this workplan was not adhered to. Sample probes were not advanced into the sewer trenches as required, but, rather, beside them. Shallow bedrock and refusal were encountered in 3 of 5 sample locations at reported depths of between 2.5 and 3.0' below grade. Only two water samples were collected and neither came from the sewer trenches. Consequently, the issue of preferential migration via sewer trenches has still not been resolved, now nearly 2 years after workplan approval.

At this time, the responsible parties are directed to fully implement the scope of the cited PEG workplan within 60 days of the date of this letter.

Please call me at (510) 567-6783 should you have any questions or care to discuss this issue in more detail.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mike O'Connor, Alameda County District Attorney's Office
Chuck Headlee, RWQCB
Robert Weston, ACDEH
Jeff Orwig and Mir Ghafari, Piedmont Texaco, 340 Highland Ave.
Piedmont, CA 94611
Frank Hoffman, Hoffman Investment Co., 1760 Willow Rd.
Hillsborough, CA 94010
Fred Manchouri, 1065 Shuey Dr., Moraga, CA 94556
Jim Perkins, Cambria Env. Technology, Inc., 2694 Bishop Dr., Ste. 105
San Ramon, CA 94583

Sent 11-10-99
Including cc's

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

P0269

November 10, 1999

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

STID 1143

Mr. Brett Hunter
Chevron Products Company
P.O. Box 5004
San Ramon, CA 94583

RE: 340 Highland Avenue, Piedmont – Utility Conduit Investigation

Dear Mr. Hunter:

In correspondence dated December 16, 1998, the amended Pacific Environmental Group, Inc. (PEG) utility conduit investigation work plan was accepted by this office. In correspondence from Chevron dated March 8, 1999, I was advised that encroachment from the City of Piedmont "...[was] expected shortly, with fieldwork to start within 2-3 weeks." I was advised on June 14, 1999 that Chevron was simply waiting for the signature of Mr. Hoffman (Hoffman Investment Co., the owner of the subject property) on the City's encroachment permit application.

Following my inquiry into the status of this (still) pending work on September 21, 1999, you advised me that you would look into the matter and get back to me with the details. You had only just recently taken over responsibility for this project from your predecessor, Phil Briggs. To date, I have heard nothing more about the status of this pending work.

As you are aware, the sampling data generated to date appear to demonstrate that shallow groundwater impacted by high concentrations of MtBE (45,600 ug/l in 7/99) has been intercepted and redirected by sewer line trenches that pass directly in front of the site. This is a serious issue that still requires prompt attention.

Chevron is directed to advise this office within 10 days, in writing, as to the status of this pending work, the schedule for implementation of the approved work plan, and the cause(s) for these unreasonable delays.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Ariu Levi, Chief, Environmental Health
Chuck Headlee, RWQCB
Robert Weston, ACDEH
Frank Hoffman, Hoffman Investment Co.
1760 Willow Rd., Hillsborough, CA 94010

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

R0269

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

May 4, 1999

STID 1143

Mr. Phil Briggs
Chevron Products Company
P.O. Box 6004
San Ramon, CA 94583-0804

RE: (Former) Chevron Service Station, 340 Highland Avenue, Piedmont

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Briggs:

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.

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) 567-6783 should you have any questions about the content of this letter.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

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

Po 269

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

December 16, 1998

STID 1143

Mr. Philip Briggs
Chevron Products Company
P.O. Box 5004
San Ramon, CA 94583

RE: 340 Highland Avenue, Piedmont – Utility Conduit Investigation

Dear Mr. Briggs:

I have reviewed the November 30, 1998 Pacific Environmental Group, Inc. (PEG) *Addendum Work Plan for Groundwater Investigation* for the utility conduit investigation planned for the next phase of the assessment of the release at the subject site. The *revised* plan, submitted under Chevron cover dated December 11, 1998, amends the original PEG work plan dated September 9, 1998.

The *revised* PEG work plan has been accepted with the following change:

- Groundwater samples are to be collected from the completed boreholes using a device that will minimize the potential for the agitation of formation water and loss of volatile constituents in collected samples. For example, a "mini" bailer is such a device, while a peristaltic pump is not.

