

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



B-26-03

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

RO0000291

March 25, 2003

Mr. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Ave  
San Lorenzo, CA 94580

RE: Workplan Approval for 16550 Ashland Ave, San Lorenzo, CA

Dear Mr. Kawahara:

I am the current casework for the above referenced site. I have completed review of the case file, including Blymyer's September 10, 2001 *Remedial Action Plan* that was prepared to address suspect magnetic anomalies and hydrocarbon-impacted soil identified in the vicinity of the northern-most lath house. The workplan to excavated the two suspect areas and the concrete pads is acceptable with the following addition/changes:

- In addition to proposed analysis for TPH as gasoline, BTEX, MTBE, total lead, and fuel additives, please include analysis for TPH as diesel.
- Soil samples collected from the former 5000-gallon diesel tank excavation at approximately 8.5 feet bgs contained up to 5,000 ppm TPHd. You should conducted limited overexcavation to reduce TPHd concentration to cleanup levels determined in the September 2002 risk evaluation.

Field work should commence within 45 days of the date of this letter, or by May 23, 2003. Please provide at least 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us)

eva chu  
Hazardous Materials Specialist

email: Mark Detterman, Blymyer

c: Donna Drogos

kawahara-1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



9-27-01

R0291

STID 4403

September 24, 2001

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA**

Dear Mr. Kawahara:

This office is in receipt of "Semiannual Groundwater Monitoring Report, Second Quarter 2001", dated August 8, 2001, regarding the above referenced site, submitted by Mr. Mark E. Detterman of Blymyer Engineering.

Per this report MW-3 well, which represents the most contaminated well, revealed 2,900ppb TPHgasoline, 680ppb TPHdiesel, 5.3ppb Benzene, and <2ppb MTBE. This indicates an overall decrease in concentrations of the constituents, with the exception of TPHgasoline and Toluene, compared to previous analysis.

The groundwater flow gradient was estimated to be northwesterly per previous calculations.

As indicated previously I understand that MTBE detection (by Method 8020) has been actually false positive since Method 8060 verified non-existence of MTBE. Furthermore the false concentrations of MTBE has always been detected at below 50ppb. Therefore, I concur with your conclusion that MTBE never existed at this site.

MW-4 well, located upgradient of the plume, has indicated some trace elements of petroleum hydrocarbon, indicative of possible off-site upgradient source. You may investigate to verify such potential by sampling and analysis of the upgradient area. However, please submit a plan prior to initiation of such investigation.

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
Alameda, CA 94501-1395  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



9-19-01

R0291

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(510) 567-6700  
FAX (510) 337-9335

**STID 4403**

September 18, 2001

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA**

Dear Mr. Kawahara:

This office is in receipt of "Remedial Action Plan" (RAP), dated September 10, 2001, regarding the above referenced site, submitted by Mr. Mark E. Detterman of Blymyer Engineering. The RAP document was prepared and submitted in response to a request by this agency's request to address the possible removal of the remaining pollutant and tanks as discussed previously.

I have reviewed the above document and discussed it with Mr. Mark E. Detterman of Blymyer Engineering. I would like to make the following comments regarding the above document:

- I understand that you will be sampling groundwater for contaminant analysis on a semi-annual basis and based on historic information of pollutant in groundwater.
- Tier 2 Risk Based Corrective Action plan will be performed in order to establish SSTLs, which will be used as clean up level goals.
- Based on the investigation so far, some free products might exist in soil and groundwater around the lath house, which is, located down-gradient of magnetic anomaly.
- Based on previous investigations, the groundwater flow gradient was northwesterly.

I concur with the proposal made by Mark E. Detterman of Blymyer Engineering regarding the above document concerning the above referenced site.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to be 'Amir K. Gholami', followed by a horizontal line extending to the right.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave., Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



05-1181

PO291

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1131 Harbor Bay Parkway, Suite 250  
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(510) 567-6700  
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Stid 4403

May 10, 2001

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA

Dear Mr. Kawahara:

I am in receipt of "Final Report, Quarterly Groundwater Monitoring Report, First Quarter 2001", dated 3/26/2001, regarding the above referenced site, submitted by Mr. Mark E. Determan of Blymyer Engineering. I would like to make the following comments regarding this document:

1. According to this report the MW-3 well, which represents the most contaminated well, revealed 2,400ppb TPHgasoline, 880ppb TPHdiesel, 28ppb Benzene, and <2ppb MTBE. This reveals an overall decrease in concentration trend compared to previous analysis.
2. The groundwater flow gradient was northwesterly according to Figure 3 and based on previous data.
3. In my letter dated April 23, 2001, I had requested that you to submit a workplan to address the possible removal of the remaining pollutant and tanks as discussed previously. This document was to be submitted by May 7, 2001. However, to this date this office has not received this document. Please submit the required workplan by June 10<sup>th</sup>, 2001. This issue must be resolved as a part of potential source removal process.
4. I will look forward to the amended risk assessment in order to establish remedial goals as indicated within this report. However, please be advised that item 3 indicated above should be considered as part of risk management and eventual closure of the above referenced site.
5. I understand that MTBE detection (by Method 8020) has been actually false positive since Method 8060 verified non-existence of MTBE. Furthermore the false concentrations of MTBE has always been detected at below 50ppb. Therefore, I concur with your conclusion that MTBE never existed at this site.

6. You may initiate a semi-annual groundwater sampling and monitoring rather than a quarterly basis as proposed.

Please call me at (510) 567-6876, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami'. The signature starts with a vertical line, followed by a sharp downward hook, then a long horizontal line that tapers slightly to the right.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



04-24-01

20291

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1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
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Stid 4403

April 23, 2001

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA**

Dear Mr. Kawahara:

I have received and reviewed the "Quarterly Groundwater Monitoring Report, Fourth Quarter 2000", dated December 13<sup>th</sup>, 2000, regarding the above referenced site, submitted by Mr. Mark E. Detterman of Blymyer Engineering. Please consider the following comments regarding this document:

1. According to this report the level of the constituents concentrations have generally decreased even though the concentrations detected this period is higher than those detected during August 2000. The MW-3 well, which represents the most contaminated well, detected up to 9,000ppb TPHgasoline, 3,700ppb TPHdiesel, 35ppb Benzene, and <10ppb MTBE.
2. Per Figure 3 and based on previous data, the groundwater flow gradient was northwesterly.
3. Please submit plan to address the possible removal of the remaining pollutant and tanks as discussed previously. This document was to be submitted by December 20<sup>th</sup>, 2000. To this date this office has not received this document. Please submit the required workplan by May 7, 2001.
4. The risk assessment will be reviewed as requested. However, please be advised that even if the risk assessment is totally conservative and approved, you must still remove all remaining potential tank(s) as part of source removal process before the case can be considered for eventual closure. Of course there are other criterion, which must be met as well. The removal of potential tank(s) might also address the former detection of pollutants in MW-4 per your discussion within this report.