Please call me at (510) 567-6783 when fieldwork has been scheduled.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Robert Weston, ACDEH
Frank Hoffman, Hoffman Investment Co.
1760 Willow Rd., Hillsborough, CA 94010
Messrs. Manoucheri and Ghafari, 340 Highland Ave., Piedmont, CA 94611
James Perkins, Pacific Environmental Group, Inc.
2025 Gateway Pl., Ste. 440, San Jose, CA 95110-1006

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

RO# 269

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

August 10, 1998

STID 1143

Mr. Philip Briggs
Chevron Products Company
P.O. Box 5004
San Ramon, CA 94583

Mr. Frank Hoffman
Hoffman Investment Company
1760 Willow Road
Hillsborough, CA 94010

Messrs. Manoucheri and Mir Ghafari
340 Highland Avenue
Piedmont, CA 94611

RE: 340 Highland Avenue, Piedmont – Preferential Pathway Investigation

Dear Messrs. Briggs, Hoffman, Manoucheri and Ghafari:

In correspondence dated March 18, 1998 addressed to Mr. Briggs (Chevron), this office requested, among issues discussed, that a determination be made whether utility alignments, such as storm drain trenches along Highland Avenue and Highland Way, may present preferential flow pathways for dispersal of contaminants away from the subject site. This request was based on: 1) the presence of elevated concentrations of MtBE (up to 210,000 ug/l) in groundwater sampled from on-site well C-2; 2) the absence of MtBE in water sampled from nearby off-site well C-6; and, 3) the occurrence of groundwater at such shallow depths recently (< 2' below grade) that it was (and is) anticipated that utility trenches were (are) likely submerged. In such instances, utility trenches may act as conduits for the rapid transmission of both groundwater and contaminants away from sites such as this one.

A work plan for the evaluation of this issue was requested by April 30, 1998.

Mr. Briggs responded in correspondence dated April 6, 1998 that, "Chevron believes that (they) are not responsible to do this evaluation." The basis for Chevron's position is the claim that they have had no control over the site and station operation since 1990, and that the MtBE detected in groundwater samples collected from the monitoring well network may represent a "recent" leak or spill. Hence, no work plan for evaluating utility conduits has been submitted to date.

Pursuant to Section 2720 of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR), all parties identified as "responsible parties" are jointly and severally responsible for all elements of the investigation and clean-up of releases from regulated underground storage tanks (UST). It is up to the responsible parties to determine apportionment of costs and sharing of tasks should they care to do so. However, in context with the cited provisions, all parties are independently responsible for ensuring compliance with UST law and regulations.

At this time, you are collectively requested to submit a work plan for evaluating the role utility alignments may play in contributing to contaminant dispersal from the site. This work plan is due within 30 calendar days of the date of this letter.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health
Larry Blazer, Alameda County District Attorney's Office
Chuck Headlee, RWQCB
Robert Weston, ACDEH

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

RO269

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

12 June, 1998

STID 1143

Philip Briggs
Chevron USA Inc.
P.O. Box 5504
San Ramon, CA 94583-0804

re: 340 Highland Ave., Piedmont, CA 94611

Dear Philip Briggs:

This office has received and reviewed Quarterly Groundwater Monitoring Reports, dated March 3, 1998 and March 26, 1998 by Blaine Tech Services, Inc., with your cover letters dated April 6, 1998, and May 27, 1998, for the above site. The following are comments concerning these reports.

Your modified monitoring schedule is acknowledged. The flooding of the downgradient well is unfortunate, but that well has historically not been contaminated. The next quarter should show if there is any migration of MTBE.

This office is pursuing action with the current owner and operator of the station regarding what may be a new leak from the current underground storage tanks. The contact for this action is Rob Weston at 567-6781.

Please call this office with any questions at (510) 567-6782.

Sincerely,

Thomas F. Peacock, Manager
Environmental Protection Division

c: Francis Thie, Blaine Tech Services, Inc., 1680 Rogers Ave., San Jose, CA 95112
Dick Pantages, Chief - **files**

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

RO#269

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

March 18, 1998

Philip Briggs
Chevron Products Company
P.O. Box 5004
San Ramon CA 94583

RE: Groundwater Monitoring, Service Station at 340 Highland Av., Piedmont CA 94611 (Our Site #1143)

Dear Mr. Briggs:

Recently I assumed case responsibility from Susan Hugo of this Office. Ms. Hugo and I have reviewed your proposal of March 7, 1998 to alter groundwater monitoring frequency for the site. You requested that wells C-3 and C-5 be monitored annually and that C-4 and C-6 be monitored semi-annually during the first and third quarters. You propose to continue monitoring C-2 quarterly. Chevron may implement the proposed schedule with the following stipulations:

1. Continue to sample well C-3 on a quarterly schedule for at least the next quarter. Because MTBE was found in this well in January, it is important to re-sample soon to verify the presence of MTBE.
2. Down gradient well C-6 also should remain on a quarterly monitoring schedule to confirm that contamination is not migrating off-site.
3. Determine whether utilities such as storm drains along Highland Av. and Highland Way may be acting as preferential pathways for contaminant movement in the subsurface. MTBE has been detected in well C-2 (up to 210,000 ppb),yet down gradient well C-6 (situated approximately 100 feet south of well C-2) has not detected MTBE. I have received a complaint of petroleum odors coming from a storm drain opening on Highland Way east of the station. Soil and groundwater samples should be collected along this or other identified preferential pathways
4. Perform a well and surface water survey for the area within one quarter mile of the site.

Please submit a work plan to evaluate to evaluate the presence and effect of conduits on the distribution of soil and groundwater contaminants along Highland Av. and Highland Way by April 30, 1998.

The tank and property owners have been instructed by this Office to investigate possible sources of MTBE from ongoing operation of the tanks. I am expecting a work plan from them by the end of March, 1998. This work plan must address investigation of possible contamination sources such as dispenser leaks and overspills along with the required 1998 upgrades.

Sincerely,

Pamela J. Evans

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Chuck Headlee, SF Bay RWQCB
Frank Hoffman, Hoffman Investment Company, 1760 Willow Rd., Hillsborough CA 94010
Fred Manoucheri and Mir Ghafari, Piedmont Enterprises, 340 Highland Av.,Piedmont CA 94611

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

RO # 269

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

Certified Mail # Z 773 036 504

December 29, 1997

Mir Ghafari & Fred Manoucheri
Piedmont Enterprises
340 Highland Av.
Piedmont CA 94611

RE: Underground Storage Tank (UST) Upgrade and Certification Requirements for Service Station at 340 Highland Av., Piedmont CA 94611 (Our Site #1143)

Gentlemen:

USTs must meet certain upgrade requirements by December 22, 1998. In addition, **legislation was recently signed into law which prohibits fuel deliveries to your tanks after January 1, 1999** unless your system is in compliance **and** you are displaying a certificate issued by this Office. **Fuel delivery drivers will be prohibited by law from delivering fuel to tank sites that are not certified.** I have recently completed a review of your file to determine what is needed to certify your USTs. In order to meet the December 1998 deadline and to avoid any interruption in your fuel deliveries starting January, 1999, you will need to take the following actions.

- **Investigate the source of MTBE in groundwater at the site:** This issue has been addressed in other correspondence.
- **Update Financial Certification for the tanks:** Blank forms are enclosed, along with copies of your previous forms.

*The above items need to be addressed as soon as possible as they are **current** requirements. The next four items relate to upgrade requirements in effect as of December 22, 1998.*

- **Retrofit the single-walled waste oil tank with double containment or properly close it.**
- **Install an overfill prevention system and a spill container for each tank:** A description of the overfill/overspill requirements is enclosed.
- **Ensure that tanks are equipped with protective devices beneath accessible openings:** Devices such as striker plates or attachable bottom protectors will be required. Our files do not show that your tanks are now equipped with such protective devices. You either will have to establish that bottom protective devices currently exist in your tanks, or will have to install such devices. I have enclosed information about bottom protectors.

- **Install dispenser containment:** Dispenser containment is required if your piping will be replaced or otherwise upgraded.
- **Complete the enclosed A and B permit application forms.** Please fill out these updated forms as completely and as accurately as possible. Complete **one A form per site** and **one B form per tank.** The forms need to describe the upgrades you propose for your tank system.
- **Update your written monitoring and emergency response plans:** The plans need to describe new equipment and procedures associated with the tank upgrades.

You must submit plans and permit applications for your tank system upgrades to this Office for review and acceptance in a timely manner so that the work can be completed by December 22, 1998. Please keep in mind that hundreds, and possibly thousands, of tank systems through out the Bay Area must come into compliance by December 22, 1998. There will be high demand for reputable tank contractors and tank upgrade equipment as these important dates approach. Thus I encourage you to **initiate** the last six steps outlined above within the next 30 days.