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

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
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DAVID J. KEARS, Agency Director



1279-00

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

Stid 4403

December 18, 2000

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA

Dear Mr. Kawahara:

I have just received the "Health Risk Assessment Workplan" dated January 20, 2000 submitted by Mr. Mark Detterman of Blymyer Engineers, Inc. regarding the above referenced site. As you are aware site specific data will be used to perform a risk assessment in order to establish Site Specific Target Levels (SSTLs) for soil and groundwater. The newly derived SSTLs will be used as a guideline to remove the remaining petroleum hydrocarbon sources including the potential tank at this site.

I have reviewed this document and generally concur with this workplan. However, please consider the following comments:

1. Ensure that you will be using data from the vadose zone for your calculations.
2. Perform a well survey to rule out the possibility of risk regarding the groundwater ingestion pathway.

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



12-18-00

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**Stid 4403**

December 14, 2000

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA**

Dear Mr. Kawahara:

I am in receipt of a letter dated December 11, 2000, submitted by Mr. Mark Detterman of Blymyer Engineers, Inc. regarding the above referenced site.

I also called and discussed the clean up issues with Mr. Detterman regarding the above referenced site. Mr. Detterman has indicated that he submitted a workplan in January 2000, which addressed my concern regarding the potential remaining abandoned underground tank at your property. I further indicated that this potential tank must be removed and that my correspondence dated November 20<sup>th</sup>, 2000 required its removal and submittal of a plan by December 20<sup>th</sup>, 2000. Since I never received your workplan please disregard my request for submittal of a workplan in my letter dated November 20<sup>th</sup>, 2000.

However, I have asked Mr. Detterman to submit a copy of this workplan to this office so that we could proceed further with the clean up issues at the above referenced site.

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



SENT 3-22-2000  
mld cws

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Stid 4403

March 22, 2000

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA  
94580

Dear Mr. Kawahara:

I have received and reviewed the "Quarterly Groundwater Monitoring Report, Fourth Quarter, 1999", dated February 9, 2000, regarding the above referenced site, submitted by Mark E. Detterman of Blymyer Engineering. I have the following comments regarding this document:

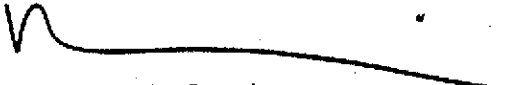
- Well MW-3 contains the highest concentrations of the constituents. However, the level of the constituents concentrations have decreased in MW-3 with the exception of TPHd and Ethylbenzene.
- According to this report, the groundwater flow gradient seems to be northwesterly.
- Since the concentration of MTBE increased you must perform one-time analysis by EPA method 8260.
- Monitoring of the TPHdiesel concentration must continue for two more rounds since its concentration has been fluctuating for the last few analysis.

Due to the possibility of existence of free product, the site could not be classified as "low risk groundwater" per result of the reports. However, you may perform a Tier 2 RBCA to establish Site Specific Target Levels (SSTL) and to submit plan for the removal of the remaining source of pollutant to proceed further toward closure.

Therefor you need to submit a plan to address the possible removal of the remaining pollutant and tanks as discussed in my previous letter. This document must be submitted no later than APRil 22nd, 2000.

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

Sincerely,

  
Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



FEB 15 2000

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1131 Harbor Bay Parkway  
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(510) 567-6700  
(510) 337-9432

Stid 4403

February 15, 2000

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA  
94580

Dear Mr. Kawahara:

This office is in receipt of the "Quarterly Groundwater Monitoring Report, Fourth Quarter, 1999", dated February 9, 2000, regarding the above referenced site, submitted by Mark E. Detterman of Blymyer Engineering. I have reviewed the above document and would like to make the following comments:

- MW-3 contains the highest concentrations of the constituents. However, the level of the constituents concentrations have decreased in MW-3 with the exception of TPHd and Ethylbenzene.
- Per this report, the groundwater flow seems to be northwesterly.
- An increase in concentration of MTBE requires one-time analysis by EPA method 8260.
- Continue monitoring of the TPHdiesel concentration for two more rounds since its concentration has been fluctuating for the last few analysis.

Since there is possibility of existence of free product, the site could not be classified as "low risk groundwater" per result of the reports. However, you may perform a Tier 2 RBCA to establish Site Specific Target Levels (SSTL) and to submit plan for the removal of the remaining source of pollutant to proceed further toward closure.

Therefor you need to submit a plan to address the possible removal of the remaining pollutant and tanks as discussed in my previous letter. This document must be submitted no later than March 15<sup>th</sup>, 2000.

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

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark E. Detterman, Blymyer Engineering, 1829 Clairmont Ave.,  
Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



*Sent 1/11/00  
Including cc's*

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

Stid 4403

January 11, 2000

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

I have received a phone call from Mr. Mark Detterman of Blymyer Engineering, your recent consultant, requesting an extension for submittal of a workplan, which had been due to further proceed with the required work at the above referenced site. The request for an extension is granted.

As discussed previously, this workplan is needed due to the following:

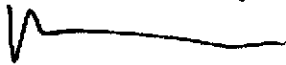
1. The potential presence of buried metal objects such as possible buried underground tank(s) near the west end of the lath house as indicated by geophysical survey equipment.
2. The samples of soil and grab groundwater taken from SB-4 and SB-5 indicated high concentrations of petroleum hydrocarbon, and these two samples are located downgradient of the magnetic anomaly per indication by geophysical survey equipment.
3. The water samples SB-4 and SB-5 indicated presence of petroleum sheen, and free product was observed on the soil samples.
4. The existence of significant concentrations of TPHg and Benzene within MW-3 groundwater samples, which is located between the barn and the northernmost lath house.

In addition to the above, this site can not presently be classified as " low risk groundwater/soil" site due to the fact that there are still possible source of further contamination, which must be addressed.

**Please submit a workplan to address the possible removal of the remaining tanks and other issues indicated above by February 4<sup>th</sup>, 2000.**

Should you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mark Detterman of Blymyer Engineers, 1829 Clement Ave.,  
Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



*Sent 12/27/99  
Includ. cc's*

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Stid 4403

December 22, 1999

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

I am in receipt of the "Results of Additional Subsurface Investigation and Quarterly Groundwater Monitoring, Second Quarter, 1999", dated September 2, 1999, regarding the above referenced site, submitted by Jeanna Hudson of Blymyer Engineering. I reviewed the above document and concur with Ms. Hudson's recommendation due to the following indications:

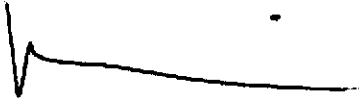
- Geophysical survey indicating presence of buried metal objects such as possible buried underground tank(s) near the west end of the lath house.
- Samples of soil and grab groundwater taken from SB-4 and SB-5 indicated high concentrations of petroleum hydrocarbon. These two samples are located downgradient of the magnetic anomaly per indication by geophysical survey equipment.
- SB-4 and SB-5 water samples revealed presence of petroleum sheen. Additionally free product was observed on the soil samples.
- Significant concentrations of TPHg and Benzene were detected from MW-3 groundwater samples, which is located between the barn and the northernmost lath house.

Additionally at the present situation this site can not be classified as " low risk groundwater/soil" site and the fact that there are still possible source of further contamination, which must be removed.

**Please submit a plan to address the possible removal of the remaining tanks and other issues indicated above within 30 days or by January 22<sup>nd</sup>, 2000.**

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami'. The signature starts with a vertical line, followed by a sharp peak, then a horizontal line that tapers off to the right.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineering, 1829 Clairmont Ave., Alameda, CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0291

Stid 4403

July 30, 1999

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

ENVIRONMENTAL HEALTH SERVICES

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

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

**LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS**

Dear Mr. Kawahara:

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.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES .

1131 Harbor Bay Parkway, Suite 250

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(510) 567-6700

(510) 337-9335 (FAX)

Stid 4403

July 8, 1999

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

This office is in receipt of the "proposed plan for investigation of the soil/groundwater" dated June 21, 1999, regarding the above referenced site, submitted by Jeanna Hudson of Blymyer Engineering. I have reviewed the above document and concur with the proposed plan. I understand that there will be additional soil/ground water sampling downgradient of the former underground storage tank (UST) as well as on the west and east side of the MW-3 well per previous correspondence and discussion by this office.

Please call me at (510) 567-6876, should you have any questions.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineering, 1829 Clairmont Ave., CA 94501-1395  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



R0291

Stid 4403

June 17, 1999

John Kawahara  
Kawahara Nursery  
698 Burnett Ave.  
Morgan Hill, CA 95037

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-8577  
(510) 567-6700  
(510) 337-9335 (FAX)

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

I have received and reviewed the "proposed plan for investigation of the soil/groundwater" dated June 14, 1999, regarding the above referenced site, submitted by Jeanna Hudson of Blymyer Engineering. I concur with the proposed plan in general. However, please ensure the following are addressed:

- Additional soil and grab groundwater sampling should be performed downgradient of the former underground storage tank (UST) per my discussion with Geanna Hudson. This is required in addition to the samples indicated in the above report.
- Per my previous letter, take several grab groundwater samples on the west and east side of the MW-3 well to ensure that the groundwater has not diverted due to geological formations and thus revealing a drastic reduction in the concentrations of the chemical constituents in MW-3 well. This has been addressed by the PSB-5, PSB-4, and PSB-3 samples.

**Please modify and resubmit the plan accordingly to reflect the above required items by June 30, 1999.**

Should you have any questions, or need additional time please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineering, 1825 Clairmont Ave., CA 94501  
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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



POZAN

Stid 4403

June 2, 1999

Mr. & Ms. Kawahara  
Kawahara Nursery  
16550 Ashland Ave.,  
San Lorenzo, CA 94580

ENVIRONMENTAL HEALTH SERVICES

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

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

I have received and reviewed the "Quarterly Groundwater Monitoring Report" dated April 13<sup>th</sup>, 1999, regarding the above referenced site, submitted by Geanna Hudson of Blymyer Engineering. I concur with additional soil sampling. However, please address the following:

- The soil sampling should be performed around the perimeter of the former underground storage tanks (USTs) rather than the proposed locations. You may choose to take the proposed samples in addition to the soil samples around the perimeter of the former tanks.
- Perform several grab groundwater samples on the west and east side of the MW-3 well to ensure that the groundwater has not diverted due to geological formations and thus revealing a drastic reduction in the concentrations of the chemical constituents in MW-3 well.
- As indicated in the report, more round of groundwater monitoring will be necessary to get a better picture of the status of the plume.

**Please modify and resubmit the plan accordingly to reflect the above required items by June 21, 1999.**

Please call me at (510) 567-6876, if you have any questions, or need additional time.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineering, 1825 Clairmont Ave., CA 94501  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Ro# 291

Stid 4403

March 31, 1999

Mr. & Ms. Kawahara  
Kawahara Nursery  
16550 Ashland Ave.,  
San Lorenzo, CA 94580

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

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

I would like to remind you of the letter which, I sent you on January 14, 1999 where I informed you and Ms. Jeanna Hudson of Blymyer Engineering, your consultant, regarding the situation at the above referenced site. As you are probably aware, I still have not received the report regarding the implementation of the "workplan for Additional Site Characterization and Site Risk Classification" dated June 3, 1997. This plan called for an investigation to be performed at the above site in regard to the removal of an underground storage tank (UST). This plan was to be implemented immediately following Amy Leech's comments on June 6, 1997 and per Brian Oliva's follow up letter dated May 18, 1998.

Today, I discussed the scenario with Ms. Jeanna Hudson of Blymer Engineering who informed me that she would be sending in a report shortly. **Please send in the report immediately or by April 15<sup>th</sup>, 1999.**

**This is a formal request for technical information and hence any delays should be requested in writing.**

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineering, 1825 Clairmont Ave., CA 94501  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro # 291

Stid 4403

January 14, 1999

Mr. & Ms. Kawahara  
Kawahara Nursery  
16550 Ashland Ave.,  
San Lorenzo, CA 94580

ENVIRONMENTAL HEALTH SERVICES

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

**RE: Kawahara Nursery, at 16550 Ashland Ave., San Lorenzo, CA 94580**

Dear Mr. Kawahara:

This office has assigned me to review the above referenced site. On June 6, 1997, Amy Leech of our office responded to a document submitted by Blymyer Engineering, your consultant, regarding the "workplan for Additional Site Characterization and Site Risk Classification" dated June 3, 1997. This plan called for an investigation to be performed at the above site in regard to the removal of an underground storage tank (UST). This plan was to be implemented immediately following Amy Leech's comments on June 6, 1997. On May 18, 1998 Brian Oliva of our office sent you a letter in which he also requested implementation of the previously approved plan.