Once your upgrade plans have been accepted and work begins, I will make a series of inspection of your tank system. These inspections are necessary for issuing the certificate. You may contact me at (510)567-6770 with any questions about this letter or the inspection.

Sincerely,

Pamela J. Evans

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Frank Hoffman, Hoffman Investment Company, 1760 Willow Rd., Hillsborough CA 94010
Richard L. Jones, Piedmont Fire Department

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

RO#269

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

Certified Mail # Z 199 067 036

October 22, 1997

Philip Briggs
Chevron Products Company
P.O. Box 5004
San Ramon CA 94583

Mir Ghafari & Fred Manoucheri
Piedmont Enterprises
340 Highland Av.
Piedmont CA 94611

Certified Mailer# Z 199 067 037

Frank Hoffman
Hoffman Investment Company
1760 Willow Rd.
Hillsborough CA 94010

Certified Mailer# Z 199 067 038

RE: Service Station at 340 Highland Av., Piedmont CA 94611 (Our Site #1143)

NOTICE OF VIOLATION

Gentlemen:

This agency has reviewed reports of tank and line tightness tests for the past past year. Although statistical inventory reconciliation data for some months in late 1996 were incomplete, these reports do not indicate a leak in the tank systems. Nonetheless, groundwater monitoring data have shown that concentrations of methyl tertiary butyl ether (MTBE) have increased in the monitoring well located down-gradient from the tanks. This letter serves to notify Chevron (the former tank owner/operator), Mr. Ghafari & Mr. Manoucheri (the current tank operators) and Mr. Hoffman (the current property owner) that further investigation is required to determine the source of the increasing MTBE in groundwater.

The tanks are not known to be outfitted with overfill prevention systems. A likely cause of this contamination is past and/or ongoing overfilling of the tanks or leaks at the dispensers. Please submit a work plan to investigate and correct releases of petroleum hydrocarbon contamination

at the site. At a minimum, your workplan should include steps you will take to investigate and correct contamination from overfilling, vent line leaks, dispenser leaks or other causes. You must submit your workplan to this Office **no later than November 5, 1997**. It is necessary to coordinate this investigation among the responsible parties so that any ongoing releases of petroleum hydrocarbon at the site will be abated in a timely manner. Implementation of any corrective action must comply with Title 23 of the California Code of Regulations.

Title 23 of the California Code of Regulations, Division 3 Chapter 16, Section 2652 requires that unauthorized releases from underground storage tanks be investigated and stopped. While certain steps have been taken to investigate tank tightness, it is necessary that you investigate other parts of the tank system in order to discover the source of the release. **Failure to investigate and correct the release will result in further enforcement action by this Office, including possible fines of up to $5,000 per day and/or a requirement to cease operation of the tanks.**

You may contact me with any questions about this letter at (510)567-6770.

Sincerely,

Pamela J Evans

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Alameda County Environmental Health Services
Gordon Coleman, ACEHS
Ariu Levi, ACEHS
Thomas Peacock, ACEHS
Susan Hugo, ACEHS
Kevin Graves, Regional Water Quality Control Board
Richard L. Jones, Piedmont Fire Department

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

RO#269

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

Certified Mail # P 074 535 620

September 19, 1997

Philip Briggs
Chevron Products Company
P.O. Box 5004
San Ramon CA 94583

Mir Ghafari & Fred Manoucheri
Piedmont Enterprises
340 Highland Av.
Piedmont CA 94611

Frank Hoffman
Hoffman Investment Company
1760 Willow Rd.
Hillsborough CA 94010

RE: Service Station at 340 Highland Av., Piedmont CA 94611 (Our Site #1143)

NOTICE OF LEGAL OBLIGATION

Gentlemen:

This agency has reviewed reports of tank and line tightness tests for the past past year. Although statistical inventory reconciliation data for some months in late 1996 were incomplete, these reports do not indicate a leak in the tank systems. Nonetheless, groundwater monitoring data have shown that concentrations of methyl tertiary butyl ether (MTBE) have increased in the monitoring well located down-gradient from the tanks. This letter serves to notify Chevron (the former tank owner/operator), Mr. Ghafari & Mr. Manoucheri (the current tank operators) and Mr. Hoffman (the current property owner) that further investigation is required to determine the source of the increasing MTBE in groundwater.