To this date, this office has not received any indication that the pre-approved work plan has been implemented. **Please begin implementation of the work plan within 30 days from receipt of this letter.**

**Please be advised that Chapter 6.7 of the Health and Safety Code Section 25299(b)(7) indicates that the underground tank owner is liable for civil penalty of \$500.00 to \$5000.00 per day for each day of violation for failure to perform required monitoring, testing, or reporting required pursuant to Section 25288 or 25289.**

**Please be aware that this case may be referred to the Alameda County District Attorney's office if the work does not begin within the time frame indicated above.**

**This is a formal request for technical information and hence any delays should be requested in writing.**

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

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineering, 1825 Clairmont Ave., CA 94501  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0291

ENVIRONMENTAL HEALTH SERVICES

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

June 18, 1998

STID #4403

Ms. Jean Kawahara  
16550 Ashland Avenue,  
San Lorenzo, CA 93580

**Subject: Kawahara Nursury, 16550 Ashland Avenue, San Lorenzo, CA 94580**

Dear Ms. Kawahara:

This office has received a document from Blymyer Engineers, your consultant of record, requesting an extension for the commencement of work at the site. The request stems from the fact that there has been difficulties receiving funding for *pre-approved* activities at the site from the Underground Storage Tank Cleanup Fund.

The request for extension is granted until July 18, 1998. However, if the pre-approval process is denied, the additional site characterization must continue. Please provide the necessary documents to you consultant immediately so as to preclude any further difficulties with the USTCP.

If you have any questions, please contact this office. The number is (510) 567-6737.

Sincerely,

Brian P. Oliva, REHS, REA  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymyer Engineers Inc.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0291

ENVIRONMENTAL HEALTH SERVICES

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

STID#4403

May 18, 1998

Mr. & Ms. Kawahara  
Kawahara Nursury  
16550 Ashland Ave.,  
San Lorenzo, CA 94580

**Subject:** Kawahara Nursury, located at 16550 Ashland Ave., San Lorenzo, CA 94580

Dear Mr. & Ms. Kawahara:

On June 6, 1997, this office responded to a document submitted by Blymer Engineers, your consultant of record, regarding the "Workplan for Additional Site Characterization and Site Risk Classification", dated June 3, 1997. The plan called for an investigation to be undertaken at the site related to the removal of an underground storage tank (UST). The work was to commence immediately, following implementation of comments made by Amy Leech, the former caseworker.

To this date, the investigation has not commenced. It will, therefore be necessary for you to initiate implementation of the previously approved plan *immediately*. I have spoken with your consultants and advised them of the necessity to continue the investigation at the site. Please begin work at the site within the next thirty (30) days. Please be advised that there are civil penalties for non-compliance with this request.

If you have any questions, please call this office at (510) 567-6737.

Sincerely,

Brian P. Oliva, REHS, REA  
Hazardous Materials Specialist

C: Jeanna Hudson, Blymer Engineering, 1825 Clairmont Ave., Alameda, CA 94501  
Bob Chambers, Alameda County Deputy District Attorney  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 291

Std 4403/lop  
June 6, 1997

Mr. and Mrs. Kawahara  
Kawahara Nursery  
16550 Ashland Ave  
San Lorenzo CA 94580

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

Subject: Investigations at Kawahara Nursery located at 16550 Ashland Ave., San Lorenzo CA

Dear Mr. and Mrs. Kawahara:

This office has completed a review of Blymyer Engineers' *Workplan for Additional Site Characterization and Site Risk Classification*, dated June 3, 1997, concerning the subject. This workplan proposes to investigate soil and groundwater conditions in the vicinity of monitoring well MW-3 and in the location of a former gasoline underground storage tank via a geophysical survey and GeoProbe® investigation; complete groundwater monitoring and sampling for monitoring wells MW-3 through MW-5; complete an evaluation of risk; and destroy monitoring wells MW-1 and MW-2. This workplan is acceptable to this office with the following comments/additions:

1. Soil and groundwater samples should be collected downgradient of monitoring well MW-3 adjacent to the residential home. This data can be used when evaluating residential exposure scenarios for risk.
2. The minimum analyses for the background soil sample should include fraction of organic carbon (foc), soil bulk density, soil moisture content, and soil porosity.
3. Per my conversation with Laurie Buckman on June 6, 1997, in addition to soil samples, "grab" groundwater samples will also be collected from all GeoProbe® borings.
4. It would be acceptable to this office if monitoring wells MW-1 and MW-2 were decommissioned now or in the future after this site qualifies for site closure. In any event, this office concurs that groundwater samples will no longer need to be collected from MW-1 and MW-2.
5. Subsequent to the geophysical study and prior to the GeoProbe® study, please contact and/or submit to this office the proposed soil and groundwater sample location map for review and approval.

If you have any questions or comments, please contact me at (510)567-6755.

Sincerely,

Amy Leech  
Hazardous Materials Specialist

c: Attn: Laurie Buckman, Blymyer Engineers, Inc., 1829 Clement Ave., Alameda CA 94501-1395

Cheryl Gordon, SWRCB  
ALL- File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0#291

StId 4403/lop

April 8, 1997

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

Mr. and Mrs. Kawahara  
Kawahara Nursery  
16550 Ashland Ave  
San Lorenzo CA 94580

Subject: Investigations at Kawahara Nursery located at 16550 Ashland Ave., San Lorenzo CA

Dear Mr. and Mrs. Kawahara:

This office has recently completed a review of the case file for the subject site. Our letter to you dated December 26, 1995 (copy attached), requested the submittal of the final draft of a work plan to delineate the extent of soil and groundwater contamination in the vicinity of groundwater monitoring well MW-3. To date, we have not received the requested work plan. In addition, quarterly reports have not been submitted to this office since October 6, 1995.

**Please submit the requested work plan and overdue quarterly reports to this office no later than April 30, 1997.** In addition, the San Francisco Bay RWQCB's *Interim Guidance on Required Cleanup at Low-Risk Fuel Sites* (copy attached) and the ASTM E1739-95 document entitled *Standard Guide for Risk-Based Corrective Action (RBCA) Applied at Petroleum Release Sites* should be used to evaluate this site and to assist in developing future work plans and corrective action.

Please be aware that in order to be eligible for reimbursement through the State Cleanup Fund, you must be in compliance with County requirements. This is a formal request for a work plan pursuant to Section 2722 (c)(d) of Title 23 California Code of Regulations. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency of RWQCB.

If you have any questions or comments, please contact me at (510)567-6755.

Sincerely,

Amy Leech  
Hazardous Materials Specialist

**ATTACHMENTS**

c: Attn: Laurie Buckman, Blymyer Engineers, Inc., 1829 Clement Ave., Alameda CA 94501-1395  
w/attachments

ALL- File



StId 4403

December 26, 1995

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

Mr. and Mrs. Kawahara  
Kawahara Nursery  
16550 Ashland Ave  
San Lorenzo CA 94580

Subject: Investigations at Kawahara Nursery located at 16550 Ashland Ave.,  
San Lorenzo, CA

Dear Mr. and Mrs. Kawahara:

This office has recently reviewed Blymyer Engineers' (Blymyer) Quarterly Groundwater Monitoring Report for Third Quarter 1995, dated October 6, 1995, and Blymyer's proposal for Additional Subsurface Investigations, dated July 14, 1995. In addition per your request during our October 18th meeting, I reviewed the case file regarding the fate of stockpiled soil from the diesel tank removal that occurred at your site in December 1992.

Groundwater Quarterly Monitoring

This office concurs with Blymyer's recommendation to reduce the sampling frequency for monitoring wells MW-4 and MW-5 to a semi-annual event and to eliminate sample collection from monitoring wells MW-1 and MW-2. Monitoring wells MW-1 and MW-2 were installed in June 1993 and are located cross-gradient from the former diesel tank. Groundwater has been sampled and analyzed from MW-1 and MW-2 for five quarters. TPH as gasoline, TPH as diesel, and BTEX have not been detected in groundwater samples collected from MW-1 and MW-2 since the wells were installed.

It does not appear that TPH as diesel has significantly impacted groundwater at this site. To date, TPH as diesel has not been detected in any of the groundwater samples collected from monitoring wells MW-1 through MW-5. Continue to analyze groundwater for TPH as gasoline and BTEX and discontinue analyses for TPH as diesel.

Fate of Diesel Impacted Stockpiled Soil

Per your request, I reviewed the case file regarding the fate of stockpiled soil at your site. When the diesel tank was excavated in December 1992, excavated soil from the tank pit was separated into two piles, pile ST-1 and pile ST-2. You were given authorization to reuse soil from ST-2, since analytical results from this pile was non-detect for TPH as diesel. However, as of August 1993, soil sampled from ST-1 was at 25 ppm TPH as diesel which is above the allowable concentrations for reuse at the site. You had indicated that you were making arrangements to dispose of this soil off-site. (See attached letters dated May 18, 1994 and May 31, 1995.) Please submit manifests for disposal for this soil or more recent sampling data for soil from pile ST-1.

Kawahara  
Re: 16550 Ashland Ave  
December 26, 1995  
Page 2 of 2

Soil and Groundwater Investigations in the Vicinity of MW-3

Elevated levels of TPH as gasoline and BTEX continue to be detected in groundwater samples collected from monitoring MW-3. You indicated during our meeting on October 18, 1995, that a 1,000 gallon gasoline underground storage tank (UST) was located next to monitoring well MW-3 but was removed some time ago. If you are able to pinpoint the exact location of this former tank, then the proposed geophysical survey could possibly be eliminated from the proposed work plan for delineating the extent of soil and groundwater contamination in the vicinity of monitoring well MW-3.

This office concurs with Blymyer's proposal to use Geoprobe to collect soil and groundwater samples to assist in delineating the extent of soil and groundwater contamination in the northwest corner of the subject property. Information obtained from the Geoprobe study will also assist in determining if removal of contaminated soil is appropriate and/or proper location(s) for additional monitoring well(s).

**Please submit to this office a final draft of the required work plan for delineating the extent of soil and groundwater contamination in the vicinity monitoring well MW-3 (location of the former gasoline UST) no later than February 1, 1996.**

If you have questions or need additional information, please call me at (510)567-6755.

Sincerely,



Amy Leech  
Hazardous Materials Specialist

**ATTACHMENT**

c: *fl* Attn: Laurie Buckman w/attachments  
Blymyer Engineers, Inc.  
1829 Clement Ave  
Alameda CA 94501-1395

Gordon Coleman-File(ALL)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

RAFAT A. SHAHID, DIRECTOR

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

StId 4403

October 18, 1995

Ms. Jean Kawahara  
Kawahara Nursery, Inc.  
16550 Ashland Ave  
San Lorenzo CA 94505

Subject: Kawahara Nursery, Inc., 16550 Ashland Ave., San Lorenzo, CA

Dear Ms. Kawahara:

Please find attached the original copy of the Proposal for Additional Subsurface Investigation, dated July 14, 1995, by Blymyer Engineers, Inc.. I made a copy of this proposal for our files per your request. As we discussed during our meeting today, I will contact you next week after I have had the opportunity to review this proposal and the case file records regarding the fate of soil from the diesel tank excavation that occurred in December 1992.

In addition as we discussed, I will contact Laurie Buckman with Blymyer to discuss the July 14th proposal in light of the information you provided me regarding a 1,000 gallon unleaded gasoline underground storage tank which you indicated was located next to monitoring well MW-3 and was removed from the subject site sometime in the past.

It was nice meeting with you. Please call me at (510)567-6755 if you have questions or concerns.

Sincerely,

Amy Leech  
Hazardous Materials Specialist

**ATTACHMENT**

c: Acting Chief of Environmental Protection - File(ALL)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

RÁFAT A. SHAHID, DIRECTOR

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

May 31, 1995

Sam Kawahara  
Kawahara Nursery  
16550 Ashland Ave  
San Lorenzo CA 94580

StId 4403

Subject: Investigations at Kawahara Nursery located at 16550  
Ashland Ave., San Lorenzo, CA

Dear Mr. Kawahara:

This office has recently reviewed Blymyer Engineers' (Blymyer) Quarterly Groundwater Monitoring Report for First Quarter 1995, dated April 17, 1995.

Because contaminant levels continue to be identified at very elevated levels from monitoring well MW-3, you are required to submit a work plan that proposes to identify the source and delineate the extent of contamination in soil and groundwater in the vicinity of MW-3 within 60 days from the date of this letter.

As stated in our letters to you dated August 10, 1994 and February 3, 1995, all monitoring wells at your site must be surveyed to an established bench mark (i.e. mean sea level), with an accuracy of 0.01 foot. It is my understanding that you currently have stockpiled soil at your site, and that this soil was analyzed in June 1993. Analytical results identified 25 parts per million (ppm) Total Petroleum Hydrocarbon as Diesel (TPHd). Per our conversation on May 24, 1995, you indicated you intend to dispose of this soil at Vasco landfill. Enclosed are "Waste Acceptance Guidelines" for Vasco for your reference. Please include confirmation of the well survey and the manifests for disposal of the stockpiled soil in the required work plan.

Please continue quarterly monitoring and sampling the monitoring wells at your site. If you have questions or need additional information, please do not hesitate to call me at (510)567-6755.

Sincerely,

A handwritten signature in cursive script that reads "Amy Leech".