The tanks are not known to be outfitted with overfill prevention systems. A likely cause of this contamination is past and/or ongoing overfilling of the tanks or leaks at the dispensers. Please submit a work plan to investigate and correct releases of petroleum hydrocarbon contamination

at the site. At a minimum, your workplan should include steps you will take to investigate and correct contamination from overfilling, dispenser leaks or other causes. You must submit your workplan to this Office **no later than October 20, 1997**. It is necessary to coordinate this investigation among the responsible parties so that any ongoing releases of petroleum hydrocarbon at the site will be abated in a timely manner. Implementation of any corrective action must comply with Title 23 of the California Code of Regulations.

You may contact me with any questions about this letter at (510)567-6770.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Alameda County Environmental Health Services
Gordon Coleman, ACEHS
Ariu Levi, ACEHS
Thomas Peacock, ACEHS
Susan Hugo, ACEHS
Kevin Graves, Regional Water Quality Control Board
Richard L. Jones, Piedmont Fire Department

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

RO#269

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

Certified Mail # P 074 535 620

September 19, 1997

Philip Briggs
Chevron Products Company
P.O. Box 5004
San Ramon CA 94583

Mir Ghafari & Fred Manoucheri
Piedmont Enterprises
340 Highland Av.
Piedmont CA 94611

Certified Mailer# P 074 535 623

Frank Hoffman
Hoffman Investment Company
1760 Willow Rd.
Hillsborough CA 94010

Certified Mailer# P 074 535 622

RE: Service Station at 340 Highland Av., Piedmont CA 94611 (Our Site #1143)

NOTICE OF LEGAL OBLIGATION

Gentlemen:

This agency has reviewed reports of tank and line tightness tests for the past past year. Although statistical inventory reconciliation data for some months in late 1996 were incomplete, these reports do not indicate a leak in the tank systems. Nonetheless, groundwater monitoring data have shown that concentrations of methyl tertiary butyl ether (MTBE) have increased in the monitoring well located down-gradient from the tanks. This letter serves to notify Chevron (the former tank owner/operator), Mr. Ghafari & Mr. Manoucheri (the current tank operators) and Mr. Hoffman (the current property owner) that further investigation is required to determine the source of the increasing MTBE in groundwater.

The tanks are not known to be outfitted with overfill prevention systems. A likely cause of this contamination is past and/or ongoing overfilling of the tanks or leaks at the dispensers. Please submit a work plan to investigate and correct releases of petroleum hydrocarbon contamination

at the site. At a minimum, your workplan should include steps you will take to investigate and correct contamination from overfilling, dispenser leaks or other causes. You must submit your workplan to this Office **no later than October 20, 1997**. It is necessary to coordinate this investigation among the responsible parties so that any ongoing releases of petroleum hydrocarbon at the site will be abated in a timely manner. Implementation of any corrective action must comply with Title 23 of the California Code of Regulations.

You may contact me with any questions about this letter at (510)567-6770.

Sincerely,

Pamela J. Evans

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Alameda County Environmental Health Services
Gordon Coleman, ACEHS
Ariu Levi, ACEHS
Thomas Peacock, ACEHS
Susan Hugo, ACEHS
Kevin Graves, Regional Water Quality Control Board
Richard L. Jones, Piedmont Fire Department

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

R0269

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

January 16, 1997

Philip Briggs
Chevron Products Company
6001 Bollinger Canyon Rd., Bldg. L
San Ramon, CA 94583
P.O. Box 5004
San Ramon, CA 94583

Mir Ghafari & Fred Manoucheri
Chevron Service Station
340 Highland Avenue
Piedmont, CA 94611

Frank Hoffman
Hoffman Investment Company
1760 Willow Road
Hillsborough, CA 94010

RE: CHEVRON SERVICE STATION - 340 Highland Avenue, Piedmont, CA 94611
STID # 1143

Gentleman:

This agency has recently reviewed the Local Oversight Program (LOP) case file related to the underground storage tank releases at the above referenced site. High concentrations of methyl tertiary butyl ether (MTBE) has been detected in the groundwater beneath the property. The last quarterly groundwater monitoring report submitted by Philip Briggs of Chevron on October 24, 1996 showed MTBE concentrations as high as 110,000 ppb in well C-2. The MTBE concentration appears to be increasing in this well while the other two on site wells , C-3 and C-4 have non detect and 21 ppb, respectively. This letter serves to notify Chevron (the former tank owner / operator), Mr. Ghafari & Mr. Manoucheri (the current tank owners / operators), and Mr. Hoffman (the current property owner) that an investigation is required to determine the source of the increasing MTBE concentration detected in the groundwater.