Amy Leech  
Hazardous Materials Specialist

ATTACHMENT



Kawahara  
16550 Ashland Ave.  
May 31, 1995  
Page 2 of 2

c: Laurie Buckman  
Blymer Engineers  
1829 Clement Ave  
Alameda CA 94501-1395

Acting Chief of Environmental Protection - File(ALL)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

StId 4403

February 3, 1995

Alameda County CC4530  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

Sam Kawahara  
Kawahara Nursery  
16550 Ashland Ave.  
San Lorenzo, CA 94580

Subject: Blymyer's Subsurface Investigation Report and required investigations for Kawahara Nursery, located at 16550 Ashland Ave., San Lorenzo, CA

Dear Mr. Kawahara:

This office has reviewed Blymyer Engineers' (Blymyer) Subsurface Investigation Letter Report, dated December 16, 1994.

Significant contamination was, again, identified in the water samples collected from monitoring well (MW-3), located at the southwest corner of the Lath House. Benzene, a known carcinogen, was as high as 3,600 parts per billion (ppb) in the ground water at this location. However, this recent subsurface study did not reveal the source of the contamination found at MW-3. Although, it does appear that the source originates within your property, since contaminants were found to be non-detectable in the current upgradient monitoring well (MW-4). Further investigation as to the source of contamination found at MW-3 is warranted.

In our letters dated January 27, 1993 and August 10, 1994, you were directed to commence routine quarterly monitoring of all on-site monitoring wells. The recent sampling events did not include MW-1 and MW-2. Please be aware that failure to collect this data undermines efforts to accurately delineate the direction and extent of contaminant migration. You are directed to immediately begin quarterly monitoring of all on-site monitoring wells. A report of each quarterly monitoring event is due to this office the first day of the second month of each subsequent quarter until this site qualifies for final RWQCB "sign-off".

It is not clear whether monitoring wells on site have been surveyed to an established bench mark. All monitoring wells are to be surveyed to an established bench mark (i.e. mean sea level), with an accuracy of 0.01 foot.

Kawahara  
16550 Ashland Ave.  
February 3, 1995  
Page 2 of 2

Reports at nearby sites indicate that regional ground water flow directions have varied greatly. It appears that one or two additional rounds of quarterly monitoring data should be collected to assist in determining the source of contamination and the contaminant plume boundaries at this site. After this data is collected, you will be directed to submit a work plan to further delineate the source and extent of contamination.

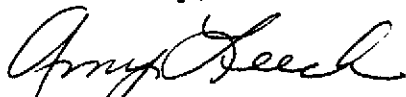
This office has recently received information to indicate that gasoline, as well as diesel, may have been stored in the former 5,000-gallon underground storage tank (UST) removed from the site in 1992, and that, two gasoline USTs may have been located on the property south of Ano Street, between MW5 and MW3. Unless other possible sources of contamination are brought to our attention, it appears future soil and ground water investigations should include these areas.

Lastly, please submit to this office within 30 days manifests for disposal for the former 5,000-gallon UST and the excavated soil associated with this tank.

We have enclosed a brochure which describes the Petroleum Underground Storage Tank Cleanup Fund for your review. This office encourages you to apply.

If you have any questions or comments please contact me at (510)567-6755.

Sincerely,



Amy Leech

encl.

cc: Laurie Buckman  
1829 Clement Ave.  
Alameda, CA 94501-1395

Ed Howell

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0291

RAFAT A. SHAHID, Assistant Agency Director

August 10, 1994

Mr. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Ave.  
San Lorenzo, CA 94580

Alameda County CC 4580  
Health Care Services Agency  
Dept. Of Environmental Health  
1131 Harbor Bay Pkwy-2nd Flr.  
Alameda, CA 94502-6577

STID 4403

Re: Work plan for investigations at Kawahara Nursery, located at  
16550 Ashland Ave., San Lorenzo, California

Dear Mr. Kawahara,

This office has reviewed Blymyer Engineers' (Blymyer) work plan, dated July 28, 1994, and amended work plan, dated August 4, 1994. The amended work plan is acceptable to this office. Please be reminded to wait a minimum of 24 hours after developing the proposed monitoring wells before collecting ground water samples. Additionally, please be reminded to include the documentation for the disposal of soil to Vasco Road in the next investigation report.

You are currently delinquent in the submittal of quarterly ground water monitoring reports. The last quarterly ground water monitoring event at the site was conducted in March 1994. It is the understanding of this office that all the site's monitoring wells will be sampled following installation of the three additional wells.

Please be reminded that the new wells shall also be surveyed to an established benchmark. Details of the survey shall be included in the investigation report.

Per the amended work plan, a report documenting the soil gas survey, well installations, and ground water sampling will be submitted within 90 days of the approval of the work plan, or by November 2, 1994.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin  
Hazardous Materials Specialist

Mr. Sam Kawahara  
Re: 16550 Ashland Ave.  
August 10, 1994  
Page 2 of 2

cc: Laurie Buckman  
Blymyer Engineers, Inc.  
1829 Clement Ave.  
Alameda, CA 94501-1395

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

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

May 18, 1994

Mr. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Ave.  
San Lorenzo, CA 94580

STID 4403

Re: Blymyer's Status Report for Kawahara Nursery, located at  
16550 Ashland Ave., San Lorenzo, California

Dear Mr. Kawahara,

This office has received and reviewed Blymyer's Subsurface Investigation Status Report, dated April 29, 1994. According to the investigation results and the well log for the irrigation well, it appears that this irrigation well is drawing from a deeper aquifer than the on-site monitoring wells and is not influencing the migration of the shallower ground water contaminant plume observed in Well MW-3. It appears that there is a clay layer, approximately 10 feet thick, which separates the shallower aquifer, which is screened by the on-site monitoring wells, from the deeper aquifer, which is screened by the irrigation well. Therefore, it appears that pumping of this irrigation well may continue at the site.

Per the latest ground water sampling results, collected on March 28, 1994, elevated levels of Total Petroleum Hydrocarbons as gas and diesel and benzene, toluene, ethylbenzene, and xylenes persist in Well MW-3. Additionally, elevated levels of soil contamination appear to be situated in the gravel lense observed in Well MW-3, at approximately 15 feet below ground surface, per the soil sample results collected in June 1993. Further delineation of the observed soil and ground water contamination is required. Blymyer has proposed to conduct a soil gas survey and install three additional monitoring wells at the site in order to locate the source of the observed contamination and delineate the extent of soil and ground water contamination. This proposal is acceptable to this office. A summary work plan outlining the details of this work is due to this office within **60 days** of the date of this letter.

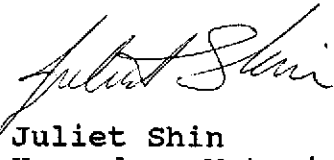
Please be reminded that as part of the required investigations, you will be required to address the delineation of the diesel soil contamination observed in the tank pit during the tank removal, at 5,000 ppm.

Mr. Sam Kawahara  
Re: 16550 Ashland  
May 18, 1994  
Page 2 of 2

Per my conversation with Laurie Buckman, Blymyer, on May 18, 1994, the stockpiled soil will be disposed of off site. Please be reminded to submit the documentation for the soil disposal after hauling off site.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Laurie A. Buckman  
Blymyer Engineers, Inc.  
1829 Clement Ave.  
Alameda, CA 94501-1395

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

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

March 14, 1994

Mr. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Ave.  
San Lorenzo, CA 94580

STID 4403

Re: Work plan for 16550 Ashland Avenue, San Lorenzo, California

Dear Mr. Kawahara,

This office has reviewed Blymyer's revised work plan, dated March 10, 1994. This work plan is acceptable to this office. The work plan must be implemented **within 30 days** of the date of this letter. A report documenting the work, and a second work plan including the proposal of additional monitoring wells, shall be submitted to this office **within 45 days** after completing field activities.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin  
Hazardous Materials Specialist

cc: Laurie A. Buckman  
Blymyer Engineers, Inc.  
1829 Clement Ave.  
Alameda, CA 94501-1395

Edgar Howell-File(JS)



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

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

January 20, 1994

Mr. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Avenue  
San Lorenzo, CA 94580

STID 4403

Re: Investigations at 16650 Ashland Avenue, San Lorenzo, CA

**SECOND NOTICE OF VIOLATION**

Dear Mr. Kawahara,

In a letter dated August 27, 1993, this office required that you submit a work plan by October 30, 1993 addressing the further delineation of the ground water contamination at the above site. Additionally, this office requested that you submit more information regarding use of the on-site irrigation well and how the pumping of this well may influence the site's ground water gradient flow. This office did not receive this work plan. On November 22, 1993, this office issued you the first Notice of Violation, requiring you to submit the work plan by January 4, 1994. To this date, this office has not received this work plan or any communication as to the status of this work plan.

One 5,000-gallon diesel underground storage tank was removed from the above site in December 1992. Soil samples collected from beneath this tank in native soil identified upto 5,000 parts per million (ppm) Total Petroleum Hydrocarbons as diesel (TPHD). Consequently, on June 10, 1993, Blymyer Engineers installed and sampled three monitoring wells (MW1 through MW3) at the above site. The ground water sample collected from Well MW-3 identified very elevated levels of TPH as gasoline at 120,000 parts per billion (ppb), TPHd at 170,000 ppb, and elevated levels of benzene, toluene, ethylbenzene, and xylenes (BTEX).

Per my conversation with you on November 22, 1993, you stated that Blymyer Engineers was currently working on the preparation of the work plan. I contacted Blymyer Engineers and they were not aware of having established any agreement with you to do any further work. Per my conversation with you on January 20, 1994, you again stated that Blymyer Engineers was currently working on the preparation of the work plan. Per my conversation with Laurie Buckman, Blymyer Engineers, on January 20, 1994, they were not aware of having been retained to prepare this work plan.

Mr. Sam Kawahara  
Re: 16550 Ashland Ave.  
January 20, 1994  
Page 2 of 2

You are required to submit the required work plan within 45 days of the date of this letter. This is a formal request for technical reports pursuant to Section 2722, Article 11, Title 23 California Code of Regulations. Any extensions or modifications of the required task must be approved by this office or the Regional Water Quality Control Board. If you fail to meet these requirements, this case will have to be referred to the Alameda County District Attorney's Office.

Additionally, per Section 2652, Article 5, Title 23 California Code of Regulations, quarterly ground water monitoring is required to continue at the site. You are required to resume quarterly ground water monitoring within 30 days of the date of this letter.

Lastly, this office encourages you to apply for the Petroleum Underground Storage Tank Cleanup Fund. You can contact the following to obtain the application package:

State Water Resources Control Board  
Division of Clean Water Programs  
UST Cleanup Fund Program  
2014 T Street, Ste 130  
Mail: P.O. Box 944212  
Sacramento, CA 94244-2120  
Telephone: (916) 227-4307

You can also contact Blessy Torres, State Water Program, at (916) 227-4535, with any questions you have regarding the application package.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office

Laurie Buckman  
Blymyer Engineers, Inc.  
1829 Clement Ave.  
Alameda, CA 94501

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 22, 1993

Mr. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Avenue  
San Lorenzo, CA 94580

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

STID 4403

Re: 16650 Ashland Avenue, San Lorenzo, California  
16550

**NOTICE OF VIOLATION**

Dear Mr. Kawahara,

One 5,000-gallon diesel underground storage tank was removed from the above site in December 1992. Soil samples collected from beneath this tank in native soil identified upto 5,000 parts per million (ppm) Total Petroleum Hydrocarbons as diesel (TPHd). Consequently, on June 10, 1993, Blymyer Engineers installed and sampled three monitoring wells (MW1 through MW3) at the above site. The ground water sample collected from Well MW-3 identified very elevated levels of TPH as gasoline at 120,000 parts per billion (ppb), TPHd at 170,000 ppb, and elevated levels of benzene, toluene, ethylbenzene, and xylenes (BTEX).

In a letter dated August 27, 1993, this office required that you submit a work plan addressing the further delineation of the ground water contamination at the above site. Additionally, this office requested that you submit more information regarding use of the on-site irrigation well and how the pumping of this well may influence the site's ground water gradient flow. This work plan was due by October 30, 1993. To this date, this office has not received a work plan or any communications as to the status of the work plan.

Per my conversation with you on November 22, 1993, you stated that Blymyer Engineers was currently working on the preparation of the work plan. I contacted Blymyer Engineers and they were not aware of having established any agreement with you to do any further work.

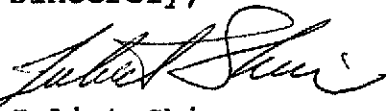
**You are required to submit the required work plan within 45 days of the date of this letter. This is a formal request for**

Mr. Sam Kawahara  
Re: 16550 Ashland Avenue  
November 22, 1993  
Page 2 of 2

technical reports pursuant to Section 2722, Article 11, Title 23 California Code of Regulations. Any extensions or modifications of the required task must be approved by this office or the Regional Water Quality Control Board. If you fail to meet these requirements, this case will have to be referred to the Alameda County District Attorney's office.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office

Laurie Buckman  
Blymyer Engineers, Inc.  
1829 Clement Avenue  
Alameda, CA 94501

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R.O 291

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

August 27, 1993

Ms. Sam Kawahara  
Kawahara Nursery  
16550 Ashland Avenue  
San Lorenzo, CA 94580

STID 4403

Re: Investigations at 16550 Ashland Avenue, San Lorenzo,  
California

Dear Mr. Kawahara,

This office has reviewed Blymyer Engineer's Preliminary Site Assessment report, dated July 28, 1993. The ground water sample collected from Well MW-3 identified very elevated levels of Total Petroleum Hydrocarbons (TPH) as gasoline at 120,000 parts per billion (ppb), TPH as diesel at 170,000 ppb, and benzene, toluene, ethylbenzene, and xylenes (BTEX). This office understands that, as far as you know, the former underground storage tank at the site was used solely for diesel storage. However, unless it can be proven that the above contamination is resulting from an off-site source, this office can only assume that the observed contamination could be resulting from your site.