A work plan must be submitted to identify any on-going releases of petroleum hydrocarbon contamination at the site. At a minimum, your work plan should include verification of the integrity of the tank system currently operating at the site. A tank and piping integrity testing must be conducted to determine if the increasing concentration of MTBE is coming from leakage or failures from the underground storage tanks and/or pipings.

Your work plan must be submitted to this office **no later than February 16, 1997.** It is necessary to coordinate this investigation among the responsible parties so that any on going releases of petroleum hydrocarbon at the site will be abated in a timely manner . Implementation of any corrective action must be consistent with the requirements stated in the California Underground Storage Tank Regulations (Title 23).

If you have any questions concerning this letter, please call Susan L. Hugo at (510) 567-6780 or Pamela Evans at (510) 567-6770.

Sincerely,

Susan L. Hugo
Senior Hazardous Materials Specialist

Pamela Evans
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Gordon Coleman, Acting Chief, Environmental Protection Division
Kevin Graves, San Francisco Bay RWQCB
Thomas Peacock, LOP Manager
SH / PE / files

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

STID: 1143

20269

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

August 14, 1996

Mir Ghafari and Fred Manoucheri
Piedmont Chevron
340 Highland Av.
Oakland CA 94611

RE: Permit to Operate Underground Storage Tanks at Piedmont Chevron (Site ID#1143)

Gentlemen:

Enclosed is the permit to operate four (4) underground storage tanks (USTs) at the referenced facility. The permit is valid until December 22, 1998. As of that date, upgrade requirements for single-walled tanks will be in effect. I have enclosed a summary of the upgrade requirements.

The tanks and monitoring system to be used are briefly described below:

Fuel tanks: Single-walled, fiberglass 10,000 gallon gasoline (regular, midgrade and premium) with single-walled suction piping of unknown material. The leak monitoring method used for these tanks is SIR and tightness testing every two years. Pipes are monitored by visual checks and performance indicators, and are precision tested every three years.

Waste oil tank: Single-walled, fiberglass 1,000 gallon tank with single-walled gravity piping. The leak monitoring method used for this tank is manual inventory reconciliation and tightness testing every two years. Pipes are precision tested every three years.

Continued compliance with applicable requirements of Chapter 6.7 and 6.75 of the Health and Safety Code and Title 23, California Code of Regulations is required in order for this permit to remain valid. **Permit conditions include**:

1) Report to this agency any unauthorized releases (spills or leaks) within 24 hours. Follow other requirements described in Title 23, California Code of Regulations, Division 3, Chapter 16, Article 5 (copy of Sections enclosed).
2) Maintain written records for SIR or other leak detection methods.
3) Keep records of repairs, lining and upgrades.
4) Implement any corrections specified by this office on an inspection report within 30 days of receiving the report.
5) Retain a copy of this permit, letter and attachments at your facility.

6) The tanks shall be product-tight.
7) Use care to prevent releases due to spilling of fuel or overfilling tanks. Before product is delivered, ensure that adequate space is available in the tanks for the product to be delivered. Monitor the filling operation so that spilling and overfilling is prevented.

If you make any changes in the monitoring methods, equipment types, and/or procedures used to monitor the tanks and piping at this facility, you must:

1) ensure the new procedures comply with Title 23, CCR; and
2) send written notification of the changes to this office.

You may contact me with any questions regarding the UST permit or this letter at (510) 567-6770.

Sincerely,

Pamela J Evans

Pamela J. Evans
Senior Hazardous Materials Specialist

Enclosures

c: Gordon Coleman, ACDEH
Don Atkinson-Adams, ACDEH

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

RO#269

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

June 24, 1996

Mr. Phil Briggs
Chevron U.S.A.
P.O. Box 5004
San Ramon, CA 94583

RE: Chevron Service Station 9- 0329 (STID #1143)
340 Highland Avenue, Piedmont, CA 94611

Dear Mr. Briggs:

The Alameda County Department of Environmental Health, Environmental Protection Division has reviewed the case file including the work plan for the installation of two additional monitoring wells prepared by Pacific Environmental Group (PEG) for the above referenced site.

Monitoring well MW-6 has been decommissioned due to artesian conditions encountered in the well. We are in receipt of the well abandonment report. However, monitoring well C-1 appeared to have been destroyed but records of the well abandonment has not been received by this office.

The two additional monitoring wells C-5 and C-6 proposed primarily to evaluate the soil and groundwater conditions crossgradient and downgradient of the site is acceptable to this agency. Per my discussion with your consultant, Pacific Environmental Group (PEG), the encroachment permit for well C-5 has not been approved by the City of Piedmont due to its location (near the Police Department and street parking).

This office has the following comments regarding the investigation of the petroleum hydrocarbon plume at the subject site:

1) The monitoring well C-5 can be relocated in the middle of Highland Avenue, between boring B-1 and monitoring well C-2. Monitoring wells C-5 and C-6 must be installed in a timely fashion to completely define the extent of the petroleum hydrocarbon plume at the site.

2) Methyl tertiary butyl ether (MTBE) at 64,000 ppb has been detected in well C-2 during the sampling event conducted on January 2, 1996. MTBE must be analyzed in soil and groundwater samples in addition to TPH gasoline and BTEX.

3) Monitoring wells at the site must be properly decommissioned. Please provide a copy of the abandonment for well C-1.

4) Please notify this office at least 72 hours in advance of any field activities at the site.

RO#269

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Please contact me at (510) 567-6780 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Susan L. Hugo
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Gordon Coleman, Acting Chief, Environmental Protection / files
Kevin Graves, San Francisco Bay RWQCB
Mark Sullivan, PEG, 2025 Gateway Place, Suite #440
San Jose, CA 95110

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

RAFAT A. SHAHID, Assistant Agency Director

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

R0269

March 31, 1993

Mr. Satar Ghafari
Mr. Fred Manoucheri
Piedmont Chevron
340 Highland Avenue
Piedmont, CA 94611

Re: FIVE-YEAR PERMITS FOR OPERATION OF FOUR UNDERGROUND STORAGE TANKS (UST's) AT 340 Highland Avenue, Piedmont, CA 94611

Dear Mr. Ghafari and Mr. Manoucheri:

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed should be used only as guidelines and may not meet your requirements under Title 23.

-- 1. Complete UST PERMIT FORM A - one per facility. (enclosed)
-- 2. Complete UST PERMIT FORM B - one per tank. (enclosed)
-- 3. Complete UST PERMIT FORM C - one per tank if information is available. (enclosed)
✓ 4. A written tank monitoring plan. (enclosed)
-- 5. Results of precision tank test(s) (initial and annual).
-- 6. Results of precision pipeline leak detector tests (initial and annual).
✓ 7. An accurate and complete plot plan. (enclosed)
✓ 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact at 510/271-4320 if you have any questions which may arise in completing the mandatory five year permit process.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

cc: Ed Howell/files

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

R0269

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

February 11, 1993
STID# 1143

Mr. Kenneth Kan
Chevron U.S.A. Inc.
P.O. Box 5004
San Ramon, California 94583-0804

RE: Status of the Soil and Groundwater Investigation/Remediation at Piedmont Chevron - 340 Highlands Ave., Piedmont, CA 94611

Dear Mr. Kan:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the soil and groundwater investigation/remediation at the referenced site. We are in receipt of the following reports submitted under Chevron's cover letter:

- Groundwater Sampling Report (12/5/89) prepared by Gettler-Ryan and submitted on 1/4/90
- Work Plan (4/17/90) prepared by Geo Strategies, Inc. (GSI) and submitted on 4/18/90
- Underground Tank Closure Permit approved by ACHD on 11/27/90
- Site Update (4/15/91) prepared by GSI and submitted on (4/22/91)
- Site Update (5/21/91) prepared by GSI and submitted on (5/23/91)
- Groundwater Monitoring Report (10/30/91) prepared by Groundwater Technology, Inc. (GTI) and submitted on 11/11/91
- Groundwater Monitoring Report (1/31/92) prepared by GTI and submitted on 2/18/92
- Groundwater Monitoring Report (5/1/92) prepared By GTI and submitted on 5/1/92
- Groundwater Monitoring Report (8/27/92) prepared by GTI and submitted on 9/2/92
- Groundwater Monitoring Report (12/2/92) prepared by GTI and submitted on 12/3/92
- Groundwater Monitoring Report (1/22/93) prepared by Sierra Environmental Services and submitted on 1/26/93
  Report Leak submitted January 1, 1991