Per Section 2725, Article 11, Title 23 California Code of Regulations, you are required to delineate the extent of this ground water contaminant plume by use of additional monitoring wells. The installation of additional wells could also be used to determine whether this contamination is resulting partially from an off-site source.

In order to determine whether there are any off-site contributing sources, you need to determine an accurate ground water gradient for the site. In order to determine an accurate ground water gradient, you must measure water levels from the monitoring wells when the irrigation well is not pumping. Additionally, you need to put this gradient information together with a pumping schedule for your irrigation well in order to accurately determine the varying range of site-specific ground water gradients. This office is requesting that you discontinue pumping of the irrigation well 24 hours before each quarterly monitoring and water level measurement event.

Mr. Sam Kawahara  
Re: 16550 Ashland Ave.  
August 27, 1993  
Page 2 of 2

This office is also concerned about the possibility that the on-site irrigation well is contaminated, since it is located so close to Well MW-3. Therefore, this office is requesting that you collect a ground water sample from this well. If the water being pumped from this well is found to be contaminated, you will be required to discontinue use/pumping of this well.

Additionally, if it is determined that there is an off-site contributing source of contamination, this office would strongly recommend that you discontinue pumping of your water well anyway since the pumping may expedite the migration of off-site contaminants onto your site.

Lastly, in the last phase of investigations at the site, one soil sample, SP-1A, was collected from Pile SP-1, and analysis of this soil sample identified 25 ppm TPH as diesel. This level of TPH as diesel in the soil is still too high for use as backfill material. Additionally, soil sample SP-1A was a composite sample, and the Bay Area Air Quality Management District requires one discreet sample per every 20 cubic yards of soil that will be reused on site. It is the understanding of this office that there is a "clean" pile of excavated soil, Pile SP-2, at the site, whose analysis did not identify any contaminants above detection limits. This pile of soil may be used to backfill the excavation.

You are required to submit a work plan for the above required work **within 60 days** of the date of this letter. If you have any questions about the required work or about financial assistance from the State Trust Fund, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Laurie Buckman  
Blymyer Engineers, Inc.  
1829 Clement Ave.  
Alameda, CA 94501-1395

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

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

May 20, 1993

Sam Kawahara  
Kawahara Nursery  
16550 Ashland Avenue  
San Lorenzo, CA 94580

STID 4403

Re: Work plan for Kawahara Nursery, located at 16550 Ashland Avenue, San Lorenzo, California

Dear Mr. Kawahara,

This office has received and reviewed Blymyer Engineer's work plan, dated May 12, 1993, for the installation and sampling of three monitoring wells at the above site. This plan is acceptable to this office. Field work shall commence within 60 days of the date of this letter. Additionally, a report documenting the field work shall be submitted within 45 days of completing field activities.

Lastly, it appears that the extent of soil contamination was never fully defined. Please be aware that you will eventually have to address the delineation of the soil contamination.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Laurie Buckman  
Blymyer Engineers, Inc.  
1829 Clement Ave.  
Alameda, CA 94501-1395

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0291

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

January 27, 1993

Mr. Sam Kawahara  
16550 Ashland Avenue  
San Lorenzo, CA 94580

STID 4403

Re: Required investigations at 16550 Ashland Avenue, San Lorenzo, California

Dear Mr. Kawahara,

On December 1, 1993, one 5,000-gallon diesel underground storage tank was removed from the above site. Two soil samples were collected from the tank pit, one from beneath each end of the tank, and two soil samples were collected from the excavated soil. The analysis of these samples identified Total Petroleum Hydrocarbons as diesel (TPHd) at 5,000 parts per million (ppm) in the sample collected from the east end of the tank, and at 210 ppm in the excavated soil.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) requires that a soil and ground water investigation be conducted when there is evidence to indicate that a release to soil and ground water may have occurred from the underground storage tank.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of latent soil and ground water contamination which may have resulted from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Board's LUFT Manual, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three wells



Mr. Sam Kawahara  
Re: 16550 Ashland Ave.  
Page 2 of 3  
January 27, 1993

will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, along with water level measurements. If the initial quarterly reports indicate that ground water flow directions vary greatly than you will be required to begin monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for the appropriate fuel contaminants listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

The PSA proposal is due within 60 days of the receipt of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of filed observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.

Mr. Sam Kawahara  
Re: 16550 Ashland Ave.  
Page 3 of 3  
January 27, 1993

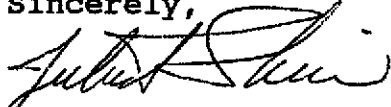
- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c) (d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Please be reminded to copy Richard Hiett, at the San Francisco Bay Region-Water Quality Control Board, on all correspondence and reports regarding this site.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0291

RAFAT A. SHAHID, Assistant Agency Director

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

October 7, 1992

Isami Kawahara  
Kawahara Nursery  
16550 Ashland Av.  
San Lorenzo CA 94580

**RE: Removal of 5000 Gallon Underground Storage Tank  
16550 Ashland Av., San Lorenzo**

Dear Mr. Kawahara:

In early August, 1992, I visited your property in response to a report of unauthorized tank removal activities. I informed you of the requirement for tank owners to properly close tanks and to submit closure plans to the County Department of Environmental Health and to the local fire department. I also supplied you with a closure plan form and written instructions on the Department's tank removal process.

Today Mrs. Kawahara told me that you are preparing to select a removal contractor and plan to have your 5000 gallon tank out by the end of this month. I am writing to notify you that the underground tank closure regulations (California Code of Regulations, Title 23, Section 2670 (f) require that closure plans be submitted to the local enforcement agency prior to tank removal. These plans must be submitted far enough in advance of the removal to allow for adequate review and, if necessary, correction. Your plans should be submitted to this office as soon as possible to allow for your target removal date. In any case, **the tank must be properly closed by December 3, 1992.**

You may contact me with any questions at 271-4320.

Sincerely,

Pamela J. Evans  
Senior Hazardous Materials Specialist

c: Mark Thomson, Alameda County District Attorney's Office  
James Ferdinand, Castro Valley-Eden Fire District