Based upon the review process of all the reports submitted to this office for the referenced site, the following issues needed clarification and must be addressed:

* Please explain the changes or fluctuation of groundwater flow direction as noted below:

Date Measured	Flow Direction
11/15/89	Southwest
2/1/91	Southeast
4/16/91	Southwest
10/16/91	Northeast
1/8/92	Southeast
4/10/92	Southwest
7/14/92	Southwest
10/5/92	Northeast
1/6/93	South

* Please provide this office with a copy of the monitoring well installation report for C-1, C-2, C-3 and C-4 (installed on 11/89). The report must include the boring logs, monitoring well installation diagram, analytical results of all samples collected and all other data collected during the 1989 investigation.

* A work plan dated 4/17/90 was submitted to this office on 4/18/90 proposing to install 3 or 4 additional wells. Has this been implemented ? It appears that at this time, the extent of soil and groundwater contaminant plume has not been delineated. A proposal must be submitted to determine the extent of both the soil and groundwater contamination. All the elements in the proposal must adhere to RWQCB's guidelines "Appendix A".

* A closure permit to remove the four tanks on site was approved by this department on 11/27/90. Please explain the rationale behind the change of plans to continue the operation of the single walled tanks instead of removing them.

* Monitoring well C-1 detected 3,700 ppb of TPH gasoline and 98 ppb benzene during the 11/15/89 sampling event. At this time, it appears that C-1 had been abandoned. Please state the rationale behind the well abandonment, the date and the method used for well destruction.

* A Site Update Report (4/15/91) describe the encroachment permit for the wells off site and a June 1991 schedule for well installation. Has this been implemented?

* Monitoring well C-2 detected elevated levels of TOG: 12,000 ppb (8/7/89 sampling event) and 7,000 ppb (2/1/91 sampling event). C-2 is in close proximity to the waste oil tank.

Although TOG was non detect during the 10/16/91 and 4/16/91 sampling event, C-2 should be analyzed for TOG in addition to the other target compounds in the next sampling event for verification.

* Sheen was observed in monitoring well C-2 during the sampling events on 1/8/92, 4/10/92 and 7/14/92. Please explain how the separate phase hydrocarbon was addressed.

* Please submit a time schedule for all the investigation/ remediation activities at this site.

Response to the items mentioned above must be provided to this office **by March 15, 1993.**

Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or work plan:

- site map delineating contamination contours for soil and based on recent data should be included and the status of the investigation and cleanup must be identified

- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention

- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained

- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of reports and proposals must also be submitted to :

Rich Hiett
RWQCB, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the work plan must be confirmed in writing and approved by this agency or RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Gil Jensen, Alameda County District Attorney's Office
Edgar B. Howell, Chief, Hazardous Materials Division - files
Frank Hoffman - Hoffman Investment Company
1760 Willow Road, Hillsborough, CA 94010
Fred Manoucheri- Piedmont Chevron, 340 Highlands Avenue
Piedmont, CA 94611

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

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

(3)

May 9, 1989

Ms. Karen M. Singer
Aqua Terra Technologies
2950 Buskirk Ave., Suite 120
Walnut Creek, CA 94596

Subject: File Search For Piedmont, CA

Dear Ms. Singer:

As requested, we have searched our files for AB2185, Underground Tank and Prop. 65 reports. The following is a compilation of this search.

Name & Address	2185 Filed	UGT PERMIT	PROP. 65
Montclair Cleaners 6122 LaSalle Ave.	yes	-0-	none
R0495) Piedmont Shell 29 Wildwood Ave.	yes	4	none
Chevron R0269) 340 Highlands	no	4	none
S.D. Gross 90 Inverleith Terr.	no	1	none
Piedmont Corp. Yard 898 Redrock Rd.	no	1	none
→ Piedmont City Hall 120 Vista Ave.	no	2	none

This letter is limited to the information which is in our files and does not include any information which may be available to other agencies or businesses involved with these sites.

If you have any questions please call Edgar Howell, Program Administrator at (415) 271-4320.

Sincerely,

RAS

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EH:mnc

cc: Ed Howell
Files

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

R0269

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

May 9, 1989

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2950 Buskirk Ave., Suite 120
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Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Program

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